

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Joseph E. Caceres, Esq. (SBN 169164) CACERES & SHAMASH, LLP 9701 Wilshire Boulevard, Suite 1000 Beverly Hills, California 90212 Telephone: (310) 205-3400 Facsimile: (310) 878-8308 Email: jec@locs.com  Attorney for The Accomodator Group, Inc., as Plan Administrator for Reorganized Behnam Rafalian and Freedom 26, LLC Debtors  <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Accomodator Group, Inc., Plan Admin.	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT 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> 09/30/2025	<b>Time:</b> 1:00 pm
<b>Location:</b> Courtroom 1639, U.S. Bankruptcy Court, 255 East Temple Street, Los Angeles, CA 90012	

**Type of Sale:** ☒ Public ☐ Private **Last date to file objections:** 09/16/2025

**Description of property to be sold:**

Retail, office, warehouse, and residential properties located at:  
11900, 11914, 11918, 11922, and 11930-11932 Santa Monica Boulevard, Los Angeles, California 90025  
and  
1516 and 1518 Brockton Avenue, Los Angeles, California 90025

**Terms and conditions of sale:**

See attached Notice of Hearing on Sale Motion

**Proposed sale price:** See attached Notice of Hearing on Sale Motion

**Overbid procedure (if any):**

See attached Notice of Hearing on Sale Motion

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

Date: September 30, 2025

Time: 1:00 p.m.

Place: Courtroom 1639

U.S. Bankruptcy Court

Roybal Federal Building and Courthouse

255 E. Temple Street

Los Angeles, CA 90012

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

Broker: Newmark Pacific, c/o David Ghermezian, Senior Managing Director\*\*

1875 Century Park East, Suite 1380

Los Angeles, CA 90067

Tel: (310) 407-6573 Cell: (310) 801-8700

Email: david.ghermezian@nmrk.com

Seller: The Accomodator Group, Inc., Plan Administrator, c/o Charles Shamash

9701 Wilshire Boulevard, Suite 1000

Beverly Hills, California 90212

Tel: (310) 594-8114 Cell: (310) 560-4000

Email: cs@locs.com

Date: 09/09/2025

**\*\*Please Note: Newmark Pacific has set up an online documents room where any interested bidder may review documents and information related to the sale of the Santa Monica/Brockton Properties, as follows:**

**<http://platform.reverecre.com/project/95057092-babf-4429-8b85-4b12fc301a01/files>**

**You should periodically check the documents room as new documents or information may be posted periodically.**

**File a Notice:**

[2:23-bk-16953-DS Freedom 26, LLC](#)

Type: bk  
Assets: y

Chapter: 11 v  
Judge: DS

Office: 2 (Los Angeles)

**U.S. Bankruptcy Court  
Central District of California**

Notice of Electronic Filing

The following transaction was received from Joseph E Caceres entered on 9/8/2025 at 5:05 PM PDT and filed on 9/8/2025

**Case Name:** Freedom 26, LLC

**Case Number:** [2:23-bk-16953-DS](#)

**Document Number:** [336](#)

**Docket Text:**

Notice of Hearing *with proof of service* Filed by Other Professional The Accomodator Group, Inc., Plan Administrator (RE: related document(s)[335] Motion to Sell Property of the Estate Free and Clear of Liens under Section 363(f) *Motion of the Accomodator Group, Inc., Plan Administrator, for Order Authorizing Sale of Real Property, Free and Clear of Liens, Claims, and Interests, Subject to Overbid; Declarations of Charles Shamash and David Ghermezian in Support Thereof; with proof of service [Re: Santa Monica/Brockton Properties]*. Fee Amount \$199, Filed by Other Professional The Accomodator Group, Inc., Plan Administrator). (Caceres, Joseph)

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**F26-TAG Sale Mtn-Ntc (SMB)-ff.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=1106918562 [Date=9/8/2025] [FileNumber=109191339-0] [9ac1929cd942f9ac94ba53344906c4cc346877d1afe93c2c1b8c6b854efb35ae66c2fedfa601080b354b2b7f50ef49b595c4da3e5f2ec89d4a560f0edf584b25]]

**2:23-bk-16953-DS Notice will be electronically mailed to:**

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dwa@aejlaw.com

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Raymond H. Aver on behalf of Defendant Freedom 26, LLC  
ray@averlaw.com, averlawfirm@gmail.com;ani@averlaw.com;katya@averlaw.com;jesus@averlaw.com

