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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SANTA ROSA DIVISION

In re: LEFEVER MATTSON, Consolidated Debtor.	Case No. 24-10545 HLB (Substantively Consolidated) Chapter 11 **DECLARATION OF KRISTIN D. RIVERA IN SUPPORT OF FOURTH OMNIBUS MOTION OF THE LFM PLAN RECOVERY TRUSTEE TO ALLOW CONSENSUALLY RESOLVED INVESTOR CLAIMS**

I, Kristin D. Rivera, declare:

1. I am a partner in the Investigations and Forensics practice as PricewaterhouseCoopers Advisory Services LLC ("PwC"), a leading financial advisory services firm. I am resident in PwC's San Francisco office.

2. I submit this Declaration in support of the *Fourth Omnibus Motion of the LFM Plan Recovery Trustee to Allow Consensually Resolved Investor Claims* (the "Motion")[1] filed contemporaneously herewith.

[1] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

3. On April 8, 2025, the Court entered an order [Docket No. 1235] (the "PwC Retention Order") approving (a) the employment and retention of PwC as financial advisor to the Committee, effective as of January 9, 2025, pursuant to the terms and conditions set forth in PwC's engagement letter with the Committee; and (b) the employment and retention of PwC as financial advisor to the Committee, effective as of February 17, 2025, pursuant to the terms and conditions set forth in an additional services engagement letter among PwC, the Committee, and Committee counsel at Pachulski Stang Ziehl & Jones LLP ("PSZJ"). The PwC Retention Order authorized PwC to provide services to the Committee, which services included, without limitation, to conduct analysis of investor proofs of interest, associated documents, and financial data and proofs of claim filed by investors against the Consolidated Debtor (the "Investor Claims").

4. In my current position, my area of responsibility includes the effort by PwC, to review and assess the validity of Investor Claims asserted against the Consolidated Debtor. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon my personal knowledge, the knowledge of other PwC professionals working under and alongside me on this matter, my discussions with the Committee and its then-counsel, the Consolidated Debtor's various advisors and counsel, the PRT's various other advisors and counsel, and my review of relevant documents and information prepared by the former Committee and the Consolidated Debtor. If called upon to testify, I would testify competently to the facts set forth in this Declaration. I am authorized to submit this declaration on behalf of the PRT.

5. The PwC team has been actively and intimately involved in the claims review and reconciliation process. PwC was charged with calculating Investor Tranche 1 and Tranche 2 Claims and preparing the schedule (Schedule 1) attached to each *Investor Claim Settlement Offer Letter*. Schedule 1 listed each of an Investor's investments detailing the amount invested (*i.e.*, cash in) and the distributions associated with each investment (*i.e.*, cash out). Each investment on Schedule 1 to the *Investor Claim Settlement Offer Letter* was affiliated with a claim number or sub-claim number.[2]

[2] A sub-claim number was used when a Proof of Interest listed multiple investments.

6. In accordance with Solicitation Procedures Order,[3] the Committee sent each Investor an *Investor Claim Settlement Offer Letter* in their solicitation packages setting forth the Committee's calculation of the Investor's Tranche 1 Claim and Tranche 2 Claim. If an Investor agreed with the calculations in their *Investor Claim Settlement Offer Letter*, the Investor was asked to sign the letter and return a copy to PSZJ. If an Investor had a question or disagreed with the calculations on their *Investor Claim Settlement Offer Letter*, they were encouraged to reach out, and a PwC team member would schedule a time to speak with them to review their *Investor Claim Settlement Offer Letter*.[4] As a result of this process, over 575 Investors have signed and accepted the proposed calculations of their Investor Tranche 1 Claim and Tranche 2 Claim.

7. Additionally, PwC has coordinated with the Consolidated Debtor's advisors in the process of reconciling filed claims and interests with the Consolidated Debtor's schedules to determine the validity of certain Proofs of Claim and Proofs of Interest based on those schedules. PwC is now supporting, and will continue to support, the efforts of the PRT and its counsel to resolve disputed claims, including disputed Investor Claims as necessary, and to update the claims register to reflect the resolutions reached with Investors.

8. With respect to the Investor Claims listed on **Schedule 1** to the Order, each of the Investors identified on **Schedule 1** to the Order were sent an *Investor Claim Settlement Offer Letter*, which included the proposed amounts of their Tranche 1 Claim and Tranche 2 Claim. The *Investor Claim Settlement Offer Letter* also detailed how the Committee's professionals calculated an Investor's Tranche 1 Claim and Tranche 2 Claim, including the claim number or sub-claim number[5] affiliated with each investment, the name associated with each investment according to the information available, as well as the amount invested (*i.e.*, cash in) and the distributions associated with each

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[3] *Order (I) Approving the Plan Summary and Approving Disclosure Statement; (II) Scheduling Status Conference on Confirmation of Plan and Approving the Form and Manner of Service of the Confirmation Notice; (III) Establishing Procedures for the Solicitation and Tabulation of Votes on Plan; (IV) Estimating Investor Claims and Interests Solely for Voting Purposes; and (V) Approving Related Matters* [Docket No. 3105].

[4] Some of these meetings resulted in PwC issuing a revised Investor Claim Settlement Offer Letter to reflect new information.

[5] A sub-claim number was used when a Proof of Interest listed multiple investments. Further, if an investor filed multiple or duplicate claims for an investment, Schedule 1 to the *Investor Claim Settlement Offer Letter* only listed one claim number or sub-claim number for that investment.

investment (*i.e.*, cash out) executed an *Investor Claim Settlement Offer Letter* agreeing with the proposed calculations of their Tranche 1 Claim and Tranche 2 Claim. To determine the name associated with each investment, PwC reviewed multiple sources including bank records, copies of cancelled checks, documents provided by the Investor, the Debtors' books and records, and other documents sourced from third parties.

9. Each of the Investors identified on **Schedule 1** to the Order returned to the Committee's then-professionals a signed *Investor Settlement Offer Letter* indicating that they accept and agree with the proposed calculations of their Tranche 1 Claim and Tranche 2 Claim. The amounts set forth on **Schedule 1** to the Order in the column identified as "Allowed Claims" are identical to the amounts set forth in the corresponding signed *Investor Claim Settlement Offer Letter*.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed on July 28, 2026.

/s/ Kristin D. Rivera
Kristin D. Rivera