

1 Richard J. Reynolds (SBN 89911)
 E-mail: rreynolds@bwsllaw.com
 2 Joseph P. Buchman (SBN 148983)
 E-mail: jbuchman@bwsllaw.com
 3 Martin Kosla (SBN 247224)
 E-mail: mkosla@bwsllaw.com
 4 BURKE, WILLIAMS & SORESENSEN, LLP
 444 South Flower Street, 40th Floor
 5 Los Angeles, California 90071-2942
 Tel: 213.236.0600 Fax: 213.236.2700
 6
 7 Attorneys for Diablo Grande Community
 Facilities District No. 1

8 UNITED STATES BANKRUPTCY COURT
 9 EASTERN DISTRICT OF CALIFORNIA

11 In re
 12 DIABLO GRANDE COMMUNITY
 FACILITIES DISTRICT NO. 1,
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 Debtor.
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Case No. 25-26635-A-9
 DCN BWS-002
**MOTION FOR ORDER APPOINTING
 KURTZMAN CARSON CONSULTANTS,
 LLC DBA VERITA GLOBAL AS
 CLAIMS, NOTICING, AND BALLOTING
 AGENT PURSUANT TO 28 U.S.C. §156(c)
 AND RULE 2002 OF THE FEDERAL
 RULES OF BANKRUPTCY PROCEDURE**
 Date: April 1, 2026
 Time: 9:30 a.m.
 Dept.: Dept. A, Ctrm 11
 2500 Tulare Street, Fresno California

21 Diablo Grande Community Facilities District No. 1 (the "**Debtor**"), hereby moves for entry
 22 of an order appointing Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing,
 23 and Balloting Agent pursuant to 28 U.S.C. §156(c) and Rule 2002 of the Federal Rules of
 24 Bankruptcy Procedure (the "**Motion**"). A copy of the proposed form of order is attached hereto as
 25 Exhibit A. The Motion is supported by the concurrently filed and served Notice of Hearing on the
 26 Motion.
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I. BACKGROUND

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2 1. The Debtor is a community facilities district established by the Board of Directors
3 of the Western Hills Water District on September 24, 2000, pursuant to the Mello-Roos Act (Cal.
4 Gov't. Code §§ 53311-53368.3) (Resolution No. 2000-06). As such, the CFD is a municipality as
5 defined in section 101(40) of the Bankruptcy Code.

6 2. The Bankruptcy Case was commenced by the filing of the Debtor's Bankruptcy
7 Petition on November 25, 2025 (the "**Petition**") [Dkt. 1], after the Debtor's governing authority,
8 the Board of the Western Hills Water District (the "**Board**"), declared a fiscal emergency of the
9 Debtor [Dkt. 4].

10 3. On February 4, 2026, the Bankruptcy Court approved the form of Notice of
11 Commencement of Chapter 9 Bankruptcy Case and set April 3, 2026, as the deadline for filing
12 objections to the Chapter 9 Petition [Dkt. 23].

13 4. On March 12, 2026, the Debtor submitted its evidence proving service and
14 publication of the Notice of Commencement of Chapter 9 Bankruptcy Case in accordance with the
15 Court's February 4, 2026 Order [Dkt. 28, 29, 30, 31, 32, 33].

II. SUMMARY OF RELIEF REQUESTED

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17 5. The Debtor is seeking the Court's order appointing Kurtzman Carson Consultants,
18 LLC dba Verita Global ("**Noticing Agent**") as Claims, Noticing, and Balloting Agent in this case.
19 The Debtor's creditors include (1) the municipal bondholders, (2) Stanislaus County, and (3) the
20 Diablo Grande Homeowners' Association. The number of bondholders appears to be large, in
21 excess of 600 [Dkt. 28 and 30]. Given the size of the Debtor's creditor body, it would be
22 inefficient for the Debtor and the Court to undertake the task of sending notices to the creditors
23 and other parties in interest. Moreover, appointing the Noticing Agent to maintain a claims
24 register and to process claims and ballots will decrease the burdens of administering the Debtor's
25 case and will improve the efficiency of the noticing, claims administration, and ballot solicitation
26 processes. Accordingly, appointment of the Noticing Agent is in the best interests of the Debtor,
27 the creditors, and the Court.

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1 13. As set forth above, the Debtor has over 600 creditors. The size of the Debtor's
2 creditor body makes it inefficient for the Court and the Debtor to send notices to the creditors and
3 other parties in interest. The Debtor respectfully submits that the most effective and efficient
4 manner by which to provide claims administration, notice, and solicitation services in this case is
5 to authorize the Noticing Agent to act as an agent of the Court for these purposes.

6 14. Appointing the Noticing Agent to maintain a claims register and to process claims
7 will decrease burdens on the Court, which otherwise would maintain its claims register online and
8 likely would be inundated with mailings and electronic claim filings. Moreover, appointment of
9 the Noticing Agent will improve the accuracy and efficiency of the claims allowance process and
10 the solicitation and noticing process.

