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FARM CREDIT WEST, FLCA
8

9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **SANTA ANA DIVISION**
12

13 In re
14 NORTHERN HOLDING, LLC,
15 Debtor.
16
17
18

Case No. 8:20-bk-13014-MW

Chapter 7

**STIPULATION BETWEEN CHAPTER 7
TRUSTEE AND SECURED CREDITOR
FARM CREDIT WEST, FCLA RE:
IMMEDIATE ENTRY OF ORDER
GRANTING MOTION FOR RELIEF
FROM AUTOMATIC STAY**

19 TO THE HONORABLE MARK S. WALLACE, UNITED STATES BANKRUPTCY JUDGE:

20 This stipulation is entered into between Richard A. Marshack, in his capacity as Chapter 7
21 Trustee ("Trustee") of the Bankruptcy Estate ("Estate") of Northern Holding, LLC ("Debtor"), on
22 one hand, and Farm Credit West, FCLA ("FCW"), on the other hand, through their respective
23 counsel, with regard to the immediate entry of the Order Granting Motion for Relief from the
24 Automatic Stay Under 11 U.S.C. § 362. Collectively, the Trustee and FCW will be referred to as
25 the "Parties."

26 **Recitals**

27 A. On October 28, 2020, Debtor filed a voluntary petition for bankruptcy under
28 Chapter 11 of Title 11 of the United States Code, initiating the above-captioned bankruptcy case.

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FCW is the senior secured lender holding a lien on substantially all assets of the Debtor.

B. On November 6, 2020, FCW filed a motion for relief from stay as to its real and personal property collateral (the "Motion"), Dkt. No. 11.

C. On June 15, 2021, the case was converted to Chapter 7 and the Trustee was appointed as the Chapter 7 trustee for the Estate.

D. On August 26, 2021, as Dk. No. 201, Trustee filed a stipulation between him and FCW regarding stipulated relief from stay as to the Debtor's real properties effective as of December 1, 2021 ("Enforcement Date").

E. On September 7, 2021, as Dk. No. 210, the Court entered an order approving the stipulated terms for relief from stay as between Trustee and FCW ("Stay Relief Order"). The execution of this stipulation does not in and of itself satisfy the condition in paragraph 4 of the Stay Relief Order extending the Enforcement Date.

F. The Parties agree to the immediate entry of the supplemental relief from stay order attached as Exhibit 1, which clarifies the Stay Relief Order and sets forth the relief requested in the Motion.

The Parties agree and STIPULATE as follows:

1. The Order attached as Exhibit 1 and incorporated by reference shall be immediately entered by the Court.

DATED: December 15, 2021

FRANDZEL ROBINS BLOOM & CSATO, L.C.
MICHAEL J. GOMEZ
REED S. WADDELL
GERRICK M. WARRINGTON

By:

MICHAEL J. GOMEZ
Attorneys for Secured Creditor
FARM CREDIT WEST, FLCA

DATED: December 15, 2021

MARSHACK HAYS LLP

By:

D. EDWARD HAYS
TINHO MANG
Attorneys for RICHARD A. MARSHACK

EXHIBIT 1

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Michael J. Gomez (State Bar No. 251571) mgomez@frandzel.com Reed S. Waddell (State Bar No. 106644) rwaddell@frandzel.com FRANDZEL ROBINS BLOOM & CSATO, L.C. 1000 Wilshire Boulevard, Nineteenth Floor Los Angeles, California 90017-2427 Telephone: (323) 852-1000 Facsimile: (323) 651-2577 <input checked="" type="checkbox"/> <i>Attorney for Movant</i> <input type="checkbox"/> <i>Movant appearing without an attorney</i>	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – <u>SANTA ANA</u> DIVISION	
In re: NORTHERN HOLDINGS, LLC, Debtor(s).	CASE NO.: 8:20-bk-13014-MW CHAPTER: 11
	ORDER GRANTING MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (REAL PROPERTY)
	DATE: August 30, 2021 TIME: 2:00 p.m. COURTROOM: 6C PLACE: 411 West Fourth Street Santa Ana, CA 92701
Movant: Farm Credit West, FLCA	

