Docket #0003 Date Filed: 4/26/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: IMPAC MORTGAGE HOLDINGS, INC. Debtor. Tax I.D. No. 33-0675505	Chapter 11 Case No. 26-10593
In re: COPPERFIELD FINANCIAL, LLC Debtor. Tax I.D. No. 92-2127513	Chapter 11 Case No. 26-10591
In re: COPPERFIELD CAPITAL CORPORATION Debtor. Tax I.D. No. 85-0654920	Chapter 11 Case No. 26-10592
In re: IMPAC FUNDING CORPORATION Debtor. Tax I.D. No. 33-0674495	Chapter 11 Case No. 26-10594
In re: IMPAC COMMERCIAL CAPITAL CORPORATION Debtor. Tax I.D. No. 75-3070090	Chapter 11 Case No. 26-10595

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In re: IMPAC SECURED ASSETS CORP. Debtor. Tax I.D. No. 33-0715871	Chapter 11 Case No. 26-10596
In re: IMH ASSETS CORP. Debtor. Tax I.D. No. 33-0705301	Chapter 11 Case No. 26-10597
In re: INTEGRATED REAL ESTATE SERVICE CORP. Debtor. Tax I.D. No. 90-0452263	Chapter 11 Case No. 26-10598
In re: IMPAC MORTGAGE CORP. Debtor. Tax I.D. No. 80-0233937	Chapter 11 Case No. 26-10599
In re: IMPAC WAREHOUSE LENDING, INC. Debtor. Tax I.D. No. 46-5080541	Chapter 11 Case No. 26-10600
In re: SYNERGY CAPITAL MORTGAGE CORP. Debtor. Tax I.D. No. 58-2679071	Chapter 11 Case No. 26-10601

In re: IMPAC WAREHOUSE LENDING GROUP, INC. Debtor. Tax I.D. No. 33-0683488	Chapter 11 Case No. 26-10602

DEBTORS' MOTION FOR ENTRY OF AN ORDER DIRECTING JOINT ADMINISTRATION OF RELATED CHAPTER 11 CASES FOR PROCEDURAL PURPOSES ONLY

Impac Mortgage Holdings, Inc. and the above-referenced affiliated debtors and debtors in possession (collectively, the "Debtors"), in the above-captioned chapter 11 cases (the "Chapter 11 Cases"), under chapter 11 of title 11 of the United States Code, §§ 101 et seq. (the "Bankruptcy Code"),[1] hereby file this motion (the "Motion"), pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1, for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), authorizing and directing the joint administration of the Debtors' related Chapter 11 Cases for procedural purposes only. In support of the Motion, the Debtors respectfully state as follows[2]:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012. Pursuant to Local Rule 9013-1(f), the Debtors confirm their consent to the

[1] All references to "§" or "section" herein are to sections of the Bankruptcy Code. All references to "Bankruptcy Rules" are to provisions of the Federal Rules of Bankruptcy Procedure. All references to "Local Rules" are to provisions of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the *Declaration of George A. Mangiaracina in Support of Chapter 11 Petitions and First Day Pleadings* filed contemporaneously herewith (the "First Day Declaration").

entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue of the Chapter 11 Cases and related proceedings is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief requested herein are § 105(a), Bankruptcy Rule 1015(b), and Local Rule 1015-1.

BACKGROUND

4. On the date hereof (the "Petition Date"), the Debtors each commenced a voluntary case for relief under chapter 11 of the Bankruptcy Code. The Debtors are authorized to continue operating their businesses and managing their properties as debtors in possession pursuant to §§ 1107(a) and 1108.

5. No trustee, examiner, or statutory committee has been appointed in the Chapter 11 Cases.

6. Additional information regarding the Debtors, including their business and the events leading to the commencement of the Chapter 11 Cases, is set forth in the First Day Declaration filed concurrently herewith.

RELIEF REQUESTED

7. By this Motion, the Debtors seek entry of an order directing the joint administration of the Chapter 11 Cases and the consolidation thereof for procedural purposes only. The Debtors also request that the caption of the Chapter 11 Cases be modified to reflect their joint administration as follows:

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
IMPAC MORTGAGE HOLDINGS, INC., *et al.*,[1]	Case No. 26-10593
	(Jointly Administered)
Debtors.	

