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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 **DECLARATION OF SHANE J. MOSES IN SUPPORT OF 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, Shane J. Moses, hereby declare as follows:

1. I am an attorney admitted to practice in the States of California and New York, and before this Bankruptcy Court. I am of counsel with the law firm of Foley & Lardner LLP ("Foley"), and am one of the attorneys at Foley responsible for representation of the Roman Catholic Bishop of Oakland ("the Debtor") in this Bankruptcy Case. I make this Declaration in support of the concurrently filed *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 (the "Application").

2. By the Application, the Debtor requests an order shortening time for notice on its *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").

3. The Motion relates to the agreement 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 "Cathedral Lease"). I am informed and believe that 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.

4. 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.

5. No previous requests have been made to shorten time with respect to the Motion.

6. 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.

7. Debtor's counsel has communicated with the counsel for the Committee regarding the request for a hearing on shortened time. Specifically, on Friday, September 25, 2026, I spoke with Attorney Brent Weisenberg, counsel for the Committee. Mr. Weisenberg confirmed that the Committee does not oppose the shortening of notice as requested in the Application. Mr. Weisenberg also confirmed that the Committee does not oppose the relief sought in the Motion, provided it is on the same terms as the previous extensions.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed on September 25, 2026, in Oakland California.

/s/ Shane J. Moses
Shane J. Moses