

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Fritz J. Firman 117011 Weber Firman 1503 South Coast Drive Suite 209 Costa Mesa, CA 92626 Tel: (714) 433-7185 Fax: (714) 662-0302 Firmanweber@gmail.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Oscar Rene Novoa and Sylvia Novoa</p>	<p>FOR COURT USE ONLY</p>
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</p>	
<p>In re: Enramada Properties, LLC.,</p> <hr/> <p>Oscar Rene Novoa Sylvia Novoa,</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 2:19-bk-19869 WB CHAPTER: 11</p> <p style="text-align: center;">NOTICE OF SALE OF ESTATE PROPERTY</p>
<p>Sale Date: 10/13/2022 Time: 10:00 am</p> <p>Location: Royball Federal Building 255 E. Temple Ste. E Courtroom 1375</p>	

Type of Sale: Public Private **Last date to file objections:** 09/29/2022

Description of property to be sold:

2714 Lanfranco Street, Los Angeles, CA 9003-4427 Real Property in the County of Los Angeles, State of California Lot 5 of black subdivision in the City of Los Angeles, County of Los Angeles, State of California as per map recorded in book 2 page 52 of maps in the office in the County recorder of said County. APN: 5185-017-009

Terms and conditions of sale:

Subject to Court approval, Debtor proposes to sell the Lanfranco Property to Buyer for \$720,000. An executed California Residential Purchase Agreement and Joint Escrow Instructions and Buyer Counter Offer No. 1 (collectively "Purchase Agreement") is attached hereto as Exhibit "A." Buyer will deposit \$21,600 in escrow.

The Purchase Agreement provides in part:

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

- a. Buyers acknowledge that it is buying the Lanfranco Property "as is" and "where is" without warranted of any kind, express or implied, being given by the Debtor, its agents concerning the Property's condition;
- b. Buyer is aware the Offer is contingent upon Bankruptcy Court approval
- c. There are no contingencies to this transaction;
- d. Any and all disputes which involve in any manner the bankruptcy estate or the Trustee arising from the Purchase Agreement shall be resolved only in the United States Bankruptcy Court.

Proposed sale price: \$720,000

Overbid procedure (if any):

In order to obtain the highest and best offer for the benefit of the estate's creditors, the Debtor proposes that the offer be subject to overbid. Notice is being provided of the opportunity for overbidding to all interested parties.

Debtor requests that the Court approve the following overbid procedure:

- a. Only qualified bidders may submit an overbid. A "qualified bidder" is one who provides a financial statement and such business and banking references as are required in the Debtor's reasonable discretion, sufficient to assure Debtor of the bidder's ability (based on availability of financing, experience or other conditions) to consummate the purchase of the Lanfranco Property, and who can consummate the purchase of the Lanfranco Property on the same terms and conditions, other than price, as those proposed in the Offer.
- b. Each bid must be received by the Debtor and Debtor's counsel no later than three (3) business days prior to the hearing on this motion. The Debtor has discretion to shorten the deadline to submit overbids.
- c. The initial overbid must exceed the original Offer by a minimum of Five Thousand U.S. dollars (\$5,000). Each subsequent bid must then be in increments of at least Two Thousand five hundred U.S. dollars (\$2,500).
- d. Each bid must be all cash, non-contingent, and on the same terms and conditions, other than price, as those proposed in the Offer.
- e. Each bidder must match all terms and conditions of the original bid. Thus, an "earnest money" deposit of at least \$10,000 must be made. The deposit must be received by the Debtor no later than three (3) business days prior to the hearing on this motion. The deposit must be in cash, cashier's check, certified check or irrevocable letter of credit, and must be deposited with Debtor so that Debtor will have access to the funds no later than three (3) business days prior to the hearing on this motion.
- f. Should a bidder fail to qualify for financing or timely close escrow, the \$10,000 deposit is non-refundable. The procedures will provide for an orderly completion of the sale of the Greensward Property by permitting all bidders to compete on similar terms and will allow interested parties and the Court to compare competing bids in order to realize the highest benefit for the estate.

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 email address):

Andrew Bisom Attorney for Enramada
The Bisom Law Group
300 Spectrum Center Dr. Ste. 1575
Irvine, CA 92618
Tel: (714) 643-8900
Facsimile: (714) 643-8901
Abisom@bisomlaw.com

Fritz J. Firman
Weber Firman
1503 South Coast Drive, Suite 209
Costa Mesa, CA 92626
Tel: (714) 433-7185
Facsimile: (714) 643-8901
Firmanweber@gmail.com

Date: 09/22/2022

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:
1503 South Coast Drive
Suite 209
Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*): 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*) 09/22/2022, 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:

- US Trustee- ustpregion16.la.ecf@usdoj.gov
- Andrew Bisom- abisom@bisomlaw.com
- Bennett Rheingold- balanrh@aol.com
- Dare Law- dare.law@usdoj.gov
- David Lally- davidlallylaw@gmail.com
- Glenn Ward Calsada- glenn@calsadalaw.com
- Glenn C. Kelble- glenn@ksgklaw.com
- Karen A. Ragland- Karen.ragland@fnf.com
- Paul M. Kelley- pkelley@kelleysemmel.com
- Lazaro E. Fernandez- lef17@pacbell.net
- Daniel K. Fujimoto- wdk@wolffirm.com
- Crystle Jane Lindsey- crystle@wsrlaw.net
- Erin M. McCartney- bankruptcy@zbslaw.com
- Tom Roddy Normandin- tnormandin@pnbd.com
- James R. Selth- jim@wsrlaw.net
- Nathan F. Smith- nathan@mclaw.org
- Valerie Smith- claims@recoverycorp.com
- Alan Wolf- wdk@wolffirm.com

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) , 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.

Service information continued on attached page

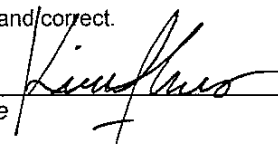
3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those 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.

09/22/22
Date

Kimberly Flores
Printed Name


Signature

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