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

In re:

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

Case No.: 24-10545 (CN)

(Jointly Administered)

Chapter 11

In re:

KS MATTSON PARTNERS, LP,  
 Debtor.

Case No.: 24-10715 (CN)

Chapter 11

***EX PARTE* MOTION OF THE OFFICIAL  
 COMMITTEE OF UNSECURED  
 CREDITORS FOR LEAVE TO EXCEED  
 THE PAGE LIMITATIONS WITH  
 RESPECT TO ITS MOTION FOR  
 SUBSTANTIVE CONSOLIDATION OF  
 DEBTOR LEFEVER MATTSON AND KS  
 MATTSON PARTNERS, LP**

**[No Hearing Necessary]**

<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 The Official Committee of Unsecured Creditors in the above-captioned case of *In re LeFever*  
2 *Mattson* (the “Committee”) hereby submits this motion (the “Leave Request”), pursuant to Local  
3 Bankruptcy Rule 9013-1(c), for the entry of an order authorizing the Committee to exceed the page  
4 limitation on memoranda of points and authorities from 25 pages to 32 pages with respect to the  
5 *Motion of the Official Committee of Unsecured Creditors for Substantive Consolidation of Debtor*  
6 *Lefever Mattson and KS Mattson Partners, LP and for Related Relief; and Memorandum of Points*  
7 *and Authorities* [Doc. No. 1585 in Case No. 24-10545 (CN) and Doc. No. 157 in  
8 Case No. 24-10715 (CN) (the “Substantive Consolidation Motion”). A proposed form of order  
9 granting the relief requested in this Leave Request (the “Order”) is attached hereto as **Exhibit A**.

#### 10 **JURISDICTION**

11 This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This  
12 is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28  
13 U.S.C. §§ 1408 and 1409.

#### 14 **RELIEF REQUESTED**

15 By this Leave Request, the Committee seeks the entry of the Order, substantially in the form  
16 attached hereto as **Exhibit A**, granting the Committee leave to exceed the standard page limitation on  
17 memoranda of points and authorities from 25 pages to 32 pages with respect to the Substantive  
18 Consolidation Motion.

#### 19 **BASIS FOR RELIEF REQUESTED**

20 Bankruptcy Local Rule 9013-1(c) provides that, “[u]nless the Court expressly orders  
21 otherwise, the initial and response memoranda of points and authorities shall not exceed 25 pages of  
22 text and reply memorandum shall not exceed 15 pages of text.” Pursuant to the Substantive  
23 Consolidation Motion, identical copies of which were filed in both of the above-captioned cases, the  
24 Committee seeks to substantively consolidate the complex bankruptcy estates of LeFever Mattson and  
25 KS Mattson Partners, LP. The Substantive Consolidation Motion represents a significant milestone in  
26 both of the above-captioned chapter 11 cases. In order to adequately describe the nature of the relief  
27 requested in the Substantive Consolidation Motion and disclose the underlying facts that give rise to  
28 such relief, it is necessary for the Committee to file 32 pages of text. .

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WHEREFORE the Committee respectfully requests the entry of an order granting the relief requested above, and such other and further relief as the Court may deem just and appropriate.

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*Counsel to the Official Committee  
of Unsecured Creditors in In re LeFever Mattson*

**EXHIBIT A**  
**(Proposed Order)**

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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION

In re:  
LEFEVER MATTSON, a California  
corporation, *et al.*,<sup>1</sup>  
Debtors.

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

In re:  
KS MATTSON PARTNERS, LP,  
Debtor.

Case No.: 24-10715 (CN)  
Chapter 11

**ORDER GRANTING THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS' MOTION FOR LEAVE TO  
EXCEED THE PAGE LIMITATIONS  
WITH RESPECT TO ITS MOTION FOR  
SUBSTANTIVE CONSOLIDATION OF  
DEBTOR LEFEVER MATTSON AND KS  
MATTSON PARTNERS, LP**

Upon the motion (the "Leave Request")<sup>2</sup> of the Official Committee of Unsecured Creditors in  
*In re Lefever Mattson* (the "Committee") pursuant to Local Bankruptcy Rule 9013-1(c) for an order

<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.

<sup>2</sup> A capitalized term used but not defined in this Order shall have the meaning ascribed to it in the Leave Request or the Substantive Consolidation Motion.

1 authorizing the Committee to exceed the page limitations with respect to the *Motion of the Official*  
2 *Committee of Unsecured Creditors for Substantive Consolidation of Debtor Lefever Mattson and KS*  
3 *Mattson Partners, LP and for Related Relief; and Memorandum of Points and Authorities* [filed as  
4 both Doc. No. 1585 in Case No. 24-10545 (CN) and Doc. No. 157 in Case No. 24-10715 (CN) (the  
5 “Substantive Consolidation Motion”); and the Court having found it has jurisdiction over this matter;  
6 and the Court having found and determined that notice of the Leave Request by ECF is reasonable and  
7 sufficient under the circumstances, and no other or further notice need be provided; and the relief  
8 requested in the Leave Request being in the best interests of the Debtors’ estates in both of the above-  
9 captioned bankruptcy estates, their creditors, and other parties in interest; and after due deliberation  
10 and sufficient cause appearing therefor,

11 **IT IS HEREBY ORDERED THAT:**

- 12 1. The Leave Request is GRANTED.
- 13 2. The Committee is authorized to file and serve the Substantive Consolidation Motion  
14 not to exceed 32 pages (excluding declarations and exhibits).
- 15 3. This Court shall retain jurisdiction to hear and determine all matters arising from or  
16 related to the implementation, interpretation, or enforcement of this Order.

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18 \*\*\*END OF ORDER\*\*\*  
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