Debra I. Grassgreen (CA Bar No. 169978)
John D. Fiero (CA Bar No. 136557)
Jason H. Rosell (CA Bar No. 269126)
PACHULSKI STANG ZIEHL & JONES LLP
One Sansome Street, Suite 3430
San Francisco, California 94104-4436
Telephone: 415-263-7000
Email: dgrassgreen@pszjlaw.com
jfiero@pszjlaw.com
jrosell@pszjlaw.com

Counsel to Michael Goldberg, 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 (CN) (Substantively Consolidated) Chapter 11 **STIPULATION BETWEEN THE LFM PLAN RECOVERY TRUST AND JS HELD, AS SUCCESSOR IN INTEREST TO STAPLETON GROUP CONCERNING KSMP CLAIMS 111 AND 580**

Michael Goldberg, in his capacity as Plan Recovery Trustee of the LFM Plan Recovery Trust (the "***Trustee***") formed pursuant to the *Third Amended Chapter 11 Plan of Liquidation, as Modified* [Docket No. 4151] in the above-captioned chapter 11 case (the "***Chapter 11 Case***"), and JS Held, as successor in interest to Stapleton Group ("***Stapleton***" and together with the Trustee, the "***Parties***"), hereby enter into this stipulation on the terms set forth below ("***Stipulation***") to address proofs of claim number 111 ("***Claim 111***") and 580 ("***Claim 580***") originally filed in the KS Mattson Partners case as detailed below.

RECITALS

A. On September 12, 2024, LeFever Mattson, a California corporation ("***LFM***" or "***Consolidated Debtor***"), and 57 of its affiliates (collectively with LFM, the "***LFM Debtors***") filed

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voluntary petitions for relief under chapter 11 of Title 11 of the United States Code in the United States Bankruptcy Court for the Northern District of California (the "***Court***").[1]

B. On November 22, 2024, KS Mattson Partners, LP ("***KSMP***") became subject to an involuntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2025, the Court entered the *Stipulated Order for Relief in an Involuntary Case* and appointed Robbin L. Itkin as the Responsible Individual in the KSMP bankruptcy case, with effect from June 16, 2025.

C. Stapleton was employed by KSMP and filed Claim 111 and, later, Claim 580 in KSMP's bankruptcy case. Each claim seeks payment of $226,172.43 as a priority claim alleged to be due under 11 U.S.C. Section 507(a)(3).

D. On March 6, 2026, the Court entered its *Order Substantively Consolidating Debtors and KSMP Investment Entities and Granting Related Relief* [Docket No. 3914], which substantively consolidated the estates of the LFM Debtors, KSMP, and three KSMP-affiliated entities.

E. On April 23, 2026, the 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***"), which became effective on May 14, 2026. Pursuant to the Plan and Confirmation Order, the Trustee is appointed as successor-in-interest to, and representative of, the Consolidated Debtor's estate for the reconciliation, compromise, and settlement of all Claims and Equity Interests (each as defined in the Plan).

F. JS Held is the legal successor in interest to Stapleton Group, with full right, title and interest in Claim 111 and Claim 580.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, THE PARTIES STIPULATE AS FOLLOWS:

1. Effective Date. This Stipulation shall be effective upon entry of an order approving this Stipulation (the "***Effective Date***").

2. Allowance of Claim 111 as modified; Disallowance of Claim 580. Upon the

[1] Windscape Apartments, LLC, filed its chapter 11 petition in the Court on August 6, 2024. Pinewood Condominiums, LP and Ponderosa Pines, LP filed their chapter 11 petitions on October 2, 2024.

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SAN FRANCISCO, CALIFORNIA

Effective Date, Claim 111 shall be deemed allowed as an administrative priority claim under 11 U.S.C. Section 507(a)(3) in the modified amount of $180,937.94. Claim 580 shall be disallowed in its entirety, as it duplicates Claim 111.

3. Authority. Each person who executes this Stipulation by or on behalf of each respective Party warrants and represents that he or she is duly authorized and empowered to execute and deliver this Stipulation on behalf of such Party.

4. Binding Effect. This Stipulation shall be binding upon and inure to the benefit of the Parties and their respective heirs, executors, administrators, successors, and permitted assigns.

5. Authority. The Trustee is authorized to take all actions necessary to effectuate the relief granted in this Stipulation.

6. Retention of Jurisdiction. The Court shall retain jurisdiction to resolve any and all disputes related to this Stipulation. Each Party irrevocably consents for all purposes of this Stipulation to the jurisdiction of the Court and agrees that venue is proper in the Court.

IN WITNESS WHEREOF, and in agreement herewith, the Parties have executed and delivered this Stipulation as of the date last set forth below.

Dated: September 24, 2026

PACHULSKI STANG ZIEHL & JONES LLP

By: */s/ John D. Fiero*
Debra I. Grassgreen
John D. Fiero
Jason H. Rosell

Counsel to Michael Goldberg, Trustee of the LFM Plan Recovery Trust

JS HELD, AS SUCCESSOR IN INTEREST TO STAPLETON GROUP

By: */s/ Michael Bergthold*
Michael Bergthold

Authorized Representative

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA