

**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 (*pro hac vice* requested)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 WJL

Chapter 11

**DECLARATION OF ERIC KAUP  
IN SUPPORT OF FIRST INTERIM FEE  
APPLICATION OF HILCO REAL ESTATE,  
LLC AS REAL ESTATE CONSULTANT  
FOR ALLOWANCE AND PAYMENT OF  
COMPENSATION FOR THE PERIOD OF  
JANUARY 21, 2025 THROUGH AUGUST 31,  
2025**

Judge: Hon. William J. Lafferty

Date: December 3, 2025

Time: 10:30 a.m.

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

Objection Deadline: November 5, 2025

1 I, Eric W. Kaup, do hereby declare as follows:

2 The following facts are personally known to me, and if called to do so, I could and would  
3 competently testify thereto.

4 1. I am an Executive Director, Chief Commercial Officer, and Special Counsel of Hilco  
5 Trading, LLC, the parent company of Hilco Real Estate, LLC ("Hilco"), which has been retained as real  
6 estate consultant for the Debtor.

7 2. I submit this declaration in Support of the *First Interim Fee Application of Hilco Real*  
8 *Estate, LLC as Real Estate Consultant for Allowance and Payment of Compensation For the Period of*  
9 *January 21, 2025 Through August 31, 2025* (the "Interim Application").

10 3. I have personally reviewed the information contained in the Interim Application, and  
11 believe its contents to be true and correct to the best of my knowledge, information and belief.

12 4. Hilco does not charge for photocopying expenses, print jobs, or scanned copies.

13 5. Hilco does not charge for local or long-distance telephone calls placed by consultants from  
14 their offices.

15 6. Hilco bills for expenses charged by outside vendors and travel expenses in the actual  
16 amount charged to Hilco for such expenses.

17 7. Hilco has not been paid or promised any compensation from any source for services  
18 rendered in connection with this case, other than the Debtor's funds.

19 8. Hilco has not entered into any agreement or understanding with any other entity for the  
20 sharing of compensation received or to be received for services rendered and/or to be rendered in  
21 connection with this case.

22 9. Hilco believes that the compensation sought in the Interim Application is in conformity  
23 with the *United States Bankruptcy Court Northern District of California Guidelines for Compensation*  
24 *and Expense Reimbursement of Professionals and Trustees*, except to the extent that certain of the monthly  
25 billings are for amounts in excess of \$20,000 per category. Because Hilco's work involves substantially  
26 similar issues, Hilco has not attempted to break the work into subcategories. Given the size and complexity  
27 of this case, Hilco submits that limiting each category to \$20,000 is not practicable.

28 DECLARATION OF ANN MARIE UETZ IN SUPPORT OF FOLEY SEVENTH INTERIM FEE APPLICATION

1           10.     As made clear in the Interim Application, the compensation sought therein were billed at  
2 rates no less favorable than those customarily billed by Hilco and generally accepted by Hilco's clients.  
3 This includes the flat fee charge of \$150,000.00 for certain appraisal work as reflected in the Interim  
4 Application, which was billed at rates not less favorable than customarily billed by Hilco for commercial  
5 real estate appraisal.

6           11.     I have personally reviewed the bills in this matter, and the bills represent true and correct  
7 charges to the best of my knowledge, information and belief.

8           Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
9 correct.

10          Executed this 15<sup>th</sup> day of October, 2025.

11  
12  
13                                 /s/ Eric W. Kaup  
14                                 Eric W. Kaup  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DECLARATION OF ANN MARIE UETZ IN SUPPORT OF FOLEY SEVENTH INTERIM FEE APPLICATION