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

In re
 LEFEVER MATTSON,
 a California corporation, *et al.*,¹
 Debtors.

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

In re
 KS MATTSON PARTNERS, LP,²
 Debtor.

**EX PARTE APPLICATION OF THE
 OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS FOR ENTRY
 OF AN ORDER PURSUANT TO
 BANKRUPTCY RULE 2004
 AUTHORIZING ORAL EXAMINATION
 OF AND PRODUCTION OF
 DOCUMENTS BY YOUTH FOR CHRIST
 MINISTRIES SACRAMENTO;
 DECLARATION OF GILLIAN N.
 BROWN, ESQ.**

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

² The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210. Solana Beach, CA 92075.



1 The Official Committee of Unsecured Creditors (the “Committee”) appointed in the
2 above-captioned chapter 11 bankruptcy cases (the “Cases”) hereby files this *ex parte* application
3 (the “Application”) under Federal Rule of Bankruptcy Procedure 2004 (“Rule 2004”) and Local
4 Bankruptcy Rule 2004-1 (“Local Rule 2004-1”) for entry of an order authorizing the Committee to
5 issue a subpoena to **Youth for Christ Ministries Sacramento** (“YCM”).

6 The Committee’s proposed subpoena will provide that YCM shall (a) complete its
7 production, by **November 7, 2025**, of documents responsive to the Requests for Production (the
8 “Requests”) set forth substantially in the form attached hereto as **Exhibit 1**, and (b) provide oral
9 testimony (the “Oral Testimony”), on a mutually agreed date no later than **November 21, 2025**
10 (unless the Committee and YCM agree to extend that date) relating to (i) YCM’s search for and
11 possession, custody, or control of documents responsive to the Requests; and (ii) the subject
12 matter of the Requests.

13 **I. PRELIMINARY STATEMENT**

14 By this Application, the Committee seeks to take discovery of YCM, a California religious
15 non-profit organization of which Timothy LeFever is currently a member of the board of directors.
16 The Committee is looking to uncover information that may lead to recovery of property of the
17 estate for the benefit of creditors. YCM describes itself on its website as “a movement that reaches
18 young people everywhere with the hope of Christ. We work with the local church and other like-
19 minded partners to raise up lifelong followers of Jesus who lead by their godliness in lifestyle,
20 devotion to the Word of God and prayer, passion for sharing the love of Christ, and commitment
21 to social involvement.”

22 Debtor LFM’s Statement of Financial Affairs, attachment 9 (“Certain Gifts and Charitable
23 Contributions”) [Doc. 292-1], details \$75,000.00 in payments to YCM, each in the amount of
24 \$5,000.00 made monthly between October 2022 and December 2023. The Committee’s discovery
25 is targeted to uncover information about those gifts and potentially undisclosed, avoidable
26 transfers of Debtors’ assets to YCM.

27 As set forth in the First-Day Declaration of Bradley Sharp, the Chief Restructuring Officer
28 of Debtor LFM and its affiliated debtors and debtors in possession (together, the “LFM Debtors”),

Kenneth Mattson – one of LFM’s founders and former principal - “appears to have used LeFever Mattson to facilitate a years-long campaign of self-serving transactions, many of which were not recorded in the books and records of the LFM Debtors or any of their associated LPs or LLCs (collectively, the “Self-Serving Transactions”).”³ The Committee’s professionals have been conducting an investigation (the “Committee Investigation”) into the Self-Serving Transactions, and other potential claims and causes of action that may be asserted against non-Debtors.

Timothy LeFever, along with Mr. Mattson, was a founder and co-principal of LFM. Because of Mr. LeFever’s position as a YCM board member and documented LFM gifts to YCM in the two years prepetition while Self-Serving Transactions depleted the Debtors’ assets to the detriment of their unsecured creditors, the Committee seeks information regarding all of the Debtors’ assets that were improperly transferred to YCM.

II. BACKGROUND OF THE BANKRUPTCY CASES

Over the course of two months in 2024,⁴ each of the LFM Debtors filed a voluntary petition for relief in this Court under chapter 11 of the Bankruptcy Code. The United States Trustee appointed the Committee in the LFM Debtors’ bankruptcy cases on October 9, 2024.⁵ On November 22, 2024, Debtor KS Mattson Partners, LP (“KSMP”) became subject to an involuntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2024, the Court entered the *Stipulated Order for Relief in an Involuntary Case* [Docket No. 131] relating to KSMP and subsequently appointed Robbin L. Itkin as the Responsible Individual in that chapter 11 case, effective as of June 16, 2025. *See* Docket No. 172. On November 1, 2024, the Court granted the application of the Committee in the LFM Debtors’ bankruptcy cases to employ Pachulski Stang Ziehl & Jones LLP (“PSZJ”) as its counsel, effective as of October 13, 2024.⁶ On

³ *See Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 5] (the “First-Day Decl.”), ¶ 27.

⁴ The LFM Debtors filed bankruptcy petitions on August 6, 2024; September 12, 2024; and October 2, 2024 (collectively, the “Petition Dates”).

⁵ *See* Docket No. 135.

⁶ *See* Docket No. 250.

1 August 26, 2025, the United States Trustee amended the Committee's members for the second
2 time, rendering PSZJ counsel to the Committee in the KSMP chapter 11 case, as well. *See* Docket
3 No. 2104.

4 **III. JURISDICTION**

5 This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§
6 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before
7 this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought
8 herein are §§ 1103 and 1109(b) of the Bankruptcy Code, and Rule 2004.

9 **IV. RELIEF REQUESTED**

10 The Committee respectfully requests that the Court enter an *ex parte* order authorizing the
11 Committee to issue a subpoena requiring YCM to (a) complete its production, by **November 7,**
12 **2025**, of documents responsive to the Requests set forth substantially in the form attached hereto
13 as **Exhibit 1**, and (b) provide Oral Testimony, on a mutually agreed date no later than **November**
14 **21, 2025** (unless the Committee and YCM agree to extend that date) relating to (i) YCM's search
15 for and possession, custody, or control of documents responsive to the Requests; and (ii) the
16 subject matter of the Requests.

17 **IV. BASIS FOR RELIEF**

18 Local Rule 2004-1 provides as follows: "The Clerk may issue on behalf of the Court, *ex*
19 *parte* and without notice, orders granting applications for examination of an entity pursuant to
20 Bankruptcy Rule 2004(a)."⁷ The Committee brings this Application *ex parte* pursuant to Local
21 Rule 2004-1 seeking an order without need for a hearing. The Committee understands that YCM
22 reserves the right to interpose objections to the underlying document requests after the issuance of
23 the subpoena. However, objections to the underlying document requests are not grounds to oppose
24 or delay the granting of this Application.

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⁷ L.B.R. 2004-1(a).

