

FILED
AUG -4 2025
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

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IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

DEBTORS: LEFEVER MATTSON, A
CALIFORNIA CORPORATION, AND
AFFILIATES

Case No.: 24-10545, et al. (Jointly
Administered)

NOTICE OF MOTION AND MOTION FOR
RELIEF FROM THE AUTOMATIC STAY:

ORIGINALLY FILED: SEPT. 12, 2024

HEARING DATE: AUG. 22, 2025

HEARING TIME: 11:00AM

HEARING LOCATION: ROOM 215

MOVANT: MARK BAKER

JUDGE: CHARLES NOVACK

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 362 and on the date and time
and in the courtroom stated above, the Plaintiff will request that this court enter an order
granting relief from the automatic stay as to Debtor and Debtor's bankruptcy estate on the
grounds set forth in following Motion.

The Nonbankruptcy Action

Case Name: Mark Baker v. Gogris Corporation, et al.

NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY -

Case Number: CU25-06372

Court: Superior Court of California - Solano County

Causes of Action: Title III of the Americans with Disabilities Act; California Unruh
Civil Rights Act

Bankruptcy Case History

Filing Date: September 12, 2024

Type: Chapter 11

Grounds for Relief from Stay

Pursuant to 11 U.S.C. § 362(d)(1), cause exists to grant Movant relief from stay to proceed with the Nonbankruptcy Action to final judgment in the nonbankruptcy forum for the following reasons:

- The Claims are nondischargeable in nature and can be most expeditiously resolved in the nonbankruptcy forum.

Evidence in Support of Motion

- The DECLARATION RE ACTION IN NONBANKRUPTCY FORUM

Movant requests the following relief:


Movant may proceed under applicable nonbankruptcy law to enforce its remedies to proceed to final judgment in the nonbankruptcy forum, provided that the stay remains

1 in effect with respect to enforcement of any judgment against the Debtor or property of
2 the Debtor's bankruptcy estate.

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5 Dated: July 17, 2025

6 Respectfully Submitted,

7 By: /s/ Mark Baker
8 In Pro Per

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10 7-30-2025
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