

Debra I. Grassgreen (CA Bar No. 169978)
 John D. Fiero (CA Bar No. 136557)
 Jason H. Rosell (CA Bar No. 269126)
 PACHULSKI STANG ZIEHL & JONES LLP
 One Sansome Street, Suite 3430
 San Francisco, California 94104
 Telephone: (415) 263-7000
 Email: dgrassgreen@pszjlaw.com
 jfiero@pszjlaw.com
 jrosell@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.

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

In re
 KS MATTSON PARTNERS, LP,
 Debtor.

***EX PARTE APPLICATION OF THE
 OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS FOR ENTRY
 OF AN ORDER PURSUANT TO
 BANKRUPTCY RULE 2004
 AUTHORIZING ORAL EXAMINATION
 OF AND PRODUCTION OF
 DOCUMENTS BY KATHLEEN L.
 HAMLIN, TRUSTEE OF THE
 KATHLEEN HAMLIN LIVING TRUST
 DATED JULY 2, 2008***

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 bankruptcy cases (the “Cases”) hereby files this *ex parte* application (the “Application”) under Federal Rule of Bankruptcy Procedure 2004 (“Rule 2004”) and Local Bankruptcy Rule 2004-1 (“Local Rule 2004-1”) for entry of an order authorizing the Committee to issue a subpoena to **Kathleen L. Hamlin, Trustee of the Kathleen Hamlin Living Trust Dated July 2, 2008 (“Ms. Hamlin”).**



1 The Committee's proposed subpoena will provide that Ms. Hamlin shall (a) complete her
2 production, by **January 9, 2026**, of documents responsive to the Requests for Production (the
3 "Requests") set forth substantially in the form attached hereto as **Exhibit 1**, and (b) provide oral
4 testimony (the "Oral Testimony"), on a mutually agreed date no later than **January 30, 2026**
5 (unless the Committee and Ms. Hamlin agree to extend that date) relating to (i) Ms. Hamlin's
6 search for and possession, custody, or control of documents responsive to the Requests; and (ii)
7 the subject matter of the Requests.

8 **I. PRELIMINARY STATEMENT**

9 Ms. Hamlin is the mother-in-law of Timothy J. LeFever and an insider. Prior to the
10 commencement of the Cases, *the Debtors transferred more than \$2.4 million to Ms. Hamlin*,
11 including more than \$1.6 million in the year prior to the commencement of the Cases.

12 As set forth in the recently approved *Third Amended Disclosure Statement in Support of*
13 *Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. 3055], Ms. Hamlin is the
14 subject of the Committee's investigation and has been identified as a litigation target.

15 The facts and circumstances surrounding the prepetition transfers to Ms. Hamlin are the
16 primary focus of the Committee's discovery in this Application.

17 **II. JURISDICTION**

18 This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§
19 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before
20 this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought
21 herein are §§ 1103 and 1109(b) of the Bankruptcy Code, and Rule 2004.

22 **III. RELIEF REQUESTED**

23 The Committee respectfully requests that the Court enter an *ex parte* order authorizing the
24 Committee to issue a subpoena requiring Ms. Hamlin to (a) complete its production, by **January**
25 **9, 2026**, of documents responsive to the Requests set forth substantially in the form attached
26 hereto as **Exhibit 1**, and (b) provide Oral Testimony, on a mutually agreed date no later than
27 **January 30, 2026** (unless the Committee and Ms. Hamlin agree to extend that date) relating to (i)
28

Ms. Hamlin’s search for and possession, custody, or control of documents responsive to the Requests; and (ii) the subject matter of the Requests.

IV. BASIS FOR RELIEF

Local Rule 2004-1 provides as follows: “The Clerk may issue on behalf of the Court, *ex parte* and without notice, orders granting applications for examination of an entity pursuant to Bankruptcy Rule 2004(a).”¹ The Committee brings this Application *ex parte* pursuant to Local Rule 2004-1 seeking an order without need for a hearing. The Committee understands that Ms. Hamlin reserves the right to interpose objections to the underlying document requests after the issuance of the subpoena. However, objections to the underlying document requests are not grounds to oppose or delay the granting of this Application.

