

Attorney or Party Name, Address, Telephone & FAX Numbers, and California State Bar Number Roquemoore, Pringle & Moore, Inc. Julie L. Pezhman, SBN 195862 6055 East Washington Boulevard, Suite 608 Los Angeles, CA 90040-2466 Attorneys for Chapter 7 Trustee, John P. Pringle Tel. (323) 724-3117 Fax (323) 724-5410	FOR COURT USE ONLY <div style="border: 2px solid black; padding: 10px; text-align: center;"> FILED OCT 13 2006 <small>CLERK, U.S. BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA Deputy Clerk</small> </div> CASE NO: SV98-15561 GM Debtor(s)
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA	
In re: KAVEH LAHIJANI	

NOTICE OF SALE OF ESTATE PROPERTY

Sale Date: November 8, 2006	Time: 10:00 a.m.
Location: Courtroom 303, U.S. Bankruptcy Court, 21041 Burbank Blvd., Woodland Hills, CA	

Type of Sale: Public: Private: Last date to file objections: October 25, 2006

Description of Property to be Sold: All Assets of the Bankruptcy Estate to Purchaser Micha Mottale for \$3,500,000, subject to overbid. See Definition of Assets, Claims and Properties attached hereto.

Terms and Conditions of Sale: The property to be sold shall include any and all Assets of the Estate whether real, personal or otherwise including but not limited to all Assets, Claims and Property of the Estate or as more specifically described in the Notice of Motion to Sell All Assets of the Estate Subject to Overbid which is available on file with this Court. The sale will take subject to the pending appeals, District Court Case Nos. CV06-01174JFW and CV06-02117JFW, Court of Appeals Ninth Circuit Case No. 05-55806. Additionally, the Assets are being sold "as is," without any representations or warranties, subject to liens, property taxes and encumbrances of record.

Proposed Sale Price: \$3,500,000

Overbid Procedure (If Any): PLEASE SEE ATTACHED SHEET "PROPOSED BIDDING PROCEDURES."

If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:

Contact Person for Potential Bidders (include name, address, telephone, fax and/or e-mail address):
Julie L. Pezhman, Esq. email: jpezhman@rpmlaw.com
ROQUEMORE, PRINGLE & MOORE, INC.
6055 East Washington Boulevard, Suite 608
Los Angeles, CA 90040-2466
Tel. (323) 724-3117 x 355; Fax (323) 724-5410

Date: October, 2006

PROPOSED BIDDING PROCEDURES

1. Qualification of Bidders. Competing bids may only be made by Qualified Bidders for the Assets of the Estate. A "Qualified Bidder" means a bidder that has:
 - a. Presented to the Trustee at or before the time of the sale hearing evidence satisfactory to the Trustee of the potential bidder's financial ability to consummate the purchase of the assets and perform the obligations assumed in connection with such purchase; and
 - b. Delivered to the Trustee at the time of the hearing, a certified bank check or cashier's check, in the amount of \$500,000, payable to the order of John P. Pringle, Chapter 7 Trustee, to be held by the Trustee (the "Good Faith Deposit").
2. Qualification of Bids. A Qualified Bid (i) may include a letter of credit financing from an approved institution for the balance of the overbid, and (ii) must expressly remain open until two weeks after entry of the Bankruptcy Court Order Approving the Sale.
3. Initial Overbids. The initial competing offer for the Assets must be in cash or cash equivalent made payable to John P. Pringle, Chapter 7 Trustee and for aggregate compensation of at least \$50,000 more than the purchase price of \$3,500,000.
4. Subsequent Overbids. After the initial competing offer, each subsequent offer made at the sale hearing for the Assets must exceed the immediately preceding offer by no less than \$50,000 in cash or cash equivalent.

