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 Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re:

LEFEVER MATTSON, a California
 corporation, *et al.*,¹

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**DECLARATION OF BRADLEY D.
 SHARP IN SUPPORT OF OBJECTION
 TO CLAIM OF CASEY THOMPSON
 AND MICHAEL DESANTIS (PROOF
 OF CLAIM NO. 905)**

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

¹ 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 Debtors² in these Chapter 11
7 Cases.

8 3. I submit this Declaration in support of the *Objection to Claim of Casey Thompson*
9 *and Michael DeSantis (Proof of Claim No. 905)* (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. The Claim attaches a “Co-Ownership Agreement” for 222 W. Spain in Sonoma,
17 California, (the “Property”) between the Claimants and KS Mattson Partners, LP (the “Co-
18 Ownership Agreement”).

19 6. The Co-Ownership Agreement was partially executed by only DeSantis, dated
20 March 17, 2020. The Co-Ownership Agreement purports to grant a 25% interest in the Property
21 to the Claimants. The Co-Ownership Agreement provides that “the parties shall execute a Deed
22 of Trust [*sic*] to reflect the DeSantis/Thompson interest.” A title search for the Property prepared
23 at my direction does not show any such instrument was recorded.

24 7. The title search showed that KSMP was the record owner of the Property in 2020
25 but it was subsequently transferred to RT Capitol Mall, which was the record owner of the Property
26 as of the date it filed its voluntary petition.

27 _____
28 ² Capitalized terms used but not otherwise defined herein shall have the meanings given to
them in the Objection.

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8. The LFM Debtors' books and records do not show any amount owing to the Claimants, and the Claim itself does nothing to explain or support the asserted amount. This is consistent with the current schedules of RT Capitol Mall which do not list the Claimants as creditors. *See Amended Schedules of Assets and Liabilities for RT Capitol Mall, LP* [Dkt. No. 2289].

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

/s/ Bradley D. Sharp
Bradley D. Sharp