

1 LEONARD PEÑA (State Bar No. 192898)  
lpena@penalaw.com  
2 PEÑA & SOMA, APC  
lpena@penalaw.com  
3 1003 Diamond Ave., Suite 202  
4 Pasadena, California 91030  
Telephone (626)396-4000  
5 Facsimile (626)498-8875

6 Attorneys for  
7 AB and J Jewelry

8  
9 UNITED STATES BANKRUPTCY COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 RIVERSIDE DIVISION  
12

13 In re: ) Case No.: 6:25-bk-15659-SY  
14 )  
15 AB AND J JEWELRY ) Chapter 11  
16 Debtor and Debtor in ) STIPULATION AUTHORIZING THE  
17 Possession. ) CONTINUED USE OF CASH  
18 ) COLLATERAL  
19 ) [NO HEARING REQUIRED]  
)

20 AB and J Jewelry ("Debtor") and secured creditor GM Cold  
21 and Diamonds, LP ("GM") stipulate as follows:

22 **RELEVANT FACTS**

23 On August 12, 2025 (the "Petition Date"), Debtor filed a  
24 petition for relief under Chapter 11 of Title 11 of U.S.C. (the  
25 "Bankruptcy Code") at the above case caption and number (the "AB  
26 and J Jewelry Case").

27 On August 21, 2025, Debtor filed the *Debtor's Emergency*  
28 *Motion For Entry Of An Interim Order: (I) Authorizing The Debtor*

1 *To Utilize Cash Collateral Pursuant To 11 U.S.C. §§ 361, 362,*  
2 *363; (Ii) Granting Adequate Protection Pursuant To 11 U.S.C. §§*  
3 *361, 362, 363; (Iii) Scheduling A Final Hearing Pursuant To*  
4 *Bankruptcy Rules 4001(B); And (Iv) Granting Related Relief;*  
5 *Memorandum Of Points And Authorities In Support Thereof; Omnibus*  
6 *Declaration Of Abraham Perez In Support Thereof [Docket No. 11]*  
7 *(the "Cash Collateral Motion") to permit its use of cash*  
8 *collateral pursuant to §363 of the Bankruptcy Code.*

9       The Court held an interim hearing on the Cash Collateral  
10 Motion on August 26, 2025, and approved on an interim basis the  
11 Debtor's Interim Use of Cash Collateral and Establishing  
12 Adequate Protection by way of an Order of Court entered on  
13 August 28, 2025 [Doc. No. 30] (the "First Interim Order").

14       The Court held a final hearing on the Cash Collateral  
15 Motion on September 25, 2025 and approved on a final basis the  
16 Debtor's Use of Cash Collateral and Establishing Adequate  
17 Protection by way of an Order of Court entered on October 15,  
18 2025 [Doc. No. 55] (the "Final Order") authorizing the Debtor to  
19 use cash collateral through and including January 30, 2026.

20       GM holds a senior lien on and against, inter alia, Cash  
21 Collateral (as that term is defined in the Bankruptcy Code) and  
22 on all the personal property assets of the Debtor as  
23 more fully set forth in UCC-1 and related filings on file  
24 recorded with the California Secretary of State.

25       The Debtor asserts it has an immediate need to continue to  
26 use Cash Collateral and asserts that its estate and creditors  
27 will be immediately and irreparably harmed if it cannot access  
28

1 Cash Collateral. However, out of concern about adequate  
2 protection of its interest in its collateral, Debtor and GM have  
3 agreed that Debtor may use Cash Collateral including Cash  
4 Collateral providing this Court enters an order approving this  
5 Stipulation.

6 **THEREFORE**, the Debtor and GM stipulate and agree, subject  
7 to approval of the Bankruptcy Court, as follows:

- 8 1. Recitals. The foregoing recitals are incorporated herein  
9 by reference as if set forth in their entirety.
- 10 2. Consent to Use of Cash Collateral. GM consents to the  
11 use of its cash collateral on the same terms as  
12 described in Order of Court entered on October 15, 2025  
13 [Doc. No. 55] (the "Final Order") and incorporates all  
14 those terms herein with the only change that GM  
15 stipulates that the Debtor may use the cash collateral  
16 as described in the Final Order including and through  
17 April 30, 2026.

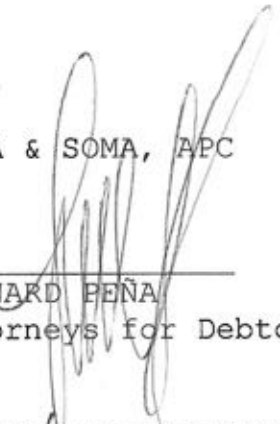
18  
19 **SO STIPULATED:**

20 DATED: January 30, 2026

PEÑA & SOMA, APC

21

22

By:   
LEONARD PEÑA  
Attorneys for Debtor

23

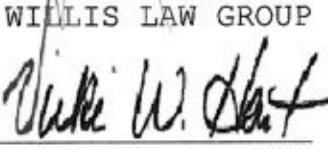
24

25 DATED: January 30, 2026

THE WILLIS LAW GROUP

26

27

By:   
VICKI W. HART  
Attorneys for GM Cold and  
Diamonds, LP

28

## 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:  
1003 Diamond Ave., Suite 202 South Pasadena, California 91030

A true and correct copy of the foregoing document entitled (*specify*): STIPULATION AUTHORIZING THE CONTINUED USE OF CASH COLLATERAL 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 (*date*) 1/30/2026, 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: Michael F Chekian on behalf of Creditor GB Gold and Diamonds, LP  
mike@cheklaw.com, chekianmr84018@notify.bestcase.com

Abram Feuerstein, esq on behalf of U.S. Trustee United States Trustee (RS)  
abram.s.feuerstein@usdoj.gov

Everett L Green on behalf of U.S. Trustee United States Trustee (RS)  
everett.green@squirepb.com

Jisoo Hwang on behalf of Plaintiff Bj Gold, Inc.  
jhwanglaw@yahoo.com

Christian T Kim on behalf of Interested Party D and B Jewelry  
ckim@dumas-law.com, ckim@ecf.inforuptcy.com

Ali Matin on behalf of U.S. Trustee United States Trustee (RS)  
ali.matin@usdoj.gov

Alan I Nahmias on behalf of Interested Party On Ramp Funds, Inc.  
anahmias@mbn.law, jdale@mbn.law

Abel Ortiz on behalf of Attorney Abel Ortiz, Esq.  
Abel.ortiz@kts-law.com, danielle.pratali@kts-law.com

Leonard Pena on behalf of Debtor AB and J Jewelry  
lpena@penalaw.com, penasomaecf@gmail.com;penalr72746@notify.bestcase.com

Jeremy H Rothstein on behalf of Interested Party Courtesy NEF  
jrothstein@gblawllp.com, msingleman@gblawllp.com;mbowes@gblawllp.com

United States Trustee (RS)  
ustprejon16.rs.ecf@usdoj.gov

Service information continued on attached page

### **2. SERVED BY UNITED STATES MAIL:**

On (*date*) 1/30/2026, 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.

---

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Hon. Scott H. Yun  
United States Bankruptcy Court  
3420 Twelfth Street, Suite 345 / Courtroom 302  
Riverside, CA 92501-3819

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) \_\_\_\_\_, 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.

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.

1/30/2026

*Date*

NOEMI SANDOVAL

*Printed Name*

/S/ NOEMI SANDOVAL

*Signature*