## KELLER BENVENUTTI KIM LLP 1 TOBIAS S. KELLER (Cal. Bar No. 151445) (tkeller@kbkllp.com) DAVID A. TAYLOR (Cal. Bar No. 247433) (dtaylor@kbkllp.com) THOMAS B. RUPP (Cal. Bar No. 278041) (trupp@kbkllp.com) 425 Market Street, 26th Floor San Francisco, California 94105 Telephone: (415) 496-6723 Facsimile: (650) 636-9251 Proposed Attorneys for the Debtors and Debtors in Possession UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA SANTA ROSA DIVISION Lead Case No. 24-10545 (CN) In re: (Jointly Administered) LEFEVER MATTSON, a California Chapter 11 corporation, et al., 1 OMNIBUS NOTICE OF FINAL HEARING Debtors. ON DEBTORS' FIRST DAY MOTIONS **Date:** October 15, 2024 **Time:** 1:30 p.m. (Pacific Time) Place: (Tele/Videoconference **Appearances Only)** United States Bankruptcy Court 450 Golden Gate Avenue Courtroom 17, 16th Floor San Francisco, CA 94102 Response Deadline: October 8, 2024 25 The last four digits of LeFever Mattson's tax identification number are 7537. Due to the 26 large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list 27 of such information may be obtained on the website of the Debtors' claims and noticing agent at https://veritaglobal.net/LM. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, 28 Citrus Heights, CA 95621.

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TO: THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, CREDITORS LISTED ON THE DEBTORS' CONSOLIDATED LIST OF TOP 30 UNSECURED CREDITORS WHO ARE NOT INSIDERS, CREDITORS LISTED ON THE WINDSCAPE APARTMENTS, LLC, LIST OF TOP 20 UNSECURED CREDITORS WHO ARE NOT INSIDERS, THE SECURED LENDERS, AND OTHER PARTIES IN INTEREST:

**PLEASE TAKE NOTICE** that on August 6, 2024, Windscape Apartments, LLC filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code ("the <u>Bankruptcy Code</u>") with the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the "<u>Bankruptcy Court</u>").

PLEASE TAKE FURTHER NOTICE that on September 12, 2024 (the "<u>Petition Date</u>"), LeFever Mattson, a California corporation, and certain affiliates (collectively, with Windscape Apartments, LLC, the "<u>Debtors</u>") filed their voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors' bankruptcy cases (the "<u>Chapter 11 Cases</u>") are being jointly administered for procedural purposes only.

**PLEASE TAKE FURTHER NOTICE** that, at hearings held on August 23, 2024, and September 18, 2024, the Bankruptcy Court heard the motions listed below (the "<u>First Day</u> Motions") and granted certain interim relief requested by the Debtors therein.

- **A.** "<u>Cash Collateral Motion</u>." Motion of Debtors for Interim and Final Orders Authorizing Debtors to Use Cash Collateral [Docket No. 17].
- **B.** "<u>Cash Management Motion</u>." Motion of Debtors for Interim and Final Orders (I) Approving Continued Use of the Debtors' Cash Management System and Bank Accounts; (II) Authorizing the Debtors to Open and Close Bank Accounts; and (III) Authorizing Banks to Honor Certain Prepetition Transfers [Docket No. 13].
- C. "Employee Wages and Benefits Motion." Motion of Debtors for Interim and Final Orders Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Benefits, and Related Items; and (B) Continue Certain Employee Compensation and Benefit Programs in the Ordinary Course [Docket No. 16].
- **D.** "<u>Insurance Motion</u>." Motion of Debtors for Interim and Final Orders Authorizing the Debtors to Maintain Insurance Programs and Pay Obligations with Respect Thereto [Docket No. 14].
- **E.** "<u>Tax Motion</u>." Motion of Debtors for Interim and Final Orders Authorizing Payment of Certain Prepetition Taxes and Assessments and Granting Related Relief [Docket No. 15].
- **F.** "<u>Utilities Motion</u>." Motion of Debtors for Interim and Final Orders Establishing Adequate Assurance Procedures with Respect to the Debtors' Utility Providers [Docket No. 12].
- **G.** "Windscape Cash Collateral Motion." Motion of Debtor for an Order Authorizing the Use of Cash Collateral on an Interim Basis [Case No. 24-10417, Docket No. 22]

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H. "Windscape Cash Management Motion." Motion of Debtor for Interim Order Approving Continued Use of Cash Management System, Bank Account, and Business Forms [Case No. 24-10417, Docket No. 23]

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a final hearing on the First Day Motions (the "Final Hearing") for October 15, 2024, at 1:30 p.m. (Pacific Time), before the Honorable Dennis Montali, United States Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that, pursuant to the *Procedures for Noticing and* Conducting Hearings in the San Francisco Division of the United States Bankruptcy Court for the Northern District of California (effective September 1, 2023), the hearing shall be conducted by video or teleconference, and the Courtroom will be closed. The Bankruptcy Court's website provides information regarding how to arrange an appearance at a video or telephonic hearing. If you have questions about how to participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website at www.canb.uscourts.gov.

PLEASE TAKE FURTHER NOTICE that any opposition or response to the First Day Motions shall be filed with the Bankruptcy Court and served on proposed counsel for the Debtors at the above-referenced address no later than October 8, 2024.

PLEASE TAKE FURTHER NOTICE that a copy of the First Day Motions and their supporting documents can be viewed and/or obtained by: (i) accessing the Bankruptcy Court's website at http://www.canb.uscourts.gov, (ii) contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' claims and noticing agent, KCC dba Verita Global, at the following web address: https://www.veritaglobal.net/LM, or by calling (877) 709-4751 (toll free) for U.S. and Canada-based parties; or (424) 236-7231 for International parties or by e-mail at: www.veritaglobal.net/lm/inquiry. Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

Dated: September 24, 2024 KELLER BENVENUTTI KIM LLP

> By: /s/ Thomas B. Rupp Thomas B. Rupp

Proposed Attorneys for the Debtors and Debtors in Possession

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