KELLER BENVENUTTI KIM LLP TOBIAS S. KELLER (Cal. Bar No. 151445) (tkeller@kbkllp.com) 2 DAVID A. TAYLOR (Cal. Bar No. 247433) (dtaylor@kbkllp.com) 3 THOMAS B. RUPP (Cal. Bar No. 278041) (trupp@kbkllp.com) 4 101 Montgomery Street, Suite 1950 San Francisco, California 94104 5 Telephone: (415) 496-6723 Facsimile: (650) 636-9251 6 Attorneys for LFM Debtors and LFM 7 Debtors in Possession 8 UNITED STATES BANKRUPTCY COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SANTA ROSA DIVISION 11 Lead Case No. 24-10545 (CN) In re: 12 (Jointly Administered) LEFEVER MATTSON, a California 13 corporation, et al.,1 Chapter 11 14 Debtors. **OBJECTION TO CLAIMS OF** 15 LASHAWN JEFFERIES (PROOF OF **CLAIM NOS. 50 AND 460)** 16 In re: 17 Date: February 11, 2026 Time: 11:00 a.m. Pacific Time KS MATTSON PARTNERS, LP, 18 Place: United States Bankruptcy Court 1300 Clay Street, Courtroom 215 19 Oakland, CA 94612 Debtor. 20 21 22 23 24 25

Case: 24-10545 Doc# 3075

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Filed: 12/09/25

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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.

# SAN FRANCISCO, CALIFORNIA 94104

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# (A) THE HONORABLE CHARLES NOVACK, UNITED STATES BANKRUPTCY JUDGE; (B) THE OFFICE OF THE UNITED STATES TRUSTEE; (C) THE AFFECTED CLAIMANT; AND (D) OTHER PARTIES ENTITLED TO NOTICE:

LeFever Mattson, a California corporation ("LeFever Mattson"), and its affiliates that are debtors and debtors in possession (together with LeFever Matson, the "LFM Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases"), file this objection (the "Objection") to the claims of LaShawn Jefferies ("Claimant"), Claim Nos. 50 and 460 (the "Claims"), copies of which (without exhibits or attachments) are attached hereto as **Exhibits A and B**. In support thereof, the LFM Debtors submit the Declaration of Bradley D. Sharp (the "Sharp Declaration"), filed contemporaneously herewith.

### JURISDICTION AND VENUE I.

The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California (the "Bankruptcy Local Rules"). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### II. **BACKGROUND**

### Α. The Chapter 11 Cases

As described in the Declaration of Bradley D. Sharp in Support of Chapter 11 Petitions and First Day Motions [Dkt. No. 5], the Chapter 11 Cases were necessitated by, among other things, Mr. Kenneth Mattson's purported sales of equity interests in many of the Debtors to hundreds of investors through transactions that were not recorded in the books and records of LeFever Mattson or the appropriate Debtor. Debtor Windscape Apartments, LLC, filed its chapter 11 petition on August 6, 2024. Fifty-eight Debtors, including LeFever Mattson, filed their chapter 11 petitions on September 12, 2024. Debtors Pinewood Condominiums, LP, and Ponderosa Pines, LP, filed their chapter 11 petitions on October 2, 2024.

The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The United States

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Trustee appointed an official committee of unsecured creditors (the "Committee") in the Chapter 11 Cases on October 9, 2024, [LFM Dkt. No. 135] and amended its appointment on November 25, 2024 [LFM Dkt. No. 368] and on August 26, 2025 [LFM Dkt. No. 2104]. No trustee or examiner has been appointed in these Chapter 11 Cases.

### B. The Bar Date Order

On December 13, 2024, the Court entered the *Order (1) Establishing Bar Date; (2) Approving Form and Manner of Notice of Bar Date and Procedures with Respect Thereto; and (3) Approving Confidentiality Protocols* [Dkt. No. 459] (the "Bar Date Order"). The Bar Date Order set February 14, 2025, at 11:59 p.m. Pacific Time (the "Bar Date") as the deadline to file all proofs of interest and proofs of claim in respect of any prepetition claim (as defined in section 101(5) of the Bankruptcy Code) against the LFM Debtors.

