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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

Jane Roe 25; Jane Roe 26; Jane Roe 27; Jane Roe 50; Jane Roe 51; Jane Roe 52; John Roe 54; John Roe 55; John Roe 56; John Roe 57; John Roe 60; John Roe 68; John Roe 71; John Roe 74; John Roe 75; John Roe 100; John Roe 101; John Roe 102; James Black; John AA Roe SD; John RB Roe SD; John LF Roe SD; Jane AM Roe SD; John GS2 Roe SD; John JT Roe SD; John MV Roe SD; John BB Roe SD; John MC Roe SD; John JD2 Roe SD; John JD1 Roe SD; John KD 1 Roe SD; Jane LG Roe SD; John PH Roe SD; John ML Roe SD; John RM Roe SD; John BN Roe SD; Jane MR Roe SD; John MS Roe SD; John GS Roe SD; John GT Roe SD; John SB Roe SD; John CB Roe SD; John GC Roe SD; John HC Roe SD; John KD 2 Roe SD; John AD Roe SD; John RH Roe SD; Jane MM Roe SD; John DR Roe SD; John JY Roe SD; Jane MA Roe SD ; Jane LD Roe SD; John JF Roe SD; John JG Roe SD; Jane AL Roe SD; Jane SS Roe SD; Jane JZ Roe SD; Jane JH Roe SD; John WQ Roe SD; Jane NH Roe SD; John Doe (JJ); John WS Roe SD; Victoria Lippert;	**CASE NO.:** **COMPLAINT TO SET ASIDE VOIDABLE TRANSACTIONS:** **1. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **2. Set Aside Voidable Transaction - Civil Code § 3439.05** **3. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **4. Set Aside Voidable Transaction - Civil Code § 3439.05** **5. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **6. Set Aside Voidable Transaction - Civil Code § 3439.05** **7. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **8. Set Aside Voidable Transaction - Civil Code § 3439.05** **9. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **10. Set Aside Voidable Transaction - Civil Code § 3439.05**

Jane MV Roe SD; Jane CB Roe SD; Jane JH Roe SD; John TG Roe SD; Jane ZLFC Roe SD; Jane ZLFP Roe SD; John JC Roe SB; John LS Roe SD; Jane RL Roe SD; Jane TI Roe SD; Jane MS Roe SD; Jane RT Roe SD; Matt Way; Jane SS Roe SD; John CG Roe SD; John AR Roe SD; John SS Roe SD; John CU Roe SD; John JM Roe SD; John MA Roe SD; Jane RCI Roe SD; John TC Roe SD; Jane DC Roe SD; Jane CC Roe SD; Jane GG Roe SD; Jane JG Roe SD; John MM Roe SD; John TS Roe SD; John RS Roe SD; John DT Roe SD; John HB Roe SD; John OM Roe SD; John JS Roe SD; John AZ Roe SD; John JS Roe SD; John RS Roe SD; John RD Roe SD; individually and Bonita Hurtle, in her capacity as successor in interest of Christopher Hurtle; Ambrosia Charfauros, as successor in interest to Janis Van Sickle; Angelina Perez, in her capacity as successor in interest of Oscar Perez; Michael Christopher Mayne, in his capacity as successor in interest of Marvin T. Mayne, Jr., Plaintiffs, v. Roman Catholic Bishop of San Diego, a Corporation Sole; All Hallows Catholic Parish in San Diego, California Real Property Support Corporation; Ascension Catholic Parish in San Diego, California, Real Property Support Corporation; Blessed Sacrament Catholic Parish in San Diego, California Real Property Support Corporation; Christ the King Catholic Parish in San Diego, California Real Property Support Corporation; Corpus Christi Catholic Parish in Bonita, California Real Property Support Corporation; Good Shepherd Catholic Parish in San Diego, California Real Property Support Corporation; Guardian Angels Catholic Parish in Santee, California Real Property Support Corporation; Holy Spirit Catholic Parish in San Diego, California Real Property Support Corporation; Holy Trinity Catholic Parish in El Cajon, California Real Property Support Corporation; Immaculate Conception Catholic Parish in San Diego, California Real Property Support	**11. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **12. Set Aside Voidable Transaction - Civil Code § 3439.05** **13. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **14. Set Aside Voidable Transaction - Civil Code § 3439.05** **15. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **16. Set Aside Voidable Transaction - Civil Code § 3439.05** **17. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **18. Set Aside Voidable Transaction - Civil Code § 3439.05** **19. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **20. Set Aside Voidable Transaction - Civil Code § 3439.05** **21. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **22. Set Aside Voidable Transaction - Civil Code § 3439.05** **23. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **24. Set Aside Voidable Transaction - Civil Code § 3439.05** **25. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **26. Set Aside Voidable Transaction - Civil Code § 3439.05** **27. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **28. Set Aside Voidable Transaction - Civil Code § 3439.05** **29. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **30. Set Aside Voidable Transaction - Civil Code § 3439.05** **31. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **32. Set Aside Voidable Transaction - Civil Code § 3439.05** **33. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **34. Set Aside Voidable Transaction - Civil Code § 3439.05** **35. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **36. Set Aside Voidable Transaction - Civil Code § 3439.05** **37. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **38. Set Aside Voidable Transaction - Civil Code § 3439.05**

Corporation; Immaculate Heart of Mary Catholic Parish in Ramona, California Real Property Support Corporation; Mary Star of the Sea Catholic Parish in La Jolla, California Real Property Support Corporation; Mater Dei Catholic Parish in Chula Vista, California Real Property Support Corporation; Mission San Antonio de Pala Catholic Parish in Pala, California Real Property Support Corporation; Mission San Diego de Alcala Catholic Parish in San Diego, California Real Property Support Corporation; Mission San Luis Rey Catholic Parish in Oceanside, California Real Property Support Corporation; Most Precious Blood Catholic Parish in Chula Vista, California Real Property Support Corporation; Church of the Nativity Catholic Parish in Rancho Santa Fe, California Real Property Support Corporation; Our Lady of Angels Catholic Parish in San Diego, California Real Property Support Corporation; Our Lady of Grace Catholic Parish in El Cajon, California Real Property Support Corporation; Our Lady of Guadalupe Catholic Parish Calexico in Calexico, California Real Property Support Corporation; Our Lady of Guadalupe Catholic Parish Chula Vista in Chula Vista, California Real Property Support Corporation; Our Lady of Guadalupe Catholic Parish El Centro in El Centro, California Real Property Support Corporation; Our Lady of Guadalupe Catholic Parish San Diego in San Diego, California Real Property Support Corporation; Our Lady of Light Catholic Parish in Descanso, California Real Property Support Corporation; Our Lady of Mt. Carmel Catholic Parish San Diego in San Diego, California Real Property Support Corporation; Our Lady of Mt. Carmel Catholic Parish San Ysidro in San Ysidro, California Real Property Support Corporation; Our Lady of Perpetual Help Catholic Parish Lakeside, in Lakeside California Real Property Support Corporation; Our Lady of Refuge Catholic Parish in San Diego, California Real Property Support Corporation; Our Lady of the Rosary Catholic Parish in San Diego, California Real Property Support Corporation; Our Lady of the Sacred Heart Catholic Parish in San Diego, California Real Property Support Corporation; Our	**39. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **40. Set Aside Voidable Transaction - Civil Code § 3439.05** **41. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **42. Set Aside Voidable Transaction - Civil Code § 3439.05** **43. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **44. Set Aside Voidable Transaction - Civil Code § 3439.05** **45. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **46. Set Aside Voidable Transaction - Civil Code § 3439.05** **47. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **48. Set Aside Voidable Transaction - Civil Code § 3439.05** **49. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **50. Set Aside Voidable Transaction - Civil Code § 3439.05** **51. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **52. Set Aside Voidable Transaction - Civil Code § 3439.05** **53. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **54. Set Aside Voidable Transaction - Civil Code § 3439.05** **55. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **56. Set Aside Voidable Transaction - Civil Code § 3439.05** **57. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **58. Set Aside Voidable Transaction - Civil Code § 3439.05** **59. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **60. Set Aside Voidable Transaction - Civil Code § 3439.05** **61. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **62. Set Aside Voidable Transaction - Civil Code § 3439.05** **63. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **64. Set Aside Voidable Transaction - Civil Code § 3439.05** **65. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **66. Set Aside Voidable Transaction - Civil Code § 3439.05**

Mother of Confidence Catholic Parish in San Diego, California Real Property Support Corporation; Queen of Angels Catholic Parish in Alpine, California Real Property Support Corporation; Church of the Resurrection Catholic Parish in Escondido, California Real Property Support Corporation; Sacred Heart Catholic Parish Brawley in Brawley, California Real Property Support Corporation; Sacred Heart Catholic Parish Coronado in Coronado, California Real Property Support Corporation; Sacred Heart Catholic Parish San Diego in San Diego, California Real Property Support Corporation; Saint Adelaide of Burgundy Catholic Parish in Campo, California Real Property Support Corporation; Saint Agnes Catholic Parish in San Diego, California Real Property Support Corporation; Saint Anne Catholic Parish in San Diego, California Real Property Support Corporation; Saint Anthony of Padua Catholic Parish Imperial in Imperial, California Real Property Support Corporation; Saint Anthony of Padua National City in National City, California Real Property Support Corporation; Saint Brigid Catholic Parish in San Diego, California Real Property Support Corporation; Saint Catherine Laboure Catholic Parish in San Diego, California Real Property Support Corporation; Saint Charles of Borromeo Catholic Parish in San Diego, California Real Property Support Corporation; Saint Charles Catholic Parish in San Diego, California Real Property Support Corporation; Saint Columba Catholic Parish in San Diego, California Real Property Support Corporation; Saint Didacus Catholic Parish in San Diego, California Real Property Support Corporation; Saint Elizabeth of Hungary Catholic Parish in Julian, California Real Property Support Corporation; Saint Elizabeth Seton Catholic Parish in Carlsbad, California Real Property Support Corporation; Saint Francis of Assisi Catholic Parish in Vista, California Real Property Support Corporation; Saint Gabriel Catholic Parish in Poway, California Real Property Support Corporation; Saint Gregory the Great Catholic Parish in San Diego, California Real Property Support Corporation; Saint James Catholic Parish in Solana Beach,	)	**67. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **68. Set Aside Voidable Transaction - Civil Code § 3439.05** **69. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **70. Set Aside Voidable Transaction - Civil Code § 3439.05** **71. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **72. Set Aside Voidable Transaction - Civil Code § 3439.05** **73. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **74. Set Aside Voidable Transaction - Civil Code § 3439.05** **75. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **76. Set Aside Voidable Transaction - Civil Code § 3439.05** **77. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **78. Set Aside Voidable Transaction - Civil Code § 3439.05** **79. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **80. Set Aside Voidable Transaction - Civil Code § 3439.05** **81. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **82. Set Aside Voidable Transaction - Civil Code § 3439.05** **83. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **84. Set Aside Voidable Transaction - Civil Code § 3439.05** **85. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **86. Set Aside Voidable Transaction - Civil Code § 3439.05** **87. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **88. Set Aside Voidable Transaction - Civil Code § 3439.05** **89. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **90. Set Aside Voidable Transaction - Civil Code § 3439.05** **91. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **92. Set Aside Voidable Transaction - Civil Code § 3439.05** **93. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **94. Set Aside Voidable Transaction - Civil Code § 3439.05**

California Real Property Support Corporation; Saint John of the Cross Catholic Parish in Lemon Grove, California Real Property Support Corporation; Saint John the Evangelist Catholic Parish Encinitas in Encinitas, California Real Property Support Corporation; Saint John the Evangelist Catholic Parish San Diego in San Diego, California Real Property Support Corporation; Saint Joseph Cathedral Catholic Parish in San Diego, California Real Property Support Corporation; Saint Joseph Catholic Parish Holtville in Holtville, California Real Property Support Corporation; Saint Joseph Catholic Parish Westmorland in Westmorland, California Real Property Support Corporation; Saint Jude Shrine of the West Catholic Parish in San Diego, California Real Property Support Corporation; Saint Kieran Catholic Parish in El Cajon, California Real Property Support Corporation; Saint Louise de Marillac Catholic Parish in El Cajon, California Real Property Support Corporation; The Church of Saint Luke Catholic Parish in El Cajon, California Real Property Support Corporation; Saint Margaret Mary Catholic Parish in Brawley, California Real Property Support Corporation; Saint Margaret Catholic Parish in Oceanside, California Real Property Support Corporation; Saint Mark Catholic Parish in San Marcos, California Real Property Support Corporation; Saint Martin of Tours Catholic Parish in La Mesa, California Real Property Support Corporation; Saint Mary Magdalene Catholic Parish in San Diego, California Real Property Support Corporation; Saint Mary Catholic Parish El Centro in El Centro, California Real Property Support Corporation; Saint Mary Catholic Parish Escondido in Escondido, California Real Property Support Corporation; Saint Mary Catholic Parish National City in National City, California Real Property Support Corporation; Saint Mary, Star of the Sea Catholic Parish in Oceanside, California Real Property Support Corporation; Saint Michael Catholic Parish Poway in Poway, California Real Property Support Corporation; Saint Michael Catholic Parish San Diego in San Diego, California Real Property Support Corporation; Saint Patrick Catholic Parish Calipatria in	**95. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **96. Set Aside Voidable Transaction - Civil Code § 3439.05** **97. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **98. Set Aside Voidable Transaction - Civil Code § 3439.05** **99. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **100. Set Aside Voidable Transaction - Civil Code § 3439.05** **101. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **102. Set Aside Voidable Transaction - Civil Code § 3439.05** **103. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **104. Set Aside Voidable Transaction - Civil Code § 3439.05** **105. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **106. Set Aside Voidable Transaction - Civil Code § 3439.05** **107. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **108. Set Aside Voidable Transaction - Civil Code § 3439.05** **109. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **110. Set Aside Voidable Transaction - Civil Code § 3439.05** **111. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **112. Set Aside Voidable Transaction - Civil Code § 3439.05** **113. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **114. Set Aside Voidable Transaction - Civil Code § 3439.05** **115. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **116. Set Aside Voidable Transaction - Civil Code § 3439.05** **117. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **118. Set Aside Voidable Transaction - Civil Code § 3439.05** **119. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **120. Set Aside Voidable Transaction - Civil Code § 3439.05** **121. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **122. Set Aside Voidable Transaction - Civil Code § 3439.05**

Calipatria, California Real Property Support Corporation; Saint Patrick Catholic Parish Carlsbad in Carlsbad, California Real Property Support Corporation; Saint Patrick Catholic Parish San Diego in San Diego, California Real Property Support Corporation; Saint Peter the Apostle Catholic Parish in Fallbrook, California Real Property Support Corporation; Saint Pius X Catholic Parish Chula Vista in Chula Vista, California Real Property Support Corporation; Saint Pius X Catholic Parish Jamul in Jamul, California Real Property Support Corporation; Saint Richard Catholic Parish in Borrego Springs, California Real Property Support Corporation; Saint Rita Catholic Parish in San Diego, California Real Property Support Corporation; Saint Rose of Lima Catholic Parish in Chula Vista, California Real Property Support Corporation; Saint Stephen Catholic Parish in Valley Center, California Real Property Support Corporation; Saint Therese Catholic Parish in San Diego, California Real Property Support Corporation; Saint Therese of Carmel Catholic Parish in San Diego, California Real Property Support Corporation; Saint Thomas More Catholic Parish in Oceanside, California Real Property Support Corporation; Saint Timothy Catholic Parish in Escondido, California Real Property Support Corporation; Saint Vincent de Paul Catholic Parish in San Diego, California Real Property Support Corporation; San Rafael Catholic Parish in San Diego, California Real Property Support Corporation; Santa Sophia Catholic Parish in Spring Valley, California Real Property Support Corporation; and Does 1 through 1000, inclusive, Defendants.	**123. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **124. Set Aside Voidable Transaction - Civil Code § 3439.05** **125. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **126. Set Aside Voidable Transaction - Civil Code § 3439.05** **127. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **128. Set Aside Voidable Transaction - Civil Code § 3439.05** **129. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **130. Set Aside Voidable Transaction - Civil Code § 3439.05** **131. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **132. Set Aside Voidable Transaction - Civil Code § 3439.05** **133. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **134. Set Aside Voidable Transaction - Civil Code § 3439.05** **135. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **136. Set Aside Voidable Transaction - Civil Code § 3439.05** **137. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **138. Set Aside Voidable Transaction - Civil Code § 3439.05** **139. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **140. Set Aside Voidable Transaction - Civil Code § 3439.05** **141. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **142. Set Aside Voidable Transaction - Civil Code § 3439.05** **143. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **144. Set Aside Voidable Transaction - Civil Code § 3439.05** **145. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **146. Set Aside Voidable Transaction - Civil Code § 3439.05** **147. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **148. Set Aside Voidable Transaction - Civil Code § 3439.05** **149. Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)** **150. Set Aside Voidable Transaction - Civil Code § 3439.05**

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Based upon information and belief available to Plaintiffs, Jane Roe 25; Jane Roe 26; Jane Roe 27; Jane Roe 50; Jane Roe 51; Jane Roe 52; John Roe 54; John Roe 55; John Roe 56; John Roe 57; John Roe 60; John Roe 68; John Roe 71; John Roe 74; John Roe 75; John Roe 100; John Roe 101; John Roe 102; James Black; John AA Roe SD; John RB Roe SD; John LF Roe SD; Jane AM Roe SD; John GS2 Roe SD; John JT Roe SD; John MV Roe SD; John BB Roe SD; John MC Roe SD; John JD2 Roe SD; John JD1 Roe SD; John KD 1 Roe SD; Jane LG Roe SD; John PH Roe SD; John ML Roe SD; John RM Roe SD; John BN Roe SD; Jane MR Roe SD; John MS Roe SD; John GS Roe SD; John GT Roe SD; John SB Roe SD; John CB Roe SD; John GC Roe SD; John HC Roe SD; John KD 2 Roe SD; John AD Roe SD; John RH Roe SD; Jane MM Roe SD; John DR Roe SD; John JY Roe SD; Jane MA Roe SD ; Jane LD Roe SD; John JF Roe SD; John JG

Roe SD; Jane AL Roe SD; Jane SS Roe SD; Jane JZ Roe SD; Jane JH Roe SD; John WQ Roe SD; Jane NH Roe SD; John Doe (JJ); John WS Roe SD; Victoria Lippert; Jane MV Roe SD; Jane CB Roe SD; Jane JH Roe SD; John TG Roe SD; Jane ZLFC Roe SD; Jane ZLFP Roe SD; John JC Roe SB; John LS Roe SD; Jane RL Roe SD; Jane TI Roe SD; Jane MS Roe SD; Jane RT Roe SD; Matt Way; Jane SS Roe SD; John CG Roe SD; John AR Roe SD; John SS Roe SD; John CU Roe SD; John JM Roe SD; John MA Roe SD; Jane RCI Roe SD; John TC Roe SD; Jane DC Roe SD; Jane CC Roe SD; Jane GG Roe SD; Jane JG Roe SD; John MM Roe SD; John TS Roe SD; John RS Roe SD; John DT Roe SD; John HB Roe SD; John OM Roe SD; John JS Roe SD; John AZ Roe SD; John JS Roe SD; John RS Roe SD; John RD Roe SD; Bonita Hurtle, in her capacity as successor in interest of Christopher Hurtle; Ambrosia Charfauros, as successor in interest to Janis Van Sickle; Angelina Perez, in her capacity as successor in interest of Oscar Perez; Michael Christopher Mayne, in his capacity as successor in interest of Marvin T. Mayne, at the time of the filing of this Complaint to Set Aside Voidable Transactions, Plaintiffs make the following allegations:

PRELIMINARY ALLEGATIONS

A. Jurisdiction

1. This action involves fraudulent transfers of real property in San Diego and Imperial Counties including transfers in the city of San Diego. Plaintiffs' principal damages exceed $25,000.

B. The Parties

2. Plaintiffs are all individuals who reside in various states, including California. Some of the Plaintiffs reside in San Diego County.

3. Defendant THE ROMAN CATHOLIC BISHOP OF SAN DIEGO, A CORPORATION SOLE ("Diocese") is a California corporation sole, authorized to conduct business and conducting business in the State of California, with its principal

place of business in the city and county of San Diego, California. Defendant Diocese has responsibility for Roman Catholic Church operations in San Diego and Imperial Counties, California. Defendant Diocese is run by the individual holding the title of the Roman Catholic Bishop of San Diego, and Defendant Diocese is the corporation through which the Roman Catholic Diocese of San Diego operates. The Diocese of San Diego is the Diocese in which the sexual abuse of Plaintiffs occurred.

4. The other named Defendants (individually a "Parish" and two or more "Parishes") are each a Roman Catholic Real Property Support Corporation corresponding to a Roman Catholic church in San Diego or Imperial County. Each Defendant Parish was created to aid the Catholic Church with which it is associated, including by holding title to real property. Because each of the Real Property Support Corporations is only involved in one or a few of the causes of action alleged below, rather than identify each such Defendant in this section, each such Parish will be identified in the first of the Causes of Action applicable to that Parish.

5. Defendant Does 1 through 1000, inclusive, are individuals and/or business or corporate entities incorporated in and/or doing business in California whose true names and capacities are unknown to Plaintiffs, who therefore sue such Defendants by such fictitious names, and who will amend the Complaint to show the true names and capacities of each such Doe Defendant when ascertained. Each such Defendant Doe is legally responsible in some manner for the events, happenings and/or tortious and unlawful conduct that caused the injuries and damages alleged in this Complaint.

6. Each Defendant is the agent, servant and/or employee of other Defendants, and each Defendant was acting within the course and scope of his, her or its authority as an agent, servant and/or employee of the other Defendants. The Defendants, and each of them, are individuals, corporations, partnerships and other entities which engaged in,

joined in and conspired with the other wrongdoers in carrying out the tortious and unlawful activities described in this Complaint. Each of the Defendants ratified the acts of the other Defendants as described in this Complaint.

C. ***Plaintiffs' Claims***

7. Since January 2, 2020, Plaintiffs collectively filed 36 lawsuits against the Diocese, and/or others, San Diego Superior Court, Case Nos. 2020-00000284, 2020-00000301, 2020-00000302, 2020-00000310, 2020-00000321, 2020-00000325, 2022-00009046, 2022-00019489, 2022-00024495, 2022-00025370, 2022-00026679, 2022-00039336, 2022-00040379, 2022-00042020, 2022-00045023, 2022-00048815, 2022-00048835, 2022-00048880, 2002-00049459, 2022-00049670, 2022-00050143, 2022-00050196, 2022-00050286, 2022-00050471, 2022-00050489, 2022-00050504, 2022-00050510, 2022-00051176, 2022-00051275, 2022-00051280, 2022-00051304, 2022-00051532, 2022-00051823, 2022-00051832, 2022-00051994, 2022-00052084 (singularly an "Underlying Action" and two or more the "Underlying Actions").

8. In each of the Underlying Actions, each of the Plaintiffs alleges that they were sexually abused by a Catholic Priest, Catholic Priests, or other employees of a catholic entity in San Diego or Imperial County, that they suffered damages as a result of the abuse, that they are entitled to money damages as a result of the abuse and that the Diocese is jointly liable for all money damages which each of the Plaintiffs is entitled to recover.

9. By virtue of their allegations in the Underlying Actions, each of the Plaintiffs is a "Creditor" as defined in Civil Code § 3439.01(c) and each of the Plaintiffs have a "Claim" against each of the Defendants (collectively the "Claims") in this lawsuit as defined in Civil Code § 3439.01(b).

10. All of the tortious conduct alleged by each of the Plaintiffs in the Underlying Actions, occurred before September 1, 2019.

11. Reserved.

D. ***The Diocese's Prior Efforts to Shield its Assets and Defraud Survivors of Clergy Sexual Abuse.***

12. Effective January 1, 2003, the Legislature amended Code of Civil Procedure § 340.1 to allow for civil actions based on childhood sexual abuse – even abuse dating back many years - to be filed at any time during the 2003 calendar year. During that one-year period at least 146 civil lawsuits were filed against Diocese. These lawsuits alleged sexual abuse by Catholic priests and other employees of the Diocese. The Diocese's efforts to defraud survivors of child sexual abuse by its clergy date back at least to that earlier litigation.

13. In February of 2007, when the first of those 146 clergy abuse survivors were on the doorstep of the first civil trial against the Diocese, the Diocese filed a Chapter 11 Bankruptcy as a tactic to avoid trial. The filing of the bankruptcy proceeding automatically stayed the imminent jury trial and halted all pending litigation in every other civil case.

14. While the filing of the bankruptcy caused all state court proceedings to come to a halt, it also required the Diocese to make a full and complete disclosure - under the penalty of perjury - of all of its assets including all real estate, cash and cash equivalents.

15. In an apparent effort to deceive the bankruptcy court and defraud the child abuse survivor creditors, the Diocese's required bankruptcy schedules omitted as assets of the Diocese: 1) nearly $100,000,000.00 in cash held in what it referred to as "the Diocesan Bank"; 2) hundreds of parcels of real property (although the deeds were titled in The Roman Catholic Bishop of San Diego, a corporation sole, or some variation of that

name); and 3) a $50,000,000 gift, which the Diocese conveniently converted to a loan just before filing for bankruptcy.

16. The Diocesan Bank was, in fact, several individual accounts held at Union Bank under the taxpayer identification of the Diocese. When the Diocese was questioned about its failure to disclose these funds in its bankruptcy schedules, it claimed that it was merely holding the funds in trust for the Parishes. On the other hand, when the Diocese had previously applied for construction financing to build Cathedral Catholic High School, the Diocese had represented to the lender, under oath, that the money in these individual accounts at Union Bank totaling the nearly $100,000,000.00 were assets of the Diocese.

17. During the bankruptcy proceedings, Union Bank advised Judge Louise DeCarl Adler that the Diocese was attempting to change the tax identification numbers of these accounts to the tax identification numbers of various parishes. Judge Adler summoned Diocesan officials to appear and threatened to hold them in contempt for attempting to transfer assets when, as a matter of law, all assets were frozen by the bankruptcy.

18. Judge Adler appointed a neutral auditor to investigate several suspicious transfers and other deceptive dealings by the Diocese which had occurred either during the bankruptcy or in contemplation of the bankruptcy. The auditor wrote a scathing report detailing attempts by some parish priests to hide money, the Diocese's efforts to seriously undervalue its properties, as well as its failure to account for certain interest income that belonged to the Diocese.

19. Prior to filing for bankruptcy, the Diocese had asked for and received a commitment for a $50,000,000 gift from the ALSAM foundation to help build Mater Dei Catholic High School. Years later, in contemplation of the bankruptcy, the Diocese converted the gift to a loan encumbered by the new school. Thus, the Diocese attempted

to convert a $50,000,000 asset into a debt, even though the terms of the loan permitted a forgiveness of the debt later.

20. Among the Diocese's real property holdings at the time of the bankruptcy were nearly 300 parcels of real property (which are the parcels at issue in this action) titled in the name of the Diocese. Despite holding title to these properties, the Diocese claimed it did not really own them, but instead held them in trust for its parishioners.

21. During 2003, when a flood of lawsuits were being filed by childhood sexual abuse survivors against the Diocese, its general counsel, Michael Webb, learned that attorney Irwin Zalkin would be filing lawsuits on behalf of dozens of clients against not only the Diocese, but also the individual parishes. Webb contacted Zalkin via email and advised that there was no need to name the parishes separately in any lawsuit because the "parishes are ours" referring to the Diocese.

22. As with the Webb email, the Diocese had successfully argued in litigation that it owned and controlled certain Parish property. In 1974, a group of Spanish-speaking parishioners used their own funds to purchase a parcel of land in Pauma Valley along Highway 76 with the intention of building a parish hall - Centro Guadalupano de Pauma Valley. The deed to the property was titled in the name of the Roman Catholic Bishop of San Diego and Centro Gaudalupano de Pauma Valley.

23. In 2003, the Diocese decided to transfer the property to Father Joe Carroll, president of S.V.D.P. Management, Inc., to develop affordable housing. In 2004, a group of parishioners sued the Diocese claiming that the property was theirs and was simply being held in the name of the Diocese for their benefit. The parishioners claimed the Diocese had no right to transfer their property. The Diocese sought and was granted summary judgment. The court held that the parishioners, even though their parish was on

the deed and they had located and purchased the real property, had no standing to sue. The Diocese was free to transfer title to the property.

24. Ultimately, on the eve of Judge Adler remanding numerous cases to the state court to proceed to trial, the Diocese settled 144 pending actions (unintentionally omitting two which settled later) for more than $198,000,000: an average of approximately $1,375,000 per case.

E. The Diocese's Efforts to Settle the Claims of Clergy Abuse Survivors For Pennies on the Dollar.

25. By January of 2019, it was a near certainty that the California Legislature would pass legislation to amend the statute of limitations applicable to claims based on childhood sexual assault. On January 16, 2019, Assemblywoman Lorena Gonzalez Fletcher introduced Assembly Bill 218 ("AB 218.") AB 218 would amend Code of Civil Procedure § 340.1 to create a three-year filing period for survivors of childhood sexual assault to commence civil actions. In practical effect, AB 218 ensured that Plaintiffs' Underlying Actions could proceed.

26. On April 1, 2019, AB 218 passed the Assembly by a vote of 64-3. AB 218 moved on to the Senate where it was passed by the Senate Judiciary Committee on July 2, 2019 by a vote of 7-1. On August 30, 2019, AB 218 passed from the Senate Appropriations Committee suspense file with a minor amendment. The Senate passed the amended version of AB 218 on September 14, 2019 by a vote of 33-0. That same day the Assembly voted 69-0 to concur in the amendments and send AB 218 on to the Governor for signature. On October 13, 2019, the Governor signed AB 218.

27. To provide some scale to the potential liability facing the Diocese by virtue of AB 218, consider Father Edward Anthony Rodrigue. On information and belief, Father Rodrigue was ordained in April of 1962 and assigned to Mary Star of the Sea Catholic

Church in La Jolla. Father Rodrigue continued to serve in various parish assignments with the Diocese until the Diocese of San Bernardino was formed in approximately 1978 and Father Rodrigue was transferred to the Diocese of San Bernardino.

28. Plaintiffs are informed and believe, and on that basis allege that Father Rodrigue was twice arrested for child molestation. During one of those prosecutions, Father Rodrigue admitted to molesting boys throughout the entirety of his time as a priest; likely more than 100 boys over the years.

29. Upon information and belief, approximately 31 of those boys had pursued lawsuits prior to January 1, 2020, meaning the Diocese potentially faced an additional 70 or more claims based on childhood sexual assault by Father Rodrigue alone.

30. In March of 2007, the Diocese published a list of clergy against whom it had received allegations of child molestation that it deemed "credible." That list was later amended and now includes at least 51 credibly accused clerics. The volume of potential AB 218 claimants was high.

31. Thus, with AB 218 moving through the Legislature, and substantial liability looming, the Diocese began taking steps to secure its financial position against the multitude of claims that it knew would be coming when AB 218 took effect. First, by August 13, 2018, the Diocese had announced that it was participating in what it called an "Independent Compensation Fund" for survivors of clergy sexual abuse. Through this "Independent Compensation Fund" which took effect in September of 2019 a survivor of childhood sexual abuse perpetrated by a priest of the Diocese could submit a claim form to be evaluated by an "independent" claim evaluator. If the claimant qualified for the program, a final settlement offer would be made. Individuals abused by non-priest employees of the Diocese, or by priests associated with religious orders, were not eligible for the program.

32. Plaintiffs are informed and believe and on that basis allege that the "Independent Compensation Fund" was designed to draw out individuals who would otherwise be eligible to bring a lawsuit pursuant to AB 218 and settle their claims for pennies on the dollar. Indeed, the fund administrator announced that as of January 17, 2020, 69 individuals had registered claims against the Diocese through the fund program, and 27 of those had submitted completed claim forms. The administrator expected additional applications and claims to be submitted in the ensuing 6 weeks that the claim filing period remained open. As of January 17, 2020, 18 such claims had been processed, and the program had authorized offers totaling $1,334,000: an average of $74,111 per complainant. On average, the offers by the "Independent Compensation Fund" were approximately 5% of the average settlement paid at the time of the Diocese's bankruptcy filing thirteen years earlier.

33. At the same time that the "Independent Compensation Fund" was becoming operational and the Senate was passing AB 218 on to the Governor in mid-September of 2019, the Diocese was engaged in a massive effort to transfer title to hundreds of millions of dollars of real property for no consideration. Plaintiffs are informed and believe and on that basis allege that this fraudulent scheme, which is described below and is the subject of this lawsuit, was intended to defraud Plaintiffs and others with claims based on clergy sexual abuse.

F. The Current Fraudulent Scheme

34. Plaintiffs believe and allege that all of the transfers described below were done as part of a scheme created, masterminded, and designed by Diocese and the Parishes for the Diocese to transfer properties to the Parishes so the assets of the Diocese are not reachable by the Diocese's creditors, particularly not reachable by Plaintiffs to satisfy Plaintiffs' Claims against the Diocese. The current fraudulent scheme involves the

transfer of at least 291 parcels of real property between September of 2019 and February of 2020. Plaintiffs are informed and believe and on that basis allege that the total assessed value of the transferred property is approximately $453,385,107.

1. ***Transfer of 6590 La Jolla Scenic Drive - Against the Diocese and All Hallows RPSC***

FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

35. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

36. Plaintiffs are informed and believe and thereupon allege that Defendant ALL HALLOWS PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("All Hallows RPSC") is a California religious corporation.

37. Prior to September 1, 2019, the Diocese acquired the real property at 6590 La Jolla Scenic Drive, La Jolla San Diego, 92037 ("6590 La Jolla Scenic Drive").

38. By Grant Deed recorded September 24, 2019, for no consideration, the Diocese transferred 6590 La Jolla Scenic Drive to All Hallows RPSC.

39. Plaintiffs believe and allege that on the date of the transfer of 6590 La Jolla Scenic Drive, as alleged in ¶38 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6590 La Jolla Scenic Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

40. Plaintiffs seek to set aside the transfer of 6590 La Jolla Scenic Drive.

41. Plaintiffs are entitled to recover from the Diocese and All Hallows RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

42. The Diocese and All Hallows RPSC did the things herein alleged maliciously and

to oppress the Diocese's creditors.

SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

43. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 35-42 of the First Cause of Action.

44. Plaintiffs believe that when 6590 La Jolla Scenic Drive was transferred, as alleged in ¶38 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6590 La Jolla Scenic Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

45. Plaintiffs are entitled to recover from the Diocese and All Hallows RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

46. The Diocese and All Hallows RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

2. ***Transfer of 6600 La Jolla Scenic Drive - Against the Diocese and All Hallows RPSC***

THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

47. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

48. Prior to September 1, 2019, the Diocese acquired the real property at 6600 La Jolla Scenic Drive, La Jolla San Diego, 92037 ("6600 La Jolla Scenic Drive").

49. By Grant Deed recorded December 10, 2019, for no consideration, the Diocese

transferred 6600 La Jolla Scenic Drive to All Hallows RPSC

50. Plaintiffs believe and allege that on the date of the transfer of 6600 La Jolla Scenic Drive, as alleged in ¶49 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6600 La Jolla Scenic Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

51. Plaintiffs seek to set aside the transfer of 6600 La Jolla Scenic Drive.

52. Plaintiffs are entitled to recover from the Diocese and All Hallows RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

53. The Diocese and All Hallows RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

54. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 47-53 of the Third Cause of Action.

55. Plaintiffs believe that when 6600 La Jolla Scenic Drive was transferred, as alleged in ¶49 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6600 La Jolla Scenic Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

56. Plaintiffs seek to set aside the transfer of 6600 La Jolla Scenic Drive.

57. Plaintiffs are entitled to recover from the Diocese and All Hallows RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

58. The Diocese and All Hallows RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

3. *Transfer of 11292 Clairemont Mesa Boulevard - Against the Diocese and Ascension RPSC*

FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

59. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

60. Plaintiffs are informed and believe and thereupon allege that Defendant ASCENSION CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Ascension RPSC") is a California religious corporation.

61. Prior to September 1, 2019, the Diocese acquired the real property at 11292 Clairemont Mesa Boulevard, San Diego 92124 ("11292 Clairemont Mesa Boulevard").

62. By Grant Deed recorded October 11, 2019, for no consideration, the Diocese transferred 11292 Clairemont Mesa Boulevard to Ascension RPSC.

63. Plaintiffs believe and allege that on the date of the transfer of 11292 Clairemont Mesa Boulevard, as alleged in ¶62 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 11292 Clairemont Mesa Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

64. Plaintiffs seek to set aside the transfer of 11292 Clairemont Mesa Boulevard.

65. Plaintiffs are entitled to recover from the Diocese and Ascension RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

66. The Diocese and Ascension RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

67. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 59-66 of the Fifth Cause of Action.

68. Plaintiffs believe that when 11292 Clairemont Mesa Boulevard was transferred, as alleged in ¶62 61-68 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 11292 Clairemont Mesa Boulevard was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

69. Plaintiffs seek to set aside the transfer of 11292 Clairemont Mesa Boulevard.

70. Plaintiffs are entitled to recover from the Diocese and Ascension RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

71. The Diocese and Ascension RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

4. ***Transfer of 5391 Outlook Point - Against the Diocese and Ascension RPSC***

SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

72. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

73. Prior to September 1, 2019, the Diocese acquired the real property at 5391 Outlook Point, San Diego 92124 ("5391 Outlook Point").

74. By Grant Deed recorded October 11, 2019 for no consideration, the Diocese transferred 5391 Outlook Point to Ascension RPSC.

75. Plaintiffs believe and allege that on the date of the transfer of 5391 Outlook Point, as alleged in ¶74 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5391 Outlook Point was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

76. Plaintiffs seek to set aside the transfer of 5391 Outlook Point.

77. Plaintiffs are entitled to recover from the Diocese and Ascension RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

78. The Diocese and Ascension RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

79. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 72-78 of the Seventh Cause of Action.

80. Plaintiffs believe that when 5391 Outlook Point was transferred, as alleged in ¶74 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5391 Outlook Point was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

81. Plaintiffs seek to set aside the transfer of 5391 Outlook Point.

82. Plaintiffs are entitled to recover from the Diocese and Ascension RPSC the full

amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

83. The Diocese and Ascension RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

5. ***Transfer of 4540 El Cerrito Drive - Against the Diocese and Blessed Sacrament RPSC***

NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

84. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

85. Plaintiffs are informed and believe and thereupon allege that Defendant BLESSED SACRAMENT CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Blessed Sacrament RPSC") is a California religious corporation.

86. Prior to September 1, 2019, the Diocese acquired the real property at 4540 El Cerrito Drive, San Diego, 92115 ("4540 El Cerrito Drive").

87. By Grant Deed recorded September 13, 2019, for no consideration, the Diocese transferred 4540 El Cerrito Drive to Blessed Sacrament RPSC.

88. Plaintiffs believe and allege that on the date of the transfer of 4540 El Cerrito Drive, as alleged in ¶87 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4540 El Cerrito Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

89. Plaintiffs seek to set aside the transfer of 4540 El Cerrito Drive.

90. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

91. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

92. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 84-91 of the Ninth Cause of Action.

93. Plaintiffs believe that when 4540 El Cerrito Drive was transferred, as alleged in ¶87 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4540 El Cerrito Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

94. Plaintiffs seek to set aside the transfer of 4540 El Cerrito Drive.

95. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

96. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

6. ***Transfer of 4510 El Cerrito Drive - Against the Diocese and Blessed Sacrament RPSC***

ELEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

97. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

98. Prior to September 1, 2019, the Diocese acquired the real property at 4510 El

Cerrito Drive, San Diego, 92115 ("4510 El Cerrito Drive").

99. By Grant Deed recorded December 2, 2020 for no consideration, the Diocese transferred 4510 El Cerrito Drive to Blessed Sacrament RPSC.

100. Plaintiffs believe and allege that on the date of the transfer of 4510 El Cerrito Drive, as alleged in ¶99 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4510 El Cerrito Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

101. Plaintiffs seek to set aside the transfer of 4510 El Cerrito Drive.

102. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

103. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWELFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

104. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 97-103 of the Eleventh Cause of Action.

105. Plaintiffs believe that when 4510 El Cerrito Drive was transferred, as alleged in ¶99 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4510 El Cerrito Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

106. Plaintiffs seek to set aside the transfer of 4510 El Cerrito Drive.

107. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

108. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

7. *Transfer of 4530 El Cerrito Drive - Against the Diocese and Blessed Sacrament RPSC*

THIRTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

109. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

110. Prior to September 1, 2019, the Diocese acquired the real property at 4530 El Cerrito Drive, San Diego, 92115 ("4530 El Cerrito Drive").

111. By Grant Deed recorded September 13, 2020 for no consideration, the Diocese transferred 4530 El Cerrito Drive to Blessed Sacrament RPSC.

112. Plaintiffs believe and allege that on the date of the transfer of 4530 El Cerrito Drive, as alleged in ¶111 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4530 El Cerrito Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

113. Plaintiffs seek to set aside the transfer of 4530 El Cerrito Drive.

114. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

115. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOURTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

116. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 109-115 of the Thirteenth Cause of Action.

117. Plaintiffs believe that when 4530 El Cerrito Drive was transferred, as alleged in ¶111 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4530 El Cerrito Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

118. Plaintiffs seek to set aside the transfer of 4530 El Cerrito Drive.

119. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

120. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

8. ***Transfer of 4525 56th Street - Against the Diocese and Blessed Sacrament RPSC***

FIFTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

121. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

122. Prior to September 1, 2019, the Diocese acquired the real property at 4525 56th Street, San Diego, 92115 ("4525 56th Street").

123. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4525 56th Street to Blessed Sacrament RPSC.

124. Plaintiffs believe and allege that on the date of the transfer of 4525 56th Street, as alleged in ¶123 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4525 56th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

125. Plaintiffs seek to set aside the transfer of 4525 56th Street.

126. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

127. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SIXTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

128. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 121-127 of the Fifteenth Cause of Action.

129. Plaintiffs believe that when 4525 56th Street was transferred, as alleged in ¶123 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4525 56th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

130. Plaintiffs seek to set aside the transfer of 4525 56th Street.

131. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

132. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

9. *Transfer of 4531 56th Street - Against the Diocese and Blessed Sacrament RPSC*

SEVENTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

133. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

134. Prior to September 1, 2019, the Diocese acquired the real property at 4531 56th Street, San Diego, 92115 ("4531 56th Street").

135. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4531 56th Street to Blessed Sacrament RPSC.

136. Plaintiffs believe and allege that on the date of the transfer of 4531 56th Street, as alleged in ¶135 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4531 56th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

137. Plaintiffs seek to set aside the transfer of 4531 56th Street.

138. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

139. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

EIGHTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

140. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 133-139 of the Seventeenth Cause of Action.

141. Plaintiffs believe that when 4531 56th Street was transferred, as alleged in ¶135 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4531 56th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

142. Plaintiffs seek to set aside the transfer of 4531 56th Street.

143. Plaintiffs are entitled to recover from the Diocese and Blessed Sacrament RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

144. The Diocese and Blessed Sacrament RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

10. ***Transfer of 450 Corral Canyon Road - Against the Diocese and Corpus Christi RPSC***

NINETEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

145. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34of the Preliminary Allegations.

146. Plaintiffs are informed and believe and thereupon allege that Defendant CORPUS CHRISTI CATHOLIC PARISH IN BONITA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Corpus Christi RPSC") is a California religious corporation.

147. Prior to September 1, 2019, the Diocese acquired the real property at 450 Corral Canyon Road, Bonita 91902 ("450 Corral Canyon Road").

148. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese

transferred 450 Corral Canyon Road to Corpus Christi RPSC.

149. Plaintiffs believe and allege that on the date of the transfer of 450 Corral Canyon Road, as alleged in ¶148 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 450 Corral Canyon Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

150. Plaintiffs seek to set aside the transfer of 450 Corral Canyon Road.

151. Plaintiffs are entitled to recover from the Diocese and Corpus Christi RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

152. The Diocese and Corpus Christi RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

153. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 145-152 of the Nineteenth Cause of Action.

154. Plaintiffs believe that when 450 Corral Canyon Road was transferred, as alleged in ¶148 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 450 Corral Canyon Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

155. Plaintiffs seek to set aside the transfer of 450 Corral Canyon Road.

156. Plaintiffs are entitled to recover from the Diocese and Corpus Christi RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

157. The Diocese and Corpus Christi RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

11. ***Transfer of 10350 Camino Ruiz - Against the Diocese and Good Shepherd RPSC***

TWENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

158. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

159. Plaintiffs are informed and believe and thereupon allege that Defendant GOOD SHEPHERD CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Good Shepherd RPSC") is a California religious corporation.

160. Prior to September 1, 2019, the Diocese acquired the real property at 10350 Camino Ruiz, San Diego 92126 ("10350 Camino Ruiz").

161. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 10350 Camino Ruiz to Good Shepherd RPSC.

162. Plaintiffs believe and allege that on the date of the transfer of 10350 Camino Ruiz, as alleged in ¶161 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 10350 Camino Ruiz was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

163. Plaintiffs seek to set aside the transfer of 10350 Camino Ruiz.

164. Plaintiffs are entitled to recover from the Diocese and Good Shepherd RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

165. The Diocese and Good Shepherd RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

166. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 158-165 of the Twenty-First Cause of Action.

167. Plaintiffs believe that when 10350 Camino Ruiz was transferred, as alleged in ¶161 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 10350 Camino Ruiz was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

168. Plaintiffs seek to set aside the transfer of 10350 Camino Ruiz.

169. Plaintiffs are entitled to recover from the Diocese and Good Shepherd RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

170. The Diocese and Good Shepherd RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

12. ***Transfer of 9310 Dalehurst Road - Against the Diocese and Guardian Angels RPSC***

TWENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

171. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

172. Plaintiffs are informed and believe and thereupon allege that Defendant GUARDIAN ANGELS CATHOLIC PARISH IN SANTEE, CALIFORNIA REAL

PROPERTY SUPPORT CORPORATION ("Guardian Angels RPSC") is a California religious corporation.

