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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

SAN FERNANDO VALLEY DIVISION

In re:

RELIANT LIFE SHARES, LLC, a
California limited liability company,

Debtor and
Debtor-In-Possession.

Case No. 1:24-bk-11695-MB

Chapter 11

**AMENDED DECLARATION OF
NICHOLAS D. RUBIN IN SUPPORT
OF CONFIRMATION OF THE
SECOND AMENDED CHAPTER 11
PLAN OF LIQUIDATION**

Hearing Information:

DATE: December 17, 2025

TIME: 10:00 a.m.

PLACE: Courtroom 303

**21041 Burbank Blvd.,
Woodland Hills, CA 91367**

I, Nicholas D. Rubin, declare as follows:

1. I know each of the following facts to be true of my own personal knowledge, except as otherwise stated and, if called as a witness, I could and would competently testify with respect thereto. I make this declaration in support of confirmation of the *Second Amended Chapter 11 Plan of Liquidation* proposed by Reliant Life Shares, LLC, the debtor and debtor-in-possession (the "Debtor"). I am the Debtor's chief restructuring officer and have served in that capacity since October 5, 2024.

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2 2. I am a principal of Force Ten Partners, LLC, a firm that has extensive
3 experience in providing CRO services and serving as a financial advisor to debtors,
4 creditors, trustees, official creditors' committees, and others in a wide variety of bankruptcy
5 matters, including acting as the CRO, independent director, or financial advisor in the
6 bankruptcy proceedings of Rubio's Coastal Grill, BurgerFi International, Litigation Practice
7 Group, Corner Bakery, Tuesday Morning Corporation, Thomas Health System, Inc.,
8 Watsonville Hospital Corporation, Alpha Guardian, Trade Global/Jagged Peak, Sugarfina,
9 Inc., and Carbonlite Holdings LLC.

10 3. I have approximately 20 years of experience providing financial advisory,
11 restructuring and turnaround services and have advised companies across a diverse range of
12 industries. I have assisted clients both inside and outside of chapter 11 in addressing a
13 variety of financial, accounting, operational, liquidity, and leverage issues. I served as the
14 CRO in recent bankruptcy cases, such as Contour Propco 1735 S. Mission LLC, Pacific
15 Mortgage Exchange, Alpha Guardian, and MRRC Hold Co. I have served as financial
16 advisor in both in and out-of-court restructurings.

17 **FORMULATION OF THE DEBTOR'S PLAN**

18 4. Immediately prior to this chapter 11 bankruptcy case, the Debtor was in an
19 equity receivership with Christopher Conway appointed as the receiver (the "Receiver")
20 with full control over its assets and operations. The Los Angeles Superior Court appointed
21 the Receiver at the request of Daniel Cooper and Richard Cooper, Trustee, as judgment
22 creditors of the Debtor. The Receiver is considered an expert in the life settlement industry.
23 At the time of my retention, the Receiver had been at the helm for over a year and had a
24 broad understanding of the issues plaguing the Debtor and ways that they might be
25 ameliorated.

26 5. The Receiver's focus had been on stabilizing the portfolio of life settlement
27 policies that were held in the Reliant Life Shares Series Statutory Trust (the "Original
28 Trust") because after his appointment, he discovered that a number of policies had already

1 lapsed for non-payment of premiums and there were no funds on hand with which to pay
2 premiums coming due on the remaining policies. To fill these gaps, the State Court
3 authorized the sale of several policies and the Receiver re-started the billing process.

4 6. Upon my appointment, I continued the Receiver's efforts to stabilize the
5 Debtor's business and the portfolio of life settlement policies while formulating a long-term
6 exit strategy for this bankruptcy case. I obtained Court approval to retain ISC Services, a
7 company that the Receiver is a principal of, to continue with the billing and to also obtain
8 medical updates in order to assist us with valuation of the policies. In February 2025, the
9 Debtor invoiced its investors for insurance premiums due through March 31, 2025. We
10 have continued billing on a quarterly basis since then and have used that process not only
11 for the obvious purpose of ensuring that there were sufficient funds with which to pay
12 premiums, but also to identify how many of the investors wished to maintain their
13 investments and remain active. As of September 29, 2025, approximately 442 clients had
14 elected to maintain their death benefits, which total approximately \$53.8 million.

