

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address

☐ Individual appearing without attorney  
☒ Attorney for: Debtor and Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - NORTHERN DIVISION

In re:  
Santa Paula Hay & Grain and Ranches,

CASE NO.: 9:25-bk-10314-RC  
CHAPTER: 11

## NOTICE OF SALE OF ESTATE PROPERTY

Debtor(s).

**Sale Date:** 02/24/2026

**Time:** 1:00 pm

**Location:** Courtroom 201, 1415 State Street, Santa Barbara, CA 93101-2511

**Last date to file objections: 02/10/2026**

Real property located at Terra Bella, CA 93270, Fairfield Farms Tr 4 Allt 30 (40 Acres of Vacant Land), APN 323-310-006 and 323-310-007 ("Ranch 66" and/or the "Property")

See Attachment "1"

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*):** See Attachment "2"

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

February 24, 2026 at 1:00 p.m. (Pacific Time). Courtroom 201, 1415 State Street, Santa Barbara, CA 93101-2511

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

Vanessa Haberbush  
444 West Ocean Boulevard, Suite 1400  
Long Beach, CA 90802  
Telephone: (562) 435-3456  
Email: vhaberbush@lbinsolvency.com

Date: 02/03/2026

**Attachment 1**  
**Terms and Conditions of the Sale**

The material terms and conditions of the Sale are as follows:

- a. The Property shall be sold by Debtor to Buyer for \$465,000, or such higher amount as may be offered at the hearing on the Motion to Sell;
- b. The offer to purchase the Property by Buyer is subject to a higher and better offer being made at the hearing on the Motion by any other party wishing to purchase the Property;
- c. The Buyer has deposited \$10,000 with escrow;
- d. The sale is subject to a higher and better bid pursuant to the bidding terms set forth in the Agreement, subject to Bankruptcy Court approval. The overbidding terms are described below;
- e. The sale is subject to Bankruptcy Court approval;
- f. The Agreement indicated that the sale would close within 60 days of acceptance, but the Buyer has agreed to extend this date to allow the Motion to be heard and the sale closed within fifteen (15) days after the hearing on the Motion;
- g. The Agreement excludes the wind machines and wind machine fuel tanks on the Property;
- h. Buyer is aware that the underground irrigation system, including the main line and lateral lines, is constructed of transite (asbestos-containing) pipe, a common material used during the period of installation. Buyer acknowledges the presence of this material and agrees to accept the property in its current condition; and
- j. The Buyer has no broker.

**Attachment 2**  
**Overbidding Procedures**

The initial overbid shall be \$475,000 and, thereafter, in \$5,000 increments. Overbidders must be qualified as financially able to complete a purchase at least 48 hours business hours prior to the hearing on this Motion (no later than February 20, 2026 at 1:00 p.m.) by providing proof of such the ability to close the sale to Debtor's counsel, Haberbush, LLP, Attn: Vanessa M. Haberbush, Esq., 444 West Ocean Boulevard, Suite 1400, Long Beach, CA 90802, Telephone: (562) 435-3456, E-mail: vhaberbush@lbinsolvency.com. Any qualified overbidder must execute an agreement for the purchase of the Property on the same terms as the Agreement except that the purchase price must be at least \$470,000 and must provide such Agreement to Debtor's counsel at least 48 hours prior to the hearing on this Motion. Any qualified overbidder must provide the deposit indicated in the Agreement to escrow no later than 48 hours prior to the hearing on the Motion. Any qualified overbidder, or its representative, must attend the hearing on the Motion. Debtor will inform Buyer of any approved overbidder within 48 hours of qualifying an overbidder, or at least 24 hours prior to the hearing on the Motion (no later than February 23, 2026 at 1:00 p.m.), whichever is sooner. The auction for the Property will take place at the hearing on the Motion, with the highest and best bid determined at the hearing, and any backup bidder determined at that time. If the Buyer or an overbidder is not the winning bidder, the deposit of \$5,000 is refundable, but becomes nonrefundable upon the bidder being the successful bidder. Debtor seeks approval of these overbidding provisions as part of the Motion.

