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Special Insurance Counsel for the Debtor

UNITED STATES DISTRICT COURT

FOR THE 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

CERTIFICATE OF NO OBJECTION TO INITIAL MONTHLY FEE STATEMENT OF COVINGTON & BURLING LLP, AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF OCTOBER 7, 2025 THROUGH OCTOBER 31, 2025

Judge: Hon. William J. Lafferty

On December 1, 2025, Covington & Burling LLP (the "Applicant" or "Covington"), special insurance counsel for 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"), filed its *Initial Monthly Fee Statement of Covington & Burling LLP*, as Special Insurance Counsel for the Debtor, for Allowance of Compensation

and Reimbursement of Expenses for the Period of October 7, 2025 through October 31, 2025 [Docket No. 2477] (the "Monthly Fee Statement"), pursuant to the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 170] (the "Original Compensation Procedures Order") and the Agreed Order Amending Procedures for Interim Compensation and Reimbursement of Expenses of Professionals on June 27, 2025 [Dkt. No 2101] (the "Amended Compensation Procedures Order" and together with the Original Compensation Procedures Order, the "Compensation Procedures Orders").

The Monthly Fee Statement was filed and served on December 1, 2025 via email pursuant to the terms of the Compensation Procedures Orders, on the Notice Parties (as defined therein).

The deadline for each Notice Party to file any objection to the Monthly Fee Statement was December 11, 2025 under the Compensation Procedures Orders. No objections to the Monthly Fee Statement have been filed with the Court or received by the Applicant as of the date hereof. Pursuant to the Compensation Procedures Orders, the Debtor is authorized to pay the Applicant eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the Monthly Fee Statement without need of a further order of the Court.

DECLARATION OF NO OBJECTION

The undersigned hereby declares as follows:

- 1. I am an attorney with the firm of Covington & Burling LLP, special insurance counsel to the Debtor in this Chapter 11 Case.
- 2. I certify that to the best of my knowledge no objection or response has been received by Applicant, and that I have reviewed the Court's docket in this Chapter 11 Case and no objection or response to the Monthly Fee Statement has been filed.

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