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 KS Mattson Partners, LP*

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

In re:

LEFEVER MATTSON, a California
 corporation, *et al.*,¹

Debtors.

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

Chapter 11

NOTICE OF HEARING ON:

**(A) AMENDED JOINT MOTION OF
 DEBTORS AND OFFICIAL COMMITTEE
 OF UNSECURED CREDITORS FOR AN**

¹ 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://veritaglot>

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ORDER (I) APPROVING THE PLAN SUMMARY AND DISCLOSURE STATEMENT; (II) SCHEDULING HEARING ON CONFIRMATION OF PLAN AND APPROVING THE FORM AND MANNER OF SERVICE OF THE HEARING NOTICE; (III) ESTABLISHING PROCEDURES FOR THE SOLICITATION AND TABULATION OF VOTES ON PLAN; (IV) THE ESTIMATION OF INVESTOR CLAIMS AND INTERESTS SOLELY FOR VOTING PURPOSES; AND (V) APPROVING RELATED MATTERS

--AND--

(B) JOINT MOTION FOR THE ENTRY OF AN ORDER APPROVING SETTLEMENT PROCEDURES WITH RESPECT TO INVESTOR CLAIMS

In re

KS MATTSON PARTNERS, LP,

Debtor.

Date: November 19, 2025
Time: 1:00 p.m. (Pacific Time)
Place: (In Person or Via Zoom)
United States Bankruptcy Court
1300 Clay Street, Courtroom 215
Oakland, CA 94612
Judge: Honorable Charles Novack
Objection Deadline: November 12, 2025

TO THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL CREDITORS AND OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that on August 6, September 12, and October 2, 2024, LeFever Mattson, a California corporation ("LeFever Mattson"), and 59 affiliated entities (together with LeFever Mattson, the "LFM Debtors")² each filed a voluntary petition for relief under chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of California (Santa Rosa Division) (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that on November 22, 2024, KS Mattson Partners, LP ("KSMP" and, together with the LFM Debtors, the "Debtors") became subject to an involuntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2024, the Court entered the *Stipulated Order for Relief in an Involuntary Case* [KSMP Docket No. 131].

² Another affiliated entity, Live Oak Investments, LP ("Live Oak"), filed a chapter 11 petition on September 12, 2024. Live Oak is not a Plan Proponent, and the above-captioned counsel does not represent Live Oak; however, the Plan provides for the substantive consolidation of Live Oak with the other Debtors and its creditors and investors will be entitled to vote on the Plan.

1 The above-captioned chapter 11 cases of the Debtors (the “Chapter 11 Cases”) are being jointly
2 administered for procedural purposes only.

3 **PLEASE TAKE FURTHER NOTICE** that the United States Trustee appointed an
4 official committee of unsecured creditors (the “Committee,” and together with the Debtors, the
5 “Plan Proponents”) in the Chapter 11 Cases on October 9, 2024 [Docket No. 135], amended its
6 appointment on November 25, 2024 [Docket No. 368], and further amended its appointment on
7 August 2, 2025 [Docket No. 2104].

8 **PLEASE TAKE FURTHER NOTICE** that on October 15, 2025, the Plan Proponents
9 filed the *First Amended Joint Chapter 11 Plan of Liquidation* [Docket No. 2561] (the “Plan”); the
10 *Amended Disclosure Statement in Support of First Amended Joint Chapter 11 Plan of Liquidation*
11 [Docket No. 2567] (the “Disclosure Statement”); and the *Notice of Filing Joint Investigation*
12 *Report and Summary of Global Settlement* [Docket No. 2568] (the “Investigation Report,” and,
13 together with the Plan and Disclosure Statement, as such documents may be further amended,
14 modified, or supplemented, including all supplements, exhibits, and schedules thereto, the “Plan
15 Documents”).

