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7 Attorneys for Monley Hamlin, Inc.

8 UNITED STATES BANKRUPTCY COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SANTA ROSA DIVISION

11 In re

12 LEFEVER MATTSON, a California
 13 corporation, et al.,¹

14 Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

15 In re

16 KS MATTSON PARTNERS, LP,

17 Debtor.

Date: November 18, 2025

Time: 11:00 a.m.

Location: 1300 Clay Street, Courtroom 215
 Oakland, CA 94612

[In person or via Zoom]

Judge: Hon. Charles Novack

18 **MONLEY HAMLIN, INC.'s CONDITIONAL NON-OPPOSITION TO AMENDED JOINT**
 19 **MOTION OF DEBTORS AND OFFICIAL COMMITTEE OF UNSECURED CREDITORS**
 20 **FOR AN ORDER (I) APPROVING THE PLAN SUMMARY AND AMENDED**
 21 **DISCLOSURE STATEMENT; (II) SCHEDULING HEARING ON CONFIRMATION OF**
 22 **PLAN AND APPROVING THE FORM AND MANNER OF SERVICE OF THE HEARING**
 23 **NOTICE; (III) ESTABLISHING PROCEDURES FOR THE SOLICITATION AND**
TABULATION OF VOTES ON PLAN; (IV) ESTABLISHING PROCEDURES FOR THE
ESTIMATION OF INVESTOR CLAIMS SOLELY FOR VOTING PURPOSES; AND (V)
APPROVING RELATED MATTERS

24 ¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four
 25 digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's
 26 address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The
 27 address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus
 28 Heights, CA95621. 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 Party-in-interest and Secured Creditor, Monley Hamlin, Inc. (“MHI”), by and through its
2 undersigned counsel, hereby files this conditional non-opposition (the “Conditional Non-
3 Opposition”) to the Amended Disclosure Statement (the “Amended Disclosure Statement”) [ECF No.
4 2567] filed in support of the First Amended Joint Chapter 11 Plan of Liquidation (the “Amended
5 Plan”) [ECF No. 2561] proposed by the LeFever Mattson debtors and the KS Mattson LP debtors
6 (collectively, the “Debtors”) and the Official Committee of Unsecured Creditors (the “Committee”) and in support thereof, states as follows:

8 MHI has been informed based on representations made by counsel for the Committee (one of
9 the Plan proponents) that MHI is in “Class 2: Other Secured Claims”, and that MHI’s claim, a secured
10 claim, is unimpaired (the “Clarifications”).

11 WHEREFORE, MHI does not oppose the Amended Disclosure Statement provided that the
12 Clarifications are included in the Plan, in the Amended Disclosure Statement, and in any order
13 approving the same.

14 Dated: November 12, 2025

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

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16 By: /s/ Thomas Willoughby
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18 Attorneys for Monley Hamlin, Inc.
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12 UNITED STATES BANKRUPTCY COURT
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15 In re

16 LEFEVER MATTSON, a California
17 corporation, et al.,¹

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19 In re

20 KS MATTSON PARTNERS, LP,

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Oakland, CA 94612

[In person or via Zoom]

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22 **PROOF OF SERVICE**

23 I, Allison S Kieser, declare:

24 I am a resident of the State of California and over the age of eighteen years, and not a
25 party to the within action; my business address is 500 Capitol Mall, Suite 2250, Sacramento, CA
26 95814.

27 On November 12, 2025, I caused to be served true copies of the following document(s)

28 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, CA95621. 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>.

described as on the interested parties in this action as follows:

1. MONLEY HAMLIN, INC.'s CONDITIONAL NON-OPPOSITION TO AMENDED JOINT MOTION OF DEBTORS AND OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER (I) APPROVING THE PLAN SUMMARY AND AMENDED DISCLOSURE STATEMENT; (II) SCHEDULING HEARING ON CONFIRMATION OF PLAN AND APPROVING THE FORM AND MANNER OF SERVICE OF THE HEARING NOTICE; (III) ESTABLISHING PROCEDURES FOR THE SOLICITATION AND TABULATION OF VOTES ON PLAN; (IV) ESTABLISHING PROCEDURES FOR THE ESTIMATION OF INVESTOR CLAIMS SOLELY FOR VOTING PURPOSES; AND (V) APPROVING RELATED MATTERS

☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

See attached list of Courts Electronic Mail Notice List

☒ **BY MAIL** on the parties in this action by causing a true copy thereof to be placed in a sealed envelope with postage thereon fully prepaid in the designated area for outgoing mail, addressed as follows:

See attached Mailing List

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2025, at Sacramento, California.

/s/ Allison S Kieser
Allison S Kieser

Courts Electronic Mail Notice List

The following is the list of parties who are currently on the list to receive email notice/service for this case.

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