

Alison V. Lippa (SBN: 160807)  
 alippa@nicolaidesllp.com  
 NICOLAIDES FINK THORPE  
 MICHAELIDES SULLIVAN LLP  
 101 Montgomery Street, Suite 2300  
 San Francisco, CA 94104  
 Telephone: (415) 745-3770  
 Facsimile: (415) 745-3771

Amy P. Klie (*Admitted Pro Hac Vice*)  
 aklie@nicolaidesllp.com  
 NICOLAIDES FINK THORPE  
 MICHAELIDES SULLIVAN LLP  
 10 S. Wacker Dr., Suite 2100  
 Chicago, Illinois 60606  
 Telephone: (312) 585-1400

*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 26, 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 26, 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 19, 2024

Dated: January 19, 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.  
and Lexington Insurance Co.

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