

**FOLEY & LARDNER LLP**

Eileen R. Ridley (CA Bar No. 151735)  
Tel: (415) 438-6469; [eridley@foley.com](mailto:eridley@foley.com)  
Shane J. Moses (CA Bar No. 250533)  
Tel: (415) 438-6404; [smoses@foley.com](mailto:smoses@foley.com)  
Ann Marie Uetz (admitted *pro hac vice*)  
Tel: (313) 234-7114; [auetz@foley.com](mailto:auetz@foley.com)  
Matthew D. Lee (admitted *pro hac vice*)  
Tel: (608) 258-4203; [mdlee@foley.com](mailto:mdlee@foley.com)  
Geoffrey S. Goodman (admitted *pro hac vice*)  
Tel: (312) 832-4515; [ggoodman@foley.com](mailto:ggoodman@foley.com)  
Mark C. Moore (admitted *pro hac vice*)  
Tel: (214) 999-4150; [mmoore@foley.com](mailto:mmoore@foley.com)  
One Market Plaza  
55 Spear Street Tower, Suite 1900  
San Francisco, CA 94105

*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

**DEBTOR’S MOTION FOR AN ORDER  
(I) APPROVING CLAIM OBJECTION  
PROCEDURES, (II) APPROVING CLAIM  
HEARING PROCEDURES, AND  
(III) GRANTING RELATED RELIEF**

Judge: Hon. William J. Lafferty

Date: TBD

Time: TBD

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

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”), hereby files this *Motion for an Order (I) Approving Claim Objection Procedures,*  
4 *(II) Approving Claim Hearing Procedures, and (III) Granting Related Relief* (the “Motion”) pursuant to  
5 sections 105, 363 and 502 of the United States Code (the “Bankruptcy Code”), for entry of an order  
6 approving procedures by which the Debtor may file objections to proofs of claim that have been filed or  
7 scheduled in the Chapter 11 Case and resolve any responses that may be received to those objections.

8           This Motion is based on the Memorandum of Points and Authorities set forth herein, the notice of  
9 hearing on the Motion, the Declaration of Mark C. Moore (the “Moore Declaration”) filed concurrently  
10 herewith in support of the Motion, and such other evidence, oral or documentary, as may be presented to  
11 this Court at or prior to the hearing on this Motion.

12           The Debtor’s proposed order granting the requested relief is attached hereto as **Exhibit A** (the  
13 “Proposed Order”).

**Table of Contents**

I. PRELIMINARY STATEMENT ..... 1

II. JURISDICTION AND VENUE..... 1

III. BACKGROUND..... 1

IV. THE CLAIMS PROCESS.....2

V. RELIEF REQUESTED .....4

VI. ARGUMENTS AND AUTHORITIES .....5

    A. The Claim Procedures.....5

    B. The Claims Hearing Procedures .....8

    C. The Claims Objection Procedures are Appropriate and Should be Approved ..... 10

    D. The Claims Hearing Procedures Are Appropriate and Should be Approved ..... 11

VII. CONCLUSION ..... 13

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## Table of Authorities

Page(s)

### Cases

<i>Ashford v. Consolidated Pioneer Mort (In re Consol Pioneer Mortg.)</i> , 178 B.R. 222 (9th Cir. B.A.P. 1995).....	12
<i>Bessette v. Avco Financial Svs., Inc.</i> , 230 F.3d 439 (1st Cir. 2000).....	10
<i>Chinichian v. Campolongo (In re Chinichian)</i> , 784 F.2d 1440 (9th Cir. 1986) .....	10, 11
<i>Comm. of Equity Sec. Holders v. Lionel Corp. (In re Lionel Corp.)</i> , 722 F.2d 1063 (2d Cir. 1983) .....	10
<i>In re Allegheny Int’l, Inc.</i> , 954 F.2d 167 (3d Cir. 1992) .....	12
<i>Landis v. North American Co.</i> , 299 U.S. 248 (1936).....	11
<i>Link v. Wabash R. Co.</i> , 370 U.S. 626 (1962).....	11

### Statutes

11 U.S.C. §§ 105, 363 and 502 .....	1, 4, 10, 11
11 U.S.C. § 105(a) .....	10, 11
11 U.S.C. § 502(a) .....	5
11 U.S.C. §§ 1107(a) and 1108.....	1
11 U.S.C. § 1111(a) .....	5
28 U.S.C. § 157(b) .....	1
28 U.S.C. §§ 157 and 1334 .....	1
28 U.S.C. §§ 1408 and 1409 .....	1

### Rules

FED. R. BANKR. P. 1001 .....	10
FED. R. BANKR. P. 2002, 3007, 9006, 9014 and 9019 .....	1, 4
FED. R. BANKR. P. 3007 .....	5, 7, 10, 11
FED. R. BANKR. P. 3007(a)(2) .....	7
FED. R. BANKR. P. 3007(c) .....	5, 10
FED. R. BANKR. P. 3007(d).....	5, 6
FED. R. BANKR. P. 3007(e)(1)–(2) .....	7
FED. R. BANKR. P. 7012(b).....	12
FED. R. BANKR. P. 9014(c); 7012(b).....	11
FED. R. CIV. P. 12(b)(6) .....	11
FED. R. CIV. P. 12(c) .....	11

1 **MEMORANDUM OF POINT AND AUTHORITIES**

2 **I.**

3 **PRELIMINARY STATEMENT**

4 The Debtor seeks to establish claim objection procedures that allow the Debtor to efficiently  
5 dispose of claims that are legally insufficient. Indeed, the Debtor and its professionals have been  
6 methodically reviewing and analyzing all filed claims, including Sexual Abuse Claims. With respect to  
7 Sexual Abuse Claims, the Debtor does not seek to defeat or disprove any allegations of Abuse made  
8 against it or any accused individual, but rather to determine (a) whether the filed Sexual Abuse Claims  
9 complied with the Bar Date Order and applicable Bankruptcy Rules and/or (b) whether the Sexual Abuse  
10 Claims provided sufficient information to determine whether the Debtor was or could be liable for the  
11 alleged abuse. The Debtor has already filed an omnibus claim objection with respect to the former, and  
12 seeks to use these procedures on any future claim objections regarding the same. As to the latter—the  
13 Debtor’s liability—the Debtor believes that the procedures herein set forth an efficient process that  
14 preserves resources for victims with lawful claims.

