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7 *Attorneys for Debtor and Debtor in Possession*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SANTA ROSA DIVISION**

11 In Re:  
12 LEFEVER MATTSON, a California  
13 corporation, et al,  
14 Debtor.

Case No. 24-10545  
(Jointly Administered)  
Chapter 11

15  
16 In Re:  
17 KS MATTSON PARTNERS, LP,  
18 Debtor.<sup>1</sup>

Case No. 24-10715  
**KS MATTSON PARTNERS, LP'S  
PRELIMINARY RESPONSE AND  
RECOMMENDATION RELATING TO  
MOTION BY THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS FOR SUBSTANTIVE  
CONSOLIDATION OF DEBTOR  
LEFEVER MATTSON AND KS  
MATTSON PARTNERS, LP**

**Hearing**

Date: July 25, 2025 at 11:00 am  
Place: United States Bankruptcy Court  
1300 Clay Street, Courtroom 215  
Oakland, CA 94612  
Judge: Hon. Charles Novack

26 <sup>1</sup> The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing  
27 address is c/o Stapleton Group, 514 Via de la Valle, Suite 210, Solana Beach, CA 92075.



1 KS Mattson Partners, LP (the “Debtor” or “KSMP”), hereby submits this *Preliminary*  
2 *Response and Recommendation* relating to the Official Committee of Unsecured Creditors’ (the  
3 “LFM Committee”) *Motion for Substantive Consolidation of Debtor LeFever Mattson and KSMP*  
4 (the “Motion”).

5 **I. PRELIMINARY RESPONSE AND RECOMMENDATION**

6 **A. OVERVIEW AND SUMMARY OF RECOMMENDATIONS**

7 As reflected in KSMP’s July 18, 2025 status conference report (Docket No. 216), in the 36  
8 days since being appointed by the Court as the Responsible Individual for KSMP, Robbin Itkin  
9 (“Ms. Itkin”) organized a substantial effort to comply with the requirements for Chapter 11,  
10 ascertain as best as possible the basic facts with respect to the Debtor’s assets and liabilities, and  
11 deal with a host of pressing business and legal issues, perhaps most significantly the Motion for  
12 substantive consolidation. Ms. Itkin, on KSMP’s behalf, is guided by the principle that her primary  
13 duty as a fiduciary is to maximize the value that can be returned to all creditors and investors as  
14 efficiently and expeditiously as possible, and provide information and recommendations as soon as  
15 possible, even if it is necessarily a preliminary view.<sup>2</sup>

16 The Motion—including the detailed information and exhibits in the declarations filed with  
17 it, as well as the two additional declarations filed on July 11, 2025 (collectively “Supporting  
18 Declarations”)—together with the additional information obtained and diligence performed by Ms.  
19 Itkin and her professionals on KSMP’s behalf, establishes a compelling case for substantive  
20 consolidation, as further described below.<sup>3</sup> This is particularly evident when considering the  
21 extremely high cost and complexity of trying to untangle the historical transactions and cash  
22 transfers described in the Motion and Supporting Declarations—assuming it is even possible to  
23 accurately reconstruct the books and records for each entity involved. That said, while the evidence

24 <sup>2</sup> Ms. Itkin intends to soon hold a “town hall” for KSMP investors and creditors, where she will  
25 provide more detail to interested investors and creditors about the work that has been done to date  
26 and the steps she plans to take in the future to maximize the value of KSMP and its assets for  
27 their benefit. Further details will be forthcoming.

28 <sup>3</sup> In conjunction with its recommendation that the Motion be delayed and considered in conjunction  
with plan confirmation, KSMP reserves the right to conduct further diligence and make a final  
recommendation to creditors and the Court with respect to substantive consolidation in connection  
with confirmation of a plan.

1 in support of substantive consolidation is strong, Ms. Itkin believes that given her recent  
2 appointment, it is necessary and appropriate to conduct additional diligence before making a final  
3 recommendation.

