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# **UNITED STATES BANKRUPTCY COURT**

## **NORTHERN DISTRICT OF CALIFORNIA**

### **SANTA ROSA DIVISION**

In re

LEFEVER MATTSON,  
 a California corporation, *et al.*,<sup>1</sup>

Debtors.

Case No. 24-10545 CN (Lead Case)

(Jointly Administered)

Chapter 11

<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 In re

2  
3 KS MATTSON PARTNERS, LP,

4  
5 Debtor.

**MOTION OF THE COMMITTEE, LEFEVER  
MATTSON DEBTORS, AND DEBTOR KS  
MATTSON PARTNERS, LP FOR ENTRY OF  
AN ORDER ALLOWING OMNIBUS  
OBJECTIONS ON THE BASIS THAT CERTAIN  
CLAIMS AND INTERESTS ARE  
INCORRECTLY OR IMPROPERLY  
CLASSIFIED**

**Hearing Date:**

Date: December 10, 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

12  
13 LeFever Mattson, a California corporation, (“LFM”), its affiliated debtors and debtors in  
14 possession (collectively with LFM, the “LFM Debtors”), and KS Mattson Partners, LP (“KSMP” and  
15 together with the LFM Debtors, the “Debtors”), and the Official Committee of Unsecured Creditors (the  
16 “Committee” and together with the Debtors, the “Movants”),<sup>2</sup> hereby seek entry of an order (the  
17 “Order”),<sup>3</sup> pursuant to section 105(a) and 502(a) of Title 11 of the United States Code (the “Bankruptcy  
18 Code”) and rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), allowing  
19 the Movants to file omnibus objections to reclassify certain proofs of claim and proofs of interest filed  
20 against the Debtors on the grounds that such claims and interests are improperly or incorrectly classified  
21 as secured, priority, and/or administrative claims.

**JURISDICTION**

22  
23 The United States Bankruptcy Court for the Northern District of California (the “Court”) has  
24 jurisdiction over this Motion under 28 U.S.C. § 1334. This is a core proceeding within the meaning of  
25 28 U.S.C. § 157(b)(2). Venue of this proceeding is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

26  
27 <sup>2</sup> Debtor Live Oak Investments, LP is not a Movant.

28 <sup>3</sup> Substantially in the form attached hereto as Exhibit A.

## **BACKGROUND**

### **A. The Commencement of the Chapter 11 Cases**

On August 6, 2024, September 12, 2024, and October 2, 2024 (the “LFM Petition Dates”),<sup>4</sup> the LFM Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, commencing their jointly administered bankruptcy cases (the “LFM Chapter 11 Cases”).<sup>5</sup> On November 22, 2024 (the “KSMP Petition Date”), Debtor KSMP became subject to an involuntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2025, the Court entered the *Stipulated Order for Relief in an Involuntary Case* and subsequently appointed Robbin L. Itkin as the Responsible Individual in the KSMP chapter 11 case, effective as of June 16, 2025. The KSMP chapter 11 case is jointly administered, for procedural purposes only, with those of the LFM Debtors. *See* Docket No. 1887.

The Debtors continue to manage their properties and affairs as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Committee was appointed by the Office of the United States Trustee in the LFM Chapter 11 Cases on October 9, 2024, and in KSMP’s chapter 11 case on August 26, 2025. No trustee or examiner has been appointed in the Debtors’ Chapter 11 Cases.

### **B. Schedules and Bar Date Orders**

On November 15, 2024, the LFM Debtors filed their schedules of assets and liabilities, statements of financial affairs, and list of equity security holders [Docket Nos. 292-353], and on September 9, 2025, the LFM Debtors filed amended schedules of assets and liabilities and certain statements of financial affairs [Docket Nos. 2251-2291, 2293-2305] (collectively, the “LFM Schedules and Statements”).

On December 14, 2024, the Court entered its *Order (1) Establishing Bar Date; (2) Approving Form and Manner of Notice of Bar Date and Procedures With Respect Thereto; and (3) Approving*

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<sup>4</sup> LFM Debtor, Windscape Apartments, LLC filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code on August 6, 2024. LFM Debtors Pinewood Condominiums, LP and Ponderosa Pines, LP each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code on October 2, 2024. The other fifty-eight LFM Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code on September 12, 2024.

