

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address

David M. Goodrich, State Bar No. 208675  
dgoodrich@go2.law  
GOLDEN GOODRICH LLP  
3070 Bristol Street, Suite 640  
Costa Mesa, California 92626  
Tel: 714-966-1000  
Fax: 714-966-1000

FOR COURT USE ONLY

☐ Individual appearing without attorney  
☒ Attorney for: Wesley H. Avery, Chapter 7 Trustee

In re:  
MICHAEL LEVINE, INC.,

CASE NO.: 2:21-bk-15683-WB

CHAPTER: 7

## NOTICE OF SALE OF ESTATE PROPERTY

Debtor(s).

**Sale Date:** 06/12/2025

**Time:** 2:00 pm

**Location:** United States Bankruptcy Court, Courtroom 1375, 255 E. Temple Street, Los Angeles, California 90012

**Last date to file objections: 05/29/2025**

All rights, if any, of the Michael Levine, Inc., bankruptcy estate and Michael Levine, Inc. to the following intellectual property: "Michael Levine Fabrics" and "Low Price Fabrics" as well as the Estate's rights, if any, to the 14 active domains as listed in the Debtor's bankruptcy schedules.

**Proposed sale price: \$ 35,000.00**

**Overbid procedure (*if any*):**

Not subject to overbid.

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

Sale Date: June 12, 2025, at 2:00 p.m.

Location

United States Bankruptcy Court

Central District of California, Los Angeles Division

255 E. Temple Street, Courtroom 1375

Los Angeles, CA 90012

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

N/A. Not subject to overbid.

Date: 05/22/2025

David M. Goodrich, State Bar No. 208675  
dgoodrich@go2.law

**GOLDEN GOODRICH LLP**  
3070 Bristol Street, Suite 640  
Costa Mesa, California 92626  
Telephone 714-966-1000  
Facsimile 714-966-1002

Counsel for Wesley H. Avery,  
Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

In re

MICHAEL LEVINE, INC.,

Debtor.

Case No. 2:21-bk-15683-WB

Chapter 7

**NOTICE OF HEARING ON CHAPTER 7  
TRUSTEE'S MOTION FOR ORDER:**

- (1) **AUTHORIZING SALE OF PERSONAL  
PROPERTY PURSUANT TO 11 U.S.C.  
§ 363(b);**
- (2) **APPROVING BUYER AS GOOD-  
FAITH PURCHASER PURSUANT TO  
11 U.S.C. § 363(m); AND**
- (3) **APPROVING COMPROMISE OF  
CONTROVERSY PURSUANT TO  
FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 9019**

**Hearing:**

**DATE:** June 12, 2025

**TIME:** 2:00 p.m.

**PLACE:** Courtroom 1375

Roybal Federal Building

255 E. Temple Street

Los Angeles, California 90012

**TO THE OFFICE OF THE UNITED STATES TRUSTEE; THE DEBTOR AND DEBTOR'S  
COUNSEL, IF ANY; AND PARTIES IN INTEREST:**

**PLEASE TAKE NOTICE** that on June 12, 2025, at 2:00 p.m., or as soon thereafter  
as the matter may be heard, the Court will conduct a hearing ("Hearing") in the above-  
captioned Court on a *Motion for Order: (1) Authorizing Sale of Personal Property*  
*Pursuant to 11 U.S.C. § 363(b); (2) Approving Buyer as Good-Faith Purchaser Pursuant*

MOTION

1 to 11 U.S.C. § 363(m); and (3) Approving Compromise of Controversy Pursuant to  
2 Federal Rule of Bankruptcy Procedure 9019 (“Motion”) filed by Wesley H. Avery, the duly  
3 qualified, appointed and acting Chapter 7 trustee (“Trustee”) for the bankruptcy estate  
4 (“Estate”) of Michael Levine, Inc. (“Debtor” or “MLI”).

5 **PLEASE TAKE FURTHER NOTICE** that through the Motion, the Trustee seeks an  
6 order approving the sale (“Sale”) of all rights, if any, of the MLI Estate and MLI to the  
7 following intellectual property: “Michael Levine Fabrics” and “Low Price Fabrics” as well as  
8 the Estate’s rights, if any, to the Domains as listed in the Debtor’s Schedules (together,  
9 “Assets”), pursuant to 11 U.S.C. § 363(b), on the terms and conditions stated in the written  
10 offer titled *Settlement and Sale Agreement* (“Agreement”), attached to the Motion as  
11 **Exhibit 1**, and incorporated herein by reference, to Connect Apparel, LLC, a California  
12 limited liability company (“Connect Apparel”) and Sohrab Issakharian (“Issakharian” and  
13 together with Connect Apparel, “Purchaser”), for \$35,000.00 (“Settlement”). The purchase  
14 price is also intended to serve as settlement funds for a release of the claims against  
15 Connect Apparel and Issakharian.