15 **II.**

16 **JURISDICTION AND VENUE**

17 This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is  
18 a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this District pursuant  
19 to 28 U.S.C. §§ 1408 and 1409. The statutory bases for this Motion are sections 105, 363 and 502 of  
20 chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002, 3007, 9006,  
21 9014 and 9019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

22 **III.**

23 **BACKGROUND**

24 On May 8, 2023 (the “Petition Date”), the Debtor caused its attorneys to file a voluntary petition  
25 for chapter 11 bankruptcy relief under the Bankruptcy Code. The Debtor continues to operate its ministry  
26 and manage its properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy  
27 Code. No trustee has been appointed in this Chapter 11 Case.

1 On May 23, 2023, the U.S. Trustee appointed the Official Committee of Unsecured Creditors (the  
2 “Committee”).

3 The Debtor is a corporation sole organized under the laws of the State of California. The Debtor  
4 conducts its civil affairs under the laws of the State of California and the United States of America and in  
5 accordance with the Code of Canon Law, the ecclesiastical law of the Roman Catholic Church. Additional  
6 information regarding the Debtor, its mission, ministries, and operations, and the events and circumstances  
7 preceding the Petition Date, is set forth in the *Declaration of Charles Moore, Managing Director of*  
8 *Alvarez & Marsal North America, LLC, Proposed Restructuring Advisor to the Roman Catholic Bishop*  
9 *of Oakland, in Support of Chapter 11 Petition and First Day Pleadings* (the “First Day Declaration”)  
10 [Docket No. 19], which is incorporated herein by reference. Further information regarding the Debtor and  
11 the Chapter 11 Case is found in the Debtor’s *Third Amended Disclosure Statement* filed on April 3, 2025  
12 [Docket No. 1874], the *Executive Summary, Frequently Asked Questions, and General Information*  
13 *Regarding Debtor’s Fourth Amended Plan of Reorganization* filed on February 20, 2027 [Docket No.  
14 2654-1], and the *Disclosure Statement in Support of the Debtor’s Modified Fourth Amended Plan of*  
15 *Reorganization* filed on March 29, 2026 [Docket No. 2759].

#### 16 IV.

#### 17 THE CLAIMS PROCESS

18 On May 22, 2023, the Debtor filed its schedules of assets and liabilities and statements of financial  
19 affairs [Docket Nos. 54, 55].

20 On June 27, 2023, the Debtor filed the *Motion of the Debtor for an Order Establishing Deadlines*  
21 *for Filing Proofs of Claim and Granting Related Relief* [Docket No. 181] seeking to establish September  
22 11, 2023, as the deadline for filing all non-governmental proofs of claim.

23 On July 25, 2023, the Court entered the *Order Establishing Deadlines for Filing Proofs of Claim*  
24 *and Approving the Form and Manner of Notice Thereof* [Docket No. 293] (the “Bar Date Order”). Under  
25 the Bar Date Order, the Court set (a) September 11, 2023 at 5:00 p.m. (prevailing Pacific Time) as the  
26 deadline for each person or entity to file a proof of claim in the Debtor’s Chapter 11 Case (the “General  
27 Bar Date”), and (b) November 6, 2023 at 5:00 p.m. (prevailing Pacific Time) as the deadline for  
28

MOTION TO APPROVE CLAIM OBJECTION  
AND HEARING PROCEDURES

1 governmental units to file a proof of claim in the Debtor’s Chapter 11 Case (the “Governmental Bar  
2 Date”).

3 The Bar Date Order also, among other things: (1) approved the form of the *Notice of Deadline*  
4 *Requiring Filing of Proofs of Claim Arising out of Sexual Abuse* [Docket 285, Ex. 2] (the “Sexual Abuse  
5 Bar Date Notice”), which provided, among other things, (a) notice to the Sexual Abuse Claimants that all  
6 Sexual Abuse Claims<sup>1</sup> must be filed by the General Bar Date and (b) notice to Sexual Abuse Claimants  
7 regarding the option to complete the *Optional Supplement to Official Form 410 for Use by Sexual Abuse*  
8 *Claimants* (the “Supplement”) to be submitted with the Official Proof of Claim Form; (2) approved the  
9 form of Supplement to be used; and (3) proscribed strict Confidentiality Protocols<sup>2</sup> and other protections  
10 related to the information contained in both the proofs of claim ultimately filed and the optional  
11 Supplements completed and submitted in connection therewith. Specifically, with respect to the  
12 Supplement, the Sexual Bar Date Notice provided:

13  
14 You may, **but are not required to**, complete the enclosed “*Optional Supplement to Official*  
15 *Form 410 for Use by Sexual Abuse Claimants*” (the “Supplement”) and submit it with your  
completed Official Proof of Claim Form.

16 While you are **not** required to complete and file the Supplement to assert a claim against  
17 the Debtor, **the Committee strongly recommends that any person asserting a sexual abuse claim**  
18 **fill out the Supplement in full and submit it with the Official Proof of Claim Form.**

19 To date, the claims register, prepared and maintained by Kurtzman Carson Consultants, LLC dba  
20 Verita Global, shows that over 500 claims have been filed in this Chapter 11 Case. Of the total claims  
21 reflected in the claims register, there are 431 Sexual Abuse Claims, with 380 supplements (approximately  
22 88%) filed in support.

23 Throughout this Chapter 11 Case, the Debtor and its professionals have been methodically  
24 reviewing and analyzing all filed claims, including Sexual Abuse Claims. The goal was not to eliminate  
25 claims; rather, the goal was to determine (a) whether the filed Sexual Abuse Claims complied with the  
26

27 <sup>1</sup> “Sexual Abuse Claimants” and “Sexual Abuse Claim” have the same meaning as the term is defined in the Bar Date Order.

28 <sup>2</sup> “Confidentiality Protocol” shall have the same meaning as the term is defined in the Bar Date Order.

1 Bar Date Order and applicable Bankruptcy Rules and/or (b) whether the Sexual Abuse Claims provided  
2 sufficient information to determine whether the Debtor was or could be liable for the alleged abuse. With  
3 respect to the latter, the Debtor and its professionals looked at whether each Sexual Abuse Claim provided  
4 the (i) the victim's name, (ii) the timing of the alleged abuse, (ii) the identity of the alleged perpetrator,  
5 and (iii) the location of where the alleged abuse took place. From there, the Debtor was able to identify  
6 certain Sexual Abuse Claims that either did not provide enough information for the Debtor to determine  
7 its liability or the information provided demonstrates the Debtor is not liable.

8 The Debtor's goal throughout this Chapter 11 Case has been to ensure that all Sexual Abuse Claims  
9 are treated fair and equitably in the Plan. This means that all claims, including Sexual Abuse Claims, that  
10 fail to provide sufficient information to establish liability or provide information that establishes that the  
11 Debtor is not liable should not be allowed in order to provide a greater distribution to those allowed Sexual  
12 Abuse Claims. As such, the proposed claim objection procedures provide a mechanism for the Debtor to  
13 efficiently dispose of claims that are legally insufficient. In light of the limited resources available in the  
14 Debtor's bankruptcy, the Debtor is focused on an efficient process that preserves resources for victims  
15 with lawful claims.

