

1 JEFFREY W. BROKER – State Bar No. 53226  
PAMELA J. ZYLSTRA – State Bar No. 147977  
2 BROKER & ASSOCIATES PROFESSIONAL CORPORATION  
18111 Von Karman Avenue, Suite 460  
3 Irvine, CA 92612-7150  
Telephone: (949) 222-2000  
4 Facsimile: (949) 222-2022  
email: *jbroker@brokerlaw.biz*  
5  
6 General Reorganization Counsel  
for Reorganized Debtor  
7  
8

9 UNITED STATES BANKRUPTCY COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 RIVERSIDE DIVISION  
12

13 In re

14 KATHLEEN JOAN OTTO, aka KATHLEEN  
15 J. OTTO, aka KATHLEEN KJENSRUD  
16 OTTO, aka KATHLEEN K. OTTO, aka  
KATHY OTTO,

17  
18 Reorganized Debtor  
19

Case No. 6:12-bk-21607 MJ

Chapter 11 Proceeding

**MOTION OF REORGANIZED DEBTOR  
FOR FINAL DECREE AND ORDER  
CLOSING CASE; MEMORANDUM OF  
POINTS AND AUTHORITIES AND  
DECLARATIONS OF KATHLEEN  
OTTO, ROBERT F. BICHER, AND  
PAMELA J. ZYLSTRA IN SUPPORT  
THEREOF**

[FRBP §3022; LBR §§ 3020-1 and  
9013-1(o)]

**[REQUEST FOR JUDICIAL NOTICE  
FILED CONCURRENTLY HEREWITH]**

DATE: (No hearing set unless objection  
TIME: timely filed in response to Motion)  
PLACE:

1 **TO THE HONORABLE MEREDITH JURY, UNITED STATES BANKRUPTCY JUDGE;**  
2 **THE OFFICE OF THE UNITED STATES TRUSTEE; CREDITORS AND PARTIES IN**  
3 **INTEREST:**

4 KATHLEEN JOAN OTTO, aka KATHLEEN J. OTTO, aka KATHLEEN KJENSrud  
5 OTTO, aka KATHLEEN K. OTTO, aka KATHY OTTO, the Reorganized Debtor in the within  
6 Chapter 11 case (the "Debtor"), hereby moves this Court for a Final Decree and an Order Closing  
7 Case (the "Motion"). Pursuant to the Motion, the Reorganized Debtor will and hereby moves the  
8 Court for its Order granting it the following relief:

- 9
- 10 1. Entry of the discharge of the Debtor from any debt that arose before the date of  
11 confirmation of the Plan on April 29, 2013;
  - 12 2. Entry of the Court's Final Decree and Order Closing Case; and
  - 13 3. Entry of such other and further relief as the Court deems just and proper.

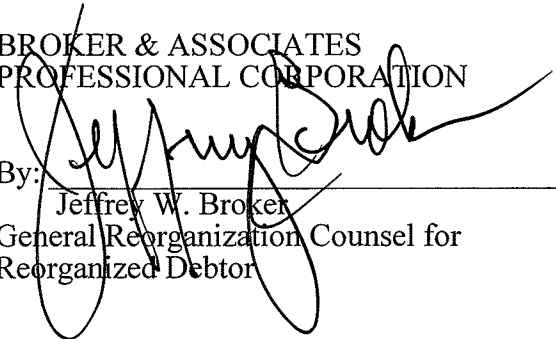
14 The Motion is based upon the foregoing request for relief, the attached memorandum of  
15 points and authorities, the declarations of the Plan Agent, Robert Bicher, (the "Bicher  
16 Declaration"), the Debtor, Kathleen Otto (the "Otto Declaration") and Pamela J. Zylstra (the  
17 "Zylstra Declaration") annexed hereto and the Request for Judicial Notice filed concurrently  
18 herewith all in support of the Motion.

19 Dated: January 7, 2014

20   
21 Kathleen Otto

22 PRESENTED BY:

23 BROKER & ASSOCIATES  
24 PROFESSIONAL CORPORATION

25 By:   
26 Jeffrey W. Broker  
27 General Reorganization Counsel for  
28 Reorganized Debtor

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **BACKGROUND FACTS**

4 The Reorganized Debtor commenced this case by filing a voluntary petition under  
5 Chapter 11 of the United States Bankruptcy Code on May 10, 2012 (the "Petition Date"). The  
6 Reorganized Debtor is a retired widow who was named as a defendant in a class action which was  
7 filed against her deceased husband and his corporate entities. Despite a jury verdict in favor of the  
8 Debtor, on March 5, 2012, the state court entered a judgment against the Debtor in excess of \$100  
9 million. The Reorganized Debtor filed an appeal from the judgment on April 6, 2012, and this case  
10 was filed to allow the Reorganized Debtor to pursue that appeal to a final determination.

