

1 ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP
 2 DAVID R. ZARO (BAR NO. 124334)
 TIM C. HSU (BAR NO. 279208)
 3 865 South Figueroa Street, Suite 2800
 Los Angeles, California 90017-2543
 4 Phone: (213) 622-5555
 Fax: (213) 620-8816
 5 E-Mail: dzaro@allenmatkins.com
 thsu@allenmatkins.com

6 ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP
 7 EDWARD G. FATES (BAR NO. 227809)
 8 One America Plaza
 600 West Broadway, 27th Floor
 9 San Diego, California 92101-0903
 Phone: (619) 233-1155
 10 Fax: (619) 233-1158
 E-Mail: tfates@allenmatkins.com

11 Attorneys for Receiver
 12 Thomas A. Seaman

13
 14 **UNITED STATES DISTRICT COURT**
 15 **CENTRAL DISTRICT OF CALIFORNIA**
 16 **WESTERN DIVISION**

17 SECURITIES AND EXCHANGE
 COMMISSION,
 18 Plaintiff,
 19 v.
 20 STEVE CHEN, USFIA, INC.,
 ALLIANCE FINANCIAL
 21 GROUP, INC., AMAUCTION, INC.,
 ABORELL MGMT I, LLC, ABORELL
 22 ADVISORS I, LLC, ABORELL
 REIT II, LLC, AHOME REAL
 23 ESTATE, LLC, ALLIANCE
 24 NGN, INC., APOLLO REIT I, INC.,
 APOLLO REIT II, LLC, AMKEY, INC.,
 25 US CHINA CONSULTATION
 ASSOCIATION, and QUAIL RANCH
 26 GOLF COURSE, LLC,
 27 Defendants.

Case No. 2:15-cv-07425 RGK PLA

**NOTICE OF RECEIPT OF
 QUALIFIED OVERBID FOR
 MOTION FOR (A) APPROVAL OF
 SALE OF COMMERCIAL REAL
 PROPERTY (LIVE OAK
 PROPERTY), AND (B) AUTHORITY
 TO PAY BROKER’S COMMISSION
 (DKT. NO. 339)**

Date: November 5, 2018
 Time: 9:00 a.m.
 Ctrm.: 850
 Judge: Hon. R. Gary Klausner

28

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR**
2 **COUNSEL OF RECORD:**

3 **PLEASE TAKE NOTICE** that Thomas A. Seaman ("Receiver"), the Court-
4 appointed permanent receiver for Defendants USFIA, Inc., Alliance Financial
5 Group, Inc., Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC,
6 Aborell REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo
7 REIT I, Inc., Apollo REIT II, LLC, Amkey, Inc., US China Consultation
8 Association, Quail Ranch Golf Course, LLC, and their subsidiaries and affiliates,
9 hereby submits this Notice of Receipt of Qualified Overbid to provide notice to this
10 Court and all parties that a qualified overbid has been received in connection with the
11 Receiver's proposed sale of the commercial real property located at and commonly
12 known as the Live Oak Property.

13 In the Receiver's Motion for (A) Approval of Sale of Commercial Real
14 Property (Live Oak Property), and (B) Authority to Pay Broker's Commission (the
15 "Live Oak Property Sale Motion"), which seeks approval of the proposed sale of the
16 Live Oak Property, the Receiver proposed a deadline for submission of qualified
17 overbids by no later than 3:00 p.m. PST on October 26, 2018 ("Overbid Deadline").

18 Since the Live Oak Property Sale Motion was filed, and as proposed therein,
19 the Receiver has published notice of the proposed sale and the overbid deadline once
20 a week for four weeks in the San Gabriel Valley Tribune in compliance with the
21 requirements for a public auction pursuant to 28 U.S.C. § 2001(a), and has further
22 provided notice of the proposed sale and Overbid Deadline to all prospective
23 purchasers and other such would-be interested parties.

24 As a result of these efforts, a qualified overbid was received prior to the
25 Overbid Deadline. Moreover, the existing buyer has indicated it intends to bid
26 further. The Receiver therefore intends to conduct an auction at the Live Oak
27 Property at 11:00 a.m. on November 5, 2018. At the conclusion of the auction, the
28

1 Receiver will report to the Court regarding the highest bid and submit an amended
2 proposed order approving the sale to the highest bidder.

4 Dated: October 29, 2018

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Edward Fates

EDWARD G. FATES
Attorneys for Receiver
Thomas A. Seaman

- 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

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