16 In addition to this Motion, the Debtor has filed its *First Omnibus Objection to Certain Amended,*  
17 *Duplicated, and Late Filed Claims*, seeking an order disallowing proof of claims that (i) were filed after  
18 the General Bar Date (without leave of Court), (ii) are amended from prior timely filed proof of claims,  
19 or (iii) are duplicates of other claims. For the avoidance of doubt, that objection is not subject to the  
20 procedures contemplated in the Motion.

21 **V.**

22 **RELIEF REQUESTED**

23 By this Motion, and pursuant to sections 105, 363 and 502 of the Bankruptcy Code and Bankruptcy  
24 Rules 2002, 3007, 9006, and 9014, and Local Rule 3007-1, the Debtor, after notice and a hearing, seeks  
25 entry of an order (a) approving procedures by which the Debtor may (i) file objections to proofs of claim  
26 that have been filed and/or scheduled in this Chapter 11 Case and (ii) resolve any responses that may be  
27 received to those objections (the "Claim Objection Procedures"); (b) granting relief from certain  
28

MOTION TO APPROVE CLAIM OBJECTION  
AND HEARING PROCEDURES

1 limitations of Bankruptcy Rule 3007 and Local Rule 3007-1, as specified below; and (c) approving certain  
2 hearing procedures in connection with any claim objection (omnibus or individual).

3 **VI.**

4 **ARGUMENTS AND AUTHORITIES**

5 Under the Bankruptcy Code and Bankruptcy Rules, (a) each proof of claim will be allowed as  
6 filed, unless an objection is filed in response to the proof of claim or an objection to the proof of claim is  
7 otherwise settled; and (b) each liquidated scheduled claim will be allowed as scheduled, unless an  
8 objection is filed thereto, the Debtor amends its schedules to modify the liquidated scheduled claim, or  
9 the liquidated scheduled claim is otherwise settled. In particular, section 502(a) of the Bankruptcy Code  
10 provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed  
11 allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). In addition, under section 1111(a) of  
12 the Bankruptcy Code, liquidated scheduled claims are treated as filed proofs of claim. *See* 11 U.S.C. §  
13 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears  
14 in the schedules . . . except a claim . . . that is scheduled as disputed, contingent or unliquidated.”).  
15 Accordingly, the Debtor must review for possible objection or resolution all proofs of claim and liquidated  
16 scheduled claims to determine whether they should be allowed as filed or scheduled.

17 **A. The Claim Procedures**

18 Bankruptcy Rule 3007 allows for a procedure by which a debtor may assert objections to multiple  
19 claims in an “omnibus objection.”<sup>3</sup> Rule 3007(c) allows for a court order to provide for the filing of an  
20 omnibus objection on grounds other than those listed in Rule 3007(d). *See* FED. R. BANKR. P. 3007(c)  
21 (“Unless otherwise ordered by the court or permitted by subdivision (d), objections to more than one claim  
22 shall not be joined in a single objection.”). And Rule 3007(d), in turn, permits an omnibus objection when  
23 the claims in question:

- 24 (a) duplicate other claims;

25  
26  
27 <sup>3</sup> The Bankruptcy Local Rules for the Northern District of California do not establish guidelines for the filing of Omnibus  
28 Claim Objections.

- 1 (b) have been filed in the wrong case;
- 2 (c) have been amended by subsequently filed proofs of claim;
- 3 (d) were not timely filed;
- 4 (e) have been satisfied or released during the case in accordance with the Code,  
5 applicable rules, or a court order;
- 6 (f) were presented in a form that does not comply with applicable rules, and the  
7 objection states that the objector is unable to determine the validity of the claim  
8 because of the noncompliance;
- 9 (g) are interests, rather than claims; or
- 10 (h) assert priority in an amount that exceeds the maximum amount under §507 of the  
11 Code.

12 FED. R. BANKR. P. 3007(d).

13 In addition to the foregoing grounds, the Debtor anticipates that, it will also object to grounds not  
14 set forth in Bankruptcy Rule 3007(d). For example, the Debtor anticipates objecting to claims that have  
15 already been paid and released, predate the Debtor's existence, do not relate to the Debtor, or otherwise  
16 are not supported by the Debtor's books and records. Preparing and filing multiple separate, individual  
17 objections to proof of claims on such grounds would be time consuming, expensive, threatens to  
18 unnecessarily clog the Court's docket with numerous additional pleadings, and would place additional  
19 burdens on the Debtor and other parties in interest. Moreover, the impact of the resulting delays and costs  
20 could be substantial in this case considering the large number of claims and the estate's limited resources.  
21 Conversely, permitting the Debtor to make objections to proofs of claims in an omnibus fashion will  
22 conserve judicial resources while reducing the administrative and financial burden on the Debtor's estate.  
23 Accordingly, the Debtor requests that, in addition to the grounds enumerated in Bankruptcy Rule 3007(d),  
24 it be permitted to file a single objection to no more than 100 claims at a time (the "Omnibus Claims  
25 Objection") seeking to reduction, reclassification, or disallowance of claims based on the following  
26 additional grounds (collectively, the "Additional Permitted Grounds"):

- 27
- the claim does not include sufficient information to ascertain the validity of such claim;
  - the claim seeks recovery for which the Debtor is not liable;
- 28

MOTION TO APPROVE CLAIM OBJECTION  
AND HEARING PROCEDURES

- the claim has been previously paid or settled prior to or during this Chapter 11 Case;
- the claim is not supported by the Debtor's books and records.<sup>4</sup>

Bankruptcy Rule 3007 requires that an objecting party serve a copy of the claim objection with notice of a hearing on affected claimants. *See* FED. R. BANKR. P. 3007(a)(2). It also requires omnibus claim objections disclose the name or identity of each claimant. *See* FED. R. BANKR. P. 3007(e)(1)–(2). Local Rule 3007-1 further provides that all claim objections attach a copy of the claim unless the Court orders otherwise. *See* Local Rule 3007-1(a).

