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11 Attorneys for Receiver  
12 Thomas A. Seaman

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**  
15 **WESTERN DIVISION**

16 SECURITIES AND EXCHANGE  
COMMISSION,

17 Plaintiff,

18 v.

19 STEVE CHEN, USFIA, INC.,  
20 ALLIANCE FINANCIAL  
GROUP, INC., AMAUCTION, INC.,  
21 ABORELL MGMT I, LLC, ABORELL  
22 ADVISORS I, LLC, ABORELL  
REIT II, LLC, AHOME REAL  
23 ESTATE, LLC, ALLIANCE  
NGN, INC., APOLLO REIT I, INC.,  
24 APOLLO REIT II, LLC, AMKEY, INC.,  
25 US CHINA CONSULTATION  
ASSOCIATION, and QUAIL RANCH  
26 GOLF COURSE, LLC,

27 Defendants.  
28

Case No. 2:15-cv-07425 RGK PLA

**NOTICE OF HEARING ON  
INTERIM FEE APPLICATIONS OF  
THE RECEIVER AND HIS  
PROFESSIONALS FOR PAYMENT  
OF FEES AND REIMBURSEMENT  
OF EXPENSES**

Date: April 11, 2022  
Time: 9:00 a.m.  
Ctrm.: 850  
Judge: Hon. R. Gary Klausner

**TO ALL INTERESTED PARTIES:**

**PLEASE TAKE NOTICE** that on April 11, 2022, at 9:00 a.m. in Courtroom 850 of the above-entitled Court, located at 255 East Temple Street, Los Angeles, California 90012-3332, the Court will consider the interim applications of Thomas A. Seaman ("Receiver"), the Court-appointed permanent receiver for Defendants USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc., Apollo REIT II, LLC, Amkey, Inc., US China Consultation Association, Quail Ranch Golf Course, LLC, and their subsidiaries and affiliates (collectively, "Receivership Entities") and his general counsel, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), for approval and payment of fees and expenses ("Applications").

The following table summarizes the fees incurred, interim payment requested, and costs requested by the Receiver and Allen Matkins for the period July 1, 2021, through December 31, 2021:

| <b>Applicant</b>  | <b>Fees Incurred</b> | <b>Interim Payment Requested</b> | <b>Costs</b>       | <b>Total Payment Requested</b> |
|---|----------------------|----------------------------------|--------------------|--------------------------------|
| Thomas A. Seaman, Receiver                                      | \$132,871.50         | \$119,584.35<br>(90%)            | \$0.00<br>(100%)   | \$119,584.35                   |
| Allen Matkins Leck Gamble Mallory & Natsis LLP, General Counsel | \$48,684.60          | \$38,947.68<br>(80%)             | \$316.25<br>(100%) | \$39,263.93                    |

**Procedural Requirements:** If you oppose the Applications, you are required to file your written opposition with the Office of the Clerk, United States District Court, 255 East Temple Street, Los Angeles, California 90012-3332 and serve the same on the undersigned not later than 21 calendar days prior to the hearing.

1 IF YOU FAIL TO FILE AND SERVE A WRITTEN OPPOSITION by the  
2 above date, the Court may grant the requested relief without further notice.

3  
4 Dated: March 11, 2021

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

5 By:           /s/ Edward G. Fates

6 EDWARD G. FATES  
7 Attorneys for Receiver  
8 Thomas A. Seaman  
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