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7 8 9 10 11 12	Facsimile: (973) 397-2400 KELLER BENVENUTTI KIM LLP TOBIAS S. KELLER (Cal. Bar No. 151445) tkeller@kbkllp.com JANE KIM (Cal. Bar No. 298192) jkim@kbkllp.com GABRIELLE L. ALBERT (Cal. Bar No. 190895) galbert@kbkllp.com 650 California Street, Suite 1900 San Francisco, California 94108 Telephone: (415) 496-6723 Facsimile: (650) 636-9251			
13 14	Counsel for the Official Committee of Unsecured Creditors			
15	UNITED STATES BANKRUPTCY COURT			
16	NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION			
17				
18		Case No. 23-40523 WJL		
19	In re:	Chapter 11		
20	THE ROMAN CATHOLIC BISHOP OF	DECLARATION OF RANDI ROSEN IN		
21	OAKLAND, a California corporation sole,	SUPPORT OF THE APPLICATION FOR ORDER AUTHORIZING THE		
22	Debtor.	RETENTION OF STOUT RISIUS ROSS, LLC AS REAL ESTATE CONSULTANT		
23		AND EXPERT WITNESS		
24		• 		
25	I, Randi Rosen, hereby declare pursuant to 28 U.S.C. § 1746:			
26	I am a Managing Director at Stout Risius Ross, LLC ("Stout"). My business address is			
27	3390 Carmel Mountain Road, Suite 150, San Diego, California 92121. I am authorized to make			
28	this Declaration on behalf of Stout.			
Case:	23-40523 Doc# 1888 Filed: 04/09/25 En 5	tered: 04/(234052325040900000000000		

I submit this Declaration pursuant to Rules 2014(a) and 2016(b) of the Federal Rules of
 Bankruptcy Procedure in support of the *Application for Order Authorizing the Retention of Stout Risius Ross, LLC as Real Estate Consultant and Expert Witness* (the "<u>Application</u>").¹

The facts set forth in this declaration are personally known to me, and, if called as a witness,
I could and would competently testify thereto. To the extent any information disclosed herein
requires subsequent amendment and/or modification, Stout will use reasonable efforts to file a
supplemental declaration reflecting such amended and/or modified information.

8

I.

THE FIRM'S QUALIFICATIONS

10 Stout's professional(s) who may provide the Services as described in the Application have 11 decades of relevant experience and are often retained in connection with real estate valuation in 12 substantially similar circumstances. For example, before joining Stout, I was retained as an expert 13 consultant by the Official Committee of Unsecured Creditors in the Roman Catholic Diocese of 14 San Diego, California bankruptcy proceeding, Case No. 07-00939, in which I appraised certain of the debtor's assets, comprised of schools, vacant land, residential property, and churches.² The 15 San Diego Diocese debtor had claimed that these real estate assets held little value and could not 16 17 be rezoned, but this work uncovered significant value to improve creditors' recoveries.

18 Stout has also been retained by the Official Committee of Unsecured Creditors in the
19 Roman Catholic Diocese of Buffalo, New York bankruptcy proceeding, Case No. 20-10322, in
20 which Stout is evaluating the Diocese of Buffalo's portfolio of real estate holdings, focusing on
21 the valuation of five schools, a seminary, and the primary administrative offices for the Diocese.
22 Other analogous projects include Stout's retention by The Law Offices of Richard Corbi

PLLC on behalf of Legalist DIP SPV, II, LP in the Paradox Enterprises, LLC bankruptcy case,
Case No. 24-10826, where Stout provided real estate valuation services for 72 income producing
properties on behalf of Legalist to determine the debtor's ability to pay creditors' claims and by

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- 27 Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Supplemental Application.
 - This project occurred prior to my tenure at Stout.

General Motors and its affiliated debtors in the General Motors bankruptcy case, Case No. 09 50026, where Stout advised the debtors on the value of the real property, machinery and equipment
 and inventory related to over 5,000 dealerships and 47 manufacturing plants across the country).

The scope of Stout's services in those matters is similar to those proposed in this Chapter
11 Case.

6

7

II.

COMPENSATION AND FEE APPLICATIONS

8 Subject to the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local 9 Bankruptcy Rules, the United States Bankruptcy Court Northern District of California Guidelines 10 for Compensation and Expense Reimbursement of Professionals and Trustees effective February 11 19, 2014 (the "Local Guidelines"), and the Guidelines for Reviewing Applications for 12 Compensation and Reimbursement of Expenses (the "Appendix A Guidelines") issued by the 13 Office of the United States Trustee, Stout will charge for its professional services on an hourly 14 basis in accordance with the ordinary and customary hourly rates in effect at the time the services 15 are rendered.

16 The various roles of the Stout personnel who will or may work on this matter, and their 17 current hourly rates, subject to change from time to time, are as follows: Managing Director \$450 18 to \$675 per hour; Director \$325 to \$450 per hour; Senior Vice President \$300 to \$400 per hour; 19 Vice President \$225 to \$325 per hour; Associate \$200 to \$275 per hour; and Analyst \$150 to \$225 20 per hour. These rates are the normal billing rates charged by Stout in both bankruptcy and non-21 bankruptcy matters, to both debtor and non-debtor clients. Stout's hourly rates are comparable to 22 those charged by professionals of similar experience for engagements of scope and complexity 23 similar to this Chapter 11 Case. Stout will also seek reimbursement of actual and necessary out-24 of-pocket expenses in accordance with regular company policies.

Stout will maintain detailed, contemporaneous time records in six-minute intervals and
apply to this Court for payment of compensation and reimbursement of expenses in accordance
with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy
Rules, the Local Guidelines, the Appendix A Guidelines, and any additional procedures that may

be established by the Court in this Chapter 11 Case. Stout may apply to the Court to authorize a
monthly allowance that will permit provisional monthly payment of up to 80% of its fees and
100% of its expenses under the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt No. 170]. Stout understands that interim and
final fee awards are subject to approval by this Court.

Stout will use its best efforts to staff and supervise the engagement with appropriate
personnel using rates at the lower end of the hourly rate ranges stated above; however, there may
be requirements and circumstances of the case that require specialized expertise or time sensitive
assignments where certain personnel may be required at the higher end of the stated range.

10 Stout will charge for all services provided and for other charges and disbursements incurred 11 in connection with its provision of the Services. These customary items include, among other 12 things, travel and lodging expenses, business meals, costs of reproduction, research, 13 communications, legal counsel costs, applicable sales or excise taxes and other direct expenses. 14 Internal costs or overhead costs and document production services (including regular secretarial 15 and word processing time) will not be charged for separately. Stout has acknowledged that the 16 Committee, its constituents, its advisors or professionals shall not be liable for the fees, expenses 17 or other amounts payable to Stout.

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- 19

III.

DISCLOSURES CONCERNING DISINTERESTEDNESS

Stout received from Applicant a schedule of key parties in interest in this Chapter 11 Case,
a copy of which is attached hereto as <u>Schedule 1</u> (the "<u>Potential Parties List</u>").

To check and clear potential conflicts of interest in this case, as well as to identify all "connections" (as such term is used in Bankruptcy Rule 2014) to the Debtor, its creditors, other parties in interest, their respective attorneys and accountants, the United States Trustee for the Northern District of California (the "<u>U.S. Trustee</u>"), any person employed in the office of the U.S. Trustee, Stout has searched its electronic database for its connections to the entities listed on the Potential Parties List.

28

Other than as described below and with the exceptions of the representations noted in

1 Schedule 2, after diligent inquiry, I have ascertained (a) no connection, as such term is used in 2 section 101(14)(C) of the Bankruptcy Code, as modified by section 1107(b) and Bankruptcy Rule 3 2014(a), between Stout and any party in interest in this Chapter 11 Case, including with the Debtor, 4 its creditors, the U.S. Trustee, any person employed in the office of the U.S. Trustee or any other 5 party with an actual or potential interest in this Chapter 11 Case or their respective attorneys or 6 accountants; (b) Stout is not a creditor, equity security holder, or insider of the Debtor, other than 7 the amounts due to Stout in consideration for its services to the Committee; (c) none of Stout's 8 professionals is, or was within two years of the Petition Date, a director, officer, or employee of 9 the Debtor; and (d) Stout neither holds nor represents an interest adverse to the Debtor, its estate, 10 or any class of creditors because of any direct or indirect relationship to, connection with, or 11 interest in the Debtor, or for any other reason.

