

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@kbbkllp.com)
 DAVID A. TAYLOR (Cal. Bar No. 247433)
 (dtaylor@kbbkllp.com)
 DARA L. SILVEIRA (Cal. Bar No. 274923)
 (dsilveira@kbbkllp.com)
 THOMAS B. RUPP (Cal. Bar No. 278041)
 (trupp@kbbkllp.com)
 101 Montgomery Street, Suite 1950
 San Francisco, California 94104
 Telephone: (415) 496-6723
 Facsimile: (650) 636-9251

*Attorneys for the LFM Debtors and
 Debtors in Possession*

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
 KS Mattson Partners, LP*

**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 LEE R.
 BOGDANOFF IN SUPPORT OF
 JOINT MOTION OF LFM DEBTORS
 AND KSMP TO PAY COSTS
 RELATED TO MEDIATION WITH
 SOCOTRA CAPITAL**

In re:

KS MATTSON PARTNERS, LP,

Debtor.

Date: September 19, 2025
Time: 11:00 a.m.
Place: United States Bankruptcy Court
 1300 Clay Street, Courtroom 215
 Oakland, CA 94612

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 95621. 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://veritaglot>

1
2 I, Lee R. Bogdanoff, hereby declare pursuant to 28 U.S.C. § 1746:

3 1. I am an attorney, duly admitted in the State of California. I am presently a full-
4 time mediator/arbitrator. I formerly served as a judge in the Superior Court of the State of
5 California, County of Los Angeles. Before serving as a judicial officer, I spent over 30 years as a
6 nationally recognized legal practitioner in the areas of bankruptcy, reorganization, and
7 business/commercial disputes.

8 2. I have a record of successfully mediating a variety of difficult business,
9 commercial, and estate and trust disputes. I offer years of experience and an in-depth knowledge
10 of fraudulent transfer, preference, valuation and other issues arising in bankruptcy and
11 reorganization cases.

12 3. I submit this declaration in further support of the *Joint Motion of LFM Debtors and*
13 *KSMP to Pay Costs Related to Mediation with Socotra Capital*, filed on September 10, 2025 (the
14 “Motion”).²

15 4. I have been selected by the Mediating Parties to be engaged as a mediator in the
16 above-captioned Chapter 11 Cases.

17 5. In connection with my proposed retention, I was provided a schedule of interested
18 parties, a copy of which is attached hereto as **Exhibit A**. I reviewed the Schedule of Interested
19 Parties and concluded that I do not have any conflicts with any of the entities listed therein.

20 6. To the best of my knowledge and information available, I have no connection with
21 the LFM Debtors, KSMP, or any other party in interest in these Chapter 11 Cases, other than (i)
22 through our personal trust my wife and I have a checking and pass-book savings account at Wells
23 Fargo Bank and (ii) my wife and I have a credit card issued through Chase Bank. We have had
24 both for over twenty years.

25 7. To the best of my knowledge, I do not represent any interest adverse KSMP or the
26 LFM Debtors.

27
28 ² Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.


8. I am not affiliated nor do I have any connection with the Office of the United States Trustee or any of its employees.

9. I have not received any transfer, assignment, or pledge of property of the LFM Debtors' or KSMP's estates.

10. I have not shared or agreed to share with any other person, other than with members of JAMS, any compensation to be paid with respect to these Chapter 11 Cases.

11. I will charge the Debtors' estates for my services in accordance with my daily rate as set forth in **Exhibit B**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed September 10, 2025.

Lee R. Bogdanoff 

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A
(Schedule of Interested Parties)

