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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION

In re:

ROSLAND CAPITAL LLC, a Delaware
limited liability company

Debtor.

Case No.: 2:26-bk-16650-BB

Chapter 11

**OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' MOTION
PURSUANT TO BANKRUPTCY RULE
2004 AND LOCAL BANKRUPTCY RULE
2004-1 FOR AN ORDER: (1) DIRECTING
THE PRODUCTION OF DOCUMENTS
AND INFORMATION FROM ERIK VON
DETEN; AND (2) AUTHORIZING
ISSUANCE OF A SUBPOENA FOR
PRODUCTION OF DOCUMENTS;
MEMORANDUM OF POINTS AND
AUTHORITIES; AND DECLARATION OF
ANDREW C. EHRLMANN IN SUPPORT**

[No Hearing Required Pursuant to Local
Bankruptcy Rule 2004-1(d) and 9013-1(p)]

1 **TO THE HONORABLE SHERI BLUEBOND, UNITED STATES BANKRUPTCY JUDGE:**

2 The Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned
3 case (this “Case”), by and through its undersigned counsel, hereby files this motion
4 (this “Motion”), pursuant to rule 2004 of the Federal Rules of Bankruptcy Procedure
5 (the “Bankruptcy Rules”) for entry of an order, substantially in the form attached hereto as
6 **Exhibit 1** (the “Proposed Order”), (a) requiring Erik Von Detten (“Von Detten” or the “Producing
7 Party”), to produce on a rolling basis, but in no event later than seven days from entry of the
8 Proposed Order, all documents and information within the Producing Party’s possession, custody,
9 or control that are responsive to the requests for production listed in Attachment A (the “Requested
10 Documents”) to the subpoena attached as **Exhibit 2** (the “Subpoena”), (b) authorizing the
11 Committee to issue the Subpoena to the Producing Party to compel the production of the Requested
12 Documents (the “Requested Production”), and (c) authorizing, but not requiring the Committee to
13 compel an examination of the Producing Party by issuance of a further subpoena (the “Requested
14 Deposition”).
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17 **JURISDICTION AND VENUE**

18 The Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(b)
19 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b).

20 Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

21 The statutory predicates for the relief requested herein are section 1103 of title 11 of the
22 United States Code (the “Bankruptcy Code”), Bankruptcy Rule 2004, and rule 2004-1 of the Local
23 Bankruptcy Rules of the United States Bankruptcy Court for the Central District of California
24 (the “Local Bankruptcy Rules”).
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BACKGROUND

General Background

On July 2, 2026 (the “Petition Date”), Rosland Capital LLC (the “Debtor”) filed a voluntary petition under chapter 11 of the Bankruptcy Code. Michael Hogan has, subject to this Court’s approval, been appointed as the Chief Restructuring Officer of the Debtor (the “CRO”). See Docket No. 46. The Debtor continues to operate its business and manage its property as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

On July 29, 2026, pursuant to section 1102 of the Bankruptcy Code, the Office of the United States Trustee for Region 16 (the “U.S. Trustee”) appointed the Committee. Docket No. 37. The Committee consists of the following five (5) members: (i) Neil Christen, (ii) Gary S. Cadigan, (iii) Faith Anne Carle, (iv) Thomas M. Dukes, Jr., and (v) Norman Greenberg individually and as trustee of the Sheila & Norman Greenberg family trust DTD.

Additional information about the Debtor’s Case is set forth in the *Declaration of Michael Hogan in Support of First Day Motions* [Docket No. 5] (the “First Day Declaration”).

On August 20, 2026, the Committee filed the *Motion of the Official Committee of Unsecured Creditors to Convert Debtor’s Chapter 11 Case to Chapter 7* [Docket No. 94] (the “Conversion Motion”),¹ seeking conversion of this Case to a case under chapter 7 of the Bankruptcy Code. The Conversion Motion is set to be heard by the Court on September 30, 2026.

The Committee’s Investigation

On August 9, 2026, the Committee retained its lead counsel and financial advisor. Since that time, the Committee’s professionals have worked diligently to learn the background of the Debtor’s business, analyze the Debtor’s proposed sale and marketing process, investigate claims and causes of action held by the estate, and determine the best path forward for this Case generally. This investigation has included informal conversations and requests for production with the Debtor

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Conversion Motion.

1 and third parties related to the Debtor. Unfortunately, the Committee's investigation has hit several
2 roadblocks, including with Von Detten, in the Committee's effort to conduct consensual discovery.
3 As a result of the Committee's difficulties to date, the Committee must now turn to the Court to
4 obtain even routine pieces of Committee diligence that fall squarely within the bounds of
5 Bankruptcy Rule 2004.

6 Despite its frustrations to this point, the Committee has begun to piece together the facts
7 which are central to the Case. Indeed, through the limited investigation the Committee has
8 overseen to date, it appears that the Producing Party played an instrumental part in the Debtor's
9 business and its financial collapse and was so deeply involved in the Debtor's operations and
10 business that he possesses knowledge and documents which would aid the Committee in its
11 investigation. Specifically, the Committee has learned through the course of its investigation that
12 Von Detten played a critical role in attracting many of the Debtor's customers to purchase the
13 Debtor's precious metal offerings and is, at least tangentially, involved in many of the causes of
14 action asserted against the Debtor by the Debtor's customers, as discussed in greater detail in the
15 Conversion Motion.

16 **REQUESTED RELIEF**

17 The Committee seeks entry of an order, substantially in the form attached hereto as
18 **Exhibit 1**, (a) requiring the production of the Requested Documents on a rolling basis, but in no
19 event later than seven days after entry of the Proposed Order, (b) authorizing the Committee to
20 issue a subpoena substantially in the form attached hereto as **Exhibit 2** compelling production of
21 the Requested Documents, and (c) authorizing the Requested Deposition.