Stout will conduct an ongoing review of its files to ensure that no disqualifying
circumstances arise. If any new relevant facts or relationships are discovered, I will supplement
this declaration to the Court.

Stout will establish an ethical wall separating Stout's professionals retained for purposes of valuing sexual abuse claims and those retained for purposes of providing the Services described herein. Stout's protocol for establishing an ethical wall will include, among other things: (i) no overlap in staffing; (ii) restricting computer access to this matter to only those employees working on this engagement; (iii) prohibiting discussion of this engagement and the Services in the presence of screened employees; and (iv) maintaining separate time records and preparing separate fee applications for claims valuation and real estate valuation services.

I declare under penalty of perjury under the laws of the United States that the foregoing is
true and correct.

Executed this <u>9th</u> day of April 2025, in San Diego, California.
By: <u>/s/ Randi Rosen</u> *Randi Rosen*28
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SCHEDULE 1

BANKRUPTCY JUDGES

CHIEF JUDGE STEPHEN L. JOHNSON JUDGE CHARLES NOVACK JUDGE DENNIS MONTALI JUDGE HANNAH L. BLUMENSTIEL JUDGE M. ELAINE HAMMOND JUDGE ROGER L. EFREMSKY JUDGE WILLIAM LAFFERTY **BANKRUPTCY JUDGES STAFF** ALEGNA GOMEZ ALICE GIANG ALYSSA IVANCEVICH AMY LEITNER ANKEY THOMAS ANNA LEE ANNA ROSALES AUDREY GERVASI **BROOKE WILSON** CHEYANNA FUCHS **CINDY FAN** DALE DAVIS DAN SONDHEIM DINA KAKALIA LAURENT CHEN LORENA PARADA **RAENNA J. RORABECK RUBY BAUTISTA** SHANNON MOUNGER-LUM VENICE TAMPLIN-HENDERSON **BANKRUPTCY PROFESSIONALS – RETAINED ALVAREZ & MARSAL** FOLEY & LARDNER LLP

KURTZMAN CARSON CONSULTANTS LLC (KCC) **BANKS/LENDER/UCC LIEN PARTIES/ADMINISTRATIVE AGENTS** PRINCIPAL FINANCIAL GROUP ROMAN CATHOLIC CEMETERIES OF THE DIOCESE OF OAKLAND **UNION BANK** WELLS FARGO INST RETIREMENT & TRUST U.S. BANK ALBERTSONS/SAFEWAY AMERICAN EXPRESS APPLE FINANCIAL SERVICES C T CORPORATION SYSTEM CHASE CARDMEMBER SERVICE **CIT BANK** CIT FINANCE LLC **CITI BANK** DEUTSCHE BANK NATIONAL TRUST COMPANY GENERAL ELECTRIC CAPITAL CORPORATION HOME DEPOT CREDIT SERVICES NATIONAL EUCHARISTIC CONGRESS, INC. **RICOH BUSINESS SOLUTIONS RICOH USA INC** SCHWAB BANK THE SHERWIN WILLIAMS CO. U.S. BANK EQUIPMENT FINANCE VAR RESOURCES LLC WELLS FARGO VENDOR FINANCIAL

XEROX FINANCIAL SERVICES **BISHOP**

BISHOP CHAD ZIELINSKI BISHOP GORDON BENNETT. SJ BISHOP MICHAEL BARBER, S.J. BISHOP ROY CAMPBELL, JR.

CHANCELLOR

RICK MEDEIROS

COLLEGE OF CONSULTORS

FR. JOY KUMARTHUSSERIL

FR. KENNETH SALES

FR. LARRY YOUNG

FR. LAWRENCE D'ANJOU

FR. LEO EDGERLY JR.

FR. MARK WIESNER

FR. PAUL COLEMAN

CONTRACT COUNTER-PARTIES

AT&T

BEACON POINTE ADVISORS

FAITH CATHOLIC-PUBLISHING & **COMMUNICATIONS**

HELEN R. OSMAN

JIM MULVANEY

OFFICE INFORMATION SYSTEMS

PRINCIPAL CUSTODY SOLUTIONS

T MOBILE

TRANSWESTERN PROPERTY COMPANY WEST, INC.