173. Prior to September 1, 2019, the Diocese acquired the real property at 9310 Dalehurst Road, Santee 92071 ("9310 Dalehurst Road").

174. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 9310 Dalehurst Road to Guardian Angels RPSC.

175. Plaintiffs believe and allege that on the date of the transfer of 9310 Dalehurst Road, as alleged in ¶174 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 9310 Dalehurst Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

176. Plaintiffs seek to set aside the transfer of 9310 Dalehurst Road.

177. Plaintiffs are entitled to recover from the Diocese and Guardian Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

178. The Diocese and Guardian Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

179. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 171-178 of the Twenty-Third Cause of Action.

180. Plaintiffs believe that when 9310 Dalehurst Road was transferred, as alleged in ¶174 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 9310 Dalehurst Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at

the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

181. Plaintiffs seek to set aside the transfer of 9310 Dalehurst Road.

182. Plaintiffs are entitled to recover from the Diocese and Guardian Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

183. The Diocese and Guardian Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

13. ***Transfer of 2755 55th Street - Against the Diocese and Holy Spirit RPSC***

TWENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

184. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

185. Plaintiffs are informed and believe and thereupon allege that Defendant HOLY SPIRIT CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Holy Spirit RPSC") is a California religious corporation.

186. Prior to September 1, 2019, the Diocese acquired the real property at 2755 55th Street, San Diego 92105 ("2755 55th Street").

187. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 2755 55th Street to Holy Spirit RPSC.

188. Plaintiffs believe and allege that on the date of the transfer of 2755 55th Street, as alleged in ¶187 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2755 55th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

189. Plaintiffs seek to set aside the transfer of 2755 55th Street.

190. Plaintiffs are entitled to recover from the Diocese and Holy Spirit RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

191. The Diocese and Holy Spirit RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

192. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 184-191 of the Twenty-Fifth Cause of Action.

193. Plaintiffs believe that when 2755 55th Street was transferred, as alleged in ¶187 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2755 55th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

194. Plaintiffs seek to set aside the transfer of 2755 55th Street.

195. Plaintiffs are entitled to recover from the Diocese and Holy Spirit RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

196. The Diocese and Holy Spirit RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

14. ***Transfer of 405 Ballard Street - Against the Diocese and Holy Trinity RPSC***

TWENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

197. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

198. Plaintiffs are informed and believe and thereupon allege that Defendant HOLY TRINITY CATHOLIC PARISH IN EL CAJON, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Holy Trinity RPSC") is a California religious corporation.

199. Prior to September 1, 2019, the Diocese acquired the real property at 405 Ballard Street, El Cajon 92019 ("405 Ballard Street").

200. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 405 Ballard Street to Holy Trinity RPSC.

201. Plaintiffs believe and allege that on the date of the transfer of 405 Ballard Street, as alleged in ¶200 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 405 Ballard Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

202. Plaintiffs seek to set aside the transfer of 405 Ballard Street.

203. Plaintiffs are entitled to recover from the Diocese and Holy Trinity RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

204. The Diocese and Holy Trinity RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

205. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 197-204 of the Twenty-Seventh Cause of Action.

206. Plaintiffs believe that when 405 Ballard Street was transferred, as alleged in ¶200 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 405 Ballard Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

207. Plaintiffs seek to set aside the transfer of 405 Ballard Street.

208. Plaintiffs are entitled to recover from the Diocese and Holy Trinity RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

209. The Diocese and Holy Trinity RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

15. ***Transfer of 2540 San Diego Avenue - Against the Diocese and Immaculate Conception RPSC***

TWENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

210. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

211. Plaintiffs are informed and believe and thereupon allege that Defendant IMMACULATE CONCEPTION CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Immaculate Conception RPSC") is a California religious corporation.

212. Prior to September 1, 2019, the Diocese acquired the real property at 2540 San Diego Avenue, San Diego 92110 ("2540 San Diego Avenue").

213. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 2540 San Diego Avenue to Immaculate Conception RPSC.

214. Plaintiffs believe and allege that on the date of the transfer of 2540 San Diego Avenue, as alleged in ¶213 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2540 San Diego Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

215. Plaintiffs seek to set aside the transfer of 2540 San Diego Avenue.

216. Plaintiffs are entitled to recover from the Diocese and Immaculate Conception RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

217. The Diocese and Immaculate Conception RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THIRTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

218. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 210-217 of the Twenty-Ninth Cause of Action.

219. Plaintiffs believe that when 2540 San Diego Avenue was transferred, as alleged in ¶213 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2540 San Diego Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

220. Plaintiffs seek to set aside the transfer of 2540 San Diego Avenue.

221. Plaintiffs are entitled to recover from the Diocese and Immaculate Conception

RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

222. The Diocese and Immaculate Conception RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

16. ***Transfer of 537 E Street - Against the Diocese and Immaculate Heart of Mary RPSC***

THIRTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

223. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

224. Plaintiffs are informed and believe and thereupon allege that Defendant IMMACULATE HEART OF MARY CATHOLIC PARISH IN RAMONA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Immaculate Heart of Mary RPSC") is a California religious corporation.

225. Prior to September 1, 2019, the Diocese acquired the real property at 537 E Street, Ramona 92065 ("537 E Street").

226. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 537 E Street to Immaculate Heart of Mary RPSC.

227. Plaintiffs believe and allege that on the date of the transfer of 537 E Street, as alleged in ¶226 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 537 E Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

228. Plaintiffs seek to set aside the transfer of 537 E Street.

229. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese

in the Underlying Actions, including any judgments awarded or entered.

230. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THIRTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

231. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 223-230 of the Thirty-First Cause of Action.

232. Plaintiffs believe that when 537 E Street was transferred, as alleged in ¶226 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 537 E Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

233. Plaintiffs seek to set aside the transfer of 537 E Street.

234. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

235. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

17. ***Transfer of 604 D Street - Against the Diocese and Immaculate Heart of Mary RPSC***

THRITY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

236. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

237. Prior to September 1, 2019, the Diocese acquired the real property at 604 D

Street, Ramona 92065 ("604 D Street").

238. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 604 D Street to Immaculate Heart of Mary RPSC.

239. Plaintiffs believe and allege that on the date of the transfer of 604 D Street, as alleged in ¶238 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 604 D Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

240. Plaintiffs seek to set aside the transfer of 604 D Street.

241. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

242. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THIRTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

243. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 236-242 of the Thirty-Third Cause of Action.

244. Plaintiffs believe that when 604 D Street was transferred, as alleged in ¶238 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 604 D Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

245. Plaintiffs seek to set aside the transfer of 604 D Street.

246. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

247. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

18. ***Transfer of 615 E Street - Against the Diocese and Immaculate Heart of Mary RPSC***

THIRTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

248. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

249. Prior to September 1, 2019, the Diocese acquired the real property at 615 E Street, Ramona 92065 ("615 E Street").

250. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 615 E Street to Immaculate Heart of Mary RPSC.

251. Plaintiffs believe and allege that on the date of the transfer of 615 E Street, as alleged in ¶250 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 615 E Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

252. Plaintiffs seek to set aside the transfer of 615 E Street.

253. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

254. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THIRTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

255. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 248-254 of the Thirty-Fifth Cause of Action.

256. Plaintiffs believe that when 615 E Street was transferred, as alleged in ¶250 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 615 E Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

257. Plaintiffs seek to set aside the transfer of 615 E Street.

258. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

259. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

19. ***Transfer of 411 6th Street - Against the Diocese and Immaculate Heart of Mary RPSC***

THIRTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

260. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

261. Prior to September 1, 2019, the Diocese acquired the real property at 411 6th Street, Ramona 92065 ("411 6th Street").

262. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 411 6th Street to Immaculate Heart of Mary RPSC.

263. Plaintiffs believe and allege that on the date of the transfer of 411 6th Street t, as alleged in ¶262 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 411 6th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

264. Plaintiffs seek to set aside the transfer of 411 6th Street.

265. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

266. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THIRTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

267. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 260-266 of the Thirty-Seventh Cause of Action.

268. Plaintiffs believe that when 411 6th Street was transferred, as alleged in ¶262 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 411 6th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

269. Plaintiffs seek to set aside the transfer of 411 6th Street.

270. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

271. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

20. *Transfer of 424 6th Street - Against the Diocese and Immaculate Heart of Mary RPSC*

THIRTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

272. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

273. Prior to September 1, 2019, the Diocese acquired the real property at 424 6th Street, Ramona 92065 ("424 6th Street").

274. By Grant Deed recorded September 25, 2019 for no consideration, the Diocese transferred 424 6th Street to Immaculate Heart of Mary RPSC.

275. Plaintiffs believe and allege that on the date of the transfer of 424 6th Street t, as alleged in ¶274 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 424 6th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

276. Plaintiffs seek to set aside the transfer of 424 6th Street.

277. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

278. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FORTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

279. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 272-278 of the Thirty-Ninth Cause of Action.

280. Plaintiffs believe that when 424 6th Street was transferred, as alleged in ¶274 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 424 6th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

281. Plaintiffs seek to set aside the transfer of 424 6th Street.

282. Plaintiffs are entitled to recover from the Diocese and Immaculate Heart of Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

283. The Diocese and Immaculate Heart of Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

21. ***Transfer of 7669 Girard Avenue - Against the Diocese and Mary Star of the Sea RPSC***

FORTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

284. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

285. Plaintiffs are informed and believe and thereupon allege that Defendant MARY STAR OF THE SEA CATHOLIC PARISH IN LA JOLLA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Mary, Star of the Sea RPSC") is a California religious corporation.

286. Prior to September 1, 2019, the Diocese acquired the real property at 7669 Girard Avenue, La Jolla 92037 ("7669 Girard Avenue").

287. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese

transferred 7669 Girard Avenue to Mary, Star of the Sea RPSC.

288. Plaintiffs believe and allege that on the date of the transfer of 7669 Girard Avenue, as alleged in ¶287 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7669 Girard Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

289. Plaintiffs seek to set aside the transfer of 7669 Girard Avenue.

290. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

291. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FORTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

292. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 284-291 of the Forty-First Cause of Action.

293. Plaintiffs believe that when 7669 Girard Avenue was transferred, as alleged in ¶287 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7669 Girard Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

294. Plaintiffs seek to set aside the transfer of 7669 Girard Avenue.

295. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

296. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

22. *Transfer of 7713 Girard Avenue - Against the Diocese and Mary Star of the Sea RPSC*

FORTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

297. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

298. Prior to September 1, 2019, the Diocese acquired the real property at 7713 Girard Avenue, La Jolla 92037 ("7713 Girard Avenue").

299. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 7713 Girard Avenue to Mary, Star of the Sea RPSC.

300. Plaintiffs believe and allege that on the date of the transfer of 7713 Girard Avenue, as alleged in ¶299 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7713 Girard Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

301. Plaintiffs seek to set aside the transfer of 7713 Girard Avenue.

302. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

303. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FORTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

304. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 297-303 of the Forty-Third Cause of Action.

305. Plaintiffs believe that when 7713 Girard Avenue was transferred, as alleged in ¶299 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7713 Girard Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

306. Plaintiffs seek to set aside the transfer of 7713 Girard Avenue.

307. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

308. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

23. ***Transfer of 7704 Herschel Ave - Against the Diocese and Mary, Star of the Sea RPSC***

FORTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

309. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

310. Prior to September 1, 2019, the Diocese acquired the real property at 7704 Herschel Avenue, La Jolla 92037 ("7704 Herschel Avenue").

311. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 7704 Herschel Avenue to Mary, Star of the Sea RPSC.

312. Plaintiffs believe and allege that on the date of the transfer of 7704 Herschel Avenue, as alleged in ¶311 above, creditors, including Plaintiffs, had outstanding claims

against the Diocese, for which it was indebted, and that the transfer of 7704 Herschel Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

313. Plaintiffs seek to set aside the transfer of 7704 Herschel Avenue.

314. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

315. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FORTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

316. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 309-315 of the Forty-Fifth Cause of Action.

317. Plaintiffs believe that when 7704 Herschel Avenue was transferred, as alleged in ¶311 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7704 Herschel Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

318. Plaintiffs seek to set aside the transfer of 7704 Herschel Avenue.

319. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

320. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

24. ***Transfer of 7654 Herschel Ave - Against the Diocese and Mary, Star of the Sea RPSC***

FORTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

321. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

322. Prior to September 1, 2019, the Diocese acquired the real property at 7654 Herschel Avenue, La Jolla 92037 ("7654 Herschel Avenue").

323. By Grant Deed recorded December 9, 2019 for no consideration, the Diocese transferred 7654 Herschel Avenue to Mary, Star of the Sea RPSC.

324. Plaintiffs believe and allege that on the date of the transfer of 7654 Herschel Avenue, as alleged in ¶323 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7654 Herschel Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

325. Plaintiffs seek to set aside the transfer of 7654 Herschel Avenue.

326. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

327. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FORTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

328. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 321-327 of the Forty-Seventh Cause of Action.

329. Plaintiffs believe that when 7654 Herschel Avenue was transferred, as alleged in

¶323 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7654 Herschel Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

330. Plaintiffs seek to set aside the transfer of 7654 Herschel Avenue.

331. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

332. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

25. ***Transfer of 7645 Herschel Ave - Against the Diocese and Mary, Star of the Sea RPSC***

FORTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

333. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

334. Prior to September 1, 2019, the Diocese acquired the real property at 7645 Herschel Avenue, La Jolla 92037 ("7645 Herschel Avenue").

335. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 7645 Herschel Avenue to Mary, Star of the Sea RPSC.

336. Plaintiffs believe and allege that on the date of the transfer of 7645 Herschel Avenue, as alleged in ¶335 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7645 Herschel Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

337. Plaintiffs seek to set aside the transfer of 7645 Herschel Avenue.

338. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

339. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIFTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

340. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 333-339 of the Forty-Ninth Cause of Action.

341. Plaintiffs believe that when 7645 Herschel Avenue was transferred, as alleged in ¶335 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7645 Herschel Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

342. Plaintiffs seek to set aside the transfer of 7645 Herschel Avenue.

343. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

344. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

26. Transfer of 609 Pier View Way - Against the Diocese and Saint Mary, Star of the Sea RPSC

FIFTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

345. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

346. Plaintiffs are informed and believe and thereupon allege that SAINT MARY, STAR OF THE SEA CATHOLIC PARISH IN OCEANSIDE, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Mary, Star of the Sea RPSC") is a California religious corporation.

347. Prior to September 1, 2019, the Diocese acquired the real property at 609 Pier View Way, Oceanside 92054 ("609 Pier View Way")

348. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 609 Pier View Way to Saint Mary, Star of the Sea RPSC.

349. Plaintiffs believe and allege that on the date of the transfer of 609 Pier View Way, as alleged in ¶348 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 609 Pier View Way was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

350. Plaintiffs seek to set aside the transfer of 609 Pier View Way.

351. Plaintiffs are entitled to recover from the Diocese and Saint Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

352. The Diocese and Saint Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIFTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

353. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 345-352 of the Fifth-First Cause of Action.

354. Plaintiffs believe that when 609 Pier View Way was transferred, as alleged in ¶348 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 609 Pier View Way was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

355. Plaintiffs seek to set aside the transfer of 609 Pier View Way.

356. Plaintiffs are entitled to recover from the Diocese and Saint Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

357. The Diocese and Saint Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

27. Transfer of 601 Pier View Way - Against the Diocese and Saint Mary, Star of the Sea RPSC

FIFTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

358. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

359. Prior to September 1, 2019, the Diocese acquired the real property at 601 Pier View Way, Oceanside 92054 ("601 Pier View Way")

360. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 601 Pier View Way to Saint Mary, Star of the Sea RPSC.

361. Plaintiffs believe and allege that on the date of the transfer of 601 Pier View Way, as alleged in ¶360 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 601 Pier View Way was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in

violation of Civil Code §3439.04(a)(1).

362. Plaintiffs seek to set aside the transfer of 601 Pier View Way.

363. Plaintiffs are entitled to recover from the Diocese and Saint Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

364. The Diocese and Saint Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIFTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

365. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 358-364 of the Fifty-Third Cause of Action.

366. Plaintiffs believe that when 601 Pier View Way was transferred, as alleged in ¶360 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 601 Pier View Way was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

367. Plaintiffs seek to set aside the transfer of 601 Pier View Way.

368. Plaintiffs are entitled to recover from the Diocese and Saint Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

369. The Diocese and Saint Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

28. Transfer of 211 N Freeman Street - Against the Diocese and Saint Mary, Star of the Sea RPSC

FIFTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

370. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

371. Prior to September 1, 2019, the Diocese acquired the real property at 211 N Freeman Street, Oceanside 92054 ("211 N Freeman Street")

372. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 211 N Freeman Street to Saint Mary, Star of the Sea RPSC.

373. Plaintiffs believe and allege that on the date of the transfer of 211 N Freeman Street, as alleged in ¶372 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 211 N Freeman Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

374. Plaintiffs seek to set aside the transfer of 211 N Freeman Street.

375. Plaintiffs are entitled to recover from the Diocese and Saint Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

376. The Diocese and Saint Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIFTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

377. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 370-376 of the Fifty-Fifth Cause of Action.

378. Plaintiffs believe that when 211 N Freeman Street was transferred, as alleged in

¶372 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 211 N Freeman Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

379. Plaintiffs seek to set aside the transfer of 211 N Freeman Street.

380. Plaintiffs are entitled to recover from the Diocese and Saint Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

381. The Diocese and Saint Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

29. Transfer of 515 Wisconsin Ave - Against the Diocese and Saint Mary, Star of the Sea RPSC

FIFTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

382. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

383. Prior to September 1, 2019, the Diocese acquired the real property at 515 Wisconsin Ave, Oceanside 92054 ("515 Wisconsin Ave")

384. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 515 Wisconsin Ave to Saint Mary, Star of the Sea RPSC.

385. Plaintiffs believe and allege that on the date of the transfer of 515 Wisconsin Ave, as alleged in ¶384 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 515 Wisconsin Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

386. Plaintiffs seek to set aside the transfer of 515 Wisconsin Ave.

387. Plaintiffs are entitled to recover from the Diocese and Saint Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

388. The Diocese and Saint Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIFTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

389. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 382-388 of the Fifty-Seventh Cause of Action.

390. Plaintiffs believe that when 515 Wisconsin Ave was transferred, as alleged in ¶384 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 515 Wisconsin Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

391. Plaintiffs seek to set aside the transfer of 515 Wisconsin Ave.

392. Plaintiffs are entitled to recover from the Diocese and Saint Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

393. The Diocese and Saint Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

30. ***Transfer of 10818 San Diego Mission Road - Against the Diocese and Mission San Diego De Alcalá RPSC***

FIFTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

394. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

395. Plaintiffs are informed and believe and thereupon allege that Defendant MISSION SAN DIEGO DE ALCALÁ CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Mission San Diego De Alcalá RPSC") is a California religious corporation.

396. Prior to September 1, 2019, the Diocese acquired the real property at 10818 San Diego Mission Road, San Diego 92108 ("10818 San Diego Mission Road").

397. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 10818 San Diego Mission Road to Mission San Diego De Alcalá RPSC.

398. Plaintiffs believe and allege that on the date of the transfer of 10818 San Diego Mission Road, as alleged in ¶397 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 10818 San Diego Mission Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

399. Plaintiffs seek to set aside the transfer of 10818 San Diego Mission Road.

400. Plaintiffs are entitled to recover from the Diocese and Mission San Diego De Alcalá RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

401. The Diocese and Mission San Diego De Alcalá RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SIXTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

402. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 394-401 of the Fifty-Ninth Cause of Action.

403. Plaintiffs believe that when 10818 San Diego Mission Road was transferred, as alleged in ¶397 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 10818 San Diego Mission Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

404. Plaintiffs seek to set aside the transfer of 10818 San Diego Mission Road.

405. Plaintiffs are entitled to recover from the Diocese and Mission San Diego de Acala RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

406. The Diocese and Mission San Diego De Alcalá RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

31. ***Transfer of 2639 Homedale Street - Against the Diocese and Mission San Diego De Alcalá RPSC***

SIXTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

407. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

408. Prior to September 1, 2019, the Diocese acquired the real property at 2639 Homedale Street, San Diego 92108 ("2639 Homedale Street").

409. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 2639 Homedale Street to Mission San Diego De Alcalá RPSC.

410. Plaintiffs believe and allege that on the date of the transfer of 2639 Homedale Street, as alleged in ¶409 above, creditors, including Plaintiffs, had outstanding claims

against the Diocese, for which it was indebted, and that the transfer of 2639 Homedale Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

411. Plaintiffs seek to set aside the transfer of 2639 Homedale Street.

412. Plaintiffs are entitled to recover from the Diocese and Mission San Diego De Alcalá RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

413. The Diocese and Mission San Diego De Alcalá RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SIXTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

414. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 407-413 of the Sixty-First Cause of Action.

415. Plaintiffs believe that when 2639 Homedale Street was transferred, as alleged in ¶409 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2639 Homedale Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

416. Plaintiffs seek to set aside the transfer of 2639 Homedale Street.

417. Plaintiffs are entitled to recover from the Diocese and Mission San Diego de Acala RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

418. The Diocese and Mission San Diego De Alcalá RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

32. ***Transfer of 1245 Fourth Avenue - Against the Diocese and Most Precious Blood RPSC***

SIXTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

419. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

420. Plaintiffs are informed and believe and thereupon allege that Defendant MOST PRECIOUS BLOOD CATHOLIC PARISH IN CHULA VISTA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Most Precious Blood RPSC") is a California religious corporation.

421. Prior to September 1, 2019, the Diocese acquired the real property at 1245 Fourth Avenue, Chula Vista 91911 ("1245 Fourth Avenue").

422. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1245 Fourth Avenue to Most Precious Blood RPSC.

423. Plaintiffs believe and allege that on the date of the transfer of 1245 Fourth Avenue, as alleged in ¶422 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1245 Fourth Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

424. Plaintiffs seek to set aside the transfer of 1245 Fourth Avenue.

425. Plaintiffs are entitled to recover from the Diocese and Most Precious Blood RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

426. The Diocese and Most Precious Blood RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SIXTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

427. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 419-426 of the Sixty-Third Cause of Action.

428. Plaintiffs believe that when 1245 Fourth Avenue was transferred, as alleged in ¶422 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1245 Fourth Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

429. Plaintiffs seek to set aside the transfer of 1245 Fourth Avenue.

430. Plaintiffs are entitled to recover from the Diocese and Most Precious Blood RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

431. The Diocese and Most Precious Blood RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

33. ***Transfer of 1239 Fourth Avenue - Against the Diocese and Most Precious Blood RPSC***

SIXTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

432. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

433. Prior to September 1, 2019 the Diocese acquired the real property at 1239 Fourth Avenue, Chula Vista 91911 ("1239 Fourth Avenue").

434. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 1239 Fourth Avenue to Most Precious Blood RPSC.

435. Plaintiffs believe and allege that on the date of the transfer of 1239 Fourth Avenue, as alleged in ¶434 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1239 Fourth Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

436. Plaintiffs seek to set aside the transfer of 1239 Fourth Avenue.

437. Plaintiffs are entitled to recover from the Diocese and Most Precious Blood RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

438. The Diocese and Most Precious Blood RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SIXTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

439. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 432-438 of the Sixty-Fifth Cause of Action.

440. Plaintiffs believe that when 1239 Fourth Avenue was transferred, as alleged in ¶434 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1239 Fourth Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

441. Plaintiffs seek to set aside the transfer of 1239 Fourth Avenue.

442. Plaintiffs are entitled to recover from the Diocese and Most Precious Blood RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

443. The Diocese and Most Precious Blood RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

34. ***Transfer of 6309 El Apajo - Against the Diocese and Nativity RPSC***

SIXTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

444. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

445. Plaintiffs are informed and believe and thereupon allege that Defendant CHURCH OF THE NATIVITY CATHOLIC PARISH IN RANCHO SANTA FE, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Nativity RPSC") is a California religious corporation.

446. Prior to September 1, 2019, the Diocese acquired the real property at 6309 El Apajo, Rancho Santa Fe 92067 ("6309 El Apajo").

447. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 6309 El Apajo to Nativity RPSC.

448. Plaintiffs believe and allege that on the date of the transfer of 6309 El Apajo, as alleged in ¶447 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6309 El Apajo was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

449. Plaintiffs seek to set aside the transfer of 6309 El Apajo.

450. Plaintiffs are entitled to recover from the Diocese and Nativity RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

451. The Diocese and Nativity RPSC did the things herein alleged maliciously and to

oppress the Diocese's creditors.

SIXTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

452. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 444-451 of the Sixty-Seventh Cause of Action.

453. Plaintiffs believe that when 6309 El Apajo was transferred, as alleged in ¶447 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6309 El Apajo was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

454. Plaintiffs seek to set aside the transfer of 6309 El Apajo.

455. Plaintiffs are entitled to recover from the Diocese and Nativity RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

456. The Diocese and Nativity RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

35. ***Transfer of 610 24th Street - Against the Diocese and Our Lady of Angels RPSC***

SIXTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

457. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

458. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF ANGELS CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Angels RPSC") is a California

religious corporation.

459. Prior to September 1, 2019, the Diocese acquired the real property at 610 24th Street, San Diego 92102 ("610 24th Street").

460. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 610 24th Street to Our Lady of Angels RPSC.

461. Plaintiffs believe and allege that on the date of the transfer of 610 24th Street, as alleged in ¶460 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 610 24th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

462. Plaintiffs seek to set aside the transfer of 610 24th Street.

463. Plaintiffs are entitled to recover from the Diocese and Our Lady of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

464. The Diocese and Our Lady of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SEVENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

465. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 457-464 of the Sixty-Ninth Cause of Action.

466. Plaintiffs believe that when 610 24th Street was transferred, as alleged in ¶460 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 610 24th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil

Code §3439.05.

467. Plaintiffs seek to set aside the transfer of 610 24th Street.

468. Plaintiffs are entitled to recover from the Diocese and Our Lady of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

469. The Diocese and Our Lady of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

36. ***Transfer of 655 22nd Street - Against the Diocese and Our Lady of Angels RPSC***

SEVENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

470. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

471. Prior to September 1, 2019, the Diocese acquired the real property at 655 22nd Street, San Diego 92102 ("655 22nd Street").

472. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 655 22nd Street to Our Lady of Angels RPSC.

473. Plaintiffs believe and allege that on the date of the transfer of 655 22nd Street, as alleged in ¶472 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 655 22nd Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

474. Plaintiffs seek to set aside the transfer of 655 22nd Street.

475. Plaintiffs are entitled to recover from the Diocese and Our Lady of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

476. The Diocese and Our Lady of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SEVENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

477. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 470-476 of the Seventy-First Cause of Action.

478. Plaintiffs believe that when 655 22nd Street was transferred, as alleged in ¶472 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 655 22nd Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

479. Plaintiffs seek to set aside the transfer of 655 22nd Street.

480. Plaintiffs are entitled to recover from the Diocese and Our Lady of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

481. The Diocese and Our Lady of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

37. ***Transfer of 2766 Navajo Road - Against the Diocese and Our Lady of Grace RPSC***

SEVENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

482. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

483. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF GRACE CATHOLIC PARISH IN EL CAJON, CALIFORNIA REAL

PROPERTY SUPPORT CORPORATION ("Our Lady of Grace RPSC") is a California religious corporation.

484. Prior to September 1, 2019, the Diocese acquired the real property at 2766 Navajo Road, El Cajon 92020 ("2766 Navajo Road").

485. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 2766 Navajo Road to Our Lady of Grace RPSC.

486. Plaintiffs believe and allege that on the date of the transfer of 2766 Navajo Road, as alleged in ¶485 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2766 Navajo Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

487. Plaintiffs seek to set aside the transfer of 2766 Navajo Road.

488. Plaintiffs are entitled to recover from the Diocese and Our Lady of Grace RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

489. The Diocese and Our Lady of Grace RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SEVENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

490. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 482-489 of the Seventy-Third Cause of Action.

491. Plaintiffs believe that when 2766 Navajo Road was transferred, as alleged in ¶485 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2766 Navajo Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the

time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

492. Plaintiffs seek to set aside the transfer of 2766 Navajo Road.

493. Plaintiffs are entitled to recover from the Diocese and Our Lady of Grace RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

494. The Diocese and Our Lady of Grace RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

38. *Transfer of 646 Medford Street - Against the Diocese and Our Lady of Grace RPSC*

SEVENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

495. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

496. Prior to September 1, 2019, the Diocese acquired the real property at 646 Medford Street, El Cajon 92020 ("646 Medford Street").

497. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 646 Medford Street to Our Lady of Grace RPSC.

498. Plaintiffs believe and allege that on the date of the transfer of 646 Medford Street, as alleged in ¶497 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 646 Medford Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

499. Plaintiffs seek to set aside the transfer of 646 Medford Street.

500. Plaintiffs are entitled to recover from the Diocese and Our Lady of Grace RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

501. The Diocese and Our Lady of Grace RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SEVENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

502. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 495-501 of the Seventy-Fifth Cause of Action.

503. Plaintiffs believe that when 646 Medford Street was transferred, as alleged in ¶497 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 646 Medford Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

504. Plaintiffs seek to set aside the transfer of 646 Medford Street.

505. Plaintiffs are entitled to recover from the Diocese and Our Lady of Grace RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

506. The Diocese and Our Lady of Grace RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

39. ***Transfer of 124 East Fifth Street - Against the Diocese and Our Lady of Guadalupe Calexico RPSC***

SEVENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

507. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

508. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF GUADALUPE CATHOLIC PARISH CALEXICO IN CALEXICO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Guadalupe Calexico RPSC") is a California religious corporation.

509. Prior to September 1, 2019, the Diocese acquired the real property at 124 East Fifth Street, Calexico 92231 ("124 East Fifth Street").

510. By Grant Deed recorded on September 20, 2019, for no consideration, the Diocese transferred 124 East Fifth Street to Our Lady of Guadalupe Calexico RPSC.

511. Plaintiffs believe and allege that on the date of the transfer of 124 East Fifth Street, as alleged in ¶510 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 124 East Fifth Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

512. Plaintiffs seek to set aside the transfer of 124 East Fifth Street.

513. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

514. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

SEVENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

515. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 507-514 of the Seventy-Seventh Cause of Action.

516. Plaintiffs believe that when 124 East Fifth Street was transferred, as alleged in ¶510 above, creditors, including Plaintiffs, had outstanding claims against the Diocese,

for which it was indebted, and that the transfer of 124 East Fifth Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

517. Plaintiffs seek to set aside the transfer of 124 East Fifth Street.

518. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

519. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

40. ***Transfer of 445 Rockwood Street - Against the Diocese and Our Lady of Guadalupe Calexico RPSC***

SEVENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

520. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

521. Prior to September 1, 2019, the Diocese acquired the real property at 445 Rockwood Street, Calexico ("445 Rockwood Street").

522. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 445 Rockwood Street to Our Lady of Guadalupe Calexico RPSC.

523. Plaintiffs believe and allege that on the date of the transfer of 445 Rockwood Street, as alleged in ¶522 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 445 Rockwood Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

524. Plaintiffs seek to set aside the transfer of 445 Rockwood Street.

525. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

526. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

EIGHTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

527. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 520-526 of the Seventy-Ninth Cause of Action.

528. Plaintiffs believe that when 445 Rockwood Street was transferred, as alleged in ¶522 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 445 Rockwood Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

529. Plaintiffs seek to set aside the transfer of 445 Rockwood Street.

530. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

531. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

41. ***Transfer of 429 Rockwood Street - Against the Diocese and Our Lady of Guadalupe Calexico RPSC***

EIGHTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

532. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

533. Prior to September 1, 2019, the Diocese acquired the real property at 429 Rockwood Street, Calexico ("429 Rockwood Street").

534. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 429 Rockwood Street to Our Lady of Guadalupe Calexico RPSC.

535. Plaintiffs believe and allege that on the date of the transfer of 429 Rockwood Street, as alleged in ¶534 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 429 Rockwood Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

536. Plaintiffs seek to set aside the transfer of 429 Rockwood Street.

537. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

538. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

EIGHTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

539. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 532-538 of the Eighty-First Cause of Action.

540. Plaintiffs believe that when 429 Rockwood Street was transferred, as alleged in ¶534 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 429 Rockwood Street was made

without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

541. Plaintiffs seek to set aside the transfer of 429 Rockwood Street.

542. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

543. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

42. *Transfer of 520 Rockwood Street - Against the Diocese and Our Lady of Guadalupe Calexico RPSC*

EIGHTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

544. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

545. Prior to September 1, 2019, the Diocese acquired the real property at 520 Rockwood Street, Calexico ("520 Rockwood Street").

546. By Grant Deed recorded December 13, 2019 for no consideration, the Diocese transferred 520 Rockwood Street to Our Lady of Guadalupe Calexico RPSC.

547. Plaintiffs believe and allege that on the date of the transfer of 520 Rockwood Street, as alleged in ¶546 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 520 Rockwood Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

548. Plaintiffs seek to set aside the transfer of 520 Rockwood Street.

549. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

550. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

EIGHTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

551. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 544-550 of the Eighty-Third Cause of Action.

552. Plaintiffs believe that when 520 Rockwood Street was transferred, as alleged in ¶546 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 520 Rockwood Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

553. Plaintiffs seek to set aside the transfer of 520 Rockwood Street.

554. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

555. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

43. ***Transfer of 536 Rockwood Street - Against the Diocese and Our Lady of Guadalupe Calexico RPSC***

EIGHTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

556. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

557. Prior to September 1, 2019, the Diocese acquired the real property at 536 Rockwood Street, Calexico ("536 Rockwood Street").

558. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 536 Rockwood Street to Our Lady of Guadalupe Calexico RPSC.

559. Plaintiffs believe and allege that on the date of the transfer of 536 Rockwood Street, as alleged in ¶558 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 536 Rockwood Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

560. Plaintiffs seek to set aside the transfer of 536 Rockwood Street.

561. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

562. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

EIGHTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

563. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 556-562 of the Eighty-Fifth Cause of Action.

564. Plaintiffs believe that when 536 Rockwood Street was transferred, as alleged in ¶558 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 536 Rockwood Street was made

without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

565. Plaintiffs seek to set aside the transfer of 536 Rockwood Street.

566. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

567. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

44. ***Transfer of 540 Rockwood Street - Against the Diocese and Our Lady of Guadalupe Calexico RPSC***

EIGHTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

568. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

569. Prior to September 1, 2019, the Diocese acquired the real property at 540 Rockwood Street, Calexico ("540 Rockwood Street").

570. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 540 Rockwood Street to Our Lady of Guadalupe Calexico RPSC.

571. Plaintiffs believe and allege that on the date of the transfer of 540 Rockwood Street, as alleged in ¶570 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 540 Rockwood Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

572. Plaintiffs seek to set aside the transfer of 540 Rockwood Street.

573. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

574. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

EIGHTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

575. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 568-574 of the Eighty-Seventh Cause of Action.

576. Plaintiffs believe that when 540 Rockwood Street was transferred, as alleged in ¶570 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 540 Rockwood Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

577. Plaintiffs seek to set aside the transfer of 540 Rockwood Street.

578. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

579. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

45. ***Transfer of 135 East 4th Street - Against the Diocese and Our Lady of Guadalupe Calexico RPSC***

EIGHTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

580. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

581. Prior to September 1, 2019, the Diocese acquired the real property at 135 East 4th Street, Calexico ("135 East 4th Street").

582. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 135 East 4th Street to Our Lady of Guadalupe Calexico RPSC.

583. Plaintiffs believe and allege that on the date of the transfer of 135 East 4th Street, as alleged in ¶582 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 135 East 4th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

584. Plaintiffs seek to set aside the transfer of 135 East 4th Street.

585. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

586. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

NINETIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

587. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 580-586 of the Eighty-Ninth Cause of Action.

588. Plaintiffs believe that when 135 East 4th Street was transferred, as alleged in ¶582 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 135 East 4th Street was made without the

Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

589. Plaintiffs seek to set aside the transfer of 135 East 4th Street.

590. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

591. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

46. *Transfer of 2116 Banda Avenue - Against the Diocese and Our Lady of Guadalupe Calexico RPSC*

NINETY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

592. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

593. Prior to September 1, 2019, the Diocese acquired the real property at 2116 Banda Avenue, Calexico ("2116 Banda Avenue").

594. By Grant Deed recorded December 5, 2019 for no consideration, the Diocese transferred 2116 Banda Avenue to Our Lady of Guadalupe Calexico RPSC.

595. Plaintiffs believe and allege that on the date of the transfer of 2116 Banda Avenue, as alleged in ¶594 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2116 Banda Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

596. Plaintiffs seek to set aside the transfer of 2116 Banda Avenue.

597. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

598. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

NINETY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

599. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 592-598 of the Ninety-First Cause of Action.

600. Plaintiffs believe that when 2116 Banda Avenue was transferred, as alleged in ¶594 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2116 Banda Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

601. Plaintiffs seek to set aside the transfer of 2116 Banda Avenue.

602. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

603. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

47. ***Transfer of 345 Anita Street - Against the Diocese and Our Lady of Guadalupe Chula Vista RPSC***

NINETY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

604. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

605. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF GUADALUPE CATHOLIC PARISH CHULA VISTA IN CHULA VISTA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Guadalupe Chula Vista RPSC") is a California religious corporation.

606. Prior to September 1, 2019, the Diocese acquired the real property at 345 Anita Street, Chula Vista ("345 Anita Street").

607. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 345 Anita Street to Our Lady of Guadalupe Chula Vista RPSC.

608. Plaintiffs believe and allege that on the date of the transfer of 345 Anita Street, as alleged in ¶607 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 345 Anita Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

609. Plaintiffs seek to set aside the transfer of 345 Anita Street.

610. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Chula Vista RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

611. The Diocese and Our Lady of Guadalupe Chula Vista RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

NINETY-FOURTH OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

612. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 604-611 of the Ninety-Third Cause of Action.

613. Plaintiffs believe that when 345 Anita Street was transferred, as alleged in ¶607 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 345 Anita Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

614. Plaintiffs seek to set aside the transfer of 345 Anita Street.

615. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Chula Vista RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

616. The Diocese and Our Lady of Guadalupe Chula Vista RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

48. ***Transfer of 46 East Main Street - Against the Diocese and Our Lady of Guadalupe El Centro RPSC***

NINETY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

617. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

618. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF GUADALUPE CATHOLIC PARISH EL CENTRO IN EL CENTRO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Guadalupe El Centro RPSC") is a California religious corporation.

619. Prior to September 1, 2019, the Diocese acquired the real property at 46 East Main Street, Heber CA 92249 ("46 East Main Street").

620. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 46 East Main Street to Our Lady of Guadalupe El Centro RPSC.

621. Plaintiffs believe and allege that on the date of the transfer of 46 East Main Street, as alleged in ¶620 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 46 East Main Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

622. Plaintiffs seek to set aside the transfer of 46 East Main Street.

623. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe El Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

624. The Diocese and Our Lady of Guadalupe El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

NINETY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

625. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 617-624 of the Ninety-Fifth Cause of Action.

626. Plaintiffs believe that when 46 East Main Street was transferred, as alleged in ¶620 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 46 East Main Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

627. Plaintiffs seek to set aside the transfer of 46 East Main Street.

628. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe El

Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

629. The Diocese and Our Lady of Guadalupe El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

49. *Transfer of 1770 Kearney Avenue - Against the Diocese and Our Lady of Guadalupe San Diego RPSC*

NINETY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

630. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

631. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF GUADALUPE CATHOLIC PARISH SAN DIEGO IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Guadalupe San Diego RPSC") is a California religious corporation.

632. Prior to September 1, 2019, the Diocese acquired the real property at 1770 Kearney Avenue, San Diego 92113 ("1770 Kearney Avenue").

633. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1770 Kearney Avenue to Our Lady of Guadalupe San Diego RPSC.

634. Plaintiffs believe and allege that on the date of the transfer of 1770 Kearney Avenue, as alleged in ¶633 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1770 Kearney Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

635. Plaintiffs seek to set aside the transfer of 1770 Kearney Avenue.

636. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

637. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

NINETY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

638. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 630-637 of the Ninety-Seventh Cause of Action.

639. Plaintiffs believe that when 1770 Kearney Avenue was transferred, as alleged in ¶633 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1770 Kearney Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

640. Plaintiffs seek to set aside the transfer of 1770 Kearney Avenue.

641. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

642. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

50. ***Transfer of 1724 Kearney Avenue - Against the Diocese and Our Lady of Guadalupe San Diego RPSC***

NINETY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

643. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

644. Prior to September 1, 2019, the Diocese acquired the real property at 1724 Kearney Avenue, San Diego 92113 ("1724 Kearney Avenue").

645. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1724 Kearney Avenue to Our Lady of Guadalupe San Diego RPSC.

646. Plaintiffs believe and allege that on the date of the transfer of 1724 Kearney Avenue, as alleged in ¶645 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1724 Kearney Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

647. Plaintiffs seek to set aside the transfer of 1724 Kearney Avenue.

648. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

649. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDREDTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

650. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 643-649 of the Ninety-Ninth Cause of Action.

651. Plaintiffs believe that when 1724 Kearney Avenue was transferred, as alleged in ¶645 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1724 Kearney Avenue was made

without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

652. Plaintiffs seek to set aside the transfer of 1724 Kearney Avenue.

653. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

654. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

51. ***Transfer of 745 Beardsley Street - Against the Diocese and Our Lady of Guadalupe San Diego RPSC***

ONE HUNDRED AND FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

655. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

656. Prior to September 1, 2019, the Diocese acquired the real property at 745 Beardsley Street, San Diego 92113 ("745 Beardsley Street").

657. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 745 Beardsley Street to Our Lady of Guadalupe San Diego RPSC.

658. Plaintiffs believe and allege that on the date of the transfer of 745 Beardsley Street, as alleged in ¶657 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 745 Beardsley Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

659. Plaintiffs seek to set aside the transfer of 745 Beardsley Street.

660. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

661. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

662. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 655-661 of the One Hundredth Cause of Action.

663. Plaintiffs believe that when 745 Beardsley Street was transferred, as alleged in ¶657 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 745 Beardsley Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

664. Plaintiffs seek to set aside the transfer of 745 Beardsley Street.

665. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

666. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

52. ***Transfer of 9136 Riverside Drive - Against the Diocese and Our Lady of Light RPSC***

ONE HUNDRED AND THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

667. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

668. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF LIGHT CATHOLIC PARISH IN DESCANSO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Light RPSC") is a California religious corporation.

669. Prior to September 1, 2019, the Diocese acquired the real property at 9136 Riverside Drive, Descanso 91916 ("9136 Riverside Drive").

670. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 9136 Riverside Drive to Our Lady of Light RPSC.

671. Plaintiffs believe and allege that on the date of the transfer of 9136 Riverside Drive, as alleged in ¶670 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 9136 Riverside Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

672. Plaintiffs seek to set aside the transfer of 9136 Riverside Drive.

673. Plaintiffs are entitled to recover from the Diocese and Our Lady of Light RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

674. The Diocese and Our Lady of Light RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

675. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 667-674 of the One Hundred And Third Cause of Action.

676. Plaintiffs believe that when 9136 Riverside Drive was transferred, as alleged in ¶670 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 9136 Riverside Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

677. Plaintiffs seek to set aside the transfer of 9136 Riverside Drive.

678. Plaintiffs are entitled to recover from the Diocese and Our Lady of Light RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

679. The Diocese and Our Lady of Light RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

53. ***Transfer of 13541 Stoney Creek Road - Against the Diocese and Our Lady of Mount Carmel RPSC***

ONE HUNDRED AND FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

680. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

681. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF MT. CARMEL CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Mount Carmel RPSC") is a California religious corporation.

682. Prior to September 1, 2019, the Diocese acquired the real property at 13541

Stoney Creek Road, San Diego 92129 ("13541 Stoney Creek Road").

683. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 13541 Stoney Creek Road to Our Lady of Mount Carmel RPSC.

684. Plaintiffs believe and allege that on the date of the transfer of 13541 Stoney Creek Road, as alleged in ¶683 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13541 Stoney Creek Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

685. Plaintiffs seek to set aside the transfer of 13541 Stoney Creek Road.

686. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

687. The Diocese and Our Lady of Mount Carmel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

688. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 680-687 of the One Hundred And Fifth Cause of Action.

689. Plaintiffs believe that when 13541 Stoney Creek Road was transferred, as alleged in ¶683 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13541 Stoney Creek Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

690. Plaintiffs seek to set aside the transfer of 13541 Stoney Creek Road.

691. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

692. The Diocese and Our Lady of Mount Carmel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

54. ***Transfer of 13545 Stoney Creek Road - Against the Diocese and Our Lady of Mount Carmel RPSC***

ONE HUNDRED AND SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

693. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

694. Prior to September 1, 2019, the Diocese acquired the real property at 13545 Stoney Creek Road, San Diego 92129 ("13545 Stoney Creek Road").

695. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 13541 Stoney Creek Road to Our Lady of Mount Carmel RPSC.

696. Plaintiffs believe and allege that on the date of the transfer of 13545 Stoney Creek Road, as alleged in ¶695 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13545 Stoney Creek Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

697. Plaintiffs seek to set aside the transfer of 13545 Stoney Creek Road.

698. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

699. The Diocese and Our Lady of Mount Carmel RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

700. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 693-699 of the One Hundred And Seventh Cause of Action.

