

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Roksana D. Moradi-Brovia (Bar No. 266572) W. Sloan Youkstetter (Bar No. 296681) RHM LAW LLP 17609 Ventura Blvd., Suite 314 Encino, CA 91316 Telephone: (818) 285-0100 Facsimile: (818) 855-7013 roksana@RHMFirm.com sloan@RHMFirm.com <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Debtor	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: PACIFIC RADIO EXCHANGE, INC., Debtor(s).	CASE NO.: 2:25-bk-16614-VZ CHAPTER: 11 NOTICE OF SALE OF ESTATE PROPERTY

Sale Date: 01/06/2026	Time: 11:00 am
Location: Courtroom 1368, 255 E. Temple Street, Los Angeles, CA 90012	

Type of Sale: ☐ Public ☒ Private

Last date to file objections: 12/23/2025

Description of property to be sold:

See attached "Exhibit A."

Terms and conditions of sale:

The Subject Property will be sold "as is, where is," with no warranties or representations of any kind whatsoever.

Proposed sale price: \$ 725,000.00

Overbid procedure (*if any*):

None.

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

January 6, 2026, at 11:00 a.m.

Courtroom 1368, 255 E. Temple Street, Los Angeles, CA 90012

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

Roksana D. Moradi-Brovia | RHM LAW LLP
17609 Ventura Boulevard, Suite 314, Encino, CA 91316
Telephone: (818) 285-0100
Email: roksana@RHMFirm.com

Date: 12/15/2025

EXHIBIT “A”

Description of Property to be Sold

The Debtor seeks to sell substantially all of its assets (the “Purchased Assets”) to Filmtools Inc. (the “Buyer”) for \$725,000 (the “Purchased Price”). Attached as Exhibit “A” to the *Motion for Order Authorizing Sale of Substantially All of the Debtor’s Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests* [Docket No. 91] to and incorporated herein is the Asset Purchase Agreement (“the “APA”).

Pursuant to the APA, the assets to be sold are the following:

- (1) All rights of the Debtor under the contracts that are set forth in the APA (the “Assumed Contracts”).
- (2) All cash, cash equivalents and similar cash items in cash registers, safes, strongboxes, lock boxes and bank and brokerage accounts on the closing date (after payment of all administrative expenses in the Bankruptcy Case).
- (3) All accounts receivable and all claims against third parties related to the collectability thereof.
- (4) All inventory.
- (5) All tangible personal property, including all machinery, equipment, tools, point of sale systems, computers, mobile phones, personal digital assistants, computer equipment, hardware, peripherals, information technology infrastructure, telephone systems, furniture, fixtures, furnishings, office supplies, production supplies, other miscellaneous supplies and other tangible personal property of any kind owned by the Debtor (including any of the foregoing property that is subject to a capital lease, but only to the extent that the Buyer assumes such capital lease as an assigned contract).
- (6) All insurance policies relating to the business, all claims arising under such policies, and all credits, premium refunds, proceeds, causes of action or rights thereunder, including, without limitation, any condemnation proceedings affecting the purchased assets and warranty claims against third

parties arising with respect to the purchased assets.

- (7) All permits (in each case to the extent transferable, regardless of the length of the process necessary to effect such a transfer).
- (8) All intellectual property rights, including the items set forth in the APA and all indoor and outdoor signage, advertising, promotional materials, décor, pieces, accents and artwork or decorations.
- (9) All cars, trucks, forklifts, other industrial vehicles and other motor vehicles set forth in the APA.
- (10) All utility deposits, security deposits and other deposits held by vendors or trade creditors, and all deposits held by the counterparties to any assigned contracts (other than the security deposit held by the landlord under the real property lease (the “Landlord”)).
- (11) All improvements.
- (12) All rights to the telephone and facsimile numbers and e-mail addresses used by the Debtor.
- (13) All books, records, files and papers of the Debtor relating to (i) the business except to the extent the same constitute the excluded assets, (ii) the purchased assets, including equipment logs, operating guides and manuals, creative materials, advertising materials, promotional materials, studies, reports, correspondence, financial and accounting records, tax records and other similar documents and records (all in the state in which such records and information currently exist), or (iii) the employees of the business, provided that the Debtor shall be entitled to retain copies of such books, records, files and papers.
- (14) Any tax refund or reimbursement due to the Debtor or its affiliates, including, without limitation, any net operating loss carryforwards, to the extent permitted under applicable law.

