HAEJI HONG, ATTORNEY #198503
TRIAL ATTORNEY
OFFICE OF THE UNITED STATES TRUSTEE
880 Front Street, Suite 3230
San Diego, CA 92101
(619) 557-5013

Attorney for
TIFFANY L. CARROLL
ACTING UNITED STATES TRUSTEE

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re: CASHCALL, INC.. Debtor-in-Possession.	Case No.: 26-03102-JBM11 EX PARTE MOTION FOR PERMISSION TO FILE DECLARATION OF MICHELLE M. KAINEN IN SUPPORT OF ACTING UNITED STATES TRUSTEE'S RESPONSE TO SUPPLEMENTAL BRIEF Date: November 4, 2026 Time: 10:00 A.M. Dept: Two (2) Judge: J. Barrett Marum

The Acting United States Trustee ("UST") has until October 20, 2026 to file a Response to Supplemental Brief in Support of Application to Employ Manatt, Phelps & Phillips LLP ("Manatt") as Counsel to the Debtor Pursuant to the Order Directing Supplemental Briefing re Application to Employ Manatt. The Court's Order Directing Supplemental Briefing re Application to Employ Manatt as Debtor's Counsel (the "Order") as Docket No. 152 allows the UST to file a supplemental brief that cannot exceed 15 pages. The UST requests permission to file Declaration of Michelle M. Kainen in Support of Acting United States Trustee's Response to Supplemental Brief in Support of Application to Employ Manatt, Phelps & Phillips LLP as Counsel to the Debtor Pursuant to the Order ("Kainen Dec") substantially in form attached hereto as **Exhibit 1,** which would better inform this Court regarding the UST's review and analysis of assets and support the UST's expected 15-page response to Manatt's supplemental brief filed

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as Docket No. 194. There would be no prejudice to parties as Kainen Dec does not supply additional legal authorities but analysis of the assets.

WHEREFORE, the UST respectfully requests permission to file Kainen Dec to support UST's expected 15-page response to be filed by October 20, 2026.

Respectfully submitted,

TIFFANY L. CARROLL
ACTING UNITED STATES TRUSTEE

Dated: October 19, 2026

By: /s/ Haeji Hong
Haeji Hong,
Attorney for the Acting United States Trustee

Exhibit 1

HAEJI HONG, ATTORNEY #198503
TRIAL ATTORNEY
OFFICE OF THE UNITED STATES TRUSTEE
880 FRONT STREET, SUITE 3230
SAN DIEGO, CA 92101-8511
(619) 557-5013

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TIFFANY L. CARROLL
ACTING UNITED STATES TRUSTEE

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re: CASHCALL, INC., Debtor-in-Possession,	Case No.: 26-03102-JBM11 DECLARATION OF MICHELLE M. KAINEN IN SUPPORT OF THE ACTING UNITED STATES TRUSTEE'S RESPONSE TO SUPPLEMENTAL BRIEF IN SUPPORT OF APPLICATION TO EMPLOY MANATT, PHELPS & PHILLIPS LLP AS COUNSEL TO THE DEBTOR PURSUANT TO THE ORDER DIRECTING SUPPLEMENTAL BRIEFING RE APPLICATION TO EMPLOY MANATT, PHELPS & PHILLIPS, LLP AS DEBTOR'S COUNSEL Date: November 4, 2026 Time: 10:00 a.m. Dept: Two (2) Judge: Hon. J. Barrett Marum

I, Michelle M. Kainen, declare as follows:

1. I am a Bankruptcy Supervisory Auditor employed by the United States Department of Justice in the Office of the United States Trustee ("United States Trustee"), San Diego office. I have a Master of Science degree in Accountancy from San Diego State University. I am licensed as a Certified Public

Accountant by the California Board of Accountancy. I am also a Certified Insolvency and Restructuring Advisor (CIRA).

2. As part of my duties as a Bankruptcy Supervisory Auditor, I am responsible for the supervision of Chapter 11 cases in the Office of the United States Trustee, Region 15. This supervision includes monitoring Chapter 11 cases; reviewing petitions, schedules, statements, and related documents, and pleadings filed by a Chapter 11 debtor and other parties in interest; conducting the Initial Debtor Interview and requesting documents related to the Interview; reviewing Monthly Operating Reports; monitoring plans and disclosure statements; and such other actions as the United States Trustee deems appropriate.

