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Attorneys for Monley Hamlin, Inc.

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SANTA ROSA DIVISION

In re KS MATTSON PARTNERS, LP, Debtor.	Lead Case No. 24-10545-HLB (Substantively Consolidated) Chapter 11 Date: August 20, 2026 Time: 10:00 a.m. Place: United States Bankruptcy Court 450 Golden Gate Ave, Courtroom 19 San Francisco, CA 94102 Or, ZoomGov

MONLEY HAMLIN, INC.'s RESPONSE AND RESERVATION OF RIGHTS TO SOCOTRA CAPITAL INC'S MOTION FOR ORDER TO RELEASE FUNDS AND PAY LEGAL FEES AND EXPENSES UNDER COURT-APPROVED SETTLEMENT AGREEMENT

Monley Hamlin, Inc. ("MHI"), by and through its undersigned counsel, hereby files this response and reservation of rights to *Socotra Capital Inc's Motion For Order To Release Funds And Pay Legal Fees and Expenses Under Court-Approved Settlement Agreement* (the "Motion") [ECF Nos. 4464 and 4468] filed by Socotra Capital, Inc., on behalf of itself and any of its affiliates as lender and/or servicer (collectively, "Socotra") and in support thereof, states as follows:

1. The Motion incorrectly states that, the "Pinyon Properties" consisted of 38 separate parcels within the same development, only 12 of which were encumbered by Socotra's liens and the

remainder of which were unencumbered. In fact, MHI had caused claims of mechanics liens to be recorded against the following real properties located and known as Pinyon Creek II, Units 15/16, 17/18, 25/26, 27/28, 29/30, 31/32, and 33/34 (APN #s 107-170-015 through 034) in an unincorporated area of Placer County. *See* POC # 650; *see also* ECF Nos. 650-654; 754, 769, 854, and 859 (MHI's Relief from Stay Motion and Order); *see also* ECF Nos. 3967-3970 and 4195 (MHI Motion for Allowance of Administrative Claim and Order).

2. MHI subsequently entered into a settlement agreement (the "Settlement Agreement") with LeFever Mattson (the "Debtor"), which was approved by the Bankruptcy Court. ECF No. 3805. MHI was paid its settlement payment directly from the escrow for the sale of Pinyon Creek II as authorized by this Court. *See* ECF No. 3805.

3. By the Motion, Socotra requests an order directing the Debtor to pay the following amounts to Socotra (collectively, the "Funds"): (1) $157,798.78 of the cash collateral generated from the Pinyon Properties encumbered by Socotra's liens; and (2) Socotra's attorneys' fees and expenses incurred in connection with the Motion. The Motion further provides that Socotra understands that $315,597.55 in presale cash collateral/rent has been escrowed, and Socotra seeks distribution of $157,798.78, representing its asserted share of such cash collateral, together with Socotra's attorneys' fees and expenses incurred in connection with the Motion. Provided that the Funds requested by Socotra are to be distributed from the escrowed presale cash collateral/rent and do not include amounts previously disbursed to MHI pursuant to the Settlement Agreement, MHI takes no position with respect to the relief requested in the Motion. MHI expressly reserves all rights, claims, defenses, and remedies with respect to any contrary position or any future request for relief that may affect MHI or amounts previously disbursed to MHI.

Dated: August 6, 2026

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

By: */s/ Thomas A. Willoughby*
Thomas A. Willoughby
Attorneys for Monley Hamlin, Inc.

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UNITED STATES BANKRUPTCY COURT

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SANTA ROSA DIVISION

In re KS MATTSON PARTNERS, LP, Debtor.	Lead Case No. 24-10545-HLB (Substantively Consolidated) Chapter 11 Date: August 20, 2026 Time: 10:00 a.m. Place: United States Bankruptcy Court 450 Golden Gate Ave, Courtroom 19 San Francisco, CA 94102 Or, ZoomGov

PROOF OF SERVICE

I, Allison S Kieser, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 500 Capitol Mall, Suite 2250, Sacramento, CA 95814.

On August 6, 2026, I caused to be served the following documents via Electronic Mail upon the service list attached hereto as **Exhibit A**; and via First Class Mail upon the service list attached hereto as **Exhibit B**:

1. MONLEY HAMLIN, INC.'s RESPONSE AND RESERVATION OF RIGHTS TO SOCOTRA CAPITAL INC'S MOTION FOR ORDER TO RELEASE FUNDS AND PAY LEGAL FEES AND EXPENSES UNDER COURT-APPROVED SETTLEMENT AGREEMENT

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same

day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 6, 2026, at Sacramento, California.