1 Rule 2004(a) provides that “[o]n motion of any party in interest, the court may order the
2 examination of any entity.”⁸ Rule 2004 is primarily used for “revealing the nature and extent of
3 the bankruptcy estate, and for discovering assets, examining transactions, and determining whether
4 wrongdoing has occurred.”⁹

5 Pursuant to Rule 2004(b), a party in interest may seek both document and oral discovery
6 related to “acts, conduct, or property or to the liabilities and financial condition of the debtor, or to
7 any matter which may affect the administration of the debtor’s estate, or to the debtor’s right to a
8 discharge.”¹⁰ Under Rule 2004(c), the “attendance of an entity for examination and for the
9 production of documents . . . may be compelled as provided in Rule 9016 for the attendance of a
10 witness at a hearing or trial.”¹¹ Federal Rule of Bankruptcy Procedure (“Bankruptcy Rule”) 9016
11 makes Rule 45 of the Federal Rules of Civil Procedure (governing subpoenas) applicable in cases
12 under the Bankruptcy Code. Unlike discovery under the Federal Rules of Civil Procedure (the
13 “Civil Rules”), discovery under Rule 2004 can be a “pre-litigation discovery device.”¹² As such, a
14 Rule 2004 motion need not be tied to specific factual allegations at issue between parties.¹³
15 Moreover, the scope of a Rule 2004 oral examination is broader than that of discovery under the
16 Civil Rules or the Bankruptcy Rules governing adversary proceedings.¹⁴ In fact, courts have

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19 ⁸ Fed. R. Civ. P. 2004(a).

20 ⁹ *In re Kelton*, 389 B.R. 812, 820 (Bankr. S.D. Ga. 2008); *see also In re Lufkin*, 255 B.R. 204, 208 (Bankr. E.D. Tenn.
21 2000) (purpose of Rule 2004 is to “determine the condition, extent, and location of the debtor’s estate in order to
22 maximize distribution to unsecured creditors”); *In re Bennett Funding Grp., Inc.*, 203 B.R. 24, 28 (Bankr. N.D.N.Y.
1996) (purpose of Rule 2004 is to assist in “revealing the nature and extent of the estate, and to discover assets of the
debtor which may have been intentionally or unintentionally concealed”).

23 ¹⁰ Fed. R. Civ. P. 2004(b).

24 ¹¹ Fed. R. Civ. P. 2004(c).

25 ¹² *In re Wilson*, 413 B.R. 330, 336 (Bankr. E.D. La. 2009).

26 ¹³ *In re Symington*, 209 B.R. 678, 683 (Bankr. D. Md. 1997) (Bankruptcy Rule 2004 permits “examination of any party
without the requirement of a pending adversary proceeding or contested matter”).

27 ¹⁴ *In re Ecam Publ’ns, Inc.*, 131 B.R. 556, 559 (Bankr. S.D.N.Y. 1991); *see also In re Drexel Burnham Lambert Grp.,*
28 *Inc.*, 123 B.R. 702, 711 (Bankr. S.D.N.Y. 1991) (“[T]he scope of a Rule 2004 examination is very broad. Rule 2004
discovery is broader than discovery under the Federal Rules of Civil Procedure.”).

1 recognized that Rule 2004 examinations may be “broad” and “unfettered,” and can legitimately be
2 in the nature of a “fishing expedition.”¹⁵

3 Whether to allow the requested discovery rests within the sound discretion of the Court.¹⁶
4 Bankruptcy courts may allow a Rule 2004 examination of “third parties who have had dealings
5 with the debtor,”¹⁷ “to allow inquiry into the debtor’s acts, conduct or financial affairs so as to
6 discover the existence or location of assets of the estate,”¹⁸ “unearthing frauds,”¹⁹ or to assist in
7 recovering assets for the benefit of a debtor’s creditors.²⁰

8 In addition, section 105(a) of the Bankruptcy Code authorizes the Court to “issue any
9 order . . . that is necessary or appropriate to carry out the provisions of this title.”²¹ The proposed
10 discovery will, among other things, assist the Committee to fulfill its statutory duty to “investigate
11 the acts, conduct, assets, liabilities, and financial condition of the debtor.”²² The relief requested in
12 this Application will not reduce or expand the substantive rights of any party to object to or
13 modify the information requested by the Committee.

14 Here, the requested relief is well within the scope of Rule 2004. The Committee seeks to
15 maximize the amount of creditors’ recoveries in this Cases. As such, the Committee needs the

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17 ¹⁵ *In re Subpoena Duces Tecum & Ad Testificandum Pursuant to Fed. R. Bankr. P. 2004*, 461 B.R. 823, 829 (Bankr.
18 C.D. Cal. 2011) (citation omitted); *see also In re Countrywide Home Loans, Inc.*, 384 B.R. 373, 400 (Bankr. W.D. Pa.
19 2008); *In re Bennett Funding Grp.*, 203 B.R. at 28 (purpose of Rule 2004 is to assist in “revealing the nature and extent
of the estate, and to discover assets of the debtor which may have been intentionally or unintentionally concealed”); *In*
re Valley Forge Plaza Assocs., 109 B.R. 669, 674 (Bankr. E.D. Pa. 1990).

20 ¹⁶ *See, e.g., In re Hammond*, 140 B.R. 197, 200 (S.D. Ohio 1992).

21 ¹⁷ *In re Fearn*, 96 B.R. 135, 138 (Bankr. S.D. Ohio 1989); *see also In re W&S Invs., Inc.*, No. 91-35830, 1993 U.S.
App. LEXIS 2231, at *5-6 (9th Cir. Jan. 28, 1993) (unpublished disposition) (Rule 2004 is a “broadly construed
discovery device which permits any party in interest in a bankruptcy proceeding to move for a court order to examine
any entity...,” the “scope of inquiry permitted under a Rule 2004 examination is generally very broad and can
‘legitimately be in the nature of a ‘fishing expedition.’”) (citation omitted).

23 ¹⁸ *In re Dinubilo*, 177 B.R. 932, 940 (E.D. Cal. 1993).

24 ¹⁹ *Dynamic Fin. Corp. v. Kipperman (In re N. Plaza, LLC)*, 395 B.R. 113, 122 n.9 (S.D. Cal. 2008) (citations omitted).

25 ²⁰ *See In re Vantage Petroleum Corp.*, 34 B.R. 650, 651 (Bankr. E.D.N.Y. 1983) (allowing discovery under Rule 2004
26 to help the debtor “discover and recover assets for benefit of creditors of the debtor”).

27 ²¹ 11 U.S.C. § 105(a).

28 ²² *Id.* § 1103(c)(2).

1 information from YCM pertaining to the identity of as yet unknown investors/unsecured creditors;
2 potential claims for relief against Mr. LeFever and/or YCM; and the Debtors' assets, liabilities,
3 and operations.

4 **V. NO PRIOR REQUEST**

5 No prior request for the relief sought in this Application has been made to this or any other
6 Court.

7 **VI. NOTICE**

8 Local Rule 2004-1 provides that this Application can be brought "ex parte and without
9 notice." L.B.R. 2004-1(a). Nevertheless, notice of this Application will be provided to (a) YCM via
10 U.S. Mail; (b) the Office of the United States Trustee – via ECF; (c) counsel to the Debtors – via
11 ECF; and (d) all other ECF recipients.

12 **VII. CONCLUSION**

13 For the reasons set forth above, the Committee respectfully requests that the Court grant
14 this Application. A proposed order granting this Application is attached hereto as **Exhibit 3**.

