Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address	FOR COURT USE ONLY			
TIMOTHY J. YOO (State Bar No. 155531)				
DANIEL H. REISS (State Bar No. 150573) LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.				
2818 S. La Cienega Ave. Los Angeles, CA 90034				
Los Angeles, CA 90067				
Telephone: 310-229-1234				
Facsimile: 310-229-1244 Email: TJY@LNBYG.COM;DHR@LNBYG.COM				
 Individual appearing without attorney Attorney for: Sandra McBeth, Chapter 7 Trustee 				
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - NORTHERN DIVISION				
In re:	CASE NO.: 9:24-bk-10606-MB			
	CHAPTER: 7			
CALIFORNIA ASPHALT PRODUCTION, INC.,				
	NOTICE OF SALE OF ESTATE PROPERTY			
Debtor(s).				
Sala Data:	Timot			
Sale Date:	Time:			
Location:				
Type of Sale: Public Private Last date to file objections: 07/18/2025				
Description of property to be sold:				
See annexed NOTICE OF MOTION AND MOTION FOR ENTRY OF AN ORDER (I) APPROVING SALE OF DEBTOR'S				
ASSETS FREE AND CLEAR OF LIENS, CLAIMS, INTERESTS, AND ENCUMBRANCES (II) VALUING ASSETS AND SECURED CLAIM OF CAP RESOLUTION PARTNERS, LLC, (III) AND GRANTING RELATED RELIEF (THE				
"MOTION").				
Terms and conditions of sale: See annexed MOTION.				
Deserved as la velación				
Proposed sale price:				

See annexed MOTION.

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

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Overbid procedure (if any): See annexed MOTION.

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

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

Date: 07/14/2025

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

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Cas	Main Document Page 3 of 16 Case 9:24-bk-10606-MB Doc 224 Filed 07/11/25 Entered 07/11/25 15:06:15 Desc Main Document Page 1 of 13			
3	 DANIEL H. REISS (State Bar No. 150573) LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P. 2818 S. La Cienega Ave. Los Angeles, CA 90034 Los Angeles, CA 90067 Telephone: 310-229-1234 Facsimile: 310-229-1244 Email: TJY@LNBYG.COM;DHR@LNBYG.COM; Attorneys for Sandra McBeth, Chapter 7 Trustee UNITED STATES BANKRUPTCY COURT 			
9	NORTHER			
10	In re	Case No. 9:24-bk-10606-MB		
11 12	CALIFORNIA ASPHALT PRODUCTION,	Chapter 7		
13	INC., Debtor.	NOTICE OF MOTION AND MOTION FOR ENTRY OF AN ORDER (I) APPROVING		
14		SALE OF DEBTOR'S ASSETS FREE AND CLEAR OF LIENS, CLAIMS, INTERESTS,		
15		AND ENCUMBRANCES (II) VALUING ASSETS AND SECURED CLAIM OF CAP RESOLUTION PARTNERS, LLC, (III) AND		
16		GRANTING RELATED RELIEF		
17 18		[MEMORANDUM OF POINTS AND AUTHORITIES AND SUPPORTING DECLARATIONS CONCURRENTLY FILED HEREWITH]		
19		[11 U.S.C. §§ 363, 506; Fed. R. Bankr. P.		
20		6004, 3012]		
21		Date: August 1, 2025 Time: 11:30 a.m.		
22		Place: Ctrm 202 1415 State Street		
23 24		Santa Barbara, CA 93101		
24 25				
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TO THE HONORABLE MARTIN R. BARASH, UNITED STATES BANKRUPTCY JUDGE, THE UNITED STATES TRUSTEE AND ALL PARTIES IN INTEREST:

3 Sandra McBeth, the chapter 7 trustee (the "Trustee") in the above-captioned bankruptcy case of California Asphalt Production, Inc. (the "Debtor"), hereby moves (the 4 5 "Motion") pursuant to sections 105(a), 363 and 506 of Title 11 of the United States Code 6 (the "Bankruptcy Code") and Rules 2002, 3012, 6004, 6006, 9007, and 9008 of the Federal 7 Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for an order, in substantially the form of **Exhibit B** (the "Sale Order") annexed to the concurrently filed Memorandum Points 8 and Authorities, authorizing the sale of substantially all of the bankruptcy estate's real 9 property and personal property assets (the "Assets") free and clear of all liens and 10 11 encumbrances, and other related relief as set forth herein.

