

1 **NACH, RODGERS, HILKERT & SANTILLI**

2 2001 East Campbell Avenue, Suite 103

3 Phoenix, AZ 85016

4 Telephone No.: (602) 258-6000

5 Facsimile No.: (602) 258-6003

6 Stuart B. Rodgers – 025720

7 Helen K. Santilli – 032441

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9 Stuart.Rodgers@NRHSLaw.com

10 Helen.Santilli@NRHSLaw.com

11 *Counsel for Robert A. MacKenzie, Trustee*

12 **IN THE UNITED STATES BANKRUPTCY COURT**
13 **FOR THE DISTRICT OF ARIZONA**

14 In re:

(Chapter 7 Case)

15 AMIE LYN ERICKSON,

No. 2:24-bk-03393-DPC

16 Debtor.

**NOTICE OF TRUSTEE’S: (1)
MOTION TO SELL ESTATE’S
INTEREST IN STRUCTURED
SETTLEMENT ANNUITY FREE AND
CLEAR OF OF CLAIMS AND
INTERESTS; AND (2) APPLICATION
FOR AUTHORIZATION TO
TRANSFER STRUCTURED
SETTLEMENT ANNUITY PAYMENT
RIGHTS TO SUCCESSFUL
PURCHASER**

AND

NOTICE OF AUCTION

Hearing Date: April 28, 2025

Hearing Time: 11:00 am

**Hearing Location: U.S. Bankruptcy
Court, 230 N. First Avenue, Courtroom
603, Phoenix, Arizona 85003¹**

17 **TO: CREDITORS AND PARTIES-IN-INTEREST**

18 **NOTICE OF HEARING ON SALE MOTION/NOTICE OF AUCTION**

19 **PLEASE TAKE NOTICE** that Robert A. MacKenzie, Trustee, (“Trustee”), has filed a
20 *Trustee’s: (1) Motion to Sell the Estate’s Interest in Structured Settlement Annuity Payment*
21 *Rights; and (2) Application to for Authorization to Transfer Structured Settlement Annuity*
22 *Payment Rights to Successful Purchaser (“Motion and Application”)* a complete copy of which
23 is on file with the Court and available for inspection. The pertinent provisions of the Motion and
24 Application are set forth below.

25 ¹ Bidders/parties outside of Maricopa County may appear via Zoom as more fully set forth herein.

1 The Court has scheduled an in person hearing on this matter for **April 28, 2025** to be held at the
2 the United States Bankruptcy Court, 230 N. First Avenue, Courtroom 603, Phoenix, Arizona
85003 at 11:00 am.

3 Parties interested in bidding may appear in person to bid or may appear via Zoom as follows:

4 <https://www.zoomgov.com/j/1605289889?pwd=eGdIYjhhY2ViaXFvMHJXeDZoUTVQQOT09>

5 Meeting ID: 160 528 9889

6 Passcode: 479849

7 **Attorneys located in Maricopa County must attend the hearing in person.**

8 Any person opposing the Motion and Application shall file a written objection, on or
9 before twenty-one (21) days of the date of this mailing, and shall appear at the hearing.
10 Objections to the Motion and Application should be mailed/delivered as follows: Clerk of the
11 United States Bankruptcy Court: (a) by hand-delivery/mail: to 230 North First Avenue, Suite 101,
12 Phoenix, Arizona 85003-1706; or (b) electronically at the Court's website: ecf.azb.uscourts.gov
13 using the Court's electronic filing procedures, with a copy to: Nach, Rodgers, Hilkert & Santilli
14 2001 E. Campbell Ave., Suite 103, Phoenix, AZ 85016. The failure to respond within the
15 foregoing period of time, or to appear at the hearing, may result in the Court approving the
16 Motion and proceeding with the sale without further notice.

17 **NOTICE OF SALE MOTION**

13 Property to be Sold	14 The Estate's interest in the receipt of payments from 15 Executive Life Insurance Company of New York 16 through Guaranty Association Benefits Company 17 ("GABC") as follows: 18 Policy Number: N25967612A 19 Measuring Life: Amie Lyn Erickson 20 The property being sold is 439 monthly life contingent 21 payments of \$900.00 beginning January 21, 2026 and 22 through August 21, 2062, which totals approximately 23 \$395,100.00 (" Property ").
24 Terms of Sale	25 Interested buyers must do their own due diligence to 26 determine the extent of the Estate's interest in the 27 Property. 28 The Property will be sold As-Is, Where-Is, with No Representations, Guarantees or Warranties, free and clear of any liens, claims, encumbrances and interests with all valid and enforceable liens, claims, encumbrances and interests to attach to the sale proceeds in accordance with 11 U.S.C. §§ 363(b) and (f). Any bid placed on the Property shall be made subject to the condition that the successful bidder will be purchasing the Estate's interest pursuant to a Bankruptcy Court sale order ("Sale Order") (the proposed form of Sale Order is attached to the Motion and Application), and subject to the further condition that if any other orders are required to effectuate a

