

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

1 **KELLER BENVENUTTI KIM LLP**  
2 TOBIAS S. KELLER (Cal. Bar No. 151445)  
3 (tkeller@kbbkllp.com)  
4 DAVID A. TAYLOR (Cal. Bar No. 247433)  
5 (dtaylor@kbbkllp.com)  
6 THOMAS B. RUPP (Cal. Bar No. 278041)  
7 (trupp@kbbkllp.com)  
8 425 Market Street, 26th Floor  
9 San Francisco, California 94105  
10 Telephone: (415) 496-6723  
11 Facsimile: (650) 636-9251

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

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

12 In re:  
13  
14 LEFEVER MATTSON, a California  
15 corporation, *et al.*,<sup>1</sup>  
16 Debtors.

Lead Case No. 24-10545 (CN)

Chapter 11 (Jointly Administered)

**NOTICE OF ERRATA REGARDING  
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. No. 1161]

**Date:** April 18, 2025

**Time:** 11:00 a.m.

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

17  
18  
19  
20  
21  
22  
23  
24  
25  
26 <sup>1</sup> 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 On March 26, 2025, LeFever Mattson, a California corporation (“LeFever Mattson”), and  
2 certain of its affiliates that are debtors and debtors in possession (the “Debtors”) in the above-  
3 captioned chapter 11 cases (the “Chapter 11 Cases”) filed the *Motion of Debtors for Order*  
4 *(I) Authorizing Certain Debtors to Enter Into Post-Petition Intercompany Agreement with*  
5 *Pineapple Bear; (II) Granting Administrative Expense Claims; and (III) Granting Related Relief*  
6 [Dkt. No. 1161] (the “Motion”).<sup>2</sup> The Motion is set for hearing on April 18, 2025.

7 On April 15, 2025, the Debtors filed the *Periodic Report Regarding Value, Operations,*  
8 *and Profitability of Entities in Which the Debtor’s Estate Holds a Substantial or Controlling*  
9 *Interest* [Dkt. No. 1273] (the “Periodic Report”). While preparing the Periodic Report, the Debtors  
10 discovered an error in the Motion at page 5:12-13, where it stated that “[b]etween the Petition Date  
11 and the filing of this Motion, LeFever Mattson has advanced \$892,000 to support the operations  
12 of Pineapple Bear.” This figure is incorrect; it is approximately the amount advanced between the  
13 approval of the DIP Facility in December 2024 and the filing of the Motion.<sup>3</sup> As stated in the List  
14 of Assets and Liabilities for Pineapple Bear attached as Exhibit A-1 to the Periodic Report, the  
15 amount of funds advanced by LeFever Mattson to support Pineapple Bear’s operations between  
16 October 2024 and March 2025 is \$1,573,307.00 [Dkt. No. 1273-1]. This represents all of the  
17 amounts advanced from LeFever Mattson to Pineapple Bear between the Petition Date and the  
18 filing of the Motion.

19  
20 Dated: April 16, 2025

**KELLER BENVENUTTI KIM LLP**

By: /s/ Thomas B. Rupp

Thomas B. Rupp

*Attorneys for the Debtors and Debtors in Possession*

25  
26 <sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Motion.

27 <sup>3</sup> This same error appears in ¶ 21 of the Sharp Declaration filed in support of the Motion.  
28 The Debtors believe this fact is not dispositive of the Motion, however they are prepared to file an amended declaration should the Court require it to grant the relief requested.