VILLA MARIA DEL MAR

XEROX CORPORATION

ARMANINO LLP

ARTHUR J. GALLAGHER & CO. **INSURANCE BROKERS OF** CALIFORNIA, INC.

BANK DIRECT CAPITAL FINANCE. A DIVISION OF TEXAS CAPITAL BANK

CALIFORNIA PRIVATE SCHOOLS SELF-INSURANCE GROUP

CALIFORNIA PRIVATE SCHOOLS SELF-INSURANCE GROUP (CAPS-SIG)

CALIFORNIA PRIVATE SCHOOLS WORKERS' COMPENSATION SELF-**INSURANCE GROUP, INC.**

FAITH CATHOLIC

GALLAGHER

GALLAGHER BASSETT SERVICES, INC.

JAMES P. MULVANEY AND RAMONA G. MULVANEY

MERCY RETIREMENT AND CARE CENTER

MOREAU CATHOLIC HIGH SCHOOL

MOSS ADAMS LLP

RISK PLACEMENT SERVICES DBA RPS MONUMENT

RISK PLACEMENT SERVICES, INC. DBA RPS MONUMENT, ACTING PURSUANT TO A POWER OF ATTORNEY GRANTED BY CALIFORNIA PRIVATE SCHOOLS SELF-INSURANCE GROUP (CAPS-SIG)

STATE OF CALIFORNIA DEPARTMENT OF INDUSTRIAL RELATIONS OFFICE OF THE DIRECTOR

THE KAMER GROUP, INC.

THE PRUDENTIAL INSURANCE COMPANY OF AMERICA

VERACRUZ ADVISORY, LLC

MERCY RETIREMENT & CARE CENTER

DEACON

DEACON JORGE ANGEL

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DN. NOE GONZALEZ-ALFARO

DN. DAVID G. YOUNG

DEBTORS

ROMAN CATHOLIC BISHOP OF OAKLAND

DIRECTOR/OFFICER/OTHER INSIDERS

FATHER LAWRENCE C. D'ANJOU

PAUL BONGIOVANNI

THE MOST REVEREND MICHAEL C. BARBER, SJ

ADVENTUS

BISHOP EMERITUS JOHN S. CUMMINS

CATHOLIC CATHEDRAL CORPORATION OF EAST BAY

CATHOLIC CHARITIES OF THE DIOCESE OF OAKLAND

CATHOLIC CHURCH SUPPORT SERVICES

CATHOLIC FOUNDATION OF THE DIOCESE OF OAKLAND

CATHOLICA SOCIETATE

CHRIST THE LIGHT CATHEDRAL CORP

HAYWORD MORTUARY, INC.

LUMEN CHRISTI ACADEMIES

OAKLAND SOCIETY FOR THE PROPAGATION OF THE FAITH

RICK MEDEIROS

ROMAN CATHOLIC BISHOP OF OAKLAND LAY EMPLOYEES MONEY PURCHASE PENSION PLAN

ROMAN CATHOLIC CEMETERIES OF THE DIOCESE OF OAKLAND

ROMAN CATHOLIC FUNERAL SERVICES OF THE DIOCESE OF OAKLAND

ROMAN CATHOLIC WELFARE CORPORATION OF OAKLAND

THE CATHOLIC FUNERAL TRUST OF NORTHERN CALIFORNIA

THE DIOCESE OF OAKLAND PRIEST LONG TERM CARE PLAN

THE DIOCESE OF OAKLAND PRIEST PENSION PLAN

THE DIOCESE OF OAKLAND PRIEST SUPPLEMENTAL RETIREMENT PLAN

THE OAKLAND PAROCHIAL FUND, INC.

FINANCE COUNCIL MEMBERS

BILL UTIC

DAVID L. ASH

FRANK BALESTERI

REV. LAWRENCE D'ANJOU

JOHN TARMAN

HISTORICAL INSURANCE

AETNA INSURANCE COMPANY

AMERICAN HOME INSURANCE

CNA INSURANCE COMPANY

COMMERCIAL UNION

EMPLOYERS REINSURANCE

INA (ACE INSURANCE COMPANY)

INDUSTRIAL INDEMNITY

INSURANCE COMPANY OF AMERICA

LLOYD'S OF LONDON SYNDICATES 2623 (AFB) AND 623 (AFB)

ORDINARY MUTUAL

PACIFIC EMPLOYERS REINSURANCE

PACIFIC INDEMNITY

TRAVELERS INSURANCE COMPANY UNITED STATES FIRE INSURANCE

INSURANCE

ALLIED WORLD NATIONAL ASSURANCE COMPANY

ARTHUR J. GALLAGHER & CO.

ARTHUR J. GALLAGHER RISK MANAGEMENT SERVICES, LLC

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HUDSON INSURANCE COMPANY (EUCLID)

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THE HANOVER INSURANCE GROUP

TRAVELERS PROPERTY CASUALTY CO OF AMERICA

WESTCHESTER SURPLUS LINES INSURANCE

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CAPS-SIG

MARKEL INSURANCE COMPANY

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA

INTER-DIOCESAN ENTITY

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CARMEL OF JESUS, MARY & JOSEPH

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LANDLORDS

CATHOLIC CATHEDRAL CORPORATION OF EAST BAY

LITIGATION

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ST. EDWARD ST. ELIZABETH (OFM) ST. FELICITAS ST. FRANCIS OF ASSISI ST. IGNATIUS ST. ISIDORE ST. JAMES ST. JARLATH (OFM CONV) ST. JEROME ST. JOACHIM (SVD) ST. JOAN OF ARC ST. JOHN BAPTIST EL CERRITO PARISH ST. JOHN BAPTIST SAN LORENTO PARISH ST. JOHN VIANNEY ST. JOSEPH BASILICA ST. JOSEPH FREMONT PARISH ST. JOSEPH PINOLE PARISH ST. JOSEPH WORKER ST. LEANDER ST. LEO ST. LOUIS BERTRAND ST. MARGARET MARY ST. MARK ST. MARY ST. MARY MAGDALEN ST. MICHAEL ST. MONICA ST. PATRICK OAKLAND PARISH ST. PATRICK RODEO PARISH ST. PAUL (OFM CONV) ST. PERPETUA

-/-04/09/2 of 18 ST. PETER MARTYR ST. PHILIP - ST. ALBERT (MF) ST. RAYMOND ST. ROSE – ST. PATRICK ST. STEPHEN ST. THERESA TRANSFIGURATION PARISH ALL SAINTS CHURCH ALL SAINTS SCHOOL **ASPIRE PUBLIC SCHOOLS BISHOP O'DOWD HIGH SCHOOL** CATHEDRAL OF CHRIST THE LIGHT CATHOLIC COMMUNITYOF PLEASANTON CHRIST THE KING CHURCH CHURCH OF THE ASSUMPTION CHURCH OF THE GOOD SHEPHERD COMMISSARIAT OF THE HOLY LAND CONGREGATION OF FAITHFUL COMPANIONS OF JESUS CORPUS CHRISTI CHURCH DIVINE MERCY CHURCH FR. VINCENT LAMPERT HOLY NAMES HIGH SCHOOL HOLY SPIRIT CHURCH HOLY SPIRIT/NEWMAN HALL CHURCH HOLY TRINITY CATHOLIC CHURCH IMMACULATE HEART OF MARY CHURCH MATTHEW VINCENT MOREAU CATHOLIC HIGH SCHOOL MOST HOLY ROSARY CHURCH OUR LADY OF GOOD COUNSEL

OUR LADY OF GRACE CHURCH OUR LADY OF GUADALUPE CHURCH OUR LADY OF LOURDES CHURCH OUR LADY OF MERCY CHURCH OUR LADY OF THE ROSARY CHURCH OUR LADY QUEEN OF THE WORLD PARISH SAFETY POPE ST. JOHN XXIII NATIONAL **SEMINARY** QUEEN OF ALL SAINTS CHURCH ROMAN CATHOLIC CHURCH IN THE STATE OF HAWAII SACRED HEART CATHEDRAL PREPARATORY SACRED HEART CHURCH SANTA MARIA CHURCH SHEA PROPERTIES SISTERS OF MERCY SISTERS OF ST. JOSEPH SISTERS OF THE HOLY CROSS SRS. OF ST. JOSEPH OF CARONDELET ST. AGNES CHURCH ST. AGNES SCHOOL ST. ALBERT'S PRIORY ST. AMBROSE CHURCH ST. ANNE CHURCH ST. ANNE'S HOME ST. ANTHONY CHURCH ST. ANTHONY SCHOOL ST. ANTHONY-MARY HELP OF CHRISTIANS CHURCH ST. ANTHONY-MARY, HELP OF CHRISTIANS

