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 of Unsecured Creditors*

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

In re
 LEFEVER MATTSON,
 a California corporation, *et al.*,
 Debtors.

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

In re
 KS MATTSON PARTNERS, LP,
 Debtor.

**SECOND *EX PARTE* APPLICATION OF
 THE OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS FOR
 ENTRY OF AN ORDER PURSUANT TO
 BANKRUPTCY RULE 2004
 AUTHORIZING ORAL EXAMINATION
 OF AND PRODUCTION OF
 DOCUMENTS BY BMO BANK, N.A.;
 DECLARATION OF GILLIAN N.
 BROWN, ESQ.**

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the
 above-captioned chapter 11 bankruptcy cases (the “Cases”) hereby files this *ex parte* application
 (the “Application”) under Federal Rule of Bankruptcy Procedure 2004 (“Rule 2004”) and Local
 Bankruptcy Rule 2004-1 (“Local Rule 2004-1”) for entry of an order authorizing the Committee to
 issue a subpoena to **BMO Bank, N.A. (“BMO”)**



1 The Committee's proposed subpoena will provide that BMO shall (a) complete its
2 production, by **January 7, 2026**, of documents responsive to the Requests for Production (the
3 "Requests") set forth substantially in the form attached hereto as **Exhibit 1**, and (b) provide oral
4 testimony (the "Oral Testimony"), on a mutually agreed date no later than **January 30, 2026**
5 (unless the Committee and BMO agree to extend that date) relating to (i) BMO's search for and
6 possession, custody, or control of documents responsive to the Requests; and (ii) the subject
7 matter of the Requests.

8 **I. PRELIMINARY STATEMENT**

9 As set forth in the First-Day Declaration of Bradley Sharp, the Chief Restructuring Officer
10 of Debtor LFM and its affiliated debtors and debtors in possession (together, the "LFM Debtors"),
11 Kenneth Mattson – one of LFM's founders and former principal - "appears to have used LeFever
12 Mattson to facilitate a years-long campaign of self-serving transactions, many of which were not
13 recorded in the books and records of the LFM Debtors or any of their associated LPs or LLCs
14 (collectively, the "Self-Serving Transactions")."¹ The Committee's professionals have been
15 conducting an investigation (the "Committee Investigation") into the Self-Serving Transactions,
16 and other potential claims and causes of action that may be asserted against non-Debtors.

17 The Committee understands that Mr. Mattson's wife, Stacy Mattson, holds or held bank
18 accounts in her name at BMO, including at least one account ending with -5063 (collectively, the
19 "Accounts") that may have been used to facilitate, among other things, Mattson Transactions that
20 have defrauded general unsecured creditors in these Cases. Ms. Mattson herself was a 49% owner
21 in Debtor KSMP. Accordingly, the Committee requests the issuance of a subpoena compelling
22 BMO to produce all relevant requested documents relating to the Accounts. A proposed order
23 authorizing a 2004 Examination of BMO is attached hereto as **Exhibit 1**.

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27 ¹ See Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions [Docket No. 5]
28 (the "First-Day Decl."), ¶ 27.

1 **II. BACKGROUND OF THE BANKRUPTCY CASES**

2 Over the course of two months in 2024,² each of the LFM Debtors filed a voluntary
3 petition for relief in this Court under chapter 11 of the Bankruptcy Code. The United States
4 Trustee appointed the Committee in the LFM Debtors' bankruptcy cases on October 9, 2024. *See*
5 Docket No. 135. On November 1, 2024, the Court granted the application of the Committee in the
6 LFM Debtors' bankruptcy cases to employ Pachulski Stang Ziehl & Jones LLP ("PSZJ") as its
7 counsel, effective as of October 13, 2024. *See* Docket No. 250. On November 25, 2024, the United
8 States Trustee filed an amended Committee appointment notice. *See* Docket No. 368.

9 On November 22, 2024, an involuntary chapter 11 petition was filed against KSMP,
10 commencing Case No. 24-10715 (Bankr. N.D. Cal.). After more than six months of contested
11 proceedings, on June 6, 2025, KSMP consented to the entry of a stipulated order for relief in the
12 involuntary case, which order was entered by the Court on June 9, 2025. *See* KSMP Docket No.
13 131. The Court also appointed Robbin L. Itkin as the Responsible Individual in the KSMP chapter
14 11 case, effective as of June 16, 2025. *See* Docket No. 172.

