

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)

Steven W. Golden (admitted *Pro Hac Vice*)

Brooke E. Wilson (Cal. Bar No. 354614)

One Sansome Street, 34th Floor, Suite 3430

San Francisco, California 94104-4436

Telephone: 415-263-7000

Email: LMCommittee@pszjlaw.com

*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

Case No. 24-10545 CN (Lead Case)

(Jointly Administered)

Chapter 11

In re

KS MATTSON PARTNERS, LP,

Debtor.

***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*****[NO HEARING REQUESTED]**

The Official Committee of Unsecured Creditors (the “Committee”) submits this motion (“Motion to Shorten Time”), pursuant to section 105 of title 11 of the United States Code (the “Bankruptcy Code”), rule 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 9006-1(c) of the Local Rule of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Northern District of California (“Local Bankruptcy Rules”), and Judge

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>.



Novack's Practices and Procedures for Hearing (at paragraph 6), seeking entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), shortening time on the hearing of the Committee's *Motion to Declare Void Actions in Violation of the Automatic Stay Related to Live Oak Investments, LP* [Docket No. 2690] (the "Stay Violation Motion"). This Motion to Shorten Time is supported by the points and authorities below, and the accompanying *Declaration of John D. Fiero in Support of the 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* (the "Fiero Declaration").

I.

RELIEF REQUESTED

By this Motion to Shorten Time, the Committee respectfully requests a hearing on the Stay Violation Motion (the "Hearing") to be scheduled for November 5, 2025 at 11:00 a.m., or as soon thereafter as is convenient for the Court, and that responses or objections to the Stay Violation Motion be filed by October 31, 2025. As set forth more completely in the Stay Violation Motion, the Committee seeks an order (i) declaring certain actions relating to debtor Live Oak Investments L.P. ("Live Oak") null and void because they were taken in violation of the automatic stay; and (ii) granting related relief.

The Committee seeks to shorten time herein because the topic of whether or not Live Oak is being run by the appropriate parties requires attention more immediate than that offered by the Court's local rules, which contemplate 28 days' notice of a motion like the one the Committee has filed here. Specifically, Live Oak – acting through its purported new counsel – has filed several pleadings, including its *Objection and Opposition to Proposed Settlement with Socotra Capital* [Docket No. 2615] which is set for a hearing on November 5, 2025 at 11:00 a.m. The question of whether such objection is properly before the Court is rooted in whether Live Oak's limited partners have violated the automatic stay of section 362(a)(3) of the Bankruptcy Code. Their interrelationship requires both questions to be addressed at once. Accordingly, for the reasons set forth herein and in

1 the Fiero Declaration filed contemporaneously herewith, the Committee respectfully requests that
2 the Court enter the Proposed Order.

3 **II.**

4 **JURISDICTION**

5 The United States Bankruptcy Court for the Northern District of California (the “Court”) has
6 jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring
7 Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order (N.D. Cal.), and Local
8 Rule 5011-1(a). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before
9 the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

10 **III.**

11 **THE MOTION SHOULD BE HEARD ON SHORTENED TIME**

12 A hearing on the Motion requires twenty-eight (28) days’ notice pursuant to Local
13 Bankruptcy Rule 9014-1(c)(1). In addition, Local Bankruptcy Rule 9006-1(a) provides that, except
14 as set forth therein, “approval of the Court is required to enlarge or to shorten time to perform any
15 act or file any paper pursuant to the Federal Rules of Civil Procedure, the Bankruptcy Rules, or these
16 Bankruptcy Local Rules.”

17 Local Bankruptcy Rule 9006-1(c) also provides that absent exigent circumstances, any
18 motion shall be heard on at least 72 hours’ notice to the respondent and any request to shoren time
19 must be accompanied by a declaration stating (1) the reason for the shortening of time, (2) whether
20 any previous modifications were made, (3) the effect of the modified schedule for the case, and
21 (4) the efforts made to speak to the respondent.

22 Exigencies justify shortening notice on the Stay Violation Motion. As further described in the
23 Stay Violation Motion, since the purported removal of LeFever Mattson, a California corporation
24 (“LFM”) as general partner of Live Oak and appointment of William Andrew as the general partner
25 of Live Oak, Live Oak’s purported new counsel has filed several pleadings, including its *Objection*
26 *and Opposition to Proposed Settlement with Socotra Capital* [Docket No. 2615] which is set for a
27 hearing on November 5, 2025. The Committee believes that the removal of LFM and appointment of
28 William Andrew as the general partner of Live Oak violated the automatic stay (as to LFM) and

1 such actions are null and void, and thus, Live Oak's purported new counsel lacks the authority to file
2 pleadings as counsel for Live Oak.

3 **NOTICE**

4 Notice of this Motion to Shorten will be provided by ECF to: (i) the Office of the United
5 States Trustee for Region 17 (ii) counsel to the Debtors; (iii) proposed counsel to Live Oak;
6 (iv) counsel to William N. Andrew and Sally G. Andrew Revocable Trust dated June 21, 2001, and
7 (v) those persons who have formally appeared in this case and receive ECF notification. Notice of
8 this Motion to Shorten will also be provided by email to the Live Oak investors who received notice
9 of the October 9, 2025 partnership meeting. The Committee respectfully submits that no further
10 notice is required. The Committee has not made any previous request for the relief sought in this
11 Motion to Shorten or the Stay Violation Motion.

12 WHEREFORE, the Committee respectfully requests entry of an order granting the relief
13 requested in this Motion to Shorten as set forth in the proposed order at **Exhibit A**, and such other
14 and further relief as the Court may deem just and proper.

15
16 Dated: October 24, 2025

PACHULSKI STANG ZIEHL & JONES LLP

17 /s/ John D. Fiero

18 John D. Fiero

19 *Counsel to the Official Committee*
20 *of Unsecured Creditors*
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EXHIBIT A

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*Counsel to the Official
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re
LEFEVER MATTSON, a California
corporation, *et al.*,
Debtors.²

In re
KS MATTSON PARTNERS, LP,
Debtor.

Case No. 24-10545 CN (Lead Case)

(Jointly Administered)

Chapter 11

**[PROPOSED] ORDER SHORTENING
TIME FOR A HEARING ON MOTION TO
DECLARE VOID ACTIONS IN
VIOLATION OF THE AUTOMATIC STAY
RELATED TO LIVE OAK INVESTMENTS,
LP**

Upon consideration of the *Ex Parte Motion of the Official Committee of Unsecured Creditors Pursuant to B.L.R. 9006-1 for an Order Shortening Time for a Hearing on Motion to Declare Void Actions in Violation of the Automatic Stay Related to Live Oak Investments, LP* (the “Motion to Shorten”); the Court having reviewed the *Motion to Declare Void Actions in Violation of the Automatic Stay Related to Live Oak Investments, LP* (the “Stay Violation Motion”); and the Court having found that it has jurisdiction to consider the Motion to Shorten and the relief requested in the

² 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>.

1 Motion to Shorten pursuant to 28 U.S.C. §§ 157 and 1334, and the Order Referring Bankruptcy
2 Cases and Proceedings to Bankruptcy Judges; and the Court having found that venue is proper in this
3 district pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that this is a core
4 proceeding pursuant to 28 U.S.C. § 157(b); and good and sufficient cause having been shown;

5 **IT IS HEREBY ORDERED THAT:**

6 1. The Motion to Shorten is GRANTED.

7 2. A hearing on the Stay Violation Motion shall be held on _____, 2025 at
8 _____ a.m./p.m.. (Pacific Time) (the "Hearing").

9 3. Any response to the Stay Violation Motion must be filed by _____,
10 2025.

11 4. The Official Committee of Unsecured Creditors (the "Committee") shall promptly
12 serve a copy of this Order on (i) the United States Trustee; (ii) counsel to the Debtors; (iii) purported
13 counsel to Live Oak; (iv) the investors of Live Oak who received notice of the October 9, 2025
14 partnership meeting and their counsel, if known; and (v) those persons who have formally appeared
15 in this case and requested service pursuant to Federal Rule of Bankruptcy Procedure 2002. No other
16 notice is required.

17 5. The Committee is authorized to take all steps necessary or appropriate to carry out
18 this Order.

19 6. This Court shall retain jurisdiction to hear and determine all matters arising from or
20 related to the implementation, interpretation, or enforcement of this Order.

21 ****END OF ORDER****
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