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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

Chapter 11

**APPLICATION FOR ORDER
SHORTENING TIME FOR NOTICE OF
HEARING ON DEBTOR'S RENEWED
MOTION FOR ENTRY OF AN ORDER
APPROVING SALE OF REAL PROPERTY
(1822 San Antonio Avenue)**

[No Hearing Required]

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I.
INTRODUCTION

The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor” or “RCBO”) in the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case” or the “Bankruptcy Case”), hereby files this application (the “Application”) for entry of an order pursuant to Bankruptcy Local Rule (“B.L.R.”) 9006-1 shortening time for notice of a hearing on the Debtor’s Renewed Motion for Entry of an Order Approving Sale of Real Property (1822 San Antonio Avenue) [Docket No. 2584], filed on January 28, 2025 (the “Motion”).¹

The Debtor seeks a hearing on the Motion concurrent with the Status Conference set for 10:30 a.m. on February 4, 2026. The Debtor’s proposed order shortening notice is attached hereto as **Exhibit A**. The Debtor has received confirmation that the Committee does not oppose shortening notice to set the Motion for hearing concurrent with the Status Conference.

In support of this Application, the Debtor submits the concurrently filed declaration of Shane J. Moses, counsel for the Debtor, and respectfully represents as follows:

II.
BACKGROUND

A. General Background

On May 8, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for chapter 11 bankruptcy relief under the Bankruptcy Code. The Debtor continues to operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108 of Title 11 of the United States Code (the “Bankruptcy Code”). On May 23, 2023, the Office of the United States Trustee for Region 17 (the “US Trustee”) appointed the Committee in this Chapter 11 Case.

B. Relief Requested in the Motion

By the Motion, the Debtor requests an order approving sale of an unencumbered single-family house located at 1822 San Antonio Avenue in Alameda California (the “1822 House”), approving payment of broker fees and costs of sale, and providing related relief. The sale price is \$1,170,000, and is the result

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

1 of a thorough marketing process and call for highest and best bids. The Debtor's prior motion for sale of
2 the 1822 House (the "Prior Motion") was withdrawn because the buyers were unwilling to proceed with
3 the transaction for reasons unrelated to the property or the sale contract. As described in the Motion, the
4 Debtor's real estate agents renewed the listing, sought additional bids, and were able to obtain a bid that
5 is \$64,000.00 higher than the prior sale price. Through the renewed Motion, the Debtor seeks approval of
6 that sale.

7 **III.**

8 **REQUEST FOR ORDER SHORTENING TIME**

9 Under Federal Rule of Bankruptcy Procedure 9006(c) and L.B.R. 9006-1(c) the Court may shorten
10 time for notice upon a showing of good cause. For the reasons set forth herein, there is good cause to
11 shorten notice as to a hearing on the Motion.

12 The Debtor requests that the Court set the Motion for hearing on February 4, 2026, at 10:30 a.m.,
13 concurrent with the scheduled status conference and motion hearing already scheduled at the same date
14 and time. The Debtor further requests that the Court provide that any opposition to the Motion may be in
15 writing not later than noon on February 3, 2026, or made orally at the hearing.

16 In compliance with the requirements of B.L.R. 9006-1(c), the Debtor states as follows:

17 The reason for the requested shortened time. The Sale Contract, a copy of which is attached to
18 the Declaration of Attila Bardos filed in support of the Motion [Docket No. 2585] provides for close of
19 escrow not later than 10 days after acceptance, which would be February 6, 2026. Not obtaining entry of
20 an order prior to this date could jeopardize the sale and the approximately \$1.1 million it will generate for
21 the Debtor's estate. Further, the Debtor urgently needs the proceeds of sale to pay administrative expenses.
22 Both of the foregoing reasons require a hearing on shortened notice.

23 Previous time modifications relating to the subject matter of the request. No previous requests
24 have been made to shorten time with respect to the Motion.

25 The effect of the request for shortened time. The Debtor does not anticipate any adverse impact
26 on the schedule for the case or proceeding. On the contrary, the time modification requested herein will
27 allow the Debtor to receive much needed cash, to the extent the Motion is granted. Additionally, the Debtor
28 notes that there were no objections to the Prior Motion for sale of the 1822 House, which sought

APPLICATION TO SHORTEN TIME

1 substantially the same relief, except that the current motion has different Buyers and somewhat higher
2 purchase price.