701. Plaintiffs believe that when 13545 Stoney Creek Road was transferred, as alleged in ¶695 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13545 Stoney Creek Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

702. Plaintiffs seek to set aside the transfer of 13545 Stoney Creek Road.

703. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

704. The Diocese and Our Lady of Mount Carmel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

55. ***Transfer of 13208 Lakeshore Drive - Against the Diocese and Our Lady of Perpetual Help RPSC***

ONE HUNDRED AND NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

705. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

706. Plaintiffs are informed and believe and thereupon allege that Defendant OUR

LADY OF PERPETUAL HELP CATHOLIC PARISH LAKESIDE IN LAKESIDE, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Perpetual Help RPSC") is a California religious corporation.

707. Prior to September 1, 2019, the Diocese acquired the real property at 13208 Lakeshore Drive, Lakeside 92040 ("13208 Lakeshore Drive").

708. By Grant Deed recorded September 18, 2019, for no consideration, the Diocese transferred 13208 Lakeshore Drive to Our Lady of Perpetual Help RPSC.

709. Plaintiffs believe and allege that on the date of the transfer of 13208 Lakeshore Drive, as alleged in ¶708 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13208 Lakeshore Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

710. Plaintiffs seek to set aside the transfer of 13208 Lakeshore Drive.

711. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

712. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND TENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

713. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 705-712 of the One Hundred And Ninth Cause of Action.

714. Plaintiffs believe that when 13208 Lakeshore Drive was transferred, as alleged in ¶708 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13208 Lakeshore Drive was made

without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

715. Plaintiffs seek to set aside the transfer of 13208 Lakeshore Drive.

716. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

717. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

56. *Transfer of 9945 Pino Drive - Against the Diocese and Our Lady of Perpetual Help RPSC*

ONE HUNDRED AND ELEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

718. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

719. Prior to September 1, 2019, the Diocese acquired the real property at 9945 Pino Drive, Lakeside 92040 ("9945 Pino Drive").

720. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 9945 Pino Drive to Our Lady of Perpetual Help RPSC.

721. Plaintiffs believe and allege that on the date of the transfer of 9945 Pino Drive, as alleged in ¶721 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 9945 Pino Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

722. Plaintiffs seek to set aside the transfer of 9945 Pino Drive.

723. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help

RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

724. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND TWELFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

725. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 718-724 of the One Hundred And Eleventh Cause of Action.

726. Plaintiffs believe that when 9945 Pino Drive was transferred, as alleged in ¶721 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 9945 Pino Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

727. Plaintiffs seek to set aside the transfer of 9945 Pino Drive.

728. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

729. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

57. ***Transfer of 13238 Lakeshore Drive - Against the Diocese and Our Lady of Perpetual Help RPSC***

ONE HUNDRED AND THIRTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

730. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

731. Prior to September 1, 2019, the Diocese acquired the real property at 13238 Lakeshore Drive, Lakeside 92040 ("13238 Lakeshore Drive").

732. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 13238 Lakeshore Drive to Our Lady of Perpetual Help RPSC.

733. Plaintiffs believe and allege that on the date of the transfer of 13238 Lakeshore Drive, as alleged in ¶732 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13238 Lakeshore Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

734. Plaintiffs seek to set aside the transfer of 13238 Lakeshore Drive.

735. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

736. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FOURTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

737. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 730-736 of the One Hundred And Thirteenth Cause of Action.

738. Plaintiffs believe that when 13238 Lakeshore Drive was transferred, as alleged in ¶732 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13238 Lakeshore Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either

insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

739. Plaintiffs seek to set aside the transfer of 13238 Lakeshore Drive.

740. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

741. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

58. Transfer of 10011 Pino Drive - Against the Diocese and Our Lady of Perpetual Help RPSC

ONE HUNDRED AND FIFTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

742. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

743. Prior to September 1, 2019, the Diocese acquired the real property at 10011 Pino Drive, Lakeside 92040 ("10011 Pino Drive").

744. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 9945 Pino Drive to Our Lady of Perpetual Help RPSC.

745. Plaintiffs believe and allege that on the date of the transfer of 10011 Pino Drive, as alleged in ¶744 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 10011 Pino Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

746. Plaintiffs seek to set aside the transfer of 10011 Pino Drive.

747. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese

in the Underlying Actions, including any judgments awarded or entered.

748. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SIXTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

749. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 742-748 of the One Hundred And Fifteenth Cause of Action.

750. Plaintiffs believe that when 10011 Pino Drive was transferred, as alleged in ¶744 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 10011 Pino Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

751. Plaintiffs seek to set aside the transfer of 10011 Pino Drive.

752. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

753. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

59. ***Transfer of 4222 Jewell Street - Against the Diocese and Our Lady of Refuge RPSC***

ONE HUNDRED AND SEVENTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

754. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

755. Plaintiffs are informed and believe and thereupon allege that Defendant OUR

LADY OF REFUGE CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Refuge RPSC") is a California religious corporation.

756. Prior to September 1, 2019, the Diocese acquired the real property at 4222 Jewell Street, San Diego 92109 ("4222 Jewell Street").

757. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 4222 Jewell Street to Our Lady of Refuge RPSC.

758. Plaintiffs believe and allege that on the date of the transfer of 4222 Jewell Street, as alleged in ¶757 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4222 Jewell Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

759. Plaintiffs seek to set aside the transfer of 4222 Jewell Street.

760. Plaintiffs are entitled to recover from the Diocese and Our Lady of Refuge RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

761. The Diocese and Our Lady of Refuge RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND EIGHTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

762. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 754-761 of the One Hundred And Seventeenth Cause of Action.

763. Plaintiffs believe that when 4222 Jewell Street was transferred, as alleged in ¶757 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for

which it was indebted, and that the transfer of 4222 Jewell Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

764. Plaintiffs seek to set aside the transfer of 4222 Jewell Street.

765. Plaintiffs are entitled to recover from the Diocese and Our Lady of Refuge RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

766. The Diocese and Our Lady of Refuge RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

60. ***Transfer of 4212 Jewell Street - Against the Diocese and Our Lady of Refuge RPSC***

ONE HUNDRED AND NINETEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

767. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

768. Prior to September 1, 2019, the Diocese acquired the real property at 4212 Jewell Street, San Diego 92109 ("4212 Jewell Street").

769. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 4212 Jewell Street to Our Lady of Refuge RPSC.

770. Plaintiffs believe and allege that on the date of the transfer of 4212 Jewell Street, as alleged in ¶769 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4212 Jewell Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

771. Plaintiffs seek to set aside the transfer of 4212 Jewell Street.

772. Plaintiffs are entitled to recover from the Diocese and Our Lady of Refuge RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

773. The Diocese and Our Lady of Refuge RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND TWENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

774. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 767-773 of the One Hundred And Nineteenth Cause of Action.

775. Plaintiffs believe that when 4212 Jewell Street was transferred, as alleged in ¶769 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4212 Jewell Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

776. Plaintiffs seek to set aside the transfer of 4212 Jewell Street.

777. Plaintiffs are entitled to recover from the Diocese and Our Lady of Refuge RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

778. The Diocese and Our Lady of Refuge RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

61. ***Transfer of 1659 Columbia Street - Against the Diocese and Our Lady of the Rosary RPSC***

ONE HUNDRED AND TWENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

779. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

780. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF ROSARY CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Rosary RPSC") is a California religious corporation.

781. Prior to September 1, 2019, the Diocese acquired the real property at 1659 Columbia Street, San Diego 92101 ("1659 Columbia Street").

782. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 1659 Columbia Street to Our Lady of Rosary RPSC.

783. Plaintiffs believe and allege that on the date of the transfer of 1659 Columbia Street, as alleged in ¶782 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1659 Columbia Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

784. Plaintiffs seek to set aside the transfer of 1659 Columbia Street.

785. Plaintiffs are entitled to recover from the Diocese and Our Lady of Rosary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

786. The Diocese and Our Lady of Rosary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND TWENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

787. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 779-786 of the One Hundred And Twenty-First Cause of Action.

788. Plaintiffs believe that when 1659 Columbia Street was transferred, as alleged in ¶782 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1659 Columbia Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

789. Plaintiffs seek to set aside the transfer of 1659 Columbia Street.

790. Plaintiffs are entitled to recover from the Diocese and Our Lady of Rosary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

791. The Diocese and Our Lady of Rosary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

62. ***Transfer of 1629 Columbia Street - Against the Diocese and Our Lady of the Rosary RPSC***

ONE HUNDRED AND TWENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

792. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

793. Prior to September 1, 2019, the Diocese acquired the real property at 1629 Columbia Street, San Diego 92101 ("1629 Columbia Street").

794. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 1629 Columbia Street to Our Lady of Rosary RPSC.

795. Plaintiffs believe and allege that on the date of the transfer of 1629 Columbia Street, as alleged in ¶794 above, creditors, including Plaintiffs, had outstanding claims

against the Diocese, for which it was indebted, and that the transfer of 1629 Columbia Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

796. Plaintiffs seek to set aside the transfer of 1629 Columbia Street.

797. Plaintiffs are entitled to recover from the Diocese and Our Lady of Rosary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

798. The Diocese and Our Lady of Rosary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND TWENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

799. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 792-798 of the One Hundred And Twenty-Third Cause of Action.

800. Plaintiffs believe that when 1629 Columbia Street was transferred, as alleged in ¶794 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1629 Columbia Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

801. Plaintiffs seek to set aside the transfer of 1629 Columbia Street.

802. Plaintiffs are entitled to recover from the Diocese and Our Lady of Rosary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

803. The Diocese and Our Lady of Rosary RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

63. ***Transfer of 4177 Marlborough Avenue - Against the Diocese and Our Lady of the Sacred Heart RPSC***

ONE HUNDRED AND TWENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

804. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

805. Plaintiffs are informed and believe and thereupon allege that Defendant OUR LADY OF THE SACRED HEART CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of the Sacred Heart RPSC") is a California religious corporation.

806. Prior to September 1, 2019, the Diocese acquired the real property at 4177 Marlborough Avenue, San Diego 92105 ("4177 Marlborough Avenue").

807. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 4177 Marlborough Avenue to Our Lady of the Sacred Heart RPSC.

808. Plaintiffs believe and allege that on the date of the transfer of 4177 Marlborough Avenue, as alleged in ¶807 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4177 Marlborough Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

809. Plaintiffs seek to set aside the transfer of 4177 Marlborough Avenue.

810. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

811. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein

alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND TWENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

812. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 804-811 of the One Hundred And Twenty-Fifth Cause of Action.

813. Plaintiffs believe that when 4177 Marlborough Avenue was transferred, as alleged in ¶807 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4177 Marlborough Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

814. Plaintiffs seek to set aside the transfer of 4177 Marlborough Avenue.

815. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

816. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

64. ***Transfer of 4113 Marlborough Avenue - Against the Diocese and Our Lady of the Sacred Heart RPSC***

ONE HUNDRED AND TWENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

817. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

818. Prior to September 1, 2019, the Diocese acquired the real property at 4113

Marlborough Avenue, San Diego 92105 ("4113 Marlborough Avenue").

819. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4113 Marlborough Avenue to Our Lady of the Sacred Heart RPSC.

820. Plaintiffs believe and allege that on the date of the transfer of 4113 Marlborough Avenue, as alleged in ¶819 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4113 Marlborough Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

821. Plaintiffs seek to set aside the transfer of 4113 Marlborough Avenue.

822. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

823. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND TWENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

824. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 817-823 of the One Hundred And Twenty-Seventh Cause of Action.

825. Plaintiffs believe that when 4113 Marlborough Avenue was transferred, as alleged in ¶819 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4113 Marlborough Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

826. Plaintiffs seek to set aside the transfer of 4113 Marlborough Avenue.

827. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

828. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

65. ***Transfer of 4107 Marlborough Avenue - Against the Diocese and Our Lady of the Sacred Heart RPSC***

ONE HUNDRED AND TWENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

829. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

830. Prior to September 1, 2019, the Diocese acquired the real property at 4107 Marlborough Avenue, San Diego 92105 ("4107 Marlborough Avenue").

831. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4107 Marlborough Avenue to Our Lady of the Sacred Heart RPSC.

832. Plaintiffs believe and allege that on the date of the transfer of 4107 Marlborough Avenue, as alleged in ¶831 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4107 Marlborough Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

833. Plaintiffs seek to set aside the transfer of 4107 Marlborough Avenue.

834. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

835. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND THIRTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

836. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 829-835 of the One Hundred And Twenty-Ninth Cause of Action.

837. Plaintiffs believe that when 4107 Marlborough Avenue was transferred, as alleged in ¶831 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4107 Marlborough Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

838. Plaintiffs seek to set aside the transfer of 4107 Marlborough Avenue.

839. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

840. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

66. ***Transfer of 4106 42nd Street - Against the Diocese and Our Lady of the Sacred Heart RPSC***

ONE HUNDRED AND THIRTY FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

841. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

842. Prior to September 1, 2019, the Diocese acquired the real property at 4106 42nd Street, San Diego 92105 ("4106 42nd Street").

843. By Grant Deed recorded December 9, 2019 for no consideration, the Diocese transferred 4106 42nd Street to Our Lady of the Sacred Heart RPSC.

844. Plaintiffs believe and allege that on the date of the transfer of 4106 42nd Street, as alleged in ¶843 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4106 42nd Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

845. Plaintiffs seek to set aside the transfer of 4106 42nd Street.

846. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

847. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND THIRTY SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

848. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 841-847 of the One Hundred And Thirty First Cause of Action.

849. Plaintiffs believe that when 4106 42nd Street was transferred, as alleged in ¶843 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4106 42nd Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the

time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

850. Plaintiffs seek to set aside the transfer of 4106 42nd Street.

851. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

852. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

67. *Transfer of 2569 West Victoria Drive - Against the Diocese and Queen of Angels RPSC*

ONE HUNDRED AND THIRTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

853. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

854. Plaintiffs are informed and believe and thereupon allege that Defendant QUEEN OF ANGELS CATHOLIC PARISH IN ALPINE, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Queen of Angels RPSC") is a California religious corporation.

855. Prior to September 1, 2019, the Diocese acquired the real property at 2569 West Victoria Drive, Alpine 91901 ("2569 West Victoria Drive").

856. By Grant Deed recorded February 4, 2020 for no consideration, the Diocese transferred 2569 West Victoria Drive to Queen of Angels RPSC.

857. Plaintiffs believe and allege that on the date of the transfer of 2569 West Victoria Drive, as alleged in ¶856 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 12569 West Victoria Drive was made with the actual intent to hinder, delay, or defraud the creditors

of the Diocese in violation of Civil Code §3439.04(a)(1).

858. Plaintiffs seek to set aside the transfer of 2569 West Victoria Drive.

859. Plaintiffs are entitled to recover from the Diocese and Queen of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

860. The Diocese and Queen of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND THIRTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

861. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 853-860 of the One Hundred And Thirty-Third Cause of Action.

862. Plaintiffs believe that when 2569 West Victoria Drive was transferred, as alleged in ¶856 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2569 West Victoria Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

863. Plaintiffs seek to set aside the transfer of 2569 West Victoria Drive.

864. Plaintiffs are entitled to recover from the Diocese and Queen of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

865. The Diocese and Queen of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

68. ***Transfer of 2583 Victoria Circle - Against the Diocese and Queen of Angels RPSC***

ONE HUNDRED AND THIRTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

866. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

867. Prior to September 1, 2019, the Diocese acquired the real property at 2583 Victoria Circle, Alpine 91901 ("2583 Victoria Circle").

868. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 2583 Victoria Circle to Queen of Angels RPSC.

869. Plaintiffs believe and allege that on the date of the transfer of 2583 Victoria Circle, as alleged in ¶868 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2583 Victoria Circle was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

870. Plaintiffs seek to set aside the transfer of 2583 Victoria Circle.

871. Plaintiffs are entitled to recover from the Diocese and Queen of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

872. The Diocese and Queen of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND THIRTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

873. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 866-873 of the One Hundred And Thirty-Fifth Cause of Action.

874. Plaintiffs believe that when 2583 Victoria Circle was transferred, as alleged in

¶868 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2583 Victoria Circle was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

875. Plaintiffs seek to set aside the transfer of 2583 Victoria Circle.

876. Plaintiffs are entitled to recover from the Diocese and Queen of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

877. The Diocese and Queen of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

69. ***Transfer of 2754 Lobelia Road - Against the Diocese and Queen of Angels RPSC***

ONE HUNDRED AND THIRTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

878. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

879. Prior to September 1, 2019, the Diocese acquired the real property at 2754 Lobelia Road, Alpine 91901 ("2754 Lobelia Road").

880. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 2754 Lobelia Road to Queen of Angels RPSC.

881. Plaintiffs believe and allege that on the date of the transfer of 2754 Lobelia Road, as alleged in ¶880 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2754 Lobelia Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

882. Plaintiffs seek to set aside the transfer of 2754 Lobelia Road.

883. Plaintiffs are entitled to recover from the Diocese and Queen of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

884. The Diocese and Queen of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND THIRTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

885. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 878-884 of the One Hundred And Thirty-Seventh Cause of Action.

886. Plaintiffs believe that when 2754 Lobelia Road was transferred, as alleged in ¶880 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2754 Lobelia Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

887. Plaintiffs seek to set aside the transfer of 2754 Lobelia Road.

888. Plaintiffs are entitled to recover from the Diocese and Queen of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

889. The Diocese and Queen of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

70. ***Transfer of 1445 Conway Drive - Against the Diocese and Resurrection RPSC***

ONE HUNDRED AND THIRTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

890. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

891. Plaintiffs are informed and believe and thereupon allege that Defendant CHURCH OF THE RESURRECTION CATHOLIC PARISH IN ESCONDIDO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Resurrection RPSC") is a California religious corporation.

892. Prior to September 1, 2019, the Diocese acquired the real property at 1445 Conway Drive, Escondido 92027 ("1445 Conway Drive").

893. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1445 Conway Drive to Resurrection RPSC.

894. Plaintiffs believe and allege that on the date of the transfer of 1445 Conway Drive, as alleged in ¶893 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1445 Conway Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

895. Plaintiffs seek to set aside the transfer of 1445 Conway Drive.

896. Plaintiffs are entitled to recover from the Diocese and Resurrection RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

897. The Diocese and Resurrection RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FORTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

898. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 890-897 of the One Hundred And Thirty-Ninth Cause of Action.

899. Plaintiffs believe that when 1445 Conway Drive was transferred, as alleged in ¶893 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1445 Conway Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

900. Plaintiffs seek to set aside the transfer of 1445 Conway Drive.

901. Plaintiffs are entitled to recover from the Diocese and Resurrection RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

902. The Diocese and Resurrection RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

71. ***Transfer of 1500 Sheridan Place - Against the Diocese and Resurrection RPSC***

ONE HUNDRED AND FORTY FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

903. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

904. Prior to September 1, 2019, the Diocese acquired the real property at 1500 Sheridan Place, Escondido 92027 ("1500 Sheridan Place").

905. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1500 Sheridan Place to Resurrection RPSC.

906. Plaintiffs believe and allege that on the date of the transfer of 1500 Sheridan Place, as alleged in ¶905 above, creditors, including Plaintiffs, had outstanding claims

against the Diocese, for which it was indebted, and that the transfer of 1500 Sheridan Place was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

907. Plaintiffs seek to set aside the transfer of 1500 Sheridan Place.

908. Plaintiffs are entitled to recover from the Diocese and Resurrection RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

909. The Diocese and Resurrection RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FORTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

910. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 903-909 of the One Hundred And Forty-First Cause of Action.

911. Plaintiffs believe that when 1500 Sheridan Place was transferred, as alleged in ¶905 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1500 Sheridan Place was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

912. Plaintiffs seek to set aside the transfer of 1500 Sheridan Place.

913. Plaintiffs are entitled to recover from the Diocese and Resurrection RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

914. The Diocese and Resurrection RPSC did the things herein alleged maliciously and

to oppress the Diocese's creditors.

72. Transfer of 428 South Imperial Avenue - Against the Diocese and Sacred Heart Brawley RPSC

ONE HUNDRED AND FORTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

915. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

916. Plaintiffs are informed and believe and thereupon allege that Defendant SACRED HEART CATHOLIC PARISH BRAWLEY IN BRAWLEY, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Sacred Heart Brawley RPSC") is a California religious corporation.

917. Prior to September 1, 2019, the Diocese acquired the real property at 428 South Imperial Avenue, Brawley 92227 ("428 South Imperial Avenue").

918. By Grant Deed recorded February 3, 2020 for no consideration, the Diocese transferred 428 South Imperial Avenue to Sacred Heart Brawley RPSC.

919. Plaintiffs believe and allege that on the date of the transfer of 428 South Imperial Avenue, as alleged in ¶918 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 428 South Imperial Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

920. Plaintiffs seek to set aside the transfer of 428 South Imperial Avenue.

921. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Brawley RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

922. The Diocese and Sacred Heart Brawley RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FORTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

923. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 915-922 of the One Hundred And Forty-Third Cause of Action.

924. Plaintiffs believe that when 428 South Imperial Avenue was transferred, as alleged in ¶918 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 428 South Imperial Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

925. Plaintiffs seek to set aside the transfer of 428 Imperial Avenue.

926. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Brawley RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

927. The Diocese and Sacred Heart Brawley RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

73. ***Transfer of 640 South Imperial Avenue - Against the Diocese and Sacred Heart Brawley RPSC***

ONE HUNDRED AND FORTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

928. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

929. Prior to September 1, 2019, the Diocese acquired the real property at 640 South

Imperial Avenue, Brawley 92227 ("640 South Imperial Avenue").

930. By Grant Deed recorded September 26, 2019 for no consideration, the Diocese transferred 640 South Imperial Avenue to Sacred Heart Brawley RPSC.

931. Plaintiffs believe and allege that on the date of the transfer of 640 South Imperial Avenue, as alleged in ¶930 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 640 South Imperial Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

932. Plaintiffs seek to set aside the transfer of 640 South Imperial Avenue.

933. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Brawley RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

934. The Diocese and Sacred Heart Brawley RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FORTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

935. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 928-934 of the One Hundred And Forty-Fifth Cause of Action.

936. Plaintiffs believe that when 640 South Imperial Avenue was transferred, as alleged in ¶930 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 640 South Imperial Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

937. Plaintiffs seek to set aside the transfer of 640 Imperial Avenue.

938. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Brawley RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

939. The Diocese and Sacred Heart Brawley RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

74. ***Transfer of 431 J Street - Against the Diocese and Sacred Heart Brawley RPSC***

ONE HUNDRED AND FORTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

940. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

941. Prior to September 1, 2019, the Diocese acquired the real property at 431 J Street, Brawley 92227 ("431 J Street").

942. By Grant Deed recorded September 26, 2019 for no consideration, the Diocese transferred 431 J Street to Sacred Heart Brawley RPSC.

943. Plaintiffs believe and allege that on the date of the transfer of 431 J Street, as alleged in ¶941 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 431 J Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

944. Plaintiffs seek to set aside the transfer of 431 J Street.

945. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Brawley RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

946. The Diocese and Sacred Heart Brawley RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FORTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

947. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 940-946 of the One Hundred And Forty-Seventh Cause of Action.

948. Plaintiffs believe that when 431 J Street was transferred, as alleged in ¶941 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 431 J Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

949. Plaintiffs seek to set aside the transfer of 431 J Street.

950. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Brawley RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

951. The Diocese and Sacred Heart Brawley RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

75. ***Transfer of 29 32nd Street - Against the Diocese and Christ the King RPSC***

ONE HUNDRED AND FORTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

952. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

953. Plaintiffs are informed and believe and thereupon allege that Defendant CHRIST THE KING CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY

SUPPORT CORPORATION ("Christ the King RPSC") is a California religious corporation.

954. Prior to September 1, 2019, the Diocese acquired the real property at 29 32nd Street, San Diego, 92103 ("29 32nd Street").

955. By Grant Deed recorded September 13, 2019, for no consideration, the Diocese transferred 29 32nd Street to Christ the King RPSC.

956. Plaintiffs believe and allege that on the date of the transfer of 29 32nd Street, as alleged in ¶955 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 29 32nd Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

957. Plaintiffs seek to set aside the transfer of 29 32nd Street.

958. Plaintiffs are entitled to recover from the Diocese and Christ the King RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

959. The Diocese and Christ the King RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FIFTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

960. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 952-959 of the One Hundred And Forty-Ninth Cause of Action.

961. Plaintiffs believe that when 29 32nd Street was transferred, as alleged in ¶955 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 29 32nd Street was made without the

Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

962. Plaintiffs seek to set aside the transfer of 29 32nd Street.

963. Plaintiffs are entitled to recover from the Diocese and Christ the King RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

964. The Diocese and Christ the King RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

76. *Transfer of 672 B Avenue - Against the Diocese and Sacred Heart Coronado RPSC*

ONE HUNDRED AND FIFTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

965. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

966. Plaintiffs are informed and believe and thereupon allege that Defendant SACRED HEART CATHOLIC PARISH CORONADO IN CORONADO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Sacred Heart Coronado RPSC") is a California religious corporation.

967. Prior to September 1, 2019, the Diocese acquired the real property at 706 C Avenue, Coronado 92118 ("672 B Avenue"). By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 672 B Avenue to Sacred Heart Coronado RPSC.

968. Plaintiffs believe and allege that on the date of the transfer of 672 B Avenue, as alleged in ¶967 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 672 B Avenue was made with

the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

969. Plaintiffs seek to set aside the transfer of 672 B Avenue.

970. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Coronado RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

971. The Diocese and Sacred Heart Coronado RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FIFTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

972. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 965-971 of the One Hundred And Fifty-First Cause of Action.

973. Plaintiffs believe that when 672 B Avenue was transferred, as alleged in ¶967 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 672 B Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

974. Plaintiffs seek to set aside the transfer of 672 B Avenue.

975. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Coronado RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

976. The Diocese and Sacred Heart Coronado RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

77. *Transfer of 660 B Avenue - Against the Diocese and Sacred Heart RPSC*

ONE HUNDRED AND FIFTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

977. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

978. Prior to September 1, 2019, the Diocese acquired the real property at 660 B Avenue, Coronado 92118 ("660 B Avenue").

979. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 660 B Avenue to Sacred Heart Coronado RPSC.

980. Plaintiffs believe and allege that on the date of the transfer of 660 B Avenue, as alleged in ¶979 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 660 B Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

981. Plaintiffs seek to set aside the transfer of 660 B Avenue.

982. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Coronado RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

983. The Diocese and Sacred Heart Coronado RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FIFTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

984. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 977-983 of the One Hundred And Fifty Third Cause of Action.

985. Plaintiffs believe that when 660 B Avenue was transferred, as alleged in ¶979 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 660 B Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

986. Plaintiffs seek to set aside the transfer of 660 B Avenue.

987. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Coronado RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

988. The Diocese and Sacred Heart Coronado RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

78. ***Transfer of 706 C Avenue - Against the Diocese and Sacred Heart Coronado RPSC***

ONE HUNDRED AND FIFTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

989. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

990. Prior to September 1, 2019, the Diocese acquired the real property at 706 C Avenue, Coronado 92118 ("706 C Avenue").

991. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 706 C Avenue to Sacred Heart Coronado RPSC.

992. Plaintiffs believe and allege that on the date of the transfer of 706 C Avenue, as alleged in ¶991 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 706 C Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of

Civil Code §3439.04(a)(1).

993. Plaintiffs seek to set aside the transfer of 706 C Avenue.

994. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Coronado RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

995. The Diocese and Sacred Heart Coronado RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FIFTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

996. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 989-995 of the One Hundred And Fifty-Fifth Cause of Action.

997. Plaintiffs believe that when 706 C Avenue was transferred, as alleged in ¶991 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 706 C Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

998. Plaintiffs seek to set aside the transfer of 706 C Avenue.

999. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Coronado RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1000. The Diocese and Sacred Heart Coronado RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

79. ***Transfer of 4776 Saratoga Avenue - Against the Diocese and Sacred Heart San Diego RPSC***

ONE HUNDRED AND FIFTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1001. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1002. Plaintiffs are informed and believe and thereupon allege that Defendant SACRED HEART CATHOLIC PARISH SAN DIEGO IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Sacred Heart San Diego RPSC") is a California religious corporation.

1003. Prior to September 1, 2019, the Diocese acquired the real property at 4776 Saratoga Avenue, San Diego 92107 ("4776 Saratoga Avenue").

1004. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4776 Saratoga Avenue to Sacred Heart San Diego RPSC.

1005. Plaintiffs believe and allege that on the date of the transfer of 4776 Saratoga Avenue, as alleged in ¶1004 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4776 Saratoga Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1006. Plaintiffs seek to set aside the transfer of 4776 Saratoga Avenue.

1007. Plaintiffs are entitled to recover from the Diocese and Sacred Heart San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1008. The Diocese and Sacred Heart San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND FIFTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1009. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1001-1008 of the One Hundred And Fifty-Seventh Cause of Action.

1010. Plaintiffs believe that when 4776 Saratoga Avenue was transferred, as alleged in ¶1004 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4776 Saratoga Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1011. Plaintiffs seek to set aside the transfer of 4776 Saratoga Avenue.

1012. Plaintiffs are entitled to recover from the Diocese and Sacred Heart Coronado RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1013. The Diocese and Sacred Heart Coronado RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

80. ***Transfer of 4895 Saratoga Avenue - Against the Diocese and Sacred Heart San Diego RPSC***

ONE HUNDRED AND FIFTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1014. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1015. Prior to September 1, 2019, the Diocese acquired the real property at 4895 Saratoga Avenue, San Diego 92107 ("4895 Saratoga Avenue").

1016. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4895 Saratoga Avenue to Sacred Heart San Diego RPSC.

1017. Plaintiffs believe and allege that on the date of the transfer of 4895 Saratoga Avenue, as alleged in ¶1016 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4895 Saratoga Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1018. Plaintiffs seek to set aside the transfer of 4895 Saratoga Avenue.

1019. Plaintiffs are entitled to recover from the Diocese and Sacred Heart San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1020. The Diocese and Sacred Heart San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SIXTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1021. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1014-1020 of the One Hundred And Fifty Ninth Cause of Action.

1022. Plaintiffs believe that when 4895 Saratoga Avenue was transferred, as alleged in ¶1016 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4895 Saratoga Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1023. Plaintiffs seek to set aside the transfer of 4895 Saratoga Avenue.

1024. Plaintiffs are entitled to recover from the Diocese and Sacred Heart San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1025. The Diocese and Sacred Heart San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

81. ***Transfer of 2004 Sunset Cliffs Boulevard - Against the Diocese and Sacred Heart San Diego RPSC***

ONE HUNDRED AND SIXTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1026. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1027. Prior to September 1, 2019, the Diocese acquired the real property at 2004 Sunset Cliffs Boulevard, San Diego 92107 ("2004 Sunset Cliffs Boulevard").

1028. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 2004 Sunset Cliffs Boulevard to Sacred Heart San Diego RPSC.

1029. Plaintiffs believe and allege that on the date of the transfer of 2004 Sunset Cliffs Boulevard, as alleged in ¶1028 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2004 Sunset Cliffs Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1030. Plaintiffs seek to set aside the transfer of 2004 Sunset Cliffs Boulevard.

1031. Plaintiffs are entitled to recover from the Diocese and Sacred Heart San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1032. The Diocese and Sacred Heart San Diego RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SIXTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1033. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1026-1032 of the One Hundred And Sixty-First Cause of Action.

1034. Plaintiffs believe that when 2004 Sunset Cliffs Boulevard was transferred, as alleged in ¶1028 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2004 Sunset Cliffs Boulevard was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1035. Plaintiffs seek to set aside the transfer of 2004 Sunset Cliffs Boulevard.

1036. Plaintiffs are entitled to recover from the Diocese and Sacred Heart San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1037. The Diocese and Sacred Heart San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

82. ***Transfer of 2014 Sunset Cliffs Boulevard - Against the Diocese and Sacred Heart San Diego RPSC***

ONE HUNDRED AND SIXTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1038. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1039. Prior to September 1, 2019, the Diocese acquired the real property at 2014 Sunset

Cliffs Boulevard, San Diego 92107 ("2014 Sunset Cliffs Boulevard").

1040. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 2014 Sunset Cliffs Boulevard to Sacred Heart San Diego RPSC.

1041. Plaintiffs believe and allege that on the date of the transfer of 2014 Sunset Cliffs Boulevard, as alleged in ¶1040 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2014 Sunset Cliffs Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1042. Plaintiffs seek to set aside the transfer of 2014 Sunset Cliffs Boulevard.

1043. Plaintiffs are entitled to recover from the Diocese and Sacred Heart San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1044. The Diocese and Sacred Heart San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SIXTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1045. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1038-1044 of the One Hundred And Sixty-Third Cause of Action.

1046. Plaintiffs believe that when 2014 Sunset Cliffs Boulevard was transferred, as alleged in ¶1040 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2014 Sunset Cliffs Boulevard was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1047. Plaintiffs seek to set aside the transfer of 2014 Sunset Cliffs Boulevard.

1048. Plaintiffs are entitled to recover from the Diocese and Sacred Heart San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1049. The Diocese and Sacred Heart San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

83. ***Transfer of 2001 Sunset Cliffs Boulevard - Against the Diocese and Sacred Heart San Diego RPSC***

ONE HUNDRED AND SIXTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1050. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1051. Prior to September 1, 2019, the Diocese acquired the real property at 2001 Sunset Cliffs Boulevard, San Diego 92107 ("2001 Sunset Cliffs Boulevard").

1052. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 2001 Sunset Cliffs Boulevard to Sacred Heart San Diego RPSC.

1053. Plaintiffs believe and allege that on the date of the transfer of 2001 Sunset Cliffs Boulevard, as alleged in ¶1052 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2001 Sunset Cliffs Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1054. Plaintiffs seek to set aside the transfer of 2001 Sunset Cliffs Boulevard.

1055. Plaintiffs are entitled to recover from the Diocese and Sacred Heart San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1056. The Diocese and Sacred Heart San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SIXTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1057. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1050-1056 of the One Hundred And Sixty-Fifth Cause of Action.

1058. Plaintiffs believe that when 2001 Sunset Cliffs Boulevard was transferred, as alleged in ¶1052 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2001 Sunset Cliffs Boulevard was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1059. Plaintiffs seek to set aside the transfer of 2001 Sunset Cliffs Boulevard.

1060. Plaintiffs are entitled to recover from the Diocese and Sacred Heart San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1061. The Diocese and Sacred Heart Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

84. ***Transfer of 1140 Evergreen Street - Against the Diocese and Saint Agnes RPSC***

ONE HUNDRED AND SIXTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1062. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1063. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT

AGNES CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Agnes RPSC") is a California religious corporation.

1064. Prior to September 1, 2019, the Diocese acquired the real property at 1140 Evergreen Street, San Diego 92106 ("1140 Evergreen Street").

1065. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 1140 Evergreen Street to Saint Agnes RPSC.

1066. Plaintiffs believe and allege that on the date of the transfer of 1140 Evergreen Street, as alleged in ¶1065 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1140 Evergreen Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1067. Plaintiffs seek to set aside the transfer of 1140 Evergreen Street.

1068. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1069. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SIXTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1070. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1062-1069 of the One Hundred And Sixty-Seventh Cause of Action.

1071. Plaintiffs believe that when 1140 Evergreen Street was transferred, as alleged in ¶1065 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1140 Evergreen Street was made

without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1072. Plaintiffs seek to set aside the transfer of 1140 Evergreen Street.

1073. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1074. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

85. ***Transfer of 1145 Evergreen Street - Against the Diocese and Saint Agnes RPSC***

ONE HUNDRED AND SIXTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1075. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1076. Prior to September 1, 2019, the Diocese acquired the real property at 1145 Evergreen Street, San Diego 92106 ("1145 Evergreen Street").

1077. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1145 Evergreen Street to Saint Agnes RPSC.

1078. Plaintiffs believe and allege that on the date of the transfer of 1145 Evergreen Street, as alleged in ¶1077 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1145 Evergreen Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1079. Plaintiffs seek to set aside the transfer of 1145 Evergreen Street.

1080. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full

amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1081. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SEVENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1082. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1075-1081 of the One Hundred And Sixty-Ninth Cause of Action.

1083. Plaintiffs believe that when 1145 Evergreen Street was transferred, as alleged in ¶1077 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1145 Evergreen Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1084. Plaintiffs seek to set aside the transfer of 1145 Evergreen Street.

1085. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1086. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

86. ***Transfer of 1148 Evergreen Street - Against the Diocese and Saint Agnes RPSC***

ONE HUNDRED AND SEVENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1087. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

1088. Prior to September 1, 2019, the Diocese acquired the real property at 1148 Evergreen Street, San Diego 92106 ("1148 Evergreen Street").

1089. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1148 Evergreen Street to Saint Agnes RPSC.

1090. Plaintiffs believe and allege that on the date of the transfer of 1148 Evergreen Street, as alleged in ¶1089 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1148 Evergreen Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1091. Plaintiffs seek to set aside the transfer of 1148 Evergreen Street.

1092. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1093. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SEVENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1094. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1087-1093 of the One Hundred And Seventy-First Cause of Action.

1095. Plaintiffs believe that when 1148 Evergreen Street was transferred, as alleged in ¶1089 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1148 Evergreen Street was made without the Diocese receiving reasonably equivalent value and the Diocese was

either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1096. Plaintiffs seek to set aside the transfer of 1148 Evergreen Street.

1097. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1098. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

87. ***Transfer of 3144 Canon Street - Against the Diocese and Saint Agnes RPSC***

ONE HUNDRED AND SEVENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1099. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1100. Prior to September 1, 2019, the Diocese acquired the real property at 3144 Canon Street, San Diego 92106 ("3144 Canon Street").

1101. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 3144 Canon Street to Saint Agnes RPSC.

1102. Plaintiffs believe and allege that on the date of the transfer of 3144 Canon Street, as alleged in ¶1101 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3144 Canon Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1103. Plaintiffs seek to set aside the transfer of 3144 Canon Street.

1104. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

1105. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SEVENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1106. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1099-1105 of the One Hundred And Seventy-Third Cause of Action.

1107. Plaintiffs believe that when 3144 Canon Street was transferred, as alleged in ¶1101 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3144 Canon Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1108. Plaintiffs seek to set aside the transfer of 3144 Canon Street.

1109. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1110. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

88. ***Transfer of 2301 Irving Avenue - Against the Diocese and Saint Anne RPSC***

ONE HUNDRED AND SEVENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1111. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1112. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT ANNE CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Anne RPSC") is a California religious corporation.

1113. Prior to September 1, 2019, the Diocese acquired the real property 2301 Irving Avenue, San Diego 92113 ("2301 Irving Avenue").

1114. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 2301 Irving Avenue to Saint Anne RPSC.

1115. Plaintiffs believe and allege that on the date of the transfer of 2301 Irving Avenue, as alleged in ¶1114 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2301 Irving Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1116. Plaintiffs seek to set aside the transfer of 2301 Irving Avenue.

1117. Plaintiffs are entitled to recover from the Diocese and Saint Anne RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1118. The Diocese and Saint Anne RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SEVENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1119. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1111-1118 of the One Hundred And Seventy-Fifth Cause of Action.

1120. Plaintiffs believe that when 2301 Irving Avenue was transferred, as alleged in ¶1114 above, creditors, including Plaintiffs, had outstanding claims against the Diocese,

for which it was indebted, and that the transfer of 2301 Irving Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1121. Plaintiffs seek to set aside the transfer of 2301 Irving Avenue.

1122. Plaintiffs are entitled to recover from the Diocese and Saint Anne RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1123. The Diocese and Saint Anne RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

89. ***Transfer of 410 West 18th Street - Against the Diocese and Saint Anthony of Padua National City RPSC***

ONE HUNDRED AND SEVENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1124. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1125. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT ANTHONY OF PADUA CATHOLIC PARISH NATIONAL CITY IN NATIONAL CITY, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Anthony of Padua National City RPSC") is a California religious corporation.

1126. Prior to September 1, 2019, the Diocese acquired the real property 410 West 18th Street, National City 91950 ("410 West 18th Street").

1127. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 410 West 18th Street to Saint Anthony of Padua National City RPSC.

1128. Plaintiffs believe and allege that on the date of the transfer of 410 West 18th

Street, as alleged in ¶1127 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 410 West 18th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1129. Plaintiffs seek to set aside the transfer of 410 West 18th Street.

1130. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1131. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND SEVENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1132. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1124-1131 of the One Hundred And Seventy-Seventh Cause of Action.

1133. Plaintiffs believe that when 410 West 18th Street was transferred, as alleged in ¶1127 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 410 West 18th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1134. Plaintiffs seek to set aside the transfer of 410 West 18th Street.

1135. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims

against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1136. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

90. ***Transfer of 1798 Rio Vista Street - Against the Diocese and Saint Anthony of Padua Imperial RPSC***

ONE HUNDRED AND SEVENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1137. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1138. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT ANTHONY OF PADUA CATHOLIC PARISH IMPERIAL CITY IN IMPERIAL, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Anthony of Padua Imperial RPSC") is a California religious corporation.

1139. Prior to September 1, 2019, the Diocese acquired the real property 1798 Rio Vista Street, Imperial 92251 ("1798 Rio Vista Street").

1140. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 1798 Rio Vista Street to Saint Anthony of Padua Imperial RPSC.

1141. Plaintiffs believe and allege that on the date of the transfer of 1798 Rio Vista Street, as alleged in ¶1140 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1798 Rio Vista Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1142. Plaintiffs seek to set aside the transfer of 1798 Rio Vista Street.

1143. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua

Imperial RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1144. The Diocese and Saint Anthony of Padua Imperial RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND EIGHTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1145. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1137-1144 of the One Hundred And Seventy-Ninth Cause of Action.

1146. Plaintiffs believe that when 1798 Rio Vista Street was transferred, as alleged in ¶1140 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1798 Rio Vista Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1147. Plaintiffs seek to set aside the transfer of 1798 Rio Vista Street.

1148. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua Imperial RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1149. The Diocese and Saint Anthony of Padua Imperial RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

91. ***Transfer of 4735 Cass Street - Against the Diocese and Saint Brigid RPSC***

ONE HUNDRED AND EIGHTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1150. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

1151. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT BRIGID CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Brigid RPSC") is a California religious corporation.

1152. Prior to September 1, 2019, the Diocese acquired the real property at 4735 Cass Street, San Diego 92109 ("4735 Cass Street").

1153. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 4735 Cass Street to Saint Brigid RPSC.

1154. Plaintiffs believe and allege that on the date of the transfer of 4735 Cass Street, as alleged in ¶1153 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4735 Cass Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1155. Plaintiffs seek to set aside the transfer of 4735 Cass Street.

1156. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1157. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND EIGHTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1158. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1150-1157 of the One Hundred And Eighty-First Cause of Action.

1159. Plaintiffs believe that when 4735 Cass Street was transferred, as alleged in ¶1153

above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4735 Cass Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1160. Plaintiffs seek to set aside the transfer of 4735 Cass Street.

1161. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1162. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

92. ***Transfer of 4711 Cass Street - Against the Diocese and Saint Brigid RPSC***

ONE HUNDRED AND EIGHTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1163. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1164. Prior to September 1, 2019, the Diocese acquired the real property at 4711 Cass Street, San Diego 92109 ("4711 Cass Street").

1165. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 4711 Cass Street to Saint Brigid RPSC.

1166. Plaintiffs believe and allege that on the date of the transfer of 4711 Cass Street, as alleged in ¶1165 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4711 Cass Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1167. Plaintiffs seek to set aside the transfer of 4711 Cass Street.

1168. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1169. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND EIGHTY-FOURTH OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1170. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1163-1169 of the One Hundred And Eighty-Third Cause of Action.

1171. Plaintiffs believe that when 4711 Cass Street was transferred, as alleged in ¶1165 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4711 Cass Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1172. Plaintiffs seek to set aside the transfer of 4711 Cass Street.

1173. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1174. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

93. ***Transfer of 1045 Missouri Street - Against the Diocese and Saint Brigid RPSC***

ONE HUNDRED AND EIGHTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1175. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1176. Prior to September 1, 2019, the Diocese acquired the real property at 1045 Missouri Street, San Diego 92109 ("1045 Missouri Street").

1177. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 1045 Missouri Street to Saint Brigid RPSC.

1178. Plaintiffs believe and allege that on the date of the transfer of 1045 Missouri Street, as alleged in ¶1177 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1045 Missouri Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1179. Plaintiffs seek to set aside the transfer of 1045 Missouri Street.

1180. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1181. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND EIGHTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1182. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1175-1181 of the One Hundred And Eighty-Fifth Cause of Action.

1183. Plaintiffs believe that when 1045 Missouri Street was transferred, as alleged in ¶1177 above, creditors, including Plaintiffs, had outstanding claims against the Diocese,

for which it was indebted, and that the transfer of 1045 Missouri Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1184. Plaintiffs seek to set aside the transfer of 1045 Missouri Street.

1185. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1186. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

94. ***Transfer of 1005 Missouri Street - Against the Diocese and Saint Brigid RPSC***

ONE HUNDRED AND EIGHTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1187. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1188. Prior to September 1, 2019, the Diocese acquired the real property at 1005 Missouri Street, San Diego 92109 ("1005 Missouri Street").

1189. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 1005 Missouri Street to Saint Brigid RPSC.

1190. Plaintiffs believe and allege that on the date of the transfer of 1005 Missouri Street, as alleged in ¶1189 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1005 Missouri Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1191. Plaintiffs seek to set aside the transfer of 1005 Missouri Street.

1192. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1193. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND EIGHTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1194. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1187-1193 of the One Hundred And Eighty-Seventh Cause of Action.

1195. Plaintiffs believe that when 1005 Missouri Street was transferred, as alleged in ¶1189 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1005 Missouri Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1196. Plaintiffs seek to set aside the transfer of 1005 Missouri Street.

1197. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1198. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

95. ***Transfer of 4026 Mount Abraham Avenue - Against the Diocese and Saint Catherine Laboure RPSC***

ONE HUNDRED AND EIGHTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1199. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1200. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT CATHERINE LABOURE CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Catherine Laboure RPSC") is a California religious corporation.

