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**BURNS BAIR LLP**

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*Counsel for the Official Committee of Unsecured Creditors***UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

Case No. 23-40523 WJL

Chapter 11

*In re:*THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation sole,

Debtor.

**COVER SHEET TO FOURTH INTERIM  
FEE APPLICATION OF BURNS BAIR LLP  
AS SPECIAL INSURANCE COUNSEL TO  
THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR  
ALLOWANCE AND PAYMENT OF  
COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR THE PERIOD OF  
SEPTEMBER 1, 2024 THROUGH  
DECEMBER 31, 2024**

Judge: Hon. William J. Lafferty

Date: April 30, 2025

Time: 10:30 a.m. (Pacific Time)

Objection Deadline: March 7, 2025

Place: United States Bankruptcy Court

1300 Clay Street, Courtroom 220

Oakland

Name of Applicant:	Burns Bair LLP
Name of Client:	The Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland
Time period covered by this application:	September 1, 2024 through December 31, 2024
Total compensation sought this period:	\$456,140.00
Total expenses sought this period:	\$15,570.15
Petition date:	May 8, 2023
Retention date:	July 14, 2023
Date of Order approving employment:	August 16, 2023
Total compensation approved by interim order to date:	\$1,127,546.20
Total expenses approved by interim order to date:	\$38,401.41
Total compensation paid by interim order to date:	\$1,127,546.20
Total expenses paid by interim order to date:	\$38,401.41
Blended rate in the Interim Application for all attorneys:	\$753.50
Blended rate in the Interim Application for all timekeepers:	\$759.22
Fees sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$276,728.00
Expenses sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$10,108.64
If applicable, number of professionals in this application not included in staffing plan approved by client	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals included in this application:	10
Number of professionals billing fewer than 15 hours to the case during this period:	4
Are any rates higher than those approved or disclosed at retention?	No
Interim or Final:	Interim

**SUMMARY OF MONTHLY FEE STATEMENTS**

Date Filed & Docket	Period Covered	Total Compensation and Expenses Incurred		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date	
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees (80%)	Expenses (100%)
10/30/2024 [Dkt. 1431]	9/1/2024 – 9/30/2024	\$118,326.00	\$1,461.10	\$94,660.80	\$1,461.10	\$94,660.80	\$1,461.10
11/27/24 [Dkt. 1483]	10/1/2024- 10/31/2024	\$131,256.00	\$8,647.54	\$105,004.80	\$8,647.54	\$105,004.80	\$8,647.54
12/30/24 [Dkt. 1578]	11/1/2024 - 11/30/2024	\$96,328.00	\$0	\$77,062.40	\$0	\$77,062.40	\$0
1/30/25 [Dkt. 1682]	12/1/2024 - 12/31/2024	\$110,230.00	\$5,461.51	\$88,184.00	\$5,461.51	\$0	\$0

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Fee Application Not Yet Paid: \$184,873.51

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*Counsel for the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

Case No. 23-40523 WJL

*In re:*

Chapter 11

THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation  
sole,

Debtor.

**FOURTH INTERIM FEE APPLICATION OF  
BURNS BAIR LLP AS SPECIAL INSURANCE  
COUNSEL TO THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS FOR  
ALLOWANCE AND PAYMENT OF FEES  
AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD FROM SEPTEMBER 1, 2024  
THROUGH DECEMBER 31, 2024**

Judge: Hon. William J. Lafferty

Date: April 30, 2025

Time: 10:30 a.m. (Pacific Time)

Objection Deadline: March 7, 2025

Place: United States Bankruptcy Court

1300 Clay Street, Courtroom 220

Oakland, CA 94612

1 Burns Bair LLP (the “**Applicant**” or “**Burns Bair**”), special insurance counsel to the  
2 Official Committee of Unsecured Creditors (the “**Committee**”) of the Roman Catholic Bishop  
3 of Oakland (the “**Debtor**”) in the above captioned chapter 11 case (the “**Chapter 11 Case**”)  
4 hereby submits its Fourth Interim Fee Application (the “**Interim Application**”), for an order, in  
5 substantially the form attached hereto as **Exhibit A**, pursuant to sections 330 and 331 of title 11  
6 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of  
7 Bankruptcy Procedure (the “**Bankruptcy Rules**”), the United States Trustee Appendix B  
8 Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed  
9 Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013  
10 (the “**U.S. Trustee Guidelines**”), the *Guidelines for Compensation and Expense Reimbursement*  
11 *of Professionals and Trustees* (the “**Northern District Guidelines**”), and the Local Bankruptcy  
12 Rules for the Northern District of California (the “**Local Rules**”), and the *Order Authorizing*  
13 *Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the  
14 “**Interim Compensation Order**”) [Dkt. No. 170] entered by the Court on June 23, 2023, for  
15 interim approval and allowance of (i) compensation for professional services rendered to the  
16 Committee from September 1, 2024 through and including December 31, 2024 (the “**Interim**  
17 **Fee Period**”) and (ii) reimbursement of expenses incurred in connection with such services; and,  
18 in support thereof, respectfully represents as follows:

19 **PRELIMINARY STATEMENT**

20 1. Since Burns Bair’s retention by the Committee on July 14, 2023, Burns Bair has  
21 been actively engaged in all aspects of the case with the goal of maximizing insurance recoveries  
22 to unsecured creditors of the Debtor. Upon its retention, Burns Bair reviewed and analyzed  
23 thousands of pages of the Debtor’s historical insurance policy materials, developed insurance  
24 exposure assessments for each of the Debtor’s insurance carriers, researched and briefed various  
25 insurance motions in both the main Case and the insurance adversary proceeding, presented to  
26 the Committee on case insurance issues, and began to develop the Committee’s overall insurance  
27 strategy, among other time-sensitive tasks.  
28

2. These efforts have required Burns Bair to work closely with the Committee and its lead counsel to keep the Committee informed throughout this Chapter 11 Case. Burns Bair has also worked with the Debtor and its professional advisors, always with the goal of maximizing insurance returns for the unsecured creditors.

3. The Interim Application is based upon the points and authorities cited herein, the Declarations of Jesse J. Bair and Steve Woodall, filed concurrently herewith, the exhibits attached thereto, the pleadings, papers, and records on file in this case, and any evidence or argument that the Court may entertain at the time of the hearing on the Interim Application.

## JURISDICTION

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. sections 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the Local Rules. This is a core proceeding pursuant to 28 U.S.C. section 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. sections 1408 and 1409.

## CASE BACKGROUND AND STATUS

### A. Debtor's Bankruptcy Proceedings

5. The Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on May 8, 2023 (the “**Petition Date**”). The Debtor continues to operate its business and manages its properties as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. By Order dated May 10, 2024, the Court appointed David M. Klauder as fee examiner in this Chapter 11 Case [Dkt. 1122]. On November 8, 2014, the Debtor filed a proposed Plan of Reorganization [Dkt. 1444], which the Committee is opposing.

## B. Selection of the Committee

6. On May 23, 2023, pursuant to Section 1102 of the Bankruptcy Code, the Office of the United States Trustee (the “**U.S. Trustee**”) selected interested creditors to serve on the Committee. Pursuant to section 1102(a)(1) of the Bankruptcy Code, the U.S. Trustee appointed nine members to serve on the Committee. Upon formation, the Committee selected Mr. Steve Woodall as its chair. On May 30, 2023, the Committee selected Lowenstein Sandler LLP as its

1 lead counsel. On June 1, 2023, the Committee selected Keller Benvenuti Kim LLP as local  
2 bankruptcy counsel. On July 14, 2023, the Committee selected Burns Bair LLP as special  
3 insurance counsel.

4 **C. The Committee's Retention of Burns Bair**

5 7. On August 16, 2023, the Court entered the *Order Authorizing Retention of Burns*  
6 *Bair LLP as Special Insurance Counsel for the Official Committee of Unsecured Creditors of*  
7 *the Roman Catholic Bishop of Oakland, Effective as of July 14, 2023* [Dkt. No. 372]  
8 (the "**Retention Order**"). The Retention Order authorizes compensation and reimbursement to  
9 Burns Bair in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Northern District  
10 Guidelines, the Local Rules, and the Interim Compensation Order. Subject to Burns Bair's  
11 application to the Court, the Debtor is authorized by the Retention Order to compensate Burns  
12 Bair at its standard hourly rates for services performed and to reimburse it for actual and  
13 necessary expenses incurred. The Retention Order authorizes Burns Bair to provide the  
14 following services to the Committee: (1) analyze, investigate, and assess the availability of  
15 coverage under the Debtor's insurance policies; (2) represent the Committee in the adversary  
16 proceedings the Debtor filed against its insurers, Adv. Pro. No. 23-04028, *The Roman Catholic*  
17 *Bishop of Oakland v. Pacific Indemnity, et. al.* and Adv. Pro. No. 23-04037, *The Roman Catholic*  
18 *Bishop of Oakland vs. American Home Assurance Co.* (jointly, the "**Insurance Adversary**  
19 **Proceedings**") (3) engage in potential mediation and/or other resolution of the claims, demands,  
20 and/or lawsuits related to the Debtor's insurance policies; (4) advise, negotiate, and advocate on  
21 behalf of the Committee with respect to the Debtor's insurance policies; and (5) provide related  
22 advice and assistance to the Committee as necessary [Dkt No. 372].

23 **D. Summary of Professional Compensation and Reimbursement of Expenses**  
24 **Requested**

25 8. By this Interim Application, the Applicant seeks interim allowance of  
26 compensation in the amount of **\$456,140.00** and actual and necessary expenses in the amount of  
27 **\$15,570.15** for a total allowance of **\$471,710.15** for the Interim Fee Period.

28 9. All services for which Burns Bair requests compensation were performed for or  
on behalf of the Committee. Burns Bair has received no promises of payment from any source

1 other than the Debtor for services rendered or to be rendered in any capacity whatsoever in  
2 connection with the matters covered by this Interim Application.

3 10. There is no agreement or understanding between Burns Bair and any other person  
4 other than the partners of Burns Bair for the sharing of compensation to be received for services  
5 rendered in this Chapter 11 Case. In connection with the Chapter 11 Case, as of this date Burns  
6 Bair has been paid **\$1,404,274.20** in fees and **\$48,510.05** in expenses.

7 11. Burns Bair has billed the Committee in accordance with its existing billing rates  
8 and procedures in effect during the Interim Fee Period. These rates are the same rates Burns  
9 Bair charges for services rendered by its attorneys and paraprofessionals in comparable matters  
10 and are reasonable given the compensation charged by comparably skilled practitioners in  
11 similar matters in both the California and national markets. The Summary Sheet filed herewith  
12 contains tables listing the Burns Bair attorneys and paraprofessional who have performed  
13 services for the Committee during the Interim Fee Period, including their job titles, hourly rates,  
14 aggregate number of hours worked in this matter, and, for attorneys, the year in which each  
15 professional was licensed to practice law. Exhibit E also contains a table summarizing the hours  
16 worked by the Firm's attorneys and paraprofessionals broken down by project billing code.  
17 Burns Bair maintains computerized time records, which have been filed on the docket with the  
18 Firm's monthly fee statements and furnished to the Committee, the Debtor, and the U.S. Trustee  
19 in the format specified by the Interim Compensation Order and are attached hereto as Exhibit G.  
20 The Committee has reviewed the Interim Application and approves the fees and expenses  
21 requested herein.

22 12. To the extent that time or disbursement charges for services rendered or  
23 disbursements incurred relate to the Interim Fee Period but were not processed prior to the  
24 preparation of this Application, Burns Bair reserves the right to request additional compensation  
25 for such services and reimbursement of such expenses in a future application.

26  
27  
28

**SUMMARY OF SERVICES PERFORMED**  
**BY BURNS BAIR DURING THE INTERIM FEE PERIOD**

13. During the Interim Fee Period, Burns Bair professionals expended 600.80 hours on behalf of the Committee. Of this, 271.60 hours were expended by Burns Bair partners, 322.40 hours by Burns Bair associates, and 6.8 hours by paraprofessionals. In accordance with the Interim Compensation Order, the Northern District Guidelines, the U.S. Trustee Guidelines, and the Local Rules, Burns Bair has classified services performed into four specific categories set forth below. Burns Bair has attempted to place the services provided in the category that best relates to such services; because certain services may relate to one or more categories, however, services pertaining to one category may in fact be included in another category. The following summary of services rendered during the Interim Fee Period is not intended to be a detailed description of the work performed. Rather, it merely highlights certain project billing categories in which significant services were rendered by Burns Bair, as well as identifies some of the issues Burns Bair was required to address.

**A. Committee Meetings**  
**Fees: \$25,639; Total Hours: 25.70**

14. During the Interim Fee Period, Burns Bair attorneys attended multiple Committee meetings and state court counsel meetings for the purpose of advising on case insurance issues. Meetings with the Committee and their state court counsel are a necessary aspect of Burns Bair's legal representation of the Committee.

**B. Fee Applications**  
**Fees: \$6,998; Total Hours: 10.70**

15. During the Interim Fee Period, Burns Bair prepared four Monthly Fee Statements for the periods August 1, 2024 through August 31, 2024 [Dkt No. 1352], September 1, 2024 through September 30, 2024 [Dkt. No. 1431], October 1, 2024 through October 31, 2024 [Dkt. No. 1483], and November 1, 2024 through November 30, 2024 [Dkt. No. 1578]. Burns Bair also prepared its Third Interim Fee Application [Dkt. 1403] and participated in the fee hearing on same.

1           **C.     Hearings**

2                   **Fees: \$21,736; Total Hours: 23.30**

3           16.     During the Interim Fee Period, Burns Bair attorneys appeared before the Court as  
4 special insurance counsel to the Committee at various hearings in both the Insurance Adversary  
5 Proceedings and the main Chapter 11 Case concerning case insurance issues, including, without  
6 limitation, hearings on the Committee's survivor statement motion, the Debtor's disclosure  
7 statement, the Debtor's motion to enlarge time to respond to the Committee's lift stay and  
8 derivative standing motions, and case management conference in the District Court insurance  
9 action.

10           **D.     Insurance Recovery Activities**

11                   **Fees: \$401,767; Total Hours: 541.10**

12           17.     In addition to the above described tasks, during the Interim Fee Period, Burns  
13 Bair expended a considerable number of hours on behalf of the Committee performing additional  
14 insurance recovery activities including, but not limited to, preparing for and participating in  
15 multiple full-day mediation sessions; preparing detailed insurance strategy presentations for  
16 presentation to the Committee and State Court Counsel; analyzing and responding to insurance  
17 term sheets received from the Debtor and the insurers; comprehensive analysis of insurance  
18 issues in connection with the Debtor's proposed Plan of Reorganization and Disclosure  
19 Statement, including associated legal research; drafting insurance portions of the Committee's  
20 lift stay briefing, including associated legal research and factual analysis; drafting insurance  
21 portions of the Committee's disclosure statement objection; drafting the Committee's insurance  
22 derivative standing motion, including associated legal research and factual analysis; drafting the  
23 Committee's opposition to the Debtor's motion to hold the insurance District Court action in  
24 abeyance; participating in meet and confers in connection with the District Court insurance  
25 action, including issues concerning the insurers' motions to dismiss and further amendments to  
26 the complaint; drafting the Committee's portions of the insurance case management statements;  
27 continued detailed research of California law and analysis of Debtor historical policy materials  
28 in connection with potential Plan structure and settlement issues; and continuing to develop  
overall insurance strategy for the Committee.

1                                    **ACTUAL AND NECESSARY DISBURSEMENTS**

2            18.      During the Interim Fee Period, Burns Bair incurred a total of **\$15,570.15** in  
3 expenses. These expenses relate primarily to travel in connection with court hearings and in-  
4 person mediations, as well as payment for court fees. These expenses are reasonable and  
5 necessary for the administration of the Chapter 11 Case.

6                                    **LEGAL BASIS FOR INTERIM COMPENSATION**

7            19.      The professional services for which Burns Bair requests interim allowance of  
8 compensation and reimbursement of expenses were rendered and incurred in connection with  
9 this case in the discharge of Burns Bair's professional responsibilities as special insurance  
10 counsel for the Committee in this Chapter 11 Case. Burns Bair's services have been necessary  
11 and beneficial to the Committee, the Debtor, its estate, creditors, and other parties of interest.

12           20.      In accordance with the factors enumerated in section 330 of the Bankruptcy Code,  
13 Burns Bair respectfully submits that the amount requested by Burns Bair is fair and reasonable  
14 given the complexity of the Chapter 11 Case, the time expended, the nature and extent of the  
15 services rendered, the value of such services, and the costs of comparable services other than in  
16 a case under the Bankruptcy Code. Moreover, Burns Bair has reviewed the requirements of the  
17 Interim Compensation Order, the Northern District Guidelines, and the UST Guidelines and  
18 believes that the Interim Application complies with all of them.

19                                   **COMPLIANCE WITH LARGE CASE REQUIREMENTS**

20           21.      Charts and tables based on such forms, and certain other exhibits, are attached  
21 and filled out with data to the extent relevant to this Chapter 11 Case:

22                   **Exhibit B:** Customary and Comparable Compensation Disclosures with Fee  
23 Applications

24                   **Exhibit C:** Budget and Staffing Plan;

25                   **Exhibit D:** Summary of Timekeepers in this Application

26                   **Exhibit E:** Summary of Compensation by Project Category;

27                   **Exhibit F:** Summary of Expense Reimbursement; and

28                   **Exhibit G:** Detailed records for the Compensation Period.

22. Pursuant to paragraph C.5 of the Large Case Guidelines, Burns Bair provides the following statements:

Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A. The fees sought in this fee application do not exceed the fees budgeted for the time period covered.
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No.
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.	No. Any time worked on these tasks would have been in connection with preparing monthly fee statements.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	In connection with preparing monthly fee statements, Burns Bair spent approximately 1.7 hours reviewing invoices for privilege or other confidential information.
If the fee application includes any rate increases since retention: i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?	N/A

1 **AVAILABLE FUNDS**

2 23. The Applicant understands that the Debtor's estate has sufficient funds available  
3 to pay the fees and costs sought herein.

4 **NOTICE**

5 Notice of the Interim Application has been provided to parties in interest in accordance  
6 with the procedures set forth in the Interim Compensation Order. Burns Bair submits that, in  
7 view of the facts and circumstances of the Chapter 11 Case, such notice is sufficient, and no  
8 other or further notice need be provided.

9 **CONCLUSION**

10 Burns Bair respectfully requests an interim allowance to Burns Bair as compensation  
11 for fees in the amount of **\$456,140.00** and actual and necessary expenses in the amount of  
12 **\$15,570.15** for a total allowance of **\$471,710.15**; and for such other and further relief as this  
13 Court deems proper.

14 Date: February 14, 2025

Respectfully submitted,

15 **BURNS BAIR LLP**

16  
17 By: /s/ Jesse J. Bair  
18 Jesse J. Bair

19 *Special Insurance Counsel for the*  
20 *Official Committee of Unsecured Creditors*

# **Exhibit A**

**LOWENSTEIN SANDLER LLP**

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*Counsel for the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

*In re:*

THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**ORDER GRANTING FOURTH INTERIM  
FEE APPLICATION OF BURNS BAIR LLP  
AS SPECIAL INSURANCE COUNSEL TO  
THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR  
ALLOWANCE AND PAYMENT OF  
COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD OF SEPTEMBER 1, 2024  
THROUGH DECEMBER 31, 2024**

Judge: Hon. William J. Lafferty

Date: April 30, 2025

Time: 10:30 a.m. (Pacific Time)

Objection Deadline: March 7, 2025

Place: United States Bankruptcy Court

1300 Clay Street, Courtroom 220

Oakland, CA 94612

Upon consideration of the *Fourth Interim Fee Application of Burns Bair LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period of September 1, 2024 through December 31, 2024* (the “**Interim Application**”);<sup>1</sup> and this Court having jurisdiction to consider the Interim Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal) and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California; and consideration of the Interim Application and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Interim Application having been provided to the parties listed therein, and it appearing that no other or further notice need be provided; and this Court having reviewed the Interim Application of Burns Bair; and, upon the record and all of the proceedings had before the Court; and this Court having found and determined that the relief sought in the Interim Application is in the best interests of the Debtor, its estate, creditors, and all parties in interest; and that the legal and factual bases set forth in the Interim Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Interim Application is granted as provided herein.
2. Burns Bair is awarded an interim allowance of its compensation for professional services rendered in the amount of \$471,710.15 consisting of \$456,140.00 of fees and reimbursement of \$15,570.15 of actual and necessary expenses incurred during the Interim Fee Period.
3. The Debtor is directed to pay Burns Bair the amount allowed in paragraph 2 above.
4. The Court shall retain jurisdiction to determine any controversy arising in connection with this Order.

