

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 KS Mattson Partners, LP*

**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

**DEBTOR'S OBJECTION TO CLAIM
 NO. 792 (EQUITABLE OCEAN
 FRONT LLC); NOTICE OF
 OPPORTUNITY FOR HEARING;
 CERTIFICATE OF SERVICE**

In re:
 KS MATTSON PARTNERS, LP,
 Debtor.

Date: February 11, 2026
Time: 11:00 a.m.
Place: Via Zoom or In Person
 United States Bankruptcy Court
 1300 Clay Street, Courtroom 215
 Oakland, CA 94612

Objection Deadline: January 28, 2026

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 **TO: THE HONRABLE CHARLES NOVACK, UNITED STATES BANKRUPTCY JUDGE,**
2 **THE UNITED STATES TRUSTEE, COUNSEL TO THE OFFICIAL COMMITTEE OF**
3 **UNSECURED CREDITORS, AND THE ABOVE-LISTED PARTY:**

4 KS Mattson Partners, LP (the “Debtor”) in the above-captioned bankruptcy case (the
5 “Bankruptcy Case”), pursuant to section 502 title 11 of the United States Code (the “Bankruptcy
6 Code”), Rule 3001 and Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy
7 Rules”), and Rule 3007-1 of the Bankruptcy Local Rules (the “Local Rules”), hereby files this
8 *Debtor’s Objection to Claim No. 792 (Equitable Ocean Front LLC)* (the “Objection”) and requests
9 that the Court enter an order disallowing Claim Number 792 (“Claim No. 792”) asserted by
10 Equitable Ocean Front LLC (the “Claimant”) in this chapter 11 case. Pursuant to Local Rule 3007-
11 1(a), a true and correct copy of Claim No. 792, is attached hereto as **Exhibit A**.

12
13 This Objection is supported by the *Declaration of Robbin Itkin in Support of the Debtor’s*
14 *Objection to Claim No. 792 (Equitable Ocean Front LLC)* (the “Itkin Declaration”) filed herewith,
15 and any other evidence properly before the Court, prior to or at any hearing on the Objection.

16 JURISDICTION

17 1. The United States Bankruptcy Court for the Northern District of California (the
18 “Bankruptcy Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and
19 the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24
20 (N.D. Cal.), and Local Rule 5011-1(a). The Debtor confirms its consent, pursuant to Bankruptcy
21 Rule 7008, to the entry of a final order by the Bankruptcy Court in connection with this Objection
22 to the extent that it is later determined that the Bankruptcy Court, absent consent of the parties,
23 cannot enter final orders or judgments in connection herewith consistent with Article III of the
24 United States Constitution.
25

26 2. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue
27 is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
28

BACKGROUND

A. General Background

3. This case arises from an alleged multiyear and multimillion-dollar fraud perpetrated by Mr. Mattson. This alleged fraud resulted in multiple prepetition litigations against Debtor KSMP, Kenneth Mattson, and LeFever Mattson, a California corporation (the real estate corporation jointly owned by Mr. Mattson and Tim LeFever). It has also resulted in the United States Department of Justice bringing serious criminal charges against Mr. Mattson.

4. On November 22, 2024 (the “Petition Date”), Debtor KSMP became subject to an involuntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2025 (the “Relief Date”), the Court entered the *Stipulated Order for Relief in an Involuntary Case* [Case No. 24-10715, Dkt. No. 131] and subsequently appointed Robbin L. Itkin as the Responsible Individual in its chapter 11 case (the “Responsible Individual”), with effect from June 16, 2025 [Case No. 24-10715, Dkt. No. 172].

5. Debtor KSMP continues to operate its business and manage its properties as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On August 26, 2025, a committee of unsecured creditors (the “Committee”) was appointed in this chapter 11 case (the “KSMP Chapter 11 Case”), consisting of the same members as the LeFever Mattson committee [Dkt No. 2104].

