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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re:

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

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**OBJECTION TO CLAIM OF CASEY
THOMPSON AND MICHAEL
DESANTIS (PROOF OF CLAIM
NO. 905)**

In re:

KS MATTSON PARTNERS, LP,

Debtor.

Date: February 11, 2026

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 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: (A) THE HONORABLE CHARLES NOVACK, UNITED STATES BANKRUPTCY**
2 **JUDGE; (B) THE OFFICE OF THE UNITED STATES TRUSTEE; (C) THE AFFECTED**
3 **CLAIMANTS; AND (D) OTHER PARTIES ENTITLED TO NOTICE:**

4 LeFever Mattson, a California corporation ("LeFever Mattson"), and its affiliates that are
5 debtors and debtors in possession (together with LeFever Matson, the "LFM Debtors") in the
6 above-captioned chapter 11 cases (the "Chapter 11 Cases"), file this objection (the "Objection")
7 to the claim of Casey Thompson and Michael DeSantis ("Claimants"), Proof of Claim No. 905
8 (the "Claim"), a copy of which (without exhibits or attachments) is attached hereto as **Exhibit A**.
9 In support thereof, the LFM Debtors submit the Declaration of Bradley D. Sharp (the "Sharp
10 Declaration"), filed contemporaneously herewith.

11 **I. JURISDICTION AND VENUE**

12 The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334,
13 the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24
14 (N.D. Cal.), and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court
15 for the Northern District of California (the "Bankruptcy Local Rules"). This is a core proceeding
16 pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408
17 and 1409.

18 **II. BACKGROUND**

19 **A. The Chapter 11 Cases**

20 As described in the *Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions*
21 *and First Day Motions* [Dkt. No. 5], the Chapter 11 Cases were necessitated by, among other
22 things, Mr. Kenneth Mattson's purported sales of equity interests in many of the Debtors to
23 hundreds of investors through transactions that were not recorded in the books and records of
24 LeFever Mattson or the appropriate Debtor. Debtor Windscape Apartments, LLC, filed its chapter
25 11 petition on August 6, 2024. Fifty-eight Debtors, including LeFever Mattson and RT Capitol
26 Mall, LP ("RT Capitol Mall"), filed their chapter 11 petitions on September 12, 2024. Debtors
27 Pinewood Condominiums, LP, and Ponderosa Pines, LP, filed their chapter 11 petitions on October
28 2, 2024.

1 The Debtors continue to operate their businesses and manage their properties as debtors in
2 possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The United States
3 Trustee appointed an official committee of unsecured creditors (the “Committee”) in the Chapter
4 11 Cases on October 9, 2024, [Dkt. No. 135] and amended the appointment on November 25, 2024
5 [Dkt. No. 368] and on August 26, 2025 [Dkt. No. 2104], confirming that the Committee would be
6 the official committee in the KSMP Chapter 11 Case. No trustee or examiner has been appointed
7 in these Chapter 11 Cases.

8 **B. The Bar Date Order**

9 On December 13, 2024, the Court entered the *Order (1) Establishing Bar Date; (2)*
10 *Approving Form and Manner of Notice of Bar Date and Procedures with Respect Thereto; and*
11 *(3) Approving Confidentiality Protocols* [Dkt. No. 459] (the “Bar Date Order”). The Bar Date
12 Order set February 14, 2025, at 11:59 p.m. Pacific Time (the “Bar Date”) as the deadline to file all
13 proofs of interest and proofs of claim in respect of any prepetition claim (as defined in section
14 101(5) of the Bankruptcy Code) against the LFM Debtors.

15 **C. The Claim**

16 Claimants filed Proof of Claim No. 905, in the amount of \$800,000, on February 12, 2025.
17 The basis of the claim is described as “Ownership Interest.” Claimants assert that the claim is
18 secured in the amount of \$3,200,000 based on a \$3,200,000 value of property and the basis for
19 perfection is “Possession.”

20 The Claim attaches a “Co-Ownership Agreement” for 222 W. Spain in Sonoma, California,
21 (the “Property”) between Claimants and KS Mattson Partners, LP (the “Co-Ownership
22 Agreement”). The Co-Ownership Agreement was partially executed by only DeSantis, dated
23 March 17, 2020. The Co-Ownership Agreement purports to grant a 25% interest in the Property
24 to the Claimants. The Co-Ownership Agreement provides that “the parties shall execute a Deed
25 of Trust [sic] to reflect the DeSantis/Thompson interest.” A title search for the Property does not
26 show any such instrument was recorded. Although KSMP was the record owner of the Property in
27 2020, it was subsequently transferred to RT Capitol Mall, which was the record owner of the
28 Property as of the date it filed its voluntary petition. The Co-Ownership Agreement purports to

1 recognize an “initial purchase principal sum” by Claimants of \$100,000, “to be paid as agreed by
2 separate agreement.” The Co-Ownership Agreement also purports to define the parties’
3 responsibilities for expenses, including a mortgage, property taxes, and fire insurance.

4 The LFM Debtors’ books and records do not show any amount owing to Claimants. This
5 is consistent with the current schedules of RT Capitol Mall which do not list Claimants as a
6 creditor. *See Amended Schedules of Assets and Liabilities for RT Capitol Mall, LP* [Dkt. No.
7 2289].

8 **III. THE OBJECTION AND REQUEST FOR RELIEF**

9 A claim may not be allowed if it “is unenforceable against the debtor and property of the
10 debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). The LFM Debtors object
11 to the Claim pursuant to section 502(b)(1) because it is entirely unsupported by evidence and thus
12 unenforceable as a matter of law. The LFM Debtors’ books and records show no debt to
13 Claimants, and the Claim itself does nothing to explain or support the asserted amount.

