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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

**AMENDED AND RESTATED  
STIPULATION TO ADD ROMAN  
CATHOLIC WELFARE CORPORATION AS  
AN AUTHORIZED PARTY UNDER BAR  
DATE ORDER CONFIDENTIALITY  
PROTOCOL**

1 The Roman Catholic Bishop of Oakland (the “**Debtor**”); the Official Committee of Unsecured  
2 Creditors (the “**Committee**”); and the Roman Catholic Welfare Corporation of Oakland (“**RCWC**,”  
3 together with the Debtor and the Committee, the “**Parties**”), by and through their undersigned counsel,  
4 stipulate as follows:

5 **WHEREAS** the Parties previously entered into the *Stipulation to Add Roman Catholic Welfare*  
6 *Corporation as an Authorized Party Under Bar Date Order Confidentiality Protocol* (Dkt. No. 1806)  
7 (the “**Prior Stipulation**”).

8 **WHEREAS** the Prior Stipulation was approved by the Court on March 10, 2025 (Dkt. No. 1819  
9 (the “**Prior Stipulation Order**”).

10 **WHEREAS** this Stipulation amends and restates the Prior Stipulation. The Prior Stipulation and  
11 Prior Order shall be deemed withdrawn and of no force and effect upon the filing of this Stipulation.

12 **WHEREAS** on July 25, 2023, this Court issued the *Order Establishing Deadlines for Filing*  
13 *Proofs of Claim and Approving the Form and Manner of Notice Thereof* (the “**Bar Date Order**”),<sup>1</sup>  
14 which, *inter alia*, identified certain “Authorized Parties” who may receive copies of Official Proof of  
15 Claim Forms and/or Supplements filed by, or on behalf of, Sexual Abuse Claimants regarding Sexual  
16 Abuse Claims (the “**Sexual Abuse Proofs of Claim**”), provided that, *inter alia*, each Authorized Party  
17 execute a Confidentiality Agreement (the “**Bar Date Confidentiality Agreement**”). Dkt. Nos. 293 ¶  
18 14(iii).

19 **WHEREAS** on January 25, 2024, this Court entered the *Order Granting Moving Insurers’*  
20 *Motion For Entry of an Order Permitting Insurer Experts and/or Consultants To Have Access To Sexual*  
21 *Abuse Proofs of Claims and Supplements*, which modified the Bar Date Order’s definition of  
22 “Authorized Parties” to include experts and consultants of certain insurers (“**Experts**”), and entitled  
23 such Experts to access and review Sexual Abuse Proofs of Claim, provided that certain personally  
24 identifiable information on the Sexual Abuse Proofs of Claim was redacted. Dkt. No. 817 ¶¶ 2-3.

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26  
27 <sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Bar Date Order.

1           **WHEREAS** on October 21, 2024, this Court entered the *Stipulation to Permit Experts and*  
2 *Consultants to Access Unredacted Proofs of Claim*, which further modified the Bar Date Order’s  
3 definition of “Authorized Parties” to provide Experts with access to unredacted copies of the Sexual  
4 Abuse Proofs of Claim. Dkt. No. 1417 ¶¶ 1-2.

5           **WHEREAS** all Parties agree that RCWC should be permitted access to all Official Proof of  
6 Claim Forms and/or Supplements, including Sexual Abuse Proofs of Claim that may implicate RCWC,  
7 to help facilitate ongoing mediation between and among the Parties.

8           **NOW, THEREFORE**, in consideration of the foregoing, the Parties hereto, by and through their  
9 respective attorneys of record, hereby agree and stipulate as follows:

10           1. Paragraph 14(iii) of the Bar Date Order, defining “Authorized Parties,” shall be modified  
11 as indicated below, with new language in blue and stricken language in red, to state:

12                           ...

13                   (b) Counsel to the Debtor, counsel for RCWC, and counsel for the  
14 Committee retained pursuant to an order of this Court, including any  
15 experts retained by or on behalf of the Debtor and the Committee  
under an order of this Court;

16                           ...

17                   (l) Counsel of record to any Authorized Party upon execution of a  
18 Confidentiality Agreement by such counsel; ~~and~~

19                   (m) The Office of the United States Trustee; ~~and~~

20                   (n) RCWC, and such other current or former employees of the RCWC  
21 who are necessary to assist RCWC in verifying the facts contained  
22 in the Official Proof of Claim Form and/or the Supplement filed by,  
23 or on behalf of a Sexual Abuse Claimant; provided, however, that if  
24 RCWC determines that the assistance of the alleged abuser is  
25 necessary to verify the facts contained in the Official Proof of Claim  
26 Form and/or the Supplement filed by, or on behalf of a Sexual  
27 Abuse Claimant, RCWC shall redact and not otherwise share the  
28 Sexual Abuse Claimant’s address or telephone number or any other  
personally identifiable information than is otherwise necessary to  
confirm the facts contained in the Official Proof of Claim Form  
and/or the Supplement. Notwithstanding the foregoing, or anything  
herein to the contrary, RCWC may only receive Official Proof of  
Claim Forms and/or the Supplement filed by, or on behalf of a

Sexual Abuse Claimant, who has named RCWC as a defendant in a state court action or who assert that a School owned, controlled, or operated by RCWC is liable (each, an “RCWC Claim”). Within 2 days of filing this Stipulation with the Court, the Debtor and the Committee shall meet and confer to create a list of RCWC Claims that RCWC may review without redaction. All other Official Proof of Claim Forms and/or the Supplement in unredacted form may only be reviewed by RCWC’s attorneys. If RCWC’s attorneys conclude, in good faith, that an Official Proof of Claim Form and/or the Supplement implicates RCWC, the Debtor may provide the unredacted Claim Form and/or the Supplement to RCWC upon 2 days written notice to the Debtor and the Committee. If the Debtor and the Committee do not agree that RCWC may review an unredacted Official Proof of Claim Form and/or the Supplement, they may seek relief from the Court to resolve the dispute.

