

PAUL J. PASCUZZI, State Bar No. 148810
 JASON E. RIOS, State Bar No. 190086
 THOMAS R. PHINNEY, State Bar No. 159435
 FELDERSTEIN FITZGERALD
 WILLOUGHBY PASCUZZI & RIOS LLP
 500 Capitol Mall, Suite 2250
 Sacramento, CA 95814
 Telephone: (916) 329-7400
 Email: ppascuzzi@ffwplaw.com
 jrios@ffwplaw.com
 tphinney@ffwplaw.com

ORI KATZ, State Bar No. 209561
 ALAN H. MARTIN, State Bar No. 132301
 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
 A Limited Liability Partnership
 Including Professional Corporations
 Four Embarcadero Center, 17th Floor
 San Francisco, California 94111-4109
 Telephone: (415) 434-9100
 Email: okatz@sheppardmullin.com
 amartin@sheppardmullin.com

Proposed Attorneys for The Roman Catholic
 Bishop of Sacramento

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO DIVISION

In re:

THE ROMAN CATHOLIC BISHOP OF
 SACRAMENTO,

Debtor-In-Possession.

Case No. 24-21326

Chapter 11

DCN: FWP-1 (App for Order Shortening Time)
 FWP-2 (Cash Management)
 FWP-3 (Payroll)
 FWP-4 (Insurance)
 FWP-5 (Utilities)
 FWP-6 (Limit Notice)
 FWP-7 (Survivor Assistance)
 FWP-8 (Claims and Noticing Agent)

Date: April 4, 2024

Time: 10:00 a.m.

Location: Courtroom 35 (Dept. C)

Judge: Hon. Christopher M. Klein

Order Shortening Time

**OMNIBUS NOTICE OF HEARING
 ON DEBTOR IN POSSESSION'S FIRST-DAY MOTIONS**

1 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that that The Roman Catholic Bishop of Sacramento, a
3 California corporation sole, the debtor in possession (“RCBS” or “Debtor in Possession”), in the
4 above-captioned bankruptcy case (the “Bankruptcy Case”) has filed eight motions seeking
5 immediate relief. These eight critical motions (hereafter referred to collectively as the “First-Day
6 Motions”) seek entry of orders granting the relief described below, and such other relief as is just
7 and appropriate. A summary of each First-Day Motion and the relief sought is set forth below.

8 **NOTICE IS FURTHER GIVEN** that pursuant to an order of the Court shortening time,
9 hearings on the First-Day Motions are scheduled for **April 4, 2024 at 10:00 a.m.** (the “First-Day
10 Hearings”), in the Courtroom of the Honorable Christopher M. Klein, United States Bankruptcy
11 Judge, 501 I Street, Courtroom 35 (Department C), Sacramento, California, 95814, at which
12 hearings the Court will hear and consider approval of the First Day Motions. Opposition and
13 comments, if any may be made at the First Day Hearing. If you do not want the Court to grant the
14 relief sought in the First Day Motions, or if you want the Court to consider your views on the First-
15 Day Motions, then you should appear at the First-Day Hearings to state your views. You may also
16 file and serve written opposition in advance of the First-Day Hearings.

17 **NOTICE IS FURTHER GIVEN** that all matters will be conducted simultaneously: (1) In
18 Person, at Sacramento Courtroom #35, (2) via ZoomGov Video, (3) via ZoomGov Telephone, and
19 (4) via CourtCall. You may choose any of these options. Parties who wish to appear at a hearing
20 remotely should sign up by 4:00 p.m. one business day prior to the hearing. Information regarding
21 how to sign up can be found on the Remote Appearances page of the court’s website at
22 <https://www.caeb.uscourts.gov/Calendar/RemoteAppearances>. Each party who has signed up will
23 receive a Zoom link or phone number, meeting I.D., and password via e-mail. If the deadline to
24 sign up has passed, parties who wish to appear remotely must contact the Courtroom Deputy for
25 the Department holding the hearing. Telephonic appearances may be arranged at least 24 hours in
26 advance of calendared hearings through court conference at 1-866-582-6878.

