

1 STEVEN H. FELDERSTEIN, State Bar No. 056978
PAUL J. PASCUZZI, State Bar No. 148810
2 JENNIFER E. NIEMANN, State Bar No. 142151
FELDERSTEIN FITZGERALD
3 WILLOUGHBY & PASCUZZI LLP
400 Capitol Mall, Suite 1750
4 Sacramento, CA 95814
Telephone: (916) 329-7400
5 Facsimile: (916) 329-7435
sfelderstein@ffwplaw.com
6 ppascuzzi@ffwplaw.com
jniemann@ffwplaw.com

7 Proposed Attorneys for The Roman Catholic Bishop of
8 Stockton

9 UNITED STATES BANKRUPTCY COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 SACRAMENTO DIVISION

12 In re:

CASE NO. 14-20371-C-11

13 THE ROMAN CATHOLIC
14 BISHOP OF STOCKTON, a
California corporation sole,

[NO HEARING REQUIRED]

15 Debtor-In-Possession.

16 **DECLARATION CONCERNING SINGLE ASSET REAL ESTATE**

17
18 I, Douglas Adel, declare as follows:

19 1. I am the Chief Financial Officer of The Roman Catholic Bishop of Stockton, a
20 California corporation sole (the "RCB" or Debtor"), the debtor and debtor-in-possession in the
21 above-captioned Chapter 11 case ("Chapter 11 Case"). As the Chief Financial Officer, I am
22 generally familiar with the RCB's day-to-day operations, business affairs and books and records.

23 2. All facts set forth in this Declaration are based on my personal knowledge, upon
24 information supplied to me by people who report to me, upon information supplied to me by
25 RCB's professionals and consultants, upon my review of relevant documents, or upon my opinion
26 based on my experience and knowledge with respect to RCB's operations, financial condition and
27 related business issues. The documents submitted herewith, referenced herein or otherwise relied
28 upon by me for purposes of this Declaration are the business records of RCB, prepared and kept

1 in ordinary and regularly conducted business activity of RCB, and used by me for those purposes.
2 If I were called upon to testify, I could and would testify competently to the facts set forth herein,
3 and I am authorized to submit this Declaration on behalf of RCB.

4 3. The Debtor is the owner of five parcels of real property described below and on
5 Schedule D to the Debtor's Schedules of Assets and Liabilities which will be filed shortly:

6 a. Pastoral/Meeting Center, 212 & 220 N. San Joaquin St, Stockton, CA.,
7 APN 139-130-210 and APN 139-130-240.

8 b. Bishop's Residence, 205 E. Harding Way, Stockton, CA, APN 127-090-
9 150.

10 c. Eucharistic Franciscan Srs. Residence, 1205 N. San Joaquin St, Stockton,
11 CA, APN 139-030-290.

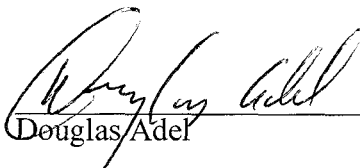
12 d. UOP Newman Center/St. John Vianney House, 4101 N. Manchester,
13 Stockton, CA, APN 110-206-130.

14 e. Vacant Property, Approx. 15 Acres in Valley Springs, CA, APN 46-001-
15 134.

16 3. This case is not a single asset real estate case as defined in 11 U.S.C. § 101(51B)
17 because: a) the Debtor has five different distinct real property holdings; and (b) substantial
18 business is conducted by the Debtor on three of those properties other than the business of
19 operating the real property.

20 4. This declaration is filed pursuant to the Court's Order to (1) File Status Report; (2)
21 Attend Preliminary Status Conference; and (3) Disclose Single Asset Real Estate filed on
22 January 23, 2014.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed on
24 January 29, 2014, at Stockton, California.

25 
26 Douglas Adel