15
16 Dated: October 20, 2025

PACHULSKI STANG ZIEHL & JONES LLP

17
18 By /s/ Gillian N. Brown

19 Debra I. Grassgreen

20 John D. Fiero

21 Jason H. Rosell

22 Steven W. Golden

23 Gillian N. Brown

24 *Counsel to the Official Committee of Unsecured*
25 *Creditors*
26
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EXHIBIT 1
Requests for Production of Documents

DEFINITIONS

1. “ALL” shall be construed as encompassing “EACH” and “ANY”.
2. “ANY” shall be construed as encompassing “EACH” and “ALL”.
3. “COMMITTEE” means the Official Committee of Unsecured Creditors appointed in the CHAPTER 11 CASES.
4. “COMMUNICATION” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
5. “CONCERNING” means relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, approving, authorizing, constituting, describing, identifying, referring to, referencing, discussing, indicating, connected with or otherwise pertaining in ANY way, in whole or in part, to the subject matter being referenced.
6. “DOCUMENT” is synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS.
7. “EACH” shall be construed as encompassing “ALL” and “ANY”.
8. “ENTITY” shall have the meaning ascribed to such term in 11 U.S.C. § 101(15).
9. “IDENTIFIED ENTITY” means ANY ENTITY identified on the attached Appendix 3 and such IDENTIFIED ENTITY’s agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, partners, representatives, affiliates, subsidiaries, predecessors, and/or successors.
10. “IDENTIFIED PROPERTY” means ANY real property identified on the attached Appendix 2.

11. “IDENTIFY”

- a. *With respect to PERSONS:* When referring to a PERSON, “to identify” means to give, to the extent known, the PERSON’s full name, present or last known address; and when referring to a natural person, additionally, the present or last known place of employment. Once a PERSON has been identified in accordance with this definition, only the name of that PERSON need be listed in response to subsequent discovery requesting the IDENTIFICATION of that person.
- b. *With respect to DOCUMENTS:* When referring to DOCUMENTS, “to identify” means to give, to the extent known, the (i) type of DOCUMENT; (ii) general subject matter; (iii) date of the DOCUMENT; and (iv) author(s), addressee(s) and recipient(s). In the alternative, YOU may produce the DOCUMENTS, together with identifying information sufficient to satisfy Federal Rule of Civil Procedure 33(d).

12. “INCLUDING” means “including, without limitation” and “including, but not limited to”.

13. “LFM DEBTORS” means individually and collectively, EACH of the ENTITIES listed on Appendix 1 hereto, and EACH of their agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.

14. “LEFEVER” means Timothy LeFever and his agents, accountants, financial advisors, attorneys, employees, representatives, and/or family members. Without limitation, LEFEVER includes the law firm of, and lawyers or employees at, Coblenz Patch Duffy & Bass LLP.

15. “KSMP” means Debtor KS Mattson Partners, LP, a debtor in the above-captioned cases, and ANY of its agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect shareholders, members, partners, representatives, affiliates, subsidiaries, predecessors, and/or successors.

7 18. “REAL PROPERTY” means land and immovable property on land, such as
8 buildings.

10 20. “YOU” and “YOUR” means Youth for Christ Ministries Sacramento and its
11 agents, accountants, financial advisors, attorneys, employees, officers, directors, direct or indirect
12 shareholders, members, representatives, affiliates, subsidiaries, predecessors, and/or successors.

14 A. Unless otherwise specified, the REQUESTS seek DOCUMENTS dated or created on and
15 after **August 6, 2020**.

18 C. Please bates number EACH page of EACH DOCUMENT that YOU produce.

21 E. In the REQUEST, the use of the singular form of ANY word includes the plural and vice
22 versa. The words “and” and “or” shall both be conjunctive and disjunctive.

26 || 1. The date of the DOCUMENT:

28 3. The name, address, telephone number and title of the author(s) of the

- 1 DOCUMENT;
- 2 4. The name, address, telephone number and work title of EACH recipient of the
- 3 DOCUMENT;
- 4 5. The number of pages in the DOCUMENT;
- 5 6. The document control number, if ANY;
- 6 7. The present location(s) of the DOCUMENT and the name, address and telephone
- 7 number of the person(s) who has/have possession of the DOCUMENT;
- 8 8. A specific description of the subject matter of the DOCUMENT;
- 9 9. The reason why YOU cannot produce the DOCUMENT.
- 10 G. YOU are under a continuing duty to amend YOUR written responses to the REQUESTS
- 11 and to produce additional DOCUMENTS if the written responses or document production
- 12 is incomplete or incorrect in ANY material respect, and if the additional or corrective
- 13 information has not otherwise been made known to the COMMITTEE.
- 14 H. YOU are required to produce the full and complete originals (in native format, if
- 15 electronic), or copies if the originals are unavailable, of EACH DOCUMENT responsive to
- 16 the REQUESTS along with ALL non-identical copies and drafts in their entirety. A copy
- 17 may be produced in lieu of originals if the entirety (front and back where appropriate) of the
- 18 DOCUMENT is reproduced and YOU state by declaration under penalty of perjury that the
- 19 copy provided is a true, correct, complete, and accurate duplication of the original.
- 20 I. Produced DOCUMENTS must include ALL exhibits, attachments, and ANY other
- 21 DOCUMENTS otherwise appended to another DOCUMENT.
- 22 J. For ELECTRONICALLY STORED INFORMATION (“ESI”):
- 23 1. Produce DOCUMENTS in accordance with the instructions at
- 24 [https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-](https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data)
- 25 [Processed-Data](https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data)
- 26 2. Produce ESI in its native format.
- 27 3. Maintain family integrity.
- 28 4. Perform custodian-level de-duplication.

- 1 5. Produce a DAT load file with the following metadata fields: Beginning Production
2 Number, Ending Production Number, Beginning Attachment Number, End
3 Attachment Number, Family ID, Page Count, Custodian, Original Location Path,
4 Email Folder Path, Document Type, Doc Author, Doc Last Author, Comments,
5 Categories, Revisions, File Name, File Size, MD5 Hash, Date Last Modified, Time
6 Last Modified, Date Created, Time Created, Date Last Accessed, Time Last
7 Accessed, Date Sent, Time Sent, Date Received, Time Received, To, From, CC,
8 BCC, Email Subject, Path to Native, Path to Full Text, Original Time Zone.
- 9 6. Process ESI in Pacific Time Zone and provide a metadata field indicating original
10 time zone.
- 11 K. If YOU withhold or redact a portion of ANY DOCUMENT under a claim of privilege or
12 other protection, then the DOCUMENT must be identified on a privilege log, which shall
13 be produced contemporaneously with the non-privileged DOCUMENTS responsive to this
14 REQUEST, and which privilege log shall state the following information:
 - 15 1. The date of the DOCUMENT;
 - 16 2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
 - 17 3. The name, address, telephone number and title of the author(s) of the
18 DOCUMENT;
 - 19 4. The name, address, telephone number and work title of EACH recipient of the
20 DOCUMENT;
 - 21 5. The number of pages in the DOCUMENT;
 - 22 6. The document control number, if ANY;
 - 23 7. The present location(s) of the DOCUMENT and the name, address and telephone
24 number of the person(s) who has/have possession, custody, or control of the DOCUMENT;
 - 25 8. A general description of the subject matter of the DOCUMENT or the portion
26 redacted without disclosing the asserted privileged or protected COMMUNICATION;
 - 27 9. The specific privilege(s) or protection(s) that YOU contend applies.
- 28

1 **REQUESTS FOR PRODUCTION**

2
3 **REQUEST FOR PRODUCTION NO. 1:**

4 DOCUMENTS sufficient to IDENTIFY all members of YOUR Board of Directors/Board
5 of Trustees, and any committees and subcommittees of the Board at all times since August 6,
6 2020.

