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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

AMENDED DECLARATION OF EDWARD G. FATES IN SUPPORT OF DEBTOR'S AMENDED APPLICATION TO RETAIN ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP AS SPECIAL CONFLICTS COUNSEL

[Debtor's Application to Retain Allen Matkins Filed Concurrently]

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 amended declaration in support of the *Debtor's Amended 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**"). Unless otherwise stated, I have personal knowledge of the facts set forth herein. To the extent any information disclosed herein requires amendment or modification upon Allen Matkins' completion of further review, or as additional information regarding parties-in-interest becomes available, a supplemental declaration will be submitted to the Court reflecting such amended, supplemented, or otherwise modified information.

ALLEN MATKINS' QUALIFICATIONS

2. Allen Matkins is a full-service law firm with a multi-office bankruptcy, receiverships, and creditors' rights practice in five office locations throughout California, including San Diego, Orange County, Century City, Los Angeles, and San Francisco. Allen Matkins attorneys, including myself, regularly prosecute large fraudulent transfer claims and other complex avoidance actions in bankruptcy and receivership matters. Attorneys at Allen Matkins have served as counsel to debtors, trustees, creditors' committees, creditors, and various other parties in interest in numerous bankruptcy proceedings in multiple jurisdictions across the country.

3. I am the partner leading Allen Matkins' representation of the Debtor in this Chapter 11 Case. I have extensive experience representing clients in bankruptcy and insolvency matters, including fraudulent transfer litigation and

avoidance actions. A true and correct copy of my professional biography is attached to the Application as **Exhibit B**.

SERVICES TO BE PROVIDED

4. I have been advised by the Debtor that it wishes to obtain Court approval of the employment and retention of Allen Matkins as special conflicts counsel to render services in this Chapter 11 Case, including but not limited to:

- analyzing potential avoidance claims against J. Paul Reddam, the Debtor's former principal, and entities affiliated with or related to him;
- developing avoidance claims and related causes of action against J. Paul Reddam and entities affiliated with or related to him;
- prosecuting avoidance claims and related causes of action against J. Paul Reddam and entities affiliated with or related to him;
- appearing before this Court and any appellate courts in connection with the foregoing matters;
- as noted in my supplemental declaration filed on October 8, 2026, handling issues associated with the CFPB-Related Litigation Matters that need to be addressed during the course of this Chapter 11 Case; and
- performing other necessary legal services and providing all other necessary legal advice to the Debtor in connection with the foregoing matters.

PROFESSIONAL COMPENSATION

5. Allen Matkins has agreed to receive compensation and reimbursement of expenses in accordance with its standard billing practices, subject to this Court's approval, pursuant to the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any procedures or orders of the Court applicable to this chapter 11 case.

6. Allen Matkins has agreed to provide a 15% discount on my standard hourly rate and a 10% discount on all other attorneys' standard hourly rate for this

engagement. The names, positions and current (effective July 1, 2026) discounted hourly rates of the Allen Matkins attorneys currently expected to have primary responsibility for providing services to the Debtor are as follows:

Edward G. Fates, Partner	$896.75
Andrew Mina, Associate	$715.50

7. The hourly billing rates to be charged by Allen Matkins for services to be rendered to the Debtor in this Chapter 11 case shall be the same hourly billing rates as charged to its other, non-bankruptcy clients, less the applicable discounts described above.

8. Allen Matkins does not hold a prepetition claim against the Debtor.

9. Subject to the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any procedures or orders of the Court applicable to this Chapter 11 case, Allen Matkins has agreed to receive compensation at the hourly billing rates for legal and non-legal personnel and reimbursement for all reasonable and necessary expenses pursuant to the provisions of sections 330 and 331 of the Bankruptcy Code.

10. The hourly billing rates are set at a level designed to compensate Allen Matkins fairly for the work of its attorneys and professionals and to cover fixed and routine expenses. The hourly billing rates vary with the experience and seniority of the individuals assigned.

11. The hourly billing rates may change from time to time in accordance with Allen Matkins' established billing practices and procedures to reflect economic and other conditions, and generally adjust in July of each year. Allen Matkins will provide notice of any rate increases to the Debtor and the United States Trustee for the Southern District of California.

12. Allen Matkins, subject to orders of this Court, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the guidelines promulgated by the U.S. Trustee, as applicable, shall seek reimbursement of its expenses incurred in

connection with its representation of the Debtor in accordance with Allen Matkins' standard reimbursement policies. Allen Matkins' disbursement policies pass through all out-of-pocket expenses at actual cost or an estimated actual cost when the actual cost is difficult to determine. Other reimbursable expenses include, but are not limited to, filing fees, charges for transcripts, depositions, and messenger fees.

13. No promises have been received by Allen Matkins, or any partner, counsel, or associate thereof, as to payment or compensation in connection with this chapter 11 case other than in accordance with the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines, and such other procedures that have been or may be fixed by order of this Court. Allen Matkins has no agreement with any other entity to share with such entity any compensation received by Allen Matkins or by such entity.

ALLEN MATKINS' DISINTERESTEDNESS

14. In preparing this declaration, Allen Matkins searched its conflicts database for connections with (i) the Debtor; (ii) the Debtor's creditors, including the creditors identified by the Debtor ; (iii) other known parties in interest in this chapter 11 case, ; (iv) the respective attorneys and accountants of the foregoing parties, to the extent known; (v) the Office of the United States Trustee for Region 15; and (vi) each person employed in the Office of the United States Trustee for Region 15.

