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**UNITED STATES BANKRUPTCY COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

In re:

THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,

Debtor.

Bankruptcy Case No.: 23-40523 WJL

Hon. William J. Lafferty

Chapter 11

**DECLARATION OF TIMOTHY W. EVANSTON IN SUPPORT OF LONDON MARKET INSURERS' OMNIBUS OPPOSITION TO: (1) DEBTOR'S THIRD MOTION IN LIMINE TO LIMIT INSURERS' ARGUMENT AND EVIDENCE TO THE SCOPE OF THEIR CONFIRMATION OBJECTIONS; AND (2) OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION IN LIMINE TO PRECLUDE OR LIMIT INSURER PARTICIPATION AT THE HEARING ON CONFIRMATION OF THE DEBTOR'S MODIFIED FOURTH AMENDED PLAN**

Date: June 12, 2026
Time: 9:00 a.m.
Place: United States Bankruptcy Court
1300 Clay Street, Courtroom 220
Oakland, CA 94612

I, Timothy W. Evanston, declare as follows:

1. I am an attorney at Skarzynski Marick & Black LLP, counsel of record for Certain Underwriters at Lloyd's, London and certain London Market Insurers ("LMI") in the above-captioned chapter 11 case. I submit this declaration in support of London Market Insurers' *Omnibus Opposition to the: (1) Debtor's Third Motion in Limine to Limit Insurers' Argument and Evidence to the Scope of their Confirmation Objections; and (2) Official Committee of Unsecured Creditors' Motion in Limine to Preclude or Limit Insurer Participation at the Hearing on Confirmation of the Debtor's Modified Fourth Amended Plan* (the "Omnibus Opposition"). Except where stated on information and belief, I have personal knowledge of the matters set forth in this declaration, and if called as a witness, I could and would testify competently to them. Capitalized terms used but not defined herein have the meanings given to them in the Omnibus Opposition.

2. In connection with confirmation of the Plan, LMI actively participated in the discovery conducted by the parties. As one of the "Certain Insurers," LMI joined in the Certain Insurers' interrogatories and requests for production of documents propounded on both the Debtor and the Committee, each propounded on or around April 6, 2026. True and correct copies of the interrogatories and requests for production of documents propounded on the Debtor and the Committee are attached as **Exhibit A**.

3. LMI, together with the other Certain Insurers, met and conferred with counsel for the Committee on April 23, 2026, and with counsel for the Debtor on April 29, 2026, in an effort to resolve issues arising from the Committee's and the Debtor's respective responses and objections to the interrogatories and requests for production of documents propounded on each of them.

4. LMI separately served Requests for Admissions on the Debtor seeking to establish the authenticity and admissibility of four London Market insurance policies issued to the Debtor's predecessor (Policy Nos. LM 29079/K 78138, LM 29080/CU 3061, LM 26336/CU 1001, and LM 26337/K 66034, spanning 1960–1966), and pursued a corresponding stipulation regarding the authentication and admissibility of those policies. A true and correct copy of the Requests for Admissions are attached as **Exhibit B**.

5. LMI also appeared at, participated in, or monitored every deposition taken in this matter, including the depositions of Bishop Michael C. Barber (April 27, 2026); Attila J. Bardos, the Debtor's Rule 30(b)(6) corporate designee (April 28 and May 6, 2026); Daniel Flanagan, Debtor's fact witness (April 28, 2026) Andrew Currier, the Rule 30(b)(6) designee for the Roman Catholic Welfare Corporation ("RCWC") (April 30, 2026); Ronald Gies, the Rule 30(b)(6) designee for the Roman Catholic Cemeteries ("RCC") (April 30, 2026); Katherine McNally, the expert retained to estimate the Debtor's aggregate abuse-claim liability (May 26, 2026); Paul Shields, the Committee's financial expert (May 27, 2026); Charles Moore, the expert proffered regarding the plan's compliance with the best interests of creditors test and its feasibility (May 28, 2026); Randi Rosen, who provided the Debtor's property valuations (May 28, 2026); Dr. Kurt Martens, the Debtor's canon law expert (June 2, 2026); Matthew Babcock, the Rule 30(b)(6) designee for the Committee (April 30 and June 3, 2026); and Denise Martin, Ph.D., the Debtor's economic-reasonableness expert (June 2, 2026). True and correct copies of the deposition transcript cover pages that LMI attended are attached as "**Exhibit C**".

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 10, 2026, at Irvine, California.

*/s/ Timothy W. Evanston*
Timothy W. Evanston

**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2026, a copy of the DECLARATION OF TIMOTHY W. EVANSTON IN SUPPORT OF LONDON MARKET INSURERS' OMNIBUS OPPOSITION TO THE: (1) DEBTOR'S THIRD MOTION IN LIMINE TO LIMIT INSURERS' ARGUMENT AND EVIDENCE TO THE SCOPE OF THEIR CONFIRMATION OBJECTIONS; AND (2) OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION IN LIMINE TO PRECLUDE OR LIMIT INSURER PARTICIPATION AT THE HEARING ON CONFIRMATION OF THE DEBTOR'S MODIFIED FOURTH AMENDED PLAN was filed through the Electronic Case Filing System of the United States Bankruptcy Court, Northern District of California, and served electronically to all parties registered to received notice via ECF.

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Dated June 10, 2026

*/s/ Timothy W. Evanston*
Timothy W. Evanston

# Exhibit A

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**UNITED STATES BANKRUPTCY COURT**
**NORTHERN DISTRICT OF CALIFORNIA**
**OAKLAND DIVISION**

| | |
|---|---|
| In re:<br><br>THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,<br><br>Debtor. | Case No. 23-40523-WJL<br><br>Chapter 11 |

**CERTAIN INSURERS' FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE ROMAN CATHOLIC BISHOP OF OAKLAND**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, as made applicable herein by Federal Rules of Bankruptcy Procedure 7026 and 7034, Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation ("Westport"); Continental Casualty Company ("Continental"); Travelers Casualty and Surety Company f/k/a Aetna Casualty & Surety Company ("Travelers"); Insurance Company of North America, Westchester Fire Insurance Company, Pacific Indemnity Company, and Pacific Employers Insurance Company (together "INA"); and London Market Insurers[1] ("LMI", and collectively with Westport, Continental, Travelers, and INA, the "Certain Insurers") by and through their undersigned counsel, hereby serve the following requests for the production of documents (the "Requests for Production") in connection with the *Debtor's Modified Fourth Amended Plan of Reorganization Dated March 27, 2026* (the " Debtor's Plan") [Docket No. 2758] of The Roman Catholic Bishop of Oakland (the "Debtor").

The Certain Insurers hereby request the Debtor fully answer the following requests (each, a "Request" and collectively, the "Requests") in writing, and serve a copy of its responses and objections upon undersigned counsel for the Certain Insurers, by 5:00 p.m. PT on April 13, 2026. In responding to these Requests, the Debtor is to obtain and furnish all documents available to its representatives, employees, agents, servants or attorneys. The Certain Insurers also request that You timely supplement Your responses to these Requests as required by the Federal Rules of Bankruptcy Procedure and the Federal Rules of Civil Procedure.

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[1] London Market Insurers 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.).

## DEFINITIONS

For the purposes of these Requests, the following Definitions shall apply:

1. The words "all," "any," and "each" shall each be construed as encompassing any and all. The singular shall include the plural and vice versa; the terms "and" or "or" shall be both conjunctive and disjunctive; and the term "including" means "including without limitation." The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense. The singular and masculine form of nouns and pronouns shall embrace, and be read and applied as including, the plural, feminine or neuter, as circumstances may make appropriate. Unless otherwise stated, all capitalized terms used but not defined herein shall have the meaning ascribed to them in the Debtor's Plan.

2. The words "all" or "any and all" documents or communications shall mean every document or communication which can be located or discovered by reasonably diligent effort, and which documents are within your possession, custody, or control (including, without limitation, documents within the possession, custody or control of your agents); documents that you have a legal right to obtain; documents that you have a right to copy or have access to; and documents that you have placed in the temporary possession, custody or control of any third person.

3. "Abuse Claim" shall have the meaning provided in Section 1.1.2 of the Debtor's Plan.

4. "Abuse Claim Discharge Date" shall mean the date the discharge provided under the Debtor's Plan and Section 1141 of the Bankruptcy Code will be effective as to each Abuse Claim as provided in Articles VIII and IX and Sections 13.3, 13.9, and 13.11.2 of the Debtor's Plan.



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 4 of 90

5. "Abuse Claimant" shall have the meaning provided in Section 1.1.4 of the Debtor's Plan.

6. "Abuse Insurance Policies" shall have the meaning provided in Section 1.1.6 of the Debtor's Plan.

7. "Abuse Claims Reviewer" shall have the meaning provided in Section 1.1.5 of the Debtor's Plan.

8. "Assigned Insurance Interests" shall have the meaning provided in Section 1.1.15 of the Debtor's Plan.

9. "Cause of Action" shall have the meaning provided in Section 1.1.27 of the Debtor's Plan.

10. "Channeled Claim" shall have the meaning provided in Section 1.1.31 of the Debtor's Plan.

11. "Certain Insurers' First Interrogatories" shall mean *Certain Insurers' First Interrogatories to The Roman Catholic Bishop of Oakland* served contemporaneously herewith.

12. "Channeling Injunction" shall have the meaning provided in Section 1.1.32 of the Debtor's Plan.

13. "Debtor's Disclosure Statement" shall mean the *Disclosure Statement in Support of Debtor's Modified Fourth Amended Plan of Reorganization* [Docket No. 2759] (as may be modified, amended, or supplemented from time to time)

14. "Debtor's Plan" shall mean *Debtor's Modified Fourth Amended Plan of Reorganization Dated March 27, 2026* [Docket No. 2758] (as may be modified, amended, or supplemented from time to time).

15. "Committee" shall have the meaning provided in Section 1.1.42 of the Debtor's Plan.

16. "Communications" shall mean all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, notes, telegrams, correspondence, memoranda, emails, facsimile transmissions, or other form of verbal, written, mechanical, or electronic disclosure, in Your actual or constructive control or custody or in the control or custody of any current or former affiliates, representatives or advisors.

17. "Concerning" shall mean relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, constituting, describing, identifying, referring to, referencing, discussing, indicating, connected with or otherwise pertaining in any way, in whole or in part, to the subject matter being referenced.

18. "Confirmation Hearing" shall mean the hearing in the Bankruptcy Case to consider confirmation of the Debtor's Plan.

19. "Debtor", "You" and "Your" and variants thereof shall have the meaning provided in Section 1.1.51, and any attorneys, representatives, consultants, advisors, or anyone acting on the Debtor's behalf.

20. "Debtor Extracontractual Insurance Actions" shall have the meaning provided in Section 1.1.54 of the Debtor's Plan.

21. "Documents" shall mean any writings, recordings, electronic files and emails, or photographs, whether original or duplicate, as defined in Federal Rule of Evidence 1001 and Federal Rule of Civil Procedure 34(a), inclusively, including (but not limited to) all documents and information in Your possession, custody, or control, and includes: all and any written, recorded, or graphic material, however produced or reproduced, minutes, summaries, memoranda, transcripts, tapes, or other voice recordings, and all other documents and tangible things, including booklets, brochures, pamphlets, circulars, notices, periodicals, papers, records, contracts, agreements, photographs, minutes, memoranda, messages, appraisals, analyses, reports, files, interoffice

memoranda, or interoffice communications of any description, calculations, invoices, accounting entries, diary entries, calendars, inventory sheets, ledgers, correspondence, emails, phone recordings, instant messages, text messages, telegrams, advertisements, press releases, notes, letters, diaries, working papers, schedules, projections, graphs, charts, films, tapes, print-outs, and all other data, whether recorded by electronic or other means, and all drafts thereof. If a Document was prepared in several copies, or if additional copies were thereafter made, and if any such copies are not identical in all respects or are no longer identical by reason of subsequent notation or modification of any kind whatsoever, including notes on the front or back, in the margins, or on any of the pages thereof, then each such non-identical copy is a separate Document and must be produced. When examples of categories or types of Documents are given in a particular Request by use of phrases such as "including," this shall always be interpreted as being for illustrative purposes only (*i.e.*, to be understood as "including without limitation") and in no way limits or narrows the scope of any Request. "Documents" always includes Communications, whether so stated in a particular Request or not.

22. "Entity" shall have the meaning provided in Section 1.1.63 of the Debtor's Plan

23. The terms "identify," "identity," "state the identity," and "identification" shall mean:

(a) When used in reference to an individual, his or her (i) full name, (ii) present or last known home address and telephone numbers, (iii) present or last known business address and telephone numbers, and (iv) present or last known occupation, employer and job title or description (indicating whether the information provided is "current" or "last known" in each instance);

(b) When used in reference to an organization of any kind, (i) its full name, (ii) or other entity, (iii) its date and state of incorporation (if applicable), (iv) the address of its principal place of business and its telephone numbers, (v) each state in which it is registered or authorized to do

business and the date on which it was first so registered or authorized, (vi) each state in which it was, but is no longer, registered or authorized to do business, the date on which it was first so registered or authorized, and the date on which it ceased to be so registered or authorized, (vii) the name and current or last known address of each person who currently serves as an officer or director (if applicable) together with the title held by each such person and the date from which such title has been held, (viii) whether it is currently active and, if not, the date on which and reason for which it ceased doing business, (ix) whether it is currently in good standing in each state in which it is incorporated or registered or authorized to do business, (x) the address and phone number of each other location at which it currently does business and the date on which it commenced doing business at that location, and (xi) the address and phone number of each location at which it did business in the past, but at which it currently does not operate, and the dates between which it did business at each such location;

(c) When used in reference to a Document, (i) the type of Document, (ii) its date, (iii) the identity of its author(s) and its recipient(s), (iv) any title and/or serial or file number appearing on the Document, (v) the identity of its present custodian, (vi) its present location, and (vii) a brief description of its subject matter. If any such Document was, but is no longer in Your possession or control or in existence, state whether it is missing, lost, has been destroyed, has been transferred to others or has been otherwise disposed of; and

(d) When used in reference to an oral communication, (i) the date, place or places, and parties to the oral communication or some other means of identifying the oral communication; (ii) the substance of the oral communication; (iii) the medium through which the oral communication was made (in person or by telephone or video conference); (iv) each person who participated in the oral communication; (v) each person hearing the oral communication; and (vi) whether any written



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 8 of 90

note or memorandum documenting the oral communication exists in the manner required to identify a Document as defined above.

24. "Insurance Assignment" shall have the meaning provided in Sections 1.1.93 of the Debtor's Plan.

25. "Insurance Action" shall have the meaning provided in Section 1.1.94 of the Debtor's Plan.

26. "Insurance and Benefits Reserves" shall have the meaning provided in Section 1.1.95 of the Debtor's Plan.

27. "Insurance Recoveries" shall have the meaning provided in Section 1.1.96 of the Debtor's Plan.

28. "Non-Debtor Catholic Entity" shall have the meaning provided in Section 1.1.111 of the Debtor's Plan.