/s/ Allison S Kieser
Allison S Kieser

Exhibit A
Core/2002 Service List
Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email
Interested Party	David Renaud	David and Kim Renaud	76renaud@gmail.com
Counsel to AmTrust North America, Inc.on behalf of Wesco Insurance	Maurice Wutscher LLP	Alan C. Hochheiser	ahochheiser@mauricewutscher.com
Counsel to Winside USA, Inc.	Covington & Burling LLP	Abigail V. O'Brient	aobrient@cov.com
Counsel to Federal Home Loan Mortgage Corporation	Federal Home Loan Mort. Corp.	Ashley Beane	ashley_beane@freddiemac.com
Counsel to Secured Creditors Visio International, Inc. and Y. Tito Sasaki and Janet L. Sasaki Trust	Law Office of Benjamin R. Levinson	A Professional Corporation	ben@benlevinsonlaw.com
Interested Party	Brooke Sample		brookesample10@gmail.com
Counsel to the Debtors and Debtors in Possession	DSI Consulting	Bradley D. Sharp	bsharp@dsiconsulting.com
Counsel to Creditor Duggan's Mission Chapel, Amanda Henry, as Trustee of the Fran Bragg Revocable Trust & Umpqua Bank, Columbia Bank, & Virginia Ghilarducci	Jeffer Mangels & Mitchell LLP	Bennett G. Young, Robert B. Kaplan, Thomas M. Geher	byoung@jeffer.com; rkaplan@jeffer.com; tgeher@jeffer.com
Committee of Unsecured Creditors	Hayes 2004 Family Trust	Bryan & Patricia Hayes	byronehaze1@yahoo.com
Counsel to Unlisted Creditor Graham Reid	Stephen T. Cammack Law Offices	Stephen T. Cammack	cammacklawoffice@gmail.com
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Committee of Unsecured Creditors	Charles Edgar		cedgars@comcast.net
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Interested Party	Carla Strickfaden		cjstrickfaden@gmail.com
Counsel for Bank of America, N.A.	Tiffany & Bosco	Chad L. Butler	clb@tblaw.com
Counsel to Wilmington Trust, National Association, as Trustee for the benefit of the Registered Holders of JPMBB Commercial Mortgage Pass-Through Certificates, Series 2015-C30	McDermott Will & Schulte LLP	Charles R. Gibbs, Eric C. Seitz	crgibbs@mwe.com; eseitz@mwe.com
Counsel to Matt Treger	Spencer Fane LLP	Catherine Schlomann Robertson	Crobertson@spencerfane.com
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Counsel to Creditor, California-American Water Company	Hahn & Hahn LLP	Dean G. Rallis Jr.	drallis@hahnlawyers.com
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Interested Party	Jillian Fitzgerald		gojillianfitz@gmail.com
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Committee of Unsecured Creditors	Umbriac & Tubley Family Trust	Mae Umbriac & Andrew Tubley	ridell@dpf-law.com
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Interested Party	Sara Ganyo		sjganyo@gmail.com
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Secured Lender	Leland McAbee , Teresa McAbee		terimcabee@aol.com; lelandmcabee1@gmail.com
Counsel to Creditors Michael Goodman, Diana Goodman, Julian L. Delgado and Gloria E. Rezentes Delgado	Hefner, Stark & Marois, LLP	Thomas P. Griffin, Jr.	tgriffin@hsmlaw.com
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Counsel to Monley Hamlin Inc.	Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP	Thomas A. Willoughby, Mikayla E. Kutsuris	twilloughby@ffwplaw.com; mkutsuris@ffwplaw.com
Interested Party	Darryl Hayes		Twinpop@gmail.com
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Committee of Unsecured Creditors & Interested Party	Walter Schenk		walter.schenk@comcast.net
Counsel to Denise Ebbett, Successor Trustee of the Fisher Family Trust and as Attorney-in Fact for Virginia Fisher	Law Office of Wayne A. Silver	Wayne A. Silver	ws@waynesilverlaw.com
Interested Party	Wynne & Ben Coughtry		wynneandben@gmail.com

