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18 **UNITED STATES BANKRUPTCY COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SANTA ROSA DIVISION**

21 In re:  
22  
23 LEFEVER MATTSON, a California  
24 corporation, *et al.*,<sup>1</sup>  
25 Debtors.

26 Case No.: 24-10545  
27 (Jointly Administered)  
28 Chapter 11

**SECOND EX PARTE APPLICATION OF  
THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR ENTRY  
OF AN ORDER PURSUANT TO  
BANKRUPTCY RULE 2004  
AUTHORIZING PRODUCTION OF  
DOCUMENTS BY SELECT PORTFOLIO  
SERVICING, INC.; DECLARATION OF  
STEVEN W. GOLDEN, ESQ.**

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1 The Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-  
2 captioned chapter 11 bankruptcy cases (the “Cases”) hereby files this second *ex parte* application  
3 (the “Application”) under Federal Rule of Bankruptcy Procedure 2004 (“Rule 2004”) and Local  
4 Bankruptcy Rule 2004-1 (“Local Rule 2004-1”) for entry of an order authorizing the Committee to  
5 issue a subpoena to Select Portfolio Servicing, Inc. (“Select Portfolio”).

6 The Committee’s proposed subpoena will provide that Select Portfolio shall complete its  
7 production, by **May 10, 2025**, of documents responsive to the Request for Production (the “Request”)  
8 set forth substantially in the form attached hereto as **Exhibit 1**.

### 9 I. PRELIMINARY STATEMENT

10 In furtherance of the Debtors’ ongoing marketing and potential sale of their owned real  
11 properties, the Committee, the Debtors, and their advisors, including FTI Consulting, Inc.(the  
12 Debtors’ and Committee’s Real Estate Advisor), are working to understand the asserted payoff  
13 amounts related to the various mortgages that encumber the properties that may be sold by the  
14 Debtors. To that end, the Committee requested that each of the lenders (the “Lenders”) under the  
15 loans to which the Debtors are a party and/or encumber property in which the Debtors hold or held  
16 an interest (the “Loans”) provide detailed payoff quotes for each of their Loans (“Payoff Quotes”) to  
17 allow for the Debtors and the Committee to fully understand the economics of each potential sale  
18 transaction. Select Portfolio, a Lender and/or servicer of certain Loans, requested that the  
19 Committee obtain a subpoena prior to providing the requested information. Accordingly, the  
20 Committee seeks to propound the Request to obtain Select Portfolio’s Payoff Quotes, which are  
21 essential to the Committee’s and Debtors’ understanding of the Debtors’ assets, secured claims,  
22 encumbrances on real property, and ultimately, the potential value of property of the Debtors’ estates  
23 available to the general unsecured creditors and to resolution of these Cases.

### 24 II. FACTUAL BACKGROUND

25 Over the course of two months in 2024,<sup>2</sup> each of the Debtors filed a voluntary petition for  
26 relief in this Court under chapter 11 of the Bankruptcy Code. The United States Trustee appointed  
27 \_\_\_\_\_

28 <sup>2</sup> The Debtors filed bankruptcy petitions on August 6, 2024; September 12, 2024; and October 2, 2024 (collectively, the  
“Petition Dates”).

1 the Committee on October 9, 2024.<sup>3</sup> On November 1, 2024, the Court granted the Committee’s  
2 application to employ Pachulski Stang Ziehl & Jones LLP as its counsel, effective as of October 13,  
3 2024.<sup>4</sup>

4 **III. JURISDICTION**

5 This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157  
6 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this  
7 Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein  
8 are §§ 1103 and 1109(b) of the Bankruptcy Code, and Rule 2004.

9 **IV. RELIEF REQUESTED**

10 The Committee respectfully requests that the Court enter an *ex parte* order authorizing the  
11 Committee to issue a subpoena requiring Select Portfolio to complete its production, by **May 10,**  
12 **2025**, of documents responsive to the Request set forth substantially in the form attached hereto as  
13 **Exhibit 1.**

14 **IV. BASIS FOR RELIEF**

15 Local Rule 2004-1 provides as follows: “The Clerk may issue on behalf of the Court, *ex*  
16 *parte* and without notice, orders granting applications for examination of an entity pursuant to  
17 Bankruptcy Rule 2004(a).”<sup>5</sup> The Committee brings this Application *ex parte* pursuant to Local Rule  
18 2004-1 seeking an order without need for a hearing. The Committee understands that Select Portfolio  
19 reserves the right to interpose objections to the underlying document requests after the issuance of the  
20 subpoena. However, objections to the underlying document requests are not grounds to oppose or  
21 delay the granting of this Application.

22 Rule 2004(a) provides that “[o]n motion of any party in interest, the court may order the  
23 examination of any entity.”<sup>6</sup> Rule 2004 is primarily used for “revealing the nature and extent of the  
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25 <sup>3</sup> See Docket No. 135.

26 <sup>4</sup> See Docket No. 250.

27 <sup>5</sup> L.B.R. 2004-1(a).

28 <sup>6</sup> Fed. R. Civ. P. 2004(a).

1 bankruptcy estate, and for discovering assets, examining transactions, and determining whether  
2 wrongdoing has occurred.”<sup>7</sup>

3 Pursuant to Rule 2004(b), a party in interest may seek both document and oral discovery  
4 related to “acts, conduct, or property or to the liabilities and financial condition of the debtor, or to  
5 any matter which may affect the administration of the debtor’s estate, or to the debtor’s right to a  
6 discharge.”<sup>8</sup> Under Rule 2004(c), the “attendance of an entity for examination and for the production  
7 of documents . . . may be compelled as provided in Rule 9016 for the attendance of a witness at a  
8 hearing or trial.”<sup>9</sup> Federal Rule of Bankruptcy Procedure (“Bankruptcy Rule”) 9016 makes Rule 45 of  
9 the Federal Rules of Civil Procedure (governing subpoenas) applicable in cases under the Bankruptcy  
10 Code. Unlike discovery under the Federal Rules of Civil Procedure (the “Civil Rules”), discovery  
11 under Rule 2004 can be a “pre-litigation discovery device.”<sup>10</sup> As such, a Rule 2004 motion need not  
12 be tied to specific factual allegations at issue between parties.<sup>11</sup> Moreover, the scope of a Rule 2004  
13 oral examination is broader than that of discovery under the Civil Rules or the Bankruptcy Rules  
14 governing adversary proceedings.<sup>12</sup> In fact, courts have recognized that Rule 2004 examinations may  
15 be “broad” and “unfettered,” and can legitimately be in the nature of a “fishing expedition.”<sup>13</sup>

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18 <sup>7</sup> *In re Kelton*, 389 B.R. 812, 820 (Bankr. S.D. Ga. 2008); *see also In re Lufkin*, 255 B.R. 204, 208 (Bankr. E.D. Tenn.  
19 2000) (purpose of Rule 2004 is to “determine the condition, extent, and location of the debtor’s estate in order to  
20 maximize distribution to unsecured creditors”); *In re Bennett Funding Grp., Inc.*, 203 B.R. 24, 28 (Bankr. N.D.N.Y. 1996)  
(purpose of Rule 2004 is to assist in “revealing the nature and extent of the estate, and to discover assets of the debtor  
which may have been intentionally or unintentionally concealed”).

21 <sup>8</sup> Fed. R. Civ. P. 2004(b).

22 <sup>9</sup> Fed. R. Civ. P. 2004(c).

23 <sup>10</sup> *In re Wilson*, 413 B.R. 330, 336 (Bankr. E.D. La. 2009).

24 <sup>11</sup> *In re Symington*, 209 B.R. 678, 683 (Bankr. D. Md. 1997) (Bankruptcy Rule 2004 permits “examination of any party  
without the requirement of a pending adversary proceeding or contested matter”).

25 <sup>12</sup> *In re Ecam Publ’ns, Inc.*, 131 B.R. 556, 559 (Bankr. S.D.N.Y. 1991); *see also In re Drexel Burnham Lambert Grp.,*  
26 *Inc.*, 123 B.R. 702, 711 (Bankr. S.D.N.Y. 1991) (“[T]he scope of a Rule 2004 examination is very broad. Rule 2004  
discovery is broader than discovery under the Federal Rules of Civil Procedure.”).

