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*Counsel for the Official Committee of Unsecured
Creditors***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

**STIPULATION AND AGREEMENT
FOR ORDER TO CONTINUE APRIL 17,
2024 HEARING**

Judge: Hon. William J. Lafferty

Date: April 26, 2024

Time: 10:00 a.m. (Pacific Time)

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

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by the Official Committee of Unsecured Creditors of The Roman Catholic Bishop of
3 Oakland (the “**Committee**”) and Certain Underwriters at Lloyd’s, London, subscribing severally
4 and not jointly Slip Nos. CU 1001 and K 66034 issued to the Roman Catholic Bishop of Oakland
5 (collectively, “**London Market Insurers**” or “**LMI**”), American Home Assurance Co.
6 (“**American Home**”), and Westport Insurance Corporation, formerly known as Employers
7 Reinsurance Corporation (“**Westport**”). The Committee, LMI, American Home, and Westport are
8 referred to in this Stipulation and Agreement for Order as the “**Parties**,” and each as a “**Party**.”
9 The Parties hereby stipulate as follows:

10 **WHEREAS**, the following motions, referred to in this Stipulation and Agreement for Order
11 collectively as the “**Motions**”, were filed and are scheduled for hearing on April 17, 2024, at 10:30
12 a.m.:

- 13 • *LMI’s Motion for Stay Pending Appeal of Order Granting the Official Committee of*
14 *Unsecured Creditors’ Ex Parte Application for Federal Rule of Bankruptcy Procedure*
2004 Examination of Insurers filed by LMI [Dkt. 907];
- 15 • *Certain Underwriters at Lloyd’s, London, Subscribing Severally and Not Jointly to Slip*
16 *Nos. CU 1001 and K 66034 Issued to the Roman Catholic Bishop of San Francisco, and*
17 *Nos. K 78138 and CU 3061 Issued to the Roman Catholic Bishop of Oakland’s Motion*
for Protective Order; Memorandum of Points and Authorities in Support of Motion for
Protective Order filed by LMI [Dkt. 918];
- 18 • *American Home Assurance Company’s Motion to Quash the Official Committee of*
19 *Unsecured Creditors’ Subpoena for Rule 2004 Examination or in the Alternative for a*
20 *Protective Order; Memorandum of Law in Support Thereof* filed by American Home
[Dkt. 920];
- 21 • *Motion for Protective Order; Memorandum of Law in Support Thereof* filed by
Westport [Dkt. 978];
- 22 • *LMI’s Motion to Quash and/or Modify the Subpoena Issued by The Official Committee*
23 *of Unsecured Creditors Served in Connection with the Chapter 11 Case Filed by the*
24 *Roman Catholic Bishop of Oakland Pursuant to the Stipulation Consent Order to*
Transfer Action and LMI’s Motion to Quash and/or Modify the Subpoena filed by LMI
[Dkt. 992]; and
- 25 • *Motion of Official Committee of Unsecured Creditors to Enforce the Rule 2004 Order*
26 *and Compel Compliance with Subpoenas* filed by the Committee [Dkt. 996].

27 **WHEREAS**, the Parties have agreed to continue the hearing on the Motions to April 26,
28 2024 at 10:00 a.m. (the “**Continued Hearing**”).

WHEREAS, the Parties have agreed to a status conference on April 10, 2024, at 10:30 a.m. (the “**Status Conference**”) regarding the Continued Hearing.

WHEREAS, the Parties have agreed that the deadline for the Parties to object to the Motions will be April 12, 2024.

WHEREAS, the Parties have agreed that the deadline for the Parties to reply to objections to the Motions will be April 19, 2024.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT SUBSTANTIALLY IN THE FORM ATTACHED HERETO AS EXHIBIT A:

The Court hold the Status Conference on April 10, 2024 at 10:30 a.m.;

The deadline for the Parties to object to the Motions is April 12, 2024;

The deadline for the Parties to reply to objections to the Motions is April 19, 2024; and

The Court will hold the Continued Hearing on the Motions on April 26, 2024 at 10:00 a.m.

[Signatures on Following Page]

1 Dated: March 29, 2024

2 LOWENSTEIN SANDLER LLP
3 KELLER BENVENUTTI KIM LLP

4 /s/ 
5 Gabrielle L. Albert
6 *Counsel for the Official Committee of*
7 *Unsecured Creditors*

9 Dated: March 29, 2024

10 PARKER HUDSON RAINER &
11 DOBBS LLP

12 /s/
13 Todd C. Jacobs
14 *Counsel for Westport Insurance*
15 *Corporation, formerly known as*
16 *Employers Reinsurance Corporation*

Dated: March 29, 2024

DUANE MORRIS, LLP

/s/
Russell W. Roten
Counsel for Certain Underwriters at
Lloyd's, London, subscribing severally
and not jointly to Slip Nos. CU 1001 and
K 66034 issued to the Roman Catholic
Archbishop of San Francisco, and Nos. K
78138 and CU 3061 issued to the Roman
Catholic Bishop of Oakland

Dated: March 29, 2024

NICOLAIDES FINK THORPE
MICHAELIDES SULLIVAN LLP

/s/
Alison V. Lippa
Counsel for Defendants American Home
Assurance Co.

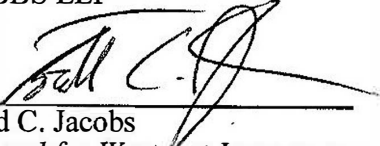
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NICOLAIDES FINK THORPE
MICHAELIDES SULLIVAN LLP

/s/
Alison V. Lippa
Counsel for Defendants American Home
Assurance Co.

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4 /s/
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6 *Counsel for the Official Committee of*
7 *Unsecured Creditors*

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MICHAELIDES SULLIVAN LLP

/s/ 
Alison V. Lippa
Counsel for Defendants American Home
Assurance Co.

1 Dated: March 29, 2024

Dated: March 29, 2024

2 LOWENSTEIN SANDLER LLP
3 KELLER BENVENUTTI KIM LLP

DUANE MORRIS, LLP

4 /s/
Gabrielle L. Albert
5 *Counsel for the Official Committee of*
6 *Unsecured Creditors*

/s/ Betty Luu
Russell W. Roten
Betty Luu
Counsel for Certain Underwriters at
Lloyd's, London, subscribing severally
and not jointly to Slip Nos. CU 1001 and
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MICHAELIDES SULLIVAN LLP

12 /s/
13 Todd C. Jacobs
14 *Counsel for Westport Insurance*
15 *Corporation, formerly known as*
Employers Reinsurance Corporation

/s/
Alison V. Lippa
Counsel for Defendants American Home
Assurance Co.

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Exhibit A
(Proposed Order)

LOWENSTEIN SANDLER LLP

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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

**[PROPOSED] ORDER APPROVING
STIPULATION AND AGREEMENT
FOR ORDER TO CONTINUE APRIL 17,
2024 HEARING**

Judge: Hon. William J. Lafferty

Date: April 26, 2024

Time: 10:00 a.m. (Pacific Time)

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

1
2 The Court having considered the *Stipulation and Agreement for Order to Continue April*
3 *17, 2024 Hearing* (the “**Stipulation**”)¹ [Dkt. No. •], filed on March 29, 2024; and, pursuant to such
4 stipulation and agreement of the Parties, and good cause appearing,

5 **IT IS HEREBY ORDERED:**

6 1. The Court will hold the Status Conference regarding the Continued Hearing on April
7 10, 2024 at 10:30 a.m.;

8 2. The deadline for the Parties to object to the Motions is April 12, 2024;

9 3. The deadline for the Parties to reply to objections to the Motions is April 19, 2024;
10 and

11 4. The Court will hold the Continued Hearing on the Motions on April 26, 2024 at
12 10:00 a.m.

13 ****END OF ORDER****
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28 ¹ Capitalized terms not otherwise defined shall have the meaning ascribed to them in the Stipulation.