

|   |                    |
|---|--------------------|
| Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address<br><br>William P. Fennell (SBN 164210)<br>Of Counsel: Melissa A. Blackburn Joniaux (SBN 105470)<br>Of Counsel: Charles F. Bethel (SBN 126036)<br>LAW OFFICE OF WILLIAM P. FENNELL, APLC<br>401 West A Street, Suite 1800<br>San Diego, CA 92101<br>Tel: (619) 325-1560<br>Fax: (619) 325-1558<br><br><input type="checkbox"/> Individual appearing without attorney<br><input checked="" type="checkbox"/> Attorney for: Keeney Truck Lines, Inc., DIP | FOR COURT USE ONLY |
|---|--------------------|

|   |   |
|---|---|
| <b>UNITED STATES BANKRUPTCY COURT<br/>CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b> |   |
| In re:<br>Keeney Truck Lines, Inc.<br><br><br><br><br><br><br><br><br><br>Debtor(s).            | CASE NO.: 2:16-bk-26393-SK<br>CHAPTER: 11<br><br><br><br><br><br><br><br><br><br><b>NOTICE OF SALE OF ESTATE PROPERTY</b> |

|   |                       |
|---|-----------------------|
| <b>Sale Date:</b> 07/18/2017                            | <b>Time:</b> 11:00 am |
| <b>Location:</b> 3500 Fruitland Ave., Maywood, CA 90270 |                       |

**Type of Sale:** ☒ Public ☐ Private **Last date to file objections:** 07/11/2017

**Description of property to be sold:**

Two lots of diesel tractors, liquid- and dry-transfer trailers, misc. vehicles. Collectively designated as "Lots 2 and 4."  
Lists of all assets in Lots 2 and 4 are attached to this notice.

**Terms and conditions of sale:**

Lot 2 is to be sold to Flour Transport for \$350,000. This sale will be subject to overbid on the sale date.\*

Lot 4 is to be sold to TEC Equipment, Inc., for \$182,500. This sale will be subject to overbid on the sale date.\*

\*See Attachment for further conditions of sale.

**Proposed sale price:** \$ 532,500.00

**Overbid procedure (if any):**

Interested overbidders must post a deposit equal to 10% of the initial sale price, plus 5% of the initial overbid on each Lot for which they wish to bid. Bidding to go up in 5% increments.

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

July 13, 2017, 9:30 a.m., before the Honorable Sandra R. Klein, United States Bankruptcy Judge, Courtroom: 1575, United States Bankruptcy Court, Central District of California, 255 E. Temple Street, Los Angeles, CA 90012

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

Ken McCormack. AGES Professional Services and Associates, 743 El Cajon Blvd., El Cajon, CA 92020. 619-997-0176.  
ken@agespsa.com

Date: 06/22/2017

**ATTACHMENT TO NOTICE OF SALE OF ESTATE PROPERTY**

\*Debtor seeks a court order, pursuant to Section 363 of the Code, authorizing the sales of Lots 2 and 4 "free and clear" of any liens in this property. Section 363(f) authorizes the Debtor to sell.

Debtor is aware of the following liens:

1. Against the Property in Lot 2, specifically the 10 Freightliner tractors and the property in Lot 4, specifically, the 5 Volvo tractors, both are liened in favor of People's Capital and Leasing Company. **AS THE COURT MAY AUTHORIZE**, Debtor intends to sell Lot 2 and Lot 4 free and clear of all liens and encumbrances in favor of People's Capital. The liens and encumbrances of People's shall attach to the net sale proceeds with the same force, effect, validity and in the same priority as People's had those tractors from Lot 2 and Lot 4.
2. There is also a lien in favor of South Coast Air Quality Management District ("AQMD") on the the 10 Freightliners tractors in Lot 2. **AS THE COURT MAY AUTHORIZE**, Debtor intends to assume and assign the contract it made with the AQMD and thus sell 10 Freightliners tractors included in Lot 2 free and clear of liens. In the event that the Debtor is unable to obtain court authority to assume the AQMD Contract and to assign it to the successful bidder, Debtor intends to reject the AQMD Contract to sell these 10 Freightliners tractors, free and clear of liens any and all encumbrances resulting from a rejection of the AQMD Contract. AQMD's claim will attach to the net sale proceeds from Lot 2 with the same force, effect, validity and in the same priority as AQMD had those 10 tractors.

