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11 *Counsel to the Official Committee*
12 *of Unsecured Creditors*

13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SANTA ROSA DIVISION**

16 In re:
17 LEFEVER MATTSON,
18 a California corporation, *et al.*,
19 Debtors.

20 Case No. 24-10545 (CN)
21 (Jointly Administered)
22 Chapter 11

23 In re:
24 KS MATTSON PARTNERS, LP,
25 Debtor.

26 **THIRD STIPULATION TO EXTEND**
27 **WILMINGTON TRUST’S VOTING**
28 **DEADLINE AND DEADLINE TO**
OBJECT TO THE THIRD AMENDED
JOINT CHAPTER 11 PLAN OF
LIQUIDATION

29 The Official Committee of Unsecured Creditors appointed in the above-captioned chapter
30 11 cases (the “Committee”), LeFever Mattson, a California corporation, and its affiliated debtors
31 and debtors in possession (the “LFM Debtors”), KS Mattson Partners, LP (“KSMP” and together
32 with the LFM Debtor and the Committee, the “Plan Proponents”), and Wilmington Trust National
33 Association, as Trustee for the Benefit of the Registered Holders of JPMBB Commercial Mortgage
34 Securities Trust 2015-C30, Commercial Mortgage Pass-Through Certificates, Series 2015-C30
35 (“Wilmington Trust,” and together with the Plan Proponents, the “Parties”), hereby stipulate and
36 agree (“Stipulation”) as follows:
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1 1. On December 10, 2025, the Court entered its *Order (I) Approving the Plan*
2 *Summary and Approving Disclosure Statement; (II) Scheduling Status Conference on*
3 *Confirmation of Plan and Approving the Form and Manner of Service of the Confirmation Notice;*
4 *(III) Establishing Procedures for the Solicitation and Tabulation of Votes on Plan; (IV) Estimating*
5 *Investor Claims and Interests Solely for Voting Purposes; and (V) Approving Related Matters*
6 [Docket No. 3105] (the “Solicitation Procedures Order”).

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

12 3. The Parties have twice agreed in the past that the Objection Deadline and Voting
13 Deadline, only as to Wilmington Trust, would be extended. The Parties have agreed to further
14 extend the Objection Deadline and Voting Deadline to February 13, 2026 at 11:59 p.m. (Pacific
15 Time); *provided that*, should the Plan Proponents file a motion pursuant to Rule 9019 of the
16 Federal Rules of Bankruptcy Procedure seeking approval of a settlement agreement between the
17 Parties (the “9019 Motion”), then the Objection Deadline and Voting Deadline will be
18 automatically extended to seven calendar days after the Bankruptcy Court holds a hearing on the
19 9019 Motion. The Parties hereby agree to those revised deadlines.

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

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

24 6. This Stipulation shall be effective immediately upon entry of an order approving
25 this Stipulation.

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1 Dated: February 6, 2026

PACHULSKI STANG ZIEHL & JONES LLP

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By: /s/ John Fiero
John Fiero

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Counsel to the Committee

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6 Dated: February 6, 2026

KELLER BENVENUTTI KIM LLP

7

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

8

Counsel to the LFM Debtors

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10 Dated: February 6, 2026

HOGAN LOVELLS (US) LLP

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By: /s/ Edward McNeilly
Edward McNeilly

12

Counsel to KSMP

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14

15 Dated: February 6, 2026

McDERMOTT WILL & SHULTE

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By: /s/ Eric Seitz
Eric Seitz

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Counsel to Wilmington Trust

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