<u>Party</u>	<u>Relation</u>
Ruby Bautista	Bankruptcy Court Staff
Bailey Bryant	Bankruptcy Court Staff
Dina Kakalia	Bankruptcy Court Staff
Ardie Ermac	Bankruptcy Court Staff
Venice Tamplin-Henderson	Bankruptcy Court Staff
Teresa Mkhitarian	Bankruptcy Court Staff
Cindy Fan	Bankruptcy Court Staff
Chief Judge Stephen L. Johnson	Bankruptcy Judge
Judge Hannah L. Blumenstiel	Bankruptcy Judge
Judge M. Elaine Hammond	Bankruptcy Judge
Judge William Lafferty	Bankruptcy Judge
Judge Dennis Montali	Bankruptcy Judge
Judge Charles Novack	Bankruptcy Judge
PwC (PricewaterhouseCoopers)	Committee Professional
Pachulski, Stang, Ziehl & Jones, LLP	Committee Professional
LeFever Mattson, a California corporation	Debtor
California Investment Properties, a California corporation	Debtor
Home Tax Service of America, Inc. dba LeFever Mattson Property Management	Debtor
Apan Partners, LLC	Debtor
Autumn Wood I, LP	Debtor
Bay Tree, LP	Debtor
Beach Pine, LP	Debtor
Bishop Pine, LP	Debtor
Black Walnut, LP	Debtor
Buck Avenue Apartments, LP	Debtor
Buckeye Tree, LP	Debtor
Bur Oak, LP	Debtor
Butcher Road Partners, LLC	Debtor
Cambria Pine, LP	Debtor
Chestnut Oak, LP	Debtor
Country Oaks I, LP	Debtor
Divi Divi Tree, L.P.	Debtor
Douglas Fir Investments, LP	Debtor
Firetree I, LP	Debtor
Firetree II, LP	Debtor
Firetree III, LP	Debtor
Foxtail Pine, LP	Debtor
Ginko Tree, LP	Debtor
Golden Tree, LP	Debtor
Hagar Properties, LP	Debtor
Heacock Park Apartments, LP	Debtor
LeFever Mattson I, LLC	Debtor
Live Oak Investments, LP	Debtor
Monterey Pine, LP	Debtor
Napa Elm, LP	Debtor
Nut Pine, LP	Debtor
Pinecone, LP	Debtor
Pinewood Condominiums, LP	Debtor

Ponderosa Pines, LP	Debtor
Redbud Tree, LP	Debtor
Red Cedar Tree, LP	Debtor
Red Mulberry Tree, LP	Debtor
Red Oak, LP	Debtor
Red Oak Tree, LP	Debtor
Red Spruce Tree, LP	Debtor
River Birch, LP	Debtor
River Tree Partners, LP	Debtor
River View Shopping Center 1, LLC	Debtor
River View Shopping Center 2, LLC	Debtor
RT Capitol Mall, LP	Debtor
RT Golden Hills, LP	Debtor
Scotch Pine, LP	Debtor
Sequoia Investment Properties, LP	Debtor
Sienna Pointe, LLC	Debtor
Spruce Pine, LP	Debtor
Tradewinds Apartments, LP	Debtor
Vaca Villa Apartments, LP	Debtor
Valley Oak Investments, LP	Debtor
Watertree I, LP	Debtor
Willow Oak, LP	Debtor
Windscape Apartments, LLC	Debtor
Windscape Apartments I, LP	Debtor
Windscape Apartments II, LP	Debtor
Windscape Holdings, LLC	Debtor
Windtree, LP	Debtor
Yellow Poplar, LP	Debtor
Bradley D. Sharp	Debtors' Professional
Buchalter, APC	Debtors' Professional
Burr, Pilger & Mayer, LLP	Debtors' Professional
CBRE, Inc.	Debtors' Professional
Compass	Debtors' Professional
Development Specialists, Inc.	Debtors' Professional
FTI Consulting, Inc.; FTI Consulting Realty, Inc.	Debtors' Professional
Hanson Bridgett LLP	Debtors' Professional
Keller Benvenuti Kim LLP	Debtors' Professional
KKG Inc. dba Coldwell Banker Kappel Gateway Realty	Debtors' Professional
Kurtzman Carson Consultants, LLC dba Verita Global	Debtors' Professional
Marcus & Millichap	Debtors' Professional
NRT West, Inc. (dba Coldwell Banker Realty)	Debtors' Professional
Pivot Management Group (Seth Wellisch)	Debtors' Professional
Scott Smith	Debtors' Professional
Slote, Links & Boreman PC	Debtors' Professional
Sotheby's International Realty/Casabonne	Debtors' Professional
SSL Law Firm LLP	Debtors' Professional
The Lake Tahoe Brokerage Company, Inc.	Debtors' Professional
The Law Office of Donald S. Davidson	Debtors' Professional
The Law Office of Frank M. Buda	Debtors' Professional

