

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Anthony O. Egbase, Esq. (SBN 181721) Shana Y. Stark, Esq. (SBN: 171555) A.O.E LAW & ASSOCIATES A Professional Law Corporation 800 W. 1st Street, Suite 400 Los Angeles, California 90012 Tel: (213) 620-7070 Email: info@aoelaw.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Debtor and Debtor-in-Possession</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>Lucky Number Seven, Inc.</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 2:24-bk-15263-VZ CHAPTER: 11</p> <p style="text-align: center;">NOTICE OF SALE OF ESTATE PROPERTY</p>
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<p>Sale Date: 12/10/2024</p>	<p>Time: 11:00 am</p>
<p>Location: Courtroom 1368 (Hon. Vincent P. Zurzolo) 255 E. Temple St., Los Angeles, CA 90012</p>	

Type of Sale: Public Private **Last date to file objections:** _____

Description of property to be sold:
188 WEST BASE LINE STREET, SAN BERNARDINO, CA 92410

Terms and conditions of sale:
See attached Notice of Motion and Hearing. Sale price is \$290,000.00 subject to overbid by Qualified Bidders at the hearing. Initial overbid is at \$300,000.00. Subsequent overbids are in increments of \$5,000.00. No contingencies.

Proposed sale price: \$ 300,000.00 _____

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): Overbid packages must be received by 12/6/2024 at 9:00 a.m. including (i) written offer of at least \$300,000.00, (ii) satisfactory proof of funds in the highest amount bidder wishes to be qualified to bid, (iii) waiver of all contingencies and further due diligence. See Sale Motion for further details (Docket No. 92)

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

December 10, 2024 at 11:00 a.m.
Courtroom 1368 (Hon. Vincent P. Zurzolo)
255 E. Temple Street, Los Angeles, CA 90012

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

Anthony O. Egbase, Counsel for Debtor
A.O.E. Law & Associates, APC
800 W. 1st Street, Suite 100
Los Angeles, CA 90012
Tel: 213-620-7070; Email: info@aoelaw.com

Date: 11/15/2024

1 Anthony O. Egbase, Esq. (SBN 181721)
2 Shana Y. Stark, Esq. (SBN: 171555)
3 **A.O.E LAW & ASSOCIATES**
4 **A Professional Law Corporation**
5 800 W. 1st Street, Suite 400
6 Los Angeles, California 90012
7 Tel: (213) 620-7070
8 Email: info@aoelaw.com

9 Attorneys for Debtors and Debtors-in-Possession,
10 Lucky Number Seven, Inc.

11 **UNITED STATES BANKRUPTCY COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

13 In re:

14 **Lucky Number Seven, Inc.**

15 Debtor and Debtor-in-Possession.

16 Case No.: **2:24-bk-15263-VZ**

17 Chapter 11

18 **NOTICE OF MOTION AND HEARING**
19 **ON MOTION FOR ORDER:**

20 **(A) AUTHORIZING SALE OF REAL**
21 **PROPERTY LOCATED AT 188 WEST**
22 **BASE LINE STREET, SAN**
23 **BERNARDINO, CA 92410 FREE AND**
24 **CLEAR OF CLAIMS, LIENS,**
25 **ENCUMBERANCES, AND INTERESTS**
26 **PURSUANT TO 11 U.S.C §363;**

27 **(B) APPROVING THE FORM AND**
28 **MANNER OF NOTICE AND BID**
PROCESS

Date: **December 10, 2024**

Time: **11:00 a.m.**

Ctrm: 1368

255 E. Temple St., Los Angeles, CA
90012

Judge: Hon. Vincent P. Zurzolo

29 **TO (A) DEBTOR, (B) OFFICE OF THE UNITED STATES TRUSTEE (C) ALL**
30 **SECURED CREDITORS OF THE ESTATE AND PERSONS HAVING FILED PROOFS**
31 **OF CLAIMS, (D) ALL PERSONS REQUESTING SPECIAL NOTICE, (E) ALL LIEN**
32 **HOLDERS OF RECORD FOR THE BASE LINE PROPERTY, (F) THE BUYER, AND**