### C. The Claims

Claimant filed Claim No. 50, in the amount of \$90,000, on October 12, 2024. The basis of the claim is, "The property rent is too high." Claimant asserts that the claim is comprised of a secured amount of \$9,000,000 and an unsecured amount of \$9,000,000. Claimant separately asserts that the claim is based on a lease, and that the amount necessary to cure a default on the lease is \$900,000. The claim includes no exhibits and provides no support for any of the amounts claimed.

Claimant filed a second proof of claim, No. 460, on February 3, 2025. It appears to be in the amount of \$9,000,000. The basis of the claim is, "lease maintenance on property." Claimant asserts that the claim is comprised of a secured amount of \$90,000,000 and an unsecured amount of \$90,000,000, with an annual interest rate of 100%. Claimant separately asserts that the claim is based on a lease, and that the amount necessary to cure a default on the lease is \$90,000,000. The claim attaches what appears to be Claimant's lease as a tenant of 7308 Arleta Court—a property previously owned by Debtor Valley Oak Investments, LP ("Valley Oak")<sup>2</sup> and managed by Debtor Home Tax Service of America, Inc., dba LeFever Mattson Property Management—

<sup>&</sup>lt;sup>2</sup> Valley Oak sold the property on September 30, 2025. See Dkt. No. 2739.

along with a \$6,784 invoice issued by Accent Carpet One to Silver Fern Construction. The claim includes no other exhibits and provides no support for the amounts claimed.

The LFM Debtors' books and records show that, while Claimant was indeed a tenant of 7308 Arleta Court from January 2023 to October 2024, there are no amounts owing to Claimant. This is consistent with the current schedules of Valley Oak, which do not list Mr. Jefferies as a creditor. *See Amended Schedules of Assets and Liabilities for Valley Oak Investments, LP* [Dkt. No. 2297].<sup>3</sup>

# III. THE OBJECTION AND REQUEST FOR RELIEF

A claim may not be allowed if it "is unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1). The LFM Debtors object to the Claims pursuant to section 502(b)(1) because they are entirely unsupported by evidence and thus unenforceable as a matter of law. The LFM Debtors' books and records show no debt to Claimant, and the Claims themselves do nothing to explain or support their asserted amounts. Needless to say, alleged damages ranging from \$90,000 to \$90,000,000 are not substantiated by a copy of a residential lease and an (apparently unrelated) carpet cleaning invoice for \$6,784.

Once the objector raises "facts tending to defeat the claim by probative force equal to that of the allegations of the proofs of claim themselves," Wright v. Holm (In re Holm), 931 F.2d 620, 623 (9th Cir. 1991), quoting 3 L. King, Collier on Bankruptcy § 502.02 at 502-22 (15th ed. 1991), then "the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence," Ashford v. Consolidated Pioneer Mortgage (In re Consolidated Pioneer Mortgage), 178 B.R. 222, 226 (B.A.P. 9th Cir. 1995) (quoting In re Allegheny Int'l, Inc., 954 F.2d 167, 173-74 (3d Cir. 1992)), aff'd without opinion 91 F.3d 151 (9th Cir. 1996). "[T]he ultimate burden of persuasion is always on the claimant." Holm, 931 F.2d at 623 (quoting King, Collier on Bankruptcy); see also Lundell v. Anchor Constr. Specialists, Inc., 223 F.3d 1035, 1039 (9th Cir. 2000), Spencer v. Pugh (In re Pugh), 157 B.R. 898, 901 (B.A.P. 9th Cir. 1993); In re Fidelity

<sup>&</sup>lt;sup>3</sup> Valley Oak's original schedules, filed on November 15, 2024, showed that Valley Oak held a security deposit for Claimant in the amount of \$1725. *See Schedules of Assets and Liabilities and Statement of Financial Affairs for Valley Oak Investments, LP* [Dkt. No. 344]. Valley Oak refunded that deposit to Claimant, after deducting for repairs, on or about November 15, 2024.

the Claims are unenforceable and should be disallowed.

