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7 Attorneys for Debtor and Debtor-in-Possession

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

11 In re

Case No. 8:17-bk-11996-SC

12 WJA ASSET MANAGEMENT, LLC,

Chapter 11

13 Debtor and  
14 Debtor-in-Possession.

(Jointly Administered with Case Nos.  
8:17-bk-11997-SC; 8:17-bk-11998-SC;  
8:17-bk-11999-SC; 8:17-bk-12000-SC;  
8:17-bk-12001-SC; 8:17-bk-12002-SC;  
8:17-bk-12003-SC; 8:17-bk-12004-SC;  
8:17-bk-12005-SC; 8:17-bk-12006-SC;  
8:17-bk-12008-SC; 8:17-bk-12009-SC;  
8:17-bk-12010-SC; 8:17-bk-12011-SC;  
8:17-bk-12012-SC; 8:17-bk-12013-SC;  
8:17-bk-12014-SC; 8:17-bk-12015-SC;  
8:17-bk-12016-SC; 8:17-bk-12018-SC;  
8:17-bk-12019-SC; 8:17-bk-12124-SC;  
8:17-bk-12125-SC; 8:17-bk-12126-SC;  
8:17-bk-12127-SC and 8:17-bk-12285-SC)

- 15  Affects 5827 WINLAND HILLS DRIVE DEVELOPMENT FUND, LLC
- 16  Affects ALABAMA HOUSING FUND, LLC
- 17  Affects CA EXPRESS FUND, LLC
- 18  Affects CA SEE JANE GO FUND, LLC
- 19  Affects CA WHIRL FUND, LLC
- 20  Affects CLAIRTON RESIDENTIAL RENEWAL, LLC
- 21  Affects EQUITY INDEXED MANAGED FUND, LLC
- 22  Affects LUXURY ASSET PURCHASING INTERNATIONAL, LLC
- 23  Affects LVNV MULTI FAMILY LLC
- 24  Affects PMB MANAGED FUND, LLC
- 25  Affects PROSPER MANAGED FUND, LLC
- 26  Affects TD OPPORTUNITY FUND, LLC
- 27  Affects TD OPPORTUNITY FUND, LLC
- 28  Affects TD OPPORTUNITY FUND, LLC

**MOTION TO EXTEND EXCLUSIVITY PERIODS PURSUANT TO 11 U.S.C. § 1121(d); MEMORANDUM OF POINTS AND AUTHORITIES; AND DECLARATION OF HOWARD GROBSTEIN IN SUPPORT**

**[No hearing required pursuant to Local Bankruptcy Rule 9013-1(o)]**

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- 1  Affects TD REO FUND, LLC
- 2  Affects URBAN PRODUCE FUND, LLC
- 3  Affects WHIRL FUND, LLC
- 4  Affects WJA EXPRESS FUND, LLC
- 5  Affects WJA REAL ESTATE OPPORTUNITY FUND I, LLC
- 6  Affects WJA REAL ESTATE OPPORTUNITY FUND II, LLC
- 7  Affects WJA SECURE REAL ESTATE FUND, LLC
- 8  Affects WJA SECURE INCOME FUND, LLC
- 9  Affects WILLIAM JORDAN INVESTMENTS, INC.
- 10  Affects CA REAL ESTATE OPPORTUNITY FUND I, LLC
- 11  Affects CA REAL ESTATE OPPORTUNITY FUND II, LLC
- 12  Affects CALIFORNIA INDEXED GROWTH FUND, LLC
- 13  Affects SECURE CALIFORNIA INCOME FUND, LLC
- 14  Affects CA REAL ESTATE OPPORTUNITY FUND III, LLC
- 15  Affects CA REAL ESTATE OPPORTUNITY FUND III, LLC
- 16  Affects CA REAL ESTATE OPPORTUNITY FUND III, LLC
- 17  Affects All Debtors

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**TO THE HONORABLE SCOTT CLARKSON, UNITED STATES BANKRUPTCY JUDGE:**

WJA Asset Management, LLC, and the other affected debtors in the above-captioned cases (collectively, the "Debtors") hereby submit this *Motion to Extend Exclusivity Periods Pursuant to 11 U.S.C. § 1121(d)* (the "Motion"). In support of the Motion, the Debtors submit the following memorandum of points and authorities, and the declaration of Howard Grobstein, the chief restructuring officer ("CRO") of the Debtors.

