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*Attorneys for the Tillman Opposing
 Investors*¹

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re:
 LEFEVER MATTSON, a California
 corporation, et al.²

Debtors.

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

**MOTION TO DESIGNATE TILLMAN
 OPPOSING INVESTORS AS
 “PERMITTED PART[IES]” UNDER
 CONFIDENTIALITY PROTOCOLS**

¹ The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulos; Kay Poulos; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the “Tillman Opposing Investors”).

² The last four digits of LeFever Mattson’s tax identification number are 7537. 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>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

1 In re:

2 KS MATTSON PARTNERS, LP,

3 Debtor.

Date: January 9, 2026

Time: 11:00 A.M.

Location: 1300 Clay Street, Courtroom 215,
Oakland, CA 94612

Judge: Hon. Charles D. Novack

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6 The Tillman Opposing Investors request an order from this Court designating the

7 Tillman Opposing Investors as “Permitted Part[ies]” under the Court’s (I) *Order Establishing*

8 *Bar Date, Approving Form and Manner of Bar Date Notice and Related Procedures, and*

9 *Approving Confidentiality Protocols* (Doc. No. 459) (the “*LFM Confidentiality Protocols*”) and (II) *Order Establishing Bar Date, Approving Form and Manner of Bar Date Notice and*

10 *Related Procedures, and Approving Confidentiality Protocols* (Doc. No. 2184) (the “*KSMP*

11 *Confidentiality Protocols*,” and collectively with the *LFM Confidentiality Protocols*, the

12 “*Confidentiality Protocols*”).

13

14 I. FACTUAL BACKGROUND

15 A. Prepetition Background

16 The Tillman Opposing Investors invested in numerous Debtors³ for decades leading up

17 to the Petition Filing Date. The Tillman Opposing Investors’ various claims in the Debtors

18 have been fully disclosed on the Proofs of Claims previously submitted as to both the LFM

19 Debtors and KSMP. These disclosed investments represent a significant portion of the Tillman

20 Opposing Investors’ wealth and savings, both retirement and otherwise.

21 B. The Confidentiality Protocols

22 On or about December 13, 2024, the Court entered the LFM Confidentiality Protocols.

23 On or about August 28, 2025, the Court entered the KSMP Confidentiality Protocols. Given

24 the Confidentiality Protocols procedures, the Tillman Opposing Investors have not had access

25 to any of the Proofs of Claims and/or Proofs of Interests filed in these proceedings against any

26 of the Debtors.

27

28 ³ Capitalized terms used herein but not otherwise defined shall have the same meaning as ascribed them in the *Third Amended Joint Chapter 11 Plan of Liquidation* (Doc. No. 3108).

On or about December 11, 2025, the Plan Proponents filed the Plan. The Voting Deadline for the Plan, and the deadline to file an objection to the Plan is January 21, 2026. The Plan proposes two primary mechanisms through which to liquidate and distribute the Debtors' assets: (i) substantive consolidation of all Debtors, which would pool all Debtors' assets into a single pot, and (ii) a Ponzi scheme finding as to all Debtors, which would limit Tranche 1 Investor Claims to the principal amount invested less any distributions received since the Ponzi Start Date.

II. DISCUSSION

The Confidentiality Protocols allow Permitted Parties to access proof of claims for Debtors. The Permitted Parties include “[s]uch other persons as the Court allows after notice and an opportunity for hearing; *provided, however*, that any such determination shall be made on no less than fourteen days’ prior notice to affected Investors.” *KSMP Confidentiality Protocols* ¶ 8. The Tillman Opposing Investors respectfully request the Court enter an order designating the Tillman Opposing Investors as Permitted Parties so that it may review the alleged claims and interests that have been filed in relation to the Debtors.

The Tillman Opposing Investors are being asked to complete a Ballot as to whether to accept or reject the Plan. While information as to the “on-book” investments in the Debtors has been disclosed, the Tillman Opposing Investors have been given little information as to the “off-book” investments that have been filed against Debtors. Without this information, the Tillman Opposing Investors will be unable to adequately assess the impact of the Plan on their investments and/or make an informed decision as to whether to accept or reject the Plan. Further, the Tillman Opposing Investors are contemplating filing an objection to the Plan and utilizing experts in furtherance of such objection. In order to fully inform their experts and adequately test and investigate the Plan Proponents’ findings and conclusions as included in the Plan, the Tillman Opposing Investors require access to the Proofs of Claims and Proofs of Interests filed in these proceedings.