<sup>5</sup> LFM Debtor Windscape Apartments, LLC, filed its chapter 11 petition on August 6, 2024. LFM Debtors Pinewood Condominiums, LP, and Ponderosa Pines, LP, filed their chapter 11 petitions on October 2, 2024.

1 *Confidentiality Protocols* [Docket No. 459] (the “LFM Bar Date Order”). Pursuant to the LFM Bar Date  
2 Order, the Court established February 14, 2025 (the “LFM Bar Date”) as the last day for (a) all investors  
3 to file proofs of interest in the LFM Debtors arising before the LFM Petition Dates and (b) all creditors  
4 to file proofs of claim against the LFM Debtors arising before the LFM Petition Dates. The deadline for  
5 governmental units to file proofs of claim against the LFM Debtors arising before the LFM Petition  
6 Dates remained 180 days after the applicable LFM Petition Date.

7 On August 8, 2025, KSMP filed its schedules of assets and liabilities, statements of financial  
8 affairs, and list of equity security holders [Docket Nos. 1980-1982] (the “KSMP Schedules and  
9 Statements” and together with the LFM Schedules and Statements, the “Schedules and Statements”).

10 On August 28, 2025, the Bankruptcy Court entered its *Order Granting Motion for an Order (1)*  
11 *Establishing Bar Date; (2) Approving Form and Manner of Notice of Bar Date and Procedures With*  
12 *Respect Thereto; and (3) Approving Confidentiality Protocols* [Docket No. 2184] (the “KSMP Bar Date  
13 Order”). Pursuant to the KSMP Bar Date Order, the Bankruptcy Court established October 3, 2025 (the  
14 “KSMP Bar Date”) as the last day for all creditors (other than governmental units) to file proofs of claim  
15 against KSMP arising before the KSMP Petition Date, and established December 8, 2025 as the last day  
16 for governmental units to file proofs of claim against KSMP arising before the KSMP Petition Date.

### 17 **C. Claims Reconciliation Process**

18 According to the official register of claims and interest maintained by Kurtzman Carson  
19 Consultants, LLC dba Verita Global (“Verita”), as of the date hereof, over 1,900 proofs of claim (the  
20 “Proofs of Claim”) and 800 proofs of interest (the “Proofs of Interest”) have been filed against the  
21 Debtors in these Chapter 11 Cases. The LFM Bar Date and KSMP Bar Date have passed.

22 The Debtors, the Committee, and their respective advisors have commenced the claims  
23 reconciliation process and anticipate that the Debtors and/or the Committee will object to a significant  
24 number of Proofs of Claim and Proofs of Interest asserted against the Debtors in accordance with  
25 Bankruptcy Rule 3007(d), which authorizes objections to multiple Claims in an omnibus fashion based  
26 on certain enumerated grounds, and on additional grounds not set forth in Bankruptcy Rule 3007(d). It  
27 would be time-consuming and expensive for the Debtors or the Committee, as applicable, to prepare  
28

1 and file individual pleadings for each objection of a type not specifically set forth in Bankruptcy Rule  
2 3007(d). Authority to object to multiple Proofs of Claim and Proofs of Interest on an omnibus basis on  
3 grounds other than those specifically set forth in Bankruptcy Rule 3007(d) will ease the administrative  
4 and financial burden associated with the claims reconciliation process.

5 Specifically, at this time, the Debtors and the Committee intend to seek reclassification of certain  
6 Proofs of Claim and Proofs of Interest filed against the Debtors on the grounds that such claims and  
7 interests were improperly or incorrectly asserted as secured, priority, and/or administrative claims (the  
8 “Incorrect Classification Claims”). **The Debtors and the Committee are not, at this time, seeking**  
9 **authority to file omnibus objections to disallow and expunge any claim or interest asserted by any**  
10 **party.** Rather, the Debtors or the Committee intend to file objections to approximately 130 Incorrect  
11 Classification Claims to properly classify the asserted claims and interests and ensure the official claims  
12 registers reflect the proper classification of such asserted claims and interests.

