

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address SMILEY WANG-EKVALL, LLP Lei Lei Wang Ekvall, State Bar No. 163047 lekval@swelawfirm.com Robert S. Marticello, State Bar No. 244256 rmarticello@swelawfirm.com Michael L. Simon, State Bar No. 300822 msimon@swelawfirm.com 3200 Park Center Drive, Suite 250 Costa Mesa, California 92626 Telephone: 714 445-1000 Facsimile: 714 445-1002 <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 - SANTA ANA DIVISION**

In re: TD REO FUND, LLC, Debtor(s).	CASE NO.: 8:17-bk-11996-SC CHAPTER: 11 <p style="text-align: center;">NOTICE OF SALE OF ESTATE PROPERTY</p>
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Sale Date: 05/15/2019	Time: 11:00 am
Location: Courtroom 5C, U.S. Bankruptcy Court, 411 W. 4th Street, Santa Ana, California	

Type of Sale: Public Private **Last date to file objections:** 05/01/2019

Description of property to be sold:
37370 Horsemans, Temecula, California

Terms and conditions of sale: Sale is in an as-is, where-is condition or basis by quitclaim deed, without representations or warranties whatsoever, implied or express, including, without limitation, representations or warranties as to title, oil, and mineral rights, city or government agency notifications regarding work to be done, marketability of title, ownership, physical condition, compliance with state, city, or federal statutes, codes, ordinances, or regulations, geological stability, zoning, suitability for improvements on the Property, or any assurances regarding the sub-divisibility of the Property.

Proposed sale price: \$ 925,000.00

Overbid procedure (if any):

Please see attached for details.

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

May 15, 2019, at 11:00 a.m.
Ronald Reagan Federal Building and Courthouse
411 W. Fourth Street
Santa Ana, California 92701

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

Lei Lei Wang Ekvall
SMILEY WANG-EKVALL, LLP
3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
Telephone: (714) 445-1000
Email: msimon@swelawfirm.com

Date: 04/24/2019

OVERBID PROCEDURE

The Debtor has proposed the following procedure to allow for overbids prior to the Court's approval of the sale of the Property to ensure that the estate's interest in the Property is sold for the best possible price:

1. Qualifying bidders (the "Qualifying Bidder") shall:

(a) Bid at least \$10,000.00 over the Purchase Price set forth in the Agreement;

(b) Set forth in writing the terms and conditions of the offer that are at least as favorable to the Debtor as those set forth in the Purchase Agreement attached as Exhibit "7" to the Motion, including the ability to close the sale by no later than three business days after the entry of an order granting this Motion;

(c) Be financially qualified, in the CRO's exercise of his sound business judgment, to timely close the sale, with an all-cash purchase price; and

(d) Submit to the Debtor's counsel by no later than May 13, 2019, at 5:00 p.m., Pacific Time, a written offer, evidence of financial qualification, and a cash deposit of \$20,000.00 (the "Overbid Deposit") payable to TD REO Fund, LLC, in the form of a cashier's check, which Overbid Deposit shall be non-refundable if the bid is deemed to be the Successful Bid, as that term is defined below.

At the hearing on the Motion, only the Buyer and any party who is deemed a Qualifying Bidder shall be entitled to bid. Any incremental bid in the bidding process shall be at least \$5,000.00 higher than the prior bid. Upon conclusion of the bidding process, the CRO shall decide which of the bids is the best bid, and such bid shall be deemed to be the "Successful Bid." The bidder who is accepted by the CRO as the successful bidder (the "Successful Bidder") must pay all amounts reflected in the Successful Bid in cash at the closing of the sale. At the hearing on the Motion, and upon conclusion of the bidding process, the CRO may also acknowledge a back-up bidder (the "Back-Up

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1 Bidder") which shall be the bidder with the next best bid. Should the Successful Bidder
2 fail to close escrow on the sale of the Property, the Debtor may sell the Property to the
3 Back-Up Bidder without further court order.

