

KELLER BENVENUTTI KIM LLP
 101 MONTGOMERY STREET, SUITE 1950
 SAN FRANCISCO, CALIFORNIA 94104

KELLER BENVENUTTI KIM LLP
 TOBIAS S. KELLER (Cal. Bar No. 151445)
 (tkeller@kbbkllp.com)
 DAVID A. TAYLOR (Cal. Bar No. 247433)
 (dtaylor@kbbkllp.com)
 THOMAS B. RUPP (Cal. Bar No. 278041)
 (trupp@kbbkllp.com)
 101 Montgomery Street, Suite 1950
 San Francisco, California 94104
 Telephone: (415) 496-6723
 Facsimile: (650) 636-9251

*Attorneys for the Debtors and
 Debtors in Possession*

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

In re:
 LEFEVER MATTSON, a California
 corporation, *et al.*,¹

 Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**CERTIFICATE OF NO OBJECTION
 REGARDING NOTICE OF SALE OF
 SUBJECT PROPERTY LOCATED AT
 110 FORDHAM CIRCLE, VALLEJO, CA
 94589**

In re

 KS MATTSON PARTNERS, LP,

 Debtor.

[Re: Dkt. No. 1727]

Objection Deadline: August 4, 2025

¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. 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/IM>

THE NOTICE OF SALE

On July 14, 2025, Keller Benvenuti Kim LLP, counsel for the debtors in the above-captioned chapter 11 cases (the “**Debtors**”),² filed the below-referenced notice of sale (the “**Notice of Sale**”) and adequate assurance declaration (the “**Buyer’s Declaration**”) pursuant to the *Order Establishing Procedures for Real Property Sales* [Dkt. No. 971] (the “**Sale Procedures Order**”) entered by the Court on March 5, 2025:

- *Notice of Sale of Subject Property Located 110 Fordham Circle, Vallejo, CA 94589* [Dkt. No. 1727]

The Notice of Sale was served on July 14, 2025. The deadline to file responses or oppositions to the Notice of Sale was August 4, 2025. An objection to the Notice of Sale was served on the Debtors by HSBC Bank USA, National Association, as Trustee for the Holders of the Deutsche Alt-A Securities, Inc. Mortgage Loan Trust, Mortgage Pass-Through Certificates Series 2007-OA4; Shellpoint Mortgage Servicing as servicer (“**HSBC**”). On August 15, 2025, the Debtors and HSBC entered into the *Stipulation for Withdrawal of Objection and Amendment to Notice of Sale of Property Located at 110 Fordham Circle, Vallejo, CA 94589* [Dkt. No. 2027], which the court approved [Dkt. No. 2035] (the “**Stipulation and Order**”). No other opposition or responses have been filed with the Court or received by the Debtors. Pursuant to the Sale Procedures Order, the Debtors are authorized to file a Certificate of No Objection and upload the proposed order substantially in the form attached to the Notice of Sale as Exhibit 1. Following the entry of an order by the Court, the Debtors are authorized to proceed with the closing of the sale of the Subject Property.

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Sale Procedures Order or the Notice of Sale. Unless otherwise indicated, “Debtors” as used herein excludes KSMP.

DECLARATION OF NO RESPONSE RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
that:

1. I am an attorney with the firm of Keller Benvenutti Kim LLP, counsel for the
Debtors.

2. I certify that I have reviewed the Court's docket in the Debtors' cases and the only
objection received to the Notice of Sale was that of HSBC which has been resolved by the
Stipulation and Order.

Dated: August 20, 2025

KELLER BENVENUTTI KIM LLP

By: /s/ Gabrielle L. Albert

Gabrielle L. Albert

*Attorneys for the Debtors and Debtors in
Possession*