Joseph E Caceres on behalf of Interested Party Courtesy NEF  
jec@locs.com, generalbox@locs.com

Joseph E Caceres on behalf of Other Professional The Accomodator Group, Inc., Plan Administrator  
jec@locs.com, generalbox@locs.com

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sedwards@garrett-tully.com

Sonia Plesset Edwards on behalf of Defendant Winhall 5 LLC  
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Sonia Plesset Edwards on behalf of Plaintiff Winhall 5 LLC  
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lmoya@leechtishman.com;dmulvaney@leechtishman.com;rsokol@leechtishman.com;NArango@LeechTishman.com;dbender@leechtishman.com;nmeysers@leechtishman.c

Sandford L. Frey on behalf of Interested Party Behnam Rafalian  
sfrey@leechtishman.com,  
lmoya@leechtishman.com;dmulvaney@leechtishman.com;rsokol@leechtishman.com;NArango@LeechTishman.com;dbender@leechtishman.com;nmeysers@leechtishman.c

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David B Golubchik on behalf of Interested Party Michael L. Magasinn as the Trustee of the Shamsam Irrevocable Trust  
dbg@lnbyg.com, dbg@lnbyg.com

David B Golubchik on behalf of Interested Party David B. Golubchik  
dbg@lnbyg.com, dbg@lnbyg.com

David B Golubchik on behalf of Other Professional Mehrdad D Ebrahimpour  
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Gregory D Hagen on behalf of Defendant ER & GR LLC  
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Gregory D Hagen on behalf of Defendant Malibu LLC  
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Gregory D Hagen on behalf of Defendant Behrooz Rafalian  
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Gregory D Hagen on behalf of Defendant Ebrahim Rafalian  
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Gregory D Hagen on behalf of Interested Party ER & GR LLC  
gregory@ghagenlaw.com

Gregory D Hagen on behalf of Interested Party Malibu LLC  
gregory@ghagenlaw.com

Gregory D Hagen on behalf of Interested Party Behrooz Refalian  
gregory@ghagenlaw.com

Gregory D Hagen on behalf of Interested Party Ebrahim Rafalian  
gregory@ghagenlaw.com

Andrew Ethan Hewitt on behalf of Interested Party The Leichter Firm  
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Andrew Ethan Hewitt on behalf of Plaintiff Michael L. Magasinn as Trustee of the Shamsam Irrevocable Trust  
ahewitt@theleichterfirm.com

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Michael W. Knapp on behalf of Defendant Winhall 5 LLC  
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Michael W. Knapp on behalf of Plaintiff Winhall 5 LLC  
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kleichter@theleichterfirm.com, ahewitt@theleichterfirm.com;assistant@theleichterfirm.com

Kevin J Leichter on behalf of Plaintiff Winhall 5 LLC  
kleichter@theleichterfirm.com, ahewitt@theleichterfirm.com;assistant@theleichterfirm.com

Noreen A Madoyan on behalf of U.S. Trustee United States Trustee (LA)  
Noreen.Madoyan@usdoj.gov

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Jacob N Segura on behalf of Interested Party Jacob N. Segura  
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Andrew James Shaver on behalf of Plaintiff Winhall 5 LLC  
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Jennifer R. Slater on behalf of Plaintiff Winhall 5 LLC  
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Robyn B Sokol on behalf of Interested Party Robyn Sokol  
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Chase Aleksander Stone on behalf of Other Professional Blake Alsbrook  
cstone@ecjlaw.com, aantonio@ecjlaw.com, dperez@ecjlaw.com, cmacan@ecjlaw.com

United States Trustee (LA)  
ustpreion16.la.ecf@usdoj.gov

**2:23-bk-16953-DS Notice will not be electronically mailed to:**

Roger G Jones on behalf of Creditor Winhall 5, LLC  
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Los Angeles, CA 90064

Newmark of Southern California, Inc.

,

Jeffrey G Thomas  
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Los Angeles, CA 90025

Gregg D Zucker  
Foundation Law Group LLP  
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Joseph E. Caceres, Esq. (SBN 169164)  
CACERES & SHAMASH, LLP  
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Beverly Hills, California 90212  
Telephone: (310) 205-3400  
Facsimile: (310) 878-8308  
Email: jec@locs.com

Attorney for The Accomodator Group, Inc., as Plan  
Administrator for Reorganized Behnam Rafalian and  
Freedom 26, LLC Debtors

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION

In re

FREEDOM 26, LLC,

) Case No. 2:23-bk-16953-DS

) Chapter 7

) **NOTICE OF HEARING ON:**  
) **MOTION OF THE ACCOMODATOR**  
) **GROUP, INC., PLAN ADMINISTRATOR,**  
) **FOR ORDER AUTHORIZING SALE OF**  
) **REAL PROPERTY, FREE AND CLEAR OF**  
) **LIENS, CLAIMS, AND INTERESTS,**  
) **SUBJECT TO OVERBID**

) *[Re: Santa Monica/Brockton Properties]*

) Date: September 30, 2025

) Time: 1:00 p.m.

) Place: Courtroom 1639

) 255 E. Temple Street

) Los Angeles, CA 90012

Debtor(s).

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1 **TO THE HONORABLE DEBORAH J. SALTZMAN, UNITED STATES BANKRUPTCY**  
2 **JUDGE, THE UNITED STATES TRUSTEE, AND OTHER INTERESTED PARTIES:**

3 **PLEASE TAKE NOTICE** that on the above date and time and in the indicated  
4 courtroom, a hearing will take place on the *Motion of the Accomodator Group, Inc., Plan*  
5 *Administrator* (“TAG”), *For Order Authorizing Sale of Real Property, Free and Clear of Liens,*  
6 *Claims, and Interests, Subject to Overbid; Declarations of Charles Shamash and David*  
7 *Ghermezian in Support Thereof* (the “Sale Motion”), pursuant to 11 U.S.C. §§ 105(a) and 363.  
8 Based on TAG’s sound business judgment, TAG believes the sale of the Property as set forth in  
9 the Motion and herein is in the best interests of creditors.

10 **PLEASE TAKE FURTHER NOTICE** that through the Motion, TAG seeks an order  
11 approving the sale of the retail, office, warehouse, and residential properties located at **11900,**  
12 **11914, 11918, 11922, and 11930-11932 Santa Monica Boulevard, Los Angeles, California**  
13 **90025 and 1516 and 1518 Brockton Avenue, Los Angeles, California 90025** (collectively the  
14 “Santa Monica/Brockton Properties” or “SMB Properties”), on the terms and conditions specified  
15 in the accepted Purchase and Sale Agreement and all Amendments thereto (collectively, the  
16 “Purchase Agreement”), attached to the Sale Motion as **Exhibits 1-2** thereto, and incorporated  
17 herein by reference, to F&E 2012 Revocable Trust (the “Buyer” or “F&E Trust”), for **\$14.5**  
18 **million** (the “Sale Price”), **or to any person or entity that appears at the hearing on the**  
19 **Motion that has submitted a higher acceptable bid in accordance with TAG’s proposed**  
20 **overbid procedures, as set forth in the Sale Motion and reproduced below.**

21 **PLEASE TAKE FURTHER NOTICE** that, as part of the Sale Motion, TAG seeks an  
22 order approving the sale free and clear of all liens, claims, and interests. The Property is being  
23 sold as-is, where-is, **with no contingencies whatsoever, and no warranties or representations**  
24 **by Seller.** In particular, TAG seeks an order:

25 (1) that TAG has the authority to sell the Santa Monica/Brockton Properties on its own  
26 with or without further consent or signatures by the Non-Debtor owners, Debtors, or anyone else,  
27 including but not necessarily limited to, the principals of the Non-Debtor Owners or Debtors, or  
28 any of their spouses; and the authority to execute and deliver any and all documentation, deed, or

1 any other escrow or transfer documents necessary, appropriate, and required to market and sell the  
2 Santa Monica/Brockton Properties; and, to the extent necessary, appointing Charles Shamash to  
3 sign for the non-Debtor owners, with the same effect as if the Non-Debtor owners had signed  
4 themselves;

5 (2) approving the proposed overbid procedures described in the Sale Motion and  
6 reproduced below;

7 (3) approving the sale of the Property to Buyer or its assignee, or to the highest  
8 Qualified Overbidder, free and clear of liens, claims, and interests, with the proceeds attaching to  
9 any asserted liens to the same extent, validity, and priority as they existed prior to the close of  
10 escrow, pursuant to the procedures set forth herein, **except the sale will be subject to the L.A.  
11 Housing Department's Reap Program and lien, which will remain on the property;**

