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*Proposed 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

**DEBTOR’S MOTION FOR AN ORDER  
AUTHORIZING AND APPROVING  
SPECIAL NOTICING AND  
CONFIDENTIALITY PROCEDURES**

Judge: Hon. William J. Lafferty

Date: TBD

Time: TBD

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



1 The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor  
2 in possession (the “Debtor” or “RCBO”) in the above-captioned chapter 11 bankruptcy case (the “Chapter  
3 11 Case” or the “Bankruptcy Case”), hereby files this motion (the “Notice and Confidentiality Motion”),  
4 pursuant to section 107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy  
5 Code”), Rules 2002 and 9018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”),  
6 and this Court’s Procedures for Filing Redacted or Sealed Confidential or Highly Sensitive Documents,  
7 effective February 7, 2022, for entry of an order (i) requiring all schedules, statements of financial affairs,  
8 creditor matrices, motions, pleadings, and any other entry into the record to be filed under seal or redacted  
9 to the extent they contain (a) non-public names of abuse claimants, potential abuse claimants, or those  
10 accused of committing or covering up abuse, (b) the private contact information of the Debtor’s current  
11 or former employees, or (c) personally identifying information of workers’ compensation claimants or  
12 minors, and (ii) limiting notice to a specific list of recipients on all but certain discrete matters identified  
13 herein.

14 By a separate application, the Debtor is requesting an order shortening time for notice and setting  
15 a hearing on this matter and other first day motions on an expedited basis.

16 This Notice and Confidentiality Motion is based on the Memorandum of Points and Authorities  
17 set forth herein, the notice of hearing on first day motions filed by the Debtor, the *Declaration of Charles*  
18 *Moore, Managing Director of Alvarez & Marsal North America, LLC, Proposed Restructuring Advisor*  
19 *to the Roman Catholic Bishop of Oakland, in Support of Chapter 11 Petition and First Day Pleadings* (the  
20 “First Day Declaration”) filed concurrently herewith and incorporated herein by reference and upon such  
21 oral and documentary evidence as may be presented at the hearing on the Notice and Confidentiality  
22 Motion.

23 The Debtor’s proposed forms order granting the relief requested herein on an interim basis (the  
24 “Interim Order”) and a final basis (the “Final Order”) are attached hereto as **Exhibit A** and **Exhibit B**.

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SPECIAL NOTICING AND CONFIDENTIALITY PROCEDURES

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**  
3 **INTRODUCTION**

4 1. The Debtor is committed to transparency and openness during the pendency of its  
5 Bankruptcy Case. It is important to the Debtor, however, that the individuals who have filed lawsuits or  
6 otherwise asserted claims against the Debtor arising out of alleged sexual abuse by clergy or other Debtor-  
7 affiliated persons continue to enjoy the anonymity and privacy afforded them under California law. That  
8 should not change for the individual abuse claimants, or for those they have accused of wrongdoing,  
9 simply because the Debtor has filed for bankruptcy. The Debtor therefore requests that the Bankruptcy  
10 Court enter a standing order directing any document containing the identity or personal identifying  
11 information of any abuse claimant, potential abuse claimant, or accused individual or entity to be filed  
12 under seal or redacted, as necessary. The Debtor further requests that this sealing or redaction requirement  
13 be extended to all parties-in-interest who need to file documents containing this specific, sensitive  
14 information.

15 2. The Debtor further requests that all parties be directed to seal or redact any documents  
16 containing the personal contact information of the Debtor's current or former employees. Many of those  
17 individuals will be listed as creditors for the simple reason that they are owed wages or benefits in the  
18 ordinary course of the Debtor's business as of the Petition Date. It makes sense to keep their personal  
19 contact information non-public to avoid the risk of identity theft or harassment. Additionally, the Debtor  
20 requests that all documents containing the identities of minor persons or containing personally identifying  
21 information of workers' compensation claimants be required to be redacted or sealed.

22 3. This Notice and Confidentiality Motion also seeks to streamline the provision of notice to  
23 parties-in-interest in this Chapter 11 Case. There are approximately 1,800 known parties-in-interest in  
24 this case. The Debtor expects this number will increase over time. Serving every filing in this Chapter  
25 11 Case on every party-in-interest will be burdensome to everyone – to the Debtor, because of the expense  
26 and time required to complete service, and to the recipients, who will have no stake or interest in most of  
27 the documents filed. For example, neither abuse claimants, the Debtor's current or former employees, nor  
28

1 the vast majority of parties-in-interest need to be inundated with the hundreds if not thousands of filings  
2 that can be expected in this case. The Debtor proposes to designate a small but central group of parties  
3 who will receive all filings in the case, and to limit all-party service to certain key case milestones such  
4 as, for example, notice of the section 341 meeting of creditors and notice of the proof of claim deadline.  
5 This has been done in the bankruptcies of other Catholic dioceses. It will reduce the estate's administrative  
6 burden and enable the Debtor to more efficiently provide parties-in-interest with notice in this Bankruptcy  
7 Case.

## 8 **II.** 9 **JURISDICTION**

10 4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334.  
11 This is a core proceeding pursuant to 28 U.S.C. § 157(b), the *Order Referring Bankruptcy Cases and*  
12 *Proceedings to Bankruptcy Judges*, General Order No. 24 (N.D. Cal.), and Rule 5011-1(a) of the  
13 Bankruptcy Local Rules for the United States District Court for the Northern District of California (the  
14 "Bankruptcy Local Rules"). Venue for this matter is proper in this district pursuant to 28 U.S.C. §§ 1408  
15 and 1409.

16 5. The legal bases for the relief requested herein include Rules 2002 and 9018 of the Federal  
17 Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), section 107(b) of the Bankruptcy Code, and  
18 this Court's *Procedures for Filing Redacted or Sealed Confidential or Highly Sensitive Documents*,  
19 *effective February 7, 2022*.

## 20 **III.** 21 **BACKGROUND FACTS**

22 6. On the date of this Motion (the "Petition Date"), the Debtor caused its attorneys to file a  
23 voluntary petition for chapter 11 bankruptcy relief under Bankruptcy Code. The Debtor continues to  
24 operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108  
25 of the Bankruptcy Code. No trustee, examiner, or statutory committee has been appointed in this Chapter  
26 11 Case.

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1 13. Through common missions, the Debtor is affiliated with certain entities that are separately  
2 incorporated under California law and which are not debtors in this Bankruptcy Case (each such affiliated  
3 incorporated entity a “Non-Debtor Catholic Entity,” and collectively, the “Non-Debtor Catholic Entities”).  
4 The Debtor provides administrative services (centralized human resources, accounting, and financial  
5 management) and programmatic support services to certain Non-Debtor Catholic Entities in support of  
6 their religious, educational and charitable missions. Each Non-Debtor Catholic Entity operates  
7 independently and accounts for its operations separately. None of the Non-Debtor Catholic Entities have  
8 sought relief under chapter 11 or are debtors in this Bankruptcy Case.

9 14. Among the affiliates of the Debtor are the Non-Debtor Catholic Entities. This includes,  
10 without limitation, the Roman Catholic Welfare Corporation of Oakland, a California nonprofit religious  
11 corporation (“RCWC”), and the Roman Catholic Cemeteries of the Diocese of Oakland, a California  
12 corporation (“RCC”). RCWC oversees 32 elementary schools and two high schools. RCC operates and  
13 administers the six diocesan cemeteries, five diocesan mortuaries, two mausoleums, and one  
14 crematory. RCC is also the Debtor’s secured lender.

15 15. Under Canon Law, a diocese is “a portion of the people of God which is entrusted to a  
16 bishop for him to shepherd with the cooperation of the presbyterium....” (c. 369). As such, a diocese is  
17 inherently *territorial*, comprised of a specific geographic area and the faithful within it. A diocese  
18 conducts its civil affairs for the practice of the Catholic Church within that geographic area and for the  
19 faithful within the area.

20 16. Also under Canon Law, every diocese is divided into distinct parts, known as parishes, that  
21 are ecclesiastical entities consisting of communities of the faithful whose pastoral care is entrusted to a  
22 pastor (i.e., a priest) whom the bishop appoints to serve the parish to which he is assigned. (cc. 374 §1,  
23 515 §1.)

24 17. Each diocese, and each parish within a diocese, is a separate public juridic person. (cc.  
25 573, 515 §3.) The administration of property belonging to a juridic person pertains to its administrator,  
26 such as the diocesan bishop over the property of a diocese, and the priest over the property of a parish.



1 (cc. 393, 532.) Each such administrator is obligated to acquire, hold, administer, and/or alienate such  
2 property in accordance with Canon Law (c. 1257), which requires that property held by any juridic  
3 person—diocese, parish, or otherwise—must be used for the purposes of the Catholic Church. The bishop  
4 is responsible for administering the property belonging to the diocese, and each pastor is responsible for  
5 being the exclusive administrator of the property belonging to his parish. Similarly, the pastoral care of  
6 the faithful across the entire diocese is entrusted to the bishop, whereas the pastoral care of the faithful  
7 within each particular parish is entrusted to the pastor for the parish.

8 18. Addressing the needs of victim-survivors of clergy sexual abuse, and the protection of  
9 children, have long been priorities of the Debtor. More than a decade before the U.S. Conference of  
10 Catholic Bishops adopted in the Spring of 2002 the *Charter for the Protection of Children and Young  
11 People* (the “Charter”), the Debtor established a “Sensitive Issues Committee” to assist the bishop in  
12 reviewing and handling allegations of sexual abuse by persons acting in the name of the Catholic Church.

13 19. Following the Charter’s adoption, the Sensitive Issues Committee was renamed the  
14 Diocesan Review Board in 2003 and again renamed the Minor Diocesan Review Board in 2022 (the  
15 “MDRB”). The MDRB actively functions today. Its five lay members (including a victim-survivor of  
16 clergy sexual abuse and business consultant, a former district attorney, a social worker, a retired  
17 educational administrator, and a lay pastoral associate) and three clergy members meet at least quarterly  
18 to assess allegations and make recommendations on the handling of those allegations of sexual abuse of  
19 children by clergy. This consultative body is critical to the Debtor’s work to address crimes against  
20 children. The MDRB works with the bishop to analyze and properly respond to claims so credibility can  
21 be determined and acted upon in the best interest of the victim-survivor.

22 20. In 2004, the Debtor began developing specific “safe environment” trainings for all adults  
23 – whether volunteer or employed – who serve in the diocese. The Debtor gives rigorous attention to  
24 training materials and teaches adult parish and school leaders to facilitate the training program. Processes  
25 have been put in place to refer anyone with claims regarding clergy sexual abuse to law enforcement and  
26 Debtor representatives for assistance.

1           21.     The Office of Safe Environment has continually improved the content of its trainings and,  
2 when online platforms became available, former Bishop John S. Cummins approved their use. In 2016,  
3 Bishop Barber moved the training program to an online synchronous platform provided by The National  
4 Catholic Risk Retention Group known as Virtus, an international leader in abuse awareness training. The  
5 Debtor now has local safe environment coordinators in each of the Churches. There are local safe  
6 environment coordinators in every Catholic school within the diocese.

7           22.     In the State of California, there have been two “open window” periods allowing individuals  
8 to bring claims under civil law for childhood sexual abuse which otherwise were barred because the statute  
9 of limitations (prescription) had expired. In 2002, the California Legislature permitted certain expired  
10 claims of childhood sexual abuse not only against the perpetrators but also against third-party defendants  
11 (like the Debtor) for a one-year period starting January 1, 2003 (the “First Legislation”). The Debtor paid  
12 approximately \$56,000,000 to 52 plaintiffs in settlement of claims brought in the wake of the First  
13 Legislation.

14           23.     On October 13, 2019, Governor Gavin Newsom signed into law California Assembly Bill  
15 No. 218 (“AB 218”). AB 218 revived the statute of limitations for individuals to file civil lawsuits for  
16 childhood sexual abuse. This allowed certain individuals to bring what had been time-barred claims  
17 against individuals and entities for such claims through and including December 31, 2022. As of May 4,  
18 2023, there were approximately 332 separate, active lawsuits or mediation demands pending against the  
19 Debtor filed by plaintiffs alleging sexual abuse by clergy or others associated with the Debtor.<sup>1</sup>

20           24.     In this Chapter 11 Case, the Debtor will pursue a plan of reorganization that will (a) ensure  
21 a fair and equitable outcome for victim-survivors of sexual abuse, and (b) allow the Debtor to stabilize its  
22 finances, continue its mission to serve the needs of the faithful within the diocese, and continue to provide  
23 services to underserved people and groups in the East Bay.

