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**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 FIRST OMNIBUS OBJECTION
TO CERTAIN AMENDED, DUPLICATED,
AND LATE FILED CLAIMS**

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 *Debtor’s First Omnibus Objection to Certain Amended, Duplicated, and Late*
4 *Filed Claims* (the “Objection”). In further support of the Objection, the Debtor submits the Declaration of
5 Mark C. Moore (the “Moore Declaration”) filed concurrently herewith and incorporated herein, and
6 respectfully states as follows:

7 **I.**

8 **PRELIMINARY STATEMENT**

9 This is the Debtor’s first objection to any Sexual Abuse Claim or Claims in this Chapter 11 Case.
10 The Debtor does not seek to defeat or disprove any allegations of Sexual Abuse made against it or any
11 accused individual. Rather, this Objection targets *only* (i) late-filed claims not subject to Court order
12 allowing them as timely and (ii) claims that are duplicates or amendments of timely filed claims.
13 Sustaining the Objection will increase the recovery for survivors who timely filed their Proofs of Claim,
14 allowing them to receive the benefit of their diligence and not be penalized by late or duplicate filings.
15 The Debtor and its professionals have carefully and thoroughly reviewed the allegations in each Sexual
16 Abuse Claim, including any attached documentation (if any) to ensure that each timely claim is counted
17 only once, accounted for, and preserved in the claims register.

18 As of the filing of this Objection, 431 Sexual Abuse Claims have been filed against the Debtor.
19 Relevant to this Objection, the Debtor and its professionals have identified 44 that should be disallowed
20 and expunged because they either were filed after the General Bar Date (September 11, 2023) without
21 leave of court and/or are duplicates or otherwise superseded or amended by subsequently filed proof of
22 claim.

23 **II.**

24 **JURISDICTION AND VENUE**

25 This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is
26 a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for this matter is proper in this District pursuant
27 to 28 U.S.C. §§ 1408 and 1409. The statutory bases for this Objection are sections 101(5) and 101(10) of
28 chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rules 3007 and 9014 of the

1 Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 3007-1 of the Local Rules for
2 the U.S. Bankruptcy Court for the Northern District of California (the “Local Rules”).

3 **III.**

4 **BACKGROUND**

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

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

11 The Debtor is a corporation sole organized under the laws of the State of California. The Debtor
12 conducts its civil affairs under the laws of the State of California and the United States of America and in
13 accordance with the Code of Canon Law, the ecclesiastical law of the Roman Catholic Church. Additional
14 information regarding the Debtor, its mission, ministries, and operations, and the events and circumstances
15 preceding the Petition Date, is set forth in the *Declaration of Charles Moore, Managing Director of*
16 *Alvarez & Marsal North America, LLC, Proposed Restructuring Advisor to the Roman Catholic Bishop*
17 *of Oakland, in Support of Chapter 11 Petition and First Day Pleadings* (the “First Day Declaration”)
18 [Docket No. 19], which is incorporated herein by reference. Further information regarding the Debtor and
19 the Chapter 11 Case is found in the Debtor’s *Third Amended Disclosure Statement* filed on April 3, 2025
20 [Docket No. 1874] and the *Executive Summary, Frequently Asked Questions, and General Information*
21 *Regarding Debtor’s Fourth Amended Plan of Reorganization* filed on February 20, 2027 [Docket No.
22 2654-1], and the *Disclosure Statement in Support of the Debtor’s Modified Fourth Amended Plan of*
23 *Reorganization* filed on March 29, 2026 [Docket No. 2759].

24 **IV.**

25 **CLAIMS PROCESS**

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

1 On June 27, 2023, the Debtor filed the *Motion of the Debtor for an Order Establishing Deadlines*
2 *for Filing Proofs of Claim and Granting Related Relief* [Docket No. 181], seeking to establish September
3 11, 2023, as the deadline for filing all non-governmental proofs of claim.