Tony Alvarez, CPA	Debtors' Professional
Weintraub Tobin	Debtors' Professional
Lance Miller (Pivot Management Group)	Independent Director
Risihi Jain (Niro LLC)	Independent Director
Tim LeFever	Insider
Ken Mattson	Insider
Scott Smith	Insider
Mark Bennett	Insider
Charlene Hultman, Plaintiff	Litigation Claims
Colette Berge	Litigation Claims
Lana Arons, Plaintiff	Litigation Claims
Patrick Doe	Litigation Claims
<p>Plaintiffs in <i>Claridge et al.</i> litigation (RICHARD ALLEN CLARIDGE, individual and trustee of the Joint Revocable Trust of Richard Allen Claridge Jr. & Capri Lynn Winser; CAPRI LYNN WINSER; individual and trustee of the Joint Revocable Trust of Richard Allen Claridge Jr. & Capri Lynn Winser; TODD MICHERO, an individual; LORI MICHERO, an individual; BROOKE SAMPLE, individual and trustee of the First Amendment to the Brooke Sample Separate Property Trust; SCOTT A. WALKER, individual and trustee of The Walker Family Living Trust; and ELIZABETH L. WALKER, individual and trustee of The Walker Family Living Trust)</p>	
	Litigation Claims
<p>Plaintiffs in <i>Tubley et al.</i> litigation (ANDREW TUBLEY and MAE UMBRIAC, husband and wife; ANDREW TUBLEY and MAE UMBRIAC, as Trustees of the MAE UMBRIAC AND ANDREW DAVID TUBLEY FAMILY TRUST U/A/D APRIL 27, 2015)</p>	
	Litigation Claims
<p>Plaintiffs in <i>Wondra et al.</i> litigation (JEANNE WONDRA, as trustee for the JAMES HURLEY TRUST; JEANNE WONDRA, as trustee for the IRENE B HURLEY SURVIVORS TRUST; PATRICIA HURLEY, as trustee for the DAVID AARON TANNENBAUM AND PATRICIA MARIE HURLEY LIVING TRUST; MARYANNE KELLY, an individual; MARYANNE KELLY, as trustee for the MARYANNE KELLY LIVING TRUST)</p>	
	Litigation Claims
Tamara D. Migliozi, Plaintiff	Litigation Claims
Elizabeth H. Talley, individually and as Trustee of the Michael and Elizabeth Talley 2017 Family Trust, and Michael M. Talley, individually and as Trustee of the Michael and Elizabeth Talley 2017 Family Trust	
Fennemore LLP	Litigation Claims
Stapleton Group, as Part of JS Held	Litigation Claims
Hemming Morse, LLC	Mattson Professional
Harrow Cellars, a California corporation	Mattson Professional
Pineapple Bear, a California corporation	Mattson Professional
1-888-4-Abatement Inc	Non-Debtor Affiliate
Aakar Development, LLC	Non-Debtor Affiliate
Admiral Security, Inc. / AX9	Other Top-20 > \$5,000
Andrew Landgren	Other Top-20 > \$5,000
Aung Burma, LLC	Other Top-20 > \$5,000
Beer and Wine - Singh, LLC	Other Top-20 > \$5,000
Bold, Polisner, Maddow, Nelson & Judson	Other Top-20 > \$5,000
Bor-La Inc.	Other Top-20 > \$5,000

