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Attorneys for the Tillman Opposing Investors[1]

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re: LEFEVER MATTSON, a California corporation, et al.[2] Debtors. /	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11 **NOTICE OF SERVICE OF DISCOVERY AND IDENTIFICATION OF EXPERT REPORT TOPICS**

[1] The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulios; Kay Poulios; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the "Tillman Opposing Investors").

[2] 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.

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591054526010600000000008

In re: KS MATTSON PARTNERS, LP,[3] Debtor. /	Judge: Hon. Charles D. Novack

PLEASE TAKE NOTICE that on December 31, 2025, the Tillman Opposing Investors served the following discovery requests and discovery-related documents on the Debtors and the Committee:

- Request for Inspection and Production of Documents and Tangible Things to Debtors, Set One, attached hereto as Exhibit A;
- Request for Inspection and Production of Documents and Tangible Things to the Committee, Set One, attached hereto as Exhibit B;
- Interrogatories to Debtors, Set One, attached hereto as Exhibit C;
- Interrogatories to the Committee, Set One, attached hereto as Exhibit D; and
- Identification of Expert Report Topics, attached hereto as Exhibit E.

PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ, LLP

DATED: January 6, 2026

By: */s/* Isaac M. Gradman
ISAAC M. GRADMAN
MICHAEL E. TRACHT
ALEXANDER A. WIEGEL

AND

MICHAEL C. FALLON
MICHAEL C. FALLON, JR.

Attorneys for Tillman Opposing Investors

[3] The last four digits of K S Mattson Partners, LP's tax identification number are 5060. K S Mattson Partners, LP's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210. Solana Beach, CA 92075.

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

EXHIBIT A

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Attorneys for the Tillman Opposing Investors[1]

PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re: LEFEVER MATTSON, a California corporation, et al.[2] Debtors. /	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11 **REQUESTS FOR INSPECTION AND PRODUCTION OF DOCUMENTS AND TANGIBLE THINGS TO DEBTORS, SET ONE**

[1] The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulios; Kay Poulios; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the "Tillman Opposing Investors").

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In re: KS MATTSON PARTNERS, LP, Debtor. /	Judge: Hon. Charles D. Novack

Propounding Party: TILLMAN OPPOSING INVESTORS

Responding Party: DEBTORS (as defined below)

Set Number: ONE

TO THE DEBTORS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Bankruptcy Procedure, Rules 7026 and 9014(c), and Federal Rules of Civil Procedure, Rules 26 and 34, the TILLMAN OPPOSING INVESTORS request that the DEBTORS produce the following described items for inspection and copying at the law offices of Perry, Johnson, Anderson, Miller & Moskowitz, LLP, 438 First Street, 4th Floor, Santa Rosa, California 95401. The items may be produced on or before January 30, 2026, by providing electronic copies to counsel for the undersigned, or through other means by mutual agreement. *See 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* (Doc. No. 3113) ¶ 8. The DEBTORS are requested to serve written responses by the same date. *See id*. The written responses shall identify the DOCUMENTS to be produced and/or any objections.

INSTRUCTIONS

1. DOCUMENTS responsive to these requests are to be produced in an organized and searchable manner and in a .PDF format, unless formatting makes such impractical or impossible, in which case such DOCUMENT shall be produced in its original format and manner as such was kept in the usual course of business. DOCUMENTS are to be organized and labeled in such a way as to correspond them to the individual requests below, and are to be produced without masking, redacting, obliteration, or alteration, of any sort.

2. YOU are required to produce not only those DOCUMENTS in YOUR own

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possession, custody, and control, but also those reasonably available to YOU, including those within the possession, custody, or control, of attorneys, investigators, accountants, employees, agents, and any other representatives acting on your behalf or retained by YOU.

3. A representation of YOUR inability to comply with any particular request for production shall affirm that a diligent search and reasonable inquiry has been made in an effort to comply with the request. This representation shall also specify whether the inability to comply is because the particular item or category has never existed, has been destroyed, has been lost, misplaced, or stolen, or has never been, or no longer is, in YOUR possession, custody, or control. This statement shall set forth the name and address of any natural PERSON or organization known or believed to have possession, custody, or control of the item or category of items.

4. If YOU object to the request for production of an item or category of items, the response shall (a) identify with particularity any DOCUMENT that an objection is being made to, and (b) set forth the extent of and the specific ground for the objection. If YOU properly object to the production of any DOCUMENT (or portions of a DOCUMENT), please produce all remaining DOCUMENTS (or portions of them) called for by the request for production to which YOU do not object.

5. If an objection is based on a claim of privilege, or that the information sought is protected by the work product doctrine, the particular privilege or doctrine invoked shall be stated, and a privilege log shall be provided. The privilege log shall contain the following information:

(a) The type or general description of the DOCUMENT or thing;

(b) The general subject matter of the DOCUMENT or thing;

(c) The title of the DOCUMENT or thing;

(d) The date on which the DOCUMENT or thing was created;

(e) The name, address, phone number, and present employment position of each of the DOCUMENT or thing's originators or authors;

(f) The position of its originator or author at the time the DOCUMENT or

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thing was prepared;

(g) The names, addresses, phone numbers, and present employment position of each recipient of the DOCUMENT or thing;

(h) The employment position of each recipient of the DOCUMENT or thing at the time the DOCUMENT or thing was prepared and the time it was received;

(i) The privilege claimed and the basis for the same and/or, if the work product doctrine is asserted, the proceeding for which the DOCUMENT or thing was prepared; and

(j) Such other information sufficient to identify the DOCUMENT or thing for purposes of a subpoena deuces tecum, including but not limited to, its author, addressee, recipients, and all other persons and their employers at the time of preparation who wrote, signed, initialed, dictated or otherwise participated in the creation of the DOCUMENT or thing, and, where not apparent from the identification alone, the relationship of such persons to each other.

6. If any portion of any DOCUMENT is responsive to any of these demands, the entire DOCUMENT shall be produced.

7. Each DOCUMENT called for herein of which YOU have knowledge or information, but which is not in YOUR possession, custody or control, or reasonably available to YOU, shall be identified as follows:

(a) Identify the DOCUMENT;

(b) Identify the name, address, and phone number of the person who currently has possession, custody, or control of the DOCUMENT; and

(c) Identify the name, address, and phone number of each person who previously had possession, custody, or control of the DOCUMENT.

8. Whenever a singular form of a word is used, it should be construed to include the plural, and vice versa. Likewise, if the masculine gender of a word is used, it should be

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construed to include the neuter and feminine.

9. Each request for production should be construed independently and not by reference to any other request for the purpose of limiting that request, except that identical DOCUMENTS need not be produced in response to more than one request.

10. Each request for production is deemed continuing until the date of trial or final hearing hereof to produce the DOCUMENTS requested herein. YOU are required to produce further DOCUMENTS requested herein if and when they are obtained after the date DOCUMENTS are initially produced, at a place and time to be agreed upon between counsel.

DEFINITIONS

1. As used herein, the term "ACTION" refers to the legal action captioned *In re LeFever Mattson, et al.*, initiated on or about September 12, 2024, and currently pending in the United States Bankruptcy Court, Northern District of California, Case No. 24-BK-10545, together with all legal actions administratively consolidated therewith.

2. As used herein, the term "TILLMAN OPPOSING INVESTORS" has the meaning given to it on page 1, footnote 1, *supra*.

3. As used herein, the term "COMMITTTEE" refers to the Official Committee of Unsecured Creditors as appointed in the ACTION pursuant to the *Amended Appointment of Official Committee of Unsecured Creditors* (Doc. No. 368).

4. As used herein, the terms "COMMUNICATION" and/or "COMMUNICATIONS" refer to any recordation, exchange, transfer, or transmittal of information, whether in writing, oral, or other form, including, but not limited to, in-person and telephone conversations, voice mail messages, text messages, letters, notes, electronically generated communications (e.g., e-mail, texts, IM social media messages) and includes all DOCUMENTS (as defined herein) relating to such COMMUNICATIONS, regardless of whether any such DOCUMENT, or the information contained therein, was transmitted by its author to any other PERSON.

5. As used herein, the terms "CONCERN" and/or "CONCERNING" means anything that, in whole or in part, constitutes, comprises, contains, describes, evidences,

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embodies, reflects, refers to, relates to, identifies, states, pertains directly or indirectly to, discusses, alludes to, responds to, rebuts, mentions, comments upon, analyzes, explains, supports, summarizes, is logically or factually connected with, substantiates or is in any other way relevant to the given subject matter.

6. As used herein, the terms "DEBTORS" and/or "YOU" refer to Debtor LeFever Mattson ("LFM"), Debtor KS Mattson Partner, LP ("KSMP"), all other entities whose chapter 11 bankruptcy actions have been administratively consolidated under the Action, and any affiliates and subsidiaries of KSMP, or entities under the control of KSMP, who may have yet to file for bankruptcy, INCLUDING, but not limited to, Specialty Properties Partners, LP; Treehouse Investments, LP; and Perris Freeway Plaza, LP. The term "DEBTORS" includes directors, officers, members, partners, employees, and agents of the DEBTORS and any PERSON or entity acting on DEBTORS' behalf, INCLUDING agents, assigns, heirs, successors, trustees, employees, firms, partners, joint-venturers, limited liability companies, partnerships, corporations, associations, or other business enterprises, or any combination of the foregoing, to the extent such PERSONS or entities are acting in their official capacity as representatives of the DEBTORS.

