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Proposed Attorneys for Debtors and Debtors-in-Possession

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

MOTION OF DEBTORS FOR ENTRY OF AN ORDER EXTENDING TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS

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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 EXTENDING TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS

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**"), hereby move this Court ("**Motion**") pursuant to sections 105(a) and 521(a) of title 11 of the United States Code ("**Bankruptcy Code**") and Rule 1007(c) of the Federal Rules of Bankruptcy Procedure ("**Bankruptcy Rules**") for entry of an order extending the initial 14-day period to file their schedules of assets and liabilities, statements of financial affairs, and lists of equity security holders (collectively, the "**Schedules and Statements**") by 31 days, to allow the Debtors a total of 45 days after the Petition Date (as defined below) to file their Schedules and Statements ("**Schedules and Statements Deadline**"), without prejudice to the Debtors' right to request additional time if necessary. A proposed form of order granting the relief requested herein is annexed hereto as Exhibit A ("**Proposed Order**").

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 ("**Brinkman Declaration**"), filed contemporaneously herewith and incorporated by reference herein. Capitalized terms used but not defined herein have the meanings given to them in the Brinkman Declaration.

MEMORANDUM OF POINTS AND AUTHORITIES

JURISDICTION AND VENUE

This 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.), 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.

BACKGROUND

On the date hereof ("**Petition Date**"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned chapter 11 cases. The

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Debtors have also filed a motion requesting joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b). The Debtors are operating as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases and no official committees have been appointed or designated.

The Debtors owned and operated a series of subsidiaries which, in turn, managed investment funds ("**Funds**"). They engaged in the business of originating and servicing "hard money" mortgage loans. The Debtors raised capital from private investors and lent those funds to developers and other parties with those loans secured by liens against real estate. In the aggregate, the Debtors' Funds had approximately 400 individual investors holding approximately 450 accounts, with total invested capital of approximately $140 million.

RELIEF REQUESTED

The Debtors request entry of an order extending the Schedules and Statements Deadline by 31 days, to July 31. 2026, granting the Debtors a total of 45 days after the Petition Date to file their Schedules and Statements, without prejudice to the Debtors' right to request additional time if necessary. The requested extension will allow the Debtors and their limited remaining staff time to prepare the Schedules and Statements properly given the 13 Debtors, the approximately 400 investors, the complexity of the intercompany obligations, and the extremely limited staff available.

CAUSE EXISTS TO EXTEND TIME TO FILE SCHEDULES AND STATEMENTS

Section 521 of the Bankruptcy Code requires a debtor to file its schedules and statements of financial affairs unless the Court orders otherwise. 11 U.S.C. § 521(a)(1)(A)–(B). The Schedules and Statements must be filed within fourteen (14) days after the petition date unless the Bankruptcy Court grants an extension of time "on motion for cause shown." Fed. R. Bankr. P. 1007(c). Additionally, section 105(a) of the Bankruptcy Code, which codifies the equitable powers of the Bankruptcy Court, authorizes the Court to "issue any order, process or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). Similar relief has been granted in the Northern District of California in a number of cases, including *In re the Roman Catholic Bishop of Santa Rosa*, 23-10113 (CN), Dkt. No. 45 (Bankr. N.D. Cal. 2023); *In re Trinitas*

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Advantaged Agriculture Partners IV, LP, et al., 24-50210 (DM), Dkt. No. 39 (Bankr. N.D. Cal. 2024); and *In re Shift Technologies, Inc. et al.*, 23-30687 (HLB), Dkt. No. 24 (Bankr. N.D. Cal. 2023). In light of the facts and circumstances set forth herein, this Court has and should exercise its authority, consistent with sections 105(a) and 521(a) of the Bankruptcy Code, to grant the requested relief.

Collecting the necessary information to prepare the Schedules and Statements requires an enormous expenditure of time and effort on the part of the Debtors, their CRO, and their professionals. The Court's grant of a time extension to file the Schedules and Statements as requested in this Motion is appropriate in light of the following circumstances.

First, pursuant to the Brinkman Declaration, on or about February 4, 2026, the Debtors terminated all employees, and a limited number of employees were re-hired as consultants, working part-time. Therefore, while the Debtors have mobilized these part-time employees to work diligently and expeditiously to assist in the preparation of the Schedules and Statements, the 14 -day deadline is not achievable under these circumstances.

The Chapter 11 Cases involve 13 separate Debtors, each with distinct assets, properties, liabilities, contracts, leases, records, and creditor or investor relationships. Preparing accurate schedules and statements therefore requires an entity-by-entity review to determine which assets and liabilities belong to each estate. Because joint administration does not consolidate separate debtor estates, a brief extension is necessary to ensure accurate, estate-specific disclosures and avoid later corrections or confusion among creditors, investors, the U.S. Trustee, and the Court.

The Debtors also require additional time because approximately 400 investors may hold claims, equity interests, or other rights requiring proper classification and notice. Preparing the related disclosures requires verifying each investor's identity, address, investment amount, applicable debtor entity, and relationship to the estate. A brief extension will promote orderly administration by allowing the Debtors to file accurate and useful disclosures for the Court, the U.S. Trustee, investors, creditors, and other parties in interest.

Again, the 14-day deadline is not achievable under the circumstances of these Chapter 11 Cases. As a practical matter, the Debtors are unable to properly and accurately complete the

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Schedules and Statements within the initial statutory period. The number of Debtors, the complexity of the Debtors' businesses, coupled with the extremely limited staff available to the Debtors, necessitate an extension of the Schedules and Statements Deadline. Accordingly, the Debtors submit that ample cause exists to extend the time for filing the Schedules and Statements as requested in this Motion.

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; (iv) all parties on the Debtors' consolidated list of 30 largest unsecured creditors; and (v) all parties entitled to notice pursuant to the Bankruptcy Rules and the Local Rules. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

No prior request for the relief sought in this Motion has been made to this or any other court.

CONCLUSION

WHEREFORE, the Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as is just and proper.

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

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UNITED STATES BANKRUPTCY COURT

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In re: Pacific Capital Funding Group Inc., Debtor.	Case No. 26-30538 -WJL Chapter 11
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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
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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 EXTENDING TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS

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

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On consideration of the *Motion of Debtors for Entry of An Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs* (the "**Motion**"), filed by the above-captioned debtors and debtors in possession (the "**Debtors**"); the Court having reviewed the Motion and the Declaration of William R. Brinkman in Support of Chapter 11 Petitions and First Day Pleadings (the "**First Day Declaration**"), and having considered the statements of counsel and the evidence adduced with respect to the Motion at a hearing before the Court (the "Hearing"); and the Court having found that (i) the Court has jurisdiction to consider the Motion and the relief requested pursuant to 28 U.S.C. §§ 157 and 1334, and the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 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 the Motion and Hearing was sufficient under the circumstances; and after due deliberation the Court having 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.

2. The time by which the Debtors shall file their (a) Schedules of Assets and Liabilities, (b) Statements of Financial Affairs, and (c) List of Equity Security Holders is extended to July 31, 2026, without prejudice to the Debtors' right to seek further extensions upon showing of cause therefor.

3. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

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

** END OF ORDER **

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