

1 Maddin, Hauser, Wartell, Roth & Heller, PC
Michael S. Leib (P30470)
2 28400 Northwestern Hwy., 3rd Floor
Southfield, MI 48034
3 Telephone: (248) 827-1874/ Fax: (248) 359-6174
Email: msl@maddinhauser.com

4 Attorney for Flagstar Bank, FSB

5 Peter A. Davidson (SBN 76194)
6 Ervin Cohen & Jessup LLP
9401 Wilshire Boulevard, Ninth Floor
7 Beverly Hills, CA 90212-2974
Telephone: (310) 273-6333/ Fax: (310) 859-2325
8 Email: pdavidson@ecjlaw.com

9 Local Counsel for Flagstar Bank, FSB

10 **UNITED STATES DISTRICT COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION (LOS ANGELES)**

12
13
14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

17 CHARLES P. COPELAND, COPELAND
WEALTH MANAGEMENT, A FINANCIAL
ADVISORY CORPORATION, and
18 COPELAND WEALTH MANAGEMENT, A
REAL ESTATE CORPORATION,

19 Defendants.
20

CASE NO.: 2:11-cv-08607-R -DTB

**SUPPLEMENT TO OBJECTION OF
FLAGSTAR BANK, FSB TO THE
RECEIVER'S FIRST INTERIM
APPLICATION FOR APPROVAL AND
PAYMENT OF FEES AND COSTS**

Date: April 2, 2012
Time: 10:00 a.m.
Ctrm: 8
Judge: Hon. Manuel L. Real

21
22 Based on the representations made by the Receiver in his "Reply to Objections to
23 Receiver's Fee Application dated February 21, 2012" that none of the fees or costs the Receiver
24 seeks this Court's authority to pay will be paid from funds or assets of Copeland Properties Ten,

25 ///

26 ///

27 ///

28 ///

1 LP or from any of Flagstar Bank, FSB's cash collateral,¹ Flagstar Bank, FSB has no objection to
2 the payment of the fees and costs requested by the Receiver.

3
4
5 DATED: March 22, 2012

ERVIN COHEN & JESSUP LLP

6
7 By: /s/ Peter A. Davidson
8 PETER A. DAVIDSON,
9 Attorneys for Flagstar Bank, FSB
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

25
26 ¹ Flagstar Bank, FSB has a mortgage on Copeland Properties Ten, LP's real property in
27 Troy, Michigan and has a security interest in the rents generated from that property, as a result of a
28 duly recorded "Assignment of Leases and Rents" agreement. The rents generated from the
property, therefore, are the Bank's cash collateral securing the obligation to owed to it under the
mortgage and related note.

PROOF OF SERVICE**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 9401 Wilshire Boulevard, Ninth Floor, Beverly Hills, CA 90212-2974.

On March 22, 2012, I served true copies of the following document(s) described as **SUPPLEMENT TO OBJECTION OF FLAGSTAR BANK, FSB TO THE RECEIVER'S FIRST INTERIM APPLICATION FOR APPROVAL AND PAYMENT OF FEES AND COSTS** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

X BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Ervin Cohen & Jessup LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

X BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 22, 2012, at Beverly Hills, California.

/s/ Lore Pekrul

Lore Pekrul

ERVIN COHEN & JESSUP_{LLP}

SERVICE LIST

BY ELECTRONIC FILING

David M Rosen Rosend@sec.gov

Edward G Fates tfates@allenmatkins.com, bcrfilings@allenmatkins.com

Francis Emmet Quinlan, Jr Frank.Quinlan@ndlf.com, sue.love@ndlf.com

John M McCoy, III mccoyj@sec.gov

Michael S Leib mleib@maddinhauser.com, bwislinski@maddinhauser.com

Peter Alan Davidson pdavidson@ecjlaw.com

Spencer E Bendell bendells@sec.gov, LAROFiling@sec.gov, marcelom@sec.gov

William P Tooke wtooke@mechlaw.com

BY U.S. MAIL

Local Counsel for Flagstar Bank, FSB

Michael S. Leib, Esq.
Maddin, Hauser, Wartell, Roth & Heller, PC
28400 Northwestern Hwy., 3rd Floor
Southfield, MI 48034