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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
In re: KS MATTSON PARTNERS, LP, Debtor.	**STIPULATION TO EXTEND TINA M. STOTT'S AND THE TINA M. STOTT FAMILY TRUST DATED 3/17/2017'S VOTING DEADLINE AND DEADLINE TO OBJECT TO THE THIRD AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION**

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 Debtors and the Committee, the "Plan Proponents"), and Tina M. Stott, as an individual and as Trustee of the Tina M. Stott Family Trust dated 3/17/2017 (collectively referred to as "Stott," 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; (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. KSMP and Stott, among others, are parties to a settlement agreement, dated January 16, 2026 (the "Settlement Agreement"), which, among other things, resolves the rights and claims of KSMP and Stott to real property located at 236 King Avenue, Piedmont, California 94610.

4. KSMP will shortly file a motion pursuant to Federal Rule of Bankruptcy Procedure 9019 seeking approval of the Settlement Agreement (the "9019 Motion").

5. Stott filed the following proofs of claim against KSMP in the KSMP's chapter 11 case, which are dealt with in the 9019 Motion: Claims Nos. 663, 667, and 776 (the "Impacted Stott Proofs of Claim").

6. On January 19, 2026, the Parties entered into the *Stipulation to Extend Tina M. Stott's and the Tina M. Stott Family Trust Dated 3/17/2017's Voting Deadline and Deadline to Object to the Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. 3401] (the "Original Stott Stipulation"), whereby the Objection Deadline and Voting Deadline, only as to Stott, was extended to January 28, 2026 at 11:59 p.m. (Pacific Time). On January 20, 2026, the United States Bankruptcy Court for the Northern District of California (the "Bankruptcy Court") entered an order approving the Original Stott Stipulation [Docket No. 3406].

7. Stott has requested that the Plan Proponents further extend the Objection Deadline and Voting Deadline to 11:59 p.m. on the date that is seven calendar days after the date that the Bankruptcy Court holds a hearing on the 9019 Motion (the "Extended Deadline").

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8. The Parties hereby further agree that (1) the Voting Deadline and the Objection Deadline, only as to Stott, are extended to the Extended Deadline and (2) Stott shall be entitled to vote the Impacted Stott Proofs of Claim in the aggregate amount of $763,121.73 as a Class 4 general unsecured claim. Stott acknowledges and agrees that these amounts are for voting purposes only and may not be relied upon for distribution purposes.

9. Stott further agrees that, even though the Settlement Agreement requires KSMP to file the 9019 Motion on or before January 23, 2026, the Setttlement Agreement shall be deemed amended to permit KSMP to file the 9019 Motion on or before Tuesday, January 27, 2026.

10. 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.

11. 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.

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

[Signature page to follow]

Dated: January 23, 2026

PACHULSKI STANG ZIEHL & JONES LLP

By: */s/ Jason H. Rossell*
Jason H. Rosell

Counsel to the Committee

Dated: January 23, 2026

KELLER BENVENUTTI KIM LLP

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Dated: January 23, 2026

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Dated: January 23, 2026

GRIBBLE LEGAL COUNSEL

By: */s/ Christopher W. Gribble*
Christopher W. Gribble

Counsel to Tina M. Stott and the Tina M. Stott Family Trust Dated 3/17/2017