29. "Person" shall have the meaning provided in Section 1.1.115 of the Debtor's Plan.

30. "Petition Date" shall have the meaning provided in Section 1.1.116 of the Debtor's Plan.

31. "Plan Documents" shall have the meaning provided in Section 1.1.118 of the Debtor's Plan.

32. The phrase "possession, custody, or control" shall be construed in the broadest possible manner and includes not only those things in the Debtor's immediate possession, but also those things which are subject to its control.

33. The terms "regarding," "relating to," or "evidencing" shall mean relating to, referring to, reflecting, tending to establish, recording, memorializing, constituting, supporting, mentioning, or concerning in any way, directly or indirectly.

34. "RCWC" shall have the meaning provided in Section 1.1.134 of the Debtor's Plan.



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 9 of 90

35. "Solicitation Procedures" shall mean those procedures for the solicitation of the Debtor's Plan set forth in the Debtor's Disclosure Statement.

36. "Survivors' Trust" shall have the meaning provided in Section 1.1.151 of the Debtor's Plan.

37. "Survivors' Trust Distribution Plan" shall have the meaning provided in Section 1.1.156 of the Debtor's Plan.

38. "Survivors' Trust Documents" shall have the meaning provided in Section 1.1.157 of the Debtor's Plan.

39. "Survivors' Trustee" shall have the meaning provided in Section 1.1.158 of the Debtor's Plan.

40. "Unknown Abuse Claims Representative" shall have the meaning provided in Section 1.1.172 of the Debtor's Plan.

**INSTRUCTIONS**

The preceding Definitions apply to each of these Instructions, and for the purposes of these Requests, the following Instructions shall be followed:

1. Federal Rule of Civil Procedure 34, made applicable to this proceeding pursuant to Federal Rule of Bankruptcy Rule 7034 and 9014(c), is hereby incorporated by reference and applies to each of the following instructions.

2. All responses shall comply with the requirements of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Local Rules of the United States Bankruptcy Court for the Northern District of California.

3. Unless otherwise stated in a specific Request herein, the relevant time period for the discovery being sought shall be the period from the inception of the Diocese to the present.



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 10 of 90

4. These Requests shall be deemed continuing in nature. In the event You become aware of or acquire additional information relating or referring to any of the following Requests, such additional information is to be promptly produced.

5. Produce all Documents and all other materials described below in Your actual or constructive possession, custody, or control, including in the possession, custody, or control of current or former employees, officers, directors, agents, agents' representatives, consultants, contractors, vendors, or any fiduciary or other third parties, wherever those Documents and materials are maintained, including on personal computers, PDAs, wireless devices, local area networks, application-based communications services (including, without limitation, Facebook Messenger, Instant Bloomberg, WeChat, Kakao Talk, WhatsApp, Signal, iMessage, etc.), and web-based file hosting services (including, without limitation, Gmail, Yahoo, etc.). You must produce all Documents in Your possession, custody, or control, whether maintained in electronic or paper form and whether located on hardware owned and maintained by You or hardware owned and/or maintained by a third party that stores data on Your behalf.

6. Documents not otherwise responsive to these Requests for Production should be produced: (a) if such Documents mention, discuss, refer to, explain, or concern one or more Documents that are called for by these Requests for Production; (b) if such Documents are attached to, enclosed with, or accompanying Documents called for by these Requests for Production; or (c) if such Documents constitute routing slips, transmittal memoranda or letters, comments, evaluations, or similar materials.

7. Documents should include all exhibits, appendices, linked Documents, or otherwise appended Documents that are referenced in, attached to, included with, or are a part of the requested Documents.



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 11 of 90

8. If any Document, or any part thereof, is not produced based on a claim of attorney-client privilege, work-product protection, or any other privilege, then in answer to such Request for Production or part thereof, for each such Document, You must:

a. Identify the type, title and subject matter of the Document;

b. State the place, date, and manner of preparation of the Document;

c. Identify all authors, addresses, and recipients of the Document, including information about such persons to assess the privilege asserted; and

d. Identify the legal privilege(s) and the factual basis for the claim.

9. Documents should not contain redactions unless such redactions are made to protect information subject to the attorney-client privilege and/or work-product doctrine. In the event any Documents are produced with redactions, a log setting forth the information requested in Instruction 8 above must be provided.

10. To the extent a Document sought herein was at one time, but is no longer, in Your actual or constructive possession, custody, or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred to others; and/or (d) has been otherwise disposed of. In each instance, identify the Document, state the time period during which it was maintained, state the circumstance and date surrounding authorization for such disposition, identify each person having knowledge of the circumstances of the disposition, and identify each person who had possession, custody, or control of the Document. Documents prepared prior to, but which relate or refer to, the time period covered by these Requests are to be identified and produced.

11. If any part of the following Requests cannot be responded to in full, please respond to the extent possible, specifying the reason(s) for Your inability to respond to the remainder and stating whatever information or knowledge You have concerning the portion to which You do not respond.



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 12 of 90

12. If You object to any of these Requests, state in writing with specificity the grounds of Your objections. Any ground not stated shall be waived. If You object to a particular portion of any Request, You shall respond to any other portions of such Request as to which there is no objection and state with specificity the grounds of the objection.

13. If the identify of Documents responding to a Request is not known, then that lack of knowledge must be specifically indicated in the response. If any information requested is not in Your possession, but is known or believed to be in the possession of another person or entity, then identify that person or entity and state the basis of Your belief or knowledge that the requested information is in such person's or entity's possession.

**MANNER OF PRODUCTION**

1. All Documents produced to the Certain Insurers shall be provided in either native file ("native") or single-page 300 dpi-resolution group IV TIF ("tiff") format as specified below, along with appropriately formatted industry-standard database loan files and accompanied by true and correct copies or representations of unaltered attendant metadata. Where Documents are produced in tiff format, each Document shall be produced along with a multi-page, Document-level searchable text file ("searchable text") as rendered by an industry-standard text extraction program in the case of electronic originals, or by an industry-standard Optical Character Recognition ("ocr") program in the case of scanned paper Documents. Searchable text of Documents shall not be produced as fielded data within the ".dat file" as described below.

2. Database Load Files and Production Media Structure: Database load files shall consist of: (i) a comma-delimited values (".dat") file containing: Production Document identifier information, data designed to preserve "parent and child" relationships within Document "families," reasonably accessible and properly preserved metadata (or bibliographic coding in the



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 13 of 90

case of paper Documents), custodian or Document source information; and (ii) an Opticon ("opt") file to facilitate the loading of tiff images.

3. Load files should be provided in a root-level folder named "Data," images shall be provided within a root level "Images" folder containing reasonably structured subfolders, and searchable text files shall be provided in a single root-level "Text" folder.

4. Electronic Documents and Data, Generally: Documents and other responsive data or materials created, stored, or displayed on electronic or electro-magnetic media shall be produced in the order in which the Documents are or were stored in the ordinary course of business, including all reasonably accessible metadata, custodian or Document source information, and searchable text so as to allow the Certain Insurers, through a reasonable and modest effort, to fairly, accurately, and completely access, search, display, comprehend, and assess the Documents' true and original content.

5. Emails and Attachments, and Other Email Account-Related Documents: All Documents and accompanying metadata created and/or stored in the ordinary course of business within commercial, off-the-shelf email systems, including, but not limited to Microsoft ExchangeTM, Lotus NotesTM, or Novell GroupwiseTM shall be produced in tiff format, accompanying metadata, and searchable text files or, alternatively, in a format that fairly, accurately, and completely represents each Document in such a manner as to make the Document(s) reasonably useable, manageable, and comprehendible by the Certain Insurers.

6. Documents and Data Created or Stored in or by Structured Electronic Databases: With the exclusion of email and email account-related Documents and data, all Documents and accompanying metadata created and/or stored in structured electronic databases or files shall be produced in a format that enables the Certain Insurers to reasonably manage and import those Documents into a useable, coherent database. Documents must be accompanied by reasonably


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 14 of 90

detailed documentation explaining the Documents' content and format, including, but not limited to, data dictionaries and diagrams. Some acceptable formats, if and only if provided with definitive file(s), table(s), and field level schemas include:

a. XML format file(s);

b. Microsoft SQL database(s);

c. Access database(s); and/or

d. Fixed or variable length ASCII delimited files.

7. Spreadsheets, Multimedia, and Non-Standard File Types: All Documents generated or stored in software such as Microsoft Excel or other commercially available spreadsheet programs, as well as any multimedia files such as audio or video, shall be produced in their native format, along with an accompanying placeholder image in tiff format indicating a native file has been produced. A "Nativelink" entry shall be included in the .dat load file indicating the relative path to each native file on the production media. To the extent You have other file types that do not readily or easily and accurately convert to tiff and searchable text, You may elect to produce those files in native format subject to the other requirements listed herein. Native files may be produced within a separate root-level folder structure on deliverable media entitled "Natives."

8. "Other" Electronic Documents: All other Documents and accompanying metadata and embedded data created or stored in unstructured files generated by commercially available software systems (excluding emails, structured electronic databases, spreadsheets, or multimedia) such as, but not limited to, word processing files (such as Microsoft Word), image files (such as Adobe .pdf files and other formats), and text files shall be produced in tiff and searchable text format in the order the files are or were stored in the ordinary course of business.

9. Paper Documents: Documents originally created or stored on paper shall be produced in tiff format. Relationships between Documents shall be identified within the Relativity

.dat file utilizing document identifier numbers to express parent Document/child attachment boundaries, folder boundaries, and other groupings. In addition, the searchable text of each Document shall be provided as a multi-page text file as provided for by these Requests.

**REQUESTS FOR PRODUCTION**

**REQUEST NO. 1:** All Communications and Documents by and between You and/or Your counsel and any Abuse Claimant and/or any Abuse Claimant's counsel Concerning the Debtor's Plan and/or the other Plan Documents.

**REQUEST NO. 2:** All Communications and Documents by and between You and/or Your counsel and the Committee and/or its counsel Concerning the Debtor's Plan and/or the other Plan Documents.

**REQUEST NO. 3:** All Communications and Documents by and between You and/or Your counsel and RCWC and/or its counsel Concerning the Debtor's Plan and/or the other Plan Documents.

**REQUEST NO. 4:** All Communications and Documents by and between You and/or Your counsel and any Non-Debtor Catholic Entity and/or their counsel Concerning the Debtor's Plan and/or the other Plan Documents.

**REQUEST NO. 5:** All Communications and Documents by and between You and/or Your counsel and the Unknown Abuse Claims Representative and/or its counsel Concerning the Debtor's Plan and/or other Plan Documents.

**REQUEST NO. 6:** All Documents and Communications relating to the selection of, and qualifications of, the Survivors' Trustee or, if no Person has been identified by the Debtor, all Persons the Debtor is considering for the role of Survivors' Trustee.

**REQUEST NO. 7:** All Documents and Communications relating to the selection of, and qualifications of, the Abuse Claims Reviewer, or, if no Person has been selected, all Persons considered for the role of Abuse Claims Reviewer.

**REQUEST NO. 8:** All Documents and Communications between You and/or Your Counsel and the Survivors' Trustee and/or the Abuse Claims Reviewer Concerning their potential roles under the Plan and/or the other Plan Documents.

**REQUEST NO. 9:** All Documents and Communications Concerning the negotiation and drafting of the Survivors' Trust Distribution Plan and/or terms for allowing and/or valuing Abuse Claims against the Debtor.

**REQUEST NO. 10:** All Abuse verdicts and final judgments entered in Abuse actions against the Debtor that were entered before the Petition Date.

**REQUEST NO. 11:** All Documents and Communications by and between You and/or Your counsel and the Committee and/or its counsel Concerning Abuse Insurance Policies.

**REQUEST NO. 12:** All Documents and Communications Concerning the treatment of Abuse Claims set forth in Sections 4.4 and 4.5 of the Debtor's Plan.

**REQUEST NO. 13:** All Documents and Communications Concerning the Insurance Assignment set forth in Section 8.1 of the Debtor's Plan.

**REQUEST NO. 14:** All Documents and Communications Concerning the Insurance Coverage for Abuse Claims set forth in Section 8.2 of the Debtor's Plan.

**REQUEST NO. 15:** All Documents and Communications Concerning the Preservation of Rights of Non-Settling Insurers set forth in Section 8.3 of the Debtor's Plan.

**REQUEST NO. 16:** All Documents and Communications Concerning the Reductions in Non-Settling Insurers' Liability set forth in Section 8.7 of the Debtor's Plan.



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 17 of 90

**REQUEST NO. 17:** All Documents and Communications Concerning The Coverage Action, including Debtor Extracontractual Insurance Actions, set forth in Section 8.9 of the Debtor's Plan.

**REQUEST NO. 18:** All Documents and Communications Concerning the Survivors' Trust Assumption of Liabilities for Abuse Claims set forth in Section 9.6 of the Debtor's Plan.

**REQUEST NO. 19:** All Documents and Communications Concerning the Method of Determination of Abuse Claims and Rights of Abuse Claimants to Choose to Pursue Litigation set forth in Section 9.8 of the Debtor's Plan.

**REQUEST NO. 20:** All Documents and Communications Concerning the Document Access set forth in Section 12.8 of the Debtor's Plan.

**REQUEST NO. 21:** All Documents and Communications Concerning the Abuse Claim Discharge Date.

**REQUEST NO. 22:** All Documents and Communications Concerning the Channeling Injunction set forth in Section 13.11 of the Debtor's Plan.

**REQUEST NO. 23:** All Documents and Communications Concerning the feasibility of the Debtor's Plan under Section 1129(a)(11) of the Bankruptcy Code.

**REQUEST NO. 24:** The Plan Documents, including the Survivors' Trust Documents, and all drafts, sections, exhibits, schedules, annexes, non-final versions, and other Documents that have been, are being, or are intended to be incorporated into, attached to, or filed as part of the Plan Documents, whether or not complete or in final form, and whether or not yet filed with the Court.

**REQUEST NO. 25:** All Documents You identified in response to the Certain Insurers' First Interrogatories.

**REQUEST NO. 26:** All Documents that You intend to introduce or rely upon at the Confirmation Hearing.

Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 19 of 90

Dated: April 6, 2026.

By: */s/ Harris B. Winsberg*

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Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 21 of 90

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**CERTIFICATE OF SERVICE**

I, Brian Aton, declare:

I am over the age of 18 and not a party to this bankruptcy case. My business address is: Parker, Hudson, Rainer & Dobbs LLP, 303 Peachtree Street NE, Suite 3600, Atlanta, Georgia 30308.

I hereby certify that on April 6, 2026, a true and correct copy of the **CERTAIN INSURERS' FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE ROMAN CATHOLIC BISHOP OF OAKLAND** was served on the following parties via electronic mail:

Counsel for the Debtor: Eileen R. Ridly, eridley@foley.com; Shane J. Moses, smoses@foley.com; Ann Marie Uetz, auetz@foley.com; Matthew D. Lee, mdlee@foley.com; Geoffrey S. Goodman, ggoodman@foley.com; Mark C. Moore, mmoore@foley.com; Thomas F. Carlucci, tcarlucci@foley.com; Emil Khatchatourian, ekhatchatourian@foley.com.

