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Attorneys for 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.*,

Debtors.[1]

In re

KS MATTSON PARTNERS, LP,

Debtor.

Case No. 24-10545 CN (Lead Case)

(Jointly Administered)

Chapter 11

NOTICE OF MOTION AND MOTION TO DECLARE VOID ACTIONS IN VIOLATION OF THE AUTOMATIC STAY RELATED TO LIVE OAK INVESTMENTS, LP; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF

Date: *To be determined*
Time: *To be determined*
Place: *Via Zoom or In-Person* at:
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/LM.

TO THE HONORABLE CHARLES NOVACK, THE OFFICE OF THE UNITED STATES TRUSTEE, THE DEBTORS, INVESTORS OF LIVE OAK INVESTMENTS, LP, AND OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that the Official Committee of Unsecured Creditors (the "**Committee**" or "**Plaintiff**") of LeFever Mattson, a California corporation, ("**LFM**") and its affiliated debtors and debtors in possession (collectively, the "**LFM Debtors**") and KS Mattson LP ("**KSMP**," and together with the LFM Debtors, the "**Debtors**"), hereby moves (the "**Motion**") the court for the entry of an order (i) declaring certain actions relating to debtor Live Oak Investments, LP ("**Live Oak**") null and void because they were taken in violation of the automatic stay; and (ii) granting related relief.

PLEASE TAKE FURTHER NOTICE that the Motion is based on sections 362 and 105 of Title 11 of the United States Code (the "**Bankruptcy Code**"), the attached Memorandum of Points and Authorities, the Declaration of John D. Fiero, the arguments of counsel, and other admissible evidence properly brought before the court. In addition, the Committee requests that the Court take judicial notice of the extensive file in this case.

PLEASE TAKE FURTHER NOTICE that the hearing will take place at a date and time to be announced by subsequent notice after the Court considers and rules upon the forthcoming *Ex Parte Motion of the Official Committee of Unsecured Creditors Pursuant to B.L.R. 9006-1 for an Order Shortening Time for Hearing on Motion to Declare Void Actions in Violation of the Automatic Stay Related to Live Oak Investments, LP*.

WHEREFORE, the Committee respectfully requests that the Court enter an order (i) deeming the purported removal of LFM as the general partner of Live Oak null and void as a violation of the automatic stay of section 362(b) of the Bankruptcy Code; and (ii) granting related relief.

Dated: October 24, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ John D. Fiero
John D. Fiero

Attorneys for the Official Committee of Unsecured Creditors

MEMORANDUM OF POINTS AND AUTHORITIES

The Committee hereby requests entry of an order declaring the October 9, 2025 removal of LFM as the general partner of Live Oak null and void.[2] This is because LFM had a management interest in Live Oak that was property of LFM's bankruptcy estate and forcibly taken away post-petition without any order of this Court granting relief from the stay. Because the actions were taken in violation of one of the most fundamental principles of the Bankruptcy Code, the Court should declare them to be null and void.

I.

JURISDICTION

The United States Bankruptcy Court for the Northern District of California (the "**Court**") has jurisdiction over this Motion under 28 U.S.C. § 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

II.

FACTUAL STATEMENT

A. **The Bankruptcy Case Background**

1. **The LFM Debtors' Cases**

The LFM Debtors commenced 61 cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code in August and September 2024. Those cases are being jointly administered for procedural purposes under the lead case of LFM. No trustee or examiner has been appointed in the LFM Debtors' Cases. The LFM Debtors continue to operate their businesses and

[2] Stay violations are also punishable by the remedy of contempt, including an award of sanctions against the wrongdoers (in this case, William Andrew, Ronald and Molly Burgess, and the others who voted for LFM's removal). *In re Pace*, 56 F.3d 1170, 1176 (9th Cir. 1995) (trustee can recover costs and attorney's fees under § 105 for violations of the stay as a sanction for ordinary civil contempt); *In re Goodman*, 991 F.2d 613 (9th Cir. 1993); *In re Chateaugay Corp.*, 920 F.2d 183, 184-87 (2d Cir. 1990); *In re Ionosphere Clubs, Inc.*, 171 B.R. 18, 21 (S.D.N.Y. 1994) (all allowing civil contempt findings to be used to remedy violations of the automatic stay against corporations). While this Motion seeks a simple declaration that the action was void, the Committee reserves all rights to contend that the actors have additional liability by way of a future motion for contempt and the damages ensuing from such action.

manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. The KSMP Case

On November 22, 2024, an involuntary chapter 11 petition was filed against KSMP, commencing Case No. 24-10715 (Bankr. N.D. Cal.). On June 6, 2025, KSMP consented to the entry of a stipulated order for relief in the involuntary case, which order was entered by the Court on June 9, 2025.

2. Role of the Committee

The United States Trustee appointed the Committee in the LFM Debtors' chapter 11 cases on October 9, 2024, [Dkt. No. 135] and amended the appointment on November 25, 2024 [Docket No. 368], and then again on August 26, 2025 [Docket No. 2104], to appoint the Committee as the official committee for KSMP as well.

On October 24, 2025, the Committee and LFM Debtors (excluding Live Oak) executed a *Stipulation Granting the Official Committee of Unsecured Creditors Standing to Represent LeFever Mattson Debtors' Interests Regarding Live Oak Investment, LP* (the "**Standing Stipulation**") in which the LFM Debtors (excluding Live Oak) assigned to the Committee all rights, powers and causes of action relating to matters involving Live Oak and its assets. The Committee expects that an order approving the Standing Stipulation (which can be found at Docket No. 2617) will be entered promptly.