11 After months of negotiations between the Reorganized Debtor and the judgment creditor,  
12 the DEBTOR'S FIRST AMENDED CHAPTER 11 PLAN (the "Plan"),<sup>1</sup> was confirmed and the  
13 AMENDED ORDER CONFIRMING DEBTOR'S FIRST AMENDED CHAPTER 11 PLAN (the  
14 "Confirmation Order") was entered on April 29, 2013 as ECF Docket No. 107.<sup>2</sup> See, Zylstra  
15 Declaration at ¶ 2.

16 The Effective Date of the Plan was June 13, 2013. On that date, the Reorganized Debtor  
17 sent by wire transfer to the Plan Agent the sum of \$139,000.60 that represented all Estate Assets, as  
18 defined by the Plan, that were in the possession of the Reorganized Debtor. See, Otto Declaration  
19 at ¶ 4; Bicher Declaration at ¶ 2. On August 13, 2013, the escrow at West Coast Escrow for the  
20 sale of the residential real property located at 49355 Sunrose Lane, Palm Desert, California and  
21 defined in the Plan as the "Personal Residence" closed and the \$873,427.48 net proceeds of the sale  
22 were sent by wire transfer to the Plan Agent. See, Request for Judicial Notice, Exhibit 4; Bicher  
23 Declaration at ¶ 3.

24  
25  
26 <sup>1</sup> ECF Docket No. 69; See, Request for Judicial Notice, Exhibit 1.

27 <sup>2</sup> ECF Docket No. 107; See, Request for Judicial Notice, Exhibit 2.

1 The oral argument on the appeal was conducted on October 17, 2013, before the Court of  
2 Appeal of the State of California Fifth Appellate District. On October 29, 2013, the Court of  
3 Appeal filed its Opinion and identified it as "Not to Be Published In the Official Reports." See,  
4 Request for Judicial Notice, Exhibit 3; Otto Declaration at ¶ 3. The Court of Appeal affirmed the  
5 judgment and a postjudgment order for attorneys' fees and costs. See, Request for Judicial Notice,  
6 Exhibit 3.

7 The Plan Agent and the Reorganized Debtor have diligently proceeded with consummation  
8 of the Plan as follows:

9 A. The Class 1 secured claim of U.S. Bank: After confirmation of the Plan, the Debtor  
10 paid two (2) \$1,000.00 interest only payments to U.S. Bank as required by the Plan.  
11 On August 13, 2013, the claim of U.S. Bank was paid in full through the escrow at  
12 West Coast Escrow for the sale of the Personal Residence. See, Request for Judicial  
13 Notice Exhibit 4; Otto Declaration at ¶ 6.

14 B. The Class 2 secured claim of Riverside County Taxing Authority: On August 13,  
15 2013, the claim of the Riverside County Taxing Authority for unpaid real property  
16 taxes for the Personal Residence, if any, were paid in full through the escrow at  
17 West Coast Escrow for the sale of the Personal Residence. See, Request for Judicial  
18 Notice Exhibit 4; Otto Declaration at ¶ 7.

19 C. The Class 4 Administrative Convenience Class: On June 17, 2013, the Plan Agent  
20 made the following distributions in full satisfaction of all holders of Class 4  
21 Administrative Convenience Claims:

22	a. eCAST Settlement Corp	\$127.58
23	b. GE Capital Retain Bank	\$68.96
24	c. Dept Stores Natl Bank/Macy's	\$316.55
25	d. Rayne Water Conditioning	\$36.40
26	e. Time Warner Cable	\$179.26
27	f. Sparkletts (check returned)	\$17.39

1 See, Bicher Declaration at ¶ 5.

2 D. Reorganized Debtor's Claim of Homestead Exemption: On October 31, 2013, the  
3 Plan Agent made a distribution of \$175,000.00 by check no. 1034 to the  
4 Reorganized Debtor in full satisfaction of the claim of homestead exemption. See,  
5 Request for Judicial Notice, Exhibit 1; Bicher Declaration at ¶ 4.

