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*Counsel for the Debtor  
and Debtor in Possession***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

**DECLARATION OF ATILA BARDOS IN  
SUPPORT OF DEBTOR'S MOTION TO  
AMEND ORDER ESTABLISHING  
PROCEDURES FOR INTERIM  
COMPENSATION AND REIMBURSEMENT  
OF EXPENSES OF PROFESSIONALS**

Judge: Hon. William J. Lafferty

Date: May 21, 2025

Time: 10:30 a.m.

Place: United States Bankruptcy Court  
1300 Clay Street  
Courtroom 220  
Oakland, CA 94612

1 I, Attila Bardos, hereby declare as follows:

2 1. I am the chief financial officer of The Roman Catholic Bishop of Oakland (“the Debtor”).  
3 I make this declaration in support of the *Debtor’s Motion to Amend Order Establishing Procedures for*  
4 *Interim Compensation and Reimbursement of Expenses of Professionals*, filed concurrently herewith (the  
5 “Motion”).<sup>1</sup>

6 2. The Debtor has worked tirelessly for nearly two years to resolve this case in a consensual  
7 manner that would allow it to fairly resolve the claims of survivors of sexual abuse while permitting it to  
8 continue its mission to support the faithful and provide charity in the East Bay Region. So far, these efforts  
9 have only been partially successful, but have come at a very high monetary cost.

10 3. The Debtor cannot continue to sustain the level of administrative expenses incurred in this  
11 Chapter 11 Case. As of March 31, 2025, the Debtor has paid approximately \$29.2 million in professional  
12 fees, including its own professionals as well as the Committee’s professionals and the Mediators.  
13 Additional fees continue to accrue and are being paid as provided for in orders of the Court.

14 4. The Debtor’s cash flow has been compromised by the payment of professional fees, and  
15 its practical liquidity has dipped under \$3 million as shown in the Cash Forecast attached to the Motion.  
16 If the current rate of administrative expenses continues at its current pace, the Debtor believes that it will  
17 essentially have zero practical liquidity in September 2025 unless additional measures are taken.

18 5. While the Debtor continues to evaluate all of its options to preserve its cash and maintain  
19 its cash flow, a reduction in the monthly amounts and the holdback it is required to every four months, as  
20 set forth in the Motion, will significantly assist these efforts.

21 Executed on April 23, 2025, at Oakland, California.

22 /s/ Attila Bardos  
23 Attila Bardos  
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<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.