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*Counsel to LeFever Mattson and Its
Affiliated Debtors and Debtors in
Possession*

The following constitutes the order of the Court.

Signed: December 10, 2025

Charles Novack
U.S. Bankruptcy Judge

Richard L. Wynne (CA Bar No. 120349)
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Counsel to KS Mattson Partners, LP

*Counsel to the Official Committee
of Unsecured Creditors*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re

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

Debtors.

Case No. 24-10545 CN (Lead Case)

(Jointly Administered)

Chapter 11

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>.



In re
KS MATTSON PARTNERS, LP,
Debtor.

ORDER (I) APPROVING THE PLAN SUMMARY AND APPROVING DISCLOSURE STATEMENT; (II) SCHEDULING STATUS CONFERENCE ON CONFIRMATION OF PLAN AND APPROVING THE FORM AND MANNER OF SERVICE OF THE CONFIRMATION NOTICE; (III) ESTABLISHING PROCEDURES FOR THE SOLICITATION AND TABULATION OF VOTES ON PLAN; (IV) ESTIMATING INVESTOR CLAIMS AND INTERESTS SOLELY FOR VOTING PURPOSES; AND (V) APPROVING RELATED MATTERS

This matter coming before the Court on the *Amended Motion for an Order (I) Approving the Plan Summary and Approving Disclosure Statement; (II) Scheduling Hearing on Confirmation of Plan and Approving the Form and Manner of Service of the Confirmation Hearing Notice; (III) Establishing Procedures for the Solicitation and Tabulation of Votes on Plan; (IV) Establishing Procedures for Estimation of Investor Claims and Interests Solely for Voting Purposes; and (V) Approving Related Matters* [Docket No. 2569] (the “Motion”),² jointly filed by the above-captioned debtors and debtors-in-possession (the “Debtors”) and Official Committee of Unsecured Creditors (the “Committee” and together with the Debtors, the “Plan Proponents”), together with the *Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. 3054] (as it may be amended or modified, including all exhibits thereto, the “Plan”) of the Debtors proposed by the Plan Proponents, and the *Third Amended Disclosure Statement in Support of the Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. 3055] (the “Disclosure Statement”); the Court having reviewed the Motion and having heard the statements of counsel regarding the relief requested in the Motion at hearings before the Court (the “Hearings”); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearings establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

- 1 2. The Plan Summary is approved as part of the Solicitation Package.
- 2 3. The Disclosure Statement, as modified on the record, is approved as containing
- 3 adequate information within the meaning of section 1125 of the Bankruptcy Code.
- 4 4. The Confirmation Notice and Notice of Non-Voting Status, attached hereto as
- 5 **Exhibit 1** and **Exhibit 2** respectively, are approved in all respects.
- 6 5. The forms of Ballot, attached hereto as **Exhibit 3**, are approved in all respects.
- 7 6. The Plan Proponents are authorized to include Investor Claim Settlement Offer
- 8 Letters, a form of which is attached hereto as **Exhibit 4**, in the Solicitation Packages for Investors.
- 9 7. December 10, 2025 is established as the Voting Record Date for the purposes of
- 10 determining the creditors and equity interest holders entitled to receive the Solicitation Package and
- 11 to vote on the Plan or to receive the Notice of Non-Voting Status, subject to Vote Tabulation /
- 12 Estimation Procedures.
- 13 8. The Solicitation Package and Notices of Non-Voting Status shall be served by
- 14 December 17, 2025.
- 15 9. If multiple Solicitation Packages would otherwise go to the same physical address,
- 16 the Plan Proponents shall be permitted, but not required, to combine the Solicitation Packages into
- 17 a single Solicitation Package with multiple ballots, even if the claimant names are not identical.
- 18 10. Any Plan Supplement must be filed by December 19, 2025.
- 19 11. Ballots must be received on or before **January 21, 2026 at 11:59 p.m. (Pacific**
- 20 **Time)** (“Voting Deadline”) in accordance with the instructions on the applicable Ballot, unless
- 21 extended by the Plan Proponents in writing. The Plan Proponents have the authority, without further
- 22 order from the Court, to extend the Voting Deadline.
- 23 12. The Vote Tabulation/Estimation Procedures, attached hereto as **Exhibit 5**, are
- 24 approved in all respects.
- 25 13. Each unique Investor will receive one Class 5 Ballot on account of an Investor Claim.
- 26 Investors with substantially similar names, that list the same noticing address on their Claims, and
- 27 for which the Plan Proponents determine upon good faith are the same person or entity will be
- 28 treated as one Investor. For example, if the “Doe Family Trust” and the “Doe Family Trust, dated

1 January 1, 2000” provide the same address where notices should be sent on their Claims and/or
2 Interests and the Plan Proponents believe these entities are the same, then the “Doe Family Trust”
3 and the “Doe Family Trust, dated January 1, 2000” will be treated as a single Investor. However,
4 the “Doe Family Trust” and “Jane Doe” will not be considered a single Investor even if the relevant
5 Interests or Claims list the same noticing address as these Investors do not have substantially similar
6 names.

7 14. Pursuant to Bankruptcy Code sections 105(a) and 502(c) and Bankruptcy Rule
8 3018(a), each Class 5 Claim will be estimated and temporarily allowed solely for purposes of voting
9 on the Plan in the amount of the corresponding Investor Tranche 1 Claim, as provided under
10 applicable Ninth Circuit law. If an Investor Tranche 1 Claim is calculated as equal to \$0.00, such
11 Class 5 Claim shall be temporarily allowed for voting purposes only, and not for purposes of
12 allowance or distribution, in the amount of \$1.00

13 15. Any Rule 3018 Motion by a party other than an Investor on account of its Investor
14 Claim must be filed with the Court, together with proof of service thereof, and served upon: (i) the
15 Office of the United States Trustee; (ii) counsel for the Debtors; (iii) counsel for the Committee;
16 and (iv) any party that has requested notice pursuant to Bankruptcy Rule 2002 by hand delivery or
17 in a manner as will cause such objection to be received by all such parties on or before **January 21,**
18 **2026**. Any objections not filed and served as set forth above may not be considered by the Court.
19 Any objection to such Rule 3018 Motion must be filed by no later than **January 28, 2026**.
20 Responses, if any, in support of the Rule 3018 Motion must be filed no later than **February 3, 2026**.
21 Any such Rule 3018 Motion may be resolved by agreement between the Plan Proponents and the
22 movant without the requirement for further order or approval of the Court. As to any creditor filing
23 a Rule 3018 Motion, such creditor’s Ballot shall not be counted unless temporarily allowed by the
24 Court for voting purposes after notice and a hearing, prior to or at the Confirmation Hearing. Any
25 unresolved Rule 3018 Motion and objection(s) thereto shall be heard at the Confirmation Hearing
26 or any other date selected by the Plan Proponents or pursuant to further Court order.

27 16. Secured Lenders may each file Rule 3018 Motions by January 21, 2026 to seek
28 temporary allowance of their Secured Lender Unsecured Claims for voting purposes. Where such

1 Rule 3018 Motions have been filed, ballots submitted by such Secured Lenders by **January 21,**
2 **2026** will be held and counted if the Court grants such Rule 3018 Motions after the Voting Deadline.

3 17. With respect to Class 3 Secured Lender Claims, the Plan Proponents may file any
4 claim objections against a Secured Lender Claim for Plan voting purposes **no later than 14 days**
5 **before the Confirmation Hearing**, with any responses by the applicable Secured Lenders due **no**
6 **later than 7 days before the Confirmation Hearing**, with a hearing to be held on any unresolved
7 objections at the Confirmation Hearing or a later date selected by the Plan Proponents. The Plan
8 Proponents may enter into stipulations with Secured Lenders allowing their Class 3 Claims for
9 voting purposes.

