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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

**DECLARATION OF SHANE J. MOSES IN  
SUPPORT OF 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]

I, Shane J. Moses, hereby declare as follows:

1. I am an attorney admitted to practice in the States of California and New York, and before this Bankruptcy Court. I am of counsel with the law firm of Foley & Lardner LLP (“Foley”) and am one of the attorneys at Foley responsible for representation of the Roman Catholic Bishop of Oakland (“the Debtor”) in this Bankruptcy Case.



1           2.       I make this Declaration in support of the *Application for Order Shortening Time for Notice*  
2 *of Hearing on Debtor’s Renewed Motion for Entry of an Order Approving Sale of Real Property (1822*  
3 *San Antonio Avenue)* [Docket No. 2588], filed concurrently herewith (the “Application”).<sup>1</sup>

4           3.       By the Application, the Debtor requests an order shortening time for notice on its *Debtor’s*  
5 *Renewed Motion for Entry of an Order Approving Sale of Real Property (1822 San Antonio Avenue)*  
6 [Docket No. 2584], filed on January 28, 2025 (the “Motion”).

7           4.       By the Motion, the Debtor requests authority to sell a single-family residence located at  
8 1822 San Antonio Avenue, in Alameda, California (the “1822 House”), as further set forth therein.

9           5.       As set forth in the Sale Contract, a copy of which is attached to the Declaration of Attila  
10 Bardos filed in support of the Motion [Docket No. 2585] provides for close of escrow not later than 10  
11 days after acceptance, which would be February 6, 2026. Not obtaining entry of an order prior to this date  
12 could jeopardize the sale and the approximately \$1.1 million it will generate for the Debtor’s estate.  
13 Further, the Debtor urgently needs the proceeds of sale to pay administrative expenses. Both of the  
14 foregoing reasons require a hearing on shortened notice.

15           6.       There were no objections to the Prior Motion for sale of the 1822 House, which sought  
16 substantially the same relief, except that the current motion has different Buyers and somewhat higher  
17 purchase price. Prior to withdrawal of the Prior Motion, counsel for the Committee confirmed that the  
18 Committee did not object to the relief requested in the Prior Motion.

19           7.       On the evening of Wednesday, January 28, 2026, I emailed attorneys for the Committee  
20 Brent Weisenberg and Jeffrey Prol, informing them of the new sale contract and the Motion, and  
21 requesting consent for shortening of time to have the Motion heard on February 4, 2026.

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

24           I declare under penalty of perjury under the laws of the United States of America that the foregoing  
25 is true and correct to the best of my information, knowledge, and belief.

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application or the Motion, as appropriate.

1 Executed on January 26, 2026, in Oakland California.

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3 /s/ Shane J. Moses  
4 Shane J. Moses

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