C and F Company, LLC (Peachy Farms)	Other Top-20 > \$5,000
Cal.net	Other Top-20 > \$5,000
Citadel Environmental Services, Inc	Other Top-20 > \$5,000
City of Fresno	Other Top-20 > \$5,000
CivicWell	Other Top-20 > \$5,000
Court Appointed Special Advocates of Contra Costa County	Other Top-20 > \$5,000
Delfino Escamilla Portillo	Other Top-20 > \$5,000
DOB WINE COMPANY LLC	Other Top-20 > \$5,000
DoorDash Essentials, LLC	Other Top-20 > \$5,000
Edward Jones & Co., LP	Other Top-20 > \$5,000
El Artesano	Other Top-20 > \$5,000
Engstrom Properties	Other Top-20 > \$5,000
Eva's Esthetics, Inc.	Other Top-20 > \$5,000
Everk Hospitality Group, Inc.	Other Top-20 > \$5,000
Fairfield Municipal Utilities	Other Top-20 > \$5,000
Fort Washingto Fitness - Thrive Business Development Inc.	Other Top-20 > \$5,000
Fresno County Private Security	Other Top-20 > \$5,000
GN Veterinary Services, Inc.	Other Top-20 > \$5,000
Golden Bear PT Partners, LLC	Other Top-20 > \$5,000
GraniterockCompany	Other Top-20 > \$5,000
Hop Grenade LLC	Other Top-20 > \$5,000
Jennifer M. Tong	Other Top-20 > \$5,000
Jerry Lee	Other Top-20 > \$5,000
Johanna Torres	Other Top-20 > \$5,000
La Kebrada Mexican Restaurant	Other Top-20 > \$5,000
Lockton Companies, LLC	Other Top-20 > \$5,000
McGowan Trustee of the Lorraine Margaret Orlich Trust dated 9/26/03	Other Top-20 > \$5,000
Michael Nisley (Rawlins), DEBRA RAWLINS	Other Top-20 > \$5,000
MMS Strategies, LLC	Other Top-20 > \$5,000
Monley Hamlin Construction	Other Top-20 > \$5,000
NAMI Contra Costa (National Alliance on Mental Illness Contra Costa County)	Other Top-20 > \$5,000
Pacific Gas & Electric	Other Top-20 > \$5,000
Pear Tree Homeowner's Association	Other Top-20 > \$5,000
Porter's House of Draft	Other Top-20 > \$5,000
Quinonez Cleaning Service	Other Top-20 > \$5,000
Real Care Insurance	Other Top-20 > \$5,000
Rodan Builders, Inc.	Other Top-20 > \$5,000
Sakanaya Japanese Restaurant (Jang)	Other Top-20 > \$5,000
Sherman Family Living Trust dtd 3/13/00	Other Top-20 > \$5,000
Sierra Running Company (Samansky)	Other Top-20 > \$5,000
Sky Sushi (Sushi Mon)	Other Top-20 > \$5,000
SMUD	Other Top-20 > \$5,000
SunPoint Public Adjusters, Inc	Other Top-20 > \$5,000
The Donum Estate	Other Top-20 > \$5,000
The Strength Studio	Other Top-20 > \$5,000
The Vyxn (Everk Hospitality, Lewis Everk)	Other Top-20 > \$5,000
TMobile West Corporation	Other Top-20 > \$5,000
Tom DeWitt; Pauline DeWitt	Other Top-20 > \$5,000
Union of American Physicians and Dentists	Other Top-20 > \$5,000

VBM, Inc.	Other Top-20 > \$5,000
Visit Concord, a California not for profit organization	Other Top-20 > \$5,000
WeCare Services For Children	Other Top-20 > \$5,000
West Coast Mechanical	Other Top-20 > \$5,000
West Coast Salon Suites, LLC	Other Top-20 > \$5,000
Zhong Liang Kwan, Karie Xiu Yu	Other Top-20 > \$5,000
K S Mattson Partners, LP	Potentially Adverse
Perris Freeway Plaza, LP	Potentially Adverse
Bank of America	Secured Creditor
Bruce Needleman, Trustee & Edna M. Hayes, Trustee	Secured Creditor
BSM Financial, L.P.	Secured Creditor
California Bank of Commerce	Secured Creditor
Chase Bank	Secured Creditor
Citizens Business Bank ("Citizens")	Secured Creditor
Comerica	Secured Creditor
Duggans Memorial Chapel	Secured Creditor
Duggans Mission Chapel LLC	Secured Creditor
Erick Roeser, CPA	Secured Creditor
Exchange Bank	Secured Creditor
Fannie Mae	Secured Creditor
Federal Home Loan Mortgage Corporation (Freddie Mac)	Secured Creditor
Frank Bragg Revocable Trust	Secured Creditor
Greystone Servicing Company	Secured Creditor
KS Mattson Partners	Secured Creditor
PENSCO Trust Company FBO Leland McAbbe IRA	Secured Creditor
Michael & Ana Cavanaugh	Secured Creditor
Mitchel Bicandi	Secured Creditor
Nationstar Mortgage LLC d/b/a Mr. Cooper	Secured Creditor
NexBank	Secured Creditor
PHH Mortgage Services	Secured Creditor
Placer County Tax Collector	Secured Creditor
Poppy Bank	Secured Creditor
Ronald and Francoise Hodges	Secured Creditor
Select Portfolio Servicing, Inc.	Secured Creditor
Shellpoint Mortgage Servicing	Secured Creditor
Socotra Capital, Inc.	Secured Creditor
Sonoma County Tax Collector	Secured Creditor
Suncrest Bank	Secured Creditor
Susan Patricia Westerbeke, Trustee	Secured Creditor
TriCounties Bank	Secured Creditor
Umpqua Bank	Secured Creditor
U.S. Bank, N.A.	Secured Creditor
Virginia Ghilarducci Trustee	Secured Creditor
Wells Fargo Bank	Secured Creditor
Wilmington Trust, National Association, as Trustee for the Benefit of the Registered Holders of JPMBB Commercial Securities Trust 2015-C30, Commercial Mortgage Pass-Through Certificates, Series 2015-C30	Secured Creditor
Visio International, Inc.	Secured Creditor
Y. Tito Sasaki & Janet L. Sasaki, Trustees	Secured Creditor