10 18. Objections to confirmation of the Plan must be in writing, must conform to the
11 Bankruptcy Rules, must set forth the name of the objector, the nature and amount of Claims or
12 Interests held or asserted by the objector against the Debtors, the basis for the objection and the
13 specific grounds of the objection, and must be filed with the Bankruptcy Court, together with proof
14 of service thereof, and served upon: (i) the Office of the United States Trustee; (ii) counsel for the
15 Debtors; (iii) counsel for the Committee; and (iv) any party that has requested notice pursuant to
16 Bankruptcy Rule 2002 by hand delivery or in a manner as will cause such objection to be received
17 by all such parties on or before **January 21, 2026**. Any objections not filed and served as set forth
18 above may not be considered by the Court.

19 19. The below additional dates and deadlines have been approved.

Deadline to Serve Written Discovery	December 31, 2025
Deadline for parties to identify the topics on which they intend to submit expert reports (other than rebuttal expert reports)	December 31, 2025
Deadline to Serve Responses & Objections to Written Discovery	January 30, 2026
Deadline to identify expert witnesses	January 30, 2026
Document Productions Completed	January 30 2026
Expert Reports Due	January 30, 2026

Deadline to Complete Depositions of Fact Witnesses

January 30, 2026

(All fact and expert witnesses will have the option of being deposed either in person or by Zoom. If a witness chooses to be deposed in person, all parties may attend either in person or by Zoom, at their choosing)

20. On **January 23, 2026 at 11:00 a.m. (Pacific Time)** a **status conference** (“Confirmation Status Conference”) will be held before the Honorable Charles Novack, United States Bankruptcy Judge, to determine the date for the hearing on confirmation of the Plan (the “Confirmation Hearing”) and all other dates related to confirmation of the Plan, including the deadlines for identifying rebuttal experts, responses to objections to confirmation of the Plan, the Voting Report, and the brief in support of confirmation of the Plan. Counsel and interested parties may appear at the Confirmation Status Conference in person in Courtroom 215 of the United States Bankruptcy Court, 1300 Clay Street in Oakland, California or via Zoom video or telephone. The Zoom information will be included in each calendar posted weekly, as applicable.

21. The Confirmation Hearing may be adjourned from time to time without further notice to creditors and other parties-in-interest by an announcement of the adjourned date at the Confirmation Hearing or any adjournment thereof or by an appropriate filing with the Court.

22. The relief granted herein shall apply to all Debtors.

23. The Plan Proponents are authorized to take or refrain from taking any action necessary or appropriate to implement the terms of and the relief granted in this Order without seeking further order of the Court.

24. The Plan Proponents are authorized to make non-substantive changes to the Disclosure Statement, Plan, Plan Summary, Ballots, Confirmation Notice, Notice of Non-Voting Status, and related documents without further order of the Court, including changes to correct typographical and grammatical errors and to make conforming changes among the aforementioned documents prior to their distribution.

25. This Court shall retain jurisdiction over all matters related to or arising from the Motion or the interpretation or implementation of this Order.

***** END OF ORDER *****

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COURT SERVICE LIST

All ECF Participants

EXHIBIT 1

Confirmation Notice

1 Tobias S. Keller (CA Bar No. 151445)
David A. Taylor (CA Bar No. 247433)
2 Thomas B. Rupp (CA Bar No. 278041)
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dtaylor@kbbkllp.com
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7 *Counsel to LeFever Mattson and Its
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*Counsel to the Official
Committee of Unsecured Creditors*

8 Richard L. Wynne (CA Bar No. 120349)
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Edward J. McNeilly (CA Bar No. 314588)
10 HOGAN LOVELLS US LLP
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11 Los Angeles, California 90067
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13 edward.mcneilly@hoganlovells.com

14 *Counsel to KS Mattson Partners, LP*

15
16 **UNITED STATES BANKRUPTCY COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SANTA ROSA DIVISION**

19 In re
20 LEFEVER MATTSON,
a California corporation, *et al.*,¹
21 Debtors.

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

22
23
24
25 ¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax
26 identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton
27 Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other
28 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>.

In re
KS MATTSON PARTNERS, LP,
Debtor.

**NOTICE OF (I) APPROVAL OF
DISCLOSURE STATEMENT; (II) STATUS
CONFERENCE HEARING TO CONSIDER
CONFIRMATION OF THE PLAN;
(III) DEADLINE FOR FILING OBJECTIONS
TO CONFIRMATION OF THE PLAN;
(IV) DEADLINE FOR VOTING ON THE
PLAN; AND (V) RELATED MATTERS**

Status Conference Hearing Date:

Date: January 23, 2026
Time: 11:00 a.m. (Pacific Time)
Place: *Via Zoom or In-Person at:*
United States Bankruptcy Court
1300 Clay Street, Courtroom 215
Oakland, CA 94612
Judge: Honorable Charles Novack

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On December [•], 2025, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. •] (as it may be amended or modified, including all exhibits thereto, the “Plan”) of the Debtors proposed by the Debtors and the Official Committee of Unsecured Creditors appointed in the above-captioned chapter 11 cases (the “Committee”). On December [•], 2025, the Debtors and Committee filed the *Third Amended Disclosure Statement in Support of the Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. •] (as it may be amended or modified, including all exhibits thereto, the “Disclosure Statement”); and a related summary of the Plan provided to Investors in Class 5 [Docket No. •] (as amended, the “Plan Summary”).²

2. By an Order dated December [•], 2025 [Docket No. •] (the “Solicitations Procedures Order”), the Bankruptcy Court approved the Disclosure Statement as containing adequate information within the meaning of section 1125 of Bankruptcy Code.

3. By the Solicitation Procedures Order, the Bankruptcy Court established **January 21, 2026 at 11:59 p.m. (Pacific Time)** (the “Voting Deadline”) as the deadline by which ballots accepting or rejecting the Plan must be received. To be counted, your original ballot must actually

² Any capitalized terms not defined herein have the meaning ascribed to such terms in the Plan or Disclosure Statement, as applicable.

1 be **received** on or before the Voting Deadline by the Debtors' balloting agent, Verita Global, either
2 electronically as specified on your ballot or to the following address:

3 LeFever Mattson Ballot Processing Center
4 c/o KCC dba Verita
222 N. Pacific Coast Highway, Suite 300
5 El Segundo, CA 90245

6 4. Each unique Investor will receive one Class 5 Ballot on account of their Investor
7 Claim. Investors with substantially similar names, that list the same noticing address on their Claims,
8 and for which the Plan Proponents determine upon good faith are the same person or entity will be
9 treated as one Investor. For example, if the "Doe Family Trust" and the "Doe Family Trust, dated
10 January 1, 2000" provide the same address where notices should be sent on their Claims and/or
11 Interests and the Plan Proponents believe these entities are the same, then the "Doe Family Trust"
12 and the "Doe Family Trust, dated January 1, 2000" will be treated as a single Investor. However,
13 the "Doe Family Trust" and "Jane Doe" will not be considered a single Investor even if the relevant
14 Interests or Claims list the same noticing address as these Investors do not have substantially similar
15 names.

16 5. The Plan Supplement will be filed by the Debtors and the Committee by
17 **December 19, 2025**, which will be served on all parties that have requested special notice in the
18 cases under Bankruptcy Rule 2002, and will be available to review and download for free from the
19 Voting Agent's website at <https://veritaglobal.net/LM> on and after the filing of the Plan Supplement.

20 6. On **January 23, 2026 at 11:00 a.m. (Pacific Time)**, a **status conference**
21 (**"Confirmation Status Conference"**) will be held before the Honorable Charles Novack, United
22 States Bankruptcy Judge to determine when the hearing on confirmation of the Plan (the
23 **"Confirmation Hearing"**) will take place and to set additional deadlines in connection with the
24 Confirmation Hearing. Counsel and interested parties may appear at the Confirmation Status
25 Conference and Confirmation Hearing in person in Courtroom 215 of the United States Bankruptcy
26 Court, 1300 Clay Street in Oakland, California or via Zoom video or telephone. The Zoom
27 information will be included in each calendar posted weekly, as applicable.

1 7. The Confirmation Hearing may be adjourned from time to time, without further
2 notice. The Plan may be modified in accordance with the Bankruptcy Code, the Federal Rules of
3 Bankruptcy Procedure, the Plan, and other applicable law, without further notice, prior to or as a
4 result of the Confirmation Hearing.

