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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

**DEBTOR'S STATEMENT FOR APRIL 1,
2026 STATUS CONFERENCE**

Judge: Hon. William J. Lafferty

Date: April 1, 2026
Time: 9:00 a.m.
Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

1 This status conference statement (this "Statement") is filed by The Roman Catholic Bishop of
2 Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor") in the
3 above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case") in advance of the status conference
4 schedule for April 1, 2026 (the "Status Conference") the Debtor requested of the Court regarding
5 participation by the Debtor's insurers in the mandatory settlement conference ("MSC") ordered by Judge
6 Chatterjee in the first to proceed in state court of the six cases for which this Court previously entered an
7 order lifting the automatic stay.

8 On March 13, 2026, Judge Chatterjee issued an Order Setting Mandatory Settlement Conference,
9 scheduling the same for March 30, 2026 before Judge Colwell as settlement judge in Department 301 in
10 the state court. **Ex. A.** As the Debtor advised this Court at a recent status conference, the Debtor provided
11 notice of this to all its insurers and thus made no objection to each participating in the MSC. The Debtor
12 also advised this Court that Plaintiff Woodall (through his counsel Rick Simons) has taken the position he
13 will only settle the Woodall case if all of the other cases related to the same perpetrator also settle – this
14 is 61 cases in total. Three insurers filed in the state court action statements relating to the MSC, including
15 their position in substance that this Court only lifted the automatic stay as to 6 cases and not as to all 61
16 which are the subject of Mr. Woodall's demand. Therefore, although they technically appeared for the
17 MSC, they refused to participate in the MSC – including a flat refusal to make any offers for fear of being
18 held in contempt by this Court for violation of the stay (the remaining insurers also took this position at
19 the MSC).

20 The Debtor agrees this Court only lifted the automatic stay as to 6 cases – and not as to the entire
21 pool of 61 cases which Mr. Simons included in his settlement demand as part of the MSC. Notwithstanding
22 this, counsel for the Debtor appeared at the March 30th MSC prepared to negotiate settlement of either the
23 Woodall case individually or the 61 referenced cases collectively. The MSC ended quickly on March 30th
24 because Plaintiff Woodall would not consider negotiating a settlement of only his individual claim, and
25 the insurers would not consider negotiating a settlement of the 61 cases collectively.

26 The Debtor wants to be clear it does not object to the insurers participating in the MSC, including
27 as to negotiations relating to the subject 61 referenced cases. The Debtor expressly reserves, and does not
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DEBTOR'S STATEMENT FOR APRIL 1, 2026 STATUS CONFERENCE

1 waive, its rights under Section 362(a)(3) of the Bankruptcy Code with respect to all cases for which this
2 Court has not ordered the automatic stay be lifted. But for clarity, the Debtor does not object to
3 participating in the MSC as to the other 60 referenced cases, nor does the Debtor object to its insurers
4 participating in the MSC as to the other 60 referenced cases. In fact, a further MSC session before the
5 April 13 trial date for the Woodall case may lead to significant progress.

6 Finally, the Debtor rejects any suggestion by any insurer that the formal mediation in this Chapter
7 11 Case is ongoing. Even the mediators have confirmed that mediation has for all intents and purposes
8 concluded. The Debtor has made clear to this Court its belief that no further progress will be made as part
9 of the formal mediation in this Chapter 11 Case. Nonetheless, the Debtor continues to remain willing to
10 negotiate settlement issues with any parties, including in the MSC, and directly with the Committee,
11 individual state court counsel, and/or the Insurers.

12 Importantly, on a parallel path, the Debtor will steadfastly pursue confirmation of its Fourth
13 Amended Plan of Reorganization.

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16 DATED: March 31, 2026

Respectfully submitted,

17 **FOLEY & LARDNER LLP**

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Shane J. Moses

Ann Marie Uetz

Matthew D. Lee

Geoffrey S. Goodman

Mark C. Moore

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21 /s/ Shane J. Moses

22 Counsel for the Debtor
23 and Debtor in Possession
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DEBTOR'S STATEMENT FOR APRIL 1, 2026 STATUS CONFERENCE

EXHIBIT A

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA

George E. McDonald Hall of Justice

Jon Doe OK 1022
Plaintiff/Petitioner(s)
VS.
THE ROMAN CATHOLIC
BISHOP OF OAKLAND, A
Corporation Sole et al
Defendant/Respondent
(s)

No. HG19048685
Date: 03/13/2026
Time: 11:00 AM
Dept: 301
Judge: S. Raj Chatterjee

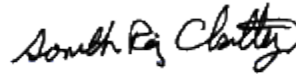
ORDER Setting Mandatory
Settlement Conference

Mandatory Settlement Conference (MSC) is scheduled for 03/30/2026 at 09:00 AM in Department 301 at George E. McDonald Hall of Justice.


No statements are required since they have been here before.

Clerk is directed to serve copies of this order, with proof of service, to counsel and to self-represented parties of record.

Dated : 03/13/2026



S. Raj Chatterjee / Judge

SUPERIOR COURT OF CALIFORNIA COUNTY OF ALAMEDA	Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Rene C. Davidson Courthouse 1225 Fallon Street, Oakland, CA 94612	FILED Superior Court of California County of Alameda 03/13/2026
PLAINTIFF/PETITIONER: Jon Doe OK 1022	Chad Finke, Executive Officer / Clerk of the Court By:  Deputy B. Mercado
DEFENDANT/RESPONDENT: THE ROMAN CATHOLIC BISHOP OF OAKLAND, A Corporation Sole et al	
CERTIFICATE OF ELECTRONIC SERVICE CODE OF CIVIL PROCEDURE 1010.6	CASE NUMBER: HG19048685

I, the below named Executive Officer/Clerk of Court of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served one copy of the Order Setting Mandatory Settlement Conference entered herein upon each party or counsel of record in the above entitled action, by electronically serving the document(s) from my place of business, in accordance with standard court practices.

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Chad Finke, Executive Officer / Clerk of the Court

Dated: 03/13/2026

By:



B. Mercado, Deputy Clerk