15 7. After the Office of the United States Trustee appointed an official committee
16 of unsecured creditors (the "Committee") and the Committee retained counsel, I also
17 consulted with Committee counsel to get creditor input on the path forward. Both the
18 Committee and the Debtor have hosted town halls in both large formats and in smaller
19 group sessions in order to provide a forum for investors to get questions answered.

20 8. When the Receiver was appointed, the Debtor's business model and trust
21 structure involved multiple separate series trusts, each of which were sub-trusts of the main
22 trust, the Reliant Life Shares Series Statutory Trust. All of the sub-trusts under the main
23 statutory trust were separate and distinct from one another, such that each sub-trust held
24 only one life insurance policy. Individual investors purchased fractional interest positions
25 as beneficiaries—not as owners, trustees or control persons—in a given sub-trust.

26 9. Because of the resignation of Bank of Utah as the trustee of the Original
27 Trust and in order to make it clear that the Receiver had the authority to act as grantor under
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1 the trust, the Receiver formed The Reliant Life Shares Receivership Statutory Trust with
2 Odyssey Transfer and Trust Company as trustee. That trust did not formally have the sub-
3 trust structure, although pending approval of the pooling concept discussed below, it has
4 been managed as if that structure still existed.

5 10. Upon my appointment, I had an open mind about the path forward and while
6 I considered the Receiver's proposal to pool the life settlement policies into one trust with
7 investors holding death benefits across the portfolio of policies, I also considered other
8 alternatives and structures. After a considerable amount of analysis and after consulting
9 with the Debtor's counsel and Committee counsel, I determined that the concept of pooling
10 the life settlement policies into one trust was the best path forward.

11 11. As demonstrated by the fact that policies had lapsed pre-receivership, it was
12 apparent to me that the master trust/sub-trust structure was neither tenable nor cost-effective
13 for maintaining and preserving the individual policies owned by the separate sub-trusts in
14 which individual investors hold fractional interest positions as beneficiaries. This is because
15 under that structure, if one investor does not pay their pro rata portion of the premiums, fees,
16 and expenses when they are due (this is referred to as a "premium call"), then the entire
17 policy is at risk of lapsing, thereby causing the entirety of the death benefit to be lost to all
18 of the fractional interest position holders in that particular sub-trust.

19 12. There were as many as 360 investors that purchased one or more fractional
20 interest positions in a single sub-trust holding a single life insurance policy. Each individual
21 investor's economic position was tied to only one policy. Therefore, depending on the
22 specific policy at issue, there could be up to 360 investors unwittingly co-dependent upon
23 each other to pay premiums, fees, and expenses, all while their respective interests in
24 distinct portions of the death benefits are tied to a single policy covering a single individual
25 life.

26 13. The Debtor's structure was further complicated because for some policies,
27 100% of the fractional interests were not allocated, although the unallocated shares' portion
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1 of the premium still needed to be paid. However, the Debtor had no operating income or
2 stream of revenue with which to pay the unallocated shares' portion of the premiums. In
3 addition, where investors forfeited interests, the portion of the premiums attributable to the
4 forfeited interests still needed to be paid, but the Debtor had no source of funds with which
5 to pay those premiums. Where sub-trusts had unallocated or forfeited shares (which they all
6 did), every other investor's beneficial interest in the sub-trust was put at risk by the Debtor's
7 inability to pay the premiums associated with unallocated or forfeited interests.

8 14. I believe that the alternative to the Debtor's sub-trust structure that best
9 serves investors is a pooled trust structure where those investors who choose to remain
10 invested and who continue to pay premiums in the future will have their investment changed
11 from a fractional interest positions in a single sub-to a fractional interest position in the
12 pooled portfolio as a whole where they are allocated the same amount of death benefits that
13 were attributable to their beneficial interest in the sub-trust. Under this structure, each
14 individual investor's respective outcome is no longer tied to a single life/policy; nor are the
15 investors co-dependent on the other investors in that single policy; rather, each investor will
16 hold a stake in the overall outcome among the entire population of lives covered by the
17 policies in the pooled portfolio.

18 15. The pooled portfolio is also more consistently equitable across all investors
19 because under the pooled portfolio, whenever an insured dies, each active investor will
20 receive a pro rata portion of the cash to be distributed. This is not possible in the sub-trust
21 structure because only those investors in the sub-trust that holds the policy where the
22 insured dies receive a payout.

23 16. Under the pooled portfolio structure, investors will still need to pay their pro
24 rata share of premiums, fees, and expenses going forward. However, the advantage is that
25 the rate at which these costs change over time will be generally more gradual, and more
26 predictable. For investors currently holding positions in sub-trusts holding very expensive
27 policies, their premium burden will decrease, in many cases significantly. For those
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1 investors who only hold positions tied to the least expensive policies, their premium
2 payment may rise slightly. However, I believe that the benefits of diversification, earlier
3 access to future cash flows, and the gradual decrease in costs as insureds die will more than
4 offset any short-term increase there might be for particular investors. I expect to continue to
5 retain ISC Services to do the billing and to provide investor support.

6 17. The pooled structure is also expected to be cheaper to administer going
7 forward because the complexities of taxation, administration, bookkeeping, accounting, and
8 other economics can be spread across a single vehicle. As insureds die and policies mature,
9 the costs of administration will continue to decline because there will be fewer and fewer
10 policies to service and fewer premiums to pay.

11 18. In addition, if there are sufficient additional forfeitures in the future such that
12 a policy or policies can be sold because they are not needed to maintain the dollar amount of
13 death benefits necessary for those who elect to remain active, the net proceeds of any sale
14 can be used to fund payments under the Debtor's chapter 11 plan.

15 **THE PROCESS OF IDENTIFYING THE POLICIES TO BE POOLED**

16 19. In addition to the necessity of billing Reliant clients to generate funds to pay
17 the premiums due on a monthly basis, we have used the process to identify which Reliant
18 clients were interested in preserving the death benefits that they invested in and which were
19 not. This was important to assist us in determining the dollar amount of death benefits that
20 the Debtor must ensure are maintained. We anticipate that as additional clients elect to
21 forfeit, we will be able to further liquidate policies both to generate funds for creditors and
22 to avoid having to pay premiums for policies that Reliant no longer needs to maintain.

23 20. ISC completed medical updates for the policies that remain in effect, and a
24 true and correct copy of the list of policies, with the amount of death benefits attributable to
25 each. After determining that as of September 29, 2025, the Debtor needed to maintain \$53.8
26 million of death benefits for those investors who want to continue to remain active, I worked
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with Mr. Conway to identify which policies could be sold or, if there was no value on the tertiary market, permitted to lapse.

21. As set forth in the Debtor's motion for authority to retain Melville Capital and to sell 7 policies, we identified 7 policies with total available death benefits of \$27,000,500 that the Debtor could shed prior to the hearing on confirmation of the plan in order to stem the quarterly losses and generate funds for the estate and because the policies are not going to be needed to preserve the death benefits that the Debtor will need to maintain under the pooling concept. The Policies we identified were the following:

Policy Number	Total Death Benefit	Amount of Death Benefits Retained by Third Parties	Estimated monthly premium
AR-SJ2361 ¹	\$6,750,000	\$499,500	\$39,308.00
AR-PC4205	\$1,500,000		\$1,297.80
AR-EJ3741	\$1,500,000		\$1,845.80
AR-MH8921	\$8,500,000	\$750,000	\$11,342.30
AN-SR5034	\$400,000		\$4,456.20
AN-SZ3540T	\$4,800,000		\$12,834.90
AN-SZ0186A	\$4,800,000		\$8,437.20