1201. Prior to September 1, 2019, the Diocese acquired the real property at 4026 Mount Abraham Avenue, San Diego 92111 ("4026 Mount Abraham Avenue").

1202. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4026 Mount Abraham Avenue to Saint Catherine Laboure RPSC.

1203. Plaintiffs believe and allege that on the date of the transfer of 4026 Mount Abraham Avenue, as alleged in ¶1202 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4026 Mount Abraham Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1204. Plaintiffs seek to set aside the transfer of 4026 Mount Abraham Avenue.

1205. Plaintiffs are entitled to recover from the Diocese and Saint Catherine Laboure RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1206. The Diocese and Saint Catherine Laboure RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND NINETIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1207. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 1199-1206 of the One Hundred And Eighty-Ninth Cause of Action.

1208. Plaintiffs believe that when 4026 Mount Abraham Avenue was transferred, as alleged in ¶1202 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4026 Mount Abraham Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1209. Plaintiffs seek to set aside the transfer of 4026 Mount Abraham Avenue.

1210. Plaintiffs are entitled to recover from the Diocese and Saint Catherine Laboure RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1211. The Diocese and Saint Catherine Laboure RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

96. ***Transfer of 4038 Mount Abraham Avenue - Against the Diocese and Saint Catherine Laboure RPSC***

ONE HUNDRED AND NINETY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1212. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1213. Prior to September 1, 2019, the Diocese acquired the real property at 4038 Mount Abraham Avenue, San Diego 92111 ("4038 Mount Abraham Avenue").

1214. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4038 Mount Abraham Avenue to Saint Catherine Laboure RPSC.

1215. Plaintiffs believe and allege that on the date of the transfer of 4038 Mount

Abraham Avenue, as alleged in ¶1214 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4038 Mount Abraham Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1216. Plaintiffs seek to set aside the transfer of 4038 Mount Abraham Avenue.

1217. Plaintiffs are entitled to recover from the Diocese and Saint Catherine Laboure RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1218. The Diocese and Saint Catherine Laboure RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND NINETY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1219. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34of the Preliminary Allegations and 1212-1218 of the One Hundred And Ninety-First Cause of Action.

1220. Plaintiffs believe that when 4038 Mount Abraham Avenue was transferred, as alleged in ¶1214 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4038 Mount Abraham Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1221. Plaintiffs seek to set aside the transfer of 4038 Mount Abraham Avenue.

1222. Plaintiffs are entitled to recover from the Diocese and Saint Catherine Laboure RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1223. The Diocese and Saint Catherine Laboure RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

97. *Transfer of 5985 Mount Alifan Drive - Against the Diocese and Saint Catherine Laboure RPSC*

ONE HUNDRED AND NINETY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1224. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1225. Prior to September 1, 2019, the Diocese acquired the real property at 5985 Mount Alifan Drive, San Diego 92111 ("5985 Mount Alifan Drive").

1226. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 5985 Mount Alifan Drive to Saint Catherine Laboure RPSC.

1227. Plaintiffs believe and allege that on the date of the transfer of 5985 Mount Alifan Drive, as alleged in ¶1226 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5985 Mount Alifan Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1228. Plaintiffs seek to set aside the transfer of 5985 Mount Alifan Drive.

1229. Plaintiffs are entitled to recover from the Diocese and Saint Catherine Laboure RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1230. The Diocese and Saint Catherine Laboure RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND NINETY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1231. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1224-1230 of the One Hundred And Ninety-Third Cause of Action.

1232. Plaintiffs believe that when 5985 Mount Alifan Drive was transferred, as alleged in ¶1226 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5985 Mount Alifan Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1233. Plaintiffs seek to set aside the transfer of 5985 Mount Alifan Drive.

1234. Plaintiffs are entitled to recover from the Diocese and Saint Catherine Laboure RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1235. The Diocese and Saint Catherine Laboure RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

98. *Transfer of 2802 Cadiz Street - Against the Diocese and Saint Charles Borromeo RPSC*

ONE HUNDRED AND NINETY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1236. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1237. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT CHARLES OF BORROMEO CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Charles Borromeo RPSC") is a California religious corporation.

1238. Prior to September 1, 2019, the Diocese acquired the real property at 2802 Cadiz

Street, San Diego 92110 ("2802 Cadiz Street").

1239. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 2802 Cadiz Street to Saint Charles Borromeo RPSC.

1240. Plaintiffs believe and allege that on the date of the transfer of 2802 Cadiz Street, as alleged in ¶1239 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2802 Cadiz Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1241. Plaintiffs seek to set aside the transfer of 2802 Cadiz Street.

1242. Plaintiffs are entitled to recover from the Diocese and Saint Charles Borromeo RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1243. The Diocese and Saint Charles Borromeo RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND NINETY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1244. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1236-1243 of the One Hundred And Ninety-Fifth Cause of Action.

1245. Plaintiffs believe that when 2802 Cadiz Street was transferred, as alleged in ¶1239 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2802 Cadiz Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1246. Plaintiffs seek to set aside the transfer of 2802 Cadiz Street.

1247. Plaintiffs are entitled to recover from the Diocese and Saint Charles Borromeo RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1248. The Diocese and Saint Charles Borromeo RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

99. ***Transfer of 3030 Barnett Ave - Against the Diocese and Saint Charles Borromeo RPSC***

ONE HUNDRED AND NINETY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1249. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1250. Prior to September 1, 2019, the Diocese acquired the real property at 3030 Barnett Ave**,** San Diego 92110 ("3030 Barnett Ave").

1251. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 3030 Barnett Ave to Saint Charles Borromeo RPSC.

1252. Plaintiffs believe and allege that on the date of the transfer of 3030 Barnett Ave, as alleged in ¶1251 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3030 Barnett Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1253. Plaintiffs seek to set aside the transfer of 3030 Barnett Ave.

1254. Plaintiffs are entitled to recover from the Diocese and Saint Charles Borromeo RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1255. The Diocese and Saint Charles Borromeo RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

ONE HUNDRED AND NINETY EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1256. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1249-1255 of the One Hundred And Ninety-Seventh Cause of Action.

1257. Plaintiffs believe that when 3030 Barnett Ave was transferred, as alleged in ¶1251 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3030 Barnett Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1258. Plaintiffs seek to set aside the transfer of 3030 Barnett Ave.

1259. Plaintiffs are entitled to recover from the Diocese and Saint Charles Borromeo RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1260. The Diocese and Saint Charles Borromeo RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

100. ***Transfer of 990 Saturn Boulevard - Against the Diocese and Saint Charles RPSC***

ONE HUNDRED AND NINETY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1261. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1262. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT CHARLES CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY

SUPPORT CORPORATION ("Saint Charles RPSC") is a California religious corporation.

1263. Prior to September 1, 2019, the Diocese acquired the real property at 990 Saturn Boulevard, San Diego 92154 ("990 Saturn Boulevard").

1264. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 990 Saturn Boulevard to Saint Charles RPSC.

1265. Plaintiffs believe and allege that on the date of the transfer of 990 Saturn Boulevard, as alleged in ¶1264 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 990 Saturn Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1266. Plaintiffs seek to set aside the transfer of 990 Saturn Boulevard.

1267. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1268. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDREDTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1269. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1261-1268 of the One Hundred And Ninety-Ninth Cause of Action.

1270. Plaintiffs believe that when 990 Saturn Boulevard was transferred, as alleged in ¶1264 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 990 Saturn Boulevard was made

without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1271. Plaintiffs seek to set aside the transfer of 990 Saturn Boulevard.

1272. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1273. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

101. ***Transfer of 1002 Saturn Boulevard - Against the Diocese and Saint Charles RPSC***

TWO HUNDRED AND FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1274. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1275. Prior to September 1, 2019, the Diocese acquired the real property at 1002 Saturn Boulevard, San Diego 92154 ("1002 Saturn Boulevard").

1276. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 1002 Saturn Boulevard to Saint Charles RPSC.

1277. Plaintiffs believe and allege that on the date of the transfer of 1002 Saturn Boulevard, as alleged in ¶1276 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1002 Saturn Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1278. Plaintiffs seek to set aside the transfer of 1002 Saturn Boulevard.

1279. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full

amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1280. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1281. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1274-1280 of the Two Hundred And First Cause of Action.

1282. Plaintiffs believe that when 1002 Saturn Boulevard was transferred, as alleged in ¶1276 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1002 Saturn Boulevard was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1283. Plaintiffs seek to set aside the transfer of 1002 Saturn Boulevard.

1284. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1285. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

102. ***Transfer of 935 18th Street - Against the Diocese and Saint Charles RPSC***

TWO HUNDRED AND THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1286. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1287. Prior to September 1, 2019, the Diocese acquired the real property at 935 18th Street, San Diego 92154 ("935 18th Street").

1288. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 935 18th Street to Saint Charles RPSC.

1289. Plaintiffs believe and allege that on the date of the transfer of 935 18th Street, as alleged in ¶1288 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 935 18th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1290. Plaintiffs seek to set aside the transfer of 935 18th Street.

1291. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1292. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1293. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1286-1292 of the Two Hundred and Third Cause of Action.

1294. Plaintiffs believe that when 935 18th Street was transferred, as alleged in ¶1288 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 935 18th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1295. Plaintiffs seek to set aside the transfer of 935 18th Street.

1296. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1297. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

103. ***Transfer of 1808 Elder Ave - Against the Diocese and Saint Charles RPSC***

TWO HUNDRED AND FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1298. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1299. Prior to September 1, 2019, the Diocese acquired the real property at 1808 Elder Ave, San Diego 92154 ("1808 Elder Ave").

1300. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1808 Elder Ave to Saint Charles RPSC.

1301. Plaintiffs believe and allege that on the date of the transfer of 1808 Elder Ave, as alleged in ¶1300 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1808 Elder Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1302. Plaintiffs seek to set aside the transfer of 1808 Elder Ave.

1303. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1304. The Diocese and Saint Charles RPSC did the things herein alleged maliciously

and to oppress the Diocese's creditors.

TWO HUNDRED AND SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1305. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1298-1304 of the Two Hundred and Fifth Cause of Action.

1306. Plaintiffs believe that when 1808 Elder Ave was transferred, as alleged in ¶1300 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1808 Elder Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1307. Plaintiffs seek to set aside the transfer of 1808 Elder Ave.

1308. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1309. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

104. ***Transfer of 3390 Glencolum Drive - Against the Diocese and Saint Columba RPSC***

TWO HUNDRED AND SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1310. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1311. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT COLUMBA CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Columba RPSC") is a California religious

corporation.

1312. Prior to September 1, 2019, the Diocese acquired the real property at 3390 Glencolum Drive, San Diego 92123 ("3390 Glencolum Drive").

1313. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 3390 Glencolum Drive to Saint Columba RPSC.

1314. Plaintiffs believe and allege that on the date of the transfer of 3390 Glencolum Drive, as alleged in ¶1313 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3390 Glencolum Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1315. Plaintiffs seek to set aside the transfer of 3390 Glencolum Drive.

1316. Plaintiffs are entitled to recover from the Diocese and Saint Columba RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1317. The Diocese and Saint Columba RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1318. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1310-1317 of the Two Hundred And Seventh Cause of Action.

1319. Plaintiffs believe that when 3390 Glencolum Drive was transferred, as alleged in ¶1313 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3390 Glencolum Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either

insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1320. Plaintiffs seek to set aside the transfer of 3390 Glencolum Drive.

1321. Plaintiffs are entitled to recover from the Diocese and Saint Columba RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1322. The Diocese and Saint Columba RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

105. ***Transfer of 4752 Felton Street - Against the Diocese and Saint Didacus RPSC***

TWO HUNDRED AND NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1323. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1324. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT DIDACUS CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Didacus RPSC") is a California religious corporation.

1325. Prior to September 1, 2019, the Diocese acquired the real property at 4752 Felton Street, San Diego 92116 ("4752 Felton Street").

1326. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 4752 Felton Street to Saint Didacus RPSC.

1327. Plaintiffs believe and allege that on the date of the transfer of 4752 Felton Street, as alleged in ¶1326 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4752 Felton Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in

violation of Civil Code §3439.04(a)(1).

1328. Plaintiffs seek to set aside the transfer of 4752 Felton Street.

1329. Plaintiffs are entitled to recover from the Diocese and Saint Didacus RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1330. The Diocese and Saint Didacus RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND TENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1331. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1323-1330 of the Two Hundred And Ninth Cause of Action.

1332. Plaintiffs believe that when 4752 Felton Street was transferred, as alleged in ¶1326 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4752 Felton Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1333. Plaintiffs seek to set aside the transfer of 4752 Felton Street.

1334. Plaintiffs are entitled to recover from the Diocese and Saint Didacus RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1335. The Diocese and Saint Didacus RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

106. ***Transfer of 4771 Felton Street - Against the Diocese and Saint Didacus RPSC***

TWO HUNDRED AND ELEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1336. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1337. Prior to September 1, 2019, the Diocese acquired the real property at 4771 Felton Street, San Diego 92116 ("4771 Felton Street").

1338. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4771 Felton Street to Saint Didacus RPSC.

1339. Plaintiffs believe and allege that on the date of the transfer of 4771 Felton Street, as alleged in ¶1338 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4771 Felton Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1340. Plaintiffs seek to set aside the transfer of 4771 Felton Street.

1341. Plaintiffs are entitled to recover from the Diocese and Saint Didacus RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1342. The Diocese and Saint Didacus RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND TWELFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1343. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1336-1342 of the Two Hundred And Eleventh Cause of Action.

1344. Plaintiffs believe that when 4771 Felton Street was transferred, as alleged in ¶1338 above, creditors, including Plaintiffs, had outstanding claims against the Diocese,

for which it was indebted, and that the transfer of 4771 Felton Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1345. Plaintiffs seek to set aside the transfer of 4771 Felton Street.

1346. Plaintiffs are entitled to recover from the Diocese and Saint Didacus RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1347. The Diocese and Saint Didacus RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

107. ***Transfer of 4621 Felton Street - Against the Diocese and Saint Didacus RPSC***

TWO HUNDRED AND THIRTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1348. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1349. Prior to September 1, 2019, the Diocese acquired the real property at 4621 Felton Street, San Diego 92116 ("4621 Felton Street").

1350. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4621 Felton Street to Saint Didacus RPSC.

1351. Plaintiffs believe and allege that on the date of the transfer of 4621 Felton Street, as alleged in ¶1350 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4621 Felton Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1352. Plaintiffs seek to set aside the transfer of 4621 Felton Street.

1353. Plaintiffs are entitled to recover from the Diocese and Saint Didacus RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1354. The Diocese and Saint Didacus RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FOURTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1355. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1348-1354 of the Two Hundred And Thirteenth Cause of Action.

1356. Plaintiffs believe that when 4621 Felton Street was transferred, as alleged in ¶1350 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4621 Felton Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1357. Plaintiffs seek to set aside the transfer of 4621 Felton Street.

1358. Plaintiffs are entitled to recover from the Diocese and Saint Didacus RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1359. The Diocese and Saint Didacus RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

108. ***Transfer of 4604 34th Street - Against the Diocese and Saint Didacus RPSC***

TWO HUNDRED AND FIFTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1360. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1361. Prior to September 1, 2019, the Diocese acquired the real property at 4604 34th Street, San Diego 92116 ("4604 34th Street").

1362. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4604 34th Street to Saint Didacus RPSC.

1363. Plaintiffs believe and allege that on the date of the transfer of 4604 34th Street, as alleged in ¶1362 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4604 34th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1364. Plaintiffs seek to set aside the transfer of 4604 34th Street.

1365. Plaintiffs are entitled to recover from the Diocese and Saint Didacus RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1366. The Diocese and Saint Didacus RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SIXTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1367. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1360-1366 of the Two Hundred And Fifteenth Cause of Action.

1368. Plaintiffs believe that when 4604 34th Street was transferred, as alleged in ¶1362 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for

which it was indebted, and that the transfer of 4604 34th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1369. Plaintiffs seek to set aside the transfer of 4604 34th Street.

1370. Plaintiffs are entitled to recover from the Diocese and Saint Didacus RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1371. The Diocese and Saint Didacus RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

109. ***Transfer of 2811 B Street - Against the Diocese and Saint Elizabeth of Hungary RPSC***

TWO HUNDRED AND SEVENTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1372. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1373. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT ELIZABETH OF HUNGARY CATHOLIC PARISH IN JULIAN, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Elizabeth of Hungary RPSC") is a California religious corporation.

1374. Prior to September 1, 2019, the Diocese acquired the real property at 2811 B Street, Julian, 92036 ("2811 B Street").

1375. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 2811 B Street to Saint Elizabeth of Hungary RPSC.

1376. Plaintiffs believe and allege that on the date of the transfer of 2811 B Street, as alleged in ¶1375 above, creditors, including Plaintiffs, had outstanding claims against the

Diocese, for which it was indebted, and that the transfer of 2811 B Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1377. Plaintiffs seek to set aside the transfer of 2811 B Street.

1378. Plaintiffs are entitled to recover from the Diocese and Saint Elizabeth of Hungary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1379. The Diocese and Saint Elizabeth of Hungary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND EIGHTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1380. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1372-1379 of the Two Hundred And Seventeenth Cause of Action.

1381. Plaintiffs believe that when 2811 B Street was transferred, as alleged in ¶1375 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2811 B Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1382. Plaintiffs seek to set aside the transfer of 2811 B Street.

1383. Plaintiffs are entitled to recover from the Diocese and Saint Elizabeth of Hungary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1384. The Diocese and Saint Elizabeth of Hungary RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

110. ***Transfer of 6628 Santa Isabel Street - Against the Diocese and Saint Elizabeth Seton Catholic Parish RPSC***

TWO HUNDRED AND NINETEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1385. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1386. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT ELIZABETH SETON CATHOLIC PARISH IN CARLSBAD, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Elizabeth Seton RPSC") is a California religious corporation.

1387. Prior to September 1, 2019, the Diocese acquired the real property at 6628 Santa Isabel Street, Carlsbad 92009 ("6628 Santa Isabel Street").

1388. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 6628 Santa Isabel Street to Saint Elizabeth Seton RPSC.

1389. Plaintiffs believe and allege that on the date of the transfer of 6628 Santa Isabel Street, as alleged in ¶1388 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6628 Santa Isabel Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1390. Plaintiffs seek to set aside the transfer of 6628 Santa Isabel Street.

1391. Plaintiffs are entitled to recover from the Diocese and Saint Elizabeth Seton RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1392. The Diocese and Saint Elizabeth Seton RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND TWENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1393. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1385-1392 of the Two Hundred And Nineteenth Cause of Action.

1394. Plaintiffs believe that when 6628 Santa Isabel Street was transferred, as alleged in ¶1388 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6628 Santa Isabel Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1395. Plaintiffs seek to set aside the transfer of 6628 Santa Isabel Street.

1396. Plaintiffs are entitled to recover from the Diocese and Saint Elizabeth Seton RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1397. The Diocese and Saint Elizabeth Seton RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

111. ***Transfer of 2844 Luciernaga Street - Against the Diocese and Saint Elizabeth Seton Catholic Parish RPSC***

TWO HUNDRED AND TWENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1398. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1399. Prior to September 1, 2019, the Diocese acquired the real property at 2844

Luciernaga Street, Carlsbad 92009 ("2844 Luciernaga Street").

1400. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 2844 Luciernaga Street to Saint Elizabeth Seton RPSC.

1401. Plaintiffs believe and allege that on the date of the transfer of 2844 Luciernaga Street, as alleged in ¶1400 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2844 Luciernaga Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1402. Plaintiffs seek to set aside the transfer of 2844 Luciernaga Street.

1403. Plaintiffs are entitled to recover from the Diocese and Saint Elizabeth Seton RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1404. The Diocese and Saint Elizabeth Seton RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND TWENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1405. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1398-1404 of the Two Hundred And Twenty-First Cause of Action.

1406. Plaintiffs believe that when 2844 Luciernaga Street was transferred, as alleged in ¶1400 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2844 Luciernaga Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1407. Plaintiffs seek to set aside the transfer of 2844 Luciernaga Street.

1408. Plaintiffs are entitled to recover from the Diocese and Saint Elizabeth Seton RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1409. The Diocese and Saint Elizabeth Seton RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

112. ***Transfer of 525 West Vista Way - Against the Diocese and Saint Francis of Assisi RPSC***

TWO HUNDRED AND TWENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1410. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1411. Plaintiffs are informed and believe and thereupon allege that SAINT FRANCIS OF ASSISI CATHOLIC PARISH IN VISTA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Francis of Assisi RPSC") is a California religious corporation.

1412. Prior to September 1, 2019, the Diocese acquired the real property at 525 West Vista Way, Vista 92083 ("525 West Vista Way").

1413. By Grant Deed recorded December 9, 2019 for no consideration, the Diocese transferred 525 West Vista Way to Saint Francis of Assisi RPSC.

1414. Plaintiffs believe and allege that on the date of the transfer of 525 West Vista Way, as alleged in ¶1413 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 525 West Vista Way was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1415. Plaintiffs seek to set aside the transfer of 525 West Vista Way.

1416. Plaintiffs are entitled to recover from the Diocese and Saint Francis of Assisi RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1417. The Diocese and Saint Francis of Assisi RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND TWENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1418. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1410-1417 of the Two Hundred And Twenty-Third Cause of Action.

1419. Plaintiffs believe that when 525 West Vista Way was transferred, as alleged in ¶1413 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 525 West Vista Way was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1420. Plaintiffs seek to set aside the transfer of 525 West Vista Way.

1421. Plaintiffs are entitled to recover from the Diocese and Saint Francis of Assisi RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1422. The Diocese and Saint Francis of Assisi Mission RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

113. ***Transfer of 11451 Blue Cypress Drive - Against the Diocese and Saint Gregory the Great RPSC***

TWO HUNDRED AND TWENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1423. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1424. Plaintiffs are informed and believe and thereupon allege that SAINT GREGORY THE GREAT CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Gregory the Great RPSC") is a California religious corporation.

1425. Prior to September 1, 2019, the Diocese acquired the real property at 11451 Blue Cypress Drive, San Diego 92131 ("11451 Blue Cypress Drive").

1426. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 11451 Blue Cypress Drive to Saint Gregory the Great RPSC.

1427. Plaintiffs believe and allege that on the date of the transfer of 11451 Blue Cypress Drive, as alleged in ¶1426 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 11451 Blue Cypress Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1428. Plaintiffs seek to set aside the transfer of 11451 Blue Cypress Drive.

1429. Plaintiffs are entitled to recover from the Diocese and Saint Gregory the Great RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1430. The Diocese and Saint Gregory the Great RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND TWENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1431. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 1423-1430 of the Two Hundred And Twenty-Fifth Cause of Action.

1432. Plaintiffs believe that when 11451 Blue Cypress Drive was transferred, as alleged in ¶1426 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 11451 Blue Cypress Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1433. Plaintiffs seek to set aside the transfer of 11451 Blue Cypress Drive.

1434. Plaintiffs are entitled to recover from the Diocese and Saint Gregory the Great RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1435. The Diocese and Saint Gregory the Great RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

114. ***Transfer of 936 Genevieve Street - Against the Diocese and Saint James RPSC***

TWO HUNDRED AND TWENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1436. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1437. Plaintiffs are informed and believe and thereupon allege that SAINT JAMES CATHOLIC PARISH IN SOLANA BEACH, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint James RPSC") is a California religious corporation.

1438. Prior to September 1, 2019, the Diocese acquired the real property at 936 Genevieve Street, Solana Beach 92075 ("936 Genevieve Street").

1439. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese

transferred 936 Genevieve Street to Saint James RPSC.

1440. Plaintiffs believe and allege that on the date of the transfer of 936 Genevieve Street, as alleged in ¶1439 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 936 Genevieve Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1441. Plaintiffs seek to set aside the transfer of 936 Genevieve Street.

1442. Plaintiffs are entitled to recover from the Diocese and Saint James RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1443. The Diocese and Saint James RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND TWENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1444. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1436-1443 of the Two Hundred And Twenty-Seventh Cause of Action.

1445. Plaintiffs believe that when 936 Genevieve Street was transferred, as alleged in ¶1439 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 936 Genevieve Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1446. Plaintiffs seek to set aside the transfer of 936 Genevieve Street.

1447. Plaintiffs are entitled to recover from the Diocese and Saint James RPSC the full

amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1448. The Diocese and Saint James RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

115. ***Transfer of 457 Santa Helena - Against the Diocese and Saint James RPSC***

TWO HUNDRED AND TWENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1449. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1450. Prior to September 1, 2019, the Diocese acquired the real property at 457 Santa Helena, Solana Beach 92075 ("457 Santa Helena").

1451. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 457 Santa Helena to Saint James RPSC.

1452. Plaintiffs believe and allege that on the date of the transfer of 457 Santa Helena, as alleged in ¶1451 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 457 Santa Helena was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1453. Plaintiffs seek to set aside the transfer of 457 Santa Helena.

1454. Plaintiffs are entitled to recover from the Diocese and Saint James RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1455. The Diocese and Saint James RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND THIRTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1456. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1449-1455 of the Two Hundred And Twenty-Ninth Cause of Action.

1457. Plaintiffs believe that when 457 Santa Helena was transferred, as alleged in ¶1451 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 457 Santa Helena was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1458. Plaintiffs seek to set aside the transfer of 457 Santa Helena.

1459. Plaintiffs are entitled to recover from the Diocese and Saint James RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1460. The Diocese and Saint James RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

116. ***Transfer of 8175 Lemon Grove Way - Against the Diocese and Saint John of the Cross RPSC***

TWO HUNDRED AND THIRTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1461. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1462. Plaintiffs are informed and believe and thereupon allege that SAINT JOHN OF THE CROSS CATHOLIC PARISH IN LEMON GROVE, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint John of the Cross RPSC") is a

California religious corporation.

1463. Prior to September 1, 2019, the Diocese acquired the real property at 8175 Lemon Grove Way, Lemon Grove 91945 ("8175 Lemon Grove Way").

1464. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 8175 Lemon Grove Way to Saint John of the Cross RPSC.

1465. Plaintiffs believe and allege that on the date of the transfer of 8175 Lemon Grove Way, as alleged in ¶1464 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 8175 Lemon Grove Way was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1466. Plaintiffs seek to set aside the transfer of 8175 Lemon Grove Way.

1467. Plaintiffs are entitled to recover from the Diocese and Saint John of the Cross RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1468. The Diocese and Saint John of the Cross RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND THIRTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1469. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1461-1468 of the Two Hundred And Thirty-First Cause of Action.

1470. Plaintiffs believe that when 8175 Lemon Grove Way was transferred, as alleged in ¶1464 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 8175 Lemon Grove Way was made without the Diocese receiving reasonably equivalent value and the Diocese was

either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1471. Plaintiffs seek to set aside the transfer of 8175 Lemon Grove Way.

1472. Plaintiffs are entitled to recover from the Diocese and Saint John of the Cross RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1473. The Diocese and Saint John of the Cross RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

117. ***Transfer of 8215 Lemon Grove Way - Against the Diocese and Saint John of the Cross RPSC***

TWO HUNDRED AND THIRTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1474. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1475. Prior to September 1, 2019, the Diocese acquired the real property at 8215 Lemon Grove Way, Lemon Grove 91945 ("8215 75 Lemon Grove Way").

1476. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 8215 Lemon Grove Way to Saint John of the Cross RPSC.

1477. Plaintiffs believe and allege that on the date of the transfer of 8215 Lemon Grove Way, as alleged in ¶1476 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 8215 Lemon Grove Way was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1478. Plaintiffs seek to set aside the transfer of 8215 Lemon Grove Way.

1479. Plaintiffs are entitled to recover from the Diocese and Saint John of the Cross

RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1480. The Diocese and Saint John of the Cross RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND THIRTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1481. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1474-1480 of the Two Hundred And Thirty-Third Cause of Action.

1482. Plaintiffs believe that when 8215 Lemon Grove Way was transferred, as alleged in ¶1476 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 8215 Lemon Grove Way was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1483. Plaintiffs seek to set aside the transfer of 8215 Lemon Grove Way.

1484. Plaintiffs are entitled to recover from the Diocese and Saint John of the Cross RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1485. The Diocese and Saint John of the Cross RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

118. ***Transfer of 3536 Columbus Place - Against the Diocese and Saint John of the Cross RPSC***

TWO HUNDRED AND THIRTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1486. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1487. Prior to September 1, 2019, the Diocese acquired the real property at 3536 Columbus Place, Lemon Grove 91945 ("3536 Columbus Place").

1488. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 3536 Columbus Place to Saint John of the Cross RPSC.

1489. Plaintiffs believe and allege that on the date of the transfer of 3536 Columbus Place, as alleged in ¶1488 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3536 Columbus Place was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1490. Plaintiffs seek to set aside the transfer of 3536 Columbus Place.

1491. Plaintiffs are entitled to recover from the Diocese and Saint John of the Cross RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1492. The Diocese and Saint John of the Cross RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND THIRTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1493. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1486-1492 of the Two Hundred And Thirty-Fifth Cause of Action.

1494. Plaintiffs believe that when 3536 Columbus Place was transferred, as alleged in ¶1488 above, creditors, including Plaintiffs, had outstanding claims against the Diocese,

for which it was indebted, and that the transfer of 3536 Columbus Place was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1495. Plaintiffs seek to set aside the transfer of 3536 Columbus Place.

1496. Plaintiffs are entitled to recover from the Diocese and Saint John of the Cross RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1497. The Diocese and Saint John of the Cross RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

119. ***Transfer of 1001 Encinitas Boulevard - Against the Diocese and Saint John the Evangelist Encinitas RPSC***

TWO HUNDRED AND THIRTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1498. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1499. Plaintiffs are informed and believe and thereupon allege that SAINT JOHN THE EVANGELIST CATHOLIC PARISH ENCINITAS IN ENCINITAS, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint John the Evangelist Encinitas RPSC") is a California religious corporation.

1500. Prior to September 1, 2019, the Diocese acquired the real property at 1001 Encinitas Boulevard, Encinitas 92024 ("1001 Encinitas Boulevard").

1501. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 1001 Encinitas Boulevard to Saint John the Evangelist Encinitas RPSC.

1502. Plaintiffs believe and allege that on the date of the transfer of 1001 Encinitas

Boulevard, as alleged in ¶1501 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1001 Encinitas Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1503. Plaintiffs seek to set aside the transfer of 1001 Encinitas Boulevard.

1504. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1505. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND THIRTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1506. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1498-1505 of the Two Hundred And Thirty-Seventh Cause of Action.

1507. Plaintiffs believe that when 1001 Encinitas Boulevard was transferred, as alleged in ¶1501 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1001 Encinitas Boulevard was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1508. Plaintiffs seek to set aside the transfer of 1001 Encinitas Boulevard.

1509. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1510. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

120. ***Transfer of 1638 Polk Avenue - Against the Diocese and Saint John the Evangelist San Diego RPSC***

TWO HUNDRED AND THIRTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1511. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1512. Prior to September 1, 2019, the Diocese acquired the real property at 1638 Polk Avenue, San Diego 92103 ("1638 Polk Avenue").

1513. Plaintiffs are informed and believe and thereupon allege that SAINT JOHN THE EVANGELIST CATHOLIC PARISH SAN DIEGO IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint John the Evangelist San Diego RPSC") is a California religious corporation.

1514. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1638 Polk Avenue to Saint John the Evangelist San Diego RPSC.

1515. Plaintiffs believe and allege that on the date of the transfer of 1638 Polk Avenue, as alleged in ¶1514 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1638 Polk Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1516. Plaintiffs seek to set aside the transfer of 1638 Polk Avenue.

1517. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1518. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FORTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1519. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1511-1518 of the Two Hundred And Thirty-Ninth Cause of Action.

1520. Plaintiffs believe that when 1638 Polk Avenue was transferred, as alleged in ¶1514 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1638 Polk Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1521. Plaintiffs seek to set aside the transfer of 1638 Polk Avenue.

1522. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1523. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

121. ***Transfer of 4124 Park Boulevard - Against the Diocese and Saint John the Evangelist San Diego RPSC***

TWO HUNDRED AND FORTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1524. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1525. Prior to September 1, 2019, the Diocese acquired the real property at 4124 Park Boulevard, San Diego 92103 ("4124 Park Boulevard").

1526. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4124 Park Boulevard to Saint John the Evangelist San Diego RPSC.

1527. Plaintiffs believe and allege that on the date of the transfer of 4124 Park Boulevard, as alleged in ¶1526 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4124 Park Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1528. Plaintiffs seek to set aside the transfer of 4124 Park Boulevard.

1529. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1530. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FORTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1531. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1524-1530 of the Two Hundred And Forty-First Cause of Action.

1532. Plaintiffs believe that when 4124 Park Boulevard was transferred, as alleged in ¶1526 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1638 Polk Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil

Code §3439.05.

1533. Plaintiffs seek to set aside the transfer of 4124 Park Boulevard.

1534. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1535. The Diocese and Saint John the Evangelist RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

122. ***Transfer of 4065 Normal Street - Against the Diocese and Saint John the Evangelist San Diego RPSC***

TWO HUNDRED AND FORTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1536. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1537. Prior to September 1, 2019, the Diocese acquired the real property at 4065 Normal Street, San Diego 92103 ("4065 Normal Street").

1538. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4065 Normal Street to Saint John the Evangelist San Diego RPSC.

1539. Plaintiffs believe and allege that on the date of the transfer of 4065 Normal Street, as alleged in ¶1538 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4065 Normal Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1540. Plaintiffs seek to set aside the transfer of 4065 Normal Street.

1541. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against

the Diocese in the Underlying Actions, including any judgments awarded or entered.

1542. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FORTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1543. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1536-1542 of the First Cause of Action.

1544. Plaintiffs believe that when 4065 Normal Street was transferred, as alleged in ¶1538 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4065 Normal Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1545. Plaintiffs seek to set aside the transfer of 4065 Normal Street.

1546. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1547. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

123. ***Transfer of 4047 Normal Street - Against the Diocese and Saint John the Evangelist San Diego RPSC***

TWO HUNDRED AND FORTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1548. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1549. Prior to September 1, 2019, the Diocese acquired the real property at 4047 Normal Street, San Diego 92103 ("4047 Normal Street").

1550. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4047 Normal Street to Saint John the Evangelist San Diego RPSC.

1551. Plaintiffs believe and allege that on the date of the transfer of 4047 Normal Street, as alleged in ¶1550 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4047 Normal Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1552. Plaintiffs seek to set aside the transfer of 4047 Normal Street.

1553. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1554. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FORTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1555. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1548-1554 of the Two Hundred And Forty-Fifth Cause of Action.

1556. Plaintiffs believe that when 4047 Normal Street was transferred, as alleged in ¶1550 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4047 Normal Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil

Code §3439.05.

1557. Plaintiffs seek to set aside the transfer of 4047 Normal Street.

1558. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1559. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

124. ***Transfer of 4005 Normal Street - Against the Diocese and Saint John the Evangelist Sam Diego RPSC***

TWO HUNDRED AND FORTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1560. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1561. Prior to September 1, 2019, the Diocese acquired the real property at 4005 Normal Street, San Diego 92103 ("4005 Normal Street").

1562. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4005 Normal Street to Saint John the Evangelist San Diego RPSC.

1563. Plaintiffs believe and allege that on the date of the transfer of 4005 Normal Street, as alleged in ¶1562 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4005 Normal Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1564. Plaintiffs seek to set aside the transfer of 4005 Normal Street.

1565. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against

the Diocese in the Underlying Actions, including any judgments awarded or entered.

1566. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FORTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1567. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1560-1566 of the Two Hundred And Forty-Seventh Cause of Action.

1568. Plaintiffs believe that when 4005 Normal Street was transferred, as alleged in ¶1562 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4005 Normal Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1569. Plaintiffs seek to set aside the transfer of 4005 Normal Street.

1570. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1571. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

125. ***Transfer of 1620 Lincoln Avenue - Against the Diocese and Saint John the Evangelist San Diego RPSC***

TWO HUNDRED AND FORTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1572. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

1573. Prior to September 1, 2019, the Diocese acquired the real property at 1620 Lincoln Avenue, San Diego 92103 ("1620 Lincoln Avenue").

1574. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 1620 Lincoln Avenue to Saint John the Evangelist San Diego RPSC.

1575. Plaintiffs believe and allege that on the date of the transfer of 1620 Lincoln Avenue, as alleged in ¶1574 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1620 Lincoln Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1576. Plaintiffs seek to set aside the transfer of 1620 Lincoln Avenue.

1577. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1578. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FIFTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1579. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1572-1578 of the Two Hundred And Forty-Ninth Cause of Action.

1580. Plaintiffs believe that when 1620 Lincoln Avenue was transferred, as alleged in ¶1574 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1620 Lincoln Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either

insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1581. Plaintiffs seek to set aside the transfer of 1620 Lincoln Avenue.

1582. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1583. The Diocese and Saint John the Evangelist San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

126. ***Transfer of 1567 Third Avenue - Against the Diocese and Saint Joseph Cathedral RPSC***

TWO HUNDRED AND FIFTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1584. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1585. Plaintiffs are informed and believe and thereupon allege that SAINT JOSEPH CATHEDRAL CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Joseph Cathedral RPSC") is a California religious corporation.

1586. Prior to September 1, 2019, the Diocese acquired the real property at 1567 Third Avenue, San Diego 92101 ("1567 Third Avenue").

1587. By Grant Deed recorded December 9th, 2019 for no consideration, the Diocese transferred 1567 Third Avenue to Saint Joseph Cathedral RPSC.

1588. Plaintiffs believe and allege that on the date of the transfer of 1567 Third Avenue, as alleged in ¶1587 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1567 Third Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in

violation of Civil Code §3439.04(a)(1).

1589. Plaintiffs seek to set aside the transfer of 1567 Third Avenue.

1590. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Cathedral RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1591. The Diocese and Saint Joseph Cathedral RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FIFTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1592. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1584-1591 of the Two Hundred And Fifty-First Cause of Action.

1593. Plaintiffs believe that when 1567 Third Avenue was transferred, as alleged in ¶1587 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1567 Third Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1594. Plaintiffs seek to set aside the transfer of 1567 Third Avenue.

1595. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Cathedral RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1596. The Diocese and Saint Joseph Cathedral RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

127. ***Transfer of 1522 Third Avenue - Against the Diocese and Saint Joseph Cathedral RPSC***

TWO HUNDRED AND FIFTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1597. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1598. Prior to September 1, 2019, the Diocese acquired the real property at 1522 Third Avenue, San Diego 92101 ("1522 Third Avenue").

1599. By Grant Deed recorded December 9, 2019 for no consideration, the Diocese transferred 1522 Third Avenue to Saint Joseph Cathedral RPSC.

1600. Plaintiffs believe and allege that on the date of the transfer of 1522 Third Avenue, as alleged in ¶1599 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1522 Third Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1601. Plaintiffs seek to set aside the transfer of 1522 Third Avenue.

1602. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Cathedral RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1603. The Diocese and Saint Joseph Cathedral RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FIFTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1604. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1597-1603 of the Two Hundred And Fifty Third Cause of Action.

1605. Plaintiffs believe that when 1522 Third Avenue was transferred, as alleged in

¶1599 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1522 Third Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1606. Plaintiffs seek to set aside the transfer of 1522 Third Avenue.

1607. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Cathedral RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1608. The Diocese and Saint Joseph Cathedral RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

128. ***Transfer of 215 North Center Street - Against the Diocese and Saint Joseph Westmorland RPSC***

TWO HUNDRED AND FIFTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1609. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1610. Plaintiffs are informed and believe and thereupon allege that SAINT JOSEPH CATHOLIC PARISH WESTMORLAND IN WESTMORLAND, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Joseph Westmorland RPSC") is a California religious corporation.

1611. Prior to September 1, 2019, the Diocese acquired the real property at 215 North Center Street Westmorland 92281 ("215 North Center Street")

1612. By Grant Deed recorded September 26, 2019 for no consideration, the Diocese transferred 215 North Center Street to Saint Joseph Westmorland RPSC.

1613. Plaintiffs believe and allege that on the date of the transfer of 215 North Center Street, as alleged in ¶1612 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 215 North Center Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1614. Plaintiffs seek to set aside the transfer of 215 North Center Street.

1615. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Westmorland RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1616. The Diocese and Saint Joseph Westmorland RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FIFTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1617. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1609-1616 of the Two Hundred And Fifty-Fifth Cause of Action.

1618. Plaintiffs believe that when 215 North Center Street was transferred, as alleged in ¶1612 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 215 North Center Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1619. Plaintiffs seek to set aside the transfer of 215 North Center Street.

1620. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Westmorland RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese

in the Underlying Actions, including any judgments awarded or entered.

1621. The Diocese and Saint Joseph Westmorland RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

129. ***Transfer of 300 North Center Street - Against the Diocese and Saint Joseph Westmorland RPSC***

TWO HUNDRED AND FIFTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1622. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1623. Prior to September 1, 2019, the Diocese acquired the real property at 300 North Center Street Westmorland 92281 ("300 North Center Street")

1624. By Grant Deed recorded December 13, 2019 for no consideration, the Diocese transferred 300 North Center Street to Saint Joseph Westmorland RPSC.

1625. Plaintiffs believe and allege that on the date of the transfer of 300 North Center Street, as alleged in ¶1624 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 300 North Center Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1626. Plaintiffs seek to set aside the transfer of 300 North Center Street.

1627. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Westmorland RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1628. The Diocese and Saint Joseph Westmorland RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND FIFTY-EIGTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1629. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1622-1628 of the Two Hundred And Fifty-Seventh Cause of Action.

1630. Plaintiffs believe that when 300 North Center Street was transferred, as alleged in ¶1624 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 300 North Center Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1631. Plaintiffs seek to set aside the transfer of 300 North Center Street.

1632. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Westmorland RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1633. The Diocese and Saint Joseph Westmorland RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

130. Transfer of 3790 Boston Avenue - Against the Diocese and Saint Jude Shrine of the West RPSC

TWO HUNDRED AND FIFTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1634. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1635. Plaintiffs are informed and believe and thereupon allege that SAINT JUDE SHRINE OF THE WEST CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Jude Shrine of the West RPSC") is a California religious corporation.

1636. Prior to September 1, 2019, the Diocese acquired the real property at 3790 Boston Avenue, San Diego 92113 ("3790 Boston Avenue")

1637. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 3790 Boston Avenue to Saint Jude Shrine of the West RPSC.

1638. Plaintiffs believe and allege that on the date of the transfer of 3790 Boston Avenue, as alleged in ¶1637 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3790 Boston Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1639. Plaintiffs seek to set aside the transfer of 3790 Boston Avenue.

1640. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1641. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SIXTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1642. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1634-1641 of the Two Hundred And Fifty-Ninth Cause of Action.

1643. Plaintiffs believe that when 3790 Boston Avenue was transferred, as alleged in ¶1637 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3790 Boston Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil

Code §3439.05.

1644. Plaintiffs seek to set aside the transfer of 3790 Boston Avenue.

1645. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1646. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

131. Transfer of 3751 Boston Avenue - Against the Diocese and Saint Jude Shrine of the West RPSC

TWO HUNDRED AND SIXTY THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1647. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1648. Prior to September 1, 2019, the Diocese acquired the real property at 3751 Boston Avenue, San Diego 92113 ("3751 Boston Avenue")

1649. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 3751 Boston Avenue to Saint Jude Shrine of the West RPSC.

1650. Plaintiffs believe and allege that on the date of the transfer of 3751 Boston Avenue, as alleged in ¶1649 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3751 Boston Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1651. Plaintiffs seek to set aside the transfer of 3751 Boston Avenue.

1652. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1653. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SIXTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1654. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1647-1653 of the Two Hundred And Sixty-First Cause of Action.

1655. Plaintiffs believe that when 3751 Boston Avenue was transferred, as alleged in ¶1649 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3751 Boston Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1656. Plaintiffs seek to set aside the transfer of 3751 Boston Avenue.

1657. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1658. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

132. Transfer of 1205 South 38th Street - Against the Diocese and Saint Jude Shrine of the West RPSC

TWO HUNDRED AND SIXTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1659. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1660. Prior to September 1, 2019, the Diocese acquired the real property at 1205 South

38th Street, San Diego 92113 ("1205 South 38th Street")

1661. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 1205 South 38th Street to Saint Jude Shrine of the West RPSC.

1662. Plaintiffs believe and allege that on the date of the transfer of 1205 South 38th Street, as alleged in ¶1661 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1205 South 38th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1663. Plaintiffs seek to set aside the transfer of 1205 South 38th Street.

1664. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1665. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SIXTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1666. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1659-1665 of the Two Hundred And Sixty-Third Cause of Action.

1667. Plaintiffs believe that when 1205 South 38th Street was transferred, as alleged in ¶1661 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1205 South 38th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1668. Plaintiffs seek to set aside the transfer of 1205 South 38th Street.

1669. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1670. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

133. Transfer of 1127 South 38th Street - Against the Diocese and Saint Jude Shrine of the West RPSC

TWO HUNDRED AND SIXTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1671. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1672. Prior to September 1, 2019, the Diocese acquired the real property at 1127 South 38th Street, San Diego 92113 ("1127 South 38th Street")

1673. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 1127 South 38th Street to Saint Jude Shrine of the West RPSC.

1674. Plaintiffs believe and allege that on the date of the transfer of 1127 South 38th Street, as alleged in ¶1673 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1127 South 38th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1675. Plaintiffs seek to set aside the transfer of 1127 South 38th Street.

1676. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1677. The Diocese and Saint Jude Shrine of the West RPSC did the things herein

alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SIXTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1678. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1671-1677 of the Two Hundred And Sixty-Fifth Cause of Action.

1679. Plaintiffs believe that when 1127 South 38th Street was transferred, as alleged in ¶1673 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1127 South 38th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1680. Plaintiffs seek to set aside the transfer of 1127 South 38th Street.

