

KELLER BENVENUTTI KIM LLP
 101 MONTGOMERY STREET, STE. 1950
 SAN FRANCISCO, CALIFORNIA 94104

KELLER BENVENUTTI KIM LLP
 TOBIAS S. KELLER (Cal. Bar No. 151445)
 (tkeller@kbbkllp.com)
 DAVID A. TAYLOR (Cal. Bar No. 247433)
 (dtaylor@kbbkllp.com)
 THOMAS B. RUPP (Cal. Bar No. 278041)
 (trupp@kbbkllp.com)
 101 Montgomery Street, Suite 1950
 San Francisco, California 94104
 Telephone: (415) 496-6723
 Facsimile: (650) 636-9251

*Attorneys for the Debtors and
 Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re:

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

Debtors.

In re:

KS MATTSON PARTNERS, LP,

Debtor.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**STIPULATION TO FURTHER
 CONTINUE HEARING ON CITIZENS
 BUSINESS BANK'S SECOND MOTION
 FOR RELIEF FROM THE AUTOMATIC
 STAY [REAL PROPERTY: 103 and 105
 Commerce Court, Fairfield, California
 94534]**

Hearing Date: November 7, 2025

Time: 10:00 a.m.

Place: 1300 Clay Street, Room 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 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://veritaglot>

Citizens Business Bank (“Bank”), Nut Pine, LP, and Golden Tree, LP (jointly, the “Debtors” and together with Bank, collectively, the “Parties”), by and through their undersigned counsel, submit this stipulation regarding the hearing scheduled on November 7, 2025, at 10:00 a.m., to consider Bank’s *Second Motion for Relief from the Automatic Stay [Real Property: 103 and 105 Commerce Court, Fairfield, California 94534]* [Dkt. No. 1686] (the “Motion”);²

WHEREAS, the Parties are discussing a resolution to pay the Bank in full;

WHEREAS, the Parties agree and stipulate that the hearing to consider the Motion should be continued to a later date and time to provide further time to discuss and potentially reach a resolution;

THEREFORE, the Parties stipulate that, upon entry of an order approving this stipulation by the Court, the hearing on the Motion shall be continued to January 16, 2026, at 10:00 a.m.

IT IS SO STIPULATED.

December 5, 2025

KELLER BENVENUTTI KIM LLP

By: /s/ Gabrielle L. Albert
Gabrielle L. Albert
Attorneys for the Debtors and Debtors in Possession

HEMAR, ROUSSO & HEAD LLP

By: /s/ Jessica M. Simon
Jessica M. Simon
Attorneys for Citizens Business Bank

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.