4 On July 25, 2023, the Court entered the *Order Establishing Deadlines for Filing Proofs of Claim*
5 *and Approving the Form and Manner of Notice Thereof* [Docket No. 293] (the “Bar Date Order”). Under
6 the Bar Date Order, the Court set (a) September 11, 2023 at 5:00 p.m. (prevailing Pacific Time) as the
7 deadline for non-government creditors to file a proof of claim (the “General Bar Date”), and (b) November
8 6, 2023 at 5:00 p.m. (prevailing Pacific Time) as the deadline for governmental units to file a proof of
9 claim (the “Governmental Bar Date”).

10 The Bar Date Order also, among other things: (1) approved the form of the *Notice of Deadline*
11 *Requiring Filing of Proofs of Claim Arising out of Sexual Abuse* [Docket 285, Ex. 2] (the “Sexual Abuse
12 Bar Date Notice”), which provided, among other things, (a) notice to the Sexual Abuse Claimants that all
13 Sexual Abuse Claims¹ must be filed by the General Bar Date and (b) notice to Sexual Abuse Claimants
14 regarding the option to complete the *Optional Supplement to Official Form 410 for Use by Sexual Abuse*
15 *Claimants* (the “Supplement”) to be submitted with the Official Proof of Claim Form; (2) approved the
16 form of Supplement to be used; and (3) proscribed strict Confidentiality Protocols² and other protections
17 related to the information contained in both the proofs of claim ultimately filed and the optional
18 Supplements completed and submitted in connection therewith.

19 Since the occurrence of the General Bar Date applicable to, among other parties, creditors asserting
20 Abuse Claims, the Debtor and its professionals have carefully reviewed each and every Sexual Abuse
21 Claim, the documents submitted therewith, relevant records of the Debtor or that were provided to the
22 Debtor in the course of state-court litigation, and other publicly available information. At every step, the
23 Debtor’s intent was not to defeat or disprove the allegations contained in any Sexual Abuse Claims.
24 Rather, the Debtor sought to verify its own liability (if any) for the acts or omissions alleged, ensure that
25 Sexual Abuse Claims were properly accounted for, and determine whether any improper claims existed

26 _____
27 ¹ “Sexual Abuse Claimants” and “Sexual Abuse Claim” have the same meaning as the term is defined in the Bar Date Order.

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

1 that will dilute survivor recovery. Importantly, the Debtor gave Sexual Abuse Claimants the benefit of
2 every doubt in this review.

3 As described in the Debtor’s *Third Amended Disclosure Statement for Debtor’s Third Amended*
4 *Plan of Reorganization* [Docket 1874], approved by this Court on April 4, 2025 [see Docket 1877], the
5 vast majority of non-duplicate Sexual Abuse Claims filed in this bankruptcy case included the optional
6 Supplement in one form or another alongside the proof of claim form itself. In most proofs of claim, the
7 Supplement stated the “who, what, where, when, and how” of the alleged abuse, or, at a minimum, some
8 combination of those details.

9 As of February 23, 2026, there were 431 Sexual Abuse Claims filed or otherwise provided to the
10 Debtor’s approved claims-and-noticing agent. Of that number, at least 34 claims have been subsequently
11 amended or are duplicates of other claims. Further, at least 46 claims were filed after the General Bar
12 Date. All 46 such claims are not, however, disallowed or even disallowable, as some were either duplicates
13 or amended versions of timely filed claims, while others were subsequently allowed by Court order.

14 Specifically:

- 15 • On January 23, 2024, the Court entered an order deeming Claims No. 508, 510, 511, and
16 513-527 (a total of 18 claims) as timely filed [Docket No. 811];
- 17 • On May 28, 2024, the Court entered an order deeming Claim No. 552 as timely filed
18 [Docket No. 1150]; and
- 19 • On August 4, 2025, the Court entered an order deeming Claim No. 568 as timely filed
20 [Docket No. 2189].