27 The First Day Motions are supported by the *Declaration of Thomas McNamara in Support*
28 *of Chapter 11 Petition and First Day Motions* (“McNamara Background Decl.”), the *Declaration*

1 of Stephen J. Greene in Support of Chapter 11 Petition and First Day Motions (“Greene Decl.”),
2 and the additional declarations of Thomas McNamara in support of each motion. The First Day
3 Motions are filed and served herewith. Filed motion papers can also be obtained for free from the
4 website maintained by Donlin Recano, the Debtor’s Claims and Noticing Agent for the Debtor in
5 Possession, at this web address: <https://www.donlinrecano.com/rcbsacramento>. The titles of each
6 of the First Day Motions followed by a summary description of the relief requested in each First
7 Day Motion, are as follows:

8 **I. (FWP-1) APPLICATION FOR ORDER: (1) MODIFYING L.B.R. 9014-1(d) TO**
9 **ALLOW THE FILING AND SERVICE OF AN OMNIBUS NOTICE FOR THE**
10 **FIRST-DAY MOTIONS; (2) SHORTENING THE TIME PERIOD FOR NOTICE**
11 **WITH RESPECT TO THE FIRST-DAY MOTIONS; AND (3) MODIFYING L.B.R.**
12 **9014-1(d)(5) TO ALLOW REQUESTS FOR RELIEF TO BE JOINED IN A SINGLE**
13 **MOTION**

14 The Debtor in Possession applies for an Order: (1) modifying Local Bankruptcy Rule
15 (L.B.R.) 9014-1(d) to allow the filing and service of an omnibus notice for the first-day motions
16 (the “First-Day Motions”) to be filed by the Debtor in Possession; (2) shortening the time period
17 for notice and setting the First Day Motions for hearing (the “Hearing”) **on the first week of April**,
18 preferably April 4, 2024; such that, service of all documents for the First-Day Motions on the 20
19 largest unsecured creditors, the secured creditors if any, the Office of the United States Trustee, the
20 Internal Revenue Service, corresponding state agencies, as well as other governmental agencies, to
21 the extent required by the Bankruptcy Rules and the Local Rules for the United States Bankruptcy
22 Court for the Eastern District of California, and those persons who have formally appeared and
23 requested service in this case pursuant to Bankruptcy Rule 2002, by email, facsimile, mail, or
24 overnight delivery, by **April 2, 2024** shall be deemed sufficient to have the matter heard at the
25 Hearing; and (3) modifying L.B.R. 9014-1(d)(5) to allow requests for relief to be joined in a single
26 motion.

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1 **II. (FWP-2) DEBTOR IN POSSESSION’S EMERGENCY MOTION FOR INTERIM**
2 **AND FINAL ORDERS (1) AUTHORIZING CONTINUED USE OF EXISTING**
3 **CASH MANAGEMENT SYSTEM, OPERATIONAL BANK ACCOUNTS AND**
4 **RELATED INVESTMENT ACCOUNTS; (2) AUTHORIZING MAINTENANCE OF**
5 **EXISTING BUSINESS FORMS, (3) EXCUSING COMPLIANCE WITH SECTION**
6 **345(b); (4) AUTHORIZING CONTINUED USE OF CURRENT INVESTMENT**
7 **POLICY; AND (5) SCHEDULING A FINAL HEARING**

8 1. The Debtor in Possession moves the Court for entry of an interim and final order:
9 (1) authorizing the continued use of existing cash management system, operational bank accounts
10 and related investment accounts; (2) authorizing the maintenance of existing business forms, (3)
11 excusing compliance with section 345(b); (4) authorizing continued use of current investment
12 policy; and (5) scheduling a Final Hearing (the “Cash Management Motion”).

13 2. By the Cash Management Motion, the Debtor in Possession seeks, *inter alia*, entry
14 of an order: (a) waiving the Bankruptcy Local Rules and United States Trustee Guidelines (“UST
15 Guidelines”) to the extent necessary in order for the Debtor in Possession to continue its use of its
16 existing cash management system, (b) authorizing the Debtor in Possession to continue using, as
17 needed, its prepetition Bank Accounts (defined below) and business forms, including a waiver of
18 the requirement that the legend “debtor in possession” be imprinted on any existing checks and
19 business forms, and (c) authorizing the Debtor in Possession to continue the use of its existing cash
20 management system and accounting policies and practices. The Debtor in Possession also seeks to
21 continue using its commercial pre-funded credit cards, debit cards, and investment policies during
22 this Bankruptcy Case, without posting any bonds as required under section 345(b) of the Bankruptcy
23 Code. The Debtor in Possession seeks this authorization to ensure its orderly transition into
24 bankruptcy and to help administer its operations efficiently while avoiding the disruptions,
25 distractions, delays, and significant expense that otherwise would inevitably divert the Debtor in
26 Possession’s attention from urgent matters during the initial stages of its bankruptcy case.

