

Mark D. Plevin (State Bar No. 146278)
 PLEVIN & TURNER LLP
 580 California Street, 12th Floor
 San Francisco, California 94104
 (202) 580-6640
mplevin@plevinturner.com

Miranda H. Turner (admitted *pro hac vice*)
 Jordan A. Hess (admitted *pro hac vice*)
 PLEVIN & TURNER LLP
 1701 Pennsylvania Avenue, N.W., 2d Floor
 Washington, D.C. 20006
 (202) 580-6640
mtturner@plevinturner.com, jhess@plevinturner.com

Attorneys for Continental Casualty Company

**UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF CALIFORNIA**

In re:

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

Debtor.

Chapter 11

Bankruptcy Case No. 23-40523 WJL

**NOTICE OF APPEAL AND
 STATEMENT OF ELECTION**

Part I: Identify the appellant(s)

1. Name(s) of appellant(s): Continental Casualty Company
2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:

For appeals in an adversary proceeding

For appeals in a bankruptcy case

☐ Plaintiff

☐ Debtor

☐ Defendant

☐ Creditor

☐ Other (describe) _____

☐ Trustee

☒ Other (describe) Party in Interest

Part II: Identify the subject of this appeal

1. Describe the judgment – or the appealable order or decree – from which the appeal



is taken: Order Granting Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court [Dkt. No. 2168, Exhibit A hereto]

2. State the date in which the judgment – or the appealable order or decree – was entered: July 25, 2025

Part III: Identify the other parties to the appeal

List the names of all parties to the judgment — or appealable order or decree — from which the appeal is taken and the names, address, and telephone numbers of their attorneys:

Party	Attorneys
Official Committee of Unsecured Creditors	LOWENSTEIN SANDLER LLP Jeffrey D. Prol jprol@lowenstein.com Brent Weisenberg bweisenberg@lowenstein.com One Lowenstein Drive Roseland, New Jersey 07068 Telephone: (973) 597-2500 BURNS BAIR LLP Timothy W. Burns tburns@burnsbair.com Jesse J. Bair jbair@burnsbair.com 10 East Doty Street, Suite 600 Madison, Wisconsin 53703-3392 Telephone: (608) 286-2808 KELLER BENVENUTTI KIM LLP Tobias S. Keller tkeller@kbklp.com Jane Kim jkim@kbklp.com 101 Montgomery Street, Suite 1950 San Francisco, California 94104 Telephone: (415) 496-6723
The Roman Catholic Bishop of Oakland	FOLEY & LARDNER LLP Eileen R. Ridley Tel: (415) 438-6469; eridley@foley.com Shane J. Moses Tel: (415) 438-6404; smoses@foley.com Ann Marie Uetz

Party	Attorneys
	Tel: (313) 234-7114; auetz@foley.com Matthew D. Lee Tel: (608) 258-4203; mdlee@foley.com Geoffrey S. Goodman Tel: (312) 832-4515; ggoodman@foley.com Mark C. Moore Tel: (214) 999-4150; mmoore@foley.com 555 California Street, Suite 1700 San Francisco, California 94104-1520
Westport Insurance Corporation f/k/a Employers Reinsurance Corporation	SINNOTT, PUEBLA, CAMPAGNE & CURET, APLC Blaise S. Curet 2000 Powell Street, Suite 830 Emeryville, California 94608 Tel: (415) 352-6200 bcuret@spcclaw.com LAW OFFICE OF ROBIN CRAIG Robin D. Craig 6114 La Salle No. 517 Oakland, California 94611 Tel: (510) 549-3330 rdc@rcraiglaw.com PARKER, HUDSON, RAINER & DOBBS LLP Harris B. Winsberg Matthew M. Weiss Matthew G. Roberts 303 Peachtree St. NE, Suite 3600 Atlanta, Georgia 30308 Tel: (404) 523-5300 hwinsberg@phrd.com mweiss@phrd.com mroberts@phrd.com PARKER, HUDSON, RAINER & DOBBS LLP Todd C. Jacobs John E. Bucheit Two N. Riverside Plaza, Suite 1850 Chicago, Illinois 60606 Tel: (312) 477-3305 tjacobs@phrd.com