1. The Motion was: ☒ Opposed ☐ Unopposed ☒ Settled by stipulation

2. The Motion affects the following real property and the personal property described in item no. 17 below (collectively, the "Property"):

Street address: 2380 Live Oak Rd

Unit/suite number:

City, state, zip code: Paso Robles, CA 93446

Legal description or document recording number (including county of recording):

☒ See attached page and item no. 17 below.

The Motion is granted under:

- a. ☒ 11 U.S.C. § 362(d)(1)
 - b. ☒ 11 U.S.C. § 362(d)(2)
 - c. ☐ 11 U.S.C. § 362(d)(3)
 - d. ☒ 11 U.S.C. § 362(d)(4). The filing of the bankruptcy petition was part of a scheme to hinder, delay, or defraud creditors that involved:
 - (1) ☒ The transfer of all or part ownership of, or other interest in, the Property without the consent of the secured creditor or court approval; and/or
 - (2) ☒ Multiple bankruptcy cases affecting the Property.
 - (3) ☒ The court ☒ makes ☐ does not make ☐ cannot make a finding that the Debtor was involved in this scheme.
 - (4) If recorded in compliance with applicable state laws governing notices of interests or liens in real property, this order shall be binding in any other case under this title purporting to affect the Property filed not later than 2 years after the date of the entry of this order by the court, except that a debtor in a subsequent case under this title may move for relief from this order based upon changed circumstances or for good cause shown, after notice and a hearing.
3. ☒ As to Movant, its successors, transferees and assigns, the stay of 11 U.S.C. § 362(a) is:
- a. ☒ Terminated as to the Debtor and the Debtor's bankruptcy estate.
 - b. ☐ Modified or conditioned as set forth in Exhibit _____ to this order.
 - c. ☐ Annulled retroactively to the bankruptcy petition date. Any postpetition acts taken by Movant to enforce its remedies regarding the Property do not constitute a violation of the stay.
4. ☒ Movant may enforce its remedies to foreclose upon and obtain possession of the Property in accordance with applicable nonbankruptcy law, but may not pursue any deficiency claim against the Debtor or property of the estate except by filing a proof of claim pursuant to 11 U.S.C. § 501.
5. ☐ Movant must not conduct a foreclosure sale of the Property before (date) _____.
6. ☐ The stay shall remain in effect subject to the terms and conditions set forth in the Adequate Protection Agreement contained within this order.
7. ☐ In chapter 13 cases, the trustee must not make any further payments on account of Movant's secured claim after entry of this order. The secured portion of Movant's claim is deemed withdrawn upon entry of this order without prejudice to Movant's right to file an amended unsecured claim for any deficiency. Absent a stipulation or order to the contrary, Movant must return to the trustee any payments received from the trustee on account of Movant's secured claim after entry of this order.
8. ☐ The co-debtor stay of 11 U.S.C. § 1201(a) or § 1301(a) is terminated, modified or annulled as to the co-debtor, as to the same terms and conditions as to the Debtor.
9. ☒ The 14-day stay as provided in FRBP 4001(a)(3) is waived.
10. This order is binding and effective despite any conversion of this bankruptcy case to a case under any other chapter of the Bankruptcy Code.
11. Movant, or its agents, may, at its option, offer, provide and enter into a potential forbearance agreement, loan modification, refinancing agreement or other loan workout or loss mitigation agreement. Movant, through its servicing agent, may contact the Debtor by telephone or written correspondence to offer such an agreement.

