

*Counsel for the Debtor  
and Debtor in Possession*

In re:

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

Debtor.

[No Hearing Requested]

<b>Name of Applicant:</b>	<b>Foley &amp; Lardner LLP</b>
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Effective as of May 8, 2023 by Order entered June 15, 2023 [Dkt. No. 145]
Period for Which Compensation and Reimbursement is Sought:	March 1, 2025 – March 31, 2025
Amount of Compensation Sought as Actual, Reasonable and Necessary: <sup>1</sup>	\$435,530.50
20% Holdback:	\$87,106.10
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: <sup>2</sup>	\$4,451.33
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought:	\$352,875.73

### **PRELIMINARY STATEMENT**

On May 8, 2023 (the “Petition Date”), The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor” or “RCBO”)<sup>3</sup> commenced the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case” or the “Bankruptcy Case”). The Debtor continues to operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in this Chapter 11 Case.

On May 23, 2023, the Debtor filed the *Debtor’s Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§ 327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Dkt. No. 60] (the “Retention Application”). The Court approved the Retention Application on June 15, 2023, entering the *Order Approving Debtor’s*

<sup>1</sup> Foley & Lardner LLP has agreed not to bill the Debtor for the time it takes its attorneys to travel to or from the Bay Area and such amounts are not included in this Monthly Fee Statement.

<sup>2</sup> Foley & Lardner LLP has agreed not to bill the Debtor for the expenses for its attorneys to travel to or from the Bay Area, in connection with this Chapter 11 Case, and such amounts are not included in this Monthly Fee Statement.

<sup>3</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Order.

1 *Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§*  
2 *327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Dkt.  
3 No. 145] (the “Foley Retention Order”).

4 Also on May 23, 2023, the Office of the United States Trustee filed its notice of appointment of  
5 an Official Committee of Unsecured Creditors [Dkt. No. 58].

6 On May 26, 2023, the Debtor filed the *Debtor’s Motion for an Order Establishing Procedures for*  
7 *Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 70] (the  
8 “Compensation Procedures Motion”). The Court granted the Compensation Procedures Motion on June  
9 23, 2023, entering the *Order Authorizing Procedures for Interim Compensation and Reimbursement of*  
10 *Expenses of Professionals* [Dkt. No. 170] (the “Compensation Procedures Order”).

11 Foley & Lardner LLP (“Foley” or “Applicant”), as general bankruptcy counsel to the Debtor,  
12 hereby submits its twenty second monthly fee statement (the “Monthly Fee Statement”) for allowance of  
13 payment of compensation for professional services rendered and for reimbursement of actual and  
14 necessary expenses incurred for the period commencing March 1, 2025 through and including March 31,  
15 2025 (the “Fee Period”) pursuant to the Compensation Procedures Order.

16 By this Monthly Fee Statement, Foley seeks (i) a monthly interim allowance of compensation in  
17 the amount of \$435,530.50 and actual and necessary expenses in the amount of \$4,451.33 for a total  
18 allowance of \$439,981.83 and (ii) payment of \$348,424.40 (80% of the allowed fees pursuant to the  
19 Compensation Procedures Order) and reimbursement of \$4,451.33 (100% of the allowed expenses  
20 pursuant to the Compensation Procedures Order) for a total payment of \$352,875.73 for the Fee Period.

21 **SERVICES RENDERED AND EXPENSES INCURRED DURING THE FEE PERIOD**

22 Attached as **Exhibit 1** is the name of each of Foley’s professionals and paraprofessionals who  
23 performed services for the Debtor in connection with this Chapter 11 Case during the Fee Period covered  
24 by this Monthly Fee Statement and the hourly rate and total fees for each professional during the Fee  
25 Period.

26 Attached as **Exhibit 2** is a summary of hours by category during the Fee Period.  
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Attached as **Exhibit 3** is a summary of expenses included in this Monthly Fee Statement incurred during the Fee Period.

Attached as **Exhibit 4** are the detailed time entries for Foley's professionals and paraprofessionals during the Fee Period.

### **NOTICE AND OBJECTION PROCEDURES**

In accordance with the Compensation Procedures Order, each Notice Party shall have until the tenth (10<sup>th</sup>) day (or the next business day if such day is not a business day) following service of this Monthly Fee Statement (the "**Objection Deadline**") to serve an objection to the Monthly Fee Statement on Foley and each of the other Notice Parties.

Upon the expiration of the Objection Deadline, the Applicant shall file a certificate of no objection with the Court, after which the Debtor is authorized and directed to pay the Applicant an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement.

If an objection is properly filed, the Debtor shall be authorized and directed to pay the Applicant 80% of the fees and 100% of the expenses not subject to an objection.

DATED: April 30, 2025

**FOLEY & LARDNER LLP**

Eileen R. Ridley  
Shane J. Moses  
Ann Marie Uetz  
Matthew D. Lee  
Geoffrey S. Goodman  
Mark C. Moore

/s/ Shane J. Moses

SHANE J. MOSES

*Counsel for the Debtor  
and Debtor in Possession*

**EXHIBIT 1**

**Compensation by Professional  
March 1, 2025 – March 31, 2025**

<b>Name of Professional Individual</b>	<b>Initials</b>	<b>Position of the Professional, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Alexander A. Witz	AAWT	Associate, 2024	\$525	12.70	\$6,667.50
Joseph S. Harper	JSH	Associate, 2016	\$800	4.00	\$3,200.00
Mason Roberts	MR	Associate, 2018	\$795	14.00	\$11,130.00
Mary Rofaeil	MRL	Associate, 2021	\$675	44.50	\$30,037.50
Mikaela R. Mitcham	MRM	Associate, 2021	\$675	5.60	\$3,780.00
Matthew Kass	MTKS	Associate, 2023	\$575	3.00	\$1,725.00
Michael W. Berg	MWBE	Associate, 2023	\$600	4.60	\$2,760.00
Nora McGuffey	NMCG	Associate, 2020	\$700	2.70	\$1,890.00
Shane J. Moses	SJM	Of Counsel, 2005	\$875	74.90	\$65,537.50
Brittnie M. Werner	BMWE	Paralegal, N/A	\$290	1.10	\$319.00
Janelle C. Harrison	JCH	Paralegal, N/A	\$330	29.70	\$9,801.00
Kerry A Farrar	KAFA	Paralegal, N/A	\$450	57.80	\$26,010.00
Ann Marie Uetz	AMUE	Partner, 1993	\$1,050	65.70	\$68,985.00
Eileen R. Ridley	ERR	Partner, 1990	\$1,100	19.90	\$21,890.00
Emil P. Khatchatourian	EPK	Partner, 2009	\$875	15.30	\$13,387.50
Geoffrey S. Goodman	GSG	Partner, 1999	\$1,050	14.50	\$15,225.00
Heidi M. Furlong	HMF	Partner, 2001	\$1,100	1.30	\$1,430.00
Jonathan Michael Thomas	JMT	Partner, 2010	\$875	2.40	\$2,100.00
Jeff R. Blease	JRBL	Partner, 1998	\$1,375	0.60	\$825.00
Lisa F. Glahn	LFG	Partner, 2000	\$1,200	2.20	\$2,640.00
Mark C. Moore	MCM	Partner, 2010	\$925	46.20	\$42,735.00
Matthew D. Lee	MDL	Partner, 2006	\$875	52.00	\$45,500.00
Jacob Stamm	JS	Projection Assistant, N/A	\$210	\$0.20	\$42.00
Alan R. Ouellette	AROU	Senior Counsel, 2010	\$875	2.90	\$2,537.50
Elizabeth P. Mazzocco	EPM	Senior Counsel, 2014	\$840	34.10	\$28,644.00
Laura P. Mikeworth	LPM	Senior Counsel, 2017	\$815	4.30	\$3,504.50
Mikle S-K Jew	MSKJ	Senior Counsel, 2017	\$825	4.30	\$3,547.50
Tamar N. Dolcourt	TND	Special Counsel, 2009	\$800	24.60	\$19,680.00
<b>TOTAL</b>				<b>545.10</b>	<b>\$435,530.50</b>

**EXHIBIT 2**

**Compensation by Category  
March 1, 2025 – March 31, 2025**

Category	Hours Billed this Fee Period	Total for Fee Statement
003 – Automatic Stay	7.60	\$6,727.50
004 – Bankruptcy Litigation/Adversary Proceedings	28.50	\$26,815.00
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues	14.30	\$11,711.00
006 – Case Administration (Docket Updates, WIP and calendar)	12.00	\$4,695.00
007 – Chapter 11 Plan/ Plan Confirmation	24.30	\$19,191.00
008 – Communications with Client	23.80	\$22,427.50
011 – Cash Management	1.90	\$1,662.50
012 – Disclosure Statement	161.10	\$136,092.00
015 – Executory Contracts / Lease Issues	3.60	\$3,150.00
016 – General Case Strategy (includes calls with client and team calls)	28.10	\$23,605.00
017 – Hearings and Court Matters	12.60	\$12,055.00
018 – Non-Bankruptcy Litigation	56.20	\$33,141.00
020 – Retention/Billing/Fee Applications for Debtor Professionals	20.50	\$15,237.00
021 – Retention/ Fee Applications: Ordinary Course Professionals	1.40	\$1,120.00
022 – Retention/ Fee Applications: Other Professionals	4.70	\$3,359.00
025- U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Reports	2.00	\$1,477.50
026 – Unsecured Creditors Issues/Communications/Meetings	1.20	\$1,050.00
027 – Real Estate and Real Property Issues	2.80	\$2,750.00
029 – Non-tort Proofs of Claim	0.20	\$175.00
031 – Insurance Issues (coverage, includes adversary proceeding)	103.40	\$82,297.00
032 – Rule 2004 Motions/Discovery/Subpoenas	8.70	\$4,755.00
034 – Other Motion Practice	5.10	\$3,965.00
035 – General Counsel Matters	9.70	\$7,911.50
037 – Financing	6.50	\$5,980.00
038 – Mediation	4.90	\$4,181.00
<b>TOTAL</b>	<b>545.10</b>	<b>\$435,530.50</b>

**EXHIBIT 3**

**Expense by Category  
March 1, 2025 – March 31, 2025**

<b>Costs/Expense</b>	<b>Amount Billed</b>
Deposition / Transcripts, Exams	\$333.05
Electronic Legal Research Services	\$163.78
LSS – eDiscovery Services	\$3,900.00
Other Expenses	\$54.50
<b>TOTAL</b>	<b>\$4,451.33</b>

**EXHIBIT 4**

**Time Detail Entries  
March 1, 2025 – March 31, 2025**

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FOLEY & LARDNER LLP  
111 HUNTINGTON AVENUE  
SUITE 2600  
BOSTON, MASSACHUSETTS 02199-7610  
TELEPHONE (617) 342-4000  
FACSIMILE (617) 342-4001  
WWW.FOLEY.COM

Roman Catholic Bishop of Oakland  
Attn: Attila Bardos  
Chief Financial Officer  
Diocese of Oakland  
2121 Harrison St., Ste. 100  
Oakland, CA 94612

Date: April 30, 2025  
Invoice No.: 51056337  
Our Ref. No.: 100845-0402

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Services through March 31, 2025

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	\$435,530.50
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Total Expenses:	\$4,451.33
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<b>Amount Due:</b>	<b>\$439,981.83</b>
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Please reference your invoice number 51056337 with your remittance  
payable to Foley & Lardner LLP. Payment is due promptly upon receipt  
of our invoice.