1 **I. INTRODUCTION**

2 By this Motion, the Debtors request an order extending the deadlines to file plans  
3 of reorganization and to solicit acceptances thereof by approximately five months each.  
4 The CRO and his team need additional time to complete the reconciliation of the Debtors'  
5 books and records before they can formulate, propose, and negotiate plans of  
6 reorganization. In light of this work and the good-faith progress towards reorganization  
7 that the Debtors have exhibited thus far, the Debtors deserve an opportunity to  
8 exclusively file plans and solicit acceptances thereof. Accordingly, the Debtors request  
9 extensions of the deadlines to file plans of reorganization and to solicit acceptances  
10 thereof as set forth below.

11  
12 **II. BACKGROUND**

13 The above-captioned cases involve twenty-seven debtors. On May 18, 2017,  
14 twenty-two of the Debtors filed voluntary chapter 11 petitions. On May 25, 2017, four of  
15 the Debtors filed voluntary chapter 11 petitions. On June 6, 2017, one last Debtor filed a  
16 voluntary chapter 11 petition. The Debtors continue to operate their businesses and  
17 manage their affairs as debtors-in-possession with the CRO at their helm.

18 The Debtors are part of a network of entities or "Funds" that were formed to offer a  
19 range of investment opportunities to clients. WJA Asset Management, LLC ("WJAAM"),  
20 is the manager for all of the Debtors with the exception of itself and William Jordan  
21 Investments, Inc. ("WJI"). WJI was a registered investment advisor. Certain Funds, *i.e.*,  
22 those invested in private trust deeds secured by real estate, suffered losses. These  
23 cases were commenced to liquidate the Debtors' holdings in an orderly fashion to  
24 maximize the return for creditors and investors and to distribute the proceeds in a manner  
25 consistent with the Bankruptcy Code's priority scheme.

26 Pursuant to the Order Granting Motion to Extend Exclusivity Periods Pursuant to  
27 11 U.S.C. § 1121(d) [Docket No. 227], each Debtor currently has until January 18, 2018  
28 to exclusively file a chapter 11 plan pursuant to 11 U.S.C. § 1121(c)(2) and until April 18,

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1 2018 to exclusively solicit acceptances to a chapter 11 plan pursuant to 11 U.S.C. §  
2 1121(c)(3).

3  
4 **III. THE REQUESTED RELIEF**

5 Pursuant to § 1121(d), the Debtors respectfully request that the exclusivity period  
6 pursuant to § 1121(c)(2) be extended for approximately five months for all Debtors  
7 through and including June 18, 2018, and that the exclusivity period pursuant to  
8 § 1121(c)(3) be extended for all Debtors for approximately five months through and  
9 including September 18, 2018.

10  
11 **IV. CAUSE EXISTS TO GRANT AN EXTENSION OF THE EXCLUSIVITY PERIODS**

12 A chapter 11 debtor has the exclusive right to file a plan during the first 120 days  
13 of a bankruptcy case and to obtain acceptance of its plan during the first 180 days of the  
14 case. See 11 U.S.C. § 1121. Section 1121 is critical to the chapter 11 process,  
15 promoting the orderly and consensual reorganization of the debtor's affairs. Congress  
16 intended that the debtor be afforded a reasonable opportunity to negotiate and propose a  
17 consensual plan of reorganization without interference from creditors or the threat of a  
18 competing plan. See *In re Clamp-All Corp.*, 233 B.R. 198, 207 (Bankr. D. Mass. 1999);  
19 see also *In re Texaco, Inc.*, 81 B.R. 806, 809 (Bankr. S.D.N.Y. 1988) (citing H.R. Rep.  
20 No. 595, 95th Cong., 2d Sess. 221-22, reprinted in 1978 U.S.C.C.A.N. 5787).