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Counsel for the UST: Jason Blumberg, jason.blumberg@usdoj.gov; Trevor Fehr, trevor.fehr@usdoj.gov; Greg Powell, greg.powell@usdoj.gov; Phillip Shine, Phillip.shine@usdoj.gov.

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Counsel for Continental Casualty Company: Miranda Turner, mturner@plevinturner.com; Jordan Hess, jhess@plevinturner.com; Mark Plevin, mplevin@plevinturner.com.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 6, 2026.

*/s/ Brian Aton*
Brian Aton


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 25 of 90

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**UNITED STATES BANKRUPTCY COURT**
**NORTHERN DISTRICT OF CALIFORNIA**
**OAKLAND DIVISION**

| | |
|---|---|
| In re:<br><br>THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,<br><br>Debtor. | Case No. 23-40523-WJL<br><br>Chapter 11 |

**CERTAIN INSURERS' FIRST SET OF INTERROGATORIES TO THE ROMAN CATHOLIC BISHOP OF OAKLAND**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, as made applicable herein by Federal Rules of Bankruptcy Procedure 7026 and 7034, Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation ("Westport"); Continental Casualty Company ("Continental"); Travelers Casualty and Surety Company f/k/a Aetna Casualty & Surety Company ("Travelers"); Insurance Company of North America, Westchester Fire Insurance Company, Pacific Indemnity Company, and Pacific Employers Insurance Company (together "INA"); and London Market Insurers[1] ("LMI", and collectively with Westport, Continental, Travelers, and INA, the "Certain Insurers") by and through their undersigned counsel, hereby serve the following interrogatories (the "Interrogatories") in connection with the *Debtor's Modified Fourth Amended Plan of Reorganization Dated March 27, 2026* (the "Debtor's Plan") [Docket No. 2758] of The Roman Catholic Bishop of Oakland (the "Debtor").

The Certain Insurers hereby request the Debtor fully answer the following interrogatories (each, a "Interrogatory" and collectively, the "Interrogatories") in writing, and serve a copy of its responses and objections upon undersigned counsel for the Certain Insurers, no later than 5:00 p.m. PT on April 13, 2026. In responding to these Interrogatories, the Debtor is to obtain and furnish all documents available to its representatives, employees, agents, servants or attorneys. The Certain Insurers also request that You timely supplement Your responses to these Interrogatories as required by the Federal Rules of Bankruptcy Procedure and the Federal Rules of Civil Procedure.

[1] London Market Insurers 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.).

## DEFINITIONS

For the purposes of these Interrogatories, the following Definitions shall apply:

1. The words "all," "any," and "each" shall each be construed as encompassing any and all. The singular shall include the plural and vice versa; the terms "and" or "or" shall be both conjunctive and disjunctive; and the term "including" means "including without limitation." The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense. The singular and masculine form of nouns and pronouns shall embrace, and be read and applied as including, the plural, feminine or neuter, as circumstances may make appropriate. Unless otherwise stated, all capitalized terms used but not defined herein shall have the meaning ascribed to them in the Debtor's Plan.

2. The words "all" or "any and all" documents or communications shall mean every document or communication which can be located or discovered by reasonably diligent effort, and which documents are within your possession, custody, or control (including, without limitation, documents within the possession, custody or control of your agents); documents that you have a legal right to obtain; documents that you have a right to copy or have access to; and documents that you have placed in the temporary possession, custody or control of any third person.

3. "Abuse Claim" shall have the meaning provided in Section 1.1.2 of the Debtor's Plan.

4. "Abuse Claim Discharge Date" shall mean the date the discharge provided under the Debtor's Plan and Section 1141 of the Bankruptcy Code will be effective as to each Abuse Claim as provided in Articles VIII and IX and Sections 13.3, 13.9, and 13.11.2 of the Debtor's Plan.

5. "Abuse Claimant" shall have the meaning provided in Section 1.1.4 of the Debtor's Plan.

6. "Abuse Claims Reviewer" shall have the meaning provided in Section 1.1.4 of the Debtor's Plan.

7. "Abuse Insurance Policies" shall have the meaning provided in Section 1.1.6 of the Debtor's Plan.

8. "Assigned Insurance Interests" shall have the meaning provided in Section 1.1.15 of the Debtor's Plan.

9. "Channeled Claim" shall have the meaning provided in Section 1.1.31 of the Debtor's Plan.

10. "Certain Insurers' First Interrogatories" shall mean *Certain Insurers' First Interrogatories to The Roman Catholic Bishop of Oakland* served contemporaneously herewith.

11. "Channeling Injunction" shall have the meaning provided in Section 1.1.32 of the Debtor's Plan.

12. "Churches" shall have the meaning provided in Section 1.1.35 of the Debtor's Plan.

13. "Committee" shall have the meaning provided in Section 1.1.42 of the Debtor's Plan.

14. "Coverage Action" shall have the meaning provided in Section 1.1.47 of the Debtor's Plan.

15. "Debtor," "You," or "Your" and variants thereof shall have the meaning provided in Section 1.1.51 of the Debtor's Plan, and any attorneys, representatives, consultants, advisors, or anyone acting on the Debtor's behalf.

16. "Debtor's Disclosure Statement" shall mean the *Disclosure Statement in Support of Debtor's Modified Fourth Amended Plan of Reorganization* [Docket No. 2759] (as may be modified, amended, or supplemented from time to time)

17. "Debtor's Plan" shall mean *Debtor's Modified Fourth Amended Plan of Reorganization Dated March 27, 2026* [Docket No. 2758] (as may be modified, amended, or supplemented from time to time).

18. "Debtor Extracontractual Insurance Actions" shall have the meaning provided in Section 1.1.54 of the Debtor's Plan.

19. "Communications" shall mean all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, notes, telegrams, correspondence, memoranda, emails, facsimile transmissions, or other form of verbal, written, mechanical, or electronic disclosure, in Your actual or constructive control or custody or in the control or custody of any current or former affiliates, representatives or advisors.

20. "Concerning" shall mean relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, constituting, describing, identifying, referring to, referencing, discussing, indicating, connected with or otherwise pertaining in any way, in whole or in part, to the subject matter being referenced.

21. "Confirmation Hearing" shall mean the hearing in the Bankruptcy Case to consider confirmation of the Debtor's Plan.

22. "Confirmation Order" shall have the meaning set forth in Section 1.1.43 of the Debtor's Plan.

23. "Documents" shall mean any writings, recordings, electronic files and emails, or photographs, whether original or duplicate, as defined in Federal Rule of Evidence 1001 and Federal Rule of Civil Procedure 34(a), inclusively, including (but not limited to) all documents and information in Your possession, custody, or control, and includes: all and any written, recorded, or graphic material, however produced or reproduced, minutes, summaries, memoranda, transcripts, tapes, or other voice recordings, and all other documents and tangible things, including booklets,

brochures, pamphlets, circulars, notices, periodicals, papers, records, contracts, agreements, photographs, minutes, memoranda, messages, appraisals, analyses, reports, files, interoffice memoranda, or interoffice communications of any description, calculations, invoices, accounting entries, diary entries, calendars, inventory sheets, ledgers, correspondence, emails, phone recordings, instant messages, text messages, telegrams, advertisements, press releases, notes, letters, diaries, working papers, schedules, projections, graphs, charts, films, tapes, print-outs, and all other data, whether recorded by electronic or other means, and all drafts thereof. If a Document was prepared in several copies, or if additional copies were thereafter made, and if any such copies are not identical in all respects or are no longer identical by reason of subsequent notation or modification of any kind whatsoever, including notes on the front or back, in the margins, or on any of the pages thereof, then each such non-identical copy is a separate Document and must be produced. When examples of categories or types of Documents are given in a particular Request by use of phrases such as "including," this shall always be interpreted as being for illustrative purposes only (*i.e.*, to be understood as "including without limitation") and in no way limits or narrows the scope of any Request. "Documents" always includes Communications, whether so stated in a particular Request or not.

24. "Effective Date" shall have the meaning provided in Section 1.1.62 of the Debtor's Plan.

25. "Entity" shall have the meaning provided in Section 1.1.63 of the Debtor's Plan

26. "Final Determination" shall have the meaning provided in Section 1.1.77 of the Debtor's Plan.

27. The terms "identify," "identity," "state the identity," and "identification" shall mean:

(a) When used in reference to an individual, his or her (i) full name, (ii) present or last known home address and telephone numbers, (iii) present or last known business address and telephone numbers, and (iv) present or last known occupation, employer and job title or description (indicating whether the information provided is "current" or "last known" in each instance);

(b) When used in reference to an organization of any kind, (i) its full name, (ii) or other entity, (iii) its date and state of incorporation (if applicable), (iv) the address of its principal place of business and its telephone numbers, (v) each state in which it is registered or authorized to do business and the date on which it was first so registered or authorized, (vi) each state in which it was, but is no longer, registered or authorized to do business, the date on which it was first so registered or authorized, and the date on which it ceased to be so registered or authorized, (vii) the name and current or last known address of each person who currently serves as an officer or director (if applicable) together with the title held by each such person and the date from which such title has been held, (viii) whether it is currently active and, if not, the date on which and reason for which it ceased doing business, (ix) whether it is currently in good standing in each state in which it is incorporated or registered or authorized to do business, (x) the address and phone number of each other location at which it currently does business and the date on which it commenced doing business at that location, and (xi) the address and phone number of each location at which it did business in the past, but at which it currently does not operate, and the dates between which it did business at each such location;

(c) When used in reference to a Document, (i) the type of Document, (ii) its date, (iii) the identity of its author(s) and its recipient(s), (iv) any title and/or serial or file number appearing on the Document, (v) the identity of its present custodian, (vi) its present location, and (vii) a brief description of its subject matter. If any such Document was, but is no longer in Your possession



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 32 of 90

or control or in existence, state whether it is missing, lost, has been destroyed, has been transferred to others or has been otherwise disposed of; and

(d) When used in reference to an oral communication, (i) the date, place or places, and parties to the oral communication or some other means of identifying the oral communication; (ii) the substance of the oral communication; (iii) the medium through which the oral communication was made (in person or by telephone or video conference); (iv) each person who participated in the oral communication; (v) each person hearing the oral communication; and (vi) whether any written note or memorandum documenting the oral communication exists in the manner required to identify a Document as defined above.

28. "Immediate Payment" shall have the meaning provided in Sections 1.1.84 of the Debtor's Plan.

29. "Initial Determination" shall have the meaning provided in Sections 1.1.89 of the Debtor's Plan.

30. "Insurance Assignment" shall have the meaning provided in Sections 1.1.89 of the Debtor's Plan.

31. "Insurance Action" shall have the meaning provided in Section 1.1.94 of the Debtor's Plan.

32. "Insurance and Benefits Reserves" shall have the meaning provided in Section 1.1.95 of the Debtor's Plan.

33. "Insurance Recoveries" shall have the meaning provided in Section 1.1.96 of the Debtor's Plan.

34. "Litigation Claimant" shall have the meaning provided in Section 1.1.102 of the Debtor's Plan.

35. "Non-Debtor Catholic Entity" shall have the meaning provided in Section 1.1.111 of the Debtor's Plan.

36. "Non-Settling Insurer" shall have the meaning provided in Section 1.1.112 of the Debtor's Plan.

37. "Person" shall have the meaning provided in Section 1.1.115 of the Debtor's Plan.

38. "Plan Documents" shall have the meaning provided in Section 1.1.118 of the Debtor's Plan.

39. "Plan Supplement" shall have the meaning provided in Section 1.1.121 of the Debtor's Plan.

40. The phrase "possession, custody, or control" shall be construed in the broadest possible manner and includes not only those things in the Debtor's immediate possession, but also those things which are subject to its control.

41. The terms "regarding," "relating to," or "evidencing" shall mean relating to, referring to, reflecting, tending to establish, recording, memorializing, constituting, supporting, mentioning, or concerning in any way, directly or indirectly.

42. "RCWC" shall have the meaning provided in section 1.1.134 of the Debtor's Plan.

43. "Reorganized Debtor" shall have the meaning provided in Section 1.1.144 of the Debtor's Plan.

44. "Survivors' Trust Distribution Plan" shall have the meaning provided in Section 1.1.156 of the Debtor's Plan.

45. "Survivors' Trust Documents" shall have the meaning provided in Section 1.1.157 of the Debtor's Plan.

46. "Survivors' Trustee" shall have the meaning provided in Section 1.1.158 of the Debtor's Plan.

47. "Unknown Abuse Claims Representative" shall have the meaning provided in Section 1.1.172 of the Debtor's Plan.

**INSTRUCTIONS**

The preceding Definitions apply to each of these Instructions, and for the purposes of these Interrogatories, the following Instructions shall be followed:

1. Federal Rule of Civil Procedure 33, made applicable to this proceeding pursuant to Federal Rules of Bankruptcy Procedure 7033 and 9014(c), is hereby incorporated by reference and applies to each of the following instructions.

2. All responses shall comply with the requirements of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Local Rules of the United States Bankruptcy Court for the Northern District of California.

3. Unless otherwise stated in a specific Interrogatory herein, the relevant time period for the discovery being sought shall be the period from the inception of the RCBO to the present.

4. Identify each Document and oral Communication which forms the basis in whole or in part for the answer given or which corroborates the answer given or the substance of which is given.

5. These Interrogatories shall be deemed continuing in nature. In the event You become aware of or acquire additional information relating or referring to any of the following Interrogatories, Your responses to those Interrogatories shall be supplemented promptly.

6. State whether the information furnished is within Your personal knowledge and, if not, identify each Person to whom the information is a matter of personal knowledge, if known.

7. If any part of the following Interrogatories cannot be responded to in full, please respond to the extent possible, specifying the reason(s) for Your inability to respond to the



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 35 of 90

remainder and stating whatever information or knowledge You have concerning the portion to which You do not respond.

8. If the answer to an Interrogatory is not presently known or available to the affiant, so state, and in addition, respond to the entire Interrogatory by supplemental answer in writing and under oath from time to time thereafter, within 10 days after the date on which such answer becomes known to the affiant.

9. If an Interrogatory or portion thereof requests information already provided in response to an earlier Interrogatory, you may respond by specifying the Document, or portion thereof, which contains the information sought.

10. If You contend that a response to an Interrogatory calls for privileged information, in whole or in part, or contend that any part of Your answer would be excludable from production in discovery, please specify: (i) that information is being withheld; (ii) the information being withheld with sufficient particularity to enable the party propounding these Interrogatories to bring the matter before the Court for a ruling on such a claim; (iii) the identity of each Person having knowledge of the factual basis and the individual documents, if any, on which the privilege or other ground is asserted; and (iv) the legal basis for the assertion of the claim of privilege.

11. If You object to any of these Interrogatories, state in writing with specificity the grounds of Your objections. Any ground not stated shall be waived. If You object to a particular portion of any Interrogatory, You shall respond to any other portions of such Interrogatory as to which there is no objection and state with specificity the grounds of the objection.

