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The Relief Sought in the following order is DENIED.
Signed: December 4, 2025

Charles Novack
U.S. Bankruptcy Judge

Attorneys for Debtor and Debtor in Possession

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.

Case No. 24-10545 CN (Lead Case)
(Jointly Administered)
Chapter 11

**ORDER AUTHORIZING DEBTOR KSMP'S
APPLICATION FOR AN ORDER (I)
AUTHORIZING THE RETENTION AND
PAYMENT, AS OF AUGUST 22, 2025, OF
PROFESSIONALS UTILIZED BY DEBTOR
KSMP IN THE ORDINARY COURSE OF
BUSINESS AND (II) GRANTING RELATED
RELIEF**

Date: December 3, 2025
Time: 11:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court,
1300 Clay Street, Courtroom 215
Oakland, CA 94612

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 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 This Court has considered *Debtor KSMP's Application for an Order (I) Authorizing the Retention*
2 *and Payment, as Of August 22, 2025, of Professionals Utilized by Debtor KSMP in the Ordinary*
3 *Course of Business and (II) Granting Related Relief Debtor KSMP's Application for an Order (I)*
4 *Authorizing the Retention and Payment, as Of August 22, 2025, of Professionals Utilized by Debtor*
5 *KSMP in the Ordinary Course of Business and (II) Granting Related Relief* (the "Motion"). This
6 Court has found that (i) this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and
7 1334, (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409 and (iii) notice of the
8 Motion and the Hearing was sufficient under the circumstances. After due deliberation, this Court has
9 determined that the relief requested in the Motion is in the best interests of Debtor KSMP, its estate
10 and its creditors, and good and sufficient cause having been shown,

13 **IT IS HEREBY ORDERED THAT:**

- 14 1. The Motion is GRANTED as set forth herein.
- 15 2. Pursuant to sections 105(a), 327, 328 and 330 of the Bankruptcy Code and
16 Bankruptcy Rule 2014(a), to the extent deemed necessary or appropriate by Debtor KSMP, Debtor
17 KSMP is authorized to employ Ordinary Course Professionals in the ordinary course of Debtor
18 KSMP's business, effective as of August 22, 2025.
- 19 3. Debtor KSMP is hereby permitted to retain and pay each Ordinary Course
20 Professional, including but not limited to those identified on the Initial OCP List attached hereto
21 as **Exhibit 1**, without prior application to this Court, pursuant to the following OCP Procedures:
 - 22 (a) **Ordinary Course Professional Fee Caps:** During the pendency of this case:
23 (i) no Ordinary Course Professional listed on the Initial OCP List will be paid
24 more than ***\$15,000.00 per month, calculated on a rolling three-month***
25 ***average*** for services rendered to Debtor KSMP without obtaining approval
26 of a fee application as described below; and (ii) the ***aggregate amount paid***
27 ***to all Ordinary Course Professionals shall not exceed \$30,000.00 per***
28 ***month calculated on a rolling three-month average***; provided, however,
that Debtor KSMP reserves the right to petition the Court to increase the

1 aforementioned caps (the “Fee Caps”) if necessary under the circumstances.

2
3 (b) **Disclosure Requirements:** Each Ordinary Course Professional wishing to
4 be retained in this Chapter 11 Case shall file with the Court and serve via
5 electronic mail the ***Declaration and Questionnaire***, substantially in the
6 forms attached to the Proposed Order as **Exhibits 2 and 3**, which **discloses**
7 **(i) the type and description of the services to be provided, (ii)**
8 **arrangements for compensation, (iii) prepetition claims against Debtor**
9 **KSMP, and (iv) the nature of any interest adverse to Debtor KSMP.**
10 Service of the Declaration and Questionnaire shall be made on the following
11 parties (each, a “Notice Party” and collectively, the “Notice Parties”): (i) the
12 Office of the United States Trustee (the “U.S. Trustee”); (ii) Debtor KSMP;
13 (iii) counsel for Debtor KSMP; (iv) the Committee; (v) counsel for Debtor
14 KSMP; (vi) Serene Investment Management, LLC, as DIP Lender; and (vii)
15 those persons who have formally appeared in this Chapter 11 Case.