1681. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1682. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

134. Transfer of 1228 South 38th Street - Against the Diocese and Saint Jude Shrine of the West RPSC

TWO HUNDRED AND SIXTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1683. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1684. Prior to September 1, 2019, the Diocese acquired the real property at 1228 South 38th Street, San Diego 92113 ("1228 South 38th Street")

1685. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 1228 South 38th Street to Saint Jude Shrine of the West RPSC.

1686. Plaintiffs believe and allege that on the date of the transfer of 1228 South 38th Street, as alleged in ¶1685 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1228 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1687. Plaintiffs seek to set aside the transfer of 1228 South 38th Street.

1688. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1689. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SIXTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1690. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1683-1689 of the Two Hundred And Sixty-Seventh Cause of Action.

1691. Plaintiffs believe that when 1228 South 38th Street was transferred, as alleged in ¶1685 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1228 South 38th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1692. Plaintiffs seek to set aside the transfer of 1228 South 38th Street.

1693. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1694. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

135. Transfer of 3784 Boston Avenue - Against the Diocese and Saint Jude Shrine of the West RPSC

TWO HUNDRED AND SIXTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1695. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1696. Prior to September 1, 2019, the Diocese acquired the real property at 3784 Boston Avenue, San Diego 92113 ("3784 Boston Avenue")

1697. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 3784 Boston Avenue to Saint Jude Shrine of the West RPSC.

1698. Plaintiffs believe and allege that on the date of the transfer of 3784 Boston Avenue, as alleged in ¶1697 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3784 Boston Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1699. Plaintiffs seek to set aside the transfer of 3784 Boston Avenue.

1700. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1701. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SEVENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1702. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1695-1701 of the Two Hundred And Sixty-Ninth Cause of Action.

1703. Plaintiffs believe that when 3784 Boston Avenue was transferred, as alleged in ¶1697 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3784 Boston Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1704. Plaintiffs seek to set aside the transfer of 3784 Boston Avenue.

1705. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1706. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

136. Transfer of 1520 Greenfield Drive - Against the Diocese and Saint Kieran RPSC

TWO HUNDRED AND SEVENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1707. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1708. Plaintiffs are informed and believe and thereupon allege that SAINT KIERAN CATHOLIC PARISH IN EL CAJON, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Kieran RPSC") is a California religious corporation.

1709. Prior to September 1, 2019, the Diocese acquired the real property at 1520 Greenfield Drive, El Cajon 92021 ("1520 Greenfield Drive")

1710. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1520 Greenfield Drive to Saint Kieran RPSC.

1711. Plaintiffs believe and allege that on the date of the transfer of 1520 Greenfield Drive, as alleged in ¶1710 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1520 Greenfield Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1712. Plaintiffs seek to set aside the transfer of 1520 Greenfield Drive.

1713. Plaintiffs are entitled to recover from the Diocese and Saint Kieran RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1714. The Diocese and Saint Kieran RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ONE TWO HUNDRED AND SEVENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1715. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1707-1714 of the Two Hundred And Seventy-First Cause of Action.

1716. Plaintiffs believe that when 1520 Greenfield Drive was transferred, as alleged in ¶1710 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1520 Greenfield Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in

violation of Civil Code §3439.05.

1717. Plaintiffs seek to set aside the transfer of 1520 Greenfield Drive.

1718. Plaintiffs are entitled to recover from the Diocese and Saint Kieran RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1719. The Diocese and Saint Kieran RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

137. Transfer of 1512 Greenfield Drive - Against the Diocese and Saint Kieran RPSC

TWO HUNDRED AND SEVENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1720. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1721. Prior to September 1, 2019, the Diocese acquired the real property at 1512 Greenfield Drive, El Cajon 92021 ("1512 Greenfield Drive")

1722. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 1512 Greenfield Drive to Saint Kieran RPSC.

1723. Plaintiffs believe and allege that on the date of the transfer of 1512 Greenfield Drive, as alleged in ¶1722 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1512 Greenfield Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1724. Plaintiffs seek to set aside the transfer of 1512 Greenfield Drive.

1725. Plaintiffs are entitled to recover from the Diocese and Saint Kieran RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1726. The Diocese and Saint Kieran RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

ON TWO HUNDRED AND SEVENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1727. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1720-1726 of the Two Hundred And Seventy-Third Cause of Action.

1728. Plaintiffs believe that when 1512 Greenfield Drive was transferred, as alleged in ¶1722 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1512 Greenfield Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1729. Plaintiffs seek to set aside the transfer of 1512 Greenfield Drive.

1730. Plaintiffs are entitled to recover from the Diocese and Saint Kieran RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1731. The Diocese and Saint Kieran RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

138. Transfer of 2005 Crest Drive - Against the Diocese and Saint Louise De Marillac RPSC

TWO HUNDRED AND SEVENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1732. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1733. Plaintiffs are informed and believe and thereupon allege that SAINT LOUISE DE

MARILLAC CATHOLIC PARISH IN EL CAJON, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Louise De Marillac RPSC") is a California religious corporation.

1734. Prior to September 1, 2019 the Diocese acquired the real property at 2005 Crest Drive, El Cajon 92021 ("2005 Crest Drive")

1735. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 2005 Crest Drive to Saint Louise De Marillac RPSC.

1736. Plaintiffs believe and allege that on the date of the transfer of 2005 Crest Drive, as alleged in ¶1735 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2005 Crest Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1737. Plaintiffs seek to set aside the transfer of 2005 Crest Drive.

1738. Plaintiffs are entitled to recover from the Diocese and Saint Louise De Marillac RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1739. The Diocese and Saint Louise De Marillac RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SEVENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1740. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1732-1739 of the Two Hundred And Seventy-Fifth Cause of Action.

1741. Plaintiffs believe that when 2005 Crest Drive was transferred, as alleged in ¶1735 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for

which it was indebted, and that the transfer of 2005 Crest Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1742. Plaintiffs seek to set aside the transfer of 2005 Crest Drive.

1743. Plaintiffs are entitled to recover from the Diocese and Saint Louise De Marillac RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1744. The Diocese and Saint Louise De Marillac RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

139. Transfer of 1980 Hillsdale Road - Against the Diocese and Saint Luke RPSC

TWO HUNDRED AND SEVENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1745. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1746. Plaintiffs are informed and believe and thereupon allege that THE CHURCH OF SAINT LUKE CATHOLIC PARISH IN EL CAJON, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Luke RPSC") is a California religious corporation.

1747. Prior to September 1, 2019, the Diocese acquired the real property at 1980 Hillsdale Road, El Cajon 92019 ("1980 Hillsdale Road")

1748. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 1980 Hillsdale Road to Saint Luke RPSC.

1749. Plaintiffs believe and allege that on the date of the transfer of 1980 Hillsdale Road, as alleged in ¶1748 above, creditors, including Plaintiffs, had outstanding claims

against the Diocese, for which it was indebted, and that the transfer of 1980 Hillsdale Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1750. Plaintiffs seek to set aside the transfer of 1980 Hillsdale Road.

1751. Plaintiffs are entitled to recover from the Diocese and Saint Luke RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1752. The Diocese and Saint Luke RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND SEVENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1753. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1745-1752 of the Two Hundred And Seventy-Seventh Cause of Action.

1754. Plaintiffs believe that when 1980 Hillsdale Road was transferred, as alleged in ¶1748 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1980 Hillsdale Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1755. Plaintiffs seek to set aside the transfer of 1980 Hillsdale Road.

1756. Plaintiffs are entitled to recover from the Diocese and Saint Luke RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1757. The Diocese and Saint Luke RPSC did the things herein alleged maliciously and

to oppress the Diocese's creditors.

140. Transfer of 1245 Bitterbush Lane - Against the Diocese and Saint Luke RPSC

TWO HUNDRED AND SEVENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1758. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1759. Prior to September 1, 2019, the Diocese acquired the real property at 1245 Bitterbush Lane, El Cajon 92019 ("1245 Bitterbush Lane")

1760. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 1245 Bitterbush Lane to Saint Luke RPSC.

1761. Plaintiffs believe and allege that on the date of the transfer of 1245 Bitterbush Lane, as alleged in ¶1760 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1245 Bitterbush Lane was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1762. Plaintiffs seek to set aside the transfer of 1245 Bitterbush Lane.

1763. Plaintiffs are entitled to recover from the Diocese and Saint Luke RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1764. The Diocese and Saint Luke RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND EIGHTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1765. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1758-1764 of the Two Hundred And Seventy-Ninth Cause

of Action.

1766. Plaintiffs believe that when 1245 Bitterbush Lane was transferred, as alleged in ¶1760 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1245 Bitterbush Lane was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1767. Plaintiffs seek to set aside the transfer of 1245 Bitterbush Lane.

1768. Plaintiffs are entitled to recover from the Diocese and Saint Luke RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1769. The Diocese and Saint Luke RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

141. Transfer of 620 South Cesar Chavez Street - Against the Diocese and Saint Margaret Mary RPSC

TWO HUNDRED AND EIGHTY FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1770. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1771. Plaintiffs are informed and believe and thereupon allege that SAINT MARGARET MARY CATHOLIC PARISH IN BRAWLEY, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Margaret Mary RPSC") is a California religious corporation.

1772. Prior to September 1, 2019, the Diocese acquired the real property at 620 South Cesar Chavez Street, Brawley 92227 ("620 South Cesar Chavez Street")

1773. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese

transferred 620 South Cesar Chavez Street to Saint Margaret Mary RPSC.

1774. Plaintiffs believe and allege that on the date of the transfer of 620 South Cesar Chavez Street, as alleged in ¶1773 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 620 South Cesar Chavez Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1775. Plaintiffs seek to set aside the transfer of 620 South Cesar Chavez Street.

1776. Plaintiffs are entitled to recover from the Diocese and Saint Margaret Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1777. The Diocese and Saint Margaret Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND EIGHTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1778. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1770-1777 of the Two Hundred And Eighty-First Cause of Action.

1779. Plaintiffs believe that when 620 South Cesar Chavez Street was transferred, as alleged in ¶1773 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 620 South Cesar Chavez Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1780. Plaintiffs seek to set aside the transfer of 620 South Cesar Chavez Street.

1781. Plaintiffs are entitled to recover from the Diocese and Saint Margaret Mary RPSC

the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1782. The Diocese and Saint Margaret Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

142. Transfer of 1000 K Street - Against the Diocese and Saint Margaret Mary RPSC

TWO HUNDRED AND EIGHTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1783. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1784. Prior to September 1, 2019, the Diocese acquired the real property at 1000 K Street, Brawley 92227 ("1000 K Street")

1785. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese transferred 1000 K Street to Saint Margaret Mary RPSC.

1786. Plaintiffs believe and allege that on the date of the transfer of 1000 K Street, as alleged in ¶1785 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1000 K Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1787. Plaintiffs seek to set aside the transfer of 1000 K Street.

1788. Plaintiffs are entitled to recover from the Diocese and Saint Margaret Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1789. The Diocese and Saint Margaret Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND EIGHTY-FOURTH SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1790. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1783-1789 of the Two Hundred And Eighty-Third Cause of Action.

1791. Plaintiffs believe that when 1000 K Street was transferred, as alleged in ¶1785 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1000 K Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1792. Plaintiffs seek to set aside the transfer of 1000 K Street.

1793. Plaintiffs are entitled to recover from the Diocese and Saint Margaret Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1794. The Diocese and Saint Margaret Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

143. Transfer of 1024 K Street - Against the Diocese and Saint Margaret Mary RPSC

TWO HUNDRED AND EIGHTY FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1795. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1796. Prior to September 1, 2019, the Diocese acquired the real property at 1024 K Street, Brawley 92227 ("1024 K Street")

1797. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese transferred 1024 K Street to Saint Margaret Mary RPSC.

1798. Plaintiffs believe and allege that on the date of the transfer of 1024 K Street, as alleged in ¶1797 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1024 K Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1799. Plaintiffs seek to set aside the transfer of 1024 K Street.

1800. Plaintiffs are entitled to recover from the Diocese and Saint Margaret Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1801. The Diocese and Saint Margaret Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND EIGHTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1802. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1795-1801 of the Two Hundred And Eighty-Fifth Cause of Action.

1803. Plaintiffs believe that when 1024 K Street was transferred, as alleged in ¶1797 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1024 K Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1804. Plaintiffs seek to set aside the transfer of 1024 K Street.

1805. Plaintiffs are entitled to recover from the Diocese and Saint Margaret Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

1806. The Diocese and Saint Margaret Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

144. Transfer of 1058 Leonard Street - Against the Diocese and Saint Margaret Mary RPSC

TWO HUNDRED AND EIGHTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1807. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1808. Prior to September 1, 2019, the Diocese acquired the real property at 1058 Leonard Street, Brawley 92227 ("1058 Leonard Street")

1809. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese transferred 1058 Leonard Street to Saint Margaret Mary RPSC.

1810. Plaintiffs believe and allege that on the date of the transfer of 1058 Leonard Street, as alleged in ¶1809 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1058 Leonard Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1811. Plaintiffs seek to set aside the transfer of 1058 Leonard Street.

1812. Plaintiffs are entitled to recover from the Diocese and Saint Margaret Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1813. The Diocese and Saint Margaret Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND EIGHTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1814. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1807-1813 of the Two Hundred And Eighty-Seventh Cause of Action.

1815. Plaintiffs believe that when 1058 Leonard Street was transferred, as alleged in ¶1809 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1058 Leonard Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1816. Plaintiffs seek to set aside the transfer of 1058 Leonard Street.

1817. Plaintiffs are entitled to recover from the Diocese and Saint Margaret Mary RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1818. The Diocese and Saint Margaret Mary RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

145. Transfer of 4300 Oceanside Boulevard - Against the Diocese and Saint Margaret RPSC

TWO HUNDRED AND EIGHTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1819. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1820. Plaintiffs are informed and believe and thereupon allege that SAINT MARGARET CATHOLIC PARISH IN OCEANSIDE, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Margaret RPSC") is a California religious corporation.

1821. Prior to September 1, 2019, the Diocese acquired the real property at 4300

Oceanside Boulevard, Oceanside 92056 ("4300 Oceanside Boulevard")

1822. By Grant Deed recorded September 25, 2019 for no consideration, the Diocese transferred 4300 Oceanside Boulevard to Saint Margaret RPSC.

1823. Plaintiffs believe and allege that on the date of the transfer of 4300 Oceanside Boulevard, as alleged in ¶1822 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4300 Oceanside Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1824. Plaintiffs seek to set aside the transfer of 4300 Oceanside Boulevard.

1825. Plaintiffs are entitled to recover from the Diocese and Saint Margaret RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1826. The Diocese and Saint Margaret RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND NINETIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1827. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1819-1826 of the Two Hundred And Eighty-Ninth Cause of Action.

1828. Plaintiffs believe that when 4300 Oceanside Boulevard was transferred, as alleged in ¶1822 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4300 Oceanside Boulevard was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1829. Plaintiffs seek to set aside the transfer of 4300 Oceanside Boulevard.

1830. Plaintiffs are entitled to recover from the Diocese and Saint Margaret RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1831. The Diocese and Saint Margaret RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

146. Transfer of 1866 Blackhawk Avenue - Against the Diocese and Saint Margaret RPSC

TWO HUNDRED AND NINETY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1832. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1833. Prior to September 1, 2019, the Diocese acquired the real property at 1866 Blackhawk Avenue, Oceanside 92056 ("1866 Blackhawk Avenue")

1834. By Grant Deed recorded September 25, 2019 for no consideration, the Diocese transferred 1866 Blackhawk Avenue to Saint Margaret RPSC.

1835. Plaintiffs believe and allege that on the date of the transfer of 1866 Blackhawk Avenue, as alleged in ¶1834 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1866 Blackhawk Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1836. Plaintiffs seek to set aside the transfer of 1866 Blackhawk Avenue.

1837. Plaintiffs are entitled to recover from the Diocese and Saint Margaret RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1838. The Diocese and Saint Margaret RPSC did the things herein alleged maliciously

and to oppress the Diocese's creditors.

TWO HUNDRED AND NINETY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1839. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1832-1838 of the Two Hundred And Ninety-First Cause of Action.

1840. Plaintiffs believe that when 1866 Blackhawk Avenue was transferred, as alleged in ¶1834 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1866 Blackhawk Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1841. Plaintiffs seek to set aside the transfer of 1866 Blackhawk Avenue.

1842. Plaintiffs are entitled to recover from the Diocese and Saint Margaret RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1843. The Diocese and Saint Margaret RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

147. Transfer of 1147 Discovery Street - Against the Diocese and Saint Mark RPSC

TWO HUNDRED AND NINETY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1844. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1845. Plaintiffs are informed and believe and thereupon allege that SAINT MARK CATHOLIC PARISH IN SAN MARCOS, CALIFORNIA REAL PROPERTY

SUPPORT CORPORATION ("Saint Mark RPSC") is a California religious corporation.

1846. Prior to September 1, 2019, the Diocese acquired the real property at 1147 Discovery Street, San Marcos 92078 ("1147 Discovery Street")

1847. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 1147 Discovery Street to Saint Mark RPSC.

1848. Plaintiffs believe and allege that on the date of the transfer of 1147 Discovery Street, as alleged in ¶1847 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1147 Discovery Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1849. Plaintiffs seek to set aside the transfer of 1147 Discovery Street.

1850. Plaintiffs are entitled to recover from the Diocese and Saint Mark RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1851. The Diocese and Saint Mark RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND NINETY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1852. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1844-1851 of the Two Hundred And Ninety-Third Cause of Action.

1853. Plaintiffs believe that when 1147 Discovery Street was transferred, as alleged in ¶1847 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1147 Discovery Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either

insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1854. Plaintiffs seek to set aside the transfer of 1147 Discovery Street.

1855. Plaintiffs are entitled to recover from the Diocese and Saint Mark RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1856. The Diocese and Saint Mark RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

148. Transfer of 2557 Sarver Lane - Against the Diocese and Saint Mark RPSC

TWO HUNDRED AND NINETY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1857. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1858. Prior to September 1, 2019, the Diocese acquired the real property at 2557 Sarver Lane, San Marcos 92069 ("2557 Sarver Lane")

1859. By Grant Deed recorded January 17, 2020 for no consideration, the Diocese transferred 2557 Sarver Lane to Saint Mark RPSC.

1860. Plaintiffs believe and allege that on the date of the transfer of 2557 Sarver Lane, as alleged in ¶1859 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2557 Sarver Lane was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1861. Plaintiffs seek to set aside the transfer of 2557 Sarver Lane.

1862. Plaintiffs are entitled to recover from the Diocese and Saint Mark RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

1863. The Diocese and Saint Mark RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND NINETY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1864. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1857-1863 of the Two Hundred And Ninety Fifth Cause of Action.

1865. Plaintiffs believe that when 2557 Sarver Lane was transferred, as alleged in ¶1859 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2557 Sarver Lane was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1866. Plaintiffs seek to set aside the transfer of 2557 Sarver Lane.

1867. Plaintiffs are entitled to recover from the Diocese and Saint Mark RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1868. The Diocese and Saint Mark RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

149. Transfer of 568 Deer Springs Road - Against the Diocese and Saint Mark RPSC

TWO HUNDRED AND NINETY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1869. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1870. Prior to September 1, 2019, the Diocese acquired the real property at 568 Deer Springs Road, San Marcos 92069 ("568 Deer Springs Road")

1871. By Grant Deed recorded December 10, 2019, for no consideration, the Diocese transferred 568 Deer Springs Road to Saint Mark RPSC.

1872. Plaintiffs believe and allege that on the date of the transfer of 568 Deer Springs Road, as alleged in ¶1871 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 568 Deer Springs Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1873. Plaintiffs seek to set aside the transfer of 568 Deer Springs Road.

1874. Plaintiffs are entitled to recover from the Diocese and Saint Mark RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1875. The Diocese and Saint Mark RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

TWO HUNDRED AND NINETY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1876. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1869-1875 of the Two Hundred And Ninety-Seventh Cause of Action.

1877. Plaintiffs believe that when 568 Deer Springs Road was transferred, as alleged in ¶1871 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 568 Deer Springs Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in

violation of Civil Code §3439.05.

1878. Plaintiffs seek to set aside the transfer of 568 Deer Springs Road.

1879. Plaintiffs are entitled to recover from the Diocese and Saint Mark RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1880. The Diocese and Saint Mark RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

150. Transfer of 7710 El Cajon Boulevard (APN Number 470-100-18-00) - Against the Diocese and Saint Martin of Tours RPSC

TWO HUNDRED AND NINETY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1881. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1882. Plaintiffs are informed and believe and thereupon allege that SAINT MARTIN OF TOURS CATHOLIC PARISH IN LA MESA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Martin of Tours RPSC") is a California religious corporation.

1883. Prior to September 1, 2019, the Diocese acquired the real property at 7710 El Cajon Boulevard, La Mesa 91942 ("7710 El Cajon Boulevard APN 470-100-18-00")

1884. By Grant Deed recorded September 16, 2019, for no consideration, the Diocese transferred 7710 El Cajon Boulevard APN 470-100-18-00 to Saint Martin of Tours RPSC.

1885. Plaintiffs believe and allege that on the date of the transfer of 7710 El Cajon Boulevard APN 470-100-18-00, as alleged in ¶1884 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the

transfer of 7710 El Cajon Boulevard APN 470-100-18-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1886. Plaintiffs seek to set aside the transfer of 7710 El Cajon Boulevard APN 470-100-18-00.

1887. Plaintiffs are entitled to recover from the Diocese and Saint Martin of Tours RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1888. The Diocese and Saint Martin of Tours RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDREDTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1889. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1881-1888 of the Two Hundred And Ninety-Ninth Cause of Action.

1890. Plaintiffs believe that when 7710 El Cajon Boulevard APN 470-100-18-00 was transferred, as alleged in ¶1884 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7710 El Cajon Boulevard APN 470-100-18-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1891. Plaintiffs seek to set aside the transfer of 7710 El Cajon Boulevard APN 470-100-18-00.

1892. Plaintiffs are entitled to recover from the Diocese and Saint Martin of Tours

RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1893. The Diocese and Saint Martin of Tours RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

151. Transfer of 7710 El Cajon Boulevard (APN Number 470-100-17-00) - Against the Diocese and Saint Martin of Tours RPSC

THREE HUNDRED AND FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1894. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1895. Prior to September 1, 2019, the Diocese acquired the real property at 7710 El Cajon Boulevard, La Mesa 91942 ("7710 El Cajon Boulevard APN 470-100-17-00")

1896. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 7710 El Cajon Boulevard to Saint Martin of Tours RPSC.

1897. Plaintiffs believe and allege that on the date of the transfer of 7710 El Cajon Boulevard APN 470-100-17-00, as alleged in ¶1896 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7710 El Cajon Boulevard APN 470-100-17-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1898. Plaintiffs seek to set aside the transfer of 7710 El Cajon Boulevard APN 470-100-17-00.

1899. Plaintiffs are entitled to recover from the Diocese and Saint Martin of Tours RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1900. The Diocese and Saint Martin of Tours RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1901. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1894-1900 of the Three Hundred And First Cause of Action.

1902. Plaintiffs believe that when 7710 El Cajon Boulevard APN 470-100-17-00 was transferred, as alleged in ¶1896 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7710 El Cajon Boulevard APN 470-100-17-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1903. Plaintiffs seek to set aside the transfer of 7710 El Cajon Boulevard APN 470-100-17-00.

1904. Plaintiffs are entitled to recover from the Diocese and Saint Martin of Tours RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1905. The Diocese and Saint Martin of Tours RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

152. Transfer of 7712 El Cajon Boulevard - Against the Diocese and Saint Martin of Tours RPSC

THREE HUNDRED AND THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1906. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1907. Prior to September 1, 2019, the Diocese acquired the real property at 7712 El

Cajon Boulevard, La Mesa 91942 ("7712 El Cajon Boulevard")

1908. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 7712 El Cajon Boulevard to Saint Martin of Tours RPSC.

1909. Plaintiffs believe and allege that on the date of the transfer of 7712 El Cajon Boulevard, as alleged in ¶1908 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7712El Cajon Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1910. Plaintiffs seek to set aside the transfer of 7712 El Cajon Boulevard.

1911. Plaintiffs are entitled to recover from the Diocese and Saint Martin of Tours RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1912. The Diocese and Saint Martin of Tours RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1913. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1906-1912 of the Three Hundred And Third Cause of Action.

1914. Plaintiffs believe that when 7712 El Cajon Boulevard was transferred, as alleged in ¶1908 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 7712 El Cajon Boulevard was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1915. Plaintiffs seek to set aside the transfer of 7712 El Cajon Boulevard.

1916. Plaintiffs are entitled to recover from the Diocese and Saint Martin of Tours RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1917. The Diocese and Saint Martin of Tours RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

153. Transfer of 1945 Illion Street - Against the Diocese and Saint Mary Magdalene RPSC

THREE HUNDRED AND FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1918. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1919. Plaintiffs are informed and believe and thereupon allege that SAINT MARY MAGDALENE CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Mary Magdalene RPSC") is a California religious corporation.

1920. Prior to September 1, 2019, the Diocese acquired the real property at 1945 Illion Street, San Diego 92110 ("1945 Illion Street")

1921. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 1945 Illion Street to Saint Mary Magdalene RPSC.

1922. Plaintiffs believe and allege that on the date of the transfer of 1945 Illion Street, as alleged in ¶1921 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1945 Illion Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1923. Plaintiffs seek to set aside the transfer of 1945 Illion Street.

1924. Plaintiffs are entitled to recover from the Diocese and Saint Mary Magdalene RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1925. The Diocese and Saint Mary Magdalene RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1926. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1918-1925 of the Three Hundred And Fifth Cause of Action.

1927. Plaintiffs believe that when 1945 Illion Street was transferred, as alleged in ¶1921 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1945 Illion Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1928. Plaintiffs seek to set aside the transfer of 1945 Illion Street.

1929. Plaintiffs are entitled to recover from the Diocese and Saint Mary Magdalene RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1930. The Diocese and Saint Mary Magdalene RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

154. Transfer of 1940 Illion Street - Against the Diocese and Saint Mary Magdalene RPSC

THREE HUNDRED AND SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1931. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

1932. Prior to September 1, 2019, the Diocese acquired the real property at 1940 Illion Street, San Diego 92110 ("1940 Illion Street")

1933. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 1940 Illion Street to Saint Mary Magdalene RPSC.

1934. Plaintiffs believe and allege that on the date of the transfer of 1940 Illion Street, as alleged in ¶1933 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1940 Illion Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1935. Plaintiffs seek to set aside the transfer of 1940 Illion Street.

1936. Plaintiffs are entitled to recover from the Diocese and Saint Mary Magdalene RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1937. The Diocese and Saint Mary Magdalene RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1938. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1931-1937 of the Three Hundred And Seventh Cause of Action.

1939. Plaintiffs believe that when 1940 Illion Street was transferred, as alleged in ¶1933 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1940 Illion Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the

time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1940. Plaintiffs seek to set aside the transfer of 1940 Illion Street.

1941. Plaintiffs are entitled to recover from the Diocese and Saint Mary Magdalene RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1942. The Diocese and Saint Mary Magdalene RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

155. Transfer of 210 E 13th Avenue (APN Number 233-591-21-00) - Against the Diocese and Saint Mary Escondido RPSC

THREE HUNDRED AND NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1943. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1944. Plaintiffs are informed and believe and thereupon allege that SAINT MARY CATHOLIC PARISH ESCONDIDO IN ESCONDIDO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Mary Escondido RPSC") is a California religious corporation.

1945. Prior to September 1, 2019, the Diocese acquired the real property at 210 E 13th Avenue, Escondido 92025 ("210 E 13th Avenue APN 233-591-21-00").

1946. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 210 E 13th Avenue APN 233-591-21-00 to Saint Mary Escondido RPSC.

1947. Plaintiffs believe and allege that on the date of the transfer of 210 E 13th Avenue, as alleged in ¶1946 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 210 E 13th Avenue APN 233-591-21-00 was made with the actual intent to hinder, delay, or defraud the creditors

of the Diocese in violation of Civil Code §3439.04(a)(1).

1948. Plaintiffs seek to set aside the transfer of 210 E 13th Avenue APN 233-591-21-00.

1949. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1950. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND TENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1951. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1943-1950 of the Three Hundred And Ninth Cause of Action.

1952. Plaintiffs believe that when 210 E 13th Avenue APN 233-591-21-00 was transferred, as alleged in ¶1946 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 210 E 13th Avenue APN 233-591-21-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1953. Plaintiffs seek to set aside the transfer of 210 E 13th Avenue APN 233-591-21-00.

1954. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1955. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

156. Transfer of 210 E 13th Avenue (APN Number 233-591-24-00) - Against the Diocese and Saint Mary Escondido RPSC

THREE HUNDRED AND ELEVENTH CAUSE OF ACTION
[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1956. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1957. Prior to September 1, 2019, the Diocese acquired the real property at 210 E 13th Avenue, Escondido 92025 ("210 E 13th Avenue APN 233-591-24-00").

1958. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 210 E 13th Avenue APN 233-591-24-00 to Saint Mary Escondido RPSC.

1959. Plaintiffs believe and allege that on the date of the transfer of 210 E 13th Avenue APN 233-591-24-00, as alleged in ¶1958 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 210 E 13th Avenue APN 233-591-24-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1960. Plaintiffs seek to set aside the transfer of 210 E 13th Avenue APN 233-591-24-00.

1961. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1962. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND TWELFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1963. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1956-1962 of the Three Hundred And Eleventh Cause of Action.

1964. Plaintiffs believe that when 210 E 13th Avenue APN 233-591-24-00 was transferred, as alleged in ¶1958 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 210 E 13th Avenue APN 233-591-24-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1965. Plaintiffs seek to set aside the transfer of 210 E 13th Avenue APN 233-591-24-00.

1966. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1967. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

157. Transfer of 1160 S Broadway - Against the Diocese and Saint Mary Escondido RPSC

THREE HUNDRED AND THIRTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1968. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1969. Prior to September 1, 2019, the Diocese acquired the real property at 1160 South Broadway, Escondido 92025 ("1160 South Broadway")

1970. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 1160 South Broadway to Saint Mary Escondido RPSC.

1971. Plaintiffs believe and allege that on the date of the transfer of 1160 South Broadway, as alleged in ¶1970 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1160 South Broadway was made with the actual intent to hinder, delay, or defraud the creditors of the

Diocese in violation of Civil Code §3439.04(a)(1).

1972. Plaintiffs seek to set aside the transfer of 1160 South Broadway.

1973. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1974. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FOURTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1975. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1968-1974 of the Three Hundred And Thirteenth Cause of Action.

1976. Plaintiffs believe that when 1160 South Broadway was transferred, as alleged in ¶1970 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1160 South Broadway was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1977. Plaintiffs seek to set aside the transfer of 1160 South Broadway.

1978. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1979. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

158. Transfer of 156 E 13th Avenue - Against the Diocese and Saint Mary Escondido RPSC

THREE HUNDRED AND FIFTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1980. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1981. Prior to September 1, 2019, the Diocese acquired the real property at 156 E 13th Avenue, Escondido 92025 ("156 E 13th Avenue")

1982. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 156 E 13th Avenue to Saint Mary Escondido RPSC.

1983. Plaintiffs believe and allege that on the date of the transfer of 156 E 13th Avenue, as alleged in ¶1982 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 156 E 13th Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1984. Plaintiffs seek to set aside the transfer of 156 E 13th Avenue.

1985. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1986. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SIXTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

1987. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1980-1986 of the Three Hundred And Fifteenth Cause of Action.

1988. Plaintiffs believe that when 156 E 13th Avenue was transferred, as alleged in

¶1982 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 156 E 13th Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

1989. Plaintiffs seek to set aside the transfer of 156 E 13th Avenue.

1990. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1991. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

159. Transfer of 411 D Avenue - Against the Diocese and Saint Mary National City RPSC

THREE HUNDRED AND SEVENTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

1992. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

1993. Plaintiffs are informed and believe and thereupon allege that SAINT MARY CATHOLIC PARISH NATIONAL CITY IN NATIONAL CITY, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Mary National City RPSC") is a California religious corporation.

1994. Prior to September 1, 2019, the Diocese acquired the real property at 411 D Avenue, National City 91950 ("411 D Avenue")

1995. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 411 D Avenue to Saint Mary National City RPSC.

1996. Plaintiffs believe and allege that on the date of the transfer of 411 D Avenue, as

alleged in ¶1995 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 411 D Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

1997. Plaintiffs seek to set aside the transfer of 411 D Avenue.

1998. Plaintiffs are entitled to recover from the Diocese and Saint Mary National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

1999. The Diocese and Saint Mary National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND EIGHTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2000. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 1992-1999 of the Three Hundred And Seventeenth Cause of Action.

2001. Plaintiffs believe that when 411 D Avenue was transferred, as alleged in ¶1995 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 411 D Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2002. Plaintiffs seek to set aside the transfer of 411 D Avenue.

2003. Plaintiffs are entitled to recover from the Diocese and Saint Mary National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2004. The Diocese and Saint Mary National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

160. Transfer of 707 E Avenue - Against the Diocese and Saint Mary National City RPSC

THREE HUNDRED AND NINETEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2005. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2006. Prior to September 1, 2019, the Diocese acquired the real property at 707 E Avenue, National City 91950 ("707 E Avenue")

2007. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 707 E Avenue to Saint Mary National City RPSC.

2008. Plaintiffs believe and allege that on the date of the transfer of 707 E Avenue, as alleged in ¶2007 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 707 E Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2009. Plaintiffs seek to set aside the transfer of 707 E Avenue.

2010. Plaintiffs are entitled to recover from the Diocese and Saint Mary National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2011. The Diocese and Saint Mary National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND TWENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2012. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 2005-2011 of the Three Hundred And Nineteenth Cause of Action.

2013. Plaintiffs believe that when 707 E Avenue was transferred, as alleged in ¶2007 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 707 E Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2014. Plaintiffs seek to set aside the transfer of 707 E Avenue.

2015. Plaintiffs are entitled to recover from the Diocese and Saint Mary National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2016. The Diocese and Saint Mary National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

161. Transfer of 524 East 7th Street - Against the Diocese and Saint Mary National City RPSC

THREE HUNDRED AND TWENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2017. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2018. Prior to September 1, 2019, the Diocese acquired the real property at 524 East 7Th Street, National City 91950 ("524 East 7Th Street")

2019. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 524 East 7Th Street to Saint Mary National City RPSC.

2020. Plaintiffs believe and allege that on the date of the transfer of 524 East 7Th Street, as alleged in ¶2019 above, creditors, including Plaintiffs, had outstanding claims against

the Diocese, for which it was indebted, and that the transfer of 524 East 7Th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2021. Plaintiffs seek to set aside the transfer of 524 East 7Th Street.

2022. Plaintiffs are entitled to recover from the Diocese and Saint Mary National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2023. The Diocese and Saint Mary National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND TWENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2024. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2017-2023 of the Three Hundred And Twenty-First Cause of Action.

2025. Plaintiffs believe that when 524 East 7Th Street was transferred, as alleged in ¶2019 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 524 East 7Th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2026. Plaintiffs seek to set aside the transfer of 524 East 7Th Street.

2027. Plaintiffs are entitled to recover from the Diocese and Saint Mary National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2028. The Diocese and Saint Mary National City RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

162. Transfer of 15546 Pomerado Road - Against the Diocese and Saint Michael Poway RPSC

THREE HUNDRED AND TWENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2029. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2030. Plaintiffs are informed and believe and thereupon allege that SAINT MICHAEL CATHOLIC PARISH POWAY IN POWAY, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Michael Poway RPSC") is a California religious corporation.

2031. Prior to September 1, 2019, the Diocese acquired the real property at 15546 Pomerado Road, Poway 92064 ("15546 Pomerado Road")

2032. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 15546 Pomerado Road to Saint Michael Poway RPSC.

2033. Plaintiffs believe and allege that on the date of the transfer of 15546 Pomerado Road, as alleged in ¶2032 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 15546 Pomerado Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2034. Plaintiffs seek to set aside the transfer of 15546 Pomerado Road.

2035. Plaintiffs are entitled to recover from the Diocese and Saint Michael Poway RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2036. The Diocese and Saint Michael Poway RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND TWENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2037. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2029-2036 of the Three Hundred And Twenty-Third Cause of Action.

2038. Plaintiffs believe that when 15546 Pomerado Road was transferred, as alleged in ¶2032 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 15546 Pomerado Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2039. Plaintiffs seek to set aside the transfer of 15546 Pomerado Road.

2040. Plaintiffs are entitled to recover from the Diocese and Saint Michael Poway RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2041. The Diocese and Saint Michael Poway RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

163. Transfer of 15108 Pomerado Road - Against the Diocese and Saint Michael Poway RPSC

THREE HUNDRED AND TWENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2042. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2043. Prior to September 1, 2019, the Diocese acquired the real property at 15108 Pomerado Road, Poway 92064 ("15108 Pomerado Road")

2044. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese

transferred 15108 Pomerado Road to Saint Michael Poway RPSC.

2045. Plaintiffs believe and allege that on the date of the transfer of 15108 Pomerado Road, as alleged in ¶2044 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 15108 Pomerado Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2046. Plaintiffs seek to set aside the transfer of 15108 Pomerado Road.

2047. Plaintiffs are entitled to recover from the Diocese and Saint Michael Poway RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2048. The Diocese and Saint Michael Poway RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND TWENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2049. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2042-2048 of the Three Hundred And Twenty-Fifth Cause of Action.

2050. Plaintiffs believe that when 15108 Pomerado Road was transferred, as alleged in ¶2044 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 15108 Pomerado Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2051. Plaintiffs seek to set aside the transfer of 15108 Pomerado Road.

2052. Plaintiffs are entitled to recover from the Diocese and Saint Michael Poway RPSC

the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2053. The Diocese and Saint Michael Poway RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

164. Transfer of 15410 Pomerado Road - Against the Diocese and Saint Michael Poway RPSC

THREE HUNDRED AND TWENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2054. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2055. Prior to September 1, 2019, the Diocese acquired the real property at 15410 Pomerado Road, Poway 92064 ("15410 Pomerado Road")

2056. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 15410 Pomerado Road to Saint Michael Poway RPSC.

2057. Plaintiffs believe and allege that on the date of the transfer of 15410 Pomerado Road, as alleged in ¶2056 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 15410 Pomerado Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2058. Plaintiffs seek to set aside the transfer of 15410 Pomerado Road.

2059. Plaintiffs are entitled to recover from the Diocese and Saint Michael Poway RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2060. The Diocese and Saint Michael Poway RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND TWENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2061. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2054-2060 of the Three Hundred And Twenty-Seventh Cause of Action.

2062. Plaintiffs believe that when 15410 Pomerado Road was transferred, as alleged in ¶2056 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 15410 Pomerado Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2063. Plaintiffs seek to set aside the transfer of 15410 Pomerado Road.

2064. Plaintiffs are entitled to recover from the Diocese and Saint Michael Poway RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2065. The Diocese and Saint Michael Poway RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

165. Transfer of 2615 Homedale Street - Against the Diocese and Saint Michael San Diego RPSC

THREE HUNDRED AND TWENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2066. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2067. Plaintiffs are informed and believe and thereupon allege that SAINT MICHAEL CATHOLIC PARISH SAN DIEGO IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Michael RPSC") is a California religious corporation.

2068. Prior to September 1, 2019, the Diocese acquired the real property at 2615 Homedale Street, San Diego 92139 ("2615 Homedale Street")

2069. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 2615 Homedale Street to Saint Michael San Diego RPSC.

2070. Plaintiffs believe and allege that on the date of the transfer of 2615 Homedale Street, as alleged in ¶2069 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2615 Homedale Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2071. Plaintiffs seek to set aside the transfer of 2615 Homedale Street.

2072. Plaintiffs are entitled to recover from the Diocese and Saint Michael San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2073. The Diocese and Saint Michael San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND THIRTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2074. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2066-2073 of the Two Hundred And Twenty-Ninth Cause of Action.

2075. Plaintiffs believe that when 2615 Homedale Street was transferred, as alleged in ¶2069 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2615 Homedale Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in

violation of Civil Code §3439.05.

2076. Plaintiffs seek to set aside the transfer of 2615 Homedale Street.

2077. Plaintiffs are entitled to recover from the Diocese and Saint Michael Poway RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2078. The Diocese and Saint Michael Poway RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

166. Transfer of 133 E Church Street (APN Number 023-412-001-00) - Against the Diocese and Saint Patrick Calipatria RPSC

THREE HUNDRED AND THIRTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2079. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2080. Plaintiffs are informed and believe and thereupon allege that SAINT PATRICK CATHOLIC PARISH CALIPATRIA IN CALIPATRIA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Patrick Calipatria RPSC") is a California religious corporation.

2081. Prior to September 1, 2019, the Diocese acquired the real property at 133 E Church Street, Calipatria 92233 ("133 E Church Street APN 023-412-001-00").

2082. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese transferred 133 E Church Street APN 023-412-001-00 to Saint Patrick Calipatria RPSC.

2083. Plaintiffs believe and allege that on the date of the transfer of 133 E Church Street, as alleged in ¶2082 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 133 E Church Street APN 023-412-001-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2084. Plaintiffs seek to set aside the transfer of 133 E Church Street APN 023-412-001-00.

2085. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2086. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND THIRTY SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2087. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2079-1086 of the Three Hundred And Thirty-First Cause of Action.

2088. Plaintiffs believe that when 133 E Church Street APN 023-412-001-00 was transferred, as alleged in ¶2080 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 133 E Church Street APN 023-412-001-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2089. Plaintiffs seek to set aside the transfer of 133 E Church Street APN 023-412-001-00.

2090. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2091. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

167. Transfer of 3821 Adams Street - Against the Diocese and Saint Patrick Carlsbad RPSC

THREE HUNDRED AND THIRTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2092. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2093. Plaintiffs are informed and believe and thereupon allege that SAINT PATRICK CATHOLIC PARISH CARLSBAD IN CARLSBAD, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Patrick Carlsbad RPSC") is a California religious corporation.

2094. Prior to September 1, 2019, the Diocese acquired the real property at 3821 Adams Street, Carlsbad 92008 ("3821 Adams Street").

2095. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 3821 Adams Street to Saint Patrick Carlsbad RPSC.

2096. Plaintiffs believe and allege that on the date of the transfer of 3821 Adams Street, as alleged in ¶2095 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3821 Adams Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2097. Plaintiffs seek to set aside the transfer of 3821 Adams Street.

2098. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Carlsbad RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2099. The Diocese and Saint Patrick Carlsbad RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND THIRTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2100. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2092-2099 of the Three Hundred And Thirty-Third Cause of Action.

2101. Plaintiffs believe that when 3821 Adams Street was transferred, as alleged in ¶2095 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3821 Adams Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2102. Plaintiffs seek to set aside the transfer of 3821 Adams Street.

2103. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Carlsbad RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2104. The Diocese and Saint Patrick Carlsbad RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

168. Transfer of 3781 Adams Street - Against the Diocese and Saint Patrick Carlsbad RPSC

THREE HUNDRED AND THRTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2105. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2106. Prior to September 1, 2019, the Diocese acquired the real property at 3781 Adams Street, Carlsbad 92008 ("3781 Adams Street").

2107. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 3781 Adams Street to Saint Patrick Carlsbad RPSC.

2108. Plaintiffs believe and allege that on the date of the transfer of 3781 Adams Street, as alleged in ¶2107 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3781 Adams Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2109. Plaintiffs seek to set aside the transfer of 3781 Adams Street.

2110. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Carlsbad RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2111. The Diocese and Saint Patrick Carlsbad RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND THIRTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2112. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2105-2111 of the Three Hundred And Thirty-Fifth Cause of Action.

2113. Plaintiffs believe that when 3781 Adams Street was transferred, as alleged in ¶2107 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3781 Adams Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2114. Plaintiffs seek to set aside the transfer of 3781 Adams Street.

2115. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Carlsbad RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese

in the Underlying Actions, including any judgments awarded or entered.

2116. The Diocese and Saint Patrick Carlsbad RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

169. Transfer of 3801 Adams Street - Against the Diocese and Saint Patrick Carlsbad RPSC

THREE HUNDRED AND THIRTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2117. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2118. Prior to September 1, 2019, the Diocese acquired the real property at 3801 Adams Street, Carlsbad 92008 ("3801 Adams Street").

2119. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 3801 Adams Street to Saint Patrick Carlsbad RPSC.

2120. Plaintiffs believe and allege that on the date of the transfer of 3801 Adams Street, as alleged in ¶2119 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3801 Adams Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2121. Plaintiffs seek to set aside the transfer of 3801 Adams Street.

2122. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Carlsbad RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2123. The Diocese and Saint Patrick Carlsbad RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND THIRTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2124. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2117-2123 of the Three Hundred And Thirty-Seventh Cause of Action.

2125. Plaintiffs believe that when 3801 Adams Street was transferred, as alleged in ¶2119 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3801 Adams Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2126. Plaintiffs seek to set aside the transfer of 3801 Adams Street.

2127. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Carlsbad RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2128. The Diocese and Saint Patrick Carlsbad RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

170. Transfer of 1302 Tamarack Avenue - Against the Diocese and Saint Patrick Carlsbad RPSC

THREE HUNDRED AND THIRTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2129. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2130. Prior to September 1, 2019, the Diocese acquired the real property at 1302 Tamarack Avenue, Carlsbad 92008 ("1302 Tamarack Avenue").

2131. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 1302 Tamarack Avenue to Saint Patrick Carlsbad RPSC.

2132. Plaintiffs believe and allege that on the date of the transfer of 1302 Tamarack

Avenue, as alleged in ¶2131 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1302 Tamarack Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2133. Plaintiffs seek to set aside the transfer of 1302 Tamarack Avenue.

