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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

**NOTICE REGARDING SUBMISSION OF
PROPOSED CONFIRMATION
SCHEDULING ORDER**

Judge: Hon. William J. Lafferty

1 The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor
2 in possession (the “Debtor” or “RCBO”) in the above-captioned chapter 11 bankruptcy case (the “Chapter
3 11 Case” or the “Bankruptcy Case”), hereby files this notice of submission of its proposed *Confirmation*
4 *Scheduling Order* (the “Proposed Order”) following the status conferences held on March 10, 13, 20, and
5 25 (the “Status Conferences”).

6 The Debtor and Committee have reached agreement on the form of Proposed Order attached hereto
7 as **Exhibit A**, reflecting the schedule approved by the Court at the Status Conferences, with certain
8 modifications agreed by the parties. Although the Debtor has met and conferred with the Insurers and
9 accepted certain of their requested revisions, it is the Debtor’s understanding that the Insurers are not
10 willing to approve the Proposed Order in the form attached hereto. The Debtor is concurrently submitting
11 the Proposed Order for entry by the Court and respectfully requests that the Court enter the Proposed
12 Order in the form agreed by the Debtor and the Committee.

13
14 DATED: March 31, 2026

FOLEY & LARDNER LLP

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Shane J. Moses

Ann Marie Uetz

Matthew D. Lee

Geoffrey S. Goodman

Mark C. Moore

/s/ Shane J. Moses

SHANE J. MOSES

*Counsel for the Debtor
and Debtor in Possession*

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NOTICE OF SUBMISSION OF PROPOSED CONFIRMATION SCHEDULING ORDER

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EXHIBIT A

1 **FOLEY & LARDNER LLP**

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10 *Counsel for the Debtor
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12 **UNITED STATES BANKRUPTCY COURT**
13
14 **NORTHERN DISTRICT OF CALIFORNIA**
15
16 **OAKLAND DIVISION**

15 In re:

16 THE ROMAN CATHOLIC BISHOP OF
17 OAKLAND, a California corporation sole,

18 Debtor.

Case No. 23-40523 WJL

Chapter 11

CONFIRMATION SCHEDULING ORDER

1 This matter came before the Court at status conferences on March 13, 20, and 25, 2026 (the “Status
2 Conferences”) regarding proposed scheduling and other matters in connection with consideration of the
3 Debtor Plan and the Committee Plan (as defined below), as well as solicitation of the same.

4 On March 27, 2026, the Debtor served its *Debtor’s Modified Fourth Amended Plan of*
5 *Reorganization Dated March 27, 2026* [filed on March 30, 2026 at Docket No. 2758] (as may be modified
6 from time to time, the “Debtor Plan”).

7 On March 27, 2026, the Committee filed *The Official Committee of Unsecured Creditors’ Plan of*
8 *Reorganization, Dated March 27, 2026* [Docket No. 2752] (as may be modified from time to time, the
9 “Committee Plan”).

10 The Court having considered all filings by the Debtor, the Committee, and other parties-in-interest
11 in connection with the Status Conferences and the statements of counsel at the Status Conferences; and
12 after due deliberation, and good and sufficient cause appearing:

13 **IT IS HEREBY ORDERED** as follows:

14 1. The following schedule (the “Schedule”) will govern dates and deadlines for the events
15 listed below in connection with the proceedings related to solicitation and confirmation of the Debtor Plan
16 and the Committee Plan. All hearing start times and hearing dates not specifically set below will be set by
17 the Court at a later date:

Category	Event	Deadline
Fact Discovery		
	Deadline to Serve Written Discovery (excluding requests to admit)	April 6, 2026
	Deadline to Serve Written Responses to Discovery	April 13, 2026
	Deadline of Disclosure of Fact Witnesses	April 16, 2026
	Deadline for Substantial Completion of Document Production	April 20, 2026
	Deadline to Complete Supplemental Fact Discovery	April 30, 2026
	Exchange Deposition Designations	June 4, 2026
	Exchange Deposition Counter-designations	June 9, 2026

28 CONFIRMATION SCHEDULING ORDER

Category	Event	Deadline
Expert Discovery		
	Affirmative Expert Reports due (including Amended Affirmative Expert Reports)	May 7, 2026
	Rebuttal Expert Reports due	May 21, 2026
	Deadline to Complete Expert Depositions	May 28, 2026
	Deadline to file Declarations constituting Direct Testimony of all witnesses (fact and expert)	June 5, 2026 or minus 10 days from confirmation hearing
Motion Practice		
	Discovery Motions Due	May 14, 2026
	Responses to Discovery Motions Due (no replies to Discovery Motions)	May 21, 2026
	Hearing on Discovery Motions	TBD
	Deadline to file <i>Daubert</i> Motions and in <i>Limine</i> Motions	June 4, 2026
	Responses to <i>Daubert</i> Motions and in <i>Limine</i> Motions Due (no replies)	June 9, 2026
	Hearing on Motions in <i>Limine</i> and <i>Daubert</i>	Week of June 8, 2026
Plan Confirmation		
	Deadline for Committee to file Executive Summary/DS	March 27, 2026
	Deadline for Parties to File Responses to Executive Summaries	April 7, 2026 at 3:00 p.m. PDT
	Hearing on form of notice of Confirmation Hearing / DS Approval Hearing	April 10, 2026 at 8:00 a.m. PDT
	Deadline to File Plan Supplements	April 29, 2026
	Deadline to File Proposed Confirmation Orders	April 29, 2026
	Plan Objection Deadline	May 8, 2026
	Draft Pretrial Order prepared by Debtor to be circulated to Committee	May 27, 2026
	Deadline to supplement confirmation objections with information derived from expert depositions and/or discovery that was not, and reasonably could not have been, known prior to the completion of such depositions and/or discovery.	June 1, 2026
	Voting Deadline	June 4, 2026

Category	Event	Deadline
	Briefs in Support of Confirmation Due	June 5, 2026 or minus 10 days from confirmation hearing
	Deadline to submit Joint Pretrial Order and Witness and Exhibit Lists	June 8, 2026 or minus 7 days from confirmation hearing
	Pretrial Conference	Week of June 8, 2026
	Commencement of Confirmation Hearing	Week of June 15, 2026
	Post-Hearing Briefs	15 days after conclusion of confirmation hearing
	Anticipated Effective Date	July 28, 2026

2. All parties-in-interest must comply with the Schedule.

3. Nothing in this Order shall preclude any party from supplementing, and all parties reserve the right to supplement, written discovery requests based on the information learned from initial discovery responses.

4. The Deadlines may be amended only by mutual agreement of the parties and approval of the Court, or upon good cause shown after notice and a hearing. Nothing in this Order shall preclude any party-in-interest from seeking to adjourn the deadlines set forth in the Schedule for good cause shown, or any other party-in-interest from opposing such request. Parties must make reasonable efforts to meet and confer regarding any change to the dates set forth in the Schedule prior to seeking Court intervention.

5. Nothing in this order shall preclude any party from seeking a determination from the Court that either the Debtor Plan or the Committee Plan is patently unconfirmable and should not be solicited, or otherwise should not proceed forward, on that basis.

6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

*** END OF ORDER ***

APPROVED AS TO FORM:

LOWENSTEIN SANDLER LLP

By: /s/ Michael A. Kaplan
Michael A. Kaplan

Attorneys for the Official Committee of Unsecured Creditors

CONFIRMATION SCHEDULING ORDER

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CONFIRMATION SCHEDULING ORDER