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

In re:

LEFEVER MATTSON, a California
 corporation, *et al.*,¹

Debtors.

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

**LEFEVER MATTSON'S RESPONSE TO
 AND JOINDER IN THE MOTION OF
 THE OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS FOR
 SUBSTANTIVE CONSOLIDATION OF
 LEFEVER MATTSON AND
 KS MATTSON PARTNERS, LP**

In re:

KS MATTSON PARTNERS, LP,

Debtor.

Date: July 25, 2025
Time: 11:00 a.m.
Place: United States Bankruptcy Court
 1300 Clay Street, Courtroom 215
 Oakland, CA 94612

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 LeFever Mattson, a California corporation (“LeFever Mattson”), a debtor and debtor in
2 possession in the above-captioned chapter 11 cases, joins in the *Motion of the Official Committee*
3 *of Unsecured Creditors for Substantive Consolidation of Debtor Lefever Mattson and KS Mattson*
4 *Partners, LP and for Related Relief* [Dkt. No. 1585] (the “Motion”), filed on June 20, 2025,² for
5 the reasons set forth in the *Declaration of Bradley D. Sharp* (the “Sharp Declaration”), filed
6 concurrently herewith. LeFever Mattson further responds that it is discussing with the Official
7 Committee of Unsecured Creditors (the “Committee”), KS Mattson Partners, LP, and objectors to
8 the Motion the terms of a stipulated order to continue the Motion and address related issues, more
9 detail on which will be presented in the Committee’s reply papers in support of the Motion.

10 Dated: July 22, 2025

KELLER BENVENUTTI KIM LLP

11 By: /s/ Dara L. Silveira

12 Dara L. Silveira

13 *Attorneys for Debtor LeFever Mattson, a*
14 *California corporation*

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28 ² An identical copy of the Motion was filed in Case No. 24-10715 (Bankr. N.D. Cal.) as
Docket No. 157.