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7 for Namco Capital Group, Inc.

8 **UNITED STATES BANKRUPTCY COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **LOS ANGELES DIVISION**

11
12 In re:
13
14 NAMCO CAPITAL GROUP, INC., a California
corporation,
15
16 Debtor.

Case Number.: 2:08-bk-32333-BR

Chapter 11

**NOTICE OF HEARING ON MOTION OF
CHAPTER 11 TRUSTEE BRADLEY D.
SHARP, CHAPTER 11 TRUSTEE FOR
THE ESTATE OF NAMCO CAPITAL
GROUP, INC. FOR ORDER APPROVING
PROCEDURES IN CONNECTION WITH
PROPOSED SALE OF PROPERTY OF
THE ESTATE [1929 PICO BLVD.]**

Hearing:

Date: December 29, 2009
Time: 2:00 p.m.
Judge: Courtroom 1668
255 East Temple Street
Los Angeles, CA 90012

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25 **TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY JUDGE,**
26 **AND INTERESTED PARTIES:**
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JMBM
Jeffer Mangels
Butler & Marmaro LLP

1 **PLEASE TAKE NOTICE** that on December 29, 2009 at 2:00 p.m., or as soon thereafter as
2 the matter can be heard, before the Honorable Barry Russell, United States Bankruptcy Judge, in
3 Courtroom 1668, located at 255 East Temple Street, Los Angeles, CA, the Bankruptcy Court will
4 consider the *Motion of Bradley D. Sharp (the "Trustee")*, Chapter 11 Trustee for the Estate of
5 *Namco Capital Group, Inc. ("Debtor" or "Namco") for an Order Approving Procedures in*
6 *Connection with Proposed Sale of Property of the Estate (the "Motion")*, filed on December 16,
7 2009 (Doc. No. 654). The purpose of the Motion is to establish Court-approved bid/sale procedures
8 for the sale of estate property described below. A copy of the Motion was served upon you through
9 the ECF system on December 16, 2009.*

10 Subject to the approval of this Court, AJ Industrial Properties, LLC, has agreed to purchase
11 property of Debtor's estate consisting of that certain real property commonly known as 1929 Pico
12 Boulevard, Los Angeles, California (the "Property") from the Trustee, free and clear of all liens,
13 claims, interests and encumbrances. The purchase price for the Property is \$3,100,000.00, pursuant
14 to the terms and conditions of that certain *Standard Offer, Agreement and Escrow Instructions for*
15 *Purchase of Real Estate*, dated November 24, 2009, (the "Sale Agreement"). A copy of the Sale
16 Agreement is appended to the Motion as Exhibit "A" to the Declaration of Bradley D. Sharp
17 ("Sharp Decl.").

18 Effective as of September 1, 2009, the Trustee has employed, with Court approval, Lee &
19 Associates, Los Angeles West, Inc. ("Broker") as commercial real estate brokers, to market the
20 Property for sale. The Trustee and his professionals have contacted numerous potential buyers and
21 have provided various types of due diligence information to such parties and the Trustee and Broker
22 have encouraged potential overbidders to submit bids.

23 The Motion is based upon this notice of motion, the Motion itself, the Sharp Decl., the
24 pleadings and records on file in this case, and upon such other evidentiary matters as may be
25 presented to the Court regarding the Motion.

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27 _____
* You should refer to the Motion in its entirety to evaluate the relief requested therein.

1 **PLEASE TAKE FURTHER NOTICE** that oppositions to the Motion, if any, must be filed
2 and served on or before December 23, 2009. A file-stamped copy of any such opposition must be
3 delivered to Judge Russell's chambers by December 23, 2009 at 3:00 p.m. The failure to file and
4 serve timely a response to the Motion may be deemed by the Court to be consent to the granting of
5 the Motion. For further information concerning the Motion, please contact the attorneys for the
6 Trustee listed on the first page of this notice.

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8 Date: December 18, 2009

JEFFER, MANGELS, BUTLER & MARMARO LLP

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By: /s/ David M. Poitras
DAVID M. POITRAS P.C.
Counsel for Bradley D. Sharp,
Chapter 11 Trustee for Namco Capital Group, Inc.

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Butler & Marmaro LLP

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:

1900 Avenue of the Stars, Seventh Floor, Los Angeles, CA 90067-4308

The foregoing document described NOTICE OF HEARING ON MOTION OF CHAPTER 11 TRUSTEE BRADLEY D. SHARP, CHAPTER 11 TRUSTEE FOR THE ESTATE OF NAMCO CAPITAL GROUP, INC. FOR ORDER APPROVING PROCEDURES IN CONNECTION WITH PROPOSED SALE OF PROPERTY OF THE ESTATE 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 indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On December 18, 2009, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served): On December 18, 2009, I served the following person(s) and/or entity(ies) at the last known address(es) 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/or with an overnight mail service 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.*

[Served By Overnight Mail]
Honorable Barry Russell
United States Bankruptcy Court
255 E. Temple St., Suite 1660
Los Angeles, CA 90012

Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on December 18, 2009, I served the following person(s) and/or entity(ies) by personal delivery, 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 the judge will be completed no later than 24 hours after the document is filed.*

Email: Ronald Michelman ronaldmichelman@sbcglobal.net

Service information continued on attached page

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

December 18, 2009 Claudean Brandon

Date Type Name



JMBM
Jeffer Mangels
Butler & Marmaro LLP

1 **ADDITIONAL SERVICE INFORMATION**

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