B. KS Mattson Partners, LP

6. Debtor KSMP is a California limited partnership, established on August 16, 1999, to manage and develop assets held by Kenneth Mattson and his family. Debtor KSMP’s partnership agreement provides that its partnership interests are held by each of Mr. Mattson (49%), Mr. Mattson’s wife, Stacy Mattson, (49%), and K S Mattson Company, LLC (“KSMC”) (2%). Because Debtor KSMP failed to maintain adequate books and records before the Relief Date, the

1 Responsible Individual is currently undertaking efforts to determine what assets Debtor KSMP
2 owns. At present, the Responsible Individual believes that Debtor KSMP holds interests in
3 approximately 36 properties, some owned outright and others held as tenant-in-common with other
4 investors, although this number remains subject to change as further diligence and investigation are
5 completed. Debtor KSMP has no employees.

7 **C. Jointly Administered Cases and Substantive Consolidation**

8 7. On September 19, 2024, LeFever Mattson and fifty-seven affiliates and subsidiaries
9 (collectively, the “LFM Debtors” and, together with Debtor KSMP, the “Debtors”)—parties related
10 to Debtor KSMP—filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code,
11 commencing their jointly administered bankruptcy cases (the “LFM Chapter 11 Cases”). On June
12 20, 2025, the Committee filed the *Motion of the Official Committee of Unsecured Creditors for*
13 *Substantive Consolidation of Debtor LeFever Mattson and KS Mattson Partners, LP and for*
14 *Related Relief* [Dkt No. 1585] (the “Substantive Consolidation Motion”), by which the Committee
15 sought to substantively consolidate the KSMP and LeFever Mattson estates. Following significant
16 diligence and extensive negotiations between Debtor KSMP, the LFM Debtors and the Committee,
17 the Committee agreed to hold its Substantive Consolidation Motion in abeyance while the parties
18 worked together to produce a joint chapter 11 plan.

21 8. On July 29, 2025, the Court entered the *Stipulated Bridge Order in Connection with*
22 *the Motion to Substantively Consolidate the Bankruptcy Estates of LeFever Mattson and KS*
23 *Mattson Partners, LP* [Dkt No. 1887], which, among other things, holds the Substantive
24 Consolidation Motion in abeyance and jointly administers Debtor KSMP’s Chapter 11 Case with
25 the LFM Chapter 11 Cases (collectively, the “Chapter 11 Cases”).²

27 ² One other entity, Windscape Apartments, LLC, filed a voluntary petition for chapter 11 (Case No. 24-10417) on
28 August 6, 2024, and two other entities, Pinewood Condominiums, LP (Case No. 24-10598) and Ponderosa Pines, LP
(Case No. 24-10599), filed voluntary chapter 11 petitions on October 2, 2024. These entities are the LeFever Mattson
Debtors.

1 **D. Bar Date and Proof of Claim Analysis**

2 9. On August 25, 2025, the Court entered the *Order Granting Motion for an Order (1)*
3 *Establishing Bar Date; (2) Approving Form and Manner of Notice of Bar Date and Procedure with*
4 *Respect thereto; and (3) Approving Confidentiality Protocols* [Dkt. No. 2184] (the “KSMP Bar
5 Date Order”). The KSMP Bar Date Order fixed October 3, 2025 as the last day for general
6 unsecured creditors to file proofs of claim in the KSMP Chapter 11 Case (the “KSMP Bar Date”).

7 10. Debtor KSMP and the Committee are reviewing approximately 800 claims that were
8 filed prior to the KSMP Bar Date. In particular, the Committee’s financial advisor, Pricewaterhouse
9 Coopers (“PwC”), is undertaking a detailed review of investor proofs of claim to conduct the netting
10 analysis necessary to calculate each investor’s potential claim for plan voting and distribution
11 purposes. The information from the KSMP proof of claims process is being analyzed jointly with
12 those filed in the LFM Chapter 11 Cases.

13 **E. Claim No. 792**

14 11. On October 2, 2025, the Claimant filed Claim No. 792 in the amount of
15 \$23,000,000.00 and stating that the basis of the claim was “Acquisition of 1819 Coast Boulevard,
16 Del Mar, CA.”

17 12. The Claimant provided no supporting documents to substantiate or support the
18 amount and validity of Claim No. 792 as required by Bankruptcy Rule 3001(c).

