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 KS Mattson Partners, LP*

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

In re
 LEFEVER MATTSON, a California
 corporation, et al.,
 Debtors.¹

In re
 KS MATTSON PARTNERS, LP,
 Debtor.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**CERTIFICATION OF NO OBJECTION
 REGARDING DEBTOR KSMP'S MOTION
 FOR ORDER FURTHER EXTENDING
 THE TIME TO FILE NOTICES OF
 REMOVAL OF RELATED PROCEEDINGS**

[RE: Dkt. No. 2825]

Date: December 3, 2025

Time: 11:00 a.m.

Place: (In Person or Via Zoom)

United States Bankruptcy Court
 1300 Clay Street, Courtroom 215
 Oakland, CA 94612

Response Deadline: November 26, 2025

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.net/LM>.



1 As of this date, the undersigned has not received an answer, objection, or other responsive
2 pleading to *Debtor KSMP's Motion for Order Further Extending the Time to File Notices of*
3 *Removal of Related Proceedings* [Dkt. No. 2825] (the "Second Removal Motion") and has
4 reviewed the Court's record and no answer, objection, or other responsive pleading to the Removal
5 Motion appear. Pursuant to the *Notice of Hearing on Debtor KSMP's Motion for Order Further*
6 *Extending the Time to File Notices of Removal of Related Proceedings* [Dkt. No. 2828] (the
7 "Second Removal Notice"), objections were to be filed and served no later than **November 26,**
8 **2025**, and no informal extension of time to object has been provided.

9 The Second Removal Motion and the Second Removal Notice were both served on
10 November 13, 2025. *See* Dkt. No. 2893. No oppositions or responses have been filed with the Court
11 or received by KS Mattson Partners, LP ("Debtor KSMP").

12 It is hereby respectfully requested that the Order uploaded concurrently herewith be entered
13 by the Court.

14 **DECLARATION OF NO RESPONSE RECEIVED**

15 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
16 that:

- 17 1. I am an attorney with the firm of Hogan Lovells US LLP, counsel for Debtor KSMP.
- 18 2. I certify that I have reviewed the Court's docket in Debtor KSMP's case and have
19 not received any response or opposition to the Further Removal Motion.
20

21 DATED: December 1, 2025

HOGAN LOVELLS US LLP

22 By: /s/ Edward J. McNeilly

23 EDWARD J. McNEILLY, ESQ.

24 *Attorneys for Debtor and Debtor in Possession*
25 *KS Mattson Partners, LP*
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