

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

In re:

LEFEVER MATTSON, a California
corporation, *et al.*,¹

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**COVER SHEET TO SECOND INTERIM
FEE APPLICATION OF KURTZMAN
CARSON CONSULTANTS, LLC DBA
VERITA GLOBAL AS ADMINISTRATIVE
ADVISOR FOR DEBTORS AND DEBTORS
IN POSSESSION FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD MAY 1, 2025 THROUGH
AUGUST 31, 2025.**

In re

KS MATTSON PARTNERS, LP,

Debtor.

Date: TBD

Time: TBD

Place: **(In Person or Via Zoom)**

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

Objection Deadline: TBD

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>.



Name of Applicant: Kurtzman Carson Consultants, LLC dba Verita Global

Authorized to Provide Professional Services to: LeFever Mattson, a California corporation, *et al.*

Petition Date: August 6, 2024²

Retention Date: August 6, 2024, by Order dated November 1, 2024

Interim Fee Period: May 1, 2025, through August 31, 2025

This is an: X interim final application.

SUMMARY OF MONTHLY FEE STATEMENTS

Date Filed	Period Covered	Requested Fees	Requested Expenses	Paid Fees	Paid Expenses	Total Fees Requested (including holdback)
10/7/2025	8/1/2025 – 8/31/2025	\$1,155.06 (80% of \$1,443.83)	\$0.00	\$0.00	\$0.00	\$1,443.83

Summary of Any Objections to Monthly Fee Statements: None

² One Debtor, Windscape Apartments, LLC, filed a chapter 11 petition in this Court on August 6, 2024 (the “Windscape Petition Date”). LeFever Mattson and 57 other Debtors filed chapter 11 petitions in this Court on September 12, 2024 (the “LeFever Mattson Petition Date”). Two Debtors, Pinewood Condominiums, LP and Ponderosa Pines, LP, filed chapter 11 petitions in this Court on October 2, 2024 (the “Pinewood-Ponderosa Petition Date,” and, together with the Windscape Petition Date and the LeFever Mattson Petition Date, the “Petition Dates”).

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Schedules & SOFAs	6.6	\$1,443.83
Totals	6.6	\$1,443.83

COMPENSATION BY INDIVIDUAL

Initials	Name	Position	Hours	Rate	Total
AAE	Andres Estrada	Solicitation Consultant ³	0.3	\$224.25	\$ 67.28
DPM	Daniel McSwigan	Solicitation Consultant	6.3	\$218.50	\$ 1,376.55
	TOTALS		6.6		\$ 1,443.83

Total Incurred:	\$1,443.83
Blended Rate:	\$218.76

³ At the hearing on Verita's previous interim fee application, the Court inquired as to the meaning of the "Solicitation Consultant" title of certain Verita employees. As disclosed on the Verita fee structure, the Solicitation Consultant is the day-to-day contact and handles services related not only to the solicitation but Schedule and SOFA services and other additional complex consulting tasks.

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**UNITED STATES BANKRUPTCY COURT
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Debtors.

In re

KS MATTSON PARTNERS, LP,

Debtor.

Lead Case No. 24-10545 (CN)

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Chapter 11

**SECOND INTERIM FEE
APPLICATION OF KURTZMAN
CARSON CONSULTANTS, LLC DBA
VERITA GLOBAL AS
ADMINISTRATIVE ADVISOR FOR
DEBTORS AND DEBTORS IN
POSSESSION FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD MAY 1, 2025,
THROUGH AUGUST 31, 2025**

Date: TBD

Time: TBD

Place: **(In Person or Via Zoom)**

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

Objection Deadline: TBD

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1 Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”), administrative advisor to the
2 above-captioned debtors and debtors in possession (collectively, the “Debtors”) in these chapter 11 cases
3 (the “Chapter 11 Cases”) hereby submits its Second Interim Fee Application (the “Interim Application”),
4 for an order, in substantially the form attached hereto as **Exhibit A**, pursuant to sections 330 and 331 of
5 title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy
6 Procedure (the “Bankruptcy Rules”), the *Guidelines for Compensation and Expense Reimbursement of*
7 *Professionals and Trustees* (the “Northern District Guidelines”), the Bankruptcy Local Rules for the
8 Northern District of California (the “Local Rules”), and the *Order Granting Motion of Debtors to*
9 *Establish Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt.
10 No. 356] (the “Interim Fee Order”) entered by the Court on November 18, 2024, for interim approval and
11 allowance of (i) compensation for professional services rendered to the Debtors from May 1, 2025,
12 through and including August 31, 2025 (the “Interim Fee Period”), and (ii) reimbursement of expenses
13 incurred in connection with such services; and, in support thereof, respectfully represents as follows:

