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7 *Proposed Attorneys for Debtor and Debtor in*
8 *Possession*

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

14 In Re:

Case No. 24-10715

15 KS MATTSON PARTNERS, LP,

Chapter 11

16 Debtor.¹

17 **STATEMENT PURSUANT TO RULE**
18 **2016(b)**
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28 ¹ The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is
c/o Stapleton Group, 514 Via de la Valle, Suite 210, Solana Beach, CA 92075

1 The undersigned, pursuant to Rule 2016(b) of the Federal Rules of Bankruptcy Procedure,
2 states that:

3 1. On November 22, 2024, an involuntary petition for relief under chapter 11 of the
4 Bankruptcy Code was filed against the Debtor in this Court. On June 9, 2024 (the "Relief Date"),
5 the Court entered the Stipulated Order for Relief in an Involuntary Case [Docket No. 131].
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7 2. The undersigned firm ("Hogan Lovells") is proposed counsel to KS Mattson
8 Partners, LP (the "Debtor"), in the above-captioned chapter 11 case (the "Chapter 11 Case").

9 3. Hogan Lovells was retained in connection with this Chapter 11 Case on the Relief
10 Date.

11 4. The compensation paid or agreed to be paid by the Debtor, within one year before
12 the date of filing of the involuntary petition in the Chapter 11 Case, to the undersigned is:

13 a. For legal services rendered or to be rendered in contemplation of and in connection
14 with this case \$0.00.
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16 b. Prior to the filing of this statement, the Debtor advanced, for legal services rendered
17 in contemplation of and in connection with this case \$0.00.

18 c. The unpaid balance due and payable for such legal services as of the petition date
19 was \$0.00.
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21 d. As no services were rendered by Hogan Lovells prior to the Relief Date and as no
22 retainer has been provided, the balance in Hogan Lovells's trust account, for
23 anticipated legal services to be rendered, is currently \$0.00.

24 5. The Debtor was the subject of an involuntary chapter 11 petition, filed November
25 22, 2024. Accordingly, no funds were advanced by the Debtor for petition filing fees with respect
26 to the Chapter 11 Case.

27 6. The services rendered or to be rendered include the following:
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- a. advising the Debtor of its rights, powers, and duties as debtor and debtor in possession continuing to operate and manage its business and affairs under chapter 11 of the Bankruptcy Code;
- b. preparing on behalf of the Debtor all necessary and appropriate applications, motions, proposed orders, other pleadings, notices, schedules, and other documents, and reviewing all financial and other reports to be filed in the Chapter 11 Case;
- c. advising the Debtor concerning, and preparing responses to, applications, motions, other pleadings, notices, and other papers that may be filed by other parties in the Chapter 11 Case;
- d. advising the Debtor with respect to, and assisting in the negotiation of, any financing agreements, sale agreements, and related transactions that may be necessary in the Chapter 11 Case;
- e. advising the Debtor regarding its ability to initiate actions to collect and recover property for the benefit of the estate;
- f. advising and assisting the Debtor in connection with any asset dispositions;
- g. advising and representing the Debtor with respect to employment related issues;
- h. advising and assisting the Debtor in negotiations with the Debtor's stakeholders;
- i. advising the Debtor concerning executory contract and unexpired lease assumptions, assignments, and rejections;
- j. advising the Debtor in connection with the formulation, negotiation, and promulgation of a plan or plans under the Bankruptcy Code, and related transactional documents;
- k. assisting the Debtor in reviewing, estimating, and resolving claims asserted against the Debtor's estate;

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- l. commencing and conducting in this Court litigation that is necessary and appropriate to assert rights held by the Debtor, protect assets of the Debtor's estate, or otherwise further the goal of completing the Debtor's successful liquidation;
- m. providing non-bankruptcy services for the Debtor to the extent requested by the Debtor, including, among other things, advice related to corporate governance; and
- n. performing all other necessary and appropriate legal services in connection with the Chapter 11 Case for or on behalf of the Debtor.

7. The source of payments made by the Debtor to the undersigned: Not applicable.

8. The undersigned has received no transfer, assignment, or pledge of property from the Debtor except as described herein.

9. The undersigned has not shared or agreed to share with any other entity, other than with members of undersigned's law firm, any compensation paid or to be paid.

Dated: June 23, 2025

/s/ Richard L. Wynne
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