

1 REBECCA J. WINTHROP (SBN 116386)  
2 NORTON ROSE FULBRIGHT US LLP  
3 555 South Flower Street, Forty-First Floor  
4 Los Angeles, California 90071  
5 Telephone: (213) 892-9200  
6 Facsimile: (213) 892-9494  
7 rebecca.winthrop@nortonrosefulbright.com

8 RYAN E. MANNS (admitted *pro hac vice*)  
9 JASON I. BLANCHARD (admitted *pro hac vice*)  
10 NORTON ROSE FULBRIGHT US LLP  
11 2200 Ross Avenue, Suite 3600  
12 Dallas, Texas 75201  
13 Telephone: (214) 855-8000  
14 Facsimile: (214) 855-8200  
15 ryan.manns@nortonrosefulbright.com  
16 jason.blanchard@nortonrosefulbright.com

17 *Attorneys for Roman Catholic Welfare*  
18 *Corporation of Oakland, Roman Catholic*  
19 *Cemeteries of the Diocese of Oakland, and*  
20 *Adventus*

21  
22  
23  
24  
25  
26  
27  
28  
**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

16 *In re:*

17 THE ROMAN CATHOLIC BISHOP OF  
18 OAKLAND, a California corporation sole,  
19  
20 Debtor.

Case No. 23-40523 WJL

Chapter 11

**STIPULATION TO ADD ROMAN  
CATHOLIC WELFARE CORPORATION AS  
AN AUTHORIZED PARTY UNDER BAR  
DATE ORDER CONFIDENTIALITY  
PROTOCOL**



1 The Roman Catholic Bishop of Oakland (the “**Debtor**”); the Official Committee of Unsecured  
2 Creditors (the “**Committee**”); and the Roman Catholic Welfare Corporation of Oakland (“**RCWC**,”  
3 together with the Debtor and the Committee, the “**Parties**”), by and through their undersigned counsel,  
4 stipulate as follows:

5 **WHEREAS** on July 25, 2023, this Court issued the *Order Establishing Deadlines for Filing*  
6 *Proofs of Claim and Approving the Form and Manner of Notice Thereof* (the “**Bar Date Order**”),<sup>1</sup>  
7 which, *inter alia*, identified certain “Authorized Parties” who may receive copies of Official Proof of  
8 Claim Forms and/or Supplements filed by, or on behalf of, Sexual Abuse Claimants regarding Sexual  
9 Abuse Claims (the “**Sexual Abuse Proofs of Claim**”), provided that, *inter alia*, each Authorized Party  
10 execute a Confidentiality Agreement (the “**Bar Date Confidentiality Agreement**”). Dkt. Nos. 293 ¶  
11 14(iii).

12 **WHEREAS** on January 25, 2024, this Court entered the *Order Granting Moving Insurers’*  
13 *Motion For Entry of an Order Permitting Insurer Experts and/or Consultants To Have Access To Sexual*  
14 *Abuse Proofs of Claims and Supplements*, which modified the Bar Date Order’s definition of  
15 “Authorized Parties” to include experts and consultants of certain insurers (“**Experts**”), and entitled  
16 such Experts to access and review Sexual Abuse Proofs of Claim, provided that certain personally  
17 identifiable information on the Sexual Abuse Proofs of Claim was redacted. Dkt. No. 817 ¶¶ 2-3.

18 **WHEREAS** on October 21, 2024, this Court entered the *Stipulation to Permit Experts and*  
19 *Consultants to Access Unredacted Proofs of Claim*, which further modified the Bar Date Order’s  
20 definition of “Authorized Parties” to provide Experts with access to unredacted copies of the Sexual  
21 Abuse Proofs of Claim. Dkt. No. 1417 ¶¶ 1-2.

22 **WHEREAS** all Parties agree that RCWC should be permitted access to all Official Proof of  
23 Claim Forms and/or Supplements, including Sexual Abuse Proofs of Claim that may implicate RCWC,  
24 to help facilitate ongoing mediation between and among the Parties.

---

25  
26  
27 <sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Bar Date Order.

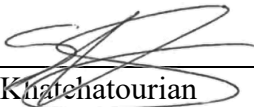




1 Dated: March 6, 2025

**FOLEY & LARDNER LLP**

2 Eileen R. Ridley (CA Bar No. 151735)  
3 Ann Marie Uetz (admitted *pro hac vice*)  
4 Matthew D. Lee (admitted *pro hac vice*)  
5 Emil P. Khatchatourian (CA Bar No. 265290)  
6 Thomas F. Carlucci (CA Bar No. 135767)  
7 Jeffrey R. Blease (CA Bar. No. 134933)

8 By:   
9 Emil P. Khatchatourian

10 *Attorneys for The Roman Catholic*  
11 *Bishop of Oakland*

**LOWENSTEIN SANDLER LLP**

12 Jeffrey D. Prol (admitted *pro hac vice*)  
13 Brent Weisenberg (admitted *pro hac vice*)  
14 Colleen M. Restel (admitted *pro hac vice*)

