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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re: LEFEVER MATTSON, a California corporation, *et al.*,[1] Debtors.	Case No. 24-10545 (CN) (Jointly Administered) Chapter 11 **PLAN PROPONENTS' NOTICE OF IDENTIFICATION OF EXPERTS IN CONNECTION WITH PLAN CONFIRMATION**
In re: KS MATTSON PARTNERS, LP, Debtor.	

[1] The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://veritaglobal.net/LM. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

PLEASE TAKE NOTICE THAT, pursuant to the Court's *Order (I) Approving the Plan Summary and Approving Disclosure Statement; (II) Scheduling Hearing on Confirmation of Plan and Approving the Form and Manner of Service of the Confirmation Hearing Notice; (III) Establishing Procedures for the Solicitation and Tabulation of Votes on Plan; (IV) Establishing Procedures for Estimation of Investor Claims and Interests Solely for Voting Purposes; and (V) Approving Related Matters* [Docket No. 3105] (the "Scheduling Order"), the above-captioned debtors and debtors-in-possession (the "Debtors") and Official Committee of Unsecured Creditors (the "Committee" and together with the Debtors, the "Plan Proponents") hereby identify the following expert witnesses that the Plan Proponents have requested submit affirmative[2] expert reports (the "Experts") in connection with confirmation of the *Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. 3054] (as it may be amended or modified, including all exhibits thereto, the "Plan"):[3]

Expert No. 1: Thomas P. Jeremiassen (with respect to the Ponzi Finding)

Expert No. 2: Shelly Cuff (with respect to the Liquidation Analysis)

As required by the Scheduling Order, on December 31, 2025, the Plan Proponents filed the *Plan Proponents' Notice of Expert Topics in Connection with Plan Confirmation* [Docket No. 3286], which designated Substantive Consolidation as a potential expert topic with respect to confirmation of the Plan. Because the *Amended Motion of the Official Committee of Unsecured Creditors for Substantive Consolidation of the Debtors and the KSMP Investment Entities and for Related Relief* [Docket No. 2943] (the "Substantive Consolidation Motion"), which seeks substantive consolidation of the Debtors and certain non-Debtors, will be heard prior to Plan confirmation, the Committee intends to submit the expert report of Kristin D. Rivera with respect to Substantive Consolidation in connection with the Substantive Consolidation Motion.

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[2] The Plan Proponents reserve all rights to designate rebuttal expert witnesses as appropriate.

[3]

Dated: January 30, 2026

KELLER BENVENUTTI KIM LLP

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