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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 ***EX PARTE* APPLICATION FOR ORDER PURSUANT TO B.L.R. 9013-1(C) AUTHORIZING OVERSIZE BRIEFING FOR DEBTOR'S MEMORANDUM OF LAW IN SUPPORT OF CONFIRMATION OF DEBTOR'S MODIFIED FOURTH AMENDED PLAN OF REORGANIZATION** [No Hearing Requested]

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"), hereby submits this *ex parte* application (the "Application") for an order, pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the Northern District of California (the "Bankruptcy Local Rules" or "B.L.R."), authorizing the Debtor to file an oversized brief in connection

with confirmation of Debtor's Modified Fourth Amended Plan of Reorganization (the "Confirmation Brief"), filed concurrently herewith, and respectfully represents as follows:

I. RELIEF REQUESTED

Bankruptcy Local Rule 9013-1(c) limits the length of briefs and legal memoranda to 25 pages of text unless the Court expressly orders otherwise. Therefore, the Debtor respectfully requests leave to file an oversized Confirmation Brief not to exceed 80 pages.

II. 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 bases for the relief requested in this Application are 11 U.S.C. § 105(a) and Bankruptcy Local Rule 9013-1(c).

III. BACKGROUND

On May 8, 2023 (the "Petition Date"), the Debtor filed a voluntary petition for chapter 11 bankruptcy relief under the Bankruptcy Code. The Debtor continues to operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in this Chapter 11 Case.

On May 23, 2023, the U.S. Trustee appointed the Official Committee of Unsecured Creditors (the "Committee").

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

The Court approved a schedule for discovery and briefing leading up to a confirmation hearing on the Plan, which is to commence on June 15, 2026 (the "Confirmation Hearing"). This schedule was memorialized in an order entered on April 6, 2026 [Docket No. 2790] (the "Scheduling Order").

Seven objections and one supplemental objection were filed opposing confirmation of the Plan, totaling approximately 145 pages.

Pursuant to the Scheduling Order, the Confirmation Brief is due on June 5, 2026.

IV. GROUNDS FOR EXTENDING PAGE LIMITS FOR BRIEFING

Under B.L.R. 9013-1(c), the Court may enter an order permitting the filing of a brief or memorandum in excess of 25 pages. The Debtor has worked diligently to prepare its Confirmation Brief but given the breadth of issues that need to be addressed, it is simply not possible for the Debtor to adequately address all relevant information within the 25-page limit set by B.L.R. 9013-1(c). In addition to setting forth the basis for confirmation under Section 1129 of the Bankruptcy Code, the Debtor is responding in its single confirmation brief to the approximately 145 pages of objection filed in eight separate objections by the Committee, Insurers, and the US Trustee.[1]

The Debtor has made a concerted effort to limit the total length of its Confirmation Brief to comport with the Bankruptcy Local Rules. Notwithstanding these efforts, the Debtor has determined that it is impossible for them to fully and adequately address the legal and factual issues relevant to confirmation of the Plan and response to the many objections within the 25-page limit required under B.L.R. 9013-1(c).

Consequently, granting the relief requested in this Application – relaxing the current page constraint imposed by the Bankruptcy Local Rules on the Confirmation Brief – will allow the Debtor to present a thorough and comprehensive analysis of all issues relevant to confirmation. No party in interest will be prejudiced by the limited additional pages requested, particularly given that any responding party may seek comparable relief.

In advance of filing this Application, the Debtor contacted all other parties regarding the relief sought. The Committee has indicated that it does not oppose the relief requested in this Application. Additionally, at approximately 6:34 a.m. on Thursday, June 4, counsel for the Debtor sent an email addressed to counsel for all Insurers, the Committee, and the U.S. Trustee stating the Debtor's intent to file this application and requesting that the parties respond with any objection to the relief requested. The only response received was from counsel for the Pacific Insurers. As reflected in the correspondence attached as Exhibit A to the declaration of Shane Moses filed herewith, the Pacific Insurers refused to

[1] This does not include joinders.

provide their consent without the Debtor engaging in a discussion of post-trial briefing that the Debtor believes is clearly premature. No other party responded.

As such, the Debtor requests the Court's leave to file a Confirmation Brief that is up to 80 pages in length to ensure that all relevant legal and factual matters are fully addressed for the Court's consideration.

V. CONCLUSION

WHEREFORE, the Debtors requests that the Court enter an order substantially in the form attached as **Exhibit A** granting the relief requested herein to permit the Debtor to file a Confirmation Brief that is no more than 80 pages in length, and for such other and further relief as is just and proper.

DATED: June 5, 2026

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/s/ Shane J. Moses
SHANE J. MOSES

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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 **[PROPOSED] ORDER GRANTING *EX PARTE* APPLICATION FOR ORDER PURSUANT TO B.L.R. 9013-1(C) AUTHORIZING OVERSIZE BRIEFING FOR DEBTOR'S MEMORANDUM OF LAW IN SUPPORT OF CONFIRMATION OF DEBTOR'S MODIFIED FOURTH AMENDED PLAN OF REORGANIZATION**

The Court, having considered the *Ex Parte Application for Order Pursuant to B.L.R. 9013-1(C) Authorizing Oversize Briefing for Debtor's Memorandum of Law in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* (the "Application"), requesting entry of an order pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the Northern District of California enlarging the page limit for the *Debtor's Memorandum of Law in Support of Confirmation of Debtor's Modified*

Fourth Amended Plan of Reorganization (the "Confirmation Brief") filed by 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"); after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as provided herein.

2. The Court GRANTS the Debtor leave to file a brief in excess of the 25-page limit provided in Local Bankruptcy Rule 9013-1(c).

3. The Debtor's Confirmation Brief shall not exceed 80 pages (exclusive of any schedules or exhibits thereto and/or any declarations filed in connection therewith).

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

END OF ORDER

COURT SERVICE LIST

All ECF Recipients.