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Attorneys for Michael I. Goldberg, as Trustee of the LFM Plan Recovery Trust

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SANTA ROSA DIVISION

In re:

LEFEVER MATTSON,

Consolidated Debtor.

Case No. 24-10545 (HLB)

(Substantively Consolidated)

Chapter 11

MOTION FOR ENTRY OF AN ORDER EXTENDING DEADLINE FOR TRUSTEE OF THE LFM PLAN RECOVERY TRUST TO RESOLVE PROOFS OF INTEREST AND OBJECT TO CLAIMS

Date: November 5, 2026
Time: 10:00 a.m. (Pacific Time)
Place: **In-Person or Zoom Appearances**
United States Bankruptcy Court
450 Golden Gate Avenue
16th Floor, Courtroom 19
San Francisco, CA 94102

Case: 24-10545 Doc# 4594 Filed: 10/15/26 Entered: 10/1 5910545261015000000000001

Michael I. Goldberg (the "Trustee"),[1] solely in his capacity as Trustee of the LFM Plan Recovery Trust, formed pursuant to the *Third Amended Chapter 11 Plan of Liquidation, as Modified* [Dkt. No. 4151] (the "Plan") in the above-captioned chapter 11 case (the "Chapter 11 Case") of consolidated debtor LeFever Mattson (the "Consolidated Debtor"),[2] hereby moves (the "Motion"), in accordance with Section 8.2 of the Plan, sections 105(a) and 1142 of title 11 of the United States Code (the "Bankruptcy Code"), and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), extending the deadline established under the Plan for the Trustee to object to Claims by one hundred eighty (180) days, through and including May 10, 2027,[3] without prejudice to the Trustee's right to seek additional extensions thereof. In support of the Motion, the Trustee submits the Declaration of Michael I. Goldberg, filed concurrently herewith.

I. PRELIMINARY STATEMENT

More than 1,900 proofs of claim (the "Proofs of Claim") and 800 proofs of interest (the "Proofs of Interest") have been filed in this Chapter 11 Case. The Trustee and his advisors have been diligently working to reconcile the Proofs of Claims and Proofs of Interest, as well as scheduled interests and claims, in accordance with the Plan to enable a distribution to creditors as soon as possible. In the approximately five months since the Effective Date, the Trustee has

[1] On May 14, 2026 (the "Effective Date"), the Plan, confirmed by the Court on April 23, 2026 [Dkt. No. 4225] (the "Confirmation Order"), became effective. *See* Dkt. No. 4335. As of the Effective Date, the Trustee retains all rights to institute, commence, file, pursue, prosecute, enforce, abandon, settle, compromise, release, waive, dismiss, or withdraw, as appropriate, any and all Causes of Action[.]" Confirmation Order, ¶ 13.

[2] On March 6, 2026, the Court entered the *Order Substantively Consolidating Debtors and KSMP Investment Entities and Granting Related Relief* [Dkt. No. 3914] (the "Substantive Consolidation Order"), which substantively consolidated the estates of LeFever Mattson, a California corporation and its affiliated debtors (the "LFM Debtors"), KS Mattson Partners, LP ("KSMP," and together with the LFM Debtors, the "Debtors") and three KSMP-affiliated entities (Perris Freeway Plaza, LP, Specialty Properties Partners, LP, and Treehouse Investments, LP), forming the "Consolidated Debtor."

[3] 180 days from the Current Objection Deadline (as defined below) is Sunday, May 9, 2027. The next day that is not a Saturday, Sunday, or legal holiday is May 10, 2027. *See* Fed. R. Bankr. P. 9006.

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resolved more than 2,000 Proofs of Interest, Proofs of Claim asserted by investors, and scheduled interests (collectively, the "Investor Claims") to allow claims for more than 570 investors, and the Trustee has expunged, reduced through settlement, or otherwise resolved approximately 250 Proofs of Claims and scheduled claims (collectively, the "Non-Investor Claims") asserting approximately $65 million in claims. Much of this reconciliation process has been without contest before this Court, and the Trustee hopes and intends to continue in that fashion. Notwithstanding this progress, approximately 150 Investor Claims (the "Remaining Investor Claims") and 1,000 Non-Investor Claims (the "Remaining Non-Investor Claims") remain unresolved.

