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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 WJL

Chapter 11

**STIPULATION TO EXTEND TIME FOR  
PROFESSIONALS TO FILE INTERIM FEE  
APPLICATIONS**

Judge: Hon. William J. Lafferty

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”), the Official Committee of Unsecured Creditors appointed in the Chapter 11 Case (the “Committee”), and David M. Klauer (the “Fee Examiner”). The Debtor, the Committee and the Fee Examiner are referred to herein collectively as



1 the “Parties.” The Parties, by and through their respective counsel of record, hereby stipulate and agree as  
2 follows:

3 **RECITALS**

4 A. On June 23, 2023, the Court entered the *Order Authorizing Procedures for Interim*  
5 *Compensation and Reimbursement of Expenses of Professionals* [Docket No. 170] (the “Original  
6 Compensation Procedures Order”).

7 A. The Court entered its *Agreed Order Amending Procedures for Interim Compensation and*  
8 *Reimbursement of Expenses of Professionals* on June 27, 2025 [Dkt. No. 2101] (the “Amended  
9 Compensation Procedures Order” and collectively with the Original Compensation Procedures Order, the  
10 “Compensation Procedures Orders”).<sup>1</sup>

11 B. Pursuant to the Compensation Procedures Orders, Professionals must file their Interim Fee  
12 Applications no later than 45 days after the end of the Interim Fee Period (the “Interim Application Filing  
13 Date”).

14 C. The Interim Fee Period that will be included in the next Interim Fee Application is  
15 September 1, 2025 through December 31, 2025. The Interim Application Filing Date for this Interim Fee  
16 Application is February 16, 2026.

17 D. The Parties have agreed to extend the Interim Application Filing Date to February 24, 2026.

18 **STIPULATION**

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

20 1. Professionals must file their Interim Fee Applications no later than February 24, 2026.

21 2. The Parties request that the Court enter an order in the form attached hereto as **Exhibit A**  
22 approving this Stipulation and extending the filing deadline of the Interim Fee Applications.

23 [Signatures on following page]

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28 <sup>1</sup> Capitalized terms not defined herein shall have the meaning given to them in the Compensation Procedures Order.

1 **SO STIPULATED:**

2 Dated: February 6, 2026

FOLEY & LARDNER LLP

3  
4 /s/ Shane J. Moses

Shane J. Moses

5 Attorneys for Debtor

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7 **SO STIPULATED:**

8 Dated: February 6, 2026

LOWENSTEIN SANDLER LLP

9 /s/ Gabrielle L. Albert

10 Gabrielle L. Albert

11 Attorneys for the  
12 Official Committee of Unsecured Creditors

13  
14 **SO STIPULATED:**

15 Dated: February 6, 2026

DAVID M. KLAUDER

16 /s/ David M. Klauder

17 David M. Klauder

18 Fee Examiner

# EXHIBIT A

1 **FOLEY & LARDNER LLP**

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

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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**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

**[PROPOSED] ORDER APPROVING  
STIPULATION TO EXTEND TIME FOR  
PROFESSIONALS TO FILE INTERIM FEE  
APPLICATIONS**

Judge: Hon. William J. Lafferty

The Court having reviewed the *Stipulation to Extend Time for Case Professionals to File Interim Fee Applications* [Docket No. •] (the “Stipulation”)<sup>1</sup> entered into between defendants 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”), the Official

<sup>1</sup> Terms defined in the Stipulation shall have the same meaning herein.

1 Committee of Unsecured Creditors appointed in the Chapter 11 Case (the “Committee”) and David M.  
2 Klauder (the “Fee Examiner” and together with the Debtor and the Committee, the “Parties”); and after  
3 due consideration and good cause appearing,

4 **IT IS HEREBY ORDERED THAT:**

- 5 1. The Stipulation is approved.
- 6 2. Professionals must file their Interim Fee Applications no later than February 24, 2026.
- 7 3. This Court shall retain jurisdiction with respect to all matters arising from or related to the  
8 implementation and/or interpretation of this Order.

9 \*\*END OF ORDER\*\*

**COURT SERVICE LIST**

All ECF Recipients.

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ORDER REGARDING EXTENSION OF TIME FOR PROFESSIONALS TO FILE INTERIM FEE APPLICATIONS