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:
17609 Ventura Boulevard, Suite 314, Encino, CA 91316

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)* 12/15/2025, 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)* 12/15/2025, 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)* 12/15/2025, 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.

Debtor's principal - not listed for privacy reasons

☐ 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.

12/15/2025 Gabriela Hansen
Date *Printed Name*

/s/ Gabriela Hansen
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) [CONTINUED]:

- Counsel for American Express National Bank: Jonathan Arias bknotices@zwickerpc.com
- Counsel for ADP TotalSource, Inc.: Samuel Mushegh Boyamian samuel@marguliesfaithlaw.com, Angela@MarguliesFaithLaw.com; Vicky@MarguliesFaithLaw.com; Amber@MarguliesFaithLaw.com
- **Jeremy Faith** Jeremy@MarguliesFaithlaw.com, Angela@MarguliesFaithLaw.com; Vicky@MarguliesFaithLaw.com; Amber@MarguliesFaithLaw.com
- Subchapter V Trustee: John-Patrick McGinnis Fritz (TR) jpfftrustee@lnbyg.com, jpf@trustesolutions.net
- Elan S Levey elan.levey@usdoj.gov, usacac.tax@usdoj.gov; caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- Counsel for Debtor: Roksana D. Moradi-Brovia Roksana@rhmfir.com, matt@rhmfir.com; russ@rhmfir.com; sloan@rhmfir.com; susie@rhmfir.com; priscilla@rhmfir.com; rebecca@rhmfir.com; rosario@rhmfir.com; gabriela@rhmfir.com; david@rhmfir.com
- Counsel for UST: Kelly L Morrison kelly.l.morrison@usdoj.gov
- Counsel for Debtor: Matthew D. Resnik matt@rhmfir.com, roksana@rhmfir.com; russ@rhmfir.com; sloan@rhmfir.com; susie@rhmfir.com; priscilla@rhmfir.com; rebecca@rhmfir.com; rosario@rhmfir.com; gabriela@rhmfir.com; david@rhmfir.com
- Counsel for Landlord, Vast RE/sources Ontario, LLC: Allan D Sarver ADS@asarverlaw.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL [CONTINUED]:

Honorable Vincent P. Zurzolo
United States Bankruptcy Court
255 E. Temple Street, Suite 1360
Los Angeles, CA 90012

Buyer:
Filmtools Inc.
1015 N. Hollywood Way
Burbank, California 91505

ALL SECURED CREDITORS OF THE ESTATE (other than those served via NEF):

Bankers Healthcare Group, LLC
201 Solar Street
Syracuse, NY 13204

MNR Capital Group LLC
7901 4th St. N Ste 7491
Saint Petersburg, FL 33702

Ershowsy Verstanding PLLC
290 Central Avenue, Ste. 109
Lawrence, NY 11559

California Dept. of Tax and Fee
Special Procedures Section MIC: 29
P.O. Box 942879
Sacramento, CA 94279

MNR Capital Group LLC
418 Broadway, #5133
Albany, NY 12207

U.S. Small Business Administration
Office of General Counsel
312 N. Spring St., 5th FL
Los Angeles, CA 90012

Celtic Bank/OnDeck Capital
4700 W. Daybreak Pkwy, Suite 200
South Jordan, UT 84009

MNR Capital Group LLC
c/o Kaminski Law, PLLC
P.O. Box 247
Grass Lake, MI 49240

United First / Global Funding
2999 NE 191st Street, Unit 901
Miami, FL 33180

Launch Funding Group LLC
c/o Regain Group LLC
One Bridge Plaza North, Suite 868
Fort Lee, NJ 07024

Pathway Funding of Miami LLC
749 Gateway, Suite G-601
Abilene, TX 79602

WebBank
LoanBuilder/Swift Financial
c/o Foley & Lardner LLP
321 N. Clark Street
Chicago, IL 60654

Swift Funding California LLC

ALL PRIORITY CREDITORS OF THE ESTATE (other than those served via NEF):

Employment Development Dept.
Bankruptcy Group MIC 92E
PO Box 826880
Sacramento CA 94280-0000

Franchise Tax Board
Bankruptcy Section MS: A-340
P.O. Box 2952
Sacramento, CA 95812-2952

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

20 LARGEST CREDITORS + PARTIES FOR NOTICE (other than those served via NEF):

Amphenol RF 4 Old Newtown Road, Danbury CT 06810	TW1 4JR FedEx Corporate Services Inc 3965 Airways Blvd, Module G, 3rd Floor Memphis, TN 38116-5017	P.O. BOX 6386 Rockford, IL 61125-1386
Bank of America Business Card P O Box 15796 Wilmington, DE 19886-5796	Joseph Phillips 38 Oakmont Drive, Rancho Mirage, CA 92270	Radio Design Labs 659 6th St., Prescott, AZ 86301
Beach Wire and Cable Inc. 15881 Chemical Lane Huntington Beach, CA 92649	HAVE INC. 49 BENDER BLVD. Ghent, NY 12075	Rat Sound Systems, Inc. 486 Constitution Ave Camarillo, CA 93012
BELDEN WIRE & CABLE BELDEN INC. 28884 NETWORK PLACE Chicago, IL 60673-1288	Hosa Technology, Inc. 6650 Caballero Blvd., Buena Park, CA 90620	Rip-Tie, Inc. 883 San Leandro Blvd., San Leandro, CA 94577
Bill Me Later, Inc. PO Box 208703 Dallas, TX 75320	LEGRAND AV INC. 10900 Red Circle Drive, Minnetonka, MN 55343	Sommer Cable America c/o David & Jones LLC 3120 Sabre Dr., Suite 280 Southlake, TX 76092-2102
Burbank Water and Power PO Box 631 Burbank, CA 91503-0631	MARSHALL ELECTRONICS INC 20608 MADRONA AVE Torrance, CA 90503	TECNEC DISTRIBUTING 812 KINGS HIGHWAY P.O. BOX 397 Saugerties, NY 12477
CANARE CORPORATION OF AMERICA 45 COMMERCE WAY, UNIT C Totowa, NJ 07512	Masterworks Manufacturing Services 508 Shoreview Park Road, Shoreview, MN 55005	United First, LLC c/o Kaminski Law, PLLC P.O. Box 247 Grass Lake, MI 49240
CAPITAL ONE SPARK BUSINESS CREDIT P.O. BOX 60599 City of Industry, CA 91716-0599	MUXLAB INC. 2321 COHEN MONTREAL, QUEBEC H4R 2N7	VANCO INTERNATIONAL, LLC 506 KINGSLAND DRIVE Batavia, IL 60510
Cellco Partnership d/b/a Verizon Wireless William M Vermette 22001 Loudoun County PKWY Ashburn, VA 20147	NEUTRIK AMERICAS, INC. 4115 TAGGART CREEK RD. Charlotte, NC 28208	Vast RE/sources Ontario, LLC 4326 Forman Avenue, Toluca Lake, CA 91602
CITI BUSINESS AMERICAN AIRLINES PO BOX 790046 Saint Louis, MO 63179-0046	NEW GENIE GROUP dba GENIEGROUP 1612 WESTGATE CT SUITE 216 BRENTWOOD, TN 37027	WAVENET, INC. c/o Vericore LLC 10115 Kincey Avenue, Suite 100 Huntersville, NC 28078
CITI COSTCO P.O. BOX 78019 Phoenix, AZ 85062-8019	ODK Capital LLC 4700 W Daybreak Pkwy., Ste 200 South Jordan, UT 84009	WAVENET, INC. 707 E SEPULVEDA BLVD Carson, CA 90745
Clark Wire and Cable Co., Inc. 408 Washington Blvd., Unit A, Mundelein, IL 60060	ORS NASCO LLC 3706 SOLUTIONS CENTER Chicago, IL 60677-3007	WELLS FARGO BUSINESS CREDIT CARD PO BOX 77033 Minneapolis, MN 55480-7733
COAX CONNECTORS LTD. KORUS HOUSE 6-8 COLNE ROAD Twickenham, Middlesex, UK	PLATT LUGGAGE INC 9934 South Lowe Avenue Chicago, IL 60628	Wells Fargo Bank, N.A. PO Box 10438 MAC F8235-02F Des Moines IA 50306
	PHILMORE CARTER IND. INC	Zack Eletronics Inc 1075 Hamilton Road Duarte, CA 91010

RETURNED MAIL:

Beach Wire & Cable
15881 Chemical Lane
Wilmington, DE 19886-5796
(CORRECT ADDRESS ABOVE)

LEGRAND AV INC.
6436 CITY WEST PARKWAY
Eden Prairie, MN 55344
[New Address Above]