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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.

In re

KS MATTSON PARTNERS, LP,

Debtor.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

DECLARATION OF JULIA KEISER 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 424 2ND ST. W., SONOMA, CA

[No Hearing Requested]

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.

Case:

I, Julia Keiser, declare as follows, pursuant to 28 U.S.C. § 1746:

- 1. I submit this declaration (the "<u>Declaration</u>") with respect to the assumption and assignment of executory leases and/or unexpired contracts (the "<u>Contracts</u>") in connection with the sale of the real property located at 424 2nd Street West, Sonoma, California 95476 (the "<u>Subject Property</u>") from the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>") pursuant to the California Residential Purchase Agreement and Joint Escrow Instructions, dated June 21, 2025 (the "<u>Purchase Agreement</u>"), attached as <u>Exhibit C</u> to the *Declaration of Bradley D. Sharp in Support of Motion of Debtor for Sale of Certain Real Property Serving as Collateral for Socotra Capital, Inc. Free and Clear of Liens, Claims and Encumbrances and Related Relief*, 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 have experience handling real property vacation rentals and intend to continue renting the Subject Property as a vacation rental with Sonoma Velley Escapes, Inc.
- 5. I have sufficient liquid assets available to pay cash for the Subject Property and also to maintain it.
- 6. I have reviewed the Purchase Agreement and the Contracts related to the Subject Property, and I am willing and able to perform my obligations under the Purchase Agreement and the assigned Contracts, including the financial obligations under the Contracts.

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

Executed on September 5, 2025.

Julia Keiser September 5, 2025

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