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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.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**CERTIFICATE OF NO OBJECTION
 REGARDING NOTICE OF SALE OF
 SUBJECT PROPERTY LOCATED AT
 3217 WALNUT AVENUE,
 CARMICHAEL, CA 95608**

In re

 KS MATTSON PARTNERS, LP,

 Debtor.

[Re: Dkt. No. 2046]

Objection Deadline: September 9, 2025

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 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/IM>

THE NOTICE OF SALE

On August 19, 2025, Keller Benvenuti Kim LLP, counsel for the debtors in the above-captioned chapter 11 cases (the “**Debtors**”),¹ filed the below-referenced notice of sale (the “**Notice of Sale**”)² and adequate assurance declaration (the “**Buyer’s Declaration**”) pursuant to the *Order Establishing Procedures for Real Property Sales* [Dkt. No. 971] (the “**Sale Procedures Order**”) entered by the Court on March 5, 2025:

- *Notice of Sale of Subject Property Located at 3217 Walnut Avenue, Carmichael, CA 95608* [Dkt. No. 2046]
- *Declaration of Roop Purewal in Support of Adequate Assurance of Future Performance on by Pumco, Inc., a California Corporation, with Respect to the Assumption and Assignment of Executory Contracts and/or Unexpired Contracts in Connection with the Sale of 3217 Walnut Avenue, Carmichael, CA 95608* [Dkt. No. 2047]

The Notice of Sale and the Buyer’s Declaration were served on August 19, 2025. The deadline to file responses or oppositions to the Notice of Sale was September 9, 2025. An informal objection to the Notice of Sale was raised by Web Service Company, Inc. (“**WASH**”). On September 15, 2025, the Debtors and WASH entered into the *Stipulation for the Amendment to Notice of Sale of Property at 3217 Walnut Avenue, Carmichael, CA 95608* [Dkt. No. 2344] which the court approved [Dkt. No. 2356] (the “**Stipulation and Order**”). No other opposition 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 Notice of Sale as Exhibit 1. 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.

¹ Unless otherwise indicated, “Debtors” as used herein excludes KSMP.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Notice of Sale.

DECLARATION OF NO RESPONSE RECEIVED

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

1. I am an attorney with the firm of Keller Benvenutti Kim LLP, counsel for the
Debtors.

2. I certify that I have reviewed the Court's docket in the Debtors' cases and the
only objection received to the Notice of Sale was that of WASH which has been resolved by the
Stipulation and Order.

Dated: September 17, 2025

KELLER BENVENUTTI KIM LLP

By: /s/ Gabrielle L. Albert

Gabrielle L. Albert

*Attorneys for the Debtors and Debtors in
Possession*