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| Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address HABERBUSH, LLP 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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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - NORTHERN DIVISION**

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| In re: Santa Paula Hay & Grain and Ranches, Debtor(s). | CASE NO.: 9:25-bk-10314-RC CHAPTER: 11 <p style="text-align: center;">NOTICE OF SALE OF ESTATE PROPERTY</p> |
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| Sale Date: 04/07/2026 | Time: 1:00 pm |
| Location: Courtroom 201, 1415 State Street, Santa Barbara, CA 93101-2511 | |

Type of Sale: Public Private **Last date to file objections:** 03/24/2026

Description of property to be sold:
 Real property located at Sand Canyon Road, Somis, CA 93033, Mp Ref 010Pm 089 Pr (21.24 Acres of Vacant Land), APN 101-0-210-190 ("Sand Canyon" and/or the "Property")

Terms and conditions of sale:
 See Attachment "1"

Proposed sale price: \$ 1,100,000.00

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:

April 7, 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: 03/17/2026

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 \$1,100,000, 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 two wind machines, two propane tanks, and one storage container on the Property. The Buyer takes the position that the wind machines, diesel tanks, and storage container are fixtures on the Property. The wind machines, propane tanks, and storage container on the Property have no liens attached to them except for the lien of AgWest, pursuant to the liens set forth herein, so Debtor does not dispute this characterization for purposes of this Motion but otherwise believes they are not fixtures and will likely take the position that these items are not fixtures in other contexts;¹
- e. Debtor will reinstall a 3" irrigation meter from V.C. Waterworks District #19 prior to the close of escrow, installation costs for which have already been paid;
- f. Debtor will assist the Buyer with reinstating the organic certification for the Property if the Buyer decides to apply for organic certification at a later;
- g. The sale is subject to Bankruptcy Court approval;
- h. 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;
- i. 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 has no broker.

¹ Debtor also asserts that this characterization is irrelevant because Debtor can and will allocate the sale proceeds between the personal property assets and the real property assets. For income tax purposes, Debtor's certified public accountant will use the county assessor breakdown for the sale of the Property and the sale of the fixtures as 80% for the real property and 20% fixtures/personal property assets. The wind machines are simply included as part of the purchase price of the Property for convenience. The personal property assets are also encumbered as set forth in the Motion.

Attachment 2
Overbidding Procedures

The initial overbid shall be \$1,110,000 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 April 3, 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 \$1,110,000 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 April 6, 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 **March 17, 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 **March 17, 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.

March 17, 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
- **Donald H Cram** don.cram@stinson.com, cas@severson.com
- **David Edward Edsall** david.edsall@venturacounty.gov
- **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
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- **Vanessa M Haberbush** vhaberbush@lbinsolvency.com,
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- **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** wwinfeld@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

Tom Foran and Daphne Foran
26793 Iron Canyon Rd.
Canyon Country, CA 91387

Tom Foran and Daphne Foran
C/O Compass Real Estate, Attn:
Melodie Hart
8560 Sunset Blvd., Third Floor
West Hollywood, CA 90069

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

Zions Bancorporation, N.A. dba
Zions First N
c/o Giannetta Law Corporation
Attn: Jessica L. Giannetta
7522 N. Colonial Ave., Suite
100
Fresno, California 93711

Zions Agriculture Finance
500 Fifth St
Ames, IA 50010

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PO Box 989151
West Sacramento, CA 95798

Employment Development
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Internal Revenue Service
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Internal Revenue Services
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8106 Posita Road
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Durell Mike-Price
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Camarillo, CA 93010

Anthony Mike
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425 Market Street
11th Floor
San Francisco, CA 94105

AgWest Farm Credit
3755 Atherton Rd
Rocklin, CA 95765

LIV Sotheby's International
Realty
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Ojai, CA 93023

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