27 3. As described in the Cash Management Motion, all of the relevant banks where the
28 RCBS’s bank accounts (the “Bank Accounts”) are located are FDIC-insured banking institutions
that have complied with the United States Trustee’s (the “U.S. Trustee”) special depository
procedures under Bankruptcy Code section 345 and are on the U.S. Trustee’s list of authorized

1 depositories for the Eastern District of California. The Debtor in Possession will use its best efforts
2 to have these accounts designated as “Debtor in Possession” to the extent possible by the relevant
3 banks.

4 4. The Debtor in Possession also has certain investment, money market, and certificate
5 deposit accounts (the “Investment Accounts”) that the Debtor in Possession requests Court authority
6 to continue to maintain without the need to comply strictly with Bankruptcy Code Section 345: its
7 Christian Brothers Investment Services, Inc. (“CBIS Accounts”), its Merrill Lynch Investment
8 Accounts, and its River City Bank CD Account. These Investment Accounts yield between 0% and
9 20% per year.

10 5. The RCBS’s current cash management system has been in place substantially in its
11 current form for the last 25 years. The RCBS has implemented the cash management system
12 described in the Cash Management Motion to ensure the orderly management of the RCBS’s
13 operations. Due to the complicated nature of the RCBS’s cash management system, the Debtor in
14 Possession respectfully requests that it be authorized to continue to operate the cash management
15 system in the ordinary course of business.

16 **III. (FWP-3) MOTION FOR ORDER: (1) AUTHORIZING PAYMENT OF**
17 **PREPETITION WAGES, SALARIES, AND EMPLOYEE EXPENSES; (2) TO PAY**
18 **ACCRUED EMPLOYEE BENEFITS AND TAXES; AND (3) DIRECTING BANKS**
TO HONOR PAYROLL AND EXPENSE CHECKS

19 1. The Debtor in Possession moves the Court for entry of an order: (1) authorizing the
20 Debtor in Possession to pay prepetition wages, salaries and employee expenses, (2) authorizing the
21 Debtor in Possession to pay accrued employee benefits and taxes, and (3) directing banks to honor
22 payroll and expense reimbursement checks (the “Payroll Motion”).

23 2. By the Payroll Motion, the Debtor in Possession requests entry of an order that: (i)
24 authorizes but does not direct the Debtor in Possession to pay Employee Obligations, Employee
25 Deductions and Employee Expenses (each as defined in the Payroll Motion); (ii) authorizes but does
26 not direct the Debtor in Possession to continue its practices, programs and policies in effect as of the
27 Petition Date with respect to all Employee Obligations (including allowing employees to use paid
28 time off accrued, but unused, as of the Petition Date), Employee Deductions and Employee

1 Expenses; and (iii) authorizes and directs the bank at which the Debtor in Possession maintains an
2 account from which the Debtor in Possession's payroll obligations are disbursed and all other banks
3 or lending institutions maintaining payroll and employee benefits accounts, to honor and pay all pre-
4 petition and post-petition checks issued or to be issued and fund transfers requested or to be
5 requested, by the Debtor in Possession in respect of the Employee Obligations, Employee
6 Deductions and Employee Expenses.

7 3. The Debtor in Possession also seeks authority to issue new post-petition checks or
8 fund transfer requests with respect to pre-petition obligations that may have been dishonored by the
9 banks relating to the Employee Obligations, Employee Deductions and Employee Expenses, if
10 necessary.

11 4. The Payroll Motion seeks authorization to pay employees only such amounts that
12 are entitled to priority claim status up to \$15,150 under the provisions of Bankruptcy Code sections
13 507(a)(4) and (a)(5). The RCBS believes that approval of the Payroll Motion is critical to the Debtor
14 in Possession's operations, and that the amounts at issue are fairly de minimis in the context of the
15 Bankruptcy Case.

16 5. The RCBS has approximately 63 full-time and 37 part-time lay employees, and 9
17 clergy. The Debtor in Possession does not believe that it will have any accrued and unpaid pre-
18 petition payroll as of the Petition Date, and projects that if there are such unpaid amounts they would
19 not exceed \$30,000. The Debtor in Possession projects it will have approximately \$325,000 in
20 accrued and unpaid vacation pay entitled to priority that the Debtor in Possession intends to pay its
21 employees in the future based upon their respective accruals as such time is taken. The Debtor in
22 Possession further seeks authority to continue other employee benefits, including health, dental,
23 vision and retirement, which RCBS believes are current.

