

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.*,<sup>1</sup>

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**DECLARATION OF BRADLEY D.  
SHARP IN SUPPORT OF OBJECTION  
TO CLAIMS OF LASHAWN  
JEFFERIES (PROOF OF CLAIM NOS.  
50 AND 460)**

In re:

KS MATTSON PARTNERS, LP,

Debtor.

**Date:** February 11, 2026

**Time:** 11:00 a.m. Pacific Time

**Place:** United States Bankruptcy Court  
1300 Clay Street, Courtroom 215  
Oakland, CA 94612

<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://veritaglot>



1 I, Bradley D. Sharp, hereby declare as follows:

2 1. I am the President and Chief Executive Officer of Development Specialists, Inc.  
3 (“DSI”), a leading provider of management consulting and financial advisory services, including  
4 turnaround consulting, fiduciary roles, and financial restructuring services, with numerous offices  
5 throughout the country.

6 2. I am the Chief Restructuring Officer of the LFM Debtors<sup>2</sup> in these Chapter 11  
7 Cases.

8 3. I submit this Declaration in support of the *Objection to Claims of LaShawn Jefferies*  
9 (*Proof of Claim Nos. 50 and 460*) (the “Objection”), filed concurrently herewith.

10 4. Except as otherwise indicated, all facts set forth in this declaration are based upon  
11 my personal knowledge; information supplied to me by other members of the Debtors’  
12 management, employees, and professionals; information learned from my review of relevant  
13 documents; or my opinion given my experience and my knowledge of the Debtors’ operations and  
14 financial condition. If called upon to testify, I could and would testify competently to the facts set  
15 forth herein. I am authorized by the Debtors to submit this declaration.

16 5. LaShawn Jefferies (“Claimant”) filed Claim No. 50, in the amount of \$90,000, on  
17 October 12, 2024. Claimant asserts that the claim is comprised of a secured amount of \$9,000,000  
18 and an unsecured amount of \$9,000,000. Claimant separately asserts that the claim is based on a  
19 lease, and that the amount necessary to cure a default on the lease is \$900,000. The claim includes  
20 no exhibits and provides no support for any of the amounts claimed.

21 6. Claimant filed a second proof of claim, No. 460, on February 3, 2025. It appears  
22 to be in the amount of \$9,000,000. The basis of the claim is, “lease maintenance on property.”  
23 Claimant asserts that the claim is comprised of a secured amount of \$90,000,000 and an unsecured  
24 amount of \$90,000,000, with an annual interest rate of 100%. Claimant separately asserts that the  
25 claim is based on a lease, and that the amount necessary to cure a default on the lease is  
26 \$90,000,000. The claim attaches what appears to be Claimant’s lease as a tenant of 7308 Arleta

27 \_\_\_\_\_  
28 <sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings given to  
them in the Objection.

1 Court—a property previously owned by Debtor Valley Oak Investments, LP (“Valley Oak”) and  
2 managed by Debtor Home Tax Service of America, Inc., dba LeFever Mattson Property  
3 Management—along with a \$6,784 invoice issued by Accent Carpet One to Silver Fern  
4 Construction. The claim includes no other exhibits and provides no support for the amounts  
5 claimed.

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

11 8. Valley Oak’s original schedules, filed on November 15, 2024, showed that Valley  
12 Oak held a security deposit for Claimant in the amount of \$1725. *See Schedules of Assets and*  
13 *Liabilities and Statement of Financial Affairs for Valley Oak Investments, LP* [Dkt. No. 344].  
14 Valley Oak refunded that deposit to Claimant, after deducting for repairs, on or about  
15 November 15, 2024.

16 I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct. Executed on December 9, 2025.

18  
19 /s/ Bradley D. Sharp  
20 Bradley D. Sharp  
21  
22  
23  
24  
25  
26  
27  
28