5 8. The below additional dates and deadlines have been approved.

6 Deadline to Serve Written Discovery	December 31, 2025
7 Deadline for parties to identify the topics on 8 which they intend to submit expert reports 9 (other than rebuttal expert reports)	December 31, 2025
10 Deadline to Serve Responses & Objections 11 to Written Discovery	January 30, 2026
12 Deadline to identify expert witnesses	January 30, 2026
13 Document Productions Completed	January 30, 2026
14 Expert Reports Due	January 30, 2026
15 Deadline to Complete Depositions of Fact 16 Witnesses 17 (All fact and expert witnesses will have the 18 option of being deposed either in person or 19 by Zoom. If a witness chooses to be deposed 20 in person, all parties may attend either in 21 person or by Zoom, at their choosing)	January 30, 2026

22 9. Objections to confirmation of the Plan, including any supporting memoranda, if any,
23 must (a) be in writing; (b) state the name and address of the objecting party and the nature of the
24 claim or interest of such party; (c) state with particularity the basis and nature of any objection,
25 where possible; and (d) be filed with the Bankruptcy Court and served on the following parties so
26 that all objections are received on or before **January 21, 2026**: (a) Counsel to the LFM Debtors:
27 Keller Benvenuti Kim LLP, Attn: Tobias Keller, David Taylor, Dara Silveira, and Thomas Rupp
28 (tkeller@kbkllp.com, dtaylor@kbkllp.com, dsilveira@kbkllp.com, trupp@kbkllp.com), 101
Montgomery St., Suite 1950, San Francisco, CA 94104; (b) counsel to KSMP: Hogan Lovells US
LLP, Attn: Richard Wynne, Erin Brady, and Edward McNeilly (richard.wynne@hoganlovells.com,
erin.brady@hoganlovells.com, edward.mcneilly@hoganlovells.com); (c) counsel to the

Committee: Pachulski Stang Ziehl & Jones LLP, Attn: Debra Grassgreen, Jason Rosell, and Brooke Wilson (dgrassgreen@pszjlaw.com, jrosell@pszjlaw.com, bwilson@pszjlaw.com), One Sansome St., Suite 3430, San Francisco, CA 94104-4436; (d) Office of the United States Trustee, Northern District of California, 450 Golden Gate Avenue, Room 05-0153, San Francisco, CA 94102 (Attn: Jared A. Day) (jared.a.day@usdoj.gov); and (e) all other parties in interest that have filed requests for notice pursuant to Bankruptcy Rule 2002 in the Debtors' chapter 11 cases.

5. In accordance with Bankruptcy Rule 3017(a), requests for copies of the Disclosure Statement, the Plan, or the Motion by parties in interest may be made in writing to counsel for the Debtors or counsel for the Committee. Copies of the Disclosure Statement and the Plan (along with exhibits to each as they are filed with the Bankruptcy Court) and the Motion are available for review, at no charge, at <https://veritaglobal.net/LM>.

6. **IF YOU HAVE ANY QUESTIONS REGARDING YOUR CLAIM OR THE VOTING PROCEDURES, OR IF YOU NEED A BALLOT OR ADDITIONAL COPIES OF THE DISCLOSURE STATEMENT OR OTHER ENCLOSED MATERIALS, PLEASE CONTACT THE VOTING AGENT, VERITA GLOBAL, 1-(877) 709-4751 (U.S. / CANADA), 1-(425) 236-7321 (INTERNATIONAL) OR BY SUBMITTING AN INQUIRY AT: <https://veritaglobal.net/lm/inquiry>.**

Dated: December __, 2025

KELLER BENVENUTTI KIM LLP

By: /s/ DRAFT

David A. Taylor

Counsel to the LFM Debtors

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ DRAFT

Jason H. Rosell

Counsel to the Committee

HOGAN LOVELLS US LLP

By: /s/ DRAFT

Erin N. Brady

Counsel to KS Mattson Partners, LP

EXHIBIT 2

Notice of Non-Voting Status

Tobias S. Keller (CA Bar No. 151445)
David A. Taylor (CA Bar No. 247433)
Thomas B. Rupp (CA Bar No. 278041)
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edward.mcneilly@hoganlovells.com

Counsel to 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.

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

NOTICE OF NON-VOTING STATUS

In re
KS MATTSON PARTNERS, LP,
Debtor.

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 **PLEASE TAKE NOTICE THAT:**

2 1. On December __, 2025, LeFever Mattson, KS Mattson Partners LP, and their affiliated
3 debtors and debtors in possession (collectively, "LFM" or the "Debtors") and the Official
4 Committee of Unsecured Creditors (the "Committee" and together with the Debtors, the "Plan
5 Proponents") filed the *Third Amended Joint Chapter 11 Plan of Liquidation* of the Debtors [Docket
6 No. •] (including all exhibits thereto and as amended, modified or supplemented from time to time,
7 the "Plan").

8 2. On December __, 2025, the Plan Proponents filed (a) a summary of the Plan for
9 Investors in Class 5 under the Plan (as amended, the "Plan Summary"); and (b) a related *Third*
10 *Amended Disclosure Statement in Support of Third Amended Joint Chapter 11 Plan of Liquidation*
11 of the Debtors [Docket No. •] (including all exhibits thereto and as amended, modified or
12 supplemented from time to time, the "Disclosure Statement") under section 1125 of the Bankruptcy
13 Code.

14 3. By an Order dated December __, 2025 (the "Solicitation Procedures Order"), the
15 Bankruptcy Court approved the Disclosure Statement as containing adequate information within the
16 meaning of section 1125 of the Bankruptcy Code and approved certain procedures (collectively, the
17 "Solicitation Procedures") for the solicitation and tabulation of votes to accept or reject the Plan,
18 and scheduled hearings on confirmation of the Plan.

19 4. The Plan Proponents (a) are required to mail voting materials to all creditors and
20 equity interest holders entitled to vote on the Plan and (b) are not required to provide voting materials
21 to such holders that are conclusively presumed to either accept or reject the Plan (collectively, the
22 "Non-Voting Classes"). Accordingly, you are receiving this Notice of Non-Voting Status for the
23 Plan instead of voting materials containing the Disclosure Statement and the Plan.

24 5. **If you wish to challenge the classification of your claim or interest *except with***
25 ***respect to any Investor Claims***, you, pursuant to Bankruptcy Rule 3018(a), must file a motion (a
26 "Rule 3018 Motion") for an order temporarily allowing your claim in an amount for purposes of
27 voting and serve such motion on the parties listed below so that it is received by **January 21, 2026**.
28 The request for relief sought in such Rule 3018 Motion will be heard at the Confirmation Hearing

1 (as defined below) or other date selected by the Plan Proponents or pursuant to further order of the
2 Court. Rule 3018 Motions that are not timely filed and served in the manner as set forth above will
3 not be considered.

4 6. The Plan Supplement will be filed by the Debtors and the Committee by December
5 19, 2025, which will be served on all parties that have requested special notice in the cases under
6 Bankruptcy Rule 2002, and will be available to review and download for free from the Voting
7 Agent's website at <https://veritaglobal.net/LM> on and after the filing of the Plan Supplement.

8 10. On **January 23, 2026 at 11:00 a.m. (Pacific Time)**, a **status conference**
9 (**"Confirmation Status Conference"**) will be held before the Honorable Charles Novack, United
10 States Bankruptcy Judge to determine the date for the hearing on confirmation of the Plan (the
11 **"Confirmation Hearing"**) and certain other deadlines related to confirmation of the Plan. Counsel
12 and interested parties may appear at the Confirmation Status Conference and Confirmation Hearing
13 in person in Courtroom 215 of the United States Bankruptcy Court, 1300 Clay Street in Oakland,
14 California or via Zoom video or telephone. The Zoom information will be included in each calendar
15 posted weekly, as applicable.

