

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

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

*Attorneys for the Debtors and
 Debtors in Possession*

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

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

 Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**CERTIFICATE OF NO OBJECTION
 REGARDING NOTICE OF SALE OF
 SUBJECT PROPERTY LOCATED AT
 7456 FOOTHILLS BOULEVARD,
 ROSEVILLE, CA 95747**

In re

 KS MATTSON PARTNERS, LP,

 Debtor.

[Re: Dkt. No. 1758]

Objection Deadline: August 8, 2025

¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/IM>

THE NOTICE OF SALE

On July 18, 2025, Keller Benvenutti Kim LLP, counsel for the debtors in the above-captioned chapter 11 cases (the “**Debtors**”),² filed the below-referenced notice of sale (the “**Notice of Sale**”) and adequate assurance declaration (the “**Conrad Declaration**”) pursuant to the *Order Establishing Procedures for Real Property Sales* [Dkt. No. 971] (the “**Sale Procedures Order**”) entered by the Court on March 5, 2025:

- *Notice of Sale of Subject Property Located 7456 Foothills Boulevard, Roseville, CA 95747* [Dkt. No. 1758]
- *Declaration of Ethan Conrad in Support of Adequate Assurance of Future Performance with Respect to the Assumption and Assignment of Executory Leases and/or Unexpired Contracts in Connection with the Sale of 7456 Foothills Boulevard, Roseville, CA 95747* [Dkt. No. 1759]

The Notice of Sale and the Conrad Declaration were served on July 18, 2025. The deadline to file responses or oppositions (the “**Objection Deadline**”) to the Notice of Sale was August 8, 2025, and no oppositions were filed with the Court or received by the Debtors. Prior to the Objection Deadline, the Debtors received one Qualified Bid for the Subject Property, as permitted by the Auction Procedures attached to the Notice of Sale as Exhibit 2. On August 13, 2025, the Debtors filed the *Notice of Auction of Subject Property 7456 Foothills Boulevard, Roseville, CA 95747* [Dkt. No. 2008]. On August 20, 2025, at 1:00 p.m., the Debtors held the Auction. On August 29, 2025, the Debtors filed the *Notice of Results of Auction of Subject Property 7456 Foothills Boulevard, Roseville, CA 95747* [Dkt. No. 2194], reporting that JZ Developments LLC, which subsequently assigned the purchase agreement to Wood Creek Plaza LLC, was selected as the Successful Bidder. Following the entry of an order by the Court, the Debtors are authorized to proceed with the closing of the sale of the Subject Property to Wood Creek Plaza LLC pursuant to the terms of the purchase agreement and assignment.

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

DECLARATION OF NO OBJECTIONS RECEIVED

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

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

2. I certify that I have reviewed the Court's docket in the Debtors' cases and the only
response to the Notice of Sale was the Qualified Bid from JZ Developments LLC.

Dated: August 29, 2025

KELLER BENVENUTTI KIM LLP

By: /s/ Gabrielle L. Albert

Gabrielle L. Albert

*Attorneys for the Debtors and Debtors in
Possession*