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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.	**SECOND STIPULATION TO EXTEND WILMINGTON TRUST'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 Debtor and the Committee, the "Plan Proponents"), and Wilmington Trust National Association, as Trustee for the Benefit of the Registered Holders of JPMBB Commercial Mortgage Securities Trust 2015-C30, Commercial Mortgage Pass-Through Certificates, Series 2015-C30 ("Wilmington Trust," 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. The Parties have previously agreed that the Objection Deadline and Voting Deadline, only as to Wilmington Trust, would be extended to January 30, 2026 at 11:59 p.m. (Pacific Time), and the Bankruptcy Court entered an order approving that stipulation.

4. The Parties have agreed to further extend the Objection Deadline and Voting Deadline to February 6, 2026 at 11:59 p.m.(Pacific Time); *provided that*, should the Plan Proponents file a motion pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure seeking approval of a settlement agreement between the Parties (the "9019 Motion"), then the Objection Deadline and Voting Deadline will be automatically extended to seven calendar days after the Bankruptcy Court holds a hearing on the 9019 Motion. The Parties hereby agree to those revised deadlines.

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.

Dated: January 29, 2026

PACHULSKI STANG ZIEHL & JONES LLP

By: */s/ John Fiero*
John Fiero

Counsel to the Committee

Dated: January 29, 2026

KELLER BENVENUTTI KIM LLP

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

Counsel to the LFM Debtors

Dated: January 29, 2026

HOGAN LOVELLS (US) LLP

By: */s/ Edward McNeilly*
Edward McNeilly

Counsel to KSMP

Dated: January 29, 2026

McDERMOTT WILL & SHULTE

By: */s/ Eric Seitz*
Eric Seitz

Counsel to Wilmington Trust