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UNITED STATES BANKRUPTCY COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

In re:	Case No. 26-03102-JBM11
CASHCALL, INC.,	Chapter 11
Debtor.	**DEBTOR'S MOTION FOR ENTRY OF AN ORDER EXTENDING THE DEBTOR'S EXCLUSIVE PERIODS TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**
	Date: December 16, 2026 Time: 11:00 a.m. Courtroom: 118 Dept: 2 Name of Judge: Judge J. Barrett Marum

TO THE HONORABLE J. BARRETT MARUM, UNITED STATES BANKRUPTCY JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE; THE ATTORNEYS FOR THE CFPB; THE ATTORNEYS FOR MR. DE LA TORRE; COUNSEL FOR THE DIP LENDER; THOSE PERSONS WHO HAVE FORMALLY APPEARED AND REQUESTED NOTICE AND SERVICE IN THIS PROCEEDING PURSUANT TO BANKRUPTCY RULES 2002 AND 3017; and ALL

GOVERNMENTAL AGENCIES HAVING A REGULATORY OR STATUTORY INTEREST IN THIS CHAPTER 11 CASE:

CashCall, Inc. (the "Debtor"), the debtor and debtor-in-possession, hereby submits this Motion (the "Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), extending the Debtor's exclusive periods to file a chapter 11 plan and solicit acceptances thereof.

In further support of this Motion, the Debtor respectfully represents as follows:

I. INTRODUCTION

As the Court is aware, during the initial phase of this case, the Debtor's attention has been primarily focused on threshold matters, including obtaining postpetition financing, retaining its professionals, and responding to challenges raised by the CFPB and Mr. de la Torre—that remain pending. This has delayed efforts to beginning discussions toward a plan. Once these threshold disputes are resolved, the Debtor will next focus on completing its evaluation of strategic alternatives. The Debtor expects to use the requested extension to evaluate the claims pool, complete its assessment of estate assets, the potential to continue operating its business profitably, claims and causes of action, and engage with creditors and other stakeholders to attempt to reach a consensual path forward. Accordingly, the Debtor requests a brief extension of exclusivity.

II. BACKGROUND

On July 20, 2026 (the "Petition Date"), the Debtor filed a voluntary petition under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of California (the "Court"). An official committee of unsecured creditors has not been appointed due to an insufficient number of unsecured creditors willing or able to serve [Docket No. 40].

On July 21, 2026, the Court issued its Notice of Chapter 11 Bankruptcy Case. [Docket No. 11.] The notice set September 28, 2026 as the deadline for non-governmental creditors to file proofs of claim (the "Bar Date") and January 19, 2027 as the deadline for governmental entities to do the same (the "Governmental Bar Date"). The meeting of creditors under section 341 of the Bankruptcy Code was held on October 15, 2026.

1. The Debtor's Business

The Debtor continues to operate its business and manage its property as a debtor in possession under sections 1107 and 1108 of the Bankruptcy Code. The Debtor is a licensed finance lender by the California Department of Financial Protection and Innovation. Its principal business is in providing unsecured loans to borrowers with poor credit histories. A detailed description of the Debtor and its business, the facts and circumstances leading up to this filing, and the facts supporting this Motion are set forth in greater detail in the *Declaration Of J. Paul Reddam In Support Of Debtor's Chapter 11 Petition And First Day Pleadings* [Docket No. 3] and the *Declaration Of Leslie Gladstone In Support Of Debtor's Chapter 11 Petition And First Day Pleadings* [Docket No. 4].

2. The Bankruptcy Case

Prior to the Petition Date, the Debtor appointed independent fiduciaries to manage the chapter 11 process. Leslie Gladstone was appointed as the Chief Restructuring Officer (the "CRO"). Craig Jalbert was appointed as Independent Director and formed a special committee of the board, of which he is the sole member, with sole and exclusive responsibility for all matters involving insiders and related parties [Docket No. 28]. On September 17, 2026, the Court entered orders (a) approving the retention of Financial Law Group to provide a chief restructuring officer and designating Leslie T. Gladstone as Chief Restructuring Officer [Docket No. 147] and (b) authorizing the retention of Dundon Advisers, LLC as financial advisor [Docket No. 148].

Since the Petition Date, the Debtor has worked to retain professionals necessary to administer this chapter 11 case. The Debtor filed an application to retain Manatt, Phelps & Phillips, LLP ("Manatt") as its general bankruptcy counsel [Docket No. 42]. The Debtor owns claims against J. Paul Reddam and related entities. In addition, there are certain other relationships between the Debtor and related entities. Manatt represented Reddam and certain related entities. Accordingly, the Debtor also filed an application to retain Allen Matkins Leck Gamble Mallory & Natsis LLP as special conflicts counsel. [Docket No. 138.] The United States Trustee and proposed counsel are continuing to work toward resolution of remaining issues concerning the Debtor's retention applications. The Debtor's application to retain Manatt is scheduled to be heard on November 12, 2026 [Docket No, 189].