12 (4) that no payment shall be made out of escrow to Shamsam Trust (rather, TAG will  
13 distribute the net proceeds it receives to the Shamsam Trust, the Professional Fee Carveout, and  
14 any necessary reserve for administrative costs, in accordance with this Court's previous orders);

15 (5) approving the payment through escrow of (a) the claims of valid lienholders on the  
16 Property; (b) ordinary and reasonable costs such as, but not necessarily limited to, property and  
17 transfer taxes, title fees, escrow fees, broker commissions totaling 2% to Newmark Pacific (or as  
18 may be determined at the hearing should any Qualified Overbidder become the Winning Bidder),  
19 and other ordinary closing costs as per usual procedures; and (c) reimbursement to TAG in the  
20 amount of \$20,000.00, along with other reimbursements as set forth on the Estimated Closing  
21 Statement attached as **Exhibit 3** to the Sale Motion;

22 (6) authorizing and directing escrow to pay all net proceeds of the sale after payment of the  
23 foregoing to TAG, to be held by TAG for future disbursement in accordance with the Court's  
24 prior orders;

25 (7) that should TAG request it at the sale hearing, pending its review of the claims and  
26 charges asserted in escrow by the L.A. County Tax Collector or any other lien, claim, or interest  
27 that may be asserted, that up to all net proceeds of the sale after payment of ordinary and  
28 reasonable costs be paid over to TAG, to be held by TAG for future disbursement in accordance

1 with the Court's prior orders, with liens to attach to the proceeds of sale to the same extent,  
2 validity, and priority with which they attached to the Property, as adequate protection under 11  
3 U.S.C. § 363(e) (except with respect to the L.A. Housing Department's Reap Program and lien,  
4 which will remain on the property); and to effectuate this procedure, order that TAG be authorized  
5 to instruct escrow to pay any undisputed amounts of said liens to the respective claimants, with the  
6 disputed amounts paid over to TAG, to be reserved pending further Court order or agreement with  
7 the affected lienholder(s), if any;

8 (8) authorizing and directing TAG and Buyer or a qualified successful overbidder to  
9 execute any and all documents necessary to transfer the Property from the estate to Buyer (or to  
10 any qualified successful overbidder);

11 (9) finding that Buyer or a qualified successful overbidder is a good-faith purchaser  
12 pursuant to 11 U.S.C. § 363(m);

13 (10) that the automatic 14-day stay of Fed.R. Bankr. Proc. 6004(h) is waived;

14 (11) retaining jurisdiction to (i) enforce and implement the terms and provisions of the  
15 Purchase Agreement, all addendums and amendments thereto, any waivers and consents  
16 thereunder, and any other supplemental documents or agreements executed in connection  
17 therewith or the Escrow; (ii) compel delivery and payment of the consideration provided for under  
18 the Purchase Agreement; and (iii) resolve any disputes, controversies or claims arising out of or  
19 relating to the Purchase Agreement; and

20 (12) granting such other and further relief as the Court deems just and proper.

21 **PLEASE TAKE FURTHER NOTICE** that the proposed sale to Buyer is subject to  
22 overbids of any qualified third party. TAG proposes that the following overbid procedures, which  
23 are subject to Court approval, be used at the hearing on the Motion (the "Sale Hearing") for  
24 considering overbids:

25 **Proposed Overbid Procedures/Competing Offers**

26 A. **Qualification to Overbid.** Each potential bidder (other than Buyer F&E Trust or its  
27 assignee) in order to be a Qualified OverBidder at the Hearing, shall -

28 a. Deposit **by wire transfer** the sum of \$1 million directly with TAG, **which must be**  
**received and verified by TAG no later than one (1) day before the hearing,**

1           **such deposit to immediately be non-refundable regardless of whether the**  
2           **overbidder completes the sale or not for any reason** (i.e., the same amount of  
3           F&E Trust's now non-refundable deposit) (the "Earnest Money Deposit"). TAG  
4           shall return the Earnest Money Deposit of any Qualified Overbidder if it accepts  
5           the bid of another bidder and said Qualified OverBidder does not become a Backup  
6           Bidder;

