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6 Attorneys for CHASE 1992 FAMILY TRUST

8 UNITED STATES BANKRUPTCY COURT

9 NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

11 In re
 12 LEFEVER MATTSON, a California
 corporation, et al,

13 Debtors.

Case No. 24-10545 (CN)
 (Jointly Administered)
 Chapter 11

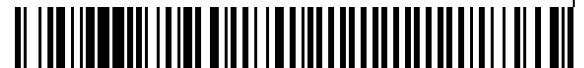
**MOTION TO DESIGNATE THE CHASE
 1992 FAMILY TRUST AS A
 “PERMITTED PARTY” UNDER THAT
 ORDER (1) ESTABLISHING BAR DATE,
 (2) APPROVING FORM AND MANNER
 OF BAR DATE NOTICE AND RELATED
 PROCEDURES, AND (3) APPROVING
 CONFIDENTIALITY PROTOCOLS [ECF
 NO. 459]**

14 In re
 15 KS MATTSON PARTNERS, LP,
 16 Debtor,

18 Date: November 19, 2025
 19 Time: 11:00 a.m.
 Judge: Hon. Charles D. Novack

21 The Chase 1992 Family Trust (the “Chase Trust”) requests an order from this Court
 22 designating the Chase Trust a “Permitted Party” under the Court’s Order Establishing Bar Date,
 23 Approving Form and Manner of Bar Date Notice and Related Procedures, and Approving
 24 Confidentiality Protocols (ECF Nos. 366; 459) (the “Confidentiality Protocols”). The Chase Trust
 25 is a limited partners of Live Oak Investments, LP (“Live Oak”) and desires to investigate investor
 26 proofs of claims filed against Live Oak. Specifically, the Chase Trust seeks to investigate alleged
 27 “off-book” investor claims against Live Oak.

28 ///



I.
FACTUAL BACKGROUND

A. Prepetition Factual Background

The Chase Trust invested in Live Oak in 2010 by purchasing a 9.532% limited partnership interest from LeFever Mattson, Inc. When the KS Mattson/LeFever Mattson fraud scheme began to unravel, LeFever Mattson retained the CRO, Bradley Sharp, first as financial consultant and later as chief restructuring officer, to manage its affairs. The CRO was first retained on July 18, 2024.

B. The Sale of Live Oak's only Real Property Asset Days Before the Bankruptcy

On August 29, 2024, Live Oak sold its only tangible asset – a property located at 410 Buck Avenue, Vacaville, California (“Southwood Apartments”) – for \$10,800,000. (ECF No. 319, Statement of Financial Affairs, Question 13.) From those funds, on September 5, 2025, Live Oak was caused to make a payment of \$324,000 to LeFever Mattson, a California corporation for a “general partnership fee” and a payment to LeFever Mattson, a California corporation, of \$842,418 for an “ownership distribution.” (ECF No. 642, p.2, fn. 3.) Also from those funds, Live Oak paid the sum of \$6,718,000 to Walker & Dunlop, LLC (“Walker & Dunlop”), purportedly to satisfy a loan secured by the real estate. In one week, while controlled by LeFever Mattson, Inc., Debtor made payments to LeFever Mattson, Inc. in the amount of \$1,166,418. No ownership distributions – or any other payments – were made to Live Oak’s limited partners. Both LeFever Mattson, Inc. and Live Oak commenced these Chapter 11 cases one week later on September 12, 2024.

C. Live Oak's Assets and Liabilities

Live Oak’s Schedules of Assets and Liabilities shows that its assets essentially consist of cash in bank accounts and claims against other LeFever Mattson debtors. (ECF No. 319.) Debtor has no real estate and no operations.

Debtor holds \$3,061,049.48 in cash in two bank accounts. (*Id.* at 3.) It has \$3,240,830 in notes receivable owed by related LeFever Mattson debtors. (*Id.* at 13, Schedule A/B 71.) Debtor also holds claims for avoidance and recovery of the prepetition “Owner Distributions” and “General Partnership Fee” made by Live Oak to LeFever Mattson in the aggregate amount of \$1,166,418. The Debtor’s schedules show that liabilities total \$23,615.20, and those liabilities are purportedly

1 owed to LeFever Mattson and one of its affiliates. A bar date occurred in this case on February 14,
2 2025.

3 **D. Live Oak Investors**

4 On November 15, 2024, LeFever Mattson, Inc. filed an Omnibus List of Equity Security
5 Holders (Docket No. 353) identifying the equity security holders of each of the debtor entities,
6 including Live Oak. Per the Omnibus List of Equity Security Holders, Live Oak has 11 investors,
7 including LeFever Mattson, Inc. According to the Omnibus List of Equity Security Holders, the
8 respective investors' equity interests in Live Oak, total 100% of ownership of Live Oak. Said
9 another way, the Omnibus List of Equity Security Holders represents that all of Live Oak's
10 ownership interest is accounted for.

