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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.

In re

KS MATTSON PARTNERS, LP,

Debtor.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**DECLARATION OF KABUL SINGH IN  
 SUPPORT OF ADEQUATE ASSURANCE  
 OF FUTURE PERFORMANCE BY  
 HIGHLAND PACIFIC CAPITAL, LLC  
 WITH RESPECT TO THE ASSUMPTION  
 AND ASSIGNMENT OF EXECUTORY  
 LEASES AND/OR UNEXPIRED  
 CONTRACTS IN CONNECTION WITH  
 THE SALE OF 23570 ARNOLD DRIVE,  
 AND 72, 100 AND 150 WAGNER ROAD,  
 SONOMA, CA 95476**

[No Hearing Requested]

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. 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>

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

2 1. I submit this declaration (the “Declaration”) in support of Highland Pacific Capital,  
3 LLC, a California limited liability company (the “Buyer”), with respect to the assumption and  
4 assignment of executory leases and/or unexpired contracts (the “Agreements”) in connection with  
5 the sale of the real property located at 23570 Arnold Drive, and 72, 100, and 150 Wagner Road,  
6 Sonoma, California 95476, commonly known as Cornerstone Sonoma and the Barn at Harrow  
7 Cellars (the “Subject Property”), from the above-captioned debtors and debtors-in-possession  
8 (collectively, the “Debtors”)<sup>2</sup> pursuant to the Purchase and Sale Agreement dated December 5,  
9 2025 (the “Purchase Agreement”) attached as Exhibit A to Exhibit 1 to the *Notice of Sale of 23570*  
10 *Arnold Drive, and 72, 100, and 150 Wagner Road, Sonoma, CA 95476*, filed concurrently  
11 herewith.

12 2. I am knowledgeable and familiar with the Buyer’s business and financial affairs. I  
13 am authorized to submit this Declaration on behalf of the Buyer. Except as otherwise indicated  
14 herein, the facts set forth in this Declaration are based upon my personal knowledge, my review  
15 of relevant documents, information provided to me by the Buyer or its advisors, or my opinion  
16 based upon experience, knowledge, and information concerning the Buyer’s finances. If called  
17 upon to testify, I would testify to the facts set forth in this Declaration.

18 3. I am the principal of the Buyer.

19 4. The Buyers are a family-run operation with extensive experience owning and  
20 operating successful businesses in California and Nevada. Their portfolio encompasses 21  
21 business operations and investment properties—including varied commercial properties, and  
22 various residential and land holdings—with a conservative aggregate value of approximately \$40  
23 million for real estate and business operations achieving approximately \$4 million in EBITDA a  
24 year giving them. The Buyers maintain approximately \$30 million in liquid cash reserves. They  
25 directly employ over 200 individuals, while also engaging dozens of consultants and contractors,  
26 and remain deeply committed to an employee-centered culture that prioritizes the well-being of  
27

28 <sup>2</sup> Unless otherwise indicated, “Debtors” as used herein excludes KSMP.

1 their workers and their families.

2 5. The Buyer is working with the Debtors to transition the current operations smoothly  
3 and is committed to retaining the current event planning and catering staff as part of that process.

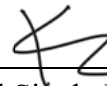
4 6. The Highland Pacific Capital companies were founded over 20 years ago and have  
5 been continuously owned and operated by the Singh Family since its founding and have the  
6 financial ability to own and manage the property.

7 7. Accordingly, the Buyer has demonstrated the willingness and ability to perform its  
8 obligations under the Purchase Agreement and the assigned Agreements.

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

11  
12 Dated: 12-17-2025

/s/



Kabul Singh, Principal  
Highland Pacific Capital, LLC