7 **REQUEST FOR PRODUCTION NO. 2:**

8 DOCUMENTS sufficient to IDENTIFY all of YOUR employees at all times since August
9 6, 2020.

10 **REQUEST FOR PRODUCTION NO. 3:**

11 ALL DOCUMENTS CONCERNING (i) KSMP and/or (ii) ANY of the LFM DEBTORS
12 listed on Appendix 1, attached including, but not limited to, any transfers of REAL PROPERTY,
13 money, or other personal between YOU and (i) KSMP and/or (ii) ANY of the LFM DEBTORS.
14 This REQUEST includes, but is not limited to, DOCUMENTS CONCERNING the \$5000.00
15 monthly payments from DEBTOR LeFever Mattson to YOU each month between October 2022
16 and December 2023.

17 **REQUEST FOR PRODUCTION NO. 4:**

18 ALL DOCUMENTS CONCERNING ANY of the IDENTIFIED PROPERTIES listed on
19 Appendix 2, attached.

20 **REQUEST FOR PRODUCTION NO. 5:**

21 ALL DOCUMENTS CONCERNING ANY of the IDENTIFIED ENTITIES listed on
22 Appendix 3, attached.

23 **REQUEST FOR PRODUCTION NO. 6:**

24 ALL DOCUMENTS CONCERNING ANY transfers of REAL PROPERTY or personal
25 property BETWEEN YOU, on the one hand, and MATTSON and/or LEFEVER, on the other
26 hand.

27 **REQUEST FOR PRODUCTION NO. 7:**

28 YOUR IRS Form 990s for 2019 through 2025.

Appendix 1 – Debtors

Debtor Name	Petition Date	Tax ID	Case No.
Apan Partners LLC	9/12/2024	N/A	24-10487
Autumn Wood I, LP	9/12/2024	20-0164208	24-10488
Bay Tree, LP	9/12/2024	82-1071378	24-10489
Beach Pine, LP	9/12/2024	83-2643272	24-10490
Bishop Pine, LP	9/12/2024	83-2643038	24-10491
Black Walnut, LP	9/12/2024	47-2451858	24-10492
Buck Avenue Apartments, LP	9/12/2024	54-2090323	24-10493
Buckeye Tree, LP	9/12/2024	88-2980108	24-10494
Bur Oak, LP	9/12/2024	87-4699497	24-10495
Butcher Road Partners, LLC	9/12/2024	45-5159521	24-10496
California Investment Properties, a California corporation	9/12/2024	30-0289474	24-10543
Cambria Pine, LP	9/12/2024	83-2644771	24-10497
Chestnut Oak, LP	9/12/2024	87-4702239	24-10498
Country Oaks I, LP	9/12/2024	26-0860694	24-10499
Divi Divi Tree, L.P.	9/12/2024	71-0926806	24-10500
Douglas Fir Investments, LP	9/12/2024	47-4674444	24-10501
Firetree I, LP	9/12/2024	82-3519393	24-10502
Firetree II, LP	9/12/2024	82-3519554	24-10503
Firetree III, LP	9/12/2024	82-3919655	24-10504
Foxtail Pine, LP	9/12/2024	83-2643197	24-10505
Ginko Tree, LP	9/12/2024	88-2960976	24-10506
Golden Tree, LP	9/12/2024	82-1060045	24-10507
Hagar Properties, LP	9/12/2024	04-3598044	24-10508
Heacock Park Apartments, LP	9/12/2024	46-3737509	24-10509
Home Tax Service of America, Inc., dba LeFever Mattson Property Management	9/12/2024	68-0262554	24-10544
LeFever Mattson I, LLC	9/12/2024	47-4960075	24-10510
LeFever Mattson, a California corporation	9/12/2024	68-0197537	24-10545
Live Oak Investments, LP	9/12/2024	47-3786181	24-10511
Monterey Pine, LP	9/12/2024	83-2644824	24-10512
Napa Elm, LP	9/12/2024	54-2090332	24-10513
Nut Pine, LP	9/12/2024	83-2661795	24-10514
Pinecone, LP	9/12/2024	84-2395880	24-10515
Pinewood Condominiums, LP	10/2/2024	54-2090329	24-10598
Ponderosa Pines, LP	10/2/2024	N/A	24-10599
Red Cedar Tree, LP	9/12/2024	88-3572519	24-10517
Red Mulberry Tree, LP	9/12/2024	88-3572594	24-10518

Debtor Name	Petition Date	Tax ID	Case No.
Red Oak Tree, LP	9/12/2024	92-1008382	24-10520
Red Oak, LP	9/12/2024	61-2022650	24-10519
Red Spruce Tree, LP	9/12/2024	92-0780568	24-10521
Redbud Tree, LP	9/12/2024	88-2961999	24-10516
River Birch, LP	9/12/2024	86-3020630	24-10522
River Tree Partners, LP	9/12/2024	81-3671554	24-10523
River View Shopping Center 1, LLC	9/12/2024	47-4186147	24-10524
River View Shopping Center 2, LLC	9/12/2024	47-4186476	24-10525
RT Capitol Mall, LP	9/12/2024	81-3775896	24-10526
RT Golden Hills, LP	9/12/2024	81-3708073	24-10527
Scotch Pine, LP	9/12/2024	86-3043628	24-10528
Sequoia Investment Properties, LP	9/12/2024	32-0136044	24-10529
Sienna Pointe, LLC	9/12/2024	47-4712579	24-10530
Spruce Pine, LP	9/12/2024	84-2396399	24-10532
Tradewinds Apartments, LP	9/12/2024	54-2090326	24-10533
Vaca Villa Apartments, LP	9/12/2024	54-2090327	24-10534
Valley Oak Investments, LP	9/12/2024	47-3383417	24-10535
Watertree I, LP	9/12/2024	82-3519819	24-10536
Willow Oak, LP	9/12/2024	87-4700495	24-10537
Windscape Apartments I, LP	9/12/2024	26-0860477	24-10538
Windscape Apartments II, LP	9/12/2024	26-0860509	24-10539
Windscape Apartments, LLC	9/6/2024	83-1597353	24-10417
Windscape Holdings, LLC	9/12/2024	83-1608759	24-10540
Windtree, LP	9/12/2024	82-4974654	24-10541
Yellow Poplar, LP	9/12/2024	86-3043392	24-10542