12. Please furnish all non-privileged information which is based on Your own personal knowledge or which is in the possession of Your attorneys or agents of any kind whatsoever. If You cannot answer any portion of the question, please specify the reasons You cannot provide an answer. If any information requested is not in Your possession, but is known or believed to be in


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 36 of 90

the possession of another person or entity, then identify that person or entity and state the basis of Your belief or knowledge that the requested information is in such person's or entity's possession. You are expected, however, to take all necessary steps to secure the information which is responsive to the Interrogatories.

**INTERROGATORIES**

**INTERROGATORY 1:** Identify all Persons considered and/or currently being considered for the role of Survivors' Trustee, and for each such Person identify who, if anyone, from the Debtor and/or counsel for Abuse Claimants interviewed and/or will interview the Person and the criteria used to evaluate that Person.

**INTERROGATORY 2:** Identify all Persons considered and/or being considered for the role of Abuse Claims Reviewer and for each such Person identify who, if anyone, from the Debtor and/or counsel for Abuse Claimants interviewed and/or will interview the Person and the criteria used to evaluate that Person.

**INTERROGATORY 3:** Describe in detail the principal facts supporting the statement in page 5 of the Debtor's Disclosure Statement that "The Modified Fourth Amended Plan—chiefly, but not exclusively, Article VIII thereof—reflects, in the Debtor's view, the agreed-upon term sheet with the Insurers reached in November 2024."

**INTERROGATORY 4:** Identify all of the Survivors' Trustee's and Abuse Claims Reviewer's connections with the Debtor, creditors, any other party in interest, their respective attorneys or accountants, the United States trustee, or any Person employed in the office of the United States Trustee as set forth in Rule 2014 of the Federal Rules of Bankruptcy Procedure.

**INTERROGATORY 5:** Identify whether the Survivors' Trust and/or the Survivors' Trustee could present, prosecute or otherwise pursue any Abuse Claim, other than a


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 37 of 90

Litigation Claim, against any Non-Settling Insurer for payment under the Debtor's Plan, and under what process, if any, such Abuse Claim could be presented.

**INTERROGATORY 6:** Identify whether the Survivors' Trust and/or the Survivors' Trustee could present, prosecute or otherwise pursue any Insurance Action arising out of, or for any reason related to, an Abuse Claim held by an Abuse Claimant who timely elects to receive the Immediate Payment, and under what process, if any, such Insurance Action could be presented.

**INTERROGATORY 7:** Identify whether the Survivors' Trustee could direct, participate, and/or associate in the prosecution of Litigation Claims, and the extent of the Survivors' Trustee's authority to decide matters related to case strategy, settlement, and timing of the Litigation Claim being released to the tort system.

**INTERROGATORY 8:** Identify whether the Survivors' Trustee could request that the Abuse Claims Reviewer re-evaluate any Trust Claim for the purpose of adjusting the numerical scaling factors and/or the percentage of the Survivors' Trust recovery pool allocated to the Trust Claim, and if so, describe in detail: (a) when such a request may be made; (c) under what criteria; (d) whether such request may be made before an Initial Determination; (e) whether such request may be made before or after any Abuse Claimant requests an additional review; and (f) whether such request is reviewable by any court or other Person.

**INTERROGATORY 9:** Identify whether the following parties waive their right to assert any claims relating in any way to Abuse Claims (other than Litigation Claims) or the handling thereof, against any Certain Insurer under the Plan: (i) the Survivors' Trust, (ii) the Survivors' Trustee, (iii) the Debtor, (iv) the Reorganized Debtor, (v) each and every Non-Debtor Catholic Entity, (vi) the RCWC, (vii) each and every of the Churches, (vii) the Unknown Abuse Claims Representative, (viii) Abuse Claimants, (ix) each and every Related Person for the

foregoing parties, and (x) each and every Person that claims rights in, to, or under any of the Certain Insurers' Abuse Insurance Policies. To the extent any such party retains their right to assert any claim relating in any way to an Abuse Claim (other than Litigation Claims) or the handling thereof against any of the Certain Insurers, please identify under which circumstance(s) such claim could be asserted against any Certain Insurer.

**INTERROGATORY 10:** Identify each duty, burden, responsibility, and/or obligation held by the Survivors' Trust under any Abuse Insurance Policy upon the effectiveness of the Insurance Assignment under Section 8.1.3 of the Debtor's Plan.

**INTERROGATORY 11:** Identify each duty, burden, responsibility and/or obligation held by the Debtor, the Reorganized Debtor or the Released Parties under any Abuse Insurance Policy upon the effectiveness of the Insurance Assignment under Section 8.1.3 of the Debtor's Plan.

**INTERROGATORY 12:** Identify each duty, burden, responsibility and/or obligation held by RCWC under any Abuse Insurance Policy upon the effectiveness of the Insurance Assignment under Section 8.1.3 of the Debtor's Plan.

**INTERROGATORY 13:** Identify each and every fact witness the Debtor intends and/or presently anticipates to call at any hearing on confirmation of the Debtor's Plan, and for each such witness, describe in detail the subject matter of the Person's anticipated testimony.

**INTERROGATORY 14:** Identify the process by which Litigation Claimants may request and obtain "Document Access" pursuant to Section 12.8 of the Plan, including: (b) to whom such a request must be submitted; (c) what form, timing, and content, if any, such a request must have; (d) what categories of information the Debtor contends are included within "all non-privileged information previously provided by the Debtor to the Debtor bearing on the Debtor's liability for Abuse Claims"; (e) what privilege, confidentiality, and/or protective-order review, if


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 39 of 90

any, will be conducted before such information is provided; (f) the process, if any, by which information previously provided by the Debtor to the Debtor will come into the possession, custody, or control of the Survivors' Trust; and (g) who will have final decision-making authority with respect to disputes concerning whether particular information must be provided to a Litigation Claimant.

**INTERROGATORY 15:** Identify what, if any, claims asserted in the Coverage Action You contend do not constitute Debtor Extracontractual Insurance Actions and describe in detail how and by whom those claims will be asserted after the Effective Date.



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 40 of 90

Dated: April 6, 2026.

By: */s/ Harris B. Winsberg*

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Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 42 of 90

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Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 43 of 90

**CERTIFICATE OF SERVICE**

I, Brian Aton, declare:

I am over the age of 18 and not a party to this bankruptcy case. My business address is: Parker, Hudson, Rainer & Dobbs LLP, 303 Peachtree Street NE, Suite 3600, Atlanta, Georgia 30308.

I hereby certify that on April 6, 2026, a true and correct copy of the **CERTAIN INSURERS' FIRST SET OF INTERROGATORIES TO THE ROMAN CATHOLIC BISHOP OF OAKLAND** was served on the following parties via electronic mail:

Counsel for the Debtor: Eileen R. Ridly, eridley@foley.com; Shane J. Moses, smoses@foley.com; Ann Marie Uetz, auetz@foley.com; Matthew D. Lee, mdlee@foley.com; Geoffrey S. Goodman, ggoodman@foley.com; Mark C. Moore, mmoore@foley.com; Thomas F. Carlucci, tcarlucci@foley.com; Emil Khatchatourian, ekhatchatourian@foley.com.

Counsel for the Committee: Jeffrey D. Prol, jprol@lowenstein.com; Brent Weisenberg, BWeisenberg@lowenstein.com; Jeffrey Cohen, jcohen@lowenstein.com; Lynda A. Bennett, lbennett@lowenstein.com; Michael A. Kaplan, MKaplan@lowenstein.com; Eric Jesse, ejesse@lowenstein.com; Colleen M. Restel, crestel@lowenstein.com; Tobias S. Keller, tkeller@kbkllp.com; Jane Kim, jkim@kbkllp.com; Gabrielle L. Albert, galbert@kbkllp.com; Timothy Burns, tburns@burnsbair.com; Jesse Bair, jbair@burnsbair.com.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 6, 2026.

*/s/ Brian Aton*
Brian Aton



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 46 of 90

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**UNITED STATES BANKRUPTCY COURT**
**NORTHERN DISTRICT OF CALIFORNIA**
**OAKLAND DIVISION**

| | |
|---|---|
| In re:<br><br>THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,<br><br>Debtor. | Case No. 23-40523-WJL<br><br>Chapter 11 |

**CERTAIN INSURERS' FIRST SET OF INTERROGATORIES TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, as made applicable herein by Federal Rules of Bankruptcy Procedure 7026 and 7034, Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation ("Westport"); Continental Casualty Company ("Continental"); Travelers Casualty and Surety Company f/k/a Aetna Casualty & Surety Company ("Travelers"); Insurance Company of North America, Westchester Fire Insurance Company, Pacific Indemnity Company, and Pacific Employers Insurance Company (together "INA"); and London Market Insurers[1] ("LMI", and collectively with Westport, Continental, Travelers and INA, the "Certain Insurers") by and through their undersigned counsel, hereby serve the following interrogatories (the "Interrogatories") in connection with *The Official Committee of Unsecured Creditors' Committee's Plan of Reorganization, Dated March 27, 2026* (the "Committee's Plan") [Docket No. 2752] of the Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland, appointed by the U.S. Trustee in the above-captioned Chapter 11 case (the "Committee").

The Certain Insurers hereby request the Committee fully answer the following interrogatories (each, a "Interrogatory" and collectively, the "Interrogatories") in writing, and serve a copy of its responses and objections upon undersigned counsel for the Certain Insurers, no later than 5:00 p.m. PT on April 13, 2026. In responding to these Interrogatories, the Committee is to obtain and furnish all documents available to its representatives, employees, agents, servants or attorneys. The Certain Insurers also request that You timely supplement Your responses to these

[1] London Market Insurers 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.).

Interrogatories as required by the Federal Rules of Bankruptcy Procedure and the Federal Rules of Civil Procedure.

**DEFINITIONS**

For the purposes of these Interrogatories, the following Definitions shall apply:

1. The words "all," "any," and "each" shall each be construed as encompassing any and all. The singular shall include the plural and vice versa; the terms "and" or "or" shall be both conjunctive and disjunctive; and the term "including" means "including without limitation." The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense. The singular and masculine form of nouns and pronouns shall embrace, and be read and applied as including, the plural, feminine or neuter, as circumstances may make appropriate. Unless otherwise stated, all capitalized terms used but not defined herein shall have the meaning ascribed to them in the Committee's Plan.

2. The words "all" or "any and all" documents or communications shall mean every document or communication which can be located or discovered by reasonably diligent effort, and which documents are within your possession, custody, or control (including, without limitation, documents within the possession, custody or control of your agents); documents that you have a legal right to obtain; documents that you have a right to copy or have access to; and documents that you have placed in the temporary possession, custody or control of any third person.

3. "Abuse Claim" shall have the meaning provided in Section 1.1.2 of the Committee's Plan.

4. "Abuse Claim Discharge Date" shall have the meaning provided in Section 1.1.1 of the Committee's Plan.

5. "Abuse Claimant" shall have the meaning provided in Section 1.1.3 of the Committee's Plan.

6. "Abuse Claims Reviewer" shall have the meaning provided in Section 1.1.4 of the Committee's Plan.

7. "Abuse Insurance Policies" shall have the meaning provided in Section 1.1.5 of the Committee's Plan.

8. "Assigned Insurance Interests" shall have the meaning provided in Section 1.1.15 of the Committee's Plan.

9. "Channeled Claim" shall have the meaning provided in Section 1.1.31 of the Committee's Plan.

10. "Certain Insurers' First Interrogatories" shall mean *Certain Insurers' First Interrogatories to the Official Committee of Unsecured Creditors* served contemporaneously herewith.

11. "Channeling Injunction" shall have the meaning provided in Section 1.1.32 of the Committee's Plan.

12. "Churches" shall have the meaning provided in Section 1.1.35 of the Committee's Plan.

13. "Committee," "You," or "Your" and variants thereof shall have the meaning provided in Section 1.1.42 of the Committee's Plan, and any attorneys, representatives, consultants, advisors, or anyone acting on the Committee's behalf.

14. "Committee's Plan" shall mean the *The Official Committee of Unsecured Creditors' Plan of Reorganization, Dated March 27, 2026* [Docket No. 2752] (as may be modified, amended, or supplemented from time to time).

15. "Communications" shall mean all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, notes, telegrams, correspondence, memoranda, emails, facsimile transmissions, or other form of verbal, written, mechanical, or electronic disclosure, in Your actual or constructive control or custody or in the control or custody of any current or former affiliates, representatives or advisors.

16. "Concerning" shall mean relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, constituting, describing, identifying, referring to, referencing, discussing, indicating, connected with or otherwise pertaining in any way, in whole or in part, to the subject matter being referenced.

17. "Confirmation Hearing" shall mean the hearing in the Bankruptcy Case to consider confirmation of the Committee's Plan.

18. "Confirmation Order" shall have the meaning set forth in Section 1.1.43 of the Committee's Plan.

19. "Debtor" and "RCBO" and variants thereof shall mean The Roman Catholic Bishop of Oakland, a California corporation sole, collectively or individually, as context requires and to encompass responsive documents from The Roman Catholic Bishop of Oakland, and any attorneys, representatives, consultants, advisors, or anyone acting on the RCBO's behalf.

20. "Documents" shall mean any writings, recordings, electronic files and emails, or photographs, whether original or duplicate, as defined in Federal Rule of Evidence 1001 and Federal Rule of Civil Procedure 34(a), inclusively, including (but not limited to) all documents and information in Your possession, custody, or control, and includes: all and any written, recorded, or graphic material, however produced or reproduced, minutes, summaries, memoranda, transcripts, tapes, or other voice recordings, and all other documents and tangible things, including booklets, brochures, pamphlets, circulars, notices, periodicals, papers, records, contracts, agreements,


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 51 of 90

photographs, minutes, memoranda, messages, appraisals, analyses, reports, files, interoffice memoranda, or interoffice communications of any description, calculations, invoices, accounting entries, diary entries, calendars, inventory sheets, ledgers, correspondence, emails, phone recordings, instant messages, text messages, telegrams, advertisements, press releases, notes, letters, diaries, working papers, schedules, projections, graphs, charts, films, tapes, print-outs, and all other data, whether recorded by electronic or other means, and all drafts thereof. If a Document was prepared in several copies, or if additional copies were thereafter made, and if any such copies are not identical in all respects or are no longer identical by reason of subsequent notation or modification of any kind whatsoever, including notes on the front or back, in the margins, or on any of the pages thereof, then each such non-identical copy is a separate Document and must be produced. When examples of categories or types of Documents are given in a particular Request by use of phrases such as "including," this shall always be interpreted as being for illustrative purposes only (*i.e.*, to be understood as "including without limitation") and in no way limits or narrows the scope of any Request. "Documents" always includes Communications, whether so stated in a particular Request or not.

21. "Effective Date" shall have the meaning provided in Section 1.1.60 of the Committee's Plan.

22. "Entity" shall have the meaning provided in Section 1.1.61 of the Committee's Plan

23. "Final Determination" shall have the meaning provided in Section 1.1.73 of the Committee's Plan.

