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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SANTA ROSA DIVISION

In re: LEFEVER MATTSON, a California corporation, *et al.*, Debtors.	Case No. 24-10545 (CN) (Jointly Administered) Chapter 11 **STIPULATION TO EXTEND COMERICA BANK'S VOTING DEADLINE AND DEADLINE TO OBJECT TO THE THIRD AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION**
In re: KS MATTSON PARTNERS, LP, Debtor.	

The Official Committee of Unsecured Creditors appointed in the above-captioned chapter 11 cases (the "Committee"), LeFever Mattson, a California corporation, and its affiliated debtors and debtors in possession (the "LFM Debtors"), KS Mattson Partners, LP ("KSMP" and together with the LFM Debtor and the Committee, the "Plan Proponents"), and Comerica Bank ("Comerica," and together with the Plan Proponents, the "Parties"), hereby stipulate and agree ("Stipulation") as follows:

1. On December 10, 2025, the Court entered its *Order (I) Approving the Plan Summary and Approving Disclosure Statement; (II) Scheduling Status Conference on Confirmation of Plan and Approving the Form and Manner of Service of the Confirmation Notice;*

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(III) Establishing Procedures for the Solicitation and Tabulation of Votes on Plan; (IV) Estimating Investor Claims and Interests Solely for Voting Purposes; and (V) Approving Related Matters [Docket No. 3105] (the "Solicitation Procedures Order").

2. The Solicitation Procedures Order provides that any objections to the *Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. 3108] (the "Plan") shall be filed and served by January 21, 2026 (the "Objection Deadline"). The Solicitation Procedures Order further provides that all ballots for accepting or rejected the Plan must be received on or before January 21, 2026 at 11:59 p.m. (Pacific Time) (the "Voting Deadline").

3. Comerica has requested that the Plan Proponents extend the Objection Deadline and Voting Deadline to January 30, 2026.

4. The Parties hereby agree that the Objection Deadline and Voting Deadline, only as to Comerica, is extended to January 30, 2026 at 11:59 p.m. (Pacific Time).

5. This Stipulation is subject to the approval of the Bankruptcy Court, and the Parties agree to present the Stipulation to the Bankruptcy Court for approval.

6. The Parties agree that the Bankruptcy Court shall retain jurisdiction with respect to all matters arising under or related to the interpretation or implementation of this Stipulation.

7. This Stipulation shall be effective immediately upon entry of an order approving this Stipulation.

[Signature page to follow]

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Dated: January 21, 2026

PACHULSKI STANG ZIEHL & JONES LLP

By: */s/ John D. Fiero*
John D. Fiero

Counsel to the Committee

Dated: January 21, 2026

KELLER BENVENUTTI KIM LLP

By: */s/ David A. Taylor*
David A. Taylor

Counsel to the LFM Debtors

Dated: January 21, 2026

HOGAN LOVELLS (US) LLP

By: */s/ Erin Brady*
Erin Brady

Counsel to KSMP

Dated: January 21, 2026

SHEPPARD MULLIN

By: */s/ Kyle Mathews*
Kyle Mathews

Counsel to Comerica Bank