

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Leonard M. Shulman - Bar No. 126349 Lynda T. Bui - Bar No. 201002 SHULMAN BASTIAN FRIEDMAN & BUI LLP 100 Spectrum Center Drive, Suite 600 Irvine, California 92618 Telephone: (949) 340-3400 Facsimile: (949) 340-3000 Email: LShulman@shulmanbastian.com; LBui@shulmanbastian.com <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Charles W. Daff, Chapter 7 Trustee	FOR COURT USE ONLY
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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION**

In re: INTERIOR SOLUTIONS, INC., Debtor(s).	CASE NO.: 6:22-bk-14774-RB CHAPTER: 7 <p style="text-align: center;">NOTICE OF SALE OF ESTATE PROPERTY</p>
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Sale Date: March 7, 2023 (tentative)	Time: 10:00 a.m. (tentative)
Location: On site viewing March 6, 2023 from 10:00 a.m.-4:00 p.m.; viewing site: 2304 S. Castle Harbour Pl., Ontario, California	

Type of Sale: Public Private **Last date to file objections:** February 7, 2023

Description of property to be sold: wood working equipment and tools used in the operations of the Debtor's manufacturing business including forklift, 2014 Freightliner Model #M2-106 and office furniture, computers and printer.
See attached for more information.

Terms and conditions of sale: See attached Statement of Information in Compliance with LBR 6004-1(c)(3).

Proposed sale price: to be determined - online public auction sale

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): Online public auction sale. See attached Statement of Information and Auction Motion

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

2/21/2023 at 11:00 a.m.

United States Bankruptcy Court

Courtroom 303

3420 Twelfth Street

Riverside, CA 92501

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

Lynda T. Bui

Shulman Bastian Friedman & Bui LLP

100 Spectrum Center Drive, Suite 600

Irvine, CA 92618

Telephone: (949) 340-3400

Facsimile: (949) 340-3000

Date: 01/31/2023

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Leonard M. Shulman – Bar No. 126349 Lynda T. Bui – Bar No. 201002 SHULMAN BASTIAN FRIEDMAN & BUI LLP 100 Spectrum Center Drive, Suite 600 Irvine, California 92618 Telephone: (949) 340-3400 Facsimile: (949) 340-3000 Email: LShulman@shulmanbastian.com; LBui@shulmanbastian.com <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Charles W. Daff, Chapter 7 Trustee	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION	
In re: INTERIOR SOLUTIONS, INC., Debtor(s).	CASE NO.: 6:22-bk-14774-RB CHAPTER: 7 NOTICE OF MOTION FOR: AN ORDER: (1) AUTHORIZING THE TRUSTEE TO CONDUCT AN AUCTION SALE OF PERSONAL PROPERTY ASSETS OF THE ESTATE FREE AND CLEAR OF LIENS PURSUANT TO BANKRUPTCY CODE SECTIONS 363(b) and (f); (2) APPROVING PAYMENT OF COMPENSATION AND EXPENSES TO THE AUCTIONEER; AND (3) GRANTING RELATED RELIEF INCLUDING USE OF SALE PROCEEDS TO PAY ACTUAL COSTS INCURRED (Specify name of Motion) DATE: 02/21/2023 TIME: 11:00 am COURTROOM: 303 PLACE: 3420 Twelfth Street Riverside, CA 92501

1. TO (*specify name*): THE OFFICE OF THE U.S. TRUSTEE, THE DEBTOR, CREDITORS AND PARTIES IN INTEREST
2. NOTICE IS HEREBY GIVEN that on the following date and time and in the indicated courtroom, Movant in the above-captioned matter will move this court for an Order granting the relief sought as set forth in the Motion and accompanying supporting documents served and filed herewith. Said Motion is based upon the grounds set forth in the attached Motion and accompanying documents.
3. **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.)

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

4. **Deadline for Opposition Papers:** This Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the court and serve a copy of it upon the Movant or Movant's attorney 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 this 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.
5. **Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure:** The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures.

Date: 01/31/2023

SHULMAN BASTIAN FRIEDMAN & BUI LLP
Printed name of law firm

/s/ Lynda T. Bui
Signature

Lynda T. Bui
Printed name of attorney

Statement of Information in Compliance with LBR 6004-1(c)(3)

<u>LBR 6004-1(c)(3) Requirement</u>	<u>Information</u>
<p><i>LBR 6004-1(c)(3)(A)</i> Date, Time, and Place of hearing on the proposed sale:</p>	<p>Hearing Date and Time for the Auction Motion: Date: February 21, 2013 at 11:00 a.m. Hearing Place: U.S. Bankruptcy Court Courtroom 303 3420 Twelfth Street Riverside, CA 92501</p>
<p><i>LBR 6004-1(c)(3)(B)</i> Name and address of the proposed buyer:</p>	<p>To be determined – online public auction sale. A Report of Auctioneer will be filed with the Court following conclusion of the auction which will identify the date of the sale, each item sold, the sale price and the name, address, and telephone number of the purchaser - in the case of lots, a brief description of each lot sold as well as the sale price and purchaser - the gross proceeds of sale, a statement that the gross proceeds have been turned over to the Trustee, and a descriptive list of the items that were not sold but which were returned to the Trustee.</p>
<p><i>LBR 6004-1(c)(3)(C)</i> Description of the property to be sold:</p>	<p>The personal property assets to be included in the proposed auction are generally described as wood working equipment and tools used in the operations of the Debtor’s manufacturing business including forklift, 2014 Freightliner Model #M2-106 (“Truck”) and office furniture, computers and printer (collectively the “Assets”).</p>
<p><i>LBR 6004-1(c)(3)(D)</i> Terms and conditions of the proposed sale, including the price and all contingencies:</p>	<ul style="list-style-type: none"> • The Trustee proposes to liquidate the Assets by online auction to the highest bidder. The online auction will be scheduled to commence approximately ten (10) days after the Court has approved the Auction Motion. The online auction is tentatively scheduled for March 7, 2023 at 10:00 a.m. with a preview/inspection of the Assets by prospective buyers to take place at the Debtor’s business premises located at 2304 S. Castle Harbour Place, Ontario, California. • 10% Buyer’s Premium charged to each purchaser; an additional 2% charged to each purchaser and paid to Proxibid for online bidding services; and an additional 3% will be charged to each purchaser who pays with a credit card. • The sale will be without limit and without reserve, subject only to minimum opening bid amounts established by the Auctioneer, based on Auctioneer’s expert judgment. • Auctioneer will offer the Assets to buyers in “as-is, where-is” condition, without representations or warranties. • If necessary, the Auctioneer may require bidders to post an appropriate deposit as a prerequisite to bid. • The Auctioneer will require buyers to sign a terms sheet, which will include terms to protect Auctioneer and Seller from buyer payment defaults, damage to persons or property onsite, claims regarding the Assets, etc. • Auctioneer will accept from buyers the following forms of payment: cash, credit card (a 3% fee will be charged to all buyers), cashiers’ checks, guaranteed checks and wire transfer as payment for the property sold. • Auctioneer shall be responsible to collect and remit any applicable sales tax.

<u>LBR 6004-1(c)(3) Requirement</u>	<u>Information</u>
<p><i>LBR 6004-1(c)(3)(E)</i> Whether the proposed sale is free and clear of liens, claims or interests, or subject to them, and a description of all such liens, claims or interests:</p>	<p>The sale will be free and clear of liens pursuant to Bankruptcy Code §363(b)(1) and (f). The Truck is estimated to have a value of \$40,000.00 and the lien in favor of Toyota is approximately \$18,000.00. The Trustee believes that other than the lien on the Truck, there are no other perfected valid liens or encumbrances impacting the Assets. Nevertheless, out of an abundance of caution, the Trustee seeks authority to conduct the auction sale free and clear of all liens and encumbrances, with any liens and interests against the Assets that are not released, paid in full, or otherwise resolved through the sale, if any, to attach to the sale proceeds with the same force, effect, validity, and priority as such liens or interests had with respect to the Assets prior to the sale, pending agreement with the lienholder or further Court order.</p>
<p><i>LBR 6004-1(c)(3)(F)</i> Whether the proposed sale is subject to higher and better bids:</p>	<p>The Trustee proposes to liquidate the Assets by online auction to the highest bidder.</p>
<p><i>LBR 6004-1(c)(3)(G)</i> Consideration to be received by the Estate, including estimated commissions, fees and other costs of sale:</p>	<p>The Trustee proposes to liquidate the Assets by auction to the highest bidder. The Trustee proposes to employ Fischer Auction Co., Inc. as the auctioneer ("<u>Auctioneer</u>").</p> <p>10% Buyer's Premium charged to each purchaser, an additional 2% charged to each purchaser and paid to Proxibid for online bidding services, and an additional 3% will be charged to each purchaser who pays with a credit card. The Buyer's Premium will be collected by the Auctioneer and along with the auction proceeds turned over to the Trustee no later than seven calendar days after the conclusion of the auction. Payment of the Buyer's Premium by the Estate to the Auctioneer is subject to the Auctioneer providing the Trustee a with Report of Auctioneer within twenty-one (21) days after the conclusion of the auction in compliance with the requirements of the United States Trustee's Supervisory Instruction No. 10.</p> <p>Auctioneer will be reimbursed its reasonable costs for advertising, labor, permits, etc. in conducting the auction. Such costs are estimated to be no more than \$9,000.00 for labor and advertising. If the Auctioneer has to advance funds to pay Toyota to expedite the sale and closing of the Truck, the Auctioneer will be requesting a payoff expenses not to exceed \$18,000.00</p>
<p><i>LBR 6004-1(c)(3)(H)</i> If authorization if sought to pay commission, the identity of the auctioneer, broker, or sales agent and the amount or percentage of the proposed commission to be paid:</p>	<p>See above.</p>
<p><i>LBR 6004-1(c)(3)(I)</i> A description of the estimated or possible tax consequences to the Estate, if known, and how any tax liability generated by the sale of the property will be paid:</p>	<p>Auctioneer shall be responsible to collect and remit any applicable sales tax.</p>
<p><i>LBR 6004-1(c)(3)(J)</i> Date which objection must be filed and served:</p>	<p>Objections, if any, must be filed and served 14 days prior to the Hearing Date (or by February 7, 2023).</p>