Federal Employer Number:  
39-0473800

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**Professional Services Detail****003 Automatic Stay**

03/03/25	EPK	Analyze cases identified by Judge Chatterjee relating to effect of bankruptcy stays on non-debtor co-defendants.	0.40	\$350.00
03/03/25	NMCG	Review case law regarding the non-debtor stay under California law.	0.30	\$210.00
03/24/25	ERR	Review status of issues related to effect of stay vis a vis policy limits demands.	0.50	\$550.00
03/25/25	MCM	Analysis of stay issues in connection with issuance of demand letters by plaintiffs in state-court litigation.	0.40	\$370.00
03/26/25	AMUE	Analyze automatic stay issue.	0.70	\$735.00
03/26/25	ERR	Review communications with M. Plevin (CNA counsel) regarding issues related to settlement demands regarding insurers.	0.50	\$550.00
03/26/25	JSH	Analyze insurance demand letter automatic stay issue.	0.30	\$240.00
03/26/25	MDL	Evaluate impact of automatic stay on survivor policy limits demands.	0.20	\$175.00
03/27/25	MSKJ	Review correspondence and notes regarding Plevin demand letter regarding violation of automatic stay (.2); correspondence regarding same (.1); analyze 9th Circuit authorities regarding same (.5).	0.80	\$660.00
03/28/25	MSKJ	Analyze authorities provided by Continental's counsel supporting contention regarding claimant demand letters to insurer constituting violation of automatic stay (.7); analyze 9th Circuit authorities regarding same (.5); prepare research memo regarding same (.9).	2.10	\$1,732.50

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03/30/25	MSKJ	Continue analyzing federal bankruptcy authorities regarding Continental's claim that claimant letters requesting insurance coverage information violates the automatic stay (.8); continue preparing research memo regarding same (.5); correspondence regarding same (.1).	1.40	\$1,155.00
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Task Total:	7.60	\$6,727.50
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**004 Bankruptcy Litigation/Adversary Proceedings**

03/03/25	AMUE	Continued negotiations with Committee regarding proposed stipulation concerning property of the estate by review of proposed changes (.5) and communications with Foley team regarding response (.7).	1.20	\$1,260.00
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03/03/25	GSG	Prepare for hearing on motions to dismiss Committee adversary complaints (6.3); review OPF order (.1); meeting with team regarding motion to dismiss hearing (.4).	6.80	\$7,140.00
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03/03/25	MDL	Meet with S. Moses to discuss property of the estate stipulation.	0.60	\$525.00
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03/03/25	MDL	Strategize for motion to dismiss hearing with S. Moses and G. Goodman.	0.40	\$350.00
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03/03/25	MDL	Strategize with Foley team regarding property of the estate stipulation.	0.40	\$350.00
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03/03/25	MDL	Revise section 546 stipulation proposed by Committee.	0.60	\$525.00
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03/03/25	SJM	Prepare for hearings on motions to dismiss Committee adversary proceedings.	2.30	\$2,012.50
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03/03/25	SJM	Confer with M. Lee regarding property of the estate stipulation (.3); revise draft stipulation (.3); emails with case team regarding same (.3).	0.90	\$787.50
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03/03/25	SJM	Review Committee-proposed section 546 stipulation (.2); email to Foley team regarding approach to same (.2).	0.40	\$350.00
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03/04/25	GSG	Edit property of the estate stipulation (.3); meeting with M. Lee regarding same (.2); correspondence with B. Weisenberg regarding same (.3).	0.80	\$840.00
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03/04/25	MCM	Conference call with Foley team regarding motions to dismiss Committee filings.	0.50	\$462.50
03/04/25	MDL	Meet with counsel for RCC, RCWC, OPF, and Adventus following hearing on motions to dismiss Committee adversary proceedings to discuss results of hearing, potential OPF stipulation, and amended plan terms.	1.00	\$875.00
03/04/25	MDL	Strategize with Foley team regarding revisions to property of the estate stipulation.	0.80	\$700.00
03/04/25	SJM	Continue to prepare for hearing on motions to dismiss.	1.60	\$1,400.00
03/04/25	SJM	Call with A. Uetz, M. Lee, and G. Goodman regarding property of the estate stipulation (.8); draft cover email to Committee counsel regarding same (.2).	1.00	\$875.00
03/05/25	GSG	Telephone conference with B. Weisenberg and M. Lee regarding property of the estate stipulation (.3); follow-up call with M. Lee regarding same (.2); telephone conference with team regarding OPF and Committee issues (.6).	1.10	\$1,155.00
03/05/25	MDL	Telephone conference with G. Goodman and B. Weisenberg regarding property of the estate stipulation.	0.30	\$262.50
03/05/25	MDL	Follow-up telephone conference with G. Goodman regarding negotiations over property of the estate stipulation.	0.20	\$175.00
03/06/25	GSG	Review Committee's edits to property of the estate stipulation (.2); comment on same (.3); telephone conference with M. Lee regarding same (.2).	0.70	\$735.00
03/06/25	MDL	Analyze Committee revisions to property of the estate stipulation.	0.30	\$262.50
03/06/25	MDL	Telephone conference with G. Goodman regarding property of the estate stipulation.	0.20	\$175.00
03/10/25	MDL	Evaluate additional changes needed to property of the estate stipulation.	0.10	\$87.50
03/11/25	JSH	Review draft settlement agreement with Bennett Trust (.3); communications with probate counsel R. Lund regarding the same (.3).	0.60	\$480.00

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03/12/25	JSH	Analyze client communications regarding draft settlement agreement with Bennett Trust.	0.10	\$80.00
03/13/25	GSG	Review draft of 546(a) stipulation (.1); comment on same (.1).	0.20	\$210.00
03/13/25	MDL	Revise section 546(a) stipulation.	0.10	\$87.50
03/13/25	MDL	Revise property of the estate stipulation.	0.80	\$700.00
03/13/25	SJM	Email to Committee counsel regarding property of the estate stipulation.	0.20	\$175.00
03/14/25	GSG	Telephone conference with B. Weisenberg regarding property of the estate stipulation (.3); telephone conference with M. Lee regarding same (.2).	0.50	\$525.00
03/14/25	JSH	Work on finalizing Bennett Trust 9019 motion documents.	0.30	\$240.00
03/14/25	MDL	Correspondence with B. Weisenberg (Lowenstein) regarding property of the estate stipulation.	0.10	\$87.50
03/14/25	MDL	Further revisions to property of the estate stipulation.	0.30	\$262.50
03/17/25	JSH	Communications with state court counsel R. Lund regarding Bennett Trust settlement.	0.10	\$80.00
03/19/25	GSG	Correspondence with M. Lee regarding property of the estate stipulation.	0.10	\$105.00
03/20/25	JSH	Call with M. Lee regarding 9019 motion papers (.1); finalize 9019 motion papers for client review (.4); communications with client regarding the same (.1).	0.60	\$480.00
03/20/25	MDL	Evaluate revised Bennett Trust settlement agreement and confirm settlement motion papers are consistent.	0.40	\$350.00
03/20/25	MDL	Provide instruction to J. Harper regarding finalization of motion to approve settlement with Bennett Trust.	0.20	\$175.00
03/20/25	SJM	Respond regarding scheduling for settlement motion with Bennett Trust.	0.20	\$175.00
03/21/25	MDL	Strategize regarding Rule 9019 motion with Bennett Trust.	0.30	\$262.50

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03/26/25	GSG	Review Committee's edits to property of the estate stipulation.	0.30	\$315.00
03/27/25	JSH	Communications with client regarding 9019 motion papers for Bennett Trust settlement.	0.20	\$160.00
03/28/25	JSH	Communications with client regarding 9019 motion papers for Bennett Trust settlement (.1); finalize 9019 motion papers, including declaration and exhibit (.5); communications with S. Moses regarding hearing date and filing (.1).	0.70	\$560.00
Task Total:			28.50	\$26,815.00

**005 Bar Date Motion/ Claims Reconcil./ Claim Reconciliation Issues**

03/03/25	EPK	Email correspondence with R. Manns of NRF and B. Weisenberg of Lowenstein regarding comments to the stipulation with RCWC to amend the bar date order.	0.20	\$175.00
03/03/25	JCH	Update spreadsheet of confidentiality agreements executed by insurer parties.	0.50	\$165.00
03/03/25	KAFA	Research document hold notice matter.	0.50	\$225.00
03/05/25	MCM	Analysis of potential RCWC liability in light of list provided by Committee of claims.	0.60	\$555.00
03/06/25	EPK	Confer with the Foley restructuring team regarding approval of form of amended bar date order (.2); email correspondence with R. Manns of NRF and the Lowenstein team regarding approval of stipulation relating to same and filing of stipulation (.3); review form of stipulation to be submitted (.1); email correspondence with M. Moore and R. Manns of NRF regarding form of confidentiality agreement to be executed by RCWC (.1).	0.70	\$612.50
03/06/25	MCM	Email correspondence with counsel for RCWC regarding execution of confidentiality agreement pursuant to bar date order and entry of stipulation allowing access to unredacted proofs of claim.	0.50	\$462.50

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03/07/25	AMUE	Review multiple communications with B. Weisenberg regarding amendment to bar date order (.6) and provide advice to Foley team regarding same (.6).	1.20	\$1,260.00
03/07/25	EPK	Email correspondence with R. Manns of NRF and M. Moore regarding Authorized Party Confidentiality Agreement (.2); email correspondence with R. Manns of NRF, B. Weisenberg of Lowenstein, and the Foley restructuring team regarding further changes to the survivor claim confidentiality protocol (.3).	0.50	\$437.50
03/07/25	JCH	Update spreadsheet of confidentiality agreements executed by insurer parties.	0.50	\$165.00
03/07/25	MCM	Email correspondence with counsel for RCWC and Committee regarding production of unredacted proofs of claim to RCWC and related issues (.3); conference call with counsel for RCWC regarding same (.4).	0.70	\$647.50
03/07/25	MDL	Email exchange with B. Weisenberg regarding further amendments to bar date order.	0.10	\$87.50
03/10/25	EPK	Email correspondence with R. Manns of NRF regarding status of stipulation relating to RCWC confidentiality protocol.	0.10	\$87.50
03/10/25	MCM	Email and telephone communications with counsel for Committee and counsel for RCWC regarding stipulation to allow access to proofs of claim and related issues (.6); email correspondence with Foley team regarding same with update (.2).	0.80	\$740.00
03/11/25	EPK	Review as-entered order adding RCWC as an authorized party under the Bar Date Order confidentiality protocol (.1); assess whether the same will be modified in the near term (.1).	0.20	\$175.00
03/11/25	MCM	Email correspondence with counsel for Committee and counsel for RCWC regarding stipulation to allow access to proofs of claim and related issues (.4); follow-up email correspondence with Foley team regarding status of discussions (.3).	0.70	\$647.50