6 E. The Class 3 General Unsecured Creditors: On December 13, 2013, the Plan Agent  
7 made the following distributions in partial satisfaction of all holders of Class 3  
8 Allowed General Unsecured Claims:

9 a. Vicken Massoyan, et al (Proof of Claim No. 5 for \$116,626,022.38):

10 \$795,200.00; and

11 b. Cobalt Investments, LLC et al (Proof of Claim No. 7 for \$700,000.00):

12 \$4,800.00.

13 See, Bicher Declaration at ¶ 6.

14 In furtherance of the consummation of its Plan, the Reorganized Debtor and the Plan Agent  
15 have paid in full the quarterly fees owed to the Office of the United States Trustee as follows:

16 1 Second Quarter 2013 paid by Plan Agent:

17 2 Third Quarter 2013 paid by Plan Agent:

18 3 Fourth Quarter 2013 to be paid by Plan Agent

19 4 First Quarter 2014 to be paid by Plan Agent

20 See, Bicher Declaration at ¶ 7.

21 Only minor matters remain to be resolved in this case. The entry of the Final Decree, the  
22 payment of final invoices for fees and costs of professionals, and the distribution of the remaining  
23 Estate Assets to the Class 3 creditors, Vicken Massoyan, et al and Cobalt Investments, LLC et al.  
24 There are no other distributions to be made under the Plan. The Reorganized Debtor does not need  
25 to continue the Chapter 11 case with the attendant expense of bankruptcy counsel and quarterly fees  
26 to the Office of the United States Trustee. The requirements under the Plan for the issuance of the  
27 discharge of debts incurred before confirmation of the Plan have been satisfied. See, Request for  
28

1 Judicial Notice, Exhibit 1, Section IV.A (Effect of Confirmation of Plan/Discharge). Inasmuch as  
2 the Plan has been substantially consummated, and in this case fully consummated, the Reorganized  
3 Debtor contends that issuance of the discharge of debts and entry of a final decree and Order  
4 closing the case is appropriate at this time. See, Zylstra Declaration at ¶ 3.

5 **II.**

6 **A FINAL DECREE IN THE REORGANIZED DEBTOR'S**

7 **CASE IS APPROPRIATE UNDER 11 U.S.C. §350(a)**

8 11 U.S.C. §350(a) sets forth when it is appropriate for the Court to close a pending  
9 bankruptcy case:

10 “(a) After an estate is fully administered and the court has discharged the trustee,  
11 the court shall close the case.”

12 Fed. R. Bankr. P. 3022 addresses the entry of a final decree in a Chapter 11 reorganization case:

13 “After an estate is fully administered in a chapter 11 reorganization case, the court,  
14 on its own motion or on motion of a party in interest, shall enter a final decree  
15 closing the case.”

16 The Reorganized Debtor’s case has been “fully administered.” The Plan Agent and the  
17 Reorganized Debtor have proceeded to consummate the Plan and creditors have been either paid in  
18 full or there remains one final minimal distribution of the remaining Estate Assets after payment of  
19 the fees and costs of professionals. Thus, a final decree and an order closing this case is  
20 appropriate at this time.

21 ///

22 ///

23

24

25

26

27

28

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

III.

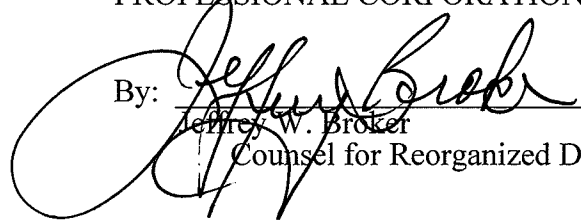
CONCLUSION

In view of the above-cited authorities, a Final Decree in this bankruptcy proceeding is appropriate. In the case at bar, the case has been fully administered, payments have been made as agreed, the requirements for issuance of the discharge of debts under Section 1141 have been satisfied, and the closing of the case is thereby mandated.

DATED: January 7, 2014

BROKER & ASSOCIATES  
PROFESSIONAL CORPORATION

By: \_\_\_\_\_



Jeffrey W. Broker  
Counsel for Reorganized Debtor

**DECLARATION OF KATHLEEN OTTO**

1 I, Kathleen Otto, declare and state as follows:

2 1. Oath. I am an adult over the age of 18 years. I the Reorganized Debtor in this  
3 Chapter 11 case (“Debtor”). The matters set forth herein are of my own personal knowledge and, if  
4 called upon, I could and would competently testify to their truth. I make this Declaration in support  
5 of the Motion of Reorganized Debtor For Final Decree and Order Closing Case (“Motion”).

