

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Peter J. Mastan, Trustee peter.mastan@dinsmore.com 550 S. Hope St., Suite 1765 Los Angeles, CA 90071 Telephone: (213) 335-7739</p> <p>Ch. 7 Trustee of Bankruptcy Estate of Anna Belle Ebert</p> <p><input type="checkbox"/> Individual appearing without attorney <input type="checkbox"/> Attorney for:</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 style="text-align: center;">ANNA BELLE EBERT,</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 2:20-bk-14892-SK CHAPTER: 7</p> <p style="text-align: center;">NOTICE OF SALE OF ESTATE PROPERTY</p>
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<p>Sale Date: 07/28/2021</p>	<p>Time: 9:00 am</p>
<p>Location: Courtroom 1575, 255 E. Temple St., Los Angeles, CA 90012,</p>	

Type of Sale: Public Private **Last date to file objections:** 07/14/2021

Description of property to be sold:
Gas and Oil Royalty Stream

Terms and conditions of sale:
"AS IS" and "WHERE IS" basis, subject to all existing encumbrances, liens, claims, and restrictions thereon, if any.

Proposed sale price: \$ 20,000.00

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): Initial bid must be at least \$20,000.00 (the amount being paid by Purchaser plus \$2,000.00
Subsequent bids must be at least \$500 higher than the initial bid.

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):

Peter J. Mastan, Trustee
550 S. Hope St., Suite 1765
Los Angeles, CA 90071
(213) 335-7739
travis.terry@dinsmore.com

Date: 07/02/2021

1 Peter J. Mastan, Trustee
travis.terry@dinsmore.com
2 550 Hope St., Suite 1765
Los Angeles, California 90071
3 Telephone: 213-335-7737

4 Chapter 7 Trustee of the Bankruptcy Estate
of Anne Belle Ebert
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8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **LOS ANGELES DIVISION**

11 In re:

12
13 ANNE BELL EBERT,

14 Debtor(s).
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Case No. 2:20-bk-14892-SK

Chapter 7

**NOTICE OF FILING OF MOTION TO
APPROVE ASSIGNMENT
AGREEMENT BETWEEN THE
TRUSTEE AND STRUCTURED
ASSET SALES, LLC FOR THE
TRUSTEE'S CONVEYANCE OF THE
ESTATE'S INTEREST IN A CERTAIN
GAS AND OIL ROYALTY STREAM**

19 Date: July 28, 2021
20 Time: 9:00 a.m.
Ctrm: Courtroom 1575
255 E. Temple Street
Los Angeles, CA 90012
21 Judge: Hon. Sandra R. Klein
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1 **TO THE HONORABLE SANDRA KLEIN, UNITED STATES BANKRUPTCY JUDGE,**
2 **THE DEBTOR, THE OFFICE OF THE UNITED STATES TRUSTEE, ALL SCHEDULED**
3 **CREDITORS OF THE ESTATE, ALL OTHER INTERESTED PARTIES; AND THEIR**
4 **RESPECTIVE COUNSEL OF RECORD, IF ANY:**

5 **NOTICE IS HEREBY GIVEN** that, on July 28, 2021, on the 9:00 a.m. calendar, in
6 Courtroom 1575 of the United States Bankruptcy Court located at 255 E. Temple Street, Los
7 Angeles, California 90012, the Honorable Sandra R. Klein, United States Bankruptcy Judge, will
8 conduct a hearing on the “Motion to Approve Assignment Agreement between the Trustee and
9 Structured Asset Sales, LLC for the Trustee’s Conveyance of the Estate’s Interest in a Certain Gas
10 and Oil Royalty Stream” (the “Motion”) filed by Peter J. Mastan, Chapter 7 trustee (the “Trustee”)
11 of the bankruptcy estate (the “Estate” of Anna Belle Ebert (the “Debtor”). Through the Motion,
12 the Trustee seeks an order that does each of the following:

13 (1) Approves the Assignment Agreement (the “Agreement”) attached as **Exhibit 1**.