**AS THE COURT MAY AUTHORIZE**, Debtor will be transfer and convey to successful bidders, clean title to all assets in Lot 2 and Lot 4.

In order to qualify to bid at auction on July 18, 2017, prospective bidders must comply with Overbid Procedures as specifically set forth in Debtor's Motion. Which include but are not limited to the following:

Lot 2 – Flour Transport has offered \$350,000 for Lot 2 and the minimum overbid for the lot will be will be 5% higher (\$367,500).

Lot4 – TEC Equipment has offered \$182,500 for Lot 4 and the minimum overbid will be 5% higher (\$191,625).

Interested parties will be required also to 1) Provide deposits equal to 10% of the initial offered amounts for each Lot, plus the 5% initial overbid amount; and 2) Sign a Purchase and Sale Agreement in substantially the form as signed by these initial bidder for the Lot.

**All items included in Lot 2 and Lot 4 will be sold in an "as is" "where is" condition, no warranty is expressed or implied.**

Debtor seeks a court order approving the two proposed buyers or other successful bidder/buyer as a good faith purchaser entitled to the protections of 11 U.S.C. § 365(m).

**LOT 2**

Bid list for Keeney Rolling Stock  
TRACTOR LIST

| EQUIPMENT<br>NUMBER | LICENSE | YEAR | MAKE          | VIN               | TYPE    | DATE<br>PURCHASED | Bid Amount |
|---------------------|---------|------|---------------|-------------------|---------|-------------------|------------|
| 807                 | UP41356 | 2005 | INTERNATIONAL | 3HSCEAHR75N004284 | TRACTOR | 08/20/04          | \$5,000    |
| 808                 | UP41357 | 2005 | INTERNATIONAL | 3HSCEAHR95N004285 | TRACTOR | 08/20/04          | \$5,000    |
| 847                 | 9E97309 | 2013 | FREIGHTLINER  | 3AKJGBD49DSFE4277 | TRACTOR | 10/29/12          | \$31,000   |
| 848                 | 9E97310 | 2013 | FREIGHTLINER  | 3AKJGBD40DSFE4278 | TRACTOR | 10/29/12          | \$31,000   |
| 849                 | 9E97311 | 2013 | FREIGHTLINER  | 3AKJGBD42DSFE4279 | TRACTOR | 10/29/12          | \$31,000   |
| 850                 | 9E97312 | 2013 | FREIGHTLINER  | 3AKJGBD49DSFE4280 | TRACTOR | 10/29/12          | \$31,000   |
| 851                 | 9E97313 | 2013 | FREIGHTLINER  | 3AKJGBD40DSFE4281 | TRACTOR | 10/29/12          | \$31,000   |
| 852                 | 9E97314 | 2013 | FREIGHTLINER  | 3AKJGBD42DSFE4282 | TRACTOR | 10/29/12          | \$31,000   |
| 853                 | 9E97315 | 2013 | FREIGHTLINER  | 3AKJGBD44DSFE4283 | TRACTOR | 10/29/12          | \$31,000   |
| 854                 | 9E97316 | 2013 | FREIGHTLINER  | 3AKJGBD46DSFE4284 | TRACTOR | 10/29/12          | \$31,000   |
| 855                 | 9E97317 | 2013 | FREIGHTLINER  | 3AKJGBD48DSFE4285 | TRACTOR | 10/29/12          | \$31,000   |
| 856                 | 9E87930 | 2013 | FREIGHTLINER  | 3AKJGBD4XDSFE4286 | TRACTOR | 10/29/12          | \$31,000   |