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6 Proposed Attorneys for Charles W. Daff,
Chapter 7 Trustee
7

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, RIVERSIDE DIVISION**

10
11 In re

12 **INTERIOR SOLUTIONS, INC.,**

13 Debtor.

Case No. 6:22-bk-14774-RB

Chapter 7

**CHAPTER 7 TRUSTEE’S MOTION FOR AN
ORDER:**

14
15 **(1) AUTHORIZING THE TRUSTEE TO
CONDUCT AN AUCTION SALE OF
PERSONAL PROPERTY ASSETS OF THE
ESTATE FREE AND CLEAR OF LIENS
PURSUANT TO BANKRUPTCY CODE
SECTIONS 363(b) AND (f);**

16
17
18 **(2) APPROVING PAYMENT OF
COMPENSATION AND EXPENSES TO THE
AUCTIONEER; AND**

19
20 **(3) GRANTING RELATED RELIEF
INCLUDING USE OF SALE PROCEEDS TO
PAY ACTUAL COSTS INCURRED;**

21
22 **MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
CHARLES W. DAFF IN SUPPORT**

23 **Hearing:**

24 Date: February 21, 2023

25 Time: 11:00 a.m.

26 Place: Courtroom 303

United States Bankruptcy Court

3420 Twelfth Street

Riverside, CA 92501

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1 TO THE HONORABLE MAGDALENA REYES BORDEAUX, UNITED STATES
2 BANKRUPTCY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, THE
3 DEBTOR, CREDITORS AND PARTIES-IN-INTEREST:

4 I. INTRODUCTION

5 Charles W. Daff ("Trustee"), the Chapter 7 trustee for the bankruptcy estate ("Estate") of
6 Interior Solutions, Inc. ("Debtor"), brings this *Motion for an Order*: (1) *Authorizing the Trustee to*
7 *Conduct an Auction Sale of Personal Property Assets of the Estate Free and Clear of Liens Pursuant*
8 *to Bankruptcy Code Sections 363(b) and (f); (2) Approving Payment of Compensation and Expenses*
9 *to the Auctioneer; and (3) Granting Related Relief Including Use of Sale Proceeds to Pay for Actual*
10 *Costs Incurred* ("Auction Motion").

11 The Trustee has determined that the sale of the Debtor's Assets¹ through an online auction
12 will provide the most benefit for the Estate and its creditors. In addition, the Assets are located on
13 the Business Premises under the Lease that currently provides for rental payments of \$11,522.64
14 per month.² The Trustee needs to immediately liquidate the Assets, vacate the Business Premises
15 and return the Business Premises to the Landlord.

16 The Trustee is advised by the proposed Auctioneer that the Assets to be sold at auction have
17 a gross liquidation value of approximately \$93,750.00 and after payment of costs of the sale, the net
18 proceeds for the Estate are anticipated to exceed approximately \$54,000.00. Based on good business
19 reasons that exist as outlined below, the Trustee respectfully requests that the Court approve the
20 Auction Motion.

21 ///

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24 _____
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26 ¹ Capitalized terms are defined below.

27 ² The Debtor's Landlord has filed a Motion for Relief From Stay seeking to take possession of the Business Premises.
28 A hearing on the Motion is currently scheduled for February 23, 2023 at 11:00 a.m. The Trustee intends to reach out to the Debtor's Landlord to reach an agreement regarding the storing of the Assets at the Business Premises until completion of the auction and with respect to the Assets remaining in the Business Premises after the online auction sale.

1 **II. RELEVANT FACTS**

2 **A. The Bankruptcy Case**

3 The Debtor filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code
4 on December 22, 2022 (“Petition Date”). A true and correct copy of the Debtor’s Schedule A/B filed
5 on December 22, 2022 (docket number 1) is attached as **Exhibit “1”** to the Declaration of Charles
6 W. Daff (“Daff Declaration”).

7 The Debtor’s Schedules indicate \$277,140.25 in secured claims, \$0.00 in priority claims and
8 general unsecured claims of \$327,768.23. The deadline for filing proofs of claim is May 1, 2023
9 for unsecured creditors and June 20, 2023 for governmental entities.

10 The Debtor manufactures and assembles cabinets, other interior products for ancillary office
11 and other legal and allied uses for hotels and other commercial businesses.

12 On its Schedule D, the Debtor lists a lien in favor of Chino Commercial Bank (the “Bank”)
13 in the amount of \$277,140.25 and values the collateral at \$0.00. Based on the Trustee’s review of
14 the UCC-1 Financing Statement filed with the Office of the Secretary of State, State of California,
15 by the Bank on February 9, 2018, while there is reference to collateral an Exhibit “A” attached
16 thereto, there is no Exhibit “A” attached to the UCC-Financing Statement. In other words, the UCC-
17 1 did not have the description of the collateral. As a result, the Trustee believes that any alleged lien
18 asserted by the Bank against any of the Assets is not properly perfected.

19 Additionally, the Trustee is informed that on December 1, 2022, Toyota Industries
20 Commercial Finance, Inc. (“Toyota”) filed a UCC-1 Financing Statement with the Office of the
21 Secretary of State, State of California, asserting a security interest in a 2014 Freightliner Model
22 #M2-106 (“Truck”). The Trustee has obtained a payoff from Toyota for \$17,476.52 and believes
23 that Toyota will consent to the sale of the Truck through the online auction sale.

24 The personal property assets to be included in the online auction sale are located at the
25 Debtor’s business premises located at 2304 S. Castle Harbour Place, Ontario, California (“Business
26 Premises”) leased by the Debtor prior to the Petition Date under a Standard Industrial/Commercial
27 Single-Tenant Lease – Gross (“Lease”) with the Debtor’s landlord, Deaguiar Family Trust
28 (“Landlord”) that currently provides for rental payments of \$11,522.64 per month. The Trustee

1 needs to liquidate the personal property in order to return the Business Premises and pay any
2 outstanding rent that may be due under the Lease as negotiated between the Trustee and the Landlord
3 and approved by the Court.

4 **B. The Assets to be Sold at Auction**

5 The personal property assets to be included in the proposed online auction sale are generally
6 described as (i) wood working equipment and tools with a total value of \$102,740.00; (ii) office
7 furniture, computers and printer with a total value of \$4,600.00; and (iii) the Truck valued at
8 \$40,000.00 (collectively, the “Assets”). The proposed Auctioneer has inspected the Assets and has
9 advised that they have a total estimated gross liquidation value of approximately \$93,750.00.
10 Through the competitive bidding of a public online auction sale, it is anticipated that the Trustee
11 will receive the best and highest value for the Assets and therefore, the ultimate sale price of the
12 Assets will be fair and reasonable.

13 Other than the lien asserted by Toyota against the Truck, the Trustee believes that there are
14 no other liens or encumbrances impacting the Assets. Nevertheless, out of an abundance of caution,
15 the Trustee seeks authority to conduct the auction sale free and clear of all liens and encumbrances,
16 with any liens and interests against the Assets that are not released, paid in full, or otherwise resolved
17 through the sale, if any, to attach to the sale proceeds with the same force, effect, validity, and
18 priority as such liens or interests had with respect to the Assets prior to the sale, pending agreement
19 with the lienholder or further Court order.

20 **C. The Proposed Auction Date, Proposed Auctioneer and Auction Contract**

21 The Trustee proposes to liquidate the Assets by online auction to the highest bidder. The
22 online auction will be scheduled to commence approximately ten (10) days after the Court has
23 approved the Auction Motion. The online auction is tentatively scheduled for March 7, 2023 at
24 10:00 a.m. with a preview/inspection of the Assets by prospective buyers to take place at the
25 Business Premises on March 6, 2023 from 10:00 a.m. to 4:00 p.m.

26 Concurrent with the filing of this Auction Motion, the Trustee has filed his *Application for*
27 *an Order Authorizing the Trustee to Employ Fischer Auction Co. Inc. as Auctioneer* for the
28

1 auctioneer to coordinate the online auction pursuant to the terms of the Auction Contract, a true and
2 correct copy of which is attached as **Exhibit “2”** to the Daff Declaration.

3 The Auctioneer has a blanket bond in the amount of \$250,000.00 made payable to the United
4 States of America, which is on file with the Bankruptcy Court. Attached as **Exhibit “3”** to the Daff
5 Declaration is copy of the blanket bond. The total amount of assets the Auctioneer is currently
6 holding for auction does not total more than \$250,000.00.

7 The Auctioneer has advised the Trustee that it maintains liability insurance for lost or stolen
8 property which protects any and all property under the Auctioneer’s control which is secured,
9 transported and stored at the Auctioneer’s auction location until sold.

