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*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.*,<sup>1</sup>

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**DEBTORS' STATEMENT OF NON-  
OPPOSITION TO MOTION FOR  
RELIEF FROM THE AUTOMATIC  
STAY**

In re

KS MATTSON PARTNERS, LP,

Debtor.

[Dkt. No. 1938]

**Date:** September 12, 2025

**Time:** 10:00 a.m.

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

<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>.

1 LeFever Mattson, a California corporation, and certain of its affiliates that are debtors and  
2 debtors in possession (the “Debtors”)<sup>2</sup> in the above-captioned chapter 11 cases, hereby submit this  
3 statement of non-opposition to the *Notice of Motion and Motion for Relief from the Automatic Stay*  
4 [Dkt. No. 1938] (the “Motion”)<sup>3</sup> filed by Mr. Mark Baker. Upon further investigation, the Debtors  
5 have determined that the automatic stay is not applicable to the State Court Litigation commenced  
6 by Mr. Baker and, therefore, no longer oppose the relief sought in the Motion. The State Court  
7 Litigation should be allowed to proceed in the Solano County Superior Court.

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9 Dated: September 8, 2025

**KELLER BENVENUTTI KIM LLP**

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11 By: /s/ Matthew Tyler Davis

12 Matthew Tyler Davis

13 *Attorneys for the Debtors and Debtors in*  
14 *Possession*

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27 <sup>2</sup> Unless otherwise indicated, “Debtors” as used herein excludes KSMP.

28 <sup>3</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.