21 A bankruptcy court can increase the exclusivity periods for "cause." "Cause" is not  
22 defined by the Bankruptcy Code. Nonetheless, in determining whether to extend the  
23 exclusivity periods, courts typically consider the following non-exhaustive list of nine  
24 factors:

- 25 1. The size and complexity of the case;
- 26 2. The necessity of sufficient time to permit the debtor to negotiate a plan of  
27 reorganization and prepare adequate information;
- 28 3. The existence of good faith progress toward reorganization;

- 1 4. The fact that the debtor is paying its bills as they become due;
- 2 5. Whether the debtor has demonstrated reasonable prospects for filing a
- 3 viable plan;
- 4 6. Whether the debtor has made progress in negotiations with its creditors;
- 5 7. The amount of time which has elapsed in the case;
- 6 8. Whether the debtor is seeking an extension of exclusivity in order to
- 7 pressure creditors to submit to the debtor's reorganization demands; and
- 8 9. Whether an unresolved contingency exists.

9 *In re Dow Corning Corporation*, 208 B.R. 661, 664-65 (Bankr. E.D. Mich. 1997)  
10 (cited with approval in *In re Henry Mayo Newhall Memorial Hospital*, 282 B.R. 444, 452  
11 (B.A.P. 9th Cir. 2002)); *In re Adelfia Communications Corp.*, 352 B.R. 578, 587 (Bankr.  
12 S.D.N.Y. 2006); *In the Matter of Friedman's, Inc.*, 336 B.R. 884, 888 (Bankr. S.D. Ga.  
13 2005).

14 These nine factors are simply a starting point; the debtor need not satisfy every  
15 single factor, and courts are free to consider other relevant factors based on the unique  
16 facts of the case. See *In re Adelfia Communications Corp.*, 352 B.R. at 583, 587. The  
17 transcendent consideration is "whether adjustment of exclusivity will facilitate moving the  
18 case toward a fair and equitable resolution." See *Henry Mayo Newhall Memorial*  
19 *Hospital*, 282 B.R. at 453. The decision of whether to grant a request to extend the  
20 exclusivity deadlines lies within the sound discretion of the bankruptcy court. See *In re*  
21 *Gibson & Cushman*, 101 B.R. 405, 409 (E.D.N.Y. 1989).

22 Here, cause exists to grant the extension of the Debtors' exclusivity periods. A  
23 discussion of the pertinent factors overwhelmingly supports granting the Motion.

24 **A. The Debtors' Cases Are Complex**

25 The Debtors' twenty-seven cases are complex. The CRO and his team need  
26 additional time to complete the reconciliation of the Debtors' books and records, which  
27 were inaccurate and incomplete in many material respects. This reconciliation includes  
28 the following necessary work: (a) analysis of the Debtors' QuickBooks files and

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1 information maintained by third-party custodians; (b) analysis of the Debtors' banking  
2 information; (c) analysis and documentation of all intercompany transfers and verification  
3 of the funds transferred between the Debtors; (d) determination of distributions to  
4 creditors and equity holders and investments made; (e) determination of the nature of  
5 ownership interests in certain Debtors held by other Debtors; and (f) determination of the  
6 classification of creditors and investors.

7 The analysis of intercompany transfers is particularly complex. The CRO  
8 uncovered situations where it appears that a debt incurred by one Debtor was "moved" to  
9 another Debtor without a readily apparent justification and contrary to proper accounting  
10 principles. There are multiple instances where, according to the Debtors' records in  
11 QuickBooks, a noteholder is a creditor of only one Debtor, but a different Debtor is the  
12 obligor on the subject promissory note and actually received the funds. To complicate  
13 matters further, in certain situations, interest and principal payments to the noteholder  
14 were made by the Debtor who booked the debt and not the promissory note obligor. Due  
15 to these complexities and the volume of intercompany transfers, the reconciliation is  
16 ongoing and requires additional time.

