

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Victor A. Sahn (CA Bar No. 97299) victor.sahn@gmlaw.com Steve Burnell (CA Bar No. 286557) steve.burnell@gmlaw.com GREENSPOON MARDER LLP 1875 Century Park East, Suite 1900 Los Angeles, CA 90071 Telephone: 213.626.2311 Facsimile: 954.771.9264  <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: 9300 Wilshire LLC, Debtor in Possession	FOR COURT USE ONLY
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<b>UNITED STATES BANKRUPTCY COURT</b>	
<b>CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re:  9300 WILSHIRE LLC   Debtor(s).	CASE NO.: 2:23-bk-10918-VZ CHAPTER: 11  <b>AMENDED NOTICE OF SALE OF ESTATE PROPERTY</b>

<b>Sale Date:</b> 09/16/2024	<b>Time:</b> 1:00 pm
<b>Location:</b> Courtroom 1368, 255 E. Temple Street, Los Angeles, CA 90012	

**Type of Sale:**  Public  Private      **Last date to file objections:** 09/09/2024

**Description of property to be sold:** the Estate's rights, title and interest in 22.5% fee simple interest (the "Asset") in the real properties, improvements, and personal property located at 174 Kinney Street and 169-175 Pier Avenue, Santa Monica, CA 90505 (collectively, the "Real Properties") (APN 4288-008-008). The Estate's fractional interest in the Real Properties is held in tenancy in common with 362 Camden Fee LLC, a California limited liability company, BH Karka LLC, a California limited liability company, and EJT Kinney Pier, LLC (collectively, the "Co-Owners").

**Terms and conditions of sale:** Kinney Compound, LLC and Pier Pocket LLC (together, "Purchaser") will purchase the the Real Properties for \$13,600,000, subject to certain customary adjustments, prorations, and credits, including up to \$400,000 for the security deposit and prepaid rent ("Overall Purchase Price"). The Estate will receive its prorated 22.5% share of the Overall Purchase Price based on the sale of the Asset. The earnest money deposit is \$200,000 and the breakup fee is up to \$100,000. Debtor seeks findings under Section 363(m) for Purchaser and waiver of 14-day stay.

**Proposed sale price:** \$ 13,600,000.00

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):** None. The Sale will not be subject to overbid per the terms of the Purchase and Sale Agreement dated August 23, 2024 (the "PSA") between Debtor, Co-Owners, and Purchaser. A copy of the PSA is attached as Exhibit 1 to the Motion.

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

Debtor intends to sell the Asset under 11 U.S.C. § 363(f) free and clear of all interests, including all liens, claims, and encumbrances other than liens for unpaid future property taxes.

Hearing Information:

Date: September 16, 2024

Time: 1:00 p.m.

Location: Courtroom 1368, 255 E. Temple Street, Los Angeles, CA 90012

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

Victor A. Sahn  
Steve Burnell  
Greenspoon Marder LLP  
1875 Century Park East, Suite 1900  
Los Angeles, CA 90071  
Telephone: 213.626.2311  
Email: victor.sahn@gmlaw.com, steve.burnell@gmlaw.com

Date: 09/05/2024

## 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 1875 Century Park East, Suite 1900, Los Angeles, CA 90067.

A true and correct copy of the foregoing document entitled (specify): **AMENDED 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) September 5, 2024 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following

- **Todd M Arnold** tma@lnbyg.com
- **Melissa Boey** melissa.boey@morganlewis.com
- **Steve Burnell** Steve.Burnell@gmlaw.com, sburnell@ecf.courtdrive.com; sburnell@ecf.inforuptcy.com; cheryl.caldwell@gmlaw.com; denise.walker@gmlaw.com
- **Jason M Caruso** jason.caruso@ndf.com
- **Michael J Gomez** mgomez@frandzel.com, dmoore@frandzel.com
- **Asa S Hami** asa.hami@gmlaw.com, ahami@ecf.courtdrive.com; patricia.dillamar@gmlaw.com; pdillamar@ecf.courtdrive.com
- **Maya Hill** mhill@ttc.lacounty.gov
- **Joseph Isenstadt** joseph.isenstadt@doj.ca.gov
- **Clifford P Jung** clifford@jyllp.com, ry@jyllp.com; jessica@jyllp.com
- **Daniel A Lev** daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com; dlev@ecf.courtdrive.com
- **Kelly L Morrison** kelly.l.morrison@usdoj.gov
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- **Abigail V O'Brient** aobrient@cov.com, docketing@cov.com
- **Aron M Oliner** roliner@duanemorris.com
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- **Alan Schindler** alan.schindler@gmlaw.com, lindsay.broderick@gmlaw.com
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- **Alan G Tippie** Alan.Tippie@gmlaw.com, atippie@ecf.courtdrive.com; Karen.Files@gmlaw.com, patricia.dillamar@gmlaw.com, denise.walker@gmlaw.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Craig A Wolfe** craig.wolfe@morganlewis.com
- **Hatty K Yip** hatty.yip@usdoj.gov, hatty.k.yip@usdoj.gov

Service information continued on attached page.

