1 KELLER BENVENUTTI KIM LLP TOBIAS S. KELLER (Cal. Bar No. 151445) 2 (tkeller@kbkllp.com) DAVID A. TAYLOR (Cal. Bar No. 247433) 3 (dtaylor@kbkllp.com) THOMAS B. RUPP (Cal. Bar No. 278041) 4 (trupp@kbkllp.com) 425 Market Street, 26th Floor 5 San Francisco, California 94105 Telephone: (415) 496-6723 6 Facsimile: (650) 636-9251 7 Attorneys for the Debtors and Debtors in Possession 8 UNITED STATES BANKRUPTCY COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SANTA ROSA DIVISION 11 12 Lead Case No. 24-10545 (CN) In re: 13 (Jointly Administered) LEFEVER MATTSON, a California 14 Chapter 11 corporation, et al., 1 NOTICE OF HEARING ON MOTION OF 15 Debtors. **DEBTORS TO ESTABLISH PROCEDURES** FOR REAL PROPERTY SALES (SOCOTRA 16 **COLLATERAL**) 17 Date: April 16, 2025 18 Time: 11:00 a.m. (Pacific Time) (In Person or Via Zoom) Place: 19 United States Bankruptcy Court 1300 Clay Street, Courtroom 215 20 Oakland, CA 94612 21 Objection Deadline: April 9, 2025 22 23 24 25 26

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The last four digits of LeFever Mattson's tax identification number are 7537. 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 address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

TO: THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, ALL CREDITORS AND OTHER PARTIES IN INTEREST:

**PLEASE TAKE NOTICE** that 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 "<u>Bankruptcy Code</u>") with the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the "<u>Bankruptcy Court</u>").

**PLEASE TAKE FURTHER NOTICE** that on September 12, 2024, LeFever Mattson, a California corporation ("<u>LeFever Mattson</u>"), and 57 affiliated entities (the "<u>September 12 Debtors</u>") filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that 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"). The bankruptcy cases of the Debtors are being jointly administered for procedural purposes only (the "Chapter 11 Cases").

**PLEASE TAKE FURTHER NOTICE** that on March 26, 2025, the Debtors filed the *Motion of Debtors to Establish Procedures for Real Property Sales (Socotra Collateral)* (the "Motion").<sup>2</sup> By this Motion, the Debtors seek approval and implementation of procedures (the "Socotra Sale Procedures")<sup>3</sup> related to the sale of their real property secured by Socotra Capital, Inc. (the "Socotra Properties"). The relief requested in the Motion seeks entry of an order similar to that granted in the *Order Establishing Omnibus Procedures for Real Property Sales* [Dkt. No. 971] entered on March 5, 2025, approving procedures for the sale of certain of the Debtors' real property (the "Original Sale Procedures"). The Socotra Sale Procedures are identical to the Original Sale Procedures except in one respect: the Debtors will retain a portion of the proceeds sufficient to adequately protect Socotra from the sale of Socotra Properties; those funds will remain in a segregated account until the investigation has concluded.

**PLEASE TAKE FURTHER NOTICE** that the hearing on the Motion has been set for **April 16, 2025, at 11:00 a.m. (Pacific Time)**, before the Honorable Charles Novack, United States Bankruptcy Judge.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Bankruptcy Rule 9014-1(c)(2), any objections to granting the Motion must be filed with the Bankruptcy Court and served on counsel to the Debtors no later than **April 9, 2025**.

PLEASE TAKE FURTHER NOTICE that counsel, parties, and other interested parties may attend in person in Courtroom 215 in Oakland, by Zoom video, or by Zoom telephone. Additional information is available on Judge Novack's Procedures page on the Bankruptcy Court's website, and information on how to attend the hearing by Zoom will be included with each calendar posted under Judge Novack's Calendar on the Bankruptcy Court's website. If you have questions about how to participate in a video or telephonic hearing, you may contact the court by calling

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<sup>&</sup>lt;sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

These procedures are available for the Debtors to use if they elect to do so. The Debtors retain the option to file a separate motion to sell a property pursuant to 11 U.S.C. § 363 in their sole discretion.

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888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website at www.canb.uscourts.gov.

**PLEASE TAKE FURTHER NOTICE** that a copy of the Motion and its supporting 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.

Dated: March 26, 2025 KELLER BENVENUTTI KIM LLP

By: <u>/s/ Gabirelle L. Albert</u>
Gabrielle L. Albert

Attorneys for the Debtors and Debtors in Possession

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