

**KELLER BENVENUTTI KIM LLP**  
 101 MONTGOMERY STREET, SUITE 1950  
 SAN FRANCISCO, CALIFORNIA 94104

**KELLER BENVENUTTI KIM LLP**  
 TOBIAS S. KELLER (Cal. Bar No. 151445)  
 (tkeller@kbbkllp.com)  
 DAVID A. TAYLOR (Cal. Bar No. 247433)  
 (dtaylor@kbbkllp.com)  
 THOMAS B. RUPP (Cal. Bar No. 278041)  
 (trupp@kbbkllp.com)  
 101 Montgomery Street, Suite 1950  
 San Francisco, California 94104  
 Telephone: (415) 496-6723  
 Facsimile: (650) 636-9251

*Attorneys for the Debtors and  
 Debtors in Possession*

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

In re:

LEFEVER MATTSON, a California  
 corporation, *et al.*,<sup>1</sup>  
 Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**CERTIFICATE OF NO OBJECTION  
 REGARDING NOTICE OF SALE OF  
 SUBJECT PROPERTY LOCATED AT  
 453 FLEMING AVENUE EAST,  
 VALLEJO, CA 94591**

In re

KS MATTSON PARTNERS, LP,  
 Debtor.

[Re: Dkt. No. 2916]

**Objection Deadline: December 16, 2025**

<sup>1</sup> 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/IM>

**THE NOTICE OF SALE**

On November 25, 2025, Keller Benvenutti Kim LLP, counsel for the debtors in the above-captioned chapter 11 cases (the “**Debtors**”),<sup>2</sup> filed the below-referenced notice of sale (the “**Notice of Sale**”) and adequate assurance declaration (the “**Buyer’s Declaration**”) pursuant to the *Order Establishing Procedures for Real Property Sales* [Dkt. No. 971] (the “**Sale Procedures Order**”) entered by the Court on March 5, 2025:

- *Notice of Sale of Subject Property Located at 453 Fleming Avenue East Vallejo, CA 94591* [Dkt. No. 2916]
- *Declaration of Venkata Bhanu P. Gollapudi in Support of Adequate Assurance of Future Performance by NB2CA, LLC, a California Limited Liability Company, with Respect to the Assumption and Assignment of Executory Contracts and/or Unexpired Contracts in Connection with the Sale of 453 Fleming Avenue East Vallejo, CA 94591* [Dkt. No. 2917]

The Notice of Sale and the Buyer’s Declaration were served on November 25, 2025. The deadline to file responses or oppositions to the Notice of Sale was December 16, 2025, and no oppositions or responses have been filed with the Court or received by the Debtors. Pursuant to the Sale Procedures Order, if the Objection Deadline passes without the filing of an Objection, the Debtors can file a Certificate of No Objection and upload the proposed order substantially in the form attached to the Notice of Sale as Exhibit 1. Following the entry of an order by the Court, the Debtors are authorized to proceed with the closing of the sale of the Subject Property.

**DECLARATION OF NO RESPONSE RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am an attorney with the firm of Keller Benvenutti Kim LLP, counsel for the Debtors.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Sale Procedures Order or the Notice of Sale. Debtors as used herein excludes KSMP.

2. I certify that I have reviewed the Court's docket in the Debtors' cases and have not received any response or opposition to the Notice of Sale.

Dated: December 17, 2025

**KELLER BENVENUTTI KIM LLP**

By: /s/ Gabrielle L. Albert

Gabrielle L. Albert

*Attorneys for the Debtors and Debtors in Possession*