7. As used herein, the terms "DOCUMENT" and/or "DOCUMENTS" are intended to have the broadest possible meaning and includes, but is not limited to, the original or copy, and both sides thereof, of written, recorded, or graphic material, however produced or reproduced, of any kind in your possession, custody, or control, or in the possession, custody, or control of any officers, members, partners, employees, servants, or your agents or representatives, including, without limitation, letters, correspondence, telegrams, memoranda, records, minutes, ESI, contracts, agreements, memoranda, or records of telephone or personal conversations or conferences, interoffice COMMUNICATIONS, emails, sound recordings, handwritings, electronic data processing inputs, and memories of all kinds, including hard drives, CD ROM data, tapes and discs, computer reports and printouts, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, teletype messages, bills of lading, invoices, work sheets, and index cards, or copies of such documents where originals

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are not available. The term "DOCUMENT" or "DOCUMENTS" includes any and all matter that CONCERNS in whole or in part the subject referred to in a demand to produce. Where a DOCUMENT has been prepared in several copies that are not identical (or which by reason of subsequent modification, addition, or notation are no longer identical), each nonidentical copy is a separate DOCUMENT.

8. As used herein, the terms "ELECTRONICALLY STORED INFORMATION" or "ESI" refer to information that is stored in any electronic medium, including but not limited to data on a computer's hard drive, peripheral storage devices, thumb drives, laptop computers, cell phones, tablets, cloud storage, USB drives, digital and video recordings, voice mails, digital photographs, internet search histories, social media, and deleted data files if recoverable.

9. As used herein, the term "ENTITY" means "entity," as defined in section 101(15) of the Bankruptcy Code.

10. As used herein, the terms "INCLUDE," "INCLUDES," and/or "INCLUDING" shall be used in the broadest possible sense and are not meant to be limiting. Any list following these terms contains illustrative examples of the types of items or information responsive to the request, but the list is without limitation and does not constitute an exclusive, all encompassing, or exhaustive listing of every type of item or piece of information responsive to the request.

11. As used herein, the term "INVESTIGATION REPORT" refers to Exhibit 1 to the *Notice of Filing Joint Investigation Report and Summary of Global Settlement* (Doc. No. 2568), filed in the ACTION on October 15, 2025.

12. As used herein, the term "INVESTOR" refers to any PERSON or ENTITY that invested in or with DEBTORS, whether such investment is recognized within DEBTORS' books and records or not, INCLUDING, but not limited to, any PERSON or ENTITY that filed a proof of claim or proof of interest in the ACTION against the DEBTORS alleging to have invested in or with DEBTORS.

13. As used herein, the terms "PERSON" and "INDIVIDUAL" are interchangeable

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and shall mean any natural person, including, without limitation, an entity's directors, officers, members, partners, employees, and agents, as well as any association, joint venture, corporation, partnership, firm, organization, trust, corporation, or any other kind of business or legal entity or governmental body, unless the context indicates otherwise.

14. As used herein, the term "PLAN" refers to the *Third Amended Joint Chapter 11 Plan of Liquidation* (Doc. No. 3108), as filed in the Action on December 11, 2025, INCLUDING any supplements or amendments thereto.

15. As used herein, the term "PLAN PROPONENTS" refers to the DEBTORS and the COMMITTEE, collectively.

16. The terms "and," "or," and "and/or" shall mean and/or shall be construed both conjunctively and disjunctively so as to bring within the scope of any request for production herein all documents and things that might otherwise be construed to be outside of such scope.

17. The terms "any" and "each" as used herein shall also include "every" and "all," and vice versa.

18. The use of a singular noun shall be construed to include the plural noun, and the use of a plural noun shall be construed to include the singular noun.

19. The use of a verb in any tense shall be construed as the use of that verb in all other tenses whenever necessary to bring within the scope of a discovery request documents or information that might otherwise be construed to be outside its scope.

TIME PERIOD COVERED

Unless otherwise noted by a particular request, the relevant time period for each of the below requests is from the initial date of incorporation of each of the DEBTORS, to the present.

NON-PRODUCTION

If any DOCUMENT falling within the TILLMAN OPPOSING INVESTORS' requests for inspection and production is excluded from YOUR production in response to these requests on the grounds of an objection or privilege, YOU shall include in YOUR written response to such request a list of the documents so withheld from production, identifying each document

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in accordance with Instructions paragraph 5, supra. If the DEBTORS have at any time relinquished possession, custody, or control of or destroyed any DOCUMENT falling within the TILLMAN OPPOSING INVESTORS' request, YOU shall identify each DOCUMENT in accordance with Instructions paragraph 7, supra, and identify the reason and time that DEBTORS relinquished possession, custody, or control of or destroyed the DOCUMENT in question.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1

All federal, state, and local tax returns filed by, or on behalf of, the DEBTORS, INCLUDING any DOCUMENTS or schedules submitted by, or on behalf of the DEBTORS, therewith, INCLUDING, but not limited to, K-1s, Schedule Es, and Schedule Ds.

REQUEST FOR PRODUCTION NO. 2

All COMMUNICATIONS between the DEBTORS and any other PERSON, INCLUDING COMMUNICATIONS between, among, and within DEBTORS, CONCERNING federal, state, and local tax returns filed by, or on behalf of, or prepared by, or on behalf of, the DEBTORS, INCLUDING, but not limited to, COMMUNICATIONS CONCERNING DOCUMENTS or schedules prepared for or submitted with any federal, state, and local tax returns filed by, or on behalf of, the DEBTORS.

REQUEST FOR PRODUCTION NO. 3

All articles of incorporation, certificates of incorporation, partnership agreements, shareholder agreements, operating agreements, bylaws, and any other organizational documents prepared or filed by, or on behalf of, the DEBTORS, INCLUDING, but not limited to, any amendments thereto.

REQUEST FOR PRODUCTION NO. 4

All DOCUMENTS CONCERNING formal meetings of DEBTORS' board of directors, board committees, or shareholders, INCLUDING, but not limited to, all minutes, exhibits, agendas, resolutions, and any other materials prepared for, or arising out of, such meetings.

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REQUEST FOR PRODUCTION NO. 5

All DOCUMENTS evidencing the ownership of the DEBTORS, INCLUDING, but not limited to, shareholder ledgers, stock ledgers, shareholder agreements, purchase agreements, operating agreements, transfer agreements, and ownership certifications.

REQUEST FOR PRODUCTION NO. 6

All DOCUMENTS reflecting the internal policies and procedures of the DEBTORS, INCLUDING, but not limited to, ethics policies, compliance manuals, insider trading policies, and employment training manuals.

REQUEST FOR PRODUCTION NO. 7

All DOCUMENTS comprising the DEBTORS' formal financial records, INCLUDING, but not limited to, general ledgers, balance sheets, income statements, cash flow statements, and Quickbooks files or other financial data files.

REQUEST FOR PRODUCTION NO. 8

All DOCUMENTS CONCERNING any filings or reports submitted with respect to the DEBTORS to any organizations with supervisory authority over DEBTORS, INCLUDING, but not limited to, local, state, or federal government or regulatory organizations, such as the Securities and Exchange Commission or the California Department of Financial Protection and Innovation, or non-governmental organizations, such as the Financial Industry Regulatory Authority.

REQUEST FOR PRODUCTION NO. 9

All DOCUMENTS CONCERNING whether DEBTORS were operated as a Ponzi scheme.

REQUEST FOR PRODUCTION NO. 10

All DOCUMENTS CONCERNING the finding sought by PLAN PROPONENTS in Section 9.1(c) of the PLAN that DEBTORS "were operated as a Ponzi scheme."

REQUEST FOR PRODUCTION NO. 11

All COMMUNICATIONS between DEBTORS and any other PERSON, INCLUDING COMMUNICATIONS between, among, and within DEBTORS, CONCERNING actual or

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

potential fraud, misrepresentations, or other unlawful or irregular practices CONCERNING the business operations of DEBTORS or the investments offered by DEBTORS.

REQUEST FOR PRODUCTION NO. 12

All DOCUMENTS CONCERNING whether DEBTORS offered INVESTORS a legitimate profit-making opportunity.

REQUEST FOR PRODUCTION NO. 13

All DOCUMENTS CONCERNING the INVESTIGATION REPORT.

REQUEST FOR PRODUCTION NO. 14

All DOCUMENTS CONCERNING the DEBTORS' conveyance, grant, or transfer of direct ownership interests in real property to INVESTORS, INCLUDING, but not limited to, the conveyance, grant, or transfer to INVESTORS of tenant-in-common ownership interests in real property.

REQUEST FOR PRODUCTION NO. 15

All DOCUMENTS CONCERNING the conveyance, grant, or transfer by INVESTORS in the DEBTORS of direct ownership interests in real property to the DEBTORS, INCLUDING, but not limited to, the conveyance, grant, or transfer to DEBTORS of grant deeds or other direct ownership interests in real property.

REQUEST FOR PRODUCTION NO. 16

All reports, analyses, exhibits, attachments or summaries prepared by PwC US Business Advisory LLP CONCERNING the INVESTIGATION REPORT.

REQUEST FOR PRODUCTION NO. 17

All DOCUMENTS CONCERNING the information contained in Section II.B. (Summary of Evidence of Ponzi Scheme) of the INVESTIGATION REPORT.