15 By: /s/ Brent Weisenberg  
16 Brent Weisenberg

**KELLER BENVENUTTI KIM LLP**

17 Tobias S. Keller (CA Bar. No. 151445)  
18 Jane Kim (CA Bar No. 298192)  
19 Gabrielle L. Albert (Cal. Bar No. 190895)

20 *Attorneys for the Official Committee of*  
21 *Unsecured Creditors*

**NORTON ROSE FULBRIGHT US LLP**

22 Rebecca J. Winthrop (CA Bar No. 116386)  
23 Ryan E. Manns (admitted *pro hac vice*)  
24 Jason I. Blanchard (admitted *pro hac vice*)

25 By: /s/ Rebecca J. Winthrop  
26 Rebecca J. Winthrop

27 *Attorneys for Roman Catholic Welfare Corporation*  
28 *of Oakland*

# EXHIBIT A

1 REBECCA J. WINTHROP (SBN 116386)  
NORTON ROSE FULBRIGHT US LLP  
2 555 South Flower Street, Forty-First Floor  
Los Angeles, California 90071  
3 Telephone: (213) 892-9200  
Facsimile: (213) 892-9494  
4 rebecca.winthrop@nortonrosefulbright.com

5 RYAN E. MANNS (admitted *pro hac vice*)  
JASON I. BLANCHARD (admitted *pro hac vice*)  
6 NORTON ROSE FULBRIGHT US LLP  
2200 Ross Avenue, Suite 3600  
7 Dallas, Texas 75201  
Telephone: (214) 855-8000  
8 Facsimile: (214) 855-8200  
ryan.manns@nortonrosefulbright.com  
9 jason.blanchard@nortonrosefulbright.com

10 *Attorneys for Roman Catholic Welfare*  
*Corporation of Oakland, Roman Catholic*  
11 *Cemeteries of the Diocese of Oakland, and*  
*Adventus*

12  
13 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
14 **OAKLAND DIVISION**

15  
16 *In re:*  
17 THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation sole,  
18  
19 Debtor.

Case No. 23-40523 WJL

Chapter 11

**[PROPOSED] ORDER TO ADD ROMAN  
CATHOLIC WELFARE CORPORATION AS  
AN AUTHORIZED PARTY UNDER BAR  
DATE ORDER CONFIDENTIALITY  
PROTOCOL**

1 [PROPOSED] ORDER

2 The Court having reviewed the Parties' *Stipulation to Add Roman Catholic Welfare Corporation*  
3 *as an Authorized Party Under Bar Date Order Confidentiality Protocol* (the "**Stipulation**"),<sup>1</sup> entered  
4 into between The Roman Catholic Bishop of Oakland (the "**Debtor**"); the Official Committee of  
5 Unsecured Creditors (the "**Committee**"); and the Roman Catholic Welfare Corporation of Oakland  
6 ("**RCWC**," together with the Debtor and the Committee, the "**Parties**"); and after due consideration and  
7 good cause appearing therefor,

8 **IT IS HEREBY ORDERED THAT:**

9 1. Paragraph 14(iii) of the Bar Date Order, defining "Authorized Parties," shall be modified  
10 as indicated below, with new language in blue and stricken language in red, to state:

11 ...

12 (b) Counsel to the Debtor, **counsel for RCWC**, and **counsel for the**  
13 **Committee** retained pursuant to an order of this Court, including any  
14 experts retained by or on behalf of the Debtor and the Committee  
under an order of this Court;

15 ...

16 (l) Counsel of record to any Authorized Party upon execution of a  
17 Confidentiality Agreement by such counsel; ~~and~~

18 (m) The Office of the United States Trustee; ~~and~~

19 (n) **RCWC, and such other current or former employees of the RCWC**  
20 **who are necessary to assist RCWC in verifying the facts contained**  
21 **in the Official Proof of Claim Form and/or the Supplement filed by,**  
22 **or on behalf of a Sexual Abuse Claimant; provided, however, that if**  
23 **RCWC determines that the assistance of the alleged abuser is**  
24 **necessary to verify the facts contained in the Official Proof of Claim**  
25 **Form and/or the Supplement filed by, or on behalf of a Sexual**  
26 **Abuse Claimant, RCWC shall redact and not otherwise share the**  
27 **Sexual Abuse Claimant's address or telephone number or any other**  
28 **personally identifiable information than is otherwise necessary to**

---

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Stipulation.



1 confirm the facts contained in the Official Proof of Claim Form  
2 and/or the Supplement.

3 2. All Parties and counsel may have access to the information contained in an Official Proof  
4 of Claim Form and/or Supplement filed by a Sexual Abuse Claimant only upon: (i) executing the Bar  
5 Date Confidentiality Agreement, subject to all terms, conditions and restrictions set forth therein and  
6 the Bar Date Order; and (ii) confirming in writing to counsel for the Debtor and the Committee that  
7 all relevant Parties and counsel have so executed;

8 3. Unless otherwise specifically modified herein, the Bar Date Order remains in full force  
9 and effect.

10 \*\*END OF ORDER\*\*  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**COURT SERVICE LIST**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

All ECF Recipients.