*First*, in effort to reduce service costs and enable claimants to more readily identify an objection to their claims, the Debtor proposes to serve a notice of the Omnibus Claims Objection, rather than the entire Omnibus Claims Objection, on each of the claimants whose claims are the subject of the applicable Omnibus Claims Objection and, if known, their counsel. The proposed notice (the “Claim Objection Notice”) would be in a form substantially similar to the notice attached to the Proposed Order as Exhibit

1.<sup>5</sup> With respect to Omnibus Claim Objections directed at Sexual Abuse Claims, the Debtor will include with the Claim Objection Notice a copy of that victim's filed proof of claim(s) subject to the objection. All Claim Objection Notices will explain the claim objection process, identify the claim that is subject to the objection, describe the basis for the objection, and supply information to the claimant regarding the response deadline and hearing date. For the avoidance of doubt, at no time will any Sexual Abuse Claim (or the information contained therein) be shared with any party other than the claimant and/or its counsel, except in compliance with the confidentiality procedures approved in the Bar Date Order. As to all other Omnibus Claim Objections (i.e., not Sexual Abuse Claims), the Claim Objection Notice will inform the claimant that a full copy of the claim objection will be available (i) electronically on the Court's website (with a PACER login and password), (ii) from the Debtor's claims and noticing agent, Kurtzman Carson

---

<sup>4</sup> For the avoidance of doubt, the Debtor intends to use the Claim Objection Procedures for Sexual Abuse Claims only to object such claims that are plainly improper as a matter of law. For example, the Debtor intends to object to claims: (i) when the claimant entered into a prepetition settlement release with the Diocese, (ii) the claimant's Sexual Abuse Claim is barred by the statute of limitations, (iii) the alleged abuse took place before the Diocese existed, *e.g.*, before 1962, and (iv) that alleged liability on account of abuse that allegedly occurred at locations the Diocese has no affiliation with, and/or was allegedly perpetrated by individuals that the Diocese did not supervise.

<sup>5</sup> The proposed Claim Objection Notice attached hereto is for illustrative purposes only and will be modified to account for the nature of each Omnibus Claims Objection.

1 Consultants, LLC dba Verita Global, at <https://veritaglobal.net/rcbo>, or (iii) by calling a designated  
2 telephone number to request a hard copy Toll Free #: (888) 733-1425; Non-U.S. #: +1 (310) 751-2631.

3 **Second**, the Debtor requests the authority to file Omnibus Claim Objections without attaching the  
4 filed proof of claims, and specifically for objections directed at Sexual Abuse Claims the authority to  
5 identify each victim by their claim number. The Debtor proposes to send a copy of the victim's proof of  
6 claim(s) with the Claim Objection Notice, the Debtor believes that each Sexual Abuse Claimant will  
7 receive sufficient notice of the objection. Due to the highly sensitive and confidential nature of the Sexual  
8 Abuse Claims, the Debtor believes this process necessary to maintain the confidentiality of Sexual Abuse  
9 Claimants' personal information, and to comply with the Confidentiality Protocol contained in the Bar  
10 Date Order.

11 In sum, the Debtor believes that the proposed Claim Objection Procedures will reduce service  
12 costs and will help claimants easily identify their claims that are subject to an objection. They also protect  
13 the privacy and confidentiality of individuals who have asserted Sexual Abuse Claims while providing  
14 every claimant with the information necessary to understand and respond to any claim objection. And in  
15 light of the limited resources available in this Chapter 11 Case, the Debtor is focused on ensuring that  
16 such resources are preserved for survivors whose claims are not "plainly improper as a matter of law."  
17 The Debtor is taking this step to assure that none of its scarce resources are spent on legally defective  
18 claims. These Claim Objection Procedures have been carefully designed to provide survivors with options  
19 and to preserve resources for their benefit. The Debtor believes that these procedures are in the best  
20 interests of a timely and efficient resolution for survivors, the Diocese, and its mission.

21 Accordingly, the Debtor requests that the Court approve the Debtor's use of the Claim Objection  
22 Procedures.

23 **B. The Claims Hearing Procedures**

24 The Debtor's limited resources would be heavily-taxed if they attempted to reconcile and resolve  
25 the hundreds of claims that have filed in this Chapter 11 Case using traditional claims reconciliation  
26 procedures (particularly, full-scale evidentiary hearings). The Debtor, therefore, seeks to implement  
27 certain claims hearing procedures (the "Claims Hearing Procedures") that have been approved in other  
28

1 chapter 11 cases to ease the burden and costs of the reconciliation process. The Claims Hearing Procedures  
2 would facilitate consensual resolutions where possible and expedite the resolution of disputes where  
3 necessary, all while respecting the due process rights of the claimants, the Debtor, and all other parties in  
4 interest. The key features of the proposed Claim Hearing Procedures are as followed:

- 5 (a) Following the Debtors' objection (omnibus or otherwise) to a claim, a Claimant  
6 will have an opportunity to file and serve a Response. If the Claimant does not  
7 properly respond, the Debtors will seek to have the claim disallowed, reduced,  
8 reclassified, or expunged (or to have any other requested relief granted) at the  
9 hearing scheduled for the objection's return date.
- 10 (b) The hearing to consider a claim objection as to which a Response is properly filed  
11 and served (each, a "Contested Claim") shall be set for a contested hearing (each,  
12 a "Claim Hearing") to be scheduled by the Debtor, in its discretion, as set forth  
13 herein. The Debtor shall schedule a Claim Hearing for a Contested Claim as  
14 follows:
- 15 (i) For a non-evidentiary hearing to address whether the Contested Claim has  
16 failed to state a claim against the Debtor which can be allowed and should  
17 be dismissed pursuant to Bankruptcy Rule 7012(b) (a "Sufficiency  
18 Hearing"). The legal standard of review at a Sufficiency Hearing will be  
19 equivalent to that applied upon a motion to dismiss for failure to state a  
20 claim upon which relief can be granted. The Debtors may also voluntarily  
21 proceed to a Merits Hearing (defined below) by serving the relevant  
22 Claimant (by email or overnight delivery), and filing with the Court, a  
23 notice scheduling a Merits Hearing (a "Notice of Merits Hearing") at least  
24 thirty (30) days prior to the date of such Merits Hearing.
- 25 (ii) For an evidentiary hearing on the merits of a Contested Claim (a "Merits  
26 Hearing"), the Debtor, in its discretion, may serve upon the relevant  
27 Claimant (by email or overnight delivery) and file with the Court, a notice  
28 that the hearing will be a Merits Hearing (a "Notice of Merits Hearing") at  
least thirty (30) calendar days prior to the date of such Merits Hearing. The  
rules and procedures applicable to such Merits Hearing will be set forth in  
any scheduling order issued by the Court in connection therewith. The  
Notice of Merits Hearing may have an offer of settlement appended.
- (iii) In advance of a Claim Hearing (Sufficiency and/or Merits Hearing), the  
Debtor and the Claimant shall meet and confer with respect to the  
appropriate confidentiality procedures, if any, that shall govern the hearing  
on the matter.
- (c) Discovery with respect to a Contested Claim will not be permitted until either (a)  
the Court has held a Sufficiency Hearing and determined that the Contested Claim  
states a claim that could be allowed and should not be dismissed pursuant to  
Bankruptcy Rule 7012, (b) the Debtor has served the relevant Claimant a Notice of  
Merits Hearing with respect to the Contested Claim, or (c) further Court order.