16 7. The Confirmation Hearing may be adjourned from time to time, without further
17 notice. The Plan may be modified in accordance with the Bankruptcy Code, the Federal Rules of
18 Bankruptcy Procedure, the Plan and other applicable law, without further notice, prior to or as a
19 result of the Confirmation Hearing.

20 8. Objections, if any, to the confirmation of the Plan must (a) be in writing; (b) state the
21 name and address of the objecting party and the nature of the claim or interest of such party; (c) state
22 with particularity the basis and nature of any objection; and (d) be filed with the Bankruptcy Court
23 at the address set forth below and served on the following **so that any such objections are received**
24 **no later than January 21, 2026:** (a) Counsel to the LFM Debtors: Keller Benvenuti Kim LLP,
25 Attn: Tobias Keller, David Taylor, Dara Silveira and Thomas Rupp (tkeller@kblkllp.com,
26 dtaylor@kblkllp.com, dsilveira@kblkllp.com, trupp@kblkllp.com), 101 Montgomery St., Suite 1950,
27 San Francisco, CA 94104; (b) counsel to KSMP: Hogan Lovells US LLP, Attn: Richard Wynne,
28 Erin Brady, and Edward McNeilly (richard.wynne@hoganlovells.com,

1 erin.brady@hoganlovells.com, edward.mcneilly@hoganlovells.com); (c) counsel to the
2 Committee: Pachulski Stang Ziehl & Jones LLP, Attn: Debra Grassgreen, Jason Rosell and Steven
3 Golden (dgrassgreen@pszjlaw.com, jrosell@pszjlaw.com, sgolden@pszjlaw.com), One Sansome
4 St., Suite 3430, San Francisco, CA 94104-4436; (d) Office of the United States Trustee, Northern
5 District of California, 450 Golden Gate Avenue, Room 05-0153, San Francisco, CA 94102 (Attn:
6 Jared A. Day) (jared.a.day@usdoj.gov); and (e) all other parties in interest that have filed requests
7 for notice pursuant to Bankruptcy Rule 2002 in the Debtors' chapter 11 cases.

8 9. In accordance with Bankruptcy Rule 3017(a), requests for copies of the Disclosure
9 Statement, the Plan, or the Motion by parties in interest may be made in writing to Debtors' counsel
10 or Verita Global by submitting an inquiry at <https://veritaglobal.net/lm/inquiry>. Copies of the
11 Disclosure Statement and the Plan (along with exhibits to each as they are filed with the Bankruptcy
12 Court) and the Motion are available for review, at no charge, at <https://veritaglobal.net/lm/inquiry>.

13 *[Signature page to follow]*
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1 Dated: December __, 2025

KELLER BENVENUTTI KIM LLP

2

3

By: /s/ DRAFT

4

Tobias S. Keller

David A. Taylor

5

Thomas B. Rupp

6

Counsel to the LFM Debtors

7

8

PACHULSKI STANG ZIEHL & JONES LLP

9

10

By: /s/ DRAFT

11

Debra Grassgreen

John D. Fiero

12

Jason H. Rosell

13

*Counsel to the Official Committee
of Unsecured Creditors*

14

15

HOGAN LOVELLS US LLP

16

17

By: /s/ DRAFT

18

Richard L. Wynne

Erin N. Brady

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Edward J. McNeilly

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Counsel to KS Mattson Partners, LP

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EXHIBIT 3-1

Proposed Form of Ballot (Class 3)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re

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

Debtors.

Case No. 24-10545 CN (Lead Case)

(Jointly Administered)

Chapter 11

In re

KS MATTSON PARTNERS, LP,

Debtor.

**BALLOT FOR ACCEPTING OR REJECTING JOINT CHAPTER 11 PLAN OF LEFEVER
MATTSON, KS MATTSON PARTNERS, LP, AND THEIR AFFILIATED DEBTORS
PROPOSED BY THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS**

CLASS 3-[•] – SECURED LENDER CLAIM

THE VOTING DEADLINE TO ACCEPT OR REJECT THE PLAN IS JANUARY 21, 2026 AT 11:59 P.M. (PACIFIC TIME)
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This Ballot is submitted to you to solicit your vote to accept or reject the *Third Amended Joint Chapter 11 Plan of Liquidation* of LeFever Mattson, KS Mattson Partners, LP, and their affiliated Debtors (as may be amended or modified, the “Plan”), which is being proposed by the above-captioned debtors and debtors-in-possession (the “Debtors”) and the Official Committee of Unsecured Creditors (the “Committee” and, together with the Debtors, the “Plan Proponents”), and which is described in the *Third Amended Disclosure Statement in Support of the Third Amended Joint Chapter 11 Plan of Liquidation* (the “Disclosure Statement”). On December [], 2025, the Bankruptcy Court entered an order approving certain procedures and materials for the solicitation of votes to accept or reject the Plan (the “Solicitation Procedures Order”). Capitalized terms used in this Ballot and the attached instructions that are not otherwise defined have the meanings given to them in the Plan.

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>.

The Disclosure Statement provides information to assist you in deciding how to vote your Ballot. You should review the Plan and Disclosure Statement before you vote. You may wish to seek legal or other professional advice concerning the Plan and your classification and treatment under the Plan.

The Plan may be made binding on you whether or not you vote if the Plan (a) is accepted by the holders of at least two-thirds in amount and more than one-half in number of the claims in each impaired Class of claims who vote on the Plan; (b) otherwise satisfies the applicable requirements of section 1129(a) of the Bankruptcy Code; and (c) the Bankruptcy Court enters an order confirming the Plan. Even if the requisite acceptances are not obtained, however, the Bankruptcy Court may still confirm the Plan if the Bankruptcy Court finds that the Plan (a) provides fair and equitable treatment to, and does not unfairly discriminate against, the Class or Classes rejecting the Plan; and (b) otherwise satisfies the requirements of section 1129(b) of the Bankruptcy Code.

This Ballot is solely for purposes of voting to accept or reject the Plan. This Ballot is not for the purpose of allowance or disallowance of, or distribution on account of, Secured Lender Claims in Class 3.

There are two ways by which you may submit your Ballot: (i) you may submit your Ballot via the Voting Agent's online e-balloting portal (the "E-Balloting Portal") as directed below, or (ii) you may return your Ballot to the Voting Agent via mail, overnight courier, or hand delivery by following the instructions set forth below.

If you have any questions on how to properly complete this Ballot, please contact Verita Global at 1-877-709-4751 (U.S. / Canada), 1-424-236-7231 (International) or submit an inquiry at: <https://veritaglobal.net/lm/inquiry>. Please be advised that Verita Global cannot provide legal or other professional advice.

For your vote to be counted, this Ballot must be properly completed, signed, and returned so that it is *actually received* by the Voting Agent by no later than the Voting Deadline of **11:59 p.m. (Pacific Time) on January 21, 2026. Please submit a Ballot with your vote by one of the following methods:**

<p><u>If Submitting Your Vote Through the E-Balloting Portal:</u></p> <p>Verita Global will accept Ballots if properly completed through the E-Balloting Portal. To submit your Ballot via the E-Balloting Portal,</p> <p>Unique E-Ballot</p> <p>ID#: _____</p> <p>PIN#: _____</p>	<p><u>If by First Class Mail, Overnight Courier or Hand Delivery:</u></p> <p>LeFever Mattson Ballot Processing Center c/o KCC dba Verita 222 N. Pacific Coast Highway, Suite 300 El Segundo, CA 90245</p> <p>A pre-addressed return envelope has been enclosed for your convenience.</p>
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Verita Global's E-Balloting Portal is the sole manner in which Ballots will be accepted via electronic or online transmission. Ballots submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in your electronic Ballot. Please complete and submit an electronic Ballot for each E-Ballot ID# you receive, as applicable.

EXHIBIT 3-2

Proposed Form of Ballot (Class 4)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re LEFEVER MATTSON, a California corporation, <i>et al.</i> , ¹ Debtors.	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11
In re KS MATTSON PARTNERS, LP, Debtor.	