Appendix 2 – Identified Properties

Address	City	State	APN (if known)
200 Wagner Road	Sonoma	CA	128-461-023-000
23570 Arnold Dr			128-461-081-000
72 Wagner Road			128-461-082-000
100 Wagner Road			128-461-084-000
450 West Spain	Sonoma	CA	018-111-042-000
302/304/310 1st Street East	Sonoma	CA	018-171-019-000 018-171-031-000
171 W. Spain Street	Sonoma	CA	018-202-051-000
103/105 Commerce Court	Fairfield	CA	0044-090-490-000 0044-090-500-000
9407-9471 N Fort Washington Rd	Fresno	CA	401-830-01 401-830-02 401-830-03 401-830-04 401-830-05 401-830-06 401-830-07 401-830-08 401-830-09 401-830-10
2151 Salvio Street	Concord	CA	112-137-017-3
941-1017 Alamo Dr.	Vacaville	CA	0127-080-570 0127-080-340
1870 Thornsberry Rd	Sonoma	CA	127-192-056-000
Vineyard 8th Street E	Sonoma	CA	128-422-075-000
802 Studley St	Sonoma	CA	018-443-011-000
801 W. Napa St	Sonoma	CA	018-443-011-000
830-848 Studley St	Sonoma	CA	018-443-022-000
921 Broadway	Sonoma	CA	128-082-011-000
1383 Larkin Drive	Sonoma	CA	023-040-028-000
635 Broadway	Sonoma	CA	018-301-010-000
645-651 Broadway/10 Maple St	Sonoma	CA	018-301-009-000
1161-1167 Broadway	Sonoma	CA	128-181-029-000
1151 Broadway	Sonoma	CA	128-181-028-000
596 3rd St E	Sonoma	CA	018-271-037-000
446 3rd Street West	Sonoma	CA	018-201-003-000
454 3rd Street West	Sonoma	CA	018-201-004-000
789 Cordilleras	Sonoma	CA	023-010-069-000
110 Fordham Circle	Vallejo	CA	0068-243-020
905 Broadway St	Fairfield	CA	0030-282-190

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1621 Hood Rd	Sacramento	CA	285-0021-090-0000 285-0021-010-0000
5800 Engle Rd	Carmichael	CA	258-0180-043-0000
7575 Power Inn Rd	Sacramento	CA	051-0200-093 051-0467-052
7337 Power Inn Rd	Sacramento	CA	051-0231-014 051-0231-016 051-0231-015
1190 Dana Dr	Fairfield	CA	0033-042-400
1189 Dana Dr	Fairfield	CA	0033-042-300
1050 Elm St	Napa	CA	005-123-013-000
3310 Cimmarron Rd	Cameron Park	CA	116-311-001-000
3320 Cimmarron Rd			116-311-002-000
3336 Cimmarron Rd			116-311-003-000
500 Jackson St	Fairfield	CA	0030-244-130
501 - 523 Carpenter St; 1035 - 1037 Washington St	Fairfield	CA	0030-152-010
453 Fleming Ave E	Vallejo	CA	0069-222-010 0069-222-020
5800 Fair Oaks Blvd	Carmichael	CA	283-0050-034-0000
3217 Walnut Ave	Carmichael	CA	271-0313-030-000
170 - 182 1st Street East	Sonoma	CA	092-010-014-000 092-010-015-000
520 Capitol Mall	Sacramento	CA	006-146-031-000
6359 Auburn Blvd	Citrus Heights	CA	229-160-013-000
2280 Bates Ave	Concord	CA	159-070-015-700
19450 Old Winery Rd	Sonoma	CA	127-242-049-000
222-226 W. Spain St	Sonoma	CA	018-151-005-000
24265 Arnold Dr	Sonoma	CA	128-484-009-000
24321 Arnold Dr	Sonoma	CA	128-484-010-000
786 Broadway	Sonoma	CA	018-352-043-000
790 Broadway	Sonoma	CA	018-352-044-000
18580 Sonoma Highway	Sonoma	CA	056-501-059-000
453/457/459 2nd St W	Sonoma	CA	018-201-016-000
17700 Sonoma Highway	Sonoma	CA	056-303-025-000
1319-1361 Fulton Ave	Sacramento	CA	285-152-031-000
377 West Spain Street	Sonoma	CA	018-192-028-000
20564 Broadway	Sonoma	CA	128-321-008-000
653 3rd Street W	Sonoma	CA	018-283-005-000
391-455 Oak Street; 19173 Railroad Ave	Sonoma	CA	052-402-022-000

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19020 Railroad Ave. 19022 A&B Railroad Ave. 19030 Railroad Ave.	Sonoma	CA	052-351-028-000
8th St E	Sonoma	CA	128-381-027-000
21885 8th St E	Sonoma	CA	128-381-028-000
141-145 E. Napa Street	Sonoma	CA	018-261-006-000
151 E Napa Street	Sonoma	CA	018-261-023-000
241 1st Street West	Sonoma	CA	018-121-005-000
23250 Maffei Road	Sonoma	CA	128-461-009-000 128-471-012-000
20490 Broadway	Sonoma	CA	128-262-003-000
925-927 Broadway Street	Sonoma	CA	128-082-015-000
967 Broadway Street	Sonoma	CA	128-690-009-000
101 Meadowlark Lane	Sonoma	CA	128-484-013-000
24101 Arnold Drive	Sonoma	CA	128-484-003-000
24151 Arnold Drive	Sonoma	CA	128-484-024-000
310 Meadowlark	Sonoma	CA	128-484-014-000
201 Meadowlark	Sonoma	CA	128-484-033-000 128-484-034-000
16721 Sonoma Highway	Sonoma	CA	056-562-020-000
18585 Manzanita Road	Sonoma	CA	056-501-036-000
1130 Pear Tree Lane	Napa	CA	044-500-007-000
157 James River Road	Vallejo	CA	079-351-010-000
258 Lorraine Blvd.	San Leandro	CA	075-0171-013
533 Bella Vista Drive	Suisun City	CA	0174-234-200
5601 Walnut Avenue #4	Orangevale	CA	235-0420-053-0023
5701/5703 Orange Ave	Sacramento	CA	050-0411-002-0000
830 Illinois Street #1-4	Fairfield	CA	0030-312-100
1173 Araquipa Court	Vacaville	CA	0127-351-310
1191 Araquipa Court	Vacaville	CA	0127-351-340
1864 Quail Meadows Circle	Vacaville	CA	132-042-170-000
4920 Samo Lane	Fairfield	CA	0174-010-090
333 Wilkerson Ave.	Perris	CA	310-061-023
371 Wilkerson Ave.	Perris	CA	310-070-078
411 Wilkerson Ave.	Perris	CA	310-081-012
No Address	Perris	CA	310-070-077
19340 7th St E	Sonoma	CA	127-242-025-000

