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Attorneys for Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

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

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

In re
KS MATTSON PARTNERS, LP,
Debtor.

**DECLARATION OF PETER BEAUCHAMP IN
SUPPORT OF APPLICATION OF DEBTOR FOR
ORDER AUTHORIZING EMPLOYMENT OF
KIDDER MATTHEWS AS REAL ESTATE
BROKER**

[No Hearing Requested]

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://veritaglobal.net/LM>.



1 I, Peter Beauchamp, hereby declare as follows:

2 1. I am a real estate agent with Kidder Matthews. I submit this declaration on behalf of
3 Kidder Matthews (the "Declaration") in support of the application (the "Application")² of the above-
4 captioned debtor (the "Debtor") for an order authorizing the employment and retention of Kidder
5 Matthews as real estate broker under the terms and conditions set forth in the Application. Except as
6 otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, I
7 would testify thereto.
8

9 2. The Debtor has retained Kidder Matthews in these Chapter 11 Cases, subject to approval
10 of this Court, to market and sell the Debtor's real property listed on Exhibit B to the Application (the
11 "Properties").

12 3. I represent a wide variety of clients in the marketing and disposition of commercial
13 assets throughout the western region of the United States. I am an expert strategist and transactional
14 advisor with a deep understanding of capital markets. I am regularly referred assignments by the
15 industry's most respected financial institutions, private equity funds, special servicers, receivers and
16 attorneys to formulate and execute sales marketing plans to optimize value.

17 4. Kidder Matthews' commission will be (i) 2.5% of the final sale price for any property
18 sold for \$8 million or less, and (ii) 2.0% of the sale price for any property sold for more than \$8 million,
19 in both cases payable at the close of escrow.

20 5. Kidder Matthews has assigned agents (the "Assigned Agent") to each Property. Because
21 Kidder Matthews is a large brokerage firm, it is possible that a different Kidder Matthews agent than
22 the Assigned Agent may represent the buyer. In that case, the Assigned Agent and the buyer's agent
23 will evenly split the maximum commission amount. However, the Assigned Agent may not represent
24 both the Debtor and the buyer without prior written consent from the Debtor.

25 6. The general practice of Kidder Matthews, like other real estate brokers who provide
26 similar services, is to be paid on a contingency fee basis. Kidder Matthews thus does not keep detailed
27

28 ² Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Application.

1 time records similar to those prepared by attorneys.

2 7. Kidder Matthews received from the Debtor a schedule of key parties in interest in these
3 Chapter 11 Cases, a copy of which is attached hereto as **Exhibit A**.

4 8. To check and clear potential conflicts of interest in these Chapter 11 Cases, as well as
5 to identify all "connections" (as such term is used in Bankruptcy Rule 2014) to the Debtor, its creditors,
6 other parties in interest, their respective attorneys and accountants, the United States Trustee for the
7 Northern District of California (the "U.S. Trustee"), any person employed in the office of the U.S.
8 Trustee, Kidder Matthews conducted a review of the parties listed on Exhibit A to determine whether
9 it has or had any relationships with any entity represented thereon. A summary of such relationships
10 that Kidder Matthews identified during this process is set forth on **Exhibit B** to this Declaration.

11 9. I have determined that (a) there is no connection, as such term is used in section
12 101(14)(C) of the Bankruptcy Code, as modified by section 1107(b) and Bankruptcy Rule 2014(a),
13 between Kidder Matthews and any party in interest in these Chapter 11 Cases, including the Debtor,
14 its creditors, the U.S. Trustee, any person employed in the office of the U.S. Trustee, or any other party
15 with an actual or potential interest in these Chapter 11 Cases or their respective attorneys or
16 accountants, except as otherwise disclosed on **Exhibit B**; (b) Kidder Matthews is not a creditor, equity
17 security holder, or insider of the Debtor; (c) Kidder Matthews is not, and has not within two years of
18 the Petition Date, been a director, officer, or employee of the Debtor; and (d) Kidder Matthews neither
19 holds nor represents an interest adverse to the Debtor, its estates, or any class of creditors or equity
20 security holders by reason of any direct or indirect relationship to, connection with, or interest in the
21 Debtor, or for any other reason. For the foregoing reasons, Kidder Matthews is a "disinterested person,"
22 as defined in section 101(14) of the Bankruptcy Code.