**BALLOT FOR ACCEPTING OR REJECTING JOINT CHAPTER 11 PLAN OF LEFEVER
MATTSON, KS MATTSON PARTNERS, LP, AND THEIR AFFILIATED DEBTORS
PROPOSED BY THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS**

CLASS 4 – TRADE CLAIMS

THE VOTING DEADLINE TO ACCEPT OR REJECT THE PLAN IS JANUARY 21, 2026 AT 11:59 P.M. (PACIFIC TIME)
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This Ballot is submitted to you to solicit your vote to accept or reject the *Third Amended Joint Chapter 11 Plan of Liquidation* of LeFever Mattson, KS Mattson Partners, LP, and their affiliated Debtors (as may be amended or modified, the “Plan”), which is being proposed by the above-captioned debtors and debtors-in-possession (the “Debtors”) and the Official Committee of Unsecured Creditors (the “Committee” and, together with the Debtors, the “Plan Proponents”), and which is described in the *Third Amended Disclosure Statement in Support of the Third Amended Joint Chapter 11 Plan of Liquidation* (the “Disclosure Statement”). On December [], 2025, the Bankruptcy Court entered an order approving certain procedures and materials for the solicitation of votes to accept or reject the Plan (the “Solicitation Procedures Order”). Capitalized terms used in this Ballot and the attached instructions that are not otherwise defined have the meanings given to them in the Plan.

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>.

The Disclosure Statement provides information to assist you in deciding how to vote your Ballot. You should review the Plan and Disclosure Statement. You may wish to seek legal or other professional advice concerning the Plan and your classification and treatment under the Plan.

The Plan may be made binding on you whether or not you vote if the Plan (a) is accepted by the holders of at least two-thirds in amount and more than one-half in number of the claims in each impaired Class of claims who vote on the Plan; (b) otherwise satisfies the applicable requirements of section 1129(a) of the Bankruptcy Code; and (c) the Bankruptcy Court enters an order confirming the Plan. Even if the requisite acceptances are not obtained, however, the Bankruptcy Court may still confirm the Plan if the Bankruptcy Court finds that the Plan (a) provides fair and equitable treatment to, and does not unfairly discriminate against, the Class or Classes rejecting the Plan; and (b) otherwise satisfies the requirements of section 1129(b) of the Bankruptcy Code.

This Ballot is solely for purposes of voting to accept or reject the Plan. This Ballot is not for the purpose of allowance or disallowance of, or distribution on account of, Trade Claims in Class 4.

There are two ways by which you may submit your Ballot: (i) you may submit your Ballot via the Voting Agent's online e-balloting portal (the "E-Balloting Portal") as directed below, or (ii) you may return your Ballot to the Voting Agent via mail, overnight courier, or hand delivery by following the instructions set forth below.

If you have any questions on how to properly complete this Ballot, please contact Verita Global at 1-877-709-4751 (U.S. / Canada), 1-424-236-7231 (International) or submit an inquiry at: <https://veritaglobal.net/lm/inquiry>. Please be advised that Verita Global cannot provide legal or other professional advice.

For your vote to be counted, this Ballot must be properly completed, signed, and returned so that it is *actually received* by the Voting Agent by no later than the Voting Deadline of **11:59 p.m. (Pacific Time) on January 21, 2026. Please submit a Ballot with your vote by one of the following methods:**

<p style="text-align: center;"><u>If Submitting Your Vote Through the E-Balloting Portal:</u></p> <p>Verita Global will accept Ballots if properly completed through the E-Balloting Portal. To submit your Ballot via the E-Balloting Portal,</p> <p style="text-align: center;">Unique E-Ballot</p> <p>ID#: _____</p> <p>PIN#: _____</p>	<p style="text-align: center;"><u>If by First Class Mail, Overnight Courier or Hand Delivery:</u></p> <p>LeFever Mattson Ballot Processing Center c/o KCC dba Verita 222 N. Pacific Coast Highway, Suite 300 El Segundo, CA 90245</p> <p>A pre-addressed return envelope has been enclosed for your convenience.</p>
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Verita Global's E-Balloting Portal is the sole manner in which Ballots will be accepted via electronic or online transmission. Ballots submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in your electronic Ballot. Please complete and submit an electronic Ballot for each E-Ballot ID# you receive, as applicable.

Ballots received after 11:59 p.m. (Pacific Time) on January 21, 2026 will not be counted. Ballots submitted by e-mail or facsimile transmission will not be accepted.

PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Class 4 Claim. For purposes of voting to accept or reject the Plan, the undersigned certifies that the undersigned holds a Trade Claim in Class 4 against the Debtors in the amount set forth below.

Voting Amount: \$ _____

Item 2. Vote on the Plan. The undersigned Holder of a Trade Claim in Class 4 in the amount set forth in Item 1 above hereby votes to:

Check one box only: ☐ **Accept** (vote FOR) the Plan
 ☐ **Reject** (vote AGAINST) the Plan

THE DEBTORS AND THE COMMITTEE RECOMMEND THAT YOU VOTE TO ACCEPT THE PLAN.
--

Item 3. Certifications. By signing this Ballot, the undersigned acknowledges receipt of the Disclosure Statement and the other applicable solicitation materials and certifies that the undersigned is the claimant or has the power and authority to vote to accept or reject the Plan on behalf of the claimant. The undersigned understands that, if this Ballot is otherwise validly executed but is not timely submitted, does not indicate either acceptance or rejection of the Plan or indicates both an acceptance and rejection of the Plan, this Ballot will not be counted.

YOUR RECEIPT OF THIS BALLOT DOES NOT SIGNIFY THAT YOUR CLAIM HAS BEEN OR WILL BE ALLOWED.

<p>Name of Holder: _____ (Print or Type)</p> <p>Signature: _____</p> <p>Name of Signatory: _____</p> <p>Title of Signatory: _____</p> <p>Address: _____</p> <p>Email Address: _____</p> <p>Date Completed: _____</p> <p>If your address or contact information has changed, please note the new information here.</p>

EXHIBIT 3-3

Proposed Form of Ballot (Class 5)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re

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

Debtors.

Case No. 24-10545 CN (Lead Case)

(Jointly Administered)

Chapter 11

In re

KS MATTSON PARTNERS, LP,

Debtor.

**BALLOT FOR ACCEPTING OR REJECTING JOINT CHAPTER 11 PLAN OF
LEFEVER MATTSON, KS MATTSON PARTNERS, AND THEIR AFFILIATED DEBTORS
PROPOSED BY THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

CLASS 5 – INVESTOR CLAIMS

THE VOTING DEADLINE TO ACCEPT OR REJECT THE PLAN IS JANUARY 21, 2026 AT 11:59 P.M. (PACIFIC TIME)
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Why You Are Receiving This Ballot

The above-captioned Debtors and the Official Committee of Unsecured Creditors (the “Committee” and, together with the Debtors, the “Plan Proponents”) have proposed a bankruptcy plan, entitled the *Third Amended Joint Chapter 11 Plan of Liquidation* (as may be amended or modified, the “Plan”) of LeFever Mattson, KS Mattson Partners, and their affiliated Debtors.

You are receiving this Ballot because the Debtors’ records show that you are an “Investor” as defined in the Plan (*see* Plan Exhibit A, number 74) – *i.e.*, a Person or Entity that holds an Investor Claim.