15 KSMP's chapter 11 case is being jointly administered, for procedural purposes only, with
16 those of the LFM Debtors. *See* Docket No. 1887. On August 26, 2026, the United States Trustee
17 expanded the appointment of the Committee to include the chapter 11 case of KSMP. *See* Docket
18 No. 2104.

19 **III. JURISDICTION**

20 This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§
21 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before
22 this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought
23 herein are §§ 1103 and 1109(b) of the Bankruptcy Code, and Rule 2004.

24 **IV. RELIEF REQUESTED**

25 The Committee respectfully requests that the Court enter an *ex parte* order authorizing the
26 Committee to issue a subpoena requiring BMO to (a) complete its production, by **January 7**,

27

28 ² The LFM Debtors filed bankruptcy petitions on August 6, 2024; September 12, 2024; and October 2, 2024
(collectively, the "Petition Dates").

1 2026, of documents responsive to the Requests set forth substantially in the form attached hereto
2 as **Exhibit 1**, and (b) provide Oral Testimony, on a mutually agreed date no later than **January**
3 **30, 2026** (unless the Committee and BMO agree to extend that date) relating to (i) BMO's search
4 for and possession, custody, or control of documents responsive to the Requests; and (ii) the
5 subject matter of the Requests.

6 **IV. BASIS FOR RELIEF**

7 Local Rule 2004-1 provides as follows: "The Clerk may issue on behalf of the Court, ex
8 parte and without notice, orders granting applications for examination of an entity pursuant to
9 Bankruptcy Rule 2004(a)."³ The Committee brings this Application *ex parte* pursuant to Local
10 Rule 2004-1 seeking an order without need for a hearing. The Committee understands that BMO
11 reserves the right to interpose objections to the underlying document requests after the issuance of
12 the subpoena. However, objections to the underlying document requests are not grounds to oppose
13 or delay the granting of this Application.

14 Rule 2004(a) provides that "[o]n motion of any party in interest, the court may order the
15 examination of any entity."⁴ Rule 2004 is primarily used for "revealing the nature and extent of
16 the bankruptcy estate, and for discovering assets, examining transactions, and determining whether
17 wrongdoing has occurred."⁵

18 Pursuant to Rule 2004(b), a party in interest may seek both document and oral discovery
19 related to "acts, conduct, or property or to the liabilities and financial condition of the debtor, or to
20 any matter which may affect the administration of the debtor's estate, or to the debtor's right to a
21 discharge."⁶ Under Rule 2004(c), the "attendance of an entity for examination and for the
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23 ³ L.B.R. 2004-1(a).

24 ⁴ Fed. R. Civ. P. 2004(a).

25 ⁵ *In re Kelton*, 389 B.R. 812, 820 (Bankr. S.D. Ga. 2008); *see also In re Lufkin*, 255 B.R. 204, 208 (Bankr. E.D. Tenn.
26 2000) (purpose of Rule 2004 is to "determine the condition, extent, and location of the debtor's estate in order to
27 maximize distribution to unsecured creditors"); *In re Bennett Funding Grp., Inc.*, 203 B.R. 24, 28 (Bankr. N.D.N.Y.
1996) (purpose of Rule 2004 is to assist in "revealing the nature and extent of the estate, and to discover assets of the
debtor which may have been intentionally or unintentionally concealed").

28 ⁶ Fed. R. Civ. P. 2004(b).

1 production of documents . . . may be compelled as provided in Rule 9016 for the attendance of a
2 witness at a hearing or trial.”⁷ Federal Rule of Bankruptcy Procedure (“Bankruptcy Rule”) 9016
3 makes Rule 45 of the Federal Rules of Civil Procedure (governing subpoenas) applicable in cases
4 under the Bankruptcy Code. Unlike discovery under the Federal Rules of Civil Procedure (the
5 “Civil Rules”), discovery under Rule 2004 can be a “pre-litigation discovery device.”⁸ As such, a
6 Rule 2004 motion need not be tied to specific factual allegations at issue between parties.⁹
7 Moreover, the scope of a Rule 2004 oral examination is broader than that of discovery under the
8 Civil Rules or the Bankruptcy Rules governing adversary proceedings.¹⁰ In fact, courts have
9 recognized that Rule 2004 examinations may be “broad” and “unfettered,” and can legitimately be
10 in the nature of a “fishing expedition.”¹¹

11 Whether to allow the requested discovery rests within the sound discretion of the Court.¹²
12 Bankruptcy courts may allow a Rule 2004 examination of “third parties who have had dealings
13 with the debtor,”¹³ “to allow inquiry into the debtor’s acts, conduct or financial affairs so as to
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16 ⁷ Fed. R. Civ. P. 2004(c).

