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Case:

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

In re: LEFEVER MATTSON, a California corporation, et al., 1 Debtors. In re KS MATTSON PARTNERS, LP, Debtor.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

CERTIFICATE OF NO OBJECTION REGARDING AMENDED NOTICE OF SALE OF SUBJECT PROPERTY LOCATED AT 5537-5539 MISSIE WAY, **SACRAMENTO, CA 95823** 

[Re: Dkt. No. 2023]

Objection Deadline: September 5, 2025

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

## THE NOTICE OF SALE

On August 15, 2025, Keller Benvenutti Kim LLP, counsel for the debtors in the above-captioned chapter 11 cases (the "<u>Debtors</u>"), <sup>1</sup> filed the below-referenced amended notice of sale (the "<u>Amended Notice of Sale</u>") and previously, on August 4, 2025, filed an adequate assurance declaration (the "<u>Buyer's Declaration</u>"), pursuant to the *Order Establishing Procedures for Real Property Sales* [Dkt. No. 971] (the "<u>Sale Procedures Order</u>") entered by the Court on March 5, 2025:

- Amended Notice of Sale of Subject Property Located at 5537-5539 Missie Way,
  Sacramento, CA 95823 [Dkt. No. 2023]
- Declaration of Cornelius Tkachuk in Support of Adequate Assurance of Future Performance with Respect to the Assumption and Assignment of Executory Contracts and/or Unexpired Contracts in Connection with the Sale of 5537-5539 Missie Way, Sacramento, CA 95841 [Dkt. No. 1943]

The Amended Notice of Sale and the Buyer's Declaration were served on August 15, 2025, and August 4, 2025, respectively. The deadline to file responses or oppositions to the Amended Notice of Sale was September 5, 2025, and no oppositions or responses have been filed with the Court or received by the Debtors. Pursuant to the Sale Procedures Order, if the Objection Deadline passes without the filing of an Objection, the Debtors can file a Certificate of No Objection and upload the proposed order substantially in the form attached to the Amended Notice of Sale as <a href="Exhibit 1">Exhibit 1</a>. 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.

## **DECLARATION OF NO RESPONSE RECEIVED**

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

25 || / /

Case:

24-10545 Doc# 2236 Filed: 09/08/25 Entered: 09/08/25 15:20:54 Page 2 of

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

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

1	1. I am an attorney with the firm of Keller Benvenutti Kim LLP, counsel for the		
2	Debtors.		
3	2. I certify that I have reviewed the Court's docket in the Debtors' cases and have		
4	not received any response or opposition to the Amended Notice of Sale.		
5	Dated: September 8, 2025		KELLER BENVENUTTI KIM LLP
6			By: /s/ Gabrielle L. Albert
7			Gabrielle L. Albert
8			Attorneys for the Debtors and Debtors in Possession
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Case: 24-10545 Doc# 2236 Filed: 09/08/25 3 Entered: 09/08/25 15:20:54 Page 3 of