10 The principal terms of the Auction Contract and proposed auction sale are as follows:

11 Sale Format	Public online auction to be accessed via 12 http://fischerauctions.proxibid.com
13 Sale Date and Time	The online auction will be scheduled to commence approximately ten 14 (10) days after the Court has approved the Auction Motion. The online auction is tentatively scheduled for March 7, 2023 at 10:00 a.m.
15 Viewing Site	Interested parties may preview/inspect the Assets at the Business 16 Premises on March 6, 2023 from 10:00 a.m. to 4:00 p.m.
17 Assets	Wood working equipment, tools, the Truck, forklift, office furniture, computers and printer equipment used in the Debtor’s former business.
18 Marketing	Newspaper, online publications, direct mail and email blast. 19 Advertising to commence no later than two weeks prior to the auction sale date. Advertising to be targeted to the demographic area of the 20 Debtor’s industry so as to fully expose the auction sale.
21 Auctioneer’s Costs	Auctioneer will be reimbursed its reasonable costs for advertising, labor, 22 permits, etc. in conducting the auction. Such costs are estimated to be no more than \$9,000.00 for labor and advertising. If the Auctioneer has 23 to advance funds to pay Toyota to expedite the sale and closing of the Truck, the Auctioneer will be requesting a payoff expenses not to exceed \$18,000.00.

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<p>Auctioneer's Compensation</p>	<p>The Auctioneer will conduct the auction sale based solely upon the following compensation: (i) commission to be 10% of the gross proceeds, except for the Truck, which will be at 5%.</p> <p>As is standard in the industry, there will be a 10% Buyer's Premium charged to each purchaser, an additional 2% charged to each purchaser and paid to Proxibid for online bidding services, and an additional 3% will be charged to each purchaser who pays with a credit card. The Firm has no ownership interest in Proxibid and all Assets will be sold through Proxibid.</p> <p>The Buyer's Premium will be collected by the Auctioneer and along with the auction proceeds turned over to the Trustee no later than seven calendar days after the conclusion of the auction. Payment of the Buyer's Premium by the Estate to the Auctioneer is subject to the Auctioneer providing the Trustee with a Report of Auctioneer ("Auction Report") within twenty-one (21) days after the conclusion of the auction in compliance with the requirements of the United States Trustee's Supervisory Instruction No. 10.³</p> <p>Within seven days of the Trustee's receipt of the Auction Report, the Trustee shall file it with the Court along with a declaration stating that the Trustee has compared the Auction Report to the list of items/lots sold, the Auction Report is satisfactory, the gross funds have been turned over to the Trustee, and the Auctioneer has been compensated pursuant to the terms of the Auction Contract and the Auction Motion as approved by the Court. Provided an Order has been entered approving payment of the Auctioneer's compensation and expenses, the Trustee shall compensate the Auctioneer for the Court approved fees and expenses within seven calendar days of the Trustee's receipt of the Auction Report.</p>
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³ The Auction Report must include at a minimum: the date of the sale, each item sold, the sale price and the name, address, and telephone number of the purchaser - in the case of lots, a brief description of each lot sold as well as the sale price and purchaser thereof, the gross proceeds of sale, a statement that the gross proceeds have been turned over to the Trustee, and a descriptive list of the items that were not sold but which were returned to the Trustee. The Supervisory Instruction No. 10 also provides that any and all auction proceeds are to be turned over to the Trustee within seven days of conclusion of the auction and that the Auction Report is due within twenty-one days after conclusion of the auction.

1 2 3 4 5 6 7 8 9	<p>Additional terms</p> <ul style="list-style-type: none">• The sale will be without limit and without reserve, subject only to minimum opening bid amounts established by the Auctioneer, based on Auctioneer's expert judgment.• Auctioneer will offer the Assets to buyers in "as-is, where-is" condition, without representations or warranties.• If necessary, the Auctioneer may require bidders to post an appropriate deposit as a prerequisite to bid.• The Auctioneer will require buyers to sign a terms sheet, which will include terms to protect Auctioneer and Seller from buyer payment defaults, damage to persons or property onsite, claims regarding the Assets, etc.• Auctioneer will accept from buyers the following forms of payment: cash, credit card (a 3% fee will be charged to all buyers), cashiers' checks, guaranteed checks and wire transfer as payment for the property sold.• Auctioneer shall be responsible to collect and remit any applicable sales tax.
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11 **D. Tax Consequences**

12 Any sales taxes from the sale of the Assets will be paid by the purchaser of the Assets at the
13 auction. At this time, the Trustee does not know what the capital gains taxes liability will be, if any,
14 generated by the sale. In the event that there is any tax liability generated from the sale, it is
15 anticipated that such taxes will be paid from the sale proceeds.

16 **E. Request for Authorization to Use the Auction Proceeds to Pay the Auctioneer's**
17 **Compensation and Expenses and to Reimburse the Trustee for his Actual Costs**

18 Through this Auction Motion, the Trustee requests the Court authorize the use of the
19 proceeds of the auction sale to make Court approved disbursements to the proposed Auctioneer
20 pursuant to the terms of the Auction Contract and this Auction Motion as described above.

21 **F. Request to Authorize the Trustee to execute Documents to Transfer Title Assets**
22 **Included in the Auction Sale**

23 Through this Auction Motion, the Trustee seeks authority to execute the appropriate
24 documents to facilitate the transfer of title to the Truck or other assets that are included in the auction
25 sale.

26 **G. Rejection of the Lease for the Debtor's Business Premises**

27 The Lease with the Landlord provides that rent due the Landlord is \$11,522.64 per month.
28 The proposed online auction sale will be conducted approximately ten (10) days after the Court has

1 approved the Auction Motion and is tentatively scheduled for March 7, 2023 at 10:00 a.m. The
2 Trustee requests authorization to terminate and reject the Lease effective as of March 15, 2023 and
3 directing that any proofs of claim arising from the termination and rejection of the Lease must be
4 filed with the Court by no later than May 1, 2023 (the same deadline set by the Court for creditors
5 to file their proofs of claim).

6 Once the auction sale has concluded, the Lease will have no benefit for the Estate and
7 creditors. As such, the Trustee has determined that it is in the best interest of the Estate and creditors
8 that the Trustee terminate and reject the Lease so that the Estate's liability can be released and the
9 accrual of administrative expenses can be stopped. Entry of an order authorizing the Trustee to
10 terminate and reject the Lease will assist Trustee in the reduction of administrative costs.

11 III. LEGAL AUTHORITIES

12 A. There are Good Business Reasons for the Sale and the Sale is in the Best Interest of the 13 Estate.

14 The duties of a trustee in a Chapter 7 filing are enumerated in 11 U.S.C. §704, which
15 provides in relevant part as follows:

16 (a) The trustee shall—

17 (1) collect and reduce to money the property of the estate for which
18 such trustee serves, and close such estate as expeditiously as is
compatible with the best interests of parties in interest;

19 (2) be accountable for all property received;

20 11 U.S.C. §704(a).

21 Further, the Trustee, after notice and hearing, may sell property of the estate. 11 U.S.C. §
22 363(b). Courts ordinarily will approve a proposed sale if there is a good business reason for the sale
23 and the sale is in the best interests of the estate. *In re Wilde Horse Enterprises, Inc.*, 136 B.R. 830,
24 841 (Bankr. C.D. Cal. 1991); *In re Lionel Corp.*, 722 F.2d 1063, 1069 (2d Cir. 1983).

25 The Trustee has made a business decision and believes that the sale of the Assets by the
26 proposed auction sale is the best available alternative for maximizing the value of the Assets for the
27 Estate and creditors. The auction sale is the most efficient and cost effective way to liquidate the
28 Assets and will allow the Estate to receive the most value as compared to attempting to sell on a

1 piecemeal basis. The Trustee has been advised by the proposed Auctioneer that the auction may
2 generate net funds (after costs of sale) of between \$54,000.00 and \$57,375.00 as follows:

3	Estimated Gross Sale Projection	\$90,000.00	\$93,750.00
4	Less payoff to Toyota (estimate)	(\$18,000.00)	(\$18,000.00)
5	Less Auctioneer expense reimbursement (estimate)	(\$9,000.00)	(\$9,000.00)
6	Less 10% commission charged to Estate (this amount will be less because the Auctioneer has agreed to charge 5% commission for the sale of the Truck)	(\$9,000.00)	(\$9,375.00)
7			
8			
9	Estimated Net Recovery	\$54,000.00	\$57,375.00
10			

11 Through the competitive bidding of an online public auction, it is anticipated that the Trustee
12 will receive the best and highest value for the Assets and therefore, the ultimate sale price will be
13 fair and reasonable. In addition, the Assets are located on the Business Premises that is accruing
14 rent of \$11,522.64. The Trustee is in the process of discussing providing the landlord an
15 administrative claim for the storage of the Assets until the conclusion of the Auction and turning
16 over possession. The Trustee needs to liquidate the Assets as quickly as possible in order to return
17 the Business Premises to the Landlord and stop the accrual of administrative rent charges that would
18 be detrimental to general unsecured creditors. Thus, based on good business reasons, approval of
19 this Auction Motion would serve the best interests of the Estate and its creditors.

20 Therefore, the Trustee respectfully submits that, if this Court applies the good business
21 reason standard suggested by the Second Circuit in *Lionel*, the sale should be approved.

22 **B. The Proposed Sale Should be Allowed Free and Clear of Liens**

23 Bankruptcy Code Section 363(f) allows a trustee to sell property of the bankruptcy estate
24 “free and clear of any interest in such property of an entity,” if any one of the following five
25 conditions is met:

- 26 (1) applicable non-bankruptcy law permits a sale of such
27 property free and clear of such interest;
28 (2) such entity consents;

1 (3) such interest is a lien and the price at which such
2 property is to be sold is greater than the aggregate value of all liens
on such property;

3 (4) such interest is in bona fide dispute; or

4 (5) such entity could be compelled, in a legal or equitable
5 proceeding, to accept money satisfaction of such interest.

6 11 U.S.C. § 363(f).

7 Section 363(f) is written in the disjunctive and thus only one of the enumerated conditions
8 needs to be satisfied for Court approval to be appropriate. The Trustee proposes to sell under
9 sections 363(f)(2), (3) and (4).

