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*Counsel for the Debtor
and Debtor in Possession*

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

**COVER SHEET TO SIXTH INTERIM FEE
APPLICATION OF FOLEY & LARDNER
LLP, AS GENERAL BANKRUPTCY
COUNSEL TO THE DEBTOR, FOR
ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD OF
JANUARY 1, 2025, THROUGH APRIL 30,
2025**

Judge: Hon. William J. Lafferty

Date: August 13, 2025

Time: 10:30 a.m.

Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

Objection Deadline: July 7, 2025

Name of Applicant:	Foley & Lardner LLP
Name of Client:	The Roman Catholic Bishop of Oakland
Time Period covered by this application:	January 1, 2025 – April 30, 2025
Total compensation sought this period: ¹	\$2,442,215.50 ²
Total expenses sought this period: ³	\$20,827.46
Petition date:	May 8, 2023
Retention date:	Effective as of May 8, 2023
Date of order approving employment:	June 15, 2023 [Docket No. 145]
Total fees approved by interim order to date:	\$10,447,495.50 ⁴
Total expenses approved by interim order to date:	\$162,412.16
Total allowed fees paid to date:	\$10,447,495.50
Total allowed expenses paid to date:	\$162,412.16
Blended rate in this application for all attorneys:	\$851.76 ⁵
Blended rate in this application for all timekeepers:	\$804.22 ⁶
Fees sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$1,959,268.40
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$20,827.46
Number of professionals included in this application:	35
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A

¹ Foley & Lardner LLP has agreed to not 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 Interim Application.

² This amount reflects a write-off of \$6,870.00 for five timekeepers who billed under 15 hours during the Interim Fee Period. Foley includes in this Interim Application fees for certain other timekeepers who billed more than 15 hours during the Interim Fee Period for the reasons described, *infra*.

³ Foley & Lardner LLP has agreed to not bill the Debtor *for the expenses* for its attorneys to travel to or from the Bay Area (e.g., airfare and ride share charges) in connection with this Bankruptcy Case, and such amounts are not included in this Interim Application. For the Interim Fee Period, the amount paid by Foley and not sought for reimbursement is \$32,437.00.

⁴ This amount includes the fee reductions agreed to between Foley and the Office of the United States Trustee of \$75,000.00 for Foley's First Interim Fee Application, and \$28,000.00 for Foley's Second Interim Fee Application. This amount includes the fee reductions agreed to between Foley and the Fee Examiner of \$20,355.50 for Foley's Third Interim Fee Application. This amount includes the fee reductions of \$27,619.00 and expense reductions of \$823.19 agreed to between Foley and the Fee Examiner for Foley's Fourth Interim Fee Application. This amount includes the fee reductions of \$27,442.50 and the expense reductions of \$2,330.80 agreed to between Foley and the Fee Examiner for Foley's Fifth Interim Fee Application.

⁵ This amount includes timekeepers whose *de minimis* time has been written off in this Interim Application.

⁶ This amount includes timekeepers whose *de minimis* time has been written off in this Interim Application.

Number of professionals billing fewer than 15 hours to the case during this period:	15 ⁷
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this application using the rates originally disclosed in the retention application:	No
Interim or Final:	Interim

SUMMARY OF MONTHLY FEE STATEMENTS FOR THE INTERIM FEE PERIOD

Date Filed	Period Covered	80% of Fees Requested	Total Fees Incurred	Expenses Requested	Fees Approved	Expenses Approved	Amount Received
02/28/25 (Dkt. No. 1786)	01/01/25 – 01/31/25	\$541,967.20	\$677,459.00	\$4,579.14	\$541,967.20	\$4,579.14	\$546,546.34
03/28/25 (Dkt. No. 1848)	02/01/25 – 02/28/25	\$510,259.20	\$637,824.00	\$7,285.09	\$510,259.20	\$7,285.09	\$517,544.29
04/30/25 (Dkt. No. 1936)	03/01/25 – 03/31/25	\$348,424.40	\$435,530.50	\$4,451.33	\$348,424.40	\$4,451.33	\$352,875.73
06/12/25 (Dkt. No. 2058) ⁸	04/01/25 – 04/30/25	\$558,617.60	\$698,272.00	\$4,511.90	\$558,617.60	\$4,511.90	\$563,129.50
Total		\$1,959,268.40	\$2,449,085.50	\$20,827.46	\$1,959,268.40	\$20,827.46	\$1,980,095.86

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Application and Not Yet Paid: **\$482,9947.10⁹**

⁷ As noted above, Foley & Lardner LLP is not requesting payment of fees related to five timekeepers due to *de minimis* amounts billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$6,870.00 related to said timekeepers. However, Foley requests payment of fees for the remaining timekeepers who billed fewer than 15 hours during the Interim Fee Period, because their expertise is unique and necessary for certain discrete issues in the case (e.g., trusts and estates, real estate, tax matters, financing, corporate governance, insurance, and bankruptcy matters), including several timekeepers who have spent significant time on this case during other fee application periods, or who are continuing their work on the case in future time periods.

⁸ Foley filed its CNO for this fee statement on June 12, 2025 [Docket No. 2058] and expects payment from RCBO shortly. As such, this Application assumes the payment of 80% of the fees and 100% of the expenses has been made.

⁹ This amount reflects the write-off of \$6,870.00 for five timekeepers who billed under 15 hours during the Interim Fee Period, which was not accounted for in the Monthly Fee Statements.

FOLEY & LARDNER LLP SIXTH INTERIM FEE APPLICATION

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I. INTRODUCTION

Foley & Lardner LLP (“Foley” or the “Firm”), as general bankruptcy counsel to The Roman Catholic Bishop of Oakland, a California corporation sole and the debtor and debtor in possession (the “Debtor” or “RCBO”),¹⁰ respectfully submits this fifth interim application for allowance of compensation and reimbursement of actual and necessary expenses (the “Interim Application”) for services performed as general bankruptcy counsel to the Debtor for the period of January 1, 2025 through April 30, 2025 (the “Interim Fee Period”) in the above-captioned Chapter 11 bankruptcy case (the “Bankruptcy Case”).

Foley seeks interim approval of its fees incurred and reimbursement of expenses during the Interim Fee Period totaling **\$2,463,042.96**. This sum represents compensation in the amount of **\$2,442,215.50** for 3,045.30 hours worked by Foley’s professionals for legal services provided to the Debtor in this matter,¹¹ and reimbursement for expenses incurred in the amount of **\$20,827.46**. Foley has received a total of **\$1,980,095.86** in payments for services during the Interim Fee Period, based on its monthly fee statements pursuant to the interim compensation procedures approved by the Court, and therefore now requests the balance of **\$482,947.10** to be paid to the Firm.

This Interim Application is based upon the contents hereof, together with the exhibits, the declaration of Ann Marie Uetz filed concurrently herewith, the pleadings, papers, and records on file in this case, and any evidence or argument the Court may entertain at the time of the hearing on the Interim Application. This Interim Application is submitted considering the United States Department of Justice’s *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the “Large Case Guidelines”). Summary charts complying with the Large Case Guidelines and detailing the amount of fees charged and

¹⁰ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Order.

¹¹ Foley & Lardner LLP is not requesting payment of fees related to six timekeepers due to *de minimis* amounts billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$6,870.00 related to said timekeepers, and the amounts set forth here reflect this write-off. However, Foley requests payment of fees for the remaining timekeepers who billed fewer than 15 hours during the Interim Fee Period, because their expertise is unique and necessary for certain discrete issues in the case (*e.g.*, trusts and estates, real estate, tax matters, corporate governance, insurance, and bankruptcy matters), including several timekeepers who have spent significant time on this case during other interim periods, or who are continuing their work on the case in future time periods.

hours worked by each of the Firm’s professionals and paraprofessionals during the Interim Fee Period are attached hereto as **Exhibit B** through **Exhibit F**.

II. BACKGROUND

A. **General Background**

On May 8, 2023 (the “Petition Date”), the Debtor filed its voluntary Chapter 11 petition commencing the Bankruptcy Case. The Debtor continues to operate its ministry and manage its assets and properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in this Bankruptcy Case.

On May 23, 2023, the Office of the United States Trustee (the “US Trustee”) filed its notice of appointment of an Official Committee of Unsecured Creditors (the “Committee”) [Docket No. 58].

The Debtor is a corporation sole organized under the laws of the State of California. The Debtor conducts its civil affairs under the laws of the State of California and the United States of America and in accordance with the Code of Canon Law, the ecclesiastical law of the Roman Catholic Church. Additional information regarding the Debtor, its mission, ministries, and operations, and the events and circumstances preceding the Petition Date, is set forth in the *Declaration of Charles Moore, Managing Director of Alvarez & Marsal North America, LLC, Proposed Restructuring Advisor to the Roman Catholic Bishop of Oakland, in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 19], which is incorporated herein by reference.

B. **Employment of Foley**

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* [Docket. No. 60] (the “Retention Application”). The Court approved the Retention Application on June 15, 2023, entering the *Order Approving 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* [Docket No. 145] (the “Foley Retention Order”). A copy of the Foley Retention Order is attached hereto as **Exhibit A**.

1 **C. Summary of Case Status and Developments**

2 During the Interim Fee Period covered by this Interim Application, the Debtor's efforts were
3 focused on its goal of presenting a plan of reorganization that will (a) ensure a fair and equitable outcome
4 for survivors of sexual abuse, and (b) allow the Debtor to stabilize its finances, continue its mission to
5 serve the needs of the faithful within the Diocese of Oakland, and continue to provide services to
6 underserved people and groups in the East Bay. This focus included seeking and obtaining approval of its
7 disclosure statement (as amended, the "Disclosure Statement") in support of its plan of reorganization (as
8 amended, the "Plan"), which included defending the Committee's multiple objections to said approval,
9 continued efforts to reach resolution with its historical insurers (the "Insurers") and the Committee through
10 mediation, continuing to respond to a barrage of litigation from the Committee in response to the Debtor's
11 proposed Plan, and undertaking responses to the Committee's extensive discovery regarding Plan
12 confirmation. Each of these areas is discussed in more detail below.

13 **I. Plan of Reorganization**

14 The Debtor's primary focus during the interim period, and therefore much of Foley's work, was
15 on moving forward toward confirmation of its Plan, which the Debtor strongly believes is fair and
16 equitable to all creditors, including abuse survivors. On November 8, 2024, the Debtor filed *Debtor's Plan*
17 *of Reorganization* [Docket No. 1444] (the "Original Plan") and accompanying *Disclosure Statement for*
18 *the Debtor's Plan of Reorganization* [Docket No. 1445] (the "Original Disclosure Statement"). The
19 Original Plan reflected extensive work toward the Debtor's goal of filing a plan that provides for fair and
20 equitable treatment of survivors of abuse and allows the Debtor to continue its critical mission of serving
21 its parishioners and underserved persons and groups in the East Bay. On November 13, 2024, the Debtor
22 filed *Motion for Order (I) Approving Disclosure Statement; and (II) Establishing Procedures for Plan*
23 *Solicitation, Notice, and Balloting* [Docket No. 1453] (the "Approval Motion").

24 The Committee objected to approval of the Disclosure Statement on multiple bases, raising at least
25 nineteen separate specific objections to the Original Disclosure Statement [Docket No. 1518]. The Debtor
26 filed its replies to the Committee and US Trustee objections on December 16, 2024, each of which required
27 additional research and analysis to address the issues raised in the objections [Docket Nos. 1540, 1541].
28

1 On December 18, 2024, the Bankruptcy Court conducted an initial hearing on the Approval Motion and
2 Original Disclosure Statement and related matters. At the hearing on December 16, the Court set a further
3 Disclosure Statement hearing for January 16, 2025.

4 The Debtor filed an amended Plan and Disclosure Statement on January 3, 2025 [Docket Nos.
5 1594, 1595], and the Bankruptcy Court held additional hearings on the amended Plan and Disclosure
6 Statement on January 16, 21, and 30, 2025. Following the hearing on January 30, 2025, the Bankruptcy
7 Court, at the Debtor's request, set a further hearing for March 3, 2025, and directed the Debtor to file a
8 further amended Plan and Disclosure Statement not later than February 18, 2025. The Debtor filed a
9 further amended Plan and Disclosure Statement on February 18, 2025 [Docket Nos. 1757, 1763]. Based
10 on the Committee's objections and the Court's observations during the hearings, on February 23, 2025,
11 the Debtor filed a supplemental liquidation analysis, addressing the liquidation value of all of the Debtor's
12 real property, notwithstanding the Debtor's position that it cannot be compelled to involuntarily liquidate
13 properties used for religious purpose. [Docket No. 1771].

14 The March 3, 2025, hearing was converted to a status conference, at which the Debtor informed
15 the Bankruptcy Court it intended to file a further revised Plan and Disclosure Statement on March 17,
16 2025. On March 17, 2025, the Debtor filed its third amended plan [Docket No. 1830] (the "Third Amended
17 Plan") and third amended disclosure statement [Docket No. 1831] (as amended, the "Third Amended
18 Disclosure Statement").

19 The Committee filed extensive objections to every iteration of the Disclosure Statement, each time
20 raising new grounds that it had not previously raised before and including numerous plan objections
21 asserted as disclosure statement objections [Docket Nos. 1518, 1629, 1773, and 1846]. This required the
22 Debtor, through Foley, to prepare replies to each addressing the new arguments in each iteration, as well
23 as the repeated arguments [Docket Nos. 1541, 1629, 1781, and 1851].

24 Additionally, on January 29, 2025, the Court entered a Memorandum requesting argument on
25 specific issues related to the insurance assignment in the Plan [Docket No. 1673]. At the hearing on
26 January 30, 2025, the Court directed the Debtor and Committee to file additional briefing on these issues
27 in connection with consideration of the Disclosure Statement. The Committee filed its brief addressing
28

1 these issues on February 7, 2025 [Docket No. 1705], and the Debtor filed its response on February 14
2 [Docket No. 1745]. The Insurers also filed a brief on the same date [Docket No. 1751]. While the Debtor
3 did not file a response to the Insurers' brief, it was necessary for the Debtor to analyze their arguments
4 and respond at hearing.

5 The Third Amended Disclosure Statement came for hearing on April 1, 2025. Although the
6 Committee had strenuously opposed approval of the Disclosure Statement from filing of the Original
7 Disclosures Statement on November 8, 2024, up to the hearing on April 1, immediately prior to the hearing
8 the Committee informed the Debtor that it would consent to approval of the disclosure statement subject
9 to agreement on a schedule for discovery and confirmation hearing. Following the filing of final technical
10 modifications to the Disclosure Statement, reflected in the final Third Amended Disclosure Statement
11 [Docket No. 1873] and other solicitation documents, the Disclosure Statement was approved at a brief
12 final hearing held on April 3, 2025. The Court entered its *Order (I) Approving Third Amended Disclosure*
13 *Statement; (II) Establishing Procedures for Plan Solicitation, Notice, and Balloting* [Docket No. 1877]
14 (the "Disclosure Statement Order"), on April 4, 2025, approving the Disclosure Statement and forms of
15 notices and ballots for Plan solicitation.

16 Pursuant to the Disclosure Statement Order, the Debtor completed solicitation of the Plan through
17 the efforts of Foley and Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), the Debtor's
18 claims and noticing agent. Concurrently, the Debtor reached agreement with the Committee on a final
19 scheduling for the hearing on confirmation of the Plan, reflected in the agreed *order setting certain dates*
20 *and deadlines in connection with confirmation of the debtor's third amended plan of reorganization*
21 [Docket No. 1893] (the "Confirmation Scheduling Order"), entered by the Court on April 15, 2025.

22 The Plan incorporates the agreement reached with the debtors' historical insurers (the "Insurers")
23 regarding assignment of insurance coverage for the benefit of the survivors of abuse. While the Debtor
24 and the Committee were not able to reach agreement on any terms of the Plan, many of the Plan's terms
25 reflect numerous stated requests of the Committee regarding structure and terms. To compensate the
26 victims and survivors of sexual abuse, the Plan creates a trust for the benefit of survivors of clergy abuse
27 (the "Survivors' Trust") and, for the benefit of survivors (i) funds the Survivors' Trust with over \$115
28

1 million in cash from the Debtor over a period of four years, (ii) provides for an additional contribution of
2 up to \$28.5 million from the Roman Catholic Welfare Corporation of Oakland (“RCWC”) to subject to
3 claimants providing voluntary releases to RCWC,¹² (iii) assigns to the Survivors’ Trust the Debtor’s
4 insurance rights in policy’s covering claims for sexual abuse, and (iv) creates a process for each survivor
5 to recover either from the Survivors’ Trust or from insurance coverage at the survivor’s sole election. The
6 terms of the Plan are more fully described in the Debtor’s Third Amended Disclosure Statement.

7 2. Discovery in Connection with Plan Confirmation

8 In light of the Committee’s demands for extensive discovery in connection with Plan confirmation,
9 the Confirmation Scheduling Order provided for an immediate start to discovery following entry of the
10 Disclosure Statement Order. Pursuant to this schedule, written discovery requests were due no later than
11 April 11, 2025, and the Debtor and Committee exchanged requests for production of documents and
12 interrogatories on that date. The Committee’s requests to the Debtor included 98 separate requests for
13 production, notwithstanding the thousands of documents previously produced by the Debtor, and 19
14 separate interrogatories. Given a response deadline of April 25, 2025, it was necessary for the Debtor and
15 Foley to immediately begin the extensive work of responding to this discovery.

16 Responding to the Committee’s discovery has been a massive project, especially in light of the
17 accelerated time frame made necessary by the urgency of getting to plan confirmation. Also produced
18 additional and Foley collected approximately 430,000 emails, that were reduced to approximately 130,000
19 by use of search terms. These were reviewed by a dedicated document review team of fourteen associates
20 and two partners. Foley reviewed and produced four document productions: The first, on May 14, 2025,
21 was approximately 3,500 documents and 42,000 pages. The second, on May 23, 2025, was approximately
22 5,500 documents and 40,000 pages. The third, on May 29, 2025, was approximately 25,000 documents
23 and 138,000 documents. The fourth, on June 1, 2025, was approximately 9,000 documents and 53,000
24 pages. In addition to the Debtor documents, Foley processed and produced approximately 3,000 emails
25

26 ¹² RCWC is the entity that owns and operates Catholic schools within the Diocese of Oakland. Unfortunately,
27 because no survivors who have asserted claims against RCWC have elected to provided releases to RCWC in
28 connection with the Plan, the contemplated contribution by RCWC that would have been provided in exchanged
for those releases will not be made available.

on behalf of VeraCruz in response to the Committee's subpoena directed to VeraCruz. As part of the Debtor document production, Foley deployed a team of 12 attorneys to determine whether additional documents located at the parish level.

In addition to the requests directed to the Debtor, the Committee also served 85 separate subpoenas directed to individual priests serving as Pastors of Churches within the Diocese. To address this massive overreach it was necessary for the Debtor to file a motion to quash, which was timely filed on April 25, 2025 [Docket No. 1924], and granted by the Court at a hearing on May 13, 2025. At the same time, the Committee filed a motion for a protective order regarding certain requests for production and interrogatories served by the Debtor seeking the basis for the Committee's decision-making in opposing the Plan [Docket No. 1922]. This motion was granted in part and denied in part at the same hearing on May 13.

While much of the discovery work has been in May in June, after the Interim Fee Period, the Debtor and Foley immediately began this work in April, follow approval of the Disclosure Statement and entry of the Confirmation Scheduling Order.

3. Work Toward Achieving a Global Settlement and Plan of Reorganization – Mediation

While the Debtor has to date been unable to reach agreement with the Committee on the terms of a consensual Plan, the Debtor has remained committed to a consensual resolution. After the Court's original order for mediation entered on the joint motion of the Debtor and Committee [Docket No. 810] (the "Mediation Order"), the Debtor engaged in extensive mediation with both the Committee and the Debtor's Insurers over the period from February through October 2024, with numerous in-person mediation sessions as well as virtual sessions and calls.

The Debtor did ultimately reach agreement with the Insurers. After about a half-dozen separate mediation sessions and numerous direct communications and exchanges of term sheets, the Debtor and Insurers reached agreement on the terms of the assignment of insurance coverage and other rights to the Survivors' Trust. This agreement was no small feat, with the Debtor, Insurers, and mediators Judge Newsome and Tim Gallagher meeting or communicating almost daily during the last two weeks of the

1 exclusivity period before reaching the agreement reflected in the Plan. Unfortunately, the Committee did
2 not join in that agreement.

3 The Debtor remained committed to the mediation process even after filing its Plan. After a
4 temporary pause in mediation following filing of the Plan, the Debtor filed a motion on January 10, 2025,
5 requesting an all-hands mediation session with the insurers, Committee, and all three court-appointed
6 mediators [Docket No. 1612] (the “Global Mediation Motion”). Surprisingly, the Committee opposed the
7 motion, filed its opposition on January 15, 2025 [Docket No. 1631]. The Pacific Insurers also filed a more
8 limited response on the same date [Docket No. 1632]. This forced the Debtor to file a reply [Docket No.
9 1638], together with a declaration illustrating its liquidity concerns underlying the request [Docket No.
10 1637]. Ultimately, after the Debtor filed its reply, the parties reached agreement for a renewed global
11 mediation, which occurred on February 24 and 25, 2025. Unfortunately, despite the Debtor’s best efforts,
12 the parties were unable to reach a resolution at this continued mediation.

