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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 BROOKE E. WILSON IN SUPPORT OF THE CONSOLIDATED DEBTOR'S OPPOSITION TO SOCOTRA CAPITAL INC'S MOTION FOR ORDER TO RELEASE FUNDS AND PAY LEGAL FEES AND EXPENSES UNDER COURT-APPROVED SETTLEMENT AGREEMENT**

I, Brooke E. Wilson, declare as follows:

1. I am an associate at Pachulski Stang Ziehl & Jones LLP ("PSZJ"), counsel to the consolidated debtor LeFever Mattson, a California corporation (the "Consolidated Debtor").

2. I submit this declaration pursuant to 28 U.S.C. § 1746 in support of the *Opposition of the Consolidated Debtor to Socotra Capital Inc's Motion for Order to Release Funds and Pay Legal Fees and Expenses Under Court-Approved Settlement Agreement* (the "Opposition") filed concurrently herewith.[1]

[1] Capitalized terms used but not defined herein have the meanings given to them in the Opposition.

3. Except as otherwise indicated, all facts set forth in this declaration are based upon my personal knowledge, information supplied to me by other attorneys at PSZJ, or learned from my review of relevant documents or upon my opinion based upon my experience and knowledge. If called upon to testify, I could and would testify competently to the facts set forth herein. I am authorized by the Consolidated Debtor to submit this declaration.

4. Attached hereto as Exhibit A is a true and correct copy of the *Seller's Final Settlement Statement*, dated March 10, 2026 (the "Closing Statement") for the bulk sale of the Pinyon Properties, which PSZJ obtained from FTI Consulting, Inc. on August 6, 2026.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 6, 2026 at San Francisco, California.

/s/ Brooke E. Wilson
Brooke E. Wilson

Exhibit A

Commonwealth Land Title Company
99 Almaden Boulevard, Suite 840
San Jose, CA 95113
Phone: (669)231-7680 Fax: (408)273-6471

Seller's Final Settlement Statement

Closing Date:	March 10, 2026
Order Number:	932501556A
Escrow Officer:	Kiley Demaree
Buyer:	EDC BADGER LLC, a California limited liability company 11090 Trails End Court Truckee, CA 96161
Seller:	LeFever Mattson, a California corporation 333 South Grand Avenue, Suite 4100 Los Angeles, CA 90071
Property:	10298 thru 10396 Badger Lane and 101 thru 110 Quail Court Truckee, CA 96161-4406

		Seller Debit	Seller Credit
Total Consideration			
Purchase Price			23,750,000.00
Prorations / Adjustments			
Independent Consideration			100.00
Rent(s) Monthly 22 days @ 780.645161 per day at $24,200.00 03/10/26-04/01/26		17,174.19	
Security Deposit(s)		25,000.00	
Buyer credit from seller		1,225,000.00	
Payoffs			
Principal Balance to Socotra		10,586,728.00	
Payoff Lien to Monley Hamlin		2,180,611.98	
Principal Balance	2,175,971.82		
Additional Interest (From 02/27/26 Through 03/10/26 @ 386.680000 Per Diem)	4,640.16		
Total Payoff	2,180,611.98		
Title / Settlement Charges			
Owner's Policy Premium to Commonwealth Land Title Company Coverage: $23,750,000.00 Version: CLTA Standard Coverage Owner's Policy - 2022		20,223.00	
FTB Processing Fee to Commonwealth Land Title Company		45.00	
Payoff Demand Fee to Commonwealth Land Title Company		50.00	
Overnight/Messenger Fees to Commonwealth Land Title Company		84.45	
Recording Service Fee (CA 999) to Simplifile		30.00	
Binder 14 Properties $23,750,000 seller credit to Commonwealth Land Title Company		2,022.30	
Recording Charges			
Recording Fee - Deed to Simplifile		20.85	
Placer County Transfer Tax to Simplifile		26,125.00	

	Seller Debit	Seller Credit
Recording Charges (continued)		
Recording Fee - Release/Reconveyance/Court Order to Simplifile	2,279.15	
Miscellaneous Charges		
Supplemental Taxes to Placer County Treasurer & Tax Collector	16,152.16	
2025-2026 1st Installment plus pen. to Placer County Treasurer & Tax Collector 1st w/pen 107-170-001-000 107-170-002-000 107-170-003-000 107-170-004-000 107-170-005-000 107-170-006-000 107-170-007-000 107-170-008-000 107-170-009-000 107-170-010-000 107-170-011-000 107-170-012-000 107-170-013-000 107-170-014-000 107-170-015-000 107-170-016-000 107-170-017-000 107-170-018-000 107-170-019-000 107-170-020-000 107-170-021-000 107-170-022-000 107-170-023-000 107-170-024-000 107-170-025-000 107-170-026-000 107-170-027-000 107-170-028-000 107-170-029-000 107-170-030-000 107-170-031-000 107-170-032-000 107-170-033-000 107-170-034-000 107-170-035-000 107-170-036-000 107-170-037-000 107-170-038-000	163,770.19	
2nd Installment 2025-2026 BUYER $92,948.47 to Placer County Treasurer & Tax Collector 2nd Installment 107-170-001-000 107-170-002-000 107-170-003-000 107-170-004-000 107-170-005-000 107-170-006-000	148,882.06	

	Seller Debit	Seller Credit
Miscellaneous Charges (continued)		
107-170-007-000 107-170-008-000 107-170-009-000 107-170-010-000 107-170-011-000 107-170-012-000 107-170-013-000 107-170-014-000 107-170-015-000 107-170-016-000 107-170-017-000 107-170-018-000 107-170-019-000 107-170-020-000 107-170-021-000 107-170-022-000 107-170-023-000 107-170-024-000 107-170-025-000 107-170-026-000 107-170-027-000 107-170-028-000 107-170-029-000 107-170-030-000 107-170-031-000 107-170-032-000 107-170-033-000 107-170-034-000 107-170-035-000 107-170-036-000 107-170-037-000 107-170-038-000 includng buyer credit for prorations $92,948.47		
2024-2025 Delinquent Taxes to Placer County Treasurer & Tax Collector	315,928.52	
Demand for payoff to Placer County Treasurer & Tax Collector	33,895.26	
Transaction Fee to FTI Consulting	333,750.00	
Insurance (OCIP seller paid from credit $161,672.74) to Acrisure West Insurance Services, LLC	161,672.74	
Commissions		
Listing Agent Commission to Tahoe Mountain Realty	333,750.00	
Selling Agent Commission to Chase International	333,750.00	
Subtotals	15,926,944.85	23,750,100.00
Balance Due TO Seller	**7,823,155.15**	
Totals	23,750,100.00	23,750,100.00

THIS IS A CERTIFIED COPY OF THE ORIGINAL DOCUMENT(S) BY
COMMONWEALTH LAND TITLE COMPANY

Kiley Demaree

Commonwealth Land Title Company, Settlement Agent