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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SANTA ROSA DIVISION

In re LEFEVER MATTSON, Consolidated Debtor,	Case No. 24-10545 HLB (Substantively Consolidated) Chapter 11 **OMNIBUS NOTICE OF MOTIONS TO ALLOW CONSENSUALLY RESOLVED INVESTOR CLAIMS SET FOR HEARING ON SEPTEMBER 3, 2026** **Hearing:** Date: September 3, 2026 Time: 10:00 a.m. Place: *Via Zoom or In Person* United States Bankruptcy Court 450 Golden Gate Ave, 16th Floor Courtroom 19 San Francisco, CA 94102 **Objection Deadline: August 20, 2026**

TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, THE AFFECTED CLAIMANTS, AND OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that on April 23, 2026, the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the "Bankruptcy Court") entered an order [Docket No. 4225] (the "Confirmation Order") confirming the *Third Amended Chapter 11 Plan of*

Liquidation, as Modified [Docket No. 4151] (the "Plan") in the chapter 11 case of the above-captioned debtor (the "Consolidated Debtor"). The effective date of the Plan occurred on May 14, 2026 (the "Effective Date"). *See* Docket No. 4335. Pursuant to the Plan, the LFM Plan Recovery Trustee has the authority and right to review, reconcile, compromise, settle, or object to asserted claims against and equity interests in the Consolidated Debtor. *See* Plan, § 5.3.6.

PLEASE TAKE FURTHER NOTICE that a hearing has been scheduled for **September 3, 2026 at 10:00 a.m.** (Pacific Time) (the "Hearing") before the Honorable Hannah L. Blumenstiel, United States Bankruptcy Judge, to consider the following motions to allow consensually resolved investor claims (collectively, the "Omnibus Motions"):[1]

Motion Title	Docket No.
First Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims	4475
Second Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims	4477
Third Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims	4479
Fourth Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims	4481
Fifth Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims	4483
Sixth Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims	4485
Seventh Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims	4487
Eighth Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims	4489

By way of each Omnibus Motion, the LFM Plan Recovery Trustee seeks the entry of an order resolving and allowing the investor claims listed in Schedule 1 to each Omnibus Motion in accordance with an executed *Investor Claim Settlement Offer Letter*, as further detailed in the Omnibus Motions and the applicable Schedule 1 attached to each Omnibus Motion.

PLEASE TAKE FURTHER NOTICE that the Hearing on the Omnibus Motions has been scheduled for **September 3, 2026, at 10:00 a.m. (Pacific Time)**, before the Honorable Hannah L. Blumenstiel, United States Bankruptcy Judge. Pursuant to the *Procedures for Noticing and Conducting Hearings in the San Francisco Division of the United States Bankruptcy Court for the Northern District of California (effective May 9, 2025)*, you may participate in this hearing in-person or by Zoom. To attend in-person, you should arrive at Courtroom 19, 450 Golden Gate Avenue, 16th Floor, San Francisco, CA no later than the time set forth in this notice. To attend via Zoom, please consult the Bankruptcy Court's website, which provides information explaining how to arrange an appearance at a video hearing. If you have questions about how to participate in a hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website.

[1] A capitalized term used but not defined herein shall have the meaning ascribed to it in the Omnibus Motions.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Bankruptcy Local Rules 9014-1(c) and 3007-1(c), any responses to the Omnibus Motions must be in writing and filed with the Bankruptcy Court and served on counsel for the LFM Plan Recovery Trustee at the above-referenced address no later than **11:59 p.m. (Pacific Time) on August 20, 2026**.

PLEASE TAKE FURTHER NOTICE that if factual disputes are presented by the Omnibus Motions and any timely response thereto, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. *See* Bankruptcy Local Rule 3007-1(b).

PLEASE TAKE FURTHER NOTICE that notice of the Omnibus Motions, in substantially the form attached hereto as Exhibit 1, has been sent to the parties whose claim(s) are subject to the Omnibus Motions.

PLEASE TAKE FURTHER NOTICE that copies of the Omnibus Motions are available (i) at no cost at the Consolidated Debtor's claim agent's website at https://veritaglobal.net/LM; (ii) on PACER for a fee, or (iii) by calling Verita at 1-877-709- 4751 (Toll Free).

Dated: July 28, 2026

PACHULSKI STANG ZIEHL & JONES LLP

By: */s/ Brooke E. Wilson*
Brooke E. Wilson

Counsel to the LFM Plan Recovery Trustee

Exhibit 1

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re: LEFEVER MATTSON, Consolidated Debtor.	Case No. 24-10545 HLB (Substantively Consolidated) Chapter 11 **NOTICE OF RESOLUTION OF INVESTOR CLAIM**

On July 28, 2026, Michael Goldberg, solely in his capacity as Plan Recovery Trustee of the LFM Plan Recovery Trust (the "Plan Recovery Trustee") formed pursuant to the *Third Amended Chapter 11 Plan of Liquidation, As Modified* [Docket No. 4151] (the "Plan") filed the *[•] Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims* (the "Omnibus Motion") with the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the "Bankruptcy Court"). A full copy of the Omnibus Motion may be obtained at no cost, as provided below.

