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UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO DIVISION

In re	Case No. 24-21326
THE ROMAN CATHOLIC BISHOP OF SACRAMENTO,	Chapter 11
Debtor in Possession.	DCN: FWP-59

**DECLARATION OF STEVE CHAMBERLAIN IN SUPPORT OF DEBTOR'S
 APPLICATION FOR AN ORDER AUTHORIZING THE EMPLOYMENT OF
 COLLIERS INTERNATIONAL CA, INC. AS REAL ESTATE BROKER**

1 I, Steve Chamberlain, declare as follows:

2 1. I submit this Declaration in support of the Application for an Order Authorizing the
3 Employment and Retention of Colliers International CA, Inc. ("Colliers") as Real Estate Broker
4 (the "Application"), filed by the Roman Catholic Bishop of Sacramento ("RCBS" or "Debtor") in
5 the above-captioned bankruptcy case (the "Bankruptcy Case"). All capitalized but undefined terms
6 in this declaration shall have the meaning given to them in the Application. Except as otherwise
7 noted, I have personal knowledge of the matters set forth herein and, if called as a witness, I would
8 testify thereto.

9 2. I hold a real estate broker's license from the California Department of Real Estate
10 (#00813856). I have over 30 years of commercial real estate experience in land and investment
11 sales. I joined Colliers in 1998, and I am the Executive Vice President for Colliers.

12 3. I have worked with the RCBS since approximately 1988 on real property matters. I
13 have worked on sales and acquisitions of property with the RCBS and affiliated entities such that I
14 and Colliers have a thorough understanding of the market in Northern California and how to
15 maximize value. Affiliated entities include parishes, the RCBS real estate trust, the Catholic
16 Foundation and others. As noted herein, the RCBS believes that my extensive experience with the
17 types of properties to be sold will be invaluable to the RCBS's efforts to maximize values.

18 4. The Debtor has requested that Colliers serve as the real estate broker to market
19 and sell the fifteen (15) real properties as described below (collectively, the "Real Properties");

REAL PROPERTIES				
Unimproved Real Estate	APN #	Address	County	Description
Vacaville High School Site – 53 Acres	0138-020-230	SE Corner of Leisure Town Rd, Vacaville, CA	Solano	53 ac undeveloped land
Mace Blvd., Davis 10 acres	069-100-025-000	NW Corner of Mace Bl Montgomery Ave., Davis, CA	Yolo	12.00 ac vacant land

1	Twin Cities Road, Galt - 180 acres	148-0010-020, 21	10041 Twin Cities Rd, Galt, CA - N of Road	Sacramento	180 ac. undeveloped land
2					
3	Twin Cities Road, Galt - 94 acres	148-0062-001, 008, 009, 024,	10041 Twin Cities Rd, Galt, CA - S of Road	Sacramento	94 ac undeveloped land
4					
5	Sloughhouse Road - 80 acres	126-0040- 030,031,032,033	SE corner of Grant Line Rd and Sloughhouse Rd w/ mobile home	Sacramento	80 ac vacant land
6		820-901-339- 0000			
7	Joeger Road, Auburn - 20 acres	051-061-024- 000	E of Joeger Rd and W of Bell Rd, Auburn, CA	Placer	20 ac vacant land
8					
9	Winters - 13.75 acres	003-120-004 & 003-430-012	SW corner of West Grand Ave and Main Street, Winters, CA	Yolo	13.75 ac vacant land
10					
11	Cambridge Road, Cameron Park – 11.52 acres	082-430-002- 000	SE corner of Cambridge Rd and Country Club Drive, Cameron Park, Ca	El Dorado	11.52 ac vacant land
12					
13	Camenisch Property, Weimar - 40 acres	072-071-051	W of Hwy 80 & E of Placer Hills Rd, Colfax, CA	Placer	40 ac undeveloped land
14					
15	Caligiuri Ranch, Vacaville - 43 acres	0105-160-240	S of Cantelow Rd, W of Steiger Hill Rd, Vacaville, CA	Solano	43 ac undeveloped land
16					
17	Linda Ave, Marysville – 9.83 acres	019-260-059- 000	SE corner of Linda Ave and Goldfields PkwY, Marysville, CA	Yuba	9.83 ac vacant land
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Improved Real Estate	APN#	Address	County	Description
1123 W Street	009-0196-017	1123 W Street, Sacramento, CA	Sacramento	.29 ac w/sf residence
Trinity Pines Catholic Center	099-030-009, 045-048	28000 Rollins Lake Rd., Colfax, CA	Placer	243 ac (Various retreat buildings, mostly modular buildings)
Mercy High School Campus	033-073-011-000 & -014	233 Riverside Way, Red Bluff, CA	Tehama	Former Mercy High School Campus 31,000 sf school & 6,600 sf gym
Patrick Manogue Building	006-0105-010	1119 K Street, Sacramento, CA	Sacramento	0.08 ac (Patrick Manogue Bldg. 9,900 sf)
Pendola Center	054-280-012	17888 Mill Road, Camptonville, CA	Yuba	40 ac (Camp Pendola)
Residential Properties	APN#	Address	County	Description
Oroville—10.7 acres	031-730-034-000	857 Nelson Ave., Oroville, CA	Butte	10.7 ac of land, w/existing old house
Anderson-15.8 acres	201-480-009, 010	14 Stingy Lane, Anderson, CA	Shasta	15.8 ac undeveloped

