

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

In re:	)	Case No. 25-11440 JGR
Three Points Center North Carolina, LLC	)	Chapter 7
	)	
In re:	)	
Three Points Center, LLC	)	Case No. 25-11441 JGR
	)	Chapter 7
	)	
In re:	)	
Three Points Properties North Carolina, LLC	)	Case No. 25-11443 JGR
	)	Chapter 7
	)	
In re:	)	Case No. 25-11444-JGR
Three Points Properties, LLC	)	Chapter 7
	)	
	)	Jointly administered
	)	Under Case No. 25-11440-JGR

**NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 9013-1 OF
TRUSTEE'S MOTION FOR ENTRY OF
AN ORDER (A) APPROVING BIDDING PROCEDURES
AND BID PROTECTIONS IN CONNECTION WITH THE SALE OF
ESTATE ASSETS; (B) APPROVING
THE FORM AND MANNER OF NOTICE THEREOF; AND (C) SCHEDULING AN
AUCTION**

OBJECTION DEADLINE: NOVEMBER 4, 2025

YOU ARE HEREBY NOTIFIED that Harvey Sender, in his capacity as chapter 7 trustee of the Three Points Properties bankruptcy estates has filed his Motion for Entry of an Order (A) Approving Bidding Procedures and Bid Protections in Connection with the Sale of Estate Assets; (B) Approving the Form and Manner of Notice thereof; and (C) Scheduling an Auction in connection with the sale of estate assets located in Hurricane, Utah. The assets are comprised of approximately 193 acres of real property (Parcel Numbers 2167-HV, 3332-HV, 2168-B-HV); improvements (consisting of land, a main building, girls dorm, boys dorm, water building, tack shed/equine office, gray building, cabin, art building, MPR building and pods); Water Rights (81-527, 81-537 and 81-3241) as well as the personal property kept and stored on the real property, including several motor vehicles, furniture, office equipment, appliances, tack, and supplies.

The consideration to be paid for all the foregoing assets under the Stalking Horse Purchase Agreement is \$4,100,000. The bid procedures order proposes an initial overbid amount of \$4,300,000, with bid increments following the initial overbid in \$100,000 increments. If the

Stalking Horse Bidder is not the successful bidder at Auction, the bid procedures order proposes to pay him a breakup fee of \$82,000.

The Trustee is seeking the entry of a bidding procedures order which will govern the marketing and sale of the property described above through a competitive bidding and auction process in which interested parties will be able to submit bids to the Trustee on or before December 8, 2025 and/or participate in an auction which will take place on December 12, 2025. If the Court approves the pending Motion to Set Bid Procedures, all creditors and interested parties will receive further notice if they wish to participate in bidding or the auction of the assets to be sold.

The Motion is subject to Bankruptcy Court approval. If you oppose the Motion or object to the requested relief your objection and request for hearing must be filed on or before the objection deadline stated above, served on the Movant at the address indicated below, and must state clearly all objections and any legal basis for the objections. The Court will not consider general objections.

In the absence of a timely, substantiated objection and request for hearing by an interested party, the Court may approve or grant the requested relief without any further notice to creditors or other interested parties.

Dated this 14th day of October, 2025.

Respectfully submitted,

/s/ Lance J. Goff

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