

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>ROBERT E. OPERA – State Bar No. 101182 ropera@wghlawyers.com RICHARD H. GOLUBOW – State Bar No. 160434 rgolubow@wghlawyers.com PETER W. LIANIDES – State Bar No. 160517 plianides@wghlawyers.com WINTHROP GOLUBOW HOLLANDER, LLP 1301 Dove Street, Suite 500 Newport Beach, CA 92660 Telephone: (949) 720-4100 Facsimile: (949) 720-4111 [Proposed] General Insolvency Counsel for Debtor</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Debtor and Debtor-in-Possession</p>	<p>FOR COURT USE ONLY</p>
--	---------------------------

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION**

<p>In re:</p> <p>SILVER CREEK INDUSTRIES, LLC,</p> <p align="right">Debtor(s).</p>	<p>CASE NO.: 6:23-11677-SY CHAPTER: 11</p> <p align="center">NOTICE OF SALE OF ESTATE PROPERTY</p>
--	---

<p>Sale Date: 05/25/2023</p>	<p>Time: 10:00 a.m.</p>
<p>Location: Winthrop Golubow Hollander, LLP, 1301 Dove Street, Suite 500, Newport Beach, CA 92660</p>	

Type of Sale: Public Private **Last date to file objections:** 05/19/2023

Description of property to be sold:

Substantially all of the assets and properties associated with the Debtor’s business (“Business”), and assets and properties owned by two non-debtor affiliates of the Debtor, Silver Creek Industries RS, LLC (“SCRS”) and Silver Creek Leasing, LLC (“SCL”), which are used by the Debtor in the operation of the Debtor’s Business, except for the specifically identified “Excluded Assets,” in accordance with the terms and conditions of the Asset Purchase Agreement (the assets to be sold by Debtor, SCRS and SCL (collectively, “Sellers”) are referred to herein, collectively, as the “Marketed Assets”).

Terms and conditions of sale:

Silver Creek Modular, LLC, a wholly-owned subsidiary of Webb Investments Co., LLC (“Stalking Horse Bidder”), has provided to Sellers an offer to acquire Marketed Assets, and Sellers have accepted that offer, subject to the Debtor’s obtaining better and more favorable bids as set forth in the Second Amended Sale Procedures Memorandum and in the Sale Procedures Order, and the approval of the Bankruptcy Court.

Proposed sale price: \$ 15,500,000.00, plus assumption of certain liabilities of the Debtor, as set forth in the Asset Purchase Agreement.

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):

Overbid procedures are described in that Second Amended Sale Procedures Memorandum. The Bid Deadline is May 24, 2023, at 3:00 p.m., Pacific time. An auction will be held on May 25, 2023, at 10:00 a.m., Pacific time, at the office of Debtor's counsel, Winthrop Golubow Hollander, LLP, located at 1301 Dove Street, Suite 500, Newport Beach, CA 92660. The initial overbid must be in an amount not less than \$100,000 in cash. Subsequent overbids by any bidder (including the Stalking Horse Bidder) must be in minimum increments of not less than \$25,000.

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

A hearing on the Sale Motion ("Sale Motion Hearing") will be held on May 30, 2023, at 1:30 p.m., Pacific time, before the Honorable Scott H. Yun, U.S. Bankruptcy Judge, in the United States Bankruptcy Court, Central District of California, 3420 Twelfth Street, Courtroom 302, Riverside, CA 92501, to confirm the results of the Auction, approve the sale of the Marketed Assets to the successful bidder at the Auction ("Successful Bidder"), and approve the other relief requested in the Sale Motion.

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

FOR FURTHER INFORMATION REGARDING THE MARKETED ASSETS, DUE DILIGENCE, OR THE SALE PROCESS, PLEASE CONTACT THE FOLLOWING:

Debtor's [Proposed] Counsel:

Robert E. Opera, Esq.

Richard H. Golubow, Esq.

Peter W. Lianides, Esq.

Winthrop Golubow Hollander,

LLP 1301 Dove Street, Suite 500

Newport Beach, California 92660

Telephone: (949) 720-4100

E-mail: ropera@wghlawyers.com

Date: 05/12/2023

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 1301 Dove Street, Suite 500, Newport Beach, CA 92660.

A true and correct copy of the foregoing document entitled: **NOTICE OF SALE OF ESTATE PROPERTY** 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 **May 12, 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:

- **Theodore A Cohen** tcohen@sheppardmullin.com, mtzeng@sheppardmullin.com
- **Abram Feuerstein** abram.s.feuerstein@usdoj.gov
- **James Ficenec** james.ficenec@ndlf.com
- **Michael I. Gottfried** mgottfried@elkinskalt.com, cavila@elkinskalt.com, lwageman@elkinskalt.com, docketing@elkinskalt.com
- **Everett L Green** everett.l.green@usdoj.gov
- **Jennifer C Hayes** jhayes@mckennalong.com, aworthing@mckennalong.com
- **Leslie R Horowitz** leslie.horowitz@offitkurman.com, arvin.setaghaian@offitkurman.com
- **Lance N Jurich** ljurich@loeb.com, pmatsuda@loeb.com; ladocket@loeb.com; ljurich@ecf.courtdrive.com
- **Matthew I Kaplan** matthew.kaplan@tuckerellis.com, sofia.escalante@tuckerellis.com
- **Zi Chao Lin** zi.lin@tuckerellis.com, tcurrie@garrett-tully.com; mdakinmurele@garrett-tully.com
- **Christopher E Ng** cng@ggls.com
- **Robert E Opera** ropera@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **Jennifer Pruski** jpruski@trainorfairbrook.com
- **Cameron C Ridley** Cameron.Ridley@usdoj.gov
- **Edward Rubacha** er@jhkmlaw.com, docket@jhc.law; am@jhc.law
- **United States Trustee (RS)** ustpregion16.rs.ecf@usdoj.gov
- **S Christopher Yoo** cyoo@fbtlaw.com, vdelgado@fbtlaw.com

2. SERVED BY UNITED STATES MAIL: On **May 12, 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.

The Honorable Judge Scott H. Yun
United States Bankruptcy Court
Central District of California
3420 Twelfth Street, Suite 345 / Courtroom 302
Riverside, CA 92501-3819

3. SERVED BY PERSONAL DELIVERY (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **May, 2023**, I served the following persons and/or entities by **personal delivery**, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

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

May 12, 2023
Date

Silvia Villegas
Printed Name

/s/ Silvia Villegas
Signature