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 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)

(Jointly Administered)

Chapter 11

**STIPULATION REGARDING EX PARTE  
 APPLICATION OF KS MATTSON  
 PARTNERS, LP FOR ORDER DIRECTING  
 PRODUCTION OF RECORDS OF HOME  
 TAX SERVICE OF AMERICA, INC.  
 PURSUANT TO FEDERAL RULE OF  
 BANKRUPTCY PROCEDURE 2004**

**[Related to Dkt. No. 986]**

[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' 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 This stipulation (the “Stipulation”) is made by and between Home Tax Service of  
2 America, Inc, d/b/a LeFever Mattson Property Management (“LMPM”), one of the Debtors in  
3 the above captioned chapter 11 cases (the “Chapter 11 Cases”), and KS Mattson Partners, LP  
4 (“KSMP,” and together with LMPM, the “Parties”), in reference to and in consideration of the  
5 following:

6 **RECITALS**

7 A. On March 6, 2025, KSMP filed an *Ex Parte Application for Order Directing*  
8 *Production of Records of Home Tax Service of America, Inc. Pursuant to Federal Rule of*  
9 *Bankruptcy Procedure 2004* [Dkt. No. 986] (the “Application”).

10 B. On March 14, 2025, the Bankruptcy Court held a hearing on the Application, at  
11 which the Court directed the parties to meet and confer regarding the scope of the Application.

12 C. The Parties met and conferred and have come to an agreement under which  
13 LMPM will produce certain agreed-upon categories of documents to KSMP, and KSMP will  
14 withdraw (without prejudice) those portions of the Application that pertain to document  
15 production.

16 D. However, the Parties have been unable to agree regarding the LMPM witness  
17 examination requested in the Rule 2004 Application. Accordingly, and consistent with the  
18 protocol set forth by the Bankruptcy Court, LMPM will submit a letter to the Bankruptcy Court,  
19 of no more than 10 pages, setting forth its position that the request for testimony is inappropriate.  
20 Home Tax anticipates being able to file the letter no later than March 28, 2025.

21 ///

22 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
23 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
24 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
25 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THAT THE**  
26 **BANKRUPTCY COURT ORDER THAT:**

27 1. LMPM will produce to KSMP copies of all non-privileged documents that the  
28 Debtors have formally produced to the Official Committee of Unsecured Creditors in the

Chapter 11 Cases, as of the date of this Stipulation.

2. KSMP hereby withdraws (without prejudice) those portions of the Application that pertain to document production.

3. This Stipulation and any Order approving the terms of this Stipulation shall be binding on any subsequently appointed trustee in this bankruptcy case.

4. In the event of a dismissal of this bankruptcy case, this Stipulation and any Order approving the terms of this Stipulation shall survive and remain in full force and effect.

5. This Stipulation shall constitute the entire agreement and understanding of the Parties relating to the subject matter hereof and supersede all prior agreements and understandings relating to the subject matter hereof.

6. The Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

March 26, 2025

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FENNEMORE

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