Specifically, an “**Investor Claim**” is defined (at Plan Exhibit A, number 75) as “Claim arising from or relating to an Investment, including, without limitation, (a) all Claims (including any contract or related Claims) based on,

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>.

arising out of, or related to any Investments including the validity, marketing, sale, and issuance thereof; (b) all Claims for fraud, unlawful dividend, fraudulent conveyance, fraudulent transfer, voidable transaction, or other avoidance claims under state or federal law; (c) all Claims arising from or related to the preparation or filing of the Debtors' and/or their affiliates' (including the KSMP Investment Entities') federal, state, local, or other tax returns, forms, and other filings; (d) all Claims based on, arising out of, or related to the misrepresentation of any of the Debtors' or the KSMP Investment Entities' financial information, assets and properties, business operations, or related internal controls; (e) all Claims based on, arising out of, or related to any failure to disclose, or actual or attempted cover up or obfuscation of, any of the wrongful conduct described in the Disclosure Statement, including with respect to any alleged fraud related thereto and undisclosed loans; (f) all Claims based on aiding or abetting, entering into a conspiracy with, or otherwise supporting Investment-related torts committed by the Debtors, the KSMP Investment Entities, or their agents; and (g) any Claims arising from or relating to TIC Interests; *provided that* any and all Equity Interests asserted by a Person or Entity in the Debtors via a Proof of Interest shall be deemed to be an Investor Claim for purposes of classification and distribution under the Plan, without any further notice, motion, complaint, objection, or other action or order of the Court." An "**Investment**" is defined (at Plan Exhibit A, number 73) as "any investment or investment product offered by any Debtor (whether directly or through an agent), including, without limitation, any investments, interests, or other rights with respect to any Debtor that were styled, marketed, or sold as, among others, partnership interests in limited partnerships, TIC Interests, or other interests in any real property (including the purchase or sale of a real property)."

On December [], 2025, the Bankruptcy Court entered an order approving, among other relief, certain procedures and materials for the solicitation of votes to accept or reject the Plan (the "Solicitation Procedures Order"). Capitalized terms used in this Ballot and the attached instructions that are not otherwise defined have the meanings given to them in the Plan.

This Ballot has been sent to you to (1) vote to accept or reject the Plan, (2) elect whether to contribute your Contributed Claims to the Plan Recovery Trust under the Plan, and (3) implement the estimation of your Class 5 Investor Claim for voting purposes only (not for distribution or other purposes under the Plan).

Information to Assist You In Voting and Completing This Ballot

The Plan Summary and the Disclosure Statement provide information to assist you in deciding how to vote on the Plan and how to fill in and complete this Ballot. The Plan Summary and the Disclosure Statement both have been approved by the Bankruptcy Court as containing adequate information required by the Bankruptcy Code. You should review the Plan Summary, the Disclosure Statement, and the Plan before you vote and complete this Ballot. You may wish to seek legal or other professional advice concerning the Plan and your classification and treatment under the Plan.

How Your Vote Impacts Confirmation of the Plan

The Plan may be made binding on you whether or not you vote if the Plan (a) is accepted by the holders of at least two-thirds in amount and more than one-half in number of the claims in each impaired Class of claims who vote on the Plan; (b) otherwise satisfies the applicable requirements of section 1129(a) of the Bankruptcy Code; and (c) the Bankruptcy Court enters an order confirming the Plan. Even if the requisite acceptances are not obtained, however, the Bankruptcy Court may still confirm the Plan if the Bankruptcy Court finds that the Plan (a) provides fair and equitable treatment to, and does not unfairly discriminate against, the Class or Classes rejecting the Plan; and (b) otherwise satisfies the requirements of section 1129(b) of the Bankruptcy Code.

How to Vote

There are two ways by which you may submit your Ballot: (i) you may submit your Ballot via the Voting Agent's online e-balloting portal (the "E-Balloting Portal") as directed below, or (ii) you may return your Ballot to the Voting Agent via mail, overnight courier, or hand delivery by following the instructions set forth below.

If you have any questions on how to properly complete this Ballot, please contact Verita Global at 1-877-709-4751 (U.S. / Canada), 1-424-236-7231 (International) or submit an inquiry at: <https://veritaglobal.net/lm/inquiry>. Please be advised that Verita Global cannot provide legal or other professional advice.

For your vote to be counted, this Ballot must be properly completed, signed, and returned so that it is *actually received* by the Voting Agent by no later than the Voting Deadline of **11:59 p.m. (Pacific Time) on January 21, 2026. Please submit a Ballot with your vote by one of the following methods:**

<p><u>If Submitting Your Vote Through the E-Balloting Portal:</u></p> <p>Verita Global will accept Ballots if properly completed through the E-Balloting Portal. To submit your Ballot via the E-Balloting Portal,</p> <p>Unique E-Ballot</p> <p>ID#: _____</p> <p>PIN#: _____</p>	<p><u>If by First Class Mail, Overnight Courier or Hand Delivery:</u></p> <p>LeFever Mattson Ballot Processing Center c/o KCC dba Verita 222 N. Pacific Coast Highway, Suite 300 El Segundo, CA 90245</p> <p>A pre-addressed return envelope has been enclosed for your convenience.</p>
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Verita Global's E-Balloting Portal is the sole manner in which Ballots will be accepted via electronic or online transmission. Ballots submitted by facsimile, email, or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in your electronic Ballot. Please complete and submit an electronic Ballot for each E-Ballot ID# you receive, as applicable.

Ballots received after 11:59 p.m. (Pacific Time) on January 21, 2026 will not be counted. Ballots submitted by e-mail or facsimile transmission will not be accepted.

Ballot for Voting and Estimation of Investor Claim Solely For Voting Purposes

This Ballot is for purposes of (1) voting to accept or reject the Plan, (2) electing whether to contribute your Contributed Claims to the Plan Recovery Trust under the Plan, and (3) establishing the estimated amount(s) of the voting Investor's Class 5 Investor Claim solely for tabulating the voting on the Plan, and no other purposes.

Your Investor Claim amount for voting purposes, as described herein, is solely for purposes of tabulating your vote to accept or reject the Plan, and is not for the purpose of allowance of your Investor Claim for purposes of receiving distributions pursuant to the Plan. The allowed amount of your Investor Claim for distribution purposes will be determined by a final order of the Bankruptcy Court after notice and a hearing.

PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Class 5 Investor Claim for Voting Purposes Only. For purposes of (1) voting to accept or reject the Plan and (2) establishing the estimated amount of the voting Investor's Investor Claim for voting purposes only, the undersigned certifies that the undersigned holds an Investor Claim in Class 5 against the Debtor(s) listed below in the amounts set forth below.

THE AMOUNT LISTED BELOW IS FOR VOTING PURPOSES ONLY.

Voting Amount: \$ _____

Item 2. Vote on the Plan. The undersigned Holder of an Investor Claim in Class 5 in the amount set forth in Item 1 above hereby votes to:

Check one box only: ☐ **Accept** (vote FOR) the Plan
☐ **Reject** (vote AGAINST) the Plan

THE DEBTORS AND THE COMMITTEE RECOMMEND THAT YOU VOTE TO ACCEPT THE PLAN.

Item 3. Optional Opt-Out of Contributing Contributed Claims. It is optional for you to elect to contribute to the Plan Recovery Trust in exchange for a Pro Rata Distribution of Class C Plan Recovery Trust Units, any and all of your Contributed Claims (defined in **Exhibit A** to the Plan).

The claims to be contributed to the Plan Recovery Trust by the particular Investor, if it becomes a Contributing Claimant, are all of his, hers, or its **legal claims and causes of action, potential and actual, known and unknown, in any way related or connected to the Debtors, their predecessors, successors, and affiliates, and those parties listed as "Excluded Parties" in Exhibit B to the Plan**, that the Investor has against any person or entity other than the Debtors. Such claims to be transferred include, without limitation, claims and causes of action related to the marketing, sale, and issuance of any investments connected to the Debtors; fraudulent transfers, voidable transactions, and other similar avoidance claims under state or federal law; any misrepresentation of the Debtors' finances and businesses; any cover-up of fraud or other wrongdoing by the Debtors or related parties discussed in the Disclosure Statement; and aiding or conspiring with the Debtors or agents to commit wrongful acts.

If you ***vote to accept the Plan and do not opt out of the Contributed Claim Election***, you will be deemed to contribute your Contributed Claims to the Plan Recovery Trust (unless your claims are listed on the Schedule of Disclaimed Contributed Claims, in which case you will not have contributed your claims under the Plan). If you ***elect to opt out by checking the box below***, you will not contribute, and shall retain, all such claims and causes of action (if any) described above and in the Plan.

☐ **I elect to OPT-OUT.**

THE DEBTORS AND THE COMMITTEE RECOMMEND THAT YOU DO NOT OPT-OUT.