24. The terms "identify," "identity," "state the identity," and "identification" shall mean:

(a) When used in reference to an individual, his or her (i) full name, (ii) present or last known home address and telephone numbers, (iii) present or last known business address and

telephone numbers, and (iv) present or last known occupation, employer and job title or description (indicating whether the information provided is "current" or "last known" in each instance);

(b) When used in reference to an organization of any kind, (i) its full name, (ii) or other entity, (iii) its date and state of incorporation (if applicable), (iv) the address of its principal place of business and its telephone numbers, (v) each state in which it is registered or authorized to do business and the date on which it was first so registered or authorized, (vi) each state in which it was, but is no longer, registered or authorized to do business, the date on which it was first so registered or authorized, and the date on which it ceased to be so registered or authorized, (vii) the name and current or last known address of each person who currently serves as an officer or director (if applicable) together with the title held by each such person and the date from which such title has been held, (viii) whether it is currently active and, if not, the date on which and reason for which it ceased doing business, (ix) whether it is currently in good standing in each state in which it is incorporated or registered or authorized to do business, (x) the address and phone number of each other location at which it currently does business and the date on which it commenced doing business at that location, and (xi) the address and phone number of each location at which it did business in the past, but at which it currently does not operate, and the dates between which it did business at each such location;

(c) When used in reference to a Document, (i) the type of Document, (ii) its date, (iii) the identity of its author(s) and its recipient(s), (iv) any title and/or serial or file number appearing on the Document, (v) the identity of its present custodian, (vi) its present location, and (vii) a brief description of its subject matter. If any such Document was, but is no longer in Your possession or control or in existence, state whether it is missing, lost, has been destroyed, has been transferred to others or has been otherwise disposed of; and



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 53 of 90

(d) When used in reference to an oral communication, (i) the date, place or places, and parties to the oral communication or some other means of identifying the oral communication; (ii) the substance of the oral communication; (iii) the medium through which the oral communication was made (in person or by telephone or video conference); (iv) each person who participated in the oral communication; (v) each person hearing the oral communication; and (vi) whether any written note or memorandum documenting the oral communication exists in the manner required to identify a Document as defined above.

25. "Immediate Payment" shall have the meaning provided in Sections 1.1.82 of the Committee's Plan.

26. "Initial Determination" shall have the meaning provided in Sections 1.1.85 of the Committee's Plan.

27. "Insurance Assignment" shall have the meaning provided in Sections 1.1.89 of the Committee's Plan.

28. "Insurance Claims" shall have the meaning provided in Section 1.1.90 of the Committee's Plan.

29. "Litigation Claimant" shall have the meaning provided in Section 1.1.100 of the Committee's Plan.

30. "Non-Debtor Catholic Entity" shall have the meaning provided in Section 1.1.110 of the Committee's Plan.

31. "Non-Settling Insurer" shall have the meaning provided in Section 1.1.112 of the Committee's Plan.

32. "Person" shall have the meaning provided in Section 1.1.115 of the Committee's Plan.



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 54 of 90

33. "Plan Documents" shall have the meaning provided in Section 1.1.117 of the Committee's Plan.

34. "Plan Supplement" shall have the meaning provided in Section 1.1.119 of the Committee's Plan.

35. The phrase "possession, custody, or control" shall be construed in the broadest possible manner and includes not only those things in the Committee's immediate possession, but also those things which are subject to its control.

36. The terms "regarding," "relating to," or "evidencing" shall mean relating to, referring to, reflecting, tending to establish, recording, memorializing, constituting, supporting, mentioning, or concerning in any way, directly or indirectly.

37. "RCWC" shall have the meaning provided in section 1.1.139 of the Committee's Plan.

38. "Reorganized Debtor" shall have the meaning provided in Section 1.1.144 of the Committee's Plan.

39. "Survivors' Trust Distribution Plan" shall have the meaning provided in Section 1.1.155 of the Committee's Plan.

40. "Survivors' Trust Documents" shall have the meaning provided in Section 1.1.156 of the Committee's Plan.

41. "Survivors' Trustee" shall have the meaning provided in Section 1.1.158 of the Committee's Plan.

42. "Unknown Abuse Claims Representative" shall have the meaning provided in Section 1.1.171 of the Committee's Plan.

**INSTRUCTIONS**



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 55 of 90

The preceding Definitions apply to each of these Instructions, and for the purposes of these Interrogatories, the following Instructions shall be followed:

1. Federal Rule of Civil Procedure 33, made applicable to this proceeding pursuant to Federal Rules of Bankruptcy Procedure 7033 and 9014(c), is hereby incorporated by reference and applies to each of the following instructions.

2. All responses shall comply with the requirements of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Local Rules of the United States Bankruptcy Court for the Northern District of California.

3. Unless otherwise stated in a specific Interrogatory herein, the relevant time period for the discovery being sought shall be the period from the inception of the RCBO to the present.

4. Identify each Document and oral Communication which forms the basis in whole or in part for the answer given or which corroborates the answer given or the substance of which is given.

5. These Interrogatories shall be deemed continuing in nature. In the event You become aware of or acquire additional information relating or referring to any of the following Interrogatories, Your responses to those Interrogatories shall be supplemented promptly.

6. State whether the information furnished is within Your personal knowledge and, if not, identify each Person to whom the information is a matter of personal knowledge, if known.

7. If any part of the following Interrogatories cannot be responded to in full, please respond to the extent possible, specifying the reason(s) for Your inability to respond to the remainder and stating whatever information or knowledge You have concerning the portion to which You do not respond.

8. If the answer to an Interrogatory is not presently known or available to the affiant, so state, and in addition, respond to the entire Interrogatory by supplemental answer in writing and

under oath from time to time thereafter, within 10 days after the date on which such answer becomes known to the affiant.

9. If an Interrogatory or portion thereof requests information already provided in response to an earlier Interrogatory, you may respond by specifying the Document, or portion thereof, which contains the information sought.

10. If You contend that a response to an Interrogatory calls for privileged information, in whole or in part, or contend that any part of Your answer would be excludable from production in discovery, please specify: (i) that information is being withheld; (ii) the information being withheld with sufficient particularity to enable the party propounding these Interrogatories to bring the matter before the Court for a ruling on such a claim; (iii) the identity of each Person having knowledge of the factual basis and the individual documents, if any, on which the privilege or other ground is asserted; and (iv) the legal basis for the assertion of the claim of privilege.

11. If You object to any of these Interrogatories, state in writing with specificity the grounds of Your objections. Any ground not stated shall be waived. If You object to a particular portion of any Interrogatory, You shall respond to any other portions of such Interrogatory as to which there is no objection and state with specificity the grounds of the objection.

12. Please furnish all non-privileged information which is based on Your own personal knowledge or which is in the possession of Your attorneys or agents of any kind whatsoever. If You cannot answer any portion of the question, please specify the reasons You cannot provide an answer. If any information requested is not in Your possession, but is known or believed to be in the possession of another person or entity, then identify that person or entity and state the basis of Your belief or knowledge that the requested information is in such person's or entity's possession. You are expected, however, to take all necessary steps to secure the information which is responsive to the Interrogatories.



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 57 of 90

**INTERROGATORIES**

**INTERROGATORY 1:** Identify all Persons considered and/or currently being considered for the role of Survivors' Trustee, and for each such Person identify who, if anyone, from the Committee and/or counsel for Abuse Claimants interviewed and/or will interview the Person and the criteria used to evaluate that Person.

**INTERROGATORY 2:** Identify all Persons considered and/or being considered for the role of Abuse Claims Reviewer and for each such Person identify who, if anyone, from the Committee and/or counsel for Abuse Claimants interviewed and/or will interview the Person and the criteria used to evaluate that Person.

**INTERROGATORY 3:** Identify all facts that support the Committee's assertion in Article III.7(ii) of its Disclosure Statement that there will be "an independent claim reviewer."

**INTERROGATORY 4:** Identify all of the Survivors' Trustee's and Abuse Claims Reviewer's connections with the Debtor, creditors, any other party in interest, their respective attorneys or accountants, the United States trustee, or any Person employed in the office of the United States Trustee as set forth in Rule 2014 of the Federal Rules of Bankruptcy Procedure.

**INTERROGATORY 5:** Identify whether the Survivors' Trust and/or the Survivors' Trustee could present, prosecute or otherwise pursue any Abuse Claim, other than a Litigation Claim, against any Non-Settling Insurer for payment under the Committee's Plan, and under what process, if any, such Abuse Claim could be presented.

**INTERROGATORY 6:** Identify whether the Survivors' Trust and/or the Survivors' Trustee could present, prosecute or otherwise pursue any Insurance Claim arising out of, or for any reason related to, an Abuse Claim held by an Abuse Claimant who timely elects to

receive the Immediate Payment, and under what process, if any, such Insurance Claim could be presented.

**INTERROGATORY 7:** Identify whether the Survivors' Trustee could direct, participate, and/or associate in the prosecution of Litigation Claims, and the extent of the Survivors' Trustee's authority to decide matters related to case strategy, settlement, and timing of the Litigation Claim being released to the tort system, including the "selection criteria" the Survivors' Trustee shall apply as referenced in Section 8.2.3 of the Committee's Plan.

**INTERROGATORY 8:** Identify whether the Survivors' Trustee could request that the Abuse Claims Reviewer re-evaluate any Trust Claim for the purpose of adjusting the numerical scaling factors and/or the percentage of the Survivors' Trust recovery pool allocated to the Trust Claim, and if so, describe in detail: (a) when such a request may be made; (c) under what criteria; (d) whether such request may be made before an Initial Determination; (e) whether such request may be made before or after any Abuse Claimant requests an additional review; and (f) whether such request is reviewable by any court or other Person.

**INTERROGATORY 9:** Identify whether the following parties waive their right to assert any claims relating in any way to Abuse Claims (other than Litigation Claims) or the handling thereof, against any Certain Insurer under the Plan: (i) the Survivors' Trust, (ii) the Survivors' Trustee, (iii) the Debtor, (iv) the Reorganized Debtor, (v) each and every Non-Debtor Catholic Entity, (vi) the RCWC, (vii) each and every of the Churches, (vii) the Unknown Abuse Claims Representative, (viii) Abuse Claimants, (ix) each and every Related Person for the foregoing parties, and (x) each and every Person that claims rights in, to, or under any of the Certain Insurers' Abuse Insurance Policies. To the extent any such party retains their right to assert any claim relating in any way to an Abuse Claim (other than Litigation Claims) or the handling thereof

against any of the Certain Insurers, please identify under which circumstance(s) such claim could be asserted against any Certain Insurer.

**INTERROGATORY 10:** Identify each duty, burden, responsibility, and/or obligation held by the Survivors' Trust under any Abuse Insurance Policy upon the effectiveness of the Insurance Assignment under Section 8.1.3 of the Committee's Plan.

**INTERROGATORY 11:** Identify each duty, burden, responsibility and/or obligation held by the Debtor, the Reorganized Debtor or the Released Parties under any Abuse Insurance Policy upon the effectiveness of the Insurance Assignment under Section 8.1.3 of the Committee's Plan.

**INTERROGATORY 12:** Identify each duty, burden, responsibility and/or obligation held by RCWC under any Abuse Insurance Policy upon the effectiveness of the Insurance Assignment under Section 8.1.3 of the Committee's Plan, as if RCWC elected to make the RCWC Contribution.

**INTERROGATORY 13:** Identify each and every fact witness the Committee intends and/or presently anticipates to call at any hearing on confirmation of the Committee's Plan, and for each such witness, describe in detail the subject matter of the Person's anticipated testimony.

**INTERROGATORY 14:** Identify the process by which Litigation Claimants may request and obtain "Document Access" pursuant to Section 12.8 of the Plan, including: (b) to whom such a request must be submitted; (c) what form, timing, and content, if any, such a request must have; (d) what categories of information the Committee contends are included within "all non-privileged information previously provided by the Debtor to the Committee bearing on the Debtor's liability for Abuse Claims"; (e) what privilege, confidentiality, and/or protective-order review, if any, will be conducted before such information is provided; (f) the process, if any, by


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 60 of 90

which information previously provided by the Debtor to the Committee will come into the possession, custody, or control of the Survivors' Trust; and (g) who will have final decision-making authority with respect to disputes concerning whether particular information must be provided to a Litigation Claimant.


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 61 of 90

Dated: April 6, 2026.

By: */s/ Harris B. Winsberg*

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Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 63 of 90

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**CERTIFICATE OF SERVICE**

I, Brian Aton, declare:

I am over the age of 18 and not a party to this bankruptcy case. My business address is: Parker, Hudson, Rainer & Dobbs LLP, 303 Peachtree Street NE, Suite 3600, Atlanta, Georgia 30308.

I hereby certify that on April 6, 2026, a true and correct copy of the **CERTAIN INSURERS' FIRST SET OF INTERROGATORIES TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS** was served on the following parties via electronic mail:

Counsel for the Debtor: Eileen R. Ridly, eridley@foley.com; Shane J. Moses, smoses@foley.com; Ann Marie Uetz, auetz@foley.com; Matthew D. Lee, mdlee@foley.com; Geoffrey S. Goodman, ggoodman@foley.com; Mark C. Moore, mmoore@foley.com; Thomas F. Carlucci, tcarlucci@foley.com; Emil Khatchatourian, ekhatchatourian@foley.com.

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Counsel for Certain Underwriters at Lloyd's, London and Certain London Market Insurers: Catalina Sugayan, Catalina.sugayan@clydeco.us; Clinton Cameron, Clinton.cameron@clydeco.us; Yongli Yang, Yongli.Yang@clydeco.us; Russell W. Roten, rroten@skarzynski.com; Jeff D. Kahane, jkahane@skarzynski.com; Nathan W. Reinhardt, nreinhardt@skarzynski.com; Timothy W. Evantson, tevanston@skarzynski.com.

Counsel for Continental Casualty Company: Miranda Turner, mturner@plevinturner.com; Jordan Hess, jhess@plevinturner.com; Mark Plevin, mplevin@plevinturner.com.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 6, 2026.

*/s/ Brian Aton*
Brian Aton



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 67 of 90

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**UNITED STATES BANKRUPTCY COURT**
**NORTHERN DISTRICT OF CALIFORNIA**
**OAKLAND DIVISION**

| | |
|---|---|
| In re:<br><br>THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,<br><br>Debtor. | Case No. 23-40523-WJL<br><br>Chapter 11 |

**CERTAIN INSURERS' FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, as made applicable herein by Federal Rules of Bankruptcy Procedure 7026 and 7034, Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation ("Westport"); Continental Casualty Company ("Continental"); Travelers Casualty and Surety Company f/k/a Aetna Casualty & Surety Company ("Travelers"); Insurance Company of North America, Westchester Fire Insurance Company, Pacific Indemnity Company, and Pacific Employers Insurance Company (together "INA"); and London Market Insurers[1] ("LMI", and collectively with Westport, Continental, Travelers and INA, the "Certain Insurers") by and through their undersigned counsel, hereby serve the following requests for the production of documents (the "Requests for Production") in connection with *The Official Committee of Unsecured Creditors' Plan of Reorganization, Dated March 27, 2026* (the "Committee's Plan") [Docket No. 2752] of the Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland, appointed by the U.S. Trustee in the above-captioned Chapter 11 case (the "Committee").

