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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 PURSUANT TO B.L.R. 9013-1(C) ENLARGING PAGE LIMIT FOR DEBTOR'S MOTION TO AMEND FINDINGS AND/OR FOR RECONSIDERATION OF SPECIFIC ISSUES** [No Hearing Requested]

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 submits this application (the "Application") for an order, pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the Northern District of California (the "Bankruptcy Local Rules" or "B.L.R."), enlarging the page limits for the Debtor's memorandum of points and authorities (the "Memorandum") in support of its concurrently filed *Debtor's Motion to Amend Findings and/or For Reconsideration of Specific Issues* (the "Motion").

I. RELIEF REQUESTED

Bankruptcy Local Rule 9013-1(c) limits the length of legal memoranda to 25 pages of text unless the Court expressly orders otherwise. Therefore, the Debtor respectfully requests an enlargement of the page limit permitting a Memorandum in support of its Motion not to exceed 32 pages.

II. JURISDICTION AND VENUE

The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

The statutory bases for the relief requested in this Application are 11 U.S.C. § 105(a) and Bankruptcy Local Rule 9013-1(c).

III. 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 the Bankruptcy Code. No trustee has been appointed in this Chapter 11 Case.

On May 23, 2023, the U.S. Trustee appointed the Official Committee of Unsecured Creditors (the "Committee").

The Debtor filed the *Debtor's Modified Fourth Amended Plan of Reorganization Dated March 27, 2026* (the "Plan") on March 29, 2026 [Docket No. 2758]. The Court held a trial commencing on June 15, 2026, on confirmation of the Plan (the "Confirmation Hearing"). On October 2, 2026, the Court issued its *Memorandum Decision After Hearing on Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Docket No. 3548] (the "Memorandum Decision") issued by the Court on October 2, 2026, as amended to correct typographical and formatting issues on October 15, 2026, at Docket No. 3567 (the "Amended Decision").

The Debtor is filing its Motion seeking specific, targeted, corrections of the record and amendment of finding reflected in the Memorandum Decision. The debtor is not by its Motion seeking to reargue confirmation of its current Plan or to change the result, but is filing the motions because it below that it is

critical to address the issues raised in the Memorandum in order to clarify the path forward and accurately reflect the evidence presented and the findings of the Court.

IV. GROUNDS FOR EXTENDING PAGE LIMITS FOR BRIEFING

Under B.L.R. 9013-1(c), the Court may enter an order permitting the filing of a brief or memorandum in excess of 25 pages. The Debtor has worked diligently to prepare its Memorandum in support of the Motion but given the issues that need to be addressed, and the level of detail necessary to fully brief the basis for its requested relief as to each issue, it is simply not possible for the Debtor to adequately address all relevant information within the 25-page limit set by B.L.R. 9013-1(c).

As the Court is well aware, the Memorandum Decision exceeds 100 pages in length, and encapsulates evidence and argument presented over eight days of trial with fifteen witnesses and many hundreds of pages of briefing. While the Debtor has limited the motion to five specific, targeted issues, in seeking relief regarding those issues, it is essential that the Debtor thoroughly brief the context and basis for seeking correction by the Court.

The Debtor has made a concerted effort to limit the total length of its Memorandum to comport with the Bankruptcy Local Rules. Notwithstanding these efforts, the Debtor has determined that it is impossible for it to fully and adequately address the legal and factual issues relevant to the relief it seeks within the 25-page limit required under B.L.R. 9013-1(c).

Consequently, granting the relief requested in this Application – relaxing the current page constraint imposed by the Bankruptcy Local Rules on the Confirmation Brief – will allow the Debtor to present a thorough and comprehensive analysis of all issues relevant to the Motion. No party in interest will be prejudiced by the limited additional pages requested, particularly given that any responding party may seek comparable relief. Indeed, in the interest of efficiency, the Debtor hereby requests that the Court grant the same extended page limit for any response filed by any other party.

As such, the Debtor requests the Court enlarge the page limit for a Memorandum in support of its Motion that is up to 32 pages in length to ensure that all relevant legal and factual matters are fully addressed for the Court's consideration, and requests that the Court grant the same relief as to any responsive memoranda.

V. CONCLUSION

WHEREFORE, the Debtors requests that the Court enter an order substantially in the form attached as **Exhibit A** granting the relief requested herein, and for such other and further relief as is just and proper.

DATED: October 16, 2026

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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 **[PROPOSED] ORDER PURSUANT TO B.L.R. 9013-1(C) ENLARGING PAGE LIMIT FOR DEBTOR'S MOTION TO AMEND FINDINGS AND/OR FOR RECONSIDERATION OF SPECIFIC ISSUES**

The Court, having considered the *Application for Order Pursuant to B.L.R. 9013-1(C) Enlarging Page Limit for Debtor's Motion to Amend Findings and/or For Reconsideration of Specific Issues* (the "Application"), requesting entry of an order pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the Northern District of California enlarging the page limit for the memorandum of points and authorities (the "Memorandum") in support of the *Debtor's Motion to Amend Findings and/or For Reconsideration of Specific Issues* (the "Motion") filed 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"); after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as provided herein.

2. The Court hereby enlarges the 25-page limit provided in Local Bankruptcy Rule 9013-1(c) for the Debtor's Memorandum in Support of its Motion, and for any memoranda in response to the Motion.

3. The Debtor's Memorandum and any responsive memoranda to the Motion shall not exceed 32 pages of text (exclusive of captions, tables, and signatures blocks).

4. The Court shall retain jurisdiction to resolve any disputes or controversies arising from this Order.

END OF ORDER

COURT SERVICE LIST

All ECF Recipients.

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