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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

Hon. William J. Lafferty

Chapter 11

RESPONSE TO NOTICE OF FILING OF REDLINES REGARDING INSURER PROPOSED REVISIONS TO DEBTOR'S MODIFIED FOURTH AMENDED PLAN OF REORGANIZATION

[No Hearing Requested]

Certain Underwriters at Lloyd's, London and Certain London Market Companies ("London Market Insurers" or "LMI")[1] respectfully submit this response to the *Notice of Filing of Redlines Regarding Insurer Proposed Revisions to Debtor's Modified Fourth Amended Plan of Reorganization* [Dkt No. 3526] ("Notice of Redlines") filed by the Roman Catholic Bishop of Oakland ("Debtor").

On July 22, 2026, LMI, on behalf of LMI, Westport Insurance Corporation f/k/a Employers Reinsurance Corporation; Pacific Indemnity Company ("Westport"), Pacific Employers Insurance Company, Insurance Company of North America, and Westchester Fire Insurance Company ("Pacific"); and Travelers Casualty & Surety Company f/k/a Aetna Casualty & Surety Company ("Travelers") (collectively, "Certain Insurers") sent the Debtor a red-lined draft of revisions to the Modified Fourth Amended Plan of Reorganization ("Plan"), which would make the Plan acceptable to Certain Insurers. This matter was discussed several times at the confirmation hearing. The Certain Insurers' proposed revisions were reasonable and tailored to addressed their concerns if accepted in whole.

On September 15, 2026, after more than seven weeks and on the evening before closing arguments, the Debtor finally responded to the Certain Insurers' proposed revisions. On September 28, 2026, the Debtor filed its Notice of Redlines, setting forth the positions of the Debtor and Official Committee of Unsecured Creditors ("Committee") to the Certain Insurers' proposed revisions. Even though the Certain Insurers' proposed revisions were limited in nature, the Debtor and Committee have rejected nearly all proposed changes. Accordingly, LMI do not withdraw any of their objections to the Debtor's Plan.

[1] LMI are Certain Underwriters at Lloyd's, London, subscribing severally and not jointly to Slip Nos. CU 1001 and K 66034 issued to the Roman Catholic Bishop of San Francisco, and Nos. K 78138 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 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.).

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Dated: October 1, 2026

By: */s/ Russell W. Roten*

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