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8 Attorneys for Leslie T. Gladstone, Chapter 11 Trustee

9 UNITED STATES BANKRUPTCY COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 In re:

Case No.: 25-04245-JBM11

12 VILLA CHARDONNAY HORSES
13 WITH WINGS, INC.,

**DECLARATION OF LESLIE T.
GLADSTONE IN SUPPORT OF
TRUSTEE'S NOTICE OF
INTENDED ACTION
AUTHORIZING THE USE
OF VETERINARIAN TEAMS
AND RELOCATION OF
VARIOUS ANIMALS**

14 Debtor(s).

15 Honorable J. Barrett Marum

16 I, LESLIE T. GLADSTONE, declare:

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18 1. I am the chapter 11 trustee for the bankruptcy estate of Villa
19 Chardonnay Horses with Wings, Inc. (“**Debtor**”). All the information contained
20 herein is within my personal knowledge, except for those matters alleged on
21 information and belief and as to those matters I believe them to be true. If called
22 as a witness, I could competently testify thereto.

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24 2. On January 29, 2026, I was appointed as chapter 11 trustee of
25 Debtor’s bankruptcy estate (the “**Estate**”).
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1 3. It has come to my attention that the time necessary for veterinarians
2 to adequately examine the animals will exceed the one full day that has been
3 offered by Humane Farming Association (“HFA”). As such, it is my intention to
4 request additional veterinarian teams to address both the farmed animals, the
5 horses, and the cats.

6 4. I have been in contact with other organizations that are willing to
7 provide these same services, at no cost to the Estate.

8 5. Accordingly, I request that the order be modified to provide for
9 multiple visits and potentially multiple veterinary teams to examine the animals, at
10 not cost to the Estate.

11 6. Any veterinary team involved will provide liability and
12 errors/omissions insurance covering their visits and will sign volunteer waiver
13 forms prior to entry.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on March 26, 2026, at La Jolla, California.

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17 /s/ Leslie T. Gladstone
18 Leslie T. Gladstone
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10 SOUTHERN DISTRICT OF CALIFORNIA

11 In re:
12 VILLA CHARDONNAY HORSES
13 WITH WINGS, INC.,
14 Debtor(s).

Case No.: 25-04245-JBM11

PROOF OF SERVICE

15
16 I, Candi Collins, hereby declare as follows:

17 I am over the age of 18 years and not a party to the within action; and I am
18 employed in the County of San Diego, California. My business address is 5656 La
19 Jolla Blvd., La Jolla, California 92037.

20 On March 26, 2026, I served the following document(s):

21 **DECLARATION OF LESLIE T. GLADSTONE IN SUPPORT OF**
22 **TRUSTEE'S NOTICE OF INTENDED ACTION AUTHORIZING**
23 **THE USE OF VETERINARIAN TEAMS AND RELOCATION**
24 **OF VARIOUS ANIMALS**

25 **X TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC**
26 **FILING ("NEF"):** Pursuant to controlling General Order(s) and Local
27 Bankruptcy Rule(s) ("**LBR**"), the foregoing document will be served by the court
28 via NEF and hyperlink to the document. On March 26, 2026, I checked the
CM/ECF docket for this bankruptcy case or adversary proceeding and determined
that the following person(s) are on the Electronic Mail Notice List to receive NEF

1 transmission at the e-mail address(es) indicated below:

- 2 • **Christin A. Batt** christinb@flgsd.com,
3 sandray@flgsd.com;candic@flgsd.com;leslieg@flgsd.com;andrewl@flgsd.
4 com;hildam@flgsd.com;natalik@flgsd.com
- 5 • **Kevin Dwight** kdwright@manatt.com
- 6 • **David K. Eldan** David.Eldan@doj.ca.gov, rpinal@pmcos.com
- 7 • **Leslie T. Gladstone** candic@flgsd.com,
8 christinb@flgsd.com;sandray@flgsd.com;ltg@trustesolutions.net;andrewl
9 @flgsd.com;hildam@flgsd.com;natalik@flgsd.com
- 10 • **Leslie T. Gladstone** leslieg@flgsd.com,
11 candic@flgsd.com;sandray@flgsd.com;christinb@flgsd.com;andrewl@flgs
12 d.com;hildam@flgsd.com;natalik@flgsd.com
- 13 • **Carl Grumer** cgrumer@manatt.com
- 14 • **Benjamin Heston** bhestonecf@gmail.com,
15 benheston@recap.email,NexusBankruptcy@jubileebk.net
- 16 • **Haeji Hong** Haeji.Hong@usdoj.gov,
17 USTP.Region15@usdoj.gov,tiffany.l.carroll@usdoj.gov
- 18 • **Meredith King** mking@fsl.law,
19 ssanchez@fsl.law;jwilson@fsl.law;17913@notices.nextchapterbk.com
- 20 • **Andrew Levin** andrewl@flgsd.com,
21 leslieg@flgsd.com;christinb@flgsd.com;sandray@flgsd.com;candic@flgsd.
22 com;hildam@flgsd.com;natalik@flgsd.com
- 23 • **Hilda Montes de Oca** hildam@flgsd.com,
24 leslieg@flgsd.com;candic@flgsd.com;christinb@flgsd.com;sandray@flgsd.
25 com;andrewl@flgsd.com;natalik@flgsd.com
- 26 • **Shelby Poteet** spoteet@fsl.law,
27 ssanchez@fsl.law;jwilson@fsl.law;23648@notices.nextchapterbk.com
- 28 • **Matthew Sirolly** msirolly@dir.ca.gov
- **Michael R Totaro** Ocbkatty@aol.com
- **United States Trustee** ustp.region15@usdoj.gov

22 All other interested parties in this action that are not a registered ECF User
23 are served as follows:

24 **X** **by U.S. FIRST CLASS MAIL SERVICE, POSTAGE PREPAID**, by
25 placing a true and correct copy thereof in a sealed envelope in the United States
26 Mail, first class, postage prepaid, and/or with an overnight mail service.

1 Haeji Hong, Esq.
2 United States Trustee
3 Office of the U.S. Trustee
4 880 Front Street, Suite 3230
5 San Diego, CA 92101
6 ***Office of the United States Trustee and Request for Special Notice***
7 ***Via U.S. Mail – Postage Paid***

8 Dale Fullerton
9 30002 Chihuahua Valley
10 Warner Springs, CA 92086
11 ***Special Notice Creditor***
12 ***Via U.S. Mail – Postage Paid***

13 Margie Mannex
14 1755 Lilac Rd.
15 Ramona, CA 92065
16 ***Special Notice Creditor***
17 ***Via U.S. Mail – Postage Paid***

18 I declare under penalty of perjury under the laws of the United States that
19 the foregoing is true and correct.

20 Executed March 26, 2026, at Litchfield Park, Arizona.

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/s/ Candi Collins
Candi Collins