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

On (date) September 5, 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.

Hon. Vincent Zurzolo  
United States Bankruptcy Court  
Central District of California  
Edward R. Royal Federal Building and Courthouse  
255 E. Temple Street, Suite 1360 / Courtroom 1368  
Los Angeles, CA 90012

**Counsel for United States Trustee**  
Michael Jones  
Kelly L. Morrison  
Office of the United States Trustee  
915 Wilshire Blvd. Suite 1850  
Los Angeles, CA 90017

**Counsel for Valley National Bank fka Bank**

**Leumi USA**

Ron M. Oliner  
Duane Morris LLP  
Spear Tower  
One Market Plaza, Suite 2200  
San Francisco, CA 94105-1127

**Registered Agent/Counsel for 362 Camden Fee**

**LLC and BH Karka LLC**

Marc Cohen, Esq.  
Cohen Law Group, APC  
541 S. Spring Street, Suite 1208  
Los Angeles, CA 90013

**Registered Agent/Counsel for EJT Pier Kinney LLC**

Eli Taban, Esq.  
1100 Glendon Avenue, 15<sup>th</sup> Floor  
Los Angeles, CA 90024

**Counsel for Kinney Compound, LLC and Pier Pocket LLC (“Purchaser”)**

Howard J. Steinberg  
Greenberg Traurig, LLP  
1840 Century Park East, Suite 1900  
Los Angeles, CA 90067-2121

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) 9/5/24, 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.

**Via Email**

**Counsel for United States Trustee**

Michael Jones  
Kelly L. Morrison  
**Email:** Michael.Jones4@usdoj.gov  
Kelly.L.Morrison@usdoj.gov

**Counsel for Valley National Bank fka Bank**

**Leumi USA**

Ron M. Oliner  
Duane Morris LLP  
**Email:** roliner@duanemorris.com

**Registered Agent/Counsel for 362 Camden Fee**

**LLC and BH Karka LLC**

Marc Cohen, Esq.  
Cohen Law Group, APC  
**Email:** marc@clgapc.com

**Registered Agent/Counsel for EJT Pier Kinney LLC**

Eli Taban, Esq.  
**Email:** eli@ejtventures.com

**Counsel for Kinney Compound, LLC and Pier Pocket LLC (“Purchaser”)**

Howard J. Steinberg  
**Email:** steinbergh@gtlaw.com

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.

September 5, 2024

Patricia Dillamar

/s/ Patricia Dillamar

Date

Printed Name

Signature

**Additional Service Information**

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

**20 Largest Unsecured Creditors**

CBRE  
Attn Neal Golub  
2000 Avenue of the Stars, Suite 800  
Los Angeles, CA 90067-2110

Cohen Law Group  
Attn Marc Cohen  
541 S. Spring Street, Suite 1208  
Los Angeles, CA 90013

Englander Knabe Allen & Associates  
LLC  
Attn Erik Rose  
801 S. Figueroa St, Ste 1050  
Los Angeles, CA 90017-5507

KFA  
Attn John Arnold  
3573 Hayden Ave  
Culver City, CA 90232-2412

KPFF  
Attn Sharad Ganja  
700 S Flower St, Ste 2100  
Los Angeles, CA 90017-4208

Manella & Company  
Attn Limo Amrani  
6300 Wilshire Blvd. Suite 2030  
Los Angeles, CA 90048-5268

Newmeyer Dillion  
Attn Michael Shonafelt  
895 Dove St, 5th FL  
Newport Beach, CA 92660-2999

Rutan Tucker  
Attn Doug Dennington  
18575 Jamboree Rd, 9th FL  
Irvine, CA 92612-2559

Sturgis Holdings LLC  
Attn Jason Sturgis  
1515 Foothill Road  
Gardnerville Nevada 89460

**Attorney for Sturgis Holdings, LLC**

David T. Moran, Esq.  
Manatt Phelps & Phillips  
2049 Century Park Est, Ste. 1700  
Los Angeles, CA 90067

Lisa Haage  
California Coastal Commission  
Chief of Enforcement  
455 Market Street, Ste. 300  
San Francisco, CA 91405

Mark Miller  
President & CEO  
AES Redondo Beach L.L.C.  
690 N. Studebaker Road  
Long Beach, CA 90803

AES Redondo Beach LLC  
Attn: Joseph Strines  
One Monument Circle  
Indianapolis, Indiana 46204

Joshua Dorchak on behalf of  
Creditor AES Redondo Beach, L.L.C  
MORGAN, LEWIS & BOCKIUS LLP  
101 Park Avenue  
New York, NY 10178

Los Angeles County Treasurer and  
Tax Collector  
Attn: Bankruptcy Unit  
PO Box 54110  
Los Angeles CA 90054-0110

California Coastal Commission  
45 Fremont, Suite 2000  
San Francisco, CA 95105-2219

East West Bank  
Attn: Curtis C. Jung  
c/o Jung & Yuen, LLP  
2667 E Colorado Blvd., 2nd Fl  
Pasadena, CA 91107

**Additional Creditors**

Jones Day  
Attn Thomas Donnelly  
555 California Street 26th Floor  
San Francisco, CA 94104-1503

1112 Investment Company, LLC  
Attn: Ely Dormy  
9744 Wilshire Blvd, #203  
Beverly Hills, CA 90212-1812

1247 3rd Street LLC  
Attn Leonid Postilion  
9744 Wilshire Blvd., Ste. 203  
Beverly Hills, CA 90212-1812

1650 Veteran, LLC  
Attn: Ely Dormy  
9744 Wilshire Blvd, #203  
Beverly Hills, CA 90212-1812

362 Camden Fee, LLC  
Attn Daniel Dromy  
9744 Wilshire Blvd., Ste. 203  
Beverly Hills, CA 90212-1812

505 Investment Company, LLC  
Attn: Ely Dromy  
9744 Wilshire Blvd, #203  
Beverly Hills, CA 90212-1812

5th Street Investment Company,  
LLC  
Attn: Ely Dromy  
9744 Wilshire Blvd, #203  
Beverly Hills, CA 90212-1812

9300 Wilshire Fee, LLC  
Attn: Ely Dromy  
9744 Wilshire Blvd, #203  
Beverly Hills, CA 90212-1812

Manela & Company  
Attn Limor Amrani  
6300 Wilshire Blvd. Suite 2030  
Los Angeles, CA 90048-5268

AES Redondo Beach LLC  
1100 N Harbor Dr  
Redondo Beach CA 90277-2017

AES Redondo Beach LLC  
Attn Marc Miller  
690 Studebaker Rd  
Long Beach CA 90803-2221

AES Redondo Beach LLC  
co AER US Services LLC  
1065 Woodman Dr  
Dayton OH 45432-1423

AES Redondo Beach, L.L.C.  
Attn Eric Pendergraft Vice President  
690 Studebaker Road  
Long Beach, CA 90803-2221

AES Redondo Beach, LLC  
co AER US Services LLC  
1065 Woodman Drive  
Dayton, Ohio 45432-1423

Alex Hotel LLC  
Attn: Marc Cohen  
541 S. Spring Street, Suite 1208  
Los Angeles, CA 90013-1667

BH Karka, LLC  
Attn: Ely Dromy  
9744 Wilshire Blvd, #203  
Beverly Hills, CA 90212-1812

California State Water Resources  
Control Boa  
1001 I Street  
Sacramento, CA 95814-2828

City of Redondo Beach  
Attn Michael Web City Attorney  
415 Diamond Street  
Redondo Beach, CA 90277-2836

Mintz Levin Cohn Ferris Glovsky and  
Popeo, P  
Attn Jonathan Welner  
2043 Century Park East Suite 300  
Los Angeles, CA 90067

Sturgis Holdings LLC  
Agent For Service of Process  
Attn Terrie Prodhon  
768 Pleasant Valley Rd, Ste 300  
Diamond Springs, CA 95619-9260

David Dromy  
Attn: David Dromy  
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Beverly Hills, CA 90212-1812

Dromy 1995 Family Trust  
Attn Ely Dromy  
9744 Wilshire Blvd., Ste. 203  
Beverly Hills, CA 90212-1812

E.D. Flores, LLC  
Attn: Ely Dromy  
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EJT Kinney Pier, LLC  
co EJT Ventures, LLC  
10433 Wilshire Blvd #1206  
Los Angeles, CA 90024-4635

EJT Wilshire Linden, LLC  
co BLP  
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East West Bank  
Attn May Kwong, FVP-Relationship  
Manager  
135 N. Los Robles Ave., 6th Fl.  
Pasadena, CA 91101-4526

East West Bank  
Attn Michael Joe  
135 N Los Robles Ave 6th Flr  
Pasadena CA 91101-4526

Valley National Bank fka  
Bank Leumi USA  
Attn Michael Reed Vice President  
555 West 5th St Ste 3300  
Los Angeles CA 90013-1073

Ellison Schneider Harris & Donlan  
Attn Jeffrey Harris  
2600 Capital Avenue Ste 400  
Sacramento, CA 95816-5931

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

GenOn California South GP LLC  
co Jones Day Attn Thomas Donnelly  
555 California Street 26th Floor  
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Valley National Bank  
Attn Michael Reed, Vice President  
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CBRE, Inc.  
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Los Angeles, CA 90071-2801

Employment Development Dept.  
Bankruptcy Group MIC 92E  
P.O. Box 826880  
Sacramento, CA 94280-0001

Morgan Lewis & Bockius LLP  
Attn Charles J. Malaret  
300 South Grand Avenue 22nd Floor  
Los Angeles, CA 90071-3132

Franchise Tax Board  
Bankruptcy Section MS A340  
PO Box 2952  
Sacramento, CA 95812

Outdoor Billboard, LLC  
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Beverly Hills, CA 90212-1812

Peak Alcott, LLC  
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9744 Wilshire Blvd, #203  
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East West Bank  
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Pasadena CA 91101-4526

SLH Fund, LLC  
Attn: Marc Cohen  
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