1	101 Quail Court	Truckee	CA	107-170-033-000
2	102 Quail Court	Truckee	CA	107-170-032-000
3	103 Quail Court	Truckee	CA	107-170-034-000
4	104 Quail Court	Truckee	CA	107-170-031-000
5	107 Quail Court	Truckee	CA	107-170-035-000
6	108 Quail Court	Truckee	CA	107-170-030-000
7	109 Quail Court	Truckee	CA	107-170-036-000
8	10335 Badger Lane	Truckee	CA	107-170-037-000
9	10298 Badger Lane	Truckee	CA	107-170-001-000
10	10300 Badger Lane	Truckee	CA	107-170-002-000
11	10306 Badger Lane	Truckee	CA	107-170-003-000
12	10308 Badger Lane	Truckee	CA	107-170-004-000
13	10316 Badger Lane	Truckee	CA	107-170-005-000
14	10318 Badger Lane	Truckee	CA	107-170-006-000
15	10326 Badger Lane	Truckee	CA	107-170-007-000
16	10328 Badger Lane	Truckee	CA	107-170-008-000
17	10333 Badger Lane	Truckee	CA	107-170-038-000
18	10334 Badger Lane	Truckee	CA	107-170-009-000
19	110 Quail Court	Truckee	CA	107-170-029-000
20	10336 Badger Lane	Truckee	CA	107-170-010-000
21	10342 Badger Lane	Truckee	CA	107-170-011-000
22	10344 Badger Lane	Truckee	CA	107-170-012-000
23	10350 Badger Lane	Truckee	CA	107-170-013-000
24	10352 Badger Lane	Truckee	CA	107-170-014-000
25	10358 Badger Lane	Truckee	CA	107-170-015-000
26	10360 Badger Lane	Truckee	CA	107-170-016-000
27	10366 Badger Lane	Truckee	CA	107-170-017-000
28	10368 Badger Lane	Truckee	CA	107-170-018-000
	10378 Badger Lane	Truckee	CA	107-170-019-000
	10379 Badger Lane	Truckee	CA	107-170-028-000
	10380 Badger Lane	Truckee	CA	107-170-020-000
	10381 Badger Lane	Truckee	CA	107-170-027-000
	10386 Badger Lane	Truckee	CA	107-170-021-000
	10388 Badger Lane	Truckee	CA	107-170-022-000
	10393 Badger Lane	Truckee	CA	107-170-026-000
	10394 Badger Lane	Truckee	CA	107-170-023-000
	10395 Badger Lane	Truckee	CA	107-170-025-000
	10396 Badger Lane	Truckee	CA	107-170-024-000

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Pinyon Creek Common Area	Truckee	CA	107-170-039-000 107-170-040-000 107-170-041-000
<i>Intentionally Omitted</i>			
2030 E Grayson Rd	Ceres	CA	041-032-023-000
9120 Polhemus Drive/9300 Mazatlan Way	Elk Grove	CA	125-0203-016-0000
7210/7212 Grady Drive	Citrus Heights	CA	243-0311-020-0000
7300 Berna/7325 Arleta	Sacramento	CA	050-0412-004-0000
7303/7305 Berna Way	Sacramento	CA	050-0411-009-0000
7304/7306 Arleta Court	Sacramento	CA	050-0411-014-0000
7308/7310 Arleta Court	Sacramento	CA	050-0411-015-0000
7312/7314 Berna Way	Sacramento	CA	050-0412-007-0000
7316/7318 Arleta Court	Sacramento	CA	050-0411-017-0000
7319 Arleta/7301 Berna	Sacramento	CA	050-0411-005-0000
7320/7322 Arleta Court	Sacramento	CA	050-0411-018-0000
7319/7321 Berna Way	Sacramento	CA	050-0411-005-0000
7324/7326 Arleta Court	Sacramento	CA	050-0411-019-0000
7327/7329 Berna Way	Sacramento	CA	050-0411-003-0000
7328/7330 Arleta Court	Sacramento	CA	050-0411-020-0000
7332/7334 Arleta Court	Sacramento	CA	050-0411-021-0000
7339/7341 Arleta Court	Sacramento	CA	050-0412-002-0000
6346/6348 Sorrell Court	Citrus Heights	CA	209-0380-032-0000
5509 Orange Ave/7343 Arleta	Sacramento	CA	050-0412-001-0000
5513/5515 Missie Way	Sacramento	CA	228-0520-015-0000
5521/5523 Missie Way	Sacramento	CA	228-0520-017-0000
5335/5337 Gibbons Drive	Carmichael	CA	258-0191-033-0000
5537/5539 Missie Way	Sacramento	CA	228-0520-021-0000
5605 Orange Avenue/7320 Berna Way	Sacramento	CA	050-0412-008-0000
5601/5603 Orange Avenue	Sacramento	CA	050-0412-009-0000
7335/7337 Arleta Court	Sacramento	CA	050-0412-003-0000
430 W. Spain Street	Sonoma	CA	018-111-059-000
400 West Spain	Sonoma	CA	018-111-058-000
370 Butcher Rd	Vacaville	CA	127-070-310
280 Butcher Road	Vacaville	CA	127-070-410
310 Butcher Road	Vacaville	CA	127-070-300

1	312 Butcher Road	Vacaville	CA	127-431-200
2	350 Butcher Road	Vacaville	CA	127-070-030
3	7456 Foothills Blvd	Roseville	CA	477-100-031-000
4	4950 Allison Parkway	Vacaville	CA	0133-330-020
	4960 Allison Parkway			0133-330-030
	4970 Allison Parkway			0133-330-040
5	18935 5th St W	Sonoma	CA	127-101-018-000
6	430 West Napa	Sonoma	CA	018-193-048-000
7	446 W. Napa	Sonoma	CA	018-193-041-000
8	454 W. Napa	Sonoma	CA	018-193-040-000
9	462 W. Napa	Sonoma	CA	018-193-039
10	24160 Turkey Rd/24237 Arnold Rd.	Sonoma	CA	128-484-066-000
				128-484-067-000
11	1025 Napa St	Sonoma	CA	126-032-037-000
12	900 E Napa St	Sonoma	CA	127-231-040-000
13	424 2nd St W	Sonoma	CA	018-202-002-000
14	24120 Arnold Dr	Sonoma	CA	128-461-029-000
15	525 W Napa	Sonoma	CA	018-530-054-000
16	520/530/532 Studley St	Sonoma	CA	018-530-014-000
17	18701 Gehricke Road	Sonoma	CA	127-051-073-000
				127-051-074-000
18	1045 Bart Rd	Sonoma	CA	127-051-059-000
19	5818 Engle Rd	Carmichael	CA	258-0810-014
20	8340 / 8350 Auburn Boulevard	Citrus Heights	CA	204-0461-042
21	1716 Oceanfront	Del Mar	CA	299-232-09-00
22	1549 E Napa St	Sonoma	CA	127-312-059-000
23	476 W Spain St	Sonoma	CA	018-111-032-000
24	19357 Hwy 12	Sonoma	CA	
25	18590 Hwy 12	Sonoma	CA	
26	18275 Hwy 12	Sonoma	CA	
27	18010 Hwy 12	Sonoma	CA	
28	452 1st St E #C	Sonoma	CA	018-790-003-000
	450 1st St E #J	Sonoma	CA	018-790-018-000
	450 1st St E #ABK	Sonoma	CA	
	22 Boyes Blvd	Boyes Hot Springs	CA	056-402-001-000
	414 W Napa St	Sonoma	CA	018-193-047-000

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			0080-380-030
			0080-380-040
			0080-380-050
			0080-380-060
5200-5234 Gateway Plaza	Benicia	CA	
4321 1st St	Pleasanton	CA	094-0106-004-04
			300-331-14-01
531-533 Camino Del Mar	Del Mar	CA	300-331-14-02
1819 Coast Blvd	Del Mar	CA	299-144-13-00
62 Farragut Ave	Piedmont	CA	51-4786-7
62 Farragut Ave	Piedmont	CA	51-4786-8
210 La Salle	Piedmont	CA	
			051-4700-012
415 Pacific Ave	Piedmont	CA	051-4700-013
236 King Ave	Piedmont	CA	
3200 Castle Rd	Sonoma	CA	
3003 Castle Rd	Sonoma	CA	
969 Rachel Rd	Sonoma	CA	127-540-001
856 4th St E	Sonoma	CA	018-381-050
450 1st St E #G	Sonoma	CA	018-790-016
405 London Way	Sonoma	CA	
454 15th St	Del Mar	CA	299-280-29-00
1834/36 Ocean Front	Del Mar	CA	
1745 Grand Ave	Del Mar	CA	
157 26th St	Del Mar	CA	
23105 Millerick Rd	Sonoma	CA	
22666 Broadway	Sonoma	CA	128-422-040-000
1014 1st St W	Sonoma	CA	128-083-012
230 E Napa St	Sonoma	CA	128-222-009
68359 Jolon Rd	Bradley	CA	423-361-005-000
1220 E. Napa St.	Sonoma	CA	127-242-037
19179 Railroad Ave	Sonoma	CA	052-402-023
1200 Apple Tree Ct.	Sonoma	CA	127-242-035
1221 Apple Tree Ct.	Sonoma	CA	127-242-033
282 Patten St.	Sonoma	CA	018-262-023-000
320 East C Street	Dixon	CA	115-085-010
414 Manzanita Ave	Fairfield	CA	162-101-150
5120 Lovall Valley Loop Rd	Sonoma	CA	050-372-004-000
821 Lovall Valley Loop Rd	Sonoma	CA	127-171-012-000

1	528 Third St	Sonoma	CA	018-251-003
2	870 E. Napa St	Sonoma	CA	
3	19355 Seventh St E	Sonoma	CA	127-231-015
4	20470 Eighth St E	Sonoma	CA	
5	2 W. Spain St	Sonoma	CA	018-162-001 018-162-022
6	18285 Sonoma Highway	Sonoma	CA	
7	72 Moon Mountain Rd	Sonoma	CA	056-562-021-000
8	74 Moon Mountain Rd	Sonoma	CA	056-562-022-000
9	443 Casabonne Ln	Sonoma	CA	018-111-076
10	771 Fifth St E	Sonoma	CA	018-382-032
11	47 - 49 Natoma St	Folsom	CA	071-0310-009-0000 071-0310-001-0000
12	860 Charter Way	Redwood City	CA	054-081-010 054-081-140
13	1 - 22 Grande Circle	Fairfield	CA	0037-431-010 through 0037-431-230
14	410 Buck Avenue	Vacaville	CA	
15	2755 Baltic Drive	Fairfield	CA	0168-431-010
16	594 Lewis Court	Fairfield	CA	
17	5224 - 5226 Karm Way	Sacramento	CA	
18	2805 Yosemite Blvd	Modesto	CA	033-78-007
19	1881 Quail Meadows Circle	Vacaville	CA	
20	2787 Woodmont Drive	Fairfield	CA	
21	7340/7342 Arleta Ct	Sacramento	CA	050-0411-023
22	7315/7317 Arleta Ct	Sacramento	CA	050-0411-011
23	7336/7338 Arleta Ct	Sacramento	CA	050-0411-022
24	6024 Vista Ave	Sacramento	CA	
25	755 W. H St	Dixon	CA	0113-151-160
26	781 Beechwood Ave	Vallejo	CA	
27	9244/9246 Corinthian Cir	Sacramento	CA	
28	1435 Bell St	Sacramento	CA	
	33 Village Park Square	Bluffton	SC	R16-045-000-0148
				0028-750-240
				0028-750-260
				0028-750-270
				0028-750-250
				0028-750-290
	300 Chadbourne Rd	Fairfield	CA	0028-750-300
	1995 Grande Circle	Fairfield	CA	

1	5959 Riverside Blvd	Sacramento	CA	029-0021-045
2	724 Cottonwood St	Woodland	CA	
3	1841 Quail Meadows Circle	Vacaville	CA	0132-041-430
4	1111 Alaska Avenue	Fairfield	CA	0034-011-070
5				0131-030-880 0131-030-460 0131-030-470
6	555 Elmira Road	Vacaville	CA	
7	304 First St E	Sonoma	CA	018-171-030
8	333 E. Enos Drive	Santa Maria	CA	128-066-010
9	13325 Heacock Street	Moreno Valley	CA	296-103-026-3 296-103-025-2
10	3515 W. San Jose Avenue	Fresno	CA	415-044-25
11	4727 Hackberry Lane	Carmichael	CA	230-0221-016
12	1118 Araquipa Court	Vacaville	CA	0127-352-340
13	1214 Araquipa Court	Vacaville	CA	0127-352-220
14	1220 Araquipa Court	Vacaville	CA	0127-352-210
15	1209 Araquipa Court	Vacaville	CA	0127-351-360
16	1226 Araquipa Court	Vacaville	CA	0127-352-200
17	3557 Golf View Terrace	Santa Rosa	CA	147-410-020-000
18	4540 St. Andrews Court	Fairfield	CA	0147-161-010
19	1176 Castle Road	Sonoma	CA	127-111-055
20	1720-1722 The Strand	Manhattan Beach	CA	4178-005-007
21	1170 Castle Road	Sonoma	CA	127-111-054
22	1823/1825 Coast Blvd	Del Mar	CA	299-144-12
23	721 Camino Del Mar	Del Mar	CA	300-231-11
24	1834/1836 Oceanfront	Del Mar	CA	299-147-05
25	2052 Wilkins Ave	Napa	CA	
26	5819 Filaree Heights	Malibu	CA	4469-014-012
27	432 E Napa St	Sonoma	CA	018-860-001
28	383 Oak St	El Verano	CA	052-402-011
	21219 Heron Drive	Bodega Bay	CA	100-255-005
	405/407 London Way	Agua Caliente	CA	056-564-023
	1230 E. Napa St.	Sonoma	CA	127-242-038
	834 Donner Ave	Sonoma	CA	018-363-014
	2377 Lovall Valley Rd	Sonoma	CA	127-192-051
	3rd St. E	Sonoma	CA	018-363-004

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1300 North L Street	Lompoc	CA	089-490-01 089-490-02
7385 Greenhaven Dr	Sacramento	CA	031-0053-019
395 - 397 Coombs St			
1203 - 1219 Laurel St	Napa	CA	
2306/2376 Fairfield Ave	Fairfield	CA	
5421 Allison Way	Keyes	CA	045-066-015
7 Autumn Creek Ct	Napa	CA	046-122-016
902 Enterprise	Napa	CA	
2237/2257 Hurley Way	Sacramento	CA	285-0140-009 285-0140-032
13933 Chagall Court	Moreno Valley	CA	
20172 Northcove Square			

Appendix 3 – Identified Entities

- a. Douglas Fir Investments D, LLC
- b. Food Pavilion I, Ltd.
- c. Foothill Pine, LP
- d. Hood Partners LLC
- e. Jack Harouni, LLC
- f. Lassen Partners, LLC
- g. LM Single Family Holdings LP
- h. KS Mattson Partners, LP
- i. McKinley Partners, LLC
- j. Napa Elm I, LLC
- k. Perris Freeway Plaza, LP
- l. Perris Investors II, LLC
- m. Red Hickory Tree, LP
- n. Ringmaster's Square, LLC
- o. Specialty Properties Partners, LP
- p. Specialty Sales Classics, Inc.
- q. Specialty Sales Global, Inc.
- r. The Laurel Wreath Foundation, Inc.
- s. Treehouse Investments, LP
- t. Waters Edge Riverside Properties, LLC
- u. Windscape Apartments I D, LLC
- v. Windscape Apartments II D, LLC
- w. Woodland Oaks Investments, LLC

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EXHIBIT 2
Declaration of Gillian N. Brown, Esq.

