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

In re

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

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

In re

KS MATTSON PARTNERS, LP,
Debtor.

**NOTICE OF FILING OF REVISED
PROPOSED ORDER GRANTING MOTION
(1) ESTABLISHING BAR DATES; (2)
APPROVING FORM AND MANNER OF
NOTICE OF BAR DATE AND PROCEDURES
WITH RESPECT THERETO; AND (3)
APPROVING CONFIDENTIALITY
PROTOCOLS**

Re: Dkt. No. 1951

Date: August 26, 2025

Time: 1:00 p.m.

Place: (In Person or Via Zoom)

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

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://unitedstatesbankruptcy.com/USBA>.

1 **PLEASE TAKE NOTICE THAT** attached hereto as Exhibit A is a revised *Proposed Order*
2 *Granting Motion (1) Establishing Bar Dates; (2) Approving Form and Manner of Notice of Bar Date*
3 *and Procedures With Respect Thereto; and (3) Approving Confidentiality Protocols* (the “Revised
4 Proposed Bar Date Order”).

5 **PLEASE TAKE FURTHER NOTICE THAT** the Revised Proposed Bar Date Order
6 contains the following exhibits: (i) Exhibit A-1 (Bar Date Notice); (ii) Exhibit A-2 (Voluntary
7 Questionnaire); and (iii) Exhibit A-3 (Publication Notice) (the “Revised Exhibits”)

8 **PLEASE TAKE FURTHER NOTICE THAT** attached hereto as Exhibit B is a redline
9 showing the changes between the Revised Proposed Bar Date Order and the Revised Exhibits, on the
10 one hand, and the proposed order and exhibits appended to the *Motion for an Order (1) Establishing*
11 *Bar Dates; (2) Approving Form and Manner of Notice of Bar Date and Procedures With Respect*
12 *Thereto; and (3) Approving Confidentiality Protocols* [Dkt. No. 1951] (the “Bar Date Motion”), with
13 the exception that there is no redline for Exhibit A-2, as the Voluntary Questionnaire attached as
14 Exhibit A-2 to the Revised Exhibits replaces in its entirety the Proof of Interest form that was attached
15 as Exhibit A-2 to the Bar Date Motion.

16 **PLEASE TAKE FURTHER NOTICE THAT** attached hereto as Exhibit C is a redline
17 showing differences between the confidentiality protocol proposed by the Bar Date Motion and that
18 previously approved in the LeFever Mattson debtors’ chapter 11 cases.

19 Dated: August 25, 2025

/s/ Richard L. Wynne

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Exhibit A

Revised Proposed Order

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Case No. 24-10545 CN (Lead Case)
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In re
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Debtor.

**REVISED [PROPOSED] ORDER GRANTING
MOTION FOR AN ORDER (1)
ESTABLISHING BAR DATE; (2)
APPROVING FORM AND MANNER OF
NOTICE OF BAR DATE AND PROCEDURES
WITH RESPECT THERETO; AND (3)**

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/LM>.

**APPROVING CONFIDENTIALITY
PROTOCOLS**

Date: August 26, 2025

Time: 1:00 p.m.

Place: (In person or via Zoom)

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

This matter coming before the Court on the *Motion for an Order (I) Establishing Bar Date; (2) Approving Form and Manner of Notice of Bar Date and Procedures With Respect Thereto; and (3) Approving Confidentiality Protocols* [Docket No. 1951] (the “Motion”),² filed by the above-captioned debtor (“Debtor KSMP” or “KSMP”); the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. Creditor Bar Date. October 3, 2025 at 11:59 p.m. Pacific Time (the “General Bar Date”) is hereby established as the last day for all Creditors (other than governmental units) to file Proofs of Claim against Debtor KSMP arising (or deemed to have arisen) prior to November 22, 2024 (the “Petition Date”), including requests for allowance and payment of priority claims arising under sections 507(a)(3) through (10) of the Bankruptcy Code.

3. Governmental Bar Date. December 8, 2025 at 11:59 p.m. Pacific Time (the “Governmental Bar Date” and, together with the General Bar Date, the “Bar Dates” and each, a “Bar Date”) is hereby established as the last day for governmental units to file Proofs of Claim against Debtor KSMP arising (or deemed to have arisen) prior to the Petition Date.

4. Amended Schedules Bar Date. To the extent Debtor KSMP files an amendment to or supplements its Schedules and Statements after the mailing of the Bar Date Notice, Debtor KSMP shall provide notice of any such amendment or supplement to the holders of any Claims affected

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

1 thereby within fourteen (14) calendar days of such filing. Holders of any Claims affected by any such
2 amendments must file any proofs of claim with respect to such Claims **on or before the later of (i)**
3 **the applicable Bar Date and (ii) 11.59 p.m. (Pacific Time) on the date that is 30 calendar days**
4 **after the date on which notice is served.**

5 5. Persons Not Required to File Claims. The following persons and other entities whose
6 claims otherwise would be subject to the Bar Date are excepted from the provisions herein and are **not**
7 required to file proofs of claim against Debtor KSMP on or before the Bar Date: (a) any person or
8 entity whose Claim is listed on the Schedules and Statements and (i) whose Claim is not described
9 therein as “disputed,” “contingent,” or “unliquidated”; (ii) who does not dispute the amount or nature
10 of such Claim as set forth in the Schedules and Statements; and (iii) who does not dispute that the
11 Claim as listed in the Schedules and Statements is an obligation of Debtor KSMP; (b) any person or
12 entity that has already properly filed a proof of claim against Debtor KSMP with the Clerk of this
13 Court or the Claims Agent; (c) any person or entity whose Claim has been paid in full by Debtor
14 KSMP pursuant to the relief granted by an order of the Court or otherwise; (d) any person or entity
15 who holds a Claim that has been allowed by a final order of the Court entered on or before the
16 applicable Bar Date; and (e) any holder of a Claim for which a separate deadline is fixed by the Court.

17 6. Any Proof of Claim required to be filed pursuant to the provisions of this Order and
18 not filed on or before the applicable Bar Date shall be forever barred from assertion against Debtor
19 KSMP, Debtor KSMP’s estates, and any successor to the foregoing under a confirmed plan of
20 reorganization and/or liquidation or structured dismissal or otherwise (a “Confirmed Plan”), and the
21 holder of such Claim shall be forever barred and prohibited from participating in any distribution in
22 this chapter 11 case, including, but not limited to, any distribution under a Confirmed Plan or in a
23 subsequent chapter 7 liquidation of Debtor KSMP’s estate.

24 7. Approval of Specialized Creditor Confidentiality Protocol. The “Specialized Creditor
25 Confidentiality Protocol”, which shall apply to any Proofs of Claim filed by and/or Voluntary
26 Questionnaire submitted by any person, trust, partnership, corporation or other entity (i) that asserts a
27 Claim against Debtor KSMP arising out of an ownership interest in real property owned or formerly
28 owned by Debtor KSMP, even if such person, trust, partnership, corporation or other entity is not listed

1 on title; (ii) arising out of an investment in any other property or entity that was sold to them by Debtor
2 KSMP; or (iii) that is a current or former investor in Perris Freeway Plaza, LP, Specialty Properties
3 Partners, LP, and Treehouse Investments, LP—entities for which KSMP serves as the general partner
4 (each, a “Specialized Creditor”), is approved. The Specialized Creditor Confidentiality Protocol is as
5 follows:

6 a) Specialized Creditors are directed not to file a Proof of Claim Form with
7 the Court. Instead, all such forms must be sent to the Claims Agent.

8 b) Specialized Creditor Proofs of Claim (including any attachments thereto)
9 will not be available to the general public and will not be able to be accessed on the Claims
10 Agent Website. However, the following information (and only the following information)
11 will be posted on the Claims Agent Website, whether such information is included on the
12 Schedules and Statements or in a submitted Proof of Claim Form: (a) name of the Creditor;
13 and (b) amount of the asserted Claim.

14 c) The Specialized Creditor Confidentiality Protocol is for the benefit of the
15 Specialized Creditors. Accordingly, Specialized Creditors may elect to make any
16 information included in their own Proof of Claim Form public; *provided, however*, that any
17 such disclosure shall not constitute a blanket waiver of confidentiality of all other
18 information contained in or attached to such form and no other party may disclose any
19 information from such form, except to Permitted Parties (as defined below).

20 d) Specialized Creditor Proofs of Claim and the information contained thereon
21 and attached thereto shall be held and treated as confidential by Debtor KSMP, Debtor
22 KSMP’s counsel, and the Claims Agent and copies thereof may be provided to the parties
23 listed below (the “Permitted Parties”). No party, including a Permitted Party, may obtain
24 copies of Proof of Claim unless such party executes a confidentiality agreement in a form
25 agreeable to Debtor KSMP. Permitted Parties shall keep confidential and not disclose the
26 contents of any Specialized Creditor Proof of Claim except as otherwise provided herein
27 or by order of the Court.

28 8. The “Permitted Parties” are as follows:

a) The Office of the United States Trustee (the “UST”);

b) Counsel and other professionals for Debtor KSMP retained pursuant to an
order of the Court, including partners, counsel, associates, and employees of such
professionals;

c) Counsel and other professionals for the LFM Debtors retained pursuant to
an order of the Court, including partners, counsel, associates, and employees of such
professionals;

d) Counsel and other professionals for the LFM Committee retained pursuant
to an order of the Court, including partners, counsel, associates, and employees of such
professionals;

- 1 e) Members of the LFM Committee;
- 2 f) Any mediator appointed pursuant to an order of the Court;
- 3 g) Any trustee, or functional equivalent thereof, appointed to administer
4 payments to Specialized Creditors, including pursuant to any plan;
- 5 h) Persons who are permitted access to one or more Proofs of Claim upon
6 stipulation of the Specialized Creditor that submitted such form(s), after prior notice to
7 counsel to Debtor KSMP and a reasonable opportunity to object; and
- 8 i) Such other persons as the Court allows after notice and an opportunity for
9 hearing; *provided, however*, that any such determination shall be made on no less than
10 fourteen days' prior notice to affected Specialized Creditors; and
- 11 j) Socotra Capital, Inc., and its counsel and other professionals, also shall be
12 designated a Permitted Party, subject to execution of a confidentiality agreement or
13 protective order similar in form and substance to that stipulated protective order in place
14 in the LFM Chapter 11 Cases.

15 9. Approval of Bar Date Notice. The Bar Date Notice, in substantially the form attached
16 hereto as **Exhibit A-1**, is approved in all respects. In accordance with Bankruptcy Rule 2002, Debtor
17 KSMP is hereby authorized to cause the Bar Date Notice to be given as part of the Creditor Claims
18 Package (as defined below) by first class mail, postage prepaid, on or before one week following the
19 entry of this order (the "Service Deadline").

20 10. Approval of Voluntary Questionnaire. The voluntary questionnaire for Specialized
21 Creditors, in substantially the form attached hereto as **Exhibit A-2** (the "Voluntary Questionnaire"), is
22 approved. The Voluntary Questionnaire, which shall not be posted on the Court docket or made part
23 of the official Proof of Claim, is entirely optional. Failure to complete a Voluntary Questionnaire shall
24 not invalidate a properly and timely filed Proof of Claim. KSMP is hereby authorized to cause the
25 Voluntary Questionnaire to be served as part of the Creditor Claims Package (as defined below) by
26 first class mail, postage prepaid, on or before the Service Deadline.