10 **1. Section 363(f)(3) – Sale Price Exceeds Aggregate Value of All Liens**
11 **Encumbering the Assets**

12 Section 363(f)(3) of the Bankruptcy Code provides that the trustee may sell property of the
13 estate free and clear of any lien on such property if the price at which such property is to be sold is
14 greater than the aggregate value of all liens on such property. 11 U.S.C. § 363(f)(3). The Truck is
15 estimated to have a value of \$40,000.00 and the lien in favor of Toyota is approximately \$18,000.00.
16 Given that the Trustee does not believe that the Bank’s claim is secured,⁴ any sale proceeds received
17 from the Auction will exceed the value of the Bank’s “lien”.

18 Accordingly, the Trustee intends to sell the Assets free and clear of any security interests
19 pursuant to subsection (f)(3) as the sale price will be greater than the value of any liens encumbering
20 them.

21 **2. Section 363(f)(4) – Bona Fide Dispute**

22 Alternatively, the Trustee intends to sell the Assets under subsection (f)(4). A bona fide
23 dispute has been defined by *In re Atwood*, 124 B.R. 402 (Bankr. S.D. Ga. 1991) as a “genuine issue
24 of material fact that bears upon the debtor’s liability, or meritorious contention as to the application
25 of law to undisputed facts.” *Id.* at 407. In *In re Milford Group, Inc.*, 150 B.R. 904 (Bankr. M.D.
26 Pa. 1992), the court stated it need not resolve a bona fide dispute, but must determine whether the
27

28 _____
⁴ See bona fide dispute discussion below.

1 issues presented are genuine as to the existence of a bona fide dispute. In doing so, the *Milford*
2 Court found that the debtor had met its burden to establish cause for the Court to allow for the sale
3 of the property, free and clear of liens. Requiring resolution of those issues before the sale may
4 likely take substantial time, effort and expense by the parties.

5 Here, the Trustee believes that other than the lien on the Truck, there are no other perfected
6 valid liens or encumbrances impacting the Assets. While the Bank recorded a UCC-1, the document
7 recorded is missing Exhibit A. That is, the UCC-1 did not indicate the collateral covered by the
8 financing statement, thereby failing to comply with California Uniform Commercial Code section
9 502(a). *See Cal. Com. Code § 9502 (Deering, Lexis Advance through the 2022 Regular Session)*.
10 A UCC financing statement that refers to an unfiled document for the collateral description is
11 inadequate. *See Altair Global Credit Opportunities Fund (A), LLC v. P.R. AAA Portfolio Bond Fund,*
12 *Inc. (In re Fin. Oversight & Mgmt. Bd.)*, 914 F.3d 694 (1st Cir. 2019) cert. denied, ___ U.S. ___,
13 140 S. Ct. 47, 205 L. Ed. 2d 29 (financing statement that described collateral through cross reference
14 to unattached security agreement without instruction as to how to obtain a copy was insufficient).
15 The Trustee will be able to successfully challenge the Bank's secured (perfected) status under the
16 strong-arm provisions of Bankruptcy Code section 544(a).

17 Nevertheless, out of an abundance of caution, the Trustee seeks authority to conduct the
18 auction sale free and clear of all liens and encumbrances, with any liens and interests against the
19 Assets that are not released, paid in full, or otherwise resolved through the sale, if any, to attach to
20 the sale proceeds with the same force, effect, validity, and priority as such liens or interests had with
21 respect to the Assets prior to the sale, pending agreement with the lienholder or further Court order.
22 The need to resolve disputed liens should not hinder, delay or in any way inhibit the Trustee's efforts
23 to maximize the value of the sale of the Assets for the Estate. Unresolved liens will be the subject
24 of a bona fide dispute as the Trustee believes there are no liens impacting the Assets. Pursuant to
25 Bankruptcy Code §§ 363(b)(1) and 363(f)(4), the Trustee seeks to sell the Assets free and clear of
26 unresolved liens with such disputed liens to attach to the proceeds of the sale in the same validity
27 and priority as prior to the sale pending agreement with the lienholder or further Court order. Thus,
28

1 approval for the sale free and clear of the lien as a disputed lien pursuant to Bankruptcy Code §§
2 363(f)(3) and (4) is appropriate.

3 **C. Subject to Court Approval, the Trustee May Reject Any Executory Contract or**
4 **Unexpired Lease of the Estate**

5 Bankruptcy Code Section 365(a) provides, in relevant part:

6 . . . the trustee, subject to the court’s approval, may assume or reject
7 any executory contract or unexpired lease of the debtor.

8 Business judgment dictates that leases should be terminated and rejected if they have no
9 significant benefit for the Estate and its creditors. The Lease has no benefit to the Estate after the
10 Auction, and the Trustee wishes to terminate and reject the Lease with the Landlord effective as of
11 March 15, 2023. Notwithstanding, the Trustee is working with the Landlord on the administrative
12 claim and turning over possession of the Business Premise.

13 **D. The Court has Authority to Waive the Fourteen-Day Stay of Sale**

14 Federal Rule of Bankruptcy Procedure 6004(h) provides that “[a]n order authorizing the use,
15 sale or lease of property other than cash collateral is stayed until the expiration of 14 days after entry
16 of the order, unless the Court orders otherwise.” Fed. Rule Bankr. P. 6004(h). The Trustee desires
17 to conduct and close the auction sale as soon as practicable after entry of an order approving the
18 Auction Motion. Accordingly, the Trustee requests that the Court, in the discretion provided it
19 under Federal Rule of Bankruptcy Procedure 6004(h), waive the fourteen-day stay requirement.

20 **IV. CONCLUSION**

21 Based upon the foregoing, the Trustee respectfully submits that good cause exists for
22 granting the Auction Motion and requests that the Court enter an order as follows:

23 1. Approving the online auction sale of the Assets, to the highest bidder, free and clear
24 of all liens and encumbrances with any liens and interests against the Assets that are not released,
25 paid in full, or otherwise resolved through sale, if any, to attach to the sale proceeds with the same
26 force, effect, validity, and priority as such liens or interests had with respect to the Assets prior to
27 the sale, pending agreement with the lienholder or further Court order.

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1 2. Authorizing the Trustee to execute the appropriate documents to facilitate the
2 transfer of title to any vehicles or other assets that are included in the auction sale.

3 3. Approving and authorizing payment of the Auctioneer’s compensation and expenses
4 pursuant to the terms of the Auction Contract and this Auction Motion.

5 4. Authorizing the Trustee to use the proceeds of the auction sale to make Court
6 approved disbursements to the proposed Auctioneer pursuant to the terms of the Auction Contract
7 and this Auction Motion.

8 5. Authorizing payment to the Auctioneer without further order of this Court upon
9 completion of the requirements of the United States Trustee’s Supervisory Instructions No. 10.

10 6. As to the Truck subject to the interest of Toyota, provided that Toyota consents to
11 the sale and there is equity for the Estate, authorizing the Trustee (either directly or through the
12 Auctioneer) to sell such the Truck free and clear of Toyota’s interest.

13 7. Authorizing the Trustee to terminate and reject the real property lease for Debtor’s
14 business premises located at 2304 S. Castle Harbour Place, Ontario, California, effective as of
15 March 15, 2023 and directing that any proofs of claim arising from the termination and rejection of
16 the Lease must be filed with the Court by no later than May 1, 2023.

17 8. Directing that the fourteen day stay of the order approving the Auction Motion as
18 provided by Federal Rules of Bankruptcy Procedure 6004(h), or any other applicable rules, shall not
19 apply and that absent judicial imposition of a stay of the Court order approving the Auction Motion
20 pending appeal, the Trustee may immediately consummate the actions that are approved by such
21 Court order.

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1 9. For such other and further relief as the Court deems just and proper under the
2 circumstances of this case.

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Dated: January 31, 2023

Respectfully submitted,

SHULMAN BASTIAN FRIEDMAN & BUI LLP

/s/ Lynda T. Bui

Leonard M. Shulman
Lynda T. Bui
Proposed Attorneys for Charles W. Daff, Chapter 7 Trustee
for the bankruptcy estate of Interior Solutions, Inc.

DECLARATION OF CHARLES W. DAFF

I, Charles W. Daff, declare:

1. I am the Chapter 7 trustee for the bankruptcy estate of *In re Interior Solutions, Inc.* (“Debtor”), Case No. 6:22-bk-14774-RB. I have personal knowledge of the matters set forth in this Declaration and if called upon to testify, I could and would testify competently to the matters.

2. I am familiar with the Debtor’s bankruptcy proceeding and make this Declaration in support of my *Motion for an Order Authorizing the Trustee to: (1) Conduct an Auction Sale of Personal Property Assets of the Estate Free and Clear of Liens Pursuant to Bankruptcy Code Sections 363(b) and (f); (2) Approving Payment of Compensation and Expenses to the Auctioneer; and (3) Granting Related Relief Including Use of Sale Proceeds to Pay for Actual Costs Incurred* (“Auction Motion”). Unless otherwise noted, capitalized terms herein have the meaning as set forth in the Auction Motion.

3. Except as otherwise indicated, all statements in this Declaration are based on my personal knowledge, my review of relevant documents in the Debtor’s bankruptcy case, or my opinion based upon my experience and knowledge as a panel trustee for the Central District of California. If called as a witness, I could and would competently testify thereto.

4. I have read and I am aware of the contents of the Auction Motion and the accompanying Memorandum of Points and Authorities. The facts stated in the Auction Motion and the Points and Authorities are true to the best of my knowledge.

5. The Debtor filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code on December 22, 2022. A true and correct copy of the Debtor’s Schedule A/B filed on December 22, 2022 (docket number 1) is attached here as **Exhibit “1”** and incorporated herein by this reference.

