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Proposed Counsel to the Debtor and Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

In re: CashCall, Inc., Debtor.	Case No. 26-03102-JBM11 Chapter 11 **DEBTOR'S *FIRST DAY* MOTION FOR AN ORDER EXTENDING TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS** [Declarations of Leslie Gladstone and J. Paul Reddam in Support of Chapter 11 Petition and First Day Pleadings Filed Concurrently] Date: Time: Place: Courtroom Name of Judge: Judge J. Barrett Marum

TO HONORABLE MARUM, UNITED STATES BANKRUPTCY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, ALL CREDITORS, PARTIES REQUESTING SPECIAL NOTICE:

1. By this Motion (this "**Motion**"), the above-captioned debtor (the "**Debtor**"), as debtor and debtor-in-possession herein, requests the entry of an order, substantially in the form attached hereto as Exhibit A (the "**Proposed Order**"), extending the deadline by which the Debtor must file its Schedules of Assets and Liabilities and Statement of Financial Affairs ("**Schedules and Statement**") required pursuant to section 521 of title 11 of the United States Code (the "**Bankruptcy Code**"), and Rule 1007 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"). In support of this Motion, the Debtor states as follows:

I. JURISDICTION AND VENUE

2. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory basis for the relief requested in the Motion are sections 105(a) and 521 of the Bankruptcy Code, Bankruptcy Rules 1007 and 9006, and the Southern District of California Local Bankruptcy Rule 1007-4.

II. BACKGROUND

4. On July 20, 2026 (the "**Petition Date**"), the Debtor filed its voluntary petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned case (the "**Chapter 11 Case**"). The Debtor continues to manage and operate its business as debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108. An official committee of unsecured creditors has yet to be appointed in this Chapter 11 Case. Further, no trustee or examiner has been requested or appointed.

5. A detailed description of the Debtor and its business, the facts and circumstances leading up to the filing of the Debtor's Chapter 11 Case, and the facts supporting this Motion are set forth in greater detail in the *Declaration of Leslie Gladstone in Support of the Debtor's Chapter 11 Petition and First Day Pleadings* (the "**Gladstone Declaration**") and *Declaration of J. Paul Reddam in Support of the*

Debtor's Chapter 11 Petition and First Day Pleadings (the "**Reddam Declaration**"), which are being filed concurrently herewith and are incorporated by reference in this Motion.

III. RELIEF REQUESTED

6. Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c) require a debtor to file schedules of assets and liabilities and a statement of financial affairs within fourteen (14) days from the date of filing its petition (the "**Initial Deadline**").

7. By this Motion, the Debtor seeks an extension of 30 days from the Initial Deadline to file the Schedules and Statements, through and including August 19, 2026, without prejudice to the Debtor's rights to request additional time.

IV. BASIS FOR RELIEF REQUESTED

8. Although the Debtor has commenced the process of gathering the necessary information to prepare and finalize its Schedules and Statements, the fourteen-day period provided by Bankruptcy Rule 1007(c), will be insufficient for the Debtor to complete its Schedules and Statements.

9. Pursuant to Bankruptcy Rules 1007(a)(5), 1007(c) and 9006(b), an extension of time to file the Schedules and Statements may be granted "for cause." While the Bankruptcy Rules do not define or delineate the parameters necessary to establish cause, courts have held that "cause" is a liberal standard, and extensions of time to file schedules and statements of financial affairs should be granted in the absence of prejudice or bad faith. *See Bryant v. Smith*, 165 B.R. 176, 181-82 (W.D. Va. 1994).

10. The nature of the Debtor's current business affairs, its limited availability to perform the required internal review of its financial and other records (the Debtor has no remaining employees), the matters that the Debtor must address in the early days of this Chapter 11 Case, and the pressure incident to the commencement of the Chapter 11 Case provide ample cause justifying the extension of the Debtor's deadline to file its Schedules and Statements.

