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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re: Pacific Capital Funding Group Inc., Debtor In re: Pacific Capital Funding Group Inc. Pacific Private Money Group LLC Private Money Management Group LLC Pacific Mortgage Capital, LLC Pacific Note Fund Management Group LLC Pacific Private Money, Inc. Pacific Private Money Partners LLC Arrival Home Loans LLC Pacific Private Money Fund 1 LLC Pacific Southwest Note Fund LLC Pacific Freedom Fund LLC Pacific Opportunity Fund LLC Arrival Fund I, LLC Affects: ☐ Pacific Capital Funding Group Inc. ☐ Pacific Private Money Group LLC ☐ Private Money Management Group LLC ☐ Pacific Mortgage Capital, LLC ☐ Pacific Note Fund Management Group LLC	Case No. 26-30538 (WJL) Chapter 11 Jointly Administered with: Case No. 26-30538 (WJL) Case No. 26-30535 (WJL) Case No. 26-30544 (WJL) Case No. 26-30539 (WJL) Case No. 26-30540 (WJL) Case No. 26-30533 (WJL) Case No. 26-30536 (WJL) Case No. 26-30543 (WJL) Case No. 26-30534 (WJL) Case No. 26-30541 (WJL) Case No. 26-30532 (WJL) Case No. 26-30537 (WJL) Case No. 26-30542 (WJL) ***EX PARTE* APPLICATION FOR ORDER AUTHORIZING RULE 2004 EXAMINATION OF BANKS**

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☐ Pacific Private Money, Inc.
☐ Pacific Private Money Partners LLC
☐ Arrival Home Loans LLC
☐ Pacific Private Money Fund 1 LLC
☐ Pacific Southwest Note Fund LLC
☐ Pacific Freedom Fund LLC
☐ Pacific Opportunity Fund LLC
☐ Arrival Fund I, LLC
☒ All Debtors

I. RELIEF REQUESTED

The Official Committee of Unsecured Creditors for the above Debtors (the "Committee") hereby applies to the Court, pursuant to Federal Rule of Bankruptcy Procedure 2004 ("Rule 2004") and N.D. Cal. Bankruptcy Local Rule 2004-1(a), for the following order permitting the Committee to serve subpoenas for the production of documents upon the following third-party entities: (a) Wells Fargo Bank, N.A. ("WF"), with proposed categories for production attached as **Exhibit A**; (b) Poppy Bank ("PB"), with proposed categories for production attached as **Exhibit B**; (c) City Bank ("CB"), with proposed categories for production attached as **Exhibit C**; and (d) First Capital Bank of Texas known now as Prosperity Bank ("FCB"), with proposed categories for production attached as **Exhibit D**. WF, PB, CB, and FCB shall be referred to as the "Banks".

II. FACTUAL BACKGROUND

On June 16, 2026, the above-captioned Debtors filed their voluntary petitions under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). Doc. #1. On July 2, 2026, this Court directed that the Debtors' cases were to be jointly administered for purely administrative purposes. Doc. #33. On July 8, 2026, the United States Trustee appointed the Committee. Doc. #39. On July 15, 2026, the Committee selected Fox Rothschild LLP as its counsel. On September 3, 2026, the Court approved Fox Rothschild's employment as Committee counsel. Doc. #133.

The Court previously issued an order authorizing a 2004 examination of WF and PB. Doc. # 147. Since that time, the Committee's forensic accountant has identified additional relevant accounts with those two banks and has identified additional relevant accounts with other banks as detailed

herein.

III. APPLICABLE LAW

Rule 2004 provides in pertinent part as follows:

> (a) Examination on Motion. On motion of any party in interest, the court may order the examination of any entity.
>
> (b) Scope of Examination. The examination of an entity under this rule or of the debtor under § 343 of the Code may relate only to the acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor's estate, or to the debtor's right to a discharge . . . .
>
> (c) Compelling Attendance and Production of Documents. The attendance of an entity for examination and for the production of documents, whether the examination is to be conducted within or without the district in which the case is pending, may be compelled as provided in Rule 9016 for the attendance of a witness at a hearing or trial. As an officer of the court, an attorney may issue and sign a subpoena on behalf of the court for the district in which the examination is to be held if the attorney is admitted to practice in that court or in the court in which the case is pending.
>
> (d) Time and Place of Examination of Debtor. The court may for cause shown and on terms as it may impose order the debtor to be examined under this rule at any time or place it designates, whether within or without the district wherein the case is pending.

Bankruptcy Local Rule 2004-1(a) provides that the Clerk may issue an order granting a 2004 application ex parte and without notice:

> (a) Issuance of Order.
>
> The Clerk may issue on behalf of the Court, ex parte and without notice, orders granting applications for examination of an entity pursuant to Bankruptcy Rule 2004(a).