**\*\* END OF ORDER \*\***

<sup>1</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Interim Application.

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**Court Service List**

*All registered ECF participants.*

**EXHIBIT B**  
**CUSTOMARY AND COMPARABLE DISCLOSURES WITH FEE APPLICATIONS**

**Privacy Act Statement.** 28 U.S.C. § 586(a)(3)(A) authorizes the collection of this information. The United States Trustee will use the information contained in this form to evaluate whether compensation and reimbursement of expenses filed by attorneys in larger chapter 11 cases - those cases with \$50 million or more in assets and \$50 million or more in liabilities - are appropriate and reasonable pursuant to 11 U.S.C. § 330. Disclosure of this information may be to a bankruptcy trustee or examiner when the information is needed to perform the trustee's or examiner's duties, or to the appropriate federal, state, local, regulatory, tribal, or foreign law enforcement agency when the information indicates a violation or potential violation of law. Other disclosures may be made for routine purposes. For a discussion of the types of routine disclosures that may be made, you may consult the Executive Office for United States Trustee's systems of records notice, UST-001, "Bankruptcy Case Files and Associated Records." See 71 Fed. Reg. 59,818 et seq. (Oct. 11, 2006). A copy of the notice may be obtained at the following link: <https://www.gpo.gov/fdsys/pkg/FR-2006-10-11/pdf/E6-16814.pdf>.

Failure to provide this information could result in an objection to your fee application, or other action by the United States Trustee. 11 U.S.C. § 330.

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

Category of Timekeeper	Blended Hourly Rate	
	BILLED <sup>1</sup> Firm for proceeding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner	\$977.79	\$1,045.32
Associate	\$513.45	\$527.05
Paralegal	\$374.81	\$340.00
All Timekeepers Aggregated	\$622.67	\$759.22

Case Name: Roman Catholic Bishop of Oakland  
Case Number: 23-BK-40523  
Applicant's Name: Burns Bair LLP  
Date of Application: February 14, 2025  
Interim or Final: Interim

<sup>1</sup> In addition to traditional hourly matters, Burns Bair also worked on contingent cases where hours are tracked each month, but not billed to the client.

## EXHIBIT C

### PROPOSED FOURTH INTERIM BUDGET AND STAFFING PLAN FOR SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE ROMAN CATHOLIC BISHOP OF OAKLAND FOR THE PERIOD SEPTEMBER 1, 2024 THROUGH DECEMBER 31, 2024

Project Category	Estimated Hours		Estimated Fees <sup>1</sup>	
	Low	High	Low	High
Meetings of and Communication with Creditors	70	90	\$46,760	\$60,120
Fee Applications	15	20	\$10,020	\$13,360
Hearings	40	60	\$26,720	\$40,080
Mediation	80	120	\$53,440	\$80,160
Plan and Disclosure Statement	55	75	\$36,740	\$50,100
Other Insurance Recovery Activities, including Adversary Proceedings and Bankruptcy Litigation	375	450	\$250,500	\$300,600
<b>TOTAL</b>	<b>635</b>	<b>815</b>	<b>\$424,180</b>	<b>\$544,420</b>

Burns Bair reserves its right to modify this budget and staffing plan in the event circumstances unforeseen at the time these were prepared would cause Burns Bair to be required to utilize additional or different staffing to appropriately deal with events that may arise in the bankruptcy case.

### STAFFING PLAN FOR COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE ROMAN CATHOLIC BISHOP OF OAKLAND FOR THE PERIOD SEPTEMBER 1, 2024 THROUGH DECEMBER 31, 2024

Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter During the Budget Period	Average Hourly Rate
Partner	2	\$900 - \$1120
Associate	4-6	\$470 - \$550
Paralegal	2	\$340

Burns Bair reserves its right to modify this budget and staffing plan in the event circumstances unforeseen at the time these were prepared that would cause Burns Bair to be required to utilize additional or different staffing to appropriately deal with events that may arise in the bankruptcy cases.

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<sup>1</sup> Burns Bair's estimated fees are calculated at the rate of \$668 per hour.

## EXHIBIT D

### SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

NAME OF PROFESSIONAL:	POSITION	YEAR ADMITTED	HOURLY RATE	TOTAL HOURS	TOAL FEES
Timothy W. Burns	Partner	1991	\$1,120.00	179.40	\$200,928.00
Jesse J. Bair	Partner	2013	\$900.00	92.20	\$82,980.00
Morgan K. Stippel	Associate	2018	\$550.00	27.50	\$15,125.00
Nathan M. Kuenzi	Associate	2020	\$550.00	169.30	\$93,115.00
Brian P. Cawley	Associate	2020	\$550.00	30.80	\$16,940.00
Karin Jonch-Clausen	Associate	2020	\$550.00	2.30	\$1,265.00
Alexander R. Castro	Associate	2024	\$470.00	79.20	\$37,224.00
Katherine Sticklen	Associate	2024	\$470.00	13.30	\$6,251.00
Brenda Horn-Edwards	Paralegal	N/A	\$340.00	4.70	\$1,598.00
Karen Dempski	Paralegal	N/A	\$340.00	2.10	\$714.00
<b>Total:</b>				<b>600.80</b>	<b>\$456,140.00</b>

**EXHIBIT E**

**SUMMARY OF COMPENSATION REQUESTED BY CATEGORY**

<b>Category</b>	<b>Hours Billed this Fee Period</b>	<b>Total for Fee Statement</b>
Committee Meetings	25.70	\$25,639.00
Fee Applications	10.70	\$6,998.00
Hearings	23.30	\$21,736.00
Insurance Recovery Activities	541.10	\$401,767.00
<b>Total:</b>	<b>600.80</b>	<b>\$456,140.00</b>

**EXHIBIT F**

**SUMMARY OF EXPENSE REIMBURSEMENT**

<b>Expense Category</b>	<b>Total Expenses</b>
Court Fees	\$677.00
PACER	\$100.70
Travel – Flights	\$6,220.25
Travel – Hotels	\$5,976.41
Travel – Meals	\$1,112.51
Travel – Mileage, Tolls, Parking, Taxi/Uber	\$1,483.28
<b>TOTAL:</b>	<b>\$15,570.15</b>

# **Exhibit G**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Roman Catholic Bishop of Oakland UCC**

**Issue Date :** 10/30/2024

**Bill # :** 01578

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/6/2024	Timothy Burns	Participate in Committee meeting for insurance purposes re insurance strategy and upcoming mediation session (1.1);	1.10	\$1,232.00
9/6/2024	Jesse Bair	Prepare for Committee meeting (.1); participate in Committee meeting for insurance re strategy and demands re upcoming mediation session (1.1);	1.20	\$1,080.00
9/12/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re Committee response to the Debtor's term sheet (1.3);	1.30	\$1,170.00
9/12/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes re Committee response to the Debtor's term sheet (1.3);	1.30	\$1,456.00
9/13/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re potential Committee response and next-steps re the Debtor's proposed term sheet (1.3);	1.30	\$1,170.00
9/13/2024	Timothy Burns	Participate in Committee meeting for insurance purposes re mediation strategy, the debtor's term sheet, and next-steps (1.3);	1.30	\$1,456.00
9/20/2024	Timothy Burns	Participate in Committee meeting re ongoing mediation negotiations (1.8);	1.80	\$2,016.00
9/20/2024	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re ongoing mediation negotiations (.5);	0.50	\$450.00
9/26/2024	Timothy Burns	Participate in state court counsel insurance strategy meeting (1.4);	1.40	\$1,568.00

9/26/2024	Jesse Bair	Participate in state court counsel meeting re Committee insurance strategy presentation (1.4);	1.40	\$1,260.00
<b>Totals for Committee Meetings</b>			<b>12.60</b>	<b>\$12,858.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/27/2024	Jesse Bair	Review and edit Burns Bair monthly fee statement (.1); correspond with G. Albert and B. Horn-Edwards re same (.1);	0.20	\$180.00
9/27/2024	Brenda Horn-Edwards	Draft Burns Bair professional monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
9/27/2024	Jesse Bair	Review Burns Bair invoice for privilege and confidential information (.8);	0.80	\$720.00
<b>Totals for Fee Applications</b>			<b>1.30</b>	<b>\$1,002.00</b>

### Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/1/2024	Timothy Burns	Continue detailed legal research and analysis re California no voluntary payment provision case law and its impact on settlement and plan design (.9);	0.90	\$1,008.00
9/2/2024	Brian Cawley	Complete supplemental research re consequences of breach of no voluntary payments provisions under California law (.6);	0.60	\$330.00
9/2/2024	Nathan Kuenzi	Detailed analysis of all Debtor policies and draft chart outlining each voluntary payments/consent to settle provision included in the RCBO policies (3.4);	3.40	\$1,870.00
9/2/2024	Jesse Bair	Review and respond to correspondence with Committee professionals re preparations for mediation strategy meeting with the Committee (.2);	0.20	\$180.00
9/2/2024	Nathan Kuenzi	Correspond with T. Burns re policy language chart summarizing all RCBO no voluntary payment/consent to settle provisions (.2);	0.20	\$110.00
9/2/2024	Morgan Stippel	Complete supplemental research project re particular aspects of no voluntary payment provisions under California law and potential impact of diocese settlement/assignment on overall insurance coverage (1.4);	1.40	\$770.00
9/3/2024	Jesse Bair	Review and respond to correspondence with Lowenstein re mediation strategy presentation to the Committee (.1);	0.10	\$90.00

9/3/2024	Timothy Burns	Finalize initial research memo re no voluntary payment provision issues (.6);	0.60	\$672.00
9/3/2024	Alexander Castro	Participate in conference with T. Burns and associates re research projects re assignments and insurance demands (.1);	0.10	\$47.00
9/3/2024	Nathan Kuenzi	Analyze RCBO policies for endorsement language re consent to settle issues (1.4);	1.40	\$770.00
9/3/2024	Morgan Stippel	Participate in conference with T. Burns re research project re post-loss assignment under particular factual scenarios pursuant to Fluor Corp. v. Superior Ct., 61 Cal. 4th 1175, 354 P.3d 302 (2015) (.1);	0.10	\$55.00
9/3/2024	Alexander Castro	Begin drafting survey of California case law re denials of bad faith failure to settle claim under particular factual scenarios (1.9);	1.90	\$893.00
9/3/2024	Jesse Bair	Review and respond to correspondence with the debtor re call to discuss Fourth Amended Complaint (.1);	0.10	\$90.00
9/3/2024	Jesse Bair	Participate in conference with T. Burns re insurance Plan structures (.1);	0.10	\$90.00
9/3/2024	Timothy Burns	Prepare research project re assignment and timing of demand (.1); provide instructions to associates re same (.1); participate in conference with J. Bair re insurance Plan structures (.1);	0.30	\$336.00
9/3/2024	Timothy Burns	Participate in call with state court counsel re no voluntary payment issues (.2); correspond with state court counsel re same (.2);	0.40	\$448.00
9/3/2024	Timothy Burns	Participate in calls with B. Weisenberg re upcoming Committee meeting (.4);	0.40	\$448.00
9/3/2024	Jesse Bair	Review correspondence with state court counsel and T. Burns re no-voluntary payment research and related case strategy (.1);	0.10	\$90.00
9/3/2024	Morgan Stippel	Begin legal research re post-loss assignment under particular factual scenarios pursuant to Fluor Corp. v. Superior Ct., 61 Cal. 4th 1175, 354 P.3d 302 (2015) (1.6);	1.60	\$880.00
9/4/2024	Brian Cawley	Continue analyzing and summarizing each California case addressing covenants not to execute and assignments where an insurer is defending under a reservation of rights pursuant to Hamilton v. Maryland Casualty Co., 41 P.3d 128 (Cal. 2002) (1.6);	1.60	\$880.00
9/4/2024	Alexander Castro	Continue drafting survey of California case law re denials of bad faith failure to settle claim under particular factual scenarios (1.8);	1.80	\$846.00

9/4/2024	Jesse Bair	Participate in conference with T. Burns re upcoming mediation session and overall Committee insurance strategy (.2);	0.20	\$180.00
9/4/2024	Timothy Burns	Participate in conference with J. Bair re upcoming mediation and related insurance strategy (.2);	0.20	\$224.00
9/4/2024	Timothy Burns	Begin preparing for upcoming mediation session, including review of insurer exposure assessments and claim counts (.7);	0.70	\$784.00
9/5/2024	Brian Cawley	Supplemental analysis and summary of each California case addressing covenants not to execute and assignments where an insurer is defending under a reservation of rights pursuant to Hamilton v. Maryland Casualty Co., 41 P.3d 128 (Cal. 2002) (1.3);	1.30	\$715.00
9/5/2024	Nathan Kuenzi	Analyze arguments made by insurers in opposition to Debtor/Committee Plans in other diocesan cases and summarize same for T. Burns in connection with RCBO case (1.5);	1.50	\$825.00
9/5/2024	Nathan Kuenzi	Participate in conference with J. Bair re Fourth Amended Complaint excess insurer allegations (.1);	0.10	\$55.00
9/5/2024	Karen DempSKI	Docket/calendar hearing re fourth motion to extend (.1);	0.10	\$34.00
9/5/2024	Timothy Burns	Prepare insurance strategy presentation for upcoming state court counsel meeting (4.8);	4.80	\$5,376.00
9/5/2024	Jesse Bair	Participate in conference with N. Kuenzi re Fourth Amended Complaint excess insurer allegations (.1);	0.10	\$90.00
9/5/2024	Morgan Stippel	Continue legal research re post-loss assignment under particular factual scenarios pursuant to Fluor Corp. v. Superior Ct., 61 Cal. 4th 1175, 354 P.3d 302 (2015) (1.9);	1.90	\$1,045.00
9/5/2024	Alexander Castro	Finish drafting survey of California case law re denials of bad faith failure to settle claim under particular factual scenarios (1.4);	1.40	\$658.00
9/5/2024	Jesse Bair	Analysis re potential Plan insurance structures (.1);	0.10	\$90.00
9/6/2024	Morgan Stippel	Complete legal research re post-loss assignment under particular factual scenarios pursuant to Fluor Corp. v. Superior Ct., 61 Cal. 4th 1175, 354 P.3d 302 (2015), including drafting of summary re relevant case law (1.8);	1.80	\$990.00
9/6/2024	Katie Sticklen	Supplemental legal research re the timing and content of insurance demands (1.4);	1.40	\$658.00

9/6/2024	Jesse Bair	Review T. Burns email memo re potential insurance Plan structures (.1);	0.10	\$90.00
9/6/2024	Timothy Burns	Participate in call with B. Weisenberg and J. Bair re insurance strategy and preparations in connection with upcoming Committee meeting and mediation session (.3);	0.30	\$336.00
9/6/2024	Jesse Bair	Participate in call with B. Wiesenberg and T. Burns re upcoming Committee meeting, insurance strategy, and preparations for upcoming mediation session (.3);	0.30	\$270.00
9/6/2024	Timothy Burns	Prepare for Committee meeting and insurance presentation in connection with same (1.1);	1.10	\$1,232.00
9/6/2024	Brian Cawley	Finish analyzing and summarizing each California case addressing covenants not to execute and assignments where an insurer is defending under a reservation of rights pursuant to Hamilton v. Maryland Casualty Co., 41 P.3d 128 (Cal. 2002) (1.5);	1.50	\$825.00
9/6/2024	Timothy Burns	Participate in portion of meet and confer with the Debtor and J. Bair re Fourth Amended Complaint (.5);	0.50	\$560.00
9/6/2024	Jesse Bair	Correspond with the debtor re the Committee's carrier claim counts and potential discrepancies with the Debtor's lists (.1);	0.10	\$90.00
9/6/2024	Jesse Bair	Prepare for meet and confer with the debtor re Fourth Amended Complaint (.1); participate in meet and confer with the Debtor re same (.6);	0.70	\$630.00
9/6/2024	Nathan Kuenzi	Correspond with J. Bair re carrier claim count information (.1);	0.10	\$55.00
9/7/2024	Timothy Burns	Review and respond to B. Cawley email memo re assignment case law and review attached cases (.2);	0.20	\$224.00
9/7/2024	Timothy Burns	Review correspondence with the debtor and J. Bair re amended complaint materials (.1);	0.10	\$112.00
9/7/2024	Timothy Burns	Review the Committee's response to the Debtor's mediation submission (.2);	0.20	\$224.00
9/9/2024	Timothy Burns	Review research chart re California assignment caselaw (.4);	0.40	\$448.00
9/9/2024	Timothy Burns	Review CNA correspondence with the debtor re draft amended complaint (.2);	0.20	\$224.00
9/9/2024	Timothy Burns	Review Debtor's meet and confer letter with insurers re document production in insurance adversary (.1);	0.10	\$112.00

9/9/2024	Timothy Burns	Review draft tolling agreement between RCBO and insurers re RCBO's breach of contract claims (.2);	0.20	\$224.00
9/10/2024	Jesse Bair	Review and respond to correspondence with state court counsel re insurance strategy issues and demand letters (.2);	0.20	\$180.00
9/10/2024	Jesse Bair	Prepare for 9/10 mediation session (.2);	0.20	\$180.00
9/10/2024	Timothy Burns	Participate in portion of full-day mediation session (4.9);	4.90	\$5,488.00
9/10/2024	Jesse Bair	Participate in post-mediation session conference with Committee professionals re outcome of session and next-steps re case strategy (.8);	0.80	\$720.00
9/10/2024	Timothy Burns	Prepare for mediation session, including by reviewing various research memos re California insurance issues (1.4);	1.40	\$1,568.00
9/10/2024	Jesse Bair	Brief review re final version of the Committee's PowerPoint presentation for 9/10 mediation session (.1);	0.10	\$90.00
9/10/2024	Timothy Burns	Participate in post-mediation session conference with Committee professionals re outcome of session and next-steps re case strategy (.8);	0.80	\$896.00
9/10/2024	Jesse Bair	Review the Committee's memorandum and accompanying exhibits rebutting the debtor's "comparable claims" table (.3);	0.30	\$270.00
9/10/2024	Jesse Bair	Participate in portion of full-day mediation session (4.5);	4.50	\$4,050.00
9/11/2024	Timothy Burns	Participate in call with Lowenstein and J. Bair re the debtor's mediation term sheet (.6);	0.60	\$672.00
9/11/2024	Timothy Burns	Review correspondence with debtor and LMI re tolling agreement (.1);	0.10	\$112.00
9/11/2024	Timothy Burns	Participate in additional call with Lowenstein re ongoing mediation negotiations (.2);	0.20	\$224.00
9/11/2024	Jesse Bair	Review and respond to correspondence with the debtor re the insurers' responses to the Committee's demand letters (.1); participate in call with T. Burns re the debtor's mediation term sheet (.1);	0.20	\$180.00
9/11/2024	Jesse Bair	Review B. Cawley memo re Chubb unfair claims handling practices (.1);	0.10	\$90.00
9/11/2024	Jesse Bair	Participate in call with the Committee professionals re potential response to the debtor's mediation term sheet (.6);	0.60	\$540.00
9/11/2024	Timothy Burns	Review the debtor's mediation term sheet (.2); participate in call with J. Bair re same (.1);	0.30	\$336.00
9/12/2024	Timothy Burns	Prepare for state court counsel meeting re term sheet issues (.9);	0.90	\$1,008.00

9/12/2024	Timothy Burns	Participate in conference with J. Bair re Committee response to the Debtor's term sheet (.2); participate in additional conference with B. Wiesenbergs and J. Bair re same (.3);	0.50	\$560.00
9/12/2024	Timothy Burns	Meet with M. Stippel re research assignment re claim splitting and Cal. Ins. Code. Section 11580 (.2);	0.20	\$224.00
9/12/2024	Morgan Stippel	Participate in conference with T. Burns re research assignment re claim splitting and Cal. Ins. Code. Section 11580 (.2);	0.20	\$110.00
9/12/2024	Jesse Bair	Participate in conference with T. Burns re Committee response to the Debtor's term sheet (.2); participate in additional conference with B. Wiesenbergs and T. Burns re same (.3);	0.50	\$450.00
9/12/2024	Timothy Burns	Participate in call with Lowenstein re upcoming state court counsel meeting re insurance mediation strategy (.2);	0.20	\$224.00
9/12/2024	Timothy Burns	Review additional correspondence with the debtor and insurers re tolling agreement issues (.2);	0.20	\$224.00
9/13/2024	Jesse Bair	Review draft tolling agreement with the insurers (.1); review various correspondence with the debtor and insurers re additional revisions needed to same (.2);	0.30	\$270.00
9/13/2024	Timothy Burns	Review correspondence with J. Bair and Committee professionals re claims valuation (.1);	0.10	\$112.00
9/13/2024	Timothy Burns	Review revised version of drafting tolling agreement (.1); review additional correspondence with the debtor and insurers re same (.1);	0.20	\$224.00
9/13/2024	Jesse Bair	Brief review of final version of the debtor's fourth amended complaint (.2); correspond with Lowenstein re same (.1);	0.30	\$270.00
9/13/2024	Jesse Bair	Review A. Castro memo re demand letter requirements under California law (.1);	0.10	\$90.00
9/13/2024	Jesse Bair	Review the debtor's discovery deficiency letter to the insurers (.1);	0.10	\$90.00
9/14/2024	Jesse Bair	Review correspondence from the debtor re the insurers' discovery productions and meet and confer to discuss case discovery plan (.1);	0.10	\$90.00
9/15/2024	Jesse Bair	Review B. Wiesenbergs correspondence re stay relief issues and upcoming Committee meeting (.1);	0.10	\$90.00
9/15/2024	Timothy Burns	Review correspondence with Lowenstein and the Committee re mediation meeting (.1);	0.10	\$112.00

9/16/2024	Katie Sticklen	Research re Trustee issues in connection with Plans incorporating post-confirmation insurance litigation structure (1.2);	1.20	\$564.00
9/16/2024	Jesse Bair	Review correspondence with the debtor and insurers re meet and confer re case discovery plan (.1);	0.10	\$90.00
9/16/2024	Alexander Castro	Participate in conference with J. Bair and N. Kuenzi re insurance analysis needed in connection with RCBO school claims (.3);	0.30	\$141.00
9/16/2024	Alexander Castro	Research California case law re personal exposure requirement for bad faith liability in context of insolvent policyholder (1.1);	1.10	\$517.00
9/16/2024	Alexander Castro	Discuss new California research project on bad faith failure to settle after assignment with T. Burns (.1);	0.10	\$47.00
9/16/2024	Nathan Kuenzi	Participate in conference with J. Bair and A. Castro re insurance analysis needed in connection with RCBO school claims (.3);	0.30	\$165.00
9/16/2024	Morgan Stippel	Participate in additional meeting with T. Burns re research project re Cal. Ins. Code Section 11580 and claims splitting (.2);	0.20	\$110.00
9/16/2024	Timothy Burns	Participate in conference with J. Bair re Committee insurance strategy and potential response to debtor's term sheet (.2);	0.20	\$224.00
9/16/2024	Jesse Bair	Review claim information re claims that name schools as defendants in connection with potential case insurance strategy (.4); analysis re scope of coverage for particular schools under debtor insurance policies (.3); provide instructions to BB team re additional analysis needed in connection with same (.3);	1.00	\$900.00
9/16/2024	Alexander Castro	Research insured status of particular schools and claim information re same in connection with potential insurance strategy (1.6);	1.60	\$752.00
9/16/2024	Timothy Burns	Prepare for additional meeting with M. Stippel re research project re Cal. Ins. Code Section 11580 and claims splitting (.2); participate in conference with M. Stippel re same (.2);	0.40	\$448.00
9/16/2024	Jesse Bair	Participate in conference with T. Burns re Committee insurance and settlement strategy in connection with potential response to the debtor's term sheet (.2);	0.20	\$180.00
9/16/2024	Brian Cawley	Research case law re ripeness of bad faith failure to settle claim for purposes of assignment (.2);	0.20	\$110.00
9/16/2024	Nathan Kuenzi	Review preliminary claims analysis regarding RCBO schools (.4);	0.40	\$220.00

9/16/2024	Timothy Burns	Prepare for meeting with associates re research assignments re plan and insurance strategy issues (.2); meet with B. Cawley re same (.1); meet with A. Castro re same (.1); meet with K. Sticklen re same (.1);	0.50	\$560.00
9/16/2024	Morgan Stippel	Begin legal research re Cal. Ins. Code Section 11580 and claims splitting (5.3);	5.30	\$2,915.00
9/17/2024	Timothy Burns	Participate in meet and confer with the debtor and the insurers re joint discovery plan (.4); participate in call with J. Bair re same (.1);	0.50	\$560.00
9/17/2024	Nathan Kuenzi	Analyze TNCRRG policies relating to additional named insureds/school coverage (.3);	0.30	\$165.00
9/17/2024	Jesse Bair	Review T. Burns email memo re outcome of discovery meet and confer with the debtor and insurers (.1); participate in call with T. Burns re same and next-steps (.1);	0.20	\$180.00
9/17/2024	Morgan Stippel	Continue detailed legal research re Cal. Ins. Code Section 11580 and claims splitting (5.2);	5.20	\$2,860.00
9/17/2024	Timothy Burns	Review and revise draft discovery plan (.5);	0.50	\$560.00
9/17/2024	Timothy Burns	Participate in call with B. Weisenberg re state court counsel meeting and revised insurance strategy presentation (.2);	0.20	\$224.00
9/17/2024	Timothy Burns	Prepare revised insurance strategy presentation for upcoming state court counsel meeting (2.2);	2.20	\$2,464.00
9/17/2024	Brian Cawley	Research re particular assignment and covenant not to execute settlement structure with cash payment (1.3); begin drafting memo re same (1.6);	2.90	\$1,595.00
9/17/2024	Alexander Castro	Continue analyzing insurance issues re RCBO schools claims in connection with potential insurance strategy (1.2);	1.20	\$564.00
9/17/2024	Jesse Bair	Draft the Committee's inserts to the proposed case discovery plan (.3); review and incorporate T. Burns' suggested changes to same (.1); correspondence with the debtor and insurers re same (.1);	0.50	\$450.00
9/17/2024	Jesse Bair	Review draft Committee response to the debtor's term sheet (.1);	0.10	\$90.00
9/17/2024	Jesse Bair	Review correspondence with the debtor and insurers re answer extension and extension to file case discovery plan (.1);	0.10	\$90.00
9/17/2024	Timothy Burns	Review and revise Committee correspondence to the mediator re Committee counter (.2);	0.20	\$224.00
9/17/2024	Timothy Burns	Review Chubb correspondence re extension re insurance discovery plan (.1);	0.10	\$112.00

9/18/2024	Morgan Stippel	Draft memorandum summarizing summarizing legal research re Cal. Ins. Code Section 11580 and claims splitting (1.6);	1.60	\$880.00
9/18/2024	Brian Cawley	Continue drafting and researching for memo on assignment and covenant issues and send to T. Burns for review (5.1);	5.10	\$2,805.00
9/18/2024	Nathan Kuenzi	Continue analyzing TNCRRG policies relating to additional named insureds/school coverage (1.4);	1.40	\$770.00
9/18/2024	Timothy Burns	Review debtor letter to the insurers re discovery disputes (.2);	0.20	\$224.00
9/18/2024	Nathan Kuenzi	Review coverage correspondence re additional named insured defenses (.8);	0.80	\$440.00
9/18/2024	Timothy Burns	Review mediation materials from Debtor re property valuation and insurance issues (.2);	0.20	\$224.00
9/18/2024	Morgan Stippel	Supplemental legal research re Cal. Ins. Code Section 11580 and claims splitting (1.0); complete drafting memo summarizing same (1.7);	2.70	\$1,485.00
9/18/2024	Nathan Kuenzi	Supplemental analysis of RCBO school claims in connection with potential insurance strategy (.6);	0.60	\$330.00
9/19/2024	Brian Cawley	Revise and supplement draft insurance presentation and coverage chart exhibits (4.3);	4.30	\$2,365.00
9/19/2024	Nathan Kuenzi	Review complaints filed by RCBO against insurers in adversary proceedings (.4);	0.40	\$220.00
9/19/2024	Brian Cawley	Discuss insurance presentation project with T. Burns (.2);	0.20	\$110.00
9/19/2024	Timothy Burns	Participate in conference with B. Cawley re insurance presentation (.2);	0.20	\$224.00
9/19/2024	Timothy Burns	Review and revise B. Cawley's memo re bad faith assignments (.2); review and revise A. Castro memo re timing of assignments (.3);	0.50	\$560.00
9/19/2024	Timothy Burns	Participate in call with the debtor re case mediation issues (.6);	0.60	\$672.00
9/19/2024	Jesse Bair	Review B. Cawley memo re insurance assignments and covenants not to execute (.1);	0.10	\$90.00
9/19/2024	Jesse Bair	Review revised draft of potential Committee response to the debtor's term sheet (.1);	0.10	\$90.00
9/19/2024	Nathan Kuenzi	Continue analyzing RCBO policies in connection with additional named insureds/school coverage and edit chart summarizing same (1.5);	1.50	\$825.00

9/19/2024	Alexander Castro	Finalize summary chart re insurance coverage in connection with RCBO school claims (1.7);	1.70	\$799.00
9/20/2024	Jesse Bair	Review the insurers' draft inserts to the case discovery plan (.3);	0.30	\$270.00
9/20/2024	Timothy Burns	Review B. Cawley's proposed edits to the draft insurance presentation (.2);	0.20	\$224.00
9/20/2024	Jesse Bair	Review Westport's joinder re certain insurers' discovery requests and related correspondence re same (.1);	0.10	\$90.00
9/20/2024	Jesse Bair	Review draft extension and proposed order extending the insurers' time to answer fourth amended complaint (.1);	0.10	\$90.00
9/20/2024	Jesse Bair	Participate in conference with T. Burns re outcome of Committee meeting re ongoing mediation negotiations (.1);	0.10	\$90.00
9/20/2024	Timothy Burns	Participate in call with J. Bair re outcome of Committee meeting re ongoing mediation negotiations (.1); participate in call with B. Weisenberg re same (.1);	0.20	\$224.00
9/21/2024	Jesse Bair	Review final version of the Committee's response to the debtor's term sheet and related correspondence with the mediator (.1);	0.10	\$90.00
9/23/2024	Jesse Bair	Participate in BB team conference re case developments and upcoming insurance presentation to state court counsel (.1);	0.10	\$90.00
9/23/2024	Katie Sticklen	Analyze and compare the debtor's 4th Amended Complaint with the Committee's proposed 4th Amended Complaint (.8);	0.80	\$376.00
9/23/2024	Jesse Bair	Review correspondence with the debtor and mediator re upcoming mediation sessions (.1);	0.10	\$90.00
9/23/2024	Nathan Kuenzi	Participate in BB team meeting re case developments and ongoing insurance projects (.1);	0.10	\$55.00
9/23/2024	Brian Cawley	Implement partner revisions into insurance presentation for upcoming state court counsel meeting (1.3);	1.30	\$715.00
9/23/2024	Timothy Burns	Participate in BB team meeting re case developments and related insurance projects (.1);	0.10	\$112.00
9/23/2024	Jesse Bair	Begin preparing for upcoming state court counsel meeting re insurance strategy and potential Plan structures (.1);	0.10	\$90.00
9/24/2024	Katie Sticklen	Complete drafting summary re differences between the debtor's 4th Amended Complaint and the Committee's proposed 4th Amended Complaint (1.9);	1.90	\$893.00

9/24/2024	Jesse Bair	Preliminary review re insurance issues in connection with school cases (.1); correspond with B. Wiesenbergs re same (.1);	0.20	\$180.00
9/24/2024	Timothy Burns	Review correspondence with the insurers and the debtor re case discovery plan (.2);	0.20	\$224.00
9/24/2024	Timothy Burns	Participate in call with B. Weisenberg re mediation issues (.2); participate in call with state court counsel re same (.2); participate in call with J. Bair re mediation next-steps (.1);	0.50	\$560.00
9/24/2024	Jesse Bair	Review correspondence with the debtor and insurers re approval of complaint extension stipulation and order (.1);	0.10	\$90.00
9/24/2024	Jesse Bair	Participate in conference with T. Burns re insurance mediation next-steps (.1);	0.10	\$90.00
9/24/2024	Timothy Burns	Review and revise insurance presentation for state court counsel (.6);	0.60	\$672.00
9/24/2024	Timothy Burns	Review draft papers re extension for insurers to answer in insurance adversary (.1);	0.10	\$112.00
9/25/2024	Timothy Burns	Review BB's edits to draft Discovery Plan (.1);	0.10	\$112.00
9/25/2024	Timothy Burns	Review insurers' edits to draft discovery plan (.2); review RCBO's edits to draft discovery plan (.2); correspond with J. Bair and N. Kuenzi re same (.1);	0.50	\$560.00
9/25/2024	Jesse Bair	Review the debtor's and insurers' additional inserts to the insurance discovery Plan (.2); correspond with T. Burns re same and potential Committee edits (.1); draft further Committee additions to same (.2); review additional, supplemental inserts from the debtor and insurers (.2); review and respond to correspondence with the debtor and insurers re same (.1);	0.80	\$720.00
9/25/2024	Timothy Burns	Review correspondence with J. Bair and Lowenstein re coverage issues related to RCBO schools (.1);	0.10	\$112.00
9/25/2024	Timothy Burns	Review M. Stippel's memo re Cal. Ins. Code Section 11580 and claim splitting issues (.2);	0.20	\$224.00
9/25/2024	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$90.00
9/25/2024	Timothy Burns	Review revised version of draft insurance discovery plan (.1);	0.10	\$112.00
9/25/2024	Timothy Burns	Correspond with B. Weisenberg re upcoming state court counsel meeting (.1);	0.10	\$112.00

9/25/2024	Jesse Bair	Review assessment re potential School test cases (.4); supplemental review re additional insured coverage under RCBO policies (.2); review and respond to B. Wiesenbergs correspondence re same (.1);	0.70	\$630.00
9/26/2024	Timothy Burns	Participate in follow-up meeting with particular state court counsel re insurance presentation (1.0);	1.00	\$1,120.00
9/26/2024	Timothy Burns	Participate in call with B. Weisenberg re state court counsel insurance meeting (.2);	0.20	\$224.00
9/26/2024	Alexander Castro	Supplemental research re additional insured issues under RCBO policies (1.8);	1.80	\$846.00
9/26/2024	Morgan Stippel	Correspond with T. Burns re legal research re post-loss assignment (.2);	0.20	\$110.00
9/26/2024	Timothy Burns	Prepare for state court counsel insurance strategy meeting (1.6);	1.60	\$1,792.00
9/27/2024	Jesse Bair	Review correspondence from debtor re Committee intervention in American Home action (.1); analysis re same and correspond with BB team re next-steps for Committee intervention (.2);	0.30	\$270.00
9/27/2024	Jesse Bair	Complete analysis of additional insured coverage as to various schools (.5); review and respond to correspondence with Committee professionals and state court counsel re same (.2);	0.70	\$630.00
9/27/2024	Nathan Kuenzi	Prepare for upcoming mediation session, including review of research re potential Plan structures (.8);	0.80	\$440.00
9/27/2024	Nathan Kuenzi	Analysis re American Home intervention and consolidation issues (.7); correspond with T. Burns and J. Bair re same (.2);	0.90	\$495.00
9/27/2024	Timothy Burns	Review spreadsheet re RCBO school claims (.1); review correspondence with J. Bair and Lowenstein re insurance issues re same (.1);	0.20	\$224.00
9/27/2024	Timothy Burns	Review correspondence with debtor re American Home intervention and consolidation issue (.1);	0.10	\$112.00
9/28/2024	Timothy Burns	Review motion re survivor statements and correspondence with Lowenstein re same (.2);	0.20	\$224.00
9/28/2024	Timothy Burns	Correspond with N. Kuenzi re mediation (.1);	0.10	\$112.00
9/28/2024	Timothy Burns	Review and revise CMC in insurance adversary (.3); correspond with Lowenstein and internal team re same (.1.);	0.40	\$448.00
9/28/2024	Timothy Burns	Correspond with N. Kuenzi re assignments re American Home adversary matter (.2); additional correspondence with J. Bair and N. Kuenzi re same (.1);	0.30	\$336.00

9/28/2024	Timothy Burns	Review correspondence with J. Bair and state court counsel re coverage for schools (.1);	0.10	\$112.00
9/28/2024	Jesse Bair	Review and respond to additional correspondence with BB team re Committee intervention in the American Home adversary proceeding (.1);	0.10	\$90.00
9/29/2024	Jesse Bair	Review correspondence with the insurers and debtor re potential additional revisions to the Fourth Amended Complaint (.1);	0.10	\$90.00
9/29/2024	Jesse Bair	Review the debtor's draft insurance case management statement (.1); review T. Burns' suggested edits to same (.1); review correspondence with T. Burns and B. Wiesenberg re same (.1);	0.30	\$270.00
9/29/2024	Jesse Bair	Review correspondence with Committee professionals re insurance mediation session (.1);	0.10	\$90.00
9/29/2024	Brian Cawley	Supplement memo re Chubb unfair claims handling with material from Bishop of Orange case (.1);	0.10	\$55.00
9/29/2024	Nathan Kuenzi	Review motion to intervene and draft emails to counsel regarding issues with American Home action (.8);	0.80	\$440.00
9/29/2024	Nathan Kuenzi	Draft revised Committee version of insurance case management statement (.5);	0.50	\$275.00
9/30/2024	Nathan Kuenzi	Draft email to B. Weisenberg and J. Prol regarding American Home intervention motion and next steps (.2);	0.20	\$110.00
9/30/2024	Alexander Castro	Analyze case law re Clergy-1 decision (1.1);	1.10	\$517.00
9/30/2024	Alexander Castro	Draft summary re Clargy-1 decision (1.4);	1.40	\$658.00
9/30/2024	Nathan Kuenzi	Prepare for upcoming mediation (.1);	0.10	\$55.00
9/30/2024	Alexander Castro	Analyze case law re stay relief issues (1.5);	1.50	\$705.00
9/30/2024	Nathan Kuenzi	Participate in conference with T. Burns re outcome of mediation session (.1);	0.10	\$55.00
9/30/2024	Timothy Burns	Participate in portion of mediation session (.8); participate in call B. Weisenberg re same (.2); participate in conference with N. Kuenzi re same (.1);	1.10	\$1,232.00
9/30/2024	Nathan Kuenzi	Participate in mediation session with RCBO (2.2);	2.20	\$1,210.00
9/30/2024	Timothy Burns	Review insurers' changes to case management statement in insurance adversary (.2); correspond with N. Kuenzi re same (.1); correspond with debtor re same (.1);	0.40	\$448.00
9/30/2024	Jesse Bair	Review additional edits received from the insurers and debtor to the draft case management statement(.1);	0.10	\$90.00

9/30/2024	Nathan Kuenzi	Draft revised version of CMO to incorporate additional edits from T. Burns (.8);	0.80	\$440.00
9/30/2024	Nathan Kuenzi	Analyze prior rulings and oral argument re insurance intervention (1.1); draft the Committee's motion to intervene in the American Home Adversary Proceeding (2.6);	3.70	\$2,035.00
9/30/2024	Timothy Burns	Review mediator's summary re mediation (.2);	0.20	\$224.00
9/30/2024	Jesse Bair	Review and edit draft Committee intervention motion in the American Home action (.1); correspond with N. Kuenzi re revisions needed to same (.1); research issue re applicability of Section 1109 in district court action in connection with intervention (.2); correspond with N. Kunezi re same (.1);	0.50	\$450.00
9/30/2024	Timothy Burns	Correspond with A. Castro re assignment re Clergy-1 decision (.1);	0.10	\$112.00
<b>Totals for Insurance Recovery Activities</b>			<b>142.40</b>	<b>\$104,466.00</b>

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<b>Total Hours and Fees</b>	<b>156.30</b>	<b>\$118,326.00</b>
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### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/09/2024	Hotel, T. Burns (2 nights)	\$908.80
09/09/2024	Travel meal, T. Burns	\$43.42
09/10/2024	Parking for mediation (J. Bair)	\$84.00
09/10/2024	Meal with T. Burns, J. Bair, B. Weisensberg	\$144.19
09/10/2024	Travel Meal, J. Bair	\$33.94
09/10/2024	Mileage (Madison to Chicago for mediation)	\$206.36
09/10/2024	Illinois Tollway, eight tolls (travel to mediation)	\$15.80
09/11/2024	Travel meal, T. Burns	\$24.59
<b>Total Expenses</b>		<b>\$1,461.10</b>

### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	17.00	\$470.00	\$7,990.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	19.10	\$550.00	\$10,505.00
Jesse Bair	Partner	25.00	\$900.00	\$22,500.00
Karen Dempshi	Paralegal	0.10	\$340.00	\$34.00

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Katie Sticklen	Associate	5.30	\$470.00	\$2,491.00
Morgan Stippel	Associate	22.20	\$550.00	\$12,210.00
Nathan Kuenzi	Associate	22.60	\$550.00	\$12,430.00
Timothy Burns	Partner	44.70	\$1,120.00	\$50,064.00

**Total Due This Invoice: \$119,787.10**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Roman Catholic Bishop of Oakland UCC**

**Issue Date :** 11/26/2024

**Bill # :** 01584

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/10/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes re ongoing mediation issues (.9);	0.90	\$1,008.00
10/17/2024	Nathan Kuenzi	Participate in portion of state court counsel meeting for insurance purposes re the insurers' draft term sheet and related issues (.5);	0.50	\$275.00
10/17/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes re the insurers' draft term sheet and related issues (1.1);	1.10	\$1,232.00
10/29/2024	Jesse Bair	Prepare for state court counsel meeting re ongoing settlement discussions (.1); participate in state court counsel meeting re same for insurance purposes (1.0);	1.10	\$990.00
10/31/2024	Timothy Burns	Participate in state court counsel meeting re mediation developments and next-steps (1.0);	1.00	\$1,120.00
<b>Totals for Committee Meetings</b>			<b>4.60</b>	<b>\$4,625.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/11/2024	Brenda Horn-Edwards	Draft Burns Bair third interim fee application (1.7);	1.70	\$578.00
10/11/2024	Brenda Horn-Edwards	Correspond with J. Bair re Burns Bair third interim fee application (.1);	0.10	\$34.00
10/11/2024	Brenda Horn-Edwards	Draft declaration of S. Woodall in support of Burns Bair third interim fee application (.1);	0.10	\$34.00

10/11/2024	Jesse Bair	Review and edit Burns Bair third interim fee application (1.2); correspond with B. Horn-Edwards re same (.1);	1.30	\$1,170.00
10/11/2024	Brenda Horn-Edwards	Draft exhibits to Burns Bair third interim fee application (1.0);	1.00	\$340.00
10/11/2024	Brenda Horn-Edwards	Correspond with G. Albert re Burns Bair third interim fee application (.1);	0.10	\$34.00
10/11/2024	Brenda Horn-Edwards	Draft declaration of J. Bair in support of Burns Bair third interim fee application (.2); draft Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.40	\$136.00
10/15/2024	Jesse Bair	Edit and finalize Burns Bair second interim fee application and correspond with C. Mitsuoka re same (.2);	0.20	\$180.00
10/16/2024	Brenda Horn-Edwards	Generate LEDES data for fee examiner and email to C. Mitsuoka and G. Albert (.1);	0.10	\$34.00
10/16/2024	Jesse Bair	Review and respond to correspondence with B. Horn-Edwards and local counsel re US Trustee request for LEDEs data and hearing on interim fee applications (.1);	0.10	\$90.00
10/29/2024	Jesse Bair	Review Burns Bair invoice for privilege and confidential information (.9);	0.90	\$810.00
10/29/2024	Jesse Bair	Correspond with B. Horn-Edwards re Burns Bair's monthly fee statement (.1);	0.10	\$90.00
10/30/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
10/30/2024	Jesse Bair	Review and edit Burns Bair's monthly fee statement (.1);	0.10	\$90.00
<b>Totals for Fee Applications</b>			<b>6.50</b>	<b>\$3,722.00</b>

## Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/15/2024	Timothy Burns	Participate in pre-hearing conference with Committee professionals re hearing strategy (.5); participate in hearing re case status conference and survivor statements (1.5); participate in conference with N. Kuenzi re hearing outcome and next-steps (.4); participate in post-hearing conference with Committee professionals re same (.3);	2.70	\$3,024.00
10/15/2024	Nathan Kuenzi	Participate in hearing re case status conference and survivor statements (1.5);	1.50	\$825.00
10/24/2024	Timothy Burns	Participate in supplemental hearing re survivor statements (1.2);	1.20	\$1,344.00
<b>Totals for Hearings</b>			<b>5.40</b>	<b>\$5,193.00</b>

## Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
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10/1/2024	Timothy Burns	Review and revise motion to intervene in the American Home insurance action (.4); correspond with N. Kuenzi re same (.1);	0.50	\$560.00
10/1/2024	Nathan Kuenzi	Participate in Zoom mediation session with the debtor for insurance purposes (1.2);	1.20	\$660.00
10/1/2024	Nathan Kuenzi	Review T. Burns suggested edits to Committee motion to intervene (.2);	0.20	\$110.00
10/1/2024	Nathan Kuenzi	Draft revisions to Committee motion to intervene in the American Home action to incorporate suggested changes from T. Burns (.8);	0.80	\$440.00
10/1/2024	Jesse Bair	Correspond with T. Burns re strategy for upcoming insurance status conference (.1);	0.10	\$90.00
10/1/2024	Jesse Bair	Review correspondence with the debtor and mediators re insurance mediation session (.1);	0.10	\$90.00
10/2/2024	Nathan Kuenzi	Review debtor discovery plan in the district court insurance action in preparation for upcoming hearing (.4);	0.40	\$220.00
10/2/2024	Nathan Kuenzi	Correspond with the debtor re request for consent re Committee intervention in American Home insurance action (.2); review and respond to correspondence with the debtor re same (.2);	0.40	\$220.00
10/2/2024	Karen Dempski	Docket/calendar upcoming status conference (.1);	0.10	\$34.00
10/2/2024	Nathan Kuenzi	Review and edit N. Kuenzi pro hac vice application and notice of appearances (.2);	0.20	\$110.00
10/2/2024	Karen Dempski	Draft applications for admission pro hac vice for N. Kuenzi (.4); order certificate of good standing (1); correspond with N. Kuenzi re same (.1);	0.60	\$204.00
10/2/2024	Alexander Castro	Draft summary re case law re stay relief issues (1.9);	1.90	\$893.00
10/2/2024	Jesse Bair	Review correspondence with B. Wiesenber and the debtor re insurance Plan issues in connection with upcoming insurance mediation (.1);	0.10	\$90.00
10/2/2024	Nathan Kuenzi	Draft revisions to Motion to Intervene following debtor consent (.2);	0.20	\$110.00
10/2/2024	Jesse Bair	Review minute order re outcome of insurance status conference and pre-trial Order No. 3 (.1); review correspondence with B. Wiesenber re same (.1);	0.20	\$180.00
10/3/2024	Timothy Burns	Review A. Castro memo re California mediation decision and Northern District lift stay case law (.2);	0.20	\$224.00
10/3/2024	Timothy Burns	Review order following case management conference in insurance adversary (.1);	0.10	\$112.00
10/3/2024	Timothy Burns	Review status conference notice in main case (.1);	0.10	\$112.00

10/3/2024	Timothy Burns	Review correspondence with state court counsel and spreadsheet re school claims (.1);	0.10	\$112.00
10/3/2024	Timothy Burns	Develop insurance agenda for upcoming mediation session (.4); correspond with the debtor re same (.3);	0.70	\$784.00
10/4/2024	Alexander Castro	Review recent materials and update memo re Chubb unfair claims handling practices (.6);	0.60	\$282.00
10/4/2024	Nathan Kuenzi	Review insurers' letter regarding request for access to unredacted proofs of claim (.2);	0.20	\$110.00
10/4/2024	Jesse Bair	Review correspondence with the insurers, mediators, and Committee professionals re insurance mediation session (.1);	0.10	\$90.00
10/5/2024	Timothy Burns	Review and respond to insurers' and Committee professionals' letters and emails re unredacted proofs of claims (.2);	0.20	\$224.00
10/5/2024	Timothy Burns	Review correspondence with Committee professionals and state court counsel re upcoming mediation session (.1);	0.10	\$112.00
10/5/2024	Jesse Bair	Review letter from the insurers re use of unredacted proof of claim by insurer experts and correspondence with Committee professionals re response to same (.1);	0.10	\$90.00
10/5/2024	Timothy Burns	Review correspondence with the Committee and Committee professionals re Survivor Conference Statements (.1);	0.10	\$112.00
10/7/2024	Jesse Bair	Review correspondence with Lowenstein and the debtor re call to discuss insurance mediation issues (.1);	0.10	\$90.00
10/7/2024	Jesse Bair	Participate in conference with T. Burns re ongoing insurance mediation issues (.2);	0.20	\$180.00
10/7/2024	Timothy Burns	Participate in conference with J. Bair re ongoing insurance mediation issues (.2);	0.20	\$224.00
10/7/2024	Karen Dempski	Finalize and file pro hac vice applications for N. Kuenzi in both the bankruptcy case and district court insurance action (.4);	0.40	\$136.00
10/7/2024	Timothy Burns	Review Committee filings re survivor statements (.1);	0.10	\$112.00
10/8/2024	Jesse Bair	Review N. Kuenzi email memo re outcome of most recent mediation session (.2);	0.20	\$180.00
10/8/2024	Timothy Burns	Participate in call with the debtor and Committee professionals re insurance mediation issues (1.0);	1.00	\$1,120.00
10/8/2024	Timothy Burns	Prepare for meeting with the debtor by reviewing N. Kuenzi memo re recent mediation session (.2);	0.20	\$224.00
10/8/2024	Nathan Kuenzi	Analyze CNA correspondence re potential additional insurer motion to dismiss (.3);	0.30	\$165.00

10/8/2024	Timothy Burns	Continue preparing for call with the debtor re insurance mediation issues (.4);	0.40	\$448.00
10/8/2024	Jesse Bair	Prepare for call with the debtor re insurance mediation issues (.1); participate in call with the debtor and Committee professionals re insurance mediation issues (1.0);	1.10	\$990.00
10/8/2024	Timothy Burns	Review additional correspondence with the debtor and Committee professionals re insurer request for unredacted POCs (.1);	0.10	\$112.00
10/8/2024	Nathan Kuenzi	Participate in call with the debtor and Committee professionals re insurance mediation issues (1.0);	1.00	\$550.00
10/9/2024	Alexander Castro	Participate in conference with T. Burns and N. Kuenzi re research projects in connection with responding to CNA's supplemental motion to dismiss arguments (.2);	0.20	\$94.00
10/9/2024	Nathan Kuenzi	Participate in conference with T. Burns and A. Castro re research projects in connection with responding to CNA's supplemental motion to dismiss arguments (.2);	0.20	\$110.00
10/9/2024	Jesse Bair	Participate in call with Lowenstein re insurance mediation developments and potential amended complaint issues in the insurance district court action (.4);	0.40	\$360.00
10/9/2024	Nathan Kuenzi	Analyze issues raised in A. Castro research re Fox Paine case and exhaustion issues related to CNA excess policies (.8);	0.80	\$440.00
10/9/2024	Nathan Kuenzi	Research issues re duty to indemnify and ripeness of declaratory judgment actions in California (1.2);	1.20	\$660.00
10/9/2024	Timothy Burns	Review B. Weisenberg correspondence re mediation issues (.1);	0.10	\$112.00
10/9/2024	Alexander Castro	Draft memo summarizing key caselaw on declaratory judgment on duty to indemnify in response to CNA correspondence re potential additional motion to dismiss (1.2);	1.20	\$564.00
10/9/2024	Alexander Castro	Research CNA argument and caselaw re declaratory judgment on duty to indemnify for memo (2.0);	2.00	\$940.00
10/9/2024	Alexander Castro	Research counterarguments and contrary caselaw to CNA argument on declaratory judgment on duty to indemnify (1.9);	1.90	\$893.00
10/9/2024	Timothy Burns	Review correspondence from CNA re motion to dismiss meet and confer (.1); participate in conference with A. Castro and N. Kuenzi re research assignment re same (.2);	0.30	\$336.00

10/9/2024	Alexander Castro	Research CNA arguments and caselaw on actual exhaustion of underlying limits requirement in connection with potential additional motion to dismiss (1.4);	1.40	\$658.00
10/10/2024	Jesse Bair	Correspond with G. Albert and B. Horn-Edwards re interim fee applications (.1);	0.10	\$90.00
10/10/2024	Jesse Bair	Review correspondence with B. Wiesenbergs and Stout re additional insured issues and school cases (.1); participate in conference with T. Burns re insurance mediation issues (.1);	0.20	\$180.00
10/10/2024	Jesse Bair	Participate in meet and confer with the insurers and debtor re purported complaint deficiencies and potential narrowing of coverage action (.5);	0.50	\$450.00
10/10/2024	Jesse Bair	Review correspondence and case law sent by the insurers supporting purported dismissal of fifth amended complaint (.3);	0.30	\$270.00
10/10/2024	Jesse Bair	Prepare for meet and confer with the insurers and debtor re purported complaint deficiencies, including review of transcript of prior motion to dismiss hearing and drafting outline of potential responses to the insurers' renewed motion to dismiss arguments (.5)	0.50	\$450.00
10/10/2024	Alexander Castro	Draft memo on actual exhaustion of underlying limits requirement for ripe declaratory relief (.5);	0.50	\$235.00
10/10/2024	Timothy Burns	Review and revise A. Castro's memo re insurers' ripeness case law for meet and confer (.3);	0.30	\$336.00
10/10/2024	Nathan Kuenzi	Prepare for meet and confer with the debtor and insurers, including review of A. Castro memo and case law cited therein (.3);	0.30	\$165.00
10/10/2024	Nathan Kuenzi	Participate in meet and confer with the insurers and debtor re purported complaint deficiencies and potential narrowing of coverage action (.5);	0.50	\$275.00
10/10/2024	Alexander Castro	Conduct additional research on ripeness of declaratory judgment on duty to indemnify based on T. Burns feedback and revise memo accordingly (.9);	0.90	\$423.00
10/10/2024	Jesse Bair	Correspond with American Home re Committee intervention issues (.1);	0.10	\$90.00
10/10/2024	Alexander Castro	Continue researching caselaw re actual exhaustion of underlying limit requirement for ripe declaratory judgment (.6);	0.60	\$282.00

10/10/2024	Timothy Burns	Participate in follow up call with B. Weisenberg re state court counsel meeting re mediation issues (.2); participate in conference with J. Bair re insurance mediation issues (.1);	0.30	\$336.00
10/11/2024	Jesse Bair	Begin reviewing the insurers' draft term sheet (.3);	0.30	\$270.00
10/11/2024	Alexander Castro	Participate in conference with J. Bair re project re potential narrowing of insurance complaint and identification of all ripe coverage issues (.2);	0.20	\$94.00
10/11/2024	Alexander Castro	Analyze current iteration of insurance complaint and assess all presently ripe coverage issues (2.9);	2.90	\$1,363.00
10/11/2024	Jesse Bair	Provide instructions to A. Castro re analysis needed of all ripe issues in the insurance adversary proceeding (.2);	0.20	\$180.00
10/11/2024	Jesse Bair	Review the debtor's status conference statement (.1);	0.10	\$90.00
10/11/2024	Timothy Burns	Review American Home stipulation re complaint (.1);	0.10	\$112.00
10/12/2024	Jesse Bair	Review the insurers' status conference statement (.1); correspond with Committee professionals re same (.1); participate in conference with T. Burns re same, upcoming mediation, and insurance DJ action (.1);	0.30	\$270.00
10/12/2024	Timothy Burns	Review the insurers' status conference statement (.1); review the debtor's status conference statement (.1); correspond with Committee professionals re same (.1);	0.30	\$336.00
10/12/2024	Timothy Burns	Participate in conference with J. Bair re case status, developments, and related insurance projects (.1);	0.10	\$112.00
10/12/2024	Timothy Burns	Participate in conference with J. Bair re upcoming mediation and insurance DJ action (.1);	0.10	\$112.00
10/12/2024	Timothy Burns	Review correspondence with the insurers re protective orders (.2);	0.20	\$224.00
10/12/2024	Jesse Bair	Participate in conference with T. Burns re case status, developments, and related insurance projects (.1);	0.10	\$90.00
10/12/2024	Timothy Burns	Correspond with N. Kuenzi re case insurance assignments (.1);	0.10	\$112.00
10/13/2024	Timothy Burns	Review correspondence with the Committee professionals, Debtor, and insurers re protective order issues and insurance mediation (.2);	0.20	\$224.00
10/14/2024	Timothy Burns	First detailed review of the insurers' proposed term sheet (.8);	0.80	\$896.00

10/14/2024	Jesse Bair	Review K. Sticklen memo re Trustee issues in connection with post-confirmation insurance litigation (.1);	0.10	\$90.00
10/14/2024	Jesse Bair	Review B. Cawley research memo re assignments and covenants not to execute under Hamilton (.1);	0.10	\$90.00
10/14/2024	Timothy Burns	Second detailed review of the insurers' proposed term sheet (.8);	0.80	\$896.00
10/14/2024	Jesse Bair	Review A. Castro research memo re insurance demand letter and assignment issues (.1);	0.10	\$90.00
10/14/2024	Alexander Castro	Draft memo assessing all presently ripe coverage issues in the insurance coverage action (1.8);	1.80	\$846.00
10/14/2024	Jesse Bair	Review correspondence re upcoming mediation sessions (.1);	0.10	\$90.00
10/14/2024	Timothy Burns	Review LMI's limited objection to survivor statement motion (.1); correspond with Committee professionals re same (.1);	0.20	\$224.00
10/14/2024	Timothy Burns	Review and respond to correspondence with Lowenstein and BRG re mediation issues (.1);	0.10	\$112.00
10/14/2024	Jesse Bair	Further review of the insurers' proposed term sheet (.3); participate in call with T. Burns re same and potential Committee response (.4);	0.70	\$630.00
10/14/2024	Alexander Castro	Begin drafting PowerPoint presentation re insurance demand letter issues (2.4);	2.40	\$1,128.00
10/14/2024	Timothy Burns	Participate in call with state court counsel re mediation issues and upcoming session (.4);	0.40	\$448.00
10/14/2024	Timothy Burns	Participate in call with J. Bair re the insurers' proposed term sheet and potential Committee response to same (.4);	0.40	\$448.00
10/14/2024	Nathan Kuenzi	Outline presentation re the Insurers' proposed Term Sheet for state court counsel (.4);	0.40	\$220.00
10/14/2024	Nathan Kuenzi	Draft outline re Committee presentation re insurance demand letters (.3);	0.30	\$165.00
10/14/2024	Timothy Burns	Review and respond to correspondence with N. Kuenzi re presentation assignment re mediation (.2);	0.20	\$224.00
10/14/2024	Timothy Burns	Additional correspondence with N. Kuenzi re presentation re insurance mediation issues (.2);	0.20	\$224.00
10/15/2024	Alexander Castro	Review case law re requirements for reasonable insurance demand letters in connection with preparing Committee presentation re same (.9);	0.90	\$423.00

10/15/2024	Timothy Burns	Correspond with the mediators re insurance mediation issues (.1); participate in call with the mediator re same (.4);	0.50	\$560.00
10/15/2024	Timothy Burns	Review correspondence with B. Weisenberg and the Committee re survivor statement hearing outcome (.1); correspond with Committee professionals re recent call with the mediator (.2);	0.30	\$336.00
10/15/2024	Nathan Kuenzi	Participate in conference with T. Burns re hearing outcome re case status conference and survivor statements and next-steps (.4);	0.40	\$220.00
10/15/2024	Timothy Burns	Participate in call with J. Bair re the insurers' proposed term sheet and call with the mediator re same (.2);	0.20	\$224.00
10/15/2024	Timothy Burns	Prepare for hearing re case status conference and survivor statements (1.2);	1.20	\$1,344.00
10/15/2024	Timothy Burns	Review Debtor's statement in support of survivor statements (.1);	0.10	\$112.00
10/15/2024	Nathan Kuenzi	Review T. Burns memo re recent call with the mediator in preparation for upcoming mediation session (.3);	0.30	\$165.00
10/15/2024	Nathan Kuenzi	Draft presentation re the Insurers' proposed term sheet and potential structure of Plan (1.2);	1.20	\$660.00
10/15/2024	Jesse Bair	Participate in call with T. Burns re the insurers' proposed term sheet and call with the mediator re same (.2);	0.20	\$180.00
10/15/2024	Alexander Castro	Continue drafting PowerPoint re insurance demand letters issues (2.1);	2.10	\$987.00
10/15/2024	Jesse Bair	Review Chubb's objection to the Committee's survivor statement motion (.1);	0.10	\$90.00
10/15/2024	Nathan Kuenzi	Analyze Insurer term sheet and aspects of "insurance neutrality" positions that may affect survivor rights post-confirmation (2.4);	2.40	\$1,320.00
10/15/2024	Jesse Bair	Review B. Wiesenberg correspondence re outcome of hearing re survivor statements and next-steps in light of same (.1); participate in call with T. Burns re same (.1);	0.20	\$180.00
10/15/2024	Timothy Burns	Participate in call with J. Bair re outcome of hearing re case status conference and survivor statements (.1);	0.10	\$112.00
10/16/2024	Nathan Kuenzi	Participate in conference with T. Burns re insurance strategy for upcoming mediation session (.2); participate in full-day mediation session for insurance purposes (6.7);	6.90	\$3,795.00
10/16/2024	Alexander Castro	Finish drafting presentation re insurance demand letter issues (1.9);	1.90	\$893.00

