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Attorneys for Defendants
CashCall, Inc. and J. Paul Reddam

IN THE UNITED STATES DISTRICT COURT

FOR THE 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)

JOINT STATEMENT RE: LOCAL RULE 7-3 CONFERENCE OF COUNSEL PRIOR TO FILING OF MOTION

Assigned to Hon. John F. Walter

JOINT STATEMENT

Counsel for plaintiff Consumer Financial Protection Bureau (the "CFPB" or "Bureau") and defendants CashCall, Inc. and J. Paul Reddam (collectively, "Defendants" and, with the CFPB, the "Parties") hereby submit this joint statement regarding the Local Rule 7-3 Conference of Counsel prior to the filing of Defendants' anticipated motion for judgment on the pleadings pursuant to Federal Rule of Civil Procedure 60(b)(the "Motion").

Pursuant to Central District of California Local Rule 7-3, on June 15, 2026, the parties met and conferred by Teams videoconference regarding the relief sought by the proposed Motion. Reuben Camper Cahn represented Defendants, and Victoria Dorfman and Christina Coll represented Plaintiff. In advance of our meeting, counsel for Defendants provided counsel for Plaintiff a draft of the Motion for counsel's review. The meet and confer videoconference lasted approximately 20 minutes. The Parties thoroughly discussed the relief sought and the bases therefore as well as additional logistical concerns regarding the Motion hearing date and the availability of counsel.

The parties were unable to reach agreement on the relief requested. Plaintiff's counsel took the position that Federal Rule of Civil Procedure 60(b)(5) and its related case law do not support Defendants' Motion. Counsel for the Bureau stated that Federal Rule of Civil Procedure 60(b)(6) and its related case law also do not support Defendants' Motion.

Plaintiff's counsel further advised that because the only remaining member of the original trial team expected to be on leave from June 17 through July 6, the Bureau requested an extension of its time to reply until July 27, 2026.

On June 30, 2026, the Parties met again by Teams videoconference to further meet and confer concerning the Motion. Defendants were again represented by Reuben Camper Cahn, and the Bureau was represented by Joseph Lake and Alusheyi Wheeler. The meet and confer lasted approximately 5 minutes. Plaintiff's counsel had received the final version of the Motion and supporting declarations. Plaintiff's counsel advised that

neither the final version of the Motion nor the supporting declarations altered Plaintiff's position that Rules 60(b)(5) and 60(b)(6) and related caselaw do not support the motion.

Respectfully submitted,

Dated: June 30, 2026

BIENERT KATZMAN LITTRELL WILLIAMS LLP

By: _____
Reuben Camper Cahn

Attorneys for Defendants CashCall, Inc. and J. Paul Reddam

Dated: June 30, 2026

CONSUMER FINANCIAL PROTECTION BUREAU

By: */s/ Joseph Lake*
Joseph Lake

Attorney for Plaintiff Consumer Financial Protection Bureau

CONSENT CERTIFICATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Reuben Camper Cahn, attest that all other signatories listed above concur in this filing's content and have authorized this filing.

_____
Reuben Camper Cahn