27 <sup>13</sup> *In re Subpoena Duces Tecum & Ad Testificandum Pursuant to Fed. R. Bankr. P. 2004*, 461 B.R. 823, 829 (Bankr. C.D.  
28 Cal. 2011) (citation omitted); *see also In re Countrywide Home Loans, Inc.*, 384 B.R. 373, 400 (Bankr. W.D. Pa. 2008); *In*  
*re Bennett Funding Grp.*, 203 B.R. at 28 (purpose of Rule 2004 is to assist in “revealing the nature and extent of the estate,

1 Whether to allow the requested discovery rests within the sound discretion of the Court.<sup>14</sup>  
2 Bankruptcy courts may allow a Rule 2004 examination of “third parties who have had dealings with  
3 the debtor,”<sup>15</sup> “to allow inquiry into the debtor’s acts, conduct or financial affairs so as to discover the  
4 existence or location of assets of the estate,”<sup>16</sup> “unearthing frauds,”<sup>17</sup> or to assist in recovering assets  
5 for the benefit of a debtor’s creditors.<sup>18</sup>

6 In addition, section 105(a) of the Bankruptcy Code authorizes the Court to “issue any  
7 order . . . that is necessary or appropriate to carry out the provisions of this title.”<sup>19</sup> The proposed  
8 discovery will, among other things, assist the Committee to fulfill its statutory duty to “investigate the  
9 acts, conduct, assets, liabilities, and financial condition of the debtor.”<sup>20</sup> The relief requested in this  
10 Application will not reduce or expand the substantive rights of any party to object to or modify the  
11 information requested by the Committee.

12 Here, the requested relief is well within the scope of Rule 2004. The Committee seeks to  
13 maximize the amount of creditors’ recoveries in these Cases. As such, the Committee needs the  
14 information from Select Portfolio pertaining to the Payoff Quotes to assist in determining the value of  
15 property of the estate.

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18 and to discover assets of the debtor which may have been intentionally or unintentionally concealed”); *In re Valley Forge*  
19 *Plaza Assocs.*, 109 B.R. 669, 674 (Bankr. E.D. Pa. 1990).

20 <sup>14</sup> See, e.g., *In re Hammond*, 140 B.R. 197, 200 (S.D. Ohio 1992).

21 <sup>15</sup> *In re Fearn*, 96 B.R. 135, 138 (Bankr. S.D. Ohio 1989); see also *In re W&S Invs., Inc.*, No. 91-35830, 1993 U.S. App.  
22 LEXIS 2231, at \*5-6 (9th Cir. Jan. 28, 1993) (unpublished disposition) (Rule 2004 is a “broadly construed discovery  
23 device which permits any party in interest in a bankruptcy proceeding to move for a court order to examine any entity...,”  
24 the “scope of inquiry permitted under a Rule 2004 examination is generally very broad and can ‘legitimately be in the  
25 nature of a ‘fishing expedition.’”) (citation omitted).

26 <sup>16</sup> *In re Dinubilo*, 177 B.R. 932, 940 (E.D. Cal. 1993).

27 <sup>17</sup> *Dynamic Fin. Corp. v. Kipperman (In re N. Plaza, LLC)*, 395 B.R. 113, 122 n.9 (S.D. Cal. 2008) (citations omitted).

28 <sup>18</sup> See *In re Vantage Petroleum Corp.*, 34 B.R. 650, 651 (Bankr. E.D.N.Y. 1983) (allowing discovery under Rule 2004 to  
help the debtor “discover and recover assets for benefit of creditors of the debtor”).

<sup>19</sup> 11 U.S.C. § 105(a).

<sup>20</sup> *Id.* § 1103(c)(2).



**EXHIBIT 1**  
**Request for Production of Documents**

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PACHULSKI STANG ZIEHL & JONES LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO, CALIFORNIA

**EXHIBIT 1**

**Request for Production to Select Portfolio Servicing, Inc.**

**DEFINITIONS**

“ALL” shall be construed as encompassing “EACH” and “ANY”.

“ANY” shall be construed as encompassing “EACH” and “ALL”.

“CHAPTER 11 CASES” means the jointly-administered chapter 11 cases of the DEBTORS, proceeding under the caption *In re LeFever Mattson*, Case No. 24-10545 (Bankr. N.D. Cal.).

“COMMITTEE” means the Official Committee of Unsecured Creditors appointed in the CHAPTER 11 CASES.

“COMMUNICATION” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

“DOCUMENT” is synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS.

“EACH” shall be construed as encompassing “ALL” and “ANY”.

