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Counsel to Michael Goldberg, solely in his capacity 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.[1]	Case No. 24-10545 (HLB) (Substantively Consolidated) Chapter 11 **DECLARATION OF GAIL S. GREENWOOD IN SUPPORT OF MOTION OF THE PLAN RECOVERY TRUSTEE FOR ENTRY OF AN ORDER ENFORCING THE PLAN INJUNCTION PROVISIONS AND DIRECTING (1) DISMISSAL OF STATE COURT ACTION, AND (2) WITHDRAWAL OF LIS PENDENS**

I, Gail S. Greenwood, declare under penalty of perjury as follows:

1. I am an attorney at the law firm of Pachulski Stang Ziehl & Jones LLP, counsel to Michael Goldberg, in his capacity as Plan Recovery Trustee ("Plan Recovery Trustee") under the

[1] On March 6, 2026, the Bankruptcy Court entered an *Order Substantively Consolidating Consolidated Debtor and KSMP Investment Entities and Granting Related Relief* [Docket No. 3914], which substantively consolidated the estates of LeFever Mattson, a California corporation and its affiliated debtors (the "LFM Debtors"), KS Mattson Partners, LP ("KSMP"), and three-KSMP affiliated entities (Perris Freeway Plaza, LP, Specialty Properties Partners, LP and Treehouse Investments, LP) (the "KSMP Investment Entities"). A list of the consolidated entities is attached to the order.

Third Amended Chapter 11 Plan of Liquidation, as Modified (the "Plan," Bankr. Docket No. 4151). I submit this declaration in support of the Plan Recovery Trustee's accompanying *Motion for Entry of an Order Enforcing the Plan Injunction Provisions and Directing (1) Dismissal of State Court Action, and (2) Withdrawal of Lis Pendens* ("Motion"),[2] filed herewith.

2. Attached as **Exhibit A** is a copy of the online docket of the Borden Action, available publicly from the Sacramento Superior Court as case number 26-CV-019064.

3. Attached as **Exhibit B** is a true and correct copy of the Plan Recovery Trustee's letter dated August 21, 2026 to Bolden advising that the Bolden Action is a violation of the Plan provisions and requesting that the plaintiffs voluntarily dismiss the lawsuit to avoid further litigation.

4. Attached as **Exhibit C** is a copy of the Notice of Stay of Proceedings filed by the Plan Recovery Trustee on August 21, 2026 in the Bolden Action.

5. Attached as **Exhibit D** is a copy of the email dated August 26, 2026 and Complaint that I received from Ericka Cooper.

6. Upon receipt of the email and Complaint on August 26, 2026, I responded to Ericka Cooper (lan65le@gmail.com) and Jacob Bolden (jacobabolden@gmail.com) and advised that my firm is not authorized to accept service of the Complaint on behalf of any of the named defendants.

7. Attached as **Exhibit E** is a copy of the Stay Response dated August 27, 2026 that I retrieved from online court records of the Bolden Action.

8. Attached as **Exhibit F** is a copy of the Lis Pendens Order entered on September 22, 2026 that I retrieved from online court records of the Bolden Action.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on October 6, 2026 in San Francisco, California.

By: /s/ Gail S. Greenwood

[2] Capitalized terms have the meanings ascribed in the Motion.

EXHIBIT A

26CV019064, BOLDEN, et al. vs MELICK, et al.

CA Superior - Sacramento

Sacramento

This case was retrieved on 10/01/2026

Header

Case Number: 26CV019064
Date Filed: 08/04/2026
Date Full Case Retrieved: 10/01/2026
Status: Unknown
Misc: (61) Wrongful Eviction Case; Unlimited Civil

Details

Judge: HON. Richard C. Miadich
Next Event: 06/08/2027 Initial Case Management Conference
Location: Sakauye Courth...</span / DEPT 8C
Case Type: Unlimited Civil

Participants

Litigants	Attorneys
amarra mott **Plaintiff**	
Jacob Bolden **Plaintiff**	
Does 1 to 50 **Defendant**	
Home tax service of America **Defendant**	
kristina melick **Defendant**	

Other Docket Proceedings

Date	Details
09/30/2026	Hearing on Ex Parte Application application for TRO and restoration OF 5703 orange ave scheduled for 10/01/2026 at 01:30 PM in Tani G. Cantil-Sakauye Courthouse at Department 8C Not Held - Vacated by Court on 09/30/2026 Category: Event
09/22/2026	Hearing on Ex Parte Application "Ex parte application for TRO restoring possession of 5703 Orange Ave and OSC re preliminary injunction scheduled for 09/23/2026 at 09:00 AM in Tani G. Cantil-Sakauye Courthouse at Department 8C Not Held - Vacated by Court on 09/22/2026 Category: Event
09/22/2026	Proposed Order Filed By: amarra mott (Plaintiff) As To: kristina melick (Defendant); Home tax service of America (Defendant) Category: Document

Date	Details
09/22/2026	Updated -- GRANTED Order: Category: Document Exact Name:GRANTED Order |
09/22/2026	Proof of Service service on corporation thru business address of agent Filed By: Jacob Bolden (Plaintiff) As To: Home tax service of America (Defendant); Does 1 to 50 (Defendant) Category: Document
08/27/2026	Objection "Response and Objection to Notice of Stay CM-180 ??? request for determination no stay established Filed By: Jacob Bolden (Plaintiff) Category: Document
08/27/2026	Exhibit List Filed By: Jacob Bolden (Plaintiff) Category: Document
08/27/2026	Declaration Jacob Boldens declaration in support of objection Filed By: Jacob Bolden (Plaintiff) Category: Document
08/27/2026	Proof of Service by Mail Filed By: Jacob Bolden (Plaintiff) As To: kristina melick (Defendant); Home tax service of America (Defendant); Does 1 to 50 (Defendant) Category: Document
08/27/2026	of plf Amarra Mott for Court Approval to Record Notice Pendency of Action (Lis Pendens) Filed By: amarra mott (Plaintiff) As To: kristina melick (Defendant); Home tax service of America (Defendant) Category: Document
08/27/2026	Re: Application to Record Notice of Pendency of Action Filed By: amarra mott (Plaintiff) As To: kristina melick (Defendant); Home tax service of America (Defendant) Category: Document
08/27/2026	Exhibit A Filed By: amarra mott (Plaintiff) As To: kristina melick (Defendant); Home tax service of America (Defendant) Category: Document
08/27/2026	Declaration of Amarra Mott ISO Application to Record Notice of Pendency of Action Filed By: amarra mott (Plaintiff) Category: Document
08/27/2026	Updated -- Application of plf Amarra Mott for Court Approval to Record Notice Pendency of Action (Lis Pendens): Exact Name changed from of plf Amarra Mott for Court Approval to Record Notice Pendency of Action (Lis Pendens) to Application of plf Amarra Mott for Court Approval to Record Notice Pendency of Action (Lis Pendens) Category: Document
08/24/2026	Summons on Complaint Filed By: Jacob Bolden (Plaintiff); amarra mott (Plaintiff) As To: kristina melick (Defendant); Home tax service of America (Defendant); Does 1 to 50 (Defendant) Category: Document
08/21/2026	Notice of Stay of Proceedings Filed By: Home tax service of America (Defendant)

Date	Details
	As To: Home tax service of America (Defendant)
	Category: Document
08/21/2026	Proof of Service by Mail Filed By: Home tax service of America (Defendant)
	As To: Jacob Bolden (Plaintiff); amarra mott (Plaintiff)
	Category: Document
08/21/2026	Amended Complaint Filed By: Jacob Bolden (Plaintiff); amarra mott (Plaintiff)
	As To: kristina melick (Defendant); Home tax service of America (Defendant); Does 1 to 50 (Defendant)
	Category: Document
08/21/2026	Updated -- Amended Complaint (1st): Category: Document
	Name Extension:(1st) |
08/10/2026	Case assigned to Hon. Richard C. Miadich in Department 8C Tani G. Cantil-Sakauye Courthouse Category: Assignment
08/10/2026	Notice of Case Assignment and Case Management Conference Filed By: Clerk
	Category: Document
08/10/2026	Order on Court Fee Waiver (Superior Court) Filed By: Clerk
	As To: Jacob Bolden (Plaintiff)
	Category: Document
08/10/2026	Order on Court Fee Waiver (Superior Court) Filed By: Clerk
	As To: amarra mott (Plaintiff)
	Category: Document
08/10/2026	Initial Case Management Conference scheduled for 06/08/2027 at 01:30 PM in Tani G. Cantil-Sakauye Courthouse at Department 8C Category: Event
08/10/2026	Updated -- Order on Court Fee Waiver (Superior Court): Status Date changed from 08/10/2026 to 08/10/2026 Category: Document
08/10/2026	Updated -- Order on Court Fee Waiver (Superior Court): Status Date changed from 08/10/2026 to 08/10/2026 Category: Document
08/04/2026	Complaint Filed By: Jacob Bolden (Plaintiff); amarra mott (Plaintiff)
	As To: kristina melick (Defendant); Home tax service of America (Defendant)
	Category: Document
08/04/2026	Civil Case Cover Sheet Filed By: Jacob Bolden (Plaintiff); amarra mott (Plaintiff)
	As To: kristina melick (Defendant); Home tax service of America (Defendant)
	Category: Document
08/04/2026	Request to Waive Court Fees Filed By: Jacob Bolden (Plaintiff)
	Category: Document

Date	Details
08/04/2026	Request to Waive Court Fees Filed By: amarra mott (Plaintiff) Category: Document
08/04/2026	Request to Waive Court Fees
08/04/2026	Request to Waive Court Fees

Proceedings

Date	#	Proceeding Text	Details
09/22/2026	23	Proof of Service service on corporation thru business address of agent	PageCount: 3
09/22/2026	22	GRANTED Order	PageCount: 3
08/27/2026	21	Declaration of Amarra Mott ISO Application to Record Notice of Pendency of Action	PageCount: 4
08/27/2026	20	Exhibit A	PageCount: 14
08/27/2026	19	Re: Application to Record Notice of Pendency of Action	PageCount: 1
08/27/2026	18	Notice of Lis Pendens	PageCount: 3
08/27/2026	17	Application of plf Amarra Mott for Court Approval to Record Notice Pendency of Action (Lis Pendens)	PageCount: 6
08/27/2026	16	Proof of Service by Mail	PageCount: 3
08/27/2026	15	Declaration Jacob Boldens declaration in support of objection	PageCount: 2
08/27/2026	14	Exhibit List	PageCount: 36
08/27/2026	13	Proposed Order	PageCount: 1
08/27/2026	12	Objection "Response and Objection to Notice of Stay CM-180 — request for determination no stay established	PageCount: 6
08/24/2026	11	Summons on Complaint	PageCount: 1
08/21/2026	10	Amended Complaint (1st)	PageCount: 114
08/21/2026	9	Proof of Service by Mail	PageCount: 3
08/21/2026	8	Notice of Stay of Proceedings	PageCount: 21
08/10/2026	7	Order on Court Fee Waiver (Superior Court)	PageCount: 4
08/10/2026	6	Order on Court Fee Waiver (Superior Court)	PageCount: 4

Date	#	Proceeding Text	Details
08/10/2026	5	Notice of Case Assignment and Case Management Conference	PageCount: 2
08/04/2026	2	Civil Case Cover Sheet	PageCount: 2
08/04/2026	1	Complaint	PageCount: 9

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End of Document

EXHIBIT B

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August 21, 2026

Via U.S. Mail & Email
Mr. Jacob Bolden
6128 Elder Creek Road
Sacramento, CA 95824

jacobabolden@gmail.com

Via U.S. Mail
Ms. Amarra Mott
6128 Elder Creek Road
Sacramento, CA 95824

Re: ***Bolden and Mott v. Home Tax Service of America, Inc., et al.*, Sacramento Superior Court, Case No. 26-cv-019064 (the "Sacramento Case")**

Dear Mr. Bolden and Ms. Mott:

This office represents the Plan Recovery Trustee, Michael Goldberg, in his capacity as Plan Recovery Trustee of the Plan Recovery Trust formed pursuant to the *Third Amended Chapter 11 Plan of Liquidation, As Modified* for the estate of LeFever Mattson, a California corporation (the "Consolidated Debtor")[1] that is the subject of a pending bankruptcy case in the United States Bankruptcy Court for the Northern District of California (Case No. 24-10545-HLB) (the "Bankruptcy Case"). The Consolidated Debtor includes Home Tax Service of America, Inc. ("Home Tax").

I am writing to inform you that you have violated a court order in the Bankruptcy Case by filing the above-referenced Sacramento Case against Home Tax. We ask that you immediately dismiss the Sacramento Case to avoid further litigation and potential sanctions.

On April 23, 2026, the Bankruptcy Court entered an order confirming the *Third Amended Chapter 11 Plan of Liquidation, as*

[1] On March 6, 2026, the Court entered an *Order Substantively Consolidating Consolidated Debtor and KSMP Investment Entities and Granting Related Relief* [Docket No. 3914] (the "Substantive Consolidation Order"). *See* https://www.veritaglobal.net/lm/document/591054526030600000000009. A complete list of the entities that comprise the Consolidated Debtor is attached to the Substantive Consolidation Order.

Modified [Docket No. 4151] (the "Plan")[2] for the Consolidated Debtor. The Plan became effective on May 14, 2026. Under the Plan, all assets and liabilities of the Consolidated Debtor are combined in the Plan Recovery Trust for distributions to creditors holding allowed claims that arose prior to the Bankruptcy Case. For that reason, creditors of the Consolidated Debtor (including Home Tax) were required to file proofs of claim in the Bankruptcy Case.

Of particular significance, Section 11.3 of the Plan exculpates Home Tax from all claims and lawsuits in connection with or arising from the Bankruptcy Case. Further, Section 11.4 of the Plan permanently enjoins all persons or entities from prosecuting any claims or lawsuits against Home Tax that are in any way related to the Bankruptcy Case; and prior to bringing any claims or lawsuits against Home Tax, the person must first seek a determination from the Bankruptcy Court to determine if its claims are excluded from the exculpation provisions. Paragraph 22 of the Confirmation Order confirms these injunctions.

In the Sacramento Case, you allege claims arising from an unlawful detainer action by Home Tax during the Bankruptcy Case in October 2025. Those claims are in violation of the Confirmation Order and Plan because Home Tax has been released from liability and the claims are barred.

As a preliminary matter, this law firm is not authorized to accept service of your complaint in the Sacramento Case. We also do not represent Ms. Melick, the other named defendant in the Sacramento Case.

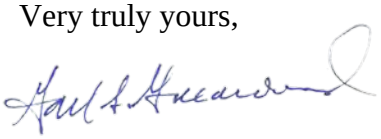
Unless you voluntarily dismiss your Sacramento Case against Home Tax **by September 10, 2026**, the Plan Recovery Trustee will make a motion to the Bankruptcy Court to enforce the exculpation and injunction clauses of the Plan and will seek

[2] *See Order Confirming Third Amended Chapter 11 Plan as Modified* [Docket No. 4225] (the "Confirmation Order") https://www.veritaglobal.net/lm/document/591054526042300000000001; and Plan [Docket No. 4151] https://www.veritaglobal.net/lm/document/591054526040700000000004.

Case: 24-10545 Doc# 4588 Filed: 10/06/26 Entered: 10/06/26 17:58:55 Page 11 of 162

monetary sanctions against both of you for your violation. The Plan Recovery Trustee reserves all other rights.

Very truly yours,



Gail S. Greenwood

bcc: J. Fiero
J. Rosell
S. Golden
B. Wilson
G. Brown
P. Jeffries
N. Hall
Pamela Jackson - jackson@pcjlawinc.com
Brenda Comfort - bcomfort@lefma.com
David Taylor – dtaylor@kbkllp.com
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Case: 24-10545 Doc# 4588 Filed: 10/06/26 Entered: 10/06/26 17:58:55 Page 13 of 162

EXHIBIT C

ATTORNEY OR PARTY WITHOUT ATTORNEY *(Name, State Bar number, and address):*
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San Francisco, California 94104-4436
TELEPHONE NO.: 415-263-7000 FAX NO. *(Optional):*
E-MAIL ADDRESS *(Optional):* ggreenwood@pszjlaw.com
ATTORNEY FOR *(Name):* Consolidated Debtor

FOR *COURT USE ONLY*

ELECTRONICALLY FILED
Superior Court of California
County of Sacramento
08/21/2026
By: B. Prasad Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SACRAMENTO
STREET ADDRESS: 500 G Street
MAILING ADDRESS:
CITY AND ZIP CODE: Sacramento, CA 95814
BRANCH NAME: Tani G. Cantil-Sakauye CourthouseTani G. Cantil-Sakauye

PLAINTIFF/PETITIONER: JACOB BOLDEN and AMARRA MOTT

DEFENDANT/RESPONDENT: HOME TAX SERVICE OF AMERICA, INC. dba LEFEVER MATTSON PROPERTY MANAGEMENT; KRISTINA MELICK a/k/a KRISTINA FOX; and DOES 1 through 50, inclusive

NOTICE OF STAY OF PROCEEDINGS

CASE NUMBER: 26CV019064

JUDGE: Hon. Richard C. Miadich
DEPT.: 8C

To the court and to all parties:

1. Declarant *(name):* Gail S. Greenwood
   a. ☐ is ☐ the party ☒ the attorney for the party who requested or caused the stay.
   b. ☐ is ☐ the plaintiff or petitioner ☐ the attorney for the plaintiff or petitioner. The party who requested the stay has not appeared in this case or is not subject to the jurisdiction of this court.
2. This case is stayed as follows:
   a. ☐ With regard to all parties.
   b. ☒ With regard to the following parties *(specify by name and party designation):* Home Tax Service of America, Inc. dba LeFever Mattson Property Management aka Consolidated Debtor
3. Reason for the stay:
   a. ☐ Automatic stay caused by a filing in another court. *(Attach a copy of the Notice of Commencement of Case, the bankruptcy petition, or other document showing that the stay is in effect, and showing the court, case number, debtor, and petitioners.)*
   b. ☐ Order of a federal court or of a higher California court. *(Attach a copy of the court order.)*
   c. ☐ Contractual arbitration under Code of Civil Procedure section 1281.4. *(Attach a copy of the order directing arbitration.)*
   d. ☐ Arbitration of attorney fees and costs under Business and Professions Code section 6201. *(Attach a copy of the client's request for arbitration showing filing and service.)*
   e. ☒ Other: exculpation clause at para. 22 of Order Confirming Third Amended Chapter 11 Plan (attached)

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

Date: August 21, 2026

Gail S. Greenwood
(TYPE OR PRINT NAME OF DECLARANT)

(SIGNATURE)

Form Adopted for Mandatory Use
Judicial Council of California
CM-180 [Rev. January 1, 2007]

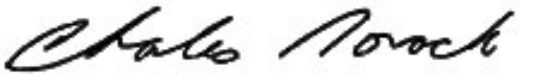
Cal. Rules of Court, rule 3.650
www.courtinfo.ca.gov

Entered on Docket
EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
Docket #4225 Date Filed: 04/23/2026

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Counsel to LeFever Mattson, the Consolidated Debtor

The following constitutes the order of the Court.
Signed: April 23, 2026



Charles Novack
U.S. Bankruptcy Judge

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Erin N. Brady (CA Bar No. 215038)
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Counsel to the Official Committee of Unsecured Creditors

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

ORDER CONFIRMING THIRD AMENDED CHAPTER 11 PLAN, AS MODIFIED, OF CONSOLIDATED DEBTOR LEFEVER MATTSON

Confirmation Hearing:

Date: April 14, 2026
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
1300 Clay Street, Courtroom 215
Oakland, CA 94612
Judge: Honorable Charles Novack

On April 14, 2026, the Bankruptcy Court held a hearing (the "Confirmation Hearing") on confirmation of the *Third Amended Chapter 11 Plan of Liquidation, As Modified* [Docket No. 4151] (as amended or modified, the "Plan") by plan proponents (the "Plan Proponents") LeFever Mattson ("LFM" or the "Consolidated Debtor") and the Official Committee of Unsecured Creditors (the "Committee") appointed in the above-captioned chapter 11 case (the "Chapter 11 Case"). The Consolidated Debtor, prior to the Substantive Consolidation Order (defined herein), was the legally separate Debtors and KSMP Investment Entities.

