

**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

**DECLARATION OF MARK C. MOORE IN  
SUPPORT OF DEBTOR'S MOTION FOR  
AN ORDER (I) APPROVING CLAIM  
OBJECTION PROCEDURES, (II)  
APPROVING CLAIM HEARING  
PROCEDURES, AND (III) GRANTING  
RELATED RELIEF**

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

1 I, Mark C. Moore, hereby declare as follows:

2 1. I am an attorney admitted to practice in the State of Texas, and *pro hac vice* before this  
3 Bankruptcy Court in the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case”). I am a  
4 partner with the law firm of Foley & Lardner LLP (“Foley”) and am one of the attorneys at Foley  
5 responsible for representation of the Roman Catholic Bishop of Oakland (“the Debtor”) in this Chapter  
6 11 Case. I make this Declaration in support of *Debtor’s Motion for an Order (I) Approving Claim*  
7 *Objection Procedures, (II) Approving Claim Hearing Procedures, and (III) Granting Related Relief* (the  
8 “Motion”).<sup>1</sup>

9 2. I have personal knowledge of the information contained in this Declaration. I have  
10 personally reviewed the Motion and believe its contents to be true and correct to the best of my knowledge,  
11 information and belief. At various points in time, either I or other professionals at Foley acting at my  
12 direction and under my supervision, have reviewed each and every Sexual Abuse Claim filed with or  
13 otherwise received by the Debtor’s approved claims-and-noticing agent, Verita Global f/k/a Kurtzman  
14 Carson Consultants, LLC (“Verita”).

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

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

20 5. On July 25, 2023, the Court entered the *Order Establishing Deadlines for Filing Proofs of*  
21 *Claim and Approving the Form and Manner of Notice Thereof* [Docket No. 293] (the “Bar Date Order”).  
22 Under the Bar Date Order, the Court set (a) September 11, 2023 at 5:00 p.m. (prevailing Pacific Time) as  
23 the deadline for each person or entity to file a proof of claim in the Debtor’s Chapter 11 Case (the “General  
24 Bar Date”), and (b) November 6, 2023 at 5:00 p.m. (prevailing Pacific Time) as the deadline for  
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28 <sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

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

3 6. The Bar Date Order also, among other things: (1) approved the form of the *Notice of*  
4 *Deadline Requiring Filing of Proofs of Claim Arising out of Sexual Abuse* [Docket 285, Ex. 2] (the "Sexual  
5 Abuse Bar Date Notice"), which provided, among other things, (a) notice to the Sexual Abuse Claimants  
6 that all Sexual Abuse Claims must be filed by the General Bar Date and (b) notice to Sexual Abuse  
7 Claimants regarding the option to complete the *Optional Supplement to Official Form 410 for Use by*  
8 *Sexual Abuse Claimants* (the "Supplement") to be submitted with the Official Proof of Claim Form; (2)  
9 approved the form of Supplement to be used; and (3) proscribed strict Confidentiality Protocols and other  
10 protections 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 **You may, *but are not required to*, complete the enclosed "*Optional Supplement to Official***  
14 ***Form 410 for Use by Sexual Abuse Claimants*" (the "Supplement") and submit it with your**  
15 **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***  
***fill out the Supplement in full and submit it with the Official Proof of Claim Form.***

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

21 8. Throughout this Chapter 11 Case, I and other professionals at Foley, acting under my direct  
22 supervision, have methodically reviewing and analyzing all filed claims, including Sexual Abuse Claims,  
23 the documents submitted therewith, relevant records of the Debtor or that were provided to the Debtor in  
24 the course of state-court litigation, and other publicly available information. At every step, the Debtor's  
25 intent in this review was not to defeat or disprove the allegations contained in any Sexual Abuse Claims;  
26 rather, the goal was to determine (a) whether the filed Sexual Abuse Claims complied with the Bar Date  
27 Order and applicable Bankruptcy Rules and/or (b) whether the Sexual Abuse Claims provided sufficient  
28

DECL. OF M. MOORE ISO MOTION TO APPROVE CLAIM OBJECTION  
AND HEARING PROCEDURES

1 information to determine whether the Debtor was or could be liable for the alleged abuse. With respect to  
2 the latter, I and other professionals at Foley, acting under my direct supervision, looked at whether each  
3 Sexual Abuse Claim provided the (i) the victim's name, (ii) the timing of the alleged abuse, (ii) the identity  
4 of the alleged perpetrator, and (iii) the location of where the alleged abuse took place. From there, we  
5 were able to identify certain Sexual Abuse Claims that either did not provide enough information for the  
6 Debtor to determine its liability or the information provided demonstrates the Debtor is not liable.

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

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

17 Executed on April 2, 2026, at Dallas, Texas.

18  
19 /s/ Mark C. Moore  
20 Mark C. Moore  
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DECL. OF M. MOORE ISO MOTION TO APPROVE CLAIM OBJECTION  
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