24  
25 \_\_\_\_\_  
26 <sup>1</sup> It is the Debtor’s understanding that there is a backlog associated with the processing of these cases in the Clerk’s Office for  
27 Alameda County, and it is possible that other timely filed claims will be processed after the filing of this case of which the  
28 Debtor is not currently aware.

1 25. Additional information regarding the Debtor, its mission, ministries, and operations, and  
2 the events and circumstances preceding the Petition Date is set forth in the First Day Declaration.

3 **IV.**  
4 **RELIEF REQUESTED**

5 26. By this Notice and Confidentiality Motion, the Debtor requests that the Court enter an order  
6 requiring (i) all schedules, statements of financial affairs, creditor matrix, motions, pleadings, and any  
7 other entry into the record under seal to the extent it contains (a) non-public names of abuse claimants,  
8 potential abuse claimants, or those accused of committing or covering up abuse, (b) the personal contact  
9 information of any current or former employee of the Debtor, or (c) personally identifying information of  
10 workers' compensation claimants or minors, and (ii) limiting notice of filings to a specific list of recipients  
11 for all but a few discrete matters identified herein.

12 **V.**  
13 **BASIS FOR RELIEF**

14 **A. The Redaction of Information Identifying Abuse Claimants Protects Those**  
15 **Individuals, Comports With California Law, And Promotes Efficiency.**

16 27. Bankruptcy courts have the power to issue orders that will protect persons from potential  
17 harm that may result from the disclosure of confidential information. *See* 11 U.S.C. § 107(b)(2) (“On  
18 request of a party in interest, the bankruptcy court shall, and on the bankruptcy court’s own motion, the  
19 bankruptcy court may protect a person with respect to scandalous or defamatory matter contained in a  
20 paper filed in a case under this title.”). Although section 107(b) of the Bankruptcy Code is an exception  
21 to the general rule of open disclosure, applying it to this Bankruptcy Case is appropriate. *See In re Orion*  
22 *Pictures Corp.*, 21 F.3d 24, 27 (2d Cir. 1994) (“Congress, itself, has recognized that under compelling or  
23 extraordinary circumstances, an exception to the general policy of public access is necessary . . . . Section  
24 107(b) of the Bankruptcy Code, a statutory exception to the broad principle of § 107(a), [ ] responds to  
25 this need.”).

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1 the best interests of its estate and its creditors and will not prejudice the rights of any party-in-interest. As  
2 noted in the Debtor’s application to employ a noticing agent, the noticing agent will post copies of all  
3 pleadings filed by any party on a web page to allow free public access to all pleadings on the docket in this  
4 matter.

5 34. Documents that may be subject to sealing or redaction include the creditor matrix, the  
6 Debtor’s schedules of assets and liabilities, and any pleadings or other documents, including affidavits of  
7 service, filed in this chapter 11 case containing information that might identify abuse claimants, potential  
8 abuse claimants, or accused priests or other defendants named in the Abuse Lawsuits.

9 35. After the filing of any sealed or redacted document, the Debtor will promptly serve an  
10 unsealed or unredacted version of the document on the Bankruptcy Court, the Office of the U.S. Trustee  
11 for Region 17, and counsel for any statutory creditors’ committee appointed in this Bankruptcy Case under  
12 section 1102 of the Bankruptcy Code (the “Distribution Parties”). The Distribution Parties shall keep  
13 strictly confidential all copies of unsealed or unredacted documents provided by the Debtor.

14 36. Additionally, the Debtor is required to list its current and former employees in the creditor  
15 matrix, among other submissions. In order to protect against the risk of identity theft and the disclosure  
16 of personal identifying information of its employees and former employees, the Debtor also requests  
17 authority to redact the home addresses and other personal contact information for these individuals.

18 37. The Debtor respectfully submits that it is appropriate under section 107 of the Bankruptcy  
19 Code to authorize the Debtor to redact from any paper filed with the Court in this chapter 11 case personal  
20 contact information of the Debtor’s employees. That information could be used to perpetrate identity theft  
21 or to harass those individuals. The threat of identity theft or harassment is of particular importance in  
22 these proceedings, which the Debtor expects to garner substantial media publicity. The Debtor proposes  
23 to provide an unredacted version of the creditor matrix and any related schedules and statements of  
24 financial affairs to the Distribution Parties.

25 38. Courts routinely grant similar relief in comparable chapter 11 cases. *See, e.g., In re Diocese*  
26 *of Rochester*, Case No. 19-20905 (Bankr. W.D.N.Y. Sept. 13, 2019) [ECF No. 29] (authorizing filing of  
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1 portions of schedules and creditor matrix under seal); *In re Charming Charlie Holdings Inc.*, Case No.  
2 19-11534 (Bankr. D. Del. July 12, 2019), [ECF No. 74] (granting authority to redact “personal information  
3 of [debtors’] employees and former employees listed on the Creditor Matrix,” subject to providing  
4 unredacted versions upon reasonable request); *In re Cloud Peak Energy Inc.*, Case No. 19-11047 (Bankr.  
5 D. Del. May 14, 2019), [ECF No. 97] (debtors “authorized to redact the address information of employees  
6 from any list of creditors”); *In re CGG Holdings (U.S) Inc.*, No. 17-11637 (MG) (Bankr. S.D.N.Y. June  
7 14, 2017), [ECF No. 306] (authorizing debtors to redact personal information of current and former  
8 employees from statements and schedules); *In re Soundview Elite LTD.*, No. 13-13098 (REG) (Bankr.  
9 S.D.N.Y. 2017) [ECF No. 404] (authorizing trustee to identify investors by descriptive identifiers only  
10 and redact investor addresses from schedules and statements per Cayman Islands privacy laws).