The Bankruptcy Court, having considered the Plan, all declarations, pleadings, and evidence submitted in support of the Plan; all other relevant facts, pleadings, and evidence of record in the Chapter 11 Case; and the arguments of counsel at the Confirmation Hearing, issued findings of fact and conclusions of law on the record at the Confirmation Hearing, which constitute the Bankruptcy Court's findings of fact and conclusions of law for the purposes of Federal Rule of Bankruptcy Procedure 7052, as made applicable to this contested matter by Federal Rule of Bankruptcy Procedure 9014, and which findings of fact and conclusions of law are incorporated herein by this reference. To the extent that any of the following findings of fact constitute conclusions of law, they are adopted as such. To the extent that any of the following conclusions of law constitute findings of fact, they are adopted as such. A capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Plan.

For the reasons stated by the Bankruptcy Court on the record at the Confirmation Hearing, and for good cause appearing therefor,

IT HAS BEEN DETERMINED BY THE COURT THAT:

A. Jurisdiction and Venue. The Bankruptcy Court has jurisdiction to confirm the Plan pursuant to 28 U.S.C. §§ 1334 and 157. The Confirmation Hearing is a core proceeding under 28 U.S.C. § 157(b)(2)(L) and venue of the Chapter 11 Case in the Northern District of California is proper under 28 U.S.C. § 1408.

B. Chapter 11 Petitions. On August 6, 2024, Debtor Windscape Apartments, LLC filed a voluntary chapter 11 petition. On September 12, 2024, 58 affiliated LFM Debtors, including LFM, filed voluntary chapter 11 petitions. On October 2, 2024, Debtors Pinewood

Condominiums, LP and Ponderosa Pines, LP filed voluntary chapter 11 petitions. On November 22, 2024, an involuntary chapter 11 petition was filed against KSMP. On June 9, 2025, an order for relief was entered against KSMP [Case No. 24-10715, Docket No. 131]. The Consolidated Debtor and the Debtors are proper debtors under section 109 of the Bankruptcy Code and the Plan Proponents are proper proponents of the Plan under section 1121(a) of the Bankruptcy Code. The Consolidated Debtor continues to operate its business and manage its property as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this Chapter 11 Case.

C. Substantive Consolidation. On March 6, 2026, the Bankruptcy Court entered its *Order Substantively Consolidating Debtor Lefever Mattson and KS Mattson Partners, LP and Granting Related Relief* [Docket No. 3914] (the "Substantive Consolidation Order"). Pursuant to the Substantive Consolidation Order, the Debtors and the KSMP Investment Entities and their estates were substantively consolidated for all purposes (including for purposes of distribution under a plan) into the single Consolidated Debtor.

D. Plan Supplement. The Plan Supplement complies with the terms of the Plan, and the filing and notice of the Plan Supplement were appropriate and complied with the requirements of the Solicitation Procedures Order, the Bankruptcy Code, and the Bankruptcy Rules, and no other or further notice is or shall be required. The Consolidated Debtor is authorized to modify the Plan Supplement documents following entry of this Confirmation Order in a manner consistent with the Plan, this Confirmation Order, or applicable law.

E. Notice of Confirmation Hearing. Due and sufficient notice of the Confirmation Hearing has been provided under the circumstances and under applicable rules and consistent with the requirements imposed by the Bankruptcy Court in its *Order (I) Approving the Plan Summary and Approving Disclosure Statement; (II) Scheduling Status Conference on Confirmation of Plan and Approving the Form and Manner of Service of the Confirmation Notice; (III) Establishing Procedures for the Solicitation and Tabulation of Votes on Plan; (IV) Estimating Investor Claims and Interests Solely For Voting Purposes; and (V) Approving Related Matters* [Docket No. 3105] entered on December 10, 2025 (the "Solicitation Procedures Order").

F. Voting on Plan. The Solicitation Procedures Order fixed January 21, 2026, at 11:59 p.m. (Pacific Time) as the deadline to submit ballots to accept or reject the Plan. The Plan Proponents have tabulated the ballots received, as evidenced by the declaration of Andres A. Estrada filed on April 7, 2026 [Docket No. 4162] (the "Voting Declaration") and the Tabulation Results attached as Exhibit A thereto (the "Tabulation Results"). As set forth in the Voting Declaration, all classes entitled to vote on the Plan – Class 3 (Secured Lender Claims), Class 4 (Trade Claims), and Class 5 (Investor Claims) – voted to accept the Plan in accordance with section 1126 of the Bankruptcy Code. The procedures by which the ballots for acceptance or rejection of the Plan and for making related elections were distributed and tabulated were fair, properly conducted, and complied with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, applicable non-bankruptcy law, and the Solicitation Procedures Order.

G. Bankruptcy Rule 3016. In accordance with Bankruptcy Rule 3016(a), the Plan is dated and identifies the Consolidated Debtor and the Committee as the plan proponents. The filing of the Disclosure Statement with the clerk of the Bankruptcy Court satisfied Bankruptcy Rule 3016(b). The Plan and Disclosure Statement describe in specific and conspicuous language all acts and actions to be enjoined and identify the Persons and Entities that would be subject to injunctions. Bankruptcy Rule 3016(c) is therefore satisfied.

H. Modifications to the Plan Approved. After service of the Solicitation Packages pursuant to the Solicitation Procedures Order, the Debtors made certain modifications to the Plan. All modifications to the Plan since the entry of the Solicitation Procedures Order as reflected in the Plan (the "Plan Modifications") are consistent with the provisions of the Bankruptcy Code, including sections 1122, 1123, 1125, and 1127, are incorporated by reference herein and are approved. None of the Plan Modifications materially and adversely affect the treatment of any holder of a Claim or Equity Interest under the Plan. Accordingly, pursuant to section 1127(a) of the Bankruptcy Code and Bankruptcy Rule 3019, none of the modifications require additional disclosure under section 1125 of the Bankruptcy Code or re-solicitation of votes under section 1126 of the Bankruptcy Code. The Plan as modified shall constitute the Plan submitted for Confirmation.

I. Objections. Objections to the Plan were filed by Deutsche Bank Trust Company Americas as Trustee [Docket No. 3386], the Tillman Investor Group [Docket No. 3409], Duggan's Mission Chapel, Inc. and Amanda Henry as Trustee [Docket No. 3412], the Bank of New York Mellon as Trustee [Docket No. 3419], Nationstar Mortgage LLC [Docket No. 3420], and JPMorgan Chase Bank, N.A. [Docket No. 3421] (collectively, the "Objections"). The Objections have been either withdrawn, overruled, or otherwise consensually resolved by the parties and, if applicable, any related modifications to the Plan are reflected in the Plan.

J. Compliance with Confirmation Requirements of Bankruptcy Code. The Plan, as modified by this Order (the "Confirmation Order"), complies with the applicable requirements of sections 1123 and 1129 of the Bankruptcy Code, which set forth the conditions necessary for confirmation. In particular, the Plan is fair and equitable pursuant to section 1129(b) of the Bankruptcy Code.

K. Settlement of Claims and Controversies. Pursuant to sections 1123(a)(5), 1123(b)(3), and 1123(b)(6) of the Bankruptcy Code, as well as Bankruptcy Rule 9019, and in consideration for the Distributions and other benefits provided under the Plan, the provisions of the Plan constitute a good faith compromise and settlement of all claims and controversies relating to the rights that a Holder of a Claim or an Equity Interest may have against the Consolidated Debtor with respect to any Claim, Equity Interest, or any Distribution on account thereof, as well as of all Causes of Action against the Consolidated Debtor. The compromise and settlement of all such claims or controversies are (i) in the best interest of the Consolidated Debtor, the Debtors, the Estates, and their respective property and stakeholders; and (ii) fair, equitable, and reasonable.

L. Ponzi Findings and Conclusions. As evidenced by the Joint Investigation Report [Docket No. 2568] and other evidence proffered by the Plan Proponents prior to or at the Confirmation Hearing, the Debtors and the KSMP Investment Entities were operated as a Ponzi scheme from at least September 12, 2017. During this period, Kenneth W. Mattson ("Mattson") controlled the Debtors and the KSMP Investment Entities as a single enterprise – disregarding their separate corporate forms – and caused them to engage in fraudulent activities and transactions (collectively, the "Mattson Transactions"). The Mattson Transactions took many

forms, including the sale of fictitious interests in many of the Debtors and the KSMP Investment Entities; the transfer of vast sums of money between and among LFM, KSMP, other Debtors, and the KSMP Investment Entities; and the transfer among the Debtors of properties encumbered with high-interest loans often not disclosed to the affected investors in those properties. The Mattson Transactions amounted to a Ponzi scheme – a form of investment fraud characterized by the perpetrator's payment of old investors with money invested by new ones. Mattson effected this Ponzi scheme, in large part, through a bank account (the "1059 Account") that he controlled and that he maintained separately from LFM's accounting system. From September 2017 until his removal as an officer of LFM, Mattson induced Investors to deposit over $104 million into the 1059 Account. Rather than allocate those funds to the specific Debtors and the KSMP Investment Entities in which the Investors believed they were investing, Mattson commingled the 1059 Account funds and used them in improper ways, including by making over $70 million in payments to Investors. Mattson's misuse of the 1059 Account and similar misuse of KSMP's 1380 Account (as defined in the Joint Investigation Report) further supports the Ponzi findings herein.

On May 13, 2025, Mattson was indicted in the case captioned *United States of America v. Kenneth W. Mattson*, Case No. CR25-00126-CRB (N.D. Cal.) (the "Indictment"). Among other things, the Indictment alleges that Mattson ran a Ponzi scheme.

Based upon the record of the Confirmation Hearing, all the proceedings held before this Bankruptcy Court in this Chapter 11 Case, and the foregoing findings of fact and conclusions of law,

IT IS HEREBY ORDERED THAT:

A. Confirmation of the Plan

1. The Plan and each of its provisions (whether or not specifically approved herein) is hereby **APPROVED** and **CONFIRMED** in all respects, as modified herein; *provided, however*, that if there is any direct conflict between the terms of the Plan and the terms of this Confirmation Order, the terms of this Confirmation Order shall control. All objections and responses to, and statements regarding, the Plan, to the extent that they have not been withdrawn, waived, or settled

prior to the entry of this Confirmation Order or are not cured by the relief granted herein, are hereby expressly overruled.

2. The Plan Modifications are approved pursuant to sections 1122, 1123, 1125, and 1127 of the Bankruptcy Code, and pursuant to section 1127(a) of the Bankruptcy Code and Bankruptcy Rule 3019, none of the Plan Modifications require additional disclosure under section 1125 of the Bankruptcy Code or re-solicitation of votes under section 1126 of the Bankruptcy Code.

3. Notwithstanding anything to the contrary contained in this Confirmation Order or the Plan, Allowed Class 2 Claims shall be reinstated and the Consolidated Debtor's obligations shall be unaffected by the Chapter 11 Case, leaving unaltered the legal, equitable, and contractual rights to which such Claim entitles the Holder.

B. Conditions Precedent

4. The Effective Date shall not occur, and the Plan shall not be consummated unless, and until each of the conditions set forth in Section 9.1 of the Plan have been satisfied or duly waived pursuant to Section 9.2 of the Plan.

5. Notwithstanding Bankruptcy Rules 3020(e), 6004(h), 7062, or 9014 to the extent applicable, this Confirmation Order is not subject to any stay, and the Plan shall become effective at the option of the Plan Proponents at any time in their sole discretion following (i) entry of this Confirmation Order and (ii) satisfaction of the requirements set forth in the preceding paragraph 3 of this Confirmation Order.

C. Successors and Assigns

6. The terms of this Confirmation Order are binding on the Consolidated Debtor, the Debtors, any and all Holders of Claims and Equity Interests (irrespective of whether such Claims or Equity Interests are impaired under the Plan or whether the Holders of such Claims or Equity Interests accepted, rejected, or are deemed to have accepted or rejected, the Plan), any and all non-debtor parties to executory contracts and unexpired leases with the Consolidated Debtor and the Debtors and any and all entities who are parties to or are subject to the settlements, compromises,

releases, discharges, and injunctions set forth in the Plan and the respective heirs, executors, administrators, successors or assigns, if any, of any of the foregoing.

D. Vesting of Assets

7. As provided in Section 5.3.3 of the Plan, on the Effective Date, the Plan Recovery Trust Assets shall automatically vest in the Plan Recovery Trust.

8. Retained Real Property. Upon the Effective Date, and as provided in Section 5.3.3 of the Plan, legal title to any Real Property and any associated personal property not sold, transferred, or disposed of by the Consolidated Debtor prior to the Effective Date shall remain with the Consolidated Estate, and such legal title shall not be transferred to any other entity, including the Plan Recovery Trust, but such Real Property shall continue to be marketed for sale pursuant to the Plan. Upon the consummation of the sale of the applicable Retained Real Property, the resulting Real Property Sale Proceeds will automatically and immediately vest in the Plan Recovery Trust, to be administered and distributed by the Plan Recovery Trustee in accordance with the Plan and the Plan Recovery Trust Agreement.

9. Non-Debtor Subsidiaries. Upon the Effective Date, and as provided in Section 5.3.3 of the Plan, any ownership interests in non-debtor Entities not sold, transferred, or disposed of by the Consolidated Debtor prior to the Effective Date shall remain property of the Consolidated Estate, and shall not vest in any other entity, including the Plan Recovery Trust, and instead such ownership interests shall expressly remain property of the Consolidated Estate and shall be administered by the Consolidated Debtor. Notwithstanding the foregoing, any economic interest of the Consolidated Debtor in a non-debtor Entity shall vest in the Plan Recovery Trust upon the Effective Date.

E. Executory Contracts and Unexpired Leases

10. On and as of the Effective Date, and as provided in Section 6.1 of the Plan, the Consolidated Debtor (and any applicable Debtor) shall assume all executory contracts and unexpired leases that are listed on the Schedule of Assumed Agreements (including as amended by the *Notice of Amended Exhibits to Supplement to Third Amended Joint Plan of Liquidation* [Docket No. 4163]) and shall assign such contracts and leases to the Consolidated Estate or its

designee. The Plan Proponents reserve the right to amend the Schedule of Assumed Agreements at any time prior to the Effective Date (i) to delete any executory contract or unexpired lease and provide for its rejection under the Plan or otherwise, or (ii) to add any executory contract or unexpired lease and provide for its assumption and assignment under the Plan. Prior to or on the Effective Date, the Plan Proponents will serve notice of any amendment(s) to the Schedule of Assumed Agreements to the party or parties to those agreements affected by such amendment (the "Counterparties"). Any Counterparties with an objection (an "Assumption Objection") to the assumption, assumption and assignment, rejection, and/or other disposition of the Counterparty's agreement and the proposed cure amount (if applicable) must file with the Bankruptcy Court and serve on counsel to the Plan Proponents or the Plan Recovery Trustee (as applicable) such Assumption Objection within fourteen (14) calendar days after the Effective Date. In the event that the parties cannot reach a consensual resolution of the Assumption Objection, a hearing (to be scheduled) will be held on the matter by the Bankruptcy Court.

11. On and as of the Effective Date, and as provided in Section 6.2 of the Plan, all executory contracts and unexpired leases of the Consolidated Debtor (and any applicable Debtor) shall be rejected except for (i) executory contracts and unexpired leases that have been previously assumed or rejected by the Debtors, (ii) all executory contracts and unexpired leases specified as to be assumed in Section 6.1 of the Plan (including all contracts and leases set forth in the Schedule of Assumed Agreements, as may be amended), and (iii) any agreement, obligation, security interest, transaction, or similar undertaking that the Consolidated Debtor believes is not executory or a lease, but that is later determined by the Bankruptcy Court to be an executory contract or unexpired lease that is subject to assumption or rejection under section 365 of the Bankruptcy Code. Executory contracts and unexpired leases that have been previously assumed, or assumed and assigned, pursuant to an order of the Bankruptcy Court, shall not be affected by the Plan.

12. Any Rejection Claim or other Claim for damages arising from the rejection under the Plan of an executory contract or unexpired lease must be Filed and served no later than the Rejection Claims Bar Date. Any such Rejection Claim that is not timely Filed and served will be

forever disallowed, barred, and unenforceable, and the Holder of such Claim will not receive, and be barred from receiving, any Distributions on account of such untimely Claim. The Plan Recovery Trustee may object to any Rejection Claim by the Claim Objection Deadline. The Rejection Claims Bar Date established by the Plan does not alter any rejection claims bar date established by an order of the Bankruptcy Court with respect to any executory contract or unexpired lease that was previously rejected in the Chapter 11 Case.

F. Preservation of Causes of Action

13. Except as otherwise provided in the Plan or herein, from and after the Effective Date, the Plan Recovery Trust will retain all rights to institute, commence, file, pursue, prosecute, enforce, abandon, settle, compromise, release, waive, dismiss, or withdraw, as appropriate, any and all of the Causes of Action, including Avoidance Actions and Causes of Action that are Contributed Claims (whether existing as of the Petition Date or thereafter arising), in each case in any court or other tribunal, including in an adversary proceeding Filed in the Chapter 11 Case, subject to the requirements set forth in the Plan and the Plan Recovery Trust Agreement. The Plan Recovery Trust shall have the exclusive right, power, and interest on behalf of itself, the Consolidated Debtor, the Debtors, the Estates, the KSMP Investment Entities, and the Contributing Claimants to enforce, sue on, settle, compromise, transfer, or assign (or decline to do any of the foregoing) any or all of the Plan Recovery Trust Actions without notice to or approval from the Bankruptcy Court, subject to the Plan Recovery Trust Agreement. In accordance with the Plan, and pursuant to section 363 of the Bankruptcy Code and Bankruptcy Rule 9019, without any further notice to or action, order, or approval of the Bankruptcy Court, from and after the Effective Date, the Plan Recovery Trust may compromise and settle Plan Recovery Trust Actions, subject to the Plan Recovery Trust Agreement. The Consolidated Debtor, the Debtors, the Estates, the KSMP Investment Entities, and the Plan Recovery Trustee shall be entitled to the tolling and extension of time periods provided under section 108 of the Bankruptcy Code for any and all Causes of Action retained under the Plan.

14. Upon the Effective Date, the Plan Recovery Trustee shall be automatically substituted for the Debtors, the Consolidated Debtor, the Estates, and the KSMP Investment

Entities, as the real party in interest in any and all pending actions or proceedings, including any pending claim objections in the Chapter 11 Case, without the need for further notice to or order of the Bankruptcy Court. All such substitutions shall be deemed effective by operation of the Plan, and the Plan Recovery Trustee shall have the authority to continue, prosecute, or otherwise resolve such actions in accordance with the Plan and the Plan Recovery Trust Agreement.

15. The failure to specifically identify in the Disclosure Statement (including the exhibits and schedules thereto) or the Plan any potential or existing Avoidance Action or Cause of Action as a Plan Recovery Trust Action is not intended to and shall not limit the rights of the Plan Recovery Trust to pursue any such Avoidance Action or Cause of Action. Unless a Plan Recovery Trust Action is expressly waived, relinquished, released, compromised, or settled in the Plan or any Final Order (including the Confirmation Order), the Consolidated Debtor and Debtors expressly reserve such Plan Recovery Trust Action for later resolution by the Plan Recovery Trustee (including any Avoidance Action or Cause of Action not specifically identified or of which the Consolidated Debtor and Debtors may presently be unaware or that may arise or exist by reason of additional facts or circumstances unknown to the Consolidated Debtor and Debtors at this time or facts or circumstances that may change or be different from those the Consolidated Debtor and Debtors now believe to exist). As such, no preclusion doctrine, including the doctrines of *res judicata*, collateral estoppel, issue preclusion, claim preclusion, waiver, estoppel (judicial, equitable, or otherwise), or laches will apply to any such Avoidance Action or Cause of Action upon or after Confirmation of the Plan based on the Disclosure Statement, the Plan, or this Confirmation Order, except when such Avoidance Action or Cause of Action has been expressly released. In addition, the right to pursue or adopt any claims alleged in any lawsuit in which any Debtor or the Plan Recovery Trust is a plaintiff, defendant, or interested party is fully reserved as against any Person or Entity, including the plaintiffs or co-defendants in such lawsuits.