10/16/2024	Timothy Burns	Participate in conference with N. Kuenzi re insurance strategy for upcoming mediation session (.2);	0.20	\$224.00
10/16/2024	Timothy Burns	Participate in full-day mediation session for insurance purposes (6.7); participate in conference with J. Bair re outcome of same and next-steps (.2);	6.90	\$7,728.00
10/16/2024	Jesse Bair	Participate in call with T. Burns re outcome of day 1 of mediation session and action items in response to same (.2);	0.20	\$180.00
10/16/2024	Karen DempSKI	Docket/calendar interim fee application hearing (.1);	0.10	\$34.00
10/16/2024	Jesse Bair	Review correspondence with state court counsel and Committee professionals re the insurers' proposed term sheet and potential Committee response to same (.2);	0.20	\$180.00
10/16/2024	Jesse Bair	Brief review re the debtor's suggested edits to the insurers' term sheet (.1);	0.10	\$90.00
10/17/2024	Jesse Bair	Review draft stipulation re extension of time for insurers to answer fifth amended complaint and correspond with B. WiesenberG re same (.1);	0.10	\$90.00
10/17/2024	Timothy Burns	Prepare for insurance mediation presentation to state court counsel (.7);	0.70	\$784.00
10/17/2024	Nathan Kuenzi	Participate in day 2 of mediation session for insurance purposes (5.7);	5.70	\$3,135.00
10/17/2024	Jesse Bair	Review correspondence with the mediators and Committee professionals re upcoming insurance mediation session (.1);	0.10	\$90.00
10/17/2024	Timothy Burns	Participate in day 2 of mediation session for insurance purposes (5.7); participate in call with J. Bair re outcome of mediation session and issues re the insurers' proposed term sheet (.1);	5.80	\$6,496.00
10/17/2024	Alexander Castro	Research California law re impact of policyholder's lack of cooperation on Section 11580 claimant coverage rights (2.7);	2.70	\$1,269.00
10/17/2024	Jesse Bair	Participate in call with T. Burns re outcome of mediation session and state court counsel meeting re insurers' proposed term sheet (.1);	0.10	\$90.00
10/17/2024	Alexander Castro	Analyze insurance neutrality and assignment language from other confirmed Plans to inform potential edits to the insurers' draft term sheet (2.5); correspond with N. Kuenzi re same (.1);	2.60	\$1,222.00
10/18/2024	Alexander Castro	Draft revised version of Committee presentation re insurance demand letters to incorporate suggested edits from T. Burns (1.1);	1.10	\$517.00

10/18/2024	Timothy Burns	Review insurers' edits to proposed confidentiality order (.1);	0.10	\$112.00
10/18/2024	Timothy Burns	Review A. Castro research memo re cooperation clause issues (.2);	0.20	\$224.00
10/18/2024	Nathan Kuenzi	Detailed analysis of language in confirmed Plans re insurance neutrality and assignment provisions, among others, in connection with preparing revised insurance term sheet (2.8);	2.80	\$1,540.00
10/18/2024	Nathan Kuenzi	Begin drafting the Committee's response term sheet re Plan insurance issues (2.4);	2.40	\$1,320.00
10/18/2024	Timothy Burns	Review and revise insurance demand letter presentation (.4);	0.40	\$448.00
10/18/2024	Timothy Burns	Review and respond re stipulation re Fifth Amended Complaint (.1);	0.10	\$112.00
10/18/2024	Nathan Kuenzi	Outline first draft of the Committee's revisions to the Insurers' proposed term sheet (.6);	0.60	\$330.00
10/19/2024	Jesse Bair	Review T. Burns correspondence re outcome of call with mediator and upcoming insurance mediation session (.1);	0.10	\$90.00
10/20/2024	Nathan Kuenzi	Continue drafting revised Committee insurance term sheet (2.0);	2.00	\$1,100.00
10/20/2024	Nathan Kuenzi	Continue analyzing language in confirmed Plans re insurance neutrality and assignment provisions, among others, in connection with preparing revised insurance term sheet (1.2);	1.20	\$660.00
10/21/2024	Jesse Bair	Correspond with N. Kuenzi re insurance mediation strategy (.1);	0.10	\$90.00
10/21/2024	Timothy Burns	Participate in call with state court counsel re insurance mediation issues (.2); participate in call with J. Bair re same (.2); correspond with N. Kuenzi re same (.1);	0.50	\$560.00
10/21/2024	Nathan Kuenzi	Draft email memo to T. Burns and J. Bair summarizing proposed revisions to the insurers' plan term sheet (.5);	0.50	\$275.00
10/21/2024	Nathan Kuenzi	Review filed version of Committee reply in support of survivor statements (.2);	0.20	\$110.00
10/21/2024	Timothy Burns	Review M. Stippel research memo re assignment and duty to cooperate issues in connection with ongoing mediation negotiations (.2);	0.20	\$224.00
10/21/2024	Jesse Bair	Correspond with K. Sticklen re research project re Trustee issues in connection with post-confirmation coverage litigation (.1);	0.10	\$90.00
10/21/2024	Morgan Stippel	Draft email memo to T. Burns summarizing research re viability of assigning insurance policy proceeds to trust without assigning purported policy obligations (1.1);	1.10	\$605.00

10/21/2024	Morgan Stippel	Research and analyze California case law re viability of assigning insurance policy proceeds to trust without assigning purported policy obligations (4.2);	4.20	\$2,310.00
10/21/2024	Timothy Burns	Participate in call with J. Bair re LA Diocese settlement and potential impact on Oakland (.2);	0.20	\$224.00
10/21/2024	Katie Sticklen	Additional research re Trustee issues in connection with Plans incorporating post-confirmation insurance litigation structure (2.5); draft email memo summarizing same (.6);	3.10	\$1,457.00
10/21/2024	Jesse Bair	Participate in BB team conference re case developments, mediation issues, and related insurance assignments needed in connection with same (.4);	0.40	\$360.00
10/21/2024	Nathan Kuenzi	Brief analysis of issues regarding insurance companies' proposed setoff in Term Sheet (.3);	0.30	\$165.00
10/21/2024	Timothy Burns	Review order adding RCWA to mediation (.1);	0.10	\$112.00
10/21/2024	Jesse Bair	Participate in additional conference with T. Burns re continued negotiations of the insurers' term sheet (.2);	0.20	\$180.00
10/21/2024	Karin Jonch-Clausen	Research case law re setoffs in the trust distribution plus court judgment context in connection with ongoing term sheet negotiations (2.3);	2.30	\$1,265.00
10/21/2024	Jesse Bair	Participate in call with T. Burns re LA Diocese settlement and potential impact on Oakland (.2);	0.20	\$180.00
10/21/2024	Nathan Kuenzi	Continue analyzing coverage issues in Insurance Plan Term Sheet by reference to confirmed Plans in other cases (1.3);	1.30	\$715.00
10/21/2024	Timothy Burns	Participate in BB team conference re case developments, mediation issues, and related insurance assignments needed in connection with same (.4);	0.40	\$448.00
10/21/2024	Timothy Burns	Review A. Castro research memo re claims objection issues in preparation for insurance mediation (.2); review A. Castro memo re forum for 11580 actions in preparation for insurance mediation (.2);	0.40	\$448.00
10/21/2024	Timothy Burns	Correspondence with the mediators re ongoing mediation issues (.2);	0.20	\$224.00
10/21/2024	Nathan Kuenzi	Participate in BB team conference re case developments, mediation issues, and related insurance assignments needed in connection with same (.4);	0.40	\$220.00
10/21/2024	Timothy Burns	Review insurer's latest changes to the proposed insurance term sheet (.2);	0.20	\$224.00

10/21/2024	Nathan Kuenzi	Draft revised Insurance Plan Term Sheet (.9);	0.90	\$495.00
10/21/2024	Alexander Castro	Research re insurer claim objection issues in connection with ongoing insurance mediation negotiations (2.1);	2.10	\$987.00
10/21/2024	Timothy Burns	Participate in additional conference with J. Bair re continued negotiations of the insurers' term sheet (.2);	0.20	\$224.00
10/21/2024	Alexander Castro	Research Section 11580 forum issues re post-confirmation coverage litigation in connection with potential Plan (2.1); draft memo summarizing same (1.9);	4.00	\$1,880.00
10/22/2024	Nathan Kuenzi	Draft Insurer/RCBO mediation-related submission and send to T. Burns (.6);	0.60	\$330.00
10/22/2024	Nathan Kuenzi	Analyze revised redline of insurers' term sheet language (.3);	0.30	\$165.00
10/22/2024	Timothy Burns	Participate in mediation session for insurance purposes (4.6); participate in call with J. Bair re outcome of session and next-steps (.1);	4.70	\$5,264.00
10/22/2024	Timothy Burns	Participate in pre-mediation meeting with N. Kuenzi re mediation strategy (.2); participate in pre-mediation meeting with the mediator re ongoing negotiations (.2);	0.40	\$448.00
10/22/2024	Alexander Castro	Supplemental research in connection with insurer demand letter / bad faith presentation (.7); revise and edit presentation (1.4);	2.10	\$987.00
10/22/2024	Jesse Bair	Participate in conference with T. Burns re insurance mediation session outcome (.1);	0.10	\$90.00
10/22/2024	Nathan Kuenzi	Prepare for mediation session re case insurance issues (.3); participate in pre-mediation meeting with T. Burns re mediation strategy (.2); participate in mediation session for insurance purposes (4.6);	5.10	\$2,805.00
10/22/2024	Nathan Kuenzi	Review insurer reply brief in opposition to presentation of survivor statements (.4);	0.40	\$220.00
10/23/2024	Timothy Burns	Participate in conference with J. Bair re revised insurer exposure assessments (.3);	0.30	\$336.00
10/23/2024	Nathan Kuenzi	Research issues re bad faith and Hamilton agreements as applied in the bankruptcy context in connection with ongoing term sheet negotiations (2.0);	2.00	\$1,100.00
10/23/2024	Nathan Kuenzi	Revise/analyze Committee edits to insurance plan term sheet (.5);	0.50	\$275.00
10/23/2024	Timothy Burns	Review insurer's sur-reply re survivor statements and related papers (.3);	0.30	\$336.00
10/23/2024	Timothy Burns	Participate in call with state court counsel re mediation issues (.2); participate in call with the mediator re same (.2);	0.40	\$448.00

10/23/2024	Brian Cawley	Research Hamilton assignment issues in bankruptcy (1.1);	1.10	\$605.00
10/23/2024	Jesse Bair	Analyze claim information and develop revised insurer exposure assessments (.3); participate in conference with T. Burns re same (.3);	0.60	\$540.00
10/23/2024	Timothy Burns	Participate in call with the mediator and J. Bair re mediator information requests (.3);	0.30	\$336.00
10/23/2024	Timothy Burns	Participate in conference with J. Bair re mediators' insurance requests (.2);	0.20	\$224.00
10/23/2024	Jesse Bair	Participate in conference with T. Burns re mediators' insurance requests (.2);	0.20	\$180.00
10/23/2024	Jesse Bair	Participate in call with the mediator and T. Burns re mediator information requests (.3);	0.30	\$270.00
10/23/2024	Timothy Burns	Review and respond to N. Kuenzi correspondence re insurance term sheet (.1); participate in call with mediator re ongoing mediation negotiations (.1); correspond with the mediator re insurance analysis (.1);	0.30	\$336.00
10/24/2024	Jesse Bair	Brief review re Chubb's sur-reply in opposition to the Committee's survivor statement motion (.1);	0.10	\$90.00
10/24/2024	Nathan Kuenzi	Compare RCBO term sheet and Insurers' term sheet in light of proposed Committee term sheet (.4);	0.40	\$220.00
10/24/2024	Jesse Bair	Review B. Wiesenbergs correspondence re outcome of hearing re the Committee's survivor statement motion (.1);	0.10	\$90.00
10/24/2024	Timothy Burns	Analyze case law in connection with responding to mediator's insurance questions (.8);	0.80	\$896.00
10/24/2024	Nathan Kuenzi	Participate in conference with T. Burns re mediation-related submission (.1);	0.10	\$55.00
10/24/2024	Timothy Burns	Participate in conference with N. Kuenzi re mediation-related submission (.1);	0.10	\$112.00
10/24/2024	Nathan Kuenzi	Draft and revise mediation-related submission of Committee concerns with Insurers' term sheet and send to T. Burns (.3);	0.30	\$165.00
10/24/2024	Nathan Kuenzi	Research California bad faith issues in connection with ongoing term sheet negotiations (.3);	0.30	\$165.00
10/25/2024	Nathan Kuenzi	Draft and send revised memo to mediators re Committee concerns with insurer term sheet (.8);	0.80	\$440.00

10/25/2024	Timothy Burns	Participate in conference with the mediator re ongoing insurance negotiations and latest debtor offer (.6); participate in conference with state court counsel re same (.2); participate in conference with J. Bair re same (.2);	1.00	\$1,120.00
10/25/2024	Nathan Kuenzi	Review and edit T. Burns draft of memo re Committee issues with insurer term sheet (.4);	0.40	\$220.00
10/25/2024	Jesse Bair	Review email memo from the Committee to the mediators re the Committee's responses to the insurers' proposed term sheet (.2);	0.20	\$180.00
10/25/2024	Nathan Kuenzi	Participate in discussion with T. Burns regarding submission of Committee concerns regarding insurer term sheet to mediators (.1);	0.10	\$55.00
10/25/2024	Timothy Burns	Revise and edit memo to the mediators re Committee concerns with and edits to the insurers' proposed term sheet (1.3); conference with N. Kuenzi re same (.1);	1.40	\$1,568.00
10/25/2024	Jesse Bair	Participate in conference with T. Burns re the debtor's most recent mediation offer and potential Committee response to same (.2);	0.20	\$180.00
10/25/2024	Jesse Bair	Correspond with BB team re upcoming insurance status conference (.1);	0.10	\$90.00
10/26/2024	Timothy Burns	Participate in additional conference with the mediator re the debtor's counter offer (.3); participate in call with state court counsel re same (.2), participate in call with B. Weisenberg re same (.1);	0.60	\$672.00
10/26/2024	Jesse Bair	Review correspondence re mediation developments (.1);	0.10	\$90.00
10/28/2024	Timothy Burns	Review correspondence with state court counsel and Lowenstein re diocesan counter (.2); participate in call with B. Weisenberg re same (.2);	0.40	\$448.00
10/29/2024	Jesse Bair	Review M. Stippel memo re claim splitting and Cal. Ins. Code. Section 11580 (.1);	0.10	\$90.00
10/29/2024	Nathan Kuenzi	Analyze school claims data and correspond with T. Burns and J. Bair re same (.3);	0.30	\$165.00
10/29/2024	Nathan Kuenzi	Participate in call with the mediator re Committee issues with insurers' term sheet (.1);	0.10	\$55.00
10/29/2024	Timothy Burns	Review and respond to correspondence with Lowenstein and Stout re school cases (.2); review correspondence with state court counsel and Committee professionals re Diocese's counter (.1);	0.30	\$336.00

10/29/2024	Jesse Bair	Review correspondence with state court counsel and Committee professionals re the debtor's recent settlement offer (.1);	0.10	\$90.00
10/29/2024	Timothy Burns	Review and respond to email re prep for Survivor Statement Hearing (.1);	0.10	\$112.00
10/29/2024	Jesse Bair	Review various correspondence with the debtor and insurers re 10/31 insurance mediation session (.1);	0.10	\$90.00
10/29/2024	Jesse Bair	Review K. Sticklen memo re differences between the debtor's 4th amended complaint and the Committee's proposed 4th amended complaint (.1);	0.10	\$90.00
10/29/2024	Timothy Burns	Review Diocesan counter and related correspondence with Committee professionals and state court counsel (.2);	0.20	\$224.00
10/30/2024	Jesse Bair	Review additional correspondence with the debtor and insurers re upcoming 10.31 insurance mediation session (.1);	0.10	\$90.00
10/30/2024	Timothy Burns	Review and respond to correspondence with mediators re upcoming insurance mediation session (.2);	0.20	\$224.00
10/30/2024	Timothy Burns	Review valuation of school claims (.1);	0.10	\$112.00
10/30/2024	Nathan Kuenzi	Analyze Insurers' Oct. 29 draft of term sheet and prepare Committee response to same (2.8);	2.80	\$1,540.00
10/30/2024	Timothy Burns	Review N. Kuenzi analysis of insurer term sheet changes (.2); correspond with N. Kuenzi re additional assignment (.1);	0.30	\$336.00
10/30/2024	Jesse Bair	Review the insurers' clergy-III filings in the insurance adversary proceeding (.1); review and respond to correspondence with B. Wiesenberg re same (.1);	0.20	\$180.00
10/31/2024	Timothy Burns	Participate in call with B. Weisenberg re state court counsel meeting re mediation developments (.2);	0.20	\$224.00
10/31/2024	Timothy Burns	Participate in additional call with B. Weisenberg re mediation issues (.2);	0.20	\$224.00
10/31/2024	Jesse Bair	Review correspondence with the debtor and B. Wiesenberg re Clergy-III materials (.1);	0.10	\$90.00
10/31/2024	Nathan Kuenzi	Participate in insurance mediation session (3.0);	3.00	\$1,650.00
10/31/2024	Timothy Burns	Participate in insurance mediation session (3.0);	3.00	\$3,360.00
10/31/2024	Nathan Kuenzi	Additional analysis re latest draft of the insurers' proposed term sheet (.8);	0.80	\$440.00
10/31/2024	Jesse Bair	Participate in conference with T. Burns re outcome of insurance mediation session and next-steps re ongoing term sheet and settlement negotiations (.4);	0.40	\$360.00

10/31/2024	Timothy Burns	Prepare for insurance mediation session (.9);	0.90	\$1,008.00
10/31/2024	Timothy Burns	Participate in call with the mediator re insurance mediation issues (.2);	0.20	\$224.00
10/31/2024	Timothy Burns	Participate in conference with J. Bair re outcome of insurance mediation session and next-steps re ongoing term sheet and settlement negotiations (.4);	0.40	\$448.00
<b>Totals for Insurance Recovery Activities</b>			<b>165.30</b>	<b>\$117,716.00</b>

<b>Total Hours and Fees</b>			<b>181.80</b>	<b>\$131,256.00</b>
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### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/01/2024	Third Quarter 2024 PACER	\$100.70
10/02/2024	Certificate of Good Standing for Pro Hac Vice Application, N. Kuenzi	\$21.00
10/07/2024	Motion for Admission Pro Hac Vice, N. Kuenzi (Case No. 24-cv-00709)	\$328.00
10/07/2024	Motion for Admission Pro Hac Vice, N. Kuenzi (Case No. 23-40523)	\$328.00
10/13/2024	United Airlines Inflight Wi-Fi, T. Burns (MSN-DEN)	\$8.00
10/13/2024	Hotel, T. Burns (4 nights)	\$1,523.37
10/13/2024	United Inflight Wi-Fi, T. Burns (DEN-SFO)	\$8.00
10/14/2024	Train, N. Kuenzi	\$20.00
10/14/2024	United Airlines Inflight Wi-Fi, N. Kuenzi (DEN-SFO)	\$8.00
10/14/2024	Travel meal, T. Burns and N. Kuenzi	\$83.75
10/14/2024	Travel meal, T. Burns	\$29.33
10/14/2024	Travel meal, N. Kuenzi	\$5.21
10/14/2024	United Airlines, T. Burns (MSN-SFO, Oct. 14-18)	\$1,277.88
10/14/2024	United Airlines, N. Kuenzi (MSN-SFO, Oct. 14-18)	\$1,277.88
10/14/2024	United Airlines Inflight Wi-Fi, N. Kuenzi (MSN-DEN)	\$8.00
10/14/2024	Travel meal, N. Kuenzi	\$18.69
10/14/2024	Hotel, N. Kuenzi (3 nights)	\$1,156.72
10/15/2024	Uber, T. Burns and N. Kuenzi (hotel to mediation)	\$88.81
10/15/2024	Uber, T. Burns and N. Kuenzi	\$118.42
10/15/2024	Travel meal, T. Burns	\$19.55
10/16/2024	Travel meal, T. Burns	\$19.55
10/16/2024	Uber, T. Burns and N. Kuenzi	\$48.55
10/16/2024	Travel meal, N. Kuenzi	\$19.55

