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 8 UNITED STATES BANKRUPTCY COURT
 9 NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION
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11 In re
 12 LEFEVER MATTSON, a California
 13 corporation, et al,
 14 Debtors.

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

**CHASE 1992 FAMILY TRUST'S EX
 PARTE APPLICATION FOR AN ORDER
 PURSUANT TO RULE 2004
 AUTHORIZING EXAMINATION OF
 SOCOTRA CAPITAL, INC.**

15 In re
 16 KS MATTSON PARTNERS, LP,
 17 Debtor,
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The Hon. Charles D. Novack

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 20 THE CHASE 1992 FAMILY TRUST (the "Chase Trust") submits this ex parte application
 21 for an order authorizing an examination of Socotra Capital, Inc., and its affiliates, Socotra
 22 Management, Inc.; The Socotra Fund, LLC; Socotra REIT I LLC; The Socotra Opportunity Fund,
 23 LLC; Socotra Opportunity REIT I LLC; Socotra Holdings, LLC; Socotra Capital, Inc., 401(k) Plan;
 24 Herzer Financial Services, Inc.; Herzer Financial Mortgage Fund, LLC; Herzer Financial Mortgage
 25 REIT LLC; and HFS Fund IV, LLC (collectively, "Socotra"), including the subpoena of documents,
 26 pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure.

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I.
FACTS

In 2022, Ken Mattson, through KS Mattson Partners, LP, purchased property located at 414 West Napa Street, Sonoma, California, for \$2,325,000 (the “Napa Street Property”). Mr. Mattson immediately financed the Napa Street Property with Socotra, securing a short-term loan of \$1,395,000 with high interest. Mr. Mattson induced the Chase Trust, through the guise of a 1031 exchange, to invest \$825,000 in exchange for a 25.5% tenant in common interest in the Napa Street Property. Even if the Napa Street Property was not destined for foreclosure from the beginning of the scheme, the 25.5% interest was worth no more than \$237,150. The Socotra loan was not disclosed to the Chase Trust. The Chase Trust seeks to investigate whether KS Mattson Partners, LP, at the time of taking out the loan, made the transfer to hinder, delay, or defraud creditors, and if so, if Socotra was acting in good faith. The Chase Trust also seeks to investigate potential claims against Socotra for recovery and avoidance of its lien on the Napa Street Property, and any defenses Socotra may have. An examination under Rule 2004 will further this investigation.

II.
DISCUSSION

Rule 2004 of the Federal Rules of Bankruptcy Procedure authorizes the Court, on application by a party in interest, to order the examination of any entity. The Chase Trust is investigating Socotra’s involvement in making loans to KS Mattson Partners, LP, specifically, the Napa Street Property. The Chase Trust desires to examine Socotra to determine the validity of its loan and lien on the Napa Street Property.

III.
REASONS FOR EX PARTE RELIEF

The Chase Trust seeks this order on an ex parte basis to expedite the review of the documents to allow this case to proceed as expeditiously as possible.

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IV.
REQUEST FOR RELIEF

Wherefore, the Chase Trust requests an order authorizing it to examine Socotra under Rule 2004 of the Federal Rules of Bankruptcy Procedure, and to request production of documents pursuant to a subpoena issued under Federal Rule of Civil Procedure 45.

DATED: October 16, 2025

WILKE FLEURY LLP

By:



DANIEL L. EGAN

Attorneys for CHASE 1992 FAMILY TRUST