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EXHIBIT A

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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION

In re:

LEFEVER MATTSON, a California
corporation, et al.²

Debtors.

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

**[PROPOSED] ORDER DESIGNATING
TILLMAN OPPOSING INVESTORS AS
“PERMITTED PART[IES]” UNDER
CONFIDENTIALITY PROTOCOLS**

¹ The undersigned represent Ruth Tillman; Robert Dean Rhoads, individually and as Trustee of the Robert Donald Rhoads Living Trust; Dolores Rhoads, individually and as Trustee of the Dolores Irene Rhoads Living Trust; Elaine Lockwood; Sylvia Vreeland; Ward Pitman and Anne Pitman, as Trustees of the Ward and Anne Pitman Trust; Randall Roth, individually and as Trustee of the Randall D. Roth and Diane L. Roth Revocable Living Trust; Gregory Poulos; Kay Poulos; Donald Hicks, individually and as Trustee of the Hicks Living Trust; Kimberlie Hicks, as Trustee of the Hicks Living Trust; Corey Anderson and Ute Anderson, as Trustees of the Corey and Ute Anderson Living Trust; Daniel Wallen and Maria Wallen, as Trustees of the Wallen Family Trust; David Ciappara and Irene Ciappara, as Trustees of the David and Irene Ciappara Living Trust; Vitas Alekna and Dalia Alekna, as Trustees of the Vitas Alekna and Dalia Alekna 2002 Revocable Trust; Nancy Sloan, as Trustee of the Nancy M. Sloan Revocable Trust; Daniel Dowell, individually; and Peter S. Strickland, as Trustee of the Peter S. Strickland Trust (hereinafter referred to, collectively, as the “Tillman Opposing Investors”).

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1 In re:

2 KS MATTSON PARTNERS, LP,
3 Debtor.

Date: January 9, 2026

Time: 11:00 am

Location: 1300 Clay Street, Courtroom 215
Oakland, CA 94612

Judge: Hon. Charles D. Novack

4 /
5
6 The motion of the Tillman Opposing Investors to designate the Tillman Opposing
7 Investors as “Permitted Part[ies]” under the Court’s (I) *Order Establishing Bar Date,*
8 *Approving Form and Manner of Bar Date Notice and Related Procedures, and Approving*
9 *Confidentiality Protocols* (Doc. No. 459) (the “*LFM Confidentiality Protocols*”) and (II) *Order*
10 *Establishing Bar Date, Approving Form and Manner of Bar Date Notice and Related*
11 *Procedures, and Approving Confidentiality Protocols* (Doc. No. 2184) (the “*KSMP*
12 *Confidentiality Protocols,*” and collectively with the *LFM Confidentiality Protocols,* the
13 “*Confidentiality Protocols*”), having been filed, the Court having held a hearing, and good
14 cause appearing:

15 It is hereby ORDERED that:

16 1. The Tillman Opposing Investors are designated as “Permitted Part[ies]” under the
17 *Confidentiality Protocols*; and

18 2. The claims administrator shall turn over all Proofs of Claim and Proofs of Interest filed
19 against the Debtors to the undersigned counsel for the Tillman Opposing Investors within
20 fourteen (14) days of entry of this order.

21 **END OF ORDER**

PROOF OF EMAIL SERVICE

24-10545 (CN)

I declare that:

I am and was at the time of service of the papers herein, over the age of eighteen (18) years and am not a party to the action. I am employed in the County of Sonoma, California, and my business address is 100 E Street, Ste 219, Santa Rosa, California 95404.

On December 24, 2024, I served the following documents, described as set forth below on the interested parties in this action, addressed as follows:

MOTION TO DESIGNATE TILLMAN OPPOSING INVESTORS AS “PERMITTED PART[IES]” UNDER CONFIDENTIALITY PROTOCOLS

NOTICE OF HEARING ON MOTION TO DESIGNATE TILLMAN OPPOSING INVESTORS AS “PERMITTED PART[IES]” UNDER THE CONFIDENTIALITY PROTOCOLS

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Kevin C Young kevincyoungesq@aol.com

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

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 24, 2025, at Santa Rosa, California.

