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 9 Employers Insurance Company, Insurance Company of
 10 North America, and Westchester Fire Insurance
 Company*

11 **UNITED STATES BANKRUPTCY COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

13 In re:

14 THE ROMAN CATHOLIC BISHOP OF
 15 OAKLAND, a California corporation sole,
 Debtor.

Case No. 4:23-bk-40523-WJL

Chapter 11

**REQUEST FOR LEAVE TO WITHDRAW
 APPEARANCE ON BEHALF OF
 PACIFIC INSURERS**

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 20 Pursuant to Local Bankruptcy Rule 1001-2(a) and Rule 11-5(a) of the Local Rules of the
 21 U.S. District Court for the Northern District of California, Justine M. Daniels (the "Movant"),
 22 seeks leave to withdraw as counsel for Pacific Indemnity Company and Century Indemnity
 23 Company, as successor to CCI Insurance Company, as successor to Insurance Company of
 24 North America, Pacific Employers Insurance Company, and Westchester Fire Insurance
 25 Company (together, "Pacific Insurers"). In support of this motion, Movant states as follows:

26 1. Effective November 4, 2025, Ms. Daniels is no longer with the firm of O'Melveny &
 27 Myers LLP and has therefore ceased to be involved with this case.

28 2. Tancred V. Schiavoni and Alexandra Wolter, who are both with O'Melveny &

1 Myers LLP, will continue to represent the Pacific Insurers as counsel of record.

2 WHEREFORE, the Movant (a) seeks leave to withdraw, (b) requests entry of an order
3 granting this motion, and (c) requests such other and further relief as may be just and proper.
4

5 Respectfully submitted,

6
7 Dated: December 4, 2025

By: /s/ Alexandra Wolter

8 **O'MELVENY & MYERS LLP**

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing was filed electronically on this 4th day of December 2025, which will send notification of such filing to those attorneys of record registered on the CM/ECF system.

By: /s/ Alexandra Wolter

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8 *Attorneys for Pacific Indemnity Company, Pacific*
9 *Employers Insurance Company, Insurance Company of*
10 *North America, and Westchester Fire Insurance*
11 *Company*

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 In re:

15 THE ROMAN CATHOLIC BISHOP OF
16 OAKLAND, a California corporation sole,
17 Debtor.

Case No. 4:23-bk-40523-WJL

Chapter 11

**[PROPOSED] ORDER GRANTING
REQUEST FOR LEAVE TO WITHDRAW
APPEARANCE ON BEHALF OF
PACIFIC INSURERS**

18 Upon consideration of Pacific Indemnity Company and Century Indemnity Company, as
19 successor to CCI Insurance Company, as successor to Insurance Company of North America,
20 Pacific Employers Insurance Company, and Westchester Fire Insurance Company (together,
21 "Pacific Insurers")'s Request For Leave To Withdraw Appearance On Behalf Of Pacific Insurers,
22 and with good cause shown,

23 **IT IS HEREBY ORDERED THAT:**

24 1. The Request for Leave to Withdraw Appearances on behalf of Justine M. Daniels is
25 granted.

26 ****END OF ORDER****

27 [PROPOSED] ORDER
28 CASE NO. 4:23-BK-40523

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APPROVED AS TO FORM:

By: /s/ Alexandra Wolter

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All ECF Recipients.

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