LOWENSTEIN SANDLER LLP
JEFFREY D. PROL (Pro Hac Vice)
jprol@lowenstein.com
MICHAEL A. KAPLAN (Pro Hac Vice)
mkaplan@lowenstein.com
BRENT WEISENBERG (Pro Hac Vice)
bweisenberg@lowenstein.com
COLLEEN M. RESTEL (Pro Hac Vice)
crestel@lowenstein.com
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone: (973) 597-2500

Counsel for the Official Committee of Unsecured Creditors

KELLER BENVENUTTI KIM LLP
TOBIAS S. KELLER (Cal. Bar No. 151445)
tkeller@kbkllp.com
JANE KIM (Cal. Bar No. 298192)
jkim@kbkllp.com
GABRIELLE L. ALBERT (Cal. Bar No. 190895)
galbert@kbkllp.com
425 Market St., 26th Floor
San Francisco, California 94105
Telephone: (415) 496-6723

BURNS BAIR LLP
TIMOTHY W. BURNS (Pro Hac Vice forthcoming)
tburns@burnsbair.com
JESSE J. BAIR (Pro Hac Vice forthcoming)
jbair@burnsbair.com
10 East Doty Street, Suite 600
Madison, Wisconsin 53703-3392
Telephone: (608) 286-2808

Special Insurance Counsel for the Official Committee of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re: THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole, Debtor.	Chapter 11 Case No: 23-40523 WJL Hon. William J. Lafferty III **OFFICIAL COMMITTEE OF UNSECURED CREDITORS' JOINDER TO DEBTOR'S OPPOSITION TO CIGA'S MOTION TO DISMISS OR FOR A MORE DEFINITIVE STATEMENT**
THE ROMAN CATHOLIC BISHOP OF OAKLAND, Plaintiff, PACIFIC INDEMNITY, a Delaware corporation; *et al*. Defendants.	Adversary Case No. 23-04028 WJL

Case: 23-04028 Doc# 137 Filed: 10/25/23 Entered: 10/25 2340523231026000000000002

The Official Committee of Unsecured Creditors (the "Committee") files this joinder (the "Joinder") to *Debtor's Opposition to Motion of California Insurance Guarantee Association to Dismiss Adversarial Complaint or Alternatively for a More Definite Statement* [Dkt. No. 136] (the "Opposition"). In support of this Joinder, the Committee states as follows:

1. The Committee incorporates by reference and hereby joins in the arguments set forth in the Opposition.

2. The Committee requests that the Court deny the *Motion of Defendant California Insurance Guarantee Association to Dismiss Adversarial Complaint or Alternatively for a More Definite Statement* [Dkt. No. 106] (the "Motion").

3. As the Committee explained in its opposition to the motions to dismiss brought by certain other insurance companies [Dkt. No. 114], it is essential that all parties to the insurance dispute—including, in this case, the California Insurance Guarantee Association—be part of the insurance adversary proceeding so that coverage issues applicable to all insurers can be adjudicated in a comprehensive and organized manner.

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

4. The Committee reserves its right to supplement this Joinder, to file a more fulsome pleading in opposition to the Motion, and to participate in any hearing to consider the Motion.

Dated: October 25, 2023

LOWENSTEIN SANDLER LLP
KELLER BENVENUTTI KIM LLP

By: *Gabrielle L. Albert*
Jeffrey D. Prol
Michael A. Kaplan
Colleen M. Restel

- and –

Tobias S. Keller
Jane Kim
Gabrielle L. Albert

Counsel for the Official Committee of Unsecured Creditors

BURNS BAIR LLP
Timothy W. Burns
Jesse J. Bair

Special Insurance Counsel for the Official Committee of Unsecured Creditors