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*Proposed Counsel to the Debtor and  
Debtor-in-Possession*

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

In re:

CashCall, Inc.,

Debtor.

Case No. 26-03102-JBM11

Chapter 11

**DEBTOR'S *FIRST DAY* MOTION FOR AN  
ORDER EXTENDING TIME TO FILE  
SCHEDULES OF ASSETS AND  
LIABILITIES AND STATEMENTS OF  
FINANCIAL AFFAIRS**

[Declarations of Leslie Gladstone and J. Paul  
Reddam in Support of Chapter 11 Petition and First  
Day Pleadings Filed Concurrently]

Date:

Time:

Place: Courtroom

Name of Judge: Judge J. Barrett Marum

1 **TO HONORABLE MARUM, UNITED STATES BANKRUPTCY JUDGE, THE OFFICE**  
 2 **OF THE UNITED STATES TRUSTEE, ALL CREDITORS, PARTIES REQUESTING SPECIAL**  
 3 **NOTICE:**

4 1. By this Motion (this “**Motion**”), the above-captioned debtor (the “**Debtor**”), as debtor and  
 5 debtor-in-possession herein, requests the entry of an order, substantially in the form attached hereto as  
 6 Exhibit A (the “**Proposed Order**”), extending the deadline by which the Debtor must file its Schedules  
 7 of Assets and Liabilities and Statement of Financial Affairs (“**Schedules and Statement**”) required  
 8 pursuant to section 521 of title 11 of the United States Code (the “**Bankruptcy Code**”), and Rule 1007 of  
 9 the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”). In support of this Motion, the  
 10 Debtor states as follows:

11 **I. JURISDICTION AND VENUE**

12 2. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This  
 13 is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and  
 14 1409.

15 3. The statutory basis for the relief requested in the Motion are sections 105(a) and 521 of the  
 16 Bankruptcy Code, Bankruptcy Rules 1007 and 9006, and the Southern District of California Local  
 17 Bankruptcy Rule 1007-4.

18 **II. BACKGROUND**

19 4. On July 20, 2026 (the “**Petition Date**”), the Debtor filed its voluntary petition for relief  
 20 under chapter 11 of the Bankruptcy Code commencing the above-captioned case (the “**Chapter 11**  
 21 **Case**”). The Debtor continues to manage and operate its business as debtor-in-possession pursuant to  
 22 Bankruptcy Code §§ 1107 and 1108. An official committee of unsecured creditors has yet to be appointed  
 23 in this Chapter 11 Case. Further, no trustee or examiner has been requested or appointed.

24 5. A detailed description of the Debtor and its business, the facts and circumstances leading  
 25 up to the filing of the Debtor’s Chapter 11 Case, and the facts supporting this Motion are set forth in  
 26 greater detail in the *Declaration of Leslie Gladstone in Support of the Debtor’s Chapter 11 Petition and*  
 27 *First Day Pleadings* (the “**Gladstone Declaration**”) and *Declaration of J. Paul Reddam in Support of the*  
 28

1 *Debtor's Chapter 11 Petition and First Day Pleadings* (the “**Reddam Declaration**”), which are being  
2 filed concurrently herewith and are incorporated by reference in this Motion.

3 **III. RELIEF REQUESTED**

4 6. Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c) require a debtor to file  
5 schedules of assets and liabilities and a statement of financial affairs within fourteen (14) days from the  
6 date of filing its petition (the “**Initial Deadline**”).

7 7. By this Motion, the Debtor seeks an extension of 30 days from the Initial Deadline to file  
8 the Schedules and Statements, through and including August 19, 2026, without prejudice to the Debtor's  
9 rights to request additional time.

10 **IV. BASIS FOR RELIEF REQUESTED**

11 8. Although the Debtor has commenced the process of gathering the necessary information  
12 to prepare and finalize its Schedules and Statements, the fourteen-day period provided by Bankruptcy  
13 Rule 1007(c), will be insufficient for the Debtor to complete its Schedules and Statements.

14 9. Pursuant to Bankruptcy Rules 1007(a)(5), 1007(c) and 9006(b), an extension of time to file  
15 the Schedules and Statements may be granted “for cause.” While the Bankruptcy Rules do not define or  
16 delineate the parameters necessary to establish cause, courts have held that “cause” is a liberal standard,  
17 and extensions of time to file schedules and statements of financial affairs should be granted in the absence  
18 of prejudice or bad faith. *See Bryant v. Smith*, 165 B.R. 176, 181-82 (W.D. Va. 1994).

19 10. The nature of the Debtor's current business affairs, its limited availability to perform the  
20 required internal review of its financial and other records (the Debtor has no remaining employees), the  
21 matters that the Debtor must address in the early days of this Chapter 11 Case, and the pressure incident  
22 to the commencement of the Chapter 11 Case provide ample cause justifying the extension of the Debtor's  
23 deadline to file its Schedules and Statements.