1 **(G) OTHER PARTIES IN INTEREST, AND THEIR RESPECTIVE ATTORNEYS OF**
2 **RECORD, IF ANY:**

3 **NOTICE IS HERBY GIVEN** that, on **December 10, 2024 on the 11:00 a.m. calendar,**
4 in Courtroom 1368 of the United States Bankruptcy Court located at 255 E. Temple Street, Los
5 Angeles, CA 90012, the Honorable Vincent P. Zurzolo, United States Bankruptcy Judge
6 presiding, will conduct a hearing on the *Motion for order: (A) Authorizing the Sale of Real*
7 *Property Located at 188 W. Base Line Street, San Bernardino, CA 92410 (“Base Line*
8 *Property”) Free And Clear Of Claims, Liens, Encumbrances, And Interests Pursuant To 11*
9 *U.S.C §363;(B) Approving The Form And Manner Of Notice And Bid Process; Memorandum Of*
10 *Points And Authorities; Declarations Of Micaiah Barber And Ramona Rodriguez Mendez In*
11 *Support Thereof; And Exhibits* (hereinafter “Motion”) filed by Lucky Number Seven, Inc.,
12 Debtor and Debtor in Possession (hereinafter “Debtor”) in the above captioned bankruptcy case
13 (hereinafter “Case”). Specifically, through this *Motion*, the Debtor respectfully moves this Court
14 for an entry of an order that does all of the following:

15 (1). Grants the *Motion* and enters an *Order* in substantially the form attached hereto as
16 **Exhibit 10.**

17 (2). Approves the overbid process as set forth in the *Motion*.

18 (3). Approves the Commercial Purchase Agreement and Amendment of Existing
19 Agreement (collectively “Commercial Purchase Agreement”) entered into between the Debtor
20 and Naro Togap Sihombing, as Buyer, and attached to this *Motion* as **Exhibit 1.**

21 (4). Pursuant to Section 363(b) of the Bankruptcy code, authorizes, directs and empowers
22 the Debtor to take any and all necessary actions and reasonable steps to consummate the sale of
23 the Base Line Property to Naro Togap Sihombing, or to a successful overbidder, (in either case,
24 as applicable, the “Buyer”), for at least **\$290,000.00** of the real property commonly known as
25 **188 West Base Line Street, San Bernardino, CA 92410** (hereinafter “Base Line Property”),
26 APN;

27 **0146-222-18-000** and legally described as:
28

1 Lot 2, Platt Burton Subdivision, in the City of San Bernardino, County of San Bernardino, State
2 of California, as per Map recorded in Book 18, Page 53 of Maps, in the Office of the County
3 recorder of said County.

4 (5). Determines that adequate notice of hearing on the *Motion* was given and approves the
5 overbid procedure described in the *Motion*

6 (6). Authorizing the payment through escrow all usual and customary costs of sale,
7 including (a) broker's commission (b) escrow charges, (c) title charges, (d) recording & transfer
8 charges, (e) messenger fees; (f) payoffs to lienholders; (g) administrative fees to A.O.E. Law &
9 Associates subject to Court approval; (h) other miscellaneous charges and to the extent of
10 available funds, in each to the extent not disputed by the Debtors.

11 (7). Compelling all holders of liens and encumbrances, if any, to execute any and all
12 documentation that may be required to allow escrow to close;

13 (8). Authorizing the payment through escrow, the undisputed amounts of the liens and any
14 and all taxing authorities which includes, (i) the lien of Enterprise Bank & Trust, and its
15 successors and/or assigns ("EBT") in the approximate amount of \$190,369.34; (ii) a tax lien in
16 favor of the Internal Revenue Service tax lien ("IRS Lien") in the approximate amount of
17 \$25,732.17; (iii) a tax lien in favor of the State of California Department of Tax and Fee
18 Administrations ("State Tax Lien") in the approximate amount of \$3,882.11; (iv) a lien in favor
19 of the City of San Bernardino in the approximate amount of \$560.00; (v) a lien in favor of the
20 San Bernardino County Tax Collector ("Property Tax Lien") in the approximate amount of
21 \$26,808.63.

22 (9). Determines that the Commercial Purchase Agreement was entered into in good faith, in
23 an arm's length transaction and that the Buyer is acting in good faith within the meaning of 11
24 U.S.C. §363(m).

1 (10). Determines that the terms and provisions of the *Order* on the *Motion* shall be binding
2 in all respects upon the Buyer, the Debtor, the Estate, all creditors and interest holders of the
3 Debtor and the Estate, all parties having received notice of the *Motion*, and all interested parties,
4 and their respective successors and assigns, including, but not limited to any creditor asserting a
5 lien, claim, or other interest in the Base Line Property.
6

7 (11). Determines that a certified copy of the *Order* on the *Motion* may be filed with the
8 appropriate clerk and/or recorded with the county recorder to evidence conclusively the release
9 or cancellation of the claims, liens, and interests as set forth in that *Order*.

