

Debra I. Grassgreen (CA Bar No. 169978)
 John D. Fiero (CA Bar No. 136557)
 Jason H. Rosell (CA Bar No. 269126)
 Steven W. Golden (admitted *pro hac vice*)
 PACHULSKI STANG ZIEHL & JONES LLP
 One Sansome Street, Suite 3430
 San Francisco, California 94104-4436
 Tel: 415-263-7000; Fax: 415-263-7010
 Email: dgrassgreen@pszjlaw.com
 jfiero@pszjlaw.com
 jrosell@pszjlaw.com
 sgolden@pszjlaw.com

*Counsel to the Official Committee
 of Unsecured Creditors*

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

In re:
 LEFEVER MATTSON, a California
 corporation, *et al.*,¹
 Debtors.

Case No.: 24-10545 (CN)
 (Jointly Administered)
 Chapter 11
 Case No.: 24-10715 (CN)

In re
 KS MATTSON PARTNERS, LP,
 Debtor.

**DECLARATION OF STEVEN W. GOLDEN
 IN SUPPORT OF THE MOTION OF THE
 OFFICIAL COMMITTEE OF UNSECURED
 CREDITORS FOR SUBSTANTIVE
 CONSOLIDATION OF DEBTOR LEFEVER
 MATTSON AND KS MATTSON
 PARTNERS, LP AND FOR RELATED
 RELIEF**

Hearing

Date: July 18, 2025 at 11:00 a.m.
 Place: United States Bankruptcy Court
 1300 Clay Street, Courtroom 215
 Oakland, CA 94612
 Judge: Hon. Charles Novack

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in the above-captioned 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 I, Steven W. Golden, declare as follows:

2 1. I am a partner with Pachulski Stang Ziehl & Jones LLP, counsel to the Official
3 Committee of Unsecured Creditors of LeFever Mattson, a California corporation, and its affiliated
4 debtors and debtors in possession in the above-referenced case number 24-10545 (CN).

5 2. I submit this declaration (the "Declaration") pursuant to 28 U.S.C. § 1746 in support
6 of the *Motion of the Official Committee of Unsecured Creditors for Substantive Consolidation of*
7 *Debtor Lefever Mattson and KS Mattson Partners, LP and for Related Relief* (the "Motion"), filed
8 concurrently with this Declaration.

9 3. I have personal knowledge of the facts set forth in this Declaration. If called as a
10 witness, I could and would competently testify to the matters stated in this Declaration.

11 4. Attached as Exhibit B to the Motion is a true and correct copy of the Complaint, *SEC*
12 *v. Mattson*, No. 3:25-cv-04387 (N.D. Cali. May 22, 2025), ECF No. 1.

13 5. Attached as Exhibit C to the Motion is a true and correct copy of Proof of Claim No.
14 1427 filed in Case No. 24-10545.

15 6. Attached as Exhibit D to the Motion is a true and correct copy of the Limited
16 Partnership Agreement of KS Mattson Partners, LP.

17 7. Attached as Exhibit E to the Motion are selected pages of a LeFever Mattson letter to
18 Ken Mattson, bates numbered LM_01989454 to LM_01989455.

19 8. Attached as Exhibit F to the Motion are selected pages of the Sharis Apartments Co-
20 Tenancy Agreement, bates numbered LM_01962879 to LM_01962901.

21 9. Attached as Exhibit G are selected pages of the Apartment Property Management
22 Agreement, bates numbered LM_01467167 to LM_01467171.

23 10. Attached as Exhibit H to the Motion is a list of properties transferred from KSMP to
24 an LFM Debtor that was compiled using LFM's books and records and public property searches that
25 were commissioned by the Committee.

26 11. Attached as Exhibit I to the Motion is a list of LFM Debtor properties encumbered by
27 a loan where KSMP is the obligor. This list was compiled using LFM's books and records and
28 public property searches that were commissioned by the Committee.

12. Attached as Exhibit J to the Motion is a true and correct copy of the Final ALTA Settlement Statement - Borrower, bates numbered LFM-S01048167.

13. Attached as Exhibit K to the Motion is a true and correct copy of the Buyer's Final Settlement Statement, bates numbered LFM-S00246754.

14. Attached as Exhibit L to the Motion is a true and correct copy of the Indictment, *United States v. Mattson*, No. CR25-00126 CRB (N.D. Cali. May 13, 2025).

15. Attached as Exhibit M to the Motion is a true and correct copy of the Amended and Restated Bylaws of LeFever Mattson, bates numbered LFM-S_00841634 to LFM-S_00841665.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of June, 2025, at Wilmington, Delaware.

Steven W. Golden