1           **C. The Claims Objection Procedures are Appropriate and Should be Approved**

2           Approving and establishing the Claim Objection Procedures is well within this Court’s authority.  
3 Bankruptcy Rule 3007(c) provides that this Court may modify that Rule’s limitations on omnibus claim  
4 objections. *See* FED. R. BANKR. P. 3007(c) (providing that the Rule’s “[l]imitation on joinder of claims  
5 objections” applies “[u]nless otherwise ordered by the court”). In addition, section 105(a) of the  
6 Bankruptcy Code provides, in pertinent part, that a bankruptcy court may “issue any order, process, or  
7 judgment that is necessary or appropriate to carry out the provisions [of the Bankruptcy Code] . . . .” 11  
8 U.S.C. § 105(a). Under section 105(a) of the Bankruptcy Code, the Court has expansive equitable power  
9 to fashion any order or decree that is in the interest of preserving or protecting the value of a debtor’s  
10 assets. *See, e.g., Chinichian v. Campolongo (In re Chinichian)*, 784 F.2d 1440, 1443 (9th Cir. 1986)  
11 (“Section 105 sets out the power of the bankruptcy court to fashion orders as necessary pursuant to the  
12 purposes of the Bankruptcy Code.”) (citations omitted); *Comm. of Equity Sec. Holders v. Lionel Corp. (In*  
13 *re Lionel Corp.)*, 722 F.2d 1063, 1069 (2d Cir. 1983) (“[A] bankruptcy judge must have substantial  
14 freedom to tailor his orders to meet differing circumstances.”); *Bessette v. Avco Financial Svs., Inc.*, 230  
15 F.3d 439, 445 (1st Cir. 2000) (“[A] court may invoke § 105(a) if the equitable remedy utilized is  
16 demonstrably necessary to preserve a right elsewhere provided in the Code”) (citations omitted).

17           Moreover, granting the relief requested here is an appropriate use of the Court’s discretion under  
18 Bankruptcy Rule 3007(c) and equitable power under section 105(a) of the Bankruptcy Code, because the  
19 proposed modifications comport not only with Bankruptcy Rule 3007 itself—which provides for due  
20 process in asserting and resolving claim objections as well as for efficient and cost-sensitive  
21 administration of large bankruptcy cases—but also with the spirit of the Bankruptcy Rules generally. *See*  
22 FED. R. BANKR. P. 1001 (providing that the Bankruptcy Rules “shall be construed to secure the just,  
23 speedy, and inexpensive determination of every case and proceeding”).

24           In accordance with these standards, and for the reasons set out in this motion, the Debtor submits  
25 that approving and establishing the Claim Objection Procedures will provide for a timely, cost-effective  
26 and efficient claims-administration process. Among other things, the requested relief will: (a) provide  
27 greater certainty in administering the Claim Objections process, while also streamlining it; (b) maintain  
28

1 the confidentiality of sensitive information involved in this case; (c) minimize the expense, delay and  
2 uncertainty in the claims process in these cases, which, in turn, will help conserve the resources of the  
3 Court and the Debtor’s estate; and (d) preserve the due process protections of claimants.

4 **D. The Claims Hearing Procedures Are Appropriate and Should be Approved**

5 There is ample support for the Claims Hearing Procedures in the Bankruptcy Code and Bankruptcy  
6 Rules. Under section 105(a) of the Bankruptcy Code, the Court has expansive equitable power to fashion  
7 any order or decree that is in the interest of preserving or protecting the value of a debtor’s assets. *See* 11  
8 U.S.C. § 105(a) (providing, in pertinent part, that a bankruptcy court may “issue any order, process, or  
9 judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].”);  
10 *Chinichian*, 784 F.2d at 1443 (“Section 105 sets out the power of the bankruptcy court to fashion orders  
11 as necessary pursuant to the purposes of the Bankruptcy Code.”). Moreover, the Court has the “inherent  
12 power” to “manage [its] owns affairs so as to achieve the orderly and expeditious disposition of cases.”  
13 *Cf. Link v. Wabash R. Co.*, 370 U.S. 626, 630-31 (1962); *Landis v. North American Co.*, 299 U.S. 248,  
14 254 (1936) (noting the “power inherent in every court to control the disposition of the causes on its docket  
15 with economy of time and effort for itself, for counsel, and for litigants”).

16 The primary feature of the Claims Hearing Procedures—the use of a Sufficiency Hearing—is  
17 consistent with the Bankruptcy Rules, which permit bankruptcy courts to hold a summary hearing to rule  
18 on the sufficiency of pleadings in support of claims. As a procedural matter, the Debtor’s objection,  
19 omnibus or otherwise, to a claim initiates a contested matter, which is governed by Bankruptcy Rule 9014.  
20 *See* 1983 Advisory Committee Note to Fed. R. Bankr. P. 3007, reprinted in 9 Collier on Bankr. App. 3007  
21 (15th ed. rev. 2009) (a “contested matter initiated by an objection to a claim is governed by rule 9014”).  
22 Bankruptcy Rule 9014(c), in turn, specifically authorizes bankruptcy courts to implement the formal rules  
23 used in adversary proceedings for claims objections—including Bankruptcy Rule 7012(b), which  
24 incorporates Federal Rule of Civil Procedure 12(b)(6) (dismissal for failure to state a claim) and Rule  
25 12(c) (judgment on the pleadings). *See* FED. R. BANKR. P. 9014(c); 7012(b). Under these rules, the  
26 bankruptcy court is authorized to hold a summary hearing and to rule on claims where a claimant has  
27 failed to make a prima facie case against the Debtor. Although a “proof of claim is deemed prima facie  
28

1 valid” under Bankruptcy Rule 3001(f), the claimant still must provide sufficient support its claim to make  
2 out a prima facie case against the Debtor. *See, e.g., Ashford v. Consolidated Pioneer Mort (In re Consol*  
3 *Pioneer Mortg.)*, 178 B.R. 222, 226 (9th Cir. B.A.P. 1995) (“Initially, the claimant must allege facts  
4 sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is  
5 ‘prima facie’ valid.”) (quoting *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173-174 (3d Cir. 1992)). Where  
6 the claimant fails to do so, the claim is appropriately disallowed pursuant to Bankruptcy Rule 7012(b).  
7 Sufficiency Hearings comport with these rules and the Court’s inherent power to manage its own affairs  
8 so as to achieve the orderly and expeditious disposition of these chapter 11 cases. Because the Sufficiency  
9 Hearings contemplate judgment on the pleadings, the lack of an evidentiary hearing will expedite the  
10 disposition of claims that fail to state a claim against the Debtor which can be allowed.

