

KELLER BENVENUTTI KIM LLP
TOBIAS S. KELLER (Cal. Bar No. 151445)
(tkeller@kbbkllp.com)
DAVID A. TAYLOR (Cal. Bar No. 247433)
(dtaylor@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 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.*,¹
Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

In re

KS MATTSON PARTNERS, LP,
Debtor.

**DECLARATION OF TIMOTHY
MICHAEL VANDERET IN SUPPORT
OF ADEQUATE ASSURANCE OF
FUTURE PERFORMANCE WITH
RESPECT TO THE ASSUMPTION AND
ASSIGNMENT OF EXECUTORY
LEASES AND/OR UNEXPIRED
CONTRACTS IN CONNECTION WITH
THE SALE OF 790 BROADWAY,
SONOMA, CA 95476**

[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>.

I, Timothy Michael Vanderet, declare as follows, pursuant to 28 U.S.C. § 1746:

1. I submit this declaration (the “Declaration”) with respect to the assumption and assignment of executory leases and/or unexpired contracts (the “Agreements”) in connection with the sale of the real property located at 790 Broadway, Sonoma, California 95476 (the “Subject Property”) from the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”)² pursuant to the California Residential Purchase Agreement dated September 17, 2025 (the “Purchase Agreement”) attached as Exhibit A to Exhibit 1 to the *Notice of Sale of 790 Broadway, Sonoma, CA 95476*, filed concurrently herewith.

2. Except as otherwise indicated herein, the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me, or my opinion based upon experience, knowledge, and information concerning my finances. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. I am the purchaser of the Subject Property.

4. I am purchasing the Subject Property with my wife, Laura Rae Daigneau. We have sufficient financial resources to close the transaction and the experience, capability, and desire to continue operating and maintaining the property in a responsible manner.

5. I have reviewed the financial information for the Subject Property provided by the Debtors, and I am capable of meeting the financial obligations of the Agreements.

6. I am willing and able to perform my obligations under the Purchase Agreement and the assigned Agreements.

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

Dated: 11/19/2025


/s/ _____
Timothy Michael Vanderet

² Unless otherwise indicated, “Debtors” as used herein excludes KSMP and Live Oak Investments, LP.