

JEFFER MANGELS & MITCHELL LLP
BENNETT G. YOUNG (Bar No. 106504)
byoung@jeffer.com
CHRISTOPHER K. WHANG (Bar No. 316916)
cwhang@jeffer.com
333 Bush Street, 11th Floor
San Francisco, California 94104-2872
Telephone: (415) 398-8080
Facsimile: (415) 398-5584

Proposed Attorneys for Debtors and Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

In re:	Case No. 26-30538-WJL
Pacific Capital Funding Group Inc.,	Chapter 11
Debtor.	
In re:	Case No. 26-30535-WJL
Pacific Private Money Group LLC	Chapter 11
Debtor.	
In re:	Case No. 26-30544-WJL
Private Money Management Group LLC	Chapter 11
Debtor.	
In re:	Case No. 26-30539-WJL
Private Mortgage Capital, LLC	Chapter 11
Debtor.	
In re:	Case No. 26-30540-WJL
Pacific Note Fund Management Group LLC	Chapter 11
Debtor.	
In re:	Case No. 26-30533-WJL
Pacific Private Money, Inc.	Chapter 11
Debtor.	

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In re:
Pacific Private Money Partners LLC
Debtor.
In re:
Arrival Home Loans LLC
Debtor.
In re:
Pacific Private Money Fund 1 LLC
Debtor.
In re:
Pacific Southwest Note Fund LLC
Debtor.
In re:
Pacific Freedom Fund LLC
Debtor.
In re:
Pacific Opportunity Fund LLC
Debtor.
In re:
Arrival Fund I, LLC
Debtor.

Case No. 26-30536-WJL

Chapter 11

Case No. 26-30543-WJL

Chapter 11

Case No. 26-30534-WJL

Chapter 11

Case No. 26-30541-WJL

Chapter 11

Case No. 26-30532-WJL

Chapter 11

Case No. 26-30537-WJL

Chapter 11

Case No. 26-30542-WJL

Chapter 11

**EMERGENCY MOTION OF DEBTORS
FOR AUTHORIZATION TO FILE A
REDACTED MAILING MATRIX TO
REDACT CERTAIN PERSONAL
IDENTIFICATION INFORMATION FOR
INDIVIDUAL CREDITORS**

Hearing Date: June 26, 2026
Time: 8:00 a.m.
Place: Courtroom 220
Judge: Hon. William J. Lafferty

Pacific Capital Funding Group, Inc., Pacific Private Money, Inc., Private Money Management Group LLC, Pacific Southwest Note Fund LLC, Pacific Private Money Partners LLC, Pacific Private Money Group LLC, Pacific Private Money Fund LLC, Pacific Opportunity Fund LLC, Pacific Note Fund Management Group LLC, Pacific Freedom Fund LLC, Pacific Mortgage Capital LLC, Arrival Home Loans, LLC, and Arrival Fund I, LLC, the debtors and debtors-in-possession (collectively the "**Debtors**"), by and through their undersigned counsel, submit this motion ("**Motion**") for entry of an order, substantially in the form attached as **Exhibit A** (the "**Proposed Order**") authorizing the Debtors to file a redacted mailing matrix to redact certain personal identification information for individual creditors. In support of the Motion, the Debtors rely on and incorporate by reference the Declaration of William R. Brinkman in Support of Chapter 11 Petitions and First Day Motions (the "**First Day Declaration**"), and respectfully represent as follows:

JURISDICTION AND VENUE

The United States Bankruptcy Court for the Northern District of California (the "**Court**") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2) and may be determined by the Court.

The basis for the relief requested herein are sections 105(a), 107(c), and 521 of title 11 of the United States Code (the "**Bankruptcy Code**"), Rule 1007 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and the Local Rules for the United States Bankruptcy Court for the Northern District of California (the "**Local Rules**").

BACKGROUND

On the date hereof (the "**Petition Date**"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned chapter 11 cases. The Debtors have also filed a motion requesting joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b). The Debtors are operating as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases and no official committees have been appointed

1 or designated.

2 The Debtors owned and operated a series of subsidiaries which, in turn, manage investment
3 funds (the “**Funds**”). They engaged in the business of originating and servicing "hard money"
4 mortgage loans. The Debtors raised capital from private investors and lent those funds to developers
5 and other parties with those loans secured by liens against real estate.

6 In the aggregate, the Debtors’ Funds had approximately 500 individual investors holding
7 approximately 450 accounts, with total invested capital of approximately \$140 million.

8 **RELIEF REQUESTED**

9 The Debtors seek entry of the Proposed Order authorizing the Debtors to file a redacted
10 mailing matrix to redact certain personal identification information for individual creditors.