12 Pursuant to Local Bankruptcy Rule ("LBR") 6004-1(c)(3) the Trustee proposes to sell 13 the Assets to CAP Resolution Partners, LLC, a California limited liability company ("CAP **Resolution**"). The Assets to be sold and the terms of the sale are set forth fully in the 14 Purchase and Sale Agreement (the "**PSA**"), a copy of which is attached hereto as **Exhibit** 15 16 A to the concurrently filed Memorandum of Points and Authorities. In summary, the purchase price for the Assets consists of: (1) assumption of certain liabilities as set forth in 17 18 the PSA (the "Assumed Liabilities"), which includes the payment of \$72,355.59 representing the amount recoverable by the estate for avoidance of liens related to real 19 20 property tax penalties under 11 U.S.C. § 724(a); (2) a credit bid of \$6,500,000 of CAP 21 Resolution's first priority secured claim pursuant to Section 363(k)¹ and (3) a cash payment 22 of \$200,000 (the "Cash Payment"). The Cash Payment shall constitute a surcharge of CAP 23 Resolution's collateral securing its senior loan pursuant to Section 506(c) of the Bankruptcy 24 Code for the benefit of the estate. The Trustee is not seeking authority to pay any 25 commission in connection with this proposed sale.

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 ²⁷ ¹ Unless otherwise indicated, all statutory references herein shall be to the Bankruptcy
 28 Code.

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1 The Trustee is also seeking approval of a stipulation (the "Tax Stipulation") with CAP Resolution and Harry E. Hagen, Santa Barbara County Treasurer – Tax Collector (the "Tax 2 3 Collector") pursuant to Fed. R. Bankr. P. 9019 whereby CAP Resolution, among other things, agrees to pay to the Trustee, \$72,355,59, which represents the amount recoverable 4 5 by the estate for avoidance of liens related to real property tax penalties under 11 U.S.C. § 6 724(a) (the "**Tax Payment**"). The Trustee and CAP Resolution agree that the Tax Payment 7 is an Assumed Liability and therefore constitutes consideration for the proposed sale. A true copy of the Tax Stipulation is annexed to the concurrently filed Motion of Points and 8 9 Authorities as Exhibit E.

The Motion is based upon this Notice of Motion and Motion, the concurrently filed
Memorandum of Points and Authorities, the Declarations of Sandra McBeth, Charles W.
Moore, Bryan Seeley and Mark Moore filed concurrently herewith and the exhibits attached
thereto, the record in this case, such other and further evidence and argument as may be
presented to the Court at or before a hearing on this Motion.

PLEASE TAKE NOTICE that a hearing on the Motion shall take place before the
Honorable Martin R. Barash in Courtroom 202, 1415 State Street, Santa Barbara, CA 93101
on the Court's 11:30 a.m. calendar.

PLEASE TAKE FURTHER NOTICE that a copy of the Memorandum of Points and
Authorities, Declarations and related documents can be obtained upon written request to
counsel for the Trustee, whose contact information is provided in the upper left corner of
the first page of this Notice, or from the Court online through the PACER online portal.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Bankruptcy Rule 90131(f), any opposition to this Motion must be filed with the Clerk of the United States
Bankruptcy Court and served upon the United States Trustee as well as counsel for the
Trustee at the address located in the upper left-hand corner of the first page of this Notice
and Motion by no later than fourteen (14) days before the hearing on this Motion.

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PLEASE TAKE FURTHER NOTICE that, pursuant to LBR 9013-1(h), failure to
 timely file and serve a response to the Motion may be deemed by the Court to be consent
 to the relief requested herein.

