

**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.*,<sup>1</sup>  
Debtors.

In re

KS MATTSON PARTNERS, LP,  
Debtor.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**DECLARATION OF BERTHA  
MAGALLI YOHO 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  
19020, 19022 A & B, 19030 RAILROAD  
AVENUE, SONOMA, CA 95476**

[No Hearing Requested]

<sup>1</sup> 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, Bertha Magalli Yoho, declare as follows, pursuant to 28 U.S.C. § 1746:

2 1. I submit this declaration (the “Declaration”) with respect to the assumption and  
3 assignment of executory leases and/or unexpired contracts (the “Agreements”) in connection  
4 with the sale of the real property located at 19020, 19022 A & B, 19030 Railroad Avenue,  
5 Sonoma, California 95476 (the “Subject Property”) from the above-captioned debtors and  
6 debtors-in-possession (collectively, the “Debtors”) pursuant to the California Residential  
7 Purchase Agreement dated October 27, 2025 (the “Purchase Agreement”) attached as Exhibit A  
8 to Exhibit 1 to the *Notice of Sale of 19020, 19022 A & B, 19030 Railroad Avenue, Sonoma, CA*  
9 *95476*, filed concurrently herewith.

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

14 3. I am the purchaser of the Subject Property.

15 4. I am a seasoned property owner and builder with over 26 years of experience in  
16 the real estate industry. I possess extensive expertise in managing leases and cultivating positive  
17 tenant relationships across both short-term and long-term arrangements, including 1,982 five-star  
18 reviews on Airbnb and more than a dozen positive reviews from long-term tenants over the past  
19 five years. Additionally, I have substantial experience ensuring compliance with safety rules and  
20 regulations, thereby maintaining a safe and healthy living environment for all my tenants. My  
21 commercial expertise is demonstrated by my ownership and operation of three restaurants, as  
22 well as my management of 12 commercial and office space leases.

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

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

27 ///

28 ///

**KELLER BENVENUTTI KIM LLP**

101 MONTGOMERY STREET, SUITE 1950  
SAN FRANCISCO, CALIFORNIA 94104

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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/ Bertha Magalli Yoho  
Bertha Magalli Yoho