II. JURISDICTION AND VENUE

The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

III. BACKGROUND

A. General Background

On August 6, 2024, September 12, 2024, and October 2, 2024 (the "LFM Petition Dates"),[4] the LFM Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, commencing their jointly administered bankruptcy cases. On November 22, 2024 (the "KSMP Petition Date"), Debtor KSMP became subject to an involuntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2025, the Court entered the *Stipulated Order for Relief in an Involuntary Case* and subsequently appointed Robbin L. Itkin as the Responsible Individual in the KSMP chapter 11 case, effective as of June 16, 2025. On March 6, 2026, the Court entered the Substantive Consolidation Order, which substantively consolidated the estates of the LFM

[4] LFM Debtor, Windscape Apartments, LLC filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code on August 6, 2024. LFM Debtors Pinewood Condominiums, LP and Ponderosa Pines, LP each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code on October 2, 2024. The other fifty-eight LFM Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code on September 12, 2024.

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Debtors, KSMP, and the KSMP Investment Entities. On April 23, 2026, the Court entered an order [Docket No. 4225] (the "Confirmation Order") confirming the Plan.

B. Schedules, Bar Date Orders, and Claim Procedures

On November 15, 2024, the LFM Debtors filed their schedules of assets and liabilities, statements of financial affairs, and list of equity security holders [Docket Nos. 292-353], and on September 9, 2025, the LFM Debtors filed amended schedules of assets and liabilities and certain statements of financial affairs [Docket Nos. 2251-2291, 2293-2305] (collectively, the "LFM Schedules and Statements"). On December 14, 2024, the Court established February 14, 2025 (the "LFM Bar Date") as the last day for (a) all investors to file proofs of interest in the LFM Debtors arising before the LFM Petition Dates and (b) all creditors to file proofs of claim against the LFM Debtors arising before the LFM Petition Dates. Docket No. 459. The deadline for governmental units to file proofs of claim against the LFM Debtors arising before the LFM Petition Dates remained 180 days after the applicable LFM Petition Date. *Id.*

On August 8, 2025, KSMP filed its schedules of assets and liabilities, statements of financial affairs, and list of equity security holders [Docket Nos. 1980-1982], and on December 9, 2025, KSMP filed amended schedules of assets and liabilities and statements of financial affairs [Docket Nos. 3069 and 3070] (collectively, the "KSMP Schedules and Statements" and together with the LFM Schedules and Statements, the "Schedules and Statements"). On August 28, 2025, the Court established October 3, 2025 (the "KSMP Bar Date") as the last day for all creditors (other than governmental units) to file proofs of claim against KSMP arising before the KSMP Petition Date, and established December 8, 2025 as the last day for governmental units to file proofs of claim against KSMP arising before the KSMP Petition Date. Docket No. 2184.

On May 21, 2026, the Court entered the *Order Approving (A) Procedures for Filing Omnibus Objections to Non-Investor Claims, (B) Procedures to Resolve Investor Claims, and (C) the Form and Manner of Notice* [Docket No. 4358] (the "Procedures Order"), which, *inter alia*, established procedures for the consensual resolution of Investor Claims and omnibus objections to Non-Investor Claims.

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C. Claims Reconciliation Process

According to the official register of claims and interest maintained by Kurtzman Carson Consultants, LLC dba Verita Global ("Verita" or "Claims Agent"), as of the date hereof, over 1,900 Proofs of Claim and 800 Proofs of Interest have been filed in the Chapter 11 Case. The Trustee and his advisors have been diligently working to reconcile the Proofs of Claims and Proofs of Interest in accordance with the Plan to enable a distribution to creditors as soon as possible.

1. Investor Claims

Many Investors filed multiple Investor Claims on behalf of their investments in the Debtors, and many Proofs of Interest encompassed multiple investments. The Plan provides that Investor Claims are "netted" to make sure Investors are treated as fairly as possible under the circumstances and each Investor will receive (a) a claim for money (or value of property) it invested in the Debtors over time *less* (i) all transfers to an Investor that represent a return of principal and (ii) any distributions the Investor received over the seven years prior to September 12, 2024 (the "Tranche 1 Claim") and (b) a claim for the distributions deducted (the "Tranche 2 Claim"). Plan at §§ 3.1, 3.9, and Ex. A ¶¶ 87-88.

In accordance with Solicitation Procedures Order,[5] the Committee sent each Investor an *Investor Claim Settlement Offer Letter* (each, a "Settlement Offer Letter") in their solicitation packages setting forth the Committee's calculation of the Investor's Tranche 1 Claim and Tranche 2 Claim as well as providing a detailed breakdown[6] of these calculations. Each investment on Schedule 1 to the Settlement Offer Letter was affiliated with a claim number or sub-claim number,[7] and Schedule 1 detailed the amount invested (*i.e.*, cash in) and the distributions associated with each investment (*i.e.*, cash out). If an Investor agreed with the calculations in the

[5] *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].

[6] This detail was provided in Schedule 1 attached to each Settlement Offer Letter.

[7] A sub-claim number was used when a Proof of Interest listed multiple investments.

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Settlement Offer Letter, the Investor was asked to sign the letter and return a copy to counsel for the Committee. If an Investor had a question or disagreed with the calculations on the Settlement Offer Letter, they were encouraged to reach out, and PwC US Business Advisory LLP ("PwC") scheduled a time to meet with them to review the Settlement Offer Letter.[8] As a result of this process, over 575 Investors have signed and accepted the proposed calculations of their Investor Tranche 1 Claim and Tranche 2 Claim. As approved by the Procedures Order, the Trustee has filed a series of motions seeking to update the claims register to reflect the resolutions reached through the Settlement Offer Letters—*i.e.*, to translate the agreements reached between the Committee (and then the Trustee) and Investor to the claims register. Docket Nos. 4475, 4477, 4479, 4481, 4483, 4485, 4487, 4489, and 4539. More than 2,000 Investor Claims have been resolved in this fashion. However, approximately 150 Investor Claims remain unresolved.

2. Non-Investor Claims

In addition to Investor Claims, approximately 2,100 Non-Investor Claims, including 1,900 Proofs of Claim, were asserted against the Consolidated Debtor and/or deemed filed pursuant to section 1111(a) of the Bankruptcy Code. The Non-Investor Claims include, but are not limited to, trade claims, tax claims, secured lender claims, and claims by tenants of properties previously owned by the Debtors. Pursuant to the Procedures Order, the Trustee has filed three Omnibus Objections thus far. Docket Nos. 4322, 4325, and 4328. Through the prosecution of the Omnibus Objections, approximately 250 Non-Investor Claims have been modified, disallowed, and/or expunged, reducing the amounts asserted against the LFM Debtors by approximately $65 million. The Trustee and his advisors are working on additional Omnibus Objections and potentially standalone claim objections, but approximately 1,000 Non-Investor Claims remain outstanding.

IV. RELIEF REQUESTED

The Trustee respectfully requests that the deadline to object to Claims under the Plan, which is currently set to expire on November 10, 2026 (the "Current Objection Deadline"), be

[8] Some of these meetings resulted in PwC issuing a revised Settlement Offer Letter to reflect new information.

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extended one hundred eighty (180) days, through and including May 10, 2027,[9] without prejudice to the Trustee's right to seek additional extensions thereof.

V. AUTHORITY FOR RELIEF REQUESTED

A. The Court has authority to extend the Current Objection Deadline.

The Court has the express authority to extend the Current Objection Deadline, and cause exists for it to do so. Section 8.2 of the Plan provides that the Current Objection deadline may be extended by the Court for cause shown. Plan § 8.2. This provision anticipates and provides the necessary authority for the Motion. Even in the absence of express authority, Bankruptcy Rule 9006(b) provides in relevant part that "when an act is required or allowed to be done at or within a specified period . . . by order of [the] court, the court for cause shown may at any time in its discretion . . . order the period enlarged . . . ." Fed. R. Bankr. P. 9006(b). The Plan and Confirmation Order provide that, pursuant to sections 105(a) and 1142 of the Bankruptcy Code, the Bankruptcy Court shall retain jurisdiction and power over all matters arising in, arising under, or related to the Chapter 11 Case and the Plan to the fullest extent permitted by law. Confirmation Order ¶ 41; Plan § 10.1. The Plan also provides that the Court retains jurisdiction for, *inter alia*, the following purposes:

> (a) Allow, classify, determine, disallow, establish the priority or secured or unsecured status of, estimate, limit, liquidate, or subordinate any Claim or Equity Interest, in whole or in part
>
> (f) enter such orders as may be necessary or appropriate to execute, implement, or consummate the provisions of the Plan

Plan § 10(a), (f). These provisions underscore the Court's authority to extend the Current Objection Deadline.

Indeed, the Plan's express authority to extend the Current Objection Deadline is consistent with the Court's general authority under sections 105(a) and 1142(b) of the Bankruptcy Code to issue orders necessary for the consummation of the Plan or to carry out the provisions of the Bankruptcy Code. *See* 11 U.S.C. § 105(a) ("The court may issue any order, process, or judgment

[9] 180 days from the Current Objection Deadline (as defined below) is Sunday, May 9, 2027. The next day that is not a Saturday, Sunday, or legal holiday is May 10, 2027. *See* Fed. R. Bankr. P. 9006.

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that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]."); 11 U.S.C. § 1142(b) ("The court may direct the debtor . . . to perform any other act . . . that is necessary for the consummation of the plan."); *see also Adelphia Bus. Solutions, Inc. v. Abnos*, 482 F.3d 602, 609 (2d Cir. 2007) ("Section 105(a) grants broad equitable power to the bankruptcy courts to carry out the provisions of the Bankruptcy Code so long as that power is exercised within the confines of the Bankruptcy Code."); *Nobel Grp., Inc. v. Bank (In re Nobel Grp., Inc.)*, 529 B.R. 284, 290-91 (Bankr. N.D. Cal. 2015) (quoting *Binder v. Price Waterhouse & Co., LLP (In re Resorts Int'l, Inc.)*, 372 F.3d 154, 165 (3d Cir. 2004) ("Post-confirmation jurisdiction is assumed by statute and rule: 11 U.S.C. § 1142(b) authorizes the bankruptcy court to 'direct' the debtor and any other necessary party... to perform any other act ... that is necessary for the consummation of the plan").

Finally, the Court has the inherent power "'to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.'" *Dependable Highway Express, Inc. v. Navigators Ins. Co.*, 498 F.3d 1059, 1066 (9th Cir. 2007) (quoting *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936)). This initial request to extend the Current Objection Deadline is in line with relief granted in chapter 11 cases in this District. *See, e.g.*, *In re PG&E Corporation*, Case No. 19-30088 (Bankr. N.D. Cal. June 8, 2026), Docket No. 15084 (extending claims objection deadline fourteen times, for a total of six years, with more extensions contemplated); *In re Shift Technologies, Inc.*, Case No. 23-30687 (Bankr. N.D. Cal. Sept. 28, 2026), Docket No. 1132 (extending claims objection deadline four times, for a total of two years, with more extensions contemplated);

B. Good cause exists to extend the Current Objection Deadline.

The Trustee has acted diligently and persistently to resolve the Investor Claims and Non-Investor Claims asserted in the Chapter 11 Case. To date, the Trustee has resolved more than 2,000 Investor Claims and 250 Non-Investor Claims. Yet approximately 150 Investor Claims and 1,000 Non-Investor Claims have yet to be resolved, and, as discussed above, they are the most fact-specific and are likely to be the most time-consuming to resolve. Because of the nature of the issues involved, the rate of resolution for the Remaining Investor Claims and Remaining Non-

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Investor Claims may not be commensurate with the rate of resolution thus far. The Trustee believes that the requested extension of one hundred eighty (180) days is required and reasonable in light of the circumstances, but that additional time may be necessary for certain claims in the future.

Extension of the Claims Objection Deadline will benefit all creditors and parties in interest. It will allow the Trustee to continue to engage in meaningful negotiations to resolve Investor Claims and Non-Investor Claims consensually, obviating the need to file objections. Such resolution without a formal objection benefits both the holder and the Trustee's other stakeholders because of the avoidance of the burden, cost, and expense of litigation. Further, if the Claims Objection Deadline is not extended, the Trustee will be compelled to divert his limited resources to supplement any pending objections to the Remaining Non-Investor Claims and file new objections to those Remaining Non-Investor Claims and Remaining Investor Claims to which he has not yet objected. If the requested relief were not granted, the Trustee would have two choices: forego filing meritorious objections, thus creating a windfall for holders, or file wasteful prophylactic omnibus objections shortly before the Current Objection Deadline elapses to preserve the Trustee's rights. This would be inefficient and burdensome for the Trustee and the Court, and inconvenient for holders of the Remaining Investor Claims and Remaining Non-Investor Claims. Extending the Current Objection Deadline will not prejudice holders because such an extension is contemplated by the Plan. Whether or not the Current Objection Deadline is extended, they will have a full and fair opportunity to be heard if and when an objection is litigated. For these reasons, the Trustee submits that extending the Current Objection Deadline through and including May 10, 2027, without prejudice to seek additional extensions thereof is appropriate under the circumstances.