WHEREFORE, the Trustee hereby moves the Court for an order in substantially theform for the Sale Order:

Authorizing the sale of the Assets to CAP Resolution free and clear of all liens,
 claims, interests and encumbrances pursuant to Sections 363(a) and (f), except as
 otherwise provided in the Tax Stipulation or otherwise;

9 2. Finding that CAP Resolution's interests are protected as a good faith
10 purchaser of the estate's assets pursuant to Section 363(m);

11 3. Finding that: (i) the value of the Assets is no greater than $6,700,000^2$ plus the Assumed Liabilities, (ii) CAP Resolution holds an allowed secured claim secured by a first 12 priority lien on the Assets in the amount of \$82,020,793.17 (the "CAP Resolution Senior 13 Lien") except as otherwise provided in the Tax Stipulation, (iii) the Specified Liens (as 14 defined in the PSA) are junior to CAP Resolution Senior Lien, (iv) the Specified Liens are 15 16 unsecured because the CAP Resolution Senior Lien exceeds the value of the Assets, (v) 17 the holders of Specified Liens do not have allowed secured claims under Section 506(a)(1), 18 and (vi) the Specified Liens are void under Section 506(d);

Finding the Cash Payment to be an appropriate surcharge against the Assets
 securing the CAP Resolution Senior Lien under Section 506(c), which surcharged amount
 and cash received by the estate therefrom shall be free and clear of the liens, interests or
 encumbrances of any creditor of this bankruptcy estate or other party in interest;

5. Approving the Tax Stipulation in all respects; and
5. Approving the Tax Stipulation in all respects; and
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² Consisting of CAP Resolution's \$6.5 million credit bid plus the \$200,000 Cash Payment.

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1	6. Granting such other and further relief as deemed appropriate by the Court.			
2				
3	Dated: July 11, 2025 SANDRA MCBETH, CHAPTER 7 TRUSTEE			
4	By: <u>/s/ Daniel H. Reiss</u>			
5	TIMOTHY J. YOO			
6	DANIEL H. REISS LEVENE, NEALE, BENDER, YOO			
7	& GOLUBCHIK L.L.P. Attorneys for Chapter 7 Trustee			
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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: 2818 La Cienega Avenue, Los Angeles, CA 90034.

A true and correct copy of the foregoing document entitled (*specify*): NOTICE OF MOTION AND MOTION FOR ENTRY OF AN ORDER (I) APPROVING SALE OF DEBTOR'S ASSETS FREE AND CLEAR OF LIENS, CLAIMS, INTERESTS, AND ENCUMBRANCES (II) VALUING ASSETS AND SECURED CLAIM OF CAP RESOLUTION PARTNERS, LLC, (III) AND GRANTING RELATED RELIEF 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. <u>TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)</u>: 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*) **July 11**, **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:

- William C Beall Will@BeallandBurkhardt.com, carissa@beallandburkhardt.com
- Matthew Bouslog mbouslog@allenmatkins.com, ncampos@allenmatkins.com
- Jeffrey D Cawdrey jcawdrey@grsm.com, madeyemo@gordonrees.com;asoto@grsm.com;amatthews@grsm.com
- Jacquelyn H Choi jacquelyn.Choi@rimonlaw.com, docketingsupport@rimonlaw.com
- Jeffrey I Golden jgolden@go2.law, kadele@ecf.courtdrive.com;cbmeeker@gmail.com;lbracken@wgllp.com;dfitzgerald@go2.law;golden.jeffreyi.b117 954@notify.bestcase.com
- Elizabeth Jones elizabeth.jones@doj.ca.gov
- Sandra McBeth (TR) jwalker@mcbethlegal.com, CA65@ecfcbis.com;ecf.alert+McBeth@titlexi.com
- Reed H Olmstead reed@olmstead.law, r41602@notify.bestcase.com
- Aram Ordubegian ordubegian.aram@arentfox.com
- Jennifer Richardson jrichardson@countyofsb.org
- Catherine Schlomann Robertson crobertson@spencerfane.com, cwilkison@spencerfane.com
- David B Shemano dshemano@shemanolaw.com
- Dara L Silveira dsilveira@kbkllp.com, cmitsuoka@kbkllp.com
- Annie Y Stoops annie.stoops@afslaw.com, yvonne.li@afslaw.com;mia.ferguson@afslaw.com
- United States Trustee (ND) ustpregion16.nd.ecf@usdoj.gov

2. <u>SERVED BY UNITED STATES MAIL</u>: On (*date*) <u>July 11, 2025</u>, 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 <u>will be completed</u> no later than 24 hours after the document is filed.

Service information continued on attached page

3. <u>SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served)</u>: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) <u>July 11, 2025</u>, 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 <u>will be completed</u> 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.

