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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 "Plaintiff") 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 post-judgment discovery in aid of Defendants' pending motion for relief from judgment pursuant to Federal Rule of Civil Procedure 60(b) (the "Motion").

Pursuant to Central District of California Local Rule 7-3, on August 6, 2026, the parties met and conferred by Teams regarding the relief sought by the proposed Motion. Reuben Camper Cahn and Olivia Lauren Weber represented Defendants, and Deborah Morris, Christina Coll and Daniel Shapiro represented Plaintiff. Mr. Cahn and Mr. Shapiro called in and the other attendees all appeared via videoconference. In advance of the Parties' meeting, counsel for Defendants provided counsel for Plaintiff a draft of the Motion for counsel's review. The meet and confer videoconference lasted approximately 10 minutes.

The Parties discussed Plaintiff's privilege, burden, and relevance objections, particularly as to categories 3 and 4 of the discovery requests to Victoria Dorfman. Defendants asked whether there were any modifications that could be made to the Motion or accompanying discovery requests that would lead to an agreement, and Plaintiff indicated that there were not. The Plaintiff stated that all of the proposed discovery requests are irrelevant to Defendants' Rule 60(b) motion, seek documents extensively, if not entirely,covered by one or more privileges or protections, and are overly burdensome,disproportionate, and unreasonable.

The Parties were unable to reach agreement on the relief requested.

Respectfully submitted,

Dated: August 10, 2026

BIENERT KATZMAN LITTRELL WILLIAMS LLP

By: _____
Reuben Camper Cahn

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

Respectfully submitted,

Dated: August 10, 2026

CONSUMER FINANCIAL PROTECTION BUREAU

By: */s/ Christina S. Coll*
Christina S. Coll

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