

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

Robert P. Goe - State Bar No. 173019

GOE FORSYTHE & HODGES LLP

17701 Cowan, Suite 210

Irvine, CA 92614

Telephone: (949) 798-2460 / Fax: (949) 955-9437

RGoe@goeforlaw.com

☐ *Individual appearing without attorney*

☒ Attorney for: Larry D. Simons, Chapter 7 Trustee

FOR COURT USE ONLY

## UNITED STATES BANKRUPTCY COURT

In re:

WEI DAI,

CASE NO.: 6:20-bk-16456-SY

CHAPTER: 7

Debtor(s).

AMENDED

# NOTICE OF SALE OF ESTATE PROPERTY

**Sale Date:** 02/15/2024

Time: 9:30 am

**Location:** 3420 Twelfth Street, Courtroom 302, Riverside, CA 92501

☒ Public

☐ Private

**Last date to file objections:** SEE DOCKET NO. 189

**Description of property to be sold:**

All of the Estate's assets, claims, demands, controversies, actions, causes of action, suits, avoidance actions referenced in Section 546 of the Bankruptcy Code ("Assets"), including the four (4) adversary proceedings currently pending, as well as any other claims or causes of action owned by the Estate.

**Terms and conditions of sale:**

The Assets are being sold "as-is - where-is" and with no representations or warranties as set forth in Section 2.2.2 of the Agreement. The amount of \$800,000 for the Assets plus six percent (6%) of the proceeds of any recovery by Huang on the Assets, after deducting fees and costs incurred by Huang in pursuing the Assets.

**Proposed sale price:** \$800,000.00 plus 6% of any recovery on the Assets

**Overbid procedure (if any):**

Potential overbidders must bid at least \$850,000.00 and then in increments of \$10,000.00 greater than the prior bid.

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

February 15, 2024 at 9:30 a.m.  
United States Bankruptcy Court  
3420 Twelfth Street  
Courtroom 302  
Riverside, CA 92501

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

Robert P. Goe, Esq.  
GOE FORSYTHE & HODGES LLP  
17701 Cowan, Suite 210  
Irvine, CA 92614  
T: (949) 798-2460 / F: (949) 955-9437  
RGoe@goeforlaw.com

Date: 01/18/2024

## 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:  
17701 Cowan, Suite 210, Irvine, CA 92614

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:

**1. 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 *(date)* 01/18/2024, 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 *(date)* 01/18/2024, 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 *(date)* 01/18/2024, 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.

Honorable Scott Yun, USBC, 3420 Twelfth Street, Riverside, CA 92501

☐ 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.

01/18/2024  
Date

Susan C. Stein  
Printed Name

/s/Susan C. Stein  
Signature

**Mailing Information for Case 6:20-bk-16456-SY**

**Electronic Mail Notice List**

The following is the list of parties who are currently on the list to receive email notice/service for this case.

- Reem J Bello rbello@goeforlaw.com, kmurphy@goeforlaw.com
- Jesse S Finlayson jfinlayson@ftrlfirm.com, hkader@ftrlfirm.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- Everett L Green everett.l.green@usdoj.gov
- Marshall J Hogan mhogan@swlaw.com, fcardenas@swlaw.com
- Christopher A, Minier cminier@go2.law,  
kadele@go2.law;dfitzgerald@go2.law;cmeeker@go2.law
- Brett Ramsaur brett@ramsaurlaw.com,  
alecia@ramsaurlaw.com;paralegal@ramsaurlaw.com
- Ryan S Riddles rriddles@goeforlaw.com, kmurphy@goeforlaw.com
- Bryan K Sheldon bryan.sheldon@limnexus.com,  
clement.leung@limnexus.com;tyree.west@limnexus.com
- Larry D Simons (TR) larry@lsimonslaw.com,  
c119@ecfcbis.com;nancy@lsimonslaw.com;simonsecf@gmail.com;kareng@lsimonslaw.co  
m
- Maria W Tam tammailbox@gmail.com
- David A. Tilem davidtilem@tilemlaw.com,  
DavidTilem@ecf.inforuptcy.com;joanfidelson@tilemlaw.com;JoanFidelson@ecf.inforuptcy.  
com;TilemDR69450@notify.bestcase.com
- James E Till james.till@till-lawgroup.com, martha.araki@till-  
lawgroup.com;myrtle.john@till-lawgroup.com;sachie.fritz@till-lawgroup.com
- United States Trustee (RS) ustpregion16.rs.ecf@usdoj.gov
- Mandy Youngblood csbk@gmfinancial.com
- Jason T Yu jyu@swlaw.com, mrobbins@swlaw.com

**In re Wei Dai**  
**USBC Case No. 6:20-bk-16456-SY**

**Debtor**  
Wei Dai  
1337 Brea Canyon Cut-off Rd  
La Puente, CA 91748-2419

**United States Trustee (RS)**  
United States Trustee  
3801 University Avenue, Suite 720  
Riverside, CA 92501-3255

**Chapter 7 Trustee**  
Larry D. Simons (TR)  
3610 Central Avenue, Suite 400  
Riverside, CA 92506

**Debtor's Counsel**  
David A. Tilem  
Law Offices of David A. Tilem  
206 N Jackson St, Ste 201  
Glendale, CA 91206-4330

**Trustee's Special Counsel**  
William M. Hulsy, C.F.L.S.  
710 N. Spurgeon St.  
Santa Ana, CA 92701

**Trustee's Special Counsel**  
David Zhou Yi  
35F Huaneng Union Tower  
958 Lujiazui Ring Road  
Shanghai 200120  
People's Republic of China

**Counsel for Shenzhen Jinqiaoxin  
Investment Holding Co. Ltd**  
Maria W. Tam, Esq.  
Law Offices of Maria W. Tam  
9650 Telstar Avenue, Unit A  
El Monte, CA 91731

**Counsel for ITN Holdings Limited:**  
James E. Till, Esq.  
Till Law Group  
120 Newport Center Drive  
Newport Beach, CA 92660

**Counsel for Shujian Huang**  
Rongping (Larry) Wu  
DGW Kramer LLP  
One Rockefeller Plaza, Suite 1060  
New York, NY 10020-2073

## **CREDITORS**

Bank of America  
PO Box 982238  
El Paso TX 79998-2238

Bao Feng Zhao  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai,  
China

Beijing Bank Attorney Li Hujun  
Chaoyang North Branch  
Rom 307 Ste 203 Chuang Zhi Bldg  
No 482 Shengtai Cheng Dongman  
Zhonglu Tianjian  
China

Beijing Shin Bon Dian Dang Co Ltd  
No 51 Jia No 11 Shin Xin Xiao Dist  
Yian Qing District  
Beijing,  
China

Bin Feng Jin  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai,  
China

Changchun Countryside Com Bnk  
Dalian Jin Ma Rd Branch Xiao Huang  
2 Dong No 3 5 and 3 Dong No 5 6  
Hong Cheng Jing Palm Economic Tech  
Dalian Liaoning Prov,  
China

JPMorgan Chase Bank N A  
Bankruptcy Mail Intake Team  
700 Kansas Lane Floor 01  
Monroe, LA 71203-4774

Chen Bin Tong  
65C 6B No 215 Qingnian Da St  
Shen He District  
Shenyang Liaoning  
Province,  
China

China Bohai Bank  
No 9 Yan an Road Zhongshan Dist  
Dalian Liaoning Prov,  
China

China Cinda Asset Mgmt Co Ltd  
No 601 602 F1 6 No 3  
Yinpan North Street Hunan District  
Shenyang Liaoning Prov,  
China

China Hua Rong Asset Mgmt Co Ltd  
Dalian Branch  
No 51 Gengxin Street Xi Gang Dist  
Dalian Liaoning Prov,  
China

Feng Li  
1 29 1 No 183 5 South Wu Ma Road  
He Ping District  
Shenyang Liaoning Prov,  
China

Cunwen Zhu  
~~Selina X Jin~~  
4240 Golden Glen Dr  
~~China Hills CA 91709 4674~~  
RTS Unable to Fwd 09-23-2022

Dalian Bank Co Ltd  
No 88 Zhongshan Road  
Dalian Liaoning Prov,  
China

Dalian Bo Rui Invest Consult Co Ltd  
~~No 11 Fu Jing Yuan Sa He Kou Dist~~  
~~Dalian Liaoning,~~  
~~China~~  
RTS Unknown 07-30-2021

Dalian Run De Fu Cheng Real Estate  
F1 11 No 44 Changjian Road  
Zhongshan District  
Dalian City  
Liaoning Prov,  
China

Dalian Rural Commercial Bank  
~~Jin Zhou Branch~~  
~~No 108 2 3 Guanmin Street Jin Zhou~~  
~~Dalian Liaoning Prov,~~  
China – RTS Insufficient Addr 07-30-2021

Dan Dong Bank  
No 198 1 Ya Lu River Da Street  
Zhen Xin District  
Dan Dong City  
Liaoning Prov,  
China

Evergrande RE Group/Jinan Real Estate  
c/o Jon Michaelson  
Kilpatrick Townsend Stockton LLP  
1080 Marsh Road  
Menlo Park, CA 94025-1015

Fong Zuo  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

GM Financial  
PO Box 183834  
Arlington, TX 79096-3138

Golden Bridge Int 1 Investment Inc  
600 N Rosemead Blvd, Unit 123  
Pasadena, CA 91107-2153

Gong Cheng Rep Atty Xia Hua Zhu  
~~Suite G F1 22 Dong Feng Int#~~  
~~Tech Bldg No 58~~  
~~Xiang Cheng Road~~  
Shanghai, China-RTS Vacant 05-14-2021