Rule 2004(a) provides that “[o]n motion of any party in interest, the court may order the examination of any entity.”² Rule 2004 is primarily used for “revealing the nature and extent of the bankruptcy estate, and for discovering assets, examining transactions, and determining whether wrongdoing has occurred.”³

Pursuant to Rule 2004(b), a party in interest may seek both document and oral discovery related to “acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor’s estate, or to the debtor’s right to a discharge.”⁴ Under Rule 2004(c), the “attendance of an entity for examination and for the production of documents . . . may be compelled as provided in Rule 9016 for the attendance of a witness at a hearing or trial.”⁵ Federal Rule of Bankruptcy Procedure (“Bankruptcy Rule”) 9016

¹ L.B.R. 2004-1(a).

² Fed. R. Civ. P. 2004(a).

³ *In re Kelton*, 389 B.R. 812, 820 (Bankr. S.D. Ga. 2008); *see also In re Lufkin*, 255 B.R. 204, 208 (Bankr. E.D. Tenn. 2000) (purpose of Rule 2004 is to “determine the condition, extent, and location of the debtor’s estate in order to maximize distribution to unsecured creditors”); *In re Bennett Funding Grp., Inc.*, 203 B.R. 24, 28 (Bankr. N.D.N.Y. 1996) (purpose of Rule 2004 is to assist in “revealing the nature and extent of the estate, and to discover assets of the debtor which may have been intentionally or unintentionally concealed”).

⁴ Fed. R. Civ. P. 2004(b).

⁵ Fed. R. Civ. P. 2004(c).

1 makes Rule 45 of the Federal Rules of Civil Procedure (governing subpoenas) applicable in cases
2 under the Bankruptcy Code. Unlike discovery under the Federal Rules of Civil Procedure (the
3 “Civil Rules”), discovery under Rule 2004 can be a “pre-litigation discovery device.”⁶ As such, a
4 Rule 2004 motion need not be tied to specific factual allegations at issue between parties.⁷
5 Moreover, the scope of a Rule 2004 oral examination is broader than that of discovery under the
6 Civil Rules or the Bankruptcy Rules governing adversary proceedings.⁸ In fact, courts have
7 recognized that Rule 2004 examinations may be “broad” and “unfettered,” and can legitimately be
8 in the nature of a “fishing expedition.”⁹

9 Whether to allow the requested discovery rests within the sound discretion of the Court.¹⁰
10 Bankruptcy courts may allow a Rule 2004 examination of “third parties who have had dealings
11 with the debtor,”¹¹ “to allow inquiry into the debtor’s acts, conduct or financial affairs so as to
12 discover the existence or location of assets of the estate,”¹² “unearthing frauds,”¹³ or to assist in
13 recovering assets for the benefit of a debtor’s creditors.¹⁴

14 _____
15 ⁶ *In re Wilson*, 413 B.R. 330, 336 (Bankr. E.D. La. 2009).

16 ⁷ *In re Symington*, 209 B.R. 678, 683 (Bankr. D. Md. 1997) (Bankruptcy Rule 2004 permits “examination of any party without the requirement of a pending adversary proceeding or contested matter”).

17 ⁸ *In re Ecam Publ’ns, Inc.*, 131 B.R. 556, 559 (Bankr. S.D.N.Y. 1991); *see also In re Drexel Burnham Lambert Grp., Inc.*, 123 B.R. 702, 711 (Bankr. S.D.N.Y. 1991) (“[T]he scope of a Rule 2004 examination is very broad. Rule 2004 discovery is broader than discovery under the Federal Rules of Civil Procedure.”).