22 **BASIS FOR RELIEF**

23 As the official committee appointed in this case, the Committee has a statutory duty to
24 "investigate the acts, conduct, assets, liabilities, and financial condition of the debtor . . . and any
25 other matter relevant to the case or to the formulation of a plan." 11 U.S.C. § 1103(c)(2); *see also*
26 *Loop Corp. v. United States Trustee*, 379 F.3d 511, 519 (8th Cir. 2004) (recognizing the duty of a
27 creditors' committee to advance creditors' interests); *In re George Worthington Co.*, 921 F.2d 626,

633 (6th Cir. 1990) (“[T]he statutory duties imposed on an official unsecured creditors’ committee by section 1103 are essential to the ‘preservation of the estate.’”); *In re Haskell-Dawes, Inc.*, 188 B.R. 515, 519 (Bankr. E.D. Pa. 1995) (“The creditors’ committee is responsible for representing the interests of its constituents and maximizing their recovery.”); *see also* House Report No. 95–595, 95th Cong., 1st Session, 401–402 (1977) (“[Section 1102] provides for the appointment of creditors’ . . . committees, which will be the primary negotiating bodies for the formulation of the plan of reorganization.”).

Discovery under Bankruptcy Rule 2004 includes within its scope any matter that may relate to the property and assets of the estate, the financial condition of the debtor, and any matter that may affect the administration of a debtor’s estate. *See* Fed. R. Bankr. P. 2004(b); *see also In re Teleglobe Commc’ns Corp.*, 493 F.3d 345, 354 n.6 (3d Cir. 2007) (“Federal Rule of Bankruptcy 2004 allows parties with an interest in the bankruptcy estate to conduct discovery into matters affecting the estate.”). Bankruptcy Rule 2004 affords both debtors and creditors the broad rights of examination of a debtor’s or third party’s records. *See Snyder v. Soc’y Bank*, 181 B.R. 40, 41–42 (S.D. Tex. 1994) (citing *Cameron v. United States*, 231 U.S. 710, 716 (1914)). Bankruptcy Rule 2004 permits broad discovery because “[t]he purpose of a [Bankruptcy] Rule 2004 examination is to assist a party in interest in determining the nature and extent of the bankruptcy estate, revealing assets, examining transactions and assessing whether wrongdoing has occurred.” *In re Recoton Corp.*, 307 B.R. 751, 755 (Bankr. S.D.N.Y. 2004). As one court in this district has observed, “[t]he scope of a [Bankruptcy] Rule 2004 examination is exceptionally broad and [Bankruptcy] Rule 2004 examinations have been compared to a fishing expedition.” *In re Verity Health Sys. Of Cal.*, 2019 Bankr. LEXIS 2055, at *34–35 (Bankr. C.D. Cal. May 24, 2019); *see also Rigby v. Mastro (In re Mastro)*, 585 B.R. 587, 597 (9th Cir. BAP 2018) (“As the Rule’s text makes clear, the scope of a [Bankruptcy] Rule 2004 examination is ‘unfettered and broad’; the rule essentially permits a ‘fishing expedition.’”).

Consistent with the broad scope of Bankruptcy Rule 2004, the target of Bankruptcy Rule 2004 discovery is not limited to the debtor itself. *See In re Downs*, 2021 Bankr. LEXIS 2839, at *5

(Bankr. C.D. Cal. Oct. 13, 2021) (“[Bankruptcy] Rule 2004 allows parties in interest (especially bankruptcy trustees and others) to conduct general ‘fishing expedition’-type inquiries of parties, both previously joined in the proceeding and outside third parties, in order to discover assets, liabilities, improper transfers, and other important information related to the administration of a bankruptcy estate.”); *Mastro*, 585 B.R. at 597 (“And the [Bankruptcy Rule 2004] examination may ‘extend to third parties who had dealings with the debtor.’”); *In re Ionosphere Clubs, Inc.*, 156 B.R. 414, 432 (Bankr. S.D.N.Y. 1993) (“Because the purpose of the [Bankruptcy] Rule 2004 investigation is to aid in the discovery of assets, any third party who can be shown to have a relationship with the debtor can be made subject to a [Bankruptcy] Rule 2004 investigation.”); *In re Correria*, 589 B.R. 76, 108 (Bankr. N.D. Tex. 2018) (“Third parties are subject to examination pursuant to Bankruptcy Rule 2004 if they have knowledge of the debtor’s affairs.”). Accordingly, courts in this jurisdiction and others routinely require third parties to produce documentary and testimonial discovery pursuant to Bankruptcy Rule 2004. *See, e.g., In re Better 4 You Breakfast, Inc.*, Case No. 2:22-bk-10994-BB, Docket No. 196 (Bankr. C.D. Cal. Apr. 25, 2022); *In re Deshetler*, 453 B.R. 295, 311 (Bankr. S.D. Ohio 2011); *In re Correria*, 589 B.R. at 108-10; *In re Madison Williams & Co., LLC*, 2014 WL 56070 at *4 (Bankr. S.D.N.Y. Jan. 7, 2014); *In re Millennium Lab Holdings II, LLC*, 562 B.R. 614, 628 (Bankr. D. Del. 2016).

Here, the Motion should be granted because the information the Committee seeks falls within the broad contours of Bankruptcy Rule 2004. The Committee should be allowed to gather information and documents from the Producing Party to investigate potential estate causes of action, analyze the Debtor’s financial condition, and determine the viability of a potential sale of the Debtor’s assets and/or confirmation of a plan of liquidation. Specifically, the Committee seeks, among other things, information regarding: (i) the Debtor’s prepetition transactions; (ii) documents regarding the Debtor’s financial condition in the years leading to the bankruptcy filing, including, but not limited to, any loans it may have received; (iii) documents relating to the Debtor’s corporate governance; (iv) information regarding the Debtor’s insiders, equity holders, and any

1 non-debtor affiliates; (v) documents relating to the Debtor's capital structure; and (vi) other
2 information relating to potential causes of action under various provisions of the Bankruptcy Code.

3 In sum, the information sought by the Requested Documents and Requested Deposition
4 falls within the permissible scope of discovery under Bankruptcy Rule 2004. Accordingly, the
5 relief requested herein should be granted to permit the Committee to adequately investigate claims
6 that may be asserted on behalf of the Debtor's estate. The relief requested would authorize the
7 Committee to determine "the nature and extent of the bankruptcy estate," and assess the value of
8 the assets of that estate. *See In re Enron Corp.*, 281 B.R. 836, 840 (Bankr. S.D.N.Y. 2002); *In re*
9 *Wash. Mut., Inc.*, 408 B.R. 45, 50 (Bankr. D. Del. 2009).

10 As more fully set forth in the Declaration of Andrew C. Ehrmann attached hereto, the
11 Committee has complied with its obligations under Local Bankruptcy Rule 2004-1 to meet and
12 confer with Von Detten regarding this Motion. While the parties have not been able to reach a
13 consensual resolution of the Motion to date, the Committee remains open and willing to engage in
14 further discussions regarding the relief sought herein.

15 **NO RELEVANT ADVERSARY PROCEEDING PENDING**

16 There is no relevant adversary proceeding currently pending in this case between the
17 Committee and Von Detten. The Committee seeks to examine Von Detten and to obtain
18 production of documents pursuant to Federal Rule of Bankruptcy Procedure ("FRBP") 2004, not
19 pursuant to FRBP 7030, which incorporates Federal Rule of Civil Procedure 30, or FRBP 9014.
20 *See* Ehrmann Declaration.

21 **NOTICE**

22 Notice of the Motion will be provided to: (a) the Producing Party and his counsel; (b) the
23 U.S. Trustee; and (c) any other person or entity entitled to notice pursuant to Bankruptcy Rule
24 2002. In light of the nature of the relief requested, the Committee respectfully submits that no
25 further notice of the Motion is necessary or required.

RESERVATION OF RIGHTS

The Committee reserves all rights to serve additional requests for documents or conduct additional examinations of any persons, including the Producing Party, pursuant to Bankruptcy Rule 2004 or otherwise, and to propound other or additional discovery requests in connection with this Case, including in any contested matter that may arise in this Case.

CONCLUSION

WHEREFORE, the Committee respectfully requests that this Court (i) grant the Motion and enter the Proposed Order (a) requiring the production of the Requested Documents on a rolling basis, but in no event later than seven days after entry of the Proposed Order, (b) authorizing the Committee to issue the Subpoena, (c) authorizing the Requested Deposition, and (ii) grant such other and further relief as it deems necessary and appropriate.

Respectfully submitted,

GOLDEN GOODRICH LLP

Dated: October 14, 2026

By: /s/ Jeffrey I. Golden

GOLDEN GOODRICH LLP

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*Counsel to the Official Committee
of Unsecured Creditors*

DECLARATION OF ANDREW C. EHLMANN

I, Andrew C. Ehrmann, declare as follows:

1. I am over the age of eighteen years, and if called upon to testify regarding the subject matter of this Declaration, I could and would do so competently. I am an associate with Ice Miller LLP. I have personal knowledge of the facts set forth herein and based on that personal knowledge I assert that all such facts are true and accurate to the best of my knowledge. To the extent I based my testimony upon information and belief or upon admissible evidence other than my personal knowledge, I will specifically state so.

2. I submit this Declaration with respect to the *Official Committee of Unsecured Creditors' Motion Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1 for an Order: (1) Directing the Production of Documents and Information from Erik Von Detten; and (2) Authorizing Issuance of a Subpoena for Production of Documents.*²

3. Upon information and belief, Erik Von Detten is an individual who resides in the state of California. I am not aware of Von Detten's current place of employment.

4. The Committee's counsel contacted Von Detten by overnight mail on August 28, 2026. Von Detten subsequently obtained counsel, who began engaging with counsel to the Committee on September 9, 2026. During that virtual meeting, the parties did not reach agreement regarding the scope and timing of production. Counsel to the Committee sent a subsequent email to counsel to Von Detten requesting Von Detten begin a rolling production of documents on or before September 23, 2026. Counsel to Von Detten responded to the Committee's request, declining to begin production within that time frame. Following the Committee's withdrawal of the Conversion Motion, the Committee's counsel once again reached out to counsel to Von Detten, requesting once again that Von Detten produce documents on or before October 12, 2026. Counsel to Von Detten declined to begin production by that date.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

5. Counsel to the Committee learned that Von Detten subsequently retained new counsel, who met and conferred with Committee counsel on October 12, 2026. At that meeting, the parties could not agree on the timing of production of documents.

6. The Committee cannot proceed under rule 7030 or rule 9014 of the Federal Rules of Bankruptcy Procedure because there is no pending contested matter or adversary to which the Committee is a party and in which the information the Committee seeks is relevant.

7. Attached hereto as Exhibit 1 is a true and correct copy of the Proposed Order.

8. Attached hereto as Exhibit 2 is a true and correct copy of the Subpoena requiring that the documents listed in Attachment A be produced.

I declare under penalty of perjury that the foregoing facts are known by me to be true and correct and based upon my personal knowledge.

Executed on October 14, 2026.

See Following Page
Andrew C. Ehrmann

1 5. Counsel to the Committee learned that Von Detten subsequently retained new
2 counsel, who met and conferred with Committee counsel on October 12, 2026. At that meeting, the
3 parties could not agree on the timing of production of documents.

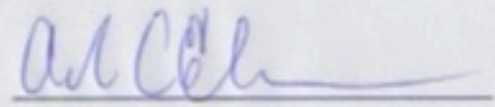
4 6. The Committee cannot proceed under rule 7030 or rule 9014 of the Federal Rules of
5 Bankruptcy Procedure because there is no pending contested matter or adversary to which the
6 Committee is a party and in which the information the Committee seeks is relevant.

7 7. Attached hereto as Exhibit 1 is a true and correct copy of the Proposed Order.

8 8. Attached hereto as Exhibit 2 is a true and correct copy of the Subpoena requiring
9 that the documents listed in Attachment A be produced.

10 I declare under penalty of perjury that the foregoing facts are known by me to be true and
11 correct and based upon my personal knowledge.

12 Executed on October 14, 2026.

13 
14 Andrew C. Ehrmann

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EXHIBIT 1
Proposed Order

GOLDEN GOODRICH LLP

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Counsel to the Official Committee

of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION

In re:

ROSLAND CAPITAL LLC, a Delaware
limited liability company

Debtor.

Case No.: 2:26-bk-16650-BB

Chapter 11

**ORDER PURSUANT TO BANKRUPTCY
RULE 2004: (1) DIRECTING THE
PRODUCTION OF DOCUMENTS AND
INFORMATION FROM ERIK VON
DETTEN; AND (2) AUTHORIZING
ISSUANCE OF A SUBPOENA FOR
PRODUCTION OF DOCUMENTS**

Upon consideration of the motion (the “Motion”)³ of the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned case (the “Case”); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found

³ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

1 that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that
2 venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and
3 1409; and this Court having found that the relief requested in the Motion is in the best interests of
4 the Debtor's estate, its creditors, and other parties in interest; and this Court having found that the
5 Committee's notice of the Motion and opportunity for a hearing on the Motion were appropriate
6 under the circumstances and no other notice need be provided; and this Court having reviewed the
7 Motion and having heard the statements in support of the relief requested therein at a hearing
8 before this Court, if any (the "Hearing"); and this Court having determined that the legal and
9 factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted
10 herein; and upon all of the proceedings had before this Court; and after due deliberation and
11 sufficient cause appearing therefor, it is hereby **ORDERED THAT:**

12 1. The Motion is GRANTED as set forth herein.

13 2. Any objections to the entry of this Order, to the extent not withdrawn or settled, are
14 overruled.

15 3. Erik Von Detten shall produce the Requested Documents, as set forth in
16 Attachment A to the Subpoena which is attached as Exhibit 2 to the Motion, on a rolling basis, but
17 in no event later than seven (7) days from entry of this Order.

18 4. The Committee is authorized to issue the Subpoena.

19 5. The Committee is authorized, but not required, to pursue the Requested Deposition
20 by issuing and serving a further subpoena upon Mr. Von Detten in accordance with applicable law.

21 6. All notices given in accordance with this Order shall be deemed sufficient and
22 adequate notice and in full compliance with the applicable provisions of the Bankruptcy Code, the
23 Bankruptcy Rules, and the Local Bankruptcy Rules.

24 7. All time periods set forth in this Order shall be calculated in accordance with
25 Bankruptcy Rule 9006(a).

1 8. Notice of the Motion as provided therein shall be deemed good and sufficient notice
2 of the Motion, and such notice satisfies the requirements of the Bankruptcy Rules and the Local
3 Bankruptcy Rules.

4 9. Nothing in this Order shall be deemed to limit or restrict the Committee's right to
5 seek further discovery or other additional examinations, including, but not limited to, under
6 Bankruptcy Rule 2004 or in the context of contested matters.

7 10. The Committee is authorized, but not directed, to take all actions necessary to
8 effectuate the relief granted in this Order in accordance with the Motion.

9 11. This Court retains jurisdiction with respect to all matters arising from or related to
10 the implementation, interpretation, and enforcement of this Order, including any discovery disputes
11 that may arise between or among the parties.

12 ###

EXHIBIT 2

UNITED STATES BANKRUPTCY COURT

Central

District of

California

In re Rosland Capital LLC

Debtor

Case No. 2:26-bk-16650-BB

Chapter 11

SUBPOENA FOR RULE 2004 EXAMINATION

To: Erik Von Detten

(Name of person to whom the subpoena is directed)

☐ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

PLACE	DATE AND TIME

The examination will be recorded by this method: _____

☒ **Production:** You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: [See Exhibit A for a list of documents to be produced and definitions related thereto.](#) [The deadline for the requested production of documents is seven \(7\) days from entry of the attached Order at Golden Goodrich LLP, 3070 Bristol Street, Suite 640, Costa Mesa, CA 92626.](#)

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/14/2026

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party) Official Creditors' Committee, who issues or requests this subpoena, are:

Jeffrey Golden, Golden Goodrich LLP, 3070 Bristol St., #640, Costa Mesa, CA 92626, jgolden@go2.law, 714-966-1000

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____ .

☒ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ .

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) *Contempt.* The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

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EXHIBIT A

Erik Von Detten Requests for Production

DEFINITIONS

The following definitions shall apply to the Committee's Requests:

1. "Armanino" shall mean Armanino Advisory LLC, in its capacity as financial advisor to the Debtor, as well as all of its agents, officers, directors, members, representatives, employees, affiliates, or other persons acting on its behalf in that capacity.

2. "Board" shall mean any board of directors, board of managers, manager, managing member, or other governing body of the Debtor, including any committee or independent director thereof.

3. "Buy Back Program" shall mean the Debtor's repurchase program pursuant to which customers could sell precious metals back to the Debtor, as described in paragraph 26 of the Hogan Declaration.

4. "Case" shall mean the above-captioned bankruptcy case of Rosland Capital, LLC.

5. "CRO" shall mean Michael Hogan, the Chief Restructuring Officer of the Debtor.

6. "Customer Claims" shall mean all claims, whether liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal equitable secured, or unsecured, asserted against the Debtor by any past or current customer of the Debtor, whether or not the Debtor has scheduled such claim, including, without limitation any claims related to the Debtor's Deferred Revenue Obligations and the Buy Back Program.

7. "Customer Information Assets" shall mean the Debtor's past, active, and potential customer lists, customer relationship information, customer data, marketing records, and related intangible assets of the Debtor.

8. "Debtor" shall mean Rosland Capital, LLC as well as all of its agents, officers, directors, members, representatives, employees, affiliates, or other persons acting on its behalf.

9. "Deferred Revenue" shall refer to all obligations of the Debtor related to the Debtor's failure to provide any customer with precious metal products for which the customer already paid the Debtor, as described in paragraph 25 of the Hogan Declaration.

10. "Equity Trust" shall mean Equity Trust Company.

11. "GoldStar" shall mean GoldStar Trust.

12. “Hogan Declaration” shall mean the *Declaration of Michael Hogan In Support of First Day Motions* [Docket No. 5].

13. “Petition Date” shall mean July 2, 2026.

14. “Person” means any natural person and shall include any “entity” as such term is defined at 11 U.S.C. § 101(15).

15. “Rosland Hong Kong” means Rosland Capital Group Hong Kong as well as all of its agents, officers, directors, members, representatives, employees, affiliates, or other persons acting on its behalf.

16. “Von Detten,” “you,” or “your” means Erik Von Detten.

17. “Document” means and includes, without limitation, all written or printed matter of any kind, including the originals and all non-identical copies, whether different from the original by reason of any notes made on such copies or otherwise, including, without limitation, correspondence, e-mails, text messages, WhatsApp messages, memoranda, notes (handwritten, typed, or otherwise), evidence, affidavits, statements, letters, diaries, journals, date-books, day-timers, calendars, minutes, agendas, contracts, reports, studies, checks, statements, receipts, summaries, interoffice and intraoffice communications, ledgers, offers, performance evaluations, notations of any sort of conversation (including, without limitation, telephone conversations or meetings) and all drafts, alterations, modifications, changes, or amendments of any of the foregoing, and any and all mechanical, magnetic, audiotape, videotape, or electronic recordings or reproductions of any kind of any of the foregoing which are in the possession, custody, or control of the respondent and/or its present or former attorneys, agents, or representatives. “Document” also includes data stored or contained in computers, databases, servers, software applications, computer tapes, computer discs, or any other computer-related device and videotapes and audiotapes. The term “document” shall be construed to the broadest extent permitted by the Federal Rule of Civil Procedure 34(a).

18. “Relating to,” “related to,” “regarding,” or “concerning” mean containing, constituting, evidencing, embodying, reflecting, identifying, stating, showing or relating or referring to in any way, directly or indirectly, and is meant to include, among other documents,

documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by each Request.

19. The terms “any” and “all” shall be considered to include “each” and “every.”

20. The terms “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within the scope of the Request all responses that might otherwise be construed to be outside of its scope.

21. The term “including” shall be construed without limitation.

22. The use of the singular form of any word includes the plural and vice versa.

23. The terms “possession,” “custody,” and “control,” as used with respect to a document or other requested material, shall include, in addition to all documents in the actual possession of respondent, or its attorneys or agents, any materials, the location or proprietor of which is known to respondent, its attorneys, or agents.

24. Except as otherwise specified herein, terms which are not defined in these Requests shall have the definitions given to those terms by the Bankruptcy Code, Federal Rules of Bankruptcy Procedure (including the Federal Rules of Civil Procedure to the extent they are made applicable by the Bankruptcy Rules), and/or the Local Bankruptcy Rules of the United States Bankruptcy Court for the Central District of California.

INSTRUCTIONS

A. Each Request must be answered separately and fully in writing, under oath where required, unless it is objected to, in which event the reason(s) for objection shall be stated in lieu of an answer.

B. You are under a duty to supplement and amend a prior response if you obtain information upon the basis of which you know that the response was incorrect when made, or you know that the response, though correct when made, is no longer true and the circumstances are such that a failure to amend the response would be, in substance, a knowing concealment.

C. An objection or claim of privilege directed to part of a Request does not constitute an excuse for failure to respond to the parts of a Request for which no objection or claim of privilege is made. In the event you assert the attorney-client privilege and/or the work-product

1 doctrine or any other privilege as to any information, knowledge, or fact requested by any of the
2 following Requests, then, as to each Request subject to such assertion, please indicate the basis of
3 your assertion of privilege and identify the claimed privileged information, knowledge, or fact in
4 sufficient detail to permit the Court to reach a determination as to the propriety of such assertion.

5 D. In answering these Requests, you are requested to furnish all information which is
6 available to you, including, but not limited to, information in the possession of any attorney, agent,
7 consultant, investigator, representative, or anyone acting in cooperation or in concert with you.
8 You are required to produce a document if it is within your possession, custody, or control.
9 Possession, custody, or control includes constructive possession, such that you need not have
10 actual possession. As long as you have the right to compel the production from a third party
11 (including an agent or representative), you have possession, custody, or control.

12 E. If any document or any portion of a document is withheld under claim of a privilege,
13 furnish a list identifying each document for which a privilege is claimed, together with the
14 following information: date, author or sender, all addresses or recipients, type (e.g., letter,
15 memorandum, telegram, chart, photograph, etc.), subject matter of the document, the basis on
16 which a privilege is claimed, and the paragraph or paragraphs of the Request to which the
17 document corresponds. If you claim a privilege as to only a portion of a document, produce the
18 portion of the document as to which respondent does not claim a privilege.

19 F. If any document described in any of these Requests was, but no longer is, in your
20 possession, custody, or control, or in existence, state whether (a) it is missing or lost; (b) it has
21 been destroyed; (c) it has been transferred, voluntarily or involuntarily, to others, or; (d) it has been
22 disposed of otherwise. In each instance, explain the circumstances surrounding such disposition
23 and identify the person directing or authorizing the disposition and the date thereof. In addition,
24 identify each such document by listing its date, author or sender, all addresses or recipients, type
25 (e.g., letter, memorandum, telegram, chart, photograph, etc.), subject matter, present location and
26 custodian, and state whether the document or copies are still in existence.

1 G. The documents produced in response to these Requests for Production shall be
2 organized in accordance with the individual requests made herein. Each document should be
3 labeled to correspond with the categories in these Requests.

4 H. The space for answers following each Request is not intended to limit the answer
5 in any way or to suggest the length of the answer that is desired. Full and complete answers are
6 requested. If you require additional space to complete any answer, attach continuation sheets at
7 the end of these Requests and indicate on the continuation sheets the type and number of the
8 Request being answered (i.e., Request for Production No. 1).

9 I. If any Request cannot be answered in full after exercising due diligence to secure
10 the information requested, please so state and answer the Request to the extent possible, specifying
11 an inability to answer the remainder of any such Request and stating whatever information or
12 knowledge presently is available concerning the portion of said Request that assertedly could not
13 be answered.

14 J. Unless the time frame is stated in an individual request, each Request covers the
15 period from January 1, 2016, to the present.

16 K. Documents shall be produced in the form set forth in Appendix A hereto.

17 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

18 **The Sale:**

19 **Request No. 1:**

20 All documents relating to the Debtor's Customer Information Assets, including customer
21 databases, customer relationship management systems, lead databases, call records, marketing
22 databases, customer purchase histories, customer segmentation data, and all related metadata.

23 **Request No. 2:**

24 All analyses, valuations, appraisals, estimates, presentations, spreadsheets, memoranda, or
25 communications concerning the value of the Customer Information Assets, including any materials
26 estimating expected sale proceeds.

27 **Request No. 3:**

28 All documents concerning the proposed auction, marketing, or sale process for the
Customer Information Assets.

Request No. 4:

All engagement letters, work product, communications, presentations, memoranda, outreach materials, teaser documents, bidding procedures drafts, and analyses prepared by Armanino relating to the sale process for the Customer Information Assets.

Request No. 5:

All NDAs executed in connection with the proposed sale process for the Customer Information Assets.

Request No. 6:

All indications of interest, expressions of interest, letters of intent, term sheets, draft purchase agreements, bids, or bid-related communications regarding the Customer Information Assets.

Request No. 7:

All communications between the Debtor, Armanino, and any prospective purchaser concerning valuation, diligence, customer data, purchase price, transaction structure, privacy concerns, and bankruptcy-related issues relating to the Customer Information Assets.

Request No. 8:

Documentation sufficient to show the number of the Debtor's active customers, number of inactive customers, number of prospects/leads, customer acquisition costs, customer lifetime value calculations, historical conversion rates, and revenue generated from repeat customers.

General Estate Matters:

Request No. 9:

All analyses concerning whether Customer Claims or pending disputes impact the value or marketability of the Customer Information Assets.

Request No. 10:

Any analysis comparing expected recoveries under a chapter 11 sale process, a liquidating trust structure, and a chapter 7 liquidation for the Debtor.

Request No. 11:

Unredacted version of the Statements of Financial Affairs and Schedules of Assets and Liabilities [Docket No. 26], including any amendments thereto.

Request No. 12:

All audited and unaudited financial statements, including balance sheets, statements of income, and cash flows of the Debtor.

Request No. 13:

All analyses, reports, spreadsheets, presentations, or communications evaluating the quality, usability, or marketability of the Debtor's customer database.

Request No. 14:

Documents sufficient to identify every Customer Claim which the Debtor disputes or which is related to the Debtor's Deferred Revenue obligations or Buy Back Program.

Request No. 15:

All analyses, and documents supporting such analyses, supporting the calculation of the approximately \$49 million Deferred Revenue balance referred to in paragraph 25 of the Hogan Declaration.

Request No. 16:

All analyses, and documents supporting such analyses, supporting the calculation of the approximately \$11.8 million Buy Back Program liability referred to in paragraph 26 of the Hogan Declaration.

Request No. 17:

All Debtor policies and procedures governing customer deposits, order fulfillment, inventory purchases, hedging practices, and buyback transactions.

Request No. 18:

All analyses concerning order backlog, fulfillment delays, cost overruns, and losses caused by rising precious metal prices for the Debtor.

Request No. 19:

Documents sufficient to identify all customer complaints received by the Debtor from January 1, 2020 through the Petition Date, including summaries, complaint logs, complaint databases, customer service reports, escalation reports, and compliance reports.

Request No. 20:

All agreements, documents, and communications related to any agreement or proposed agreement between the Debtor and any person providing or offering to provide financing to the Debtor since January 1, 2021.

Request No. 21:

All analyses, documents, and communications related to any 11 U.S.C. § 503(b)(9), administrative, priority, and/or general unsecured claims which have been asserted against the Debtor or which the Debtor believes may or could be asserted against it.

Request No. 22:

All monthly income statements, balance sheets, and cash-flow statements from January 1, 2021 through the Petition Date for the Debtor, together with the chart of accounts, trial balances, and general-ledger detail.

Request No. 23:

The Debtor's current cash report.

Request No. 24:

Documents sufficient to show the Debtor's bank and investment accounts from to the present.

Request No. 25:

All bank statements, investment account statements and reconciliations from January 1, 2022 through the present.

Request No. 26:

Any wind-down budget or calculation of the amounts the Debtor must incur in order to fully wind down its business.

Request No. 27:

Documents reflecting the total tariffs paid by the Debtor since January 1, 2022 and any analysis regarding expected refunds of any such tariff payments.

Request No. 28:

Any documents reflecting calculations regarding lease or contract rejection damages for the Debtor.

Request No. 29:

Documents reflecting the salaries, bonuses and other compensation and/or benefits for the Debtor's former and current employees, including executives and board members, since January 1, 2022.

Request No. 30:

All of the Debtor's organizational documents, including operating agreements, as amended to date, along with all organizational charts of the Debtor and its affiliates, including Rosland Hong Kong.

Request No. 31:

A copy of, and all documents and communications related to, the Debtor's director and officer liability insurance, including the Debtor's recently extended policy.