16 **PLEASE TAKE FURTHER NOTICE** that the Assets are being sold on an “as is,  
17 where is” basis, with no warranties, recourse, contingencies, or representations of any  
18 kind. There are no expected tax consequences from the proposed Sale of the Assets.

19 **PLEASE TAKE FURTHER NOTICE** that the Trustee also seeks an order  
20 (i) determining that the Purchaser is entitled to 11 U.S.C. § 363(m) protection; and  
21 (ii) waiving the fourteen (14) day stay prescribed by Rule 6004(h) of the Federal Rules of  
22 Bankruptcy Procedure.

23 **PLEASE TAKE FURTHER NOTICE** that the Motion is made pursuant to 11 U.S.C.  
24 § 363(b)(1) and Federal Rules of Bankruptcy Procedure 9019 and 6004. The Agreement  
25 is fair and reasonable and is a valid exercise of the Trustee’s business judgment. The  
26 Agreement was entered into in good faith and was negotiated at arms’ length.

27 **PLEASE TAKE FURTHER NOTICE** that a complete copy of the Motion is on file  
28 with the Bankruptcy Court. The Motion is based upon the Memorandum of Points and

1 Authorities, the Declarations of Wesley H. Avery and Sohrab Issakharian, and the Exhibit  
2 attached to the Motion, all pleadings, papers and records on file with the Court, and on  
3 such other evidence, oral or documentary, as may be presented to the Court at the time of  
4 the hearing on the Motion.

5 **PLEASE TAKE FURTHER NOTICE** that any party requesting a copy of the Motion  
6 or any supporting documents filed with the Court with respect to the Motion may contact  
7 counsel for the Trustee, David M. Goodrich, Golden Goodrich LLP, by email at  
8 dgoodrich@go2.law, by mail at 3070 Bristol Street, Suite 640, Costa Mesa, California  
9 92626, or by telephone at (714) 966-1000.

10 **PLEASE TAKE FURTHER NOTICE** that your rights may be affected. You should  
11 read these papers carefully and discuss them with your attorney, if you have one. If you  
12 do not have an attorney, you may wish to consult one.

13 **PLEASE TAKE FURTHER NOTICE** that any response to the Motion must conform  
14 with Local Bankruptcy Rule 9013-1(f)(1), must be filed with the Bankruptcy Court no less  
15 than 14 days prior to the above hearing date, and must be served no less than **14 days**  
16 prior to the above hearing date on the Trustee's counsel at the address noted in the top  
17 left corner of the first page of this Notice. Pursuant to Local Bankruptcy Rule 9013-1(h),  
18 the failure to timely file and serve an opposition to the Motion may be deemed by the  
19 Court to be consent to the relief requested in the Motion.

20 Dated: May 22, 2025

GOLDEN GOODRICH LLP

21  
22 By: /s/ David M. Goodrich  
DAVID M. GOODRICH  
23 Attorneys for Chapter 7 Trustee  
Wesley H. Avery  
24  
25  
26  
27  
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:

**3070 Bristol St., Suite 640, Costa Mesa, CA 92626**

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF HEARING ON CHAPTER 7 TRUSTEE'S MOTION FOR ORDER: (1) AUTHORIZING SALE OF PERSONAL PROPERTY PURSUANT TO 11 U.S.C. § 363(b); (2) APPROVING BUYER AS GOOD-FAITH PURCHASER PURSUANT TO 11 U.S.C. § 363(m); AND (3) APPROVING COMPROMISE OF CONTROVERSY PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019** 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:

**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*) **May 22, 2025**, 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:

☒ Service information continued on attached page

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

On (*date*) **May 22, 2025**, 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.

May 22, 2025

*Date*

David M. Fitzgerald

*Printed Name*

  
*Signature*

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

Todd M Arnold tma@lnbyg.com  
Wesley H Avery (TR) wes@averytrustee.com, C117@ecfcbis.com; lucy@averytrustee.com; lupe@averytrustee.com  
Jessica L Bagdanov jbagdanov@bg.law, ecf@bg.law  
Beth Gaschen bgaschen@go2.law,  
kadele@go2.law; cmeeker@go2.law; cyoshonis@go2.law; bgaschen@ecf.courtdrive.com; dfitzgerald@go2.law  
David M Goodrich dgoodrich@go2.law, kadele@go2.law; dfitzgerald@go2.law; wggllp@ecf.courtdrive.com  
Steven T Gubner sgubner@bg.law, ecf@bg.law  
Sonja Hourany sonja.hourany@quinngroup.net,  
kadele@wglp.com; lbracken@wglp.com; shourany@ecf.courtdrive.com  
Gary E Klausner gek@lnbyg.com  
Michael S Kogan mkogan@koganlawfirm.com  
Susan K Seflin sseflin@bg.law  
Shalem Shem-Tov shalem@netshemlaw.com, shem-tovsr92445@notify.bestcase.com  
United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov  
Hatty K Yip hatty.yip@usdoj.gov, hatty.k.yip@usdoj.gov

