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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re)
)
TWIFORD ENTERPRISES, INC.,) Case No. 18-20120
) CHAPTER 11
Debtor-in-Possession.)
)

MOTION FOR APPROVAL OF SALE OF CATTLE

COMES NOW the above named Debtor, by and through his counsel, and pursuant to 11 U.S.C. §§ 363 and 1107, and F.R.B.P. 6004(c), hereby seeks authorization to sell by private sale to Sharp Ranch Trust no less than 50 head and up to 100 head of cattle (“Cattle”), for the purchase price of \$1,680.00 per head under the terms set forth in the Bred Heifer Contract (“Contract”) attached hereto as Exhibit “A”, and in support hereof show the Court as follows:

1. TEI filed for relief under Chapter 11 of the Bankruptcy Code on March 7, 2018, and acts as a debtor-in-possession under 11 U.S.C. §§ 1107 and 1108.
2. The Cattle are subject to cross-collateralized liens held by Rolling Hills Bank and Trust, which balances totaled as of the petition date was \$ 5,797,103.29 and agisters’ liens filed by Petsch Farms, LLC in the amount of at least \$245,409.49.
3. The sale of the Cattle are necessary for the reorganization of Debtor’s financial affairs as shown by the budget attached to the Court’s *Order Approving Extension of Use of Cash Collateral*.

BRED HEIFER CONTRACT

BUYER: Sharp Ranch Trust
Dan Sharp
HC 1 Box 83
Boise City, OK 73933
580-516-1600
580-426-2710
dcsharp@pranch@gmail.com

SELLER: Twiford Enterprises, Inc.
Debtor-in-Possession
640 Horseshoe Creek Road
Glendo, WY 82213
307-735-4391
jacktwiford@yahoo.com

HEAD: No less than 50 head up to 100 head
PRICE: \$1,680.00 per head
ADJUSTMENTS: N/A
SALE PRICE: \$1,680.00 per head, 10% down payment due at execution of contract.
DELIVERY: 10th to 15th October
FREIGHT: Buyer will pay the truckers at the time of deliver.
VACCINATIONS: Bangs Vacc, Prebreeding and booster, Poured, Scour Bos 9, PI Free
COMMENTS: All heifers will have been ultrasounded by Twiford for fetal age and health. Twiford will brand and tag the heifers before loading at Sharp's own risk.

PAYABLE TO: Twiford Enterprises, Inc., Debtor-in-Possession
640 Horseshoe Creek Road
Glendo, WY 82213

All cattle shall be Bangs Vaccinated and PI Negative by Twiford. They shall be sound and in merchantable condition. This Contract is subject to Bankruptcy Court approval.

IN WITNESS WHEREOF, the parties to this Contract have set their hands and seals to be effective as of its execution by both Seller and Buyer.

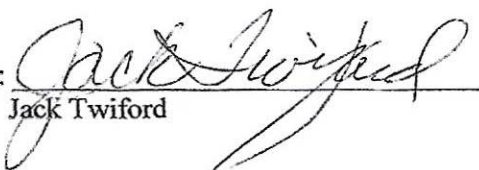
SELLER:

BUYER:

Twiford Enterprises, Inc.

Sharp Ranch Trust

By:


Jack Twiford

By:



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**NOTICE OF OPPORTUNITY TO OBJECT TO DEBTOR’S MOTION FOR
APPROVAL OF SALE**

YOU ARE HEREBY NOTIFIED that the Debtor has filed its “Motion for Approval of Sale” (“Motion”) wherein Debtor seeks authorization pursuant to 11 U.S.C. §§ 363 and 1107, and F.R.B.P. 6004(c), to sell by private sale to Sharp Ranch Trust, no less than 50 head and up to 100 head of cattle, for the purchase price of \$1,680.00 per head, under the terms set forth in the Bred Heifer Contract attached to said Motion.

Pursuant to Rule 2002-1 of the Local Rules of Bankruptcy Procedure, if you desire to oppose this Motion filed with the Court on behalf of Debtor, you are required to file with the Court and serve on Stephen R. Winship, attorney for the Movant, whose address is shown above, a written objection to the motion on or before **October 29, 2018**, or the relief requested may be granted by the Court.

DATED this 3rd day of October, 2018.

TWIFORD ENTERPRISES, INC.

Label Matrix for local noticing
1089-2
Case 18-20120

Ag Direct
5015 South 118th Street
Omaha, NE 68137-2210

Brown Winick
666 Grand Ave, Suite 2000
Des Moines, IA 50309-2510

Donahue Ruthledge
4735 Road 234
Cheyenne, WY 82009-9223

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

John Twiford
215 Ponderosa Trail
Cheyenne, WY 82009-1621

Jorgensen Land & Cattle
31250 265th Street
Ideal, SD 57541-6715

Key Bar Ranch
3900 S Tebler Street
Lakewood, CO 80235-2213

Patricia Twiford
8345 West 71st Ave
Arvada, CO 80004-1836

Petsch Farm & Ranch
5380 Road 238
Meriden, WY 82081

Petsch Farm & Ranch dba Y6 Feeders
5380 Road 238
Meriden, WY 82081

Platte County Treasurer
806 9th St
Wheatland, WY 82201-2999

R-Mill Iron Land and Cattle Ranch
3388 Road 162
Albin, WY 82050

Thomas Twiford
1870 County Road 109
Cheyenne, WY 82009