

KELLER BENVENUTTI KIM LLP
101 MONTGOMERY STREET, SUITE 1950
SAN FRANCISCO, CALIFORNIA 94104

KELLER BENVENUTTI KIM LLP
TOBIAS S. KELLER (Cal. Bar No. 151445)
(tkeller@kbkllp.com)
DAVID A. TAYLOR (Cal. Bar No. 247433)
(dtaylor@kbkllp.com)
THOMAS B. RUPP (Cal. Bar No. 278041)
(trupp@kbkllp.com)
101 Montgomery Street, Suite 1950
San Francisco, California 94104
Telephone: (415) 496-6723
Facsimile: (650) 636-9251

*Attorneys for the Debtors and
Debtors in Possession*

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

In re

KS MATTSON PARTNERS, LP,
Debtor.

**DECLARATION OF ROOP PUREWAL
IN SUPPORT OF ADEQUATE
ASSURANCE OF FUTURE
PERFORMANCE BY PUMCO, INC., A
CALIFORNIA CORPORATION, WITH
RESPECT TO THE ASSUMPTION AND
ASSIGNMENT OF EXECUTORY
LEASES AND/OR UNEXPIRED
CONTRACTS IN CONNECTION WITH
THE SALE OF 3217 WALNUT AVENUE,
CARMICHAEL, CA 95608.**

[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/IM>

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1 I, Roop Purewal, declare as follows, pursuant to 28 U.S.C. § 1746:

2 1. I submit this declaration (the “Declaration”) in support of Pumco, Inc., a California
3 corporation (the “Buyer”) with respect to the assumption and assignment of executory leases
4 and/or unexpired contracts (the “Agreements”) in connection with the sale of the real property
5 located at 3217 Walnut Avenue, Carmichael, California 95608 (the “Subject Property”),
6 commonly known as Walnut Crest Apartments, from the above-captioned debtors and debtors-in-
7 possession (collectively, the “Debtors”) pursuant to the Purchase and Sale Agreement dated
8 June 26, 2025 (the “Purchase Agreement”) attached as Exhibit A to Exhibit 1 to the *Notice of Sale*
9 *of 3217 Walnut Avenue, Carmichael, CA 95608* filed concurrently herewith.

10 2. I am knowledgeable and familiar with the Buyer’s business and financial affairs. I
11 am authorized to submit this Declaration on behalf of Buyer. Except as otherwise indicated herein,
12 the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant
13 documents, information provided to me by the Buyer or its advisors, or my opinion based upon
14 experience, knowledge, and information concerning the Buyer’s finances. If called upon to testify,
15 I would testify to the facts set forth in this Declaration.

16 3. I am the Managing Member of the Buyer.

17 4. I am a long-time Sacramento/Davis resident. I have owned, operated, and managed
18 a successful and trusted Sacramento County real estate business for over 15 years. This includes,
19 but is not limited to, owning single family and multifamily rental properties in Sacramento and
20 beyond.

21 5. I have the financial ability, income, and property ownership experience to manage
22 the Subject Property. I am able to pay cash from savings and investments, as evidenced by my
23 Verification of Funds provided with my offer for the Subject Property, and I am qualified and
24 preapproved by multiple lending institutions to obtain a loan. I have ample cash on hand and
25 multiple other cashable and cash flowing assets. My intent is to clean up the Subject Property—
26 grounds, interiors, and systems as needed—rent or lease the units to long-term tenants, and hold
27 the Subject Property as an investment.
28

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1 6. Accordingly, the Buyer has demonstrated the willingness and ability to perform its
2 obligations under the Purchase Agreement and the assigned Agreements.

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

5
6 Dated: 8/18/2025 | 22:23:34 PDT

Signed by:

/s/ 904D35855CE145D...
Roop Purewal, Managing Member,
Pumco, Inc., a California Corporation