

Robert W. Norman, Jr. (SBN 232470)
 bnorman@houser-law.com
 HOUSER LLP
 9970 Research Drive
 Irvine, CA 92618
 Ph: (949) 679-1111
 Fax: (949) 679-1112

Attorney for U.S. Bank National Association, as Trustee for Greenpoint Mortgage Funding Trust
 Mortgage Pass-Through Certificates, Series 2006-AR7

**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

In re

KS MATTSON PARTNERS, LP,

Debtor.

**STIPULATION FOR WITHDRAWAL
 OF LIMITED OBJECTION AND
 AMENDMENT TO NOTICE OF SALE
 OF PROPERTY AT 7304-7306 ARLETA
 COURT, SACRAMENTO, CA 95823**

(SMALL ASSET SALE)

[NO HEARING REQUESTED]

This Stipulation for Withdrawal of Limited Objection and Amendment to Notice of Sale
 Transaction and Distribution of Proceeds from the Sale of Property (“Stipulation”) located at
 7304-7306 Arleta Court, Sacramento, CA 95823 (“Property”) is made by and between LeFever
 Mattson, a California corporation, and certain of its affiliates who are debtors and debtors in

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 6539 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 informati
 Debtors’ claims and noticing agent at <https://veritaglot>

possession (collectively, the “Debtors”²) in the above captioned chapter 11 cases (the “Chapter 11 Cases”), and Secured Creditor U.S. Bank National Association, as Trustee for Greenpoint Mortgage Funding Trust Mortgage Pass-Through Certificates, Series 2006-AR7 and PHH Mortgage Corporation as servicer (“U.S. Bank N.A. as Trustee”, and together with the Debtors, the “Parties”), by and through their counsel of record in the Chapter 11 Cases in reference to and consideration of the following:

RECITALS

A. On January 29, 2025, the Debtors filed a motion to approve omnibus procedures for the sale of their real property which the Court approved by entry of its *Order Establishing Omnibus Procedures for Real Property Sales* on March 5, 2025 (the “Sale Procedures Order”). See Dkt. No. 971.

B. Pursuant to the terms of the Sale Procedures Order, on August 1, 2025, the Debtors filed the *Notice of Sale of Subject Property Located at 7304-7306 Arleta Court, Sacramento, CA 95823* (the “Notice of Sale”) regarding the proposed sale of the Property at a price of \$450,000, with PHH Mortgage Corporation as the identified creditor. The deadline to file an objection to the Notice of Sale was August 22, 2025. See Dkt. No. 1919.

C. On August 22, 2025, U.S. Bank N.A. as Trustee filed a limited objection (the “Objection”) to the Notice of Sale seeking to clarify that U.S. Bank N.A. as Trustee is the creditor of record and to provide a current total payoff demand related to its secured claim against the Property. See Dkt. No. 2077.

D. As stated in the Objection, the deed of trust encumbering the Property was executed by Elaine Lockwood in favor of Mortgage Electronic Registration Systems, Inc. as nominee for Lender GreenPoint Mortgage Funding, Inc. in the amount of \$356,000.00 (“Deed of Trust”), recorded with the Sacramento County Clerk at Book 20060920 Page 0973 on September 20, 2006. **Objection, Exhibit A.**

E. As stated in the Objection, the Deed of Trust was assigned to U.S. Bank N.A. as

² Unless otherwise indicated, “Debtors” excludes KSMP.

Trustee, recorded with the Sacramento County Clerk as Document Number 202501020105 on January 2, 2025. **Objection, Exhibit B.**

F. As stated in the Objection, the amount owed on the loan is \$355,262.01, through September 19, 2025, with a per diem interest of \$66.50. **Objection, Exhibit C.**

G. As stated in the Objection, the lien on the Property is held by U.S. Bank N.A. as Trustee. PHH Mortgage Corporation is the servicer and attorney-in-fact for the Secured Lender.

H. The Parties have met and conferred regarding the Objection. U.S. Bank N.A. as Trustee, through counsel, has provided the Debtors with evidence of its secured interest in the Property, and the Parties seek to resolve the Objection.

I. Based on the terms of the Stipulation, the Debtors and U.S. Bank N.A. as Trustee, with the Official Committee of Unsecured Creditors (the "Committee") consent, agree as set forth below:

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THAT THE BANKRUPTCY COURT ORDER THAT:

1. Recitals. The Recitals are incorporated herein by this reference. The Parties agree that the matters set forth in the Recitals are true and correct to the best of their knowledge; however, the Recitals do not constitute evidentiary admissions or findings of fact.

2. Amendment to the Notice of Sale. The Parties agree the Notice of Sale as to the Property shall be deemed amended to reflect that U.S. Bank N.A. as Trustee is to be paid through escrow in accordance with its payoff demand through September 19, 2025 in the amount of \$355,262.01, with a per diem interest rate of \$66.50, a copy of which is attached to the Objection as Exhibit C and incorporated herein by this reference. Any order approving the sale of the Property shall be consistent with the terms and provisions herein.

3. Assignability. This Stipulation shall be binding upon and inure to the benefit of the parties hereto and their respective successors and assigns.

1 4. Binding on Trustee. The terms and conditions of this Stipulation thereon shall be
2 binding upon any trustee appointed herein or in any case to which these Chapter 11 Cases may
3 be converted.

4 5. Court Approval and Withdrawal of Objection. This Stipulation shall be submitted
5 forthwith to the Court for approval, and the Court shall retain jurisdiction to resolve any disputes
6 or controversies arising from this Stipulation or any order approving the terms of this Stipulation.
7 Upon the Court's order approving this Stipulation, the Objection of U.S. Bank N.A. as Trustee to
8 the Notice of Sale shall be deemed withdrawn, subject to the terms and provisions herein.

9 6. Reservation of Rights. Nothing contained in this Stipulation or any order
10 approving the terms of this Stipulation is intended to be or shall be construed as (i) an admission
11 as to the validity or invalidity of any claim against the Debtors or any collateral; (ii) an allowance
12 of U.S. Bank N.A. as Trustee's claim; (iii) a waiver of the Debtors', any creditor's, or any
13 appropriate party in interest's rights to assert or dispute the amount of, basis for, or validity of
14 any claim against the Debtors or any collateral; (iv) a waiver of any claims of the Debtors against
15 U.S. Bank N.A. as Trustee; (vi) a waiver of any claims or causes of action that may exist in favor
16 of or against any creditor or interest holder; or (vii) an approval, assumption, adoption, or rejection
17 of any agreement, contract, lease, program, or policy between the Debtors and any third party
18 under section 365 of the Bankruptcy Code.

19 7. This Stipulation and any order approving the terms of this Stipulation are effective
20 immediately. The fourteen (14) day stay period imposed by Rule 4001(a)(4) of the Federal Rules
21 of Bankruptcy Procedure is waived.

22 8. The Court shall retain jurisdiction to resolve any disputes or controversies arising
23 from this Stipulation or any order approving the terms of this Stipulation.

24 [SIGNATURES FOLLOWS ON NEXT PAGE]
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Dated: September 8, 2025

HOUSER LLP

/s/ Robert W. Norman, Jr.
Robert W. Norman, Jr.
Attorney for U.S. Bank National
Association, as Trustee for Greenpoint
Mortgage Funding Trust Mortgage Pass-
Through Certificates, Series 2006-AR7 and
PHH Mortgage Corporation

DATED: September 8, 2025

KELLER BENVENUTTI KIM LLP

/s/ Gabrielle L. Albert
Gabrielle L. Albert, Esq.
Attorneys for the Debtors and Debtors-in-
Possession

Consented to By:
PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Jason Rosell
Jason Rosell, Esq.
Attorneys for the Official Committee
of Unsecured Creditors

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On September 8, 2025 I served the following document(s) described as follows:

On the following interested parties in this action:

☒ **E-FILING**—By causing the document to be electronically filed via the Court’s CM/ECF system, which effects electronic service on counsel/parties who are registered with the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

Executed on September 8, 2025 at Irvine, California.

Courtney Hershey

SERVICE LIST

Gabrielle L. Albert
Matthew Tyler Davis
Tobias S. Keller
Dara Levinson Silveira
Thomas B. Rupp
KELLER BENVENUTTI KIM LLP
101 Montgomery Street, Suite 1950
San Francisco, CA 94104
galbert@kbklp.com
tdavis@kbklp.com
tkeller@kbklp.com
dsilveira@kbklp.com
trupp@kbklp.com

Attorneys for the Debtors and Debtors in Possession

Jared A. Day
Deanna K. Hazelton
Phillip John Shine
OFFICE OF THE U.S. TRUSTEE
450 Golden Gate Avenue, 5th Floor
Suite 05-0153
San Francisco, CA 954102
Email: phillip.shine@usdoj.gov
Email: deanna.k.hazelton@usdoj.gov
Email: jared.a.day@usdoj.gov
U.S. Trustee

Gillian Nicole Brown
Cia Mackle
PACHULSKI STANG ZIEHL & JONES
LLP
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
gbrown@pszjlaw.com
cmackle@pszjlaw.com
Attorneys for Creditor Committee

John D. Fiero
Debra I. Grassgreen
Jason Rosell
Brooke Elizabeth Wilson
PACHULSKI STANG ZIEHL & JONES
LLP
One Sansome Street
34th Floor, Suite 3430
San Francisco, CA 94104
jfiero@pszjlaw.com
dgrassgreen@pszjlaw.com
jrosell@pszjlaw.com
bwilson@pszjlaw.com
Attorneys for Creditor Committee

Steven W Golden
PACHULSKI STANG ZIEHL & JONES
LLP
919 N. Market Street, 17th Floor
Wilmington, DE 19801
sgolden@pszjlaw.com
Attorneys for Creditor Committee