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NOTICE OF HEARING

1 **SMILEY WANG-EKVALL, LLP**
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7 Attorneys for Debtor and Debtor-in-Possession

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **SANTA ANA DIVISION**

11 In re

Case No. 8:17-bk-11996-SC

12 WJA ASSET MANAGEMENT, LLC,

Chapter 11

13 Debtor and
14 Debtor-in-Possession.

(Jointly Administered with Case Nos.
8:17-bk-11997-SC; 8:17-bk-11998-SC;
8:17-bk-11999-SC; 8:17-bk-12000-SC;
8:17-bk-12001-SC; 8:17-bk-12002-SC;
8:17-bk-12003-SC; 8:17-bk-12004-SC;
8:17-bk-12005-SC; 8:17-bk-12006-SC;
8:17-bk-12008-SC; 8:17-bk-12009-SC;
8:17-bk-12010-SC; 8:17-bk-12011-SC;
8:17-bk-12012-SC; 8:17-bk-12013-SC;
8:17-bk-12014-SC; 8:17-bk-12015-SC;
8:17-bk-12016-SC; 8:17-bk-12018-SC;
8:17-bk-12019-SC; 8:17-bk-12124-SC;
8:17-bk-12125-SC; 8:17-bk-12126-SC;
8:17-bk-12127-SC and 8:17-bk-12285-SC)

- 15 Affects 5827 WINLAND HILLS DRIVE DEVELOPMENT FUND, LLC
- 16 Affects ALABAMA HOUSING FUND, LLC
- 17 Affects CA EXPRESS FUND, LLC
- 18 Affects CA SEE JANE GO FUND, LLC
- 19 Affects CA WHIRL FUND, LLC
- 20 Affects CLAIRTON RESIDENTIAL RENEWAL, LLC
- 21 Affects EQUITY INDEXED MANAGED FUND, LLC
- 22 Affects LUXURY ASSET PURCHASING INTERNATIONAL, LLC
- 23 Affects LVNV MULTI FAMILY LLC
- 24 Affects PMB MANAGED FUND, LLC
- 25 Affects PROSPER MANAGED FUND, LLC
- 26 Affects TD OPPORTUNITY FUND, LLC
- 27 Affects TD OPPORTUNITY FUND, LLC
- 28 Affects TD OPPORTUNITY FUND, LLC

NOTICE OF HEARING ON DEBTOR'S MOTION FOR ORDER:

- (1) **AUTHORIZING SALE OF REAL PROPERTY LOCATED AT 37370 HORSEMANS, TEMECULA, CALIFORNIA PURSUANT TO 11 U.S.C. § 363(b) AND (f);**
- (2) **APPROVING OVERBID PROCEDURES;**
- (3) **APPROVING BUYER, SUCCESSFUL BIDDER, AND BACK-UP BIDDER AS GOOD-FAITH PURCHASER PURSUANT**

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- 1 Affects TD REO FUND, LLC
- 2 Affects URBAN PRODUCE FUND, LLC
- 3 Affects WHIRL FUND, LLC
- 4 Affects WJA EXPRESS FUND, LLC
- 5 Affects WJA REAL ESTATE OPPORTUNITY FUND I, LLC
- 6 Affects WJA REAL ESTATE OPPORTUNITY FUND II, LLC
- 7 Affects WJA SECURE REAL ESTATE FUND, LLC
- 8 Affects WJA SECURE INCOME FUND, LLC
- 9 Affects WILLIAM JORDAN INVESTMENTS, INC.
- 10 Affects CA REAL ESTATE OPPORTUNITY FUND I, LLC
- 11 Affects CA REAL ESTATE OPPORTUNITY FUND II, LLC
- 12 Affects CALIFORNIA INDEXED GROWTH FUND, LLC
- 13 Affects SECURE CALIFORNIA INCOME FUND, LLC
- 14 Affects CA REAL ESTATE OPPORTUNITY FUND III, LLC
- 15 Affects All Debtors