IV. BASIS FOR REQUEST FOR RULE 2004 EXAMINATION

Examinations under Rule 2004 may properly investigate "acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor's estate[.]" Rule 2004(b). "[T]he scope of a 2004 examination is 'unfettered and broad' and is akin to a fishing expedition. [Citation.]" *In re Subpoena Duces Tecum*, 461 B.R. 823, 829 (Bankr. C.D. Cal. 2011).

For each of the Banks identified herein, examination is warranted because the information sought consists of the Debtors' financial records. The Debtors held bank accounts with the Banks.

The Committee seeks to subpoena the Banks for the production of records relating to the Debtors. The Committee desires these records in order to investigate the Debtors' acts, conduct, property, and financial condition. Furthermore, the Committee needs these records for its forensic investigation of the Debtors which will inform the administration of the case as it relates to among other things, any proposed plan. The Banks also have financial information of affiliates of the Debtors and insiders of the Debtors. The Committee seeks these records to evaluate their connections to the Debtors.

The proposed categories for production of documents to each of the Banks are attached as Exhibit A through Exhibit D.

V. MEET AND CONFER

Since a Rule 2004 examination is issued on an ex parte basis, the Committee will meet and confer with any entity that will be examined over the documents sought, be it before or after a subpoena is issued.

The Committee notes that the failure of an entity to object to the issuance of the Rule 2004 Order does not constitute a waiver of any objection to the examination. The Committee further notes that pursuant to Local Rule 2004-1(b), any dispute regarding a Rule 2004 Order is treated as a discovery dispute.

VI. CONCLUSION

WHEREFORE, the Committee respectfully requests that an Order for Rule 2004 Examination be entered permitting the Committee to serve subpoenas for production of documents provided for in **Exhibit A through Exhibit D**. A copy of the Proposed Order granting this Application is attached hereto as **Exhibit E** and a copy will be uploaded concurrently with the filing of this application.

Dated: October 14, 2026.

FOX ROTHSCHILD LLP

By */s/ Jack Praetzellis*
Michael A. Sweet
Jack Praetzellis
Noah Thomas
Attorneys for the Official Committee
of Unsecured Creditors

Exhibit A
(Wells Fargo Bank, N.A.)

CATEGORIES FOR PRODUCTION BY WELLS FARGO BANK, N.A.
INSTRUCTIONS

A. **Time Period**: Unless otherwise noted below, this request covers the seven-year period from July 1, 2019 through June 30, 2026 (the "REQUEST PERIOD") for each account identified in SCHEDULE A.

B. **Availability of Older Records**: To the extent records for any account are not available for the full REQUEST PERIOD due to the bank's record retention policy or for any other reason (including, for example, that the account was opened after the beginning of the REQUEST PERIOD), please (a) produce all responsive records that are available for the REQUEST PERIOD, and (b) identify in writing the earliest date for which records exist for that account and the reason records are not available for the full REQUEST PERIOD, including any applicable retention policy or other limitation.

C. **Format**: Please produce records in electronic format, organized by account number and by month, rather than as a single undifferentiated file. For each account, please provide both (a) PDF copies of the records as maintained by the bank, and (b) the underlying structured/transaction-level data (e.g., CSV or Excel export) for that account, to the extent the bank's systems can generate it. Structured data should be provided in addition to, not in lieu of, the PDF records.

D. **Scope of Accounts**: If the bank's records reflect any additional accounts held in the name of, or associated with, the entities or account numbers listed in SCHEDULE A that are not separately listed (including any predecessor, successor, or renumbered accounts), please include those accounts and notify the requesting party of their existence.

E. To the extent full records are not available for the REQUEST PERIOD, produce all records that do exist for each account and provide a written statement identifying: (a) the earliest date for which records are available for that account, and (b) the basis for any limitation (e.g., standard record retention schedule, account closure, systems conversion, etc.). This instruction shall not narrow the scope of the request below.

F. You are instructed to produce the DOCUMENTS that are in your possession, custody or control, including, but not limited to, DOCUMENTS in the possession of your attorneys,

accountants, bookkeepers, agents, and/or representatives. You are further instructed to produce the DOCUMENTS as they are kept in the usual course of business. In addition, DOCUMENTS are to be produced in their entirety; redacted DOCUMENTS will not constitute compliance with this request.

G. If you assert a privilege, work product immunity, or decline to provide an answer on the basis of some other objection, you must provide a privilege log in which you include sufficient facts for the court to make a full determination of whether the claim or objection is valid, including:

i. identify and describe the DOCUMENT(S) or COMMUNICATION(S) in question, including its title, its general subject matter, its date, and its author;

ii. describe the basis for the asserted privilege or objection;

iii. identify every person to whom the document was sent, or every person present when the communication was made; and

iv. identify the present custodian of the document, if any.

