

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Vahe Khojayan (SBN261996) KG LAW, APC 1010 N. Central Ave, Ste 450, Glendale, CA 91202 Tel: 818-280-4280 Fax: 818-280-4281 Email: vahe@kglawapc.com <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Debtor Tikran Eritsyan	FOR COURT USE ONLY
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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO VALLEY DIVISION**

In re: TIKRAN ERITSYAN Debtor(s).	CASE NO.: 1:20-bk-10924-VK CHAPTER: 11 NOTICE OF SALE OF ESTATE PROPERTY
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Sale Date: 11/05/2020	Time: 1:30 pm
Location: Courtroom 301, 21041 Burbank Blvd, Woodland Hills, CA 91367	

Type of Sale: Public Private **Last date to file objections:** 10/22/2020

Description of property to be sold: 15632 Viewridge Lane, Granada Hills, CA 91344
See Exhibit A attached hereto

Terms and conditions of sale:
15632 Viewridge Lane, Granada Hills, CA 91344 is being sold free and clear of any interest in such property.

Proposed sale price: \$ 600,000.00

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 attached page 1,

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

Date: November 5, 2020

Time: 1:30PM

Location: Courtroom 301, 21041 Burbank Blvd, Woodland Hills, CA 91367

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

Vahe Khojayan (SBN 261996)

KG LAW

1010 N. Central Ave., Suite 450

Glendale, CA 91202

Tel: (818) 280-4280

Fax: (818) 280-4281

vahe@kglawapc.com

Date: 10/05/2020

PROPOSED BIDDING PROCEDURES

The proposed bid procedures are intended to permit a fair and efficient, competitive sale of the 15632 Viewridge Lane, Granada Hills, CA 91344 ("Property"), and to identify competing and alternative bids. The bid procedures recognize Debtor's fiduciary obligations to maximize sale value and, as such, do not impair Debtor's ability to consider all qualified bid procedures as necessary or appropriate to maximize value for the bankruptcy estate. The proposed bid procedures consist of the following provisions:

Qualified Bids: Only a qualified bidder ("Qualified Bidder") may bid on Property. Argam Yeghiazaryan is deemed to have satisfied all of the bidding conditions. Debtor will determine whether any other potential buyer qualifies as a Qualified Bidder. In order to be considered as a Qualified Bidder, a prospective purchaser must deliver to Debtor, care of KG LAW, APC, by no later than three court days prior to the date of the hearing on this Motion to Sell, unless a different deadline is set by the Court ("Bid Deadline"): (a) a non-contingent offer to purchase the Property; (b) written proof of the prospective purchaser's financial ability to close the transaction; and (c) \$18,000.00 deposit in the form of a cashier's check, payable to KG LAW, APC, general insolvency counsel for Debtor-in-possession ("Overbid Deposit"). The bid shall not be subject to any financing contingency, due diligence contingency, or any contingency relating to internal approvals or consents. Debtor reserves the right to request additional information/documents that may assist debtor in evaluating, among other things, the bidder's ability to consummate a transaction, bidder's legal authority to bid and/or bidder's ability to fulfill its obligations in connection therewith. If no qualified bids are received by the Bid Deadline, then Argam Yeghiazaryan will be deemed the successful bidder, and Debtor will immediately pursue issuance of an order authorizing sale of the Property to Argam Yeghiazaryan.

Bidding Increments: An initial competing bid must exceed the \$600,000 purchase price by at least \$5,000.00. A competing Bid may not provide for the competing bidder to receive a break up fee, topping fee, expense reimbursement, or other similar fee or arrangement. At the auction, each subsequent bid shall be in increments of no less than \$5,000.00 of as otherwise agreed by the bidders or set by the Court.

Auction: The Qualified Bidders, including Argam Yeghiazaryan must appear in person or through duly authorized representative at the hearing of the Motion to Sell. The auction sale of the Property will be conducted at the hearing of the Motion to Sell. Only Qualified Bidders, including Argam Yeghiazaryan will be entitled to bid at the hearing, If more than one bidder appears at the auction, the bidding order will be randomly selected.

Consummation of Sale: Upon conclusion of the auction, Debtor will decide which bid is the best bid ("Successful Bid"). In the event the sale of the Property to the Successful Bidder fails to occur by reason of any failure of performance, breach or default by the Successful Bidder, then the Successful Bidder's deposit will be automatically forfeited to the Debtor's bankruptcy estate as liquidated damages.

