

FOLEY & LARDNER LLP

Thomas F. Carlucci (CA Bar No. 135767)

Tel: (415) 984-9824; tcarlucci@foley.com

Shane J. Moses (CA Bar No. 250533)

Tel: (415) 438-6404; smoses@foley.comAnn Marie Uetz (admitted *pro hac vice*)Tel: (313) 234-7114; auetz@foley.comMatthew D. Lee (admitted *pro hac vice*)Tel: (608) 258-4203; mdlee@foley.comMark C. Moore (admitted *pro hac vice*)Tel: (214) 999-4150; mmoore@foley.com

555 California Street, Suite 1700

San Francisco, CA 94104-1520

*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 WJL

Chapter 11

**NOTICE OF HEARING ON DEBTOR'S
MOTION FOR ORDER (I) APPROVING
DISCLOSURE STATEMENT; AND (II)
ESTABLISHING PROCEDURES FOR PLAN
SOLICITATION, NOTICE, AND
BALLOTING**

Judge: Hon. William J. Lafferty

Date: December 18, 2024

Time: 10:30 a.m.

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

PLEASE TAKE NOTICE THAT a hearing will be held on **Wednesday December 18, 2024, at 10:30 a.m.** (the "Hearing"), and will take place at the United States Bankruptcy Court, 1300 Clay Street, Oakland, California, before the Honorable William J. Lafferty, United States Bankruptcy Judge, to consider the *Debtor's Motion for Order (I) Approving Disclosure Statement; and (II) Establishing Procedures for Plan Solicitation, Notice, and Balloting* [Docket No. 1453] (the "Motion"), filed concurrently herewith by The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case"), by which Motion the Debtor seeks approval of the *Disclosure Statement for*

1 *Debtor's Plan of Reorganization* [Docket No. 1445] (together with all schedules and exhibits thereto, and
2 as may be modified, amended, or supplemented from time to time, the "Disclosure Statement").

3 By the Motion, the Debtor seeks entry of an order approving:

- 4 (i) the adequacy of the Disclosure Statement pursuant to 11 U.S.C. §1125(b);
- 5 (ii) procedures (the "Solicitation Procedures") for solicitation and tabulation of votes to accept
6 or reject the *Debtor's Plan of Reorganization* [Docket No. 1444] (together with all
7 schedules and exhibits thereto, and as may be modified, amended, or supplemented from
8 time to time, the "Plan"), including:
- 9 a. the forms of ballots for submitting votes to accept or reject the Plan,
- 10 b. the contents of solicitation packages to be transmitted to creditors,
- 11 c. the form of notices of the confirmation hearing and of non-voting status, and
- 12 d. the proposed record date for voting on the Plan, and
- 13 e. other related relief;
- 14 (iii) the form and procedures for certain creditors to opt out of third-party releases in the Plan
(the "Opt-Out Release Procedures");
- 15 (iv) the scheduling of a hearing on confirmation of the Plan and the form and manner of notices
16 related to the confirmation hearing; and,
- 17 (v) other related relief.

18 Copies of the Motion, Disclosure Statement, Plan, and papers filed in support thereof, and all
19 pleadings and papers filed in this Chapter 11 Case, can be obtained from the website maintained by the
20 Debtor's claims and noticing agent, Kurtzman Carson Consultants LLC, dba Verita Global, at
<https://www.veritaglobal.net/rcbo>.

21 **PLEASE TAKE FURTHER NOTICE THAT** the Hearing will be held in person in the
22 courtroom, provided that (1) hearings will be held in person but parties may attend by Zoom
23 Webinar/AT&T Teleconference; (2) additional information is available on Judge Lafferty's Procedures
page on the Court's website, which is <http://www.canb.uscourts.gov>; and (3) information on how to attend
the hearing by Zoom Webinar/AT&T Teleconference will be included with each calendar posted under
Judge Lafferty's Calendar on the court's website.

24 **PLEASE TAKE FURTHER NOTICE THAT opposition, if any, to the granting of the relief**
25 **sought in the Motion, including but not limited to the Solicitation Procedures and the Opt-Out**
26 **Release Procedures, or to the adequacy of the Disclosure Statement, must be in writing, filed with**
27 **the Bankruptcy Court not later than seven (7) days before the date set for the Hearing.** Any
28 opposition must be filed in writing with Clerk of the Bankruptcy Court at 1300 Clay Street, Suite 300,
Oakland, California, 94612 (mailing address: P.O. Box 2070, Oakland, California, 94604) and must be
served on counsel for the Debtor at the address listed above. Unless a timely objection is filed, the Court

NOTICE OF HEARING ON MOTION TO APPROVE DISCLOSURE STATEMENT

1 may grant the relief requested in the Motion without a hearing. **Failure to file and serve a timely**
2 **objection may result waiver of any objection.**

3 DATED: November 13, 2024

FOLEY & LARDNER LLP

Thomas F. Carlucci

Shane J. Moses

Ann Marie Uetz

Matthew D. Lee

Mark C. Moore

6 /s/Shane J. Moses

7 Shane J. Moses

8 *Counsel for the Debtor*
9 *and Debtor in Possession*