

|  |                           |
|--|---------------------------|
| <p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>Peter J. Mastan, Trustee<br/>peter.mastan@dinsmore.com<br/>550 S. Hope St., Suite 1765<br/>Los Angeles, CA 90071<br/>Telephone: (213) 335-7739</p> <p>Ch. 7 Trustee of the Bankruptcy Estate of<br/>Alejandro Zuniga and Marisol Santoyo</p> <p><input type="checkbox"/> Individual appearing without attorney<br/><input type="checkbox"/> Attorney for:</p> | <p>FOR COURT USE ONLY</p> |
|--|---------------------------|

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

|   |  |
|---|--|
| <p>In re:</p> <p>ALEJANDRO ZUNIGA<br/>MARISOL SANTOYO,</p> <p style="text-align: right;">Debtor(s).</p> | <p>CASE NO.: 2:24-bk-10257-BB<br/>CHAPTER: 7</p> <p style="text-align: center;"><b>NOTICE OF SALE OF ESTATE PROPERTY</b></p> |
|---|--|

|   |              |
|---|--------------|
| <b>Sale Date:</b>   | <b>Time:</b> |
| <b>Location:</b> 255 E. Temple St., Los Angeles, CA 90012 |              |

**Type of Sale:**  Public  Private      **Last date to file objections:** 07/28/2024

**Description of property to be sold:**  
2015 Chevy Silverado

**Terms and conditions of sale:**

The Trustee will sell the vehicle to Carmax for \$26,400 (or within 20% of that value). To the extent any person or entity would like to purchase the vehicle for \$26,400 or more, it must notify the Trustee prior to the opposition Deadline (July 28, 2024) and provide to the Trustee a cashier's check in the full amount of the purchase price (i.e., \$26,400). If multiple offers are received, then the motion will be set for hearing and an auction conducted at that hearing.

**Proposed sale price:** \$ 26,400.00

---

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):**

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

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

Peter J. Mastan, Trustee  
550 S. Hope St., Suite 1765  
Los Angeles, CA 90071  
Telephone: (213) 335-7739  
travis.terry@dinsmore.com

Date: 07/11/2024

1 Peter J. Mastan, Trustee  
*peter.mastan@dinsmore.com*  
2 550 S. Hope St., Suite 1765  
Los Angeles, California 90071  
3 Telephone: 213-335-7737

4 Chapter 7 Trustee of the Bankruptcy Estate  
of Alejandro Zuniga and Marisol Santoyo  
5  
6  
7

8 **UNITED STATES BANKRUPTCY COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **LOS ANGELES DIVISION**

11 In re:

12  
13 ALEJANDRO ZUNIGA  
MARISOL SANTOYO,

14  
15 Debtor(s).  
16

Case No. 2:24-bk-10257-BB

Chapter 7

**NOTICE OF FILING OF MOTION  
FOR AUTHORITY TO SELL THE  
2015 CHEVY SILVERADO TO  
CARMAX**

Date:

Time:

Ctrm: Courtroom 1539  
255 E. Temple Street  
Los Angeles, CA 90012

Judge: Hon. Sheri Bluebond

[No Hearing Set or Required]

22  
23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **TO THE HONORABLE SHERI BLUEBOND, UNITED STATES BANKRUPTCY JUDGE,**  
2 **THE DEBTORS, THE OFFICE OF THE UNITED STATES TRUSTEE, ALL**  
3 **SCHEDULED CREDITORS OF THE ESTATE AND THOSE FILING PROOFS OF**  
4 **CLAIM, ALL OTHER INTERESTED PARTIES; AND THEIR RESPECTIVE COUNSEL**  
5 **OF RECORD, IF ANY:**

6 **NOTICE IS HEREBY GIVEN** that, on July 11, 2024, Peter J. Mastan, Chapter 7 trustee  
7 (the “Trustee”) of the bankruptcy estate (the “Estate”) of Alejandro Zuniga and Marisol Santoyo  
8 (the “Debtors”), filed in the United States Bankruptcy Court located at 255 East Temple Street,  
9 Los Angeles, CA 90012, the Honorable Sheri Bluebond, United States Bankruptcy Judge  
10 presiding, a motion (the “Motion”) for an order that does each of the following:

11 (1) Approves the sale of the 2015 Chevy Silverado (VIN 3GCUKSEC6FG350070)  
12 (the “Vehicle”) to Carmax at a price within a 20% variance of an appraisal offer (in the amount of  
13 \$26,400) previously obtained from Carmax dated February 6, 2024.

14 (2) Directs the Debtors to sell the Vehicle directly to Carmax, and to turnover the  
15 proceeds of the sale (the “Proceeds”) to the Trustee immediately upon receipt.

16 (3) Authorizes the Trustee to pay the Debtors’ claimed exemption (in the amount of  
17 \$7,500) in the Vehicle out of the Proceeds.

18 (4) Determines that adequate notice of the Motion was given.

19 (5) Reserves Bankruptcy Court jurisdiction to enforce the Agreement.

20 (6) Waives the 14-day stay of orders for the disposition of Estate property set forth in  
21 Fed.R.Bankr.P. 6004(h).

22 **NOTICE IS FURTHER GIVEN** that the Motion is made pursuant to  
23 11 U.S.C. §§ 363(b) and 363(m), Federal Rules of Bankruptcy Procedure 2002 and 6004, and  
24 Local Bankruptcy Rules 6004-1 and 9013-1 on the grounds that the proposed sale is in the best  
25 interest of the Estate in that it will maximize the value to unsecured creditors of the Estate’s  
26 interest in the Vehicle.

