

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Jaurigue Law Group Michael J. Jaurigue, SBN 208123 Nam H. Le, SBN 254718 114 N. Brand Blvd., Suite 200 Glendale, CA 91203 Tel: 818.630.7280 Fax: 888.879.1697 michael@jlglawyers.com nam@jlglawyers.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Rolando and Ivonne Verdecia</p>	<p>FOR COURT USE ONLY</p>
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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

<p>In re:</p> <p>ROLANDO VERDECIA and IVONNE VERDECIA,</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 2:14-bk-11423-NB CHAPTER: 11</p> <p style="text-align: center;">NOTICE OF SALE OF ESTATE PROPERTY</p>
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<p>Sale Date: 01/13/2015</p>	<p>Time: 11:00 am</p>
<p>Location: Courtroom 1545, U.S. Bankruptcy Court, 255 E. Temple St., Los Angeles, CA 90012</p>	

Type of Sale: Public Private **Last date to file objections:** 12/31/2014

Description of property to be sold: 50% interest in 25540 Via Jardin, Santa Clarita, CA 91355
Lot 54 of Tract No. 33889, In the City of Santa Clarita, County of Los Angeles, State of California, as per map recorded in Book 899, Page(s) 57 to 68 inclusive of Maps, in the Office of the County Recorder of Said County
APN: 2860-002-007

Terms and conditions of sale: See Exhibit A - Notice of Motion for Sale

Proposed sale price: \$ 237,500.00

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

Overbid procedure (if any): See Exhibit A - Notice of Motion for Sale

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

Date: 1/13/2015

Time: 11:00 a.m.

Location: Courtroom 1545, U.S. Bankruptcy Court, 255 E. Temple St., Los Angeles, CA 90012

Contact person for potential bidders (include name, address, telephone, fax and/or email address):

Nam H. Le

JAURIGUE LAW GROUP

114 N. Brand Blvd, Ste #200

Glendale, CA 91203

phone: 818-630-7280

email: nam@jlglawyers.com

Date: 12/11/2014

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:
114 N. Brand Blvd., Suite 200, Glendale, CA 91203

A true and correct copy of the foregoing document entitled: **NOTICE OF SALE OF ESTATE PROPERTY** 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)* 12/11/2014, 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:

United States Trustee- ustpreion 16.la.ecf@usdoj.gov

Marian Garza Representing BMW Financial Services NA, LLC- ecfnotices@ascensioncapitalgroup.com

Robert P Goe Representing Alliance Portfolio, Private Equity Finance, Inc. and Bank Of America, N.A.kmurphy@goeforlaw.com

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* 12/11/2014, 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.

The Honorable Neil W. Bason

United States Bankruptcy Court

255 E. Temple Street, Suite 1552

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)* _____, 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.

12/11/2014

Marija Marija

Date

Printed Name

/s/ Marija Malinovska

Signature

ADDITIONAL SERVICE INFORMATION:

Dare Law Representing United States Trustee (LA)- dare.law@usdoj.gov
Ernie Zachary Park Representing Regency centers, LP- ernie.park@bewleylaw.com
Gilbert R Yabes Representing Bank Of America, N.A.- chl1ecf@piteduncan.com
Matthew R Clarc Representing Bank Of America, N.A.- chl1ecf@piteduncan.com

ADDITIONAL SERVICE INFORMATION:

Dare Law
Office of the United States Trustee
915 Wilshire Blvd.
Suite 1850
Los Angeles, CA 90017

BMW Financial Services NA, LLC
P.O. Box 3608
Dublin, OH 43016
(Proof of Claim)

Accord Credit Services
c/o AT&T
PO BOX 10002
Newnan, GA 30271

Cavalry SPV I, LLC
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595
(Proof of Claim)

ACN
1000 Progress Place
Concord, NC 28025

California Business Bu (Original Credito
1711 S Mountain Ave
Monrovia, CA 91016

Alliance Portfolio, Private Equity Financing
c/o Goe & Forsythe, LLP
18101 Von Karman Avenue, Suite 510
Irvine, CA 92612
(Proof of Claim)

BMW Financial Services NA, LLC
P.O. Box 3608
Dublin, OH 43016
(Proof of Claim)

American Collection Systems, Inc.
PO BOX 29117
Columbus, OH 43229

Cb/Vicsert
Po Box 182789
Columbus, OH 43218

Asset Resources (Original Creditor:Prote
Po Box 48747
Coon Rapids, MN 55448

Cba Collection Burea (Original Creditor:
25954 Eden Landing Road
Hayward, CA 94545-3816

BANK OF AMERICA, N.A.
Pite Duncan, LLP
4375 Jutland Drive, Suite 200,
P.O. Box 17933
San Diego, CA 92177-0933
(Proof of Claim)

Chase Bank, N.A.
Attn: Officer
201 North Walnut Street
Wilmington, DE 19801
(FDIC) - Via Certified Mail

Bank of America, N.A.
Attn: Officer
100 N. Tryon St.
Charlotte, NC 28202
(FDIC) - Via Certified Mail

Citi Corp Trust Bank
Law Offices of Michael K. Sipes
9381 East Stockton Blvd., Ste 116
Elk Grove, CA 95624

Bewley, Lassleben & Miller, LLP.
c/o Regency Centers, L.P.
13215 East Penn Street
Whittier, CA 90602

Cmre Financial Svcs In (Original Credito
3075 E Imperial Hwy Ste
Brea, CA 92821

Com Serv Grp (Original Creditor:12 North
11603 Shelbyville Suite 3
Louisville, KY 40243

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

Continental Commercial Group
c/o Sysco Food Svcs of Ventura Inc.
317 S. Brand Blvd
Glendale, CA 91204

Law Offices of Ed Overcam
c/o Citi Corp Trust Bankam
37 Villa Rd #507
Greenville, SC 29615

CRF Solutions
2051 Royal Avenue
Simi Valley, CA 93065

LC System Inc.
444 Highway 96 East
PO BOX 64437

David F. Levine, D.D.S., Inc.
3808 Riverside Dr., Ste 305
Burbank, CA 91505

LTD Financial Services, L.P.
7322 Southwest Freeway, Suite 1600
Houston, TX 77074

DTT Surveillance
1755 N. Main Street
Los Angeles, CA 90031

Modern Adjustment Bureau
6226 Vineland Ave
North Hollywood, CA 91606

Fidelity Creditor Svc (Original Creditor)
216 S Louise St
Glendale, CA 91205

NC Financial Systems, Inc.
507 Prudential Road
Horsham, PA 19044

Financial Credit Network, Inc.
c/o Southern California Gas
PO BOX 3084
Visalia, CA 93278

NCO Financial Systems, Inc.
c/o Bank of America, N.A.
507 Prudential Road
Horsham, PA 19044

Firstsource Advantage, LLC.
c/o Bank of America, N.A.
205 Bryant Woods South
Buffalo, NY 14228

Newport Meat Company
16691 Hale Ave.
Irvine, CA 92606

Gecrb/Empire Home Srvc
Po Box 981439
El Paso, TX 79998

Receivables Manageme (Original Creditor:
1814 North Michigan
Saginaw, MI 48602

IC System Inc.
444 Highway 96 East
Saint Paul, MN 55164

Resort Recov (Original Creditor:01 Unive
2535 Camino Del Ri #130
San Diego, CA 92108

INTERNAL REVENUE SERVICE*
300 North Los Angeles Street
M/S 5022
Los Angeles, CA 90012
(Proof of Claim)

Regency Centers, LP
c/o Ernie Zachary Park
Bewley Lasseben & Miller
13215 E Penn St., Suite 510
Whittier CA 90602
(Proof of Claim)

Kohls/Capone
N56 W 17000 Ridgewood Dr
Menomonee Falls, WI 53051

Southern California Edison
c/o Torres Credit Services, Inc.
27 Fairview Street
Carlisle, PA 17015

LOS ANGELES COUNTY TREASURER
AND TAX COLLECTOR
PO BOX 54110
LOS ANGELES, CA 90054-0110
(Proof of Claim)

Southern Wine & Spirits of America
c/o Ray Garwacki, Jr.
5111 Dahlia Drive, Suite A
Los Angeles, CA 90041

Tec Co Systems Inc.
18034 Ventura Blvd # 210

**Encino, CA 91316
(Proof of Claim)**

The Lotus Agency
c/o ASC Security Systems
6311 Van Nuys Blvd., Ste 478
Van Nuys, CA 91401

Torres Credit Services, Inc.
c/o Southern California Edison
27 Fairview Street
Carlisle, PA 17015