7           b.     at least one (1) day prior to the Sale Hearing, provide proof of funds to TAG and its  
8           representatives (including counsel and Newmark), showing that the overbidder has  
9           the ability to pay the balance of any bid made by such bidder, such proof to be  
10          deemed acceptable or unacceptable by TAG in its sole and absolute discretion;

11          c.     at least one (1) day prior to the Sale Hearing, inform TAG in writing (a) that the  
12          overbidder agrees to be bound by the same terms and conditions specifically  
13          contained in the F&E Trust Purchase Agreement with subsequent Amendments,  
14          collectively attached to the Sale Motion as Exhibits 1-2, **with no contingencies**  
15          **whatsoever, and no warranties or representations by TAG**, and (b) if  
16          represented by a broker other than Newmark, what the commission structure of the  
17          overbid is;

18          d.     attend the Hearing; and

19          2.     Initial and Subsequent Overbids. The initial overbid shall be a total of at least five  
20          hundred thousand dollars (\$500,000.00) more than the Sales Price (i.e., overbids shall start at \$15  
21          million or more), and all additional/subsequent overbids must be made in minimum increments of  
22          two hundred and fifty thousand dollars (\$250,000.00);<sup>1</sup> and

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24                   <sup>1</sup>TAG has been made aware that the commission structure may be different for one or more  
25          overbids that are allegedly coming. For example, while the commission for the sale to F&E Trust is a  
26          total of 2% to Newmark given that it is representing both Seller and Buyer, one of the alleged  
27          overbidders has informed TAG verbally that its offer will call for a 2.5% commission, split 1.5% to  
28          Newmark and 1% to the overbidder's broker. Another now-rejected bid was just received that would  
        have required a total commission of 4.5%. In other words, other bidders may have a different, and  
        higher, commission structure. Hence, although TAG has tried to structure the overbid increments to  
        more than cover the extra cost of commissions (as well as transfer taxes and potentially other costs),  
        TAG will consider the overall economic benefit of any overbids in determining which offer is best.

1           3.     Winning Bidder/Close of Escrow/Liquidated Damages. Whether Buyer F&E Trust  
2 or an overbidder is declared the winning bidder at the Sale Hearing (the “Winning Bidder”), such  
3 Winning Bidder shall have seven (7) days after entry of a court order approving the sale to close  
4 escrow. If the Winning Bidder, whether original Buyer or a successful overbidder, fails to close  
5 escrow within the applicable period above due to such Winning Bidder’s default, TAG may  
6 unilaterally cancel the purchase contract and escrow via written instructions to escrow, without the  
7 need for a joint instruction from both the Winning Bidder and the Seller. In such a case the  
8 Winning Bidder shall forfeit its Earnest Money Deposit, and escrow shall remit said Earnest  
9 Money Deposit to TAG upon demand by TAG, unless TAG has previously received said deposit.  
10 However, in its sole and absolute discretion TAG may, but is not required to, extend the escrow  
11 closing period by written instructions to escrow, so as to allow the sale to the Winning Bidder to  
12 close.

13           TAG also requests approval of a Backup Bidder should the Winning Bidder fail to close  
14 the sale escrow within the applicable period above. If the Winning Bidder is someone other than  
15 original Buyer F&E Trust, F&E Trust has agreed to become the Backup Bidder at the current Sale  
16 Price of \$14.5 million. In any event, if escrow closes with the Winning Bidder, TAG will return  
17 the Backup Bidder’s earnest money deposit, although previously deemed non-refundable. On the  
18 other hand, if escrow closes with the Backup Bidder, the Winning Bidder’s earnest money deposit  
19 will be deemed forfeited and will not be returned, since that will have occurred due to the  
20 Winning Bidder’s default.