11 The relief requested with respect to Sufficiency Hearings is substantially similar to the relief that  
12 has been granted by other bankruptcy courts in other large chapter 11 cases. *See, e.g., In re Roman Catholic*  
13 *Diocese of Rockville Centre, New York*, Case No. 20-12345 (MG) (Bankr. S.D.N.Y. Jan. 10, 2023)  
14 [Docket No. 1554] (approving claims hearing procedures that incorporated a sufficiency hearing); *In re*  
15 *The Great Atl. & Pac. Tea Co., Inc.*, Case No. 15-23007 (RDD) (Bankr. S.D.N.Y. Mar. 22, 2016) (ECF  
16 No. 2613) (same); *In re MF Global Inc.*, Case No. 11-2790 (MG) (Bankr. S.D.N.Y. Oct. 10, 2013) (same);  
17 *In re Lehman Brothers Holdings Inc.*, Case No. 08-13555 (JMP) (Bankr. S.D.N.Y. Apr. 19, 2010) (ECF  
18 No. 8474) (same); *In re Delphi Corp., et al.*, Case No. 05-44481 (RDD) (Bankr. S.D.N.Y. Dec. 6, 2006)  
19 (ECF No. 6089) (implementing claims hearing procedures for all claims); *see also In re GT Advance*  
20 *Techs., Inc.*, Case No. 14-11916 (HJB) (Bankr. D.N.H. Aug. 24, 2015) (implementing specific procedures  
21 for omnibus claim objections).

22 Accordingly, the Debtor submits that approving the Claims Hearing Procedures will provide for a  
23 timely, cost-effective and efficient claims-administration process.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**VII.**  
**CONCLUSION**

WHEREFORE, the Debtor respectfully requests that the Court enter the Proposed Order and grant such other and further relief as may be just and proper.

DATED: April 2, 2026

**FOLEY & LARDNER LLP**

Eileen R. Ridley  
Shane J. Moses  
Ann Marie Uetz  
Matthew D. Lee  
Mark C. Moore

*/s/ Shane J. Moses*

\_\_\_\_\_  
Shane J. Moses

*Counsel for the Debtor  
and Debtor in Possession*

# **EXHIBIT A**

1 **FOLEY & LARDNER LLP**

2 Eileen R. Ridley (CA Bar No. 151735)  
3 Tel: (415) 438-6469; [eridley@foley.com](mailto:eridley@foley.com)  
4 Shane J. Moses (CA Bar No. 250533)  
5 Tel: (415) 438-6404; [smoses@foley.com](mailto:smoses@foley.com)  
6 Ann Marie Uetz (admitted *pro hac vice*)  
7 Tel: (313) 234-7114; [auetz@foley.com](mailto:auetz@foley.com)  
8 Matthew D. Lee (admitted *pro hac vice*)  
9 Tel: (608) 258-4203; [mdlee@foley.com](mailto:mdlee@foley.com)  
10 Geoffrey S. Goodman (admitted *pro hac vice*)  
11 Tel: (312) 832-4515; [ggoodman@foley.com](mailto:ggoodman@foley.com)  
12 Mark C. Moore (admitted *pro hac vice*)  
13 Tel: (214) 999-4150; [mmoore@foley.com](mailto:mmoore@foley.com)  
14 One Market Plaza  
15 55 Spear Street Tower, Suite 1900  
16 San Francisco, CA 94105

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

19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
**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 (I) APPROVING  
CLAIM OBJECTION PROCEDURES, (II)  
APPROVING CLAIM HEARING  
PROCEDURES, AND (III) GRANTING  
RELATED RELIEF**

Judge: Hon. William J. Lafferty

The Court having reviewed the *Motion for an Order (I) Approving Claim Objection Procedures, (II) Approving Claim Hearing Procedures, and (III) Granting Related Relief* [Docket No. •] filed on April [•], 2026 (the “Motion”),<sup>1</sup> by 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”) and after due consideration and good cause appearing,

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

1           **IT IS HEREBY ORDERED THAT:**

2           1.       The Motion is granted as set forth herein.

3           2.       The Claim Objection Procedures and Claim Hearing Procedures set forth below are hereby  
4 approved and established in all respects pursuant to sections 105 and 502 of the Bankruptcy Code and  
5 Bankruptcy Rules 2002, 3007, 9006, and 9014.

6           3.       The Debtor are authorized to object to claims in accordance with the following procedures  
7 (the “Claim Objection Procedures”):

8           (a)       Notwithstanding anything to the contrary in Bankruptcy Rule 3007, the Debtors  
9 and other parties in interest are authorized to file Omnibus Objections to claims  
10 seeking reduction, reclassification, or disallowance of claims on one or more of the  
11 following grounds (the “Additional Permitted Grounds” and together with those  
12 grounds set forth in Bankruptcy Rule 3007(d), the “Permitted Grounds”):

13           (i)       the claim does not include sufficient information to ascertain the validity of  
14 such claim;

15           (ii)       the claim seeks recovery for which the Debtor is not liable;

16           (iii)       the claim has been previously paid or settled prior to or during this Chapter  
17 11 Case;

18           (iv)       the claim is not supported by the Debtor’s books and records

19           (b)       The Debtor is authorized to file Omnibus Objections to no more than one hundred (100)  
20 claims at a time on the Permitted Grounds.

21           (c)       Except as expressly provided herein, the Debtor shall comply with the requirements  
22 for Omnibus Claims Objections set forth in Bankruptcy Rule 3007(e); *provided* that  
23 any objections directed at Sexual Abuse Claims shall comply with the Confidentiality  
24 Protocols set forth in the Bar Date Order.

25           (d)       For any objections directed at Sexual Abuse Claims, the Debtor is authorized to  
26 identify such claims only by Claim Number and take all necessary steps to ensure any  
27 filed objections and notices related thereto comply with the Confidentiality Protocols  
28 set forth in the Bar Date Order.

          (e)       Objections, individual or omnibus, do not need to include copies of the filed proof of  
          claims.

