

**KELLER BENVENUTTI KIM LLP**  
 101 MONTGOMERY STREET, SUITE 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.*,<sup>1</sup>  
 Debtors.

In re

KS MATTSON PARTNERS, LP,  
 Debtor.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**NOTICE OF HEARING ON OBJECTION TO  
 CLAIMS OF SIROOS SAIFI (PROOF OF  
 CLAIM NO. 68)**

**Date:** February 11, 2026

**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

**Response Deadline: January 28, 2026**

<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 **TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED**  
2 **STATES TRUSTEE, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,**  
3 **THE AFFECTED CLAIMANT, AND OTHER PARTIES IN INTEREST:**

4 **PLEASE TAKE NOTICE** that on August 6, 2024, Windscape Apartments, LLC filed a  
5 voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy  
6 Code”) in the United States Bankruptcy Court for the Northern District of California (Santa Rosa  
7 Division) (the “Bankruptcy Court”).

8 **PLEASE TAKE FURTHER NOTICE** that on September 12, 2024, LeFever Mattson, a  
9 California corporation (“LeFever Mattson”), and 57 affiliated entities (the “September 12  
10 Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

11 **PLEASE TAKE FURTHER NOTICE** that on October 2, 2024, Pinewood  
12 Condominiums, LP and Ponderosa Pines, LP, both affiliates of LeFever Mattson, filed voluntary  
13 petitions for relief under chapter 11 of the Bankruptcy Code (the “October 2 Debtors,” and  
14 collectively with Windscape Apartments, LLC and the September 12 Debtors, the “Debtors”).<sup>2</sup>  
15 The bankruptcy cases of the Debtors are being jointly administered for procedural purposes only  
16 (the “Chapter 11 Cases”).

17 **PLEASE TAKE FURTHER NOTICE** that on December 9, 2025, the Debtors filed the  
18 *Objection to Claims of Siroos Saifi (Proof of Claim No. 68)* (the “Objection”). By the Objection,  
19 the Debtors seek to disallow and expunge Proof of Claim No. 68 (the “Claim”), filed by Siroos  
20 Saifi (the “Claimant”), in its entirety. In deciding the Objection, the Court may consider any other  
21 document filed in these Chapter 11 Cases.

22 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Objection has been set for  
23 **February 11, 2026, at 11:00 a.m. (Pacific Time)** (the “Hearing”), before the Honorable Charles  
24 Novack, United States Bankruptcy Judge.

25 **PLEASE TAKE FURTHER NOTICE** that if the Claimant opposes the disallowance of  
26 the Claim referenced above, then pursuant to Bankruptcy Local Rule 9014-1(c)(1), any response  
27 (the “Response”) to the Objection must be filed with the Bankruptcy Court and served on counsel  
28 for the Debtors no later than **January 28, 2026**.

**PLEASE TAKE FURTHER NOTICE** that, if factual disputes are presented by the  
Objection and any timely Response thereto, the Hearing will proceed as a status conference; factual  
disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at  
the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the  
Hearing. See Bankruptcy Local Rule 3007-1(b).

**PLEASE TAKE FURTHER NOTICE** that counsel, parties, and other interested parties  
may attend in person in Courtroom 215 in Oakland, by Zoom video, or by Zoom telephone.  
Additional information is available on Judge Novack’s Procedures page on the Bankruptcy Court’s  
website, and information on how to attend the hearing by Zoom will be included with each calendar  
posted under Judge Novack’s Calendar on the Bankruptcy Court’s website. If you have questions  
about how to participate in a video or telephonic hearing, you may contact the court by calling  
888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website at  
www.canb.uscourts.gov.

<sup>2</sup> Unless otherwise indicated, “Debtors” as used herein excludes KSMP.

1           **PLEASE TAKE FURTHER NOTICE** that a copy of the Objection and its supporting  
2 documents can be viewed and/or obtained by: (i) accessing the Bankruptcy Court's website at  
3 <http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450 Golden  
4 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' claims and noticing agent, KCC  
5 dba Verita Global, at the following web address: <https://www.veritaglobal.net/LM>, or by calling  
6 (877) 709-4751 (toll free) for U.S. and Canada-based parties; or (424) 236-7231 for International  
7 parties or by e-mail at: [www.veritaglobal.net/lm/inquiry](http://www.veritaglobal.net/lm/inquiry). Note that a PACER password is needed  
8 to access documents on the Bankruptcy Court's website.

9 Dated: December 9, 2025

**KELLER BENVENUTTI KIM LLP**

By: /s/ Thomas B. Rupp

Thomas B. Rupp

*Attorneys for the Debtors and Debtors in  
Possession*