17 **B. The Debtors Need Sufficient Time to Negotiate a Plan of**  
18 **Reorganization and Prepare Adequate Information**

19 As discussed above, the CRO and his team need additional time to complete the  
20 reconciliation of the Debtors' books and records before they can formulate a plan of  
21 reorganization. Due to the volume of intercompany transfers, the CRO's analysis of the  
22 intercompany transfers is ongoing and requires additional time. Once the CRO's  
23 analyses are complete, the CRO expects to amend the Debtors' bankruptcy schedules,  
24 commence the claims filing process, and be in a position to discuss the terms of a plan  
25 (or plans, as the case may be) with the Committee.

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1           **C. The Debtors Have Exhibited Good-Faith Progress Towards**  
2           **Reorganization**

3           The Debtors have diligently moved forward towards confirmation in good faith.  
4           The Debtors commenced these cases to liquidate the Debtors' assets and close out the  
5           Funds in an orderly fashion in order to maximize the return for creditors and investors.  
6           The Debtors have taken a number of steps to achieve this goal, including obtaining  
7           authority to implement sale procedures that reduce the associated administrative  
8           overhead, and consummating several sales and transactions thereunder.

9           Since the Debtors filed their first Motion to Extend Exclusivity on September 15,  
10          2017, the Debtors have obtained Court authority to consummate 12 REO sales, 3 short  
11          payoff settlements, 1 foreclosure sale, 1 cash for keys deal, 3 mortgage loan sale  
12          agreements, and 2 deeds in lieu of foreclosure. In addition, the Debtors have held  
13          negotiations to monetize a number of the Debtors' assets, including the following: WJA  
14          Express Fund, LLC's 50% partnership interest in Gothard Express Partners, L.P.; WJA  
15          Real Estate Opportunity Fund II, LLC's 90% membership interest in CSO Opportunity  
16          Fund VII, LLC; Clairton Residential Renewal, LLC's ownership of four apartment  
17          buildings in Clairton, Pennsylvania; LVNV Multi Family LLC and WJA Real Estate  
18          Opportunity Fund II, LLC's partnership interests in Alpha Wave Residential Fund I, LP;  
19          TD REO's secured note against Smokiam RV Resort; TD Opportunity Fund, LLC's real  
20          property interest in Baytown, Texas and claims against third parties; and Luxury Asset  
21          Purchasing International, LLC's real property in Rancho Santa Fe, California. The Court  
22          recently approved bid procedures for the sale of WJA Express Fund, LLC's 50%  
23          partnership interest in Gothard Express Partners, L.P. and WJA Real Estate Opportunity  
24          Fund II, LLC's 90% membership interest in CSO Opportunity Fund VII and sale hearings  
25          thereon are set in the next few weeks.

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1 During this time, the Debtors have also continued to reduce costs. The CRO has  
2 eliminated all rental obligations by moving the Debtors' remaining operations and  
3 employees into Grobstein Teeple's offices where the Debtors do not pay rent. The CRO  
4 has also eliminated payroll costs by cutting the number of the Debtors' employees down  
5 to two.

6 Moreover, the Debtors have also made significant efforts to provide interested  
7 parties with accurate, timely, and transparent information. The CRO has conducted  
8 numerous in-person meetings and teleconferences with concerned creditors and  
9 investors wherein the CRO has provided a forum to ask questions and express concerns.  
10 Additionally, the CRO has provided regular written communications to investors and  
11 creditors with significant updates on the progress of these cases, and established a portal  
12 that allows interested parties to access useful information for free, including a notice of  
13 change of address form, a blank proof of claim form, pleadings, bankruptcy petitions and  
14 monthly operating reports. Further, the Debtors have received Court authority to  
15 implement certain claim and interest procedures that will allow the CRO's team to assist  
16 creditors and investors with completing proofs of claim and interest.

17 Thus, everything the Debtors have done in these cases has been done in a good-  
18 faith effort to progress towards reorganization.

19 **D. The Debtors are Paying Their Bills as They Become Due**

20 The Debtors are generally current on paying ordinary course of business  
21 undisputed administrative expenses. The Debtors are also current on all post-petition  
22 U.S. Trustee fees.

23 **E. The Debtors Have Exhibited Reasonable Prospects for Filing Viable**  
24 **Plans**

25 After conclusion of the reconciliation and other necessary work being done by the  
26 CRO and his team, the Debtors should be able to propose viable plans. The plans are  
27 expected to be liquidating plans that will result in distributions in accordance with the  
28 priority scheme set forth in the Bankruptcy Code.



