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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.

Case No.: 23-40523 WJL

Chapter 11

PACIFIC INSURERS' JOINDER TO LONDON MARKET INSURERS' POSTTRIAL BRIEF

Insurance Company of North America, Westchester Fire Insurance Company, Pacific Indemnity Company, and Pacific Employers Insurance Company (collectively, the "Pacific Insurers"), by and through their undersigned counsel, hereby join and incorporate by reference the arguments set forth in the post-trial objections of Certain Underwriters at Lloyd's, London and certain London Market Insurers[1] (collectively, "London Market Insurers" or "LMI") concerning

[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

limits on the objection to claims, the delegations of claims allowance to the trustee, and the payment of invalid claims at ECF No. 3414 (bearing headings **"***The Plan Improperly Limits the Rights of Parties in Interest to Object to Claims", "The Plan Cannot Delegate Claims Allowance*" and "*Disallowance to the Survivors' Trustee and the Plan Improperly Proposes to Pay Invalid Claims"*).

On May 13, 2026, the Pacific Insurers filed their objections[2] to the *Debtor's Modified Fourth Amended Plan of Reorganization Dated March 27, 2026* ("Plan").[3] The Pacific Insurers continue to assert all their Objections, whether addressed herein or in the post-trial brief filed together with Westport, CNA, and Travelers.

Exemplars of policies issued by the Pacific Insurers were admitted into evidence as Certain Insurers' Exhibits Nos. CI 19 and CI 20, conferring on the Debtor the contractual obligation to cooperate in the investigation, defense and settlement of claims. Exemplars of letters accepting the defense under a reservation of rights were admitted into evidence as CI 129, CI 130, CI 131, CI 132, and CI 133. The Pacific Insurers' contract rights are implicated by the Plan, and they have standing to be heard for the reasons articulated by LMI in its post-trial brief.

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.).

[2] ECF. No. 2951.

[3] ECF No. 2758.

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DATED: August 7, 2026

By: /s/ *Tancred Schiavoni*
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