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Attorneys for
 Ally Bank Lease Trust - Assignor to Vehicle Asset Universal Leasing Trust (a.k.a. "VAULT TRUST", or "V.A.U.L. Trust", or "VAULT", or "V.A.U.L.T.")

UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SANTA ROSA DIVISION

In re:) Case No. 24-10545 CN
)
 Lefever Mattson, A California Corporation, *et*) Chapter 11
al.,)
 Debtor.) RS No. JCW-11600
)
)
) **NOTICE OF MOTION FOR RELIEF**
) **FROM AUTOMATIC STAY**
)
) Date: 10/24/2025
) Time: 10:00AM
) Ctrm: 215
) Place: 1300 Clay Street
) Oakland, CA 94612
)
) Judge: Charles Novack
)
)

¹ The last four digits of LeFever Mattson's tax identification number are 7537. 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>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.



1 TO: Debtor, LeFever Mattson, A California Corporation; Debtor's Attorneys of Record,
2 Gabrielle L. Albert, M. Tyler Davis, Tobias S. Keller, Dara Levinson Silveira, Thomas B. Rupp;
3 United States Trustee and their Attorneys of record; Creditor Committee and their Attorneys of
4 record; and Other Interested Parties.

5 NOTICE IS HEREBY GIVEN that on the above date and time in the Court located at
6 1300 Clay Street, Courtroom 220, Oakland, CA 94612, Ally Bank Lease Trust - Assignor to
7 Vehicle Asset Universal Leasing Trust (a.k.a. "VAULT TRUST", or "V.A.U.L. Trust", or
8 "VAULT", or "V.A.U.L.T.") ("Ally Bank" herein) will move this Court for an Order granting
9 relief from the automatic stay on the grounds set forth in the attached Motion for Relief from the
10 Automatic Stay.

11 Please take notice Respondents will not be required to, but may, file responsive
12 pleadings, points and authorities, and declarations for any preliminary hearing. Please further
13 take notice that unless Respondent appears at the hearing in opposition to the Motion, the
14 Motion may be granted without further hearing.

15 Counsel, parties, and other interested parties may attend the hearing in person in
16 Courtroom 215 in Oakland, by Zoom video or by Zoom telephone. Additional information is
17 available on Judge Novack's Procedures page on the court's website, and information on how to
18 attend the hearing by Zoom will be included with each calendar posted under Judge Novack's
19 Calendar on the court's website.

20 DATED: October 1, 2025

McCARTHY & HOLTHUS, LLP

21
22 By: /s/ Jennifer C. Wong
23 Jennifer C. Wong, Esq.
24 Attorney for, Ally Bank Lease Trust -
25 Assignor to Vehicle Asset Universal
26 Leasing Trust (a.k.a. "VAULT TRUST",
27 or "V.A.U.L. Trust", or "VAULT", or
28 "V.A.U.L.T.")

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Attorneys for
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NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re:) Case No. 24-10545 CN
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Lefever Mattson, A California Corporation, *et*) Chapter 11
al.,)
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CERTIFICATE OF SERVICE

On 10/1/2025, I served the foregoing **NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY, MOTION FOR RELIEF FROM AUTOMATIC STAY, MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR RELIEF FROM AUTOMATIC STAY, DECLARATION IN SUPPORT OF MOTION FOR RELIEF FROM AUTOMATIC STAY, EXHIBITS TO MOTION AND RELIEF FROM STAY COVER SHEET** on the following individuals by depositing true copies thereof in the United States mail at San Diego, California, enclosed in a sealed envelope, with postage paid, addressed as follows:

DEBTOR

Lefever Mattson, A California Corporation, 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621

DEBTORS' COUNSEL

Thomas B. Rupp, Keller Benvenuti Kim LLP, 101 Montgomery St. Suite 1950, San Francisco, CA 94104

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Gabrielle L. Alpert, Keller Benvenuti Kim LLP, 101 Montgomery St. Suite 1950, San Francisco, CA 94104