21 Entry of these orders left approximately 26 late-filed claims outstanding. Of that number, 10 remain with
22 no Court order entered deeming them timely filed, 12 are being treated as supplements to timely filed
23 claims (and thus timely themselves), and 4 are mere duplicates or amendments of other claims. Of the 10
24 current late claims, two (Claim Nos. 564 and 565) are the subject of a *Motion to Allow Filing of Late*
25 *Proofs of Claim* [Docket No. 2130] that remains pending. As a result, there are currently 10 Sexual Abuse
26 Claims that are untimely and should be disallowed.

1 In addition to this Objection, the Debtor has prepared and intends to file a *Motion for Entry of an*
2 *Order Approving Claim Objection Procedures and Granting Related Relief*, requesting the Court establish
3 certain noticing and objection procedures with respect to future omnibus (but more substantive) claim
4 objections. For the avoidance of doubt, this Objection is not subject to the procedures contemplated in the
5 motion.

6 V.

7 **RELIEF REQUESTED**

8 By this Omnibus Objection, the Debtor seeks entry of an order granting the relief requested herein,
9 (1) disallowing each proof of claim listed below as they are either amended, duplicated by another claim,
10 or untimely and (b) granting relief from certain limitations of Bankruptcy Rule 3007 and Local Rule 3007-
11 1, as specified below. A proposed form of order granting the relief requested herein is attached hereto as
12 **Exhibit A** (the “Proposed Order”).

13 VI.

14 **BASIS FOR RELIEF REQUESTED**

15 A creditor holds a claim against a bankruptcy estate only to the extent (a) it has a “right to payment”
16 for the asserted liabilities and (b) the claim is otherwise allowable. 11 U.S.C. §§ 101(5) & 101(10). When
17 asserting a claim against a bankruptcy estate, a claimant must allege facts that, if true, would support
18 finding the debtor legally liable to the claimant. *In re Gonzelez*, 410 B.R. 868, 872 (Bankr. D. Ariz.)
19 (quoting *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173-174 (3d Cir. 1992)). Where the claimant alleges
20 sufficient facts to support its claim, its claim is afforded *prima facie* validity. *Allegheny*, 954 F.2d at 173.
21 “To defeat the claim, the objector must come forward with sufficient evidence and ‘show facts tending to
22 defeat the claim by probative force equal to that of the allegations of the proofs of claim themselves.’”
23 *Lundell v. Anchor Const. Specialists, Inc.*, 223 F.3d 1035, 1039 (9th Cir. 2000) (quoting *Wright v. Holm*
24 *(In re Holm)*, 931 F.2d 620, 623 (9th Cir. 1991)). Once an objecting party produces such evidence, the
25 burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the
26 evidence. *Ashford v. Consolidated Pioneer Mort (In re Consol Pioneer Mortg.)*, 178 B.R. 222, 226 (9th
27 Cir. B.A.P. 1995). Ultimately, the claimant has the burden of persuasion. *Id.*

1 Bankruptcy Rule 3007(d) provides certain grounds upon which “objections to more than one claim
2 may be joined in an omnibus objection,” which includes when “the objections are based solely on the
3 grounds that the claims should be disallowed, in whole or in part, because . . . (1) they duplicate other
4 claims; . . . (3) they have been amended by subsequently filed proof of claims; [or] (4) they were not
5 timely filed.” FED. R. BANKR. P. 3007(d).

6 **A. Amended Claims**

7 Certain proofs of claim filed by Abuse Claimants have been amended by subsequently filed proofs
8 of claim. The updated claims (the “Remaining Claims”) are identified by claim number in the
9 “REMAINING CLAIMS” column below. The earlier-filed proofs of claim listed in the “AMENDED
10 CLAIMS TO BE DISALLOWED” column (the “Amended Claims”) thus no longer represent valid proofs
11 of claim against the Debtor’s estate.

