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Attorneys for Michael I. Goldberg, as Trustee of the LFM Plan Recovery Trust

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 **STIPULATION EXTENDING CLOSE OF DISCOVERY SOLELY WITH RESPECT TO DEPOSITION OF CLAIMANT SIROOS SAIFI** Re: Dkt. Nos. 3081, 4187

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Michael I. Goldberg (the "Trustee"),[1] solely in his capacity as Trustee of the LFM Plan Recovery Trust, formed pursuant to the *Third Amended Chapter 11 Plan of Liquidation, as Modified* [Dkt. No. 4151] (the "Plan") in the above-captioned chapter 11 case (the "Chapter 11 Case") of consolidated debtor LeFever Mattson (the "Consolidated Debtor"),[2] on the one hand, and claimant Siroos Saifi ("Saifi," and together with the Trustee, the "Parties"), on the other hand, by and through their counsel of record in reference to and consideration of the following, hereby stipulate and agree as follows:

RECITALS

A. On December 9, 2025, the LFM Debtors objected [Dkt. No. 3081] (the "Objection") to Proof of Claim No. 68, which was filed by Saifi on October 28, 2024.

B. The filing of the Objection commenced a contested matter (the "Saifi Claim Contested Matter") under Rule 9014 of the Federal Rules of Bankruptcy Procedure.

C. On April 11, 2026, the Court entered the *Order Continuing Hearing on Objection to Claim No. 68 Filed by Siroos Saifi* [Dkt. No. 4187], which, among other things, set the deadline for the close of discovery in the Saifi Claim Contested Matter (the "Discovery Cutoff") as August 6, 2026.

D. On July 7, 2026, Trustee served the *Notice of Deposition of Claimant Siroos Saifi*, which expressed the Trustee's intention to depose Saifi (the "Saifi Deposition") on August 6, 2026.

E. On July 30, 2026, counsel for Saifi requested that the Saifi Deposition be rescheduled in light of counsel's unavailability on the scheduled date.

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[1] On May 14, 2026 (the "Effective Date"), the Plan, confirmed by the Court on April 23, 2026 [Dkt. No. 4225] (the "Confirmation Order"), became effective. *See* Dkt. No. 4335. As of the Effective Date, the Trustee retains all rights to institute, commence, file, pursue, prosecute, enforce, abandon, settle, compromise, release, waive, dismiss, or withdraw, as appropriate, any and all Causes of Action[.]" Confirmation Order, ¶ 13.

[2] On March 6, 2026, the Court entered the *Order Substantively Consolidating Debtors and KSMP Investment Entities and Granting Related Relief* [Dkt. No. 3914] (the "Substantive Consolidation Order"), which substantively consolidated the estates of LeFever Mattson, a California corporation and its affiliated debtors (the "LFM Debtors"), KS Mattson Partners, LP ("KSMP," and together with the LFM Debtors, the "Debtors") and three KSMP-affiliated entities (Perris Freeway Plaza, LP, Specialty Properties Partners, LP, and Treehouse Investments, LP), forming the "Consolidated Debtor."

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F. The Parties have agreed that the Saifi Deposition will be held on August 11, 2026.

A G R E E M E N T

NOW, THEREFORE, upon the foregoing Recitals, which are incorporated as though fully set forth herein, it is hereby stipulated and agreed, by and between the Parties, through the undersigned, and the Parties jointly request the Court to order that:

1. The Discovery Cutoff shall be extended to August 11, 2026 solely to permit the Saifi Deposition to go forward. The Trustee may seek a further extension of the Discovery Cutoff solely with respect to the Saifi Deposition.

2. The Discovery Cutoff remains August 6, 2026 for all other discovery in the Saifi Claim Contested Matter.

3. This Stipulation shall constitute the entire agreement and understanding of the Parties relating to the subject matter hereof and supersede all prior agreements and understandings relating to the subject matter hereof.

4. This Stipulation may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

5. The Court shall retain jurisdiction to resolve any and all disputes related to this Stipulation.

Dated: August 4, 2026

KELLER BENVENUTTI KIM LLP

By: */s/ Dara L. Silveira*
Dara L. Silveira

Attorneys for Michael I. Goldberg, as Trustee of the LFM Plan Recovery Trust

Dated: August 4, 2026

LAW OFFICES OF YASHA RAHIMZADEH

By: */s/ Yasha Rahimzadeh*
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