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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re:

LEFEVER MATTSON, a California
 corporation, *et al.*,¹

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**STIPULATION TO CONTINUE HEARINGS
 ON (A) MOTION OF DEBTORS TO
 ESTABLISH PROCEDURES FOR REAL
 PROPERTY SALES (SOCOTRA
 COLLATERAL); AND (B) MOTION OF
 DEBTORS FOR ORDER (I) AUTHORIZING
 CERTAIN DEBTORS TO ENTER INTO
 POST-PETITION INTERCOMPANY
 AGREEMENT WITH PINEAPPLE BEAR;
 (II) GRANTING ADMINISTRATIVE
 EXPENSE CLAIMS; AND (III) GRANTING
 RELATED RELIEF**

[Related to Dkt. Nos. 1158 & 1161]

[No hearing requested]

¹ 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 to continue a hearing (the “Stipulation”) is made by and between LeFever
2 Mattson, a California corporation, and certain of its affiliates who are debtors and debtors in
3 possession (collectively, the “Debtors”) in the above captioned chapter 11 cases (the “Chapter 11
4 Cases”); and Socotra Capital, Inc., on behalf of itself and any of its affiliates as lender and/or
5 servicer (“Socotra” and together with the Debtors, the “Parties”), in reference to and consideration
6 of the following:

7 **RECITALS**

8 A. On March 26, 2025, the Debtors filed their *Motion of Debtors to Establish*
9 *Procedures for Real Property Sales (Socotra Collateral)* [Dkt. No. 1158] (the “Sale Procedures
10 Motion”).

11 B. Also on March 26, 2025, the Debtors filed their *Motion of Debtors for Order*
12 *(I) Authorizing Certain Debtors to Enter into Post-Petition Intercompany Agreement with*
13 *Pineapple Bear; (II) Granting Administrative Expense Claims; and (III) Granting Related Relief*
14 [Dkt. No. 1161] (the “Pineapple Bear Motion” and jointly with the Sale Procedures Motion, the
15 “Motions”).

16 C. The Motions are currently set for hearing on April 16, 2025, at 11:00 a.m. (Pacific
17 Time) (the “Hearing”).

18 D. The Sale Procedures Motion seeks approval of procedures for streamlined sales of
19 the Debtors’ properties serving as collateral for Socotra’s loans.

20 E. The Pineapple Bear Motion seeks an order (i) authorizing LeFever Mattson and the
21 Pineapple Bear Debtors to enter into the Pineapple Bear Agreement and (ii) providing that the
22 Pineapple Bear Agreement shall govern the allowance of administrative claims of LeFever
23 Mattson against the Pineapple Bear Debtors.

24 F. On April 9, 2025, Socotra filed its *Socotra Capital, Inc.’s Limited Objection and*
25 *Reservation of Rights with Respect to Motion of Debtors to Establish Procedures for Real Property*
26 *Sales (Socotra Collateral)* [Dkt. No. 1242] (the “Socotra Objection”) in response to the Sale
27 Procedures Motion.
28

1 G. Also on April 9, 2025, Socotra filed its *Socotra Capital, Inc.'s Response and*
2 *Reservation of Rights with Respect to Motion of Debtors for Order (I) Authorizing Certain Debtors*
3 *to Enter into Post-Petition Intercompany Agreement with Pineapple Bear; (II) Granting*
4 *Administrative Expense Claims; and (III) Granting Related Relief* [Dkt. 1243] in response to the
5 Pineapple Bear Motion.

6 H. The Parties have reached a resolution with respect to Socotra's response to the
7 Pineapple Bear Motion and have modified the proposed order accordingly. On April 10, 2025, the
8 Debtors filed their *Notice of Revised Proposed Order (I) Authorizing Certain Debtors to Enter*
9 *into Post-Petition Intercompany Agreement with Pineapple Bear; (II) Granting Administrative*
10 *Expense Claims; and (III) Granting Related Relief* [Dkt. No. 1252].

11 I. The Parties wish to continue the Hearing to allow them to (i) discuss a consensual
12 resolution of the Sale Procedures Motion and (ii) consolidate the Hearing to a day when other
13 matters in these Chapter 11 Cases are also on calendar.

14 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
15 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
16 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
17 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THAT THE BANKRUPTCY**
18 **COURT ORDER THAT:**

19 1. The Hearing on the Motions shall be continued to April 18, 2025, at 11:00 a.m.
20 (Pacific Time).

21 2. If necessary, any reply to the Socotra Objection shall be filed no later than April
22 17, 2025, at 12:00 p.m. (Pacific Time).

23 3. All arguments, rights, and claims of the Parties are expressly preserved.

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

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

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April 14, 2025

KELLER BENVENUTTI KIM LLP

By: /s/ Gabrielle L. Albert
Gabrielle L. Albert
Attorneys for the Debtors and Debtors in Possession

April 14, 2025

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