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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 Chapter 11 **DEBTOR'S COMBINED RESPONSE TO MULTIPLE *EX PARTE* APPLICATIONS** Judge: Hon. William J. Lafferty

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"), hereby files this combined response (this "Response") to the multiple *ex parte* applications (together, the "Applications") seeking leave for over-length briefs in objection to confirmation of the Debtor's Modified Fourth Amended Plan of Reorganization (the "Plan"), filed by Certain Insurers [Docket No. 2952], the Pacific Insurers [Docket No. 2963],[1] and the Official Committee of Unsecured Creditors [Docket No.

[1] Filed as a joinder to the Certain Insurers' Application.

2913].

Before seeking *ex parte* relief from this Court, **none** of the Certain Insurers, the Pacific Insurers, or the Committee sought to meet and confer with the Debtor prior to filing their respective Applications. Indeed, none of these parties made any effort whatsoever to communicate with or to notify the Debtor about the request for additional pages before filing for *ex parte* relief with this Court. That is just poor professional practice and thus the Debtor now files this response.

The Debtor does not object to reasonable enlargement of page limits for objections to the Plan, provided that the Debtor is given equivalent additional pages to respond to the arguments of each of the objecting parties. The Debtor does, however, object to *ex parte* relief being sought without making any effort to meet and confer in advance, where there was no exigency that would have prevented seeking the Debtor's consent. To the extent the Court grants the remaining Applications,[2] the Debtor respectfully requests that the Court again caution the moving parties to meet and confer where possible in the future prior to seeking *ex parte* relief.

DATED: May 14, 2026

Respectfully submitted,

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[2] The Debtor recognizes that the Committee Application was granted by order entered on May 8, 2026.