July 11, 2025 Date D. Woo Printed Name /s/ D. Woo Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Case 9:24-bk-10606-MB Label Matrix for local noticing 0973-9 Case 9:24-bk-10606-MB Central District of California Santa Barbara Fri Jul 11 10:38:33 PDT 2025

(p) DEPARTMENT OF TOXIC SUBSTANCES CONTROL ATTN OFFICE OF LEGAL COUNSEL 1001 I STREET SACRAMENTO CA 95814-2828

Levene, Neale, Bender, Yoo & Golubchik L.L.P 2818 La Cienega Avenue Los Angeles, CA 90034-2618

Alexa Solutions 1843 Veronica Ln Santa Maria, CA 93454-5514

American Insulation and Scaffolding 50566 Commeraial Cirle, Suite B Concord, CA 94520

Amerisource Funding, Inc. 7225 Langtry St, Ste 500 Houston, TX 77040-6676

Anthony J. Cota Egan Law 426 Barcellus Avenue, Suite 304 Santa Maria, CA 93454-6928

BP Energy 1010 N 500 E Ste 200 North Salt Lake, UT 84054-1952

Brad D. Krasnoff, Chapter 7 Trustee (Cat Can 1901 Avenue of the Stars, Suite 450 Los Angeles, CA 90067-6006

CDTFA PO Box 942879 Sacramento, CA 94279-0055 Doc 228 Filed 07/14/25 Entered 07/14/25 13:50:35 Desc Main Document Page 9 of 16

Doc 224 Filed 07/11/25 Entered 07/11/25 15:06:15 Desc Aviain Bocument^{inc.} Page 7 of 13 Spencer Fane LLP 225 West Santa Clara Street Suite 1500 San Jose, CA 95113-1752

Department of Planning and Development For t Development of Planning & Development County of Santa Barbara Errin Briggs 123 E. Anapamu Street Santa Barbara, CA 93101-2025

Northern Division 1415 State Street, Santa Barbara, CA 93101-2511

American Ag, Inc. PO Box 20370 Bakersfield, CA 93390-0370

American Insulation and Scaffolding 50566 Commercial Cirle, Suite B Concord, CA 94520

Amerisource Funding, Inc. Catherine Schlomann Robertson - Spencer 225 West Santa Clara Street, Suite 1500 San Jose, CA 95113-1752

Asphalt Pavement & Recycling Tech, Inc. 5207 Minter Field Ave Shafter, CA 93263-4024

Ben Flores Welding & Construction 20235 Hart Creek Dr Keene, CA 93531-1340

CAP Resolution Partners, LLC c/o Christopher A. Minier/ Jeffrey I. Go 3070 Bristol Street, Suite 640 Costa Mesa, CA 92626-3067

COMPUTER SOLUTIONS 1404 VIA ASUETO Santa Maria, CA 93454-2638 California Asphalt Production, Inc. 1660 Sinton Rd Santa Maria, CA 93458

Harry E. Hagen, Santa Barbara County Treasur P. O. Box 579 Santa Barbara, CA 93102-0579

AgTech PO Box 22058 Carmel, CA 93922-0058

American Industrial Scaffolding, Inc. Arlie G. Capps, Esq 111 D Street Wheatland, CA 95692-9221

Ameripride 1050 W Whitesbridge Ave Fresno, CA 93706-1328

Anthony Cota c/o M. Jude Egan, Esq. 426 Barcellus Ave., Suite 304 Santa Maria, CA 93454-6928

BC Laboratories Inc. 4100 Atlas Ct Bakersfield, CA 93308-4510

Big Red Crane Company Inc. 162 Baldwin Rd Ojai, CA 93023-3807

CDTFA PO Box 942879 Sacramenta, CA 94279-0055

Cain Trucking, Inc. 23004 Road 140 Tulare, CA 93274-9643

Case 9:24-bk-10606-MB Cain Trucking, Inc. 23004 Road 140 Tulare, CA 93274

California Department of Toxic Substances Co 1515 Clay Street Oakland, CA 94612-1499

Catherine Schlomann Robertson - Spencer Fane 225 West Santa Clara Street, Suite 1500 San Jose, CA 95113-1752

Central Coast Portables 237 Town Center West #203 Santa Maria, CA 93458-5075

Colonial Life PO Box 903 Columbia, SC 29202-0903

Constellation NewEnergy - Gas Division, LLC 1310 Point Street Baltimore, MD 21231-3380

Direct Energy Business Marketing 12 Greenway Plaz, suite 250 Houston, TX 77046-1211