	Amended Claims to Be Disallowed	Remaining Claims
12	1.	Claim No. 528
13	2.	Claim No. 419
14		Claim No. 558

15 Failure to disallow and expunge the Amended Claims listed in the “AMENDED CLAIMS TO BE
16 DISALLOWED” column could result in the applicable claimants receiving multiple recoveries against
17 the Debtor’s estate, to the detriment of similarly situated creditors. Elimination of the Amended Claims
18 will enable the Debtor to maintain a more accurate claims register. The disallowance and expungement of
19 the Amended Claims will not prejudice these claimants or their substantive rights against the Debtor
20 because each of their Remaining Claims will remain on the Claims Register, subject to the ongoing rights
21 of the Debtor and other parties in interest to object to the Remaining Claims on any other applicable
22 grounds.

23 Accordingly, the Debtor (a) objects to the Amended Claims and (b) requests the Court to disallow
24 and expunge the Amended Claims in their entirety.

25 **B. Duplicate Claims**

26 Certain claims (the “Duplicative Claims”) identified in the “DUPLICATIVE CLAIMS TO BE
27 DISALLOWED” column below are duplicative of other proofs of claim (the “Remaining Claims”)

1 identified in the “REMAINING CLAIMS” column below. Although all the Duplicative Claims are
 2 duplicative of another claim, certain of the Remaining Claims contain additional supporting information
 3 attached to the claim, which is how the Debtor selected such claims to be the Remaining Claims. For the
 4 avoidance of doubt, in determining which claims to allow as Remaining Claims, the Debtor gave the
 5 benefit of every doubt to the respective claimant, its purpose being to select whichever claim provided the
 6 most complete information regarding the alleged Sexual Abuse.

	Duplicative Claims to be Disallowed	Remaining Claims
1.	Claim No. 34	Claim No. 411
2.	Claim No. 35	Claim No. 263
3.	Claim No. 38	Claim No. 411
4.	Claim No. 57	Claim No. 498
5.	Claim No. 66	Claim No. 355
6.	Claim No. 99	Claim No. 566
7.	Claim No. 102	Claim No. 567
8.	Claim No. 123	Claim No. 107
9.	Claim No. 124	Claim No. 109
10.	Claim No. 125	Claim No. 111
11.	Claim No. 126	Claim No. 113
12.	Claim No. 191	Claim No. 204
13.	Claim No. 192	Claim No. 495
14.	Claim No. 209	Claim No. 198
15.	Claim No. 217	Claim No. 553
16.	Claim No. 219	Claim No. 555
17.	Claim No. 272	Claim No. 275
18.	Claim No. 276	Claim No. 281
19.	Claim No. 277	Claim No. 493
20.	Claim No. 390	Claim No. 392
21.	Claim No. 418	Claim No. 549
22.	Claim No. 438	Claim No. 537
23.	Claim No. 439	Claim No. 560
24.	Claim No. 440	Claim No. 559
25.	Claim No. 442	Claim No. 274
26.	Claim No. 449	Claim No. 507
27.	Claim No. 478	Claim No. 392
28.	Claim No. 480	Claim No. 531
29.	Claim No. 482	Claim No. 533
30.	Claim No. 495	Claim No. 556
31.	Claim No. 512	Claim No. 511
32.	Claim No. 569	Claim No. 59

1 The Debtor is not required to pay twice on the same obligation. Such a result would only harm the
2 Debtor's other creditors, including other Abuse Claimants. Disallowance of these redundant claims will
3 enable the Claims Register to more accurately reflect the Abuse Claims asserted against the Debtor. The
4 disallowance and expungement of the Duplicative Claims will not prejudice any claimants or their
5 substantive rights against the Debtor because each Remaining Claim will remain on the Claims Register,
6 subject to the Debtor's ongoing rights to object to the Remaining Claims on other applicable grounds.

7 Therefore, the Debtor (a) objects to the Duplicative Claims and (b) requests the Court to disallow
8 and expunge the Duplicative Claims in their entirety.

9 **C. Late Filed Claims**

10 The proofs of claim listed below (the "Late Filed Claims") were not timely filed as they were filed
11 after the General Bar Date (September 11, 2023) nor were they deemed timely filed by Court order.