“IDENTIFIED LOAN” means each LOAN identified on the attached **Appendix 1**.

“PAYOFF QUOTE” means a detailed payoff quote for an IDENTIFIED LOAN as of an identified date, setting forth an exact breakdown of principal, accrued interest, prepayment penalty (if any), and other itemized fees with respect to each IDENTIFIED LOAN.

“REQUEST” means the Request for Production set forth below.

“YOU” and “YOUR” means Select Portfolio Servicing, Inc., and its agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.



**INSTRUCTIONS**

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- 3 A. Unless otherwise specified, the REQUEST seeks DOCUMENTS dated or created on and
- 4 after January 1, 2000.
- 5 B. YOUR responses to the REQUEST are subject to ALL applicable Federal Rules of
- 6 Bankruptcy Procedure and this Court's Local Rules.
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- Please bates number EACH page of EACH DOCUMENT that YOU produce.
  - YOU are required to conduct a thorough investigation and produce ALL DOCUMENTS in YOUR possession, custody, and control.
  - In the REQUEST, the use of the singular form of ANY word includes the plural and vice versa. The words "and" and "or" shall both be conjunctive and disjunctive.
  - If YOU are unable to produce DOCUMENTS responsive to ANY REQUEST but DOCUMENTS responsive to the REQUEST exist, provide a written DOCUMENT containing the following information:
    1. The date of the DOCUMENT;
    2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
    3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
    4. The name, address, telephone number and work title of EACH recipient of the DOCUMENT;
    5. The number of pages in the DOCUMENT;
    6. The document control number, if ANY;
    7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has/have possession of the DOCUMENT;
    8. A specific description of the subject matter of the DOCUMENT;
    9. The reason why YOU cannot produce the DOCUMENT.
  - YOU are under a continuing duty to amend YOUR written responses to the REQUEST and to produce additional DOCUMENTS if the written responses or document production is
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1 incomplete or incorrect in ANY material respect, and if the additional or corrective  
2 information has not otherwise been made known to the COMMITTEE.

- 3 • YOU are required to produce the full and complete originals (in native format, if electronic),  
4 or copies if the originals are unavailable, of EACH DOCUMENT responsive to the  
5 REQUEST along with ALL non-identical copies and drafts in their entirety. A copy may be  
6 produced in lieu of originals if the entirety (front and back where appropriate) of the  
7 DOCUMENT is reproduced and YOU state by declaration under penalty of perjury that the  
8 copy provided is a true, correct, complete, and accurate duplication of the original.
- 9 • Produced DOCUMENTS must include ALL exhibits, attachments, and ANY other  
10 DOCUMENTS otherwise appended to another DOCUMENT.
- 11 • For ELECTRONICALLY STORED INFORMATION (“ESI”):
  - 12 1. Produce DOCUMENTS in accordance with the instructions at  
13 [https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-](https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data)  
14 [Processed-Data](https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data)
  - 15 2. Maintain family integrity.
  - 16 3. Perform custodian-level de-duplication.
  - 17 4. Produce a DAT load file with the following metadata fields: Beginning Production  
18 Number, Ending Production Number, Beginning Attachment Number, End  
19 Attachment Number, Family ID, Page Count, Custodian, Original Location Path,  
20 Email Folder Path, Document Type, Doc Author, Doc Last Author, Comments,  
21 Categories, Revisions, File Name, File Size, MD5 Hash, Date Last Modified, Time  
22 Last Modified, Date Created, Time Created, Date Last Accessed, Time Last  
23 Accessed, Date Sent, Time Sent, Date Received, Time Received, To, From, CC,  
24 BCC, Email Subject, Path to Native, Path to Full Text, Original Time Zone.
  - 25 5. Process ESI in Pacific Time Zone and provide a metadata field indicating original time  
26 zone.
    - 27 • If YOU withhold or redact a portion of ANY DOCUMENT under a  
28 claim of privilege or other protection, then the DOCUMENT must be

1 identified on a privilege log, which shall be produced  
2 contemporaneously with the non-privileged DOCUMENTS responsive  
3 to this REQUEST, and which privilege log shall state the following  
4 information:

- 5 6. The date of the DOCUMENT;
- 6 7. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
- 7 8. The name, address, telephone number and title of the author(s) of the DOCUMENT;
- 8 9. The name, address, telephone number and work title of EACH recipient of the  
9 DOCUMENT;
- 10 10. The number of pages in the DOCUMENT;
- 11 11. The document control number, if ANY;
- 12 12. The present location(s) of the DOCUMENT and the name, address and telephone  
13 number of the person(s) who has/have possession, custody, or control of the  
14 DOCUMENT;
- 15 13. A general description of the subject matter of the DOCUMENT or the portion redacted  
16 without disclosing the asserted privileged or protected COMMUNICATION;
- 17 14. The specific privilege(s) or protection(s) that YOU contend applies.

