

FOLEY & LARDNER LLP

Eileen R. Ridley (CA Bar No. 151735)
Tel: (415) 438-6469; eridley@foley.com
Shane J. Moses (CA Bar No. 250533)
Tel: (415) 438-6404; smoses@foley.com
Ann Marie Uetz (admitted *pro hac vice*)
Tel: (313) 234-7114; auetz@foley.com
Matthew D. Lee (admitted *pro hac vice*)
Tel: (608) 258-4203; mdlee@foley.com
Geoffrey S. Goodman (admitted *pro hac vice*)
Tel: (312) 832-4515; ggoodman@foley.com
Mark C. Moore (admitted *pro hac vice*)
Tel: (214) 999-4150; mmoore@foley.com
One Market Plaza
55 Spear Street Tower, Suite 1900
San Francisco, CA 94105

*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 WJL

Chapter 11

**STIPULATION TO CONTINUE HEARING
ON MOTION FOR RELIEF FROM THE
AUTOMATIC STAY TO PROCEED WITH
STATE COURT LITIGATION AND/OR
ABSTENTION UNDER 28 U.S.C. 1334(C)(1)**

Judge: Hon. William J. Lafferty

Continued Hearing Date:

Date: February 17, 2026

Time: 1:30 p.m.

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

This stipulation (this “Stipulation”) is entered into by and between The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case”), and creditor Emma Macias (the



1 “Movant”). The Debtor and the Movant are referred to herein collectively as the “Parties.” The Parties,
2 by and through their respective counsel of record, hereby stipulate and agree as follows:

3 **RECITALS**

4 A. On January 26, 2026, the Movant filed her *Motion for Relief From the Automatic Stay to*
5 *Proceed With State Court Litigation and/or Abstention Under 28 U.S.C. 1334(c)(1)* [Docket No. 2577]
6 (the “Motion”).

7 B. The Motion was noticed for preliminary hearing on February 11, 2026, pursuant to
8 Bankruptcy Local Rule 4001-1, (the “Preliminary Hearing”).

9 C. The Parties have agreed to continue the Preliminary Hearing to February 17, 2026, at 1:30
10 p.m., concurrent with the Chapter 11 Case status conference scheduled for the same date and time.

11 **STIPULATION**

12 Wherefore, the Parties hereby stipulate and agree as follows, subject to approval of the Court:

13 1. The Preliminary Hearing on the Motion shall be continued to February 17, 2026, at
14 1:30 p.m.

15 2. The Parties request that the Court enter an order in the form attached hereto as **Exhibit A**
16 approving this Stipulation and continuing the Preliminary Hearing.

17 [Signatures on following page]
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

1 **FOLEY & LARDNER LLP**

2 Eileen R. Ridley (CA Bar No. 151735)
3 Tel: (415) 438-6469; eridley@foley.com
4 Shane J. Moses (CA Bar No. 250533)
5 Tel: (415) 438-6404; smoses@foley.com
6 Ann Marie Uetz (admitted *pro hac vice*)
7 Tel: (313) 234-7114; auetz@foley.com
8 Matthew D. Lee (admitted *pro hac vice*)
9 Tel: (608) 258-4203; mdlee@foley.com
10 Geoffrey S. Goodman (admitted *pro hac vice*)
11 Tel: (312) 832-4515; ggoodman@foley.com
12 Mark C. Moore (admitted *pro hac vice*)
13 Tel: (214) 999-4150; mmoore@foley.com
14 One Market Plaza
15 55 Spear Street Tower, Suite 1900
16 San Francisco, CA 94105

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

19 **UNITED STATES BANKRUPTCY COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **OAKLAND DIVISION**

22 In re:
23 THE ROMAN CATHOLIC BISHOP OF
24 OAKLAND, a California corporation sole,
25
26 Debtor.

27 Case No. 23-40523 WJL
28 Chapter 11

**[PROPOSED] ORDER APPROVING
STIPULATION TO CONTINUE HEARING
ON MOTION FOR RELIEF FROM THE
AUTOMATIC STAY TO PROCEED WITH
STATE COURT LITIGATION AND/OR
ABSTENTION UNDER 28 U.S.C. 1334(C)(1)**

Judge: Hon. William J. Lafferty

29 The Court having reviewed the *Stipulation to Continue Hearing on Motion for Relief From the*
30 *Automatic Stay to Proceed With State Court Litigation and/or Abstention Under 28 U.S.C. 1334(c)(1)*
31 [Docket No. •] (the “Stipulation”)¹ entered into between The Roman Catholic Bishop of Oakland, a
32 California corporation sole, and the debtor and debtor in possession (the “Debtor”) in the above-captioned

33 ¹ Terms defined in the Stipulation shall have the same meaning herein.

1 chapter 11 bankruptcy case (the “Chapter 11 Case”), and creditor Emma Macias (the “Movant” and
2 together with the Debtor, the “Parties”); and after due consideration and good cause appearing,

3 **IT IS HEREBY ORDERED THAT:**

4 1. The Stipulation is approved.

5 2. The Preliminary Hearing on the Movant’s *Motion for Relief From the Automatic Stay to*
6 *Proceed With State Court Litigation and/or Abstention Under 28 U.S.C. 1334(c)(1)* [Docket No. 2577] is
7 hereby continued to Tuesday, February 17, at 1:30 p.m.

8 3. This Court shall retain jurisdiction with respect to all matters arising from or related to the
9 implementation and/or interpretation of this Order.

10 **END OF ORDER**

COURT SERVICE LIST

All ECF Recipients.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

ORDER APPROVING STIPULATION TO CONTINUE HEARING