4 Recognizing this, since the Motion was filed, Ms. Itkin has engaged in substantial  
5 discussions with the LFM Committee and the LFM Debtors regarding the appropriate path  
6 forward—one that will result in the greatest recoveries for creditors and investors in the least  
7 amount of time and for the least possible expense. As a result of those discussions, the parties have  
8 agreed that substantive consolidation should be addressed in conjunction with a chapter 11 plan,  
9 rather than through immediate litigation of the Motion. To that end, the parties have agreed to defer  
10 further proceedings on the Motion and to address substantive consolidation in connection with  
11 confirmation of a joint plan for all related entities, subject to the Court granting certain necessary,  
12 interim relief. Proceeding through the plan process will allow creditors and investors to receive  
13 more comprehensive (albeit likely still imperfect) information and analysis through a court-  
14 approved disclosure statement, enabling a more transparent and informed determination regarding  
15 whether substantive consolidation is appropriate.

16 Moving forward efficiently through the plan process, however, depends on certain interim  
17 relief being granted now. Without that relief, developing a confirmable joint plan will become  
18 significantly more costly and time-consuming, resulting in unnecessary administrative expense and  
19 delay.

20 A primary concern of all parties is the need to process and analyze investor claims against  
21 KSMP together with claims held against LFM and its other related debtors (the “LFM Debtors”).  
22 Many creditors and investors hold claims against or interests in both the KSMP and LFM Debtors,  
23 and the only way to provide them with a clear understanding of how a joint plan effectuating  
24 substantive consolidation would treat those collective claims is to evaluate them together. PwC,  
25 which already serves as financial advisor to the LFM Committee and has extensive familiarity with  
26 the claims data, is well positioned to conduct this analysis efficiently. Without the ability for PwC  
27 to perform this work with respect to both KSMP and LFM Debtors, KSMP would be required to  
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1 retain separate professionals to work alongside PwC to duplicate much of the same work—resulting  
2 in significantly higher costs (likely millions of dollars) and substantial delay. The LFM Committee,  
3 LFM Debtors and KSMP are currently in discussions as to the best way to ensure that PwC can do  
4 this important work— but all parties agree that this relief is critical to addressing the question of  
5 substantive consolidation in a plan process.

6 While this claims work proceeds, Ms. Itkin and her professionals will continue their  
7 diligence into both KSMP’s assets and liabilities and the financial and operational entanglements  
8 among KSMP and the LFM Debtors. Based on the claims analysis and this further factual diligence,  
9 Ms. Itkin will present a formal recommendation to the KSMP creditors and investors, and to the  
10 Court, as to whether the substantive consolidation of KSMP with the LFM Debtors, as  
11 contemplated in the Plan Term Sheet,<sup>4</sup> is warranted.

12 To address these operational and procedural needs, among others, Ms. Itkin, the LFM  
13 Debtors and the LFM Committee have reached agreement on a series of measures designed to allow  
14 these cases to move forward as efficiently as possible—without immediate substantive  
15 consolidation—into and through a plan process. These include:

- 16 • The Motion will be continued and heard in conjunction with plan confirmation, after  
17 approval by the Court of a disclosure statement for creditors and investors;
- 18 • KSMP will file a motion for the setting of an expedited bar date for creditors and  
19 investors to file claims, which will use a revised court approved form for proofs of  
20 claim;
- 21 • Subject to Court approval, the KSMP case will be partially jointly administered, **but not**  
22 **substantively consolidated**, with the LFM case in order to facilitate a cost-effective plan  
23 and resource-sharing process, but both cases will remain in separate dockets for  
24 purposes of filing proofs of claim. Similarly, Ms. Itkin and her independent  
25 professionals will remain in place to protect KSMP’s creditors and interest holders. The  
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27 <sup>4</sup> As used herein, “Plan Term Sheet” means that certain *Plan Term Sheet* filed by the LFM  
28 Debtors and LFM Committee on July 14, 2025

1 form of order effectuating this partial joint administration is currently being negotiated  
2 among the LFM Debtors, LFM Committee and KSMP—with input from the Office of  
3 the United States Trustee—and KSMP understands that a draft will be filed with the  
4 LFM Committee’s reply papers on the Motion.