12. Upon entry of this order, for purposes of Cal. Civ. Code § 2923.5, the Debtor is a borrower as defined in Cal. Civ. Code § 2920.5(c)(2)(C).
13. ☒ A designated law enforcement officer may evict the Debtor and any other occupant from the Property regardless of any future bankruptcy case concerning the Property for a period of 180 days from the entry of this Order:
- (a) ☒ without further notice.
- (b) ☒ upon recording of a copy of this order or giving appropriate notice of its entry in compliance with applicable nonbankruptcy law.
14. ☐ This order is binding and effective in any bankruptcy case commenced by or against the Debtor for a period of 180 days, so that no further automatic stay shall arise in that case as to the Property.
15. ☒ This order is binding and effective in any bankruptcy case commenced by or against any debtor who claims any interest in the Property for a period of 180 days from entry of this Order:
- (a) ☒ without further notice.
- (b) ☒ upon recording of a copy of this order or giving appropriate notice of its entry in compliance with applicable nonbankruptcy law.
16. ☒ This order is binding and effective in any future bankruptcy case, no matter who the debtor may be
- (a) ☒ without further notice.
- (b) ☒ upon recording of a copy of this order or giving appropriate notice of its entry in compliance with applicable nonbankruptcy law.
17. ☒ Other (*specify*): Relief from the automatic stay is further granted under the grounds provided for above in item nos. 2.a., 2.b., 2.d., 3, 4, 9, 10, 15, and 16 as to the personal property described in the Security Agreement attached to the Motion as Exhibit 3 (Dkt. 11).

The Enforcement Date as defined and set forth in the Order Granting Relief from Stay (Dkt. 210), which affects the real properties, is being continued by separate stipulation and order. This Order does not affect that Enforcement Date.

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(This attachment is the continuation page for paragraph 2 of this order.)

2. The Motion affects the following real property:

<u>Property Name</u>	<u>APN</u>	<u>Property Address / Location</u>
Rabbit Ridge Winery	026-104-001	1172 San Marcos Road, Paso Robles, CA, 93446.
Texas Road Vineyard	027-145-022	Located along the north side of Texas Road, just north of San Marcos Road and ~1.5 miles west of Highway 101, being ~4 miles northwest of Paso Robles, in rural San Luis Obispo County.
Live Oak Vineyard	026-342-039	2380 Live Oak Road, Paso Robles, CA 93446. Located ~0.2 mile north of Live Oak Road and ~0.8 mile west of Arbor Road, being ~2.5 miles southwest of Paso Robles, in rural San Luis Obispo County.

Legal description or document recording number (including county of recording):

PARCEL A: APN 026,342,039

The Northeast quarter of Section 12, in Township 27 South, Range 11 East, Mount Diablo Base and Meridian, in the County of San Luis Obispo, State of California, according to the Official Plat of the Survey of said land approved by the Surveyor General.

PARCEL A-1:

An Easement for utility purposes beginning at Live Oak Road and extending North over the East 10 feet on the Northeast quarter of the Southeast quarter of Section 12, Township 27, Range 11, Mount Diablo Base and Meridian, in the County of San Luis Obispo, State of California, according to the Official Plat of the Survey of said land approved by the Surveyor General.

PARCEL A-2:

An Easement to provide ingress, egress, public utilities and incidental purposes to the Southwest quarter of the Northwest quarter of Section 12, Township 27 South, Range 11 East, Mount Diablo Base and Meridian over, under and upon a strip of land 30 feet wide located in the Southeast quarter of Section 12, Township 27 South, Range 11 East, Mount Diablo Base and Meridian, according to the Official Plat of the Survey of said land approved by the Surveyor General, and lying equally on each side of the following described centerline:

Commencing at the East quarter corner of said Section 12, said corner being shown as a ½" rebar capped RCE 14994 in Book 1, Page 159 of Official Records;

Thence along the Northerly line of the Southeast quarter of said Section 12, South 89°29'51" West, 1,393.11 feet more or less to the Southwest corner of the Southeast quarter of the Northeast quarter of said Section 12 and the True Point of Beginning;

Thence leaving said Northerly line South 20°22'08" West, 701.76 feet to a point which bears South 70°16' East, 17.00 feet from the center of a 48" live oak tree;

Thence South 10°30'20" West, 341.71 feet to a point which bears South 79°29' East, 15.00 feet from the center of a cattle guard;

Thence South 79°29' East to the center of Live Oak Road (County Road No. M5262).

The side lines of the above mentioned 30 foot strip shall be lengthened and shortened to meet the beginning and ending boundary lines.

PARCEL B: APN 026,021,070

The Southerly 40 acres of the North half of the Northwest quarter of Section 12, in Township 26 South, Range 11 East, Mount Diablo Base and Meridian, in the County of San Luis Obispo, State of California, according to the Official Plat of the Survey of said land approved by the Surveyor General.

EXCEPTING THEREFROM an undivided $\frac{1}{2}$ interest in and to all oil, gas and other hydrocarbon substances and minerals in or under said land, but without right of surface entry as reserved by Clara M. Guthier, a widow, in Deed recorded March 27, 1961 in Book 1115, Page 246 of Official Records.

PARCEL C: APN: 027,145,022

Government Lots 3 and 4 and the East half of the Southwest quarter of Section 31, Township 25 South, Range 12 East, Mount Diablo Base and Meridian, in the County of San Luis Obispo, State of California, according to the Official Plat of the Survey of said land approved by the Surveyor General, as described in Certificate of Compliance recorded September 13, 1985 as Instrument No. 052170 of Official Records.

EXCEPTING THEREFROM an undivided $\frac{1}{2}$ interest in the land owners share of royalties from oil, gas, other hydrocarbons, or minerals actually produced on or from said land or any part thereof, as reserved by George Blechen and Marie Blechen, his wife and Elsie Loose, a widow in Deed dated May 16, 1958 and recorded June 10, 1958 in Book 943, Page 507 of Official Records.

ALSO EXCEPTING 50% of grantors present interest in all oil, gas and other hydrocarbons and other minerals that are on or may be on or within said lands, together with 50% interest in and to all oil, gas and other hydrocarbons and other minerals as same may be increased upon expiration of royalty interests as reserved in Deed dated May 16, 1958 executed by George Blechen and Marie Blechen, his wife and by Elsie Loose, a widow and recorded June 10, 1958 in Book 943, Page 507 of Official Records.

Such mineral reservations in favor of grantors herein are without any right of entry to the surface of said land and are without any right of entry to the first 500 feet adjacent to and lying beneath the surface of said land.

PARCEL C-1:

A 30 foot wide Easement for ingress, egress and incidental purposes over that portion of Lot 4 of "Home of the Almond", in the County of San Luis Obispo, State of California, according to map recorded in, Book 2, Page 17 of Maps, the centerline of which is more particularly described as follows:

Commencing at the Southeast corner of said Lot 4;

Thence along the Easterly line of Lot 4, North $0^{\circ}30'00''$ West, 65.00 feet to the point of beginning;

Thence parallel to the South line of Lot 4, North $89^{\circ}45'00''$ West, 203.81 feet;

Thence South $73^{\circ}38'54''$ West, 138.47 feet;

Thence South $78^{\circ}42'47''$ West, 52.18 feet to a point that lies 15.00 feet North of the South line of said Lot 4;

Thence 15 feet Northerly of and parallel to said South line of Lot 4, North $89^{\circ}45'00''$ West, 559.74 feet to the Westerly line of Lot 4.

PARCEL D: APN: 026,104,001

Lot 4 of Section 5, Lots 1, 2, 3 and 4, the Southwest Quarter of the Northeast Quarter and the Southeast Quarter of the Northwest Quarter of Section 6, all in Township 26 South, Range 12 East, Mount Diablo Base and Meridian, in the County of San Luis Obispo, State of California, according to the official plate thereof.

EXCEPTING THEREFROM that portion lying South of San Marcos Road.

