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Counsel for the Official Committee of Unsecured Creditors

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

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

**MONTHLY PROFESSIONAL FEE
STATEMENT FOR BURNS BAIR LLP
[MARCH 2025]**

TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:

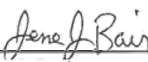
1 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP (“**Burns Bair**”), special insurance
2 counsel to The Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman
3 Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement
4 for the Period of March 1, 2025 through March 31, 2025 (the “**Monthly Fee Statement**”). Pursuant
5 to the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses
6 of Professionals [Dkt. 170] (the “**Interim Fee Order**”)¹ entered by the Court on June 23, 2023,
7 the total legal fees and costs expended by Burns Bair on account of the Committee is as follows:

Period	Fees	Expenses	Total
March 1, 2025 through March 31, 2025	\$42,754.00	\$2,802.29	\$45,556.29
Net Total Allowed Payments this Statement Period: (80% of Fees and 100% of Costs)	\$34,203.20	\$2,802.29	\$37,005.49

12 The itemized billing statement for the fees and costs billed is attached hereto as **Exhibit**
13 **A**. Notice Parties have ten (10) days from the date of service of this Monthly Fee Statement to
14 file an objection thereto. If no objection is filed, Burns Bair may file a certificate of no objection
15 (or if an Objection was timely served, a certificate of partial objection) with the Court after which
16 the Debtor, without further order of the Court, shall pay Burns Bair an amount equal to the lesser
17 of: (1) 80% of the fees and 100% of the expenses requested in the Monthly Fee Statement, and
18 (2) if an Objection was served, 80% of the fees and 100% of the expenses to which there was no
19 Objection no later than five (5) business days after the filing of the relevant certificate.

20 Dated: April 30, 2025

BURNS BAIR LLP

21 By: 
22 Jesse J. Bair
23 *Special Insurance Counsel for the Official*
24 *Committee of Unsecured Creditors*

25
26
27
28 ¹ Capitalized terms not otherwise defined shall have the meaning ascribed to them in the Interim Fee Order.

EXHIBIT A

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 4/28/2025

Bill # : 01925

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/20/2025	Timothy Burns	Participate in state court counsel meeting re insurance strategy (1.6);	1.60	\$1,792.00
3/20/2025	Jesse Bair	Prepare for state court counsel meeting (.1); participate in portion of state court counsel meeting for insurance purposes re insurance strategy and Plan issues (1.5);	1.60	\$1,440.00
3/21/2025	Jesse Bair	Prepare for Committee meeting (.1); participate in Committee meeting for insurance purposes re litigation, Plan, and mediation issues (1.0);	1.10	\$990.00
3/28/2025	Timothy Burns	Participate in state court counsel meeting re insurance Plan structure (1.3);	1.30	\$1,456.00
Totals for Committee Meetings			5.60	\$5,678.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/27/2025	Brenda Horn-Edwards	Draft monthly professional fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
3/27/2025	Jesse Bair	Correspond with B. Horn-Edwards re preparing monthly fee statement (.1);	0.10	\$90.00
3/28/2025	Jesse Bair	Edit and finalize monthly fee statement and correspond with KBK re same (.1);	0.10	\$90.00
Totals for Fee Applications			0.50	\$282.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/3/2025	Timothy Burns	Participate in status hearing for insurance purposes (.5);	0.50	\$560.00
3/3/2025	Nathan Kuenzi	Participate in status conference for insurance purposes (.5);	0.50	\$275.00
Totals for Hearings			1.00	\$835.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/1/2025	Jesse Bair	Review Travelers' response to Boicourt letters (.1);	0.10	\$90.00
3/3/2025	Timothy Burns	Conference with J. Bair re outcome of status hearing (.1);	0.10	\$112.00
3/3/2025	Nathan Kuenzi	Prepare for zoom hearing / status conference (.8);	0.80	\$440.00
3/3/2025	Nathan Kuenzi	Review and respond to correspondence with state court counsel re reinsurance questions (.3);	0.30	\$165.00
3/3/2025	Nathan Kuenzi	Review Rule 2004 briefing and materials produced by the insurers re reinsurance (.4);	0.40	\$220.00
3/3/2025	Jesse Bair	Review and respond to correspondence with state court counsel re reinsurance issue (.1);	0.10	\$90.00
3/3/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re disclosure statement issues (.2);	0.20	\$224.00
3/3/2025	Timothy Burns	Participate in call with J. Bair re ongoing mediation negotiations (.2);	0.20	\$224.00
3/3/2025	Jesse Bair	Participate in call with T. Burns re ongoing mediation negotiations (.2);	0.20	\$180.00
3/3/2025	Jesse Bair	Participate in conference with T. Burns re outcome of status conference (.1);	0.10	\$90.00
3/4/2025	Nathan Kuenzi	Supplemental analysis re CIGA issues and exposure in connection with RCBO claims (.4);	0.40	\$220.00
3/4/2025	Nathan Kuenzi	Review and respond to correspondence with Travelers re Boicourt letter issues (.2);	0.20	\$110.00
3/4/2025	Nathan Kuenzi	Review insurance Plan terms in connection with ongoing discussions re potential modifications to same (1.5);	1.50	\$825.00
3/4/2025	Karen Dempksi	Docket/calendar new dates for disclosure statement (1);	0.10	\$34.00
3/5/2025	Jesse Bair	Review joint status reports in district court insurance action (.2);	0.20	\$180.00
3/5/2025	Jesse Bair	Review and respond to correspondence with state court counsel and BB team re CIGA issues (.1);	0.10	\$90.00