DEFINITIONS

1. **Assets** – All Assets of the Estate which includes any and all Claims and Property (as hereafter defined) of the Estate, including, but not limited to, the following: (a) the State Court Claims, any fraudulent conveyance Claims, or fraudulent transfer Claims (under any laws, whether Bankruptcy, Federal or state laws), any preference Claims (under any law, whether Bankruptcy, Federal or state), Claims for turnover of any property (real, personal, tangible, intangible or otherwise), alter ego claims, or conversion claims, all rights and Claims of the Estate to bring a substantive consolidation motion or action and (b) any and all Claims, including, but not limited to any Claims, against any of the following persons or entities and their respective Affiliates, (as hereafter defined): (i) Kamiar Simantob, (ii) Kamran Simantob, (iii) Nasser Lahijani, (iv) Said Lahijani, (v) Daniel Saraf, (vi) Arnaldo Davalos, (vii) Kamran Raminfard, (viii) Titan, an entity, (ix) SILA, an entity, (x) First Street Corp., a California corporation, (xi) Vallecitos Center, an entity, (xii) Avanti Imports Inc., a California Corporation, (xiii) Selene Jewlery, an entity, (xiv) L&L Jewlery, an entity, (xv) L&L+1 Jewlery, an entity, (xvi) Oromex Jewelry, an entity and (xvii) any other Jewlery and or Real Estate entity owned or operated by Kamiar Simantob, Kamran Simantob and/or Nasser Lahijani; excluding, however, the Claims of the Estate against the Released Parties, as set forth in the Agreement

2. **Claims** - which includes any and all claims or demands of whatsoever nature, kind or description, including without limiting the generality of the foregoing, all manner of proceedings (including but not limited to all judicial proceedings and administrative proceedings), obligations, liabilities (including strict liability), demands, claim for relief, right to payment, losses, penalties, fines, actions, disputes, causes of action, suits, claims, cross-claims, counterclaims, third-party claims, administrative claims, encumbrances, debts, dues, sums of money, costs or expenses, accounts, bonds, bills, leases, contracts, specialties, controversies, liens, subordinations,

agreements, covenants, promises, variances, trespasses, damages, judgments, extents, executions, and liabilities, whether present or future, whether known or unknown, whether suspected or unsuspected, whether foreseeable or unforeseeable, whether liquidated or unliquidated, whether choate or inchoate, whether matured or unmatured, contingent or otherwise, fixed, secured or unsecured, disputed or undisputed, whether direct, indirect, or unsecured, and whether or not the same are based upon breach of contract or any lease, tort, piercing or alter ego theories, breach of any duty, professional liability, breach of trust or participation in any such breach of trust, or otherwise in admiralty, equity or bankruptcy, including, without limitation, reasonable attorneys' fees and disbursements and consultants' fees, and costs and expenses of investigation and defense of any claim, whether or not such claim is ultimately defeated. The term "Claims" shall also include, but not be limited to, any claims for fraud, misrepresentation (intentional, negligent or otherwise), all claims under 11 U.S.C. Sections 541-551, fraudulent conveyance, fraudulent transfers (under any laws, whether Bankruptcy, Federal or state laws) (including, but not limited to any fraudulent transfers or conveyance relating to the property located at 1514 S. Vermont Avenue, Los Angeles, California 90006 ("Venice & Vermont"), 1734 W. First Street in Santa Ana, California 92703 ("First & Raitt"), 200-210 West First Street, Santa Ana, California 92701 ("First & Broadway"), 1055 West First Street, Santa Ana, California 92703 ("First & Sheldon")), preferential transfers (under any laws, whether Bankruptcy, Federal or state laws), turnover of any property (real, personal, tangible, intangible or otherwise), alter ego, conversion, embezzlement, larceny, breach of fiduciary duty, defalcation (including while in the capacity of a fiduciary or otherwise), fraudulent concealment, conspiracy, conspiracy to defraud, or indemnity.

3. **Property** - shall mean all tangible or intangible property, right, title and interest of the Trustee in any way related to, arising out or, in connection with or under the Estate, including, but not limited to, real property (including, but not limited to, the

630 Vista Lane, Laguna Beach, California 92651, 1380 Moorea Way, Laguna Beach, California 92651 and the 1000 Flamingo Road, Laguna Beach, California 92651), personal property, licenses, permits, contracts, or otherwise, excluding the Sale Proceeds or other cash or cash equivalents of the Estate.