6 2. Case Background. I filed this voluntary Chapter 11 case on May 10, 2012 (the  
7 “Petition Date”). I live in Palm Desert, California. I am a widow. My deceased spouse, John Otto,  
8 died on May 11, 2009.

9 3. Appeal of Judgment. I was named as a defendant in a class action which was filed  
10 against my deceased husband and his corporate entities. Despite a jury verdict in my favor, on  
11 March 5, 2012 the state court entered a judgment against me in excess of \$100 million. An appeal  
12 from the judgment was filed on April 6, 2012. The oral argument on the appeal was held on  
13 October 17, 2013, before the Court of Appeal of the State of California Fifth Appellate District.  
14 On October 29, 2013, the Court of Appeal filed it Opinion and identified it as “Not to Be Published  
15 In the Official Reports.” A true and correct copy of the Opinion is attached to the Request for  
16 Judicial Notice as Exhibit 3. By the Opinion, the Court of Appeal affirmed the judgment and a  
17 postjudgment order for attorneys’ fees and costs.

18 4. Transfer of Estate Assets to Plan Agent. On June 13, 2013, I sent by wire transfer to  
19 Robert Bicher, the Plan Agent under the Plan, the sum of \$139,000.60. The wire transfer  
20 represented all Estate Assets, as that term is defined by the Plan, that were in my possession.

21 5. Sale of Personal Residence. On August 13, 2013, the escrow at West Coast Escrow  
22 for the sale of my personal residence located at 49355 Sunrose Lane, Palm Desert, California and  
23 defined in the Plan as the “Personal Residence” closed. The net proceeds of the sale of  
24 \$873,427.48 were sent by wire transfer to the Plan Agent. A true and correct copy of the Seller’s  
25 Final Settlement Statement for the sale of the Personal Residence is attached as Exhibit 4 to the  
26 Request for Judicial Notice.  
27  
28





**DECLARATION OF PAMELA J. ZYLSTRA**

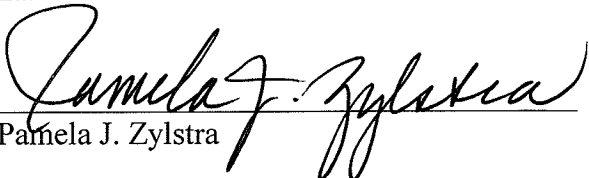
I, Pamela J. Zylstra, declare and state as follows:

1. Oath. The matters stated herein are true and correct and are within my personal knowledge, and if called upon to testify as a witness, I could and would testify competently thereto. I am an attorney at law, duly licensed to practice in the State of California and before the bar of this Court. I am Of Counsel to Broker & Associates Professional Corporation, the General Reorganization Counsel for the Reorganized Debtor in this case.

2. The Plan. After months of negotiations between the Reorganized Debtor and the judgment creditor, the DEBTOR'S FIRST AMENDED CHAPTER 11 PLAN (the "Plan"), was confirmed and the AMENDED ORDER CONFIRMING DEBTOR'S FIRST AMENDED CHAPTER 11 PLAN (the "Confirmation Order") was entered on April 29, 2013 as ECF Docket No. 107. The Effective Date of the Plan was June 13, 2013. A true and correct copy of the Plan is attached to the Request for Judicial Notice as Exhibit 1. A true and correct copy of the Confirmation Order is attached to the Request for Judicial Notice as Exhibit 2.

3. Remaining Matters. Only minor matters remain to be addressed in this case. The entry of the Final Decree, the payment of final invoices for fees and costs of professionals, the payment of quarterly fees, and the distribution of the remaining Estate Assets to the Class 3 creditors, Vicken Massoyan, et al and Cobalt Investments, LLC et al. There are no other distributions to be made under the Plan. The requirements under the Plan for the issuance of the discharge of debts incurred before confirmation of the Plan have been satisfied. The Reorganized Debtor does not need to continue the Chapter 11 case with the attendant expense of bankruptcy counsel and quarterly fees to the Office of the United States Trustee.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct and that this declaration was executed this 7<sup>th</sup> day of January 2014 at Irvine, California.