- 5 • PwC<sup>5</sup> will be asked to perform a claims analysis of all investor claims filed in the KSMP  
6 case. This will be additive to its ongoing work analyzing investor claims filed in the  
7 LFM Debtors cases, but will not include any non-investor claims filed in the KSMP  
8 case. The mechanism by which this is achieved will depend on the process and feedback  
9 of the United States Trustee’s office.

10 Finally, recognizing these cases are at a critical stage—with a plan and key litigation about  
11 to be filed and certain other key litigation pending—the parties will shortly file a motion requesting  
12 that Retired Bankruptcy Judge Randall Newsome be appointed as mediator to attempt to assist in  
13 resolving any disputes among the parties relating to substantive consolidation, plan confirmation  
14 or other case issues and disputes.

## 15 **B. DUE DILIGENCE TO DATE**

16 The Debtor had no organized books and records or accounting system, nor any employees,  
17 when the Order for Relief was entered by the Court and Ms. Itkin was subsequently approved as  
18 the Responsible Individual in charge of the company and the bankruptcy process. The critical issues  
19 faced, and ongoing tasks performed, by Ms. Itkin and her professional advisors on KSMP’s behalf  
20 can generally be described as falling into the following categories which are more fully described  
21 in the July 18 Status Report:

- 22 • Control Over KSMP Bank Accounts and Funds

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26 <sup>5</sup> PwC has performed and is continuing to perform a detailed analysis of the filed claims in the  
27 LFM Debtor cases and has extensive familiarity with the factual basis asserted in such claims, as  
28 well as the overlapping nature with claims relating to KSMP or KSMP properties. Having PwC  
perform this factual analysis instead of bringing in a new set of financial professionals is the most  
cost-effective and efficient means to enable the plan process to proceed as quickly as possible.

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- The Debtor has opened debtor-in-possession accounts at City National Bank and Ms. Itkin has now assumed sole signatory control over the Debtor’s pre-petition account at First Bank and because the Debtor is also general partner of a non-debtor entity which has a bank account at First Bank, Ms. Itkin has also assumed signatory control over that account.
- Diligence Necessary to Determine the Most Effective Path Forward on All Issues
  - Factual investigation of assets and liabilities in order to prepare required bankruptcy schedules, motions and disclosures;
  - Multiple meetings and coordinating with existing professionals for all relevant parties (LFM Debtors, LFM Committee, United States Trustee, United States Attorney, SEC and Ken Mattson’s criminal and civil counsel) with respect to the ongoing investigations and proceedings in order to obtain as much information as possible as quickly as possible;
  - Review of available documentation and identification of missing documentation to request of the relevant parties, including analyzing more than eighty proofs of claims filed by investors against LFM and/or KSMP, Socotra loan documents, title reports, and a sampling of property management records;
  - Quality control and quality assurance review of sampling of documentation relied upon by PwC in support of its declaration submitted in support of substantive consolidation, including the review of approximately eighty filed proofs of claim, including the specific examples cited in the Supporting Declarations; and
  - Comprehensive search for all nationwide active litigation matters involving KSMP and research regarding likelihood of available damages verdicts and/or liabilities. Further diligence is necessary, but search results include a California litigation matter in which LFM sought substitution on KSMP’s behalf “[d]ue

1 to organizational restructuring.” Ex Parte Application for an Order Substituting  
2 LeFever Mattson as Plaintiff in Place of KS Mattson Partners, LP, *KS Mattson*  
3 *Partners, LP vs. Benedetti Farms, Inc.*, No. SCV-270023 (Cal. Super. Ct. Jan  
4 20, 2022), at 3.

- 5 • Property Identification, Management and Operations (Including Insurance Issues)
- 6 • Cash Collateral Usage and Seeking DIP Financing

7 **C. PRELIMINARY FINDINGS**

8 As discussed above, the Motion, and in particular the detailed information and exhibits in  
9 the Supporting Declarations filed on July 11, 2025, provide strong support for substantive  
10 consolidation. But further analysis and work are required and will be helpful for both the Court and  
11 KSMP creditors and investors when considering the issue of substantive consolidation in the plan  
12 process.