M. Tyler Davis, Keller Benvenuti Kim LLP, 101 Montgomery St. Suite 1950, San Francisco, CA 94104

Dara Levinson Silveria, Keller Benvenuti Kim LLP, 101 Montgomery St. Suite 1950, San Francisco, CA 94104

ATTORNEY FOR US TRUSTEE

Jared A. Day, Office of the U.S. Trustee, 300 Booth St. #3009, Reno, NV 89509

Deanna K. Hazelton, DOJ-Ust, 2500 Tulare Street, Ste 1401, Fresno, CA 93721

Phillip John Shine, DOJ-Ust, 450 Golden Gate Avenue, 5th Floor, Suite #05-0153, San Francisco, CA 954102

RESPONSIBLE INDIVIDUAL

Bradley D. Sharp, President & CEO, DSI Consulting, 333 South Grand Avenue, Ste 4100 Los Angeles, CA 90071

ATTORNEYS FOR CREDITOR COMMITTEE

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2 Floor, Suite 3430, San Francisco, CA 94104-4436

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10 Ste 13th Floor, Los Angeles, CA 90067

11 Cia Mackle, Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd. Ste 13th
12 Floor, Los Angeles, CA 90067

13 20 LARGEST UNSECURED CREDITORS

14 Auerbach Engineering Corporation, PO Box 5399, Tahoe City, CA 96145

15 Brandon Granillo, 830 Illinois Street #2, 830-2, Fairfield, CA 94533

16 Charlene Hultman, Plaintiff, 423 Washington Street, Suite 600, San Francisco, CA 94111

17 David Currier, Nina Currier, 1173 Araquipa Court, 1173, Vacaville, CA 95687

18 Jose Ortega Pena, 3310-3336 Cimmarron, 3320-02, Cameron Park, CA 95682

19 LeTofia Paopao, 157 James River Road, 157, Vallejo, CA 94591

20 Lyly Tu, Bien Nguyen, 5601 Walnut Avenue #4, 4, Orangevale, CA 95662

21 Mauricio Rodriguez Perez, Jose Rodriguez Martinez, 3310-3336 Cimmarron, 3336-02,
22 Shingle Springs, CA 95682

23 McGowan Trustee of the Lorraine Margaret Orlich Trust Dated 9/26/03, 10 Royale
24 Avenue, Unit #22, Lakeport, CA 95453

25 Monley Hamlin Construction, 4600 Fermi Pl, Davis, CA 95618

26 Pacific Gas & Electric, P.O. Box 997300, Sacramento, CA 95899-7300

27 Pear Tree Homeowner's Association, C/O First Bank Association Service, P.O. Box
28 15039, Vallejo, CA 94591-1939

1 Perfection & Elegant Home Management, Po Box 8391, Truckee, CA 96162

2 Plaintiffs In Claridge Et Al. Litigation, San Francisco Airport Office Center, 840
3 Malcolm Road, Suite 200, Burlingame, CA 94010

4 Plaintiffs In Tubley Et Al. Litigation, 1500 First Street, Suite 200, Napa, CA 94559

5 BPE Law Group, P.C., Attn: Laura E. Ferret, Esq., 2339 Gold Meadow Way, Rancho
6 Cordova, CA 95670

7 Sherman Family Living Trust Dtd 3/13/00, 8501 Bishop Creek Circle, Roseville, CA
8 95661

9 Tamara D. Migliozi, Plaintiff, C/O Cory B. Chartrand, Esq Fores Macko Johnston &
10 Chartrand, 1600 "G" Street, Suite 103, Modesto, CA 95354

11 Tony Villarreal, Patty Kramer, 1864 Quail Meadows Circle, 1864, Vacaville, CA 95687

12 Truckee Donner Public Utility District, 11570 Donner Pass Rd, Truckee, CA 96161-4992

13 **I declare under penalty of perjury under the laws of the United States of America**
14 **that the foregoing is true and correct.**

15 Dated: 10/1/2025

16 /s/ Hue Banh
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