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*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

**BANKRUPTCY LOCAL RULE 9014-1
CERTIFICATE OF NO OBJECTION
REGARDING DOCKET NO. 2185:
DEBTOR'S FIFTH MOTION FOR ENTRY
OF AN ORDER, PURSUANT TO
BANKRUPTCY RULES 9006 AND 9027,
ENLARGING THE PERIOD WITHIN
WHICH THE DEBTOR MAY REMOVE
ACTIONS PURSUANT TO 28 U.S.C. § 1452**

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 Fifth Motion for Entry of an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Enlarging the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452* [Docket No. 2185] (the "Motion"). On August 1, 2025, the Debtor filed the Motion, together with the

1 *Declaration of Attila Bardos in Support of Debtor's Fifth Motion for Entry of an Order, Pursuant to*
2 *Bankruptcy Rules 9006 and 9027, Enlarging the Period Within Which the Debtor May Remove Actions*
3 *Pursuant to 28 U.S.C. § 1452 [Docket No. 2186] (the "Bardos Declaration")*, and the *Notice of Hearing*
4 *on Debtor's Fifth Motion for Entry of an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Enlarging*
5 *the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452 [Docket No.*
6 *2187] (the "Notice").* On August 1, 2025, the Motion, the Bardos Declaration, and the Notice were served
7 on the Core Service List as set forth in the *Certificate of Service* filed on August 5, 2025 [Docket No.
8 2191], in compliance with the *Final Order Authorizing and Approving Special Noticing and*
9 *Confidentiality Procedures* [Docket No. 292].

10 As of this date, the undersigned has not received an answer, objection, or other responsive pleading
11 to the Motion and has reviewed the Court's record and no answer, objection, or other responsive pleading
12 to the Motion appears. Pursuant to the Notice and B.L.R. 9014-1(c), objections to the Motion were to be
13 filed and served no later than August 20, 2025, pursuant to B.L.R. 9014-1(c), and no informal extension
14 of time to object has been provided.

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

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18 DATED: August 22, 2025

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/s/ Shane J. Moses

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CERTIFICATE OF NO OBJECTION TO FIFTH MOTION TO EXTEND TIME TO REMOVE CIVIL ACTIONS

Case: 23-40523 Doc# 2246 Filed: 08/22/25 Entered: 08/22/25 07:28:51 Page 2 of 2