11 15. The Noticing Agent is a data processing firm that specializes in noticing, claims
12 processing, voting and other administrative tasks in chapter 11 cases. The Debtor has engaged the
13 Noticing Agent to send out certain designated notices and maintain claims files and a claims and
14 voting register. The Debtor believes that such assistance will expedite service of notices and
15 streamline the claims administration process.

16 16. The Noticing Agent is well-qualified to provide such services, expertise,
17 consultation and assistance. The Noticing Agent has assisted and advised numerous chapter 9 and
18 11 debtors in connection with noticing, claims administration and reconciliation and
19 administration of plan votes. The Noticing Agent has provided identical or substantially similar
20 services as those necessitated by the Debtor's chapter 9 case.

21 17. For the foregoing reasons, the Debtor believes that the authorization of the Noticing
22 Agent as the claims, noticing, and balloting agent is appropriate and in the best interests of the
23 Debtor, the creditors, and the Court.

24 18. The Debtor files this Motion without prejudice to or waiver of its rights pursuant to
25 Section 904 of the Bankruptcy Code, and nothing herein is intended as or shall be deemed to
26 constitute the Debtor's consent pursuant Section 904 of the Bankruptcy Code to this Court's
27 interference with (a) any of the political or governmental powers of the Debtor, (b) any of the
28 property or revenues of the Debtor, or (c) the Debtor's use or enjoyment of any income-producing

1 property.

2 **V. CONCLUSION**

3 For the foregoing reasons, the Debtor respectfully requests the Court, pursuant to 28
4 U.S.C. § 156(c) and Bankruptcy Rule 2002, to enter an order in substantially the same
5 form of the proposed order attached hereto as Exhibit A, ordering that:

6 1. Pursuant to 28 U.S.C. § 156(c), Kurtzman Carson Consultants, LLC dba
7 Verita Global (“Noticing Agent”) is authorized to serve as the claims agent as set forth in
8 the Motion and to serve notices as requested by the Debtor or the office of the Clerk of the
9 Bankruptcy Court for the Eastern District of California; and

10 2. The Order is without prejudice to the rights of the Debtor pursuant to
11 Section 904 of the Bankruptcy Code, and nothing herein is intended as or shall be deemed
12 to constitute the Debtor’s consent pursuant to Section 904 of the Bankruptcy Code to this
13 Court’s interference with (1) any of the political or governmental powers of the Debtor, (2)
14 any of the property or revenues of the Debtor, or (3) the Debtor’s use or enjoyment of any
15 income-producing property.

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17 Dated: March 18, 2026

BURKE, WILLIAMS & SORENSEN, LLP

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19 By: /s/ Joseph P. Buchman
20 Richard J. Reynolds
21 Joseph P. Buchman
22 Martin Kosla
23 Attorneys for Diablo Grande Community
24 Facilities District No. 1
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Exhibit A

1 Richard J. Reynolds (SBN 89911)
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8 UNITED STATES BANKRUPTCY COURT
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11 In re

12 DIABLO GRANDE COMMUNITY
 13 FACILITIES DISTRICT NO. 1,

14 Debtor.

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Case No. 25-26635-A-9

DCN BWS-002

**ORDER APPOINTING KURTZMAN
 CARSON CONSULTANTS, LLC DBA
 VERITA GLOBAL AS CLAIMS,
 NOTICING, AND BALLOTING AGENT
 PURSUANT TO 28 U.S.C. §156(c) AND
 RULE 2002 OF THE FEDERAL RULES
 OF BANKRUPTCY PROCEDURE**

Date: April 1, 2026
 Time: 9:30
 Dept.: Dept. A, Ctrm 11
 2500 Tulare Street, Fresno California

Upon consideration of the Motion For Order Appointing Kurtzman Carson Consultants, LLC dba Verita Global As Claims, Noticing, And Balloting Agent Pursuant To 28 U.S.C. §156(C) And Rule 2002 Of The Federal Rules Of Bankruptcy Procedure ("**Motion**"), filed by Diablo Grande Community Facilities District No. 1 (the "**Debtor**"), the Court finding that notice of the Motion was reasonable and appropriate under the circumstances and the Court determining the relief requested in the Motion is appropriate and in the best interests of the creditors and parties in interest in this case,

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IT IS HEREBY ORDERED THAT:

1. Pursuant to 28 U.S.C. § 156(c), Kurtzman Carson Consultants, LLC dba Verita Global (“Noticing Agent”) is authorized to serve as the claims agent as set forth in the Motion and to serve notices as requested by the Debtor or the office of the Clerk of the Bankruptcy Court for the Eastern District of California; and

2. This Order is without prejudice to the rights of the Debtor pursuant to Section 904 of the Bankruptcy Code, and nothing herein is intended as or shall be deemed to constitute the Debtor’s consent pursuant to Section 904 of the Bankruptcy Code to this Court’s interference with (1) any of the political or governmental powers of the Debtor, (2) any of the property or revenues of the Debtor, or (3) the Debtor’s use or enjoyment of any income-producing property.