TO 11 U.S.C. § 363(m); AND
(4) AUTHORIZING PAYMENT OF REAL ESTATE BROKER'S COMMISSION AND ORDINARY COSTS OF SALE

MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATIONS OF HOWARD GROBSTEIN AND MATTHEW HOPKINS

DATE: May 15, 2019
TIME: 11:00 a.m.
CTRM: 5C
Ronald Reagan Federal Building and Courthouse
411 W. 4th Street
Santa Ana, CA 92701

TO ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE that on **May 15, 2019 at 11:00 a.m.**, in **Courtroom 5C** of the United States Bankruptcy Court located at 411 West Fourth Street, Santa Ana, California, the *Motion for Order (1) Authorizing Sale of Real Property Located at 37370 Horsemans, Temecula, California, Pursuant to 11 U.S.C. § 363(b) and (f); (2) Approving Overbid Procedures; (3) Approving Buyer, Successful Bidder, and Back-up Bidder as Good-Faith Purchaser Pursuant to 11 U.S.C. 363(m); and (4) Authorizing Payment of Real Estate Broker's Commission and Ordinary Costs of Sale* (the "Motion") filed by TD REO Fund, LLC, one of the debtors-in-possession in the above-captioned cases ("Debtor"), will come on for hearing. The Motion is summarized as follows:

1. The Debtors are part of a network of entities or "Funds" formed to offer a range of investment opportunities to clients. Many of the Funds are performing and some had substantial gains. Certain Funds, i.e., those invested in private trust deeds secured by real estate, suffered losses. These cases were commenced to liquidate the Debtors' holdings in an orderly fashion to maximize the return for creditors and investors and to distribute the proceeds in a manner consistent with the Code's priority scheme. Howard Grobstein was appointed as the Debtors' chief restructuring officer ("CRO").

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1 2. The Debtor was the beneficiary of a deed of trust secured by real property
2 located at 37370 Horsemans, Temecula, California (the "Property"). The deed of trust
3 secured a loan to PPI Direct, LLC. Prior to the commencement of the Debtor's case, PPI
4 Direct defaulted on the loan and the Debtor was in the process of foreclosing on the
5 Property. In order to stave off the Debtor's foreclosure sale, PPI Direct and its principal
6 filed or caused to be filed three bankruptcy cases that affected the Property. On or about
7 April 2018, after obtaining relief from the automatic stay in and/or dismissal of the
8 bankruptcy cases, the Debtor foreclosed and acquired the Property pursuant to a
9 trustee's deed upon sale (the "Trustee's Deed Upon Sale") recorded as Instrument No.
10 2018-0129460. The Property consists of a 3,642 square foot home with three bedrooms
11 and four bathrooms that is situated on over 21 acres. It is in a rural area of Temecula,
12 California.

13 3. Consistent with the Debtors' goal of an orderly liquidation of assets, the
14 Debtors obtained Court authority to use certain sale procedures for REO sales [Docket
15 No. 168] (the "Sale Procedures Order"). The Sale Procedures Order was entered on
16 August 4, 2017, and a copy is attached as Exhibit "3." The Sale Procedures Order
17 authorizes the Debtors to consummate REO sales and other transactions by filing and
18 serving a notice of the proposed REO sale or transaction. The Sale Procedures Order
19 further provides that Citivest, Inc. ("Citivest") is entitled to a fee of 2% of the sale price or
20 \$750.00 (whichever is greater) (the "Citivest Fee"). The Sale Procedures Order also
21 authorizes the Debtors to pay Citivest in accordance with the asset management
22 agreement (the "Citivest Agreement"). A copy of the Citivest Agreement is attached as
23 Exhibit "4." The Citivest Agreement and the Sale Procedures Order authorize the
24 Debtors to pay certain pass-through expenses such as brokers' commissions.