21           **PLEASE TAKE FURTHER NOTICE** that the Debtor’s Court-approved real estate  
22 broker, Newmark Pacific (“Newmark”) has set up an online documents room where any interested  
23 bidder may review documents and information related to the sale of the Santa Monica/Brockton  
24 Properties, as follows:

25           <http://platform.reverecre.com/project/95057092-babf-4429-8b85-4b12fc301a01/files>

26           \*You should periodically check the documents room as new documents or information  
27 may be posted periodically. You may also contact the Broker or Plan Administrator to discuss the  
28 matter as follows:

1 NEWMARK  
2 c/o David Ghermezian, Senior Managing Director  
3 1875 Century Park East, Suite 1380  
4 Los Angeles, CA 90067  
5 Tel: (310) 407-6573 Cell: (310) 801-8700  
6 Email: david.ghermezian@nmrk.com

7 The Accomodator Group, Inc., Plan Administrator  
8 c/o Charles Shamash  
9 9701 Wilshire Boulevard, Suite 1000  
10 Beverly Hills, California 90212  
11 Tel: (310) 594-8114 Cell: (310) 560-4000  
12 Email: cs@locs.com

13 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Bankruptcy Rule 9013-  
14 1(f), if you wish to oppose or respond to the Sale Motion, you must both file a written opposition  
15 or response with the Bankruptcy Court and serve a copy of it upon TAG's counsel and the United  
16 States Trustee at the addresses set forth in the upper left hand corner of the face page of this  
17 document and in the attached proof of service, no later than fourteen (14) days prior to the above  
18 hearing date. Pursuant to Local Bankruptcy Rule 9013-1(h), the failure to timely file and serve an  
19 opposition or response to the Sale Motion may be deemed by the Court to be consent to the  
20 granting of the Sale Motion. A copy of the Sale Motion may be viewed at the Bankruptcy Clerk's  
21 office located at 255 E. Temple Street, Los Angeles, CA 90012, or at the Broker's online  
22 documents room discussed above. A copy may also be obtained by contacting the undersigned as  
23 indicated on the top left hand corner of the face page of this notice.

24 DATED: September 8, 2025

CACERES & SHAMASH, LLP

25 By: /s/ Joseph E. Caceres  
26 Joseph E. Caceres, Esq.  
27 Attorney for The Accomodator Group, Inc., as Plan  
28 Administrator for Reorganized Behnam Rafalian and  
Freedom 26, LLC Debtors

## 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:  
9701 Wilshire Blvd., Suite 1000, Beverly Hills, CA 90212

The foregoing documents described as **Notice of Hearing On: Motion of the Accomodator Group, Inc., Plan Administrator, For Order Authorizing Sale of Real Property, Free and Clear of Liens, Claims, and Interests, Subject to Overbid** 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 09/08/2025 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 stated below:

☒ Service information continued on attached page

II. **SERVED BY UNITED STATES MAIL:** On (date) 09/08/2025, 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.

Current Lender:  
Regal Investment Fund, LLC  
c/o Shaffer Financial  
18541 Sherman Way, Suite 201  
Reseda, CA 91335

LAHD:  
Los Angeles Housing Dept., REAP Program  
1910 Sunset Blvd., Suite 300  
Los Angeles, CA 90026

☒ 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 09/08/2025, 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 personal delivery on the judge will be completed no later than 24 hours after the document is filed.*

### **Bankruptcy Judge**

\*No Judge's Copy necessary unless requested per information on Court's website\*

☐ 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.

09/08/2025  
*Date*

Joseph E. Caceres  
*Type Name*

/s/ Joseph E. Caceres  
*Signature*

### Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **David Affeld** dwa@aejlaw.com
- **Raymond H. Aver** ray@averlaw.com, averlawfirm@gmail.com; ani@averlaw.com; katya@averlaw.com; jesus@averlaw.com
- **Joseph E Caceres** jec@locs.com, generalbox@locs.com
- **Sonia Plesset Edwards** sedwards@garrett-tully.com
- **Sandford L. Frey** sfrey@leechtishman.com, lmoya@leechtishman.com; dmulvaney@leechtishman.com; rsokol@leechtishman.com; NArango@LeechTishman.com; dbender@leechtishman.com; nmeyers@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, David.S.Shevitz@usdoj.gov
- **Dennette A Mulvaney** dmulvaney@leechtishman.com, lmoya@leechtishman.com; NArango@LeechTishman.com; dbender@leechtishman.com
- **Andrew S Pauly** apauly@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, klee@garrett-tully.com
- **Robyn B Sokol** rsokol@leechtishman.com, rsokol@leechtishman.com; lmoya@leechtishman.com; dmulvaney@leechtishman.com; NArango@LeechTishman.com; dbender@leechtishman.com; nmeyers@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

### Manual Notice List

The following is the list of **parties** who are **not** on the list to receive email notice/service for this case (who therefore require manual noticing/service). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

