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*Counsel to the Official Committee of Unsecured  
Creditors***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

**STIPULATION AND AGREEMENT  
FOR ORDER EXTENDING TIME TO  
BRING AVOIDANCE ACTIONS**

This stipulation and agreement for order (this “**Stipulation and Agreement for Order**”) is entered into by the Official Committee of Unsecured Creditors (the “**Committee**”) and The Roman Catholic Bishop of Oakland, as debtor in the above captioned case (the “**Debtor**”). The Committee and the Debtor are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

1           **WHEREAS**, on May 8, 2023 (the “**Petition Date**”), the Debtor filed a voluntary petition  
2 for relief under Chapter 11 of the United States Bankruptcy code (the “**Bankruptcy Code**”)  
3 commence the above captioned chapter 11 case (the “**Chapter 11 Case**”).

4           **WHEREAS**, absent extension, the deadline to commence an action or proceeding under  
5 section 544, 545, 547, 548, or 553 of the Bankruptcy Code (collectively “**Avoidance Actions**”)  
6 is May 8, 2025 pursuant to Section 546(a) of the Bankruptcy Code.

7           **WHEREAS**, the Parties have agreed to extend the deadline for parties with standing or  
8 who receive standing by order of the Court to bring Avoidance Actions in this Chapter 11 Case  
9 as set forth herein, subject to further possible extension.

10           **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
11 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT IS HEREBY**  
12 **STIPULATED AND AGREED, BY AND AMONG THE PARTIES, THROUGH THE**  
13 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
14 **THAT:**

15           1.       The time for any party with standing, or any party who receives standing by order  
16 of the Court, to bring Avoidance Actions in this Chapter 11 Case is extended through the earliest  
17 of (i) November 8, 2025, (ii) the date that is 60 days after the effective date of a confirmed plan  
18 of reorganization in this Chapter 11 Case, or (iii) the date on which an order dismissing this  
19 Chapter 11 Case becomes final and non-appealable.

20           2.       The Parties reserve the right to request a further extension of the deadline to bring  
21 Avoidance Actions in connection with this Chapter 11 Case.

1 Dated: April 4, 2025

**FOLEY & LARDNER LLP**

2  
3 By: /s/ Ann Marie Uetz  
4 Ann Marie Uetz

5 *Attorneys for the Debtor and Debtor In*  
6 *Possession*

7 Dated: April 4, 2025

**KELLER BENVENUTTI KIM LLP**  
**LOWENSTEIN SANDLER LLP**

9 By: /s/ Gabrielle L. Albert  
10 Gabrielle L. Albert

11 *Counsel for the Official Committee of*  
12 *Unsecured Creditors*

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**EXHIBIT A**

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12 *Counsel for the Official Committee of Unsecured*  
13 *Creditors*

14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **OAKLAND DIVISION**

17 *In re:*

18 THE ROMAN CATHOLIC BISHOP OF  
19 OAKLAND, a California corporation sole,

20 Debtor.

Case No. 23-40523 WJL

Chapter 11

**[PROPOSED] ORDER EXTENDING  
TIME TO BRING AVOIDANCE  
ACTIONS**

[Re: Dkt. No. \_\_\_\_]

21  
22 The Court having considered the *Stipulation and Agreement for Order Extending Time to*  
23 *Bring Avoidance Actions* [Dkt. No. \_\_\_\_] (the “**Stipulation**”)<sup>1</sup>, filed on April \_\_, 2025; and, pursuant  
24 to such stipulation and agreement of the Parties, and good cause appearing,

25 **IT IS HEREBY ORDERED:**

- 26 1. The time for any party with standing, or any party who receives standing by order  
27

28 <sup>1</sup> Capitalized terms not otherwise defined shall have the meaning ascribed to them in the Stipulation.

1 of the Court, to bring Avoidance Actions in this Chapter 11 Case is extended through the earliest  
2 of (i) November 8, 2025, (ii) the date that is 60 days after the effective date of a confirmed plan of  
3 reorganization in this Chapter 11 Case, or (iii) the date on which an order dismissing this Chapter  
4 11 Case becomes final and non-appealable.

5 2. The Parties reserve the right to request a further extension of the deadline to bring  
6 Avoidance Actions in connection with this Chapter 11 Case.

7  
8 \*END OF ORDER\*

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**COURT SERVICE LIST**

All ECF Parties