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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

Chapter 11

**BANKRUPTCY LOCAL RULE 9014-1
CERTIFICATE OF NO OBJECTION
REGARDING DOCKET NO. 1868:
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

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” or the “Bankruptcy Case”), hereby files this certificate of no objection and requests entry of an 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* [Docket No. 1868] (the “Motion”). On April 2, 2025, the Debtor filed the Motion, together with the *Declaration of Attila Bardos in Support of Debtor’s Motion for Entry of Order Approving Settlement*



1 *Edward J. Bennett Trust, Pursuant to Fed. R. Bankr. P. 9019* [Docket No. 1869] (the “Bardos
2 Declaration”), and the *Notice of Hearing on Debtor’s Motion for Entry of Order Approving Settlement*
3 *with Ruben Galindo, as Trustee of the Edward J. Bennett Trust, Pursuant to Fed. R. Bankr. P. 9019*
4 [Docket No. 1870] (the “Notice”). On April 2, 2025, the Motion, the Bardos Declaration, and the Notice
5 were served on the Core Service List, and on counsel for the Ruben Galindo as trustee of the Edward J.
6 Bennett Trust, as set forth in the *Certificate of Service* filed on April 4, 2025 [Docket No. 1879], in
7 compliance with the *Final Order Authorizing and Approving Special Noticing and Confidentiality*
8 *Procedures* [Docket No. 292].

9 As of this date, the undersigned has not received an answer, objection, or other responsive pleading
10 to the Motion and has reviewed the Court’s record and no answer, objection, or other responsive pleading
11 to the Motion appears. Pursuant to the Notice and B.L.R. 9014-1(c), objections to the Motion were to be
12 filed and served no later than April 16, 2025, pursuant to B.L.R. 9014-1(c), and no informal extension of
13 time to object has been provided.

14 It is hereby respectfully requested that the Order uploaded concurrently herewith be entered by the
15 Court, which is in substantially the form attached as Exhibit A to the Motion.

16
17 DATED: April 21, 2025

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21 /s/ Shane J. Moses
22 SHANE J. MOSES

23 *Counsel for the Debtor*
24 *and Debtor in Possession*