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*Counsel to the Official Committee
 of Unsecured Creditors*

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

<p>In re:</p> <p>LEFEVER MATTSON, a California corporation, <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Case No.: 24-10545 (CN)</p> <p>(Jointly Administered)</p> <p>Chapter 11</p>
<p>In re:</p> <p>KS MATTSON PARTNERS, LP,</p> <p style="text-align: center;">Debtor.</p>	<p>Case No.: 24-10715 (CN)</p> <p>Chapter 11</p> <p>[No Hearing Requested]</p>

**STIPULATION TO EXTEND RESPONSE DEADLINE TO THE MOTION OF THE
 OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR SUBSTANTIVE
 CONSOLIDATION OF DEBTOR LEFEVER MATTSON AND KS MATTSON
 PARTNERS, LP AND FOR RELATED RELIEF**

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in these 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 (the “Committee”), the above-captioned
2 debtors and debtors-in-possession (the “LFM Debtors”), and KS Mattson Partners, LP (“KSMP”
3 and together with the LFM Debtors and the Committee, the “Parties”) hereby stipulate and agree
4 (“Stipulation”) as follows:

5 1. On June 20, 2025, the Committee filed a *Motion of the Official Committee of*
6 *Unsecured Creditors for Substantive Consolidation of Debtor LeFever Mattson and KS Mattson*
7 *and KS Mattson Partners, LP and for Related Relief* (the “Motion”). See Case No. 24-10545, ECF
8 No. 1585, and Case No. 24-10715, ECF No. 157.

9 2. The Motion is presently scheduled to be heard on July 25, 2025 at 11:00 a.m.
10 (Pacific Time) (the “Hearing”). See Case No. 24-10545, ECF No. 1684 and Case No. 24-10715,
11 ECF No. 184.

12 3. The current deadline to respond to the Motion is July 18, 2025. See Case No. 24-
13 10545, ECF No. 1684 and Case No. 24-10715, ECF No. 184.

14 4. A reasonable amount of time beyond the current deadline is needed for any
15 potential response to the Motion by the LFM Debtors and KSMP, if any.

16 5. The Parties hereby agree that the deadline for the LFM Debtors and KSMP to file
17 a response to the Motion is extended to July 22, 2025 at 4:00 p.m. (Pacific Time).

18 6. This Stipulation is subject to the approval of the Bankruptcy Court, and the Parties
19 agree to present the Stipulation to the Bankruptcy Court for approval.

20 7. The Parties agree that the Bankruptcy Court shall retain jurisdiction with respect to
21 all matters arising under or related to the interpretation or implementation of this Stipulation.

22 8. This Stipulation shall be effective immediately upon entry of an order approving
23 this Stipulation.

24 Dated: July 17, 2025

PACHULSKI STANG ZIEHL & JONES LLP

25 By: /s/ Steven W. Golden
26 Steven W. Golden
27 Counsel to the Committee
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Dated: July 17, 2025

Dated: July 17, 2025

KELLER BENVENUTTI KIM LLP

By: /s/ Thomas B. Rupp
Thomas B. Rupp

Counsel to the LFM Debtors

HOGAN LOVELLS US LLP

By: /s/ Richard L. Wynne
Richard L. Wynne

Counsel to KSMP