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**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 ROBBIN L.
ITKIN 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>

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2 I, Robbin L. Itkin, hereby declare pursuant to 28 U.S.C. § 1746:

3 1. I am a restructuring and turnaround professional with over 40 years of wide-ranging
4 experience, including professional experience in the areas of corporate turnarounds, workouts and
5 bankruptcies, including, without limitation, advising fiduciaries in bankruptcy cases and in
6 advising debtors, creditors and stakeholders in all aspects of chapter 11 bankruptcies and sale
7 processes, including the sale of real estate assets and alleged Ponzi schemes. I served as lead
8 counsel for one of three committees of investors in the real estate Ponzi scheme case *In re*
9 *Professional Financial Investors, Inc., et al.*, Case No. 20-30604 (Bankr. N.D. Cal.). Sklar Kirsh
10 LLP, the law firm in which I was then a partner, received the 2022 Turnaround Transaction of the
11 Year Award from the Turnaround Management Association on account of my work, recognizing
12 my unique and collaborative approach to resolving the various competing interests in order to
13 reduce litigation costs and maximize value for the benefit of the victims. I have also served as a
14 chapter 11 and chapter 7 trustee and independent director and independent manager for both
15 healthy and distressed companies.

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

19 3. Except as otherwise indicated, all facts set forth in this declaration are based upon
20 my personal knowledge, information supplied to me by KSMP’s professionals or professionals in
21 the LeFever Mattson chapter 11 cases, and information learned from my review of the available
22 documents and conversations with creditors.

23 4. I am the Responsible Individual for KSMP. On June 9, 2024, the Court entered the
24 Stipulated Order for Relief in an Involuntary Case [Docket No. 131] and appointed me as the
25 Responsible Individual in this case, with effect from June 16, 2025. Docket No. 172.

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

1 5. Based on the information available to me, Socotra holds deeds of trust and
2 assignment of rents on 15 properties held by KSMP with approximately \$27.3 million in total
3 loans.

4 6. In addition, based on information available to me and my advisors, I believe that
5 KSMP may be a borrower on certain loans for properties that were transferred to one of the LFM
6 Debtors, subject to a deed of trust.

7 7. I understand that substantially all the properties that serve as Socotra's collateral
8 were originally purchased by KSMP, an entity at the time controlled by Mr. Mattson, who was
9 also the chief executive officer of LeFever Mattson and in control of the LFM Debtors during the
10 relevant period.

11 8. I am informed that because Socotra was the counterparty to so many apparently
12 self-interested transactions by Mr. Mattson, before my appointment, the Committee spearheaded
13 an investigation to determine whether the LFM Debtors' estates hold claims against Socotra (the
14 "Committee Investigation").

15 9. I understand that, based on the Committee Investigation, the Committee intends to
16 file a complaint against Socotra (the "Committee Complaint"), but does not intend to file the
17 Committee Complaint prior to the Mediation.

18 10. The participants in the Mediation will be the Mediating Parties: (1) the LFM
19 Debtors, (2) KSMP, (3) the Committee, and (4) Socotra.

20 11. The Mediating Parties have agreed on Judge Bogdanoff to serve as the mediator
21 and are confident that his skills and experience will be invaluable in resolving their disputes. I
22 know Judge Bogdanoff from years of practice in the Los Angeles bankruptcy community, but he
23 has never represented me nor have I represented him, nor have I appeared before him in his role
24 as a judge and I have not used him to date as a mediator in a case. He is well respected and known
25 as a capable and experienced mediator, in particular with respect to bankruptcy issues.

26 12. The Mediating Parties have agreed that there shall be an absolute mediation
27 privilege, and all communications during the Mediation shall be confidential and protected from
28 disclosure and shall not constitute a waiver of any existing privileges and immunities, shall not be

1 disclosed to the Court or any third party for any reason, and shall not be used for any purpose other
2 than Mediation. Submissions to the mediator shall not be delivered to anyone else without the
3 consent of the submitting party. Judge Bogdanoff and the Mediating Parties may agree on
4 additional confidentiality provisions in connection with the Mediation.

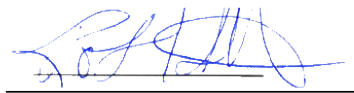
5 13. The scope of the Mediation remains subject to the final agreement of Judge
6 Bogdanoff and Mediating Parties; however, it is the Movants' intent to address and resolve during
7 the mediation as many as possible of the numerous issues concerning Socotra in the Chapter 11
8 Cases.

9 14. I believe that resolving the disputes between Socotra and the other Mediating
10 Parties will be a tremendous milestone in the Chapter 11 Cases, and it will pave the way for
11 confirmation of the Plan.

12 15. I believe that the Mediation Costs are very reasonable considering the potential
13 upside to the Movants' estates in avoided litigation costs.

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

16 Executed September 10, 2025.

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