

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

Todd M. Schwartz (Bar No. 288895)  
todd.schwartz@hoganlovells.com  
HOGAN LOVELLS US LLP  
855 Main St Suite 200  
Redwood City, CA 94063  
Telephone: (650) 463-4000  
Facsimile: (650) 463-4199

*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.<sup>1</sup>

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

In re  
KS MATTSON PARTNERS, LP,  
Debtor.

**DECLARATION OF SAVANNAH WELLANDER  
IN SUPPORT OF APPLICATION OF DEBTOR  
FOR ORDER AUTHORIZING EMPLOYMENT  
OF W REAL ESTATE AS REAL ESTATE  
BROKER**

[No Hearing Requested]

<sup>1</sup> 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, Savannah Wellander, hereby declare as follows:

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

9 2. The Debtor has retained W Real Estate 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 have been a Sonoma resident for 12 years and have a deep understanding of wine  
13 country real estate. I played a major role in growing and operating a local short term property  
14 management company that was one of the highest grossing companies on the West Coast.

15 4. W Real Estate’s commission will be (i) 1.15% of the final sale price for any property  
16 sold for \$8 million or less, and (ii) 1.0% of the sale price for any property sold for more than \$8 million,  
17 in both cases payable at the close of escrow.

18 5. W Real Estate has assigned agents (the “Assigned Agent”) to each Property. Because  
19 W Real Estate is a large brokerage firm, it is possible that a different W Real Estate agent than the  
20 Assigned Agent may represent the buyer. In that case, the Assigned Agent and the buyer’s agent will  
21 evenly split the maximum commission amount. However, the Assigned Agent may not represent both  
22 the Debtor and the buyer without prior written consent from the Debtor.

23 6. The general practice of W Real Estate, like other real estate brokers who provide similar  
24 services, is to be paid on a contingency fee basis. W Real Estate thus does not keep detailed time  
25 records similar to those prepared by attorneys.

26 7. W Real Estate received from the Debtor a schedule of key parties in interest in these  
27

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

Chapter 11 Cases, a copy of which is attached hereto as Exhibit A.

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

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

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

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

Executed on August 13, 2025.

/s/ Savannah Wellander  
03B43189D69A4E5  
Savannah Wellander

**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

1 Bank of America NA  
2 Bank of New York, Trustee, on behalf the Alternative Loan Trust 2007  
3 Citadel Environmental Services, Inc.  
4 Company, Trustee for Residential Accredited Loans  
5 Dept of Child Support Services  
6 Deutsche Bank Trust Company  
7 Employment Development Department  
8 Flagstar Bank  
9 Hampton Mortgage Group Inc.  
10 JPMorgan Chase Bank, N.A.  
11 LAFM Loan Owners, LLC  
12 MERS, Nominee for BOFI Federal Bank  
13 ReProp Financial Mortgage Investors, LLC  
14 Robert Bass LLC  
15 Socotra  
16 Socotra - for HFS Fund IV, LLC  
17 Socotra Capital Inc.  
18 Socotra Opportunity Fund, LLC  
19 Socotra Opportunity REIT I LLC  
20 Socotra REIT I LLC  
21 Sonoma County Tax Collector  
22 Sonoma Ranch Homeowners Association  
23 Sylva Family Properties  
24 The Mercato Association  
25 Trustee of the John and Mary Metallinos Living Trust  
26 Trustee, Gerald and Carol Shiffman Joint Trust  
27 WE Alliance Secured Income Fund, LLC  
28

## **7. Litigation Claims**

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

## **8. Bankruptcy Judges**

27 Chief Judge Stephen L. Johnson  
28 Judge Hannah L. Blumenstiel

1 Judge M. Elaine Hammond  
Judge William Lafferty  
2 Judge Dennis Montali  
3 Judge Charles Novack

4 **9. Bankruptcy Court Staff**

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

9 **10. United States Trustee Staff**

10 Christina Goebelsmann  
11 Mike Chow  
Ianthé V. Del Rosario  
12 Nychelle G. Rivera  
13 Phillip Shine  
Yung Nor Wong  
14 Jared Day  
Deanna Hazelton  
15

16

17

18

19

20

21

22

23

24

25

26

27

28

**EXHIBIT B**

**Parties-in-Interest Noted for Court Disclosure**

**Relationships in Matters Related to These Proceedings**

I previously held a listing agreement with the Debtor for 230 E Napa St, Sonoma and 1549 E Napa St, Sonoma prior to the bankruptcy filing. The property did not sell, and no compensation was earned. I do not hold any financial interest in the Debtor's estate and do not represent any adverse interest.

I have had a casual friendship with Aubree Mattson, an in-law of Ken Mattson.

**Relationships in Unrelated Matters - Current**

None.

**Relationships in Unrelated Matters - Former**

I previously held a listing agreement with Hannah Mattson, Ken Mattson's daughter in 2024. The property address was 476 W Spain St., Sonoma. The property did not sell and I helped her to place a tenant there long term. I do not manage the rental or tenant.

Additionally, I represented the buyer in the sale of 368 5<sup>th</sup> St. W, Sonoma, CA (Zachary Mattson's property) which was listed on the MLS in April 2024.