  
Pamela J. Zylstra

**DECLARATION OF ROBERT F. BICHER**

I, Robert F. Bicher, declare and state as follows:

1. Oath. The matters stated herein are true and correct and are within my personal knowledge, and if called upon to testify as a witness, I could and would testify competently thereto. I serve as the Plan Agent under the terms of the Plan, Section II.D.3.

2. Estate Assets. On June 13, 2013, I received a wire transfer from the Reorganized Debtor, Kathleen Otto, in the sum of \$139,000.60. The Reorganized Debtor represented that \$139,000.60 included all Estate Assets, as defined by the Plan, that were in the possession of the Reorganized Debtor.

3. Proceeds of Sale of Personal Residence. On July 19, 2013, I received a wire transfer from the escrow at West Coast Escrow that was handling the sale of the residential real property located at 49355 Sunrose Lane, Palm Desert, California and defined in the Plan as the "Personal Residence" in the amount of \$21,000.00 as an early distribution. On August 14, 2013, I received a wire transfer from the escrow at West Coast Escrow that handled the sale of the residential real property located at 49355 Sunrose Lane, Palm Desert, California and defined in the Plan as the "Personal Residence". The amount of the wire transfer was \$873,427.48 and represented the net proceeds of the sale of the Personal Residence according to the Seller's Final Settlement Statement. See, Exhibit 4 to the Request for Judicial Notice.

4. Debtor's Homestead Exemption. On October 31, 2013, I made a distribution of \$175,000.00 by check no. 1034 payable to the Reorganized Debtor in full satisfaction of her claim of homestead exemption.

5. Class 4 Creditors (Administrative Convenience). On June 17, 2013, the Plan Agent made the following distributions in partial satisfaction of all holders of Class 3 Allowed General Unsecured Claims:

a.	eCAST Settlement Corp	\$127.58
b.	GE Capital Retain Bank	\$68.96
c.	Dept Stores Natl Bank/Macy's	\$316.55

- 1 d. Rayne Water Conditioning \$36.40
- 2 e. Time Warner Cable \$179.26
- 3 f. Sparkletts (check returned) \$17.39

4 6. Class 3 Creditors. On December 13, 2013, I made the following distributions in  
5 partial satisfaction of all holders of Class 3 Allowed General Unsecured Claims:

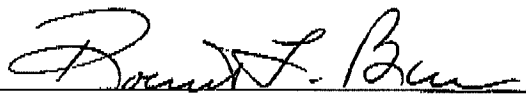
- 6 a. Vicken Massoyan, et al (Proof of Claim No. 5 for \$116,626,022.38):  
7 \$795,200.00; and
- 8 b. Cobalt Investments, LLC et al (Proof of Claim No. 7 for \$700,000.00):  
9 \$4,800.00.

10 7. Quarterly Fees. In furtherance of the consummation of the Plan, I have paid in full  
11 the quarterly fees owed to the Office of the United States Trustee as follows:

- 12 a. Second quarter 2013
- 13 b. Third quarter 2013
- 14 c. Fourth quarter 2013 – will be paid timely by my office
- 15 d. First quarter 2014 – will be paid timely by my office

16 8. Funds on Hand. The remaining funds on hand total approximately \$62,000.00. The  
17 funds will be used to make the final payments of quarterly fees for the fourth quarter of 2013 and  
18 the first quarter of 2014, and to pay professional fees and costs. The balance of funds remaining  
19 after payment of all costs and expenses of the estate will be distributed to the Class 3 creditors  
20 identified in paragraph 6 above and in the same proportion as set forth in paragraph 6.

21 I declare under penalty of perjury under the laws of the United States of America and the  
22 State of California that the foregoing is true and correct and that this declaration was executed this  
23 7<sup>th</sup> day of January 2014 at Redlands, California.

