

**FOLEY & LARDNER LLP**

Eileen R. Ridley (CA Bar No. 151735)

Tel: (415) 438-6469; [eridley@foley.com](mailto:eridley@foley.com)

Shane J. Moses (CA Bar No. 250533)

Tel: (415) 438-6404; [smoses@foley.com](mailto:smoses@foley.com)Ann Marie Uetz (admitted *pro hac vice*)Tel: (313) 234-7114; [auetz@foley.com](mailto:auetz@foley.com)Matthew D. Lee (admitted *pro hac vice*)Tel: (608) 258-4203; [mdlee@foley.com](mailto:mdlee@foley.com)Geoffrey S. Goodman (admitted *pro hac vice*)Tel: (312) 832-4515; [ggoodman@foley.com](mailto:ggoodman@foley.com)Mark C. Moore (admitted *pro hac vice*)Tel: (214) 999-4150; [mmoore@foley.com](mailto:mmoore@foley.com)

One Market Plaza

55 Spear Street Tower, Suite 1900

San Francisco, CA 94105

*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. 2325:  
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**

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 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* [Docket No. 2325] (the "Motion"). On September 18, 2025, the Debtor filed the

1 *Attila Bardos in Support of Debtor's Sixth Motion to Extend Deadline to Assume or Reject Unexpired*  
2 *Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code* [Docket  
3 No. 2326] (the "Bardos Declaration"), the *Application for Order Shortening Time for Notice of Hearing*  
4 *on Debtor's Sixth Motion to Extend Deadline to Assume or Reject Unexpired Leases of Nonresidential*  
5 *Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code* [Docket No. 2327] (the  
6 "Application"), and the *Declaration of Shane J. Moses in Support of Application for Order Shortening*  
7 *Time for Notice of Hearing on Debtor's Sixth Motion to Extend Deadline to Assume or Reject Unexpired*  
8 *Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code* [Docket  
9 No. 2328] (the "Moses Declaration"). On September 18, 2025, the Motion, the Bardos Declaration, the  
10 Application and the Moses Declaration were served on the Core Service List and on the Catholic Cathedral  
11 Corporation of the East Bay, as set forth in the *Certificate of Service* filed on September 23, 2025 [Docket  
12 No. 2341], in compliance with the *Final Order Authorizing and Approving Special Noticing and*  
13 *Confidentiality Procedures* [Docket No. 292].

14 On September 18, 2025, the Court entered the *Order Shortening Time for Notice of Hearing on*  
15 *Debtor's Sixth Motion to Extend Deadline to Assume or Reject Unexpired Leases of Nonresidential Real*  
16 *Property Pursuant to Section 365(d)(4) of the Bankruptcy Code* [Docket No. 2334] (the "Order Shortening  
17 Time"), shortening time for notice of the Motion. Pursuant to the Order Shortening Time, any opposition  
18 to the Motion was required to be made in writing filed with the Court and served on Debtor's counsel not  
19 later than September 26, 2025. On September 22, 2025, in compliance with the Order Shortening Time, a  
20 notice of hearing on the Motion [Docket No. 2337] and the Order Shortening Time were served on the  
21 Core Service List and on the Catholic Cathedral Corporation of the East Bay, as set forth in the *Certificate*  
22 *of Service* filed on September 24, 2025 [Docket No. 2344], in compliance with the *Final Order*  
23 *Authorizing and Approving Special Noticing and Confidentiality Procedures* [Docket No. 292].

24 As of this date, the undersigned has not received an answer, objection, or other responsive pleading  
25 to the Motion and has reviewed the Court's record and no answer, objection, or other responsive pleading  
26 to the Motion appears. Pursuant to the Notice and B.L.R. 9014-1(c), objections to the Motion were to be  
27  
28

CERTIFICATE OF NO OBJECTION TO SIXTH MOTION TO EXTEND DEADLINE RE: CCCEB LEASE

1 filed and served no later than September 26, 2025, pursuant to B.L.R. 9014-1(c), and no informal extension  
2 of time to object has been provided.

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

5  
6 DATED: September 29, 2025

**FOLEY & LARDNER LLP**

Thomas F. Carlucci

Shane J. Moses

Ann Marie Uetz

Matthew D. Lee

Geoffrey S. Goodman

Mark C. Moore

/s/ Shane J. Moses

SHANE J. MOSES

*Counsel for the Debtor  
and Debtor in Possession*