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*Attorneys for the Tillman Opposing
 Investors¹*

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

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



In re:

KS MATTSON PARTNERS, LP,
Debtor.

Date: January 9, 2026

Time: 11:00 A.M.

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

Judge: Hon. Charles D. Novack

TO ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE THAT on January 9, 2026 at 11:00 A.M. in Courtroom 215 of the United States Bankruptcy Court for the Northern District of California, located at 1300 Clay Street, Courtroom 215, Oakland, CA 94612, the Tillman Opposing Investors will, and do, move for an order from this Court designating the Tillman Opposing Investors as “Permitted Part[ies]” pursuant to the Court’s (I) *Order Establishing Bar Date, Approving Form and Manner of Bar Date Notice and Related Procedures, and 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 Related Procedures, and Approving Confidentiality Protocols* (Doc. No. 2184) (the “*KSMP Confidentiality Protocols*,” and collectively with the *LFM Confidentiality Protocols*, the “*Confidentiality Protocols*”), subject to Court approval after notice and an opportunity of no less than fourteen (14) days to be given to all Affected Investors (as defined in the *Confidentiality Protocols*) as it relates to Proofs of Claims and Proofs of Interests submitted against the Debtors. This Motion is made pursuant to the *Confidentiality Protocols*, which require fourteen (14) days’ notice.

Any objection to this Motion can be raised at the January 9, 2026 hearing.

The Motion will be based upon this Notice, the Motion, and all pleadings and papers filed in these proceedings, and on such arguments or evidence as may be presented to the Court at the hearing on the Motion.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully, and you may want to discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE BE FURTHER INFORMED that all matters before Judge Novack are

conducted in the courtroom, unless otherwise ordered by the Court. Litigants, counsel, and interested parties may appear at the hearing either in person or by Zoom video or telephone. In the event you fail to appear, the Court may grant the requested relief by default.

All interested parties may consult the Bankruptcy Court's website at www.canb.uscourts.gov for information regarding court operations and procedures. Parties or counsel who have not filed papers but wish to attend the hearing may check the last page of Judge Novack's calendar for the Zoom webinar information. If you have any questions about appearing at a court hearing, you may contact the Bankruptcy Court by calling 888-821-7606.

PERRY, JOHNSON, ANDERSON, MILLER
& MOSKOWITZ, LLP

DATED: December 23, 2025

By: /s/ Isaac M. Gradman

ISAAC M. GRADMAN
MICHAEL E. TRACHT
ALEXANDER A. WIEGEL

AND

MICHAEL C. FALLON
MICHAEL C. FALLON, JR.

Attorneys for Tillman Opposing Investors

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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☒ **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.

On December 24, 2025, I served the following documents, described as set forth below on the interested parties in this action, addressed as follows:

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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