MANATT, PHELPS & PHILLIPS, LLP
Schuyler Carroll (Bar No. NY 2511707)
SCarroll@manatt.com
7 Times Square
New York, NY 10036
Tel: (212) 790-4500
Email: scarroll@manatt.com

MANATT, PHELPS & PHILLIPS, LLP
Patrick L. DuBois (SBN 350331)
12730 High Bluff Drive, Suite 300
San Diego, CA 92130
Tel: (619) 205-8512
Email: pdubois@manatt.com

Proposed Attorneys for 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 CaseNumber Chapter 11 **SUPPLEMENTAL DECLARATION OF PETER HURWITZ REGARDING THE DEBTOR'S ASSETS** Date: November 4, 2026 Time: 10:00 A.M. Courtroom: 118 Dept: 2 Judge: Hon. J. Barrett Marum

I, Peter Hurwitz, declare as follows:

1. I am a Principal of Dundon Advisers LLC ("Dundon"), the financial advisor to CashCall, Inc. (the "Debtor"). Dundon's retention was approved by order of this Court entered on September 18, 2026 [Docket No. 148]. Matthew Dundon, previously submitted a declaration in support of the Debtor's First Day DIP Financing Motion on July 20, 2026 [Docket No. 6] (the "Initial Declaration"). I submit this supplemental declaration (the "Supplemental Declaration") to describe the assets of the Debtor's estate that may be available for monetization.

2. Except as otherwise stated, the facts set forth in this Supplemental Declaration are based on my personal knowledge, my review of the Debtor's books and records, information provided by the Debtor's management and professionals, and work performed by Dundon personnel under my supervision. If called as a witness, I could and would testify competently to these facts. Capitalized terms used but not defined herein have the meanings given in the Initial Declaration.

3. This Supplemental Declaration is intended to be descriptive. It identifies the categories of assets the Debtor owns and describes each based on a review of the Debtor's records. This Supplemental Declaration does not discuss avoidance actions that the Debtor may commence or the potential to sell such actions. This Supplemental Declaration expresses no opinion as to the value of any asset or the proceeds any asset would realize in a sale, and nothing herein should be construed as a valuation or a representation regarding the outcome of any marketing process. The Debtor has not yet determined how any of these assets will be monetized and reserves all rights with respect thereto.

4. To my knowledge, and based on the Debtor's books and records and the schedules filed in this case, none of the assets described below is subject to any lien, security interest, pledge, or other encumbrance, and each is property of the Debtor's estate under section 541 of the Bankruptcy Code.

A. The Loan Portfolio

5. One of the Debtor's assets is a portfolio of consumer loans that the Debtor originated and holds in its own name (the "Loan Portfolio"). Based on the Debtor's servicing records as of September 2, 2026, the Loan Portfolio consists of 188 loans with an aggregate unpaid principal balance of approximately $1,209,000, together with accrued and unpaid interest of approximately $14,000 and outstanding fees of approximately $3,500. The loans were originated with an aggregate original principal amount of approximately $1,660,000. No loan in the Loan Portfolio has been sold, participated, or assigned to any third party.

6. Of the 188 loans, 183 loans, representing approximately $1,164,000 of unpaid principal, were made to California borrowers; the remaining five loans were made to borrowers in four other states. The median loan balance is approximately $5,600. The ten largest loans, with balances ranging from approximately $23,000 to $83,000, account for approximately $443,000, or roughly 37% of the aggregate unpaid principal balance.

7. The Loan Portfolio reflects two distinct origination periods. Approximately 158 loans, representing approximately $764,000 of unpaid principal, were originated in 2025 and 2026 under the Debtor's consumer installment product, which consists principally of 60-month loans in original amounts of $3,100 or $7,000 bearing interest at approximately 30% per annum. The balance of the Loan Portfolio consists of older loans, the majority of which were originated in 2019, including larger-balance "cash out" loans bearing interest at approximately 18% per annum and a small number of long-dated loans with maturities extending to 2044 and beyond. Sixteen loans with modest remaining balances have been modified under settlement arrangements and in most cases bear a reduced or zero interest rate; in total, 21 loans representing approximately $77,000 of unpaid principal currently bear no interest.

8. As of September 2, 2026, 84 loans, representing approximately $489,000 of unpaid principal, were contractually current, and 66 loans, representing approximately $537,000 of unpaid

principal, were between one and thirty days past due, such that approximately 85% of the Loan Portfolio by balance was within thirty days of contractual terms. The remaining 38 loans, representing approximately $183,000 of unpaid principal, were between 31 and 120 or more days delinquent. Delinquency is concentrated in the 2025 originations, of which 34 loans representing approximately $145,000 of unpaid principal were more than thirty days past due. Scheduled monthly payments across the Loan Portfolio total approximately $40,400, and the Debtor received payments on the substantial majority of the loans during August 2026. No loan in the Loan Portfolio is coded as charged off or paid in full in the Debtor's servicing records.

9. Any loan-level schedule of the Loan Portfolio made available in connection with this case will be redacted in accordance with Rule 9037 of the Federal Rules of Bankruptcy Procedure, as the Debtor's servicing records contain borrower names, residential addresses, and bank account information.

