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

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 Adv. Proc. No. 24-04053 WJL **DECLARATION OF JASON I. BLANCHARD IN SUPPORT OF OBJECTION OF THE ROMAN CATHOLIC WELFARE CORPORATION OF OAKLAND, THE ROMAN CATHOLIC CEMETERIES OF THE DIOCESE OF OAKLAND AND ADVENTUS TO THE MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR RECONSIDERATION OF THE ORDER DISMISSING FIRST AMENDED ADVERSARY COMPLAINT** Date: September 9, 2025 Time: 10:00 a.m. (Pacific Time) Place: United States Bankruptcy Court Courtroom 220 1300 Clay Street Oakland, CA 94612
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, AND THE ROMAN CATHOLIC CEMETERIES OF THE DIOCESE OF OAKLAND, Defendants.	

DOCUMENT PREPARED ON RECYCLED PAPER

Case: 24-04053 Doc# 66 Filed: 08/27/25 Entered: 08/27/ 234052325082800000000002

I, Jason I. Blanchard, hereby declare as follows:

1. I am an attorney admitted to practice in the States of Texas, New York, and New Jersey and am admitted *pro hac vice* before this Bankruptcy Court. I am an attorney with the law firm of Norton Rose Fulbright US LLP, counsel to the Roman Catholic Welfare Corporation of Oakland ("RCWC"), the Roman Catholic Cemeteries of the Diocese of Oakland ("RCC"), and Adventus (collectively, the "Non-Debtor Defendants"), defendants in the above-captioned adversary proceeding.

2. I submit this Declaration in support of the Non-Debtor Defendants' objection (the ("Objection") to the motion filed by the Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland seeking reconsideration of the *Order Dismissing First Amended Adversary Complaint* [Adv. Docket No. 57].

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts cited by the Non-Debtor Defendants in the Objection of the transcript of the deposition of Mr. Attila Bardos as the designated representative for Adventus under Rule 30(b)(6) that was conducted on June 5, 2025.

I certify under penalty of perjury that the foregoing information is true and correct to the best of my knowledge, information and belief

Dated: August 27, 2025

By: */s/ Jason I. Blanchard*
Jason I. Blanchard

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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

----------X.

In Re: Case No. 23-40523

THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole,

Debtor.

Chapter 11

----------X.

DEPOSITION of ATTILA BARDOS

as 30(b)(6) witness for

The Oakland Parochial Fund and Adventus

June 5, 2025

9:05 a.m.

Reported Stenographically by:

Gail L. Inghram,

BA, RDR, CRR, RSA, CA-CSR No. 8635

WHEREUPON, the deposition of ATTILA BARDOS, as 30(b)(6) witness for Oakland Parochial Fund, was held at FOLEY & LARDNER LLP, 555 California Street, Suite 1700, San Francisco, California 94104 on Thursday, June 5, 2025, beginning at approximately 9:05 a.m., the proceedings being recorded stenographically by Gail Inghram, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Shorthand Reporter, and transcribed under her direction, there being present:

IN-PERSON APPEARANCES:

On behalf of The Official Committee of Unsecured Creditors:

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ALSO PRESENT:

BLAKE BOEHNE, Clyde & Co.

- - -

P R O C E E D I N G S

- - -

THE COURT REPORTER: Before we begin, my name is Gail Inghram. I'm California certified shorthand reporter Number 8635. Today's date is June 5, 2025.

Mr. Bardos, would you raise your right hand to be sworn, please.

WHEREUPON,

ATTILA BARDOS,

being first duly sworn or affirmed to testify to the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY ATTORNEY KAPLAN:

Q. Good morning, Mr. Bardos. We just met informally off the record, but for the record purposes, my name is Michael Kaplan, and I am counsel to the committee in the Roman Catholic Bishop of Oakland bankruptcy case. All right?

Just for record purposes today, we're taking your deposition in a number of capacities over the next coming days and otherwise. Today's

deposition, however, is limited to the fact that you have been designated as the corporate designee for Adventus, and for The Oakland Parochial Fund.

Do you understand?

A. Yes.

Q. Okay. And I don't have an acronym for Adventus, but for Oakland Parochial Fund I'll refer to it as "OPF."

Is that okay?

A. Perfect.

Q. Less words.

Have you ever had your deposition taken before?

A. No.

Q. Okay. Couple of things to talk about today at the beginning -- and we won't repeat this for when we separate Adventus and OPF -- but you're testifying under oath.

Do you understand that?

A. Yes.

Q. Has the same effect as in you're testifying in a court of law?

A. Yes.

Q. All of your answers today have to be

or certificates?

A. No.

Q. You are currently -- well, let me ask you this: What roles do you currently hold? By "roles," what jobs, titles or otherwise, do you currently hold?

A. I'm the CFO of the Diocese of Oakland.

Q. Okay. That one I knew: You're the chief financial officer of the debtor.

Do you hold any position with Adventus?

A. I do.

Q. Which is?

A. By virtue of my position, I'm a board member of Adventus.

Q. So by virtue of your position with the debtor?

A. CFO, ex officio, debtor.

Q. Okay. Is that -- the debtor always holds an ex officio spot with Adventus on the board?

A. My understanding is that, yes.

Q. Okay. And that is just as an ex officio board member?

A. That's my understanding, yes.

Q. Okay. Since December of 2024, has OPF paid the management fee?

A. No.

Q. Okay. Does OPF intend to pay the management fee?

A. Yes, OPF intends to do a midyear payment of the fee.

Q. For the first two quarters of 2025?

A. Correct.

Q. Okay. Other than the management fee, does OPF owe any other money to the debtor?

A. Not that I'm aware of.

Q. Okay. I think -- at this point, we're now -- we are done with OPF, okay? And we're going to talk about everything Adventus from this point forward. Okay?

A. I'm in.

Q. Excellent. I just want it to be crystal clear that it will be equally as complicated, but we are making the record clear that everything you answer from this point forward is as the corporate designee for Adventus. Okay?

A. Got it.

Q. All right. I promise next week will

A. That's okay.

Q. What is Adventus, sir?

A. Essentially, it's a real estate holding company.

Q. Who does it hold real estate for?

A. For entities within the Diocese of Oakland. It was designed for that.

Q. Does it do anything else?

A. No.

Q. Does it hold real estate for any other diocese in the country?

A. No.

Q. Is Adventus' business address the same as RCBO's?

A. I'd have to look, but I think so.

The incorporation document?

Q. I didn't give you the incorporation document.

A. Yeah, I'd have to verify what officially --

Q. That's okay. We'll look at some documents, and someone will tell me if I got it wrong.

What is the -- how do you describe the relationship between RCBO and Adventus?

A. It's a good relationship.

Q. Well, I'm sure it's a constructive working relationship, but if I were to try to understand from the lay perspective here, what is the -- how do the entities interact?

A. So Adventus is the real estate holding company, and there are properties there that Adventus has that are related to the diocese; and Adventus has conversations with RCBO about those properties.

Q. Does Adventus have any employees?

A. No.

Q. I understand.

I think at the beginning you told me that you are an ex officio board member of Adventus?

A. I am indeed.

Q. Who other -- who else holds a title at Adventus?

A. I would say that I believe -- I believe that Father Lawrence is also a board member. I'd have to look at the documents, but that's the only one that comes to mind.

Q. Does Adventus have a president or chief executive officer?

A. Not that I'm aware of.

Q. Okay. And I think I asked you this: It doesn't have any employees?

A. No employees. It's a real estate holding company.

Q. Okay. And are you aware -- can you think of anyone else besides you and Father D'Anjou who have a title at Adventus?

A. I'm sure -- well before my time when it was first incorporated, I'm sure there were more people named and involved and the board was more active then. It's been dormant lately.

Q. I guess my question is, as of May 2023, which is where we get into the real relevant time period here, was it at that time just Paul Bongiovanni and Father D'Anjou?

A. There could have been some other members still around that were part of it. I don't know.

Q. Okay. With respect to the real estate that Adventus holds for RCBO, who makes the decisions about that -- the real estate?

A. Can you -- can you clarify --

Q. So let's talk about there's -- it's no secret, and it was in the Bishop's deposition the

other day, where there was a discussion about the possibility of selling the property in Livermore.