10/16/2024	Travel meal, N. Kuenzi	\$36.41
10/16/2024	Travel meal, T. Burns and N. Kuenzi	\$96.13
10/17/2024	Travel meal, T. Burns and N. Kuenzi	\$87.04
10/17/2024	Travel meal, T. Burns and N. Kuenzi	\$63.49
10/17/2024	Travel meal, T. Burns	\$9.78
10/17/2024	Travel meal, T. Burns	\$13.25
10/18/2024	Travel meal, N. Kuenzi	\$4.79
10/18/2024	Travel meal, T. Burns	\$9.78
10/18/2024	Travel meal, N. Kuenzi	\$6.04
10/18/2024	Travel meal, T. Burns	\$20.09
10/18/2024	Uber, T. Burns and N. Kuenzi (hotel to airport)	\$137.84
10/18/2024	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
10/18/2024	Travel meal, N. Kuenzi	\$4.50
10/21/2024	United Airlines, N. Kuenzi (MSN-SFO, Oct. 21-23)	\$737.14
10/21/2024	Travel meal, N. Kuenzi	\$22.02
10/21/2024	Hotel, N. Kuenzi (2 nights)	\$697.22
10/21/2024	Travel Meal, T. Burns	\$35.02
10/21/2024	Travel meal, N. Kuenzi	\$27.35
10/21/2024	MSN Airport Parking, T. Burns	\$5.00
10/22/2024	Travel meal, N. Kuenzi	\$18.67
10/23/2024	Travel meal, N. Kuenzi	\$16.36
10/23/2024	Taxi, N. Kuenzi (hotel to airport)	\$67.90
10/23/2024	Travel meal, N. Kuenzi	\$6.76
<b>Total Expenses</b>		<b>\$8,647.54</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	38.00	\$470.00	\$17,860.00
Brenda Horn-Edwards	Paralegal	3.80	\$340.00	\$1,292.00
Brian Cawley	Associate	1.10	\$550.00	\$605.00
Jesse Bair	Partner	15.90	\$900.00	\$14,310.00
Karen Dempsey	Paralegal	1.20	\$340.00	\$408.00
Karin Jonch-Clausen	Associate	2.30	\$550.00	\$1,265.00
Katie Sticklen	Associate	3.10	\$470.00	\$1,457.00
Morgan Stippel	Associate	5.30	\$550.00	\$2,915.00
Nathan Kuenzi	Associate	58.40	\$550.00	\$32,120.00
Timothy Burns	Partner	52.70	\$1,120.00	\$59,024.00

**Total Due This Invoice: \$139,903.54**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Roman Catholic Bishop of Oakland UCC**

**Issue Date :** 12/28/2024

**Bill # :** 01790

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/1/2024	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re mediation and litigation strategy (1.1);	1.10	\$990.00
11/8/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, Debtor Plan, and Committee response to same (1.1);	1.10	\$990.00
11/21/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case developments, strategy, and upcoming hearings (.6);	0.60	\$672.00
11/21/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments, upcoming hearings, and overall case strategy (.6);	0.60	\$540.00
11/22/2024	Timothy Burns	Prepare for Committee meeting (.1); participate in Committee meeting for insurance purposes re various case developments and next-steps (1.1);	1.20	\$1,344.00
11/22/2024	Jesse Bair	Prepare for Committee meeting (.1); participate in Committee meeting for insurance purposes re various case developments and next-steps (1.1);	1.20	\$1,080.00
<b>Totals for Committee Meetings</b>			<b>5.80</b>	<b>\$5,616.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/26/2024	Jesse Bair	Correspond with K. Dempski and G. Albert re monthly fee statements (.1);	0.10	\$90.00

11/26/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
11/27/2024	Jesse Bair	Review and edit monthly fee statement (.1); correspond with G. Albert re same (.1);	0.20	\$180.00
11/27/2024	Jesse Bair	Brief review re the fee examiner's comments to Burns Bair's third interim fee statement (.2);	0.20	\$180.00
11/28/2024	Jesse Bair	Review case materials and draft responses to each of the fee examiner's comments on Burns Bair's third interim fee statement (.7);	0.70	\$630.00
<b>Totals for Fee Applications</b>			<b>1.50</b>	<b>\$1,182.00</b>

### Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/26/2024	Timothy Burns	Participate in case management conference in the insurance adversary proceeding (.5); participate in post-hearing call with J. Bair re outcome of same and next-steps (.1);	0.60	\$672.00
11/26/2024	Jesse Bair	Attend insurance case management conference (.5); participate in call with T. Burns re outcome of same and next-steps (.1);	0.60	\$540.00
11/27/2024	Jesse Bair	Attend hearing for insurance purposes re the debtor's motion to enlarge time to respond to the Committee's motion to lift stay and motion for derivative standing (1.0);	1.00	\$900.00
<b>Totals for Hearings</b>			<b>2.20</b>	<b>\$2,112.00</b>

### Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/1/2024	Timothy Burns	Participate in call with with state court counsel re Committee insurance strategy (.4);	0.40	\$448.00
11/1/2024	Jesse Bair	Participate in call with the mediator and T. Burns re ongoing mediation negotiations and cancellation of next session (.4); review and respond to related correspondence with the mediator and debtor re same (.1);	0.50	\$450.00
11/1/2024	Jesse Bair	Review and respond to correspondence with the debtor and insurers re extension of the case management conference (.1);	0.10	\$90.00
11/1/2024	Jesse Bair	Participate in conference with Lowenstein and T. Burns re mediation status, strategy, and next-steps (.7);	0.70	\$630.00

11/1/2024	Jesse Bair	Participate in call with state court counsel and T. Burns re mediation status and strategy (.1);	0.10	\$90.00
11/1/2024	Timothy Burns	Participate in call with Committee professionals re mediation strategy and next-steps (.7);	0.70	\$784.00
11/1/2024	Timothy Burns	Participate in additional call with state court counsel re mediation and litigation strategy (.1);	0.10	\$112.00
11/1/2024	Timothy Burns	Participate in call with the mediator and J. Bair re ongoing mediation negotiations (.4); participate in call with state court counsel and J. Bair re same (.1);	0.50	\$560.00
11/1/2024	Nathan Kuenzi	Draft email to T. Burns summarizing issues with future claimants in draft term sheet (.3);	0.30	\$165.00
11/1/2024	Nathan Kuenzi	Draft revised insurance term sheet addressing Committee concerns and incorporating debtor and Insurer revisions (2.9); correspond with T. Burns re same (.1);	3.00	\$1,650.00
11/1/2024	Karen Dempksi	Docket/calendar survivor statement hearings (.1);	0.10	\$34.00
11/3/2024	Timothy Burns	Review correspondence with B. Wiesenbergs and the Committee re mediation developments and cancellation of next session (.1); review correspondence describing components of diocesan counter (.1);	0.20	\$224.00
11/4/2024	Alexander Castro	Draft Boicourt letter template re request for disclosure of applicable policy limits and other information (1.4);	1.40	\$658.00
11/4/2024	Timothy Burns	Review and respond to correspondence with the Debtor and insurers re extension of case management conference in the insurance adversary proceeding (.2); correspond with Committee professionals re same (.1);	0.30	\$336.00
11/4/2024	Jesse Bair	Review B. Wiesenbergs email memo re analysis of debtor offer and state court counsel response re same (.1);	0.10	\$90.00
11/4/2024	Jesse Bair	Review draft stipulation to adjourn insurance case management conference (.1); review related correspondence with the insurers and debtor re same (.1);	0.20	\$180.00
11/5/2024	Jesse Bair	Review and respond to correspondence with the debtor and B. Wiesenbergs re Clergy-III materials needed for production (.1);	0.10	\$90.00
11/5/2024	Alexander Castro	Revise Committee demand letter PowerPoint (.3);	0.30	\$141.00
11/5/2024	Jesse Bair	Review revised memo re Chubb unfair claims handling practices (.1);	0.10	\$90.00

11/5/2024	Timothy Burns	Draft internal memo re conceptual problems with the insurers' mediation submission/term sheet (.2);	0.20	\$224.00
11/5/2024	Alexander Castro	Participate in conference with T. Burns re revisions needed to Committee demand letter presentation (.2);	0.20	\$94.00
11/5/2024	Timothy Burns	Provide instructions to A. Castro re revisions needed to Committee demand letter presentation (.2);	0.20	\$224.00
11/5/2024	Alexander Castro	Continue drafting Boicourt letter template (1.0);	1.00	\$470.00
11/5/2024	Nathan Kuenzi	Correspond with T. Burns re upcoming insurance status conference (.2);	0.20	\$110.00
11/5/2024	Timothy Burns	Review and revise demand letter presentation for state court counsel (.7);	0.70	\$784.00
11/5/2024	Alexander Castro	Case law research re particular requirements of Boicourt letters (.9);	0.90	\$423.00
11/5/2024	Jesse Bair	Review order adjourning insurance case management conference and related filings (.1);	0.10	\$90.00
11/5/2024	Alexander Castro	Supplemental research re California law re particular requirements for reasonable insurance demands in sexual abuse context (.8);	0.80	\$376.00
11/5/2024	Jesse Bair	Participate in call with state court counsel re outcome of survivor statement hearing (.1);	0.10	\$90.00
11/5/2024	Nathan Kuenzi	Analyze issues regarding Diocese/Insurers term sheet and draft revisions to Committee working redline (.8);	0.80	\$440.00
11/6/2024	Jesse Bair	Participate in conference with T. Burns re ongoing mediation discussions and next-steps re case litigation (.3);	0.30	\$270.00
11/6/2024	Timothy Burns	Participate in conference with J. Bair re ongoing mediation discussions and next-steps re case litigation (.3);	0.30	\$336.00
11/6/2024	Timothy Burns	Participate in call with Lowenstein re response to the debtor's anticipated disclosure statement and Plan filings (.4);	0.40	\$448.00
11/7/2024	Timothy Burns	Participate in call with state court counsel re mediation and strategy re the debtor's Plan filing (1.2);	1.20	\$1,344.00
11/7/2024	Alexander Castro	Review and edit revised version of Boicourt letter template (.4);	0.40	\$188.00
11/7/2024	Timothy Burns	Review and revise Boicourt letter template (.8);	0.80	\$896.00
11/7/2024	Alexander Castro	Draft revised version of demand letter PowerPoint for state court counsel to incorporate suggestions from T. Burns (2.9);	2.90	\$1,363.00

11/7/2024	Nathan Kuenzi	Participate in portion of call with state court counsel and T. Burns re mediation and strategy re the debtor's Plan filing (1.0);	1.00	\$550.00
11/8/2024	Jesse Bair	Participate in conference with Lowenstein and Stout re case developments, Debtor Plan, and next-steps in light of same (.2);	0.20	\$180.00
11/8/2024	Nathan Kuenzi	Begin reviewing and analyzing the Debtors' Plan, Disclosure Statement, and related exhibits (.8);	0.80	\$440.00
11/8/2024	Timothy Burns	Participate in conference with J. Bair re the debtor's plan and response to same (.1); participate in call with B. Weisenberg and J. Bair re same (.2);	0.30	\$336.00
11/8/2024	Timothy Burns	Participate in conference with J. Bair re outcome of Committee meeting and case next-steps (.2);	0.20	\$224.00
11/8/2024	Timothy Burns	Review correspondence with the Committee re survivor statement hearing (.1); review B. Weisenberg correspondence re insurance adversary proceeding (.1);	0.20	\$224.00
11/8/2024	Jesse Bair	Participate in conference with T. Burns re outcome of Committee meeting and next-steps (.2);	0.20	\$180.00
11/8/2024	Jesse Bair	Participate in conference with B. Wiesenberg and T. Burns re forthcoming Debtor Plan and next-steps (.2); participate in additional conference with T. Burns re same (.1);	0.30	\$270.00
11/9/2024	Timothy Burns	Brief review of revised demand letter presentation for state court counsel (.1);	0.10	\$112.00
11/9/2024	Jesse Bair	Review B. Wiesenberg email memo re Debtor Plan terms (.2); review and respond to correspondence with T. Burns re same and potential Committee response (.1);	0.30	\$270.00
11/9/2024	Timothy Burns	Review correspondence with Lowenstein and the Committee re Survivor Statement Hearing (.1); review related attachments (.1);	0.20	\$224.00
11/11/2024	Nathan Kuenzi	Continue reviewing and analyzing the Debtors' Plan, Disclosure Statement, and related exhibits (.9);	0.90	\$495.00
11/11/2024	Jesse Bair	Review B. Wiesenberg email memo re high-level overview of debtor plan (.1);	0.10	\$90.00
11/11/2024	Timothy Burns	Participate in call with state court counsel re the debtor's plan and disclosure statements filings (.5); participate in additional call with state court counsel re same and potential Committee responses (.3);	0.80	\$896.00

11/11/2024	Jesse Bair	Participate in conference with Lowenstein and Stout re the debtor's plan and strategy re potential Committee responses to same (.3);	0.30	\$270.00
11/11/2024	Jesse Bair	Analyze disclosure statement rulings from other diocesan cases and draft correspondence to Lowenstein re same and potential relevance to Committee objections to the Diocese's disclosure statement in Oakland (.5);	0.50	\$450.00
11/11/2024	Timothy Burns	Review RCBO's Disclosure Statement (3.8);	3.80	\$4,256.00
11/11/2024	Jesse Bair	Review and analyze the debtor's disclosure statement for insurance purposes (2.0);	2.00	\$1,800.00
11/12/2024	Jesse Bair	Review correspondence with B. Wiesenbergs and the Committee re debtor Plan issues (.1);	0.10	\$90.00
11/12/2024	Timothy Burns	Participate in conference with J. Bair re Committee response to the debtor's disclosure statement and Plan (.2);	0.20	\$224.00
11/12/2024	Nathan Kuenzi	Continue reviewing and analyzing the Debtors' Plan, Disclosure Statement, and related exhibits (2.6); outline summary of same in connection with forthcoming Committee opposition (1.9);	4.50	\$2,475.00
11/12/2024	Jesse Bair	Participate in conference with T. Burns re the debtor's disclosure statement and potential Committee objections to same (.2);	0.20	\$180.00
11/12/2024	Timothy Burns	Review research re self-insured retention issues (.1);	0.10	\$112.00
11/12/2024	Nathan Kuenzi	Draft summary of key insurance points in debtor's Plan for review of T. Burns and J. Bair (.6);	0.60	\$330.00
11/13/2024	Nathan Kuenzi	Supplemental analysis of the debtor's Plan and disclosure statement in connection with particular case insurance issues (.8);	0.80	\$440.00
11/13/2024	Timothy Burns	Participate in call with B. Weisenberg and J. Bair re Committee strategy and upcoming projects in response to the debtor's Plan and disclosure statement (.2);	0.20	\$224.00
11/13/2024	Karen Dempsey	Docket/calendar motion hearing to approve disclosure statement (.1);	0.10	\$34.00
11/13/2024	Jesse Bair	Participate in call with B. Wiesenbergs and T. Burns re Committee strategy and next-steps in response to the debtor's Plan and disclosure statement (.2);	0.20	\$180.00

11/14/2024	Timothy Burns	Review correspondence with B. Weisenberg and the Committee re upcoming Committee meeting and ongoing projects in response to the Debtor's Plan (.1);	0.10	\$112.00
11/15/2024	Alexander Castro	Review correspondence from T. Burns re research project re insurance derivative standing issues (.1);	0.10	\$47.00
11/15/2024	Jesse Bair	Brief review re draft lift stay test case motion and research re test case issues from other diocesan cases for use in Oakland case (.1);	0.10	\$90.00
11/15/2024	Alexander Castro	Draft research table summarizing creditors' committee derivative standing caselaw in the insurance context (1.7);	1.70	\$799.00
11/15/2024	Jesse Bair	Review correspondence with BB team and brief research re insurance derivative standing issue (.1);	0.10	\$90.00
11/15/2024	Alexander Castro	Research case law nationwide re creditors' committee derivative standing in insurance coverage actions (1.8);	1.80	\$846.00
11/15/2024	Alexander Castro	Research 9th Circuit caselaw re creditors' committee derivative standing in insurance coverage actions (3.9);	3.90	\$1,833.00
11/15/2024	Timothy Burns	Provide instructions to A. Castro re insurance derivative standing research assignment (.2);	0.20	\$224.00
11/16/2024	Jesse Bair	Brief review of initial draft of the Committee's lift stay motion (.2); review and respond to correspondence with Committee professionals re insurance edits needed to same (.2);	0.40	\$360.00
11/16/2024	Timothy Burns	Review and revise motion for relief from stay brief for insurance purposes (3.3);	3.30	\$3,696.00
11/16/2024	Nathan Kuenzi	Revise and edit motion to lift stay brief to incorporate particular insurance suggestions from T. Burns (1.1);	1.10	\$605.00
11/17/2024	Timothy Burns	Review A. Castro research summary re derivative standing issues re insurance action and related case law (.8);	0.80	\$896.00
11/17/2024	Timothy Burns	Review latest iteration of the Committee's motion for relief from stay (.3); participate in call with B. Weisenberg re same (.2);	0.50	\$560.00
11/17/2024	Timothy Burns	Further revisions to the Committee's motion for relief from stay (1.1); review and respond to correspondence with Committee professionals re same (.3);	1.40	\$1,568.00

11/17/2024	Jesse Bair	Review and edit revised version of the Committee's lift stay brief (1.5); review and respond to correspondence with Committee professionals re insurance edits in connection with same (.2);	1.70	\$1,530.00
11/18/2024	Jesse Bair	Review and edit further revised version of the Committee's lift stay motion for insurance purposes (.4); review and respond to various correspondence with Committee professionals re same and additional potential revisions (.3);	0.70	\$630.00
11/18/2024	Timothy Burns	Further revisions to latest version of the Committee's motion for relief from stay (1.0); participate in call with state court counsel re same (.2); participate in call with B. Weisenberg re same (.2);	1.40	\$1,568.00
11/18/2024	Timothy Burns	Review and respond to various correspondence with B. Weisenberg re motion for relief from stay issues (.4);	0.40	\$448.00
11/19/2024	Jesse Bair	Prepare for call with Committee professionals re Committee insurance lift stay strategy (.2); participate in call with B. Wiesenberg and T. Burns re insurance strategy and edits re the Committee's lift stay brief (.5);	0.70	\$630.00
11/19/2024	Timothy Burns	Participate in additional call with B. Weisenberg re motion for relief from stay insurance briefing issues (.2);	0.20	\$224.00
11/19/2024	Timothy Burns	Participate in call with state court counsel re stay relief briefing strategy (.5);	0.50	\$560.00
11/19/2024	Jesse Bair	Review and edit email memo to state court counsel re insurance strategy re the Committee's lift stay motion (.3); participate in call with B. Wiesenberg re same (.1); review follow-up correspondence with state court counsel and Committee professionals re same (.2);	0.60	\$540.00
11/19/2024	Timothy Burns	Review and revise latest version of the Committee's motion for relief from stay (.3); review correspondence with Committee professionals and state court counsel re same (.2);	0.50	\$560.00
11/19/2024	Timothy Burns	Review correspondence with the debtor and insurers re unredacted proofs of claim production (.1);	0.10	\$112.00
11/19/2024	Jesse Bair	Review the debtor's proposed order staying the insurance case and related correspondence from the debtor (.1);	0.10	\$90.00

11/19/2024 Timothy Burns	Correspond with J. Bair and N. Kuenzi re the debtor's Motion to Hold Case in Abeyance filed in insurance adversary proceeding (.1); review motion (.2); review correspondence with B. Weisenberg re same (.1); correspond with BB team re preparation of response to motion (.1);	0.50	\$560.00
11/19/2024 Timothy Burns	Review correspondence with state court counsel responding to memo re Committee strategy re motion for relief from stay (.2);	0.20	\$224.00
11/19/2024 Timothy Burns	Review and edit email memo to state court counsel re Committee insurance strategy re motion for relief from stay (.5);	0.50	\$560.00
11/19/2024 Timothy Burns	Participate in call with J. Bair and Lowenstein re Committee insurance strategy re motion for relief from stay and related briefing edits (.5);	0.50	\$560.00
11/20/2024 Jesse Bair	Review and respond to correspondence with Committee professionals re strategy re the Committee's derivative standing motion to pursue the insurance action (.2);	0.20	\$180.00
11/20/2024 Jesse Bair	Review A. Castro research summary re case law re derivative standing to pursue debtor insurance claims (.2); review N. Kuenzi email memo re "abandonment" derivative standing research (.1); consideration of Committee insurance derivative strategy in light of research results (.1);	0.40	\$360.00
11/20/2024 Nathan Kuenzi	Draft email memo to T. Burns and J. Bair summarizing research re "abandonment" of cause of action in connection with RCBO's recent motion to hold the insurance action in abeyance (.8);	0.80	\$440.00
11/20/2024 Jesse Bair	Provide instructions to N. Kuenzi re preparing initial draft of the Committee's insurance derivative standing motion (.1);	0.10	\$90.00
11/20/2024 Jesse Bair	Review the debtor's motion to stay the insurance action (.2); correspond with the debtor re same (.1);	0.30	\$270.00
11/20/2024 Karen Dempski	Docket/calendar abeyance motion hearing (.1);	0.10	\$34.00
11/20/2024 Jesse Bair	Review B. Wiesenberg correspondence with state court counsel re recent motions, the debtor's disclosure statement, and insurance strategy meeting (.1);	0.10	\$90.00
11/20/2024 Jesse Bair	Correspond with Committee professionals re timing of insurance derivative standing motion and call to discuss strategy re same (.1);	0.10	\$90.00

11/20/2024	Nathan Kuenzi	Research case law re "abandonment" of cause of action in connection with insurance derivative standing issues and the debtor's recent motion to hold the insurance action in abeyance (2.0);	2.00	\$1,100.00
11/21/2024	Timothy Burns	Review church property and parochial fund adversary proceeding complaint (.2); review the Committee's motion for derivative standing re same (.2);	0.40	\$448.00
11/21/2024	Nathan Kuenzi	Draft outline of the Committee's insurance motion for derivative standing (2.3);	2.30	\$1,265.00
11/21/2024	Nathan Kuenzi	Participate in conference with J. Bair and T. Burns re strategy in connection with the Committee's insurance derivative standing motion (.3);	0.30	\$165.00
11/21/2024	Timothy Burns	Participate in conference with Committee professionals re strategy and drafting re the Committee's insurance derivative standing motion (.6);	0.60	\$672.00
11/21/2024	Timothy Burns	Participate in conference with J. Bair and N. Kuenzi re the Committee's insurance derivative standing motion (.3); participate in additional conference with J. Bair re assignments and strategy in connection with same (.2);	0.50	\$560.00
11/21/2024	Jesse Bair	Participate in additional conference with T. Burns re strategy re insurance derivative standing motion (.2);	0.20	\$180.00
11/21/2024	Timothy Burns	Review BB internal correspondence re case management conference in the insurance adversary proceeding (.1);	0.10	\$112.00
11/21/2024	Katie Sticklen	Draft the Committee's derivative insurance complaint (4.9);	4.90	\$2,303.00
11/21/2024	Jesse Bair	Participate in conference with Committee professionals re strategy and drafting re the Committee's insurance derivative standing motion (.6); participate in follow-up meeting with T. Burns and N. Kuenzi re same (.3);	0.90	\$810.00
11/21/2024	Timothy Burns	Review joinder in abeyance motion in insurance adversary (.1);	0.10	\$112.00
11/21/2024	Nathan Kuenzi	Review the Committee's motion for derivative standing to pursue parochial fund claim (.2); review related complaint re same (.2);	0.40	\$220.00
11/21/2024	Karen Dempksi	Docket/calendar hearings re motions to lift stay and standing to prosecute parochial fund claim (.1);	0.10	\$34.00

11/21/2024	Nathan Kuenzi	Participate in conference with Committee professionals re the Committee's insurance derivative standing motion, the Debtor's motion to hold the insurance case in abeyance, and strategy in connection with same (.6);	0.60	\$330.00
11/22/2024	Nathan Kuenzi	Analyze Plan language with respect to insurance assignment and control of post-confirmation coverage litigation (.4); draft email memo to J. Bair and T. Burns re same (.3);	0.70	\$385.00
11/22/2024	Jesse Bair	Participate in call with B. Wiesenbergs re lift stay strategy (.1);	0.10	\$90.00
11/22/2024	Nathan Kuenzi	Participate in conference with BB team re preparing the Committee's insurance derivative standing motion (.2);	0.20	\$110.00
11/22/2024	Jesse Bair	Respond to BB correspondence re upcoming insurance case management conference (.1);	0.10	\$90.00
11/22/2024	Timothy Burns	Review and revise outline of the Committee's insurance motion for derivative standing (.2);	0.20	\$224.00
11/22/2024	Jesse Bair	Brief review re Debtor Plan in connection with draft insurance derivative standing motion (.2);	0.20	\$180.00
11/22/2024	Timothy Burns	Review and begin revising draft case management conference statement in the insurance adversary proceeding (.6);	0.60	\$672.00
11/22/2024	Jesse Bair	Participate in conference with BB team re preparing the Committee's insurance derivative standing motion (.2); answer follow-up questions re same (.2);	0.40	\$360.00
11/22/2024	Nathan Kuenzi	Begin drafting the Committee's insurance derivative standing motion (4.9);	4.90	\$2,695.00
11/23/2024	Jesse Bair	Review and edit the Committee's insert to the joint insurance case management statement (.4); review and respond to correspondence with Committee professionals re same (.1);	0.50	\$450.00
11/23/2024	Nathan Kuenzi	Continue drafting the Committee's insurance derivative standing motion (1.3);	1.30	\$715.00
11/23/2024	Timothy Burns	Finish reviewing and revising case management conference statement in the insurance adversary proceeding to include Intervenor's positions (1.4);	1.40	\$1,568.00
11/24/2024	Timothy Burns	Prepare for case management conference hearing in the insurance adversary proceeding (.4);	0.40	\$448.00
11/24/2024	Nathan Kuenzi	Continue drafting the Committee's insurance derivative standing motion (4.4);	4.40	\$2,420.00

11/25/2024	Jesse Bair	Review correspondence with Committee professionals re upcoming insurance case management conference (.1);	0.10	\$90.00
11/25/2024	Nathan Kuenzi	Participate in conference with T. Burns re additional draft revisions to the insurance case management statement (.2);	0.20	\$110.00
11/25/2024	Jesse Bair	Review and edit the Committee's opposition to the debtor's motion to enlarge time to respond to the Committee's motion to lift stay and derivative standing motion (.2);	0.20	\$180.00
11/25/2024	Nathan Kuenzi	Analyze the debtor's proposed changes to the insurance case management statement (.2);	0.20	\$110.00
11/25/2024	Timothy Burns	Brief review of the Debtor's plan (.2) and disclosure statement (.2) in preparation for hearing in the insurance adversary proceeding;	0.40	\$448.00
11/25/2024	Timothy Burns	Review the Committee's Objection to the debtor's motion for Enlargement of Time to respond (.2);	0.20	\$224.00
11/25/2024	Timothy Burns	Brief review of current draft of the Committee's insurance derivative standing motion (.3); correspond with N. Kuenzi re follow up re same (.1);	0.40	\$448.00
11/25/2024	Nathan Kuenzi	Participate in call with T. Burns and the debtor re proposed revisions to the insurance case management conference statement (.1);	0.10	\$55.00
11/25/2024	Nathan Kuenzi	Finish drafting initial version of the Committee's insurance derivative standing motion (5.7);	5.70	\$3,135.00
11/25/2024	Timothy Burns	Review and revise updated version of the joint case management conference statement in the insurance adversary proceeding (.3); participate in call with the debtor re same (.1); participate in conference with N. Kuenzi re changes to same (.2);	0.60	\$672.00
11/25/2024	Jesse Bair	Review and edit insurance case management statement (.2); review correspondence with the debtor and Committee professionals re additional edits to same (.1); review final version of insurance case management statement (.1);	0.40	\$360.00
11/26/2024	Nathan Kuenzi	Draft revised version of the Committee' insurance derivative standing motion to incorporate suggested revisions from T. Burns (1.1);	1.10	\$605.00
11/26/2024	Jesse Bair	Review A. Castro memo re Section 11580 forum issues (.1);	0.10	\$90.00

11/26/2024	Jesse Bair	Review K. Sticklen memo re Trustee issues in connection with post-confirmation insurance litigation (.1);	0.10	\$90.00
11/26/2024	Timothy Burns	Review and revise current draft of the Committee's insurance derivative standing motion (2.2);	2.20	\$2,464.00
11/26/2024	Jesse Bair	Review order setting status conference and related correspondence with Committee professionals re same (.1);	0.10	\$90.00
11/26/2024	Nathan Kuenzi	Analyze Debtor Plan re details of discharge (.1); correspond with T. Burns re same (.1);	0.20	\$110.00
11/26/2024	Jesse Bair	Review Committee PowerPoint re insurance demand letters (.1);	0.10	\$90.00
11/26/2024	Jesse Bair	Review M. Stippel memo re assignment of policy proceeds without policy obligations (.1);	0.10	\$90.00
11/26/2024	Jesse Bair	Brief review of and correspond with N. Kuenzi regarding current draft of the Committee's insurance derivative standing motion (.1);	0.10	\$90.00
11/26/2024	Timothy Burns	Participate in conference with N. Kuenzi re insurance derivative standing motion (.2); participate in call with B. Weisenberg re same (.2);	0.40	\$448.00
11/26/2024	Jesse Bair	Prepare for insurance case management conference (.2);	0.20	\$180.00
11/26/2024	Timothy Burns	Prepare for case status hearing in the insurance adversary proceeding, including review of the Debtor's plan, disclosure statement, Joint Case Management Report, and Motion to Hold Insurance Case in Abeyance (1.8);	1.80	\$2,016.00
11/26/2024	Nathan Kuenzi	Participate in call with B. Weisenberg re the insurance derivative standing motion (.1);	0.10	\$55.00
11/26/2024	Timothy Burns	Participate in conference with N. Kuenzi re preparations for case management conference in the insurance adversary proceeding (.2); participate in call with B. Weisenberg re same (.1);	0.30	\$336.00
11/26/2024	Nathan Kuenzi	Review B. Weisenberg's proposed revisions to the insurance derivative standing motion (1.1); draft revised version of motion to incorporate same (.8);	1.90	\$1,045.00
11/27/2024	Jesse Bair	Review the debtor's draft stipulation re insurance briefing schedule and correspond with B. Wiesenberg re same (.1);	0.10	\$90.00
11/27/2024	Nathan Kuenzi	Review stipulation to extend various insurance response deadline (.2); correspond with BB team re same and calendaring dates (.1);	0.30	\$165.00

11/27/2024 Timothy Burns	Prepare for hearing (.1); attend hearing for insurance purposes re the debtor's motions to extend time to respond to the Committee's motion to lift stay and certain derivative standing motions (1.0);	1.10	\$1,232.00
11/27/2024 Karen Dempksi	Docket/calendar status conference hearing (.1);	0.10	\$34.00
11/27/2024 Jesse Bair	Participate in call with state court counsel re outcome of motion to enlarge hearing and case next-steps (.1);	0.10	\$90.00
11/28/2024 Jesse Bair	Review and respond to correspondence with Committee professionals re insurance derivative standing motion edits and next-step (.1);	0.10	\$90.00
11/28/2024 Jesse Bair	Correspond with the debtor re stipulation re proposed insurance briefing schedule (.1);	0.10	\$90.00
11/29/2024 Jesse Bair	Review and respond to correspondence with Committee professionals re insurance derivative standing motion hearing date and preparations (.1);	0.10	\$90.00
11/30/2024 Jesse Bair	Review and respond to additional correspondence with Committee professionals re insurance derivative standing motion (.1);	0.10	\$90.00
11/30/2024 Karen Dempksi	Docket/calendar continued status/motion hearing (.1);	0.10	\$34.00
11/30/2024 Nathan Kuenzi	Review additional proposed revisions from B. Weisenberg to the Committee's insurance derivative standing motion (.6); review correspondence with Committee professionals re same (.2);	0.80	\$440.00
<b>Totals for Insurance Recovery Activities</b>		<b>115.20</b>	<b>\$87,418.00</b>
<b>Total Hours and Fees</b>		<b>124.70</b>	<b>\$96,328.00</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	15.40	\$470.00	\$7,238.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Jesse Bair	Partner	23.70	\$900.00	\$21,330.00
Karen Dempksi	Paralegal	0.60	\$340.00	\$204.00
Katie Sticklen	Associate	4.90	\$470.00	\$2,303.00
Nathan Kuenzi	Associate	42.50	\$550.00	\$23,375.00
Timothy Burns	Partner	37.30	\$1,120.00	\$41,776.00

**Total Due This Invoice: \$96,328.00**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Roman Catholic Bishop of Oakland UCC**

**Issue Date :** 1/30/2025

**Bill # :** 01816

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/19/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re disclosure statement hearing outcome and case next-steps (.9);	0.90	\$810.00
12/20/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re disclosure statement hearing outcome, next-steps, and overall Committee strategy (.8);	0.80	\$720.00
12/23/2024	Timothy Burns	Participate in state court counsel meeting re preparation and strategy for upcoming lift stay hearing (.5);	0.50	\$560.00
12/23/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation negotiations and lift stay hearing strategy (.5);	0.50	\$450.00
<b>Totals for Committee Meetings</b>			<b>2.70</b>	<b>\$2,540.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/6/2024	Jesse Bair	Review fee examiner's consolidated report and related correspondence with the fee examiner (.1);	0.10	\$90.00
12/12/2024	Jesse Bair	Review draft order approving interim fee applications (.1);	0.10	\$90.00
12/12/2024	Jesse Bair	Review and respond to correspondence with Committee professionals re outcome of interim fee application hearing and questions received from state court counsel re case insurance issues (.1);	0.10	\$90.00

12/17/2024	Jesse Bair	Draft Burns Bair interim budget (.4); correspondence with Committee and state court counsel re same (.1);	0.50	\$450.00
12/27/2024	Jesse Bair	Correspond with B. Horn-Edwards re Burns Bair monthly fee statement (.1);	0.10	\$90.00
12/28/2024	Jesse Bair	Review and edit monthly fee statement (.1); correspond with G. Albert re same (.1);	0.20	\$180.00
12/28/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
<b>Totals for Fee Applications</b>			<b>1.40</b>	<b>\$1,092.00</b>

### Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/11/2024	Nathan Kuenzi	Attend relevant portion of RCBO fee hearing via Zoom (.6);	0.60	\$330.00
12/13/2024	Nathan Kuenzi	Participate in survivor statement hearing for insurance purposes before Judge Lafferty (2.5);	2.50	\$1,375.00
12/18/2024	Jesse Bair	Participate in full-day hearing re the debtor's disclosure statement (6.3);	6.30	\$5,670.00
12/18/2024	Timothy Burns	Participate in full-day hearing re the debtor's disclosure statement (6.3);	6.30	\$7,056.00
<b>Totals for Hearings</b>			<b>15.70</b>	<b>\$14,431.00</b>

### Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/1/2024	Jesse Bair	Review revised version of insurance extension stipulation and order and correspond with debtor and the insurers re same (.1);	0.10	\$90.00
12/2/2024	Timothy Burns	Provide instructions to N. Kuenzi and A. Castro re research assignment for derivative standing motion (.2);	0.20	\$224.00
12/2/2024	Nathan Kuenzi	Draft email memo re demand letter presentation (.6);	0.60	\$330.00
12/2/2024	Nathan Kuenzi	Participate in conference with T. Burns re insurance demand presentation (.3);	0.30	\$165.00
12/2/2024	Timothy Burns	Review correspondence with G. Albert re Survivor Statement hearing (.1);	0.10	\$112.00
12/2/2024	Timothy Burns	Conference with N. Kuenzi re insurance demand presentation (.3);	0.30	\$336.00
12/3/2024	Nathan Kuenzi	Participate in conference with T. Burns re revisions to demand letter PowerPoint presentation (.3);	0.30	\$165.00
12/3/2024	Timothy Burns	Review B. Weisenberg correspondence re insurance briefing in the main case and insurance adversary (.1);	0.10	\$112.00

12/3/2024	Jesse Bair	Review orders granting extension of time in the insurance action (.1);	0.10	\$90.00
12/3/2024	Timothy Burns	Review order re response time re 5th amended complaint in insurance adversary (.1);	0.10	\$112.00
12/3/2024	Brian Cawley	Discuss insurance overview presentation and relevant material therein with T. Burns (.2);	0.20	\$110.00
12/3/2024	Nathan Kuenzi	Review additional suggested revisions from B. Wiesenberg re the Committee's insurance derivative standing motion (.5); brief review of case law cited therein (.2);	0.70	\$385.00
12/3/2024	Timothy Burns	Review correspondence with BB team re briefing in insurance adversary (.1);	0.10	\$112.00
12/3/2024	Timothy Burns	Participate in call with J. Bair re insurance demands (.1);	0.10	\$112.00
12/3/2024	Jesse Bair	Provide instructions to N. Kuenzi re drafting initial version of the Committee's insurance derivative standing motion (.2); participate in call with T. Burns re insurance demands (.1);	0.30	\$270.00
12/3/2024	Nathan Kuenzi	Participate in additional conference with T. Burns re insurance presentation (.1);	0.10	\$55.00
12/3/2024	Timothy Burns	Revise and edit correspondence to state court counsel re insurance presentations (.1); participate in call with B. Weisenberg re same (.1); conference with N. Kuenzi re follow-up assignment re same (.1);	0.30	\$336.00
12/3/2024	Alexander Castro	Correspond with N. Kuenzi re updated Oakland insurance presentation (.1);	0.10	\$47.00
12/3/2024	Nathan Kuenzi	Draft additional slides for Committee insurance presentation addressing Boicourt letters and demand letters (.8);	0.80	\$440.00
12/3/2024	Timothy Burns	Participate in additional conference with N. Kuenzi re insurance presentation (.1); correspond with state court counsel re same (.1);	0.20	\$224.00
12/4/2024	Nathan Kuenzi	Draft revised presentation re Boicourt letters and demand letters (1.4); analyze case law in connection with same (.6);	2.00	\$1,100.00
12/4/2024	Timothy Burns	Prepare for insurance demand Presentation (.6);	0.60	\$672.00
12/4/2024	Jesse Bair	Review and respond to correspondence with state court counsel re scope of California Insurance Code Section 999 (.1); participate in call with T. Burns re disclosure statement objection (.1);	0.20	\$180.00
12/4/2024	Nathan Kuenzi	Analyze issues pertaining to demand letters and Cal Code Civ Proc section 999 (.4);	0.40	\$220.00
12/4/2024	Nathan Kuenzi	Participate in presentation on demand letters (.6);	0.60	\$330.00