27 11. The creditor claims package (the "Creditor Claims Package"), which consists of the
28 Bar Date Notice, the Voluntary Questionnaire and Official Form 410, is approved. The Creditor
Claims Packages shall be sent for distribution on or before the Service Deadline. The Creditor Claims
Package shall be served by first-class mail and e-mail (where known) on all (1) Specialized Creditors,
(2) other known KSMP creditors, (3) and the Office of the United States Trustee. The Creditor Claims

1 Package may also be served on all persons that (x) that according to the LFM Debtors' books and
2 records, were current and/or former investors in the LFM Debtors, (y) received notice of the bar date
3 in the LFM Chapter 11 Cases as "Identified Potential Investors," or (z) filed proofs of interest or proofs
4 of claim as "Investors" in the LFM Chapter 11 Cases.

5 12. If multiple Creditor Claim Packages would otherwise go to the same physical address,
6 Debtor KSMP shall be entitled, but not required, to combine the Creditor Claim Packages into a single
7 Creditor Claim Package, even if the creditor names are not identical.

8 13. Publication of Bar Date Notice. Debtor KSMP shall cause notice of the Bar Date to be
9 given by publication to creditors to whom notice by mail is impracticable, including creditors who are
10 unknown or not reasonably ascertainable by Debtor KSMP and creditors whose identities are known
11 but whose addresses are unknown by Debtor KSMP. Specifically, Debtor KSMP shall cause the
12 Publication Notice, in substantially the form attached hereto as **Exhibit A-3**, to be published in (a) one
13 occasion of *USA Today* (or similar national newspaper), (b) one occasion of the *Sacramento Bee* (or
14 similar regional newspaper), and (c) one occasion of *The Press Democrat* (or similar Sonoma / Napa
15 local publication), on or before a date at least fourteen days before the Bar Date.

16 14. Adequate and Sufficient Notice. Notice of the Bar Date as set forth in this order and
17 in the manner set forth herein (including, but not limited to, the Bar Date Notice, the Publication
18 Notice, and any supplemental notices that Debtor KSMP may send from time to time) constitutes
19 adequate and sufficient notice of the Bar Date and satisfies the requirements of the Bankruptcy Code,
20 the Bankruptcy Rules, and the Local Rules.

21 15. Authorization. The Debtor is authorized to take or refrain from taking any action
22 necessary or appropriate to implement the terms of and the relief granted in this Order without seeking
23 further order of the Court.

24 16. Debtor KSMP is authorized to make non-substantive changes to the documents
25 referenced herein without further order of the Court, including, without limitation, changes to correct
26 typographical and grammatical errors and to make conforming changes among the aforementioned
27 documents prior to their distribution.
28

1 17. Jurisdiction. This Court shall retain jurisdiction over all matters related to or arising
2 from the Motion or the interpretation or implementation of this Order.

3 ***** END OF ORDER *****
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EXHIBIT A-1

Bar Date Notice

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

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

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

In re
KS MATTSON PARTNERS, LP,
Debtor.

**NOTICE OF BAR DATE AND
PROCEDURES FOR SUBMITTING PROOFS
OF CLAIM**

**TO: ALL CREDITORS THAT HELD A CLAIM AGAINST KSMP AS OF THE
NOVEMBER 22, 2024, PETITION DATE:**

PLEASE TAKE NOTICE OF THE FOLLOWING:

On August [●], 2025, the Bankruptcy Court entered an order setting deadlines (called “Bar Dates”) for filing claims in the chapter 11 case of KS Mattson Partners., LP (defined herein as “Debtor KSMP” or “KSMP”).

The questions and answers below explain what the Bar Dates mean, who must file a claim, and how to do so.

Want More Information or Need Help? Attend Our Town Hall!

KSMP will host a town hall via Zoom on [●] at [●] [a.m. / p.m.] to discuss the process of completing and submitting proofs of claim. Information

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/LM>.

1 regarding the town hall can be found on the Claims Agent's website at:
2 <https://veritaglobal.net/lm/info/14065>.

3 ***In the meantime, if you need help understanding the Proof of Claim, or the***
4 ***submission process, please contact KSMP's counsel on***
5 ***KSMP@hoganlovells.com.***

6 **1. WHAT DOES THE TERM BAR DATE MEAN?**

7 The Bar Date is the date by which individuals and entities who assert a Claim against KSMP
8 must submit a proof of claim with the Claims Agent in the manner indicated below.

9 **2. WHAT IS A PROOF OF CLAIM?**

10 A Proof of Claim is the paperwork you submit to state the amount and nature of your claim
11 in KSMP's bankruptcy case. It consists of:

- 12 • Form 410 (Official Proof of Claim Form), which must be completed and signed, and
- 13 • Supporting documents that show the basis for your claim.

14 For some creditors, a Proof of Claim may also include the Voluntary Questionnaire, if you
15 choose to complete it.

16 **Why it matters:** Filing a Proof of Claim ensures your claim is recognized and considered
17 in the bankruptcy case. If you do not file your claim by the Bar Date, you may lose the right
18 to pursue it.

19 **3. WHO DOES THIS NOTICE APPLY TO AND WHEN IS THE DEADLINE?**

20 This Notice applies to anyone who may have a claim against KSMP. This Notice does not
21 apply to those who only have claims against the LeFever Mattson Debtors or any other individual
22 or entity affiliated with KSMP.

- 23 • **For creditors other than governmental entities:** The Bar Date is **October 3, 2025**
24 **at 11:59 p.m. Pacific Time**. This includes:
 - 25 ○ Claims that arose before November 22, 2024 (the petition date); and
 - 26 ○ Claims that arose in the **ordinary course of business** between November 22,
27 2024 and June 9, 2025.
- 28 • **For governmental creditors (such as tax authorities):** The Bar Date is **December 8, 2025 at 11:59 p.m. Pacific Time**.

This Notice does not apply to claims that arose after June 9, 2025. Those claims will be
addressed separately later.

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4. DO YOU NEED TO SUBMIT A PROOF OF CLAIM?

You must file a Proof of Claim if:

- Your claim is not listed in KSMP's schedules of assets and liabilities (available on the Claims Agent's website at Docket No. 1980); or
- Your claim is listed in those schedules, but it is marked as contingent, unliquidated, or disputed.

If you are unsure whether you need to file, it is safest to file a proof of claim by the deadline.

5. WHAT ARE THE CONSEQUENCES OF NOT TIMELY AND PROPERLY SUBMITTING A PROOF OF CLAIM?

IF A CREDITOR WHO IS REQUIRED TO SUBMIT A PROOF OF CLAIM DOES NOT DO SO IN A TIMELY MANNER OR IN THE PROPER FORM, SUCH CREDITOR SHALL BE FOREVER BARRED, ESTOPPED, AND ENJOINED TO THE FULLEST EXTENT ALLOWED BY APPLICABLE LAW FROM VOTING ON A PLAN OF REORGANIZATION, ASSERTING SUCH CLAIM IN KSMP'S BANKRUPTCY AND RECEIVING A DISTRIBUTION FROM THE KSMP ESTATE.

6. WHAT FORMS DO I NEED TO COMPLETE AND RETURN WITH THIS NOTICE?

You will find two forms enclosed:

- 1) **Proof of Claim Form (Official Form 410):** This 3-page form is mandatory. All creditors **must** complete and return it by the deadline.
- 2) **Voluntary Questionnaire:** Certain creditors, called "Specialized Creditors" (explained below), are also asked to complete this form. It is not required, but it will help KSMP recreate its books and records and better understand the flow of funds between KSMP, the LeFever Mattson Debtors, and other third parties. KSMP believes that information gained through the Voluntary Questionnaire may expedite the resolution of this bankruptcy case—and, ultimately, distributions to creditors.

If you do not complete the Voluntary Questionnaire, your proof of claim will still be valid so long as your Proof of Claim Form (Official Form 410) is properly completed and filed on time.

7. WHO ARE "SPECIALIZED CREDITORS" AND DO I NEED TO COMPLETE THE VOLUNTARY QUESTIONNAIRE?

"Specialized Creditors" include:

- 1) Anyone who thinks they invested in a property with KSMP—even if their name isn't on the title—and believes they may have a claim related to that investment;

- 1 2) Anyone who invested in Perris Freeway Plaza, LP, Specialty Properties Partners, LP,
2 and Treehouse Investments, LP (three entities managed by KSMP that are not in
3 bankruptcy but are believed to have once owned real estate); and
4 3) Anyone who thinks they have a claim because KSMP sold them an investment in a
5 property or entity.

6 As noted above, if you are a Specialized Creditor, you are asked (but not required) to
7 complete the Voluntary Questionnaire in addition to your Proof of Claim Form.

8 If you are not a Specialized Creditor, you only need to complete the Proof of Claim Form.

9 **8. WHERE CAN I GET A COPY OF THE PROOF OF CLAIM FORM AND**
10 **VOLUNTARY QUESTIONNAIRE?**

11 The forms are enclosed with this mailing. You can also get extra copies in the following
12 ways:

- 13 • Download for free from the Claims Agent's website: <https://veritaglobal.net/LM>
- 14 • Request by email: KSMP@hoganlovells.com
- 15 • Call KSMP's Claims Agent: (877) 709-4751 (U.S./Canada) or +1 (424) 236-7231
16 (International)
- 17 • Download from the Bankruptcy Court's website (www.canb.uscourts.gov) – note: this
18 requires a PACER account and a small fee.

19 **9. HOW DO I SUBMIT MY PROOF OF CLAIM FORM?**

20 You must complete and sign the enclosed Proof of Claim Form, attach any supporting
21 documents, and make sure the Claims Agent **actually receives** it by October 3, 2025. You can
22 submit your claim in one of two ways:

- 23 1. **Online:** Upload your form through Verita's website at: <https://veritaglobal.net>
- 24 2. **By mail, courier or hand delivery:**

25 KS Mattson Partners, LP Claims Processing Center
26 c/o KCC dba Verita
27 222 N. Pacific Coast Highway, Suite 300
28 El Segundo, CA 90245

29 **Important notes:**

- 30 • Do not send by fax or email—these will not be accepted.
- 31 • If you file a paper claim, you must submit an original signed copy.

- If you mail your proof of claim and want a stamped copy returned to you as proof of receipt, include a second copy (i.e., photocopy) of your submission plus a self-addressed, stamped envelope.
- If mailing, do not send original supporting documents—send copies only. The Claims Agent will scan and may destroy attachments.
- **Specialized Creditors:** Your claim may be treated as confidential if submitted through the Claims Agent. **If you file directly on the public court docket instead, it will not be confidential.**
- **DO NOT SEND IT TO KSMP, ITS LAWYERS, OR ITS PROFESSIONALS.**

10. REQUESTS FOR ADDITIONAL INFORMATION AND COOPERATION

If after receiving a Proof of Claim, KSMP determines that additional information is needed to process your Claim, KSMP may contact you by telephone, mail, or email to request such additional information.

11. RESERVATION OF RIGHTS

Filing a Proof of Claim does not mean your claim will automatically be allowed. KSMP reserves all rights to review and challenge any Proof of Claim, including the right to dispute the amount, validity, priority, or extent of the claim, or to assert any applicable offsets or defenses. Nothing in this Bar Date Notice, in any Proof of Claim, or in the related schedules limits KSMP's ability to object to any Proof of Claim on any ground.

EXHIBIT A-2

Voluntary Questionnaire

In re KS Mattson Partners, LP
Case No 24-10715
Voluntary Creditor Questionnaire

We are requesting your help.

As many of you may know, Robbin L. Itkin was appointed as the Responsible Individual for Debtor KS Mattson Partners, LP (“**KSMP**”) on June 9, 2025, with effect from June 16, 2025. When she took over KSMP’s affairs, there was very limited information available to her. Prior to her involvement, KSMP did not maintain traditional books and records, and many documents and contracts she would expect to find — including investor contracts — appear to have been seized by the government and continue to remain unavailable to her.

Since her appointment, the Responsible Individual and her team have been hard working to piece together KSMP’s records and transactions. Together, we’ve made progress, but many important details are still missing. By filling out this questionnaire, you can help fill in those gaps so that claims can be understood and handled as efficiently and fairly as possible.