Based on that search, and to the best of my knowledge after diligent inquiry, neither Allen Matkins nor any partner, including myself, counsel, or associate of Allen Matkins has any connection, as such term is used in section 101(14) of the Bankruptcy Code and Bankruptcy Rule 2014(a)(2)(F), with (i) the Debtor, (ii) any creditor of the Debtor, (iii) any other party in interest in this chapter 11 case, (iv) the respective attorneys and accountants of the Debtor, its creditors, or any other party in interest, (v) the United States Trustee, or (vi) any person employed in the

Office of the United States Trustee, or with any judge of this Court. I know of no other connection of Allen Matkins to the Debtor or any other party in interest in this chapter 11 case.

15. As part of its practice, Allen Matkins appears in cases, proceedings, and transactions involving many different creditors, shareholders, attorneys, accountants, financial consultants, investment bankers, and other entities, some of which may be or may represent claimants and parties-in-interest in this chapter 11 case. Allen Matkins does not represent any such entity in connection with this chapter 11 case or have a relationship with any such entity or professionals that would imperil its disinterestedness.

16. If Allen Matkins discovers additional information that requires disclosure, Allen Matkins will file a supplemental disclosure statement with the Court.

17. Based upon the above, I believe that Allen Matkins is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and that Allen Matkins, its partners, counsel, and associates are not creditors, equity security holders, or insiders of the Debtor, and do not hold any interest adverse to the interests of Debtor's estate; are not and were not within two years before commencement of this chapter 11 case, managers or employees of the Debtor or other parties-in-interest; and do not have an interest materially adverse to the interest of the Debtor's estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor or this chapter 11 case, or for any other reason.

CONCLUSION

18. The Application requests approval of the Debtor's retention of Allen Matkins at a 15% discount on Edward G. Fates' hourly rate and a 10% discount on all other attorneys' hourly rates in effect at the time the services are rendered in accordance with Allen Matkins' normal reimbursement policies, subject to any

modifications to such policies that Allen Matkins may be required to make to comply with orders of this Court, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the U.S. Trustee Guidelines, as applicable.

19. Subject to these terms and conditions, Allen Matkins intends to apply, pursuant to sections 330 and 331 of the Bankruptcy Code, for allowances of compensation for professional services rendered in this chapter 11 case and for reimbursement of actual and necessary expenses incurred in connection therewith in accordance with the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the U.S. Trustee Guidelines, as applicable.

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

Executed on October 14, 2026, at San Diego, California.

/s/ Edward G. Fates
Edward G. Fates

EDWARD G. FATES (BAR NO. 227809)
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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 **AMENDED DECLARATION OF EDWARD G. FATES IN SUPPORT OF DEBTOR'S AMENDED APPLICATION TO RETAIN ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP AS SPECIAL CONFLICTS COUNSEL** [Debtor's Application to Retain Allen Matkins Filed Concurrently] Judge: Hon. Barrett Marum Courtroom: 118

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13. No promises have been received by Allen Matkins, or any partner, counsel, or associate thereof, as to payment or compensation in connection with this chapter 11 case other than in accordance with the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines, and such other procedures that have been or may be fixed by order of this Court. Allen Matkins has no agreement with any other entity to share with such entity any compensation received by Allen Matkins or by such entity.

ALLEN MATKINS' DISINTERESTEDNESS

14. ~~Based on a search conducted by Allen Matkins,~~In preparing this declaration, Allen Matkins searched its conflicts database for connections with (i) the Debtor; (ii) the Debtor's creditors, ~~to~~including the ~~best~~creditors identified by the Debtor ~~of my knowledge, neither Allen Matkins, nor any partner~~; (iii) other known parties in interest in this chapter 11 case, ~~including myself, counsel, or associate, has any connection with the Debtor~~; (iv) the respective attorneys and accountants of the foregoing parties, to the extent known; (v) the Office of the United States Trustee for Region 15; and (vi) each person employed in the Office of the United States Trustee for Region 15. ~~In addition~~

Based on that search, and to the ~~foregoing, through~~best of my knowledge after diligent inquiry, ~~I have ascertained no~~neither Allen Matkins nor any partner, including myself, counsel, or associate of Allen Matkins has any connection, as such term is used in section 101(14) of the Bankruptcy Code and Bankruptcy Rule 2014(a)(2)(F), ~~between Allen Matkins and~~with (i) the Debtor, (ii) ~~the Office~~any

creditor of the ~~U.S. Trustee or~~Debtor, (iii) any ~~person employed by the Office of the U.S. Trustee,~~other party in interest in this chapter 11 case, ~~(ii~~(iv) ~~any~~the respective attorneys~~,~~ and accountants of the Debtor, its creditors, or ~~financial consultants~~any other party in ~~this chapter 11 case,~~interest, (v) the United States Trustee, or (~~iii~~)vi) any ~~claimants or other~~person employed ~~parties~~ in~~ interest in this chapter 11 case,~~ the Office of the United States Trustee, or ~~(iv)~~with any judge~~s~~ of this Court.~~-~~ I know of no other connection of Allen Matkins to the Debtor or any other party in interest in this chapter 11 case.

15. As part of its practice, Allen Matkins appears in cases, proceedings, and transactions involving many different creditors, shareholders, attorneys, accountants, financial consultants, investment bankers, and other entities, some of which may be or may represent claimants and parties-in-interest in this chapter 11 case. Allen Matkins does not represent any such entity in connection with this chapter 11 case or have a relationship with any such entity or professionals that would imperil its disinterestedness.

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CONCLUSION

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19. Subject to these terms and conditions, Allen Matkins intends to apply, pursuant to sections 330 and 331 of the Bankruptcy Code, for allowances of compensation for professional services rendered in this chapter 11 case and for reimbursement of actual and necessary expenses incurred in connection therewith in accordance with the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the U.S. Trustee Guidelines, as applicable.

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

Executed on ~~October 13, 2026~~October 13, 2026, at San Diego, California.

Edward G. Fates