3/5/2025	Nathan Kuenzi	Review and respond to correspondence with state court counsel re CIGA obligations (.3);	0.30	\$165.00
3/6/2025	Nathan Kuenzi	Review CNA's response to Boicourt letters (.2);	0.20	\$110.00
3/6/2025	Jesse Bair	Review agenda for upcoming Committee meeting and related correspondence with state court counsel re meeting with BRG (.1);	0.10	\$90.00
3/7/2025	Jesse Bair	Review Westport's responses to Boicourt letters (.1); review correspondence with T. Burns re same (.1);	0.20	\$180.00
3/8/2025	Jesse Bair	Review state court counsels' reply to Westport's Boicourt letter response (.1);	0.10	\$90.00
3/9/2025	Jesse Bair	Review B. Wiesenbergs correspondence re case developments and insurance issues (.1);	0.10	\$90.00
3/10/2025	Nathan Kuenzi	Review Boicourt letters sent on behalf of claimants to Westport and Westport's responses to same (.3);	0.30	\$165.00
3/10/2025	Timothy Burns	Participate in call with state court counsel re insurance strategy (.2); participate in conference with Lowenstein re same (.1); participate in conference with J. Bair re same (.2);	0.50	\$560.00
3/10/2025	Jesse Bair	Participate in conference with T. Burns re case insurance strategy and next-steps (.2);	0.20	\$180.00
3/10/2025	Jesse Bair	Review correspondence with certain insurers re Boicourt letters (.1); review and respond to questions re additional insured coverage (.2);	0.30	\$270.00
3/11/2025	Jesse Bair	Analysis re potential revisions to Plan insurance assignment (.1);	0.10	\$90.00
3/13/2025	Jesse Bair	Review correspondence with Committee professionals and state court counsel re Committee insurance strategy and related meeting re same (.2);	0.20	\$180.00
3/14/2025	Timothy Burns	Review insurers' responses to Boicourt letters (.2); review and respond to correspondence with state court counsel re same (.2);	0.40	\$448.00
3/14/2025	Jesse Bair	Review Westport's supplemental response re Boicourt letters (.1);	0.10	\$90.00
3/14/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation issues (.2);	0.20	\$224.00
3/17/2025	Jesse Bair	Brief review of third amended Plan (.1); participate in call with state court counsel re ongoing mediation negotiations (.2);	0.30	\$270.00
3/17/2025	Timothy Burns	Begin preparing for upcoming disclosure statement hearing (.1);	0.10	\$112.00

