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Proposed Special 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 **SUPPLEMENTAL DECLARATION OF EDWARD G. FATES IN SUPPORT OF DEBTOR'S APPLICATION TO RETAIN ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP AS SPECIAL CONFLICTS COUNSEL** [Relates to ECF Nos. 138-139] Judge: Hon. Barrett Marum Courtroom: 118

I, Edward G. Fates, hereby declare under penalty of perjury:

1. I am an attorney admitted to practice in the State of California, the United States District Court for the Southern District of California, and the United States Bankruptcy Court for the Southern District of California, and a partner of the law firm Allen Matkins Leck Gamble Mallory & Natsis LLP ("**Allen Matkins**"), proposed special conflicts counsel to CashCall, Inc. (the "**Debtor**"). I submit this supplemental declaration (the "**Supplemental Declaration**") in further support of the *Debtor's Application for Entry of an Order (I) Authorizing Retention and Employment of Allen Matkins Leck Gamble Mallory & Natsis LLP as Special Conflicts Counsel to the Debtor; and (II) Granting Related Relief* (the "**Application**"), and to supplement my prior declaration filed in support of the Application (the "**Original Declaration**"). Unless otherwise stated, I have personal knowledge of the facts set forth herein.[1]

2. On September 16, 2026, the Debtor filed the Application and the Original Declaration. *See* ECF Nos. 138-139.

3. After the Application was filed, the Debtor asked Allen Matkins to handle certain discrete issues relating to two pending cases involving the Consumer Financial Protection Bureau (the "**CFPB-Related Litigation Matters**"), and primarily with respect to the interpleader case commenced in July 2026.[2]

4. The Debtor's prior counsel in the CFPB-Related Litigation Matters also represents J. Paul Reddam ("**Reddam**"), and the conflicting interests of the Debtor and Reddam required conflicts counsel to act on behalf of the Debtor in those matters.

5. In particular, after the Debtor's bankruptcy petition was filed, counsel for Reddam filed an answer to the interpleader complaint on behalf of both Reddam

[1] Capitalized terms not otherwise defined herein have the meanings given to them in the Application or the Original Declaration.

[2] The two cases are *CFPB v. Cash Call, Inc. et al.*, Case No. 15-cv-07522-JFW (RAOx) and *Merchants Bank of Indiana v. CFPB et al.*, Case No. 26-cv-07259-JFW (RAOx), both pending in the United States District Court for the Central District of California.

and the Debtor, but did so without the knowledge or consent of the Debtor's current management.

6. Accordingly, the Debtor asked Allen Matkins to (a) make an appearance on the Debtor's behalf in the CFPB-Related Litigation Matters, (b) ensure that those cases are stayed as to the Debtor pursuant to the automatic stay under section 362(a) of the Bankruptcy Code, and (c) take appropriate steps to ensure that the answer improperly filed on the Debtor's behalf is withdrawn.

7. Therefore, in addition to the services described in the Application and the Original Declaration, Allen Matkins' services as special conflicts counsel to the Debtor will include handling issues associated with the CFPB-Related Litigation Matters that need to be addressed during the course of this Chapter 11 Case, including the matters described above.

8. The terms of Allen Matkins' proposed compensation, including the hourly rates and discounts described in the Original Declaration, will apply to the additional services described in this Supplemental Declaration and are otherwise unchanged.

9. Allen Matkins does not represent Reddam, nor any entity affiliated with or related to him, in the CFPB-Related Litigation Matters or otherwise. Allen Matkins' additional services described herein do not alter the disclosures made in the Original Declaration.

10. If Allen Matkins discovers additional information that requires disclosure, Allen Matkins will file a further supplemental declaration with the Court.

11. Based upon the above and the Original Declaration, I continue to believe that Allen Matkins is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and does not hold or represent any interest adverse to the Debtor's estate with respect to the matters on which Allen Matkins is to be employed.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 8, 2026, at San Diego, California.

/s/ Edward G. Fates
Edward G. Fates