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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 AMENDING CERTAIN
DATES AND DEADLINES IN
CONNECTION WITH
CONFIRMATION OF THE
DEBTOR'S THIRD AMENDED PLAN
OF REORGANIZATION**

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 April 15, 2025, the Court entered the *Order Setting Certain Dates and*
2 *Deadlines in Connection with Confirmation of the Debtor's Third Amended Plan of*
3 *Reorganization* [Dkt. 1893] (the "**Original Scheduling Order**").

4 **WHEREAS**, the Parties have agreed to amend certain deadlines set forth in the Original
5 Scheduling Order as set forth herein, subject to further possible extension.

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

11 1. The following amended schedule (the "**Amended Schedule**") will govern dates and
12 deadlines for the events below, with all hearing start times to be set by the Court at a later date:

Event	Original Deadline	Amended Deadline
Disclosure of rebuttal experts (including experts' names and topics)	June 9, 2025	June 9, 2025
Conclusion of fact discovery	June 9, 2025	June 13, 2025 ¹
Affirmative Expert Reports due	June 23, 2025	June 30, 2025
Rebuttal Expert Reports due	July 11, 2025	July 17, 2025
Deadline to complete expert depositions	July 25, 2025	July 28, 2025
Deadline to file Motions <i>in Limine</i>	August 1, 2025	August 4, 2025
Plan Objection Deadline	August 6, 2025	August 6, 2025
Exchange deposition designations	August 8, 2025	August 8, 2025
Responses to Motions <i>in Limine</i> due (no replies to Motions <i>in Limine</i>)	August 8, 2025	August 11, 2025
Hearing on Motions <i>in Limine</i>	August 12, 2025	August 14, 2025

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27 ¹ The Committee shall produce one or more witnesses in response to the *Debtor's Notice of Intent to Take Deposition*
28 *of the Official Committee of Unsecured Creditors' Corporate Representative* on a date agreed to by the Debtor
and the Committee. The Debtor and Committee agree this deposition may take place after the deadline for
concluding fact discovery, but not later than July 31, 2025.

1	Pre-trial Conference	August 12, 2025	August 14, 2025
2	Exchange deposition counter-designations	August 18, 2025	August 18, 2025
3	Briefs in support of Confirmation due	August 18, 2025	August 18, 2025
4	Draft Pretrial Order prepared by Debtor to be circulated to Committee	August 18, 2025	August 18, 2025
5			
6	Deadline to file declarations constituting direct testimony of all witnesses (fact and expert)	August 18, 2025	August 18, 2025
7	Deadline to submit Joint Pretrial Order and Witness and Exhibit Lists	August 21, 2025	August 21, 2025
8			
9	Commencement of Confirmation Hearing	August 25, 2025	August 25, 2025
10	Additional Confirmation Hearing dates	August 26, 28, 29, 2025 September 4, 5, 2025	August 26, 28, 29, 2025 September 4, 5, 2025
11			
12			

13 3. To the extent not amended in the above Schedule, the Original Scheduling Order
14 remains in full force and effect.

15 4. Nothing in this Order shall preclude any party, and all parties reserve the right, from
16 supplementing written discovery requests based on the information learned from initial discovery
17 responses.

18 5. Nothing in this Order shall preclude any party-in-interest from seeking to adjourn
19 the deadlines set forth in the Schedule, or any other party-in-interest from opposing such request,
20 for good cause shown. Parties must make reasonable efforts to meet and confer regarding any
21 change to the dates set forth in the Schedule prior to seeking Court intervention.

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Dated: June 9, 2025

FOLEY & LARDNER LLP

By: /s/ Anne Marie Uetz
Ann Marie Uetz

Attorneys for the Debtor and Debtor In Possession

Dated: June 9, 2025

**KELLER BENVENUTTI KIM LLP
LOWENSTEIN SANDLER LLP**

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

Counsel for the Official Committee of Unsecured Creditors