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03/12/25	MCM	Continue working on issues in connection with sharing of proofs of claim with RCWC pursuant to Court-approved stipulation.	0.40	\$370.00
03/13/25	JCH	Prepare chart of pleadings modifying the bar date order.	0.70	\$231.00
03/13/25	MCM	Conference call with counsel for Committee and RCWC regarding claim stipulation and related issues (.3); review information from Committee regarding RCWC claims and reconcile against Debtor analysis (.5); follow-up calls with counsel for RCWC, then counsel for Committee, regarding same (.5); email correspondence with Foley team summarizing outcome and resolution (.2).	1.50	\$1,387.50
03/13/25	MDL	Email exchange with R. Manns and M. Moore regarding Committee demands on proof of claim stipulation amendment.	0.30	\$262.50
03/13/25	MDL	Telephone conference with R. Manns and M. Moore regarding Committee demands on proof of claim stipulation amendment.	0.30	\$262.50
03/17/25	MCM	Email correspondence with counsel for Committee and RCWC regarding production of RCWC claims for review.	0.30	\$277.50
03/18/25	MCM	Reconcile lists of potential RCWC claims for dissemination to counsel for same to facilitate production of proofs of claim for review.	0.80	\$740.00
03/21/25	JCH	Redact four proofs of claim.	0.50	\$165.00
03/21/25	MCM	Finalize preparations for production of certain unredacted proofs of claim to counsel for RCWC and production of all remaining redacted proofs of claim on attorneys-eyes-only basis.	0.50	\$462.50
03/24/25	MCM	Work on issues in connection with production of unredacted and redacted proofs of claim to RCWC and analysis of same to determine potential liability.	0.80	\$740.00

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03/28/25	MCM	Email correspondence with Foley team regarding production plan of litigation documents to RCWC and related issues.	0.40	\$370.00
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Task Total:	14.30	\$11,711.00
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**006 Case Administration (docket updates, WIP, and calendar)**

03/03/25	JCH	Update daily docket report.	0.50	\$165.00
03/04/25	EPK	Coordinate with J. Harrison and J. Harper regarding this week's updates to the master case calendar and key dates timeline.	0.20	\$175.00
03/04/25	JCH	Update Master Case Calendar and Timeline and circulate same to Foley group (.5); email and telephone correspondence with J. Harper and S. Moses regarding same (.5); calendar extended deadline to file removals (.1); update daily docket report (.5).	1.60	\$528.00
03/04/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.80	\$640.00
03/05/25	JCH	Update daily docket report.	0.50	\$165.00
03/06/25	JCH	Update daily docket report.	0.20	\$66.00
03/07/25	JCH	Prepare (.4) and file (.1) Notice of Core Service List as of March 7, 2025; update daily docket report (.2).	0.70	\$231.00
03/10/25	JCH	Update daily docket report.	0.50	\$165.00
03/11/25	JCH	Update daily docket report.	0.50	\$165.00
03/12/25	JCH	Update daily docket report.	0.50	\$165.00
03/13/25	JCH	Update daily docket report.	0.50	\$165.00
03/14/25	JCH	Update daily docket report.	0.50	\$165.00
03/17/25	EPK	Oversee this week's updates to the master case calendar and key dates timeline by J. Harper and J. Harrison.	0.20	\$175.00
03/17/25	JCH	Update Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$330.00

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03/17/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.30	\$240.00
03/18/25	JCH	Update daily docket report.	0.50	\$165.00
03/19/25	JCH	Update daily docket report.	0.50	\$165.00
03/20/25	JCH	Update daily docket report.	0.20	\$66.00
03/21/25	JCH	Update daily docket report.	0.50	\$165.00
03/24/25	JCH	Update daily docket report.	0.20	\$66.00
03/25/25	JCH	Update daily docket report.	0.20	\$66.00
03/26/25	JCH	Update daily docket report.	0.20	\$66.00
03/27/25	JCH	Update daily docket report.	0.20	\$66.00
03/28/25	JCH	Update daily docket report.	0.50	\$165.00
03/31/25	JCH	Update daily docket report.	0.50	\$165.00
Task Total:			12.00	\$4,695.00

**007 Chapter 11 Plan/ Plan Confirmation**

03/06/25	AMUE	Communications with finance team regarding plan funding (.4) and analyze plan funding (1.1).	1.50	\$1,575.00
03/09/25	SJM	Work on revisions to plan.	0.60	\$525.00
03/10/25	MCM	Analyze plan modification issues in advance of filing deadline on March 17, 2025.	0.50	\$462.50
03/11/25	JCH	Analyze plan-related documents for A. Uetz.	0.50	\$165.00
03/11/25	MCM	Analyze email correspondence regarding revisions to plan and related issues with proposal (.4); telephone conference with M. Lee regarding same and next steps (.5).	0.90	\$832.50
03/11/25	MDL	Telephone conference with B. Weisenberg (Lowenstein) regarding plan terms.	0.50	\$437.50
03/12/25	MDL	Telephone conference with A. Uetz regarding options for plan terms.	0.30	\$262.50

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03/13/25	MCM	Conference call with counsel for insurer regarding concern over solicitation issues (.4); email and telephone conference with KCC/Verita personnel regarding same and options for addressing (.4).	0.80	\$740.00
03/13/25	MDL	Revise third amended plan of reorganization.	2.70	\$2,362.50
03/14/25	MDL	Email exchange with R. Manns (Norton Rose Fulbright) regarding terms of RCWC plan contributions.	0.30	\$262.50
03/14/25	SJM	Analyze approach to Committee objections to Class 5 as voting class (1.0); email correspondence with M. Lee regarding same (.3).	1.30	\$1,137.50
03/17/25	JCH	Finalize (.4) and file (.1) third amended plan; prepare redlines of third amended plan and third amended disclosure statement (.5); file notice of filing with redlines attached (.2).	1.20	\$396.00
03/17/25	MCM	Revise draft Survivors' Trust Documents to align with third amended disclosure statement.	0.70	\$647.50
03/17/25	TND	Research on cramdown standards under Ninth Circuit law.	3.90	\$3,120.00
03/18/25	AMUE	Work on strategy related to third amended plan.	2.00	\$2,100.00
03/19/25	SJM	Analyze next steps regarding disclosure statement and plan in preparation for call with team (1.4); call with M. Moore and M. Lee (for part) regarding same (.8).	2.20	\$1,925.00
03/20/25	MCM	Draft email memorandum to Foley team regarding next steps in plan confirmation and action items moving toward solicitation (.6); conference call with M. Lee regarding potential research items in connection with same (.3); conference call with N. McGuffey regarding same (.3).	1.20	\$1,110.00
03/20/25	NMCG	Discuss evidentiary standard of plan confirmation with M. Moore.	0.20	\$140.00
03/21/25	JCH	Prepare draft of memorandum of law in support of confirmation of plan.	2.50	\$825.00

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03/24/25	JCH	Prepare file of amended plan and disclosure statement and related filings for A. Uetz.	0.50	\$165.00
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Task Total:	24.30	\$19,191.00
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**008 Communications with Client**

03/03/25	AMUE	Communications with finance team regarding privileged mediation issue.	0.60	\$630.00
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03/04/25	AMUE	Meeting with M. Kemner regarding mediation strategy.	0.40	\$420.00
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03/04/25	MDL	Email exchange with M. Kemner regarding sale of real estate and negotiations with Committee.	0.10	\$87.50
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03/04/25	MRL	Draft summary regarding privileged issue for client memorandum.	1.10	\$742.50
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03/04/25	SJM	Draft client update language regarding results of status conference.	0.40	\$350.00
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03/05/25	AMUE	Meeting with finance team regarding privileged issue concerning plan funding (2.6) and prepare for same (.8).	3.40	\$3,570.00
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03/05/25	AMUE	Communication with A. Bardos regarding financing plan funding.	0.30	\$315.00
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03/05/25	MDL	Meeting with VeraCruz, M. Kemner, A. Bardos, and Foley team regarding RCC loan collateral options.	2.70	\$2,362.50
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03/05/25	MDL	Second meeting with VeraCruz, A. Bardos, and Foley team regarding RCC loan collateral options.	0.70	\$612.50
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03/05/25	MDL	Email correspondence with A. Bardos regarding restricted cash issues and requirement to provide notice as to certain donations.	0.30	\$262.50
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03/05/25	MDL	Telephone conference with A. Bardos and S. Moses regarding restricted cash issues and requirement to provide notice as to certain donations.	0.30	\$262.50
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03/05/25	MDL	Correspondence with M. Kemner regarding RCC collateral issues.	0.10	\$87.50
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03/05/25	SJM	Attend client finance committee meeting.	2.50	\$2,187.50
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03/05/25	SJM	Call with M. Lee and A. Bardos regarding finance matters (.3); follow up on same (.2).	0.50	\$437.50
03/06/25	AMUE	Communication with A. Bardos regarding professional fees.	0.40	\$420.00
03/07/25	AMUE	Draft privileged communication to client leadership regarding post-mediation and plan issues.	1.40	\$1,470.00
03/11/25	AMUE	Meeting with M. Kemner, H. Osman and B. Adrian regarding third amended plan and disclosure statement.	0.50	\$525.00
03/11/25	TND	Call with RCBO communications team and A. Uetz on plan (.5); prepare information for communications teams regarding same (1.4).	1.90	\$1,520.00
03/17/25	SJM	Email to A. Bardos regarding Hopwood trust donation.	0.20	\$175.00
03/18/25	MCM	Communications with client regarding filing of third amended disclosure statement and plan and related issues.	0.70	\$647.50
03/19/25	MDL	Correspondence with M. Kemner regarding Committee position on assets to be transferred to Survivors' Trust.	0.20	\$175.00
03/25/25	AMUE	Draft revisions to memorandum for client regarding amended plan.	1.20	\$1,260.00
03/26/25	AMUE	Draft communication to M. Kemner and A. Bardos regarding Committee's objection to third amended disclosure statement.	0.50	\$525.00
03/27/25	AMUE	Draft privileged communication to Bishop Barber, M. Kemner and A. Bardos regarding reply brief (.8); review response received from Bishop Barber and reply to same (.3).	1.10	\$1,155.00
03/27/25	MDL	Email exchange with M. Kemner regarding Committee settlement overtures.	0.30	\$262.50
03/28/25	AMUE	Meeting with A. Bardos and M. Kemner regarding privileged issue concerning third amended disclosure statement.	1.00	\$1,050.00
03/28/25	MCM	Analyze client communications regarding recent contact with Committee counsel and related issues.	0.80	\$740.00

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03/28/25	SJM	Email to client regarding CCCEB funding.	0.20	\$175.00
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Task Total:	23.80	\$22,427.50
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**011 Cash Management**

03/07/25	SJM	Draft notice emails to Committee regarding cash management transfers.	0.60	\$525.00
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03/09/25	MDL	Revise cash management notice communications to U.S. Trustee and Committee attorneys.	0.10	\$87.50
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03/10/25	SJM	Email to Committee regarding notice of Hopwood trust gift.	0.30	\$262.50
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03/17/25	EPK	Review restricted funds analysis provided to the Committee last summer (.1); email correspondence with M. Lee regarding same (.1).	0.20	\$175.00
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03/21/25	SJM	Review CCCEB quarterly funding request (.3); email to J. Blumberg and Committee counsel regarding notice of intent to pay quarterly funding (.4).	0.70	\$612.50
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Task Total:	1.90	\$1,662.50
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**012 Disclosure Statement**