We do not take our request of you lightly. We understand that reviewing these past events may be difficult. Many of you are victims of Kenneth Mattson’s alleged fraudulent scheme, and going back through those experiences can be upsetting. We want to acknowledge that reality and sincerely appreciate the time and effort you are taking to provide this information, should you choose to do so.

If you are willing and able to help us, please provide as much information as you can. If you are unsure about specific facts or details, that’s okay — please just answer to the best of your knowledge.

Confidentiality

Will my information be public?

No. Your questionnaire will not be posted online or made part of the public bankruptcy records. It will be kept private.

Who will see it?

Only a small group of people connected to the case, such as KSMP, the court-appointed Responsible Individual, the LeFever Mattson Creditors’ Committee, Socotra Capital, and—if needed—any mediator or trustee who helps distribute funds. Their lawyers and professional advisors may also review it, as well as the professional advisors for the LeFever Mattson Debtors.

Can I trust that it will stay private?

Yes. Every single person who has access is legally required to keep your information confidential. They may only use it to help move this case forward and to protect the interests of people affected.

Important Instructions

- **This questionnaire is voluntary and not required by the Court. Completing it will not affect whether your Proof of Claim is valid.**

- Your completed and properly filed Proof of Claim is the official document that establishes your claim in the bankruptcy case. You must be sure to fully complete the Proof of Claim form and provide all necessary documentation with it to ensure that your claim meets the requirements of the Bankruptcy Code.
- If you provide documents to us with this questionnaire, you should also include the same documents with your Proof of Claim form. Alternatively, you can simply note on this form (where applicable) that we may find the relevant documentation in your Proof of Claim form.
- You may fill out just one questionnaire to cover yourself, your spouse and any other trust, partnership or investment vehicle through which your family may have transacted with KSMP.
- You may complete this form either in paper copy (returning it along with your Proof of Claim form) or online at <https://veritaglobal.net/LM>.

* * *

Instructions: Please complete Part 1. For Parts 2–7, fill out only those that apply to your situation. If a section does not apply to you, please skip it. You may attach additional pages if you run out of space.

Part 1: Your Information

1. Your full name: _____

2. Current mailing address: _____

3. Phone number: _____

4. Email address: _____

5. Preferred way for the Debtor KSMP and its professionals to contact you about this questionnaire (please check one):

- Mail ☐
- Email ☐
- Phone ☐
- Other (please specify): _____

6. Secondary contact person (optional):

- Name: _____
- Relationship to you: _____
- Phone number: _____
- Email address: _____

7. Please list all names in which you, your spouse, or any other family member (or an entity related to any of you, such as an IRA, partnership, living trust, or family trust) transacted with the Debtor, Mr. Mattson, Perris Freeway Partners, LP, Speciality Properties Partners, LP, and/or Treehouse Investments LP.

8. If you are represented by an attorney in connection with your claims, please provide your attorney's information:

- Attorney name: _____
- Attorney phone: _____
- Attorney email: _____

Part 2: Your Investments in KS Mattson Partners, LP (Ownership Interests)

Complete this section only if you invested in what you understood to be an **ownership or partnership interest in KSMP itself** (not in any LeFever Mattson Debtor or in a specific property or project owned by KSMP—those are covered in the next section). If you did not invest directly in KSMP, skip to Part 3.

Dates and amounts of investments in KSMP made by you, your spouse, family member or related entity:

Name in Which Investment Was Made	Date of Investment	Amount Invested

Payments you, your spouse, family member or related entity received on account of an ownership interests in KSMP:

Who Made the Payment (i.e., KSMP or another entity)?	Who Received the Payment (i.e., you, your spouse, family member, IRA, living trust or family trust)?	Date of Payment	Amount Paid	Was the Payment Earmarked for or Related to a Specific Investment of KSMP?

Who Made the Payment (i.e., KSMP or another entity)?	Who Received the Payment (i.e., you, your spouse, family member, IRA, living trust or family trust)?	Date of Payment	Amount Paid	Was the Payment Earmarked for or Related to a Specific Investment of KSMP?

Supporting documentation: If you have attached relevant contracts, checks, or other documents to your Proof of Claim, please check here: YES ☐ NO ☐

Part 3: Ownership Investments in Real Property with KSMP (i.e., so-called Tenancy in Common or “TIC” Interests)

Please complete this section if you (or a related entity, such as a spouse, family member, IRA, living trust, or family trust) entered into a transaction where you believed you were purchasing an ownership interest in a particular property or project from KSMP. If not, skip to Part 4.

Below is a list of the properties in which KSMP is believed currently to be on record title:

Address	APIN
1014-1018 1st St W, Sonoma, CA 95476	128-083-012
1022 1st St W, Sonoma, CA 95476	128-083-012
1549 E Napa St, Sonoma, CA 95476	127-312-059
1549A E Napa St, Sonoma, CA 95476	127-312-059
18010 Hwy 12, Boyes Hot Springs, CA 95476	056-385-002
18275 Sonoma Highway, Boyes Hot Springs, CA 95416	056-415-017
18285 Hwy 12, El Verano, CA 95476	056-415-020
Arroyo Rd, Boyes Hot Springs, CA 95416	056-415-016
320 Arroyo Rd, Boyes Hot Springs, CA 95416	056-415-018
1834-1836 Ocean Front, Del Mar, CA 92014	299-147-05
18590 Hwy 12, Boyes Hot Springs, CA 95476	056-501-061

19357 Hwy 12, Sonoma, CA 95476	
19331 Hwy 12, Sonoma, CA 95476	127-141-006
19339 Hwy 12, Sonoma, CA 95476	127-141-006
19343 Hwy 12, Sonoma, CA 95476	127-141-006
19355 Hwy 12, Sonoma, CA 95476	127-141-006
22 Boyes Blvd, Boyes Hot Springs, CA 95476	056-402-001
22666 Broadway, Sonoma, CA 95476	128-422-040
22666A Broadway, Sonoma, CA 95476	128-422-040
230 E Napa St, Sonoma, CA 95476	018-222-009
23105 Millerick Road, Sonoma, CA 95476	128-445-006
2500 Castle Rd, Sonoma, CA 95476	127-790-003
3003 Castle Rd, Sonoma, CA 95476	127-790-004
3200 Castle Rd, Sonoma, CA 95476	127-790-005
405 London Way, Agua Caliente, CA 95476	056-564-022, 023
414 W Napa St, Sonoma, CA 95476	018-193-047
415 Pacific Ave., Piedmont, CA 94611	51-4700-12, 13
443 Casabonne Lane, Sonoma, CA 95476	018-111-076
450G 1st Street East, Sonoma, CA 95476	018-790-016
450J 1st Street East, Sonoma, CA 95476	018-790-018
450 1st St E #A,B, K, Sonoma, CA 95476	018-790-020
454 15th Street, Del Mar, CA 92014	299-280-29
47 and 49 Natoma Street, Folsom, CA	071-0310-001, 009
531 Camino Del Mar, Del Mar, CA 92014	300-331-14-01
533 Camino Del Mar, Del Mar, CA 92014	300-331-14-02
62 Farragut Ave., Piedmont, CA 94610	41-4786-007, 008
8340/8350 Auburn Blvd, Citrus Heights, CA 95610	204-0461-042
856 4th St E, Sonoma, CA 95476	018-381-050
904 Highway 121, Sonoma, CA 95476	128-441-011
969 Rachael Rd, Sonoma, CA 95476	127-540-001

If you believe you have an ownership interest in any of these properties, please go to **Appendix A** (at the back of this questionnaire) and complete the chart for every property in which you believe you hold an interest. If a property in which you believe you purchased an interest from KSMP does not appear in the above list, that's okay — please write in the address and still complete the chart. We expect that some properties may have subsequently been transferred out of KSMP's possession.

Part 4: Loans Secured by Collateral

Complete this section if you believe you (or a related entity, such as a spouse, family member, IRA, living trust, or family trust) loaned money to KSMP in exchange for, or for any other reason received, a lien or collateral interest in one or more of KSMP's properties. Examples of collateral interests may include deeds of trust, mortgages, UCC financing statements, or similar security documents. If not, skip to Part 5.

Name of Party Making the Loan	Date of Loan	Name of Borrower on Loan	Description of Collateral Security	Repayment Dates and Amounts	Were Any Payments Interest, Principal or a Combination?

If you received a lien or collateral interest (including a deed of trust mortgage or similar security document) but did not make a loan to KSMP, please provide details regarding that transaction here and provide any relevant documentation (or indicate that it is included with your Proof of Claim).

Supporting documentation: If you have attached relevant contracts, checks, or other documents to your Proof of Claim, please check here: YES ☐ NO ☐

Part 5: Your Investments in Perris Freeway Partners, LP, Specialty Properties Partners, LP and/or Treehouse Investments, LP (Ownership Interests)

Complete this section if you entered into a transaction where you thought you were purchasing an **ownership or partnership interest** in any of the following entities, for which KSMP is the general partner:

- Perris Freeway Partners,
- LP, Specialty Properties Partners,
- LP and/or Treehouse Investments, LP.

If you did not invest directly in any of these entities, skip to Part 6.

Dates and amounts of investments made by you, your spouse, family member or related entity:

Entity in Which Investment Was Made	Name in Which Investment Was Made	Date of Investment	Amount Invested

Payments you, your spouse, family member or entity received from KSMP in relationship to these entities:

Who Issued the Payment (i.e., Perris Freeway, Specialty Properties, Treehouse or another entity)?	Who Received the Payment (i.e., you, your spouse, family member, IRA, living trust or family trust)?	Date of Payment	Amount Paid	Was the Payment Earmarked to a Particular Entity or Property?

Supporting documentation: Please attach any relevant contracts, checks, or other documents that are available.

Part 6: Claims Filed in the LeFever Mattson Debtors' Bankruptcy Cases

Complete this section if you (or a related entity, such as a spouse, family member, IRA, living trust, or family trust) filed a claim in the bankruptcy cases of the affiliated LeFever Mattson Debtors. A schedule of LeFever Mattson Debtors is provided in **Appendix B**. If not, skip to Part 7.

1. Did you or a related entity file a claim in the LeFever Mattson bankruptcy cases?

YES ☐ NO ☐

2. If yes, does that claim involve the same facts or circumstances as the claim you are asserting in this case?

YES ☐ NO ☐

3. If yes, please list the claim number(s) and/or attach a copy of the claim(s).

Part 7: Other Claims or Interests

If you believe you may have any other type of claim or interest in connection with KSMP, Perris Freeway Partners, LP, Specialty Properties Partners, LP or Treehouse Investments, LP—or any other entity that is affiliated with KSMP or Mr. Mattson that is not listed on Appendix B—that has not been covered above, please describe it here. This may include, but is not limited to, loans, unpaid loans, services, or other agreements.

[illegible]

Thank You

The Responsible Individual and her professionals greatly appreciate your time and effort in completing this voluntary questionnaire. Your willingness to share information will help us piece together KSMP's affairs and ensure that all creditors are treated as fairly as possible.

If you have any questions about this questionnaire, please email us at: KSMP@hoganlovells.com

Appendix A – ONLY FOR Ownership Investments in Real Property with KSMP (i.e., so-called Tenancy in Common or “TIC” Interests)

Investment 1:

1. Property

Address:

2. Name of Purchasing Entity:

3. Date of Ownership Investment and Amount(s) Invested (if more than one investment was made in a single property, please list the date and amount of each investment):

4. Amount(s) of Investment (if more than one investment was made, please list date):

5. Percent Ownership Interest You Believe You Hold:

6. Entity With Whom You Contracted to Purchased the Ownership Interest:

7. Was your investment part of a 1031 Exchange? YES ☐ NO ☐

If so, please provide:

The address of the property you exchanged out of: _____

The approximate date of the exchange: _____

[Whether any exchange intermediary remains involved in connection with your investment:

8. Subsequent Payments Made to KSMP (or other persons or entities) for Property Maintenance, Taxes or Other Expenses

Approximate Date	Payment	Amount	Form of Payment	Entity to Whom Payment Was Made

--	--	--	--

9. Did you receive any payments from KSMP (or any other person or entity) on account of your ownership interest?

Approximate Date	Payment	Amount	Form of Payment	Entity Which Made the Payment

Please indicate whether your purchase agreement is attached to any Proof of Claim you are filing in the KSMP bankruptcy. YES ☐ NO ☐

If you have not filed a Proof of Claim, please attach a copy of the purchase agreement to this Questionnaire so that we can make sure we know about your transaction, particularly if it does not appear on title.

If you have no other Ownership Investments in Real Property with KSMP to report, you have completed this Appendix. If you have others to report, please do so below. If you need additional pages beyond those provided, please feel free to print them and attach them to your mailed copy or upload them to your completed online questionnaire.

Investment 2:

1. Property

Address:

2. Name of Purchasing Entity:

3. Date of Ownership Investment and Amount(s) Invested (if more than one investment was made in a single property, please list the date and amount of each investment):

4. Amount(s) of Investment (if more than one investment was made, please list date):

5. Percent Ownership Interest You Believe You Hold:

6. Entity With Whom You Contracted to Purchased the Ownership Interest:

7. Was your investment part of a 1031 Exchange? YES ☐ NO ☐

If so, please provide:

The address of the property you exchanged out of: _____

The approximate date of the exchange: _____

[Whether any exchange intermediary remains involved in connection with your investment:

_____]

8. Subsequent Payments Made to KSMP (or other persons or entities) for Property Maintenance, Taxes or Other Expenses

Approximate Date	Payment	Amount	Form of Payment	Entity to Whom Payment Was Made

9. Did you receive any payments from KSMP (or any other person or entity) on account of your ownership interest?

Approximate Date	Payment	Amount	Form of Payment	Entity Which Made the Payment

Please indicate whether your purchase agreement is attached to any proof of claim you are filing in the KSMP bankruptcy. YES ☐ NO ☐

If you have not filed a proof of claim, please attach a copy of the purchase agreement to this Questionnaire so that we can make sure we know about your transaction, particularly if it does not appear on title.

Investment 3:

1. Property

Address:

2. Name of Purchasing Entity:

3. Date of Ownership Investment and Amount(s) Invested (if more than one investment was made in a single property, please list the date and amount of each investment):

4. Amount(s) of Investment (if more than one investment was made, please list date:

5. Percent Ownership Interest You Believe You Hold:

6. Entity With Whom You Contracted to Purchase the Ownership Interest:

7. Was 1. your investment part of a 1031 Exchange? YES ☐ NO ☐

If so, please provide:

The address of the property you exchanged out of: _____

The approximate date of the exchange: _____

[Whether any exchange intermediary remains involved in connection with your investment:
_____]

8. Subsequent Payments Made to KSMP (or other persons or entities) for Property Maintenance, Taxes or Other Expenses

Approximate Date	Payment	Amount	Form of Payment	Entity to Whom Payment Was Made

9. Did you receive any payments from KSMP (or any other person or entity) on account of your ownership interest?

Approximate Date	Payment	Amount	Form of Payment	Entity Which Made the Payment

Please indicate whether your purchase agreement is attached to any proof of claim you are filing in the KSMP bankruptcy. YES ☐ NO ☐
If you have not filed a proof of claim, please attach a copy of the purchase agreement to this Questionnaire so that we can make sure we know about your transaction, particularly if it does not appear on title.

EXHIBIT A-3

Publication Notice

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SANTA ROSA DIVISION

4
5 In re
6 LEFEVER MATTSON, a California
7 corporation, et al.
8 Debtors.¹

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

9 In re
10 KS MATTSON PARTNERS, LP,
11 Debtor.

NOTICE OF BAR DATE AND
PROCEDURES FOR SUBMITTING PROOFS
OF CLAIM

12 TO: ALL CREDITORS THAT HELD A CLAIM AGAINST KSMP AS OF THE
13 NOVEMBER 22, 2024, PETITION DATE:

14 THE GENERAL BAR DATE FOR CLAIMS IS
15 OCTOBER 3, 2025
16 AT 11:59 P.M. (PREVAILING PACIFIC TIME)

17 PLEASE TAKE NOTICE OF THE FOLLOWING:

18 On August [●], 2025, the Bankruptcy Court entered an order setting deadlines (called “Bar
19 Dates”) for filing claims in the chapter 11 case of KS Mattson Partners., LP (defined herein as
20 “Debtor KSMP” or “KSMP”).

21 The questions and answers below explain what the Bar Dates mean, who must file a claim, and
22 how to do so.

23
24 ¹ The last four digits of LeFever Mattson’s tax identification number are 7537. The last four digits of the
25 tax identification number for KS Mattson Partners, LP (“KSMP”) are 5060. KSMP’s address for service
26 is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever
27 Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. Due to the large
28 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>.

Want More Information or Need Help? Attend Our Town Hall!

KSMP will host a town hall via Zoom on [●] at [●] [a.m. / p.m.] to discuss the process of completing and submitting proofs of claim. Information regarding the town hall can be found on the Claims Agent's website at: <https://veritaglobal.net/lm/info/14065>.

In the meantime, if you need help understanding the Proof of Claim, or the submission process, please contact KSMP's counsel on KSMP@hoganlovells.com.

1. WHAT DOES THE TERM BAR DATE MEAN?

The Bar Date is the date by which individuals and entities who assert a Claim against KSMP must submit a proof of claim with the Claims Agent in the manner indicated below.

2. WHAT IS A PROOF OF CLAIM?

A Proof of Claim is the paperwork you submit to state the amount and nature of your claim in KSMP's bankruptcy case. It consists of:

- Form 410 (Official Proof of Claim Form), which must be completed and signed, and
- Supporting documents that show the basis for your claim.

For some creditors, a Proof of Claim may also include the Voluntary Questionnaire, if you choose to complete it.

Why it matters: Filing a Proof of Claim ensures your claim is recognized and considered in the bankruptcy case. If you do not file your claim by the Bar Date, you may lose the right to pursue it.

3. WHO DOES THIS NOTICE APPLY TO AND WHEN IS THE DEADLINE?

This Notice applies to anyone who may have a claim against KSMP. This Notice does not apply to those who only have claims against the LeFever Mattson Debtors or any other individual or entity affiliated with KSMP.

- **For creditors other than governmental entities:** The Bar Date is **October 3, 2025 at 11:59 p.m. Pacific Time**. This includes:
 - Claims that arose before November 22, 2024 (the petition date); and
 - Claims that arose in the **ordinary course of business** between November 22, 2024 and June 9, 2025.

- **For governmental creditors (such as tax authorities):** The Bar Date is **December 8, 2025 at 11:59 p.m. Pacific Time.**

This Notice does not apply to claims that arose after June 9, 2025. Those claims will be addressed separately later.

4. DO YOU NEED TO SUBMIT A PROOF OF CLAIM?

You must file a Proof of Claim if:

- Your claim is not listed in KSMP's schedules of assets and liabilities (available on the Claims Agent's website at Docket No. 1980); or
- Your claim is listed in those schedules, but it is marked as contingent, unliquidated, or disputed.

If you are unsure whether you need to file, it is safest to file a proof of claim by the deadline.

5. WHAT ARE THE CONSEQUENCES OF NOT TIMELY AND PROPERLY SUBMITTING A PROOF OF CLAIM?

IF A CREDITOR WHO IS REQUIRED TO SUBMIT A PROOF OF CLAIM DOES NOT DO SO IN A TIMELY MANNER OR IN THE PROPER FORM, SUCH CREDITOR SHALL BE FOREVER BARRED, ESTOPPED, AND ENJOINED TO THE FULLEST EXTENT ALLOWED BY APPLICABLE LAW FROM VOTING ON A PLAN OF REORGANIZATION, ASSERTING SUCH CLAIM IN KSMP'S BANKRUPTCY AND RECEIVING A DISTRIBUTION FROM THE KSMP ESTATE.

6. WHAT FORMS DO I NEED TO COMPLETE AND RETURN?

- 1) **Proof of Claim Form (Official Form 410):** This 3-page form is mandatory. All creditors must complete and return it by the deadline.
- 2) **Voluntary Questionnaire:** Certain creditors, called "Specialized Creditors" (explained below), are also asked to complete this form. It is not required, but it will help KSMP recreate its books and records and better understand the flow of funds between KSMP, the LeFever Mattson Debtors, and other third parties. KSMP believes that information gained through the Voluntary Questionnaire may expedite the resolution of this bankruptcy case—and, ultimately, distributions to creditors.

If you do not complete the Voluntary Questionnaire, your proof of claim will still be valid so long as your Proof of Claim Form (Official Form 410) is properly completed and filed on time.

5. WHO ARE "SPECIALIZED CREDITORS" AND DO I NEED TO COMPLETE THE VOLUNTARY QUESTIONNAIRE?

"Specialized Creditors" include:

- 1) Anyone who thinks they invested in a property with KSMP—even if their name isn't on the title—and believes they may have a claim related to that investment;
- 2) Anyone who invested in Perris Freeway Plaza, LP, Specialty Properties Partners, LP, and Treehouse Investments, LP (three entities managed by KSMP that are not in bankruptcy but are believed to have once owned real estate); and
- 3) Anyone who thinks they have a claim because KSMP sold them an investment in a property or entity.

As noted above, if you are a Specialized Creditor, you are asked (but not required) to complete the Voluntary Questionnaire in addition to your Proof of Claim Form.

If you are not a Specialized Creditor, you only need to complete the Proof of Claim Form.

6. WHERE CAN I GET A COPY OF THE PROOF OF CLAIM FORM AND VOLUNTARY QUESTIONNAIRE?

The forms are enclosed with this mailing. You can also get extra copies in the following ways:

- Download for free from the Claims Agent's website: <https://veritaglobal.net/LM>
- Request by email: KSMP@hoganlovells.com
- Call KSMP's Claims Agent: (877) 709-4751 (U.S./Canada) or +1 (424) 236-7231 (International)
- Download from the Bankruptcy Court's website (www.canb.uscourts.gov) – note: this requires a PACER account and a small fee.

7. HOW DO I SUBMIT MY PROOF OF CLAIM FORM?

You must complete and sign the enclosed Proof of Claim Form, attach any supporting documents, and make sure the Claims Agent **actually receives** it by October 3, 2025. You can submit your claim in one of two ways:

1. **Online:** Upload your form through Verita's website at: <https://veritaglobal.net>
2. **By mail, courier or hand delivery:**

KS Mattson Partners, LP Claims Processing Center
c/o KCC dba Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

Important notes:

- Do not send by fax or email—these will not be accepted.

- If you file a paper claim, you must submit an original signed copy.
- If you mail your proof of claim and want a stamped copy returned to you as proof of receipt, include a second copy (i.e., photocopy) of your submission plus a self-addressed, stamped envelope.
- If mailing, do not send original supporting documents—send copies only. The Claims Agent will scan and may destroy attachments.
- **Specialized Creditors:** Your claim may be treated as confidential if submitted through the Claims Agent. **If you file directly on the public court docket instead, it will not be confidential.**
- **DO NOT SEND IT TO KSMP, ITS LAWYERS, OR ITS PROFESSIONALS.**

8 REQUESTS FOR ADDITIONAL INFORMATION AND COOPERATION

If after receiving a Proof of Claim, KSMP determines that additional information is needed to process your Claim, KSMP may contact you by telephone, mail, or email to request such additional information.