#### **Roger G Jones**

Bradley Arant Boult Cummings LLP  
1600 Division Street Suite 700  
Nashville, TN 37203

#### **Law Offices of Raymond H. Aver, APC**

10801 National Boulevard, Suite 100  
Los Angeles, CA 90064

#### **Newmark of Southern California, Inc.**

,

#### **Jeffrey G Thomas**

1516 Brockton Ave #4  
Los Angeles, CA 90025

#### **Gregg D Zucker**

Foundation Law Group LLP  
2049 Century Park East Suite 2460  
Los Angeles, CA 90067

### [Creditor List](#)

Click the link above to produce a complete list of **creditors** only.

### [List of Creditors](#)

Click on the link above to produce a list of **all** creditors and **all** parties in the case. User may sort in columns or raw data format.

Label Matrix for local noticing  
0973-2  
Case 2:23-bk-16953-DS  
Central District of California  
Los Angeles  
Fri Sep 5 11:50:18 PDT 2025

The Leichter Firm  
10203 SANTA MONICA BLVD, FOURTH FLOOR  
LOS ANGELES, CA 90067-6405

United States Trustee (LA)  
915 Wilshire Blvd, Suite 1850  
Los Angeles, CA 90017-3560

Los Angeles Division  
255 East Temple Street,  
Los Angeles, CA 90012-3332

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

AP Bookkeeping  
624 South Berendo Street, Apt. 205  
Los Angeles, CA 90005-1715

Behnam Rafalian c/o Leech Tishman  
200 S. Los Robles Avenue, Suite 300  
Pasadena, CA 91101-2483

Behrooz Refalian  
c/o G. Hagen Law Office  
440 Stevens Ave. Suite 200  
Solana Beach CA 92075-2059

Blake C. Alsbrook, State Court Receiver  
9401 Wilshire Blvd., 12th Floor  
Beverly Hills, CA 90212-2944

Chase  
PO Box 9176  
Coppell, TX 75019-9176

Chase Mortgage Holdings, Inc.  
c/o Parker Ibrahim & Berg LLP  
695 Town Center Drive, 16th FL  
Costa Mesa, CA 92626-1924

ER & GR LLC  
801 North Bedford Drive  
Beverly Hills, CA 90210-3023

Ebrahim Rafalian  
c/o G. Hagen Law Office  
440 Stevens Avenue, Suite 200  
Solana Beach CA 92075-2059

FRANCHISE TAX BOARD  
BANKRUPTCY SECTION MS A340  
PO BOX 2952  
SACRAMENTO CA 95812-2952

Farzin Maly  
12304 Santa Monica blvd #216  
Los Angeles CA 90025-2587

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

Gonzalez Law Group, APC  
800 Wilshire Boulevard  
Los Angeles, CA 90017-2796

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

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

(p)LOS ANGELES COUNTY TREASURER AND TAX COLLE  
ATTN BANKRUPTCY UNIT  
PO BOX 54110  
LOS ANGELES CA 90054-0110

Malibu, LLC  
606 North Maple Drive  
Beverly Hills, CA 90210-3410

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

Nationwide Tax  
16027 Ventura Boulevard, Suite 310  
Encino, CA 91436-2781

Parker Ibrahim & Berg LLP  
John M. Sorich  
Mariel Gerlt-Ferraro  
3070 Bristol Street, Suite 660  
Costa Mesa, CA 92626-3014

Shahram Elyaszadeh, E&E Mortgage Bankers Cor  
E.L.Y. Mortgage Bankers Corp  
Affeld England & Johnson LLP c/o David A  
2049 Century Park East, Suite 2460  
Los Angeles CA 90067-3126

Shaoul Levy  
201 North Wilshire Boulevard  
Suite 200  
Santa Monica, CA 90401-1219

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

The Leichter Firm, APC  
10203 Santa Monica Boulevard  
4th Floor  
Los Angeles, CA 90067-6439

