

Richard L. Wynne (Bar No. 120349)
richard.wynne@hoganlovells.com
Erin N. Brady (Bar No. 215038)
erin.brady@hoganlovells.com
Edward J. McNeilly (Bar No. 314588)
edward.mcneilly@hoganlovells.com
HOGAN LOVELLS US LLP
1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Telephone: (310) 785-4600
Facsimile: (310) 785-4601

Todd M. Schwartz (Bar No. 288895)
todd.schwartz@hoganlovells.com
HOGAN LOVELLS US LLP
855 Main St Suite 200
Redwood City, CA 94063
Telephone: (650) 463-4000
Facsimile: (650) 463-4199

Attorneys for Debtor and Debtor in Possession

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

In re
LEFEVER MATTSON, a California
corporation, et al.
Debtors.¹

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

In re
KS MATTSON PARTNERS, LP,
Debtor.

**STIPULATION TO REVISE BRIEFING
SCHEDULE ON MOTION FOR RELIEF
FROM STAY RE: FIRST STREET AND
NATOMOA PROPERTIES**

Date: September 19, 2025
Time: 10:00 a.m.
Place: 1300 Clay Street, Room 215
In Person or Tele/Video Conf.
Judge: Hon. Charles Novack

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 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621. 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>.

Debtor KS Mattson Partners, LP ("KSMP") by and through its undersigned counsel and the Estate of BRAD DRIVER, by and through the Personal Representative and Administrator of his estate, MARIAH DRIVER ("Driver"), by and through its undersigned counsel (collectively, the "Parties"), hereby stipulate to the following:

1. On December 30, 2024, Driver filed a Motion for Relief from Stay Re: Natoma Street Properties and a Motion for Relief from Stay Re: First Street Properties (collectively, the "Motions"). Case No. 24-10715, Dkt. Nos. 21, 23.

2. The Motions are presently set for hearing on September 19, 2025.

3. The Parties are continuing to work together in good faith to devise a mutually suitable proposal for the disposition of the First Street Properties and the Natoma Street Properties.

4. Accordingly, the Parties agree that the hearing be continued to Friday, November 14, 2025 or the first date thereafter the Court is available to hear the Motions.

5. Any response by KSMP shall be filed no later than three days before the continued hearing on the Motions.

6. The automatic stay shall remain in effect pending further order of this Court.

7. A proposed order requesting approval of this stipulated agreement shall be promptly uploaded concurrent with the filing of this stipulation.

[Signature Pages Follow]

Dated: September 11, 2025

Dated: September 11, 2025

HOGAN LOVELLS US LLP

GOMEZ LAW GROUP

By: /s/ Edward J. McNeilly

By: /s/ Alvin M. Gomez

Richard L. Wynne

Alvin M. Gomez, Esq.

Erin N. Brady

David Finn, Esq.

Edward J. McNeilly

Boris Smylsov, Esq.

Todd M. Schwartz

Attorneys for the Debtor and Debtor in Possession

Attorneys for the Estate of Brad Driver, by and through the Personal Representative and Administrator of his estate, Mariah Driver