11 39. In recognition of the sensitivity of disclosure related to these individuals, the Debtor  
12 respectfully submits that the Court has the authority to approve the sealing or redaction of any document  
13 containing their personal contact information.

14 40. There are two other groups of individuals who should be subject to a global sealing or  
15 redaction order. One is individuals who have submitted workers’ compensation claims in connection with  
16 the Debtor’s workers’ compensation policies. Documents related to those claims may contain personally  
17 identifying information (PII), the disclosure of which is prohibited by the Health Insurance Portability and  
18 Accountability Act of 1996 (HIPAA). Any such PII should be redacted or sealed from public view. The  
19 other is individuals under the age of 18. There is no compelling public interest to have the identities of  
20 minors made public in these proceedings. All PII relating to minors should likewise be redacted or sealed.

21 41. It will be more efficient to enter a single order allowing these limited, specific categories  
22 of information to be sealed or redacted, one that is applicable for the duration of the case, than to require  
23 parties-in-interest to move to seal or redact every time they need to file a document containing this  
24 information.

25 42. The Debtor requests that the order approving these confidentiality and sealing procedures  
26 be a standing order that will remain in force for the duration of the Bankruptcy Case and that shall be  
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1 followed by all parties-in-interest. The Debtor further requests that it and all other parties-in-interest be  
2 permitted to file the confidential information described herein under seal or redacted, as necessary, without  
3 further order of the Bankruptcy Court.

4 **B. The Proposed Limited Notice Procedures Will Reduce Administrative Expenses**  
5 **And Provide Adequate Due Process.**

6 43. Bankruptcy Rule 2002(m) provides that the court may from time to time enter orders  
7 designating the manner in which notices may be sent, and the entities to whom notices may be sent.  
8 Bankruptcy Rule 2002(i) provides that:

9 . . . the Court may order that notices required under subdivision (a)(2), (3)  
10 and (6) of this rule to be transmitted to the United States trustee and be  
11 mailed only to the committees elected under § 705 or appointed under §  
12 1102 of the Code or to their authorized agents and to the creditors and equity  
13 security holders who serve on the trustee or debtor in possession and file a  
14 request that all notices be mailed to them. A committee appointed under §  
15 1114 shall receive copies of all notices required by subdivisions (a)(1),  
16 (a)(5), (b), (f)(2) and (f)(7), and such other notices as the court may direct.

17 FED. R. BANKR P. 2002(i). Courts in other diocese bankruptcies have recognized the importance of  
18 limited notice in chapter 11 cases and have granted similar motions to limit notice. *See, e.g., In re Roman*  
19 *Catholic Bishop of Stockton*, Case No. 14-20371, Dkt. No. 67 (Bankr. E.D.Cal. 2014); *In re The Roman*  
20 *Catholic Church of the Archdiocese of New Orleans*, 20-10846, Dkt. No. 22 (Bankr. E.D. La. 2020).

21 44. The Debtor estimates that as many as 1,800 creditors and parties-in-interest, and possibly  
22 more, may be technically entitled to notice in this case. To require the Debtor to provide notice of all  
23 pleadings and other papers filed in this case to all parties-in-interest, no matter how limited their interest  
24 may be in a particular matter, would be burdensome and costly to the estate in light of the photocopying,  
25 postage, and other expenses associated with large mailings.

26 45. The Debtor proposes to create a service list comprised of the core parties-in-interest in the  
27 Bankruptcy Case (the “Core Service List”) who would be entitled to receive service of all filings. Those  
28 parties-in-interest should include: (i) the Office of the United States Trustee for Region 17; (ii) the Debtor;  
(iii) the attorneys for the Debtor; (iv) the attorneys for the unsecured creditors’ committee (the

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1 “Creditors’ Committee”) once that committee has been appointed; (v) the Debtor’s twenty (20) largest  
2 unsecured creditors via their attorneys, until such time as the Creditors’ Committee is appointed; (vi)  
3 those persons who have formally appeared by filing a Notice of Appearance, a Request for Notice, or a  
4 similar document and requested notice in this case under Bankruptcy Rule 2002; (vii) the California  
5 Attorney General’s Office; and (viii) RCC or its counsel.

6 46. In furtherance of the Debtor’s request and consistent with the relief requested in this  
7 Motion, the Debtor has prepared a proposed initial Core Service List, a copy of which is attached hereto  
8 as **Exhibit C** and incorporated herein by reference.

9 47. The matters with respect to which notice would be limited to the Core Service List would  
10 include all matters covered by Bankruptcy Rule 2002, with the express exception of the following: (i)  
11 notice of the first meeting of creditors under section 341 of the Bankruptcy Code; (ii) the time fixed for  
12 filing proofs of claim under Bankruptcy Rule 3003(c); (iii) the time fixed for filing objections to, and the  
13 hearing to consider approval of, a disclosure statement or confirmation of a plan of reorganization; (iv)  
14 notice and transmittal of ballots for accepting or rejecting a plan of reorganization; (v) notice of the time  
15 fixed to accept or reject a proposed modification of a chapter 11 plan; and (vi) notice of any hearing on a  
16 motion to dismiss the Bankruptcy Case or to convert the Bankruptcy Case to chapter 7. In addition to  
17 Rule 2002 matters, the Core Service List also would be used for matters that may be required by the  
18 Bankruptcy Local Rules to be served upon all parties-in-interest.

19 48. The Debtor will serve a copy of the order approving this Motion on all parties-in-interest  
20 within three days of the entry of the order. The proposed order includes instructions on how a party-in-  
21 interest can be included on the Core Service List.

22 49. The Debtor will update the Core Service List to include those persons or parties who have  
23 made a written request to be included on the Core Limited Service List: (i) every seven (7) days during  
24 the first thirty (30) calendar days of this case; and (ii) monthly thereafter throughout the pendency of this  
25 case to include the name and address of any party-in-interest that has made a written request for notice  
26 since the Core Service List was last updated. Such updated Core Service List will be filed with the Court

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1 and circulated to all parties appearing on the Core Service List only in the event that there is a change to  
2 the Core Service List.

3 50. Upon the completion of noticing any particular matter, the serving party or its agent will  
4 submit to the Court an affidavit or certificate of service and an attached list of parties receiving notice  
5 within three (3) business days of service. The affidavit or certificate of service may state that all parties  
6 on the Core Service List were served in lieu of individually identifying each party on the Core Service  
7 List.