**SERVED BY UNITED STATES MAIL:**

Michael Levine, Inc.  
7526 W. 81st Street  
Playa Del Rey, CA 90293-8807

**DEBTOR**

A.R.D. Services, Inc.  
205 E. 15th Street, #202  
Los Angeles, CA 90015

ARD Services, Inc.  
c/o Andrew Ritholz, Esq.  
501 W. Foothill Blvd  
Monrovia, CA 91016-2021

A.R.D. Services, Inc.  
c/o Ori Blumenfeld  
16030 Ventura Blvd, Ste 470  
Encino, CA 91436

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

Bank of America  
PO Box 982238  
El Paso, TX 79998-2238

California Dept of Tax Fee Admin  
PO Box 942879  
Sacramento, CA 94279-3535

California Dept. of Tax and Fee Administration  
Collections Support Bureau, MIC: 55  
PO Box 942879  
Sacramento, CA 94279-0001

City of Los Angeles  
Office of Finance Special Desk Unit  
North Spring Street, Room 101  
Los Angeles, CA 90012

Deanne M. Shute Revocable Trust  
DBA Exotic Silk  
1959 B Leghorn St  
Mountain View, CA 94043-1797

DWP  
POB 10324  
Van Nuys, CA 91410

ECC Group  
2600 East Coast Highway, Suite 250  
Corona Del Mar, CA 92625-2144

Employment Development Department  
Bankruptcy Group MIC 92E  
PO Box 826880  
Sacramento, CA 94280-0001

FedEx Corporate Services Inc.  
3965 Airways Blvd, Module G, 3rd Floor  
Memphis, TN 38116-5017

Federal Express  
PO Box 7221  
Pasadena, CA 91109-7321

Franchise Tax Board  
Bankruptcy Section MS A340  
PO Box 2952  
Sacramento, CA 95812-2952

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Laurence Alen Freidin  
7526 W 81st Street  
Playa Del Rey, CA 90293-8807

(p)Los Angeles County Treasurer and Tax Collector  
Attn: Bankruptcy Unit  
PO Box 54110  
Los Angeles, CA 90054-0110

Rex Fabrics  
722 Stanford Ave  
Los Angeles, CA 90021-1416

Telio  
625 Deslauriers  
MONTREAL QUEBEC H4N 1W8  
CANADA

Telio Cie  
625 Deslauriers  
SAINT LAURENT  
QC H4N 1W8

XPO Logistics Freight Inc.  
%Bankruptcy Dept  
9151 Boulevard 26  
North Richland Hills, TX 76180-5605

Zigmond Snow Lang  
9301 Oakdale Ave, Suite 375  
Chatsworth, CA 91311-6515



## 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:  
3070 Bristol Street, Suite 640, Costa Mesa, CA 92626

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)* 05/22/2025, 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:

☒ 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

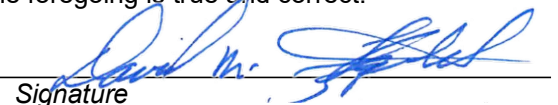
**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or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

05/22/2025  
Date

David M .Fitzgerald  
Printed Name

  
Signature

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

Todd M Arnold tma@lnbyg.com  
Wesley H Avery (TR) wes@averytrustee.com,  
C117@ecfbis.com;lucy@averytrustee.com;lupe@averytrustee.com  
Jessica L Bagdanov jbagdanov@bg.law, ecf@bg.law  
Beth Gaschen bgaschen@go2.law,  
kadele@go2.law;cmeecker@go2.law;cyoshonis@go2.law;bgaschen@ecf.courtdrive.com;dfitzgerald@go2  
.law  
David M Goodrich dgoodrich@go2.law,  
kadele@go2.law;dfitzgerald@go2.law;wgllp@ecf.courtdrive.com  
Steven T Gubner sgubner@bg.law, ecf@bg.law  
Sonja Hourany sonja.hourany@quinngroup.net,  
kadele@wgllp.com;lbracken@wgllp.com;shourany@ecf.courtdrive.com  
Gary E Klausner gek@lnbyg.com  
Michael S Kogan mkogan@koganlawfirm.com  
Susan K Seflin sseflin@bg.law  
Shalem Shem-Tov shalem@netshemlaw.com, shem-tovsr92445@notify.bestcase.com  
United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov  
Hatty K Yip hatty.yip@usdoj.gov, hatty.k.yip@usdoj.gov