

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  <b>HABERBUSH, LLP</b> DAVID R. HABERBUSH, ESQ., SBN 107190 VANESSA M. HABERBUSH, ESQ., SBN 287044 LANE K. BOGARD, ESQ., SBN 306972 444 West Ocean Boulevard, Suite 1400 Long Beach, CA 90802 Telephone: (562) 435-3456 Facsimile: (562) 435-6335 E-mail: vhaberbush@lbinsolvency.com  <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for Debtor and Debtor-in-Possession	FOR COURT USE ONLY
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<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - NORTHERN DIVISION</b>	
In re: Santa Paula Hay & Grain and Ranches,          Debtor(s).	CASE NO.: 9:25-bk-10314-RC CHAPTER: 11          <b>NOTICE OF SALE OF ESTATE PROPERTY</b>

<b>Sale Date:</b> 05/19/2026	<b>Time:</b> 1:00 pm
<b>Location:</b> Courtroom 201, 1415 State Street, Santa Barbara, CA 93101-2511	

**Type of Sale:**  Public  Private      **Last date to file objections:** 05/05/2026

**Description of property to be sold:**  
 Real property located at 125 S. 10th Street, Santa Paula, CA 93060, APN 101-0-214-225 (the "Restaurant" and/or the "Property")

**Terms and conditions of sale:**  
 See Attachment "1"

**Proposed sale price:** \$ 1,800,000.00

**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 19, 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: 04/28/2026

**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 \$1,800,000, 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 \$5,000 with escrow;
- d. The purchase of the Property includes all kitchen appliances, tables, chairs, cabinets, furniture, dishes, loose items, and decorations that are currently at the Property (the “Personal Property”). These items are being sold to the Buyer for \$50,000, with the sale price for the Property being apportioned \$1,750,000 for the Property and \$50,000 for the Personal Property. The Personal Property is being transferred in an “as is” condition with no warranty. However, Debtor will retain the meat display cases, the meat portable walk-in refrigerator/freezer located outside, the portable juice press located on the bar counter, and the glass refrigerator located in the dining room.  
Declaration of Guadalupe A. Guzman ¶ 10;
- e. Sale is “as is, where is”;
- f. The sale is subject to Bankruptcy Court approval;
- g. 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;
- h. The sale is subject to a higher and better bid pursuant to the sale and overbid procedures determined in Debtor’s sole discretion, subject to Bankruptcy Court approval. The overbidding terms are described below; and
- j. The Buyer’s broker will be paid by Debtor in connection with the Sale.

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

The initial overbid shall be \$1,850,000 and, thereafter, in \$1,000 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 15, 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 \$1,850,000 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 May 18, 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 **April 28, 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 **April 28, 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.

April 28, 2026      Alexander S. Bostic  
Date                      Printed Name

  
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@giannettalawcorp.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,  
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- **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
- **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

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

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

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

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

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

Employment Development Department  
PO Box 989151  
West Sacramento, CA 95798

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

Mid Valley Financial  
7644 N Palm Ave  
Fresno, CA 93711

Vicente F. Castillo & Maria L. Gomez  
99-050 Kaupili Place  
Aiea, HI 96701

Michelle Rontell  
c/o Don J. Pool  
8080 N. Palm Ave, Third Flor  
Fresno, CA 93711

Michelle Rontell, as Trustee of Trust B of t  
c/o Don J. Pool  
FENNEMORE LLP  
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