Hai Zian Ge  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Hong Hua Li  
Represented by Atty Hong Jie Li  
Suite 703 706 Zuo C  
New Xin Xin Hai Enter Sa He Ko Dist  
Dalian Liaoning Prov, China

Hong Yang  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Hua Quan Chen  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

ITN Holdings Ltd  
Ryan King Sheldon Alexander et al  
Limnexus LLP  
707 Wilshire Blvd, 46<sup>th</sup> Fl  
Los Angeles, CA 90017-3612

Je Tong  
B 10C No 225 Qingian De Street  
Shen He District  
Shengang Liaoning, China

Ji Ma  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Ji Zhong Yuan  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Jian Lin Li  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Jiang Zhong Wang  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Jin Wan LiRep by Hong Jie Li  
Suite 703 706 Zuo C  
New Xin Xin Hai Enter Sa He Ko Dist  
Dalian Liaoning Prov, China

Jing Liu  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Karma Automotive  
9950 Jeronimo Rd  
Irvine, CA 92618-2014

LI Xia Zhang  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Law Offices of Roger C Hsu  
175 S Lake Ave Suite 210  
Pasadena, CA 91101-2629

Li Jin  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Li Qiu Huang  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Ming Jun Zhang  
Represented by Atty Hong Jie Li  
Suite 703 706 Zuo C  
New Xin Xin Hai Enter Sa He Ko Dist  
Dalian Liaoning Province, China

Nan Wang  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Nanjing Bank  
Beijing Branch  
No 10 Jinrong Da Street  
Xi Cheng District  
Beijing, China

Ping Tou Zhao  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Pong Gao  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Qing Hai Bank  
Building 1 No 130 Xilan Da Street  
Chengxi District  
Xining City Qing Hai Prov, China

Shujian Huang  
121 No 452 North Wu Jin Street  
He Ping District  
Shengang Liaoning Prov, China

Su Zen Wangi  
Rep by Atty Hong Jie Li  
Suite 703 706 Zuo C  
New Xin Xin Hai Enter Sa He Ko Dist  
Dalian Liaoning Prov, China

Wei Xin Fong  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Wen Zhang Rep by Atty Zhao Lian Yao  
F1 15 Zuo B Hui Jin Int 1 Bldg 788  
Hong Cheng Road Xi Hu District  
Nanchang City Jianxi Prov, China

Xi Hong Pan  
Ste 1502 Dan Yuan 3 Bldg No 2  
Yuan No 1 Lian Hua He Hu Dong  
Xi Cheng District, Beijing, China

Xiao Wang  
Snsell & Wilmre LLP, c/o Jason Yu  
350 South Grand Ave, Ste 3100  
Los Angeles, CA 90071-3420

Xu Wang  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Xiao Jun Luo  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Xue Jian Sun  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Yao Yu Zhu  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Yen Fong Jiang  
Represented by Atty Feng Xu  
Suite 13A World Plaza  
No 855 Pudong South Road  
Shanghai, China

Yu Xu Dong  
Represented by Atty Hong Jie Li  
Suite 703 706 Zuo C  
New Xin Xin Hai Enter Sa He Ko Dist  
Dalian Liaoning Prov, China

Zhongxin (CITIC) Bank  
No 29 Ren Min Road Zhongshan Dist  
Dalian City, Liaoning Prov, China

Zhu Yu Wang  
Rep by Atty Hong Jie Li  
Suite 703 706 Zuo C  
New Xin Xin Hai Enter Sa He Ko Dist  
Dalian Liaoning Prov, China

Rong Shen  
Represented by Mei Jia  
Suite 812 Beijing Int 1 Ctr No 3  
No 38 Yuan Shan Huan North Rd  
Chao Yang District, Beijing China

Shang Fei  
212 No 4 Yong An Road  
He Ping District  
Shenyang Liaoning, China

Shenyang Jin Ron Shang Mao Dev Dist  
Hei De Feng Small Amount Loan Co Lt  
B2101 No 19 Yo Hao St Shen He Dist  
Shenyang Liaoning, China

ITN Holdings Ltd  
James E. Till, Esq.  
c/o Limnexus LLP  
707 Wilshire Blvd, 46<sup>th</sup> Fl  
Los Angeles, CA 90017-3612

Eric Zhang, CPA  
Eric Zhang & Associates LLP  
18725 E. Gale Ave #250  
City of Industry, CA 91748-1374

Pafica Patricia Wong, CPA  
Able Business Accounting  
2211 S. Hacienda Blvd, Ste 218  
Hacienda Heights, CA 92745-4609

ITN Holdings Ltd  
Attn: Shrikumar Ramakrishnan Nair  
3968 Avenida Verano  
Thousand Oaks, CA 91360-6903

Rongping Wu  
DGW Kramer LLP  
One Rockefeller Plaza, Ste 1060  
New York, NY 10020-2073

JPMorgan Chase Bank, N.A.  
s/b/m/t Chase Bank USA, N.A.  
c/o National Bankruptcy Services, LLC  
PO Box 9013  
Addison, TX 75001-9013