	<p>transfer of the Property to the successful bidder, including orders in a different court or forum, it is the sole responsibility of the successful bidder to seek such relief and the bid and the closing of the sale are not contingent upon the successful bidder obtaining such.</p> <p>All sales are subject to Trustee's approval.</p>
<p>Proposed Purchaser</p>	<p>The Trustee has received an offer from David Pullman of The Pullman Group, LLC ("Proposed Buyer") to purchase the Estate's interest in the Property for a total purchase price of \$41,000.00 ("Offer").</p> <p>Based on the Social Security Administration's website (www.ssa.gov/cgi-bin/longevity.cgi), a U.S. female born in January of 1977 (Debtor's birthday) has an average life expectancy of 85.5 years as of March 10, 2025 (an additional 37.5 years).</p> <p>Upon information and belief, Debtor previously transferred the Property from January 21, 2014 through December 21, 2025 to 321 Henderson Receivables Limited Partnership ("Henderson").¹ Upon information and belief, given the foregoing transfer, the Debtor is not entitled to monthly payments of approximately \$900.00 until January 21, 2026.</p> <p>The 439 monthly payments assumes the Debtor will live 36.5 years after January 1, 2026, therefore assuming she will live to be approximately 85.5. This assumes that the Debtor remains alive for the entire duration of that period as the payments are life contingent.</p> <p>Payment from the party making the highest and best bid at the sale, which is approved by the Trustee and the Court, will be due the later of five (5) business days after the entry of this Court's order approving the Motion.</p>
<p>Bidding/Over Bids</p>	<p>The sale is subject to higher and better bids at sale hearing. Interested parties must attend the hearing to bid.</p> <p>Interested bidders may request information regarding the Estate's interest in the Property from Helen K. Santilli at helen.santilli@nrhslaw.com or by contacting her at 602-258-6000. Parties may be required to sign a non-disclosure agreement to receive the documentation. The Trustee makes no warranties or representations</p>

¹ Upon information and belief, sometime after Henderson's purchase, Henderson was acquired or is being administered by J.G. Wentworth. Counsel for J.G. Wentworth confirmed on March 11, 2025 that they are receiving the payments consistent with the prior purchase from GABC. Nonetheless, buyers must do their own due diligence.

1		regarding the accuracy of the information that is produced. Interested bidders may not rely on the information in this Notice, or any other documentation provided to them by the Trustee in making an offer and/or bid and must perform their own due diligence to analyze the value of the Estate's interest in the Property.
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3		
4		
5	Insider	The Proposed Buyer is not an insider and is a good faith purchaser and is entitled to the benefits provided by 11 U.S.C. § 363(m).
6		
7	To Obtain More Information	For more information contact Trustee's counsel, Helen K. Santilli, at the above-address/phone number.
8	Description of Interest in the Property	Upon information and belief, there are no liens, claims, encumbrances or interests against the Estate's interest in the Property (other than those prior transfers as more fully set forth in the Motion and Application). The Trustee has conducted a UCC filing search with the Arizona and Washington Secretaries of State, and no liens or encumbrances appear.
9		
10		
11		
12	Appraisals	None
13	Compensation/Fees	None
14	Deadline to Object	Any objection shall be filed within twenty-one days of the date of this mailing.
15		
16	Motion for Stay Relief	There have been no motions for relief sought as to the scheduled interest in the Property.
17		

18 **RESPECTFULLY SUBMITTED** this 27th day of March, 2025.

19 **NACH, RODGERS, HILKERT & SANTILLI**

20
21 By: /s/ Helen K. Santilli
22 Stuart B. Rodgers
23 Helen K. Santilli
24 Attorneys for Trustee

1 **A COPY** of the foregoing delivered via electronic mail / US mail / facsimile as indicated:

2 First Executive Corp.
3 11444 West Olympic Blvd.
4 Los Angeles, CA 90064

Altus Finance
2 Executive Circle
Suite 260
Irvine, CA 92614
Email: admin@altusoak.com

5 Executive Life Insurance Company
6 PO Box 80
7 380 N. Broadway
8 Jericho, New York 11753

321 Henderson Receivables Limited
Partnership
2215-B Renaissance Drive
Suite 5
Las Vegas, NV 89119

9 Guaranty Association of Benefits Company
10 PO Box 4366
11 Clinton, IA 52733-4366
12 Fax: 803-333-2417

Guaranty Association of Benefits Company
PO Box 1154
Jacksonville, IL 62651-1154

13 JG Wentworth
14 Email: mrodden@jgwentworth.com

Amie Lyn Erickson
8053 N. 109th Lane
Peoria, AZ 85345

15 James R. Gaudiosi
16 Jim Gaudiosi, Attorney at Law PLLC
17 17505 N. 79th Ave., Ste. 207
18 Glendale, AZ 85308
19 Email: jim@gaudiosilaw.com
20 *Attorney for Debtor*

Office of U.S. Trustee
230 North First Avenue
Phoenix, AZ 85003
Email: Patty.Chan@usdoj.gov
Email: ustpreion14.px.ecf@usdoj.gov

21 David Pullman
22 Email: dpullman@pullmanbonds.com
23 Proposed Buyer

All parties on the attached master mailing
matrix.¹

24 By: /s/ Kay Lucas

28 ¹ A copy of the master mailing matrix will not be noticed. Parties interested in obtaining a copy may request one in writing from Trustee's counsel via email at helen.santilli@nrhslaw.com.

Label Matrix for local noticing
0970-2
Case 2:24-bk-03393-DPC
District of Arizona
Phoenix
Thu Mar 27 13:15:29 MST 2025

Aidvantage on behalf of
Dept of Education
PO Box 300001
Greenville Tx 75403-3001

Banner Health
PO Box 42008
Phoenix AZ 85080-2008

Banner University Medical Group
PO Box 741742
Los Angeles CA 90074-1742

CREDIT FIRST NA
PO BOX 818011
CLEVELAND, OH 44181-8011

Chase Card Services
Attn: Bankruptcy
P.O. 15298
Wilmington DE 19850-5298

(p)CROSS RIVER BANK
2115 LINWOOD AVENUE
FORT LEE NJ 07024-5041

(p)H & R ACCOUNTS INC
5320 22ND AVENUE
MOLINE IL 61265-3627

Johnson Mark LLC
1601 N. 7th St
Phoenix AZ 85006-2360

Navient
Attn: Bankruptcy
Po Box 9635
Wilkes Barre PA 18773-9635

AZ Banner Imaging
PO Box 741740
Los Angeles CA 90074-1740

Arizona Centers for Digestive Health
PO Box 207323
Dallas TX 75320-7323

Banner Imaging
PO Box 2939
Phoenix AZ 85062-2939

CACH, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City UT 84130-0285

Citibank, N.A.
388 Greenwich Street
New York NY 10013-2362

Envision Physician Services
645 E Missouri Ave.
Phoenix AZ 85012-1351

Hospital Based BUMG Phoenix
PO Box 741740
Los Angeles CA 90074-1740

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

(p)PENN CREDIT CORPORATION
PO BOX 69703
HARRISBURG PA 17106-9703

AZ West Endoscopy Center, LLC
PO Box 4029
Alameda CA 94501-0429

BANNER HEALTH
PO BOX 18
PHOENIX, AZ 85001-0018

Banner University Med Ctr Phx
PO Box 2978
Phoenix AZ 85062-2978

CFNA
Attn: Bankruptcy
Po Box 81315
Cleveland OH 44181-0315

Capital One N.A.
by AIS InfoSource LP as agent
PO Box 71083
Charlotte, NC 28272-1083

Consumer Portfolio Services, Inc.
19500 Jamboree Road
Ste 600
Irvine CA 92612-2467

First National Collection Bureau, Inc.
50 W. Liberty Street
Suite 250
Reno NV 89501-1973

JPMorgan Chase Bank, N.A.
s/b/m/t Chase Bank USA, N.A.
c/o Robertson, Anschutz, Schneid,
Crane & Partners, PLLC
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487-2853

Lvnm Funding/Resurgent Capital
Attn: Bankruptcy
Po Box 10497
Greenville SC 29603-0497

Resurgent Capital Services
Attn: Bankruptcy
Po Box 10497
Greenville SC 29603-0497

Sensory testing Systems
8655 E. Via De Ventura
Suite E155
Scottsdale AZ 85258-3354

Synchrony Bank/Care Credit
Attn: Bankruptcy
Po Box 965060
Orlando FL 32896-5060

TD Bank, USA
by American InfoSource as agent
PO Box 248866
Oklahoma City, OK 73124-8866

Target NB
C/O Financial & Retail Services
Mailstop BT PO Box 9475
Minneapolis MN 55440-9475

The E & A Group
Po Box 5070
Laguna Beach CA 92652-5070

Transworld System Inc
Attn: Bankruptcy
Po Box 15618
Wilmington DE 19850-5618

U.S. TRUSTEE
OFFICE OF THE U.S. TRUSTEE
230 NORTH FIRST AVENUE
SUITE 204
PHOENIX, AZ 85003-1725

Valley Anesthesiology Consultants, LLC
PO Box 740557
Los Angeles CA 90074-0557

Waypoint Resource Group
Attn: Bankruptcy
Po Box 8588
Round Rock TX 78683-8588

AMIE LYN ERICKSON
8053 N. 109TH LANE
PEORIA, AZ 85345-0407

JAMES R. GAUDIOSI
Jim Gaudiosi, Attorney at Law
17505 N. 79th Ave
Suite 114
Glendale, AZ 85308-8727

ROBERT A. MACKENZIE
2001 E. CAMPBELL AVE., SUITE 200
PHOENIX, AZ 85016-5574

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Cross River Bank
400 Kelby St
14th Fl
Fort Lee NJ 07024

H&R Accounts
5320 22nd Avenue
Moline IL 61265

Penn Credit
Attn: Bankruptcy
2800 Commerce Dr
Harrisburg PA 17110

End of Label Matrix
Mailable recipients 41
Bypassed recipients 0
Total 41