By the Omnibus Motion, the Plan Recovery Trustee seeks to allow your Investor Claims in accordance with the Plan and your signed Investor Settlement Offer Letter. Accordingly, the Plan Recovery Trustee seeks to formally value and calculate your Investor Claim at the amounts listed on **Exhibit A**, attached hereto, and disallow all other Proof(s) of Claim or Proof(s) of Interest not identified as the Allowed Investor Claim.

Any Proof of Claim or Proof of Interest that the Bankruptcy Court disallows will be treated as if it had not been filed and you will not be entitled to any distribution on account thereof. However, you will be entitled to your pro rata portion of the Investor Tranche 1 Claim and Tranche 2 Claim of your Surviving Investor Claim as set forth on Exhibit A.

The Bankruptcy Court will hold a hearing on **September 3, 2026, at 10:00 a.m. (Pacific Time)** (the "Hearing"). You may participate in this hearing in-person or by Zoom. To attend in-person, you should arrive at Courtroom 19, 450 Golden Gate Avenue, 16th Floor, San Francisco, CA no later than the time set forth in this notice. To attend via Zoom, please consult the court's

website, which provides information explaining how to arrange an appearance at a video hearing. If you have questions about how to participate in a hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on the court's website.

If you **DO NOT** oppose the disallowance, liquidation, or reduction of your Proof(s) of Claim and/or Proof(s) of Interest listed above, then you do NOT need to file a written response to this Omnibus Motion and you do NOT need to appear at the Hearing.

If you **DO** oppose the disallowance, liquidation, or reduction of your Proof(s) of Claim and/or Proof(s) of Interest listed above, then you MUST file a response (a "Response"), in writing, with the Bankruptcy Court, and serve it on the counsel for the Plan Recovery Trustee at the above-referenced address so as to be received by no later than **11:59 p.m. (Pacific Time) on August 20, 2026**. Any oppositions or responses must be filed and served on counsel for the Plan Recovery Trustee. **The relief requested in the Omnibus Motion may be granted without a hearing if no opposition is timely filed and served.**

The Response must, at a minimum, include the following: (i) a caption setting forth the name of the Bankruptcy Court, the name of the Consolidated Debtor, the case number and title of the Omnibus Motion to which the Response is directed; (ii) your name, the assigned number(s) of your Proof(s) of Claim or Proof(s) of Interest, and an explanation for the amount of the Proof(s) of Claim or Proof(s) of Interest; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not grant the Omnibus Motion, including, without limitation, the specific factual and legal bases upon which you will reply in opposing the Omnibus Motion; (iv) a copy of any other documentation or other evidence of the Proof of Claim, to the extent not already included with the Proof of Claim, upon which you will rely in opposing the Omnibus Motion at the hearing; (v) a declaration under penalty of perjury of a person with personal knowledge of the relevant facts that support the Response; (vi) your name, address, telephone number, and/or the name, address, and telephone number of your attorney and/or designated representative to whom counsel for the Consolidated Debtor should serve a reply to the Response, if any; and (vii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on your behalf, if any. In lieu of listing their address and telephone number in their Response, an Investor may provide their contact information by emailing LMCommittee@pszjlaw.com.

If the Bankruptcy Court does not allow or disallow your Proof(s) of Claim and/or Proof(s) of Interest listed above, then the Plan Recovery Trustee will still have the right to object to your Proof(s) of Claim and/or Proof(s) of Interest on other grounds at a later date. You will receive a separate notice of any such objection.

Copies of the complete Omnibus Motion and other pleadings and documents identified herein can be viewed and/or obtained by: (i) free download from on the Consolidated Debtor's approved notice and claim agent's website at https://veritaglobal.net/LM; (ii) accessing the Bankruptcy Court's website at http://www.canb.uscourts.gov (PACER account required), (iii) by calling Verita at 1-877-709-4751 (Toll Free); or (iv) by emailing LMCommittee@pszjlaw.com.

Dated: July 28, 2026

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ *Brooke E. Wilson*
Debra I. Grassgreen
John D. Fiero
Jason H. Rosell
Brooke E. Wilson

Counsel to the LFM Plan Recovery Trustee

EXHIBIT A

Claimant Name(s):

Filed Investor Claim					Proposed Allowed Investor Claim				
Ref #	Claimant	Claim No. / Schedule No.	Entity	Total Asserted	Allowed Claim No.	Allowed Claim Claimant	Tranche 1 Amount	Tranche 2 Amount	Total Allowed Claim