

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:
May 5, 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 Haberbusch
444 West Ocean Boulevard, Suite 1400
Long Beach, CA 90802
Telephone: (562) 435-3456
Email: vhaberbusch@lbinsolvency.com

Date: 05/11/2026

Attachment 1
Terms and Conditions of the Sale

The material points in the Agreement are:

- a. The Property shall be sold by Debtor to Buyer for \$1,400,000, 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 \$35,000 with escrow;
- d. The sale is subject to a higher and better bid pursuant to the sale and overbid procedures, 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 90 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. Buyer to pay \$450 transaction coordinator fee to Heritage Valley Realty and \$1500 administrative fee to Lorenzo Gama;
- j. Debtor is to pay Buyer's broker, Heritage Valley Realty, a fee of 2.5% of the purchase price from the sale proceeds;
- l. All contingencies have been waived or resolved.

Attachment 2 Overbidding Procedures

The initial overbid shall be \$1,450,000 and, thereafter, in \$10,000 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 May 29, 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 \$1,450,000 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 June 1, 2026 at 1:00 p.m.), whichever is sooner. 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 **May 12, 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 **May 12, 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.

May 12, 2026 Vanessa M. Haberbusch
Date Printed Name

/s/ Vanessa M. Haberbusch
Signature

The following have been served by the court via Notice of Electronic Filing (NEF):

- **William C Beall** Will@BeallandBurkhardt.com, carissa@beallandburkhardt.com
- **Lane K Bogard** lbogard@lbinsolvency.com, dhaberbush@lbinsolvency.com, ahaberbush@lbinsolvency.com, abostic@lbinsolvency.com, haberbush.assistant@gmail.com, vhaberbush@lbinsolvency.com, jborin@lbinsolvency.com
- **David Coats** dacoats@raslg.com
- **Donald H Cram** don.cram@stinson.com, cas@severson.com
- **David Edward Edsall** david.edsall@venturacounty.gov
- **Dane W Exnowski** dane.exnowski@mccalla.com, bk.ca@mccalla.com, mccallaecf@ecf.courtdrive.com
- **Brian David Fittipaldi** brian.fittipaldi@usdoj.gov
- **Diego B Flores** dflores@sflaw.com, dbflores@gmail.com
- **Jeffrey W Frey** jeff.frey@aalrr.com
- **Jessica L Giannetta** jessica@giannetalawcorp.com, melanie@giannettaenrico.com
- **Karen L Grant** kgrant@silcom.com
- **David R Haberbush** dhaberbush@lbinsolvency.com, ahaberbush@lbinsolvency.com, abostic@lbinsolvency.com, vhaberbush@lbinsolvency.com, haberbush.assistant@gmail.com, jborin@lbinsolvency.com, lbogard@lbinsolvency.com
- **Vanessa M Haberbush** vhaberbush@lbinsolvency.com, dhaberbush@lbinsolvency.com, ahaberbush@lbinsolvency.com, abostic@lbinsolvency.com, haberbush.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
- **Raymond A Policar** policarlaw@att.net
- **Don J Pool** dpool@fennemorelaw.com, mmeister@fennemorelaw.com; clalonde@fennemorelaw.com
- **Cameron Schlagel** cschlagel@swlaw.com, dkunz@swlaw.com
- **United States Trustee (ND)** ustpreion16.nd.ecf@usdoj.gov
- **William E. Winfield** wwinfield@calattys.com, scuevas@calattys.com

The following have been served via United States Mail:

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

Lorenzo Gama
323 Burden Street
Oakview, CA 93002

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

Lorenzo Gama
C/O Heritage Valley Realty
568 Finch Ct.,
Fillmore, CA 93015

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

LIV Sotheby's International Realty
727 West Ojai Ave.
Ojai, CA 93023

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

SPS Lending
PO Box 19009
San Bernardino, CA 92423

Internal Revenue Services
P.O. Box 21126
Philadelphia, PA 19114

EDD
P.O. Box 19009
San Bernardino, CA 92423

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

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

AgWest Farm Credit
3755 Atherton Rd
Rocklin, CA 95765

Employment Development Department
PO Box 989151
West Sacramento, CA 95798

AgWest Farm Credit
C/O Ivo Keller, Shartsis Friese LLP
425 Market St, Fl 11
San Francisco, CA 94105

Daniel A. Higson
Law Offices of Daniel A. Higson, APC
5450 Telegraph Road, Suite 253
Ventura, CA 93003

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