

Dane Exnowski, SBN 281996
 Fanny Wan, SBN 277606
 McCalla Raymer Leibert Pierce, LLP
 301 E. Ocean Blvd., Suite 1720
 Long Beach, CA 90802
 Telephone: 562-661-5060
 Fax: 562-983-5365
 BK.CA@mcalla.com

Attorneys for Defendant

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In Re Adversary No.: 25-01020

LeFever Mattson, a California Corporation, et al. Bankruptcy Case No. 24-40545
 Debtors. (Jointly Administered)

In Re Chapter 11

KS Mattson Partners, LP.

Debtor.

**NOTICE OF HEARING ON MOTION TO
 DISMISS COMPLAINT WITH PREJUDICE
 FOR FAILURE TO STATE A CLAIM UPON
 WHICH RELIEF CAN BE GRANTED;**

The Official Committee of Unsecured Creditors,
 Plaintiffs,

V

Deutsche Bank Trust Company Americas, as
 Trustee for Residential Accredit Loans, Inc.,
 Mortgage Asset-Backed Pass-Through Certificates,
 Series 2007-QO1,

Defendant.

Hearing Information:

Date: January 7, 2026

Time: 11:00 AM

Place: Courtroom 215
 1300 Clay Street
 Oakland, CA 94612

Honorable Charles Novack

**TO THE HONORABLE CHARLES NOVACK UNITED STATES BANKRUPTCY COURT
 JUDGE, THE PLAINTIFF, PLAINTIFF'S COUNSEL AND OTHER INTERESTED PARTIES:**

PLEASE TAKE NOTICE that defendant Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc., Mortgage Asst-Backet Pass-Through Certificates, Series 2007-QO1 ("Defendant") has filed a Motion to Dismiss the above-entitled and numbered adversary complaint with prejudice for failure to state a claim upon which relief can be granted. The Motion will be heard before



1 the Honorable Charles Novack on **January 7, 2026** at **11:00 AM** at **1300 Clay Street, Courtroom 215,**
2 **Oakland, California 94612.** Counsel, parties, and other interested parties may attend in person in
3 Courtroom 215 or by Zoom telephone. Additional information is available on Judge Novack's
4 procedures page on the court's website, and information on how to attend the hearing by Zoom will be
5 included with each calendar posted under Judge Novack's Calendar on the court's website.

6 The Motion seeks dismissal pursuant to Federal Rules of Civil Procedure 12(b)(6). Pursuant to
7 Local Bankruptcy Rule 7007-1(a) - this motion is being heard on twenty-eight (28) days notice and
8 opposition, if any, to the granting of the Motion shall be in writing and shall be served on counsel for
9 moving party at the address listed in the upper left-hand corner on the first page of this notice and filed
10 with the Clerk by the responding party not less than fourteen (14) calendar days preceding the noticed
11 date of hearing. If the Plaintiff or any other party in interest fails to appear at the hearing, either personally
12 or by counsel, the Court may grant the requested relief.

13 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court's website provides
14 information regarding how to arrange an appearance at a video or telephonic hearing. If you have
15 questions about how to participate in a video or telephone hearing, you may contact the court by calling
16 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website.

17
18 Dated: December 4, 2025

Respectfully Submitted,
McCalla Raymer Leibert Pierce, LLP

19
20 By: /s/ Fanny Wan
Fanny Wan
21 Attorney for Movant
22
23
24
25
26
27
28

NOTICE OF HEARING

Dane Exnowski, SBN 281996
Fanny Wan, SBN 277606
McCalla Raymer Leibert Pierce, LLP
301 E. Ocean Blvd., Suite 1720
Long Beach, CA 90802
Telephone: 562-661-5060
Fax: 562-983-5365
BK.CA@mcalla.com

Attorneys for Defendant

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In Re
LeFever Mattson, a California Corporation, et al.
Debtors.

Adversary No.: 25-01020

Bankruptcy Case No. 24-40545
(Jointly Administered)

In Re
KS Mattson Partners, LP.
Debtor.

Chapter 11

CERTIFICATE OF SERVICE

The Official Committee of Unsecured Creditors,
Plaintiffs,
V
Deutsche Bank Trust Company Americas, as
Trustee for Residential Accredit Loans, Inc.,
Mortgage Asset-Backed Pass-Through Certificates,
Series 2007-QO1,
Defendant.

I, FANNY WAN, declare:

1. I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding.
My business address is 301 E Ocean Blvd, Ste 1720, Long Beach, CA 90802.
2. On December 4, 2025, I caused to be served true and correct copies of the following documents described as:

1 **MOTION TO DISMISS COMPLAINT WITH PREJUDICE FOR FAILURE TO STATE A CLAIM**
2 **UPO NWHICH RELIEF CAN BE GRANTED**

3 **MEMORANDUM OF POINTS AND AUTHORIES IN SUPPORT THEREOF**

4 **EXHIBIT “1”**

5 **NOTICE OF HEARING ON MOTION TO DISMISS COMPLAINT WITH PREJUDICE FOR**
6 **FAILURE TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED**

7 via United States Mail first class postage prepaid on the following interested parties:

8 *Plaintiff:*

9 The Official Committee of Unsecured Creditors
10 One Sansome Street, 34th Fl
Suite 3430
San Francisco, CA 94104-4436

11 *Plaintiff's Counsel:*

12 John D. Fiero
13 Pachulski Stang Ziehl & Jones LLP
14 One Sansome Street
34th Floor, Suite 3430
San Francisco, CA 94104-4436

15
16 Dated: December 4, 2025

Respectfully Submitted,
McCalla Raymer Leibert Pierce, LLP

17
18 By: /s/ Fanny Wan
19 Fanny Wan
20 Attorney for Movant
21
22
23
24
25
26
27
28

COS