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Attorneys for Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In Re:

KS MATTSON PARTNERS, LP,

Debtor.¹

Case No. 24-10715

Chapter 11

**STIPULATION AUTHORIZING
 LIMITED USE OF CASH COLLATERAL
 TO REINSTATE PROPERTY
 INSURANCE POLICY**

No hearing requested.

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

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 This Stipulation is made by KS Mattson Partners, LP (“KSMP” or the “Debtor”), and Socotra
2 Capital, Inc., on behalf of itself and any of its affiliates as lender and/or servicer (the “Lender”).

3 The Debtor and Lender hereby stipulate and agree as follows:

4 1. The Debtor is authorized to use Lender’s cash collateral in an amount not to exceed
5 \$9,703.43 for the sole purpose of reinstating the property insurance policy covering the real
6 property located at 415 Pacific Ave., Piedmont, CA 94611 (the “Payment”).

7 2. Lender consents to such use of its cash collateral under paragraph 1 pursuant to 11
8 U.S.C. § 363(c)(2), and this Stipulation shall constitute adequate protection of Lender’s interest in
9 such cash collateral.

10 3. As additional adequate protection, Lender shall have a valid and perfected
11 replacement lien in (i) post-petition assets of Debtor, and (ii) the real property collateral of Lender
12 whose cash is used to fund the Payment, in both cases of the same nature, scope, and priority as the
13 Lender’s prepetition lien, in the amount of the cash collateral used pursuant to this Stipulation.

14 4. The Debtor shall provide Lender with evidence of reinstatement of the insurance
15 policy and proof of payment within 3 business days of execution of this Stipulation.

16 5. This Stipulation shall be effective upon the entry of an order approving the
17 Stipulation.

18
19 DATED: July 18, 2025

HOGAN LOVELLS US LLP

20 By: /s/ Richard L. Wynne

RICHARD L. WYNNE, ESQ.

21 Attorneys for Debtor and Debtor in Possession

22
23 DATED: July 18, 2025

SHEPPARD MULLIN RICHTER & HAMPTON LLP

24 By: /s/ Theodore A. Cohen

THEODORE A. COHEN, ESQ.

25 Attorneys for Lender Socotra Capital, Inc..

CERTIFICATE OF SERVICE

TRACY SOUTHWELL

1. I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. I am employed at Hogan Lovells US LLP and my business address is 1999 Avenue of the Stars, Suite 1400, Los Angeles, California 90067.

2. I certify that on July 18, 2025, the *Stipulation Authorizing Limited Use of Cash Collateral to Reinstate Property Insurance Policy* was served by the court via NEF and hyperlink to the documents on the parties listed on the annexed **Exhibit A**.

Los Angeles, California

/s/ Tracy Southwell

Dated July 18, 2025

Tracy Southwell

EXHIBIT A

In re KS Mattson Partners, LP
Case No. 25-10715

Name	Party	Email
Asaph Abrams	JPMorgan Chase Bank, N.A.	ecfcamb@aldridgepate.com
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Benjamin R. Levinson	Y. Tito Sasaki and Janet L. Sasaki Trust	ben@benlevinsonlaw.com
Dara Levinson Silveira	LeFever Mattson, a California corporation and Windtree, LP (Petitioning Creditor)	dsilveira@kbkllp.com, hrobertsdonnelly@kbkllp.com

¹ Fennemore lawyers were debtor's counsel prior to consent to the involuntary filing. Hogan Lovells US LLP will be debtor's counsel going forward.

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