13 The Debtor prefers a consensual resolution with the Committee and is more than willing to engage
14 with the Committee in further settlement discussions to the extent the Committee communicates an
15 updated settlement position/offer to the Debtor and indicates a willingness to discuss resolution on realistic
16 terms. The Debtor has also continued to participate in mediation and settlement discussions with the
17 Insurers regarding potential cash contributions to the Settlement Trust by the Insurers.

18 4. The Committee’s Numerous Motions and Adversary Proceedings and Defending
19 Against the Committee’s “Alternative Vision” for the Case

20 Immediately after the filing of the Original Disclosure Statement, on November 14, 2024, the
21 Committee sent a “Demand Letter” to the Debtor’s professionals, notifying the Debtor that the Committee
22 intended to pursue certain avoidance action claims against the Oakland Parochial Fund (“OPF”) and the
23 Churches if the Debtor declined to do so. In an effort to discern the Committee’s intent, the Debtor’s
24 counsel called Committee’s counsel to confer on the Demand Letter and the purported claims alleged
25 therein. However, after one conference call, and without receiving the Debtor’s refusal to pursue any
26 derivative claims, the Committee filed its first of many filings, detailed below.

27 A. The Committee’s Motions for Standing
28

1 The Committee filed its *Motion for Standing to Prosecute Claims of the Debtor's Estate* [Docket
2 No. 1462] seeking derivative standing motion on November 20, 2024, seeking standing to pursue
3 avoidance actions against OPF and the Churches (the "First Standing Motion"). Additionally, on the eve
4 of the hearing on the Original Disclosure Statement, the Committee filed another standing motion, seeking
5 (a) authority to pursue all claims the Debtor holds against its Insurers in the Insurance Coverage Litigation
6 that the Debtor filed and has been prosecuting for more than eighteen months, (b) authorization to
7 substitute the Committee as plaintiff in the already pending Insurance Coverage Litigation, and (c) (in a
8 footnote) to be given full control of the Debtor's attorney-client and attorney work product privilege
9 related to the Insurance Coverage Litigation and coverage issues (the "Second Standing Motion" and
10 together with the First Standing Motion, the "Standing Motions"). The Debtor filed its responses to the
11 First Standing Motion [Docket No. 1586] and Second Standing Motion [Docket No. 1580] on December
12 30, 2024.

13 While the motions and responses were filed in the prior interim period, the Standing Motions were
14 heard in the Interim Fee Period, in January 2025. For the reasons stated on the record at hearings held on
15 January 15, 16, and 21, 2025, the Court denied without prejudice both Standing Motions. The Court's
16 orders denying the Standing Motions were entered on February 1, 2025 [Docket Nos. 1700 and 1701].

17 *B. The Committee's Motion to Lift the Stay*

18 Also on November 20, 2024, the Committee filed a motion to lift the automatic stay [Docket No.
19 1460] (the "Lift Stay Motion") to allow six unspecified state court actions to proceed to trial or individual
20 settlements in order to (a) allegedly help establish benchmark values for all sexual abuse claims in this
21 Chapter 11 Case, (b) "unlock" available insurance and (c) allow claims against non-debtors named as
22 defendants in the state court actions to proceed. However the Lift Stay Motion also sought to pause the
23 confirmation process. Again the Debtor expended significant resources to analyze and prepare a detailed
24 response to the Lift Stay Motion, which it filed on December 30, 2024 [Dkt. No. 1581], focused
25 particularly on the practical effect of the relief the Committee was seeking: further driving up the costs of
26 the case and stalling confirmation, while also highlighting that letting only six cases proceed to trial would
27 not do anything to establish a baseline for over 300 other claims, all of which are factually distinct. In
28

1 addition to the Debtor's opposition to the Lift Stay Motion, a number of the Insurers also filed oppositions
2 to the Lift Stay Motion.

3 As with the First and Second Standing Motions, the Lift Stay Motion was heard on January 15,
4 and 16, prior to the Court delivering its ruling denying the lift stay motion on January 21, 2025. The
5 Court's order on the Lift Stay Motion was entered on February 12, 2025 [Docket No. 1721].

6 *C. The Committee's Adversary Proceedings*

7 Also on November 20, the Committee filed its first adversary proceeding complaint against the
8 Debtor, the Oakland Parochial Fund ("OPF"), and various Churches seeking (i) declaratory relief that the
9 real property Churches and funds are property of the estate and (ii) substantive consolidation of the Debtor
10 and the named Church defendants [Adv. No. 24-04051] (the "First Adversary Proceeding"). The
11 Committee represented that if the First Standing Motion was granted, it would amend the complaint in the
12 First Adversary Proceeding to add additional claims described in its First Standing Motion.

13 Moreover, less than a week before the initial hearing on the Original Disclosure Statement, on
14 December 11, the Committee filed a second adversary proceeding against the Debtor, Adventus, RCWC,
15 and RCC seeking (i) declaratory relief that all property of Adventus, RCWC, and RCC is property of the
16 estate and (ii) substantive consolidation of Adventus, RCWC, and RCC into the Debtor's Chapter 11
17 bankruptcy [Adv. No. 24-04053] (the "Second Adversary Proceeding," together with the First Adversary
18 Proceeding, the "Adversary Proceedings").

19 The Debtor filed motions to dismiss the original complaints in the Adversary Proceedings on
20 January 24, 2025, and strongly disputes the factual and legal contentions contained therein. The non-
21 debtor defendants in each of the Adversary Proceedings also filed motions to dismiss on the same date
22 (together with the motions filed by the Debtor, the "First Motions to Dismiss").

23 As set forth in the Debtor's First Motion to Dismiss [Adv. No. 24-04051, Docket No. 11], the
24 original complaint in the First Adversary Proceeding asked for relief that was almost entirely meaningless
25 and could not achieve any real benefit for creditors. The Committee's causes of action to consolidate
26 Churches into the Debtor's bankruptcy estate, or for declaratory relief holding that Church property is
27 property of the bankruptcy estate were meaningless, because, as the Debtor acknowledges, the Churches
28

1 are not separate from the debtor as a matter of applicable civil law, and property of the Churches is already
2 property of the bankruptcy estate, subject to certain funds being held in trust based on donor restrictions.
3 While it is the Debtor's position that Church real property cannot be involuntarily liquidated, the First
4 Adversary Proceeding had no bearing on that issue.

5 Likewise, as set forth in the Debtor's First Motion to Dismiss the original complaint Second
6 Adversary Proceeding [Adv. No. 24-04053, Docket No. 14], the original complaint Second Adversary
7 Proceeding, seeking similar relief as to Non-Debtor Catholic Entities Adventus, RCWC, and RCC was
8 likewise meritless and would not result in any benefit to creditors. RCWC and RCC are separately
9 incorporated non-profit organizations under California law, that respectively operate the Schools and
10 cemeteries within the diocese. Adventus is likewise a separate non-profit organization under California
11 law that owns certain real property. As a legal matter, the Committee's claims that they are
12 indistinguishable from the Debtor are extremely unlikely to succeed.

13 The Debtor filed its replies in support of the First Motions to Dismiss on February 26, 2025 [Adv.
14 No. 24-04051, Docket No. 21, and Adv. No. 24-04053, Docket No. 24]. The First Motions to Dismiss
15 were heard on March 4, 2025. After taking the matter under submission, the Court entered its *Order After*
16 *Hearing on Motions to Dismiss* [Adv. No. 24-04051, Docket No. 34] on April 4, 2025, dismissing the
17 complaint in the First Adversary Proceeding in its entirety. Similarly, the Court entered its *Order After*
18 *Hearing on Motions to Dismiss* [Adv. No. 24-04053, Docket No. 30] on April 22, 2025, dismissing the
19 complaint in the complaint in the Second Adversary Proceeding in its entirety.

20 In both cases, the Court's dismissal was without prejudice. In particular, while the Court found
21 that substantive consolidation of non-debtor non-profit corporations into the bankruptcy estate was
22 contrary to the Bankruptcy Code and therefore not available under Section 105, the Court granted leave
23 to give the Committee the opportunity to attempt to plead based on state law alter ego principles. In
24 addition, while the donor-restricted funds held by the Debtor ("Restricted Funds") were not substantively
25 addressed in the original complaint, the Court gave the Committee the opportunity to attempt to re-plead
26 the complaint in the First Adversary Proceeding with substantive claims as to the Debtor's Restricted
27 Assets.
28

1 While the Committee's amended complaints and the Debtor's responses fell after the Interim Fee
2 Period covered by this application, the proceedings are briefly summarized here for completeness. The
3 Committee filed its first amended complaint in the First Adversary Proceeding on April 30, 2025. [Adv.
4 No. 24-04051, Docket No. 36]. After expending substantial estate resources attempting to plead
5 substantial consolidation and declaratory relief claims against the Debtor's Churches and the Oakland
6 Fund ("OPF") in the original complaint, the Committee apparently recognized those claims were without
7 merit and pivoted to asserting claims related to Restricted Assets in its first amended complaint. Shortly
8 thereafter, on May 6, 2025, the Committee filed its first amended complaint in the Second Adversary
9 Proceeding. [Adv. No. 24-04053, Docket No. 32]. Here, the Committee did seek to replead its substantive
10 consolidation claims, this time expressly based on alter ego under California law, although it did not add
11 any material facts to the those that were already found to be inadequate in the original complaint.

12 The Debtor and the non-debtor defendants have filed motions to dismiss the amended complaints
13 in both adversary proceedings. As to the First Adversary Proceedings, while the Debtor recognizes that
14 there are material disputes as to Restricted Funds, the Debtor moved to dismiss on the basis that the
15 Committee failed to make any attempt to name or provide notice to the individual donors who have a
16 protected interest in how the property they donated is used. [See Adv. No. 24-04051, Docket No. 44]. As
17 to the Second Adversary Proceeding, the Debtor and the non-debtor defendants each moved to dismiss
18 primarily on the basis that the Committee, has entirely failed to adequately plead alter ego despite the best
19 efforts of skilled counsel after nearly two years of informal discovery into every aspect of the Debtor's
20 finances. [See Adv. No. 24-04051, Docket No. 41].

21 In sum, it is the Debtor's belief that the Adversary Proceedings will accomplish nothing other than
22 delay and wasting estate resources on attorneys' fees.

23 5. Other Motions and Filings in Furtherance of the Bankruptcy Case

24 While the primary areas of the Debtor's focus during the Interim Fee Period are described above,
25 Foley also addressed numerous other matters during the Interim Fee Period, as briefly summarized below,
26 and further described in the individual category narratives in the following section.
27
28

1 On March 11, 2025, the Debtor filed its *Fifth Motion to Extend Deadline to Assume or Reject*
2 *Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code*
3 [Docket No. 1825] (the “365 Motion”), seeking an extension of time to assume or reject the Debtor’s lease
4 with Catholic Cathedral Corporation of the East Bay (“CCCEB”) for use of the Oakland Cathedral
5 complex, including both the Cathedral of Christ the Light and the Debtor’s central offices. The 365
6 Motion was granted by the Court’s order entered on April 2, 2025 [Docket No. 1871], which extended the
7 Debtor’s time to assume or reject the CCCEB lease through October 1, 2025.

8 On January 31, 2025, the Debtor filed its *Fourth Motion for Entry of an Order, Pursuant To*
9 *Bankruptcy Rules 9006 and 9027, Enlarging The Period Within Which The Debtor May Remove Actions*
10 *Pursuant To 28 U.S.C. § 1452* [Docket No. 1689] (the “Removal Extension Motion”), which was granted
11 by the Court’s order entered on March 3, 2025 [Docket No. 1797], extending the deadline for removal of
12 state court actions through August 1, 2025.

13 Based on the Committee’s objections regarding the Debtor’s liquidation analysis in support of the
14 Plan, it was necessary for the Debtor to retain a professional to conduct a valuation as to the liquidation
15 value of all real property titled in the name of the Debtor. The Debtor filed its application to employ Hilco
16 Real Estate, LLC (“Hilco”) as its Real Estate Consultant for this purpose pursuant to 11 U.S.C. § 327 on
17 March 7, 2025 [Docket No. 1808]. The application was granted and employment of Hilco approved on
18 March 18, 2025 [Docket No. 1836].

19 One of the Debtor’s Churches, St. Perpetua Catholic Church in Lafayette, California was named
20 as the residual beneficiary of a testamentary trust known as the Bennett Trust. A dispute with the trustee
21 arose regarding the Debtor’s beneficial interest. Ultimately, this dispute was settled during the Interim Fee
22 Period, and on April 2, 2025, the Debtor filed a motion seeking approval of the settlement under Rule
23 9019 [Docket No. 1868]. The motion was unopposed and was granted by the Court’s order entered on
24 April 22, 2025 [Docket No. 1902]. These efforts resulted in a return of \$400,000 in funds recovered for
25 the estate.

26 In light of the extension of the Plan confirmation process beyond the Debtor’s targeted exit of two
27 years following the petition, together with the escalating professional fee costs driven by the Committee’s
28

litigation approach, on April 23, 2025, the Debtor filed its *Debtor's Motion to Amend Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 1908] (the "Motion to Amend Compensation Procedures"). By the Motion to Amend Compensation Procedures, the Debtor sought an amendment providing for an increase holdback amount, and a preservation of the holdback through the case conclusion: relief that the Debtor determined to be necessary in its business judgment in light of serious liquidity concerns. The Committee opposed this request subsequent to the Interim Fee Period, and ultimately, as the Court is aware, the parties reached agreement on a compromise at the hearing.¹³

In addition to the foregoing, it was necessary for the Debtor to address the following filings and other matters during the Interim Fee Period:

- The Committee's *Objection of the Official Committee of Unsecured Creditors to the Claim Scheduled by the Debtor for the Oakland Parochial Fund* [Docket No. 1524] (the "First OPF Claim Objection"), and *Second Objection of the Official Committee of Unsecured Creditors to the Claim Scheduled by the Debtor for the Oakland Parochial Fund* [Docket No. 1766]. Because the First OPF Claim Objection contained numerous inaccurate statements of fact, and false accusations regarding the Debtor's conduct, it was necessary for the Debtor to file a response [Docket No. 1661], even though the Debtor did not oppose disallowance of the OPF Claim. Indeed, the Debtor was able to obtain OPF's stipulation to withdrawal of its Claim [Docket No. 1784].
- The *Stipulation to Add Roman Catholic Welfare Corporation as an Authorized Party Under Bar Date Order Confidentiality Protocol* [Docket No. 1806], filed on March 6, 2026, which was negotiated with the RCWC and the Committee to provide RCWC necessary access to Claims asserted liability against RCWC. After the initial stipulation was filed and approved by the Court, at the Committee's request the Debtor and RCWC entered into an *Amended and Restated Stipulation to Add Roman Catholic Welfare Corporation as an Authorized Party Under Bar Date Order Confidentiality Protocol* [Docket No. 1832] making minor modifications to the agreed terms of the original stipulation.
- The *Motion to Enlarge the Claims Bar Date to Accept a Late Filed Proof of Claim* [Docket No. 1865], filed by claimant John, JB Doe, seeking to excuse a late-filed claim. While the Debtor had not opposed similar prior motions, the Debtor did believe it was in the best interests of the estate to file a limited opposition under the circumstances of this motion and the need for finality. The Debtor's response was filed on April 23, 2025 [Docket no. 1911].

¹³ Based on this agreement, the 20% holdback amounts on the monthly fee statements for the Interim Fee Period will not be paid on approval of this round of fee applications, but will be reserved pending further order by the Court.

- The *Stipulation and Agreement for Order Extending Time to Bring Avoidance Actions* [Docket No. 1876] between the Committee and the Debtor, providing for an extension of time for the Committee to bring avoidance actions. The stipulation was filed on April 4, 2025, and approved by the Court's order entered on the same date [Docket No. 1878].
- The fifth round of interim fee applications for estate professionals were filed on February 14, 2025, and came before the Court for hearing on April 30, 2025.
- The *Application for Order Authorizing the Retention of Stout Risius Ross, LLC as Real Estate Consultant and Expert Witness* [Docket No. 1887] filed by the Committee on April 9, 2025.
- The *Notice of Supplemental Retention of Ordinary Course Professional Dr. Kurt Martens Pursuant to Order (I) Authorizing the Retention and Payment, Effective as of the Petition Date, of Professionals Utilized by the Debtor in the Ordinary Course of Business; and (II) Granting Related Relief* [Docket No. 1890], providing for the retention of Dr. Martens to provide advice to the Debtor regarding Canon Law.
- The *Supplemental Application to Employ Berkeley Research Group, LLC as Consultant and Expert Witness* [Docket No. 1895] filed by the Committee on April 17, 2025. Because the scope of work suggested by the application was potentially far broader than necessary or appropriate, it was necessary for the Debtor to file a limited objection on April 18, 2025 [Docket No. 1898], which resulted in a consensual resolution of the issues.
- The *Notice of Data Security Incident* [Docket No. 1933], filed by the Committee's financial advisor Berkeley Research Group on April 29, 2025, disclosing a major data security incident potentially affecting information of the Debtor.

6. Compliance with Bankruptcy Obligations

Since the Petition Date, the Debtor has operated its business as a debtor in possession. During the Interim Fee Period, the Debtor has timely filed all of its required *Monthly Operating Reports* [Docket Nos. 1651, 1765, 1841, and 1900], as well as its periodic report pursuant to Bankruptcy Rule 2015.3 regarding value, operations, and profitability of entities in which the Debtor's estate holds a substantial or controlling interest [Docket No. 1754] reflecting its interest in the Furrer Properties, Inc. The Debtor has also paid all of its required quarterly fees to the US Trustee to date and has timely filed its reports regarding compensation paid to Ordinary Course Professionals.

III. SERVICES RENDERED¹⁴

In accordance with the *United States Bankruptcy Court Northern District of California Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees* (the "Northern District

¹⁴ The totals listed in this section for each category do not reflect the discount for *de minimis* timekeepers which

Guidelines”) and the Local Bankruptcy Rules for the Northern District of California (the “Local Rules”), Foley has attempted to place the services performed in the category that best relates to the service provided. However, because certain services affected multiple categories, services pertaining to one category may occasionally be included in another category. The fact that similar services appear in several different categories did not result in any duplication of work or billing. Further, given the size and complexity of this case, Foley submits that limiting each category to \$20,000 is not practicable.

During the Interim Fee Period, there were instances where more than one attorney from Foley participated in meetings, hearings, or other matters. Sometimes, this participation was for less than the full meeting or hearing, for efficiency. In the Debtor and Foley’s opinion, the complex nature of the case requires different attorneys within Foley to work on different work streams, each focused on particular issues and matters, but together contributing to the overall case strategy. As a result, Foley believes it was appropriate to keep multiple attorneys familiar with these matters in order to more efficiently render services and provide the most effective representation to the Debtor. In the Debtor and Foley’s opinion, this did not lead to duplicative or unnecessary services for the Debtor.

Foley has established the following billing categories in this case to date:

001 – Administrative Expense Claims
002 – Asset Sales/ 363 Sales
003 – Automatic Stay
004 – Bankruptcy Litigation/Adversary Proceedings
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues
006 – Case Administration (Docket Updates, WIP and calendar)
007 – Chapter 11 Plan/Plan Confirmation
008 – Communications with Client
009 – Corporate Governance and Board Issues
010 – Vendor Issues
011 – Cash Management
012 – Disclosure Statement
013 – Employee Issues
014 – Exclusivity
015 – Executory Contracts/Lease Issues

is included in the total fees requested.

016	General Case Strategy (includes calls with client and team calls)
017	Hearings and Courts Matters
018	Non-Bankruptcy Litigation
019	Reserved
020	Retention/Billing/Fee Applications for Debtor Professionals
021	Retention/Fee Applications: Ordinary Course Professionals
022	Retention/Fee Applications: Other Professionals
023	Schedules/Statement of Financial Affairs
024	Tax Issues
025	U.S. Trustee Issues/Meetings/Communications/Monthly Operating Report
026	Unsecured Creditors Issues/Communications/Meetings
027	Real Estate and Real Property Issues
028	Tort Claims
029	Non-Tort Proofs of Claim
030	Insurance Issues (other than coverage)
031	Insurance Issues (coverage)
032	Rule 2004 Motions/Discovery/Subpoenas
033	First Day Motion Practice
034	Other Motion Practice
035	General Counsel Matters
036	Secured Creditor Matters
037	Financing
038	Mediation

Exhibit G includes Foley's invoices for the Interim Fee Period, which includes a detailed breakdown of the time entries and expenses incurred, by task category.

Foley has agreed that it will not charge the Debtor for the travel time undertaken by its attorneys and other professionals. During the Interim Fee Period, Foley incurred, but did not charge the Debtor for, 92.9 hours of travel time, totaling \$86,337.50 in fees not charged to the Debtor.

A. Automatic Stay (003)

Total Hours 32.20/Total Fees \$29,926.50

During the Interim Fee Period, Foley, among other things, continued to address the Committee's Lift Stay Motion to allow six undetermined personal injury cases to move forward to resolution in state court, purportedly to help establish data points for the resolution of other claims. The Committee also argued that the confirmation process should be paused during the resolution of these cases, which would cause significant delay in the resolution of this case. Therefore, the response to the Lift Stay Motion was

of paramount importance to the Debtor. The Lift Stay Motion was denied without prejudice during the Interim Fee Period and Foley and Committee counsel worked to prepare a consensual order reflecting the Court's decision. In addition, Foley attorneys also addressed issues related to state court proceedings with respect to its co-defendants in those cases, and the impact of the Court's decision to deny the Lift stay Motion on other parties.

B. Bankruptcy Litigation/Adversary Proceedings (004)

Total Hours 283.90/Total Fees \$230,152.50

This task code includes Foley's time in addressing litigation and contested matters in the Chapter 11 Case. Most of this time was incurred in addressing and responding to the barrage of litigation brought by the Committee in response to filing of the Original Plan. This includes the First Standing Motion, Second Standing Motion, and both Committee Adversary Proceedings. As set forth above, time related to the Lift Stay Motion is categorized in task code 003.

Early in the Interim Fee Period, the Court held hearings on the First and Second Standing Motions, and denied them without prejudice. See Docket Nos. 1700 and 1701. Foley incurred time related to the hearings on these motions in January 2025.

The majority of Foley's time incurred during the Interim Fee Period in this category was spent litigation related to the Adversary Proceedings. Specifically, Foley researched the issues raised by the Adversary Proceedings, analyzed the factual circumstances and prepared motions to dismiss both cases. Foley also prepared replies in support of both Motions to Dismiss in response to the Committee's objections to the Motions. Foley also prepared for the hearings on these motions. Ultimately, on April 4, 2025, the Court dismissed both Adversary Proceedings without prejudice and with leave to amend. More detail regarding the Adversary Proceedings can be found in Section C.4, *infra*.

Also during the Interim Fee Period, Foley expended significant time and effort attempting to reach a settlement with the Committee with respect to the property of the estate. This work included months of negotiations over a draft stipulation with Committee counsel. Unfortunately, despite Foley and the Debtor's best efforts, this process was ultimately unsuccessful.

Foley also continued work on the turnover of estate property from a trust during the Interim Fee Period. Foley filed a motion pursuant to Rule 9019 and related documents reflecting its settlement with the trustee of the trust to resolve the matter and the Court entered the order approving the stipulation on April 22, 2025. *See* Docket No. 1902. These efforts resulted in a return of \$400,000 in funds recovered for the estate.

C. Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues (005)

Total Hours 49.60/Total Fees \$35,832.50

During the Interim Fee Period, Foley’s professionals analyzed claims that involved both the Debtor and other non-Debtor Catholic entities and the liability for such claims. This included negotiations with counsel for the Committee and the Roman Catholic Welfare Corporation (“RCWC”) to add RCWC to the group of parties who are entitled to see the proofs of claim filed in the case, subject to the execution of an agreed confidentiality agreement. Once the agreement was reached, Foley then worked to produce the proofs of claim to RCWC, subject to the confidentiality protocols already in place. Foley also worked with the Unknown Claims Representative to provide access to the claim under the same confidentiality protocol.

In addition, during the Interim Fee Period, the Debtor worked to address an additional motion for leave to bring a late-filed claim and filed an objection to that motion, and continued its review of the claims that have been filed.

D. Case Administration (docket updates, WIP, and calendar) (006)

Total Hours 80.40/Total Fees \$33,222.00

During the Interim Fee Period, Foley, among other things, worked on (i) general case administration such as reviewing and calendaring matters before the Court, including maintenance of Foley’s Master Case Calendar and timeline; (ii) preparing updates regarding filed documents to timely inform the entire case team of new issues; (iii) preparing a detailed calendar and timeline for the Plan confirmation process; and (iv) updating and maintaining the Core Service List. Foley uses attorneys to conduct its reviews of pleadings and calendaring matters given the critical nature of these items. However,

to be mindful of costs, Foley primarily staffs an associate attorney and a paralegal on these matters with limited review by a partner.

E. Chapter 11 Plan/Plan Confirmation (007)

Total Hours 137.50/Total Fees \$111,802.00

During the Interim Fee Period, Foley, among other things, prepared subsequent versions of the Plan, including First, Second, and Third Amended Plans. The Court permitted the Debtors to solicit votes on the Third Amended Plan, and that process is underway at this time, with the confirmation hearing set to begin on August 25, 2025. In each of the Amended Plans, Foley worked to address objections that had been filed to prior versions by the Committee and the United States Trustee, revise the Amended Plans to account for feedback from other parties in interest, and to include provisions and information as the Court instructed.

In connection with the drafting of the Amended Plans and analysis of the key elements contained in them, Foley had multiple meetings with the Debtor's leadership regarding the potential structure and approach to a plan, treatment and classification of claims, and the assets to be included in the plan. In addition, during the Interim Fee Period, Foley conducted research on Plan confirmation issues, and began to work with the Committee on confirmation discovery matters. Foley also began to analyze potential expert witnesses to be retained for the confirmation process. More details about the discovery process are included in task code 032 below. Further details regarding Foley's work on the Plan during the Interim Fee Period are included at Section C.2 *infra*.

F. Communications with Client (008)

Total Hours 120.00/Total Fees \$114,652.50

During the Interim Fee Period, Foley, among other things, (i) held in-person and telephone or video conference meetings with certain of the Debtor's leadership and employees on all matters related to the Bankruptcy Case and its administration, including both scheduled and *ad hoc* meetings as case circumstances dictated; and (ii) undertook email and other written communications with the Debtor's leadership and employees on all matters related to the Bankruptcy Case and its administration, including regular case status emails to keep the Debtor team updated on developments and deadlines in the

Bankruptcy Case. Specifically, during this Interim Fee Period, the Debtor addressed certain privileged matters with the Debtor's leadership, spent considerable time with the Debtor and its other professionals on the formulation and drafting of several Amended Plans, worked on responses to the Committee's objection to the Amended Disclosure Statements, the First and Second Standing Motions, the Lift Stay Motion, and the Adversary Proceedings, reviewed issues related to the valuation of the Debtor's real estate assets, analyzed funding and cash flow issues with the Debtor and its professionals, conferred regarding confidential mediation matters and extensively strategized as to the Debtor's responses to matters raised in the global mediation session that occurred during the Interim Fee Period, and prepared for and conducted meetings with various groups of client representatives, such as the Finance Council. General strategy meetings and communications are captured in this task code, while specific tasks related to particular matters may be found in those codes.

G. Corporate Governance and Board Issues (009)

Total Hours 1.50/Total Fees \$1,168.50

During the Interim Fee Period, Foley, among other things, (i) prepared information for the Debtor to use in an audit; and (ii) analyzed OPF documents and related lending matters.

H. Cash Management (011)

Total Hours 13.50/Total Fees \$12,642.50

During the Interim Fee Period, Foley addressed numerous matters relating to the Debtor's cash management, including, among other things, (i) analyzing certain of the Debtor's donor gifts, grants and bequests; (ii) addressing issues regarding the Debtor's quarterly payments to CCCEB for use of the Cathedral property and central services offices, and providing notice to the Committee and US Trustee regarding the same; (iii) work on the Debtor's cash flow forecast and cash management issues; and (iv) reviewing cash flow and related financial matters with respect to Plan funding. Foley also continued to review and analyze issues related to restricted gifts and restricted cash holdings, including as to church restricted cash, and substantiation and documentation of restricted funds.

1 **I. Disclosure Statement (012)**

2 **Total Hours 546.60/Total Fees \$456,777.00**

3 During the Interim Fee Period, Foley spent significant time preparing multiple Amended
4 Disclosure Statements to accompany the Amended Plans. Specifically, Foley attorneys analyzed the
5 information required to be included in the Amended Disclosure Statements, including what information
6 needed to be included in the updated Liquidation Analysis based on the Court's order to include all
7 properties owned by the Debtor. In order to comply with the Court's order, Foley and the Debtor engaged
8 Hilco to perform a valuation of all of the real estate titled in the name of the Debtor. Foley worked with
9 Hilco professionals to complete this valuation process within the limited time available. Foley also worked
10 with A&M to complete the revised liquidation analysis reflecting the value of the real estate. During the
11 Interim Fee Period, Foley worked extensively on the liquidation analysis to further refine it and ensure it
12 met the Court's requirements.

13 Foley incurred significant time preparing the extensive Amended Disclosure Statements, to ensure
14 that each provided adequate information for creditors to vote on the accompanying Amended Plan,
15 including a lengthy discussion of the proposed Survivors' Trust and the options for Survivors to resolve
16 their claims, whether by accepting an immediate payment, having an independent Trustee review their
17 claims, or through litigation. Foley attorneys also drafted a detailed explanation of their proposed
18 resolution with the Insurers for creditors to consider.

19 During this period, Foley also revised and updated Approval Motion, which included a number of
20 ancillary documents, including notices, detailed voting instructions, and ballots for the various classes of
21 creditors. After the filing of each Amended Disclosure Statement, the Committee filed objections to them,
22 and the Debtor prepared detailed responses to each. During the Interim Fee Period, the Court held also
23 held several hearings on the Amended Disclosure Statements. Ultimately on April 4, 2025, the Court
24 approved the Third Amended Disclosure Statement and its related Plan for solicitation to creditors. See
25 Docket No. 1877. After the Third Amended Disclosure Statement was approved Foley worked with the
26 Debtor's Claims and Noticing Agent to ensure proper service of the Disclosure Statement and Plan, and
27 the ballots and related documents. Further details regarding this work are included at Section C.2 *infra*.

1 **J. Executory Contracts/ Lease Issues (015)**

2 **Total Hours 3.90/Total Fees \$3,412.50**

3 During the Interim Fee Period, Foley addressed issues related to the lease with CCCEB, including
4 preparation and filing of a motion to extend time to assume or reject that lease.

5 **K. General Case Strategy (includes teams calls) (016)**

6 **Total Hours 94.90/Total Fees \$78,976.50**

7 This task code includes Foley's time incurred on both essential communications among the
8 Debtor's restructuring team and professionals, and work on case strategy and planning. In connection with
9 communications, Foley, among other things, (i) held internal team coordination calls only when needed
10 to ensure the core group of attorneys working on the case were up to date on all case matters and could
11 coordinate the various work streams; and (ii) held meetings only as necessary with the Debtor's other
12 professionals (*e.g.*, A&M, Vera Cruz, and the communications team) to align on various issues in the case.
13 This time also includes communications between various Foley team members as necessary to coordinate
14 on various work streams and projects, including primarily the Plan and Disclosure Statement during this
15 Interim Fee Period. For ease of analysis, the internal communications, and meetings within Foley and
16 between Foley and other Debtor professionals are generally included in this task code, unless they related
17 to a specific issue included in another task code. In some cases, professionals attended and billed for only
18 a portion of a meeting.

19 In connection with case strategy and planning, Foley researched and strategized regarding issues
20 including: (i) matters related to appropriate Rule 2019 disclosures in the case; (ii) analyze potential
21 responses to issues raised by the Committee in the context of the Amended Disclosure Statements and in
22 mediation; (iii) review of restricted asset matters; and (iv) evaluation of other diocesan cases and their
23 current status, including researching and preparing information on the Archdiocese of San Francisco case
24 and talking to attorneys involved in that case , in order to evaluate successful outcomes that will provide
25 helpful guidance to the Debtor in this case.

1 **L. Hearings and Court Matters (017)**

2 **Total Hours 170.60/Total Fees \$154,737.50**

3 During the Interim Fee Period, Foley extensively prepared for and represented RCBO at hearings
4 including (i) a lengthy two-day hearing on January 15-16, 2025 at which time the Court heard argument
5 on the First Amended Disclosure Statement, the Lift Stay Motion, the Adversary Proceedings, and the
6 First and Second Standing Motions; (ii) a continued hearing on the First Amended Disclosure Statement
7 on January 30, 2025; (iii) a status conference on March 3, 2025; (iv) a hearing on the motions to dismiss
8 the Adversary Proceedings on March 4, 2025 (v) an April 1, 2025 hearing regarding the Debtor's Third
9 Amended Disclosure Statement; (vi) a continued hearing on the Third Amended Disclosure Statement on
10 April 3, 2025; (v) a status conference on April 23, 2025; (vi) a hearing on the Committee's Motion to
11 retain Stout Risius Ross as an expert; and (vii) the April 30, 2025 hearing on Interim Fee applications.
12 For each of these hearings, Foley only billed time for its attorneys where Foley believes they were
13 necessary and actively supported the Debtor's position at the hearing. In some cases, additional Foley
14 attorneys were present at a hearing but did not bill their time for the hearing.

15 **M. Non-Bankruptcy Litigation (018)**

16 **Total Hours 206.80/Total Fees \$142,705.00**

17 Time in this task code relates primarily to the JCCP 5108 Superior Court coordinated proceedings,
18 as they relate to bankruptcy issues. Foley (i) prepared for and attended case management conferences on
19 January 22, 2025 and February 26, 2025, in JCCP 5108 in order to monitor matters that could potentially
20 affect the automatic stay or the Bankruptcy Case, and to address bankruptcy issues arising in the case
21 management conferences; (ii) reviewed issues related to the litigation pending in state court, including
22 discovery matters and motions in limine; (iii) researched and analyzed issues related to the automatic stay
23 in light of cases proceeding to trial; (iv) communicated with counsel for other parties, including co-
24 defendants, and participated in meet and confer calls; (v) work analyzing certain claims as directed by
25 Judge Chatterjee in the JCCP 5108 matter; (vi) coordinated with RCWC counsel on claims which name
26 both parties as defendants to provide appropriate information to RCWC; work on portions of JCCP 5108
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case management order, including statement by Debtor; and (vii) compiled extensive data on claims for production to RCWC's counsel.

N. Retention/Billing/Fee Applications for Debtor Professionals (020)

Total Hours 106.20/Total Fees \$79,865.50

During the Interim Fee Period, Foley, among other things, (i) prepared its monthly fee statements for December 2024 and January – March 2025; (ii) prepared Foley's Fifth Interim Fee Application; (iii) assisted the Debtor's other professionals with fee statements and Interim Fee Applications; (iv) prepared Hilco's application to be retained as the Debtor's real estate valuation expert under Section 327; (v) drafted a motion to amend the Interim Compensation Order to increase the monthly holdback for professionals in order to address the Debtor's cash flow issues. Foley attorneys also discussed the Fourth Interim Fee Application with the Fee Examiner, attended the hearing on the Interim Fee Applications, and prepared an omnibus order for all of the approved fees in accordance with the rulings of the Court.

O. Retention/Fee Applications: Ordinary Course Professionals (021)

Total Hours 12.30/Total Fees \$9,812.00

During the Interim Fee Period, Foley addressed necessary issues regarding employment and compensation of ordinary course professionals, including, among other things, (i) preparing an OCP application for Hilco (later changed to a Section 327 application after the Committee objected); (ii) analyzing OCP invoices; (iii) preparing the retention documents for Dr. Kurt Martens as a canon law expert; (iv) preparing and filing the Debtor's quarterly report regarding compensation to ordinary course professionals and compliance with the Court's order regarding the retention of Ordinary Course Professionals [Docket No. 263] (the "OCP Order"); and (v) coordinating with the Debtor regarding payment of ordinary course professionals in compliance with the OCP Order.

P. Retention/Fee Applications: Other Professionals (022)

Total Hours 40.90/Total Fees \$31,872.00

During the Interim Fee Period, Foley, among other things, (i) reviewed issues related to the compensation and monthly fee statements of professionals retained by the Committee; (ii) provided information and assistance to the Court-appointed mediators with respect to the filing of their interim fee

1 applications for the period of September - December 2024; (iii) prepared objection to Committee's
2 retention of Stout Risius Ross and negotiated a resolution to that issue and the application to expand
3 BRG's employment with the Committee; and (iv) worked with the Debtor to ensure payment of amounts
4 owed for monthly fee statements and Interim Fee Orders.

5 **Q. U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Report (025)**

6 **Total Hours 11.90/Total Fees \$9,246.00**

7 During the Interim Fee Period, Foley, among other things, assisted the Debtor with final review
8 and filing of monthly operating reports ("MORs") and analyzing the quarterly US Trustee fee payments
9 required. In order to minimize professional fee expenses, Foley's work on MORs was largely limited to
10 final review of the MORs and addressing specific questions and issues. In addition, during the Interim
11 Fee Period Foley assisted with the preparation of Rule 2015.3 periodic report regarding the Debtor's
12 interest in CTN.

13 **R. Unsecured Creditor Issues/Communications/Meetings (026)**

14 **Total Hours 36.40/Total Fees \$32,677.50**

15 This category reflects Foley's time incurred in communications with the Committee's
16 professionals, particularly regarding various aspects of the Plan and Disclosure Statement, and the
17 increasing rate of professional fees charged by Committee professionals in the case to date. This included
18 numerous telephone and video conferences, as well as written communications, with counsel for the
19 Committee on issues of mutual concern, including the course of the case generally, follow-up discussions
20 after mediation sessions, a potential stipulation to resolve issues surrounding the determination of what
21 would be considered property of the estate. In addition to communications with Committee professionals,
22 this task code includes some time incurred by Foley attorneys in coordinating internally and with the
23 Debtor and its professionals regarding responses to the Committee's information requests. Time spent
24 responding to the Committee's motions and adversary proceedings are found in Task Codes 003 (Lift Stay
25 Matters), 004 (Bankruptcy Litigation/Adversary Proceedings), and 012 (Disclosure Statement).

1 **S. Real Estate and Real Property Issues (027)**

2 **Total Hours 16.80/Total Fees \$14,780.00**

3 During the Interim Fee Period, much of Foley's time incurred was related to evaluation of real
4 estate assets of the Debtor. This included, among other things, analysis and valuation of the Debtor's real
5 property in conjunction with Hilco.

6 **T. Tort Claims (028)**

7 **Total Hours 2.80/Total Fees \$1,262.50**

8 This task code captures Foley's time incurred in addressing matters related to state court sexual
9 abuse actions, to the extent the time is not reflected in task code 018, above, as well as other tort claims.
10 In general, time included in 018 relates to automatic stay and bankruptcy matters related to the JCCP 5108
11 proceedings, whereas time in this task code relates primarily to non-bankruptcy issues. During the Interim
12 Fee Period, Foley continued to analyze the resolution of claims involving co-defendants in tort litigation
13 matters, and to communicate with counsel for these co-defendants on such matters, and to provide
14 information on certain claims as requested by co-defendants' counsel.

15 **U. Non-Tort Proofs of Claim (029)**

16 **Total Hours 1.90/Total Fees \$1,154.00**

17 During the Interim Fee Period, Foley's work related to non-tort claims, as reflected in this task
18 code, including analysis of OPF claim and Committee's objection to same.

19 **V. Insurance Issues (coverage, incl. adversary proceeding) (031)**

20 **Total Hours 476.60/Total Fees \$369,156.50**

21 During the Interim Fee Period, Foley's focus in the Debtor's coverage litigation in the Insurance
22 Coverage Litigation turned principally to progressing document discovery. In addition, Foley worked with
23 the Insurers and mediators through the mediation process to discuss the possibility of insurer settlement
24 contributions to the Debtor's proposed Plan of Reorganization in the Bankruptcy. The Debtor's insurance
25 coverage for abuse claims is one of the largest assets available to compensate claimants. Aggressively
26 pursuing insurance coverage, whether through settlement, full assignment of RCBO's insurance asset
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through the Plan, or the Insurance Coverage Litigation, is essential to preserving and maximizing this asset for the benefit of RCBO's estate and the claimants.

1. Motion to Hold Cases in Abeyance

The Debtor filed its Reply in Support of its Motion to Hold Cases in Abeyance January 10, 2025 [Dist. Ct., Docket No. 161]. This task code therefore includes time spent drafting this Reply brief. This task code also includes time spent preparing for the January 16, 2025, hearing on the Debtor's Motion to Hold Cases in Abeyance, including strategic analysis and legal research in support of the Debtor's position.

2. Continuing Discovery Process

The District Court granted the Debtor's Motion to Hold Cases in Abeyance in part, directing the parties to proceed with all written discovery they believe is needed for the Insurance Coverage Litigation. This task code therefore includes Foley's time spent progressing document and written discovery. This included analysis of client document collections, consideration of document confidentiality issues, planning and strategy for document review, preparation of document review guidelines, and training for first-level reviewers. This work also included multiple internal conferences regarding relevance and confidentiality issues and analysis of documents subject to production. This task code also includes Foley's time spent conducting first-level and second-level quality control document review itself, as well as time spent finalizing and serving document productions on insurers. In addition, this task code includes Foley's time spent discussing, analyzing, and responding to written discovery requests—both formal and informal—from the insurers, conceiving of and drafting written discovery requests from the Debtor to certain insurers, as well as Foley's time conducting meet and confer calls with insurers regarding the Debtor's and the insurers' document requests and productions. Foley also worked with the insurers to draft a Joint Status Update to the District Court regarding the status of discovery in the Insurance Coverage Litigation as of March 3, 2025. Finally, in connection with its discovery efforts Foley also spent time on procedural and logistical coordinating with the Debtor's separate counsel for the related matter against specific insurers (Breall & Breall).

1 3. Further Mediation Efforts

2 During this Interim Fee Period the parties continued their efforts and discussions related to
3 potential settlement with certain insurers in the form of contributions to the Debtor's Plan of
4 Reorganization. This task code therefore reflects Foley's time spent in discussions with the mediators and
5 insurer representatives as part of this effort. Much of the work related to the mediation process is
6 categorized in the mediation task code (038). That task code also includes substantial work specifically
7 on the insurance mediation.

8 4. Miscellaneous Matters included in Task Code

9 This task code also reflects other insurance-related work by Foley during the Interim Fee Period
10 that touch on concurrent issues in the Bankruptcy Case, including time spent (i) responding to insurer
11 inquiries regarding the Debtor's statements in the Disclosure Statement regarding its claims analysis,
12 specifically the number of claims that are likely not viable for timeliness and other reasons; (ii) production
13 of unredacted proofs of claim to insurers up their execution of the appropriate confidentiality order; (iii)
14 analysis of potential issues related to a bad faith cause of action against insurers in connection with the
15 insurance assignment under the Plan; (iv) analysis of and responding to insurer inquiries related to letters
16 from Plaintiff's counsel seeking information regarding insurance policy limits; and (v) coordinating with
17 counsel for RCWC to provide access to insurance- and non-insurance-related document productions.

18 **W. Rule 2004 Motions/Discovery/Subpoenas (032)**

19 **Total Hours 349.70/Total Fees \$276,476.50**

20 During the Interim Fee Period, Foley's work related primarily to discovery issues in the
21 confirmation process, which are described in more detail below. In addition to this work, Foley also
22 engaged with Committee counsel on a number of issues including the Debtor's request for the
23 Committee's bylaws, which the Committee refused to produce informally, but which it was ultimately
24 required to produce pursuant to Court order, producing information on insurance matters, and responding
25 to additional document requests from the Committee.

26 Once the Court approved solicitation of the Third Amended Plan, Foley began extensive work on
27 confirmation discovery matters, which are contained in this code. This included researching and analyzing
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1 the information which would be needed for the contested confirmation process, including from the
2 Committee. Foley attorneys worked on a plan to obtain all of the required information, including
3 identifying the appropriate documents and witnesses that would be needed. Foley also drafted and served
4 53 Requests for the Production of Documents and 23 Interrogatories on the Committee and evaluated
5 potential parties to be deposed.

6 Foley also incurred significant time on responding to the discovery propounded by the Committee.
7 The Committee served 98 Requests for Production of Documents and 19 Interrogatories (the “Committee
8 Discovery Requests”) on the Debtor, the responses to which required a significant amount of consultation
9 between Foley and the Debtor in order to ensure complete and timely responses, including meetings and
10 correspondence with the Debtor’s IT department in order to ensure collection of responsive documents.
11 Foley worked with the Debtor to collect the information which would be necessary to answer the requests.
12 Foley also drafted lengthy and detailed responses and objections to the Committee Discovery Requests.
13 In addition to the Committee Discovery Responses, the Committee also served subpoenas on Bishop
14 Barber and the Debtor’s profession Vera Cruz Advisory, to which Foley prepared detailed responses and
15 objections.

16 The Committee also sent approximately 85 subpoenas to the priests at each parish within the
17 Diocese. Foley reviewed the subpoenas and determined that it was appropriate to file a motion to quash
18 all of them, which it prepared and filed. The Court ultimately granted the motion after the Interim Fee
19 Period. While the motion to quash was pending, Foley also began to contact each of the priests to inform
20 them of the subpoena that had been directed toward them and to advise them of the next steps in the
21 process. The Committee also filed a Motion for a Protective Order regarding the discovery served by the
22 Debtor, to which the Debtor researched and prepared a response. That motion was ultimately granted in
23 part and denied in part after the Interim Fee Period.

24 In addition to the foregoing, during the Interim Fee Period, Foley also communicated with
25 Committee counsel on various discovery issues and reviewed the Debtor’s prior productions to the
26 Committee to determine if they satisfied certain of the Committee Discovery Requests.

1 **X. Other Motion Practice (034)**

2 **Total Hours 28.40/Total Fees \$22,490.00**

3 During the Interim Fee Period, Foley addressed various litigation matters including preparing a
4 motion to extend the deadline to remove causes of action, and undertook further work on a motion to
5 dismiss the case as an alternative resolution if needed due to the continuing and accelerating cash burn
6 resulting from the Committee's litigation tactics. In addition, Foley continued to research the Rule 2019
7 obligations of various parties in the case, including state court counsel representing individual tort
8 claimants and Committee members. Foley determined such research was necessary based on information
9 that it received from various sources that a number of these state court counsel had been given proxies by
10 their Committee-member clients and were driving the Committee's actions in the case.

11 **Y. General Counsel Matters (035)**

12 **Total Hours 24.30/Total Fees \$16,675.00**

13 The Debtor does not have an in-house attorney or general counsel. Rather, Foley serves as outside
14 general counsel for the Debtor and has done so for over a decade, resulting in the efficient delivery of
15 legal services to the Debtor to address a number of day-to-day operational issues. During the Interim Fee
16 Period, Foley, among other things, assisted the Debtor with certain construction projects and the related
17 contracts, as well as advising the clients on certain policies for the Debtor going forward.

18 **Z. Financing (037)**

19 **Total Hours 30.20/Total Fees \$26,521.00**

20 During the Interim Fee Period, Foley continued negotiations with the Debtor's secured creditor on
21 the terms of possible exit financing, and researched the most appropriate terms for the transaction. In
22 addition, Foley worked with the Debtor to further analyze what types of property could be used as
23 collateral for the financing and to repay the loan, and the value of such collateral, including review of
24 appraisals and other information about the properties. Foley also began to draft loan documents for the
25 transaction including the credit agreement.

1 **AA. Mediation (038)**

2 **Total Hours 165.50/Total Fees \$151,089.50**

3 From the beginning of this Bankruptcy Case, the Debtor has consistently been committed to
4 achieving a confirmed plan of reorganization, if possible, by reaching agreement with either or both of the
5 Committee and some or all of its insurers for a consensual plan of reorganization. However, mediation
6 had stalled in late 2024, and Foley prepared a motion for an order directing all parties to attend a global
7 mediation in hopes of reaching a settlement on the outstanding issues in the case. Ultimately, the Court
8 granted that motion and all parties appeared for a two-day in-person mediation in San Francisco, California
9 on February 24-25, 2025.

10 During the Interim Fee Period, the Debtor and Foley prepared extensively for and participated in
11 the Global Mediation. Foley attorneys also undertook follow up work in hopes of building on the
12 mediation. Throughout this period, Foley engaged in extensive analysis, and strategy with the Debtor and
13 its other professionals in connection with mediation. This included work continuing to analyze and
14 develop mediation strategy; numerous calls, meetings, and emails with client leadership regarding
15 privileged strategy matters; preparation of memoranda to the Debtor's management regarding mediation
16 action items, strategy, and proposals; communications with the mediators between mediation sessions to
17 provide information and discuss matters to be addressed in mediation sessions; analyzing certain insurance
18 issues; and evaluation of assets relevant to mediation including real estate assets. Ultimately the global
19 mediation was not successful, however, Foley has continued its efforts to reach a settlement with certain
20 insurers as part of the confirmation process and has continued to work with the mediators to facilitate
21 those discussions. Such efforts are ongoing.

22 **IV. REIMBURSEMENT OF EXPENSES**

23 **A. List of Expenses by Category**

24 Foley advanced costs, including certain in-house charges, in connection with the performance of
25 the services described in this Interim Application. During the Interim Fee Period, Foley incurred and billed
26 the Debtor a total of \$20,827.46 in expenses. As this modest amount reflects, Foley made every effort to
27 keep the costs in this case to a minimum. Additionally, as noted above, Foley agreed that it would not
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1 charge the Debtor for any travel expenses for its attorneys to travel to the Bay Area, including airfare,
2 meals, and hotels. During the Interim Fee Period, Foley wrote off the sum of \$32,437.00 for such travel
3 expenses. Foley absorbed these costs itself. A summary chart detailing the type and amount of expenses
4 incurred during the Interim Fee Period is attached hereto as **Exhibit E**.

5 Foley does not charge for photocopying expenses, print jobs, or scanned copies. However, it might
6 sometimes be necessary for Foley to send large copying projects to an outside copy service that charges a
7 reduced rate for photocopying. Foley also hosts a litigation support platform for the Debtor in relation to
8 the previously-filed state court abuse litigation which is being utilized in this case also. Charges for hosting
9 that platform are included in this application.

10 Regarding providers of on-line legal research, Foley charges the standard usage rates these
11 providers charge for computerized legal research. Foley bills its clients the actual amount charged by such
12 services, with no premium. Any volume discount received by Foley is passed on to the client. Foley does
13 not charge for local or long distance calls placed by attorneys from their offices. Foley only bills its clients
14 for the actual costs charged to Foley by teleconferencing services in the event that a multiple-party
15 teleconference is initiated through Foley.

16 **V. COMPLIANCE WITH GUIDELINES**

17 **A. Hourly Rates**

18 The hourly rates of all professionals and paraprofessionals rendering services in this case are set
19 forth on the Billing Summary Chart on **Exhibit C** annexed hereto. As noted in Foley's retention
20 application and other documents, Foley's rates increase annually on February 1 of each year. Those
21 increased rates are reflected in this Application.

22 **B. Client Review of Billing Statements**

23 Pursuant to the Northern District Guidelines, an email enclosing this Interim Application is being
24 sent to the Debtor concurrently with its filing. This email will include the language required by the
25 Guidelines, inviting the Debtor to discuss with the Firm and/or the US Trustee any objections, concerns,
26 or questions the Debtor may have with regard to the requested compensation and reimbursement set forth
27 in the Interim Application.

1 **C. Notice of Application and Hearing**

2 Notice of this Interim Application and the hearing thereon will be provided to the US Trustee, the
3 Debtor, all parties requesting special notice and other interested parties in accordance with the Bankruptcy
4 Rules, Local Bankruptcy Rules, and any applicable orders of the Court. Complete copies of the Interim
5 Application will be promptly furnished to any other party upon specific request. Therefore, notice should
6 be deemed adequate under the circumstances and in accordance with Federal Bankruptcy Rules 2002(a)(6)
7 and 2002(c)(2). Additionally, this Interim Application is available from the claims and noticing agent,
8 KCC, at no charge.

9 **D. No Agreements to Share Compensation**

10 Neither Foley, nor any partners or associates of the Firm, have any agreement or any understanding
11 of any kind or nature to divide, pay over, or share any portion of the fees to be awarded Foley with any
12 other person or attorney, except among members of the Firm.

13 **E. Other Compliance with Large Case Requirements**

14 Attached as Exhibit B through Exhibit F are the exhibits that Foley understands need to be
15 completed and filed together with this Interim Application in order to comply with the Large Case
16 Guidelines. In addition, pursuant to paragraph C.5 of the Large Case Guidelines, Foley provides the
17 following statements:

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INQUIRY	STATEMENTS
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No

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INQUIRY	STATEMENTS
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.	Yes, Foley attorneys billed 19.5 hours of time on these tasks during the Interim Fee Period, with fees of \$14,366.50.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	No, Foley attorneys billed zero hours of time on these tasks, with fees of \$0.00.
If the fee application includes any rate increases since retention: <ol style="list-style-type: none"> i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458? 	Yes, as discussed in Foley's Retention Application, Foley's fees increase annually on February 1.

VI. BASIS FOR ALLOWANCE OF FEES AND EXPENSES

The fees and expenses requested by this Interim Application reflect reasonable compensation for services provided, and reimbursement of necessary expenses incurred, by Foley in acting as general bankruptcy counsel to the Debtor during the Interim Fee Period.

A. The Standard for Allowance of Compensation Pursuant to Section 330(a)

Pursuant to Section 330(a) of the Bankruptcy Code, the Court may award to a professional person reasonable compensation for actual, necessary services rendered, and reimbursement for actual, necessary expenses incurred. Pursuant to Section 331 of the Bankruptcy Code, the Court may award interim compensation and reimbursement to a professional. As set forth above, the fees for which the Firm requests compensation and the costs incurred for which the Firm requests reimbursement are for actual and necessary services rendered and costs incurred.

Section 330(a)(3) provides that in evaluating reasonable compensation, the court should consider the nature, extent, and value of the services provided, taking into account all relevant factors, including,

(a) the time spent in providing such services; (b) the rates charged; (c) whether the services were necessary or beneficial to the estate at the time; (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the matter addressed; (e) whether the professional is certified or otherwise has demonstrated skill and experience in the bankruptcy field; and (f) whether the compensation sought is reasonable based on amounts charged by comparably skilled practitioners in non-bankruptcy cases. *See* 11 U.S.C. § 330(a)(3).

In determining the amount of allowable fees under Section 330(a) of the Bankruptcy Code, courts are to be guided by the same “general principles” as are to be applied in determining awards under the federal fee-shifting statutes, with “some accommodation to the peculiarities of bankruptcy matters.” *Burgess v. Klenske (In re Manoa Finance Co., Inc.)*, 853 F. 2d 687, 691 (9th Cir. 1988). When determining the amount of reasonable compensation to be awarded, the court shall consider the nature, extent, and value of such services, taking into account all relevant factors, including the factors set forth in Section 330(a)(3).

In assessing the propriety of an award of attorneys’ fees, twelve factors relevant to determining such fees were identified in *Johnson v. Georgia Highway Express, Inc.*, 488 F. 2d 714, 717-719 (5th Cir. 1974), a Title VII class action case under the Civil Rights Act of 1964, 42 U. S. C. § 2000 et seq., and *Kerr v. Screen Extras Guild, Inc.*, 526 F. 2d 67, 70 (9th Cir. 1975), *cert. denied*, 425 U. S. 951 (1976): (1) the time and labor required, (2) the novelty and difficulty of the questions, (3) the skill requisite to perform the service properly, (4) the preclusion of other employment by the professional due to acceptance of the case, (5) the customary fee, (6) whether fee is fixed or contingent, (7) time limitations imposed by the client or the circumstances, (8) the amount involved and the results obtained, (9) the experience, reputation, and ability of the professionals, (10) the undesirability of the case, (11) the nature and length of the professional relationship with the client, and (12) awards in similar cases. *See American Benefit Life Ins. Co. v. Baddock (In re First Colonial Corp. of America)*, 544 F.2d 1291 (5th Cir. 1977) (*Johnson* criteria applicable in bankruptcy cases).

1 **B. Foley's Work as Described in this Interim Application Satisfies the Requirements of**
2 **Section 330, and the Request for Compensation Should Be Granted**

3 The time for which compensation is sought is detailed in the Firm's invoices for the Interim Fee
4 Period annexed hereto as **Exhibit G**. Foley's services and time expenditures are reasonable in light of the
5 labor required and outcomes achieved to date in this Chapter 11 Case. The Firm's charges for its
6 professional services are based upon the time, nature, extent, and value of such services and the cost of
7 comparable services in the San Francisco area, other than in a case under the Bankruptcy Code. The
8 compensation the Firm seeks by way of this Interim Application is the customary compensation
9 commonly sought by the Firm and other professionals representing trustees, committees, and debtors in
10 similar circumstances.

11 Foley believes the facts and complex nature of this case and the substantial progress that has
12 occurred to date including, notably, obtaining Court approval of the Debtor's Third Amended Disclosure
13 Statement in order to being the Plan confirmation process, and its significant efforts with respect to the
14 pre-confirmation discovery process, as set forth in detail above, demonstrate that Foley's services were
15 both necessary and beneficial to the estate. Further, Foley believes its attorneys are skilled and have
16 performed well in this case, and that the fees charged by Foley are commensurate with the fees charged
17 by Foley's counterparts engaged in non-bankruptcy specialties of the law.

18 Though Foley has utilized some professionals for fewer than 15 hours during the Interim Fee
19 Period, Foley represents that the use of these professionals was efficient and appropriate under the
20 circumstances because of their expertise needed for discrete issues, and in many cases, their prior work
21 on this case.¹⁵ These professionals often have particular expertise which Foley's bankruptcy attorneys can
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25 ¹⁵ Foley & Lardner LLP is not requesting payment of fees related to six timekeepers due to *de minimis* amounts
26 billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$6,870.00 related to said
27 timekeepers. However, Foley requests payment of fees for the remaining timekeepers who billed fewer than 15
28 hours during the Interim Fee Period, because their expertise is unique and necessary for certain discrete issues in
the case (e.g., trusts and estates, real estate, tax matters, corporate governance, financing, insurance, and bankruptcy
matters), including timekeepers who have spent significant time on this case since its filing in May 2023 or who
will be continuing to work on the case in future time periods.

call upon to review matters quickly without the need for additional research and cost, and their fees should be approved.

C. The Estate Has Sufficient Available Funds

Foley understands that the Debtor has sufficient funds available for the payment of fees and costs requested herein.

VII. CONCLUSION

Foley believes that the services rendered for which compensation is sought in this Interim Application have been beneficial to the estate, that the costs incurred have been necessary and proper, and that the sums requested for the services rendered and the costs incurred are fair and reasonable.

WHEREFORE, Foley respectfully requests that the Court (a) authorize interim allowance and direct payment of fees and costs, (b) award interim compensation and reimbursement of expenses to the Firm in the amount of **\$2,463,042.96** inclusive of all fees and costs for the period from January 1, 2025 through April 30, 2025, consisting of **\$2,442,215.50** of fees (reflecting the reduction for certain *de minimis* billings), and **\$20,827.46** of expenses, and (c) grant such other and further relief as may be appropriate under the circumstances.

DATED: June 16, 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 A

FOLEY RETENTION ORDER

JUNE 15, 2023

EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**FOLEY & LARDNER LLP**

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555 California Street, Suite 1700

San Francisco, CA 94104-1520

The following constitutes the order of the Court.

Signed: June 15, 2023

William J. Lafferty, III
U.S. Bankruptcy Judge*Proposed Counsel for the Debtor
and Debtor in Possession***UNITED STATES BANKRUPTCY COURT****NORTHERN DISTRICT OF CALIFORNIA****OAKLAND DIVISION**

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

**ORDER APPROVING 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 & 2016 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE**

Upon the application (the "Application")¹ filed by The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or the "Bankruptcy Case"), pursuant to sections 327(a), 330, 331, and 1107 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016, for entry of an order authorizing the employment and retention of Foley & Lardner LLP ("Foley") to represent the Debtor as general bankruptcy counsel in the above-captioned case, on the terms described in the Application and as more fully set forth therein; and upon the Declaration of Ann Marie Uetz (the "Uetz")

¹ Capitalized terms not defined herein shall have the meanings

1 Declaration”) and all other submissions filed in support of the Application; and due and proper notice of
2 the Application having been given; and the Court having found that it has jurisdiction over this matter
3 under 28 U.S.C. §§ 157 and 1334, that this is a core proceeding under 28 U.S.C. §§ 157(a)-(b) and
4 1334(b), and that venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409; and the Court
5 being satisfied based on the representations made in the Application and the Uetz Declaration that Foley
6 does not hold or represent any interest adverse to the Debtor’s estate in the above-captioned case and is
7 disinterested under section 101(14) and meets the requirements for employment under section 327(a) of
8 the Bankruptcy Code; and the Court finding that cause exists for the entry of this Order, and for authorizing
9 the employment of Foley & Lardner LLP as counsel for the Debtor effective as of the Petition Date,
10 including that such employment as of the Petition Date is in the best interests of the Debtor’s estate;

11 **IT IS HEREBY ORDERED** that:

- 12 1. The Application is APPROVED as set forth in this Order.
- 13 2. The Debtor is authorized to retain and employ Foley as its general bankruptcy counsel in
14 this case, effective as of the Petition Date, under the terms set forth in the Application.
- 15 3. Foley’s compensation and reimbursement in respect to its fees and expenses incurred
16 representing the Debtor shall be subject to further order of the Court in accordance with the procedures
17 and standards set forth in sections 330 and 331 of the Bankruptcy Code, such Federal Rules of Bankruptcy
18 Procedure and local rules as may be applicable from time to time, and such procedures as may be fixed
19 by order of this Court, as well as the *United States Bankruptcy Court Northern District of California*
20 *Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees*, effective
21 *February 19, 2014*, and the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and*
22 *Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*,
23 *effective November 1, 2013*.
- 24 4. Notwithstanding anything to the contrary in this Order, or the Application, the Court is not
25 approving terms and conditions of Foley’s employment under 11 U.S.C. § 328(a).
- 26 5. In the event of any inconsistency between the Application and this Order, this Order shall
27 govern.

6. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable immediately upon its entry.

7. The Debtor is authorized and empowered to take all action necessary to effectuate the relief granted in this Order.

8. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

APPROVED AS TO FORM:

OFFICE OF THE UNITED STATES TRUSTEE

By: /s/ Jason Blumberg
Jason Blumberg
Trial Attorney

*** END OF ORDER ***

COURT SERVICE LIST

All ECF Recipients.

EXHIBIT B

CUSTOMARY AND COMPARABLE DISCLOSURES WITH FEE APPLICATIONS

(SEE GUIDELINES C.3 FOR DEFINITION OF TERMS USED IN THIS EXHIBIT.)

Category of Timekeeper	Blended Hourly Rate¹⁶	
	BILLED Firm for preceding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner ¹⁷	\$839	\$919
Associate ¹⁸	\$516	\$724
Paralegal ¹⁹	\$287	\$387
All timekeepers aggregated	\$611	\$804

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Foley & Lardner LLP
Date of Application:	June 16, 2025
Interim or Final:	Interim

¹⁶ These amounts include timekeepers whose *de minimis* time has been written off in this Interim Application.

¹⁷ Partner category includes Of Counsel.

¹⁸ Associate category includes Senior Counsel and Special Counsel.

¹⁹ Paralegal category includes Other and Technical Specialist.

EXHIBIT C

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

Name of Professional Individual ²⁰	Initials	Department, Group or Section	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate (January 2025)	Hourly Billing Rate (From February 2025)	Total Hours Billed	Total Compensation
Alexander A. Witz	AAWT	Litigation	Associate, 2024	N/A	\$525	28.90	\$15,172.50
Eloise R. Asfora	ERAS	Litigation	Associate, 2024	N/A	\$550	13.90	\$7,645.00
Elizabeth P. Mazzocco	EPM	Insurance Litigation	Associate, 2014	\$750	N/A	98.00	\$73,500.00
Jack R. Doti*	JRDO	Litigation	Associate, 2023	\$495	N/A	1.70	\$841.50
Joseph S. Harper	JSH	Bankruptcy	Associate, 2016	\$700	\$800	24.00	\$18,020.00
Mary Rofaeil	MRL	Bankruptcy	Associate, 2021	\$570	\$675	119.50	\$78,993.00
Mason Roberts	MR	Litigation	Associate, 2018	\$690	\$795	81.80	\$61,965.00
Matthew Kass	MTKS	Real Estate	Associate, 2023	\$475	\$575	8.20	\$4,415.00
Michael W. Berg	MWBE	Litigation	Associate, 2023	N/A	\$600	10.50	\$6,300.00
Mikaela R. Mitcham	MRM	Litigation	Associate, 2021	\$570	\$675	125.10	\$83,497.50
McGuffey, Nora	NMCG	Bankruptcy	Associate, 2020	\$470	\$700	91.30	\$55,252.00
Shane J. Moses	SJM	Bankruptcy	Of Counsel, 2005	\$750	\$875	431.40	\$360,262.50
Brittnie M. Werner*	BMWE	Litigation	Paralegal, N/A	N/A	\$290	1.10	\$319.00
Janelle C. Harrison	JCH	Bankruptcy	Paralegal, N/A	\$300	\$330	136.10	\$43,791.00
Kerry A. Farrar	KAFA	Litigation	Paralegal, N/A	\$395	\$450	169.90	\$75,525.50
Wendy DelValle*	WD	Litigation	Paralegal, N/A	\$395	N/A	1.00	\$395.00
Ann Marie Uetz	AMUE	Bankruptcy	Partner, 1993	\$925	\$1,050	448.00	\$453,450.00
Eileen R. Ridley	EPK	Litigation	Partner, 1990	\$975	\$1,100	98.40	\$104,740.00
Emil P. Khatchatourian	ERR	Bankruptcy	Partner, 2009	\$800	\$875	101.80	\$86,892.50
Geoffrey S. Goodman	GSG	Bankruptcy	Partner, 1999	\$1,000	\$1,050	91.40	\$93,525.00

²⁰ “*” Denotes an individual who billed fewer than 15 hours and whose time has been written off in the discount listed below.

Name of Professional Individual ²⁰	Initials	Department, Group or Section	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate (January 2025)	Hourly Billing Rate (From February 2025)	Total Hours Billed	Total Compensation
Heidi M. Furlong	HMF	Finance	Partner, 2001	N/A	\$1,100	4.80	\$5,280.00
Jason J. Kohout	JJK	Tax, Benefits & Estate Planning	Partner, 2007	N/A	\$975	2.20	\$2,145.00
Jeff R. Blease	JRBL	Litigation	Partner, 1998	\$1,275	\$1,375	2.10	\$2,837.50
Jonathan Michael Thomas	JMT	Litigation	Partner, 2010	N/A	\$875	79.60	\$69,650.00
Lisa F. Glahn	LFG	Litigation	Partner, 2000	N/A	\$1,200	4.20	\$5,040.00
Mark C. Moore	MCM	Bankruptcy	Partner, 2010	\$825	\$925	259.20	\$230,540.00
Matthew D. Lee	MDL	Bankruptcy	Partner, 2006	\$800	\$875	257.60	\$219,625.00
Thomas F. Carlucci	TFCA	Litigation	Partner, 1987	\$1,325	\$1,375	7.00	\$9,410.00
Alan R. Ouellette	AROU	Litigation	Senior Counsel, 2010	\$800	\$875	20.90	\$18,197.50
Elizabeth P. Mazzocco ²¹	EPM	Insurance Litigation	Senior Counsel, 2014	N/A	\$840	138.90	\$116,676.00
Jake W. Gordon	JWGO	Finance	Senior Counsel, 2017	N/A	\$815	16.40	\$13,366.00
Laura P. Mikeworth	LPM	Real Estate	Senior Counsel, 2017	N/A	\$815	5.20	\$4,238.00
Matthew S. Kiel	MSK	Transactions	Senior Counsel, 2014	N/A	\$775	1.20	\$1,050.00
Mikle S-K Jew*	MSKJ	Litigation	Senior Counsel, 2017	N/A	\$825	5.50	\$4,537.50
Tamar N. Dolcourt	TND	Bankruptcy	Special Counsel, 2009	\$735	\$800	154.80	\$121,214.00
Jacob Stamm*	JS	Finance	Project Assistant, N/A	N/A	\$190	3.70	\$777.00
SUBTOTAL						3,045.30	\$2,449,085.50
REDUCTION FOR <i>DE MINIMIS</i> TIMEKEEPERS						13.00	\$6,870.00
TOTAL						3,032.30	\$2,442,215.50

²¹ Ms. Mazzocco was promoted to Senior Counsel, effective February 1, 2025.

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Foley & Lardner LLP
Date of Application:	June 16, 2025
Interim or Final:	Interim

EXHIBIT D

SUMMARY OF COMPENSATION REQUESTED BY CATEGORY

(SEE GUIDELINES ¶ C.8 FOR PROJECT CATEGORY INFORMATION)

Category	Hours Billed This Fee Period	Total Amount This Fee Period
003 – Automatic Stay	32.20	\$29,926.50
004 – Bankruptcy Litigation/Adversary Proceedings	283.90	\$230,152.50
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues	49.60	\$35,832.50
006 – Case Administration (Docket Updates, WIP and calendar)	80.40	\$33,222.00
007 – Chapter 11 Plan/Plan Confirmation	137.50	\$111,802.00
008 – Communications with Client	120.00	\$114,652.50
009 – Corporate Governance and Board Issues	1.50	\$1,168.50
011 – Cash Management	13.50	\$12,642.50
012 – Disclosure Statement	546.60	\$456,777.00
015 – Executory Contracts/Lease Issues	3.90	\$3,412.50
016 – General Case Strategy (includes calls with client and team calls)	94.90	\$78,976.50
017 – Hearings and Courts Matters	170.60	\$154,737.50
018 – Non-Bankruptcy Litigation	206.80	\$142,705.00
020 – Retention/Billing/Fee Applications for Debtor Professionals	106.20	\$79,865.50
021 – Retention/Fee Applications: Ordinary Course Professionals	12.30	\$9,812.00
022 – Retention/Fee Applications: Other Professionals	40.90	\$31,872.00
025 – U.S. Trustee Issues/Meetings/Communications/Monthly Operating Report	11.90	\$9,246.00
026 – Unsecured Creditors Issues/Communications/Meetings	36.40	\$32,677.50
027 – Real Estate and Real Property Issues	16.80	\$14,780.00
028 – Tort Claims	2.80	\$1,262.50
029 – Non-Tort Proofs of Claim	1.90	\$1,154.00
031 – Insurance Issues (coverage)	476.60	\$369,156.50
032 – Rule 2004 Motions/Discovery/Subpoenas	349.70	\$276,476.50
034 – Other Motion Practice	28.40	\$22,490.00
035 – General Counsel Matters	24.30	\$16,675.00
037 – Financing	30.20	\$26,521.00
038 – Mediation	165.50	\$151,089.50
SUBTOTAL	3,045.30	\$2,449,085.50
REDUCTION FOR <i>DE MINIMIS</i> TIMEKEEPERS	13.00	\$6,870.00
TOTAL	3,032.30	\$2,442,215.50

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Foley & Lardner LLP
Date of Application:	June 16, 2025
Interim or Final:	Interim

EXHIBIT E

SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY

(SEE GUIDELINES ¶ C.8 FOR PROJECT CATEGORY INFORMATION)

Costs/Expense	Amount Billed
Depositions, Transcripts, Exams	\$333.05
Electronic Legal Research Services	\$1,501.38
LSS – eDiscovery Services	\$15,300.00
Meals	\$3,045.73
Other Expenses	\$54.50
Other Fees	\$394.00
Transportation/Travel Expenses	\$198.80
TOTAL	\$20,827.46

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Foley & Lardner LLP
Date of Application:	June 16, 2025
Interim or Final:	Interim

EXHIBIT F

FOLEY BUDGET AND STAFFING PLAN

The Foley attorneys and paraprofessionals staffed on this case, subject to modification depending on further development, are set forth in (1) the Declaration of Ann Marie Uetz in Support of 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, and (2) supplemented as set forth in Exhibit C of this Interim Application, and the Debtor has approved that staffing. Before the Petition Date, Foley estimated the approximate cost per month of its services and expenses for the first 12 months of the Bankruptcy Case with certain months being higher and certain months being lower in amount, and also provided an estimate for all services and expenses in the case assuming a certain duration for the case, and the Debtor has approved that estimate. This estimate has been updated and incorporated into a cash forecast maintained by the Debtor. The fees sought in this Interim Application do not exceed the budget by 10% or more.

EXHIBIT G

FOLEY INVOICES



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: February 28, 2025
Invoice No.: 51019266
Our Ref. No.: 100845-0402

Services through January 31, 2025

Amount due for professional services rendered regarding
Chapter 11 Bankruptcy \$677,459.00

Total Expenses: \$4,579.14

Amount Due: \$682,038.14

Please reference your invoice number 51019266 with your remittance
payable to Foley & Lardner LLP. Payment is due promptly upon receipt

Federal Employer Number:
39-0473800

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51019266

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Foley & Lardner LLP

February 28, 2025

Professional Services Detail**003 Automatic Stay**

01/06/25	EPM	Review Committee's reply in support of motion to lift automatic stay (.5); strategize with M. Moore, E. Ridley, and M. Lee regarding the Committee's motion to lift automatic stay (1.0); review case law cited in recent filings (1.5).	3.00	\$2,250.00
01/06/25	ERR	Review reply by Committee regarding motion for relief from stay and strategize regarding preparation for the hearing.	0.80	\$780.00
01/06/25	ERR	Review draft reply outline regarding motion for relief from stay (including review of opposition papers).	1.60	\$1,560.00
01/06/25	MRL	Analyze the Committee's reply to the Debtor's objection to the relief stay motion.	0.20	\$114.00
01/12/25	MDL	Email exchange with T. Schiavoni (O'Melveny) regarding potential additional grounds of opposition to Committee lift stay motion.	0.10	\$80.00
01/15/25	SJM	Review arguments and transcripts regarding timing for state court trials in light of court concerns regarding same with respect to Committee lift stay motion (.8); email correspondence with case team regarding same (.3).	1.10	\$825.00
01/15/25	TFCA	Review emails regarding motion to lift stay (.2); telephone call with J. Blease regarding same (.2); review response and draft response regarding same (.3); attend call with M. Moore and A. Ouellette regarding same (.3); review documents in support of opposition (.2); review transcript of Judge's questions regarding same (.3).	1.50	\$1,987.50
01/16/25	JRDO	Research Alameda County Superior Court Complex department's calendar for active list of calendared trials in support of opposition for lifting stay of superior court cases.	1.50	\$742.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

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Foley & Lardner LLP

February 28, 2025

01/16/25	TFCA	Review emails to prepare for court regarding motion to lift stay (.8); attend court (1.5); review and respond to J. Doti regarding Alameda court calendars (.2).	2.50	\$3,312.50
01/17/25	EPK	Coordinate with M. Moore regarding status of the Committee's stay relief motion and case-management issues relating to same.	0.20	\$160.00
01/23/25	AMUE	Communication with B. Weisenberg regarding lift stay order (.3); review proposed order (.4) and provide advice regarding same (.5).	1.20	\$1,110.00
01/23/25	SJM	Email to case team regarding revisions to order denying relief from stay.	0.40	\$300.00
01/26/25	SJM	Review transcripts in order to identify holding regarding non-debtor co-defendants in connection with Committee lift stay motion (.4); revise proposed order on lift stay motion (.2); prepare revised forms of orders on Committee standing motions (.3).	0.90	\$675.00
01/28/25	AMUE	Revisions to order denying motion for relief from stay (.6) and communications with B. Weisenberg regarding same (.3).	0.90	\$832.50
Task Total:			15.90	\$14,729.00

004 Bankruptcy Litigation/Adversary Proceedings

01/02/25	EPM	Review filings responding to Committee's various motions.	0.70	\$525.00
01/02/25	GSG	Review draft of property of the estate stipulation (.2); correspondence with A. Uetz regarding same (.2).	0.40	\$400.00
01/02/25	SJM	Analyze issue regarding restricted funds in connection with OPF standing motion (.4) email correspondence with A. Uetz and G. Goodman regarding same (.2).	0.60	\$450.00
01/03/25	AMUE	Communication with R. Manns regarding pending litigation.	0.60	\$555.00
01/03/25	MCM	Prepare for oral argument in contested hearings on Committee motions scheduled for January 8, 2025 in RCBO bankruptcy case.	1.60	\$1,320.00

ROMAN CATHOLIC BISHOP OF OAKLAND

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Foley & Lardner LLP

February 28, 2025

01/05/25	GSG	Review adversary issues and key points for motion to dismiss.	0.40	\$400.00
01/05/25	MCM	Revise draft speaking outline for oral argument on Committee motions in RCBO bankruptcy case.	1.00	\$825.00
01/06/25	GSG	Prepare for hearing on 1-8 (1.9); review Committee issues related to same (.4).	2.30	\$2,300.00
01/06/25	MCM	Analyze Committee filings in connection with lift-stay and derivative standing motions (1.0); prepare for contested hearing regarding same scheduled for January 8, 2025 (1.2).	2.20	\$1,815.00
01/06/25	NMCG	Analyze the adversary complaints filed by Committee (1.0) and confer regarding the same with G. Goodman (.6).	1.60	\$912.00
01/06/25	NMCG	Review reply filed by Committee in support of their derivative standing motion (.5) and discuss with G. Goodman (.2); prepare for derivative standing motion hearing with G. Goodman (.8).	1.50	\$855.00
01/06/25	SJM	Brief review of replies filed in support of Committee motions set for January 8 (.4); prepare summary of replies for client update (.8).	1.20	\$900.00
01/07/25	EPM	Continue analysis of cases cited in recent filings.	4.30	\$3,225.00
01/07/25	GSG	Review Committee reply brief on derivative standing (.3); prepare for hearing on 1-8, including review of key cases and briefs (4.2); meet with team regarding same (1.3); review property of estate stipulation and edits to same (.4); telephone conference with M. Lee regarding same (2); review arguments for MTD adversary proceedings (.7); meet with team regarding same (.5).	7.60	\$7,600.00
01/07/25	MDL	Strategize with M. Moore regarding hearing on Committee motions and insurers' arguments at same.	0.30	\$240.00
01/07/25	NMCG	Meeting with Foley team regarding adversary proceedings filed by Committee.	0.80	\$456.00
01/07/25	SJM	Review Committee adversary complaints in preparation for meeting regarding responses to same (.6); meeting with G. Goodman and N. McGuffey regarding same (.4).	1.00	\$750.00

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Foley & Lardner LLP

February 28, 2025

01/08/25	NMCG	Work on outlines for motions to dismiss adversary proceedings (2.0); research relevant case law regarding the same (1.4).	3.40	\$1,938.00
01/08/25	SJM	Prepare for hearing on Committee motion for standing regarding insurance litigation (1.8); confer with M. Moore and G. Goodman regarding approach to hearings (.4).	2.20	\$1,650.00
01/08/25	SJM	Conference call with M. Lee, M. Moore, G. Goodman and insurer counsel regarding hearing on Committee motions.	0.90	\$675.00
01/09/25	GSG	Review Committee discovery issues and bylaws question (.4); review motion to dismiss adversary issues (.7); review proposed stipulation on adversaries (.3); respond to Committee regarding same (.1).	1.50	\$1,500.00
01/09/25	NMCG	Work on outline to motions to dismiss (4.0); research relevant case law in support (3.0); discussion with G. Goodman regarding the same (.5).	7.50	\$4,275.00
01/10/25	GSG	Review MTD adversary issues and arguments on each count.	0.70	\$700.00
01/10/25	NMCG	Continue working on outline for motion to dismiss (2.5); research relevant case law regarding the same (2.5).	5.00	\$2,850.00
01/11/25	NMCG	Draft motion to dismiss the Committee's adversary proceeding.	5.00	\$2,850.00
01/12/25	NMCG	Continue drafting the motion to dismiss Committee adversary proceeding.	4.00	\$2,280.00
01/13/25	AMUE	Meeting with M. Kemner regarding declarations in support of litigation responses (.6); follow-up notes regarding same (.3).	0.90	\$832.50
01/13/25	AMUE	Communication with R. Manns regarding adversary proceedings (.4); strategize with G. Goodman regarding motions to dismiss (.6); review arguments in support of dismissal (1.1).	2.10	\$1,942.50
01/13/25	GSG	Draft summary of litigation matters and open issues related to same (.8); telephone conference with M. Kemner, R. Manns and A. Uetz regarding same (.6).	1.40	\$1,400.00

ROMAN CATHOLIC BISHOP OF OAKLAND

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Foley & Lardner LLP

February 28, 2025

01/13/25	MCM	Prepare for continued hearing on Committee motions and potential rulings regarding same (.4); analysis of issues raised in Committee adversary proceedings (.6).	1.00	\$825.00
01/13/25	NMCG	Continue drafting the motion to dismiss Committee adversary proceeding.	5.20	\$2,964.00
01/14/25	MCM	Analysis of outstanding Committee issues and potential rulings prior to hearing on January 16.	0.50	\$412.50
01/14/25	NMCG	Continue drafting the motion to dismiss committee adversary proceeding.	4.90	\$2,793.00
01/15/25	GSG	Review restricted fund issues (.3); review Court's comments on property of the estate points (.3); correspondence with team related to same (.3); analyze approach to OPF argument in light of same (.4); correspondence with R. Manns regarding call on motion to dismiss (.1).	1.40	\$1,400.00
01/15/25	MCM	Attend oral ruling on Committee motion for derivative standing regarding the insurance coverage litigation (.5); prepare for additional argument on Committee lift-stay motion, including conference call with Foley team handling state-court litigation (1.5).	2.00	\$1,650.00
01/15/25	NMCG	Continue drafting the motion to dismiss Committee adversary proceeding.	3.20	\$1,824.00
01/15/25	SJM	Analyze approach on standing motion regarding OPF in light of Court's comments (1.1); draft email to G. Goodman regarding same (.5).	1.60	\$1,200.00
01/15/25	SJM	Attend oral ruling on Committee standing motion regarding insurance litigation (partial) (.4); emails with case team regarding same (.2).	0.60	\$450.00
01/16/25	NMCG	Continue drafting the motion to dismiss Committee adversary proceeding.	3.80	\$2,166.00
01/16/25	SJM	Attend (for part) call with G. Goodman and R. Manns regarding approach to Committee adversary complaints against Debtor and NDCEs.	0.40	\$300.00
01/17/25	SJM	Draft proposed order denying standing motion regarding insurance litigation.	0.40	\$300.00

