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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 DARA L. SILVEIRA REGARDING ORDER GRANTING IN PART MOTION FOR RECONSIDERATION AND VACATING HEARING**

KELLER BENVENUTTI KIM LLP
101 MONTGOMERY STREET, SUITE 1950
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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, counsel to Michael I. Goldberg, as Trustee (the "Trustee") of the LFM Plan Recovery Trust. I make this declaration in response to the *Order Granting in Part Motion for Reconsideration and Vacating Hearing* [Docket No. 4585] (the "Order"), entered on October 2, 2026, and in further support of the *Motion for (I) Reconsideration of Order Regarding Discovery Dispute [Dkt. No. 4559] and (II) Entry of an Order Setting a Status Conference on the Saifi Claim* [Docket No. 4568], filed on September 15, 2026. 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. Mr. Saifi has not complied with the Order because he has not produced any nonprivileged and as-yet-unproduced material in his possession or control that is responsive to the Trustee's Requests for Production. I have not received any additional documents since I suspended Mr. Saifi's deposition on August 20, 2026, nor have I heard from Mr. Saifi's counsel since then.

3. Concurrently herewith, I have caused to be uploaded an order sustaining the *Objection to Claims of Siroos Saifi (Proof of Claim No. 68)* [Docket No. 3081].

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 ninth day of November, 2026, in San Francisco, California.

/s/ Dara L. Silveira
Dara L. Silveira

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