/s/ Michael Fallon
Michael Fallon

PROOF OF MAIL SERVICE

24-10545 (CN)

I declare that:

I am and was at the time of service of the papers herein, over the age of eighteen (18) years and am not a party to the action. I am employed in the County of Sonoma, California, and my business address is 438 1st Street, 4th Floor, Santa Rosa, California 95401.

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NOTICE OF HEARING ON MOTION TO DESIGNATE TILLMAN OPPOSING INVESTORS AS “PERMITTED PART[IES]” UNDER THE CONFIDENTIALITY PROTOCOLS

Ally Bank Lease Trust - Assignor to Vehicle Asset Universal Leasing Trust (a.k.a. "VAULT TRUST", or "V.A.U.L. Trust", or "VAULT", or "V.A.U.L.T."), c/o AIS Port	Ally Bank, c/o AIS Portfolio Services, LLC 4515 N Santa Fe Ave. Dept. APS Oklahoma City, OK 73118 4515 N Santa Fe Ave. Dept. APS
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4515 N Santa Fe Ave. Dept. APS Oklahoma City, OK 73118	Oklahoma City, OK 73118
BUCHALTER, A Professional Corporation 500 Capitol Mall, Suite 1900 Sacramento, CA 95814	Mark Baker 1520 E Covell, Ste 5-467 Davis, CA 95616
Ashley Beane Litigation & Asset Resolution Legal Division 8200 Jones Branch Dr. McLean, VA 22102	CBRE, Inc. 415 Mission St., 46th Fl San Francisco, CA 94105
Compass 135 West Napa Street, Ste 200 Sonoma, CA 95476	Compass California II, Inc. 135 W. Napa St., Ste 200 Sonoma, CA 95476
Donald S. Davidson 2950 Buskirk Ave., Ste 300 Walnut Creek, CA 94597	Debra Dellacort-Williams 5 Burgundy Way Yountville, CA 94599
Douglas Elliman 853 Camino Del Mar, Ste 100 Del Mar, CA 92014	George G. Gotthardt FTI Consulting Realty, Inc. 350 S. Grand Ave., Ste. #3000 San Francisco, CA 94111
Kidder Matthews 5 Park Plaza #1700 Irvine, CA 92614	Kurtzman Carson Consultants, LLC dba Verita Global 222 N. Pacific Coast Highway Suite 300 El Segundo, CA 90245
Marcus & Millichap 2626 Hanover Street Palo Alto, CA 94304	NRT West, Inc., dba Coldwell Banker Realty 2277 Fair Oaks Blvd., Ste 440 Sacramento, CA 95825
Premier Estates 138 Pacific Coast Hwy Hermosa Beach, CA 90254	Terre Price 81 De La Guerra Rd San Rafael, CA 94903
PwC US Business Advisory LLP 300 Madison Ave. New York, NY 10017	SSL Law Firm LLP 505 Montgomery St., Ste 620 San Francisco, CA 94111
Bradley D. Sharp President & CEO DSI Consulting 333 South Grand Avenue, Ste 4100 Los Angeles, CA 90071	Caroline Sischo Sheppard, Mullin, Richter and Hampton 350 South Grand Avenue, 40th Floor Los Angeles, CA 90071
Slote, Links & Boreman, PC 50 California St, 34 Floor San Francisco, CA 94111	Sotheby's International Realty 428 First Street East Sonoma, CA 95476
The Lake Tahoe Brokerage Company P.O. Box 3757	Tri Counties Bank Mark H. Atkins

Truckee, CA 96160	Tri Counties Bank Attn: Legal Department Post Office Box 992570 Redding, CA 96099-2570
W Real Estate – Sonoma 539 Broadway Suite B Sonoma, CA 95476	

☒ **BY FIRST-CLASS MAIL:** I caused such envelopes to be deposited in the United States mail, at Santa Rosa, California, with postage thereon fully prepaid, individually, addressed to the parties as indicated. I am readily familiar with the firm's practice of collection and processing correspondence in mailing. It is deposited with the United States postal service each day and that practice was followed in the ordinary course of business for the service herein attested to.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 24, 2025, at Santa Rosa, California.



Hope Dombrowski