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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

**[CORRECTED] STIPULATION TO
WITHDRAW THE MOTION FOR
RELIEF FROM THE AUTOMATIC
STAY**

In re:

KS MATTSON PARTNERS, LP,

Debtor.

[Re Dkt. Nos. 1938]

Date: September 26, 2025

Time: 10:00 a.m.

Place: In Person or Via Zoom

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

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://veritaglot>

1 This stipulation (the “Stipulation”) is made by and between RT Golden Hills, LP (“RT
2 Golden Hills”) in the above captioned chapter 11 cases (the “Chapter 11 Cases”); and Mark Baker
3 (“Mark Baker,” and together with the Debtors, the “Parties”), in reference to and in consideration
4 of the following:

5 **RECITALS**

6 On August 4, 2025, Mark Baker filed *Notice of Motion and Motion for Relief from the*
7 *Automatic Stay* [Dkt. No. 1938] (the “Motion”).

8 A. The Motion is currently set for hearing on September 26, 2025, at 10:00 a.m.
9 (Pacific Time) (the “Hearing”).

10 B. On or about September 23, 2025, the Parties entered into a Settlement Agreement
11 which resolved the dispute between the Parties. With the execution of the Settlement Agreement,
12 the Motion is moot.

13 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
14 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
15 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
16 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THAT THE BANKRUPTCY**
17 **COURT ORDER THAT:**

- 18 1. The Motion shall be withdrawn and the Hearing on the Motion shall be cancelled.
19 2. All arguments, rights, and claims of the Parties are expressly preserved.
20 3. This Stipulation shall constitute the entire agreement and understanding of the
21 Parties relating to the subject matter hereof and supersede all prior agreements and understandings
22 relating to the subject matter hereof.

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1 4. The Court shall retain jurisdiction to resolve any disputes or controversies arising
2 from this Stipulation or any Order approving the terms of this Stipulation.

3 Dated: September 23, 2025

KELLER BENVENUTTI KIM LLP

4 By: /s/ Gabrielle L. Albert

5 Gabrielle L. Albert

6 *Attorneys for RT Golden Hills, LP*

7 **MARK BAKER**

8 By: /s/ *Mark Baker*
Mark Baker (Sep 23, 2025 19:48:05 PDT)

9 Mark Baker


P852A (Stipulation to Withdraw Mark Baker's RFS Motion)

Final Audit Report

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