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| Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address<br>Christopher B. Ghio (State Bar No. 259094)<br>Christopher Celentino (State Bar No. 131688)<br>DINSMORE & SHOHL LLP<br>655 West Broadway, Suite 800<br>San Diego, CA 92101<br>Telephone: 619.400.0500<br>Facsimile: 619.400.0501<br>christopher.ghio@dinsmore.com<br>christopher.celentino@dinsmore.com<br><br><input type="checkbox"/> Individual appearing without attorney<br><input checked="" type="checkbox"/> Attorney for: Richard Marshack, Chapter 11 Trustee | FOR COURT USE ONLY |
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**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

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| In re:<br><br>THE LITIGATION PRACTICE GROUP P.C.,<br><br><br><br><br><br><br><br><br><br>Debtor(s). | CASE NO.: 8:23-bk-10571-SC<br>CHAPTER: 11<br><br><br><br><br><br><br><br><br><br><p style="text-align: center;"><b>NOTICE OF SALE OF ESTATE PROPERTY</b></p> |
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|  |                       |
|--|-----------------------|
| <b>Sale Date:</b> 07/21/2023   | <b>Time:</b> 10:00 am |
| <b>Location:</b> Courtroom 5C, 411 W. Fourth Street, Santa Ana, CA 92701 |                       |

**Type of Sale:**  Public  Private      **Last date to file objections:** 07/19/2023

**Description of property to be sold:**

The estate's rights, title, and interest in the following: Consumer client accounts, personal property leases, equipment and furniture, prepayments, legal service agreements, intellectual property, authorizations and licenses, and Luna, the debtor's proprietary CRM

**Terms and conditions of sale:**

\$1 million First Deposit; \$7 million Second Deposit; 20% fee collected by Buyer on Active Executory Contracts and 15% on Inactive Executory Contracts, up to Total Purchase Price; first \$2 million of Purchase Price from deposits shall cover administrative expenses; \$4,000,000 of the Purchase Price from the Second Deposit is in consideration for Goodwill, Licenses, and Luna; CLG entitled to \$400 per contract reversion if no client consent

**Proposed sale price:** Approximately \$ 42,000,000.00

**Overbid procedure (if any):**

Overbid packages must be received by July 17, 2023 at 5:00 p.m. and include a (i) good faith deposit of \$1,000,000 and (ii) letter of intent to enter into similar APA as the one attached to the sale motion, but for a price adjustment of the Second Deposit. Initial Overbid will be \$7,500,000.00 with increasing increments of \$500,000.00 thereafter.

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

July 21, 2023 at 10:00 a.m.  
Courtroom 5C  
411 W. Fourth Street  
Santa Ana, CA 92701

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

Christopher B. Ghio, Esq., Special Counsel to Chapter 11 Trustee  
Dinsmore & Shohl LLP  
655 West Broadway, Suite 800  
San Diego, CA 92101  
Tel: 619.400.0500  
Email: christopher.ghio@dinsmore.com

Date: 07/11/2023

## 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: 655 W. Broadway, Suite 800, San Diego, California 92101

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 July 11, 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:

Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**: On July 11, 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 July 11, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

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

|                              |                                    |                                     |
|------------------------------|------------------------------------|-------------------------------------|
| <u>July 11, 2023</u><br>Date | <u>Caron Burke</u><br>Printed Name | <u>/s/ Caron Burke</u><br>Signature |
|------------------------------|------------------------------------|-------------------------------------|

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

Eric Bensamochan on behalf of Interested Party Eric Bensamochan  
eric@eblawfirm.us, G63723@notify.cincompass.com

Ronald K Brown on behalf of Creditor SDCO Tustin Executive Center, Inc.  
ron@rkbrownlaw.com

Christopher Celentino on behalf of Plaintiff Richard A. Marshack  
christopher.celentino@dinsmore.com, caron.burke@dinsmore.com

Christopher Celentino on behalf of Trustee Richard A Marshack (TR)  
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Richard H Golubow on behalf of Creditor MC DVI Fund 1, LLC  
rgolubow@wghlawyers.com, jmartinez@wghlawyers.com;svillegas@wghlawyers.com

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D Edward Hays on behalf of Trustee Richard A Marshack (TR)

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Ira David Kharasch on behalf of Interested Party Courtesy NEF  
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Laila Masud on behalf of Interested Party Richard A. Marshack  
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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Laila Masud on behalf of Plaintiff Richard Marshack  
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Laila Masud on behalf of Trustee Richard A Marshack (TR)  
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Kenneth Miskin on behalf of U.S. Trustee United States Trustee (SA)  
Kenneth.M.Miskin@usdoj.gov

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Gregory M Salvato on behalf of Interested Party Courtesy NEF  
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Olivia Scott on behalf of Creditor Hi Bar Capital LLC  
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Jonathan Serrano on behalf of Trustee Richard A Marshack (TR)  
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Paul R Shankman on behalf of Attorney Paul R. Shankman  
PShankman@fortislaw.com, info@fortislaw.com

Paul R Shankman on behalf of Creditor United Partnerships, LLC

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Andrew Still on behalf of Interested Party Courtesy NEF  
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United States Trustee (SA)  
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**2. SERVED BY UNITED STATES MAIL:**

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BMF Advance  
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BROOKLYN, NY 11230

ProofPositive LLC  
30 N Gould St,  
STE R  
Sheridan, WY 82801

C T CORPORATION SYSTEM, AS  
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CITY CAPITAL NY  
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BROOKLYN, NY 11218

World Global Fund LLC  
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C T CORPORATION SYSTEM, AS  
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330 N BRAND BLVD, SUITE 700  
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CORPORATION SERVICE COMPANY, AS  
REPRESENTATIVE  
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C T CORPORATION SYSTEM, AS  
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