H. If any part of a DOCUMENT is responsive to any category herein, the entire DOCUMENT should be produced.

DEFINITIONS

I. The term SCHEDULE A shall mean the following account(s) at Wells Fargo Bank, N.A:

Entity Name	EIN last 4 digits	Bank Account Number last 4 digits[1]
Arrival Home Loans LLC	5185	8108
PACIFIC ALPHA ONE FUNDING, LLC	6166	6877
Pacific Freedom Fund LLC	3239	8452
Pacific Freedom Fund LLC	3239	6515
Pacific Freedom Fund LLC	3239	8429
Pacific Opportunity Fund LLC	9296	3029
Pacific Private Money Fund I, LLC	1895	6267
Pacific Private Money Fund I, LLC	1895	5091
Pacific Private Money Inc	4932	6637
Pacific Private Money Inc	4932	1183
Pacific Private Money Inc	4932	0282
Pacific Private Money Inc	4932	1191

[1] Complete EIN and account numbers can be made available through a request to counsel issuing the subpoena.

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Pacific Private Money Partners LLC	3821	1566
Pacific Southwest Note Fund LLC	6297	1582
Pacific Southwest Note Fund LLC	6297	1590
Hanf Capital LLC	6858	2717
Hanf Capital LLC	6858	4655
Pacific Realty Development	2378	2380

J. The term SCHEDULE A shall ***also include*** any other bank account in the name of any of the following entities:

1. Pacific Capital Funding Group, Inc.
2. Pacific Private Money Group, LLC
3. Private Money Management Group, LLC
4. Pacific Mortgage Capital, LLC
5. Pacific Note Fund Management Group, LLC
6. Pacific Private Money, Inc.
7. Pacific Private Money Partners, LLC
8. Arrival Home Loans, LLC
9. Pacific Private Money Fund 1, LLC
10. Pacific Southwest Note Fund, LLC
11. Pacific Freedom Fund, LLC
12. Pacific Opportunity Fund, LLC
13. Arrival Fund I, LLC
14. Pacific South West Management Group, LLC
15. North Star Capital Group, LLC
16. North Star Capital Fund, LLC
17. Pacific Opportunity REIT
18. Pacific Opportunity REIT I
19. Pacific Realty Development, LLC
20. Pacific Realty Development I, LLC
21. Hanf Capital LLC
22. Ark Technology Holdings II, LLC
23. PPMX, Inc.
24. Quantum Bay Holdings, LLC
25. Pacific Algo Technologies, Inc.
26. Pacific SPE1, LLC
27. Pacific SPE2, LLC
28. Powell Street Partners, LLC
29. Pacific Alpha One, LLC
30. PMC Fund One, LLC
31. Pacific Lending Partners, LLC
32. PPSPE-1, LLC
33. AHL 2, Inc.
34. Mark Hanf
35. The Pacific Trust (Mark Sanchez as Trustee)

K. The term REQUEST PERIOD shall mean from July 1, 2019 through June 30, 2026.

L. The terms DOCUMENT and DOCUMENTS shall mean and is synonymous with the term "documents or electronically stored information" in Federal Rule of Civil Procedure 34(a)(1)(A).

A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS. The term DOCUMENT or DOCUMENTS includes electronically stored information.

M. The terms COMMUNICATION and COMMUNICATIONS shall mean the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

CATEGORIES FOR PRODUCTION

1. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce complete monthly account statements, including all pages (front and back) as issued by the bank in the ordinary course of business.

2. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all canceled checks (front and back images) drawn on each account, including any items that cannot be located as canceled checks but are reflected as check images in the bank's imaging system.

3. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all deposit items, including deposit slips and images of all checks, money orders, or other instruments deposited into each account.

4. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to incoming and outgoing wire transfers for each account, including wire transfer request forms, originator and beneficiary names, originator and beneficiary account numbers, originating and receiving bank names and routing numbers, wire confirmations, and any memo or reference field associated with each wire.

5. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to ACH transactions (both debits and credits) for each account, including originator/company name, originator ID, and any available counterparty account and routing information.

6. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to debit card, ATM, or point-of-sale transactions on each account, if applicable.

7. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all signature cards, account opening documentation (including account applications, resolutions, and beneficial ownership/authorized signer forms), and any DOCUMENTS reflecting additions, removals, or other changes to account signatories, authorized signers, or persons with authority over the account.

8. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS identifying all persons or entities with signatory authority, ownership interest, or online banking access to each account during the REQUEST PERIOD, including records reflecting any additions, removals, or changes to such authority, ownership interest, or access during the REQUEST PERIOD.

9. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS of any linked, sweep, or related accounts associated with any account listed in SCHEDULE A.

10. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all online banking and bill-pay transaction detail, to the extent maintained separately from monthly statements.

11. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS reflecting any account analysis statements, fee schedules, or service charge reports reflecting activity on each account.

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Exhibit B
(Poppy Bank)

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CATEGORIES FOR PRODUCTION BY POPPY BANK

INSTRUCTIONS

A. **Time Period**: Unless otherwise noted below, this request covers the seven-year period from July 1, 2019 through June 30, 2026 (the "REQUEST PERIOD") for each account identified in SCHEDULE A.

B. **Availability of Older Records**: To the extent records for any account are not available for the full REQUEST PERIOD due to the bank's record retention policy or for any other reason (including, for example, that the account was opened after the beginning of the REQUEST PERIOD), please (a) produce all responsive records that are available for the REQUEST PERIOD, and (b) identify in writing the earliest date for which records exist for that account and the reason records are not available for the full REQUEST PERIOD, including any applicable retention policy or other limitation.

C. **Format**: Please produce records in electronic format, organized by account number and by month, rather than as a single undifferentiated file. For each account, please provide both (a) PDF copies of the records as maintained by the bank, and (b) the underlying structured/transaction-level data (e.g., CSV or Excel export) for that account, to the extent the bank's systems can generate it. Structured data should be provided in addition to, not in lieu of, the PDF records.

D. **Scope of Accounts**: If the bank's records reflect any additional accounts held in the name of, or associated with, the entities or account numbers listed in SCHEDULE A that are not separately listed (including any predecessor, successor, or renumbered accounts), please include those accounts and notify the requesting party of their existence.

E. To the extent full records are not available for the REQUEST PERIOD, produce all records that do exist for each account and provide a written statement identifying: (a) the earliest date for which records are available for that account, and (b) the basis for any limitation (e.g., standard record retention schedule, account closure, systems conversion, etc.). This instruction shall not narrow the scope of the request below.

F. You are instructed to produce the DOCUMENTS that are in your possession, custody or control, including, but not limited to, DOCUMENTS in the possession of your attorneys,

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accountants, bookkeepers, agents, and/or representatives. You are further instructed to produce the DOCUMENTS as they are kept in the usual course of business. In addition, DOCUMENTS are to be produced in their entirety; redacted DOCUMENTS will not constitute compliance with this request.

G. If you assert a privilege, work product immunity, or decline to provide an answer on the basis of some other objection, you must provide a privilege log in which you include sufficient facts for the court to make a full determination of whether the claim or objection is valid, including:

i. identify and describe the DOCUMENT(S) or COMMUNICATION(S) in question, including its title, its general subject matter, its date, and its author;

ii. describe the basis for the asserted privilege or objection;

iii. identify every person to whom the document was sent, or every person present when the communication was made; and

iv. identify the present custodian of the document, if any.

H. If any part of a DOCUMENT is responsive to any category herein, the entire DOCUMENT should be produced.

DEFINITIONS

I. The term SCHEDULE A shall mean the following 2 account(s) at Poppy Bank:

Entity Name	EIN last 4 digits	Account Number last 4 digits[2]
Pacific Private Money Inc	4932	1975
Pacific Private Money Inc	4932	2188

J. The term SCHEDULE A shall ***also include*** any other bank account in the name of any of the following entities:

1. Pacific Capital Funding Group, Inc.
2. Pacific Private Money Group, LLC
3. Private Money Management Group, LLC
4. Pacific Mortgage Capital, LLC
5. Pacific Note Fund Management Group, LLC
6. Pacific Private Money, Inc.

[2] Complete EIN and account numbers can be made available through a request to counsel issuing the subpoena.

7. Pacific Private Money Partners, LLC
8. Arrival Home Loans, LLC
9. Pacific Private Money Fund 1, LLC
10. Pacific Southwest Note Fund, LLC
11. Pacific Freedom Fund, LLC
12. Pacific Opportunity Fund, LLC
13. Arrival Fund I, LLC
14. Pacific South West Management Group, LLC
15. North Star Capital Group, LLC
16. North Star Capital Fund, LLC
17. Pacific Opportunity REIT
18. Pacific Opportunity REIT I
19. Pacific Realty Development, LLC
20. Pacific Realty Development I, LLC
21. Hanf Capital LLC
22. Ark Technology Holdings II, LLC
23. PPMX, Inc.
24. Quantum Bay Holdings, LLC
25. Pacific Algo Technologies, Inc.
26. Pacific SPE1, LLC
27. Pacific SPE2, LLC
28. Powell Street Partners, LLC
29. Pacific Alpha One, LLC
30. PMC Fund One, LLC
31. Pacific Lending Partners, LLC
32. PPSPE-1, LLC
33. AHL 2, Inc.
34. Mark Hanf
35. The Pacific Trust (Mark Sanchez as Trustee)

K. The term REQUEST PERIOD shall mean from July 1, 2019 through June 30, 2026.

L. The terms DOCUMENT and DOCUMENTS shall mean and is synonymous with the term "documents or electronically stored information" in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS. The term DOCUMENT or DOCUMENTS includes electronically stored information.