On the Petition Date, the Debtor filed its first day motions, including a Motion to Obtain

Postpetition Financing from an insider entity that shares common ownership with the Debtor and to use cash collateral [Docket No. 5] (the "DIP Motion"). The Court heard the DIP Motion on shortened time on July 28, 2026 and granted limited interim relief on certain conditions [Docket No. 30]. Thereafter, the Court approved the DIP Financing on a final basis and on September 14, 2026, the Court issued its *Memorandum Decision on the Debtor's Motion to Obtain Postpetition Financing* on September 14, 2026 [Docket No. 126]. On September 16, 2026, the CFPB moved for reconsideration of the Court's modified order on the DIP Motion [Docket No. 140] (the "Reconsideration Motion"), which remains pending and is to be heard on November 12, 2026 [Docket No. 224].

Since commencing this chapter 11 case, the Debtor has also met its reporting obligations. It filed amended schedules of assets and liabilities on September 22 and September 28, 2026 [Docket Nos. 159, 169], monthly operating reports [Docket No. 75, 129, 172 and 238], and a periodic report on the entities in which the estate holds a substantial or controlling interest [Docket No. 168].

In addition, several contested matters filed by creditors are pending. On September 14, 2026, Mr. de la Torre moved to dismiss this chapter 11 case [Docket Nos. 127, 130] (the "Motion to Dismiss"). The CFPB filed a partial joinder [Docket No. 178]. The Debtor and the Acting United States Trustee filed responses on October 14, 2026 [Docket Nos. 207, 203]. Mr. de la Torre also moved for relief from the automatic stay to pursue the Fraudulent Transfer Case [Docket No. 164] (the "Stay Relief Motion"), which the Debtor opposed [Docket No. 198]. The Motion to Dismiss and the Stay Relief Motion remain pending and are to be heard on November 12, 2026 [Docket No. 224].

III. JURISDICTION AND VENUE

This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory bases for the relief requested herein are section 1121(d) of the Bankruptcy Code, Bankruptcy Rule 9006, and Local Rule 9006-1.

IV. RELIEF REQUESTED

Pursuant to section 1121(d) of the Bankruptcy Code, the Debtor moves for entry of an order (the "Proposed Order"), in substantially the form attached hereto as **Exhibit A**:

a. Extending the period during which the Debtor has the exclusive right to file a chapter 11 plan (the "Exclusive Filing Period") by ninety (90) days through and including February 15, 2027; and

b. Extending the period during which the Debtor has the exclusive right to solicit acceptances thereof (the "Exclusive Solicitation Period" and together with the Exclusive Filing Period, the "Exclusive Periods") by ninety (90) days through and including April 19, 2027.

Without granting the extensions sought herein, the Debtor's Exclusive Filing Period and Exclusive Solicitation Period will expire November 17, 2026 and January 19, 2027, respectively.

V. BASIS FOR RELIEF

Section 1121(d) of the Bankruptcy Code states that "on request of a party in interest made . . . and after notice and a hearing, the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section." 11 U.S.C. § 1121(d). This Motion is timely as the Exclusive Periods have not yet expired.

The decision to extend a debtor's exclusivity periods is left to the discretion of the bankruptcy court and is fact driven. *See In re Henry Mayo Newhall Mem'l Hosp.*, 282 B.R. 444, 452 (Bankr. 9th Cir. 2002).

Although the Bankruptcy Code does not define the term "cause," courts rely on various factors to determine whether cause exists to extend a debtor's exclusivity period, including:

1. the size and complexity of the case;
2. the necessity for sufficient time to permit the debtor to negotiate a plan of reorganization and prepare adequate information;
3. the existence of good faith progress towards reorganization;
4. the fact that the debtor is paying its debts as they become due;
5. whether the debtor has demonstrated reasonable prospects for filing a viable plan;
6. whether the debtor has made progress in negotiations with creditors;
7. the length of time which has elapsed in the case;

8. whether the debtor is seeking an extension of exclusivity in order to pressure creditors to submit to the debtor's reorganization demands; and

9. whether an unresolved contingency exists.

In re Nats., 669 B.R. 326, 337 (Bankr. C.D. Cal. 2025). Not all of these factors are relevant to every case, and courts use only the relevant subset of these factors to determine whether cause exists in a particular chapter 11 case. *See In re Hoffinger Indus., Inc.*, 292 B.R. 639, 644 (Bankr. 8th Cir. 2003).