REQUEST FOR PRODUCTION NO. 18

All DOCUMENTS identified in DEBTORS' responses to the TILLMAN OPPOSING INVESTORS' Interrogatories to DEBTORS, Set One, served concurrently herewith.

/ / /

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ, LLP

DATED: December 31, 2025

By: */s/* Isaac Gradman
ISAAC M. GRADMAN
MICHAEL E. TRACHT
ALEXANDER A. WIEGEL

AND

MICHAEL C. FALLON
MICHAEL C. FALLON, JR.

Attorneys for Tillman Opposing Investors

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EXHIBIT B

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Attorneys for the Tillman Opposing Investors[1]

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re: LEFEVER MATTSON, a California corporation, et al.[2] Debtors. /	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11 **REQUESTS FOR INSPECTION AND PRODUCTION OF DOCUMENTS AND TANGIBLE THINGS TO THE COMMITTEE, SET ONE**

[1] The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulios; Kay Poulios; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the "Tillman Opposing Investors").

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In re: KS MATTSON PARTNERS, LP, Debtor. /	Judge: Hon. Charles D. Novack

Propounding Party: TILLMAN OPPOSING INVESTORS

Responding Party: The COMMITTEE (as defined below)

Set Number: ONE

TO THE COMMITTEEE AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Bankruptcy Procedure, Rules 7026 and 9014(c), and Federal Rules of Civil Procedure, Rules 26 and 34, the TILLMAN OPPOSING INVESTORS request that the COMMITTEE produces the following described items for inspection and copying at the law offices of Perry, Johnson, Anderson, Miller & Moskowitz, LLP, 438 First Street, 4th Floor, Santa Rosa, California 95401. The items may be produced on or before January 30, 2026, by providing electronic copies to counsel for the undersigned, or through other means by mutual agreement. *See 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* (Doc. No. 3113) ¶ 8. The COMMITTEE is requested to serve written responses by the same date. *See id*. The written responses shall identify the DOCUMENTS to be produced and/or any objections.

INSTRUCTIONS

1. DOCUMENTS responsive to these requests are to be produced in an organized and searchable manner and in a .PDF format, unless formatting makes such impractical or impossible, in which case such DOCUMENT shall be produced in its original format and manner as such was kept in the usual course of business. DOCUMENTS are to be organized and labeled in such a way as to correspond them to the individual requests below, and are to be produced without masking, redacting, obliteration, or alteration, of any sort.

2. YOU are required to produce not only those DOCUMENTS in YOUR own

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possession, custody, and control, but also those reasonably available to YOU, including those within the possession, custody, or control, of attorneys, investigators, accountants, employees, agents, and any other representatives acting on your behalf or retained by YOU.

3. A representation of YOUR inability to comply with any particular request for production shall affirm that a diligent search and reasonable inquiry has been made in an effort to comply with the request. This representation shall also specify whether the inability to comply is because the particular item or category has never existed, has been destroyed, has been lost, misplaced, or stolen, or has never been, or no longer is, in YOUR possession, custody, or control. This statement shall set forth the name and address of any natural PERSON or organization known or believed to have possession, custody, or control of the item or category of items.

4. If YOU object to the request for production of an item or category of items, the response shall (a) identify with particularity any DOCUMENT that an objection is being made to, and (b) set forth the extent of and the specific ground for the objection. If YOU properly object to the production of any DOCUMENT (or portions of a DOCUMENT), please produce all remaining DOCUMENTS (or portions of them) called for by the request for production to which YOU do not object.

5. If an objection is based on a claim of privilege, or that the information sought is protected by the work product doctrine, the particular privilege or doctrine invoked shall be stated, and a privilege log shall be provided. The privilege log shall contain the following information:

(a) The type or general description of the DOCUMENT or thing;

(b) The general subject matter of the DOCUMENT or thing;

(c) The title of the DOCUMENT or thing;

(d) The date on which the DOCUMENT or thing was created;

(e) The name, address, phone number, and present employment position of each of the DOCUMENT or thing's originators or authors;

(f) The position of its originator or author at the time the DOCUMENT or

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thing was prepared;

(g) The names, addresses, phone numbers, and present employment position of each recipient of the DOCUMENT or thing;

(h) The employment position of each recipient of the DOCUMENT or thing at the time the DOCUMENT or thing was prepared and the time it was received;

(i) The privilege claimed and the basis for the same and/or, if the work product doctrine is asserted, the proceeding for which the DOCUMENT or thing was prepared; and

(j) Such other information sufficient to identify the DOCUMENT or thing for purposes of a subpoena deuces tecum, including but not limited to, its author, addressee, recipients, and all other persons and their employers at the time of preparation who wrote, signed, initialed, dictated or otherwise participated in the creation of the DOCUMENT or thing, and, where not apparent from the identification alone, the relationship of such persons to each other.

6. If any portion of any DOCUMENT is responsive to any of these demands, the entire DOCUMENT shall be produced.

7. Each DOCUMENT called for herein of which YOU have knowledge or information, but which is not in YOUR possession, custody or control, or reasonably available to YOU, shall be identified as follows:

(a) Identify the DOCUMENT;

(b) Identify the name, address, and phone number of the person who currently has possession, custody, or control of the DOCUMENT; and

(c) Identify the name, address, and phone number of each person who previously had possession, custody, or control of the DOCUMENT.

8. Whenever a singular form of a word is used, it should be construed to include the plural, and vice versa. Likewise, if the masculine gender of a word is used, it should be

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construed to include the neuter and feminine.

9. Each request for production should be construed independently and not by reference to any other request for the purpose of limiting that request, except that identical DOCUMENTS need not be produced in response to more than one request.

10. Each request for production is deemed continuing until the date of trial or final hearing hereof to produce the DOCUMENTS requested herein. YOU are required to produce further DOCUMENTS requested herein if and when they are obtained after the date DOCUMENTS are initially produced, at a place and time to be agreed upon between counsel.

DEFINITIONS

1. As used herein, the term "ACTION" refers to the legal action captioned *In re LeFever Mattson, et al.*, initiated on or about September 12, 2024, and currently pending in the United States Bankruptcy Court, Northern District of California, Case No. 24-BK-10545, together with all legal actions administratively consolidated therewith.

2. As used herein, the term "TILLMAN OPPOSING INVESTORS" has the meaning given to it on page 1, footnote 1, *supra*.

3. As used herein, the terms "COMMITTTEE," "YOU," and/or "YOUR" refer to the Official Committee of Unsecured Creditors as appointed in the ACTION pursuant to the *Amended Appointment of Official Committee of Unsecured Creditors* (Doc. No. 368).

4. As used herein, the terms "COMMUNICATION" and/or "COMMUNICATIONS" refer to any recordation, exchange, transfer, or transmittal of information, whether in writing, oral, or other form, including, but not limited to, in-person and telephone conversations, voice mail messages, text messages, letters, notes, electronically generated communications (e.g., e-mail, texts, IM social media messages) and includes all DOCUMENTS (as defined herein) relating to such COMMUNICATIONS, regardless of whether any such DOCUMENT, or the information contained therein, was transmitted by its author to any other PERSON.

5. As used herein, the terms "CONCERN" and/or "CONCERNING" means anything that, in whole or in part, constitutes, comprises, contains, describes, evidences,

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embodies, reflects, refers to, relates to, identifies, states, pertains directly or indirectly to, discusses, alludes to, responds to, rebuts, mentions, comments upon, analyzes, explains, supports, summarizes, is logically or factually connected with, substantiates or is in any other way relevant to the given subject matter.

6. As used herein, the terms "DEBTORS" refer to Debtor LeFever Mattson ("LFM"), Debtor KS Mattson Partner, LP ("KSMP"), all other entities whose chapter 11 bankruptcy actions have been administratively consolidated under the Action, and any affiliates and subsidiaries of KSMP, or entities under the control of KSMP, who may have yet to file for bankruptcy, INCLUDING, but not limited to, Specialty Properties Partners, LP; Treehouse Investments, LP; and Perris Freeway Plaza, LP. The term "DEBTORS" includes directors, officers, members, partners, employees, and agents of the DEBTORS and any PERSON or entity acting on DEBTORS' behalf, INCLUDING agents, assigns, heirs, successors, trustees, employees, firms, partners, joint-venturers, limited liability companies, partnerships, corporations, associations, or other business enterprises, or any combination of the foregoing, to the extent such PERSONS or entities are acting in their official capacity as representatives of the DEBTORS.

7. As used herein, the terms "DOCUMENT" and/or "DOCUMENTS" are intended to have the broadest possible meaning and includes, but is not limited to, the original or copy, and both sides thereof, of written, recorded, or graphic material, however produced or reproduced, of any kind in your possession, custody, or control, or in the possession, custody, or control of any officers, members, partners, employees, servants, or your agents or representatives, including, without limitation, letters, correspondence, telegrams, memoranda, records, minutes, ESI, contracts, agreements, memoranda, or records of telephone or personal conversations or conferences, interoffice COMMUNICATIONS, emails, sound recordings, handwritings, electronic data processing inputs, and memories of all kinds, including hard drives, CD ROM data, tapes and discs, computer reports and printouts, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, teletype messages, bills of lading, invoices, work sheets, and index cards, or copies of such documents where originals

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are not available. The term "DOCUMENT" or "DOCUMENTS" includes any and all matter that CONCERNS in whole or in part the subject referred to in a demand to produce. Where a DOCUMENT has been prepared in several copies that are not identical (or which by reason of subsequent modification, addition, or notation are no longer identical), each nonidentical copy is a separate DOCUMENT.