03/03/25	JCH	Calendar deadlines related to the third amended disclosure statement to be filed.	0.50	\$165.00
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03/05/25	SJM	Call with M. Lee and M. Moore regarding next steps on disclosure statement.	0.50	\$437.50
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03/09/25	SJM	Work on revisions to disclosure statement.	0.70	\$612.50
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03/10/25	AMUE	Outline revisions to disclosure statement (.8) and analyze assets to support funding proposed plan (1.1); analyze revisions to liquidation analysis (.9).	2.80	\$2,940.00
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03/10/25	MDL	Telephone conference with C. Moore (A&M) regarding liquidation analysis and best interest of creditors test.	0.40	\$350.00
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03/10/25	MRL	Analyze other diocese cases regarding liquidation analysis in the disclosure statements (2.3); email correspondence with A. Uetz regarding the same (.2).	2.50	\$1,687.50
03/11/25	AMUE	Analyze liquidation analysis revisions.	1.10	\$1,155.00
03/11/25	AMUE	Outline revisions to disclosure statement (1.4) and communications with M. Lee and M. Moore regarding same (.8).	2.20	\$2,310.00
03/11/25	MDL	Evaluate options for description of insurance assignment in disclosure statement.	0.10	\$87.50
03/11/25	MRL	Analyze other diocese cases regarding liquidation analysis in disclosure statements (.4); email correspondence with the Foley team regarding the same (.2).	0.60	\$405.00
03/11/25	SJM	Analyze further updates needed to third amended plan and disclosure statement.	1.40	\$1,225.00
03/11/25	TND	Review potential additional information for disclosure statement.	0.20	\$160.00
03/12/25	AMUE	Meeting with C. Moore and M. Lee regarding revisions to proposed plan and liquidation analysis (.6); prepare for meeting (.6); follow up check-in with M. Lee regarding same (.7).	1.90	\$1,995.00
03/12/25	MDL	Evaluate contributing factors for revised liquidation analysis for third amended plan and disclosure statement.	0.10	\$87.50
03/12/25	MDL	Telephone conference with C. Moore and A. Uetz regarding revised liquidation analysis for third amended plan and disclosure statement.	0.70	\$612.50
03/13/25	MDL	Strategize with S. Moses regarding disclosure statement updates.	0.30	\$262.50
03/13/25	MRL	Call with the Foley team and an insurer regarding ballots to the disclosure statement (.8); confer with the Foley team regarding the disclosure statement (.3); draft an email to the Foley team regarding the call with the insurer (.1).	1.20	\$810.00

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03/14/25	MCM	Continue working on solicitation issues prior to filing of third amended disclosure statement (.5); email correspondence regarding revisions to ballots and other documentation based on recommendation of claims and noticing agent (.3); analyze drafts of third amended plan and third amended disclosure statement prior to filing same (.7).	1.50	\$1,387.50
03/14/25	MDL	Revise third amended disclosure statement.	2.60	\$2,275.00
03/14/25	SJM	Analyze issue regarding requirement for verification of signatory on ballots.	0.80	\$700.00
03/15/25	MCM	Conference call with M. Lee regarding drafts of third amended disclosure statement and plan (.2); revise draft documents consistent with discussions (1.1); email correspondence with client parties disseminating drafts for review (.2).	1.50	\$1,387.50
03/15/25	MDL	Strategize for disclosure statement additions with M. Moore.	0.20	\$175.00
03/15/25	MDL	Continue to revise third amended disclosure statement.	1.60	\$1,400.00
03/16/25	MCM	Email and telephone communications with client parties regarding latest drafts of third amended disclosure statement and plan, to be filed on March 17, 2025 (.4); further revisions to documents prior to filing (.5).	0.90	\$832.50
03/17/25	AMUE	Revisions to third amended disclosure statement (2.1); draft notice of filing third amended plan and disclosure statement (1.9).	4.00	\$4,200.00
03/17/25	JCH	Prepare exhibits to third amended disclosure statement for filing (.5); finalize (.6) and file (.2) third amended disclosure statement.	1.30	\$429.00
03/17/25	MCM	Revise third amended disclosure statement, exhibits in support of same, and notice of filing with Foley team (1.3); email correspondence with client parties regarding same (.3).	1.60	\$1,480.00
03/17/25	MDL	Analyze revised RCWC authorization letter.	0.10	\$87.50
03/17/25	MDL	Analyze revised liquidation analysis.	0.30	\$262.50
03/17/25	MDL	Revise supplement to motion to approve disclosure statement.	0.80	\$700.00

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03/17/25	MDL	Revise notice of filing of amended disclosure statement.	0.50	\$437.50
03/17/25	MDL	Revise amended disclosure statement.	0.80	\$700.00
03/17/25	MDL	Revise updated Class 4 and Class 5 ballots.	0.20	\$175.00
03/17/25	MDL	Email exchange with R. Manns (Norton Rose Fulbright) regarding amendments to plan and disclosure statement.	0.20	\$175.00
03/17/25	MDL	Strategize with Foley team for amended plan and disclosure statement.	1.60	\$1,400.00
03/17/25	SJM	Assist with finalizing third amended disclosure statement (1.2); revise notice of redlines of plan and disclosure statement (.4); draft supplement in support of motion to approve disclosure statement (1.8).	3.40	\$2,975.00
03/17/25	SJM	Revise proposed order approving disclosure statement (1.2); revise forms of ballots and notice of confirmation hearing (.6).	1.80	\$1,575.00
03/17/25	TND	Assist with finalizing notice of filing of amended disclosure statement.	0.30	\$240.00
03/18/25	JCH	Finalize (.4) and file (.1) supplement to motion to approve disclosure statement.	0.50	\$165.00
03/18/25	MCM	Follow-up work on third amended disclosure statement and plan issues in advance of contested hearing scheduled for April 1, 2025 on approval of disclosure statement.	1.00	\$925.00
03/18/25	MDL	Revise supplemental filing in support of disclosure statement motion.	0.40	\$350.00
03/18/25	SJM	Revise supplement to motion to approve disclosure statement (1.2); finalize exhibits to same (.5).	1.70	\$1,487.50
03/20/25	JCH	Prepare draft reply to Committee's objection to third amended disclosure statement.	0.80	\$264.00
03/20/25	MRL	Confer with M. Moore regarding updates to the diocese cases in preparation for the confirmation hearing (.2); analyze pending diocese cases for an update to the Debtor's disclosure statement (1.2).	1.40	\$945.00
03/21/25	MRL	Continue analyzing pending diocese cases for an update to the Debtor's disclosure statement.	0.70	\$472.50

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03/23/25	MRL	Analyze Debtor's reply to the Committee's objection to the disclosure statement.	0.30	\$202.50
03/24/25	MCM	Analysis of Committee objection to third amended disclosure statement (.7); email correspondence regarding reply to same from Debtor (.4).	1.10	\$1,017.50
03/24/25	MRL	Finalize analysis of pending diocese cases for an update to the Debtor's disclosure statement (.9); draft an email to M. Moore regarding the status of the cases (.3).	1.20	\$810.00
03/24/25	MRL	Begin drafting the Debtor's reply to the Committee's objection to the disclosure statement (.6); analyze the Committee's objection to the disclosure statement (.5).	1.10	\$742.50
03/24/25	SJM	Brief review of Committee objection to third amended disclosure statement (.5); email to Foley team regarding same (.2); analyze objection and potential reply arguments (1.4).	2.10	\$1,837.50
03/25/25	AMUE	Analyze Committee's objection to third amended disclosure statement (1.2); outline arguments for reply brief in support of third amended disclosure statement (3.1).	4.30	\$4,515.00
03/25/25	MCM	Continue analysis of Committee objection to third amended disclosure statement (1.0); conference call with Foley team regarding preparation of reply to same and hearing on approval of disclosure statement (partial) (.7).	1.70	\$1,572.50
03/25/25	MRL	Confer with A. Uetz, M. Moore, and S. Moses to strategize the Debtor's reply to the Committee's objection to the disclosure statement (1.9); continue drafting the Debtor's reply to the Committee's objection to the disclosure statement (4.4).	6.30	\$4,252.50
03/25/25	SJM	Begin work on reply in support of third amended disclosure statement (1.4); call with Foley team regarding Committee objection and strategy for reply (1.8); prepare chart of arguments made by Committee in objection to third amended disclosure statement (.9).	4.10	\$3,587.50

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03/26/25	AMUE	Analyze privileged issue regarding Committee;s objection to third amended disclosure statement (1.2) and outline arguments for reply brief (1.3); review transcript of Bishop Barber's statement concerning MAP (.8).	3.30	\$3,465.00
03/26/25	BMWE	Review Bishop Barber's Zoom video with MAP commission (.5); cross reference to transcript filed under seal of same video to ensure accuracy for attorney's use (.5); provide transcript and analysis findings to M. Moore (.1).	1.10	\$319.00
03/26/25	MCM	Analyze outline to draft reply to Committee objection to third amended disclosure statement (.6); slight revisions to third amended disclosure statement to resolve certain comments to language from Committee (.5); email correspondence with Foley team regarding same (.3); analyze transcript from Bishop Barber's comments in 2022 regarding MAP process (.5); revise draft reply in support of disclosure statement after consultation with Foley team (.6); prepare for hearing on approval of disclosure statement (1.0).	3.50	\$3,237.50
03/26/25	MCM	Email and telephone communications with claims and noticing agent regarding solicitation plan, necessary changes to claims register to account for misfiled proofs of claim by plaintiffs' counsel, and related issues.	0.50	\$462.50
03/26/25	MRL	Analyze with M. Mitcham and M. Moore regarding the unknown claimants representative objection (.3); continue drafting the Debtor's reply to the Committee's objection to the disclosure statement (5.6).	5.90	\$3,982.50
03/26/25	MRM	Analysis of voting status of unknown claims representative in approved plans.	1.20	\$810.00
03/26/25	SJM	Work on reply in support of third amended disclosure statement.	7.20	\$6,300.00
03/27/25	AMUE	Draft reply brief in support of third amended disclosure statement (3.2); meeting with M. Lee, M. Moore and S. Moses to discuss arguments for reply (.7).	3.90	\$4,095.00

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03/27/25	MCM	Email and telephone communications with claims and noticing agent regarding disclosure statement solicitation and follow-up on solicitation plan.	0.30	\$277.50
03/27/25	MCM	Revise latest draft of reply in support of third amended disclosure statement following prior comments (1.2); conference call with Foley team regarding same and hearing strategy (.8); further revisions to draft reply prior to dissemination to client parties (2.5); prepare for contested hearing on disclosure statement (.7).	5.20	\$4,810.00
03/27/25	MDL	Revise reply brief in support of third amended disclosure statement.	0.80	\$700.00
03/27/25	MDL	Strategize with Foley team regarding arguments in support of third amended disclosure statement (partial).	0.50	\$437.50
03/27/25	MRL	Revise the Debtor's reply to the Committee's objection to the disclosure statement to conform to S. Moses comments (4.0); revise the exhibits to the Debtor's reply to conform to A. Uetz's comments (1.5); confer with the Foley team regarding revisions to the Debtor's reply to the Committee's objection to the disclosure statement (.6); confer with A. Uetz regarding revising the exhibits to the Debtor's reply (.2).	6.30	\$4,252.50
03/27/25	MRM	Analysis concerning voting status of unknown claims representative in approved plans.	3.70	\$2,497.50
03/27/25	NMCG	Revise response to disclosure statement objection.	1.00	\$700.00
03/27/25	SJM	Call with Foley team regarding revisions to reply in support of disclosure statement (.7); further revisions to reply (2.4).	3.10	\$2,712.50
03/28/25	AMUE	Finalize reply brief in support of third amended disclosure statement (1.8); meeting with M. Moore and S. Moses to finalize reply brief (partial) (.4).	2.20	\$2,310.00
03/28/25	JCH	Finalize (.4) and file (.1) Debtor's reply to Committee's objection to third amended disclosure statement and Moses declaration in support.	0.50	\$165.00

