

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  KEITH PATRICK BANNER (SBN 259502) KBanner@GreenbergGlusker.com GREENBERG GLUSKER FIELDS CLAMAN & MACHTINGER LLP 2049 Century Park East, Ste. 2600 Los Angeles, California 90067 Telephone: 310.553.3610 Fax: 310.553.0687  <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Rosendo Gonzalez, Chapter 7 Trustee	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re: CHRISTOPHER J STASKEWICZ          Debtor(s).	CASE NO.: 2:21-bk-18172-BR  CHAPTER: 7    <p style="text-align: center;"><b>AMENDED NOTICE OF SALE OF ESTATE PROPERTY</b></p>
<b>Sale Date:</b> October 3, 2023	<b>Time:</b> 10:00 a.m.
<b>Location:</b> Courtroom 1668, 255 East Temple Street, Los Angeles, CA 90012	

**Type of Sale:**  Public  Private      **Last date to file objections:** September 8, 2023

**Description of property to be sold:**

Bankruptcy estate's claims against the Debtor Christopher J. Staskewicz (the "Debtor"), the Debtor's non-filing spouse Leigh Evin Staskewicz ("Mrs. Staskewicz"), and/or possibly currently unknown transferees under chapter 5 of the Bankruptcy Code, including but not limited to claims arising under 11 U.S.C. §§ 544, 548, 549 and 550 relating to: (a) the pre-petition financial affairs between the Debtor and Mrs. Staskewicz; (b) the pre-petition transmutation and transfer of community property assets caused by the Debtor and Mrs. Staskewicz; (c) pre-petition and post-petition transfers from the Debtor's bank accounts to those purportedly held by Mrs. Staskewicz; (d) pre-petition and post-petition transfers of tax refunds relating to tax returns filed jointly by the Debtor and Mrs. Staskewicz; (e) pre-petition transfers relating to properties located in San Luis Obispo County commonly known as 10196 and 10199 Suey Creek Road, Santa Maria, CA 93454; and (f) financial transactions between the Debtor and entities affiliated with the Debtor, including Progressive Power Group, Inc. and 72andSunny Partners, LLC (collectively, the "Claims").



**Terms and conditions of sale:**

The Chapter 7 Trustee proposes to sell the Claims to Ross Butcher ("Buyer") pursuant to the terms of that certain Purchase Agreement (the "Purchase Agreement") a copy of which is attached as Exhibit 1 to the Motion. As consideration for the purchase of the Claims, Buyer is providing the following consideration to the estate: (1) \$10,000 down payment; (2) 30% of gross recovery on the Claims to be paid to the estate; and (3) Buyer will subordinate his unsecured claim to all other allowed claims in the bankruptcy case.

**Proposed sale price:** See above

**Overbid procedure (if any):**

1. On, or before the date of the Sale Hearing, potential over-bidders must provide a deposit of \$80,000.00 (the "Required Deposit") in the form of a cashier's check payable to "Rosendo Gonzalez, Chapter 7 Trustee". If the Required Deposit is timely made and an overbid is made, if Buyer intends to submit his own overbid at the Sale Hearing, his prior deposit made under the Purchase Agreement shall constitute a Required Deposit for the purposes of these Proposed Bid Procedures.
2. On, or before the date of the Sale Hearing, potential over-bidders must provide evidence (e.g., a current bank statement or pre-approval letter) of their ability to fund the Minimum Overbid (defined below) acceptable to the Trustee in the Trustee's sole discretion.
3. By submitting an overbid, potential overbidders agree to be bound by these Proposed Bid Procedures and explicitly agrees that, in the event that the proposed overbidder is declared the party submitting the highest and best bid for the Claims (a "Winning Bidder") at the Sale Hearing, the Winning Bidder agrees to purchase the Claims on an as is, whereas basis, with no representations or warranties whatsoever.
4. For the purposes of these Proposed Bid Procedures only, the cash value of Buyer's purchase of the Claims under the Purchase Agreement shall be deemed to be \$310,000 (the "Contract Value").
5. To constitute a qualified overbid, proposed overbidders must make an all-cash overbid of no less than \$320,000 (the "Minimum Overbid").
6. Bid increments at the sale hearing shall be no less than \$10,000.
7. If Buyer submits an overbid at the Sale Hearing, Buyer's overbid in excess of the Contract Value must be submitted in cash.
8. The balance due from the Winning Bidder shall be paid to the Trustee in the form of a cashier's check no later than seven (7) calendar days following the Sale Hearing.
9. A Winning Bidder's Required Deposit shall be forfeited and paid to the bankruptcy estate if the applicable Winning Bidder fails to timely close.
10. Any overbidder or Buyer, as applicable, may request to be irrevocably designated as a back-up bidder: (a) in the amount of their last and highest bid; or (b) as to Buyer only, pursuant to the terms of the Purchase Agreement in the event that Buyer elects not to submit an overbid; and, if so designated by the Court, their Required Deposit will be held and shall be forfeited to the bankruptcy estate if the backup bidder is subsequently deemed by the Trustee to be the Winning Bidder and they fail to close the sale within seven (7) calendar days of written notification to their counsel that the backup bidder has been deemed the Winning Bidder.

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

N/A

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

Keith Patrick Banner, Esq., Greenberg Glusker Fields Claman & Machtinger LLP, [KBanner@GreenbergGlusker.com](mailto:KBanner@GreenbergGlusker.com), 310-553-3610.

Date: 9/14/2023

## 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:  
2049 Century Park East, Ste. 2600 Los Angeles, CA 90067

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)* 9/14/2023, 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:

- Keith Patrick Banner kbanner@greenbergglusker.com, vafanasieva@greenbergglusker.com;calendar@greenbergglusker.com
- Ryan Forrest POCInquiries@bonialpc.com
- Rosendo Gonzalez (TR) rgonzalez@ecf.axosfs.com, rossgonzalez@gonzalezplc.com;jzavala@gonzalezplc.com;zig@gonzalezplc.com;gig@gonzalezplc.com
- Daren M Schlecter daren@schlecterlaw.com, assistant@schlecterlaw.com
- James R Selth jselth@wztslaw.com, jselth@yahoo.com;maraki@wztslaw.com;sfritz@wztslaw.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)* 9/14/2023, 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)* 9/14/2023, 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.

9/14/2023  
Date

Julie King  
Printed Name

/s/ Julie King  
Signature