B. The Purported Removal of LFM as General Partner of Live Oak

The most recent Monthly Operating Report for Live Oak (filed on September 26, 2025 at Docket Number 2456) shows total assets of $6,379,963, with about half of that amount in cash and the other half in intercompany claims against other bankruptcy debtors.

Until very recently, LFM was the general partner of record for chapter 11 debtor and debtor in possession Live Oak. *See Declaration of John D. Fiero in Support of the Motion to Declare Void Actions in Violation of the Automatic Stay Related to Live Oak Investments, LP* ("**Fiero Decl.**"), ¶ 2. However, on October 7, 2025, two limited partners of Live Oak – the William N. Andrew and Sally G. Andrew Revocable Trust dated June 21, 2001 (the "**Andrew Trust**") and the Burgess Trust dated

October 9, 2006 (the "**Burgess Trust**") – filed a *Notice of Partnership Meeting* (the "**Notice**") at Docket No. 2530 announcing the intention of those limited partners to conduct a partnership meeting for the Live Oak partnership. According to the Notice, the purpose of the meeting was to "remove LeFever Mattson Inc. as the General Partner of Live Oak Investments L.P." and to "appoint William Andrew as the new General Partner of Live Oak Investments L.P." Notice, at p. 2.

The next day (and in response to the Notice) Bradley Sharp of Development Specialists, Inc. sent a letter to the partnership's investors seeking to dissuade them from attempting a coup in the management of Live Oak. Among other admonitions, Mr. Sharp warned:

> [E]lection of a new general partner would likely violate the automatic stay provided to Live Oak by section 362 of the Bankruptcy Code. While this may sound like a technicality, the automatic stay is a critical protection for chapter 11 debtors that allows them the "breathing room" to develop and propose a plan of reorganization or liquidation—just as the Debtors are doing. The Debtors reserve and retain their statutory right to seek relief from any action taken in violation of the automatic stay. Stay violations are sanctionable by the Bankruptcy Court in a variety of ways; at minimum, the Bankruptcy Court likely would undo the election.

Fiero Decl., Ex. B.

On October 9, 2025, William Andrew and other limited partners of Live Oak held a meeting and vote in which the those voting resolved by a requisite majority to remove LFM from its role as general partner. In this regard, an email from attorney Thomas Kelly sent after the meeting stated:

> As you are likely aware, yesterday the partnership voted to remove LeFeverMattson Inc. [sic] as the general partner of for [sic] Live Oak Investments LP. The new general partner is William Andrew. Further, the partnership voted to remove Keller Benvenutti Kim LLP as the legal representative and retained myself as the new attorney. . . .
>
> As a result of this change in representation, neither Mr. Taylor nor the committee of unsecured creditors has any authority to act on behalf of Live Oak Investments LP in any manner whatsoever as of October 9, 2025. To the extent any such authority was previously delegated, it is likewise withdrawn as of October 9, 2025.

Fiero Decl., ¶ 4; Fiero Decl., Ex. C.

On Monday, October 13, 2025, counsel for the Committee wrote back to Mr. Kelly, expressing the Committee's concerns about the removal of LFM as general partner. That letter stated in part:

> Your clients' recent partnership takeover effort sought to deprive LeFever Mattson of its Management Interest. As such, it was an act "to obtain possession of property of the estate" prohibited by 11 U.S.C. Section 362(a)(3). It was also entirely void as explained by the Ninth Circuit in *In re Schwartz*, 954 F.2d 569 (9th Cir. 1992) ("Congress intended violations of the automatic stay to be void rather than voidable. Nothing in the Code or the legislative history suggests that Congress intended to burden a bankruptcy debtor with an obligation to fight off unlawful claims.") *Id*. at 571.
>
> For the foregoing reasons, the Committee does not recognize and will not accept any assertions of authority made by or through Live Oak's alleged new general partner. In the event your clients seek to assume control of Live Oak, they must do so by way of a motion for relief from stay.

Fiero Decl, Ex. D. Attorney Kelly responded to this email and indicated that he would oppose a motion to declare the removal of LFM as general partner as a violation of the automatic stay and void. *See* Fiero Decl., ¶ 6. No motion for relief from stay to remove LFM as the general partner of Live Oak has been filed in these cases. *Id.* Instead, on the evening of October 22, 2025, attorney Kelly began filing a raft of pleadings as proposed counsel to Live Oak, including:

Docket Number 2612: *Substitution of Attorney*

Docket Number 2613: *Notice of Motion: (1) Substitution of Counsel for Live Oak Investment LP; (2) Withdrawal of Live Oak Investments from Joint Administration Order; and (3) Withdrawal of Chapter 11 Plan and Associated Disclosure Statement For Live Oak Investments LP*

Docket Number 2614: *Notice of Hearing* (regarding Docket No. 2613)

Docket Number 2615: *Objection and Opposition to Proposed Settlement With Socotra Capital*[3]

[3] This filing is particularly troubling because Live Oak has never been party to a loan with Socotra, nor has Live Oak ever held title to any property encumbered by a loan provided by Socotra. Ironically, therefore, the only *possible* claims Live Oak could have against Socotra would arise from a finding that Live Oak was part of a Ponzi scheme and should be substantively consolidated with the rest of the Debtors—findings that Mr. Kelly (on behalf of his limited partner clients) has repeatedly denied are appropriate.