6. I am informed that the Debtor manufactures and assembles cabinets, other interior products for ancillary office and other legal and allied uses for hotels and other commercial businesses.

7. On its Schedule D, the Debtor lists a lien in favor of Chino Commercial Bank (the “Bank”) in the amount of \$277,140.25 and values the collateral at \$0.00. Based on the Trustee’s

1 review of the UCC-1 Financing Statement filed with the Office of the Secretary of State, State of
2 California, by the Bank on February 9, 2018, while there is reference to collateral an Exhibit “A”
3 attached thereto, there is no Exhibit “A” attached to the UCC-Financing Statement. In other words,
4 the UCC-1 did not have the description of the collateral. As a result, I believe that any alleged lien
5 asserted by the Bank against any of the Assets is not properly perfected.

6 8. Additionally, I am informed that on December 1, 2022, Toyota Industries
7 Commercial Finance, Inc. (“Toyota”) filed a UCC-1 Financing Statement with the Office of the
8 Secretary of State, State of California, asserting a security interest in a 2014 Freightliner Model
9 #M2-106 (“Truck”). I have obtained a payoff from Toyota for \$17,476.52 and believe that Toyota
10 will consent to the sale of the Truck through the online auction sale.

11 9. The personal property assets to be included in the online auction sale are located at
12 the Debtor’s business premises located at 2304 S. Castle Harbour Place, Ontario, California
13 (“Business Premises”) leased by the Debtor prior to the Petition Date under a Standard
14 Industrial/Commercial Single-Tenant Lease – Gross (“Lease”) with the Debtor’s landlord, Deaguiar
15 Family Trust (“Landlord”) that currently provides for rental payments of \$11,522.64 per month. I
16 need to liquidate the personal property in order to return the Business Premises and pay any
17 outstanding rent that may be due under the Lease as negotiated with the Landlord and approved by
18 the Court.

19 10. The Debtor’s Landlord has filed a Motion for Relief From Stay seeking to take
20 possession of the Business Premises. A hearing on the Motion is currently scheduled for February
21 23, 2023 at 11:00 a.m. Through my proposed counsel, I intend to reach out to the Debtor’s Landlord
22 to reach an agreement regarding the storing of the Assets at the Business Premises until completion
23 of the auction and with respect to the Assets remaining in the Business Premises after the online
24 auction sale.

25 11. The personal property assets to be included in the proposed online auction sale are
26 generally described as (i) wood working equipment and tools with a total value of \$102,740.00; (ii)
27 office furniture, computers and printer with a total value of \$4,600.00; and (iii) the Truck valued at
28 \$40,000.00 (collectively, the “Assets”). The proposed Auctioneer has inspected the Assets and has

1 advised that they have a total estimated gross liquidation value of approximately \$93,750.00.
2 Through the competitive bidding of a public online auction sale, it is anticipated that the Trustee
3 will receive the best and highest value for the Assets and therefore, the ultimate sale price of the
4 Assets will be fair and reasonable.

5 12. My proposed auctioneer, Fischer Auction Co. Inc. (“Auctioneer”) has inspected the
6 Assets and has advised that they have a total estimated gross liquidation value of approximately
7 \$93,750.00. Through the competitive bidding of an online public auction sale, it is anticipated that
8 the Estate will receive the best and highest value for the Assets and therefore, the ultimate sale price
9 of the Assets will be fair and reasonable.

10 13. Other than the lien of Toyota, I believe that there are no other liens or encumbrances
11 impacting the Assets. Nevertheless, out of an abundance of caution, I seek authority to conduct the
12 auction sale free and clear of all liens and encumbrances, with any liens and interests against the
13 Assets that are not released, paid in full, or otherwise resolved through the sale, if any, to attach to
14 the sale proceeds with the same force, effect, validity, and priority as such liens or interests had with
15 respect to the Assets prior to the sale, pending agreement with the lienholder or further Court order.

16 14. I propose to liquidate the Assets by auction to the highest bidder.

17 15. I request authorization to pay the Auctioneer’s compensation and expenses pursuant
18 to the terms of the Auction Contract, a true and correct copy of which is attached here as **Exhibit**
19 **“2”** and incorporated herein by this reference.

20 16. I am informed that the Auctioneer has a blanket bond in the amount of \$250,000.00
21 made payable to the United States of America, which is on file with the Bankruptcy Court. Attached
22 here as **Exhibit “3”** is copy of the blanket bond. I am further informed that the collective value of
23 all of the Auctioneer’s current assets held for auction is less than \$250,000.00.

24 17. The Buyer’s Premium will be collected by the Auctioneer and along with the auction
25 proceeds, turned over to me no later than seven (7) calendar days after the conclusion of the auction.
26 No later than twenty-one (21) days after the conclusion of the auction, the Auctioneer will submit
27 to me a Report of Auctioneer (“Auction Report”) in compliance with the requirements of the United
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1 States Trustee's Supervisory Instruction No. 10.⁵ Payment of the Buyer's Premium by the Estate
2 to the Auctioneer is subject to the Auctioneer providing me the Auction Report.

3 18. Within seven (7) days of my receipt of the Auction Report, I will file it with the Court
4 along with a declaration stating that I have compared the Auction Report to the list of items/lots
5 sold, the Auction Report is satisfactory, the gross funds have been turned over to me, and the
6 Auctioneer has been compensated pursuant to the terms of the Auction Contract and the Auction
7 Motion as approved by the Court.

8 19. Provided an Order has been entered approving payment of the Auctioneer's
9 compensation and expenses, I will compensate the Auctioneer for the Court approved fees and
10 expenses within seven (7) calendar days of the filing with the Court of the Auction Report and the
11 my declaration.

12 20. I request the Court authorize the use of the proceeds of the auction sale to make Court
13 approved disbursements to the proposed Auctioneer pursuant to the terms of the Auction Contract
14 and the Auction Motion.

15 21. The Lease with the Landlord provides that rent due the Landlord is \$11,522.64 per
16 month. The proposed online auction sale will be scheduled to commence approximately ten (10)
17 days after the Court has approved the Auction Motion. The online auction is tentatively scheduled
18 for March 7, 2023 at 10:00 a.m. with a preview/inspection of the Assets by prospective buyers to
19 take place at the Business Premises on March 6, 2023 from 10:00 a.m. to 4:00 p.m.

20 22. Once the auction sale has concluded, the Lease will have no benefit for the Estate
21 and creditors. As such, I have determined that it is in the best interest of the Estate and creditors
22 that I terminate and reject the Leases so that the Estate's liability can be released and the accrual of
23 administrative expenses can be stopped.

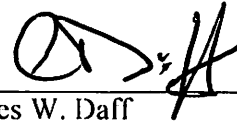
24 23. I request authorization to terminate and reject the Lease with the Landlord effective
25 as of March 15, 2023 and directing that any proofs of claim arising from the termination and
26 _____

27 ⁵ The Auction Report will include at a minimum: the date of the sale, each item sold, the sale price and the name,
28 address, and telephone number of the purchaser - in the case of lots, a brief description of each lot sold as well as the
sale price and purchaser thereof, the gross proceeds of sale, a statement that the gross proceeds have been turned over
to me, and a descriptive list of the items that were not sold but which were returned to me.

1 rejection of the Lease must be filed with the Court by no later than May 1, 2023 (the same deadline
2 set by the Court for creditors to file their proofs of claim). Entry of an order authorizing me to
3 terminate and reject the Lease will assist me in the reduction of administrative costs.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct.

6 Executed on January 30, 2023, at Santa Ana, California.

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Charles W. Daff

Exhibit “1”
Debtor’s Schedule A/B

Fill in this information to identify the case:

Debtor name Interior Solutions, Inc.

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA

Case number (if known) _____

Check if this is an amended filing

Official Form 206A/B

Schedule A/B: Assets - Real and Personal Property

12/15

Disclose all property, real and personal, which the debtor owns or in which the debtor has any other legal, equitable, or future interest. Include all property in which the debtor holds rights and powers exercisable for the debtor's own benefit. Also include assets and properties which have no book value, such as fully depreciated assets or assets that were not capitalized. In Schedule A/B, list any executory contracts or unexpired leases. Also list them on *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G).

Be as complete and accurate as possible. If more space is needed, attach a separate sheet to this form. At the top of any pages added, write the debtor's name and case number (if known). Also identify the form and line number to which the additional information applies. If an additional sheet is attached, include the amounts from the attachment in the total for the pertinent part.

For Part 1 through Part 11, list each asset under the appropriate category or attach separate supporting schedules, such as a fixed asset schedule or depreciation schedule, that gives the details for each asset in a particular category. List each asset only once. In valuing the debtor's interest, do not deduct the value of secured claims. See the instructions to understand the terms used in this form.

Part 1: Cash and cash equivalents

1. Does the debtor have any cash or cash equivalents?

- No. Go to Part 2.
 Yes Fill in the information below.

All cash or cash equivalents owned or controlled by the debtor	Current value of debtor's interest
--	------------------------------------

3.	Checking, savings, money market, or financial brokerage accounts <i>(Identify all)</i>	Last 4 digits of account number	
	Name of institution (bank or brokerage firm)	Type of account	
3.1.	<u>Chino Commercial Bank</u>	<u>Business Checking</u>	<u>7373</u> <u>\$689.95</u>
3.2.	<u>Chino Commercial Bank - payroll account</u>		<u>\$179.27</u>

4. Other cash equivalents *(Identify all)*

5. Total of Part 1. \$869.22

Add lines 2 through 4 (including amounts on any additional sheets). Copy the total to line 80.

Part 2: Deposits and Prepayments

6. Does the debtor have any deposits or prepayments?

- No. Go to Part 3.
 Yes Fill in the information below.

