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Attorneys for Defendants
American Home Assurance Co.
and Lexington Insurance Co.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re:
 THE ROMAN CATHOLIC BISHOP OF
 OAKLAND, a California corporation sole,
 Debtor.

THE ROMAN CATHOLIC BISHOP OF
 OAKLAND,
 Plaintiff,

v.

AMERICAN HOME ASSURANCE CO., a
 New York corporation; LEXINGTON
 INSURANCE CO., a Delaware corporation
 Defendants.

CHAPTER 11

Case No. 23-40523 WJL

Adversary Case No. 23-04037

**STIPULATION FOR EXTENSION OF
 TIME TO RESPOND TO FIRST
 AMENDED COMPLAINT FOR BREACH
 OF CONTRACT AND DECLARATORY
 JUDGMENT RELIEF**

STATUS CONFERENCE:

Date: February 7, 2024

Time: 10:30 a.m.

Place: United States Bankruptcy Court
 1300 Clay Street
 Courtroom 220
 Oakland, CA 94612

1 **TO THE HONORABLE COURT, AND TO ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 **WHEREAS**, on May 8, 2023, The Roman Catholic Bishop of Oakland (“Debtor”) filed
4 a voluntary petition for relief under Title 11 of the United States Code.

5 **WHEREAS**, on August 30, 2023, the Debtor filed its Complaint for Breach of Contract
6 and Declaratory Relief (“Complaint”), naming American Home Assurance Company and
7 Lexington Company as defendants (collectively, “Defendants”).

8 **WHEREAS**, on August 31, 2023, the Clerk of the Court issued a Summons and Notice
9 of Scheduling Conference in an Adversary Proceeding (“Summons”).

10 **WHEREAS**, on September 14, 2023, the Summons and Complaint were served.

11 **WHEREAS**, on December 19, 2023, the Debtor filed its First Amended Complaint for
12 Breach of Contract and Declaratory Judgment Relief (“FAC”).

13 **WHEREAS**, the Debtor has agreed to an extension of time for the Defendants to file and
14 serve their written response to the FAC until January 18, 2024.

15 **NOW, THEREFORE**, in consideration of the foregoing, the parties hereto, by and
16 through their attorneys of record, hereby agreed and stipulate as follows:

- 17 1. The deadline for filing Defendants’ answer or other responses to the FAC shall be
18 extended to January 18, 2024.
- 19 2. Nothing herein shall constitute a waiver of any defense that the Defendants may have
20 to any claim against them, including any defense related to jurisdiction over the
21 Defendants.

22 Dated: January 9, 2024

Dated: January 9, 2024

23 NICOLAIDES FINK THORPE
24 MICHAELIDES SULLIVAN LLP

BREALL & BREALL, LLP

25 By: /s/ Alison V. Lippa
26 Alison V. Lippa
27 American Home Assurance Co.
28 and Lexington Insurance Co.

By: /s/ Joseph M. Breall
Joseph M. Breall
Proposed Special Insurance Counsel for
Debtor, The Roman Catholic Bishop of
Oakland