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*Attorneys for the Debtors and
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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

In re

KS MATTSON PARTNERS, LP,
 Debtor.

**DECLARATION OF WILLIAM C. MARKS
 IN SUPPORT OF ADEQUATE
 ASSURANCE OF FUTURE
 PERFORMANCE BY ALLISON PARKWAY
 PARTNERS LLC, A CALIFORNIA
 LIMITED LIABILITY COMPANY, WITH
 RESPECT TO THE ASSUMPTION AND
 ASSIGNMENT OF EXECUTORY LEASES
 AND/OR UNEXPIRED CONTRACTS IN
 CONNECTION WITH THE SALE OF 4950,
 4960, AND 4970 ALLISON PARKWAY,
 VACAVILLE, CA 95688**

[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/LM>

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

2 1. I submit this declaration (the “Declaration”) in support of Allison Parkway Partners
3 LLC, a California limited liability company (the “Buyer”) with respect to the assumption and
4 assignment of executory leases and/or unexpired contracts (the “Agreements”) in connection with
5 the sale of the real property located at 4950, 4960, and 4970 Allison Parkway, Vacaville, California
6 95688 from the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”)¹
7 pursuant to the Purchase and Sale Agreement dated July 21, 2025 (the “Purchase Agreement”)
8 and assignment dated September 3, 2025, attached as Exhibit A to Exhibit 1 to the *Notice of Sale*
9 *of 4950, 4960, and 4970 Allison Parkway, Vacaville, CA 95688*, filed concurrently herewith.

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

16 3. I am the Manager and Principal of the Buyer.

17 4. I am an owner and operator of commercial real estate properties. I have extensive
18 experience owning and operating commercial real estate assets. I am financially capable and
19 willing to fulfill the duties and obligations in the Agreements.

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

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

24
25 Dated: 09/12/25

/s/ William C. Marks

William C. Marks, Manager and Principal
Allison Parkway Partners, LLC

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27
28 ¹ Unless otherwise indicated, “Debtors” as used herein excludes KSMP.