10 (12). Determines that the *Order* on the *Motion* may be presented to and shall be binding
11 upon and govern the acts of all persons and entities, including, without limitation, all filing
12 agents, filing officers, title agents, title companies, escrow agents, recorders of mortgages,
13 recorders of deeds, registrars of deeds, administrative agencies, federal, state and local
14 governmental agencies or departments, secretaries of state, federal and local officials, and all
15 other persons and entities who may be required by operation of law, the duties of their office, or
16 contract, to accept, file, register or otherwise record or release any documents or instruments, or
17 who may be required to report or insure any title or state of title in or to any property; and directs
18 each of the foregoing persons and entities to accept for filing any and all of the documents and
19 instruments necessary and appropriate to consummate the transactions contemplated by the
20 Commercial Purchase Agreement and accepted by the Seller and Buyer.
21

22 (13). Authorizes the title company insuring the Debtor's sale of the Base Line Property and
23 the escrow agent for such sale, to be entitled to rely upon the *Order* on the *Motion* in connection
24 with the sale.
25

26 (14). Determines that the fourteen (14) day stay period set forth in Federal Rule of
27 Bankruptcy Procedure 6004(h) is waived; and notwithstanding Federal Rule of Bankruptcy
28

1 Procedure 6004(h), the *Order* on the *Motion* shall be immediately effective and enforceable upon
2 its entry and there shall be no stay of the *Order* on the *Motion*.

3 (15). Granting such other and further relief as the Court deems just and proper under the
4 circumstances.

5 **NOTICE IS FURTHER GIVEN** that the Motion is made pursuant to 11 U.S.C.
6 §§ 363(b) and 363(m), Federal Rules of Bankruptcy Procedure 2002 and 6004, and Local
7 Bankruptcy Rules 6004-1 and 9013-1 on the grounds that the proposed sale of the Base Line
8 Property is in the best interests of the Estate in that the sale will maximize the value of the Base
9 Line Property for the benefit of the Estate's creditors.

10 **NOTICE IS FURTHER GIVEN** that the Motion is based upon (a) this *Notice of Motion*;
11 (b) the attached *Memorandum of Points and Authorities, Declarations of Micaiah Barber and*
12 *Ramona Rodriguez Mendez* and *Exhibits*; (c) the concurrently filed *Notice of Motion and*
13 *Hearing on Motion*; (d) the pleadings on file with the Court of which the Court is requested to
14 take judicial notice; and (e) such further evidence that may be properly submitted prior to or at
15 the hearing on the *Motion*. At your own expense, you may obtain a complete copy of the *Motion*
16 from the Court's file. You may also obtain a free electronic copy of the *Motion* by requesting a
17 copy from Debtor's Counsel, whose contact information is A.O.E. Law & Associates, APC,
18 Attn; Anthony O. Egbase, Esq., email: info@aoelaw.com, tel. 212-620-7070, 800 W. 1st Street,
19 Suite 400, Los Angeles, CA 90012.

20 **NOTICE IS FURTHER GIVEN that, pursuant to Local Bankruptcy Rule 9013-1(f),**
21 **any opposition to the Motion must be in writing; must be filed with the Court and served**
22 **upon the Office of the United States Trustee, the Debtor and the Debtor's attorney of**
23 **record at the addresses set forth below not later than 14 days before the hearing on the**
24 **Motion; and must include a complete written statement of all reasons in opposition thereto**
25

1 or in support or joinder thereof, declarations and copies of all photographs and
2 documentary evidence on which the responding party intends to rely, and any responding
3 memorandum of points and authorities:

4
5
6 **For Filing with the Court:**
Clerk's Office
7 United States Bankruptcy Court
255 E. Temple Street
8 Los Angeles, CA 90012

For Service on the U.S. Trustee
Office of the U.S. Trustee
915 Wilshire Blvd., Suite 1850
Los Angeles, CA 90017

9 **For Service on the Debtor:**
Lucky Number Seven, Inc.
10 5225 Canyon Crest Dr., Ste. 71-249
11 Riverside, CA 92507

For Service on Debtors' Attorney
Anthony O. Egbase
A.O.E. Law & Associates, APC
800 W. 1st Street, Suite 400
Los Angeles, CA 90012

12 **NOTICE IS FURTHER GIVEN that, pursuant to Local Bankruptcy Rule 9013-1(h),**
13 **failure to timely file and serve an objection may be deemed by the Court to be consent to**
14 **granting the relief requested in the *Motion*.**

15
16 Dated: November 15, 2024

A.O.E. Law & Associates, APC

17
18
19 By: /s/ Anthony O. Egbase
Anthony O. Egbase
Attorney for Debtor
20 Lucky Number Seven, Inc.

