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8 *Special Insurance Counsel for*  
9 *the Debtor*

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11  
12 **UNITED STATES BANKRUPTCY COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **OAKLAND DIVISION**

15 In re:  
16  
17 THE ROMAN CATHOLIC BISHOP OF  
18 OAKLAND, a California corporation sole,  
19  
20 Debtor.

21 CHAPTER 11  
22 CASE No: 23-40523 WJL  
23 HON. WILLIAM J. LAFFERTY

24 **CERTIFICATE OF NO OBJECTION TO**  
25 **ELEVENTH MONTHLY FEE**  
26 **STATEMENT OF BREALL & BREALL,**  
27 **LLP, AS SPECIAL INSURANCE COUNSEL**  
28 **TO THE DEBTOR, FOR ALLOWANCE**  
**AND PAYMENT OF COMPENSATION**  
**AND REIMBURSEMENT OF EXPENSES**  
**FOR THE PERIOD OF JULY 1, 2024**  
**THROUGH JULY 31, 2024**

29 THE ROMAN CATHOLIC BISHOP OF  
30 OAKLAND,  
31  
32 PLAINTIFF,  
33  
34 v.  
35 AMERICAN HOME ASSURANCE CO., a  
36 New York corporation; LEXINGTON  
INSURANCE CO., a Delaware corporation,  
37  
38 DEFENDANTS.

ADVERSARY CASE No. 23-04037



1 On August 29, 2024, Breall & Breall LLP (the “Applicant”), as special insurance counsel to The  
2 Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in  
3 possession (the “Debtor” or “RCBO”) in the above-captioned chapter 11 bankruptcy case (the “Chapter  
4 11 Case” or the “Bankruptcy Case”), filed its Eleventh Monthly Fee Statement of Breall & Breall LLP,  
5 as Special Insurance Counsel to the Debtor, for Allowance and Payment of Compensation and  
6 Reimbursement of Expenses for the Period of July 1, 2024 through July 31, 2024 [Docket No. 1314]  
7 (the “Monthly Fee Statement”), pursuant to the Order Authorizing Procedures for Interim Compensation  
8 and Reimbursement of Expenses of Professionals [Docket No. 170] (the “Compensation Procedures  
9 Order”).

10 On August 29, 2024, the Monthly Fee Statement was served via email pursuant to the terms of  
11 the Compensation Procedures Order, on the Notice Parties (as defined therein).

12 The deadline for each notice party to file any objection to the Monthly Fee Statement was  
13 September 9, 2024, under the Compensation Procedures Order. No objections to the Monthly Fee  
14 Statement have been filed with the Court or received by the Applicant as of the date hereof. Pursuant to  
15 the Compensation Procedures Order, the Debtor is authorized to pay the Applicant eighty percent (80%)  
16 of the fees and one hundred percent (100%) of the expenses requested in the Monthly Fee Statement  
17 without the need of a further order of the Court.

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1 **DECLARATION OF NO OBJECTION**

2 The undersigned hereby declares as follows:

- 3 1. I am an attorney with the firm of Breall & Breall LLP, special insurance counsel to the Debtor in  
4 this Chapter 11 Case.
- 5 2. I certify that I have reviewed the Court's docket in this Chapter 11 Case and no objection or  
6 response to the Monthly Fee Statement has been filed, and that no objection or response has been  
7 received by Applicant.
- 8 3. This declaration was executed in San Francisco, California

9  
10 DATED: SEPTEMBER 10, 2024

**BREALL & BREALL, LLP**

11 By: /s/ Joseph M. Breall  
12 Joseph M. Breall  
13 *Special Insurance Counsel for Debtor,*  
14 *The Roman Catholic Bishop of Oakland*