IV. RESERVATION OF RIGHTS

The LFM Debtors hereby reserve the right to object, as applicable, in the future to any of the claims listed in this Objection on any ground, and to amend, modify, or supplement this Objection to the extent an objection to a claim is not granted, and to file other objections to any proofs of interest or proofs of claim filed in these cases, including, without limitation, objections as to the amounts asserted therein, or any other claims (filed or not) against the LFM Debtors, regardless of whether such claims are subject to this Objection. A separate notice and hearing will be scheduled for any such objections. Should the grounds of objection specified herein be overruled or withdrawn, wholly or in part, the LFM Debtors reserve the right to object to the Claims on any other grounds that the LFM Debtors may discover or deem appropriate.

Holding Co., 837 F.2d 696, 698 (5th Cir. 1988). Absent some further showing by Claimant "to

prove the validity of the claim[s] by a preponderance of the evidence," Ashford, 178 B.R. at 226,

### V. NOTICE

Notice of this Motion will be provided to (i) the United States Trustee; (ii) the Committee; (iii) the Claimant, (iv) those persons who have formally appeared in these Chapter 11 Cases and requested service pursuant to Bankruptcy Rule 2002. Based on the circumstances surrounding this Objection and the nature of the relief requested herein, the LFM Debtors respectfully submit that no further notice is required.

WHEREFORE, the Debtors respectfully request that the Court enter an order disallowing the claim in its entirety and granting such other and further relief as the Court may deem just and appropriate.

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Dated: December 9, 2025 KELLER BENVENUTTI KIM LLP By: /s/ David A. Taylor David A. Taylor Attorneys for the LFM Debtors and LFM Debtors in Possession 

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1	Exhibit A
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Fill in this information to identify the case:

Debtor 1 LeFever Mattson, a California corporation

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court California Northern Bankruptcy Court Case number: 24–10545

Claim #50 Date Filed: 10/12/2024

**FILED** 

U.S. Bankruptcy Court California Northern Bankruptcy Court

10/12/2024

Edward J. Emmons, Clerk

Official Form 410
Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim					
1.Who is the current creditor?	Lashawn Jefferies				
or outlier.	Name of the current creditor (the person or entity to be paid	for this claim)			
	Other names the creditor used with the debtor				
2.Has this claim been acquired from someone else?	<ul><li>□ No</li><li>☑ Yes. From whom?</li><li>Lefever Madison</li></ul>				
3. Where should notices and payments to the	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)			
creditor be sent?	Lashawn Jefferies				
Federal Rule of	Name	Name			
Bankruptcy Procedure (FRBP) 2002(g)	7308 Arleta Court Sacramento California 95823				
	,				
	Contact phone	Contact phone			
	Contact email	Contact email			
	Uniform claim identifier for electronic payments in chapter 13 (if you use one):				
4.Does this claim amend one already filed?	No No Yes. Claim number on court claims registry (if know	n) Filed on			
		MM / DD / YYYY			
5.Do you know if anyone else has filed a proof of claim for this claim?	Yes. Who made the earlier filing? I ashawr	n Jefferies			

