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12 *Proposed Attorneys for the Debtors and*  
13 *Debtors in Possession*

14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SANTA ROSA DIVISION**

17 In re:

18 LEFEVER MATTSON, a California  
19 corporation, *et al.*,<sup>1</sup>

20 Debtors.

21 Lead Case No. \_\_ - \_\_\_\_ (CN)

22 (Joint Administration Requested)

23 Chapter 11

24 **APPLICATION OF DEBTORS**  
25 **PURSUANT TO B.L.R. 4002-1 FOR**  
26 **ORDER APPOINTING BRADLEY D.**  
27 **SHARP AS RESPONSIBLE**  
28 **INDIVIDUAL**

[No Hearing Requested]

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. Due to the 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 of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.



1 LeFever Mattson, a California corporation, and certain of its affiliates that are debtors and  
2 debtors in possession (the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11  
3 Cases”), hereby submit this Application (the “Application”) pursuant to Rule 4002-1 of the  
4 Bankruptcy Local Rules for the Northern District of California for the entry of an order appointing  
5 Bradley D. Sharp as the individual with primary responsibility for the duties and obligations of  
6 each of the Debtors during the Chapter 11 Cases (the “Responsible Individual”).<sup>2</sup>

7 Mr. Sharp is the President and Chief Executive Officer of Development Specialists, Inc.  
8 (“DSI”), a leading provider of management consulting and financial advisory services and serves  
9 as the Chief Restructuring Officer of the Debtors.<sup>3</sup> As such, Mr. Sharp is generally familiar with  
10 the day-to-day operations of all the Debtors and their affairs, books, and records.

11 Mr. Sharp’s contact information is:

12 Bradley D. Sharp  
13 President & CEO  
14 DSI Consulting  
15 333 South Grand Avenue, Suite 4100  
16 Los Angeles, CA 90071  
17 Phone: (213) 617-2717

18 A proposed form of order granting the relief requested herein is attached hereto as  
19 **Exhibit A.**

20 **WHEREFORE,** the Debtors respectfully request that the Court enter an order,  
21 substantially in the form attached hereto as **Exhibit A,** granting the relief requested herein.

22 Dated: September 12, 2024

**KELLER BENVENUTTI KIM LLP**

23 By: /s/ Thomas B. Rupp

24 Thomas B. Rupp

*Proposed Attorneys for the Debtors and  
25 Debtors in Possession*

26 <sup>2</sup> With respect to Debtor Windscape Apartments, LLC, this Application seeks to substitute  
27 Mr. Sharp as the new Responsible Individual to replace Timothy LeFever pursuant to  
28 B.L.R. 4002-1(b).

<sup>3</sup> A motion to retain and employ Mr. Sharp pursuant to section 363 of the Bankruptcy Code  
is forthcoming.

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**Exhibit A**  
**(Proposed Order)**

1 **KELLER BENVENUTTI KIM LLP**  
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22 (Jointly Administered)

23 Chapter 11

24 **[PROPOSED] ORDER PURSUANT TO**  
25 **B.L.R. 4002-1 APPOINTING**  
26 **BRADLEY D. SHARP AS**  
27 **RESPONSIBLE INDIVIDUAL**

28 [No Hearing Requested]

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. Due to the 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 of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