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Foley & Lardner LLP

February 28, 2025

01/20/25	AMUE	Review proposed order denying Committee motion for derivative standing regarding insurance coverage litigation.	0.40	\$370.00
01/20/25	GSG	Review A. Bardos correspondence on OPF issues.	0.20	\$200.00
01/21/25	GSG	Review motion to dismiss issues for adversary proceedings.	0.60	\$600.00
01/21/25	NMCG	Attend oral ruling on the OPF derivative standing motion (partial) (.5); conference regarding same and other motions to dismiss with G. Goodman (.2).	0.70	\$399.00
01/21/25	SJM	Revise motion to dismiss Committee complaint for declaratory relief regarding OPF and churches.	2.80	\$2,100.00
01/21/25	SJM	Review Committee edits to proposed order denying standing motion regarding insurance litigation (.2); email correspondence with case team regarding same (.2).	0.40	\$300.00
01/22/25	GSG	Review drafts of motion to dismiss in adversary proceedings (2.6); edit same (4.4); correspondence with R. Manns regarding same (.2); telephone conference with S. Moses and N. McGuffey regarding same (.8); review property of the estate stipulation issues (.2).	8.20	\$8,200.00
01/22/25	NMCG	Revise motions to dismiss and briefs in support for the two adversary proceedings and update with more case law (3.2); discuss the same with G. Goodman and S. Moses (.8).	4.00	\$2,280.00
01/22/25	NMCG	Review OPF objection to claim (.6) and begin drafting response (1.4).	2.00	\$1,140.00
01/22/25	SJM	Calls with P. Bongiovanni regarding use of OPF loan proceeds in connection with count 5 of Committee complaint (.7); analyze facts related to use of OPF loan funds in connection with same (1.7); email to G. Goodman regarding same (.4).	2.80	\$2,100.00
01/22/25	SJM	Revise motion to dismiss Committee complaint against Debtor and NDCEs.	2.10	\$1,575.00
01/23/25	EPK	Advise N. McGuffey regarding transactional and structural issues relating to the Oakland Parochial Fund and the OPF debt claim.	0.20	\$160.00

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Foley & Lardner LLP

February 28, 2025

01/23/25	GSG	Review M. Kemner's comments to motions to dismiss (.3); review draft of response to OPF claim objection (.6); edit same (1.2); review drafts of OPF and other entities' motions to dismiss (1.0); telephone conference and correspondence with R. Manns regarding same (.4); analyze and address motion to dismiss issues (1.4).	4.90	\$4,900.00
01/23/25	NMCG	Revise the motion to dismiss briefs (4.0); discuss the same with G. Goodman and S. Moses over email and telephone (1.0).	5.00	\$2,850.00
01/23/25	NMCG	Continue working on the response to objection to OPF Claim.	1.50	\$855.00
01/23/25	SJM	Work on identifying exhibits for motions to dismiss Committee complaints (.6); email correspondence with G. Goodman and N. McGuffey regarding same (.4); analyze issues regarding confidentiality of potential exhibits (.8); confer with N. McGuffey and G. Goodman regarding approach to implementing client comments on motions (.6).	2.40	\$1,800.00
01/23/25	SJM	Further comments to draft motions to dismiss Committee complaints.	1.20	\$900.00
01/23/25	SJM	Review draft response to Committee objection to OPF claim.	0.70	\$525.00
01/24/25	AMUE	Meeting with S. Moses to discuss orders denying Committee's three pending motions (.3) and revisions to proposed orders (.6).	0.90	\$832.50
01/24/25	GSG	Edit motions to dismiss adversaries (2.6); telephone conferences and correspondence with R. Manns, S. Moses and N. McGuffey regarding same (.8).	3.40	\$3,400.00
01/24/25	MDL	Revise brief in support of motion to dismiss substantive consolidation adversary proceeding.	0.40	\$320.00
01/24/25	MDL	Revise brief in support of motion to dismiss churches/OPF adversary proceeding.	0.60	\$480.00
01/24/25	NMCG	Draft declaration in support of response to OPF claim (1.0); discuss with S. Moses and G. Goodman regarding the same (.5).	1.50	\$855.00

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01/24/25	NMCG	Revise motions to dismiss and related briefs (4.0); discuss with S. Moses and G. Goodman regarding the same (.5).	4.50	\$2,565.00
01/24/25	SJM	Assist with finalizing motions to dismiss.	1.40	\$1,050.00
01/24/25	SJM	Email to N. McGuffy regarding preparation of notices of hearing on motions to dismiss (.2); review draft notices (.4).	0.60	\$450.00
01/24/25	SJM	Calls with counsel for OPF and other NDCEs regarding motions to dismiss.	0.50	\$375.00
01/24/25	SJM	Calls with G. Goodman and N. McGuffey regarding finalizing motions to dismiss Committee complaints (.4); final revisions to motion to dismiss complaint regarding OPF and churches (2.0); final revisions of motion to dismiss complaint regarding RCWC and other NDCEs (1.6).	4.00	\$3,000.00
01/24/25	SJM	Final revisions to statement in response to objection to OPF claim and supporting declaration (.7); emails and call with A. Bardos regarding same (.3); attention to filing of same (.1).	1.10	\$825.00
01/27/25	EPK	Email correspondence with M. Lee, S. Moses, and J. Harper regarding 9019 motion to approve settlement with the Bennett Trust.	0.20	\$160.00
01/27/25	GSG	Review discovery conference issues (.2); review property of the estate stipulation issues (.2).	0.40	\$400.00
01/27/25	JSH	Attention to 9019 motion re Bennett Trust settlement.	0.20	\$140.00
01/27/25	MCM	Analyze proposed stipulations and orders from Committee on various issues following denial of all three motions filed thereby.	0.50	\$412.50
01/27/25	MDL	Provide instruction to J. Harper regarding motion to approve settlement with Bennett Trust.	0.30	\$240.00
01/27/25	SJM	Respond to M. Lee, and J. Harper regarding Bennett Trust settlement.	0.30	\$225.00
01/28/25	JSH	Work on 9019 motion re Bennett Trust settlement.	0.20	\$140.00
01/28/25	SJM	Email correspondence with case team regarding approach to scheduling in Committee adversary proceedings.	0.40	\$300.00

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01/30/25	GSG	Correspondence with B. Weisenberg regarding property of the estate call.	0.10	\$100.00
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Task Total:	149.30	\$110,229.50
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005 Bar Date Motion/ Claims Reconcil./ Claim Reconciliation Issues

01/23/25	MCM	Update claims review and associated funnel in preparation for discussion with Foley team.	0.60	\$495.00
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01/30/25	KAFA	Prepare lists and spreadsheets of all abuse cases and their affiliations with schools, parishes, RCBO-affiliated entities like RCWC, and third-party entities such as religious orders per E. Khatchatourian.	0.40	\$158.00
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Task Total:	1.00	\$653.00
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006 Case Administration (docket updates, WIP, and calendar)

01/02/25	EPK	Review dates and deadlines for the Committee's adversary proceeding (.1); review updates to master case calendar and key dates timeline prepared by J. Harrison (.1).	0.20	\$160.00
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01/02/25	JCH	Revise Timeline and Master Case Calendar (.5); calendar deadlines in Committee adversary proceedings (.5); update daily docket report (.2).	1.20	\$360.00
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01/03/25	JCH	Update daily docket report.	0.50	\$150.00
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01/06/25	JCH	Update Timeline and Master Case Calendar (.5); update daily docket report(.5).	1.00	\$300.00
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01/07/25	JCH	Prepare (.4) and file (.1) Notice of Core Service List as of January 7, 2025; update daily docket report (.5).	1.00	\$300.00
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01/08/25	JCH	File Motion to Amend Mediation Orders, Declaration in Support and Application to Shorten Notice (.5); update daily docket report (.5).	1.00	\$300.00
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01/09/25	JCH	Update daily docket report.	0.20	\$60.00
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01/10/25	JCH	Finalize (.4) and file (.1) Notice of Hearing on Debtor's Motion for Global Mediation and calendar same; update daily docket report (.7).	1.20	\$360.00
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01/13/25	EPK	Confer with J. Harrison and J. Harper regarding master case calendar and key dates timeline updates for this week, including tracking of dates and deadlines in the Committee's adversary proceedings.	0.20	\$160.00
01/13/25	JCH	Update Timeline and Master Case Calendar (.5); update daily docket report (.5).	1.00	\$300.00
01/13/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.60	\$420.00
01/13/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.90	\$513.00
01/14/25	JCH	Update daily docket report.	0.50	\$150.00
01/15/25	JCH	Finalize (.4) and file (.1) reply in support of motion for global mediation and declaration in support; update daily docket report (.5).	1.00	\$300.00
01/16/25	JCH	Update daily docket report.	0.50	\$150.00
01/17/25	JCH	Update daily docket report.	0.50	\$150.00
01/21/25	JCH	Calendar continued hearing on disclosure statement (.2); prepare and file Notice of Filing of Summary of Prepetition Wages and Expenses (.5); update daily docket report (.5); prepare draft pro hac vice application for E. Mazzocco and request certificate of good standing regarding same (.5).	1.70	\$510.00
01/22/25	EPK	Confer with S. Moses regarding upcoming Bankruptcy Code deadlines to be further extended.	0.10	\$80.00
01/22/25	JCH	Email hearing transcripts and order to A. Uetz regarding multiple matters (.5); update daily docket report (.2).	0.70	\$210.00
01/23/25	JCH	Update daily docket report.	0.50	\$150.00
01/23/25	JCH	Email hearing transcripts and order to A. Uetz regarding multiple matters (.5); calendar continued hearings and response deadlines (.5).	1.00	\$300.00
01/24/25	JCH	Update Master Case Calendar and Timeline and send same to J. Harper for review (.5); update daily docket report (.5).	1.00	\$300.00

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01/26/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.50	\$285.00
01/27/25	EPK	Develop strategy with Foley restructuring team relating to further extension of removal deadline (.2); consult with J. Harper regarding this week's updates to the master case calendar (.2).	0.40	\$320.00
01/27/25	JCH	Finalize (.4) and file (.1) pro hac vice application for E. Mazzocco; circulate updated Master Case Deadline and Timeline (.5); update daily docket report (.5).	1.50	\$450.00
01/27/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.80	\$560.00
01/27/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	1.00	\$570.00
01/28/25	JCH	Update daily docket report.	0.50	\$150.00
01/29/25	JCH	File Debtor's Certificate of Compliance regarding OCP Order (.2); update daily docket report (.5).	0.70	\$210.00
01/30/25	JCH	Update daily docket report.	0.50	\$150.00
01/31/25	JCH	Update Master Case Calendar and Timeline and calendar related reoccurring deadlines (.5); update daily docket report (.5).	1.00	\$300.00
Task Total:			23.40	\$8,678.00

007 Chapter 11 Plan/ Plan Confirmation

01/01/25	MDL	Continue to revise amended plan of reorganization.	4.30	\$3,440.00
01/02/25	AMUE	Revisions to plan.	1.50	\$1,387.50
01/03/25	MDL	Revise amended plan of reorganization in advance of filing.	3.60	\$2,880.00
01/05/25	MDL	Strategize regarding satisfaction of section 1129(a)(7)(A)(ii).	0.40	\$320.00
01/08/25	MDL	Evaluate U.S. Trustee objection regarding post-confirmation quarterly reports and other U.S. Trustee-related objections.	0.40	\$320.00

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01/09/25	JSH	Research regarding liquidation analysis and sec. 1129(a)(7) issues.	1.00	\$700.00
01/15/25	MCM	Conference call with Foley insurance team regarding plan issues.	0.80	\$660.00
01/22/25	MRL	Confer with M. Moore and M. Mitcham regarding status of amending the plan and research on liquidation analysis (1.0); begin researching how courts analyze liquidation analysis for plan confirmation (.8).	1.80	\$1,026.00
01/27/25	MRL	Continue researching how courts analyze liquidation analysis for plan confirmation.	0.80	\$456.00
01/28/25	MRL	Continue researching how courts analyze liquidation analysis for plan confirmation.	1.60	\$912.00
01/29/25	MCM	Analyze memorandum concerning certain issues raised during January 21, 2025 hearings entered by the Court (.6); email correspondence with Foley team regarding same (.3).	0.90	\$742.50
01/29/25	MRL	Finalize researching how courts analyze liquidation analysis for plan confirmation (1.1); draft an email to M. Moore regarding the research (.3).	1.40	\$798.00
01/30/25	MDL	Strategize with M. Moore regarding possible additional plan terms and plan funding issues.	0.40	\$320.00
01/30/25	MRL	Confer with M. Moore regarding research on how courts analyze liquidation analysis for plan confirmation.	0.30	\$171.00
Task Total:			19.20	\$14,133.00

008 Communications with Client

01/06/25	MDL	Meet with P. Bongiovanni, A. Bardos, and real estate asset identification team regarding plan funding issues.	0.70	\$560.00
01/06/25	SJM	Draft update for client regarding recent filings.	1.30	\$975.00
01/08/25	AMUE	Draft privileged communication to client leadership regarding pending Committee motions and next steps.	0.90	\$832.50

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01/08/25	AMUE	Communications with M. Kemner regarding privileged issue concerning Committee.	0.80	\$740.00
01/09/25	AMUE	Communication with finance team regarding cash forecast.	0.30	\$277.50
01/09/25	SJM	Draft client update regarding January 8 hearings.	0.60	\$450.00
01/13/25	AMUE	Draft communication to Bishop Barber regarding possible global mediation.	0.60	\$555.00
01/13/25	AMUE	Communication with M. Kemner regarding privileged issue concerning adversary proceedings.	0.70	\$647.50
01/13/25	AMUE	Communication with D. Flanagan regarding cash runway issues.	0.50	\$462.50
01/13/25	AMUE	Draft lengthy memorandum for Bishop Barber concerning strategy and status on three motions and two adversary proceedings filed by the Committee, and regarding disclosure statement proceedings.	1.40	\$1,295.00
01/15/25	AMUE	Provide advice to M. Kemner regarding privileged issue concerning representation of certain employees.	0.80	\$740.00
01/15/25	SJM	Draft update to client regarding ruling on insurance litigation standing motion.	0.60	\$450.00
01/16/25	AMUE	Draft privileged communication to Bishop Barber regarding litigation status and strategy.	1.00	\$925.00
01/16/25	AMUE	Communication with M. Kemner regarding representation of certain employees.	0.60	\$555.00
01/20/25	AMUE	Multiple communications with A. Bardos regarding litigation filed by the Committee regarding OPF and strategy related to same.	1.00	\$925.00
01/21/25	AMUE	Debrief meeting with client leadership regarding hearing.	0.50	\$462.50
01/21/25	AMUE	Draft communication for client regarding privileged issue.	1.20	\$1,110.00
01/21/25	AMUE	Review A. Bardos and C. de Quesada emails regarding OPF and respond to same.	1.20	\$1,110.00
01/21/25	SJM	Draft update to client on disclosure statement hearing.	0.30	\$225.00

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01/22/25	AMUE	Two telephone conferences with M. Kemner regarding privileged issue.	0.80	\$740.00
01/22/25	AMUE	Summary memo to client regarding disclosure statement and insurance discovery responses.	1.20	\$1,110.00
01/22/25	AMUE	Summary memo to client regarding motions.	0.40	\$370.00
01/24/25	AMUE	Meeting with A. Bardos regarding privileged mediation matter (1.0); meeting with M. Kemner regarding privileged mediation matter (.4); communication with D. Flanagan regarding privileged mediation matter (.5); review communication received from P. Bongiovanni (.3).	2.20	\$2,035.00
01/26/25	AMUE	Draft memorandum to Bishop Barber concerning mediation.	0.60	\$555.00
01/26/25	AMUE	Draft memorandum for Bishop Barber concerning privileged matter related to meeting with Judge Sontchi.	1.10	\$1,017.50
01/26/25	MCM	Analyze client status update dated January 26 based on prior pleadings.	0.40	\$330.00
01/27/25	AMUE	Communications with client leadership regarding mediation.	0.50	\$462.50
01/29/25	AMUE	Communications with finance team regarding privileged issue related to litigation.	1.00	\$925.00
01/29/25	MDL	Telephone conference with A. Bardos, P. Bongiovanni, and S. Marciniak regarding Livermore property rezoning and easement progress.	0.40	\$320.00
01/30/25	AMUE	Meeting with M. Kemner and M. Lee regarding litigation strategy.	0.60	\$555.00
01/30/25	MCM	Conference call with client parties regarding parish issues.	0.60	\$495.00
01/30/25	SJM	Draft update to client regarding continued disclosure statement hearing.	0.60	\$450.00
01/31/25	SJM	Prepare updated report to client on results of further disclosure statement hearing.	0.60	\$450.00
Task Total:			26.00	\$23,112.50

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009 Corporate Governance and Board Issues

01/29/25	KAFA	Assist R. Medeiros with audit spreadsheet information.	0.30	\$118.50
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Task Total:	0.30	\$118.50
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011 Cash Management

01/06/25	EPK	Email correspondence from A. Bardos of RCBO regarding donations and related parishioner communications (.3); analyze property of the estate issues relating to same (.5).	0.80	\$640.00
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01/07/25	EPK	Revise proposed response to heirs of deceased donors regarding restricted gifts (.4); email correspondence with A. Bardos regarding comments to proposed response (.2).	0.60	\$480.00
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01/09/25	SJM	Prepare notice of payment under cash management order.	0.30	\$225.00
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01/13/25	AMUE	Provide advice to A. Bardos regarding cash management issue involving CCCEB.	0.50	\$462.50
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01/13/25	MDL	Evaluate Committee inquiry regarding CCCEB quarterly payment.	0.60	\$480.00
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01/13/25	SJM	Analyze approach in light of Committee questions regarding CCCEB funding notice (.2); email to case team regarding same (.1).	0.30	\$225.00
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01/14/25	MDL	Email exchange with C. Restel (Lowenstein) regarding CCCEB rent issue.	0.30	\$240.00
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01/23/25	SJM	Call with D. Flanagan regarding cash management reporting issues.	0.30	\$225.00
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01/27/25	SJM	Prepare notice of church bank account openings and closings.	0.50	\$375.00
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01/28/25	SJM	Review calculation of U.S. Trustee fees (.2); email to A. Bardos regarding same (.1).	0.30	\$225.00
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Task Total:	4.50	\$3,577.50
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012 Disclosure Statement

01/01/25	EPM	Revise draft disclosure statement.	0.90	\$675.00
01/01/25	MCM	Email correspondence with Foley team regarding additional necessary revisions to disclosure statement prior to filing of amended version on 1/3/2025 (.5); review inserts from various parties and incorporate into draft document (.4); analyze issues in connection with selection of Survivors' Trustee and Abuse Claims Reviewer (.3).	1.20	\$990.00
01/01/25	SJM	Draft discussion of OPF for amended disclosure statement (1.6); confer with M. Lee regarding disclosure statement discussion of CCCEB settlement (.2); draft expanded discussion of CCCEB settlement for amended disclosure statement (1.3); further revisions to disclosure statement to address other matters (1.7).	4.80	\$3,600.00
01/02/25	AMUE	Revisions to disclosure statement per Court's hearing on motion to approve disclosure statement (3.6); review transcript and notes from hearing to confirm revisions (1.1).	4.70	\$4,347.50
01/02/25	MCM	Confer with Foley team regarding additional plan and disclosure statement revisions prior to filing (.5); revise disclosure statement to include additional discussion of creditor choices and distribution options (2.0); incorporate additional revisions based on Court instructions from prior hearing following discussion with S. Moses (1.2); email correspondence with Foley team updating remaining tasks and necessary amendments (.7); email correspondence regarding updated ballots and other documents (.3); review and revise same prior to filing (1.0).	5.70	\$4,702.50
01/02/25	MDL	Strategize regarding additional terms for disclosure statement and possible additional modifications to amended plan.	1.40	\$1,120.00
01/02/25	MDL	Draft inserts for amended disclosure statement on subjects ordered by Judge Lafferty.	2.20	\$1,760.00
01/02/25	MRL	Confer with N. McGuffey and M. Moore regarding status of the disclosure statement.	0.20	\$114.00

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01/02/25	NMCG	Review executive summary of disclosure statement (.8); discuss the same with M. Moore (.2).	1.00	\$570.00
01/02/25	SJM	Revise disclosure statement discussion of Committee litigation (1.6); revise forms of ballot for Class 4 and Class 5 to incorporate opt-out election (1.1); prepare revised proposed order approving disclosure statement (.8).	3.50	\$2,625.00
01/03/25	AMUE	Revisions to disclosure statement to align with Court's ruling.	3.20	\$2,960.00
01/03/25	AMUE	Work on liquidation analysis revisions, including discussion with C. Moore.	1.80	\$1,665.00
01/03/25	JCH	Prepare draft notice of filing of redlines of amended disclosure statement and plan (.5); email correspondence with Foley team regarding amended plan and disclosure filings (.6); prepare redlines of disclosure statement, plan and liquidation analysis to be filed with notice (.5); prepare exhibits to disclosure statement for filing (.8); file amended plan and disclosure statement (.5); finalize (.4) and file (.1) notice of filing of redlines and revised order and ballots.	3.40	\$1,020.00
01/03/25	MCM	Incorporate latest revisions to disclosure statement and Survivors' Trust documents based on revised plan (1.5); meeting with M. Lee to walk through alignment of documents to be filed (1.0); meeting with A. Uetz and M. Lee regarding revisions to disclosure statement and liquidation analysis (1.0); final revisions to Survivors' Trust documents and finalization of amended disclosure statement prior to filing same (1.5); conference call with M. Lee regarding notice and filing of various documents (.4); conference call with S. Moses regarding form ballot (.4); approve documents for filing (.5).	6.30	\$5,197.50
01/03/25	MDL	Revise amended disclosure statement in advance of filing same.	4.00	\$3,200.00
01/03/25	MRL	Confer with M. Lee and M. Moore regarding the status of the amended disclosure statement (.2); review and revise the amended disclosure statement to conform to the amended plan (1.7).	1.90	\$1,083.00

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01/03/25	SJM	Direct Verita regarding service of disclosure statement, plan, and notice of redlines of disclosure statement pursuant to FRBP 3017.	0.20	\$150.00
01/03/25	SJM	Assist with final revisions to amended disclosure statement (.2); finalize liquidation analysis, including final review of same (.3); final review of amended disclosure statement (.6); final review of plan (.4); final review of exhibits to disclosure statement (.3); assist with finalizing plan and amended disclosure statement for filing (1.1).	2.90	\$2,175.00
01/03/25	SJM	Work on notice of redlines of disclosure statement and related documents (1.6); further revisions to forms of ballots and proposed order approving disclosure statement (.6); revise draft notice (.3); assist with finalizing same (.6).	3.10	\$2,325.00
01/06/25	MCM	Prepare for continued disclosure statement hearing and anticipated receipt of proposed Committee letter following filing of amended disclosure statement and plan.	0.80	\$660.00
01/06/25	MDL	Strategize with M. Moore regarding amended disclosure statement and additional submissions to be made regarding same.	0.20	\$160.00
01/06/25	MDL	Strategize for reply in support of amended disclosure statement.	0.10	\$80.00
01/08/25	JSH	Research regarding liquidation analysis and sec. 1129(a)(7) issues.	0.20	\$140.00
01/08/25	MCM	Prepare for continued hearing on approval of disclosure statement.	1.00	\$825.00
01/08/25	MDL	Revise Class 4 and Class 5 ballots to account for U.S. Trustee's objection.	0.70	\$560.00
01/09/25	SJM	Revise draft notice of confirmation hearing to reflect revisions to third-party release language (.8); prepare notice of filing for revised ballots and notice of confirmation hearing (.6); further revisions to draft ballots (.4); email to M. Lee regarding updated forms and related issues (.2).	2.00	\$1,500.00
01/10/25	JCH	Compile exhibits, finalize and file Notice of Filing of Revised Plan Ballots and Confirmation Hearing Notice with redlines.	0.80	\$240.00

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01/10/25	JSH	Research regarding liquidation analysis and sec. 1129(a)(7) issues.	3.40	\$2,380.00
01/10/25	MCM	Prepare for contested hearing on approval of amended disclosure statement (1.2); review Committee objection and attached exhibits (.5).	1.70	\$1,402.50
01/10/25	MDL	Further revise Class 4 and Class 5 ballots.	0.40	\$320.00
01/10/25	MDL	Revise notice of hearing on confirmation of plan.	0.30	\$240.00
01/10/25	MDL	Email correspondence with J. Blumberg (U.S. Trustee's office) regarding revised plan ballots and notice of confirmation hearing.	0.20	\$160.00
01/10/25	SJM	Initial review of Committee objection to revised disclosure statement.	0.60	\$450.00
01/10/25	SJM	Review transcript of disclosure statement hearing to identify resolution of U.S. Trustee objections (.4); review U.S. Trustee objection to disclosure statement regarding same (.3); confer with M. Lee regarding same (.5).	1.20	\$900.00
01/11/25	MCM	Analyze Committee objection to disclosure statement.	0.80	\$660.00
01/11/25	SJM	Summarize Committee arguments in opposition to approval of disclosure statement.	2.80	\$2,100.00
01/12/25	MCM	Analyze Committee objection to amended disclosure statement and memo to file regarding same from S. Moses (1.0); draft email memorandum summarizing responses to Committee objection in anticipation of draft reply (1.5).	2.50	\$2,062.50
01/12/25	SJM	Begin drafting reply in support of disclosure statement.	0.90	\$675.00
01/13/25	MCM	Analysis of Committee objection to amended disclosure statement (.7); conference call with Foley team to discuss same (.5); draft reply to Committee objection (1.3).	2.50	\$2,062.50
01/13/25	MDL	Analyze additional case law relevant to 1129(a)(7) issue.	0.50	\$400.00
01/13/25	MDL	Analyze Committee's objection to amended disclosure statement.	0.60	\$480.00

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01/13/25	MDL	Draft inserts to reply brief in support of motion to approve disclosure statement regarding 1129(a)(7) issue and Committee appendix issue.	2.20	\$1,760.00
01/13/25	MDL	Strategize for reply brief in support of motion to approve disclosure statement.	1.60	\$1,280.00
01/13/25	SJM	Analyze approach to responding to various Committee objections to disclosure statement in preparation for meeting regarding drafting reply (.7); meeting with M. Lee and M. Moore regarding preparing reply (1.6); work on drafting various sections of reply brief (3.1).	5.40	\$4,050.00
01/14/25	AMUE	Revisions to response brief in opposition to Committee's objection to disclosure statement (2.4); prepare for contested hearing regarding motion to approve disclosure statement (2.8).	5.20	\$4,810.00
01/14/25	JCH	Revise reply to Committee's disclosure statement objection to add table of contents and table of authorities (.5); conform exhibit to reply for filing (.2); finalize (.4) and file (.1) reply.	1.20	\$360.00
01/14/25	MCM	Continue working on reply to Committee objection to amended disclosure statement (1.0); conference call with Foley team regarding same (.6); finalize and file reply to objection and prepare for hearing (1.2).	2.80	\$2,310.00
01/14/25	MDL	Strategize regarding reply in support of disclosure statement.	1.20	\$960.00
01/14/25	MDL	Revise reply brief in support of disclosure statement.	1.70	\$1,360.00
01/14/25	SJM	Revise reply in support of disclosure statement based on comments from M. Lee.	0.20	\$150.00
01/14/25	SJM	Email to M. Lee about strategy regarding certain disclosure statement issues.	0.20	\$150.00
01/14/25	SJM	Revise draft reply in support of disclosure statement to reconcile discussion of certain mechanics (.6); review draft to identify remaining matters to be addressed and for consistency (1.2); further work on drafting specific arguments for reply; (1.4); assist with finalizing reply (.7) .	3.90	\$2,925.00
01/15/25	AMUE	Prepare for oral argument regarding Committee objection to hearing on disclosure statement.	3.60	\$3,330.00

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01/15/25	JCH	Prepare .zip file with pleadings related to disclosure statement and motion for global mediation and circulate same to Foley team.	0.50	\$150.00
01/15/25	MCM	Prepare for hearing on approval of disclosure statement and related matters.	3.40	\$2,805.00
01/15/25	MDL	Strategize for hearing on amended disclosure statement.	1.90	\$1,520.00
01/15/25	MDL	Prepare argument for hearing on amended disclosure statement.	1.50	\$1,200.00
01/15/25	MDL	Evaluate Committee bad faith argument and possible rebuttals to same.	0.30	\$240.00
01/15/25	MDL	Analyze Committee objection to amended disclosure statement.	0.40	\$320.00
01/15/25	SJM	Analyze Committee arguments regarding valuation of claims.	0.80	\$600.00
01/15/25	SJM	Assist with preparation for hearing on disclosure statement.	1.80	\$1,350.00
01/16/25	MDL	Prepare for hearing on amended disclosure statement.	2.10	\$1,680.00
01/17/25	MCM	Analyze necessary revisions to disclosure statement following hearing on same (.7); analyze issues in connection with liquidation analysis (.5).	1.20	\$990.00
01/20/25	MCM	Post-hearing analysis of amendments and amplifications to disclosure statement.	1.00	\$825.00
01/21/25	MDL	Prepare for continued disclosure statement hearing.	0.20	\$160.00
01/21/25	MDL	Strategize with Foley team for continued disclosure statement hearing.	1.30	\$1,040.00
01/21/25	MDL	Post-hearing discussion with Foley team regarding immediate next steps for disclosure statement amendments and meet and confer sessions with Committee counsel (only participated in part of discussion).	0.50	\$400.00
01/21/25	MDL	Telephone conference with counsel for insurers regarding Committee contentions on insurance assignment.	0.30	\$240.00
01/22/25	MRM	Strategize regarding liquidation analysis.	1.00	\$570.00

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01/22/25	SJM	Meeting (for part) with A. Uetz, T. Dolcourt and Hilco regarding property valuation for liquidation analysis.	0.40	\$300.00
01/22/25	TND	Call with Hilco team on valuation for updated liquidation analysis.	1.00	\$735.00
01/23/25	AMUE	Analyze arguments regarding liquidation analysis.	1.40	\$1,295.00
01/23/25	EPM	Conference call with E. Ridley, M. Lee, and M. Moore regarding amendments to disclosure statement.	0.80	\$600.00
01/23/25	MCM	Attention to second amended disclosure statement following Court rulings on same and internal discussion.	0.70	\$577.50
01/23/25	MDL	Evaluate real estate analysis and potential additions to disclosure statement regarding same.	0.20	\$160.00
01/23/25	MDL	Strategize with A. Uetz regarding disclosure statement amendments.	0.70	\$560.00
01/24/25	AMUE	Outline liquidation analysis considerations in light of Judge Lafferty's ruling.	1.20	\$1,110.00
01/24/25	AMUE	Prepare for (.6) and meet with J. Azuse and A. Zimmerman regarding real estate valuation (.5) and debrief regarding meeting (.6).	1.70	\$1,572.50
01/24/25	MDL	Strategize with A. Uetz regarding disclosure statement amendments.	0.20	\$160.00
01/24/25	MDL	Telephone conference with Hilco regarding property valuation issue.	0.70	\$560.00
01/24/25	SJM	Further call with A. Uetz and Hilco regarding real property valuation (partial) (.3); follow-up call with A. Uetz and M. Lee (.2).	0.50	\$375.00
01/25/25	MRM	Research in connection with liquidation analysis in other diocesan matters.	1.80	\$1,026.00
01/26/25	MCM	Analysis of liquidation analyses in other diocesan bankruptcy cases in preparation for further amendments to disclosure statement.	1.20	\$990.00
01/27/25	MCM	Analyze latest list of disclosure statement objections from Committee counsel (.9); begin draft response to same prior to meet and confer (1.3).	2.20	\$1,815.00

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01/28/25	MCM	Conference call with M. Lee and S. Moses regarding Committee's latest objections to disclosure statement and potential resolutions for same (1.0); participate in meet-and-confer with Committee regarding same (2.0); review memo from S. Moses regarding notes from discussion (.4).	3.40	\$2,805.00
01/28/25	MDL	Telephone conference with M. Moore to review Committee list of issues with disclosure statement (1.0); follow up on same (.7).	1.70	\$1,360.00
01/28/25	MDL	Follow-up telephone conference with M. Moore and S. Moses regarding Committee positions on various plan and disclosure statement issues.	0.20	\$160.00
01/28/25	MDL	Telephone conference with Lowenstein and Burns Bair regarding Committee list of issues with disclosure statement.	1.70	\$1,360.00
01/28/25	MRM	Analyze case law in connection with liquidation analysis.	3.10	\$1,767.00
01/28/25	SJM	Review open issues on disclosure statement objections in preparation for Committee call (.6); participate in call with Committee on open issues (1.7); debrief call with M. Moore and M. Lee regarding Committee call and next steps (.2).	2.50	\$1,875.00
01/29/25	MDL	Strategize for 1/30 disclosure statement hearing with M. Moore.	0.50	\$400.00
01/29/25	SJM	Analyze issues regarding Committee objection to disclosure statement based on insurance assignment, including relevant case law (2.1); confer with E. Ridley regarding same (.3).	2.40	\$1,800.00
01/30/25	AMUE	Attend meeting with Hilco, VeraCruz and M. Lee regarding real estate valuation (partial).	3.00	\$2,775.00
01/30/25	EPM	Attend disclosure statement hearing (partial) (.5); conference call with S. Moses regarding privileged insurance coverage legal research (.5).	1.00	\$750.00
01/30/25	JCH	Calendar multiple deadlines related to disclosure statement and continued hearing on same.	0.50	\$150.00
01/30/25	MDL	Strategize with M. Moore regarding further edits to disclosure statement following hearing on same.	0.20	\$160.00

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01/30/25	MDL	Attend meeting with Hilco regarding property valuations for second liquidation analysis (3.3); follow up on issues arising from meeting (3.0).	6.30	\$5,040.00
01/30/25	MRM	Draft analysis in connection with liquidation analysis for internal circulation.	3.10	\$1,767.00
01/30/25	SJM	Attend continued hearing on disclosure statement (1.5); prepare for same (.4).	1.90	\$1,425.00
01/30/25	SJM	Call with E. Mazzocco regarding insurance issues related to Committee objection to disclosure statement.	0.50	\$375.00
01/30/25	SJM	Draft analysis of arguments regarding Committee objection to disclosure statement based on bad faith issues (1.8); review transcripts regarding Committee arguments on delayed discharge (.6).	2.40	\$1,800.00
01/30/25	TND	Meeting with Hilco team, VeraCruz and M. Lee on real estate valuation project (remote participation) (3.3); follow up on action items from call (.1).	3.40	\$2,499.00
01/31/25	MCM	Analyze issues in connection with necessary amendments to disclosure statement based on timeline approved by the Court at the continued hearing (1.3); email and telephone correspondence with N. McGuffey and M. Rofaail regarding additional research (.6); revise second amended disclosure statement (1.0).	2.90	\$2,392.50
01/31/25	MRL	Email correspondence with the Foley team regarding research on the disclosure statement (.4); confer with M. Moore and N. McGuffey regarding research for the disclosure statement (.4).	0.80	\$456.00
01/31/25	NMCG	Meeting with M. Moore and M. Rofaail to discuss research for disclosure statement.	0.50	\$285.00
01/31/25	SJM	Attention to finalizing and filing and service of notices.	0.40	\$300.00
01/31/25	TND	Email correspondence with K. Farrar regarding documents needed for Hilco valuation.	0.20	\$147.00
Task Total:			181.30	\$139,956.50

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016 General Case Strategy (includes team calls)

01/05/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.50	\$285.00
01/07/25	MDL	Strategize with A. Uetz regarding mediation motion and hearing on Committee motions.	0.50	\$400.00
01/09/25	AMUE	Outline strategy regarding approval of disclosure statement in light of Committee's position (1.1) and discuss same with M. Lee (.8).	1.90	\$1,757.50
01/09/25	JCH	Review Rochester adversary docket, pull pleadings related to trial on CNA's administrative expense claim and email same to T. Dolcourt.	1.20	\$360.00
01/09/25	MCM	Debrief with Foley team following hearings on Committee matters and next steps in connection with same.	0.80	\$660.00
01/09/25	MDL	Strategize with A. Uetz regarding Committee motions, disclosure statement, and their impact on mediation strategy.	0.70	\$560.00
01/09/25	SJM	Brief call with M. Lee regarding various case administration matters.	0.20	\$150.00
01/10/25	AMUE	Strategy meeting with Foley team regarding mediation and disclosure statement matters.	1.00	\$925.00
01/10/25	MCM	Conference call with Foley team regarding case strategy and next steps (partial).	1.00	\$825.00
01/10/25	MDL	Strategize with Foley team regarding possible Rule 2019 issue, reply in support of disclosure statement, and pending Committee motions (1.2); follow up on same (.2).	1.40	\$1,120.00
01/10/25	SJM	Brief review of privilege research issue in preparation for team call (.2); call with A. Uetz, M. Lee, M. Moore (for part), and T. Dolcourt (for part) regarding current case status and issues (1.2).	1.40	\$1,050.00
01/10/25	TND	Call with Foley team on response to various motions filed by Committee and potential additional pleadings (1.0 - partial); review order entered by Court on shortened notice (.1).	1.10	\$808.50
01/13/25	MRL	Review pending dioceses cases to provide an update on their status to client.	1.10	\$627.00

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01/15/25	EPK	Coordination and development of strategy with the Foley restructuring and litigation teams relating to factual information requested by Judge Lafferty regarding the posture of state court actions coordinated in the JCCP 5108.	0.90	\$720.00
01/15/25	JRDO	Strategize with attorney team on researching Alameda County Superior Court Complex Department.	0.20	\$99.00
01/16/25	EPK	Confer with G. Goodman regarding OPF standing motion arguments (.1); review Foley team emails regarding lift-stay defense issues (.1).	0.20	\$160.00
01/16/25	SJM	Assist with preparation for hearing on disclosure statement and motions.	1.20	\$900.00
01/20/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.50	\$285.00
01/21/25	SJM	Meeting with A. Uetz and M. Moore in preparation for continued disclosure statement hearing (1.4); debrief call with A. Uetz and M. Moore (for part) regarding hearing and issues related to state court actions (.4).	1.80	\$1,350.00
01/22/25	EPK	Confer with A. Uetz and S. Moses regarding statements to be made on the record at today's JCCP 5108 case management conference (.4); post-hearing discussion with A. Uetz regarding conference takeaways (.2).	0.60	\$480.00
01/22/25	SJM	Draft email to case team regarding Judge Lafferty comments on disclosure statement continued hearing.	0.50	\$375.00
01/26/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.70	\$399.00
01/28/25	EPK	Confer with the Foley restructuring working group regarding automatic stay issues and proposed motion to further extend the removal deadline.	0.30	\$240.00
01/28/25	MDL	Evaluate documents to be shared with Hilco regarding properties owned by RCBO.	0.60	\$480.00
01/28/25	MDL	Email exchange with Hilco representatives regarding 1/30 meeting and property valuation issues.	0.40	\$320.00

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01/28/25	SJM	Email to A. Uetz regarding case transcripts.	0.20	\$150.00
01/29/25	MDL	Evaluate documents to be shared with Hilco regarding Debtor's real estate assets.	0.80	\$640.00
01/30/25	MDL	Strategize with A. Uetz regarding property valuation issues and stipulations proposed by Committee.	0.50	\$400.00
Task Total:			22.20	\$16,526.00

017 Hearings and Court Matters

01/07/25	AMUE	Prepare for hearing on Committee's motions for relief regarding derivative standing and lift stay.	3.20	\$2,960.00
01/07/25	MCM	Prepare for hearing on Committee motions to lift the stay and for derivative standing.	7.00	\$5,775.00
01/07/25	SJM	Meet with G. Goodman and M. Moore regarding preparation for hearing on Committee motions (1.2); prepare for hearing on Committee standing motion regarding insurance litigation (1.7); further discussion with G. Goodman and M. Moore regarding hearing strategy (.9).	3.80	\$2,850.00
01/08/25	AMUE	Appearance at hearing on Committee's pending motions (to lift stay/for derivative standing).	3.40	\$3,145.00
01/08/25	EPK	Attend the lengthy hearings on the Committee's lift-stay and derivative-standing motions (remote).	3.20	\$2,560.00
01/08/25	EPM	Attend hearing on Committee's motions to lift automatic stay and for derivative standing to pursue insurance coverage action (partial).	1.00	\$750.00
01/08/25	GSG	Telephone conference with insurance counsel regarding hearing (.5); prepare for hearing (3.6); participate in same (3.0); meet with counsel after same (.3); review final edits to property of the estate stipulation (.2); correspondence with Committee regarding same (.1).	7.70	\$7,700.00
01/08/25	MCM	Prepare for hearing on Committee motions to lift the stay and for derivative standing (3.5); participate in contested hearing regarding same (3.0); debrief with Foley team following conclusion of hearing (.8).	7.30	\$6,022.50

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01/08/25	SJM	Attend hearing on Committee motions for standing and to lift stay.	3.40	\$2,550.00
01/15/25	AMUE	Prepare for hearing on Committee's three contested motions (two for derivative standing and one to lift stay).	2.60	\$2,405.00
01/15/25	EPK	Listen via Zoom to the Court's oral ruling on the Committee's standing motion.	0.70	\$560.00
01/15/25	EPM	Attend hearing on Committee's motions for derivative standing and to lift the automatic stay.	0.70	\$525.00
01/15/25	ERR	Attend hearing regarding bankruptcy court's ruling on Committee's motion regarding derivative standing and substitution of counsel in insurance case (partial).	0.50	\$487.50
01/15/25	MDL	Attend decision conference on Committee's motion for derivative standing to take over insurance adversary proceeding.	0.70	\$560.00
01/16/25	AMUE	Prepare for (1.4) and appearance at hearing on motion to approve disclosure statement, motion seeking global mediation and three motions filed by Committee (partial) (3.5); debrief with Foley team regarding hearing (1.0).	5.90	\$5,457.50
01/16/25	EPK	Listen to Judge Lafferty's oral ruling on the insurance standing motion and in-court discussions regarding other pending motions and administrative matters (partial).	1.10	\$880.00
01/16/25	EPM	Attend hearing on disclosure statement and Committee's motions for derivative standing and to lift the automatic stay (partial).	1.30	\$975.00
01/16/25	ERR	Prepare for (4.0) and attend (5.0) hearing in SF Superior Court regarding motion to stay insurance action and hearing before bankruptcy court (Oakland) regarding various motions including approval of plan and disclosure statement (including insurance issues).	9.00	\$8,775.00
01/16/25	GSG	Telephone conference with Norton Rose regarding motions to dismiss adversaries (.6); prepare for hearing (1.9); participate in hearing (partial) (3.4); meet with team after hearing (.3) (partial); correspondence with D. Flanagan regarding hearing issues (.2).	6.40	\$6,400.00