VI. NOTICE

Notice of this Motion will be provided to (i) the Office of the United States Trustee for Region 17 and (ii) those persons who have formally appeared in the Chapter 11 Case and requested notice pursuant to Bankruptcy Rule 2002. The Trustee respectfully submits that no further notice is required.

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VII. CONCLUSION

For the reasons set forth above, the Trustee respectfully requests entry of the Proposed Order granting the relief requested herein, and such other and further relief for the Trustee as the Court may deem just and proper.

Dated: October 15, 2026

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PACHULSKI STANG ZIEHL & JONES LLP

By: */s/ Dara L. Silveira*
Dara L. Silveira

Attorneys for Michael I. Goldberg, as Trustee of the LFM Plan Recovery Trust

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EXHIBIT A

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Attorneys for Michael I. Goldberg, as Trustee of the LFM Plan Recovery Trust

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re: LEFEVER MATTSON, Consolidated Debtor.	Case No. 24-10545 (HLB) (Substantively Consolidated) Chapter 11 **[PROPOSED] ORDER EXTENDING DEADLINE FOR TRUSTEE OF THE LFM PLAN RECOVERY TRUST TO RESOLVE PROOFS OF INTEREST AND OBJECT TO CLAIMS**

Upon the motion dated October 15, 2026 [Dkt. No. •] (the "Motion") of Michael I. Goldberg (the "Trustee"),[1] solely in his capacity as Trustee of the LFM Plan Recovery Trust, formed pursuant to the *Third Amended Chapter 11 Plan of Liquidation, as Modified* [Dkt. No. 4151] (the "Plan") in the above-captioned chapter 11 case (the "Chapter 11 Case") of consolidated debtor LeFever Mattson (the "Consolidated Debtor"),[2] in accordance with Section 8.2 of the Plan, sections 105(a) and 1142 of title 11 of the United States Code (the "Bankruptcy Code"), and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for entry of an order extending the deadline established under the Plan for the Trustee to object to Claims by one hundred eighty (180) days, through and including May 10, 2027,[3] without prejudice to the Trustee's right to seek additional extensions thereof; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. section 157(b); and venue being proper before this Court pursuant to 28 U.S.C. sections 1408 and 1409; and the Court having found and determined that notice of the Motion as provided to the parties listed therein is reasonable and sufficient, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion and the Goldberg Declaration submitted in support thereof; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best

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[1] On May 14, 2026 (the "Effective Date"), the Plan, confirmed by the Court on April 23, 2026 [Dkt. No. 4225] (the "Confirmation Order"), became effective. *See* Dkt. No. 4335. As of the Effective Date, the Trustee retains all rights to institute, commence, file, pursue, prosecute, enforce, abandon, settle, compromise, release, waive, dismiss, or withdraw, as appropriate, any and all Causes of Action[.]" Confirmation Order, ¶ 13.

[2] On March 6, 2026, the Court entered the *Order Substantively Consolidating Debtors and KSMP Investment Entities and Granting Related Relief* [Dkt. No. 3914] (the "Substantive Consolidation Order"), which substantively consolidated the estates of LeFever Mattson, a California corporation and its affiliated debtors (the "LFM Debtors"), KS Mattson Partners, LP ("KSMP," and together with the LFM Debtors, the "Debtors") and three KSMP-affiliated entities (Perris Freeway Plaza, LP, Specialty Properties Partners, LP, and Treehouse Investments, LP), forming the "Consolidated Debtor."

[3] 180 days from the Current Objection Deadline (as defined below) is Sunday, May 9, 2027. The next day that is not a Saturday, Sunday, or legal holiday is May 10, 2027. *See* Fed. R. Bankr. P. 9006.

interests of all parties in interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as provided herein.

2. The deadline for the Trustee to object to Claims under Section 8.2 of the Plan is extended by one hundred eighty (180) days, through and including May 10, 2027, without prejudice to the right of the Trustee to seek additional extensions thereof.

3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

** END OF ORDER **

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