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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 Judge: Hon. William J. Lafferty ***EX PARTE* APPLICATION FOR ORDER PURSUANT TO B.L.R. 9013-1(c) AUTHORIZING OVERSIZE BRIEFING FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' OBJECTION TO CONFIRMATION OF THE DEBTOR'S MODIFIED FOURTH AMENDED PLAN OF REORGANIZATION** [No Hearing Requested]

The Official Committee of Unsecured Creditors (the "**Committee**") of the Roman Catholic Bishop of Oakland (the "**Debtor**") submits this *ex parte* application (the "**Application**") for an order, pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California (the "**Bankruptcy Local Rules**"), authorizing the Committee to file an oversized brief in connection with *The Official Committee of Unsecured Creditors' Objection to Confirmation of the Debtor's Modified Fourth Amended Plan of Reorganization* (the "**Objection**"), filed concurrently herewith.

I. JURISDICTION AND VENUE

The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory basis for this Application is Bankruptcy Local Rule 9013-1(c).

II. BACKGROUND

On May 8, 2023, the Debtor filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "**Bankruptcy Code**").

On March 29, 2026, the Debtor filed the *Debtor's Modified Fourth Amended Plan of Reorganization Dated March 27, 2026* [Dkt No. 2758] (the "**Diocese Plan**").

On April 6, 2026, the Court entered the *Confirmation Scheduling Order* [Dkt. No. 2790] setting dates and deadlines in connection with the proceedings related to solicitation and confirmation of the Diocese Plan.

The Committee is filing the Objection along with this Application.

III. OVERSIZED BRIEFING FOR THE OBJECTION IS WARRANTED

Bankruptcy Local Rule 9013-1(c) provides that, "Unless the Court expressly orders otherwise, the initial and response memoranda of points and authorities shall not exceed 25 pages of text, and reply memorandum shall not exceed 15 pages of text." B.L.R. 9013-1(c).

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By this Application, the Committee requests entry of an order, substantially in the form attached hereto as **Exhibit A**, granting it leave to file the Objection in a length of up to 45 pages, exceeding the 25-page limit set forth in Bankruptcy Local Rule 9013-1(c).

Good cause exists to grant the limited relief requested herein. The issues that must be addressed in connection with confirmation of the Diocese Plan present numerous and substantial issues of law that cannot be adequately addressed within the 25-page limit. Among other things, the Objection must address whether the Debtor has satisfied each of the section 1129 standards for confirmation, with particular focus on the best interests test, whether the Diocese Plan is fair and equitable, and whether the Debtor can establish that the Diocese Plan is filed in good faith. Each of these issues involves complex questions of statutory interpretation and case law that require careful analysis.

The Committee has endeavored to draft the Objection as concisely as possible. Notwithstanding those efforts, the number, complexity, and significance of the legal issues that must be discussed render it impracticable to fully and fairly address the Diocese Plan within the page limitation prescribed by the Bankruptcy Local Rules.

Granting the requested relief will assist the Court in its consideration of the Diocese Plan by permitting the Committee to present its arguments and supporting authorities in a complete and coherent manner. No party in interest will be prejudiced by the limited additional pages requested, particularly given that any responding party may seek comparable relief.

IV. NOTICE

Notice of this Application will be provided to (i) the Debtor, (ii) the Office of the United States Trustee for Region 17; (iii) those persons who have formally appeared in this chapter 11 case and requested service pursuant to Bankruptcy Rule 2002, and (iv) all other parties entitled to notice in this proceeding. The Committee respectfully submit that no further notice is required.

No previous request for the relief sought herein has been made by the Committee to this or any other court.

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WHEREFORE, the Committee requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting this Application and such other and further relief as the Court may deem just and appropriate.

Dated: May 8, 2026

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP
BURNS BAIR LLP

By: */s/ Gabrielle L. Albert*
Tobias S. Keller
Jane Kim
Gabrielle L. Albert

- and –

Jeffrey D. Prol
Brent Weisenberg

- and –

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Counsel for the Official Committee of Unsecured Creditors

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Exhibit A

(Proposed Order)

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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 Judge: Hon. William J. Lafferty **[PROPOSED] ORDER PURSUANT TO B.L.R. 9013-1(c) AUTHORIZING OVERSIZE BRIEFING FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' OBJECTION TO CONFIRMATION OF THE DEBTOR'S MODIFIED FOURTH AMENDED PLAN OF RERGANIZATION** [No Hearing Requested]

Upon the *ex parte* application dated May 8, 2026 (the "**Application**"), of the Official Committee of Unsecured Creditors (the "**Committee**") of the Roman Catholic Bishop of Oakland (the "**Debtor**") in the above-captioned chapter 11 case, pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, authorizing the Committee to file an oversized brief in connection with *The Official Committee of Unsecured Creditors' Objection to Confirmation of the Debtor's Modified Fourth Amended Plan of Reorganization* (the "**Objection**"); and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is granted as provided herein.

2. The Committee is authorized to file and serve the Objection in excess of 25 pages, but not to exceed 35 pages (exclusive of any schedules or exhibits thereto and/or any declarations filed in connection therewith).

3. The Court shall retain jurisdiction to resolve any disputes or controversies arising from this Order.

** END OF ORDER **

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