

Jeff P. Prostok  
State Bar No. 16352500  
J. Robert Forshey  
State Bar No. 07264200  
Lynda L. Lankford  
State Bar No. 11935020  
**FORSHEY PROSTOK, LLP**  
777 Main Street, Suite 1290  
Fort Worth, TX 76102  
Telephone: (817) 877-8855  
Facsimile: (817) 877-4151  
[jprostok@forsheyprostok.com](mailto:jprostok@forsheyprostok.com)  
[bforshey@forsheyprostok.com](mailto:bforshey@forsheyprostok.com)  
[llankford@forsheyprostok.com](mailto:llankford@forsheyprostok.com)

PROPOSED ATTORNEYS FOR  
DEBTOR AND DEBTOR-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**In re:** § **Chapter 11**  
§  
**HBT JV, LLC,** § **Case No.: 17-40659-mxm-11**  
§  
**Debtor.** § **HEARING DATE AND TIME:**  
§ **February 27, 2017 at 9:30 a.m.**

**NOTICE OF EXPEDITED HEARING**

**PLEASE TAKE NOTICE** that an expedited hearing on Debtor’s *Motion for Order (i) Approving Sale Procedures Relating to Sale of Substantially All of the Estates Assets; (ii) Approving Procedure For Granting Bid Protections; (iii) Scheduling Objection Deadlines and the Hearing to Approve the Sale; (iv) Approving the Form and Manner of Notices; (v) Establishing Procedures Relating to Assumption and Assignment of Certain Contracts, Including Notice of Proposed Cure Amounts; and (vi) Granting Related Relief* (Docket No. 9] has been set for **February 27, 2017 at 9:30 a.m.** before the Honorable Mark X. Mullin, United States Bankruptcy Judge for the Northern District of Texas, Fort Worth Division, United States Courthouse, 501 West Tenth Street, Room 128, Fort Worth, Texas 76102.

DATED: February 21, 2017

Respectfully submitted by:

/s/ Jeff P. Prostok

Jeff P. Prostok

State Bar No. 16352500

J. Robert Forshey

State Bar No. 07264200

Lynda L. Lankford

State Bar No. 11935020

**FORSHEY PROSTOK, LLP**

777 Main Street, Suite 1290

Fort Worth, TX 76102

Telephone: (817) 877-8855

Facsimile: (817) 877-4151

[jprostok@forsheyprostok.com](mailto:jprostok@forsheyprostok.com)

[bforshey@forsheyprostok.com](mailto:bforshey@forsheyprostok.com)

[llankford@forsheyprostok.com](mailto:llankford@forsheyprostok.com)

**PROPOSED ATTORNEYS FOR  
DEBTOR AND DEBTOR-IN-POSSESSION**

**CERTIFICATE OF SERVICE**

I hereby certify that, on February 21, 2017, a true and correct copy of the foregoing document was served electronically by the Court's ECF system on all parties receiving electronic notice in this case and via first class, U.S. mail on all parties on the attached service list.

/s/ Jeff P. Prostok

Jeff P. Prostok

L:\JPROSTOK\HBT JV (Honda of Burluson) (C11) #5884\Pleadings\NOH - bid procedure 2.21.17.doc

**Service List**  
**HBT JV**  
**#5884**

HBT JV, LLC  
Attn: Kenneth L. Schnitzer, Manager  
350 Phelps Dr.  
Irving, TX 75038-6507

United States Trustee  
Lisa Lambert/Liz Ziegler/Erin Schmidt  
1100 Commerce Street, Room 976  
Dallas, TX 75242

Internal Revenue Service  
Centralized Insolvency Operations  
PO Box 7346  
Philadelphia, PA 19101-7346

Mercedes-Benz Financial Services USA LLC  
Attn: Dealer Credit Manager  
13650 Heritage Pkwy.  
Fort Worth, TX 76177

Mercedes-Benz Financial Services USA LLC  
c/o Kim Gage/Randall P. Mroczynski  
Cooksey Toolen Gage Duffy & Woog  
535 Anton Blvd., 10<sup>th</sup> Floor  
Costa Mesa, CA 92626

Pam Ruiz  
JP Morgan Chase  
Mail Code TX1-3078  
101 N. Beaton St., 2<sup>nd</sup> Floor  
Corsicana, TX 75110

Kenneth L. Schnitzer, Jr.  
Park Place Dealerships  
2021 McKinney Ave., Suite 420  
Dallas, TX 75201

State Comptroller of Public Accounts  
Revenue Acctg. Div – Bankruptcy Section  
PO Box 13528  
Austin, TX 78711

Johnson County Tax Assessor  
PO Box 75  
Cleburne, TX 76033-0075

Victor Bernal  
c/o James D. Shields  
Bart F. Higgins / David A. Shields  
SHIELDS LEGAL GROUP  
16301 Quorum Dr., Suite 250B  
Addison, TX 75001

**TWENTY LARGEST UNSECURED CREDITORS**

HBT Land, LLC  
11 Greenway Plaza, Suite 3100  
Houston, TX 77046

DK8 LLC  
11 Greenway Plaza, Suite 3100  
Houston, TX 77046

Park Place Motorcars, Ltd.  
350 Phelps Dr.  
Irving, TX 75038

America Honda Motor Company, Inc.  
1919 Torrence Blvd.  
Torrance, CA 90501

Allstate Dealer Services  
PO Box 40525  
Jacksonville, FL 32203

National Automotive Experts  
8370 Dow Circle, Suite 1000  
Strongsville, OH 44136

Raphael Vela  
406 Allen Ave.  
Duncanville, TX 75137

David Randall Manly  
4617 Glacier St.  
Fort Worth, TX 76115

Andrea Rosales de Martinez  
3274 Olive Place  
Fort Worth, TX 76116

Aaron Ralph Bazile  
6724 Woodway Dr.  
Fort Worth, TX 76133

Martin Iniguez  
2616 Timber Rd.  
Burleson, TX 76028

ABIC Warranty Trust  
10800 Pecan Park Blvd., #410  
Austin, TX 78750

Caroline Marie Scamp  
1676 Fraser Dr.  
Burleson, TX 76028

Gail Ellen Clark  
860 Long Valley Ct.  
Prosper, TX 75078

John Edward Wilson  
3101 Covert Ave.  
Fort Worth, TX 76133

Christy L. Gerken  
1029 Janet St.  
Aubrey, TX 76227

Lenders & Members Service Group  
PO Box 181929  
Arlington, TX 76096

Ralph Stephen McCoy  
2077 Trailwood Dr. W  
Burleson, TX 76028

Cesar Gonzalez  
8828 Poynter St.  
Fort Worth, TX 76123

Calvin Albright Lange  
2109 Ridgmar Blvd. #321  
Fort Worth, TX 76116

## **NOTICE OF APPEARANCE AND REQUEST FOR NOTICE PARTIES**

DK8 LLC  
c/o Stephen A. McCartin  
Mark C. Moore/Nicole L. Hay  
Gardere Wynne Sewell LLP  
2021 McKinney Ave., Suite 1600  
Dallas, TX 75201

HBT Land, LLC/SPH17 LLC/Kenneth L. Schnitzer, Jr.  
c/o Stephen M. Pezanosky/Matthew Ferris  
Haynes and Boone, LLP  
301 Commerce St., Suite 2600  
Fort Worth, TX 76102