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

FINANCIAL CREFIT NETWORK PO BOX 3084 VISALIA, CA 93278-3084

GIN, LLC 45 Rockefeller Plaza, Suite 2410 New York, NY 10111-2493

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California Dept. of Tax and Fee Administrati Collection Support Bureau, MIC:29 PO BOX 942879 Sacramento, CA 94279-0029

Central Coast Farming 208 N. Concord Ave Santa Maria, CA 93454-4710

Coast Fluid-Air. Inc. 547 West Betteravia Rd, Ste G Santa Maria, CA 93455-1245

Colonial Life PO Box 903 Columbia, SC 29202

County of Santa Barbara Planning and Development 624 West Foster Rd Santa Maria, CA 93455-3623

Diversified Project Service Internationa 5351 Olive Drive, Suite 100 Bakersfield, CA 93308-2926

Environmental Health Services PO Box 1489 San Luis Obispo, CA 93406-1489

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

GIT, Inc. 1700 Sinton Rd Santa Maria, CA 93458-9708 PO BOX 942872 Sacramento, CA 94271-2872

Catano Storage Tank Services 3103 Belle Terrace Bakersfield, CA 93304-4105

Central Coast Farming 208 N. Concord Ave Santa Mariaz CA 93454-4710

Coastal Copy Inc 849 Ward Drive Santa Barbara, CA 93111-2920

Constellation New Energy Gas Division PO Box 5473 Carol Stream, IL 60197-5473

Cube Accounting Solutions Inc. 5000 Birch Street Newport Beach, CA 92660-2140

Employment Development Department Bankruptcy Group MIC 92E P. O. Box 826880 Sacramento, CA 94280-0001

Evans Hydro, Inc 18128 S. Santa Fe Avenue Compton, CA 90221-5517

Franchise Tax Board Bankruptcy Section, MSL A-340 PO Box 2952 Sacramento, CA 95812-2952

GLR, LLC 45 Rockerfeller Plaza, Ste 2410 New York, NY 10111-2493

Case 9:24-bk-10606-MB

2617 E. Clark Avenue Santa Maria, CA 93455-5815

GRELAND

GTL, LLC 1700 Sinton Rd Santa Maria, CA 93458-9708

Globalstar PO Bax 30519 Los Angeles, CA 90030-0519

HVI Cat Canyon c/o Brad D Krasnoff, Chapter 7 Trustee 1901 Avenue of the Stars, Suite 450 Los Angeles, CA 90067-6006

Internal Revenue Service Centralized Insolvency Ops. PO Bax 7346 Philadelphia, PA 19101-7346

Laurel John Udden c/o Law Office of Michael N. Berke, APC 27433 Tourney Rd Ste 250 Valencia, CA 91355-5620

M P Environmental, Inc. 3400 Manor St. Bakersfield, CA 93308-1451

MPI OILFIELD SERVICES, LLC 12406 Tank Farm Rd. Taft, CA 93268-9600

Michael Doyle Reimbursement 25835 Rio Vista Dr. Fresno, CA 93723

O'Conner Pest Control 101 Cuyama Lane Nipomo, CA 93444-9758
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GTL1, LLC 1700 Stinton Rd Santa Maria, CA 93458-9708

Globalstar PO Box 30519 Los Angeles, CA 90030-0519

Harlan Felt PE Harlan Felt 2313 W 2200 S Syracuse, UT 84075-9278

Internal Revenue Service Centralized Insolvency Ops. PO Box 7346 Philadelphia, PA 19101-7346

Lauren John Udden, Client Trust Account 15 West Carrillo Street, Suite 101 Santa Barbara, CA 93101-8215

M. Jude Egan, Esq. 426 Barcellus Avenue, Suite 304 Santa Maria, CA 93454-6928

Manley's Boiler, LLC 401 S Grand Ave Santa Ana, CA 92705-4102

Midway Laboratory, Inc 315 Main St. Taft, CA 93268-3522

O'Conner Pest Control 101 Cuyama Lane Nipomo, CA 93444 Ginny Jost 118 Mesa Verde Lane Nipomo, CA 93444-9576