Official Form 410 Proof of Claim page 1

number you use to identify the debtor?	□ <b>⊻</b>	No Yes. Last 4 digits of the debtor's according	unt or any number you use	to identify the	e debtor:	5638
7.How much is the claim?	\$					•
		(	Yes. Attach statement other charges required	by Bankru	ptcy Rule 30	001(c)(2)(A).
B.What is the basis of the claim?	dea Ban Limi	mples: Goods sold, money loand th, or credit card. Attach redacte kruptcy Rule 3001(c). it disclosing information that is en The porperty rent is to high	d copies of any docum	ents suppo	orting the cla	im required by
9. Is all or part of the claim secured?		Yes. The claim is secured by a li  Nature of property:  ☑ Real estate. If the claim is		r's principa Form 410-	ll residence, -A) with this	file a Mortgage Proof of Claim.
		Basis for perfection:				
		Attach redacted copies of docuinterest (for example, a mortga document that shows the lien h	age, lien, certificate of t	itle, financi	e of perfection	on of a security t, or other
		Value of property:	\$		_	
		Amount of the claim that is secured:	\$ 9000000.00		_	
		Amount of the claim that is unsecured:	\$ 9000000.00		_unsecured :	f the secured and amounts should amount in line 7.)
		Amount necessary to cure a date of the petition:	ny default as of the	\$		
		Annual Interest Rate (when c	case was filed)		%	
		<ul><li>✓ Fixed</li><li>☐ Variable</li></ul>			_	
10. <b>Is this claim based or</b>	n 🗆	No Yes. Amount necessary to cupetition.	ure any default as of	the date o	f the \$	900000.00
a lease?		petition.				

Official Form 410 Proof of Claim page 2

40 le all or part of the claim		No					
12.Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?	<b>▽</b>	No Yes. <i>Check a</i>	all that apply:				Amount entitled to priority
A claim may be partly priority and partly	_	☐ Domestic sunder 11 U	upport obligat .S.C. § 507(a)	ions (includi )(1)(A) or (a)	ng alimony ar (1)(B).	nd child support)	\$
nonpriority. For example in some categories, the law limits the amount entitled to priority.		☑ Up to \$3,35 property or U.S.C. § 50	services for p	s toward pure ersonal, fam	chase, lease, iily, or housel	or rental of nold use. 11	\$ 30000.00
		☐ Wages, sala 180 days be	. , . ,	ruptcy petiti	on is filed or t	the debtor's	\$
		☐ Taxes or per 507(a)(8).	enalties owed	to governme	ental units. 11	U.S.C. §	\$
		☐ Contribution	ns to an emplo	oyee benefit	plan. 11 U.S.	C. § 507(a)(5).	\$
		☐ Other. Spec	cify subsection	n of 11 U.S.(	C. § 507(a)(_)	that applies	\$
		* Amounts are sul of adjustment.	bject to adjustme	ent on 4/01/25 a	and every 3 year	s after that for case	es begun on or after the date
Part 3: Sign Below							
The person completing this proof of claim must	Che	ck the appropri	ate box:				
sign and date it. FRBP	V	I am the credit	or.				
9011(b).		I am the credit	or's attorney	or authorized	l agent.		
If you file this claim electronically, FRBP		I am the truste	e, or the debt	or, or their a	uthorized age	ent. Bankruptcy I	Rule 3004.
5005(a)(2) authorizes courts	<ul> <li>□ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.</li> <li>□ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.</li> </ul>						
to establish local rules specifying what a signature is.	I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.						
A person who files a fraudulent claim could be	I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.						
fined up to \$500,000, imprisoned for up to 5 years, or both.	I declare under penalty of perjury that the foregoing is true and correct.						
18 U.S.C. §§ 152, 157 and 3571.	Exe	ecuted on date	10/12/20	)24			
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	, , ,	T 1 T CC :					
		Lashawn Jefferies	S			_	
	Ū	ature t the name of th	na nareon who	is completi	na and cianin	a this claim:	
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				Identify the co	rporate servicer	as the company if	the authorized agent is a
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				Number Stre			
				sacramento,	CA 95823		
	<b>C</b> -	oto ot phan-		City State 2			
	Cor	ntact phone	5102274515		Email	shawnluvu2@gr	nail.com

Official Form 410 Proof of Claim page 3

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Exhibit B

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Claim #460 Date Filed: 2/3/2025

Fill in this information to identify the case:	
Debtor 1 Lashaun Lettenes	
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court for the: Novempistrict of Calasomou  Case number 34-10545-Ch)	

