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13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SANTA ROSA DIVISION**

<p>16 In re:</p> <p>17 LEFEVER MATTSON, a California 18 corporation, <i>et al.</i>,¹</p> <p>19 Debtors.</p>	<p>20 Case No.: 24-10545 (CN)</p> <p>21 (Jointly Administered)</p> <p>22 Chapter 11</p>
<p>23 In re:</p> <p>24 KS MATTSON PARTNERS, LP,</p> <p>25 Debtor.</p>	<p>26 Case No.: 24-10715 (CN)</p> <p>27 Chapter 11</p> <p>28 [No Hearing Requested]</p>

29 **SECOND STIPULATION TO EXTEND RESPONSE DEADLINE TO THE MOTION OF
30 THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR SUBSTANTIVE
31 CONSOLIDATION OF DEBTOR LEFEVER MATTSON AND KS MATTSON
32 PARTNERS, LP AND FOR RELATED RELIEF**

33 ¹ The last four digits of LeFever Mattson’s tax identification number are 7537. Due to the large number of debtor
34 entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax
35 identification numbers is not provided herein. A complete list of such information may be obtained on the website
36 of the Debtors’ claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors
37 is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

1 The Official Committee of Unsecured Creditors (the “Committee”), the above-captioned
2 debtors and debtors-in-possession (the “LFM Debtors”), and KS Mattson Partners, LP (“KSMP”
3 and together with the LFM Debtors and the Committee, the “Parties”) hereby stipulate and agree
4 (“Stipulation”) as follows:

5 1. On June 20, 2025, the Committee filed a *Motion of the Official Committee of*
6 *Unsecured Creditors for Substantive Consolidation of Debtor LeFever Mattson and KS Mattson*
7 *and KS Mattson Partners, LP and for Related Relief* (the “Motion”). See Case No. 24-10545, ECF
8 No. 1585, and Case No. 24-10715, ECF No. 157.

9 2. The Motion is presently scheduled to be heard on July 25, 2025 at 11:00 a.m.
10 (Pacific Time) (the “Hearing”). See Case No. 24-10545, ECF No. 1684 and Case No. 24-10715,
11 ECF No. 184.

12 3. On July 18, 2025, the Court entered the *Order Approving Stipulation to Extend*
13 *Response Deadline to the Motion the Official Committee of Unsecured Creditors for Substantive*
14 *Consolidation of Debtor LeFever Mattson and KS Mattson Partners, LP and for Related Relief*
15 [Case No. 24-10545, ECF No. 1776 and Case No. 24-10715, ECF No. 224] extending the deadline
16 for the LFM Debtors and KSMP to file a response to the Motion to July 22, 2025 at 4:00 p.m.
17 (Pacific Time) (the “Response Deadline”)

18 4. A reasonable amount of time beyond the Response Deadline is needed for any
19 potential response to the Motion by the LFM Debtors and KSMP.

20 5. The Parties hereby agree that the Response Deadline is further extended to
21 July 22, 2025 at 11:59 p.m. (Pacific Time).

22 6. This Stipulation is subject to the approval of the Bankruptcy Court, and the Parties
23 agree to present the Stipulation to the Bankruptcy Court for approval.

24 7. The Parties agree that the Bankruptcy Court shall retain jurisdiction with respect to
25 all matters arising under or related to the interpretation or implementation of this Stipulation.

26 8. This Stipulation shall be effective immediately upon entry of an order approving
27 this Stipulation.

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Dated: July 22, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Steven W. Golden
Steven W. Golden

Counsel to the Committee

Dated: July 22, 2025

KELLER BENVENUTTI KIM LLP

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

Counsel to the LFM Debtors

Dated: July 22, 2025

HOGAN LOVELLS US LLP

By: /s/ Erin N. Brady
Erin N. Brady

Counsel to KSMP