17 ⁸ *In re Wilson*, 413 B.R. 330, 336 (Bankr. E.D. La. 2009).

18 ⁹ *In re Symington*, 209 B.R. 678, 683 (Bankr. D. Md. 1997) (Bankruptcy Rule 2004 permits “examination of any party
19 without the requirement of a pending adversary proceeding or contested matter”).

20 ¹⁰ *In re Ecam Publ’ns, Inc.*, 131 B.R. 556, 559 (Bankr. S.D.N.Y. 1991); *see also In re Drexel Burnham Lambert Grp.,*
21 *Inc.*, 123 B.R. 702, 711 (Bankr. S.D.N.Y. 1991) (“[T]he scope of a Rule 2004 examination is very broad. Rule 2004
discovery is broader than discovery under the Federal Rules of Civil Procedure.”).

22 ¹¹ *In re Subpoena Duces Tecum & Ad Testificandum Pursuant to Fed. R. Bankr. P. 2004*, 461 B.R. 823, 829 (Bankr.
23 C.D. Cal. 2011) (citation omitted); *see also In re Countrywide Home Loans, Inc.*, 384 B.R. 373, 400 (Bankr. W.D. Pa.
2008); *In re Bennett Funding Grp.*, 203 B.R. at 28 (purpose of Rule 2004 is to assist in “revealing the nature and extent
24 of the estate, and to discover assets of the debtor which may have been intentionally or unintentionally concealed”); *In*
re Valley Forge Plaza Assocs., 109 B.R. 669, 674 (Bankr. E.D. Pa. 1990).

25 ¹² *See, e.g., In re Hammond*, 140 B.R. 197, 200 (S.D. Ohio 1992).

26 ¹³ *In re Fearn*, 96 B.R. 135, 138 (Bankr. S.D. Ohio 1989); *see also In re W&S Invs., Inc.*, No. 91-35830, 1993 U.S.
27 App. LEXIS 2231, at *5-6 (9th Cir. Jan. 28, 1993) (unpublished disposition) (Rule 2004 is a “broadly construed
28 discovery device which permits any party in interest in a bankruptcy proceeding to move for a court order to examine
any entity...,” the “scope of inquiry permitted under a Rule 2004 examination is generally very broad and can
‘legitimately be in the nature of a ‘fishing expedition.’”) (citation omitted).

1 discover the existence or location of assets of the estate,”¹⁴ “unearthing frauds,”¹⁵ or to assist in
2 recovering assets for the benefit of a debtor’s creditors.¹⁶

3 In addition, section 105(a) of the Bankruptcy Code authorizes the Court to “issue any
4 order . . . that is necessary or appropriate to carry out the provisions of this title.”¹⁷ The proposed
5 discovery will, among other things, assist the Committee to fulfill its statutory duty to “investigate
6 the acts, conduct, assets, liabilities, and financial condition of the debtor.”¹⁸ The relief requested in
7 this Application will not reduce or expand the substantive rights of any party to object to or
8 modify the information requested by the Committee.

9 Here, the requested relief is well within the scope of Rule 2004. The Committee seeks to
10 maximize the amount of creditors’ recoveries in this Cases. As such, the Committee needs the
11 information from BMO pertaining to the potential flow of funds from any illegal activity through
12 the Accounts.

13 **V. NO PRIOR REQUEST**

14 No prior request for the relief sought in this Application has been made to this or any other
15 Court.

16 **VI. NOTICE**

17 Local Rule 2004-1 provides that this Application can be brought “ex parte and without
18 notice.” L.B.R. 2004-1(a). Nevertheless, notice of this Application will be provided to (a) BMO at
19 subpoena.processing@bmo.com and mancy.pendergrass@bmo.com – via email; (b) the Office of
20 the United States Trustee – via ECF; (c) counsel to the Debtors – via ECF; and (d) all other ECF
21 recipients.

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24 ¹⁴ *In re Dinubilo*, 177 B.R. 932, 940 (E.D. Cal. 1993).

25 ¹⁵ *Dynamic Fin. Corp. v. Kipperman (In re N. Plaza, LLC)*, 395 B.R. 113, 122 n.9 (S.D. Cal. 2008) (citations omitted).