16. Freddie Mac and California Bank of Commerce Resolution. Notwithstanding any other provision of this Confirmation Order or the Plan, any finding of fact or conclusion of law by this Bankruptcy Court, or any appellate court, in connection with the confirmation of the Plan relating to any Ponzi Finding (as defined in the Plan Summary) shall have no preclusive effect on

either Federal Home Loan Mortgage Corporation ("Freddie Mac") or California Bank of Commerce ("CBC") in any litigation or proceeding by or against Freddie Mac or CBC in any tribunal. Neither the Consolidated Debtor, the Committee, nor the Plan Recovery Trustee (or any estate representative or other successor) may seek to enforce any such findings against Freddie Mac or CBC or contend that Freddie Mac or CBC are bound by any such findings. Any and all rights and defenses of Freddie Mac and CBC to defend the claims and causes of action against them are preserved, including the right to contest whether their respective borrower-Debtor participated in any alleged Ponzi scheme.

17. Timothy J. LeFever and LeFever-Related Parties Resolution. Notwithstanding anything to the contrary contained in this Confirmation Order, any findings of fact or conclusions of law contained in this Confirmation Order, or the Plan, relating to any Ponzi findings or conclusions or similar findings and conclusions shall not be binding on Timothy J. LeFever or any other LeFever-Related Party (as defined in that certain *Settlement Agreement With Mutual General Releases* dated as of January 29, 2026 at Docket No. 3876 (the "LeFever Settlement Agreement")), in connection with any third party litigation or proceedings of any nature, and shall not have any collateral estoppel, issue preclusion, res judicata, or similar effect as to Timothy J. LeFever or any other LeFever-Related Party in connection with any third party litigation or proceedings of any nature.

18. Notwithstanding any other provision in the Plan or this Confirmation Order, the Plan Recovery Trust, Plan Recovery Trustee, and any subsequent chapter 7 trustee who may be appointed in this bankruptcy case shall be bound by the terms of the LeFever Settlement Agreement and the *Order Approving Entry Into and Performance Under the Settlement Agreement With Timothy J. LeFever and Certain of His Affiliates* [Docket No. 3876].

G. Actions in Furtherance of the Plan

19. The Plan Proponents and the Plan Recovery Trustee are authorized to: (a) take any and all such actions as may be necessary or appropriate to implement, effectuate, and consummate the Plan in accordance with its terms, subject to this Confirmation Order; and (b) execute any and all such documents and instruments as may be required to effectuate the Plan.

H. Releases

20. Any releases contained in the Plan, including, without limitation, Sections 11.2 and 11.3 of the Plan, are approved in all respects. The commencement or prosecution by any entity, whether directly, derivatively or otherwise, of any claims, obligations, suits, judgments, damages, demands, debts, rights, causes of action, or liabilities released pursuant to the Plan are permanently enjoined.

I. Non-Discharge of the Debtors; Property Free and Clear

21. In accordance with section 1141(d)(3)(A) of the Bankruptcy Code, the Plan does not discharge the Consolidated Debtor and Debtors. Section 1141(c) of the Bankruptcy Code nevertheless provides, among other things, that the property dealt with by the Plan, including, without limitation, the Retained Real Properties, is free and clear of all claims and interests of creditors, equity security holders, and of general partners in the Debtors. As of the Effective Date, all Entities are precluded and barred from asserting against any property to be distributed under the Plan any Claims, rights, Causes of Action, liabilities, Equity Interests, or other action or remedy based on any act, omission, transaction, or other activity that occurred before the Effective Date, except as expressly provided in the Plan, this Confirmation Order, or any Orders approving settlement agreements entered in the Chapter 11 Case.

J. Injunctions

22. As of the Effective Date, all Persons and Entities are permanently enjoined from: commencing or prosecuting, whether directly, derivatively, or otherwise, any Claims, obligations, suits, judgments, damages, demands, debts, rights, Causes of Action, losses, or liabilities released or exculpated pursuant to the Plan. Prior to commencing an action against an Exculpated Party in any way related to or connected with the Chapter 11 Case, any Person or Entity must first seek a determination that the claims asserted in such action are excluded from the exculpation provisions in the Plan and permission from the Bankruptcy Court to prosecute such action. The Bankruptcy Court shall retain exclusive jurisdiction to determine the scope and effect of any release or exculpation provided in the Plan.

23. Unless otherwise provided in the Plan, all injunctions or stays in the Chapter 11 Case under sections 105 or 362 of the Bankruptcy Code or otherwise, and extant as of the Confirmation Hearing (excluding any injunctions or stays contained in or arising from the Plan or the Confirmation Order), shall remain in full force and effect through the Effective Date.

K. Prior Settlement Agreements

24. Nothing in this Confirmation Order modifies the terms of any Orders approving settlement agreements previously entered in the Chapter 11 Case.

L. Sales of Retained Real Property

25. The Consolidated Estate may continue to sell Retained Real Property, including any Retained Real Property for which a sale contract has been entered into but such sale has not closed as of the Effective Date (each, a "Pending Sale" governed by a "Pending Sale Contract"). Any order or notice required by the (i) *Order Establishing Omnibus Procedures for Real Property Sales* [Docket No. 971], (ii) *Order Establishing Omnibus Procedures for Real Property Sales (Socotra Collateral)* [Docket No. 1381], or (iii) *Order Granting Motion of Debtor KSMP to Establish Procedures for Real Property Sales* [Docket No. 2694] shall not be required to close a Pending Sale or any other sale of Retained Real Property on or after the Effective Date.

26. If an order approving the sale of a Retained Real Property is entered by this Bankruptcy Court prior to the Effective Date but such sale provided for therein has not closed prior to the Effective Date (a "Pending Sale Order"), the closing deadline of such sale shall remain as stated in the Pending Sale Contract. For a Pending Sale where no Pending Sale Order was entered prior to the Effective Date, the following closing periods shall apply:

a. The closing deadline for a Pending Sale where contingencies have been waived by the parties to the Pending Sale Contract prior to the Effective Date shall be the later of (i) fourteen (14) calendar days from the Effective Date or (ii) the closing deadline stated in the Pending Sale Contract. The closing deadline may be extended by agreement of the parties to the Pending Sale Contract.

b. The closing deadline for a Pending Sale where contingencies have not been waived by the parties to the Pending Sale Contract prior to the Effective Date shall be the later of (i) fourteen (14) calendar days from the date on the which contingencies are waived or (ii) the closing deadline stated in the Pending Sale Contract. The closing deadline may be extended by agreement of the parties to the Pending Sale Contract.

27. Socotra Retained Property Sale Procedures. With respect to each Retained Property (as defined in the Settlement Agreement at Docket No. 2852-1) (the "Socotra Settlement Agreement") that has not been sold prior to the Effective Date: (i) the Consolidated Debtor shall, prior to entering into a sale contract with a proposed purchaser of each Retained Property, provide to Socotra Capital, Inc. ("Socotra") (a) a summary of the proposed purchase offer and (b) a reasonable opportunity to submit a competing offer and otherwise participate in the sale process as a potential purchaser, and (ii) no sale of a Retained Property shall close, absent a further order of the Bankruptcy Court after three (3) business days' notice to Socotra and a hearing, unless Socotra has approved in writing (via email) the purchase price and closing statement.

28. This Confirmation Order shall be deemed to amend, with no further action, the Pending Sale Contracts to comply with the provisions found herein. Further, any changes to a Pending Sale Contract caused by this Confirmation Order shall not constitute a breach of such contract.

29. Notwithstanding anything to the contrary in the Bankruptcy Code, Bankruptcy Rules, this Confirmation Order, the Plan, or the Plan Recovery Trust Agreement, the Consolidated Estate and the Plan Recovery Trustee shall retain the right, after the Effective Date, to obtain relief under section 363(h) of the Bankruptcy Code as may be necessary or appropriate in connection with the liquidation of the Retained Real Properties.

M. Insurance Policies

30. Notwithstanding anything to the contrary contained in this Confirmation Order, the Plan, or the Plan Recovery Trust Agreement, the Plan shall not discharge, impair, or otherwise modify any obligations of the non-Debtor parties to all insurance policies of any kind, whether

current or historical, issued at any time to or for the benefit of the Consolidated Debtor, the Debtors, or the KSMP Investment Entities, including but not limited to director and officer liability policies, casualty insurance, property insurance, malpractice insurance, errors and omissions insurance, and any similar or related insurance policies, together with all rights, claims, and proceeds arising therefrom ("Insurance Polices"), owed to the Consolidated Debtor, Debtors, the KSMP Investment Entities, or any other Estate Parties or any other parties including any additional insureds. Nothing herein and in the Plan shall cause the rejection, breach, or termination of any Insurance Policies. For the avoidance of doubt, the Estate Parties reserve all of their rights, claims, offsets, setoffs, defenses, counterclaims, and all other interests relating to any and all Insurance Policies.

31. To the extent one or more of the Insurance Policies provide potential coverage related to one or more Causes of Action the Estate Parties hold or may hold against any Person or Entity, the Consolidated Debtor shall, to the extent permissible, assign all rights thereunder with respect to such Causes of Action to the Plan Recovery Trustee. All net proceeds of Insurance Policies received by the Plan Recovery Trustee shall be treated as proceeds of such Causes of Action for all purposes under the Plan. Nothing in this Confirmation Order or in the Plan shall diminish or impair the enforceability by the Estate Parties of the Insurance Policies and related agreements that may cover claims and causes of action against the Consolidated Debtor, any other Estate Parties, or any other Entity.

N. Section 1146(a) Exemption

32. To the fullest extent permitted by section 1146(a) of the Bankruptcy Code, any and all transfers (whether from a Debtor or Estate to the Plan Recovery Trust, the Consolidated Debtor, another Debtor, a non-Debtor affiliate, or any other Person or Entity) of any property under or pursuant to the Plan or pursuant to (a) the issuance, distribution, transfer, or exchange of any debt, equity security, or other interest in or of the Debtors, the Consolidated Debtor, or the Plan Recovery Trust; (b) the creation, modification, consolidation, termination, refinancing, and/or recording of any mortgage, deed of trust, or other security interest, or the securing of additional indebtedness by such or other means, (c) the making, assignment, or recording of any lease or

sublease; and/or (d) the making, delivery, or recording of any deed or other instrument of transfer under, in furtherance of, or in connection with, the Plan, including any deeds, bills of sale, assignments, or other instrument of transfer executed in connection with any transaction arising out of, contemplated by, or in any way related to the Plan including in relation to the Real Properties, *shall not* be subject to any document recording tax, stamp tax, conveyance fee, intangibles or similar tax, mortgage tax, real estate transfer tax, personal property transfer tax, mortgage recording tax, Uniform Commercial Code filing or recording fee, regulatory filing or recording fee, or other similar tax or governmental assessment. Upon entry of this Confirmation Order, the appropriate state or local government officials or agents shall forego the collection of any such tax or governmental assessment and accept for filing and recordation any of the foregoing instruments or other documents without the payment of any such tax, recordation fee, or governmental assessment.

33. All filing or recording officers (or any other Person or Entity with authority over any of the foregoing), wherever located and by whomever appointed, shall comply with the requirements of section 1146(a) of the Bankruptcy Code, shall forego the collection of any such tax or governmental assessment, and shall accept for filing and recordation any of the foregoing instruments or other documents without the payment of any such tax or governmental assessment.

34. Notwithstanding anything to the contrary in the Plan, this Confirmation Order, the Bankruptcy Code, or the Bankruptcy Rules, the Plan Recovery Trustee shall have the independent right and authority to request a determination of any unpaid liability of the Consolidated Estate or Estates pursuant to, and in accordance with, section 505(b) of the Bankruptcy Code.

O. Disclosure of Tax Treatment

35. For purposes of United States federal income tax, the intended tax consequences described in Section 5.3.2 of the Plan supersede the description in Article VII of the Disclosure Statement to the extent of any inconsistency.

P. Examinations

36. Upon the Effective Date, the Plan Recovery Trustee shall have the independent right and authority to conduct examinations pursuant to Bankruptcy Rule 2004, including but not

limited to issuing notices and conducting examinations of any party in interest, without the need for further order of the Bankruptcy Court, in connection with the administration of the Plan, the Plan Recovery Trust Agreement, and investigation or prosecution of any Causes of Action.

Q. Final Decree Closing Certain Chapter 11 Cases

37. Within seven (7) calendar days after the Effective Date, the Plan Recovery Trust shall file a request for entry of a final decree and closure of the Chapter 11 Cases of the Debtors, other than the Consolidated Debtor (the "Final Decree Request"). The Final Decree Request shall be supported by a declaration that the Effective Date has occurred.

R. Payment of Statutory Fees

38. All fees pursuant to 28 U.S.C. § 1930, due and payable before the Effective Date, shall be paid by the Consolidated Debtor on or before the Effective Date. All such fees that arise after the Effective Date shall be paid by the Plan Recovery Trustee from Plan Recovery Trust Assets.

S. Reference to and Validity and Enforceability of the Plan Provisions

39. The failure to reference any particular provision in the Plan in this Confirmation Order shall have no effect on the binding effect, enforceability, or legality of such provision and such provision shall have the same binding effect, enforceability, or legality as every other provision of the Plan. Each term and provision of the Plan, as modified or interpreted by the Bankruptcy Court, is valid and enforceable pursuant to its terms.

T. Notice of Entry of Confirmation Order

40. Pursuant to Bankruptcy Rules 2002 and 3020(c)(2), the Consolidated Debtor is hereby directed to serve a notice of the entry of this Confirmation Order, and if it has occurred, the Effective Date, on all parties that received notice of the Confirmation Hearing, no later than twenty-one (21) calendar days after the date of this Confirmation Order; *provided*, *however*, that the Consolidated Debtor shall be obligated to serve such notice only on the record holders of Claims and Interests.

U. Retention of Jurisdiction

41. This Bankruptcy Court shall retain jurisdiction to the fullest extent permitted by the Plan and applicable law to enforce, implement, interpret and resolve issues and disputes with respect to the Plan and all matters related to the Plan.

****END OF ORDER****

COURT SERVICE LIST

All ECF Participants

EXHIBIT D

Matthew J. Renck

From: Ericka Cooper <lan65le@gmail.com>
Sent: Wednesday, August 26, 2026 12:30 PM
To: Gail S. Greenwood; Matthew J. Renck
Subject: nice try! service on home tax dated aug 24th 2026 certified
Attachments: 40617-54200-ISS030_6a8cae980558e.pdf; 40617-54201-COM045_6a8cae9849aa2.pdf

hello im ericka cooper serving you notice of summons in court case 26CV019064 in sacramento county superior court. accepted 08/24/2025
thank you
ericka cooper

ELECTRONICALLY FILED
Superior Court of California
County of Sacramento
08/21/2026
By: C. Leurgans Deputy

JACOB BOLDEN and AMARRA MOTT
6128 Elder Creek Road (mailing address)
Sacramento, California 95824
Telephone: (916) 585-1060
Email: jacobabolden@gmail.com
Plaintiffs In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

JACOB BOLDEN and AMARRA MOTT, Plaintiffs, v. HOME TAX SERVICE OF AMERICA, INC. dba LEFEVER MATTSON PROPERTY MANAGEMENT; KRISTINA MELICK a/k/a KRISTINA FOX; and DOES 1–50, inclusive, Defendants.	**Case No. 26CV019064** **FIRST AMENDED VERIFIED COMPLAINT — DECLARATORY & INJUNCTIVE RELIEF; WRONGFUL EVICTION (CCP § 1174.3); FORCIBLE ENTRY/DETAINER; CIV. CODE § 789.3; CONVERSION; TRESPASS TO CHATTELS; NEGLIGENCE** DEMAND FOR JURY TRIAL [UNLIMITED CIVIL]

Plaintiffs Jacob Bolden and Amarra Mott allege:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Jacob Bolden is an individual who openly, continuously, and peacefully resided at 5703 Orange Avenue, Sacramento, California 95823 (the "Property") for approximately two years before May 26, 2026. The Property was his residence, and Defendants and their agents knew of his occupancy.

2. Plaintiff Amarra Mott is an individual who resided at the Property from childhood until May 26, 2026, was listed as an occupant on the lease, and was 21 years old when removed. The Property was her lifelong residence.

3. Plaintiffs are collectively "Plaintiffs." Each allegation and cause of action applies to each Plaintiff individually as supported by that Plaintiff's possession, property, injuries, and damages.

4. Defendant Home Tax Service of America, Inc. ("Home Tax") is a California corporation that conducted residential property management concerning the Property under the fictitious name "LeFever Mattson Property Management" ("LFPM"), from 6359 Auburn Boulevard, Suite B, Citrus Heights, California.

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5. Defendant Kristina Melick, also known as Kristina Fox ("Melick"), is an individual who acquired an undivided 50 percent recorded interest in the Property by grant deed recorded July 24, 2024 as Sacramento County Document No. 20240724-0473, and who personally demanded rent from the Property's occupants under the name Kristina Fox.

6. The remaining recorded interest was held by LeFever Mattson, a California corporation. Home Tax and its LFPM DBA never held recorded title to the Property. LeFever Mattson's interest was subject to administration in its pending Chapter 11 bankruptcy. Plaintiffs do not presently name the debtor or estate representative and reserve amendment subject to the automatic stay, bankruptcy-court authority, and joinder requirements.

7. Plaintiffs are ignorant of the true names and capacities of defendants sued as DOES 1 through 50 and will amend when ascertained. Each Defendant acted directly or through agents, employees, vendors, and managing agents, and authorized, directed, participated in, or ratified the conduct stated below.

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8. Venue is proper because the Property is located and the acts and injuries occurred in Sacramento County. This Court has jurisdiction because Plaintiffs seek possession-related equitable relief and damages exceeding $35,000.

GENERAL ALLEGATIONS

THE THREE DISPOSITIVE FACTS

9. This action reduces to three facts, each established by Defendants' own documents, none ever adjudicated.

10. FIRST — AMARRA MOTT WAS NEVER NAMED. Plaintiff Amarra Mott has been listed by name on the lease for Unit 5703 since January 26, 2016 — "AND OTHER OCCUPANTS: Amarra Mott (minor), Khloe Mott (minor)" — on the original lease and again on Addendum Two, documents Defendants themselves produced at Bates PRT-Cooper 0027 and 0048. She resided in the home from childhood and was twenty-one years old and present on the day of the lockout. She was named in no complaint, no judgment, and no writ. The prejudgment claim procedure of Code of Civil Procedure section 415.46 — the exclusive mechanism by which a judgment can reach an

unnamed occupant — was never completed: the occupant article was mailed to the wrong ZIP code and never delivered, and the writ's own third page advised occupants of the very claim right that was refused when tendered. Sections 1174.3(a) and 715.020(d) therefore preserve her possessory claim as a matter of statute. Her name was in Defendants' file; her removal is undisputed; the judgment could not and did not adjudicate her interest.