24 11. The additional time requested by the Debtor to prepare and file its Schedules and  
25 Statements will help the Debtor smoothly transition into chapter 11, and ultimately maximize the value of  
26 its estate for the benefit of creditors and all parties-in-interest. Consequently, it is in the best interests of  
27 the Debtor and its creditors that the Debtor be granted the extension of time to file its Schedules and  
28 Statements. Therefore, the Debtor submits that cause exists to extend the deadline for the Debtor to file

its Schedules and Statements, without prejudice to the Debtor's right to seek a further extension of the deadline from this Court.

12. Courts in this jurisdiction and others routinely grant similar relief. *See, e.g., In re Roman Catholic Bishop of San Diego*, Case No. 24-02202 (Bankr. S.D. Cal. June 27, 2024) (Dkt. 38); *In re GOL Linhas Aéreas Inteligentes S.A.*, Case No. 24-10118 (MG) (Bankr. S.D.N.Y. January 29, 2024) (Dkt. No. 67) (granting an additional 59 days to file schedules and statements); *In re Benitago, Inc.*, Case No. 23-11394 (SHL) (Bankr. S.D.N.Y. October 20, 2023) (Dkt. No. 100) (granting total of additional 44 days to file schedules and statements); *In re Avaya Inc.*, Case No. 17-10089 (SMB) (Bankr. S.D.N.Y. Feb. 10, 2017) (Dkt. No. 143) (granting an additional 47 days to file schedules and statements).

13. Pursuant to Local Rules 1007-4 and 9034-1(a)(1), prior to this filing, the Debtor requested a statement of position from the United States Trustee regarding this Motion by emailing the U.S. Trustee's Office this Motion, the supporting Gladstone and Reddam Declarations, and the Proposed Order attached hereto.

#### **V. NOTICE**

14. Notice of this Motion has been provided to: (i) the Office of the United States Trustee; (ii) the Debtor's secured creditors (there are none); (iii) any party whose interests are directly affected by this specific pleading; (iv) those persons who have formally appeared and requested notice and service in these proceedings pursuant to Bankruptcy Rules 2002 and 3017; (v) counsel for the proposed DIP Lender; (vi) the list of 20 largest unsecured creditors of the Debtor; and (vii) all governmental agencies having a regulatory or statutory interest in these cases. No other further notice need be provided.

#### **VI. NO PREVIOUS REQUEST**

15. No previous request for the relief sought herein has been made by the Debtor to this or any other court.

#### **VII. CONCLUSION**

WHEREFORE, the Debtor respectfully requests that the Court enter the proposed order, substantially in the form attached hereto, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

1 Dated: July 20, 2026

MANATT, PHELPS & PHILLIPS, LLP

2  
3 By: /s/ Patrick L. DuBois

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14 *Proposed Counsel to the Debtor and Debtor-in-*  
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# EXHIBIT A

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**UNITED STATES BANKRUPTCY COURT**

SOUTHERN DISTRICT OF CALIFORNIA  
325 West F Street, San Diego, California 92101-6991

In Re CashCall, Inc.

Debtor.

BANKRUPTCY NO. 26-03102-JBM11

Date of Hearing:

Time of Hearing:

Name of Judge: Judge J. Barrett Marum

**ORDER ON**

**DEBTOR'S FIRST DAY MOTION FOR AN ORDER EXTENDING TIME TO FILE SCHEDULES OF ASSETS  
AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS**

The court orders as set forth on the continuation pages attached and numbered 2 through 2 with exhibits, if any, for a total of 3 pages. Motion/Application Docket Entry No. \_\_\_\_.

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DATED:

\_\_\_\_\_  
Judge, United States Bankruptcy Court

CSD 1001A [07/01/18]

Page 2 of 2

ORDER ON  
DEBTOR:

CASE NO: 26-03102-JBM11

The Court, having considered the First Day Motion for an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs (the "Motion for Extension of Deadline") filed by CashCall, Inc. ("Debtor"), the Chapter 11 debtor and debtor in possession in the above-captioned Chapter 11 bankruptcy case, and the Court having found that it has jurisdiction to consider the Motion for Extension of Deadline and the relief requested therein, and upon consideration of the Declarations in Support of First Day Motions submitted by the Debtor, and finding good cause to grant the Motion for Extension of Deadline,

## HEREBY ORDERS:

1. The Motion for Extension of Deadline is GRANTED as set forth herein.
2. The Debtor is granted an extension of time through and including August 19, 2026 to file its Schedules and Statements, without prejudice to the Debtor's right to seek a further extension of this time period by the filing of a motion on appropriate notice.
3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

\*\*\*END OF ORDER\*\*\*