

LOWENSTEIN SANDLER LLP

JEFFREY D. PROL (admitted pro hac vice)

jprol@lowenstein.com

BRENT WEISENBERG (admitted pro hac vice)

bweisenberg@lowenstein.com

COLLEEN M. RESTEL (admitted pro hac vice)

crestel@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar No. 151445)

tkeller@kbkllp.com

JANE KIM (Cal. Bar No. 298192)

jkim@kbkllp.com

GABRIELLE L. ALBERT (Cal. Bar No. 190895)

galbert@kbkllp.com

425 Market Street, 26th Floor

San Francisco, California 94105

Telephone: (415) 496-6723

*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

**SUMMARY SHEET TO FIFTH INTERIM
FEE APPLICATION LOWENSTEIN
SANDLER LLP AS COUNSEL TO THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR
ALLOWANCE AND PAYMENT OF
COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM SEPTEMBER
1, 2024 THROUGH AND INCLUDING
DECEMBER 31, 2024**

Judge: Hon. William J. Lafferty

Date: April 30, 2025

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

Place: United States Bankruptcy Court

1300 Clay Street, Courtroom 220

Oakl:

Objec:



SUMMARY COVER SHEET TO FIFTH INTERIM FEE APPLICATION

Name of Applicant	Lowenstein Sandler LLP
Name of client	Official Committee of Unsecured Creditors
Time period covered by application	09/01/24 to 12/31/24
Total compensation sought this period	\$1,387,687.00
Total expenses sought this period	\$40,849.57
Petition Date	May 8, 2023
Retention date	July 8, 2023, effective as of May 30, 2023
Date or order approving employment	July 8, 2023
Total compensation approved by interim order to date	\$4,331,885.91
Total expenses approved by interim order to date	\$154,579.85
Total allowed compensation paid to date	\$4,331,885.91
Total allowed expenses paid to date	\$154,579.85
Blended rate in this application for all attorneys	\$908.32
Blended rate in this application for all timekeepers	\$894.82
Compensation sought in this application already paid pursuant to a monthly compensation order but not yet allowed	\$779,100.00
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed	\$23,150.12
Number of professionals (attorneys) included in this application	13
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 application period	The fees sought in this Application do not exceed the fees budgeted for the time period covered.
Number of professionals (attorneys) billing fewer than 15 hours to the case during this period	4
Are any rates higher than those approved or disclosed at retention? If yes, calculate the amount of compensation attributable to any rate increase	No.

SUMMARY OF MONTHLY FEE STATEMENTS

Date Filed	Period Covered	Requested Fees	Requested Expenses	Paid Fees	Paid Expenses	Holdback Fees Requested
10/30/2024 [Dkt. 1429]	9/1/2024 – 9/30/2024	\$180,800.50	\$5,283.88	\$144,640.40	\$5,283.88	\$36,160.10
11/27/2024 [Dkt. 1485]	10/1/2024 – 10/31/2024	\$238,073.50	\$6,729.89	\$190,458.80	\$6,729.89	\$47,614.70
12/23/2024 [Dkt. 1558]	11/1/2024 – 11/30/2024	\$555,001.00	\$11,136.35	\$444,000.80	\$11,136.35	\$111,000.20
1/30/2025 [Dkt. 1677]	12/1/2024 – 12/31/2024	\$413,812.00	\$17,699.45	\$0.00	\$0.00	\$431,511.45*
Total	9/1/2024 – 12/31/2024	\$1,387,687.00	\$40,849.57	\$779,100.00	\$23,150.12	\$277,537.40

*As of the date of this filing, no payments have been made on account of Lowenstein Sandler's Nineteenth Monthly Fee Statement (the "Nineteenth Monthly Fee Statement") [Docket No. 1677], therefore, by this Application, Lowenstein Sandler is requesting payment of the full amount of fees and expenses requested therein. If Lowenstein Sandler receives any payment on account of the Nineteenth Monthly Fee Statement prior to the hearing on this Application, Lowenstein Sandler will reduce the amount requested herein accordingly.

Summary of Any Objections to Monthly Fee Statements: None.

LOWENSTEIN SANDLER LLP

JEFFREY D. PROL (admitted pro hac vice)

jprol@lowenstein.com

BRENT WEISENBERG (admitted pro hac vice)

bweisenberg@lowenstein.com

COLLEEN M. RESTEL (admitted pro hac vice)

crestel@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar No. 151445)

tkeller@kbkllp.com

JANE KIM (Cal. Bar No. 298192)

jkim@kbkllp.com

GABRIELLE L. ALBERT (Cal. Bar No. 190895)

galbert@kbkllp.com

425 Market Street, 26th Floor

San Francisco, California 94105

Telephone: (415) 496-6723

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

**FIFTH INTERIM FEE APPLICATION
LOWENSTEIN SANDLER LLP AS
COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM SEPTEMBER 1,
2024 THROUGH AND INCLUDING
DECEMBER 31, 2024**

1 Lowenstein Sandler LLP (“**Lowenstein**”), counsel to the Official Committee of
2 Unsecured Creditors (the “**Committee**”) of the Roman Catholic Bishop of Oakland (the
3 “**Debtor**”) in the above captioned chapter 11 case (the “**Chapter 11 Case**”) files this Fifth
4 Interim Fee Application (this “**Application**”), under sections 330 and 331 of chapter 11 of title
5 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of
6 Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *United States Trustee Appendix B*
7 *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed*
8 *Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013,
9 the *Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees for*
10 *the Northern District of California*, dated February 19, 2014 (the “**UST Guidelines**”), and the
11 *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of*
12 *Professionals* [Dkt. 170], for interim approval and allowance of (i) compensation for
13 professional services rendered to the Committee from September 1, 2024 through December 31,
14 2024 (the “**Compensation Period**”) and (ii) reimbursement of expenses incurred in connection
15 with such services, and, in support, represents as follows:

16 **I.**

17 **THE UST GUIDELINES**

18 1. The Office of the United States Trustee (the “**UST**”) established the UST
19 Guidelines. In turn, the UST promulgated forms to aid in compliance with the UST Guidelines.
20 Charts and tables based on such forms, and certain other exhibits, are attached and filled out with
21 data to the extent relevant to this Chapter 11 Case:

22 **Exhibit A:** Customary and Comparable Compensation Disclosures with Fee
23 Applications;
24 **Exhibit B:** Summary of Timekeepers in this Application;
25 **Exhibit C:** Budget and Staffing Plan;
26 **Exhibit D:** Summary of Compensation by Project Category;
27 **Exhibit E:** Summary of Expense Reimbursement Requested by Category;
28 **Exhibit F:** Summary Cover Sheet of Fee Application;
Exhibit G: Declaration of Counsel; and
Exhibit H: Detailed time records for the Compensation Period.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

II.

PRELIMINARY STATEMENT

2. Throughout the Compensation Period, Lowenstein's team of bankruptcy and litigation attorneys have continued their work to protect and enforce the rights of survivors of sexual abuse ("**Survivors**"). Lowenstein's services to the Committee during the Compensation Period required it to address many issues of importance to its client and its constituency, including:

3. First, Lowenstein spent time preparing for and attending several mediation sessions and court conferences and hearings.

4. Second, the Committee continued its development of a litigation strategy to recover assets of the estate, investigating the acts, conduct, assets, liabilities, and financial condition of the Debtor, the operation of the Debtor's churches and related entities. To that end, Lowenstein attorneys drafted and filed two standing motions, two adversary proceedings and a lift stay motion.

5. Third, Lowenstein spent time reviewing and analyzing the Plan of Reorganization (the "**Plan**") and Disclosure Statement (the "**Disclosure Statement**") filed by the Debtor, prepared and filed an Objection to the adequacy of the Disclosure Statement, and attended a hearing on the Adequacy of the Disclosure Statement.

6. Fourth, Lowenstein spent time communicating with Committee members and state court counsel on an almost weekly basis to keep them abreast of developments in the case.

III.

JURISDICTION

7. This Court has jurisdiction over this Application 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 Local Rules. This is a core proceeding under 28 U.S.C. §157(b)(2). Venue of this proceeding and this Application in this Court is proper under 28 U.S.C. §§1408 and 1409.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IV.

BACKGROUND

8. On May 8, 2023, the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor continues to operate as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code.

9. On May 23, 2023, the UST, under section 1102(a)(1) of the Bankruptcy Code, appointed nine Survivors holding claims against the Debtor to serve on the Committee. The Committee is charged with representing the interests of all Survivors in this Chapter 11 Case.

10. On May 30, 2023, the Committee selected Lowenstein as its lead counsel. The Committee then selected Keller Benvenuti Kim LLP as local counsel. On July 14, 2023, the Committee selected Burns Bair to serve as special insurance counsel.

11. On July 8, 2023, the Court entered the *Order Authorizing Retention of Lowenstein Sandler LLP as Lead Counsel to the Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland Effective as of May 30, 2023* [Dkt. 205] (the “**Retention Order**”).

12. The Retention Order authorizes the Debtor to compensate and reimburse Lowenstein in accordance with the Bankruptcy Code, the Bankruptcy Rules, the UST Guidelines, and the Interim Compensation Order.

13. Under the Retention Order, the services to be provided by Lowenstein to the Committee include:

- (i) advising the Committee with respect to its rights, duties, and powers in this Chapter 11 Case;
- (ii) assisting and advising the Committee in its consultations and communications with the Debtor concerning administration of this Chapter 11 Case;
- (iii) assisting the Committee in analyzing the claims of the Debtor’s creditors, including negotiating and mediating issues relating to the value and payment of claims held by the Committee’s constituency, which is comprised of Survivors;
- (iv) assisting the Committee in analyzing the Debtor’s capital structure;
- (v) assisting the Committee in its investigation of the acts, conduct, assets liabilities, and financial condition of the Debtor and of the operation of the Debtor;

- 1 (vi) assisting the Committee in its investigation of the liens and claims of the holders
2 of the Debtor's prepetition debt and the prosecution of any claims or causes of
3 action revealed by such investigation;
- 4 (vii) assisting the Committee in its analysis of, and negotiations with, the Debtor or
5 any third party concerning matters related to, among other things, the assumption
6 or rejection of certain leases of nonresidential real property and executory
7 contracts, asset dispositions, financing of other transactions and the terms of any
8 chapter 11 plans for the Debtor and accompanying disclosure statements and
9 related plan documents;
- 10 (viii) assisting the Committee in its analysis of insurance policies procured by the
11 Debtor and negotiations with the underlying insurers concerning all matters
12 related to same;
- 13 (ix) assisting and advising the Committee as to its communications with
14 Survivors regarding significant matters in this Chapter 11 Case;
- 15 (x) representing the Committee at hearings and other proceedings;
- 16 (xi) reviewing and analyzing applications, orders, statements of operations, and
17 schedules filed with this Court and advising the Committee with respect to same;
- 18 (xii) assisting the Committee in preparing pleadings and applications as may be
19 necessary in furtherance of the Committee's interests and objectives;
- 20 (xiii) preparing, on behalf of the Committee, any pleadings, including, without
21 limitation, motions, memoranda, complaints, adversary complaints, objections,
22 or comments in connection with any of the foregoing as may be necessary in
23 furtherance of the Committee's interests and objectives in this Chapter 11 Case,
24 including, without limitation, the preparation of retention applications and fee
25 applications for the Committee's professionals, including Lowenstein; and
- 26 (xiv) performing such other legal services as may be required or are otherwise deemed
27 to be in the interests of the Committee in accordance with the Committee's
28 powers and duties under the Bankruptcy Code, Bankruptcy Rules, or other
applicable law.

22 V.

23 **SUMMARY OF PROFESSIONAL COMPENSATION AND** 24 **REIMBURSEMENT OF EXPENSES REQUESTED**

25 14. During the Compensation Period, Lowenstein's professionals and
26 paraprofessionals expended 1,550.80 hours in connection with providing necessary services to
27 the Committee. Lowenstein has been able to efficiently provide services by using the expertise
28 of professionals and paraprofessionals within relevant practice groups to effectively advise the
Committee regarding discrete issues and ensure that the level of seniority is commensurate with

1 the work being performed. In connection with services rendered on behalf of the Committee,
2 Lowenstein requests allowance of reasonable compensation in the total amount of
3 \$1,387,687.00, and reimbursement of actual and necessary expenses incurred in the amount of
4 \$40,849.57, for an aggregate total of \$1,428,536.57 for the Compensation Period.

5 15. There is no agreement or understanding between Lowenstein and any other
6 person, other than members of the firm, for the sharing of compensation to be received for
7 services rendered in this Chapter 11 Case. Except as set forth below with respect to payments
8 Lowenstein may receive under the Interim Compensation Order, during the Compensation
9 Period, Lowenstein received no payment and no promises of payment from any source for
10 services rendered or to be rendered in any capacity in connection with the matters covered by
11 this Application.

12 16. Lowenstein agreed to reduce its hourly rates for the benefit of the Committee's
13 constituency (holders of sexual abuse claims against the Debtor). In order to ensure that any
14 price reduction inures solely to the benefit of the Committee's constituency, Lowenstein will
15 hold ten percent of all fees received in this Chapter 11 Case in a trust account to benefit sexual
16 abuse claimants. The funds will be held until a trust is established through a plan of
17 reorganization. If no such trust is created, the funds will be donated to a child advocacy
18 organization to be selected by the Committee at the end of the Chapter 11 Case.

19 17. Other than the foregoing discount: (i) the fees charged by Lowenstein in this
20 Chapter 11 Case were billed in accordance with its existing billing rates and procedures in effect
21 during the Compensation Period and (ii) these rates are the same rates Lowenstein charges for
22 services rendered by its attorneys and paraprofessionals in comparable matters and are
23 reasonable given the compensation charged by comparably skilled practitioners in similar
24 matters in both the California and national markets.

25 18. Lowenstein maintains computerized time records, which have been filed on the
26 docket with its monthly fee statements and furnished to the Debtor and the UST in the format
27 specified by the Interim Compensation Order. As discussed above, detailed time records for the
28 Compensation Period are attached as **Exhibit H**.

19. The Committee has reviewed the Interim Application and has approved the fees and expenses requested.

VI.

SUMMARY OF SERVICES PERFORMED BY LOWENSTEIN
DURING THE COMPENSATION PERIOD

20. During the Compensation Period, Lowenstein rendered professional services to the Committee solely in connection with this Chapter 11 Case and, on behalf of the Committee, in accordance with Lowenstein's professional responsibilities. The services performed were necessary to the administration of this Chapter 11 Case and were beneficial at the time at which the services were rendered. All services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed. Recitation of every item of the professional services performed by Lowenstein during the Compensation Period would be unduly burdensome. Thus, the following summary highlights meaningful issues to which Lowenstein devoted time and attention during the Compensation Period. This summary is organized in accordance with Lowenstein's internal system of project categories.

Adversary Proceedings and Bankruptcy Court Litigation (513.30 hours; \$448,346.50).

21. This category includes, among other things, time spent by Lowenstein developing a litigation strategy to recover assets of the estate and investigating the acts, conduct, assets, liabilities, and financial condition of the Debtor, the operation of the Debtor's churches and related entities. To that end, Lowenstein attorneys:

- (i) Continued their review of documents produced by the Debtor, including documents related to restricted assets and real estate holdings;
- (ii) Conducted extensive legal research and drafted legal memoranda and analyses regarding: (a) claims and causes of action to recover assets of the estate; (b) obtaining derivative standing to pursue claims on behalf of the Debtor's estate and related cost benefit analysis; (c) substantive consolidation; (d) lifting the automatic stay to allow Survivors' personal injury lawsuits to proceed in State Court; and (e) alternative methods of resolving mediation stalemates;

- 1 (iii) Developed a litigation case strategy, including factual bases and legal theories
2 relating to claims and causes of action against the churches, the Oakland
Parochial Fund, and the and bond obligated group;
- 3 (iv) Prepared for and participated in meet and confer with the Debtor's insurers
4 regarding *Fifth Amended Complaint for Declaratory Judgment Relief and Breach*
5 *of Statutory Duty*, relating to the consolidated insurance adversary proceedings
6 *In re Roman Cath. Bishop of Oakland Ins.*, regarding the consolidated cases (Case
No. 24-00709 and 24-00711) filed in the District Court, and attended a status
conference before the Honorable Jacqueline Scott Corley;
- 7 (v) Drafted and filed: *Motion of the Official Committee of Unsecured Creditors to*
8 *Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to*
9 *Proceed in State Court* [Docket No. 1460] (the "**Lift Stay Motion**"), together
with related pleadings
- 10 (vi) Drafted and filed: *The Official Committee of Unsecured Creditors' Motion For*
11 *Standing to Prosecute Claims of the Debtor's Estate* [Docket No. 1462] (the
"**Standing Motion**"), together with exhibits and related pleadings;
- 12 (vii) Drafted and filed the: (a) Adversary Complaint for Declaratory Relief (*Committee*
13 *v. The Roman Catholic Bishop of Oakland, the Oakland Parochial Fund, Inc.,*
14 *and John Doe Churches 1-82*), Adv. Pro. No. 24-04051 (the "**OPF Complaint**");
15 and (b) Adversary Complaint for Declaratory Relief (*Committee v. The Roman*
16 *Catholic Bishop of Oakland, Adventus, The Roman Catholic Welfare*
17 *Corporation of Oakland, and the Roman Catholic Cemeteries of the Diocese of*
18 *Oakland*), Adv. Pro. No. 24-04053 (the "**BOG Complaint**"), together with
19 exhibits and related pleadings;
- 20 (viii) Drafted and filed: *The Official Committee of Unsecured Creditors' Motion (I)*
21 *For Standing to Assert, Prosecute and Compromise All Claims and Causes of*
22 *Action the Debtor and its Estate Hold Against the Insurers and (II) To Be*
23 *Substituted as the Named Plaintiff in the Insurance Coverage Actions* [Docket
24 No. 1538] (the "**Insurer Standing Motion**"), together with exhibits and related
25 pleadings
- 26 (ix) Reviewed and analyzed the Motion to Intervene in the American Home
27 Adversary Proceeding (Adv. Pro. No. 23-04037), and addressed discovery
28 disputes raised in the insurance adversary proceeding (Adv. Pro. No. 23-04028);
- 23 (x) Reviewed the Debtor's Motion to Adjourn the Lift Stay Motion and the Standing
24 Motion, conducted legal research, and drafted Objection to same;
- 25 (xi) Drafted Stipulations Extending Time for Response to the OPF Complaint and
26 BOG Complaint;
- 27 (xii) Reviewed and analyzed responses and opposition briefs to Lift Stay Motion and
28 Standing Motion and drafted replies;

///

1 **Court Hearings** (85.50 hours; \$85,340.50).

2 22. Time billed to this category is for attorney time spent preparing for and attending
3 various court hearings on behalf of the Committee, including, but not limited to, status
4 conferences and hearings held in the lead case, the District Court case and in the adversary
5 proceedings. Specifically: (i) the hearings held in the District Court before the Honorable
6 Jacqueline Scott Corley on October 2, 2024 and November 26, 2024 regarding the consolidated
7 cases (Case No. 24-00709 and 24-00711); (ii) the October 15, 2024 status conference regarding
8 the Survivor Statement Motion; (iii) the October 24, 2024 hearing regarding the Committee's
9 Survivor Statement Motion; (iv) the November 4, 2024 and December 13, 2024 status
10 conferences regarding Survivor Statements; (v) the November 27, 2024 hearing to consider the
11 Debtor's Motion to Adjourn the Lift Stay Motion and the Standing Motion; (vi) the December
12 11, 2024 hearing to consider Interim Fee Applications; and (vii) the December 18, 2024
13 Disclosure Statement Hearing.

14 **Claims Administration and Objections** (59.40 hours; \$35,832).

15
16 23. During the Compensation Period, Lowenstein continued in its analysis of
17 Survivor claims and the valuation thereof, including but not limited to: (i) conducting research
18 regarding claims valuation and drafting claims valuation and estimation memorandum; (ii)
19 communicating with the insurers regarding request for access to unredacted proofs of claim and
20 confidential information; (iii) drafting a stipulation to modify the Bar Date Order and proposed
21 revisions to the Expert Claim Order; and (iv) reviewing and analyzing claims filed by Survivors.
22 In addition, Lowenstein also reviewed and analyzed the OPF claim, developed a strategy
23 regarding objection to same, and drafted an objection to the OPF claim.

24 **Mediation** (280.60 hours; \$274,533.50)

25 24. This category includes, among other things, time spent by Lowenstein in
26 connection with preparation for mediation sessions and development of mediation strategies.
27 Time spent in this category includes, but is not limited to: (i) preparing mediator presentations;
28 (ii) analyzing comparable settlements, compiling data and facts supporting settlement demand;

(iii) conferring with the mediator, the Committee and others before mediation; (iv) participating in several mediation sessions held in Chicago on September 10 and 11, 2024, the virtual sessions held on September 30 and October 2, 2024, the sessions held in San Francisco on October 16 and October 17, 2024, and the insurer mediation held on October 22, 2024; (v) developing, refining and revising a settlement strategy; (vi) reviewing claim valuations, analyses and related documents for proposal of counter-offer and drafting same; (vii) drafting motion for status conference to permit survivor statements, reviewing and analyzing insurer objections, drafting reply with supporting brief, and responding to sur-reply in opposition; (viii) developing strategy with respect to real estate disposition issues, reviewing real estate valuations, and conferring with real estate consultant regarding same; (ix) refining a plan implementation strategy and reviewing plan structure options; (x) developing protocols for presentation of survivor statements; and (xi) drafting objection to Mediation Motion and Motion to Shorten Time on Mediation Motion.

Meetings of and Communication with Creditors (124.70 hours; \$128,152.00).

25. Lowenstein spent extensive time communicating with Committee members and their state court counsel to discuss all issues germane to this case, including but not limited to the following: (i) developing a mediation strategy and preparing for mediation sessions; (ii) preparing a presentation to the Committee summarizing mediation strategy and participating in several zoom meetings and conference calls to prepare for and discuss mediation and claims analysis with the Committee; (iii) meeting with the Committee to prepare for the hearing to consider Survivor Statements and Disclosure Statement hearings, and debriefing sessions following the hearings; and (iv) summarizing prospective settlement scenarios, and ultimately the Debtor's settlement proposal.

Plan and Disclosure Statement (314.10 hours; \$278,012.50).

26. Lowenstein spent extensive time developing a course of action and strategizing regarding the Plan and Disclosure Statement, including but not limited to: (i) reviewing and analyzing the Plan and Disclosure Statement; (ii) revising the Child Protection Protocols; (iii) conducting research on various issues including Plan implementation mechanisms, hypothetical

1 liquidation test, the absolute priority rule, the intersection of bankruptcy and religious freedom,
2 property of the estate issues, artificial impairment, Ninth Circuit caselaw regarding confirmation,
3 and classification of claims and voting rights; (iv) drafting an objection to the Disclosure
4 Statement; (v) strategizing regarding confirmation discovery, including researching prior
5 diocesan cases, outlining discovery topics for contested confirmation, drafting plan confirmation
6 discovery; (vi) reviewing and analyzing recent decisions relating to insurer standing in
7 preparation for confirmation litigation; (viii) preparing for the Disclosure Statement hearing;
8 (ix) drafting a Committee letter recommending that Survivors reject the Plan; and (x) reviewing
9 and analyzing trust distribution procedures and the trust agreement.

10 **Relief from Stay/Adequate Protection Proceedings** (113.50 hours; \$97,443.00).

11 27. This category includes time spent by Lowenstein addressing automatic stay
12 issues, including but not limited to the following: (i) developing a strategy with respect to the
13 scope of the automatic stay specifically aimed at lifting the automatic stay to Survivors' personal
14 injury claims to proceed in state court; (ii) conducting research and investigative analysis on
15 various issues including reviewing caselaw from prior diocesan cases relating lifting the
16 automatic stay (iii) preparing and filing the Lift Stay Motion; and (iv) reviewing objections to
17 Lift Stay Motion, and drafting a reply in support of the Lift Stay Motion.

18 **VII.**

19 **ACTUAL AND NECESSARY EXPENSES**

20 28. Lowenstein incurred reasonable and necessary out-of-pocket expenses in the sum
21 of \$40,849.57 in connection with rendering legal services to the Committee during the
22 Compensation Period. A description of the expenses is set forth in **Exhibit E**. The
23 disbursements are itemized in the annexed schedule. These disbursements were necessary to
24 effectively render legal services in this Chapter 11 Case.

25 29. During this Chapter 11 Case, Lowenstein has incurred and paid its actual and
26 necessary disbursements and expenses.

27 ///

VIII.

THE REQUESTED COMPENSATION SHOULD BE ALLOWED

30. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court's award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

31. In determining the amount of reasonable compensation to be awarded, the court should consider the nature, extent, and the value of such services, considering all relevant factors, including—

- (i) the time spent on such services;
- (ii) the rates charged for such services;
- (iii) Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (iv) Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (v) With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (vi) Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

32. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (a) the complexity of this Chapter 11 Case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the cost of comparable services other than in a case under this title.

33. In sum, the services rendered by Lowenstein were necessary and beneficial to the Debtor's estates and were consistently performed timely commensurate with the types of issues involved in this Chapter 11 Case. Accordingly, approval of the compensation for professional services and reimbursement of expenses sought in this Application is warranted.

IX.

NOTICE

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

WHEREFORE, Lowenstein requests that the Court enter an order: (i) allowing Lowenstein (a) interim compensation for professional services rendered as counsel for the Committee during the Compensation Period in the amount of \$1,387,687.00; and (b) reimbursement of reasonable and necessary expenses incurred in the amount of \$40,849.57 for a total award of \$1,428,536.57; and (ii) granting any other relief that the Court deems just and proper.

