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Counsel to 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. --- THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF THE ROMAN CATHOLIC BISHOP OF OAKLAND, Plaintiff, v. THE ROMAN CATHOLIC BISHOP OF OAKLAND, ADVENTUS, THE ROMAN CATHOLIC WELFARE CORPORATION OF OAKLAND,	Case No. 23-40523 WJL Chapter 11 Adv. Pro. 24-04053 **STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT**

AND THE ROMAN CATHOLIC CEMETERIES OF THE DIOCESE OF OAKLAND, Defendants.	)

Pursuant to B.L.R. 9006-1(b) and B.L.R 1002-1, Plaintiff the Official Committee of Unsecured Creditors ("Committee") and Defendants The Roman Catholic Bishop of Oakland, Adventus, The Roman Catholic Welfare Corporation of Oakland, and The Roman Catholic Cemeteries of the Diocese of Oakland (the "Defendants," and together with the Committee, the "Parties"), by and through the undersigned counsel, stipulate and agree, upon entry of this Stipulation as an Order of the Court, as follows:

1. The Committee filed the *Adversary Complaint for Declaratory Relief* (the "Complaint") on December 11, 2024.

2. Pursuant to the *Summons and Notice of Scheduling Conference* (Dkt. No. 4), the current deadline for the Defendants to respond to the Complaint (the "Defendants' Response Deadline") is January 13, 2025, and the scheduling conference is set for February 12, 2025.

3. Pursuant to the *Order Re Initial Disclosures and Discovery Conference* (Dkt No. 5) (the "Pretrial Scheduling Order"), the Parties' current deadline to hold a discovery conference (the "Discovery Conference Deadline") is January 22, 2025, and the Parties' current deadline to submit initial disclosures pursuant to Rule 26(a) (the "Initial Disclosures Deadline") is February 5, 2025.

4. The Defendants have accepted service of the Complaint.

5. The Defendants will keep all defenses or objections to the lawsuit, the Court's jurisdiction, and the venue of the action, but waive any defenses or objections related to service or to the absence of a summons.

6. The Defendants' Response Deadline shall be extended to and including January 24, 2025.

7. The Discovery Conference Deadline shall be extended to and including January 31, 2025.

8. The Initial Disclosures Deadline shall be extended to and including February 14, 2025.

9. The scheduling conference shall be adjourned to [February 26, 2025].

10. This Order shall be deemed a satisfaction of the Committee's proof of service obligations set forth in paragraph 6 of the Pretrial Scheduling Order.

11. The extensions set forth in this Stipulation are without prejudice to further extensions, either by agreement between the Parties or order of the Court.

IT IS SO STIPULATED.

(*signatures next page*)

Dated: January 10, 2025

KELLER BENVENUTTI KIM LLP
LOWENSTEIN SANDLER LLP

By: */s/ Gabrielle L. Albert*
Tobias S. Keller
Jane Kim
Gabrielle L. Albert

- and -

Jeffrey D. Prol
Michael A. Kaplan
Brent Weisenberg
Nicole Fulfree

Dated: January 10, 2025

FOLEY & LARDNER

/s/ Geoff Goodman

Counsel for Debtor The Roman Catholic Bishop of Oakland

Dated: January 10, 2025

NORTON ROSE FULBRIGHT US LLP

/s/ Ryan E. Manns

Counsel for Adventus, The Roman Catholic Cemeteries of the Diocese of Oakland, and The Roman Catholic Welfare Corporation of Oakland