1 2 3 4 5 6 7 8	Shane J. Moses (CA Bar No. 250533) Tel: (415) 438-6404; smoses@foley.com Ann Marie Uetz (admitted pro hac vice) Tel: (313) 234-7114; auetz@foley.com Matthew D. Lee (admitted pro hac vice) Tel: (608) 258-4203; mdlee@foley.com Geoffrey S. Goodman (admitted pro hac vice) Tel: (312) 832-4515; ggoodman@foley.com Mark C. Moore (admitted pro hac vice) Tel: (214) 999-4150; mmoore@foley.com 555 California Street, Suite 1700	
9 10	and Debtor in Possession	
10	UNITED STATES BANKRUPTCY COURT	
11	NORTHERN DISTRICT OF CALIFORNIA	
12	OAKLAND DIVISION	
14	In re:	Case No. 23-40523 WJL
15	THE ROMAN CATHOLIC BISHOP OF	Chapter 11
16	OAKLAND, a California corporation sole, Debtor.	DECLARATION OF ATTILA BARDOS IN
17	Debtor.	SUPPORT OF DEBTOR'S APPLICATION FOR ORDER AUTHORIZING
18 19		EMPLOYMENT OF HILCO REAL ESTATE, LLC AS REAL ESTATE CONSULTANT PURSUANT TO
20		11 U.S.C. § 327
21		Judge: Hon. William J. Lafferty
22		[No Hearing Required]
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	Case: 23-40523 Doc# 1810 Filed: 03/07/2 4898-2545-2829.1 3	25 Entered: 03/( 234052325030700000000004

I, Attila Bardos, hereby declare as follows:

I am the chief financial officer of the Roman Catholic Bishop of Oakland (the "<u>Debtor</u>").
 I make this declaration in support of the *Debtor's Application for Order Authorizing Employment of Hilco Real Estate, LLC as Real Estate Consultant Pursuant To 11 U.S.C. § 327* (the "<u>Application</u>") filed
 concurrently herewith.<sup>1</sup> I have reviewed the Application and approve the contents thereof.

2. I am familiar with the Debtor's day-to-day operations, financial affairs, and books and
records. Except as otherwise noted, all facts set forth in this Declaration are based upon my personal
knowledge or upon my review of records created or maintained by the Debtor in the ordinary course of
business. If called upon to testify, I could and would testify competently to the facts set forth herein.

3. The Debtor has retained Hilco to provide real estate valuation services as set forth in the
Application and the Engagement Agreement between the Debtor and Hilco. The real estate valuation
services to be provided by Hilco are critical in connection with the Debtor's reorganization, and its Plan
and Disclosure Statement. The scope of and need for Hilco's retention are as further described in the
Application.

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I believe Hilco is well-qualified to provide the services described in the Application.

5. In light of the circumstances of the Chapter 11 Case, and the essential nature of services
contemplated in the Application, the Debtor respectfully submits that employing and retaining Hilco, is
necessary and in the best interests of the Debtor's estate and all parties in interest. I believe that the terms
and conditions of Hilco's retention, as set forth in the Application, are reasonable.

6. The following is provided in response to the request for additional information set forth in
Paragraph D.1. of the U.S. Trustee's Guidelines for Reviewing Applications for Compensation and
Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases,
effective November 1, 2013 (the "<u>Revised UST Guidelines</u>"):

7. Hilco's retention was negotiated at arm's length between the Debtor and Hilco, and I am informed that it is based on Hilco's standard rates and employment terms for real estate valuation work.

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DECL. OF A. BARDOS ISO HILCO EMPLOYMENT APPLICATION

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<sup>&</sup>lt;sup>1</sup> Capitalized terms used herein but not otherwise defined herein shall have the meanings ascribed to them in the Application.

I am satisfied that the billing rates and terms for Hilco's retention by the Debtor are comparable to Hilco's
 non-bankruptcy rates and terms.

## 8. The Debtor did not interview any other firms for this work, as, based on the experience of its counsel, the Debtor determined that Hilco was best situated to provide the extraordinary services of valuating the Debtor's entire real estate portfolio within the time frame required to avoid delay to approval of the Debtor's Disclosure Statement.

9. As the Debtor's CFO, I will supervise, manage, review, and approve Hilco's bills,
consistent with my review and approval of all professionals employed by the Debtor. To the extent the
Debtor requests that Hilco perform additional work beyond the initial valuation of the Debtor's real
property, I will supervise and approve budgeting for any such additional work.

11 10. Based on the forgoing, I believe the relief sought in the Application will be in the best
12 interests of the Debtor, the estate, and all the creditors and other parties in interest.

I declare under penalty of perjury under the laws of the United States of America the foregoing is
true and correct to the best of my information, knowledge, and belief.

Executed on March 7, 2025, at Oakland, California.

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<u>/s/ Attila Bardos</u> Attila Bardos