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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re:

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

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**NOTICE OF AUCTION OF SUBJECT
 PROPERTY 951-1047 ALAMO DRIVE,
 VACAVILLE, CA 95687**

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 9562. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/IM>

The Auction will be held by videoconference via Zoom.

Participating parties will be provided the Zoom instructions prior to the Auction.

Time: December 19, 2025, at 1:00 PM Pacific Time

PLEASE TAKE NOTICE OF THE FOLLOWING:

On August 6, 2024, Windscape Apartments, LLC filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the “Bankruptcy Court”).

On September 12, 2024, LeFever Mattson, a California corporation (“LeFever Mattson”), and 57 affiliated entities (the “September 12 Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

On October 2, 2024, Pinewood Condominiums, LP and Ponderosa Pines, LP, both affiliates of LeFever Mattson, filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “October 2 Debtors,” and collectively with Windscape Apartments, LLC and the September 12 Debtors, the “Debtors”²).

On November 22, 2024, KSMP became subject to an involuntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2024, the Court entered the *Stipulated Order for Relief in an Involuntary Case* [KSMP Dkt. No. 131]. The bankruptcy cases of the Debtors and KSMP are being jointly administered for procedural purposes only (the “Chapter 11 Cases”).

On November 19, 2025, the Debtors filed the *Notice of Sale of Subject Property Located at 951-1047 Alamo Drive, Vacaville, CA 95687* [Dkt. No. 2875] (the “Sale Notice”)³ and the *Declaration of Dustin A. Frazier in Support of Adequate Assurance of Future Performance by FMC Golden Hills LLC with Respect to the Assumption and Assignment of Executory Leases and/or Unexpired Contracts in Connection with the Sale of 951-1047 Alamo Drive, Vacaville, CA 95687* [Dkt. No. 2876] pursuant to the *Order Establishing Omnibus Procedures for Real Property Sales* (the “Sale Procedures Order”) [Dkt. No. 971] entered on March 5, 2025.

Pursuant to the Sale Notice, qualified overbids were allowed prior to the Objection Deadline according to the overbid and auction procedures (the “Auction Procedures”) attached to the Sale Notice as Exhibit 2.

The Debtors have received one or more Qualified Bids for the Subject Property. Accordingly, the Debtors will conduct an Auction for the Subject Property, beginning on **December 19, 2025, at 1:00 p.m. (Prevailing Pacific Time)**, to be held by videoconference.

² Unless otherwise indicated, “Debtors” as used herein excludes KSMP.

³ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Sale Notice.

1 The Auction shall be recorded on video and may be cancelled or adjourned by the Debtors,
2 in consultation with the Committee.

3 The Debtors, the Committee, the Proposed Buyer, and the Qualified Bidders, and each of
4 their respective advisors, shall be permitted to attend the Auction at the time and place as indicated
above.

5 Only the Proposed Buyer and the Qualified Bidders (jointly, the "Bidders") will be entitled
6 to make any Subsequent Bids at the Auction.

7 No later than **December 17, 2025, at 1:00 p.m. (Prevailing Pacific Time)**, each Bidder
8 must inform the Debtors whether it intends to participate in the Auction; provided that in the event
9 a Bidder elects not to participate in the Auction, such Bidder's Qualified Bid shall nevertheless
10 remain fully enforceable against such Bidder for the Bid Lifetime. No later than December 18,
11 2025, the Debtors will provide to all Bidders who timely informed the Debtors that they intend to
participate in the Auction a copy of the Qualified Bid that the Debtors believe, in their reasonable
business judgment, in consultation the Committee and their respective advisors, is the highest or
otherwise best offer (the "Starting Bid"). The starting and subsequent minimum bid increments
shall be **\$174,000**.

12 All Bidders must have at least one individual representative with authority to bind such
13 Bidder attending the Auction in person.

14 This notice is subject to the fuller terms and conditions of the Sale Procedures Order, the
15 Sale Notice, and the Auction Procedures. In the event of any conflict, the Sale Procedures Order
16 shall control, and the Debtors encourage parties in interest to review such documents in their
17 entirety. Copies of the Sale Procedures Order, the Sale Notice, the Auction Procedures, and any
related documents can be viewed and/or obtained by: (i) accessing the Bankruptcy Court's website
at <http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' claims and noticing agent, KCC
dba Verita Global, at the following web address: <https://www.veritaglobal.net/LM>, or by calling
(877) 709-4751 (toll free) for U.S. and Canada-based parties; or (424) 236-7231 for International
parties or by e-mail at: www.veritaglobal.net/lm/inquiry. Note that a PACER password is needed
to access documents on the Bankruptcy Court's website.

21 Dated: December 12, 2025

KELLER BENVENUTTI KIM LLP

22 By: /s/ Gabrielle L. Albert

Gabrielle L. Albert

*Attorneys for the Debtors and Debtors in
Possession*