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03/28/25	MCM	Further revisions to reply in support of third amended disclosure statement prior to filing of same (1.5); conference call with Foley team regarding same and hearing strategy (.6); call with S. Moses regarding same (.4); incorporate comments from client parties and circulate revised draft to Foley team (.5); prepare for hearing (.7).	3.70	\$3,422.50
03/28/25	MCM	Conference call with claims and noticing agent regarding solicitation plan, disclosure statement hearing, and timing assumptions for solicitation.	0.50	\$462.50
03/28/25	MRL	Confer with A. Uetz regarding the status of the reply (.2); revise the Debtor's reply to the Committee's objection to the disclosure statement to conform to A. Uetz's comments (2.1); confer with S. Moses and M. Moore regarding revisions to the reply (.5); call with the Foley team and the claims agent regarding solicitation of the plan (.6).	3.40	\$2,295.00
03/28/25	MRM	Research in connection with voting status of unknown claims representative in approved plans.	0.70	\$472.50
03/28/25	SJM	Review draft solicitation procedures order in preparation for call with Verita (.6); call with Verita and M. Moore regarding solicitation plan (.6).	1.20	\$1,050.00
03/28/25	SJM	Prepare declaration in support of reply in support of disclosure statement.	0.40	\$350.00
03/28/25	SJM	Call with Foley team regarding finalizing disclosure statement reply (.6); further revisions to reply (1.3).	1.90	\$1,662.50
03/30/25	MCM	Prepare for contested hearing on disclosure statement approval.	1.00	\$925.00
03/31/25	AMUE	Prepare for hearing on motion to approve third amended disclosure statement (3.8); meeting with M. Moore, S. Moses and E. Ridley to prepare for hearing on motion to approve third amended disclosure statement (2.0).	5.80	\$6,090.00
03/31/25	ERR	Attend strategy meeting regarding up-coming disclosure hearing (partial).	1.00	\$1,100.00
03/31/25	MDL	Telephone conference with Foley team to prepare for disclosure statement hearing.	1.00	\$875.00

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03/31/25	MDL	Strategize regarding disclosure statement hearing.	1.50	\$1,312.50
03/31/25	MRL	Email correspondence with the Foley team regarding organizing documents in preparation for the hearing (.6); confer with M. Moore regarding preparations for the hearing on the Debtor's disclosure statement (.4); confer with M. Moore and N. McGuffey regarding drafting a presentation for the hearing on the Debtor's disclosure statement (.3); draft a presentation for M. Moore in preparation for the hearing (1.2); confer with B. Werner regarding adding the Committee's letter to the Debtor's disclosure statement (.2); call with the Foley team to strategize for the hearing (2.0); revise the presentation to conform to M. Moore's comments (2.7).	7.40	\$4,995.00
03/31/25	NMCG	Call with M. Moore and M. Rofaail to discuss disclosure statement hearing preparation (.5); work on preparation for disclosure statement hearing with M. Rofaail (.7).	1.20	\$840.00
03/31/25	SJM	Meeting with M. Moore, E. Ridley (for part), and A. Uetz regarding preparation for hearing on disclosure statement (2.0); follow up with preparation for hearing (1.9).	3.90	\$3,412.50
03/31/25	SJM	Call with M. Moore regarding preparation for hearing on disclosure statement (.2); analyze open issues regarding solicitation procedure in preparation for hearing on disclosure statement (1.4); prepare for hearing on disclosure statement (2.1).	3.70	\$3,237.50
03/31/25	SJM	Review issues raised by U.S. Trustee with certain disclosure statement language (.4); emails to Foley team and J. Blumberg regarding proposed resolution (.3).	0.70	\$612.50
Task Total:			161.10	\$136,092.00

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**015 Executory Contracts/ Lease Issues**

03/07/25	SJM	Revise motion to extend time to assume or reject CCCEB lease.	3.60	\$3,150.00
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Task Total:	3.60	\$3,150.00
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**016 General Case Strategy (includes team calls)**

03/03/25	AMUE	Meet with Foley team to prepare for status conference (1.0); outline near-term strategy and assign tasks to team (1.4).	2.40	\$2,520.00
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03/03/25	MCM	Conference call with Foley team regarding status conference strategy and related issues.	0.90	\$832.50
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03/03/25	MDL	Strategize for status conference with Foley team (1.0); follow-up on same (.4).	1.40	\$1,225.00
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03/03/25	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$675.00
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03/03/25	SJM	Call with A. Uetz, M. Lee, and M. Moore regarding preparation for status conference (1.0); prepare for status conference hearing (1.2); attend status conference on disclosure statement and other matters (partial) (.6).	2.80	\$2,450.00
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03/05/25	MCM	Strategy call with Foley team regarding plan and adversary issues.	1.00	\$925.00
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03/05/25	MDL	Evaluate options for amendments to plan and disclosure statement.	0.80	\$700.00
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03/07/25	MRL	Review email correspondence from the Foley team regarding status of mediation.	0.20	\$135.00
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03/10/25	AMUE	Strategize with M. Lee to outline strategy regarding third amended plan of reorganization (.8); outline next action items for Foley team (.8).	1.60	\$1,680.00
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03/10/25	TND	Review filings and press releases in other cases regarding settlements or plan provisions (.4); discussion with A. Uetz on privileged matter (.2).	0.60	\$480.00
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03/11/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.60	\$405.00
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03/13/25	SJM	Call with M. Lee regarding disclosure statement and plan revisions, and other matters.	0.30	\$262.50
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03/17/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$540.00
03/18/25	MDL	Strategize regarding public statement on proposed amended plan.	0.60	\$525.00
03/18/25	MRL	Analyze upcoming tasks for client.	1.20	\$810.00
03/19/25	MDL	Strategize with M. Moore and S. Moses regarding confirmation-related tasks and deadlines for completing same.	1.60	\$1,400.00
03/20/25	MDL	Draft list of confirmation-related tasks and target completion dates.	1.60	\$1,400.00
03/21/25	AMUE	Meeting with M. Lee regarding next action items and strategy related to same (.5) and review of outstanding insurance issues (1.0).	1.50	\$1,575.00
03/21/25	MDL	Strategize with A. Uetz for long-term actions concurrent with seeking plan confirmation.	0.50	\$437.50
03/24/25	MRL	Review pending dioceses cases to provide an update on their status to client (.7); email correspondence with A. Uetz regarding the status of the Norwich bankruptcy case (.2).	0.90	\$607.50
03/25/25	GSG	Telephone conference with team regarding OPF and disclosure statement issues.	0.40	\$420.00
03/27/25	AMUE	Review privileged issue concerning San Francisco Archdiocese case.	0.80	\$840.00
03/28/25	MWBE	Research as requested by A. Uetz (1.8); discuss followup project regarding San Francisco Archdiocese bankruptcy and begin work on same (.5).	2.30	\$1,380.00
03/30/25	MWBE	Complete review of docketed materials in the bankruptcy case of the Archdiocese of San Francisco and summarize same as requested by A. Uetz.	1.60	\$960.00
03/30/25	MWBE	Discuss findings regarding Archdiocese of San Francisco bankruptcy with A. Uetz.	0.10	\$60.00
03/31/25	MWBE	Continue review of Archdiocese of San Francisco bankruptcy case and summarize as requested.	0.60	\$360.00
Task Total:			28.10	\$23,605.00

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**017 Hearings and Court Matters**

03/03/25	AMUE	Attend status conference.	1.00	\$1,050.00
03/03/25	ERR	Attend status hearing with Judge Lafferty.	1.00	\$1,100.00
03/03/25	MDL	Prepare for status conference.	1.40	\$1,225.00
03/03/25	MDL	Appear at status conference on behalf of Debtor (partial).	0.80	\$700.00
03/04/25	GSG	Continue preparing for hearing on motions to dismiss Committee's adversary complaints (1.4); participate in hearing on same (1.2); meet with team and Norton Rose team after same (1.0).	3.60	\$3,780.00
03/04/25	MDL	Evaluate results of motion to dismiss hearing.	0.80	\$700.00
03/04/25	MDL	Appear for Debtor at hearing on motions to dismiss Committee adversary proceedings.	1.50	\$1,312.50
03/04/25	MDL	Prepare for hearing on motions to dismiss Committee adversary proceedings.	1.00	\$875.00
03/04/25	SJM	Attend hearing on motions to dismiss.	1.50	\$1,312.50
Task Total:			12.60	\$12,055.00

**018 Non-Bankruptcy Litigation**

03/02/25	EPK	Review February 26, 2025 JCCP 5108 case management conference notes to identify action items for further follow-up.	0.10	\$87.50
03/03/25	AROU	Call with counsel for Roman Catholic Welfare Corporation regarding state court cases.	0.40	\$350.00
03/03/25	AROU	Analyze status of cases involving the Roman Catholic Welfare Corporation.	0.30	\$262.50
03/03/25	AROU	Analyze JCCP 5108 February case management order.	0.40	\$350.00

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03/03/25	EPK	Review CMC order issued by Judge Chatterjee (.2); evaluate action items to be addressed in connection with same (.5); email correspondence with C. Pelham of NRF regarding CMC order (.2); call with R. Manns and C. Pelham of NRF regarding same (.5); review scope of prior litigation holds involving RCWC and the schools (.3); email correspondence with Foley litigation team regarding same (.3); evaluate shared insurance issues relating to RCWC as co-defendant (.1).	2.10	\$1,837.50
03/06/25	EPK	Review prior litigation hold notices issued in 2019 (.3); email correspondence with R. Manns of NRF regarding same and related JCCP 5108 issues (.3).	0.60	\$525.00
03/10/25	AROU	Analyze status of JCCP 5108 lawsuits pending against Roman Catholic Welfare Corporation.	0.60	\$525.00
03/10/25	EPK	Email discussion with J. Leito of NRF and A. Ouellette regarding service history for schools cases (.2); email correspondence with A. Ouellette and K. Farrar regarding service information to be provided to the NRF team (.2).	0.40	\$350.00
03/10/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	1.80	\$810.00
03/11/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits (6.0); identify state court counsel for individual Committee members (.8); update summary of state court abuse cases (.4).	7.20	\$3,240.00
03/12/25	AROU	Analyze status of JCCP 5108 lawsuits pending against Roman Catholic Welfare Corporation.	0.30	\$262.50
03/12/25	EPK	Review chart prepared by K. Farrar regarding service information for schools-related cases (.1); email correspondence with J. Leito of NRF and A. Ouellette regarding same (.1).	0.20	\$175.00
03/12/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	1.50	\$675.00
03/13/25	AROU	Analyze JCCP 5108 lawsuits pending against Roman Catholic Welfare Corporation.	0.20	\$175.00

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03/19/25	EPK	Email correspondence with R. Manns of NRF regarding schools-related JCCP 5108 pleadings pursuant to confidentiality protocol (.2); review proposed pleadings file set to be transmitted to the NRF team (.3); confer with M. Moore and A. Ouellette regarding same (.3); separate email correspondence with J. Leito of NRF regarding draft of JCCP 5108 joint CMC statement and feedback on same (.2); comment on RCBO-specific aspects of the joint CMC statement (.4); email correspondence with D. Zamora of Weintraub Tobin regarding same (.1).	1.50	\$1,312.50
03/20/25	AROU	Analyze JCCP 5108 lawsuits pending against Roman Catholic Welfare Corporation.	0.30	\$262.50
03/20/25	EPK	Discussion with K. Farrar regarding JCCP 5108 schools litigation documents to be provided to the NRF litigation team (.5); email correspondence with D. Zamora of Weintraub Tobin and J. Leito of NRF regarding further revised joint CMC statement comments and proposed motion in limine (.5); review revised drafts of CMC statement (.2).	1.20	\$1,050.00
03/20/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	1.70	\$765.00
03/21/25	AROU	Analyze JCCP 5108 case management conference statement.	0.20	\$175.00
03/21/25	EPK	Review proposed remand dates for JCCP 5108 "Bucket 1" cases (.1); assess whether there are any "Bucket 2" cases involving RCBO as a co-defendant (.1); email correspondence with K. Farrar, and R. Manns and J. Leito of NRF, regarding file transfer protocol for schools cases pleadings and discovery documents (.3); brief review of as-filed JCCP 5108 joint case management statement (.1).	0.60	\$525.00
03/24/25	EPK	Email correspondence with R. Manns of NRF regarding protocol and timing for transmission of schools pleadings and discovery documents.	0.10	\$87.50
03/24/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	3.40	\$1,530.00

