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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re: THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole, Debtor.	Bankruptcy Case No. 23-40523 WJL Chapter 11 **STIPULATION TO EXTEND CERTAIN INSURERS' DEADLINE TO OBJECT TO DEBTOR'S MODIFIED FOURTH AMENDED PLAN** Hearing Date: June 15, 2026 Time: 9:00 a.m. Pacific Time Place: U.S. Bankruptcy Court 1300 Clay Street, Courtroom 220 Oakland, California 94612

This stipulation (this "Stipulation") is entered into by and between The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case"), and Westport Insurance Corporation f/k/a Employers Reinsurance Corporation ("Westport"); Certain

Underwriters at Lloyd's, London and Certain London Market Insurance Companies ("LMI");[1] Continental Casualty Company ("Continental"); Travelers Casualty and Surety Company f/k/a Aetna Casualty & Surety Company ("Travelers"); and Insurance Company of North America, Westchester Fire Insurance Company, Pacific Indemnity Company, and Pacific Employes Insurance Company ("INA" and collectively with Westport, LMI, Continental, and Travelers, the "Certain Insurers"). The Debtor and the Certain Insurers are referred to herein collectively as the "Parties". The Parties, by and through their respective counsel of record, hereby stipulate and agree as follows:

RECITALS

A. On March 27, 2026, the Debtor filed its *Modified Fourth Amended Plan of Reorganization* (Dkt. 2758) (the "Plan").

B. On April 6, 2026, the Court entered its *Confirmation Scheduling Order* (Dkt. 2790) which set the deadline to object to the Debtor's Plan as May 8, 2026.

C. On April 6, 2026, the Certain Insurers served the Debtor with their *First Set of Interrogatories to the Roman Catholic Bishop of Oakland* and their *First Requests for Production of Documents to The Roman Catholic Bishop of Oakland*.

D. On April 6, 2026, INA served its *First Requests for Production of Documents to the Roman Catholic Bishop of Oakland*.

E. On April 13, 2026, the Debtor served its *Responses to Certain Insurers' First Set of Interrogatories to the Roman Catholic Bishop of Oakland* and its *Responses to Certain Insurers' First Requests for Production of Documents to The Roman Catholic Bishop of Oakland*

[1] LMI are Certain Underwriters at Lloyd's, London, subscribing severally and not jointly to Slip Nos. CU 1001 and K 60034 issued to the Roman Catholic Bishop of San Francisco, and Nos. K 78318 and CU 3061 issued to the Roman Catholic Bishop of Oakland; Catalina Worthing Insurance Ltd f/k/a HFPI (as Part VII transferee of Excess Insurance Co. Ltd.); the Ocean Marine Insurance Company Limited (as Part VII transferee of the World Auxiliary Insurance Corporation Limited); River Thames Insurance Company Limited; Dominion Insurance Company Limited; Companhia de Seguros Fidelidade-Mundial f/k/a Fidelidade Insurance Company of Lisbon; and R&Q Gamma Company Limited (as Part VII transferee of Anglo French Ltd.).

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(collectively, the "Discovery Responses").

F. On April 15, 2026, the Debtor served its *Supplemental Responses to Certain Insurers' First Set of Interrogatories to the Roman Catholic Bishop of Oakland* and its *Supplemental Responses to Certain Insurers' First Requests for Production of Documents to the Roman Catholic Bishop of Oakland* (collectively, the "Supplemental Discovery Responses").

G. On April 20, 2026, Westport, Continental, LMI, and Travelers served the Debtor with a *Notice of Deposition Upon Oral Examination of Designated Representative(s) of the Roman Catholic Bishop of Oakland* (the "Deposition Notice").

H. On April 29, 2026, INA served its *Joinder In and Notice of Deposition of Designated Representative(s) of the Roman Catholic Bishop of Oakland*.

I. On April 23 and April 30, 2026, the Parties met and conferred regarding the Debtor's Discovery Responses and Supplemental Discovery Responses and the topics identified by Westport, Continental, LMI, and Travelers in their Deposition Notice.

J. Pursuant to the Confirmation Scheduling Order, the deadline for substantial completion of fact discovery was April 30, 2026. However, because the Parties continued and are continuing to meet and confer regarding the Discovery Responses and the Supplemental Discovery Responses, the Diocese agreed to and did make its 30(b)(6) representative available to be deposed on May 6, 2026 at 9:00 AM Pacific Time for a deposition.

K. Because the Debtor's 30(b)(6) deposition did not occur until May 6, 2026, which is two days before the deadline to object to the Debtor's Plan, the Certain Insurers have requested, and the Debtor has agreed, to extend the Certain Insurers' deadline to object to the Plan through and including May 13, 2026.

L. Pursuant to the Confirmation Scheduling Order, deadlines contained therein "may be amended only by mutual agreement of the parties and approval of the Court, or upon good cause shown after notice and a hearing." (Dkt. 2790, p. 4 of 5.)

STIPULATION

Wherefore, the Parties hereby stipulate and agree as follows, subject to approval of the

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Court.

1. The Certain Insurers' deadline to object to the Plan is extended through and including May 13, 2026.

2. The Parties request that the Court enter an order in the form attached hereto as **Exhibit A** approving this Stipulation and extending the Certain Insurers' deadline to object to the Debtor's Plan.

[*Signatures on following page*]

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Respectfully submitted: May 7, 2026

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EXHIBIT A

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re: THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole, Debtor.	Bankruptcy Case No. 23-40523 WJL Chapter 11 **ORDER APPROVING STIPULATION TO EXTEND CERTAIN INSURERS' DEADLINE TO OBJECT TO DEBTOR'S MODIFIED FOURTH AMENDED PLAN** Hearing Date: June 15, 2026 Time: 9:00 a.m. Pacific Time Place: U.S. Bankruptcy Court 1300 Clay Street, Courtroom 220 Oakland, California 94612

The Court having reviewed the *Stipulation to Extend Certain Insurers' Deadline to Object*

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to Debtor's Modified Fourth Amended Plan [Docket No. _____] (the "Stipulation")[2] entered into between The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor") in the above-captioned Chapter 11 bankruptcy case (the "Chapter 11 Case") and the Certain Insurers (the "Parties"); and after due consideration and good cause appearing,

IT IS HEREBY ORDERED THAT:

1. The Stipulation is approved.

2. The Certain Insurers' deadline to object to the Debtor's Modified Fourth Amended Plan is extended through and including May 13, 2026.

3. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

END OF ORDER

[2] Terms defined in the Stipulation shall have the same meaning herein.

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COURT SERVICE LIST

All ECF Recipients.

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