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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

**DECLARATION OF MATTHEW K.
BABCOCK IN SUPPORT OF OMNIBUS
OBJECTION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS TO AMENDED,
DUPLICATIVE, AND LATE-FILED
CLAIMS**

Judge: Hon. William J. Lafferty
Date: May 20, 2026
Time: 10:30 a.m.
Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612



1 I, Matthew K. Babcock, hereby declare as follows pursuant to 28 U.S.C. § 1746:

2 1. I am a managing director at Berkeley Research Group, LLC, the financial advisor to the
3 Official Committee of Unsecured Creditors (the "Committee") of The Roman Catholic Bishop of
4 Oakland appointed in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case").

5 2. I submit this Declaration¹ for all permissible purposes under the Federal Rules of
6 Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence
7 in support of the *Omnibus Objection of the Official Committee of Unsecured Creditors to Certain*
8 *Amended, Duplicative, and Late Filed Claims* (the "Objection"). I have read the Objection, and
9 am directly, or by and through the Committee's professionals, familiar with the information
10 contained therein and in the Proposed Order submitted therewith.

11 3. The Committee's professionals, and I personally, have reviewed each of the proofs of
12 claim that are the subject of the Objection, and other publicly available information. Such claims
13 were carefully reviewed and analyzed in good faith utilizing due diligence by the appropriate
14 professionals.

15 4. In connection with the Committee's claims review process, and in coordination with
16 Committee counsel, I or, at my direction, my designees have determined that the claims identified
17 in the Objection are objectionable for the reasons set forth in the Objection, including that they
18 have been amended and superseded, that they are duplicative of another filed claim, or that they
19 were filed after the applicable deadline to file claims set forth in the Bar Date Order.

20 5. Accordingly, to prevent the claimants from receiving an unwarranted recovery to the
21 detriment of holders of allowed claims, I believe that the Proposed Order disallowing the claims
22 identified therein should be entered.

23 **A. Amended Claims**

24 6. The proofs of claim identified in section A of the Objection have been amended and
25 superseded by subsequently filed proofs of claim. The updated claims (the "Remaining Claims")
26 are identified by claim number in the "Remaining Claim" column set forth in the Objection. The

27 _____
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection (as defined herein).

1 earlier-filed proofs of claim listed in the “Amended Claim to be Disallowed” column in the
2 Objection (the “Amended Claims”) thus no longer represent valid proofs of claim against the
3 estate.²

4 7. Failure to object to the Amended Claims listed in the “Amended Claims to be
5 Disallowed” column could result in the applicable claimants receiving multiple recoveries against
6 the estate, to the detriment of similarly situated creditors. Elimination of the Amended Claims will
7 enable Verita Global to maintain a more accurate claims register. Each of the affected claimants’
8 Remaining Claims will remain on the Claims Register, subject to the terms described more fully
9 in the Objection.

10 **B. Duplicative Claims**

11 8. The proofs of claim identified in the “Duplicative Claim to be Disallowed” column in
12 section B of the Objection (the “Duplicative Claims”) are duplicative of other proofs of claim (the
13 “Remaining Claims”) identified in the “Remaining Claim” column in the Objection. Committee
14 counsel reviewed the Claims Register and identified potential duplicative claims. Based on a
15 review of the proofs of claim, many of the Duplicative Claims appear to be exact copies of the
16 same claim that was filed two separate ways (e.g., mailed and submitted electronically).

17 9. Where a claim appeared to be an exact duplicate, but submitted two separate ways (e.g.,
18 mailed and submitted electronically), such claims were generally categorized with the
19 electronically submitted claim as the “Remaining Claim,” because of the additional information
20 included therein regarding receipt of such claim. To the extent claims were generally duplicative
21 of one another and one of those claims contained additional supporting information, the claim with
22 additional supporting information was categorized as the “Remaining Claim”. Where there were
23 no clear differences in the additional information provided in support of duplicative claims, the
24 earlier-filed claim was generally identified as the Duplicative Claim for disallowance.

25
26
27 ² As identified in the Objection, Claim No. 163 filed by Salesian College Preparatory (dated September 5, 2023)
28 indicates that it amends an earlier filed claim by Marc Colelli. Marc Colelli filed Claim No. 177 (dated September 5,
2023). Both claims contain the same backup information and both claims were signed by Marc Colelli in his capacity
as Chief Financial Officer of Salesian College Preparatory.