16
17 (c) **Objection Process:** The Notice Parties shall have ***14 days after an Ordinary***
18 ***Course Professional’s filing of its completed Declaration and***
19 ***Questionnaire*** (the “Objection Deadline”) to object to the retention of the
20 Ordinary Course Professional. Objections, if any, shall be filed with the
21 Court and served upon the Notice Parties and the respective Ordinary Course
22 Professional on or before the Objection Deadline. If no objections are timely
23 filed (or if any objection is resolved as described below), the Ordinary Course
24 Professional will be ***deemed approved without further order of the Court.***
25 If an objection cannot be resolved and withdrawn within 10 days after
26 service, the matter will be ***scheduled for hearing*** before the Court.

27 (d) **Procedures for Supplementing the Initial OCP List:**

28 Should Debtor KSMP elect to supplement the list of Ordinary Course
Professionals to add additional Ordinary Course Professionals, Debtor
KSMP shall ***file a supplemental list with this Court*** describing the additional
Ordinary Course Professionals (the “Supplement”) and shall ***serve the***
Supplement on the Notice Parties.

Any additional Ordinary Course Professionals shall file and serve a
completed Declaration and Questionnaire on the Notice Parties. The Notice
Parties shall be required to object to any newly added Ordinary Course
Professional no later than ***14 days after the filing of the Declaration and***
Questionnaire prepared by such newly proposed Ordinary Course
Professional (the “Additional OCP Objection Deadline”).

If no objection is timely filed, the additional Ordinary Course Professional
will be ***deemed approved without further order of the Court.*** Objections, if
any, shall be filed with the Court and served upon the Notice Parties and the
respective additional Ordinary Course Professional by the Additional OCP
Objection Deadline. If an objection ***cannot be resolved and withdrawn***

1 *within 10 days after service, the matter will be scheduled for hearing* before
2 the Court.

- 3 (e) **Payments Procedures:** No Ordinary Course Professional may be paid any
4 amount for invoiced fees and expenses ***unless and until*** the Ordinary Course
5 Professional has been retained in accordance with these procedures.

6 Each Ordinary Course Professional may submit periodic invoices to Debtor
7 KSMP in the ordinary course of business. Such invoices must set forth in
8 reasonable detail the nature of the services rendered and disbursements
9 actually incurred by such professional. Provided that the Ordinary Course
10 Professional's invoiced fees and disbursements ***stay within the Fee Caps*** set
11 forth above and are otherwise acceptable to Debtor KSMP in its reasonable
12 business judgment, Debtor KSMP may pay each approved Ordinary Course
13 Professional, without a prior application to the Court, ***100% of the fees and***
14 ***disbursements incurred*** by the Ordinary Course Professional in the ordinary
15 course of business.

16 In the event that an Ordinary Course Professional seeks payment of an
17 amount that would exceed the Fee Cap (either as to the professional
18 individually or as to the overall Ordinary Professional fee cap), such
19 professional will be required to file a fee application for the full amount of
20 its fees and expenses in accordance with sections 330 and 331 of the
21 Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of the
22 Court applicable to chapter 11 professionals retained under section 327 of
23 the Bankruptcy Code, and any applicable guidelines, unless the U.S. Trustee
24 and Committee agree otherwise.

- 25 (f) **Periodic Reporting Requirements:** Within ***thirty (30) days after the end of***
26 ***each quarterly period***, Debtor KSMP will ***file a statement with the Court***
27 ***and serve the same on the Notice Parties***, certifying Debtor KSMP's
28 compliance with the terms of the relief requested herein. The statement shall
include for each Ordinary Course Professional: (a) the name of such Ordinary
Course Professional; (b) the amount paid as compensation for services
rendered and reimbursement of expenses incurred by each Ordinary Course
Professional during the previous quarter; (c) a general description of the
services rendered by each Ordinary Course Professional during the previous
quarter; and (d) the total amount paid post-petition to each Ordinary Course
Professional. Debtor KSMP will continue to file such statements through the
earlier of dismissal or conversion of the instant chapter 11 case or the
confirmation of a chapter 11 plan.