TRAILER LIST

|     |         |      |             |                   |                 |          |      |
|-----|---------|------|-------------|-------------------|-----------------|----------|------|
| 223 | 1UN3080 | 1998 | FRUEHAUF    | 1H4V048227J023501 | VAN             | 02/01/88 | 2600 |
| 241 | 1US9375 | 1990 | FRUEHAUF    | 1H4V04828J011201  | VAN             | 09/21/89 | 2600 |
| 261 | 1VE8222 | 1993 | TRAILMOBILE | 1PT01JRH1P9006801 | VAN W/LIFT GATE | 01/27/93 | 4000 |
| 274 | 1VZ5822 | 1990 | GREAT DANE  | 1GRAA9626LS100701 | VAN W/LIFT GATE | 04/16/97 | 4000 |
| 275 | 1VZ5821 | 1990 | GREAT DANE  | 1GRAA962XLS100703 | VAN W/LIFT GATE | 04/16/97 | 4000 |
| 276 | 1VZ5823 | 1990 | GREAT DANE  | 1GRAA9621LS100704 | VAN W/LIFT GATE | 04/16/97 | 4000 |
| 289 | 1UV2285 | 1990 | MONON       | 1NNVF452XLM142022 | VAN W/LIFT GATE | 10/08/98 | 4000 |
| 364 | 4BD6568 | 2001 | TRAILMOBILE | 1PT01JRH719005849 | VAN             | 06/30/01 | 2600 |
| 365 | 4BD6567 | 2001 | TRAILMOBILE | 1PT01JRH318005850 | VAN             | 06/30/01 | 2600 |

\$350,000

**LOT 4**

## LOT 4

| EQUIPMENT<br>NUMBER | LICENSE | YEAR | MAKE  | VIN               | TYPE    | DATE<br>PURCHASED |
|---------------------|---------|------|-------|-------------------|---------|-------------------|
| 842                 | WP40764 | 2013 | VOLVO | 4V4NC9TH0DN131641 | TRACTOR | 04/30/12          |
| 843                 | WP40765 | 2013 | VOLVO | 4V4NC9TH2DN131642 | TRACTOR | 04/30/12          |
| 844                 | WP40766 | 2013 | VOLVO | 4V4NC9TH4DN131643 | TRACTOR | 04/30/12          |
| 845                 | WP40767 | 2013 | VOLVO | 4V4NC9TH6DN131644 | TRACTOR | 04/30/12          |
| 846                 | WP40768 | 2013 | VOLVO | 4V4NC9TH8DN131645 | TRACTOR | 04/30/12          |

## 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:  
**401 West A Street, Suite 1800, San Diego, CA 92101**

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 (*date*) **June 22, 2017**, 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:

Dare Law: dare.law@usdoj.gov

Nicholas Starkman: nstarkman@wkclegal.com, syoung@wkclegal.com

Marshall F Goldberg: mgoldberg@glassgoldberg.com

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

Valerie Smith: claims@recoverycorp.com

Amelia Puertas-Samara itcdbgc@edd.ca.gov, itcdgc@edd.ca.gov

Service information continued on attached page



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

On (*date*) **June 22, 2017**, 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.

Board of Trustees Teamsters Trust  
c/o Kathryn Halford, c/o Elizabeth Rosenfeld,  
c/o Nicholas I. Starkman  
16501 Ventura Blvd, #304, Encino, CA 91436  
*Request for Special Notice*

Hon. Sandra R. Klein  
United States Bankruptcy Court  
255 E. Temple Street, Suite 1582/  
Courtroom 1575 Los Angeles, CA 9001

☒ 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 \_\_\_\_\_, 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.

**06/22/2017**

*Date*

**Mariah Crabb**

*Printed Name*

**/s/ Mariah Crabb**

*Signature*



# ATTACHMENT TO PROOF OF SERVICE

**SEE NEXT PAGE**

Board of Trustees of the Teamsters and Food  
c/o Wohlner Kaplon Cutler Halford  
16501 Ventura Blvd., Suite 304  
Encino, CA 91436-2067

Keeney Truck Lines, Inc.  
3500 Fruitland Ave.  
Maywood, CA 90270-2008

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

American Express  
P.O. Box 297879  
Fort Lauderdale, FL 33329-7879

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

BNSF Railroad  
3110 Solutions Center  
Chicago, IL 60677-3001

BNSF Railway  
920 SE Quincy  
9th Floor  
Topeka, KS 66612-1116

BNSF Railway Company  
2500 Lou Menk Drive  
Forth Worth TX 76131-2828

Bandini Truck Term  
3152 Bandini Blvd.  
Los Angeles, CA 90058-4141

(p)BANK OF AMERICA  
PO BOX 982238  
EL PASO TX 79998-2238

Benny's Oil Filter & Recycling  
6040 Walker Ave.  
Maywood, CA 90270-3547

Betts Truck Parts & Service  
File 50413  
Los Angeles, CA 90074-0413

Board of Trustees Teamsters Trust  
c/o Wohlner Kaplon et al.  
16501 Ventura Blvd, #304  
Encino, CA 91436-2067