11. The additional time requested by the Debtor to prepare and file its Schedules and Statements will help the Debtor smoothly transition into chapter 11, and ultimately maximize the value of its estate for the benefit of creditors and all parties-in-interest. Consequently, it is in the best interests of the Debtor and its creditors that the Debtor be granted the extension of time to file its Schedules and Statements. Therefore, the Debtor submits that cause exists to extend the deadline for the Debtor to file

its Schedules and Statements, without prejudice to the Debtor's right to seek a further extension of the deadline from this Court.

12. Courts in this jurisdiction and others routinely grant similar relief. *See*, *e.g.*, *In re Roman Catholic Bishop of San Diego*, Case No. 24-02202 (Bankr. S.D. Cal. June 27, 2024) (Dkt. 38); *In re GOL Linhas Aéreas Inteligentes S.A.*, Case No. 24-10118 (MG) (Bankr. S.D.N.Y. January 29, 2024) (Dkt. No. 67) (granting an additional 59 days to file schedules and statements); *In re Benitago, Inc.*, Case No. 23-11394 (SHL) (Bankr. S.D.N.Y. October 20, 2023) (Dkt. No. 100) (granting total of additional 44 days to file schedules and statements); *In re Avaya Inc.*, Case No. 17-10089 (SMB) (Bankr. S.D.N.Y. Feb. 10, 2017) (Dkt. No. 143) (granting an additional 47 days to file schedules and statements).

13. Pursuant to Local Rules 1007-4 and 9034-1(a)(1), prior to this filing, the Debtor requested a statement of position from the United States Trustee regarding this Motion by emailing the U.S. Trustee's Office this Motion, the supporting Gladstone and Reddam Declarations, and the Proposed Order attached hereto.

V. NOTICE

14. Notice of this Motion has been provided to: (i) the Office of the United States Trustee; (ii) the Debtor's secured creditors (there are none); (iii) any party whose interests are directly affected by this specific pleading; (iv) those persons who have formally appeared and requested notice and service in these proceedings pursuant to Bankruptcy Rules 2002 and 3017; (v) counsel for the proposed DIP Lender; (vi) the list of 20 largest unsecured creditors of the Debtor; and (vii) all governmental agencies having a regulatory or statutory interest in these cases. No other further notice need be provided.

VI. NO PREVIOUS REQUEST

15. No previous request for the relief sought herein has been made by the Debtor to this or any other court.

VII. CONCLUSION

WHEREFORE, the Debtor respectfully requests that the Court enter the proposed order, substantially in the form attached hereto, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: July 20, 2026

MANATT, PHELPS & PHILLIPS, LLP

By: */s/ Patrick L. DuBois*

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EXHIBIT A

CSD 1001A [07/01/18]

Name, Address, Telephone No. & I.D. No.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA
325 West F Street, San Diego, California 92101-6991

In Re CashCall, Inc. Debtor.	BANKRUPTCY NO. 26-03102-JBM11 Date of Hearing: Time of Hearing: Name of Judge: Judge J. Barrett Marum

ORDER ON

DEBTOR'S FIRST DAY MOTION FOR AN ORDER EXTENDING TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS

The court orders as set forth on the continuation pages attached and numbered 2 through 2 with exhibits, if any, for a total of 3 pages. Motion/Application Docket Entry No. _____.

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DATED:

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Judge, United States Bankruptcy Court

ORDER ON
DEBTOR: CASE NO: 26-03102-JBM11

The Court, having considered the First Day Motion for an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs (the "Motion for Extension of Deadline") filed by CashCall, Inc. (“Debtor”), the Chapter 11 debtor and debtor in possession in the above-captioned Chapter 11 bankruptcy case, and the Court having found that it has jurisdiction to consider the Motion for Extension of Deadline and the relief requested therein, and upon consideration of the Declarations in Support of First Day Motions submitted by the Debtor, and finding good cause to grant the Motion for Extension of Deadline,

HEREBY ORDERS:

1. The Motion for Extension of Deadline is GRANTED as set forth herein.

2. The Debtor is granted an extension of time through and including August 19, 2026 to file its Schedules and Statements, without prejudice to the Debtor’s right to seek a further extension of this time period by the filing of a motion on appropriate notice.

3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

END OF ORDER