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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re: THE ROMAN CATHOLIC BISHOP OF OAKLAND, Debtor.	Chapter 11 Case No. 23-40523 WJL Adv. Pro. No. 23-04028 WJL
THE ROMAN CATHOLIC BISHOP OF OAKLAND, Plaintiff, v. PACIFIC INDEMNITY, et al., Defendants	**PACIFIC'S RESPONSE TO CERTIFICATION OF MICHAL A. KAPLAN IN SUPPORT OF PROPOSED SCHEDULING ORDER**

Case: 23-04028 Doc# 139 Filed: 10/26/23 Entered: 10/26 2340523231026000000000004

Insurance Company of North America; Pacific Indemnity Company; and Pacific Employers Insurance Company (collectively, "Pacific"), through their undersigned counsel, hereby file this response (the "Response") to the *Certification of Michael A. Kaplan in Support of Proposed Scheduling Order* [Dkt. No. 555] (the "UCC Certification").[1]

1. Pacific agrees to a hearing date of November 14, 2023 for all the Motions, and agrees with the Committee's proposed briefing schedule as set forth in the UCC's Certification for the 2004 Motion only.

2. For the remaining Motions (other than the 2004 Motion, as noted above), Pacific proposes the following briefing schedule:

- Response Deadline: November 3, 2023
- Reply Deadline: November 9, 2023

3. Following the Committee's filing of the UCC Certification, Pacific, the Committee, and the Debtor conferred by e-mail on Pacific's above-proposed briefing schedule for the remaining Motions. It is Pacific's understanding that the Committee and the Debtor are unopposed to the above briefing schedule with respect to the remaining Motions.

4. WHEREFORE, Pacific respectfully requests that the Court enter the proposed scheduling order on the Motions as modified as set forth herein.

[Remainder of page intentionally left blank.]

[1] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the UCC Certification.

Case: 23-04028 Doc# 139 Filed: 10/26/23 Entered: 10/26/23 07:27:06 Page 2 of 3

Dated: October 26, 2023

By: */s/ Karen Rinehart*

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Case: 23-04028 Doc# 139 Filed: 10/26/23 Entered: 10/26/23 07:27:06 Page 3 of 3