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*Attorneys for the Debtors and  
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION**

In re:  
LEFEVER MATTSON, a California  
corporation, *et al.*,<sup>1</sup>  
Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**DECLARATION OF XIANGWEN LU IN  
SUPPORT OF ADEQUATE ASSURANCE  
OF FUTURE PERFORMANCE WITH  
RESPECT TO THE ASSUMPTION AND  
ASSIGNMENT OF EXECUTORY  
LEASES AND/OR UNEXPIRED  
CONTRACTS IN CONNECTION WITH  
THE SALE OF 1189 DANA DRIVE,  
FAIRFIELD, CA 94533**

[No Hearing Requested]

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. 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://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.



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1 I, Xiangwen Lu, declare as follows, pursuant to 28 U.S.C. § 1746:

2 1. I submit this declaration (the “Declaration”) with respect to the assumption and  
3 assignment of executory leases and/or unexpired contracts (the “Agreements”) in connection with  
4 the sale of the real property located at 1189 Dana Drive, Fairfield, California 94533, commonly  
5 known as the Tradewinds Apartments (the “Subject Property”), from the above-captioned debtors  
6 and debtors-in-possession (collectively, the “Debtors”) pursuant to the Purchase and Sale  
7 Agreement dated November 13, 2025 (the “Purchase Agreement”) attached as Exhibit A to  
8 Exhibit 1 to the *Notice of Sale of 1189 Dana Drive, Fairfield, CA 94533* filed concurrently  
9 herewith.

10 2. Except as otherwise indicated herein, the facts set forth in this Declaration are based  
11 upon my personal knowledge, my review of relevant documents, information provided to us, or  
12 my opinion based upon experience, knowledge, and information concerning our finances. If called  
13 upon to testify, I would testify to the facts set forth in this Declaration.

14 3. Guangyu Zhang, Margaret Lu, and I (jointly, the “Buyers”) are the purchasers of  
15 the Subject Property.

16 4. The Buyers are longtime residents of California and are experienced owners of  
17 investment properties throughout the Sacramento and Northern California market. We are familiar  
18 with the day-to-day operations of multifamily and investment properties, currently owning an  
19 extensive portfolio of rental housing. We have multiple handymen and contractors to assist in  
20 maintenance and active management that will facilitate running the day-to-day operations.

21 5. We are experienced operators who have sufficient reserves and cash flow from  
22 other assets to acquire 1189 Dana Drive, Fairfield, California, and to smoothly run the day-to-day  
23 operations. We have sufficient equity for the down payment and are comfortable with the  
24 acquisition.

25 6. I have reviewed the financial information for the Subject Property provided by the  
26 Debtors, and the Buyers are capable of meeting the financial obligations of the Agreements.

27 7. The Buyers are willing and able to perform my obligations under the Purchase  
28 Agreement and the assigned Agreements.

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

Dated: 12/16/2025 | 11:32 AM PST

DocuSigned by:  
/s/ Xiangwen Lu  
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Xiangwen Lu