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8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SANTA ROSA DIVISION**

11 In re:
12 LEFEVER MATTSON, a California
13 corporation, *et al.*,¹
14 Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**STIPULATION TO FURTHER
CONTINUE HEARING ON MOTION OF
DEBTORS TO ESTABLISH
PROCEDURES FOR REAL PROPERTY
SALES (SOCOTRA COLLATERAL)**

[Related to Dkt. No. 1158]

[No hearing requested]

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26 ¹ The last four digits of LeFever Mattson’s tax identification number are 7537. Due to the
27 large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the
28 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 “Motion”).

10 B. The Motion seeks approval of procedures for streamlined sales of the Debtors’
11 properties serving as collateral for Socotra’s loans.

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

15 D. After the Objection was filed, the Parties initiated settlement discussions in hopes
16 of reaching a consensual resolution of the Motion.

17 E. On April 14, 2025, the Parties filed a stipulation to continue the hearing on the
18 Motion (the “Hearing”) from April 16, 2025, at 11:00 a.m. (Pacific Time) to April 18, 2025, at
19 11:00 a.m. (Pacific Time) [Dkt. No. 1261] allowing them more time for negotiations. The Court
20 approved the continuance by order entered on April 14, 2025 [Dkt. No. 1262].

21 F. The Parties have made progress in their settlement discussions but require
22 additional time to find a mutually agreeable solution. Therefore, they wish to further continue the
23 Hearing.

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1 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
2 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
3 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
4 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THAT THE BANKRUPTCY**
5 **COURT ORDER THAT:**

6 1. The Hearing on the Motion shall be further continued to April 25, 2025, at 11:00
7 a.m. (Pacific Time).

8 2. If necessary, any reply to the Objection shall be filed no later than April 24, 2025,
9 at 12:00 p.m. (Pacific Time).

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

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

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

16
17 April 16, 2025

KELLER BENVENUTTI KIM LLP

18
19 By: /s/ Gabrielle L. Albert

Gabrielle L. Albert

20 *Attorneys for the Debtors and Debtors in
Possession*

21
22 April 16, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON
LLP

23
24 By: /s/ Theodore A. Cohen

Theodore A. Cohen

25 *Attorneys for Socotra Capital, Inc.*
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