

Tobias S. Keller (CA Bar No. 151445)
 David A. Taylor (CA Bar No. 247433)
 Thomas B. Rupp (CA Bar No. 278041)
 KELLER BENVENUTTI KIM LLP
 101 Montgomery Street, Suite 1950
 San Francisco, CA 94104
 Telephone: (415) 496-6723
 Facsimile: (650) 636-9251
 E-mail: tkeller@kbbkllp.com
 dtaylor@kbbkllp.com
 trupp@kbbkllp.com

*Counsel to the LFM Debtors and
 Debtors in Possession*

Debra I. Grassgreen (CA Bar No. 169978)
 John D. Fiero (CA Bar No. 136557)
 Jason H. Rosell (CA Bar No. 269126)
 Steven W. Golden (admitted *pro hac vice*)
 PACHULSKI STANG ZIEHL & JONES LLP
 One Sansome Street, Suite 3430
 San Francisco, CA 94104
 Telephone: (415) 263-7000
 Facsimile: (415) 263-7010
 E-mail: dgrassgreen@pszjlaw.com
 jfiero@pszjlaw.com
 jrosell@pszjlaw.com
 sgolden@pszjlaw.com

*Counsel to the Official Committee
 of Unsecured Creditors*

Richard L. Wynne (CA Bar No. 120349)
 Erin N. Brady (CA Bar No. 215038)
 Edward J. McNeilly (CA Bar No. 314588)
 HOGAN LOVELLS US LLP
 1999 Avenue of the Stars, Suite 1400
 Los Angeles, California 90067
 Telephone: (310) 785-4600
 Facsimile: (310) 785-4601
 Email: richard.wynne@hoganlovells.com
 erin.brady@hoganlovells.com
 edward.mcneilly@hoganlovells.com

*Counsel for Debtor and Debtor in Possession
 KS Mattson Partners, LP*

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

In re:

LEFEVER MATTSON, a California
 corporation, *et al.*¹

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

NOTICE OF CONTINUED HEARING ON:

**(A) AMENDED JOINT MOTION OF
 DEBTORS AND OFFICIAL COMMITTEE
 OF UNSECURED CREDITORS FOR AN
 ORDER (I) APPROVING THE PLAN**

¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.com>

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

In re

KS MATTSON PARTNERS, LP,

Debtor.

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

--AND--

**(B) JOINT MOTION FOR THE ENTRY
OF AN ORDER APPROVING
SETTLEMENT PROCEDURES WITH
RESPECT TO INVESTOR CLAIMS**

Date: December 3, 2025
Time: 11:00 a.m. (Pacific Time)
Place: **(In Person or Via Zoom)**
United States Bankruptcy Court
1300 Clay Street, Courtroom 215
Oakland, CA 94612
Judge: Honorable Charles Novack
Objection Deadline: November 12, 2025

**TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED
STATES TRUSTEE, AND ALL CREDITORS AND OTHER PARTIES IN INTEREST:**

PLEASE TAKE NOTICE that on August 6, September 12, and October 2, 2024, LeFever Mattson, a California corporation ("LeFever Mattson"), and 59 affiliated entities (together with LeFever Mattson, the "LFM Debtors")² each filed a voluntary petition for relief under chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that on November 22, 2024, KS Mattson Partners, LP ("KSMP") and, together with the LFM Debtors, the "Debtors") became subject to an involuntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2024, the Court entered the *Stipulated Order for Relief in an Involuntary Case* [KSMP Docket No. 131]. The above-captioned chapter 11 cases of the Debtors (the "Chapter 11 Cases") are being jointly administered for procedural purposes only.

² Another affiliated entity, Live Oak Investments, LP ("Live Oak"), filed a chapter 11 petition on September 12, 2024. Live Oak is not a Plan Proponent, and the above-captioned counsel does not represent Live Oak; however, the Plan provides for the substantive consolidation of Live Oak with the other Debtors and its creditors and investors will be entitled to vote on the Plan.

1 **PLEASE TAKE FURTHER NOTICE** that the United States Trustee appointed an
2 official committee of unsecured creditors (the “Committee,” and together with the Debtors, the
3 “Plan Proponents”) in the Chapter 11 Cases on October 9, 2024 [Docket No. 135], amended its
appointment on November 25, 2024 [Docket No. 368], and further amended its appointment on
August 26, 2025 [Docket No. 2104].

