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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

**DEBTOR'S STATUS CONFERENCE
STATEMENT FOR BANKRUPTCY CASE**

Judge: Hon. William J. Lafferty

Status Conference:

Date: September 22, 2025

Time: 10:00 a.m.

Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

1 **TO THE HONORABLE WILLIAM J. LAFFERTY, UNITED STATES BANKRUPTCY JUDGE**
2 **AND ALL INTERESTED PARTIES AND/OR THEIR COUNSEL OF RECORD:**

3 The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor
4 in possession (the “Debtor”) in the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case”),
5 hereby files this status conference statement (this “Statement”) for the status conference in the Chapter 11
6 Case scheduled for September 22, 2025. More information regarding the current status of the Chapter 11
7 Case and previous developments are set forth in the Debtor’s earlier-filed status conference statements
8 [Dkt. Nos. 192, 320, 458, 520, 760, 843, 1373, 2291, and 2292] and the Debtor’s *Third Amended*
9 *Disclosure Statement for Debtor’s Third Amended Plan of Reorganization* [Dkt. No. 1874].

10 **A. The Debtor’s Motion To Dismiss**

11 On September 9, 2025, the Debtor filed *Debtor’s Motion to Dismiss Chapter 11 Case Pursuant to*
12 *11 U.S.C. § 1112(B)* [Dkt. No. 2293] (the “Motion to Dismiss”). The Debtor did not ask the Court to set
13 a briefing schedule on the Motion to Dismiss at the status conference of that same date. However, the
14 Debtor hereby requests the Court do so at the September 22 status conference.

15 Today the Official Committee of Unsecured Creditors (the “Committee”) filed its “Statement in
16 Support of the Debtor’s Motion to Dismiss.” It is not clear whether the Committee intends this “Statement”
17 to operate as its response to the Motion to Dismiss. Regardless, the Debtor requests the Court set the
18 following briefing schedule on the Motion to Dismiss:

19 Oppositions due: October 6, 2025

20 Replies due: October 20, 2025

21 Hearing held: October 29, 2025 (preferably in the afternoon so we have a special time set)

22 This schedule sets the opposition brief deadline 27 days (nearly 4 weeks) after the Motion to Dismiss was
23 filed, and 14 days from the date of the status conference, which is the amount of time required under the
24 Local Bankruptcy Rules. In addition, this schedule would clarify for all parties – before the next scheduled
25 global mediation begins – whether any parties oppose the Motion to Dismiss.

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28 STATUS CONFERENCE STATEMENT FOR SEPTEMBER 22, 2025

1 **B. The Need For Regular Mediation Sessions At This Critical Stage Of The Case**

2 As the Debtor stated at the September 9 status conference, the Debtor supports a global settlement
3 in this Chapter 11 Case, but any such settlement must be reached very, very soon. To that end, beginning
4 shortly after the September 9 status conference, the Debtor began communicating with Mediators – the
5 Hon. Christopher Sontchi (Ret.) and Attorney Tim Gallagher – to request a global in-person mediation
6 between the Debtor, the Committee, and the Insurers. The Debtor requested that the parties agree to
7 weekly mediation sessions until either the parties reach a global settlement or the Court rules on the
8 Motion to Dismiss.

9 As of this writing, Judge Sontchi and Mr. Gallagher have determined that the Debtor, Committee,
10 and Insurers will meet in Los Angeles, California, at the offices of The Gallagher Law Group, for full-
11 day, global mediation sessions on October 7 and 8, 2025. The Debtor has been informed that Tim
12 Gallagher has met/communicated with individual insurers and counsel for the Committee to try to make
13 progress toward settlement, and the Debtor has offered to attend any such meetings. The Debtor will
14 continue to press for a global settlement between now and the start of mediation October 7.

15 At the last status conference, this Court asked counsel for the Debtor what the Court might do to
16 help support settlement. The Debtor responds to that question more pointedly now, and suggests it would
17 be helpful for the Court to order all parties – the Debtor, the Insurers and the Committee – to a schedule
18 of in-person weekly meetings/mediation sessions at least once per week between now and October 27,
19 2025. The Debtor welcomes such meetings/mediation sessions to be scheduled on successive days to
20 maximize the time the parties all spend attempting to reach a consensual settlement. The Motion to
21 Dismiss calendar should remain pending during these weekly mediation sessions so the Court can decide
22 the Motion to Dismiss promptly in the event mediation is unsuccessful. If discussions are such that
23 continuing the hearing on the Motion to Dismiss is prudent or warranted, the parties or the Mediators can
24 address a continuance with the Court as necessary.

25 **C. The Debtor's Motion To Extend The Deadline For Rejecting The CCCEB Lease**

26 On September 18, 2025, the Debtor filed *Debtor's Sixth Motion to Extend Deadline to Assume or*
27 *Reject Unexpired Lease of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy*
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STATUS CONFERENCE STATEMENT FOR SEPTEMBER 22, 2025

1 *Code* (the “Extension Motion”). The Extension Motion requests the Court re-set the deadline under 11
2 U.S.C. § 365(d)(4) for assuming or rejecting the Debtor’s unexpired, nonresidential real property lease
3 (the “Cathedral Lease”) with Catholic Cathedral Corporation of the East Bay (“CCCEB”), from whom the
4 Debtor rents the Cathedral of Christ the Light, the Debtor’s Chancery offices, the Bishop of Oakland’s
5 residence, and other real property. The current deadline for assuming the Cathedral Lease is October 1,
6 2025. In the Extension Motion, the Debtor requests the deadline be extended to April 1, 2026. The
7 Committee does not oppose this relief, provided it is without prejudice to the rights, claims, causes of
8 action, and/or defenses the Committee may have regarding, arising out of, or related to the Cathedral
9 Lease. The Debtor has further requested the Extension Motion be heard on shortened notice. The
10 Committee does not oppose that relief, either.

11 **D. Professional Fee Applications And Interim Compensation**

12 The next set of Interim Fee Applications for retained professionals will be filed on or before
13 October 15, 2025, for the period of May 1, 2025 – August 31, 2025. Pursuant to the *Agreed Order*
14 *Amending Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt.
15 No. 2101] (the “Amended Interim Compensation Order”), the hearing on these Interim Fee Applications
16 will be set not later than December 5, 2025. The Debtor has confirmed with the Fee Examiner that this
17 schedule will provide adequate time for his review of the next round of Interim Fee Applications.

18 The Amended Interim Compensation Order increased the monthly holdback amount for fees
19 incurred by Professionals in the case from 20% to 30%. However, this arrangement will soon end. The
20 Debtor estimates it will run out of cash sufficient to pay professional fees in the near term and is thus
21 considering a further motion to amend the Interim Compensation Procedures.

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1 DATED: September 19, 2025

Respectfully submitted,

2 **FOLEY & LARDNER LLP**

3 Eileen R. Ridley

4 Shane J. Moses

Ann Marie Uetz

Matthew D. Lee

5 Geoffrey S. Goodman

6 Mark C. Moore

7 /s/ Shane J. Moses

SHANE J. MOSES

8 *Counsel for the Debtor*

9 *and Debtor in Possession*

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