	Late Filed Claims to be Disallowed	Date Filed
12	1. Claim No. 509	09/12/2023
13	2. Claim No. 532	09/20/2023
14	3. Claim No. 542	11/02/2023
15	4. Claim No. 550	12/25/2023
16	5. Claim No. 561	06/28/2024
17	6. Claim No. 563	11/25/2024
18	7. Claim No. 564	12/10/2024
19	8. Claim No. 565	12/10/2024
	9. Claim No. 570	11/11/2025
	10. Claim No. 571	01/16/2026

20 Therefore, the Debtor (a) objects to the Late Filed Claims and (b) requests the Court to disallow
21 and expunge each Late Filed Claim in its entirety.

22 **VII.**

23 **WAIVER OF BANKRUPTCY RULE 3007 AND LOCAL RULE 3007-1**

24 Bankruptcy Rule 3007 requires that an objecting party serve a copy of the claim objection with
25 notice of a hearing on affected claimants. *See* FED. R. BANKR. P. 3007(a)(2). It also requires omnibus
26 claim objections disclose the name or identity of each claimant. *See* FED. R. BANKR. P. 3007(e)(1)-(2).

1 Local Rule 3007-1 further provides that all claim objections attach a copy of the claim unless the Court
2 orders otherwise. *See* Local Rule 3007-1(a).

3 The Debtor requests a waiver of the Bankruptcy Rules and Local Rule set forth above in order to
4 comply with the Confidentiality Protocol set forth in the Bar Date Order. Specifically, the Confidentiality
5 Protocol provide, among other things:

- 6 • Who May Receive Copies of Official Proof of Claim Forms and/or Supplements Filed by,
7 or on Behalf of, Sexual Abuse Claimants. Official Proof of Claim Forms and/or the
8 Supplement filed by, or on behalf of a Sexual Abuse Claimant, with the Claims Agent shall
9 be held and be treated as strictly confidential and will be made available only to the
10 following parties (the “**Authorized Parties**”):
 - 11 ○ The Debtor, officers of the Debtor, and such other current or former employees of
12 the Debtor who are necessary to assist the Debtor in verifying the facts contained
13 in the Official Proof of Claim Form and/or the Supplement filed by, or on behalf of
14 a Sexual Abuse Claimant; provided, however, that if the Debtor determines that the
15 assistance of the alleged abuser is necessary to verify the facts contained in the
16 Official Proof of Claim Form and/or the Supplement filed by, or on behalf of a
17 Sexual Abuse Claimant, the Debtor shall redact and not otherwise share the Sexual
18 Abuse Claimant’s address or telephone number or any other personally identifiable
19 information than is otherwise necessary to confirm the facts contained in the
20 Official Proof of Claim Form and/or the Supplement;
 - 21 ○ Counsel to the Debtor and the Committee retained pursuant to an order of this
22 Court, including any experts retained by or on behalf of the Debtor and the
23 Committee under an order of this Court;
 - 24 ○ Members of the Committee and their counsel (after the Official Proof of Claim
25 Form and/or the Supplement have been redacted to remove the Sexual Abuse
26 Claimant’s name, address, and any other personally identifiable information in the
27 Official Proof of Claim Form and/or the Supplement);
 - 28 ○ Any insurance company that issued insurance policies for the period of time during
which the Official Proof of Claim Form and/or Supplement filed by a Sexual Abuse
Claimant alleges the sexual abuse to have occurred (each an “**Insurer**”), together
with their respective successors, regulators, reinsurers, administrators, and counsel
(together, the “**Insurer Authorized Parties**”) (after the Official Proof of Claim
Form and/or the Supplement have been redacted to remove the Sexual Abuse
Claimant’s name, address, and any other personally identifiable information in the
Official Proof of Claim Form and/or the Supplement, provided that all such
personally identifiable information shall be provided to the Insurer Authorized
Parties by use of a separate key or other security mechanism mutually agreed by
the Debtor, the Committee, and the Insurer Authorized Parties);
 - Any person appointed pursuant to an order of the Court to serve as a mediator, as a
representative for unknown or future claimants, or as a special arbitrator/claims
reviewer appointed to review and resolve Sexual Abuse Claims;
 - Any trustee, or functional equivalent thereof, appointed to administer payments to

