

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  RAYMOND H. AVER - SBN 109577 LAW OFFICES OF RAYMOND H. AVER A Professional Corporation 11849 West Olympic Boulevard, Suite 204 Los Angeles, California 90064 Telephone: (310) 571-3511 email: ray@averlaw.com  <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: FREEDOM 26, LLC	FOR COURT USE ONLY
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<b>UNITED STATES BANKRUPTCY COURT</b> <b>CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re:  FREEDOM 26, LLC,        Debtor(s).	CASE NO.: 2:23-bk-16953-DS CHAPTER: 11        <b>NOTICE OF SALE OF ESTATE PROPERTY</b>

<b>Sale Date:</b> 12/19/2024	<b>Time:</b> 1:00 pm
<b>Location:</b> Courtroom 1639, 16th Floor, U.S. Bankruptcy Court, 255 East Temple St., Los Angeles, CA 90012	

**Type of Sale:** ☒ Public ☐ Private **Last date to file objections:** 12/05/2024

**Description of property to be sold:**

11900, 11914, 11918, 11922, 11930-11932 Santa Monica Boulevard, Los Angeles, CA 90025  
and  
1516 and 1518 Brockton Avenue, Los Angeles, CA 90025

**Terms and conditions of sale:**

See attached

**Proposed sale price:** See attached

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 attached

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

Date: December 19, 2024

Time: 1:00 p.m.

Location: Courtroom 1639, 16th Floor, United States Bankruptcy Court, Roybal Federal Building and Courthouse, 255 East Temple Street, Los Angeles, California 90012

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

Raymond H. Aver, Esquire, 11849 West Olympic Boulevard, Suite 204, Los Angeles, CA 90064; (310) 571-3511;  
ray@averlaw.com

Date: 11/28/2024

**Attachment to "Notice Of Sale Of Estate Property"**

**Sale Date and Time:**

December 19, 2024 @ 1:00 p.m.

**Terms and conditions of sale:**

Initial Bid: \$19,000,000 cash at closing

Deposit: \$500,000

Closing Date: 90 days following waiver or satisfaction of  
Bidder's Contingencies and issuance of the Sale Order

The Debtor will be entertaining competing bids, which may  
include a lower purchase price and shorter closing  
period.

**Proposed Sale Price**

\$19 million or best offer

**Overbid Procedures** (subject to Court approval)

- A. Any Bidder who intends to participate in the overbid process must serve the Law Offices Of Raymond H. Aver, APC with an initial overbid, so that it is actually received no later than 24-hours prior to the hearing on this Motion ("Bid Deadline").
- B. Each Initial Overbid must be accompanied by a deposit of not less than \$500,000 in the form of an Automated Clear House ("ACH") transfer, wire transfer, cashier's check, money order, payable to Commerce Escrow.
- C. Each Initial Overbid must be accompanied by proof of available funds necessary to satisfy the Initial Overbid.
- D. Only Bidders with conforming Initial Overbids submitted by the Bid Deadline shall be considered a "Qualified Bidder" and may bid at the sale. The Debtor and the Court shall have the sole authority to determine (i) whether a party is a Qualified Bidder; and (ii) whether the overbid is the highest and best bid and qualifies as the Successful Bidder for the Santa Monica/Brockton Properties.
- E. The Bidder is entitled to overbid and is deemed a Qualified Bidder.

- F. Every subsequent overbid shall be in minimum increments of at least \$25,000. However, in determining the highest or best bid, consideration will be given to, among other criteria, whether the offer is contingent; whether the offer is for all cash; the length of any contingency period; the closing date; length of the escrow period; and the buyers financial ability to close.
- G. Each Qualified Bidder or an authorized representative of the Qualified Bidder must be present at the sale in order to overbid. Any overbid must remain open until the conclusion of the Auction at the Sale Hearing.
- H. If the Buyer is not the Successful Bidder of the Properties, the Successful Bidder shall be deemed the new buyer under the terms of the Purchase Agreement or modified purchase agreement.
- I. The Debtor may accept backup bids.



## 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:

11849 West Olympic Boulevard, Suite 204, Los Angeles, California 90064

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) 11/28/2024, 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) 11/28/2024, 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) 11/28/2024, 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.

