1 2 3 4 5 6	Thomas P. Kelly III, Attorney at Law Law Offices of Thomas P. Kelly III P.C. CA 230699, OR 080927, DC 1000147 50 Old Courthouse Square, Suite 609 Santa Rosa, California, 95404-4926 Telephone: 707-545-8700 Facsimile: 707-542-3371 Email: tomkelly@sonic.net Attorney for Live Oak Investments LP and its general partner William Andrew		
8	UNITED STATES BANKRUPTCY COURT		
9	NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION		
10 11	In re:	Case No. 24-1	0545 (CN) (Lead Case)
12	LEFEVER MATTSON, a California corporation, <i>et al.</i> , ¹ Debtors.	Chapter 11	
13		(Jointly Administered)	
14		OBJECTION AND OPPOSITION TO PROPOSED SETTLEMENT WITH SOCOTRA CAPITAL	
15			
16		Date: Time:	November 5, 2025 11:00AM
17 18		Judge: Court:	Hon. Charles Novack 1300 Clay Street Courtroom 215
19			Oakland, California 94612
20			Via teleconference
21		Date filed:	September 12, 2024
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23			
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26			
27	The last four digits of LeFever Mattson's tax identification nur Cases, a complete list of the Debtors and the last four digits of their		

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.



Entered: 10/2



OBJECTION AND OPPOSITION

William Andrew as the general partner of the Debtor-in-possession Live Oak Investments LP (hereinafter "Debtor") presents this objection and opposition to the proposed settlement agreement with Socotra Capital, Inc., to the extent it purports to apply, bind, or otherwise settle any claims between Live Oak Investments LP and any third party including but not limited to Socotra Capital Inc.

Debtor objects to the presentation of this motion on its behalf by third party attorneys who are not authorized to act on behalf of Debtor. Specifically, this motion was filed on October 15, 2025 bearing docket entry 2556 in the record of this case.

On October 9, 2025 Debtor held a partnership meeting in which the partnership voted to remove LeFeverMattson Inc. (Hereinafter "LFM") as the general partner of Debtor, to appoint Mr. Andrew as general partner and president, to remove Keller Benvenutti Kim LLP (hereinafter "KBK") as counsel for Debtor, and to retain the Law Offices of Thomas P. Kelly III P.C. as counsel for Debtor. The present motion was filed by KBK after that vote was held specifically removing KBK as the attorney for Debtor. The motion to approve the settlement, to the extent it applies to Live Oak, has being presented in the name of Debtor by attorneys who lacked all authority to act on behalf of Debtor.

For that reason, Debtor opposes the present motion. Further, Debtor does not consent or agree to the present motion, and hereby withdraws both from the agreement itself and from the motion.

Dated: October 23, 2025

Thomas P. Kelly III
Attorney at Law