11 **BASIS FOR RELIEF**

12 **A. Redaction of Personal Information of Individual Creditors is Warranted.**

13 Section 107(c) of the Bankruptcy Code provides that the Court "for cause, may protect an
14 individual, with respect to the following types of information to the extent the court finds that
15 disclosure of such information would create undue risk of identity theft or other unlawful injury to
16 the individual[:].... [a]ny means of identification... contained in a paper filed, or to be filed in a case
17 under" the Bankruptcy Code. 11 U.S.C. § 107(c)(1)(A). Moreover, Section 105 of the Bankruptcy
18 Code provides that the Court "may issue any order, process, or judgment that is necessary or
19 appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).

20 The Debtors respectfully submit that cause exists to authorize the Debtors to redact address
21 information and other personally identifiable information of individual creditors from the Creditor
22 Matrix for the following reasons:

23 (i) Many of the Debtors' approximately 400 investors are individuals and many are
24 elderly, making them particularly vulnerable to exploitation and identity theft;

25 (ii) The Creditor Matrix contains the names and addresses of each investor and thus
26 contains "personally identifiable information" as defined in Bankruptcy Code section 101(41A)(i),
27 the disclosure of which could create an undue risk of identity theft or other unlawful injury to such
28 individuals; and

1 (iii) There are ongoing investigations by the U.S. Securities and Exchange Commission,
2 the U.S. Department of Justice and Federal Bureau of Investigation, and the California Department
3 of Financial Protection and Innovation into PPM's practices.

4 The Debtors propose to provide an un-redacted version of the Creditor Matrix to the Office
5 of the U.S. Trustee, any official committee appointed in these chapter 11 cases (the "**Committee**"),
6 and to the Court; provided, however, that the Debtors shall not be required to provide an un-redacted
7 version until such party signs a confidentiality agreement acceptable to the Debtors, unless
8 otherwise ordered by the Court, and the Debtors shall only provide an un-redacted version of the
9 Creditor Matrix to the Court by filing it under seal.

10 In summary, this Motion is an honest, good-faith effort to protect the Debtors' investors and
11 creditors' privacy and security, and the risk here is particularly acute given that the investors are
12 elderly individuals who may have been the victims of fraudulent practices, and are at heightened
13 risk of being targeted by other wrongdoers if their personally identifiable information is made
14 publicly available. Further, the Debtors are not seeking to redact any more information than is
15 reasonably necessary to protect the creditors' privacy and security. The Debtors can and will provide
16 an un-redacted version of the Creditor Matrix to the U.S. Trustee, the Committee, and to this Court
17 upon request as described above. Thus, the Debtors' request strikes an appropriate and reasonable
18 balance between the general preference for transparency and the need to ensure that personal
19 information is not misused.

20 NOTICE

21 Notice of this Motion is being provided to: (i) the U.S. Trustee; (ii) the Securities and
22 Exchange Commission; (iii) the California Department of Financial Protection and Innovation; and
23 (iv) all parties on the Debtors' consolidated list of 30 largest unsecured creditors. The Debtors submit
24 that, in light of the nature of the relief requested, no other or further notice need be given.

25 NO PRIOR REQUEST

26 No prior request for the relief sought in this Motion has been made to this or any other court.

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CONCLUSION

WHEREFORE, the Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as is just and proper.

DATED: June 22, 2026

JEFFER MANGELS & MITCHELL LLP

By: /s/ Bennett G. Young
BENNETT G. YOUNG
CHRISTOPHER K. WHANG
Proposed Attorneys for Debtors and Debtors-in-
Possession

EXHIBIT A

JEFFER MANGELS & MITCHELL LLP
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cwhang@jeffer.com
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Case No. 26-30532 -WJL

Chapter 11

Case No. 26-30537 -WJL

Chapter 11

Case No. 26-30542 -WJL

Chapter 11

[PROPOSED] ORDER AUTHORIZING DEBTORS TO (I) FILE A REDACTED MAILING MATRIX TO REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION FOR INDIVIDUAL CREDITORS , AND (II) GRANTING RELATED RELIEF

Hearing Date: June 26, 2026
Time: 8:00 a.m.
Place: Courtroom 220
Judge: Hon. William J. Lafferty

On consideration of the *Motion of Debtors for Authorization to (I) Redact Certain Personal Identification Information for Individual Creditors, and (II) Granting Related Relief* (the "**Motion**"), filed by the above-captioned debtors and debtors in possession (the "**Debtors**"); the Court having reviewed the Motion and the Declaration of William R. Brinkman in Support of Chapter 11 Petitions and First Day Motions (the "**First Day Declaration**"), and having considered the statements of counsel and the evidence adduced with respect to the Motion at a hearing before the Court (the "Hearing"); and the Court having found that (i) the Court has jurisdiction to consider the Motion and the relief requested pursuant to 28 U.S.C. §§ 157 and 1334, and the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California; (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and (iv) notice of the Motion and Hearing was sufficient under the circumstances; and after due deliberation the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, and their creditors; and good and sufficient cause having been shown;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted.
2. The Debtors are authorized to file a redacted mailing matrix to redact certain personal identification information for individual creditors.
3. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.
4. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

**** END OF ORDER ****