24   
25 Robert F. Bicher

### 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 18111 Von Karman, Suite 460, Irvine, CA 92612

A true and correct copy of the foregoing document entitled (*specify*): **MOTION OF REORGANIZED DEBTOR FOR FINAL DECREE AND ORDER CLOSING CASE; MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATIONS OF KATHLEEN OTTO, ROBERT F. BICHER, AND PAMELA J. ZYLSTRA IN SUPPORT THEREOF**

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 9, 2014, 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:

Jeffrey W Broker	<a href="mailto:jbroker@brokerlaw.biz">jbroker@brokerlaw.biz</a>	COUNSEL FOR REORGANIZED DEBTOR
Thomas T. Hwang	<a href="mailto:hwang.thomas@Dorsey.com">hwang.thomas@Dorsey.com</a>	Counsel for Creditor Massoyan et al
Martha E Romero	<a href="mailto:Romero@mromerolawfirm.com">Romero@mromerolawfirm.com</a>	COUNSEL FOR RIVERSIDE CTY:
Jason.K.Schrader	<a href="mailto:jason.K.Schrader@usdoj.gov">jason.K.Schrader@usdoj.gov</a>	United States Trustee
United States Trustee (RS)	<a href="mailto:ustpreion16.rs.ecf@usdoj.gov">ustpreion16.rs.ecf@usdoj.gov</a>	
Jaime L. Watkins	<a href="mailto:ecf@bass-associates.com">ecf@bass-associates.com</a>	Request for Courtesy Notice
Pamela Jan Zylstra	<a href="mailto:zylstralaw@gmail.com">zylstralaw@gmail.com</a>	Request for Courtesy Notice

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) January 9, 2014, 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.

Honorable Meredith Jury, 3420 Twelfth Street, Suite 325, Courtroom 301, Riverside, CA 92501-3819

See attached list of creditors

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*) January 9, 2014, 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.

**VIA EMAIL DELIVERY:**

Ara Jabaghourian <[ajabaghourian@cpmlegals.com](mailto:ajabaghourian@cpmlegals.com)>  
John Walshe Murray <[murray.john@dorsey.com](mailto:murray.john@dorsey.com)>  
Vadim Braslavsky, Esq., Herzfeld & Rubin, LLP, <[vbraslavsky@hrllp-law.com](mailto:vbraslavsky@hrllp-law.com)> (COBALT)

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 09, 2014  
*Date*

Myra Blunt  
*Printed Name*

\_\_\_\_\_  
*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 18111 Von Karman, Suite 460, Irvine, CA 92612

A true and correct copy of the foregoing document entitled (*specify*): **MOTION OF REORGANIZED DEBTOR FOR FINAL DECREE AND ORDER CLOSING CASE; MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATIONS OF KATHLEEN OTTO, ROBERT F. BICHER, AND PAMELA J. ZYLSTRA IN SUPPORT THEREOF**

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 9, 2014, 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:

Jeffrey W Broker	<a href="mailto:jbroker@brokerlaw.biz">jbroker@brokerlaw.biz</a>	COUNSEL FOR REORGANIZED DEBTOR
Thomas T. Hwang	<a href="mailto:hwang.thomas@dorsey.com">hwang.thomas@dorsey.com</a>	Counsel for Creditor Massoyan et al
Martha E Romero	<a href="mailto:Romero@mromerolawfirm.com">Romero@mromerolawfirm.com</a>	COUNSEL FOR RIVERSIDE CTY:
Jason.K.Schrader	<a href="mailto:jason.K.Schrader@usdoj.gov">jason.K.Schrader@usdoj.gov</a>	United States Trustee
United States Trustee (RS)	<a href="mailto:ustpreion16.rs.ecf@usdoj.gov">ustpreion16.rs.ecf@usdoj.gov</a>	
Jaime L. Watkins	<a href="mailto:ecf@bass-associates.com">ecf@bass-associates.com</a>	Request for Courtesy Notice
Pamela Jan Zylstra	<a href="mailto:zylstralaw@gmail.com">zylstralaw@gmail.com</a>	Request for Courtesy Notice

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) January 9, 2014, 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.

Honorable Meredith Jury, NOT SERVED (Court Manual Appendix F Exception to LBR 5005-2(d))  
Jason Schrader, 3801 University Ave, Suite 720, Riverside, CA 92501

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*) January 9, 2014, 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.

**VIA EMAIL DELIVERY:**

Ara Jabaghourian <[ajabagchourian@cpmlegals.com](mailto:ajabagchourian@cpmlegals.com)>  
John Walshe Murray <[murray.john@dorsey.com](mailto:murray.john@dorsey.com)>  
Vadim Braslavsky, Esq., Herzfeld & Ruben, LLP, <[vbraslavsky@hrlp-law.com](mailto:vbraslavsky@hrlp-law.com)> (COBALT)

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 09, 2014

Myra Blunt

Date

Printed Name

Signature