19 **ARGUMENT**

20 **A. Legal Standard**

21 13. When a claimant files a proof of its claim pursuant to 11 U.S.C. § 501, such claim
22 is deemed allowed unless a party in interest objects. 11 U.S.C. §502(a). A claimant must attach
23 copies of writings upon which claims are based in order to carry their burden of establishing a prima
24 facie case against the debtor. *In re King Investments, Inc.* 219 B.R. 848, 858 (9th Cir. BAP 1998).
25
26
27
28

1 In considering whether to allow a claim, a bankruptcy court may take judicial notice of the
2 underlying records in a bankruptcy case. Fed. R. Evid. 201(c); *See also In re E.R. Fergert*, 887
3 F.2d. 955, 957-958 (9th Cir. 1989).

4
5 14. Bankruptcy Rule 3001(c) requires that where a “a claim or an interest in the debtor’s
6 property securing the claim is based on a writing, the creditor must file a copy with the proof of
7 claim.”

8 15. Pursuant to 11 U.S.C. §502 and Bankruptcy Rules 3001 and 3007, the Debtor
9 objects to the allowance of Claim No. 792. A claim should not be allowed if that “claim is
10 unenforceable against the debtor and property of the debtor, under any agreement or applicable law
11” 11 U.S.C. §502(b)(1).

12
13 **B. The Objection**

14 16. As detailed above, Claimant did not provide sufficient—or any—documentation to
15 support the amount or validity of Claim No. 792, as required by Bankruptcy Rule 3001(c). Claim
16 No. 792 asserts a claim arising from an alleged “acquisition” of real property. Any such acquisition
17 must be evidenced by a written instrument under the statute of frauds, yet no agreement, deed or
18 other supporting documentation was submitted with the claim. The Debtor’s books and records
19 likewise contain no information supporting the claim, and Claimant provides no explanation or
20 legal basis to substantiate the asserted amount.

21
22 17. Accordingly, the Debtor respectfully requests that Claim No. 792 be disallowed in
23 its entirety and expunged from the claims register.

24 **RESERVATION OF RIGHTS**

25 18. The Debtor expressly reserves its right to amend, modify, or supplement this
26 Objection or to file additional objections to Claim No. 792 or any other proofs of claim (filed or
27 not filed) that any creditor asserting a Claim may assert against the Debtor.
28

1 **CONCLUSION**

2 **WHEREFORE**, the Debtor respectfully requests that this Bankruptcy Court enter an
3 Order:

- 4 1. Sustaining the Objection in its entirety;
5 2. Disallowing Claim No. 792 in its entirety;
6 3. Granting such other relief as is just and proper.
7

8
9 Dated: December 9, 2025

/s/ Richard L. Wynne

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 KS Mattson Partners, LP*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 1

Claim No. 792

Proof of Claim

Fill in this information to identify the case:Debtor 1 KS Mattson Partners, LP

Debtor 2

(Spouse, if filing)

United States Bankruptcy Court California Northern Bankruptcy CourtCase number: 24-10715

FILED

U.S. Bankruptcy Court
California Northern Bankruptcy Court

10/2/2025

Edward J. Emmons, Clerk

**Official Form 410
Proof of Claim**

04/25

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 of 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>Equitable Ocean Front LLC</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? <u>Equitable Ocean Front LLC</u> Name 3131 Fourth Avenue San Diego, CA 92103 Contact phone <u>6192323090</u> Contact email <u>kevinyoungesq@aol.com</u> Uniform claim identifier (if you use one): _____	Where should payments to the creditor be sent? (if different) _____ Name _____ Contact phone _____ Contact email _____
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 _____ <div style="text-align: right;">MM / DD / YYYY</div>	
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? _____	

