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Attorney for Secured Creditors
Y. Tito Sasaki and Janet L. Sasaki Trust

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
(Santa Rosa Division)

In re:

Case No. 24-10715-CN
Chapter 11

KS MATTSON PARTNERS, LP,

RS No. BRL-407

NOTICE OF HEARING ON MOTION FOR
ORDER TERMINATING AUTOMATIC STAY
OR REQUIRING ADEQUATE PROTECTION
(APN # 128-422-075-000, Vineburg, California)

DATE: August 15, 2025

TIME: 10:00 a.m.

Debtor.

DEPT: 215 or by Zoom Video/Zoom¹
1300 Clay Street, Oakland, CA

To Debtor, Debtor's Counsel, the 20 Largest Unsecured Creditors, the United States Trustee; and
all Other Parties in Interest:

NOTICE IS HEREBY GIVEN that on August 15, 2025, at 10:00 a.m., or as soon thereafter as the
matter can be heard in Courtroom No. 215 of the United States Bankruptcy Court located at 1300 Clay
Street, Oakland, California, before the Honorable Charles Novack, United States Bankruptcy Judge,

¹ Please see Judge Novack's posted calendar for this hearing at www.canb.uscourts.gov for information on how to attend via
Zoom video or Zoom Telephone.



1 Secured Creditor Y. Tito Sasaki and Janet L. Sasaki Trust ("Creditor") will, and hereby does, move the
2 Court to make an Order terminating the automatic stay for lack of equity and cause under 11 U.S.C.
3 § 362(d) with respect to the interest of debtor Firetree 1, LP and the interest of KS Mattson Partners, LP
4 and their estates' interest in the real property commonly known as APN # 128-422-075-000, Vineburg,
5 California and more particularly described as set forth in the deed of trust attached to the declaration filed
6 herewith.

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8 **Counsel and Parties, and other interested persons may attend the hearing in person in**
9 **Courtroom 215 in Oakland, by Zoom Video, or Zoom Telephone. Additional information is**
10 **available on Judge Novack's Procedures page on the court's website, and information on how to**
11 **attend the hearing by Zoom will be included with each calendar posted under Judge Novack's**
12 **Calendar on the court's website.**

13 **If you have any questions regarding how to appear at a court hearing, you may contact the**
14 **Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy**
15 **Court's website.**

16 **PLEASE TAKE FURTHER NOTICE THAT a Respondent will not be required to, but may,**
17 **file responsive pleadings, points and authorities, and declarations for any preliminary hearing.**

18 **NOTICE IS HEREBY FURTHER GIVEN that, should you fail to appear, either personally**
19 **or through your attorney or representative at the time and place hereinabove set for hearing, the**
20 **Bankruptcy Judge may grant the relief sought by Creditor and may make an order terminating the**
21 **automatic stay as to Debtor and the estate under 11 U.S.C. § 362(d) and authorizing and permitting**
22 **Creditor to begin and/or complete a foreclosure sale of the Property under Creditor's loan, with**
23 **waiver of Bankruptcy Rule 4001(a)(3) and California Civil Code § 2924g(d) to the extent that it**

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1 applies and allowing the purchaser to obtain possession of the Property under California law
2 without further order of the Court.

3 LEVINSON LAW APC

4 Dated: July 18, 2025

5 /S/ BENJAMIN R. LEVINSON

6 BENJAMIN R. LEVINSON,
7 Attorney for Creditor
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