CSD 1185 [03/24/26]

Name, Address, Telephone No. & I.D. No.
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Attorney for Judgment Creditor Eduardo De La Torre

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

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| In Re<br>CashCall, Inc.<br>Debtor(s) | BANKRUPTCY NO. 26-03102-JBM11 |
| Eduardo De La Torre<br>Moving Party | RS NO. ADL-1 |
| CashCall, Inc.<br>Respondent(s) | |

## NOTICE OF FILING OF A MOTION FOR RELIEF FROM AUTOMATIC STAY

TO THE ABOVE NAMED RESPONDENT(S)[1]:

**You are hereby notified** that a Motion for Relief from the Automatic Stay provided by §362 of the Bankruptcy Code has been filed. If you object to the Court granting relief from the automatic stay as requested in the Motion, **you must, within 11[2] days following the date of service of this notice of motion on you**:

1. Obtain a hearing date and time from the appropriate Courtroom Deputy for the judge assigned to this bankruptcy case. Determine which deputy to call by looking at the Bankruptcy Case No. in the above caption of this notice. If the case number contains the letters:

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| - | CL | - | call (619) 557-6019 | - | DEPARTMENT ONE (Room 218) |
| - | JBM | - | call (619) 557-5157 | - | DEPARTMENT TWO (Room 118) |

2. File with the Clerk of the Bankruptcy Court, at the address shown above, the original of:
   (a) an **"Opposition to Motion"**[2] (for real or personal property, use Form CSD 1161 of this Court);
   (b) a **"Declaration in Opposition to the Motion"**[2]; and
   (c) a separate **"Request and Notice of Hearing on Motion**," using Form CSD 1186 of this Court;
3. Serve a copy of these documents on the [Attorney for the] Moving Party named in the upper left hand corner.
4. Serve a copy of these documents on each of the additional parties as required by LBR 4001-3.

**If you fail to file with the clerk and serve on the moving party your request for hearing and the declaration in opposition to motion within the 11-day[2] period provided by this motion, the court may grant the moving party relief from the automatic stay without further notice to you or a hearing.**

Dated: September 28, 2026

[Attorney for] Moving Party

**All pleadings related to this particular RS action must contain the above caption.**

[1]LBR 4001-2, printed on the following page, governs service of this notice.
[2]Depending on how you were served, you may have additional time for response. See FRB service of this notice indicated in the Certificate of Service are printed on the following page

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1. **All pleadings related to this particular RS action must contain the above caption.**
2. **Instruction to Respondent**: If you file a "Declaration in Opposition to the Motion," it must be signed by the respondent under oath; and
   (1) identify the interest of the respondent in the property;
   (2) state with particularity the grounds for the opposition;
   (3) if respondent is the debtor or the trustee, state the provable value of the property specified in the Motion and the amount of equity which would be realized by the debtor after deduction of all encumbrances; and
   (4) contain a statement as to competence of the declarant and the foundation for any opinion.
3. **Instructions to Moving Party**: LBR 4001-2 provides that:
   "(a) A motion for stay relief ... must:
      "(1) name the debtor, co-debtors, and the trustee, as respondents;
      "(2) state with particularity the relief or order sought and the grounds for such relief or order;
      "(3) state the status of any pending foreclosure, repossession, or unlawful detainer proceeding;
      "(4) if the motion is filed in a chapter 11 or 13 case and if nonpayment of any post-Petition payment is a ground for relief, provide an accounting of each post-Petition payment received, the amount and date received, and date posted to the account;
      "(5) where the value of an asset is relevant, provide admissible evidence of value and any known encumbrances; and
      "(6) if the motion is brought for cause, provide admissible evidence of the specific facts that constitute such cause."
   "(b) Service. The Movant must serve the motion, together with Local Form CSD 1185, on the debtor, co-debtor, any counsel for the debtor, the trustee, and other Entities or Individuals entitled to receive notice of default or notice of sale under applicable non-bankruptcy law governing foreclosure of real or personal property which is the subject of the motion."

**** Motions filed <u>after</u> the case is closed are not entitled to a refund of fees.**

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**[The Certification of Service must accompany the Notice of Motion and any motion for entry of a default order pursuant to LBR 4001-5(a).]**

## CERTIFICATE OF SERVICE

I, the undersigned whose address appears below, certify:

That I am, and at all relevant times was, more than 18 years of age;

That on 28 day September of , 2026 [**Date of Service**[3]], I served a true copy of this NOTICE OF FILING OF A MOTION FOR RELIEF FROM AUTOMATIC STAY, together with a copy of the Motion for Relief from Stay and [describe any other papers] on the following persons listed below by the mode of service shown below:
List additional papers:
JUDGMENT CREDITOR EDUARDO DE LA TORRE'S MOTION FOR RELIEF FROM STAY AS TO ORANGE COUNTY UVTA CASE; and DECLARATION OF ARTHUR D. LEVY IN SUPPORT OF JUDGMENT CREDITOR EDUARDO DE LA TORRE'S MOTION FOR RELIEF FROM STAY

1. **To Be Served by the Court via Notice of Electronic Filing ("NEF")**:

Under controlling Local Bankruptcy Rules(s) ("LBR"), the document(s) listed above will be served by the court via NEF and hyperlink to the document. On September 28, 2026 , I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the e-mail address(es) indicated and/or as checked below:

☒ Attorney for Debtor (or Debtor), if required:
Schuyler G. Carroll scarroll@manatt.com
Patrick L. Dubois pdubois@manatt.com

☐ Chapter 7 Trustee:

☐ For Chpt. 11 & 12 cases:
UNITED STATES TRUSTEE
ustp.region15@usdoj.gov

☐ For Chapter 13 cases assigned to:
MICHAEL KOCH, TRUSTEE
mkoch@ch13.sdcoxmail.com

[3]This Date of Service commences the time period for responding to Motion.

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2. **Served by United States Mail**:

On _____, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing accurate copies in a sealed envelope in the United States Mail via 1) first class, postage prepaid or 2) certified mail with receipt number, addressed as follows:

☐ Attorney for Debtor (or Debtor), if required:

3. **Served by Personal Delivery, Facsimile Transmission, Overnight Delivery, or Electronic Mail**:

Under FRCP 5 and controlling LBR, on September 28, 2026, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission, by overnight delivery and/or electronic mail as follows:

☐ Attorney for Debtor (or Debtor), if required:
Attached list

I declare under penalty of perjury under the laws of the United States of America that the statements made in this proof of service are true and correct.

Executed on September 28, 2026
(Date)

Siyi He Siyi He
(Typed Name and Signature)

610 16th Street, Suite 420
(Address)

Oakland, CA 94612
(City, State, ZIP Code)

| Description | CreditorName | Email |
|---|---|---|
| Top 20 Creditor | Batavia Glen Phase 1, LP | sdassociates@sbcglobal.net |
| Consumer Financial Protection Bureau | Consumer Financial Protection Bureau | Christina.Coll@cfpb.gov; Joseph.Lake@cfpb.gov; emily.sachs@cfpb.gov |
| Top 20 Creditor | Experian | eSupport@experian.com |
| Counsel for J. Paul Reddam and Absolute Zero Corporation | Marshack Hays Wood LLP | Dwood@marshackhays.com; adeleest@marshackhays.com; Mgrimshaw@marshackhays.com |
| Top 20 Creditor | RELX Inc. DBA LexisNexis | customer.support@lexisnexis.com |
| Top 20 Creditor | Skadden LLP | christopher.heaney@skadden.com; caroline.vanness@skadden.com |
| Top 20 Creditor | Trans Union LLC | clientsvcs@tusales.com |
| Office of The United States Trustee | US Trustee for S District of CA | Haeji.Hong@usdoj.gov; Elvina.Rofael@usdoj.gov; Michelle.M.Kainen@usdoj.gov |
| Proposed Conflicts Counsel for the Debtor | Edward G. Fates | tfates@allenmatkins.com |
| Proposed Conflicts Counsel for the Debtor | Andrew E. Minna | amina@allenmatkins.com |