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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.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

In re

KS MATTSON PARTNERS, LP,
 Debtor.

**DECLARATION OF ERIC LUPINSKI IN
 SUPPORT OF ADEQUATE ASSURANCE
 OF FUTURE PERFORMANCE BY FH-
 EOVBATES, LLC, A DELAWARE
 LIMITED LIABILITY COMPANY, WITH
 RESPECT TO THE ASSUMPTION AND
 ASSIGNMENT OF EXECUTORY LEASES
 AND/OR UNEXPIRED CONTRACTS IN
 CONNECTION WITH THE SALE OF 2280
 BATES AVENUE, CONCORD, CA 94520**

[No Hearing Requested]

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 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/IM>

1 I, Eric Lupinski, declare as follows, pursuant to 28 U.S.C. § 1746:

2 1. I submit this declaration (the “Declaration”) in support of FH-EOV Bates, LLC, a
3 Delaware limited liability company (the “Buyer”) with respect to the assumption and assignment
4 of executory leases and/or unexpired contracts (the “Agreements”) in connection with the sale of
5 the real property located at 2280 Bates Avenue, Concord, California 94520 (the “Subject
6 Property”) from the above-captioned debtors and debtors-in-possession (collectively, the
7 “Debtors”²) pursuant to the Purchase and Sale Agreement dated July 29, 2025, as amended by that
8 certain First Amendment to Purchase and Sale Agreement dated August 29, 2025, and the
9 Assignment of Purchase and Sale Agreement dated September 4, 2025, from Equity Oak Ventures,
10 LLC, a California limited liability company, to the Buyer (collectively, the “Purchase
11 Agreement”), all attached as Exhibit A to Exhibit 1 to the *Notice of Sale of 2280 Bates Avenue,*
12 *Concord, CA 94520*, filed concurrently herewith.

13 2. I am knowledgeable and familiar with the Buyer’s business and financial affairs. I
14 am authorized to submit this Declaration on behalf of the Buyer. Except as otherwise indicated
15 herein, the facts set forth in this Declaration are based upon my personal knowledge, my review
16 of relevant documents, information provided to me by the Buyer or its advisors, or my opinion
17 based upon experience, knowledge, and information concerning the Buyer’s finances. If called
18 upon to testify, I would testify to the facts set forth in this Declaration.

19 3. I am the authorized signatory and co-manager of Equity Oak Ventures, LLC, the
20 sole member of the Buyer.

21 4. The Buyer is an entity that is currently solely owned by Equity Oak Ventures, LLC,
22 which is a privately held real estate investment firm focused on the acquisition, management, and
23 stabilization of commercial properties.

24 5. The indirect ownership interest in the Buyer may be syndicated; however, Equity
25 Oak Ventures, LLC or its affiliate shall maintain majority management control.

26
27
28 ² Unless otherwise indicated, “Debtors” as used herein excludes KSMP LP.

1 6. I have reviewed the financial information for the Subject Property provided by the
2 Debtors, and the Buyer is willing and capable of meeting the financial obligations of the
3 Agreements.

4 7. Accordingly, the Buyer has demonstrated the willingness and ability to perform its
5 obligations under the Purchase Agreement and the assigned Agreements.

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

8
9 Dated: 09/13/2025

/s/ *Eric Lupinski*
Eric Lupinski, Co-Manager
Equity Oak Ventures, LLC


3D - 2280 Bates Declaration (FOR SIG)

Final Audit Report


2025-09-13


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 Signer eric@equityoakventures.com entered name at signing as Eric Lupinski
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