8. As used herein, the terms "ELECTRONICALLY STORED INFORMATION" or "ESI" refer to information that is stored in any electronic medium, including but not limited to data on a computer's hard drive, peripheral storage devices, thumb drives, laptop computers, cell phones, tablets, cloud storage, USB drives, digital and video recordings, voice mails, digital photographs, internet search histories, social media, and deleted data files if recoverable.

9. As used herein, the term "ENTITY" means "entity," as defined in section 101(15) of the Bankruptcy Code.

10. As used herein, the terms "INCLUDE," "INCLUDES," and/or "INCLUDING" shall be used in the broadest possible sense and are not meant to be limiting. Any list following these terms contains illustrative examples of the types of items or information responsive to the request, but the list is without limitation and does not constitute an exclusive, all encompassing, or exhaustive listing of every type of item or piece of information responsive to the request.

11. As used herein, the term "INVESTIGATION REPORT" refers to Exhibit 1 to the *Notice of Filing Joint Investigation Report and Summary of Global Settlement* (Doc. No. 2568), filed in the ACTION on October 15, 2025.

12. As used herein, the term "INVESTOR" refers to any PERSON or ENTITY that invested in or with DEBTORS, whether such investment is recognized within DEBTORS' books and records or not, INCLUDING, but not limited to, any PERSON or ENTITY that filed a proof of claim or proof of interest in the ACTION against the DEBTORS alleging to have invested in or with DEBTORS.

13. As used herein, the terms "PERSON" and "INDIVIDUAL" are interchangeable

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and shall mean any natural person, including, without limitation, an entity's directors, officers, members, partners, employees, and agents, as well as any association, joint venture, corporation, partnership, firm, organization, trust, corporation, or any other kind of business or legal entity or governmental body, unless the context indicates otherwise.

14. As used herein, the term "PLAN" refers to the *Third Amended Joint Chapter 11 Plan of Liquidation* (Doc. No. 3108), as filed in the Action on December 11, 2025, INCLUDING any supplements or amendments thereto.

15. As used herein, the term "PLAN PROPONENTS" refers to the DEBTORS and the COMMITTEE, collectively.

16. The terms "and," "or," and "and/or" shall mean and/or shall be construed both conjunctively and disjunctively so as to bring within the scope of any request for production herein all documents and things that might otherwise be construed to be outside of such scope.

17. The terms "any" and "each" as used herein shall also include "every" and "all," and vice versa.

18. The use of a singular noun shall be construed to include the plural noun, and the use of a plural noun shall be construed to include the singular noun.

19. The use of a verb in any tense shall be construed as the use of that verb in all other tenses whenever necessary to bring within the scope of a discovery request documents or information that might otherwise be construed to be outside its scope.

TIME PERIOD COVERED

Unless otherwise noted by a particular request, the relevant time period for each of the below requests is from the initial date of incorporation of each of the DEBTORS, to the present.

NON-PRODUCTION

If any DOCUMENT falling within the TILLMAN OPPOSING INVESTORS' requests for inspection and production is excluded from YOUR production in response to these requests on the grounds of an objection or privilege, YOU shall include in YOUR written response to such request a list of the documents so withheld from production, identifying each document

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in accordance with Instructions paragraph 5, supra. If the COMMITTEE has at any time relinquished possession, custody, or control of or destroyed any DOCUMENT falling within the TILLMAN OPPOSING INVESTORS' request, YOU shall identify each DOCUMENT in accordance with Instructions paragraph 7, *supra*, and identify the reason and time that COMMITTEE relinquished possession, custody, or control of or destroyed the DOCUMENT in question.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1

All federal, state, and local tax returns filed by, or on behalf of, the DEBTORS, INCLUDING any DOCUMENTS or schedules submitted by, or on behalf of the DEBTORS, therewith, INCLUDING, but not limited to, K-1s, Schedule Es, and Schedule Ds.

REQUEST FOR PRODUCTION NO. 2

All COMMUNICATIONS between the DEBTORS and any other PERSON, INCLUDING COMMUNICATIONS between, among, and within DEBTORS, CONCERNING federal, state, and local tax returns filed by, or on behalf of, or prepared by, or on behalf of, the DEBTORS, INCLUDING, but not limited to, COMMUNICATIONS CONCERNING DOCUMENTS or schedules prepared for or submitted with any federal, state, and local tax returns filed by, or on behalf of, the DEBTORS.

REQUEST FOR PRODUCTION NO. 3

All articles of incorporation, certificates of incorporation, partnership agreements, shareholder agreements, operating agreements, bylaws, and any other organizational documents prepared or filed by, or on behalf of, the DEBTORS, INCLUDING, but not limited to, any amendments thereto.

REQUEST FOR PRODUCTION NO. 4

All DOCUMENTS CONCERNING formal meetings of DEBTORS' board of directors, board committees, or shareholders, INCLUDING, but not limited to, all minutes, exhibits, agendas, resolutions, and any other materials prepared for, or arising out of, such meetings.

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REQUEST FOR PRODUCTION NO. 5

All DOCUMENTS evidencing the ownership of the DEBTORS, INCLUDING, but not limited to, shareholder ledgers, stock ledgers, shareholder agreements, purchase agreements, operating agreements, transfer agreements, and ownership certifications.

REQUEST FOR PRODUCTION NO. 6

All DOCUMENTS reflecting the internal policies and procedures of the DEBTORS, INCLUDING, but not limited to, ethics policies, compliance manuals, insider trading policies, and employment training manuals.

REQUEST FOR PRODUCTION NO. 7

All DOCUMENTS comprising the DEBTORS' formal financial records, INCLUDING, but not limited to, general ledgers, balance sheets, income statements, cash flow statements, and Quickbooks files or other financial data files.

REQUEST FOR PRODUCTION NO. 8

All DOCUMENTS CONCERNING any filings or reports submitted with respect to the DEBTORS to any organizations with supervisory authority over DEBTORS, INCLUDING, but not limited to, local, state, or federal government or regulatory organizations, such as the Securities and Exchange Commission or the California Department of Financial Protection and Innovation, or non-governmental organizations, such as the Financial Industry Regulatory Authority.

REQUEST FOR PRODUCTION NO. 9

All DOCUMENTS CONCERNING whether DEBTORS were operated as a Ponzi scheme.

REQUEST FOR PRODUCTION NO. 10

All DOCUMENTS CONCERNING the finding sought by PLAN PROPONENTS in Section 9.1(c) of the PLAN that DEBTORS "were operated as a Ponzi scheme."

REQUEST FOR PRODUCTION NO. 11

All COMMUNICATIONS between DEBTORS and any other PERSON, INCLUDING COMMUNICATIONS between, among, and within DEBTORS, CONCERNING actual or

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potential fraud, misrepresentations, or other unlawful or irregular practices CONCERNING the business operations of DEBTORS or the investments offered by DEBTORS.

REQUEST FOR PRODUCTION NO. 12

All DOCUMENTS CONCERNING whether DEBTORS offered INVESTORS a legitimate profit-making opportunity.

REQUEST FOR PRODUCTION NO. 13

All DOCUMENTS CONCERNING the INVESTIGATION REPORT.

REQUEST FOR PRODUCTION NO. 14

All DOCUMENTS CONCERNING the DEBTORS' conveyance, grant, or transfer of direct ownership interests in real property to INVESTORS, INCLUDING, but not limited to, the conveyance, grant, or transfer to INVESTORS of tenant-in-common ownership interests in real property.

REQUEST FOR PRODUCTION NO. 15

All DOCUMENTS CONCERNING the conveyance, grant, or transfer by INVESTORS in the DEBTORS of direct ownership interests in real property to the DEBTORS, INCLUDING, but not limited to, the conveyance, grant, or transfer to DEBTORS of grant deeds or other direct ownership interests in real property.

REQUEST FOR PRODUCTION NO. 16

All reports, analyses, exhibits, attachments or summaries prepared by PwC US Business Advisory LLP CONCERNING the INVESTIGATION REPORT.

REQUEST FOR PRODUCTION NO. 17

All DOCUMENTS CONCERNING the information contained in Section II.B. (Summary of Evidence of Ponzi Scheme) of the INVESTIGATION REPORT.

REQUEST FOR PRODUCTION NO. 18

All DOCUMENTS identified in the COMMITTEE'S responses to the TILLMAN OPPOSING INVESTORS' Interrogatories to the COMMITTEE, Set One, served concurrently herewith.

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ, LLP

DATED: December 31, 2025

By: */s/* Isaac Gradman
ISAAC M. GRADMAN
MICHAEL E. TRACHT
ALEXANDER A. WIEGEL

AND

MICHAEL C. FALLON
MICHAEL C. FALLON, JR.

Attorneys for Tillman Opposing Investors

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EXHIBIT C

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Attorneys for the Tillman Opposing Investors[1]

PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re: LEFEVER MATTSON, a California corporation, et al.[2] Debtors. _____/	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11 **INTERROGATORIES TO DEBTORS, SET ONE**

[1] The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulios; Kay Poulios; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the "Tillman Opposing Investors").

[2] 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.

