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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 **THE TILLMAN INVESTOR GROUP'S NOTICE OF IDENTIFICATION OF EXPERTS IN CONNECTION WITH PLAN CONFIRMATION**

[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 Joseph Knoll, individually (hereinafter referred to, collectively, as the "Tillman Investor Group").

[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.
/

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-defined Tillman Investor Group hereby identifies the following expert witness that it has requested submit an affirmative expert report in connection with its objection to the 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]

Austin Wade, CPA/ABV, CFE, Bachecki, Crom & Co., LLP (with respect to proposed Ponzi finding and the other topics identified by the Tillman Investor Group in its Identification of Expert Report Topics, served on or about December 31, 2025).

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[3] The Tillman Investor Group reserves all rights to designate rebuttal expert witnesses as appropriate.

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PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP

PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ, LLP

DATED: January 30, 2026

By: */s/* Isaac M. Gradman
Isaac M. Gradman
Michael E. Tracht
Alexander A. Wiegel

and

LAW OFFICE OF MICHAEL FALLON
Michael C. Fallon
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