

LOWENSTEIN SANDLER LLP
Jeffrey D. Prol (admitted *pro hac vice*)
Brent Weisenberg (admitted *pro hac vice*)
One Lowenstein Drive
Roseland, NJ 07068
Tel: (973) 597-2500
Email: jprol@lowenstein.com
Email: bweisenberg@lowenstein.com

BURNS BAIR LLP
Timothy W. Burns (admitted *pro hac vice*)
Jesse J. Bair (admitted *pro hac vice*)
10 East Doty Street, Suite 600
Madison, WI 53703-3392
Tel: (608) 286-2808
Email: tburns@burnsbair.com
Email: jbair@burnsbair.com

KELLER BENVENUTTI KIM LLP
Gabrielle L. Albert #190895
425 Market Street, 26th Floor
San Francisco, CA 94105
Tel: (415) 496-6723
Email: galbert@kbkllp.com

*Special Insurance Counsel for Official
Committee of Unsecured Creditors*

*Attorneys for Official Committee of
Unsecured Creditors*

**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

**THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' STATEMENT
IN ADVANCE OF MARCH 20, 2026 STATUS
CONFERENCE**

Judge: Hon. William J. Lafferty

Date: March 20, 2026

Time: 8:00 a.m. PT

Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

1 This status conference statement (this “Statement”) is filed by The Official Committee of
2 Unsecured Creditors (the “Committee”) of the Roman Catholic Bishop of Oakland, a California
3 corporation sole, and the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter
4 11 bankruptcy case (the “Chapter 11 Case”) in advance of the status conference regarding plan
5 confirmation scheduled for March 20, 2026 (the “Status Conference”).

6 On February 20, 2026, the Debtor filed the *Notice of Filing of Debtor’s Fourth Amended Plan of*
7 *Reorganization* [Docket No. 2654], with the *Debtor’s Fourth Amended Plan of Reorganization, Dated*
8 *February 20, 2026* (the “Debtor Plan”) attached thereto as Exhibit 2.

9 On March 6, 2026, the Committee filed the *Notice of Filing of the Official Committee of Unsecured*
10 *Creditors’ Plan of Reorganization, Dated March 6, 2026* [Docket No. 2705], with *The Official Committee*
11 *of Unsecured Creditors’ Plan of Reorganization, Dated March 6* (the “Committee Plan”), attached thereto
12 as Exhibit A.

13 The Debtor and the Committee met and conferred on March 16, March 18, and March 19 regarding
14 a schedule in connection with the Debtor Plan and Committee Plan, based on a confirmation hearing
15 concluding on or before June 30, 2026. The Parties have conditionally reached agreement on all dates
16 and deadlines, as reflected on the schedule attached hereto as **Exhibit A** (the “Proposed Confirmation
17 Schedule”). The Parties propose calendar weeks rather than specific dates for motion hearings, pre-
18 confirmation hearings, and the commencement of the confirmation hearing, and ask the Court to set
19 hearings during those weeks as its calendar allows.

20 However, the Proposed Confirmation Schedule assumes that there is resolution of the adversary
21 proceeding captioned *The Official Committee of Unsecured Creditors of the Roman Catholic Bishop of*
22 *Oakland v. The Roman Catholic Bishop of Oakland (In re: The Roman Catholic Bishop of Oakland)*, Adv.
23 Pro. No. 24-04051 (Bankr. N.D. Cal.) (the “Restricted Assets Adversary Proceeding”), in advance of, or
24 in conjunction with, the hearing on confirmation of the Debtor Plan and the Committee Plan. But the
25 Debtor and the Committee agree that the Restricted Assets Adversary Proceeding will not be ready to be
26 tried between now and June 30. Therefore, unless the Debtor and Committee can agree upon a stipulation
27 with respect to the impact of the Restricted Assets Adversary Proceeding on confirmation of the Debtor
28 Plan and the Committee Plan, it will be prejudicial to the Committee’s positions on feasibility of the

1 Debtor Plan and the Committee Plan to proceed with a trial on confirmation of the Plans in advance of
2 resolution of the Restricted Assets Adversary Proceeding.

3 Whether certain of the Debtor's assets are restricted, as the Debtor asserts, has a material impact
4 on whether the Debtor Plan is fair and equitable. If a meaningful portion of the alleged restricted assets
5 are unrestricted, it necessarily follows that the proposed distribution to survivors of sexual abuse under
6 the Debtor Plan is neither fair nor equitable because those assets are not being contributed to fund
7 distributions to Survivors. Similarly, if a substantial portion of the allegedly restricted assets are not
8 restricted, they will be available to fund distributions under the Committee Plan.

9 The Committee remains willing to meet and confer with the Debtor in advance of the Status
10 Conference to seek a stipulation on this issue but may need the Court's guidance if a resolution is not
11 reached.

12 Dated: March 19, 2026

LOWENSTEIN SANDLER LLP
BURNS BAIR LLP
KELLER BENVENUTTI KIM LLP

14 By: /s/ Gabrielle L. Albert
15 Tobias S. Keller
16 Jane Kim
17 Gabrielle L. Albert

18 - and -

19 Jeffrey D. Prol
20 Brent Weisenberg

21 - and -

22 Timothy W. Burns
23 Jesse J. Bair

24 *Counsel for the Official Committee of*
25 *Unsecured Creditors*
26
27
28

EXHIBIT A

Category	Event	Proposed Deadlines Agreed by the Debtor and the Committee (Assuming Contemporaneous Resolution of Restricted Adversary Complaint)
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
Expert Discovery		
	Amended Affirmative Expert Reports due	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	June 4, 2026
	Responses to <i>Daubert</i> Motions Due (no replies)	June 9, 2026
	Hearing on <i>Daubert</i> Motions	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 2, 2026
	Hearing on form of notice of Confirmation Hearing / DS Approval Hearing	Week of April 6, 2026
	Plan Objection Deadline	May 1, 2026
	Draft Pretrial Order prepared by Debtor to be circulated to Committee	May 27, 2026
	Voting Deadline	June 4, 2026
	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