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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.<sup>1</sup>

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

In re  
KS MATTSON PARTNERS, LP,  
Debtor.

**STIPULATION TO CONTINUE HEARING  
ON AND EXTEND DEADLINE TO OBJECT  
ON MOTION (I) AUTHORIZING THE  
DEBTOR TO OBTAIN POST-PETITION  
SECURED FINANCING PURSUANT TO  
SECTION 364 OF THE BANKRUPTCY  
CODE; (II) AUTHORIZING THE USE OF  
THE DIP LENDER'S CASH COLLATERAL;  
(III) GRANTING SUPERPRIORITY**

<sup>1</sup> 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>.



**ADMINISTRATIVE EXPENSE CLAIMS; (IV) MODIFYING THE AUTOMATIC STAY; (V) SCHEDULING A FINAL HEARING; AND (VI) GRANTING RELATED RELIEF**

Date: September 12, 2025

Time: 11:00 a.m.

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

KS Mattson Partners, LP (the “Debtor”), the Official Committee of Unsecured Creditors (the “Committee”) and Serene Investment Management LLC (the “DIP Lender”) and together with the Debtor and the Committee, collectively, the “Parties”), by and through their undersigned counsel, submit this stipulation regarding the hearing scheduled on September 12, 2025 at 11:00 a.m. (Pacific Time) to consider the *Debtor’s Motion for Entry of Interim and Final Order (I) Authorizing the Debtor to Obtain Postpetition Secured Financing Pursuant to Section 364 of the Bankruptcy Code; (II) Authorizing the Use of The DIP Lender’s Cash Collateral; (III) Granting Superpriority Administrative Expense Claims; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief* [D.I. No. 1892] (the “Motion”)<sup>2</sup>, with objections currently due on September 5, 2025 at 4:00 p.m. (Pacific Time);

WHEREAS the Parties agree and stipulate that the hearing to consider the Motion should be continued to a later date and time;

WHEREAS the Parties agree and stipulate that the deadline for the Committee to object to the Motion should be continued a later date and time;

THEREFORE, the Parties stipulate that, upon entry of an order approving this stipulation by the Court, the hearing on the Motion shall be continued to **September 19, 2025 at 11:00 a.m.**

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

1 (Pacific Time) and that the Committee's deadline to object to the Motion shall be **September 12,**  
2 **2025 at 4:00 p.m.**(Pacific Time).

3 **IT IS SO STIPULATED.**  
4

5 August 29, 2025

HOGAN LOVELLS US LLP

7 By: /s/ Richard L. Wynne

Richard L. Wynne

8 *Attorneys for the Debtor and Debtor in Possession*

10 PACHULSKI STANG ZIEHL & JONES LLP

12 By: /s/ Jason Rosell

Jason Rosell

13 *Attorneys for the Debtor and Debtor in Possession*

15 LOEB & LOEB LLP

16 By: /s/ Lance Jurich

Lance Jurich

17 *Attorneys for Serene Investment Management LLC*

## **COURT SERVICE LIST**

ECF Parties

Mail service will be handled by counsel.