- (g) **Final Reporting Requirements:** Debtor KSMP shall file with the Court a
final statement within the time established for professionals to file their
final fee applications (the "Final Statement") and such statement shall
include the following information: (a) the aggregate amount paid to each
Ordinary Course Professional during the previous 90 days; (b) a general
description of the services rendered by each Ordinary Course Professional

1 during such period; and (c) the total amount paid post-petition to each
2 Ordinary Course Professional.

3 4. The *nunc pro tunc* relief set forth in paragraph 2, above, shall not apply to any
4 Ordinary Course Professional listed for the first time in a Supplement.

5 5. Notwithstanding any of the foregoing, Debtor KSMP shall separately file an
6 application to retain any Ordinary Course Professional that becomes materially involved in the
7 administration of this Chapter 11 Case pursuant to section 327 of the Bankruptcy Code.
8

9 6. Entry of this Order and approval of the OCP Procedures does not affect Debtor
10 KSMP's right to dispute any invoice submitted by an Ordinary Course Professional.

11 7. Debtor KSMP is hereby authorized to take such actions and to execute such
12 documents as may be necessary to implement the relief granted by this Order.

13 8. This Court shall retain jurisdiction to hear and determine all matters arising from
14 or related to the interpretation, implementation and/or enforcement of this Order.
15

16 ** END OF ORDER **
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Exhibit 1

Initial List of Ordinary Course Professionals

| Name | Address | Professional Service | Estimated Amount |
|-------------------------|---|--|--|
| Dinsmore & Shohl LLP | 655 West Broadway, Suite 800 San Diego, CA 92101 | Real Estate Litigation Counsel (San Diego) | \$15,000.00 per month, calculated on a rolling three- month average |
| Zyromski Konicek LLP | 613 Fourth Street, Suite 203 Santa Rosa, CA 95404 | Real Estate Litigation Counsel (Northern California) | \$5,000.00 per month, calculated on a rolling three- month average |

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EXHIBIT 2
Ordinary Course Professionals Declaration

1 Richard L. Wynne (Bar No. 120349)
2 richard.wynne@hoganlovells.com
3 Erin N. Brady (Bar No. 215038)
4 erin.brady@hoganlovells.com
5 Edward J. McNeilly (Bar No. 314588)
6 edward.mcneilly@hoganlovells.com
7 HOGAN LOVELLS US LLP
8 1999 Avenue of the Stars, Suite 1400
9 Los Angeles, California 90067
10 Telephone: (310) 785-4600
11 Facsimile: (310) 785-4601

12 *Attorneys for Debtor and Debtor in Possession*

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

16 In re
17 LEFEVER MATTSON, a California
18 corporation, et al.
19 Debtors.⁵

20 Case No. 24-10545 CN (Lead Case)
21 (Jointly Administered)
22 Chapter 11

23 In re
24 KS MATTSON PARTNERS, LP,
25 Debtor.

26 **DECLARATION AND DISCLOSURE**
27 **STATEMENT OF _____ ON**
28 **BEHALF OF _____**

29 _____
30 ⁵ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the
31 tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is
32 c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever
33 Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621. Due to the large
34 number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of
35 their federal tax identification numbers is not provided herein. A complete list of such information may be
36 obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>.

1 To be completed by Professionals engaged by KS Mattson Partners, as debtor and debtor in
2 possession ("Debtor KSMP"), in the above-captioned chapter 11 case.

3 I, _____, hereby declare as follows:

4 1. I am a _____ at _____, located at
5 _____ (the "Firm").

6
7 2. Debtor KSMP has requested that the Firm provide services related to
8 _____, and the Firm has agreed to provide those
9 services (the "Services").

10 3. The Services include, but are not limited to, the following:
11 _____
12 _____
13 _____

14 4. The Firm may have performed services in the past and may perform services in the
15 future, in matters unrelated to this chapter 11 case, for persons that are parties in interest in the KSMP
16 Debtor's chapter 11 case. As part of its customary practices, the Firm is retained in cases, proceedings,
17 and transactions involving many different parties, some of whom may be claimants of Debtor KSMP,
18 or may represent or be other parties in interest in this chapter 11 case. The Firm does not perform
19 services for any such person in connection with this chapter 11 case. In addition, the Firm does not
20 have any relationship with any such person, such person's attorneys, or such person's accountants
21 that would be adverse to the Debtor or its estate with respect to the matters on which the Firm is to
22 be retained.
23

24 5. Neither I, nor any principal of, or any professional employed by the Firm has agreed
25 to share or will share any portion of the compensation to be received from Debtor KSMP with any
26 other person other than principals or regular employees of the Firm.
27
28

1 6. The Firm received from the Debtor a schedule of key parties in interest in this Chapter
2 11 Case, a copy of which is attached hereto as Exhibit A.