Treasurer and Tax Collector
225 North Hill Street
Los Angeles, CA 90012

Us Bank/Na Nd
4325 17th Ave S
Fargo, ND 58125

**Wells Fargo Bank, N.A.
435 Ford Road, Suite 300
St. Louis Park, MN 55426-1063
(Proof of Claim)**

Wells Fargo Bank, N.A.
Attn: Officer
101 N. Phillips Avenue
Sioux Falls, SD 57104
(FDIC) - *Via Certified Mail*

Westside Recovery Svcs (Original Credito
6200 Wilshire Blvd Ste 1
Los Angeles, CA 90048

Youngs Market Compnay, LLC
c/o CRF Solutions
2051 Royal Avenue
Simi Valley, CA 93065

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Department Stores National Bank/Macy's
Bankruptcy Processing
Po Box 8053
Mason, OH 45040

Capital One, N.A.
c o Becket and Lee LLP
POB 3001
Malvern, PA 19355-0701

Capital One Bnak N.A.
Attn.: Officer
4851 Cox Road
Glen Allen, VA 23060
(FDIC)- *Via Certified Mail*

Southern CA Edison Company
Attn: credit and payment services
1551 W San Bernardino Rd.
Covina, CA 91722

EXHIBIT “A”

1 J AURIGUE LAW GROUP
2 MICHAEL J. JAURIGUE, SBN 208123
3 Nam H. Le, SBN 260752
4 114 North Brand Blvd., Ste #200
5 Glendale, California, 91203
6 Telephone: (818) 630-7280
7 Facsimile: (888) 879-1697
8 michael@jlglawyers.com
9 nam@jlglawyers.com

10 Attorneys for Rolando and Ivonne Verdecia,
11 Debtors and Debtors-in-Possession

12 UNITED STATES BANKRUPTCY COURT
13 CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

14 IN RE:

15 ROLANDO VERDECIA and IVONNE
16 VERDECIA,

17 Debtors and Debtors-in-Possession.

Case No.: **2:14-bk-11423-NB**

Chapter 11

**NOTICE OF DEBTORS-IN-
POSSESSION'S MOTION FOR
ORDER AUTHORIZING SALE OF
50% INTEREST IN REAL PROPERTY
LOCATED AT 25540 VIA JARDIN,
SANTA CLARITA, CA 91355, AND
APPROVING OVERBIDDING
PROCEDURES**

[11 U.S.C. § 363(b), 11 U.S.C. §363(f)]

Hearing on Sale:

Date: January 13, 2015

Time: 11:00 a.m.

Courtroom: 1545

United States Bankruptcy Court

255 E. Temple Street

Los Angeles, CA 90012

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1 **TO THE HONORABLE NEIL BASON, UNITED STATES BANKRUPTCY**
2 **JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE; AND ALL**
3 **PARTIES IN INTEREST:**

4 **PLEASE TAKE NOTICE THAT** on January 13, 2015, at 11:00 a.m., a hearing
5 will be held before the Honorable Neil Bason in Courtroom 1545 of the United States
6 Bankruptcy Court located at 255 E. Temple Street, Los Angeles, California, to consider the
7 motion of the Debtors and Debtors-in-Possession Rolando and Ivonne Verdecia (the
8 “DIPs”) for an order authorizing the sale of a 50% interest in real property located at
9 25540 Via Jardin, Santa Clarita, CA 91355 (the “Property”) and approving overbid
10 procedures (the “Motion”).

11 The DIPs seek an order of this Court authorizing the sale of the Property free and
12 clear of liens to Maria Delpilar Sanchez (“Purchaser”) for \$237,500.00, an amount
13 equaling 50% of the fair market value of the Property. The DIPs will not employ a real
14 estate broker, and there will be no broker fees in connection with the proposed sale. The
15 sale of the Property to the Purchasers is subject to the approval of this Court.

16 The DIPs base the Motion upon 11 U.S.C. Section 363(b), Rules 2002 and 6004 of
17 the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rule 6004-1. The
18 Motion is also based upon this Notice of Motion, the Memorandum of Points and
19 Authorities, the Declaration of Rolando Verdecia, and such oral and documentary evidence
20 that may be presented at or prior to the hearing on the Motion. In the Motion, the DIPs
21 request that the Court enter an order:

- 22 1. Authorizing the DIPs to sell the estate’s 50% interest in the Property, free
23 and clear of liens, claims, encumbrances, and interests pursuant to 11
24 U.S.C. § 363(f), to Purchaser for the Sale Price of \$237,500, or to a
25 qualified over-bidder, who may be the Purchaser, for the amount of the
26 successful overbid;

