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*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.<sup>1</sup>

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

In re  
 KS MATTSON PARTNERS, LP,  
 Debtor.

**DEBTOR KSMP'S APPLICATION FOR AN  
 ORDER (I) AUTHORIZING THE  
 RETENTION AND PAYMENT, AS OF  
 AUGUST 22, 2025, OF PROFESSIONALS  
 UTILIZED BY DEBTOR KSMP IN THE  
 ORDINARY COURSE OF BUSINESS AND  
 (II) GRANTING RELATED RELIEF**

**Date:** December 3, 2025  
**Time:** 11:00 a.m. (Pacific Time)  
**Place:** United States Bankruptcy Court  
 1300 Clay Street, Courtroom 215  
 Oakland, CA 94612  
**Objection Deadline:** November 26, 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 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 <http://usitc-global.net/USM>

1 KS Mattson Partners, LP (“Debtor KSMP”), debtor and debtor-in-possession in the above-  
2 captioned chapter 11 case (the “KSMP Chapter 11 Case”), hereby files this motion (the “Motion”),  
3 pursuant to sections 105(a), 327, 328 and 330 of title 11 of the United States Code (the “Bankruptcy  
4 Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule  
5 9013-1(a) of Bankruptcy Local Rules for the Northern District of California (the “Local Rules”), for  
6 the entry of an order: (i) authorizing the retention and payment, effective as of August 22, 2025, of  
7 certain professionals employed by Debtor KSMP in the ordinary course of business without the  
8 submission of separate retention applications and the issuance of separate retention orders for each  
9 individual professional and (ii) granting related relief.

10 Debtor KSMP’s proposed form of order granting the relief requested herein is attached as  
11 **Exhibit 1** (the “Proposed Order”).

## 12 **MEMORANDUM OF POINTS AND AUTHORITIES**

### 13 **I. INTRODUCTION**

14 By this Motion, Debtor KSMP seeks approval of procedures for the compensation and  
15 reimbursement of professionals who are retained by Debtor KSMP in the ordinary course of  
16 business to provide services that are not central to administration of the KSMP Chapter 11 Case. A  
17 real estate business such as Debtor KSMP typically retains several professionals that routinely  
18 provide crucial services, including ordinary course legal services relating to real estate and tenant  
19 disputes. While these services are not directly related to the KSMP Chapter 11 Case, they are  
20 essential to Debtor KSMP’s ability to maintain its operations and effectively manage its estate. The  
21 relief sought herein will allow Debtor KSMP to employ these professionals to provide services  
22 similar to those that were required before the KSMP Chapter 11 Case, without unnecessary  
23 administrative burden and cost.

### 24 **II. JURISDICTION AND VENUE**

25 This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This  
26 is a core proceeding pursuant to 28 U.S.C. § 157(b), the Order Referring Bankruptcy Cases and  
27 Proceedings to Bankruptcy Judges, General Order No. 24 (N.D. Cal.), and Rule 5011-1(a) of the Local  
28 Rules. Venue for this matter is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

### **III. BACKGROUND**

#### **A. General Background**

Debtor KSMP's chapter 11 case arises out of an alleged multiyear and multimillion fraud perpetrated by Kenneth Mattson. This alleged fraud has resulted in multiple litigations against Debtor KSMP, Kenneth Mattson and LeFever Mattson, a California corporation jointly owned by Mr. Mattson and Tim LeFever, and has also resulted in the United States Department of Justice bringing criminal charges against Mr. Mattson.

#### **B. Formation and Ownership of Debtor KSMP**

Debtor KSMP was formed as a California limited partnership on August 16, 1999, to manage and develop assets held by Kenneth Mattson and his family. Debtor KSMP's partnership agreement provides that its partnership interests are held by each of Mr. Mattson (49%), his wife, Stacy Mattson, (49%), and K S Mattson Company, LLC (2%). Because Debtor KSMP failed to maintain adequate books and records before the Relief Date, the Responsible Individual is currently undertaking efforts to determine what assets Debtor KSMP owns. At present, the Responsible Individual believes that Debtor KSMP may hold interests in approximately 36 properties, some owned outright and others held as tenant-in-common with other investors, although this number remains subject to change as further diligence and investigation are completed.

#### **C. Commencement of the KSMP Chapter 11 Case**

On November 22, 2024, Debtor KSMP became subject to an involuntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2024 (the "Relief Date"), the Court entered the *Stipulated Order for Relief in an Involuntary Case* (Docket No. 131) and appointed Robbin L. Itkin as the Responsible Individual in this case, with effect from June 16, 2025 (the "Itkin Approval Order") (Docket No. 172). Among other things, the Itkin Approval Order authorizes Ms. Itkin, on behalf of the estate and at its expense, to retain professionals and other individuals deemed necessary or advisable to assist her in carrying out her duties. *See* Itkin Approval Order ¶ 4 Debtor KSMP continues to operate its business and manage its properties as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed.

1                   **D. Related Cases and Joint Administration**

2                   On September 19, 2024, LeFever Mattson and fifty-seven affiliates and subsidiaries  
3 (collectively, the “LFM Debtors”)—parties related to Debtor KSMP—filed voluntary petitions for  
4 relief under chapter 11 of the Bankruptcy Code, commencing their jointly administered bankruptcy  
5 cases (the “LFM Chapter 11 Cases”). On July 29, 2025, the Court entered the *Stipulated Bridge*  
6 *Order in Connection with the Motion to Substantively Consolidate the Bankruptcy Estates of*  
7 *LeFever Mattson and KS Mattson Partners, LP* [Docket No. 1887], which, among other things,  
8 jointly administers the KSMP Chapter 11 Case with the LFM Chapter 11 Cases (collectively, the  
9 “Chapter 11 Cases”).<sup>2</sup>

10                  An unsecured creditors’ committee was appointed in the LFM Chapter 11 Cases (the  
11 “Committee”) and, on August 26, 2025, this same Committee was appointed in the KSMP Chapter  
12 11 Case [Docket No. 2104].

13                   **E. Proposed Procedures Professional Retention Procedures**

14                  A real estate entity like Debtor KSMP routinely relies upon professionals retained in the  
15 ordinary course of business (each, an “Ordinary Course Professional” and, collectively, the  
16 “Ordinary Course Professionals”) to assist with its day-to-day operations. Because Debtor KSMP  
17 has no employees and, thus, no in-house real estate counsel, it is necessary to engage outside  
18 professionals to handle routine landlord-tenant issues, such as non-payment of rent, holdovers and  
19 squatters.

20                  The Responsible Individual has not identified any Ordinary Course Professionals  
21 previously retained by Debtor KSMP and therefore expects to retain new firms for these critical  
22 services. At present, Debtor KSMP seeks to employ those Ordinary Course Professionals identified  
23 on **Exhibit 1** to the Proposed Order (the “Initial OCP List”), which currently includes two counsel  
24 specializing in landlord-tenant disputes. Debtor KSMP reserves the right to supplement the Initial  
25

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26                  <sup>2</sup> One other entity, Windscape Apartments, LLC, filed a voluntary petition for chapter 11 (Case No. 24-  
27 10417) on August 6, 2024, and two other entities, Pinewood Condominiums, LP (Case No. 24-10598) and  
28 Ponderosa Pines, LP (Case No. 24-10599), filed voluntary chapter 11 petitions on October 2, 2024. These  
entities are the LeFever Mattson Debtors.

1 OCP List as the need for additional types of Ordinary Course Professionals arises.

2 The legal services that will be performed by those professionals presently listed on the  
3 Initial OCP List are not within the scope of Hogan Lovells, LLP ("Hogan Lovells"), Debtor  
4 KSMP's counsel. While Hogan Lovells has a substantial real estate practice, it does not specialize  
5 in the type of landlord-tenant disputes commonly faced by Debtor KSMP and would be  
6 substantially more expensive on these routine matters. Consequently, retaining specialized  
7 landlord-tenant counsel is therefore both more cost-effective and more efficient, ensuring that  
8 recurring issues are handled promptly without incurring unnecessary expense to the estate.