3 7. Except as otherwise disclosed on Exhibit B to this Declaration, neither I nor any
4 principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or
5 represents any interest materially adverse to the Debtor or its estate with respect to the matters on
6 which the Firm is to be retained.

8 8. As of the commencement of this chapter 11 case, the Debtor owed the Firm
9 \$_____ in respect of prepetition services rendered to the Debtor

10 9. If at any time during the period of its employment, if the Firm should discover any
11 facts bearing on the matters described herein, the Firm will supplement the information contained in
12 this Declaration.

13 Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United
14 States of America that the foregoing is true and correct, and that this Declaration and Disclosure
15 Statement was executed on _____, 2025, at _____.

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19 _____
20 Declarant Name
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Exhibit A to Declaration

Parties-in-Interest Reviewed for Current and Recent Former Relationships

1. Debtor KSMP

K.S. Mattson Partners, LP

2. Lefever Mattson Debtors

Apan Partners, LLC

Autumn Wood I, LP

Bay Tree, LP

Beach Pine, LP

Bishop Pine, LP

Black Walnut, LP

Buck Avenue Apartments, LP

Buckeye Tree, LP

Bur Oak, LP

Butcher Road Partners, LLC

California Investment Properties, a California corporation

Cambria Pine, LP

Chestnut Oak, LP

Country Oaks I, LP

Divi Divi Tree, L.P.

Douglas Fir Investments, LP

Firetree I, LP

Firetree II, LP

Firetree III, LP

Foxtail Pine, LP

Ginko Tree, LP

Golden Tree, LP

Hagar Properties, LP

Heacock Park Apartments, LP

Home Tax Service of America, Inc. dba LeFever Mattson Property Management

LeFever Mattson I, LLC

LeFever Mattson, a California corporation

Live Oak Investments, LP

Monterey Pine, LP

Napa Elm, LP

Nut Pine, LP

Pinecone, LP

Pinewood Condominiums, LP

Ponderosa Pines, LP

Red Cedar Tree, LP

Red Mulberry Tree, LP

Red Oak Tree, LP

1 Red Oak, LP
2 Red Spruce Tree, LP
3 Redbud Tree, LP
4 River Birch, LP
5 River Tree Partners, LP
6 River View Shopping Center 1, LLC
7 River View Shopping Center 2, LLC
8 RT Capitol Mall, LP
9 RT Golden Hills, LP
10 Scotch Pine, LP
11 Sequoia Investment Properties, LP
12 Sienna Pointe, LLC
13 Spruce Pine, LP
14 Tradewinds Apartments, LP
15 Vaca Villa Apartments, LP
16 Valley Oak Investments, LP
17 Watertree I, LP
18 Willow Oak, LP
19 Windscape Apartments I, LP
20 Windscape Apartments II, LP
21 Windscape Apartments, LLC
22 Windscape Holdings, LLC
23 Windtree, LP
24 Yellow Poplar, LP

25 **3. Lefever Mattson Non-Debtor Affiliate/Subsidiary Companies**

26 Harrow Cellars, a California corporation
27 Pineapple Bear, a California corporation

28 **4. Non-Debtor Affiliate/Subsidiary Companies**

Perris Freeway Partners, LP
Specialty Property Partners, LP
Treehouse Investments, LP

5. Debtor's Professionals

Hogan Lovells US LLP
Stapleton Group, a part of J.S. Held
Robbin L. Itkin

6. Insiders

Kenneth Mattson
Stacy Mattson
K S Mattson Company, LLC

1 **7. Committee Members**

2 Charles Edgar
3 Hayes 2004 Family Trust
4 Lull Family Living Revocable Trust
5 Manfred K. Fischer Trust
6 Mullin Family Trust
7 The Anderson 2001 Revocable Trust
8 Umbriac & Tubley Family Trust
9 Walter Schenk

