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 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

**CORRECTED NOTICE OF HEARING ON  
 MOTION OF DEBTORS FOR SALE OF  
 CERTAIN REAL PROPERTY SERVING AS  
 COLLATERAL FOR SOCOTRA CAPITAL,  
 INC. FREE AND CLEAR OF LIENS,  
 CLAIMS AND ENCUMBRANCES AND  
 RELATED RELIEF**

In re

KS MATTSON PARTNERS, LP,

Debtor.

**LIEN HOLDER: SOCOTRA CAPITAL, INC.**

**Date:** October 3, 2025

**Time:** 11:00 a.m.

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

**Objection Deadline:<sup>2</sup> September 19, 2025**

<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>.

<sup>2</sup> The Objection Deadline for Socotra Capital, Inc. ("Socotra") shall be September 19, 2025.



TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, AND OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE THAT on August 6, 2024, Windscape Apartments, LLC filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE THAT on September 12, 2024, LeFever Mattson, a California corporation (“LeFever Mattson”), and 57 affiliated entities (the “September 12 Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE THAT on October 2, 2024, Pinewood Condominiums, LP and Ponderosa Pines, LP, both affiliates of LeFever Mattson, filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “October 2 Debtors,” and collectively with Windscape Apartments, LLC and the September 12 Debtors, the “Debtors”).<sup>3</sup> The bankruptcy cases of the Debtors and KSMP are being jointly administered for procedural purposes only (the “Chapter 11 Cases”).

PLEASE TAKE FURTHER NOTICE THAT pursuant to the *Motion of Debtors for Sale of Certain Real Property Serving as Collateral for Socotra Capital, Inc. Free and Clear of Liens, Claims and Encumbrances and Related Relief* (the “Motion”)<sup>4</sup> filed on September 5, 2025, Debtors Windscape Apartments, LLC (“Windscape”), Golden Tree, LP (“Golden Tree”), Firetree I, LP (“Firetree I”), and Firetree III, LP (“Firetree III,” and, together with Windscape, Golden Tree, and Firetree I, the “Sellers”) move for entry of an order (i) approving the sale, free and clear of liens, claims, and encumbrances, of certain Properties pursuant to sale agreements between the respective Seller and Purchaser (the “Agreements”) and related documents and amendments attached as Exhibits A through G to the *Declaration of Bradley D. Sharp in Support of Motion of Debtors for Sale of Certain Real Property Serving as Collateral for Socotra Capital, Inc. Free and Clear of Liens, Claims and Encumbrances and Related Relief* (the “Sharp Declaration”) filed contemporaneously herewith; (ii) approving each of the Agreements; (iii) approving the escrow of the net sale proceeds after the payment of Closing Costs in the Escrow Accounts; (iv) approving the Sellers’ assumption and assignment of the Leases as set forth therein; (v) prohibiting Socotra from credit bidding for the Properties; (vi) waiving the stay of the effectiveness of any order granting the Motion; and (vii) providing such other and further relief as is just and appropriate under the circumstances.

PLEASE TAKE FURTHER NOTICE THAT the Properties to be sold are listed in Exhibit A<sup>5</sup> hereto with a summary of the terms of each Agreement.

PLEASE TAKE FURTHER NOTICE THAT the sale pursuant to the Motion shall be free and clear of liens and encumbrances to the extent provided under the Bankruptcy Code, with any such liens or encumbrances of any kind or nature to attach to the net proceeds of the sale in the order of their priority, with the same validity, force and effect which they had immediately prior to sale as against the Property.

<sup>3</sup> Unless stated otherwise, “Debtors” as used herein excludes KSMP.

<sup>4</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

<sup>5</sup> This notice corrects the purchase price listed for the property located at 900 East Napa Street, Sonoma, California in Exhibit A to \$1.7 million. The previously filed notice [Dkt. No. 2216] incorrectly listed the purchase price as \$1.5 million.

1 **PLEASE TAKE FURTHER NOTICE THAT** the certain unexpired leases or executory  
2 contracts (the “Leases”) associated with certain of the Properties will be assumed and assigned to  
3 the Purchasers, as applicable, pursuant to the Motion.

4 **PLEASE TAKE FURTHER NOTICE THAT** to the extent that any counterparty to a  
5 Lease fails to timely object to the Motion or the assumption and assignment of its Lease to a  
6 Purchaser, such counterparty is deemed to have consented to the assignment of its Lease to such  
7 Purchaser.

8 **PLEASE TAKE FURTHER NOTICE THAT** the hearing on the Motion has been set  
9 for **October 3, 2025, at 11:00 a.m. (Pacific Time)**, before the Honorable Charles Novack, United  
10 States Bankruptcy Judge.

11 **PLEASE TAKE FURTHER NOTICE THAT** pursuant to Bankruptcy Local Rule 9014-  
12 1(c)(1), any objection, with the exception of any objection by Socotra, to the requested relief must  
13 be filed and served upon counsel for the Debtors at the above-captioned address so as to be  
14 received **on or before September 19, 2025**, and must be accompanied by any declarations or  
15 memoranda of law any requesting party wishes to present in support of its position.

16 **PLEASE TAKE FURTHER NOTICE THAT** by agreement among the Debtors, the  
17 Committee, KSMP, and Socotra, any objection by Socotra to the Motion must be filed and served  
18 upon counsel for the Debtors at the above-captioned address by September 29, 2025, and must be  
19 accompanied by any declarations or memoranda of law any requesting party wishes to present in  
20 support of its position.

21 **PLEASE TAKE FURTHER NOTICE THAT** counsel and other interested parties may  
22 attend in person in Courtroom 215 of the United States Bankruptcy Court, 1300 Clay Street in  
23 Oakland, California, by Zoom video, or by Zoom telephone. Additional information is available  
24 on Judge Novack’s Procedures page on the Bankruptcy Court’s website, and information on how  
25 to attend the hearing by Zoom will be included with each calendar posted under Judge Novack’s  
26 Calendar on the Bankruptcy Court’s website. If you have questions about how to participate in a  
27 video or telephonic hearing, you may contact the court by calling 888-821-7606 or by using the  
28 Live Chat feature on the Bankruptcy Court’s website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov).

**PLEASE TAKE FURTHER NOTICE** that a copy of the Motion and its supporting  
documents can be viewed and/or obtained by: (i) accessing the Bankruptcy Court’s website at  
<http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450 Golden  
Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ claims and noticing agent, KCC  
dba Verita Global, at the following web address: <https://www.veritaglobal.net/LM>, or by calling  
(877) 709-4751 (toll free) for U.S. and Canada-based parties; or (424) 236-7231 for International  
parties or by e-mail at: [www.veritaglobal.net/lm/inquiry](mailto:www.veritaglobal.net/lm/inquiry). Note that a PACER password is needed  
to access documents on the Bankruptcy Court’s website.

Dated: September 9, 2025

**KELLER BENVENUTTI KIM LLP**

By: /s/ Matthew Tyler Davis

Matthew Tyler Davis

*Attorneys for the Debtors and Debtors in  
Possession*

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**EXHIBIT A**

Property	<b>17700 Sonoma Highway, Sonoma, California</b>
Sellers	Firetree III, LP
Buyer	Sean S. Payne, Trustee of the Sean S. Payne Trust Dated October 31, 2024
Purchase Price	\$1.215 million
Deposit	\$30,000
Commissions	3.75%

Property	<b>900 East Napa Street, Sonoma, California</b>
Seller	Windscape Apartments, LLC
Buyers	Mitchell B. Fong and Denise M. Walsh
Purchase Price	\$1.7 million, all-cash
Deposit	\$51,000
Commissions	5%

Property	<b>19340 7th Street East, Sonoma, California</b>
Seller	Golden Tree, LP
Buyer	Kyle Nagel
Purchase Price	\$2.625 million
Deposit	\$81,000
Commissions	5%

Property	<b>424 2nd Street West, Sonoma, California</b>
Seller	Windscape Apartments, LLC
Buyer	Kevin Keiser and Julia Keiser
Purchase Price	\$1.2 million
Deposit	\$36,000
Commissions	5%

Property	<b>24321 Arnold Drive, Sonoma, California</b>
Seller	Firetree I, LP
Buyer	I Heart Sonoma, LLC
Purchase Price	\$1.45 million
Deposit	\$43,500
Commissions	4.5%

Property	<b>1025 Napa Road, Sonoma, California</b>
Seller	Windscape Apartments, LLC
Buyer	I Heart Sonoma, LLC
Purchase Price	\$950,000
Deposit	\$30,000
Commissions	4.5%

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