**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<br><br>**AMENDED DECLARATION OF ANDRES A. ESTRADA WITH RESPECT TO SOLICITATION AND THE TABULATION OF CLASS 3 VOTES ON THE DEBTOR'S THIRD AMENDED PLAN OF REORGANIZATION**<br><br>Judge: Hon. William J. Lafferty |

I, Andres A. Estrada, hereby declare under the penalty of perjury:

1. I am a Managing Director of Corporate Restructuring Services employed by Kurtzman Carson Consultants LLC dba Verita Global ("Verita"), whose main business address is 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, California 90245.

2. I submit this declaration (the "Declaration") with respect to the solicitation of votes and the tabulation of Class 3 ballots submitted in connection with the *Debtor's Third Amended Plan of Reorganization Dated March 17, 2025* (Docket No. 1830) (the "Third Amended Plan"), as modified by that certain *Modified Fourth Amended Plan Dated March 27, 2026* (Docket No. 2758) (the "Plan").[1] Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision, and my review of relevant documents. I am authorized to submit this Declaration on behalf of Verita. If I were called to testify, I could and would testify competently as to the facts set forth herein.

3. The Bankruptcy Court authorized Verita's retention (a) as claims and noticing agent to the Debtor on May 11, 2023 pursuant to the *Order (I) Authorizing and Approving the Appointment of Kurtzman*

[1] Capitalized terms used but not defined herein shall have mea

*Carson Consultants LLC as Claims and Noticing Agent, and (II) Granting Related Relief* (Docket No. 40), and (b) as administrative advisor to the Debtor on June 15, 2023 pursuant to the *Order (I) Authorizing and Approving the Appointment of Kurtzman Carson Consultants, LLC as Administrative Advisor, and (II) Granting Related Relief* (Docket No. 146) (together, the "Retention Orders"). The Retention Orders authorized Verita to assist the Debtor with, among other things, the service of solicitation materials and tabulation of votes cast to accept or reject a chapter 11 plan of reorganization. Verita and its employees have considerable experience in soliciting and tabulating votes to accept or reject chapter 11 plans.

**SERVICE AND TRANSMITTAL OF SOLICITATION PACKAGES AND THE TABULATION PROCESS**

4. On April 4, 2025, the Bankruptcy Court entered the *Order (I) Approving Third Amended Disclosure Statement; (II) Establishing Procedures for Plan Solicitation, Notice, and Balloting* (Docket No. 1877) (the "Original Disclosure Statement Order"), establishing procedures to solicit votes from and tabulate Ballots submitted by Holders of Claims entitled to vote on the Third Amended Plan. I supervised the solicitation and tabulation performed by Verita's employees. The Original Disclosure Statement Order was supplemented by that certain *Order (I) Approving the Debtor's Disclosure Statement and (II) Establishing Procedures for Solicitation, Notice, and Balloting for the Plan* (Docket No. 2910) entered on May 8, 2026 (the "Supplemental Disclosure Statement Order" and together with the Original Disclosure Statement Order, the "Disclosure Statement Order").

5. In accordance with the Disclosure Statement Order, Verita received, reviewed, determined the validity of, and tabulated the Ballots submitted to vote on the Third Amended Plan, including Ballots submitted in connection with Class 3 under the Third Amended Plan. Each Ballot submitted to Verita was date-stamped, scanned, assigned a Ballot number, entered into Verita's voting database, and processed. Importantly, the Supplemental Disclosure Statement Order did not require resolicitation of votes in Class 3.

6. Per the Disclosure Statement Order, to be included in the tabulation results as valid, a Ballot must have been (a) properly completed pursuant to the Disclosure Statement Order, (b) executed by the

relevant holder entitled to vote on the Plan (or such holder's representative), (c) returned to Verita via an approved method of delivery set forth in the Disclosure Statement Order, and (d) received by Voting Deadline. Every validly cast Ballot was considered in the tabulation.

**7.** I am filing this amended declaration to take into account the *Order Approving Resolution of the Official Committee of Unsecured Creditors' Motion to Designate Certain Class 1, Class 3, and Class 6 Votes [Dkt. No. 3001]* entered at Docket No. 3214 (the "Designation Order"). Specifically, following certain modifications to the vote tabulation for Class 3 pursuant to the Designation Order, the final tabulation of Class 3 votes cast by timely and properly completed Ballots received by Verita is attached hereto as **Exhibit A**. The detailed Ballot report for the Class 3 votes is attached hereto as **Exhibit A-1**.

## CONCLUSION

To the best of my knowledge, information and belief, the foregoing information concerning the distribution, submission, and tabulation of Ballots in connection with the Plan is true.

Dated: June 24, 2026

*/s/ Andres A. Estrada*
Andres A. Estrada
Verita
222 N Pacific Coast Highway, 3rd Floor
El Segundo, CA 90245
Tel 310.823.9000

**Exhibit A**
**Amended Class 3 Ballot Tabulation Summary**

| Class Name | Class Description | Not Tabulated | Members Voted | Members Accepted | Members Rejected | % Members Accepted | % Members Rejected | Total $ Voted | $ Accepted | $ Rejected | % $ Accepted | % $ Rejected |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 3 | General Unsecured Claims | 14 | 16 | 12 | 4 | 75.00 | 25.00 | $70,962.02 | $55,778.18 | $15,183.84 | 78.60 | 21.40 |


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**Exhibit A-1**
**Class 3 Ballot Detail**
**General Unsecured Claims**

| Creditor Name | Date Filed | Ballot No. | Voting Amount | Vote |
|---|---|---|---|---|
| CITY OF OAKLAND | 05/20/2025 | 187 | $11,655.46 | Accept |
| CITY OF OAKLAND | 05/20/2025 | 188 | $13,531.12 | Accept |
| CONVENTUAL FRANCISCANS | 05/21/2025 | 190 | $6,220.69 | Accept |
| ELIZABETH OTIS | 05/07/2025 | 29 | $5,548.96 | Accept |
| FDLC | 04/23/2025 | 2 | $819.00 | Accept |
| FRANK RYKEN | 04/23/2025 | 3 | $3,000.00 | Reject |
| HOLLIS MARIE PIERCE-JENKINS | 05/14/2025 | 137 | $10,042.80 | Reject |
| JOSEPH NUFABLE | 05/22/2025 | 204 | $154.38 | Accept |
| LCC ENGINEERING & SURVEYING, INC. | 05/14/2025 | 140 | $1,518.00 | Accept |
| LUMEN CHRISTI ACADEMIES | 05/29/2025 | 363 | $1,700.00 | Accept |
| MVP SPORTS | 04/25/2025 | 1 | $2,001.04 | Reject |
| REV. JERRY BROWN | 04/23/2025 | 5 | $130.00 | Accept |
| REV. TIMOTHY K. JOHNSON | 04/23/2025 | 4 | $140.00 | Reject |
| REV. TIMOTHY T. FERGUSON | 05/13/2025 | 118 | $500.00 | Accept |
| SALESIAN COLLEGE PREPARATORY | 05/12/2025 | 115 | $3,000.00 | Accept |
| US CONFERENCE OF CATHOLIC BISHOPS | 05/12/2025 | 116 | $11,000.57 | Accept |


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