11. SECOND — THE PLAINTIFF BELOW WAS NEVER AN OWNER, AND ITS OWN DOCUMENTS PROVE IT KNEW. The 2016 lease Defendants produced identifies the landlords as Robert and Charlene Hultman and identifies LeFever Mattson Property Management as "PROPERTY MANAGER NAME/AUTHORIZED AGENT" — the capacity the entity was designed for. Defendants' own November 23, 2021 notice under Civil Code section 1962 states that ownership passed to "LeFever Mattson, Inc. instead of Robert Hultman and Charlene Hultman" — an entity other than the UD plaintiff — while the plaintiff "will continue to manage the property." No deed, conveyance, or disclosure ever transferred ownership to the plaintiff; certified county records show title in Kristina Melick and LeFever Mattson, a California corporation, and the County Assessor rejected a later deed because the grantor did not match those record owners. On September 26, 2025, the plaintiff's own property manager — the same individual who signed the three-day notices attached to the eviction complaint — emailed occupant Ericka Cooper the complete lease file, which remains retrievable today; thirty-one days later, the complaint was filed citing "Lease, paragraph 24" while electing not to attach the lease that names the true owners and

defines the plaintiff as agent. And the plaintiff's counsel's own briefs preclude any claim of ignorance: counsel commented on the parties' capacities by footnote without suspicion or argument — commentary that presupposes knowledge — and, when pressed, would not swear to the verified capacity, arguing the action was proper "whether as sole owner or co-owner" while the complaint stood verified "as owner." A party that hedges between capacities knows both; a party that comments without suspicion has nothing to suspect because it already knows.

12. THIRD — THE ONLY AUTHORITY EVER ASSERTED WAS EXTINCT WHEN ASSERTED. On May 18, 2026, the plaintiff's counsel defended the eviction in the present tense "[a]s a debtor-in-possession... authorized under 11 U.S.C. §§ 1107–1108 to pursue... recovery of possession of real property of the bankruptcy estate." Debtor-in-possession status terminated at the April 23, 2026 plan confirmation, twenty-five days before that brief; the plan's Effective Date passed May 14, four days before it; and the lockout followed on May 26 — executed under a fiduciary status that no longer existed, with no authority from record co-owner Melick and no order of the bankruptcy court authorizing eviction ever documented, verified, or adjudicated. The

assertion is simultaneously an admission that the eviction was administration of another's property, a repudiation of the sworn "owner" capacity, and a claim of power from a source that had already expired.

13. Everything else in this complaint — the manufactured default, the one-act service, the misdirected notices, the refused claims of right, the destroyed property, the deteriorating vacant house — flows from these three facts. None of the three has ever been heard by any court.

A. Plaintiffs' Independent Possession Was Never Adjudicated

14. On October 27, 2025, an unlawful-detainer action concerning the Property was commenced as Sacramento Superior Court Case No. 25UD006079 in the name "LeFever Mattson Property Management" against Major Mott III and Erica Cooper. Neither Jacob Bolden nor Amarra Mott was named, served, or made an appearance.

15. On February 23, 2026, the clerk entered a possession-only default judgment for $0 against the named defendants. No judicial officer heard evidence concerning Plaintiffs' possession. The judgment did not adjudicate either Plaintiff's independent right to possession and did not cancel or

forfeit the rental agreement.

16. The writ states that a Prejudgment Claim of Right to Possession was not served under Code of Civil Procedure section 415.46. Plaintiffs therefore retained the right provided by section 1174.3 to object to enforcement of the judgment against them.

17. Jacob Bolden attempted to present a Claim of Right to Possession at least three times: on or about April 13, 2026 at the Sheriff's Civil Bureau, on or about May 6, 2026, and on May 26, 2026 during execution. Each attempt was refused. [BEFORE FILING, INSERT THE PRECISE FORM, IDENTIFICATION, FEE-WAIVER, AND PERSON WHO REFUSED EACH PRESENTATION.]

18. Amarra Mott was a lease-listed occupant, was never named or served, received no prejudgment claim, and was removed without a hearing or adjudication of her possession.

B. Home Tax Was Not the Owner and Its Claimed Authority Had Been Displaced and Contested

19. Before either UD complaint was filed, recorded co-owner Melick/Fox informed the occupants in writing that LFPM was merely the property-management company, LFPM was no longer collecting rent, rent must instead be paid to Melick/Fox or Chris Bendinelli, and Melick/Fox would be the contact moving forward because LFPM was in bankruptcy.

20. On September 25, 2025, the occupants requested confirmation from LFPM of the current ownership, management, payment authority, active lease, and amount claimed.

21. On September 26, 2025, LFPM responded through Tayler Bachart. LFPM supplied only a November 23, 2021 ownership notice, omitted Melick's recorded July 24, 2024 interest, confirmed possession of the original lease and amendments, defended a $20,320 three-day notice, and expressly signed as "Property Manager."

22. Melick/Fox's written instructions displaced LFPM's authority to collect rent on her behalf and placed any claimed continuing authority in direct dispute. Home Tax produced no assignment, current management agreement, co-owner authorization, trustee authorization, debtor-in-possession authorization, or bankruptcy-court order authorizing Home Tax or LFPM to act or sue as owner.

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23. The lease and LFPM's own September 26 response identified LFPM's management capacity. Home Tax and LFPM were not record owners and could not truthfully convert their disputed management role into ownership.

C. LFPM Used an Inactive Licensed Fictitious Name for the Notices and Original UD

24. Official licensing records show that Home Tax's broker license No. 01243523 carried the fictitious name "LeFever Mattson Property Management" only through December 1, 2024 and did not carry that name again until November 3, 2025. Salesperson license No. 02188366 ceased affiliation with Home Tax on December 1, 2024 and thereafter was affiliated with a different responsible broker.

25. During the inactive-name period, Home Tax used "LeFever Mattson Property Management" to issue the May 12, 2025 three-day notice demanding $6,770, issue September 2025 notices including a $20,320 demand, collect or demand rent, and commence the original UD on October 27, 2025.

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26. The licensed fictitious name returned to Home Tax's broker license on November 3, 2025—the same date the First Amended UD was verified. Restoration of the name did not retroactively authorize the prior notices or original action and did not convey ownership, an assignment, or authority from either record owner or the bankruptcy estate.

D. LFPM Repeated the False Owner Capacity After Amending the UD

27. The original UD identified the premises as Carmichael, California and affirmatively checked that LFPM sued "as owner."

28. LFPM then prepared the First Amended UD, corrected the premises address to Sacramento, and thereby demonstrated that it reviewed and revised the pleading. Despite this second opportunity, LFPM again checked "as owner," left the fictitious-business-name compliance allegation unchecked, did not identify Home Tax as the entity behind the DBA, and did not plead agency, assignment, co-owner authorization, or bankruptcy authority. The First Amended UD was verified on November 3, 2025.

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29. Before filing and amendment, LFPM possessed the lease establishing its management role, knew Melick/Fox held a recorded interest, knew Melick/Fox redirected rent away from LFPM, and knew the occupants had challenged its authority. LFPM nevertheless retained the "as owner" representation.

30. LFPM omitted the lease from the UD record despite confirming possession of it. The omission kept the contradiction between LFPM's agency role and asserted ownership out of the clerk-default record.

31. On July 9, 2026, the Sacramento County Assessor rejected processing of a later deed because the grantor did not match the owners in its records and identified the owners as "MELICK KRISTINA" and "LEFEVER MATTSON," not Home Tax or LFPM.

32. Plaintiffs discovered and assembled the filed "as owner" representation, September 26 property-manager admission, recorded-title conflict, inactive licensed fictitious-name period, amendment timing, and assessor rejection on the dates stated in their accompanying declarations and records. These documents establish a connected prefiling and postfiling sequence, not an

isolated clerical error.

E. The Notices and Nonpayment Eviction Were Statutorily Defective

33. The July 24, 2024 deed triggered Civil Code section 1962's requirement to disclose and keep current the name and address of each owner and authorized manager and the person to whom rent was payable. No Defendant supplied a compliant disclosure within 15 days or before the demanded rent accrued.

34. Civil Code section 1962(c) prohibited a noncomplying successor owner or manager from serving a Code of Civil Procedure section 1161(2) notice or otherwise evicting for nonpayment of rent accruing during noncompliance. The rent demanded in 2025 included rent accruing after July 24, 2024.

35. The occupants received materially conflicting demands. LFPM notices demanded $6,770, $15,240, or $20,320 and directed payment to LFPM. Melick/Fox separately directed payment to herself or Chris and stated LFPM was not collecting rent. Her notice described $15,240 as the "last twelve months" while listing May 1, 2023 through September 1, 2025 and multiple payment

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persons or locations.

36. These conflicts deprived the occupants of an unambiguous person, amount, period, and method by which to cure. Combined with LFPM's false owner capacity, inactive licensed fictitious name, and lack of disclosed authority, no valid section 1161(2) predicate notice terminated Plaintiffs' possession.

37. Defendants' ledger and demands were also inconsistent. The ledger reflects household payments and amounts different from the notices. LFPM pursued possession while court-ordered stay payments tendered in April and May 2026 were returned uncashed.

F. Lockout, Boarding, and Removal of Property

38. On May 26, 2026, the Sheriff executed the writ against the named defendants, and Defendants took possession from Plaintiffs even though Plaintiffs were not named, no section 415.46 prejudgment procedure had been used, and Plaintiffs' possessory rights had never been heard.

39. Defendants caused the locks to be changed and paid a locksmith $439 that morning. Plaintiffs were excluded from their residence.

40. On June 1, 2026, the household served a written demand to preserve all personal property. A June 14, 2026 invoice billed to “Lefever Mattson” shows payment of $5,500 to haul away household property and, “per Brenda,” board and secure the Property.

41. Plaintiffs’ personal property was seized, withheld, removed, destroyed, or disposed of without consent and without compliance with the storage, notice, and return procedures governing residential property.

42. The Property has remained vacant and boarded. No replacement occupant would be displaced by restoring Plaintiffs, while Plaintiffs continue to suffer displacement, loss of housing, loss of use, property loss, and emotional distress.

G. The Filed Service Record Proves No Occupant Was Ever Served

43. The proof of service filed in the UD action (POS-010, executed December 13, 2025 by Darnella Hendrix, Priority Process Pros, Solano County registration no. 404) describes the entirety of claimed service as a single act: "By Posting on front door on 12/13/2025 at 3:30 PM and by mailing Certified mail, first class, prepaid from Vacaville, California on 12/13/2025. Per Court

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Order. (CCP §§ 415.45 and 415.46)." One posting and one mailing were thus claimed to satisfy simultaneously the court-ordered posting service on each named defendant under section 415.45 and the separate prejudgment-claim service on all unnamed occupants under section 415.46.

44. The wrong-address defect originated in the UD complaint itself. Item 3.a of the original complaint, filed October 27, 2025, stated the premises address as "5703 Orange Avenue, Carmichael CA 95608," while item 3.b of the same page alleged the premises lie "within the city limits of Sacramento." The premises is in Sacramento, ZIP 95823. Every subsequent mailing artifact repeated the complaint's error: the Court's own Notice of Filing (Code Civ. Proc. § 1161.2), issued October 30, 2025, was addressed solely to Major Mott III at "5703 Orange Avenue, Carmichael, CA 95608."

45. The certified-mail article addressed to "All Other Occupants" at ZIP 95608, tracking number 7020 3160 0000 2522 7913, was never delivered. United States Postal Service records show "Notice Left (No Authorized Recipient Available)" on December 22, 2025 and a redelivery reminder on December 27, 2025, with no delivery event. Section 415.46 service to the premises

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therefore never reached the premises. No proof of service of the Prejudgment Claim of Right to Possession in compliance with section 415.46 appears in the court file, and the tendered statutory claims described below were refused.

46. THE TWIN ENVELOPES FAILED TOGETHER. The mailing component of the December 13, 2025 service consisted of two certified articles prepared by the same office and deposited in the same batch from Vacaville: one jointly addressed to both named defendants, and one addressed to "All Other Occupants." The occupants' article is proven undelivered by United States Postal Service records — wrong ZIP code, "Notice Left" December 22, no delivery event. The joint article's return-receipt card remains in the possession of the UD plaintiff's counsel, unsigned and without postal markings, and was displayed by counsel in open court; because a return receipt travels attached to its envelope until delivery detaches it, a card in the sender's unsigned possession establishes that the entire envelope was returned undelivered. On information and belief, both articles bore the same address block and the same erroneous ZIP code and failed in the same manner, for the same reason, at the same time. Service under section 415.45 is complete only ten

days after posting AND mailing; a mailing that never reached the defendants' address never occurred within the meaning of the statute, the response period never commenced, and the default and judgment resting upon it are void. Plaintiffs will seek in discovery both original envelopes, both certified article numbers, both complete tracking histories, and Defendants' returned-mail records.

47. The mailing component of the section 415.45 posting order likewise failed. On information and belief, a single certified article was jointly addressed to both named defendants rather than separately to each, and its return-receipt card — handwritten "To: Major Mott and Ericka Cooper" — remained in the possession of the UD plaintiff's counsel, unsigned by any recipient and bearing no postal delivery markings, and was displayed by counsel in open court. A return receipt in the sender's possession without a recipient signature evidences non-delivery.

48. On May 26, 2026, at the Property and thereafter at the Sacramento County Sheriff's civil division, Plaintiff Bolden tendered a Claim of Right to Possession (CP10.5) and was refused. Personnel asserted that occupant service had "already" been made. That assertion is contradicted by

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the writ's own statement that section 415.46 service was not made and by the undelivered certified article. Refusal of a tendered claim without requiring the UD plaintiff to prove valid section 415.46 service deprived Plaintiffs of the mandatory procedure of sections 1174.3 and 715.020(d).

H. The Verification and Name Record Shows Knowledge

49. No officer, employee, or agent of Home Tax or LFPM ever verified the UD complaint or its amendment. Both verifications — executed October 23, 2025 and November 3, 2025, at Vacaville — were signed only by the UD plaintiff's attorney, on information and belief, invoking the party's absence from Solano County, the county of counsel's own office. The entity that possessed the lease, the ledger, and the ownership records swore to nothing.

50. Item 2.b of the original complaint — the printed allegation that plaintiff "has complied with the fictitious business name laws" — was left unchecked. The fictitious name "LeFever Mattson Property Management" was in fact inactive from December 1, 2024 until restored on November 3, 2025 — after the rent notices issued and after the original complaint was filed. The restoration occurred the same day the amended complaint's verification was executed, evidencing

contemporaneous knowledge of the lapse.

I. The Premises Remains Vacant and Deteriorating in Defendants' Control

51. As of August 14, 2026, dated photographs show the Property vacant and boarded, with plywood over window openings, the front landscaping and garden dead, a disconnected downspout, debris, a damaged garage door, and household laundry appliances left outdoors exposed to the weather. No third party is in possession. Restoration of Plaintiffs displaces no one, and the asset is deteriorating under Defendants' exclusive control.

FIRST CAUSE OF ACTION — DECLARATORY AND INJUNCTIVE RELIEF

52. Plaintiffs incorporate paragraphs 1 through 37.

53. An actual controversy exists whether the UD judgment and writ could lawfully be enforced against Plaintiffs; whether their possession was terminated; whether LFPM had authority to serve notices or sue as owner; whether Civil Code section 1962(c) barred the nonpayment eviction; and whether Plaintiffs are entitled to restoration.

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54. Plaintiffs seek declarations that the judgment did not bind or adjudicate them, LFPM was not the owner, the predicate notice did not terminate their rights, and their possession was never lawfully adjudicated or terminated. Plaintiffs also seek preliminary and permanent orders preserving the Property and remaining personal property and restoring Plaintiffs to possession.

SECOND CAUSE OF ACTION — WRONGFUL EVICTION / DEPRIVATION OF CCP § 1174.3 RIGHTS

55. Plaintiffs incorporate paragraphs 1 through 40.

56. Plaintiffs occupied the Property when the UD was filed, were not named in the judgment, and were not served with a prejudgment claim under section 415.46. Section 1174.3 preserved their right to present a claim and obtain a hearing before removal.

57. Defendants procured, directed, accepted, or ratified Plaintiffs' removal without adjudication of their possession and despite Bolden's attempted claims. The removal proximately caused displacement expenses, loss of use and quiet enjoyment, property loss, emotional distress, and other damages according to proof.

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THIRD CAUSE OF ACTION — FORCIBLE ENTRY / FORCIBLE DETAINER (CCP §§ 1159–1160)

58. Plaintiffs incorporate paragraphs 1 through 43.

59. Plaintiffs were in peaceful residential possession. Defendants caused entry, rekeying, boarding, exclusion, and continued detention against Plaintiffs, whose possession had not been adjudicated and against whom no judgment ran.

60. Plaintiffs seek restitution of the premises, actual damages, and treble damages to the extent authorized by Code of Civil Procedure section 1174(b).

FOURTH CAUSE OF ACTION — CIVIL CODE § 789.3

61. Plaintiffs incorporate paragraphs 1 through 46.

62. With intent to terminate Plaintiffs' residential occupancy, Defendants willfully prevented reasonable access by changing the locks and boarding the Property and removed Plaintiffs' personal property without consent or compliance with Civil Code section 1980 et seq. The UD judgment did not adjudicate Plaintiffs and therefore did not constitute a lawful eviction of them.

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63. Each Plaintiff seeks actual damages, statutory damages up to $100 for each day or part of a day Defendants remained in violation, the statutory minimum for each separate cause of action, attorney's fees and costs, and preliminary and permanent injunctive relief under Civil Code section 789.3(c)–(d).

FIFTH CAUSE OF ACTION — CONVERSION

64. Plaintiffs incorporate paragraphs 1 through 49.

65. Each Plaintiff owned and possessed personal property at the Property. Defendants intentionally exercised dominion by seizing, withholding, removing, hauling away, destroying, or disposing of it after a written preservation demand, substantially interfering with Plaintiffs' rights.

66. Plaintiffs seek the value of property, consequential damages, prejudgment interest, return of identifiable property, and punitive damages according to proof.

SIXTH CAUSE OF ACTION — TRESPASS TO CHATTELS

67. Plaintiffs incorporate paragraphs 1 through 52.

68. In the alternative to conversion, Defendants intentionally interfered with Plaintiffs' possession

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and use of personal property, causing damage, deprivation of use, and consequential loss.

SEVENTH CAUSE OF ACTION — NEGLIGENCE

69. Plaintiffs incorporate paragraphs 1 through 54.

70. Defendants owed known residential occupants a duty of reasonable care in verifying authority, directing enforcement, handling claims of possession, and storing and returning personal property. Defendants breached those duties by the conduct stated above, proximately causing Plaintiffs' injuries.

71. Plaintiffs invoke Evidence Code section 669 to the extent the proven violations of Civil Code sections 789.3, 1962, 1965, and 1980 et seq.; Code of Civil Procedure sections 1174 and 1174.3; and applicable licensing requirements satisfy each statutory element.

PUNITIVE DAMAGES

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72. Every material falsehood in the UD action was known to be false before it was first filed, and each was repeated by deliberate election after an opportunity to correct it. Before October 27, 2025, the UD plaintiff's own records established: that "LeFever Mattson Property Management" was a fictitious name of Home Tax Service of America, Inc. — not a corporation and not an owner — yet the complaint pleaded a corporate plaintiff suing "as owner"; that the operative lease, in LFPM's own possession, identified LFPM as property manager and listed Amarra Mott as an occupant, yet no occupant was named or served and the lease was withheld from the pleading; that the May 2025 three-day notice demanded $6,770 while later demands of $15,240 and $20,320 could not be reconciled with it or with the $1,270 monthly rent; that Civil Code section 1962 disclosures had never been made after the July 2024 ownership change; and that the record co-owner had personally redirected rent away from LFPM and instructed the tenant in writing that Melick/Fox was the point of contact going forward — establishing LFPM's actual knowledge that its collection and eviction authority was displaced and contested.