14 (2) Authorizes the Trustee to make the assignment of the Estate’s interest in the
15 scheduled oil and gas royalties (the “Royalties”) and determines that the assignment is made on an
16 “AS IS” and “WHERE IS” basis, subject to all existing encumbrances, liens, claims and
17 restrictions thereon, if any.

18 (3) Determines that the Agreement was made in good faith in an arm’s-length
19 transaction and that the assignee of the Estate’s interest in the Royalties (whether Structured Asset
20 Sales, LLC (“Purchaser”), or a successful overbidder) is acting in good faith within the meaning of
21 11 U.S.C. § 363(m).

22 (4) Determines that adequate notice of the Motion was given.

23 (5) Authorizes the Trustee to perform the terms of the Agreement and to sign all such
24 documents that are reasonably necessary to perform the Trustee’s obligations under the
25 Agreement.

26 (6) Reserves Bankruptcy Court jurisdiction to enforce the Agreement.

27 (7) Approves the following overbid procedure:

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1 **(a)** any initial overbid for an assignment of the Estate’s interest in the Royalties
2 must be in an amount at least \$2,000 greater than the amount to be paid by Purchaser under the
3 Agreement (i.e., in an amount not less than \$20,000.00);

4 **(b)** in the event that the Trustee receives multiple overbids, any subsequent
5 overbids must be made in Court at the time of the hearing on the Motion and must be made in
6 minimum increments of \$500;

7 **(c)** any overbid must be accompanied by a certified or cashier’s check in the
8 full amount of that bid and the successful overbidder must pay to the Trustee by certified or
9 cashier’s check the full purchase price at the time of the hearing on the Motion;

10 **(d)** any sale at overbid will be all cash “AS IS,” “WHERE IS,” subject to all
11 claims, liens, encumbrances, and other interests, with all faults and without any representation or
12 warranty whatsoever, whether express or implied, including without limitation, without warranty
13 as to functionality, merchantability, or fitness for a particular purpose and;

14 **(e)** the Trustee may exercise his discretion to reject a particular overbid that is
15 not both higher and better (based upon all of the circumstances) than Purchaser’s offer or the offer
16 of other overbidders.

17 **(f)** any person making an overbid for the Royalties shall be deemed to have
18 made, on his/her/its own account, each of the representations made by Purchaser to the Trustee as
19 set forth in Paragraph 6 of the Agreement.

20 **(8)** Authorizes the Trustee to close the proposed assignment of the Estate’s interest in
21 the Royalties to Purchaser (or the successful overbidder) unless an appeal of the order authorizing
22 that sale is timely filed and a stay pending appeal is entered.

23 **(9)** Authorizes the Trustee to pay Purchaser a \$1,000 break-up fee if the purchase of
24 the Royalties does not close with Purchaser but closes with another overbidder, or if another
25 overbidder is the successful bidder but the assignment of the Royalties does not close with such
26 other bidder and such other bidder’s deposit (or portion thereof) is forfeited.

27 **(10)** Waives the 14-day stay of orders for the disposition of Estate property set forth in
28 Fed.R.Bankr.P. 6004(h).

1 **NOTICE IS FURTHER GIVEN** that the Motion is made pursuant to 11 U.S.C.
2 §§ 363(b) and 363(m), Federal Rules of Bankruptcy Procedure 2002 and 6004, and Local
3 Bankruptcy Rules 6004-1 and 9013-1 on the grounds that the proposed assignment is in the best
4 interest of the Estate in that it will maximize the value to unsecured creditors of the Estate's
5 interest in the Royalties.

6 **NOTICE IS FURTHER GIVEN** that the Motion is based on (a) this Notice of Filing of
7 Motion; (b) the concurrently filed Notice of Motion and Motion, Memorandum of Points and
8 Authorities, Declaration of Peter J. Mastan, and Exhibits; (c) the pleadings on file with the Court
9 of which the Court is requested to take judicial notice; and (d) such further evidence that may be
10 properly submitted prior to or at any hearing on the Motion. At your own expense, you may obtain
11 a complete copy of the Motion from the Court's file. Alternatively, you may obtain a free,
12 electronic copy of the Motion by contacting Mr. Travis Terry at travis.terry@dinsmore.com and
13 providing to Mr. Terry your email address.

14 **NOTICE IS FURTHER GIVEN** that, pursuant to Local Bankruptcy Rule 9013-1(f), any
15 opposition to the Motion must be in writing; must be filed with the Court and served upon the
16 Trustee, the Office of the United States Trustee, the Debtor, and Purchaser at the addresses set
17 forth below not later than 14 days before the hearing on the Motion; and must include a complete
18 written statement of all reasons in opposition thereto or in support or joinder thereof, declarations
19 and copies of all photographs and documentary evidence on which the responding party intends to
20 rely, and any responding memorandum of points and authorities:

21 **For Filing With the Court**

22 Clerk's Office
23 United States Bankruptcy Court
24 255 E. Temple Street, Room 940
25 Los Angeles, California 90012

26 **For Service on Sandra R. Klein, Bankruptcy Judge**

27 Hon. Sandra R. Klein
28 United States Bankruptcy Court
 Central District of California
 Edward R. Roybal Federal
 Building and Courthouse
 255 E. Temple Street, Suite 1582
 Los Angeles, CA 90012

1 **For Service on the Trustee**

2 Peter J. Mastan, Trustee
3 550 South Hope Street, Suite 1765
4 Los Angeles, California 90071-2627

5 **For Service on Office of U.S. Trustee**

6 Office of the U.S. Trustee
7 915 Wilshire Blvd., Suite 1850
8 Los Angeles, CA 90017

9 **For Service on the Debtor**

10 Anne Belle Ebert
11 37458 Butternut Ln
12 Palmdale, CA 93551-6124

13 and

14 Nicholas M. Wajda, Esq.
15 Wajda Law Group, APC
16 6167 Bristol Parkway, Suite 200
17 Culver City, CA 90230

18 **For Service on Purchaser**

19 Structured Asset Sales, LLC
20 c/o David Pullman
21 dpullman@pullmanbonds.com

22 **NOTICE IS FURTHER GIVEN** that due to the COVID-19 outbreak, Judge Klein will be
23 holding all hearings remotely until further notice. Some hearings will be held via telephone and
24 some hearings will be held via ZoomGov. The cover page for the publicly posted hearing
25 calendar will state whether the hearings that day will be held via telephone or via ZoomGov. The
26 calendar can be accessed at the web address: <http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SK>
27 (Click on the "Select Judge" tab on the upper left side of the screen and select Judge Klein). If a
28 hearing is being held via telephone, you must contact CourtCall at (866) 582-6878 at least thirty
minutes before the hearing time to schedule a telephonic appearance. If you experience any
difficulty registering with CourtCall, contact Judge Klein's chambers at 213-894-7741. If a
hearing is being held via ZoomGov, the first page of Judge Klein's publicly posted hearing
calendar will provide video and audio connection information for the hearings.

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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: 550 S. Hope Street, Suite 1765, Los Angeles, CA 90071

A true and correct copy of the foregoing document described as: **NOTICE OF FILING OF MOTION TO APPROVE ASSIGNMENT AGREEMENT BETWEEN THE TRUSTEE AND STRUCTURED ASSET SALES, LLC FOR THE TRUSTEE'S CONVEYANCE OF THE ESTATE'S INTEREST IN A CERTAIN GAS AND OIL ROYALTY STREAM** 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 indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") - Pursuant to controlling General Order(S) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 2, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses indicated below:

- **Peter J Mastan (TR)** pmastan@iq7technology.com; travis.terry@dinsmore.com; ecf.alert+Mastan@titlexi.com
- **Valerie Smith** claims@recoverycorp.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Nicholas M Wajda** info@wajdalawgroup.com, r47098@notify.bestcase.com

_____ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):

On **July 2, 2021** I served the following person(s) and/or entity(ies) at the last known address(es) 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/or with an overnight mail service 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.