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In re: KS MATTSON PARTNERS, LP, Debtor. /	Judge: Hon. Charles D. Novack

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Bankruptcy Procedure, Rules 7026 and 9014(c), and Federal Rules of Civil Procedure, Rules 26 and 33, the TILLMAN OPPOSING INVESTORS, through the undersigned, propound these Interrogatories, to which DEBTORS shall respond separately and fully, in writing and under oath, no later than January 30, 2026, pursuant to paragraph 8 of the *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* (Doc. No. 3113), and in accordance with the Instructions and Definitions set forth hereinafter.

INSTRUCTIONS

1. These Interrogatories should be construed to require answers based upon the knowledge of, and information available to, YOU, as well as YOUR agents, representatives, and, unless privileged and protected, attorneys.

2. These Interrogatories are intended as continuing, requiring YOU to provide supplemental answers, setting forth any information within the scope of the Interrogatories as may be acquired by YOU, YOUR agents, attorneys, or representatives, which alters, updates, or augments YOUR answers to these Interrogatories.

3. If YOU elect to specify and produce business records in answer to any Interrogatory, the specification shall be in sufficient detail to permit the propounding parties to locate and identify, as readily as YOU, the business records from which the answer to the Interrogatory may be ascertained

4. If, in answering these Interrogatories, YOU encounter any ambiguities when construing a question, instruction, or definition, YOUR answer shall set forth the matter deemed ambiguous and the construction used in answering.

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5. If YOU contend that any Interrogatory is objectionable in whole or in part, state with specificity all grounds for the objection, and respond to those parts of the Interrogatory as to which no objection is made.

DEFINITIONS

1. As used herein, the term "ACTION" refers to the legal action captioned *In re LeFever Mattson, et al.*, initiated on or about September 12, 2024, and currently pending in the United States Bankruptcy Court, Northern District of California, Case No. 24-BK-10545, together with all legal actions administratively consolidated therewith.

2. As used herein, the term "TILLMAN OPPOSING INVESTORS" has the meaning given to it on page 1, footnote 1, *supra*.

3. As used herein, the term "COMMITTTEE" refers to the Official Committee of Unsecured Creditors as appointed in the ACTION pursuant to the *Amended Appointment of Official Committee of Unsecured Creditors* (Doc. No. 368).

4. As used herein, the terms "COMMUNICATION" and/or "COMMUNICATIONS" refer to any recordation, exchange, transfer, or transmittal of information, whether in writing, oral, or other form, including, but not limited to, in-person and telephone conversations, voice mail messages, text messages, letters, notes, electronically generated communications (e.g., e-mail, texts, IM social media messages) and includes all DOCUMENTS (as defined herein) relating to such COMMUNICATIONS, regardless of whether any such DOCUMENT, or the information contained therein, was transmitted by its author to any other PERSON.

5. As used herein, the terms "CONCERN" and/or "CONCERNING" means anything that, in whole or in part, constitutes, comprises, contains, describes, evidences, embodies, reflects, refers to, relates to, identifies, states, pertains directly or indirectly to, discusses, alludes to, responds to, rebuts, mentions, comments upon, analyzes, explains, supports, summarizes, is logically or factually connected with, substantiates or is in any other way relevant to the given subject matter.

6. As used herein, the terms "DEBTORS," "YOU," and/or "YOUR" refer to

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Debtor LeFever Mattson ("LFM"), Debtor KS Mattson Partner, LP ("KSMP"), all other entities whose chapter 11 bankruptcy actions have been administratively consolidated under the Action, and any affiliates and subsidiaries of KSMP, or entities under the control of KSMP, who may have yet to file for bankruptcy, INCLUDING, but not limited to, Specialty Properties Partners, LP; Treehouse Investments, LP; and Perris Freeway Plaza, LP. The term "DEBTORS" includes directors, officers, members, partners, employees, and agents of the DEBTORS and any PERSON or entity acting on DEBTORS' behalf, INCLUDING agents, assigns, heirs, successors, trustees, employees, firms, partners, joint-venturers, limited liability companies, partnerships, corporations, associations, or other business enterprises, or any combination of the foregoing, to the extent such PERSONS or entities are acting in their official capacity as representatives of the DEBTORS.

7. As used herein, the terms "DOCUMENT" and/or "DOCUMENTS" are intended to have the broadest possible meaning and includes, but is not limited to, the original or copy, and both sides thereof, of written, recorded, or graphic material, however produced or reproduced, of any kind in your possession, custody, or control, or in the possession, custody, or control of any officers, members, partners, employees, servants, or your agents or representatives, including, without limitation, letters, correspondence, telegrams, memoranda, records, minutes, ESI, contracts, agreements, memoranda, or records of telephone or personal conversations or conferences, interoffice COMMUNICATIONS, emails, sound recordings, handwritings, electronic data processing inputs, and memories of all kinds, including hard drives, CD ROM data, tapes and discs, computer reports and printouts, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, teletype messages, bills of lading, invoices, work sheets, and index cards, or copies of such documents where originals are not available. The term "DOCUMENT" or "DOCUMENTS" includes any and all matter that CONCERNS in whole or in part the subject referred to in a demand to produce. Where a DOCUMENT has been prepared in several copies that are not identical (or which by reason of subsequent modification, addition, or notation are no longer identical), each nonidentical copy is a separate DOCUMENT.

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8. As used herein, the term "ENTITY" means "entity," as defined in section 101(15) of the Bankruptcy Code.

9. As used herein, the term "EXTRAORDINARY WITHDRAWALS PRIOR TO THE PONZI START DATE" refers to large or irregular transfers from the DEBTORS to an INVESTOR prior to the PONZI START DATE that represent a return of principal or a return on investment, INCLUDING, but not limited to, proceeds from refinancings, proceeds from property sales, and other substantial one-time payments.

10. As used herein, the term "EXTRAORDINARY WITHDRAWALS AFTER THE PONZI START DATE" refers to large or irregular transfers from the DEBTORS to an INVESTOR between the PONZI START DATE and the date the ACTION began, September 12, 2024, that represent a return of principal or a return on investment, INCLUDING, but not limited to, proceeds from refinancings, proceeds from property sales, and other substantial one-time payments.

11. As used herein, the terms "INCLUDE," "INCLUDES," and/or "INCLUDING" shall be used in the broadest possible sense and are not meant to be limiting. Any list following these terms contains illustrative examples of the types of items or information responsive to the request, but the list is without limitation and does not constitute an exclusive, all encompassing, or exhaustive listing of every type of item or piece of information responsive to the request.

12. As used herein, the term "INVESTIGATION REPORT" refers to Exhibit 1 to the *Notice of Filing Joint Investigation Report and Summary of Global Settlement* (Doc. No. 2568), filed in the ACTION on October 15, 2025.

13. As used herein, the terms "INVESTOR" or "INVESTORS" refers to any PERSON or ENTITY that invested in, with, in consultation with, in coordination with, or otherwise CONCERNING the DEBTORS, whether such investment is recognized within DEBTORS' books and records or not, INCLUDING, but not limited to, any PERSON or ENTITY that filed a proof of claim or proof of interest in the ACTION against the DEBTORS alleging to have invested in or with DEBTORS.

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14. As used herein, the terms "PERSON" and "INDIVIDUAL" are interchangeable and shall mean any natural person, including, without limitation, an entity's directors, officers, members, partners, employees, and agents, as well as any association, joint venture, corporation, partnership, firm, organization, trust, corporation, or any other kind of business or legal entity or governmental body, unless the context indicates otherwise.

15. As used herein, the term "PLAN" refers to the *Third Amended Joint Chapter 11 Plan of Liquidation* (Doc. No. 3108), as filed in the Action on December 11, 2025, INCLUDING any supplements or amendments thereto.

16. As used herein, the term "PLAN PROPONENTS" refers to the DEBTORS and the COMMITTEE, collectively.

17. As used herein, the term "PONZI START DATE" refers to September 12, 2017.

18. The terms "and," "or," and "and/or" shall mean and/or shall be construed both conjunctively and disjunctively so as to bring within the scope of any request for production herein all documents and things that might otherwise be construed to be outside of such scope.

19. The terms "any" and "each" as used herein shall also include "every" and "all," and vice versa.

20. The use of a singular noun shall be construed to include the plural noun, and the use of a plural noun shall be construed to include the singular noun.

21. The use of a verb in any tense shall be construed as the use of that verb in all other tenses whenever necessary to bring within the scope of a discovery request documents or information that might otherwise be construed to be outside its scope.

TIME PERIOD COVERED

Unless otherwise noted by a particular Interrogatory, the relevant time period for each of the below Interrogatories is from the initial date of incorporation of each of the DEBTORS, to the present.

INTERROGATORIES

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INTERROGATORY NO. 1

1. IDENTIFY all EXTRAORDINARY WITHDRAWALS PRIOR TO THE PONZI START DATE. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each EXTRAORDINARY WITHDRAWAL PRIOR TO THE PONZI START DATE: (i) the DEBTOR involved in each withdrawal, (ii) the INVESTOR involved in each withdrawal, (iii) the date of each withdrawal, (iv) the dollar amount of each withdrawal, and (v) the purpose of each withdrawal.

INTERROGATORY NO. 2

IDENTIFY all EXTRAORDINARY WITHDRAWALS AFTER THE PONZI START DATE. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each EXTRAORDINARY WITHDRAWAL AFTER THE PONZI START DATE: (i) the DEBTOR involved in each withdrawal, (ii) the INVESTOR involved in each withdrawal, (iii) the date of each withdrawal, (iv) the dollar amount of each withdrawal, and (v) the purpose of each withdrawal.

