Richard J. Reynolds (SBN 89911)
E-mail: rreynolds@bwslaw.com
Joseph P. Buchman (SBN 148983)
E-mail: jbuchman@bwslaw.com
Martin Kosla (SBN 247224)
E-mail: mkosla@bwslaw.com
BURKE, WILLIAMS & SORENSEN, LLP
444 South Flower Street, 40th Floor
Los Angeles, California 90071-2942
Tel: 213.236.0600 Fax: 213.236.2700

Attorneys for Diablo Grande Community Facilities District No. 1

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

In re DIABLO GRANDE COMMUNITY FACILITIES DISTRICT NO. 1, Debtor.	Case No. 25-26635-A-9 DCN BWS- 001 **DECLARATION OF JOSEPH BUCHMAN IN SUPPORT OF DEBTOR'S OPPOSITION TO KOSHI PADNANI'S MOTION TO EXTEND TIME TO FILE OBJECTION TO CHAPTER 9 PETITION** Date: November 18, 2026 Time: 9:30 A.M. Ctrm: Dept. A, Ctrm 11 2500 Tulare Street, Fresno California

DECLARATION OF JOSEPH P. BUCHMAN

I, Joseph P. Buchman, declare as follows:

1. I am over the age of 18 and am not a party to this action. I am an attorney with the law firm of Burke, Williams & Sorensen, LLP, attorneys for Diablo Grande Community Facilities District No. 1 (the "**Debtor**"). I submit this Declaration in support of the Debtor's Opposition to Koshi Padnani's Motion To Extend Time to File Objection to Chapter 9 Petition [Dkt. 138] (the "Motion").

2. The Bankruptcy Case was commenced by the filing of the Debtor's Bankruptcy Petition on November 25, 2025 (the "**Petition**") [25-26635 Dkt. 1], after the Debtor's governing

authority, the Board of the Western Hills Water District (the "**Board**"), declared a fiscal emergency of the Debtor [25-26635 Dkt. 4

3. On February 4, 2026, the Bankruptcy Court approved the form of Notice of Commencement of Chapter 9 Bankruptcy Case and set April 3, 2026, as the deadline for filing objections to the Chapter 9 Petition [25-26635 Dkt. 23].

4. On March 12, 2026, the Debtor submitted its evidence proving service and publication of the Notice of Commencement of Chapter 9 Bankruptcy Case in accordance with the Court's February 4, 2026 Order [25-26635 Dkt. 28, 29, 30, 31, 32, 33].

5. Pursuant to the Court's Order [25-26635 Dkt. 23], objections to the Chapter 9 petition were due not later than April 3, 2026. This deadline was duly noticed as part of the Notice of Commencement of Chapter 9 Case. On April 3, 2026, the County of Stanislaus, California (the "**County**") filed an Objection to the Chapter 9 Petition (the "**Objection**") [25-26635 Dkt. 43]. No other creditor or interested party filed an objection.

6. On August 19, 2026, the Debtor and the County filed a Joint Report For Status Conference [25-26635 Dkt. 81] which reported to the Court that they had reached an Agreement for the County to withdraw its Objection subject to the terms of the Settlement Agreement.

7. On October 7, 2026, the County and Debtor filed a Stipulation To Withdraw Objection To Chapter 9 Petition And Dismiss Contested Matter Per FRBP 7041 And FRCP 41(a)(1)(a)(ii) [25-26635 Dkt. 121]. Consequently, the only timely objection to the Chapter 9 Petition has been withdrawn.

8. The deadline for filing an objection to the Petition was duly set and noticed for April 3, 2026. Padnani's did not file an objection to the Petition until September 15, 2026 [Dkt. 97], with duplicate versions later filed on October 9, 2026 [Dkt. 122], October 17, 2026 [Dkt 134], and October 22, 2026 [Dkt. 137]. As best I can determine, the version of the Objection filed at Dkt. 137 is the most complete and intelligible.

9. On August 26, 2026, at the hearing on the Status Conference following the Debtor and County reaching a settlement on the County's Objection, Padnani appeared *in pro per* and

announced that she objected to the Petition as well. During the hearing, after the Court acknowledged the settlement, the following colloquy ensued:

> Court: Ms. Padnani, did you have something you wanted to say?
>
> Padnani: Yes, I was under the assumption that even I have filed an objection to this discharge or the Chapter 9 bankruptcy, and hopefully you will take that into consideration because I don't have a lawyer and I don't know all the legal aspects, but I do know that it's not right that fraud has been committed and some evidence must have been gathered during the discovery process by Mr. Cruse and that is why he's getting the settlement. But I will do an objection to the discharge or the bankruptcy by filing an adversary complaint if they are allowed this bankruptcy by Chapter 9 because otherwise they can resolve this dispute by settling with me the monies they owe me which is $26,000.

Court Docket 86, Hearing Recording at timestamp 1:14—2:22. The Court is requested take judicial notice of this recording of the hearing pursuant to FRE 201.

10. At the August 26, 2026 hearing, the Court went on to clarify that Ms. Padnani had filed a proof of claim and not an objection. However, it is apparent from Ms. Padnani's initial admissions quoted above that (1) she had made a mistake of law in thinking her proof of claim was an objection to the Petition, (2) that she thinks the only reason the Debtor settled with the County is to hide some evidence of fraud uncovered by the County, and (3) that the Debtor can avoid having to address her dispute if the Debtor will agree to pay her the $26,000 she claims is owed to her. Those "reasons" for not filing a timely objection are insufficient as a matter of law and were expressed before Padnani learned the requirements for a legally recognized basis for an extension of time. Padnani's purported health justifications for not being able to file a timely objection smack of simple malingering and are not supported by relevant or admissible evidence.

11. The Court's docket, commencing with Dkt. 95, evidences the plethora of various pleadings filed by Padnani objecting to the Chapter 9 Petition, which are either not in compliance with the Local Rules, are without merit, or both. These filings have created needless expense to the Debtor, taken up significant judicial resources, and delayed the entry of the Order for Relief. One consequence of this delay that impacts the bondholders as a group is that the United States Trustee may not proceed with appointing any committee of creditors until an Order For Relief is entered. 11 U.S.C. §1102 is applicable to Chapter 9 cases pursuant to 11 U.S.C. §901. A committee of creditors cannot be appointed until an Order for Relief is entered. See 11 U.S.C. §

1102(a)(1). Padnani's gadfly behavior, in my opinion, has created prejudice to the Debtor and its creditors, as well as to the system.

I declare under penalty and perjury under the laws of the United States that the foregoing is true and correct. Executed this 4th day of November, 2026 at Irvine, California.

/s/ Joseph P. Buchman
Jospeh P. Buchman