Request No. 32:

Documents sufficient to show the Debtor's monthly balance of accrued tax liabilities for the period January 1, 2023 to the present.

Request No. 33:

All documents and communications concerning, relating to, or otherwise constituting, schedules of the Debtor's federal and state net operating losses for each tax year since January 1, 2020, including but not limited to, documents sufficient to show the beginning and ending balance of the net operating losses and the application of same.

Request No. 34:

All federal income tax returns filed by the Debtor for the six (6) years prior to the Petition Date.

Request No. 35:

All agreements between the Debtor and its customers concerning the purchase of precious metals and any goods or services.

Request No. 36:

Documents and communications related to the retention, employment, and/or termination of any professional of the debtor, including, without limitation, counsel, financial advisors, and other similar advisor services, since July 1, 2025.

Request No. 37:

Documents and communications related to the Debtor's conducting of business with Rosland Hong Kong.

Request No. 38:

Documents sufficient to trace the disposition of customer payments received for unfulfilled orders and proceeds received from the disposition of precious metals delivered under the Buy Back Program, including cash-receipts journals, cash-disbursement journals, wire and ACH registers, check registers, intercompany transfers, and records identifying amounts used for precious-metal purchases, operating expenses, commissions, customer refunds, insider payments, or affiliate transfers.

Request No. 39:

All documents and communications relating to the Debtor's decision to stop or limit acceptance of new customer orders, customer payments, and/or precious metals under the Buy Back Program.

Request No. 40:

Documents and communication related to the Debtor's decision to suspend advertising or sales activities.

Request No. 41:

Documents and communication related to the fulfillment of customer orders, including, without limitation, fulfillment delays, whether to refund any customers, and/or any decisions to prioritize the fulfillment or payment of particular customers.

Request No. 42:

All documents, communications, and analyses regarding any hedging strategy or decision not to engage in a hedging strategy of the Debtor and/or Rosland Hong Kong since January 1, 2016.

Request No. 43:

Documents sufficient to identify all investigations of the Debtor or Rosland Hong Kong, whether such investigation was criminal or civil, or by any private, governmental, or regulatory body since January 1, 2016.

Request No. 44:

Documents sufficient to identify all assets held by the Debtor since July 1, 2026.

Request No. 45:

All records and analyses demonstrating the Debtor's historical sales at a transaction level.

Request No. 46:

All scripts, materials, and other documents provided to employees of the Debtor related to the sale of previous metals or other operations of the Debtor's business.

Request No. 47:

All documents and communications related to customer complaints and any refund promises since July 1, 2025.

Request No. 48:

Documents and communications regarding any and all customer orders which were not fulfilled as of the Petition Date.

Request No. 49:

Documents and communications related to the decisions to terminate the sourcing of precious metal products in May 2026.

The Debtor's Insiders and Affiliates:

Request No. 50:

All agreements between the Debtor and Marin Aleksov, including, without limitation, employment agreements, consulting agreements, compensation arrangements, bonus arrangements, commission arrangements, expense reimbursements, indemnification agreements.

Request No. 51:

All communications regarding negotiation of all agreements between the Debtor and Marin Aleksov.

Request No. 52:

All agreements between the Debtor and Julian Aleksov, including, without limitation, employment agreements, consulting agreements, compensation arrangements, bonus arrangements, commission arrangements, expense reimbursements, indemnification agreements.

Request No. 53:

All communications regarding negotiation of all agreements between the Debtor and Julian Aleksov.

Request No. 54:

All agreements between the Debtor and Erik Von Detten, including, without limitation, employment agreements, consulting agreements, compensation arrangements, bonus arrangements, commission arrangements, expense reimbursements, indemnification agreements.

Request No. 55:

All communications regarding negotiation of all agreements between the Debtor and Erik Von Detten.

Request No. 56:

Documents sufficient to show all compensation, distributions, transfers, loans, repayments, reimbursements, commissions, bonuses, and other payments made to or for the benefit of Marin Aleksov, Julian Aleksov, and/or Erik Von Detten from January 1, 2020 through the Petition Date.

Request No. 57:

All personal loan agreements, promissory notes, advances, receivables, or other obligations owed by Marin Aleksov, Julian Aleksov, or Erik Von Detton to the Debtor.

Request No. 58:

All documents relating to the approximately \$2.2 million loan receivable owed by Marin Aleksov to the Debtor.

Request No. 59:

All documents relating to the approximately \$44,000 loan receivable owed by Julian Aleksov to the Debtor.

Request No. 60:

All correspondence among Marin Aleksov, Julian Aleksov, and the Debtor concerning liquidity issues, customer obligations, undelivered orders, Deferred Revenue, Buy Back Program obligations, restructuring alternatives, insolvency concerns, or bankruptcy planning.

Request No. 61:

All board materials, management reports, presentations, minutes, consents, emails, and memoranda discussing liquidity shortages, customer complaints, inability to satisfy orders, investigations, potential litigation, insolvency, or bankruptcy-related planning.

Request No. 62:

All contracts and/or agreements between the Debtor and Rosland Hong Kong.

Request No. 63:

All documents relating to purchases by the Debtor from Rosland Hong Kong.

Request No. 64:

All invoices, account statements, purchase orders, wire transfers, payments, credits, offsets, reconciliations, and correspondence between the Debtor and Rosland Hong Kong from January 1, 2020 through the Petition Date.

Request No. 65:

Documents sufficient to show all amounts paid by the Debtor to Rosland Hong Kong during the six (6) years before the Petition Date.

Request No. 66:

Documents sufficient to show all amounts owed by Rosland Hong Kong to the Debtor as of the Petition Date.

Request No. 67:

Documents sufficient to show all amounts owed by the Debtor to Rosland Hong Kong as of the Petition Date.

Request No. 68:

All communications concerning transfers of funds, inventory, customer deposits, licensing rights, intellectual property, commissions, or business opportunities between the Debtor and Rosland Hong Kong.

Request No. 69:

All analyses regarding ownership of intellectual property, customer information, trademarks, or licensing rights shared between the Debtor and Rosland Hong Kong.

Request No. 70:

All communications regarding winding down, transferring, preserving, or monetizing assets located at Rosland Hong Kong.

Request No. 71:

Documents and communications regarding any precious metals of the Debtor currently located at or controlled by Rosland Hong Kong.

Request No. 72:

Documents reflecting any company or third-party investigations into causes of action or potential breaches of fiduciary duty by the Debtor's directors or officers (or the company as a whole).

Request No. 73:

All organizational charts of the Debtor and all non-debtor affiliates for the period January 1, 2013 to the present.

Request No. 74:

All of the Debtor's board presentations, board resolutions, board minutes, board packages and board attendance records concerning meetings of the officers and/or directors (and all actions taken by written consent without a meeting), or such similar documents as applicable, for the six (6) years prior to the Petition Date.

Request No. 75:

Documents sufficient to show the Debtor's board members, directors, managers and/or officers for the six (6) years prior to the Petition Date.

Request No. 76:

All agreements between the Debtor and Equity Trust.

Request No. 77:

All documents and communications related to any agreement between the Debtor and Equity Trust.

Request No. 78:

Documents and communications related to Equity Trust, including, without limitation, all transfers of property between the Debtor and Equity Trust.

Request No. 79:

All agreements between the Debtor and GoldStar.

Request No. 80:

All documents and communications related to any agreement between the Debtor and Equity Trust.

Request No. 81:

Documents and communications related to GoldStar, including, without limitation, all transfers of property between the Debtor and GoldStar.

Request No. 82:

Documents and communications related to the loan the Debtor provided to Marin identified in Part 11 to the Debtor's Schedule A/B [Docket No. 26], including without limitation, all Board discussions, approvals, demands, and collection efforts.

Request No. 83:

Documents sufficient to identify each position you held with Rosland throughout your employment, the dates in which you held each of those positions, and your compensation in connection with your employment by the Debtor.

Request No. 84:

Transaction-level intercompany ledger or similar documents between the Debtor and Rosland Hong Kong including, without limitation, all transfers of cash and precious metals.

Additional Requests:

Request No. 85:

All agreements between you and the Debtor.

Request No. 86:

Documents and communications related to any transfers made between you and the Debtor since January 1, 2020.

Request No. 87:

Documents and communications related to the Debtor's use, storing, preservation, and sale of precious metals since January 1, 2020.

Request No. 88:

All materials provided to you as an employee of the Debtor related to the Debtor's sale of precious metals.

Request No. 89:

All documents and communications related to any compensation you received from the Debtor since January 1, 2020.

Request No. 90:

Documents and communications between you and Marin Aleksov regarding the Debtor, its business, or its bankruptcy filing since January 1, 2024.

Request No. 91:

Documents and communications between you and Julian Aleksov regarding the Debtor, its business, or its bankruptcy filing since January 1, 2024.

Request No. 92:

Documents and communications regarding the termination of your employment by the Debtor.

Request No. 93:

Documents and communications related to Marin Aleksov's role in the Debtor's business.

Request No. 94:

Documents and communications related to Marin Aleksov's role in Rosland Hong Kong.

Request No. 95:

Documents and communications related to Julian Aleksov's role in the Debtor's business.

Request No. 96:

Documents and communications related to Julian Aleksov's role in Rosland Hong Kong.

Request No. 97:

Documents and communications related to the Debtor's conducting of business with Rosland Hong Kong.

Request No. 98:

All Documents and communications between you and Equity Trust.

Request No. 99:

All documents and communications between you and Goldstar.

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:

3070 Bristol St., Suite 640, Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*): **OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004-1 FOR AN ORDER: (1) DIRECTING THE PRODUCTION OF DOCUMENTS AND INFORMATION FROM ERIK VON DETTEN; AND (2) AUTHORIZING ISSUANCE OF A SUBPOENA FOR PRODUCTION OF DOCUMENTS; MEMORANDUM OF POINTS AND AUTHORITIES; AND DECLARATION OF ANDREW C. EHRMANN IN SUPPORT** 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 indicated 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 (*date*) **October 14, 2026**, 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:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **October 14, 2026**, 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.

Honorable Sheri Bluebond
United States Bankruptcy Court
Central District of California
255 E. Temple St., Ste 1534/Ctrm 1539
Los Angeles, CA 90012

☐ 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 (*date*) **October 14, 2026**, 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.

Erik Von Detten	evondetten@gmail.com
Gary Starre	gastarre@gmail.com
Monica Arias	mmoonniiee@gmail.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.

October 14, 2026

Date

Leila Usmani

Printed Name


Signature

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Michael Abelow mabelow@srvhlaw.com
Michael Jay Berger michael.berger@bankruptcypower.com,
yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com
Roy L Carlson Jr rcarlson@surflaw.net, rmdscty@surflaw.net
Baruch C Cohen bcc@BaruchCohenEsq.com, paralegal@baruchcohenesq.com
Brian L. Davidoff bdavidoff@greenbergglusker.com,
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M Douglas Flahaut df@echoparklegal.com
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kadele@ecf.courtdrive.com;cbmeeker@gmail.com;lbracken@wgllp.com;dfitzgerald@go2.law;golden.jeffreyi.b117954@notify.bestcase.com;Risrael@go2.law
David M Goodrich dgoodrich@go2.law, kadele@go2.law;dfitzgerald@go2.law;wgllp@ecf.courtdrive.com
Kenneth C Greene ken@kengreenelaw.com
Shane Hicks shicks@zwickerpc.com
James Andrew Hinds jhinds@hindslawgroup.com;mduran@hindslawgroup.com, mduran@hindslawgroup.com
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Steven Phillip Ordaz sordaz@bmcgroup.com, info@ecfalerts.com
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