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6 SS PURCHCO, LLC, ACCELERATED ASSETS, LLC,  
and PAHRUMP VALLEY REAL ESTATE CO., LLC  
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SAN DIEGO

10 PEOPLE OF THE STATE OF  
11 CALIFORNIA, by and through the  
COMMISSIONER OF BUSINESS  
12 OVERSIGHT,

13 Plaintiff,

14 v.

15 SILVER SADDLE COMMERCIAL  
DEVELOPMENT, LP, a California limited  
16 partnership; SILVER SADDLE RANCH &  
CLUB, INC., a California corporation;  
17 THE GALILEO COMMERCIAL  
PROPERTY OWNERS ASSOCIATION,  
18 INC., a California non-profit corporation;  
THOMAS M. MANEY, an individual;  
19 ACCELERATED ASSETS, LLC, an  
Arizona limited liability company; SS  
20 PURCHCO, LLC, a Delaware limited  
liability company; PAHRUMP VALLEY  
21 REAL ESTATE CO., LLC, a Nevada  
limited liability company; and DOES 1  
22 through 100, inclusive,

23 Defendants.

24 And,

25 MARIAN G. DUCREUX, an individual,  
CLIFFORD J. REYNOLDS, an individual,  
26 WAYNE A. PEDERSEN, an individual,  
and Relief Does 1 through 10, inclusive,

27 Relief Defendants.  
28

CASE NO.: 37-2019-00049151-CU-MC-CTL

**DECLARATION OF PETER D. MOODY IN  
SUPPORT OF DEFENDANTS  
ACCELERATED ASSETS, LLC, SS  
PURCHCO, LLC, AND PAHRUMP  
VALLEY REAL ESTATE CO., LLC'S  
OPPOSITION TO DBO'S MOTION FOR  
PRELIMINARY INJUNCTION**

Date: July 24, 2020  
Time: 9:00 a.m.  
Dept.: C-73  
Judge: Hon. Joel R. Wohlfeil

1 I, Peter D. Moody, declare and state as follows:

2 1. I have personal knowledge of the facts stated herein.

3 2. I am a resident of the State of Arizona.

4 3. I am the Chief Business Development Officer of Equiant Financial Services Inc.  
5 ("Equiant"), located at 500 N. Juniper Drive, Suite 100, Chandler, Arizona 85226.

6 4. Equiant services a number of notes associated with the Galileo Project that is the  
7 subject of this litigation, including notes owned by Silver Saddle Commercial Development  
8 ("Silver Saddle") and notes pledged as collateral to and notes owned by SS Purchco, LLC  
9 ("Purchco"), which to the best of my knowledge is an affiliate of Accelerated Assets, LLC.

10 5. On or about December 20, 2019, Purchco instructed Equiant to cease any  
11 outbound collection activities directed toward the borrowers on Purchco's notes in the Galileo  
12 Project. On or about December 23, 2019, Equiant ceased such outbound collection activities.

13 6. In September of 2019, the court-appointed receiver for Silver Saddle instructed  
14 Equiant to cease collections on outstanding Galileo Project notes owned by Silver Saddle, and  
15 Equiant followed those instructions, ceasing such collections on or about September 26, 2019.

16 7. Pursuant to Purchco's request, Equiant has also removed all Silver Saddle related  
17 portfolios owned by Purchco from the collection queues and suppressed all letters to the  
18 borrowers, other than responses to inquiries made by those borrowers.

19 8. Currently, any funds Equiant still receives from voluntary or automated payments  
20 from borrowers with respect to Purchco-owned accounts are directed into an existing segregated  
21 lockbox account, as is customary for Equiant's servicing activities.

22 9. Equiant has responded to all inquiries from borrowers on the Purchco-owned  
23 accounts in Equiant's usual fashion for its servicing activities, consistent with applicable law  
24 regarding debtor inquiries as to debts and credit reporting.

25 10. Equiant has received, and continues to receive, telephone calls, emails, or letters  
26 from borrowers whose notes are owned by Purchco, inquiring about the status of their loans.  
27 Some of those inquiries refer to the existence of this litigation and question whether payments are  
28 due on the accounts.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 15, 2020 at Chandler, Arizona.

By:   
PETER D. MOODY