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Impac Mortgage Holdings, Inc. (5505); Copperfield Financial, LLC (7513); Copperfield Capital Corporation (4920); Impac Funding Corporation (4495); Impac Commercial Capital Corporation (0090); Impac Secured Assets Corp. (5871); IMH Assets Corp. (5301); Integrated Real Estate Service Corp. (2263); Impac Mortgage Corp. (3937); Impac Warehouse Lending, Inc. (0541); Synergy Capital Mortgage Corp. (9071); and Impac Warehouse Lending Group, Inc. (3488). The Debtors' mailing address is 19800 MacArthur Blvd., Suite 500, Irvine, CA 92612.

8. In addition, the Debtors request that the Court direct the Clerk of this Court (the "Clerk") to make a notation substantially similar to the following on the docket of each Debtor:

> An order (the "Joint Administration Order") has been entered in this case directing the joint administration of the chapter 11 cases listed below for procedural purposes only. The docket in Case No. 26-10593 (___) should be consulted for all matters affecting this case. The following chapter 11 cases are jointly administered pursuant to the Joint Administration Order: Impac Mortgage Holdings, Inc.; Copperfield Financial, LLC; Copperfield Capital Corporation; Impac Funding Corporation; Impac Commercial Capital Corporation; Impac Secured Assets Corp.; IMH Assets Corp.; Integrated Real Estate Service Corp.; Impac Mortgage Corp.; Impac Warehouse Lending, Inc.; Synergy Capital Mortgage Corp.; and Impac Warehouse Lending Group, Inc.

9. Finally, the Debtors request that the Court permit use of a combined service list and correspondingly combined notices.

BASIS FOR RELIEF

10. Bankruptcy Rule 1015(b) provides, in relevant part, that "[t]he court may order joint administration of the estates . . . in two or more cases pending in the court if they are brought by or against . . . a debtor and an affiliate." Fed. R. Bankr. P. 1015(b). The Debtors are "affiliates"

of each other as that term is defined in § 101(2), as Impac Mortgage Holdings, Inc. is the 100% direct or indirect owner and ultimate parent of each of the Debtors. Thus, joint administration for procedural purposes is proper.

11. Local Rule 1015-1 provides additional authority for the Court to order joint administration of these Chapter 11 Cases:

> The Court may order joint administration of related cases pending in this Court without notice and an opportunity for hearing on a motion supported by an affidavit, declaration, or verification establishing that joint administration of the cases is warranted and will ease the administrative burden for the Court and the parties. A joint administration order entered under this Local Rule (i) is procedural only and does not substantively consolidate the debtors' estates and (ii) may be reconsidered on motion of a party in interest at any time.

Del. Bankr. L.R. 1015-1.

12. Joint administration of the Chapter 11 Cases is warranted because it will ease the administrative burden on the Court and all parties in interest. Joint administration also will eliminate the need for duplicate pleadings, notices, and orders on each of the respective dockets and will save the Court, the Debtors, and other parties in interest substantial time and expense when preparing and filing such documents. Further, joint administration will protect parties in interest by ensuring that they will be apprised of the various motions filed with the Court with respect to each of the Debtors' cases. Therefore, joint administration of the Debtors' cases is appropriate under Bankruptcy Rule 1015(b) and Local Rule 1015-1.

13. Joint administration will not adversely affect the Debtors' respective constituencies because this Motion seeks only administrative, not substantive, consolidation of the Debtors' estates. Parties in interest will not be harmed by the relief requested; instead, parties in interest will benefit from the cost reductions associated with the joint administration of the Chapter 11

Cases. Accordingly, the Debtors submit that the joint administration of the Chapter 11 Cases is in the best interests of their estates, their creditors, and all other parties in interest.

14. Finally, the Debtors submit that use of the simplified caption, without reference to the Debtors' full tax identification numbers and previous names will eliminate cumbersome and confusing procedures and ensure uniformity of pleading identification.

15. For these reasons, the Debtors submit that the relief requested herein is in the best interests of the Debtors, their estates, creditors, and other parties in interest, and, therefore, should be granted.

NOTICE

16. . The Debtors will provide notice of this Motion to the following parties or their respective counsel, as applicable: (a) the U.S. Trustee; (b) the DIP Lender (c) the Prepetition Lender (d) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (e) the United States Attorney for the District of Delaware; (f) the Internal Revenue Service; (g) the state attorneys general for states in which the Debtors conduct business; (h) the Securities Exchange Commission; and (i) any party that is entitled to notice pursuant to Bankruptcy Rule 2002 (collectively, the "Notice Parties"). As this Motion is seeking "first day" relief, the Debtors will serve copies of this Motion and any order entered in respect to this Motion as required by Local Rule 9013-1(m). In light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as the Court deems just and proper.