M. The terms COMMUNICATION and COMMUNICATIONS shall mean the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

CATEGORIES FOR PRODUCTION

1. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce complete monthly account statements, including all pages (front and back) as issued by the bank in the ordinary course of business.

2. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all canceled checks (front and back images) drawn on each account, including any items that cannot be located as canceled checks but are reflected as check images in the bank's imaging system.

3. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all deposit items, including deposit slips and images of all checks, money orders, or other instruments deposited into each account.

4. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to incoming and outgoing wire transfers for each account, including wire transfer request forms, originator and beneficiary names, originator and beneficiary account numbers, originating and receiving bank names and routing numbers, wire confirmations, and any memo or reference field associated with each wire.

5. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to ACH transactions (both debits and credits) for each account, including originator/company name, originator ID, and any available counterparty account and routing information.

6. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to debit card, ATM, or point-of-sale transactions on each account, if applicable.

7. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all signature cards, account opening documentation (including account applications, resolutions, and beneficial ownership/authorized signer forms), and any DOCUMENTS reflecting additions, removals, or other changes to account signatories, authorized signers, or persons with authority over the account.

8. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS identifying all persons or entities with signatory authority, ownership interest, or online banking access to each account during the REQUEST PERIOD, including records reflecting any additions, removals, or changes to such authority, ownership interest, or access during the REQUEST PERIOD.

9. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS of any linked, sweep, or related accounts associated with any account listed in SCHEDULE A.

10. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all online banking and bill-pay transaction detail, to the extent maintained separately from monthly statements.

11. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS reflecting any account analysis statements, fee schedules, or service charge reports reflecting activity on each account.

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Exhibit C
(City Bank)

CATEGORIES FOR PRODUCTION BY CITY BANK OF TEXAS

INSTRUCTIONS

A. **Time Period**: Unless otherwise noted below, this request covers the seven-year period from July 1, 2019 through June 30, 2026 (the "REQUEST PERIOD") for each account identified in SCHEDULE A.

B. **Availability of Older Records**: To the extent records for any account are not available for the full REQUEST PERIOD due to the bank's record retention policy or for any other reason (including, for example, that the account was opened after the beginning of the REQUEST PERIOD), please (a) produce all responsive records that are available for the REQUEST PERIOD, and (b) identify in writing the earliest date for which records exist for that account and the reason records are not available for the full REQUEST PERIOD, including any applicable retention policy or other limitation.

C. **Format**: Please produce records in electronic format, organized by account number and by month, rather than as a single undifferentiated file. For each account, please provide both (a) PDF copies of the records as maintained by the bank, and (b) the underlying structured/transaction-level data (e.g., CSV or Excel export) for that account, to the extent the bank's systems can generate it. Structured data should be provided in addition to, not in lieu of, the PDF records.

D. **Scope of Accounts**: If the bank's records reflect any additional accounts held in the name of, or associated with, the entities or account numbers listed in SCHEDULE A that are not separately listed (including any predecessor, successor, or renumbered accounts), please include those accounts and notify the requesting party of their existence.

E. To the extent full records are not available for the REQUEST PERIOD, produce all records that do exist for each account and provide a written statement identifying: (a) the earliest date for which records are available for that account, and (b) the basis for any limitation (e.g., standard record retention schedule, account closure, systems conversion, etc.). This instruction shall not narrow the scope of the request below.

F. You are instructed to produce the DOCUMENTS that are in your possession, custody or control, including, but not limited to, DOCUMENTS in the possession of your attorneys,

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accountants, bookkeepers, agents, and/or representatives. You are further instructed to produce the DOCUMENTS as they are kept in the usual course of business. In addition, DOCUMENTS are to be produced in their entirety; redacted DOCUMENTS will not constitute compliance with this request.

G. If you assert a privilege, work product immunity, or decline to provide an answer on the basis of some other objection, you must provide a privilege log in which you include sufficient facts for the court to make a full determination of whether the claim or objection is valid, including:

i. identify and describe the DOCUMENT(S) or COMMUNICATION(S) in question, including its title, its general subject matter, its date, and its author;

ii. describe the basis for the asserted privilege or objection;

iii. identify every person to whom the document was sent, or every person present when the communication was made; and

iv. identify the present custodian of the document, if any.