## 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:

444 West Ocean Boulevard, Suite 1400, Long Beach, CA 90802

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:

**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 **February 3, 2026**, 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 **February 3, 2026**, 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 \_\_\_\_\_, 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.

February 3, 2026

Date

Alexander S. Bostic

Printed Name

  
Signature

- **William C Beall** Will@BeallandBurkhardt.com, carissa@beallandburkhardt.com
- **Lane K Bogard** lbogard@lbinsolvency.com,  
dhaberbush@lbinsolvency.com, ahhaberbush@lbinsolvency.com, abostic@lbinsolvency.com, h  
aberbush.assistant@gmail.com, vhaberbush@lbinsolvency.com, jborin@lbinsolvency.com
- **Donald H Cram** don.cram@stinson.com, cas@severson.com
- **Brian David Fittipaldi** brian.fittipaldi@usdoj.gov
- **Diego B Flores** dflores@sflaw.com, dbflores@gmail.com
- **Jessica L Giannetta** jessica@giannettalawcorp.com, melanie@giannettaenrico.com
- **Karen L Grant** kgrant@silcom.com
- **David R Haberbush** dhaberbush@lbinsolvency.com,  
ahhaberbush@lbinsolvency.com, abostic@lbinsolvency.com, vhaberbush@lbinsolvency.com, h  
aberbush.assistant@gmail.com, jborin@lbinsolvency.com, lbogard@lbinsolvency.com
- **Vanessa M Haberbush** vhaberbush@lbinsolvency.com,  
dhaberbush@lbinsolvency.com, ahhaberbush@lbinsolvency.com, abostic@lbinsolvency.com, h  
aberbush.assistant@gmail.com, jborin@lbinsolvency.com, lbogard@lbinsolvency.com
- **Ivo Keller** ikeller@sflaw.com, calendar@sflaw.com
- **Sweeney Kelly** kelly@ksgklaw.com
- **Raffi Khatchadourian** raffi@hemar-rousso.com
- **Matthew F Kye** mkye@kyelaw.com
- **Cameron Schlagel** cschlagel@swlaw.com, dkunz@swlaw.com
- **United States Trustee (ND)** ustpreion16.nd.ecf@usdoj.gov
- **William E. Winfield** ww infield@calattys.com, scuevas@calattys.com

**The following have been served via United States Mail:**

AgWest Farm Credit  
Shartsis Friese LLP  
425 Market Street  
11th Floor  
Attn: Ivo Keller  
San Francisco, CA 94105

Buxman Group  
10425 S. Kings River Rd.  
Reedley, CA 93654

Century 21 Masters  
744 E. Main Street  
Santa Paula, CA 93060

ICON Servicing, Inc.  
488 E. Ocean Blvd.  
Unit 201  
Long Beach, CA 90802-4763

Imperial County Treasurer-Tax Collector  
940 West Main Street, Suite 106  
El Centro, CA 92243

Ventura County Tax Collector  
Attn: Bankruptcy  
800 South Victoria Ave  
Ventura, CA 93009

County of Ventura Treasurer Tax Collector  
800 S. Victoria Avenue  
Ventura, CA 93009

Employment Development Department  
PO Box 989151  
West Sacramento, CA 95798

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

Internal Revenue Service  
Centralized Insolvency Operations  
PO Box 7346  
Philadelphia PA 19101-7346

Fuller Falls  
530 Los Angeles Ave.  
Moorpark, CA 93021

Community West Bank  
c/o Sweeney & Kelble APC  
515 S. Flower St., 18th Floor  
Los Angeles, CA 90071

Gwyn Goodman Realty, Inc.  
8106 Posita Road  
Somis, CA 93066

Kern County Treasurer Tax Collector  
Payment Center  
P.O. Box 541004  
Los Angeles, CA 90054

Zions Agriculture Finance  
500 Fifth St  
Ames, IA 50010

Ten-X  
Attention: Legal Department  
17600 Laguna Canyon Road  
Irvine, CA 92618