KELLER BENVENUTTI KIM LLP
TOBIAS S. KELLER (Cal. Bar No. 151445)
(tkeller@kbkllp.com)
DAVID A. TAYLOR (Cal. Bar No. 247433)
(dtaylor@kbkllp.com)
DARA L. SILVEIRA (Cal. Bar No. 274923)
(dsilveira@kbkllp.com)
THOMAS B. RUPP (Cal. Bar No. 278041)
(trupp@kbkllp.com)
101 Montgomery Street, Suite 1950
San Francisco, California 94104
Telephone: (415) 496-6723
Facsimile: (650) 636-9251

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

NOTICE OF HEARING ON MOTION FOR (I) RECONSIDERATION OF THE ORDER REGARDING DISCOVERY DISPUTE [DKT. NO. 4559] AND (II) ENTRY OF AN ORDER SETTING A STATUS CONFERENCE ON THE SAIFI CLAIM

Response Deadline: October 1, 2026

Date: October 8, 2026
Time: 10:00 a.m. (Pacific Time)
Place: **In-Person or Zoom Appearances**
United States Bankruptcy Court
450 Golden Gate Avenue
16th Floor, Courtroom 19
San Francisco, CA 94102

KELLER BENVENUTTI KIM LLP
101 MONTGOMERY STREET, SUITE 1950
SAN FRANCISCO, CALIFORNIA 94104

TO (A) THE OFFICE OF THE UNITED STATES TRUSTEE; (B) THE AFFECTED CLAIMANTS; AND (C) OTHER PARTIES ENTITLED TO NOTICE:

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 [Dkt. No. 4225] (the "Confirmation Order") confirming the *Third Amended Chapter 11 Plan of Liquidation, as Modified* [Dkt. No. 4151] (the "Plan")[1] 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* Dkt. No. 4335. On the Effective Date, the Plan Recovery Trustee was substituted for the Consolidated Debtor with respect to the Omnibus Objection (as defined below). Confirmation Order, ¶ 14. The Confirmation Order authorizes the Plan Recovery Trustee to "continue, prosecute, or otherwise resolve such actions in accordance with the Plan and Plan Recovery Trustee Agreement." *Id.*

PLEASE TAKE FURTHER NOTICE that on September 15, 2026, the Consolidated Debtor filed the *Motion for (I) Reconsideration of the Order Regarding Discovery Dispute [Dkt. No. 4559] and (II) Entry of an Order Setting a Status Conference on the Saifi Claim* [Dkt. No. 4568] (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion has been scheduled for **October 8, 2026, at 10:00 a.m. (Pacific Time)** (the "Hearing"), 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.

PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Local Rules 9014-1(c) and 3007-1(c) and the docket text order entered by the Court on May 26, 2026, any responses to the Omnibus Objection must be in writing and filed with the Bankruptcy Court and served on counsel for the Plan Recovery Trustee at the above-referenced address no later than **11:59 p.m. (Pacific Time) on October 1, 2026**. No response shall exceed 10 pages absent prior leave of court, and this page limit shall not apply to any declaration(s) or request(s) for judicial notice that might be filed in support of a response to the Omnibus Objection.

PLEASE TAKE FURTHER NOTICE that if factual disputes are presented by the Omnibus Objection 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).

[1] Capitalized terms used but not otherwise herein defined have the meanings ascribed to them in the Plan.

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SAN FRANCISCO, CALIFORNIA 94104

PLEASE TAKE FURTHER NOTICE THAT copies of the 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), or (iii) by calling Verita at 1-877-709-4751 (Toll Free).

Dated: September 15, 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

KELLER BENVENUTTI KIM LLP
101 MONTGOMERY STREET, SUITE 1950
SAN FRANCISCO, CALIFORNIA 94104

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