Exhibit B

Redline

Richard L. Wynne (Bar No. 120349)
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Attorneys for Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

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

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

In re
KS MATTSON PARTNERS, LP,
Debtor.

**REVISED [PROPOSED] ORDER GRANTING
MOTION FOR AN ORDER (1)
ESTABLISHING BAR DATE; (2)
APPROVING FORM AND MANNER OF
NOTICE OF BAR DATE AND PROCEDURES
WITH RESPECT THERETO; AND (3)**

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/LM>.

**APPROVING CONFIDENTIALITY
PROTOCOLS**

Date: ~~TBD~~ August 26, 2025

Time: ~~TBD~~ 1:00 p.m.

Place: (In ~~Person~~ person or ~~Vi~~ via Zoom)
United States Bankruptcy Court
1300 Clay Street, Courtroom 215
Oakland, CA 94612

This matter coming before the Court on the *Motion for an Order (I) Establishing Bar Date; (2) Approving Form and Manner of Notice of Bar Date and Procedures With Respect Thereto; and (3) Approving Confidentiality Protocols* [Docket No. ~~1951~~ 1951] (the “Motion”),² filed by the above-captioned debtor (“Debtor KSMP” or “KSMP”); the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. ~~Investor and~~ Creditor Bar Date. ~~September 19~~ October 3, 2025 at 11:59 p.m. Pacific Time (the “General Bar Date”) is hereby established as the **last day** for ~~(a) all Investors to file Proofs of Interest in Debtor KSMP arising (or deemed to have arisen) prior to November 22, 2024 (the “Petition Date”)~~ and ~~(b) all~~ Creditors (other than governmental units) to file Proofs of Claim against Debtor KSMP arising (or deemed to have arisen) prior to November 22, 2024 (the “Petition Date”), including ~~requests for allowance and payment of claims under section 503(b)(9) of the Bankruptcy Code and~~ requests for allowance and payment of priority claims arising under sections ~~503~~ 507(a)(3) through (10) of the Bankruptcy Code.
3. Governmental Bar Date. December 8, 2025 at 11:59 p.m. Pacific Time (the “Governmental Bar Date” and, together with the General Bar Date, the “Bar Dates” and each, a “Bar Date”) is hereby established as the **last day** for governmental units to file Proofs of Claim against Debtor KSMP arising (or deemed to have arisen) prior to the Petition Date.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

1 4. Amended Schedules Bar Date. To the extent Debtor KSMP files an amendment to or
2 supplements its Schedules and Statements after the mailing of the Bar Date Notice, Debtor KSMP
3 shall provide notice of any such amendment or supplement to the holders of any Claims ~~and/or~~
4 ~~Interests~~ affected thereby within fourteen (14) calendar days of such filing. Holders of any Claims
5 ~~and/or Interests~~ affected by any such amendments must file any proofs of claim ~~and/or proofs of~~
6 ~~interest (including, with respect to any affected Investor)~~ with respect to such Claims ~~and/or Interests~~
7 on or before the later of (i) the applicable Bar Date and (ii) 11.59 p.m. (Pacific Time) on the
8 date that is 30 calendar days after the date on which notice is served.

9 5. Persons Not Required to File Claims. The following persons and other entities whose
10 claims ~~or interests~~ otherwise would be subject to the Bar Date are excepted from the provisions
11 herein and are **not** required to file proofs of claim against Debtor KSMP on or before the Bar Date:
12 (a) any person or entity whose Claim is listed on the Schedules and Statements and (i) whose Claim
13 is not described therein as “disputed,” “contingent,” or “unliquidated”; (ii) who does not dispute the
14 amount or nature of such Claim as set forth in the Schedules and Statements; and (iii) who does not
15 dispute that the Claim as listed in the Schedules and Statements is an obligation of Debtor KSMP;
16 (b) any person or entity that has already properly filed a proof of claim against Debtor KSMP with
17 the Clerk of this Court or the Claims Agent; (c) any person or entity whose Claim has been paid in
18 full by Debtor KSMP pursuant to the relief granted by an order of the Court or otherwise; (d) any
19 ~~holder of a Claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an~~
20 ~~expense of administration of Debtor KSMP’s estate, except for a holder of a Claim arising under~~
21 ~~section 503(b)(9) of the Bankruptcy Code (which Claim must be asserted prior to the Investor and~~
22 ~~Creditor Bar Date); (e) any person or entity who holds a Claim that has been allowed by a final order~~
23 ~~of the Court entered on or before the applicable Bar Date; and (f) any holder of a Claim for which a~~
24 ~~separate deadline is fixed by the Court; (g) any professionals retained by Debtor KSMP (or any~~
25 ~~official committee appointed in this chapter 11 case) pursuant to orders of the Court who assert~~
26 ~~administrative claims for fees and expenses subject to the Court’s approval pursuant to sections 328,~~
27 ~~330, and 331 of the Bankruptcy Code; and (h) any Claim for fees relating to KSMP’s chapter 11 case~~
28 ~~under 28 U.S.C. § 1930.~~

1 6. Any ~~Proof of Interest or~~ Proof of Claim required to be filed pursuant to the provisions
2 of this Order and not filed on or before the applicable Bar Date shall be forever barred from assertion
3 against Debtor KSMP, Debtor KSMP's estates, and any successor to the foregoing under a
4 confirmed plan of reorganization and/or liquidation or structured dismissal or otherwise (a
5 "Confirmed Plan"), and the holder of such ~~Interest or~~ Claim shall be forever barred and prohibited
6 from participating in any distribution in this chapter 11 case, including, but not limited to, any
7 distribution under a Confirmed Plan or in a subsequent chapter 7 liquidation of Debtor KSMP's
8 estate.

9 ~~7. Approval of Procedures and Forms. The Proof of Interest Procedures, Investor~~
10 ~~Confidentiality Protocols, and Proof of Interest Form, attached hereto as Exhibit A-2, are approved.~~

11 ~~8. The Investor Claims Package, which consists of the Bar Date Notice, Proof of Interest~~
12 ~~Form (including accompanying instructions), and Official Form 410, is approved. The Investor~~
13 ~~Claims Packages shall be sent for distribution on or before the Service Deadline.~~

14 7. Approval of Specialized Creditor Confidentiality Protocol. The "Specialized Creditor
15 Confidentiality Protocol", which shall apply to any Proofs of Claim filed by and/or Voluntary
16 Questionnaire submitted by any person, trust, partnership, corporation or other entity (i) that asserts a
17 Claim against Debtor KSMP arising out of an ownership interest in real property owned or formerly
18 owned by Debtor KSMP, even if such person, trust, partnership, corporation or other entity is not
19 listed on title; (ii) arising out of an investment in any other property or entity that was sold to them
20 by Debtor KSMP; or (iii) that is a current or former investor in Perris Freeway Plaza, LP, Specialty
21 Properties Partners, LP, and Treehouse Investments, LP—entities for which KSMP serves as the
22 general partner (each, a "Specialized Creditor"), is approved. The Specialized Creditor
23 Confidentiality Protocol is as follows:

24 a) Specialized Creditors are directed not to file a Proof of Claim Form with
25 the Court. Instead, all such forms must be sent to the Claims Agent.

26 b) Specialized Creditor Proofs of Claim (including any attachments thereto)
27 will not be available to the general public and will not be able to be accessed on the
28 Claims Agent Website. However, the following information (and only the following
information) will be posted on the Claims Agent Website, whether such information is

1 included on the Schedules and Statements or in a submitted Proof of Claim Form: (a)
2 name of the Creditor; and (b) amount of the asserted Claim.

3 c) The Specialized Creditor Confidentiality Protocol is for the benefit of the
4 Specialized Creditors. Accordingly, Specialized Creditors may elect to make any
5 information included in their own Proof of Claim Form public; *provided, however,* that
6 any such disclosure shall not constitute a blanket waiver of confidentiality of all other
7 information contained in or attached to such form and no other party may disclose any
8 information from such form, except to Permitted Parties (as defined below).

9 d) Specialized Creditor Proofs of Claim and the information contained
10 thereon and attached thereto shall be held and treated as confidential by Debtor KSMP,
11 Debtor KSMP's counsel, and the Claims Agent and copies thereof may be provided to
12 the parties listed below (the "Permitted Parties"). No party, including a Permitted Party,
13 may obtain copies of Proof of Claim unless such party executes a confidentiality
14 agreement in a form agreeable to Debtor KSMP. Permitted Parties shall keep
15 confidential and not disclose the contents of any Specialized Creditor Proof of Claim
16 except as otherwise provided herein or by order of the Court.

17 8. The "Permitted Parties" are as follows:

18 a) The Office of the United States Trustee (the "UST");

19 b) Counsel and other professionals for Debtor KSMP retained pursuant to an
20 order of the Court, including partners, counsel, associates, and employees of such
21 professionals;

22 c) Counsel and other professionals for the LFM Debtors retained pursuant to
23 an order of the Court, including partners, counsel, associates, and employees of such
24 professionals;

25 d) Counsel and other professionals for the LFM Committee retained pursuant
26 to an order of the Court, including partners, counsel, associates, and employees of such
27 professionals;

28 e) Members of the LFM Committee;

f) Any mediator appointed pursuant to an order of the Court;

g) Any trustee, or functional equivalent thereof, appointed to administer
payments to Specialized Creditors, including pursuant to any plan;

h) Persons who are permitted access to one or more Proofs of Claim upon
stipulation of the Specialized Creditor that submitted such form(s), after prior notice to
counsel to Debtor KSMP and a reasonable opportunity to object; and

i) Such other persons as the Court allows after notice and an opportunity for
hearing; *provided, however,* that any such determination shall be made on no less than
fourteen days' prior notice to affected Specialized Creditors; and

j) Socotra Capital, Inc., and its counsel and other professionals, also shall be designated a Permitted Party, subject to execution of a confidentiality agreement or protective order similar in form and substance to that stipulated protective order in place in the LFM Chapter 11 Cases.

9. Approval of Bar Date Notice. The Bar Date Notice, in substantially the form attached hereto as **Exhibit A-1**, is approved in all respects. In accordance with Bankruptcy Rule 2002, Debtor KSMP is hereby authorized to cause the Bar Date Notice to be given as part of the Creditor Claims Package (as defined below) by first class mail, postage prepaid, on or before one week following the entry of this order (the “Service Deadline”); ~~upon: (a) all persons that are Direct Notice Investors; (b) all known creditors; and (c) the Office of the United States Trustee.~~

10. Approval of Voluntary Questionnaire. The voluntary questionnaire for Specialized Creditors, in substantially the form attached hereto as Exhibit A-2 (the “Voluntary Questionnaire”), is approved. The Voluntary Questionnaire, which shall not be posted on the Court docket or made part of the official Proof of Claim, is entirely optional. Failure to complete a Voluntary Questionnaire shall not invalidate a properly and timely filed Proof of Claim. KSMP is hereby authorized to cause the Voluntary Questionnaire to be served as part of the Creditor Claims Package (as defined below) by first class mail, postage prepaid, on or before the Service Deadline.

11. The creditor claims package (the “Creditor Claims Package”), which consists of the Bar Date Notice, the Voluntary Questionnaire and Official Form 410, is approved. The Creditor Claims Packages shall be sent for distribution on or before the Service Deadline. The Creditor Claims Package shall be served by first-class mail and e-mail (where known) on all (1) Specialized Creditors, (2) other known KSMP creditors, (3) and the Office of the United States Trustee. The Creditor Claims Package may also be served on all persons that (x) that according to the LFM Debtors’ books and records, were current and/or former investors in the LFM Debtors, (y) received notice of the bar date in the LFM Chapter 11 Cases as “Identified Potential Investors,” or (z) filed proofs of interest or proofs of claim as “Investors” in the LFM Chapter 11 Cases.

