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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

**APPELLANTS LMP'S STATEMENT
 OF ISSUES ON APPEAL,
 DESIGNATION OF ITEMS TO BE
 INCLUDED IN THE RECORD ON
 APPEAL, AND CERTIFICATE
 REGARDING TRANSCRIPTS**



Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, made applicable by Rule 6(c)(2)(A) of the Federal Rules of Appellate Procedure, Appellants Certain Underwriters at Lloyd's, London and Certain London Market Insurers ("LMI" or "Appellants")¹ submit the following: (i) statement of issues to be considered on appeal, (ii) designation of items to be included in the record on appeal, and (iii) certificate regarding transcripts. The Appellants appeal from the Order Granting Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court, Docket No. 2168, and all other subsumed judgments, order, and decrees brought up for review in the appeal.

STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL

Appellants present the following statement of issues to be considered on appeal:

1. Whether the Bankruptcy Court erred in entering the Order Granting Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court, Docket No. 2168

DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Appellants submit the following designation of items to be included in the record on appeal, which includes all exhibits, appendices, and/or addenda:

Item	Date	Dkt	Description
1.	05/08/2023	1	Chapter 11 Voluntary Petition for Non-Individual, Fee Amount \$1738, Filed by The Roman Catholic Bishop of Oakland.
2.	05/08/2023	19	Declaration of Charles Moore, Managing Directors of Alvarez & Marsal North America, LLC, Proposed Restructuring Advisor to The Roman Catholic Bishop of Oakland, in Support of Chapter 11 Petition and First Day Pleadings

¹ London Market Insurers are Certain Underwriters at Lloyd's, London, subscribing severally and not jointly to Slip Nos. CU 1001 and K 60034 issued to the Roman Catholic Bishop of San Francisco, and Nos. K 78318 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.).

3.	11/20/2024	1460	Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court
4.	11/20/2024	1461	Declaration of Gabrielle L. Albert In Support of Motion of the Official committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court
5.	11/20/2024	1467	Notice of (I) Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed In State Court; and (II) The Official Committee of Unsecured Creditors' Motion for Standing to Prosecute Claims of the Debtor's Estate
6.	11/22/2024	1471	Debtor's Application for Order Enlarging Time for Filing of Response Briefs and For Notice of Hearing on (1) The Committee's Motion to Lift the Automatic Stay, and (2) The Committee's Motion for Derivative Standing
7.	11/22/2024	1472	Declaration of Matthew D. Lee In Support of Debtor's Application for Order Enlarging Time for Filing of Response Briefs and For Notice of Hearing on (1) The Committee's Motion to Lift the Automatic Stay, and (2) The Committee's Motion for Derivative Standing
8.	11/25/2024	1473	Declaration of Matthew D. Lee In Support of Debtor's Application for Order Enlarging Time for Filing of Response Briefs and For Notice of Hearing on (1) The Committee's Motion to Lift the Automatic Stay, and (2) The Committee's Motion for Derivative Standing
9.	11/25/2024	1475	the Official Committee of Unsecured Creditors' Objection to the Debtor's Application for Order Enlarging Time for Filing of Response Briefs and For Notice of Hearing on the Committee's Motions (1) To Lift the Automatic Stay and (2) For Derivative Standing
10.	11/25/2024	1476	Declaration of Gabrielle L. Albert In Support of Motion of the Official Committee of Unsecured Creditors' Objection to the Debtor's Application for order Enlarging Time for Filing of Response Briefs and For Notice of Hearing on the Committee's Motions (1) To Lift the Automatic Stay and (2) For Derivative Standing
11.	11/26/2024	1481	Order Scheduling Status Conference
12.	12/05/2024	1497	Transcript Regarding Hearing Held November 27, 2024
13.	12/23/2024	1563	Joinder of Certain Sexual Abuse Claimants to the Committee of Unsecured Creditors' Motion for Relief from Automatic Stay

14.	12/24/2024	1568	Transcript Regarding Hearing Held December 18, 2024
15.	12/26/2024	1570	Joinder by the Zalkin Law Firm Claimants to the Committee of Unsecured Creditors' Motion for Relief from Automatic Stay
16.	12/26/2024	1572	State Court Co-Liaison Counsel's Joinder in Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court
17.	12/26/2024	1573	The Panish/PCVA Claimants' Joinder to the Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court
18.	12/30/2024	1581	Debtor's Brief in Opposition to the Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court
19.	12/30/2024	1582	Declaration of Mark C. Moore In Support of Debtor's Brief in Opposition to the Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court
20.	12/30/2024	1583	Certain Insurers' Opposition to (i) The Committee's Motion to Lift the Automatic Stay to Permit Six Abuse Claims to Proceed in State Court and (ii) Joinders Therein by Counsel for Certain Claimants
21.	12/30/2024	1585	Westport Insurance Corporation's Opposition to (1) The Committee's Motion to Lift the Automatic Stay and (2) The Committee's Motion to Prosecute Claims Against the Insurers
22.	12/30/2024	1589	Joinder to Westport Insurance Corporation's Opposition to (1) The Committee's Motion to Lift the Automatic Stay and (2) The Committee's Motion to Prosecute Claims Against the Insurers
23.	12/30/2024	1591	Pacific Insurers Supplemental Opposition to (1) The Committee's Motion to Lift the Automatic Stay and (2) The Committee's Motion to Prosecute Claims Against the Insurers
24.	01/06/2025	1603	Reply of the Official Committee of Unsecured Creditors In Support of the Motion to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court
25.	01/14/2025	1630	Transcript Regarding Hearing Held January 8, 2025 re: Hearing
26.	01/17/2025	1645	Transcript Regarding Hearing Held January 15, 2025 re: Motion Hearing
27.	01/23/2025	1659	Transcript Regarding Hearing Held January 16, 2025 re: Hearing, Motion, Status Conference
28.	01/27/2025	1667	Transcript Regarding Hearing Held January 21, 2025 re: Motion Hearing
29.	02/11/2025	1721	Order on Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court