7.	Deposits, including security deposits and utility deposits	
	Description, including name of holder of deposit	
7.1.	<u>Deaguiar Family - rent deposit property: 2304 S. Castle Harbour Place, Ontario, CA 91761</u>	<u>\$6,000.00</u>

8. Prepayments, including prepayments on executory contracts, leases, insurance, taxes, and rent

EXHIBIT "1"

(1) CNC – Morbedelli Author Top 626, (1) Gorbelt material lift for CNC & (1) CNC label printer

(1) Sawstop 10" Industrial Cabinet Saw Model #53230

(1) Selecta 12 – Edgebanding machine

(1) Portable table saw

Production area – (2) compressors with air cooler, (1) added storage tank.

(1) Compressor cnc and (1) cooler

(1) Spray booth

(1) Drill press

(1) Band Saw

(1) Free frame assemble table

(1) Grizzly Dowel machine

(1) Hydro 3200 SCMI sliding table saw

(2) 10" chop saws

(1) SCMI Sandya 1, 36" wide belt sander

(1) CTD Double chop saw

(1) Powermatic Planer

(1) Hinge Boring machine (MAL)

(1) Pocket screw machine (Kreg)

(1) Dust collector for CNC

(3) misc dust collector

(4) Industrial ceiling fans

(6) Industrial floor fans

Flammable storage lockers – (2) large and (2) small

(1) Forklift -Clark GCX25 Serial GX230-0263-9245

**misc small tools not included.*

EXHIBIT "1"

Debtor Interior Solutions, Inc. Case number (If known) _____
 Name

26. Has any of the property listed in Part 5 been appraised by a professional within the last year?
 No
 Yes

Part 6: Farming and fishing-related assets (other than titled motor vehicles and land)

27. Does the debtor own or lease any farming and fishing-related assets (other than titled motor vehicles and land)?

- No. Go to Part 7.
 Yes Fill in the information below.

Part 7: Office furniture, fixtures, and equipment; and collectibles

38. Does the debtor own or lease any office furniture, fixtures, equipment, or collectibles?

- No. Go to Part 8.
 Yes Fill in the information below.

General description	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
39. Office furniture office chairs and desk	\$0.00		\$0.00
40. Office fixtures			
41. Office equipment, including all computer equipment and communication systems equipment and software 6 computers	\$600.00		\$600.00
1 Canon Plotter printer	\$3,116.00		\$4,000.00

42. **Collectibles** Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; china and crystal; stamp, coin, or baseball card collections; other collections, memorabilia, or collectibles

43. **Total of Part 7.** Add lines 39 through 42. Copy the total to line 86. \$4,600.00

44. Is a depreciation schedule available for any of the property listed in Part 7?
 No
 Yes

45. Has any of the property listed in Part 7 been appraised by a professional within the last year?
 No
 Yes

Part 8: Machinery, equipment, and vehicles

46. Does the debtor own or lease any machinery, equipment, or vehicles?

- No. Go to Part 9.
 Yes Fill in the information below.

General description Include year, make, model, and identification numbers (i.e., VIN, HIN, or N-number)	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
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Debtor Interior Solutions, Inc. Case number (If known) _____
Name

47. **Automobiles, vans, trucks, motorcycles, trailers, and titled farm vehicles**

47.1. 2014 Freightliner M2 \$16,950.00 \$40,000.00

48. **Watercraft, trailers, motors, and related accessories** Examples: Boats, trailers, motors, floating homes, personal watercraft, and fishing vessels

49. **Aircraft and accessories**

50. **Other machinery, fixtures, and equipment (excluding farm machinery and equipment)**

51. **Total of Part 8.**

Add lines 47 through 50. Copy the total to line 87.

\$40,000.00

52. **Is a depreciation schedule available for any of the property listed in Part 8?**

- No
 Yes

53. **Has any of the property listed in Part 8 been appraised by a professional within the last year?**

- No
 Yes

Part 9: Real property

54. **Does the debtor own or lease any real property?**

- No. Go to Part 10.
 Yes Fill in the information below.

Part 10: Intangibles and intellectual property

59. **Does the debtor have any interests in intangibles or intellectual property?**

- No. Go to Part 11.
 Yes Fill in the information below.

Part 11: All other assets

70. **Does the debtor own any other assets that have not yet been reported on this form?**

Include all interests in executory contracts and unexpired leases not previously reported on this form.

- No. Go to Part 12.
 Yes Fill in the information below.

Current value of debtor's interest

71. **Notes receivable**

Description (include name of obligor)

72. **Tax refunds and unused net operating losses (NOLs)**

Description (for example, federal, state, local)

73. **Interests in insurance policies or annuities**

74. **Causes of action against third parties (whether or not a lawsuit has been filed)**

75. **Other contingent and unliquidated claims or causes of action of every nature, including counterclaims of the debtor and rights to**

Debtor Interior Solutions, Inc. Case number (if known) _____
Name

set off claims

76. **Trusts, equitable or future interests in property**
77. **Other property of any kind not already listed** *Examples: Season tickets, country club membership*

see attached

\$102,740.00

78. **Total of Part 11.**
Add lines 71 through 77. Copy the total to line 90.

\$102,740.00

79. **Has any of the property listed in Part 11 been appraised by a professional within the last year?**
- No
 Yes

Stock material: as of 12/12/22

3/4 x 4 x 8 white melamine.....	35 sheets
1/2 x 4 x 8 white melamine.....	26 sheets
3/4 x 4 x 8 Black melamine.....	5 sheets
1/2 x 4 x 8 Black melamine.....	22 sheets
3/4 x 5 x 12 mdf.....	12 sheets
3/4 x 5 x 10 mdf.....	5 sheets
3/4 x 4 x 8 mdf.....	48 sheets
3/4 x 4 x 8 water resistance mdf.....	6 sheets
3/4 x 4 x 8 mdf standard.....	6 sheets
1/8 x 4 x 8 mdf.....	12 sheets
1/2 x 4 x 8 acx plywood.....	13 sheets
5/8 x 4 x 8 cdx plywood.....	24 sheets
1/2 x 4 x 8 Baltic Birch Prefinished.....	16 sheet
3/4 x 4 x 8 Poplar ply.....	8 sheet
1/2 x 4 X 8.....	50 sheets
3/4 x 4 x 8 maple ply.....	8 sheets
3/4 x 4 x 8 Oak.....	8 sheets
3/4 x 4 x 8 Misc walnut.....	5 sheets
1/4 x 4 x 8 white oak.....	10 sheets
3/4 x 4 x 8 beech.....	4 sheets

Stock material:

¾ x 4 x 8 white oak.....4 sheets

¾ x 4 x 8 sheet good left over from jobs.....30 sheets

EXHIBIT "1"

Debtor Interior Solutions, Inc. Case number (if known) _____
 Name

Part 12: Summary

In Part 12 copy all of the totals from the earlier parts of the form

Type of property	Current value of personal property	Current value of real property
80. Cash, cash equivalents, and financial assets. <i>Copy line 5, Part 1</i>	<u>\$869.22</u>	
81. Deposits and prepayments. <i>Copy line 9, Part 2.</i>	<u>\$6,000.00</u>	
82. Accounts receivable. <i>Copy line 12, Part 3.</i>	<u>\$118,232.02</u>	
83. Investments. <i>Copy line 17, Part 4.</i>	<u>\$0.00</u>	
84. Inventory. <i>Copy line 23, Part 5.</i>	<u>\$132,796.00</u>	
85. Farming and fishing-related assets. <i>Copy line 33, Part 6.</i>	<u>\$0.00</u>	
86. Office furniture, fixtures, and equipment; and collectibles. <i>Copy line 43, Part 7.</i>	<u>\$4,600.00</u>	
87. Machinery, equipment, and vehicles. <i>Copy line 51, Part 8.</i>	<u>\$40,000.00</u>	
88. Real property. <i>Copy line 56, Part 9.....></i>		<u>\$0.00</u>
89. Intangibles and intellectual property. <i>Copy line 66, Part 10.</i>	<u>\$0.00</u>	
90. All other assets. <i>Copy line 78, Part 11.</i>	+ <u>\$102,740.00</u>	
91. Total. Add lines 80 through 90 for each column	<u>\$405,237.24</u>	+ 91b. <u>\$0.00</u>
92. Total of all property on Schedule A/B. Add lines 91a+91b=92		<u>\$405,237.24</u>

**Exhibit “2”
Auction Contract**

Fischer Auction Co. Inc.

(619) 590-2828

8711 N. Magnolia Ave Suite 300 – Santee – CA 92071

Fax: (619) 590-0744

January 26, 2023

Charles W. Daff
2107 N. Broadway Suite 308
Santa Ana, CA 92706

RE: Interior Solutions, Inc.
BK# 6:22-14774-RB

Dear Mr. Daff:

We have reviewed these assets of Interior Solutions, Inc.

Wood working equipment, tools, truck, forklift, office furniture, and office machines.

Fischer Auction Company could conduct a Public Online Auction of these assets under the following terms:

- Commission to be 10% of the gross proceeds
- Expense allowance for advertising not to exceed \$3,500, labor not to exceed \$5,500, payoff to Toyota Industries for 2014 Freightliner not to exceed \$18,000, for a total of expenses not to exceed \$27,000.
- A 10% Buyer's Premium to be charged to all buyers, an additional 2% will be charged to all buyers and paid to Proxibid for online bidding services, an additional 3% will be charged to all buyers paying with a credit card.

Fischer Auction Company, Inc. could conduct a public online auction on Tuesday, March 7th, 2023 at 10am with a preview inspection on Monday March 6th, 2023 from 10:00AM-4:00PM. At 2304 S. Castle Harbour Place, Ontario, CA 91761. Online auction access available via <http://fischerauctions.proxibid.com>

I expect the gross proceeds of the sale to be approximately \$93,750.

