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*Counsel for the Debtor
and Debtor in Possession***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

Chapter 11

**BANKRUPTCY LOCAL RULE 9014-1
CERTIFICATE OF NO OBJECTION
REGARDING DOCKET NO. 1689:
DEBTOR'S FOURTH MOTION FOR
ENTRY OF AN ORDER, PURSUANT TO
BANKRUPTCY RULES 9006 AND 9027,
ENLARGING THE PERIOD WITHIN
WHICH THE DEBTOR MAY REMOVE
ACTIONS PURSUANT TO 28 U.S.C. § 1452**

Judge: Hon. William J. Lafferty

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 "Chapter 11 Case" or the "Bankruptcy Case"), hereby files this certificate of no objection and requests entry of an order granting *Debtor's Fourth Motion for Entry of an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Enlarging the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452*

[Docket No. 1689] (the “Motion”). On January 31, 2025, the Debtor filed the Motion, together with the Declaration of Attila Bardos in Support of Debtor’s Fourth Motion for Entry of an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Enlarging the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 [Docket No. 1690] (the “Bardos Declaration”), and the Notice of Hearing on Debtor’s Fourth Motion for Entry of an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Enlarging the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 [Docket No. 1691] (the “Notice”). On January 31, 2025, the Motion, the Bardos Declaration, and the Notice were served on the Core Service List, as set forth in the Certificate of Service filed on February 4, 2025 [Docket No. 1699], in compliance with the Final Order Authorizing and Approving Special Noticing and Confidentiality Procedures [Docket No. 292].

The only response filed to the Motion was The Official Committee of Unsecured Creditors’ Response and Reservation of Rights to Debtor’s Fourth Motion for Entry of an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Enlarging the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 [Docket No. 1775] (the “Committee Response”) filed by the Official Committee of Unsecured Creditors (the “Committee”), which Committee Response reflects that the Committee does not oppose the extension of the removal deadline requested by the Motion, but reserves all rights with regard to further extensions. As reflected in the proposed order submitted in conjunction with this Certificate of No Objection (the “Proposed Order”), the Committee has approved the Proposed Order as to form.

As of this date, the undersigned has not received any answer, objection, or other responsive pleading to the Motion, other than the Committee Response and has reviewed the Court’s record and no other answer, objection, or other responsive pleading to the Motion appears. Pursuant to the Notice and B.L.R. 9014-1(c), objections to the Motion were to be filed and served no later than February 25, 2025, pursuant to B.L.R. 9014-1(c), and no informal extension of time to object has been provided.

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1 It is hereby respectfully requested that the Proposed Order uploaded concurrently herewith be
2 entered by the Court, which is in substantially the form attached as Exhibit A to the Motion, except as
3 modified by agreement with the Committee.

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5 DATED: March 3, 2025

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10 /s/ Shane J. Moses

11 SHANE J. MOSES

12 *Counsel for the Debtor*
13 *and Debtor in Possession*