30.	06/25/2025	2093	Motion for Relief from Stay Fee Amount \$199, Filed by Creditor Committee Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland (Attachments: # 1 Exhibit A)
31.	06/25/2025	2094	Declaration of Gabrielle L. Albert in Support of <i>Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs Personal Injury Claim</i> (RE: related document(s)2093 Motion for Relief From Stay). Filed by Creditor Committee Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9)
32.	06/25/2025	2095	Notice of Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court
33.	06/25/2025	2097	Corrected Notice of Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court
34.	07/09/2025	2112	Brief/Memorandum in Opposition to <i>Debtors Opposition to the Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs Personal Injury Claims to Proceed in State Court</i> (RE: related document(s)2093 Motion for Relief From Stay). Filed by Debtor The Roman Catholic Bishop of Oakland
35.	07/09/2025	2113	Declaration <i>Declaration of Thomas F. Carlucci in Support of Debtors Opposition to the Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs Personal Injury Claims to Proceed in State Court</i> (RE: related document(s)2112 Opposition Brief/Memorandum). Filed by Debtor The Roman Catholic Bishop of Oakland
36.	07/09/2025	2114	Declaration <i>Declaration of Mark C. Moore in Support of Debtors Opposition to the Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs Personal Injury Claims to Proceed in State Court</i> (RE: related document(s)2112 Opposition Brief/Memorandum). Filed by Debtor The Roman Catholic Bishop of Oakland (Attachments: # 1 Ex A - First Opposition)
37.	07/09/2025	2115	Brief/Memorandum in Opposition to <i>Certain Insurers' Opposition to the Renewed Motion of the Official</i>

			<i>Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs Personal Injury Claims to Proceed in State Court</i> (RE: related document(s)2093 Motion for Relief From Stay). Filed by Creditor Westport Insurance Corporation
38.	07/09/2025	2117	Brief/Memorandum in Opposition to (RE: related document(s)2093 Motion for Relief From Stay). Filed by Creditors Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America, Pacific Employers Insurance Company, Pacific Indemnity Company, Insurance Company of North America, and Pacific Employers Insurance Company, Westchester Fire Insurance Company (Attachments: # 1 Declaration of Justine M. Daniels # 2 Exhibit A # 3 Exhibit B)
39.	07/10/2025	2120	Joinder to <i>Pacific Insurers' Opposition to the Committee's Renewed Motion to Lift the Automatic Stay</i> (RE: related document(s)2117 Opposition Brief/Memorandum). Filed by Interested Party Certain Underwriters at Lloyd's of London Subscribing to Slip Nos. CU 1001, K66034, K78138 and CU 3061
40.	07/14/2025	2129	Reply <i>The Official Committee of Unsecured Creditors' Reply in Support of its Renewed Motion to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court</i> (RE: related document(s)2093 Motion for Relief From Stay). Filed by Creditor Committee Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland
41.	07/14/2025	2140	Joinder (RE: related document(s)2093 Motion for Relief From Stay). Filed by Interested Party The Zalkin Law Firm, P.C.
42.	07/16/2025	2147	Motion to Continue Hearing On Confirmation and to Reset Confirmation Schedule (RE: related document(s)1884 Notice of Hearing filed by Debtor The Roman Catholic Bishop of Oakland). Filed by Debtor The Roman Catholic Bishop of Oakland
43.	07/17/2025	2151	Response (RE: related document(s)2147 Motion to Continue/Reschedule Hearing). Filed by Creditors Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America, Pacific Employers Insurance Company, Pacific Indemnity Company, Pacific Indemnity Company, Insurance Company of North America, and Pacific Employers Insurance Company

44.	07/21/2025	2158	Transcript regarding Hearing Held 7/16/2025 RE: Motion Hearing. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. Until that time the transcript may be viewed at the Bankruptcy Court or a copy may be obtained from the official court transcriber, 800-257-0885.
45.	07/25/2025	2168	Order Granting Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court (Related Doc # 2093)
46.	08/08/2025	2201	Notice of Appeal and Statement of Election filed by Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation
47.	08/08/2025	2202	Notice of Appeal and Statement of Elections filed by Pacific Indemnity Company, Insurance Company of North America, Pacific Employers Insurance Company, and Westchester Fire Insurance Company
48.	08/08/2025	2203	Notice of Appeal to District Court <i>Notice Of Appeal And Statement Of Election</i> , Fee Amount \$ 298.. Transmission of Record to District Court due by 09/8/2025 . Filed by Interested Party Certain Underwriters at Lloyd's of London Subscribing to Slip Nos. CU 1001, K66034, K78138 and CU 3061
49.	08/11/2025	2207	Notice of Appeal and Statement of Election filed by Continental Casualty Company
50.	08/12/2025	2214	Transcript Regarding Hearing Held on July 18, 2025

1 **CERTIFICATE REGARDING TRANSCRIPTS PURSUANT TO BANKRUPTCY RULE**

2 **8009(b)**

3 Pursuant to Rule 8009(b)(1) of the Federal Rules of Bankruptcy Procedure, made applicable
4 by Rule 6(c)(2)(A) of the Federal Rules of Appellate Procedure, Appellants hereby certify that they
5 have already ordered all the hearing transcripts that they intend to use in their appeal and are not
6 ordering any additional transcripts.

7 Dated: August 22, 2025

Respectfully submitted,

8 By: /s/ Jeff D. Kahane

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