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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
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF THE ROMAN CATHOLIC BISHOP OF OAKLAND Plaintiff, vs. THE ROMAN CATHOLIC BISHOP OF OAKLAND, and THE OAKLAND PAROCHIAL FUND, INC. Defendants.	Adv. Pro. No. 24-04051 WJL **STIPULATION AND CONSENT ORDER TO DISMISS NON-DEBTOR THE OAKLAND PAROCHIAL FUND, INC.**

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The Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland (the "Committee") and The Oakland Parochial Fund, Inc. ("OPF") hereby request the Court to approve the stipulation set forth below and dismiss (without prejudice) the claims in this Adversary Proceeding (defined below), solely as against OPF.

WHEREAS The Roman Catholic Bishop of Oakland ("RBCO") filed a bankruptcy petition in this Court on May 8, 2023 (the "RCBO Bankruptcy").

WHEREAS the Committee instituted the above captioned adversary proceeding in the RCBO Bankruptcy (the "Adversary Proceeding") and filed a First Amended Complaint ("FAC") on April 30, 2025.

WHEREAS OPF filed a Motion to Dismiss the FAC on May 23, 2025.

WHEREAS the Court denied the Motion to Dismiss at an oral hearing on June 13, 2025.

WHEREAS the Court entered an Order denying the Motion to Dismiss on June 17, 2025.

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

1. OPF holds assets on behalf of and for the benefit of RCBO (the "RCBO Assets").

2. Some of the RCBO Assets are identified as restricted assets in OPF's records.

3. OPF does not have the right or authority to unilaterally identify the RCBO assets as restricted, and OPF only identifies RCBO Assets as restricted at the direction of RCBO.

4. OPF agrees that it has possession, custody, and control over some factual information relevant to whether and why RCBO Assets are identified as restricted, unrestricted, or otherwise. OPF agrees to participate in third-party discovery in the Adversary Proceeding regarding the restricted or unrestricted nature of the RCBO Assets and the basis for any restriction. OPF will not assert that as a third-party, such discovery would be unduly burdensome, subject only to reserving the right to object to the number of custodians whose files must be searched in order to respond to the discovery. OPF agrees it will accept service of discovery in this Adversary Proceeding without a subpoena.

5. The Committee agrees to dismiss, without prejudice, the claims filed in the Adversary Proceeding solely as against OPF.

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NOW, THEREFORE, in consideration of the foregoing, the Committee moves to dismiss, without prejudice, the claims in the Adversary Proceeding as filed against OPF.

Dated: July 14, 2025

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