We look forward to the opportunity to be of service to you.

Sincerely,

Fischer Auction Co. Inc.
Jeff Bloom
(s) Jeff Bloom

**Exhibit “3”
Blanket Bond**

DUPLICATE ORIGINAL

**CONTINUATION CERTIFICATE
SURETY BOND**

**INTERNATIONAL FIDELITY INSURANCE COMPANY
ATLANTA, GA**

In Consideration of \$3,125.00 Dollars renewal premium
the term of Bond No. 0434269 in the amount of \$250,000 issued
on behalf of FISCHER AUCTION CO. INC.
located at 8711 N. MAGNOLIA AVE, STE 300
SANTEE, CA 92071

in favor of United States of America, SOUTHERN DISTRICT OF CALIFORNIA
402 W. BROADWAY, SUITE 600
SAN DIEGO, CA 92101

in connection with ANNUAL BANKRUPTCY AUCTIONEER BOND
is hereby extended for a period beginning JANUARY 9, 2022 to JANUARY 9, 2025
subject to all covenants and conditions of said bond.

This certificate is designed to extend only the life of the bond. It does not increase the amount
which may be payable thereunder. The aggregate liability of the Company under the said bond
together with this certificate shall be exactly the same as, and no greater than it would have been,
if the said bond had originally been written to expire on the date to which it is now being
extended.

*Signed, sealed and dated
OCTOBER 25, 2021

INTERNATIONAL FIDELITY INSURANCE COMPANY

By:  1-26-22

EXHIBIT "3"

**HARCO NATIONAL INSURANCE COMPANY
INTERNATIONAL FIDELITY INSURANCE COMPANY**

Member companies of IAT Insurance Group, Headquartered: 702 Oberlin Road, Raleigh, North Carolina 27605

KNOW ALL MEN BY THESE PRESENTS: That **HARCO NATIONAL INSURANCE COMPANY**, a corporation organized and existing under the laws of the State of Illinois, and **INTERNATIONAL FIDELITY INSURANCE COMPANY**, a corporation organized and existing under the laws of the State of New Jersey, and having their principal offices located respectively in the cities of Rolling Meadows, Illinois and Newark, New Jersey, do hereby constitute and appoint

LINDA C. SHEFFIELD, CONWAY C. MARSHALL, STEPHEN BEAHM, DAVID C. JOSEPH, JESSICA PALMERI, ROXANNE CRAVEN, ANDREA BECKER, CLARK P. FITZ-HUGH, DARLENE A. BORNT, CATHERINE C. KEHOE, KRISTINE DONOVAN, ELIZABETH W. KEARNEY

New Orleans, LA

their true and lawful attorney(s)-in-fact to execute, seal and deliver for and on its behalf as surety, any and all bonds and undertakings, contracts of indemnity and other writings obligatory in the nature thereof, which are or may be allowed, required or permitted by law, statute, rule, regulation, contract or otherwise, and the execution of such instrument(s) in pursuance of these presents, shall be as binding upon the said **HARCO NATIONAL INSURANCE COMPANY** and **INTERNATIONAL FIDELITY INSURANCE COMPANY**, as fully and amply, to all intents and purposes, as if the same had been duly executed and acknowledged by their regularly elected officers at their principal offices.

This Power of Attorney is executed, and may be revoked, pursuant to and by authority of the By-Laws of **HARCO NATIONAL INSURANCE COMPANY** and **INTERNATIONAL FIDELITY INSURANCE COMPANY** and is granted under and by authority of the following resolution adopted by the Board of Directors of **INTERNATIONAL FIDELITY INSURANCE COMPANY** at a meeting duly held on the 13th day of December, 2018 and by the Board of Directors of **HARCO NATIONAL INSURANCE COMPANY** at a meeting held on the 13th day of December, 2018.

"**RESOLVED**, that (1) the Chief Executive Officer, President, Executive Vice President, Senior Vice President, Vice President, or Secretary of the Corporation shall have the power to appoint, and to revoke the appointments of, Attorneys-in-Fact or agents with power and authority as defined or limited in their respective powers of attorney, and to execute on behalf of the Corporation and affix the Corporation's seal thereto, bonds, undertakings, recognizances, contracts of indemnity and other written obligations in the nature thereof or related thereto; and (2) any such Officers of the Corporation may appoint and revoke the appointments of joint-control custodians, agents for acceptance of process, and Attorneys-in-fact with authority to execute waivers and consents on behalf of the Corporation; and (3) the signature of any such Officer of the Corporation and the Corporation's seal may be affixed by facsimile to any power of attorney or certification given for the execution of any bond, undertaking, recognizance, contract of indemnity or other written obligation in the nature thereof or related thereto, such signature and seals when so used whether heretofore or hereafter, being hereby adopted by the Corporation as the original signature of such officer and the original seal of the Corporation, to be valid and binding upon the Corporation with the same force and effect as though manually affixed."

IN WITNESS WHEREOF, **HARCO NATIONAL INSURANCE COMPANY** and **INTERNATIONAL FIDELITY INSURANCE COMPANY** have each executed and attested these presents on this 31st day of December, 2018



STATE OF NEW JERSEY
County of Essex

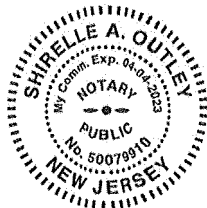
Kenneth Chapman

Executive Vice President, Harco National Insurance Company
and International Fidelity Insurance Company

STATE OF ILLINOIS
County of Cook



On this 31st day of December, 2018, before me came the individual who executed the preceding instrument, to me personally known, and, being by me duly sworn, said he is the therein described and authorized officer of **HARCO NATIONAL INSURANCE COMPANY** and **INTERNATIONAL FIDELITY INSURANCE COMPANY**; that the seals affixed to said instrument are the Corporate Seals of said Companies; that the said Corporate Seals and his signature were duly affixed by order of the Boards of Directors of said Companies.



IN TESTIMONY WHEREOF, I have hereunto set my hand affixed my Official Seal, at the City of Newark, New Jersey the day and year first above written.

Shirelle A. Outley a Notary Public of New Jersey
My Commission Expires April 4, 2023

CERTIFICATION

I, the undersigned officer of **HARCO NATIONAL INSURANCE COMPANY** and **INTERNATIONAL FIDELITY INSURANCE COMPANY** do hereby certify that I have compared the foregoing copy of the Power of Attorney and affidavit, and the copy of the Sections of the By-Laws of said Companies as set forth in said Power of Attorney, with the originals on file in the home office of said companies, and that the same are correct transcripts thereof, and of the whole of the said originals, and that the said Power of Attorney has not been revoked and is now in full force and effect.

IN TESTIMONY WHEREOF, I have hereunto set my hand on this day, 1/26/2022

Irene Martins, Assistant Secretary

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: **100 Spectrum Center Drive, Suite 600, Irvine, California 92618**

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*) **January 31, 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:

- **Attorney for Trustee:** Lynda T Bui lbui@shulmanbastian.com, ecf filings@shblp.com
- **Chapter 7 Trustee:** Charles W Daff (TR) charleswdaff@gmail.com, c122@ecfcbis.com
- **Interested Party:** R Gibson Pagter gibson@ppilawyers.com, pagterandperryisaacson@jubilee bk.net
- **Attorney for Debtor:** Thomas J Polis tom@polis-law.com, paralegal@polis-law.com; r59042@notify.bestcase.com
- **Interested Party:** United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **January 31, 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*) _____, 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.

