

LOWENSTEIN SANDLER LLPJEFFREY D. PROL (admitted *pro hac vice*)jprol@lowenstein.comBRENT WEISENBERG (admitted *pro hac vice*)bweisenberg@lowenstein.comCOLLEEN M. RESTEL (admitted *pro hac vice*)crestel@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar No. 151445)

tkeller@kbkllp.com

JANE KIM (Cal. Bar No. 298192)

jkim@kbkllp.com

GABRIELLE L. ALBERT (Cal. Bar No. 190895)

galbert@kbkllp.com

425 Market Street, 26th Floor

San Francisco, California 94105

Telephone: (415) 496-6723

*Counsel for the Official Committee of Unsecured
Creditors***UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

Case No. 23-40523 WJL

Chapter 11

Judge: Hon. William J. Lafferty

*In re:*THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

**DECLARATION OF PAUL N.
SHIELDS IN SUPPORT OF
SUPPLEMENTAL APPLICATION TO
EMPLOY BERKELEY RESEARCH
GROUP, LLC AS CONSULTANT AND
EXPERT WITNESS**

I, Paul N. Shields, hereby declare pursuant to 28 U.S.C. §1746:

1. I am a Managing Director with Berkeley Research Group ("**BRG**"). My business address is Berkeley Research Group, 201 South Main Street Suite 450, Salt Lake City, Utah 84111.

I am authorized to make this Declaration on behalf of BRG.

1 2. I submit this Declaration pursuant to Rules 2014(a) and 2016(b) of the Federal
2 Rules of Bankruptcy Procedure in support of the *Supplemental Application to Employ Berkeley*
3 *Research Group, LLC as Consultant and Expert Witness* (the “**Supplemental Application**”) and
4 as a supplement to the *Declaration of Matthew K. Babcock in Support of the Application* [Dkt. No.
5 290] (the “**Babcock Declaration**”) and the *Supplemental Declaration of Matthew K. Babcock in*
6 *Support of the Application* [Dkt. No. 323] (the “**Second Babcock Declaration**”) in support of the
7 *Application to Employ Berkeley Research Group, LLC as Financial Advisor for the Official*
8 *Committee of Unsecured Creditors Effective as of June 23, 2023* [Dkt. No. 289] (the “**Retention**
9 **Application**”).
10

11 3. The principal BRG advisor(s) who may provide the Additional Services as
12 described in the Supplemental Application have extensive expert witness experience in complex
13 financial matters and/or not-for-profit cases with similar complex issues (particularly a number of
14 diocesan or religious order bankruptcy cases).
15

16 4. Other than BRG’s provision of the Additional Services, there are no additional
17 changes to the terms of the Retention Application and the Original BRG Retention Order.¹
18

19 5. BRG affirms that it does not hold or represent any interest adverse to and has no
20 connection with the Debtor, its creditors, the Committee, the U.S. Trustee or any party in interest.
21 On that basis, it is my understanding that BRG is a “disinterested person” within the meaning of
22 section 101(14) of the Bankruptcy Code.
23

24 6. BRG will provide the Additional Services in accordance with the terms of the
25 Supplemental Application, Retention Application and Original BRG Retention Order, as
26 applicable.
27

28 ¹ Capitalized terms not defined herein have the same meanings as ascribed to them in the Supplemental Application.

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my
2 information, knowledge, and belief. Executed this 17th day April, 2025 in Salt Lake City, Utah.

3 By: 
4 Paul N. Shields
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28