26 ¹⁶ *See In re Vantage Petroleum Corp.*, 34 B.R. 650, 651 (Bankr. E.D.N.Y. 1983) (allowing discovery under Rule 2004
to help the debtor “discover and recover assets for benefit of creditors of the debtor”).

27 ¹⁷ 11 U.S.C. § 105(a).

28 ¹⁸ *Id.* § 1103(c)(2).

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EXHIBIT 1
Requests for Production of Documents

DEFINITIONS

1. “ALL” shall be construed as encompassing “EACH” and “ANY”.
2. “ANY” shall be construed as encompassing “EACH” and “ALL”.
3. “BMO” means BMO Bank, N.A., and its agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.
4. “COMMITTEE” means the Official Committee of Unsecured Creditors appointed in the CHAPTER 11 CASES.
5. “COMMUNICATION” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
6. “CONCERNING” means relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, approving, authorizing, constituting, describing, identifying, referring to, referencing, discussing, indicating, connected with or otherwise pertaining in ANY way, in whole or in part, to the subject matter being referenced.
7. “DOCUMENT” is synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS.
8. “EACH” shall be construed as encompassing “ALL” and “ANY”.
9. “ENTITY” shall have the meaning ascribed to such term in 11 U.S.C. § 101(15).
10. “IDENTIFY”
 - a. *With respect to PERSONS:* When referring to a PERSON, “to identify” means to give, to the extent known, the PERSON’s full name, present or last known address; and when referring to a natural person, additionally, the present or last known place of employment. Once a PERSON has been identified in

1 accordance with this definition, only the name of that PERSON need be listed in
2 response to subsequent discovery requesting the IDENTIFICATION of that person.

3 b. *With respect to DOCUMENTS:* When referring to DOCUMENTS, “to
4 identify” means to give, to the extent known, the (i) type of DOCUMENT; (ii)
5 general subject matter; (iii) date of the DOCUMENT; and (iv) author(s),
6 addressee(s) and recipient(s). In the alternative, YOU may produce the
7 DOCUMENTS, together with identifying information sufficient to satisfy Federal
8 Rule of Civil Procedure 33(d).

- 9 11. “INCLUDING” means “including, without limitation” and “including, but not limited to”.
- 10 12. “STACY MATTSON” means Stacy Mattson and her agents, accountants, financial
11 advisors, attorneys, employees, representatives, and/or family members (including, but not
12 limited to, Kenneth Mattson).
- 13 13. “PERSON” is any natural person, juridical person, or any legal ENTITY, including,
14 without limitation, any business, religious, or governmental ENTITY or association
- 15 14. “REQUESTS” means the Requests for Production set forth below.
- 16 15. “YOU” and “YOUR” means BMO and its agents, accountants, financial advisors,
17 attorneys, employees, officers, directors, direct or indirect shareholders, members,
18 representatives, affiliates, subsidiaries, predecessors, and/or successors.

19 **INSTRUCTIONS**

- 20 A. Unless otherwise specified, the REQUESTS seek DOCUMENTS dated or created on and
21 after **August 6, 2013**.
- 22 B. YOUR responses to the REQUESTS are subject to ALL applicable Federal Rules of
23 Bankruptcy Procedure and this Court’s Local Rules.
- 24 C. Please bates number EACH page of EACH DOCUMENT that YOU produce.
- 25 D. YOU are required to conduct a thorough investigation and produce ALL DOCUMENTS in
26 YOUR possession, custody, and control.
- 27 E. In the REQUEST, the use of the singular form of ANY word includes the plural and vice
28 versa. The words “and” and “or” shall both be conjunctive and disjunctive.