2. All Parties and counsel may have access to the information contained in an Official Proof of Claim Form and/or Supplement filed by a Sexual Abuse Claimant only upon: (i) executing the Bar Date Confidentiality Agreement, subject to all terms, conditions and restrictions set forth therein and the Bar Date Order; and (ii) confirming in writing to counsel for the Debtor and the Committee that all relevant Parties and counsel have so executed;

3. Unless otherwise specifically modified herein, the Bar Date Order remains in full force and effect; and

4. In compliance with Section 14(iii)(j) of Bar Date Order, counsel for all claimants will be concurrently served by the Debtor with a copy of this Stipulation and the Proposed Order attached hereto as Exhibit A (the “**Proposed Order**”). The Parties request that entry of the Proposed Order not go effective for ten (10) business days, to provide claimants with an opportunity to object.

*[Remainder of page intentionally left blank]*

1 Dated: March 17, 2025

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By: /s/ Rebecca J. Winthrop  
Rebecca J. Winthrop

*Attorneys for Roman Catholic Welfare Corporation  
of Oakland*

# **EXHIBIT A**

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20 *Adventus*

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Case No. 23-40523 WJL

Chapter 11

**[PROPOSED] AMENDED ORDER TO ADD  
ROMAN CATHOLIC WELFARE  
CORPORATION AS AN AUTHORIZED  
PARTY UNDER BAR DATE ORDER  
CONFIDENTIALITY PROTOCOL**

The Court having reviewed the Parties' *Amended and Restated Stipulation to Add Roman Catholic Welfare Corporation as an Authorized Party Under Bar Date Order Confidentiality Protocol* (the "Stipulation"),<sup>1</sup> entered into between The Roman Catholic Bishop of Oakland (the "Debtor"); the Official Committee of Unsecured Creditors (the "Committee"); and the Roman Catholic Welfare Corporation of Oakland ("RCWC," together with the Debtor and the Committee, the "Parties"); and after due consideration and good cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Court's *Order to Add Roman Catholic Welfare Corporation as an Authorized Party Under Bar Date Order Confidentiality Protocol* (Dkt No. 1819) is amended as set forth herein.

2. Paragraph 14(iii) of the Bar Date Order, defining "Authorized Parties," shall be modified as indicated below, with new language in blue and stricken language in red, to state:

...

(b) Counsel to the Debtor, counsel for RCWC, and counsel for the Committee retained pursuant to an order of this Court, including any experts retained by or on behalf of the Debtor and the Committee under an order of this Court;

...

(l) Counsel of record to any Authorized Party upon execution of a Confidentiality Agreement by such counsel; ~~and~~

(m) The Office of the United States Trustee; ~~and~~

(n) RCWC, and such other current or former employees of the RCWC who are necessary to assist RCWC in verifying the facts contained in the Official Proof of Claim Form and/or the Supplement filed by, or on behalf of a Sexual Abuse Claimant; provided, however, that if RCWC determines that the assistance of the alleged abuser is necessary to verify the facts contained in the Official Proof of Claim Form and/or the Supplement filed by, or on behalf of a Sexual Abuse Claimant, RCWC shall redact and not otherwise share the Sexual Abuse Claimant's address or telephone number or any other

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Stipulation.



1 personally identifiable information than is otherwise necessary to  
2 confirm the facts contained in the Official Proof of Claim Form  
3 and/or the Supplement. Notwithstanding the foregoing, or anything  
4 herein to the contrary, RCWC may only receive Official Proof of  
5 Claim Forms and/or the Supplement filed by, or on behalf of a  
6 Sexual Abuse Claimant, who has named RCWC as a defendant in a  
7 state court action or who assert that a School owned, controlled, or  
8 operated by RCWC is liable (each, an “RCWC Claim”). Within 2  
9 days of filing this Stipulation with the Court, the Debtor and the  
10 Committee shall meet and confer to create a list of RCWC Claims  
11 that RCWC may review without redaction. All other Official Proof  
12 of Claim Forms and/or the Supplement in unredacted form may only  
be reviewed by RCWC’s attorneys. If RCWC’s attorneys conclude,  
in good faith, that an Official Proof of Claim Form and/or the  
Supplement implicates RCWC, the Debtor may provide the  
unredacted Claim Form and/or the Supplement to RCWC upon 2  
days written notice to the Debtor and the Committee. If the Debtor  
and the Committee do not agree that RCWC may review an  
unredacted Official Proof of Claim Form and/or the Supplement,  
they may seek relief from the Court to resolve the dispute.

13 3. All Parties and counsel may have access to the information contained in an Official Proof  
14 of Claim Form and/or Supplement filed by a Sexual Abuse Claimant only upon: (i) executing the Bar  
15 Date Confidentiality Agreement, subject to all terms, conditions and restrictions set forth therein and  
16 the Bar Date Order; and (ii) confirming in writing to counsel for the Debtor and the Committee that  
17 all relevant Parties and counsel have so executed;

18 4. Unless otherwise specifically modified herein, the Bar Date Order remains in full force  
19 and effect.

20 \*\*END OF ORDER\*\*  
21  
22  
23  
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**COURT SERVICE LIST**

All ECF Recipients.