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*Proposed Counsel for the Debtor  
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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

In re:  
  
THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation sole,  
  
Debtor.

Case No. 23-40523 WJL  
  
Chapter 11  
  
**NOTICE OF HEARING ON SHORTENED  
TIME FOR FIRST DAY MOTIONS**  
  
Judge: Hon. William J. Lafferty  
  
Date: May 9, 2023  
Time: 1:30 p.m.  
Place: United States Bankruptcy Court  
1300 Clay Street  
Courtroom 220  
Oakland, CA 94612

[In person or via Zoom]

**PLEASE TAKE NOTICE THAT** a hearing will be held on **Tuesday, May 9, 2023, at 1:30 p.m.** (the "First Day Hearing"), and will take place at the United States Bankruptcy Court, 1300 Clay Street, Oakland, California, before the Honorable William J. Lafferty, United States Bankruptcy Judge, to consider the following motions (the "First Day Motions") filed by The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Bankruptcy Case"):

1. *Debtor's Motion for Interim and Final Orders Authorizing the Debtor to (I) (A) Continue Existing Cash Management System. (B) Honor Certain Prepetition*



1 *Obligations Related to the Use Thereof, (C) Continue Intercompany Arrangements,*  
2 *(D) Maintain Existing Bank Accounts and Business Forms, and (E) Continue Use*  
3 *of Existing Credit Card Accounts; and (II) Waive Certain Requirements of 11*  
4 *U.S.C. § 345(b) (the “Cash Management Motion”);*

5 2. *Debtor’s Motion for Interim and Final Orders Authorizing the Debtor to (I) Pay*  
6 *Prepetition Employee Wages, Salaries, Benefits and Other Related Items, (II)*  
7 *Reimburse Prepetition Employee Business Expenses, (III) Continue Employee*  
8 *Benefit Programs, and (IV) Pay All Costs and Expenses Incident to the Foregoing*  
9 *(the “Wages and Benefits Motion”);*

10 3. *Debtor’s Motion for Interim and Final Orders Authorizing the Debtor to (I)*  
11 *Continue Existing Insurance Coverage and Satisfy Obligations Related Thereto,*  
12 *and (II) Renew, Amend, Supplement, Extend or Purchase Insurance Policies in the*  
13 *Ordinary Course of Business (the “Insurance Motion”);*

14 4. *Debtor’s Motion for an Order Establishing Adequate Assurance Procedures With*  
15 *Respect to the Debtor’s Utility Providers (the “Utilities Motion”);*

16 5. *Debtor’s Motion For Interim and Final Orders Authorizing the Debtor to (I) Pay*  
17 *Certain Prepetition Invoices For Abuse Survivors’ Assistance and Safe*  
18 *Environment Programs, and (II) Continue its Prepetition Practice of Paying For*  
19 *Abuse Survivors’ Assistance and Safe Environment Programs (the “Abuse Survivor*  
20 *Assistance Motion”);*

21 6. *Debtor’s Motion for an Order Authorizing and Approving Special Noticing and*  
22 *Confidentiality Procedures (the “Notice and Confidentiality Motion”); and*

23 7. *Debtor’s Application for Entry of an Order (I) Authorizing and Approving the*  
24 *Appointment of Kurtzman Carson Consultants LLC as Claims and Noticing Agent,*  
25 *and (II) Granting Related Relief (the “KCC Retention Application”).*

26 **PLEASE TAKE FURTHER NOTICE THAT** the First Day Hearing will be held in person in  
27 the courtroom, provided that (1) counsel, parties, and other interested parties may attend the hearing in  
28 person or by Zoom; (2) additional information is available on Judge Lafferty’s Procedures page on the  
Court’s website, which is <http://www.canb.uscourts.gov>; and (3) information on attending the hearing by  
Zoom will be provided on Judge Lafferty’s calendar, posted on the Court’s website prior to the hearing  
date. All parties should review the presiding judge’s Practices and Procedures for In-Person Hearings,  
found on the Court’s website.

**PLEASE TAKE FURTHER NOTICE THAT** each First Day Motion is based upon this Notice;  
such First Day Motion and the memorandum of points and authorities set forth therein; the *Declaration*  
*of Charles Moore, Managing Director of Alvarez & Marsal North America, LLC, Proposed Restructuring*  
*Advisor to the Roman Catholic Bishop of Oakland, in Support of Chapter 11 Petition and First Day*  
*Pleadings* (the “First Day Declaration”); the papers on file in this bankruptcy case; and on such arguments  
or evidence as may be presented at the hearing. Copies of the First Day Motions, the First Day  
Declaration, and all pleadings and papers filed in this Bankruptcy Case can be obtained from the website  
maintained by the Debtor’s proposed claims and noticing agent, Kurtzman Carson Consultants LLC, at  
<https://www.kccllc.net/rcbo>. You may also access these documents through the Court’s Pacer electronic  
docket, with a subscription. The web page for the Bankruptcy Court is <http://www.canb.uscourts.gov>

1           **PLEASE TAKE FURTHER NOTICE THAT** the relief request in the First Day Motions is  
2 briefly summarized as follows:

3           Cash Management Motion. Through the Cash Management Motion, the Debtor seeks authority to  
4 continue operating its existing cash management system as described therein, including the maintenance  
5 of existing bank accounts at the Debtor's banks, honoring certain related prepetition obligations,  
6 continuance of certain intercompany arrangements, and related relief. The relief sought in the Cash  
7 Management Motion is critical to avoid harmful disruptions in the Debtor's operations and access to cash.