B. California Finance Lender License

10. The Debtor holds a finance lender and broker license issued by the California Department of Financial Protection and Innovation (the "DFPI") under the California Financing Law, Cal. Fin. Code § 22000 et seq., License No. 603-8780 (the "CFL License"). The CFL License is issued to CashCall, Inc. and reflects the Debtor's authority to conduct business under the fictitious business names CashCall Entrepreneur Loans, CashCall MBL, CashCall Micro Business Loans, Chapter Seven Lending, and Redo Home Loans.

11. The CFL License authorizes the Debtor to make and broker consumer and commercial loans in California, and the loans in the Loan Portfolio made to California borrowers were originated under its authority.

12. The Debtor has not yet begun a process to determine the potential value of the CFL License or how to best market and monetize the value of the CFL License.

13. By its terms, the CFL License is not transferable or assignable, and any change in control of a licensee is subject to the prior approval of the Commissioner of Financial Protection and Innovation. The CFL License therefore cannot be sold as a standalone asset apart from the Debtor. It bears on the monetization of the Debtor's other assets in two respects. First, a purchaser of the Loan Portfolio that does not itself hold a California finance lender license would require one, or would need to service the California loans through a licensed entity, to collect on those loans at their contract rates. Second, a transaction structured as an acquisition of the Debtor's equity or of a reorganized Debtor, rather than of its assets, would preserve the CFL License, subject to DFPI approval of the resulting change in control.

C. Website, Domain Name, and Telephone Number

14. The Debtor owns and operates the internet domain name cashcall.com and the associated website, through which it has historically marketed its loan products and received and processed loan applications. The Debtor also holds a toll-free telephone number, which has served as the Debtor's principal customer-facing telephone number. The Debtor has operated under the CashCall name since 2003, and the domain name, website and telephone number are the principal means by which existing and prospective customers identify and contact the Debtor. The Debtor has not yet begun a process to determine the potential value or how to best market and monetize the value of these assets.

D. Customer Lists

15. The Debtor maintains records of the customers with whom it has done business over the course of its operations (the "Customer Lists"). The Customer Lists comprise the universe of persons who have obtained loans from the Debtor and include, as to each such person, identifying and contact information, loan history, and payment history. The Customer Lists are extensive and may have saleable value. The Customer Lists contain non-public personal information of consumers, and any transfer of the Customer Lists would be subject to applicable federal and state privacy law. Accordingly, any sale of the Customer Lists to a purchaser that is not an affiliate of the Debtor may require the appointment of a

consumer privacy ombudsman under section 332 of the Bankruptcy Code pursuant to section 363(b)(1)(B).

E. Data, AI

16. The Debtor owns certain data and analytics that may have value to potential purchasers. This includes internal enterprise, workflow, productivity, systems management and operations data. By way of background, Spirit Airlines recently engaged in a sale process for similar data, which resulted in a multi-million dollar purchase price.[1] Dundon is unable to predict the potential value of the data and does not expect the Spirit sale to be indicative of the value of the Debtor's data. Because of the substantial operations of the Debtor and the numerous loans and interactions with consumers over more than two decades, this data is likely to have value. Indeed, Manatt and Dundon have received inquiries from potential purchasers and Dundon expects to shortly develop a marketing process for the data.

17. The data likely contains non-public personal information of employees and potentially of consumers. Accordingly, any transfer would require the data to be "deidentified" – by removing personal information and would be subject to applicable federal and state privacy laws. Accordingly, any sale may require the appointment of a consumer privacy ombudsman under section 332 of the Bankruptcy Code pursuant to section 363(b)(1)(B).

F. Residual Interest in the Hudson Cove Portfolio

18. The Debtor has identified that it may be entitled to receive a contingent residual interest in the performance of a loan portfolio managed by Hudson Cove (the "Hudson Cove Portfolio"). The Debtor is entitled to receive a back-end promote from the Hudson Cove Portfolio if the portfolio performs to specified levels. Based on the reporting furnished to the Debtor, the amount accrued to the Debtor was approximately $36,200 as of August 31, 2026.

[1] For general discussion of the Spirit sale, *see, e.g.,* https://time.com/article/2026/08/25/google-spirit-airlines-ai-data-RL/ and https://www.reuters.com/legal/litigation/google-buy-spirit-airlines-business-data-10-million-2026-08-17/

G. Tax Attributes

19. Dundon has reviewed the potential to monetize the Debtor's tax attributes, primarily net operating losses. Similar to the CFL License, doing so would require a transaction as part of a plan of reorganization. After review, however, Dundon has determined that because of the structure of Debtor, there is no value to the Debtor's tax attributes.

H. Remnant Assets

20. The Debtor is in possession of certain intangible assets and payment rights, which are unrelated to its core business operations, often referred to as "remnant assets." The Debtor believes these assets also may have value and may be sold. Discussions regarding the potential for sale were recently begun.

I. Conclusion

21. The foregoing describes each category of asset of the Debtor's estate that Dundon has identified as potentially available for monetization. As noted above, this Supplemental Declaration expresses no view as to the value of these assets or the proceeds any of them would realize, and the Debtor has not yet determined how any of them will be monetized. I will supplement this Supplemental Declaration as additional information becomes available.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

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

/s/ Peter Hurwitz
Peter Hurwitz