13 For example, KSMP is preparing its *Schedules of Assets and Liabilities and Statement of*  
14 *Financial Affairs* (“Bankruptcy Schedules”), which are due to be filed on August 8, 2025.

15 KSMP is also preparing to set a bar date in short order.<sup>6</sup> The Motion therefore does not and cannot  
16 include an analysis of the impact of substantive consolidation on the creditors of the KSMP case,  
17 which would require as a predicate both an analysis of the claims that exist or will be filed against  
18 KSMP and disentangling years of financial and real estate transactions between the LFM Debtors  
19 and KSMP. Neither of these issues are an absolute bar to substantive consolidation, as bankruptcy  
20 courts can and regularly do consolidate non-debtor entities with debtor entities without the benefit  
21 of Bankruptcy Schedules or filed claims. But having that information may prove very useful to  
22 KSMP creditors and investors and the Court.

23 At the same time, however, KSMP also recognizes that the multi-layered and detailed  
24 analysis necessary to disentangle many years of financial and real estate transactions may well

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26 <sup>6</sup> KSMP has considered how best to streamline the process and proceed. A critical first step is  
27 establishing a bar date. Its counsel is preparing a bar date motion, which will propose a  
28 September 5, 2025, bar date for the filing of claims in the KSMP case. This expedited bar date is  
designed to allow for the plan process to conclude this year, ensuring that creditors and investors  
receive distributions as soon as possible.

1 prove to be cost prohibitive, impossible, or futile. As described in the Declaration of Kristin Rivera,  
2 the cost alone of disentangling years of financial and real estate transactions and attempting to  
3 separate out assets and liabilities between and among all of the relevant entities could well exceed  
4 \$20 million. And that could, in fact, be a low estimate, as only a minimal amount of time is devoted  
5 to each transaction, and for many, there may be additional time required if it is even possible to  
6 ascertain the reasons for various transactions.

7 Finally, the nature of the claims filed in the LFM Debtor cases, many of which contain or  
8 overlap in whole or in part with claims in the KSMP case will, if similar claims are filed against  
9 KSMP, preclude a simple and cost-effective method of performing a claims analysis. To date,  
10 KSMP has been informed that PwC has spent in excess of \$2 million with respect to creating a  
11 claims database and analyzing the LFM Debtors' financial records and the claims filed in the LFM  
12 Debtor cases. Ms. Rivera, who has an extensive background in forensic accounting and  
13 investigations, has in fact opined that "I believe it is likely that any such attempt at disentanglement  
14 will be unsuccessful, notwithstanding the expenditure of tens of millions of dollars to attempt to do  
15 so." Rivera Declaration, at ¶ 27.

#### 16 **D. RECOMMENDATION**

17 Ms. Itkin is guided by the principle that her primary duty as a fiduciary is to maximize value  
18 for all creditors and investors as efficiently and expeditiously as possible, while providing informed  
19 recommendations throughout the process. She therefore believes it is more appropriate to defer a  
20 final recommendation on substantive consolidation until after the KSMP Bankruptcy Schedules are  
21 filed, claims against and interests in KSMP have been filed reviewed, and further diligence can be  
22 completed—recognizing that a full analysis may prove cost prohibitive or even infeasible.

23 In Ms. Itkin's view, the issue of substantive consolidation should be addressed in connection  
24 with confirmation of a coordinated or combined plan of liquidation with the LFM Debtors and  
25 KSMP. This approach would eliminate the need for a complex and costly evidentiary hearing on  
26 the Motion prior to confirmation, allow stakeholders to consider the recommendations of Ms. Itkin,  
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1 the LFM Debtors, and the LFM Committee with the benefit of a detailed disclosure statement, and  
2 support a timeline that could enable plan confirmation and distributions by year-end.