25 4. Although the Debtors have used the Sale Procedures Order throughout
26 these cases to sell various properties, in this instance, the CRO believes it is in the
27 estate's best interest to file this Motion in order to invite overbids. See attached
28 Declaration of Howard Grobstein. Pursuant to the Sale Procedures Order, Citivest, on
behalf of the Debtor, entered into a listing agreement (the "Listing Agreement") with
Matthew Hopkins (the "Broker"). The Listing Agreement provides that the Broker will
receive a commission of 2.5% of the purchase price upon the successful transfer of title
to the Property. The Listing Agreement further provides that the seller agrees to pay
2.5% of the purchase price to the cooperating broker who procures a purchaser who
successfully closes on the purchase of the Property. The payment of these commissions
is subject to the successful transfer of title of the Property, and thus, subject to approval
of the Motion. The Debtor seeks authorization to pay the broker's commission and other
ordinary closing costs from the proceeds of the sale without further order of the Court.

1 5. Some of the Broker's marketing efforts included listing the Property in the
multiple listing service and other popular real estate listing services, including Trulia,
Zillow and Redfin. The Broker also caused the listing to be emailed to over 20,000
agents Riverside County, San Diego County and Orange County. The Property was
listed for almost one year and was photographed three separate times to highlight the
view during the different seasons. The Broker received a number of expressions of
interest in the Property. In the year the Property was listed, the Property was shown
approximately 40 times. Twelve interested parties viewed the Property multiple times.
The offer presented by Daniel J. O'Neill (the "Buyer") is the subject of the Motion. The
Buyer offered to purchase the Property for \$925,000.00, which, in the year that the
Property was listed, is the highest and best offer received to date. The Broker received
four other offers, the highest being \$805,000.00.

1 6. The Buyer is buying in good faith and has offered to pay market value for
the Property. The anticipated sale of the Property has been negotiated with the Buyer in

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1 "arm's-length" discussions. Moreover, the sale will be conducted in a commercially
2 reasonable manner following appropriate notice and evidence of the Debtor's marketing
3 efforts. Based on such facts and circumstances, the Debtor believes that the Court can
4 properly determine the Buyer, the Successful Bidder, and the Back-Up Bidder as a "good
5 faith purchaser" pursuant to 11 U.S.C. § 363(m).

6 7. The primary terms of the proposed sale are described below. For an
7 exhaustive description of the sale terms, refer to the *Residential Purchase Agreement*
8 *and Joint Escrow Instructions*, the *Addendum to Sale*, and all related documents
9 (collectively, "Purchase Agreement") attached to the Motion as Exhibit "7."

10 (a) Daniel J. O'Neill is the Buyer.

11 (b) Buyer shall acquire title to the Property by quitclaim deed. The
12 Property will be sold in an as-is, where-is condition or basis without
13 representations or warranties whatsoever, implied or express, including, without
14 limitation, representations or warranties as to title, oil, and mineral rights, city or
15 government agency notifications regarding work to be done, marketability of title,
16 ownership, physical condition, compliance with state, city, or federal statutes,
17 codes, ordinances, or regulations, geological stability, zoning, suitability for
18 improvements on the Property, nor any assurances regarding the sub-divisibility of
19 the Property.

20 (c) The purchase price for the Property is \$925,000.00 (the "Purchase
21 Price"). The Purchase Price is payable as follows:

22 i. Concurrently with the opening of escrow, Buyer shall deposit
23 \$10,000.00 into escrow (the "Deposit"). The Deposit shall become
24 nonrefundable except in the event of (i) the Debtor's acceptance of an
25 overbid; or (ii) the Bankruptcy Court's failure to approve the sale
26 contemplated in this Motion.

27 ii. On the closing date, Buyer shall deposit with Escrow Holder
28 the entire balance of the Purchase Price, plus all other costs and expenses
chargeable to Buyer, in good funds, less the Deposit.

(d) The sale is subject to overbid.

(e) The Purchase Agreement is subject to Bankruptcy Court approval.