12. ~~10.~~ If multiple ~~Investor Claims~~ Creditor Claim Packages would otherwise go to the same physical address, Debtor KSMP shall be entitled, but not required, to combine the ~~Investor~~

ClaimsCreditor Claim Packages into a single ~~Investor-Claims~~Creditor Claim Package, even if the ~~Investor~~creditor names are not identical.

13. ~~11.~~ Publication of Bar Date Notice. ~~The~~ Debtor KSMP shall cause notice of the Bar Date to be given by publication to ~~investors and~~ creditors to whom notice by mail is impracticable, including ~~investors and~~ creditors who are unknown or not reasonably ascertainable by Debtor KSMP ~~and investors~~ and creditors whose identities are known but whose addresses are unknown by Debtor KSMP. Specifically, Debtor KSMP shall cause the Publication Notice, in substantially the form attached hereto as **Exhibit A-3**, to be published in (a) one occasion of *USA Today* (or similar national newspaper), (b) one occasion of the *Sacramento Bee* (or similar regional newspaper), and (c) one occasion of *The Press Democrat* (or similar Sonoma / Napa local publication), on or before a date at least fourteen days before the Bar Date.

14. ~~12.~~ Adequate and Sufficient Notice. Notice of the Bar Date as set forth in this order and in the manner set forth herein (including, but not limited to, the Bar Date Notice, the Publication Notice, and any supplemental notices that Debtor KSMP may send from time to time) constitutes adequate and sufficient notice of the Bar Date and satisfies the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.

15. ~~13.~~ Authorization. The Debtor is authorized to take or refrain from taking any action necessary or appropriate to implement the terms of and the relief granted in this Order without seeking further order of the Court.

16. ~~14.~~ ~~The~~ Debtor KSMP is authorized to make non-substantive changes to the documents referenced herein without further order of the Court, including, without limitation, changes to correct typographical and grammatical errors and to make conforming changes among the aforementioned documents prior to their distribution.

17. ~~15.~~ Jurisdiction. This Court shall retain jurisdiction over all matters related to or arising from the Motion or the interpretation or implementation of this Order.

*** **END OF ORDER** ***

EXHIBIT A-1

Bar Date Notice

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SANTA ROSA DIVISION

4
5 In re
6 LEFEVER MATTSON, a California
7 corporation, et al.
8 Debtors.¹

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

9 In re
10 KS MATTSON PARTNERS, LP,
11 Debtor.

NOTICE OF BAR DATE AND
PROCEDURES FOR SUBMITTING PROOFS
OF CLAIM

12 TO: ALL CREDITORS THAT HELD A CLAIM AGAINST KSMP AS OF THE
13 NOVEMBER 22, 2024, PETITION DATE:

PLEASE TAKE NOTICE OF THE FOLLOWING:

14 On August [●], 2025, the Bankruptcy Court entered an order (~~the~~setting deadlines (called
15 "Bar Date Order Dates") for filing claims in the chapter 11 ~~bankruptcy~~ case of KS Mattson Partners.,
16 LP (defined herein as "Debtor KSMP" or "KSMP") ~~in accordance with Bankruptcy Rule 3003(c)~~
17 ~~fixing the deadline for all Creditors to file proofs of claim on account of their claims against KSMP.~~
18 Pursuant to the Bar Date Order, (a) September 19, 2025 at 11:59 p.m. (Pacific Time) is the deadline (the
19 "General Bar Date") by which the Claims Agent must actually receive proofs of claim submitted
20 Creditors (other than governmental units) in this chapter 11 case for any Claim arising (or deemed to have
21 arisen) prior to November 22, 2024 (the "Petition Date"), and (b) December 8, 2025 at 11:59 p.m.
22 (Pacific Time) is the deadline (the "Governmental Bar Date" and, together with the General Bar Date, the
23 "Bar Dates" and each, a "Bar Date") by which the Claims Agent must actually receive proofs of claim
24 submitted by governmental units in this chapter 11 case for any Claim arising (or deemed to have arisen)
25 prior to the Petition Date.

26 ¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the
27 tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for
28 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/LM>.

The questions and answers below explain what the Bar Dates mean, who must file a claim, and how to do so.

Want More Information or Need Help ~~for Creditors~~? Attend Our Town Hall!

KSMP will host a town hall via Zoom on [●] at [●] [a.m. / p.m.] to discuss the process of completing and submitting proofs of claim. ~~You will receive a separate notice of this town hall once it is scheduled. In addition,~~ Information regarding the town hall information will be posted can be found on the Claims Agent's website at: <https://veritaglobal.net/lm/info/14065>.

In the meantime, if you need help understanding the Proof of Claim, or the submission process, please contact KSMP's counsel on KSMP@hoganlovells.com.

1. ~~1.~~ WHAT DOES THE TERM BAR DATE MEAN?

The Bar Date is the date by which individuals and entities who assert a Claim against KSMP must submit a proof of claim with the Claims Agent in the manner indicated below.

2. ~~2.~~ ~~DO YOU NEED TO SUBMIT~~ WHAT IS A PROOF OF CLAIM?

~~If you assert a Claim against KSMP that is either (a) not reflected on KSMP's schedules of assets and liabilities or statement of financial affairs (the "Schedules and Statements") or (b) reflected on KSMP's Schedules and Statements as contingent / unliquidated / disputed, then you MUST submit a proof of claim by the General Bar Date. This includes any Claim (i) for goods delivered to KSMP within the 20 days before the Petition Date or (ii) arising in the ordinary course of business for the period between the Petition Date and June 9, 2025 (the date of the order for relief in KSMP's chapter 11 case).~~

A Proof of Claim is the paperwork you submit to state the amount and nature of your claim in KSMP's bankruptcy case. It consists of:

- Form 410 (Official Proof of Claim Form), which must be completed and signed, and
- Supporting documents that show the basis for your claim.

For some creditors, a Proof of Claim may also include the Voluntary Questionnaire, if you choose to complete it.

Why it matters: Filing a Proof of Claim ensures your claim is recognized and considered in the bankruptcy case. If you do not file your claim by the Bar Date, you may lose the right to pursue it.

3. WHO DOES THIS NOTICE APPLY TO AND WHEN IS THE DEADLINE?

This Notice applies to anyone who may have a claim against KSMP. This Notice does not apply to those who only have claims against the LeFever Mattson Debtors or any other individual or entity affiliated with KSMP.

- For creditors other than governmental entities: The Bar Date is October 3, 2025 at 11:59 p.m. Pacific Time. This includes:
 - Claims that arose before November 22, 2024 (the petition date); and
 - Claims that arose in the ordinary course of business between November 22, 2024 and June 9, 2025.
- For governmental creditors (such as tax authorities): The Bar Date is December 8, 2025 at 11:59 p.m. Pacific Time.

This Notice does not apply to claims that arose after June 9, 2025. Those claims will be addressed separately later.

4. DO YOU NEED TO SUBMIT A PROOF OF CLAIM?

You must file a Proof of Claim if:

- Your claim is not listed in KSMP's schedules of assets and liabilities (available on the Claims Agent's website at Docket No. 1980); or
- Your claim is listed in those schedules, but it is marked as contingent, unliquidated, or disputed.

If you are unsure whether you need to file, it is safest to file a proof of claim by the deadline.

5. ~~3.~~ WHAT ARE THE CONSEQUENCES OF NOT TIMELY AND PROPERLY SUBMITTING A PROOF OF CLAIM?

IF A CREDITOR WHO IS REQUIRED TO SUBMIT A PROOF OF CLAIM, ~~SO THAT IT IS ACTUALLY RECEIVED BY THE CLAIMS AGENT ON OR BEFORE THE BAR DATE, FAILS TO~~ DOES NOT DO SO IN A TIMELY MANNER OR IN THE PROPER FORM, SUCH CREDITOR SHALL BE FOREVER BARRED, ESTOPPED, AND ENJOINED TO THE FULLEST EXTENT ALLOWED BY APPLICABLE LAW FROM VOTING ON A PLAN OF REORGANIZATION, ASSERTING SUCH CLAIM IN KSMP'S BANKRUPTCY AND RECEIVING A DISTRIBUTION FROM THE KSMP ESTATE.

~~4. WHERE CAN I GET A COPY OF THE PROOF OF CLAIM FORM?~~

~~For Creditors, enclosed with this Bar Date Notice is a blank Proof of Claim Form and (in the case of Alleged Victims) a Voluntary Questionnaire.~~

6. WHAT FORMS DO I NEED TO COMPLETE AND RETURN WITH THIS NOTICE?

You will find two forms enclosed:

- 1) **Proof of Claim Form (Official Form 410):** This 3-page form is mandatory. All creditors **must** complete and return it by the deadline.
- 2) **Voluntary Questionnaire:** Certain creditors, called “Specialized Creditors” (explained below), are also asked to complete this form. It is not required, but it will help KSMP recreate its books and records and better understand the flow of funds between KSMP, the LeFever Mattson Debtors, and other third parties. KSMP believes that information gained through the Voluntary Questionnaire may expedite the resolution of this bankruptcy case—and, ultimately, distributions to creditors.

~~Copies of this Bar Date Notice, a blank~~ If you do not complete the Voluntary Questionnaire, your proof of claim will still be valid so long as your Proof of Claim Form (Official Bankruptcy Form 410) and the Voluntary Questionnaire may be obtained (i) for a fee, on the Bankruptcy Court’s website, www.canb.uscourts.gov (a PACER account is required); (ii) for free at the Claims Agent’s website at <https://veritaglobal.net/LM>, (iii) by emailing KSMP@hoganlovells.com or (iv) contacting the Form 410) is properly completed and filed on time.

7. WHO ARE “SPECIALIZED CREDITORS” AND DO I NEED TO COMPLETE THE VOLUNTARY QUESTIONNAIRE?

“Specialized Creditors” include:

- 1) Anyone who thinks they invested in a property with KSMP—even if their name isn’t on the title—and believes they may have a claim related to that investment;
- 2) Anyone who invested in Perris Freeway Plaza, LP, Specialty Properties Partners, LP, and Treehouse Investments, LP (three entities managed by KSMP that are not in bankruptcy but are believed to have once owned real estate); and
- 3) Anyone who thinks they have a claim because KSMP sold them an investment in a property or entity.

As noted above, if you are a Specialized Creditor, you are asked (but not required) to complete the Voluntary Questionnaire in addition to your Proof of Claim Form.

If you are not a Specialized Creditor, you only need to complete the Proof of Claim Form.

8. WHERE CAN I GET A COPY OF THE PROOF OF CLAIM FORM AND VOLUNTARY QUESTIONNAIRE?

The forms are enclosed with this mailing. You can also get extra copies in the following ways:

- Download for free from the Claims Agent’s website: <https://veritaglobal.net/LM>
- Request by email: KSMP@hoganlovells.com
- Call KSMP’s ~~claims agent at~~ Claims Agent: (877) 709-4751 (U.S./Canada) or +1 (424) 236-7231 (International)-

- Download from the Bankruptcy Court's website (www.canb.uscourts.gov) – note: this requires a PACER account and a small fee.

9. ~~5.~~ **HOW DO I SUBMIT MY PROOF OF CLAIM FORM?**

~~A properly completed and signed Proof of Claim Form, together with supporting documentation, must be submitted to the Claims Agent so **they are actually received on or before the Bar Date**, in one of the following ways:~~

You must complete and sign the enclosed Proof of Claim Form, attach any supporting documents, and make sure the Claims Agent **actually receives** it by October 3, 2025. You can submit your claim in one of two ways:

1. ~~Electronically uploaded~~ **Online:** Upload your form through Verita's website at:
~~https://veritaglobal.net/LM~~ <https://veritaglobal.net>

~~**If Proof of Claim Form is sent by mail, Courier or Hand Delivery, send to:**~~

2. **By mail, courier or hand delivery:**

KS Mattson Partners, LP Claims Processing Center
c/o KCC dba Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

Important notes:

- Do not send by fax or email—these will not be accepted.