III.

ARGUMENT

A. The Removal of LFM as General Partner of Live Oak Violated the Automatic Stay

Section 362(a) of the Bankruptcy Code provides that the filing of a petition "operates as a stay, applicable to all entities, of— (3) any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate." 11 U.S.C. § 362(a)(3).

The Ninth Circuit has held that a willful violation does not require specific intent to violate the automatic stay. *See Johnston Envtl Corp. v. Knight (In re Goodman)*, 991 F.2d 613, 618 (9th Cir. 1993) (good faith belief that it was not a violation not relevant to whether the act was willful); *see also Smith v. GTE N. Inc. (In re Smith)*, 170 B.R. 111, 117 (Bankr. N.D. Ohio 1994) (section 362(h) sanctions not precluded by "good faith" reliance on counsel's advice); *In re Xavier's of Beville*, 172 B.R. 667, 671 (Bankr. M.D. Fla. 1994) (violation of the stay only requires the act be deliberate; no specific intent to violate the stay is necessary); *accord Atkins v. Martinez (In re Atkins)*, 176 B.R. 998, 1008 (Bankr. D. Minn. 1994) ("willful" requires the creditor "act[] deliberately with knowledge of the bankruptcy petition").

A general partner's interests are composed of three components: the right to participate in profits, losses, distributions and proceeds of the partnership ("Economic Interest"); the right to participate in the management of the partnership ("Management Interest"); and the ownership share in partnership property as a tenant-in-partnership. Both the Economic Interest and the Management Interest are protected by the automatic stay imposed in the general partner's Chapter 11 case from actions attacking those interests directly. *See In re Cardinal Indus.*, 105 B.R. 834, 849-50 (Bankr. S.D. Ohio 1989). For this reason, bankruptcy courts in similar circumstances have recognized that general partnership interests in a limited partnership held by a chapter 11 debtor are property of the debtor's bankruptcy estate. *See e.g.*, *Cardinal Indus.*, 105 B.R. at 848-49; *see In re Plunkett*, 23 B.R. 392, 394 (Bankr. E.D. Wis. 1982) (where investors attempted to remove a debtor as the managing general partner, the Bankruptcy Court held that the investors' actions were actions against the debtor's contractual right to manage the partnership property, which was property of the estate).

Here, the limited partners' effort led by William Andrew and Ronald and Molly Burgess as trustees for their family trusts sought to deprive LFM of its Management Interest. As such, it was an act "to obtain possession of property of the estate" prohibited by section 362(a)(3) of the Bankruptcy Code. It was also entirely void as explained by the Ninth Circuit in *In re Schwartz*: "Congress intended violations of the automatic stay to be void rather than voidable. Nothing in the Code or the legislative history suggests that Congress intended to burden a bankruptcy debtor with an obligation to fight off unlawful claims." *In re Schwartz,* 954 F.2d 569, 571 (9th Cir. 1992).

B. **<u>Seizing Control of Live Oak Itself is a Violation of the Automatic Stay</u>**

While section 362(a) of the Bankruptcy Code provides "a stay, applicable to all entities, of—(3) any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate, " the scope of that stay includes "(6) any act to collect, assess, or recover a claim against the debtor that arose before the commencement of the case under this title." 11 U.S.C. §§ 362(a)(3) and (6).

Here, the activist limited partners of Live Oak who voted at the October 9, 2025 meeting have made no secret of their intentions: they want to crack the piggy bank of sale proceeds that Live Oak now holds and then distribute them to Live Oak investors only before any substantive consolidation or Ponzi issues can be presented to the Court for consideration. This is precisely contrary to the intent of the statutory scheme, and a blatant violation of the stay.

IV.

<u>CONCLUSION</u>

For the foregoing reasons, the Court should grant the Motion and require any limited partner of Live Oak to first come to this Court to make a showing under section 362(d) of the Bankruptcy Code that relief from stay is warranted.

WHEREFORE, the Committee respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, (i) declaring the replacement of Live Oak's general partner on October 9, 2025, to be null and void; and (ii) granting related relief.

Dated: October 24, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By: *__/s/ John D. Fiero__*
John D. Fiero

Attorneys for the Official Committee of Unsecured Creditors

EXHIBIT A

PACHULSKI STANG ZIEHL & JONES LLP
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John D. Fiero (CA Bar No. 136557)
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Attorneys for 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.*, Debtors.[1] --- In re KS MATTSON PARTNERS, LP, Debtor.	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11 **[PROPOSED] ORDER GRANTING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION TO DECLARE VOID ACTIONS IN VIOLATION OF THE AUTOMATIC STAY RELATED TO LIVE OAK INVESTMENTS, LP** Date: *To be determined* Time: *To be determined* Place: *Via Zoom or In-Person at*: 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/LM.

The *Motion to Declare Void Actions in Violation of the Automatic Stay Related to Live Oak Investments, LP* (the "Motion") [Docket No. ___] came on for hearing on _______, 2025 (the "Hearing").[2] Appearances were made as noted in the record of these proceedings. The Court having found that notice of the Motion was properly given in the circumstances; the Court having considered the Motion, the memorandum of points and authorities, and declaration filed therewith, the evidence presented, and the representations and arguments of counsel at the hearing on the Motion, and the record in the above-captioned chapter 11 cases of LeFever Mattson, a California corporation, ("LFM") and its affiliated debtors and debtors in possession (collectively, the "LFM Debtors") and KS Mattson LP ("KSMP," and together with the LFM Debtors, the "Debtors"); and the Court finding that the legal and factual bases set forth in the Motion and at the Hearing establish good cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

2. The removal and replacement of the general partner of Live Oak Investments, LP ("Live Oak") violated section 362(a) of the Bankruptcy Code and such actions are deemed null and void.

3. LFM remains the general partner of Live Oak.

4. The Court retains jurisdiction with respect to all matters arising under or related to the interpretation or implementation of this Order.

**** END OF ORDER ****

[2] Any capitalized terms not defined herein have the meaning ascribed to such term in the Motion.

COURT SERVICE LIST

All ECF Participants

Debra I. Grassgreen (CA Bar No. 169978)
John D. Fiero (CA Bar No. 136557)
Jason H. Rosell, (CA Bar No. 269126)
Steven W. Golden *(Pro Hac Vice)*
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Attorneys for 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.*, Debtors.[1] In re KS MATTSON PARTNERS, LP, Debtor.	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11 **DECLARATION OF JOHN D. FIERO IN SUPPORT OF THE MOTION TO DECLARE VOID ACTIONS IN VIOLATION OF THE AUTOMATIC STAY RELATED TO LIVE OAK INVESTMENTS, LP** Date: *To be determined* Time: *To be determined* Place: *Via Zoom or In-Person* at: 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

I, John D. Fiero, declare:

1. I am an attorney at law duly licensed in the State of California and admitted to practice before this Court. I am a partner in Pachulski Stang Ziehl & Jones LLP, counsel to the Official Committee of Unsecured Creditors (the "**Committee**" or "**Plaintiff**") of LeFever Mattson, a California corporation ("**LFM**"), and its affiliated debtors and debtors in possession (collectively, the "**LFM Debtors**") and KS Mattson LP ("**KSMP**," and together with the LFM Debtors, the "**Debtors**"). I make this declaration in support of the Committee's *Motion to Declare Void Actions in Violation of the Automatic Stay Related to Live Oak Investments, LP* (the "**Motion**").

2. Until very recently, LFM was the general partner of chapter 11 debtor and debtor in possession Live Oak Investments, LP ("**Live Oak**"). However, on October 7, 2025, two limited partners of Live Oak – the William N. Andrew and Sally G. Andrew Revocable Trust dated June 21, 2001 (the "**Andrew Trust**") and the Burgess Trust dated October 9, 2006 (the "**Burgess Trust**") – filed a *Notice of Partnership Meeting* at Docket Number 2530 in the above-captioned jointly-administered case (the "**Notice**") announcing the intention of those limited partners to conduct a partnership meeting for the Live Oak partnership. According to the Notice (a true and correct copy of which is attached hereto as **Exhibit A**), the purpose of the meeting was to "remove LeFever Mattson Inc. as the General Partner of Live Oak Investments L.P." and "appoint William Andrew as the new General Partner of Live Oak Investments L.P."

3. On or about October 8, 2025, I received a copy of a letter prepared by Bradley Sharp of Development Specialists, Inc. addressed to "the Partners of Live Oak Investments, LP, and their counsel" a true and correct copy of which is attached hereto as **Exhibit B**.

4. Based upon an email I received from Thomas Kelly, Esq., I am informed and believe that, on October 9, 2025, the Andrew Trust and other limited partners of Live Oak held a meeting and also a vote in which the those voting resolved by a requisite majority to remove LFM from its role as general partner. In this regard, I offer the document attached hereto as **Exhibit C**, which is a true and correct copy of Thomas Kelly's October 10, 2025 email. It states, in pertinent part:

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.

> As you are likely aware, yesterday the partnership voted to remove LeFever Mattson Inc. [sic] as the general partner of for [sic] Live Oak Investments LP. The new general partner is William Andrew. Further the partnership voted to remove Keller Benvenutti Kim LLP as the legal representative and retained myself as the new attorney. . . .
>
> As a result of this change in representation, neither Mr. Taylor nor the committee of unsecured creditors has any authority to act on behalf of Live Oak Investments LP in any manner whatsoever s of October 9, 2025. To the extent any such authority was previously delegated, it is likewise withdrawn as of October 9, 2025.

5. On Monday, October 13, 2025, I wrote back to Mr. Kelly, expressing the Committee's concerns about the removal of LFM as general partner. My letter (a true and correct copy of which is attached hereto as **Exhibit D**) states in part :

> Your clients' recent partnership takeover effort sought to deprive LeFever Mattson of its Management Interest. As such, it was an act "to obtain possession of property of the estate" prohibited by 11 U.S.C. Section 362(a)(3). It was also entirely void as explained by the Ninth Circuit in *In re Schwartz*, 954 F.2d 569 (9th Cir. 1992) ("Congress intended violations of the automatic stay to be void rather than voidable. Nothing in the Code or the legislative history suggests that Congress intended to burden a bankruptcy debtor with an obligation to fight off unlawful claims.") *Id*. at 571.
>
> For the foregoing reasons, the Committee does not recognize and will not accept any assertions of authority made by or through Live Oak's alleged new general partner. In the event your clients seek to assume control of Live Oak, they must do so by way of a motion for relief from stay.

6. Mr. Kelly responded to my email indicating that he would oppose a motion to declare these actions violations of the automatic stay and void. Mr. Kelly has not filed a motion for relief from stay to remove LFM as the general partner of Live Oak.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 24th day of October, 2025 at San Francisco, California.

/s/ John D Fiero
John D. Fiero

EXHIBIT A

(Notice)

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
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Email : tomkelly@sonic.net

Attorney for Creditors
Andrew Revocable Trust dated June 21, 2001
Burgess Trust dated October 9, 2006

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) Chapter 11 (Jointly Administered) NOTICE OF PARTNERSHIP MEETING Judge: Hon. Charles Novack Court: 1300 Clay Street Courtroom 215 Oakland, California 94612 Date filed: September 12, 2024

1 The last four digits of LeFever Mattson's tax identification number are 7537. 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/LM. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

LIVE OAK INVESTMENTS LP
NOTICE OF PARTNERSHIP MEETING

To all partners of Live Oak Investments L.P.,

This letter is to provide notice that pursuant to §5.4.1 of the Limited Partnership Agreement of Live Oak Investments LP (hereinafter "Partnership Agreement") a meeting of the partners has been called by two partners those being (1) the trustee of the William N. Andrew and Sally G. Andrew Revocable Trust dated June 21, 2001 and (2) the trustee of the Burgess Trust dated October 9, 2006.

This partnership meeting will be held via Zoom teleconference as authorized under §5.4.5 of the Partnership Agreement as well as California Corporations Code §15636 & §15637 at the following date and time:

Thursday, October 9, 2025 at 5:00pm PST.

The agenda and purpose of this partnership meeting will be to hold a vote on the following matters:

1. To remove LeFever Mattson Inc. as the General Partner of Live Oak Investments L.P..

2. To appoint William Andrew as the new General Partner of Live Oak Investments L.P..

3. To appoint William Andrew as the new President of Live Oak Investments L.P..

4. To authorize Live Oak Investments L.P. to retain and pay for the services of the Law Offices of Thomas P. Kelly III P.C. as the legal representative for Live Oak Investments L.P..

The basis of the action to remove the current General Partner is that LeFever Mattson Inc. took actions that are in direct violation of the Partnership Agreement which constitutes cause for removal. Specifically, that on September 4, 2024 LeFever Mattson Inc. distributed $842,418 to itself from the accounts of Live Oak Investments L.P. representing a 21.6% share of the proceeds of the sale of Southwood Apartments, which was the sole real estate asset of Live Oak Investments L.P.. At the time of this distribution, LeFever Mattson Inc. did not distribute any sale proceeds to any of the other partners.

This was a direct violation of the Partnership Agreement §3.8 entitled "Priority Over Other Partners" which states as follows: "No Partner shall have priority over any other partner, with respect to the return of a Capital Contribution, or distributions or allocations of income, gain, losses, deductions, credits or items thereof."

This was also a direct violation of the Partnership Agreement §4.7 entitled "Liquidating Proceeds" which states as follows: "Notwithstanding any other provisions of this Agreement to the contrary, when there is a distribution in liquidation of the Partnership, or when any Partner's interest is liquidated, all items of income and loss first shall be allocated to the Partners' Capital Accounts under this Article Four, and other credits and deductions to the Partners' Capital Accounts shall be made before the final distribution is made. The final distribution to the Partners shall be made to the Partners to the extent of and in proportion to their positive Capital Account balances."

On the basis of the foregoing actions, cause exists to remove LeFever Mattson Inc. as General Partner. At this partnership meeting a vote will be held on this removal as well as the other matters set forth above.

Questions regarding this partnership meeting can be directed to the attorney for the two partners calling this meeting which is Thomas P. Kelly III, 50 Old Courthouse Square, Suite 609 Santa Rosa, California, 95404-4926, Telephone : 707-545-8700 and email of tomkelly@sonic.net.

Case: 24-10545 Doc# 2690 Filed: 10/24/25 Entered: 10/24/25 16:13:42 Page 3 of 3

EXHIBIT B

(October 8, 2025 Letter)

DSI Development Specialists, Inc.
Advisory and Fiduciary Services • Corporate Restructuring and Workouts • Interim Management • Insolvency Services

October 8, 2025

VIA ELECTRONIC MAIL

Re: *In re: LeFever Mattson,* a California corporation*, et al.*, Case No. 24-10545 (Jointly Administered) (Bankr. N. D. Cal.) – October 9, 2025 Partnership Meeting of Live Oak Investments, LP

To the Partners of Live Oak Investments, LP, and their counsel:

As you know, I am the chief restructuring officer for LeFever Mattson, a California corporation, and its affiliates that are debtors and debtors in possession (collectively, the "LFM Debtors"), including Live Oak Investments, LP ("Live Oak"), in the above-referenced chapter 11 cases (the "Chapter 11 Cases") pending before the Honorable Charles Novack, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Northern District of California (the "Bankruptcy Court").

On September 5, 2025, the LFM Debtors, KS Mattson Partners, LP ("KSMP," and together with the LFM Debtors, the "Debtors"), and the Official Committee of Unsecured Creditors (the "Committee," and together with the Debtors, the "Plan Proponents"), filed the *Joint Chapter 11 Plan of Liquidation* [Dkt. No. 2226] (the "Plan") and related pleadings. The Plan provides for a global settlement of the outstanding claims asserted against and equity interests asserted in the Debtors, including Live Oak. The Plan resolves the complex issues in the Chapter 11 Cases, including the substantive consolidation of the Debtors and the treatment of investor claims in the context of a Ponzi scheme. The Plan Proponents firmly believe that the Plan is in the best interest of the Debtors, including Live Oak, and their stakeholders. Our aim is to have the Plan confirmed by the Bankruptcy Court by early February 2026, and for investor distributions to begin soon thereafter.

I have reviewed the letter of Mr. Thomas Kelly, counsel to two Live Oak limited partners, calling for a Live Oak partnership meeting on October 9, 2025. I am concerned that the actions proposed in Mr. Kelly's letter, if approved, would have consequences that you may not anticipate and that do not benefit Live Oak and its stakeholders.

First, the election of a new general partner for Live Oak would do nothing to change the status or progress of the Chapter 11 Cases. The Plan Proponents would continue to propose the same Plan, with the same terms, voting procedures, and proposed timing for confirmation.

Second, election of a new general partner for Live Oak would not result in immediate distribution of Live Oak's assets to investors. To the contrary, regardless of the identity of the Live Oak general partner, the Bankruptcy Court will not allow distribution of assets other than through a confirmed plan.

Third, election of a new general partner would likely violate the automatic stay provided to Live Oak by section 362 of the Bankruptcy Code. While this may sound like a technicality, the automatic stay is a critical protection for chapter 11 debtors that allows them the "breathing room" to develop and propose a plan of reorganization or liquidation—just as the Debtors are doing. The Debtors reserve and retain their statutory right to seek relief from any action taken in violation of the automatic stay. Stay violations are sanctionable by the Bankruptcy Court in a variety of ways; at minimum, the Bankruptcy Court likely would undo the election.

Fourth, Mr. Kelly cannot become the legal representative of Live Oak. Mr. Kelly currently represents clients who are legally adverse to Live Oak, having initiated a contested matter seeking appointment of a trustee for Live Oak. Accordingly, both Rule 1.7(a) of the California Rules of Professional Conduct, which bars simultaneous representation of adverse clients without written consent, and section 327(a) of the Bankruptcy Code, which requires that a debtor's attorney be "disinterested," would bar Mr. Kelly from becoming Live Oak's legal representative.

Fifth, and relatedly, a new general partner would need to cause Live Oak to engage a new set of professionals, including attorneys, accountants, tax professionals, and financial advisors—all at the expense of the Live Oak estate. The Committee would remain in place, though I understand that it would need to bill separately for any work related to Live Oak.

Finally, appointment of a new general partner would add unnecessary legal risk for Live Oak's investors. Any action by the new general partner resulting in *lesser* distributions to Live Oak investors than would have been available under the Plan would likely become a target for breach of fiduciary duty lawsuits. And any action resulting in *greater* distributions to Live Oak investors than would have been available under the Plan would likely be subject to lawsuits by other Debtors, including LeFever Mattson. As Live Oak's limited partners, you would have to bear the expense of participating in such litigation as well as the time and burden of responding to discovery requests.

I will expand on these views at the Live Oak partnership meeting and will be happy to answer any of your questions at that time.

Yours truly,

Bradley D. Sharp

EXHIBIT C

(October 10, 2025 Email)

From: Thomas P. Kelly III <tomkelly@sonic.net>
Sent: Friday, October 10, 2025 12:13 PM
To: dtaylor@kbkllp.com; Tobias Keller <tkeller@kbkllp.com>; trupp@kbkllp.com; Jason Rosell <jrosell@pszjlaw.com>; Debra Grassgreen <dgrassgreen@pszjlaw.com>; John Fiero <jfiero@pszjlaw.com>; Brooke E. Wilson <bwilson@pszjlaw.com>; LM Committee <LMCommittee@pszjlaw.com>
Cc: 'Daniel L. Egan' <DEgan@wilkefleury.com>; 'Jason G. Eldred' <jeldred@wilkefleury.com>; 'bsharp@DSIConsulting.com'
Subject: 24-10545 LFM & 24-10511 Live Oak - substitution of attorney

Dear Mr. Taylor & Mr. Rosell,

As you are likely aware, yesterday the partnership voted to remove LeFeverMattson Inc. as the general partner of for Live Oak Investments LP. The new general partner is William Andrew. Further, the partnership voted to remove Keller Benvenutti Kim LLP as the legal representative and retained myself as the new attorney.

To that end a substitution of attorney is attached for Mr. Taylor to sign and return to my office promptly. Further, this letter is a formal demand to Keller Benvenutti Kim LLP for the turnover of all files and materials for Live Oak Investments LP pursuant to Rule of Professional Conduct 1.16.

As a result of this change in representation, neither Mr. Taylor nor the committee of unsecured creditors has any authority to act on behalf of Live Oak Investments LP in any manner whatsoever as of October 9, 2025. To the extent any such authority was previously delegated, it is likewise withdrawn as of October 9, 2025.

If there are outstanding matters that need to be addressed regarding this change in representation, then please contact my office.

Thomas P. Kelly III

Thomas P. Kelly III, Attorney at Law, Certified by the State Bar of California in Bankruptcy Law
Law Offices of Thomas P. Kelly III P.C., 50 Old Courthouse Square, Suite 609, Santa Rosa, California, 95404-4926
Phone: 707-545-8700 Fax: 707-542-3371 Email: tomkelly@sonic.net www.redwoodbankruptcy.com

LAW OFFICES OF THOMAS P. KELLY III P.C.
A PROFESSIONAL CORPORATION

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October 10, 2025

David A. Taylor, Esq.
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San Francisco, California
94104

Jason H. Rosell, Esq.
Pachulski Stang Ziehl & Jones LLP
One Sansome Street
34th Floor
Suite 3430
San Francisco, California
94104-4436

Via email to dtaylor@kbkllp.com, tkeller@kbkllp.com, trupp@kbkllp.com
Via email to jrosell@pszjlaw.com, dgrassgreen@pszjlaw.com, jfiero@pszjlaw.com, bwilson@pszjlaw.com

Re : 24-10545 CAND BK *In re LeFeverMattson, Inc.*
24-10511 CAND BK *In re Live Oak Investments LP*

Dear Mr. Taylor & Mr. Rosell,

As you are likely aware, yesterday the partnership voted to remove LeFeverMattson Inc. as the general partner of for Live Oak Investments LP. The new general partner is William Andrew. Further, the partnership voted to remove Keller Benvenutti Kim LLP as the legal representative and retained myself as the new attorney

To that end a substitution of attorney is attached for Mr. Taylor to sign and return to my office promptly. Further, this letter is a formal demand to Keller Benvenutti Kim LLP for the turnover of all files and materials for Live Oak Investments LP pursuant to Rule of Professional Conduct 1.16.

As a result of this change in representation, neither Mr. Taylor nor the committee of unsecured creditors has any authority to act on behalf of Live Oak Investments LP in any manner whatsoever as of October 9, 2025. To the extent any such authority was previously delegated, it is likewise withdrawn as of October 9, 2025.

If there are outstanding matters that need to be addressed regarding this change in representation, then please contact my office.

Sincerely,

Thomas P. Kelly III
Attorney at Law

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 Debtor
Live Oak Investments L.P.

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) Chapter 11 (Jointly Administered) SUBSTITUTION OF ATTORNEY

Debtor Live Oak Investments L.P. hereby substitutes Thomas P. Kelly III as its attorney of record in this case.

Dated: October 10, 2025

William Andrew
General Partner of Live Oak Investments L.P.

Dated: October ____, 2025

David Taylor, Keller Benvenutti Kim LLP
Prior counsel for Live Oak Investments L.P.

Dated: October 10, 2025

Thomas P. Kelly III
Attorney at Law

1 The last four digits of LeFever Mattson's tax identification number are 7537. 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/LM. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

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Email : tomkelly@sonic.net

Attorney for Debtor
Live Oak Investments L.P.

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re: LIVE OAK INVESTMENTS, L.P. Debtor. Tax ID : 47-3786181	Case Number: 24-10511 Chapter 11 SUBSTITUTION OF ATTORNEY

Debtor Live Oak Investments L.P. hereby substitutes Thomas P. Kelly III as its attorney of record in this case.

Dated: October 10, 2025

William Andrew
General Partner of Live Oak Investments L.P.

Dated: October ____, 2025

David Taylor, Keller Benvenutti Kim LLP
Prior counsel for Live Oak Investments L.P.

Dated: October 10, 2025

Thomas P. Kelly III
Attorney at Law

EXHIBIT D

(October 13, 2025 Letter)

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
LOS ANGELES, CALIFORNIA

John D. Fiero
415.217.5101
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October 13, 2025

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VIA EMAIL

Thomas Kelly
Law Offices of Thomas P. Kelly III
50 Old Courthouse Square, Suite #609
Santa Rosa, CA 95404

Re: ***In re LeFever Mattson*, Case No. 24-10545 and all jointly administered cases**

Dear Mr. Kelly:

As you know, our law firm represents the Official Committee of Unsecured Creditors of LeFever Mattson and its more than 60 affiliates, including Live Oak Investments LP ("Live Oak"). We write to bring to the attention of your clients, Andrew Revocable Trust dated June 21, 2001 and the Burgess Trust dated October 9, 2006, our concerns regarding their participation in a direct violation of the automatic stay of 11 U.S.C. Section 362. In this regard, we refer specifically to your clients' attempt to remove LeFever Mattson, a California corporation and debtor and debtor in possession, as general partner of Live Oak at a partnership meeting your clients called that you have advised occurred on October 9, 2025. As explained below, those actions were entirely void, and the Committee does not recognize them.

A general partner's interests are comprised of three components: the right to participate in profits, losses, distributions and proceeds of the partnership ("Economic Interest"); the right to participate in the management of the partnership ("Management Interest"); and the ownership share in partnership property as a tenant-in-partnership. Both the Economic Interest and the Management Interest are protected by the automatic stay imposed in the general partner's Chapter 11 case from actions attacking those interests directly. *See In re Cardinal Industries*, 105 Bankr. at 849-50. For this reason, bankruptcy courts in similar circumstances have ruled that general partnership interests in a limited partnership held by a chapter 11 debtor are property of the debtor's bankruptcy estate. *Cardinal Industries*, 105 Bankr. at 848-49. *See also Quarles House Apts. v. Plunkett (In re Plunkett)*, 23 BR 392 (Bankr. E.D. Wis. 1982) (where investors attempted to remove a debtor as the managing general partner, the Bankruptcy Court held that the investors' actions were actions against the debtor's contractual right to manage the partnership property, which was property of the estate). *In re Plunkett*, 23 B.R. at 394.

Your clients' recent partnership takeover effort sought to deprive LeFever Mattson of its Management Interest. As such, it was an act "to obtain possession of property of the estate" prohibited by 11 U.S.C. Section 362(a)(3). It was also entirely void as explained by the Ninth Circuit in *In re Schwartz*, 954 F.2d 569 (9th Cir. 1992) ("Congress intended violations of the automatic stay to be void rather than voidable. Nothing in the Code or the legislative history suggests that Congress intended to burden a bankruptcy debtor with an obligation to fight off unlawful claims.") *Id*. at 571.

For the foregoing reasons, the Committee does not recognize and will not accept any assertions of authority made by or through Live Oak's alleged new general partner. In the event your clients seek to assume control of Live Oak, they must do so by way of a motion for relief from stay.

Further, while the Committee does not believe that you or your law firm can ever be allowed to represent Live Oak as debtor's counsel due to issues with Section 327's "disinterestedness" requirement, we note that you recently received a draft settlement agreement from the Keller Benvenutti Kim law firm following a lengthy mediation with Socotra Capital, Inc. The claims subject to that settlement were assigned to the Committee in a standing stipulation filed and entered long ago. *See First Amended Stipulation Granting the Official Committee of Unsecured Creditors Standing to Pursue Estate Causes of Action Against Socotra Capital, Inc. and its Affiliates* filed on July 7, 2025 at Docket No. 1693. As a result, the Committee has full authority to proceed with such settlement.

Pursuant to that stipulation at Paragraph 5, Live Oak has a common interest with each of the other Debtors and the Committee. Furthermore, Live Oak along with the other Debtors and KS

Mattson Partners LP engaged in a mediation with Socotra pursuant to a signed mediation confidentiality agreement. Perhaps unknowingly, you breached both of those agreements when you shared the draft settlement agreement with attorney Daniel Egan. The Committee demands that you ask Mr. Egan to return the document and delete all his emails regarding the same. Please advise me when you have done so.

In sum, the Committee disputes the legitimacy of your clients' attempt to take over Live Oak because they have violated the automatic stay. Such acts are void, and it is now incumbent upon your clients to file a motion and prove they are entitled under Bankruptcy Code Section 362(d) to deprive LeFever Mattson of its Management Interest at this crucial time in the middle of an ongoing multi-debtor plan confirmation process. Moreover, your disregard for the common interest protection and the mediation privilege shared by all the debtors has resulted in a serious breach that must be remedied immediately.

Please advise me no later than Wednesday, October 15, 2025 at noon how your clients will proceed.

Very truly yours,

John D. Fiero

cc: Keller Benvenutti Kim
Hogan Lovells
Development Specialists, Inc.

PACHULSKI STANG ZIEHL & JONES LLP
Debra I. Grassgreen (Cal. Bar No. 169978)
John D. Fiero (Cal. Bar No. 136557)
Jason H. Rosell (Cal. Bar No. 269126)
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San Francisco, California 94104-4436
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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.*, Debtors.[1] In re KS MATTSON PARTNERS, LP, Debtor.	Case No. 24-10545 CN (Lead Case) (Jointly Administered) Chapter 11 **CERTIFICATE OF SERVICE** Date: *To be determined* Time: *To be determined* Place: *Via Zoom or In-Person* at: 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/LM.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

One Sansome Street, Suite 3430, San Francisco, CA 94105.

A true and correct copy of the foregoing document entitled (*specify*)**:**

- ***Notice of Motion and Motion to Declare Void Actions in Violation of the Automatic Stay Related to Live Oak Investments, LP; Memorandum of Points and Authorities in Support Thereof***
- ***Declaration of John D. Fiero in Support of the Motion to Declare Void Actions in Violation of The Automatic Stay Related To Live Oak Investments, LP***

is served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **October 24, 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:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On (*date*) ________________, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) ________________, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

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

October 24, 2025	Oliver Carpio	*/s/ Oliver Carpio*
Date	*Printed Name*	*Signature*

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**:
Case 24-10545 CN

- Asaph Abrams ecfcanb@aldridgepite.com
- Gabrielle L. Albert galbert@kbkllp.com
- Kyra E. Andrassy kandrassy@raineslaw.com, csheets@swelawfirm.com
- Ruth Elin Auerbach ruth.auerbach.esq@gmail.com
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- Eric A. Nyberg e.nyberg@kornfieldlaw.com, g.michael@kornfieldlaw.com
- Abigail O'Brient AOBrient@cov.com, docketing@cov.com
- Office of the U.S. Trustee / SR USTPRegion17.SF.ECF@usdoj.gov
- Steven M. Olson steve@bfolegal.com
- Dustin Owens dustin.owens@gmail.com
- Eric S. Pezold epezold@swlaw.com, fcardenas@swlaw.com
- William L. Porter bporter@porterlaw.com, Ooberg@porterlaw.com
- Douglas B. Provencher dbp@provlaw.com
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- Thomas B. Rupp trupp@kbkllp.com
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