2134. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Carlsbad RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2135. The Diocese and Saint Patrick Carlsbad RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FORTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2136. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2129-2135 of the Three Hundred And Thirty-Ninth Cause of Action.

2137. Plaintiffs believe that when 1302 Tamarack Avenue was transferred, as alleged in ¶2131 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1302 Tamarack Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2138. Plaintiffs seek to set aside the transfer of 1302 Tamarack Avenue.

2139. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Carlsbad RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2140. The Diocese and Saint Patrick Carlsbad RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

171. Transfer of 3585 30th Street - Against the Diocese and Saint Patrick San Diego RPSC

THREE HUNDRED AND FORTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2141. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2142. Plaintiffs are informed and believe and thereupon allege that SAINT PATRICK CATHOLIC PARISH SAN DIEGO IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Patrick San Diego RPSC") is a California religious corporation.

2143. Prior to September 1, 2019, the Diocese acquired the real property at 3585 30th Street, San Diego 92104 ("3585 30th Street").

2144. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 3585 30th Street to Saint Patrick San Diego RPSC.

2145. Plaintiffs believe and allege that on the date of the transfer of 3585 30th Street, as alleged in ¶2144 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3585 30th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2146. Plaintiffs seek to set aside the transfer of 3585 30th Street.

2147. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2148. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FORTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2149. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2141-2148 of the Three Hundred And Forty-First Cause of Action.

2150. Plaintiffs believe that when 3585 30th Street was transferred, as alleged in ¶2144 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3585 30th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2151. Plaintiffs seek to set aside the transfer of 3585 30th Street.

2152. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2153. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

172. Transfer of 3593 30th Street - Against the Diocese and Saint Patrick San Diego RPSC

THREE HUNDRED AND FORTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2154. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2155. Prior to September 1, 2019, the Diocese acquired the real property at 3593 30th Street, San Diego 92104 ("3593 30th Street").

2156. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 3593 30th Street to Saint Patrick San Diego RPSC.

2157. Plaintiffs believe and allege that on the date of the transfer of 3593 30th Street, as alleged in ¶2156 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3593 30th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2158. Plaintiffs seek to set aside the transfer of 3593 30th Street.

2159. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2160. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FORTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2161. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2154-2160 of the Three Hundred And Forty-Third Cause of Action.

2162. Plaintiffs believe that when 3593 30th Street was transferred, as alleged in ¶2156 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3593 30th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2163. Plaintiffs seek to set aside the transfer of 3593 30th Street.

2164. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2165. The Diocese and Saint Patrick Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

173. Transfer of 3567 Ray St - Against the Diocese and Saint Patrick San Diego RPSC

THREE HUNDRED AND FORTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2166. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2167. Prior to September 1, 2019, the Diocese acquired the real property at 3567 Ray St, San Diego 92104 ("3567 Ray St").

2168. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 3567 Ray St to Saint Patrick San Diego RPSC.

2169. Plaintiffs believe and allege that on the date of the transfer of 3567 Ray St, as alleged in ¶2168 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3567 Ray St was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2170. Plaintiffs seek to set aside the transfer of 3567 Ray St.

2171. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2172. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FORTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2173. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2166-2172 of the Three Hundred And Forty-Fifth Cause of Action.

2174. Plaintiffs believe that when 3567 Ray St was transferred, as alleged in ¶2168 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3567 Ray St was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2175. Plaintiffs seek to set aside the transfer of 3567 Ray St.

2176. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2177. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

174. Transfer of 19 East 6th Street - Against the Diocese and Saint Patrick Calipatria RPSC

THREE HUNDRED AND FORTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2178. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2179. Prior to September 1, 2019, the Diocese acquired the real property at 19 East 6th Street, Calipatria 92231 ("19 East 6th Street").

2180. By Grant Deed recorded February 3, 2020 for no consideration, the Diocese

transferred 19 East 6th Street to Saint Patrick Calipatria RPSC.

2181. Plaintiffs believe and allege that on the date of the transfer of 19 East 6th Street, as alleged in ¶2180 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 19 East 6th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2182. Plaintiffs seek to set aside the transfer of 19 East 6th Street.

2183. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2184. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FORTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2185. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2178-2184 of the Three Hundred And Forty-Seventh Cause of Action.

2186. Plaintiffs believe that when 19 East 6th Street was transferred, as alleged in ¶2180 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 19 East 6th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2187. Plaintiffs seek to set aside the transfer of 19 East 6th Street.

2188. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria

RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2189. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

175. Transfer of 37 East Emerson Street - Against the Diocese and Saint Pius X Chula Vista RPSC

THREE HUNDRED AND FORTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2190. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2191. Plaintiffs are informed and believe and thereupon allege that SAINT PIUS X CATHOLIC PARISH CHULA VISTA IN CHULA VISTA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Pius X Chula Vista RPSC") is a California religious corporation.

2192. Prior to September 1, 2019, the Diocese acquired the real property at 37 East Emerson Street, Chula Vista 91911 ("37 East Emerson Street").

2193. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 37 East Emerson Street to Saint Pius X Chula Vista RPSC.

2194. Plaintiffs believe and allege that on the date of the transfer of 37 East Emerson Street, as alleged in ¶2193 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 37 East Emerson Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2195. Plaintiffs seek to set aside the transfer of 37 East Emerson Street.

2196. Plaintiffs are entitled to recover from the Diocese and Saint Pius X Chula Vista RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese

in the Underlying Actions, including any judgments awarded or entered.

2197. The Diocese and Saint Pius Chula Vista X did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FIFTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2198. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2190-2197 of the Three Hundred And Forty-Ninth Cause of Action.

2199. Plaintiffs believe that when 37 East Emerson Street was transferred, as alleged in ¶2193 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 37 East Emerson Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2200. Plaintiffs seek to set aside the transfer of 37 East Emerson Street.

2201. Plaintiffs are entitled to recover from the Diocese and Saint Pius X Chula Vista RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2202. The Diocese and Saint Pius X Chula Vista RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

176. Transfer of 36 East Naples Street - Against the Diocese and Saint Pius X Chula Vista RPSC

THREE HUNDRED AND FIFTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2203. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2204. Prior to September 1, 2019, the Diocese acquired the real property at 36 East Naples Street, Chula Vista 91911 ("36 East Naples Street").

2205. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 36 East Naples Street to Saint Pius X Chula Vista RPSC.

2206. Plaintiffs believe and allege that on the date of the transfer of 36 East Naples Street, as alleged in ¶2206 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 36 East Naples Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2207. Plaintiffs seek to set aside the transfer of 36 East Naples Street.

2208. Plaintiffs are entitled to recover from the Diocese and Saint Pius X Chula Vista RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2209. The Diocese and Saint Pius X Chula Vista RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FIFTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2210. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2203-2209 of the Three Hundred And Fifty-First Cause of Action.

2211. Plaintiffs believe that when 36 East Naples Street was transferred, as alleged in ¶2206 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 36 East Naples Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in

violation of Civil Code §3439.05.

2212. Plaintiffs seek to set aside the transfer of 36 East Naples Street.

2213. Plaintiffs are entitled to recover from the Diocese and Saint Pius X Chula Vista RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2214. The Diocese and Saint Pius X Chula Vista RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

177. Transfer of 14107 Lyons Valley Rd - Against the Diocese and Saint Pius X Jamul RPSC

THREE HUNDRED AND FIFTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2215. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2216. Plaintiffs are informed and believe and thereupon allege that SAINT PIUS X CATHOLIC PARISH JAMUL IN JAMUL, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Pius X Jamul RPSC") is a California religious corporation.

2217.

2218. Prior to September 1, 2019, the Diocese acquired the real property at 14107 Lyons Valley Road, Jamul, 91935 ("14107 Lyons Valley Road").

2219. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 14107 Lyons Valley Road to Saint Pius X Jamul RPSC.

2220. Plaintiffs believe and allege that on the date of the transfer of 14107 Lyons Valley Road, as alleged in ¶2219 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 14107 Lyons Valley Road was made with the actual intent to hinder, delay, or defraud the creditors of

the Diocese in violation of Civil Code §3439.04(a)(1).

2221. Plaintiffs seek to set aside the transfer of 14107 Lyons Valley Road.

2222. Plaintiffs are entitled to recover from the Diocese and Saint Pius X Jamul RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2223. The Diocese and Saint Pius X Jamul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FIFTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2224. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2215-2223 of the Three Hundred And Fifty-Third Cause of Action.

2225. Plaintiffs believe that when 14107 Lyons Valley Road was transferred, as alleged in ¶2219 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 14107 Lyons Valley Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2226. Plaintiffs seek to set aside the transfer of 14107 Lyons Valley Road.

2227. Plaintiffs are entitled to recover from the Diocese and Saint Pius X Jamul RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2228. The Diocese and Saint Pius X Jamul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

178. Transfer of 611 Diamond Bar Road - Against the Diocese and Saint Richard RPSC

THREE HUNDRED AND FIFTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2229. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2230. Plaintiffs are informed and believe and thereupon allege that SAINT RICHARD CATHOLIC PARISH IN BORREGO SPRINGS, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Richard RPSC") is a California religious corporation.

2231. Prior to September 1, 2019, the Diocese acquired the real property at 611 Diamond Bar Road, Borrego Springs, 92004 ("611 Diamond Bar Road").

2232. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 611 Diamond Bar Road to Saint Richard RPSC.

2233. Plaintiffs believe and allege that on the date of the transfer of 611 Diamond Bar Road, as alleged in ¶2233 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 611 Diamond Bar Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2234. Plaintiffs seek to set aside the transfer of 611 Diamond Bar Road.

2235. Plaintiffs are entitled to recover from the Diocese and Saint Richard the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2236. The Diocese and Saint Richard did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FIFTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2237. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2229-2236 of the Three Hundred And Fifty-Fifth Cause of Action.

2238. Plaintiffs believe that when 611 Diamond Bar Road was transferred, as alleged in ¶2233 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 611 Diamond Bar Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2239. Plaintiffs seek to set aside the transfer of 611 Diamond Bar Road.

2240. Plaintiffs are entitled to recover from the Diocese and Saint Richard the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2241. The Diocese and Saint Richard RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

179. Transfer of 5124 Churchward Street - Against the Diocese and Saint Rita RPSC

THREE HUNDRED AND FIFTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2242. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2243. Plaintiffs are informed and believe and thereupon allege that SAINT RITA CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Rita RPSC") is a California religious corporation.

2244. Prior to September 1, 2019, the Diocese acquired the real property at 5124 Churchward Street, San Diego 92114 ("5124 Churchward Street").

2245. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 5124 Churchward Street to Saint Rita RPSC.

2246. Plaintiffs believe and allege that on the date of the transfer of 5124 Churchward Street, as alleged in ¶2245 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5124 Churchward Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2247. Plaintiffs seek to set aside the transfer of 5124 Churchward Street.

2248. Plaintiffs are entitled to recover from the Diocese and Saint Rita RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2249. The Diocese and Saint Rita RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND FIFTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2250. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2242-2249 of the Three Hundred And Fifty-Seventh Cause of Action.

2251. Plaintiffs believe that when 5124 Churchward Street was transferred, as alleged in ¶2245 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5124 Churchward Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2252. Plaintiffs seek to set aside the transfer of 5124 Churchward Street.

2253. Plaintiffs are entitled to recover from the Diocese and Saint Rita RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2254. The Diocese and Saint Rita RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

180. Transfer of 5115 Churchward Street - Against the Diocese and Saint Rita RPSC

THREE HUNDRED AND FIFTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2255. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2256. Prior to September 1, 2019, the Diocese acquired the real property at 5115 Churchward Street, San Diego 92114 ("5115 Churchward Street").

2257. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 5115 Churchward Street to Saint Rita RPSC.

2258. Plaintiffs believe and allege that on the date of the transfer of 5115 Churchward Street, as alleged in ¶2257 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5115 Churchward Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2259. Plaintiffs seek to set aside the transfer of 5115 Churchward Street.

2260. Plaintiffs are entitled to recover from the Diocese and Saint Rita RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2261. The Diocese and Saint Rita RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SIXTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2262. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2255-2261 of the Three Hundred And Fifty-Ninth Cause of Action.

2263. Plaintiffs believe that when 5115 Churchward Street was transferred, as alleged in ¶2257 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5115 Churchward Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2264. Plaintiffs seek to set aside the transfer of 5115 Churchward Street.

2265. Plaintiffs are entitled to recover from the Diocese and Saint Rita RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2266. The Diocese and Saint Rita RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

181. Transfer of 5165 Imperial Ave - Against the Diocese and Saint Rita RPSC

THREE HUNDRED AND SIXTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2267. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2268. Prior to September 1, 2019, the Diocese acquired the real property at 5165 Imperial Ave, San Diego 92114 ("5165 Imperial Ave").

2269. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese

transferred 5165 Imperial Ave to Saint Rita RPSC.

2270. Plaintiffs believe and allege that on the date of the transfer of 5165 Imperial Ave, as alleged in ¶2269 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5165 Imperial Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2271. Plaintiffs seek to set aside the transfer of 5165 Imperial Ave.

2272. Plaintiffs are entitled to recover from the Diocese and Saint Rita RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2273. The Diocese and Saint Rita RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SIXTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2274. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2267-2273 of the Three Hundred And Sixty-First Cause of Action.

2275. Plaintiffs believe that when 5165 Imperial Ave was transferred, as alleged in ¶2269 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5165 Imperial Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2276. Plaintiffs seek to set aside the transfer of 5165 Imperial Ave.

2277. Plaintiffs are entitled to recover from the Diocese and Saint Rita RPSC the full

amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2278. The Diocese and Saint Rita RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

182. Transfer of 293 H Street - Against the Diocese and Saint Rose of Lima RPSC

THREE HUNDRED AND SIXTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2279. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2280. Plaintiffs are informed and believe and thereupon allege that SAINT ROSE OF LIMA CATHOLIC PARISH IN CHULA VISTA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Rose of Lima RPSC") is a California religious corporation.

2281. Prior to September 1, 2019, the Diocese acquired the real property at 293 H Street, Chula Vista 91910 ("293 H Street").

2282. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 293 H Street to Saint Rose of Lima RPSC.

2283. Plaintiffs believe and allege that on the date of the transfer of 293 H Street, as alleged in ¶2282 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 293 H Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2284. Plaintiffs seek to set aside the transfer of 293 H Street.

2285. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

2286. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SIXTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2287. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2279-2286 of the Three Hundred And Sixty-Third Cause of Action.

2288. Plaintiffs believe that when 293 H Street was transferred, as alleged in ¶2282 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 293 H Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2289. Plaintiffs seek to set aside the transfer of 293 H Street.

2290. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2291. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

183. Transfer of 268 Alvarado Street - Against the Diocese and Saint Rose of Lima RPSC

THREE HUNDRED AND SIXTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2292. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2293. Prior to September 1, 2019, the Diocese acquired the real property at 268 Alvarado Street, Chula Vista 91910 ("268 Alvarado Street").

2294. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 268 Alvarado Street to Saint Rose of Lima RPSC.

2295. Plaintiffs believe and allege that on the date of the transfer of 268 Alvarado Street, as alleged in ¶2294 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 268 Alvarado Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2296. Plaintiffs seek to set aside the transfer of 268 Alvarado Street.

2297. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2298. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SIXTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2299. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2292-2298 of the Three Hundred And Sixty-Fifth Cause of Action.

2300. Plaintiffs believe that when 268 Alvarado Street was transferred, as alleged in ¶2294 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 268 Alvarado Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil

Code §3439.05.

2301. Plaintiffs seek to set aside the transfer of 268 Alvarado Street.

2302. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2303. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

184. Transfer of 278 Alvarado Street Unit 1-2 - Against the Diocese and Saint Rose of Lima RPSC

THREE HUNDRED AND SIXTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2304. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2305. Prior to September 1, 2019, the Diocese acquired the real property at 278 Alvarado Street Unit 1-2, Chula Vista 91910 ("278 Alvarado Street Unit 1-2").

2306. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 278 Alvarado Street Unit 1-2 to Saint Rose of Lima RPSC.

2307. Plaintiffs believe and allege that on the date of the transfer of 278 Alvarado Street Unit 1-2, as alleged in ¶2307 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 278 Alvarado Street Unit 1-2was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2308. Plaintiffs seek to set aside the transfer of 278 Alvarado Street Unit 1-2.

2309. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2310. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SIXTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2311. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2304-2310 of the Three Hundred And Sixty-Seventh Cause of Action.

2312. Plaintiffs believe that when 278 Alvarado Street Unit 1-2was transferred, as alleged in ¶2307 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 278 Alvarado Street Unit 1-2 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2313. Plaintiffs seek to set aside the transfer of 278 Alvarado Street Unit 1-2.

2314. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2315. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

185. Transfer of 473 3rd Avenue - Against the Diocese and Saint Rose of Lima RPSC

THREE HUNDRED AND SIXTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2316. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2317. Prior to September 1, 2019, the Diocese acquired the real property 473 3rd

Avenue, Chula Vista 91910 ("473 3rd Avenue").

2318. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 473 3rd Avenue to Saint Rose of Lima RPSC.

2319. Plaintiffs believe and allege that on the date of the transfer of 473 3rd Avenue, as alleged in ¶2318 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 473 3rd Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2320. Plaintiffs seek to set aside the transfer of 473 3rd Avenue.

2321. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2322. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SEVENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2323. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2316-2322 of the Three Hundred And Sixty-Ninth Cause of Action.

2324. Plaintiffs believe that when 473 3rd Avenue was transferred, as alleged in ¶2318 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 473 3rd Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2325. Plaintiffs seek to set aside the transfer of 473 3rd Avenue.

2326. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2327. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

186. Transfer of 31020 Cole Grade Road - Against the Diocese and Saint Stephen RPSC

THREE HUNDRED AND SEVENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2328. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2329. Plaintiffs are informed and believe and thereupon allege that SAINT STEPHEN CATHOLIC PARISH IN VALLEY CENTER, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Stephen RPSC") is a California religious corporation.

2330. Prior to September 1, 2019, the Diocese acquired the real property at 31020 Cole Grade Road, Valley Center, 92082 ("31020 Cole Grade Road").

2331. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 31020 Cole Grade Road to Saint Stephen RPSC.

2332. Plaintiffs believe and allege that on the date of the transfer of 31020 Cole Grade Road, as alleged in ¶2331 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 31020 Cole Grade Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2333. Plaintiffs seek to set aside the transfer of 31020 Cole Grade Road.

2334. Plaintiffs are entitled to recover from the Diocese and Saint Stephen RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2335. The Diocese and Saint Stephen RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SEVENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2336. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2328-2335 of the Three Hundred And Seventy-First Cause of Action.

2337. Plaintiffs believe that when 31020 Cole Grade Road was transferred, as alleged in ¶2331 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 31020 Cole Grade Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2338. Plaintiffs seek to set aside the transfer of 31020 Cole Grade Road.

2339. Plaintiffs are entitled to recover from the Diocese and Saint Stephen RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2340. The Diocese and Saint Stephen RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

187. Transfer of 4333 Del Mar Trails Road - Against the Diocese and Saint Therese of Carmel RPSC

THREE HUNDRED AND SEVENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2341. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2342. Plaintiffs are informed and believe and thereupon allege that SAINT THERESE OF CARMEL CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Therese of Carmel RPSC") is a California religious corporation.

2343. Prior to September 1, 2019, the Diocese acquired the real property at 4333 Del Mar Trails Road, San Diego 92130 ("4333 Del Mar Trails Road").

2344. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 4333 Del Mar Trails Road to Saint Therese of Carmel RPSC.

2345. Plaintiffs believe and allege that on the date of the transfer of 4333 Del Mar Trails Road, as alleged in ¶2344 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4333 Del Mar Trails Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2346. Plaintiffs seek to set aside the transfer of 4333 Del Mar Trails Road.

2347. Plaintiffs are entitled to recover from the Diocese and Saint Therese of Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2348. The Diocese and Saint Therese of Carmel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SEVENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2349. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations and 2341-2348 of the Three Hundred And Seventy-Third Cause of Action.

2350. Plaintiffs believe that when 4333 Del Mar Trails Road was transferred, as alleged in ¶2344 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4333 Del Mar Trails Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2351. Plaintiffs seek to set aside the transfer of 4333 Del Mar Trails Road.

2352. Plaintiffs are entitled to recover from the Diocese and Saint Therese of Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2353. The Diocese and Saint Therese of Carmel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

188. Transfer of 4618 Cypress Glen Place - Against the Diocese and Saint Therese of Carmel RPSC

THREE HUNDRED AND SEVENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2354. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2355. Prior to September 1, 2019, the Diocese acquired the real property at 4618 Cypress Glen Place, San Diego 92130 ("4618 Cypress Glen Place").

2356. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 4618 Cypress Glen Place to Saint Therese of Carmel RPSC.

2357. Plaintiffs believe and allege that on the date of the transfer of 4618 Cypress Glen Place, as alleged in ¶2356 above, creditors, including Plaintiffs, had outstanding claims

against the Diocese, for which it was indebted, and that the transfer of 4618 Cypress Glen Place was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2358. Plaintiffs seek to set aside the transfer of 4618 Cypress Glen Place.

2359. Plaintiffs are entitled to recover from the Diocese and Saint Therese of Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2360. The Diocese and Saint Therese of Carmel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SEVENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2361. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2354-2360 of the Three Hundred And Seventy-Fifth Cause of Action.

2362. Plaintiffs believe that when 4618 Cypress Glen Place was transferred, as alleged in ¶2356 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4618 Cypress Glen Place was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2363. Plaintiffs seek to set aside the transfer of 4618 Cypress Glen Place.

2364. Plaintiffs are entitled to recover from the Diocese and Saint Therese of Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2365. The Diocese and Saint Therese of Carmel RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

189. Transfer of 4077 Ibis Street - Against the Diocese and Saint Vincent De Paul RPSC

THREE HUNDRED AND SEVENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2366. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2367. Plaintiffs are informed and believe and thereupon allege that SAINT VINCENT DE PAUL CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Vincent De Paul RPSC") is a California religious corporation.

2368. Prior to September 1, 2019, the Diocese acquired the real property 4077 Ibis Street, San Diego 92103 ("4077 Ibis Street").

2369. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 4077 Ibis Street to Saint Vincent De Paul RPSC.

2370. Plaintiffs believe and allege that on the date of the transfer of 4077 Ibis Street, as alleged in ¶2369 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4077 Ibis Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2371. Plaintiffs seek to set aside the transfer of 4077 Ibis Street.

2372. Plaintiffs are entitled to recover from the Diocese and Saint Vincent De Paul RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2373. The Diocese and Saint Vincent De Paul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND SEVENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2374. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2366-2373 of the Three Hundred And Seventy-Seventh Cause of Action.

2375. Plaintiffs believe that when 4077 Ibis Street was transferred, as alleged in ¶2369 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4077 Ibis Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2376. Plaintiffs seek to set aside the transfer of 4077 Ibis Street.

2377. Plaintiffs are entitled to recover from the Diocese and Saint Vincent De Paul RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2378. The Diocese and Saint Vincent De Paul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

190. Transfer of 4114 Ibis Street - Against the Diocese and Saint Vincent De Paul RPSC

THREE HUNDRED AND SEVENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2379. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2380. Prior to September 1, 2019, the Diocese acquired the real property 4114 Ibis Street, San Diego 92103 ("4114 Ibis Street").

2381. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese

transferred 4114 Ibis Street to Saint Vincent De Paul RPSC.

2382. Plaintiffs believe and allege that on the date of the transfer of 4114 Ibis Street, as alleged in ¶2381 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4114 Ibis Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2383. Plaintiffs seek to set aside the transfer of 4114 Ibis Street.

2384. Plaintiffs are entitled to recover from the Diocese and Saint Vincent De Paul RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2385. The Diocese and Saint Vincent De Paul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND EIGHTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2386. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2379-2385 of the Three Hundred And Seventy-Ninth Cause of Action.

2387. Plaintiffs believe that when 4114 Ibis Street was transferred, as alleged in ¶2381 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4114 Ibis Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2388. Plaintiffs seek to set aside the transfer of 4114 Ibis Street.

2389. Plaintiffs are entitled to recover from the Diocese and Saint Vincent De Paul

RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2390. The Diocese and Saint Vincent De Paul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

191. Transfer of 4176 Ibis Street - Against the Diocese and Saint Vincent De Paul RPSC

THREE HUNDRED AND EIGHTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2391. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2392. Prior to September 1, 2019, the Diocese acquired the real property 4176 Ibis Street, San Diego 92103 ("4176 Ibis Street").

2393. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 4176 Ibis Street to Saint Vincent De Paul RPSC.

2394. Plaintiffs believe and allege that on the date of the transfer of 4176 Ibis Street, as alleged in ¶2393 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4176 Ibis Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2395. Plaintiffs seek to set aside the transfer of 4176 Ibis Street.

2396. Plaintiffs are entitled to recover from the Diocese and Saint Vincent De Paul RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2397. The Diocese and Saint Vincent De Paul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND EIGHTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2398. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2391-2379 of the Three Hundred And Eighty-First Cause of Action.

2399. Plaintiffs believe that when 4176 Ibis Street was transferred, as alleged in ¶2393 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4176 Ibis Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2400. Plaintiffs seek to set aside the transfer of 4176 Ibis Street.

2401. Plaintiffs are entitled to recover from the Diocese and Saint Vincent De Paul RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2402. The Diocese and Saint Vincent De Paul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

192. Transfer of 4080 Hawk Street - Against the Diocese and Saint Vincent De Paul RPSC

THREE HUNDRED AND EIGHTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2403. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2404. Prior to September 1, 2019, the Diocese acquired the real property 4080 Hawk Street, San Diego 92103 ("4080 Hawk Street").

2405. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 4080 Hawk Street to Saint Vincent De Paul RPSC.

2406. Plaintiffs believe and allege that on the date of the transfer of 4080 Hawk Street, as alleged in ¶2405 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4080 Hawk Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2407. Plaintiffs seek to set aside the transfer of 4080 Hawk Street.

2408. Plaintiffs are entitled to recover from the Diocese and Saint Vincent De Paul RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2409. The Diocese and Saint Vincent De Paul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND EIGHTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2410. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2403-2409 of the Three Hundred And Eighty-Third Cause of Action.

2411. Plaintiffs believe that when 4080 Hawk Street was transferred, as alleged in ¶2405 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4080 Hawk Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2412. Plaintiffs seek to set aside the transfer of 4080 Hawk Street.

2413. Plaintiffs are entitled to recover from the Diocese and Saint Vincent De Paul RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese

in the Underlying Actions, including any judgments awarded or entered.

2414. The Diocese and Saint Vincent De Paul RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

193. Transfer of 17226 Bernardo Center Drive - Against the Diocese and San Rafael RPSC

THREE HUNDRED AND EIGHTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2415. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2416. Plaintiffs are informed and believe and thereupon allege SAN RAFAEL CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("San Rafael RPSC") is a California religious corporation.

2417. Prior to September 1, 2019, the Diocese acquired the real property 17226 Bernardo Center Drive, San Diego 92128 ("17226 Bernardo Center Drive").

2418. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 17226 Bernardo Center Drive to San Rafael RPSC.

2419. Plaintiffs believe and allege that on the date of the transfer of 17226 Bernardo Center Drive, as alleged in ¶2418 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 17226 Bernardo Center Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2420. Plaintiffs seek to set aside the transfer of 17226 Bernardo Center Drive.

2421. Plaintiffs are entitled to recover from the Diocese and San Rafael RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2422. The Diocese and San Rafael RPSC did the things herein alleged maliciously and

to oppress the Diocese's creditors.

THREE HUNDRED AND EIGHTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2423. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2415-2422 of the Three Hundred And Eighty-Fifth Cause of Action.

2424. Plaintiffs believe that when 17226 Bernardo Center Drive was transferred, as alleged in ¶2418 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 17226 Bernardo Center Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2425. Plaintiffs seek to set aside the transfer of 17226 Bernardo Center Drive.

2426. Plaintiffs are entitled to recover from the Diocese and San Rafael RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2427. The Diocese and San Rafael RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

194. Transfer of 17250 Bernardo Center Drive - Against the Diocese and San Rafael RPSC

THREE HUNDRED AND EIGHTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2428. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2429. Prior to September 1, 2019, the Diocese acquired the real property 17250 Bernardo Center Drive, San Diego 92128 ("17250 Bernardo Center Drive").

2430. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 17250 Bernardo Center Drive to San Rafael RPSC.

2431. Plaintiffs believe and allege that on the date of the transfer of 17250 Bernardo Center Drive, as alleged in ¶2430 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 17250 Bernardo Center Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2432. Plaintiffs seek to set aside the transfer of 17250 Bernardo Center Drive.

2433. Plaintiffs are entitled to recover from the Diocese and San Rafael RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2434. The Diocese and San Rafael RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND EIGHTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2435. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2428-2434 of the Three Hundred And Eighty-Seventh Cause of Action.

2436. Plaintiffs believe that when 17250 Bernardo Center Drive was transferred, as alleged in ¶2430 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 17250 Bernardo Center Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2437. Plaintiffs seek to set aside the transfer of 17250 Bernardo Center Drive.

2438. Plaintiffs are entitled to recover from the Diocese and San Rafael RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2439. The Diocese and San Rafael RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

195. Transfer of 9800 San Juan Street - Against the Diocese and Santa Sophia RPSC

THREE HUNDRED AND EIGHTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2440. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2441. Plaintiffs are informed and believe and thereupon allege SANTA SOPHIA CATHOLIC PARISH IN SPRING VALLEY, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Santa Sophia RPSC") is a California religious corporation.

2442. Prior to September 1, 2019, the Diocese acquired the real property at 9800 San Juan Street, Spring Valley 91977 ("9800 San Juan Street").

2443. By Grant Deed recorded December 26, 2019 for no consideration, the Diocese transferred 9800 San Juan Street to Santa Sophia RPSC.

2444. Plaintiffs believe and allege that on the date of the transfer of 9800 San Juan Street, as alleged in ¶2443 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 9800 San Juan Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2445. Plaintiffs seek to set aside the transfer of 9800 San Juan Street.

2446. Plaintiffs are entitled to recover from the Diocese and Santa Sophia RPSC the full

amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2447. The Diocese and Santa Sophia RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND NINETIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2448. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2440-2447 of the Three Hundred And Eighty-Ninth Cause of Action.

2449. Plaintiffs believe that when 9800 San Juan Street was transferred, as alleged in ¶2443 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 9800 San Juan Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2450. Plaintiffs seek to set aside the transfer of 9800 San Juan Street.

2451. Plaintiffs are entitled to recover from the Diocese and Santa Sophia RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2452. The Diocese and Santa Sophia RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

196. Transfer of APN Number 110-260-04-00 - Against the Diocese and San Antonio De Pala RPSC

THREE HUNDRED AND NINETY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2453. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

2454. Plaintiffs are informed and believe and thereupon allege MISSION SAN ANTONIO DE PALA CATHOLIC PARISH IN PALA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("San Antonio De Pala RPSC") is a California religious corporation.

2455. Prior to September 1, 2019, the Diocese acquired the real property Tax Parcel Number 110-260-04-00 ("110-260-04-00").

2456. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 110-260-04-00 to San Antonio De Pala RPSC.

2457. Plaintiffs believe and allege that on the date of the transfer of 110-260-04-00, as alleged in ¶2456 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 110-260-04-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2458. Plaintiffs seek to set aside the transfer of 110-260-04-00.

2459. Plaintiffs are entitled to recover from the Diocese and San Antonio De Pala RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2460. The Diocese and San Antonio De Pala RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND NINETY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2461. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2453-2460 of the Three Hundred And Ninety-First Cause of Action.

2462. Plaintiffs believe that when 110-260-04-00 was transferred, as alleged in ¶2456 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 110-260-04-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2463. Plaintiffs seek to set aside the transfer of 110-260-04-00.

2464. Plaintiffs are entitled to recover from the Diocese and San Antonio de Pala RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2465. The Diocese and San Antonio De Pala RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

197. Transfer of APN Number 198-020-38-00 - Against the Diocese and Saint Richard RPSC

THREE HUNDRED AND NINETY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2466. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2467. Prior to September 1, 2019, the Diocese acquired the real property Tax Parcel Number 198-020-38-00 ("198-020-38-00").

2468. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 198-020-38-00 to Saint Richard RPSC.

2469. Plaintiffs believe and allege that on the date of the transfer of 198-020-38-00, as alleged in ¶2468 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 198-020-38-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of

Civil Code §3439.04(a)(1).

2470. Plaintiffs seek to set aside the transfer of 198-020-38-00.

2471. Plaintiffs are entitled to recover from the Diocese and Saint Richard RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2472. The Diocese and Saint Richard RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED NINETY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2473. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2466-2472 of the Three Hundred And Ninety-Third Cause of Action.

2474. Plaintiffs believe that when 198-020-38-00 was transferred, as alleged in ¶2468 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 198-020-38-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2475. Plaintiffs seek to set aside the transfer of 198-020-38-00.

2476. Plaintiffs are entitled to recover from the Diocese and Saint Richard RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2477. The Diocese and Saint Richard RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

198. Transfer of APN Number 198-020-43-00 - Against the Diocese and Saint Richard RPSC

THREE HUNDRED AND NINETY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2478. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2479. Prior to September 1, 2019, the Diocese acquired the real property Tax Parcel Number 198-020-43-00 ("198-020-43-00").

2480. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 198-020-43-00 to Saint Richard RPSC.

2481. Plaintiffs believe and allege that on the date of the transfer of 198-020-43-00, as alleged in ¶2480 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 198-020-43-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2482. Plaintiffs seek to set aside the transfer of 198-020-43-00.

2483. Plaintiffs are entitled to recover from the Diocese and Saint Richard RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2484. The Diocese and Saint Richard RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED NINETY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2485. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2478-2484 of the Three Hundred And Ninety-Fifth Cause of Action.

2486. Plaintiffs believe that when 198-020-43-00 was transferred, as alleged in ¶2480

above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 198-020-43-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2487. Plaintiffs seek to set aside the transfer of 198-020-43-00.

2488. Plaintiffs are entitled to recover from the Diocese and Saint Richard RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2489. The Diocese and Saint Richard RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

199. Transfer of APN Number 239-331-02-00 - Against the Diocese and Saint Timothy RPSC

THREE HUNDRED AND NINETY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2490. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2491. Plaintiffs are informed and believe and thereupon allege SAINT TIMOTHY CATHOLIC PARISH IN ESCONDIDO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Timothy RPSC") is a California religious corporation.

2492. Prior to September 1, 2019, the Diocese acquired the real property Tax Parcel Number 239-331-02-00 ("239-331-02-00").

2493. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 239-331-02-00 to Saint Timothy RPSC.

2494. Plaintiffs believe and allege that on the date of the transfer of 239-331-02-00, as alleged in ¶2493 above, creditors, including Plaintiffs, had outstanding claims against the

Diocese, for which it was indebted, and that the transfer of 239-331-02-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2495. Plaintiffs seek to set aside the transfer of 239-331-02-00.

2496. Plaintiffs are entitled to recover from the Diocese and Saint Timothy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2497. The Diocese and Saint Timothy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

THREE HUNDRED AND NINETY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2498. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2490-2497 of the Three Hundred And Ninety-Seventh Cause of Action.

2499. Plaintiffs believe that when 239-331-02-00 was transferred, as alleged in ¶2493 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 239-331-02-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2500. Plaintiffs seek to set aside the transfer of 239-331-02-00.

2501. Plaintiffs are entitled to recover from the Diocese and Saint Timothy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2502. The Diocese and Saint Timothy RPSC did the things herein alleged maliciously

and to oppress the Diocese's creditors.

200. ***Transfer of APN Number 259-310-04-00 - Against the Diocese and Saint John the Evangelist Encinitas RPSC***

THREE HUNDREDTH AND NINETY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2503. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2504. Prior to September 1, 2019, the Diocese acquired Tax Parcel Number 259-310-04-00 ("259-310-04-00").

2505. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 259-310-04-00 to Saint John the Evangelist Encinitas RPSC.

2506. Plaintiffs believe and allege that on the date of the transfer of 259-310-04-00, as alleged in ¶2505 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 259-310-04-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2507. Plaintiffs seek to set aside the transfer of 259-310-04-00.

2508. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2509. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDREDTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2510. Plaintiff re-allege and incorporate by this reference paragraphs 1- 34 of the Preliminary Allegations and 2503-2509 of the Three Hundred And Ninety-Ninth Cause

of Action.

2511. Plaintiffs believe that when 259-310-04-00 was transferred, as alleged in ¶2505 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 259-310-04-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2512. Plaintiffs seek to set aside the transfer of 259-310-04-00.

2513. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2514. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

201. ***Transfer of APN Number 259-311-07-00 - Against the Diocese and Saint John the Evangelist Encinitas RPSC***

FOUR HUNDRED AND FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2515. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2516. Prior to September 1, 2019, the Diocese acquired Tax Parcel Number 259-311-07-00 ("259-311-07-00").

2517. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 259-311-07-00 to Saint John the Evangelist Encinitas RPSC.

2518. Plaintiffs believe and allege that on the date of the transfer of 259-311-07-00, as alleged in ¶2517 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 259-311-07-00 was made with

the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2519. Plaintiffs seek to set aside the transfer of 259-311-07-00.

2520. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2521. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2522. Plaintiff re-allege and incorporate by this reference paragraphs 1- 34 of the Preliminary Allegations and 2515-2521 of the Four Hundred And First Cause of Action.

2523. Plaintiffs believe that when 259-311-07-00 was transferred, as alleged in ¶2517 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 259-311-07-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2524. Plaintiffs seek to set aside the transfer of 259-311-07-00.

2525. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2526. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

202. ***Transfer of APN Number 259-311-06-00 - Against the Diocese and Saint John the Evangelist Encinitas RPSC***

FOUR HUNDRED AND THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2527. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2528. Prior to September 1, 2019, the Diocese acquired Tax Parcel Number 259-311-06-00 ("259-311-06-00").

2529. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 259-311-06-00 to Saint John the Evangelist Encinitas RPSC.

2530. Plaintiffs believe and allege that on the date of the transfer of 259-311-06-00, as alleged in ¶2529 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 259-311-06-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2531. Plaintiffs seek to set aside the transfer of 259-311-06-00.

2532. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2533. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2534. Plaintiff re-allege and incorporate by this reference paragraphs 1- 34 of the Preliminary Allegations and 2527-2533 of the Four Hundred And Third Cause of Action.

2535. Plaintiffs believe that when 259-311-06-00 was transferred, as alleged in ¶2529

above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 259-311-06-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2536. Plaintiffs seek to set aside the transfer of 259-311-06-00.

2537. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2538. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

203. ***Transfer of APN Number 259-311-11-00 - Against the Diocese and Saint John the Evangelist Encinitas RPSC***

FOUR HUNDRED AND FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2539. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2540. Prior to September 1, 2019, the Diocese acquired Tax Parcel Number 259-311-11-00 ("259-311-11-00").

2541. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 259-311-11-00 to Saint John the Evangelist RPSC.

2542. Plaintiffs believe and allege that on the date of the transfer of 259-311-11-00, as alleged in ¶2541 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 259-311-11-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2543. Plaintiffs seek to set aside the transfer of 259-311-11-00.

2544. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2545. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2546. Plaintiff re-allege and incorporate by this reference paragraphs 1- 34 of the Preliminary Allegations and 2539-2545 of the Four Hundred And Fifth Cause of Action.

2547. Plaintiffs believe that when 259-311-11-00 was transferred, as alleged in ¶2541 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 259-311-11-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2548. Plaintiffs seek to set aside the transfer of 259-311-11-00.

2549. Plaintiffs are entitled to recover from the Diocese and Saint John the Evangelist Encinitas RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2550. The Diocese and Saint John the Evangelist Encinitas RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

204. ***Transfer of APN Number 298-113-01-00 - Against the Diocese and Saint James RPSC***

FOUR HUNDRED AND SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2551. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2552. Prior to September 1, 2019, the Diocese acquired Tax Parcel #298-113-01-00 ("298-113-01-00").

2553. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 298-113-01-00 to Saint James RPSC.

2554. Plaintiffs believe and allege that on the date of the transfer of 298-113-01-00, as alleged in ¶2553 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 298-113-01-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2555. Plaintiffs seek to set aside the transfer of 298-113-01-00.

2556. Plaintiffs are entitled to recover from the Diocese and Saint James RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2557. The Diocese and Saint James RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2558. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2551-2557 of the Four Hundred And Seventh Cause of Action.

2559. Plaintiffs believe that when 298-113-01-00 was transferred, as alleged in ¶2553 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for

which it was indebted, and that the transfer of 298-113-01-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2560. Plaintiffs seek to set aside the transfer of 298-113-01-00.

2561. Plaintiffs are entitled to recover from the Diocese and Saint James RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2562. The Diocese and Saint James RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

205. ***Transfer of APN Number 350-482-11-00- Against the Diocese and Mary, Star of the Sea RPSC***

FOUR HUNDRED AND NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2563. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2564. Prior to September 1, 2019, the Diocese acquired Tax Parcel #350-482-11-00 ("350-482-11-00").

2565. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 350-482-11-00 to Mary, Star of the Sea RPSC.

2566. Plaintiffs believe and allege that on the date of the transfer of 350-482-11-00, as alleged in ¶2565 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 350-482-11-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2567. Plaintiffs seek to set aside the transfer of 350-482-11-00.

2568. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2569. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND TENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2570. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2563-2569 of the Four Hundred And Ninth Cause of Action.

2571. Plaintiffs believe that when 350-482-11-00 was transferred, as alleged in ¶2565 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 350-482-11-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2572. Plaintiffs seek to set aside the transfer of 350-482-11-00.

2573. Plaintiffs are entitled to recover from the Diocese and Mary, Star of the Sea RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2574. The Diocese and Mary, Star of the Sea RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

206. Transfer of APN Number 415-552-05-00 - Against the Diocese and Saint Brigid RPSC

FOUR HUNDRED AND ELEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2575. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2576. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 415-552-05-00 ("415-552-05-00").

2577. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 415-552-05-00 to Saint Brigid RPSC.

2578. Plaintiffs believe and allege that on the date of the transfer of 415-552-05-00, as alleged in ¶2577 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 415-552-05-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2579. Plaintiffs seek to set aside the transfer of 415-552-05-00.

2580. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2581. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND TWELFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2582. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2575-2581 of the Four Hundred And Eleventh Cause of Action.

2583. Plaintiffs believe that when 415-552-05-00 was transferred, as alleged in ¶2577 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 415-552-05-00 was made without the

Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2584. Plaintiffs seek to set aside the transfer of 415-552-05-00.

2585. Plaintiffs are entitled to recover from the Diocese and Saint Brigid RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2586. The Diocese and Saint Brigid RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

207. ***Transfer of APN Number 429-010-10-00 - Against the Diocese and Saint Columba RPSC***

FOUR HUNDRED AND THIRTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2587. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2588. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 429-010-10-00 ("429-010-10-00").

2589. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 429-010-10-00 to Saint Columba RPSC.

2590. Plaintiffs believe and allege that on the date of the transfer of 429-010-10-00, as alleged in ¶2589 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 429-010-10-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2591. Plaintiffs seek to set aside the transfer of 429-010-10-00.

2592. Plaintiffs are entitled to recover from the Diocese and Saint Columba RPSC the

full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2593. The Diocese and Saint Columba RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FOURTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2594. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2587-2593 of the Four Hundred And Thirteenth Cause of Action.

2595. Plaintiffs believe that when 429-010-10-00 was transferred, as alleged in ¶2589 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 429-010-10-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2596. Plaintiffs seek to set aside the transfer of 429-010-10-00.

2597. Plaintiffs are entitled to recover from the Diocese and Saint Columba RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2598. The Diocese and Saint Columba RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

208. Transfer of APN Number 453-254-03-00 - Against the Diocese and Saint Patrick San Diego RPSC

FOUR HUNDRED AND FIFTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2599. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

2600. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 453-254-03-00 ("453-254-03-00").

2601. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 453-254-03-00 to Saint Patrick San Diego RPSC.

2602. Plaintiffs believe and allege that on the date of the transfer of 453-254-03-00, as alleged in ¶2601 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 453-254-03-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2603. Plaintiffs seek to set aside the transfer of 453-254-03-00.

2604. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2605. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SIXTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2606. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2599-2605 of the Four Hundred And Fifteenth Cause of Action.

2607. Plaintiffs believe that when 453-254-03-00 was transferred, as alleged in ¶2601 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 453-254-03-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the

time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2608. Plaintiffs seek to set aside the transfer of 453-254-03-00.

2609. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2610. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

209. Transfer of APN Number 453-254-11-00 - Against the Diocese and Saint Patrick San Diego RPSC

FOUR HUNDRED AND SEVENTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2611. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2612. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 453-254-03-11 ("453-254-03-11").

2613. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 453-254-03-11 to Saint Patrick San Diego RPSC.

2614. Plaintiffs believe and allege that on the date of the transfer of 453-254-03-11, as alleged in ¶2613 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 453-254-03-11 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2615. Plaintiffs seek to set aside the transfer of 453-254-03-11.

2616. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese

in the Underlying Actions, including any judgments awarded or entered.

2617. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND EIGHTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2618. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2611-2617 of the Four Hundred And Seventeenth Cause of Action.

2619. Plaintiffs believe that when 453-254-03-11 was transferred, as alleged in ¶2613 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 453-254-03-11 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2620. Plaintiffs seek to set aside the transfer of 453-254-03-11.

2621. Plaintiffs are entitled to recover from the Diocese and Saint Patrick RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2622. The Diocese and Saint Patrick RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

210. Transfer of APN Number 453-254-12-00 - Against the Diocese and Saint Patrick San Diego RPSC

FOUR HUNDRED AND NINETEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2623. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2624. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 453-254-12-00 ("453-254-12-00").

2625. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 453-254-12-00 to Saint Patrick San Diego RPSC.