Backup Bid: Upon conclusion of the auction, debtor may also decide which bid is the second-best bid ("Backup Bid"). If the Successful Bidder fails to close the sale of the Property, then Debtor may sell the Property to the Qualified Bidder who submitted the Backup Bid without further court order, in which event, the Backup Bidder must pay the amount of Backup Bid. If the sale of the Property to the Backup Bidder fails to occur by reason of any failure of performance, breach or default by the Backup Bidder, then the Backup Bidder's deposit will be automatically forfeited to the Debtor's bankruptcy estate as liquidated damages.

Return of Overbid Deposits: The Overbid Deposit from the Successful Bidder or the Backup Bidder will become non-refundable upon conclusion of the hearing. The Overbid Deposit of each unsuccessful bidder will be returned immediately. The Overbid Deposit submitted by the Backup Bidder will be returned promptly following the close of escrow of the sale of the Property to the Successful Bidder.

EXHIBIT A
Legal Description

The land hereinafter referred to is situated in the City of Los Angeles, County of Los Angeles, State of California, and is described as follows:

A Condominium comprised of:

Parcel 1A:

Unit No. 36, consisting of certain airspace and surface elements, as shown and described in the Condominium Plan for Granada Ridge, which plan was recorded on August 08, 1978 as Instrument No. 78-869273, Official Records of Los Angeles County, California.

Parcel 1B:

An undivided one-ninety-seventh (1/97th) fee simple interest as a tenant in common in and to Lot 1, of Tract No. 32329, in the City of Los Angeles, County of Los Angeles, State of California, as per Map recorded in Book 898 Pages 56 to 58 inclusive of Maps, in the Office of the County Recorder of said County.

Except therefrom Units 1 through 97 inclusive as shown on the plan.

Except therefrom the oil, gas, minerals, and other hydrocarbon substances lying below the surface of said land, as provided in Deeds of Record.

Parcel 1C:

Non-exclusive easements, for access, ingress, egress, use, enjoyment, drainage, encroachment, maintenance, repairs and for other purposes, all as shown in the plan, and as described in the declaration

Parcel 1D:

An exclusive easement appurtenant to Parcels No. 1 and 2 described above, for use and occupancy for front entry way or stairway purposes, defined as restricted common areas in the declaration and assigned to said Parcels No. 1 and No. 2 in the Condominium Plan.

APN: 2605-002-156

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:

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)* 10/05/2020, 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:

Katherine Bunker on behalf of U.S. Trustee United States Trustee (SV): kate.bunker@usdoj.gov

Vahe Khojayan on behalf of Debtor Tikran Eritsyan: vahe@kglawapc.com,

marty.phillips@att.net; daren@schlechterlaw.com, assistant@schlechterlaw.com, ustpreion16.wh.ecf@usdoj.gov

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* 10/05/2020, 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)* 10/05/2020, 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.

10/05/2020 Menua Yesayan
Date *Printed Name*

/s/ Menua Yesayan
Signature

AIAA Home Holdings, LLC
701 N. Brand Blvd, Ste 180
Glendale, CA 91203

California TD Specialists
8190 East Kaiser Blvd
Anaheim, CA 92808

Costco Anywhere Visa Card
Attn: Bankruptcy
Po Box 6500
Sioux Falls, SD 57117

FCI Lender Services, Inc.
PO Box 27370
Anaheim, CA 92809-0112

Mr. Cooper
PO Box 60516
City of Industry, CA 91716-0516

Red Dragon Investments & Platinum B
3151 Cahuenga Blvd, Ste 300
Los Angeles, CA 90068

LOS ANGELES COUNTY TREASURER AND
TAX COLLECTOR
PO BOX 54110
LOS ANGELES CA 90054-0110

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Red Dragon Investment & Platinum Business
Mgmt.
C/O FCI Lender Services, Inc.
P.O. Box 27370
Anaheim Hills, California 92809-0112

Granada Ridge HOA
C/O Bartlein & Co.
25031 W. Avenue Stanford, Ste 110
Valencia CA 91355

AIAA Home Holdings, LLC
701 N. Brand Blvd, Ste 180
Glendale, CA 91203