3/17/2025	Timothy Burns	Prepare for insurance strategy meeting with state court counsel (.4); participate in call with state court counsel re same (.2);	0.60	\$672.00
3/17/2025	Timothy Burns	Correspond with N. Kuenzi re the debtor's third amended plan (.1);	0.10	\$112.00
3/17/2025	Timothy Burns	Review and respond to correspondence with state court counsel re insurance strategy and mediation (.1);	0.10	\$112.00
3/18/2025	Timothy Burns	Review correspondence with Lowenstein re the debtor's third amended plan and disclosure statement (.1);	0.10	\$112.00
3/18/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation issues (.2);	0.20	\$224.00
3/18/2025	Timothy Burns	Participate in call with B. Weisenberg re agenda re upcoming insurance strategy meeting (.2);	0.20	\$224.00
3/18/2025	Nathan Kuenzi	Analyze the debtor's third amended Plan for insurance purposes (2.2); draft correspondence to T. Burns summarizing changes from second amended plan (.3);	2.50	\$1,375.00
3/18/2025	Timothy Burns	Review N. Kuenzi correspondence re third amended Plan (.2); brief review of particular portions of Plan (.3);	0.50	\$560.00
3/18/2025	Nathan Kuenzi	Analyze particular Plan insurance issues in preparation for upcoming insurance strategy meeting (.4);	0.40	\$220.00
3/18/2025	Timothy Burns	Participate in call with state court counsel re mediation issues (.2);	0.20	\$224.00
3/18/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re mediation-related meetings (.3);	0.30	\$336.00
3/19/2025	Timothy Burns	Prepare for insurance strategy presentation (1.7);	1.70	\$1,904.00
3/19/2025	Timothy Burns	Review and respond to correspondence with state court counsel re mediation issues (.2); participate in call with B. Weisenberg re same (.2);	0.40	\$448.00
3/19/2025	Timothy Burns	Participate in conference with J. Bair re insurance mediation and litigation strategy (.2);	0.20	\$224.00
3/19/2025	Jesse Bair	Review correspondence with state court counsel and Committee professionals re case insurance strategy and related meeting re same (.1); review carrier exposure assessments in connection with same (.2);	0.30	\$270.00
3/19/2025	Jesse Bair	Participate in conference with T. Burns re insurance mediation and litigation strategy (.2);	0.20	\$180.00

3/19/2025	Timothy Burns	Review and respond to correspondence with state court counsel re insurance strategy (.3);	0.30	\$336.00
3/20/2025	Timothy Burns	Participate in call with state court counsel re Diocesan settlement issues (.2);	0.20	\$224.00
3/20/2025	Timothy Burns	Correspondence regarding mediation-related meeting with debtor (.2);	0.20	\$224.00
3/20/2025	Timothy Burns	Review and edit slide deck for use during state court counsel insurance strategy meeting (1.2);	1.20	\$1,344.00
3/20/2025	Timothy Burns	Review and respond to correspondence with state court counsel re Plan structure issues (.2);	0.20	\$224.00
3/20/2025	Timothy Burns	Conference with mediator re mediation status (.1);	0.10	\$112.00
3/20/2025	Timothy Burns	Analysis re next-steps in light of outcome of state court counsel insurance strategy meeting (.4);	0.40	\$448.00
3/20/2025	Timothy Burns	Participate in call with BRG and Lowenstein re Diocesan settlement issues (.8);	0.80	\$896.00
3/20/2025	Timothy Burns	Review and respond to multiple correspondence with state court counsel re insurance strategy presentation (.4);	0.40	\$448.00
3/22/2025	Timothy Burns	Review correspondence from Travelers re Boicourt letters (.2);	0.20	\$224.00
3/24/2025	Timothy Burns	Review US Fire's response to Boicourt letter with attached letter from Diocese and response from US Fire (.2);	0.20	\$224.00
3/24/2025	Timothy Burns	Review and respond to correspondence with state court counsel re insurance strategy (.3); participate in call with B. Weisenberg and J. Prol re same (.2);	0.50	\$560.00
3/24/2025	Nathan Kuenzi	Begin preparing for upcoming disclosure statement hearing (.2);	0.20	\$110.00
3/24/2025	Jesse Bair	Review correspondence with state court counsel re insurance strategy and Plan meeting (.1);	0.10	\$90.00
3/24/2025	Jesse Bair	Provide instructions to N. Kuenzi re preparations and insurance strategy for upcoming disclosure statement hearing (.2);	0.20	\$180.00
3/25/2025	Timothy Burns	Review and respond to correspondence with state court counsel re insurance plan structure (.2);	0.20	\$224.00
3/25/2025	Nathan Kuenzi	Continue preparing for upcoming disclosure statement hearing (.1);	0.10	\$55.00
3/25/2025	Jesse Bair	Participate in conference with the mediator re ongoing mediation negotiations (.2);	0.20	\$180.00
3/25/2025	Timothy Burns	Attend mediation related conference with debtor counsel (.7);	0.70	\$784.00