Item 4. Certifications. By signing this Ballot, under penalty of perjury, the undersigned acknowledges and certifies: (i) receipt of the Disclosure Statement and the other applicable solicitation materials; and (ii) that the undersigned is the claimant or has the power and authority to vote to accept or reject the Plan and make the other statements/elections set forth in Items 1-3 above on behalf of the claimant. The undersigned understands that, if this Ballot is otherwise validly executed but is not timely submitted, does not indicate either acceptance or rejection of the Plan or indicates both an acceptance and rejection of the Plan, this Ballot will not be counted.

YOUR RECEIPT OF THIS BALLOT DOES NOT SIGNIFY THAT YOUR CLAIM HAS BEEN OR WILL BE ALLOWED.

<p>Name of Holder: _____</p> <p>Signature: _____</p> <p>Name of Signatory: _____</p> <p>Title of Signatory: _____</p> <p>Address (if different than above): _____</p> <p>_____</p> <p>Email Address: _____</p> <p>Date Completed: _____</p>
--

If your address or contact information has changed, please note the new information here.

EXHIBIT 4

Form of Investor Claim Settlement Offer Letter

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

In re LEFEVER MATTSON, a California corporation, <i>et al.</i> , Debtors.	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11
In re KS MATTSON PARTNERS, LP, Debtor.	INVESTOR CLAIM SETTLEMENT OFFER LETTER

This Investor Claim Settlement Offer Letter (the “Letter Agreement”), dated as of December __, 2025, is made by and among the above-captioned debtors (the “Debtors”), the Official Committee of Unsecured Creditors (the “Committee” and together with the Debtors, the “Plan Proponents”), and _____ (“Investor”).

This Agreement is being sent to you in accordance with the Bankruptcy Court’s Solicitation Procedures Order [Docket No. ____], a copy of which is enclosed herewith.

On December __, 2025, the Bankruptcy Court entered the Solicitation Procedures Order authorizing the Plan Proponents to solicit votes to accept or reject the *Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. ____] (the “Plan”). The Bankruptcy Court will hold a status conference on January 23, 2026 at 11:00 a.m. (Pacific Time) to schedule a hearing to consider confirmation of the Plan. However, there is no guarantee that the Bankruptcy Court will confirm the Plan.

The Plan contemplates that, in accordance with applicable Ponzi scheme case law, Investor claims will be “netted” to make sure Investors are treated as fairly as possible under the circumstances. Specifically, each Investor will receive (a) a claim for money (or value of property) it invested in the Debtors over time *less* any returns of principal *less* monthly distributions the Investor received over the seven (7) years prior to September 12, 2024 (the “Tranche 1 Claim”) and (b) a claim for the monthly distributions deducted in calculating the Tranche 1 Claim (the “Tranche 2 Claim”).

The Plan provides that Investors will first receive their *pro rata* distribution of the Plan Recovery Trust’s available assets on account of their Tranche 1 Claim. After each Investor’s Tranche 1 Claim is paid in full, Investors will then receive their *pro rata* distribution of available assets on account of their Tranche 2 Claim.

The purpose of this Letter Agreement is to consensually resolve your Tranche 1 Claim and Tranche 2 Claim. This will facilitate an initial distribution to you as soon as reasonably possible after confirmation of the Plan. **Please note that any resolution of your Tranche 1 Claim and Tranche 2 Claim pursuant to this Letter Agreement is conditioned on confirmation of the Plan.**

The table below was prepared by the Committee's financial advisors (PwC) and sets forth the Committee's calculation of your proposed Tranche 1 Claim and Tranche 2 Claim. Attached hereto as Schedule 1 is a detailed calculation of the amounts set forth in the table below.

Proposed Investor Claim	
Proposed <u>Tranche 1</u> Claim:	\$(X)
Proposed <u>Tranche 2</u> Claim:	\$(X)

If you **ACCEPT** the above calculated Investor Claim for purposes of distribution under the Plan, then you must sign this Letter Agreement below and return it via email to LMCommittee@pszjlaw.com or by mail, so it is received by January 21, 2026 at 11:59 p.m. (Pacific Time) to:

Pachulski Stang Ziehl & Jones LLP
Attention: Brooke Wilson
One Sansome Street, Suite 3430
San Francisco, CA 94104

If you **DO NOT ACCEPT** the above calculated Investor Claim, you do not have to do anything. However, if you would like to attempt to meet and confer with the Committee and attempt to consensually resolve the amount of your Investor Claim, please email LMCommittee@pszjlaw.com and we will schedule a time to meet with you via Zoom as soon as reasonably possible.

Sincerely,

Brooke Wilson

PACHULSKI STANG ZIEHL & JONES LLP
One Sansome Street, Suite 3430
San Francisco, CA 94104

Counsel to the Official Committee of Unsecured Creditors

I, [NAME], **ACCEPT** THE PROPOSED INVESTOR CLAIM AMOUNT SET FORTH IN THIS LETTER.

By signing below, I declare under penalty of perjury, to the best of my knowledge, that the information contained in Schedule 1 is true and correct and discloses all Extraordinary Withdrawals.

Name: _____

Signature: _____

Date: _____

Schedule 1 to Investor Claim Settlement Offer Letter

Detailed Calculation of Your Investor Claim

KEY TERMS	
Term	Definition
Investor Name	The name of the Person or Entity that asserts an Investor Claim (as defined in the Plan) against a Debtor.
Claim No.	Refers to the unique number assigned by the Debtors to your filed Proof of Claim, Proof of Interest, or scheduled ownership interest set forth on the <i>Omnibus List of Equity Security Holders</i> [Docket No. 353].
Debtor	Identifies the specific Debtor or KSMP Investment Entity your Investor Claim is asserted against.
Petition Date	September 12, 2024.
Ponzi Start Date	September 12, 2017.
Amount Invested	<p>The actual amount of money contributed by or on behalf of an Investor, including the value of any initial contributions made through a 1031 exchange intermediary, retirement rollover contributions from another financial institution, or direct cash contributions (via check, wire, ACH).</p> <p>This amount does not include (a) appreciated values shown on IRA statements, (b) investment gains reported by self-directed IRA custodians, or (c) appreciated amounts reflected in rollover agreements or investment summaries.</p>
Extraordinary Withdrawals Prior to Ponzi Start Date	Transfers to an Investor <i>before</i> the Ponzi Start Date that constitute a return of principal (e.g., proceeds from cash-out refinancings or property sales prior to the Ponzi Start Date). These transfers reduce the Total Amount Invested for purposes of calculating your Investor Claim.
Total Amount Invested	Amount Invested less Extraordinary Withdrawals Prior to Ponzi Start Date. This is the starting point for calculating your Investor Claim.
Prepetition Ponzi Distributions	Payments made to an Investor between the Ponzi Start Date and the Petition Date, which represent distributions and/or other regular payments, including: (a) monthly distributions received, (b) periodic distributions posted to an IRA account, and (c) any regularly scheduled payments between the Ponzi Start Date and the Petition Date.
Extraordinary Withdrawal After Ponzi Start Date	Large or irregular transfers to an Investor between the Ponzi Start Date and the Petition Date that represent a return of principal, including, (a) proceeds from cash-out from refinancings, (b) proceeds from property sales, and (c) other substantial one-time payments. These transfers are included in your Total Prepetition Ponzi Payments.
Total Prepetition Ponzi Payments	The <i>sum</i> of: (a) Prepetition Ponzi Distributions and (b) Extraordinary Withdrawals After Ponzi Start Date. This total is netted against Total Amount Invested to determine your Proposed Tranche 1 Claim.
Proposed Tranche 1 Claim	Total Amount Invested minus Total Prepetition Ponzi Payments (or \$0 if negative). This amount will not be less than \$0.
Proposed Tranche 2 Claim	Equal to the amount of Prepetition Ponzi Distributions. Investors will only receive a recovery on account of their Tranche 2 Claims after all Tranche 1 Claims are paid in full.