4 **PLEASE TAKE FURTHER NOTICE** that on October 15, 2025, the Plan Proponents
5 filed the *First Amended Joint Chapter 11 Plan of Liquidation* [Docket No. 2561] (the “Plan”); the
6 *Amended Disclosure Statement in Support of First Amended Joint Chapter 11 Plan of Liquidation*
[Docket No. 2567] (the “Disclosure Statement”); and the *Notice of Filing Joint Investigation*
Report and Summary of Global Settlement [Docket No. 2568] (the “Investigation Report”).

7 **PLEASE TAKE FURTHER NOTICE** that on October 15, 2025, the Plan Proponents
8 filed the *Amended Joint Motion of Debtors and Official Committee of Unsecured Creditors for an*
9 *Order (I) Approving the Plan Summary and Disclosure Statement; (II) Scheduling Hearing on*
10 *Confirmation of Plan and Approving the Form and Manner of Service of the Hearing Notice;*
11 *(III) Establishing Procedures for the Solicitation and Tabulation of Votes on Plan; (IV) The*
12 *Estimation of Investor Claims and Interests Solely for Voting Purposes; and (V) Approving Related*
13 *Matters* [Docket No. 2569] (the “Solicitation Procedures Motion”).³ Through the Solicitation
Procedures Motion, the Plan Proponents respectfully request the entry of an order that, among
other things, (i) approves the Plan Summary; (ii) approves the Disclosure Statement to permit the
Plan Proponents to distribute and solicit acceptances for the Plan, (iii) sets the date and time for
the Confirmation Hearing and approves certain related deadlines and the form of Confirmation
Hearing Notice, (iv) approves the Solicitation Procedures, (v) approves the Investor
Claims/Interests Estimation Procedures (for purposes of voting to accept or reject the Plan), and
(vi) grants related relief.

14 **PLEASE TAKE FURTHER NOTICE** that on September 17, 2025, the Plan Proponents
15 filed the *Joint Motion for the Entry of an Order Approving Settlement Procedures with Respect to*
16 *Investor Claims* [Docket No. 2365] (the “Investor Claims Settlement Motion”).⁴ Through the
Investor Claims Settlement Motion, the Plan Proponents respectfully request the entry of an order
approving settlement procedures with respect to the allowance of Investor Claims under the Plan.

17 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Solicitation Procedures
18 Motion and the Investor Claims Settlement Motion has been **continued** to **December 3, 2025 at**
19 **11:00 a.m. (Pacific Time)**, before the Honorable Charles Novack, United States Bankruptcy
Judge.

20 **PLEASE TAKE FURTHER NOTICE** that counsel, parties, and other interested parties
21 may attend in person in Courtroom 215 in Oakland, by Zoom video, or by Zoom telephone.
22 Additional information is available on Judge Novack’s Procedures page on the Bankruptcy Court’s
23 website, and information on how to attend the hearing by Zoom will be included with each calendar
24 posted under Judge Novack’s Calendar on the Bankruptcy Court’s website. If you have questions
25 about how to participate in a video or telephonic hearing, you may contact the court by calling
26 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website at
www.canb.uscourts.gov.

27 ³ Capitalized terms used but not defined in this paragraph shall have the meanings provided to them in the
Solicitation Procedures Motion.

28 ⁴ Capitalized terms used but not defined in this paragraph shall have the meanings provided to them in the Investor
Claims Settlement Motion.

1 **PLEASE TAKE FURTHER NOTICE** that copies of the Solicitation Procedures Motion,
2 the Plan, the Disclosure Statement, the Investigation Report, the Investor Claims Settlement
3 Motion, and their supporting documents can be obtained at no cost by contacting counsel for the
Committee at LMCommittee@pszjlaw.com or by visiting <https://www.veritaglobal.net/LM>.

4 Dated: November 17, 2025

KELLER BENVENUTTI KIM LLP

5 By: /s/ Thomas B. Rupp

Tobias S. Keller

6 David A. Taylor

7 Thomas B. Rupp

Counsel to the LFM Debtors

8
9 **PACHULSKI STANG ZIEHL & JONES LLP**

10 By: /s/ Jason H. Rosell

11 Debra Grassgreen

12 John D. Fiero

13 Jason H. Rosell

14 Steven W. Golden

Counsel to the Committee

15 **HOGAN LOVELLS US LLP**

16 By: /s/ Erin N. Brady

17 Richard L. Wynne

18 Erin N. Brady

19 Edward J. McNeilly

Counsel to Debtor KS Mattson Partners, LP