24 **IV. (FWP-4) DEBTOR IN POSSESSION'S EMERGENCY MOTION TO CONTINUE** 25 **INSURANCE PROGRAMS**

26 1. The Debtor in Possession moves the Court for authority to continue its insurance
27 programs ("Insurance Motion").

28 2. By the Insurance Motion, the Debtor in Possession requests entry of the Proposed

1 Order, pursuant to sections 363, 1112(b), and 105 of the Bankruptcy Code, authorizing the Debtor
2 in Possession in the ordinary course of business to: (i) continue administering the Insurance
3 Programs (as defined in the Insurance Motion) for the Debtor in Possession and Insurance
4 Participating Entities (as defined in the Insurance Motion) in the ordinary course of business
5 consistent with past practices; (ii) continue funding all premiums, deductibles, reserves, claims
6 administration costs, loss prevention costs, and service fees related to Insurance Coverage and
7 receiving reimbursement for same; (iii) renew, amend, supplement, extend, purchase, or terminate
8 Insurance Coverage in the ordinary course of business; and (iv) pay any and all amounts related to
9 the Insurance Programs that remained unpaid on the Petition Date; *provided, however*, that no claims
10 arising from, or in connection with, alleged pre-petition sexual misconduct may be paid other than
11 pursuant to the terms of a confirmed reorganization plan or pursuant to further order of this Court.

12 3. As described in the declaration filed in support of the Insurance Motion, the
13 Insurance Programs provide a cost-effective way to procure necessary insurance for the Debtor in
14 Possession and the Insurance Participating Entities. In light of the requirements under the
15 Bankruptcy Code, including the operating guidelines issued by the United States Trustee, the Debtor
16 in Possession submits that permitting it to maintain its Insurance Coverage is essential to its estate.

17 **V. (FWP-5) DEBTOR IN POSSESSION’S EMERGENCY MOTION FOR INTERIM**
18 **AND FINAL ORDERS (1) PROHIBITING UTILITY COMPANIES FROM**
19 **ALTERING, REFUSING OR DISCONTINUING SERVICE, (2) DETERMINING**
20 **ADEQUATE ASSURANCE OF PAYMENT FOR POST-PETITION UTILITY**
21 **SERVICES UNDER 11 U.S.C. § 366, (3) ESTABLISHING PROCEDURES FOR**
22 **DETERMINING ADEQUATE ASSURANCE OF PAYMENT, AND (4)**
23 **SCHEDULING A FINAL HEARING**

24 1. The Debtor in Possession moves the Court for entry of an order, after an interim
25 hearing: (1) prohibiting utility companies from altering, refusing or discontinuing service; (2)
26 determining that the Debtor in Possession’s furnishing of deposits to Utility Companies (defined in
27 the Utility Motion) constitutes adequate assurance of payment; (3) establishing procedures for
28 providing or determining adequate assurance of payment in response to requests from the affected
utilities; and (4) scheduling a final hearing thereon (the, “Utility Motion”).

2. The Debtor in Possession has multiple facilities and receives utility services from

1 numerous utility companies. Submitted in support of the Utility Motion is a table listing (a) the
2 utility companies (as defined in the Utility Motion); (b) the Debtor in Possession's corresponding
3 utility company accounts; (c) the property address where the utility is provided (if applicable), and
4 (d) a description of the location. None of the Utility Companies hold pre-petition deposits. Prior to
5 the Petition Date, the Debtor in Possession timely remitted payments on monthly utility service
6 obligations. The sum of all monthly payments to these utilities for these accounts average about
7 \$70,000.00 per month in the aggregate. Pursuant to section 366(c) of the Bankruptcy Code, the
8 Debtor in Possession proposes to provide its Utility Companies adequate assurance of payment as
9 follows:

10 a. Upon request, the Debtor in Possession will provide each Utility Company a
11 cash deposit (the "Deposit") in an amount equal to fifty percent (50%) of the Debtor in Possession's
12 estimated monthly cost of its utility consumption from each Utility Company, less amounts, if any,
13 of existing prepetition utility deposits. The estimated monthly cost will be calculated using the
14 average of monthly invoices for the past year. If a Utility Company provides the Debtor in
15 Possession with services under multiple accounts, then the Debtor in Possession may provide that
16 Utility Company with one deposit that equals fifty percent (50%) of the aggregate estimated monthly
17 usage under all of the Debtor in Possession's accounts with that Utility Company. The Deposit shall
18 be provided within ten (10) court days of the receipt by the Debtor in Possession or its bankruptcy
19 counsel of a written request from a Utility Company for adequate assurance under the Bankruptcy
20 Code.