Guggenheim Corporate Funding, LLC 135 East 57th St New York, NY 10022-2050

Harry E. Hagen Treasurer-Tax Collector PO Box 579 Santa Barbara, CA 93102-0579

Larson O'Brien LLP 555 S. Flower St., 30th Fl. Los Angeles, CA 90071-2300

Law Office of Lauren John Udden 15 West Carrillo Street, Suite 101 Santa Barbara, CA 93101-8215

MP Environmental Services, Inc, 3400 Manor St Bakersfield, CA 93308-1451

Michael Doyle Reimbursement 25835 Ria Vista Dr. Fresno, CA 93723

Nationwide Boiler 42400 Christy St. Fremont, CA 94538-3141

Oil Price Informatian Service, LLC P.O. Box 9407 Gaithersburg, MD 20898-9407

Case 9:24-bk-10606-MB Oil Price Information Service, LLC P.O. Box 9407 Gaithersburg, MD 20898-9407

Pacific Petroleum Corporation PO Box 2646 Santa Maria, CA 93457-2646

ReadyRefresh P.O. Box 856158 Louisville, KY 40285-6158

Robert Brown Engineers 4952 Warner Ave Suit 217 Huntington Beach, CA 92649-5505

S & L Safety Products PO Box 7135 Los Osos, CA 93412-7135

Santa Barbara County APCD 260 N San Antonio Rd # A Santa Barbara, CA 93110-1315

Santa Barbara County P&D-B&S Department 123 East Anapamu Street Santa Barbara, CA 93101-2025

Santa Barbara County of Emergenay Mgt 4408 Cathedral Oaks Rd. Santa Barbara, CA 93110-1042

Smith MEP 1340 W Betteravia Road Santa Maria, CA 93455-1030

Southern California Gas Company PO Box C Monterey Park, CA 91754-0932

Doc 228 Filed 07/14/25 Entered 07/14/25 13:50:35 Desc Main Document Page 12 of 16

Doc 224 Filed 07/11/25 Entered 07/11/25 15:06:15 Desc Warr Document TRIC Page 10 of 13 PGEE PO Box 997300 STOCKTON CA 95208-0329

Precision Air Systems Inc 1660 Sinton Rd Santa Maria, CA 93458

Reetz, Fox & Bartlett LLP 116 E. Sola St. Santa Barbara, CA 93101-1933

Robert Half International 18757 Burbank Blvd, Ste 100 Tarzana, CA 91356-6328

Safety Kleen 5310 Overpass Rd. Santa Barbara, CA 93111-2008

Santa Barbara County Fire Department 4410 Cathedraal Oaks Road Santa Barbara, CA 93110-3105

Santa Barbara County P&D-Energy Dept. 123 East Anapamu Street Santa Barbara, CA 93101-2025

Santa Barbara County of Emergency Mgt 4408 Cathedral Oaks Rd. Santa Barbara, CA 93110-1042

SoCalGas P.O. Box 30337 Los Angeles, CA 90030-0337

State Water Resource Control Board SCP Program PO Box 1888 Sacramento, CA 95812-1888

Sacramento, CA 95899-7300

Price, Postel & Parma LLP PO Box 99 Santa Barbara, CA 93102-0099

Reetz, Fox & Bartlett LLP 116 E. Sola St. Santa Barbaraz CA 93101-1933

S & L Safety Products PO Bcx 7135 Los Osos, CA 93412-7135

Santa Barbara Caunty P&D-B&S Department 123 East Anapamu Street Santa Barbara, CA 93101

Santa Barbara County P&D-Accounting Unit 123 East Anapamu Stree Santa Barbara, CA 93101-2025

Santa Barbara County Public Health Dept 2125 S. Centerpointe Pkwy # 333 Santa Maria, CA 93455-1338

Santa Barbara Executive Office 105 E. Anapamu St. Santa Barbara, CA 93101-2063

South Coast Air Quality 21865 Copley Dr. Diamond Bar, CA 91765-4182

State of California Department of Justice PO Box 70550 Oakland, CA 94612-0550

Case 9:24-bk-10606-MB State of California-CALOSHA 1515 Clay Street, Suite 1901 Oakland, CA 94612-1423

The Law Offices of Alex W. Craigie 791 Via Manana Santa Barbara, CA 93108-1332

Waste Management P.O. Box 541065 Los Angeles, CA 90054-1065

Wilmington Savings Fund Society, FSB Todd C. Meyers, Eversheds Sutherland LLP The Grace Building, 40th Floor 1114 Avenue of the Americas New York, NY 10036-7703