8. The Debtor proposes and seeks approval of the following procedure to
allow for overbids prior to the Court's approval of the sale of the Property to ensure that
the estate's interest in the Property is sold for the best possible price:

(f) Qualifying bidders ("Qualifying Bidder") shall:

i. Bid at least \$10,000.00 over the Purchase Price set forth in
the Agreement;

ii. Set forth in writing the terms and conditions of the offer that
are at least as favorable to the Debtor as those set forth in the Purchase
Agreement attached to the Motion as Exhibit "7," including the ability to
close the sale by no later than three business days after the entry of an
order granting the Motion;

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iii. Be financially qualified, in the CRO's exercise of his sound business judgment, to timely close the sale, with an all-cash purchase price; and

iv. Submit to the Debtor's counsel by no later than May 13, 2019, at 5:00 p.m., Pacific Time, a cash deposit of \$20,000.00 ("the Overbid Deposit") payable to TD REO Fund, LLC, in the form of a cashier's check, which Overbid Deposit shall be non-refundable if the bid is deemed to be the Successful Bid, as defined below.

(b) At the hearing on the Motion, only the Buyer and any party who is deemed a Qualifying Bidder shall be entitled to bid. Any incremental bid in the bidding process shall be at least \$5,000.00 higher than the prior bid. Upon conclusion of the bidding process, the CRO shall decide which of the bids is the best bid, and such bid shall be deemed to be the "Successful Bid." The bidder who is accepted by the CRO as the successful bidder (the "Successful Bidder") must pay all amounts reflected in the Successful Bid in cash at the closing of the sale. At the hearing on the Motion, and upon conclusion of the bidding process, the CRO may also acknowledge a back-up bidder (the "Back-Up Bidder") which shall be the bidder with the next best bid. Should the Successful Bidder fail to close escrow on the sale of the Property, the Debtor may sell the Property to the Back-Up Bidder without further court order.

9. The preliminary title report ("PTR") shows current and unpaid property taxes (collectively, the "Property Taxes") for the fiscal year 2018-2019 in the amount of \$8,396.22 are due. The first installment was due April 10, 2019, is unpaid and past due, and the second installment due December 10, 2018, is \$4,198.11. Property taxes for the 2015-2016 tax year in the amount of \$34,813.12 are in default. The Debtor seeks authority to pay all real property tax arrearages through escrow without further order of the Court, including the Property Taxes. The Debtor is not aware of any other liens but expressly reserves the right to object to all or any portion of each and every claim or encumbrance that has or will be asserted against the Property.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

DEADLINE FOR OPPOSITION PAPERS: The Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose the Motion, you must file a written response with the Court and serve a copy of it on the Trustee's attorneys at the address set forth above no less than fourteen (14) days prior to the above hearing date. If you fail to file a written response to the Motion within such time period, the Court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief.

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DATED: April 24, 2019

SMILEY WANG-EKVALL, LLP

By: /s/ Michael L. Simon
MICHAEL L. SIMON
Attorneys for Debtor and Debtor-in-Possession

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Costa Mesa, California 92626
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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:
3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF HEARING ON DEBTOR'S MOTION FOR ORDER: (1) AUTHORIZING SALE OF REAL PROPERTY LOCATED AT 37370 HORSEMANS, TEMECULA, California PURSUANT TO 11 U.S.C. § 363(b) AND (f); (2) APPROVING OVERBID PROCEDURES; (3) APPROVING BUYER, SUCCESSFUL BIDDER, AND BACK-UP BIDDER AS GOOD-FAITH PURCHASER PURSUANT TO 11 U.S.C. § 363(m); AND (4) AUTHORIZING PAYMENT OF REAL ESTATE BROKER'S COMMISSION AND ORDINARY COSTS OF SALE MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATIONS OF HOWARD GROBSTEIN AND MATTHEW HOPKINS** 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*) **April 24, 2019**, 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*) **April 24, 2019**, 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.

