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

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|---|---|
| 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' EVIDENTIARY OBJECTIONS TO DECLARATION OF ATTILA J. BARDOS IN SUPPORT OF CONFIRMATION OF DEBTOR'S MODIFIED FOURTH AMENDED PLAN OF REORGANIZATION**

Westport Insurance Corporation, f/k/a Employers Reinsurance Corporation ("Westport"), Continental Casualty Company ("CNA") and Pacific Indemnity Company, Century Indemnity Company as successor to CCC Insurance Company as successor to Insurance Company of North America, Pacific Employers Insurance Company, and Westchester Fire Insurance Company ("Pacific Insurers") (collectively, the "Certain Insurers"), hereby assert the following objections to the below portions of the Declaration of Attila J. Bardos in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization submitted by the Debtor. Certain

Insurers reserve the right to modify, amend or supplement their objections as appropriate, and reserve the right to object to any additional testimony, including live testimony, that the witness may offer.

| Declaration | Objection | Sustained | Overruled |
|---|---|---|---|
| 1. I am the Chief Financial Officer ("CFO") of the Roman Catholic Bishop of Oakland, a California corporation sole (the "Debtor" or "RCBO"). | | | |
| 2. I submit this declaration for purposes of streamlining my direct testimony that I intend to offer in person at the confirmation hearing beginning June 15, 2026, in support of the Debtor's Modified Fourth Amended Plan of Reorganization [Docket No. 2758] (or as later amended, modified, or supplemented, the "Plan"). If called upon to testify about the contents herein, I could and would testify competently to the facts set forth herein. I am authorized by the Debtor to submit this declaration. | | | |
| 3. I am the CFO of the Debtor, and have served in this capacity since approximately 2023, after the Petition Date of May 8, 2023. I succeeded Paul Bongiovanni as the Debtor's CFO. | | | |
| 4. In my role as CFO, I am responsible for overseeing the Debtor's financial operations, including management of the Debtor's assets, liabilities, financial reporting, and coordination with the Debtor's retained professionals in this Chapter 11 case, including counsel and financial advisors. I report directly to Bishop Michael C. Barber, S.J. | | | |
| 5. I also serve on the boards of Adventus, the Roman Catholic Welfare Corporation of Oakland ("RCWC"), and the Roman Catholic Cemetery Corporation ("RCC"). I am familiar with the contributions each entity is making under the Plan and the negotiations that led to those contributions. | | | |

| Declaration | Objection | Sustained | Overruled |
|---|---|---|---|
| 6. In my role as CFO, I have been deeply involved in the formulation, drafting, negotiation, and modification related to each iteration of the Debtor's plans of reorganization in this case, including the current Plan. I signed the Plan on behalf of the Debtor as an officer of the Diocese. I signed it because I have been very involved with the Plan's creation and each of its modifications over the past approximately 20 months, making me the logical person to execute it on the Diocese's behalf. | | | |
| 7. I understand the Plan includes an Insurance Assignment through which RCBO passes to the Survivors' Trust the ability to seek all available benefits under RCBO's insurance policies—not a transfer of the full policy, but the ability for each and every individual Survivor with an Allowed Claim who chooses the Litigation Option under the Plan to recover all available benefits and rights from the policy in state court. As I understand it, it is a transfer from RCBO to the Survivors' Trust for the benefit of each of the Survivors, because right now those insurance rights are RCBO's asset, and if the Plan is confirmed then individual Survivors with an Allowed Claim who exercise the Litigation Option are able to recover all available rights and benefits under the insurance policies. | Improper Opinion; Fed. R. Evid. 701-702; Hearsay, Fed. R. Evid. 802 | | |
| 8. The insurance-related documents identified on the Debtor's Exhibit List are true and authentic copies of insurance policies obtained by the Debtor over the course of several decades, and of documents evidencing the issuance of certain insurance policies to the Debtor. Based on my personal knowledge, these insurance policies and evidence of the insurance of policies have been maintained within the Debtor's records in the normal course of business since the issuance of each policy. | Hearsay, Fed. R. 802; Lacks foundation, Fed. R. Evid. 602 | | |
| 9. While insurance-related documents identified on the Debtor's Exhibit List reflect insurance coverage available to the Debtor, I cannot confirm whether or not these documents reflect the full and complete version of each insurance policy or the full and complete extent of insurance coverage available to the Debtor. | Hearsay, Fed. R. 802; Lacks foundation, Fed. R. Evid. 602 | | |

| Declaration | Objection | Sustained | Overruled |
|---|---|---|---|
| 10. I am personally familiar with the Plan, based on my role as CFO, my participation in the formulation and negotiation of the Plan, my review of the Plan and Plan Documents, and my communications with the Debtor's professionals, affiliated entities, and the Committee's representatives. I am prepared to testify as to my personal understanding of the Plan and underlying factual basis which demonstrates the Plan satisfies requirements of section 1129 of the Bankruptcy Code. | | | |

Dated: June 11, 2026

/*s*/ Blaise S. Curet

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2026, a copy of the foregoing 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.

Dated: June 11, 2026 /s/ S. Monique Belle