

KELLER BENVENUTTI KIM LLP  
425 MARKET STREET, 26TH FLOOR  
SAN FRANCISCO, CALIFORNIA 94105

**KELLER BENVENUTTI KIM LLP**  
TOBIAS S. KELLER (Cal. Bar No. 151445)  
(tkeller@kbbkllp.com)  
DAVID A. TAYLOR (Cal. Bar No. 247433)  
(dtaylor@kbbkllp.com)  
THOMAS B. RUPP (Cal. Bar No. 278041)  
(trupp@kbbkllp.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**

In re:

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

Debtors.

Lead Case No. 24-10545 (CN)

(Joint Administration Requested)

Chapter 11

**NOTICE OF HEARING ON FIRST DAY  
MOTIONS**

**Date:** September 18, 2024

**Time:** 2:00 p.m. (Pacific Time)

**Place:** United States Bankruptcy Court  
1300 Clay Street, Courtroom 215  
Oakland, CA 94612

**Response Deadline:**

September 18, 2024, at 10:00 a.m. (Pacific Time)

<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.



**TO: THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, THE TOP 30 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 Bankruptcy Code”) with the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that on September 12, 2024 (the “Petition Date”), LeFever Mattson and certain affiliates (collectively, with Windscape Apartments, LLC, the “Debtors”) filed their voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the *Order Pursuant to B.L.R. 9006-1 Shortening Time for Hearing on First Day Motions*, entered on September 16, 2024 [Dkt. No. 23] (the “Order Shortening Time”) the Bankruptcy Court has scheduled a hearing (the “First Day Hearing”) for **September 18, 2024, at 2:00 p.m. (Pacific Time)**, before the Honorable Charles Novack, United States Bankruptcy Judge, in Courtroom 215, United States Bankruptcy Court, 1300 Clay Street, Oakland, California, 94612.

**PLEASE TAKE FURTHER NOTICE** that counsel, parties, and other interested parties may attend in person in Courtroom 215 in Oakland, by Zoom video, or by Zoom telephone. Additional information is available on Judge Novack’s Procedures page on the Bankruptcy Court’s website, and information on how to attend the hearing by Zoom will be included with each calendar posted under Judge Novack’s Calendar on the Bankruptcy Court’s website. If you have questions about how to participate in a video or telephonic hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the “Helpdesk Chat” feature on the Bankruptcy Court’s website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov).

**PLEASE TAKE FURTHER NOTICE** that, at the First Day Hearing, the Court will hear the motions filed by the Debtors and listed in the proposed agenda below (the “First Day Motions”).

**AGENDA FOR FIRST DAY HEARING ON SEPTEMBER 18, 2024, AT 2:00 P.M.**

- A. **“Joint Administration Motion.”** Motion of Debtors for Entry of an Order (I) Directing the Joint Administration of the Debtors’ Chapter 11 Cases and (II) Granting Certain Related Relief [Docket No. 6].
- B. **“Creditor Matrix and Notice of Commencement Motion.”** Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (B) File a Consolidated List of the Debtors’ Thirty Largest Unsecured Creditors; (II) Implementing Certain Procedures for the Notice of Commencement; and (III) Granting Related Relief [Docket No. 9].
- C. **“Motion to Extend Time to File Schedules and Statements.”** Motion of Debtors for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 10].
- D. **“Application to Appoint Claims Agent.”** Application of Debtors for Order (I) Authorizing and Approving the Appointment of Kurtzman Carson Consultants,

LLC dba Verita Global as Claims and Noticing Agent, and (II) Granting Related Relief [Docket No. 7].

E. **“Cash Collateral Motion.”** Motion of Debtors for Interim and Final Orders Authorizing Debtors to Use Cash Collateral [Docket No. 17].

F. **“Cash Management Motion.”** 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].

G. **“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].

H. **“Insurance Motion.”** Motion of Debtors for Interim and Final Orders Authorizing the Debtors to Maintain Insurance Programs and Pay Obligations with Respect Thereto [Docket No. 14].

I. **“Tax Motion.”** Motion of Debtors for Interim and Final Orders Authorizing Payment of Certain Prepetition Taxes and Assessments and Granting Related Relief [Docket No. 15].

J. **“Utilities Motion.”** Motion of Debtors for Interim and Final Orders Establishing Adequate Assurance Procedures with Respect to the Debtors’ Utility Providers [Docket No. 12].

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Order Shortening Time, any opposition or response to the First Day Motions shall be filed with the Bankruptcy Court and served on proposed counsel for the Debtors by electronic mail at the above-referenced address no later than **September 18, 2024, at 10:00 a.m. (Pacific Time)**.

**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’ proposed 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](mailto:www.veritaglobal.net/lm/inquiry). Note that a PACER password is needed to access documents on the Bankruptcy Court’s website.

Dated: September 16, 2024

**KELLER BENVENUTTI KIM LLP**

By: /s/ Thomas B. Rupp

Thomas B. Rupp

*Proposed Attorneys for the Debtors and Debtors in Possession*