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*Attorneys for the Debtors and
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**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 MANDEEP KHINDA
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
7301 BERNA WAY & 7319 ARLETA
COURT, SACRAMENTO, CA 95823**

[No Hearing Requested]



KELLER BENVENUTTI KIM LLP
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I, Mandeep Khinda, 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 7301 Berna Way & 7319 Arleta Court, Sacramento, California 95823 (the “Subject Property”) from the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”)¹ pursuant to the Residential Income Purchase Agreement dated September 30, 2025 (the “Purchase Agreement”) attached as Exhibit A to Exhibit 1 to the *Notice of Sale of 7301 Berna Way & 7319 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 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:

12/5/2025

Signed by:

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Mandeep Khinda

¹ Unless otherwise indicated, “Debtors” as used herein excludes KSMP.