

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: KAL AVIATION LLC, Debtor.¹	§ § § § § § §	Chapter 11 Case No. 24-90615 (CML) <i>(Formerly Jointly Administered under Lead Case No. 24-90614)</i>
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**NOTICE OF AUCTION RESULTS, OBJECTION DEADLINE, SALE HEARING,
AND PROPOSED SALE OF REAL PROPERTY IN HOUSTON, TEXAS**

[Re: ECF Nos. 161 and 170]

PLEASE TAKE NOTICE THAT:

1. Sale Motion. On December 22, 2025, Province Fiduciary Services LLC, in its capacity as trustee (the “Trustee”) of the KAL GUC Liquidating Trust (the “Liquidating Trust”),² filed the *Liquidating Trustee’s Motion for Entry of Orders (A) Approving Bidding Procedures for the Sale of Real Property; (B) Authorizing the Sale of Real Property Free and Clear of Liens, Claims and Encumbrances; and (C) Granting Related Relief* [ECF #161] (the “Sale Motion”) in the above-captioned bankruptcy case in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Bankruptcy Court”).

2. Bidding Procedures. On January 21, 2026, the Bankruptcy Court entered an *Order (I) Authorizing and Approving (A) Bidding Procedures and (B) Form and Manner of Notice of Bidding Procedures, Auction, and Sale Hearing; (II) Scheduling an Auction and Sale Hearing; and (III) Granting Related Relief* [ECF #170] (the “Bidding Procedures Order”) approving the bidding procedures attached thereto as Exhibit 1 (the “Bidding Procedures”) for sales of the Debtors’ real properties located in Houston, Texas and Calexico, California (as each is further described and defined in the Bidding Procedures, the “Houston Property” and the “Calexico Property,” respectively). Capitalized terms that are used but not otherwise defined in this Notice shall have the meanings provided in the Bidding Procedures.

¹ The debtors in these chapter 11 cases (collectively, the “Debtors”), along with the last four digits of each Debtor’s federal tax identification numbers, are as follows: Kal Freight Inc. (0249); Kal Aviation LLC (2600); Kal Partz Inc. (0139); Kal Trailers & Leasing Inc. (0840); and KVL Tires Inc. (0320). The Debtors’ chapter 11 cases were jointly administered under Case No. 24-90614 until May 19, 2025, when the Court entered a *Final Decree and Order* [Case No. 24-90614, Dkt. #1084] closing each Debtor’s chapter 11 case except Kal Aviation LLC, Case No. 24-90615.

² The Liquidating Trust was established pursuant to the *Modified Fourth Amended and Restated Combined Disclosure Statement and Plan of Liquidation of Kal Freight Inc. and Its Affiliated Debtors Under Chapter 11 of the Bankruptcy Code* [Case No. 24- 90614, ECF #1023, Ex. A] (together with all exhibits, supplements, and schedules thereto, the “Plan”), as confirmed by the Bankruptcy Court’s Order dated April 17, 2025 [Case No. 24- 90614, ECF #1023].

3. Postponement of Callexico Property Sale. Pursuant to and in accordance with the Bidding Procedures Order, the Trustee determined to postpone the sale of the Callexico Property and to proceed with the Auction and Sale Hearing for only the Houston Property. *See Liquidating Trustee's Notice of Postponement of Auction for Real Property Located in Callexico, California* [ECF #178] (filed Mar. 3, 2026). Subsequent dates will be noticed for bidding, auction and Bankruptcy Court approval for the sale of the Callexico Property.

4. Bid Deadline. The Bid Deadline for the Houston Property was March 2, 2026, at 4:00 p.m. CT, pursuant to the Bidding Procedures.

5. Auction. The Auction for the Houston Property was conducted on March 5, 2026, pursuant to and in accordance with the Bidding Procedures.

6. Proposed Sale of Houston Property. Following the Auction, in accordance with the Bidding Procedures, the Trustee determined that: (a) the Qualified Bid of Saif Lokhandwala (or his designee) of **\$1,300,000.00** is the highest and best Qualified Bid received for the Houston Property; and (b) the Qualified Bid of Ernesto Piris and Miguel Libera (or their designee) of **\$1,150,000.00** is the second highest and second-best Qualified Bid received. Accordingly, the Trustee will seek approval of these Bids at the Sale Hearing as the Successful Bid and Backup Bid for the Houston Property. The Purchase Contracts of the Successful Bidder and Backup Bidder will be filed with the Bankruptcy Court prior to the Sale Hearing. Parties may request copies of such Purchase Contracts in writing to the Trustee's undersigned counsel, Attn: Ruthann Skipper (rskipper@krcf.com).

7. Objection Deadline. The deadline for parties to object to the proposed sale of the Houston Property is **March 6, 2026, at 4:00 p.m. CT**. Objections must be filed in writing with the Bankruptcy Court and served upon the Trustee's undersigned counsel and all other Notice Parties set forth in the Bidding Procedures. Pursuant to the Bidding Procedures Order, any party that does not file and serve an objection prior to the Objection Deadline will be forever barred from objecting to the sale of the Houston Property and will be deemed to consent to the sale free and clear of all liens, claims, encumbrances, and interests.

8. Sale Hearing. The hearing to consider the Sale Motion and the proposed sale of the Houston Property will be conducted on **Monday, March 9, 2026, at 10:30 a.m. CT** in Courtroom 401, 4th Floor, 515 Rusk, Houston, TX 77002. Parties may participate in the Sale Hearing either in person or by an audio and video connection. Audio communication will be by use of the Court's dial-in facility, and video communication will be by use of the GoToMeeting platform, which can be accessed via the link below or through Judge Lopez's homepage.

Telephonic Participation

Dial-in Telephone No: 832-917-1510

Conference Code: 590153

Video Participation

<https://www.gotomeet.me/JudgeLopez>

Audio connections by phone are required for all video participants.

9. Access to Documents. Copies of the Sale Motion, Bidding Procedures Order, and related documents in these cases may be obtained through PACER at <https://pacer.uscourts.gov/>, or free of charge through the Claims Agent's website at <https://cases.stretto.com/KALFreight/>.

DATED: March 5, 2026

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

/s/ Kyle Woodard

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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2026, a true and correct copy of the foregoing notice was filed with the Court and served (i) via the Court's CM/ECF notification system to all parties registered to receive such electronic notices in this case and (ii) via e-mail to the following parties:

United States Trustee

Office of the U.S. Trustee

515 Rusk Street, Suite 3516

Houston, Texas 77002

Attn: Vianey Garza (vianey.garza@usdoj.gov)

Attn: Andrew Jimenez (andrew.jimenez@usdoj.gov)

U.S. Environmental Protection Agency

Jason T. Barbeau (Jason.Barbeau@usdoj.gov)

Jeanne T. Cohn (jeanne.cohn@usdoj.gov)

Environmental Enforcement Section

Environment and Natural Resources Division

UNITED STATES DEPARTMENT OF JUSTICE

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Miami, FL 33185

Inter-Power Corporation
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Attn: David Paleno (dpaleno@interpowerinduction.com)
3578 Van Dyke Ave.
Almont, MI 48003

Inter-Power Corporation
c/o Signature Associates
Attn: Marvin Petrous (mpetrous@signatureassociates.com)

/s/ Kyle Woodard
Kyle Woodard

Exhibit A

**Successful Bidder Purchase Contract
(Houston Property)**

Exhibit B

**Backup Bidder Purchase Contract
(Houston Property)**