8 51. The Debtor requests that the order approving these notice procedures be a standing order  
9 that will remain in force for the duration of the Bankruptcy Case and that shall be followed by all parties-  
10 in-interest. The Debtor further requests that it and any other party-in-interest be permitted to limit service  
11 to the parties on the Core Service List, other than for the matters described in paragraph 48, without further  
12 order of the Bankruptcy Court.

13 **C. Basis for Relief Under Bankruptcy Rule 6003(b)**

14 52. Bankruptcy Rule 6003(b) provides that, to the extent relief is necessary to avoid immediate  
15 and irreparable harm, the Court may issue an order within the first 21 days of a chapter 11 case granting  
16 “a motion to use, sell, lease, or otherwise incur an obligation regarding property of the estate, including a  
17 motion to pay all or part of a claim that arose before the filing of the petition.” Fed. R. Bankr. P. 6003(b).

18 53. As described herein and in the First Day Declaration, the Debtor is required to keep the  
19 identity of abuse claimants confidential. Because the Debtor is obligated to file certain disclosures like a  
20 creditor matrix, a list of its top 20 unsecured creditors, and its schedules and statements of financial affairs  
21 within the first days and weeks of this case, the ability to seal or redact confidential information is needed  
22 immediately. The Debtor also needs to file additional motions and applications in the coming days, and  
23 will need to send all such filings to all parties if the relief requested herein is not granted. Accordingly,  
24 the Debtor respectfully submits that the relief requested herein is necessary to avoid immediate and  
25 irreparable harm, and, therefore, Bankruptcy Rule 6003 is satisfied.

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28 DEBTOR’S MOTION TO AUTHORIZE AND APPROVE  
SPECIAL NOTICING AND CONFIDENTIALITY PROCEDURES

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**VI.  
RESERVATION OF RIGHTS**

54. Nothing contained in this Notice and Confidentiality Motion is intended to be or shall be construed as (i) an admission as to the validity of any claim against the Debtor, (ii) a waiver of the Debtor's or any appropriate party in interest's rights to dispute any claim, or (iii) an approval or assumption of any agreement, contract, program, policy, or lease under section 365 of the Bankruptcy Code.

55. Nothing contained in this Notice and Confidentiality Motion is intended to be or shall be construed as a waiver of any of the Debtor's rights under any applicable law, including, without limitation, the Code of Canon law, the First Amendment of the United States Constitution, the Constitution of the State of California, California Corporations Code §§ 10000-10015, the Religious Freedom Restoration Act of 1993 (42 U.S.C. §§ 2000bb-2000bb-4), the church autonomy doctrine, charitable trust law, California trust law, and the Debtor's rights under any insurance policies and to proceeds thereof, and to object to disclosure of information and contend that certain assets discussed in this Notice and Confidentiality Motion are not property of the estate.

**VII.  
NOTICE**

56. Notice of this Notice and Confidentiality Motion will be provided to (i) the Office of the U.S. Trustee for Region 17; (ii) the Debtor's 20 largest unsecured creditors; (iii) the Office of the California Attorney General; (iv) counsel for RCC; and (v) those persons who have formally appeared in this Chapter 11 Case and requested service pursuant to Bankruptcy Rule 2002. Based on the urgency of the circumstances surrounding this Notice and Confidentiality Motion and the nature of the relief requested herein, the Debtor respectfully submits that no further notice is required.

DEBTOR'S MOTION TO AUTHORIZE AND APPROVE  
SPECIAL NOTICING AND CONFIDENTIALITY PROCEDURES

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**VIII.  
CONCLUSION**

57. WHEREFORE, the Debtor respectfully requests entry of an order granting the relief requested in this Notice and Confidentiality Motion and such other and further relief as the Court may deem just and appropriate.

DATED: May 8, 2023

**FOLEY & LARDNER LLP**

Jeffrey R. Blease  
Thomas F. Carlucci  
Shane J. Moses  
Emil P. Khatchatourian  
Ann Marie Uetz  
Matthew D. Lee

*/s/ Thomas F. Carlucci*

\_\_\_\_\_  
THOMAS F. CARLUCCI

*Proposed Counsel for the Debtor  
and Debtor in Possession*

DEBTOR'S MOTION TO AUTHORIZE AND APPROVE  
SPECIAL NOTICING AND CONFIDENTIALITY PROCEDURES

# **Exhibit A**

1 **FOLEY & LARDNER LLP**

2 Jeffrey R. Blease (CA Bar. No. 134933)

3 Tel: (617) 226-3155; [jblease@foley.com](mailto:jblease@foley.com)

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14 555 California Street, Suite 1700

15 San Francisco, CA 94104-1520

16 *Proposed Counsel for the Debtor  
and Debtor in Possession*

17 **UNITED STATES BANKRUPTCY COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **OAKLAND DIVISION**

20 In re:

21 THE ROMAN CATHOLIC BISHOP OF  
22 OAKLAND, a California corporation sole,

23 Debtor.

Case No. 23-40523

Chapter 11

**[PROPOSED] INTERIM ORDER  
APPROVING DEBTOR'S MOTION FOR AN  
ORDER AUTHORIZING AND APPROVING  
SPECIAL NOTICING AND  
CONFIDENTIALITY PROCEDURES**