Official Form 410

Proof of Claim

page 1



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?	<div><input checked="" type="checkbox"/> No</div> <div><input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____</div>
7. How much is the claim?	<div><div style="display: flex; align-items: center;"><div style="margin-right: 10px;">\$</div><div style="border-bottom: 1px solid black; flex-grow: 1; text-align: center;">23000000.00</div></div><div style="margin-top: 10px;">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).</div></div>
8. What is the basis of the claim?	<p>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).</p> <p>Limit disclosing information that is entitled to privacy, such as healthcare information.</p> <p>Acquisition of 1819 COAST BOULEVARD, Del Mar, CA</p> <div style="border-bottom: 1px solid black; height: 1.2em; margin-top: 5px;"></div>
9. Is all or part of the claim secured?	<div><input checked="" type="checkbox"/> No</div> <div><input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <div><input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i>.</div><div><input type="checkbox"/> Motor vehicle</div><div><input type="checkbox"/> Other. Describe: _____</div></div> <div style="margin-top: 20px;">Basis for perfection: _____</div> <p>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.)</p> <div style="margin-top: 20px;"><div>Value of property:</div><div style="display: flex; align-items: center;"><div style="border-bottom: 1px solid black; flex-grow: 1;"></div><div style="margin-left: 5px;">\$</div></div><div style="margin-top: 10px;"><div>Amount of the claim that is secured:</div><div style="display: flex; align-items: center;"><div style="border-bottom: 1px solid black; flex-grow: 1;"></div><div style="margin-left: 5px;">\$</div></div><div style="margin-top: 10px;"><div>Amount of the claim that is unsecured:</div><div style="display: flex; align-items: center;"><div style="border-bottom: 1px solid black; flex-grow: 1;"></div><div style="margin-left: 5px;">\$</div><div style="margin-left: 10px; font-size: 0.9em;">(The sum of the secured and unsecured amounts should match the amount in line 7.)</div></div></div></div><div style="margin-top: 20px;"><div>Amount necessary to cure any default as of the date of the petition:</div><div style="display: flex; align-items: center;"><div style="border-bottom: 1px solid black; flex-grow: 1;"></div><div style="margin-left: 5px;">\$</div></div><div style="margin-top: 10px;"><div>Annual Interest Rate (when case was filed)</div><div style="display: flex; align-items: center;"><div style="border-bottom: 1px solid black; flex-grow: 1;"></div><div style="margin-left: 5px;">%</div></div><div style="margin-top: 5px;"><input type="checkbox"/> Fixed <input type="checkbox"/> Variable</div></div></div></div>
10. Is this claim based on a lease?	<div><input checked="" type="checkbox"/> No</div> <div><input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____</div>
11. Is this claim subject to a right of setoff?	<div><input type="checkbox"/> No</div> <div><input checked="" type="checkbox"/> Yes. Identify the property: <div style="display: flex; align-items: center;"><div style="border-bottom: 1px solid black; flex-grow: 1; text-align: center;">19000000 wrap around note</div></div></div>

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <i>Check all that apply.</i>	Amount entitled to priority
A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.	<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Up to \$3,800* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Wages, salaries, or commissions (up to \$17,150*) 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). <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(<u> </u>) that applies	\$ _____ \$ _____ \$ _____ \$ _____ \$ _____ \$ _____
* Amounts are subject to adjustment on 4/01/28 and every 3 years after that for cases begun on or after the date of adjustment.		

Part 3: Sign Below

<p>The person completing this proof of claim must sign and date it. FRBP 9011(b).</p> <p>If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.</p> <p>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.</p>	<p>Check the appropriate box:</p> <p><input type="checkbox"/> I am the creditor.</p> <p><input checked="" type="checkbox"/> I am the creditor's attorney or authorized agent.</p> <p><input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.</p> <p><input type="checkbox"/> I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.</p> <p>I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.</p> <p>I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.</p> <p>I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on date <u>10/2/2025</u></p> <p style="text-align: center;">MM / DD / YYYY</p> <p><u>/s/ Kevin C. Young</u></p> <p>Signature</p> <p>Print the name of the person who is completing and signing this claim:</p> <p>Name <u>Kevin C. Young</u></p> <p style="text-align: center;">First name Middle name Last name</p> <p>Title _____</p> <p>Company _____</p> <p>Address <u>3131 Fourth Avenue</u></p> <p style="text-align: center;">Number Street</p> <p style="text-align: center;"><u>San Diego, CA 92103</u></p> <p style="text-align: center;">City State ZIP Code</p> <p>Contact phone <u>6192323090</u> Email <u>kevinyoungesq@aol.com</u></p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------