H. If any part of a DOCUMENT is responsive to any category herein, the entire DOCUMENT should be produced.

DEFINITIONS

I. The term SCHEDULE A shall mean the following 3 account(s) at City Bank:

Entity Name	EIN last 4 digits	Account Number last 4 digits[3]
Pacific Southwest Management Group	7809	6220
Pacific Southwest Note Fund LLC	6297	3023
Pacific Southwest Note Fund LLC	6297	3015

J. The term SCHEDULE A shall ***also include*** any other bank account in the name of any of the following entities:

1. Pacific Capital Funding Group, Inc.
2. Pacific Private Money Group, LLC
3. Private Money Management Group, LLC
4. Pacific Mortgage Capital, LLC

[3] Complete EIN and account numbers can be made available through a request to counsel issuing the subpoena.

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5. Pacific Note Fund Management Group, LLC
6. Pacific Private Money, Inc.
7. Pacific Private Money Partners, LLC
8. Arrival Home Loans, LLC
9. Pacific Private Money Fund 1, LLC
10. Pacific Southwest Note Fund, LLC
11. Pacific Freedom Fund, LLC
12. Pacific Opportunity Fund, LLC
13. Arrival Fund I, LLC
14. Pacific South West Management Group, LLC
15. North Star Capital Group, LLC
16. North Star Capital Fund, LLC
17. Pacific Opportunity REIT
18. Pacific Opportunity REIT I
19. Pacific Realty Development, LLC
20. Pacific Realty Development I, LLC
21. Hanf Capital LLC
22. Ark Technology Holdings II, LLC
23. PPMX, Inc.
24. Quantum Bay Holdings, LLC
25. Pacific Algo Technologies, Inc.
26. Pacific SPE1, LLC
27. Pacific SPE2, LLC
28. Powell Street Partners, LLC
29. Pacific Alpha One, LLC
30. PMC Fund One, LLC
31. Pacific Lending Partners, LLC
32. PPSPE-1, LLC
33. AHL 2, Inc.
34. Mark Hanf
35. The Pacific Trust (Mark Sanchez as Trustee)

K. The term REQUEST PERIOD shall mean from July 1, 2019 through June 30, 2026.

L. The terms DOCUMENT and DOCUMENTS shall mean and is synonymous with the term "documents or electronically stored information" in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS. The term DOCUMENT or DOCUMENTS includes electronically stored information.

M. The terms COMMUNICATION and COMMUNICATIONS shall mean the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

CATEGORIES FOR PRODUCTION

1. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce complete monthly account statements, including all pages (front and back) as issued by the bank in the ordinary course of business.

2. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all canceled checks (front and back images) drawn on each account, including any items that cannot be located as canceled checks but are reflected as check images in the bank's imaging system.

3. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all deposit items, including deposit slips and images of all checks, money orders, or other instruments deposited into each account.

4. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to incoming and outgoing wire transfers for each account, including wire transfer request forms, originator and beneficiary names, originator and beneficiary account numbers, originating and receiving bank names and routing numbers, wire confirmations, and any memo or reference field associated with each wire.

5. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to ACH transactions (both debits and credits) for each account, including originator/company name, originator ID, and any available counterparty account and routing information.

6. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to debit card, ATM, or point-of-sale transactions on each account, if applicable.

7. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all signature cards, account opening documentation (including account applications, resolutions, and beneficial ownership/authorized signer forms), and any DOCUMENTS reflecting additions, removals, or other changes to account signatories, authorized signers, or persons with authority over the account.

8. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS identifying all persons or entities with signatory authority, ownership interest, or online banking access to each account during the REQUEST PERIOD, including records reflecting any additions, removals, or changes to such authority, ownership interest, or access during the REQUEST PERIOD.

9. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS of any linked, sweep, or related accounts associated with any account listed in SCHEDULE A.

10. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all online banking and bill-pay transaction detail, to the extent maintained separately from monthly statements.

11. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS reflecting any account analysis statements, fee schedules, or service charge reports reflecting activity on each account.

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Exhibit D

(First Capital Bank of Texas known now as Prosperity Bank)

CATEGORIES FOR PRODUCTION BY FIRST CAPITAL BANK OF TEXAS KNOWN NOW AS PROSPERITY BANK

INSTRUCTIONS

A. **Time Period**: Unless otherwise noted below, this request covers the seven-year period from July 1, 2019 through June 30, 2026 (the "REQUEST PERIOD") for each account identified in SCHEDULE A.