Winhall 5, LLC

c/o Rossrock Servicing, LLC

446 East Meadow Avenue, #172

East Meadow, NY 11554-6003

Yona Samih Yonah Investments Group LLC

Lion Solar LLC, Nice Team LLC, Stonehave

Affeld England & Johnson LLP c/o David A

2049 Century Park East, Suite 2460

Los Angeles CA 90067-3126

Blake Alsbrook

State Court Receiver

9401 Wilshire Blvd., 12th Floor

Beverly Hills, CA 90212-2944

Gregg D Zucker

Foundation Law Group LLP

2049 Century Park East Suite 2460

Los Angeles, CA 90067-3126

Jacob N. Segura

11400 W Olympic Blvd, Ste 700

Los Angeles, CA 90064-1582

Jeffrey G Thomas

1516 Brockton Ave #4

Los Angeles, CA 90025-2746

Mehrdad D Ebrahimpour

trustee of the Shamsam Irrevocable Trust

c/o Gregg D Zucker Esq

Foundation Law Group LLP

2049 Century Park East Suite 2460

Los Angeles, CA 90067-3126

Raymond H. Aver

Law Offices of Raymond H. Aver

A Professional Corporation

10801 National Boulevard, Suite 100

Los Angeles, CA 90064-4140

Shahram Elyaszdeh

Affeld England & Johnson LLP

2049 Century Park E, Suite 2460

Los Angeles, CA 90067-3126

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Los Angeles County Treasurer and Tax Collect

PO Box 54110

Los Angeles, CA 90054

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Courtesy NEF

(u)ER & GR LLC

(u)JPMorgan Chase Bank, N.A.

(u)Malibu LLC

(u)Michael L. Magasinn as the Trustee of the

(u)Newmark of Southern California, Inc.

(u)SALAR INVESTMENTS LLC

(u)The Accomodator Group, Inc., Plan Administ

(u)Winhall 5, LLC

(d)Franchise Tax Board  
Bankruptcy Section MS A340  
PO BOX 2952  
Sacramento CA 95812-2952

(u)Behnam Rafalian

(u)Behrooz Refalian

End of Label Matrix  
Mailable recipients 38  
Bypassed recipients 15  
Total 53

## 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:  
9701 Wilshire Blvd., Suite 1000, Beverly Hills, CA 90212

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)* 09/09/2025, 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)* 09/09/2025, 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.

Bankruptcy Judge:

\*No Judge's Copy necessary unless requested per information on Court's website\*

☐ 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.

09/09/2025  
*Date*

Joseph E. Caceres  
*Printed Name*

/s/ Joseph E. Caceres  
*Signature*

### Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **David Affeld** dwa@aejlaw.com
- **Raymond H. Aver** ray@averlaw.com, averlawfirm@gmail.com; ani@averlaw.com; katya@averlaw.com; jesus@averlaw.com
- **Joseph E Caceres** jec@locs.com, generalbox@locs.com
- **Sonia Plesset Edwards** sedwards@garrett-tully.com
- **Sandford L. Frey** sfrey@leechtishman.com, lmoya@leechtishman.com; dmulvaney@leechtishman.com; rsokol@leechtishman.com; NArango@LeechTishman.com; dbender@leechtishman.com; nmeyers@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, David.S.Shevitz@usdoj.gov
- **Dennette A Mulvaney** dmulvaney@leechtishman.com, lmoya@leechtishman.com; NArango@LeechTishman.com; dbender@leechtishman.com
- **Andrew S Pauly** apauly@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, klee@garrett-tully.com
- **Robyn B Sokol** rsokol@leechtishman.com, rsokol@leechtishman.com; lmoya@leechtishman.com; dmulvaney@leechtishman.com; NArango@LeechTishman.com; dbender@leechtishman.com; nmeyers@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

### Manual Notice List

The following is the list of **parties** who are **not** on the list to receive email notice/service for this case (who therefore require manual noticing/service). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

#### **Roger G Jones**

Bradley Arant Boult Cummings LLP  
1600 Division Street Suite 700  
Nashville, TN 37203

#### **Law Offices of Raymond H. Aver, APC**

10801 National Boulevard, Suite 100  
Los Angeles, CA 90064

#### **Newmark of Southern California, Inc.**

,

#### **Jeffrey G Thomas**

1516 Brockton Ave #4  
Los Angeles, CA 90025

#### **Gregg D Zucker**

Foundation Law Group LLP  
2049 Century Park East Suite 2460  
Los Angeles, CA 90067

### [Creditor List](#)

Click the link above to produce a complete list of **creditors** only.

### [List of Creditors](#)

Click on the link above to produce a list of **all** creditors and **all** parties in the case. User may sort in columns or raw data format.