Debra I. Grassgreen (CA Bar No. 169978)
John D. Fiero (CA Bar No. 136557)
Jason H. Rosell (CA Bar No. 269126)
Steven W. Golden (admitted pro hac vice)
Gillian N. Brown (CA Bar No. 205132)
PACHULSKI STANG ZIEHL & JONES LLP
One Sansome Street, Suite 3430
San Francisco, California 94104-4436
Telephone: 415-263-7000
Facsimile: 415-263-7010
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*Counsel to the Official Committee
of Unsecured Creditors*

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

In re
LEFEVER MATTSON,
a California corporation, *et al.*,¹
Debtors.

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

In re
KS MATTSON PARTNERS, LP,²
Debtor.

**DECLARATION OF GILLIAN N.
BROWN IN SUPPORT OF THE *EX
PARTE* APPLICATION OF THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ENTRY
OF AN ORDER PURSUANT TO
BANKRUPTCY RULE 2004
AUTHORIZING ORAL EXAMINATION
OF AND PRODUCTION OF
DOCUMENTS BY YOUTH FOR CHRIST
MINISTRIES SACRAMENTO**

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

² The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210. Solana Beach, CA 92075.

1 I, Gillian N. Brown, declare under penalty of perjury as follows:

2 1. I am a of counsel at the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZJ”),
3 counsel to the Official Committee of Unsecured Creditors (“Committee”) in the above-captioned
4 case. My office address and phone number at PSZJ are 10100 Santa Monica Boulevard, 13th Floor;
5 Los Angeles, California 90067. I am a member in good standing of the bars of California, the
6 District of Columbia, and New York. I am on inactive status with the Bar of Texas. I am admitted
7 to practice before this Court.

8 2. I submit this Declaration in support of the *Ex Parte Application of the Official*
9 *Committee of Unsecured Creditors for Entry of an Order Pursuant to Bankruptcy Rule 2004*
10 *Authorizing Oral Examination of and Production of Documents by Youth for Christ Ministries*
11 *Sacramento* (the “Application”) to which this Declaration is appended. I have personal knowledge
12 of the facts set forth in this Declaration unless otherwise stated.

13 3. Youth for Christ Ministries Sacramento (“YCM”) is a California religious non-
14 profit organization of which Timothy LeFever is currently a member of the board of directors. The
15 Committee is looking to uncover information that may lead to recovery of property of the estate
16 for the benefit of creditors. YCM describes itself on its website as “a movement that reaches
17 young people everywhere with the hope of Christ. We work with the local church and other like-
18 minded partners to raise up lifelong followers of Jesus who lead by their godliness in lifestyle,
19 devotion to the Word of God and prayer, passion for sharing the love of Christ, and commitment
20 to social involvement.”

21 4. Debtor LFM’s Statement of Financial Affairs, attachment 9 (“Certain Gifts and
22 Charitable Contributions”) [Doc. 292-1], details \$75,000.00 in payments to YCM, each in the
23 amount of \$5,000.00 made monthly between October 2022 and December 2023. The Committee’s
24 discovery is targeted to uncover information about those gifts and potentially undisclosed,
25 avoidable transfers of Debtors’ assets to YCM.
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4906-6771-2628.1 52011.00005 of 41 3

EXHIBIT 3
Proposed Form of Order Granting *Ex Parte* Application

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

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John D. Fiero (CA Bar No. 136557)
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Steven W. Golden (admitted *pro hac vice*)
Gillian N. Brown (CA Bar No. 205132)
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*Counsel to the Official Committee
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re
LEFEVER MATTSON,
a California corporation, *et al.*,¹
Debtors.

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

In re
KS MATTSON PARTNERS, LP,²
Debtor.

**ORDER GRANTING THE *EX PARTE*
APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN
ORDER PURSUANT TO BANKRUPTCY
RULE 2004 AUTHORIZING ORAL
EXAMINATION OF AND PRODUCTION
OF DOCUMENTS BY YOUTH FOR
CHRIST MINISTRIES SACRAMENTO**

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

² The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210. Solana Beach, CA 92075.

1 Upon consideration of the *EX PARTE* APPLICATION OF THE OFFICIAL
2 COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO
3 BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND
4 PRODUCTION OF DOCUMENTS BY YOUTH FOR CHRIST MINISTRIES SACRAMENTO
5 (the “Application”) [Doc. No.], the record in this case, and for good and sufficient cause
6 appearing,

7 IT IS HEREBY ORDERED AS FOLLOWS:

- 8 1. The Application is GRANTED.
- 9 2. The Official Committee of Unsecured Creditors is authorized to issue a subpoena
10 directed to Youth for Christ Ministries Sacramento (“YCM”) requiring YCM to (a) complete its
11 production, by **November 7, 2025**, of documents responsive to the Requests for Production (the
12 “Requests”) set forth substantially in the form attached as **Exhibit 1** to the Application; and (b)
13 provide oral testimony on a mutually agreed date no later than **November 21, 2025** (unless the
14 Committee and YCM agree to extend that date) relating to (i) YCM’s search for and possession,
15 custody, or control of documents responsive to the Requests; and (ii) the subject matter of the
16 Requests.

17
18 ****END OF ORDER****
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Debra I. Grassgreen (CA Bar No. 169978)
John D. Fiero (CA Bar No. 136557)
Jason H. Rosell (CA Bar No. 269126)
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*Counsel to the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
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In re
LEFEVER MATTSON,
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Case No. 24-10545 CN (Lead Case)
(Jointly Administered)
Chapter 11

In re
KS MATTSON PARTNERS, LP,²
Debtor.

CERTIFICATE OF SERVICE

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

² The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210. Solana Beach, CA 92075.

STATE OF CALIFORNIA)
)
CITY OF LOS ANGELES)

I, Maria R. Viramontes, am employed in the city and county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 10100 Santa Monica Blvd., Suite 1300, Los Angeles, California 90067.

On October 20, 2025, I caused to be served the **EX PARTE APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND PRODUCTION OF DOCUMENTS BY YOUTH FOR CHRIST MINISTRIES SACRAMENTO; DECLARATION OF GILLIAN N. BROWN, ESQ.** in the manner stated below:

☒	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On October 20, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below. See Attached.
☒	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. Edward Kaczmarek, registered agent for Youth for Christ Ministries Sacramento 2473 Briarton Dr. Lincoln, CA 95648

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on October 20, 2025, at Los Angeles, California.

/s/ Maria R. Viramontes
Maria R. Viramontes

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)

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