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

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

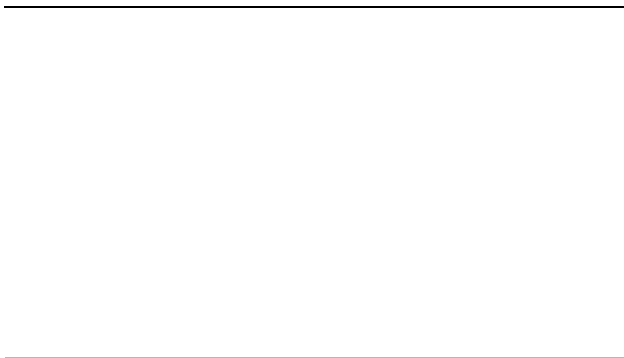
In re

KS MATTSON PARTNERS, LP,  
 Debtor.

**DECLARATION OF JASON BORREO  
 IN SUPPORT OF ADEQUATE  
 ASSURANCE OF FUTURE  
 PERFORMANCE BY G&I XI  
 RIVERVIEW SC LP WITH RESPECT  
 TO THE ASSUMPTION AND  
 ASSIGNMENT OF EXECUTORY  
 LEASES AND/OR UNEXPIRED  
 CONTRACTS IN CONNECTION WITH  
 THE SALE OF 9407; 9415-9471 N. FORT  
 WASHINGTON ROAD, FRESNO, CA  
 93730**

<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>

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[No Hearing Requested]

1 I, Jason Borreo, declare as follows, pursuant to 28 U.S.C. § 1746:

2 1. I submit this declaration (the “Declaration”) in support of G&I XI RIVERVIEW  
3 SC LP (the “Buyer”) with respect to the assumption and assignment of executory leases and/or  
4 unexpired contracts (the “Agreements”) in connection with the sale of the real property located at  
5 9407; 9415-9471 North Fort Washington Road, Fresno, CA 93730 from the above-captioned  
6 debtors and debtors-in-possession (collectively, the “Debtors”) pursuant to the Purchase and Sale  
7 Agreement dated October 23, 2025, amended by that first amendment dated November 24, 2025  
8 (“First Amendment”) and the second amendment dated November 26, 2025 (“Second  
9 Amendment”) (collectively, the “Purchase Agreement”) attached as Exhibit A to Exhibit 1 to the  
10 *Notice of Sale of 9407; 9415-9471 N. Fort Washington Road, Fresno, CA 93730*, filed  
11 concurrently herewith.

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

18 3. I am a Vice President of Buyer

19 4. Buyer is a Delaware limited partnership which is an affiliate of a New York-based  
20 registered investment advisor that specializes in real estate investment management services for  
21 institutional and private investors including pension funds, university endowments, sovereign  
22 wealth funds, foundations, and insurance companies.

23 5. Buyer, by its employees and agents, has reviewed the leases and financial  
24 obligations Buyer is assuming and Buyer is willing and able to assume such leases and obligations

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

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

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425 MARKET STREET, 26TH FLOOR  
SAN FRANCISCO, CALIFORNIA 94105

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Dated: 12/03/2025

  
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Jason Borreo