ALSO EXCEPTING THEREFROM $\frac{1}{2}$ of the oil, gas, mineral and other hydrocarbon substances in and under said land as reserved by Robert L. Linnett, a married man and Henry C. Brigham, a married man in equal shares by deed recorded June 21, 1977 in Book 1988, Page 755 of Official Records.

PARCEL E: APN: 014,311,014

The Northeast quarter of Section 23, Township 26 South, Range 10 East, Mount Diablo Base and Meridian, in the County of San Luis Obispo, State of California.

PARCEL E-1:

A right of way for ingress to and egress from said Parcel 1, and for the installation and maintenance of utility pipe and pole lines, in, upon, along and under a strip of land 40 feet wide, containing 0.038 acres in the Southwest corner of the Southeast quarter of Section 14, Township 26 South, Range 10 East, and 0.638 acres in the Southwest quarter of said section, the centerline of which strip of land is described as follows:

Beginning at a point 28 feet East of the South $\frac{1}{4}$ corner of Section 14, Township 26 South, Range 10 East, Mount Diablo Base and Meridian, and running thence North 45° West, 68.85 feet to a point 20 feet West of the Easterly boundary line of the Southwest quarter of Section 14;
Thence North and parallel to said Easterly boundary line, 343.9 feet to a point;
Thence North $42^{\circ}0'$ West, 28.5 feet to a point;
Thence North $59^{\circ}40'$ West, 293.5 feet more or less to the Southeasterly boundary line of the San Marcos-Adelaide County Road.

Situated in the State of California, Unincorporated Area, County of Sonoma, and described as follows:

PARCEL ONE

BEGINNING on section line at a point 14.30 chains South from the northwest corner of Section 5; Township 8 North, Range 9 West, M.D.B. & M., and running thence North $89^{\circ} 45'$ East, 63.21 chains to a station, thence North 69° East, 3.00 chains to an iron pin driven in the center of the county road leading from Healdsburg to Guerneville; thence South $13^{\circ} 45'$ East, 2.15 chains to an iron pin, thence South $14^{\circ} 30'$ East, 3.23 chains to an iron pin in the center of said road, thence North $77^{\circ} 15'$ East, 1.91 chains; thence South $33^{\circ} 40'$ East, 0.35 chains, thence South $74^{\circ} 45'$ East, 0.30 chains; thence North $84^{\circ} 30'$ East, 0.18 chains; thence North $62^{\circ} 30'$ East, 0.39 chains; thence North 37° East, 0.62 chains to a station; thence North $77^{\circ} 15'$ East, 24.82 chains to a stake driven in the middle of a slough in the division line between the lands herein described and the lands of John McClish; thence North 19° East, 2.71 chains; thence North $42^{\circ} 30'$ East, 1.46 chains, thence North 32° East, 2.25 chains; thence North $24^{\circ} 10'$ East, 0.65 chains to an iron pin at corner; thence South $78^{\circ} 15'$ West, 32.85 chains to an iron pin in the center of aforesaid county road; thence North 22° West, in the center of road, 2.49 chains to an iron pin; thence South $89^{\circ} 30'$ West, 65.00 chains to section line, and thence South on section line, 3.18 chains to the point of beginning.

EXCEPTING THEREFROM all that portion lying Easterly of the centerline of the Healdsburg — Guerneville Road.

PARCEL TWO

BEGINNING at a point, 14.30 chains South from the northwest corner of Section 5, Township 8 North, Range 9 West, M.D.B. & M., and running thence, North $89^{\circ} 45'$ East, 40.16 chains to a station in the center of a small creek, thence South 5.77 chains to the land of John McClish; thence West on said McClish's north line, 40.11 chains to section line; thence North on section line 5.54 chains to the point of beginning.

(110-070-026-000)

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 1000 Wilshire Boulevard, Nineteenth Floor, Los Angeles, CA 90017-2427.

A true and correct copy of the foregoing document entitled (*specify*): STIPULATION BETWEEN CHAPTER 7 TRUSTEE AND SECURED CREDITOR FARM CREDIT WEST, FCLA RE: IMMEDIATE ENTRY OF ORDER GRANTING MOTION FOR RELIEF FROM AUTOMATIC STAY 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*) December 16, 2021, 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:

- William H Brownstein Brownsteinlaw.bill@gmail.com
- Steve Burnell sburnell@sulmeyerlaw.com,
sburnell@ecf.courtdrive.com;sburnell@ecf.inforuptcy.com;mviramontes@sulmeyerlaw.com
- Nancy S Goldenberg nancy.goldenberg@usdoj.gov
- Michael J Gomez mgomez@frandzel.com, dmoore@frandzel.com
- D Edward Hays ehays@marshackhays.com,
ehays@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com
- Kari L Ley Ley1238@att.net
- Tinho Mang tmang@marshackhays.com,
tmang@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com;cmendoza@ecf.courtdrive.com
- Richard A Marshack (TR) pkraus@marshackhays.com,
rmarshack@iq7technology.com;ecf.alert+Marshack@titledxi.com
- Elissa Miller emiller@sulmeyerlaw.com, emillersk@ecf.inforuptcy.com;ccaldwell@sulmeyerlaw.com
- Roksana D. Moradi-Brovia roksana@rhmfir.com,
matt@rhmfir.com;rosario@rhmfir.com;susie@rhmfir.com;max@rhmfir.com;priscilla@rhmfir.com;pardis@rhmfir.com; russ@rhmfir.com;rebeca@rhmfir.com;david@rhmfir.com;sloan@rhmfir.com
- Paul F Ready tamara@farmerandready.com
- Matthew D. Resnik matt@rhmfir.com,
roksana@rhmfir.com;rosario@rhmfir.com;susie@rhmfir.com;max@rhmfir.com;priscilla@rhmfir.com;pardis@rhmfir.com; russ@rhmfir.com;rebeca@rhmfir.com;david@rhmfir.com;sloan@rhmfir.com
- Victor A Sahn vsahn@sulmeyerlaw.com,
pdillamar@sulmeyerlaw.com;pdillamar@ecf.inforuptcy.com;vsahn@ecf.inforuptcy.com;cblair@sulmeyerlaw.com;cblair@ecf.inforuptcy.com
- Kristine A Thagard kthagard@marshackhays.com,
kthagard@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com
- United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov
- Reed S Waddell rwaddell@frandzel.com, sking@frandzel.com
- Gerrick Warrington gwarrington@frandzel.com, sking@frandzel.com
- David Wood dwood@marshackhays.com,
dwood@ecf.courtdrive.com;lbuchananmh@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com

☐ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (date) _____, 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.

December 16, 2021

Date

David T. Moore

Printed Name

/s/ David T. Moore

Signature

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 1000 Wilshire Boulevard, Nineteenth Floor, Los Angeles, CA 90017-2427.

A true and correct copy of the foregoing document entitled (*specify*): STIPULATION BETWEEN CHAPTER 7 TRUSTEE AND SECURED CREDITOR FARM CREDIT WEST, FCLA RE: IMMEDIATE ENTRY OF ORDER GRANTING MOTION FOR RELIEF FROM AUTOMATIC STAY 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*) _____ 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 (*date*) December 16, 2021, 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.

Tom Proutzos
Goodman Neuman Hamilton LLP
One Post Street Suite 2100
San Francisco, CA 94104

☐ 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*) December 16, 2021, 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.

The Honorable Mark S. Wallace
U.S. Bankruptcy Court
Ronald Reagan Federal Building
Judge Wallace's mail slot by 6th Floor elevators
411 W. Fourth Street
Santa Ana, CA 92701

☐ 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.

December 16, 2021
Date

Michelle Campbell
Printed Name

/s/ Michelle Campbell
Signature