1 Sexual Abuse Claimants, including pursuant to a plan of reorganization or a
2 proposed plan of reorganization;

- 3 ○ Authorized representatives of a department of corrections, if a Sexual Abuse
4 Claimant is incarcerated, but only with respect to any Official Proof of Claim Form
5 and/or Supplement filed by such Sexual Abuse Claimant and only to the extent
6 disclosure is required under applicable non-bankruptcy law;
 - 7 ○ Any other person upon express written consent of the affected Sexual Abuse
8 Claimant, provided, however, that if the Sexual Abuse Claimant filed his or her
9 Sexual Abuse Claim pro se, then consent of the Sexual Abuse Claimant and counsel
10 to the Committee shall be obtained before disclosing such Sexual Abuse Claimant's
11 Official Proof of Claim Form and/ or the Supplement to any person;
 - 12 ○ Any other person upon express written consent of the Debtor and the Committee,
13 upon 10 business days' notice to the affected Sexual Abuse Claimant(s) and their
14 attorney, if known. A Sexual Abuse Claimant may file an objection with this Court
15 concerning the disclosure of the Sexual Abuse Claimant's Official Proof of Claim
16 Form and/ or the Supplement within the notice period;
 - 17 ○ Such other persons as this Court may, pursuant to subsequent order, authorize
18 access to a Sexual Abuse Claimant's Official Proof of Claim Form and/ or the
19 Supplement; provided, however, that any such determination shall be made on no
20 less than 10 business days' notice to the affected Sexual Abuse Claimant(s) and
21 their counsel of record, the Committee and the Debtor;
 - 22 ○ Counsel of record to any Authorized Party upon execution of a Confidentiality
23 Agreement by such counsel; and
 - 24 ○ The Office of the United States Trustee.
- 25 • Execution of Confidentiality Agreement Required. Notwithstanding the designation of
26 Authorized Parties above, no person or entity may obtain copies of any Official Proof of
27 Claim Form and/or Supplement filed by, or on behalf of, a Sexual Abuse Claimant prior to
28 the execution of a confidentiality agreement substantially in the form attached to the
Exhibit Notice(the "**Confidentiality Agreement**"); provided however, that the Office of
the United States Trustee shall not be required to execute such Confidentiality Agreement.
Counsel to the Debtor, the Committee, and the Insurer Authorized Parties shall only be
required to execute a single Confidentiality Agreement on behalf of those entities and their
respective clients, which shall be deemed binding on their entire firm and their respective
clients. Access to the Official Proof of Claim Form and/or Supplement filed by, or on
behalf of a Sexual Abuse Claimant, for all other Authorized Parties shall be restricted to
the natural person who executes a Confidentiality Agreement and a separate
Confidentiality Agreement must be signed by each natural person seeking access to the
Official Proof of Claim Form and/or the Supplement filed by, or on behalf of a Sexual
Abuse Claimant, on behalf of an Authorized Party.
 - Scope of Confidentiality Afforded Sexual Abuse Claimants' Official Proof of Claim Form
and/or the Supplement. Authorized Parties receiving a copy of a Sexual Abuse Claimants'
Official Proof of Claim Form and/or the Supplement shall keep the Sexual Abuse
Claimants' Official Proof of Claim Form and/or the Supplement confidential and are only
permitted to share the Sexual Abuse Claimants' Official Proof of Claim Form and/or the
Supplement with an Authorized Party.