Dated: February 14, 2024

LOWENSTEIN SANDLER LLP

By: Jeffrey D. Prol
Jeffrey D. Prol
Brent Weisenberg
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone: (973) 597-2500
Facsimile: (973) 597-2400

*Counsel for the Official Committee
of Unsecured Creditors*

EXHIBIT A

**Customary and Comparable Compensation Disclosures with
Fee Applications**

Category of Timekeeper (using categories already maintained by the firm)	BLENDED HOURLY RATE	
	Billed Preceding Year, Excluding Bankruptcy	Billed This Fee Application
Partner	\$1,082.05	\$1,033.63
Counsel	\$818.17	\$902.40
Associate	\$615.83	\$583.34
Paralegal	\$365.77	\$340.73
Research Services	\$300.85	\$345.00
All Timekeepers Aggregated	\$806.39	\$894.82

Lowenstein Sandler’s hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. The “Blended Hourly Rate – Billed Preceding Year, Excluding Bankruptcy” (the “**BHREB**”) noted above reflects the firm’s blended hourly rate billed for calendar year 2024 excluding bankruptcy related work, but including all alternative fee arrangements other than contingency fee cases. In calendar year 2024, the firm increased its billing rates on January 1st in accordance with its normal practice. The BHREB also represents the billed rate across a larger, more expansive population of the firm’s attorneys with a multitude of rates that are impacted by a number of factors, including level of experience, complexity of the work and office location. For example, approximately 32% of Lowenstein Sandler’s attorneys are based in New York, while approximately 57% are based in NJ, approximately 7% are based in California and Utah, and 4% are based in Washington DC. Thus, the “Blended Hourly Rate – Billed This Fee Application” is a function of, among other things, the experience and location of the subset of attorneys delivering the services and the sophistication and complexity of the specific matter.

Case Name: The Roman Catholic Bishop of Oakland

Case Number: 23-40523 (WJL)

Applicant's Name: Lowenstein Sandler LLP

Date of Application: February 14, 2025

Interim or Final: Fifth Interim

EXHIBIT B**Summary of Timekeepers Included in this Fee Application**

Name	Title	Department	Date of 1st Admission	Fees Billed	Hours Billed	Number of Rate Increases	Hourly Rate Billed	
							In This Application	In First Interim Application
Fulfree, Nicole	Partner	Bankruptcy	2014	\$147,888.00	142.20	0	\$1,040.00	\$1,040.00
Kaplan, Michael A.	Partner	Litigation	2011	\$60,260.50	63.10	0	\$955.00	\$955.00
Prol, Jeffrey D.	Partner	Bankruptcy	1990	\$361,977.00	313.40	0	\$1,155.00	\$1,155.00
Restel, Colleen M.	Partner	Bankruptcy	2015	\$14,051.50	15.70	0	\$895.00	\$895.00
Weisenberg, Brent I.	Partner	Bankruptcy	2002	\$528,840.00	542.40	0	\$975.00	\$975.00
Gross, Philip J.	Counsel	Bankruptcy	2008	\$10,447.50	10.50	0	\$995.00	\$995.00
Mannix, Erica G.	Counsel	Bankruptcy	2019	\$9,676.00	11.80	0	\$820.00	\$820.00
Clark, Brittany M.	Associate	Bankruptcy	2023	\$12,807.50	23.50	0	\$545.00	\$545.00
Dernbach, Christopher	Associate	Litigation	2021	\$5,340.00	8.90	0	\$600.00	\$600.00
Frankel, Chelsea	Associate	Bankruptcy	2024	\$79,310.00	154.00	0	\$515.00	\$515.00
Gauvin, Carolyn	Associate	Bankruptcy	2024	\$60,225.00	109.50	0	\$550.00	\$550.00
Matthews, Nicholas Stratton	Associate	Litigation	2023	\$3,422.00	5.80	0	\$590.00	\$590.00
Seltzer, Eric James	Associate	Bankruptcy	2022	\$80,866.50	113.10	0	\$715.00	\$715.00
Claussen, Diane	Associate	Bankruptcy	N/A	\$10,132.00	29.80	0	\$340.00	\$340.00
Lawler, Elizabeth B.	Paralegal	Bankruptcy	N/A	\$1,621.50	4.70	0	\$345.00	\$345.00
Pagano, Jamie J.	Paralegal	Practice Support	N/A	\$401.50	1.10	0	\$365.00	\$365.00
Suhail, Aneela	Paralegal	Practice Support	N/A	\$213.50	0.70	0	\$305.00	\$305.00
Hayter, Carrie T.	Research Services	Practice Support	N/A	\$207.00	0.60	0	\$345.00	\$345.00

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-40523 (WJL)
Applicant's Name: Lowenstein Sandler LLP
Date of Application: February 14, 2025
Interim or Final: Fifth Interim

EXHIBIT C
Budget for Fifth Interim Period from
September 1, 2024 through December 31, 2024

Project Category	Estimated Hours		Estimated Fees ¹	
	Low	High	Low	High
Adversary Proceedings and Bankruptcy Court Litigation	250	300	\$181,250.00	\$217,500.00
Appeals	35	50	\$25,375.00	\$36,250.00
Asset Analysis and Recovery	100	150	\$72,500.00	\$108,750.00
Asset Disposition	0	5	\$0.00	\$3,625.00
Assumption/Rejection of Leases and Contracts	0	5	\$0.00	\$3,625.00
Avoidance Action Analysis	0	5	\$0.00	\$3,625.00
Business Operations	0	5	\$0.00	\$3,625.00
Case Administration	20	30	\$14,500.00	\$21,750.00
Claims Administration and Objections	40	60	\$29,000.00	\$43,500.00
Court Hearings	120	130	\$87,000.00	\$94,250.00
Employee Benefits/Pensions	0	5	\$0.00	\$3,625.00
Employment and Retention Applications - Others	0	5	\$0.00	\$3,625.00
Fee Applications and Invoices - Others	5	15	\$3,625.00	\$10,875.00
Fee/Employment Applications	30	45	\$21,750.00	\$32,625.00
Fee/Employment Objections	0	5	\$0.00	\$3,625.00
Financing/Cash Collateral	0	5	\$0.00	\$3,625.00
Investigation of Prepetition Lenders	0	0	\$0.00	\$0.00
Mediation	400	600	\$290,000.00	\$435,000.00
Meetings of and Communication with Creditors	150	200	\$108,750.00	\$145,000.00
Non-Working Travel	0	0	\$0.00	\$0.00
Plan and Disclosure Statement	325	375	\$235,625.00	\$271,875.00
Other - Insurance Matters	75	125	\$54,375.00	\$90,625.00

¹ Lowenstein Sandler's estimated fees are calculated at the rate of \$725 per hour.

Case Name: The Roman Catholic Bishop of Oakland

Case Number: 23-40523 (WJL)

Applicant's Name: Lowenstein Sandler LLP

Date of Application: February 14, 2025

Interim or Final: Fifth Interim

Project Category	Estimated Hours		Estimated Fees ¹	
	Low	High	Low	High
Other Contested Matters (excluding assumption/rejection motions)	20	40	\$14,500.00	\$29,000.00
Relief from Stay/Adequate Protection Proceedings	25	40	\$18,125.00	\$29,000.00
Schedules and Statements	0	0	\$0.00	\$0.00
Tax Issues	0	0	\$0.00	\$0.00
Valuation	0	0	\$0.00	\$0.00
TOTAL	1595	2200	\$1,156,375.00	\$1,595,000.00

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

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-40523 (WJL)
Applicant's Name: Lowenstein Sandler LLP
Date of Application: February 14, 2025
Interim or Final: Fifth Interim

EXHIBIT C
**Staffing Plan for Fourth Interim Period from
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	5-7	\$690-\$1,835
Counsel	2-3	\$575-\$1,070
Associate	8-10	\$475-\$965
Paralegal	1-2	\$240-\$425

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

Case Name: The Roman Catholic Bishop of Oakland

Case Number: 23-40523 (WJL)

Applicant's Name: Lowenstein Sandler LLP

Date of Application: February 14, 2025

Interim or Final: Fifth Interim

EXHIBIT D

Summary of Compensation Requested by Project Category

Project Category	Hours Billed	Fees Sought
Adversary Proceedings and Bankruptcy Court Litigation	513.30	\$448,346.50
Appeals	0.40	\$136.00
Asset Analysis and Recovery	7.00	\$5,607.00
Business Operations	0.60	\$585.00
Case Administration	5.80	\$1,972.00
Claims Administration and Objections	59.40	\$35,832.00
Court Hearings	85.50	\$85,340.50
Employment and Retention Applications - Others	4.00	\$3,273.50
Fee Applications and Invoices - Others	1.90	\$1,852.50
Fee/Employment Applications	23.30	\$10,182.50
Mediation	280.60	\$274,533.50
Meetings of and Communication with Creditors	124.70	\$128,152.00
Other - Insurance Matters	16.70	\$16,418.50
Plan and Disclosure Statement (including Business Plan)	314.10	\$278,012.50
Relief from Stay/Adequate Protection Proceedings	113.50	\$97,443.00
TOTAL	1,550.80	\$1,387,687.00

Case Name: The Roman Catholic Bishop of Oakland

Case Number: 23-40523 (WJL)

Applicant's Name: Lowenstein Sandler LLP

Date of Application: February 14, 2025

Interim or Final: Fifth Interim

EXHIBIT E

Summary of Expense Reimbursement Requested by Category

Category	Amount
Computerized legal research	\$13,783.05
Filing fees	\$21.00
Professional services	\$141.30
Searches	\$2.99
Telecommunications	\$610.92
Travel	\$19,586.07
Meals	\$5,960.71
Document conversion and scanning services	\$743.53
TOTAL DISBURSEMENTS	\$40,849.57

EXHIBIT E – CONTINUED – Expense Detail

Date	Description	Amount
<u>Document conversion and scanning services</u>		
09/26/24	eDiscovery Review (VENDOR: Relativity DATE:2024-09-26 34.42 GB eDiscovery Review)	\$185.87
10/26/24	eDiscovery Review (VENDOR: Relativity DATE:2024-10-26 34.42 GB eDiscovery Review)	\$185.87
11/26/24	eDiscovery Review (VENDOR: Relativity DATE:2024-11-26 34.42 GB eDiscovery Review)	\$185.87
12/26/24	eDiscovery Review (VENDOR: Relativity DATE:2024-12-26 34.43 GB eDiscovery Review)	\$185.92
<u>Filing fees</u>		
11/21/24	Filing Fees (VENDOR: American Express INVOICE#: 7097626512310321 DATE: 12/31/2024 ; 11/21/24; Filing Fees; E-filing)	\$21.00
<u>Meals</u>		
09/10/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. Breakfast on September 10th before mediation in Chicago in September 10th, 2024)	\$13.41
09/10/24	Meals (out of town travel) (VENDOR: Prol, Jeffrey D. Hotel - Dinner; Attend mediation in Chicago)	\$55.17
09/11/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent Dinner for flight for trip to EWR after Mediation on September 10th and 11th, 2024)	\$14.45
09/11/24	Meals (out of town travel) (VENDOR: Prol, Jeffrey D. Dinner; Attend mediation in Chicago)	\$16.68
10/14/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. 10/14/24; Hotel - Breakfast)	\$19.93
10/14/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. 10/14/24; Hotel - Dinner)	\$23.90
10/16/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. Hotel - Breakfast)	\$17.22
10/17/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. 10/17/24; Dinner)	\$14.87
11/03/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. Hotel - Dinner during attendance at RCBO Survivor Status Conference on November 4, 2024.)	\$62.33
11/03/24	Meals (out of town travel) (VENDOR: Prol, Jeffrey D. Dinner; Attend Oakland Conference in CA)	\$60.95
11/04/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. Dinner; Dinner before flight from EWR to Home after attendance at RCBO Survivor Status Conference on November 4, 2024.)	\$14.87
11/04/24	Meals (out of town travel) (VENDOR: American Express RCBO Oakland Diocese Meeting - Light dinner after Survivor Statement Conference Hearing with speakers, their counsel and Committee members. Approximately 20 individuals in attendance. Meeting was held to debrief Speakers and Committee on the day's events.)	\$2,445.00
11/04/24	Meals (out of town travel) (VENDOR: American Express - Taxes in connection with lunch and light dinner before/ after Survivor Statement Conference Hearing with	\$697.67

speakers, their counsel and Committee members. Approximately 20 individuals in attendance.)

11/04/24	Meals (out of town travel) (VENDOR: American Express RCBO Oakland Diocese Meeting - Lunch during pre- Survivor Statement Conference Hearing meeting with speakers, their counsel and Committee members. Approximately 20 individuals in attendance. Meeting was held to assist Speakers in preparing for the hearing.)	\$2,250.00
11/04/24	Meals (out of town travel) (VENDOR: Prol, Jeffrey D. Dinner; Attend Oakland Conference in CA)	\$33.87
11/04/24	Meals (out of town travel) (VENDOR: Prol, Jeffrey D. Breakfast; Attend Oakland Conference in CA)	\$14.13
11/05/24	Meals (out of town travel) (VENDOR: Prol, Jeffrey D. Breakfast; Attend Oakland Conference in CA)	\$28.66
12/12/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. - Dinner attendance at RCBO Survivor Status Conference on December 13, 2024.)	\$51.68
12/13/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. Breakfast before attendance at RCBO Survivor Status Conference on December 13, 2024.)	\$6.62
12/17/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. - Dinner Brent Weisenberg; for attendance at RCBO Disclosure Statement Hearing on December 18, 2024.)	\$51.68
12/18/24	Meals (out of town travel) (VENDOR: Weisenberg, Brent I. Breakfast; Breakfast before attendance at RCBO Disclosure Statement Hearing on December 18, 2024.)	\$7.62
12/19/24	Meals (out of town travel) (VENDOR: Prol, Jeffrey D. - Dinner Jeffrey Prol; Attend disclosure statement hearing in CA)	\$60.00

Professional services

12/13/24	Professional Services (VENDOR: Pagano, Jamie INVOICE#: 7106227412100206 DATE: 12/10/2024 ; 12/13/24; Professional Services; Transcription Services - Rev.com)	\$141.30
----------	---	----------

Computerized legal research

10/18/24	Computerized legal research: Lexis: User: FRANKEL, CHELSEA; Service: SEARCH; Charge Type: ACCESS CHARGE-1; ;	\$105.55
11/11/24	Computerized legal research: Lexis: User: HAYTER, CARRIE; Service: SEARCH; Charge Type: DOC ACCESS-1; ACCESS CHARGE-1; ;	\$113.01
11/18/24	Computerized legal research: Lexis: User: MATTHEWS, NICHOLAS; Service: SEARCH; Charge Type: ACCESS CHARGE-1; DOC ACCESS-1; ;	\$162.05
11/18/24	Computerized legal research: Lexis: User: GAUVIN, CAROLYN; Service: SEARCH; Charge Type: ACCESS CHARGE-1; ;	\$105.55
11/19/24	Computerized legal research: Lexis: User: GAUVIN, CAROLYN; Service: SEARCH; Charge Type: ACCESS CHARGE-1; ;	\$105.55
11/20/24	Computerized legal research: Lexis: User: HAYTER, CARRIE; Service: SEARCH; Charge Type: ACCESS CHARGE-2; ;	\$211.10
07/30/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 07/30/2024 Court: CANBK Pages: 18	\$1.80
08/01/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212377-Q32024 DATE: 10/14/2024 Date: 08/01/2024 Court: MNBK Pages: 44	\$4.40
08/02/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 08/02/2024 Court: CANBK Pages: 95	\$9.50

08/13/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 08/13/2024 Court: CANBK Pages: 40	\$4.00
08/13/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 08/13/2024 Court: CANDC Pages: 20	\$2.00
08/15/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 08/15/2024 Court: CANBK Pages: 33	\$3.30
08/15/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 08/15/2024 Court: 03CA Pages: 11	\$1.10
08/24/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212377-Q32024 DATE: 10/14/2024 Date: 08/24/2024 Court: CACDC Pages: 6	\$0.60
08/24/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212377-Q32024 DATE: 10/14/2024 Date: 08/24/2024 Court: CACBK Pages: 21	\$2.10
08/25/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212377-Q32024 DATE: 10/14/2024 Date: 08/25/2024 Court: CACDC Pages: 7	\$0.70
08/25/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212377-Q32024 DATE: 10/14/2024 Date: 08/25/2024 Court: CACBK Pages: 281	\$28.10
08/28/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212377-Q32024 DATE: 10/14/2024 Date: 08/28/2024 Court: CACDC Pages: 24	\$2.40
08/29/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 08/29/2024 Court: CANBK Pages: 64	\$6.40
08/29/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 08/29/2024 Court: CANDC Pages: 18	\$1.80
09/05/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/05/2024 Court: CANBK Pages: 27	\$2.70
09/05/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32024 DATE: 10/14/2024 Date: 09/05/2024 Court: CANDC Pages: 19	\$1.90
09/20/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212377-Q32024 DATE: 10/14/2024 Date: 09/20/2024 Court: PAMBK Pages: 66	\$6.60
09/21/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212377-Q32024 DATE: 10/14/2024 Date: 09/21/2024 Court: GUBK Pages: 87	\$8.70
09/27/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586594-Q32024 DATE: 10/14/2024 Date: 09/27/2024 Court: CANBK Pages: 39	\$3.90
09/30/24	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212377-Q32024 DATE: 10/14/2024 Date: 09/30/2024 Court: PAMBK Pages: 61	\$6.10
09/02/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 7 / Docs/Lines: 0	\$144.24
09/24/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 4 / Docs/Lines: 0	\$144.24
10/11/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 8 / Docs/Lines: 0	\$432.72
10/13/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 13 / Docs/Lines: 0	\$432.72
10/18/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 6 / Docs/Lines: 0	\$811.60
10/22/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 29 / Docs/Lines: 0	\$144.24

10/22/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 25 / Docs/Lines: 0	\$1,448.91
10/23/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 9 / Docs/Lines: 0	\$231.34
11/10/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 8 / Docs/Lines: 0	\$90.08
11/11/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 75 / Docs/Lines: 0	\$585.50
11/11/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 23 / Docs/Lines: 0	\$896.78
11/12/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 107 / Docs/Lines: 0	\$659.20
11/12/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 2 / Docs/Lines: 0	\$144.24
11/13/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 48 / Docs/Lines: 0	\$257.43
11/13/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 2 / Docs/Lines: 0	\$191.27
11/16/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 28 / Docs/Lines: 0	\$372.59
11/16/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 12 / Docs/Lines: 0	\$144.24
11/17/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 74 / Docs/Lines: 0	\$236.45
11/17/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 7 / Docs/Lines: 0	\$576.95
11/18/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 38 / Docs/Lines: 0	\$747.17
11/18/24	Computerized legal research: Westlaw: User Name: MATTHEWS,NICHOLAS / Duration of Search: 00:00 / Transaction: 18 / Docs/Lines: 0	\$107.13
11/18/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 5 / Docs/Lines: 0	\$459.76
11/19/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 45 / Docs/Lines: 0	\$150.09
11/20/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 25 / Docs/Lines: 0	\$348.02
11/22/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 12 / Docs/Lines: 0	\$47.85
11/25/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 18 / Docs/Lines: 0	\$143.56
11/25/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 7 / Docs/Lines: 0	\$199.34
12/02/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 37 / Docs/Lines: 0	\$95.71
12/04/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 63 / Docs/Lines: 0	\$450.26

12/05/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 30 / Docs/Lines: 0	\$287.12
12/06/24	Computerized legal research: Westlaw: User Name: GAUVIN,CAROLYN / Duration of Search: 00:00 / Transaction: 1 / Docs/Lines: 0	\$150.09
12/09/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 48 / Docs/Lines: 0	\$262.64
12/10/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 13 / Docs/Lines: 0	\$919.52
12/11/24	Computerized legal research: Westlaw: User Name: FRANKEL,CHELSEA / Duration of Search: 00:00 / Transaction: 26 / Docs/Lines: 0	\$569.14

Searches

09/09/24	Searches (VENDOR: Bloomberg Industry Group, Inc. INVOICE#: 6888459842 DATE: 9/9/2024 Bloomberg Docket invoice period 8/1/24-8/31/24)	\$2.99
----------	---	--------

Telecommunications

11/04/24	Other Telecommunications Charges (VENDOR: American Express INVOICE#: 7073680112310321 DATE: 12/31/2024 ; 11/04/24; Hotel - Internet; 11/04/24 RCBO Oakland Diocese Meeting - Wi-Fi charge in connection with conference room reserved for Survivor Statement Conference Hearing meeting with speakers, their counsel and Committee members. Approximately 20 individuals in attendance. Meeting was held to assist Speakers in preparing for the hearing and debriefing thereafter.)	\$610.92
----------	--	----------

Travel

09/11/24	Travel - Accommodations (VENDOR: Weisenberg, Brent I. Hotel - Lodging; (2 nights) for attendance at mediation in Chicago on September 10th and 11th, 2024)	\$1,748.11
09/11/24	Travel - Accommodations (VENDOR: Prol, Jeffrey D. Hotel - Lodging; 2 nights for 9/10 and 9/11 Attend mediation in Chicago)	\$1,773.11
10/14/24	Travel - Accommodations (VENDOR: Weisenberg, Brent I. Hotel (3 nights) for attendance at RCBO Status Conference and hearing on Survivor Statement Motion on October 15th and the RCBO Mediations on October 16 and 17, 2024.)	\$1,369.96
11/03/24	Travel - Accommodations (Hotel - Lodging; RCBO Oakland Diocese Meeting (Kelly O'Lague) - Lowenstein paid this Committee member's two night hotel stay in connection with their attendance at the Survivor Speaker Conference)	\$300.38
11/03/24	Travel - Accommodations (Hotel - Lodging; RCBO Oakland Diocese Meeting (Steve Woodall) - Lowenstein paid this Committee member's two night hotel stay in connection with their attendance at the Survivor Speaker Conference)	\$300.38
11/03/24	Travel - Accommodations (Hotel - Lodging; RCBO Oakland Diocese Meeting (David Sheltraw) - Lowenstein paid this Committee member's two night hotel stay in connection with their attendance at the Survivor Speaker Conference)	\$300.38
11/04/24	Travel - Accommodations (VENDOR: 11/04/24; Hotel - Meeting Room; RCBO Oakland Diocese Meeting - Room rental fee as Committee needed to secure a meeting place for speakers, their counsel and Committee members attending the Survivor Speaker Conference to meet before and after the hearing.)	\$750.00
11/04/24	Travel - Accommodations (Hotel - Other; RCBO Oakland Diocese Meeting - Service fee in connection with conference room Committee secured as a meeting place for speakers, their counsel and Committee members attending the Survivor Speaker Conference to meet before and after the hearing.)	\$1,361.26
11/04/24	Travel - Accommodations (VENDOR: Weisenberg, Brent I. 11/04/24; Hotel - Lodging; Hotel (1 night) for attendance at RCBO Survivor Status Conference on	\$386.40

November 4, 2024.)

