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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

LIMITED RESPONSE TO DEBTOR'S APPLICATION FOR ORDER APPOINTING HON. DANIEL BUCKLEY (RET.) AS MEDIATOR

Certain Underwriters at Lloyd's, London and Certain London Market Companies ("London Market Insurers" or "LMI")[1] respectfully submit this Limited Response to the Application for Order Appointing Hon. Daniel Buckley (Ret.) as mediator, filed by the Roman Catholic Bishop of Oakland ("Debtor").

To ensure that mediation has the best prospects for success, the Debtor and Committee should involve insurers in discussions about whether new mediators should be added and in the selection of those mediators. Further, the Debtor and Committee should include insurers in future mediation sessions or any discussions (formal or informal) aimed at achieving a global settlement.

Dated: November 13, 2026

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[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 Archbishop 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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