19 ⁹ *In re Subpoena Duces Tecum & Ad Testificandum Pursuant to Fed. R. Bankr. P. 2004*, 461 B.R. 823, 829 (Bankr. C.D. Cal. 2011) (citation omitted); *see also In re Countrywide Home Loans, Inc.*, 384 B.R. 373, 400 (Bankr. W.D. Pa. 2008); *In re Bennett Funding Grp.*, 203 B.R. at 28 (purpose of Rule 2004 is to assist in “revealing the nature and extent of the estate, and to discover assets of the debtor which may have been intentionally or unintentionally concealed”); *In re Valley Forge Plaza Assocs.*, 109 B.R. 669, 674 (Bankr. E.D. Pa. 1990).

22 ¹⁰ *See, e.g., In re Hammond*, 140 B.R. 197, 200 (S.D. Ohio 1992).

23 ¹¹ *In re Fearn*, 96 B.R. 135, 138 (Bankr. S.D. Ohio 1989); *see also In re W&S Invs., Inc.*, No. 91-35830, 1993 U.S. App. LEXIS 2231, at *5-6 (9th Cir. Jan. 28, 1993) (unpublished disposition) (Rule 2004 is a “broadly construed discovery device which permits any party in interest in a bankruptcy proceeding to move for a court order to examine any entity...,” the “scope of inquiry permitted under a Rule 2004 examination is generally very broad and can ‘legitimately be in the nature of a ‘fishing expedition.’”) (citation omitted).

26 ¹² *In re Dinubilo*, 177 B.R. 932, 940 (E.D. Cal. 1993).

27 ¹³ *Dynamic Fin. Corp. v. Kipperman (In re N. Plaza, LLC)*, 395 B.R. 113, 122 n.9 (S.D. Cal. 2008) (citations omitted).

28 ¹⁴ *See In re Vantage Petroleum Corp.*, 34 B.R. 650, 651 (Bankr. E.D.N.Y. 1983) (allowing discovery under Rule 2004 to help the debtor “discover and recover assets for benefit of creditors of the debtor”).

1 In addition, section 105(a) of the Bankruptcy Code authorizes the Court to “issue any
2 order . . . that is necessary or appropriate to carry out the provisions of this title.”¹⁵ The proposed
3 discovery will, among other things, assist the Committee to fulfill its statutory duty to “investigate
4 the acts, conduct, assets, liabilities, and financial condition of the debtor.”¹⁶ The relief requested in
5 this Application will not reduce or expand the substantive rights of any party to object to or
6 modify the information requested by the Committee.

7 Here, the requested relief is well within the scope of Rule 2004. The Committee seeks to
8 maximize the amount of creditors’ recoveries in this Cases. As such, the Committee needs the
9 information requested from Ms. Hamlin detailing the excessive recovery she made during the
10 Ponzi scheme when other general unsecured creditors did not recover even their principle
11 contributions.

12 **V. NO PRIOR REQUEST**

13 No prior request for the relief sought in this Application has been made to this or any other
14 Court.

15 **VI. NOTICE**

16 Local Rule 2004-1 provides that this Application can be brought “ex parte and without
17 notice.” L.B.R. 2004-1(a). Nevertheless, notice of this Application will be provided to (a) the
18 Office of the United States Trustee – via ECF; (b) counsel to the Debtors – via ECF; and (c) all
19 other ECF recipients.

20 *[Remainder of page left intentionally blank]*
21
22
23
24
25
26

27 ¹⁵ 11 U.S.C. § 105(a).

28 ¹⁶ *Id.* § 1103(c)(2).

1 **VII. CONCLUSION**

2 For the reasons set forth above, the Committee respectfully requests that the Court grant
3 this Application. A proposed order granting this Application is attached hereto as **Exhibit 2**.

4
5 Dated: December 17, 2025

PACHULSKI STANG ZIEHL & JONES LLP

6
7 By /s/ Jason H. Rosell

8 Debra I. Grassgreen

9 John D. Fiero

Jason H. Rosell

10 *Counsel to the Official*

11 *Committee of Unsecured Creditors*
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 1
Requests for Production of Documents

DEFINITIONS

1. “ALL” shall be construed as encompassing “EACH” and “ANY”.
2. “KATHLEEN L. HAMLIN” means Kathleen M. Hamlin, trustee of The Kathleen Hamlin Living Truste Dated July 2, 2008, and her agents, accountants, financial advisors, attorneys, employees, representatives, and/or family members (INCLUDING, but not limited to, Timothy LeFever and Amy LeFever).
3. “ANY” “shall be construed as encompassing “EACH” and “ALL”.
4. “CHAPTER 11 CASES” means the open chapter 11 cases of the DEBTORS in the United States Bankruptcy Court for the Northern District of California.
5. “COMMITTEE” means the Official Committee of Unsecured Creditors appointed in the CHAPTER 11 CASES.
6. “COMMUNICATION” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
7. “CONCERNING” means relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, approving, authorizing, constituting, describing, identifying, referring to, referencing, discussing, indicating, connected with or otherwise pertaining in ANY way, in whole or in part, to the subject matter being referenced.
8. “DEBTORS” means the entities identified on Appendix 1 attached hereto.
9. “DOCUMENT” is synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate DOCUMENT within the meaning of the word DOCUMENT. A DOCUMENT includes written COMMUNICATIONS.
10. “EACH” shall be construed as encompassing “ALL” and “ANY”.
11. “ENTITY” shall have the meaning ascribed to such term in 11 U.S.C. § 101(15).
12. “IDENTIFY”

a. *With respect to PERSONS:* When referring to a PERSON, “to identify” means to give, to the extent known, the PERSON’s full name, present or last known address; and when referring to a natural person, additionally, the present or last known place of employment. Once a PERSON has been identified in accordance with this definition, only the name of that PERSON need be listed in response to subsequent discovery requesting the IDENTIFICATION of that person.

b. *With respect to DOCUMENTS:* When referring to DOCUMENTS, “to identify” means to give, to the extent known, the (i) type of DOCUMENT; (ii) general subject matter; (iii) date of the DOCUMENT; and (iv) author(s), addressee(s) and recipient(s). In the alternative, YOU may produce the DOCUMENTS, together with identifying information sufficient to satisfy Federal Rule of Civil Procedure 33(d).

13. “INCLUDING” means “including, without limitation” and “including, but not limited to”.
14. “KSMP” means Debtor KS Mattson Partners, LP.
15. “LFM DEBTORS” means the Debtors listed in **Attachment 1**.
16. “PERSON” is any natural person, juridical person, or any legal ENTITY, INCLUDING, without limitation, any business, religious, or governmental ENTITY or association
17. “REQUESTS” means the Requests for Production set forth below.
18. “YOU” and “YOUR” means KATHLEEN L. HAMLIN.

INSTRUCTIONS

- A. Unless otherwise specified, the REQUESTS seek DOCUMENTS dated or created on and after **August 6, 2014**.
- B. YOUR responses to the REQUESTS are subject to ALL applicable Federal Rules of Bankruptcy Procedure and this Court’s Local Rules.
- C. Please bates number EACH page of EACH DOCUMENT that YOU produce.
- D. YOU are required to conduct a thorough investigation and produce ALL DOCUMENTS

in YOUR possession, custody, and control.

- E. In the REQUEST, the use of the singular form of ANY word includes the plural and vice versa. The words “and” and “or” shall both be conjunctive and disjunctive.
- F. If YOU are unable to produce DOCUMENTS responsive to ANY REQUEST but DOCUMENTS responsive to the REQUEST exist, provide a written DOCUMENT containing the following information:
 - 1. The date of the DOCUMENT;
 - 2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
 - 3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
 - 4. The name, address, telephone number and work title of EACH recipient of the DOCUMENT;
 - 5. The number of pages in the DOCUMENT;
 - 6. The document control number, if ANY;
 - 7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has/have possession of the DOCUMENT;
 - 8. A specific description of the subject matter of the DOCUMENT;
 - 9. The reason why YOU cannot produce the DOCUMENT.
- G. YOU are under a continuing duty to amend YOUR written responses to the REQUESTS and to produce additional DOCUMENTS if the written responses or document production is incomplete or incorrect in ANY material respect, and if the additional or corrective information has not otherwise been made known to the COMMITTEE.
- H. YOU are required to produce the full and complete originals (in native format, if electronic), or copies if the originals are unavailable, of EACH DOCUMENT responsive to the REQUESTS along with ALL non-identical copies and drafts in their entirety. A copy may be produced in lieu of originals if the entirety (front and back where appropriate) of the DOCUMENT is reproduced and YOU state by declaration under penalty of perjury that the copy provided is a true, correct, complete, and accurate

duplication of the original.

- I. Produced DOCUMENTS must include ALL exhibits, attachments, and ANY other DOCUMENTS otherwise appended to another DOCUMENT.
- J. For ELECTRONICALLY STORED INFORMATION (“ESI”):
 - 1. Produce DOCUMENTS in accordance with the instructions at <https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data>
 - 2. Produce ESI in its native format.
 - 3. Maintain family integrity.
 - 4. Perform custodian-level de-duplication.
 - 5. Produce a DAT load file with the following metadata fields: Beginning Production Number, Ending Production Number, Beginning Attachment Number, End Attachment Number, Family ID, Page Count, Custodian, Original Location Path, Email Folder Path, Document Type, Doc Author, Doc Last Author, Comments, Categories, Revisions, File Name, File Size, MD5 Hash, Date Last Modified, Time Last Modified, Date Created, Time Created, Date Last Accessed, Time Last Accessed, Date Sent, Time Sent, Date Received, Time Received, To, From, CC, BCC, Email Subject, Path to Native, Path to Full Text, Original Time Zone.
 - 6. Process ESI in Pacific Time Zone and provide a metadata field indicating original time zone.
- K. If YOU withhold or redact a portion of ANY DOCUMENT under a claim of privilege or other protection, then the DOCUMENT must be identified on a privilege log, which shall be produced contemporaneously with the non-privileged DOCUMENTS responsive to this REQUEST, and which privilege log shall state the following information:

[remainder of page left intentionally blank]

1. The date of the DOCUMENT;
2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
4. The name, address, telephone number and work title of EACH recipient of the DOCUMENT;
5. The number of pages in the DOCUMENT;
6. The document control number, if ANY;
7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has/have possession, custody, or control of the DOCUMENT;
8. A general description of the subject matter of the DOCUMENT or the portion redacted without disclosing the asserted privileged or protected COMMUNICATION;
9. The specific privilege(s) or protection(s) that YOU contend applies.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

DOCUMENTS sufficient to IDENTIFY YOUR connection, financial or otherwise, in ALL of the following: (a) in Capitol Resource Institute, (b) The Laurel Wreath Foundation, Inc.; (c) Monley Hamlin Construction; and (d) Monley Hamlin, Inc.

REQUEST FOR PRODUCTION NO. 2:

ALL DOCUMENTS CONCERNING the DEBTORS INCLUDING, but not limited to, ALL transfers of ANY item of value between YOU and ANY of the DEBTORS. This REQUEST includes, but is not limited to, DOCUMENTS CONCERNING the payments to and from YOU CONCERNING YOUR investments in LeFever Mattson, a California corporation; Autumn Wood I, LP; Country Oaks I, LP; Tradewinds Apartments, LP; and Hagar Properties LP.

REQUEST FOR PRODUCTION NO.3:

ALL DOCUMENTS, not already provided in these CHAPTER 11 CASES,
CONCERNING YOUR proof of claim number 1745 and YOUR proofs of interest numbers
1401.01, 1401.02, 1401.03, and 1401.04.

REQUEST FOR PRODUCTION NO. 4:

ALL DOCUMENTS CONCERNING the business relationship between Monley Hamlin
Construction or Monley Hamlin, Inc., on the one hand, and Kenneth Mattson, Timothy LeFever,
Amy LeFever (nee Hamlin), and ANY of the DEBTORS, on the other hand.

-end-

Appendix 1 – Debtors

Debtor Name	Petition Date	Tax ID	Case No.
Apan Partners LLC	9/12/2024	N/A	24-10487
Autumn Wood I, LP	9/12/2024	20-0164208	24-10488
Bay Tree, LP	9/12/2024	82-1071378	24-10489
Beach Pine, LP	9/12/2024	83-2643272	24-10490
Bishop Pine, LP	9/12/2024	83-2643038	24-10491
Black Walnut, LP	9/12/2024	47-2451858	24-10492
Buck Avenue Apartments, LP	9/12/2024	54-2090323	24-10493
Buckeye Tree, LP	9/12/2024	88-2980108	24-10494
Bur Oak, LP	9/12/2024	87-4699497	24-10495
Butcher Road Partners, LLC	9/12/2024	45-5159521	24-10496
California Investment Properties, a California corporation	9/12/2024	30-0289474	24-10543
Cambria Pine, LP	9/12/2024	83-2644771	24-10497
Chestnut Oak, LP	9/12/2024	87-4702239	24-10498
Country Oaks I, LP	9/12/2024	26-0860694	24-10499
Divi Divi Tree, L.P.	9/12/2024	71-0926806	24-10500
Douglas Fir Investments, LP	9/12/2024	47-4674444	24-10501
Firetree I, LP	9/12/2024	82-3519393	24-10502
Firetree II, LP	9/12/2024	82-3519554	24-10503
Firetree III, LP	9/12/2024	82-3919655	24-10504
Foxtail Pine, LP	9/12/2024	83-2643197	24-10505
Ginko Tree, LP	9/12/2024	88-2960976	24-10506
Golden Tree, LP	9/12/2024	82-1060045	24-10507
Hagar Properties, LP	9/12/2024	04-3598044	24-10508
Heacock Park Apartments, LP	9/12/2024	46-3737509	24-10509
Home Tax Service of America, Inc., dba LeFever Mattson Property Management	9/12/2024	68-0262554	24-10544
LeFever Mattson I, LLC	9/12/2024	47-4960075	24-10510
LeFever Mattson, a California corporation	9/12/2024	68-0197537	24-10545
Live Oak Investments, LP	9/12/2024	47-3786181	24-10511
Monterey Pine, LP	9/12/2024	83-2644824	24-10512
Napa Elm, LP	9/12/2024	54-2090332	24-10513
Nut Pine, LP	9/12/2024	83-2661795	24-10514
Pinecone, LP	9/12/2024	84-2395880	24-10515
Pinewood Condominiums, LP	10/2/2024	54-2090329	24-10598
Ponderosa Pines, LP	10/2/2024	N/A	24-10599
Red Cedar Tree, LP	9/12/2024	88-3572519	24-10517
Red Mulberry Tree, LP	9/12/2024	88-3572594	24-10518

Debtor Name	Petition Date	Tax ID	Case No.
Red Oak Tree, LP	9/12/2024	92-1008382	24-10520
Red Oak, LP	9/12/2024	61-2022650	24-10519
Red Spruce Tree, LP	9/12/2024	92-0780568	24-10521
Redbud Tree, LP	9/12/2024	88-2961999	24-10516
River Birch, LP	9/12/2024	86-3020630	24-10522
River Tree Partners, LP	9/12/2024	81-3671554	24-10523
River View Shopping Center 1, LLC	9/12/2024	47-4186147	24-10524
River View Shopping Center 2, LLC	9/12/2024	47-4186476	24-10525
RT Capitol Mall, LP	9/12/2024	81-3775896	24-10526
RT Golden Hills, LP	9/12/2024	81-3708073	24-10527
Scotch Pine, LP	9/12/2024	86-3043628	24-10528
Sequoia Investment Properties, LP	9/12/2024	32-0136044	24-10529
Sienna Pointe, LLC	9/12/2024	47-4712579	24-10530
Spruce Pine, LP	9/12/2024	84-2396399	24-10532
Tradewinds Apartments, LP	9/12/2024	54-2090326	24-10533
Vaca Villa Apartments, LP	9/12/2024	54-2090327	24-10534
Valley Oak Investments, LP	9/12/2024	47-3383417	24-10535
Watertree I, LP	9/12/2024	82-3519819	24-10536
Willow Oak, LP	9/12/2024	87-4700495	24-10537
Windscape Apartments I, LP	9/12/2024	26-0860477	24-10538
Windscape Apartments II, LP	9/12/2024	26-0860509	24-10539
Windscape Apartments, LLC	9/6/2024	83-1597353	24-10417
Windscape Holdings, LLC	9/12/2024	83-1608759	24-10540
Windtree, LP	9/12/2024	82-4974654	24-10541
Yellow Poplar, LP	9/12/2024	86-3043392	24-10542

EXHIBIT 2
Proposed Form of Order Granting *Ex Parte* Application

Debra I. Grassgreen (CA Bar No. 169978)
John D. Fiero (CA Bar No. 136557)
Jason H. Rosell (CA Bar No. 269126)
PACHULSKI STANG ZIEHL & JONES LLP
One Sansome Street, Suite 3430
San Francisco, California 94104
Telephone: 415-263-7000
Email: dgrassgreen@pszjlaw.com
jfiero@pszjlaw.com
jrosell@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.*,¹
Debtors.

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

In re
KS MATTSON PARTNERS, LP,²
Debtor.

**ORDER GRANTING THE *EX PARTE*
APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN
ORDER PURSUANT TO BANKRUPTCY
RULE 2004 AUTHORIZING ORAL
EXAMINATION OF AND PRODUCTION
OF DOCUMENTS BY KATHLEEN L.
HAMLIN, TRUSTEE OF THE
KATHLEEN HAMLIN LIVING TRUST
DATED JULY 2, 2008**

Upon consideration of the *EX PARTE APPLICATION OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY*

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned 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.

² The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210. Solana Beach, CA 92075.

1 *RULE 2004 AUTHORIZING ORAL EXAMINATION OF AND PRODUCTION OF DOCUMENTS*
2 *BY KATHLEEN L. HAMLIN, THE TRUSTEE OF THE KATHLEEN HAMLIN LIVING TRUST*
3 *DATED JULY 2, 2008* (the “Application”) [Doc. No.], the record in this case, and for good
4 and sufficient cause appearing,

5 IT IS HEREBY ORDERED AS FOLLOWS:

- 6 1. The Application is GRANTED.
- 7 2. The Official Committee of Unsecured Creditors is authorized to issue a subpoena
8 directed to Kathleen Hamlin, trustee of The Kathleen Hamlin Living Trust Dated July 2, 2008
9 (“Ms. Hamlin”) requiring Ms. Hamlin to (a) complete her production, by **January 9, 2026**, of
10 documents responsive to the Requests for Production (the “Requests”) set forth substantially in the
11 form attached as **Exhibit 1** to the Application; and (b) provide oral testimony on a mutually agreed
12 date no later than **January 30, 2026** (unless the Committee and Ms. Hamlin agree to extend that
13 date) relating to (i) Ms. Hamlin’s search for and possession, custody, or control of documents
14 responsive to the Requests; and (ii) the subject matter of the Requests.

15
16 ****END OF ORDER****
17
18
19
20
21
22
23
24
25
26
27
28