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73. The verification record establishes election, not error. The complaint was verified October 23, 2025 by counsel alone, on information and belief; no person who had seen the lease, the ledger, or the title record swore to anything. When the complaint was amended, every known falsehood could have been corrected. Instead, on November 3, 2025 — the same day the lapsed fictitious-name registration was quietly restored — the amendment re-verified the same owner capacity, the same corporate designation, the same unnamed occupants, and the same irreconcilable amounts, again by counsel alone on information and belief. Two verifications, two opportunities to tell the truth, and the same election both times. A single act may be mistake; the same act repeated after an opportunity to correct is choice.

74. The service record completes the pattern: one posting and one Vacaville mailing were stretched across three distinct service obligations; the occupants' certified article went to the wrong ZIP code and was never delivered; the joint return-receipt card remained unsigned in counsel's possession; and when Plaintiff Bolden tendered the statutory claim the pattern was defended with the false assertion that service had "already" been made. Plaintiffs — a lease-listed occupant and a two-year

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resident — were removed from their home by a judgment that named neither of them, on service that reached no one, procured by verified statements their makers had elected twice not to correct. That course of conduct constitutes oppression, fraud, and malice within the meaning of Civil Code section 3294, and as to the concealment that prevented Plaintiffs' claims from being heard, extrinsic fraud.

75. Plaintiffs seek punitive damages under Civil Code section 3294 against each culpable individual and against Home Tax upon proof of authorization, advance knowledge, or ratification by an officer, director, or managing agent.

PRAYER FOR RELIEF

WHEREFORE, each Plaintiff requests judgment against Defendants as follows:

• A declaration that Plaintiffs' possessory rights were never adjudicated or lawfully terminated and that the UD judgment and writ were unenforceable against them;

• A declaration that Home Tax/LFPM was not the owner and did not establish an assignment or authority to sue in the owner capacity pleaded;

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• A temporary restraining order, order to show cause, preliminary injunction, and permanent injunction preserving the premises and remaining property and restoring Plaintiffs to possession;

• Restitution of the premises under Code of Civil Procedure section 1159 et seq.;

• Actual, consequential, and general damages according to proof, separately for each Plaintiff;

• Statutory damages under Civil Code section 789.3(c) and treble damages to the extent authorized by law;

• Return or value of converted property, consequential damages, and prejudgment interest;

• Punitive damages under Civil Code section 3294;

• Attorney's fees and costs under Civil Code section 789.3(d) and other applicable law;

• Prejudgment and postjudgment interest; and

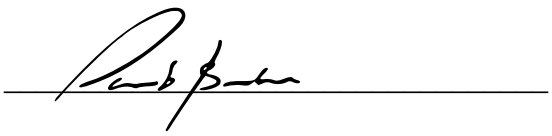
• Further legal and equitable relief the Court deems just.

DEMAND FOR JURY TRIAL

Plaintiffs demand a jury trial on every triable issue.

Dated: August 19th, 2026

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JACOB BOLDEN, Plaintiff In Propria Persona

Dated: August 19th, 2026



AMARRA MOTT, Plaintiff In Propria Persona

VERIFICATION

We are Plaintiffs in this action. We have read this First Amended Verified Complaint and know its contents. The matters stated from our own knowledge are true. Matters stated on information and belief are believed true. We declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August ___, 2026, at Sacramento, California.

Dated: August 19th, 2026



JACOB BOLDEN, Plaintiff

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Dated: August 19th, 2026



AMARRA MOTT, Plaintiff

COMPLETE AND DELETE EVERY BRACKETED FACTUAL INSTRUCTION BEFORE

SIGNING OR FILING.

BOLDEN & MOTT — CASE NO. 26CV019064 |

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JACOB BOLDEN and AMARRA MOTT
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Plaintiffs In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

JACOB BOLDEN and AMARRA MOTT, Plaintiffs, v. HOME TAX SERVICE OF AMERICA, INC. dba LEFEVER MATTSON PROPERTY MANAGEMENT; KRISTINA MELICK a/k/a KRISTINA FOX; and DOES 1–50, inclusive, Defendants.	**Case No. 26CV019064** **INDEX OF EXHIBITS TO FIRST AMENDED VERIFIED COMPLAINT AND EX PARTE APPLICATION**

Exhibit 1. 2016 Residential Lease Agreement, Bates PRT-Cooper 0027 (Defendants' own production): landlords Robert and Charlene Hultman; LFPM as 'Property Manager/Authorized Agent'; occupants including 'Amarra Mott (minor)'; term commencing 01/26/16; rent $1,025.

Exhibit 2. Addendum Two (Bates PRT-Cooper 0048) and Addendum Three (Nov. 22, 2022): occupant listing continued; LFPM's later self-designation as 'Landlord'; rent $1,270 effective Jan. 1, 2023.

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Exhibit 3. Notice of Change of Ownership, Nov. 23, 2021 (Civ. Code §§ 1962, 1947.12): ownership to 'LeFever Mattson, Inc. instead of Robert Hultman and Charlene Hultman.'

Exhibit 4. Original UD Complaint (filed Oct. 27, 2025): item 3.a 'Carmichael CA 95608'; item 2.b unchecked; item 4 'as owner'; attorney verification Oct. 23, 2025 — and First Amended UD Complaint with attorney verification Nov. 3, 2025.

Exhibit 5. September 26, 2025 email from Defendants' property manager transmitting the complete lease file and three-day notices to occupant Ericka Cooper (retrievable to date).

Exhibit 6. Proof of Service POS-010 (Darnella Hendrix, Dec. 13, 2025): single posting and mailing invoked under CCP §§ 415.45 and 415.46.

Exhibit 7. USPS tracking record and envelope, certified article 7020 3160 0000 2522 7913, 'All Other Occupants,' ZIP 95608: Notice Left Dec. 22, 2025; no delivery event.

Exhibit 8. Certified Writ of Possession EJ-130 (issued Apr. 2, 2026), including page 3 occupant claim-of-right advisement; Sheriff Notice to Vacate.

Exhibit 9. Proof of residency of Plaintiff Bolden at the premises (billing record).

Exhibit 10. Locksmith receipt, May 26, 2026, 10:21 a.m., $439.00, delivered to Defendants' agent Brenda Comfort (Bates PRT-Cooper 0089); June 14, 2026 invoice, $5,500, to remove household property and board windows 'per Brenda'; mileage records ('Tenant Lockout').

Exhibit 11. Written preservation demand of June 1, 2026.

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Exhibit 12. Dated photographs, Aug. 14, 2026: premises vacant, boarded, deteriorating; household appliances outdoors.

Each exhibit is a true and correct copy of the document described, authenticated by the verifications and declarations filed herewith, and incorporated by reference in the First Amended Verified Complaint.

Dated: August 19th, 2026

Jacob Bolden, Plaintiff Amarra Mott, Plaintiff

Case: 24-10545 Doc# 4588 Filed: 10/06/26 Entered: 10/06/26 17:58:55 Page 71 of 162
EXHIBIT INDEX V3 – MATCHED TO FAC V3

EXHIBIT 1

2016 Residential Lease (Bates PRT-Cooper 0027) with signed Move-In Receipt, Jan. 26, 2016 — Security Deposit $1,025.00

RESIDENTIAL LEASE AGREEMENT

1. **TENANT(s)**: Major Mott III, Erica Cooper

   AND OTHER OCCUPANTS: Amarra Mott (minor), Khloe Mott (minor)
   No persons other than those listed above may reside in the premises. All persons listed above are subject to all of the terms and provisions of this residential Rental Agreement. No other persons, regardless of age, shall occupy or reside at the premises. Anyone residing including but not limited to staying overnight at the premises more than three (3) days in any thirty day period shall be considered an unauthorized subtenant and an incurable violation of the rental agreement.

2. **LANDLORD NAME**: Robert Hultman and Charlene Hultman Telephone #: 916-723-5111

   PROPERTY MANAGER NAME/AUTHORIZED AGENT: LeFever Mattson Property Management

   Address: 6359 Auburn Boulevard, Suite B, Citrus Heights, CA 95621 Telephone # (916) 723-5111
   If Agent is specified above, this person/entity is the designated Agent for receipt of papers from the Tenant.

3. **TENANCY ADDRESS:** 5703 Orange Avenue, Sacramento, CA 95823

4. **TERM:** The term of this lease shall be for a period commencing 01/26/16 and terminating 02/29/16. After the lease maturity date this agreement shall continue on a month to month basis until either party shall terminate the tenancy by giving the other a written thirty (30) day notice of intent to terminate tenancy. Neither the Landlord nor the Tenant are required by this agreement to state the reasons for the election to vacate thirty days from the date of the written notice. The tenancy will be considered terminated upon the passage of the thirty days from the date of the mailing or delivery of the "30 *Day Notice of Intent to Vacate.*"

5. **MONTHLY RENT**: $1,025.00 per month. RENT DEFINED: All monetary obligations of Tenant to Landlord under the terms of this Lease Agreement (except for any amount designated as a security deposit) are deemed to be rent. Rent is due and must be received by the Landlord IN ADVANCE on or before the first day of each month. Rent shall be considered late and "due and unpaid" if not actually received by the Landlord on or before the first day of each calendar month. The first month will need to be in the form of a cashier's check or money order and will not be pro-rated. A full month's rent will be collected and a pro-rate if any, will be paid on or before the first day of the following month.

   Rent is payable to the following person or entity: **LEFEVER MATTSON PROPERTY MANAGEMENT**

   Pay Rent as follows: [X] Personal Check [X] Cashier's Check [X] Money Order

   Third party checks are not permissible. Postdated checks are not permissible. Tenant/(s) in receipts of a 3 Day Notice… will be required to pay rent in the form of [X]Cashier's Check [X]Money Order until 3 Day Notice has been rectified.

   All payments must be made "in advance" on or before the first (1st day of each calendar month, without offset or deductions of any kind, to the name of the Landlord or Landlord's Authorized Agent specified above, as follows:

   Rent may be paid by either:
   [X] Mail or Personal Delivery: The usual days and hours for personal delivery of the rent and other sums due are:
   Days: Monday-Friday Hours: 8:30 a.m. - 5:00 p.m.
   There is also a drop slot that is available all the time.
   Address: 6359 Auburn Boulevard, Suite B, Citrus Heights, CA 95621 Telephone #: (916) 723-5111
   If the rent is lost in the mail, it has not been paid.

Tenant Init. MM Tenant Init. EC Agent Init. KM

PRT-Cooper 0027

LEFEVER MATTSON
PROPERTY MANAGEMENT

RECEIPT FOR RENTAL / MOVE-IN PAYMENT

Cash Payments Not Accepted

Payments Previously Paid:

Application Fees: (Cash OK) If waived applicant initials _____	$ 70.00
Holding Deposit:	$1,025.00
Other: _____	$
Total Payments Previous Paid:	$1,095.00

Payments due at signing / move-in:

Rent:	$1,025.00
Security Deposit:	$1,025.00
Move-In Special (If any):	$
Application Fee:	$ 70.00
Other: _____	$
Less amounts previously paid from above:	$(1,095.00)
Net amount due and paid at signing / move-in:	$1,025.00

Tenant Acknowledgement:
By signing this document your are indicating that the amounts listed above accurately represent the amounts charged and paid for the rental unit indicated. Do not sign this document if the amounts are not correct. If you are asked to pay any amount other that that identified please contact the corporate offices of LeFever Mattson Property Management at 916-723-5111 x104.

Tenant 1/26/16 Date

Karen Mallott 1/26/16
Landlord/Agent Date

Tenant 1/26/16 Date

Prorated Rent Due on the 1st of the month following move-in: **$201.63**

Tenant Init. _____ Tenant Init. EC Agent Init. _____

EXHIBIT 2

Addendum Two (PRT-0048/0062); Addendum Three (Nov. 22, 2022 — LFPM self-designated 'Landlord'); Feb. 21, 2019 § 827 notice (correct Sacramento 95823 address)

ADDENDUM TWO TO RESIDENTIAL LEASE AGREEMENT

1. TENANT(s): Major Mott III, Ericka Cooper

AND OTHER OCCUPANTS: Amarra Mott (minor), Khloe Mott (minor)
No persons other than those listed above may reside in the premises. All persons listed above are subject to all of the terms and provisions of this residential Rental Agreement. No other persons, regardless of age, shall occupy or reside at the premises. Anyone residing including but not limited to staying overnight at the premises more than three (3) days in any thirty day period shall be considered an unauthorized subtenant and an incurable violation of the rental agreement.

2. **LANDLORD NAME**: Robert Hultman and Charlene Hultman Telephone #: 916-723-5111

PROPERTY MANAGER NAME/AUTHORIZED AGENT: LeFever Mattson Property Management

Address: 6359 Auburn Boulevard, Suite B, Citrus Heights, CA 95621 Telephone # (916) 723-5111
If Agent is specified above, this person/entity is the designated Agent for receipt of papers from the Tenant.

3. **TENANCY ADDRESS**: 5703 Orange Avenue, Sacramento, CA 95823

IN CONSIDERATION OF THEIR MUTUAL PROMISES, LANDLORD AND TENANT AGREE AS FOLLOWS:

A. The lease term shall be extended through on September 30, 2018.

B. Beginning October 1, 2017, the rent shall be $1,110.00 instead of $1,075.00, the current month's rent.

C. Amend Paragraph 27. Hold Over – Any holding over at the expiration of this modified lease shall create a month-to-month tenancy. All other terms and conditions herein shall remain in full force and effect.

D. Except as herein provided, all other terms of the lease/rental agreement shall remain in full and effect.

E. This addendum to be effective as of September 29, 2017.

Dated: 10-18-17 Tenant: Ericka Cooper

Dated: 10-18-17 Tenant: Major Mott

Dated: 10/23/17 Agent: Karen Mullett

ADDENDUM TWO TO RESIDENTIAL LEASE AGREEMENT

1. TENANT(s): Major Mott III, Ericka Cooper

AND OTHER OCCUPANTS: Amarra Mott (minor), Khloe Mott (minor)
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2. **LANDLORD NAME**: Robert Hultman and Charlene Hultman Telephone #: 916-723-5111

PROPERTY MANAGER NAME/AUTHORIZED AGENT: LeFever Mattson Property Management

Address: 6359 Auburn Boulevard, Suite B, Citrus Heights, CA 95621 Telephone # (916) 723-5111
If Agent is specified above, this person/entity is the designated Agent for receipt of papers from the Tenant.

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A. The lease term shall be extended through on September 30, 2018.

B. Beginning October 1, 2017, the rent shall be $1,110.00 instead of $1,075.00, the current month's rent.

C. Amend Paragraph 27. Hold Over – Any holding over at the expiration of this modified lease shall create a month-to-month tenancy. All other terms and conditions herein shall remain in full force and effect.

D. Except as herein provided, all other terms of the lease/rental agreement shall remain in full and effect.

E. This addendum to be effective as of September 29, 2017.

Dated: 10-18-17 Tenant: Ericka Cooper

Dated: 10-18-17 Tenant: Major Mott

Dated: 10/23/17 Agent: Karen Mullett

LEFEVER MATTSON
PROPERTY MANAGEMENT

6359 Auburn Boulevard, Suite B
Citrus Heights, CA 95621

Telephone (916) 723-5111
FAX (916) 676-0011

ADDENDUM THREE TO RESIDENTIAL LEASE AGREEMENT

1. TENANT(s): Major Mott III and Erica Cooper

   AND OTHER OCCUPANTS:
   No persons other than those listed above may reside in the premises. All persons listed above are subject to all of the terms and provisions of this residential Rental Agreement. No other persons, regardless of age, shall occupy or reside at the premises. Anyone residing including but not limited to staying overnight at the premises more than three (3) days in any thirty day period shall be considered an unauthorized subtenant and an incurable violation of the rental agreement.

2. LANDLORD NAME: LeFever Mattson Property Management
   Telephone #: 916-723-5111

   PROPERTY MANAGER NAME/AUTHORIZED AGENT: LeFever Mattson Property Management

   Address: 6359 Auburn Boulevard, Suite B, Citrus Heights, CA 95621 Telephone # (916) 723-5111
   If Agent is specified above, this person/entity is the designated Agent for receipt of papers from the Tenant.

3. TENANCY ADDRESS: 5703 Orange Ave., Sacramento CA 95823

IN CONSIDERATION OF THEIR MUTUAL PROMISES, LANDLORD AND TENANT AGREE AS FOLLOWS:

A. The term of this lease shall be extended to 01/31/2024. Any holding over at the expiration of this lease shall create a month-to-month tenancy.

B. Beginning January 1, 2023, the rent shall be $1,270.00 instead of $1,165.00, the current month's rent.

C. Amend Paragraph 27. Hold Over – Any holding over at the expiration of this modified lease shall create a month-to-month tenancy. All other terms and conditions herein shall remain in full force and effect.

E. Except as herein provided, all other terms of the lease/rental agreement shall remain in full and effect.

F. This addendum to be effective as of November 22, 2022.

Dated: 11-22-22 Tenant: Erica

Dated: 11-22-22 Tenant: Major Mott

Dated: 11/22/2022 Agent: Colleen Comfort

LEFEVER MATTSON
PROPERTY MANAGEMENT

6359 Auburn Boulevard, Suite B
Citrus Heights, CA 95621

916.723.5111
FAX 916.676.0011

Lease Renewal / Change of Terms Notice

Major Mott III, Erica Cooper
5703 Orange Avenue
Sacramento, CA, 95823

To: Major Mott III, Erica Cooper of the premises designated by the number and street as 5703 Orange Avenue, in the city of Sacramento, State of California, 95823. You are hereby notified, in accordance with Civil Code Section 827, that 30 days after service upon you of this Notice, or April 1, 2019, whichever is later, your tenancy of the premises will be changed as follows:

1. The late charge has been changed to $70.00 per occurrence instead of $35.00 per occurrence.

2. Except as herein provided, all other terms of your tenancy shall remain in full force and effect.

As required by law, you are hereby notified that a negative credit report reflecting on your credit history may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

2/21/2019
Date

Agent

EXHIBIT 3

Nov. 23, 2021 Notice of Change of Ownership (§§ 1962, 1947.12) — ownership to 'LeFever Mattson, Inc. instead of Robert Hultman and Charlene Hultman'

LEFEVER MATTSON
PROPERTY MANAGEMENT

6359 Auburn Boulevard, Suite B
Citrus Heights, CA 95621

Telephone (916) 723-5111
FAX (916) 676-0011

NOTICE OF CHANGE OF OWNERSHIP - NOTICE OF CHANGE
[Pursuant to Civil Code § 1962 & 1947.12]

To: Major Mott III and Ericka Cooper
and any others at:
5703 Orange Avenue
Sacramento, CA 95823

Subject Premises: 5703 Orange Avenue, Sacramento, CA 95823

YOU ARE HEREBY ADVISED AS FOLLOWS:

1. The property described above ownership is LeFever Mattson, Inc. instead of Robert Hultman and Charlene Hultman

2. The property where you reside is not subject to the rent limits imposed by Section 1947.12 of the Civil Code and is not subject to the just cause requirements of Section 1946.2 of the Civil Code. This property meets the requirements of Sections 1947.12 (c)(5) and 1946.2 (c)(7) of the Civil Code and the owner is not any of the following: (1) a real estate investment trust, as defined by Section 856 of the Internal Revenue Code; (2) a corporation; or (3) a limited liability company in which at least one member is a corporation.

3. All other terms of the lease/rental agreement shall remain in full force and effect.

LeFever Mattson Property Management will continue to manage the property.

PLEASE BE FURTHER ADVISED that all future notices, rents, demands, requests, or communications including but not limited to service of process shall be directed as follows:
LeFever Mattson Property Management
Attn: Alyse Zalmd
6359 Auburn Blvd, Suite B
Citrus Heights, CA 95621
Telephone No. (916) 723-5111

Pay Rent as follows: [X] Personal Check [X] Cashier's Check [X] Money Order

Third party checks are not permissible. Postdated checks are not permissible. Tenant(s) in receipt of a 3 Day Notice will be required to pay rent in the form of [X]Cashier's Check [X]Money Order until 3 Day Notice has been rectified.