11/05/24	Travel - Accommodations (VENDOR: Prol, Jeffrey D. 11/05/24; Hotel - 2 nights Lodging; Attend Oakland Conference in CA)	\$852.50
12/13/24	Travel - Accommodations (VENDOR: Weisenberg, Brent I. Lodging; Hotel (1 night) for attendance at RCBO Survivor Status Conference on December 13, 2024.)	\$186.15
12/17/24	Travel - Accommodations (VENDOR: Weisenberg, Brent I.- Lodging; Hotel (1 night) for attendance at RCBO Disclosure Statement Hearing on December 18, 2024.)	\$198.91
12/18/24	Travel - Accommodations (VENDOR: Prol, Jeffrey D. - Lodging (2 nights); Attend disclosure statement hearing in CA)	\$368.56
09/09/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Air WiFi; Wi-Fi during flight to Chicago for mediation on September 10th and 11th, 2024)	\$8.00
09/09/24	Travel - Airfare (VENDOR: Prol, Jeffrey D. Air WiFi; Attend mediation in Chicago)	\$8.00
09/11/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Airfare; FROM: Newark, NJ (EWR); TO: Chicago, IL - O'Hare (ORD); for attendance at mediation in Chicago on September 10 and 11, 2024)	\$485.27
09/11/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Air WiFi; Wi-Fi during flight back to Newark, NJ from Chicago, IL for mediation on September 10th and 11th, 2024)	\$8.00
09/11/24	Travel - Airfare (VENDOR: Prol, Jeffrey D. Air WiFi; Attend mediation in Chicago)	\$8.00
10/14/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Wi-Fi during flight to San Francisco to attend the RCBO Status Conference and hearing on Survivor Statement Motion on October 15th and the RCBO Mediations on October 16 and 17, 2024.)	\$8.00
10/18/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Plane fare for attendance at RCBO Status Conference and hearing on Survivor Statement Motion on October 15th and the RCBO Mediations on October 16 and 17, 2024.)	\$1,047.10
11/02/24	Travel - Airfare (VENDOR: Prol, Jeffrey D. Air WiFi; Attend Oakland Conference in CA)	\$8.00
11/02/24	Travel - Airfare (VENDOR: Prol, Jeffrey D. Airfare - Coach Class; FROM: Newark, NJ (EWR); TO: San Francisco, CA (SFO); Attend Oakland Conference in CA & CRF Conference in TN)	\$976.79
11/03/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Air WiFi; Wi-Fi during flight to San Francisco to attend RCBO Survivor Status Conference on November 4, 2024.)	\$8.00
11/03/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Airfare - Coach Class; FROM: Newark, NJ (EWR); TO: San Francisco, CA (SFO); Plane fare for attendance at RCBO Survivor Status Conference on November 4, 2024.)	\$735.73
11/05/24	Travel - Airfare (VENDOR: Prol, Jeffrey D. Air WiFi; Attend Oakland Conference in CA)	\$8.00
11/19/24	Travel - Airfare (VENDOR: Prol, Jeffrey D. Airfare; FROM: Houston, TX - Intercontinental (IAH); TO: San Francisco, CA (SFO) to Newark, NJ; Attend disclosure statement hearing in CA)	\$1,149.83
12/04/24	Travel - Airfare (VENDOR: Prol, Jeffrey D. FROM: Newark, NJ (EWR); TO: San Francisco, CA (SFO); Attend hearing in Oakland)	\$666.95
12/12/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Air WiFi; Wi-Fi during flight to San Francisco to attend RCBO Survivor Status Conference on December 13, 2024.)	\$8.00
12/14/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. FROM: Newark, NJ (EWR); TO: San Francisco, CA (SFO); Plane fare for attendance at RCBO Survivor Status Conference on December 13, 2024.)	\$570.38

12/16/24	Travel - Airfare (VENDOR: Prol, Jeffrey D. Air WiFi; Attend hearing in CA)	\$8.00
12/17/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Air WiFi; Wi-Fi during flight to San Francisco to attend RCBO Disclosure Statement Hearing on December 18, 2024.)	\$8.00
12/17/24	Travel - Airfare (VENDOR: Weisenberg, Brent I. Airfare; FROM: Newark, NJ (EWR); TO: San Francisco, CA (SFO); Plane fare for attendance at RCBO Disclosure Statement Hearing on December 18, 2024.)	\$792.50
12/18/24	Travel - Airfare (VENDOR: Prol, Jeffrey D. INVOICE#: 7138019312250203 DATE: 12/25/2024 ; 12/18/24; Airfare; FROM: San Francisco, CA (SFO); TO: Newark, NJ (EWR); Attend hearing in CA - change fee for change of flight home from CA)	\$389.00
09/09/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: airport; TO: hotel; Attend mediation in Chicago)	\$69.74
09/11/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: mediation; TO: airport; Attend mediation in Chicago)	\$124.25
10/14/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Weisenberg, Brent I. Uber from SFO to Hotel for attendance at RCBO Status Conference and hearing on Survivor Statement Motion on October 15th and the RCBO Mediations on October 16 and 17, 2024.)	\$106.95
10/17/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Weisenberg, Brent I. Uber from Foley to SFO after attendance at RCBO Status Conference and hearing on Survivor Statement Motion on October 15th and the RCBO Mediations on October 16 and 17, 2024.)	\$86.19
10/17/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Weisenberg, Brent I. Uber from EWR to Home after attendance at RCBO Status Conference and hearing on Survivor Statement Motion on October 15th and the RCBO Mediations on October 16 and 17, 2024.)	\$61.20
11/02/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: airport; TO: hotel; Attend Oakland Conference in CA)	\$69.12
11/03/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Weisenberg, Brent I. Taxi/Car Service; FROM: SFO Airport, San Francisco, CA; TO: 515 Mason Street, San Francisco, CA; Uber from SFO to Hotel for attendance at RCBO Survivor Status Conference on November 4, 2024.)	\$73.47
11/05/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: hotel; TO: airport; Attend Oakland Conference in CA)	\$57.90
12/12/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Weisenberg, Brent I. Lyft from SFO to Hotel for attendance at RCBO Survivor Status Conference on December 13, 2024.)	\$88.81
12/16/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: airport; TO: hotel; Attend disclosure statement hearing in CA)	\$162.98
12/17/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Weisenberg, Brent I. Uber from SFO to Hotel for attendance at RCBO Disclosure Statement Hearing on December 18, 2024.)	\$139.70
12/18/24	Out of town ground travel (mileage, taxi, tolls etc...) (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: court; TO: SFO following disclosure statement hearing)	\$232.87
09/09/24	Local Travel (VENDOR: Weisenberg, Brent I. Taxi/Car Service; FROM: Livingston, NJ; TO: Newark Airport, Newark, NJ; for attendance at mediation in Chicago on September 10th and 11th, 2024)	\$79.93
09/09/24	Local Travel (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: home; TO: airport; Attend mediation in Chicago)	\$178.40

09/11/24	Local Travel (VENDOR: Weisenberg, Brent I. Uber from EWR to Home after attendance at mediation in Chicago on September 10th and 11th, 2024)	\$47.62
09/11/24	Local Travel (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: airport; TO: home; Attend mediation in Chicago)	\$168.40
10/14/24	Local Travel (VENDOR: Weisenberg, Brent I. 10/14/24; Home to EWR for attendance at RCBO Status Conference and hearing on Survivor Statement Motion on October 15th and the RCBO Mediations on October 16 and 17, 2024)	\$83.52
11/02/24	Local Travel (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: home; TO: airport; Attend Oakland Conference in CA)	\$179.70
11/03/24	Local Travel (VENDOR: Weisenberg, Brent I. Uber from Home to EWR for attendance at RCBO Survivor Status Conference on November 4, 2024.)	\$83.14
11/04/24	Local Travel (VENDOR: Weisenberg, Brent I. Uber from EWR to Home after attendance at RCBO Survivor Status Conference on November 4, 2024.)	\$62.31
11/06/24	Local Travel (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: airport; TO: home; Attend Oakland Conference in CA)	\$179.70
12/12/24	Local Travel (VENDOR: Weisenberg, Brent I. Taxi/Car Service; Uber from Home to EWR for attendance at RCBO Survivor Status Conference on December 13, 2024.)	\$73.90
12/13/24	Local Travel (VENDOR: Weisenberg, Brent I. Lyft from EWR to Home after attendance at RCBO Survivor Status Conference on December 13, 2024.)	\$58.82
12/17/24	Local Travel (VENDOR: Weisenberg, Brent I. Uber from Home to EWR for attendance at RCBO Disclosure Statement Hearing on December 18, 2024.)	\$82.67
12/19/24	Local Travel (VENDOR: Weisenberg, Brent I. Uber from EWR to Home after attendance at RCBO Disclosure Statement Hearing on December 18, 2024.)	\$63.39
12/19/24	Local Travel (VENDOR: Prol, Jeffrey D. Taxi/Car Service; FROM: airport; TO: home; Attend disclosure statement hearing in CA)	\$173.74

Total Disbursements

\$40,849.57

EXHIBIT F**Summary Cover Sheet of Fee Application**

Name of applicant	Lowenstein Sandler LLP
Name of client	Official Committee of Unsecured Creditors
Time period covered by application	09/01/24 to 12/31/24
Total compensation sought this period	\$1,387,687.00
Total expenses sought this period	\$40,849.57
Petition date	May 8, 2023
Retention date	July 8, 2023, effective as of May 30, 2023
Date of order approving employment	July 8, 2023
Total compensation approved by interim order to date	\$4,331,885.91
Total expenses approved by interim order to date	\$154,579.85
Total allowed compensation paid to date	\$4,331,885.91
Total allowed expenses paid to date	\$154,579.85
Blended rate in this application for all attorneys	\$908.32
Blended rate in this application for all timekeepers	\$894.82
Compensation sought in this application already paid pursuant to a monthly compensation order but not yet allowed	\$779,100.00
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed	\$23,150.12
Number of professionals (attorneys) included in this application	13
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 application period	The fees sought in the Application do not exceed the fees budgeted for the time period covered.
Number of professionals (attorneys) billing fewer than 15 hours to the case during this period	4
Are any rates higher than those approved or disclosed at retention? If yes, calculate the amount of compensation attributable to any rate increase	No.

EXHIBIT H

Full Detailed List of Services Rendered by Lowenstein Sandler by Project Category

Code	Date	Timekeeper	Time Narrative	Hours	Amount
<u>B100 - Administration</u>					
<u>B110 Case Administration</u>					
B110	09/16/24	DC	Review docket and update critical dates memo	0.20	\$68.00
B110	09/27/24	DC	Review docket, update critical dates memo and attorney calendar	0.20	\$68.00
B110	10/07/24	DC	Review docket, update critical dates memo and attorney calendar	0.20	\$68.00
B110	10/15/24	DC	Circulate dial in instructions for 10/15/24 hearing and update attorney calendar	0.20	\$68.00
B110	10/16/24	DC	Review docket, download pleadings, update critical dates memo and attorney calendar	0.40	\$136.00
B110	10/28/24	DC	Revise Certificate of Service for Confidentiality Stipulation	0.30	\$102.00
B110	10/29/24	DC	Review docket, update critical dates memo and attorney calendar	0.20	\$68.00
B110	11/05/24	DC	Review revised case management order and update attorney calendar	0.20	\$68.00
B110	11/11/24	DC	Review docket, update critical dates memo and attorney calendar	0.30	\$102.00
B110	11/14/24	DC	Review docket, download and circulate pleadings (.2); and update critical dates memo (.1)	0.30	\$102.00
B110	11/18/24	DC	Review docket, update critical dates memo and attorney calendar	0.10	\$34.00
B110	11/22/24	DC	Review docket, update critical dates memo and attorney calendar	0.40	\$136.00
B110	11/25/24	DC	Review docket in District Court Insurance matter, circulate pleadings and update attorney calendar	0.40	\$136.00
B110	12/02/24	DC	Review dockets in all pending matters, update critical dates memo and attorney calendar	0.60	\$204.00
B110	12/03/24	DC	Review insurer stipulation, update critical dates memo and attorney calendar with all pending deadlines	0.40	\$136.00
B110	12/06/24	DC	Review docket in adversary proceeding and appeals, update fee application status chart	0.30	\$102.00
B110	12/09/24	DC	Review calendar for 12/11/24 hearing, circulate zoom link and update calendar	0.20	\$68.00
B110	12/12/24	DC	Review court calendar and update critical dates memo with zoom links and objection deadlines	0.20	\$68.00
B110	12/17/24	DC	Review docket, download pleadings, update critical dates memo and attorney calendar	0.30	\$102.00
B110	12/30/24	DC	Review and update transcript files	0.20	\$68.00
B110	12/30/24	DC	Review dockets, update critical dates memo and attorney calendar	0.20	\$68.00
Total B110 - Case Administration				5.80	\$1,972.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
<u>B120 Asset Analysis and Recovery</u>					
B120	09/02/24	CF	Finalize alter ego memo	1.20	\$618.00
B120	09/04/24	BIW	Review documents recently produced by Debtor	0.70	\$682.50
B120	09/04/24	JJP	Process new documents into the case database and provide copies of same to B. Weisenberg	0.50	\$182.50
B120	09/05/24	BIW	Review real property insurance documents produced by Debtor	0.70	\$682.50
B120	09/06/24	BIW	Confer with D. Wilson re: real estate valuations	0.60	\$585.00
B120	09/06/24	JDP	Call with D. Wison re: update on real estate valuation	0.60	\$693.00
B120	09/20/24	BIW	Confer with DWC re: real estate analysis	0.30	\$292.50
B120	09/24/24	BIW	Review analysis of real estate values	0.60	\$585.00
B120	09/25/24	BIW	Draft email to BRG Team re: Debtor's MAP process	0.30	\$292.50
B120	09/25/24	BIW	Review documents recently produced by Debtor	0.80	\$780.00
B120	11/01/24	AS	Load incoming production documents into Relativity case database	0.70	\$213.50
Total B120 - Asset Analysis and Recovery				7.00	\$5,607.00
<u>B140 Relief from Stay/Adequate Protection Proceedings</u>					
B140	09/13/24	BIW	Draft email to T. Burns re: prosecution of claims against Schools	0.40	\$390.00
B140	09/15/24	BIW	Review Lift Stay Motion and accompanying pleadings filed in Buffalo diocese case	1.10	\$1,072.50
B140	09/16/24	BIW	Develop lift stay strategy	1.20	\$1,170.00
B140	09/24/24	BIW	Draft emails re: scope of automatic stay	0.30	\$292.50
B140	10/10/24	JDP	Review Buffalo lift stay pleadings	0.50	\$577.50
B140	10/11/24	BIW	Confer with E. Mannix re: scope of automatic stay	0.40	\$390.00
B140	10/11/24	EGM	Conduct research re: automatic stay and extension to non-debtor entities	1.90	\$1,558.00
B140	10/15/24	EGM	Continue research re: confirming no automatic stay in effect as to non-debtor and draft form motion re: same	1.70	\$1,394.00
B140	10/20/24	EGM	Continue drafting motion to confirm that automatic stay does not protect non-debtors from PI lawsuits	2.40	\$1,968.00
B140	10/29/24	EGM	Continue drafting motion for relief from the automatic stay	0.70	\$574.00
B140	11/01/24	BIW	Review caselaw on automatic stay and bellwether trials	0.80	\$780.00
B140	11/02/24	CF	Research re: lift stay motions in other diocese cases	1.60	\$824.00
B140	11/07/24	BIW	Draft lift stay motion	6.70	\$6,532.50
B140	11/08/24	BIW	Continue to draft Lift Stay Motion	2.90	\$2,827.50
B140	11/08/24	BIW	Confer with C. Frankel and C. Gauvin re: guidance on automatic stay research	0.40	\$390.00
B140	11/08/24	CF	Review case law regarding disclosure statement objections and lift stay motions (.9); call with B. Weisenberg and C. Gauvin re: same (.4)	1.30	\$669.50
B140	11/08/24	CG	Perform research analysis and investigation with respect to automatic stay motion (2.4); Call with B. Weisenberg and C. Gauvin re: same (.4)	2.80	\$1,540.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B140	11/09/24	BIW	Continue to draft Lift Stay Motion	0.90	\$877.50
B140	11/09/24	CF	Research re: lift stay motion	1.30	\$669.50
B140	11/09/24	CG	Research re: lift stay	0.80	\$440.00
B140	11/10/24	BIW	Continue to draft Lift Stay Motion	1.90	\$1,852.50
B140	11/10/24	BIW	Confer with M. Kaplan re: Lift Stay litigation strategy	0.80	\$780.00
B140	11/10/24	CG	Search for and analyze ninth circuit case law re: relief from the stay	0.50	\$275.00
B140	11/10/24	MAK	Confer with B. Weisenberg re: Lift Stay litigation strategy	0.80	\$764.00
B140	11/11/24	BIW	Continue to draft Lift Stay	1.10	\$1,072.50
B140	11/11/24	CG	Research 9th circuit case law pertaining to relief from the automatic stay (3.5); incorporate same into automatic stay motion (1.2)	4.70	\$2,585.00
B140	11/11/24	CG	Participate in conference with California local counsel, G. Albert, with respect to ninth circuit case law to assist in stay lift motion	0.50	\$275.00
B140	11/12/24	BIW	Revise Lift Stay Motion	1.60	\$1,560.00
B140	11/13/24	BIW	Revise Lift Stay Motion	1.20	\$1,170.00
B140	11/14/24	BIW	Revise Lift Stay Motion	0.80	\$780.00
B140	11/14/24	CG	Review and incorporate changes made by G. Albert to the stay lift motion	3.60	\$1,980.00
B140	11/14/24	JDP	Review and edit draft motion to lift stay	1.70	\$1,963.50
B140	11/15/24	BIW	Revise Lift Stay Motion	1.20	\$1,170.00
B140	11/15/24	BIW	Review pleadings filed in other cases re: lift stay motion and objections	0.80	\$780.00
B140	11/15/24	JDP	Continued review and edits to draft motion to lift stay	4.60	\$5,313.00
B140	11/16/24	BIW	Revise Lift Stay Motion	1.40	\$1,365.00
B140	11/16/24	BIW	Review comments from other professionals and revise Lift Stay Motion to incorporate same	1.30	\$1,267.50
B140	11/16/24	JDP	Review and edit motion to lift stay	2.80	\$3,234.00
B140	11/17/24	BIW	Revise Lift Stay Motion	1.80	\$1,755.00
B140	11/17/24	CG	Blue Book and review all case law cited in lift stay motion to finalize the document	7.30	\$4,015.00
B140	11/18/24	CG	Correspond with B. Weisenberg on lift stay citation and case law issues	0.50	\$275.00
B140	11/18/24	JDP	Review and edit motion to lift stay	2.50	\$2,887.50
B140	11/19/24	BIW	Confer with T. Burns and J. Bair re: Lift Stay Motion strategy	0.50	\$487.50
B140	11/19/24	BIW	Revise Lift Stay Motion to include comments from SCC (1.0); confer with J. Prol re: same (.2)	1.20	\$1,170.00
B140	11/19/24	CG	Proofread, citation check, and blue book lift stay motion	4.60	\$2,530.00
B140	11/19/24	JDP	Review comments from SCC on lift stay motion (.5); confer with B. Weisenberg re: same (.2)	0.70	\$808.50
B140	11/19/24	JDP	Confer with insurance counsel re: lift stay motion	0.50	\$577.50
B140	11/20/24	BIW	Revise Lift Stay Motion to include comments from others	1.70	\$1,657.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B140	11/20/24	CG	Review and edit standing motion	0.30	\$165.00
B140	11/20/24	CG	Finalize lift stay motion	1.00	\$550.00
B140	11/20/24	JDP	Review and edit lift stay motion	2.10	\$2,425.50
B140	11/26/24	JDP	Review and edit stay relief motion	2.30	\$2,656.50
B140	12/10/24	JDP	Review insurers' brief in support of stay relief to allow insurance declaratory relief action to proceed in state court in the Archdiocese of San Francisco case and develop strategy for reply to committee's motion for stay relief	0.80	\$924.00
B140	12/23/24	CMR	Analyze issues and pleadings re: Motion to Lift Stay (1.6); Call with B. Weisenberg re: same (.2)	1.80	\$1,611.00
B140	12/24/24	BIW	Begin outlining Response to Lift Stay Objections	1.40	\$1,365.00
B140	12/24/24	JDP	Review lift stay pleadings in other diocese cases to prepare for lift stay reply and hearing	0.40	\$462.00
B140	12/25/24	BIW	Continue preparing for Lift Stay hearing	1.40	\$1,365.00
B140	12/26/24	BIW	Confer with T. Burns to prepare for Stay Hearing (.6); confer with counsel for Committee member re: same (.4)	1.00	\$975.00
B140	12/26/24	CMR	Analyze issues re: Motion to Lift Stay	1.10	\$984.50
B140	12/26/24	JDP	Review Pfau Cochran joinder to lift stay motion (.2); review and respond to e-mails re: filing same (.2)	0.40	\$462.00
B140	12/27/24	CMR	Analyze issues re: Motion to Lift Stay	2.00	\$1,790.00
B140	12/29/24	BIW	Begin drafting outline for Lift Stay Motion	0.40	\$390.00
B140	12/30/24	BIW	Continue drafting outline for Lift Stay Motion	0.40	\$390.00
B140	12/30/24	CMR	Analyze issues re: Motion to Lift Stay in preparation for response to Objections	3.20	\$2,864.00
B140	12/31/24	BIW	Review objections to Lift Stay Motion	0.80	\$780.00
B140	12/31/24	CMR	Review objections to Motion to Lift Stay (2.0); Prepare Reply in Support of Lift Stay Motion (2.1); Call with LS Team re: same (.6)	4.70	\$4,206.50
B140	12/31/24	EJS	Review and analyze Lift Stay Motion Objections (2.8); call (.6) and email correspondence (.2) with B. Weisenberg and C. Restel re same; draft reply outline (1.7)	5.30	\$3,789.50
Total B140 - Relief from Stay/Adequate Protection Proceedings				113.50	\$97,443.00
<u>B150 Meetings of and Communication with Creditors</u>					
B150	09/02/24	BIW	Prepare for Committee presentation re: Mediation strategy	1.10	\$1,072.50
B150	09/02/24	EGM	Further revise Committee presentation deck re: mediation strategy	0.40	\$328.00
B150	09/03/24	BIW	Confer with BRG to prepare for Committee Mediation Presentation	0.50	\$487.50
B150	09/03/24	BIW	Participate in call with Committee re: mediation preparation	1.50	\$1,462.50
B150	09/03/24	BIW	Prepare for Committee conference call	0.60	\$585.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	09/03/24	EGM	Participate in call with J. Prol, B. Weisenberg, M. Babcock, P. Shields, and R. Strong to prepare for Committee call re: mediation strategy (.5); participate in Committee call re: same (1.5)	2.00	\$1,640.00
B150	09/03/24	JDP	Review notes and deck to prepare for call with committee (1.2); confer with B,. Weisenberg to prepare for committee call (.3); call with BRG to prepare for committee call on mediation presentation (.5)	2.00	\$2,310.00
B150	09/03/24	JDP	Participate in committee call re: mediation strategy	1.50	\$1,732.50
B150	09/05/24	BIW	Confer with counsel for Committee member re: mediation preparation and strategy	0.40	\$390.00
B150	09/06/24	BIW	Confer with Committee re: mediation preparation	1.00	\$975.00
B150	09/06/24	JDP	Prepare for (.4) and participate in (1.) committee call to prepare for mediation	1.40	\$1,617.00
B150	09/09/24	BIW	Confer with counsel for Committee member re: preparation for following day's mediation (1@.3 and 1@.4)	0.70	\$682.50
B150	09/10/24	BIW	Draft detailed email to Committee re: update on mediation	0.70	\$682.50
B150	09/10/24	BIW	Confer with counsel for Committee member re: update on mediation	0.40	\$390.00
B150	09/11/24	BIW	Draft email to Committee re: update on mediation session	0.30	\$292.50
B150	09/12/24	BIW	Confer with J. Prol to prepare for call with State Court Counsel to debrief on mediation sessions	0.80	\$780.00
B150	09/12/24	BIW	Confer with T. Burns re: prepare for call with State Court Counsel to debrief on mediation sessions	0.80	\$780.00
B150	09/12/24	BIW	Participate in call with State Court Counsel re: debrief on mediation sessions	1.50	\$1,462.50
B150	09/12/24	BIW	Draft email to counsel to Committee re: Term Sheet and recap earlier day's call	0.40	\$390.00
B150	09/12/24	BIW	Confer with counsel for Committee member re: mediation strategy	0.30	\$292.50
B150	09/12/24	JDP	Confer with B. Weisenberg re: strategy for SCC meeting	0.80	\$924.00
B150	09/12/24	JDP	Prepare for (.8) and participate in (1.5) call with SCC re: mediation status and strategy	2.30	\$2,656.50
B150	09/13/24	BIW	Confer with Committee member re: mediation update	0.30	\$292.50
B150	09/13/24	BIW	Confer with counsel for Committee member to prepare for mediation	0.60	\$585.00
B150	09/13/24	BIW	Participate in call with Committee re: mediation update	1.60	\$1,560.00
B150	09/13/24	JDP	Prepare for (.5) and participate in committee meeting (1.6) to discuss Bishop's settlement offer and potential responses	2.10	\$2,425.50
B150	09/17/24	BIW	Participate in weekly call with Committee re: proposed response to Debtor's settlement offer	1.50	\$1,462.50
B150	09/17/24	BIW	Draft email to Committee re: suggested response to Debtor's settlement proposal	0.40	\$390.00
B150	09/17/24	BIW	Confer with counsel for Committee member re: mediation strategy	0.60	\$585.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	09/17/24	EGM	Participate in weekly Committee call (1.5); review proposed email to mediator from B. Weisenberg (.3)	1.80	\$1,476.00
B150	09/19/24	BIW	Confer with Committee member re: mediation strategy	0.80	\$780.00
B150	09/20/24	BIW	Draft email to counsel for Committee member re: response to inquiry on POC Supplements	0.20	\$195.00
B150	09/20/24	BIW	Participate in call with Committee re: mediation strategy	1.60	\$1,560.00
B150	09/20/24	BIW	Confer with Committee member to address questions on mediation process	0.60	\$585.00
B150	09/20/24	BIW	Confer with counsel for Committee member re: mediation strategy	0.80	\$780.00
B150	09/23/24	BIW	Confer with counsel to Committee member re: mediation strategy	0.50	\$487.50
B150	09/25/24	BIW	Draft email to counsel for Committee members re: update in lieu of call	0.30	\$292.50
B150	09/26/24	BIW	Confer with T. Burns re: prepare for call with counsel for Committee members	0.40	\$390.00
B150	09/26/24	BIW	Participate in call with counsel for Committee members re: mediation strategy	1.40	\$1,365.00
B150	09/26/24	BIW	Confer with counsel for Committee member re: mediation strategy	0.60	\$585.00
B150	09/26/24	JDP	Prepare for (.3) and participate in (1.4) SCC update call	1.70	\$1,963.50
B150	09/27/24	BIW	Participate in call with Committee re: mediation update	1.10	\$1,072.50
B150	09/27/24	JDP	Participate in committee update call	1.10	\$1,270.50
B150	09/29/24	BIW	Draft email to State Court Counsel re: scheduling of future calls	0.10	\$97.50
B150	09/29/24	BIW	Draft email to Committee members re: scheduling of Survivor Status Conferences	0.10	\$97.50
B150	09/30/24	BIW	Confer with counsel for Committee member re: strategy for upcoming mediation sessions	0.30	\$292.50
B150	09/30/24	BIW	Confer with counsel for Committee member re: mediation strategy in advance of mediation sessions	0.40	\$390.00
B150	10/01/24	BIW	Confer with survivor re: status of case	0.60	\$585.00
B150	10/01/24	BIW	Draft email to Committee re: update on mediation sessions	0.50	\$487.50
B150	10/01/24	BIW	Draft email to Committee members re: insurance recovery strategy	0.20	\$195.00
B150	10/01/24	BIW	Confer with counsel for Committee member re: claims existing against Schools	0.30	\$292.50
B150	10/04/24	BIW	Draft email to counsel for Committee members re: attendance at upcoming mediation session	0.20	\$195.00
B150	10/04/24	BIW	Draft email to Committee re: scheduling of Status Conferences	0.30	\$292.50
B150	10/06/24	BIW	Draft emails to Committee members re: scheduling of Survivor Conferences	0.30	\$292.50
B150	10/08/24	BIW	Draft email to Committee re: participation in Survivor Conferences	0.30	\$292.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	10/08/24	BIW	Confer with counsel for Committee member re: mediation preparation	0.70	\$682.50
B150	10/08/24	BIW	Confer with counsel for Committee member re: mediation preparation	0.60	\$585.00
B150	10/09/24	BIW	Draft email to State Court Counsel re: agenda for next day's meeting	0.20	\$195.00
B150	10/10/24	BIW	Participate in weekly call with counsel for Committee members	1.10	\$1,072.50
B150	10/10/24	BIW	Confer with counsel for Committee member re: mediation strategy	0.70	\$682.50
B150	10/10/24	JDP	Participate in weekly call with counsel for Committee members	1.10	\$1,270.50
B150	10/11/24	BIW	Confer with counsel for Committee member re: mediation strategy	0.70	\$682.50
B150	10/11/24	BIW	Participate in call with Committee re: mediation preparation and strategy	0.80	\$780.00
B150	10/11/24	JDP	Prepare for (.4) and participate in (.8) committee update call	1.20	\$1,386.00
B150	10/15/24	BIW	Draft email to Committee to recap day's hearing on Survivor Statement Motion	0.40	\$390.00
B150	10/15/24	BIW	Confer with counsel for Survivor re: update on status of case	0.30	\$292.50
B150	10/17/24	BIW	Participate in conference call with counsel for Committee members re: prospective Insurer settlement scenarios	1.30	\$1,267.50
B150	10/17/24	JDP	Prepare for (.3) and participate in (1.3) call with SCC re: insurance mediation proposal	1.60	\$1,848.00
B150	10/18/24	BIW	Participate in with Committee update call re: settlement scenarios	1.10	\$1,072.50
B150	10/18/24	BIW	Confer with Committee member re: update on mediations	0.60	\$585.00
B150	10/18/24	BIW	Confer with Committee member re: update on Insurer mediation	0.30	\$292.50
B150	10/18/24	JDP	Participate in conference call with Committee members re: prospective settlement scenarios	1.10	\$1,270.50
B150	10/22/24	BIW	Draft email to Committee re: update on Survivor Status Conference pleadings	0.50	\$487.50
B150	10/24/24	BIW	Draft email to Committee re: update on Survivor Statement hearing	0.30	\$292.50
B150	10/24/24	BIW	Draft email to counsel for Committee members re: setting Survivor Statement Conference dates	0.20	\$195.00
B150	10/24/24	BIW	Confer with Committee member re: further update on Survivor Statement hearing	0.30	\$292.50
B150	10/25/24	BIW	Confer with Survivor re: logistics for November 4th Survivor Conferences	0.40	\$390.00
B150	10/28/24	BIW	Draft email to counsel for Committee member re: response to inquiry on settlement offer	0.30	\$292.50
B150	10/28/24	BIW	Draft email to counsel for Committee re: status of mediation and preparation for 11/5 and 11/6 sessions	0.40	\$390.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	10/28/24	JDP	Participate in call with SCC to prepare for mediation	1.00	\$1,155.00
B150	10/28/24	JDP	Prepare for SCC call	0.50	\$577.50
B150	10/28/24	JDP	Participate in call with survivor and SCC re: logistics for survivor statements	1.30	\$1,501.50
B150	10/29/24	BIW	Confer with counsel for Committee members re: Diocese settlement offer	1.20	\$1,170.00
B150	10/29/24	BIW	Confer with counsel for Committee members re: Diocese settlement offer	0.40	\$390.00
B150	10/29/24	BIW	Draft email to Committee re: preparation for Survivor Statement Conferences	0.40	\$390.00
B150	10/29/24	BIW	Confer with counsel for Committee member re: possible response to recent Diocese offer	0.60	\$585.00
B150	10/29/24	JDP	Prepare (.5) for and participate in (1.2) call with SCC re: Bishop's settlement offer	1.70	\$1,963.50
B150	10/30/24	BIW	Confer with counsel for Committee members re: recent Diocese offer	0.40	\$390.00
B150	10/31/24	BIW	Participate in call with counsel for Committee members and Mediator	1.90	\$1,852.50
B150	10/31/24	BIW	Draft email to counsel for Committee members re: analysis of Diocese offer	0.40	\$390.00
B150	10/31/24	BIW	Draft email to Committee re: agenda for following day's call	0.20	\$195.00
B150	10/31/24	JDP	Attend portion of SCC call with Judge Sontchi	0.50	\$577.50
B150	11/01/24	BIW	Call with Committee re: Debtor's settlement proposal	1.40	\$1,365.00
B150	11/01/24	BIW	Draft email to counsel for Committee Members re: cancellation of mediation sessions	0.40	\$390.00
B150	11/01/24	BIW	Call with counsel for Committee members re: debrief on conference call with Committee	0.60	\$585.00
B150	11/01/24	BIW	Confer with counsel for Committee member re: recent Diocese offer	0.60	\$585.00
B150	11/01/24	JDP	Participate in committee update call re: mediation and survivor statement hearing	1.40	\$1,617.00
B150	11/02/24	BIW	Draft email to Committee re: mediation cancellation	0.40	\$390.00
B150	11/02/24	BIW	Draft email to counsel for Committee members re: description of Debtor's settlement offer	0.80	\$780.00
B150	11/04/24	BIW	Prepare for Survivor Statement Conferences by meeting with Survivors prior to Conference	5.10	\$4,972.50
B150	11/04/24	BIW	Meet with Survivors after Survivor Statement Conferences	2.20	\$2,145.00
B150	11/04/24	JDP	Meeting with survivors to prepare for survivor statement hearing	5.10	\$5,890.50
B150	11/04/24	JDP	Debrief with survivors following survivor statement hearing	2.20	\$2,541.00
B150	11/05/24	BIW	Confer with counsel for Committee member re: debriefing on Survivor Status Conferences	0.40	\$390.00
B150	11/06/24	BIW	Call with counsel for Committee members re: possibility of Debtor filing Plan and Committee's response	0.60	\$585.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	11/06/24	BIW	Confer with counsel for Committee member re: possibility of Debtor filing Plan and Committee's response	0.40	\$390.00
B150	11/06/24	JDP	Call with SCC re: pause in mediation and next steps	0.60	\$693.00
B150	11/07/24	BIW	Participate in standing call with counsel for Committee members	0.90	\$877.50
B150	11/07/24	JDP	Prepare for (.6) and participate in (.9) SCC update call re: litigation strategy	1.50	\$1,732.50
B150	11/08/24	BIW	Draft email to Committee re: feedback on Survivor Conferences	0.20	\$195.00
B150	11/08/24	BIW	Participate in standing call with Committee	1.10	\$1,072.50
B150	11/08/24	JDP	Prepare for (.2) and participate in (1.1) Committee update call re: survivor statement hearing and strategy going forward	1.30	\$1,501.50
B150	11/09/24	BIW	Draft email to Committee re: Plan and Disclosure Statement	0.70	\$682.50
B150	11/09/24	BIW	Draft email to counsel for Committee member re: filed plan and Disclosure Statement	0.20	\$195.00
B150	11/14/24	BIW	Confer with Survivor re: update on case	0.60	\$585.00
B150	11/14/24	BIW	Draft emails to Survivors responding to inquiries re: Plan and Disclosure Statement (2 at .2 each)	0.40	\$390.00
B150	11/15/24	BIW	Confer with Survivor re: update on case	0.30	\$292.50
B150	11/15/24	BIW	Draft email to counsel for Committee members re: update on impending filings	0.40	\$390.00
B150	11/15/24	JDP	Review and edit e-mail update to SCC re: filing of disclosure statement and response	0.20	\$231.00
B150	11/19/24	BIW	Draft email to counsel for Committee member re: lift stay motion	0.60	\$585.00
B150	11/19/24	BIW	Confer with counsel for Committee member re: litigation strategy	0.40	\$390.00
B150	11/19/24	JDP	Review and respond to comments from SCC on lift stay motion	0.90	\$1,039.50
B150	11/20/24	BIW	Draft email to counsel for Committee members re: report on as-filed complaints	0.30	\$292.50
B150	11/20/24	BIW	Draft email to Committee to summarize recent motions and complaint filed by Committee	0.40	\$390.00
B150	11/20/24	BIW	Draft email to counsel for Committee re: update on recent filings	0.90	\$877.50
B150	11/21/24	BIW	Draft email to Committee re: filed pleadings and summarize same	0.40	\$390.00
B150	11/21/24	BIW	Participate in conference call with counsel for Committee members re: recent filings	0.60	\$585.00
B150	11/22/24	BIW	Participate in conference call with Committee members to discuss recent filings	1.10	\$1,072.50
B150	11/22/24	BIW	Confer with counsel for Committee Member re: litigation strategy	0.40	\$390.00
B150	11/22/24	BIW	Draft email to Committee to summarize causes of action	0.40	\$390.00
B150	11/22/24	BIW	Confer with Committee Member re: litigation strategy	0.60	\$585.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	11/22/24	JDP	Prepare for (.3) and participate in (1.1) in Committee update call	1.40	\$1,617.00
B150	11/22/24	NF	Call with J. Prol re: prep for committee call (.1); prepare for (.5) and attend committee call (1.1)	1.70	\$1,768.00
B150	11/25/24	BIW	Draft responsive email to Committee member re: Survivor Status Conference	0.30	\$292.50
B150	11/25/24	BIW	Draft responsive email to Survivor re: follow-up to Survivor Status Conference	0.20	\$195.00
B150	11/25/24	BIW	Confer with Survivor re: questions about Survivor Statement Conference	0.40	\$390.00
B150	11/26/24	BIW	Draft email to Committee re: Debtor's motion to adjourn hearing on Committee motions	0.40	\$390.00
B150	11/26/24	BIW	Confer with M. Finnegan re: Committee's Lift Stay Motion	0.40	\$390.00
B150	11/26/24	BIW	Confer with Survivor re: questions about Survivor Statement Conference	0.30	\$292.50
B150	11/26/24	BIW	Draft responsive email to Survivor re: follow-up to Survivor Status Conference	0.20	\$195.00
B150	11/27/24	BIW	Confer with Survivor re: questions about Survivor Statement Conference	0.40	\$390.00
B150	11/27/24	BIW	Draft email to Committee re: report on Debtor's Adjournment Motion	0.40	\$390.00
B150	11/27/24	BIW	Draft responsive email to counsel for Committee member re: Lift Stay Motion issues	0.30	\$292.50
B150	12/04/24	BIW	Draft email to counsel for Committee in lieu of weekly call re: status update	0.30	\$292.50
B150	12/05/24	BIW	Draft email to Committee in lieu of weekly call re: status update	0.30	\$292.50
B150	12/06/24	BIW	Participate in conference call with Committee members re: update on pleadings to be filed	0.60	\$585.00
B150	12/06/24	JDP	Participate in committee update call	0.60	\$693.00
B150	12/11/24	BIW	Revise email to Committee re: retention of Unknown Abuse Claims Representative	0.30	\$292.50
B150	12/15/24	BIW	Draft email to Committee re: debrief on Survivor Status Conferences	0.40	\$390.00
B150	12/17/24	BIW	Draft email to Committee re: Disclosure Statement Replies and filed Standing Motion	0.40	\$390.00
B150	12/17/24	BIW	Draft email to counsel for Survivor re: inquiry on additional Survivor Speaker Conferences	0.30	\$292.50
B150	12/18/24	BIW	Draft email to Committee re: Disclosure Statement hearing	0.40	\$390.00
B150	12/19/24	BIW	Confer with counsel for Committee members re: debrief after Disclosure Statement hearing	0.80	\$780.00
B150	12/20/24	BIW	Confer with Committee members re: debrief after Disclosure Statement hearing	1.20	\$1,170.00
B150	12/20/24	JDP	Prepare for (.3) and participate in (1.2) committee update call	1.40	\$1,617.00
B150	12/23/24	BIW	Confer with counsel for Committee member re: preparation for Standing Motion	0.40	\$390.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	12/23/24	BIW	Draft responsive email to Survivor re: inquiry on upcoming hearing dates	0.20	\$195.00
B150	12/23/24	BIW	Confer with counsel for Committee member re: upcoming lift stay motion hearing	0.20	\$195.00
B150	12/23/24	BIW	Confer with counsel for Committee members re: expected motion to compel mediation	0.70	\$682.50
B150	12/23/24	BIW	Confer with R. Simons re: Lift Stay Motion hearing	0.40	\$390.00
B150	12/26/24	BIW	Confer with counsel for Committee member re: mediation issues	0.70	\$682.50
Total B150 - Meetings of and Communication with Creditors				124.70	\$128,152.00
<u>B155 Mediation</u>					
B155	09/02/24	BIW	Confer with T. Burns re: insurance mediation strategy	0.70	\$682.50
B155	09/03/24	BIW	Confer with T. Burns re: Insurer mediation strategy	0.40	\$390.00
B155	09/03/24	BIW	Prepare Mediator Deck	0.70	\$682.50
B155	09/04/24	BIW	Continue drafting Mediator Presentation	2.60	\$2,535.00
B155	09/04/24	JDP	Prepare for mediation	1.10	\$1,270.50
B155	09/05/24	BIW	Confer with BRG re: revisions needed to presentation to Mediator (.4); revise same (.5)	0.90	\$877.50
B155	09/05/24	JDP	Continue to develop mediation strategy	1.50	\$1,732.50
B155	09/06/24	BIW	Review Debtor's analysis of comparable bankruptcy settlements	0.80	\$780.00
B155	09/06/24	BIW	Draft presentation re: comparable settlements in non-profit religious bankruptcies	1.60	\$1,560.00
B155	09/06/24	BIW	Confer with T. Burns re: mediation preparation	0.30	\$292.50
B155	09/06/24	BIW	Confer with Mediator re: preparation for following week's mediation	0.40	\$390.00