- Scope of Confidentiality Afforded Information Contained in Sexual Abuse Claimants' Official Proof of Claim Form and/or the Supplement. Authorized Parties receiving a copy of a Sexual Abuse Claimants' Official Proof of Claim Form and/or the Supplement shall keep Confidential Information (defined in the Confidentiality Agreement) contained in the Sexual Abuse Claimants' Official Proof of Claim Form and/or the Supplement confidential and are only permitted to share the Confidential Information contained in a Sexual Abuse Claimants' Official Proof of Claim Form and/or the Supplement with an Authorized Party; provided, however, except as set forth in any order of this Court regarding the confidentiality, if any, of the names of those having been accused of having committed the abuse or having covered up the abuse, a Sexual Abuse Claimant may elect to disclose and/or disseminate information which is Confidential Information contained in his or her Official Proof of Claim Form and/or the Supplement (but not the Official Proof of Claim Form and/or the Supplement itself) and such disclosure or dissemination shall not constitute a waiver of confidentiality.
- Permitted Use. An Authorized Party may only use a Sexual Abuse Claimants' Official Proof of Claim Form and/or the Supplement and any information contained therein as set forth in the Confidentiality Agreement.

Because the Debtor intends to, and will, serve or caused to be served each creditor (or their counsel or other designated representative) whose claim is subject to this Objection with a copy of this Objection and a copy of their filed proof of claim, each claimant will receive sufficient notice of the Objection. Moreover, to the extent the Committee intends to weigh in on the Objection, the Committee will receive immediate notice of this Objection when it is filed. No party will be prejudiced by this waiver. Due to the highly sensitive and confidential nature of the Abuse Claims, the Debtor believes this waiver is necessary to maintain the confidentiality of Abuse Claimants' personal information and to comply with the Confidentiality Protocol contained in the Bar Date Order.

VIII.

RESERVATION OF RIGHTS

The rights of the Debtor to (i) file subsequent objections to any claims subject hereto on any ground; (ii) amend, modify, or supplement this Objection including, without limitation, the filing of objections to further amended or newly filed claims; (iii) seek to expunge or reduce any claim to the extent all or a portion of such claim has been paid; (iv) object on any basis to any claim, in whole or in part; and (v) settle for any claim for less than the asserted amount, are fully reserved. Separate notice and a hearing will be provided in connection with any additional objections.

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IX.

NOTICE OF OBJECTION

In addition to the Debtor's standard noticing procedures, the Debtor will cause this Objection to be served via first class mail and electronic mail (to the extent known) to each Sexual Abuse Claim subject to this Objection and their respective counsel, if known. The Debtor will also provide a copy of each claimant's respective proof of claims to claimant and their counsel in compliance with the Confidentiality Protocol set forth in the Bar Date Order. The Debtor submits that in light of the nature of the relief requested herein no other further notice need be given.

X.

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

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10 *Counsel for the Debtor*
11 *and Debtor in Possession*

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**

15 In re:

16 THE ROMAN CATHOLIC BISHOP OF
17 OAKLAND, a California corporation sole,

18 Debtor.

Case No: 23-40523

**[PROPOSED] ORDER SUSTAINING
DEBTOR'S FIRST OMNIBUS OBJECTION
TO CERTAIN AMENDED, DUPLICATED,
AND LATE FILED CLAIMS**

Judge: Hon. William J. Lafferty

Date: TBD

Time: TBD

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

1 Upon the *Debtor's First Omnibus Objection to Certain Amended, Duplicated, and Late Filed*
2 *Claims* [Docket No. [•]] (the "Objection"),¹ filed by the Roman Catholic Bishop of Oakland, a California
3 corporation sole (the "Debtor") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11
4 Case"), for entry of an order, pursuant to Sections 101(5) and 101(10) of title 11 of the United States Code
5 (the "Bankruptcy Code") and Rules 3007 and 9014 of the Federal Rules of Bankruptcy Procedures (the
6 "Bankruptcy Rules"), authorizing the Debtor to disallow or expunge certain late filed proofs of claim; the
7 Court having reviewed and considered the Objection, and all other filings in support of the Objection and
8 the statements of counsel at the hearing on the Objection; the Court having found it has jurisdiction over
9 this matter, venue in this Court is proper, and notice of the Objection was reasonable and sufficient under
10 the circumstances; and the Court having found the relief requested in the Objection is in the best interests
11 of the Debtor, its estate, its creditors, and other parties in interest; and after due deliberation and good
12 cause appearing therefor,

13 **IT IS HEREBY ORDERED THAT:**

14 1. The Objection is sustained as set forth herein.
15 2. Each Amended Claim listed in the column titled "AMENDED CLAIMS DISALLOWED"
16 identified in Schedule 1 hereto is disallowed and expunged in its entirety. The Remaining Claims listed
17 in the column titled "REMAINING CLAIMS" identified on Schedule 1 hereto shall remain on the Claims
18 Register, subject to Debtor's further objections on any substantive or non-substantive grounds and further
19 order of the Court.

20 3. Each Duplicative Claim listed in the column titled "DUPLICATIVE CLAIMS
21 DISALLOWED" identified in Schedule 2 hereto is disallowed and expunged in its entirety. The
22 Remaining Claims listed in the column titled "REMAINING CLAIMS" identified on Schedule 2 hereto
23 shall remain on the Claims Register, subject to Debtor's further objections on any substantive or non-
24 substantive grounds and further order of the Court.

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27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the
28 Objection.

COURT SERVICE LIST

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All ECF Recipients.

ORDER SUSTAINING DEBTOR'S FIRST
OMNIBUS OBJECTION TO AMENDED, DUPLICATED, AND FILED CLAIMS

Debtor's First Omnibus Objection

SCHEDULE 1

Claims to be Disallowed

	Amended Claims Disallowed	Remaining Claims
1.	Claim No. 528	Claim No. 401
2.	Claim No. 419	Claim No. 558

Debtor's First Omnibus Objection

SCHEDULE 2

Claims to be Disallowed and Expunged

	Duplicative Claims Disallowed	Remaining Claims
1.	Claim No. 34	Claim No. 411
2.	Claim No. 35	Claim No. 263
3.	Claim No. 38	Claim No. 411
4.	Claim No. 57	Claim No. 498
5.	Claim No. 66	Claim No. 355
6.	Claim No. 99	Claim No. 566
7.	Claim No. 102	Claim No. 567
8.	Claim No. 123	Claim No. 107
9.	Claim No. 124	Claim No. 109
10.	Claim No. 125	Claim No. 111
11.	Claim No. 126	Claim No. 113
12.	Claim No. 191	Claim No. 204
13.	Claim No. 192	Claim No. 495
14.	Claim No. 209	Claim No. 198
15.	Claim No. 217	Claim No. 553
16.	Claim No. 219	Claim No. 555
17.	Claim No. 272	Claim No. 275
18.	Claim No. 276	Claim No. 281
19.	Claim No. 277	Claim No. 493
20.	Claim No. 390	Claim No. 392
21.	Claim No. 418	Claim No. 549
22.	Claim No. 438	Claim No. 537
23.	Claim No. 439	Claim No. 560
24.	Claim No. 440	Claim No. 559
25.	Claim No. 442	Claim No. 274
26.	Claim No. 449	Claim No. 507
27.	Claim No. 478	Claim No. 392
28.	Claim No. 480	Claim No. 531
29.	Claim No. 482	Claim No. 533
30.	Claim No. 495	Claim No. 556
31.	Claim No. 512	Claim No. 511
32.	Claim No. 569	Claim No. 59

Debtor's First Omnibus Objection

SCHEDULE 3

Claims to be Disallowed and Expunged

	Late Filed Claim Disallowed	Filed Date
1.	Claim No. 509	09/12/2023
2.	Claim No. 532	09/20/2023
3.	Claim No. 542	11/02/2023
4.	Claim No. 550	12/25/2023
5.	Claim No. 561	06/28/2024
6.	Claim No. 563	11/25/2024
7.	Claim No. 564	12/10/2024
8.	Claim No. 565	12/10/2024
9.	Claim No. 570	11/11/2025
10.	Claim No. 571	01/16/2026