The Certain Insurers hereby request the Committee fully answer the following requests (each, a "Request" and collectively, the "Requests") in writing, and serve a copy of its responses and objections upon undersigned counsel for the Certain Insurers, by 5:00 p.m. PT on April 13, 2026. In responding to these Requests, the Committee is to obtain and furnish all documents available to its representatives, employees, agents, servants or attorneys. The Certain Insurers also request that You timely supplement Your responses to these Requests as required by the Federal

[1] London Market Insurers 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.).

Rules of Bankruptcy Procedure and the Federal Rules of Civil Procedure.

**DEFINITIONS**

For the purposes of these Requests, the following Definitions shall apply:

1. The words "all," "any," and "each" shall each be construed as encompassing any and all. The singular shall include the plural and vice versa; the terms "and" or "or" shall be both conjunctive and disjunctive; and the term "including" means "including without limitation." The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense. The singular and masculine form of nouns and pronouns shall embrace, and be read and applied as including, the plural, feminine or neuter, as circumstances may make appropriate. Unless otherwise stated, all capitalized terms used but not defined herein shall have the meaning ascribed to them in the Committee's Plan.

2. The words "all" or "any and all" documents or communications shall mean every document or communication which can be located or discovered by reasonably diligent effort, and which documents are within your possession, custody, or control (including, without limitation, documents within the possession, custody or control of your agents); documents that you have a legal right to obtain; documents that you have a right to copy or have access to; and documents that you have placed in the temporary possession, custody or control of any third person.

3. "Abuse Claim" shall have the meaning provided in Section 1.1.2 of the Committee's Plan.

4. "Abuse Claim Discharge Date" shall have the meaning provided in Section 1.1.1 of the Committee's Plan.

5. "Abuse Claimant" shall have the meaning provided in Section 1.1.3 of the Committee's Plan.

6. "Abuse Claims Reviewer" shall have the meaning provided in Section 1.1.4 of the Committee's Plan.

7. "Assigned Insurance Interests" shall have the meaning provided in Section 1.1.15 of the Committee's Plan.

8. "Abuse Insurance Policies" shall have the meaning provided in Section 1.1.5 of the Committee's Plan.

9. "Channeled Claim" shall have the meaning provided in Section 1.1.31 of the Committee's Plan.

10. "Certain Insurers' First Interrogatories" shall mean *Certain Insurers' First Interrogatories to the Official Committee of Unsecured Creditors* served contemporaneously herewith.

11. "Channeling Injunction" shall have the meaning provided in Section 1.1.32 of the Committee's Plan.

12. "Committee," "You," or "Your" and variants thereof shall have the meaning provided in Section 1.1.42 of the Committee's Plan, and any attorneys, representatives, consultants, advisors, or anyone acting on the Committee's behalf.

13. "Committee's Disclosure Statement" shall mean the *Disclosure Statement for the Official Committee of Unsecured Creditors' Plan of Reorganization, Dated March 27, 2026* [Docket No. 2753] (as may be modified, amended, or supplemented from time to time)

14. "Committee's Plan" shall mean *The Official Committee of Unsecured Creditors' Plan of Reorganization, Dated March 27, 2026* [Docket No. 2752] (as may be modified, amended, or supplemented from time to time).

15. "Communications" shall mean all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, notes,

telegrams, correspondence, memoranda, emails, facsimile transmissions, or other form of verbal, written, mechanical, or electronic disclosure, in Your actual or constructive control or custody or in the control or custody of any current or former affiliates, representatives or advisors.

16. "Concerning" shall mean relating to, evidencing, supporting, negating, refuting, embodying, containing, memorializing, comprising, reflecting, analyzing, constituting, describing, identifying, referring to, referencing, discussing, indicating, connected with or otherwise pertaining in any way, in whole or in part, to the subject matter being referenced.

17. "Confirmation Hearing" shall mean the hearing in the Bankruptcy Case to consider confirmation of the Committee's Plan.

18. "Debtor" and "RCBO" and variants thereof shall mean The Roman Catholic Bishop of Oakland, a California corporation sole, collectively or individually, as context requires and to encompass responsive documents from The Roman Catholic Bishop of Oakland, and any attorneys, representatives, consultants, advisors, or anyone acting on the RCBO's behalf.

19. "Documents" shall mean any writings, recordings, electronic files and emails, or photographs, whether original or duplicate, as defined in Federal Rule of Evidence 1001 and Federal Rule of Civil Procedure 34(a), inclusively, including (but not limited to) all documents and information in Your possession, custody, or control, and includes: all and any written, recorded, or graphic material, however produced or reproduced, minutes, summaries, memoranda, transcripts, tapes, or other voice recordings, and all other documents and tangible things, including booklets, brochures, pamphlets, circulars, notices, periodicals, papers, records, contracts, agreements, photographs, minutes, memoranda, messages, appraisals, analyses, reports, files, interoffice memoranda, or interoffice communications of any description, calculations, invoices, accounting entries, diary entries, calendars, inventory sheets, ledgers, correspondence, emails, phone recordings, instant messages, text messages, telegrams, advertisements, press releases, notes,


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 72 of 90

letters, diaries, working papers, schedules, projections, graphs, charts, films, tapes, print-outs, and all other data, whether recorded by electronic or other means, and all drafts thereof. If a Document was prepared in several copies, or if additional copies were thereafter made, and if any such copies are not identical in all respects or are no longer identical by reason of subsequent notation or modification of any kind whatsoever, including notes on the front or back, in the margins, or on any of the pages thereof, then each such non-identical copy is a separate Document and must be produced. When examples of categories or types of Documents are given in a particular Request by use of phrases such as "including," this shall always be interpreted as being for illustrative purposes only (*i.e.*, to be understood as "including without limitation") and in no way limits or narrows the scope of any Request. "Documents" always includes Communications, whether so stated in a particular Request or not.

20. "Entity" shall have the meaning provided in Section 1.1.61 of the Committee's Plan

21. The terms "identify," "identity," "state the identity," and "identification" shall mean:

(a) When used in reference to an individual, his or her (i) full name, (ii) present or last known home address and telephone numbers, (iii) present or last known business address and telephone numbers, and (iv) present or last known occupation, employer and job title or description (indicating whether the information provided is "current" or "last known" in each instance);

(b) When used in reference to an organization of any kind, (i) its full name, (ii) or other entity, (iii) its date and state of incorporation (if applicable), (iv) the address of its principal place of business and its telephone numbers, (v) each state in which it is registered or authorized to do business and the date on which it was first so registered or authorized, (vi) each state in which it was, but is no longer, registered or authorized to do business, the date on which it was first so registered or authorized, and the date on which it ceased to be so registered or authorized, (vii) the


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 73 of 90

name and current or last known address of each person who currently serves as an officer or director (if applicable) together with the title held by each such person and the date from which such title has been held, (viii) whether it is currently active and, if not, the date on which and reason for which it ceased doing business, (ix) whether it is currently in good standing in each state in which it is incorporated or registered or authorized to do business, (x) the address and phone number of each other location at which it currently does business and the date on which it commenced doing business at that location, and (xi) the address and phone number of each location at which it did business in the past, but at which it currently does not operate, and the dates between which it did business at each such location;

(c) When used in reference to a Document, (i) the type of Document, (ii) its date, (iii) the identity of its author(s) and its recipient(s), (iv) any title and/or serial or file number appearing on the Document, (v) the identity of its present custodian, (vi) its present location, and (vii) a brief description of its subject matter. If any such Document was, but is no longer in Your possession or control or in existence, state whether it is missing, lost, has been destroyed, has been transferred to others or has been otherwise disposed of; and

(d) When used in reference to an oral communication, (i) the date, place or places, and parties to the oral communication or some other means of identifying the oral communication; (ii) the substance of the oral communication; (iii) the medium through which the oral communication was made (in person or by telephone or video conference); (iv) each person who participated in the oral communication; (v) each person hearing the oral communication; and (vi) whether any written note or memorandum documenting the oral communication exists in the manner required to identify a Document as defined above.

22. "Insurance Assignment" shall have the meaning provided in Sections 1.1.89 of the Committee's Plan.

23. "Insurance Claims" shall have the meaning provided in Section 1.1.90 of the Committee's Plan.

24. "Non-Debtor Catholic Entity" shall have the meaning provided in Section 1.1.110 of the Committee's Plan.

25. "Person" shall have the meaning provided in Section 1.1.115 of the Committee's Plan.

26. "Plan Documents" shall have the meaning provided in Section 1.1.117 of the Committee's Plan.

27. The phrase "possession, custody, or control" shall be construed in the broadest possible manner and includes not only those things in the Committee's immediate possession, but also those things which are subject to its control.

28. The terms "regarding," "relating to," or "evidencing" shall mean relating to, referring to, reflecting, tending to establish, recording, memorializing, constituting, supporting, mentioning, or concerning in any way, directly or indirectly.

29. "RCWC" shall have the meaning provided in Section 1.1.139 of the Committee's Plan.

30. "Solicitation Procedures" shall mean those procedures for the solicitation of the Committee's Plan set forth in the Committee's Disclosure Statement.

31. "Survivors' Trust" shall have the meaning provided in Section 1.1.157 of the Committee's Plan.

32. "Survivors' Trust Documents" shall have the meaning provided in Section 1.1.156 of the Committee's Plan.

33. "Survivors' Trust Distribution Plan" shall have the meaning provided in Section 1.1.155 of the Committee's Plan.

34. "Survivors' Trustee" shall have the meaning provided in Section 1.1.158 of the Committee's Plan.

35. "Unknown Abuse Claims Representative" shall have the meaning provided in Section 1.1.171 of the Committee's Plan.

**INSTRUCTIONS**

The preceding Definitions apply to each of these Instructions, and for the purposes of these Requests, the following Instructions shall be followed:

1. Federal Rule of Civil Procedure 34, made applicable to this proceeding pursuant to Federal Rule of Bankruptcy Rule 7034 and 9014(c), is hereby incorporated by reference and applies to each of the following instructions.

2. All responses shall comply with the requirements of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Local Rules of the United States Bankruptcy Court for the Northern District of California.

3. Unless otherwise stated in a specific Request herein, the relevant time period for the discovery being sought shall be the period from the inception of the Diocese to the present.

4. These Requests shall be deemed continuing in nature. In the event You become aware of or acquire additional information relating or referring to any of the following Requests, such additional information is to be promptly produced.

5. Produce all Documents and all other materials described below in Your actual or constructive possession, custody, or control, including in the possession, custody, or control of current or former employees, officers, directors, agents, agents' representatives, consultants, contractors, vendors, or any fiduciary or other third parties, wherever those Documents and materials are maintained, including on personal computers, PDAs, wireless devices, local area networks, application-based communications services (including, without limitation, Facebook

Messenger, Instant Bloomberg, WeChat, Kakao Talk, WhatsApp, Signal, iMessage, etc.), and web-based file hosting services (including, without limitation, Gmail, Yahoo, etc.). You must produce all Documents in Your possession, custody, or control, whether maintained in electronic or paper form and whether located on hardware owned and maintained by You or hardware owned and/or maintained by a third party that stores data on Your behalf.

6. Documents not otherwise responsive to these Requests for Production should be produced: (a) if such Documents mention, discuss, refer to, explain, or concern one or more Documents that are called for by these Requests for Production; (b) if such Documents are attached to, enclosed with, or accompanying Documents called for by these Requests for Production; or (c) if such Documents constitute routing slips, transmittal memoranda or letters, comments, evaluations, or similar materials.

7. Documents should include all exhibits, appendices, linked Documents, or otherwise appended Documents that are referenced in, attached to, included with, or are a part of the requested Documents.

8. If any Document, or any part thereof, is not produced based on a claim of attorney-client privilege, work-product protection, or any other privilege, then in answer to such Request for Production or part thereof, for each such Document, You must:

a. Identify the type, title and subject matter of the Document;

b. State the place, date, and manner of preparation of the Document;

c. Identify all authors, addresses, and recipients of the Document, including information about such persons to assess the privilege asserted; and

d. Identify the legal privilege(s) and the factual basis for the claim.

9. Documents should not contain redactions unless such redactions are made to protect information subject to the attorney-client privilege and/or work-product doctrine. In the event any

Documents are produced with redactions, a log setting forth the information requested in Instruction 8 above must be provided.

10. To the extent a Document sought herein was at one time, but is no longer, in Your actual or constructive possession, custody, or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred to others; and/or (d) has been otherwise disposed of. In each instance, identify the Document, state the time period during which it was maintained, state the circumstance and date surrounding authorization for such disposition, identify each person having knowledge of the circumstances of the disposition, and identify each person who had possession, custody, or control of the Document. Documents prepared prior to, but which relate or refer to, the time period covered by these Requests are to be identified and produced.

11. If any part of the following Requests cannot be responded to in full, please respond to the extent possible, specifying the reason(s) for Your inability to respond to the remainder and stating whatever information or knowledge You have concerning the portion to which You do not respond.

12. If You object to any of these Requests, state in writing with specificity the grounds of Your objections. Any ground not stated shall be waived. If You object to a particular portion of any Request, You shall respond to any other portions of such Request as to which there is no objection and state with specificity the grounds of the objection.

13. If the identify of Documents responding to a Request is not known, then that lack of knowledge must be specifically indicated in the response. If any information requested is not in Your possession, but is known or believed to be in the possession of another person or entity, then identify that person or entity and state the basis of Your belief or knowledge that the requested information is in such person's or entity's possession.

**MANNER OF PRODUCTION**



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 78 of 90

1. All Documents produced to the Certain Insurers shall be provided in either native file ("native") or single-page 300 dpi-resolution group IV TIF ("tiff") format as specified below, along with appropriately formatted industry-standard database loan files and accompanied by true and correct copies or representations of unaltered attendant metadata. Where Documents are produced in tiff format, each Document shall be produced along with a multi-page, Document-level searchable text file ("searchable text") as rendered by an industry-standard text extraction program in the case of electronic originals, or by an industry-standard Optical Character Recognition ("ocr") program in the case of scanned paper Documents. Searchable text of Documents shall not be produced as fielded data within the ".dat file" as described below.

2. Database Load Files and Production Media Structure: Database load files shall consist of: (i) a comma-delimited values (".dat") file containing: Production Document identifier information, data designed to preserve "parent and child" relationships within Document "families," reasonably accessible and properly preserved metadata (or bibliographic coding in the case of paper Documents), custodian or Document source information; and (ii) an Opticon ("opt") file to facilitate the loading of tiff images.

3. Load files should be provided in a root-level folder named "Data," images shall be provided within a root level "Images" folder containing reasonably structured subfolders, and searchable text files shall be provided in a single root-level "Text" folder.

4. Electronic Documents and Data, Generally: Documents and other responsive data or materials created, stored, or displayed on electronic or electro-magnetic media shall be produced in the order in which the Documents are or were stored in the ordinary course of business, including all reasonably accessible metadata, custodian or Document source information, and searchable text so as to allow the Certain Insurers, through a reasonable and modest effort, to fairly, accurately,


Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 79 of 90

and completely access, search, display, comprehend, and assess the Documents' true and original content.

5. Emails and Attachments, and Other Email Account-Related Documents: All Documents and accompanying metadata created and/or stored in the ordinary course of business within commercial, off-the-shelf email systems, including, but not limited to Microsoft ExchangeTM, Lotus NotesTM, or Novell GroupwiseTM shall be produced in tiff format, accompanying metadata, and searchable text files or, alternatively, in a format that fairly, accurately, and completely represents each Document in such a manner as to make the Document(s) reasonably useable, manageable, and comprehendible by the Certain Insurers.

6. Documents and Data Created or Stored in or by Structured Electronic Databases: With the exclusion of email and email account-related Documents and data, all Documents and accompanying metadata created and/or stored in structured electronic databases or files shall be produced in a format that enables the Certain Insurers to reasonably manage and import those Documents into a useable, coherent database. Documents must be accompanied by reasonably detailed documentation explaining the Documents' content and format, including, but not limited to, data dictionaries and diagrams. Some acceptable formats, if and only if provided with definitive file(s), table(s), and field level schemas include:

a. XML format file(s);

b. Microsoft SQL database(s);

c. Access database(s); and/or

d. Fixed or variable length ASCII delimited files.

7. Spreadsheets, Multimedia, and Non-Standard File Types: All Documents generated or stored in software such as Microsoft Excel or other commercially available spreadsheet programs, as well as any multimedia files such as audio or video, shall be produced in their native

format, along with an accompanying placeholder image in tiff format indicating a native file has been produced. A "Nativelink" entry shall be included in the .dat load file indicating the relative path to each native file on the production media. To the extent You have other file types that do not readily or easily and accurately convert to tiff and searchable text, You may elect to produce those files in native format subject to the other requirements listed herein. Native files may be produced within a separate root-level folder structure on deliverable media entitled "Natives."

8. "Other" Electronic Documents: All other Documents and accompanying metadata and embedded data created or stored in unstructured files generated by commercially available software systems (excluding emails, structured electronic databases, spreadsheets, or multimedia) such as, but not limited to, word processing files (such as Microsoft Word), image files (such as Adobe .pdf files and other formats), and text files shall be produced in tiff and searchable text format in the order the files are or were stored in the ordinary course of business.

9. Paper Documents: Documents originally created or stored on paper shall be produced in tiff format. Relationships between Documents shall be identified within the Relativity .dat file utilizing document identifier numbers to express parent Document/child attachment boundaries, folder boundaries, and other groupings. In addition, the searchable text of each Document shall be provided as a multi-page text file as provided for by these Requests.

**REQUESTS FOR PRODUCTION**

**REQUEST NO. 1:** All Communications and Documents by and between You and/or Your counsel and any Abuse Claimant and/or any Abuse Claimant's counsel Concerning the Committee's Plan and/or the other Plan Documents.

**REQUEST NO. 2:** All Communications and Documents by and between You and/or Your counsel and the Debtor and/or its counsel Concerning the Committee's Plan and/or the other Plan Documents.

**REQUEST NO. 3:** All Communications and Documents by and between You and/or Your counsel and RCWC and/or its counsel Concerning the Committee's Plan and/or the other Plan Documents.

**REQUEST NO. 4:** All Communications and Documents by and between You and/or Your counsel and any Non-Debtor Catholic Entity and/or their counsel Concerning the Committee's Plan and/or the other Plan Documents.

**REQUEST NO. 5:** All Communications and Documents by and between You and/or Your counsel and the Unknown Abuse Claims Representative and/or its counsel Concerning the Committee's Plan and/or other Plan Documents.

**REQUEST NO. 6:** All Documents and Communications relating to the selection of, and qualifications of, the Survivors' Trustee or, if no Person has been chosen by the Committee, all Persons the Committee is considering for the role of Survivors' Trustee.

**REQUEST NO. 7:** All Documents and Communications relating to the selection of, and qualifications of, the Abuse Claims Reviewer, or, if no Person has been chosen by the Committee, all Persons the Committee is considering for the role of Abuse Claims Reviewer.

**REQUEST NO. 8:** All Documents and Communications between You and/or Your Counsel and the Survivors' Trustee and/or the Abuse Claims Reviewer Concerning their potential roles under the Plan and/or the other Plan Documents.

**REQUEST NO. 9:** All Documents and Communications Concerning the negotiation and drafting of the Survivors' Trust Distribution Plan and/or terms for allowing and/or valuing Abuse Claims against the Debtor.

**REQUEST NO. 10:** All Documents and Communications by and between You and/or Your counsel and the Debtor and/or its counsel Concerning Abuse Insurance Policies.

**REQUEST NO. 11:** All Documents and Communications Concerning the treatment of Abuse Claims set forth in Sections 4.4.3 and 4.4.4 of the Committee's Plan.

**REQUEST NO. 12:** All Documents and Communications Concerning the Insurance Assignment set forth in Section 8.1 of the Committee's Plan.

**REQUEST NO. 13:** All Documents and Communications Concerning the Insurance Coverage for Abuse Claims set forth in Section 8.2 of the Committee's Plan, including, but not limited to, the "selection criteria" that the Survivors' Trustee shall apply that is referenced in Section 8.2.3 of the Committee's Plan.

**REQUEST NO. 14:** All Documents and Communications Concerning the Preservation of Rights of Non-Settling Insurers set forth in Section 8.3 of the Committee's Plan.

**REQUEST NO. 15:** All Documents and Communications Concerning the Reductions in Non-Settling Insurers' Liability set forth in Section 8.7 of the Committee's Plan.

**REQUEST NO. 16:** All Documents and Communications Concerning the Survivors' Trust Assumption of Liabilities for Abuse Claims set forth in Section 9.6 of the Committee's Plan.

**REQUEST NO. 17:** All Documents and Communications Concerning the Method of Determination of Abuse Claims and Rights of Abuse Claimants to Choose to Pursue Litigation set forth in Section 9.8 of the Committee's Plan.

**REQUEST NO. 18:** All Documents and Communications Concerning the Document Access set forth in Section 12.8 of the Committee's Plan.

**REQUEST NO. 19:** All Documents and Communications Concerning the Abuse Claim Discharge Date set forth in Section 13.3.1 of the Committee's Plan.

**REQUEST NO. 20:** All Documents and Communications Concerning the Channeling Injunction set forth in Section 13.11 of the Committee's Plan.

**REQUEST NO. 21:** All Documents and Communications Concerning the feasibility of the Committee's Plan under Section 1129(a)(11) of the Bankruptcy Code.

**REQUEST NO. 22:** The Plan Documents, including the Survivors' Trust Documents, and all drafts, sections, exhibits, schedules, annexes, non-final versions, and other Documents that have been, are being, or are intended to be incorporated into, attached to, or filed as part of the Plan Documents, whether or not complete or in final form, and whether or not yet filed with the Court.

**REQUEST NO. 23:** All Documents You identified and/or relied upon in Your responses to the Certain Insurers' First Interrogatories.

**REQUEST NO. 24:** All Documents that You intend to introduce or rely upon at the Confirmation Hearing.

Dated: April 6, 2026.

By: */s/ Harris B. Winsberg*

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Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 86 of 90

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Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 87 of 90

**CERTIFICATE OF SERVICE**

I, Brian Aton, declare:

I am over the age of 18 and not a party to this bankruptcy case. My business address is: Parker, Hudson, Rainer & Dobbs LLP, 303 Peachtree Street NE, Suite 3600, Atlanta, Georgia 30308.

I hereby certify that on April 6, 2026, a true and correct copy of the **CERTAIN INSURERS' FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS** was served on the following parties via electronic mail:

Counsel for the Debtor: Eileen R. Ridly, eridley@foley.com; Shane J. Moses, smoses@foley.com; Ann Marie Uetz, auetz@foley.com; Matthew D. Lee, mdlee@foley.com; Geoffrey S. Goodman, ggoodman@foley.com; Mark C. Moore, mmoore@foley.com; Thomas F. Carlucci, tcarlucci@foley.com; Emil Khatchatourian, ekhatchatourian@foley.com.

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Counsel for Continental Casualty Company: Miranda Turner, mturner@plevinturner.com; Jordan Hess, jhess@plevinturner.com; Mark Plevin, mplevin@plevinturner.com.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 6, 2026.

*/s/ Brian Aton*
Brian Aton



Case: 23-40523 Doc# 3183-1 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 90 of 90

# Exhibit B

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**UNITED STATES BANKRUPTCY COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

In re:

THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,

Debtor.

Bankruptcy Case No.: 23-40523 WJL

Hon. William J. Lafferty

Chapter 11

**CERTAIN UNDERWRITERS AT LLOYD'S, LONDON AND CERTAIN LONDON MARKET INSURERS' REQUESTS FOR ADMISSIONS TO THE ROMAN CATHOLIC BISHOP OF OAKLAND PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 36**

Certain Underwriters at Lloyd's, London and certain London Market Insurers (collectively "London Market Insurers" or "LMI")[1] by and through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 36, made applicable by Federal Rule of Bankruptcy Procedure 7036, requests that The Roman Catholic Bishop of Oakland ("Debtor"), answer each of the following requests fully and separately in writing and serve those answers on counsel for LMI within thirty (30) days hereof:

**DEFINITIONS**

1. "**Document**" means any written, printed, typed, recorded, photographic, electronic, digitally stored, or graphic matter of any kind or description, whether original or copy, however produced or reproduced, including but not limited to emails, text messages, instant messages, social media posts, contracts, agreements, invoices, purchase orders, receipts, letters, memoranda, notes, reports, photographs, videos, audio recordings, spreadsheets, databases, logs, calendars, screenshots, and all drafts and metadata associated with any of the foregoing. The term "Document" does not include any Insurance Policy as defined herein.

2. "**Insurance Policy**" or "**Policy**" means the currently available Documents for each of the following insurance policies produced by LMI and/or You in this action, including all slips, declarations pages, insuring agreements, conditions, exclusions, endorsements, riders, and all other pages comprising the complete policy instrument, as identified by the Bates numbers set forth in each Request below: (1) Policy No. LM 26336/CU 1001 (First Excess Umbrella Policy); (2) Policy No. LM 26337/K 66034 (Second Excess Umbrella Policy); (3) Policy No. LM 29079/K 78138 (First Excess Umbrella Policy); and (4) Policy No. LM 29080/CU 3061 (Second Excess Umbrella Policy).

3. "**Authenticate**" or "**Authentication**" means to admit that a Document is what its proponent claims it to be, including but not limited to admitting one or more of the following as applicable: (a) the Document is a true and correct copy of the original; (b) the Document was made

[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.).



Case: 23-40523 Doc# 3183-2 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 3 of 6

at or about the time indicated; (c) the Document was kept in the course of a regularly conducted activity of a business; (d) making the Document was a regular practice of that activity; (e) the Document has not been altered or modified from the state in which it was created or kept; (f) the signatures, authorship, senders, recipients, and/or custodians are genuine; and (g) any Bates numbers accurately correspond to the referenced pages.

4. "**You**" or "**Your**" means The Roman Catholic Bishop of Oakland, a California corporation sole, including all of Your current and former officers, directors, members, managers, partners, employees, agents, representatives, in-house counsel, predecessors, successors, assigns, and anyone acting or purporting to act on Your behalf.

5. "**Request**" means each individual Request for Admission set forth below, including all subparts, and requires a separate response.

## INSTRUCTIONS

1. These Requests for Admission are propounded pursuant to Federal Rule of Civil Procedure 36. You must serve written answers or objections within (30) days after service of these Requests unless the Court orders otherwise or the parties stipulate to a different time.

2. Each Request must be answered separately and fully in writing under oath, signed by the party or by an officer or agent of the party who verifies the answers, as required by the Federal Rules.

3. If You do not admit a Request, Your answer must specifically deny it or state in detail why You cannot truthfully admit or deny it. A denial must fairly respond to the substance of the matter; when good faith requires that You qualify an answer or deny only a part, You must admit the part that is true and qualify or deny the rest.

4. If You lack knowledge or information as a basis for admitting or denying, You must state that You have made a reasonable inquiry and that the information You know or can readily obtain is insufficient to enable You to admit or deny.

5. If You object to a Request, state the specific grounds for the objection. If the Request is objectionable only in part, You must admit the part that is not objectionable and specify the part objected to.

6. These Requests are continuing in nature. If, after serving answers, You obtain or become aware of any additional information responsive to any Request, You must promptly supplement or amend Your answers as required by the Federal Rules.

7. References to Bates numbers refer to the unique identifiers affixed to Documents produced in this action. If a Bates range is provided, the Request refers to each page within that range.

8. For each Request concerning a Document, the term includes the original and all duplicates as defined in the Federal Rules of Evidence, and any exact copies.

9. The pronouns "he," "she," and "they," and the singular include the plural and vice versa where appropriate to make the Request inclusive rather than exclusive.

## REQUESTS FOR ADMISSIONS

**REQUEST FOR ADMISSION NO. 1**

Admit that the Documents bearing Bates Nos. Underwriters 0000001–Underwriters 0000009, RCBO-CC-0000001_0064–RCBO-CC-0000001_0092, and RCBO-CC-0000001_0093–RCBO-CC-0000001_0098, collectively constitute true and correct copies of the currently available Documents for Policy No. LM 29079/K 78138 (First Excess Umbrella Policy).

**REQUEST FOR ADMISSION NO. 2**

Admit that the Documents bearing Bates Nos. Underwriters 0000010–Underwriters 0000017, RCBO-CC-0000001_0034–RCBO-CC-0000001_0059, and RCBO-CC-0000001_0060–RCBO-CC-0000001_0063, collectively constitute true and correct copies of the currently available Documents for Policy No. LM 29080/CU 3061 (Second Excess Umbrella Policy).

**REQUEST FOR ADMISSION NO. 3**

Admit that the Documents bearing Bates Nos. Underwriters 0000018–Underwriters 0000020, Underwriters 0000021–Underwriters 0000035, RCBO-CC-0000003_0003–RCBO-CC-0000003_0006, and RCBO-CC-0000017_0007–RCBO-CC-0000017_0019, collectively constitute true and correct copies of the currently available Documents for Policy No. LM 26336/CU 1001 (First Excess Umbrella Policy).

**REQUEST FOR ADMISSION NO. 4**

Admit that the Documents bearing Bates Nos. Underwriters 0000036–Underwriters 0000042, Underwriters 0000043–Underwriters 0000048, and RCBO-CC-0000003_0007–RCBO-CC-0000003_0014, collectively constitute true and correct copies of the currently available Documents for Policy No. LM 26337/K 66034 (Second Excess Umbrella Policy).

**RESERVATION OF RIGHTS**

These Requests are without prejudice to propounding additional Requests, Interrogatories, or Requests for Production as permitted by the Federal Rules of Civil Procedure and any applicable scheduling order.