3. On August 24, 2026, I conducted the Initial Debtor Interview ("IDI") in this case. During the IDI, the Debtor's general counsel, Dan Baren, informed me that the following entities referenced in the Debtor's Statement of Financial Affairs are solely owned by John Paul Reddam: Ralis Services Corporation, Servicing Solutions, LLC, Jasper, Lender's Choice Escrow, Rebate Media Buyers, Lenders National Real Estate Solutions, Loan Exchange, LLC, and Absolutely Zero Corp.

4. Also during the IDI, the Debtor's Chief Financial Officer, Del Meeks, explained that in May and June 2026, the Debtor sold three tranches of loans to Absolutely Zero. When I inquired about the basis for selecting which loans would be sold versus retained, Mr. Meeks stated that the loans sold were those meeting specific performance criteria, and that the loans retained did not meet those criteria. There was no independent valuation performed of the tranches of loans sold.

5. At my request, the Debtor provided **Exhibit 1**, which includes a further breakdown of the amount listed on Schedule A/B, Line 11.

6. Pursuant to the Court's Order Directing Supplemental Briefing re Application to Employ Manatt, Phelps & Phillips, LLP as Debtor's Counsel ("Order") entered on September 18, 2026 as Docket No. 152, Dundon Advisors LLC ("Dundon") was directed to file a supplemental declaration addressing the Debtor's potential to monetize its loan portfolio and the additional assets identified during the September 17, 2026 hearing.

7. On October 7, 2026, Peter Hurwitz submitted the required declaration on behalf of Dundon (the "Hurwitz Declaration").

8. The Hurwitz Declaration did not identify the declarant's qualifications. The Hurwitz Declaration also omitted any discussion of the Debtor's largest asset (a fraudulent conveyance action) and did not address the potential monetization of most of the remaining assets. The chart below sets forth the assets identified in the Hurwitz Declaration:

Assets	Amount
Loan Portfolio - Principal Balance, accrued interest and fees - no liquidation	1,226,500.00
California Finance Lender License	Unvalued
Website, Doman Name and Telephone	Unvalued
Customer lists	Unvalued
Data, AI	Unvalued
Residual Interest in Hudson Cove Portfolio vested as of 8/31/26,	36,200.00
Tax Attributes	No value
Remnant Asset - intangible assets and payment rights	"Discussions regarding the potential for sale were recently begun."
Total	$ 1,262,700.00

9. In addition to the assets discussed in the Hurwitz Declaration, I reviewed the schedules, statements, and pleadings filed in this matter and determined that the estate may have additional assets beyond that which was identified in the Hurwitz Declaration.

10. Based on the schedules, statements, pleadings, information provided during the IDI, and **Exhibit 1**, I have categorized those potential assets as related or unrelated to John Paul Reddam, as follows:

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Source	Description	Potential Value Reddam-related	Potential Value Unrelated to Reddam
Schedule A/B Part 1	Cash and accounts		149,064.84
Schedule A/B Part 7	Furniture, fixtures and equipment		Unknown
Sch. A/B, Part 3, Line 11b Exhibit	Accounts Receivable - Misc. (Funds provided to Absolutely Zero for CFPB case)	2,546,025.05	
Sch. A/B, Part 3, Line 11b Exhibit	Accounts Receivable - Ralis	5,531.57	
Sch. A/B, Part 3, Line 11b Exhibit	Accounts Receivable - Servicing Solutions (Texas Rent)	590,661.95	
Sch. A/B, Part 3, Line 11b Exhibit	Accounts Receivable - Absolutely Zero	2,426.89	
ECF 18 page 2	Fraudulent transfer action - *De La Torre v. John Paul Reddam* , Orange County Superior Court 30-2024-01421309-CU-NP-NJC	45,293,217.90	
SOFA Line 3.1	Payment to Ralis Services	292,760.44	
SOFA Line 4.1	Ralis Services Corporation	1,107,289.51	
SOFA Line 4.2	Servicing Solutions, LLC	132,035.00	
SOFA Line 4.3	Absolutely Zero Corp.	903,623.09	
SOFA Line 4.4	Jasper	379,985.44	
SOFA Line 4.5	Law Office of Jordana Gilden		5,470.20
SOFA Line 4.6	Lender's Choice Escrow	555.00	
SOFA Line 4.7	Rebate Media Buyers	104,478.56	
SOFA Line 4.8	Lenders National Real Estate Solutions	112.00	
SOFA Line 4.9	Loan Exchange, LLC	630.00	
SOFA Line 4.10	Dan Baren		14,614.02
SOFA Line 13.1	Absolutely Zero Corp.	273,856.67	
SOFA Line 13.2	Absolutely Zero Corp.	62,292.38	
SOFA Line 13.3	Absolutely Zero Corp.	845,357.81	
	Total	$ 52,540,839.26	$ 169,149.06

11. Based on the above charts, the breakdown between Reddam-related assets and non-Reddam-related assets is as follows:

Source	Potential Value Reddam-related	Potential Value Unrelated to Reddam
Assets from Hurwitz Declaration	$ -	$ 1,262,700.00
Additional assets from statements, schedules and pleadings	52,540,839.26	169,149.06
Total	**$ 52,540,839.26**	**$ 1,431,849.06**

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Executed this 15th day of October, 2026 in Concord, NH.

