## UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS WESTERN DIVISION

| In re              | ) | Case No. 07-43128-JBR |
|--------------------|---|-----------------------|
| Gailon Arthur Joy, | ) | Chapter 7             |
| Debtor             | ) |                       |

## NOTICE OF INTENDED PRIVATE SALE OF ESTATE PROPERTY, DEADLINE FOR SUBMITTING OBJECTIONS AND HIGHER OFFERS, AND HEARING DATE

Notice is hereby given, pursuant to 11 U.S.C. section 363, Fed. R. Bankr. P. 2002(a)(2) and 6004, and MLBR 2002-5 and 6004-1, that the trustee, Janice G. Marsh, intends to sell at a private sale the right, title, and interest of the debtor, Gailon Arthur Joy, in certain property of the estate consisting of:

(1) all domain names owned by the debtor, Gailon Arthur Joy, and (2) all prepetition claims the bankruptcy estate may have against (a) Three Angels Broadcasting Network, Inc., and (b) its officers, directors, shareholders and employees, including Danny Shelton (collectively "Buyers"), including a release of any claims the estate has or might have against the Buyers ("collectively Property")

The trustee has received an offer to purchase the Property for the sum of \$5,000.00 in cash or its equivalent from the Buyers. The relationship of the proposed buyers to the debtor is: None. The relationship of the proposed buyers to the trustee is: None.

The sale shall take place on or before 30 days after the entry of a final, nonappealable order. The terms of the proposed sale are more particularly described in a Motion for Order Authorizing and Approving Private Sale of Property of the Estate ("Motion") filed with the court on November 30, 2007, and served as stated in the certificate of service of the Motion.

The Property will be sold free and clear of all liens, claims and encumbrances, with such valid liens, claims and encumbrances, if any, attaching to the net proceeds of the sale according to priorities established under applicable law.

Any objections to the sale and/or higher offers shall be filed in writing with the Clerk, United States Bankruptcy Court at the Harold Donohue Federal Courthouse, 595 Main Street, Worcester, MA 01608-2076, on or before \_\_\_\_\_\_ at 4:30 pm ("Objection Deadline"). A copy of any objection or higher offer also shall be served upon the undersigned. Any objection to the sale must state with particularity the grounds

for the objection and why the intended sale should not be authorized. Federal R. Bankr. P. 9014 shall govern any objection to the sale.

Through this notice, higher offers for the Property are hereby solicited. Any higher offer must be accompanied by a cash deposit of \$5,000.00 in the form of a certified or bank check made payable to "Janice G. Marsh, Trustee." Higher offers must be on the same terms and conditions, other than the purchase price, provided in the purchase and sale agreement.

A hearing on the Motion, objections, or higher offers is scheduled to take place on \_\_\_\_\_\_, at \_\_\_\_\_ am/pm before the Honorable Joel B. Rosenthal, United States Bankruptcy Judge, Courtroom 3, Harold Donohue Federal Courthouse, 595 Main Street, Worcester, Massachusetts. Any party who has filed an objection or higher offer is expected to be present at the hearing, failing which the court will overrule the objection or will strike the higher offer. If no objection to the Motion or higher offer is timely filed, the bankruptcy court, in its discretion, may cancel the scheduled hearing and approve the sale without a hearing.

At the hearing on the sale, the court may (1) consider any requests to strike a higher offer, (2) determine further terms and conditions of the sale, (3) determine the requirements for further competitive bidding, and (4) require one or more rounds of sealed or open bids from the original offeror and any other qualifying offeror.

The deposit will be forfeited to the estate if the successful purchaser fails to complete the sale by the date ordered by the court. If the sale is not completed by the buyer approved by the court, the court, without further hearing, may approve the sale of the Property to the next highest bidder.

The trustee has requested that the order approving the sale NOT be stayed, as allowable under Rule 6004(g) of the Federal Rules of Bankruptcy Procedure.

Any questions concerning the intended sale shall be addressed to the undersigned.

Respectfully Submitted,

/s/ Janice G. Marsh
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