THOMAS J. NOLAN (State Bar No. 66992)
Thomas.Nolan@skadden.com
CAROLINE VAN NESS (State Bar No. 281675)
Caroline.VanNess@skadden.com
KASONNI M. SCALES (State Bar No. 301871)
Kasonni.Scales@skadden.com
JULIA M. NAHIGIAN (State Bar No. 307508)
Julia.Nahigian@skadden.com
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
300 South Grand Avenue, Suite 3400
Los Angeles, California 90071-3144
Telephone: (213) 687-5000
Facsimile: (213) 687-5600

JOSEPH L. BARLOON (Admitted *Pro Hac Vice*)
Joseph.Barloon@skadden.com
AUSTIN K. BROWN (Admitted *Pro Hac Vice*)
Austin.Brown@skadden.com
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
1440 New York Avenue, N.W.
Washington, DC 20005
Telephone: (202) 371-7000
Facsimile: (202) 393-5760

Attorneys for Defendants

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, v. CASHCALL, INC., WS FUNDING, LLC, DELBERT SERVICES CORPORATION, and J. PAUL REDDAM, Defendants.	CASE NO.: 2:15-cv-07522-JFW (RAOx) DEPOSITION TESTIMONY OF J. PAUL REDDAM (JUNE 1, 2016) IN SUPPORT OF DEFENDANTS' REPLY IN SUPPORT OT THEIR MOTION SUMMARY JUDGMENT Hearing Date: August 1, 2016 Time: 1:30 p.m. Place: Courtroom 16 Judge: Hon. John F. Walter Pre-Trial Conf.: September 9, 2016 Trial: September 27, 2016

11:4 Q. Since --- since 2000, let's put it that
11:5 way.
11:6 A. I don't think I've personally prepared it,
11:7 no.
11:8 Q. Okay. Do you remember ever submitting
11:9 your resume to a state banking department for any
11:10 reason?
11:11 A. I don't remember doing so, no.
11:12 Q. All right. Do you remember -- well, let's
11:13 -- let's just go through -- what's on this
11:14 document. Looking at the first page -- well, first
11:15 of all, is that your name and either current or
11:16 former address up there?
11:17 A. Yes.
11:18 Q. Okay. Under experience, is that an
11:19 accurate, reflect your academic experience?
11:20 MR. NOLAN: So now you're referring to
11:21 what follows under category entitled "Education"?
11:22 MR. MARTIKAN: I am.
11:23 A. Okay. Yes.

27:3 Q. The next sentence says, "All of the
27:4 company's department heads report directly to
27:5 Mr. Reddam." Is that a true statement?
27:6 A. What time frame are you asking about?
27:7 Q. Is it a true statement now?
27:8 A. No.

27:9 Q. Is it a -- was it a true statement in
27:10 2009?
27:11 A. No, I don't think so, in the sense that
27:12 there were people reporting to people who reported
27:13 to me, so –

30:3 Q. Let me go to the next sentence of this
30:4 biography. It states, "He is responsible for
30:5 devising and implementing all major company
30:6 policies, including its various loan programs and
30:7 interest rates." Is that a true statement with
30:8 respect to you?
30:9 A. This is what -- what period of time?
30:10 Q. Is it true now?
30:11 A. No.
30:12 Q. Was it true in 2009?
30:13 A. The -- I would say I had an active hand in
30:14 major company policies, but I would say it's an
30:15 exaggeration to say that I devised and implemented
30:16 all -- all policies. For example, human resources
30:17 dealt with -- some combination of Del and Dan would
30:18 devise those policies.

58:14 Q. And by "regulatory risk," you mean the
58:15 risk that some federal or state regulator would
58:16 find what you were doing violated some law and try

58:17 to shut it down. Is that what you mean?
58:18 A. Or extract some penalty or something, yes.

67:13 Q. Do you know who they were purchased from?
67:14 A. WS Funding?
67:15 Q. Who WS Funding purchased the loans from?
67:16 Do you know?
67:17 A. No. I -- I have a belief, but I --
67:18 Q. Have you ever heard of a company called
67:19 Western Sky Financial?
67:20 A. Yes.
67:21 Q. Okay. And do you know if that's Butch
67:22 Webb's company?
67:23 A. Yes.
67:24 Q. Okay. So are you aware that -- whether WS
67:25 Funding entered into an assignment agreement to
68:1 purchase loans from Western Sky Financial?
68:2 A. Well --
68:3 MR. NOLAN: Same objection. Lack of
68:4 foundation. Best evidence is the documents
68:5 themselves.
68:6 You can answer the question, if you know.
68:7 A. I don't know, and because I wasn't the one
68:8 who designed the mechanics of -- of these loan
68:9 purchases. But CashCall or a subsidiary, WS
68:10 Funding, I suppose, would have purchased loans from
68:11 Western Sky, but I don't know, you know, how they

68:12 followed along the purchase timeline that way.

DATED: July 18, 2016

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: */s/ Thomas J. Nolan*
Thomas J. Nolan
Attorneys for Defendants