18  
19 **REQUEST FOR PRODUCTION**

20 **REQUEST FOR PRODUCTION NO. 1:** A PAYOFF QUOTE for each IDENTIFIED LOAN,  
21 calculated as if each IDENTIFIED LOAN was sold as of June 1, 2025; July 1, 2025; and August 1,  
22 2025.  
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**Appendix 1**

<b>Primary Lender</b>	<b>Servicer</b>	<b>Borrower(s)</b>	<b>Property(ies)</b>	<b>Loan Date</b>
Chevy Chase Bank, FSB	Select Portfolio Servicing, Inc.	Arnold T. Yee and Ruane T. Hayashi-Yee	5335/5337 Gibbons Dr	1/20/2005
Wells Fargo Bank, National Association, as Trustee for Bear Stearns Asset Backed Securities I LLC, GreenPoint Mortgage Funding Trust 2006- AR1, Mortgage Pass- Through Certificates, Series 2006-AR1 (as successor to GreenPoint Mortgage Funding, Inc.)	Select Portfolio Servicing, Inc.	Ismael Carrillo and Erin Carrillo	5509 Orange Ave; 7343 Arleta Ct	10/3/2005
Wells Fargo Bank, National Association, as Trustee for Bear Stearns Asset Backed Securities I LLC, GreenPoint Mortgage Funding Trust 2006- AR3, Mortgage Pass- Through Certificates, Series 2006-AR3 (as successor to GreenPoint Mortgage Funding, Inc.)	Select Portfolio Servicing, Inc.	Craig R. Coleman and Donna Lynn Coleman	5601/5603 Orange Ave	12/18/2005
Wells Fargo Bank, National Association, as Trustee for Bear Stearns Asset Backed Securities I LLC, GreenPoint Mortgage Funding Trust 2006- AR1, Mortgage Pass- Through Certificates, Series 2006-AR1 (as successor to GreenPoint Mortgage	Select Portfolio Servicing, Inc.	Ismael Carrillo and Erin Carrillo	7303/7305 Berna Way	10/3/2005

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Funding, Inc.)				
Wells Fargo Bank, National Association, as Trustee for Bear Stearns Asset Backed Securities I LLC, GreenPoint Mortgage Funding Trust 2006-AR3, Mortgage Pass-Through Certificates, Series 2006-AR3 (as successor to GreenPoint Mortgage Funding, Inc.)	Select Portfolio Servicing, Inc.	Thomas Fox and Cheryl Fox	7312/7314 Berna Way	12/12/2005
Wells Fargo Bank, National Association, as Trustee for Bear Stearns Asset Backed Securities I LLC, GreenPoint Mortgage Funding Trust 2006-AR1, Mortgage Pass-Through Certificates, Series 2006-AR1 (as successor to GreenPoint Mortgage Funding, Inc.)	Select Portfolio Servicing, Inc.	Jose F. Corrales and Marcela Corrales	7316/7318 Arleta Ct	9/30/2005
U.S. Bank NA, Successor Trustee to Bank of America NA, Successor in Interest to LaSalle Bank NA, as Trustee, on behalf of the holders of the Washington Mutual Mortgage Pass-Through Certificates WMALT Series 2007-OA5 Trust (as successor to First Magnus Financial Corp.)	Select Portfolio Servicing, Inc.	Rick Slyter and Kathy Slyter	7319/7321 Berna Way	12/5/2006
GreenPoint Mortgage Funding, Inc.	Select Portfolio Servicing, Inc.	Thomas Fox and Cheryl Fox	7339/7341 Arleta Ct	12/14/2005