ST. AUGUSTINE CHURCH

ST. BARNABAS CHURCH

- ST. BEDE CHURCH
- ST. BENEDICT CHURCH
- ST. BERNARD CHURCH
- ST. BONAVENTURE CHURCH
- ST. BONIFACE CHURCH
- ST. CALLISTUS CHURCH
- ST. CATHERINE OF SIENA CHURCH
- ST. CHARLES BORROMEO CHURCH
- ST. CLEMENT CHURCH
- ST. CLEMENT SCHOOL
- ST. COLUMBA CHURCH
- ST. CORNELIUS CHURCH
- ST. DAVID OF WALES CHURCH
- ST. EDWARD CHURCH
- ST. ELIZABETH CHURCH
- ST. ELIZABETH CYO
- ST. ELIZABETH ELEMENTARY SCHOOL
- ST. FELICITAS CHURCH
- ST. FELICITAS SCHOOL
- ST. FRANCIS OF ASSISI CHURCH
- ST. FRANCIS OF ASSISI SCHOOL
- ST. IGNATIUS OF ANTIOCH CHURCH
- ST. ISIDORE CHURCH
- ST. JAMES CATHEDRAL
- ST. JAMES THE APOSTLE CHURCH
- ST. JARLATH CHURCH
- ST. JEROME CHURCH
- ST. JOACHIM CHURCH
- ST. JOACHIM SCHOOL
- ST. JOAN OF ARC CHURCH
- ST. JOHN THE BAPTIST CHURCH

- ST. JOHN VIANNEY CHURCH ST. JOSEPH CHURCH ST. JOSEPH NOTRE DAME HIGH SCHOOL ST. JOSEPH SCHOOL ST. JOSEPH THE WORKER CHURCH ST. LEANDER CHURCH ST. LEANDER SCHOOL ST. LEO THE GREAT CHURCH ST. LEO THE GREAT SCHOOL ST. LOUIS BERTRAND CHURCH ST. MARGARET MARY CHURCH ST. MARK CHURCH ST. MARY CHURCH ST. MARY MAGDALEN CHURCH ST. MICHAEL CHURCH ST. MONICA CHURCH ST. PATRICK CHURCH ST. PATRICK MISSION ST. PATRICK'S SEMINARY & **UNIVERSITY** ST. PAUL CHURCH ST. PAUL SCHOOL ST. PERPETUA CHURCH ST. PETER MARTYR CHURCH ST. PHILIP NERI CHURCH ST. PHILIP NERI SCHOOL ST. RAYMOND PENAFORT CHURCH ST. RAYMOND SCHOOL ST. ROSE OF LIMA CHURCH
- ST. STEPHEN CHURCH
- ST. THERESA CHURCH

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WORD ON FIRE CATHOLIC MINISTRIES

TEF ARCHITECTURE

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EAST BAY MUNICIPAL DISTRICT

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PETER KENTON FREEDOM PROFESSIONAL SERVICES ORDER OF MALTA CLINIC THE TIDINGS CORPORATION FELIX LIN MITCH HUGHES <u>VICTIM ASSISTANCE</u> COORDINATOR