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

PO Box 938

Wilmington Savings Fund Society, FSB 500 Delaware Ave Wilmington, DE 19801-1490

Reed H Olmstead Law Offices of Reed H. Olmstead 5142 Hollister Avenue #171 Santa Barbara, CA 93111-2526

Main Document Page 13 of 16 Doc 224 Filed 07/11/25 Entered 07/11/25 15:06:15 Desc Main WD fc unfeiten M Page 11 of 13 The Law Office of Susan M. Whalen, A Prof La PO Box 938 Los Olivos, CA 93441-0938 Los Olivos, CA 93441-0938

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Verizon Wireless P.O. Box 660108 Dallas, TX 75266-0108

Wilmington Savings Fund Society, FSB Todd C. Meyers Eversheds Sutherland (US) LLP 999 Peachtree St. NE, Suite 2300 Atlanta, GA 30309-3996

Sandra McBeth (TR) 7343 El Camino Real, #185 Atascadero, CA 93422-4697

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).

California Department of Toxic Substances Co DTSC Headquarters (Joe Serna Jr. CalEPA) 1001 I Street P.O. Box 806 Sacramento, CA 95814

PG&E PO BOX 8329 C/O BANKRUPTCY STOCKTON, CA 95208

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

(u) CAP Resolution Partners, LLC

(u) Courtesy NEF

(u) GLR, LLC, a Delaware limited liability com

(u) Wilmington Savings Fund Society, FSB

(d) Amerisource Funding, Inc. 7225 Langtry St, Ste 500 Houston, TX 77040-6676

(d) Asphalt Pavement & Recycling Tech, Inc. 5207 Minter Field Ave Shafter, CA 93263-4024

(d) BC Laboratories Inc. 4100 Atlas Ct Bakersfield, CA 93308-4510

(d) Anthony Cota c/o M. Jude Egan, Esq. 426 Barcellus Ave., Suite 304 Santa Maria, CA 93454-6928

(d) BP Energy 1010 N 500 E Ste 200 North Salt Lake, UT 84054-1952

Case 9:24-bk-10606-MB (d) Ben Flores Welding & Construction 20235 Hart Creek Dr Keene, CA 93531-1340

(d) Coast Fluid-Air. Inc. 547 West Betteravia Rd, Ste G Santa Maria, CA 93455-1245

(d) Diversified Project Service Internationa 5351 Olive Drive, Suite 100 Bakersfield, CA 93308-2926

(d)GIT, Inc. 1700 Sinton Rd Santa Maria, CA 93458-9708

(d) Ginny Jost 118 Mesa Verde Lane Nipomo, CA 93444-9576

(d) M P Environmental, Inc. 3400 Manor St. Bakersfield, CA 93308-1451

(d) Manley's Boiler, LLC 401 S Grand Ave Santa Ana, CA 92705-4102

(d) Pacific Petroleum Corporation PO Box 2646 Santa Maria, CA 93457-2646

(d) Robert Brown Engineers 4952 Warner Ave Suit 217 Huntington Beach, CA 92649-5505

(d) Santa Barbara County P&D-Accounting Unit 123 East Anapamu Stree Santa Barbara, CA 93101-2025

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(d) Constellation New Energy Gas Division PO Box 5473 Carol Stream, IL 60197-5473

(d) Employment Development Department Bankruptcy Group MIC 92E P. O. Box 826880 Sacramento, CA 94280-0001

(d)GLR, LLC 45 Rockerfeller Plaza, Ste 2410 New York, NY 10111-2493

(d) Larson O'Brien LLP 555 S. Flower St., 30th Fl. Los Angeles, CA 90071-2300

(d) MP Environmental Services, Inc, 3400 Manor St Bakersfield, CA 93308-1451

(d) Midway Laboratory, Inc 315 Main St. Taft, CA 93268-3522

(d)Precision Air Systems Inc 1660 Sinton Rd Santa Maria, CA 93458

(d) Robert Half International 18757 Burbank Blvd, Ste 100 Tarzana, CA 91356-6328

(d) Santa Barbara County Public Health Dept 2125 S. Centerpointe Pkwy # 333 Santa Maria, CA 93455-1338

(d) Central Coast Portables 237 Town Center West #203 Santa Maria, CA 93458-5075

(d) Cube Accounting Solutions Inc. 5000 Birch Street Newport Beach, CA 92660-2140