Based on a weighing of the relevant factors, there is sufficient cause to approve the extension of the Exclusive Periods requested by the Debtor based on the following:

a. During the first months of this case, the Debtor has been required to address threshold matters that bear directly on the form and feasibility of any plan, including objections to the retention of the CRO and the Debtor's professionals, the CFPB's Reconsideration Motion, the DIP Motion, the Motion to Dismiss, and the Stay Relief Motion. These matters have required substantial attention and bear on the Debtor's available financing and the manner in which estate claims and causes of action may be administered.

b. The CFPB's Reconsideration Motion challenges the order on which the Debtor's postpetition financing rests. Until it is resolved, the Debtor cannot responsibly assess the financing available to support operations or a proposed plan.

c. The Motion to Dismiss and the Stay Relief Motion also bear directly on whether, and in what form, this case will proceed and how estate claims and causes of action will be administered. The claim asserted in the Fraudulent Transfer Case is property of the estate. The Debtor is still assessing whether substantial recoveries can be realized from that claim in the near term and whether other valuable litigation claims exist. Filing a plan while those motions are pending would waste estate resources and could require substantial revision once the Court rules.

d. The Debtor also requires additional time to assess the filed claims, forthcoming governmental claims, and potential estate causes of action before proposing a meaningful classification and distribution scheme. The deadline for non-governmental claims passed only on September 28, 2026, and the Governmental Bar Date is not until January 19, 2027. The CFPB, a governmental unit, holds one of the two substantial judgments against the Debtor. In addition, the CFPB is seeking to recover against collateral. The resolution of these efforts likely will have a substantial impact on the terms of a plan. Until governmental claims are filed and the Debtor and its

advisors have reconciled the filed claims, the Debtor cannot propose a meaningful distribution scheme or classification structure.

e. The retention of the Debtor's general bankruptcy counsel and conflicts counsel remain pending. Once these professionals are engaged, the Debtor will be positioned to analyze its assets, liabilities, and potential estate causes of action and to formulate a plan.

f. Since the Petition Date, the Debtor has continued to pay substantially all of its post-petition expenses and invoices in the ordinary course of business or as otherwise provided by order of the Court. The Debtor has also filed and amended its schedules, filed its operating and periodic reports, appeared at the meeting of creditors, and responded promptly to every contested matter.

g. The Debtor is not seeking an extension of the Exclusive Periods to pressure or prejudice any of its stakeholders. Rather, the Debtor is seeking an extension of the Exclusive Period to secure adequate time to develop a plan of reorganization.

h. The requested extension is the Debtor's first request, is limited in duration, and is not sought to pressure creditors. There has been no prior extension of the Exclusive Periods, and this request comes less than four months after the Petition Date.

The relevant factors described above support the Debtor's requested extension of the Exclusive Periods. Extending the Exclusive Periods by ninety (90) days will ensure that the Debtor and its creditors are able to capitalize on the progress it has made to date in this matter. Further, the requested extension is within the range of similar relief granted by courts under similar circumstances. *See, e.g., Henry Mayo Newhall*, 282 B.R. at 452-53 (affirming initial extension of exclusivity where it would "facilitate moving the case forward toward a fair and equitable resolution" because the parties were at the preliminary stage in discussions of a consensual plan)*; Matter of Newark Airport/Hotel Ltd. P'ship*, 156 B.R. 444 (Bankr. D.N.J.) (granting an initial extension of the debtor's exclusivity periods where the debtor's early case had been consumed by creditor motions, cash-collateral disputes, and unresolved matters affecting plan formulation).

Accordingly, cause exists for the requested extension of exclusivity.

VI. NO PREVIOUS REQUEST

No previous request for the relief sought herein has been made to this or any other court in

connection with this chapter 11 case.

VII. NOTICE

Notice of this Motion has been provided to: (i) the Office of the United States Trustee; (ii) the attorneys for the CFPB; (iii) the attorneys for Mr. de la Torre; (iv) counsel for the DIP Lender; (v) those persons who have formally appeared and requested notice and service in this proceeding pursuant to Bankruptcy Rules 2002 and 3017; and (vi) all governmental agencies having a regulatory or statutory interest in this chapter 11 case. No other or further notice need be provided.

VIII. CONCLUSION

WHEREFORE, the Debtor respectfully requests that the Court grant this Motion, enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, and grant such other and further relief as the Court deems just and proper.

Dated: November 4, 2026

MANATT, PHELPS & PHILLIPS, LLP

By: */s/ Schuyler Carroll*

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Proposed Counsel to the Debtor and Debtor-in-Possession

CSD 1001A [07/01/18]

Name, Address, Telephone No. & I.D. No.

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

In Re Debtor.	BANKRUPTCY NO. Date of Hearing: Time of Hearing: Name of Judge:

ORDER ON

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

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DATED:

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Judge, United States Bankruptcy Court

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ORDER ON
DEBTOR: CASE NO: