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 14 *of Unsecured Creditors*

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

18 In re:
 19 LEFEVER MATTSON, a California
 20 corporation, *et al.*,¹
 21 Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

NOTICE OF SUPPLEMENT TO
THIRD AMENDED JOINT PLAN OF
LIQUIDATION

22 In re
 23 KS MATTSON PARTNERS, LP,
 24 Debtor.

26 ¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification
 27 number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la
 28 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 an



1 PLEASE TAKE NOTICE that, on December 11, 2025, the LFM Debtors, KSMP, and
2 the Committee (the “Plan Proponents”) filed the (a) *Third Amended Joint Chapter 11 Plan of*
3 *Liquidation* [Docket No. 3108] (the “Plan”) and (b) *Third Amended Disclosure Statement in*
4 *Support of Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No. 3109] (the
5 “Disclosure Statement”).²

6 PLEASE TAKE FURTHER NOTICE that, on December 11, 2025, the Court entered its
7 Order (I) *Approving the Plan Summary and Approving Disclosure Statement*; (II) *Scheduling*
8 *Status Conference on Confirmation of Plan and Approving the Form and Manner of Service of the*
9 *Confirmation Notice*; (III) *Establishing Procedures for the Solicitation and Tabulation of Votes on*
10 *Plan*; (IV) *Estimating Investor Claims and Interests Solely for Voting Purposes*; and (V)
11 *Approving Related Matters* [Docket No. 3105] (the “Confirmation Procedures Order”). Pursuant
12 to the Confirmation Procedures Order, the deadline for the Plan Proponents to file any supplement
13 to the Plan is December 19, 2025.

14 PLEASE TAKE FURTHER NOTICE that, on December 19, 2025, the Plan Proponents
15 filed the *Supplement to the Third Amended Joint Chapter 11 Plan of Liquidation* [Docket No.
16 3176] (the “Plan Supplement”), which includes the following documents, as may be modified,
17 amended, or supplemented from time to time:

Exhibit	Description
A.	Oversight Committee
B.	Plan Recovery Trustee Curriculum Vitae
C.	Schedule of Assumed Agreements
D.	Schedule of Excluded Parties
E.	Plan Recovery Trust Agreement

18 PLEASE TAKE FURTHER NOTICE that the information contained herein is not final
19 and remains subject to ongoing review by the Plan Proponents and interested parties. The Plan
20 Proponents reserve the right, subject to the terms and conditions set forth in the Plan, to alter,
21 amend, modify, or supplement the Plan Supplement, and any information contained therein, at any
22 time before the effective date of the Plan, or any such other date as may be provided for by the
23 Plan or by order of the Court.

24 PLEASE TAKE FURTHER NOTICE that, the forms of the documents contained in the
25 Plan Supplement are integral to, and are considered part of, the Plan. If the Plan is approved, the
26 documents contained in the Plan Supplement will be approved by the Court pursuant to the order
27 confirming the Plan.

28 PLEASE TAKE FURTHER NOTICE that the Disclosure Statement, Plan, and the Plan
Supplement, as well as further information regarding these Chapter 11 Cases, are available free of
charge on the Debtors’ restructuring website at <https://veritaglobal.net/lm>.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Plan.

1 Dated: December 19, 2025

KELLER BENVENUTTI KIM LLP

2
3 By: /s/ Thomas B. Rupp

4 Tobias S. Keller

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6 Thomas B. Rupp

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