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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

**DECLARATION OF MARK C. MOORE IN
SUPPORT OF DEBTOR'S FIRST OMNIBUS
OBJECTION TO CERTAIN AMENDED,
DUPLICATED, AND LATE FILED CLAIMS**

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 First Omnibus Objection to Certain Amended,*
7 *Duplicated, and Late Filed Claims* filed concurrently herewith (the “Objection”).¹

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

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

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

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

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

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

10 7. Since the occurrence of the General Bar Date applicable to, among other parties, creditors
11 asserting Abuse Claims, I and other professionals at Foley, acting under my direct supervision, have
12 carefully reviewed each and every Sexual Abuse Claim, the documents submitted therewith, relevant
13 records of the Debtor or that were provided to the Debtor in the course of state-court litigation, and other
14 publicly available information. At every step, the Debtor’s intent in this review was not to defeat or
15 disprove the allegations contained in any Sexual Abuse Claims. Rather, I understand that the Debtor
16 sought to verify its own liability (if any) for the acts or omissions alleged, ensure that Sexual Abuse Claims
17 were properly accounted for, and determine whether any improper claims existed that will dilute survivor
18 recovery. Importantly, I and the individuals reviewing the Sexual Abuse Claims at my direction for the
19 Debtor gave Sexual Abuse Claimants the benefit of every doubt in this review.

20 8. As described in the Debtor’s *Third Amended Disclosure Statement for Debtor’s Third*
21 *Amended Plan of Reorganization* [Docket 1874], approved by this Court on April 4, 2025 [see Docket
22 1877], the vast majority of non-duplicate Sexual Abuse Claims filed in this bankruptcy case included the
23 optional Supplement in one form or another alongside the proof of claim form itself. In most proofs of
24 claim, the Supplement stated the “who, what, where, when, and how” of the alleged abuse, or, at a
25 minimum, some combination of those details. As of February 23, 2026, approximately 88% of all Sexual
26 Abuse Claims filed in this bankruptcy case included some version of the Supplement.

1 9. As of February 23, 2026, I understand that there were 431 Sexual Abuse Claims filed or
2 otherwise provided to Verita. Of that number, I determined that at least 34 claims have been subsequently
3 amended or are duplicates of other claims. Further, I determined that at least 46 claims were filed after the
4 General Bar Date based on the date and time of receipt electronically and/or physically stamped on such
5 claims (or the electronic cover sheet generated upon electronic filing through the online claim portal) by
6 Verita. All 46 such claims are not, however, disallowed or even disallowable, as some were either
7 duplicates or amended versions of timely filed claims, while others were subsequently allowed by Court
8 order. Specifically:

- 9 • On January 23, 2024, the Court entered an order deeming Claims No. 508, 510, 511, and
10 513-527 (a total of 18 claims) as timely filed [Docket No. 811];
- 11 • On May 28, 2024, the Court entered an order deeming Claim No. 552 as timely filed
12 [Docket No. 1150]; and
- 13 • On August 4, 2025, the Court entered an order deeming Claim No. 568 as timely filed
14 [Docket No. 2189].

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

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

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

24
25 /s/ Mark C. Moore
26 Mark C. Moore
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DECL. OF M. MOORE ISO DEBTOR'S FIRST OMNIBUS OBJECTION TO
AMENDED, DUPLICATED, AND LATE FILED CLAIMS