

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Robert P. Goe - State Bar No. 137019 Charity J. Manee – State Bar No. 286481 GOE FORSYTHE & HODGES LLP 17701 Cowan, Suite 210, Building D Irvine, CA 92614 rgoe@goeforlaw.com cmanee@goeforlaw.com Telephone: (949) 798-2460 Facsimile: (949) 955-9437 ☐ Individual appearing without attorney ☒ Attorney for: AAA Tree Service LLC		FOR COURT USE ONLY	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION			
In re: AAA TREE SERVICE LLC, Debtor(s).		CASE NO.: 6:23-bk-12229-RB CHAPTER: 11 NOTICE OF SALE OF ESTATE PROPERTY	

Sale Date: 03/28/2024	Time: 2:00 pm
Location: Courtroom 303, U.S. Bankruptcy Court, 3420 Twelfth Street, Riverside, CA 92501	

Type of Sale: ☒ Public ☐ Private **Last date to file objections:** 03/14/2024

Description of property to be sold:

Employee Retention Credit tax refund of approximately \$2,113,078.70, with net equity of \$1,212,703.72

Terms and conditions of sale:

Subject to the lien of Finance ERC West, Inc., an affiliate of Buyer, which consents to the sale.

Proposed sale price: \$ 610,000.00

Overbid procedure (if any):

The sale is not subject to overbid.

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

Courtroom 303
United States Bankruptcy Court
3420 Twelfth Street
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, Bldg. D
Irvine, CA 92614
(949) 798-2460
Email: rgoe@goeforlaw.com

Date: 03/07/2024

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, Bldg. D, 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)* 03/07/2024, 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)* 03/07/2024, 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)* 03/07/2024, 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.

Hon. Magdalena Reyes Bordeaux, 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.

03/07/2024
Date

Susan C. Stein
Printed Name

/s/Susan C. Stein
Signature

Mailing Information for Case 6:23-bk-12229-RB

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.

- Andrew K Alper aalper@frandzel.com, rsantamaria@frandzel.com
- David A Berkley david.berkley@wbd-us.com, mary.koo@wbd-us.com; Sul.Lee@wbd-us.com
- Christopher Beyer cab@replevin.com, ecf@writofseizure.com
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- Cheryl A Skigin caskigin@earthlink.net, caskigin@earthlink.net
- United States Trustee (RS) ustpregion16.rs.ecf@usdoj.gov
- Kevin P Whiteford kw@swllplaw.com

In re AAA Tree Service LLC
U.S.B.C. Case No. 6:23-12229-RB

Debtor
AAA Tree Service LLC
30141 Antelope Valley Rd Ste D #612
Menifee, CA 92584

U. S. Trustee – Riverside
United States Trustee (RS)
3801 University Avenue, Suite 720
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Law Offices of Cheryl A Skigin
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ASCENTIUM CAPITAL
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Memphis, TN 38148-0059

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Madera, CA 93636-7983

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Chicago, IL 60603-3537

Express 4x4 Truck Rental
330 S Warminster Rd, Ste 334
Hatboro, PA 19040-3433

De Lage Landen Financial Services Inc
Whiteford Law
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Sacramento, CA 95825-3939

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Federal Way, WA 98063-4568

First Insurance Funding
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Carol Stream, IL 60197-7000

Finance ERC West Inc
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Boca Raton, FL 33429-5118

Industrial Training Services
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Murray, KY 42071-7847

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Herc Rentals
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~~Melville, NY 11747-4809~~
RTS 2-19-2024

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Ford Motor Credit Company LLC
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Cooksey Toolen Gage Duffy & Woog
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Regions Bank, successor by merger
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