Exhibit B
Core/2002 Service List
Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Secured Lender	Bank of America		PO Box 660861		Dallas	TX	75266-0861
Creditor Bank of America, N.A.	Bank of America N.A.		PO Box 31785		Tampa	FL	33631-3785
Secured Lender	Butcher Road Partners LLC		6359 Auburn Blvd.	Suite B	Citrus Heights	CA	95621
Office of the California Attorney General	California Attorney General	Bankruptcy Department	1300 I St., Ste. 1740		Sacramento	CA	95814-2919
Secured Lender	California Bank of Commerce		2999 Oak Rd Ste 210		Walnut Creek	CA	94597-2052
Secured Lender	CHASE BANK		P.O. Box 650528		Dallas	TX	75265-0528
Secured Lender	Citizens Business Bank		PO Box 3938		Ontario	CA	91761
Secured Lender	Comerica		PO Box 641618		Detroit	MI	46264-1618
Secured Lender	Duggans Memorial Chapel	Law Offices of Gregory E. Stubbs	747 Appleton Way		Sonoma	CA	95476-7247
Secured Lender	Exchange Bank		1420 Rocky Ridge Dr Ste 190		Roseville	CA	95661
Counsel to Creditor Fidelity National Title Insurance Company	Fidelity National Title Insurance Company	Jonathan Gass	2533 N 117th Avenue		Omaha	NE	68164
Secured Lender	Frank Bragg Revocable Trust	Mandy Mary Henry	2261 Taylor Mountain Pl		Santa Rosa	CA	95404
Secured Lender	Frank Bragg Revocable Trust	Maxine Bragg	931 Maxwell St		Healdsburg	CA	95448
Secured Lender	Frank Bragg Revocable Trust	Nancy Bragg	1708 St. Anthony Way		Santa Rosa	CA	95404
Secured Lender	Greystone Servicing Corporation, Inc		PO Box 281163		Atlanta	GA	30384-1163
IRS	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346		Philadelphia	PA	19101-7346
IRS	Internal Revenue Service	Centralized Insolvency Operation	2970 Market St		Philadelphia	PA	19104
Debtors	LeFever Mattson		6359 Auburn Blvd., Suite B		Citrus Heights	CA	95621
Secured Lender	Leland McAbee		525 Burr Oak Court		Vacaville	CA	95688
Counsel to Deutsche Bank Trust Company Americas	McCalla Raymer Leibert Pierce, LLP	Bankruptcy Department	1544 Old Alabama Road		Roswell	GA	30076
Secured Lender	Michael & Ana Cavanaugh		625 Holly Dr		Sebring	FL	33876
Secured Lender	Mr Cooper		PO Box 60516		City of Industry	CA	91716-0516
Secured Lender	Napa Elm, LP		6359 Auburn Blvd, Ste B		Citrus Heights	CA	95621
Secured Lender	Needleman/Hayes Family Trust		1250 Ferrelo Rd		Santa Barbara	CA	93103
Secured Lender	NexBank		2515 McKinney Ave Ste 1100		Dallas	TX	75201
Secured Lender	PHH Mortgage Services		PO Box 5452		Mount Laurel	NJ	08054
Secured Lender	Poppy Bank		438 First St		Santa Rosa	CA	95401
Secured Lender	Ronald Hodges		771 Oak Ln		Sonoma	CA	95476
Secured Lender	Select Portfolio Servicing, Inc.		PO Box 65450		Salt Lake City	UT	84165-0450
Secured Lender	Serene Investments LLC		2625 Alcatraz Ave., Suite 513		Berkely	CA	94705
Secured Lender	Shellpoint Mortgage Servicing		PO Box 650840		Dallas	TX	75265-0840
Secured Lender	Socotra Capital		2208 29th Street	Ste 100	Sacramento	CA	95817
Secured Lender	Tri Counties Bank		PO Box 909		Chico	CA	95927
Secured Lender	Umpqua Bank		PO Box 1580		Roseburg	OR	97470-0367
Secured Lender	Virginia Ghilarducci Trustee		19130 Ola Court		Sonoma	CA	95476
Secured Lender	Wells Fargo Home Mortgage	Attn: Credit Bureau Disputes	Home Mortgage	PO Box 10335	Des Moines	IA	50306
Secured Lender	Wells Fargo Wholesale Lockbox		PO Box 60253		Charlotte	NC	28260-0253
Secured Lender	Y. Tito Sasaki, Trustee & Janet L. Sasaki, Trustee & Visio International, Inc.		PO BOX 200		VINEBURG	CA	95487