21 b. In the event that a Utility Company believes that the Debtor in Possession's
22 utility Deposit does not constitute adequate assurance of payment that is "satisfactory" to that Utility
23 Company in accordance with section 366(c)(2), within forty-five (45) calendar days of entry of the
24 Court's order approving the Motion, the Utility Company must serve upon the Debtor in Possession
25 and its counsel, and file with the Court a specific request for adequate assurance ("Assurance
26 Request"). The Assurance Request must include: (i) the location and account number(s) for which
27 utility services are provided; (ii) the outstanding balance on the account and a summary of the Debtor
28 in Possession's payment history; (iii) the reasons why the Deposit does not constitute satisfactory

1 adequate assurance of payment; and (iv) a proposal of what the Utility Company believes would
2 constitute satisfactory adequate assurance of payment. Without further order of the Court, the
3 Debtor in Possession may enter into agreements granting additional adequate assurance to a Utility
4 Company that timely files and serves an Assurance Request. Failure by a Utility Company to timely
5 file and serve an Assurance Request shall result in such Utility Company being deemed to have
6 received satisfactory adequate assurance of payment, and shall be prohibited from altering, refusing,
7 or discontinuing service to the Debtor in Possession.

8 c. In the event that one or more Utility Companies submit an Assurance
9 Request that is determined by the Debtor in Possession to be unreasonable, within twenty-one (21)
10 days of receipt of such Assurance Request the Debtor in Possession will schedule a hearing on
11 shortened notice and serve notice of such hearing on the affected Utility Companies. The Utility
12 Companies shall be prohibited from altering, refusing or discontinuing service to the Debtor in
13 Possession until the Court issues an order authorizing such action, after a hearing on the Assurance
14 Request.

15 3. The Debtor in Possession submits that the proposed adequate assurance to Utility
16 Companies sufficiently addresses the requirements of section 366.

17 **VI. (FWP-6) DEBTOR IN POSSESSION'S EMERGENCY MOTION TO**
18 **(1) ESTABLISH NOTICE PROCEDURES, (2) FILE CONFIDENTIAL**
19 **INFORMATION UNDER SEAL, AND (3) TEMPORARILY SUSPEND DEADLINE**
20 **FOR FILING PROOFS OF CLAIMS**

21 1. The Debtor in Possession moves this Court, on an emergency basis, for entry of an
22 order in substantially the form attached to the Exhibit List as Exhibit 2 filed with the Limited Notice
23 Motion (the "Order"), (i) establishing notice procedures, (ii) authorizing the Debtor in Possession
24 to file confidential information under seal, and (iii) temporarily suspending the deadline to file proofs
25 of claim (the "Bar Date") (the "Limited Notice Motion").

26 2. Given the large number of potential creditors and claimants, most of whom consist
27 of abuse survivor claimants, the Debtor in Possession seeks permission to limit notice and also to
28 file certain confidential information under seal, given the particularly sensitive nature of claims,
survivor identities, and other matters in this Bankruptcy Case. The Debtor in Possession also seeks

1 to suspend temporarily the Bar Date to provide the Debtor in Possession with sufficient time to
2 employ a claims agent and formulate a Court-approved, streamlined claims submission process in
3 consultation with a committee to be appointed.

4 **VII. (FWP-7) DEBTOR'S EMERGENCY MOTION FOR INTERIM AND FINAL**
5 **ORDERS AUTHORIZING THE DEBTOR IN POSSESSION TO (1) PAY CERTAIN**
6 **PREPETITION INVOICES FOR ABUSE SURVIVORS' ASSISTANCE AND SAFE**
7 **ENVIRONMENT PROGRAMS, AND (2) CONTINUE ITS PREPETITION**
8 **PRACTICE OF PAYING FOR ABUSE SURVIVORS' ASSISTANCE AND SAFE**
9 **ENVIRONMENT PROGRAMS**

10 1. The Debtor in Possession moves this Court for the entry of interim and final
11 orders, authorizing the Debtor in Possession: (i) to pay certain prepetition invoices for abuse
12 survivors' assistance and safe environment programs, and (ii) to continue to pay certain invoices
13 for such programs in the ordinary course of its business (the "Abuse Survivors' Assistance Motion").

14 2. The Debtor in Possession has an established process for survivors of clergy abuse to
15 have access to trained professionals who can help them address their trauma. To support these
16 survivors, among other things, the Debtor pays for the survivors' counseling with licensed therapists.

17 3. In addition, the Debtor in Possession has implemented safe environment programs
18 to prevent the future occurrence of sexual abuse by clergy or others affiliated with the Debtor in
19 Possession. These safe environment programs involve, among other things, strict education and
20 training protocols for all who minister or volunteer within the Diocese and mandatory fingerprinting
21 and background checks for employees, clergy, and volunteers who have direct contact with children.

22 4. These programs are meant to serve those affected by historical clergy sexual abuse
23 and to prevent future abuse. They must continue uninterrupted during this Bankruptcy Case. It is
24 therefore necessary and appropriate to authorize the Debtor in Possession to pay any outstanding
25 prepetition balances due and owing for these programs and to continue to fund these programs on a
26 postpetition basis in the ordinary course of business.

27 **VIII. (FWP-8) APPLICATION OF DEBTOR IN POSSESSION PURSUANT TO 28 U.S.C.**
28 **§ 156(c) FOR AN ORDER APPOINTING DONLIN, RECANO & COMPANY, INC.**
AS CLAIMS AND NOTICING AGENT

1. The Debtor in Possession, seeks an order, pursuant to section 156(c) of title 11 of
the United States Code, 11 U.S.C. §§ 101– 1532 (the "Bankruptcy Code") and Rules 9013-1(a) and

1 5075-1(b) of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”): (a) appointing
2 Donlin, Recano & Company, Inc. (“DRC”) as claims and noticing agent (the “Claims and Noticing
3 Agent”), effective as of the Petition Date.

4 2. DRC is a bankruptcy administrator specializing in claims management and legal
5 administration services. DRC provides comprehensive chapter 11 services, including noticing,
6 claims processing, balloting, and other related services critical to the effective administration of this
7 Chapter 11 Case. As seen in the consolidated creditor matrix, there are numerous entities to be
8 noticed in this Chapter 11 Case. In view of the number of notice entities, the anticipated number of
9 claimants, and the complexity of the Debtor in Possession’s business, the Debtor in Possession
10 submits that the appointment of a claims and noticing agent is both necessary and in the best interests
11 of the Debtor in Possession, its estate, its creditors, and all parties in interest. DRC is equipped to
12 handle the volume of mailings and claims involved in this Chapter 11 Case. DRC is one of the
13 country’s leading chapter 11 administrators, with experience in noticing, claims administration, and
14 facilitating other administrative aspects of chapter 11 cases.

15 3. By appointing DRC as the Claims Agent in this case, the distribution of notices and
16 the processing of claims will be expedited, and the Office of the Clerk of the Bankruptcy Court (the
17 “Clerk’s Office”) will be relieved of the administrative burden of processing what may be an
18 overwhelming number of claims.

19 **NOTICE IS FURTHER GIVEN** that although you are not required to do so, if you wish
20 to file a response to any of the First Day Motions explaining your position, you may do so at:

21 UNITED STATES BANKRUPTCY COURT
22 EASTERN DISTRICT OF CALIFORNIA
23 501 I Street, 3rd Floor
24 Sacramento, CA 95814

25 If you mail your response to the Court for filing, you must mail it early enough so the Court
26 will receive it before the date of the hearing. You must also mail a copy to:

27 The Roman Catholic Bishop of Sacramento,
28 a California corporation sole,
c/o Felderstein Fitzgerald Willoughby
Pascuzzi & Rios, LLP
500 Capitol Mall, Suite 2250
Sacramento, CA 95814

NOTICE IS FURTHER GIVEN that you can determine whether the matter has been resolved without oral argument or whether the court has issued a tentative ruling, and can view pre-hearing dispositions (if any, none expected for the First Day Motions) by checking the Court's website at www.caeb.uscourts.gov after 4:00 P.M. the day before the hearing. Parties appearing telephonically must view the pre-hearing dispositions prior to the hearing.

NOTICE IS FURTHER GIVEN that your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Dated: April 1, 2024

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

By /s/ Paul J. Pascuzzi
PAUL J. PASCUZZI
JASON E. RIOS
THOMAS R. PHINNEY
Proposed Attorneys for The Roman Catholic
Bishop of Sacramento

Dated: April 1, 2024

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Ori Katz
ORI KATZ
ALAN H. MARTIN
Proposed Attorneys for The Roman Catholic
Bishop of Sacramento