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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) (Jointly Administered) Chapter 11 **PLAN PROPONENTS' NOTICE OF EXPERT TOPICS IN CONNECTION WITH PLAN CONFIRMATION**
In re: KS MATTSON PARTNERS, LP, Debtor.	

[1] 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.

PLEASE TAKE NOTICE THAT, pursuant to the Court's *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. 3105] (the "Scheduling Order"), 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") hereby identify the following topics on which the Plan Proponents intend to submit expert reports (the "Expert Topics") in connection with confirmation of 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"):

Topic No. 1:

Substantive Consolidation

Topic No. 2:

Ponzi Finding

Topic No. 3:

Liquidation Analysis

The Plan Proponents reserve the right to amend or supplement the Expert Topics.

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Dated: December 31, 2025

KELLER BENVENUTTI KIM LLP

By: */s/ David A. Taylor*
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