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9 *Attorneys for Defendants*
10 CashCall, Inc. and J. Paul Reddam

11
12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 CONSUMER FINANCIAL
15 PROTECTION BUREAU,

16 Plaintiff,

17 v.

18 CASHCALL, INC.; WS FUNDING,
19 LLC; DELBERT SERVICES
20 CORPORATION; and J. PAUL
21 REDDAM,

22 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

1
2 Counsel for plaintiff Consumer Financial Protection Bureau (the “CFPB” or
3 “Bureau”) and defendants CashCall, Inc. and J. Paul Reddam (collectively, “Defendants”
4 and, with the CFPB, the “Parties”) hereby submit this joint statement regarding the Local
5 Rule 7-3 Conference of Counsel prior to the filing of Defendants’ anticipated motion for
6 judgment on the pleadings pursuant to Federal Rule of Civil Procedure 60(b)(the
7 “Motion”).

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

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

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


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

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

3
4 Respectfully submitted,

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6 Dated: June 30, 2026

BIENERT KATZMAN
LITTRELL WILLIAMS LLP

7
8 By: 
9 Reuben Camper Cahn

10 *Attorneys for Defendants*
11 *CashCall, Inc. and J. Paul Reddam*

12
13 Dated: June 30, 2026

CONSUMER FINANCIAL PROTECTION
BUREAU

14
15 By: /s/ Joseph Lake
16 Joseph Lake

17 *Attorney for Plaintiff Consumer Financial*
18 *Protection Bureau*

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21
22
23 **CONSENT CERTIFICATION**

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

26
27 
28 Reuben Camper Cahn