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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 Chapter 11 **APPLICATION FOR ORDER SHORTENING TIME FOR NOTICE OF HEARING ON DEBTOR'S EIGHTH MOTION TO EXTEND DEADLINE TO ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY PURSUANT TO SECTION 365(d)(4) OF THE BANKRUPTCY CODE** [No Hearing Required]

I.
INTRODUCTION

The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or the "Bankruptcy Case"), hereby files this application (the "Application") for entry of an order pursuant to Bankruptcy Lobal Rule ("B.L.R.") 9006-1 shortening time for notice of a hearing on the *Debtor's Eighth Motion to Extend Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code*, filed concurrently herewith (the "Motion").[1]

The Debtor seeks a hearing on the Motion no later than October 1, 2026, and submits that it would be most efficient to set the Motion for hearing on the Court's regular law and motion calendar at 10:30 a.m. on September 30, 2026. The Debtor's proposed order shortening notice is attached hereto as **Exhibit A**. The Debtor has confirmed that the Committee does not oppose this request to shorten time and additionally does not oppose the relief requested in the Motion.

In support of this Application, the Debtor submits the concurrently filed declaration of Shane J. Moses, counsel for the Debtor, and respectfully represents as follows:

II.
BACKGROUND

A. General Background

On May 8, 2023 (the "Petition Date"), the Debtor filed a voluntary petition for chapter 11 bankruptcy relief under the Bankruptcy Code. The Debtor continues to operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108 of Title 11 of the United States Code (the "Bankruptcy Code"). On May 23, 2023, the Office of the United States Trustee for Region 17 (the "US Trustee") appointed the Committee in this Chapter 11 Case.

[1] Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

B. Relief Requested in the Motion

By the Motion, the Debtor requests an order further extending the time for the Debtor to assume or reject the agreement the "Cathedral Lease") for the Debtor's use of facilities and grounds in Oakland owned by the Catholic Cathedral Corporation of the East Bay ("CCCEB"), which includes the Cathedral of Christ the Light and the Debtor's Chancery offices.

The relief requested in the Motion is substantively the same as granted pursuant to the Debtor's seven prior motions to extend the Lease Assumption Deadline.

III.

REQUEST FOR ORDER SHORTENING TIME

Under Federal Rule of Bankruptcy Procedure 9006(c) and L.B.R. 9006-1(c) the Court may shorten time for notice upon a showing of good cause. For the reasons set forth herein, there is good cause to shorten notice as to a hearing on the Motion.

The Debtor requests that the Court set the Motion for hearing on September 30, 2026, at 10:30 a.m., concurrent with the scheduled status conference at the same date and time. The Debtor further requests that the Court require than any opposition to the Motion be in writing and filed with the Court prior to the hearing or made orally at the hearing. Because the Committee has indicated it will not oppose the relief requested in the motion, the Debtor does not anticipate any opposition.

In compliance with the requirements of B.L.R. 9006-1(c), the Debtor states as follows:

The reason for the requested shortened time. The Motion relates to the Cathedral Lease for the Debtor's use of facilities and grounds in Oakland owned by CCCEB, which includes the Cathedral of Christ the Light and the Debtor's Chancery offices. Rejection of the Cathedral Lease would have a substantial negative effect on the Debtor and its reorganization, as it provides both the most visible, landmark place of worship in the Diocese, and the central chancery offices of the Debtor. As set forth in the Motion, the Debtor believes that the Cathedral Lease should be addressed through any confirmed plan of reorganization, as proposed in its currently pending Plan.

The Debtor's current deadline to assume or reject the Cathedral Lease expires on October 1, 2026, A hearing on shortened time is therefore necessary to keep the status quo pending resolution of the Debtor's Plan.

Previous time modifications relating to the subject matter of the request. No previous requests have been made to shorten time with respect to the Motion.

The effect of the request for shortened time. There should be no adverse impact on the schedule for the case or proceeding if the Court grants the Application. The lessor is not negatively affected, and no other party is substantively affected.

Efforts to speak with responding parties. The Debtor's counsel has communicated with the counsel for the Committee regarding the request herein for a hearing on shortened notice. Counsel for the Committee has confirmed the Committee does not oppose setting the hearing on shortened notice. Counsel for the Committee has also indicated the Committee does not oppose the relief requested in the Motion, provided it is without prejudice to the rights, claims, causes of action and/ or defenses the Committee may have regarding, arising out of or related to the Cathedral Lease.

Service of notice of hearing. The Debtor requests a determination that notice of the hearing on the Motion shall be sufficient provided that, not later than one business day following entry of an order shortening notice, the Debtor serves notice of the hearing on the Motion, the Motion, and all supporting papers on the Core Service List pursuant to the Court's *Final Order Approving Special Noticing and Confidentiality Procedures* [Docket No. 292].

IV.
CONCLUSION

WHEREFORE, the Debtor requests that the Court enter an order in the form attached hereto granting the relief requested herein to shorten notice for the Motion and allow for a notice of hearing.

DATED: September 25, 2025

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/s/ Shane J. Moses
SHANE J. MOSES

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EXHIBIT A

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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 **ORDER SHORTENING TIME FOR NOTICE OF HEARING ON DEBTOR'S EIGHTH MOTION TO EXTEND DEADLINE TO ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY PURSUANT TO SECTION 365(d)(4) OF THE BANKRUPTCY CODE**

The Court, having considered the *Application for Order Shortening Time for Notice of Hearing on Debtor's Eighth Motion to Extend Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code* [Docket No. ____] filed on September 25, 2026 (the "Application"), by the Roman Catholic Bishop of Oakland, a California corporation sole,

and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or the "Bankruptcy Case") and good cause appearing,

IT IS HEREBY ORDERED THAT:

1. The Application is granted.

2. The *Debtor's Eighth Motion to Extend Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code* (the "Motion") may be noticed for hearing on September 30, 2026, at 10:30 a.m. (the "Hearing").

3. Opposition to the Motion, if any, must be made in writing and filed with the Court prior to the Hearing, or made be made orally at the Hearing.

4. Time for notice of the Hearing is shortened to the extent that notice of the Hearing on the Motion and the deadline for opposition to the Motion shall be sufficient provided that, not later than one business day following entry of this Order, the Debtor serves notice of the hearing on the Motion, the Motion, and all supporting papers on the Core Service List pursuant to the Court's *Final Order Approving Special Noticing and Confidentiality Procedures* [Docket No. 292], and on the affected lessor.

5. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

END OF ORDER

COURT SERVICE LIST

All ECF Recipients.