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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 WJL

Chapter 11

**STIPULATION TO EXTEND CERTAIN
DEADLINES IN CONNECTION WITH THE
DEBTOR'S MOTION FOR ENTRY OF AN
ORDER AUTHORIZING (A) THE RELEASE
OF THE DEBTOR'S INTERESTS IN
CATHOLIC CHURCH SUPPORT
SERVICES, INC. PURSUANT TO 11 U.S.C.
§§ 105 AND 363, AND (B) APPROVING
PLEDGE AGREEMENTS**

Judge: Hon. William J. Lafferty

INTRODUCTION

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”) and the Official Committee of Unsecured Creditors (the “Committee” and together with the



Debtor, the “Parties”) by and through their respective counsel of record, hereby stipulate and agree as follows.

RECITALS

A. On August 19, the Debtor filed *Motion for Entry of An Order Authorizing (A) The Release of The Debtor’s Interests in Catholic Church Support Services, Inc. Pursuant To 11 U.S.C. §§ 105 And 363, And (B) Approving Pledge Agreements* [Docket No. 2237] (the “Motion”).

B. The hearing on the Motion is set for September 9, 2025, at 10:00 a.m.

C. The Parties have agreed that the Committee may file any response to the Motion not later than September 4, 2025, and the Debtor may file any reply brief not later than September 8, 2025, at 5:00 p.m. Pacific Time.

STIPULATION

Based on the foregoing, the Parties hereby stipulate and agree as follows:

1. Any response by the Committee to the Motion may be filed not later than September 4, 2025.

2. Any reply by the Debtor to any such objection may be filed not later than September 8, 2025 at 12:00 p.m. Pacific Time.

3. The Parties request that the Court enter an order in the form attached hereto as Exhibit A approving this Stipulation.

[Signatures on following page]

STIPULATION

1 **SO STIPULATED:**

2 Dated: September 3, 2025

FOLEY & LARDNER LLP

3
4 /s/ Shan J. Moses
Shane J. Moses
Attorneys for the Debtor

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7 **SO STIPULATED:**

8 Dated: September 3, 2025

OFFICIAL COMMITTEE OF UNSECURED
9 CREDITORS

10 /s/ Brent Weisenberg
Jeffrey D. Prol
Brent Weisenberg

12 – and –

13 Tobias S. Keller
Jane Kim
Gabrielle L. Albert

15 Counsel for the Official Committee
16 of Unsecured Creditors

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STIPULATION

EXHIBIT A

FOLEY & LARDNER LLP

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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

**[PROPOSED] ORDER APPROVING
STIPULATION TO EXTEND CERTAIN
DEADLINES IN CONNECTION WITH THE
DEBTOR'S MOTION FOR ENTRY OF AN
ORDER AUTHORIZING (A) THE RELEASE
OF THE DEBTOR'S INTERESTS IN
CATHOLIC CHURCH SUPPORT
SERVICES, INC. PURSUANT TO 11 U.S.C.
§§ 105 AND 363, AND (B) APPROVING
PLEDGE AGREEMENTS**

Judge: Hon. William J. Lafferty

The Court having reviewed the *Stipulation to Extend Certain Deadlines in Connection With The Debtor's Motion For Entry Of An Order Authorizing (A) The Release Of The Debtor's Interests In Catholic Church Support Services, Inc. Pursuant To 11 U.S.C. §§ 105 And 363, And (B) Approving Pledge Agreements* [Docket No. ____] (the "Stipulation") entered into between the Roman Catholic Bishop of

Oakland, a California corporation sole, and the debtor and debtor in possession in the above-captioned chapter 11 bankruptcy case (the “Debtor”), and the Official Committee of Unsecured Creditors (the “Committee”); and after due consideration and good cause appearing,

IT IS HEREBY ORDERED THAT:

1. The Stipulation is Approved.
2. Any opposition or other response by the Committee to the Debtor’s *Motion for Entry of An Order Authorizing (A) The Release of The Debtor’s Interests in Catholic Church Support Services, Inc. Pursuant To 11 U.S.C. §§ 105 And 363, And (B) Approving Pledge Agreements* [Docket No. 2237] (the “Motion”) shall be timely if such response is filed not later than September 4, 2025.
3. Any reply brief by the Debtor to any such objection shall be timely if such reply is filed not later than September 8, 2025 at 12:00 p.m. Pacific Time.
4. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

****END OF ORDER****

COURT SERVICE LIST

All ECF Recipients.

[PROPOSED] ORDER APPROVING STIPULATION