

**KELLER BENVENUTTI KIM LLP**  
101 MONTGOMERY STREET, SUITE 1950  
SAN FRANCISCO, CALIFORNIA 94104

**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.*,  
Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

In re

KS MATTSON PARTNERS, LP,  
Debtor.

**DECLARATION OF ALEJANDRINA DIAZ  
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  
7332-7334 ARLETA COURT,  
SACRAMENTO, CA 95823**

[No Hearing Requested]



KELLER BENVENUTTI KIM LLP  
101 MONTGOMERY STREET, SUITE 1950  
SAN FRANCISCO, CALIFORNIA 94104

I, Alejandrina Diaz, 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 7332-7334 Arleta Court, Sacramento, California 95823 (the “Subject Property”) from the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”)<sup>1</sup> pursuant to the California Residential Purchase Agreement dated October 15, 2025 (the “Purchase Agreement”) attached as Exhibit A to Exhibit 1 to the *Notice of Sale of 7332-7334 Arleta Court, Sacramento, CA 95823*, 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 a real estate investor in Sacramento, California. I have a strong interest in building a long-term investment portfolio through real estate, and I take a thoughtful, strategic approach to property ownership.

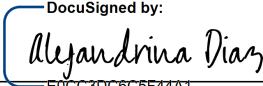
5. I have reviewed the financial information for the Subject Property provided by the Debtors, and I am capable of meeting the financial obligations of the Agreements.

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:

11/24/2025

DocuSigned by:  
  
E0CC3DC6C3F44A1...  
Alejandrina Diaz

<sup>1</sup> Unless otherwise indicated, “Debtors” as used herein excludes KSMP.

**KELLER BENVENUTTI KIM LLP**  
425 MARKET STREET, 26TH FLOOR  
SAN FRANCISCO, CALIFORNIA 94105

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