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In re:

1 KELLER BENVENUTTI KIM LLP TOBIAS S. KELLER (Cal. Bar No. 151445) 2 (tkeller@kbkllp.com) DAVID A. TAYLOR (Cal. Bar No. 247433) 3 (dtaylor@kbkllp.com) THOMAS B. RUPP (Cal. Bar No. 278041) 4 (trupp@kbkllp.com) 101 Montgomery Street, Suite 1950 5 San Francisco, California 94104 Telephone: (415) 496-6723 6 Facsimile: (650) 636-9251 7 Attorneys for the Debtors and Debtors in Possession 8 9

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

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

In re

KS MATTSON PARTNERS, LP,

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

DECLARATION OF JOSEPH RAMOS IN SUPPORT OF ADEQUATE ASSURANCE OF FUTURE PERFORMANCE BY MJ2 INVESTORS, LLC WITH RESPECT TO THE ASSUMPTION AND ASSIGNMENT OF EXECUTORY LEASES AND/OR UNEXPIRED CONTRACTS IN CONNECTION WITH THE SALE OF 5800 FAIR OAKS BLVD., CARMICHAEL, CA 95608

[No Hearing Requested]

Debtor.

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.

Case:

I, Joseph Ramos, declare as follows, pursuant to 28 U.S.C. § 1746:

1. I submit this declaration (the "<u>Declaration</u>") in support of MJ2 Investors, LLC, a California limited liability company (the "<u>Buyer</u>") with respect to the assumption and assignment of executory leases and/or unexpired contracts (the "<u>Agreements</u>") in connection with the sale of the real property located at 5800 Fair Oaks Boulevard, Carmichael, California 95608, commonly known as the Shelfield Apartments, from the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>")<sup>2</sup> pursuant to the Purchase and Sale Agreement dated November 17, 2025 (the "<u>Purchase Agreement</u>") attached as Exhibit A to Exhibit 1 to the *Notice of Sale of 5800 Fair Oaks Blvd., Carmichael, CA 95608*, filed concurrently herewith.

- 2. I am knowledgeable and familiar with the Buyer's business and financial affairs. I am authorized to submit this Declaration on behalf of the Buyer. 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 by the Buyer or its advisors, or my opinion based upon experience, knowledge, and information concerning the Buyer's finances. If called upon to testify, I would testify to the facts set forth in this Declaration.
  - 3. I am the President of the Buyer.
- 4. I am an accomplished real estate professional with over 20 years of brokerage and investment experience. I am a graduate of San Diego State University with degrees in both Real Estate Finance and Communication. I furthered my real estate investment analysis skills by completing the full complement of the well-acclaimed Certified Commercial Investment Management curriculum. Over the past 15 years, I have participated in over \$1 billion in real estate transactions. I have syndicated the acquisition of over 60 multi-family properties and have been responsible for the management, reposition, and disposition of those assets though renovation, creation and achievement of sound budgeting, and good operational management. In doing so, I have developed expertise for improving curb appeal, durable stability, operational profitability, and market value.

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 $<sup>^2\,</sup>$  Unless otherwise indicated, "Debtors" as used herein excludes KSMP and Live Oak Investments, LP.

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5. I began my real estate career in 2003 as an analyst with Apartment Consultants Inc.		
headquartered in San Diego, California. That same year, I received my real estate license and		
transitioned into full agency. In 2008, I moved my license to affiliate with South Coast		
Commercial in San Diego, California, and worked there through 2013. While there, I honed my		
skills as a top producer, negotiator, and deal maker. In 2014, I moved to Walnut Creek, California		
to take on greater professional challenges and start a family. In 2015, I created North Coas		
Commercial, Inc., which focuses on investment analysis and brokerage of multi-family properties		
throughout Northern California.		

- 6. I have reviewed the Agreements and the Buyer is capable of fulfilling the financial requirements stated therein.
- 7. Accordingly, the Buyer has demonstrated the willingness and ability to perform its 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: 11/20/2025 | 16:46:52 PST

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DocuSigned by:

Joseph Ramos, President MJ2 Investors, LLC, a California limited liability company