2626. Plaintiffs believe and allege that on the date of the transfer of 453-254-12-00, as alleged in ¶2625 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 453-254-12-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2627. Plaintiffs seek to set aside the transfer of 453-254-12-00.

2628. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2629. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND TWENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2630. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2623-2629 of the Four Hundred And Nineteenth Cause of Action.

2631. Plaintiffs believe that when 453-254-12-00 was transferred, as alleged in ¶2625 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 453-254-12-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil

Code §3439.05.

2632. Plaintiffs seek to set aside the transfer of 453-254-12-00.

2633. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2634. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

211. Transfer of APN Number 453-421-06-00 - Against the Diocese and Saint Patrick San Diego RPSC

FOUR HUNDRED AND TWENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2635. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2636. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 453-421-06-00 ("453-421-06-00").

2637. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 453-421-06-00 to Saint Patrick San Diego RPSC.

2638. Plaintiffs believe and allege that on the date of the transfer of 453-421-06-00, as alleged in ¶2637 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 453-421-06-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2639. Plaintiffs seek to set aside the transfer of 453-421-06-00.

2640. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2641. The Diocese and Saint Patrick San Diego RSPC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND TWENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2642. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2635-2641 of the Four Hundred And Twenty-First Cause of Action.

2643. Plaintiffs believe that when 453-421-06-00 was transferred, as alleged in ¶2637 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 453-421-06-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2644. Plaintiffs seek to set aside the transfer of 453-421-06-00.

2645. Plaintiffs are entitled to recover from the Diocese and Saint Patrick San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2646. The Diocese and Saint Patrick San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

212. Transfer of APN Number 470-100-18-00 - Against the Diocese and Saint Martin of Tours RPSC

FOUR HUNDRED AND TWENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2647. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2648. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 470-100-18-00

("470-100-18-00")

2649. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 470-100-18-00 to Saint Martin of Tours RPSC.

2650. Plaintiffs believe and allege that on the date of the transfer of 470-100-18-00, as alleged in ¶2649 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 470-100-18-00 Boulevard was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2651. Plaintiffs seek to set aside the transfer of 470-100-18-00.

2652. Plaintiffs are entitled to recover from the Diocese and Saint Martin of Tours RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2653. The Diocese and Saint Martin of Tours RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND TWENTY FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2654. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2647-2653 of the First Cause of Action.

2655. Plaintiffs believe that when 470-100-18-00 was transferred, as alleged in ¶2649 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 470-100-18-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2656. Plaintiffs seek to set aside the transfer of 470-100-18-00.

2657. Plaintiffs are entitled to recover from the Diocese and Saint Martin of Tours RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2658. The Diocese and Saint Martin of Tours RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

213. ***Transfer of APN Number 471-351-23-00 - Against the Diocese and Our Lady of the Sacred Heart RPSC***

FOUR HUNDRED AND TWENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2659. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2660. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 471-351-23-00 ("471-351-23-00").

2661. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 471-351-23-00 to Our Lady of the Sacred Heart RPSC.

2662. Plaintiffs believe and allege that on the date of the transfer of 471-351-23-00, as alleged in ¶2661 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 471-351-23-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2663. Plaintiffs seek to set aside the transfer of 471-351-23-00.

2664. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2665. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein

alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND TWENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2666. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2659-2665 of the Three Hundred And Twenty-Fifth Cause of Action.

2667. Plaintiffs believe that when 471-351-23-00 was transferred, as alleged in ¶2661 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 471-351-23-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2668. Plaintiffs seek to set aside the transfer of 471-351-23-00.

2669. Plaintiffs are entitled to recover from the Diocese and Our Lady of the Sacred Heart RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2670. The Diocese and Our Lady of the Sacred Heart RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

214. Transfer of APN Number 500-182-32-00- Against the Diocese and Santa Sophia RPSC

FOUR HUNDRED AND TWENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2671. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2672. Prior to September 1, 2019, the Diocese acquired Tax Parcel #500-182-32-00 ("500-182-32-00").

2673. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 500-182-32-00 to Santa Sophia RPSC.

2674. Plaintiffs believe and allege that on the date of the transfer of 500-182-32-00, as alleged in ¶2673 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 500-182-32-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2675. Plaintiffs seek to set aside the transfer of 500-182-32-00.

2676. Plaintiffs are entitled to recover from the Diocese and Santa Sophia RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2677. The Diocese and Santa Sophia RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND TWENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2678. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2671-2677 of the Four Hundred And Twenty-Seventh Cause of Action.

2679. Plaintiffs believe that when 500-182-32-00 was transferred, as alleged in ¶2673 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 500-182-32-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2680. Plaintiffs seek to set aside the transfer of 500-182-32-00.

2681. Plaintiffs are entitled to recover from the Diocese and Santa Sophia RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2682. The Diocese and Santa Sophia RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

215. Transfer of APN Number 501-175-18-00- Against the Diocese and Santa Sophia RPSC

FOUR HUNDRED AND TWENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2683. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2684. Prior to September 1, 2019, the Diocese acquired Tax Parcel #501-175-18-00 ("501-175-18-00").

2685. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 501-175-18-00 to Santa Sophia RPSC.

2686. Plaintiffs believe and allege that on the date of the transfer of 501-175-18-00, as alleged in ¶2685 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 501-175-18-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2687. Plaintiffs seek to set aside the transfer of 501-175-18-00.

2688. Plaintiffs are entitled to recover from the Diocese and Santa Sophia RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2689. The Diocese and Santa Sophia RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND THIRTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2690. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2683-2689 of the Four Hundred And Twenty-Ninth Cause of Action.

2691. Plaintiffs believe that when 501-175-18-00 was transferred, as alleged in ¶2658 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 501-175-18-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2692. Plaintiffs seek to set aside the transfer of 501-175-18-00.

2693. Plaintiffs are entitled to recover from the Diocese and Santa Sophia RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2694. The Diocese and Santa Sophia RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

216. ***Transfer of APN Number 531-260-19-00 - Against the Diocese and Saint Agnes RPSC***

FOUR HUNDRED AND THIRTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2695. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2696. Prior to September 1, 2019, the Diocese acquired Tax Parcel #531-260-19-00 ("531-260-19-00").

2697. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese

transferred 531-260-19-00 to Saint Agnes RPSC.

2698. Plaintiffs believe and allege that on the date of the transfer of 531-260-19-00, as alleged in ¶2697 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 531-260-19-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2699. Plaintiffs seek to set aside the transfer of 531-260-19-00.

2700. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2701. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND THIRTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2702. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2695-2701 of the Four Hundred And Thirty-First Cause of Action.

2703. Plaintiffs believe that when 531-260-19-00 was transferred, as alleged in ¶2697 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 531-260-19-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2704. Plaintiffs seek to set aside the transfer of 531-260-19-00.

2705. Plaintiffs are entitled to recover from the Diocese and Saint Agnes RPSC the full

amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2706. The Diocese and Saint Agnes RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

217. ***Transfer of APN Number 535-220-18-00 - Against the Diocese and Our Lady of Angels RPSC***

FOUR HUNDRED AND THIRTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2707. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2708. Prior to September 1, 2019, the Diocese acquired Tax Parcel #535-220-18-00 ("535-220-18-00").

2709. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 535-220-18-00 to Our Lady of Angels RPSC.

2710. Plaintiffs believe and allege that on the date of the transfer of 535-220-18-00, as alleged in ¶2709 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 535-220-18-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2711. Plaintiffs seek to set aside the transfer of 535-220-18-00.

2712. Plaintiffs are entitled to recover from the Diocese and Our Lady of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2713. The Diocese and Our Lady of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND THIRTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2714. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2707-2713 of the Four Hundred And Thirty-Third Cause of Action.

2715. Plaintiffs believe that when 535-220-18-00 was transferred, as alleged in ¶2709 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 535-220-18-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2716. Plaintiffs seek to set aside the transfer of 535-220-18-00.

2717. Plaintiffs are entitled to recover from the Diocese and Our Lady of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2718. The Diocese and Our Lady of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

218. ***Transfer of APN Number 535-220-19-00 - Against the Diocese and Our Lady of Angels RPSC***

FOUR HUNDRED AND THIRTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2719. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2720. Prior to September 1, 2019, the Diocese acquired Tax Parcel #535-220-19-00 ("535-220-19-00").

2721. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 535-220-19-00 to Our Lady of Angels RPSC.

2722. Plaintiffs believe and allege that on the date of the transfer of 535-220-19-00, as alleged in ¶2721 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 535-220-19-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2723. Plaintiffs seek to set aside the transfer of 535-220-19-00.

2724. Plaintiffs are entitled to recover from the Diocese and Our Lady of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2725. The Diocese and Our Lady of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND THIRTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2726. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2719-2725 of the Four Hundred And Thirty-Fifth Cause of Action.

2727. Plaintiffs believe that when 535-220-19-00 was transferred, as alleged in ¶2721 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 535-220-19-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2728. Plaintiffs seek to set aside the transfer of 535-220-19-00.

2729. Plaintiffs are entitled to recover from the Diocese and Our Lady of Angels RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2730. The Diocese and Our Lady of Angels RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

219. ***Transfer of APN Number 538-080-32-00 - Against the Diocese and Our Lady of Guadalupe San Diego RPSC***

FOUR HUNDRED AND THIRTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2731. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 the Preliminary Allegations.

2732. Prior to September 1, 2019, the Diocese acquired Tax Parcel #538-080-32-00 ("538-080-32-00").

2733. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 538-080-32-00 to Our Lady of Guadalupe San Diego RPSC.

2734. Plaintiffs believe and allege that on the date of the transfer of 538-080-32-00, as alleged in ¶2733 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 538-080-32-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2735. Plaintiffs seek to set aside the transfer of 538-080-32-00.

2736. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2737. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein

alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND THIRTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2738. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2731-2737 of the Four Hundred And Thirty-Seventh Cause of Action.

2739. Plaintiffs believe that when 538-080-32-00 was transferred, as alleged in ¶2733 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 538-080-32-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2740. Plaintiffs seek to set aside the transfer of 538-080-32-00.

2741. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2742. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

220. Transfer of APN Number 550-222-27-00 - Against the Diocese and Saint Jude Shrine of the West RPSC

FOUR HUNDRED AND THIRTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2743. Plaintiffs re-allege and incorporate by this reference paragraphs1-34 of the Preliminary Allegations.

2744. Prior to September 1, 2019, the Diocese acquired Tax Parcel #550-222-27-00 ("550-222-27-00").

2745. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 550-222-27-00 to Saint Jude Shrine of the West RPSC.

2746. Plaintiffs believe and allege that on the date of the transfer of 550-222-27-00, as alleged in ¶2745 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 550-222-27-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2747. Plaintiffs seek to set aside the transfer of 550-222-27-00.

2748. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2749. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FORTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2750. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2743-2749 of the Four Hundred And Thirty-Ninth Cause of Action.

2751. Plaintiffs believe that when 550-222-27-00 was transferred, as alleged in ¶2745 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 550-222-27-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2752. Plaintiffs seek to set aside the transfer of 550-222-27-00.

2753. Plaintiffs are entitled to recover from the Diocese and Saint Jude Shrine of the West RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2754. The Diocese and Saint Jude Shrine of the West RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

221. Transfer of APN Number 556-352-17-00 - Against the Diocese and Saint Mary National City RPSC

FOUR HUNDRED AND FORTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2755. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2756. Prior to September 1, 2019, the Diocese acquired Tax Parcel #556-352-17-00 ("556-352-17-00").

2757. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 556-352-17-00 to Saint Mary National City RPSC.

2758. Plaintiffs believe and allege that on the date of the transfer of 556-352-17-00, as alleged in ¶2757 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 556-352-17-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2759. Plaintiffs seek to set aside the transfer of 556-352-17-00.

2760. Plaintiffs are entitled to recover from the Diocese and Saint Mary National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2761. The Diocese and Saint Mary National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FORTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2762. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2755-2761 of the Four Hundred And Forty-First Cause of Action.

2763. Plaintiffs believe that when 556-352-17-00 was transferred, as alleged in ¶2757 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 556-352-17-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2764. Plaintiffs seek to set aside the transfer of 556-352-17-00.

2765. Plaintiffs are entitled to recover from the Diocese and Saint Mary National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2766. The Diocese and Saint Mary National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

222. Transfer of APN Number 568-512-37-00 - Against the Diocese and Saint Rose of Lima RPSC

FOUR HUNDRED AND FORTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2767. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2768. Prior to September 1, 2019, the Diocese acquired Tax Parcel #568-512-37-00 ("568-512-37-00").

2769. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese

transferred 568-512-37-00 to Saint Rose of Lima RPSC.

2770. Plaintiffs believe and allege that on the date of the transfer of 568-512-37-00, as alleged in ¶2769 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 568-512-37-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2771. Plaintiffs seek to set aside the transfer of 568-512-37-00.

2772. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2773. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FORTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2774. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 27667-2773 of the Four Hundred And Forty-Third Cause of Action.

2775. Plaintiffs believe that when 568-512-37-00 was transferred, as alleged in ¶2769 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 568-512-37-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2776. Plaintiffs seek to set aside the transfer of 568-512-37-00.

2777. Plaintiffs are entitled to recover from the Diocese and Saint Rose of Lima RPSC

the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2778. The Diocese and Saint Rose of Lima RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

223. *Transfer of APN Number 627-202-01-00 - Against the Diocese and Saint Charles RPSC*

FOUR HUNDRED AND FORTY FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2779. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2780. Prior to September 1, 2019, the Diocese acquired Tax Parcel #627-202-01-00 ("627-202-01-00").

2781. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 627-202-01-00 to Saint Charles RPSC.

2782. Plaintiffs believe and allege that on the date of the transfer of 627-202-01-00, as alleged in ¶2781 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 627-202-01-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2783. Plaintiffs seek to set aside the transfer of 627-202-01-00.

2784. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2785. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FORTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2786. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2779-2785 of the Four Hundred And Forty-Fifth Cause of Action.

2787. Plaintiffs believe that when 627-202-01-00 was transferred, as alleged in ¶2781 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 627-202-01-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2788. Plaintiffs seek to set aside the transfer of 627-202-01-00.

2789. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2790. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

224. ***Transfer of APN Number 627-202-02-00 - Against the Diocese and Saint Charles RPSC***

FOUR HUNDRED AND FORTY SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2791. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2792. Prior to September 1, 2019, the Diocese acquired Tax Parcel #627-202-02-00 ("627-202-02-00").

2793. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 627-202-02-00 to Saint Charles RPSC.

2794. Plaintiffs believe and allege that on the date of the transfer of 627-202-02-00, as alleged in ¶2793 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 627-202-02-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2795. Plaintiffs seek to set aside the transfer of 627-202-02-00.

2796. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2797. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FORTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2798. Plaintiff re-allege and incorporate by this reference paragraphs 1- 34 of the Preliminary Allegations and 2791-2797 of the Four Hundred And Forty-Seventh Cause of Action.

2799. Plaintiffs believe that when 627-202-02-00 was transferred, as alleged in ¶2793 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 627-202-02-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2800. Plaintiffs seek to set aside the transfer of 627-202-02-00.

2801. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the

Underlying Actions, including any judgments awarded or entered.

2802. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

225. ***Transfer of APN Number 627-302-20-00 - Against the Diocese and Saint Charles RPSC***

FOUR HUNDRED AND FORTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2803. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2804. Prior to September 1, 2019, the Diocese acquired Tax Parcel #627-302-20-00 ("627-302-20-00").

2805. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 627-302-20-00 to Saint Charles RPSC.

2806. Plaintiffs believe and allege that on the date of the transfer of 627-302-20-00, as alleged in ¶2805 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 627-302-20-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2807. Plaintiffs seek to set aside the transfer of 627-302-20-00.

2808. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2809. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FIFTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2810. Plaintiff re-allege and incorporate by this reference paragraphs 1- 34 of the Preliminary Allegations and 2803-2809 of the Four Hundred And Forty-Ninth Cause of Action.

2811. Plaintiffs believe that when 627-302-20-00 was transferred, as alleged in ¶2805 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 627-302-20-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2812. Plaintiffs seek to set aside the transfer of 627-302-20-00.

2813. Plaintiffs are entitled to recover from the Diocese and Saint Charles RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2814. The Diocese and Saint Charles RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

226. ***Transfer of APN Number 058-438-007-00 - Against the Diocese and Our Lady of Guadalupe Calexico RPSC***

FOUR HUNDRED AND FIFTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2815. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2816. Prior to September 1, 2019, the Diocese acquired Tax Parcel #058-438-007-00 ("058-438-007-00").

2817. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 058-438-007-00 to Our Lady of Guadalupe Calexico RPSC.

2818. Plaintiffs believe and allege that on the date of the transfer of 058-438-007-00, as alleged in ¶2817 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 058-438-007-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2819. Plaintiffs seek to set aside the transfer of 058-438-007-00.

2820. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2821. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FIFTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2822. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2815-2821 of the Four Hundred And Fifty-First Cause of Action.

2823. Plaintiffs believe that when 058-438-007-00 was transferred, as alleged in ¶2817 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 058-438-007-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2824. Plaintiffs seek to set aside the transfer of 058-438-007-00.

2825. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the

Diocese in the Underlying Actions, including any judgments awarded or entered.

2826. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

227. ***Transfer of APN Number 058-438-008-00 - Against the Diocese and Our Lady of Guadalupe Calexico RPSC***

FOUR HUNDRED AND FIFTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2827. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2828. Prior to September 1, 2019, the Diocese acquired Tax Parcel #058-438-008-00 ("058-438-008-00").

2829. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 058-438-008-00 to Our Lady of Guadalupe Calexico RPSC.

2830. Plaintiffs believe and allege that on the date of the transfer of 058-438-008-00, as alleged in ¶2829 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 058-438-008-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2831. Plaintiffs seek to set aside the transfer of 058-438-008-00.

2832. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2833. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FIFTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2834. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2827-2833 of the Four Hundred And Fifty-Third Cause of Action.

2835. Plaintiffs believe that when 058-438-008-00 was transferred, as alleged in ¶2829 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 058-438-008-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2836. Plaintiffs seek to set aside the transfer of 058-438-008-00.

2837. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2838. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

228. ***Transfer of APN Number 058-441-012-00 - Against the Diocese and Our Lady of Guadalupe Calexico RPSC***

FOUR HUNDRED AND FIFTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2839. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2840. Prior to September 1, 2019, the Diocese acquired Tax Parcel #058-441-012-00 ("058-441-012-00").

2841. By Grant Deed recorded December 13, 2019 for no consideration, the Diocese

transferred 058-441-012-00 to Our Lady of Guadalupe Calexico RPSC.

2842. Plaintiffs believe and allege that on the date of the transfer of 058-441-012-00, as alleged in ¶2841 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 058-441-012-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2843. Plaintiffs seek to set aside the transfer of 058-441-012-00.

2844. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2845. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FIFTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2846. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and2839-2845 of the Four Hundred And Fifty-Fifth Cause of Action.

2847. Plaintiffs believe that when 058-441-012-00 was transferred, as alleged in ¶2841 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 058-441-012-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2848. Plaintiffs seek to set aside the transfer of 058-441-012-00.

2849. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe

Calexico RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2850. The Diocese and Our Lady of Guadalupe Calexico RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

229. ***Transfer of APN Number 054-352-029-00 - Against the Diocese and Our Lady of Guadalupe El Centro RPSC***

FOUR HUNDRED AND FIFTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2851. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2852. Prior to September 1, 2019, the Diocese acquired Tax Parcel #054-352-029-00 ("054-352-029-00").

2853. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 054-352-029-00 to Our Lady of Guadalupe El Centro RPSC.

2854. Plaintiffs believe and allege that on the date of the transfer of 054-352-029-00, as alleged in ¶2853 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 054-352-029-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2855. Plaintiffs seek to set aside the transfer of 054-352-029-00.

2856. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe El Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2857. The Diocese and Our Lady of Guadalupe El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND FIFTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2858. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2851-2857 of the Four Hundred And Fifty-Seventh Cause of Action.

2859. Plaintiffs believe that when 054-352-029-00 was transferred, as alleged in ¶2853 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 054-352-029-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2860. Plaintiffs seek to set aside the transfer of 054-352-029-00.

2861. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe El Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2862. The Diocese and Our Lady of Guadalupe El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

230. Transfer of APN Number 051-215-001-00 - Against the Diocese and Saint Mary El Centro RPSC

FOUR HUNDRED AND FIFTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2863. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2864. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT MARY CATHOLIC PARISH EL CENTRO IN EL CENTRO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Mary El Centro RPSC") is a

California religious corporation.

2865. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 051-215-001-00 ("051-215-001-00").

2866. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 051-215-001-00 to Saint Mary El Centro RPSC.

2867. Plaintiffs believe and allege that on the date of the transfer of 051-215-001-00, as alleged in ¶2866 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 051-215-001-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2868. Plaintiffs seek to set aside the transfer of 051-215-001-00.

2869. Plaintiffs are entitled to recover from the Diocese and Saint Mary El Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2870. The Diocese and Saint Mary El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SIXTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2871. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2863-2870 of the Four Hundred And Fifty-Ninth Cause of Action.

2872. Plaintiffs believe that when 051-215-001-00 was transferred, as alleged in ¶2866 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 051-215-001-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the

time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2873. Plaintiffs seek to set aside the transfer of 051-215-001-00.

2874. Plaintiffs are entitled to recover from the Diocese and Saint Mary El Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2875. The Diocese and Saint Mary El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

231. Transfer of APN Number 051-420-033-00 - Against the Diocese and Saint Mary El Centro RPSC

FOUR HUNDRED AND SIXTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2876. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2877. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 051-420-033-00 ("051-420-033-00").

2878. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 051-420-033-00 to Saint Mary El Centro RPSC.

2879. Plaintiffs believe and allege that on the date of the transfer of 051-420-033-00, as alleged in ¶2878 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 051-420-033-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2880. Plaintiffs seek to set aside the transfer of 051-420-033-00.

2881. Plaintiffs are entitled to recover from the Diocese and Saint Mary El Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese

in the Underlying Actions, including any judgments awarded or entered.

2882. The Diocese and Saint Mary El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SIXTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2883. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2876-2882 of the Four Hundred And Sixty-First Cause of Action.

2884. Plaintiffs believe that when 051-420-033-00 was transferred, as alleged in ¶2878 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 051-420-033-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2885. Plaintiffs seek to set aside the transfer of 051-420-033-00.

2886. Plaintiffs are entitled to recover from the Diocese and Saint Mary El Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2887. The Diocese and Saint Mary El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

232. Transfer of APN Number 021-132-008-00 - Against the Diocese and Saint Patrick Calipatria RPSC

FOUR HUNDRED AND SIXTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2888. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2889. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 021-132-008-00 ("021-132-008-00").

2890. By Grant Deed recorded February 3, 2020 for no consideration, the Diocese transferred 021-132-008-00 to Saint Patrick Calipatria RPSC.

2891. Plaintiffs believe and allege that on the date of the transfer of 021-132-008-00, as alleged in ¶2890 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 021-132-008-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2892. Plaintiffs seek to set aside the transfer of 021-132-008-00.

2893. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2894. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SIXTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2895. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2888-2894 of the Four Hundred And Sixty-Third Cause of Action.

2896. Plaintiffs believe that when 021-132-008-00 was transferred, as alleged in ¶2890 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 021-132-008-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil

Code §3439.05.

2897. Plaintiffs seek to set aside the transfer of 021-132-008-00.

2898. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2899. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

233. Transfer of APN Number 021-132-009-00 - Against the Diocese and Saint Patrick Calipatria RPSC

FOUR HUNDRED AND SIXTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2900. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2901. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 021-132-009-00 ("021-132-009-00").

2902. By Grant Deed recorded February 3, 2020, for no consideration, the Diocese transferred 021-132-009-00 to Saint Patrick Calipatria RPSC.

2903. Plaintiffs believe and allege that on the date of the transfer of 021-132-009-00, as alleged in ¶2902 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 021-132-009-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2904. Plaintiffs seek to set aside the transfer of 021-132-009-00.

2905. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2906. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SIXTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2907. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2900-2906 of the Four Hundred And Sixty-Fifth Cause of Action.

2908. Plaintiffs believe that when 021-132-009-00 was transferred, as alleged in ¶2902 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 021-132-009-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2909. Plaintiffs seek to set aside the transfer of 021-132-009-00.

2910. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2911. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

234. Transfer of APN Number 021-132-010-00 - Against the Diocese and Saint Patrick Calipatria RPSC

FOUR HUNDRED AND SIXTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2912. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2913. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 021-132-010-00

("021-132-010-00").

2914. By Grant Deed recorded February 3, 2020, for no consideration, the Diocese transferred 021-132-010-00 to Saint Patrick Calipatria RPSC.

2915. Plaintiffs believe and allege that on the date of the transfer of 021-132-010-00, as alleged in ¶2914 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 021-132-010-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2916. Plaintiffs seek to set aside the transfer of 021-132-010-00.

2917. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2918. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SIXTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2919. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2912-2918 of the Four Hundred And Sixty-Seventh Cause of Action.

2920. Plaintiffs believe that when 021-132-010-00 was transferred, as alleged in ¶2914 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 021-132-010-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2921. Plaintiffs seek to set aside the transfer of 021-132-010-00.

2922. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2923. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

235. Transfer of APN Number 023-103-006-00 - Against the Diocese and Saint Patrick Calipatria RPSC

FOUR HUNDRED AND SIXTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2924. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2925. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 023-103-006-00 ("023-103-006-00").

2926. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese transferred 023-103-006-00 to Saint Patrick Calipatria RPSC.

2927. Plaintiffs believe and allege that on the date of the transfer of 023-103-006-00, as alleged in ¶2926 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-103-006-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2928. Plaintiffs seek to set aside the transfer of 023-103-006-00.

2929. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2930. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SEVENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2931. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2924-2930 of the Four Hundred And Sixty-Ninth Cause of Action.

2932. Plaintiffs believe that when 023-103-006-00 was transferred, as alleged in ¶2926 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-103-006-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2933. Plaintiffs seek to set aside the transfer of 023-103-006-00.

2934. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2935. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

236. Transfer of APN Number 023-412-002-00 - Against the Diocese and Saint Patrick Calipatria RPSC

FOUR HUNDRED AND SEVENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2936. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2937. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 023-412-002-00 ("023-412-002-00").

2938. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese transferred 023-412-002-00 to Saint Patrick Calipatria RPSC.

2939. Plaintiffs believe and allege that on the date of the transfer of 023-412-002-00, as alleged in ¶2938 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-412-002-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2940. Plaintiffs seek to set aside the transfer of 023-412-002-00.

2941. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2942. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SEVENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2943. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2936-2937 of the Four Hundred And Seventy-First Cause of Action.

2944. Plaintiffs believe that when 023-412-002-00 was transferred, as alleged in ¶2938 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-412-002-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2945. Plaintiffs seek to set aside the transfer of 023-412-002-00.

2946. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2947. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

237. Transfer of APN Number 023-412-003-00 - Against the Diocese and Saint Patrick Calipatria RPSC

FOUR HUNDRED AND SEVENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2948. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2949. Prior to September 1, 2019, the Diocese acquired Tax Parcel # 023-412-003-00 ("023-412-003-00").

2950. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese transferred 023-412-003-00 to Saint Patrick Calipatria RPSC.

2951. Plaintiffs believe and allege that on the date of the transfer of 023-412-003-00, as alleged in ¶2950 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-412-003-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2952. Plaintiffs seek to set aside the transfer of 023-412-003-00.

2953. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2954. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SEVENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2955. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2948-2954 of the Four Hundred And Seventy-Third Cause of Action.

2956. Plaintiffs believe that when 023-412-003-00 was transferred, as alleged in ¶2950 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-412-003-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2957. Plaintiffs seek to set aside the transfer of 023-412-003-00.

2958. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2959. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

238. Transfer of APN Number 023-412-004-00 - Against the Diocese and Saint Patrick Calipatria RPSC

FOUR HUNDRED AND SEVENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2960. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2961. Prior to September 1, 2019, the Diocese acquired Tax Parcel #023-412-004-00 ("023-412-004-00").

2962. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese

transferred 023-412-004-00 to Saint Patrick Caliptria RPSC.

2963. Plaintiffs believe and allege that on the date of the transfer of 023-412-004-00, as alleged in ¶2962 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-412-004-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2964. Plaintiffs seek to set aside the transfer of 023-412-004-00.

2965. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2966. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SEVENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2967. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2960-2966 of the Four Hundred And Seventy-Fifth Cause of Action.

2968. Plaintiffs believe that when 023-412-004-00 was transferred, as alleged in ¶2962 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-412-004-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2969. Plaintiffs seek to set aside the transfer of 023-412-004-00.

2970. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria

RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2971. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

239. Transfer of APN Number 023-412-016-00 - Against the Diocese and Saint Patrick Calipatria RPSC

FOUR HUNDRED AND SEVENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2972. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2973. Prior to September 1, 2019, the Diocese acquired Tax Parcel #023-412-016-00 ("023-412-016-00").

2974. By Grant Deed recorded November 19, 2019 for no consideration, the Diocese transferred 023-412-016-00 to Saint Patrick Calipatria RPSC.

2975. Plaintiffs believe and allege that on the date of the transfer of 023-412-016-00, as alleged in ¶2974 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-412-016-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2976. Plaintiffs seek to set aside the transfer of 023-412-016-00.

2977. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2978. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND SEVENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2979. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2972-2978 of the Four Hundred And Seventy-Seventh Cause of Action.

2980. Plaintiffs believe that when 023-412-016-00 was transferred, as alleged in ¶2974 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 023-412-016-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

2981. Plaintiffs seek to set aside the transfer of 023-412-016-00.

2982. Plaintiffs are entitled to recover from the Diocese and Saint Patrick Calipatria RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2983. The Diocese and Saint Patrick Calipatria RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

240. Transfer of APN Number 105-641-02-00 - Against the Diocese and Saint Peter the Apostle RPSC

FOUR HUNDRED AND SEVENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2984. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2985. Plaintiffs are informed and believe and thereupon allege that SAINT PETER THE APOSTLE CATHOLIC PARISH IN FALLBROOK, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Peter the Apostle RPSC") is a California religious corporation.

2986. Prior to September 1, 2019, the Diocese acquired Tax Parcel #105-641-02-00 ("105-641-02-00").

2987. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 105-641-02-00 to Saint Peter the Apostle RPSC.

2988. Plaintiffs believe and allege that on the date of the transfer of 105-641-02-00, as alleged in ¶2987 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 105-641-02-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

2989. Plaintiffs seek to set aside the transfer of 105-641-02-00.

2990. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2991. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND EIGHTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

2992. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2984-2991 of the Four Hundred And Seventy-Ninth Cause of Action.

2993. Plaintiffs believe that when 105-641-02-00 was transferred, as alleged in ¶2987 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 105-641-02-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil

Code §3439.05.

2994. Plaintiffs seek to set aside the transfer of 105-641-02-00.

2995. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

2996. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

241. Transfer of 450 South Stage Coach Lane APN# 105-641-15-00 - Against the Diocese and Saint Peter the Apostle RPSC

FOUR HUNDRED AND EIGHTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

2997. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

2998. Prior to September 1, 2019, the Diocese acquired real property at 450 South Stage Coach Lane, Fallbrook 92028; APN #105-641-15-00 ("105-641-15-00").

2999. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 105-641-15-00 to Saint Peter the Apostle RPSC.

3000. Plaintiffs believe and allege that on the date of the transfer of 105-641-15-00, as alleged in ¶2999 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 105-641-15-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3001. Plaintiffs seek to set aside the transfer of 105-641-15-00.

3002. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3003. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND EIGHTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3004. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 2997-3003 of the Four Hundred And Eighty-First Cause of Action.

3005. Plaintiffs believe that when 105-641-15-00 was transferred, as alleged in ¶2999 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 105-641-15-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3006. Plaintiffs seek to set aside the transfer of 105-641-15-00.

3007. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3008. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

242. Transfer of 450 South Stage Coach Lane APN# 105-641-19-00 - Against the Diocese and Saint Peter the Apostle RPSC

FOUR HUNDRED AND EIGHTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3009. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3010. Prior to September 1, 2019, the Diocese acquired real property at 450 South Stage

Coach Lane, Fallbrook 92028; APN #105-641-19-00 ("105-641-19-00").

3011. By Grant Deed recorded September 25, 2019 for no consideration, the Diocese transferred 105-641-19-00 to Saint Peter the Apostle RPSC.

3012. Plaintiffs believe and allege that on the date of the transfer of 105-641-19-00, as alleged in ¶3011 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 105-641-19-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3013. Plaintiffs seek to set aside the transfer of 105-641-19-00.

3014. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3015. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND EIGHTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3016. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3009-3015 of the Four Hundred And Eighty-Third Cause of Action.

3017. Plaintiffs believe that when 105-641-19-00 was transferred, as alleged in ¶2011 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 105-641-19-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3018. Plaintiffs seek to set aside the transfer of 105-641-19-00.

3019. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3020. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

243. Transfer of 1839 Wilson Ave, APN# 559-102-07-00 - Against the Diocese and Saint Anthony of Padua National City RPSC

FOUR HUNDRED AND EIGHTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3021. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3022. Prior to September 1, 2019, the Diocese acquired the real property 1839 Wilson Ave, National City 91950. APN# 559-102-07-00 ("559-102-07-00").

3023. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 559-102-07-00 to Saint Anthony of Padua National City RPSC.

3024. Plaintiffs believe and allege that on the date of the transfer of 559-102-07-00, as alleged in ¶3023 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 559-102-07-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3025. Plaintiffs seek to set aside the transfer of 559-102-07-00.

3026. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or

entered.

3027. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND EIGHTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3028. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3021-3027 of the Four Hundred And Eighty-Fifth Cause of Action.

3029. Plaintiffs believe that when 559-102-07-00 was transferred, as alleged in ¶3023 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 559-102-07-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3030. Plaintiffs seek to set aside the transfer of 559-102-07-00.

3031. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3032. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

244. ***Transfer of 1839 Wilson Ave, APN# 559-102-08-00 - Against the Diocese and Saint Anthony of Padua National City RPSC***

FOUR HUNDRED AND EIGHTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3033. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3034. Prior to September 1, 2019, the Diocese acquired the real property 1839 Wilson Ave, National City 91950. APN# 559-102-08-00 ("559-102-08-00").

3035. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 559-102-08-00 to Saint Anthony of Padua National City RPSC.

3036. Plaintiffs believe and allege that on the date of the transfer of 559-102-08-00, as alleged in ¶3035 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 559-102-08-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3037. Plaintiffs seek to set aside the transfer of 559-102-08-00.

3038. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3039. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND EIGHTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3040. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3033-3039 of the Four Hundred And Eighty-Seventh Cause of Action.

3041. Plaintiffs believe that when 559-102-08-00 was transferred, as alleged in ¶3035

above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 559-102-08-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3042. Plaintiffs seek to set aside the transfer of 559-102-08-00.

3043. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3044. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

245. ***Transfer of 559-102-06-00 - Against the Diocese and Saint Anthony of Padua National City RPSC***

FOUR HUNDRED AND EIGHTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3045. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3046. Prior to September 1, 2019, the Diocese acquired the Tax Parcel # 559-102-06-00 ("559-102-06-00").

3047. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 559-102-06-00 to Saint Anthony of Padua National City RPSC.

3048. Plaintiffs believe and allege that on the date of the transfer of 559-102-06-00, as alleged in ¶3047 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 559-102-06-00 was made with

the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3049. Plaintiffs seek to set aside the transfer of 559-102-06-00.

3050. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3051. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND NINETIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3052. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3045-3051 of the Four Hundred And Eighty-Ninth Cause of Action.

3053. Plaintiffs believe that when 559-102-06-00 was transferred, as alleged in ¶3047 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 559-102-06-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3054. Plaintiffs seek to set aside the transfer of 559-102-06-00.

3055. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3056. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

246. *Transfer of 656-040-47-00 - Against the Diocese and Saint Adelaide of Burgundy RPSC*

FOUR HUNDRED AND NINETY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3057. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3058. Plaintiffs are informed and believe and thereupon allege that SAINT ADELAIDE OF BURGUNDY CATHOLIC PARISH IN CAMPO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Adelaide of Burgundy RPSC") is a California religious corporation.

3059. Prior to September 1, 2019, the Diocese acquired the Tax Parcel # 656-040-47-00 ("656-040-47-00").

3060. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 656-040-47-00 to Saint Adelaide of Burgundy RPSC.

3061. Plaintiffs believe and allege that on the date of the transfer of 656-040-47-00, as alleged in ¶3060 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 656-040-47-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3062. Plaintiffs seek to set aside the transfer of 656-040-47-00.

3063. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3064. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND NINETY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3065. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3057-3064 of the Four Hundred And Ninety-First Cause of Action.

3066. Plaintiffs believe that when 656-040-47-00 was transferred, as alleged in ¶3060 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 656-040-47-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3067. Plaintiffs seek to set aside the transfer of 656-040-47-00.

3068. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3069. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

247. ***Transfer of 655-114-04-00 - Against the Diocese and Saint Adelaide of Burgundy RPSC***

FOUR HUNDRED AND NINETY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3070. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3071. Prior to September 1, 2019, the Diocese acquired the Tax Parcel # 655-114-04-00 ("655-114-04-00").

3072. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 655-114-04-00 to Saint Adelaide of Burgundy RPSC.

3073. Plaintiffs believe and allege that on the date of the transfer of 655-114-04-00, as alleged in ¶3072 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 656-040-47-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3074. Plaintiffs seek to set aside the transfer of 655-114-04-00.

3075. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3076. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND NINETY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3077. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3070-3076 of the Four Hundred And Ninety-Third Cause of Action.

3078. Plaintiffs believe that when 655-114-04-00 was transferred, as alleged in ¶3072 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 655-114-04-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3079. Plaintiffs seek to set aside the transfer of 655-114-04-00.

3080. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3081. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

248. ***Transfer of APN Number 660-190-29-00 - Against the Diocese and Saint Adelaide of Burgundy RPSC***

FOUR HUNDRED AND NINETY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3082. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3083. Prior to September 1, 2019, the Diocese acquired the Tax Parcel # 660-190-29-00 ("660-190-29-00").

3084. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 660-190-29-00 to Saint Adelaide of Burgundy RPSC.

3085. Plaintiffs believe and allege that on the date of the transfer of 660-190-29-00, as alleged in ¶3084 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 660-190-29-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3086. Plaintiffs seek to set aside the transfer of 660-190-29-00.

3087. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3088. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND NINETY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3089. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3082-3088 of the Four Hundred And Ninety-Fifth Cause of Action.

3090. Plaintiffs believe that when 660-190-29-00 was transferred, as alleged in ¶3084 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 660-190-29-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3091. Plaintiffs seek to set aside the transfer of 660-190-29-00.

3092. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3093. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

249. ***Transfer of APN Number 660-190-30-00 - Against the Diocese and Saint Adelaide of Burgundy RPSC***

FOUR HUNDRED AND NINETY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3094. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3095. Prior to September 1, 2019, the Diocese acquired the Tax Parcel # 660-190-30-00

("660-190-30-00").

3096. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 660-190-30-00 to Saint Adelaide of Burgundy RPSC.

3097. Plaintiffs believe and allege that on the date of the transfer of 660-190-30-00, as alleged in ¶3096 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 660-190-30-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3098. Plaintiffs seek to set aside the transfer of 660-190-30-00.

3099. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3100. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FOUR HUNDRED AND NINETY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3101. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3094-3100 of the Four Hundred And Ninety-Seventh Cause of Action.

3102. Plaintiffs believe that when 660-190-30-00 was transferred, as alleged in ¶3096 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 660-190-30-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3103. Plaintiffs seek to set aside the transfer of 660-190-30-00.

3104. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3105. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

250. ***Transfer of APN Number 045-271-027-00 - Against the Diocese and Saint Joseph Holtville RPSC***

FOUR HUNDRED AND NINETY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3106. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3107. Plaintiffs are informed and believe and thereupon allege that SAINT JOSEPH CATHOLIC PARISH HOLTVILLE IN HOLTVILLE, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Joseph Holtville RPSC") is a California religious corporation.

3108. Prior to September 1, 2019, the Diocese acquired the Tax Parcel # 045-271-027-00 ("045-271-027-00").

3109. By Grant Deed recorded September 26, 2019 for no consideration, the Diocese transferred 045-271-027-00 to Saint Joseph Holtville RPSC.

3110. Plaintiffs believe and allege that on the date of the transfer of 045-271-027-00, as alleged in ¶3109 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 045-271-027-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3111. Plaintiffs seek to set aside the transfer of 045-271-027-00.

3112. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Holtville RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3113. The Diocese and Saint Joseph Holtville RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDREDTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3114. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3106-3113 of the Four Hundred And Ninety-Ninth Cause of Action.

3115. Plaintiffs believe that when 045-271-027-00 was transferred, as alleged in ¶3109 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 045-271-027-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3116. Plaintiffs seek to set aside the transfer of 045-271-027-00.

3117. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Holtville RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3118. The Diocese and Saint Joseph Holtville RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

251. Transfer of 404 South Stage Coach Lane - Against the Diocese and Saint Peter the Apostle RPSC

FIVE HUNDRED AND FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3119. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3120. Prior to September 1, 2019, the Diocese acquired real property at 404 South Stage Coach Lane, Fallbrook 92028 ("404 South Stage Coach Lane").

3121. By Grant Deed recorded September 25, 2019 for no consideration, the Diocese transferred 404 South Stage Coach Lane to Saint Peter the Apostle RPSC.

3122. Plaintiffs believe and allege that on the date of the transfer of 404 South Stage Coach Lane, as alleged in ¶3121 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 404 South Stage Coach Lane was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3123. Plaintiffs seek to set aside the transfer of 404 South Stage Coach Lane.

3124. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3125. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3126. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3119-3125 of the Five Hundred And First Cause of Action.

3127. Plaintiffs believe that when 404 South Stage Coach Lane was transferred, as alleged in ¶3121 above, creditors, including Plaintiffs, had outstanding claims against the

Diocese, for which it was indebted, and that the transfer of 404 South Stage Coach Lane was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3128. Plaintiffs seek to set aside the transfer of 404 South Stage Coach Lane.

3129. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3130. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

252. Transfer of 1720 Saint Peters Drive - Against the Diocese and Saint Peter the Apostle RPSC

FIVE HUNDRED AND THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3131. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3132. Prior to September 1, 2019, the Diocese acquired real property at 1720 Saint Peters Drive Fallbrook, 92028 ("1720 Saint Peters Drive").

3133. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 1720 Saint Peters Drive to Saint Peter the Apostle RPSC.

3134. Plaintiffs believe and allege that on the date of the transfer of 1720 Saint Peters Drive, as alleged in ¶3133 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1720 Saint Peters Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3135. Plaintiffs seek to set aside the transfer of 1720 Saint Peters Drive.

3136. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3137. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3138. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3131-3137 of the Five Hundred And Third Cause of Action.

3139. Plaintiffs believe that when 1720 Saint Peters Drive was transferred, as alleged in ¶3133 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1720 Saint Peters Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3140. Plaintiffs seek to set aside the transfer of 1720 Saint Peters Drive.

3141. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3142. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

253. Transfer of 1733 East Fallbrook Street - Against the Diocese and Saint Peter the Apostle RPSC

FIVE HUNDRED AND FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3143. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

3144. Prior to September 1, 2019, the Diocese acquired real property at 1733 East Fallbrook Street Fallbrook, 92028 ("1733 East Fallbrook Street").

3145. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 1733 East Fallbrook Street to Saint Peter the Apostle RPSC.

3146. Plaintiffs believe and allege that on the date of the transfer of 1733 East Fallbrook Street, as alleged in ¶3145 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1733 East Fallbrook Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3147. Plaintiffs seek to set aside the transfer of 1733 East Fallbrook Street.

3148. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3149. The Diocese and Saint Peter the Apostle did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3150. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3143-3149 of the Five Hundred And Fifth Cause of Action

3151. Plaintiffs believe that when 1733 East Fallbrook Street was transferred, as alleged in ¶3145 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1733 East Fallbrook Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the

transfer, in violation of Civil Code §3439.05.

3152. Plaintiffs seek to set aside the transfer of 1733 East Fallbrook Street.

3153. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3154. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

254. Transfer of 1728 Saint Peters Drive - Against the Diocese and Saint Peter the Apostle RPSC

FIVE HUNDRED AND SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3155. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3156. Prior to September 1, 2019, the Diocese acquired real property at 1728 Saint Peters Drive Fallbrook, 92028 ("1728 Saint Peters Drive").

3157. By Grant Deed recorded September 24, 2019 for no consideration, the Diocese transferred 1728 Saint Peters Drive to Saint Peter the Apostle RPSC.

3158. Plaintiffs believe and allege that on the date of the transfer of 1728 Saint Peters Drive, as alleged in ¶3157 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1728 Saint Peters Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3159. Plaintiffs seek to set aside the transfer of 1728 Saint Peters Drive.

3160. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3161. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3162. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3155-3161 of the Five Hundred And Seventh Cause of Action.

3163. Plaintiffs believe that when 1728 Saint Peters Drive was transferred, as alleged in ¶3157 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1728 Saint Peters Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3164. Plaintiffs seek to set aside the transfer of 1728 Saint Peters Drive.

3165. Plaintiffs are entitled to recover from the Diocese and Saint Peter the Apostle RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3166. The Diocese and Saint Peter the Apostle RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

255. Transfer of 30902 Rebecca Lane - Against the Diocese and Saint Stephen RPSC

FIVE HUNDRED AND NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3167. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3168. Prior to September 1, 2019, the Diocese acquired real property at 30902 Rebecca

Lane, Valley Center 92082 ("30902 Rebecca Lane").

