Alison V. Lippa (SBN: 160807)
alippa@nicolaidesllp.com
NICOLAIDES FINK THORPE
MICHAELIDES SULLIVAN LLP
101 Montgomery Street, Suite 2300
San Francisco, CA 94104
Telephone: (415) 745-3770
Facsimile: (415) 745-3771

Amy P. Klie (*Pro Hac Vice Pending*)
aklie@nicolaidesllp.com
NICOLAIDES FINK THORPE
MICHAELIDES SULLIVAN LLP
10 S. Wacker Dr., Suite 2100
Chicago, Illinois 60606
Telephone: (312) 585-1400

Attorneys for Defendants
American Home Assurance Co.
and Lexington Insurance Co.

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re: THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole, Debtor. THE ROMAN CATHOLIC BISHOP OF OAKLAND, Plaintiff, v. AMERICAN HOME ASSURANCE CO., a New York corporation; LEXINGTON INSURANCE CO., a Delaware corporation Defendants.	CHAPTER 11 Case No. 23-40523 WJL Adversary Case No. 23-04037 **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT FOR BREACH OF CONTRACT AND DECLARATORY JUDGMENT RELIEF** **STATUS CONFERENCE**: Date: November 1, 2023 Time: 10:30 a.m. Place: United States Bankruptcy Court 1300 Clay Street Courtroom 220 Oakland, CA 94612

TO THE HONORABLE COURT, AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

WHEREAS, on May 8, 2023, The Roman Catholic Bishop of Oakland ("Debtor") filed a voluntary petition for relief under Title 11 of the United States Code.

WHEREAS, on August 30, 2023, the Debtor filed its Complaint for Breach of Contract and Declaratory Relief ("Complaint"), naming American Home Assurance Company and Lexington Company as defendants (collectively, "Defendants").

WHEREAS, on August 31, 2023, the Clerk of the Court issued a Summons and Notice of Scheduling Conference in an Adversary Proceeding ("Summons").

WHEREAS, on September 14, 2023, the Defendants were served with a copy of the Summons and Complaint.

WHEREAS, the Debtor has agreed to an extension of time for the Defendants to file and serve their written response until October 31, 2023.

NOW, THEREFORE, in consideration of the foregoing, the parties hereto, by and through their attorneys of record, hereby agreed and stipulate as follows:

1. The deadline for filing service of the Defendants' answer or other responses to the Complaint shall be extended to October 31, 2023.
2. Nothing herein shall constitute a waiver of and defense that the Defendants may have to any claim against them, including any defense related to jurisdiction over the Defendants.

Dated: September 29, 2023

NICOLAIDES FINK THORPE MICHAELIDES SULLIVAN LLP

By: */s/ Alison V. Lippa*
Alison V. Lippa
American Home Assurance Co.
And Lexington Insurance Co.

Dated: September 29, 2023

BREALL & BREALL, LLP

By: */s/ Joseph M. Breall*
Joseph M. Breall
Proposed Special Insurance Counsel For Debtor, The Roman Catholic Bishop Of Oakland