SR. DOTTIE PETERSON

Schedule 2

Disclosures Regarding Connections with Potential Parties in Interest

In connection with the retention of Stout to provide consulting and expert witness services for the benefit of the Committee, Stout has been provided a list of the Debtor's creditors and other persons identified as parties-in-interest in the Debtor's bankruptcy case. Stout's conflicts check is done by searching a computer database maintained by Stout for the specified names listed in Schedule 1. Stout has not been provided, nor has it searched, the names of any parents, subsidiaries, or affiliates of the entities listed in Schedule 1, and it is possible that Stout has been engaged by some of these entities in matters unrelated to the Debtor or this bankruptcy. If the information provided to Stout for use in the search of Stout's database contains a misspelling, a connection could have been missed. However, no known misspellings are believed to exist. Additionally, due to the magnitude of the Stout computer database, many common names (for example, those of common individual surnames, etc.) appear repetitively. Lastly, given the common names given to parishes operating separately under different dioceses, Stout has assumed that parishes by the same name but associated with retentions involving dioceses other than the Debtor are not the same party as those searched for purposes of this matter.

Stout is a diversified professional services firm with offerings in Investment Banking & Restructuring, Transaction Advisory, Valuation Advisory and Accounting & Reporting Advisory, in addition to its work related to disputes, claims and investigations. For the avoidance of doubt and in an abundance of caution, this Schedule 2 discloses connections across the firm and is not limited to dispute-related work.

Stout has identified and included in the list below the persons/entities to whom/which Stout has a connection unrelated to this bankruptcy case.

Entity	Relationship to Debtor	Connection to Stout
Foley & Lardner	Bankruptcy Professionals - Retained	Client of the firm in matters unrelated to this Chapter 11 Case
Matthews & Associates	Litigation	Client of the firm in matters unrelated to this Chapter 11 Case
AT&T Mobility	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
Best Best & Krieger	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
Comcast	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
Department of Justice	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case; Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case

Parties With Whom Stout Has a Connection

Entity	Relationship to Debtor	Connection to Stout
FedEx	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
Institutional Shareholder Services	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
Norton Rose Fulbright	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
PNC Bank N.A.	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
The Davey Tree Expert Company	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
American Express	Banks/Lender/UCC Lien Parties/Administrative Agents	Client of the firm in matters unrelated to this Chapter 11 Case; Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
CT Corporation	Banks/Lender/UCC Lien Parties/Administrative Agents	Client of the firm in matters unrelated to this Chapter 11 Case
Sherwin Williams	Banks/Lender/UCC Lien Parties/Administrative Agents	Client of the firm in matters unrelated to this Chapter 11 Case
US Bank	Banks/Lender/UCC Lien Parties/Administrative Agents	Client of the firm in matters unrelated to this Chapter 11 Case
AT&T	Contract Counter-Parties	Client of the firm in matters unrelated to this Chapter 11 Case; Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Arthur J. Gallagher	Insurance	Client of the firm in matters unrelated to this Chapter 11 Case
Xerox Corporation	Contract Counter-Parties	Client of the firm in matters unrelated to this Chapter 11 Case; Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
CNA Insurance Companies	Historical Insurance	Client of the firm in matters unrelated to this Chapter 11 Case; Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Lexington Insurance Company	Insurance	Client of the firm in matters unrelated to this Chapter 11 Case; Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Liberty Surplus Insurance Corp.	Insurance	Client of the firm in matters unrelated to this Chapter 11 Case; Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
CDW	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case

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Entity	Relationship to Debtor	Connection to Stout
Cushman & Wakefield	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
Hanover Insurance	Insurance	Client of the firm in matters unrelated to this Chapter 11 Case; Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Humana	Insurance	Client of the firm in matters unrelated to this Chapter 11 Case
Stericycle	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case; Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Verizon	Vendors	Client of the firm in matters unrelated to this Chapter 11 Case
Anthem Blue Cross Life and Health Insurance Company	Vendors	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
ACE Insurance Company	Historical Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Aetna Insurance	Historical Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Commercial Union Ins. Co.	Historical Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Employers Reinsurance Corporation	Historical Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Insurance Company of North America	Historical Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Travelers Insurance Company	Historical Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
United States Fire Insurance Company	Historical Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Church Mutual Insurance Company	Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Houston Casualty Company	Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Hudson Insurance Company	Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
LLoyds of London	Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Markel International Insurance Company Limited	Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
National Union Fire Insurance Company	Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case

Entity	Relationship to Debtor	Connection to Stout
Travelers Property Casualty Company of America	Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case
Westchester Surplus Lines Insurance Company	Insurance	Opposing Party of client(s) of the firm in matters unrelated to this Chapter 11 Case