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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

**DECLARATION OF SHANE J. MOSES IN
SUPPORT OF APPLICATION FOR ORDER
SHORTENING TIME FOR NOTICE OF
HEARING ON DEBTOR'S SIXTH MOTION
TO EXTEND DEADLINE TO ASSUME OR
REJECT UNEXPIRED LEASES OF
NONRESIDENTIAL REAL PROPERTY
PURSUANT TO SECTION 365(d)(4) OF THE
BANKRUPTCY CODE**

[No Hearing Required]

I, Shane J. Moses, hereby declare as follows:

1. I am an attorney admitted to practice in the States of California and New York, and before this Bankruptcy Court. I am of counsel with the law firm of Foley & Lardner LLP ("Foley"), and am one of the attorneys at Foley responsible for representation of the Roman Catholic Bishop of Oakland ("the Debtor") in this Bankruptcy Case. I make this Declaration in support of the concurrently filed *Application for Order Shortening Time for Notice of Hearing on Debtor's Sixth Motion to Extend Deadline to Assume*



1 *or Reject Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the*
2 *Bankruptcy Code (the “Application”).*

3 2. By the Application, the Debtor requests an order shortening time for notice on its *Debtor’s*
4 *Sixth Motion to Extend Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property*
5 *Pursuant to Section 365(d)(4) of the Bankruptcy Code (the “Motion”).*

6 3. The Motion relates to the agreement for the Debtor’s use of facilities and grounds in
7 Oakland owned by the Catholic Cathedral Corporation of the East Bay (“CCCEB”), which includes the
8 Cathedral of Christ the Light and the Debtor’s Chancery offices (the “Cathedral Lease”). I am informed
9 and believe that rejection of the Cathedral Lease would have a substantial negative effect on the Debtor
10 and its reorganization, as it provides both the most visible, landmark place of worship in the Diocese, and
11 the central chancery offices of the Debtor.

12 4. The Debtor’s current deadline to assume or reject the Cathedral Lease expires on October
13 1, 2025.

14 5. As set forth in the Motion, the Debtor believes that the Cathedral Lease should be addressed
15 through any confirmed plan of reorganization, as proposed in its currently pending Plan. The Debtor,
16 Committee, and the Debtor’s insurers are currently returning to mediation in a final attempt to reach and
17 consensual resolution. The Debtor has also filed a motion to dismiss the Chapter 11 Case, and will likely
18 seek dismissal of a consensual resolution is not reached. These circumstances necessitate a further
19 extension to preserve the status quo.

20 6. No previous requests have been made to shorten time with respect to the Motion.

21 7. There should be no adverse impact on the schedule for the case or proceeding if the Court
22 grants the Application. The lessor is not negatively affected, because it has consented to the relief
23 requested in the Motion.

24 8. Debtor’s counsel has communicated with the counsel for the Committee regarding the
25 request for a hearing on shortened time. I received confirmation by email from Attorney Brent
26 Weisenberg, counsel for the Committee, on September 18, 2025, that the Committee does not oppose the
27 shortening of notice as requested in the Application. Mr. Weisenberg also confirmed that the Committee
28

1 does not oppose the relief sought in the Motion, provided it is without prejudice to the rights, claims,
2 causes of action and/ or defenses the Committee may have regarding, arising out of or related to the
3 Cathedral Lease.

4 I declare under penalty of perjury under the laws of the United States of America that the foregoing
5 is true and correct to the best of my information, knowledge, and belief.

6 Executed on September 18, 2025, in Oakland California.

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8 /s/ Shane J. Moses

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DECL. OF S. MOSES ISO APPLICATION TO SHORTEN TIME