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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

In re: Pacific Capital Funding Group Inc., Debtor.	Case No. 26-30538-WJL Chapter 11
In re: Pacific Private Money Group LLC Debtor.	Case No. 26-30535-WJL Chapter 11
In re: Private Money Management Group LLC Debtor.	Case No. 26-30544-WJL Chapter 11
In re: Private Mortgage Capital, LLC Debtor.	Case No. 26-30539-WJL Chapter 11
In re: Pacific Note Fund Management Group LLC Debtor.	Case No. 26-30540-WJL Chapter 11
In re: Pacific Private Money, Inc. Debtor.	Case No. 26-30533-WJL Chapter 11

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In re: Pacific Private Money Partners LLC Debtor.	Case No. 26-30536-WJL Chapter 11
In re: Arrival Home Loans LLC Debtor.	Case No. 26-30543-WJL Chapter 11
In re: Pacific Private Money Fund 1 LLC Debtor.	Case No. 26-30534-WJL Chapter 11
In re: Pacific Southwest Note Fund LLC Debtor.	Case No. 26-30541-WJL Chapter 11
In re: Pacific Freedom Fund LLC Debtor.	Case No. 26-30532-WJL Chapter 11
In re: Pacific Opportunity Fund LLC Debtor.	Case No. 26-30537-WJL Chapter 11
In re: Arrival Fund I, LLC Debtor.	Case No. 26-30542-WJL Chapter 11

MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) DIRECTING THE JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES AND (II) GRANTING CERTAIN RELATED RELIEF

Hearing Date: June 26, 2026
Time: 8:00 a.m.
Place: Courtroom 220
Judge: Hon. William J. Lafferty

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Pacific Capital Funding Group, Inc., Pacific Private Money, Inc., Private Money Management Group LLC, Pacific Southwest Note Fund LLC, Pacific Private Money Partners LLC, Pacific Private Money Group LLC, Pacific Private Money Fund LLC, Pacific Opportunity Fund LLC, Pacific Note Fund Management Group LLC, Pacific Freedom Fund LLC, Pacific Mortgage Capital LLC, Arrival Home Loans, LLC, and Arrival Fund I, LLC, the debtors and debtors-in-possession (collectively the "**Debtors**"), by and through their undersigned counsel, in the above-captioned chapter 11 cases (the "**Chapter 11 Cases**"), move (the "**Motion**") this Court pursuant to sections 105(a) and 342(c)(1) of title 11 of the United States Code (the "**Bankruptcy Code**"), and Rules 1005, 1015(b), and 2002(n) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") for entry of an order substantially in the form attached hereto as **Exhibit A**, directing the joint administration of the Chapter 11 Cases and the consolidation thereof for procedural purposes only, and granting certain related relief.

The facts and circumstances supporting this Motion are set forth in the *Declaration of William R. Brinkman in support of Chapter 11 Petitions and First Day Motions* (the "Brinkman Declaration"), filed contemporaneously, and incorporated by reference.

MEMORANDUM OF POINTS AND AUTHORITIES

I. JURISDICTION AND VENUE

This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the *Order Referring Bankruptcy Code and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the Bankruptcy Local Rules. This is a core proceeding pursuant to 28 U.S.C. §157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

II. BACKGROUND

A. General Background

On May 26, 2026 (the "**Petition Date**"), PCFG, and the other Debtors, filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or official committee of unsecured creditors has been appointed in any case of the Debtors.

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B. PCFG

PCFG is a private lending company that originates and services loans secured by real estate. PCFG was incorporated in California on April 28, 2020. PCFG directly or indirectly controls or manages the 11 other Debtors.

As of the Petition Date, William R. Brinkman ("**Mr. Brinkman**") has been appointed the Chief Restructuring Offer of the Debtors. Since Mr. Brinkman's engagement on December 18, 2025, he has worked closely with the Debtors in their efforts to preserve and maintain their assets and to maximize the value thereof for all stakeholders.

III. REQUESTED RELIEF

The Debtors are affiliates of each other, and PCFG is the parent entity of the other Debtors. The organization chart attached as Exhibit 1 to the Brinkman Declaration describes the ownership and corporate structure of the Debtors.

Through this Motion, the Debtors seek entry of an order, in substantially the form attached as **Exhibit A**, directing the joint administration of the Chapter 11 Cases for procedural purposes only. The Debtors respectfully request the Court maintain one file and one docket for the Chapter 11 Cases under the case of PCFG, and that the Chapter 11 Cases be administered under the following consolidated caption (the "**Proposed Caption**"):

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

In re:	Lead Case No. 26-30538_____
Pacific Capital Funding Group Inc.,	Jointly Administered
Debtor.	Chapter 11

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The Debtors also request that a docket entry be entered on the docket in each of the Chapter 11 Cases other than PCFG, substantially as follows, to reflect the joint administration of these Chapter 11 Cases:

> An order has been entered in this case in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of Pacific Capital Funding Group Inc. and its affiliate debtors. All further pleadings and other papers shall be filed in, and all further docket entries shall be made in, the docket of Pacific Capital Funding Group Inc., Case No. 26-30538 and such docket should be consulted for all matters affecting this chapter 11 case.

IV. AUTHORITY FOR RELIEF REQUESTED

Bankruptcy Rule 1015(b) provides, in relevant part, that "[i]f a joint petition or two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates." Fed. R. Bankr. P. 1015(b).

The Debtors are "affiliates," as that term is defined in section 101(2) of the Bankruptcy Code. 11 U.S.C. § 101(2) (definitions of affiliates including an "entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor . . ."). Pursuant to Bankruptcy Code 1015(b), this Court is authorized to grant the relief requested. An order of joint administration relates to the routine administration of a case and may be entered by the Court in its sole discretion on an *ex parte* basis.