3 As discussed above, Ms. Itkin, on KSMP's behalf, has productively discussed these issues  
4 with some of the most significant represented interested parties, including the LFM Debtors and  
5 LFM Committee, as well as certain parties who have objected to substantive consolidation.  
6 Following those discussion, the parties agreed to defer the Motion pending the consideration of,  
7 and voting on, a joint plan of liquidation (the "Joint Plan") on the condition that the interim relief  
8 described above is granted—a result that both avoids costly litigation of the substantive  
9 consolidation motion and allows KSMP creditors and interest holders to weigh in on the issue  
10 directly.<sup>7</sup> Accordingly, to facilitate consideration of the Joint Plan, the LFM Committee, LFM  
11 Debtors and KSMP have agreed to the framework outlined above, to be incorporated in an order  
12 submitted with the LFM Committee's reply brief.

13 An important additional request by KSMP which has been agreed to by the LFM Debtors  
14 and LFM Committee is that the Plan process include a mediation option for interested creditors to  
15 voice their concerns and seek guidance and clarity. A motion requesting the Court's approval of  
16 this option is forthcoming. In that motion, KSMP will request that this Court appoint a former  
17 bankruptcy judge, Randall Newsome, who is acceptable to the other statutory fiduciaries as he as  
18 substantial relevant experience and qualifications, as a mediator. Any creditor with objections to  
19 the Plan can participate in the mediation with the plan proponents. The mediator would serve as a  
20 neutral third party and seek to resolve any such objections or other critical case issues that the  
21 parties agree to mediate. Bankr. N.D. Cal. R. 9040-2 ("It is the Court's intention that the  
22 [Bankruptcy Dispute Resolution Program] shall operate in such a way as to allow the participants  
23 to take advantage of and utilize a wide variety of alternative dispute resolution methods. These  
24 methods may include but are not limited to: mediation, negotiation, early neutral evaluation and  
25 settlement facilitation. The specific method or methods employed will be those that are appropriate  
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27 <sup>7</sup> KSMP understands that absent the resolution outlined herein, the LFM Committee would  
28 prosecute the Motion. This would be a costly endeavor given the objections that have been filed.

1 and applicable as determined by the Resolution Advocate [(e.g., mediator)] and the parties, and will  
2 vary from matter to matter”).

3 **II. CONCLUSION**

4 Based on the foregoing, Ms. Itkin on, behalf of KSMP, respectfully requests that this Court  
5 defer consideration of the Motion until plan confirmation and enter an order (as presented by the  
6 LFM Committee, with KSMP’s approval) granting the interim relief critical to the process outlined  
7 herein.

9 DATED: July 22, 2025

*/s/ Richard L. Wynne*

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Possession*

**CERTIFICATE OF SERVICE**

KRISTEL GELERA:

1. I am employed in the County of San Mateo, State of California. I am over the age of 18 and not a party to the within action. I am employed at Hogan Lovells US LLP and my business address is 855 Main Street, Suite 200, Redwood City, CA 94063.

2. I certify that on July 22, 2025, the *KS Mattson Partners, LP's Preliminary Response and Recommendation Relating to Motion by the Official Committee of Unsecured Creditors for Substantive Consolidation of Debtor Lefever Mattson and KS Mattson Partners* was served by the court via NEF and hyperlink to the documents on the parties listed on the annexed **Exhibit A**.

San Jose, California

/s/ Kristel Gelera

Dated July 22, 2025

Kristel Gelera

**EXHIBIT A**

***In re KS Mattson Partners, LP***  
**Case No. 24-10715**

<b>Name</b>	<b>Party</b>	<b>Email</b>
Asaph Abrams	JPMorgan Chase Bank, N.A.	ecfcanb@aldridgepite.com
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Gillian Nicole Brown	Official Committee of Unsecured Creditors of LeFever Mattson	gbrown@pszjlaw.com
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Benjamin R. Levinson	Y. Tito Sasaki and Janet L. Sasaki Trust	ben@benlevinsonlaw.com
Dara Levinson Silveira	LeFever Mattson, a California corporation and Windtree, LP (Petitioning Creditor)	dsilveira@kbkllp.com, hrobertsdonnelly@kbkllp.com

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<sup>1</sup> Fennemore lawyers were debtor's counsel prior to consent to the involuntary filing. Hogan Lovells US LLP will be debtor's counsel going forward.

<b>Name</b>	<b>Party</b>	<b>Email</b>
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