B155	09/06/24	BIW	Revise presentation to Mediator re: data supporting settlement demand	0.70	\$682.50
B155	09/06/24	BIW	Further revise presentation to Debtor re: support for settlement demand	0.40	\$390.00
B155	09/06/24	JDP	Call with Judge Sontchi to prepare for mediation	0.40	\$462.00
B155	09/06/24	JDP	Review and edit deck for mediator presentation	0.80	\$924.00
B155	09/06/24	JDP	Review analysis of Debtor's data on settlement values (.4); call with call with Stout re: same (.4)	0.80	\$924.00
B155	09/06/24	JDP	Review analysis of prior diocese bankruptcy settlements	0.70	\$808.50
B155	09/07/24	BIW	Revise (I) presentation re: comparable settlements in non-profit religious bankruptcies and (ii) facts supporting settlement proposal	1.30	\$1,267.50
B155	09/08/24	BIW	Confer with K. McNally re: revisions to presentations to mediator	0.40	\$390.00
B155	09/08/24	BIW	Revise (I) presentation re: comparable settlements in non-profit religious bankruptcies and (ii) facts supporting settlement proposal	1.60	\$1,560.00
B155	09/09/24	BIW	Revise presentation re: comparable settlements in non-profit religious bankruptcies (1.9) and facts supporting settlement proposal (1.8)	3.70	\$3,607.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	09/09/24	BIW	Confer with BRG re: Mediator Presentation	0.70	\$682.50
B155	09/09/24	BIW	Confer with Judge Sontchi re: mediation preparation	0.40	\$390.00
B155	09/09/24	BIW	Revise presentation re: comparable settlements in non-profit religious bankruptcies	1.10	\$1,072.50
B155	09/09/24	BIW	Prepare for Mediation in Chicago by reviewing analyses, memos and Debtor's document productions	2.30	\$2,242.50
B155	09/09/24	BIW	Confer with J. Prol to prepare for following day's mediation	0.80	\$780.00
B155	09/09/24	JDP	Prepare for mediation and presentation to Debtor (1.3); confer with B. Weisenberg re: same (.8)	2.10	\$2,425.50
B155	09/09/24	JDP	Review and edit deck for presentation to Debtor	1.20	\$1,386.00
B155	09/09/24	JDP	Review and comment on draft response to Bishop's analysis of prior diocesan settlements	1.20	\$1,386.00
B155	09/10/24	BIW	Attend Mediation session in Chicago (7.0); follow-up with J. Prol re: same (.5)	7.50	\$7,312.50
B155	09/10/24	BIW	Meet with T. Burns and J. Bair re: settlement strategy with Insurers	1.10	\$1,072.50
B155	09/10/24	JDP	Prepare for (1.5); and attend mediation with Debtor (7.); download with B. Weisenberg (.5)	9.00	\$10,395.00
B155	09/11/24	BIW	Attend Mediation session in Chicago	6.50	\$6,337.50
B155	09/11/24	JDP	Attend mediation	6.50	\$7,507.50
B155	09/11/24	JDP	Analyze offer and term sheet from Debtor (.9); develop strategy (.9)	1.80	\$2,079.00
B155	09/12/24	BIW	Confer with Mediator re: debrief on mediation sessions	0.40	\$390.00
B155	09/12/24	BIW	Confer with Stout re: update on mediation	0.40	\$390.00
B155	09/13/24	BIW	Confer with Mediator re: analysis of Debtor's offer	0.60	\$585.00
B155	09/13/24	CF	Call with B. Weisenberg re: preparing request for status conference	0.20	\$103.00
B155	09/13/24	EGM	Call with B. Weisenberg to discuss outcome of mediation and strategy for next steps	0.40	\$328.00
B155	09/13/24	JDP	Confer with B. Weisenberg re: mediation position	0.40	\$462.00
B155	09/13/24	JDP	Revise mediation strategy	1.20	\$1,386.00
B155	09/16/24	BIW	Draft lengthy email to Mediator re: outline response to offer	0.80	\$780.00
B155	09/16/24	BIW	Confer with G. Albert re: scheduling and coordination of Survivor hearings	0.40	\$390.00
B155	09/16/24	JDP	Review and edit draft email to mediator responding to Debtor's offer	0.30	\$346.50
B155	09/16/24	JDP	Confer with B. Weisenberg re: mediation strategy	0.40	\$462.00
B155	09/17/24	BIW	Confer with Mediator re: counter-offer parameters	0.40	\$390.00
B155	09/17/24	BIW	Confer with T. Burns re: status of mediation and strategy going forward	0.40	\$390.00
B155	09/18/24	BIW	Confer with T. Burns re: Insurance mediation strategy	0.40	\$390.00
B155	09/19/24	BIW	Review analyses of claim valuations to assist in mediation negotiations	0.60	\$585.00
B155	09/19/24	CF	Prepare application requesting status conference for survivor statements	0.70	\$360.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	09/20/24	BIW	Confer with Mediator to explain proposed counteroffer	0.40	\$390.00
B155	09/20/24	BIW	Confer with Mediator to relay counteroffer	0.50	\$487.50
B155	09/20/24	BIW	Revise email to Mediator re: Committee's settlement proposal	0.60	\$585.00
B155	09/20/24	CF	Prepare application requesting status conference for survivor statements	6.10	\$3,141.50
B155	09/23/24	BIW	Confer with Mediator to discuss Committee's counteroffer	0.40	\$390.00
B155	09/23/24	BIW	Review and revise Application to Allow Survivor Statements	1.10	\$1,072.50
B155	09/23/24	JDP	Prepare for mediation	0.70	\$808.50
B155	09/24/24	BIW	Confer with Mediator to address questions about future mediation sessions	0.30	\$292.50
B155	09/24/24	BIW	Further revise Survivor Statement Motion and proposed Order	0.70	\$682.50
B155	09/24/24	BIW	Confer with T. Burns re: status of mediation	0.30	\$292.50
B155	09/24/24	BIW	Confer with G. Albert re: Survivor Statement hearing logistics and guardrails	0.30	\$292.50
B155	09/24/24	BIW	Confer with C. Frankel re: research needed to facilitate overcoming mediation roadblocks	0.50	\$487.50
B155	09/24/24	BIW	Revise Mediator's summary of state of play	0.30	\$292.50
B155	09/24/24	BIW	Draft email to M. Babcock re: mediation preparation	0.20	\$195.00
B155	09/24/24	CF	Call with B. Weisenberg re: claims valuation and survivors conference application	0.40	\$206.00
B155	09/24/24	JDP	Develop mediation strategy (.5); confer with B. Weisenberg re: same (.2)	0.70	\$808.50
B155	09/24/24	JDP	Review and comment on Judge Sontchi's summary of status of mediation	0.20	\$231.00
B155	09/25/24	BIW	Further revise Survivor Statement Motion and proposed Order	0.40	\$390.00
B155	09/25/24	BIW	Confer with C. Frankel and J. Prol re: research needed to facilitate mediation	0.70	\$682.50
B155	09/25/24	BIW	Draft email to J. Prol re: comments on research needed to facilitate mediation	0.30	\$292.50
B155	09/25/24	BIW	Review and comment on research to facilitate mediation	0.80	\$780.00
B155	09/25/24	CF	Revise survivor status conference application	1.50	\$772.50
B155	09/25/24	CF	Call with J. Prol and B. Weisenberg re: various research tasks	0.70	\$360.50
B155	09/25/24	JDP	Call with B. Weisenberg and C. Frankel re: mediation issues	0.70	\$808.50
B155	09/26/24	BIW	Review and comment on research needed to facilitate mediation progress	1.20	\$1,170.00
B155	09/26/24	CF	Revise survivor conference application materials	1.10	\$566.50
B155	09/27/24	BIW	Confer with Mediator to prepare for Monday's mediation	0.80	\$780.00
B155	09/27/24	BIW	Reviewed research on relationship between Diocese and its affiliated entities	0.80	\$780.00
B155	09/27/24	CF	Revise survivor conference application	1.70	\$875.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	09/27/24	JDP	Call with Judge Sontchi to prepare for mediation	0.80	\$924.00
B155	09/28/24	BIW	Finalize draft of Survivor Statement Application (.4); draft email to Mediator re: same (.3); draft email to Committee re: same (.3)	1.00	\$975.00
B155	09/28/24	JDP	Review and edit motion and proposed form of order scheduling status conference to permit survivor statements	1.40	\$1,617.00
B155	09/29/24	BIW	Draft several emails to T. Burns re: Insurer mediation issues	0.30	\$292.50
B155	09/29/24	BIW	Draft email re: RCBO/ school directors and disbursement of funds on liquidation	0.20	\$195.00
B155	09/29/24	BIW	Draft emails re: Schools attendance at mediation sessions	0.20	\$195.00
B155	09/30/24	BIW	Attend virtual mediation session	3.10	\$3,022.50
B155	09/30/24	BIW	Review revisions to Survivor Statement Motion and comment on same	0.60	\$585.00
B155	09/30/24	CF	Review and revise survivor conferences motion	1.10	\$566.50
B155	09/30/24	CF	Email communications re: motion for survivor conferences	0.20	\$103.00
B155	09/30/24	JDP	Prepare for (.4) and participate in (3.1) mediation	3.50	\$4,042.50
B155	10/01/24	BIW	Review Debtor's proposed revisions to Survivor Statement Motion and comment on same	0.40	\$390.00
B155	10/01/24	BIW	Attend virtual mediation session	1.90	\$1,852.50
B155	10/01/24	BIW	Devise Plan structure strategies	0.70	\$682.50
B155	10/01/24	JDP	Review Debtor suggested edits to Order scheduling status conference for Survivor statements (.2); confer with B. Weisenberg re: same (.1)	0.30	\$346.50
B155	10/01/24	JDP	Prepare for mediation (.4); confer with B. Weisenberg re: same (.3); participate in portion of mediation (.7)	1.40	\$1,617.00
B155	10/01/24	JDP	Develop strategy for meeting with Welfare Corp	0.40	\$462.00
B155	10/02/24	BIW	Review DWC draft of portion of real estate value analysis	0.60	\$585.00
B155	10/02/24	BIW	Draft settlement presentation to Welfare Corp. and email describing same	1.60	\$1,560.00
B155	10/02/24	BIW	Review analysis of Schools' assets	0.80	\$780.00
B155	10/02/24	BIW	Confer with counsel for Debtor re: upcoming Insurer mediation	0.20	\$195.00
B155	10/02/24	BIW	Confer with counsel for Schools and RCBO re: settlement discussions	1.60	\$1,560.00
B155	10/02/24	JDP	Prepare for call with Welfare Corp attorneys (.4); confer with B. Weisenberg re: same (.2)	0.60	\$693.00
B155	10/03/24	BIW	Complete email to counsel for Schools re: settlement proposal	0.40	\$390.00
B155	10/03/24	BIW	Draft email to counsel for Debtor re: real estate disposition issues	0.30	\$292.50
B155	10/03/24	BIW	Draft several emails to Mediator re: response to request for clarity in counteroffer	0.30	\$292.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	10/03/24	JDP	Develop strategy re: including Welfare Corp in mediation (.5); review and edit draft email to Welfare Corp's counsel re: background info (.3)	0.80	\$924.00
B155	10/03/24	JDP	Review and respond to emails re: insurance mediation; confer with co-counsel re: same	0.40	\$462.00
B155	10/04/24	BIW	Confer with Mediator to prepare for mid-October mediation sessions	0.40	\$390.00
B155	10/04/24	JDP	Prepare for (.3) and participate in (.4) call with Judge Sontchi re: mediation	0.70	\$808.50
B155	10/04/24	JDP	Develop mediation strategy	2.20	\$2,541.00
B155	10/06/24	BIW	Revise Survivor Conference pleadings	0.80	\$780.00
B155	10/06/24	CF	Email communications re: finalizing survivors conference application	0.20	\$103.00
B155	10/07/24	BIW	Confer with K. McNally re: analysis of claims filed against Schools	0.40	\$390.00
B155	10/07/24	BIW	Confer with A. Uetz re: settlement negotiations	0.40	\$390.00
B155	10/07/24	BIW	Draft email to UST re: scheduling of Survivor Conference Motion	0.30	\$292.50
B155	10/07/24	BIW	Revise Motion to Shorten Time and B. Weisenberg Declaration in Support re: Survivor Conference Scheduling Motion	0.30	\$292.50
B155	10/07/24	BIW	Confer with counsel for Schools re: settlement negotiations	0.40	\$390.00
B155	10/07/24	BIW	Analyze strategy to drive resolution of case	1.10	\$1,072.50
B155	10/07/24	BIW	Confer with DWC and BRG re: real estate analyses	0.80	\$780.00
B155	10/07/24	BIW	Draft emails re: Insurer mediation preparation	0.40	\$390.00
B155	10/07/24	JDP	Call with BRG and D. Wilson Companies re: real estate valuation	0.80	\$924.00
B155	10/07/24	JDP	Review and edit motion for status conference for survivor statements (.3); confer with B. Weisenberg re: same (.1)	0.40	\$462.00
B155	10/08/24	BIW	Confer with BRG re: settlement structures	0.40	\$390.00
B155	10/08/24	BIW	Draft outline of potential settlement with Debtor	1.30	\$1,267.50
B155	10/08/24	BIW	Confer with counsel for Debtor to prepare for global mediation	1.10	\$1,072.50
B155	10/08/24	BIW	Review analysis of School liability	0.70	\$682.50
B155	10/08/24	BIW	Confer with DWC re: real estate value analysis	0.90	\$877.50
B155	10/08/24	BIW	Confer with Stout re: analysis of Schools liability	0.50	\$487.50
B155	10/08/24	BIW	Draft email outlining potential settlement structure	0.70	\$682.50
B155	10/08/24	BIW	Draft email to counsel for Schools re: request for certain information	0.20	\$195.00
B155	10/08/24	JDP	Confer with B. Weisenberg re: mediation	0.30	\$346.50
B155	10/09/24	BIW	Confer with J. Prol and J. Bair re: mediation preparation	0.40	\$390.00
B155	10/09/24	BIW	Review recent decision informing mediation strategy	0.90	\$877.50
B155	10/09/24	BIW	Review Child Protection Protocols in advance of conference to discuss same	0.90	\$877.50
B155	10/09/24	BIW	Draft alternative settlement scenarios	0.60	\$585.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	10/09/24	JDP	Develop mediation strategy	1.20	\$1,386.00
B155	10/09/24	JDP	Call with J. Bair and B. Weisenberg re: mediation preparation	0.40	\$462.00
B155	10/10/24	BIW	Confer with T. Burns to devise ways to expedite case resolution	0.30	\$292.50
B155	10/10/24	BIW	Confer with M. Kemner and M. Moore re: Child Protection Protocols	1.10	\$1,072.50
B155	10/10/24	BIW	Confer with Mediator to discuss alternative solutions to case resolution	0.60	\$585.00
B155	10/10/24	JDP	Review and comment on memo re: mediation strategy	0.70	\$808.50
B155	10/10/24	JDP	Confer with B. Weisenberg re: mediation strategy	0.30	\$346.50
B155	10/11/24	BIW	Confer with DWC and BRG re: real estate analysis	1.20	\$1,170.00
B155	10/11/24	BIW	Review email from Mediator re: agenda for upcoming mediation (.1); confer with J. Prol re: same (.2)	0.30	\$292.50
B155	10/11/24	BIW	Confer with Mediator re: mediation preparation	0.40	\$390.00
B155	10/11/24	BIW	Formulate settlement proposal	1.20	\$1,170.00
B155	10/11/24	BIW	Review Insurers' Plan Term Sheet	0.70	\$682.50
B155	10/11/24	JDP	Prepare for (.5) and participate in (1.2) call with BRG and D. Wilson Companies re: real estate valuation	1.70	\$1,963.50
B155	10/12/24	JDP	Review and comment on insurer draft assignment term sheet	0.70	\$808.50
B155	10/12/24	JDP	Review and analyze Judge Sontchi e-mail re: adding Welfare Corp to mediation	0.20	\$231.00
B155	10/14/24	BIW	Draft email to M. Vives re: valuation of Church real estate	0.30	\$292.50
B155	10/14/24	BIW	Review LMI Response to Survivor Statement Motion (.3); draft email re: same (.2)	0.50	\$487.50
B155	10/14/24	BIW	Prepare for mediation by reviewing analyses of cash and other assets	1.40	\$1,365.00
B155	10/14/24	BIW	Review Pacific's objection to Survivor Statement Motion	0.40	\$390.00
B155	10/15/24	BIW	Review proposed order modifying Mediation Order	0.20	\$195.00
B155	10/15/24	BIW	Confer with DWC re: valuation of Diocese real estate	0.90	\$877.50
B155	10/15/24	BIW	Confer with J. Prol re: insurance mediation issues	0.50	\$487.50
B155	10/15/24	BIW	Call with DWC re: real estate analyses	0.90	\$877.50
B155	10/15/24	BIW	Meet with T. Burns to discuss mediation strategy	1.40	\$1,365.00
B155	10/15/24	CF	Call with J. Prol, B. Weisenberg and Burns Bair re: survivors conference hearing (.5); call with J. Prol re: same (.1)	0.60	\$309.00
B155	10/15/24	JDP	Call with co-counsel re: insurance mediation strategy	1.40	\$1,617.00
B155	10/15/24	JDP	Calls with B. Weisenberg re: mediation strategy	0.50	\$577.50
B155	10/15/24	JDP	Review insurers' objections to motion to schedule status conference for survivor statements (.6); confer with B. Weisenberg re: same (.3); prepare for hearing (.4)	1.30	\$1,501.50
B155	10/15/24	JDP	Review real estate analysis to prepare for call with D. Wilson (.3); call with D. Wilson re: real estate analysis (.9)	1.20	\$1,386.00
B155	10/16/24	BIW	Attend mediation in Foley's San Francisco Office	8.10	\$7,897.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	10/16/24	CF	Draft reply to insurers' objection to survivor conference motion	0.20	\$103.00
B155	10/16/24	JDP	Participate in mediation via zoom (partial)	3.00	\$3,465.00
B155	10/17/24	BIW	Attend mediation in Foley's San Francisco Office	8.10	\$7,897.50
B155	10/17/24	BIW	Confer with counsel for Debtor re: settlement negotiations over Plan	0.40	\$390.00
B155	10/17/24	BIW	Confer with DWC re: real estate values	0.80	\$780.00
B155	10/17/24	CF	Review insurers' objections to survivor conference motion	1.80	\$927.00
B155	10/17/24	JDP	Call with T. Gallagher and Judge Newsome to prepare for insurance mediation	0.50	\$577.50
B155	10/17/24	JDP	Participate in mediation via zoom	2.50	\$2,887.50
B155	10/17/24	JDP	Review Los Angeles settlement; develop strategy; confer with B. Weisenberg re: same	0.50	\$577.50
B155	10/18/24	BIW	Confer with C. Frankel re: structure of brief in response to Insurer Objection to Survivor Statement Motion	0.40	\$390.00
B155	10/18/24	BIW	Review and revise Brief in Support of Survivor Statement Motion	1.60	\$1,560.00
B155	10/18/24	BIW	Continue revising Brief in Support of Survivor Statement Motion	1.40	\$1,365.00
B155	10/18/24	BIW	Analyze preliminary observations of DWC re: RCBO real estate	0.60	\$585.00
B155	10/18/24	CF	Revise reply in support of survivor conferences and proposed order re: same	2.30	\$1,184.50
B155	10/18/24	CF	Prepare reply to insurer objections to survivor conferences	6.50	\$3,347.50
B155	10/18/24	JDP	Confer with B. Weisenberg re: mediation strategy	0.40	\$462.00
B155	10/19/24	BIW	Confer with J. Prol (.3); revise Brief in Support of Survivor Statement Motion (.2)	0.50	\$487.50
B155	10/19/24	CF	Proof and revise reply to survivor conference objection (1); revise proposed order re: same (.4)	1.40	\$721.00
B155	10/19/24	CF	Email communications re: reply in support of survivors conference motion	0.20	\$103.00
B155	10/19/24	JDP	Review Pacific objection to survivor statement conferences (.4); review and edit draft reply (1.1); confer with B. Weisenberg re: strategy (.3)	1.80	\$2,079.00
B155	10/20/24	BIW	Draft email to DWC re: questions on real property	0.30	\$292.50
B155	10/21/24	BIW	Finalize Reply in Support of Survivor Statement Motion	0.90	\$877.50
B155	10/21/24	BIW	Confer with DWC re: Diocese real estate values	1.00	\$975.00
B155	10/21/24	JDP	Review D. Wilson Companies draft real estate analysis (.3); confer with D. Wilson Companies and BRG re: same (1.)	1.30	\$1,501.50
B155	10/21/24	JDP	Review and analyze draft insurer term sheet re: insurance neutrality and co-counsel comments re: same to prepare for mediation	1.20	\$1,386.00
B155	10/21/24	JDP	Review and edit revised reply in support of survivor statements	0.20	\$231.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	10/22/24	BIW	Review Pacific Insurers' Sur-Reply on survivor conference motion (.6); draft email re: same (.2)	0.80	\$780.00
B155	10/22/24	BIW	Confer with Mediator to prepare for early November mediation	0.40	\$390.00
B155	10/22/24	BIW	Attend Insurer mediation (partial)	1.40	\$1,365.00
B155	10/22/24	BIW	Draft email to counsel for Debtor re: DWC Initial Report	0.40	\$390.00
B155	10/22/24	CF	Call with B. Weisenberg re: hearing preparation research for survivor conferences hearing (.3); begin research re: same (.1)	0.40	\$206.00
B155	10/22/24	CG	Perform research to respond to insurer objection to survivor statements concerning affect on potential juries	1.10	\$605.00
B155	10/22/24	JDP	Participate in insurance mediation session via zoom, including discussions with mediators, joint sessions with Debtor and Insurers and consultation with co-counsel	3.50	\$4,042.50
B155	10/22/24	JDP	Prepare for November mediation	1.20	\$1,386.00
B155	10/22/24	JDP	Review and comment on Pacific Indemnity sur-reply in opposition to holding survivor status conferences (.6); develop strategy for hearing (.6)	1.20	\$1,386.00
B155	10/23/24	CF	Research statutory provisions authorizing survivor statements	1.40	\$721.00
B155	10/24/24	BIW	Revise proposed order granting Survivor Statement Conferences	0.70	\$682.50
B155	10/24/24	BIW	Confer with T. Burns re: draft insurance assignment language	0.70	\$682.50
B155	10/24/24	CF	Call with B. Weisenberg re: revisions to proposed order on survivor conferences (1.0); revise proposed order (1.0)	2.00	\$1,030.00
B155	10/24/24	CF	Research re: 105(d) to respond to Pacific sur reply on survivor statement conferences	0.80	\$412.00
B155	10/25/24	BIW	Meet with Mediator to discuss settlement proposal (.4); confer with J. Prol re: same (.4); draft email to BRG and DWC re: same (.2)	1.00	\$975.00
B155	10/25/24	BIW	Confer with counsel for Debtor re: Survivor Statement Conference issues (.2) and revised order in accordance with same (.4)	0.60	\$585.00
B155	10/25/24	BIW	Review and revise insurance mediation requests made by Mediators	0.60	\$585.00
B155	10/25/24	BIW	Draft email to counsel for Insurers re: revised order granting Status Conference Motion	0.40	\$390.00
B155	10/25/24	BIW	Meet with BRG re: analysis of recent settlement offer	0.30	\$292.50
B155	10/25/24	JDP	Analyze Bishop's counteroffer (.5); confer with B. Weisenberg re: same (.4); develop strategy for mediation (.3)	1.20	\$1,386.00
B155	10/25/24	JDP	Review and comment on insurance mediation talking points	0.30	\$346.50
B155	10/25/24	JDP	Develop protocols for presentation of survivor statements	1.40	\$1,617.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	10/25/24	JDP	Review and comment on revised form of order approving conferences for survivor statements	0.30	\$346.50
B155	10/26/24	BIW	Meet with Mediator to discuss settlement proposal	0.90	\$877.50
B155	10/26/24	JDP	Confer with mediator re: Bishop's counteroffer	0.90	\$1,039.50
B155	10/28/24	BIW	Confer with DWC and BRG re: valuation of Livermore property	0.90	\$877.50
B155	10/28/24	BIW	Confer with Committee member and counsel for Committee members re: prepare for Survivor Statement Conferences	1.30	\$1,267.50
B155	10/28/24	BIW	Confer with T. Burns re: settlement strategy (2 @.3 each)	0.60	\$585.00
B155	10/28/24	BIW	Review and comment on materials drafted in connection with Survivor Statement conferences	0.40	\$390.00
B155	10/28/24	BIW	Review Mediator's explanation of settlement proposal	0.50	\$487.50
B155	10/28/24	BIW	Confer with J. Prol re: settlement proposal and counter	0.60	\$585.00
B155	10/28/24	JDP	Call with Judge Sontchi re: settlement status	1.00	\$1,155.00
B155	10/28/24	JDP	Confer with B. Weisenberg re: Bishop's settlement counter-offer and strategy for survivor statements	0.60	\$693.00
B155	10/29/24	BIW	Confer with Mediator re: settlement proposal	1.00	\$975.00
B155	10/29/24	BIW	Draft several emails re: coordination of Survivor Statements	0.40	\$390.00
B155	10/29/24	BIW	Review Plan structure options	0.80	\$780.00
B155	10/29/24	BIW	Draft email to Mediator re: response to Debtor's proposal	1.20	\$1,170.00
B155	10/29/24	BIW	Re-confer with Mediator re: settlement proposal	0.50	\$487.50
B155	10/29/24	BIW	Draft email to BRG re: request for analysis in support of settlement proposals	0.30	\$292.50
B155	10/29/24	BIW	Review memo on claims allowance in bankruptcy	0.30	\$292.50
B155	10/29/24	JDP	Review and respond to Westport request to reschedule mediation and responses re: alternate dates	0.20	\$231.00
B155	10/29/24	JDP	Participate in call with Judge Sontchi re: debtor counter-proposal	0.80	\$924.00
B155	10/29/24	JDP	Develop, review and comment on survivor statement logistics	0.60	\$693.00
B155	10/29/24	JDP	Develop response to Bishop proposal	1.30	\$1,501.50
B155	10/30/24	BIW	Confer with G. Albert re: coordination of Survivor Statement Conference	0.30	\$292.50
B155	10/30/24	BIW	Confer with DWC re: update on Livermore property	0.30	\$292.50
B155	10/30/24	BIW	Revise pleading to facilitate case progress	0.70	\$682.50
B155	10/30/24	BIW	Review proofs of claim filed by Survivor Speakers	1.20	\$1,170.00
B155	10/30/24	BIW	Confer with DWC re: analysis of Livermore property	0.70	\$682.50
B155	10/30/24	BIW	Confer with BRG re: analysis of Diocese settlement offer	0.60	\$585.00
B155	10/30/24	BIW	Review and revise Survivor Statement Preparation Checklist	0.30	\$292.50
B155	10/30/24	JDP	Call with D. Wilson Companies and BRG re: valuation of Livermore	0.70	\$808.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	10/30/24	JDP	Review real estate analysis and develop mediation strategy	1.50	\$1,732.50
B155	10/31/24	BIW	Confer with Mediator re: settlement proposal	0.50	\$487.50
B155	10/31/24	BIW	Draft email summarizing settlement proposal	0.40	\$390.00
B155	10/31/24	BIW	Confer with T. Burns to prepare for insurance mediation	0.40	\$390.00
B155	10/31/24	BIW	Draft several emails re: coordinating Survivor Speaker Conferences	0.40	\$390.00
B155	10/31/24	BIW	Confer with T. Burns re: status of Insurer mediation and impact on mediation with Debtor	0.30	\$292.50
B155	10/31/24	BIW	Review Debtor's mark-up of Insurer Plan Term Sheet	0.80	\$780.00
B155	10/31/24	BIW	Confer with G. Albert re: coordination of Survivor Statement Conference	0.30	\$292.50
B155	10/31/24	BIW	Review proofs of claim filed by Survivor Speakers	1.20	\$1,170.00
B155	10/31/24	BIW	Confer with M. Kaplan and J. Prol re: status of mediation and next steps	1.00	\$975.00
B155	10/31/24	BIW	Confer with Mediator re: settlement proposal	0.30	\$292.50
B155	10/31/24	BIW	Confer with Survivor Speaker to prepare for 11/4/24 Survivor Speaker Conference	0.90	\$877.50
B155	10/31/24	CF	Case strategy call with J. Prol, M. Kaplan and B. Weisenberg	1.00	\$515.00
B155	10/31/24	JDP	Call with LS litigation team re: mediation status and alternatives	1.00	\$1,155.00
B155	10/31/24	JDP	Prepare for (.3) and participate in (1.5) Oakland insurance mediation	1.80	\$2,079.00
B155	10/31/24	MAK	Confer with LS team re: confirmation litigation strategy	1.00	\$955.00
B155	11/01/24	BIW	Confer with M. Lee re: status of negotiations	0.50	\$487.50
B155	11/01/24	BIW	Confer with T. Burns re: debrief on insurance mediation	0.90	\$877.50
B155	11/01/24	BIW	Confer with Mediator re: settlement proposal	0.30	\$292.50
B155	11/01/24	BIW	Follow-up with Mediator re: settlement proposal	0.20	\$195.00
B155	11/01/24	JDP	Call with B. Weisenberg and G. Albert to prepare for survivor statement hearing	0.50	\$577.50
B155	11/01/24	JDP	Develop strategy for mediation	1.50	\$1,732.50
B155	11/04/24	JDP	Call with mediator re: status and next steps	0.40	\$462.00
B155	11/05/24	BIW	Review analysis of Debtor settlement funding	0.50	\$487.50
B155	11/06/24	BIW	Call with J. Prol re: next steps (.3); confer with Mediator re: same (.4)	0.70	\$682.50
B155	11/06/24	JDP	Call with Judge Sontchi re: next steps	0.40	\$462.00
B155	11/06/24	JDP	Strategize with B. Weisenberg re: next steps	0.30	\$346.50
B155	11/13/24	BIW	Confer with Mediator re: update on status of mediation	0.30	\$292.50
B155	12/10/24	BIW	Confer with Mediator re: status of proceedings	0.30	\$292.50
B155	12/16/24	BIW	Review final DWC Report	0.80	\$780.00
B155	12/20/24	BIW	Confer with counsel for Debtor re: potential mediation session	0.80	\$780.00
B155	12/20/24	CMR	Summary review of mediation materials	0.50	\$447.50
B155	12/21/24	BIW	Review Debtor's comments to Mediation Motion (.2); draft email in response to same (.1)	0.30	\$292.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	12/21/24	BIW	Confer with T. Burns re: potential mediation session	0.60	\$585.00
B155	12/23/24	BIW	Begin drafting Objection to Motion to Shorten and to Mediation Motion	1.40	\$1,365.00
B155	12/24/24	BIW	Continue drafting Objection to Motion to Shorten and to Mediation Motion	0.90	\$877.50
B155	12/24/24	BIW	Revise Objection to Motion to Shorten and to Mediation Motion	0.80	\$780.00
B155	12/24/24	JDP	Review and edit draft objection to debtor's motion to compel mediation (1.6); confer with B. Weisenberg re: same (.30)	1.90	\$2,194.50
B155	12/26/24	JDP	Review and edit draft objection to motion to shorten time on debtor's motion for mediation	0.40	\$462.00
B155	12/30/24	BIW	Draft email to G. Albert re: filing of Objection to Motion to Shorten, if needed	0.20	\$195.00
Total B155 - Mediation				280.60	\$274,533.50
<u>B160 Fee/Employment Applications</u>					
B160	09/05/24	DC	Prepare draft budget for fifth interim period	1.20	\$408.00
B160	09/06/24	BIW	Revise Fifth Interim Budget and Staffing Plan	0.40	\$390.00
B160	09/06/24	DC	Review fee examiner report and Order Approving Interim Fee Applications, apply discount and reconcile amounts owed	0.50	\$170.00
B160	09/06/24	DC	Edit and format fifth interim budget	0.20	\$68.00
B160	09/10/24	DC	Download and circulate CNO for LS' July monthly fee statement, together with payment request	0.10	\$34.00
B160	09/25/24	DC	Prepare LS Fifteenth Monthly Fee Statement with exhibits, update fee application chart	0.40	\$136.00
B160	09/30/24	DC	Update fee application status chart and critical dates memo	0.20	\$68.00
B160	10/03/24	DC	Continue drafting LS' Fourth Interim Fee Application	4.40	\$1,496.00
B160	10/04/24	DC	Continue drafting LS' Fourth Interim Fee Application with exhibits	1.40	\$476.00
B160	10/09/24	DC	Continue drafting LS' Fourth Interim Fee Application	2.20	\$748.00
B160	10/10/24	BIW	Review and revise Fourth Interim Fee Application pleadings	0.80	\$780.00
B160	10/10/24	DC	Further revisions to LS' Fourth Interim Fee Application	0.50	\$170.00
