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*Attorneys for the Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California
corporation, *et al.*,
Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

In re

KS MATTSON PARTNERS, LP,
Debtor.

**DECLARATION OF CRISTINA V
BARRAGAN NUNEZ IN SUPPORT OF
ADEQUATE ASSURANCE OF FUTURE
PERFORMANCE BY FINCA REAL
ESTATE HOLDINGS LLC WITH
RESPECT TO THE ASSUMPTION AND
ASSIGNMENT OF EXECUTORY LEASES
AND/OR UNEXPIRED CONTRACTS IN
CONNECTION WITH THE SALE OF 5509
ORANGE AVENUE & 7343 ARLETA
COURT, SACRAMENTO, CA 95823**

[No Hearing Requested]



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1 I, Cristina V Barragan Nunez, declare as follows, pursuant to 28 U.S.C. § 1746:

2 1. I submit this declaration (the “Declaration”) in support of Finca Real Estate
3 Holdings LLC (the “Buyer”) with respect to the assumption and assignment of executory
4 leases and/or unexpired contracts (the “Agreements”) in connection with the sale of the
5 real property located at 5509 Orange Avenue & 7343 Arleta Court, Sacramento,
6 California 95823 (the “Subject Property”) from the above-captioned debtors and debtors-
7 in-possession (collectively, the “Debtors”)¹ pursuant to the California Residential
8 Purchase Agreement dated September 18, 2025 (the “Purchase Agreement”) attached as
9 Exhibit A to Exhibit 1 to the *Notice of Sale of 5509 Orange Avenue & 7343 Arleta Court,*
10 *Sacramento, CA 95823*, filed concurrently herewith.

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

18 3. I am the Manager of the Buyer.

19 4. I am an experienced real estate investor who owns multiple real properties in
20 Sacramento, California. I have a strong interest in building a long-term investment
21 portfolio through real estate.

22 5. The Buyer has secured a loan pre-approval and has verified funds for the required
23 down payment and closing costs. Based on the Buyer’s financial documentation and
24 lender verification, the Buyer has the financial ability to manage and sustain the Subject
25 Property.

26 6. Accordingly, the Buyer has demonstrated the willingness and ability to perform
27 its obligations under the Purchase Agreement and the assigned Agreements.

28 ¹ Unless otherwise indicated, “Debtors” as used herein excludes KSMP and Live Oak Investments, LP.

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

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6 Dated: 11/13/2025

Signed by:
Cristina V Barragan Nunez
/s/ A3B67DE13B6E474...
Cristina V Barragan Nunez

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