10 **8. Committee Professionals**

11 PwC
12 Pachulski, Stang, Ziehl & Jones, LLP

13 **9. Unsecured Creditors**

14 Andrew Viesca
15 Ariana Vierya
16 Auditor-Controller's Agency Alameda County
17 Auditor-Controller Treasurer-Tax Collector Department Santa Rosa
18 Bass Medical
19 Beverly Ann Jones
20 Brad Driver, by and through the personal representative and administrator of his estate, Mariah
21 Driver
22 Carlos Guillermo and Olaya Orozco
23 Central Valley Regional Water Board
24 Charlene Hultman
25 China Roberson
26 Citrus Heights - Water
27 City Of Del Mar - Water
28 City Of Sonoma – Water
29 Danny Valencia
30 Darice Decker
31 David Wenzel
32 Department of Treasury Internal Revenue Service
33 EDCO
34 Fennemore Wendel
35 Fidelity National Title Insurance Company
36 Franchise Tax Board
37 Jane Zimmerman
38 Y. Tito Sasaki and Janey L. Sasaki Trust
39 Jeremy Bussey
40 Jim Walker
41 Joan Muriel Pacheco
42 John Jeffers Trust
43 Jose Manuel

1 Jose Martinez
2 Kenneth George Dow, AKA Ken Dow Trust
3 Lefever Mattson
4 Lucio Garcia
5 Marc and Susan Piper
6 Marc Lair
7 Mark D and Jacque L Winger
8 Mark Nielsen
9 Marsha Copeland
10 Mary Lou Martin
11 Mayte Hernandez and Luis Pelayo
12 McPhail Fuel Company
13 Pacific Gas and Electric
14 Pauline Louise Dow, AKA Pauline Dow Trust
15 Perry Pownall
16 Phillip Hoang – Postmaster
17 Plaintiffs in Claridget et al. Litigation
18 Plaintiffs in Lefever v. Mattson Litigation
19 Plaintiffs in Tubley et al. Litigation
20 Plaintiffs in Wondra et al. Litigation
21 Rajeswori Shrestha
22 Recology
23 Santos Castro
24 Sara Lopez
25 Scott Nichols
26 Securities & Exchange Commission, SEC v. Mattson, et al.
27 Sherri Perlovich
28 Sonoma Garbage Collectors
Stapleton Group
State Farm
Tax Collector, Solano County
Tina M. Stott, as an individual and trustee to the Tina M. Stott family trust dated 3/17/2017
Tamara Miglioizzi v. Mattson et al.
Trustees, Eandi Living Trust
Trustees, Luis Martinez and Elizabeth Martinez Living Trust
Uriel Gonzalez
VOM Water District
Warren and Hope Elliott
Wesley Edgar Boykin
William and Linda Rice
Windtree, LP

10. Secured Creditors

Axos Bank
Bank of America NA
Bank of New York, Trustee, on behalf the Alternative Loan Trust 2007
Bank of New York Mellon

1 Citadel Environmental Services, Inc.
2 Company, Trustee for Residential Accredited Loans
3 Dept of Child Support Services
4 Deutsche Bank Trust Company
5 Employment Development Department
6 Flagstar Bank
7 Hampton Mortgage Group Inc.
8 John Chang
9 JPMorgan Chase Bank, N.A.
10 LAFM Loan Owners, LLC
11 MERS, Nominee for BOFI Federal Bank
12 ReProp Financial Mortgage Investors, LLC
13 Robert Bass LLC
14 Socotra
15 Socotra - for HFS Fund IV, LLC
16 Socotra Capital Inc.
17 Socotra Opportunity Fund, LLC
18 Socotra Opportunity REIT I LLC
19 Socotra REIT I LLC
20 Sonoma County Tax Collector
21 Sonoma Ranch Homeowners Association
22 Sylva Family Properties
23 The Mercato Association
24 Trustee of the John and Mary Metallinos Living Trust
25 Trustee, Gerald and Carol Shiffman Joint Trust
26 US Bank NA
27 WE Alliance Secured Income Fund, LLC