Michelle Kainen
Supervisory Auditor

EXHIBIT 1

EXHIBIT

Schedule A/B, Part 3, Line 11b - Accounts Receivable Over 90 Days Old

Reconciliation of Reported Net Book Value of $4,402,653.56 as of the Petition Date

Description	Amount ($)	Subtotal ($)	Reference / Notes
Residual Loan Portfolio (Loans Receivable)			
Mortgage	24,439.79		
Small Business Loans (SBL)	42,534.81		
Consumer	1,265,669.50		
Face amount of residual loan portfolio	*1,332,644.10*		Face Value
Less: Fair Market Value adjustment	(74,636.00)		
Net residual loan portfolio		**1,258,008.10**	
Booked Accounts Receivable			
Accounts Receivable – Misc	2,546,025.05		Funds provided to Absolutely Zero for CFPB case
Accounts Receivable – Ralis	5,531.57		
Accounts Receivable – Servicing Solutions	590,661.95		Texas rent
Accounts Receivable – Absolutely Zero	2,426.89		
Total booked accounts receivable		**3,144,645.46**	
Reported net book value		**4,402,653.56**	

Note: The residual loan portfolio is reported at a face amount of $1,332,644.10, against which the Debtor has recorded a Fair Market Value adjustment of $74,636.00, yielding a net amount of $1,258,008.10. That net amount, when consolidated with booked Accounts Receivable of $3,144,645.46, results in the reported net book value of $4,402,653.56. This presentation reflects the Debtor's historical charge-off and reserve policies and is not an admission that any portion of the portfolio is uncollectible; the Debtor reserves all rights to collect, sell, or otherwise realize upon the portfolio. Loan sales completed before the Petition Date are disclosed in response to SOFA Question 13, and the gain recognized on those sales is reported in response to SOFA Question 2. Amounts ultimately collected may differ materially from net book value.

CSD 1001A [07/01/18]
Name, Address, Telephone No. & I.D. No.

HAEJI HONG, ATTORNEY NO. 198503
TRIAL ATTORNEY
OFFICE OF THE UNITED STATES TRUSTEE
880 FRONT STREET, SUITE 3230
SAN DIEGO, CA 92101
(619) 557-5013

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

In Re
CASHCALL, INC.,

Debtor.

BANKRUPTCY NO. 26-03102-JBM11

Date of Hearing: Ex Parte
Time of Hearing: Ex Parte
Name of Judge: J. Barrett Marum

ORDER ON EX PARTE MOTION FOR PERMISSION TO FILE DECLARATION OF MICHELLE M. KAINEN IN SUPPORT OF ACTING UNITED STATES TRUSTEE'S RESPONSE TO SUPPLEMENTAL BRIEF

The court orders as set forth on the continuation pages attached and numbered two (2) through two (2) with exhibits, if any, for a total of two (2) pages. Motion/Application Docket Entry No. 218 .

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DATED:

Judge, United States Bankruptcy Court

This matter came before the Court on the Ex Parte Motion for Permission to File Declaration of Michelle M. Kainen in Support of Acting United States Trustee's Response to Supplemental Brief ("Motion"). Based upon the Motion, and for good cause,

IT IS HEREBY ORDERED that:

The Motion is approved.

The Office of the United States Trustee is permitted to file Declaration of Michelle M. Kainen in Support of Acting United States Trustee's Response to Supplemental Brief in Support of Application to Employ Manatt, Phelps & Phillips as Counsel to the Debtor Pursuant to the Order Directing Supplemental Briefing re Application to Employ Manatt, Phelps & Phillips LLP ("Kainen Dec") substantially in the form attached as **Exhibit 1** attached to the Motion, in addition to the 15-page supplemental brief authorized by the Order Directing Supplemental Briefing re Application to Employ Manatt, Phelps & Phillips as Debtor's Counsel entered as Docket No. 152.