Christina Goebelsmann	U.S. Trustee Staff
Mike Chow	U.S. Trustee Staff
Ilanthe V. Del Rosario	U.S. Trustee Staff
Nychelle G. Rivera	U.S. Trustee Staff
Phillip Shine	U.S. Trustee Staff
Yung Nor Wong	U.S. Trustee Staff
Jared Day	U.S. Trustee Staff
Deanna Hazelton	U.S. Trustee Staff
Charles Edgar	UCC Member
Hayes 2004 Family Trust; Bryan & Patricia Hayes	UCC Member
Lull Family Living Revocable Trust; Richard Lull	UCC Member
Manfred K. Fischer Trust; Michaela M. Katari	UCC Member
Mullin Family Trust; John & Kathleen Mullin	UCC Member
Sevpro Vacaville	Former UCC Member
The Anderson 2001 Revocable Trust; Graham & Teresa Anderson	UCC Member
Umbriac & Tubley Family Trust; Mae Umbriac & Andrew Tubley	UCC Member
Walter Schenk	UCC Member
Serene Investment Management LLC	DIP Lender
Loeb & Loeb	Counsel to DIP Lender

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT B
(Hon. Lee Bogdanoff (ret.) JAMS Daily Rate)



Mediation Fee Schedule

Hon. Lee Bogdanoff (Ret.)

PROFESSIONAL FEES

Daily Rate\$9,000

Includes up to 8 hours of session time on the scheduled day and up to 2 hours of reading and research time.

- Other professional time (including additional hearing time, pre- and post-hearing reading and research, and conference calls) will be billed at \$900 per hour. This may include travel time.

Half Day Rate\$6,000

Includes up to 4 hours of session time on the scheduled day and up to 1 hours of reading and research time.

CASE MANAGEMENT FEE

- The Case Management Fee includes access to an exclusive nationwide panel of judges, attorneys, and other ADR experts, dedicated services including all administration through the duration of the case, document handling, and use of JAMS conference facilities including after hours and on-site business support. Weekends and holidays are subject to additional charges.
- The Case Management Fee is reassessed on cases that continue beyond originally scheduled professional time.

Mediations

Initial non-refundable Case Management Fee of \$500 Per Party, applies to first 10 hours of professional time

Time in excess of **initial 10 hours** 13% of Professional Fees

Discovery, Court Appointed Neutral (Reference/Special Master), Appraisal, and Binding Mediation

See Neutral's individual general fee schedule

Neutral Analysis Matters

Contact JAMS for administrative and pricing details.

CANCELLATION/CONTINUANCE POLICY

Number of Days	Cancellation/Continuance Period	Fee
1 day or less	14 days or more prior to session	100% REFUNDABLE, except for time incurred
2 to 4 days	30 days or more prior to session	100% REFUNDABLE, except for time incurred
5 days or more	45 days or more prior to session	100% REFUNDABLE, except for time incurred
Sessions of any length	Inside the cancellation/continuance period	NON-REFUNDABLE

- Unused session time is non-refundable.
- Hearing fees, including all applicable Case Management Fees, are non-refundable if time scheduled (or a portion thereof) is cancelled or continued after the cancellation date unless the Neutral's time can be rescheduled with a hearing in another matter. The cancellation policy exists because time reserved and later cancelled generally cannot be replaced. In all cases involving non-refundable time, the party causing the continuance or cancellation is responsible for the fees of all parties.
- A retainer for anticipated preparation and follow-up time is billed to the parties. Any unused portion is refunded.
- Refund Policy: Payments received from a single source will be issued back to that payer but mailed to the JAMS billing contact. Payments received from multiple sources will be issued and mailed to the JAMS billing contact only. Returned refunds will incur a \$100 reprocessing fee.
- All fees are due and payable by the due date stated in the confirmation letter. Payment must be received in advance of services rendered. JAMS reserves the right to cancel your session if fees are not paid by all parties by the applicable cancellation date and JAMS confirms the cancellation in writing.
- JAMS panelists may use a law clerk depending on the complexity of the case. The parties will be informed of the engagement if the neutral plans to employ a clerk. The clerk's hourly rate will be billed to the parties subject to the agreed fee split and in accordance with JAMS' policies.

JAMS agreement to render services is with the attorney, the party, and/or other representatives of the party.