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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re: THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole, Debtor.	Case No. 23-40523 WJL Chapter 11 **NOTICE OF FILING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' OBJECTIONS TO THE DEBTOR'S DECLARATIONS IN SUPPORT OF CONFIRMATION OF THE DEBTOR'S MODIFIED FOURTH AMENDED PLAN OF REORGANIZATION** Judge: Hon. William J. Lafferty

The Official Committee of Unsecured Creditors (the "**Committee**") of the Roman Catholic Bishop of Oakland (the "**Debtor**") hereby files this notice (this "**Notice**") of filing the Committee's objections to the Debtor's declarations filed in support of the *Debtor's Modified Fourth Amended Plan of Reorganization Dated March 27, 2026* [Dkt. No. 2758] in this chapter 11 bankruptcy case. The following documents are attached to this Notice:

- A true and correct copy of the Committee's objections to the Declaration of Attila J. Bardos is attached hereto as **Exhibit A**.
- A true and correct copy of the Committee's objections to the Declaration of Dr. Kurt Martens, J.C.D. is attached hereto as **Exhibit B**.
- A true and correct copy of the Committee's objections to the Declaration of Denise Martin, Ph.D is attached hereto as **Exhibit C**.
- A true and correct copy of the Committee's objections to the Declaration of Ronald Gies is attached hereto as **Exhibit D**.
- A true and correct copy of the Committee's objections to the Declaration of Joshua Hogan is attached hereto as **Exhibit E**.
- A true and correct copy of the Committee's objections to the Declaration of Charles M. Moore is attached hereto as **Exhibit F**.
- A true and correct copy of the Committee's objections to the Declaration of Andrew Currier is attached hereto as **Exhibit G**.

[*Signature on Following Page*]

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP

Dated: June 11, 2026

By: */s/ Michael Kaplan*
Jeffrey D. Prol
Michael A. Kaplan
Brent Weisenberg
Colleen M. Restel

– and –

Tobias S. Keller
Jane Kim
Gabrielle L. Albert

Counsel for the Official Committee of Unsecured Creditors

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Exhibit A

The Official Committee of Unsecured Creditors, through its undersigned counsel, objects to the *Declaration of Attila J. Bardos in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Dkt. No. 3103-5] as follows:

Paragraph	Objection
1	None.
2	None.
3	None.
4	None.
5	None.
6	None.
7	None.
8	Lacks personal knowledge. Fed. R. Evid. 602.
9	None.
10	None.

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP

Dated: June 11, 2026

By: */s/ Michael Kaplan*
Jeffrey D. Prol
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Colleen M. Restel

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Tobias S. Keller
Jane Kim
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Counsel for the Official Committee of Unsecured Creditors

Exhibit B

The Official Committee of Unsecured Creditors, through its undersigned counsel, objects to the *Declaration of Dr. Kurt Martens, J.C.D. in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Dkt. No. 3103-3] as follows[1]:

Paragraph	Objection
1	None.
2	None.
3	None.
4	None.
5	None.
6	None.
7	None.
8	None.
9	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
10	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
11	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
12	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
13	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
14	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.

[1] In addition to the objections stated herein, the Committee also expressly incorporates the arguments raised in *The Official Committee of Unsecured Creditors' Motion in Limine to Exclude Dr. Kurt Martens' Testimony* [Dkt. No. 3057].

Paragraph	Objection
15	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
16	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
17	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
18	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
19	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
20	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
21	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
22	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
23	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
24	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
25	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
26	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.

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Paragraph	Objection
27	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
28	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
29	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
30	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702. Legal conclusion. Fed. R. Evid. 701.
31	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
32	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
33	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
34	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702. Legal conclusion. Fed. R. Evid. 701.

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP

Dated: June 11, 2026

By: */s/ Michael Kaplan*
Jeffrey D. Prol
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Tobias S. Keller
Jane Kim
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Counsel for the Official Committee of Unsecured Creditors

Exhibit C

The Official Committee of Unsecured Creditors, through its undersigned counsel, objects to the *Declaration of Denise Martin, Ph.D in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Dkt. No. 3103-2] as follows:

Paragraph	Objection
1	None.
2	None.
3	None.
4	None.
5	None.
6	None.
7	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
8	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
9	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
10	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
11	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
12	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
13 (Conclusion 1 & Figures 1 & 2)	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
13 (Conclusion 2 & Figures 4 & 5)	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.

Paragraph	Objection
13 (Conclusion 3 & Figures 6 & 7)	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
13 (Conclusion 4)	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
14	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
15	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702. Speculation. Fed. R. Evid. 602.
16	None.
17	None.
18	None.
19	None.
20	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
21	None.
22	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
23 (Including Table 4)	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
24 (Including Figures 1 & 2)	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
25	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
26 (Including Figure 3)	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.

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Paragraph	Objection
27	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
28	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.
29	Relevance. Fed. R. Evid. 401, 402. Testimony not helpful. Fed. R. Evid. 702.

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP

Dated: June 11, 2026

By: */s/ Michael Kaplan*
Jeffrey D. Prol
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Exhibit D

The Official Committee of Unsecured Creditors, through its undersigned counsel, objects to the *Declaration of Ronald Gies in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Dkt. No. 3103-6] as follows:

Paragraph	Objection
1	None.
2	None.
3	None.
4	None.
5	None.
6	None.
7	None.
8	None.
9	None.
10	None.
11	None.
12	Legal conclusion. Fed. R. Evid. 701.
13	None.
14	None.
15	None.
16	None.
17	None.
18	None.
19	None.
20	None.

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP

Dated: June 11, 2026

By: */s/ Michael Kaplan*
Jeffrey D. Prol
Michael A. Kaplan
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Exhibit E

The Official Committee of Unsecured Creditors, through its undersigned counsel, objects to the *Declaration of Joshua Hogan, the Unknown Abuse Claims Representative in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Dkt. No. 3103-4] as follows:

Paragraph	Objection
1	None.
2	None.
3	None.
4	None.
5	None.
6	Relevance. Fed. R. Evid. 401, 402.
7	None.
8	None.
9	None.
10	None.
11	None.
12	None.
13	None.
14	None.
15	None.
16	None.

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP

Dated: June 11, 2026

By: */s/ Michael Kaplan*
Jeffrey D. Prol
Michael A. Kaplan
Brent Weisenberg
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Exhibit F

The Official Committee of Unsecured Creditors, through its undersigned counsel, objects to the *Declaration of Charles M. Moore in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Dkt. No. 3103-1] as follows:

Paragraph	Objection
1	None.
2	None.
3	None.
4	None.
5	None.
6	None.
7	None.
8	None.
9	None.
10	None.
11	None.
12	None.
13	None.
14	None.
15	None.
16	None.
17	None.
18	None.
19	None.

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP

Dated: June 11, 2026

By: */s/ Michael Kaplan*
Jeffrey D. Prol
Michael A. Kaplan
Brent Weisenberg
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Exhibit G

The Official Committee of Unsecured Creditors, through its undersigned counsel, objects to the *Declaration of Andrew Currier in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Dkt. No. 3103-7] as follows:

Paragraph	Objection
1	None.
2	None.
3	None.
4	None.
5	None.
6	None.
7	None.
8	None.
9	None.
10	None.
11	None.
12	None.
13	Legal conclusion. Fed. R. Evid. 701.
14	None.
15	None.
16	None.
17	None.
18	None.
19	None.
20	None.
21	None.
22	None.

Paragraph	Objection
23	None.
24	None.
25	None.

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP

Dated: June 11, 2026

By: */s/ Michael Kaplan*
Jeffrey D. Prol
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