

# EXHIBIT A



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*Counsel for the Debtor  
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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

**[PROPOSED] ORDER GRANTING  
DEBTOR'S MOTION FOR ENTRY OF  
ORDER APPROVING SETTLEMENT WITH  
RUBEN GALINDO, AS TRUSTEE OF THE  
EDWARD J. BENNETT TRUST, PURSUANT  
TO FED. R. BANKR. P. 9019**

Judge: Hon. William J. Lafferty

Date: April 23, 2025

Time: 10:30 a.m.

Place: United States Bankruptcy Court  
1300 Clay Street  
Courtroom 220  
Oakland, CA 94612

1           Upon the *Debtor's Motion for Entry of Order Approving Settlement with Ruben Galindo, as*  
2 *Trustee of the Edward J. Bennett Trust, Pursuant to Fed. R. Bankr. P. 9019*, [Docket No. \_\_\_\_] (the  
3 "Motion"), filed by The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor  
4 and debtor in possession (the "Debtor") in the above-captioned chapter 11 bankruptcy case, seeking  
5 approval of a settlement agreement (the "Settlement Agreement") between Ruben Galindo ("Mr.  
6 Galindo"), as trustee of the Edward J. Bennett Trust dated December 17, 2014 (the "Bennett Trust"), and  
7 the Debtor, concerning claims the Debtor filed against Mr. Galindo in the Contra Costa County Probate  
8 Court regarding Mr. Galindo's administration of the Bennett Trust; the Court having reviewed and  
9 considered the Motion, the *Declaration of Attila Bardos in Support of Debtor's Motion for Entry of Order*  
10 *Approving Settlement with Ruben Galindo, as Trustee of the Edward J. Bennett Trust, Pursuant to Fed.*  
11 *R. Bankr. P. 9019* (the "Bardos Declaration") and all other filings in support of or opposition to the  
12 Motion; the Court finding that it has jurisdiction over this matter, that venue in this Court is proper, and  
13 that notice of the Motion was reasonable and is sufficient under the circumstances; and the Court finding  
14 the relief requested in the Motion is in the best interests of the Debtor, its creditors, and other parties in  
15 interest; and after due deliberation and good cause appearing therefor;

16 **IT IS HEREBY ORDERED THAT:**

- 17           1.       The Motion is granted as set forth herein.
- 18           2.       The Settlement Agreement attached as Exhibit 1 to the Bardos Declaration is approved and  
19 the Debtor is authorized to enter into the Settlement Agreement pursuant to Bankruptcy Rule 9019, as  
20 well as Section 105 of the Bankruptcy Code, with all terms and conditions of the Settlement Agreement  
21 incorporated by reference herein, it being the intention of the Court to approve each of them in this Order.
- 22           3.       Pursuant to Bankruptcy Rule 9019, as well as Section 105 of the Bankruptcy Code, the  
23 Debtor is authorized to enter into, perform, execute, and deliver all documents, and to take all actions,  
24 necessary to immediately and/or fully implement and perform the Settlement Agreement in accordance  
25 with the terms, conditions, and agreements set forth therein, all of which are hereby approved.
- 26           4.       The Settlement Agreement reflects a consensual compromise and settlement of the  
27 Debtor's claims against Mr. Galindo.
- 28

1           5.       This Order shall not be treated as or deemed evidence of or an admission of any fact or  
2 liability by any party, or of the merit or lack of merit of any claim or defense of any party.

3           6.       Any objections or reservations of rights in respect of the Settlement Agreement, Motion or  
4 the relief requested therein are hereby denied and overruled.

5           7.       The Debtor is authorized to take all actions necessary to effectuate the relief granted in this  
6 Order in accordance with the Motion.

7           8.       This Court shall retain jurisdiction with respect to all matters arising from or related to the  
8 implementation and/or interpretation of this Order.

9                               \*\*END OF ORDER\*\*

**COURT SERVICE LIST**

All ECF Recipients.

**EXHIBIT A**

*Proposed Order*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

EIGER BIOPHARMACEUTICALS, INC.,  
*et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-80040 (SGJ)

(Jointly Administered)

**ORDER (I) SETTING STATUS CONFERENCE AND CONTINUING EVIDENTIARY  
HEARING; (II) AUTHORIZING ADDITIONAL PAGES FOR SENTYNL’S REPLY  
BRIEF IN SUPPORT OF ITS MOTION FOR ALLOWANCE; AND (III)  
AUTHORIZING SENTYNL TO FILE ITS REPLY BRIEF IN SUPPORT OF ITS  
MOTION FOR ALLOWANCE AND SUPPORTING EXHIBITS UNDER SEAL**

Upon the motion (“Motion”)<sup>2</sup> of Sentynl Therapeutics, Inc. (“Sentynl”) for entry of an order (this “Order”) (I) Setting Status Conference and Continuing Evidentiary Hearing; (II)

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are: Eiger BioPharmaceuticals, Inc. (1591); EBPI Merger Inc. (9986); EB Pharma LLC (8352); Eiger BioPharmaceuticals Europe Limited (N/A); and EigerBio Europe Limited (N/A). The Debtors’ service address is 2100 Ross Avenue, Dallas, Texas 75201.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to them in the Motion.

Authorizing Additional Pages for Sentylnl's Reply Brief in Support of its Motion for Allowance; and (III) Authorizing Sentylnl to File Its Reply Brief in Support of its Motion for Allowance and Supporting Exhibits Under Seal, as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and the Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of this proceeding and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of and opportunity for a hearing on the Motion having been given; and the relief requested in the Motion being in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted on a final basis as set forth herein.
2. The April 15, 2025, hearing on Sentylnl's *Motion for Allowance of Administrative Expense Claim* is converted to a status conference and an evidentiary hearing will be set at a future date at that status conference.
3. Sentylnl is authorized to file a reply brief in support of the *Motion for Allowance of Administrative Expense Claim* in excess of 10 pages.
4. Sentylnl is authorized to file unredacted versions of the Reply and Supporting Exhibits under seal, along with any other information or documents required by the Court related thereto, or otherwise necessary to submit to the Court in connection with the Reply as determined by Sentylnl. The Reply and Supporting Exhibits, other information or documents related thereto, and references thereto shall remain confidential, and shall not be made available to anyone, other



than the Court and the United States Trustee, without (i) the prior written consent of the Liquidating Trustee, the Plan Administrator, Sentynl, and EIT, and their successors or assigns; or (ii) further order of the Court after notice to the Liquidating Trustee, the Plan Administrator, Sentynl, and EIT with an opportunity to object, and after a hearing. All parties are directed to redact any Confidential Information which may be contained in any pleadings filed in these chapter 11 cases.

5. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion under the circumstances and the requirements of Bankruptcy Rule 6004(a) and the local rules for the Bankruptcy Court for the Northern District of Texas are satisfied by such notice.

6. Notwithstanding the applicability of Bankruptcy Rule 6004(h), the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. Sentynl is authorized, but not directed, to take all such actions as are necessary or appropriate to implement the terms of this Order.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

**### END OF ORDER ###**