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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

**NOTICE OF SUPPLEMENTAL
RETENTION OF ORDINARY COURSE
PROFESSIONAL DR. KURT MARTENS
PURSUANT TO ORDER (I) AUTHORIZING
THE RETENTION AND PAYMENT,
EFFECTIVE AS OF THE PETITION DATE,
OF PROFESSIONALS UTILIZED BY THE
DEBTOR IN THE ORDINARY COURSE OF
BUSINESS; AND (II) GRANTING RELATED
RELIEF**

Judge: Hon. William J. Lafferty

On July 20, 2023, this Court entered its *Order (I) Authorizing the Retention and Payment, Effective as of the Petition Date, of Professionals Utilized by the Debtor in the Ordinary Course of Business; and (II) Granting Related Relief* [Dkt. No. 263] (the "OCP Order"). Pursuant to paragraph 3(h) of the OCP Order, the Debtor hereby provides notice of its supplemental retention of an additional Ordinary Course Professional, Dr. Kurt Martens. The Debtor has selected D:



1 replacing its prior Canon law expert, Monsignor Ronny Jenkins, who had previously been approved as an
2 Ordinary Course Professional. Attached hereto is Dr. Martens' Declaration in support of his retention
3 **(Exhibit 1)** and his Retention Questionnaire **(Exhibit 2)**.

4 Pursuant to paragraph 3(e) of the OCP Order, the Notice Parties (as defined in that order) have 14
5 days to object to this Supplemental Retention.

6
7 DATED: April 11, 2025

FOLEY & LARDNER LLP

8 Thomas F. Carlucci
9 Shane J. Moses
10 Emil P. Khatchatourian
11 Ann Marie Uetz
12 Matthew D. Lee
13 Geoffrey S. Goodman
14 Mark C. Moore

/s/ Shane J. Moses

SHANE J. MOSES

*Counsel for the Debtor
and Debtor in Possession*

EXHIBIT 1

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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

Hon. William J. Lafferty

**DECLARATION AND DISCLOSURE
STATEMENT OF DR. KURT MARTENS**

10 I, Dr. Kurt Martens, hereby declare as follows:

11 1. I am a professor of canon law, located at The Catholic University of America in
12 Washington, DC.

13 2. The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and
14 debtor in possession (the “Debtor”) in the above-captioned chapter 11 case, has requested that I provide
15 canonical advice and services to the Debtor, and I have agreed to provide those services (the “Services”).

16 3. The Services include, but are not limited to, the following:
17 Explaining and interpreting the function and meaning of canon law related primarily to the functioning
18 of the bishop and the diocese of Oakland, canonical administrative and penal law, and temporal goods of
19 the Church.

20 4. I may have performed services in the past and may perform services in the future, in matters
21 unrelated to this chapter 11 case, for persons that are parties in interest in the Debtor’s chapter 11 case. I
22 am sometimes retained in cases, proceedings, and transactions involving many different parties, some of
23 whom may represent or be claimants or employees of the Debtor, or may represent or be other parties in
24 interest in this chapter 11 case. This includes serving as an expert for the Diocese of San Bernardino in
25 ongoing litigation. I do not perform services for any such person in connection with this chapter 11 case.
26 In addition, I do not have any relationship with any such person, such person’s attorneys, or such person’s
27 accountants that would be adverse to the Debtor or its estate with respect to the matters on which I am to
28 be retained.

1 5. I have not agreed to share or will share any portion of the compensation to be received
2 from the Debtor with any other person.

3 6. I, insofar as I have been able to ascertain, do not hold or represent any interest materially
4 adverse to the Debtor or its estate with respect to the matters on which I am to be retained.

5 7. As of the commencement of this chapter 11 case, the Debtor owed me \$0.00 for prepetition
6 services rendered to the Debtor.

7 8. I will conduct further inquiries regarding its retention by any creditors of the Debtor as
8 necessary, and upon conclusion of such inquiry, or at any time during the period of its employment, if I
9 should discover any facts bearing on the matters described herein, I will supplement the information
10 contained in this Declaration.

11 Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States
12 of America that the foregoing is true and correct, and that this Declaration and Disclosure Statement was
13 executed on April 9, 2025, at Washington, D.C.

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17 Dr. Kurt Martens
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EXHIBIT 2

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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

Chapter 11

Hon. William J. Lafferty

RETENTION QUESTIONNAIRE

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TO BE COMPLETED BY PROFESSIONALS EMPLOYED by The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11 case.

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All questions **must** be answered. Please use “none,” “not applicable,” or “N/A,” as appropriate. If more space is needed, please complete on a separate page and attach.

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1. Name and address of professional:

Dr. Kurt Martens

School of Canon Law, The Catholic University of America

Washington, DC 20064

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2. Date of retention: Q1 2025

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3. Type of services to be provided:

Canon law expert (expert on the internal law of the Catholic Church)

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4. Brief description of services to be provided:

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Explaining and interpreting the function and meaning of canon law related primarily to the functioning of the bishop and diocese of Oakland, canonical administrative and penal law, temporal goods of the Church.

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5. Arrangements for compensation (hourly, contingent, etc.):

Hourly: \$450/hour, not to exceed \$9,000 per month _____

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(a) Average hourly rate (if applicable): _____

1 (b) Estimated average monthly compensation based on prepetition retention (if company was
2 employed prepetition):

3 \$0.00

4 6. Prepetition claims against the Debtor held by the company:

5 Amount of claim: N/A

6 Date claim arose: _____

7 Nature of claim: _____

8 7. Prepetition claims against the Debtor held individually by any member, associate, or employee of
9 the company:

10 Name: N/A

11 Status: _____

12 Amount of claim: \$0.00

13 Date claim arose: _____

14 Nature of claim: _____

15
16 8. Disclose the nature and provide a brief description of any interest adverse to the Debtor or to the
17 estate for the matters on which the professional is to be employed:

18 N/A

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21 9. Name and title of individual completing this form:

22 Dr. Kurt Martens, Ordinary Professor of Canon Law, The Catholic University of America

23
24 Dated: April 9, 2025

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27 Signature of Individual Completing Form