(d)GIN, LLC 45 Rockefeller Plaza, Suite 2410 New York, NY 10111-2493

(d)GTL1, LLC 1700 Stinton Rd Santa Maria, CA 93458-9708

(d) Laurel John Udden c/o Law Office of Michael N. Berke, APC 27433 Tourney Rd Ste 250 Valencia, CA 91355-5620

(d) MPI OILFIELD SERVICES, LLC 12406 Tank Farm Rd. Taft, CA 93268-9600

(d) Nationwide Boiler 42400 Christy St. Fremont, CA 94538-3141

(d) Price, Postel & Parma LLP PO Box 99 Santa Barbara, CA 93102-0099

(d) Santa Barbara County APCD 260 N San Antonio Rd # A Santa Barbara, CA 93110-1315

(d) Santa Barbara Executive Office 105 E. Anapamu St. Santa Barbara, CA 93101-2063

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Case 9:24-bk-10606-MB (d)Southern California Gas Company PO Box C Monterey Park, CA 91754-0932

(d)State of California-CALOSHA 1515 Clay Street, Suite 1901 Oakland, CA 94612-1423

(d)Wilmington Savings Fund Society, FSB 500 Delaware Ave Wilmington, DE 19801-1490

End of Label Matrix Mailable recipients 131 Bypassed recipients 48 Total 179 Doc 224 Filed 07/11/25 Entered 07/11/25 15:06:15 Desc Matter Program PO Box 1888 Department of Justice PO Box 70550 Sacramento, CA 95812-1888 Oakland, CA 94612-0550

(d) The Law Offices of Alex W. Craigie 791 Via Manana Santa Barbara, CA 93108-1332 (d)Verizon Wireless P.O. Box 660108 Dallas, TX 75266-0108

(u) Brad D. Krasnoff

(u)Susan Whalen

Case 9:24-bk-10606-MB Doc 228 Filed 07/14/25 Entered 07/14/25 13:50:35 Desc Main Document Page 16 of 16

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: 2818 La Cienega Avenue, Los Angeles, CA 90034.

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. <u>TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)</u>: 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*) **July 14**, **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:

- William C Beall Will@BeallandBurkhardt.com, carissa@beallandburkhardt.com
- Matthew Bouslog mbouslog@allenmatkins.com, ncampos@allenmatkins.com
- Jeffrey D Cawdrey jcawdrey@grsm.com, madeyemo@gordonrees.com;asoto@grsm.com;amatthews@grsm.com
- Jacquelyn H Choi jacquelyn.Choi@rimonlaw.com, docketingsupport@rimonlaw.com
- Jeffrey I Golden jgolden@go2.law, kadele@ecf.courtdrive.com;cbmeeker@gmail.com;lbracken@wgllp.com;dfitzgerald@go2.law;golden.jeffreyi.b117 954@notify.bestcase.com
- Elizabeth Jones elizabeth.jones@doj.ca.gov
- Sandra McBeth (TR) jwalker@mcbethlegal.com, CA65@ecfcbis.com;ecf.alert+McBeth@titlexi.com
- Reed H Olmstead reed@olmstead.law, r41602@notify.bestcase.com
- Aram Ordubegian ordubegian.aram@arentfox.com
- Jennifer Richardson jrichardson@countyofsb.org
- Catherine Schlomann Robertson crobertson@spencerfane.com, cwilkison@spencerfane.com
- David B Shemano dshemano@shemanolaw.com
- Dara L Silveira dsilveira@kbkllp.com, cmitsuoka@kbkllp.com
- Annie Y Stoops annie.stoops@afslaw.com, yvonne.li@afslaw.com;mia.ferguson@afslaw.com
- United States Trustee (ND) ustpregion16.nd.ecf@usdoj.gov

2. <u>SERVED BY UNITED STATES MAIL</u>: On (*date*) <u>July 14, 2025</u>, 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 <u>will be completed</u> no later than 24 hours after the document is filed.

None.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for

<u>each person or entity served</u>): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) <u>July 14, 2025</u>, 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 <u>will be completed</u> no later than 24 hours after the document is filed.

None.

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.

July 14, 2025	D. Woo	/s/ D. Woo
Date	Printed Name	Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

F 9013-3.1.PROOF.SERVICE