Party	Attorneys
	jbuchheit@phrd.com
London Market Insurers are Certain Underwriters at Lloyd's, London, subscribing severally and not jointly to Slip Nos. CU 1001 and K 60034 issued to the Roman Catholic Bishop of San Francisco, and Nos. K 78318 and CU 3061 issued to the Roman Catholic Bishop of Oakland; Catalina Worthing Insurance Ltd f/k/a HFPI (as Part VII transferee of Excess Insurance Co. Ltd.); the Ocean Marine Insurance Company Limited (as Part VII transferee of the World Auxiliary Insurance Corporation Limited); River Thames Insurance Company Limited; Dominion Insurance Company Limited; Companhia de Seguros Fidelidade- Mundial f/k/a Fidelidade Insurance Company of Lisbon; and R&Q Gamma Company Limited (as Part VII transferee of Anglo French Ltd.)	SKARZYNSKI MARICK & BLACK LLP Jeff D. Kahane Russell W. Roten Nathan Reinhardt Timothy W. Evanston 633 W. Fifth Street, 26th Floor Los Angeles, California 90071 Tel: (213) 721-0650 jkahane@skarzynski.com rroten@skarzynski.com nreinhardt@skarzynski.com tevanston@skarzynski.com SKARZYNSKI MARICK & BLACK LLP Ashley Storey One Battery Park Plaza, Fl. 32 New York, New York 10004 Tel: (212) 820-7700 astorey@skarzynski.com CLYDE & CO US LLP Catalina J. Sugayan Clinton E. Cameron Yongli Yang 30 S. Wacker Dr., Suite 2600 Chicago, Illinois 60606 Tel: (312) 635-7000 Catalina.Sugayan@clydeco.us Clinton.Cameron@clydeco.us Yongli.Yang@clydeco.us
Travelers Casualty & Surety Company f/k/a Aetna Casualty & Surety Company	DENTONS US LLP Laren Macksoud 1221 Avenue of the Americas New York, New York 10020 Tel: (212) 768-6800 lauren.macksoud@dentons.com DENTONS US LLP Andrew D. Telles Wyatt 4675 MacArthur Ct., Suite 1250 Newport Beach, California 92660

Party	Attorneys
	Tel: (949) 732-3738 andrew.wyatt@dentons.com
Pacific Indemnity Company, Insurance Company of North America, Pacific Employers Insurance Company, and Westchester Fire Insurance Company	O'MELVENY & MYERS LLP Tancred V. Schiavoni 1301 Avenue of the Americas New York, New York 10019 Tel: (212) 326-2000 tschiavoni@omm.com O'MELVENY & MYERS LLP Justine M. Daniels Alexandra J. Wolter 400 South Hope Street, Suite 1900 Los Angeles, California 90071 Tel: (213) 430-6000 jdaniels@omm.com awolter@omm.com CLYDE & CO US LLP Alexander Potente Jason J. Chorley 150 California Street, 15th Floor San Francisco, California 94111 Tel: (415) 365-9800 alex.potente@clydeco.us jason.chorley@clydeco.us
Claimants represented by the Zalkin Law Firm	THE ZALKIN LAW FIRM, LLP Devin M. Storey, dms@zalkin.com 10590 West Ocean Air Drive, Suite 175 San Diego, California 92130 Tel.: (858) 259-3011

Part IV: Optional election to have appeal heard by District Court

If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

X Appellant(s) elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

Part V: Sign below

Dated: August 11, 2025

By: /s/Mark D. Plevin

Mark D. Plevin
PLEVIN & TURNER LLP
580 California Street, Suite 1200
San Francisco, California 94104
(202) 580-6640
mplevin@plevinturner.com

Miranda H. Turner (admitted *pro hac vice*)
Jordan A. Hess (admitted *pro hac vice*)
PLEVIN & TURNER LLP
1701 Pennsylvania Avenue, N.W., 2d Floor
Washington, D.C. 20006
(202) 580-6640
mturner@plevinturner.com

Attorneys for Continental Casualty Company

EXHIBIT A

**LOWENSTEIN SANDLER LLP**JEFFREY D. PROL (*pro hac vice*)jprol@lowenstein.comBRENT WEISENBERG (*pro hac vice*)bweisenberg@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

The following constitutes the order of the Court.