- 1 2. That Purchaser or successful over-bidder be designated a good faith
2 purchaser pursuant to 11 U.S.C. § 363(m);
- 3 3. Authorizing the DIPs to take all actions to conclude the sale of the
4 Property to the Purchaser, or a successful over bidder, without returning
5 to this Court with further orders;
- 6 4. Authorizing the DIPs to handle the proceeds from the sale of the Property
7 as follows: payment of loan broker expenses, payment of ordinary selling
8 expenses, including escrow and transfer fees but excluding broker's
9 commissions, payment of any unpaid property taxes, withholding of any
10 sales taxes, and the payment of the balances due to Alliance Portfolio
11 pursuant to the terms of the sale; and
- 12 5. That the Court enter such other and further relief in favor of the DIPs as
13 is appropriate under the circumstances of this case.

14 Terms of Sale

15 The sale of the Property is on an “as is” basis. The DIPs make no warranty or
16 representations of any kind as to the condition of the Property. The DIPs and the
17 Purchaser (or successful overbidder) agree that the DIPs will not make any repairs,
18 preventative or otherwise to the Property and that the sale is necessarily subject to an
19 overbid process. There will be no broker's commissions for the sale of the Property.

20
21 Overbidding Procedures

22 The DIPs have established the following overbid procedures (the “Overbid
23 Procedures”) regarding the sale of the Property, and hereby give notice to parties in
24 interest regarding the Overbid Procedures, which are as follows:

- 25 1. Minimum Overbids. The minimum opening overbid will be \$10,000.00 over the
26 Sale Price. Any subsequent overbids shall be at least \$5,000.00 over the
27 preceding offer.

- 1 2. Minimum Deposits. The minimum deposit will be 30 percent of the Sale Price,
2 or \$71,250. This deposit shall be by cashier's check payable to "Jaurigue Law
3 Group Client Trust Account," and remitted to Michael J. Jaurigue, Jaurigue Law
4 Group, 114 N. Brand Ave., Suite 200, Glendale, California 91203. The deposit
5 must accompany any overbid offer for the Property with evidence of the ability
6 to close the transaction. In the event an approved buyer does not close the
7 transaction, the deposit will be non-refundable if the overbid is accepted and the
8 sale does not close within fourteen (14) days of the date on which the Order
9 approving the sale of the Property is entered by the Court.
- 10 3. The proponent of each overbid must submit, not later than twenty-four hours
11 prior to the date and time of the hearing on the sale, a cashier's check for the
12 minimum deposit as calculated above, and evidence of the financial ability to
13 close escrow within fourteen (14) days of submission of the overbid. This
14 evidence must at a minimum include a demonstration of a firm financing
15 commitment from a recognized lender and/or sufficient, accessible liquid funds.
- 16 4. Any qualified over-bidders will be allowed to overbid at the hearing. Any
17 qualified over-bidders must provide for payment of the entire Sale Price at the
18 close of escrow.
- 19 5. Qualified over-bidders must offer to purchase the Property on an "as is" basis,
20 and shall contain no conditions or contingencies in addition to those terms
21 agreed upon between the DIPs and the buyer.
- 22 6. At the conclusion of the hearing on the Motion, the Court shall determine the
23 highest offer for the Property, and the DIPs shall conclude the sale of the
24 Property to the Purchaser, or a successful over bidder, without returning to this
25 Court for further orders.
- 26 7. The over-bidder's minimum deposit is non-refundable in the event that the
27 Court confirms the sale but the over-bidder fails to timely close the sale. The
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1 over-bidder will be bound by the proposed purchase and sale agreement that the
2 DIPs will file with the Court, except as to price.

3 8. The DIPs propose that the Court shall confirm a backup buyer whereby, in the
4 event that the buyer does not close within fourteen (14) days after entry of the
5 Order authorizing the sale, the DIPs may sell the Property to the backup buyer
6 for the amount of the backup buyer's last bid.

7 9. The DIPs also request that the Court rule that the Purchaser or successful over-
8 bidder be designated a good faith purchaser pursuant to 11 U.S.C. § 363(m)
9 once sale of the Property to such party is confirmed.

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11 Dated: December 11, 2015

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/s/ Nam H. Le _____

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Nam H. Le,
JAURIGUE LAW GROUP
Attorneys for the Debtors and Debtors-in-
Possession, Rolando and Ivonne Verdecia

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