Dated: May 20, 2026

By: /s/ *Jeff D. Kahane*

Russell W. Roten
Jeff D. Kahane
Timothy W. Evanston
Isabelle Cho
**SKARZYNSKI MARICK & BLACK, LLP**
333 South Grand Avenue, Suite 3550
Los Angeles, California 90017
Telephone: (213) 721-0650
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Catalina J. Sugayan
Yongli Yang (*pro hac vice*)
**CLYDE & CO US LLP**
30 S Wacker Drive, Suite 2600
Chicago, IL 60606
Telephone: (312) 635-7000
Catalina.Sugayan@clydeco.us
Yongli.Yang@clydeco.us

*Attorneys for Certain Underwriters at Lloyd's, London, and Certain London Market Insurers*



Case: 23-40523 Doc# 3183-2 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 6 of 6

# Exhibit C

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

| | |
|---|---|
| In Re: | Case No. 23-40523 WJL |
| THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole, | Chapter 11 |
| Debtor. | |
| ----------/ | |

DEPOSITION OF

BISHOP MICHAEL C. BARBER

VOLUME 2

MONDAY, APRIL 27, 2026

9:07 a.m. PDT

Stenographically reported by:

LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC

California CSR No. 10523

Washington CSR No. 3318

Oregon CSR No. 19-0458

Texas CSR No. 11318

Hudson Job No.: 38020

California Firm Registration No.: 244

HUDSON COURT REPORTING & VIDEO (800) 310-1769

STENOGRAPHER'S CERTIFICATE

I, LORRIE L. MARCHANT, Certified Shorthand Reporter, Certificate No. 10523, for the State of California, hereby certify that BISHOP MICHAEL C. BARBER was by me duly sworn/affirmed to testify to the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein named; that the deposition is a true record of the witness's testimony as reported to the best of my ability by me, a duly certified shorthand reporter and a disinterested person, and was thereafter transcribed under my direction into typewriting by computer; that request [ ] was [ X ] was not made to read and correct said deposition.

I further certify that I am not interested in the outcome of said action, nor connected with, nor related to any of the parties in said action, nor to their respective counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 28th day of April, 2026



LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC

Stenographic Certified Shorthand Reporter #10523

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

| | |
|---|---|
| In Re: | Case No. 23-40523 WJL |
| THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole, | Chapter 11 |
| Debtor. | |

_____

DEPOSITION OF ATTILA BARDOS INDIVIDUALLY AND PURSUANT TO RULE 30(b)(6) ON BEHALF OF THE ROMAN CATHOLIC BISHOP OF OAKLAND

San Francisco, California

Tuesday, April 28, 2026

Volume IV

STENOGRAPHICALLY REPORTED BY:

REBECCA L. ROMANO, RPR, CSR, CCR

California CSR No. 12546

Nevada CCR No. 827

Oregon CSR No. 20-0466

Washington CCR No. 3491

PAGES 1 - 129

HUDSON COURT REPORTING & VIDEO (800) 310-1769

I, Rebecca L. Romano, a Registered Professional Reporter, Certified Shorthand Reporter, Certified Court Reporter, do hereby certify:

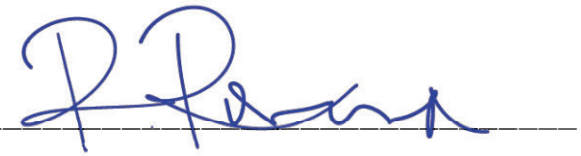
That the foregoing proceedings were taken before me at the time and place herein set forth; that any deponents in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made stenographically by me and which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [ ] was [X] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: April 29, 2026



Rebecca L. Romano, RPR, CCR

CSR. No 12546

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In Re: Case No. 23-40523 WJL

THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,

Debtor.

_____

The Deposition of DANIEL FLANAGAN

Taken Remotely Via Zoom

Detroit, Michigan

Volume II

Commencing at 8:14 a.m.

Tuesday, April 28, 2026

Before Mary Ann Scanlan, CA-CSR NO. 8875

RDR-CRR-CCRR-CLR

CONFIDENTIAL DESIGNATION

(TESTIMONY DESIGNATED CONFIDENTIAL FOR ATTORNEYS' EYES ONLY FROM PAGE 91, LINE 6 TO PAGE 98, LINE 9.)

STENOGRAPHIC REPORTER'S CERTIFICATE

I, MARY ANN SCANLAN, California CSR No. 8875, RDR-CRR-CCRR-CLR, do hereby certify that the foregoing transcript of testimony was taken by me in stenotype and thereafter reduced to print under my direction; that said transcript is a full, true and substantially accurate record of the proceedings, to the best of my ability.

I do further certify that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

Dated: April 29, 2026.

_____

MARY ANN SCANLAN, RDR-CRR-CCRR-CLR

California CSR No. 8875



Case: 23-40523 Doc# 3183-3 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 7 of 29

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

----------X.

In Re: Case No. 23-40523

THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,

Debtor.

Chapter 11

----------X.

DEPOSITION of

RONALD GIES

Thursday, April 30, 2026

1:03 p.m.

Reported Stenographically by:

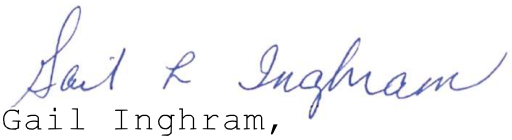
Gail L. Inghram,

BA, RDR, CRR, RSA, CA-CSR No. 8635

HUDSON COURT REPORTING & VIDEO (800) 310-1769

CERTIFICATE OF SHORTHAND REPORTER

I, Gail Inghram, Registered Diplomate Reporter, Certified Realtime Reporter, Realtime Systems Administrator, CA-Certified Shorthand Reporter No. 8635, and Notary Public, the officer before whom the foregoing proceedings were taken, do hereby certify that the foregoing transcript is a true and correct record of the proceedings; that said proceedings were taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.



Gail Inghram,

BA, RDR, CRR, RSA, CA-CSR No. 8635



Case: 23-40523 Doc# 3183-3 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 9 of 29

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

----------X.

In Re: Case No. 23-40523

THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,

Debtor.

Chapter 11

----------X.

# DEPOSITION OF

# ANDREW CURRIER

Thursday, April 30, 2026

9:14 A.M.

Reported Stenographically by:

Gail L. Inghram,

BA, RDR, CRR, RSA, CA-CSR No. 8635

HUDSON COURT REPORTING & VIDEO (800) 310-1769

CERTIFICATE OF SHORTHAND REPORTER

I, Gail Inghram, Registered Diplomate Reporter, Certified Realtime Reporter, Realtime Systems Administrator, CA-Certified Shorthand Reporter No. 8635, and Notary Public, the officer before whom the foregoing proceedings were taken, do hereby certify that the foregoing transcript is a true and correct record of the proceedings; that said proceedings were taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.



Gail Inghram,

BA, RDR, CRR, RSA, CA-CSR No. 8635

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

| | |
|---|---|
| In Re: | Case No. 23-40523 WJL |
| THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole, Debtor. | Chapter 11 |

---

# DEPOSITION OF

# MATTHEW BABCOCK, CPA, CFF, CFE, CIRA

THURSDAY, APRIL 30, 2026

9:05 a.m. PDT

Stenographically reported by:

LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC

California CSR No. 10523

Washington CSR No. 3318

Oregon CSR No. 19-0458

Texas CSR No. 11318

California Firm Registration No.: 244

HUDSON COURT REPORTING & VIDEO (800) 310-1769

STENOGRAPHER'S CERTIFICATE

I, LORRIE L. MARCHANT, Certified Shorthand Reporter, Certificate No. 10523, for the State of California, hereby certify that MATTHEW BABCOCK, CPA, CFF, CFE, CIRA was by me duly sworn/affirmed to testify to the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein named; that the deposition is a true record of the witness's testimony as reported to the best of my ability by me, a duly certified shorthand reporter and a disinterested person, and was thereafter transcribed under my direction into typewriting by computer; that request [ ] was [ X ] was not made to read and correct said deposition.

I further certify that I am not interested in the outcome of said action, nor connected with, nor related to any of the parties in said action, nor to their respective counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 1st day of May, 2026.



LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC

Stenographic Certified Shorthand Reporter #10523

# Deposition Transcript

Case Number: 23-40523-WJL
Date: May 6, 2026

In the matter of:

# IN RE: THE ROMAN CATHOLIC BISHOP OF OAKLAND

# ATTILA JOSEPH BARDOS - 30(b)(6)

CERTIFIED COPY

Reported by:
TERRI NESTORE




Steno
Agency, Inc.

315 West 9th Street
Suite 807
Los Angeles, CA 90015
concierge@steno.com
(888) 707-8366
NV: Firm #108F

C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/ Transcriptionist, do hereby certify that I was authorized to transcribe the foregoing recorded proceeding, and that the transcript is a true and accurate transcription, to the best of my ability, taken while listening to the provided recording.

I further certify that I am not of counsel or attorney for either or any of the parties to said proceedings, nor in any way interested in the events of this cause, and that I am not related to any of the parties thereto.

Dated this 9th day of May, 2026.

Terri Nestore
TERRI NESTORE, CSR 5614, RPR, CRR


Case: 23-40523 Doc# 3183-3 Filed: 06/10/26 Entered: 06/10/26 17:04:50 Page 15 of 29

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# Transcript of Katheryn McNally

**Date:** May 26, 2026
**Case:** The Roman Catholic Bishop of Oakland, In Re:

**Planet Depos**
**Phone:** 888.433.3767
**Email:** transcripts@planetdepos.com
**www.planetdepos.com**

I, Theresa A. Vorkapic, Certified Shorthand Reporter No. 084-2589, CSR, RMR, CRR, RPR, and a Notary Public in and for the County of Kane, State of Illinois, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me and thereafter reduced to typewriting under my direction; that reading and signing was not requested; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 26th day of May, 2026.

My commission expires November 6, 2027.

Theresa A Vorkapic

THERESA A. VORKAPIC

NOTARY PUBLIC IN AND FOR ILLINOIS

Planet Depos
We Make It Happen™

# Transcript of Paul Shields

**Date:** May 27, 2026
**Case:** The Roman Catholic Bishop of Oakland, In Re:

**Planet Depos**
**Phone:** 888.433.3767
**Email:** transcripts@planetdepos.com
**www.planetdepos.com**

CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

I, Theresa A. Vorkapic, Certified Shorthand Reporter No. 084-2589, CSR, RMR, CRR, RPR, and a Notary Public in and for the County of Kane, State of Illinois, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me and thereafter reduced to typewriting under my direction; that reading and signing was not requested; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 28th day of May, 2026.

My commission expires November 6, 2027.



THERESA A. VORKAPIC

NOTARY PUBLIC IN AND FOR ILLINOIS

# Transcript of Randi Rosen, MAI, MRICS, CRE

**Date:** May 28, 2026
**Case:** The Roman Catholic Bishop of Oakland, In Re:

**Planet Depos**
**Phone:** 888.433.3767
**Email:** transcripts@planetdepos.com
**www.planetdepos.com**

C E R T I F I C A T E

I, JENNIFER L. BERNIER, a Certified Shorthand Reporter, Registered Merit Reporter, Certified Realtime Reporter, in and for the state of Illinois, do hereby certify:

That the foregoing witness was by me duly sworn; that the videotaped deposition was then taken before me at the time and place herein set forth; that the testimony and proceedings were reported stenographically by me and later transcribed into typewriting under my direction; that the foregoing is a true record of the testimony and proceedings taken at that time.

IN WITNESS WHEREOF, I do hereunto set my hand of office at Chicago, Illinois, this May 29, 2026.



_____

My commission expires: May 31, 2027

C.S.R. Certificate No. 084.004190

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

---

The Deposition of CHARLES MOORE

Taken at 321 N. Clark Street, Suite 3000

Chicago, Illinois

Commencing at 9:34 a.m.

Thursday, May 28, 2026

Before Carolyn Grittini, CSR-3381

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- Trial Support

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844.730.4066

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CERTIFICATE OF NOTARY

STATE OF MICHIGAN )
) SS
COUNTY OF OAKLAND)

I, CAROLYN GRITTINI, certify that this deposition was taken before me on the date hereinbefore set forth; that the foregoing questions and answers were recorded by me stenographically and reduced to computer transcription; that this is a true, full and correct transcript of my stenographic notes so taken; and that I am not related to, nor of counsel to, either party nor interested in the event of this cause.

Carolyn Grittini

CAROLYN GRITTINI, CSR-3381
Notary Public,
Oakland County, Michigan
My Commission expires: July 15, 2029

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

| | | |
|---|---|---|
| In Re: | ) | Case No. |
| THE ROMAN CATHOLIC BISHOP | ) | 23-40523 WJL |
| OF OAKLAND, | ) | Chapter 11 |
| a California corporation | ) | |
| sole, | ) | |
| Debtor. | ) | |

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF THE ROMAN CATHOLIC BISHOP OF OAKLAND

REMOTE DEPOSITION OF

DR. KURT MARTENS, J.C.D.

Reported by: Debra Stevens, RPR,CRR

HUDSON COURT REPORTING & VIDEO (800) 310-1769

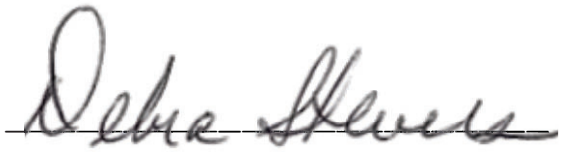
CERTIFICATION

I, DEBRA STEVENS, a Notary Public for and within the State of New York, do hereby certify:

That the witness whose testimony as herein set forth, was duly sworn by me; and that the within transcript is a true record of the testimony given by said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this ___ day of _____ 20__.



DEBRA STEVENS, RPR/CRR

* * *

# Transcript of Denise Martin, Ph.D.

**Date:** June 2, 2026
**Case:** The Roman Catholic Bishop of Oakland, In Re:

**Planet Depos**
**Phone:** 888.433.3767
**Email:** transcripts@planetdepos.com
**www.planetdepos.com**

CERTIFICATE OF SHORTHAND REPORTER

NOTARY PUBLIC

I, STANLEY H. SAKAI, CRC, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my direction; that reading and signing was requested [or not requested, as appropriate]; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 3RD day of JUNE, 2026.



STANLEY H. SAKAI, CRC

FOR THE STATE OF NEW YORK

My Commission Expires: JUNE 23, 2026

# Transcript of Matthew Babcock, Designated Representative

**Date:** June 3, 2026
**Case:** The Roman Catholic Bishop of Oakland, In Re:

**Planet Depos**
**Phone:** 888.433.3767
**Email:** transcripts@planetdepos.com
**www.planetdepos.com**

CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

I, Catherine Galati, the officer before whom the foregoing proceedings were taken, do hereby certify that the foregoing transcript is a true and correct record of the proceedings; that said proceedings were taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand this 4th day of June 2026.



_____

NOTARY PUBLIC IN AND FOR THE
STATE OF NEW YORK