14 **JURISDICTION**

15 1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334,
16 the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D.
17 Cal.), and Rule 5011-1(a) of the Local Rules. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
18 Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

19 **CASE BACKGROUND AND STATUS**

20 **A. General Background**

21 2. Debtor Windscape Apartments, LLC, filed its chapter 11 petition on August 6, 2024. Fifty-
22 eight Debtors, including LeFever Mattson, filed their chapter 11 petitions on September 12, 2024. Debtors
23 Pinewood Condominiums, LP, and Ponderosa Pines, LP, filed their chapter 11 petitions on October 2,
24 2024.

25 3. The Debtors continue to operate their businesses and manage their properties as debtors in
26 possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The United States Trustee
27 appointed an official committee of unsecured creditors (the “Committee”) in the Chapter 11 Cases on
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October 9, 2024, [Dkt. No. 135] and amended the appointment on November 25, 2024 [Dkt. No. 368] and on August 26, 2025 [Dkt. No. 2104], confirming that the Committee would be the official committee in the KSMP Chapter 11 Case. No trustee or examiner has been appointed in these Chapter 11 Cases.

4. Additional background information on these Chapter 11 Cases is present in the *Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions* [Dkt. No. 5].

B. Summary of Professional Compensation and Reimbursement of Expenses Requested

5. By this Interim Application, Verita seeks interim allowance of compensation in the amount of \$1,443.83. Verita is not seeking reimbursement of any expenses in this Interim Application. Attached hereto as **Exhibit B** is an accurate and complete copy of itemized invoices detailing all fees and expenses accrued during the Interim Fee Period.

6. All services for which Verita requests compensation were performed for or on behalf of the Debtors. Verita has received no promises for payment from any source other than the Debtors for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Interim Application. To date, Verita has not been paid for any amounts in connection with its monthly fee statement.

7. Verita has billed the Debtors in accordance with its existing billing rates and procedures in effect during the Interim Fee Period. These rates are the same rates Verita charges for services rendered by its professionals in comparable matters and are reasonable given the compensation charged by comparably skilled practitioners in similar matters in both the California and national markets. The Summary Sheet filed herewith contains tables listing the Verita professionals who have performed services for the Debtors during the Interim Fee Period, including their job titles, hourly rates, and aggregate numbers of hours worked in this matter. The Summary Sheet also contains a table summarizing the hours worked by Verita's professionals broken down by project category. Verita maintains computerized time records, which have been filed on the docket with Verita's monthly fee statements.

SUMMARY OF SERVICES PERFORMED

8. During the Interim Fee Period, Verita's professionals performed 6.6 hours assisting the Debtors and their professionals with the preparation of their amended Schedules of Assets and Liabilities

1 and Statements of Financial Affairs (the “Amended Schedules and Statements”). This included frequent
2 communication with the Debtors and their professionals regarding data, preparing the Amended Schedules
3 and Statements, and performing quality assurance related thereto.

4 **LEGAL BASIS FOR INTERIM COMPENSATION**

5 9. The professional services for which Verita requests interim allowance of compensation and
6 reimbursement of expenses were rendered and incurred in connection with these Chapter 11 Cases in the
7 discharge of Verita’s professional responsibilities as administrative advisor for the Debtors in these
8 Chapter 11 Cases. Verita’s services have been necessary and beneficial to the Debtors, their estates, the
9 secured and unsecured creditors, and other parties in interest.

10 10. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, Verita
11 respectfully submits that the amount requested by Verita is fair and reasonable given the complexity of
12 these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of
13 such services, and the costs of comparable services other than in a case under the Bankruptcy Code.
14 Moreover, Verita has reviewed the requirements of the Interim Fee Order, and the Northern District
15 Guidelines, and believes that the Interim Application complies.

16 **AVAILABLE FUNDS**

17 11. Verita understands that the Debtors’ estates have sufficient funds available to pay the fees
18 and costs sought herein.

19 **NOTICE**

20 Notice of the Interim Application has been provided to parties in interest in accordance with the
21 procedures set forth in the Interim Fee Order. Verita submits that, in view of the facts and circumstances
22 of the Chapter 11 Cases, such notice is sufficient, and no other or further notice need be provided.

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1 **CONCLUSION**

2 Verita respectfully requests an interim allowance to Verita as compensation for fees in the amount
3 of \$1,443.83 and actual and necessary expenses in the amount of \$0.00, for a total allowance of
4 \$1,443.83; and for such other and further relief as this Court deems proper.

5
6 Dated: October 28, 2025

7 /s/ Sarah Harbuck
8 Sarah Harbuck

9 Kurtzman Carson Consultants, LLC
10 dba Verita Global
11 222 N Pacific Coast Highway,
12 3rd Floor
13 El Segundo, CA 90245

14 *Administrative Advisor to the Debtors*
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1 **CERTIFICATION**

2 I, Sarah Harbuck, pursuant to 28 U.S.C. § 1746 and the Northern District Guidelines, state
3 as follows:

- 4 a) I am Assistant General Counsel of the applicant firm, Kurtzman Carson
5 Consultants, LLC dba Verita Global ("Verita").
6 b) I have read the Interim Application.
7 c) To the best of my knowledge, information, and belief formed after reasonable
8 inquiry, the compensation sought in the Interim Application is in conformity
9 with the Northern District Guidelines.
10 d) The compensation requested in the Interim Application is billed at rates in
11 accordance with practices no less favorable than those customarily employed
12 by the Applicant and generally accepted by the Applicant's clients.

13 I certify, under penalty of perjury, that the foregoing statements are true to the best of my
14 knowledge, information, and belief.

15 Dated: October 28, 2025

16 El Segundo, California

/s/ Sarah Harbuck

17 Sarah Harbuck
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EXHIBIT A

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**UNITED STATES BANKRUPTCY COURT
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In re:

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Debtors.

In re

KS MATTSON PARTNERS, LP,

Debtor.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**[PROPOSED] ORDER GRANTING
SECOND INTERIM FEE
APPLICATION OF KURTZMAN
CARSON CONSULTANTS, LLC
DBA VERITA GLOBAL AS
ADMINISTRATIVE ADVISOR FOR
DEBTORS AND DEBTORS IN
POSSESSION FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
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FOR THE PERIOD MAY 1, 2025,
THROUGH AUGUST 31, 2025**

Date: TBD

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United States Bankruptcy Court

1300 Clay Street, Courtroom

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1 Upon consideration of the Second Interim Fee Application of Kurtzman Carson
2 Consultants, LLC dba Verita Global as Administrative Advisor for Debtors and Debtors in
3 Possession for Allowance and Payment of Compensation and Reimbursement of Expenses for the
4 Period May 1, 2025, through August 31, 2025 (the “Interim Application”) and this Court having
5 jurisdiction to consider the Interim Application and the relief requested therein pursuant to 28
6 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy
7 Judges, General Order 24 (N.D. Cal), and Rule 5011-1(a) of the Bankruptcy Local Rules for the
8 United States District Court for the Northern District of California; and consideration of the
9 Interim Application and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157;
10 and due and proper notice of the Interim Application having been provided; and this Court having
11 reviewed the Interim Application; and, upon the record and all of the proceedings had before the
12 Court; and this Court having found and determined that the relief sought in the Interim Application
13 is in the best interests of the Debtors, their estates, creditors, and all the parties in interest; and that
14 the legal and factual bases set forth in the Interim Application establish just cause for the relief
15 granted herein; and after due deliberation and sufficient cause appearing therefor,

16 **IT IS HEREBY ORDERED THAT:**

- 17 1. The Interim Application is granted as provided herein.
- 18 2. Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”) is awarded an
19 interim allowance of its compensation for professional services rendered in the amount of
20 \$1,443.83.
- 21 3. The Debtors are authorized and directed to pay Verita the fees awarded and
22 allowed under this Order, or \$1,443.83.
- 23 4. The Court shall retain jurisdiction to determine any controversy arising in
24 connection with this Order.

25 **END OF ORDER**

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EXHIBIT B

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September 12, 2025

LeFever Mattson, Inc.
Mark Bennett
6359 Auburn Blvd., Suite B
Citrus Heights CA 95621
United States

Re: LeFever Mattson, Inc.
USBC Case No. 24-10545

Dear Mark Bennett,

Enclosed please find Kurtzman Carson Consultants, LLC dba Verita Global's ("Verita's") invoice for the period August 1, 2025 to August 31, 2025 in the amount of \$1,443.83 for the above referenced matter. Pursuant to our services agreement, Verita's invoice is due upon receipt.

If you have any questions, please contact me at (310) 751-1803 or EGershbein@VeritaGlobal.com

Sincerely,
Verita Global, LLC



Evan Gershbein
EVP Restructuring

Enclosures

9/12/2025

Contact Parties

Brooke E. Wilson
Pachulski Stang Ziehl & Jones LLP
One Sansome Street, 34th Floor, Suite 3430
San Francisco CA 94104
United States

David Taylor
Keller Benvenuti Kim LLP
425 Market Street, 26th Floor
San Francisco CA 94105
United States

Deanna Hazelton
Office of the United States Trustee
2500 Tulare Street, Suite 1401
Fresno CA 93721
United States

Debra I. Grassgreen
Pachulski Stang Ziehl & Jones LLP
One Sansome Street, 34th Floor, Suite 3430
San Francisco CA 94104
United States

Jared Day
C. Clifton Young Federal Building
300 Booth Street, Room 3009
Reno NV 89509
United States

Jason H. Rosell
Pachulski Stang Ziehl & Jones LLP
One Sansome Street, 34th Floor, Suite 3430
San Francisco CA 94104
United States

John D. Fiero
Pachulski Stang Ziehl & Jones LLP
One Sansome Street, 34th Floor, Suite 3430
San Francisco CA 94104
United States

Phillip Shine
Office of the United States Trustee
450 Golden Gate Avenue, 5th Floor, Suite #05-0153
San Francisco CA 94102
United States

Shelly L. Cuff
Development Specialists, Inc.
333 South Grand Avenue, Suite 4100
Los Angeles CA 90071
United States

Thomas Rupp
Keller Benvenuti Kim LLP
425 Market Street, 26th Floor
San Francisco CA 94105
United States

Keller Benvenuti Kim LLP
425 Market Street, 26th Floor
San Francisco CA 94105
United States

Verita Global LLC

Account Number	2410545FA	Invoice Date	September 12, 2025
Invoice Number	US-RESTR2710711	Due Date	Due upon receipt

LeFever Mattson, Inc.

Summary

<u>Description</u>	<u>Amount</u>
<u>Hourly Fees</u>	
Hourly Fees Charged	\$1,443.83
Total of Hourly Fees	\$1,443.83
<u>Expenses</u>	
Expenses	\$0.00
Total Expenses	\$0.00
Invoice Subtotal	\$1,443.83
Sales and Use Tax	\$0.00
Total Invoice	\$1,443.83

Please detach and return this portion of the statement with your check to KCC.

Please reference your Account Number and Invoice Number on your Remittance.

Account Number	2410545FA	Check Payments to:	Wire Payments to:
Invoice Number	US-RESTR2710711	Verita Global LLC Department 2211 PO Box 4110 Woburn, MA 01888-4110	Verita Global LLC Grasshopper Bank, N.A. 261 5th Avenue Suite 610 New York, NY 10016 Account # 02329451396 FED ABA # 026015024
Total Amount Due	\$1,443.83		
Amount Paid	\$		

Verita Global LLC

8/1/2025 - 8/31/2025

Total Hourly Fees by Employee

<u>Initial</u>	<u>Employee Name</u>	<u>Position Type</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
AAE	Andres Estrada	SOL	0.3	\$224.25	\$67.28
DPM	Daniel McSwigan	SOL	6.3	\$218.50	\$1,376.55

Verita Global LLC

8/1/2025 - 8/31/2025

Time Detail

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Position Type</u>	<u>Category</u>	<u>Hours</u>
8/27/2025	DPM	Review schedule amendments for accuracy and completeness per email correspondence from S. Cuff of DSI	SOL	Schedules & SOFA	0.2
8/29/2025	AAE	Review schedules and statement amendment data files from DSI	SOL	Schedules & SOFA	0.3
8/29/2025	DPM	Review proposed amendments to schedules and statements from DSI	SOL	Schedules & SOFA	0.8
8/30/2025	DPM	Review tracking sheet of required schedule and statement amendments by debtor	SOL	Schedules & SOFA	1.1
8/31/2025	DPM	Prepare amended schedules D, E, F, G and H	SOL	Schedules & SOFA	4.2

Verita Global LLC

8/1/2025 - 8/31/2025

Expenses

<u>Description</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
Printing and Mailing Expenses			\$0.00
		Total Expenses	\$0.00

Verita Global LLC

8/1/2025 - 8/31/2025

Printing and Mailing Expenses

<u>Post Date</u>	<u>Mailing Name</u>	<u>Quantity</u>	<u>Description</u>	<u>Rate</u>	<u>Total</u>
Total Printing and Mailing Expenses					\$0.00