All payments must be made "in advance" on or before the first (lst day of each calendar month, without offset or deductions of any kind, to the name of the Landlord or Landlord's Authorized Agent specified above, as follows:
Rent may be paid by either:
[X] Mail or Personal Delivery: The usual days and hours for personal delivery of the rent and other sums due are:
Days: Monday-Friday Hours: 8:30 a.m. - 5:00 p.m.
There is also a drop slot that is available all the time. Use of drop slot is at the residents own risk.

DATED: 11/25/2021 Celina Comfort
(Signature of Notice Preparer)

EXHIBIT 4

Original and First Amended UD Complaints, No. 25UD006079, with both attorney verifications and POS-010 (Dec. 13, 2025)

UD-100

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Pamela C. Jackson, Esq. SBN 87502 FIRM NAME: Pamela C. Jackson, Inc. STREET ADDRESS: 409 Boyd Street CITY: Vacaville STATE: CA ZIP CODE: 95688 TELEPHONE NO.: (707) 446-2333 FAX NO.: (707) 446-2393 EMAIL ADDRESS: jackson@pcjlawinc.com ATTORNEY FOR (name): Plaintiff STATE BAR NUMBER:	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California County of Sacramento 10/27/2025 By: H. Singh Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 301 Bicentennial Circle MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95826 BRANCH NAME: Carol Miller Justice Center	
PLAINTIFF: LEFEVR MATTSON PROPERTY MANAGEMENT DEFENDANT: MAJOR MOTT III, ERICA COOPER ☑ DOES 1 TO 10, inclusive	
COMPLAINT—UNLAWFUL DETAINER* ☑ COMPLAINT ☐ AMENDED COMPLAINT (Amendment Number):	CASE NUMBER: 25UD006079

Jurisdiction ***(check all that apply):***

☑ **ACTION IS A LIMITED CIVIL CASE (amount demanded does not exceed $35,000)**

Amount demanded ☐ **does not exceed $10,000** ☑ **exceeds $10,000**

☐ **ACTION IS AN UNLIMITED CIVIL CASE (amount demanded exceeds $35,000)**

☐ **ACTION IS RECLASSIFIED by this amended complaint or cross-complaint** ***(check all that apply):***

- ☐ **from unlawful detainer to general unlimited civil (possession not in issue).**
- ☐ **from unlawful detainer to general limited civil (possession not in issue).**
- ☐ **from limited to unlimited.**
- ☐ **from unlimited to limited.**

1. *PLAINTIFF (name each):*
   LEFEVR MATTSON PROPERTY MANAGEMENT

   alleges causes of action against DEFENDANT (name each):
   MAJOR MOTT III, ERICA COOPER

2. a. Plaintiff is
   (1) ☐ an individual over the age of 18 years.
   (2) ☐ a public agency.
   (3) ☐ other *(specify):*
   (4) ☐ a partnership. limited
   (5) ☑ a corporation.

   b. ☐ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of *(specify):*

3. a. *The venue is the court named above because defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):*
   5703 Orange Avenue
   Carmichael CA 95608
   Sacramento

   b. The premises in 3a are *(check one)*
   (1) ☑ within the city limits of *(name of city):* Sacramento
   (2) ☐ within the unincorporated area of *(name of county):*

   c. The premises in 3a were constructed in *(approximate year):*

4. Plaintiff's interest in the premises is ☑ as owner ☐ other *(specify):*

5. The true names and capacities of defendants sued as Does are unknown to plaintiff.

***NOTE:** Do not use this form for evictions after sale (Code Civ. Proc., § 1161a).*

UD-100

ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER: NAME: Pamela C. Jackson, Esq. SBN 87502 FIRM NAME: Pamela C. Jackson, Inc. STREET ADDRESS: 409 Boyd Street CITY: Vacaville STATE: CA ZIP CODE: 95688 TELEPHONE NO.: (707) 446-2333 FAX NO.: (707) 446-2393 EMAIL ADDRESS: jackson@pcjlawinc.com ATTORNEY FOR (name): Plaintiff	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California County of Sacramento 10/27/2025 By: H. Singh Deputy
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   (3) ☐ other *(specify):*
   (4) ☐ a partnership. limited
   (5) ☑ a corporation.

   b. ☐ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of *(specify):*

3. a. *The venue is the court named above because defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):*
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   Carmichael CA 95608
   Sacramento

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   (1) ☑ within the city limits of *(name of city):* Sacramento
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UD-100

ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER: NAME: Pamela C. Jackson, Esq. SBN 87502 FIRM NAME: Pamela C. Jackson, Inc. STREET ADDRESS: 409 Boyd Street CITY: Vacaville STATE: CA ZIP CODE: 95688 TELEPHONE NO.: (707) 446-2333 FAX NO.: (707) 446-2393 EMAIL ADDRESS: jackson@pcjlawinc.com ATTORNEY FOR (name): Plaintiff	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California County of Sacramento 10/27/2025 By: H. Singh Deputy
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   (4) ☐ a partnership. limited
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UD-100

ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER: NAME: Pamela C. Jackson, Esq. SBN 87502 FIRM NAME: Pamela C. Jackson, Inc. STREET ADDRESS: 409 Boyd Street CITY: Vacaville STATE: CA ZIP CODE: 95688 TELEPHONE NO.: (707) 446-2333 FAX NO.: (707) 446-2393 EMAIL ADDRESS: jackson@pcjlawinc.com ATTORNEY FOR (name): Plaintiff	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California County of Sacramento 10/27/2025 By: H. Singh Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 301 Bicentennial Circle MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95826 BRANCH NAME: Carol Miller Justice Center	
PLAINTIFF: LEFEVR MATTSON PROPERTY MANAGEMENT DEFENDANT: MAJOR MOTT III, ERICA COOPER ☑ DOES 1 TO 10, inclusive	
COMPLAINT—UNLAWFUL DETAINER* ☑ COMPLAINT ☐ AMENDED COMPLAINT (Amendment Number):	CASE NUMBER: 25UD006079

Jurisdiction ***(check all that apply):***

☑ **ACTION IS A LIMITED CIVIL CASE (amount demanded does not exceed $35,000)**

Amount demanded ☐ **does not exceed $10,000** ☑ **exceeds $10,000**

☐ **ACTION IS AN UNLIMITED CIVIL CASE (amount demanded exceeds $35,000)**

☐ **ACTION IS RECLASSIFIED by this amended complaint or cross-complaint** ***(check all that apply):***

- ☐ **from unlawful detainer to general unlimited civil (possession not in issue).**
- ☐ **from unlawful detainer to general limited civil (possession not in issue).**
- ☐ **from limited to unlimited.**
- ☐ **from unlimited to limited.**

1. *PLAINTIFF (name each):*
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   alleges causes of action against DEFENDANT (name each):
   MAJOR MOTT III, ERICA COOPER

2. a. Plaintiff is
   (1) ☐ an individual over the age of 18 years.
   (2) ☐ a public agency.
   (3) ☐ other *(specify):*
   (4) ☐ a partnership. limited
   (5) ☑ a corporation.

   b. ☐ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of *(specify):*

3. a. *The venue is the court named above because defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):*
   5703 Orange Avenue
   Carmichael CA 95608
   Sacramento

   b. The premises in 3a are *(check one)*
   (1) ☑ within the city limits of *(name of city):* Sacramento
   (2) ☐ within the unincorporated area of *(name of county):*

   c. The premises in 3a were constructed in *(approximate year):*

4. Plaintiff's interest in the premises is ☑ as owner ☐ other *(specify):*

5. The true names and capacities of defendants sued as Does are unknown to plaintiff.

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   alleges causes of action against DEFENDANT (name each):
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Jurisdiction ***(check all that apply):***

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Amount demanded ☐ **does not exceed $10,000** ☑ **exceeds $10,000**

☐ **ACTION IS AN UNLIMITED CIVIL CASE (amount demanded exceeds $35,000)**

☐ **ACTION IS RECLASSIFIED by this amended complaint or cross-complaint** ***(check all that apply):***

- ☐ **from unlawful detainer to general unlimited civil (possession not in issue).**
- ☐ **from unlawful detainer to general limited civil (possession not in issue).**
- ☐ **from limited to unlimited.**
- ☐ **from unlimited to limited.**

1. *PLAINTIFF (name each):*
   LEFEVR MATTSON PROPERTY MANAGEMENT

   alleges causes of action against DEFENDANT (name each):
   MAJOR MOTT III, ERICA COOPER

2. a. Plaintiff is
   (1) ☐ an individual over the age of 18 years.
   (2) ☐ a public agency.
   (3) ☐ other *(specify):*
   (4) ☐ a partnership. limited
   (5) ☑ a corporation.

   b. ☐ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of *(specify):*

3. a. *The venue is the court named above because defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):*
   5703 Orange Avenue
   Carmichael CA 95608
   Sacramento

   b. The premises in 3a are *(check one)*
   (1) ☑ within the city limits of *(name of city):* Sacramento
   (2) ☐ within the unincorporated area of *(name of county):*

   c. The premises in 3a were constructed in *(approximate year):*

4. Plaintiff's interest in the premises is ☑ as owner ☐ other *(specify):*

5. The true names and capacities of defendants sued as Does are unknown to plaintiff.

***NOTE:** Do not use this form for evictions after sale (Code Civ. Proc., § 1161a).*

UD-100

ATTORNEY OR PARTY WITHOUT ATTORNEY	STATE BAR NUMBER:	FOR COURT USE ONLY
NAME: Pamela C. Jackson, Esq. SBN 87502 FIRM NAME: Pamela C. Jackson, Inc. STREET ADDRESS: 409 Boyd Street CITY: Vacaville STATE: CA ZIP CODE: 95688 TELEPHONE NO.: (707) 446-2333 FAX NO.: (707) 446-2393 EMAIL ADDRESS: jackson@pcjlawinc.com ATTORNEY FOR (name): Plaintiff		ELECTRONICALLY FILED Superior Court of California County of Sacramento 10/27/2025 By: H. Singh Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 301 Bicentennial Circle MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95826 BRANCH NAME: Carol Miller Justice Center		
PLAINTIFF: LEFEVR MATTSON PROPERTY MANAGEMENT DEFENDANT: MAJOR MOTT III, ERICA COOPER ☑ DOES 1 TO 10, inclusive		
COMPLAINT—UNLAWFUL DETAINER* ☑ COMPLAINT ☐ AMENDED COMPLAINT (Amendment Number):		CASE NUMBER: 25UD006079

Jurisdiction ***(check all that apply):***

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   c. The premises in 3a were constructed in *(approximate year):*

4. Plaintiff's interest in the premises is ☑ as owner ☐ other *(specify):*

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ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER: NAME: Pamela C. Jackson, Esq. SBN 87502 FIRM NAME: Pamela C. Jackson, Inc. STREET ADDRESS: 409 Boyd Street CITY: Vacaville STATE: CA ZIP CODE: 95688 TELEPHONE NO.: (707) 446-2333 FAX NO.: (707) 446-2393 EMAIL ADDRESS: jackson@pcjlawinc.com ATTORNEY FOR (name): Plaintiff	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California County of Sacramento 10/27/2025 By: H. Singh Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 301 Bicentennial Circle MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95826 BRANCH NAME: Carol Miller Justice Center	
PLAINTIFF: LEFEVR MATTSON PROPERTY MANAGEMENT DEFENDANT: MAJOR MOTT III, ERICA COOPER ☑ DOES 1 TO 10, inclusive	
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   b. ☐ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of *(specify):*

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   (5) ☑ a corporation.

   b. ☐ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of *(specify):*

3. a. *The venue is the court named above because defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):*
   5703 Orange Avenue
   Carmichael CA 95608
   Sacramento

   b. The premises in 3a are *(check one)*
   (1) ☑ within the city limits of *(name of city):* Sacramento
   (2) ☐ within the unincorporated area of *(name of county):*

   c. The premises in 3a were constructed in *(approximate year):*

4. Plaintiff's interest in the premises is ☑ as owner ☐ other *(specify):*

5. The true names and capacities of defendants sued as Does are unknown to plaintiff.

***NOTE:** Do not use this form for evictions after sale (Code Civ. Proc., § 1161a).*

UD-100

ATTORNEY OR PARTY WITHOUT ATTORNEY	STATE BAR NUMBER:	FOR COURT USE ONLY
NAME: Pamela C. Jackson, Esq. SBN 87502 FIRM NAME: Pamela C. Jackson, Inc. STREET ADDRESS: 409 Boyd Street CITY: Vacaville STATE: CA ZIP CODE: 95688 TELEPHONE NO.: (707) 446-2333 FAX NO.: (707) 446-2393 EMAIL ADDRESS: jackson@pcjlawinc.com ATTORNEY FOR (name): Plaintiff		ELECTRONICALLY FILED Superior Court of California County of Sacramento 10/27/2025 By: H. Singh Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 301 Bicentennial Circle MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95826 BRANCH NAME: Carol Miller Justice Center		
PLAINTIFF: LEFEVR MATTSON PROPERTY MANAGEMENT DEFENDANT: MAJOR MOTT III, ERICA COOPER ☑ DOES 1 TO 10, inclusive		
COMPLAINT—UNLAWFUL DETAINER* ☑ COMPLAINT ☐ AMENDED COMPLAINT (Amendment Number):		CASE NUMBER: 25UD006079

Jurisdiction ***(check all that apply):***

☑ **ACTION IS A LIMITED CIVIL CASE (amount demanded does not exceed $35,000)**

Amount demanded ☐ **does not exceed $10,000** ☑ **exceeds $10,000**

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☐ **ACTION IS RECLASSIFIED by this amended complaint or cross-complaint** ***(check all that apply):***

- ☐ **from unlawful detainer to general unlimited civil (possession not in issue).**
- ☐ **from unlawful detainer to general limited civil (possession not in issue).**
- ☐ **from limited to unlimited.**
- ☐ **from unlimited to limited.**

1. *PLAINTIFF (name each):*
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   alleges causes of action against DEFENDANT (name each):
   MAJOR MOTT III, ERICA COOPER

2. a. Plaintiff is
   (1) ☐ an individual over the age of 18 years.
   (2) ☐ a public agency.
   (3) ☐ other *(specify):*
   (4) ☐ a partnership. limited
   (5) ☑ a corporation.

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 301 Bicentennial Circle MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95826 BRANCH NAME: Carol Miller Justice Center	
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   alleges causes of action against DEFENDANT (name each):
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   (3) ☐ other *(specify):*
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   (5) ☑ a corporation.

   b. ☐ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of *(specify):*

3. a. *The venue is the court named above because defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):*
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SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 301 Bicentennial Circle MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95826 BRANCH NAME: Carol Miller Justice Center		
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1. *PLAINTIFF (name each):*
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   alleges causes of action against DEFENDANT (name each):
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COMPLAINT—UNLAWFUL DETAINER*

☑ **COMPLAINT** ☐ **AMENDED COMPLAINT (Amendment Number):**

Jurisdiction ***(check all that apply):***

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UD-100

ATTORNEY OR PARTY WITHOUT ATTORNEY	STATE BAR NUMBER:	FOR COURT USE ONLY
NAME: Pamela C. Jackson, Esq. SBN 87502 FIRM NAME: Pamela C. Jackson, Inc. STREET ADDRESS: 409 Boyd Street CITY: Vacaville STATE: CA ZIP CODE: 95688 TELEPHONE NO.: (707) 446-2333 FAX NO.: (707) 446-2393 EMAIL ADDRESS: jackson@pcjlawinc.com ATTORNEY FOR (name): Plaintiff		ELECTRONICALLY FILED Superior Court of California County of Sacramento 10/27/2025 By: H. Singh Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 301 Bicentennial Circle MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95826 BRANCH NAME: Carol Miller Justice Center		
PLAINTIFF: LEFEVR MATTSON PROPERTY MANAGEMENT DEFENDANT: MAJOR MOTT III, ERICA COOPER ☑ DOES 1 TO 10, inclusive		
COMPLAINT—UNLAWFUL DETAINER* ☑ COMPLAINT ☐ AMENDED COMPLAINT (Amendment Number):		CASE NUMBER: 25UD006079

Jurisdiction ***(check all that apply):***

☑ **ACTION IS A LIMITED CIVIL CASE (amount demanded does not exceed $35,000)**

Amount demanded ☐ **does not exceed $10,000** ☑ **exceeds $10,000**

☐ **ACTION IS AN UNLIMITED CIVIL CASE (amount demanded exceeds $35,000)**

☐ **ACTION IS RECLASSIFIED by this amended complaint or cross-complaint** ***(check all that apply):***

- ☐ **from unlawful detainer to general unlimited civil (possession not in issue).**
- ☐ **from unlawful detainer to general limited civil (possession not in issue).**
- ☐ **from limited to unlimited.**
- ☐ **from unlimited to limited.**

1. *PLAINTIFF (name each):*
   LEFEVR MATTSON PROPERTY MANAGEMENT

   alleges causes of action against DEFENDANT (name each):
   MAJOR MOTT III, ERICA COOPER

2. a. Plaintiff is
   (1) ☐ an individual over the age of 18 years.
   (2) ☐ a public agency.
   (3) ☐ other *(specify):*
   (4) ☐ a partnership. limited
   (5) ☑ a corporation.

   b. ☐ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of *(specify):*

3. a. *The venue is the court named above because defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):*
   5703 Orange Avenue
   Carmichael CA 95608
   Sacramento

   b. The premises in 3a are *(check one)*
   (1) ☑ within the city limits of *(name of city):* Sacramento
   (2) ☐ within the unincorporated area of *(name of county):*

   c. The premises in 3a were constructed in *(approximate year):*

4. Plaintiff's interest in the premises is ☑ as owner ☐ other *(specify):*

5. The true names and capacities of defendants sued as Does are unknown to plaintiff.

***NOTE:** Do not use this form for evictions after sale (Code Civ. Proc., § 1161a).*

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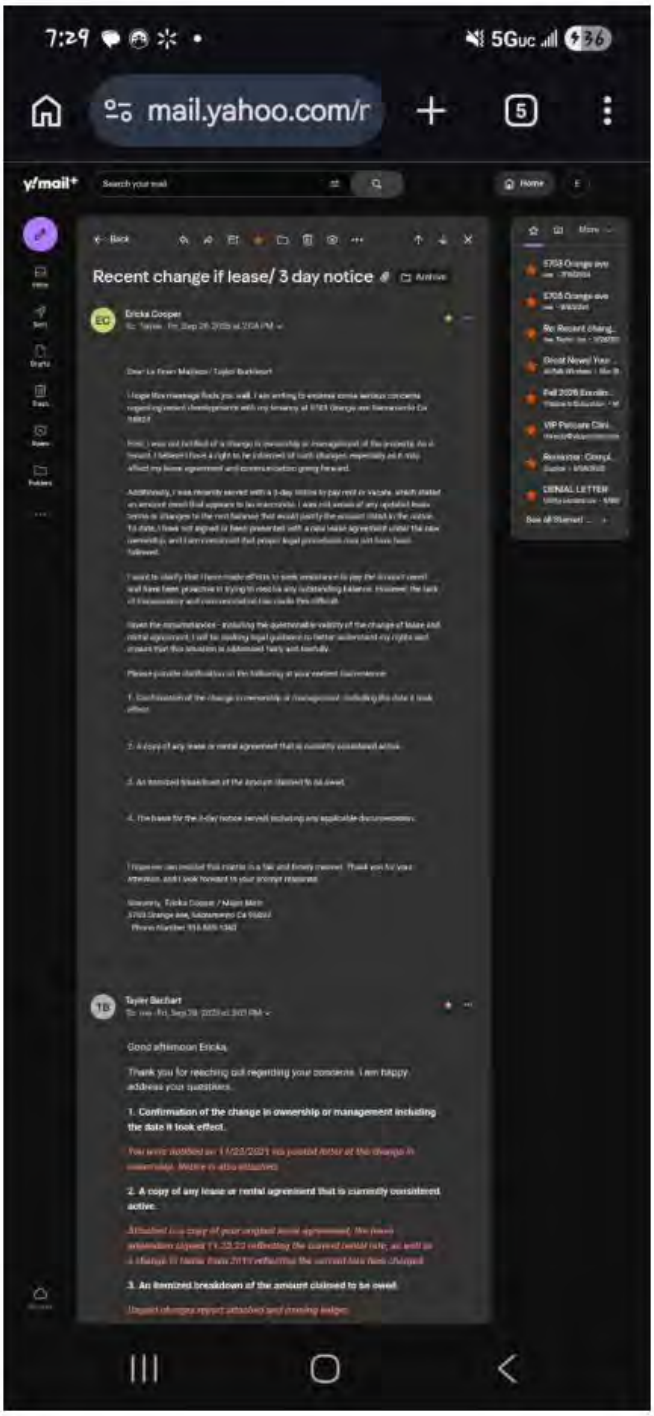
EXHIBIT 5

September 2025 demand set: Sept. 26, 2025 Bachart email transmitting the complete lease file; and the THREE simultaneous 3-day notices — Fox personal notice ($15,240; pay Fox in San Diego or 'Edwin' at 5705 Orange); LFPM notice ($15,240, Oct. 16); LFPM notice ($20,320, Sept. 29)

EXHIBIT G-1

September 26, 2025 email thread screenshot.

