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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.

Chapter 11

Case No: 23-40523 WJL

Hon. William J. Lafferty III

THE ROMAN CATHOLIC BISHOP OF  
 OAKLAND,

Plaintiff,

PACIFIC INDEMNITY, a Delaware  
 corporation; *et al.*

Defendants.

Adversary Case No. 23-04028 WJL

**OFFICIAL COMMITTEE OF  
 UNSECURED CREDITORS' JOINDER  
 TO DEBTOR'S OPPOSITION TO CIGA'S  
 MOTION TO DISMISS OR FOR A MORE  
 DEFINITE STATEMENT**



1           The Official Committee of Unsecured Creditors (the “Committee”) files this joinder (the  
2 “Joinder”) to *Debtor’s Opposition to Motion of Defendant California Insurance Guarantee*  
3 *Association to Dismiss Third Amended Adversarial Complaint Under Federal Rules of Civil*  
4 *Procedure, Rule 12(b)(6) or Alternatively for a More Definite Statement Under Federal Rule of*  
5 *Civil Procedure, Rule 12(e)* [Dkt. 202] (the “Opposition”). In support of this Joinder, the  
6 Committee states as follows:

7           1.       The Committee incorporates by reference and hereby joins in the arguments set  
8 forth in the Opposition.

9           2.       The Committee requests that the Court deny the *Motion of Defendant California*  
10 *Insurance Guarantee Association to Dismiss Third Amended Adversarial Complaint Under*  
11 *Federal Rules of Civil Procedure, Rule 12(b)(6) or Alternatively for a More Definite Statement*  
12 *Under Federal Rule of Civil Procedure, Rule 12(e)* [Dkt. 167] (the “Motion”).

13           3.       As the Committee explained in its opposition to the original motions to dismiss  
14 brought by certain other insurance companies [Dkt. 114], it is essential that all parties to the  
15 insurance dispute—including, in this case, the California Insurance Guarantee Association—be  
16 part of the insurance adversary proceeding so that coverage issues applicable to all insurers can be  
17 adjudicated in a comprehensive and organized manner.

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1           4.       The Committee reserves its right to supplement this Joinder, to file a more fulsome  
2 pleading in opposition to the Motion, and to participate in any hearing to consider the Motion.  
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4 Dated: March 5, 2024

**LOWENSTEIN SANDLER LLP**  
**KELLER BENVENUTTI KIM LLP**

By: /s/ Gabrielle L. Albert

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- and -

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