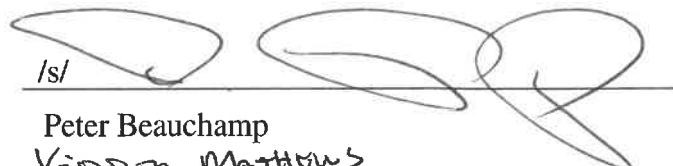
23 10. I will amend or supplement this declaration to the extent I learn that (a) any of the within
24 representations are incorrect or (b) there is any change of circumstances relating thereto.

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

27 Executed on August 12, 2025.
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/s/



Peter Beauchamp
Kieron Matthews
SUP - ~~STAN~~ HILDON

EXHIBIT A

Parties-in-Interest Reviewed for Current and Recent Former Relationships.

1. Debtor

K.S. Mattson Partners, LP

2. Non-Debtor Affiliate/Subsidiary Companies

Perris Freeway Partners, LP
Specialty Property Partners, LP
Treehouse Investments, LP

3. Debtor's Professionals

Hogan Lovells US LLP
Stapleton Group, a part of J.S. Held
Robbin L. Itkin

4. Insiders

Kenneth Mattson
Stacy Mattson
K S Mattson Company, LLC

5. Unsecured Creditors

Sonoma County Tax Collector
San Diego County Treasurer-Tax Collector
Auditor-Controller's Agency Alameda County
State Farm
Citrus Heights - Water
City Of Del Mar - Water
City Of Sonoma - Water
David Wenzel
EDCO
McPhail Fuel Company
Recology
Sonoma Garbage Collectors
Stapleton Group
Vom Water District

6. Secured Creditors

Axos Bank
Bank of America NA

1 Bank of New York, Trustee, on behalf the Alternative Loan Trust 2007
Citadel Environmental Services, Inc.
2 Company, Trustee for Residential Accredited Loans
Dept of Child Support Services
3 Deutsche Bank Trust Company
4 Employment Development Department
Flagstar Bank
5 Hampton Mortgage Group Inc.
JPMorgan Chase Bank, N.A.
6 LAFM Loan Owners, LLC
7 MERS, Nominee for BOFI Federal Bank
ReProp Financial Mortgage Investors, LLC
8 Robert Bass LLC
Socotra
9 Socotra - for HFS Fund IV, LLC
10 Socotra Capital Inc.
Socotra Opportunity Fund, LLC
11 Socotra Opportunity REIT I LLC
Socotra REIT I LLC
12 Sonoma County Tax Collector
13 Sonoma Ranch Homeowners Association
Sylva Family Properties
14 The Mercato Association
Trustee of the John and Mary Metallinos Living Trust
15 Trustee, Gerald and Carol Shiffman Joint Trust
16 WE Alliance Secured Income Fund, LLC

17 **7. Litigation Claims**

18 Brad Driver, by and through the Personal Representative and Administrator of His Estate, Mariah
19 Driver, Plaintiff
Mark Nielsen, Plaintiff
20 Tina M. Stott, as an Individual and Trustee to the Tina M. Stott Family Trust Dated 3/17/2017,
Plaintiff
21 Jeanne Wondra, as Trustee for the James Hurley Trust, et al., Plaintiff
22 Timothy Lefever, Plaintiff
Tamara D. Migliozi, Plaintiff
23 Andrew Tubley, Plaintiff
Benedetti Farms, Inc., Plaintiff
24 Securities & Exchange Commission, Plaintiff

25 **8. Bankruptcy Judges**

26 Chief Judge Stephen L. Johnson
27 Judge Hannah L. Blumenstiel
28 Judge M. Elaine Hammond

1 Judge William Lafferty
2 Judge Dennis Montali
3 Judge Charles Novack

4 **9. Bankruptcy Court Staff**

5 Ruby Bautista
6 Dina Kakalia
7 Ardie Ermac
8 Venice Tamplin-Henderson
9 Teresa Mkhitarian
10 Cindy Fan

11 **10. United States Trustee Staff**

12 Christina Goebelsmann
13 Mike Chow
14 Ianthe V. Del Rosario
15 Nychelle G. Rivera
16 Phillip Shine
17 Yung Nor Wong
18 Jared Day
19 Deanna Hazelton

EXHIBIT B

Parties-in-Interest Noted for Court Disclosure

Relationships in Matters Related to These Proceedings

None.

Relationships in Unrelated Matters - Current

None.

Relationships in Unrelated Matters - Former

I have previously worked with Stapleton Group, a part of J.S. Held to sell real estate assets in a number of transactions unrelated to this Listing Agreement.