INTERROGATORY NO. 3

IDENTIFY the total amount of income received by DEBTORS from the rental of real property. For the purposes of this Interrogatory, the term "IDENTIFY" means to provide the total dollar amount of all rental income received by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the present.

INTERROGATORY NO. 4

IDENTIFY the total amount of fees received by DEBTORS from the management of real property. For the purposes of this Interrogatory, the term "IDENTIFY" means to provide the total dollar amount of fees from the management of real property received by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the present.

INTERROGATORY NO. 5

IDENTIFY the total amount of expenses paid by DEBTORS for maintenance and upkeep of real property. For the purposes of this Interrogatory, the term "IDENTIFY" means to provide the total dollar amount of expenses for maintenance and upkeep of real property

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paid by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the present.

INTERROGATORY NO. 6

IDENTIFY all improvements to real property performed by DEBTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each improvement to real property: (i) the DEBTOR who performed or oversaw the improvement; (ii) the real property to which the improvement was performed, (iii) a description of the improvement performed, (iv) the date of the improvement, (v) the total cost of the improvement, and (vi) any change in value of the associated real property as a result of such improvement, if known.

INTERROGATORY NO. 7

IDENTIFY all monthly distribution or dividend payments paid by DEBTORS to INVESTORS prior to the PONZI START DATE. For the purposes of this interrogatory, the term "IDENTIFY" means to provide, for each DEBTOR, the total dollar amount of distribution or dividend payments paid by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the PONZI START DATE.

INTERROGATORY NO. 8

IDENTIFY all monthly distribution or dividend payments DEBTORS paid to INVESTORS after the PONZI START DATE. For the purposes of this interrogatory, the term "IDENTIFY" means to provide, for each DEBTOR, the total dollar amount of distribution or dividend payments paid by each DEBTOR for each year from the PONZI START DATE to the September 12, 2024.

INTERROGATORY NO. 9

IDENTIFY all monthly distribution or dividend payments DEBTORS paid to the INVESTORS appointed to the COMMITTEE prior to the PONZI START DATE. For the purposes of this interrogatory, the term "IDENTIFY" means to provide, for each DEBTOR, the total dollar amount of distribution or dividend payments paid by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the PONZI START DATE.

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INTERROGATORY NO. 10

IDENTIFY all monthly distribution or dividend payments DEBTORS paid to the INVESTORS appointed to the COMMITTEE after the PONZI START DATE. For the purposes of this interrogatory, the term "IDENTIFY" means to provide, for each DEBTOR, the total dollar amount of distribution or dividend payments paid by each DEBTOR for each year from the PONZI START DATE to September 12, 2024.

INTERROGATORY NO. 11

IDENTIFY all conveyances of tenant-in-common interests from INVESTORS to DEBTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each conveyance of tenant-in-common interests: (i) the DEBTOR involved in the conveyance, (ii) the INVESTOR involved in the conveyance, (iii) the date of the conveyance, and (iv) the payment or exchange of value associated with the conveyance.

INTERROGATORY NO. 12

IDENTIFY all conveyances of tenant-in-common interests from DEBTORS to INVESTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each conveyance of tenant-in-common interests: (i) the DEBTOR involved in the conveyance, (ii) the INVESTOR involved in the conveyance, (iii) the date of the conveyance, and (iv) the payment or exchange of value associated with the conveyance.

INTERROGATORY NO. 13

IDENTIFY all transfers of any direct interests in real property from INVESTORS to DEBTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each transfer of real property interests: (i) the DEBTOR involved in the transfer, (ii) the INVESTOR involved in the transfer, (iii) the date of the transfer, (iv) the payment or exchange of value associated with the transfer, and (v) whether the related real property interest was, in fact, conveyed to the associated DEBTOR.

INTERROGATORY NO. 14

IDENTIFY all transfers of any direct interests in real property from DEBTORS to INVESTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe

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with particularity, for each transfer of real property interests: (i) the DEBTOR involved in the transfer, (ii) the INVESTOR involved in the transfer, (iii) the date of the transfer, (iv) the payment or exchange of value associated with the transfer, and (v) whether the related real property interest was, in fact, conveyed to the associated INVESTOR.

INTERROGATORY NO. 15

IDENTIFY all "legacy Investors" as described in Section C.2. of the INVESTIGATION REPORT. For purposes of this Interrogatory, the term "IDENTIFY" means to provide, for each "legacy Investor[ ]": (i) the name of the INVESTOR, (ii) the date of birth of the INVESTOR, (iii) the employment status of the INVESTOR, and (iv) a list identifying all proofs of claim and proofs of interest submitted in the ACTION by such INVESTOR.

INTERROGATORY NO. 16

IDENTIFY all DOCUMENTS PLAN PROPONENTS intend to use to support the finding sought in Section 9.1(c) of the PLAN that DEBTORS "operated as a Ponzi scheme." For purposes of this Interrogatory, the term "IDENTIFY" means to provide, for each DOCUMENT: (i) a description of such DOCUMENT, (ii) the date of such DOCUMENT, (iii) if previously produced, the bates numbering associated with each such DOCUMENT, and (iv) if not previously produced, a copy of SUCH DOCUMENT.

INTERROGATORY NO. 17

IDENTIFY all payments received by INVESTORS from DEBTORS that did not consist of amounts received by DEBTORS from other INVESTORS. For purposes of this Interrogatory, the term "IDENTIFY" means to provide, for each payment: (i) the DEBTOR making such payment, (ii) the INVESTOR receiving such payment, (iii) the date of such payment, (iv) the dollar amount of such payment, and (v) the source of such payment.

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ, LLP

DATED: December 31, 2025

By: */s/* Isaac Gradman
ISAAC M. GRADMAN
MICHAEL E. TRACHT
ALEXANDER A. WIEGEL

AND

MICHAEL C. FALLON
MICHAEL C. FALLON, JR.

Attorneys for Tillman Opposing Investors

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EXHIBIT D

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re: LEFEVER MATTSON, a California corporation, et al.[2] Debtors. _____/	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11 **INTERROGATORIES TO THE COMMITTEE, SET ONE**

[1] The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulios; Kay Poulios; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the "Tillman Opposing Investors").

[2] 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.

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In re: KS MATTSON PARTNERS, LP, Debtor. /	Judge: Hon. Charles D. Novack

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Bankruptcy Procedure, Rules 7026 and 9014(c), and Federal Rules of Civil Procedure, Rules 26 and 33, the TILLMAN OPPOSING INVESTORS, through the undersigned, propound these Interrogatories, to which the COMMITTEE shall respond separately and fully, in writing and under oath, no later than January 30, 2026, pursuant to paragraph 8 of the *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* (Doc. No. 3113), and in accordance with the Instructions and Definitions set forth hereinafter.

INSTRUCTIONS

1. These Interrogatories should be construed to require answers based upon the knowledge of, and information available to, YOU, as well as YOUR agents, representatives, and, unless privileged and protected, attorneys.

2. These Interrogatories are intended as continuing, requiring YOU to provide supplemental answers, setting forth any information within the scope of the Interrogatories as may be acquired by YOU, YOUR agents, attorneys, or representatives, which alters, updates, or augments YOUR answers to these Interrogatories.

3. If YOU elect to specify and produce business records in answer to any Interrogatory, the specification shall be in sufficient detail to permit the propounding parties to locate and identify, as readily as YOU, the business records from which the answer to the Interrogatory may be ascertained

4. If, in answering these Interrogatories, YOU encounter any ambiguities when construing a question, instruction, or definition, YOUR answer shall set forth the matter deemed ambiguous and the construction used in answering.

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5. If YOU contend that any Interrogatory is objectionable in whole or in part, state with specificity all grounds for the objection, and respond to those parts of the Interrogatory as to which no objection is made.

DEFINITIONS

1. As used herein, the term "ACTION" refers to the legal action captioned *In re LeFever Mattson, et al.*, initiated on or about September 12, 2024, and currently pending in the United States Bankruptcy Court, Northern District of California, Case No. 24-BK-10545, together with all legal actions administratively consolidated therewith.

2. As used herein, the term "TILLMAN OPPOSING INVESTORS" has the meaning given to it on page 1, footnote 1, *supra*.

3. As used herein, the terms "COMMITTTEE," "YOU," and "YOUR" refer to the Official Committee of Unsecured Creditors as appointed in the ACTION pursuant to the *Amended Appointment of Official Committee of Unsecured Creditors* (Doc. No. 368).

4. As used herein, the terms "COMMUNICATION" and/or "COMMUNICATIONS" refer to any recordation, exchange, transfer, or transmittal of information, whether in writing, oral, or other form, including, but not limited to, in-person and telephone conversations, voice mail messages, text messages, letters, notes, electronically generated communications (e.g., e-mail, texts, IM social media messages) and includes all DOCUMENTS (as defined herein) relating to such COMMUNICATIONS, regardless of whether any such DOCUMENT, or the information contained therein, was transmitted by its author to any other PERSON.

5. As used herein, the terms "CONCERN" and/or "CONCERNING" means anything that, in whole or in part, constitutes, comprises, contains, describes, evidences, embodies, reflects, refers to, relates to, identifies, states, pertains directly or indirectly to, discusses, alludes to, responds to, rebuts, mentions, comments upon, analyzes, explains, supports, summarizes, is logically or factually connected with, substantiates or is in any other way relevant to the given subject matter.