Dated: April 26, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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Proposed Counsel for Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: IMPAC MORTGAGE HOLDINGS, INC. Debtor. Tax I.D. No. 33-0675505	Chapter 11 Case No. 26-10593
In re: COPPERFIELD FINANCIAL, LLC Debtor. Tax I.D. No. 92-2127513	Chapter 11 Case No. 26-10591
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In re: IMPAC FUNDING CORPORATION Debtor. Tax I.D. No. 33-0674495	Chapter 11 Case No. 26-10594
In re: IMPAC COMMERCIAL CAPITAL CORPORATION Debtor. Tax I.D. No. 75-3070090	Chapter 11 Case No. 26-10595

In re: IMPAC SECURED ASSETS CORP. Debtor. Tax I.D. No. 33-0715871	Chapter 11 Case No. 26-10596
In re: IMH ASSETS CORP. Debtor. Tax I.D. No. 33-0705301	Chapter 11 Case No. 26-10597
In re: INTEGRATED REAL ESTATE SERVICE CORP. Debtor. Tax I.D. No. 90-0452263	Chapter 11 Case No. 26-10598
In re: IMPAC MORTGAGE CORP. Debtor. Tax I.D. No. 80-0233937	Chapter 11 Case No. 26-10599
In re: IMPAC WAREHOUSE LENDING, INC. Debtor. Tax I.D. No. 46-5080541	Chapter 11 Case No. 26-10600
In re: SYNERGY CAPITAL MORTGAGE CORP. Debtor. Tax I.D. No. 58-2679071	Chapter 11 Case No. 26-10601

In re: IMPAC WAREHOUSE LENDING GROUP, INC. Debtor. Tax I.D. No. 33-0683488	Chapter 11 Case No. 26-10602

ORDER AUTHORIZING JOINT ADMINISTRATION OF RELATED CHAPTER 11 CASES FOR PROCEDURAL PURPOSES ONLY

Upon consideration of the motion (the "Motion")[1] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") seeking entry of an order (this "Order") pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1, authorizing and directing the joint administration of the Debtors' related chapter 11 cases for procedural purposes only; all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having reviewed the Motion and all of the pleadings related thereto; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and the Court finding that: (a) the Debtors are "affiliates" within the meaning of section 101(2) of the Bankruptcy Code, and (b) the joint administration of the Debtors' cases for procedural purposes is appropriate pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1;

[1] Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion.

and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth herein.

2. The above-captioned chapter 11 cases are hereby consolidated for procedural purposes only and shall be jointly administered by this Court. Nothing contained in this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of the above-captioned cases, and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases or of any party to oppose such relief.

3. The caption of the jointly administered cases shall read as follows:

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
IMPAC MORTGAGE HOLDINGS, INC., *et al.*,[1]	Case No. 26-10593
Debtors.	(Jointly Administered)

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Impac Mortgage Holdings, Inc. (5505); Copperfield Financial, LLC (7513); Copperfield Capital Corporation (4920); Impac Funding Corporation (4495); Impac Commercial Capital Corporation (0090); Impac Secured Assets Corp. (5871); IMH Assets Corp. (5301); Integrated Real Estate Service Corp. (2263); Impac Mortgage Corp. (3937); Impac Warehouse Lending, Inc. (0541); Synergy Capital Mortgage Corp. (9071); and Impac Warehouse Lending Group, Inc. (3488). The Debtors' mailing address is 19800 MacArthur Blvd., Suite 500, Irvine, CA 92612.

4. The Clerk is directed to make a notation substantially similar to the following on the docket of each Debtor:

> An order (the "Joint Administration Order") has been entered in this case directing the joint administration of the chapter 11 cases listed below for procedural purposes only. The docket in Case No. 26-10593 (___) should be consulted for all matters affecting this case.

> The following chapter 11 cases are jointly administered pursuant to the Joint Administration Order: Impac Mortgage Holdings, Inc.; Copperfield Financial, LLC; Copperfield Capital Corporation; Impac Funding Corporation; Impac Commercial Capital Corporation; Impac Secured Assets Corp.; IMH Assets Corp.; Integrated Real Estate Service Corp.; Impac Mortgage Corp.; Impac Warehouse Lending, Inc.; Synergy Capital Mortgage Corp.; and Impac Warehouse Lending Group, Inc.

5. The caption set forth above shall be deemed to satisfy any applicable requirements of section 342(c) of the Bankruptcy Code and Bankruptcy Rule 2002(n).

6. All pleadings and other documents to be filed in the jointly administered cases shall be filed and docketed in the case of Impac Mortgage Holdings, Inc. *et al.*, Case No. 26-10593 (___).

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. This Order shall take effect immediately upon entry.

9. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.