January 31, 2023
Date

Erlanna Lohayza
Printed Name

/s/ Erlanna Lohayza
Signature

U.S. MAIL SERVICE LIST

DEBTOR

INTERIOR SOLUTIONS, INC.
PO BOX 8820
RANCHO CUCAMONGA, CA
91701-0820

NEF - ATTORNEY FOR DEBTOR

THOMAS J POLIS
POLIS & ASSOCIATES, APLC
19800 MACARTHUR BLVD
STE 1000
IRVINE, CA 92612-2433

NEF - INTERESTED PARTY

UNITED STATES TRUSTEE (RS)
3801 UNIVERSITY AVENUE,
SUITE 720
RIVERSIDE, CA 92501-3255

NEF - CHAPTER 7 TRUSTEE

CHARLES W DAFF (TR)
2107 N. BROADWAY
SUITE 308
SANTA ANA, CA 92706-2634

NEF - INTERESTED PARTY

DEAGUIAR FAMILY TRUST
C/O PAGTER AND PERRY
ISAACSON
525 N. CABRILLO PARK DRIVE
SUITE 104
SANTA ANA, CA 92701-5017

CREDITOR LISTING

EMPLOYMENT DEVELOPMENT
DEPT.
BANKRUPTCY GROUP MIC 92E
P.O. BOX 826880
SACRAMENTO, CA 94280-0001

CREDITOR LISTING

FRANCHISE TAX BOARD
BANKRUPTCY SECTION MS: A-
340
P.O. BOX 2952
SACRAMENTO, CA 95812-2952

CREDITOR LISTING

ARCO NATIONAL
CONSTRUCTION
900 NORTH ROCK HILL ROAD
SAINT LOUIS, MO 63119-1315

CREDITOR LISTING

ABOUT TIME
58 NORTH 1100 WEST #2
PAYSON, UT 84651-5715

CREDITOR LISTING

AMAZON PRIME
410 TERRY AVENUE NORTH
SEATTLE, WA 98109-5210

CREDITOR LISTING

AMERICAN EXPRESS
P.O. BOX 96001
LOS ANGELES, CA 90096-8000

CREDITOR LISTING

ANDREW RODRIGUEZ
761 W. 5TH STREET
ONTARIO, CA 91762-1535

CREDITOR LISTING

ANYDESK.COM
201 N. FRANKLING STREET,
SUITE 1300
TAMPA, FL 33602-5162

CREDITOR LISTING

BUSINESS TEAM
131 A STONY CIRCLE, SUITE 500
SANTA ROSA, CA 95401-9600

CREDITOR LISTING

CARBIDE SAW & TOOL, INC.
336 S. WATERMAN AVENUE,
UNIT P
SAN BERNARDINO, CA 92408-
1534

CREDITOR LISTING

CHINO COMMERCIAL BANK
14245 PIPELINE AVENUE
CHINO, CA 91710-5639

CREDITOR LISTING

CLEAR IMAGING
711 S. CARSON STREET, SUITE
#4
CARSON CITY, NV 89701-5292

CREDITOR LISTING

CONSTRUCTCONNECT
30 TECHNOLOGY PARKWAY
SOUTH
SUITE 100
NORCROSS, GA 30092-2925

CREDITOR LISTING

COUNTERTOP FACTORY
2740 E. CORONADO STREET
ANAHEIM, CA 92806-2401

CREDITOR LISTING

DREES WOOD PRODUCTS
14020 ORANGE STREET
PARAMOUNT, CA 90723-2018

CREDITOR LISTING

DANIEL DIMAIO
736 E. SAN FRANCISCO AVENUE
POMONA, CA 91767-4824

CREDITOR LISTING

DEAGUIAR FAMILY TRUST DBA
CCQ, LLC
5486 INDUSTRIAL PARKWAY
SAN BERNARDINO, CA 92407-
1855

CREDITOR LISTING

DOUGLAS CHADWICK
6183 MALVERN AVENUE
ALTA LOMA, CA 91737-3736

CREDITOR LISTING

DREAMHOST
PMB #327
417 ASSOCIATED ROAD
BREA, CA 92821-5802

CREDITOR LISTING

E.B. BRADLEY CO.
DEPT. 710002
P.O. BOX 514670
LOS ANGELES, CA 90051-4670

CREDITOR LISTING

EDI UMANA
921 RICHLAND STREET, APT #D
UPLAND, CA 91786-6853

CREDITOR LISTING

EXXONMOBILE CARD SERVICES
C/O WRIGHT EXPRESS
FINANCIAL SERV
FLEET SERVICES
PO BOX 6293
CAROL STREAM, IL 60197-6293

CREDITOR LISTING

FEDERAL EXPRESS
PO BOX 7221
PASADENA, CA 91109-7321

CREDITOR LISTING

GLC MILLWORKS
100 W. WALNUT AVENUE
FULLERTON, CA 92832-2345

CREDITOR LISTING

GAGGLES, LLC
8656 UTICA AVENUE, SUITE 150
RANCHO CUCAMONGA, CA
91730-4846

CREDITOR LISTING

GUILLERMO GONZALEZ
8015 HENBANE STREET
RANCHO CUCAMONGA, CA
91739-9313

CREDITOR LISTING

HEXAGON MANUFACTURING
INTELLIGENCE
C/O CABINET VISION
1300 MCFARLAND BLVD. NE,
SUITE 350
TUSCALOOSA, AL 35406-2282

CREDITOR LISTING

HOME DEPOT CREDIT SERVICES
DEPT 32-2149839106
P.O. BOX 9001030
LOUISVILLE, KY 40290-1030

CREDITOR LISTING

ICW GROUP
P.O. BOX 85563
SAN DIEGO, CA 92186-5563

CREDITOR LISTING

INFINITY
P.O. BOX 873116
VANCOUVER, WA 98687-3116

CREDITOR LISTING

INTERIORS PLUS
239 N. INDUSTRY WAY
UPLAND, CA 91786-4570

CREDITOR LISTING

JOHN B. PARKER
150 N. MOUNTAIN
CLAREMONT, CA 91711-4540

CREDITOR LISTING

JOSE BENITEZ GARCIA
1456 E. PHILADELPHIA STREET,
SPC 123
ONTARIO, CA 91761-5735

CREDITOR LISTING

JUAN G. RIOS
1008 E. MARGARITA ROAD
RIALTO, CA 92376-3774

CREDITOR LISTING

KAISER FOUNDATION HEALTH
PLAN
P.O. BOX 741562
LOS ANGELES, CA 90074-1562

CREDITOR LISTING

KONICA MINOLTA PREMIER
FINANCE
P.O. BOX 030310
LOS ANGELES, CA 90030-0310

CREDITOR LISTING

LOUIS & COMPANY
P.O. BOX 2253
BREA, CA 92822-2253

CREDITOR LISTING

MARCO A. VAZQUEZ
22844 CHAMBRAY DRIVE
MORENO VALLEY, CA 92557-6918

CREDITOR LISTING

MARKEL INSURANCE COMPANY
EVANSTON INSURANCE
COMPANY
4521 HIGHWOODS PARKWAY
GLEN ALLEN, VA 23060-6513

CREDITOR LISTING

METRIE EL & EL, LLC
9129 REMINGTON AVENUE
CHINO, CA 91710-9350

CREDITOR LISTING

MICHAEL A. LUGO
6722 OPAL STREET
ALTA LOMA, CA 91701-4742

CREDITOR LISTING

MIGUEL A. LOPEZ
130 E. BUDD STREET
ONTARIO, CA 91761-4201

CREDITOR LISTING

MOBILE MINI
P.O. BOX 650882
DALLAS, TX 75265-0882

CREDITOR LISTING

NAPA VALLEY INSURANCE
SERVICES
1932 SIERRA AVENUE
NAPA, CA 94558-2841

CREDITOR LISTING

NETWORK SOLUTIONS
5335 GATE PARKWAY
JACKSONVILLE, FL 32256-3071

CREDITOR LISTING

OFFICE DEPOT BUSINESS
CREDIT
DEPT 56 - 8600403349
P.O. BOX 78004
PHOENIX, AZ 85062-8004

CREDITOR LISTING

ONTARIO MUNICIPAL UTILITIES
1333 S. BON VIEW AVENUE
P.O. BOX 8000
ONTARIO, CA 91761-1076

CREDITOR LISTING

OVER EASY, INC.
8656 UTICA AVENUE, SUITE 150
RANCHO CUCAMONGA, CA
91730-4846

CREDITOR LISTING

PACIFIC COAST PROPANE
P.O. BOX 0427
RIALTO, CA 92377-0427

CREDITOR LISTING

PETERMAN LUMBER, INC.
10330 ELM AVENUE
FONTANA, CA 92337-7394

CREDITOR LISTING

RONALD BENNER
10210 BASELINE ROAD, SP #171
RANCHO CUCAMONGA, CA
91701-6046

CREDITOR LISTING

RONALD E. SHARRIT
3238 ROBERDS DRIVE
SAN BERNARDINO, CA 92405-
1809

CREDITOR LISTING

SC FUELS
P.O. BOX 14014
ORANGE, CA 92863-1414

PREFERRED ADDRESS

SOUTHERN CALIFORNIA EDISON
COMPANY
1551 W SAN BERNARDINO ROAD
COVINA CA 91722-3407

CREDITOR LISTING

SCM GROUP NORTH AMERICA
2475 SATELLITE BLVD.
DULUTH, GA 30096-5812

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SANDRA MOLINA
P.O. BOX 4560
ONTARIO, CA 91761-0818

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SEAN M. TERRY
6367 KINLOCK STREET
ALTA LOMA, CA 91737-3727

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SPARKLETTS
PO BOX 660579
DALLAS, TX 75266-0579

CREDITOR LISTING

STAMPS.COM
1990 E. GRAND AVENUE
EL SEGUNDO, CA 90245-5013

CREDITOR LISTING

SUSAN HENRY
742 VIA LOS SANTOS
SAN DIMAS, CA 91773-3151

CREDITOR LISTING

SYSTEM SECURITY
1001 AVENIDA PICO, SUITE C623
SAN CLEMENTE, CA 92673-6957

CREDITOR LISTING

TPX COMMUNICATIONS
P.O. BOX 509013
SAN DIEGO, CA 92150-9013

CREDITOR LISTING

TERMINIX PROCESSING CENTER
P.O. BOX 802155
CHICAGO, IL 60680-2155

CREDITOR LISTING

TERRY B. GRIZZLE
2771 W. VIA BELLO DRIVE
RIALTO, CA 92377-3528

CREDITOR LISTING

TERRY E. LEE
10850 CHURCH STREET
RANCHO CUCAMONGA, CA
91730-8952

CREDITOR LISTING

THE TOLL ROADS
125 PACIFICA, SUITE 120
IRVINE, CA 92618-3324

CREDITOR LISTING

TOYOTA INDUSTRIES
COMMERCIAL
PO BOX 660926
DALLAS, TX 75266-0926

CREDITOR LISTING

ULINE
P.O. BOX 88741
CHICAGO, IL 60680-1741

CREDITOR LISTING

VERIZON WIRELESS
PO BOX 660108
DALLAS, TX 75266-0108

CREDITOR LISTING

VISTA PAINT CORP
2020 E. ORANGETHORPE
AVENUE
FULLERTON, CA 92831-5327

CREDITOR LISTING

IDRIVE, INC.
26115 MUREAU ROAD, SUITE A
CALABASAS, CA 91302-3179

RETURNED MAIL

n/a

RIVERSIDE DIVISION
3420 TWELFTH STREET,
RIVERSIDE, CA 92501-3819

n/a

OFFICE OF THE US TRUSTEE,
SANTA ANA
411 WEST FOURTH ST, STE 7160
SANTA ANA, CA 92701-4500