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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

DECLARATION OF BRENT WEISENBERG IN SUPPORT OF *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]

I, Brent Weisenberg, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at the law firm of Lowenstein Sandler LLP, counsel to the Official Committee of Unsecured Creditors (the "**Committee**") in connection with the above-referenced chapter 11 case.

2. I submit this declaration in support of the *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* (the "**Objection**").

3. The facts set forth in this declaration are personally known to me, and, if called as a witness, I could and would competently testify thereto.

4. 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.

5. 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.

6. Therefore, the Committee requests authority for the Objection to exceed the 25 pages allowed under Bankruptcy Local Rule 9013-1(c).

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct. Executed on May 8, 2026.

/s/ Brent Weisenberg
Brent Weisenberg

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