8           Wages and Benefits Motion. Through the Wages Motion, the Debtor seeks authority to honor and  
9 pay prepetition employee compensation and unreimbursed prepetition business expenses of employees,  
10 to maintain employee benefit programs including insurance and workers compensation and pay  
11 prepetition expenses related thereto, to continue to act as collection and payment agent for certain  
12 employee programs shared with related non-debtor employers, and related relief. The relief sought in the  
13 Wages and Benefits Motion is essential to avoid interruption in the payment of wages and provision of  
14 benefits to the Debtor's employees.

15           Insurance Motion. Through the Insurance Motion, the Debtor seeks authorization necessary to  
16 maintain its existing insurance program, including payment of premiums and all obligations related to its  
17 insurance policies, to continue to honor its obligations under insurance premium financing agreements, to  
18 renew, extend, or enter into new insurance policies in the ordinary course of business, to pay its regular  
19 brokerage and other administrative fees in connection with its insurance program, and related relief. The  
20 relief sought in the Insurance Motion is essential to ensure uninterrupted insurance coverage while the  
21 Debtor remains in chapter 11 bankruptcy.

22           Utilities Motion. Through the Utilities Motion, the Debtor seeks to prohibit utility providers from  
23 altering, refusing, or discontinuing service to the Debtor, to establish procedures for providing adequate  
24 assurance to utility providers and for and resolving objections, if any, to the proposed adequate assurance,  
25 and related relief. The relief sought in the Utilities Motion is essential to avoid interruption in utility  
26 services to the Debtor, and to provide standard, consistent procedures for the provision of adequate  
27 assurance.

28           Abuse Survivor Assistance Motion. Through the Abuse Survivor Assistance Motion, the Debtor  
seeks authorization to pay certain prepetition invoices in connection with the Debtor's programs to support  
victim-survivors of clergy sexual abuse and to provide a safe environment for children and other  
vulnerable persons, and to continue to pay expenses relating to such programs in the ordinary course of  
its business. This primarily includes (i) the expenses counseling, treatment, and programming for those  
who have been credibly found to be the victims of abuse by members of the clergy, and (ii) expenses  
attendant to the Debtor's mandatory training and background check programs that provide a safe  
environment for parishioners and visitors to diocesan facilities. The relief sought in the Abuse Survivors  
Assistance Motion is essential to the Debtor's ongoing obligations and to its moral and ethical  
responsibility to support abuse victims in the Bay Area.

Notice and Confidentiality Motion. Through the Notice and Confidentiality Motion, the Debtor  
seeks authorization to (i) allowing the Debtor to file schedules, statements of financial affairs, creditor  
matrix, motions, pleadings, and any other entry into the record under seal or redacted to the extent they  
contain (a) non-public names of abuse claimants, potential abuse claimants, or those accused of  
committing or covering up abuse, or (b) the private contact information of the Debtor's current or former

1 employees, (ii) allowing other parties-in-interest in this Bankruptcy Case to do the same, and (iii) limiting  
2 notice to a specific list of recipients on all but a few discrete matters identified in the Notice and  
3 Confidentiality Motion. The relief sought in the Notice and Confidentiality Motion is essential to preserve  
4 the anonymity of those who have accused clergy, or those who have been accused, of abuse, to protect the  
5 privacy and to prevent identity theft and harassment of those individuals and of other individuals involved  
6 in this Bankruptcy Case, and to allow for the efficient administration of this Bankruptcy Case.

7 KCC Retention Application. Through the Claims and Noticing Agent Motion, the Debtor seeks  
8 approval of the retention and appointment of Kurtzman Carson Consultants LLC as claims and noticing  
9 agent in this Bankruptcy Case. Given the size and complexity of the case, the number of creditors, and  
10 the critical confidentiality issues related to certain creditors, a claims and noticing agent is necessary to  
11 the efficient administration of this case.

12 **PLEASE TAKE FURTHER NOTICE THAT** the foregoing is only a brief summary of the relief  
13 requested in each First Day Motion, and does not fully describe the relief requested, the basis thereof, or  
14 the evidence in support. All parties in interest are encouraged to review the First Day Motions, the First  
15 Day Declaration, and all other documents filed in connection therewith.

16 **PLEASE TAKE FURTHER NOTICE THAT** opposition, if any, to the relief sought in the First  
17 Day Motions may be in writing, filed with the Bankruptcy Court, or may be brought at the First Day  
18 Hearing (filing a written opposition in advance of the hearing is not required).

19 DATED: May 8, 2023

**FOLEY & LARDNER LLP**

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Ann Marie Uetz  
Matthew D. Lee

/s/ Thomas F. Carlucci

THOMAS F. CARLUCCI

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