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UNITED STATES BANKRUPTCY COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

In re: CASHCALL, INC., Debtor.	Case No. 26-03102-JBM11 Chapter 11 **SUPPLEMENTAL DECLARATION OF SCHUYLER G. CARROLL IN SUPPORT OF APPLICATION TO EMPLOY MANATT, PHELPS & PHILLIPS, LLP AS COUNSEL TO THE DEBTOR** Date: November 4, 2026 Time: 10:00 A.M. Courtroom: 118 Dept: 2 Judge: J. Barrett Marum

I, Schuyler G. Carroll, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am an attorney admitted to practice in the State of New York and the District Courts for the Northern, Southern, Western and Eastern Districts of New York, the Southern District of Texas and the United States Courts of Appeals for the Second and Tenth Circuits. I am a partner of Manatt, Phelps & Phillips, LLP ("Manatt"), proposed counsel to debtor and debtor-in-possession CashCall, Inc. (the "Debtor"). I submit this declaration in connection with the Supplemental Brief in Support of Application to Employ Manatt, Phelps & Phillips, LLP as Counsel to the Debtor. I have personal knowledge of the matters stated below and could testify competently to them.

2. Manatt does not presently represent, and has not since the Petition Date represented, John Paul Reddam or any other entity which he controls and/or has an ownership interest in, in any matter. The following is a description of the persons and entities that are affiliated with Reddam that Manatt previously represented. Each of these representations (other than the Debtor) concluded prior to the Petition Date:

a. John Paul Reddam, including in the class action entitled *De La Torre v. CashCall, Inc.*, San Mateo Superior Court Case No. 19CIV01235 and the fraudulent transfer action entitled *De La Torre v. John Paul Reddam,* Orange County Superior Court Case No. 30-2024-01421309-CU-NP-NJC. Manatt began representing Reddam on other matters in 2013. Thereafter, while Manatt did not represent Reddam the entire time, Manatt periodically represented Reddam on various different matters, until the representation terminated on July 2, 2026.

b. Absolutely Zero Corporation f/k/a: Owning Corporation. Manatt's representation began in approximately June 2019 and terminated on July 2, 2026.

c. Settle It, Inc. Manatt's initial representation began in approximately October, 2018 and terminated in approximately November, 2018. Manatt later represented Settle It, Inc. again beginning in approximately May, 2019 and terminated in approximately December, 2022.

d. LoanMe, Inc. f/k/a Cash4Rent, Inc. Manatt's representation began in approximately September 2013 and terminated in approximately July 2022.

e. Ditech Financial LLC. Manatt's representation began in approximately January 2020 and terminated in approximately August, 2020.

f. Guaranteed Rate, Inc. Manatt's representation began in approximately July 2021 and terminated in approximately November 2021.

g. Delbert Services Corporation. Manatt's representation began in approximately February 2014 and terminated in approximately July 2014.

h. Delbert Meeks. Manatt's representation began in approximately October 2024 and terminated in approximately April 2026.

i. Servicing Solutions. Manatt's representation began in and was terminated in 2021. Reddam, however, did not acquire an ownership interest in Servicing Solutions until after Manatt's representation terminated.

3. Beginning in September 2014, Manatt provided the services of Mick Grasmick, a Manatt Partner, to work full time for Reddam and continued to do so through July 2015. Mr. Grasmick is no longer a partner of Manatt and has not been associated with Manatt in any capacity since 2016.

4. MPP will not represent the Debtor in connection with any matter that is adverse or potentially adverse to Reddam. The Debtor has proposed the retention of Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins") to serve as special conflicts counsel and represent the Debtor in connection with causes of action against Mr. Reddam and his affiliated entities, as more fully set forth in Allen Matkins' Application for Employment.

5. Other than issues related to the Fraudulent Transfer Action, there are no issues in the above-captioned case that are related to any of the matters on which Manatt provided legal advice and services for the clients listed in paragraph 2 hereof.

6. The issues for which Manatt has been retained in the above-captioned case are not closely related to the issues for which Manatt provided legal advice and services for the clients listed in paragraph 2 hereof.

Executed on October 7th, 2026, at New York, New York.

/s/Schuyler G. Carroll
Schuyler G. Carroll