14 Once the objector raises “facts tending to defeat the claim by probative force equal to that
15 of the allegations of the proofs of claim themselves,” *Wright v. Holm (In re Holm)*, 931 F.2d 620,
16 623 (9th Cir. 1991), quoting 3 L. King, *Collier on Bankruptcy* § 502.02 at 502-22 (15th ed. 1991),
17 then “the burden reverts to the claimant to prove the validity of the claim by a preponderance of
18 the evidence,” *Ashford v. Consolidated Pioneer Mortgage (In re Consolidated Pioneer Mortgage)*,
19 178 B.R. 222, 226 (B.A.P. 9th Cir. 1995) (quoting *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173-
20 74 (3d Cir. 1992)), *aff’d without opinion*, 91 F.3d 151 (9th Cir. 1996). “[T]he ultimate burden of
21 persuasion is always on the claimant.” *Holm*, 931 F.2d at 623 (quoting King, *Collier on*
22 *Bankruptcy*); *see also Lundell v. Anchor Constr. Specialists, Inc.*, 223 F.3d 1035, 1039 (9th Cir.
23 2000), *Spencer v. Pugh (In re Pugh)*, 157 B.R. 898, 901 (B.A.P. 9th Cir. 1993); *In re Fidelity*
24 *Holding Co.*, 837 F.2d 696, 698 (5th Cir. 1988). Absent some further showing by Claimants “to
25 prove the validity of the claim[s] by a preponderance of the evidence,” *Ashford*, 178 B.R. at 226,
26 the Claim is unenforceable and should be disallowed.

1 **IV. RESERVATION OF RIGHTS**

2 The LFM Debtors reserve the right to object, as applicable, in the future to any of the claims
3 listed in this Objection on any ground, and to amend, modify, or supplement this Objection to the
4 extent an objection to a claim is not granted, and to file other objections to any proofs of interest
5 or proofs of claim filed in these cases, including, without limitation, objections as to the amounts
6 asserted therein, or any other claims (filed or not) against the LFM Debtors, regardless of whether
7 such claims are subject to this Objection. A separate notice and hearing will be set for any such
8 objection. Should the grounds for objection presented herein be overruled or withdrawn, wholly
9 or in part, the LFM Debtors reserve the right to object to the Claim on any other ground that the
10 LFM Debtors may discover or deem appropriate.

11 **V. NOTICE**

12 Notice of this Motion will be provided to (i) the United States Trustee; (ii) the Committee;
13 (iii) the Claimants, (iv) those persons who have formally appeared in these Chapter 11 Cases and
14 requested service pursuant to Bankruptcy Rule 2002. Based on the circumstances surrounding this
15 Objection and the nature of the relief requested herein, the LFM Debtors respectfully submit that
16 no further notice is required.

17 **WHEREFORE**, the Debtors respectfully request that the Court enter an order disallowing
18 the claim in its entirety and granting such other and further relief as the Court may deem just and
19 appropriate.

20
21 Dated: December 9, 2025

KELLER BENVENUTTI KIM LLP

22
23 By: /s/ Thomas B. Rupp

24 Thomas B. Rupp

25 *Attorneys for the LFM Debtors and*
26 *Debtors in Possession*
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Exhibit A

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Fill in this information to identify the case:

Debtor RT Capitol Mall, LP

United States Bankruptcy Court for the: Northern District of California
(State)

Case number 24-10526

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>Casey Thompson, Michael Desantis</u> Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? Casey Thompson, Michael Desantis Casey Thompson 222 W. Spain Sonoma, CA 94576, United States Contact phone <u>2146825847</u> Contact email <u>cossacks32@comcast.net</u>	Where should payments to the creditor be sent? (if different) Contact phone _____ Contact email _____ Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	



Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____
7. How much is the claim?	\$ <u>800,000</u> Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <u>Ownership Interest</u>
9. Is all or part of the claim secured?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. The claim is secured by a lien on property. Nature or property: <input checked="" type="checkbox"/> Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ Basis for perfection: <u>Possession</u> Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: <u>\$ 3,200,000</u> Amount of the claim that is secured: <u>\$ 3,200,000</u> Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ <u>0</u> Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check all that apply:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Amount entitled to priority

\$ _____

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☒ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 02/12/2025
MM / DD / YYYY

/s/Casey Thompson
Signature

Print the name of the person who is completing and signing this claim:

Name Casey Thompson
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____

Contact phone _____ Email _____



Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (877) 709-4751 | International (424) 236-7231

Debtor: 24-10526 - RT Capitol Mall, LP District: Northern District of California, Santa Rosa Division		
Creditor: Casey Thompson, Michael Desantis Casey Thompson 222 W. Spain Sonoma, CA, 94576 United States Phone: 2146825847 Phone 2: Fax: Email: cossacks32@comcast.net	Has Supporting Documentation: Yes, supporting documentation successfully uploaded Related Document Statement:	
	Has Related Claim: No Related Claim Filed By:	
	Filing Party: Creditor	
Other Names Used with Debtor:	Amends Claim: No Acquired Claim: No	
Basis of Claim: Ownership Interest	Last 4 Digits: No	Uniform Claim Identifier:
Total Amount of Claim: 800,000	Includes Interest or Charges: No	
Has Priority Claim: No	Priority Under:	
Has Secured Claim: Yes: 3,200,000 Based on Lease: No Subject to Right of Setoff: No	Nature of Secured Amount: Real Estate Value of Property: 3,200,000 Annual Interest Rate: Arrearage Amount: 0 Basis for Perfection: Possession Amount Unsecured:	
Submitted By: Casey Thompson on 12-Feb-2025 4:59:59 p.m. Eastern Time Title: Company:		