

EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA



1 Debra I. Grassgreen (CA Bar No. 169978)
2 John D. Fiero (CA Bar No. 136557)
3 Jason H. Rosell (CA Bar No. 269126)
4 Brooke E. Wilson (CA Bar No. 35461)

The following constitutes the order of the Court.
Signed July 29, 2025

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Charles Novack
U.S. Bankruptcy Judge

8 *Counsel to the Official Committee*
9 *of Unsecured Creditors*

10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SANTA ROSA DIVISION

12 In re
13 LEFEVER MATTSON,
14 a California corporation, *et al.*
15 Debtor.
16
17 In re
18 KS MATTSON PARTNERS, LP,
19 Debtor.

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

Case No. 24-10715 (CN)
Chapter 11

20 STIPULATED BRIDGE ORDER IN CONNECTION WITH THE
21 MOTION TO SUBSTANTIVELY CONSOLIDATE THE BANKRUPTCY
22 ESTATES OF LEFEVER MATTSON AND KS MATTSON PARTNERS, LP

23 The Court has read and considered the *Motion of the Official Committee of Unsecured*
24 *Creditors for Substantive Consolidation of Debtor LeFever Mattson and KS Mattson Partners, LP*
25 *and for Related Relief* [Docket No. 1585] (the "Substantive Consolidation Motion"), the
26 declarations filed in connection therewith, and the responses thereto. The Court has been advised
27 by counsel for KS Mattson Partners, LP ("KSMP"), LeFever Mattson ("LeFever Mattson") and its
28 affiliated debtors (collectively, the "LFM Debtors" and together with KSMP, the "Debtors"), and



1 the Official Committee of Unsecured Creditors of the LFM Debtors (the “Committee”), that the
2 Committee has agreed to defer the Substantive Consolidation Motion pending the consideration
3 of, and voting on, a joint plan of liquidation for the LFM Debtors and KSMP (the “Joint Plan”) on
4 the condition that certain *interim* relief is granted as set forth herein. Accordingly, to facilitate
5 consideration of the Joint Plan, the parties have agreed to jointly administer the related cases, in
6 lieu of substantive consolidation, pursuant to the terms of this order (the “Bridge Order”). The
7 Court having found that notice of the Substantive Consolidation Motion was properly given under
8 the circumstances and that the relief in this Order is part of the relief requested in the Substantive
9 Consolidation Motion; the Court having found that KSMP is an affiliate of LeFever Mattson
10 pursuant to section 101(2)(B) of the Bankruptcy Code; and the Court having determined that good
11 cause exists to grant the relief herein,

12 **IT IS HEREBY ORDERED THAT:**

13 **Continuance of Substantive Consolidation Motion**

14 1. The Substantive Consolidation Motion will be held in abeyance pending the filing
15 and prosecution of the Joint Plan, unless and until the Committee elects to proceed with such
16 motion. In the event the Committee decides to pursue the Substantive Consolidation Motion, the
17 Committee shall file a proposed discovery and trial schedule and set the request for Court approval
18 of the proposed discovery and trial schedule for a status conference on not less than fourteen (14)
19 calendar days’ notice. All parties in interest reserve their right to be heard with respect to the scope,
20 timing, and discovery related to any motion or proposal for the substantive consolidation of KSMP
21 and LeFever Mattson (or any other entity); *provided, however*, in the event the Committee elects
22 to proceed with the Substantive Consolidation Motion, only parties in interest that timely objected
23 to the Substantive Consolidation Motion may be heard with respect thereto.

24 **Limited Administrative Consolidation**

25 2. The chapter 11 case of KSMP, Case No. 24-10715 (the “KSMP Case”) shall be
26 administratively consolidated with the jointly administered chapter 11 cases of the LFM Debtors,
27 Case No. 24-10545 (CN) (the “Joint Case”), solely for the limited administrative purposes set forth
28 herein.

1 3. The assets and liabilities of KSMP, LeFever Mattson and the other LFM Debtors
2 shall not be consolidated by virtue of this Order.

3 4. Robbin Itkin shall remain in place as the Responsible Person for KSMP on the
4 terms and conditions set forth in this Court’s *Final Order Authorizing Designation of Robbin L.*
5 *Itkin as Responsible Individual Pursuant to B.L.R. 4002-1* [KSMP Docket No. 172].

6 5. KSMP and the LFM Debtors shall continue to retain their own professional
7 advisors at their own expense except with respect to Kurtzman Carson Consultants, LLC dba
8 Verita Global as the claims and noticing agent in the LFM Debtors’ case (the “Claims Agent”) as
9 set forth herein.

10 6. The Clerk of the Court shall maintain one file and one docket for the Debtors’
11 chapter 11 cases, which file and docket shall be the file and docket for the Joint Case. The caption
12 of the jointly administered chapter 11 cases shall read as follows:

13 In re 14 LEFEVER MATTSON, 15 a California corporation, <i>et al.</i> 16 Debtors.	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11
17 18 In re 19 KS MATTSON PARTNERS, LP, 20 Debtor.	

22 7. All pleadings and notices shall be captioned as indicated in the preceding
23 paragraph, and all original docket entries shall be made in the Joint Case. Any matter set for
24 hearing in the KSMP Case shall be deemed set for hearing in the Joint Case and any papers related
25 to such matter shall be filed in the Joint Case. The consolidated caption satisfies the requirements
26 of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n) in all
27 respects.
28

1 8. An entry shall be made on the docket of the KSMP Case as follows:

2 An order has been entered in this case in accordance with Rule
3 1015(b) of the Federal Rules of Bankruptcy Procedure directing the
4 procedural consolidation and joint administration of KS Mattson
5 Partners, LP and LeFever Mattson, a California corporation, and its
6 affiliate debtors. All further pleadings and other papers shall be filed
7 in, and all further docket entries shall be made in, the docket of
8 LeFever Mattson, a California corporation, Case No. 24-10545, and
9 such docket should be consulted for all matters affecting this chapter
10 11 case.

11 9. Unless otherwise ordered by the Court, the Debtors shall file separate schedules of
12 assets and liabilities, statements of financial affairs, and periodic operating reports, and each
13 Debtor will maintain a separate claims register through the Claims Agent. Parties' rights to request
14 consolidation of such reports, schedules, statements, or claims registers are preserved.

15 **Claims Agent**

16 10. The Court's order [Docket No. 47] authorizing and approving the appointment of
17 the Claims Agent is hereby modified and amended to include KSMP within its definition of
18 Debtors; *provided, however*, the Claims Agent shall separately account for any fees and expenses
19 incurred by the Claims Agent in connection with providing Claims Services (as defined therein)
20 to KSMP or the KSMP Case.

21 11. The Claims Agent shall consolidate for mailing and service purposes the creditor
22 mailing matrix of KSMP with that of the LFM Debtors.

23 **Reservation of Rights**

24 12. The entry of this Order is without prejudice to any of the Debtors seeking to
25 substantively consolidate any other Debtor or any non-debtor entity, and all parties in interest,
26 including those that objected to the Substantive Consolidation Motion, reserve all rights to be heard
27 with respect to any such requested substantive consolidation.

28 13. The Court retains jurisdiction with respect to all matters arising under or related to
the interpretation or implementation of this Order.

**** END OF ORDER ****

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APPROVED AS TO FORM:

KELLER BENVENUTTI KIM LLP

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

Counsel to the LFM Debtors

HOGAN LOVELLS US LLP

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

Counsel to KSMP Debtor

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COURT SERVICE LIST

All ECF Participants