5. As further described the proposed listing agreement, attached to the Exhibit List as **Exhibit B** (the “Listing Agreement”), Colliers’ commission will be 2% of the purchase price for each of the Real Properties, payable at the close of escrow, except for the two properties listed in the above chart under Residential Properties. For those two properties, Colliers will engage with Sheerene Mehrizi of Century 21 Select Real Estate in Oroville, CA for the Listing of 10.7 acres with existing house in Oroville, CA and Tyler Miranda of ReMax Top Properties in Red Bluff, CA for the Listing of 15.8 acres in Anderson. The commission shall be four percent (4%) for dual representation. In the event there is an outside procuring agent/broker then the total commission

1 shall be six percent (6%). Colliers will not participate in any commission for these two residential
2 properties. The general practice of Colliers, like other real estate brokers who provide similar
3 services, is to be paid on a contingency fee basis. Colliers thus does not keep detailed time records
4 similar to those prepared by attorneys.

5 6. Colliers will provide the usual services of a real estate broker, including listing and
6 marketing properties for sale and negotiation of sales contracts. I anticipate that any final
7 compensation with respect to any transaction will be sought and approved in connection with court
8 approval of any transaction.

9 7. To check and clear potential conflicts of interest in this Bankruptcy Case, as well as
10 to identify all “connections” (as such term is used in Bankruptcy Rule 2014) to the Debtor, their
11 creditors, other parties in interest and potential parties in interest, their respective attorneys and
12 accountants, the United States Trustee for the Eastern District of California (the “U.S. Trustee”),
13 any person employed in the office of the U.S. Trustee, Colliers conducted a review of the list of
14 creditors provided by the Debtor to determine whether it has or had any relationship with any entity
15 represented thereon. This review included a cross-check of the interested parties list provided by
16 the RCSB against the Colliers internal database for any completed sale or lease transactions within
17 the past two years under Colliers International CA, Inc.

18 8. To the best of my knowledge, neither I nor any other employee of Colliers has any
19 business or social connections with the Debtor, its creditors, its equity security holders, or with any
20 parties in interest, their respective attorneys or accountants, or with the Office of the U.S. Trustee
21 or any persons employed in the Office of the U.S. Trustee except as discussed herein, in the
22 Application. The following is a list of parties that showed up on our transactions list that also were
23 on the interested parties list. None of the transactions involving the parties below involved the
24 RCBS or affiliated entities.

- 25 a. ADP, Inc.
- 26 b. Bank of America
- 27 c. Caltronics Business Systems
- 28 d. Catholic Charities, Diocese of San Diego, CA

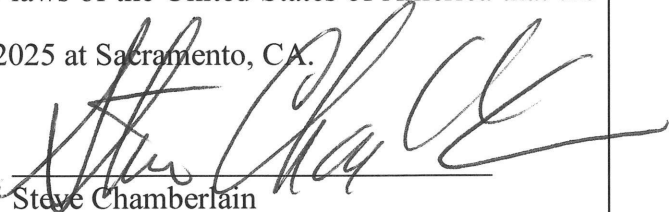
- e. Catholic Diocese of Wichita, a Kansas not-for-profit corporation
- f. CBRE, Inc.
- g. Charles Schwab & Co., Inc.
- h. Charles Schwab & Co., Inc., a California corporation
- i. Charles Schwab & Company
- j. Consolidated Communications
- k. Consolidated Communications of Northern New England Company, LLC
- l. Jackson Properties, Inc.
- m. JPMorgan Chase Bank, NA, a national banking association
- n. Mesa Energy Systems, Inc.
- o. MUFG Union Bank c/o U.S. Bank National Association
- p. Pacific Gas and Electric Company, a California corporation
- q. Pacific Oak SOR II Lincoln Court, LLC c/o CBRE
- r. RAR2-3627 N Anchor St., LLC c/o CBRE Asset Services
- s. Roman Catholic Diocese of Sacramento
- t. Saint Anne Catholic Parish in San Diego
- u. The Travelers Indemnity Company
- v. U.S. Bank National Association
- w. U.S. Bank National Association, as Trustee, as Successor in Interest to Bank of America, National Association, as Trustee, Successor by Merger to LaSalle Bank N

9. I have determined that, other than as described above, (a) there is no connection, as such term is used in section 101(14)(C) of the Bankruptcy Code, as modified by section 1107(b) and Bankruptcy Rule 2014(a), between Colliers and any party in interest in this Chapter 11 Case, including the Debtor, its creditors, the U.S. Trustee, any person employed in the office of the U.S. Trustee, or any other party with an actual or potential interest in this Bankruptcy Case or their respective attorneys or accountants; (b) Colliers is not a creditor, equity security holder, or insider of the Debtor; (c) none of the Colliers professionals is, or was within two years of the Petition Date, a director, officer, or employee of the Debtor; and (d) Colliers neither holds nor represents an

1 interest adverse to the Debtor, its estate, or any class of creditors or equity security holders by
2 reason of any direct or indirect relationship to, connection with, or interest in the Debtor, or for any
3 other reason. For the foregoing reasons, Colliers is a “disinterested person,” as defined in section
4 101(14) of the Bankruptcy Code.

5 10. Except as set forth above, no members of Colliers, or Collier’s itself, has
6 connections with the Debtor, creditors, or any party-in-interest, their respective attorneys,
7 accountants, or the U.S. Trustee, or any employee of the U.S. Trustee.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed on May 21, 2025 at Sacramento, CA.

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12 Steve Chamberlain
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