9 Debtor KSMP proposes the following procedures with respect to the Ordinary Course  
10 Professionals (the "OCP Procedures"):

- 11 a) **Ordinary Course Professional Fee Caps:** During the pendency of this case: (i)  
12 no Ordinary Course Professional listed on the Initial OCP List will be paid more  
13 than *\$15,000.00 per month, calculated on a rolling three-month average* for  
14 services rendered to Debtor KSMP without obtaining approval of a fee  
15 application as described below; and (ii) the *aggregate amount paid to all*  
16 *Ordinary Course Professionals shall not exceed \$30,000.00 per month*  
*calculated on a rolling three-month average*; provided, however, that Debtor  
KSMP reserves the right to petition the Court to increase the aforementioned  
caps (the "Fee Caps") if necessary under the circumstances.
- 17 b) **Disclosure Requirements:** Each Ordinary Course Professional wishing to be  
18 retained in this Chapter 11 Case shall file with the Court and serve via electronic  
19 mail the *Declaration and Questionnaire*, substantially in the forms attached to  
20 the Proposed Order as Exhibits 2 and 3, which **discloses (i) the type and**  
21 **description of the services to be provided, (ii) arrangements for**  
22 **compensation, (iii) prepetition claims against Debtor KSMP, and (iv) the**  
23 **nature of any interest adverse to Debtor KSMP.**<sup>3</sup> Service of the Declaration  
24 and Questionnaire shall be made on the following parties (each, a "Notice Party"  
and collectively, the "Notice Parties"): (i) the Office of the United States Trustee  
25 (the "U.S. Trustee"); (ii) Debtor KSMP; (iii) counsel for Debtor KSMP; (iv) the  
26 Committee; (v) counsel for the LeFever Mattson Debtors; (vi) Serene Investment  
Management, LLC, as DIP Lender and (vii) those persons who have formally  
appeared in these Chapter 11 Cases.
- 27 c) **Objection Process:** The Notice Parties shall have *14 days after an Ordinary*  
28 *Course Professional's filing of its completed Declaration and Questionnaire*

<sup>3</sup> Those professionals on the Initial OCP List have each completed the *Declaration and Questionnaire*,  
which are submitted herewith as Exhibit B.

(the “Objection Deadline”) to object to the retention of the Ordinary Course Professional. Objections, if any, shall be filed with the Court and served upon the Notice Parties and the respective Ordinary Course Professional on or before the Objection Deadline. If no objections are timely filed (or if any objection is resolved as described below), the Ordinary Course Professional will be ***deemed approved without further order of the Court***. If an objection cannot be resolved and withdrawn within 10 days after service, the matter will be ***scheduled for hearing*** before the Court.

d) **Procedures for Supplementing the Initial OCP List:**

Should Debtor KSMP elect to supplement the list of Ordinary Course Professionals to add additional Ordinary Course Professionals, Debtor KSMP shall ***file a supplemental list with this Court*** describing the additional Ordinary Course Professionals (the “Supplement”) and shall ***serve the Supplement on the Notice Parties***.

Any additional Ordinary Course Professionals shall file and serve a completed ***Declaration and Questionnaire*** on the Notice Parties. The Notice Parties shall be required to object to any newly added Ordinary Course Professional no later than ***14 days after the filing of the Declaration and Questionnaire*** prepared by such newly proposed Ordinary Course Professional (the “Additional OCP Objection Deadline”).

If no objection is timely filed, the additional Ordinary Course Professional will be ***deemed approved without further order of the Court***. Objections, if any, shall be filed with the Court and served upon the Notice Parties and the respective additional Ordinary Course Professional by the Additional OCP Objection Deadline. If an objection ***cannot be resolved and withdrawn within 10 days after service, the matter will be scheduled for hearing*** before the Court.

e) **Payments Procedures:** No Ordinary Course Professional may be paid any amount for invoiced fees and expenses ***unless and until*** the Ordinary Course Professional has been retained in accordance with these procedures.

Each Ordinary Course Professional may submit periodic invoices to Debtor KSMP in the ordinary course of business. Such invoices must set forth in reasonable detail the nature of the services rendered and disbursements actually incurred by such professional. Provided that the Ordinary Course Professional’s invoiced fees and disbursements ***stay within the Fee Caps*** set forth above and are otherwise acceptable to Debtor KSMP in its reasonable business judgment, Debtor KSMP may pay each approved Ordinary Course Professional, without a prior application to the Court, ***100% of the fees and disbursements incurred*** by the Ordinary Course Professional in the ordinary course of business.

If an Ordinary Course Professional seeks payment of an amount that would exceed the Fee Cap (either as to the professional individually or as to the overall



1 Ordinary Professional fee cap), such professional will be required to file a fee  
2 application for the full amount of its fees and expenses in accordance with  
3 sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local  
4 Rules, and orders of the Court applicable to chapter 11 professionals retained  
under section 327 of the Bankruptcy Code, and any applicable guidelines, unless  
the U.S. Trustee and Committee agree otherwise.

5 f) **Periodic Reporting Requirements:** Within *thirty (30) days after the end of*  
6 *each quarterly period*, Debtor KSMP will *file a statement with the Court and*  
7 *serve the same on the Notice Parties*, certifying Debtor KSMP's compliance  
8 with the terms of the relief requested herein. The statement shall include for each  
9 Ordinary Course Professional: (a) the name of such Ordinary Course  
10 Professional; (b) the amount paid as compensation for services rendered and  
11 reimbursement of expenses incurred by each Ordinary Course Professional  
12 during the previous quarter; (c) a general description of the services rendered by  
each Ordinary Course Professional during the previous quarter; and (d) the total  
amount paid post-petition to each Ordinary Course Professional. Debtor KSMP  
will continue to file such statements through the earlier of dismissal or  
conversion of the instant chapter 11 case or the confirmation of a chapter 11  
plan.

13 g) **Final Reporting Requirements:** Debtor KSMP shall file with the Court a *final*  
14 *statement within the time established for professionals to file their final fee*  
15 *applications* (the "Final Statement") and such statement shall include the  
16 following information: (a) the aggregate amount paid to each Ordinary Course  
Professional during the previous 90 days; (b) a general description of the services  
17 rendered by each Ordinary Course Professional during such period; and (c) the  
total amount paid post-petition to each Ordinary Course Professional.

#### 18 **IV. RELIEF REQUESTED**

19 Pursuant to sections 105(a), 327, 328 and 330 of the Bankruptcy Code, and Bankruptcy  
20 Rule 2014, Debtor KSMP hereby seeks entry of an order, substantially in the form of the Proposed  
21 Order submitted herewith, authorizing it to retain, employ and pay the Ordinary Course  
22 Professionals in the ordinary course of Debtor KSMP's business on the terms and conditions set  
23 forth herein, without the submission of separate retention or fee applications and without the  
issuance of separate retention and compensation orders for each Ordinary Course Professional.

#### 24 **V. BASIS FOR RELIEF REQUESTED**

25 Debtor KSMP seeks authority to retain and compensate Ordinary Course Professionals  
26 pursuant to streamlined procedures, rather than through the filing of individual retention and fee  
27

1 applications. This approach is both consistent with applicable law and necessary to ensure the  
2 efficient and cost-effective administration of the estate. The Ordinary Course Professionals are not  
3 bankruptcy professionals whose services are central to the administration of this Chapter 11 Case;  
4 rather, they provide routine services essential to Debtor's ongoing operations. Requiring each such  
5 professional to file separate retention and fee applications would impose unnecessary cost and  
6 administrative burden on the estate, the Court, and the Office of the United States Trustee, with no  
7 corresponding benefit to stakeholders. The streamlined procedures requested here provide  
8 appropriate transparency while avoiding needless expense and disruption.

9         The Bankruptcy Code requires prior Court approval only for the retention and payment of  
10 "professional persons," as that term is used in section 327(a). Courts have consistently held that  
11 this phrase is a term of art, limited to those individuals whose work is central to the administration  
12 of the bankruptcy estate. *See, e.g., In re Parkinson Seed Farm, Inc.*, 640 B.R. 218, 255 (Bankr. D.  
13 Id. 2022) (setting out factors for determining "professional" status); *In re Argus Group 1700, Inc.*,  
14 199 B.R. 525, 534 (Bankr. E.D. Pa. 1996) ("[T]he term 'professional person' is a 'term of art'  
15 reserved for those persons who play an intimate role in the reorganization of a debtor's estate")  
16 (*quoting In re Johns-Manville Corp.*, 60 B.R. 612, 619 (Bankr. S.D.N.Y. 1986)); *In re That's*  
17 *Entertainment Mkt'g Group, Inc.*, 168 B.R. 226, 230 (N.D. Cal. 1994) ("professional person" under  
18 section 327 refers to professionals whose duties are central to the administration of the estate).

19         In determining whether a party qualifies as a "professional person," courts consider factors  
20 such as whether the professional manages or disposes of estate assets significant to the  
21 reorganization, participates in negotiating plan terms, or plays a direct role in in the administering  
22 the debtor's chapter 11 case. *See In re Parkinson Seed Farm*, 640 B.R. at 256. By contrast, parties  
23 whose work is limited to the routine maintenance of the debtor's business operations are not  
24 deemed "professionals" within the meaning of section 327(a). *See id.*

25         Applying these factors, the Ordinary Course Professionals identified on the Initial OCP List  
26 are not "professionals" within the meaning of section 327(a) of the Bankruptcy Code. They will  
27 not counsel the Debtor on restructuring strategy, participate in plan negotiations, or otherwise



1 advise on case administration. Their role will be limited to assisting Debtor KSMP in the routine  
2 operation of its business—specifically in addressing landlord-tenant disputes. To the extent that  
3 their work touches on estate administration at all, it will be minimal or tangential.

4 Because these professionals fall outside of the scope of sections 327(a), their retention and  
5 payment need not be approved by the Court under sections 327-331 of the Bankruptcy Code.  
6 Nevertheless, out of an abundance of caution and in the interest of transparency, Debtor KSMP  
7 seeks approval of the streamlined procedures described in this Motion. These procedures will allow  
8 Debtor KSMP to retain and compensate the Ordinary Course Professionals identified on the Initial  
9 OCP List (as supplemented from time to time) without unnecessary delay or expense, while still  
10 providing stakeholders and the Court with notice and oversight.

11 Courts in this District and others routinely approve procedures of the type proposed here.  
12 *See, e.g., In re The Roman Catholic Bishop of Santa Rosa*, Case No. 23-10113 (Bankr. N.D. Cal.  
13 2023) [Dkt. No. 297]; *In re Watsonville Hospital Corporation*, Case No. 21-51477, (Bankr. N.D.  
14 Cal. 2022) [Dkt. No. 172]; *In re Wave Computing, Inc.*, Case No. 20-50682, (Bankr. N.D. Cal.  
15 2020) [Dkt. No. 253]; *In re Pacific Gas & Electric Corp.*, Case No. 19-30088 (Bankr. N.D. Cal.  
16 2019) [Dkt. No. 707]; *In re Verity Health System of California, Inc.*, Case No. 18-20151 (Bankr.  
17 C.D. Cal. 2018) [Dkt. No. 693]; *In re Quantum Fuel Systems Technology Worldwide, Inc.*, Case  
18 No. 16-11202 (Bankr. C.D. Cal. 2016) [Dkt. No. 295]; *In re Freedom Communications, Inc.*, Case  
19 No. 15-15311 (Bankr. C.D. Cal. 2015) [Dkt. No. 314]. The streamlined procedures proposed in this  
20 Motion are consistent with this well-established practice.

21 Finally, Debtor KSMP is not requesting authority to pay any prepetition amounts owed to  
22 Ordinary Course Professionals. The relief sought applies only to fees and expenses incurred during  
23 the pendency of this Chapter 11 Case, subject to the procedures outlined herein.

#### 24 **NOTICE**

25 Notice of this Motion will be provided to (i) the U.S. Trustee; (ii) the Committee; (iii) Serene  
26 Investment Management, LLC, the DIP Lender; and (iv) those persons who have formally appeared  
27 in these Chapter 11 Cases and requested service pursuant to Bankruptcy Rule 2002. Based on the

1 circumstances surrounding this Motion and the nature of the relief requested herein, the Debtor  
2 respectfully submits that no further notice is required.

3 **CONCLUSION**

4 **WHEREFORE**, Debtor KSMP respectfully requests entry of an order, substantially in the  
5 form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further  
6 relief as the Court may deem just and appropriate.

7  
8 DATED: November 7, 2025

/S/ Richard L. Wynne

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16 *Attorneys for Debtor and Debtor in*  
17 *Possession*

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**Exhibit A**  
**Proposed Order**

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

In re  
LEFEVER MATTSON, a California  
corporation, et al.  
Debtors.<sup>4</sup>

In re  
KS MATTSON PARTNERS, LP,  
Debtor.

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

**[PROPOSED] ORDER AUTHORIZING  
DEBTOR KSMP'S APPLICATION FOR AN  
ORDER (I) AUTHORIZING THE  
RETENTION AND PAYMENT, AS OF  
AUGUST 22, 2025, OF PROFESSIONALS  
UTILIZED BY DEBTOR KSMP IN THE  
ORDINARY COURSE OF BUSINESS AND  
(II) GRANTING RELATED RELIEF**

Date: December 3, 2025  
Time: 11:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court,  
1300 Clay Street, Courtroom 215  
Oakland, CA 94612

<sup>4</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 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>.

1 This Court has considered Debtor KSMP's *Motion for an Order (I) Authorizing the Retention and*  
2 *Payment, Effective as of August 22, 2025, of Professionals Utilized by Debtor KSMP in the Ordinary*  
3 *Course of Business and (II) Granting Related Relief* (the "Motion"). This Court has found that (i) this  
4 Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (ii) venue is proper in  
5 this district pursuant to 28 U.S.C. §§ 1408 and 1409 and (iii) notice of the Motion and the Hearing was  
6 sufficient under the circumstances. After due deliberation, this Court has determined that the relief  
7 requested in the Motion is in the best interests of Debtor KSMP, its estate and its creditors, and good  
8 and sufficient cause having been shown,

10 **IT IS HEREBY ORDERED THAT:**

11 1. The Motion is GRANTED as set forth herein.  
12 2. Pursuant to sections 105(a), 327, 328 and 330 of the Bankruptcy Code and  
13 Bankruptcy Rule 2014(a), to the extent deemed necessary or appropriate by Debtor KSMP, Debtor  
14 KSMP is authorized to employ Ordinary Course Professionals in the ordinary course of Debtor  
15 KSMP's business, effective as of August 22, 2025.

17 3. Debtor KSMP is hereby permitted to retain and pay each Ordinary Course  
18 Professional, including but not limited to those identified on the Initial OCP List attached to the  
19 Motion as Exhibit B, without prior application to this Court, pursuant to the following OCP  
20 Procedures:

22 (a) **Ordinary Course Professional Fee Caps:** During the pendency of this case:  
23 (i) no Ordinary Course Professional listed on the Initial OCP List will be paid  
24 more than *\$15,000.00 per month, calculated on a rolling three-month*  
25 *average* for services rendered to Debtor KSMP without obtaining approval of  
26 a fee application as described below; and (ii) the *aggregate amount paid to all*  
27 *Ordinary Course Professionals shall not exceed \$30,000.00 per month*  
28 *calculated on a rolling three-month average*; provided, however, that Debtor  
KSMP reserves the right to petition the Court to increase the aforementioned  
caps (the "Fee Caps") if necessary under the circumstances.

(b) **Disclosure Requirements:** Each Ordinary Course Professional wishing to be

1 retained in this Chapter 11 Case shall file with the Court and serve via  
2 electronic mail the ***Declaration and Questionnaire***, substantially in the forms  
3 attached to the Proposed Order as ***Exhibits 2*** and ***3***, which **discloses (i) the**  
4 **type and description of the services to be provided, (ii) arrangements for**  
5 **compensation, (iii) prepetition claims against Debtor KSMP, and (iv) the**  
6 **nature of any interest adverse to Debtor KSMP.** Service of the Declaration  
7 and Questionnaire shall be made on the following parties (each, a “Notice  
8 Party” and collectively, the “Notice Parties”): (i) the Office of the United  
9 States Trustee (the “U.S. Trustee”); (ii) Debtor KSMP; (iii) counsel for Debtor  
10 KSMP; (iv) the Committee; (v) counsel for Debtor KSMP; (vi) Serene  
11 Investment Management, LLC, as DIP Lender; and (vii) those persons who  
12 have formally appeared in this Chapter 11 Case.

- 13 (c) **Objection Process:** The Notice Parties shall have ***14 days after an Ordinary***  
14 ***Course Professional’s filing of its completed Declaration and Questionnaire***  
15 (the “Objection Deadline”) to object to the retention of the Ordinary Course  
16 Professional. Objections, if any, shall be filed with the Court and served upon  
17 the Notice Parties and the respective Ordinary Course Professional on or  
18 before the Objection Deadline. If no objections are timely filed (or if any  
19 objection is resolved as described below), the Ordinary Course Professional  
20 will be ***deemed approved without further order of the Court***. If an objection  
21 cannot be resolved and withdrawn within 10 days after service, the matter will  
22 be ***scheduled for hearing*** before the Court.

23 (d) **Procedures for Supplementing the Initial OCP List:**

24 Should Debtor KSMP elect to supplement the list of Ordinary Course  
25 Professionals to add additional Ordinary Course Professionals, Debtor KSMP  
26 shall ***file a supplemental list with this Court*** describing the additional  
27 Ordinary Course Professionals (the “Supplement”) and shall ***serve the***  
28 ***Supplement on the Notice Parties***.

Any additional Ordinary Course Professionals shall file and serve a ***completed***  
***Declaration and Questionnaire*** on the Notice Parties. The Notice Parties shall  
be required to object to any newly added Ordinary Course Professional no later  
than ***14 days after the filing of the Declaration and Questionnaire*** prepared  
by such newly proposed Ordinary Course Professional (the “Additional OCP  
Objection Deadline”).

If no objection is timely filed, the additional Ordinary Course Professional will  
be ***deemed approved without further order of the Court***. Objections, if any,  
shall be filed with the Court and served upon the Notice Parties and the  
respective additional Ordinary Course Professional by the Additional OCP  
Objection Deadline. If an objection ***cannot be resolved and withdrawn within***  
***10 days after service, the matter will be scheduled for hearing*** before the  
Court.

- (e) **Payments Procedures:** No Ordinary Course Professional may be paid any



amount for invoiced fees and expenses *unless and until* the Ordinary Course Professional has been retained in accordance with these procedures.

Each Ordinary Course Professional may submit periodic invoices to Debtor KSMP in the ordinary course of business. Such invoices must set forth in reasonable detail the nature of the services rendered and disbursements actually incurred by such professional. Provided that the Ordinary Course Professional's invoiced fees and disbursements *stay within the Fee Caps* set forth above and are otherwise acceptable to Debtor KSMP in its reasonable business judgment, Debtor KSMP may pay each approved Ordinary Course Professional, without a prior application to the Court, *100% of the fees and disbursements incurred* by the Ordinary Course Professional in the ordinary course of business.

In the event that an Ordinary Course Professional seeks payment of an amount that would exceed the Fee Cap (either as to the professional individually or as to the overall Ordinary Professional fee cap), such professional will be required to file a fee application for the full amount of its fees and expenses in accordance with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of the Court applicable to chapter 11 professionals retained under section 327 of the Bankruptcy Code, and any applicable guidelines, unless the U.S. Trustee and Committee agree otherwise.

(f) **Periodic Reporting Requirements:** Within *thirty (30) days after the end of each quarterly period*, Debtor KSMP will *file a statement with the Court and serve the same on the Notice Parties*, certifying Debtor KSMP's compliance with the terms of the relief requested herein. The statement shall include for each Ordinary Course Professional: (a) the name of such Ordinary Course Professional; (b) the amount paid as compensation for services rendered and reimbursement of expenses incurred by each Ordinary Course Professional during the previous quarter; (c) a general description of the services rendered by each Ordinary Course Professional during the previous quarter; and (d) the total amount paid post-petition to each Ordinary Course Professional. Debtor KSMP will continue to file such statements through the earlier of dismissal or conversion of the instant chapter 11 case or the confirmation of a chapter 11 plan.

(g) **Final Reporting Requirements:** Debtor KSMP shall file with the Court a *final statement within the time established for professionals to file their final fee applications* (the "Final Statement") and such statement shall include the following information: (a) the aggregate amount paid to each Ordinary Course Professional during the previous 90 days; (b) a general description of the services rendered by each Ordinary Course Professional during such period; and (c) the total amount paid post-petition to each Ordinary Course Professional.

1           4.       The *nunc pro tunc* relief set forth in paragraph 2, above, shall not apply to any  
2 Ordinary Course Professional listed for the first time in a Supplement.

3           5.       Notwithstanding any of the foregoing, Debtor KSMP shall separately file an  
4 application to retain any Ordinary Course Professional that becomes materially involved in the  
5 administration of this Chapter 11 Case pursuant to section 327 of the Bankruptcy Code  
6

7           6.       Entry of this Order and approval of the OCP Procedures does not affect Debtor  
8 KSMP's right to dispute any invoice submitted by an Ordinary Course Professional.

9           7.       Debtor KSMP is hereby authorized to take such actions and to execute such  
10 documents as may be necessary to implement the relief granted by this Order.

11           8.       This Court shall retain jurisdiction to hear and determine all matters arising from or  
12 related to the interpretation, implementation and/or enforcement of this Order.  
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14                               \*\* END OF ORDER \*\*  
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**Exhibit 1**

**Initial List of Ordinary Course Professionals**

<b>Name</b>	<b>Address</b>	<b>Professional Service</b>	<b>Estimated Amount</b>
Dinsmore & Shohl LLP	655 West Broadway, Suite 800 San Diego, CA 92101	Real Estate Litigation Counsel (San Diego)	\$15,000.00 per month, calculated on a rolling three- month average
Zyromski Konicek LLP	613 Fourth Street, Suite 203 Santa Rosa, CA 95404	Real Estate Litigation Counsel (Northern California)	\$5,000.00 per month, calculated on a rolling three- month average

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**EXHIBIT 2**  
**Ordinary Course Professionals Declaration**

1 Richard L. Wynne (Bar No. 120349)  
2 richard.wynne@hoganlovells.com  
3 Erin N. Brady (Bar No. 215038)  
4 erin.brady@hoganlovells.com  
5 Edward J. McNeilly (Bar No. 314588)  
6 edward.mcneilly@hoganlovells.com  
7 HOGAN LOVELLS US LLP  
8 1999 Avenue of the Stars, Suite 1400  
9 Los Angeles, California 90067  
10 Telephone: (310) 785-4600  
11 Facsimile: (310) 785-4601

12 *Attorneys for Debtor and Debtor in Possession*

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

16 In re  
17 LEFEVER MATTSON, a California  
18 corporation, et al.

19 Debtors.<sup>5</sup>

20 In re  
21 KS MATTSON PARTNERS, LP,  
22 Debtor.

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

26 **DECLARATION AND DISCLOSURE**  
27 **STATEMENT OF \_\_\_\_\_ ON**  
28 **BEHALF OF \_\_\_\_\_**

29 \_\_\_\_\_  
30 <sup>5</sup> The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the  
31 tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is  
32 c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever  
33 Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621. Due to the large  
34 number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of  
35 their federal tax identification numbers is not provided herein. A complete list of such information may be  
36 obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>.

1 To be completed by Professionals engaged by KS Mattson Partners, as debtor and debtor in  
2 possession ("Debtor KSMP"), in the above-captioned chapter 11 case.

3 I, \_\_\_\_\_, hereby declare as follows:

4 1. I am a \_\_\_\_\_ at \_\_\_\_\_, located at  
5 \_\_\_\_\_ (the "Firm").

6  
7 2. Debtor KSMP has requested that the Firm provide services related to  
8 \_\_\_\_\_, and the Firm has agreed to provide those  
9 services (the "Services").

10 3. The Services include, but are not limited to, the following:  
11 \_\_\_\_\_  
12 \_\_\_\_\_

13  
14 4. The Firm may have performed services in the past and may perform services in the  
15 future, in matters unrelated to this chapter 11 case, for persons that are parties in interest in the KSMP  
16 Debtor's chapter 11 case. As part of its customary practices, the Firm is retained in cases, proceedings,  
17 and transactions involving many different parties, some of whom may be claimants of Debtor KSMP,  
18 or may represent or be other parties in interest in this chapter 11 case. The Firm does not perform  
19 services for any such person in connection with this chapter 11 case. In addition, the Firm does not  
20 have any relationship with any such person, such person's attorneys, or such person's accountants  
21 that would be adverse to the Debtor or its estate with respect to the matters on which the Firm is to  
22 be retained.  
23

24 5. Neither I, nor any principal of, or any professional employed by the Firm has agreed  
25 to share or will share any portion of the compensation to be received from Debtor KSMP with any  
26 other person other than principals or regular employees of the Firm.  
27  
28



1           6.       The Firm received from the Debtor a schedule of key parties in interest in this Chapter  
2 11 Case, a copy of which is attached hereto as Exhibit A.

3           7.       Except as otherwise disclosed on Exhibit B to this Declaration, neither I nor any  
4 principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or  
5 represents any interest materially adverse to the Debtor or its estate with respect to the matters on  
6 which the Firm is to be retained.

8           8.       As of the commencement of this chapter 11 case, the Debtor owed the Firm  
9 \$\_\_\_\_\_ in respect of prepetition services rendered to the Debtor

10          9.       If at any time during the period of its employment, if the Firm should discover any  
11 facts bearing on the matters described herein, the Firm will supplement the information contained in  
12 this Declaration.

13               Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United  
14 States of America that the foregoing is true and correct, and that this Declaration and Disclosure  
15 Statement was executed on \_\_\_\_\_, 2025, at \_\_\_\_\_.

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19 \_\_\_\_\_  
20 Declarant Name  
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**Exhibit A to Declaration**

**Parties-in-Interest Reviewed for Current and Recent Former Relationships**

**1. Debtor KSMP**

K.S. Mattson Partners, LP

**2. Lefever Mattson Debtors**

Apan Partners, LLC

Autumn Wood I, LP

Bay Tree, LP

Beach Pine, LP

Bishop Pine, LP

Black Walnut, LP

Buck Avenue Apartments, LP

Buckeye Tree, LP

Bur Oak, LP

Butcher Road Partners, LLC

California Investment Properties, a California corporation

Cambria Pine, LP

Chestnut Oak, LP

Country Oaks I, LP

Divi Divi Tree, L.P.

Douglas Fir Investments, LP

Firetree I, LP

Firetree II, LP

Firetree III, LP

Foxtail Pine, LP

Ginko Tree, LP

Golden Tree, LP

Hagar Properties, LP

Heacock Park Apartments, LP

Home Tax Service of America, Inc. dba LeFever Mattson Property Management

LeFever Mattson I, LLC

LeFever Mattson, a California corporation

Live Oak Investments, LP

Monterey Pine, LP

Napa Elm, LP

Nut Pine, LP

Pinecone, LP

Pinewood Condominiums, LP

Ponderosa Pines, LP

Red Cedar Tree, LP

Red Mulberry Tree, LP

Red Oak Tree, LP

1 Red Oak, LP  
2 Red Spruce Tree, LP  
3 Redbud Tree, LP  
4 River Birch, LP  
5 River Tree Partners, LP  
6 River View Shopping Center 1, LLC  
7 River View Shopping Center 2, LLC  
8 RT Capitol Mall, LP  
9 RT Golden Hills, LP  
10 Scotch Pine, LP  
11 Sequoia Investment Properties, LP  
12 Sienna Pointe, LLC  
13 Spruce Pine, LP  
14 Tradewinds Apartments, LP  
15 Vaca Villa Apartments, LP  
16 Valley Oak Investments, LP  
17 Watertree I, LP  
18 Willow Oak, LP  
19 Windscape Apartments I, LP  
20 Windscape Apartments II, LP  
21 Windscape Apartments, LLC  
22 Windscape Holdings, LLC  
23 Windtree, LP  
24 Yellow Poplar, LP

25 **3. Lefever Mattson Non-Debtor Affiliate/Subsidiary Companies**

26 Harrow Cellars, a California corporation  
27 Pineapple Bear, a California corporation

28 **4. Non-Debtor Affiliate/Subsidiary Companies**

Perris Freeway Partners, LP  
Specialty Property Partners, LP  
Treehouse Investments, LP

**5. Debtor's Professionals**

Hogan Lovells US LLP  
Stapleton Group, a part of J.S. Held  
Robbin L. Itkin

**6. Insiders**

Kenneth Mattson  
Stacy Mattson  
K S Mattson Company, LLC

1       **7. Committee Members**

2 Charles Edgar  
3 Hayes 2004 Family Trust  
4 Lull Family Living Revocable Trust  
5 Manfred K. Fischer Trust  
6 Mullin Family Trust  
7 The Anderson 2001 Revocable Trust  
8 Umbriac & Tubley Family Trust  
9 Walter Schenk

10       **8. Committee Professionals**

11 PwC  
12 Pachulski, Stang, Ziehl & Jones, LLP

13       **9. Unsecured Creditors**

14 Andrew Viesca  
15 Ariana Vierya  
16 Auditor-Controller's Agency Alameda County  
17 Auditor-Controller Treasurer-Tax Collector Department Santa Rosa  
18 Bass Medical  
19 Beverly Ann Jones  
20 Brad Driver, by and through the personal representative and administrator of his estate, Mariah  
21 Driver  
22 Carlos Guillermo and Olaya Orozco  
23 Central Valley Regional Water Board  
24 Charlene Hultman  
25 China Roberson  
26 Citrus Heights - Water  
27 City Of Del Mar - Water  
28 City Of Sonoma – Water  
29 Danny Valencia  
30 Darice Decker  
31 David Wenzel  
32 Department of Treasury Internal Revenue Service  
33 EDCO  
34 Fennemore Wendel  
35 Fidelity National Title Insurance Company  
36 Franchise Tax Board  
37 Jane Zimmerman  
38 Y. Tito Sasaki and Janey L. Sasaki Trust  
39 Jeremy Bussey  
40 Jim Walker  
41 Joan Muriel Pacheco  
42 John Jeffers Trust  
43 Jose Manuel

1 Jose Martinez  
2 Kenneth George Dow, AKA Ken Dow Trust  
3 Lefever Mattson  
4 Lucio Garcia  
5 Marc and Susan Piper  
6 Marc Lair  
7 Mark D and Jacque L Winger  
8 Mark Nielsen  
9 Marsha Copeland  
10 Mary Lou Martin  
11 Mayte Hernandez and Luis Pelayo  
12 McPhail Fuel Company  
13 Pacific Gas and Electric  
14 Pauline Louise Dow, AKA Pauline Dow Trust  
15 Perry Pownall  
16 Phillip Hoang – Postmaster  
17 Plaintiffs in Claridget et al. Litigation  
18 Plaintiffs in Lefever v. Mattson Litigation  
19 Plaintiffs in Tubley et al. Litigation  
20 Plaintiffs in Wondra et al. Litigation  
21 Rajeswori Shrestha  
22 Recology  
23 Santos Castro  
24 Sara Lopez  
25 Scott Nichols  
26 Securities & Exchange Commission, SEC v. Mattson, et al.  
27 Sherri Perlovich  
28 Sonoma Garbage Collectors  
Stapleton Group  
State Farm  
Tax Collector, Solano County  
Tina M. Stott, as an individual and trustee to the Tina M. Stott family trust dated 3/17/2017  
Tamara Miglioizzi v. Mattson et al.  
Trustees, Eandi Living Trust  
Trustees, Luis Martinez and Elizabeth Martinez Living Trust  
Uriel Gonzalez  
VOM Water District  
Warren and Hope Elliott  
Wesley Edgar Boykin  
William and Linda Rice  
Windtree, LP

**10. Secured Creditors**

Axos Bank  
Bank of America NA  
Bank of New York, Trustee, on behalf the Alternative Loan Trust 2007  
Bank of New York Mellon

1 Citadel Environmental Services, Inc.  
2 Company, Trustee for Residential Accredited Loans  
3 Dept of Child Support Services  
4 Deutsche Bank Trust Company  
5 Employment Development Department  
6 Flagstar Bank  
7 Hampton Mortgage Group Inc.  
8 John Chang  
9 JPMorgan Chase Bank, N.A.  
10 LAFM Loan Owners, LLC  
11 MERS, Nominee for BOFI Federal Bank  
12 ReProp Financial Mortgage Investors, LLC  
13 Robert Bass LLC  
14 Socotra  
15 Socotra - for HFS Fund IV, LLC  
16 Socotra Capital Inc.  
17 Socotra Opportunity Fund, LLC  
18 Socotra Opportunity REIT I LLC  
19 Socotra REIT I LLC  
20 Sonoma County Tax Collector  
21 Sonoma Ranch Homeowners Association  
22 Sylva Family Properties  
23 The Mercato Association  
24 Trustee of the John and Mary Metallinos Living Trust  
25 Trustee, Gerald and Carol Shiffman Joint Trust  
26 US Bank NA  
27 WE Alliance Secured Income Fund, LLC

## 17 **11. Litigation Claims**

18 Brad Driver, by and through the Personal Representative and Administrator of His Estate, Mariah  
19 Driver, Plaintiff  
20 Mark Nielsen, Plaintiff  
21 Tina M. Stott, as an Individual and Trustee to the Tina M. Stott Family Trust Dated 3/17/2017,  
22 Plaintiff  
23 Jeanne Wondra, as Trustee for the James Hurley Trust, et al., Plaintiff  
24 Timothy Lefever, Plaintiff  
25 Tamara D. Migliozi, Plaintiff  
26 Andrew Tubley, Plaintiff  
27 Benedetti Farms, Inc., Plaintiff  
28 Securities & Exchange Commission, Plaintiff

## 25 **12. Tenants / Persons in Occupation of KSMP Properties**

26 Ariana Vierya  
27 A Spa Massage Parlor  
28 Bass Medical - Winston Vaughan  
Beverly Ana Jones



1 Carlos Guillermo Olaya Orozco  
China Roberson  
2 Danny Valencia  
3 Darice Decker  
El Gran Taco  
4 Empire Barber Studio  
Equitable Ocean Front LLC  
5 Equitable Ocean, Inc.  
Hannah Mattson  
6 Hari/Niranjan Shrestha  
Jackie Stromberg  
7 Jane Zimmerman  
8 Jim Walker  
Jose Martinez  
9 Jose Perez  
Ken Mattson  
10 Lucio Guerra  
Marc and Susan Piper  
11 Marc Lair  
12 Mark Nielsen  
Mayte Hernandez, Luis Pelayo  
13 Matthew Treger  
14 Mere Mauitoga  
Perry Pownall  
15 Rachel Liles  
Ricardo, Maricela and Daughter  
16 Ricky Page  
Roberto/Tienda Iniquez  
17 Santos Castro  
Santos Perez Reyes, Viviana  
18 Sara Lopez  
19 Scott Nichols  
Sherri Perlovich  
20 Uriel Gonzalez  
US Post Office  
21 Wesley Edgar Boykin  
William and Linda Rice  
22 Yolanda Rodriguez

23 **13. Bankruptcy Judges**

24 Chief Judge Stephen L. Johnson  
25 Judge Hannah L. Blumenstiel  
26 Judge M. Elaine Hammond  
Judge William Lafferty  
27 Judge Dennis Montali  
28 Judge Charles Novack

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**14. Bankruptcy Court Staff**

Ruby Bautista  
Dina Kakalia  
Ardie Ermac  
Venice Tamplin-Henderson  
Teresa Mkhitarian  
Cindy Fan

**15. United States Trustee Staff**

Christina Goebelsmann  
Mike Chow  
Ianthe V. Del Rosario  
Nychelle G. Rivera  
Phillip Shine  
Yung Nor Wong  
Jared Day  
Deanna Hazelton

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**Exhibit B to Declaration**  
**Connections with Parties in Interest**

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**Exhibit 3**  
**Retention Questionnaire**

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

*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.<sup>1</sup>

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

**RETENTION QUESTIONNAIRE**

In re  
KS MATTSON PARTNERS, LP,  
Debtor.

To be completed by Professionals engaged by KS Mattson Partners, as debtor and debtor in possession (“Debtor KSMP”), in the above-captioned chapter 11 case.

All questions **must** be answered. Please use “none,” “not applicable,” or “N/A,” as appropriate. If more space is needed, please complete on a separate page and attach.

<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 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>.

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1. Name and address of professional:

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2. Date of retention: \_\_\_\_\_

3. Type of Services to be provided:

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4. Brief description of services to be provided:

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5. Arrangements for compensation (hourly, contingent, etc.):

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(a) Average hourly rate (if applicable): \_\_\_\_\_

(b) Estimated average monthly compensation based on prepetition retention (if  
company was employed prepetition): \_\_\_\_\_

6. Prepetition claims against the Debtor held by the company (if any):

Amount of claim: \$ \_\_\_\_\_

Date claim arose: \_\_\_\_\_

Nature of claim: \_\_\_\_\_

7. Prepetition claims against the Debtor (if any) held individually by any member,  
associate, or employee of the company:

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Name: \_\_\_\_\_

Status: \_\_\_\_\_

Amount of claim: \$ \_\_\_\_\_

Date claim arose: \_\_\_\_\_

Nature of claim: \_\_\_\_\_

8. Disclose the nature and provide a brief description of any interest adverse to the Debtor or its estate for the matters on which the professional is to be employed:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. Name and title of individual completing this form:

\_\_\_\_\_

Dated: \_\_\_\_\_, 2025

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Declarant Name

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**Exhibit B**

Declarations and Questionnaires of Professionals listed on Initial OCP List



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

*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.<sup>1</sup>

In re  
KS MATTSON PARTNERS, LP,  
Debtor.

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

**DECLARATION AND DISCLOSURE  
STATEMENT OF JOHN A. MAYERS ON  
BEHALF OF DINSMORE & SHOHL LLP**

Date: December 3, 2025  
Time: 11:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
1300 Clay Street, Courtroom 215  
Oakland, CA 94612

<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 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>.

1 I, John A. Mayers, hereby declare as follows:

2 1. I am a partner at Dinsmore Shohl LLP, located at 655 West Broadway, Suite 800  
3 San Diego, CA 92101 (the "Firm").  
4

5 2. Debtor KS Mattson Partners, LP ("Debtor KSMP") has requested that the Firm  
6 provide services related to residential real estate litigation services in the San Diego area, and the  
7 Firm has agreed to provide those services (the "Services").

8 3. The Firm may have performed services in the past and may perform services in  
9 the future, in matters unrelated to this chapter 11 case, for persons that are parties in interest in  
10 Debtor KSMP's chapter 11 case. As part of its customary practices, the Firm is retained in cases,  
11 proceedings, and transactions involving many different parties, some of whom may be claimants  
12 of Debtor KSMP, or may represent or be other parties in interest in this chapter 11 case. The Firm  
13 does not perform services for any such person in connection with this chapter 11 case. In addition,  
14 the Firm does not have any relationship with any such person, such person's attorneys, or such  
15 person's accountants that would be adverse to Debtor KSMP or its estate with respect to the  
16 matters on which the Firm is to be retained.  
17

18 4. Neither I, nor any principal of, or any professional employed by the Firm has  
19 agreed to share or will share any portion of the compensation to be received from Debtor KSMP  
20 with any other person other than principals or regular employees of the Firm.  
21

22 5. The Firm received from Debtor KSMP a schedule of key parties in interest in this  
23 chapter 11 case, a copy of which is attached hereto as **Exhibit A**.

24 6. Except as otherwise disclosed on **Exhibit B** to this Declaration, neither I nor any  
25 principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds  
26  
27  
28

1 or represents any interest materially adverse to Debtor KSMP or its estate with respect to the  
2 matters on which the Firm is to be retained.

3 7. As of the commencement of this chapter 11 case, Debtor KSMP owed the Firm  
4 \$0.00 in respect of prepetition services rendered to Debtor KSMP.  
5

6 8. If at any time during the period of its employment, if the Firm should discover any  
7 facts bearing on the matters described herein, the Firm will supplement the information contained  
8 in this Declaration.

9 I declare under penalty of perjury that the foregoing is true and correct.  
10

11 Executed on: November 4, 2025

12  
13 /s/ John A. Mayers

14 John A. Mayers  
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**Exhibit A**

**Parties-in-Interest Reviewed for Current and Recent Former Relationships**

**1. Debtor KSMP**

K.S. Mattson Partners, LP

**2. Lefever Mattson Debtors**

Apan Partners, LLC

Autumn Wood I, LP

Bay Tree, LP

Beach Pine, LP

Bishop Pine, LP

Black Walnut, LP

Buck Avenue Apartments, LP

Buckeye Tree, LP

Bur Oak, LP

Butcher Road Partners, LLC

California Investment Properties, a California corporation

Cambria Pine, LP

Chestnut Oak, LP

Country Oaks I, LP

Divi Divi Tree, L.P.

Douglas Fir Investments, LP

Firetree I, LP

Firetree II, LP

Firetree III, LP

Foxtail Pine, LP

Ginko Tree, LP

Golden Tree, LP

Hagar Properties, LP

Heacock Park Apartments, LP

Home Tax Service of America, Inc. dba LeFever Mattson Property Management

LeFever Mattson I, LLC

LeFever Mattson, a California corporation

Live Oak Investments, LP

Monterey Pine, LP

Napa Elm, LP

Nut Pine, LP

Pinecone, LP

Pinewood Condominiums, LP

Ponderosa Pines, LP

Red Cedar Tree, LP

Red Mulberry Tree, LP

1 Red Oak Tree, LP  
2 Red Oak, LP  
Red Spruce Tree, LP  
3 Redbud Tree, LP  
River Birch, LP  
4 River Tree Partners, LP  
River View Shopping Center 1, LLC  
5 River View Shopping Center 2, LLC  
6 RT Capitol Mall, LP  
RT Golden Hills, LP  
7 Scotch Pine, LP  
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8 Sienna Pointe, LLC  
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9 Tradewinds Apartments, LP  
10 Vaca Villa Apartments, LP  
Valley Oak Investments, LP  
11 Watertree I, LP  
Willow Oak, LP  
12 Windscape Apartments I, LP  
13 Windscape Apartments II, LP  
Windscape Apartments, LLC  
14 Windscape Holdings, LLC  
Windtree, LP  
15 Yellow Poplar, LP

16 **3. Lefever Mattson Non-Debtor Affiliate/Subsidiary Companies**

17 Harrow Cellars, a California corporation  
18 Pineapple Bear, a California corporation

19 **4. Non-Debtor Affiliate/Subsidiary Companies**

20 Perris Freeway Partners, LP  
21 Specialty Property Partners, LP  
Treehouse Investments, LP

22 **5. Debtor's Professionals**

23 Hogan Lovells US LLP  
24 Stapleton Group, a part of J.S. Held  
25 Robbin L. Itkin

26 **6. Insiders**

27 Kenneth Mattson  
28

1 Stacy Mattson  
2 K S Mattson Company, LLC

3 **7. Committee Members**

4 Charles Edgar  
5 Hayes 2004 Family Trust  
6 Lull Family Living Revocable Trust  
7 Manfred K. Fischer Trust  
8 Mullin Family Trust  
9 The Anderson 2001 Revocable Trust  
10 Umbriac & Tubley Family Trust  
11 Walter Schenk