Broomall Trucking, Inc.  
3500 Fruitland Ave.  
Maywood, CA 90270-2008

Budget Uniform Rental Supply  
Stephen P Shrager  
1702 W. 134th Street  
Gardena, CA 90249-2016

Cecil Reyes  
7927 E. Arroyo Avenue  
Rosemead, CA 91770-4152

Charles E. Randmel  
441 Calle Borrego  
Walnut, CA 91789-1705

Commercial Tire  
P.O. Box 58707  
Los Angeles, CA 90058-0707

Cummins  
PO Box 848731  
Los Angeles, CA 90084-8731

Dan Hubbard  
3500 Fruitland Ave.  
Maywood, CA 90270-2008

Dan and Madeline Keeney Residual Trust  
Karyl K Hubbard, tte  
824 Pan Vista Dr  
Omak WA 98841-9381

De La Rosa Office Cleaning  
9631 Senwood Street  
Bellflower, CA 90706-2339

Econoline Portable Restrooms  
631 N Bristol St #65  
Santa Ana, CA 92703-2182

Eloy Adame  
5651 Via Corona Street  
Los Angeles, CA 90022-2801

Employment Development Department  
Bankruptcy Group MIC 92E, PO BOX 826880  
Sacramento, CA 95814

Fleetpride  
P.O. Box 847118  
Dallas, TX 75284-7118

Food Express  
521 North First Avenue  
Arcadia, CA 91006-2858

Fulgencio Bonilla  
1226 E. Louisa Avenue  
West Covina, CA 91790-1348

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Industrial Fumigant  
PO Box 844290  
Dallas, TX 75284-4290

Inland Kenworth, Inc.  
1600 W. Washington Blvd.  
Montebello, CA 90640-5422

7327 Whittier Avenue  
Whittier, CA 90602-1132

Interstate Filter Services  
15006 E Arrow Hwy  
Baldwin Park, CA 91706-1825

J. Calvin De Jager  
18461 Old River Road  
Bakersfield, CA 93311-9765

JDS Tank Testing & Repair  
P.O. Box 1241  
Stanton, CA 90680-1241

James Stout  
1064 Westbrook Street  
Corona, CA 92880-1215

John Johnson  
3456 Maryland Avenue  
Baldwin Park, CA 91706-5518

Johnson Hardware  
3600 E. Slauson Avenue  
Maywood, CA 90270-2697

Julian Lugo  
12435 Nordesta Drive  
Norwalk, CA 90650-8021

Keeney Family Trust  
824 Pan Vista Dr.  
Omak, WA 98841-9381

Konica Minolta  
PO Box 31001-0273  
Pasadena, CA 91110-0273

Kyle Degough  
11210 Forbes Avenue  
Granada Hills, CA 91344-4233

Little John, Inc.  
PO Box 5177  
Spartanburg, SC 29304-5177

MCI  
PO Box 15043  
Albany, NY 12212-5043

ML Bernie  
2245 First Street #211A  
Simi Valley, CA 93065-0905

Manuel D. Reyes  
301 N Nora Avenue  
West Covina, CA 91790-1500

Marlin Business Bank  
300 Fellowship Road  
Mount Laurel, New Jersey 08054-1201  
Attn.: Bankruptcy Department

Marlin Business Bank  
P.O. Box 13604  
Philadelphia, PA 19101-3604

Matheson Tri-Gas/Sims Welding  
Dept LA 23793  
Pasadena, CA 91185-3793

Mervin L. Heuseveldt  
12224 Torrey Pines Drive  
Auburn, CA 95602-8103

Mike Evans  
1604 Luray Street  
Long Beach, CA 90807-1220

Nationwide Carrier Services  
Licensing  
1304 West Whittier Blvd.  
Montebello, CA 90640-4601

Northwest Administrators, Inc.  
c/o Reid, McCarthy, Ballew & Leahy  
100 W. Harrison St., Suite 300  
Seattle, WA 98119-4116

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Pallets Plus, Inc.  
3500 Fruitland Ave.  
Maywood, CA 90270-2008

Parts Boys  
3400 Fruitland Avenue  
Maywood, CA 90270-2007

People's Capital and Leasing  
255 Bank St., 4th Floor  
Waterbury, CT 06702-2228