In re: Lucky Number Seven, Inc. Debtor(s).	CHAPTER: 11 CASE NUMBER: 2:24-bk-15263-VZ
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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:
800 W. 1st Street, Suite 400
Los Angeles, CA 90012

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 **11/15/2024**, 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:

Anthony Obehi Egbase on behalf of Attorney A.O.E. Law & Associates, APC
info@aoelaw.com, sandy@ecf.inforuptcy.com; egbasear54561@notify.bestcase.com

Anthony Obehi Egbase on behalf of Debtor Lucky Number Seven, Inc.
info@aoelaw.com, sandy@ecf.inforuptcy.com; egbasear54561@notify.bestcase.com

Anne C Manalili on behalf of Creditor U.S. Small Business Administration
anne.manalili@sba.gov

Kelly L Morrison on behalf of U.S. Trustee United States Trustee (LA)
kelly.l.morrison@usdoj.gov

Tom Roddy Normandin on behalf of Attorney Nextgear Capital, Inc., a Delaware Corporation,
tnormandin@pnbd.com, cathyjones@pnbd.com

Timothy J Silverman on behalf of Creditor Enterprise Bank & Trust
tsilverman@scheerlawgroup.com, tsilverman1@ecf.courtdrive.com

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

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On **11/15/2024**, 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.

Debtor, Secured Creditors, 20 Largest Unsecured Creditors, and All Interested Parties

Judge Copy:
Hon. Vincent P. Zurzolo, 255 E. Temple St., Suite 1360/Courtroom 1368, Los Angeles, CA 90012

Service information continued on attached page

In re: Lucky Number Seven, Inc. Debtor(s).	CHAPTER 11 CASE NUMBER 2:24-bk-15263-VZ
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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 11/15/2024, 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.

Ramona Rodriguez Mendez via Email
Real Estate Broker – Coldwell Banker Top Team
Email: rrm@cbtopteamca.com

Naro Togap Sihombing via Email
Buyer
Email: sihombingtogap@yahoo.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.

11/15/2024
Date

Jose Flores
Printed Name

/s/ Jose Flores
Signature

0973-2
Case 2:24-bk-15263-VZ
Central District of California
Los Angeles
Fri Jul 5 12:02:57 PDT 2024

5225 Canyon Crest Dr., Ste 71-249
Riverside, CA 92507-6301

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

County of San Bernardino (Property)
268 W Hospitality Ln First Floor
San Bernardino, CA 92408-3202

EIDL
14925 Kingsport Road
Fort Worth, TX 76155-2243

Enterprise Bank and Trust
11939 Rancho Bernardo Rd., STE 200
San Diego, CA 92128-2075

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

Micaiah James Ernest Barber
5225 Canyon Crest Dr. STE 71-249
Riverside, CA 92507-6301

NextGear Capital, Inc.
11799 North College Avenue
Carmel, IN 46032-5605

Pacific Premier Bank
17901 Von Karman Ave Suite 1200
Irvine, CA 92614-5248

State Board of Equalization
3737 Main Street, STE 1000
Riverside, CA 92501-3395

United States Attorney s Office
Federal Building, Room 7516
300 North Los Angeles Street
Los Angeles, CA 90012-3336

United States Department of Justice
Ben Franklin Station
P. O. Box 683
Washington, DC 20044-0683

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

Anthony Obehi Egbase
A.O.E LAW & ASSOCIATES
Bunker Hills Towers
800 W. 1st Street
Suite 400
Los Angeles, CA 90012-2479

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

(d)Enterprise Bank and Trust
11939 Rancho Bernardo Rd., STE. 200
San Diego, CA 92128-2075

(u)Internal Revenue Services

End of Label Matrix
Mailable recipients 15
Bypassed recipients 2
Total 17