1	The Bank of New	Select	James S.	9120	6/10/2005
2	York Mellon,	Portfolio	Mattson and	Polhemus Dr;	
3	Successor to	Servicing,	Rachel L.	9300	
4	JPMorgan Chase	Inc.	Mattson	Mazatlan Way	
5	Bank, N.A., as				
6	trustee, on behalf of				
7	the holders of the				
8	Structured Asset				
9	Mortgage				
10	Investments II Trust				
11	2005-AR6, Mortgage				
12	Pass-Through				
13	Certificates, Series				
14	2005-AR6 (as				
15	successor to				
16	GreenPoint Mortgage				
17	Funding, Inc.)				
18	JP Morgan Chase	Select	Lisa Michelle	1130 Pear	6/1/2007
19	Bank, N.A. (as	Portfolio	Delong	Tree Ln	
20	successor to	Servicing,			
21	American Brokers	Inc.			
22	Conduit)				
23	Wells Fargo Bank,	Select	Craig R.	533 Bella	8/26/2005
24	National Association,	Portfolio	Coleman and	Vista Dr	
25	as Trustee for	Servicing,	Donna Lynn		
26	Structured Asset	Inc.	Coleman		
27	Mortgage				
28	Investments II Inc.,				
29	GreenPoint Mortgage				
30	Funding Trust 2005-				
31	AR5, Mortgage Pass-				
32	Through Certificates,				
33	Series 2005-AR5 (as				
34	successor to				
35	GreenPoint Mortgage				
36	Funding, Inc.)				

**EXHIBIT 2**  
**Declaration of Steven W. Golden, Esq.**

PACHULSKI STANG ZIEHL & JONES LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO, CALIFORNIA

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1 Debra I. Grassgreen (CA Bar No. 169978)  
2 John D. Fiero (CA Bar No. 136557)  
3 Jason H. Rosell (CA Bar No. 269126)  
4 Steven W. Golden (admitted pro hac vice)  
5 Gillian N. Brown (CA Bar No. 205132)  
6 PACHULSKI STANG ZIEHL & JONES LLP  
7 One Sansome Street, Suite 3430  
8 San Francisco, California 94104-4436  
9 Telephone: 415-263-7000  
10 Facsimile: 415-263-7010  
11 Email: dgrassgreen@pszjlaw.com  
12 jfiero@pszjlaw.com  
13 jrosell@pszjlaw.com  
14 sgolden@pszjlaw.com  
15 gbrown@pszjlaw.com

16 *Counsel to the Official Committee*  
17 *of Unsecured Creditors*

18 **UNITED STATES BANKRUPTCY COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SANTA ROSA DIVISION**

21 In re:

22 LEFEVER MATTSON, a California  
23 corporation, *et al.*,<sup>21</sup>

24 Debtors.

25 Case No.: 24-10545

26 (Jointly Administered)

27 Chapter 11

28 **DECLARATION OF STEVEN W. GOLDEN  
IN SUPPORT OF THE SECOND *EX PARTE*  
APPLICATION OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS FOR ENTRY OF AN ORDER  
PURSUANT TO BANKRUPTCY RULE 2004  
AUTHORIZING ORAL EXAMINATION OF  
AND PRODUCTION OF DOCUMENTS BY  
SELECT PORTFOLIO SERVICING, INC.**

29 \_\_\_\_\_  
30 <sup>21</sup> The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor  
31 entities in the above-captioned chapter 11 cases, a complete list of the Debtors and the last four digits of their federal  
32 tax identification numbers is not provided herein. A complete list of such information may be obtained on the  
33 website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the  
34 Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.



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I, Steven W. Golden, declare under penalty of perjury as follows:

1. I am a partner at the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel to the Official Committee of Unsecured Creditors (“Committee”) in the above-captioned case. My office address and phone number at PSZJ are 919 N. Market Street, 17<sup>th</sup> Floor, Wilmington, DE 19801; (302) 652-4100. I am a member in good standing of the bars of New York, Texas, Maryland, Pennsylvania, and Delaware.

2. On December 2, 2024, this Court entered an order admitting my application for admission pro hac vice in this case. *See* Docket No. 395.

3. I submit this Declaration in support of the SECOND *EX PARTE* APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND PRODUCTION OF DOCUMENTS BY SELECT PORTFOLIO SERVICING, INC. (the “Application”) to which this Declaration is appended. I have personal knowledge of the facts set forth in this Declaration unless otherwise stated.

