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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-94
 Date: March 9, 2026
 Time: 11:00 a.m.
 Location: Courtroom 35 (Dept. C)
 Judge: Hon. Christopher M. Klein

**DECLARATION OF THOMAS McNAMARA IN SUPPORT OF DEBTOR'S MOTION
 TO: (1) APPROVE PUBLIC SALE OF REAL PROPERTY (W STREET); (2) WAIVE 14
 DAY STAY PERIOD; AND (3) APPROVE COMMISSION TO
 THE REAL ESTATE BROKERS**

1 I, Thomas McNamara, hereby declare as follows:

2 1. I am the Chief Financial Officer ("CFO") of The Roman Catholic Bishop of
3 Sacramento, the debtor and debtor in possession herein ("Debtor" or "RCBS"). I have been the CFO
4 since 1993. I have been affiliated with the Diocese as a parishioner for over 64 years. I hold an
5 inactive Certified Public Accountant license which I obtained in 1986. I have a Bachelor of Science
6 in Accounting from the University of San Diego. I am a member of the American Institute of
7 Certified Public Accountants and the California Society of Certified Public Accountants. In the
8 course and scope of my duties as CFO, I am familiar with the record keeping practices and policies
9 of the RCBS and how it regularly maintains its business records.

10 2. All facts set forth in this Declaration are based on my personal knowledge, upon
11 information supplied to me by employees and others who report to me, upon information supplied
12 to me by the RCBS's professionals and consultants, upon my review of relevant documents, or
13 where stated as an opinion based on my experience and knowledge with respect to the RCBS's
14 operations, financial condition, and related business issues. The documents submitted herewith,
15 referenced herein or otherwise relied upon by me for purposes of this Declaration are the business
16 records of the RCBS, prepared and kept in the ordinary and regularly conducted business activity of
17 the RCBS, and used by me for those purposes. If I were called upon to testify, I could and would
18 testify competently to the facts set forth herein, and I am authorized to submit this Declaration on
19 behalf of the RCBS.

20 3. I submit this declaration ("Declaration") in support of the above-referenced Motion
21 for entry of an order: (1) approving the sale of the real property commonly known as 1123 W Street,
22 located in the City of Sacramento, County of Sacramento, State of California, and bearing Assessor's
23 Parcel Number 009-0196-017-0000 (the "Subject Property") to Can Yuan Situ, Trustee, and GUI
24 Xiu Guan, Trustee (collectively, the "Buyers") for the purchase price of eight hundred fifteen
25 thousand and 00/100 dollars (\$815,000.00) all-cash, subject to overbidding through the conclusion
26 of the sale hearing; (2) waiving the 14-day stay period imposed by Federal Rule of Bankruptcy
27 Procedure 6004(h); and (3) approving the commission in the amount of \$36,675.00 (4.5% of the
28 purchase price), or the appropriate commission resulting from a successful overbid (hereinafter, the

1 “Commission”) (the “Motion”). All terms not otherwise defined herein have the same meaning as
2 set forth in the Motion. I have reviewed the Motion and believe that the factual statements contained
3 therein are true and correct.

4 4. On or about October of 1961, the Subject Property was acquired by the RCBS. The
5 Subject Property consists of approximately +/- 0.29 acres and includes an approximate 4,310 square
6 foot structure, consisting of 10 bedrooms and 3 bathrooms. The Subject Property was listed by the
7 Colliers International CA, Inc. (the “Broker”). The Broker assisted in the negotiation of the sale of
8 the Subject Property, and the RCBS entered into the Sale Agreement (defined below).

9 5. The RCBS, desires to sell and the Buyers desire to purchase the Subject Property.

10 6. Subject to Bankruptcy Court approval, the RCBS has entered into a sale agreement
11 with the Buyers providing for the Buyers’ purchase of the Subject Property (“Sale Agreement”). A
12 true and correct copy of the Sale Agreement is attached to the Exhibit List as ***Exhibit 1***.

13 7. In my opinion and to my knowledge, the Sale Agreement was negotiated and entered
14 into by the RCBS and the Buyers through an arm’s length bargaining process. I am informed and
15 believe that the Buyers on the one hand, and the RCBS on the other, are not related.

16 8. In my opinion and to my knowledge, the RCBS and the Buyers have acted in good
17 faith in connection with the proposed sale. I am not aware of any collusion or improper dealings
18 between the RCBS and the Buyer, or any other person or party in connection with the proposed sale.

19 9. The net proceeds resulting from the sale of the Subject Property are estimated to be
20 approximately \$762,025.00, calculated as follows:

Item	Amount (\$)
Sale Price	\$815,000.00
(Brokers’ Commission @ 4.5%)	(\$36,675.00)
(Estimated Costs of Sale @ 2%)	(\$16,300.00)
Estimated Net Proceeds	\$762,025.00

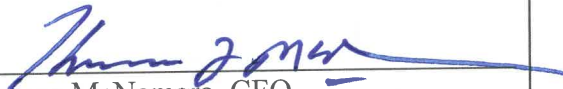
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27 10. I am informed and believe that the purchase price of \$815,000.00 was the result of
28 good faith, arms-length negotiations with the Buyers.

11. The RCBS marketed the Subject Property with the assistance of the Broker. I am informed and believe that the Subject Property was marketed through various websites, having been listed on the multiple listing service, Colliers.com, CoStar/LoopNet, and CREXi. In addition, the Subject Property was e-blasted three separate times as a development opportunity, having been sent to approximately 19,283 recipients/subscribers. Additionally, the Subject Property received approximately nine tours. The Buyer's all-cash offer also ensures a high degree of confidence in the timely and successful closing of the Subject Property. Moreover, prospective buyers interested in bidding more will have an opportunity to do so through the conclusion of the sale hearing. In light of the circumstances, the RCBS has concluded that: (1) the price offered for the Subject Property is fair and reasonable; (2) the Buyers' all-cash offer provides a strong assurance of a timely and successful closing; and (3) the marketing effort undertaken by the Broker was reasonably calculated to yield the highest price for the Subject Property under the circumstances presented.

12. The RCBS believes that it is in the best interests of the estate to sell the Subject Property pursuant to the Sale Agreement, subject to potential overbids at a public auction pursuant to the overbidding procedures. The RCBS is subjecting the value of the Subject Property to market testing by permitting qualified bidders to bid on the Subject Property through the conclusion of the sale hearing, thereby subjecting the proposed sale to a market check through the solicitation of competing bids in a court-supervised process. Accordingly, all parties in interest can be assured that the consideration received for the Subject Property will be fair and reasonable.

13. It is the opinion of the RCBS that the proposed bidding procedures are fair in all respects and are reasonably calculated to promote an opportunity for overbidding on the Subject Property. The procedures are intended to maximize the value of the Subject Property, provide for a smooth and efficient sale process, and ensure that bids are likely to close.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 12, 2026, at Sacramento, California.

/s/ 
Thomas McNamara, CFO