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13 PwC  
14 Pachulski, Stang, Ziehl & Jones, LLP

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17 Ariana Vierya  
18 Auditor-Controller's Agency Alameda County  
19 Auditor-Controller Treasurer-Tax Collector Department Santa Rosa  
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21 Beverly Ann Jones  
22 Brad Driver, by and through the personal representative and administrator of his estate,  
23 Mariah Driver  
24 Carlos Guillermo and Olaya Orozco  
25 Central Valley Regional Water Board  
26 Charlene Hultman  
27 China Roberson  
28 Citrus Heights - Water  
29 City Of Del Mar - Water  
30 City Of Sonoma – Water  
31 Danny Valencia  
32 Darice Decker  
33 David Wenzel  
34 Department of Treasury Internal Revenue Service  
35 EDCO  
36 Fennemore Wendel  
37 Fidelity National Title Insurance Company  
38 Franchise Tax Board  
39 Jane Zimmerman  
40 Y. Tito Sasaki and Janey L. Sasaki Trust

1 Jeremy Bussey  
2 Jim Walker  
3 Joan Muriel Pacheco  
4 John Jeffers Trust  
5 Jose Manuel  
6 Jose Martinez  
7 Kenneth George Dow, AKA Ken Dow Trust  
8 Lefever Mattson  
9 Lucio Garcia  
10 Marc and susan Piper  
11 Marc Lair  
12 Mark D and Jacque L Winger  
13 Mark Nielsen  
14 Marsha Copeland  
15 Mary Lou Martin  
16 Mayte Hernandez and Luis Pelayo  
17 McPhail Fuel Company  
18 Pacific Gas and Electric  
19 Pauline Louise Dow, AKA Pauline Dow Trust  
20 Perry Pownall  
21 Phillip Hoang – Postmaster  
22 Plaintiffs in Claridget et al. Litigation  
23 Plaintiffs in Lefever v. Mattson Litigation  
24 Plaintiffs in Tubley et al. Litigation  
25 Plaintiffs in Wondra et al. Litigation  
26 Rajeswori Shrestha  
27 Recology  
28 Santos Castro  
Sara Lopez  
Scott Nichols  
Securities & Exchange Commission, SEC v. Mattson, et al.  
Sherri Perlovich  
Sonoma Garbage Collectors  
Stapleton Group  
State Farm  
Tax Collector, Solano County  
Tina M. Stott, as an individual and trustee to the Tina M. Stott family trust dated 3/17/2017  
Tamara Miglioizzi v. Mattson et al.  
Trustees, Eandi Living Trust  
Trustees, Luis Martinez and Elizabeth Martinez Living Trust  
Uriel Gonzalez  
VOM Water District  
Warren and Hope Elliott  
Wesley Edgar Boykin  
William and Linda Rice  
Windtree, LP

1  
2     **10. Secured Creditors**

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4     Bank of America NA  
5     Bank of New York, Trustee, on behalf the Alternative Loan Trust 2007  
6     Bank of New York Mellon  
7     Citadel Environmental Services, Inc.  
8     Company, Trustee for Residential Accredited Loans  
9     Dept of Child Support Services  
10    Deutsche Bank Trust Company  
11    Employment Development Department  
12    Flagstar Bank  
13    Hampton Mortgage Group Inc.  
14    John Chang  
15    JPMorgan Chase Bank, N.A.  
16    LAFM Loan Owners, LLC  
17    MERS, Nominee for BOFI Federal Bank  
18    ReProp Financial Mortgage Investors, LLC  
19    Robert Bass LLC  
20    Socotra  
21    Socotra - for HFS Fund IV, LLC  
22    Socotra Capital Inc.  
23    Socotra Opportunity Fund, LLC  
24    Socotra Opportunity REIT I LLC  
25    Socotra REIT I LLC  
26    Sonoma County Tax Collector  
27    Sonoma Ranch Homeowners Association  
28    Sylva Family Properties  
29    The Mercato Association  
30    Trustee of the John and Mary Metallinos Living Trust  
31    Trustee, Gerald and Carol Shiffman Joint Trust  
32    US Bank NA  
33    WE Alliance Secured Income Fund, LLC

34     **11. Litigation Claims**

35     Brad Driver, by and through the Personal Representative and Administrator of His Estate,  
36     Mariah Driver, Plaintiff  
37     Mark Nielsen, Plaintiff  
38     Tina M. Stott, as an Individual and Trustee to the Tina M. Stott Family Trust Dated  
39     3/17/2017, Plaintiff  
40     Jeanne Wondra, as Trustee for the James Hurley Trust, et al., Plaintiff  
41     Timothy Lefever, Plaintiff  
42     Tamara D. Migliozi, Plaintiff  
43     Andrew Tubley, Plaintiff



1 Benedetti Farms, Inc., Plaintiff  
2 Securities & Exchange Commission, Plaintiff

3 **12. Tenants / Persons in Occupation of KSMP Properties**

4 Ariana Vierya  
5 A Spa Massage Parlor  
6 Bass Medical - Winston Vaughan  
7 Beverly Ana Jones  
8 Carlos Guillermo Olaya Orozco  
9 China Roberson  
10 Danny Valencia  
11 Darice Decker  
12 El Gran Taco  
13 Empire Barber Studio  
14 Equitable Ocean Front LLC  
15 Equitable Ocean, Inc.  
16 Hannah Mattson  
17 Hari/Niranjan Shrestha  
18 Jackie Stromberg  
19 Jane Zimmerman  
20 Jim Walker  
21 Jose Martinez  
22 Jose Perez  
23 Ken Mattson  
24 Lucio Guerra  
25 Marc and Susan Piper  
26 Marc Lair  
27 Mark Nielsen  
28 Mayte Hernandez, Luis Pelayo  
Matthew Treger  
Mere Mautoga  
Perry Pownall  
Rachel Liles  
Ricardo, Maricela and Daughter  
Ricky Page  
Roberto/Tienda Iniquez  
Santos Castro  
Santos Perez Reyes, Viviana  
Sara Lopez  
Scott Nichols  
Sherri Perlovich  
Uriel Gonzalez  
US Post Office  
Wesley Edgar Boykin  
William and Linda Rice

1 Yolanda Rodriguez

2 **13. Bankruptcy Judges**

3 Chief Judge Stephen L. Johnson

4 Judge Hannah L. Blumenstiel

5 Judge M. Elaine Hammond

6 Judge William Lafferty

7 Judge Dennis Montali

8 Judge Charles Novack

9 **14. Bankruptcy Court Staff**

10 Ruby Bautista

11 Dina Kakalia

12 Ardie Ermac

13 Venice Tamplin-Henderson

14 Teresa Mkhitarian

15 Cindy Fan

16 **15. United States Trustee Staff**

17 Christina Goebelsmann

18 Mike Chow

19 Ianthe V. Del Rosario

20 Nychelle G. Rivera

21 Phillip Shine

22 Yung Nor Wong

23 Jared Day

24 Deanna Hazelton

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**Exhibit B**  
**Connections with Parties in Interest**

Dinsmore & Shohl represents Jim Walker, State Farm, JPMorgan Chase Bank, Bank of America, Bank of New York Mellon, U.S. Bank and MERS, all identified on Exhibit “A.” The representation provided by Dinsmore and Shohl to the aforementioned clients is unrelated to the bankruptcy case.

1 Richard L. Wynne (Bar No. 120349)  
2 richard.wynne@hoganlovells.com  
3 Erin N. Brady (Bar No. 215038)  
4 erin.brady@hoganlovells.com  
5 Edward J. McNeilly (Bar No. 314588)  
6 edward.mcneilly@hoganlovells.com  
7 HOGAN LOVELLS US LLP  
8 1999 Avenue of the Stars, Suite 1400  
9 Los Angeles, California 90067  
10 Telephone: (310) 785-4600  
11 Facsimile: (310) 785-4601

12 *Attorneys for Debtor and Debtor in Possession*

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

16 In re  
17 LEFEVER MATTSON, a California  
18 corporation, et al.  
19 Debtors.<sup>1</sup>

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

23 **RETENTION QUESTIONNAIRE**

24 In re  
25 KS MATTSON PARTNERS, LP,  
26 Debtor.

27 To be completed by Professionals engaged by KS Mattson Partners, as debtor and debtor in  
28 possession ("Debtor KSMP"), in the above-captioned chapter 11 case.

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

<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 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>.

1  
2 1. Name and address of professional: John A. Mayers, Esq. Dinsmore &  
3 Shohl LLP, 655 West Broadway, Suite 800, San Diego, CA 92101.

4 2. Date of retention: September 29, 2025.

5 3. Type of Services to be provided: Litigation, advice and consult.

6 4. Brief description of services to be provided: Expected to be litigation to  
7 confirm possession of real property.