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03/25/25	EPK	Confer with M. Moore regarding confidentiality protocol for transfer of schools pleadings to the NRF team (.1); confer separately with K. Farrar regarding document compilation relating to same (.2).	0.30	\$262.50
03/25/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	3.20	\$1,440.00
03/26/25	AROU	Return call to counsel for Sisters of St. Joseph in JCCP 5108.	0.20	\$175.00
03/26/25	EPK	Email discussion with M. Moore, E. Mazzocco, and K. Farrar regarding confidentiality issues relating to schools case files prior to transmitting same to the NRF team (.3); email correspondence with R. Manns of NRF and J. Leito of NRF regarding schools litigation file transfer issues (.3); conference call with Foley team regarding confidentiality protocol and case file transfers (.5); review schools pleadings index and relevant case numbers (.3); attend the monthly JCCP 5108 CMC via Zoom (.8).	2.20	\$1,925.00
03/26/25	EPM	Conference calls with M. Moore and E. Khatchatourian regarding document productions (.5); prepare for same (.5).	1.00	\$840.00
03/26/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits (3.8); call with Foley team (M. Moore, E. Khatchatourian and E. Mazzocco) regarding same (.5).	4.30	\$1,935.00
03/26/25	MCM	Conference call with Foley team regarding JCCP 5108 case lists and associated productions (.5); analyze issues in connection with same (.5); email correspondence with counsel for Committee and RCWC regarding same and production of litigation documents (.3); email correspondence with Foley team issuing instructions for same (.3).	1.60	\$1,480.00

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03/27/25	EPK	Follow up with M. Moore regarding feedback from the Committee relating to production of schools litigation documents (.2); email correspondence with D. Zamora of Weintraub Tobin regarding email list of dioceses in bankruptcy requested by Judge Chatterjee in the JCCP 5108 (.2); conference call with R. Manns and J. Leito of NRF and M. Moore regarding protocol for production of schools litigation files and timing for same (.3); advise K. Farrar regarding agreed-upon protocol for production (.1).	0.80	\$700.00
03/27/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	10.00	\$4,500.00
03/27/25	MCM	Conference call with counsel for Committee and RCWC regarding production of litigation documents to RCWC (.4); follow-up conference call with counsel for RCWC and Foley team regarding same and go-forward timeline for productions (.5); email correspondence with K. Farrar regarding same (.3).	1.20	\$1,110.00
03/28/25	EPK	Follow up on status of schools litigation file transfer to the NRF team (.2); coordinate with K. Farrar regarding factual issues relating to same (.2).	0.40	\$350.00
03/28/25	EPM	Conference call with R. Manns, E. Ridley, and others regarding insurance coverage for RCWC (.4); call with E. Ridley to discuss same (.2); draft correspondence to RCWC counsel regarding same (.3).	0.90	\$756.00
03/28/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	4.20	\$1,890.00
03/31/25	EPK	Follow up with K. Farrar and E. Mazzocco regarding second layer of review of schools litigation documents to be produced to the NRF team.	0.20	\$175.00
03/31/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	0.60	\$270.00
Task Total:			56.20	\$33,141.00

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**020 Retention/Billing/Fee Applications for Debtor Professionals**

03/03/25	SJM	Emails to U.S. Trustee and Fee Examiner regarding LEDES files.	0.30	\$262.50
03/03/25	TND	Email to Hilco counsel on connections check for 327 application.	0.10	\$80.00
03/04/25	SJM	Respond to email from A. Uetz regarding potential revision of interim compensation procedures.	0.20	\$175.00
03/05/25	SJM	Follow up with Hilco regarding review of employment application.	0.20	\$175.00
03/06/25	AMUE	Provide advice regarding Hilco retention application.	0.60	\$630.00
03/06/25	SJM	Revise Hilco employment application.	0.70	\$612.50
03/06/25	TND	Revise Hilco Section 327 materials in accordance with comments from Hilco's counsel (.6); communications with Hilco team on filing (.3); confer with S. Moses on documents needed for filing (.2).	1.10	\$880.00
03/07/25	JCH	Finalize (.4) and file (.1) application to employ Hilco as real estate consultant, Kaup declaration and Bardos declaration.	0.50	\$165.00
03/07/25	SJM	Finalize Hilco employment application.	0.70	\$612.50
03/07/25	TND	Finalize Hilco retention application (.8); communications with S. Moses and J. Harrison on same (.2); email to L. Krucks of Hilco regarding filing status (.1).	1.10	\$880.00
03/11/25	JCH	Prepare (.4) and file (.1) certificate of no objection to Foley January 2025 monthly fee statement.	0.50	\$165.00
03/11/25	TND	Begin preparation of February fee statement to ensure compliance with U.S. Trustee guidelines.	0.50	\$400.00
03/12/25	TND	Review comments from U.S. Trustee on Hilco order (.1); draft revised Hilco order (.4); email correspondence with Hilco counsel on revised order (.2).	0.70	\$560.00
03/13/25	SJM	Emails with J. Blumberg regarding form of order for employment of Hilco (.2); revise proposed order (.2).	0.40	\$350.00

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03/13/25	TND	Work on Foley February fee statement to ensure compliance with U.S. Trustee guidelines.	2.10	\$1,680.00
03/14/25	TND	Further preparation of Foley February invoice to ensure U.S. Trustee compliance.	1.50	\$1,200.00
03/18/25	TND	Email to L. Krucks regarding Hilco engagement letter (.1); further preparation of February fee statement to ensure compliance with U.S. Trustee guidelines (.3).	0.40	\$320.00
03/19/25	TND	Further work on February fee statement to ensure U.S. Trustee compliance.	0.50	\$400.00
03/20/25	JCH	Review pleadings from numerous other diocese cases related to procedures for monthly fee statements.	0.80	\$264.00
03/20/25	TND	Further preparation of February fee statement to ensure compliance with U.S. Trustee guidelines.	1.10	\$880.00
03/20/25	TND	Begin research on other diocese cases for motion to amend interim compensation order.	0.20	\$160.00
03/21/25	TND	Draft motion and proposed order to amend interim compensation order (2.1); further preparation of February fee statement to ensure compliance with U.S. Trustee guidelines (.3).	2.40	\$1,920.00
03/24/25	TND	Review A&M fee application (.2); review Hilco fee application (.2).	0.40	\$320.00
03/25/25	SJM	Call and email with T. Dolcourt regarding upcoming compensation matters.	0.30	\$262.50
03/25/25	TND	Call with S. Moses on February fee statement filings (.2); email correspondence with A. Uetz, J. Harrison, and S. Moses on Foley statement (.2).	0.40	\$320.00
03/27/25	JCH	Prepare draft of Foley monthly fee statement for February 2025.	0.80	\$264.00
03/27/25	SJM	Revise Hilco first monthly fee statement.	0.30	\$262.50
03/27/25	TND	Email to S. Moses regarding Hilco fee (.1); review information for Foley February fee statement (.1).	0.20	\$160.00
03/28/25	JCH	Finalize (.4) and file (.4) Foley, A&M, Hilco and Verita monthly fee statements for February 2025.	0.80	\$264.00

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03/28/25	SJM	Review Foley monthly fee statement (.3); finalize monthly fee statements for debtor professionals (.4).	0.70	\$612.50
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Task Total:	20.50	\$15,237.00
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**021 Retention/Fee Applications: Ordinary Course Professionals**

03/01/25	TND	Review M. Kemner January OCP fee statement.	0.30	\$240.00
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03/03/25	TND	Emails to U.S. Trustee (.1) and Committee counsel (.1) regarding M. Kemner January 2025 invoice; email correspondence with A. Uetz on additional OCP retention (.1).	0.30	\$240.00
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03/10/25	TND	Review information needed to finalize additional OCP retention.	0.30	\$240.00
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03/19/25	TND	Review M. Kemner February fee statement.	0.20	\$160.00
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03/31/25	TND	Review changes needed to OCP order changing caps.	0.30	\$240.00
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Task Total:	1.40	\$1,120.00
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**022 Retention/Fee Applications: Other Professionals**

03/06/25	SJM	Email to client regarding payment of Sontchi fees for January 2025 (.2); email to client regarding January professional fee statements (.4).	0.60	\$525.00
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03/06/25	SJM	Analyze inquiry from KBK regarding fee payment.	0.30	\$262.50
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03/10/25	SJM	Email to client regarding notices of Committee member expense reimbursement.	0.40	\$350.00
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03/10/25	TND	Review notice of Committee member expenses (.1); discuss same with S. Moses (.1).	0.20	\$160.00
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03/12/25	SJM	Analyze Committee inquiry regarding professional fee payment.	0.80	\$700.00
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03/20/25	SJM	Email to client regarding payment of Committee member expense reimbursements.	0.70	\$612.50
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03/31/25	JCH	Prepare chart of interim payments due to case professionals for February 2025 fee statements (.5); update chart of all fees paid to professionals since inception of case (.8).	1.30	\$429.00
03/31/25	TND	Gather information on increasing professional fee costs for hearing.	0.40	\$320.00
Task Total:			4.70	\$3,359.00

**025 U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating**

03/18/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding review of preliminary draft of the February 2025 MOR.	0.20	\$175.00
03/19/25	EPK	Review preliminary draft of the February 2025 MOR (.4); email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding comments to same (.2).	0.60	\$525.00
03/20/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding final authority to file February 2025 MOR.	0.10	\$87.50
03/21/25	EPK	Coordinate with J. Harrison regarding filing and service of the February 2025 MOR (.1); follow up with A. Bardos of RCBO regarding filing authority for same and as-filed copy of the MOR (.2).	0.30	\$262.50
03/21/25	JCH	File February monthly operating report and circulate filed copy of same.	0.50	\$165.00
03/25/25	EPK	Email correspondence with D. Flanagan of VeraCruz and K. Farrar regarding February 2025 MOR supplement to be submitted to BRG.	0.20	\$175.00
03/31/25	MDL	Evaluate documents to be produced in connection with February 2025 monthly operating report.	0.10	\$87.50
Task Total:			2.00	\$1,477.50

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**026 Unsecured Creditor Issues/Communications/Meetings**

03/03/25	MDL	Discussion with J. Prol and G. Albert following status conference regarding information sharing and proposed stipulations.	0.30	\$262.50
03/14/25	SJM	Review issues regarding litigation claim and email to counsel for claimant (.7); telephone call with counsel for claimant (.2).	0.90	\$787.50
Task Total:			1.20	\$1,050.00

**027 Real Estate and Real Property Issues**

03/04/25	JRBL	Telephone conference from P. Bongiovanni regarding strategy related to sinkhole issue.	0.60	\$825.00
03/11/25	SJM	Multiple emails with client and president of CCCEB regarding finalizing stipulation for extension of time to assume or reject (.4); work on finalizing motion to extend (1.8).	2.20	\$1,925.00
Task Total:			2.80	\$2,750.00

**029 Non-tort Proofs of Claim**

03/02/25	EPK	Review stipulation regarding withdrawal of OPF claim (.1); evaluate effect of same on claims pool (.1).	0.20	\$175.00
Task Total:			0.20	\$175.00

**031 Insurance Issues (coverage, includes adversary proceeding)**

03/03/25	EPM	Serve document productions on insurers (.5); discussions and analysis regarding same including preparation of productions and analysis of confidentiality agreements (1.0); revise joint discovery status report to Court (5.3).	6.80	\$5,712.00
03/03/25	ERR	Edit joint statement including edits from insurers.	1.00	\$1,100.00
03/03/25	JCH	Finalize Status Report update in District Court case.	0.50	\$165.00

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03/03/25	KAFA	Management of productions to insurers (1.4); update document production log (1.1); communications with E. Mazzocco and M. Schachte regarding same (.6).	3.10	\$1,395.00
03/03/25	MR	Revise joint status report to Court and incorporate multiple rounds of edits to same from insurers, in insurance coverage action.	2.10	\$1,669.50
03/05/25	MCM	Review email correspondence from insurer counsel regarding information in proofs of claim and Debtors' analysis of same (.4); review documentation and circulate internally (.4).	0.80	\$740.00
03/06/25	AMUE	Analyze possible insurer contribution toward plan (.7) and review email communications regarding same (.6).	1.30	\$1,365.00
03/06/25	ERR	Telephone call T. Gallagher (mediator) regarding settlement issues regarding insurers.	0.70	\$770.00
03/06/25	ERR	Review production to insurers regarding list of claims and dates.	0.60	\$660.00
03/06/25	KAFA	Update Insurers Master Claims Matrix.	4.70	\$2,115.00
03/06/25	MCM	Email correspondence with counsel for insurers regarding balloting and solicitation issues.	0.40	\$370.00
03/06/25	MCM	Prepare revised claims analysis matrix for production to insurer counsel including requested information and circulate to Foley team for review.	1.10	\$1,017.50
03/06/25	MR	Communicate with counsel for Pacific entities regarding meet and confer request in insurance coverage action.	0.10	\$79.50
03/07/25	AMUE	Review multiple communications received from counsel for Chubb regarding discovery (.7) and provide advice to Foley insurance team regarding same (.5).	1.20	\$1,260.00
03/07/25	EPM	Review insurer requests for documents related to prior abuse claims.	0.80	\$672.00
03/07/25	ERR	Telephone call with M. Plevin regarding settlement and insurer participation.	0.30	\$330.00
03/07/25	ERR	Review status of production in light of demand from Chubb.	0.50	\$550.00

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03/07/25	ERR	Review responses to policy limits demands.	0.40	\$440.00
03/07/25	ERR	Analyze final chart of pending claims demographics.	0.50	\$550.00
03/07/25	KAFA	Update Insurers Master Claims Matrix.	1.10	\$495.00
03/07/25	MCM	Analyze issues concerning production of revised claims matrix to insurer parties.	0.40	\$370.00
03/07/25	MR	Telephone communication with counsel for Pacific entities regarding outstanding discovery items and meet and confer request (.2); communicate with E. Mazzocco regarding insurers' document requests and follow-up from previous meet and confer discussion in insurance coverage action (.2).	0.40	\$318.00
03/09/25	EPM	Review policy demand responses from claimants' counsel (.2); review temporary protective order governing prior abuse cases (.3); draft summary of same (.5).	1.00	\$840.00
03/09/25	MRL	Email correspondence with E. Mazzocco regarding document review of depositions in Clergy III cases.	0.20	\$135.00
03/10/25	EPM	Conference call with E. Ridley regarding insurer request for documents related to prior abuse cases (.6); correspondence with case team regarding same (.3); further analysis of temporary protective order for prior abuse cases (.4).	1.30	\$1,092.00
03/10/25	ERR	Review response to policy limits demand.	0.70	\$770.00
03/10/25	ERR	Review status of discovery production and response to Chubb request for Clergy III deposition transcripts.	0.80	\$880.00
03/10/25	KAFA	Analysis of NetDocs, Q drive and JCCP004359 Court Docket for 2004-2006 protective order.	1.40	\$630.00
03/11/25	EPK	Evaluate shared insurance issues relating to schools.	0.20	\$175.00
03/11/25	EPM	Discussions related to policy demand responses (.3); discussions related to document review and production (.3).	0.60	\$504.00
03/11/25	MCM	Email correspondence with counsel for insurers regarding solicitation issues.	0.30	\$277.50

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03/11/25	MDL	Evaluate potential production of confidential materials.	0.20	\$175.00
03/12/25	EPK	Email correspondence with R. Manns of NRF regarding bankruptcy-related insurance issues involving RCWC.	0.10	\$87.50
03/12/25	ERR	Telephone call RCWC regarding status of underlying cases.	0.50	\$550.00
03/13/25	AAWT	Confer with assigning attorney regarding discovery strategy for insurance matter.	0.40	\$210.00
03/13/25	EPM	Prepare for meet and confer with Pacific entities (.9); meet and confer with Pacific entities (.5).	1.40	\$1,176.00
03/13/25	ERR	Telephone call with M. Plevin regarding issues related to disclosure and settlement contribution by insurers.	0.50	\$550.00
03/13/25	ERR	Review insurer responses to individual policy limit demands.	0.40	\$440.00
03/13/25	MR	Strategy telephone call with E. Mazzocco regarding discovery in insurance coverage action (.3); prepare for meet and confer call with counsel for Pacific entities (.7); attend meet and confer call with counsel for Pacific entities (.2); confer with E. Mazzocco following meet and confer call (.2).	1.40	\$1,113.00
03/14/25	ERR	Telephone call M. Plevin regarding settlement status.	0.50	\$550.00
03/14/25	JCH	Prepare shell for Debtor's responses and objections to CNA's requests for production.	0.80	\$264.00
03/14/25	MR	Strategize regarding completion of outstanding discovery tasks in insurance coverage action.	0.50	\$397.50
03/17/25	EPM	Provide direction regarding document review.	0.50	\$420.00
03/17/25	ERR	Provide email report to client regarding status of claims against insurers.	0.50	\$550.00
03/17/25	MR	Draft responses to CNA's requests for production in insurance coverage action.	1.10	\$874.50
03/18/25	AAWT	Review deposition transcripts, identifying relevant testimony and capturing relevant portions in work product chart for insurance matter.	3.90	\$2,047.50

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03/18/25	MR	Draft responses to CNA's requests for production in insurance coverage action.	4.30	\$3,418.50
03/19/25	AAWT	Confer with assigning attorney regarding research strategy for insurance matter (.3); review deposition transcripts, identifying relevant testimony and capturing relevant portions in chart (.7).	1.00	\$525.00
03/19/25	EPM	Prepare outgoing document productions (.5); direct document review (.5); analysis and summary of open case tasks (.6); respond to insurer requests for consent to share policy limits (.3); analysis of protective orders governing document productions (.7).	2.60	\$2,184.00
03/19/25	ERR	Review response to US Fire letter regarding policy limits information.	0.40	\$440.00
03/19/25	MDL	Evaluate confidentiality issues surrounding Clergy III discovery.	0.10	\$87.50
03/20/25	EPM	Draft response to US Fire regarding consent to share policy limits (.8); prepare document production (.4).	1.20	\$1,008.00
03/20/25	ERR	Edit response to inquiry regarding request for limits from US Fire.	0.50	\$550.00
03/20/25	MR	Continue drafting responses to CNA's requests for production in insurance coverage action.	2.20	\$1,749.00
03/21/25	EPM	Review draft responses to document requests (1.1); conference call with M. Roberts regarding same (.5).	1.60	\$1,344.00
03/21/25	ERR	Review issues regarding response to Travelers response to policy limits request.	0.40	\$440.00
03/21/25	MR	Strategy call with E. Mazzocco regarding responses to CNA's requests for production in insurance coverage action; (.5) revise draft of same (1.4).	1.90	\$1,510.50
03/24/25	AMUE	Review multiple (5+) emails from counsel for insurers regarding demands for coverage received from claimants (.7) and provide advice regarding response to insurers (.5).	1.20	\$1,260.00

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03/24/25	EPM	Review confidential documents subject to insurer document requests (.7); review insurer requests to share policy limits in response to claimant policy demands (.3); conference call with E. Ridley regarding document production requests (.3); prepare summary and update regarding (1.0); conference call with A. Uetz regarding status of discovery (.6); prepare production of proofs of claim (.3).	3.20	\$2,688.00
03/24/25	ERR	Review communications from U.S. Fire, CNA and Continental regarding policy limits demand issues and responses.	1.20	\$1,320.00
03/24/25	ERR	Begin to review response to request for production by CNA.	0.80	\$880.00
03/25/25	EPM	Draft responses to insurer requests for consent to share policy limits with claimants (1.1); draft stipulation regarding forthcoming document production (.5).	1.60	\$1,344.00
03/25/25	ERR	Review response to insurers regarding policy limits requests.	0.60	\$660.00
03/25/25	ERR	Review issues regarding settlement with mediator and insurers.	0.50	\$550.00
03/26/25	AAWT	Review deposition transcripts, identifying relevant testimony and capturing relevant portions in chart for insurance discovery matters.	1.90	\$997.50
03/26/25	AMUE	Review open discovery requests from insurers (1.1) and provide advice to E. Mazzacco regarding same (.5); review emails received from counsel for Chubb regarding request for documents (.7).	2.30	\$2,415.00
03/26/25	AMUE	Review emails received from M. Plevin regarding claimant demands (.4); draft revisions to privileged document concerning discovery (.9).	1.30	\$1,365.00
03/26/25	EPM	Draft stipulation regarding document production (2.9); revise exhibit to stipulation (.5); conference call with A. Uetz regarding stipulation (.4).	3.80	\$3,192.00
03/26/25	ERR	Review settlement position of CNA.	0.50	\$550.00
03/26/25	ERR	Review stipulation regarding production of documents regarding Clergy III.	0.40	\$440.00

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03/26/25	KAFA	Review documents in Relativity for Clergy III trial transcripts (1.3); review Thatcher and John Doe 44 dockets for motions to seal documents and orders of the trial judge (.9).	2.20	\$990.00
03/27/25	AAWT	Review deposition transcripts, identifying relevant testimony and capturing relevant portions in chart for insurance discovery matters.	3.80	\$1,995.00
03/27/25	AMUE	Review email received from M. Plevin (.3) and analyze privileged issue regarding same (.5).	0.80	\$840.00
03/27/25	EPM	Revise stipulation related to document productions (.7); review documents slated for production (1.5); draft correspondence to insurer counsel regarding forthcoming document production (.5).	2.70	\$2,268.00
03/27/25	ERR	Review M. Kemner report regarding privileged issue.	0.40	\$440.00
03/27/25	ERR	Review response to M. Plevin regarding settlement position.	0.50	\$550.00
03/27/25	MDL	Strategize with A. Uetz regarding confidentiality issue relating to Clergy III discovery documents.	0.40	\$350.00
03/28/25	AMUE	Analyze issue concerning production of documents to insurers (.5) and provide direction to E. Mazzocco regarding same (.3).	0.80	\$840.00
03/28/25	EPM	Analysis of confidentiality terms pertaining to document production.	0.40	\$336.00
03/28/25	ERR	Telephone call with R. Manns and client representatives regarding status of tenders of schools.	0.50	\$550.00
03/31/25	AAWT	Review deposition transcripts, identifying relevant testimony and capturing relevant portions in chart for insurance matters.	1.70	\$892.50
03/31/25	EPM	Review confidentiality terms related to document production (.3); respond to requests from insurers for consent to disclose policy limits to claimants (.5).	0.80	\$672.00
03/31/25	ERR	Telephone call with T. Gallagher (mediator) regarding status and strategy regarding insurance (x 2).	0.80	\$880.00

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03/31/25	ERR	Review status of response to CNA discovery.	0.50	\$550.00
03/31/25	ERR	Report status of insurance negotiations to client.	0.50	\$550.00
03/31/25	ERR	Begin review of responses to CNA written discovery.	0.50	\$550.00
03/31/25	JCH	Calendar extended response deadline to CNA requests for production.	0.20	\$66.00
03/31/25	KAFA	Review Clergy III, Thatcher and John Doe 44 dockets and Sabraw orders for motions or orders related to confidentiality and/or sealing documents.	2.10	\$945.00
03/31/25	MDL	Correspondence with A. Wyatt (Dentons) regarding responses to Travelers request for authorization to disclose policy limits.	0.10	\$87.50
03/31/25	MDL	Evaluate production of Clergy III discovery materials.	0.20	\$175.00

Task Total: 103.40 \$82,297.00

**032 Rule 2004 Motions/Discovery/Subpoenas**

03/02/25	JMT	Revise discovery requests to Committee.	1.20	\$1,050.00
03/03/25	KAFA	Prepare client documents for production to Committee.	0.40	\$180.00
03/04/25	KAFA	Address access issues related to last production of client documents to the Committee.	0.30	\$135.00
03/21/25	KAFA	Preparation of documents for production.	2.30	\$1,035.00
03/24/25	KAFA	Preparation of client documents for production to Committee.	0.30	\$135.00
03/26/25	JCH	Prepare chart listing deposition transcripts produced, date of deposition and number of exhibits provided.	1.00	\$330.00
03/26/25	KAFA	Preparation of client documents for production to Committee.	0.50	\$225.00
03/27/25	JCH	Add claimant names to chart listing deposition transcripts.	0.50	\$165.00

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03/27/25	JMT	Confer with M. Moore regarding discovery issues (.2); edit draft discovery requests (1.0).	1.20	\$1,050.00
03/31/25	KAFA	Finalize production of client documents to Committee.	1.00	\$450.00
Task Total:			8.70	\$4,755.00

**034 Other Motion Practice**

03/03/25	JCH	Prepare (.4) and file (.1) certificate of no objection to Debtor's fourth motion to extend removal deadline.	0.50	\$165.00
03/03/25	SJM	Prepare revised order on motion to extend removal deadline (.2); email to Committee regarding same (.2); revise CNO to address Committee reservation of rights (.3).	0.70	\$612.50
03/21/25	MDL	Telephone conference with T. Dolcourt regarding completion of drafts of motion to dismiss and motion to amend interim compensation procedures.	0.40	\$350.00
03/21/25	TND	Call with M. Lee regarding motion to dismiss updates.	0.30	\$240.00
03/24/25	TND	Revise motion to dismiss to reflect new facts and updated information.	2.70	\$2,160.00
03/28/25	SJM	Finalize CNO and proposed order on motion to extend time to assume or reject lease.	0.50	\$437.50
Task Total:			5.10	\$3,965.00

**035 General Counsel Matters**

03/05/25	LFG	Prepare for (.2) and participate in (.2) call with R. Medieros regarding safe environments audit and updates to website and policies.	0.40	\$480.00
03/12/25	LFG	Annotate changes to RCBO website.	1.30	\$1,560.00
03/12/25	LPM	Analyze RCBO website regarding RCBO policy on abuse.	1.20	\$978.00

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03/12/25	LPM	Conference call with S. Martinez to discuss construction contracting matters and revisions to form agreements.	0.80	\$652.00
03/25/25	LFG	Work with L. Mikeworth on preparation of form construction agreement.	0.20	\$240.00
03/25/25	LPM	Correspondence with client regarding construction contract form preparation.	0.50	\$407.50
03/26/25	LPM	Attend call with client to discuss construction contract form preparation.	0.90	\$733.50
03/27/25	LFG	Communications with L. Mikeworth on advancement of form construction contract project.	0.30	\$360.00
03/27/25	LPM	Prepare form construction contracts for client review.	0.40	\$326.00
03/27/25	MTKS	Revise construction forms A102 and A103.	0.30	\$172.50
03/28/25	LPM	Prepare form construction contracts.	0.50	\$407.50
03/28/25	MTKS	Draft A101 construction form template.	1.00	\$575.00
03/28/25	MTKS	Draft A201 construction form template.	1.00	\$575.00
03/31/25	JS	Revise A102 and A201 construction forms.	0.20	\$42.00
03/31/25	MTKS	Draft A201 construction form.	0.70	\$402.50
Task Total:			9.70	\$7,911.50

**037 Financing**

03/06/25	MDL	Strategize regarding potential collateral for RCC loan and securing appraisals for properties.	0.60	\$525.00
03/06/25	MDL	Email exchange with R. Manns (Norton Rose Fulbright) regarding potential collateral for RCC loan.	0.10	\$87.50
03/07/25	HMF	Conference with M. Lee regarding status of bankruptcy exit financing.	0.20	\$220.00
03/07/25	MDL	Telephone conference with D. Flanagan (VeraCruz) regarding plan funding issues and RCC collateral issues.	0.60	\$525.00

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03/07/25	MDL	Evaluate questions regarding value of RCC collateral.	0.40	\$350.00
03/07/25	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) regarding collateral for RCC loan.	0.50	\$437.50
03/07/25	MDL	Strategize with H. Furlong for RCC exit facility negotiations.	0.20	\$175.00
03/10/25	HMF	Participate in conference call regarding RCC loan and collateral.	1.10	\$1,210.00
03/10/25	MDL	Draft list of properties potentially to be used as collateral for RCC loan.	0.50	\$437.50
03/10/25	MDL	Telephone conference with RCC personnel and counsel regarding collateral schedule for exit facility.	1.20	\$1,050.00
03/10/25	SJM	Call regarding potential collateral for RCC exit financing loan.	1.10	\$962.50
Task Total:			6.50	\$5,980.00

**038 Mediation**

03/03/25	MDL	Telephone conference with S. Warren (O'Melveny Myers) regarding confidential mediation matters.	0.10	\$87.50
03/05/25	MRL	Confer with M. Moore regarding an update to the Rochester diocese case.	0.20	\$135.00
03/06/25	EPM	Calls and email correspondence with M. Moore and K. Farrar regarding claims spreadsheet revisions for confidential mediation (.8); analysis of claims spreadsheet (.4).	1.20	\$1,008.00
03/07/25	EPM	Revise claims spreadsheet for use in confidential mediation.	0.70	\$588.00
03/09/25	MDL	Email correspondence with S. Warren (O'Melveny Myers) regarding confidential mediation issues.	0.10	\$87.50
03/10/25	MDL	Strategize with A. Uetz regarding plan and mediation (.8); follow up on same (.2).	1.00	\$875.00
03/11/25	MDL	Telephone conference with S. Warren (O'Melveny & Myers) regarding confidential mediation subjects.	0.60	\$525.00

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03/13/25	MDL	Strategize with Foley team regarding negotiations with insurers over confidential mediation subject.	0.20	\$175.00
03/13/25	MDL	Telephone conference with M. Plevin (Plevin Turner) and Foley team regarding balloting issue and confidential mediation subject.	0.80	\$700.00

Task Total:	4.90	\$4,181.00
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Services Total:	545.10	\$435,530.50
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**Professional Services Summary**

Service Provider	Initials	Title	Hours	Rate	Amount
Alexander A. Witz	AAWT	Associate	12.70	\$525.00	\$6,667.50
Joseph S. Harper	JSH	Associate	4.00	\$800.00	\$3,200.00
Mason Roberts	MR	Associate	14.00	\$795.00	\$11,130.00
Mary Rofaeil	MRL	Associate	44.50	\$675.00	\$30,037.50
Mikaela R. Mitcham	MRM	Associate	5.60	\$675.00	\$3,780.00
Matthew Kass	MTKS	Associate	3.00	\$575.00	\$1,725.00
Michael W. Berg	MWBE	Associate	4.60	\$600.00	\$2,760.00
Nora McGuffey	NMCG	Associate	2.70	\$700.00	\$1,890.00
Shane J. Moses	SJM	Of Counsel	74.90	\$875.00	\$65,537.50
Brittnie M. Werner	BMWE	Paralegal	1.10	\$290.00	\$319.00
Janelle C. Harrison	JCH	Paralegal	29.70	\$330.00	\$9,801.00
Kerry A. Farrar	KAFA	Paralegal	57.80	\$450.00	\$26,010.00
Ann Marie Uetz	AMUE	Partner	65.70	\$1,050.00	\$68,985.00
Emil P. Khatchatourian	EPK	Partner	15.30	\$875.00	\$13,387.50
Eileen R. Ridley	ERR	Partner	19.90	\$1,100.00	\$21,890.00
Geoffrey S. Goodman	GSG	Partner	14.50	\$1,050.00	\$15,225.00
Heidi M. Furlong	HMF	Partner	1.30	\$1,100.00	\$1,430.00
Jonathan Michael Thomas	JMT	Partner	2.40	\$875.00	\$2,100.00
Jeff R. Blease	JRBL	Partner	0.60	\$1,375.00	\$825.00
Lisa F. Glahn	LFG	Partner	2.20	\$1,200.00	\$2,640.00
Mark C. Moore	MCM	Partner	46.20	\$925.00	\$42,735.00
Matthew D. Lee	MDL	Partner	52.00	\$875.00	\$45,500.00
Jacob Stamm	JS	Project Assistant	0.20	\$210.00	\$42.00
Alan R. Ouellette	AROU	Senior Counsel	2.90	\$875.00	\$2,537.50
Elizabeth P. Mazzocco	EPM	Senior Counsel	34.10	\$840.00	\$28,644.00
Laura P. Mikeworth	LPM	Senior Counsel	4.30	\$815.00	\$3,504.50

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Mikle S-K Jew	MSKJ	Senior Counsel	4.30	\$825.00	\$3,547.50
Tamar N. Dolcourt	TND	Special Counsel	24.60	\$800.00	\$19,680.00
<b>Totals</b>			<b>545.10</b>		<b>\$435,530.50</b>

**Expenses Incurred**

<b>Description</b>	<b>Amount</b>
Depositions / Transcripts, Exams	\$333.05
Electronic Legal Research Services	\$163.78
LSS - eDiscovery Services	\$3,900.00
Other Expenses	\$54.50
<b>Expenses Incurred Total</b>	<b>\$4,451.33</b>

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

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## Expense Detail

### Depositions / Transcripts, Exams

Date	Initials	Description	Amount
03/12/25	JRBL	Jilio-Ryan Hunter & Olsen, Inc - Reporter's Transcript of Proceedings - Status Conference - 03/12/25.	\$333.05

### Electronic Legal Research Services

Date	Initials	Description	Amount
03/31/25	SMKO	Docket Report. SEARCH ACCESS CHARGE. Westlaw.	\$163.78

### LSS - eDiscovery Services

Date	Initials	Description	Amount
03/31/25	JRBL	LSS - eDiscovery Services.	\$3,900.00

### Other Expenses

Date	Initials	Description	Amount
03/27/25	NFAR	Miscellaneous--VENDOR: U.S. BANK 03/27/25 Document retrieval - court - Kerry Farrar -.	\$54.50

Expense Total:	<hr/>	\$4,451.33
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