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 Investors*¹

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re:

LEFEVER MATTSON, a California
 corporation, et al.²

Debtors.

**JOINDER TO OPPOSITION OF CHASE
 1992 FAMILY TRUST TO AMENDED
 JOINT MOTION OF DEBTORS AND
 OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS FOR AN
 ORDER (I) APPROVING THE PLAN
 SUMMARY AND DISCLOSURE
 STATEMENT; (II) SCHEDULING
 HEARING ON CONFIRMATION OF**

¹ The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulos; Kay Poulos; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the "Tillman Opposing Investors").

² 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.

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) THE ESTIMATION OF INVESTOR
CLAIMS AND INTERESTS SOLELY
FOR VOTING PURPOSES; AND (V)
APPROVING RELATED MATTERS

In re:

KS MATTSON PARTNERS, LP,
Debtor.

Date: November 18, 2025

Time: 11:00 a.m.

Judge: Hon. Charles D. Novack

JOINDER OF TILLMAN OPPOSING INVESTORS

The Tillman Opposing Investors join in the Opposition of Chase 1992 Family Trust to Amended Joint Motion of Debtors and Official Committee of Unsecured Creditors for an Order (I) Approving the Plan Summary and 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; (vi) the Estimation of Investor Claims and Interests Solely for Voting Purposes; and (v) Approving Related Matters, Doc No. 2777.

PERRY, JOHNSON, ANDERSON,
MILLER & MOSKOWITZ, LLP

DATED: November 12, 2025

By: /s/ Isaac M. Gradman

Isaac M. Gradman
Michael E. Tracht
Alexander A. Wiegel

And

Michael C. Fallon
Michael C. Fallon, Jr.

*Attorneys for the Tillman Opposing
Investors*