

January 10, 2025

VIA E-MAIL

Jeffrey R. Anderson
366 Jackson Street, Suite 100
St. Paul, MN 55101

Re: *In re The Roman Catholic Archbishop of San Francisco*

Dear Mr. Anderson:

Sheppard Mullin represents The Roman Catholic Archbishop of San Francisco (“RCASF” or the “Debtor”) in connection with its bankruptcy proceedings before the United States Bankruptcy Court for the Northern District of San Francisco (the “Bankruptcy Court”). Please be advised that on August 21, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). The Debtor’s chapter 11 bankruptcy case remains pending before the Bankruptcy Court and is being administered under Case No. 23-30564 (the “Bankruptcy Case”).

Please take notice that section 362(a) of the Bankruptcy Code operates as an automatic “stay, applicable to all entities, of—the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the [bankruptcy] case . . . or to recover a claim against the debtor that arose before the commencement of the [bankruptcy] case” and of “any act to obtain possession of property of the estate or property from the estate or to exercise control over property of the estate.” 11 U.S.C. §§ 362(a)(1), (a)(3).

The intentionally broad reach of the automatic stay requires parties in interest “to maintain the status quo ante and to remediate acts taken in ignorance of the stay.” *In re Roberts*, 175 B.R. 339, 343 (B.A.P. 9th Cir. 1991). The automatic stay applies to “any pleading that asserts a claim on which relief is sought,” regardless of the forum, and enjoins related processes. *Koolik v. Markowitz*, 40 F.3d 567, 568 (2d Cir. 1994); *see also In re Congregation Birchos Yosef*, 535 B.R. 629, 634 (Bankr. S.D.N.Y. 2015) (holding that the initiation of proceedings in Jewish religious court against the principals of a chapter 11 debtor violated the automatic stay and that the issuance of any orders by the religious court pursuant to such proceedings were therefore void *ab initio*); *In re Midway Games, Inc.*, 428 B.R. 327, 334 (Bankr. D. Del. 2010) (applying the automatic stay to

Jeffrey R. Anderson
January 10, 2025
Page 2

bar continued investigation by administrative agency into Debtor's conduct related to certain former employees and the commencement of any potential legal proceedings pursuant to such investigation).

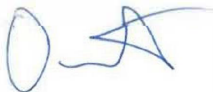
It is our understanding that, on January 6, 2025, you filed a *Petition for Hearing and Consequent Decision in Virtue of the Apostolic Letter Vos Estis Lux Mundi, Issued by His Holiness, Francis, on March 25, 2023* on behalf of each of Sandra Marie Oldfield and Danielle Louise Lacampagne, as petitioners (together, the "VELM Complaints"), against the Debtor. The VELM Complaints purport to initiate canonical legal process against the Debtor based on claims that arose prior to the Petition Date.

Please be advised that the filing of the VELM Complaints is in direct violation of the automatic stay imposed under section 362(a) of the Bankruptcy Code. Moreover, the VELM Complaints appear designed in part to derail the ongoing mediation process in which the parties are committing substantial resources to seek a resolution that will include monetary settlements for all of your clients and the other claimants. The Debtor reserves and retains all rights in connection with the VELM Complaints and any other related violations of the automatic stay.

Please be advised that any further attempt to prosecute the VELM Complaints constitutes a further willful violation of the automatic stay and may subject you to sanctions, including actual damages, costs and attorneys' fees, or punitive damages under section 362(k) of the Bankruptcy Code. *See* 11 U.S.C. § 362(k) (providing that debtors injured by willful violation of automatic stay "shall recover actual damages, including costs and attorneys' fees, and, in appropriate circumstances, may recover punitive damages").

In re Congregation Birchos Yosef, 535 B.R. at 639 is directly on point. The bankruptcy court imposed coercive sanctions in the amount of \$10,000 per day on each of the parties who initiated proceedings in Jewish religious court after finding that such proceedings were brought for the purpose of disrupting the debtor's ongoing bankruptcy case. The bankruptcy court found no distinction between a civil and a canonical proceeding.

Sincerely,

A handwritten signature in blue ink, appearing to be "Ori Katz", with a stylized flourish at the end.

Ori Katz
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP