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11 *Attorneys for Eric M. Haley, Case Trustee*

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

14 In re:

15 MIDAS GOLD GROUP, LLC,

16 Debtor.

(Chapter 7 Case)

No. 2:24-bk-04587-DPC

**NOTICE OF ACCELERATED  
HEARING ON TRUSTEE’S MOTION  
FOR ORDER AUTHORIZING SALE  
OF PROPERTY OF THE ESTATE  
SUBJECT TO LIENS, CLAIMS, AND  
INTERESTS AND APPROVING  
BIDDING PROCEDURES; AND**

**NOTICE OF SHORTENED  
NOTICING PERIOD**

**DATE: September 15, 2025**  
**TIME: 1:30 p.m.**  
**LOCATION: Courtroom 603**

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

20 **NOTICE IS HEREBY GIVEN** that on September 4, 2025, Eric M. Haley, Chapter 7 Trustee  
21 (“Trustee”), by and through undersigned counsel, filed his *Trustee’s Motion for Order*  
22 *Authorizing Sale of Property of the Estate Subject to Liens, Claims and Interests and Approving*  
23 *Bidding Procedures* (“**Motion**”). A complete copy of the Motion is on file with the Clerk of the  
24 Court and available for inspection or can be obtained by written request to Trustee’s counsel as  
25 indicated above. The Motion seeks Court authorization to sell Property of the bankruptcy estate (as  
26 defined hereinafter and as more fully described in the Motion) pursuant to the terms set forth  
hereinafter. Although the Property to be sold includes personally identifiable customer information,  
based upon Trustee’s review of a sampling of Debtor’s contracts with its customers, there is no  
restriction or prohibition on the Debtor’s ability to sell or otherwise transfer customer information.  
In the event that any person opposes the Motion, the procedure for responding to the Motion is set  
forth hereinafter.

27 **NOTICE IS FURTHER GIVEN** that the Court has shortened the noticing period pursuant to  
28 Court Order entered at Docket Entry No. 334 and any person opposing the Motion shall file a  
written objection, specifying the reason therefor, one (1) business day prior to the start of the

Hearing (as set forth hereinafter) as follows: United States Bankruptcy Court, as follows: (a) by hand-delivery or mail to the Clerk of the Court, 230 North First Avenue, Suite 101, Phoenix, Arizona 85003-1706; or (b) electronically at the Court's website: [ecf.azb.uscourts.gov](http://ecf.azb.uscourts.gov) using the Court's electronic filing procedures, with a copy to: Paul M. Hilkert, Nach, Rodgers, Hilkert & Santilli, at the above-address.

**NOTICE IS FURTHER GIVEN** that the Court has set an accelerated hearing on this matter for **September 15, 2025**, to be held in person in Courtroom 603 at the United States Bankruptcy Court, 230 N. First Ave, Phoenix, AZ 85003 at the hour of **1:30 p.m.** (the "**Hearing**").

**NOTICE IS FURTHER GIVEN** that the Estate's interest in the below-described Property will be offered to the person making the highest and best bid at public sale by Eric M. Haley, Trustee, to be conducted at the Hearing.

Property to be Sold:	Estate's interest in the following property:  The Debtor's list of clients/client information (including personally identifiable customer information) as maintained in the Debtor's account with Salesforce (" <b>Property</b> ").
Terms of Sale:	<p>Prospective purchasers are encouraged to personally inspect/perform their own due diligence of the Property being sold, as the Property will be sold "AS IS, WHERE IS", with no representations, guarantees, or warranties, subject to liens, claims, and interests. <b><i>All sales are subject to Trustee and Bankruptcy Court approval.</i></b> Trustee makes no representations regarding the title or condition of the Property nor does he make any warranties regarding encumbrances, liens or interests. Although the highest bidder will be responsible for the transfer of the data, Trustee will cooperate as necessary facilitate the data transfer.</p> <p><b>The Property is stored electronically with Salesforce. The buyer of the Property shall be solely responsible for the costs of accessing the Property and shall execute any required agreements with, and pay directly to, Salesforce, the approximate amount of \$18,525.18 by September 19, 2025. The Buyer takes all risk if payment is not timely delivered, or all contracts are not executed, by September 19, 2025</b></p> <p>Trustee has received an offer from Aaron Haley, a non-insider former employee of the Debtor and current litigant in an action brought by the Debtor pre-petition against the Buyer, <b>to purchase the Property for payment directly to Salesforce of a license reinstatement fee in the approximate amount of \$18,525.18, plus an additional \$21,000.00 paid to Trustee/the Estate (the "Offer").</b></p> <p>The Offer is subject to higher and better bids to be considered at the Hearing. The Trustee requests in the Motion that interested bidders contact his counsel via email at <a href="mailto:paul.hilkert@nrhslaw.com">paul.hilkert@nrhslaw.com</a> to make his/her/its intent</p>

	known to bid at the Hearing and to provide Trustee with proof of available funds to close the sale.
To View the Property or Obtain More information:	Given the nature of the Property, there is nothing available for prospective bidders to view. For questions or more information regarding the Property, contact Paul Hilkert by email at <a href="mailto:paul.hilkert@nrhslaw.com">paul.hilkert@nrhslaw.com</a> or by telephone at (602) 258-6000.
Description of Interest(s) in the Property:	Trustee is not aware of any perfected liens, encumbrances or asserted interests as it pertains to the Property.  There have been no Motions for Relief from the Stay filed in regards to the Property.  <i>The Property is being sold as-is, where-is, with no warranties or guarantees, subject to liens, claims and interests, and it is the responsibility of the buyer to perform all necessary due diligence with regard to the Property being sold.</i>
Appraisals:	Trustee is not aware of any recent appraisals on the Property being sold.
Compensation/Fees:	No compensation will be paid upon sale of the Property.
Objections to proposed sale:	Any objection to the sale must be filed with the Bankruptcy Court by <b>Friday, September 12, 2025</b> .

DATED: September 5, 2025

**NACH, RODGERS, HILKERT & SANTILLI**

By: /s/ Paul M. Hilkert  
Stuart B. Rodgers  
Paul M. Hilkert  
Attorneys for Trustee