~~Faeximile and e-mail delivery methods are not acceptable. **If submitting by hard copy, you must submit an originally executed Proof of Claim. If you file an originally executed Proof of Claim and would like a copy of your Proof of Claim returned to you as proof of receipt, please enclose an additional copy and a self-addressed postage paid envelope.**~~

~~If you are mailing the Proof of Claim, **do not** include **original** copies of any documents attached to the Proof of Claim, as they may be destroyed after being scanned by the Claims Agent.~~

~~**PROOFS OF CLAIM SHOULD NOT BE FILED WITH THE COURT, OR SENT TO KSMP'S LEGAL COUNSEL, RETAINED PROFESSIONALS, OR OTHERWISE DELIVERED TO KSMP, AND ANY SUCH FORMS SO FILED OR SENT WILL NOT BE CONSIDERED PROPERLY SUBMITTED.**~~

- If you file a paper claim, you must submit an original signed copy.
- If you mail your proof of claim and want a stamped copy returned to you as proof of receipt, include a second copy (i.e., photocopy) of your submission plus a self-addressed, stamped envelope.

- If mailing, do not send original supporting documents—send copies only. The Claims Agent will scan and may destroy attachments.
- **Specialized Creditors:** Your claim may be treated as confidential if submitted through the Claims Agent. **If you file directly on the public court docket instead, it will not be confidential.**
- **DO NOT SEND IT TO KSMP, ITS LAWYERS, OR ITS PROFESSIONALS.**

10. ~~6.~~ **REQUESTS FOR ADDITIONAL INFORMATION AND COOPERATION**

If after receiving a Proof of Claim, KSMP determines that additional information is needed to process your Claim, KSMP may contact you by telephone, mail, or email to request such additional information.

11. ~~7.~~ **RESERVATION OF RIGHTS**

~~KSMP reserves the right to dispute, or assert offsets or defenses as to the extent, validity, priority, or otherwise against, any amounts asserted in any Proof of Claim. Nothing set forth in this Bar Date Notice, a Proof of Claim, or the accompanying schedules thereto, shall preclude KSMP from objecting to any Proof of Claim, on any ground.~~

Filing a Proof of Claim does not mean your claim will automatically be allowed. KSMP reserves all rights to review and challenge any Proof of Claim, including the right to dispute the amount, validity, priority, or extent of the claim, or to assert any applicable offsets or defenses. Nothing in this Bar Date Notice, in any Proof of Claim, or in the related schedules limits KSMP's ability to object to any Proof of Claim on any ground.

EXHIBIT A-2

~~Proof of Interest Form~~

Voluntary Questionnaire

No redline

New Exhibit A-2 replaces old Exhibit A-2

EXHIBIT A-3

Publication Notice

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

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

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

In re
KS MATTSON PARTNERS, LP,
Debtor.

**NOTICE OF BAR DATE AND
PROCEDURES FOR SUBMITTING (A)
~~INVESTOR PROOFS OF INTEREST AND (B)~~
~~PROOFS OF CLAIM~~**

**TO: ALL ~~INVESTORS AND~~ CREDITORS THAT HELD ~~AN INVESTMENT OR A~~ CLAIM
~~IN OR~~ AGAINST KSMP AS OF THE NOVEMBER 22, 2024, PETITION DATE:**

THE GENERAL BAR DATE FOR ~~INTERESTS AND~~ CLAIMS IS
~~SEPTEMBER 19~~ OCTOBER 3, 2025
AT 11:59 P.M. (PREVAILING PACIFIC TIME)

PLEASE TAKE NOTICE OF THE FOLLOWING:

On August [●], 2025, the Bankruptcy Court entered an order (~~the~~ setting deadlines (called
“Bar Date Order Dates”) for filing claims in the chapter 11 ~~bankruptcy~~ case of KS Mattson Partners.,
LP (defined herein as “Debtor KSMP” or “KSMP”) ~~in accordance with Bankruptcy Rule 3003(e)~~
~~fixing the deadline (a) for all Investors to file proofs of interest on account of their investments in KSMP~~
~~and (b) for all Creditors to file proofs of claim on account of their claims against KSMP. Pursuant to the~~
~~Bar Date Order, (a) September 19, 2025 at 11:59 p.m. (Pacific Time) is the deadline (the “General Bar~~

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/LM>.

1 Date”) by which the Claims Agent ~~must actually receive~~ proofs of interest and proofs of claim submitted
2 by Investors and Creditors (other than governmental units) in this chapter 11 case for any Interest or Claim
3 arising (or deemed to have arisen) prior to November 22, 2024 (the “Petition Date”), and (b) ~~December 8,~~
4 ~~2025 at 11:59 p.m. (Pacific Time)~~ is the deadline (the “Governmental Bar Date” and, together with the
General Bar Date, the “Bar Dates” and each, a “Bar Date”) by which the Claims Agent ~~must actually~~
~~receive~~ proofs of interest and proofs of claim submitted by governmental units in this chapter 11 case for
any Claim arising (or deemed to have arisen) prior to the Petition Date.

5 The questions and answers below explain what the Bar Dates mean, who must file a claim, and
6 how to do so.

7 **Want More Information or Need Help ~~for Investors~~ ? Attend Our Town**
8 **Hall!**

9 KSMP will host ~~an investor~~a town hall via Zoom on [●] at [●] [a.m. / p.m.] to
10 discuss the process of completing and submitting ~~Proofs of Interest. You will~~
~~receive a separate notice of this town hall once it is scheduled. In addition,~~proofs of claim.
11 Information regarding the town hall ~~information will be posted~~can be found on
12 the Claims Agent’s website at: <https://veritaglobal.net/lm/info/14065>.

13 ***In the meantime, if you need help understanding the ~~Proof of Interest, Proof~~***
14 ***of Claim, or the submission process, please contact KSMP’s counsel on***
15 ***KSMP@hoganlovells.com.***

16 **1. ~~1.~~ WHAT DOES THE TERM BAR DATE MEAN?**

17 ~~**Investors.** For investors, the Bar Date is the date by which individuals and entities who invested~~
18 ~~in KSMP, whether through deeds of trust on KSMP-owned property, or as tenants in common, must~~
~~submit a proof of interest with the Claims Agent in the manner indicated below.~~

19 ~~**Creditors.** For creditors, the~~The Bar Date is the date by which individuals and entities who
20 assert a Claim against KSMP must submit a proof of claim with the Claims Agent in the manner
indicated below.

21 **2. ~~2.~~ DO YOU NEED TO SUBMIT WHAT IS A PROOF OF**
22 **INTEREST CLAIM?**

23 ~~All investors that assert an interest in KSMP **MUST submit a proof of interest by the Bar Date.**~~
24 ~~Any investor that filed a proof of claim or proof of interest against one of the debtors (the “LFM Debtors”)~~
25 ~~in the LeFever Mattson chapter 11 cases (the “LFM Chapter 11 Cases”) will receive a Proof of Interest~~
26 ~~form that lists each such proof of claim or interest and will receive the opportunity to indicate whether~~
27 ~~they wish that proof of claim or proof of interest also to be deemed filed in KSMP’s chapter 11 case.~~

28 A Proof of Claim is the paperwork you submit to state the amount and nature of your claim
in KSMP’s bankruptcy case. It consists of:

- Form 410 (Official Proof of Claim Form), which must be completed and signed,
and

- Supporting documents that show the basis for your claim.

For some creditors, a Proof of Claim may also include the Voluntary Questionnaire, if you choose to complete it.

Why it matters: Filing a Proof of Claim ensures your claim is recognized and considered in the bankruptcy case. If you do not file your claim by the Bar Date, you may lose the right to pursue it.

3. WHO DOES THIS NOTICE APPLY TO AND WHEN IS THE DEADLINE?

This Notice applies to anyone who may have a claim against KSMP. This Notice does not apply to those who only have claims against the LeFever Mattson Debtors or any other individual or entity affiliated with KSMP.

- **For creditors other than governmental entities:** The Bar Date is **October 3, 2025 at 11:59 p.m. Pacific Time**. This includes:

- Claims that arose before November 22, 2024 (the petition date); and
- Claims that arose in the **ordinary course of business** between November 22, 2024 and June 9, 2025.

- **For governmental creditors (such as tax authorities):** The Bar Date is **December 8, 2025 at 11:59 p.m. Pacific Time**.

This Notice does not apply to claims that arose after June 9, 2025. Those claims will be addressed separately later.

4. ~~3.~~ DO YOU NEED TO SUBMIT A PROOF OF CLAIM?

~~If you assert a Claim against KSMP that is either (a) not reflected on KSMP's schedules of assets and liabilities or statement of financial affairs (the "Schedules and Statements") or (b) reflected on KSMP's Schedules and Statements as contingent / unliquidated / disputed, then you **MUST** submit a proof of claim by the General Bar Date.~~

You must file a Proof of Claim if:

- Your claim is not listed in KSMP's schedules of assets and liabilities (available on the Claims Agent's website at Docket No. 1980); or
- Your claim is listed in those schedules, but it is marked as contingent, unliquidated, or disputed.

If you are unsure whether you need to file, it is safest to file a proof of claim by the deadline.

~~If you are an Investor and you assert a Claim against KSMP (which may be in addition to the Interest you assert in KSMP), you **MUST** submit a proof of claim by the General Bar Date.~~

The following claims, administrative requests, and interests are excepted from the provisions of the Bar Date Order (the “Excepted Claims/Interests”) and are not required to be filed on or before the Bar Date: (a) any person or entity whose Claim is listed on the Schedules and Statements and (i) whose Claim is not described therein as “disputed,” “contingent,” or “unliquidated”; (ii) who does not dispute the amount or nature of such Claim as set forth in the Schedules and Statements; and (iii) who does not dispute that the Claim as listed in the Schedules and Statements is an obligation of Debtor KSMP; (b) any person or entity that has already properly filed a proof of claim against Debtor KSMP with the Clerk of this Court or the Claims Agent (*NOTE: if you have filed a claim in the LFM Chapter 11 Cases, that claim will not be deemed filed in KSMP’s chapter 11 case; you must file such claim against KSMP by the Bar Date*); (c) any person or entity whose Claim has been paid in full by Debtor KSMP pursuant to the relief granted by an order of the Bankruptcy Court or otherwise; (d) any holder of a Claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an expense of administration of Debtor KSMP’s estate, *except* for a holder of a Claim arising under section 503(b)(9) of the Bankruptcy Code (which Claim must be asserted prior to the Investor and Creditor Bar Date); (e) any person or entity who holds a Claim that has been allowed by a final order of the Bankruptcy Court entered on or before the applicable Bar Date; (f) any holder of a Claim for which a separate deadline is fixed by the Bankruptcy Court; (g) any professionals retained by Debtor KSMP (or any official committee appointed in this chapter 11 case) pursuant to orders of the Bankruptcy Court who assert administrative claims for fees and expenses subject to the Bankruptcy Court’s approval pursuant to sections 328, 330, and 331 of the Bankruptcy Code; (h) any Claim for fees relating to KSMP’s chapter 11 case under 28 U.S.C. § 1930; and (i) *claims of any investors in an entity other than KSMP*. Should the Bankruptcy Court fix a date by which the Excepted Claims/Interest must be filed, you will be notified separately.

5. 4. WHAT ARE THE CONSEQUENCES OF NOT TIMELY AND PROPERLY SUBMITTING A PROOF OF ~~INTEREST OR~~ CLAIM?