11 **E. The Confidentiality Protocols**

12 On or about December 13, 2024, the Court entered an order establishing a claims bar date,
13 approving the form and manner of notice of the bar date and procedures with respect thereto, and
14 approving confidentiality protocols. (Docket No. 459.) Under the Confidentiality Protocols,
15 investors were directed not to file a Proof of Interest Form or Proof of Claim form with the Court.
16 (Docket No. 366.) Accordingly, the Chase Trust has not had the ability to review any Proofs of
17 Interest or Proofs of Claim against Live Oak.

18 **F. The Proposed Chapter 11 Plan**

19 On or about September 5, 2025, LeFever Mattson filed its proposed Chapter 11 Plan of
20 Liquidation. (Docket No. 2226) (the "Chapter 11 Plan".) The Chapter 11 Plan proposes a "single
21 pot" in which investors may receive distributions from. A significant term, perhaps the most
22 significant term, of the Chapter 11 Plan is that LeFever Mattson, all of its affiliated debtor-entities,
23 and KS Mattson Partners, LP shall be substantively consolidated and the assets of each debtor shall
24 be pooled together. This includes Live Oak.

25 **G. Bradley Sharp's Deposition**

26 On or about September 22, 2025, the Chase Trust took Mr. Sharp's deposition. Mr. Sharp
27 testified that he believes there are "off-book" investors in Live Oak. (Declaration of Daniel L. Egan
28 ("Egan Dec.") ¶ 3; Exhibit B.) Mr. Sharp does not know who these off-book investors are. (*Id.*)

1 As a limited partner of Live Oak, the Chase Trust seeks an order designating it a “permitted
2 party” under the Confidentiality Protocols so that it may adequately investigate the claims against
3 Live Oak. Specifically, the Chase Trust seeks to investigate the “off-book” investors in Live Oak to
4 allow the Chase Trust to sufficiently vote on the Chapter 11 Plan of Liquidation.

5 **II.**
6 **DISCUSSION**

7 The Confidentiality Protocols allow permitted parties to access proof of claims for Debtor.
8 The Permitted Parties include “[s]uch other persons as the Court allows after notice and an
9 opportunity for hearing; *provided, however*, that any such determination shall be made on no less
10 than fourteen days’ prior notice to affected Investors.” (ECF Nos. 366; 459 (emphasis original).)

11 The Chase Trust respectfully requests the Court enter an order designating the Chase Trust
12 as a Permitted Party so that it may review the proofs of interest related to Live Oak. Live Oak’s
13 CRO testified under oath that he believes there are off-book investors, but could not recall the
14 number or identity of these investors. (Egan Dec. ¶ 3; Exhibit A.) This is critical and concerning
15 because Live Oak’s proposed Chapter 11 Plan of Liquidation calls for substantive consolidation
16 between LeFever Mattson and its affiliates, including Live Oak, as well as the bankruptcy estate of
17 KS Mattson Partners, LP. (ECF No. 2226.)

18 The Chase Trust has invested significant sums in Live Oak, and until the Chase Trust has
19 information regarding the off-book investors, the Chase Trust lacks sufficient information to allow
20 it to vote on the proposed Chapter 11 Plan of Liquidation. If there are a large number of off-book
21 investors, then the Chase Trust’s distribution will necessarily be reduced by the number of off-book
22 investors. The Chase Trust cannot make an informed vote on the Chapter 11 Plan of Liquidation
23 without information about the off-book investors. Reviewing the proofs of interest and proofs of
24 claim filed against Live Oak will enable the Chase Trust to make an informed decision on the
25 Chapter 11 Plan.

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III.
SUPPORTING AUTHORITY

This motion is supported by the accompanying Notice, Declaration of Daniel L. Egan, a [Proposed] Order, and all pleadings and papers on file in this case.

IV.
REQUEST FOR RELIEF

For the foregoing reasons, the Chase Trust respectfully requests the Court to enter an Order:

1. Designating the Chase 1992 Family Trust as a “Permitted Party” pursuant to this Court’s Order establishing Confidentiality Protocols;
2. Directing the claims administrator to turn over all proofs of claim and proofs of interest filed against Live Oak Investments, LP to counsel to the Chase 1992 Family Trust within fourteen (14) days of entry of this order; and
3. For such other and additional relief as the Court deems appropriate.