UNITED STATES BANKRUPTCY COURT

Hon. Sandra R. Klein
United States Bankruptcy Court
Edward R. Roybal Federal
Building and Courthouse
255 E. Temple Street, Suite 1582
Los Angeles, CA 90012

DEBTOR(S)

Anna Bell Ebert
37458 Butternut Ln
Palmdale, CA 93551-6124

X Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **July 2, 2021** I served the following person(s) and/or entity(ies) by personal delivery, 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 mailing to the judge will be completed no later than 24 hours after the document is filed.

PURCHASER

Structured Asset Sales, LLC c/o David Pullman: dpullman@pullmanbonds.com

_____ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

July 2, 2021
Date

TRAVIS MICHAEL TERRY
Type name

/s/ Travis Michael Terry
Signature

ADDITIONAL SERVICE INFORMATION (if needed):

SERVED BY FIRST CLASS U.S. MAIL

CREDITORS AND INTERESTED PARTIES

American Express
PO Box 0001
Los Angeles, CA 90096-8000

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Bank of America
4909 Savarese Circle
F11-908-01-50
Tampa, FL 33634-2413

BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

Capital One
Attn: Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0285

Capital One
PO Box 30281
Salt Lake City, UT 84130-0281

Capital One Bank (USA), N.A.
by American InfoSource as agent
PO Box 71083
Charlotte, NC 28272-1083

Prosper Funding LLC
221 Main Street
San Francisco, CA 94105-1906

Prosper Funding LLC
221 Main Street, Suite 300
San Francisco, CA 94105-1909

Prosper Marketplace Inc.
C/O WEINSTEIN & RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

Syncb/Care Credit
Attn: Bankruptcy
PO Box 965064
Orlando, FL 32896-5064

Syncb/Care Credit
PO Box 965036
Orlando, FL 32896-0001

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk VA 23541-1021

Synchrony Bank/Sams Club
Attn: Bankruptcy Dept
PO Box 965060
Orlando, FL 32896-5060

Synchrony Bank/Sams Club
PO Box 965005
Orlando, FL 32896-5005

TD Bank, USA
by American InfoSource as agent
PO Box 248866
Oklahoma City, OK 73124-8866

Target
PO Box 673
Minneapolis, MN 55440-0673

Target
c/o Financial & Retail Svcs
Mailstop BT POB 9475
Minneapolis, MN 55440-9475

US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

US Bank/RMS CC
Cb Disputes
Saint Louis, MO 63166

Wells Fargo Bank NA
Mac F823f-02f
PO Box 10438
Des Moines, IA 50306-0438

Wells Fargo Bank NA
PO Box 5185
Sioux Falls, SD 57117-5185

Wells Fargo Bank, N.A.
Wells Fargo Education Financial Services
PO Box 10438, MAC F8235-02F
Des Moines, IA 50306-0438

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: 550 S. Hope Street, Suite 1765, Los Angeles, CA 90071

A true and correct copy of the foregoing document described as: **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 indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”) - Pursuant to controlling General Order(S) and Local Bankruptcy Rule(s) (“LBR”), the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 2, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses indicated below:

- **Peter J Mastan (TR)** pmastan@iq7technology.com; travis.terry@dinsmore.com; ecf.alert+Mastan@titlexi.com
- **Valerie Smith** claims@recoverycorp.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Nicholas M Wajda** info@wajdalawgroup.com, r47098@notify.bestcase.com

_____ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served): On **July 2, 2021** I served the following person(s) and/or entity(ies) at the last known address(es) 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/or with an overnight mail service 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.

UNITED STATES BANKRUPTCY COURT
Hon. Sandra R. Klein
United States Bankruptcy Court
Edward R. Roybal Federal
Building and Courthouse
255 E. Temple Street, Suite 1582
Los Angeles, CA 90012

DEBTOR(S)
Anna Bell Ebert
37458 Butternut Ln
Palmdale, CA 93551-6124

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PURCHASER

Structured Asset Sales, LLC c/o David Pullman: dpullman@pullmanbonds.com

_____ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

July 2, 2021
Date

TRAVIS MICHAEL TERRY
Type name

/s/ Travis Michael Terry
Signature