6. As used herein, the term "DEBTORS," refers to Debtor LeFever Mattson

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("LFM"), Debtor KS Mattson Partner, LP ("KSMP"), all other entities whose chapter 11 bankruptcy actions have been administratively consolidated under the Action, and any affiliates and subsidiaries of KSMP, or entities under the control of KSMP, who may have yet to file for bankruptcy, INCLUDING, but not limited to, Specialty Properties Partners, LP; Treehouse Investments, LP; and Perris Freeway Plaza, LP. The term "DEBTORS" includes directors, officers, members, partners, employees, and agents of the DEBTORS and any PERSON or entity acting on DEBTORS' behalf, INCLUDING agents, assigns, heirs, successors, trustees, employees, firms, partners, joint-venturers, limited liability companies, partnerships, corporations, associations, or other business enterprises, or any combination of the foregoing, to the extent such PERSONS or entities are acting in their official capacity as representatives of the DEBTORS.

7. As used herein, the terms "DOCUMENT" and/or "DOCUMENTS" are intended to have the broadest possible meaning and includes, but is not limited to, the original or copy, and both sides thereof, of written, recorded, or graphic material, however produced or reproduced, of any kind in your possession, custody, or control, or in the possession, custody, or control of any officers, members, partners, employees, servants, or your agents or representatives, including, without limitation, letters, correspondence, telegrams, memoranda, records, minutes, ESI, contracts, agreements, memoranda, or records of telephone or personal conversations or conferences, interoffice COMMUNICATIONS, emails, sound recordings, handwritings, electronic data processing inputs, and memories of all kinds, including hard drives, CD ROM data, tapes and discs, computer reports and printouts, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, teletype messages, bills of lading, invoices, work sheets, and index cards, or copies of such documents where originals are not available. The term "DOCUMENT" or "DOCUMENTS" includes any and all matter that CONCERNS in whole or in part the subject referred to in a demand to produce. Where a DOCUMENT has been prepared in several copies that are not identical (or which by reason of subsequent modification, addition, or notation are no longer identical), each nonidentical copy is a separate DOCUMENT.

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8. As used herein, the term "ENTITY" means "entity," as defined in section 101(15) of the Bankruptcy Code.

9. As used herein, the term "EXTRAORDINARY WITHDRAWALS PRIOR TO THE PONZI START DATE" refers to large or irregular transfers from the DEBTORS to an INVESTOR prior to the PONZI START DATE that represent a return of principal or a return on investment, INCLUDING, but not limited to, proceeds from refinancings, proceeds from property sales, and other substantial one-time payments.

10. As used herein, the term "EXTRAORDINARY WITHDRAWALS AFTER THE PONZI START DATE" refers to large or irregular transfers from the DEBTORS to an INVESTOR between the PONZI START DATE and the date the ACTION began, September 12, 2024, that represent a return of principal or a return on investment, INCLUDING, but not limited to, proceeds from refinancings, proceeds from property sales, and other substantial one-time payments.

11. As used herein, the terms "INCLUDE," "INCLUDES," and/or "INCLUDING" shall be used in the broadest possible sense and are not meant to be limiting. Any list following these terms contains illustrative examples of the types of items or information responsive to the request, but the list is without limitation and does not constitute an exclusive, all encompassing, or exhaustive listing of every type of item or piece of information responsive to the request.

12. As used herein, the term "INVESTIGATION REPORT" refers to Exhibit 1 to the *Notice of Filing Joint Investigation Report and Summary of Global Settlement* (Doc. No. 2568), filed in the ACTION on October 15, 2025.

13. As used herein, the terms "INVESTOR" or "INVESTORS" refers to any PERSON or ENTITY that invested in, with, in consultation with, in coordination with, or otherwise CONCERNING the DEBTORS, whether such investment is recognized within DEBTORS' books and records or not, INCLUDING, but not limited to, any PERSON or ENTITY that filed a proof of claim or proof of interest in the ACTION against the DEBTORS alleging to have invested in or with DEBTORS.

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14. As used herein, the terms "PERSON" and "INDIVIDUAL" are interchangeable and shall mean any natural person, including, without limitation, an entity's directors, officers, members, partners, employees, and agents, as well as any association, joint venture, corporation, partnership, firm, organization, trust, corporation, or any other kind of business or legal entity or governmental body, unless the context indicates otherwise.

15. As used herein, the term "PLAN" refers to the *Third Amended Joint Chapter 11 Plan of Liquidation* (Doc. No. 3108), as filed in the Action on December 11, 2025, INCLUDING any supplements or amendments thereto.

16. As used herein, the term "PLAN PROPONENTS" refers to the DEBTORS and the COMMITTEE, collectively.

17. As used herein, the term "PONZI START DATE" refers to September 12, 2017.

18. The terms "and," "or," and "and/or" shall mean and/or shall be construed both conjunctively and disjunctively so as to bring within the scope of any request for production herein all documents and things that might otherwise be construed to be outside of such scope.

19. The terms "any" and "each" as used herein shall also include "every" and "all," and vice versa.

20. The use of a singular noun shall be construed to include the plural noun, and the use of a plural noun shall be construed to include the singular noun.

21. The use of a verb in any tense shall be construed as the use of that verb in all other tenses whenever necessary to bring within the scope of a discovery request documents or information that might otherwise be construed to be outside its scope.

TIME PERIOD COVERED

Unless otherwise noted by a particular Interrogatory, the relevant time period for each of the below Interrogatories is from the initial date of incorporation of each of the DEBTORS, to the present.

INTERROGATORIES

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INTERROGATORY NO. 1

1. IDENTIFY all EXTRAORDINARY WITHDRAWALS PRIOR TO THE PONZI START DATE. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each EXTRAORDINARY WITHDRAWAL PRIOR TO THE PONZI START DATE: (i) the DEBTOR involved in each withdrawal, (ii) the INVESTOR involved in each withdrawal, (iii) the date of each withdrawal, (iv) the dollar amount of each withdrawal, and (v) the purpose of each withdrawal.

INTERROGATORY NO. 2

IDENTIFY all EXTRAORDINARY WITHDRAWALS AFTER THE PONZI START DATE. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each EXTRAORDINARY WITHDRAWAL AFTER THE PONZI START DATE: (i) the DEBTOR involved in each withdrawal, (ii) the INVESTOR involved in each withdrawal, (iii) the date of each withdrawal, (iv) the dollar amount of each withdrawal, and (v) the purpose of each withdrawal.

INTERROGATORY NO. 3

IDENTIFY the total amount of income received by DEBTORS from the rental of real property. For the purposes of this Interrogatory, the term "IDENTIFY" means to provide the total dollar amount of all rental income received by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the present.

INTERROGATORY NO. 4

IDENTIFY the total amount of fees received by DEBTORS from the management of real property. For the purposes of this Interrogatory, the term "IDENTIFY" means to provide the total dollar amount of fees from the management of real property received by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the present.

INTERROGATORY NO. 5

IDENTIFY the total amount of expenses paid by DEBTORS for maintenance and upkeep of real property. For the purposes of this Interrogatory, the term "IDENTIFY" means to provide the total dollar amount of expenses for maintenance and upkeep of real property

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paid by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the present.

INTERROGATORY NO. 6

IDENTIFY all improvements to real property performed by DEBTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each improvement to real property: (i) the DEBTOR who performed or oversaw the improvement; (ii) the real property to which the improvement was performed, (iii) a description of the improvement performed, (iv) the date of the improvement, (v) the total cost of the improvement, and (vi) any change in value of the associated real property as a result of such improvement, if known.

INTERROGATORY NO. 7

IDENTIFY all monthly distribution or dividend payments paid by DEBTORS to INVESTORS prior to the PONZI START DATE. For the purposes of this interrogatory, the term "IDENTIFY" means to provide, for each DEBTOR, the total dollar amount of distribution or dividend payments paid by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the PONZI START DATE.

INTERROGATORY NO. 8

IDENTIFY all monthly distribution or dividend payments DEBTORS paid to INVESTORS after the PONZI START DATE. For the purposes of this interrogatory, the term "IDENTIFY" means to provide, for each DEBTOR, the total dollar amount of distribution or dividend payments paid by each DEBTOR for each year from the PONZI START DATE to the September 12, 2024.

INTERROGATORY NO. 9

IDENTIFY all monthly distribution or dividend payments DEBTORS paid to the INVESTORS appointed to the COMMITTEE prior to the PONZI START DATE. For the purposes of this interrogatory, the term "IDENTIFY" means to provide, for each DEBTOR, the total dollar amount of distribution or dividend payments paid by each DEBTOR for each year from the initial date of incorporation of that DEBTOR to the PONZI START DATE.

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INTERROGATORY NO. 10

IDENTIFY all monthly distribution or dividend payments DEBTORS paid to the INVESTORS appointed to the COMMITTEE after the PONZI START DATE. For the purposes of this interrogatory, the term "IDENTIFY" means to provide, for each DEBTOR, the total dollar amount of distribution or dividend payments paid by each DEBTOR for each year from the PONZI START DATE to September 12, 2024.

INTERROGATORY NO. 11

IDENTIFY all conveyances of tenant-in-common interests from INVESTORS to DEBTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each conveyance of tenant-in-common interests: (i) the DEBTOR involved in the conveyance, (ii) the INVESTOR involved in the conveyance, (iii) the date of the conveyance, and (iv) the payment or exchange of value associated with the conveyance.