11/28/2024  
Date

Raymond H. Aver  
Printed Name

/s/ raymond h aver  
Signature

**SERVICE LIST**

**VIA NEF**

- David Affeld dwa@aejlaw.com
- Raymond H. Aver ray@averlaw.com, averlawfirm@gmail.com
- Sonia Plesset Edwards sedwards@garrett-tully.com
- Sandford L. Frey sfrey@leechtishman.com,  
Imoya@leechtishman.com;dmulvaney@leechtishman.com;rsokol@leechtishman.com;kgutierrez@leechtishman.com;NArango@LeechTishman.com
- Mariel Gerlt-Ferraro mariel.gerlt-ferraro@piblaw.com, rhonda.viers@piblaw.com
- David B Golubchik dbg@lnbyg.com, dbg@lnbyg.com
- Gregory D Hagen gregory@ghagenlaw.com
- Andrew Ethan Hewitt ahewitt@theleichterfirm.com
- Michael W. Knapp mknapp@bradley.com, ynicholson@bradley.com
- Kevin J Leichter kleichter@theleichterfirm.com,  
ahewitt@theleichterfirm.com;assistant@theleichterfirm.com
- Noreen A Madoyan Noreen.Madoyan@usdoj.gov
- Dennette A Mulvaney dmulvaney@leechtishman.com,  
Imoya@leechtishman.com;kgutierrez@leechtishman.com;NArango@LeechTishman.com
- Andrew S Pauly apaul@shoreline-law.com, kbarone@shoreline-law.com
- Jacob N Segura jacob@seguralawcorp.com, stacy@seguralawcorp.com
- Andrew James Shaver ashaver@bradley.com, ashaver@ecf.courtdrive.com
- Sonia Singh ssingh@ecjlaw.com, aantonio@ecjlaw.com, dperez@ecjlaw.com
- Jennifer R. Slater jslater@garrett-tully.com
- Robyn B Sokol rsokol@leechtishman.com,  
rsokol@leechtishman.com;Imoya@leechtishman.com;dmulvaney@leechtishman.com;kgutierrez@leechtishman.com;NArango@LeechTishman.com
- John M Sorich john.sorich@piblaw.com, rhonda.viers@piblaw.com
- Chase Aleksander Stone cstone@ecjlaw.com,  
aantonio@ecjlaw.com, dperez@ecjlaw.com, cmacan@ecjlaw.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

**VIA FIRST CLASS MAIL**

**Debtor**

Freedom 26, LLC  
5812 Washington Boulevard  
Culver City, CA 90232

**Securities & Exchange Commission**

U.S. Securities and Exchange Commission  
Attn: Bankruptcy Counsel  
444 South Flower Street, Suite 900  
Los Angeles, CA 90071-9591

**Twenty Largest Unsecured Creditors**

600 East Sahara, LLC  
5862 West Washington Boulevard  
Culver City, CA 90232

**PROOF OF SERVICE**

1 AP Bookkeeping  
624 South Berendo Street, Apt. 205  
2 Los Angeles, CA 90005

3 Chase  
P.O. Box 9176  
4 Coppell, TX 75019-9176

5 ER & GR, LLC  
801 North Bedford Drive  
6 Beverly Hills, CA 90210

7 Franchise Tax Board  
Bankruptcy Unit  
8 P.O. Box 2952  
Sacramento, CA 95812-2952

9  
10 Gonzalez Law Group, APC  
800 Wilshire Boulevard  
Los Angeles, CA 90017

11 Internal Revenue Service  
12 P.O. Box 7246  
Philadelphia, PA 19101-7346

13  
14 Jacob N. Segura, A Law Corporation  
11400 West Olympic Boulevard, Suite 700  
Los Angeles, CA 90064-1582

15  
16 Malibu, LLC  
606 Maple Drive  
Beverly Hills, CA 90210

17  
18 Michael L. Magasinn as Trustee  
Shamsam Irrevocable Trust  
2945 Townsgate Road, Suite 200  
19 Westlake Village, CA 91361-5866

20 Nationwide Tax  
16027 Ventura Boulevard, Suite 310  
21 Encino, CA 91436

22 Shaoul Levy  
201 North Wilshire Boulevard, Suite 200  
23 Santa Monica, CA 90401

24 Shoreline, ALC  
1299 Ocean Avenue, Suite 400  
25 Santa Monica CA 90401-1007

26 The Leichter Firm, APC  
10203 Santa Monica Boulevard, 4<sup>th</sup> Floor  
27 Los Angeles, CA 90067

28



Winhall 5, LLC  
c/o Rossrock Servicing, LLC  
446 East Meadow Avenue, #172  
East Meadow, NY 11554

Center for Disability Access, APC  
100 Pine Street, Suite 1250  
San Francisco, CA 94111

Prathima Reddy  
The Reddy Law Firm  
103 Bay Park Terrace  
Alameda, CA 9502

Helio Group  
c/o Scale Partners  
750 North San Vicente Boulevard, Suite 800  
West Hollywood, CA 90069

JSA Properties  
2121 South Bentley Avenue, Suite 104  
Los Angeles, CA 90025

United El Segundo, Inc.  
c/o Highland Premiere  
12696 Millennium Drive  
Los Angeles, CA 90094

Ishak Bibawi  
c/o KW Commercial  
11812 San Vicente Boulevard, Suite 100  
Los Angeles, CA 90049

Passo, LLC  
c/o Compass  
8560 West Sunset Boulevard, 3<sup>rd</sup> Floor  
West Hollywood, CA 90069

Isaac Cohanzad  
Wiseman Residential  
11601 Santa Monica Boulevard  
Los Angeles, CA 90025

Jewish Education Movement, Inc.  
9930 Santa Monica Boulevard  
Beverly Hills, CA 90212

**VIA PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL**

Honorable Deborah Saltzman  
Bin outside Suite 1634  
Judge's Copy temporarily suspended by General Order 20-02