B160	10/14/24	DC	Edit and format LS' Fourth Interim Fee Application and compile packages for review by local counsel	0.60	\$204.00
B160	10/15/24	DC	Receipt of Declaration from Committee Chairperson, compile exhibits to fourth interim fee application and forward same to local counsel	0.30	\$102.00
B160	10/16/24	DC	Review and download filed interim fee applications and update fee application status chart for posted invoices	0.20	\$68.00
B160	10/16/24	DC	Coordinate preparation of LEDES files for LS' fourth interim fee application and transmit to US trustee	0.20	\$68.00
B160	10/28/24	DC	Prepare Sixteenth Monthly Fee Statement with exhibits	0.40	\$136.00
B160	10/29/24	DC	Respond to e-mail from KBK re: exhibits for LS' Sixteenth Monthly Fee Statement	0.10	\$34.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B160	11/11/24	DC	Review docket for objections to LS September monthly fee statement and coordinate CNO with local counsel	0.10	\$34.00
B160	11/26/24	JDP	Draft response to fee examiner interim report on 4th interim fee application	0.60	\$693.00
B160	11/27/24	DC	Draft LS' Seventeenth Monthly Fee Statement with exhibits for filing	0.50	\$170.00
B160	11/27/24	JDP	Finalize response to fee examiner interim report on fourth interim fee application	0.30	\$346.50
B160	12/04/24	DC	Respond to e-mail from J. Prol re: application of discount for fourth interim period and reconcile amounts owed	0.20	\$68.00
B160	12/09/24	DC	Tend to electronic filing of pro hac vice application for N. Fulfree	0.30	\$102.00
B160	12/11/24	BIW	Draft Declaration in Support of Interim Fee Applications as requested by Court	0.80	\$780.00
B160	12/11/24	DC	Discussions with B. Weisenberg and E. Lawler re: Supplemental Declaration in further support of LS' fourth interim fee application	0.20	\$68.00
B160	12/11/24	DC	Review docket for CNO and update fee application status chart	0.10	\$34.00
B160	12/11/24	EBL	Work on supplemental declaration re: LS fourth interim fee application	1.90	\$655.50
B160	12/11/24	JDP	Review draft declaration in further support of LS and BRG interim fee applications; confer with B. Weisenberg re: same	0.30	\$346.50
B160	12/13/24	DC	Review proposed omnibus order approving fourth interim fee applications, reconcile amounts owed after voluntary reduction and draft summary e-mail to B. Weisenberg (.5); draft e-mail to Debtor's counsel regarding proposed revisions (.2)	0.70	\$238.00
B160	12/13/24	DC	Review and revise proposed fifth interim budget	0.50	\$170.00
B160	12/16/24	DC	Revise, format and finalize fifth interim budget	0.80	\$272.00
B160	12/17/24	DC	Prepare Notice of Rate Increase Effective January 1, 2025	0.50	\$170.00
B160	12/19/24	DC	Revise, format and finalize Notice of Rate Increase	0.30	\$102.00
B160	12/23/24	EBL	Prepare and finalize Lowenstein's November monthly fee statement; emails with B Weisenberg re: same; coordinate filing with local counsel	0.60	\$207.00
B160	12/30/24	DC	Review omnibus order approving fourth interim fee applications, process write-off, reconcile fees and update fee application status chart	0.50	\$170.00
Total B160 - Fee/Employment Applications				23.30	\$10,182.50
<u>B165 Employment and Retention Applications - Others</u>					
B165	10/11/24	BIW	Confer with BRG re: terms of retention of independent contractor	0.30	\$292.50
B165	11/21/24	DC	Prepare application for pro hac vice admission of N. Fulfree and process Certificate of Good Standing from USDC SDNY	0.80	\$272.00
B165	11/26/24	DC	Revise pro hac application for N. Fulfree	0.30	\$102.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B165	12/05/24	BIW	Review draft of Unknown Claims Representative pleadings	0.60	\$585.00
B165	12/09/24	BIW	Confer with M. Lee re: Future Claims Representative issues	0.30	\$292.50
B165	12/10/24	BIW	Review Unknown Claims Representative pleadings and draft email to Committee re: same	0.90	\$877.50
B165	12/11/24	JDP	Review debtor's application to retain Judge Hogan as unknown claims representative; review and comment on memo and recommendation to committee	0.40	\$462.00
B165	12/12/24	BIW	Draft responsive email to counsel for Committee member re: retention of Unknown Claim Representative	0.40	\$390.00
Total B165 - Employment and Retention Applications - Others				4.00	\$3,273.50
<u>B175 Fee Applications and Invoices - Others</u>					
B175	09/27/24	BIW	Draft email to DWC re: interim compensation issues	0.30	\$292.50
B175	09/27/24	BIW	Review Stout August Monthly Fee Statement and comment to protect privileged information	0.40	\$390.00
B175	09/28/24	BIW	Draft email to DWC Team re: guidance on fee statements	0.30	\$292.50
B175	10/06/24	BIW	Review VeraCruz July 2024 invoice and time detail	0.30	\$292.50
B175	10/15/24	BIW	Review Debtor professional Interim Fee Applications	0.40	\$390.00
B175	12/21/24	BIW	Draft email to A. Uetz re: DWC Final Payment	0.20	\$195.00
Total B175 - Fee Applications and Invoices - Others				1.90	\$1,852.50
<u>B200 - Operations</u>					
<u>B210 Business Operations</u>					
B210	09/13/24	BIW	Review July MOR	0.30	\$292.50
B210	12/20/24	BIW	Review November 2024 MOR	0.30	\$292.50
Total B210 - Business Operations				0.60	\$585.00
<u>B300 - Claims and Plan</u>					
<u>B310 Claims Administration and Objections</u>					
B310	10/04/24	BIW	Review Insurers' letter requesting access to proofs of claim	0.20	\$195.00
B310	10/06/24	BIW	Draft emails re: Insurer expert request for Survivor Claims	0.20	\$195.00
B310	10/09/24	BIW	Confer with counsel for Pacific re: request for unredacted proofs of claim filed by Survivors	0.40	\$390.00
B310	10/09/24	BIW	Review Insurers' request for unredacted Survivor Claims and documents in connection with same	0.60	\$585.00
B310	10/13/24	BIW	Review draft Stipulation to Modify Bar Date Order (.2); revise same (.6)	0.80	\$780.00
B310	10/15/24	BIW	Review and revise Order modifying Bar Date Order	0.30	\$292.50
B310	10/15/24	CF	Draft memo re: claims valuation	1.50	\$772.50
B310	10/16/24	BIW	Draft email to J. Daniels re: proposed revisions to Expert Claim Order	0.20	\$195.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B310	10/16/24	BIW	Review memo on claims allowance and valuation and provide comments to same	0.40	\$390.00
B310	10/17/24	BIW	Draft emails to counsel for Insurers re: revisions to Expert Claim Order	0.30	\$292.50
B310	10/24/24	BIW	Draft emails re: service of Stipulation on Experts viewing POCs	0.20	\$195.00
B310	10/24/24	DC	E-mails with B. Weisenberg re: service of Expert POC Confidentiality Stipulation on all counsel for claimants (.4); Review service lists and coordinate service via e-mail (.5); revise and supplement service e-mail to all counsel and confer with B. Weisenberg re: same (.3)	1.20	\$408.00
B310	10/25/24	DC	Review Verita Claims Register and prepare service list of all state court counsel	1.60	\$544.00
B310	10/28/24	CF	Claims valuation research	2.50	\$1,287.50
B310	10/29/24	CF	Revise claims estimation memo	2.20	\$1,133.00
B310	10/30/24	BMC	Compile survivor proofs of claim (.2); email same to J. Prol, B. Weisenberg, and G. Albert (.1)	0.30	\$163.50
B310	10/31/24	BMC	Emails with G. Albert and B. Weisenberg re: survivor proof of claims	0.20	\$109.00
B310	11/25/24	BIW	Confer with J. Prol and LS team re: preparing objection to OPF claim	0.40	\$390.00
B310	11/25/24	CG	Review and analyze debtor's schedules for Oakland Parochial Fund claim	0.40	\$220.00
B310	11/25/24	JDP	Confer with LS team re: filing objection to OPF claim	0.40	\$462.00
B310	11/25/24	NF	Call with Lowenstein team re: OPF Claim (.4); follow up discussion with C. Frankel (.2); strategize re: OPF claim objection and emails re: same (.4)	1.00	\$1,040.00
B310	12/02/24	BMC	Review and compile certain of the Survivor's proofs of claims for B. Weisenberg	0.70	\$381.50
B310	12/03/24	BMC	Review and analyze survivor proofs of claim (.5); confer with B. Weisenberg re: same (.2)	0.70	\$381.50
B310	12/05/24	BMC	Review and analyze survivor proofs of claim (1.0); meet with R. Simons re: filed proofs of claim (.5); draft email to B. Weisenberg re: same (.4)	1.90	\$1,035.50
B310	12/05/24	CF	Draft Oakland parochial group claim objection	4.30	\$2,214.50
B310	12/06/24	BIW	Confer with proposed Unknown Claims Representative	0.70	\$682.50
B310	12/08/24	CF	Draft objection to OPF claim	4.30	\$2,214.50
B310	12/09/24	BIW	Review OPF Claim Objection	0.40	\$390.00
B310	12/09/24	BMC	Emails with B. Weisenberg re: survivor proof of claims reconciliation (.1); review and analyze same (.1)	0.20	\$109.00
B310	12/09/24	CF	Draft OPF claim objection	9.10	\$4,686.50
B310	12/10/24	BIW	Draft email to Stout re: confusion of claimant name and supplement	0.20	\$195.00
B310	12/10/24	CF	Revise OPF claim objection	9.50	\$4,892.50
B310	12/11/24	BIW	Confer with Stout re: issues with Survivor Claim filings	0.50	\$487.50
B310	12/11/24	BIW	Review proofs of claim filed by Survivor Speakers	0.90	\$877.50
B310	12/11/24	BIW	Review and revise OPF Claim Objection	1.20	\$1,170.00
B310	12/11/24	BIW	Further revise OPF Claim Objection	0.90	\$877.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B310	12/11/24	CF	Confer with N. Fulfree re: OPF claim objection (.2); revise OPF claim objection (.9)	1.10	\$566.50
B310	12/11/24	CF	Revise OPF claim objection	0.70	\$360.50
B310	12/11/24	CF	Finalize OPF claim objection (4.8); call with N. Fulfree re: same (.8)	5.60	\$2,884.00
B310	12/11/24	JDP	Review and comment on OPF claim objection	1.20	\$1,386.00
Total B310 - Claims Administration and Objections				59.40	\$35,832.00
<u>B320 Plan and Disclosure Statement (including Business Plan)</u>					
B320	09/04/24	BIW	Strategize re: plan formulation	0.70	\$682.50
B320	09/05/24	BIW	Devise plan formulation strategy	1.70	\$1,657.50
B320	09/05/24	BIW	Continue devising plan formulation strategy	1.20	\$1,170.00
B320	09/12/24	BIW	Revise Plan Term Sheet	1.20	\$1,170.00
B320	09/12/24	BIW	Draft summary of Term Sheet	0.60	\$585.00
B320	09/13/24	BIW	Revise Plan Term Sheet and related documents	1.10	\$1,072.50
B320	09/18/24	BIW	Outline Plan of Reorganization structure	1.10	\$1,072.50
B320	09/19/24	BIW	Outline Plan of Reorganization structure	1.30	\$1,267.50
B320	09/20/24	BIW	Devise Plan of Reorganization structures	1.20	\$1,170.00
B320	09/23/24	BIW	Revise Settlement Term Sheet	1.30	\$1,267.50
B320	09/23/24	BIW	Revise Settlement Term Sheet	0.60	\$585.00
B320	09/24/24	CF	Research hypothetical liquidation test	0.60	\$309.00
B320	09/27/24	BIW	Review and revise Child Protection Protocols	1.30	\$1,267.50
B320	09/30/24	BIW	Revise Child Protection Protocols	1.40	\$1,365.00
B320	09/30/24	BIW	Finalize revisions to Child Protection Protocols	1.10	\$1,072.50
B320	10/11/24	CF	Research re: absolute priority rule	0.60	\$309.00
B320	10/13/24	CF	Research re: absolute priority rule	1.10	\$566.50
B320	10/14/24	BIW	Confer with C. Frankel re: application of absolute priority rule to nonprofits	0.50	\$487.50
B320	10/14/24	CF	Research re: absolute priority rule	3.80	\$1,957.00
B320	10/14/24	CF	Call with B. Weisenberg re: absolute priority and claims valuation research	0.50	\$257.50
B320	10/15/24	CF	Research re: absolute priority rule	1.50	\$772.50
B320	10/18/24	BIW	Review and revise Child Protection Protocols	1.20	\$1,170.00
B320	10/19/24	BIW	Review and revise Child Protection Protocols	0.90	\$877.50
B320	10/21/24	BIW	Review and revise Child Protection Protocols	2.10	\$2,047.50
B320	10/24/24	BIW	Finalize next iteration of Child Protection Protocols	2.20	\$2,145.00
B320	10/24/24	BIW	Analyze plan provisions	1.10	\$1,072.50
B320	10/24/24	JDP	Review and comment on revised child protection protocols	1.20	\$1,386.00
B320	10/29/24	BIW	Review recent Vatican report on Safeguarding of Minors	0.90	\$877.50
B320	10/30/24	BIW	Research Plan implementation mechanisms	1.30	\$1,267.50
B320	10/30/24	JDP	Review revised child protection protocols in preparation for mediation	1.30	\$1,501.50
B320	11/05/24	BIW	Prepare for objection to impending Disclosure Statement	1.30	\$1,267.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/07/24	CF	Review and research case law for disclosure statement objection	1.10	\$566.50
B320	11/08/24	BIW	Review Debtor's Plan and Disclosure Statement	1.20	\$1,170.00
B320	11/08/24	DC	Download Plan and Disclosure Statement, update electronic files and calendar	0.40	\$136.00
B320	11/08/24	JDP	Preliminary review of RCBO filed Plan	0.80	\$924.00
B320	11/08/24	JDP	Outline disclosure statement objection	1.20	\$1,386.00
B320	11/09/24	BIW	Draft email to Committee professionals re: filed plan and Disclosure Statement	0.10	\$97.50
B320	11/09/24	BIW	Review and comment on Disclosure Statement to outline objection to same	1.40	\$1,365.00
B320	11/09/24	BIW	Confer with junior associates re: legal research and objection arguments	0.80	\$780.00
B320	11/09/24	BMC	Review and analyze Debtor's plan and disclosure statement	2.30	\$1,253.50
B320	11/09/24	CF	Review and note-take re: plan and disclosure statement	4.30	\$2,214.50
B320	11/09/24	JDP	Review and analyze RCBO Plan and Disclosure Statement	3.50	\$4,042.50
B320	11/09/24	JDP	Develop strategy and theories for response to RCBO Plan filing	3.00	\$3,465.00
B320	11/11/24	BIW	Confer with J. Prol and Team re: outline of objection to Debtor's Disclosure Statement	1.20	\$1,170.00
B320	11/11/24	BIW	Confer with Stout re: analyze Debtor's claims valuation in Disclosure Statement	0.30	\$292.50
B320	11/11/24	BIW	Outline objections to Disclosure Statement	0.80	\$780.00
B320	11/11/24	BIW	Draft inserts to Disclosure Statement Objection	0.70	\$682.50
B320	11/11/24	JDP	Continued review and analysis of RCBO Plan and Disclosure Statement	2.20	\$2,541.00
B320	11/11/24	JDP	Review and comment on outline for objection to Disclosure Statement	1.50	\$1,732.50
B320	11/11/24	JDP	Call with LS team re: outline of objection to approval of disclosure statement	1.20	\$1,386.00
B320	11/11/24	MAK	Review and analyze debtor's proposed Plan and Disclosure Statement	1.90	\$1,814.50
B320	11/12/24	BIW	Draft Disclosure Statement Objection	2.20	\$2,145.00
B320	11/12/24	BIW	Continue to draft Disclosure Statement Objection	2.80	\$2,730.00
B320	11/12/24	BIW	Continue to draft Disclosure Statement Objection	1.80	\$1,755.00
B320	11/12/24	CF	Draft disclosure statement objection	1.80	\$927.00
B320	11/12/24	JDP	Review and comment on research on disclosure statement objection	0.40	\$462.00
B320	11/13/24	BIW	Review Motion to Approve Disclosure Statement and all exhibits	1.40	\$1,365.00
B320	11/13/24	BIW	Continue to draft Disclosure Statement Objection; participate in call with BRG re: same	1.40	\$1,365.00
B320	11/13/24	BIW	Continue to draft Disclosure Statement Objection	2.60	\$2,535.00
B320	11/13/24	CG	Review and analyze ninth circuit law on disclosure statement objection	4.60	\$2,530.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	11/13/24	JDP	Prepare for and participate in call with BRG re: objection to DS	0.80	\$924.00
B320	11/13/24	JDP	Continued review and analysis of DS and Plan	2.20	\$2,541.00
B320	11/14/24	BIW	Continue to draft Disclosure Statement Objection	0.90	\$877.50
B320	11/14/24	CG	Review and analyze ninth circuit case law for disclosure statement objection	2.80	\$1,540.00
B320	11/14/24	MAK	Review and analyze debtor's motion to approve disclosure statement	1.70	\$1,623.50
B320	11/15/24	BIW	Continue to draft Disclosure Statement Objection	0.60	\$585.00
B320	11/15/24	BIW	Confer with BRG re: Plan analysis	0.40	\$390.00
B320	11/15/24	CG	Review and analyze case law and incorporate same into research memorandum on disclosure statement objection	1.90	\$1,045.00
B320	11/18/24	BIW	Revise Objection to Disclosure Statement	1.20	\$1,170.00
B320	11/18/24	BIW	Further revise Objection to Disclosure Statement	1.70	\$1,657.50
B320	11/19/24	BIW	Review and revise Objection to Disclosure Statement	2.40	\$2,340.00
B320	11/19/24	BIW	Review research on intersection of bankruptcy and religious freedom	1.20	\$1,170.00
B320	11/20/24	BIW	Review and revise Objection to Disclosure Statement and related research	1.40	\$1,365.00
B320	11/20/24	BIW	Incorporate research on intersection of bankruptcy and religious freedom into disclosure statement objection	1.40	\$1,365.00
B320	11/21/24	BIW	Review Debtor's Disclosure Statement	2.60	\$2,535.00
B320	11/22/24	BIW	Continue to review Debtor's Disclosure Statement and revise Disclosure Statement Objection	2.10	\$2,047.50
B320	11/22/24	BIW	Review and revise Objection to Disclosure Statement	0.90	\$877.50
B320	11/22/24	JDP	Review and analyze Plan and Disclosure Statement	2.50	\$2,887.50
B320	11/25/24	BIW	Review and revise Objection to Disclosure Statement and related research	1.80	\$1,755.00
B320	11/25/24	BIW	Review and revise Objection to Disclosure Statement and related research	1.30	\$1,267.50
B320	11/25/24	CG	Review and analyze ninth circuit case law on religious freedom laws impeding property of the estate issues	1.60	\$880.00
B320	11/25/24	JDP	Review and analyze Debtor's plan and disclosure statement	3.40	\$3,927.00
B320	11/26/24	BIW	Review and revise Objection to Disclosure Statement and related research	1.90	\$1,852.50
B320	11/26/24	BIW	Confer with BRG re: analysis of Debtor's liquidation analysis	0.50	\$487.50
B320	11/26/24	JDP	Review and analyze Debtor's plan and disclosure statement	2.40	\$2,772.00
B320	11/27/24	CG	Investigate and review ninth circuit case law and incorporate same into disclosure statement objection	2.20	\$1,210.00
B320	11/27/24	JDP	Review and analyze Debtor's plan and disclosure statement	2.60	\$3,003.00
B320	11/29/24	JDP	Review and edit draft objection to disclosure statement	2.20	\$2,541.00
B320	12/01/24	BIW	Revise Objection to Disclosure Statement	1.10	\$1,072.50
B320	12/02/24	BIW	Revise Objection to Disclosure Statement	2.40	\$2,340.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	12/02/24	BIW	Revise Objection to Disclosure Statement	2.10	\$2,047.50
B320	12/02/24	CG	Call with B. Weisenberg (.3); analyze debtor's schedules to find litigation claimants (1.1); research re: whether unknown claim reps can vote on a plan (2.7)	4.10	\$2,255.00
B320	12/02/24	CG	Review and analyze disclosure statement objection and all related exhibits and cases cited therein (2.0); analyze docket entries from cited cases, and citation rules and procedures to cite same (1.0)	3.00	\$1,650.00
B320	12/02/24	JDP	Review and edit objection to approval of debtor's disclosure statement	2.60	\$3,003.00
B320	12/03/24	BIW	Review, and comment on, research on Plan confirmation issues	0.90	\$877.50
B320	12/03/24	BIW	Revise Objection to Disclosure Statement	1.40	\$1,365.00
B320	12/03/24	CG	Meet and strategize with B. Weisenberg re: disclosure statement objection section 524g argument	0.40	\$220.00
B320	12/03/24	CG	Review and analyze prior catholic diocese confirmed cases re: whether group of unknown claimants can be impaired voting class under plan	3.40	\$1,870.00
B320	12/03/24	CG	Research re: disclosure statement artificial impairment	0.80	\$440.00
B320	12/03/24	CG	Review and analyze disclosure statement objections for citation and case law errors (.4); review all relevant documents and exhibits to confirm validity of same (.4)	0.80	\$440.00
B320	12/03/24	JDP	Review and edit revised draft of objection to Debtor's disclosure statement	1.70	\$1,963.50
B320	12/03/24	PJG	Initial research re: 524(g), plan classification re: future claimants, and FCR voting rights re: same; review cases and articles re: same	3.30	\$3,283.50
B320	12/04/24	BIW	Review research on Plan confirmation issues	0.70	\$682.50
B320	12/04/24	BIW	Revise Objection to Disclosure Statement	0.80	\$780.00
B320	12/04/24	BIW	Confer with M. Kaplan re: Plan confirmation discovery and trial	0.30	\$292.50
B320	12/04/24	BIW	Review research conducted on class voting	0.80	\$780.00
B320	12/04/24	BIW	Confer with P. Shields re: chart needed to accompany Disclosure Statement Objection	0.20	\$195.00
B320	12/04/24	BIW	Review transcripts from hearings on Disclosure Statements in other diocesan cases	1.10	\$1,072.50
B320	12/04/24	CD	Discuss strategy for discovery with M. Kaplan (0.2); compile discovery from Camden, Syracuse, and Rochester cases (1.2)	1.40	\$840.00
B320	12/04/24	CG	Edit, revise, and bluebook disclosure statement objection (8.0); update ninth circuit case law (3.8)	11.80	\$6,490.00
B320	12/04/24	JDP	E-mails to/from BRG re: strategy for addressing charts in DS re: recoveries in other diocese bankruptcy cases	0.30	\$346.50
B320	12/04/24	JDP	Review and revise draft disclosure statement objection	2.70	\$3,118.50
B320	12/04/24	PJG	Additional detailed research re: 524(g), FCR, future tort claims/demands and nature of same (3.2); call re: same with J. Prol (.2)	3.40	\$3,383.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	12/04/24	PJG	Draft detailed memorandum re: Role of Future Claimants' Representative & Issue of Plan Voting for Future Claims/Demands, and possible bases for objection to improper classification of such claims	3.80	\$3,781.00
B320	12/05/24	BIW	Revise Objection to Disclosure Statement	1.80	\$1,755.00
B320	12/05/24	CD	Review confirmation discovery from other Diocese cases and develop discovery plan	1.20	\$720.00
B320	12/05/24	CG	Perform artificial impairment research (3.0); participate and prepare for call with E. Seltzer re: same (.5)	3.50	\$1,925.00
B320	12/05/24	CG	Revise disclosure statement objection	2.70	\$1,485.00
B320	12/05/24	JDP	Review and edit disclosure statement objection	1.40	\$1,617.00
B320	12/05/24	MAK	Begin outlining discovery topics and tools for contested confirmation (1.6); review and analyze discovery served and contested in recent diocesan bankruptcy cases (3.3)	4.90	\$4,679.50
B320	12/06/24	BIW	Finalize Objection to Disclosure Statement	1.80	\$1,755.00
B320	12/06/24	CD	Draft plan confirmation discovery	2.50	\$1,500.00
B320	12/06/24	CG	Cite check disclosure statement objection	0.40	\$220.00
B320	12/06/24	CG	Perform research and analyze case law re artificial impairment in the ninth circuit (.6); call with E. Seltzer (.2)	0.80	\$440.00
B320	12/06/24	JDP	Review and edit objection to disclosure statement	2.50	\$2,887.50
B320	12/06/24	MAK	Continue review and analysis of discovery served and contested in recent diocesan bankruptcy cases	3.10	\$2,960.50
B320	12/07/24	BIW	Review comments to Objection to Disclosure Statement and implement same (.4); confer with J. Prol re: same (.4)	0.80	\$780.00
B320	12/07/24	JDP	Confer with B. Weisenberg re: disclosure statement objection	0.40	\$462.00
B320	12/07/24	JDP	Review and edit objection to disclosure statement	2.20	\$2,541.00
B320	12/08/24	BIW	Review comments to Objection to Disclosure Statement by Burns Bair and implement same	0.90	\$877.50
B320	12/08/24	CG	Perform research into prior catholic diocese bankruptcy cases re: unknown claims representatives and their entitlement to vote on plan	2.70	\$1,485.00
B320	12/09/24	BIW	Review final comments to Objection to Disclosure Statement and implement same	1.30	\$1,267.50
B320	12/09/24	CG	Research and investigate other catholic diocese case pleadings re: length of time for unknown claims representative to issue findings report (4.0); draft chart of findings re: same (1.3); draft insert for disclosure statement objection (1.0)	6.30	\$3,465.00
B320	12/09/24	JDP	Review and edit objection to disclosure statement	2.20	\$2,541.00
B320	12/09/24	MAK	Review and analyze draft objection to disclosure statement (1.0); confer with B. Weisenberg re: the same (.3)	1.30	\$1,241.50
B320	12/09/24	MAK	Review recent decisions on insurer standing to prepare for confirmation litigation	1.90	\$1,814.50
B320	12/10/24	BIW	Review recent case on Insurer standing in anticipation of Plan confirmation hearings	0.80	\$780.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	12/10/24	BIW	Review UST's Disclosure Statement Objection	0.30	\$292.50
B320	12/10/24	BIW	Review comments to Disclosure Statement Objection	0.40	\$390.00
B320	12/10/24	MAK	Review recent decisions on insurer standing to prepare for confirmation litigation	1.40	\$1,337.00
B320	12/10/24	MAK	Continue review and analysis of discovery served and contested in recent diocesan bankruptcy cases	2.70	\$2,578.50
B320	12/11/24	BIW	Finalize Disclosure Statement Objection	0.70	\$682.50
B320	12/11/24	CG	Call with B. Weisenberg re disclosure statement objection citation corrections	0.10	\$55.00
B320	12/11/24	JDP	Review final version of disclosure statement objection	1.20	\$1,386.00
B320	12/11/24	JDP	Confer with B. Weisenberg re: disclosure statement objection	0.30	\$346.50
B320	12/12/24	JDP	Confer with counsel to committee member re: disclosure statement objection	0.30	\$346.50
B320	12/13/24	MAK	Continue review and analysis of discovery served and contested in recent diocesan bankruptcy cases	3.60	\$3,438.00
B320	12/14/24	JDP	Develop strategy for disclosure statement hearing	1.20	\$1,386.00
B320	12/16/24	EJS	Research issues in Debtor's Reply to Disclosure Statement Objection (3.7); review and analyze filed Reply (1.2)	4.90	\$3,503.50
B320	12/16/24	MAK	Review and analyze contested discovery and resolutions of the same in recent diocesan cases	2.90	\$2,769.50
B320	12/17/24	BIW	Review Debtor's Reply to Committee's Objection to Disclosure Statement (.6); draft email outlining issues to research (.5)	1.10	\$1,072.50
B320	12/17/24	BIW	Review Debtor's Reply to Objection to Disclosure Statement filed by U.S. Trustee	0.40	\$390.00
B320	12/17/24	BIW	Confer with J. Prol to prepare for Disclosure Statement hearing	0.80	\$780.00
B320	12/17/24	CF	Review Debtor reply to disclosure statement objection and research re: same	1.10	\$566.50
B320	12/17/24	EJS	Assist with preparation for disclosure statement hearing (1.5); research response re: asset and claim valuation (5.6); draft internal memo re: same (1.8); research response re: good faith (2.5); draft internal memo re: same (.7); email correspondence with Lowenstein team re: various Disclosure Statement issues (.2)	12.30	\$8,794.50
B320	12/17/24	JDP	Review and analyze Debtor's reply in support of approval of disclosure statement	1.80	\$2,079.00
B320	12/17/24	MAK	Review and analyze contested discovery and resolutions of the same in recent diocesan cases	1.30	\$1,241.50
B320	12/18/24	JDP	Prepare for hearing on adequacy of disclosure statement	2.30	\$2,656.50
B320	12/19/24	BIW	Begin drafting Appendix to Disclosure Statement	1.20	\$1,170.00
B320	12/19/24	CMR	Call with B. Weisenberg re: disclosure statement and pending issues	0.60	\$537.00
B320	12/19/24	EJS	Call with B. Weisenberg re Appendix A to Disclosure Statement (.2); review precedent in connection with same (.5); email correspondence with Lowenstein team re Disclosure Statement-related workstreams (.1)	0.80	\$572.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	12/20/24	BIW	Continue drafting Appendix to Disclosure Statement	2.20	\$2,145.00
B320	12/20/24	BIW	Confer with Stout and BRG re: analysis of Debtor's comparable recovery analysis (.5) and draft email re: same (.4)	0.90	\$877.50
B320	12/20/24	BIW	Review caselaw on intersection of First Amendment and civil law	1.10	\$1,072.50
B320	12/20/24	EJS	Draft Appendix A to Disclosure Statement (5.9); call (.1) and email correspondence (.1) with B. Weisenberg re same;	6.10	\$4,361.50
B320	12/21/24	BIW	Confer with BRG re: liquidation analysis	1.10	\$1,072.50
B320	12/21/24	BIW	Continue drafting Appendix to Disclosure Statement	0.50	\$487.50
B320	12/21/24	JDP	Call with BRG re: disclosure statement objection	0.70	\$808.50
B320	12/21/24	MAK	Conference call re: strategy on liquidation analysis	0.90	\$859.50
B320	12/23/24	BIW	Finalize first draft of Committee Solicitation Letter	0.60	\$585.00
B320	12/23/24	JDP	Review and edit draft disclosure statement appendix	4.00	\$4,620.00
B320	12/25/24	MAK	Review and analyze contested discovery and resolutions of the same in recent diocesan cases	2.20	\$2,101.00
B320	12/26/24	JDP	Review and revise draft disclosure statement appendix	1.80	\$2,079.00
B320	12/27/24	CMR	Summary review of Plan and Disclosure Statement	1.50	\$1,342.50
B320	12/28/24	JDP	Review draft of Debtor's tdp and trust agreement	1.70	\$1,963.50
B320	12/29/24	BIW	Further revise Committee Solicitation Letter	0.90	\$877.50
B320	12/29/24	BIW	Draft email to counsel for OPF and Adventus re: service of complaint and OPF claim objection	0.20	\$195.00
B320	12/29/24	BIW	Review Trust Agreement and Trust Distribution Protocols	0.40	\$390.00
B320	12/29/24	BIW	Revise Committee Solicitation Letter	0.40	\$390.00
B320	12/29/24	CF	Review trust documents; call with B. Weisenberg re: same	0.30	\$154.50
B320	12/30/24	JDP	Review and edit committee solicitation letter	2.20	\$2,541.00
B320	12/30/24	JDP	Review, analyze and comment on draft tdp	2.60	\$3,003.00
Total B320 - Plan and Disclosure Statement (including Business Plan)				314.10	\$278,012.50