INTERROGATORY NO. 12

IDENTIFY all conveyances of tenant-in-common interests from DEBTORS to INVESTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each conveyance of tenant-in-common interests: (i) the DEBTOR involved in the conveyance, (ii) the INVESTOR involved in the conveyance, (iii) the date of the conveyance, and (iv) the payment or exchange of value associated with the conveyance.

INTERROGATORY NO. 13

IDENTIFY all transfers of any direct interests in real property from INVESTORS to DEBTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe with particularity, for each transfer of real property interests: (i) the DEBTOR involved in the transfer, (ii) the INVESTOR involved in the transfer, (iii) the date of the transfer, (iv) the payment or exchange of value associated with the transfer, and (v) whether the related real property interest was, in fact, conveyed to the associated DEBTOR.

INTERROGATORY NO. 14

IDENTIFY all transfers of any direct interests in real property from DEBTORS to INVESTORS. For the purposes of this Interrogatory, the term "IDENTIFY" means to describe

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with particularity, for each transfer of real property interests: (i) the DEBTOR involved in the transfer, (ii) the INVESTOR involved in the transfer, (iii) the date of the transfer, (iv) the payment or exchange of value associated with the transfer, and (v) whether the related real property interest was, in fact, conveyed to the associated INVESTOR.

INTERROGATORY NO. 15

IDENTIFY all "legacy Investors" as described in Section C.2. of the INVESTIGATION REPORT. For purposes of this Interrogatory, the term "IDENTIFY" means to provide, for each "legacy Investor[ ]": (i) the name of the INVESTOR, (ii) the date of birth of the INVESTOR, (iii) the employment status of the INVESTOR, and (iv) a list identifying all proofs of claim and proofs of interest submitted in the ACTION by such INVESTOR.

INTERROGATORY NO. 16

IDENTIFY all DOCUMENTS PLAN PROPONENTS intend to use to support the finding sought in Section 9.1(c) of the PLAN that DEBTORS "were operated as a Ponzi scheme." For purposes of this Interrogatory, the term "IDENTIFY" means to provide, for each DOCUMENT: (i) a description of such DOCUMENT, (ii) the date of such DOCUMENT, (iii) if previously produced, the bates numbering associated with each such DOCUMENT, and (iv) if not previously produced, a copy of SUCH DOCUMENT.

INTERROGATORY NO. 17

IDENTIFY all payments received by INVESTORS from DEBTORS that did not consist of amounts received by DEBTORS from other INVESTORS. For purposes of this Interrogatory, the term "IDENTIFY" means to provide, for each payment: (i) the DEBTOR making such payment, (ii) the INVESTOR receiving such payment, (iii) the date of such payment, (iv) the dollar amount of such payment, and (v) the source of such payment.

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ, LLP

DATED: December 31, 2025

By: */s/* Isaac Gradman
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MICHAEL E. TRACHT
ALEXANDER A. WIEGEL

AND

MICHAEL C. FALLON
MICHAEL C. FALLON, JR.

Attorneys for Tillman Opposing Investors

PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

Case: 24-10545 Doc# 3314-1 Filed: 01/06/26 Entered: 01/06/26 15:03:12 Page 50 of 54

EXHIBIT E

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Attorneys for the Tillman Opposing Investors[1]

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re: LEFEVER MATTSON, a California corporation, et al.[2] Debtors. /	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11 **IDENTIFICATION OF EXPERT REPORT TOPICS**

[1] The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulios; Kay Poulios; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the "Tillman Opposing Investors").

[2] 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.

In re: KS MATTSON PARTNERS, LP, Debtor. /	Judge: Hon. Charles D. Novack

Pursuant to paragraph 8 of the *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* (Doc. No. 3113), the Tillman Opposing Investors identify the following topics that they expect will be covered in their forthcoming initial expert report(s):

- Opinions related to the propriety, or lack thereof, of the Ponzi scheme finding and related presumption(s) that the Plan Proponents[3] are requesting be made as part of the proposed Plan and/or whether the Debtors' business operations met the elements of a Ponzi scheme, and if so, when and to what extent, including, but not limited to, opinions and analysis regarding:
  - potential legitimate sources of, or opportunities for, income or profit for Investors with respect to Debtors' business or assets or investments therein;
  - the source(s) of payments received by Investors from Debtors;
  - Debtors' and/or Debtors' principals' use of funds received from Investors, third-party lenders, and/or others;
  - Debtors' adherence to corporate formalities;
  - the nature and structure of Debtors' general business operations;
  - the solvency and/or insolvency of Debtors;
  - the value and performance of Debtors' assets;
  - the nature and structure of Debtors' financing;
  - the nature and structure of investments offered to Investors; and/or

[3] Capitalized terms not otherwise defined herein shall be giving the same meaning as ascribed to them in the *Third Amended Joint Chapter 11 Plan of Liquidation* (Doc. No. 3108).

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

- the nature and structure of any other financial arrangements in which Debtors participated and/or business Debtors conducted;

- Opinions and analysis related to the propriety, or lack thereof, of the particular application of the Ponzi scheme finding and related presumption(s) that the Plan Proponent are requesting be made as part of the proposed Plan, including, but not limited to, the proposed Ponzi Start Date; and
- Opinions and analysis related to the potential consequences of the particular application of the Ponzi scheme finding and related presumption(s) that the Plan Proponent are requesting be made as part of the proposed Plan, including, but not limited to, the proposed Ponzi Start Date.

PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ, LLP

DATED: December 31, 2025

By: */s/* Isaac Gradman
ISAAC M. GRADMAN
MICHAEL E. TRACHT
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Attorneys for the Tillman Opposing Investors[1]

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re:	Case No. 24-10545 CN (Lead Case)
LEFEVER MATTSON, a California corporation, et al.[2]	(Jointly Administered)
	Chapter 11
Debtors.	**CERTIFICATE OF SERVICE**
_____/	

[1] The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulios; Kay Poulios; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the "Tillman Opposing Investors").

[2] 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.

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

PROOF OF EMAIL SERVICE

24-10545 (CN)

I declare that:

I am and was at the time of service of the papers herein, over the age of eighteen (18) years and am not a party to the action. I am employed in the County of Sonoma, California, and my business address is 438 First Street, 4th Floor, Santa Rosa, California 95401.

On January 6, 2026, I served the following documents, described as set forth below on the interested parties in this action, addressed as follows:

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☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** the Law office of Michael C. Fallon, who is registered with the CM/ECF System, electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 6, 2026, at Santa Rosa, California.

Hope Dombrowski

PROOF OF MAIL SERVICE

24-10545 (CN)

I declare that:

I am and was at the time of service of the papers herein, over the age of eighteen (18) years and am not a party to the action. I am employed in the County of Sonoma, California, and my business address is 438 1st Street, 4th Floor, Santa Rosa, California 95401.

On January 6, 2026, I served the following documents, described as set forth below on the interested parties in this action, addressed as follows:

NOTICE OF SERVICE OF DISCOVERY

Anderson 2001 Revocable Trust dated June 12, 2001 c/o Graham & Teresa Anderson, Trustees **129 Archer Drive** **Santa Cruz, California 95060**	**The Willis McKelvey Rice and Linda Kay Rice Living Trust** **c/o Willis & Linda Rice, Trustees** **405 London Way** **Sonoma, California 95476**

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Fleming Family Trust **c/o John & Dominque Fleming, Trustees** **350 Castenada Avenue** **San Francisco, California 94116-1447**	**Fox Family Trust** **c/o Gary & Katherine Fox, Trustees** **P.O. Box 1243** **Fair Oaks, California 95628**
Girardi Revocable Living Trust **c/o John & Marsi Giard, Trustees** **3265 Longhorn Ridge Road** **Cameron Park, California 95682**	**Katherine Ogg** **49 Lyell Street** **Los Altos, California 94022**
Ray & Kim Davis **14210 Angelina Drive** **Bay Town, Texas 77523**	**W Real Estate – Sonoma** **539 Broadway Suite B** **Sonoma, CA 95476**
Ally Bank Lease Trust - Assignor to Vehicle Asset Universal Leasing Trust (a.k.a. "VAULT TRUST", or "V.A.U.L. Trust", or "VAULT", or "V.A.U.L.T."), c/o AIS Port **4515 N Santa Fe Ave. Dept. APS** **Oklahoma City, OK 73118**	**Ally Bank, c/o AIS Portfolio Services, LLC 4515 N Santa Fe Ave. Dept. APS** **Oklahoma City, OK 73118** **4515 N Santa Fe Ave. Dept. APS** **Oklahoma City, OK 73118**
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Attn: Credit Bureau Disputes Home Mortgage **Wells Fargo Home Mortgage** **PO Box 10335** **Des Moines, IA 50306**	**Wells Fargo Wholesale Lockbox** **PO Box 60253** **Charlotte, NC 28260-0253**

☒ **BY FIRST-CLASS MAIL:** I caused such envelopes to be deposited in the United States mail, at Santa Rosa, California, with postage thereon fully prepaid, individually, addressed to the parties as indicated. I am readily familiar with the firm's practice of collection and processing correspondence in mailing. It is deposited with the United States postal service each day and that practice was followed in the ordinary course of business for the service herein attested to.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 6, 2026, at Santa Rosa, California.

Hope Dombrowski

Hope Dombrowski

PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

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