3/25/2025	Jesse Bair	Further analysis re insurance issues in connection with upcoming disclosure statement hearing (.1);	0.10	\$90.00
3/25/2025	Timothy Burns	Review LMI's response re Boicourt letters (.1);	0.10	\$112.00
3/25/2025	Timothy Burns	Conference with state court counsel re mediation developments (.1);	0.10	\$112.00
3/25/2025	Timothy Burns	Prepare for mediation related conference with the debtor (.8);	0.80	\$896.00
3/26/2025	Timothy Burns	Review the debtor's third amended disclosure statement (.4) review and respond to J. Bair correspondence re same (.1);	0.50	\$560.00
3/26/2025	Timothy Burns	Review the Committee's objection to Third Amended Disclosure Statement (.3);	0.30	\$336.00
3/26/2025	Jesse Bair	Review the Committee's objection to the debtor's third amended disclosure statement (.3); correspond with BB team re same and insurance strategy for upcoming hearing (.2);	0.50	\$450.00
3/26/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation developments (.2); participate in call with state court counsel re same (.2);	0.40	\$448.00
3/26/2025	Timothy Burns	Review amendments to ballot (.1);	0.10	\$112.00
3/27/2025	Nathan Kuenzi	Outline argument for upcoming disclosure statement hearing (.9);	0.90	\$495.00
3/27/2025	Timothy Burns	Participate in conference with J. Bair re disclosure statement hearing strategy and case mediation developments (.2); participate in call with state court counsel re same (.1);	0.30	\$336.00
3/27/2025	Jesse Bair	Participate in conference with T. Burns re disclosure statement hearing strategy and case mediation developments (.2);	0.20	\$180.00
3/28/2025	Timothy Burns	Prepare for state court counsel meeting re Plan structure (.6);	0.60	\$672.00
3/28/2025	Nathan Kuenzi	Analyze case law, insurance Plan provisions, and disclosure statement revisions in connection with upcoming disclosure statement hearing (1.6);	1.60	\$880.00
3/28/2025	Jesse Bair	Provide instructions to N. Kuenzi re insurance strategy for upcoming disclosure statement hearing (.1);	0.10	\$90.00
3/29/2025	Nathan Kuenzi	Continue drafting oral argument outline for upcoming disclosure statement hearing (1.3);	1.30	\$715.00
3/30/2025	Alexander Castro	Review and analyze email re: bad faith claim splitting research project (.1);	0.10	\$47.00
3/30/2025	Nathan Kuenzi	Continue preparing for upcoming disclosure statement hearing (.8);	0.80	\$440.00

3/31/2025	Timothy Burns	Review Boicourt letter response from Continental (.2);	0.20	\$224.00
3/31/2025	Timothy Burns	Review and revise N. Kuenzi's oral argument outline (.2);	0.20	\$224.00
3/31/2025	Alexander Castro	Research California insurance law re bad faith claims splitting (2.6);	2.60	\$1,222.00
3/31/2025	Nathan Kuenzi	Finish preparing for disclosure statement oral argument, including drafting revised oral argument outline (1.9);	1.90	\$1,045.00
3/31/2025	Timothy Burns	Prepare for disclosure statement hearing (1.6);	1.60	\$1,792.00
3/31/2025	Jesse Bair	Review and edit draft PowerPoint for state court counsel re insurance-related Plan issues (.4);	0.40	\$360.00
3/31/2025	Timothy Burns	Review and analysis of insurance-related plan structure options (1.1); draft memo to file re same (.7);	1.80	\$2,016.00
3/31/2025	Alexander Castro	Draft memo summarizing research re California bad faith claims splitting issues (2.1);	2.10	\$987.00
3/31/2025	Jesse Bair	Review N. Kuenzi insurance oral argument outline for disclosure statement hearing (.1);	0.10	\$90.00
3/31/2025	Timothy Burns	Participate in call with state court counsel re insurance plan structure issues (.3);	0.30	\$336.00
Totals for Insurance Recovery Activities			43.10	\$35,959.00

Total Hours and Fees	50.20	\$42,754.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/26/2025	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
03/26/2025	Travel meal, T. Burns	\$32.78
03/31/2025	Travel meal, N. Kuenzi	\$5.75
03/31/2025	Hotel, N. Kuenzi (2 nights)	\$933.24
03/31/2025	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
03/31/2025	United Airlines, N. Kuenzi	\$846.37
03/31/2025	United Airlines, T. Burns	\$368.52
03/31/2025	Hotel, T. Burns (1 nights)	\$466.62
03/31/2025	Travel meal, N. Kuenzi	\$22.77
03/31/2025	Uber, N. Kuenzi	\$71.23
03/31/2025	Travel meal, T. Burns	\$32.78
03/31/2025	Travel meal, N. Kuenzi	\$6.23
Total Expenses		\$2,802.29

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	4.80	\$470.00	\$2,256.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Jesse Bair	Partner	7.80	\$900.00	\$7,020.00
Karen Dempski	Paralegal	0.10	\$340.00	\$34.00
Nathan Kuenzi	Associate	14.60	\$550.00	\$8,030.00
Timothy Burns	Partner	22.60	\$1,120.00	\$25,312.00

Total Due This Invoice: \$45,556.29