12/4/2024	Nathan Kuenzi	Prepare for presentation on demand letters (.2);	0.20	\$110.00
12/4/2024	Timothy Burns	Correspond with Lowenstein and BB re insurance demand presentation (.2); correspond with state court counsel re questions re presentation (.2); correspond with internal BB team re same (.1);	0.50	\$560.00
12/4/2024	Nathan Kuenzi	Research issues pertaining to unreasonable refusal to settle and bad faith law in California (.2); summarize research for T. Burns in email memo (.2);	0.40	\$220.00
12/4/2024	Timothy Burns	Present insurance demand Presentation (.6);	0.60	\$672.00
12/4/2024	Timothy Burns	Further revisions to insurance demand Presentation (.8);	0.80	\$896.00
12/4/2024	Alexander Castro	Research particular factual scenarios of unreasonable and reasonable refusals to settle caselaw for demand letter presentation (1.2);	1.20	\$564.00
12/4/2024	Timothy Burns	Participate in call with J. Bair re disclosure statement response (.1);	0.10	\$112.00
12/4/2024	Nathan Kuenzi	Correspond with state court counsel re demand letters and Boicourt letters (.2);	0.20	\$110.00
12/5/2024	Nathan Kuenzi	Draft revised Boicourt letter template (.3); correspond with T. Burns re same (.2);	0.50	\$275.00
12/5/2024	Timothy Burns	Review and revise Boicourt template letter (.3);	0.30	\$336.00
12/5/2024	Nathan Kuenzi	Further revise Boicourt letter template, including implementing T. Burns' suggested edits (.4); correspond with Lowenstein re same (.1);	0.50	\$275.00
12/5/2024	Nathan Kuenzi	Supplemental analysis of case law re Boicourt letter issues (.6);	0.60	\$330.00
12/6/2024	Nathan Kuenzi	Participate in discussion with J. Bair regarding upcoming survivor statement hearing (.2);	0.20	\$110.00
12/6/2024	Nathan Kuenzi	Participate in conference with J. Bair regarding Boicourt letters (.1);	0.10	\$55.00
12/6/2024	Jesse Bair	Review correspondence with Committee professionals re Boicourt letters and insurance demand presentation (.1);	0.10	\$90.00
12/6/2024	Jesse Bair	Provide instructions to N. Kuenzi re finalization of draft Boicourt letter template (.1); participate in conference with N. Kuenzi re upcoming survivor statement hearings (.2);	0.30	\$270.00
12/6/2024	Nathan Kuenzi	Participate in conference re demand letters and Boicourt letters with B. Weisenberg and state court counsel (.3);	0.30	\$165.00
12/6/2024	Nathan Kuenzi	Participate in additional conference with B. Weisenberg re Boicourt letters (.3);	0.30	\$165.00

12/6/2024	Timothy Burns	Prepare for (.5) and attend (.3) additional state court counsel meeting re insurance demands;	0.80	\$896.00
12/7/2024	Jesse Bair	Review the debtor's plan in connection with revising the Committee's opposition to the debtor's disclosure statement (.5);	0.50	\$450.00
12/7/2024	Timothy Burns	Review and analysis of Plan (2.8)	2.80	\$3,136.00
12/7/2024	Timothy Burns	Legal research re Plan insurance provisions (.8)	0.80	\$896.00
12/7/2024	Jesse Bair	Review and edit the Committee's opposition to the debtor's disclosure statement (2.0);	2.00	\$1,800.00
12/8/2024	Timothy Burns	Correspond with B. Weisenberg re analysis of Plan's offset provision for disclosure statement objection (.3);	0.30	\$336.00
12/8/2024	Nathan Kuenzi	Research issues pertaining to third party bad faith actions against insurance company where final adjudicated judgments have been obtained (1.5);	1.50	\$825.00
12/8/2024	Nathan Kuenzi	Draft email memorandum for T. Burns addressing RCBO Plan and impact on survivor recoveries against insurers, taking into account Hand v. Farmers Insurance Exchange and subsequent cases (1.3);	1.30	\$715.00
12/8/2024	Brian Cawley	Respond to T. Burns request regarding Section 11580 research (.1);	0.10	\$55.00
12/8/2024	Timothy Burns	Review and revise draft disclosure statement objection (1.2);	1.20	\$1,344.00
12/8/2024	Timothy Burns	Participate in call with J. Bair re disclosure statement objection (.5);	0.50	\$560.00
12/8/2024	Jesse Bair	Review correspondence with T. Burns and B. Wiesenberg re additional proposed revisions to the Committee's disclosure statement objection (.1); review revised version of the Committee's disclosure statement objection (.2); brief review of the debtor's Plan in connection with same (.1);	0.40	\$360.00
12/8/2024	Alexander Castro	Research jurisdictional issues surrounding Section 11580 actions in connection with potential disclosure statement objection (.5);	0.50	\$235.00
12/8/2024	Jesse Bair	Participate in call with T. Burns re insurance strategy in connection with the Committee's disclosure statement objection brief, related revisions to same, and hearing preparations (.5);	0.50	\$450.00
12/8/2024	Timothy Burns	Participate in call with B. Weisenberg re disclosure statement objection (.2);	0.20	\$224.00
12/8/2024	Timothy Burns	Review and analysis of remainder of Plan and Disclosure Statement (3.1);	3.10	\$3,472.00

12/9/2024	Timothy Burns	Participate in final presentation to state court counsel re demand letter issues (.7); follow-up call with individual state court counsel re same (.2);	0.90	\$1,008.00
12/9/2024	Jesse Bair	Participate in BB team conference re case developments and Committee insurance motions (.2);	0.20	\$180.00
12/9/2024	Nathan Kuenzi	Participate in presentation on Boicourt letters and demand letters with T. Burns to state court counsel (.7);	0.70	\$385.00
12/9/2024	Nathan Kuenzi	Participate in BB team conference re case developments and Committee insurance motions (.2);	0.20	\$110.00
12/9/2024	Timothy Burns	Participate in BB team conference re case developments and Committee insurance motions (.2);	0.20	\$224.00
12/9/2024	Nathan Kuenzi	Draft correspondence to state court counsel re debtor coverage program (.2);	0.20	\$110.00
12/9/2024	Alexander Castro	Research case law re whether section 11580 actions are direct actions under 28 U.S.C. 1332 (1.3); draft email memo summarizing research results (.3);	1.60	\$752.00
12/10/2024	Nathan Kuenzi	Correspond with state court counsel re insurance presentation and related issues (.1);	0.10	\$55.00
12/11/2024	Timothy Burns	Review notice of hearing re motion to appoint future claims representative (.1); review correspondence from B. Weisenberg re stay motion (.1); review correspondence with BB and state court counsel re coverage issues (.1);	0.30	\$336.00
12/11/2024	Timothy Burns	Review internal memos re insurance Plan issues (.3);	0.30	\$336.00
12/12/2024	Karen Dempksi	Docket/calendar objection hearing for 1/22/25 (.1);	0.10	\$34.00
12/12/2024	Jesse Bair	Correspond with B. Wiesenberg re the Committee's insurance derivative standing motion (.1);	0.10	\$90.00
12/12/2024	Timothy Burns	Participate in call with B. Weisenberg re insurance derivative standing motion and insurance questions received from state court counsel (.3);	0.30	\$336.00
12/13/2024	Timothy Burns	Review correspondence with B. Weisenberg and state court counsel re Unknown Abuse Claims Representative retention motion (.1);	0.10	\$112.00
12/13/2024	Timothy Burns	Review and revise draft derivative standing motion (1.2);	1.20	\$1,344.00

12/13/2024	Jesse Bair	Review and edit the Committee's insurance derivative standing motion (2.2); correspond with Committee professionals re same (.1);	2.30	\$2,070.00
12/13/2024	Jesse Bair	Participate in conference with T. Burns re the Committee's insurance derivative standing motion (.1);	0.10	\$90.00
12/13/2024	Nathan Kuenzi	Participate in conferences with survivors in preparation for survivors statement hearing (1.0);	1.00	\$550.00
12/13/2024	Timothy Burns	Conference with J. Bair re derivative standing motion (.1);	0.10	\$112.00
12/13/2024	Nathan Kuenzi	Participate in post-hearing conference with survivors, state court counsel, and Committee professionals re hearing outcome, case issues, and next-steps (2.0);	2.00	\$1,100.00
12/14/2024	Timothy Burns	Review additional edits to draft derivative standing motion (.2);	0.20	\$224.00
12/14/2024	Nathan Kuenzi	Review J. Bair and B. Weisenberg's suggested edits to the draft insurance derivative standing motion and implement same (.6);	0.60	\$330.00
12/14/2024	Jesse Bair	Review and edit further revised version of the Committee's insurance derivative standing motion (.1); review and respond to correspondence with B. Wiesenberg re same (.1);	0.20	\$180.00
12/15/2024	Nathan Kuenzi	Draft revised version of the Committee's insurance derivative standing motion to incorporate remainder of suggested edits received from partners (2.8);	2.80	\$1,540.00
12/15/2024	Jesse Bair	Brief review re additional suggested edits from B. Wiesenberg to the Committee's insurance derivative standing motion (.1); correspond with N. Kuenzi re same and additional revisions needed to the brief (.1);	0.20	\$180.00
12/16/2024	Timothy Burns	Conference with J. Bair re derivative standing motion (.1);	0.10	\$112.00
12/16/2024	Nathan Kuenzi	Participate in conference with G. Albert re finalization and filing of the Committee's insurance derivative standing motion (.1);	0.10	\$55.00
12/16/2024	Timothy Burns	Conference with N. Kuenzi re survivor statement hearing and derivative standing motion (.1);	0.10	\$112.00
12/16/2024	Nathan Kuenzi	Prepare final version of the Committee's insurance derivative standing motion (4.2);	4.20	\$2,310.00
12/16/2024	Nathan Kuenzi	Supplemental case law research in connection with finalizing the Committee's insurance derivative standing motion (1.9);	1.90	\$1,045.00

12/16/2024	Jesse Bair	Review and edit further revised version of the Committee's insurance derivative standing motion (.7); review and respond to various correspondence with Committee professionals re same and additional revisions (.3); participate in conference with T. Burns re same and abeyance opposition before Judge Corley (.1);	1.10	\$990.00
12/16/2024	Timothy Burns	Review October 24, 2024 hearing transcript in preparation for upcoming disclosure statement hearing (.4);	0.40	\$448.00
12/16/2024	Nathan Kuenzi	Prepare exhibits to the Committee's insurance derivative standing motion (.6);	0.60	\$330.00
12/16/2024	Nathan Kuenzi	Review and respond to various correspondence with Committee professionals re revisions and finalization of the Committee's insurance derivative standing motion (.4);	0.40	\$220.00
12/17/2024	Jesse Bair	Review the debtor's reply to the Committee's disclosure statement objection (.6);	0.60	\$540.00
12/17/2024	Karen Dempksi	Docket/calendar motion for standing hearing (.1);	0.10	\$34.00
12/17/2024	Timothy Burns	Review plan notes, plan, disclosure statement, and disclosure statement briefing to prepare for upcoming disclosure statement hearing (4.8);	4.80	\$5,376.00
12/17/2024	Jesse Bair	Detailed review of the debtor's Plan in preparation for upcoming disclosure statement hearing (1.8);	1.80	\$1,620.00
12/17/2024	Jesse Bair	Review the US Trustee's disclosure statement objection (.4); review the Debtor's reply to same (.3);	0.70	\$630.00
12/17/2024	Jesse Bair	Additional review of the Debtor's Disclosure Statement in preparation for upcoming Disclosure Statement Hearing (1.2); draft outline for hearing argument re insurance issues (1.0);	2.20	\$1,980.00
12/17/2024	Timothy Burns	Review disclosure statement reply re US Trustee objection (.3);	0.30	\$336.00
12/17/2024	Timothy Burns	Review disclosure statement reply re the Committee's objection (.3);	0.30	\$336.00
12/18/2024	Jesse Bair	Participate in post-hearing conference with Committee professionals re outcome of disclosure statement hearing and next-steps (.3);	0.30	\$270.00
12/18/2024	Timothy Burns	Continue preparing for disclosure statement hearing (1.8); participate in pre-hearing conference with Committee professionals re disclosure statement hearing strategy (.4);	2.20	\$2,464.00

12/18/2024	Jesse Bair	Continue preparing for disclosure statement hearing, including revising outline re oral argument insurance issues (.6);	0.60	\$540.00
12/18/2024	Timothy Burns	Participate in post-hearing conference with Committee professionals re hearing outcome and next-steps (.3);	0.30	\$336.00
12/18/2024	Jesse Bair	Participate in pre-hearing conference with Committee professionals re disclosure statement hearing strategy (.4);	0.40	\$360.00
12/19/2024	Timothy Burns	Review correspondence with Lowenstein and the Committee re disclosure statement hearing (.1);	0.10	\$112.00
12/19/2024	Jesse Bair	Review and respond to correspondence with Committee professionals re upcoming briefing deadlines and related hearings (.1);	0.10	\$90.00
12/20/2024	Nathan Kuenzi	Identify key materials for review of T. Burns in preparation for Jan. 8 hearing on lift-stay motions (.4);	0.40	\$220.00
12/20/2024	Jesse Bair	Participate in call with Committee professionals re preparing responses to the debtor's settlement comparison charts in its disclosure statement (.3); review and respond to correspondence with Committee professionals re same (.1);	0.40	\$360.00
12/20/2024	Jesse Bair	Participate in conference with T. Burns re preparations for upcoming lift stay and insurance derivative standing motion (.1);	0.10	\$90.00
12/20/2024	Alexander Castro	Prepare hearing preparation binder for T. Burns re motion to lift automatic stay (1.1);	1.10	\$517.00
12/22/2024	Jesse Bair	Review correspondence with state court counsel and Committee professionals re call to discuss ongoing mediation and litigation strategy (.1);	0.10	\$90.00
12/23/2024	Timothy Burns	Participate in additional calls with individual state court counsel re preparations for lift stay hearing (.4);	0.40	\$448.00
12/23/2024	Jesse Bair	Participate in conference with T. Burns re preparations and insurance strategy for lift stay hearing (.2);	0.20	\$180.00
12/23/2024	Timothy Burns	Participate in conference with J. Bair re preparations and strategy for lift stay hearing (.2); additional conference with state court counsel re same (.1);	0.30	\$336.00
12/23/2024	Jesse Bair	Analyze information re debtor and insurer payments in other diocesan cases (.4); begin drafting summary of misleading descriptions in the debtor's settlement comparison charts included in its disclosure statement (.2);	0.60	\$540.00

12/23/2024	Jesse Bair	Provide instructions to N. Kuenzi re preparing the Committee's objection to the debtor's motion to hold the insurance district court action in abeyance (.1);	0.10	\$90.00
12/24/2024	Jesse Bair	Brief review re potential insurance arguments for lift stay reply brief (.1); review and respond to correspondence with B. Wiesenbergs re same (.1);	0.20	\$180.00
12/26/2024	Nathan Kuenzi	Outline opposition to RCBO Abeyance Motion (1.6);	1.60	\$880.00
12/26/2024	Nathan Kuenzi	Research issues relating to motions to stay and/or hold cases in abeyance and Supreme Court precedent (2.5);	2.50	\$1,375.00
12/27/2024	Nathan Kuenzi	Research issues pertaining to stays of actions in the bankruptcy context (.8);	0.80	\$440.00
12/27/2024	Nathan Kuenzi	Begin drafting the Committee's opposition to RCBO Abeyance Motion (1.5);	1.50	\$825.00
12/29/2024	Jesse Bair	Review B. Wiesenbergs correspondence re upcoming insurance-related filings re lift stay issues and derivative insurance motions and preparations for hearing re same (.1);	0.10	\$90.00
12/29/2024	Nathan Kuenzi	Continue drafting the Committee's opposition to RCBO's insurance Abeyance Motion (1.9);	1.90	\$1,045.00
12/29/2024	Nathan Kuenzi	Continue researching issues pertaining to motions to stay cases/hold cases in abeyance relating to RCBO insurance abeyance motion opposition (2.3);	2.30	\$1,265.00
12/30/2024	Timothy Burns	Review and revise opposition to abeyance motion in insurance adversary (4.6);	4.60	\$5,152.00
12/30/2024	Timothy Burns	Begin preparing additional disclosure statement objections (.4);	0.40	\$448.00
12/30/2024	Brian Cawley	Research direct claims by claimant against insurers under California law (2.9);	2.90	\$1,595.00
12/30/2024	Brian Cawley	Compile research and send summary to T. Burns re direct insurance claims (1.6);	1.60	\$880.00
12/30/2024	Timothy Burns	Review draft objection to Debtor's anticipated motion to shorten time (.1);	0.10	\$112.00
12/30/2024	Alexander Castro	Revise and edit the Committee's objection to the Debtor's motion to hold the insurance case in abeyance, with particular focus on factual assertions and legal citations (.9);	0.90	\$423.00
12/30/2024	Jesse Bair	Correspond with BB team re projects needed for completion in connection with completing the Committee's opposition to the debtor's motion to hold the insurance case in abeyance and reply in support of the Committee's insurance derivative standing motion (.1);	0.10	\$90.00

12/30/2024	Nathan Kuenzi	Analyze T. Burns edits to draft Committee opposition to Debtor's Abeyance Motion (.4);	0.40	\$220.00
12/30/2024	Nathan Kuenzi	Draft revised version of the Committee's opposition to RCBO's insurance Abeyance Motion (3.6);	3.60	\$1,980.00
12/31/2024	Timothy Burns	Begin preparing omnibus reply to insurance standing opposition papers (3.1);	3.10	\$3,472.00
12/31/2024	Brian Cawley	Draft omnibus reply to objections to the Committee's insurance adversary proceeding derivative standing motion (4.4);	4.40	\$2,420.00
12/31/2024	Timothy Burns	Review and analysis of motion for relief from stay and insurance standing opposition papers (2.7);	2.70	\$3,024.00
12/31/2024	Jesse Bair	Review and edit draft of the Committee's objection to the Debtor's anticipated motion to compel mediation (.2); review correspondence with Committee professionals re same (.1);	0.30	\$270.00
12/31/2024	Nathan Kuenzi	Review and analyze filings of RCBO and various insurers in opposition to Committee lift stay motion and motion for derivative standing (1.0);	1.00	\$550.00
12/31/2024	Jesse Bair	Review and edit the Committee's objection to the Debtor's motion to hold the insurance case in abeyance (.4)	0.40	\$360.00
12/31/2024	Brian Cawley	Research futility argument for derivative standing brief (1.4);	1.40	\$770.00
12/31/2024	Alexander Castro	Draft sections of the Committee's derivative standing reply brief responding to the debtor's business judgment rule and futility arguments (3.4);	3.40	\$1,598.00
<b>Totals for Insurance Recovery Activities</b>			<b>118.20</b>	<b>\$92,167.00</b>

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<b>Total Hours and Fees</b>	<b>138.00</b>	<b>\$110,230.00</b>
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### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/12/2024	Hotel, N. Kuenzi (2 nights)	\$402.46
12/12/2024	Travel meal, N. Kuenzi	\$4.93
12/12/2024	Travel meal, N. Kunezi	\$5.75
12/12/2024	United Airlines, N. Kuenzi (MSN-SFO, Dec. 12-14)	\$926.08
12/12/2024	United Airlines Inflight Wi-Fi, N. Kuenzi	\$8.00
12/12/2024	Travel meal, N. Kuenzi	\$24.72
12/12/2024	Train, N. Kuenzi (airport to hotel)	\$11.25
12/14/2024	Airport parking, N. Kuenzi	\$30.00

12/14/2024	Travel meal, N. Kuenzi	\$5.30
12/14/2024	Uber, N. Kuenzi (hotel to airport)	\$84.83
12/17/2024	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
12/17/2024	Hotel, T. Burns (2 nights)	\$643.92
12/17/2024	Hotel, J. Bair (2 nights)	\$643.92
12/17/2024	Travel meal, J. Bair	\$18.92
12/17/2024	Uber, T. Burns (airport to hotel)	\$135.00
12/17/2024	Delta Airlines, J. Bair (MSN-SFO, Dec. 17-19)	\$825.95
12/17/2024	United Airlines, T. Burns (MSN-SFO, Dec. 17-19)	\$1,111.32
12/17/2024	Taxi, J. Bair (airport to hotel)	\$73.81
12/18/2024	Travel meal, J. Bair	\$12.30
12/18/2024	Travel meal, J. Bair	\$3.25
12/18/2024	Travel meal, T. Burns	\$29.33
12/18/2024	Travel meal, J. Bair	\$12.41
12/18/2024	Uber, T. Burns, J. Bair (hotel to courthouse)	\$114.06
12/18/2024	Travel meal, T. Burns	\$13.95
12/19/2024	Travel meal, T. Burns	\$19.55
12/19/2024	Travel meal, T. Burns	\$42.85
12/19/2024	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
12/19/2024	Uber, T. Burns (hotel to airport)	\$142.35
12/19/2024	Airport parking, J. Bair	\$30.00
12/19/2024	Uber, J. Bair (hotel to airport)	\$69.30
<b>Total Expenses</b>		<b>\$5,461.51</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	8.80	\$470.00	\$4,136.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	10.60	\$550.00	\$5,830.00
Jesse Bair	Partner	27.60	\$900.00	\$24,840.00
Karen Dempksi	Paralegal	0.20	\$340.00	\$68.00
Nathan Kuenzi	Associate	45.80	\$550.00	\$25,190.00
Timothy Burns	Partner	44.70	\$1,120.00	\$50,064.00

**Total Due This Invoice: \$115,691.51**