The joint administration of the Chapter 11 Cases will have several benefits, including (a) permitting the Clerk of the Court to utilize a single general docket for these Chapter 11 Cases and combine notices to creditors of the Debtors' respective estates and other parties in interest; (b) avoiding the need for duplicative notices, motions and applications, thereby saving the Debtors' estates time and expense; (c) enabling parties in interest to have a single point of reference for all matters relevant to these Chapter 11 Cases; (d) significantly reducing the volume of pleadings that otherwise would be filed with the Clerk of this Court; (e) rendering the completion of various administrative tasks less costly; and (f) minimizing the number of unnecessary delays associated with the administration of 12 separate cases.

Additionally, because this is ***not*** a motion for the substantive consolidation of the Debtors'

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estates, the rights of parties in interest will not be prejudiced or otherwise affected in any way by the entry of an order directing the joint administration of the Chapter 11 Cases for procedural purposes only.

For the reasons set forth above, the Debtors respectfully submit that the relief requested is in the best interest of the Debtors, their estates, creditors, and other parties in interest, and, therefore, should be granted.

V. NOTICE

Notice of this Motion is being provided to: (i) the U.S. Trustee; (ii) the Securities and Exchange Commission; (iii) the California Department of Financial Protection and Innovation; and (iv) all parties on the Debtors' consolidated list of 30 largest unsecured creditors. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, and such other and further relief as the Court may deem just and appropriate.

DATED: June 22, 2026

JEFFER MANGELS & MITCHELL LLP

By: */s/ Bennett G. Young*
BENNETT G. YOUNG
CHRISTOPHER K. WHANG
Proposed Attorneys for Debtors and Debtors-in-Possession

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EXHIBIT A

JEFFER MANGELS & MITCHELL LLP
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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

In re: Pacific Capital Funding Group Inc., Debtor.	Case No. 26-30538 -WJL Chapter 11
In re: Pacific Private Money Group LLC Debtor.	Case No. 26-30535 -WJL Chapter 11
In re: Private Money Management Group LLC Debtor.	Case No. 26-30544 -WJL Chapter 11
In re: Private Mortgage Capital, LLC Debtor.	Case No. 26-30539 -WJL Chapter 11
In re: Pacific Note Fund Management Group LLC Debtor.	Case No. 26-30540 -WJL Chapter 11
In re: Pacific Private Money, Inc. Debtor.	Case No. 26-30533 -WJL Chapter 11

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In re: Pacific Private Money Partners LLC Debtor.	Case No. 26-30536 -WJL Chapter 11
In re: Arrival Home Loans LLC Debtor.	Case No. 26-30543 -WJL Chapter 11
In re: Pacific Private Money Fund 1 LLC Debtor.	Case No. 26-30534 -WJL Chapter 11
In re: Pacific Southwest Note Fund LLC Debtor.	Case No. 26-30541 -WJL Chapter 11
In re: Pacific Freedom Fund LLC Debtor.	Case No. 26-30532 -WJL Chapter 11
In re: Pacific Opportunity Fund LLC Debtor.	Case No. 26-30537 -WJL Chapter 11
In re: Arrival Fund I, LLC Debtor.	Case No. 26-30542 -WJL Chapter 11

[PROPOSED] ORDER (I) DIRECTING THE JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES AND (II) GRANTING CERTAIN RELATED RELIEF

Hearing Date: June 26, 2026
Time: 8:00 a.m.
Place: Courtroom 220
Judge: Hon. William J. Lafferty

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Upon the *Motion of Debtors for Entry of an Order (I) Directing the Joint Administration of the Debtors' Chapter 11 Cases and (II) Granting Certain Related Relief* (the "Motion"), filed by the Debtors; and on consideration of the Brinkman Declaration, the statements of counsel and the evidence adduced with respect to the Motion; and this Court having found that (i) the Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal. Feb. 22, 2016), and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California; (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; (iii) this is a core proceeding pursuant to 28 U.S.C. §157(b); and (iv) notice of this Motion was sufficient under the circumstances; and this Court, after due deliberation, having found and determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, and their creditors and good and sufficient cause having been shown;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein;

2. The above-captioned Chapter 11 Cases shall be and hereby are consolidated for procedural purposes only and shall be administrated jointly. The Clerk of the Court shall maintain one file and one docket for all of the Chapter 11 Cases, which file and docket shall be the file and docket for the Debtor Pacific Capital Funding Group Inc(the "Main Case"), Case No. 26-30538

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

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

In re:	Lead Case No. 26-30538_____
Pacific Capital Funding Group Inc.,	Jointly Administered
Debtor.	Chapter 11

4. All pleadings and notices shall be captioned as indicated in the preceding paragraph,

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and all original docket entries shall be made in the case of Pacific Capital Funding Group Inc., in Case No. 26-30538. The consolidated caption satisfies the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n) in all respects.

5. An entry shall be made on the dockets of each of the Chapter 11 Cases, other than the docket maintained for the Chapter 11 Case of Pacific Capital Funding Group Inc., as follows:

> An order has been entered in this case in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of Pacific Capital Funding Group Inc. and its affiliate debtors. All further pleadings and other papers shall be filed in, and all further docket entries shall be made in, the docket of Pacific Capital Funding Group Inc., Case No. 26-30538, and such docket should be consulted for all matters affecting this chapter 11 case.

6. The terms of this Order are immediately effective and enforceable upon its entry.

7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

END OF ORDER

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