- 1 F. If YOU are unable to produce DOCUMENTS responsive to ANY REQUEST but
2 DOCUMENTS responsive to the REQUEST exist, provide a written DOCUMENT
3 containing the following information:
- 4 1. The date of the DOCUMENT;
 - 5 2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
 - 6 3. The name, address, telephone number and title of the author(s) of the
7 DOCUMENT;
 - 8 4. The name, address, telephone number and work title of EACH recipient of the
9 DOCUMENT;
 - 10 5. The number of pages in the DOCUMENT;
 - 11 6. The document control number, if ANY;
 - 12 7. The present location(s) of the DOCUMENT and the name, address and telephone
13 number of the person(s) who has/have possession of the DOCUMENT;
 - 14 8. A specific description of the subject matter of the DOCUMENT;
 - 15 9. The reason why YOU cannot produce the DOCUMENT.
- 16 G. YOU are under a continuing duty to amend YOUR written responses to the REQUESTS
17 and to produce additional DOCUMENTS if the written responses or document production
18 is incomplete or incorrect in ANY material respect, and if the additional or corrective
19 information has not otherwise been made known to the COMMITTEE.
- 20 H. YOU are required to produce the full and complete originals (in native format, if
21 electronic), or copies if the originals are unavailable, of EACH DOCUMENT responsive to
22 the REQUESTS along with ALL non-identical copies and drafts in their entirety. A copy
23 may be produced in lieu of originals if the entirety (front and back where appropriate) of the
24 DOCUMENT is reproduced and YOU state by declaration under penalty of perjury that the
25 copy provided is a true, correct, complete, and accurate duplication of the original.
- 26 I. Produced DOCUMENTS must include ALL exhibits, attachments, and ANY other
27 DOCUMENTS otherwise appended to another DOCUMENT.
- 28 J. For ELECTRONICALLY STORED INFORMATION (“ESI”):

1. Produce DOCUMENTS in accordance with the instructions at <https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data>
2. Produce ESI in its native format.
3. Maintain family integrity.
4. Perform custodian-level de-duplication.
5. Produce a DAT load file with the following metadata fields: Beginning Production Number, Ending Production Number, Beginning Attachment Number, End Attachment Number, Family ID, Page Count, Custodian, Original Location Path, Email Folder Path, Document Type, Doc Author, Doc Last Author, Comments, Categories, Revisions, File Name, File Size, MD5 Hash, Date Last Modified, Time Last Modified, Date Created, Time Created, Date Last Accessed, Time Last Accessed, Date Sent, Time Sent, Date Received, Time Received, To, From, CC, BCC, Email Subject, Path to Native, Path to Full Text, Original Time Zone.
6. Process ESI in Pacific Time Zone and provide a metadata field indicating original time zone.

K. If YOU withhold or redact a portion of ANY DOCUMENT under a claim of privilege or other protection, then the DOCUMENT must be identified on a privilege log, which shall be produced contemporaneously with the non-privileged DOCUMENTS responsive to this REQUEST, and which privilege log shall state the following information:

[remainder of page left intentionally blank]

1. The date of the DOCUMENT;
2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
4. The name, address, telephone number and work title of EACH recipient of the DOCUMENT;
5. The number of pages in the DOCUMENT;
6. The document control number, if ANY;
7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has/have possession, custody, or control of the DOCUMENT;
8. A general description of the subject matter of the DOCUMENT or the portion redacted without disclosing the asserted privileged or protected COMMUNICATION;
9. The specific privilege(s) or protection(s) that YOU contend applies.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All COMMUNICATIONS between YOU and STACY MATTSON.

REQUEST FOR PRODUCTION NO. 2:

All DOCUMENTS CONCERNING ANY BMO account held in the name of STACY MATTSON (whether in her name only or her name along with other PERSONS), including, but not limited to, (a) monthly statements; (b) copies of cancelled checks; (c) wire transfer confirmations; and (d) debit and credit advices.

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EXHIBIT 2
Declaration of Gillian N. Brown, Esq.

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

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gbrown@pszjlaw.com

*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

In re
KS MATTSON PARTNERS, LP,²
Debtor.

**DECLARATION OF GILLIAN N.
BROWN IN SUPPORT OF THE
SECOND *EX PARTE* APPLICATION OF
THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR
ENTRY OF AN ORDER PURSUANT TO
BANKRUPTCY RULE 2004
AUTHORIZING ORAL EXAMINATION
OF AND PRODUCTION OF
DOCUMENTS BY BMO BANK, N.A.**

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned 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 address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

² The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210. Solana Beach, CA 92075.

1 I, Gillian N. Brown, declare under penalty of perjury as follows:

2 1. I am of counsel at the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZJ”),
3 counsel to the Official Committee of Unsecured Creditors (“Committee”) in the above-captioned
4 case. My office address and phone number at PSZJ are 10100 Santa Monica Boulevard, 13th Floor;
5 Los Angeles, California 90067; 310-277-6910. I am a member in good standing of the bars of
6 California, the District of Columbia, and New York. I am on inactive status with the Bar of Texas.
7 I am admitted to practice before this Court.