3169. By Grant Deed recorded December 10, 2019 for no consideration, the Diocese transferred 30902 Rebecca Lane to Saint Stephen RPSC.

3170. Plaintiffs believe and allege that on the date of the transfer of 30902 Rebecca Lane, as alleged in ¶3169 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 30902 Rebecca Lane was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3171. Plaintiffs seek to set aside the transfer of 30902 Rebecca Lane.

3172. Plaintiffs are entitled to recover from the Diocese and Saint Stephen RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3173. The Diocese and Saint Stephen RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND TENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3174. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3167-3173 of the Five Hundred And Ninth Cause of Action.

3175. Plaintiffs believe that when 30902 Rebecca Lane was transferred, as alleged in ¶3169 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 30902 Rebecca Lane was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3176. Plaintiffs seek to set aside the transfer of 30902 Rebecca Lane.

3177. Plaintiffs are entitled to recover from the Diocese and Saint Stephen RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3178. The Diocese and Saint Stephen RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

256. Transfer of 4080 Mission Avenue - Against the Diocese and San Luis Rey RPSC

FIVE HUNDRED AND ELEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3179. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3180. Plaintiffs are informed and believe and thereupon allege that MISSION SAN LUIS REY CATHOLIC PARISH IN OCEANSIDE, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("San Luis Rey RPSC") is a California religious corporation.

3181. Prior to September 1, 2019, the Diocese acquired the real property at 4080 Mission Avenue, Oceanside 92057 ("4080 Mission Avenue").

3182. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4080 Mission Avenue to San Luis Rey RPSC.

3183. Plaintiffs believe and allege that on the date of the transfer of 4080 Mission Avenue, as alleged in ¶3182 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4080 Mission Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3184. Plaintiffs seek to set aside the transfer of 4080 Mission Avenue.

3185. Plaintiffs are entitled to recover from the Diocese and San Luis Rey RPSC the full

amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3186. The Diocese and San Luis Rey RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND TWELFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3187. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3179-3186 of the Five Hundred And Eleventh Cause of Action.

3188. Plaintiffs believe that when 4080 Mission Avenue was transferred, as alleged in ¶3182 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4080 Mission Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3189. Plaintiffs seek to set aside the transfer of 4080 Mission Avenue.

3190. Plaintiffs are entitled to recover from the Diocese and San Luis Rey RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3191. The Diocese and San Luis Rey RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

257. Transfer of 4070 Mission Avenue - Against the Diocese and San Luis Rey RPSC

FIVE HUNDRED AND THIRTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3192. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

3193. Prior to September 1, 2019, the Diocese acquired the real property at 4070 Mission Avenue, Oceanside 92057 ("4070 Mission Avenue").

3194. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 4070 Mission Avenue to San Luis Rey RPSC.

3195. Plaintiffs believe and allege that on the date of the transfer of 4070 Mission Avenue, as alleged in ¶3194 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4070 Mission Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3196. Plaintiffs seek to set aside the transfer of 4070 Mission Avenue.

3197. Plaintiffs are entitled to recover from the Diocese and San Luis Rey RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3198. The Diocese and San Luis Rey RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FOURTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3199. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3192-3198 of the Five Hundred And Thirteenth Cause of Action.

3200. Plaintiffs believe that when 4070 Mission Avenue was transferred, as alleged in ¶3194 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 4070 Mission Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either

insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3201. Plaintiffs seek to set aside the transfer of 4070 Mission Avenue.

3202. Plaintiffs are entitled to recover from the Diocese and San Luis Rey RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3203. The Diocese and San Luis Rey RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

258. Transfer of 1450 Melrose Drive - Against the Diocese and Saint Thomas More RPSC

FIVE HUNDRED AND FIFTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3204. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3205. Plaintiffs are informed and believe and thereupon allege that SAINT THOMAS MORE CATHOLIC PARISH IN OCEANSIDE, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Thomas More RPSC") is a California religious corporation.

3206. Prior to September 1, 2019, the Diocese acquired the real property at 1450 Melrose Drive Oceanside 92057 ("1450 Melrose Drive").

3207. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 1450 Melrose Drive to Saint Thomas More RPSC.

3208. Plaintiffs believe and allege that on the date of the transfer of 1450 Melrose Drive, as alleged in ¶3207 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1450 Melrose Drive was made with the actual intent to hinder, delay, or defraud the creditors of the

Diocese in violation of Civil Code §3439.04(a)(1).

3209. Plaintiffs seek to set aside the transfer of 1450 Melrose Drive.

3210. Plaintiffs are entitled to recover from the Diocese and Saint Thomas More RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3211. The Diocese and Saint Thomas More RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SIXTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3212. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3204-3211 of the Five Hundred And Fifteenth Cause of Action.

3213. Plaintiffs believe that when 1450 Melrose Drive was transferred, as alleged in ¶3207 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1450 Melrose Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3214. Plaintiffs seek to set aside the transfer of 1450 Melrose Drive.

3215. Plaintiffs are entitled to recover from the Diocese and Saint Thomas More RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3216. The Diocese and Saint Thomas More RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

259. Transfer of 14740 Budwin Lane - Against the Diocese and Saint Gabriel RPSC

FIVE HUNDRED AND SEVENTEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3217. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3218. Plaintiffs are informed and believe and thereupon allege that SAINT GABRIEL CATHOLIC PARISH IN POWAY, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Gabriel RPSC") is a California religious corporation.

3219. Prior to September 1, 2019, the Diocese acquired the real property at 14740 Budwin Lane Poway 92064 ("14740 Budwin Lane").

3220. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 14740 Budwin Lane to Saint Gabriel RPSC.

3221. Plaintiffs believe and allege that on the date of the transfer of 14740 Budwin Lane, as alleged in ¶3220 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 14740 Budwin Lane was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3222. Plaintiffs seek to set aside the transfer of 14740 Budwin Lane.

3223. Plaintiffs are entitled to recover from the Diocese and Saint Gabriel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3224. The Diocese and Saint Gabriel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND EIGHTEENTH CAUSE OF ACTION

3225. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3217-3224 of the Five Hundred And Seventeenth Cause of

Action.

3226. Plaintiffs believe that when 14740 Budwin Lane was transferred, as alleged in ¶3220 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 14740 Budwin Lane was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3227. Plaintiffs seek to set aside the transfer of 14740 Budwin Lane.

3228. Plaintiffs are entitled to recover from the Diocese and Saint Gabriel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3229. The Diocese and Saint Gabriel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

260. Transfer of 14726 Budwin Lane - Against the Diocese and Saint Gabriel RPSC

FIVE HUNDRED AND NINETEENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3230. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3231. Prior to September 1, 2019, the Diocese acquired the real property at 14726 Budwin Lane Poway 92064 Budwin Lane ("14726 Budwin Lane").

3232. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 14726 Budwin Lane to Saint Gabriel RPSC.

3233. Plaintiffs believe and allege that on the date of the transfer 14726 Budwin Lane, as alleged in ¶3232 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 14726 Budwin Lane was

made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3234. Plaintiffs seek to set aside the transfer of 14726 Budwin Lane.

3235. Plaintiffs are entitled to recover from the Diocese and Saint Gabriel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3236. The Diocese and Saint Gabriel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND TWENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3237. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3230-3236 of the Five Hundred And Nineteenth Cause of Action.

3238. Plaintiffs believe that when 14726 Budwin Lane was transferred, as alleged in ¶3232 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer 14726 Budwin Lane was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3239. Plaintiffs seek to set aside the transfer of 14726 Budwin Lane.

3240. Plaintiffs are entitled to recover from the Diocese and Saint Gabriel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3241. The Diocese and Saint Gabriel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

261. Transfer of 13734 Twin Peaks Road - Against the Diocese and Saint Gabriel RPSC

FIVE HUNDRED AND TWENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3242. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3243. Prior to September 1, 2019, the Diocese acquired the real property at 13734 Twin Peaks Road Poway 92064 ("13734 Twin Peaks Road").

3244. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 13734 Twin Peaks Road to Saint Gabriel RPSC.

3245. Plaintiffs believe and allege that on the date of the transfer of 13734 Twin Peaks Road, as alleged in ¶3244 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13734 Twin Peaks Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3246. Plaintiffs seek to set aside the transfer of 13734 Twin Peaks Road.

3247. Plaintiffs are entitled to recover from the Diocese and Saint Gabriel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3248. The Diocese and Saint Gabriel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND TWENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3249. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3242-3248 of the Five Hundred And Twenty-First Cause of Action.

3250. Plaintiffs believe that when 13734 Twin Peaks Road was transferred, as alleged in ¶3244 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 13734 Twin Peaks Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3251. Plaintiffs seek to set aside the transfer of 13734 Twin Peaks Road.

3252. Plaintiffs are entitled to recover from the Diocese and Saint Gabriel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3253. The Diocese and Saint Gabriel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

262. ***Transfer of 1812 Wilson Avenue - Against the Diocese and Saint Anthony of Padua National City RPSC***

FIVE HUNDRED AND TWENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3254. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3255. Prior to September 1, 2019, the Diocese acquired real property at 1812 Wilson Avenue National City 91950 ("1812 Wilson Avenue").

3256. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 1812 Wilson Avenue to Saint Anthony of Padua National City RPSC.

3257. Plaintiffs believe and allege that on the date of the transfer of 1812 Wilson Avenue, as alleged in ¶3256 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1812 Wilson

Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3258. Plaintiffs seek to set aside the transfer of 1812 Wilson Avenue.

3259. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3260. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND TWENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3261. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3254-3260 of the Five Hundred And Twenty-Third Cause of Action.

3262. Plaintiffs believe that when 1812 Wilson Avenue was transferred, as alleged in ¶3256 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1812 Wilson Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3263. Plaintiffs seek to set aside the transfer of 1812 Wilson Avenue.

3264. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3265. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

263. *Transfer of 1821 Wilson Avenue - Against the Diocese and Saint Anthony of Padua National City RPSC*

FIVE HUNDRED AND TWENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3266. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3267. Prior to September 1, 2019, the Diocese acquired real property at 1821 Wilson Avenue National City 91950 ("1821 Wilson Avenue").

3268. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 1821 Wilson Avenue to Saint Anthony of Padua National City RPSC.

3269. Plaintiffs believe and allege that on the date of the transfer of 1821 Wilson Avenue, as alleged in ¶3268 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1821 Wilson Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3270. Plaintiffs seek to set aside the transfer of 1821 Wilson Avenue.

3271. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3272. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND TWENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3273. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3266-3272 of the Five Hundred And Twenty-Fifth Cause of Action.

3274. Plaintiffs believe that when 1821 Wilson Avenue was transferred, as alleged in ¶3268 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1821 Wilson Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3275. Plaintiffs seek to set aside the transfer of 1821 Wilson Avenue.

3276. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3277. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

264. ***Transfer of 421 West 19th Street - Against the Diocese and Saint Anthony of Padua RPSC***

FIVE HUNDRED AND TWENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3278. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3279. Prior to September 1, 2019, the Diocese acquired real property at 421 West 19th Street, National City 91950 ("421 West 19th Street").

3280. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese

transferred 421 West 19th Street to Saint Anthony of Padua National City RPSC.

3281. Plaintiffs believe and allege that on the date of the transfer of 421 West 19th Street, as alleged in ¶3280 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 421 West 19th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3282. Plaintiffs seek to set aside the transfer of 421 West 19th Street.

3283. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3284. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND TWENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3285. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3278-3284 of the Five Hundred And Twenty-Seventh Cause of Action.

3286. Plaintiffs believe that when 421 West 19th Street was transferred, as alleged in ¶3280 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 421 West 19th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3287. Plaintiffs seek to set aside the transfer of 421 West 19th Street.

3288. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3289. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

265. ***Transfer of 2837 J Avenue - Against the Diocese and Saint Anthony of Padua National City RPSC***

FIVE HUNDRED AND TWENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3290. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3291. Prior to September 1, 2019, the Diocese acquired real property at 2837 J Avenue, National City 91950 ("2837 J Avenue").

3292. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 2837 J Avenue to Saint Anthony of Padua National City RPSC.

3293. Plaintiffs believe and allege that on the date of the transfer of 2837 J Avenue, as alleged in ¶3292 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2837 J Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3294. Plaintiffs seek to set aside the transfer of 2837 J Avenue.

3295. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or

entered.

3296. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND THIRTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3297. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3290-3296 of the Five Hundred And Twenty-Ninth Cause of Action.

3298. Plaintiffs believe that when 2837 J Avenue was transferred, as alleged in ¶3292 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2837 J Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3299. Plaintiffs seek to set aside the transfer of 2837 J Avenue.

3300. Plaintiffs are entitled to recover from the Diocese and Saint Anthony of Padua National City RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3301. The Diocese and Saint Anthony of Padua National City RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

266. Transfer of 1571 Magdalena Ave - Against the Diocese and Mater Dei RPSC

FIVE HUNDRED AND THIRTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3302. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the

Preliminary Allegations.

3303. Plaintiffs are informed and believe and thereupon allege that Defendant MATER DEI CATHOLIC PARISH IN CHULA VISTA, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Mater Dei RPSC") is a California religious corporation.

3304. Prior to September 1, 2019, the Diocese acquired real property at 1571 Magdalena Ave, Chula Vista 91913 ("1571 Magdalena Ave").

3305. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1571 Magdalena Ave to Mater Dei RPSC.

3306. Plaintiffs believe and allege that on the date of the transfer of 1571 Magdalena Ave, as alleged in ¶3305 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1571 Magdalena Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3307. Plaintiffs seek to set aside the transfer of 1571 Magdalena Ave.

3308. Plaintiffs are entitled to recover from the Diocese and Mater Dei RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3309. The Diocese and Mater Dei RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND THIRTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3310. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3302-3309 of the Five Hundred And Thirty-First Cause of Action.

3311. Plaintiffs believe that when 1571 Magdalena Ave was transferred, as alleged in

¶3305 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1571 Magdalena Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3312. Plaintiffs seek to set aside the transfer of 1571 Magdalena Ave.

3313. Plaintiffs are entitled to recover from the Diocese and Mater Dei RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3314. The Diocese and Mater Dei RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

267. Transfer of 1543 Hunters Pointe Ave - Against the Diocese and Mater Dei RPSC

FIVE HUNDRED AND THIRTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3315. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3316. Prior to September 1, 2019, the Diocese acquired real property at 1543 Hunters Pointe Ave, Chula Vista 91913 ("1543 Hunters Pointe Ave").

3317. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1543 Hunters Pointe Ave to Mater Dei RPSC.

3318. Plaintiffs believe and allege that on the date of the transfer of 1543 Hunters Pointe Ave, as alleged in ¶3317 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1543 Hunters Pointe Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3319. Plaintiffs seek to set aside the transfer of 1543 Hunters Pointe Ave.

3320. Plaintiffs are entitled to recover from the Diocese and Mater Dei RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3321. The Diocese and Mater Dei RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND THIRTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3322. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3315-3321 of the Five Hundred And Thirty-Third Cause of Action.

3323. Plaintiffs believe that when 1543 Hunters Pointe Ave was transferred, as alleged in ¶3317 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1543 Hunters Pointe Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3324. Plaintiffs seek to set aside the transfer of 1543 Hunters Pointe Ave.

3325. Plaintiffs are entitled to recover from the Diocese and Mater Dei RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3326. The Diocese and Mater Dei RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

268. ***Transfer of 1347 Dewey Place - Against the Diocese and Saint Adelaide of Burgundy RPSC***

FIVE HUNDRED AND THIRTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3327. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3328. Prior to September 1, 2019, the Diocese acquired real property at 1347 Dewey Place, Campo 91906 ("1347 Dewey Place").

3329. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 1347 Dewey Place to Saint Adelaide of Burgundy RPSC.

3330. Plaintiffs believe and allege that on the date of the transfer of 1347 Dewey Place, as alleged in ¶3329 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1347 Dewey Place was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3331. Plaintiffs seek to set aside the transfer of 1347 Dewey Place.

3332. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3333. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND THIRTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3334. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3327-3333 of the Five Hundred And Thirty-Fifth Cause of Action.

3335. Plaintiffs believe that when 1347 Dewey Place was transferred, as alleged in

¶3329 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1347 Dewey Place was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3336. Plaintiffs seek to set aside the transfer of 1347 Dewey Place.

3337. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3338. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

269. ***Transfer of 1021 Sheridan Road - Against the Diocese and Saint Adelaide of Burgundy RPSC***

FIVE HUNDRED AND THIRTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3339. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3340. Prior to September 1, 2019, the Diocese acquired real property at 1021 Sheridan Road, Campo 91906 ("1021 Sheridan Road").

3341. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 1021 Sheridan Road to Saint Adelaide of Burgundy RPSC.

3342. Plaintiffs believe and allege that on the date of the transfer of 1021 Sheridan Road, as alleged in ¶3341 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1021 Sheridan Road was made with the actual intent to hinder, delay, or defraud the creditors of the

Diocese in violation of Civil Code §3439.04(a)(1).

3343. Plaintiffs seek to set aside the transfer of 1021 Sheridan Road.

3344. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3345. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND THIRTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3346. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3339-3345 of the Five Hundred And Thirty-Seventh Cause of Action.

3347. Plaintiffs believe that when 1021 Sheridan Road was transferred, as alleged in ¶3341 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1021 Sheridan Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3348. Plaintiffs seek to set aside the transfer of 1021 Sheridan Road.

3349. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3350. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

270. ***Transfer of 44690 Calexico Ave - Against the Diocese and Saint Adelaide of Burgundy RPSC***

FIVE HUNDRED AND THIRTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3351. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3352. Prior to September 1, 2019, the Diocese acquired real property at 44690 Calexico Ave, Jacumba 91934 ("44690 Calexico Ave").

3353. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 44690 Calexico Ave to Saint Adelaide of Burgundy RPSC.

3354. Plaintiffs believe and allege that on the date of the transfer of 44690 Calexico Ave, as alleged in ¶3353 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 44690 Calexico Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3355. Plaintiffs seek to set aside the transfer of 44690 Calexico Ave.

3356. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3357. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FORTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3358. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3351-3357 of the Five Hundred And Thirty-Ninth Cause of

Action.

3359. Plaintiffs believe that when 44690 Calexico Ave was transferred, as alleged in ¶3353 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 44690 Calexico Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3360. Plaintiffs seek to set aside the transfer of 44690 Calexico Ave.

3361. Plaintiffs are entitled to recover from the Diocese and Saint Adelaide of Burgundy RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3362. The Diocese and Saint Adelaide of Burgundy RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

271. ***Transfer of 3179 Governor Drive - Against the Diocese and Our Mother of Confidence RPSC***

FIVE HUNDRED AND FORTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3363. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3364. Plaintiffs are informed and believe and thereupon allege that Defendant OUR MOTHER OF CONFIDENCE CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Mother of Confidence RPSC") is a California religious corporation.

3365. Prior to September 1, 2019, the Diocese acquired real property at 3179 Governor Drive, San Diego 92122 ("3179 Governor Drive").

3366. By Grant Deed recorded December 9, 2019 for no consideration, the Diocese transferred 3179 Governor Drive to Our Mother of Confidence RPSC.

3367. Plaintiffs believe and allege that on the date of the transfer of 3179 Governor Drive, as alleged in ¶3366 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3179 Governor Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3368. Plaintiffs seek to set aside the transfer of 3179 Governor Drive.

3369. Plaintiffs are entitled to recover from the Diocese and Our Mother of Confidence RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3370. The Diocese and Our Mother of Confidence RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FORTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3371. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3363-3370 of the Five Hundred And Forty-First Cause of Action.

3372. Plaintiffs believe that when 3179 Governor Drive was transferred, as alleged in ¶3366 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3179 Governor Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3373. Plaintiffs seek to set aside the transfer of 3179 Governor Drive.

3374. Plaintiffs are entitled to recover from the Diocese and Our Mother of Confidence RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3375. The Diocese and Our Mother of Confidence RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

272. *Transfer of 3131 Governor Drive - Against the Diocese and Our Mother of Confidence RPSC*

FIVE HUNDRED AND FORTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3376. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3377. Prior to September 1, 2019, the Diocese acquired real property at 3131 Governor Drive, San Diego 92122 ("3131 Governor Drive").

3378. By Grant Deed recorded December 9, 2019 for no consideration, the Diocese transferred 3131 Governor Drive to Our Mother of Confidence RPSC.

3379. Plaintiffs believe and allege that on the date of the transfer of 3131 Governor Drive, as alleged in ¶3378 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3131 Governor Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3380. Plaintiffs seek to set aside the transfer of 3131 Governor Drive.

3381. Plaintiffs are entitled to recover from the Diocese and Our Mother of Confidence RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3382. The Diocese and Our Mother of Confidence RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FORTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3383. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3376-3382 of the Five Hundred And Forty-Third Cause of Action.

3384. Plaintiffs believe that when 3131 Governor Drive was transferred, as alleged in ¶3378 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 3131 Governor Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3385. Plaintiffs seek to set aside the transfer of 3131 Governor Drive.

3386. Plaintiffs are entitled to recover from the Diocese and Our Mother of Confidence RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3387. The Diocese and Our Mother of Confidence RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

273. Transfer of 6036 Camino Rico - Against the Diocese and Saint Therese RPSC

FIVE HUNDRED AND FORTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3388. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3389. Plaintiffs are informed and believe and thereupon allege that SAINT THERESE CATHOLIC PARISH IN SAN DIEGO, CALIFORNIA REAL PROPERTY SUPPORT

CORPORATION ("Saint Therese RPSC") is a California religious corporation.

3390. Prior to September 1, 2019, the Diocese acquired the real property at 6036 Camino Rico, San Diego 92130 ("6036 Camino Rico").

3391. By Grant Deed recorded September 25, 2019 for no consideration, the Diocese transferred 6036 Camino Rico to Saint Therese RPSC.

3392. Plaintiffs believe and allege that on the date of the transfer of 6036 Camino Rico, as alleged in ¶3391 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6036 Camino Rico was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3393. Plaintiffs seek to set aside the transfer of 6036 Camino Rico.

3394. Plaintiffs are entitled to recover from the Diocese and Saint Therese RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3395. The Diocese and Saint Therese RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FORTY-SIXTH CAUSE OF ACTION

3396. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3388-3395 of the Five Hundred And Forty-Fifth Cause of Action.

3397. Plaintiffs believe that when 6036 Camino Rico was transferred, as alleged in ¶3391 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 6036 Camino Rico was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil

Code §3439.05.

3398. Plaintiffs seek to set aside the transfer of 6036 Camino Rico.

3399. Plaintiffs are entitled to recover from the Diocese and Saint Therese RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3400. The Diocese and Saint Therese RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

274. Transfer of 5815 Navajo Road - Against the Diocese and Saint Therese RPSC

FIVE HUNDRED AND FORTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3401. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3402. Prior to September 1, 2019, the Diocese acquired the real property 5815 Navajo Road, San Diego 92130 ("5815 Navajo Road").

3403. By Grant Deed recorded December 26, 2019 for no consideration, the Diocese transferred 5815 Navajo Road to Saint Therese RPSC.

3404. Plaintiffs believe and allege that on the date of the transfer of 5815 Navajo Road, as alleged in ¶3403 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5815 Navajo Road was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3405. Plaintiffs seek to set aside the transfer of 5815 Navajo Road.

3406. Plaintiffs are entitled to recover from the Diocese and Saint Therese RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3407. The Diocese and Saint Therese RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FORTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3408. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3401-3407 of the Five Hundred And Forty-Seventh Cause of Action.

3409. Plaintiffs believe that when 5815 Navajo Road was transferred, as alleged in ¶3403 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 5815 Navajo Road was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3410. Plaintiffs seek to set aside the transfer of 5815 Navajo Road.

3411. Plaintiffs are entitled to recover from the Diocese and Saint Therese RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3412. The Diocese and Saint Therese RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

275. ***Transfer of 157 E 6th Street - Against the Diocese and Saint Joseph Westmorland RPSC***

FIVE HUNDRED AND FORTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3413. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3414. Prior to September 1, 2019, the Diocese acquired real property at 157 E 6th Street,

Westmorland 92281 ("157 E 6th Street").

3415. By Grant Deed recorded September 26, 2019 for no consideration, the Diocese transferred 157 E 6th Street to Saint Joseph Westmorland RPSC.

3416. Plaintiffs believe and allege that on the date of the transfer of 157 E 6th Street, as alleged in ¶3415 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 157 E 6th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3417. Plaintiffs seek to set aside the transfer of 157 E 6th Street.

3418. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Westmorland RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3419. The Diocese and Saint Joseph Westmorland RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FIFTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3420. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3413-3419 of the Five Hundred And Forty-Ninth Cause of Action.

3421. Plaintiffs believe that when 157 E 6th Street was transferred, as alleged in ¶3415 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 157 E 6th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3422. Plaintiffs seek to set aside the transfer of 157 E 6th Street.

3423. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Westmorland RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3424. The Diocese and Saint Joseph Westmorland RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

276. ***Transfer of 147 E 6th Street - Against the Diocese and Saint Joseph Westmorland RPSC***

FIVE HUNDRED AND FIFTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3425. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3426. Prior to September 1, 2019, the Diocese acquired real property at 147 E 6th Street, Westmorland 92281 ("147 E 6th Street").

3427. By Grant Deed recorded September 26, 2019 for no consideration, the Diocese transferred 147 E 6th Street to Saint Joseph Westmorland RPSC.

3428. Plaintiffs believe and allege that on the date of the transfer of 147 E 6th Street, as alleged in ¶3427 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 147 E 6th Street was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3429. Plaintiffs seek to set aside the transfer of 147 E 6th Street.

3430. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Westmoreland RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3431. The Diocese and Saint Joseph Westmorland RPSC did the things herein alleged

maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FIFTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3432. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3425-3431 of the Five Hundred And Fifty-First Cause of Action.

3433. Plaintiffs believe that when 147 E 6th Street was transferred, as alleged in ¶3427 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 147 E 6th Street was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3434. Plaintiffs seek to set aside the transfer of 147 E 6th Street.

3435. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Westmorland RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3436. The Diocese and Saint Joseph Westmorland RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

277. ***Transfer of 578 Maple Ave - Against the Diocese and Saint Joseph Holtville RPSC***

FIVE HUNDRED AND FIFTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3437. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3438. Prior to September 1, 2019, the Diocese acquired real property at 578 Maple Ave, Holtville 92250 ("578 Maple Ave").

3439. By Grant Deed recorded September 26, 2019 for no consideration, the Diocese transferred 578 Maple Ave to Saint Joseph Holtville RPSC.

3440. Plaintiffs believe and allege that on the date of the transfer of 578 Maple Ave, as alleged in ¶3439 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 578 Maple Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3441. Plaintiffs seek to set aside the transfer of 578 Maple Ave.

3442. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Holtville RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3443. The Diocese and Saint Joseph Holtville RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FIFTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3444. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3437-3443 of the Five Hundred And Fifty-Third Cause of Action.

3445. Plaintiffs believe that when 578 Maple Ave was transferred, as alleged in ¶3439 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 578 Maple Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3446. Plaintiffs seek to set aside the transfer of 578 Maple Ave.

3447. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Holtville RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3448. The Diocese and Saint Joseph Holtville RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

278. *Transfer of 560 Maple Ave - Against the Diocese and Saint Joseph Holtville RPSC*

FIVE HUNDRED AND FIFTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3449. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3450. Prior to September 1, 2019, the Diocese acquired real property at 560 Maple Ave, Holtville 92250 ("560 Maple Ave").

3451. By Grant Deed recorded September 26, 2019 for no consideration, the Diocese transferred 560 Maple Ave to Saint Joseph Holtville RPSC.

3452. Plaintiffs believe and allege that on the date of the transfer of 560 Maple Ave, as alleged in ¶3451 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 560 Maple Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3453. Plaintiffs seek to set aside the transfer of 560 Maple Ave.

3454. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Holtville RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3455. The Diocese and Saint Joseph Holtville RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FIFTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3456. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3449-3455 of the Five Hundred And Fifty-Fifth Cause of Action.

3457. Plaintiffs believe that when 560 Maple Ave was transferred, as alleged in ¶3451 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 560 Maple Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3458. Plaintiffs seek to set aside the transfer of 560 Maple Ave.

3459. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Holtville RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3460. The Diocese and Saint Joseph Holtville RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

279. ***Transfer of 566 Maple Ave - Against the Diocese and Saint Joseph Holtville RPSC***

FIVE HUNDRED AND FIFTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3461. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3462. Prior to September 1, 2019, the Diocese acquired real property at 566 Maple Ave, Holtville 92250 ("566 Maple Ave").

3463. By Grant Deed recorded September 26, 2019 for no consideration, the Diocese

transferred 566 Maple Ave to Saint Joseph Holtville RPSC.

3464. Plaintiffs believe and allege that on the date of the transfer of 566 Maple Ave, as alleged in ¶3463 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 566 Maple Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3465. Plaintiffs seek to set aside the transfer of 566 Maple Ave.

3466. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Holtville RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3467. The Diocese and Saint Joseph Holtville RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND FIFTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3468. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3461-3467 of the Five Hundred And Fifty-Seventh Cause of Action.

3469. Plaintiffs believe that when 566 Maple Ave was transferred, as alleged in ¶3463 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 566 Maple Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3470. Plaintiffs seek to set aside the transfer of 566 Maple Ave.

3471. Plaintiffs are entitled to recover from the Diocese and Saint Joseph Holtville

RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3472. The Diocese and Saint Joseph Holtville RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

280. ***Transfer of 2020-22 Alaquinas Drive - Against the Diocese and Our Lady of Mount Carmel San Ysidro RPSC***

FIVE HUNDRED AND FIFTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3473. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3474. Plaintiffs are informed and believe and thereupon allege that OUR LADY OF MT. CARMEL CATHOLIC PARISH SAN YSIDRO IN SAN YSIDRO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Our Lady of Mount Carmel San Ysidro RPSC") is a California religious corporation.

3475. Prior to September 1, 2019, the Diocese acquired the real property at 2020-22 Alaquinas Drive, San Ysidro 92173 ("2020-22 Alaquinas Drive").

3476. By Grant Deed recorded December 9, 2019 for no consideration, the Diocese transferred 2020-22 Alaquinas Drive to Our Lady of Mount Carmel San Ysidro RPSC.

3477. Plaintiffs believe and allege that on the date of the transfer of 2020-22 Alaquinas Drive, as alleged in ¶3476 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2020-22 Alaquinas Drive was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3478. Plaintiffs seek to set aside the transfer of 2020-22 Alaquinas Drive.

3479. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel

San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3480. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SIXTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3481. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3473-3480 of the Five Hundred And Fifty-Ninth Cause of Action.

3482. Plaintiffs believe that when 2020-22 Alaquinas Drive was transferred, as alleged in ¶3476 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 2020-22 Alaquinas Drive was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3483. Plaintiffs seek to set aside the transfer of 2020-22 Alaquinas Drive.

3484. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3485. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

281. ***Transfer of 322 West Park Ave - Against the Diocese and Our Lady of Mount Carmel San Ysidro RPSC***

FIVE HUNDRED AND SIXTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3486. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3487. Prior to September 1, 2019, the Diocese acquired the real property at 322 West Park Ave, San Ysidro 92173 ("322 West Park Ave").

3488. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 322 West Park Ave to Our Lady of Mount Carmel San Ysidro RPSC.

3489. Plaintiffs believe and allege that on the date of the transfer of 322 West Park Ave, as alleged in ¶3488 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 322 West Park Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3490. Plaintiffs seek to set aside the transfer of 322 West Park Ave.

3491. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3492. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SIXTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3493. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3486-3492 of the Five Hundred And Sixty-First Cause of Action.

3494. Plaintiffs believe that when 322 West Park Ave was transferred, as alleged in ¶3488 above, creditors, including Plaintiffs, had outstanding claims against the Diocese,

for which it was indebted, and that the transfer of 322 West Park Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3495. Plaintiffs seek to set aside the transfer of 322 West Park Ave.

3496. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3497. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

282. ***Transfer of 316-18 West Park Ave - Against the Diocese and Our Lady of Mount Carmel San Ysidro RPSC***

FIVE HUNDRED AND SIXTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3498. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3499. Prior to September 1, 2019, the Diocese acquired the real property at 316-18 West Park Ave, San Ysidro 92173 ("316-18 West Park Ave").

3500. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 316-18 West Park Ave to Our Lady of Mount Carmel San Ysidro RPSC.

3501. Plaintiffs believe and allege that on the date of the transfer of 316-18 West Park Ave, as alleged in ¶3500 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 316-18 West Park Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3502. Plaintiffs seek to set aside the transfer of 316-18 West Park Ave.

3503. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3504. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SIXTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3505. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3498-3504 of the Five Hundred And Sixty-Third Cause of Action.

3506. Plaintiffs believe that when 316-18 West Park Ave was transferred, as alleged in ¶3500 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 316-18 West Park Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3507. Plaintiffs seek to set aside the transfer of 316-18 West Park Ave.

3508. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3509. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

283. ***Transfer of 308-14 West Park Ave - Against the Diocese and Our Lady of Mount Carmel San Ysidro RPSC***

FIVE HUNDRED AND SIXTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3510. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3511. Prior to September 1, 2019, the Diocese acquired the real property at 308-14 West Park Ave, San Ysidro 92173 ("308-14 West Park Ave").

3512. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 308-14 West Park Ave to Our Lady of Mount Carmel San Ysidro RPSC.

3513. Plaintiffs believe and allege that on the date of the transfer of 308-14 West Park Ave, as alleged in ¶3512 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 308-14 West Park Ave was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3514. Plaintiffs seek to set aside the transfer of 308-14 West Park Ave.

3515. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3516. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SIXTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3517. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3510-3516 of the Five Hundred And Sixty-Fifth Cause of Action.

3518. Plaintiffs believe that when 308-14 West Park Ave was transferred, as alleged in

¶3512 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 308-14 West Park Ave was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3519. Plaintiffs seek to set aside the transfer of 308-14 West Park Ave.

3520. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3521. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

284. Transfer of APN #307-040-75-00 - Against the Diocese and Saint Therese of Carmel RPSC

FIVE HUNDRED AND SIXTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3522. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3523. Prior to September 1, 2019, the Diocese acquired APN # 307-040-75-00 ("307-040-75-00").

3524. By Grant Deed recorded September 16, 2019 for no consideration, the Diocese transferred 307-040-75-00 to Saint Therese of Carmel RPSC.

3525. Plaintiffs believe and allege that on the date of the transfer of 307-040-75-00, as alleged in ¶3524 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 307-040-75-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3526. Plaintiffs seek to set aside the transfer of 307-040-75-00.

3527. Plaintiffs are entitled to recover from the Diocese and Saint Therese of Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3528. The Diocese and Saint Therese of Carmel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SIXTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3529. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3522-3528 of the Five Hundred And Sixty-Seventh Cause of Action.

3530. Plaintiffs believe that when 307-040-75-00 was transferred, as alleged in ¶3524 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 307-040-75-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3531. Plaintiffs seek to set aside the transfer of 307-040-75-00.

3532. Plaintiffs are entitled to recover from the Diocese and Saint Therese of Carmel RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3533. The Diocese and Saint Therese of Carmel RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

285. ***Transfer of 4141 Beyer Boulevard, APN #638-140-45-00 - Against the Diocese and Our Lady of Mount Carmel San Ysidro RPSC***

FIVE HUNDRED AND SIXTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3534. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3535. Prior to September 1, 2019, the Diocese acquired the real property at 4141 Beyer Boulevard, San Ysidro 92173 APN #638-140-45-00 ("638-140-45-00").

3536. By Grant Deed recorded September 13, 2019 for no consideration, the Diocese transferred 638-140-45-00 to Our Lady of Mount Carmel San Ysidro RPSC.

3537. Plaintiffs believe and allege that on the date of the transfer of 638-140-45-00, as alleged in ¶3536 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 638-140-45-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3538. Plaintiffs seek to set aside the transfer of 638-140-45-00.

3539. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3540. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SEVENTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3541. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3534-3540 of the Five Hundred And Sixty-Ninth Cause of Action.

3542. Plaintiffs believe that when 638-140-45-00 was transferred, as alleged in ¶3536

above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 638-140-45-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3543. Plaintiffs seek to set aside the transfer of 638-140-45-00.

3544. Plaintiffs are entitled to recover from the Diocese and Our Lady of Mount Carmel San Ysidro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3545. The Diocese and Our Lady of Mount Carmel San Ysidro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

286. ***Transfer of 13208 Lakeshore Drive (APN 395-190-46-00) - Against the Diocese and Our Lady of Perpetual Help RPSC***

FIVE HUNDRED AND SEVENTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3546. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3547. Prior to September 1, 2019, the Diocese acquired the real property at 13208 Lakeshore Drive, Lakeside 92040 APN # 395-190-41-00 ("395-190-41-00").

3548. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 395-190-41-00 to Our Lady of Perpetual Help RPSC.

3549. Plaintiffs believe and allege that on the date of the transfer of 395-190-41-00, as alleged in ¶3548 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 395-190-41-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of

Civil Code §3439.04(a)(1).

3550. Plaintiffs seek to set aside the transfer of 395-190-41-00.

3551. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3552. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SEVENTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3553. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3546-3552 of the Five Hundred And Seventy-First Cause of Action.

3554. Plaintiffs believe that when 395-190-41-00 was transferred, as alleged in ¶3546 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 395-190-41-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3555. Plaintiffs seek to set aside the transfer of 395-190-41-00.

3556. Plaintiffs are entitled to recover from the Diocese and Our Lady of Perpetual Help RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3557. The Diocese and Our Lady of Perpetual Help RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

287. Transfer of 211 E 11th Avenue - Against the Diocese and Saint Mary Escondido RPSC

FIVE HUNDRED AND SEVENTY-THIRD CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3558. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3559. Prior to September 1, 2019, the Diocese acquired real property at 211 E 11th Avenue, Escondido 92025, ("211 E 11th Avenue").

3560. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 211 E 11th Avenue to Saint Mary Escondido RPSC.

3561. Plaintiffs believe and allege that on the date of the transfer of 211 E 11th Avenue, as alleged in ¶3560 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 211 E 11th Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3562. Plaintiffs seek to set aside the transfer of 211 E 11th Avenue.

3563. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3564. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SEVENTY-FOURTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3565. Plaintiff re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3558-3564 of the Five Hundred And Seventy-Third Cause of Action.

3566. Plaintiffs believe that when 211 E 11th Avenue was transferred, as alleged in

¶3560 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 211 E 11th Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3567. Plaintiffs seek to set aside the transfer of 211 E 11th Avenue.

3568. Plaintiffs are entitled to recover from the Diocese and Saint Mary Escondido RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3569. The Diocese and Saint Mary Escondido RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

288. ***Transfer of 1726 Kearney Avenue - Against the Diocese and Our Lady of Guadalupe San Diego RPSC***

FIVE HUNDRED AND SEVENTY-FIFTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3570. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3571. Prior to September 1, 2019, the Diocese acquired the real property at 1726 Kearney Avenue, San Diego 92113 ("1726 Kearney Avenue").

3572. By Grant Deed recorded September 18, 2019 for no consideration, the Diocese transferred 1726 Kearney Avenue to Our Lady of Guadalupe San Diego RPSC.

3573. Plaintiffs believe and allege that on the date of the transfer of 1726 Kearney Avenue, as alleged in ¶3572 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1726 Kearney Avenue was made with the actual intent to hinder, delay, or defraud the creditors of the

Diocese in violation of Civil Code §3439.04(a)(1).

3574. Plaintiffs seek to set aside the transfer of 1726 Kearney Avenue.

3575. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3576. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SEVENTY-SIXTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3577. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3570-3576 of the Five Hundred And Seventy-Fifth Cause of Action.

3578. Plaintiffs believe that when 1726 Kearney Avenue was transferred, as alleged in ¶3572 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 1726 Kearney Avenue was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3579. Plaintiffs seek to set aside the transfer of 1726 Kearney Avenue.

3580. Plaintiffs are entitled to recover from the Diocese and Our Lady of Guadalupe San Diego RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3581. The Diocese and Our Lady of Guadalupe San Diego RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

289. ***Transfer of 2802 Cadiz Street (APN 450-450-26-00) - Against the Diocese and Saint Charles Borromeo RPSC***

FIVE HUNDRED AND SEVENTY-SEVENTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3582. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3583. Prior to September 1, 2019, the Diocese acquired the real property at 2802 Cadiz Street, San Diego 92110 ("APN 450-450-26-00").

3584. By Grant Deed recorded December 9, 2019 for no consideration, the Diocese transferred APN 450-450-26-00 to Saint Charles Borromeo RPSC.

3585. Plaintiffs believe and allege that on the date of the transfer of 450-450-26-00, as alleged in ¶3584 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 450-450-26-00 was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3586. Plaintiffs seek to set aside the transfer of 450-450-26-00.

3587. Plaintiffs are entitled to recover from the Diocese and Saint Charles Borromeo RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3588. The Diocese and Saint Charles Borromeo RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND SEVENTY-EIGHTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3589. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3582-3588 of the Five Hundred And Seventy-Seventh Cause

of Action.

3590. Plaintiffs believe that when APN 450-450-26-00 was transferred, as alleged in ¶3584 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 450-450-26-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3591. Plaintiffs seek to set aside the transfer of 450-450-26-00.

3592. Plaintiffs are entitled to recover from the Diocese and Saint Charles Borromeo RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3593. The Diocese and Saint Charles Borromeo RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

290. Transfer of APN Number 509-241-25-00 - Against the Diocese and Saint Louise De Marillac RPSC

FIVE HUNDRED AND SEVENTY-NINTH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3594. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3595. Prior to September 1, 2019, the Diocese acquired the Tax Parcel # 509-241-25-00 ("509-241-25-00").

3596. By Grant Deed recorded December 9, 2019 for no consideration, the Diocese transferred 509-241-25-00 to Saint Louise De Marillac RPSC.

3597. Plaintiffs believe and allege that on the date of the transfer of 509-241-25-00, as alleged in ¶3596 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 509-241-25-00 was made with

the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3598. Plaintiffs seek to set aside the transfer of 509-241-25-00.

3599. Plaintiffs are entitled to recover from the Diocese and Saint Louise De Marillac RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3600. The Diocese and Saint Louise De Marillac RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND EIGHTIETH CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3601. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3594-3600 of the Five Hundred And Seventy-Ninth Cause of Action.

3602. Plaintiffs believe that when 2005 Crest Drive was transferred, as alleged in ¶3596 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 509-241-25-00 was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3603. Plaintiffs seek to set aside the transfer of 509-241-25-00.

3604. Plaintiffs are entitled to recover from the Diocese and Saint Louise De Marillac RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3605. The Diocese and Saint Louise De Marillac RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

291. ***Transfer of 795 S. La Brucherie - Against the Diocese and Saint Mary El Centro RPSC***

FIVE HUNDRED AND EIGHTY-FIRST CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.04(a)(1)]

3606. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations.

3607. Plaintiffs are informed and believe and thereupon allege that Defendant SAINT MARY EL CENTRO CATHOLIC PARISH IN EL CENTRO, CALIFORNIA REAL PROPERTY SUPPORT CORPORATION ("Saint Mary El Centro RPSC") is a California religious corporation.

3608. Prior to September 1, 2019, the Diocese acquired the real property at 795 S. La Brucherie, El Centro 92243 ("95 S. La Brucherie").

3609. By Grant Deed recorded September 20, 2019 for no consideration, the Diocese transferred 95 S. La Brucherie to Saint Mary El Centro RPSC.

3610. Plaintiffs believe and allege that on the date of the transfer of 95 S. La Brucherie, as alleged in ¶3609 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 95 S. La Brucherie was made with the actual intent to hinder, delay, or defraud the creditors of the Diocese in violation of Civil Code §3439.04(a)(1).

3611. Plaintiffs seek to set aside the transfer of 95 S. La Brucherie.

3612. Plaintiffs are entitled to recover from the Diocese and Our Saint Mary El Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3613. The Diocese and Saint Mary El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

FIVE HUNDRED AND EIGHTY-SECOND CAUSE OF ACTION

[Set Aside Voidable Transaction - Civil Code § 3439.05]

3614. Plaintiffs re-allege and incorporate by this reference paragraphs 1-34 of the Preliminary Allegations and 3606-3613 of the Five Hundredth and Eighty-First Cause of Action.

3615. Plaintiffs believe that when 95 S. La Brucherie was transferred, as alleged in ¶3609 above, creditors, including Plaintiffs, had outstanding claims against the Diocese, for which it was indebted, and that the transfer of 95 S. La Brucherie was made without the Diocese receiving reasonably equivalent value and the Diocese was either insolvent at the time of the transfer or became insolvent as a result of the transfer, in violation of Civil Code §3439.05.

3616. Plaintiffs seek to set aside the transfer of 95 S. La Brucherie.

3617. Plaintiffs are entitled to recover from the Diocese and Saint Mary El Centro RPSC the full amount owed or awarded to Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgments awarded or entered.

3618. The Diocese and Saint Mary El Centro RPSC did the things herein alleged maliciously and to oppress the Diocese's creditors.

WHEREFORE, Plaintiffs pray judgment against Defendants, and each of them, as follows:

A. That all of the real property transfers, as described above, be set aside and declared void as to Plaintiffs so that Plaintiffs can recover on their Claims including recovering on any judgment or award against the Diocese in the Underlying Actions;

B. For general damages against the Diocese and each of the Parishes up to the full amount owed Plaintiffs on their Claims against the Diocese in the Underlying Actions, including any judgment that might be awarded or entered;

C. For costs of suit herein incurred; and

D. For such other and further relief as the Court deems fair and proper.

JURY DEMAND

Plaintiffs demand a jury trial on all issues so triable.

THE ZALKIN LAW FIRM, P.C.

Dated: 2-20-23 By: Devin M. Storey
Devin M. Storey, Esq.
Attorney for Plaintiffs