4. In furtherance of the Debtors’ ongoing marketing and potential sale of their owned real properties, the Committee, the Debtors, and their advisors, including FTI Consulting, Inc., the Debtors’ and Committee’s Real Estate Advisor, are working to understand the asserted payoff amounts related to the various mortgages that encumber the properties that may be sold by the Debtors. To that end, I requested that each of the lenders (the “Lenders”) under the loans to which the Debtors are a party and/or encumber property in which the Debtors hold or held an interest (the “Loans”) provide detailed payoff quotes for each of their Loans (“Payoff Quotes”) to allow for the

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Debtors and the Committee to fully understand the economics of each potential sale transaction. Select Portfolio, a Lender and/or servicer of certain Loans, requested that the Committee obtain a subpoena prior to providing the requested information.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 22, 2025 at Wilmington, Delaware.

By: /s/ Steven W. Golden  
Steven W. Golden

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**EXHIBIT 3**  
**Proposed Form of Order Granting *Ex Parte* Application**

1 Debra I. Grassgreen (CA Bar No. 169978)  
2 John D. Fiero (CA Bar No. 136557)  
3 Jason H. Rosell (CA Bar No. 269126)  
4 Steven W. Golden (*pro hac vice* pending)  
5 Gillian N. Brown (CA Bar No. 205132)  
6 PACHULSKI STANG ZIEHL & JONES LLP  
7 One Sansome Street, Suite 3430  
8 San Francisco, California 94104-4436  
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13 jrosell@pszjlaw.com  
14 sgolden@pszjlaw.com  
15 gbrown@pszjlaw.com

16 *Counsel to the Official Committee*  
17 *of Unsecured Creditors*

18 **UNITED STATES BANKRUPTCY COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SANTA ROSA DIVISION**

21 In re:

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

24 Debtors.

25 Case No.: 24-10545

26 (Jointly Administered)

27 Chapter 11

28 **ORDER GRANTING THE SECOND *EX***  
***PARTE* APPLICATION OF THE OFFICIAL**  
**COMMITTEE OF UNSECURED**  
**CREDITORS FOR ENTRY OF AN ORDER**  
**PURSUANT TO BANKRUPTCY RULE 2004**  
**AUTHORIZING ORAL EXAMINATION OF**  
**AND PRODUCTION OF DOCUMENTS BY**  
**SELECT PORTFOLIO SERVICING, INC.**

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1 Debra I. Grassgreen (CA Bar No. 169978)  
2 John D. Fiero (CA Bar No. 136557)  
3 Jason H. Rosell (CA Bar No. 269126)  
4 Steven W. Golden (admitted pro hac vice)  
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16 *Counsel to the Official Committee*  
17 *of Unsecured Creditors*

18 **UNITED STATES BANKRUPTCY COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SANTA ROSA DIVISION**

21 In re:

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

24 Debtors.

25 Case No.: 24-10545

26 (Jointly Administered)

27 Chapter 11

28 **CERTIFICATE OF SERVICE**

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<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 the above-captioned 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 STATE OF CALIFORNIA )  
2 )  
3 CITY OF LOS ANGELES )

4 I, Maria R. Viramontes, am employed in the city and county of Los Angeles, State of  
5 California. I am over the age of 18 and not a party to the within action; my business address is 10100  
6 Santa Monica Blvd., 13<sup>th</sup> Floor, Los Angeles, California 90067.

7 On April 22, 2025, I caused to be served the **SECOND EX PARTE APPLICATION OF THE**  
8 **OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER**  
9 **PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING PRODUCTION OF**  
10 **DOCUMENTS BY SELECT PORTFOLIO SERVICING, INC.; DECLARATION OF**  
11 **STEVEN W. GOLDEN, ESQ.** in the manner stated below:

12 <input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On April 22, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below. See Attached.
14 <input type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
16 <input checked="" type="checkbox"/>	(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address. Select Portfolio's counsel – <a href="mailto:pfernandez@buchalter.com">pfernandez@buchalter.com</a>

17 I declare under penalty of perjury, under the laws of the State of California and the United  
18 States of America that the foregoing is true and correct.

19 Executed on April 22, 2025, at Los Angeles, California.

20 /s/ Maria R. Viramontes  
21 Maria R. Viramontes

1 **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**

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4917-3538-1049.2 52011.00002

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