8 2. I submit this Declaration in support of the *SECOND EX PARTE APPLICATION*
9 *OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER*
10 *PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND*
11 *PRODUCTION OF DOCUMENTS BY BMO BANK, N.A.* (the “Application”) to which this
12 Declaration is appended. I have personal knowledge of the facts set forth in this Declaration unless
13 otherwise stated.

14 3. The Committee is informed that Stacy Mattson is the wife of Kenneth Mattson. Mr.
15 Mattson is one of Debtor LFM’s founders and former principal. Ms. Mattson herself was a 49%
16 owner in Debtor KSMP. Mr. Mattson appears to have used LeFever Mattson to facilitate a years-
17 long campaign of self-serving transactions, many of which were not recorded in the books and
18 records of the LFM Debtors or any of their associated LPs or LLCs (collectively, the “Self-
19 Serving Transactions”).³ The Committee’s professionals have been conducting an investigation
20 (the “Committee Investigation”) into the Self-Serving Transactions, and other potential claims and
21 causes of action that may be asserted against non-Debtors.

22 4. The Committee is informed that Ms. Mattson holds or held at least one account in
23 her name at BMO.

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27 _____
28 ³ See Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions [Docket No. 5] (the
“First-Day Decl.”), ¶ 27.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct to the best of my knowledge and belief.

3 Executed on December 11, 2025 at Ventura, California.

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By: /s/ Gillian N. Brown
Gillian N. Brown

EXHIBIT 3
Proposed Form of Order Granting *Ex Parte* Application

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

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*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

In re
KS MATTSON PARTNERS, LP,²
Debtor.

**ORDER GRANTING THE SECOND *EX
PARTE* APPLICATION OF THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ENTRY
OF AN ORDER PURSUANT TO
BANKRUPTCY RULE 2004
AUTHORIZING ORAL EXAMINATION
OF AND PRODUCTION OF
DOCUMENTS BY BMO BANK, N.A.**

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned 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 address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

² The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210. Solana Beach, CA 92075.

1 Upon consideration of the *SECOND EX PARTE APPLICATION OF THE OFFICIAL*
2 *COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO*
3 *BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND PRODUCTION*
4 *OF DOCUMENTS BY BMO BANK, N.A.* (the “Application”) [Doc. No.], the record in this
5 case, and for good and sufficient cause appearing,

6 IT IS HEREBY ORDERED AS FOLLOWS:

- 7 1. The Application is GRANTED.
- 8 2. The Official Committee of Unsecured Creditors is authorized to issue a subpoena
9 directed to BMO Bank, N.A. (“BMO”) requiring BMO to (a) complete its production, by **January**
10 **7, 2026**, of documents responsive to the Requests for Production (the “Requests”) set forth
11 substantially in the form attached as **Exhibit 1** to the Application; and (b) provide oral testimony on
12 a mutually agreed date no later than **January 30, 2026** (unless the Committee and BMO agree to
13 extend that date) relating to (i) BMO’s search for and possession, custody, or control of documents
14 responsive to the Requests; and (ii) the subject matter of the Requests.

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

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

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

In re
KS MATTSON PARTNERS, LP,²
Debtor.

CERTIFICATE OF SERVICE

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned 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 address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

² The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210. Solana Beach, CA 92075.

1 STATE OF CALIFORNIA)
2 CITY OF LOS ANGELES)

3 I, Maria R. Viramontes, am employed in the city and county of Los Angeles, State of
4 California. I am over the age of 18 and not a party to the within action; my business address is
5 10100 Santa Monica Blvd., Suite 1300, Los Angeles, California 90067.

6 On December 12, 2025, I caused to be served the **SECOND EX PARTE APPLICATION OF**
7 **THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN**
8 **ORDER PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING ORAL**
9 **EXAMINATION OF AND PRODUCTION OF DOCUMENTS BY BMO BANK, N.A.;**
10 **DECLARATION OF GILLIAN N. BROWN, ESQ.** in the manner stated below:

11 <input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On December 12, 2025, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below. See Attached.
12 <input checked="" type="checkbox"/>	BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. subpoena.processing@bmo.com and mancy.pendergrass@bmo.com

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18 I declare under penalty of perjury, under the laws of the State of California and the United
19 States of America that the foregoing is true and correct.

20 Executed on December 12, 2025, at Los Angeles, California.

21 /s/ Maria R. Viramontes

22 Maria R. Viramontes
23
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TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)

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