Judge: Hon. William J. Lafferty

Date: TBD

Time: TBD

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

1 Upon the *Debtor's Motion For an Order Authorizing and Approving Special Noticing and*  
2 *Confidentiality Procedures*, dated May 8, 2023 (the "Notice and Confidentiality Motion"),<sup>1</sup> filed by the  
3 Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession  
4 (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or  
5 the "Bankruptcy Case") for entry of interim and final orders (i) requiring all schedules, statements of  
6 financial affairs, creditor matrices, motions, pleadings, and any other entry into the record to be filed under  
7 seal or redacted to the extent they contain (a) non-public names of abuse claimants, potential abuse  
8 claimants, or those accused of committing or covering up abuse, (b) the private contact information of the  
9 Debtor's current or former employees, or (c) personally identifying information of workers' compensation  
10 claimants or minors, and (ii) limiting notice to a specific list of recipients on all but certain discrete matters  
11 identified in the Notice and Confidentiality Motion; the Court having reviewed and considered the Notice  
12 and Confidentiality Motion, the First Day Declaration, all other filings in support of any opposition to the  
13 Notice and Confidentiality Motion, and the arguments made at the hearing on the Notice and  
14 Confidentiality Motion; the Court finding that it has jurisdiction over this matter, that venue in this Court  
15 is proper, and that notice of the Notice and Confidentiality Motion and the interim hearing thereon was  
16 reasonable and sufficient under the circumstances for the granting of interim relief; the Court finding that  
17 there is good cause for entry of an immediate interim order pursuant to Fed. R. Bankr. P. 6003; and the  
18 Court further finding that the relief requested in the Notice and Confidentiality Motion is in the best  
19 interests of the Debtor, its creditors, and other parties in interest; and after due deliberation and good cause  
20 appearing,

21 **IT IS HEREBY ORDERED THAT:**

- 22 1. The Notice and Confidentiality Motion is GRANTED on a interim basis as set forth herein.  
23 2. All parties-in-interest shall redact or file under seal those portions of any document that  
24 contain any of the following : (a) non-public names of abuse claimants, potential abuse claimants, or those  
25 accused of committing or covering up abuse, (b) the personal contact information of any current or former  
26

27 <sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Notice and Confidentiality  
28 Motion.

1 employee of the Debtor, or (c) personally identifying information of workers' compensation claimants or  
2 minors. No further order of the Court shall be required to seal or redact the aforementioned information.

3 3. The Debtor shall establish and file the Core Service List that shall initially include the  
4 following parties-in-interest: (i) the Office of the United States Trustee for Region 17; (ii) the Debtor;  
5 (iii) the attorneys for the Debtor; (iv) the attorneys for the unsecured creditors' committee (the  
6 "Creditors' Committee") once that committee has been appointed; (v) the Debtor's twenty (20) largest  
7 unsecured creditors via their attorneys, until such time as the Creditors' Committee is appointed; (vi)  
8 those persons who have formally appeared by filing a Notice of Appearance, a Request for Notice, or a  
9 similar document and requested notice in this case under Bankruptcy Rule 2002; (vii) the California  
10 Attorney General's Office; and (viii) RCC or its counsel.

11 4. Any party-in-interest wishing to be included on the Core Service List shall file a notice of  
12 such request with the Court (by CM/ECF for those who are authorized users or, for those who are not  
13 authorized CM/ECF users, by submitting a paper copy, by mail or in person, to the Clerk of the Court, at  
14 the following address: The Clerk of the United States Bankruptcy Court for the Northern District of  
15 California, Oakland Division, 1300 Clay Street, Suite 300, Oakland, CA, 94612) and serve a written copy  
16 of such request to the Debtor's bankruptcy counsel at the following address: Ann Marie Uetz, Foley &  
17 Lardner LLP, 500 Woodward Avenue, Suite 2700, Detroit, MI 48226-3489, auetz@foley.com.

18 5. The Debtor will update the Core Service List to include those persons or parties who have  
19 made a written request to be included on the Core Limited Service List: (i) every seven (7) days during  
20 the first thirty (30) calendar days of this case; and (ii) monthly thereafter throughout the pendency of this  
21 case. The Debtor will file a notice of each updated Core Service List if it includes changes from the last  
22 Core Service List filed with the Court.

23 6. The Core Service List shall clearly identify interested parties and their counsel who  
24 participate in the CM/ECF system.

25 7. Any person filing a pleading or a paper in this case shall serve such pleading or paper on  
26 (a) all parties-in-interest listed on the most recent Core Service List, and (b) any creditor or other party-  
27 in-interest whose interests are likely to be affected directly by the pleading or proceeding. The serving  
28

1 party shall file with the Court an affidavit or certificate of service and an attached list of parties receiving  
2 notice within three (3) business days of service. The affidavit or certificate of service can state that all  
3 parties on the Core Service List were served in lieu of individually identifying each party on the Core  
4 Service List, in which case, it shall indicate the date of the Core Service List used.

5 8. The electronic service by email which includes as a PDF attachment the documents served  
6 by any person who participates in the ECF system or provides an email address on a request for notice  
7 constitutes service of the pleading or paper and no conventional hard copy service on such interested party  
8 shall be required, *provided however*, that notices required by Bankruptcy Rule 2002(a)(1), (4), (5), and  
9 (7) and (b)(1) and (2) shall be served by mail in hard copy.

10 9. Notwithstanding the foregoing, the following shall be provided to all known creditors and  
11 other parties-in-interest, at their last address known to the Debtor, unless otherwise ordered by the Court:  
12 (i) notice of the first meeting of creditors pursuant to section 341 of title 11 of the United States Code, 11  
13 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”); (ii) notice of the time fixed for filing proofs of claim  
14 pursuant to Bankruptcy Rule 3003(c); (iii) notice of the time fixed for filing objections to, and the hearing  
15 to consider approval of, a disclosure statement or confirmation of a plan of reorganization; (iv) notice and  
16 transmittal of ballots for accepting or rejecting a plan of reorganization; (v) notice of time fixed to accept  
17 or reject a proposed modification of a chapter 11 plan; and (vi) notice of any hearing on a motion to  
18 dismiss the Bankruptcy Case or to convert the Bankruptcy Case to chapter 7.

19 10. The Debtor is directed to serve a copy of this Order on all creditors on the Creditor Matrix  
20 along with a simple form to submit to request notice in the form substantially the same as that attached to  
21 the Motion within five (5) business days of the entry of this Order and to file a certificate of service with  
22 the Clerk of the Court.

23 11. Notices under Bankruptcy Rules 2002(a)(2), 2002(a)(3) and 2002(a)(6) shall be served on  
24 all parties identified in Rule 2002(a) until the U.S. Trustee appoints an official committee on unsecured  
25 creditors. After such appointment, notices under Bankruptcy Rules 2002(a)(2), 2002(a)(3) and 2002(a)(6)  
26 may be served on the Core Service List only. Notice for the matters specified in Bankruptcy Rules  
27 2002(a)(4) and 2002(a)(5) shall be served on all parties identified in Rule 2002(a).