Source: User-provided Yahoo Mail screenshot.

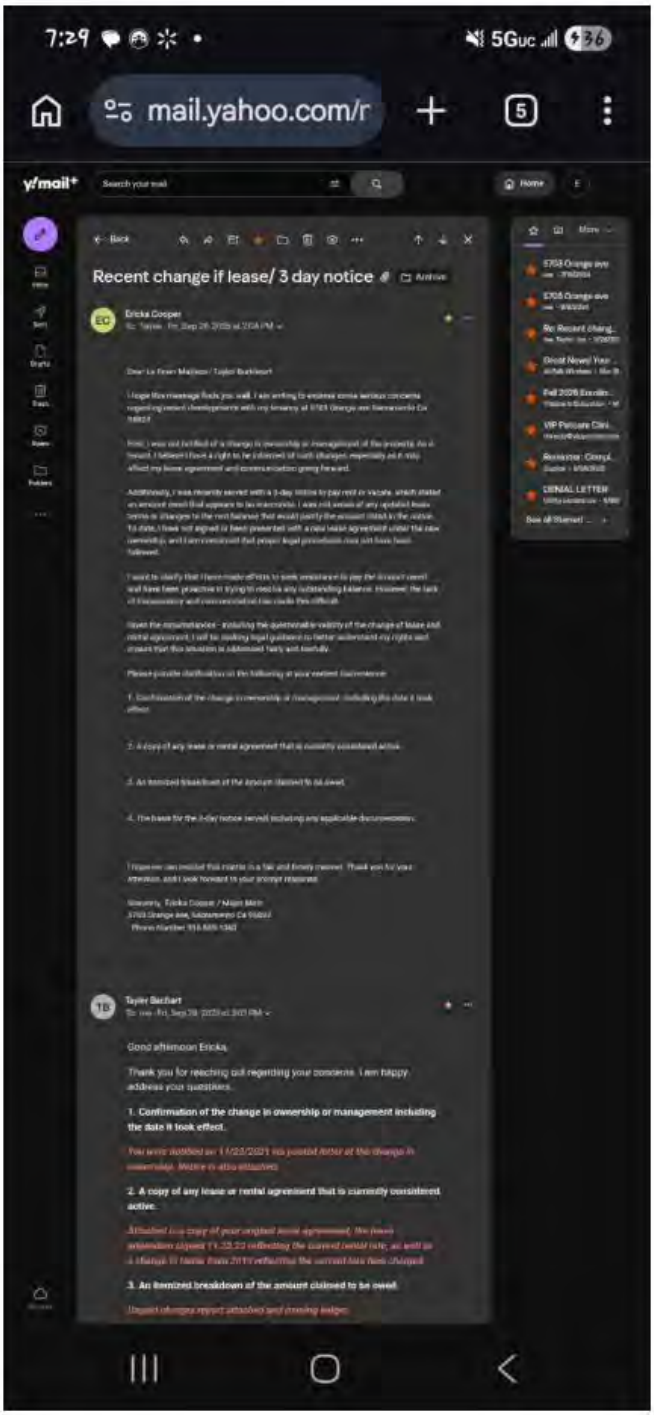


Binder p. 6 of 28

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Source: User-provided Yahoo Mail screenshot.



Binder p. 6 of 28

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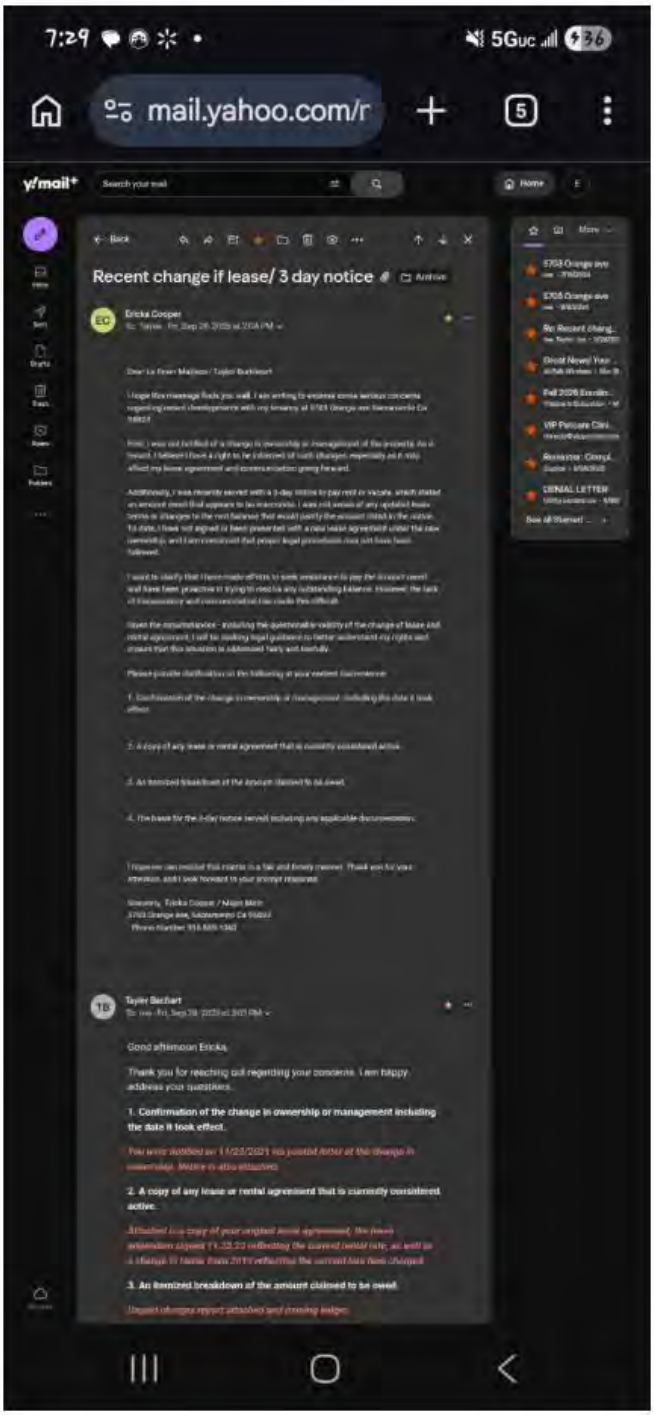
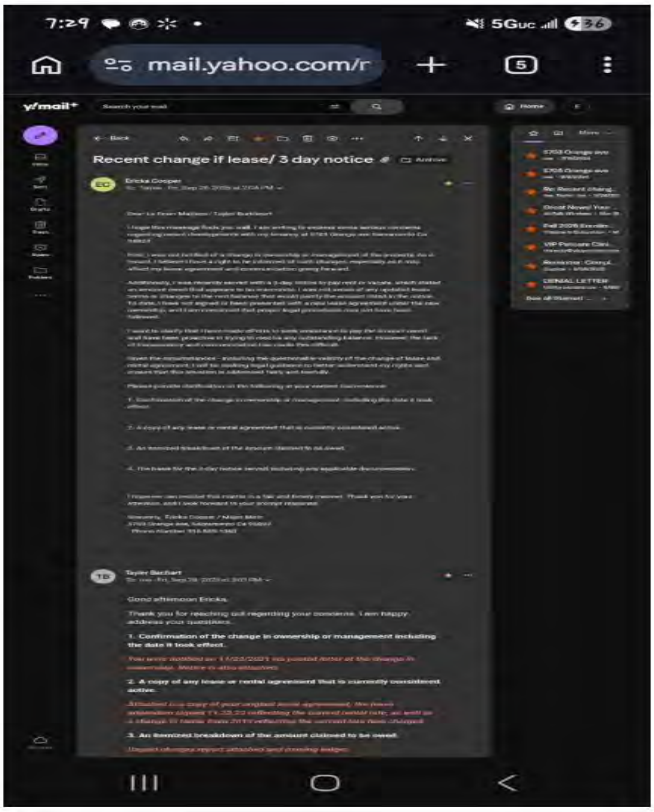


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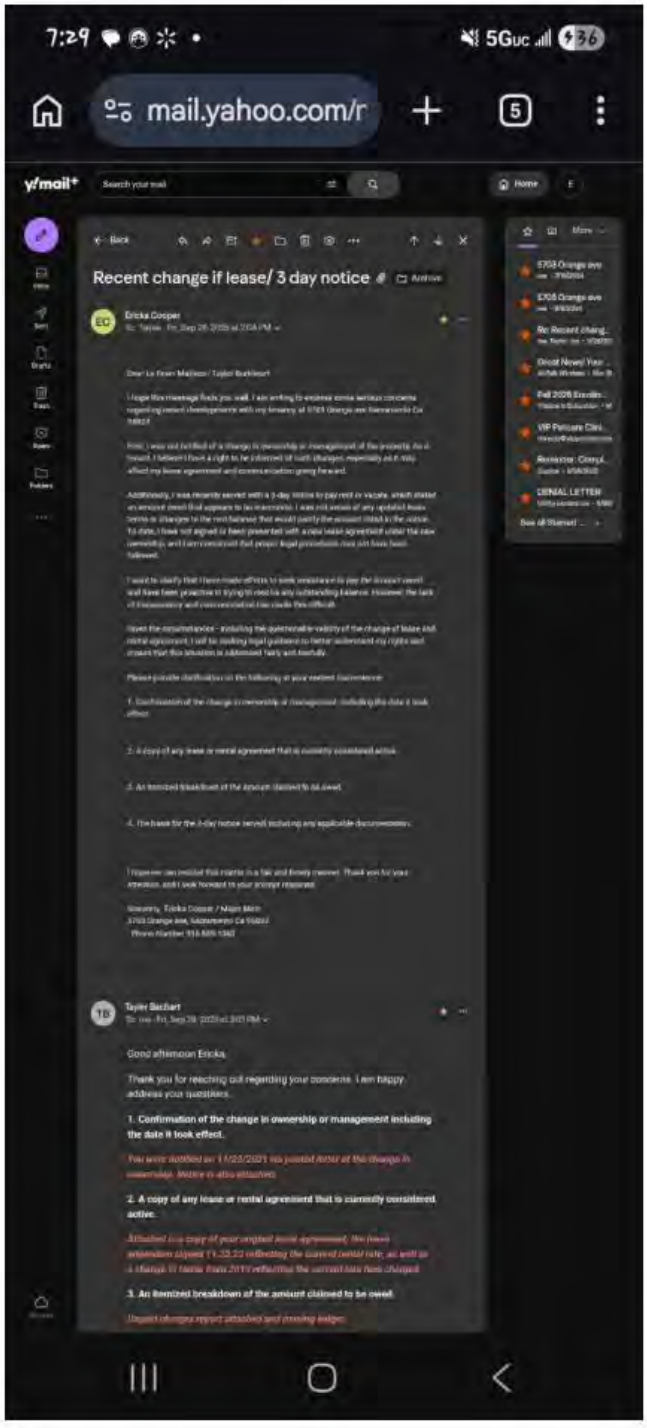


Binder p. 6 of 28

EXHIBIT G-1

September 26, 2025 email thread screenshot.

Source: User-provided Yahoo Mail screenshot.



Binder p. 6 of 28

EXHIBIT 6

Certified § 1161.2 Notice (Oct. 30, 2025) — Major Mott III only, 'Carmichael, CA 95608'

Choose sidebar display

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO

For Court Use Only

COURTHOUSE ADDRESS:
Carol Miller Justice Center
301 Bicentennial Circle, Sacramento, CA 95826

FILED
Superior Court of California
County of Sacramento
10/30/2025
H. Singh, Deputy

PLAINTIFF/PETITIONER:
LEFEVR MATTSON PROPERTY MANAGEMENT

DEFENDANT/RESPONDENT:
MAJOR MOTT, III et al

NOTICE OF FILING UNLAWFUL DETAINER COMPLAINT
(CCP § 1161.2)

CASE NUMBER:
25UD006079

MAJOR MOTT, III
5703 ORANGE AVENUE
CARMICHAEL, CA 95608

You are hereby notified that an Unlawful Detainer complaint (eviction action) has been filed against you. Access to the court file, index, register of action or other records will be delayed for 60 days except to a party, an attorney for one of the parties, or any other person who:

1. Provides to the clerk the names of at least one plaintiff and one defendant in the action and proves to the clerk the address, including any applicable apartment, unit or space number of the subject premises, or
2. Provides to the clerk the name of one of the parties in the action or the case number and can establish through proper identification he or she lives at the address described in the complaint, or
3. Shows good cause pursuant to an ex parte order.

Please Note: A Commissioner may sit as a temporary judge for this case

Do not call the court for legal advice. For legal advice or mediation services you may call:

- **Legal Services of Northern California**
  515 12th Street *(3 blocks from downtown courthouse)*
  Sacramento, CA 95814
  Phone: (916) 551-2150
  Website: www.lsnc.net
- **Sacramento County Bar Association**
  Phone: (916) 564-3780
  Website: www.sacbar.org
- **Unlawful Detainer Mediation Services**
  301 Bicentennial Circle, Room 320
  Sacramento, CA 95826
  Phone: (916) 875-7846
  Website: www.saccourt.ca.gov/ud/mediation.aspx

The State Bar of California certifies lawyer referral services in California and publishes a list of certified lawyer referral services organized by county. To locate a lawyer referral service in your county, go to the State Bar's internet web site at www.calbar.ca.gov or call (866) 442-2529.

EXHIBIT 7

USPS tracking and envelope, certified article 7020 3160 0000 2522 7913 — Notice Left Dec. 22, 2025; no delivery

EXHIBIT 7

[TO BE INSERTED BY FILER BEFORE FILING]

USPS tracking and envelope, certified article 7020 3160 0000 2522 7913 — Notice Left Dec. 22, 2025; no delivery

EXHIBIT 8

Certified Writ of Possession EJ-130 (Apr. 2, 2026) incl. p.3 claim-of-right advisement; Sheriff Notice to Vacate; Sheriff's Return on Writ (PRT-Cooper 0093) — execution 5/26/2026, silent as to any § 415.46 occupant service

EJ-130

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO:
NAME: Pamela C. Jackson, Esq. SBN 87502
FIRM NAME: Pamela C. Jackson, Inc.
STREET ADDRESS: 409 Boyd Street
CITY: Vacaville STATE: CA ZIP CODE: 95688
TELEPHONE NO.: (707) 446-2333 FAX NO.: (707) 446-2393
EMAIL ADDRESS: jackson@pcjlawinc.com
ATTORNEY FOR (name): Plaintiff
☑ ATTORNEY FOR ☑ ORIGINAL JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

FOR COURT USE ONLY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento
STREET ADDRESS: 301 Bicentennial Circle
MAILING ADDRESS:
CITY AND ZIP CODE: Sacramento, CA 95826
BRANCH NAME: Carol Miller Justice Center

PLAINTIFF/PETITIONER: LEFEVR MATTSON PROPERTY MANAGEMENT
DEFENDANT/RESPONDENT: MAJOR MOTT III et al

CASE NUMBER: 25UD006079

WRIT OF
☐ EXECUTION (Money Judgment)
☑ POSSESSION OF ☐ Personal Property ☑ Real Property
☐ SALE

☑ Limited Civil Case (including Small Claims)
☐ Unlimited Civil Case (including Family and Probate)

1. **To the Sheriff or Marshal of the County of:** Sacramento
You are directed to enforce the judgment described below with daily interest and your costs as provided by law.

2. **To any registered process server:** You are authorized to serve this writ only in accordance with CCP 699.080 or CCP 715.040.

3. (Name): LEFEVR MATTSON PROPERTY MANAGEMENT
is the ☑ original judgment creditor ☐ assignee of record whose address is shown on this form above the court's name.

4. **Judgment debtor** *(name, type of legal entity if not a natural person, and last known address):*
MAJOR MOTT III
5703 Orange Avenue
Sacramento CA 95823

☑ Additional judgment debtors on next page

5. **Judgment entered on** *(date):* 2/23/2026
(See type of judgment in item 22.)

6. ☐ Judgment renewed on *(dates):*

7. **Notice of sale** under this writ:
a. ☑ has not been requested.
b. ☐ has been requested *(see next page).*

8. ☐ Joint debtor information on next page.

9. ☑ Writ of Possession/Writ of Sale information on next page.

10. ☐ This writ is issued on a sister-state judgment.

For items 11–17, see form MC-012 and form MC-013-INFO.

11. Total judgment *(as entered or renewed)*	$	
12. Costs after judgment *(CCP 685.090)*	$	
13. Subtotal *(add 11 and 12)*	$	0.00
14. Credits to principal *(after credit to interest)*	$	
15. Principal remaining due *(subtract 14 from 13)*	$	0.00
16. Accrued interest remaining due per CCP 685.050(b) *(not on GC 6103.5 fees)*	$	
17. Fee for issuance of writ *(per GC 70626(a)(1))*	$	40.00
18. **Total amount due** *(add 15, 16, and 17)*	$	40.00

19. **Levying officer:**
a. Add daily interest from date of writ *(at the legal rate on 15) (not on GC 6103.5 fees)* $
b. Pay directly to court costs included in 11 and 17 *(GC 6103.5, 68637; CCP 699.520(j))* $

20. ☐ The amounts called for in items 11–19 are different for each debtor. These amounts are stated for each debtor on Attachment 20.

[SEAL]

Date: 04/02/2026 Clerk, by Kelly Sullivan electronically signed /s/ M. Uhl, Deputy

NOTICE TO PERSON SERVED: SEE PAGE 3 FOR IMPORTANT INFORMATION.

Case: 24-10545 Doc# 4588 Filed: 10/06/26 Entered: 10/06/26 17:58:55 Page 130 of 162

b. ☐ Possession of personal property.
☐ If delivery cannot be had, then for the value *(itemize in 25c)* specified in the judgment or supplemental order.
c. ☐ Sale of personal property.
d. ☐ Sale of real property.
e. The property is described ☑ below ☐ on Attachment 25e.
5703 Orange Avenue Sacramento CA 95823
Sacramento

NOTICE TO PERSON SERVED

RIT OF EXECUTION OR SALE. Your rights and duties are indicated on the accompanying *Notice of Levy* (form EJ-150).

RIT OF POSSESSION OF PERSONAL PROPERTY. If the levying officer is not able to take custody of the property, the levying cer will demand that you turn over the property. If custody is not obtained following demand, the judgment may be enforced as a ney judgment for the value of the property specified in the judgment or in a supplemental order.