Signed: July 25, 2025

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar

No. 151445)

tkeller@kbbkllp.com

JANE KIM (Cal. Bar No. 298192)

jkim@kbbkllp.comGABRIELLE L. ALBERT (Cal. Bar No.
190895)galbert@kbbkllp.com

101 Montgomery Street, Suite 1950

San Francisco, California 94104

Telephone: (415) 496-6723

William J. Lafferty, III

U.S. Bankruptcy Judge

BURNS BAIR LLPTIMOTHY W. BURNS (*pro hac vice*)tburns@burnsbair.comJESSE J. BAIR (*pro hac vice*)jbair@burnsbair.com

10 East Doty Street, Suite 600

Madison, Wisconsin 53703-3392

Telephone: (608) 286-2808

*Counsel for the Official Committee of
Unsecured Creditors*

**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

**ORDER GRANTING RENEWED
MOTION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS TO LIFT THE
AUTOMATIC STAY TO PERMIT
CERTAIN PLAINTIFFS' PERSONAL
INJURY CLAIMS TO PROCEED IN
STATE COURT**

1 Upon the *Renewed Motion of the Official Committee of Unsecured Creditors to Lift the*
2 *Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court* (the
3 "**Motion**") [Dkt. No. 2093];¹ the Court having reviewed the objections to the Motion filed by (i)
4 the Debtor [Dkt. No. 2112] (the "**Debtor Objection**"); (ii) Westport Insurance Corporation,
5 formerly known as Employers Reinsurance Corporation, Continental Casualty Company and
6 London Market Insurers ("**LMI**") [Dkt. No. 2115] (collectively, the "**Certain Insurers'**
7 **Objection**") and (iii) Insurance Company of North America, Westchester Fire Insurance
8 Company, Pacific Indemnity Company and Pacific Employers Insurance Company [Dkt. No.
9 2117] (the "**Pacific Objection**") and the joinder to the Pacific Objection filed by LMI [Dkt. No.
10 2120] (collectively with the Debtor Objection, the Certain Insurers' Objection and the Pacific
11 Objection, the "**Objections**"); the Court having reviewed the Committee's reply to the Objections
12 [Dkt. No. 2129] (the "**Reply**"); the Court having reviewed the Motion, the Objections and the
13 Reply and having considered the statements of counsel and the evidence adduced regarding the
14 Motion at a hearing before the Court on July 16, 2025 (the "**Hearing**"); the Court finding that (a)
15 the Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334, (b) venue is proper
16 in this district under 28 U.S.C. §§ 1408 and 1409, (c) this is a core proceeding under 28 U.S.C.
17 § 157(b)(2), and (d) notice of the Motion and the Hearing was sufficient under the circumstances;
18 and (e) the Court having determined that the legal and factual bases set forth in the Motion and at
19 the Hearing establish just cause for the relief granted;

20 **IT IS HEREBY ORDERED THAT:**

- 21 1. The Motion is GRANTED for the reasons set forth on the record at the Hearing.
- 22 2. The Objections are overruled.
- 23 3. The automatic stay is terminated to allow six State Court Actions to proceed, as
24 directed by the State Court.
- 25 4. The automatic stay shall remain in full force and effect for all other purposes
26 including with respect to the enforcement of any judgment against the Debtor that may be obtained
27 because of the termination of the automatic stay as provided above; *provided* that nothing herein
28

¹ Capitalized terms not defined herein have the meaning ascribed to them in the Motion.

1 shall prevent the entry of a judgment against the Debtor and/ or the initiation of proceedings
2 consistent with California Insurance Code Section 11580(b)(2) once a judgment is entered.

3 5. Notwithstanding Bankruptcy Rule 4001(a)(4), or any other Bankruptcy Rule, this
4 Order shall be immediately effective and enforceable upon its entry.

5 6. This Court shall retain exclusive jurisdiction over any matters arising from or
6 related to the implementation, interpretation or enforcement of this Order.

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8 ***END OF ORDER**
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Court Service List

All ECF Participants