The Hon. Scott C. Clarkson
United States Bankruptcy Court
411 West Fourth Street, Suite 5130
Santa Ana, CA 92701-4593

Office of the Treasurer-Tax Collector
4080 Lemon Street
Riverside, CA 92501

Citivest, Inc.
Attn: Dana Haynes
4340 Von Karman Ave Ste 110
Newport Beach, CA 92660

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*) _____, 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 24, 2019	Gabriela Gomez-Cruz	/s/ Gabriela Gomez-Cruz
<u>Date</u>	<u>Printed Name</u>	<u>Signature</u>

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Kyra E Andrassy kandrassy@swelawfirm.com, csheets@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- James C Bastian jbastian@shbllp.com
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- Wayne R Terry wterry@hemar-rousso.com
- Todd C Toral ttoral@jenner.com, todd-toral-9280@ecf.pacerpro.com;LSaltzman@jenner.com;docketing@Jenner.com
- United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov
- Jessica Vogel jvogel@sulmeyerlaw.com, jvogel@ecf.inforuptcy.com;mviramontes@sulmeyerlaw.com
- Corey R Weber ecf@bg.law, cweber@bg.law
- Steven Werth swerth@sulmeyerlaw.com, asokolowski@sulmeyerlaw.com;mviramontes@sulmeyerlaw.com;asokolowski@ecf.inforuptcy.com;swerth@ecf.inforuptcy.com

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:

Howard Grobstein (Chief Restructuring Officer) hgrobstein@gtfas.com

SERVED BY E-MAIL

Mark S. Horoupian mhoroupian@sulmeyerlaw.com

Steve Williams steve@lanecapital.org

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Monte Herring mepsherring@gmail.com

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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:
3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*): **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*) **April 24, 2019**, 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*) **April 24, 2019**, 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.

The Hon. Scott C. Clarkson
United States Bankruptcy Court
411 West Fourth Street, Suite 5130
Santa Ana, CA 92701-4593

Office of the Treasurer-Tax Collector
4080 Lemon Street
Riverside, CA 92501

Citinvest, Inc.
Attn: Dana Haynes
4340 Von Karman Ave Ste 110
Newport Beach, CA 92660

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*) _____, 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 24, 2019	Gabriela Gomez-Cruz	/s/ Gabriela Gomez-Cruz
<u>Date</u>	<u>Printed Name</u>	<u>Signature</u>

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Kyra E Andrassy kandrassy@swelawfirm.com, csheets@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- James C Bastian jbastian@shbllp.com
- Jess R Bressi jess.bressi@dentons.com, kimberly.sigismondo@dentons.com
- Richard Bunt richbunt@gmail.com
- Frank Cadigan frank.cadigan@usdoj.gov
- Michael W Davis mdavis@bg.law, ecf@bg.law
- John P Dillman houston_bankruptcy@publicans.com
- Lei Lei Wang Ekvall lekvall@swelawfirm.com, csheets@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- Oscar Estrada oestrada@ttc.lacounty.gov
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- Roger F Friedman rfriedman@rutan.com
- Nichole Glowin nglowin@wrightlegal.net, BKUDGeneralupdates@wrightlegal.net
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- Wayne R Terry wterry@hemar-rousso.com
- Todd C Toral ttoral@jenner.com, todd-toral-9280@ecf.pacerpro.com;LSaltzman@jenner.com;docketing@Jenner.com
- United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov
- Jessica Vogel jvogel@sulmeyerlaw.com, jvogel@ecf.inforuptcy.com;mviramontes@sulmeyerlaw.com
- Corey R Weber ecf@bg.law, cweber@bg.law
- Steven Werth swerth@sulmeyerlaw.com, asokolowski@sulmeyerlaw.com;mviramontes@sulmeyerlaw.com;asokolowski@ecf.inforuptcy.com;swerth@ecf.inforuptcy.com

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:

Howard Grobstein (Chief Restructuring Officer) hgrobstein@gtfas.com

SERVED BY E-MAIL

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