          (f)       The Debtor is authorized to serve, or cause to be served, a Claim Objection Notice,  
          rather than the entire Omnibus Claim Objection, on each claimant whose claim is  
          the subject of the applicable omnibus claim objection and, if known, its counsel.  
          The Claim Objection Notice shall be in a form substantially similar to the notice  
          attached hereto as **Exhibit 1**, and shall include an explanation of the claim objection  
          process, a description of the basis of the omnibus claim objection, information  
          regarding the response deadline and hearing date, information on the Claims

ORDER APPROVING CLAIM OBJECTION  
AND HEARING PROCEDURES

1 Hearing Procedures (as described herein), identification of the claim that is the  
2 subject of the omnibus claim objection (with reference to an attached exhibit or  
3 otherwise), and information on how the claimant might obtain a complete copy of  
4 the omnibus objection. For objections directed at Sexual Abuse Claims, the Claim  
5 Objection Notice shall include a copy of the victim's filed proof of claim. The  
6 Debtor retains the right to serve Omnibus Claim Objections in their entirety in  
7 appropriate circumstances as determined in the Debtor's sole discretion.

8 (g) Notice of claim objections shall be limited to: (a) service of a complete copy of  
9 each claim objection (whether an omnibus objection or an individual objection) on  
10 the U.S. Trustee and by email to counsel for the Committee; (b) with respect to  
11 Omnibus Claims Objections, service of a Claim Objection Notice (and copy of the  
12 filed proof of claim, if applicable) on the claimant whose claim is the subject of the  
13 applicable omnibus claim objection and its counsel, if known; and (c) with respect  
14 to individual claim objections, service of a complete copy of each individual  
15 objection on the claimant whose claim is the subject of the applicable individual  
16 claim objection and its counsel, if known, or, where counsel has appeared for a  
17 claimant, a complete copy of each individual objection to a claim on the claimant's  
18 counsel by email. In addition, a complete copy of each omnibus and individual  
19 claim objection will be filed with this Court and publicly available on the Court's  
20 electronic docket, PACER, and the Case Website.

21 (h) An objection, whether included in an omnibus objection or filed individually, shall  
22 not prejudice any party's ability to raise additional objections to that claim on other  
23 grounds, future objections to other proofs of claim on the same grounds, or future  
24 omnibus objections on the same grounds. For the avoidance of doubt, the filing of  
25 a legal objection to a proof of claim shall not prejudice any party's ability to pursue  
26 related fact-based objections at a later date.

27 (i) Bankruptcy Rule 3007(f), which provides that the "finality of any order regarding  
28 a claim objection included in an omnibus objection shall be determined as though  
the claim had been subject to an individual objection," shall apply to the omnibus  
claim objections authorized herein.

4. Responses to the Debtor's individual and omnibus claim objections shall be due thirty (30)  
calendar days after service of the objection; *provided*, that the Debtor reserves the right to request that the  
Court impose an alternative response date or grant expedited consideration with respect to certain  
objections, if the circumstances so require, which may result in shortened notice of both the hearing date  
and the response deadline. If a claim objection is asserted against any Sexual Abuse Claims, any  
corresponding Responses and Replies (and any attachments thereto) may be filed under seal without  
further order of the Court.

5. The following claims hearing procedures (the "Claims Hearing Procedures") shall apply:

(a) Following the Debtors' objection (omnibus or otherwise) to a claim, a Claimant  
will have an opportunity to file and serve a Response. If the Claimant does not  
properly respond, the Debtors will seek to have the claim disallowed, reduced,

ORDER APPROVING CLAIM OBJECTION  
AND HEARING PROCEDURES

1 reclassified, or expunged (or to have any other requested relief granted) at the  
2 hearing scheduled for the objection's return date.

3 (b) The hearing to consider a claim objection as to which a Response is properly filed  
4 and served (each, a "Contested Claim") shall be set for a contested hearing (each,  
5 a "Claim Hearing") to be scheduled by the Debtor, in its discretion, as set forth  
6 herein. The Debtor shall schedule a Claim Hearing for a Contested Claim as  
7 follows:

8 (i) For a non-evidentiary hearing to address whether the Contested Claim has  
9 failed to state a claim against the Debtor which can be allowed and should  
10 be dismissed pursuant to Bankruptcy Rule 7012(b) (a "Sufficiency  
11 Hearing"). The legal standard of review at a Sufficiency Hearing will be  
12 equivalent to that applied upon a motion to dismiss for failure to state a claim  
13 upon which relief can be granted. The Debtors may also voluntarily proceed to  
14 a Merits Hearing (defined below) by serving the relevant Claimant (by email  
15 or overnight delivery), and filing with the Court, a Notice of Merits Hearing  
16 (defined below) at least thirty (30) days prior to the date of such Merits  
17 Hearing.

18 (ii) For an evidentiary hearing on the merits of a Contested Claim (a "Merits  
19 Hearing"), the Debtor, in its discretion, may serve upon the relevant  
20 Claimant (by email or overnight delivery) and file with the Court, a notice  
21 that the hearing will be a Merits Hearing (a "Notice of Merits Hearing") at  
22 least thirty (30) calendar days prior to the date of such Merits Hearing. The  
23 rules and procedures applicable to such Merits Hearing will be set forth in  
24 any scheduling order issued by the Court in connection therewith. The  
25 Notice of Merits Hearing may have an offer of settlement appended.

26 (iii) In advance of a Claim Hearing (Sufficiency and/or Merits Hearing), the  
27 Debtor and the Claimant shall meet and confer with respect to the  
28 appropriate confidentiality procedures, if any, that shall govern the hearing  
on the matter.

(c) Discovery with respect to a Contested Claim will not be permitted until either (a)  
the Court has held a Sufficiency Hearing and determined that the Contested Claim  
states a claim that could be allowed and should not be dismissed pursuant to  
Bankruptcy Rule 7012, (b) the Debtor has served the relevant Claimant a Notice of  
Merits Hearing with respect to the Contested Claim, or (c) further Court order.

6. This Order shall not obligate or require the Debtor to settle any claim that it does not  
consider, in its sole discretion, appropriate to compromise and settle, nor any claim in amounts in excess  
of what the Debtor, in its sole discretion, believes to be reasonable and appropriate.

7. The Debtor is hereby authorized to take any and all steps that are necessary or appropriate  
to implement the Claim Objection Procedures and the Claim Hearing Procedures.



