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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

**DEBTORS' STATEMENT OF NON-
 OPPOSITION TO MOTION FOR
 RELIEF FROM THE AUTOMATIC
 STAY**

In re

KS MATTSON PARTNERS, LP,

Debtor.

[Dkt. No. 2504]

Date: October 24, 2025

Time: 10:00 a.m.

Place: United States Bankruptcy Court
 1300 Clay Street, Courtroom 215
 Oakland, CA 94612

¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. Due to the large number of debtor entities in these 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/IM>

LeFever Mattson, a California corporation (“LeFever Mattson”), and certain of its affiliates that are debtors and debtors in possession (the “Debtors”)² in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby submit this statement of non-opposition to the *Motion for Relief from Automatic Stay* (the “Motion”) [Dkt. No. 2504], filed on October 1, 2025, by Ally Bank Lease Trust, Assignor to Vehicle Asset Universal Leasing Trust (a.k.a. “VAULT TRUST,” “V.A.U.L. Trust,” “VAULT,” or “V.A.U.L.T.”) (the “Movant”).

The Motion seeks relief from the automatic stay of LeFever Mattson to allow the Movant to proceed under applicable non-bankruptcy law to enforce its remedies to repossess and sell a 2019 Dodge Tru RAM 1500, VIN 1C6SRFPTXKN850314 (the “Vehicle”).

Although the documents filed in support of the Motion indicate that the Vehicle is titled in the name of LeFever Mattson, the Debtors were unaware of the Vehicle at the commencement of these Chapter 11 Cases. The Vehicle is not listed in the Amended Schedules of Assets and Liabilities for LeFever Mattson filed on September 9, 2025 [Dkt. No. 2273]. After some inquiry among the Debtors’ professionals and employees, the Debtors have identified and located the Vehicle. Counsel for the Debtors has contacted counsel for the Movants to coordinate the surrender of the Vehicle.

The Debtors do not disagree that, based on the Movant’s assertions regarding the lack of regular monthly contractual payments pursuant to the lease agreement and the lack of equity interest in the Vehicle under the lease agreement, relief from the automatic stay is appropriate. The Debtors have discussed their position with counsel for the Committee and have concluded that surrendering the Vehicle is in the best interests of the Debtors’ estates, creditors, and equity holders. Accordingly, the Debtors do not oppose the Movant being granted relief from the automatic stay of LeFever Mattson to repossess and sell the Vehicle, provided that the Debtors have an opportunity to review and approve as to form any proposed order on the Motion.

² Unless otherwise indicated, “Debtors” as used herein excludes KSMP and Live Oak Investments, LP.

1 While the Debtors consent to relief from the automatic stay, they reserve all rights and
2 claims they may have against the Movant, including any claims arising under Chapter 5 of Title 11
3 of the United States Code.

4
5 Dated: October 22, 2025

KELLER BENVENUTTI KIM LLP

6
7 By: /s/ Thomas B. Rupp

8 Thomas B. Rupp

9 *Attorneys for the Debtors and Debtors in*
10 *Possession*