16 **PLEASE TAKE FURTHER NOTICE** that on October 15, 2025, the Plan Proponents
17 filed the *Amended Joint Motion of Debtors and Official Committee of Unsecure Creditors for an*
18 *Order (I) Approving the Plan Summary and Disclosure Statement; (II) Scheduling Hearing on*
19 *Confirmation of Plan and Approving the Form and Manner of Service of the Hearing Notice;*
20 *(III) Establishing Procedures for the Solicitation and Tabulation of Votes on Plan; (IV) The*
21 *Estimation of Investor Claims and Interests Soley for Voting Purposes; and (V) Approving Related*
22 *Matters* [Docket No. 2569] (the “Solicitation Procedures Motion”).³ Through the Solicitation
23 Procedures Motion, the Plan Proponents respectfully request the entry of an order that, among
24 other things, (i) approves the Plan Summary; (ii) approves the Disclosure Statement to permit the
25 Plan Proponents to distribute and solicit acceptances for the Plan, (iii) sets the date and time for
26 the Confirmation Hearing and approves certain related deadlines and the form of Confirmation
27 Hearing Notice, (iv) approves the Solicitation Procedures, (v) approves the Investor
28 Claims/Interests Estimation Procedures (for purposes of voting to accept or reject the Plan), and
(vi) grants related relief.

PLEASE TAKE FURTHER NOTICE that on September 17, 2025, the Plan Proponents
filed the *Joint Motion for the Entry of an Order Approving Settlement Procedures with Respect to*
Investor Claims [Docket No. 2365] (the “Investor Claims Settlement Motion”).⁴ Through the
Investor Claims Settlement Motion, the Plan Proponents respectfully request the entry of an order
approving settlement procedures with respect to the allowance of Investor Claims under the Plan.

PLEASE TAKE FURTHER NOTICE that a hearing on the Solicitation Procedures
Motion and the Investor Claims Settlement Motion has been set for **November 19, 2025 at**
1:00 p.m. (Pacific Time), before the Honorable Charles Novack, United States Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that the pursuant to Local Bankruptcy Rules
3017-1(a) and 9014-1(c) any objections to the Investor Claims Settlement Motion or the
Solicitation Procedures Motion, including any objections to the Disclosure Statement or the
Solicitation Procedures, must be filed with the Bankruptcy Court and served on counsel for the
Plan Proponents at the above-captioned addresses by **November 12, 2025**.

PLEASE TAKE FURTHER NOTICE that counsel, parties, and other interested parties
may attend in person in Courtroom 215 in Oakland, by Zoom video, or by Zoom telephone.

³ Capitalized terms used but not defined in this paragraph shall have the meanings provided to them in the
Solicitation Procedures Motion.

⁴ Capitalized terms used but not defined in this paragraph shall have the meanings provided to them in the Investor
Claims Settlement Motion.

1 Additional information is available on Judge Novack's Procedures page on the Bankruptcy Court's
2 website, and information on how to attend the hearing by Zoom will be included with each calendar
3 posted under Judge Novack's Calendar on the Bankruptcy Court's website. If you have questions
4 about how to participate in a video or telephonic hearing, you may contact the court by calling
5 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website at
6 www.canb.uscourts.gov.

7 **PLEASE TAKE FURTHER NOTICE** that copies of the Solicitation Procedures Motion,
8 the Plan Documents, the Investor Claims Settlement Motion, and their supporting documents can
9 be obtained at no cost by contacting counsel for the Committee at LMCommittee@pszjlaw.com
10 or by visiting <https://www.veritaglobal.net/LM>.

11 Dated: October 15, 2025

KELLER BENVENUTTI KIM LLP

12 By: /s/ Thomas B. Rupp

13 Tobias S. Keller

14 David A. Taylor

15 Thomas B. Rupp

16 *Counsel to the LFM Debtors (other than Live*
17 *Oak Investments, LP)*

18 **PACHULSKI STANG ZIEHL & JONES LLP**

19 By: /s/ Jason H. Rosell

20 Debra Grassgreen

21 John D. Fiero

22 Jason H. Rosell

23 Steven W. Golden

24 *Counsel to the Committee*

25 **HOGAN LOVELLS US LLP**

26 By: /s/ Edward J. McNeilly

27 Richard L. Wynne

28 Erin N. Brady

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