B400 - Bankruptcy-Related Advice

B430 Adversary Proceedings and Bankruptcy Court Litigation

B430	10/01/24	BIW	Review draft Motion to Intervene in American Home action (.2); draft email to T. Burns re: same (.1)	0.30	\$292.50
B430	10/01/24	BIW	Review Continental's letter to Debtor re: Insurance discovery disputes	0.40	\$390.00
B430	10/02/24	BIW	Draft email to T. Burns re: summary of conference before Judge Corley	0.20	\$195.00
B430	10/08/24	BIW	Review Insurers' email re: filing of motions to dismiss Fifth Amended Complaint (.2); draft email re: same (.2)	0.40	\$390.00
B430	10/10/24	DC	Review Pretrial Order No. 3, update critical dates memo and attorney calendar with all deadlines in the USDC, Case No. 24-00709	0.40	\$136.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	10/10/24	JDP	Prepare for (.2) and participate in (.5) meet and confer with insurers re: 5th amended complaint	0.70	\$808.50
B430	10/11/24	BIW	Review Status Conference Statement filed by Debtor and Insurers	0.40	\$390.00
B430	10/31/24	CF	Review 9th Circuit cases re: committee derivative standing	0.40	\$206.00
B430	11/01/24	BIW	Review caselaw on standing and assets of estate	0.70	\$682.50
B430	11/02/24	BIW	Review pleadings requesting alternative methods of resolving disputes among parties in interest	0.70	\$682.50
B430	11/03/24	BIW	Review pleadings and caselaw on alternative methods of resolving mediation stalemates and devise strategy re: same	3.70	\$3,607.50
B430	11/04/24	DC	Review docket, update critical dates memo and attorney calendar	0.40	\$136.00
B430	11/04/24	JDP	Review legal memos re: litigation alternatives and develop strategy	1.50	\$1,732.50
B430	11/05/24	BIW	Review research on issues re: recovery of assets of estate, standing and substantive consolidation	1.10	\$1,072.50
B430	11/05/24	JDP	Develop litigation strategy	1.50	\$1,732.50
B430	11/06/24	BIW	Prepare for (.4) and participate in call with J. Prol and N. Fulfree re: litigation strategy (.8); draft email re: same (.2)	1.40	\$1,365.00
B430	11/06/24	BIW	Revise complaints	1.70	\$1,657.50
B430	11/06/24	BIW	Review case law on scope and extent of automatic stay	0.70	\$682.50
B430	11/06/24	BIW	Review and revise complaints	2.20	\$2,145.00
B430	11/06/24	BMC	Prepare for (.6) and participate in call with J. Prol, B. Weisenberg and N. Fulfree re: litigation strategy (.8); confer with N. Fulfree re: same (.5); compile research re: same and email to N. Fulfree (.2); confer with B. Weisenberg re: automatic stay research (.1); compile research re: same and email to B. Weisenberg (.3)	2.50	\$1,362.50
B430	11/06/24	JDP	Develop litigation strategy	2.20	\$2,541.00
B430	11/06/24	JDP	Call with litigation team re: litigation strategy	0.80	\$924.00
B430	11/06/24	NF	Introductory team call (.8); review of template standing motion and discuss same with B. Clark (.5); start reviewing mediation decks (.6); follow up call with B. Weisenberg re: same (.1)	2.00	\$2,080.00
B430	11/07/24	BMC	Email N. Fulfree re: standing motion	0.10	\$54.50
B430	11/07/24	EGM	Call with B. Weisenberg to discuss litigation strategy (.1); review draft complaints and notes regarding strategy of same (.4)	0.50	\$410.00
B430	11/07/24	JDP	Develop claims and causes of action vs parishes and bond obligated group	3.20	\$3,696.00
B430	11/07/24	MAK	Confer with N. Fulfree re: avoidance claims	0.60	\$573.00
B430	11/07/24	NF	Review presentation decks and other introductory case materials to prepare for drafting complaint (3.9); meet with M. Kaplan to discuss case background (.6); review RCBO standing motion and share same with B. Clark (.4)	4.90	\$5,096.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	11/08/24	BMC	Call with N. Fulfree re: standing motion (.3); conduct research re: same (.8)	1.10	\$599.50
B430	11/08/24	CF	Call with N. Fulfree re: case strategy	0.20	\$103.00
B430	11/08/24	JDP	Call with LS team and BRG re: facts underlying claims vs bond obligated group and parishes	1.10	\$1,270.50
B430	11/08/24	JDP	Develop factual and legal theories for claims vs bond obligated group and parishes	2.50	\$2,887.50
B430	11/08/24	NF	Continued review of decks and background (2.3); Call with C. Frankel re: subcon arguments (.3); call with BRG and LS re: complaints (1.1) and follow up call with solely LS (.2) re: same; review OPF complaint and draft standing motion to prepare for standing motion prep call (.5); call with B. Clark re: standing motion (.3); initial review of OPF complaint and email J. Prol and B. Weisenberg re: thoughts (.9); discuss demand futility with M. Kaplan (.1)	5.70	\$5,928.00
B430	11/09/24	BIW	Draft email to N. Fulfree re: complaint against Churches	0.20	\$195.00
B430	11/09/24	NF	Review of documents including brief attention to plan and DS as relevant to standing motion and complaint and continue review of documents and two complaints and provide comments re: same	2.40	\$2,496.00
B430	11/10/24	MAK	Telephone call with B. Weisenberg re: litigation strategy	0.80	\$764.00
B430	11/11/24	BIW	Revise complaints (.6); call with LS team re: same (.6)	1.20	\$1,170.00
B430	11/11/24	BIW	Revise Parish and OPF complaints (.5); confer with LS team re: same (.6)	1.10	\$1,072.50
B430	11/11/24	BIW	Review research on CA law on unincorporated associations and divisions	0.70	\$682.50
B430	11/11/24	BIW	Draft inserts to Standing Motion	0.60	\$585.00
B430	11/11/24	BMC	Continue drafting standing motion (3.3); research re: standing and certain causes of action (2.7); confer with N. Fulfree re: same (.7)	6.70	\$3,651.50
B430	11/11/24	CTH	Research re: cost benefit analysis in motions for standing	0.60	\$207.00
B430	11/11/24	JDP	Confer with LS team re: litigation strategy	0.60	\$693.00
B430	11/11/24	JDP	E-mails from/to LS team re: comments on complaints and strategy issues	1.60	\$1,848.00
B430	11/11/24	NF	Call with B. Clark re: complaints and standing motion (.7); Call with J. Prol, B. Clark, and B. Weisenberg re: complaints (.6); call with M. Kaplan re: litigation budget (.2); review subcon/derivative standing issues and discuss same with C. Frankel (.7); multiple emails with B. Weisenberg and other team members re: complaint status and comments (.5); discussions with B. Clark re: complaint structure and unincorporated associations/divisions issue and review of sample complaints re: same (.7); additional emails re: standing motion declaration and budget (.3); Start reviewing primary source documents from BRG to start drafting complaint (1.8)	5.40	\$5,616.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	11/12/24	BMC	Conduct Ninth Circuit research re: standing (1.2); emails/discussions with BRG and LS teams re: certain facts from the Committee's investigation for the standing motion and complaints (.7); continue drafting standing motion (3.9)	5.80	\$3,161.00
B430	11/12/24	BMC	Calls with N. Fulfree re: standing motion and complaints	0.50	\$272.50
B430	11/12/24	BMC	Call with C. Frankel re: standing motion and complaints	0.30	\$163.50
B430	11/12/24	CF	Call with B. Clark re: standing motion	0.30	\$154.50
B430	11/12/24	CG	Strategize with local California counsel on lift stay motion re ninth circuit law	0.10	\$55.00
B430	11/12/24	JDP	Review and edit draft Parish complaint	1.20	\$1,386.00
B430	11/12/24	JDP	Develop strategy re: avoidance claims	2.20	\$2,541.00
B430	11/12/24	MAK	Review asset analyses and legal research re: property of the estate	2.90	\$2,769.50
B430	11/12/24	NF	Continue review of primary documents and draft complaint (1.8); calls with B. Clark re: standing motion and related documents (.5); review litigation budgets from previous cases and email M. Makarovsky re: drafting cost/benefit budget for standing motion (.4); review and respond to team emails (.4); research on various claims and whether derivative standing is required (.8)	3.90	\$4,056.00
B430	11/13/24	BIW	Confer with Lowenstein Team re: potential causes of action (1.9); follow-up call re: same (.7)	2.60	\$2,535.00
B430	11/13/24	BIW	Revise complaints and Standing Motion	1.20	\$1,170.00
B430	11/13/24	CF	Confer with N. Fulfree re: standing motion (.2); draft complaint against diocese and churches (1)	1.20	\$618.00
B430	11/13/24	CF	Draft demand letter to Debtor (1.4); review and revise draft standing motion (1.1)	2.50	\$1,287.50
B430	11/13/24	JDP	Confer with LS litigation team re: litigation strategy	1.90	\$2,194.50
B430	11/13/24	JDP	Follow-up call with LS team re: litigation strategy	0.70	\$808.50
B430	11/13/24	MAK	Confer with LS team re: potential adversary complaints	1.90	\$1,814.50
B430	11/13/24	NF	Call with J. Prol and B. Weisenberg to strategize re: complaints and standing (1.9); follow-up call with Lowenstein team regarding potential complaints (.7); review demand letter and provide comments to same (.2); discuss standing motion with C. Frankel (.2); review and edit demand letter (.8); continue revising complaints (1.7)	5.50	\$5,720.00
B430	11/14/24	BIW	Confer with J. Prol and Team re: outline of filings in response to Debtor's Plan	0.50	\$487.50
B430	11/14/24	BIW	Review and revise Demand Letter re: Standing	0.30	\$292.50
B430	11/14/24	BIW	Revise Standing Motion	2.70	\$2,632.50
B430	11/14/24	BIW	Continue drafting Standing Motion	1.30	\$1,267.50
B430	11/14/24	BIW	Continue drafting Standing Motion	2.10	\$2,047.50
B430	11/14/24	BMC	Confer with N. Fulfree and B. Weisenberg re: standing motion and complaints	0.20	\$109.00
B430	11/14/24	CF	Revise demand letter	0.30	\$154.50
B430	11/14/24	CF	Revise demand letter	0.20	\$103.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	11/14/24	JDP	Confer with LS team re: status and strategy on complaints	0.50	\$577.50
B430	11/14/24	JDP	Review materials re: bond obligated group allegations (.3); participate in call with BRG re: same (.5)	0.80	\$924.00
B430	11/14/24	NF	Discussions with B. Weisenberg (.2) and C. Frankel re: workstreams (.2); call with team re: complaints and outstanding items (.5); call with BRG re: standing motion (.5); review and respond to emails from BRG re: standing motion (.2); review judicial estoppel memo and emails with team re: same (.3); email associates to request assistance on complaints (.2); review standing demand letter (.3); review BRG emails re: standing motion issues (.3); Multiple team emails re strategy (.4); continued review of revision of complaints (3.9)	7.00	\$7,280.00
B430	11/15/24	BIW	Continue drafting Standing Motion	1.10	\$1,072.50
B430	11/15/24	BIW	Confer with J. Prol and Team re: outline filings in response to Debtor's Plan	0.50	\$487.50
B430	11/15/24	BIW	Revise Standing Motion	2.40	\$2,340.00
B430	11/15/24	BIW	Review case law cited in Standing Motion	0.90	\$877.50
B430	11/15/24	CF	Combine complaints against churches and OPF	1.70	\$875.50
B430	11/15/24	CF	Adversary proceeding strategy call with M. Babcock and N. Fulfree	0.50	\$257.50
B430	11/15/24	DC	Prepare list of parishes for adversary complaint	0.30	\$102.00
B430	11/15/24	JDP	Confer with litigation team re: status of pleadings and strategy	0.50	\$577.50
B430	11/15/24	MAK	Review and analyze research and analysis, along with discovery produced re: property of the estate	3.60	\$3,438.00
B430	11/15/24	MAK	Telephone call with committee professionals re: potential adversary complaints	0.50	\$477.50
B430	11/15/24	NF	Review and revise OPF Complaint (7.0) and discuss Parishes complaint with BRG and C. Frankel (.5); confer with Lowenstein team re: workstreams (.5); call with C. Frankel re: complaints (.5)	8.50	\$8,840.00
B430	11/16/24	BIW	Confer with counsel for Debtor re: property of estate dispute	0.50	\$487.50
B430	11/16/24	BIW	Revise Standing Motion	1.20	\$1,170.00
B430	11/16/24	BIW	Revise Standing Motion	0.60	\$585.00
B430	11/16/24	BIW	Confer with BRG re: causes of action against OPF	0.80	\$780.00
B430	11/16/24	CF	Combine Parish and OPF complaints	7.10	\$3,656.50
B430	11/16/24	CG	Incorporate comments received from committee professionals into standing motion (1.9); review and analyze ninth circuit and other diocese decisions and incorporate into motion (3.9)	5.80	\$3,190.00
B430	11/16/24	JDP	Review and edit motion for standing	3.20	\$3,696.00
B430	11/16/24	JDP	Review and edit draft complaints	1.70	\$1,963.50
B430	11/16/24	MAK	Conference call with debtor's counsel re: standing letter	0.50	\$477.50
B430	11/16/24	MAK	Review, analyze and comment on draft motion to lift the automatic stay	1.40	\$1,337.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	11/16/24	NF	Continued review and revision of OPF complaint and emails with team re: same (1.5) Attend standing letter call with Debtors' counsel (.5); review C. Frankel edits to Parishes complaint and provide comments re same and discuss with C. Frankel (.7); initial review of standing motion (.6); call with BRG re: complaints (.8); review standing stipulation (.2); attention to OPF/Parish complaints and edits to same (1.8); brief review of disclosure statement for purposes of complaints (.6)	6.70	\$6,968.00
B430	11/17/24	BIW	Confer with BRG re: causes of action against OPF	0.70	\$682.50
B430	11/17/24	BIW	Revise Standing Motion	1.30	\$1,267.50
B430	11/17/24	MAK	Review, analyze and comment on draft motion for derivative standing	1.80	\$1,719.00
B430	11/17/24	NF	Attend call with BRG re: complaints (.7); continued review and revision of standing motion (1.8); attention to OPF/Parishes complaint (1.3)	3.80	\$3,952.00
B430	11/18/24	BIW	Revise Lift Stay Motion	5.10	\$4,972.50
B430	11/18/24	BIW	Revise Complaint and Standing Motion	1.10	\$1,072.50
B430	11/18/24	CF	Finalize combined adversary complaint	8.80	\$4,532.00
B430	11/18/24	CG	Perform citation checks and blue booking on standing motion in preparation for filing	4.00	\$2,200.00
B430	11/18/24	JDP	Review and edit motion for standing	2.20	\$2,541.00
B430	11/18/24	JDP	Confer with LS team re: litigation strategy	0.50	\$577.50
B430	11/18/24	JDP	Review and edit OPF complaint and motion for standing	3.60	\$4,158.00
B430	11/18/24	MAK	Review and analyze revisions to Motion to Lift Automatic Stay (.4); review research and analysis on pleading standard for unincorporated entities (1.3); confer with N. Fulfree re: the same (.4); review and analyze revised motion for standing (.7)	2.80	\$2,674.00
B430	11/18/24	NF	Confer with Lowenstein team re: workstreams (.5); correspondence with M. Kaplan re: Parishes/OPF complaint and draft language re: same (.4); emails re: sealing and page limitation issues (.2); review lift stay motion (.6); continued review and revision of combined complaint (4.9)	6.60	\$6,864.00
B430	11/18/24	NSM	Research John Doe filings in 9th Circuit	2.70	\$1,593.00
B430	11/19/24	BIW	Review and revise Complaint	0.80	\$780.00
B430	11/19/24	CF	Incorporate BRG comments into combined complaint (1.4); review complaints with N. Fulfree (.9)	2.30	\$1,184.50
B430	11/19/24	CF	Revise adversary complaint	0.80	\$412.00
B430	11/19/24	CG	Research re: California statutes on fraudulent transfer	0.80	\$440.00
B430	11/19/24	CG	Strategize with B. Weisenberg re: liquidation analysis	0.60	\$330.00
B430	11/19/24	CG	Review comments from M. Kaplan on standing motion draft and incorporate same	2.90	\$1,595.00
B430	11/19/24	JDP	Review and edit OPF complaint	2.80	\$3,234.00
B430	11/19/24	MAK	Review and revise draft motion to lift stay (.8); review and revise draft motion for derivative standing (.6); review and revise Parish adversary complaint (1.9)	3.30	\$3,151.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	11/19/24	NF	Revise complaints and standing motion (9.0); confer with C. Frankel re: complaints (.9)	9.90	\$10,296.00
B430	11/19/24	NSM	Research John Doe filings in 9th Circuit (1.7); draft memo re: same (1.4)	3.10	\$1,829.00
B430	11/20/24	BIW	Review and revise Complaint	1.40	\$1,365.00
B430	11/20/24	BIW	Attention to filing Lift Stay Motion, Standing Motion and Complaint	0.90	\$877.50
B430	11/20/24	CF	Finalize standing motion and complaints for filing	3.50	\$1,802.50
B430	11/20/24	CF	Finalize derivative adversary complaint and non-derivative claims complaint	2.40	\$1,236.00
B430	11/20/24	CG	Research re: property of the estate	2.90	\$1,595.00
B430	11/20/24	EBL	Redact confidential information from complaint and standing motion	2.20	\$759.00
B430	11/20/24	JDP	Review and comment on revised draft of OPF complaint	1.50	\$1,732.50
B430	11/20/24	JDP	Review declarations and exhibits in support of motions and complaints	1.80	\$2,079.00
B430	11/20/24	JDP	Confer with LS and KBK teams re: formatting for filings	0.50	\$577.50
B430	11/20/24	JDP	Review and edit final version of Standing motion	2.40	\$2,772.00
B430	11/20/24	MAK	Review and revise Parish adversary complaint	0.80	\$764.00
B430	11/20/24	NF	Finalize adversary complaints and standing motion (8.9); confer with LS and KBK teams re: finalizing pleadings (.5)	9.40	\$9,776.00
B430	11/21/24	BIW	Review and edit Bond Obligated Group Complaint	1.20	\$1,170.00
B430	11/21/24	BIW	Draft email to M. Lee in response to request to adjourn hearing on Committee motions	0.30	\$292.50
B430	11/21/24	EJS	Review background and mediation materials in connection with Bond Obligated Group	2.40	\$1,716.00
B430	11/21/24	JDP	Review filed copies of motions for stay relief and standing and complaint	0.50	\$577.50
B430	11/22/24	BIW	Confer with G. Albert re: potential response to Debtor's Adjournment Motion	0.40	\$390.00
B430	11/22/24	BIW	Review Debtor's Motion to Adjourn Committee's Lift Stay and Standing Motion	0.40	\$390.00
B430	11/22/24	CF	Review bond-obligated group complaint	1.00	\$515.00
B430	11/22/24	CG	Research whether committee requires standing motion to proceed in insurance adversary proceeding	5.00	\$2,750.00
B430	11/22/24	EJS	Video call with N. Fulfree re Bond Obligated Group Adversary Complaint (.6); follow-up correspondence with same re issues in connection with Complaint (.1); review Parochial Fund Standing Complaint re causes of action (.3); review documents re Bond Obligated Group (1.8); begin drafting Complaint (4.5)	7.30	\$5,219.50
B430	11/22/24	JDP	Preliminary review of Debtor's motion to adjourn Committee's motions for stay relief and standing	0.30	\$346.50
B430	11/22/24	NF	Prepare notes and documents (.2) for intro call with E. Seltzer re: BOG complaint and attend same (.6); discuss BOG call with C. Frankel (.1)	0.90	\$936.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	11/23/24	BIW	Draft objection to Debtor's Adjournment Motion	3.60	\$3,510.00
B430	11/23/24	BIW	Continue to draft objection to Debtor's Adjournment Motion	2.40	\$2,340.00
B430	11/23/24	EJS	Draft Bond Obligated Group Adversary Complaint	6.40	\$4,576.00
B430	11/23/24	JDP	Review and analyze Debtor's motion to adjourn committee motions for standing and stay relief	0.60	\$693.00
B430	11/24/24	BIW	Continue to draft objection to Debtor's Adjournment Motion	0.70	\$682.50
B430	11/24/24	BIW	Continue to draft objection to Debtor's Adjournment Motion	0.60	\$585.00
B430	11/24/24	EJS	Continue drafting Bond Obligated Group Adversary Complaint	6.20	\$4,433.00
B430	11/25/24	BIW	Continue to draft objection to Debtor's Adjournment Motion	1.40	\$1,365.00
B430	11/25/24	BIW	Confer with BRG re: analysis of Bond Obligated Group	1.30	\$1,267.50
B430	11/25/24	CF	Review Bond-Obligated Group complaint (2.6); confer with E. Seltzer re: same (.2); call with BRG and LS team re: bond-obligated group complaint (1.3)	4.10	\$2,111.50
B430	11/25/24	CG	Review committee's objection to debtor's request to adjourn standing and lift stay motions	0.30	\$165.00
B430	11/25/24	CG	Correspond with B. Weisenberg on research re reply to the debtor's request for an extension of time to answer lift stay and standing motions (.1); review and analyze ninth circuit case law on same (1.3)	1.40	\$770.00
B430	11/25/24	EJS	Continue drafting Bond Obligated Group adversary complaint (4.8); attend call with Lowenstein and BRG teams re same (1.3); prepare for BRG call (.2); email correspondence with C. Frankel re issues in connection with adversary complaint (.2)	6.50	\$4,647.50
B430	11/25/24	JDP	Review and edit response to debtor's motion to adjourn committee's standing and stay relief motions	2.60	\$3,003.00
B430	11/25/24	JDP	Review and edit revised draft of objection to debtor's motion to adjourn committee's standing and stay relief motions	0.90	\$1,039.50
B430	11/25/24	NF	Prepare notes for (.7) and attend (1.3) call with BRG on Bond Obligated Group	2.00	\$2,080.00
B430	11/26/24	CG	Review pleadings related to derivative standing in other diocese bankruptcy cases to prepare for committee reply to debtor's standing motion objection	3.70	\$2,035.00
B430	11/26/24	EJS	Revise BOG Adversary Complaint (5.0); call with N. Fulfree re Adversary Complaint structure and issues (.8)	5.80	\$4,147.00
B430	11/26/24	JDP	Review and edit standing motion	2.20	\$2,541.00
B430	11/26/24	NF	Email to C. Guavin re: prep for standing reply and review materials re: same (.8); call with E. Seltzer re: BOG complaint (.8); review of BOG primary documents to prepare for review of complaint (1.4); brief review of adjournment-related pleadings (.3)	3.30	\$3,432.00
B430	11/27/24	EJS	Revise adversary complaint (1.1); email correspondence with N. Fulfree re same (.2)	1.30	\$929.50
B430	11/27/24	NF	Review BOG complaint	2.80	\$2,912.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	11/29/24	BIW	Review Bond Obligated Group exhibits	1.30	\$1,267.50
B430	11/29/24	CF	Review supporting documents and document production related to Bond-Obligated Group Complaint	1.70	\$875.50
B430	11/29/24	EJS	Create database of sources referenced in adversary complaint (.4); correspondence with C. Frankel re same (.1)	0.50	\$357.50
B430	11/29/24	MAK	Review and analyze draft adversary complaint re: BOG	1.90	\$1,814.50
B430	11/29/24	NF	Review comments and other edits to BOG complaint	1.20	\$1,248.00
B430	11/30/24	BIW	Review and comment on Bond Obligated Group complaint	1.10	\$1,072.50
B430	11/30/24	CF	Meeting with E. Seltzer to review and revise bond-obligated group complaint	3.20	\$1,648.00
B430	11/30/24	EJS	Meeting with C. Frankel to review and revise Bond Obligated Group Adversary Complaint (3.2); email correspondence with J. Prol, B. Weisenberg, and C. Frankel re same (.3)	3.50	\$2,502.50
B430	11/30/24	JDP	Review and edit OPF complaint	1.40	\$1,617.00
B430	12/01/24	CF	Revise bond-obligated group complaint	1.20	\$618.00
B430	12/01/24	EJS	Revise Bond Obligated Group Adversary Complaint (2.4); email correspondence with C. Frankel re: same (.2)	2.60	\$1,859.00
B430	12/02/24	BIW	Confer with C. Frankel re: Bond Obligated Group complaint strategy	0.40	\$390.00
B430	12/02/24	BIW	Review and comment on Bond Obligated Group complaint	0.90	\$877.50
B430	12/02/24	CF	Call with E. Seltzer re: revisions to bond obligated group complaint	1.20	\$618.00
B430	12/02/24	CF	Email communications re: bond obligated group complaint	0.50	\$257.50
B430	12/02/24	CF	Revise BOG complaint (.2); Call with B. Weisenberg and M. Babcock re: same (.4); calls (2x) with N. Fulfree re: same (.3)	1.10	\$566.50
B430	12/02/24	EJS	Further revise Bond Obligated Group Adversary Complaint (1.7); call with C. Frankel re updates in connection with same (.3); email correspondence with C. Frankel re same (.1)	2.10	\$1,501.50
B430	12/02/24	NF	Calls with C. Frankel re: BOG complaint (.3); review of edits to complaint (2.2)	2.50	\$2,600.00
B430	12/03/24	BIW	Confer with BRG re: Bond Obligated Group complaint	0.50	\$487.50
B430	12/03/24	BIW	Confer with E. Seltzer re: changes to BOG Complaint	0.40	\$390.00
B430	12/03/24	BIW	Comment on Bond Obligated Group complaint	1.20	\$1,170.00
B430	12/03/24	CF	Draft Oakland Parochial Group claim objection	0.80	\$412.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	12/03/24	EJS	Review and comment on draft Disclosure Statement Objection (.9); discuss adversary proceeding strategy with B. Weisenberg (.4); email correspondence with Lowenstein team re open action items in connection with same (.3); call with C. Frankel re OPF claim objection and unknown claimant class composition (.3); meet with C. Frankel and C. Gauvin re artificial impairment background and research (.5); further revise Bond Obligated Group Adversary Complaint (2.9); call (.5) and email correspondence (.1) with Lowenstein and BRG teams re Disclosure Statement Objection and Bond Obligated Group Adversary Complaint; follow-up correspondence with same re scheduling (.1)	6.00	\$4,290.00
B430	12/03/24	JJP	Confer with B. Weisenberg and order transcripts as requested	0.30	\$109.50
B430	12/03/24	NF	Call with BRG re: BOG complaint (.5); review notes on BOG complaint to prepare for editing same (.4)	0.90	\$936.00
B430	12/04/24	BIW	Confer with BRG re: proposed modifications to Bond Obligated Group complaint	0.60	\$585.00
B430	12/04/24	BIW	Review and revise Bond Obligated Group complaint	0.90	\$877.50
B430	12/04/24	CF	Revise bond obligated group complaint	2.40	\$1,236.00
B430	12/04/24	EJS	Draft preliminary statement for Bond Obligated Group Adversary complaint (1.0); revise adversary complaint (1.7); email correspondence with B. Weisenberg re multiple questions regarding same (.4); prepare for (.1) and attend (.6) call with Lowenstein and BRG teams re Bond Obligated Group Adversary Complaint; follow-up correspondence with B. Weisenberg re same (.1); call with C. Frankel re revised adversary complaint (1.2); further revise Adversary Complaint (.8); research Ninth Circuit standard for insider transactions in connection with Disclosure Statement Objection (.9); call with B. Weisenberg re same (.1); draft summary of findings (.3); review pertinent case law and articles re artificial impairment in the Ninth Circuit (.8); email correspondence with C. Gauvin analysis and next steps in connection with same (.3)	8.30	\$5,934.50
B430	12/04/24	JDP	Review and revise draft BOG complaint	2.30	\$2,656.50
B430	12/04/24	JJP	Download and transfer transcription files requested by B. Weisenberg; locate and provide documents requested by B. Weisenberg	0.30	\$109.50
B430	12/04/24	NF	Call with BRG re: BOG complaint (.6) and multiple emails re: same (.8)	1.40	\$1,456.00
B430	12/05/24	BIW	Revise Bond Obligated Group Complaint (.7); call LS team re: same (1.1)	1.80	\$1,755.00
B430	12/05/24	BIW	Revise Bond Obligated Group complaint	2.40	\$2,340.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	12/05/24	EJS	Call with B. Weisenberg re Bond Obligated Group Adversary Complaint (.2); revise same (.7); prepare for (.2) and attend (1.1) call with B. Weisenberg and N. Fulfree re: Adversary Complaint; follow-up call with N. Fulfree re: same (.2); further revise Adversary Complaint (.6); email correspondence with Lowenstein team re: issues in connection with same (.2); review revised Disclosure Statement Objection (.3); review artificial impairment research from C. Gauvin (.7); comment on same (.3); call (.2) and email correspondence (.1) with C. Gauvin re: artificial impairment issues	4.80	\$3,432.00
B430	12/05/24	NF	Call with LS team re: BOG complaint (1.1); review and revise latest version of complaint (1.5)	2.60	\$2,704.00
B430	12/06/24	BIW	Review revised Bond Obligated Group Complaint	0.90	\$877.50
B430	12/06/24	CF	Call with BRG and internal re: bond obligated group complaint (1); call with B. Weisenberg, N. Fulfree and E. Seltzer re: bond obligated group complaint (1)	2.00	\$1,030.00
B430	12/06/24	EJS	Email correspondence with B. Weisenberg re OPF Bylaws (.1); review BRG comments to Bond Obligated Group Adversary Complaint (.4); review N. Fulfree comments to Adversary Complaint (.1); call with N. Fulfree re: same (.2); further revise Adversary Complaint re BRG comments and internal comments (2.1); follow-up email correspondence with Lowenstein team re same (.2); call with C. Gauvin re: artificial impairment research findings (.2); review additional findings re same (.1); call with B. Weisenberg re: same and Disclosure Statement Objection (.1)	3.50	\$2,502.50
B430	12/06/24	NF	Review and revise BOG complaint (3.3); discuss artificial impairment research with E. Seltzer and review case re: same (.4); attention to equitable subordination issues with (.8)	4.50	\$4,680.00
B430	12/07/24	BIW	Review revised Bond Obligated Group Complaint	0.80	\$780.00
B430	12/07/24	EJS	Correspondence with B. Weisenberg and N. Fulfree re: Adversary Complaint	0.20	\$143.00
B430	12/07/24	MAK	Review and revise draft adversary complaint	1.20	\$1,146.00
B430	12/08/24	BIW	Revise Bond Obligated Group Complaint	1.40	\$1,365.00
B430	12/08/24	EJS	Email correspondence with N. Fulfree and B. Weisenberg re: Bond Obligated Group Complaint (.3); revise Complaint (.6)	0.90	\$643.50
B430	12/08/24	MAK	Telephone call with B. Weisenberg re: adversary complaint	0.20	\$191.00
B430	12/08/24	NF	Review revised BOG complaint and discuss same with E. Seltzer	1.30	\$1,352.00
B430	12/09/24	BIW	Revise Bond Obligated Group Complaint	1.90	\$1,852.50
B430	12/09/24	BIW	Confer with Bond Obligated Group Complaint Team re: revised Complaint	1.00	\$975.00
B430	12/09/24	BIW	Confer with BRG re: Bond Obligated Group Complaint	1.00	\$975.00
B430	12/09/24	CD	Draft plan confirmation discovery	2.00	\$1,200.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	12/09/24	EJS	Call with B. Weisenberg and N. Fulfree re: Bond Obligated Group Adversary Complaint (1.0); call with BRG and Lowenstein teams re same (1.0); further revise Adversary Complaint (3.3); follow-up call with N. Fulfree re revisions to Complaint (.1); follow-up call with B. Weisenberg re same (.2); email correspondence with Lowenstein team re adversary proceedings (.2)	5.80	\$4,147.00
B430	12/09/24	NF	Review pro hacs and email with D. Claussen re: same (.2); further review of revised BOG complaint (1.8); attend call with LS team re: BOG complaint (1.0); call with BRG re: BOG complaint (1.0); attention to claim objection and discussions with C. Frankel re: same (.8); review bond indenture documents and draft email with additional proposed language for BOG complaint (.8); review OPF claim objection and input edits and revise (1.8)	7.40	\$7,696.00
B430	12/10/24	BIW	Review proposed final Bond Obligated Group Complaint	0.90	\$877.50
B430	12/10/24	CD	Draft plan confirmation discovery	0.90	\$540.00
B430	12/10/24	EJS	Revise Bond Obligated Group Adversary Complaint (2.5); call with B. Weisenberg re same (.1); email correspondence with Lowenstein team re same (.2); email correspondence with G. Albert (Keller) re filing of Complaint (.1); prepare cover page for complaint (.5); correspondence with P. Shields (BRG) re additional edits to Complaint (.1)	3.50	\$2,502.50
B430	12/10/24	JDP	Final review of BOG complaint	1.20	\$1,386.00
B430	12/10/24	NF	Call with B. Weisenberg re: claim objection (.2); call with E. Seltzer re: BOG complaint (.1); attention to claim objection (2.4); call with C. Frankel re: claim objection (.2); review BRG final edits to BOG complaint (.3); review adversary proceeding cover sheet and email E. Seltzer re: same (.2); review of BOG documents in connection with final review of BOG complaint (.8)	4.20	\$4,368.00
B430	12/11/24	BIW	Review and comment on Bond Obligated Complaint	0.60	\$585.00
B430	12/11/24	EJS	Further revise Bond Obligated Group Adversary Complaint (1.5); prepare redacted version of same (2.2); correspondence with N. Fulfree re redactions (.1); email correspondence with P. Shields re Complaint (.2); prepare filing versions of redacted and un-redacted Complaint (.5); email correspondence with B. Weisenberg re same (.1); coordinate filing of same with G. Albert (.2)	4.80	\$3,432.00
B430	12/11/24	JDP	Review and comment on final version of bond obligated group complaint	1.40	\$1,617.00
B430	12/11/24	MAK	Review and revise draft adversary complaint	0.30	\$286.50
B430	12/11/24	NF	Continued review and revision of OPF Claim objection (5.5); call with B. Weisenberg and C. Frankel re: same (.2); attention to BOG complaint redactions (.8); call with C. Frankel re: finalizing documents (.7); emails with G. Albert re: same (.2); final review of objection and notice (1.5)	8.90	\$9,256.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	12/12/24	EJS	Email correspondence with BRG re issue in connection with Adversary Complaint (.2); attend to additional adversary proceeding issues with Lowenstein team (.8)	1.00	\$715.00
B430	12/12/24	JDP	Review and comment on insurance dec relief standing motion	1.20	\$1,386.00
B430	12/12/24	NF	Review emails from BRG and others and discuss BOG complaint issues with E. Seltzer	0.40	\$416.00
B430	12/13/24	DC	Review dockets in committee adversary proceedings, update files with discovery order deadlines, critical dates memo and attorney calendar	0.60	\$204.00
B430	12/14/24	JDP	Review and comment on motion for standing to pursue insurance adversary proceeding	1.30	\$1,501.50
B430	12/19/24	CD	Draft plan confirmation discovery	0.90	\$540.00
B430	12/20/24	BIW	Draft email to Litigation Team re: proposed scheduling for adversary proceedings	0.20	\$195.00
B430	12/20/24	JDP	Call with Debtor's counsel re: scheduling and return to mediation	0.70	\$808.50
B430	12/21/24	BIW	Draft email to Litigation Team re: service of complaints	0.30	\$292.50
B430	12/23/24	BIW	Draft email to Foley Team re: service of complaints and response deadline	0.30	\$292.50
B430	12/23/24	CMR	Review summary of adversary proceedings	0.30	\$268.50
B430	12/23/24	NF	Draft Notice of Lawsuit and Waiver of Summons (.9) and stipulation and order extending answer deadline (.8); email with G. Albert re: same (.1); Email B. Weisenberg re: same (.2)	2.00	\$2,080.00
B430	12/26/24	BIW	Draft email to Foley re: service of complaints	0.20	\$195.00
B430	12/27/24	NF	Attention to service and summons issues for two adversary complaints (1.2); discussions with M. Kaplan (.2) G. Albert (.1); and B. Weisenberg re: same (.2)	1.70	\$1,768.00
B430	12/29/24	BIW	Draft email to defendants in Committee adversary proceedings re: acceptance of service and response deadline	0.20	\$195.00
B430	12/30/24	NF	Draft extension stip and order for BOG complaint (.8); draft extension stip and order for OPF complaint (.2); email Lowenstein team re: proposed deadlines (.2); minor revisions to same and email defendants counsel re: same (.2)	1.40	\$1,456.00
B430	12/31/24	BIW	Review objection to Standing Motion	0.60	\$585.00
B430	12/31/24	CF	Review objections and oppositions to the Committee's standing and lift stay motions (1.1) and begin drafting reply (1.1)	2.20	\$1,133.00
B430	12/31/24	JDP	Review and analyze responses to lift stay motion (2.20); confer with LS team re: same (.7)	2.90	\$3,349.50
B430	12/31/24	JDP	Review and analyze responses to motion for standing (1.9); confer with LS team re: same (.4)	2.30	\$2,656.50
B430	12/31/24	MAK	Review and analyze opposition briefs to UCC Lift Stay Motion	2.90	\$2,769.50
B430	12/31/24	MAK	Review and analyze opposition briefs to UCC Derivative Standing Motion	1.90	\$1,814.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	12/31/24	NF	Review standing objection and begin drafting reply	8.40	\$8,736.00
Total B430 - Adversary Proceedings and Bankruptcy Court Litigation				513.30	\$448,346.50
<u>B430A Court Hearings</u>					
B430A	10/02/24	BIW	Appear before District Court re: Insurer Adversary Proceeding Conference	0.50	\$487.50
B430A	10/13/24	BIW	Prepare for hearing on Survivor Statement Motion	0.40	\$390.00
B430A	10/14/24	BIW	Prepare for hearing on Survivor Statement Motion	0.90	\$877.50
B430A	10/15/24	BIW	Prepare for (.7) and attend (1.5) RCBO Status Conference and hearing on Survivor Statement Motion	2.20	\$2,145.00
B430A	10/15/24	BIW	Prepare for Status Conference and hearing on Survivor Statement Motion	1.80	\$1,755.00
B430A	10/15/24	JDP	Participate in hearing on motion to schedule conference for survivor statements and status conference	1.50	\$1,732.50
B430A	10/22/24	BIW	Prepare for Survivor Statement hearing by reviewing cited cases and reviewing legal research	1.40	\$1,365.00
B430A	10/23/24	BIW	Prepare for hearing on Committee's Survivor Statement Motion	1.30	\$1,267.50
B430A	10/24/24	BIW	Attend hearing on Survivor Statement Motion	1.40	\$1,365.00
B430A	10/24/24	BIW	Prepare for hearing on Survivor Statement Motion	1.10	\$1,072.50
B430A	10/24/24	JDP	Prepare for (.5) and participate in (1.4) hearing on hearing on committee motion to allow survivor statements	1.90	\$2,194.50
B430A	10/26/24	BIW	Prepare for Survivor Status Conferences	0.60	\$585.00
B430A	10/26/24	CF	Review October 24 hearing recording	0.30	\$154.50
B430A	11/01/24	BIW	Confer with G. Albert re: coordination of Survivor Statement Conference	0.50	\$487.50
B430A	11/01/24	BIW	Confer with Survivor Speaker to prepare for 11/4/24 Survivor Speaker Conference	0.60	\$585.00
B430A	11/01/24	BIW	Confer with counsel for Debtor re: Survivor Status Conference procedures	0.30	\$292.50
B430A	11/01/24	BIW	Confer with Survivor Speaker to prepare for 11/4/24 Survivor Speaker Conference	0.80	\$780.00
B430A	11/01/24	BIW	Confer with Survivor Speaker to prepare for 11/4/24 Survivor Speaker Conference	0.80	\$780.00
B430A	11/01/24	JDP	Review survivor poc's to prepare for survivor statement conference	1.50	\$1,732.50
B430A	11/02/24	BIW	Confer with Survivor Speaker to prepare for 11/4/24 Survivor Speaker Conference	1.20	\$1,170.00
B430A	11/04/24	BIW	Attend Survivor Statement Conference	2.10	\$2,047.50
B430A	11/04/24	JDP	Attend survivor statement hearing	2.10	\$2,425.50
B430A	11/26/24	JDP	Prepare for (.2) and participate in (.4) status conference before Judge Corley	0.60	\$693.00
B430A	11/27/24	BIW	Attend hearing on Debtor's Adjournment Motion	1.20	\$1,170.00
B430A	11/27/24	BIW	Prepare for Motion to Adjourn Hearing	0.90	\$877.50
B430A	11/27/24	BIW	Prepare for hearing on Debtors' motion to adjourn committee motions	1.10	\$1,072.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430A	11/27/24	JDP	Prepare for and participate in status conference before Judge Corley on insurance adversary proceeding	1.20	\$1,386.00
B430A	11/27/24	JDP	Attend hearing on Debtor's Adjournment Motion	1.20	\$1,386.00
B430A	11/27/24	JDP	Prepare for (.3) and participate in (1.2) hearing on Debtor's motion to adjourn committee stay relief and standing motions	1.50	\$1,732.50
B430A	12/02/24	BIW	Prepare for Survivor Statement Conference	0.60	\$585.00
B430A	12/04/24	BIW	Confer with Survivor and her counsel re: prepare for Survivor Statement Conference	1.00	\$975.00
B430A	12/05/24	BIW	Confer with Survivor and her counsel to prepare for Survivor Statement Conference	0.80	\$780.00
B430A	12/06/24	BIW	Confer with Survivor and her counsel to prepare for Survivor Statement Conference	0.90	\$877.50
B430A	12/06/24	BIW	Confer with Survivor and her counsel to prepare for Survivor Statement Conference	0.60	\$585.00
B430A	12/09/24	BIW	Confer with Survivor and his counsel to prepare for Survivor Statement Conference	0.90	\$877.50
B430A	12/09/24	BIW	Confer with counsel for Committee member re: preparation for Survivor Statement Conference	0.60	\$585.00
B430A	12/09/24	BIW	Review proofs of claim filed by Survivors speaking at Survivor Conference	0.80	\$780.00
B430A	12/09/24	BIW	Confer with Survivor and his counsel to prepare for Survivor Statement Conference	0.70	\$682.50
B430A	12/09/24	BIW	Confer with Survivor and her counsel to prepare for Survivor Statement Conference	0.90	\$877.50
B430A	12/10/24	BIW	Confer with counsel for Abuse Claimant re: preparation of proof of claim	0.30	\$292.50
B430A	12/10/24	BIW	Confer with Survivor and his counsel re: prepare for Survivor Statement Conference	0.60	\$585.00
B430A	12/11/24	BIW	Attend hearing re: Fourth Interim Fee Applications (RCBO was #17 on calendar)	2.40	\$2,340.00
B430A	12/11/24	BIW	Confer with counsel for Debtor re: preparation for Survivor Statement Conference	0.20	\$195.00
B430A	12/12/24	BIW	Confer with Survivor speaker to prepare for following day's conference	0.70	\$682.50
B430A	12/13/24	BIW	Attend Survivor Status Conference	3.40	\$3,315.00
B430A	12/13/24	BIW	Prepare for Survivor Status Conference by meeting with Survivors	1.60	\$1,560.00
B430A	12/13/24	BIW	Debrief after Survivor Status Conference by meeting with Survivors	2.10	\$2,047.50
B430A	12/13/24	EJS	Assist with preparation for Disclosure Statement Hearing	0.30	\$214.50
B430A	12/16/24	BIW	Prepare for Disclosure Statement hearing	0.80	\$780.00
B430A	12/16/24	JDP	Prepare for hearing on Disclosure Statement	1.50	\$1,732.50
B430A	12/17/24	BIW	Prepare for Disclosure Statement Hearing by reviewing cited cases, Plan and other pleadings	2.10	\$2,047.50
B430A	12/17/24	BIW	Prepare for Disclosure Statement Hearing by reviewing legal research on adequacy of Disclosure Statement	0.90	\$877.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430A	12/17/24	CF	Assist in preparation of Disclosure Statement hearing	0.70	\$360.50
B430A	12/17/24	CF	Calls (2x) with E. Seltzer re: Disclosure Statement hearing preparation	0.60	\$309.00
B430A	12/17/24	JDP	Review pleadings, plan and disclosure statement to prepare for disclosure statement hearing (3.9); confer with B. Weisenberg re: same (.8)	4.70	\$5,428.50
B430A	12/18/24	BIW	Prepare for Disclosure Statement Hearing	2.90	\$2,827.50
B430A	12/18/24	BIW	Attend Disclosure Statement Hearing	6.50	\$6,337.50
B430A	12/18/24	CF	Research and preparation for Disclosure Statement hearing	3.40	\$1,751.00
B430A	12/18/24	JDP	Attend hearing on adequacy of disclosure statement	6.50	\$7,507.50
B430A	12/20/24	BIW	Begin preparing for Lift Stay hearing	0.80	\$780.00
B430A	12/23/24	BIW	Prepare for Lift Stay hearing	1.40	\$1,365.00
B430A	12/24/24	BIW	Confer with T. Burns re: preparation for Lift Stay hearing	0.40	\$390.00
Total B430A - Court Hearings				85.50	<u>\$85,340.50</u>
<u>B430B Appeals</u>					
B430B	09/05/24	DC	Review appeals docket and update critical dates memo and attorney calendar with case management deadlines	0.40	\$136.00
Total B430B - Appeals				<u>0.40</u>	<u>\$136.00</u>
<u>B460 Other - Insurance Matters</u>					
B460	09/03/24	JDP	Review memo from insurance counsel re: insurance assignments under CA law (.4); review communications from SCC re: same (.2)	0.60	\$693.00
B460	09/13/24	BIW	Review Debtor's Fourth Amended Complaint	0.70	\$682.50
B460	09/16/24	BIW	Review Draft Discovery Plan	0.30	\$292.50
B460	09/17/24	BIW	Review comments to Discovery Plan	0.40	\$390.00
B460	09/24/24	BIW	Review RCBO edits to Discovery Plan	0.40	\$390.00
B460	09/29/24	BIW	Draft emails to T. Burns re: insurance recovery strategy	0.30	\$292.50
B460	09/29/24	BIW	Review and comment on Case Management Report	0.40	\$390.00
B460	09/29/24	BIW	Review Discovery Plan and documents related to same	0.60	\$585.00
B460	09/30/24	BIW	Review Letter to counsel for Debtor from M. Plevin	0.20	\$195.00
B460	09/30/24	BIW	Review Joint Case Management Statement for October 2, 2024	0.70	\$682.50
B460	10/30/24	BIW	Review recent case on Insurer bad faith	0.30	\$292.50
B460	10/31/24	BIW	Draft emails to Foley Team re: request for certain insurance related documents	0.20	\$195.00
B460	11/19/24	BIW	Review email from Debtor's counsel re: request to stay adversary proceeding (.1); draft email re: same (.1)	0.20	\$195.00
B460	11/20/24	BIW	Review motion to stay adversary proceeding	0.40	\$390.00
B460	11/20/24	BIW	Draft emails to T. Burns and J. Bair re: response to Debtor's motion to stay Insurance Adversary Proceeding	0.20	\$195.00
B460	11/21/24	BIW	Confer with Burns Bair re: motion for standing	0.50	\$487.50
B460	11/21/24	JDP	Review and analyze Debtor's motion to stay insurance adversary proceeding	0.40	\$462.00

EXHIBIT G

LOWENSTEIN SANDLER LLP

JEFFREY D. PROL (admitted *pro hac vice*)

jprol@lowenstein.com

BRENT WEISENBERG (admitted *pro hac vice*)

bweisenberg@lowenstein.com

COLLEEN M. RESTEL (admitted *pro hac vice*)

crestel@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar No. 151445)

tkeller@kbkllp.com

JANE KIM (Cal. Bar No. 298192)

jkim@kbkllp.com

GABRIELLE L. ALBERT (Cal. Bar No. 190895)

galbert@kbkllp.com

425 Market Street, 26th Floor

San Francisco, California 94105

Telephone: (415) 496-6723

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

**DECLARATION OF JEFFREY D. PROL IN
SUPPORT OF FIFTH INTERIM FEE
APPLICATION LOWENSTEIN SANDLER
LLP AS COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM SEPTEMBER 1, 2024
THROUGH AND INCLUDING
DECEMBER 31, 2024**

1 I, Jeffrey D. Prol, hereby declares, pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am a partner in the law firm of Lowenstein Sandler LLP (“**Lowenstein**”), lead
3 counsel to the Official Committee of Unsecured Creditors (“the “**Committee**”) of the Roman
4 Catholic Bishop of Oakland (the “**Debtor**”) in connection with the above-referenced chapter 11
5 case (the “**Chapter 11 Case**”). I am familiar with the *Order Authorizing Procedures for Interim*
6 *Compensation and Reimbursement of Expenses of Professionals* [Dkt. 170] (the “**Interim**
7 **Compensation Order**”), the *United States Trustee Appendix B Guidelines for Reviewing*
8 *Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by*
9 *Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013 (the “**U.S. Trustee**
10 **Guidelines**”) and the *Guidelines for Compensation and Expense Reimbursement of Professionals*
11 *and Trustees for the Northern District of California*, dated February 19, 2014 (the “**Local**
12 **Guidelines**”).

13 2. This Declaration is submitted in support of the *Fifth Interim Fee Application of*
14 *Lowenstein Sandler LLP as Counsel to the Official Committee of Unsecured Creditors for*
15 *Allowance and Payment of Compensation and Reimbursement of Expenses for the Period From*
16 *September 1, 2024 Through and Including December 31, 2024* (the “**Application**”).¹

17 3. Pursuant to the Local Guidelines, Lowenstein states as follows:

- 18 a. I have read the Application;
- 19 b. To the best of my knowledge, information and belief formed after
20 reasonable inquiry, except as set forth in the Application, the fees and
21 disbursements sought fall within the Local Guidelines; and
- 22 c. The fees and disbursements sought are billed at rates in accordance with
23 those generally charged by Lowenstein and generally accepted by
24 Lowenstein’s clients.

25 4. The Debtor, the Debtor’s professionals, and the U.S. Trustee are each being
26 provided with a copy of the Application in accordance with the Interim Compensation Order.

27
28 ¹ All capitalized terms not defined herein have the meaning given to them in the Application.

1 5. As required by the Interim Compensation Order, Lowenstein sent monthly billing
2 statements to the Debtor during the Compensation Period. In addition, the Debtor and the U.S.
3 Trustee are each being provided with a copy of the Application in accordance with the Interim
4 Compensation Order.

5 6. Lowenstein responds to the questions identified in the U.S. Trustee Guidelines as
6 follows:

7 **(a) Question:** Did you agree to any variations from, or alternatives to, your standard or
8 customary billing arrangements for this engagement?

9 Response: Yes. Lowenstein agreed to reduce its hourly rates for the benefit of the
10 Committee's constituency (i.e., holders of sexual abuse claims against the
11 Debtor). In order to assure that any price reduction inures solely to the
12 benefit of the Committee's constituency, Lowenstein will hold ten percent
13 of all fees received in this Chapter 11 Case in a trust account to benefit
14 sexual abuse claimants. The funds will be contributed to the trust
15 established for the benefit of Survivors through a plan of reorganization in
16 this Chapter 11 Case. If no such trust is created, the funds will be donated
17 to a child advocacy organization to be selected by the Committee at the
18 conclusion of the Chapter 11 Case. Additionally, Lowenstein has agreed
19 not to charge the Committee for its travel time to and from the San Francisco
20 Bay area.

21 **(b) Question:** If the fees sought in this fee application as compared to the fees budgeted
22 for the time period covered by this fee application are higher by 10% or
23 more, did you discuss the reasons for the variation with the client?

24 Response: Not Applicable. The fees sought in this Application do not exceed the fees
25 budgeted for the time period covered.

26 **(c) Question:** Do any of the professionals included in this engagement vary their rate
27 based on the geographic location of the bankruptcy case?

28 Response: Lowenstein's professionals included in this engagement have not varied
their rate based on the geographic location of the Chapter 11 Case.

(d) Question: 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.

 Response: No.

(e) Question: Does the 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.

1 Response: No.

2 **(f) Question:** If the fee application includes any rate increases since retention: i. Did your
3 client review and approve those rates in advance? ii. Did your client agree
4 when retaining the law firm to accept all future rate increases? If not, did
5 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?

6 Response: The Application does not include any rate increases since retention.

7 8. Attached as **Exhibit A** is a true and correct copy of an email transmitting the
8 Application to the Chairperson of the Committee advising the Committee of the right to review
9 and object to the compensation and expense reimbursement sought therein.

10 Pursuant to 28 U.S.C. § 1746, I hereby declare under the penalty of perjury that the
11 foregoing statements made by me are true and correct to the best of my knowledge. Executed this
12 14th day of February, 2025 in Roseland, New Jersey.

13
14 By: /s/ Jeffrey D. Prol
Jeffrey D. Prol
15
16
17
18
19
20
21
22
23
24
25
26
27
28