27 **NOTICE IS FURTHER GIVEN** that the Motion is based on (a) this Notice of Filing of  
28 Motion; (b) the concurrently filed Notice of Motion and Motion, Memorandum of Points and

1 Authorities, Declaration of Peter J. Mastan, and Exhibits; (c) the pleadings on file with the Court  
2 of which the Court is requested to take judicial notice; and (d) such further evidence that may be  
3 properly submitted prior to or at any hearing on the Motion. At your own expense, you may  
4 obtain a complete copy of the Motion from the Court's file. Alternatively, you may obtain a free,  
5 electronic copy of the Motion by contacting Mr. Travis Terry at [travis.terry@dinsmore.com](mailto:travis.terry@dinsmore.com) and  
6 providing to Mr. Terry your email address.

7 *TO THE EXTENT ANY PERSON OR ENTITY WOULD LIKE TO PURCHASE THE*  
8 *VEHICLE FOR \$26,400 OR MORE, IT MUST NOTIFY THE TRUSTEE PRIOR TO THE*  
9 *OPPOSITION DEADLINE AND PROVIDE TO THE TRUSTEE A CASHIER'S CHECK IN THE*  
10 *FULL AMOUNT OF THE PURCHASE PRICE (I.E. \$26,400). IF MULTIPLE OFFERS ARE*  
11 *RECEIVED, THEN THE MOTION WILL BE SET FOR HEARING AND AN AUCTION*  
12 *CONDUCTED AT THAT HEARING.*

13 **NOTICE IS FURTHER GIVEN that, absent the filing of a timely opposition to the**  
14 **Motion and a timely request for hearing on the Motion, no hearing on the Motion will be**  
15 **held. Pursuant to Local Bankruptcy Rule 9013-1(o), any request for hearing and opposition**  
16 **to the Motion (including Memorandum of Points and Authorities and evidence in support**  
17 **thereof) must be in writing, and must be filed with the Court and served upon the Trustee,**  
18 **the Office of the United States Trustee, and the Debtors at the addresses set forth below not**  
19 **later than 14 days after the date of service of this notice, plus three additional days if you**  
20 **were served by mail, or pursuant to Fed.R.Civ.P. 5(b)(2)(D) or (F):**

21 **For Filing With the Court**

22 Clerk's Office  
23 United States Bankruptcy Court  
255 E. Temple Street, Room 940  
Los Angeles, California 90012

24 **For Service on Judge Bluebond**

25 Hon. Sheri Bluebond  
26 United States Bankruptcy Court  
Central District of California  
Edward R. Roybal Federal  
27 Building and Courthouse  
255 E. Temple Street, Suite 1534  
28 Los Angeles, CA 90012

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**For Service on the Trustee**

Peter J. Mastan, Trustee  
550 South Hope Street, Suite 1765  
Los Angeles, California 90071-2627

**For Service on Office of U.S. Trustee**

Office of the U.S. Trustee  
915 Wilshire Blvd., Suite 1850  
Los Angeles, CA 90017

**For Service on the Debtors**

Sundee M. Teeple, Esq.  
Winterbotham Parham Teeple, a PC  
101 E. Lincoln Ave., Suite 107  
Anaheim, CA 92805

and

Alejandro Zuniga  
Marisol Santoyo  
5750 Roosevelt Ave.  
South Gate, CA 90280

*NOTICE IS FURTHER GIVEN that, pursuant to Local Bankruptcy Rule 9013-1(h), failure to timely file and serve an objection may be deemed by the Court to be consent to granting the Motion.*

DATED: July 11, 2024

Respectfully submitted,

CHAPTER 7 TRUSTEE

By: /s/ Peter J. Mastan  
Peter J. Mastan  
Chapter 7 Trustee of the Bankruptcy  
Estate of Alejandro Zuniga and  
Marisol Santoyo

**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: 550 S. Hope Street, Suite 1765, Los Angeles, CA 90071

A true and correct copy of the foregoing document described as: **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 indicated below:

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)** - Pursuant to controlling General Order(S) and Local Bankruptcy Rule(s) (“LBR”), the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 11, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses indicated below:

- **Chad L Butler** caecf@tblaw.com
- **Peter J Mastan (TR)** pmastan@iq7technology.com; travis.terry@dinsmore.com; ecf.alert+Mastan@titlexi.com
- **Amitkumar Sharma** amit.sharma@aisinfo.com
- **Sundee M Teeple** wptmrv@4bankruptcy.com, 2934@notices.nextchapterbk.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov

\_\_\_\_\_ Service information continued on attached page

**II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL** (indicate method for each person or entity served): On **July 11, 2024** I served the following person(s) and/or entity(ies) at the last known address(es) 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/or with an overnight mail service 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.

**DEBTOR(S)**  
Alejandro Zuniga  
Marisol Santoyo  
5750 Roosevelt Ave.  
South Gate, CA 90280

**UNITED STATES BANKRUPTCY COURT**  
Hon. Sheri Bluebond  
United States Bankruptcy Court  
Central District of California  
Edward R. Roybal Federal  
Building and Courthouse  
255 E. Temple Street, Suite 1534  
Los Angeles, CA 90012

\_\_\_ Service information continued on attached page

**III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL** (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **July 11, 2024** I served the following person(s) and/or entity(ies) by personal delivery, 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 mailing 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 of America that the foregoing is true and correct.

**July 11, 2024**  
Date

**TRAVIS MICHAEL TERRY**  
Type name

/s/ Travis Michael Terry  
Signature