~~ANY INVESTOR OR IF A CREDITOR WHO IS REQUIRED TO SUBMIT A PROOF OF INTEREST OR PROOF OF CLAIM, AS APPLICABLE, SO THAT IT IS ACTUALLY RECEIVED BY THE CLAIMS AGENT ON OR BEFORE THE BAR DATE. IF AN INVESTOR OR CREDITOR FAILS TO CLAIM DOES NOT~~ DO SO IN A TIMELY MANNER OR IN THE PROPER FORM, SUCH ~~INVESTOR OR~~ CREDITOR SHALL BE FOREVER BARRED, ESTOPPED, AND ENJOINED TO THE FULLEST EXTENT ALLOWED BY APPLICABLE LAW FROM VOTING ON A PLAN OF REORGANIZATION, ASSERTING SUCH CLAIM OR INTEREST IN KSMP’S BANKRUPTCY AND RECEIVING A DISTRIBUTION FROM THE KSMP ESTATE.

6. WHAT FORMS DO I NEED TO COMPLETE AND RETURN?

- 1) Proof of Claim Form (Official Form 410): This 3-page form is mandatory. All creditors must complete and return it by the deadline.
- 2) Voluntary Questionnaire: Certain creditors, called “Specialized Creditors” (explained below), are also asked to complete this form. It is not required, but it will help KSMP recreate its books and records and better understand the flow of funds between KSMP, the LeFever Mattson Debtors, and other third parties. KSMP believes that information gained through the Voluntary Questionnaire may expedite the resolution of this bankruptcy case—and, ultimately, distributions to creditors.

If you do not complete the Voluntary Questionnaire, your proof of claim will still be valid so long as your Proof of Claim Form (Official Form 410) is properly completed and filed on time.

5. WHO ARE “SPECIALIZED CREDITORS” AND DO I NEED TO COMPLETE THE VOLUNTARY QUESTIONNAIRE?

1 “Specialized Creditors” include:

- 2 1) Anyone who thinks they invested in a property with KSMP—even if their name
3 isn’t on the title—and believes they may have a claim related to that investment;
4 2) Anyone who invested in Perris Freeway Plaza, LP, Specialty Properties Partners,
5 LP, and Treehouse Investments, LP (three entities managed by KSMP that are not
6 in bankruptcy but are believed to have once owned real estate); and
7 3) Anyone who thinks they have a claim because KSMP sold them an investment in a
8 property or entity.

9 As noted above, if you are a Specialized Creditor, you are asked (but not required) to
10 complete the Voluntary Questionnaire in addition to your Proof of Claim Form.

11 If you are not a Specialized Creditor, you only need to complete the Proof of Claim Form.

12 **6. WHERE CAN I GET A COPY OF THE PROOF OF CLAIM FORM AND**
13 **VOLUNTARY QUESTIONNAIRE?**

14 The forms are enclosed with this mailing. You can also get extra copies in the following
15 ways:

- 16 • Download for free from the Claims Agent’s website: <https://veritaglobal.net/LM>
17 • Request by email: KSMP@hoganlovells.com
18 • Call KSMP’s Claims Agent: (877) 709-4751 (U.S./Canada) or +1 (424) 236-7231
19 (International)
20 • Download from the Bankruptcy Court’s website (www.canb.uscourts.gov) – note: this
21 requires a PACER account and a small fee.

22 **57. HOW DO I SUBMIT MY PROOF OF ~~INTEREST~~ CLAIM FORM?**

23 ~~A properly completed and signed Proof of Interest Form and/or Proof of Claim Form, together~~
24 ~~with supporting documentation, must be submitted to the Claims Agent so they are actually received on~~
25 ~~or before the Bar Date, in one of the following ways:~~

26 You must complete and sign the enclosed Proof of Claim Form, attach any supporting
27 documents, and make sure the Claims Agent **actually receives** it by October 3, 2025. You can
28 submit your claim in one of two ways:

1. ~~Electronically uploaded~~ Online: Upload your form through Verita’s website at:
<https://veritaglobal.net/LM> <https://veritaglobal.net>

~~If Proof of Claim Form is sent by mail, Courier or Hand Delivery, send to:~~

2. By mail, courier or hand delivery:

KS Mattson Partners, LP Claims Processing Center

c/o KCC dba Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

Important notes:

- Do not send by fax or email—these will not be accepted.

~~Facsimile and e-mail delivery methods are not acceptable. If submitting by hard copy, you must submit an originally executed Proof of Interest or Proof of Claim. If you file an originally executed Proof of Interest and/or Proof of Claim and would like a copy of your Proof of Interest and/or Proof of Claim returned to you as proof of receipt, please enclose an additional copy and a self-addressed postage-paid envelope.~~

~~If you are mailing the Proof of Interest or Proof of Claim, **do not** include **original** copies of any documents attached to the Proof of Interest and/or Proof of Claim, as they may be destroyed after being scanned by the Claims Agent.~~

~~**PROOFS OF INTEREST AND PROOFS OF CLAIM SHOULD NOT BE FILED WITH THE COURT, OR SENT TO KSMP'S LEGAL COUNSEL, RETAINED PROFESSIONALS, OR OTHERWISE DELIVERED TO KSMP, AND ANY SUCH FORMS SO FILED OR SENT WILL NOT BE CONSIDERED PROPERLY SUBMITTED.**~~

- If you file a paper claim, you must submit an original signed copy.
- If you mail your proof of claim and want a stamped copy returned to you as proof of receipt, include a second copy (i.e., photocopy) of your submission plus a self-addressed, stamped envelope.
- If mailing, do not send original supporting documents—send copies only. The Claims Agent will scan and may destroy attachments.
- **Specialized Creditors:** Your claim may be treated as confidential if submitted through the Claims Agent. **If you file directly on the public court docket instead, it will not be confidential.**
- **DO NOT SEND IT TO KSMP, ITS LAWYERS, OR ITS PROFESSIONALS.**

6.8 REQUESTS FOR ADDITIONAL INFORMATION AND COOPERATION

~~If you have any questions regarding the claims process and/or you wish to obtain a copy of the Proof of Interest, Proof of Claim, or related documents, you may do so by: (i) visiting the Claims Agent's website at <https://veritaglobal.net/LM>, (ii) emailing KSMP@hoganlovells.com, or (iii) contacting KSMP's claims agent at (877) 709-4751 (U.S./Canada) or +1 (424) 236-7231 (International).~~

If after receiving a Proof of Claim, KSMP determines that additional information is needed to process your Claim, KSMP may contact you by telephone, mail, or email to request such additional information.

Exhibit C

Confidentiality Protocol Redline

~~Accordingly, the Movants request that the Court approve the following Investor Confidentiality Protocol:~~

1. Approval of Specialized Creditor Confidentiality Protocol. The “Specialized Creditor Confidentiality Protocol”, which shall apply to any Proofs of Claim filed by and/or Voluntary Questionnaire submitted by any person, trust, partnership, corporation or other entity (i) that asserts a Claim against Debtor KSMP arising out of an ownership interest in real property owned or formerly owned by Debtor KSMP, even if such person, trust, partnership, corporation or other entity is not listed on title; (ii) arising out of an investment in any other property or entity that was sold to them by Debtor KSMP; or (iii) that is a current or former investor in Perris Freeway Plaza, LP, Specialty Properties Partners, LP, and Treehouse Investments, LP—entities for which KSMP serves as the general partner (each, a “Specialized Creditor”), is approved. The Specialized Creditor Confidentiality Protocol is as follows:

a) ~~i) Investors~~ Specialized Creditors are directed not to file a ~~Proof of Interest Form or~~ Proof of Claim Form with the Court. Instead, all such forms must be sent to the Claims Agent ~~in accordance with the Proof of Interest Procedures.~~

b) ~~ii) Investor Proofs of Interest and~~ Specialized Creditor Proofs of Claim (including any attachments thereto) will not be available to the general public and will not be able to be accessed on the Claims Agent Website ~~(as defined below).~~ However, the following information (and only the following information) will be posted on the Claims Agent Website, whether such information is included on the Schedules and Statements or in a submitted Proof of ~~Interest Form or Proof of~~ Claim Form: (a) name of ~~Investor;~~ (b) ~~Debtor(s) against whom such Investor asserts an Interest(s) or a Claim(s);~~ (c) ~~percentage of Interests asserted by Investor to be held in each applicable Debtor;~~ and (d) ~~if applicable, nature, priority, and amount of any Claim(s) asserted by such Investor against each applicable Debtor;~~ the Creditor; and (b) amount of the asserted Claim.

c) ~~iii) The Investor~~ Specialized Creditor Confidentiality Protocol is for the benefit of the ~~Investors~~ Specialized Creditors. Accordingly, ~~Investors~~ Specialized Creditors may elect to make any information included in their own ~~Proof of Interest Form or~~ Proof of Claim Form public; *provided, however*, that any such disclosure shall not constitute a blanket waiver of confidentiality of all other information contained in or attached to such form and no other party may disclose any information from such form, except to Permitted Parties (as defined below).

d) ~~iv) Investor Proofs of Interest and~~ Specialized Creditor Proofs of Claim and the information contained thereon and attached thereto shall be held and treated

as confidential by ~~the Debtors, the Debtors'~~ Debtor KSMP, Debtor KSMP's counsel, and the Claims Agent and copies thereof may be provided to the parties listed below (the "Permitted Parties"). No party, including a Permitted Party, may obtain copies of ~~any Proof of Interest or~~ Proof of Claim unless such party executes a confidentiality agreement in a form ~~mutually agreeable with the Debtors and Committee.~~¹ to Debtor KSMP. Permitted Parties shall keep confidential and not disclose the contents of any ~~Investor Proof of Interest or~~ Specialized Creditor Proof of Claim except as otherwise provided herein or by order of the Court.

2. ~~v)~~ The "Permitted Parties" are as follows:

- a) ~~(1)~~ The Office of the United States Trustee (the "UST");
- b) Counsel and other professionals for Debtor KSMP retained pursuant to an order of the Court, including partners, counsel, associates, and employees of such professionals;
- c) ~~(2)~~ Counsel and other professionals for the LFM Debtors retained pursuant to an order of the Court, including partners, counsel, associates, and employees of such professionals;
- d) ~~(3)~~ Counsel and other professionals for the LFM Committee retained pursuant to an order of the Court, including partners, counsel, associates, and employees of such professionals;
- e) ~~(4)~~ Members of the LFM Committee;
- f) ~~(5)~~ Any mediator appointed pursuant to an order of the Court;
- g) ~~(6)~~ Any trustee, or functional equivalent thereof, appointed to administer payments to ~~Investors~~ Specialized Creditors, including pursuant to any plan;
- h) ~~(7)~~ Persons who are permitted access to one or more Proofs of Claim ~~or Proofs of Interest~~ upon stipulation of the ~~Investor~~ Specialized Creditor that submitted such form(s), after prior notice to counsel to ~~the Debtors and the Committee~~ Debtor KSMP and a reasonable opportunity to object; and
- i) ~~(8)~~ Such other persons as the Court allows after notice and an opportunity for hearing; *provided, however,* that any such determination shall be

¹- ~~The UST and Pachulski Stang Ziehl & Jones LLP, counsel for the Committee, shall not be required to execute the confidentiality agreement; provided, however, that such parties shall keep confidential and not disclose the contents of any Investor Proof of Interest or Proof of Claim except as otherwise provided herein or by order of the Court.~~

made on no less than fourteen days' prior notice to affected ~~Investors~~.Specialized Creditors; and

j) Socotra Capital, Inc., and its counsel and other professionals, also shall be designated a Permitted Party, subject to execution of a confidentiality agreement or protective order similar in form and substance to that stipulated protective order in place in the LFM Chapter 11 Cases.