# Official Form 410

# **Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Cla	aim			.e
. Who is the current creditor?	Name of the current creditor (the person of entity to be paid for this claim.) Other names the creditor used with the debtor	m)		
Has this claim been acquired from someone else?	No Yes. From whom?			1
Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?  Lashaun Jeffenes  Name  1308 Arleta Ct  Number Street  Sacramento Ca 95823  City State ZIP Code	Where should paym different)  Name  Number Street  City	ents to the creditor	be sent? (if
RECEIVED FEB 0 3 2025	Contact phone 510221-4515  Contact email 5haun 14v42 & gmail Com  Uniform claim identifier for electronic payments in chapter 13 (if you us	Contact email		
ERITA GLOBAL				
Does this claim amend one already filed?	☐ No ☑ Yes. Claim number on court claims registry (if known)	( ( ( ( \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Filed on MM / D	<u>2</u> 24
5. Do you know if anyone else has filed a proof of claim for this claim?	No Yes. Who made the earlier filing?			

3.	Do you have any number you use to identify the debtor?				
7.	How much is the claim?	SOLOGOO  Does this amount include interest or other charges?  □ No  ☑ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).			
8.	What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  Limit disclosing information that is entitled to privacy, such as health care information.			
	secured?	Nature of property:  Real estate. If the claim is secured by the debtor's principal residence, file a Mortgage Proof of Claim  Attachment (Official Form 410-A) with this Proof of Claim.  Motor vehicle Other. Describe:  Basis for perfection:  Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  Value of property:  Amount of the claim that is secured:  \$\frac{90.000.600}{40.000}\$ (The sum of the secured and unsecured amounts should match the amount in line 7)  Amount necessary to cure any default as of the date of the petition:  \$\frac{10,000,000}{000}\$			
	RECEIVE	•			
	FEB 0 3 20	25 🙀 Fixed			
	VERITA GLC	BAL			
1	0. Is this claim based on a lease?	□ No  No  Yes. Amount necessary to cure any default as of the date of the petition.  \$\frac{90,000,000}{2}\$			
1	Is this claim subject to a right of setoff?	No Yes. Identify the property: Lefever Mattson a Corporation			

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Proof of Claim page 2

2. Is all or part of the claim	□No	e e e e e e e e e e e e e e e e e e e
entitled to priority under 11 U.S.C. § 507(a)?	Yes. Check one:	Amount entitled to priority
A claim may be partly priority and partly	Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$
nonpriority. For example, in some categories, the law limits the amount entitled to priority.	Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$3,350
Gilliaca to priority.	□ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$
	☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$
	☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$
	Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$
	* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after	r the date of adjustment.
Part 3: Sign Below		
_	Oh ali the convenients how	,
The person completing this proof of claim must	Check the appropriate box:	
sign and date it. FRBP 9011(b).	I am the creditor.  I am the creditor's attorney or authorized agent.	
If you file this claim	I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.	
electronically, FRBP	I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.	
5005(a)(2) authorizes courts to establish local rules		
specifying what a signature is.	I understand that an authorized signature on this <i>Proof of Claim</i> serves as an acknowledgment to amount of the claim, the creditor gave the debtor credit for any payments received toward the debtor.	hat when calculating the ebt.
A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5	I have examined the information in this <i>Proof of Claim</i> and have a reasonable belief that the information correct.	
years, or both. 18 U.S.C. §§ 152, 157, and	I declare under penalty of perjury that the foregoing is true and correct.	
3571.	Executed on date \( \frac{1}{MM} / \text{DD} / \text{YYYYZS} \)	
	Lashaun Jeffenes	
	Print the name of the person who is completing and signing this claim:	6
	Name Last name Last name	ies
	Lefever Mattson	
	Title COLOR ON COLOR ON COLOR	
	Identify the corporate servicer as the company in the authorized agent is a servicer.	
	Address 7308 Arleta Ct	
RECEIVED	Number Street	<b>3</b>
FEB 0 3 2025	Sacramento Ch 9502 City State ZIP Code	<u></u>
VERITA GLOBA	510 222 215 2	nluvu200 gmai
VEKHAULUUM	916706-2685	com

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Official Form 410 Proof of Claim