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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SANTA ROSA DIVISION

In re LEFEVER MATTSON, Consolidated Debtor,	Case No. 24-10545 HLB (Substantively Consolidated) Chapter 11 **NOTICE OF HEARING ON PLAN RECOVERY TRUSTEE'S MOTION FOR ENTRY OF AN ORDER ENFORCING PLAN INJUNCTION PROVISIONS AND DIRECTING (1) DISMISSAL OF STATE COURT ACTION, AND (2) WITHDRAWAL OF LIS PENDENS** **Hearing:** Date: November 5, 2026 Time: 2:00 p.m. (Pacific Time) Place: *Via Zoom or In Person* United States Bankruptcy Court 450 Golden Gate Ave, 16th Floor Courtroom 19 San Francisco, CA 94102 **Objection Deadline: October 22, 2026**

TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, AMARRA MOTT, JAMES BOLDEN, AND OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that on April 23, 2026, the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the "Bankruptcy Court") entered an order [Docket No. 4225] (the "Confirmation Order") confirming the *Third Amended Chapter 11 Plan of Liquidation, as Modified* [Docket No. 4151] (the "Plan") in the chapter 11 case of the above-captioned debtor (the "Consolidated Debtor"). Pursuant to the Plan, Michael Goldberg in his capacity as Plan Recovery Trustee, has the authority and right to appear on behalf of the LFM Plan Recovery Trust and the Consolidated Debtor to exercise such powers deemed necessary and proper to implement the Plan. *See* Plan, §§ 5.2.2, 5.3.6 – 5.3.8.

PLEASE TAKE FURTHER NOTICE that on October 6, 2026, the Plan Recovery Trustee filed the *Plan Recovery Trustee's Motion for Entry of an Order Enforcing Plan Injunction Provisions and Directing (1) Dismissal of State Court Action, and (2) Withdrawal of Lis Pendens* [Docket No. 4587] (the "Motion") seeking entry of an order enforcing the terms of the Plan and directing dismissal of the state court action entitled, Bolden, et al. v. Melick, et al., Sacramento Superior Court, Case No. 26-CV-019064 ("Bolden Action") and withdrawal of any recorded list pendens against real property at 5701/5703 Orange Avenue, Sacramento, California 95823.

PLEASE TAKE FURTHER NOTICE that a hearing has been scheduled for **November 5, 2026 at 2:00 p.m.** (Pacific Time) (the "Hearing") before the Honorable Hannah L. Blumenstiel, United States Bankruptcy Judge, to consider the Motion.

PLEASE TAKE FURTHER NOTICE that the pursuant to the *Procedures for Noticing and Conducting Hearings in the San Francisco Division of the United States Bankruptcy Court for the Northern District of California (effective May 9, 2025)*, you may participate in this hearing in-person or by Zoom. To attend in-person, you should arrive at Courtroom 19, 450 Golden Gate Avenue, 16th Floor, San Francisco, CA no later than the time set forth in this notice. To attend via Zoom, please consult the Bankruptcy Court's website, which provides information explaining how to arrange an appearance at a video hearing. If you have questions about how to participate in a hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Bankruptcy Local Rule 9014-1(c), any response to the Motion must be in writing and filed with the Bankruptcy Court and served on counsel for the Plan Recovery Trustee at the above-referenced address no later than **11:59 p.m. (Pacific Time) on October 22, 2026**.

PLEASE TAKE FURTHER NOTICE that a copy of the Motion, and any related pleading, is available (i) at no cost at the claims agent's website at: https://veritaglobal.net/lm; (ii) on PACER for a fee, or (iii) by contacting Brooke Wilson at (415) 263-7000, or by email at bwilson@pszjlaw.com.

Dated: October 6, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ John D. Fiero
John D. Fiero

Counsel to Michael Goldberg, in his capacity as the Plan Recovery Trustee