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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

**STIPULATION AND AGREEMENT
 FOR ORDER TO CONTINUE
 HEARING TO MAY 22, 2024**

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 Continental Casualty Company (“**Continental**”), Travelers
4 Casualty & Surety Company f/k/a Aetna Casualty & Surety Company (“**Travelers**”) and United
5 States Fire Insurance (“**U.S. Fire**” and, with Continental and Travelers, the “**Insurer Parties**”).
6 The Committee, Continental, Travelers and U.S. Fire are referred to in this Stipulation and
7 Agreement for Order as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate as
8 follows:

9 **WHEREAS**, the Committee filed the *Motion of Official Committee of Unsecured Creditors*
10 *to Enforce the Rule 2004 Order and Compel Compliance with Subpoenas* [Dkt. 996] (the
11 “**Motion**”) which is scheduled to be heard on April 26, 2024 at 10:00 a.m. (the “**Hearing**”) seeking
12 compliance from six parties including the Insurer Parties.

13 **WHEREAS**, the Parties have agreed to continue the Hearing on the Motion with respect to
14 Continental, Travelers and U.S. Fire until May 22, 2024 at 10:30 a.m. (the “**Continued Hearing**”).
15 The Hearing will proceed as it relates to the non-Insurer Parties on April 26, 2024.

16 **WHEREAS**, the Parties have agreed that they will not discuss the Motion as it pertains to
17 Continental, Travelers and U.S. Fire at the Hearing on April 26, 2024.

18 **WHEREAS**, the Parties have agreed that the deadline for the Insurer Parties to object to
19 the Motion will be May 8, 2024.

20 **WHEREAS**, the Parties have agreed that the deadline for the Parties to reply to objections
21 to the Motion will be May 15, 2024.

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

27 The deadline for the Insurer Parties to object to the Motion is May 8, 2024;

28 The deadline for the Committee to reply to objections to the Motion is May 15, 2024; and

1 The Court will hold the Continued Hearing on the Motion as it pertains to the Insurer Parties
2 on May 22, 2024 at 10:30 a.m.

3
4 Dated: April 10, 2024

5 LOWENSTEIN SANDLER LLP
6 KELLER BENVENUTTI KIM LLP

7 /s/ Gabrielle L. Albert
8 Gabrielle L. Albert
9 Counsel for the Official Committee of
Unsecured Creditors

10 Dated: April 10, 2024

11 CROWELL & MORING LLP

12
13 /s/ Mark D. Plevin
14 Mark D. Plevin
15 Miranda H. Turner
16 Jordan A. Hess
Counsel for Continental Casualty
Company

Dated: April 10, 2024

KENNEDY LAW LLP

/s/ Travis Wall
Travis Wall
Jillian G. Dennehy
Counsel for United States Fire Insurance

Dated: April 10, 2024

DENTONS US LLP

/s/ Joshua Haeavernick
Joshua Haeavernick
John Grossbart
Patrick C. Maxcy
Jacob S. Margolies
Lauren Macksoud
Counsel for Travelers Casualty & Surety
Company f/k/a Aetna Casualty & Surety
Company

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Exhibit A
(Proposed Order)

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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

**[PROPOSED] ORDER APPROVING
STIPULATION AND AGREEMENT
FOR ORDER TO CONTINUE
HEARING TO MAY 22, 2024**

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 The Court having considered the *Stipulation and Agreement for Order to Continue Hearing*
2 *to May 22, 2024* (the “**Stipulation**”)¹ [Dkt. No. ____], filed on April 10, 2024; and, pursuant to such
3 stipulation and agreement of the Parties, and good cause appearing,

4 **IT IS HEREBY ORDERED:**

- 5 1. The deadline for the Insurer Parties to object to the Motion is May 8, 2024;
- 6 2. The deadline for the Committee to reply to objections to the Motion is May 15,
7 2024; and
- 8 3. The Court will hold the Continued Hearing on the Motions on May 22, 2024 at 10:30
9 a.m.

10 ****END OF ORDER****

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¹ Capitalized terms not otherwise defined shall have the meaning ascribed to them in the Stipulation.

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Court Service List

All registered ECF participants.