B. **Availability of Older Records**: To the extent records for any account are not available for the full REQUEST PERIOD due to the bank's record retention policy or for any other reason (including, for example, that the account was opened after the beginning of the REQUEST PERIOD), please (a) produce all responsive records that are available for the REQUEST PERIOD, and (b) identify in writing the earliest date for which records exist for that account and the reason records are not available for the full REQUEST PERIOD, including any applicable retention policy or other limitation.

C. **Format**: Please produce records in electronic format, organized by account number and by month, rather than as a single undifferentiated file. For each account, please provide both (a) PDF copies of the records as maintained by the bank, and (b) the underlying structured/transaction-level data (e.g., CSV or Excel export) for that account, to the extent the bank's systems can generate it. Structured data should be provided in addition to, not in lieu of, the PDF records.

D. **Scope of Accounts**: If the bank's records reflect any additional accounts held in the name of, or associated with, the entities or account numbers listed in SCHEDULE A that are not separately listed (including any predecessor, successor, or renumbered accounts), please include those accounts and notify the requesting party of their existence.

E. To the extent full records are not available for the REQUEST PERIOD, produce all records that do exist for each account and provide a written statement identifying: (a) the earliest date for which records are available for that account, and (b) the basis for any limitation (e.g., standard record retention schedule, account closure, systems conversion, etc.). This instruction shall not narrow the scope of the request below.

F. You are instructed to produce the DOCUMENTS that are in your possession, custody or control, including, but not limited to, DOCUMENTS in the possession of your attorneys, accountants, bookkeepers, agents, and/or representatives. You are further instructed to produce the DOCUMENTS as they are kept in the usual course of business. In addition, DOCUMENTS are to be produced in their entirety; redacted DOCUMENTS will not constitute compliance with this request.

G. If you assert a privilege, work product immunity, or decline to provide an answer on the basis of some other objection, you must provide a privilege log in which you include sufficient facts for the court to make a full determination of whether the claim or objection is valid, including:

i. identify and describe the DOCUMENT(S) or COMMUNICATION(S) in question, including its title, its general subject matter, its date, and its author;

ii. describe the basis for the asserted privilege or objection;

iii. identify every person to whom the document was sent, or every person present when the communication was made; and

iv. identify the present custodian of the document, if any.

H. If any part of a DOCUMENT is responsive to any category herEIN last 4 digits, the entire DOCUMENT should be produced.

DEFINITIONS

I. The term SCHEDULE A shall mean the following 3 account(s) at First Capital Bank of Texas:

Entity Name	EIN last 4 digits	Account Number last 4 digits[4]
Pacific Southwest Note Fund LLC	6297	1705
Pacific Southwest Note Fund LLC	6297	1762
Pacific Southwest Note Fund LLC	6297	1713

[4] Complete EIN and account numbers can be made available through a request to counsel issuing the subpoena.

J. The term SCHEDULE A shall ***also include*** any other bank account in the name of any of the following entities:

1. Pacific Capital Funding Group, Inc.
2. Pacific Private Money Group, LLC
3. Private Money Management Group, LLC
4. Pacific Mortgage Capital, LLC
5. Pacific Note Fund Management Group, LLC
6. Pacific Private Money, Inc.
7. Pacific Private Money Partners, LLC
8. Arrival Home Loans, LLC
9. Pacific Private Money Fund 1, LLC
10. Pacific Southwest Note Fund, LLC
11. Pacific Freedom Fund, LLC
12. Pacific Opportunity Fund, LLC
13. Arrival Fund I, LLC
14. Pacific South West Management Group, LLC
15. North Star Capital Group, LLC
16. North Star Capital Fund, LLC
17. Pacific Opportunity REIT
18. Pacific Opportunity REIT I
19. Pacific Realty Development, LLC
20. Pacific Realty Development I, LLC
21. Hanf Capital LLC
22. Ark Technology Holdings II, LLC
23. PPMX, Inc.
24. Quantum Bay Holdings, LLC
25. Pacific Algo Technologies, Inc.
26. Pacific SPE1, LLC
27. Pacific SPE2, LLC
28. Powell Street Partners, LLC
29. Pacific Alpha One, LLC
30. PMC Fund One, LLC
31. Pacific Lending Partners, LLC
32. PPSPE-1, LLC
33. AHL 2, Inc.
34. Mark Hanf
35. The Pacific Trust (Mark Sanchez as Trustee)

K. The term REQUEST PERIOD shall mean from July 1, 2019 through June 30, 2026.

L. The terms DOCUMENT and DOCUMENTS shall mean and is synonymous with the term "documents or electronically stored information" in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS. The term DOCUMENT or DOCUMENTS includes electronically stored information.