			A	B	C = A + B	D	E	F = D + E
Investor Name	Claim No.	Debtor	Amount Invested	Extraordinary Withdrawals Prior to Ponzi State Date	Total Amount Invested	Prepetition Ponzi Distributions	Extraordinary Withdrawals After Ponzi Start Date	Total Prepetition Ponzi Payments
TOTAL								
Proposed Tranche 1 Claim (Tranche 1 Claim = C – D – E)								
Proposed Tranche 2 Claim (Tranche 2 Claim = D)								

EXHIBIT 5

Vote Tabulation/Estimation Procedures

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VOTE TABULATION/ESTIMATION PROCEDURES

Applicable to Class 3 Secured Lender Claims and Class 4 Trade Claims: Solely for the purpose of voting to accept or reject the Plan and not for purposes of allowance of, or distribution on account of, a Claim in Classes 3 and 4, each Claim within such Class shall be temporarily allowed in an amount equal to (i) the amount asserted in a timely filed proof of Claim, or, if no timely proof of Claim has been filed, (ii) the liquidated, non-contingent, undisputed amount of such Claim set forth in the Schedules,¹ subject to the following exceptions and/or conditions:

- a. If a Claim is deemed Allowed pursuant to the Plan, such Claim shall be Allowed for voting purposes in the deemed Allowed amount set forth in the Plan.
- b. If a Claim has been estimated for voting purposes or otherwise allowed for voting purposes by Order of the Court, such Claim shall be allowed in the amount so estimated or allowed by the Court for voting purposes only with respect to the Plan, and not for purposes of allowance or distribution, unless otherwise provided by Order of the Court.
- c. If an objection to, or request for estimation of, a Claim has been filed, such Claim shall be temporarily disallowed or estimated for voting purposes only with respect to the Plan and not for purposes of allowance or distribution, except to the extent and in the manner as may be set forth in such objection or request for estimation.
- d. If the voting amount of a Claim has been established by a stipulation, settlement, or other agreement filed by the Plan Proponents on or before the Voting Deadline, such Claim shall be allowed for voting purposes only with respect to the Plan, and not for purposes of allowance or distribution, in the stipulation, settled, or otherwise agreed-to amount.
- e. If a Claim was listed in the Debtors' filed Schedules in an amount that is liquidated, non-contingent, and undisputed, and a proof of Claim was not filed by the Voting Record Date, such Claim is allowed for voting in the liquidated, non-contingent, undisputed amount set forth in the Debtors' filed Schedules.
- f. If a Claim, for which a proof of Claim was timely filed, is listed as contingent, unliquidated, or disputed in part, such Claim is temporarily allowed in the amount that is liquidated, non-contingent, and undisputed for voting purposes only, and not for purposes of allowance or distribution.
- g. If a Claim was timely filed for unknown or undetermined amounts, or is wholly unliquidated, or contingent (as determined on the face of the claim or after a reasonable review of the supporting documentation by the Plan Proponents and/or Voting Agent) and such claim has not been allowed, such Claim shall be temporarily allowed for voting purposes only, and not for purposes of allowance or distribution, at \$1.00.
- h. Claims filed for \$0.00 are not entitled to vote.

¹ Includes all of the Debtors' filed Schedules of Assets and Liabilities, Statements of Financial Affairs, Omnibus List of Equity Security Holders, and any and all amendments thereof.

1 j. For purposes of the numerosity requirement of section 1126(c) of the Bankruptcy
2 Code, separate Claims held by a single creditor in a particular Class shall be aggregated as
3 if such creditor held one Claim against the Debtors in such Class, and the votes related to
4 such Claims shall be treated as a single vote to accept or reject the Plan.

5 k. Notwithstanding anything to the contrary contained herein, any creditor who has
6 filed or purchased duplicate Claims within the same Voting Class shall be provided with
7 only one Solicitation Package and one ballot for voting a single Claim in such Class,
8 regardless of whether the Debtors have objected to such duplicate Claims.

9 l. If a Claim has been amended by a later Claim that is filed on or prior to the Voting
10 Record Date, the later filed amending Claim shall be entitled to vote in a manner consistent
11 with these tabulation rules, and the earlier filed Claim shall be disallowed for voting
12 purposes, regardless of whether the Debtors have objected to such amended claim. Except
13 as otherwise ordered by the Court, any amendments to a Claim after the Voting Record Date
14 shall not be considered for purposes of these tabulation rules.

15 m. Any parties solely in relation to Claims or Interests that are not Investor Claims
16 (“Non-Investor Claims”) may file a motion pursuant to Bankruptcy Rule 3018(a) for an order
17 temporarily allowing such party’s Non-Investor Claim in a different amount for purposes of
18 voting to accept or reject the Plan (a “Non-Investor Rule 3018 Motion”). Any Non-Investor
19 Rule 3018 Motion must be filed and served on the Plan Proponents so as to be received by
20 **January 21, 2026**; and any objections to any Non-Investor Rule 3018 Motion must be filed
no later than **January 28, 2026**. If any objections are filed to the Non-Investor Rule 3018
Motion, the Non-Investor Rule 3018 Motion will be heard at the Confirmation Hearing or
any later date selected by the Plan Proponents.

16 n. With respect to Class 3 Secured Lender Claims, if a Holder of a Class 3 Claim is paid
17 in full between the Voting Record Date and the Confirmation Date, the Holder’s Class 3
18 vote on the Plan will not be counted. The Plan Proponents may file any claim objections
19 against a Secured Lender Claim for Plan voting purposes no later than 14 days before the
20 Confirmation Hearing, with any responses by the applicable Secured Lenders due no later
than 7 days before the Confirmation Hearing, with a hearing to be held on any unresolved
objections at the Confirmation Hearing or a later date selected by the Plan Proponents. The
Plan Proponents may enter into stipulations with Secured Lenders allowing their Class 3
Claims for voting purposes.

21 **Applicable to Class 5 (Investor Claims):**

- 22 • Claims of Investors in the Debtors’ enterprise will be estimated solely for voting
23 purposes in the amount set forth in Item 1 of the Investors’ Class 5 Ballot (the “Proposed
24 Claim Amount(s)”), which is the proposed Investor Tranche 1 Claim for such Investor.
In accordance with the Plan and Ninth Circuit law, the Proposed Claim Amount is
calculated as:
 - 25 ○ the actual amount of money contributed by or on behalf of an Investor,
26 including the value of any initial contributions made through a 1031 exchange
27 intermediary, retirement rollover contributions from another financial
28 institution, or direct cash contributions (via check, wire, ACH);

- *less* all transfers to an Investor before September 12, 2024 that represent a return of principal, including (i) proceeds from cash-out refinancings, (ii) proceeds from property sales, and (iii) other substantial one-time payments;
- *less* Prepetition Ponzi Distributions.
- Notwithstanding the above, if an Investor Tranche 1 Claim is calculated as equal to \$0.00, such Investor's Proposed Claim Amount shall be temporarily allowed for voting purposes only, and not for purposes of allowance or distribution, at \$1.00.
- The Plan Proponents may enter into stipulations with Investors allowing their claims for voting purposes.

General Rules for Counting Votes to Accept or Reject Plan:

In tabulating the Ballots, the following additional procedures will apply:

1. Any Ballot that is properly completed, executed, and timely returned to the Balloting Agent, but does not indicate the acceptance or rejection of the Plan, or indicates both, will not be counted.
2. If a party casts more than one Ballot voting the same claim or interest before the Voting Deadline, the last properly executed Ballot received before the Voting Deadline will be deemed to reflect the voter's intent and, thus, will supersede any prior Ballots.
3. Parties will be required to vote all of their claims or interests under the Plan either to accept or reject the Plan and may not split their votes.
4. Where any portion of a single claim has been transferred to a transferee, all holders of any portion of such single claim will be (i) treated as a single creditor for purposes of the numerosity requirements in section 1126(c) of the Bankruptcy Code (and for the other voting and solicitation procedures set forth herein) and (ii) required to vote every portion of such claim collectively either to accept or reject the Plan.
5. In the event that a Ballot or a group of Ballots within a Class received from a single party partially rejects and partially accepts the Plan, such Ballots will not be counted.