#### 13 **BASIS FOR RELIEF REQUESTED**

14 Pursuant to section 502(a) of the Bankruptcy Code, a filed proof of claim is deemed allowed  
15 unless a party in interest objects to the filed proof of claim. Bankruptcy Rule 3001(f) states that “[a]  
16 proof of claim signed and filed in accordance with these rules is prima facie evidence of the claim’s  
17 validity and amount.” Under section 1111(a) of the Bankruptcy Code, scheduled claims and interests  
18 are treated as proofs of claim and proofs of interest. *See* 11 U.S.C. § 1111(a) (“A proof of claim or  
19 interest is deemed filed under section 501 of this title for any claim or interest that appears in the  
20 schedules . . . except a claim or interest that is scheduled as disputed, contingent, or unliquidated.”). As  
21 such, all claims or interests filed in the Chapter 11 Cases must be reviewed as part of the claims  
22 reconciliation process.

23 Bankruptcy Rule 3007 requires that an objection to a proof of claim be made in writing, and that  
24 the claimant be provided with not less than 30 days’ notice of the hearing to be held in respect of such  
25 objection. *See* Fed. R. Bankr. P. 3007(a). Bankruptcy Rule 3007(c) proscribes joining multiple  
26 objections into an omnibus claim objection, “[u]nless the court orders otherwise or (d) permits.”  
27 Bankruptcy Rule 3007(d), in turn, provides that:

[O]bjections to more than one claim may be joined in a single objection if:

- (1) all the claims were filed by the same entity; or
- (2) the objections are based solely on grounds that the claims should be disallowed, in whole or in part, because they:
  - (A) duplicate other claims;
  - (B) were filed in the wrong case;
  - (C) have been amended by later proofs of claim;
  - (D) were not timely filed;
  - (E) have been satisfied or released during the case in accordance with the Code, applicable rules, or a court order;
  - (F) were presented in a form that does not comply with applicable rules and the objection states that the objector is therefore unable to determine a claim's validity;
  - (G) are interests, not claims; or
  - (H) assert a priority in an amount that exceeds the maximum amount allowable under § 507.

Fed. R. Bankr. P. 3007(d).

In addition to the grounds enumerated in Bankruptcy Rule 3007(d) for filing omnibus objections to claims, Bankruptcy Rule 3007(c) affords the Court the discretion to authorize omnibus objections based upon grounds beyond those explicitly delineated by Bankruptcy Rule 3007(d). *See* Fed. R. Bankr. P. 3007(c) (“Unless the court orders otherwise or (d) permits, objections to more than one claim shall not be joined in a single objection.”). Furthermore, section 105(a) of the Bankruptcy Code provides that a bankruptcy court may “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].”

Although the Debtors and the Committee expect to object to several proofs of claim on the grounds enumerated in Bankruptcy Rule 3007(d), certain claims or interests may necessitate objections on additional grounds not expressly set forth therein, in particular (as relevant to this Motion) that the claims or interests, in whole or in part are incorrectly or improperly classified. To minimize the cost, confusion, and delay otherwise attendant to preparing and filing individual claim objections, the Debtors and the Committee seek to object, as contemplated by Bankruptcy Rule 3007(c), to certain claims and interests on the grounds that they are incorrectly or improperly classified on an omnibus basis.

Allowing objections to claims and interests on the grounds that the claims or interests are incorrectly or improperly classified in an omnibus format will promote the efficient and cost-effective

1 administration of the Debtors' estates. Specifically, the relief requested will save the time and expense  
2 of filing potentially hundreds of individual claim objections, some of which could be duplicative and  
3 confusing to creditors and investors. The relief requested will permit a well-organized, efficient, and  
4 cost effective process, and all parties in interest will benefit from a streamlined process that will result  
5 in fewer pleadings, fewer hearings, and greater efficiency.

6 Consistent with the terms of Bankruptcy Rule 3007(f), the Debtors and the Committee request  
7 that any order sustaining an omnibus objection based on the grounds that a claim or interest is improperly  
8 or incorrectly classified constitutes a final order with respect to the Proofs of Claim or Proofs of Interest  
9 referenced in such order as if an individual objection had been filed for each Proof of Claim or Proof of  
10 Interest.

11 **NOTICE**

12 The Movants will provide notice of this motion to: (a) the Office of the United States Trustee for  
13 the Northern District of California and (b) any party that has requested notice pursuant to Bankruptcy  
14 Rule 2002. The Movants submit that, in light of the nature of the relief requested, no other or further  
15 notice need be given.

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1 WHEREFORE, the Movants respectfully request that the Court enter the Order, substantially in  
2 the form attached hereto as **Exhibit A** granting the requested relief herein and any such other relief as  
3 the Court deems appropriate under the circumstances.

4 Dated: November 19, 2025

KELLER BENVENUTTI KIM LLP

5 By: /s/ Thomas B. Rupp

6 Tobias S. Keller

7 David A. Taylor

8 Thomas B. Rupp

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9 PACHULSKI STANG ZIEHL & JONES LLP

10 By: /s/ Brooke E. Wilson

11 Debra Grassgreen

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15 HOGAN LOVELLS US LLP

16 By: /s/ Edward J. McNeilly

17 Richard L. Wynne

18 Erin N. Brady

19 Edward J. McNeilly

*Counsel to KS Mattson Partners, LP*



# **EXHIBIT A**

## **Proposed Order**

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John D. Fiero (CA Bar No. 136557)  
Jason H. Rosell (CA Bar No. 269126)  
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Unsecured Creditors*

**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

**[PROPOSED] ORDER GRANTING  
MOTION OF THE COMMITTEE,  
LEFEVER MATTSON DEBTORS,  
AND DEBTOR KS MATTSON  
PARTNERS, LP FOR ENTRY OF AN  
ORDER ALLOWING OMNIBUS  
OBJECTIONS ON THE BASIS THAT  
CERTAIN CLAIMS AND INTERESTS  
ARE INCORRECTLY OR  
IMPROPERLY CLASSIFIED**

**Hearing Date:**

Date: December 10, 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

<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 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.net/LM>.

1           Upon consideration of the *Motion of the Committee, LeFever Mattson Debtors, and Debtor*  
2 *KS Mattson Partners, LP for Entry of an Order Allowing Omnibus Objections on the Basis that*  
3 *Certain Claims and Interests Are Incorrectly or Improperly Classified* (the “Motion”); and the Court  
4 having found that it has jurisdiction to consider the Motion and the relief requested in the Motion  
5 pursuant to 28 U.S.C. §§ 157 and 1334, and the Order Referring Bankruptcy Cases and Proceedings  
6 to Bankruptcy Judges; and the Court having found that venue is proper in this district pursuant to  
7 28 U.S.C. §§ 1408 and 1409; and the Court having found that this is a core proceeding pursuant to  
8 28 U.S.C. § 157(b); and good and sufficient cause having been shown;

9           **IT IS HEREBY ORDERED THAT:**

10           1.       The Motion is **GRANTED**.

11           2.       The LFM Debtors, KSMP, and the Committee are permitted to file omnibus  
12 objections to reclassify proofs of interest and proofs of claim filed against the Debtors on the  
13 grounds that such claims and interests are improperly or incorrectly classified as secured, priority,  
14 and/or administrative claims.

15           3.       Any order sustaining an omnibus objection based on the grounds that a claim or  
16 interest is improperly or incorrectly classified constitutes a final order with respect to the proofs of  
17 claim or proofs of interest referenced in such order as if an individual objection had been filed for  
18 each proof of claim or proof of interest.

19           4.       Any order sustaining an omnibus objection based on the grounds that a claim or  
20 interest is improperly or incorrectly classified is without prejudice to the rights of the Movants or  
21 any other party in interest to object to such claim or interest on any grounds whatsoever.

22           5.       The Bankruptcy Court retains jurisdiction with respect to all matters arising under or  
23 related to the interpretation or implementation of this Order.

24                   **\*\* END OF ORDER \*\***