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1           **F. The Debtors Will Make Progress in Negotiations With Their Creditors**  
2           **and Investors**

3           The Debtors will be in a position to make progress in negotiations with their  
4 creditors and investors once they complete the reconciliation. The Debtors have  
5 maintained regular communications with creditors and investors during this case and  
6 expect to continue to maintain the same level of dialogue when the Debtors are prepared  
7 to formulate their plans.

8           **G. A Significant Amount of Time Has Not Elapsed in These Cases**

9           Approximately eight months have passed since the commencement of these  
10 cases, which is a short amount of time relative to the complexities of these cases. Any  
11 alleged delay in these cases is attributable to the state of the Debtors' books and records  
12 prior to the CRO's involvement, and the other necessary post-petition work performed by  
13 the CRO and his team. Nevertheless, as detailed above, the Debtors have made  
14 significant progress towards reorganization in this short time and will continue to move  
15 diligently towards a successful reorganization without delay.

16           **H. The Debtors Are Not Seeking an Extension of Exclusivity In Order to**  
17           **Pressure Creditors and Investors to Submit to the Debtors'**  
18           **Reorganization Demands**

19           The Debtors are not using exclusivity as a tactical device to force creditors and  
20 investors to submit to the Debtors' reorganization demands. The Debtors intend to  
21 propose plans that enable the Debtors to continue to liquidate their assets in order to  
22 maximize value for creditors and investors. However, the amount that is distributed and  
23 how the distributions are shared depends on the reconciliation of the Debtors' books and  
24 records. The Debtors are requesting an extension of the exclusivity deadlines in order to  
25 finish the reconciliation, amend their schedules, commence the claims filing process, and  
26 perform other necessary work so they can negotiate a consensual resolution with  
27 creditors and investors.

28

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1           **I. Unresolved Contingencies Exist**

2           The CRO and his team must analyze and account for issues regarding the amount  
3 of investments, net of returns, that each investor received, the support for inter-company  
4 loans and/or investments, the support for creditors' claims versus investments and a  
5 myriad of other issues. These issues cannot be resolved, and plans cannot be proposed,  
6 before the CRO and his team complete the reconciliation.

7           Nonetheless, as discussed above, the Debtors have been and will continue to be  
8 extremely diligent in moving these cases forward towards plan confirmation. Given the  
9 complexities of these cases and the good-faith progress made thus far, the Debtors  
10 deserve an opportunity to exclusively file plans and solicit acceptances thereof.  
11 Accordingly, based upon the foregoing, the Debtors submit that cause exists to grant this  
12 Motion and extend the exclusivity periods to file plans and solicit acceptances thereof as  
13 set forth in Section III of the Motion.

14  
15           **V. CONCLUSION**

16           Based upon the foregoing, the Debtors respectfully request that the Court enter an  
17 order:

- 18           1. Granting this Motion;
- 19           2. For each Debtor, extending the exclusive period to file a chapter 11 plan  
20 pursuant to 11 U.S.C. § 1121(c)(2) to June 18, 2018;
- 21           3. For each Debtor, extending the exclusive period to solicit acceptances to  
22 such a plan pursuant to 11 U.S.C. § 1121(c)(3) to September 18, 2018;
- 23           4. Providing that the order is without prejudice to the Debtors' rights to seek  
24 further extensions of the exclusivity periods; and

25 ///  
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1 5. Granting such other and further relief as the Court may deem just and  
2 appropriate.

3  
4 DATED: January 18, 2018 SMILEY WANG-EKVALL, LLP

5  
6 By:           /s/ Michael L. Simon            
7 MICHAEL L. SIMON  
8 Attorneys for Debtor and  
9 Debtor-in-Possession  
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**DECLARATION OF HOWARD GROBSTEIN**

1  
2  
3 I, Howard Grobstein, declare as follows:

4 1. I am the Chief Restructuring Officer of the Debtors and a founder and  
5 partner of Grobstein Teeple, LLP ("GT"). I know each of the following facts to be true of  
6 my own personal knowledge, except as otherwise stated and, if called as a witness, I  
7 could and would competently testify with respect thereto. I make this declaration in  
8 support of the *Motion to Extend Exclusivity Periods Pursuant to 11 U.S.C. § 1121(d)* (the  
9 "Motion"). Unless otherwise defined in this declaration, all terms defined in the Motion  
10 are incorporated herein by reference.