M. The terms COMMUNICATION and COMMUNICATIONS shall mean the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

CATEGORIES FOR PRODUCTION

1. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce complete monthly account statements, including all pages (front and back) as issued by the bank in the ordinary course of business.

2. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all canceled checks (front and back images) drawn on each account, including any items that cannot be located as canceled checks but are reflected as check images in the bank's imaging system.

3. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all deposit items, including deposit slips and images of all checks, money orders, or other instruments deposited into each account.

4. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to incoming and outgoing wire transfers for each account, including wire transfer request forms, originator and beneficiary names, originator and beneficiary account numbers, originating and receiving bank names and routing numbers, wire confirmations, and any memo or reference field associated with each wire.

5. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to ACH transactions (both debits and credits) for each account, including originator/company name, originator ID, and any available counterparty account and routing information.

6. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS relating to debit card, ATM, or point-of-sale transactions on each account, if applicable.

7. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all signature cards, account opening documentation (including account applications, resolutions, and beneficial ownership/authorized signer forms), and any DOCUMENTS reflecting additions, removals, or other changes to account signatories, authorized signers, or persons with authority over the account.

8. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS identifying all persons or entities with signatory authority, ownership interest, or

online banking access to each account during the REQUEST PERIOD, including records reflecting any additions, removals, or changes to such authority, ownership interest, or access during the REQUEST PERIOD.

9. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS of any linked, sweep, or related accounts associated with any account listed in SCHEDULE A.

10. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all online banking and bill-pay transaction detail, to the extent maintained separately from monthly statements.

11. For each account listed in SCHEDULE A for the REQUEST PERIOD, produce all DOCUMENTS reflecting any account analysis statements, fee schedules, or service charge reports reflecting activity on each account.

Exhibit E
(Proposed Order)

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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re: Pacific Capital Funding Group Inc., Debtor In re: Pacific Capital Funding Group Inc. Pacific Private Money Group LLC Private Money Management Group LLC Pacific Mortgage Capital, LLC Pacific Note Fund Management Group LLC Pacific Private Money, Inc. Pacific Private Money Partners LLC Arrival Home Loans LLC Pacific Private Money Fund 1 LLC Pacific Southwest Note Fund LLC Pacific Freedom Fund LLC Pacific Opportunity Fund LLC Arrival Fund I, LLC Affects: ☐ Pacific Capital Funding Group Inc. ☐ Pacific Private Money Group LLC ☐ Private Money Management Group LLC ☐ Pacific Mortgage Capital, LLC	Case No. 26-30538 Chapter 11 Jointly Administered with: Case No. 26-30538 (WJL) Case No. 26-30535 (WJL) Case No. 26-30544 (WJL) Case No. 26-30539 (WJL) Case No. 26-30540 (WJL) Case No. 26-30533 (WJL) Case No. 26-30536 (WJL) Case No. 26-30543 (WJL) Case No. 26-30534 (WJL) Case No. 26-30541 (WJL) Case No. 26-30532 (WJL) Case No. 26-30537 (WJL) Case No. 26-30542 (WJL) **ORDER GRANTING *EX PARTE* APPLICATION FOR ORDER AUTHORIZING RULE 2004 EXAMINATION OF BANKS**

☐ Pacific Note Fund Management Group LLC

☐ Pacific Private Money, Inc.

☐ Pacific Private Money Partners LLC

☐ Arrival Home Loans LLC

☐ Pacific Private Money Fund 1 LLC

☐ Pacific Southwest Note Fund LLC

☐ Pacific Freedom Fund LLC

☐ Pacific Opportunity Fund LLC

☐ Arrival Fund I, LLC

☒ All Debtors

The Application ("**Application**") [Doc.# __] of the Official Committee of Unsecured Creditors (the "**Committee**") of the Estates of the above-captioned debtors (the "**Debtors**") pursuant to Bankruptcy Rule 2004 for an examination of Wells Fargo Bank, N.A., Poppy Bank, City Bank, and First Capital Bank of Texas is **GRANTED**. Accordingly, it is hereby **ORDERED** that:

1. The Committee may serve a subpoena for the production of documents on Wells Fargo Bank, N.A. with categories for production attached as **Exhibit A** to the Application; and

2. The Committee may serve a subpoena for the production of documents on Poppy Bank with categories for production attached as **Exhibit B** to the Application.

3. The Committee may serve a subpoena for the production of documents on City Bank with categories for production attached as **Exhibit C** to the Application.

4. The Committee may serve a subpoena for the production of documents on First Capital Bank of Texas (k/n/a Prosperity Bank) with categories for production attached as **Exhibit D** to the Application.

END OF ORDER

Court Service List

All parties on ECF.

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