17 **11. Litigation Claims**

18 Brad Driver, by and through the Personal Representative and Administrator of His Estate, Mariah
19 Driver, Plaintiff
20 Mark Nielsen, Plaintiff
21 Tina M. Stott, as an Individual and Trustee to the Tina M. Stott Family Trust Dated 3/17/2017,
22 Plaintiff
23 Jeanne Wondra, as Trustee for the James Hurley Trust, et al., Plaintiff
24 Timothy Lefever, Plaintiff
25 Tamara D. Migliozi, Plaintiff
26 Andrew Tubley, Plaintiff
27 Benedetti Farms, Inc., Plaintiff
28 Securities & Exchange Commission, Plaintiff

25 **12. Tenants / Persons in Occupation of KSMP Properties**

26 Ariana Vierya
27 A Spa Massage Parlor
28 Bass Medical - Winston Vaughan
Beverly Ana Jones

1 Carlos Guillermo Olaya Orozco
China Roberson
2 Danny Valencia
3 Darice Decker
El Gran Taco
4 Empire Barber Studio
Equitable Ocean Front LLC
5 Equitable Ocean, Inc.
Hannah Mattson
6 Hari/Niranjan Shrestha
7 Jackie Stromberg
Jane Zimmerman
8 Jim Walker
Jose Martinez
9 Jose Perez
Ken Mattson
10 Lucio Guerra
11 Marc and Susan Piper
Marc Lair
12 Mark Nielsen
Mayte Hernandez, Luis Pelayo
13 Matthew Treger
14 Mere Mauitoga
Perry Pownall
15 Rachel Liles
Ricardo, Maricela and Daughter
16 Ricky Page
Roberto/Tienda Iniquez
17 Santos Castro
Santos Perez Reyes, Viviana
18 Sara Lopez
19 Scott Nichols
Sherri Perlovich
20 Uriel Gonzalez
US Post Office
21 Wesley Edgar Boykin
22 William and Linda Rice
Yolanda Rodriguez

23 **13. Bankruptcy Judges**

24 Chief Judge Stephen L. Johnson
25 Judge Hannah L. Blumenstiel
26 Judge M. Elaine Hammond
Judge William Lafferty
27 Judge Dennis Montali
28 Judge Charles Novack

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14. Bankruptcy Court Staff

Ruby Bautista
Dina Kakalia
Ardie Ermac
Venice Tamplin-Henderson
Teresa Mkhitarian
Cindy Fan

15. United States Trustee Staff

Christina Goebelsmann
Mike Chow
Ianthe V. Del Rosario
Nychelle G. Rivera
Phillip Shine
Yung Nor Wong
Jared Day
Deanna Hazelton

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Exhibit B to Declaration
Connections with Parties in Interest

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Exhibit 3
Retention Questionnaire

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

Attorneys for Debtor and Debtor in Possession

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

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

Debtors.¹

Case No. 24-10545 CN (Lead Case)
(Jointly Administered)
Chapter 11

RETENTION QUESTIONNAIRE

In re
KS MATTSON PARTNERS, LP,
Debtor.

To be completed by Professionals engaged by KS Mattson Partners, as debtor and debtor in possession (“Debtor KSMP”), in the above-captioned chapter 11 case.

All questions **must** be answered. Please use “none,” “not applicable,” or “N/A,” as appropriate. If more space is needed, please complete on a separate page and attach.

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 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>.

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1. Name and address of professional:

2. Date of retention: _____

3. Type of Services to be provided:

4. Brief description of services to be provided:

5. Arrangements for compensation (hourly, contingent, etc.):

(a) Average hourly rate (if applicable): _____

(b) Estimated average monthly compensation based on prepetition retention (if company was employed prepetition): _____

6. Prepetition claims against the Debtor held by the company (if any):

Amount of claim: \$ _____

Date claim arose: _____

Nature of claim: _____

7. Prepetition claims against the Debtor (if any) held individually by any member, associate, or employee of the company:

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Name: _____

Status: _____

Amount of claim: \$ _____

Date claim arose: _____

Nature of claim: _____

8. Disclose the nature and provide a brief description of any interest adverse to the Debtor or its estate for the matters on which the professional is to be employed:

9. Name and title of individual completing this form:

Dated: _____, 2025

Declarant Name

COURT SERVICE LIST

ECF Parties

Mail service will be handled by counsel.