DATED: October 29, 2025

WILKE FLEURY LLP

By:



DANIEL L. EGAN

Attorneys for CHASE 1992 FAMILY TRUST

EXHIBIT A

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6 Attorneys for CHASE 1992 FAMILY TRUST

7
8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION
10

11 In re
12 LEFEVER MATTSON, a California
13 corporation, et al,
14 Debtors.

Case No. 24-10545 (CN)
(Jointly Administered)
Chapter 11

**ORDER GRANTING MOTION TO
DESIGNATE THE CHASE 1992 FAMILY
TRUST AS A “PERMITTED PARTY”
UNDER THAT ORDER (1)
ESTABLISHING BAR DATE, (2)
APPROVING FORM AND MANNER OF
BAR DATE NOTICE AND RELATED
PROCEDURES, AND (3) APPROVING
CONFIDENTIALITY PROTOCOLS [ECF
NO. 459]**

Date: November 19, 2025
Time: 11:00 a.m.
Place: 1300 Clay Street, Courtroom 215
Oakland, CA 94612

The Hon. Charles D. Novack

22
23 The motion of Chase 1992 Family Trust (“Chase Trust”) to designate the Chase Trust as a
24 “permitted party” under the confidentiality protocols applicable to this case (ECF Nos. 366; 459),
25 having been filed, the Court having held a hearing, and good cause appearing:

26 It is hereby ORDERED that:

27 1. The Chase 1992 Family Trust is designated a “permitted party” as defined in the
28 confidentiality protocols (ECF Nos. 366; 459); and

1 2. The claims administrator is ordered to produce all filed proofs of interest and proofs
2 of claim filed against Live Oak Investments, LP to counsel for the Chase Trust within 14 days of
3 this Order.

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5 ****END OF ORDER****
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1 **PROOF OF SERVICE**

2 **24-10545 (CN)**

3 **STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

4 At the time of service, I was over 18 years of age and not a party to this action. I am
5 employed in the County of Sacramento, State of California. My business address is 621 Capitol
Mall, Suite 900, Sacramento, CA 95814.

6 On October 29, 2025, I served true copies of the following document(s) described as

7 **1. NOTICE OF HEARING ON MOTION TO DESIGNATE THE CHASE 1992**
8 **FAMILY TRUST AS A “PERMITTED PARTY” UNDER THAT ORDER (1)**
9 **ESTABLISHING BAR DATE, (2) APPROVING FORM AND MANNER OF BAR DATE**
10 **NOTICE AND RELATED PROCEDURES, AND (3) APPROVING CONFIDENTIALITY**
11 **PROTOCOLS [ECF NO. 459];**

12 **2. MOTION TO DESIGNATE THE CHASE 1992 FAMILY TRUST AS A**
13 **“PERMITTED PARTY” UNDER THAT ORDER (1) ESTABLISHING BAR DATE, (2)**
14 **APPROVING FORM AND MANNER OF BAR DATE NOTICE AND RELATED**
15 **PROCEDURES, AND (3) APPROVING CONFIDENTIALITY PROTOCOLS [ECF NO.**
16 **459]; and**

17 **3. DECLARATION OF DANIEL L. EGAN IN SUPPORT OF MOTION TO**
18 **DESIGNATE THE CHASE 1992 FAMILY TRUST AS A “PERMITTED PARTY” UNDER**
19 **THAT ORDER (1) ESTABLISHING BAR DATE, (2) APPROVING FORM AND MANNER**
20 **OF BAR DATE NOTICE AND RELATED PROCEDURES, AND (3) APPROVING**
21 **CONFIDENTIALITY PROTOCOLS [ECF NO. 459].**

22 on the interested parties in this action as follows:

23 **SEE ATTACHED SERVICE LIST**

24 ☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the
25 document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the
26 case who are registered CM/ECF users will be served by the CM/ECF system. Participants
27 in the case who are not registered CM/ECF users will be served by mail or by other means
28 permitted by the court rules.

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

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18
19 ☒ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the
20 persons at the addresses listed in the Service List and placed the envelope for collection and
21 mailing, following our ordinary business practices. I am readily familiar with Wilke
22 Fleury LLP's practice for collecting and processing correspondence for mailing. On the
same day that correspondence is placed for collection and mailing, it is deposited in the
ordinary course of business with the United States Postal Service, in a sealed envelope with
postage fully prepaid.

SERVICE LIST

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Bashar Ahmad
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555 Capitol Mall, Suite 1500
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9 **Perry, Johnson, Anderson, Miller**
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11 **Santa Rosa, CA 95401**

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Alexander A. Wiegel
Perry, Johnson, Anderson, Miller
438 1st Street, 4th Floor
Santa Rosa, CA 9540

15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing is true and correct and that I am employed in the office of a member of the bar of this
17 Court at whose direction the service was made.

18 Executed on October 29, 2025, at Sacramento, California.

19 

20 _____
21 Stephanie Douglas
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6 Attorneys for CHASE 1992 FAMILY TRUST

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8 UNITED STATES BANKRUPTCY COURT
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11 In re
12 LEFEVER MATTSON, a California
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13 Debtors.
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Case No. 24-10545 (CN)
(Jointly Administered)
Chapter 11

**DECLARATION OF DANIEL L. EGAN IN
SUPPORT OF MOTION TO DESIGNATE
THE CHASE 1992 FAMILY TRUST AS A
“PERMITTED PARTY” UNDER THAT
ORDER (1) ESTABLISHING BAR DATE,
(2) APPROVING FORM AND MANNER
OF BAR DATE NOTICE AND RELATED
PROCEDURES, AND (3) APPROVING
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NO. 459]**

Date: November 19, 2025
Time: 11:00 a.m.
Place: 1300 Clay Street, Courtroom 215
Oakland, CA 94612

The Hon. Charles D. Novack

22 I, Daniel L. Egan, declare as follows:

23 1. I am an attorney licensed to practice law before all the Courts of the State of
24 California and a partner with the law firm of Wilke Fleury LLP, counsel of record in this matter for
25 CHASE 1992 FAMILY TRUST. I have personal knowledge of the matters stated herein and, if
26 called to do so, could and would competently testify thereto. I submit this Declaration in support of
27 The Chase 1992 Family Trust’s Motion to be Designated as a “Permitted Party” Under the Court’s
28 Confidentiality Protocols. I submit this Declaration from my own personal knowledge. If called to

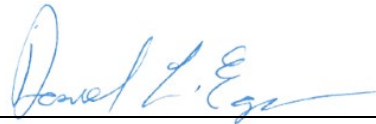
1 do so, I could and would competently testify to the facts stated herein.

2 2. On September 22, 2025, I deposed Bradley Sharp, Chief Restructuring Officer for
3 Debtor LeFever Mattson, Inc. (the "Debtor").

4 3. A true and correct copy of pages 1, 115, and 145 of the September 22, 2025,
5 deposition of Bradley Sharp is attached hereto as **Exhibit B**.

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

8 Executed October 28, 2025, at Sacramento, California.

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11 Daniel L. Egan
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EXHIBIT B

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

In Re:)
)
LEFEVER MATTSON, a California)
)
corporation, et al.,)
)
) NO. 24-10545 (CN)
) (Lead case)
-----)

DEPOSITION OF
BRADLEY SHARP
(Via Videoconference)

Monday, September 22, 2025
12:32 p.m. - 3:56 p.m.

Videoconference deposition of BRADLEY SHARP, noticed
by the Defendant in the above-entitled action, taken before

Ruben Garcia, a shorthand reporter within and for the State

of California.

1 with through the bankruptcy court.

2 BY MR. EGAN:

3 Q And a claims bar date occurred on
4 February 14 of 2025; is that correct?

5 A Correct.

6 Q And that's the kind of process you're
7 talking about that would identify off-book investors;
8 is that correct?

9 A That's correct.

10 Q As to Live Oak right now, how many
11 off-book investors filed claims prior to February 15
12 of 2025?

13 MR. TAYLOR: I know you're reading from
14 notes, but you're repeating questions over and over
15 that have been asked.

16 MR. EGAN: I don't think so.

17 MR. TAYLOR: He asked that exact same
18 question. Mr. Sharp said, "I don't recall. I'll have
19 to look." He can say it again. But we're wasting
20 time.

21 THE WITNESS: I'm not doing the claims
22 process. The claims process is done by Price
23 Waterhouse Coopers supervised by the committee. So I
24 know there are off-book claimants, but I can't give
25 you the details as I sit here.

1 STATE OF CALIFORNIA)
) ss:

2 COUNTY OF LOS ANGELES)
3

4 I, RUBEN GARCIA, CSR, do hereby certify that I am a
5 duly qualified Certified Shorthand Reporter, in and for the
6 State of California, holder of Certificate Number 11305,
7 which is in full force and effect.

8 That the foregoing reporter videoconference
9 proceedings were taken before me at the time herein set
10 forth; that any witness in the foregoing proceedings, prior
11 to testifying, were placed under oath; that every attempt
12 was made to ensure a verbatim record of the remote
13 proceedings which inherently have technical interference
14 and audio interruptions and issues. Such transcript was
15 created by me using machine shorthand which was thereafter
16 transcribed under my direction.

17 I further certify that I am not a relative or
18 employee or attorney or counsel of any of the parties nor
19 am I financially interested in the outcome of this action.

20 IN WITNESS WHEREOF, I have subscribed my name
21 this 27th day of September, 2025.

22

23

Ruben Garcia

RUBEN GARCIA, CSR NO. 11305

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25