8 5. Arrangements for compensation (hourly, contingent, etc.): Hourly.

9 (a) Average hourly rate (if applicable): \$550.00

10 (b) Estimated average monthly compensation based on prepetition retention (if  
11 company was employed prepetition): N/A.

12 6. Prepetition claims against the Debtor held by the company (if any):

13 Amount of claim: N/A.

14 Date claim arose: N/A.

15 Nature of claim: N/A.

16 7. Prepetition claims against the Debtor (if any) held individually by any  
17 member, associate, or employee of the company: N/A.

18 8. Disclose the nature and provide a brief description of any interest adverse to  
19 the Debtor or its estate for the matters on which the professional is to be employed: None  
20 known.

21 9. Name and title of individual completing this form: John A. Mayers.

22 Dated: November 5, 2025

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26  
27  
28  
  
John Mayers

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)  
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HOGAN LOVELLS US LLP  
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*Attorneys for Debtor and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
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In re  
LEFEVER MATTSON, a California  
corporation, et al.  
Debtors.<sup>1</sup>

In re  
KS MATTSON PARTNERS, LP,  
Debtor.

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

**DECLARATION AND DISCLOSURE  
STATEMENT OF MICHELLE V.  
ZYROMSKI ON BEHALF OF ZYROMSKI  
KONICEK LLP**

Date: TBD  
Time: TBD  
Place: United States Bankruptcy Court  
1300 Clay Street, Courtroom 215  
Oakland, CA 94612

<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 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>.



1 I, Michelle V. Zyromski, hereby declare as follows:

2 1. I am a partner at Zyromski Konicek LLP, located at 613 Fourth Street, Suite 203,  
3 Santa Rosa, CA 95404 (the "Firm").

4 2. Debtor KS Mattson Partners, LP ("Debtor KSMP") has requested that the Firm  
5 provide services related to real estate litigation matters in the northern California area, and the  
6 Firm has agreed to provide those services (the "Services").

7 3. The Services include, but are not limited to, the following:

8 a. Landlord/tenant disputes; and

9 b. Unlawful detainer disputes.

10 4. The Firm may have performed services in the past and may perform services in  
11 the future, in matters unrelated to this chapter 11 case, for persons that are parties in interest in  
12 Debtor KSMP's chapter 11 case. As part of its customary practices, the Firm is retained in cases,  
13 proceedings, and transactions involving many different parties, some of whom may be claimants  
14 of Debtor KSMP, or may represent or be other parties in interest in this chapter 11 case. The Firm  
15 does not perform services for any such person in connection with this chapter 11 case. In addition,  
16 the Firm does not have any relationship with any such person, such person's attorneys, or such  
17 person's accountants that would be adverse to Debtor KSMP or its estate with respect to the  
18 matters on which the Firm is to be retained.

19 5. Neither I, nor any principal of, or any professional employed by the Firm has  
20 agreed to share or will share any portion of the compensation to be received from Debtor KSMP  
21 with any other person other than principals or regular employees of the Firm.

22 6. The Firm received from Debtor KSMP a schedule of key parties in interest in this  
23 chapter 11 case, a copy of which is attached hereto as Exhibit A.

7. Except as otherwise disclosed on **Exhibit B** to this Declaration, neither I nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest materially adverse to Debtor KSMP or its estate with respect to the matters on which the Firm is to be retained.

8. As of the commencement of this chapter 11 case, Debtor KSMP owed the Firm \$0.00 in respect of prepetition services rendered to Debtor KSMP.

9. If at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 28, 2025

Michelle V. Zyromski  
Michelle V. Zyromski



**Exhibit A**

**Parties-in-Interest Reviewed for Current and Recent Former Relationships**

**1. Debtor KSMP**

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David Wenzel  
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11    Employment Development Department  
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13    Hampton Mortgage Group Inc.  
14    John Chang  
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17    MERS, Nominee for BOFI Federal Bank  
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31    Trustee, Gerald and Carol Shiffman Joint Trust  
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33    WE Alliance Secured Income Fund, LLC

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37     Mark Nielsen, Plaintiff  
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40     Jeanne Wondra, as Trustee for the James Hurley Trust, et al., Plaintiff  
41     Timothy Lefever, Plaintiff  
42     Tamara D. Migliozi, Plaintiff  
43     Andrew Tubley, Plaintiff



1 Benedetti Farms, Inc., Plaintiff  
2 Securities & Exchange Commission, Plaintiff

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5 A Spa Massage Parlor  
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10 Danny Valencia  
11 Darice Decker  
12 El Gran Taco  
13 Empire Barber Studio  
14 Equitable Ocean Front LLC  
15 Equitable Ocean, Inc.  
16 Hannah Mattson  
17 Hari/Niranjana Shrestha  
18 Jackie Stromberg  
19 Jane Zimmerman  
20 Jim Walker  
21 Jose Martinez  
22 Jose Perez  
23 Ken Mattson  
24 Lucio Guerra  
25 Marc and Susan Piper  
26 Marc Lair  
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Matthew Treger  
Mere Mauitoga  
Perry Pownall  
Rachel Liles  
Ricardo, Maricela and Daughter  
Ricky Page  
Roberto/Tienda Iniquez  
Santos Castro  
Santos Perez Reyes, Viviana  
Sara Lopez  
Scott Nichols  
Sherri Perlovich  
Uriel Gonzalez  
US Post Office  
Wesley Edgar Boykin  
William and Linda Rice

1 Yolanda Rodriguez

2 **13. Bankruptcy Judges**

3 Chief Judge Stephen L. Johnson  
4 Judge Hannah L. Blumenstiel  
5 Judge M. Elaine Hammond  
6 Judge William Lafferty  
7 Judge Dennis Montali  
8 Judge Charles Novack

9 **14. Bankruptcy Court Staff**

10 Ruby Bautista  
11 Dina Kakalia  
12 Ardie Ermac  
13 Venice Tamplin-Henderson  
14 Teresa Mkhitarian  
15 Cindy Fan

16 **15. United States Trustee Staff**

17 Christina Goebelsmann  
18 Mike Chow  
19 Ianthe V. Del Rosario  
20 Nychelle G. Rivera  
21 Phillip Shine  
22 Yung Nor Wong  
23 Jared Day  
24 Deanna Hazelton

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**Exhibit B**  
**Connections with Parties in Interest**



Richard L. Wynne (Bar No. 120349)  
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Erin N. Brady (Bar No. 215038)  
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*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.<sup>1</sup>

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

**RETENTION QUESTIONNAIRE**

In re  
KS MATTSON PARTNERS, LP,  
Debtor.

To be completed by Professionals engaged by KS Mattson Partners, as debtor and debtor in possession ("Debtor KSMP"), in the above-captioned chapter 11 case.

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

<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 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>.

1                   1.       Name and address of professional:  
2                   Michelle V. Zyromski, Zyromski Konicek LLP, 613 Fourth Street, Suite 203, Santa Rosa,  
3                   California 95404, (707) 542-1393 x 101.

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5                   2.       Date of retention: September 24, 2025.

6                   3.       Type of Services to be provided:  
7                   General counsel.

8                   4.       Brief description of services to be provided:  
9                   Litigation, unlawful detainer, lease contracts, and real estate expertise.

10                  5.       Arrangements for compensation (hourly, contingent, etc.):  
11                  Attorney's hourly rate for most work. Flat fee for certain types of notices. Flat fee for filing an  
12                  unlawful detainer complaint. Flat fee for filing unlawful detainer request for default and default  
13                  judgment papers.

14  
15                  (a)       Average hourly rate (if applicable): \$350.00 per hour.

16                  (b)       Estimated average monthly compensation based on prepetition retention (if  
17                               company was employed prepetition): Not applicable.

18                  6.       Prepetition claims against the Debtor held by the company (if any): None.

19                               Amount of claim: Not applicable.

20                               Date claim arose: Not applicable.

21                               Nature of claim: Not applicable.

22                  7.       Prepetition claims against the Debtor (if any) held individually by any  
23                               member, associate, or employee of the company: None.

24                               Name: Not applicable.

25                               Status: Not applicable.

26                               Amount of claim: Not applicable.

1 Date claim arose: Not applicable.

2 Nature of claim: Not applicable.

3 8. Disclose the nature and provide a brief description of any interest adverse to  
4 the Debtor or its estate for the matters on which the professional is to be employed:  
5

6 None.

7 9. Name and title of individual completing this form:

8 Michelle V. Zyromski, Partner, Zyromski Konicek LLP, 613 Fourth Street, Suite 203, Santa Rosa,  
9 California 95404, (707) 542-1393 x 101.

10  
11 Dated: November 6, 2025  
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14 Michelle V. Zyromski  
15 MICHELLE V. ZYROMSKI  
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