A. Oh, yes, yes.

Q. Okay. That is -- the Livermore property is held by Adventus; correct?

A. Yes, correct.

Q. Who would make the decision to sell that property?

A. I would be the primary decision-maker on that, in conjunction with the Bishop and Father Lawrence.

Q. In what capacity?

A. Gotcha, okay. As -- in my Adventus capacity, I would make a decision on which properties within Adventus are available to contribute to the settlement.

Q. I'm not worried about contributing to the settlement. I'm talking just generally speaking here --

A. I thought you were referring to the Bishop's discussion.

Q. I was but not -- not in that sense. There was -- I was referring to there was a -- there was a document that had nothing to do with the case prior to it wherein it was the Bishop --

I think, it was the finance council meeting where the Bishop had said that he had approved the selling of that property.

Is the Bishop the ultimate say on if properties get sold?

A. Not the only say, but he's the ultimate decision-maker, yes.

Q. My question here is -- let me ask you this way.

How many properties does Adventus currently hold?

A. Three.

Q. Okay. One is Livermore?

A. Yes.

Q. I know there's a full address to it. Is there only one in Livermore?

A. Yes.

Q. What are the other two?

A. There's a house, a rectory, in Byron that serves as the rectory for St. Anne's.

And there is a house -- and I'd have to look at Schedule 18, but I believe it's in Hayward or Castro Valley. There's a house there as well.

Q. So Adventus holds three total

Adventus working with?

A. A real estate attorney and consulting firm.

Q. Do you know --

A. I'd have to look -- I'm sorry. I jumped.

Q. Don't worry about it. You're doing fine. Should we take five minutes? We're doing okay?

ATTORNEY KAPLAN: Let's take five minutes. Off the record.

(Recess taken from 11:00 a.m. to 11:10 a.m., during which Mr. Matthew Lee was replaced in the deposition proceedings by Mr. J. Michael Thomas.)

BY ATTORNEY KAPLAN:

Q. Let me turn back to one -- I think I may have asked this, but I want to make sure I did.

Adventus has only ever held property that belonged to RCBO; correct?

A. I wouldn't say that.

Q. Okay. Has -- does Adventus hold property that belongs to entities other than RCBO?

A. Not that I'm aware of.
Q. Okay.
A. Not that I'm aware of.
Q. All right. For instance does Adventus hold any properties that are owned by RCC?
A. No.
Q. How about RCWC?
A. No.
Q. Now, this is one of those little bit tricky questions, but it's one of our topics, the negotiation of the plan.
Was Adventus consulted in the negotiations of the Third Amended Plan?
A. Yes.
Q. How so?
A. It was in relation to Adventus contributing to the plan with the Livermore property.
Q. I want to be very specific because I don't want to talk -- there's prior versions of the plan.
Third Amended Plan that's on file now, is Adventus contributing the Livermore property to that plan?
A. No. We were told the survivors didn't

to 800,000.

Q. Okay. Has the final decision been made with respect to either of those two properties to use that as collateral for the exit facility?

A. They're being considered.

Q. Again, my question --

A. No final decision.

Q. Okay. Outside -- again, from your Adventus hat here -- outside of the potential contribution of the properties that Adventus holds, is Adventus making any other contribution to the plan?

A. No.

Q. Okay. Was Adventus ever asked to make any other contribution to the plan?

A. No.

Q. As your counsel just indicated, there was a prior version of the plan in which Adventus was going to contribute the Livermore property to the survivors' trust; correct?

A. That is correct.

Q. What benefit would Adventus have received for that transfer?

A. Helping to get a settlement faster.

It helps everybody.

Q. Okay. When you say "helping to get a settlement faster," that is the settlement for RCBO?

A. Yes.

Q. Okay. Was Adventus -- was there any direct benefit to Adventus?

A. Doing a good deed. Yes.

Q. Okay.

A. For the greater good.

Q. Does Adventus have -- well, Adventus has its own bank accounts; correct?

A. Yes.

Q. Are they -- what institution holds those?

A. I believe we have that with US Bank -- I'd have to check. I think it's US Bank. I'd have to check.

Q. Do you know, sitting here today, how much cash Adventus has in its accounts?

A. No, I don't. I'd have to look at documents.

Q. Do you have a general estimate of what it holds on a regular basis?

A. No.