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1 KELLER BENVENUTTI KIM LLP TOBIAS S. KELLER (Cal. Bar No. 151445) 2 (tkeller@kbkllp.com) DAVID A. TAYLOR (Cal. Bar No. 247433) 3 (dtaylor@kbkllp.com) THOMAS B. RUPP (Cal. Bar No. 278041) 4 (trupp@kbkllp.com) 101 Montgomery Street, Suite 1950 5 San Francisco, California 94104 Telephone: (415) 496-6723 6 Facsimile: (650) 636-9251 7 Attorneys for the Debtors and Debtors in Possession 8

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

DECLARATION OF RODOLFO C. ALCARAZ IN SUPPORT OF ADEQUATE ASSURANCE OF FUTURE PERFORMANCE WITH RESPECT TO THE ASSUMPTION AND ASSIGNMENT OF EXECUTORY LEASES AND/OR UNEXPIRED CONTRACTS IN CONNECTION WITH THE SALE OF 1161-1167 BROADWAY, SONOMA, CA 95476

[No Hearing Requested]

The last four digits of LeFever Mattson's tax identification number are 7537. 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. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

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- I, Rodolfo C. Alcaraz, declare as follows, pursuant to 28 U.S.C. § 1746:
- I submit this declaration (the "Declaration") with respect to the assumption and assignment of executory leases and/or unexpired contracts (the "Agreements") in connection with the sale of the real property located at 1161-1167 Broadway, Sonoma, California 95476 from the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>") pursuant to the Purchase and Sale Agreement, dated June 9, 2025 (the "Purchase Agreement"), attached as Exhibit A to the Notice of Sale of Subject Property Located at 1161-1167 Broadway, Sonoma, CA 95476, filed concurrently herewith.
- 2. Except as otherwise indicated herein, the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me, or my opinion based upon experience, knowledge, and information concerning my finances. If called upon to testify, I would testify to the facts set forth in this Declaration.
 - 3. I am the purchaser of the Subject Property.
- 4. I grew up in Sonoma, California, and have owned and operated an HVAC business here in Sonoma County for 20 years. I am a licensed contractor. In 2017, I finished the construction of my new home in Sonoma County. I have also owned two condominiums for the past 20 years. All properties are free and clear of debt.
- 5. I have sufficient liquid assets available to pay cash for this Subject Property and also to maintain it. I have reviewed the financial information for the Subject Property provided by the Debtors, and I am capable of meeting the financial obligations of the Agreements.
- 6. I am willing and able to perform my obligations under the Purchase Agreement and the assigned Agreements.

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

Dated: 6/18/2025 | 4:12 PM PDT

Rodolf 6 C. Alcaraz

Case: