

Richard L. Wynne (Bar No. 120349)  
richard.wynne@hoganlovells.com  
Erin N. Brady (Bar No. 215038)  
erin.brady@hoganlovells.com  
Edward J. McNeilly (Bar No. 314588)  
edward.mcneilly@hoganlovells.com  
HOGAN LOVELLS US LLP  
1999 Avenue of the Stars, Suite 1400  
Los Angeles, California 90067  
Telephone: (310) 785-4600  
Facsimile: (310) 785-4601

*Proposed Attorneys for Debtor and Debtor in Possession*

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

In re

Case No. 24-10715 (CN)

Chapter 11

KS MATTSON PARTNERS, LP,  
Debtor<sup>1</sup>.

**SUPPLEMENTAL DECLARATION OF ROBBIN L. ITKIN IN SUPPORT OF DEBTOR'S MOTION FOR ORDER AUTHORIZING DESIGNATION OF ROBBIN L. ITKIN AS RESPONSIBLE INDIVIDUAL PURSUANT TO B.L.R. 4002-1**

Date: June 24, 2025

Time: 11:00 a.m.

Place: (In Person or Via Zoom)

United States Bankruptcy Court  
1300 Clay Street, Courtroom 215  
Oakland, CA 94612

I, Robbin L. Itkin, declare as follows:

1. I have been appointed as the Responsible Individual of KS Mattson Partners, LP

<sup>1</sup> The last four digits of the Debtor's tax identification number are 5060. The Debtor's mailing address is c/o Stapleton Group, 514 Via de la Valle, Suite 210, Solana Beach, CA 92075.



1 (the “Debtor”) on an interim basis pursuant to the *Interim Order Authorizing Designation of Robbin*  
2 *Itkin as Responsible Individual Pursuant to B.L.R. 4002-1* [Docket No. 145].

3 2. I submit this Declaration as a supplement to my declaration dated June 9, 2024  
4 [Docket No. 134] in support of *Debtor’s Motion Authorizing Designation of Robbin Itkin as*  
5 *Responsible Individual Pursuant to B.L.R. 4002-1* [Docket No. 133].

6 3. Although I am seeking to be retained pursuant to section 363 of the Bankruptcy  
7 Code, and understand that I am not subject to the “disinterested person” requirements of section  
8 327(a), nonetheless, out of an abundance of caution, I make the following disclosures concerning  
9 matters I do not believe create conflicts for me in this case.

10 4. I learned when the creditor matrix was being assembled that Jeffer Mangels Butler  
11 & Mitchell LLP (“JMBM”) represents creditors Umpqua Bank, Duggan’s Mission Chapel and  
12 Amanda Henry, as Trustee of the Frank Bragg Revocable Trust (the “JMBM Creditors”) in this  
13 chapter 11 case.

14 5. My husband, Barry Freeman, is a retired partner of JMBM in Los Angeles, having  
15 retired at the end of December 2023, although he retains a business and economic relationship with  
16 the firm regarding occasional joint clients he refers to the firm on matters unrelated to the Debtor’s  
17 case.

18 6. My husband, while employed at JMBM, did not represent any of the JMBM  
19 Creditors, nor does he now.

20 7. My proposed financial advisors in this case, the Stapleton Group, routinely open  
21 debtor-in-possession accounts at City National Bank (“City National”) for the cases they are  
22 involved in to provide property management or rent collection services. They introduced me to  
23 their contact at City National, a Ms. Laila Brown, who is assisting me in opening a debtor-in-  
24 possession bank account for the Debtor (the “DIP Account”) at City National. I have no prior  
25

1 relationship with Ms. Brown, and I do not believe City National is a creditor of the Debtor.

2 8. While at JMBM, my husband represented City National on certain matters unrelated  
3 to the Debtor. Likewise, my husband's son, a partner at Katten Muchin, currently represents City  
4 National on matters unrelated to the Debtor.

5  
6 9. My husband and I bank personally at City National, all with respect to matters  
7 unrelated to the Debtor.

8 I declare under penalty of perjury of the laws of the United States of America that the  
9 foregoing is true and correct.

10 Executed on June 23, 2025

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12 

13  
14 Robbin L. Itkin