22. The Policies were chosen for various reasons. Two of them cover the same insured and the Receivership Trust owns a third policy covering that insured, so selling two of the three preserves the same measure of diversification in the remaining portfolio. The \$400,000 policy is a small one and was selected because it is more difficult to service and its small death benefit is not needed to support the Debtor's efforts to maintain enough death

¹ The Debtor was previously authorized to use its grantor interest in the Original Trust to permit this policy to lapse because based on the lengthy life expectancy of the insured, the future premiums owed exceeded the discounted present value of the expected death benefit and because there were \$499,500 held by third party beneficiaries who were not contributing to the payment of the premiums. The policy has not yet lapsed, and there is a secondary guarantee feature that keeps the policy in force until March of 2026 so that if the insured dies prior to then, the policy will pay out. Based on the medical analysis, we believe that there is a small likelihood that will occur.

1 benefit for active investors. Two had death benefits retained by third parties who do not
2 contribute to the premiums, leaving others to pay their share of the premiums. SJ2361 was
3 previously authorized to be abandoned and the third-party beneficiaries were given notice.
4 The other two are for smaller face amounts and insure women, who I am informed
5 statistically live longer than men, making those less preferable. In addition, by shedding
6 these seven policies, we ensured that the policies that would become part of the pooled
7 portfolio were diverse and that the premiums that would need to be paid would not
8 drastically increase (and thereby force investors to forfeit simply because of the sharp
9 increase in the premium payment). A significant amount of analysis went into the
10 identification of policies to sell, lapse, and keep.

11 23. Ultimately, the decision of whether to pool the life settlement policies is
12 being made by the investors, who have been given an opportunity to vote on the Plan and
13 the pooling concept it will implement. As set forth in the declaration regarding ballot
14 tabulation, the pooling proposal has been overwhelmingly approved by the investors.

15 **FEASIBILITY**

16 24. There are two components of feasibility—the payments due on the Effective
17 Date of the Plan and the longer-term implementation of the Plan.

18 25. The Plan provides for the formation of the Reliant Life Shares Liquidating
19 Trust and for my appointment as the liquidating trustee pursuant to the terms of the
20 Liquidating Trust Agreement that was attached as Exhibit 1 to the Disclosure Statement.
21 All of the Debtor's assets will vest in the Liquidating Trust on the Effective Date. As of the
22 Effective Date, we are estimating that there will be administrative claims of approximately
23 \$4.18 million, some of which will not yet be allowed administrative claims. As of today,
24 the Debtor is holding \$614,089.71 and is expecting an additional \$3.425 million from the
25 sale of four policies closing imminently. Half of that amount will be available to the estate,
26 with the other half to be paid to the Cooper Parties to reduce their secured claim, as required
27 by the settlement that was reached and approved by the Court earlier on in the case. I have
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1 obtained the consents of administrative claimants to be paid as funds become available (and
2 after their claims are allowed) rather than being paid in full on the Effective Date. The
3 Liquidating Trust will balance the payment of allowed administrative claims with the
4 quarterly payments to be made for priority tax claims, which are not substantial. Thus, this
5 element of feasibility is satisfied.

6 26. Longer term, we are pursuing litigation against former insiders, sales agents,
7 and certain fiduciaries that we hope will result in recoveries for the Liquidating Trust. Some
8 of this litigation has already been filed, and other adversary proceedings are expected to be
9 filed after confirmation of the Plan. In addition, as evidenced by the forfeitures that have
10 occurred during the pendency of this case, we expect that there will be additional forfeitures
11 along the way, and likely in sufficient amounts to permit the Liquidating Trust to exercise
12 the grantor interest in the Receivership Trust to cause additional policies to be sold. As a
13 last resort, the Plan and Liquidating Trust Agreement permit death benefits to be used to pay
14 the administrative expenses of the Liquidating Trust.

15 27. Class 3a is comprised of active investors. The Plan is feasible as to this class
16 because as long as they continue to pay premiums, they will maintain their death benefits
17 and receive their pro rata share of the death benefits as the policies mature. With respect to
18 the remaining classes of general unsecured creditors, the Plan does not guarantee any
19 recovery but instead provides that if there are recoveries and funds available, they will be
20 distributed first to those in Classes 3b and 3c and then to Class 3d.

21 28. Similarly, there is no guarantee that the Cooper Parties, who hold a \$5
22 million secured claim, will be paid in full. Instead, they will share in Excess Cash, as that
23 term was defined in their settlement agreement, until they have received \$5 million. There
24 is not a guarantee that they will be paid in full on their secured claim. The other secured
25 creditors consist of two judgment creditors who did not file claims in the case and the
26 Debtor has not yet been able to verify that the judgments are in fact outstanding although it
27 is in the process of doing so. If allowed, they will be paid from funds on hand. The tax lien
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1 of the Los Angeles County Tax Collector, which is for approximately \$224.18, will be paid
2 in full from funds on hand on the Effective Date.

3 **LIQUIDATION ANALYSIS**

4 29. In a chapter 7 liquidation, a chapter 7 trustee would not continue to invoice
5 the beneficiaries of the sub trusts until the life settlement policies matured and would instead
6 be expected to use the Debtor's grantor interest in the trust to liquidate the portfolio of life
7 settlement policies or permit them to lapse. Either way, it would harm those with active
8 positions and eviscerate their beneficial interests.

9 30. I have estimated that if the 15 remaining policies were liquidated by a trustee,
10 the trustee would receive a total of approximately 20% of the available death benefits as
11 compensation. Some of the policies would generate more, as evidenced by the recent sale
12 of three of the policies, but others would generate less, if they could be sold at all. This is
13 exemplified by the fact that of the 7 policies marketed by Melville, only 4 received offers.
14 Specifically, of the 7 policies marketed by Melville with total death benefits of \$27,000,500,
15 \$3.4 million was received, or 12.59% of the death benefits that were available for sale. A
16 true and correct copy of the liquidation analysis, which was also attached to the Disclosure
17 Statement as Exhibit 3, is attached as Exhibit 1 hereto.

18 **RESPONSE TO ISSUES RAISED BY MR. IRWIN'S OBJECTION**

19 31. As I understand the thrust of Mr. Irwin's objection to the plan's proposal to
20 pool the remaining policies into one pool, it is that he believes that a more preferable and
21 equitable outcome could be had by creating three different pools and he appears to propose
22 to group the three pools based on the mean life expectancies, with investors who invested
23 earlier placed into the pool that has the shortest life expectancies and investors who invested
24 later placed into the pool with the longest life expectancies. Under his proposal, he would be
25 included in the pool with the shortest life expectancies because he was an earlier investor.
26 He also appears to believe that the seven policies that the Debtor obtained approval to sell
27 will not be sold until after confirmation of the plan, but that is not the case. The sales of
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1 four of the seven policies (as discussed above) have either already closed or are in the
2 process of closing shortly.

3 32. In addition to the additional administrative expense that would be incurred
4 with three different pools of policies, this proposal would also make it more difficult to shed
5 unnecessary policies. The Debtor does not intend to sell forfeited interests to new investors
6 so if an investor within a smaller pool decided to forfeit, then that will either require that the
7 remaining investors in that pool shoulder an additional burden (which could in turn lead to
8 more forfeitures) or require the Liquidating Trust to fund the difference, which it would
9 likely be unable to do. In addition, the Plan's proposal on pooling has been overwhelmingly
10 approved by those directly impacted by it, with only 9 of 230 investors voting against it,
11 which mean that it was accepted by 96.23% of claimants and 96.71% by dollar amount.
12 Even if I believed that Mr. Irwin's approach were preferable, which I do not, it would
13 require an entirely new plan for creditors to vote on, which entails additional expense, delay,
14 and risk.

15 I declare under penalty of perjury under the laws of the United States of America
16 that the foregoing is true and correct.

17 Executed on this 17th day of December, 2025, at Irvine, California.

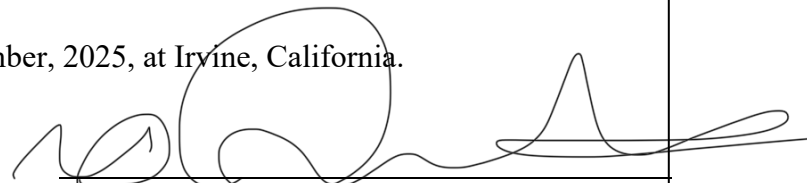
18 
19
20 NICHOLAS D. RUBIN

EXHIBIT 1

Reliant Life Shares - Chapter 11 Plan Recovery Analysis

Chapter 11 Plan Recovery Analysis, estimated as of Effective Date 11/30/2025

	Estimated Value - Proposed Plan ^(1a)	Estimated Value - Proposed Plan ^(1b)	Estimated Value - Proposed Plan ^(1c)	Estimated Value - Hypothetical Ch. 7 Liquidation
A. Asset Proceeds				
Cash on Hand ⁽²⁾	\$ 498,468	\$ 498,468	\$ 498,468	\$ 498,468
Accounts Receivable ⁽³⁾	\$ 664,442	\$ 664,442	\$ 664,442	\$ -
Policies ⁽⁴⁾	\$ 59,800,000	\$ 59,800,000	\$ 59,800,000	\$ 12,287,681
Professional Retainers	\$ 535,000	\$ 535,000	\$ 535,000	\$ 535,000
Retained Causes of Action ⁽⁵⁾	\$ 2,500,000	\$ 5,000,000	\$ 10,000,000	Unknown
Total Asset Proceeds	\$ 63,997,910	\$ 66,497,910	\$ 71,497,910	\$ 13,321,149
B. Secured Claims, Reserved Claims and Liquidation Costs				
	<i>Estimated Recovery</i>	<i>Estimated Recovery</i>	<i>Estimated Recovery</i>	<i>Estimated Recovery</i>
Class 1a ⁽⁶⁾	\$ 71,232	\$ 71,232	\$ 71,232	\$ 71,232
Class 1b ⁽⁷⁾	\$ 4,584,559	\$ 4,584,559	\$ 4,584,559	\$ 14,974,812
Accrued and Unpaid Professional Fees ⁽⁸⁾	\$ 3,268,077	\$ 3,268,077	\$ 3,268,077	\$ 3,268,077
Administrative Expense Claims ⁽⁹⁾	\$ 1,839,081	\$ 1,839,081	\$ 1,839,081	\$ 7,230,405
Priority Claims	\$ -	\$ -	\$ -	\$ -
UST Fees	\$ 608,573	\$ 688,573	\$ 768,573	\$ -
Total Administrative, Priority and Secured Claims	\$ 10,371,521	\$ 10,451,521	\$ 10,531,521	\$ 25,544,526
C. Post Effective Date Expenses				
Trust administration (Net of Income)	\$ 2,500,000	\$ 3,500,000	\$ 4,500,000	\$ -
Ch 7 Trustee Fees (3% of Asset Proceeds)	\$ -	\$ -	\$ -	\$ 399,634
Ch 7 Professional Expenses	\$ -	\$ -	\$ -	\$ 1,000,000
Total Costs to Liquidate Assets	\$ 2,500,000	\$ 3,500,000	\$ 4,500,000	\$ 1,399,634
Net Available Proceeds for General Unsecured Claims	\$ 51,126,388	\$ 52,546,388	\$ 56,466,388	\$ (13,623,011)
D. General Unsecured Claims				
Class 3a ⁽¹⁰⁾	\$ 53,987,689	\$ 53,987,689	\$ 53,987,689	\$ -
Class 3b ⁽¹¹⁾	\$ 5,000,000	\$ 5,000,000	\$ 5,000,000	\$ -
Class 3c ⁽¹²⁾	\$ 5,000,000	\$ 5,000,000	\$ 5,000,000	\$ -
Class 3d ⁽¹³⁾	\$ 71,012,311	\$ 71,012,311	\$ 71,012,311	\$ 125,000,000
Equity Interests	N/A	N/A	N/A	N/A
Total General Unsecured Claims	\$ 135,000,000	\$ 135,000,000	\$ 135,000,000	\$ 125,000,000
Implied Percentage Recovery for Active Investors in Class 3a	94.7%	97.3%	100.0%	0.0%

Notes to Plan Recovery Analysis
(1a) Proposed Plan - Low Case: Assumes no material recovery from pending litigation claims. Total distributable value reflects only core business operations and liquidation of non-core assets, with \$2.5mm litigation value included.
(1b) Proposed Plan - Mid Case: Assumes partial recovery of litigation against former owners, agents, and/or third parties. Recovery is estimated at \$7.5mm.
(1c) Proposed Plan - High Case: Assumes a favorable outcome across all major litigation matters, including potential punitive damages. This scenario contemplates successful prosecution of claims related to misconduct by financial institutions and sales representatives, with a substantial net recovery to the estate. Total estimated recovery is \$15mm.
(2) Cash on Hand - This amount may increase based on the sale of excess policies.
(3) Accounts Receivable - This includes the total amount placed on payment plans and account fees owed by investors.
(4) Policies - The value of the policies in the Proposed Plan reflects the total death benefit. The value of the policies in a Chapter 7 liquidation represents the estimated maximum realizable value, as determined by the CRO and Industry Expert, assuming the policies were sold as of the Effective Date (NPV 15%). Assumes the trustee utilizes the debtor's grantor interest in the trust to transfer the policies to the estate.
(5) Retained Causes of Action - All Retained Causes of Action continue to be investigated and the aggregate value and collectability of the Retained Causes of Action can range from \$1mm to \$20mm.
(6) Class 1a - Secured Judgement Lien Claims of E Substance and Mikhail Finkelbaum.
(7) Class 1b - Allowed Secured Claim of the Cooper Parties.
(8) Accrued and Unpaid Professional Fees - Reflects the total amount of professional fees accrued and estimated to be incurred and not paid prior to the Effective Date.
(9) Administrative Expense Claims - Includes all amounts collected post-petition, as well as fees and expenses incurred by parties during the receivership.
(10) Class 3a - Allowed General Unsecured Claims filed by Investors related to active positions in the Original Trust or the New Trust including those in the sub-trust that held the matured life insurance policy LH6768, who were active as of the Effective Date and continue to pay premiums through the maturity of all policies.
(11) Class 3b - Allowed Unsecured Claim of the Cooper Parties, trade claims, and all General Unsecured Claims other than those in Class 3a, 3c, or 3d.
(12) Class 3c - Subordinated Claim of the Cooper Parties.
(13) Class 3d - Subordinated Claims of Investors Related to Forfeited Positions Who Have Assigned Personal Claims to the Estate.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1900 Avenue of the Stars, 19th Floor, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*):

AMENDED DECLARATION OF NICHOLAS D. RUBIN IN SUPPORT OF CONFIRMATION OF THE SECOND AMENDED CHAPTER 11 PLAN OF LIQUIDATION

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On December 17, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Anerio V Altman** aaltman@ecf.courtdrive.com, lakeforestpacer@gmail.com
- **Kyra E Andrassy** kandrassy@raineslaw.com, bclark@raineslaw.com;csantiago@raineslaw.com
- **Eric Bensamochan** eric@eblawfirm.us,
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- **Robert M Yaspan - SUSPENDED BK -** court@yaspanlaw.com, tmenachian@yaspanlaw.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On December 17, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Louis Irwin
3011 Phillips Ct
Richmond, CA 94806

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on December 17, 2025 I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Louis Irwin
E-mail: newlou4546@yahoo.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 17, 2025
Date

Bambi Clark
Printed Name

/s/ Bambi Clark
Signature