3 Efforts to speak with responding parties. The Debtor's counsel has communicated with the counsel
4 for the Committee regarding the request herein for a hearing on shortened notice. Specifically, on the
5 evening of Wednesday, January 28, 2026, Debtor's attorney Shane Moses emailed attorneys for the
6 Committee Brent Weisenberg and Jeffrey Prol, informing them of the new sale contract and the Motion,
7 and requesting consent for shortening of time to have the Motion heard on February 4, 2026.

8 On Thursday, January 29, 2026, attorney Prol sent an email reply confirming that the Committee
9 does not object to the requested shortened time.

10 Service of notice of hearing. The Debtor requests a determination that notice of the hearing on the
11 Motion shall be sufficient provided that, not later than one business day following entry of an order
12 shortening notice, the Debtor serves notice of the hearing on the Motion, the Motion, and all supporting
13 papers on the Core Service List pursuant to the Court's *Final Order Approving Special Noticing and*
14 *Confidentiality Procedures* [Docket No. 292].

15 **IV.**
16 **CONCLUSION**

17 WHEREFORE, the Debtor requests that the Court enter an order in the form attached hereto
18 granting the relief requested herein to shorten notice for the Motion and allow for a notice of hearing.

19 DATED: January 29, 2026

20 **FOLEY & LARDNER LLP**

21 Eileen R. Ridley
22 Shane J. Moses
23 Ann Marie Uetz
24 Matthew D. Lee
25 Mark C. Moore

26 /s/ Shane J. Moses

27 SHANE J. MOSES

28 *Counsel for the Debtor
and Debtor in Possession*

APPLICATION TO SHORTEN TIME

EXHIBIT A

1 **FOLEY & LARDNER LLP**

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18 *and Debtor in Possession*

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23 **UNITED STATES BANKRUPTCY COURT**
24 **NORTHERN DISTRICT OF CALIFORNIA**
25 **OAKLAND DIVISION**

26 In re:
27 THE ROMAN CATHOLIC BISHOP OF
28 OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL
Chapter 11

**ORDER SHORTENING TIME FOR NOTICE
OF HEARING ON DEBTOR’S RENEWED
MOTION FOR ENTRY OF AN ORDER
APPROVING SALE OF REAL PROPERTY
(1822 San Antonio Avenue)**

29 The Court, having considered the *Application for Order Shortening Time for Notice of Hearing on*
30 *Debtor’s Renewed Motion for Entry of an Order Approving Sale of Real Property (1822 San Antonio*
31 *Avenue)* [Docket No. ____] filed on January 28, 2026 (the “Application”), by the Roman Catholic Bishop
32 of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor” or
33 “RCBO”) in the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case” or the “Bankruptcy
34 Case”) and good cause appearing,

1 **IT IS HEREBY ORDERED THAT:**

2 1. The Application is granted.

3 2. The *Debtor's Renewed Motion for Entry of an Order Approving Sale of Real Property*
4 *(1822 San Antonio Avenue)* [Docket No. 2584] (the "Motion") may be noticed for hearing on February 4,
5 2026, concurrent with the other hearings in the Bankruptcy Case currently set for the same date (the
6 "Hearing").

7 3. Opposition to the Motion, if any, may be made in writing filed with the Court and served
8 on counsel for the Debtor not later than 12:00 noon on February 3, 2026, or may be made orally at the
9 hearing.

10 4. Time for notice of the Hearing is shortened to the extent that notice of the Hearing on the
11 Motion and the deadline for opposition to the Motion shall be sufficient provided that, not later than one
12 business day following entry of this Order, the Debtor serves notice of the hearing on the Motion, the
13 Motion, and all supporting papers on the Core Service List pursuant to the Court's *Final Order Approving*
14 *Special Noticing and Confidentiality Procedures* [Docket No. 292].

15 5. This Court shall retain jurisdiction with respect to all matters arising from or related to the
16 implementation and/or interpretation of this Order.

17 **END OF ORDER**

COURT SERVICE LIST

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All ECF Recipients.