RIT OF POSSESSION OF REAL PROPERTY. If the premises are not vacated within five days after the date of service on the upant or, if service is by posting, within five days after service on you, the levying officer will remove the occupants from the real perty and place the judgment creditor in possession of the property. Except for a mobile home, personal property remaining on the mises will be sold or otherwise disposed of in accordance with Code of Civil Procedure section 1174 unless you or the owner of the perly pays the judgment creditor the reasonable cost of storage and takes possession of the personal property not later than 15 s after the time the judgment creditor takes possession of the premises.

CEPTION IF RENTAL HOUSING UNIT WAS FORECLOSED. If the residential property that you are renting was sold in a closure, you have additional time before you must vacate the premises. If you have a lease for a fixed term, such as for a year, you remain in the property until the term is up. If you have a periodic lease or tenancy, such as from month-to-month, you may remain e property for 90 days after receiving a notice to quit. A blank form *Claim of Right to Possession and Notice of Hearing* (form 0) accompanies this writ. You may claim your right to remain on the property by filling it out and giving it to the sheriff or levying er.

CEPTION IF YOU WERE NOT SERVED WITH A FORM CALLED PREJUDGMENT CLAIM OF RIGHT TO POSSESSION. If you not named in the judgment for possession and you occupied the premises on the date on which the unlawful detainer case was , you may object to the enforcement of the judgment against you. You must complete the form *Claim of Right to Possession and ce of Hearing* (form CP10) and give it to the sheriff or levying officer. A blank form accompanies this writ. You have this right her or not the property you are renting was sold in a foreclosure.

GMENTS FOR PERSONAL DEBT. If you are the judgment debtor identified in item 4 on this form, and if item 22 on this form says *dgment is for personal debt*, the judgment creditor is required to verify your address before asking the levying officer to serve this *of Execution*. The judgment creditor must give the levying officer a completed copy of *Declaration of Address Verification* (form 015/EJ-135) and must file completed form WG-015/EJ-135 with the court within 10 business days of giving a copy of the form to evying officer. If the judgment creditor doesn't take these steps, you can ask the court to stay any wage garnishment order, bank unt levy, or other levy related to this *Writ of Execution*. You can use *Application for Stay of Levy or Garnishment* (form WG-017/ 37) to ask the court to stay the levy or garnishment until the address verification has been completed.

TO (Name and Address)	LEVYING OFFICER (Name and Address)
OCCUPANT 5703 Orange Avenue Sacramento, CA 95823	Sacramento County Sheriff's Office Sheriff's Civil Bureau 2969 Prospect Park Drive, Suite 200 Rancho Cordova, CA 95670 (916) 875-2665 Fax: (916) 875-2664 California Relay Service Number (800) 735-2929 TDD or 711
EMAIL	
NAME OF COURT, JUDICIAL DISTRICT or BRANCH COURT, IF ANY Sacramento Co. Superior Court-301UD 301 Bicentennial Circle Sacramento, CA 95826	
PLAINTIFF LeFevr Mattson Property Management	COURT CASE NO 25UD006079
DEFENDANT Major Mott III et al	
Notice to Vacate	LEVYING OFFICER FILE NO 2026011101

By virtue of the Writ of Execution for Possession/Real Property (eviction), issued out of the above court, you are hereby ordered to vacate the premises described on the writ.

Eviction Address:	5703 Orange Avenue Sacramento, CA 95823
Final notice is hereby given that possession of the property must be turned over to the landlord on or before:	**Wednesday, April 15, 2026 06:01 AM**

Should you fail to vacate the premises within the allotted time, I will immediately enforce the writ by removing you from the premises. All personal property upon the premises at the time will be turned over to the landlord, who must return said personal property to you upon your payment of the reasonable cost incurred by the landlord in storing the property from the date of eviction to the date of payment. If the property is stored on the landlord's premises, the reasonable cost of storage is the fair rental value of the space necessary for the time of storage. If you do not pay the reasonable storage costs and take possession within fifteen (15) days, the landlord may either sell your property at a public sale and keep from the proceeds of the sale the costs of storage and of the sale (1988 CIV), or, if the property is valued at less than $700.00, the landlord may dispose of your property or retain it for his own use. (715.010(b)(3), 1174 CCP)

If you claim a right of possession of the premises that accrued prior to the commencement of this action, or if you were in possession of the premises on the date of the filing of the action and you are not named on the writ, complete and file the attached Claim of Right of Possession form with this office. No claim of right to possession can be filed if the prejudgment claim of right to possession was served as indicated on the writ unless the eviction is the result of a foreclosure.

SHERIFF

Jim Cooper
Sheriff

EXHIBIT B

Writ of possession and Writ – Return (Satisfied) — No. 25UD006079

[INCLUDED BEHIND THIS TAB]

EXHIBIT B

Writ of possession and Writ – Return (Satisfied) — No. 25UD006079

[INCLUDED BEHIND THIS TAB]

EXHIBIT B

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EXHIBIT B

Writ of possession and Writ – Return (Satisfied) — No. 25UD006079

[INCLUDED BEHIND THIS TAB]

EXHIBIT B

Writ of possession and Writ – Return (Satisfied) — No. 25UD006079

[INCLUDED BEHIND THIS TAB]

EXHIBIT 9

Court certificates of mailing (Apr. 14–15, 2026, 'Carmichael, CA 95608');
Order on Fee Waiver; Apr. 14, 2026 conditional-stay order (Hon. Bickley)

SUPERIOR COURT OF CALIFORNIA COUNTY OF SACRAMENTO	Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Carol Miller Justice Center 301 Bicentennial Circle, Sacramento, CA 95826	
PLAINTIFF/PETITIONER: LEFEVR MATTSON PROPERTY MANAGEMENT	
DEFENDANT/RESPONDENT: MAJOR MOTT, III et al	
CERTIFICATE OF MAILING	CASE NUMBER: 25UD006079

I, the below-named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States mail at the courthouse in Sacramento, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

ERICA COOPER
5703 Orange Avenue
Carmichael, CA 95608

Dated: 04/14/2026

By: */s/ E. Rivera-Garcia*
E. Rivera-Garcia, Deputy Clerk

CERTIFICATE OF MAILING

SUPERIOR COURT OF CALIFORNIA COUNTY OF SACRAMENTO	Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Carol Miller Justice Center 301 Bicentennial Circle, Sacramento, CA 95826	
PLAINTIFF/PETITIONER: LEFEVR MATTSON PROPERTY MANAGEMENT	
DEFENDANT/RESPONDENT: MAJOR MOTT, III et al	
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ERICA COOPER
5703 Orange Avenue
Carmichael, CA 95608

Dated: 04/14/2026

By: */s/ E. Rivera-Garcia*
E. Rivera-Garcia, Deputy Clerk

CERTIFICATE OF MAILING

EXHIBIT 10

Defendants' production: May 26, 2026 10:21 a.m. locksmith receipt to Brenda Comfort (PRT-0089); June 14, 2026 $5,500 invoice 'per Brenda'; mileage ('Tenant Lockout')

EXHIBIT 10

[TO BE INSERTED BY FILER BEFORE FILING]

Insert manually: Cooper_v__LeFever_Defs_Initial_Discl_docs.pdf

EXHIBIT 11

Written preservation demand, June 1, 2026

EXHIBIT 11

[TO BE INSERTED BY FILER BEFORE FILING]

Written preservation demand, June 1, 2026

EXHIBIT 12

Dated photographs, Aug. 14, 2026 — premises vacant, boarded, deteriorating; appliances outdoors


5703


703


5703


5703

EXHIBIT E

JACOB BOLDEN and AMARRA MOTT
6128 Elder Creek Road (mailing address)
Sacramento, California 95824
Telephone: (916) 585-1060
Email: jacobabolden@gmail.com
Plaintiffs In Propria Persona

ELECTRONICALLY FILED
Superior Court of California
County of Sacramento
08/27/2026
By: S. Cade Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

JACOB BOLDEN and AMARRA MOTT, Plaintiffs, v. **HOME TAX SERVICE OF AMERICA, INC. dba LEFEVER MATTSON PROPERTY MANAGEMENT; KRISTINA MELICK a/k/a KRISTINA FOX; and DOES 1 through 50, inclusive,** Defendants.	**Case No. 26CV019064** **PLAINTIFFS' RESPONSE AND OBJECTION TO DEFENDANT HOME TAX SERVICE OF AMERICA, INC.'S NOTICE OF STAY OF PROCEEDINGS (CM-180); REQUEST FOR DETERMINATION THAT NO STAY HAS BEEN ESTABLISHED** Judge: Hon. Richard C. Miadich Department: 8C No Hearing Date Set

RESPONSE AND OBJECTION

Plaintiffs Jacob Bolden and Amarra Mott respond to Defendant Home Tax Service of America, Inc.'s August 21, 2026 Notice of Stay of Proceedings (CM-180). This response is limited to whether the documents Defendant filed establish an operative stay of this action.

The CM-180 does not identify an automatic bankruptcy stay and does not identify a separate federal-court or higher-California-court order staying Sacramento Superior Court Case No.

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26CV019064. Defendant checked box 3.e, "Other," and identified the asserted basis as: "exculpation clause at para. 22 of Order Confirming Third Amended Chapter 11 Plan (attached)." Exhibit A.

Plaintiffs submit the underlying bankruptcy and state-court records themselves. Those records show the Confirmation Order's notice-and-objection procedure, the May 13 amendment affecting Unit 5703, the actual service records, the May 14 Effective Date notice, the May 26 enforcement records, and the August 13 Bankruptcy Court transcript. Plaintiffs do not rely on any undecided motion as proof of these facts.

FACTUAL RECORD

1. On August 21, 2026, Home Tax filed CM-180. It states that the claimed stay applies to Home Tax Service of America, Inc. dba LeFever Mattson Property Management, identified on the form as the Consolidated Debtor. The form leaves unchecked the boxes for an automatic stay and for an order of a federal court or higher California court, and checks only "Other," citing Paragraph 22 of the Confirmation Order. (Ex. A.)

2. Paragraph 10 of the Confirmation Order provides that when the Schedule of Assumed Agreements is amended to delete an agreement or provide for rejection or other disposition, affected counterparties are to receive notice. It further provides fourteen calendar days after the Effective Date to file an objection and states that, if the parties cannot consensually resolve the objection, a hearing will be held in the Bankruptcy Court. (Ex. B.)

3. Paragraph 22 of the Confirmation Order is the injunction provision Defendant cited on the CM-180. It permanently enjoins actions on claims released or exculpated under the Plan and contains a gatekeeping provision concerning actions against an Exculpated Party that are related to or connected with the Chapter 11 Cases. (Ex. B.)

4. Docket No. 4163, filed April 7, 2026, removed the separate Cooper entry while retaining a Unit 5703 entry under Mott. Docket No. 4332, filed May 13, 2026, then removed the remaining Unit 5703 entry. Docket No. 4332 expressly states that counterparties to Removed Agreements have fourteen calendar days after the Effective Date to file a Contract Objection and that unresolved objections will be set for hearing. (Ex. C.)

5. The Effective Date occurred May 14, 2026. Fourteen calendar days after May 14 was May 28, 2026. (Exs. B, E.)

6. The service records submitted as Exhibit D show the persons and addresses actually listed for service in connection with the April amendment and supplemental service. The supplemental service list identifies Major Mott III. Plaintiffs submit those service records for the Court to review directly. (Ex. D.)

7. The Notice of Effective Date identifies May 14, 2026 as the Effective Date and states the deadlines described in that notice. Plaintiffs submit the notice itself so the Court can compare what it disclosed with Paragraph 10 and Docket No. 4332. (Ex. E.)

8. The Sheriff's Return on Writ of Possession states that Plaintiff in the unlawful-detainer action was placed in quiet and peaceful possession of 5703 Orange Avenue on May 26, 2026 and that the writ was returned satisfied as to possession. A May 26 receipt sent to Brenda Comfort at 10:21 a.m. shows a $439 payment to Always on the Road LLC. (Ex. F.)

9. At the August 13, 2026 bankruptcy hearing, Judge Hannah L. Blumenstiel described relief sought in Cooper's adversary proceeding as including whether "state court enforcement must be stayed, conditioned, or voided," and stated that she had denied the request for a hearing on shortened time on a TRO application on May 7, 2026. (Ex. G.)

10. At the same August 13 hearing, counsel for the Consolidated Debtor and Plan Recovery Trustee told the Bankruptcy Court that an adult daughter and another person had filed a state-court action relating to the eviction and asserted that the state action violated the Plan's exculpation provisions. Counsel said, "So we may be before you if those two plaintiffs don't dismiss their case." Judge Blumenstiel responded: "Why would that be before me if it's pending a state court unless you plan to remove that state court action?" Counsel then identified a possible motion for contempt for an alleged Plan violation. (Ex. G.)

11. At the August 13 hearing, Judge Blumenstiel also set September 10, 2026 as the deadline for Ericka Cooper to file an amended adversary complaint, and stated that failure to comply could result in an order to show cause regarding dismissal of that adversary proceeding. (Ex. G.)

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12. The Sacramento Superior Court Notice of Confirmation of Electronic Filing states that the Court received Plaintiffs' amended complaint and summons on August 21, 2026 at 12:28 a.m. and generated its acceptance notice on August 24, 2026, listing both the Summons and Amended Complaint as accepted. The summons bears the Court's August 24, 2026 electronic filing stamp and names Home Tax Service of America, Inc. dba LeFever Mattson Property Management, Kristina Melick a/k/a Kristina Fox, and Does 1-50. (Ex. H.)

ARGUMENT

I. RULE 3.650 REQUIRES THE FILER TO IDENTIFY AN EXISTING STAY.

California Rule of Court 3.650(a) provides that a party who requested or caused a stay must immediately serve and file a notice of the stay and attach "a copy of the order or other document showing that the proceeding is stayed." A CM-180 reports an asserted existing stay; it does not itself create one.

Home Tax therefore must rely on the document it identified. Its CM-180 does not invoke the automatic-stay box and does not identify a separate federal stay order. The stated basis is Paragraph 22 of the Confirmation Order. (Ex. A.)

II. THE ATTACHED FEDERAL RECORD DOES NOT CONTAIN AN ORDER SPECIFICALLY STAYING CASE NO. 26CV019064.

The submitted Confirmation Order contains Paragraph 22, but the materials Defendant filed do not contain an order naming Sacramento Superior Court Case No. 26CV019064 and directing that this action be stayed. The distinction is shown by Defendant's own CM-180: the box for an order of a federal court or higher California court is not checked. (Ex. A.)

III. THE BANKRUPTCY COURT TWICE DECLINED TO OPPOSE OR DISPLACE THE STATE-COURT PROCEEDINGS.

First, on May 7, 2026, Judge Blumenstiel denied the request for expedited TRO relief. At the August 13 hearing, she expressly described the requested relief as including whether state-court enforcement must be "stayed, conditioned, or voided" and confirmed the May 7 denial. (Ex. G.)

Second, on August 13, counsel expressly raised the separate state action and asserted a Plan violation. Judge Blumenstiel asked: "Why would that be before me if it's pending a state court unless

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you plan to remove that state court action?" Counsel responded by identifying a possible future contempt motion. The transcript does not contain an order declaring this Sacramento action stayed. (Ex. G.)

Plaintiffs state this point as the record shows it: twice the Bankruptcy Court declined to oppose or displace the state-court proceedings. Plaintiffs do not contend in this filing that the Bankruptcy Court ruled that it lacked jurisdiction.

IV. DEFENDANT'S OWN CONFIRMATION ORDER CONTAINS A NOTICE, OBJECTION, AND HEARING PROCEDURE.

Paragraph 10 required notice to counterparties affected by an amendment to the Schedule of Assumed Agreements, provided fourteen calendar days after the Effective Date to object, and stated that an unresolved objection would be heard by the Bankruptcy Court. Docket No. 4332 repeated a fourteen-day Contract Objection period for Removed Agreements and stated that unresolved objections would be set for hearing. (Exs. B, C.)

The Effective Date was May 14, 2026, making May 28 the fourteenth calendar day. The Sheriff's Return shows that possession was enforced on May 26, two days before that period expired. (Exs. E, F.)

V. THE UNDERLYING SERVICE RECORDS, NOT AN UNDECIDED MOTION, SHOW WHAT NOTICE WAS ACTUALLY PROVIDED.

Plaintiffs do not ask this Court to accept a characterization from a pending bankruptcy motion. Exhibits C through E are the underlying bankruptcy notices and service records. They show what was filed, who was listed for service, what objection language appeared in Docket No. 4332, and what the Effective Date notice itself disclosed.

Those documents are relevant because Defendant relies on the Confirmation Order as an existing restraint against this state action. The same Confirmation Order contains the procedural steps governing amendments to assumed agreements. The Court can evaluate the chronology from the documents themselves without deciding any pending bankruptcy motion. (Exs. B-E.)

VI. THE AUGUST 24 STATE-COURT ACCEPTANCE IS CONSISTENT WITH THE ABSENCE OF A CASE-SPECIFIC STAY ORDER IN THE MATERIALS PRESENTED.

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The Court's filing confirmation shows the amended complaint and summons accepted on August 24, and the issued summons bears an August 24 electronic filing stamp naming Home Tax among the defendants. (Ex. H.) Plaintiffs do not characterize those clerk records as a merits ruling on Paragraph 22. They submit them for the limited fact that the state-court record continued to process the action after the August 21 CM-180.

REQUEST FOR RELIEF

1. Determine that Defendant's August 21, 2026 CM-180 and attached materials do not establish an operative stay of Sacramento Superior Court Case No. 26CV019064;

2. Direct that proceedings continue unless and until a valid order or other document establishing a stay of this action is presented and recognized by this Court; and

3. Grant such further relief as the Court deems proper.

Dated: August 27th, 2026

JACOB BOLDEN, Plaintiff In Propria Persona

Dated: August 27th, 2026

AMARRA MOTT, Plaintiff In Propria Persona

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EXHIBIT F

AMARRA MOTT
6128 Elder Creek Road (mailing address)
Sacramento, California 95824
Telephone: (916) 585-1060
Plaintiff In Propria Persona

FILED
Superior Court of California
County of Sacramento
09/22/2026
D. Johnson-Mellado, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

JACOB BOLDEN and AMARRA MOTT, Plaintiffs, v. HOME TAX SERVICE OF AMERICA, INC. dba LEFEVER MATTSON PROPERTY MANAGEMENT; KRISTINA MELICK a/k/a KRISTINA FOX; and DOES 1-50, inclusive, Defendants.	**Case No. 26CV019064** ~~**[PROPOSED]**~~ **ORDER GRANTING APPLICATION OF PLAINTIFF AMARRA MOTT FOR COURT APPROVAL TO RECORD NOTICE OF PENDENCY OF ACTION** [Code Civ. Proc., § 405.21] Assigned: Hon. Richard C. Miadich Dept. 8C

The Court has considered the Application of Plaintiff Amarra Mott for Court Approval to Record Notice of Pendency of Action, the Memorandum of Points and Authorities, the Declaration of Amarra Mott and exhibits, the operative First Amended Verified

Electronically Received 08/27/2026 08:25 PM

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Complaint, and the record. GOOD CAUSE APPEARING, IT IS ORDERED:

1. The Court finds that the operative First Amended Verified Complaint includes a "real property claim" within the meaning of Code of Civil Procedure section 405.4, in that it pleads claims which, if meritorious, would affect Plaintiff Amarra Mott's asserted right to possession of the specific real property commonly known as 5701/5703 Orange Avenue, Sacramento, California 95823-3425, APN 050-0411-002-0000.

2. Pursuant to Code of Civil Procedure section 405.21, the Court APPROVES Plaintiff Amarra Mott's Notice of Pendency of Action, in the form attached to the Application, for recordation.

3. Before recordation, Plaintiff shall serve the approved Notice as required by Code of Civil Procedure section 405.22. Immediately following recordation, Plaintiff shall file a copy of the recorded Notice with this Court, together with proof of the service required by section 405.22.

IT IS SO ORDERED.

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Dated: 09/22/2026

HON. RICHARD C. MIADICH

JUDGE OF THE SUPERIOR COURT

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