**KELLER BENVENUTTI KIM LLP**
TOBIAS S. KELLER (Cal. Bar No. 151445)
(tkeller@kbkllp.com)
DAVID A. TAYLOR (Cal. Bar No. 247433)
(dtaylor@kbkllp.com)
DARA L. SILVEIRA (Cal. Bar No. 274923)
(dsilveira@kbkllp.com)
THOMAS B. RUPP (Cal. Bar No. 278041)
(trupp@kbkllp.com)
101 Montgomery Street, Suite 1950
San Francisco, California 94104
Telephone: (415) 496-6723

*Attorneys for Michael I. Goldberg, as Trustee of the LFM Plan Recovery Trust*

**PACHULSKI STANG ZIEHL & JONES LLP**
Debra I. Grassgreen (Cal. Bar No. 169978)
(dgrassgreen@pszjlaw.com)
John D. Fiero (Cal. Bar No. 136557)
(jfiero@pszjlaw.com)
Jason H. Rosell (Cal. Bar No. 269126)
(jrosell@pszjlaw.com)
Brooke E. Wilson (Cal. Bar No. 354614)
(bwilson@pszjlaw.com)
One Sansome Street, 34th Floor, Suite 3430
San Francisco, California 94104-4436
Telephone: (415)-263-7000

*Attorneys for Michael I. Goldberg, as Trustee of the LFM Plan Recovery Trust*

KELLER BENVENUTTI KIM LLP
101 MONTGOMERY STREET, SUITE 1950
SAN FRANCISCO, CALIFORNIA 94104

**UNITED STATES BANKRUPTCY COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SANTA ROSA DIVISION**

| | |
|---|---|
| In re:<br><br>LEFEVER MATTSON,<br><br>Consolidated Debtor. | Case No. 24-10545 (HLB)<br><br>(Substantively Consolidated)<br><br>Chapter 11<br><br>**DECLARATION OF DARA L. SILVEIRA IN SUPPORT OF *EX PARTE* APPLICATION FOR ENTRY OF INTERIM ORDER EXTENDING DEADLINE FOR TRUSTEE OF THE LFM PLAN RECOVERY TRUST TO RESOLVE PROOFS OF INTEREST AND OBJECT TO CLAIMS PENDING NEXT AVAILABLE HEARING DATE**<br><br>[No hearing requested] |

I, Dara L. Silveira, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and before this Court. I am a partner at Keller Benvenutti Kim LLP ("KBK"), counsel to Michael I. Goldberg, as Trustee (the "Trustee") of the LFM Plan Recovery Trust. I make this declaration in support of the *Ex Parte Application for Entry of Interim Order Extending Deadline for Trustee of the LFM Plan Recovery Trust to Resolve Proofs of Interest and Object to Claims Pending Next Available Hearing Date* (the "Application"),[1] filed concurrently herewith. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath. I am authorized by the Trustee to make this Declaration.

2. When KBK began drafting the Extension Motion several weeks ago, the Court had a calendar on November 5, 2026 (the "November 5 Calendar"). Subsequently, however, the Court closed the November 5 Calendar to new matters and vacated other hearings the Trustee had noticed for that date.

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct. Executed this sixteenth day of October, 2026, in San Francisco, California.

*/s/ Dara L. Silveira*
Dara L. Silveira

[1] Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Application.

KELLER BENVENUTTI KIM LLP
101 MONTGOMERY STREET, SUITE 1950
SAN FRANCISCO, CALIFORNIA 94104