

Gordon Rees Scully Mansukhani, LLP
101 W. Broadway, Suite 2000
San Diego, CA 92101

JEFFREY D. CAWDREY (SBN: 120488)
MEGAN M. ADEYEMO TX BN: 24099595) (*PRO HAC VICE PENDING*)
KATHRYN M.S. CATHERWOOD (SBN: 149710)
KATHLEEN M. PATRICK (NY BN: 5638572) (*PRO HAC VICE PENDING*)
ANNIE C. MATTHEWS (TX BN: 24115058) (*PRO HAC VICE PENDING*)
GORDON REES SCULLY MANSUKHANI, LLP
101 W. Broadway, Suite 2000
San Diego, California 92101
Telephone: (619) 696-6700
Facsimile: (619) 696-7124
jcawdrey@grsm.com
madeyemo@grsm.com
kcatherwood@grsm.com
kpatrick@grsm.com
amatthews@grsm.com

Attorneys for Debtor
The Roman Catholic Bishop of San Diego

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

In re:

THE ROMAN CATHOLIC BISHOP OF SAN
DIEGO, a California Corporation Sole,

Debtor.

Case No. 24-

Chapter 11

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

Date: June 18, 2024
Time: 2:00 p.m.
Location: Courtroom 218
Dept.: 1
Judge: Hon. Christopher B. Latham

**TO THE HONORABLE CHRISTOPHER B. LATHAM, CHIEF UNITED STATES
BANKRUPTCY JUDGE, THE UNITED STATES TRUSTEE, AND PARTIES IN
INTEREST:**

PLEASE TAKE NOTICE THAT The Roman Catholic Bishop of San Diego ("Debtor"),
the debtor and debtor-in-possession in the above captioned bankruptcy case, has filed six motions
seeking immediate relief as follows (collectively, the "First Day Motions"):

- DEBTOR'S FIRST DAY MOTION FOR INTERIM AND FINAL ORDERS
(1) AUTHORIZING PAYMENT OF PREPETITION WAGES, SALARIES,
AND EMPLOYEE EXPENSES; (2) AUTHORIZING PAYMENT OF**

1 ACCRUED EMPLOYEE BENEFITS AND TAXES; AND (3) DIRECTING
2 BANKS TO HONOR PAYROLL AND EXPENSE REIMBURSEMENT
3 CHECKS

4 2. DEBTOR'S FIRST DAY MOTION FOR INTERIM AND FINAL ORDERS
5 (A) PROHIBITING UTILITIES FROM ALTERING, REFUSING OR
6 DISCONTINUING SERVICE TO, OR DISCRIMINATING AGAINST, THE
7 DEBTOR ON ACCOUNT OF PREPETITION AMOUNTS DUE, (B)
8 ESTABLISHING PROCEDURES TO DETERMINE REQUESTS FOR
9 ADEQUATE ASSURANCE, AND (C) SCHEDULING A FINAL HEARING

10 3. DEBTOR'S FIRST DAY MOTION FOR INTERIM AND FINAL ORDERS
11 TO PROTECT CONFIDENTIAL INFORMATION AND ESTABLISHING
12 NOTICE PROCEDURES

13 4. DEBTOR'S FIRST DAY APPLICATION FOR ENTRY OF AN ORDER (I)
14 AUTHORIZING AND APPROVING THE APPOINTMENT OF DONLIN,
15 RECANO & COMPANY, INC. AS CLAIMS AND NOTICING AGENT,
16 AND (II) GRANTING RELATED RELIEF

17 5. DEBTOR'S FIRST DAY MOTION FOR INTERIM AND FINAL ORDERS
18 TO CONTINUE INSURANCE PROGRAMS

19 6. DEBTOR'S FIRST DAY MOTION FOR INTERIM AND FINAL ORDERS
20 (A) AUTHORIZING (1) CONTINUED USE OF CASH MANAGEMENT
21 SYSTEM AND RELATED ACCOUNTS, (2) MAINTENANCE OF
22 EXISTING BUSINESS FORMS, AND (3) CONTINUED USE OF
23 CURRENT INVESTMENT POLICY; (B) EXCUSING COMPLIANCE
24 WITH SECTION 345(B); AND (C) SCHEDULING A FINAL HEARING

25 NOTICE IS FURTHER GIVEN interim hearings on the First Day Motions are **June 18,**
26 **2024, at 2:00 p.m.** at the United States Bankruptcy Court for the Southern District of California,
27 before the Honorable Judge Christopher B. Latham, 325 West F Street, Courtroom 218
28 (Department 1), San Diego, California 92101 (the "First Day Hearings"), at which the Court will
hear and consider approval of the First Day Motions. Interested parties that would like to appear
telephonically must contact the courtroom deputy.

PLEASE TAKE FURTHER NOTICE THAT THE FIRST DAY MOTIONS ARE
FILED IN ACCORDANCE WITH THE GUIDELINES FOR FIRST DAY MOTIONS. AS
REQUIRED BY THE GUIDELINES FOR FIRST DAY MOTIONS, ANY PARTY IN
INTEREST WHO OPPOSES A FIRST DAY MOTION SHALL FILE WRITTEN
OPPOSITION ON OR BEFORE **JUNE 18, 2024 AT 10:00 A.M. PT.** PLEASE NOTE

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THAT THE FAILURE TO NOTIFY THE COURT OF OPPOSITION TO THIS MOTION MAY BE DEEMED TO BE CONSENT TO THE RELIEF REQUESTED, AND THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE.

The First Day Motions are supported by the *Declaration of Rodrigo Valdivia in Support of First Day Motions* (the “Valdivia Declaration”) and the *Declaration of Shirley Pajanor in Support of First Day Motions* (the “Pajanor Declaration,” and together with the Valdivia Declaration, the “First Day Declarations”).

NOTICE IS FURTHER GIVEN that the Debtor also requests that the Court set final hearings for approval of any interim relief granted in the First Day Motions. You will be provided notice of the date of any further or final hearings on the First Day Motions at a later time.

NOTICE IS FURTHER GIVEN that this notice does not contain all the particulars of the First Day Motions or supporting documents for the First Day Motions, nor does it summarize all of the evidence submitted in support of the First Day Motions. For further specifics concerning the First Day Motions and the relief requested, you are encouraged to review the First Day Motions and the supporting evidence, including the supporting Declarations, copies of which may be obtained from the website to be maintained by Debtor’s proposed Claims and Noticing Agent, Donlin, Recano & Company, Inc., www.donlinrecano.com/Clients/rcbsd/Dockets.

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: June 17, 2024

GORDON REES SCULLY MANSUKHANI,
LLP

By: /s/ Jeffrey D. Cawdrey

Jeffrey D. Cawdrey
Kathryn M.S. Catherwood
Megan M. Adeyemo
Annie Carter Matthews
Attorneys for Debtor,
The Roman Catholic Bishop of San Diego