11 2. The Debtors are in the process of liquidating their assets in an orderly  
12 fashion in order to maximize the return for creditors and investors and to distribute the  
13 proceeds in a manner consistent with the Bankruptcy Code's priority scheme.

14 3. It is my understanding that, pre-petition, many of the Debtors made loans to  
15 or investments in other Debtors. My firm, GT, and I need additional time to complete the  
16 reconciliation of the Debtors' books and records before the Debtors can propose and  
17 negotiate plans of reorganization. The reconciliation includes an analysis of  
18 intercompany transfers, which is particularly complex. There are multiple situations  
19 where it appears that a debt incurred by one Debtor was "moved" to another Debtor  
20 without a readily apparent justification. There are also multiple situations where interest  
21 and principal payments were made to a noteholder by the Debtor who booked the debt  
22 and not the promissory note obligor.

23 4. The Debtors have made significant progress towards reorganization and  
24 are diligently moved forward towards confirmation in good faith. The Debtors have taken  
25 a number of steps to achieve this, including obtaining authority to implement sale  
26 procedures that reduce the associated administrative overhead, and consummating  
27 several sales and transactions thereunder.  
28

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1           5.       Since the Debtors filed their first Motion to Extend Exclusivity on September  
2 15, 2017, to my knowledge, the Debtors have obtained Court authority to consummate 12  
3 REO sales, 3 short payoff settlements, 1 foreclosure sale, 1 cash for keys deal, 3  
4 mortgage loan sale agreements, and 2 deeds in lieu of foreclosure. In addition, the  
5 Debtors have held negotiations to monetize a number of the Debtors' assets.


6           6.       The Debtors have also made significant efforts to provide interested parties  
7 with accurate, timely, and transparent information. I have conducted numerous in-person  
8 meetings and teleconferences with concerned creditors and investors, provided regular  
9 written communications to investors and creditors with significant updates on the  
10 progress of these cases, and established a portal that allows interested parties to access  
11 useful information for free. I have also eliminated all rental obligations moving forward for  
12 the Debtors by moving the Debtors' operations and employees into GT's offices where  
13 the Debtors do not pay rent.

14           7.       To my knowledge, at this time, the Debtors are generally current on paying  
15 ordinary course of business undisputed administrative expenses and all post-petition U.S.  
16 Trustee fees.

17           8.       The Debtors are not using exclusivity as a tactical device to force creditors  
18 and investors to submit to the Debtors' reorganization demands. Further, given the  
19 complexities of these cases and the good-faith progress made thus far, I believe the  
20 Debtors deserve an opportunity to exclusively file plans and solicit acceptances thereof.

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

23           Executed on this 18 day of January 2018, at Woodcreek Hills, California.

24  
25   
26 \_\_\_\_\_  
27 HOWARD B. GROBSTEIN  
28

## 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:  
**3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626**

A true and correct copy of the foregoing document entitled (*specify*): **MOTION TO EXTEND EXCLUSIVITY PERIODS PURSUANT TO 11 U.S.C. § 1121(d); MEMORANDUM OF POINTS AND AUTHORITIES; AND DECLARATION OF HOWARD GROBSTEIN IN SUPPORT** 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 18, 2018**, 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*) **January 18, 2018**, 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.

The Hon. Scott C. Clarkson  
United States Bankruptcy Court  
411 West Fourth Street, Suite 5130  
Santa Ana, CA 92701-4593

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.

January 18, 2018  
Date

Carol Sheets  
Printed Name

/s/ Carol Sheets  
Signature

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- Kyra E Andrassy kandrassy@swelawfirm.com,  
csheets@swelawfirm.com;gcruz@swelawfirm.com;hdavis@swelawfirm.com
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