Pitney Bowes Financial Service  
PO Box 371887  
Pittsburgh, PA 15250-7887

Polar  
7600 East Sam Houston Parkway N  
Houston, TX 77049-3000

Reid, McCarthy, Ballew & Leany LLP  
100 West Harrison Street  
North Tower, Suite 300  
Seattle, WA 98119-4116

Robert Hubbard  
3500 Fruitland Ave.  
Maywood, CA 90270-2008

Robert W. Bollar, Esq.  
1800 W. Katella Ave., #400  
Orange, CA 92867-3449

Sherry Bechtel  
2357 S. Lakeshore Drive  
Pacific, MO 63069-4655

South Coast Air Quality Mgmt Dist  
Attn: Goods Mvt Cont  
Admin Tech Adv  
21865 Copley Dr  
Diamond Bar, CA 91765-4178

Southern Counties Lubricants, LLC  
1800 W. Katella Ave, Ste. 400  
Orange, CA 92867-3449

Southern Counties Oil Co.  
dba SC Fuels  
P.O. Box 4159  
Orange, CA 92863-4159

Sparkletts  
PO Box 7126  
Pasadena, CA 91109

(p)SPRINT NEXTEL CORRESPONDENCE  
ATTN BANKRUPTCY DEPT  
PO BOX 7949  
OVERLAND PARK KS 66207-0949

Stacy Medical Center  
PO Box 57829  
Sherman Oaks, CA 91413-2829

Staples Credit Plan  
Dept. 51-7811110740  
PO Box 78004  
Phoenix, AZ 85062-8004

TEC  
P.O. Box 11272  
Portland, OR 97211-0272

Teamsters & Food Employers  
Security Trust Fund  
PO Box 8262  
Pasadena, CA 91109-8262

Teamsters and Food Employers Security Trust  
Kathryn J. Halford; Nicholas I. Starkman  
Wohlner Kaplon Cutler Halford Rosenfeld  
16501 Ventura Bl., #304  
Encino, CA 91436-2067

Telepacific Communications  
PO Box 509013  
San Diego, CA 92150-9013

The Los Angeles Junction Rail  
3110 Solutions Center  
Chicago, IL 60677-3001

Truck PRO/PTO Sales  
29787 Network Place  
Chicago, IL 60673-1787

Truck Specialty  
4019 E. 52nd Street  
Maywood, CA 90270-2290

(p)U S TELEPACIFIC CORP  
OFFICE OF THE GENERAL COUNSEL  
515 S FLOWER ST  
47TH FLOOR  
LOS ANGELES CA 90071-2208

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

United Towing Service Inc  
14949 Valley Blvd  
Fontana CA 92335-6282

United Towing Services  
PO Box 642  
Downey, CA 90241-0642

Walter L. Keeney  
521 North First Avenue  
Arcadia, CA 91006-2858

Wells Fargo Bank, N.A.  
Energy Product Company  
PO Box 202056  
Dallas, TX 75320-2056

Wells Fargo Vendor Financial Services LLC  
1010 Thomas Edison Blvd SW  
Cedar Rapids IA 52404-8247

Western Allied  
P.O. Box 3628  
Santa Fe Springs, CA 90670-1628

Western Conference of Teamsters  
Pension Trust Fund  
2323 Eastlake Aveue E  
Seattle, WA 98102-3963

Western Conference of Teamsters  
Pension Trust Fund  
PO Box 841131  
Los Angeles, CA 90084-1131

Western Conference of Teamsters  
Pension Trust Fund  
Russell J Reid, Reid, McCarthy, Ballew & Le  
100 West Harrison Street N Tower #3  
Seattle WA 98119-4116

Westrux  
P.O. Box 309  
Norwalk, CA 90651-0309

Case 2:16-bk-26393-SK

Doc 105 Filed 06/22/17 Entered 06/22/17 19:04:50 Desc  
Main Document Page 13 of 13  
Zamora Lawn Services  
1650 Lagoon Avenue  
Wilmington, CA 90744-1340

Amelia Puertas-Samara  
Employment Development Department  
PO Box 826880  
Sacramento, CA 94280-0001

People's Capital and Leasing  
c/o M. Goldberg  
21600 Oxnard Street, Suite 320  
Woodland Hills, CA 91367-5095