1 12. Complaints, summons, and contested matters shall be served on parties directly affected  
2 by the pleading or proceeding in the manner prescribed by Federal Bankruptcy Rules 7004 and 9014(b),  
3 unless such party expressly consents to electronic service.

4 13. A final hearing on the Notice and Confidentiality Motion shall be held on [REDACTED],  
5 2023] at [REDACTED]: [REDACTED].m.] (Prevailing Pacific Time). Any objections to the granting of the relief requested in  
6 the Notice and Confidentiality Motion on a final basis shall be filed not later than [REDACTED], 2023].

7 14. This Order shall be immediately effective and enforceable upon entry.

8 15. The Debtor is authorized to take all actions necessary or appropriate to effectuate the relief  
9 granted in this Order.

10 16. This Court shall retain jurisdiction with respect to all matters arising from or related to the  
11 implementation of or interpretation of this Order.

12 \*\*END OF ORDER\*\*

# **Exhibit B**

1 **FOLEY & LARDNER LLP**

2 Jeffrey R. Blease (CA Bar. No. 134933)

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5 Tel: (415) 984-9824; [tcarlucchi@foley.com](mailto:tcarlucchi@foley.com)

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13 Tel: (608) 258-4203; [mdlee@foley.com](mailto:mdlee@foley.com)

14 555 California Street, Suite 1700

15 San Francisco, CA 94104-1520

16 *Proposed Counsel for the Debtor  
and Debtor in Possession*

17 **UNITED STATES BANKRUPTCY COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **OAKLAND DIVISION**

20 In re:

21 THE ROMAN CATHOLIC BISHOP OF  
22 OAKLAND, a California corporation sole,

23 Debtor.

Case No. 23-40523

Chapter 11

**[PROPOSED] FINAL ORDER APPROVING  
DEBTOR'S MOTION FOR AN ORDER  
AUTHORIZING AND APPROVING  
SPECIAL NOTICING AND  
CONFIDENTIALITY PROCEDURES**

Judge: Hon. William J. Lafferty

Date: TBD

Time: TBD

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

1 Upon the *Debtor's Motion For an Order Authorizing and Approving Special Noticing and*  
2 *Confidentiality Procedures*, dated May 8, 2023 (the "Notice and Confidentiality Motion"),<sup>1</sup> filed by the  
3 Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession  
4 (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Bankruptcy Case")  
5 for entry of interim and final orders (i) requiring all schedules, statements of financial affairs, creditor  
6 matrices, motions, pleadings, and any other entry into the record to be filed under seal or redacted to the  
7 extent they contain (a) non-public names of abuse claimants, potential abuse claimants, or those accused  
8 of committing or covering up abuse, (b) the private contact information of the Debtor's current or former  
9 employees, or (c) personally identifying information of workers' compensation claimants or minors, and  
10 (ii) limiting notice to a specific list of recipients on all but certain discrete matters identified in the Notice  
11 and Confidentiality Motion; the Court having reviewed and considered the Notice and Confidentiality  
12 Motion, the First Day Declaration, all other filings in support of any opposition to the Notice and  
13 Confidentiality Motion, and the arguments made at the interim and final hearings on the Notice and  
14 Confidentiality Motion; the Court finding that it has jurisdiction over this matter, that venue in this Court  
15 is proper, and that notice of the Notice and Confidentiality Motion and the interim and final hearings  
16 thereon was reasonable and sufficient under the circumstances for the granting of interim and final relief;  
17 the Court finding that there is good cause for entry of an immediate interim order pursuant to Fed. R.  
18 Bankr. P. 6003; and the Court further finding that the relief requested in the Notice and Confidentiality  
19 Motion is in the best interests of the Debtor, its creditors, and other parties in interest; and after due  
20 deliberation and good cause appearing,

21 **IT IS HEREBY ORDERED THAT:**

- 22 1. The Notice and Confidentiality Motion is GRANTED on a final basis as set forth herein.  
23 2. All parties-in-interest shall redact or file under seal those portions of any document that  
24 contain any of the following : (a) non-public names of abuse claimants, potential abuse claimants, or those  
25 accused of committing or covering up abuse, (b) the personal contact information of any current or former  
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27 <sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Notice and Confidentiality  
28 Motion.

1 employee of the Debtor, or (c) personally identifying information of workers' compensation claimants or  
2 minors. No further order of the Court shall be required to seal or redact the aforementioned information.

3 3. The Debtor shall establish and file the Core Service List that shall initially include the  
4 following parties-in-interest: (i) the Office of the United States Trustee for Region 17; (ii) the Debtor;  
5 (iii) the attorneys for the Debtor; (iv) the attorneys for the unsecured creditors' committee (the  
6 "Creditors' Committee") once that committee has been appointed; (v) the Debtor's twenty (20) largest  
7 unsecured creditors via their attorneys, until such time as the Creditors' Committee is appointed; (vi)  
8 those persons who have formally appeared by filing a Notice of Appearance, a Request for Notice, or a  
9 similar document and requested notice in this case under Bankruptcy Rule 2002; (vii) the California  
10 Attorney General's Office; and (viii) RCC or its counsel.

11 4. Any party-in-interest wishing to be included on the Core Service List shall file a notice of  
12 such request with the Court (by CM/ECF for those who are authorized users or, for those who are not  
13 authorized CM/ECF users, by submitting a paper copy, by mail or in person, to the Clerk of the Court, at  
14 the following address: The Clerk of the United States Bankruptcy Court for the Northern District of  
15 California, Oakland Division, 1300 Clay Street, Suite 300, Oakland, CA, 94612) and serve a written copy  
16 of such request to the Debtor's bankruptcy counsel at the following address: Ann Marie Uetz, Foley &  
17 Lardner LLP, 500 Woodward Avenue, Suite 2700, Detroit, MI 48226-3489, auetz@foley.com.

18 5. The Debtor will update the Core Service List to include those persons or parties who have  
19 made a written request to be included on the Core Limited Service List: (i) every seven (7) days during  
20 the first thirty (30) calendar days of this case; and (ii) monthly thereafter throughout the pendency of this  
21 case. The Debtor will file a notice of each updated Core Service List if it includes changes from the last  
22 Core Service List filed with the Court.

23 6. The Core Service List shall clearly identify interested parties and their counsel who  
24 participate in the CM/ECF system.

25 7. Any person filing a pleading or a paper in this case shall serve such pleading or paper on  
26 (a) all parties-in-interest listed on the most recent Core Service List, and (b) any creditor or other party-  
27 in-interest whose interests are likely to be affected directly by the pleading or proceeding. The serving  
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1 party shall file with the Court an affidavit or certificate of service and an attached list of parties receiving  
2 notice within three (3) business days of service. The affidavit or certificate of service can state that all  
3 parties on the Core Service List were served in lieu of individually identifying each party on the Core  
4 Service List, in which case, it shall indicate the date of the Core Service List used.

5 8. The electronic service by email which includes as a PDF attachment the documents served  
6 by any person who participates in the ECF system or provides an email address on a request for notice  
7 constitutes service of the pleading or paper and no conventional hard copy service on such interested party  
8 shall be required, *provided however*, that notices required by Bankruptcy Rule 2002(a)(1), (4), (5), and  
9 (7) and (b)(1) and (2) shall be served by mail in hard copy.

10 9. Notwithstanding the foregoing, the following shall be provided to all known creditors and  
11 other parties-in-interest, at their last address known to the Debtor, unless otherwise ordered by the Court:  
12 (i) notice of the first meeting of creditors pursuant to section 341 of title 11 of the United States Code, 11  
13 U.S.C. §§ 101, *et seq.* (the "Bankruptcy Code"); (ii) notice of the time fixed for filing proofs of claim  
14 pursuant to Bankruptcy Rule 3003(c); (iii) notice of the time fixed for filing objections to, and the hearing  
15 to consider approval of, a disclosure statement or confirmation of a plan of reorganization; (iv) notice and  
16 transmittal of ballots for accepting or rejecting a plan of reorganization; (v) notice of time fixed to accept  
17 or reject a proposed modification of a chapter 11 plan; and (vi) notice of any hearing on a motion to  
18 dismiss the Bankruptcy Case or to convert the Bankruptcy Case to chapter 7.

19 10. The Debtor is directed to serve a copy of this Order on all creditors on the Creditor Matrix  
20 along with a simple form to submit to request notice in the form substantially the same as that attached to  
21 the Motion within five (5) business days of the entry of this Order and to file a certificate of service with  
22 the Clerk of the Court.

23 11. Notices under Bankruptcy Rules 2002(a)(2), 2002(a)(3) and 2002(a)(6) shall be served on  
24 all parties identified in Rule 2002(a) until the U.S. Trustee appoints an official committee on unsecured  
25 creditors. After such appointment, notices under Bankruptcy Rules 2002(a)(2), 2002(a)(3) and 2002(a)(6)  
26 may be served on the Core Service List only. Notice for the matters specified in Bankruptcy Rules  
27 2002(a)(4) and 2002(a)(5) shall be served on all parties identified in Rule 2002(a).

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12. Complaints, summons, and contested matters shall be served on parties directly affected by the pleading or proceeding in the manner prescribed by Federal Bankruptcy Rules 7004 and 9014(b), unless such party expressly consents to electronic service.

13. This Order shall be immediately effective and enforceable upon entry.

14. The Debtor is authorized to take all actions necessary or appropriate to effectuate the relief granted in this Order.

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

\*\*END OF ORDER\*\*

**Exhibit C**

**Initial Core Service List**

<b>Service Party</b>	<b>Mailing Address</b>	<b>Email Address (if known)</b>
Roman Catholic Bishop of Oakland	2121 Harrison Street Suite 100 Oakland, CA 94612	c/o tcarlucci@foley.com
Foley & Lardner LLP	555 California Street Suite 1700 San Francisco, CA 94104 Attn: Tom Carlucci and Jeff Blease	jblease@foley.com tcarlucci@foley.com smoses@foley.com auetz@foley.com mdlee@foley.com
Office of the United States Trustee for Region 17	450 Golden Gate Avenue, 5th Floor Suite #05-0153 San Francisco, CA 94102 Attn: Greg Powell	Greg.Powell@usdoj.gov
Office of the California Attorney General	1300 I St., Ste. 1740 Sacramento, CA 95814 Attn: Bankruptcy Department	
Allen, Glaessner, Hazelwood and Werth, LLP	180 Montgomery Street Suite 1200 San Francisco, CA 94104 Attn: Peter Glaessner	p glaessner@aghwlaw.com
Doe Claimants 1 - 4	c/o Michael Reck Jeff Anderson & Associates 12011 San Vicente Blvd. Suite 700 Los Angeles, CA 90049	mreck@andersonadvocates.com
Doe Claimants 5 - 8	c/o Joseph George Joseph George Jr. Law Corporation 601 University Avenue Suite 270 Sacramento, CA 95825	mailbox@psyclaw.com
Doe Claimants 9-10	c/o Furtado, Jaspovice & Simons Rick Simons 6589 Bellhurst Lane Castro Valley, CA 94552	Rick@fjlaw.com



<b>Service Party</b>	<b>Mailing Address</b>	<b>Email Address (if known)</b>
Doe Claimants 11-12	c/o Erika Scott Winer, Burritt & Scott, LLP 1901 Harrison Street Suite 1100 Oakland, CA 94612	erika@wmlawyers.com
Doe Claimants 13-14	c/o Meghan McCormick Boucher LLP 21600 Oxnard Street Suite 600 Woodland Hills, CA 91367	mccormick@boucher.la
Doe Claimants 15-16	c/o Greg Garcia Herman Law 9434 Deschutes Road Suite 1000 Palo Cedro, CA 96073	ggarcia@hermanlaw.com
Doe Claimants 17-18	c/o Courtney Kiehl Paul Mones P.C. 13101 Washington Blvd. Suite 128 Los Angeles CA 90066	Courtney@paulmones.com
Doe Claimants 19-20	c/o Spencer Lucas Panish Shea Boyle Ravipudi LLP 11111 Santa Monica Boulevard Suite 700 Los Angeles, CA 90025	slucas@psbr.law