**COURT SERVICE LIST**

All ECF Recipients.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

ORDER APPROVING CLAIM OBJECTION  
AND HEARING PROCEDURES

**EXHIBIT 1**

**Claim Objection Notice**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **THIS OBJECTION SEEKS TO REDUCE AND ALLOW OR DISALLOW AND**  
2 **EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING NOTICE OF**  
3 **THIS [OMNIBUS ORDINAL] OBJECTION SHOULD REVIEW THE OBJECTION TO**  
4 **SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OBJECTION**  
5 **AND/OR THE ATTACHED EXHIBIT TO DETERMINE WHETHER THIS OBJECTION**  
6 **AFFECTS THEIR CLAIM(S).**

7 **FOLEY & LARDNER LLP**

8 Eileen R. Ridley (CA Bar No. 151735)  
9 Tel: (415) 438-6469; [eridley@foley.com](mailto:eridley@foley.com)  
10 Shane J. Moses (CA Bar No. 250533)  
11 Tel: (415) 438-6404; [smoses@foley.com](mailto:smoses@foley.com)  
12 Ann Marie Uetz (admitted *pro hac vice*)  
13 Tel: (313) 234-7114; [auetz@foley.com](mailto:auetz@foley.com)  
14 Matthew D. Lee (admitted *pro hac vice*)  
15 Tel: (608) 258-4203; [mdlee@foley.com](mailto:mdlee@foley.com)  
16 Geoffrey S. Goodman (admitted *pro hac vice*)  
17 Tel: (312) 832-4515; [ggoodman@foley.com](mailto:ggoodman@foley.com)  
18 Mark C. Moore (admitted *pro hac vice*)  
19 Tel: (214) 999-4150; [mmoore@foley.com](mailto:mmoore@foley.com)  
20 One Market Plaza  
21 55 Spear Street Tower, Suite 1900  
22 San Francisco, CA 94105

23 *Counsel for the Debtor*  
24 *and Debtor in Possession*

25 **UNITED STATES BANKRUPTCY COURT**  
26 **NORTHERN DISTRICT OF CALIFORNIA**  
27 **OAKLAND DIVISION**

28 In re:  
THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation sole,  
Debtor.

Case No. 23-40523 WJL  
Chapter 11

**NOTICE OF DEBTOR'S [OMNIBUS  
ORDINAL] OBJECTION TO PROOFS OF  
CLAIM [INSERT BASIS FOR OBJECTION]**

Judge: Hon. William J. Lafferty

PLEASE TAKE NOTICE that on [•], 2026, 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”) filed the *Debtor’s [omnibus ordinal] Objection to Proofs of*

1 *Claim* (**[insert basis for objection]**) (the “Objection”) with the United States Bankruptcy Court for the  
2 Northern District of California (the “Bankruptcy Court”).

3 The Objection requests that the Bankruptcy Court expunge, reduce, reclassify, and/or disallow one  
4 or more of your claims listed on **Exhibit A** annexed hereto on the ground that **[insert basis for**  
5 **disallowance, reduction, reclassification or expungement]**. **Any claim that the Bankruptcy Court**  
6 **expunges and disallows will be treated as if it had not been filed and you will not be entitled to any**  
7 **distribution on account thereof.**

8 **PLEASE TAKE FURTHER NOTICE** that if you do NOT oppose the disallowance,  
9 expungement, reduction, or reclassification of your claim(s) listed on **Exhibit A**, then you do NOT need  
10 to file a written response to the Objection and you do NOT need to appear at the hearing.

11 If you DO oppose the disallowance, expungement, reduction, or reclassification of your claim(s)  
12 listed on **Exhibit A**, then you MUST file with the Bankruptcy Court and serve on the parties listed below  
13 a written response to the Objection so that it is received on or before **4:00 p.m., Prevailing Pacific Time**  
14 **on [●], 2026.**

15 Your response, if any, must contain at a minimum the following: (i) a caption setting forth the  
16 name of the Bankruptcy Court, the names of the Debtor, the case number, and the title of the Objection to  
17 which the response is directed; (ii) the name of the claimant and description of the basis for the amount of  
18 the claim; (iii) a concise statement setting forth the reasons why the claim should not be disallowed,  
19 expunged, reduced, or reclassified for the reasons set forth in the Objection, including, but not limited to,  
20 the specific factual and legal bases upon which you will rely in opposing the Objection; (iv) all  
21 documentation or other evidence of the claim, to the extent not included with the proof of claim previously  
22 filed with the Bankruptcy Court, upon which you will rely in opposing the Objection; (v) the address(es)  
23 to which the Debtors must return any reply to your response, if different from that presented in the proof  
24 of claim; and (vi) the name, address, and telephone number of the person (which may be you or your legal  
25 representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the claim on your  
26 behalf. **If you filed a Sexual Abuse Claim, your response, and any attachments, may be filed with**  
27  
28

1 **the Bankruptcy Court under seal.** If you have questions regarding the confidentiality of your response  
2 to this Objection, you should consult with an attorney.

3 The Bankruptcy Court will consider a response only if the response is timely filed, served, and  
4 received. A response will be deemed timely filed, served, and received only if the original response is  
5 actually received on or before the Response Deadline no later than thirty (30) calendar days from the date  
6 of this Notice by the Clerk of the Bankruptcy Court at 1300 Clay Street, Suite 300, Oakland, California  
7 94612.

8 **PLEASE TAKE FURTHER NOTICE THAT** a hearing to consider such Objection and any  
9 responses related thereto (the "Hearing") will be held on [●], 2026 at [●] p.m. (**Prevailing Pacific Time**)  
10 before the Honorable William J. Lafferty, United States Bankruptcy Judge, United States Bankruptcy  
11 Court for the Northern District of California, 1300 Clay Street, Oakland, California 94612. If you file a  
12 written response to the Objection, you should plan to appear at the hearing. The Debtor, however, reserves  
13 the right to continue the hearing on the Objection with respect to your claim(s). If the Debtor does continue  
14 the hearing with respect to your claim(s), then the hearing will be held at a later date. If the Debtor does  
15 not continue the hearing with respect to your claim(s), then a hearing on the Objection will be conducted  
16 on the above date.

17 If the Bankruptcy Court does NOT disallow, expunge, reduce, or reclassify your claim(s) listed on  
18 **Exhibit A** on the grounds set forth above, then the Debtor has the right to object on other grounds to the  
19 claim(s) (or to any other claims you may have filed) at a later date. You will receive a separate notice of  
20 any such objections.

21 **PLEASE TAKE FURTHER NOTICE** that if you wish to view the complete Objection, you can  
22 do so for free at <https://veritaglobal.net/rcbo>. Full copies of each pleading can be viewed or obtained by  
23 accessing the Bankruptcy Court's website at <https://www.canb.uscourts.gov/>.

24 //

25 //

26

27

28

ORDER APPROVING CLAIM OBJECTION  
AND HEARING PROCEDURES

1 DATED: [•], 2026

**FOLEY & LARDNER LLP**

Eileen R. Ridley

Shane J. Moses

Ann Marie Uetz

Matthew D. Lee

Geoffrey S. Goodman

Mark C. Moore

DRAFT

Shane J. Moses

*Counsel for the Debtor*

*and Debtor in Possession*