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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re LEFEVER MATTSON, a California corporation, et al, 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 WALKER AND DUNLOP, LLC**
In re KS MATTSON PARTNERS, LP, Debtor,	The Hon. Charles D. Novack

THE CHASE 1992 FAMILY TRUST (the "Chase Trust") submits this ex parte application for an order authorizing an examination of WALKER & DUNLOP, LLC ("Walker & Dunlop"), including the subpoena of documents, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure.

I. FACTS

On or about August 29, 2024, debtor Live Oak Investments, LP ("Live Oak"), sold its sole asset, the property located at 410 Buck Avenue, Vacaville, CA ("Southwood Apartments"). In connection with the closing, and through escrow, Live Oak paid the sum of $6,718,000.00 to Walker

& Dunlop, purportedly to satisfy a loan secured by the real estate. The sale of Southwood Apartments closed less than two weeks before Live Oak filed this present bankruptcy. The Chase Trust seeks to examine Walker & Dunlop regarding the validity of the underlying obligation purportedly owed to Walker & Dunlop, and potential affirmative claims against Walker & Dunlop for avoidance and recovery of the payment. 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 a limited partner in Live Oak. The Chase Trust took the deposition of Bradly Sharp, Debtor's Chief Restructuring Officer, on September 22, 2025. Mr. Sharp confirmed he has not investigated the validity of Walker & Dunlop's lien on the Southwood Apartments.

> Q So at the time of the bankruptcy -- or at the time of these payments that were made out of Live Oak funds to LeFever Mattson and Home Tax Services and Walker and Dunlap, you felt that if they were improper, they would have been returned in full?
>
> MR. TAYLOR: Object to the form.
>
> THE WITNESS: Well, you're mixing a bunch of things. The Walker and Dunlap, I have not reviewed their lien. I'm presuming they had a valid lien. I have not reviewed that. That was paid out of escrow.

As demonstrated by Mr. Sharp's testimony, it is apparent Mr. Sharp has not investigated the validity of Walker & Dunlop's lien. As this transaction involves millions of dollars that could potentially be avoided and recovered for the estate, the Chase Trust believes an examination under Rule 2004 is of great importance. An examination under Rule 2004 will allow the Chase Trust to thoroughly review the validity of Walker & Dunlop's lien on the Southwood Apartments and to assess whether claims against Walker & Dunlop exist.

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III.
REASONS FOR EX PARTE RELIEF

CHASE 1992 FAMILY TRUST seeks this order on an ex parte basis to expedite the review of the documents.

IV.
REQUEST FOR RELIEF

Wherefore, the Chase Trust requests an order authorizing it to examine Walker & Dunlop 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

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