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01/16/25	MCM	Prepare for (.5) and participate in (5.0) hearing on approval of disclosure statement and related matters.	5.50	\$4,537.50
01/16/25	MDL	Appear for Debtor at hearing on amended disclosure statement.	5.00	\$4,000.00
01/16/25	SJM	Attend continued hearing on disclosure statement and Committee motions (partial).	3.50	\$2,625.00
01/21/25	AMUE	Prepare for (1.3) and attend (1.5) hearing on disclosure statement, mediation motion, stay motion and OPF motion.	2.80	\$2,590.00
01/21/25	ERR	Attend continued hearing regarding plan and disclosure statement and related motions.	1.50	\$1,462.50
01/21/25	MCM	Prepare for continued hearing on disclosure statement and related matters with Foley team (1.5); participate in hearing and oral rulings on Committee motions (1.5).	3.00	\$2,475.00
01/21/25	MDL	Appear for Debtor at continued disclosure statement hearing.	1.50	\$1,200.00
01/21/25	SJM	Attend continued disclosure statement hearing (1.5); follow up on same (.4).	1.90	\$1,425.00
01/22/25	SJM	Attend hearing on continuance of Committee objection to OPF claim.	0.40	\$300.00
01/30/25	AMUE	Prepare for (.9) and appearance at hearing on motion to approve disclosure statement (1.5); debrief with Foley team (.5).	2.90	\$2,682.50
01/30/25	EPK	Listen to continued hearing on approval of RCBO's disclosure statement, insurance buy-back issues, and procedural scheduling issues.	1.40	\$1,120.00
01/30/25	ERR	Prepare for (2.0) and attend (1.5) hearing on pending issues regarding disclosure of plan.	3.50	\$3,412.50
01/30/25	MCM	Prepare for continued hearing on disclosure statement approval (1.5); participate in same on behalf of Debtor (1.5); debrief with Foley team following conclusion of hearing to discuss next steps (.4).	3.40	\$2,805.00
Task Total:			105.20	\$91,972.50

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018 Non-Bankruptcy Litigation

01/11/25	SJM	Review email and proposed stipulation from state court plaintiff's counsel (.2); email to E. Khatchatourian regarding approach to same (.2).	0.40	\$300.00
01/12/25	EPK	Review emails provided by J. Blease regarding proposed stipulation to add-on Alameda County action to the JCCP 5108.	0.20	\$160.00
01/13/25	EPK	Review proposed stipulation to add a new action naming the Diocese of Oakland to the JCCP 5108 (.1); review Judge Wise's July 24, 2024 order approving stipulated add-on of cases (.1).	0.20	\$160.00
01/14/25	EPK	Email correspondence with defendants' liaison counsel D. Zamora regarding status of lift-stay efforts and setting of Alameda case for trial (.1); address issues relating to adding on of a case to the JCCP 5108 proceeding (.3).	0.40	\$320.00
01/15/25	AROU	Analysis of current status of JCCP 5108.	1.20	\$960.00
01/15/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding draft CMC statement and related automatic stay issues to be raised at next week's case management conference in the JCCP 5108 (.5); review revised draft of the JCCP 5108 joint CMC statement for next week's case management conference (.1); analyze stay implications relating to trial-setting efforts in the JCCP 5108 (.2); email correspondence with the Foley restructuring working group regarding state court JCCP 5108 add-on issues (.1).	0.90	\$720.00
01/15/25	JSH	Communications with state court counsel regarding JCCP 5108 developments.	0.20	\$140.00
01/17/25	EPK	Conference call with defendants' liaison counsel D. Zamora of Weintraub Tobin to discuss next week's case management conference in the JCCP 5108 and related stay issues.	0.90	\$720.00
01/17/25	JSH	Call with E. Khatchatourian and state court counsel regarding JCCP 5108 and status conference.	0.80	\$560.00
01/17/25	TFCA	Draft email regarding trial readiness for abuse litigation matter.	0.30	\$397.50

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01/19/25	JSH	Revise minutes of call with state court counsel D. Zamora regarding JCCP 5108 (.3); communications with E. Khatchatourian regarding the same (.1).	0.40	\$280.00
01/21/25	EPK	Coordination emails with D. Zamora of Weintraub Tobin regarding Judge Lafferty's denial of the Committee's motion to lift the automatic stay (.2); review as-filed joint case management statement in JCCP 5108 (.1).	0.30	\$240.00
01/21/25	EPK	Coordinate with M. Lee and M. Moore regarding tomorrow's JCCP 5108 case management conference and potential statements to be made on the record (.3); email correspondence with S. Moses regarding same (.2); teleconference with S. Moses to develop strategy for JCCP 5108 conference and case administration issues (.5); confer with A. Uetz regarding same (.3).	1.30	\$1,040.00
01/21/25	SJM	Analyze case management statement filed in JCCP state court proceedings (.6); call with E. Khatchatourian regarding same (.3); attention to court report for case management conference (.2).	1.10	\$825.00
01/22/25	AMUE	Review 5108 case conference outcome.	0.50	\$462.50
01/22/25	EPK	Confer with D. Zamora of Weintraub Tobin to coordinate with respect to this afternoon's JCCP 5108 case management conference and issues to be raised at same (.7); virtually attend the January 2025 JCCP 5108 case management conference before Judge Chatterjee (1.4); follow up on same (.4).	2.50	\$2,000.00
01/22/25	SJM	Attention to pro hac vice application for A. Uetz in JCCP state court matter (.2); attend JCCP 5108 case management conference (1.4); follow-up call with E. Khatchatourian regarding same (.2).	1.80	\$1,350.00
01/22/25	WD	Draft Motion for Admission Pro Hac Vice for A. Uetz, declaration in support and [Proposed] Order for JCCP005108.	1.00	\$395.00

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01/23/25	EPK	Follow up with S. Moses regarding transcript of the January 22, 2025 JCCP 5108 case management conference. (.1); further follow-up with defendants' liaison counsel D. Zamora of Weintraub Tobin regarding yesterday's case management conference in the JCCP 5108 (.1).	0.20	\$160.00
01/23/25	SJM	Follow up on transcript from JCCP 5108 hearing.	0.20	\$150.00
01/24/25	EPK	Email correspondence with A. Ouellette regarding JCCP 5108 case list to be provided to Judge Chatterjee in JCCP 5108.	0.10	\$80.00
01/26/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding the CMC order issued by Judge Chatterjee in JCCP 5108 and defense counsel coordination regarding same.	0.20	\$160.00
01/27/25	EPK	Address bankruptcy issues relating to the CMC order issued by Judge Chatterjee in the JCCP 5108 proceedings (.6); confer with the Foley restructuring team regarding strategy relating to same (.6); conference call with defendants' liaison counsel and other defense counsel regarding trial-scheduling issues and related feedback (1.2); post-call conference with S. Moses to debrief relating to same (.7); review JCCP 5108 CMC transcripts (.3).	3.40	\$2,720.00
01/27/25	SJM	Analyze CMC order from JCCP 5108 in order to evaluate implications for RCBO (.6); attend call with state court defense counsel group, with E. Khatchatourian (1.1); follow-up call with E. Khatchatourian regarding approach to co-defendant cases (.7); draft detailed email to case team regarding analysis of co-defendant case issues (.9).	3.30	\$2,475.00
01/28/25	EPK	Evaluate co-defendant stay issues implicated by developments in the JCCP 5108.	0.20	\$160.00
01/28/25	MCM	Review email report from JCCP 5108 defense call group and analyze bankruptcy implications from same.	0.50	\$412.50
01/28/25	SJM	Email to E. Khatchatourian regarding notice of CMC in JCCP 5108.	0.30	\$225.00

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01/29/25	EPK	Review bankruptcy-related statements and positions set forth in prior JCCP 5108 case management statements (.4); draft issues list and arguments relating to stay protections that will be noted in the next case management statement to be submitted to Judge Chatterjee (1.4).	1.80	\$1,440.00
01/30/25	EPK	Confer with K. Farrar regarding project analyzing master list of JCCP 5108 actions to highlight bankruptcy stay impacts for coordination judge (.2); review list of state court actions supplied by R. Simons (.2); analyze co-defendant stay issues, including analysis of Judge Lafferty's Mariner Health decision (.8).	1.20	\$960.00
01/31/25	EPK	Analyze case law relating to co-defendant and non-debtor stay issues (.3); develop stay-defense strategy relative to developments in the JCCP 5108 (.2).	0.50	\$400.00
Task Total:			26.30	\$20,372.50

020 Retention/Billing/Fee Applications for Debtor Professionals

01/06/25	JCH	Prepare certificates of no objection to Foley and A&M's November 2024 monthly fee statements.	0.50	\$150.00
01/07/25	JCH	File Certificates of No Objection to Foley and A&M's November 2024 monthly fee statements.	0.50	\$150.00
01/07/25	SJM	Review CNOs for November fee statements.	0.20	\$150.00
01/14/25	TND	Begin preparation of Foley December fee statement to ensure compliance with U.S. Trustee guidelines.	0.60	\$441.00
01/16/25	TND	Further preparation of December fee statement to ensure compliance with U.S. Trustee guidelines.	1.80	\$1,323.00
01/21/25	TND	Further preparation of December fee statement to ensure compliance with U.S. Trustee guidelines.	1.10	\$808.50
01/22/25	TND	Further preparation of Foley fee statement for December to ensure U.S. Trustee Guideline compliance.	1.00	\$735.00

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01/27/25	TND	Review A&M December fee statement (.1); correspondence with A&M on same and upcoming Interim Application filing (.1); email to J. Breall on upcoming Interim Application filing (.1).	0.30	\$220.50
01/28/25	TND	Analyze information needed for next interim fee application filing.	0.20	\$147.00
01/29/25	JCH	Prepare draft of Foley Fifth Interim Fee Application (1.0); prepare draft of Foley monthly fee statement for December 2024 (.5).	1.50	\$450.00
01/29/25	TND	Email correspondence with A. Uetz on December fee statement.	0.20	\$147.00
01/30/25	JCH	Finalize (.6) and file (.2) Foley monthly fee statement for December 2024; file A&M monthly fee statement for December 2024 (.2); continue work on Foley Fifth Interim Fee Application (1.5).	2.50	\$750.00
01/30/25	TND	Finalize Foley December fee statement for filing.	0.60	\$441.00
01/31/25	JCH	Finish revisions to Foley Fifth Interim Fee Application to add fees and expenses and related exhibits.	1.80	\$540.00
Task Total:			12.80	\$6,453.00

021 Retention/Fee Applications: Ordinary Course Professionals

01/08/25	TND	Review Kemner November fee statement.	0.20	\$147.00
01/09/25	TND	Prepare draft OCP retention documents for potential new OCP.	0.40	\$294.00
01/16/25	TND	Prepare engagement letter for real estate valuation services OCP retention (.6); draft notice of supplemental OCP retention (.1); email to Committee counsel regarding Kemner November invoice (.1); email to U.S. Trustee regarding Kemner November invoice (.1).	0.90	\$661.50
01/21/25	TND	Further work on retention for real estate valuation firm.	0.40	\$294.00

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01/27/25	TND	Update Hilco retention letter to include A. Uetz edits (.2); email to Hilco team on OCP process (.2).	0.40	\$294.00
01/28/25	TND	Review Kemner monthly fee invoice for December 2024.	0.20	\$147.00
01/29/25	SJM	Prepare notice of OCP compliance for Q4 2024.	0.60	\$450.00
01/29/25	TND	Review Hilco comments to OCP engagement letter and documents (.5); email to Committee counsel regarding Kemner 2024 invoice (.1); email to U.S. Trustee regarding December 2024 invoice for Kemner (.1).	0.70	\$514.50
Task Total:			3.80	\$2,802.00

022 Retention/Fee Applications: Other Professionals

01/03/25	SJM	Email to A. Bardos regarding payment of final installment to DWC (.3); email correspondence with A. Uetz and B. Weisenberg regarding same (.2).	0.50	\$375.00
01/10/25	SJM	Email to client regarding payment of November monthly fee statements and Committee member expense reimbursements (.8); respond to B. Weisenberg regarding payment status (.1).	0.90	\$675.00
01/27/25	TND	Email correspondence with all three mediators on next filing dates for interim fee applications.	0.60	\$441.00
01/30/25	JCH	Prepare chart of interim payments due to case professionals for December 2024 monthly fee statements and email same to S. Moses.	0.50	\$150.00
01/30/25	SJM	Follow up on status of expense reimbursements to Committee members.	0.40	\$300.00
01/30/25	TND	Email correspondence with R. Newsome on interim fee application.	0.10	\$73.50
01/31/25	SJM	Follow up on status of Committee member expense reimbursements.	0.20	\$150.00
Task Total:			3.20	\$2,164.50

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

01/14/25	EPK	Review disbursement information reflected in prior monthly operating reports.	0.10	\$80.00
01/15/25	EPK	Email correspondence with D. Flanagan of VeraCruz regarding preliminary draft of December 2024 MOR package and transmission of supplemental MOR documents to BRG (.3); email correspondence with K. Farrar regarding transmission of supplemental MOR documents to BRG (.2).	0.50	\$400.00
01/20/25	EPK	Review December 2024 MOR package and supporting documents prepared by D. Flanagan of VeraCruz (.6); review quarterly U.S. Trustee fees calculation prepared by D. Flanagan (.1); email correspondence with D. Flanagan regarding comments to the December 2024 MOR package and wage order reporting issues (.5); email correspondence with A. Bardos of RCBO regarding final approval for filing of December 2024 MOR (.1).	1.30	\$1,040.00
01/21/25	EPK	Coordinate with J. Harrison regarding filing and service of December 2024 MOR and wages order report (.2); email correspondence with A. Bardos of RCBO and the VeraCruz team regarding as-filed MOR and supplemental documents for the BRG team (.1).	0.30	\$240.00
01/21/25	JCH	File monthly operating report for December 2024 and circulate filed copy of same to client group.	0.50	\$150.00
01/22/25	EPK	Email correspondence with D. Flanagan of VeraCruz and K. Farrar regarding December MOR supplements to be produced to BRG.	0.20	\$160.00
01/23/25	EPK	Email correspondence with D. Flanagan of VeraCruz regarding calculation and payment of quarterly U.S. Trustee fees.	0.10	\$80.00
01/27/25	EPK	Follow up with S. Moses and VeraCruz team regarding payment of Q4 2024 quarterly U.S. Trustee fees.	0.20	\$160.00
01/28/25	EPK	Follow up on review and reconciliation of Q4 2024 disbursements and payment of related quarterly U.S. Trustee fees.	0.10	\$80.00

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01/30/25	EPK	Review financial information for third CTN Rule 2015.3 report to be filed in February.	0.20	\$160.00
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Task Total:	3.50	\$2,550.00
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026 Unsecured Creditor Issues/Communications/Meetings

01/03/25	AMUE	Communications with B. Weisenberg regarding DWC and provide direction to S. Moses regarding same.	0.50	\$462.50
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01/07/25	MDL	Edit stipulation proposed by Committee on section 541 issues.	0.80	\$640.00
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01/08/25	MDL	Strategize regarding Committee's proposed stipulation on real estate assets.	0.10	\$80.00
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01/09/25	AMUE	Strategize with M. Lee regarding request for Committee's bylaws.	0.40	\$370.00
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01/10/25	AMUE	Review email communication between M. Lee and C. Restel regarding request for bylaws (.3) and communication with M. Lee about next action (.3); follow-up communication to J. Prol regarding same (.2).	0.80	\$740.00
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01/15/25	MDL	Evaluate proposed stipulation sent by Committee on property of the estate issue.	0.20	\$160.00
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01/21/25	SJM	Follow up with counsel for Committee regarding scheduling for OPF claim objection.	0.20	\$150.00
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01/21/25	SJM	Review stipulation regarding schedule for hearing on Committee objection to OPF claim (.2); email correspondence with case team, Committee, and OPF counsel regarding proposed schedule for hearing and reply (.3).	0.50	\$375.00
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01/22/25	AMUE	Call with B. Weisenberg (.3) and call with C. Restel (.3) regarding request for information.	0.60	\$555.00
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01/22/25	MDL	Revise Committee-proposed stipulation on property of the estate.	0.20	\$160.00
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01/23/25	SJM	Review proposed orders on Committee motions for relief from stay and standing (.7); review record from hearing in order to confirm ruling regarding clarification of stay (.6).	1.30	\$975.00
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01/24/25	AMUE	Prepare for (.8) and attend meeting with J. Prol and B. Weisenberg regarding open disclosure statement issues (.8); debrief with M. Lee (.4).	2.00	\$1,850.00
01/24/25	MCM	Confer with Committee regarding outstanding orders denying Committee motions and plan/disclosure statement issues.	1.00	\$825.00
01/24/25	MDL	Telephone conference with Lowenstein (J. Prol, B. Weisenberg) regarding mediation issues and negotiation of disclosure statement.	0.80	\$640.00
01/25/25	MCM	Email correspondence with Committee counsel transmitting word versions of prior filings.	0.30	\$247.50
01/27/25	MDL	Strategize regarding stipulation proposed by Committee regarding property of the estate.	0.10	\$80.00
01/28/25	GSG	Correspondence with Committee regarding MTD issues (.1); correspondence with team on scheduling related to same (.2).	0.30	\$300.00
01/28/25	SJM	Email to B. Weisenberg regarding revised orders on Committee motions.	0.30	\$225.00
01/29/25	GSG	Correspondence with B. Weisenberg regarding MTD schedule and property of the estate call.	0.20	\$200.00
01/30/25	AMUE	Meeting with Lowenstein team regarding disclosure statement and mediation.	0.50	\$462.50
01/30/25	MCM	Conference call with Committee regarding disclosure statement hearing and related issues.	0.50	\$412.50
01/30/25	SJM	Email to A. Uetz regarding orders on Committee motions (.1); call with B. Weisenberg regarding same (.1); finalize orders on standing motions (.3).	0.50	\$375.00
01/31/25	AMUE	Prepare for (.8) and participate in (.4) meeting with B. Weisenberg regarding property of the estate issue.	1.20	\$1,110.00
01/31/25	GSG	Telephone conference with Committee counsel regarding property of the estate Stipulation (.4); prepare for same (.4).	0.80	\$800.00
01/31/25	MDL	Telephone conference with Lowenstein (C. Restel, B. Weisenberg) regarding property of the estate stipulation proposed by Committee.	0.40	\$320.00

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01/31/25	MDL	Further discussion with G. Goodman and A. Uetz regarding property of the estate stipulation proposed by Committee and other potential stipulations.	0.50	\$400.00
01/31/25	MDL	Strategize with G. Goodman and A. Uetz regarding property of the estate stipulation proposed by Committee.	0.20	\$160.00
Task Total:			15.20	\$13,075.00

027 Real Estate and Real Property Issues

01/22/25	AMUE	Meeting with Hilco regarding valuation (1.0); prepare for same (1.0).	2.00	\$1,850.00
01/22/25	AMUE	Analyze property information to support valuation analysis.	1.10	\$1,017.50
01/23/25	SJM	Follow up with A. Uetz regarding real property reports.	0.40	\$300.00
01/24/25	AMUE	Finalize NDA for real estate professionals (.8) and communication with client leadership regarding same (.3).	1.10	\$1,017.50
01/28/25	AMUE	Work on real estate valuation issue.	0.50	\$462.50
Task Total:			5.10	\$4,647.50

028 Tort Claims

01/17/25	KAFA	Prepare John Doe 1022 discovery, document productions, depositions, etc. as requested by OMM.	1.00	\$395.00
01/28/25	KAFA	Communications with R. Medeiros regarding DRB materials in preparation for upcoming RCBO audit (.2); analysis of John Doe 1014 case due to receipt of notice of hearing (.3).	0.50	\$197.50
Task Total:			1.50	\$592.50

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029 Non-tort Proofs of Claim

01/02/25	KAFA	Analysis of emails and documents on server for non-abuse litigation claims requested by M. Lee.	0.20	\$79.00
01/24/25	JCH	Finalize (.4) and file (.1) Debtor's Response to Committee's Objection to Scheduled Claim of Oakland Parochial Fund and Declaration in support.	0.50	\$150.00
01/28/25	SJM	Respond to A. Uetz regarding OPF response to claim objection.	0.20	\$150.00
01/29/25	SJM	Analyze issue regarding stipulation proposed by Committee on OPF claim (.6); email to team regarding same (.2).	0.80	\$600.00
Task Total:			1.70	\$979.00

031 Insurance Issues (coverage, includes adversary proceeding)

01/02/25	EPM	Revise written discovery responses to insurers.	1.10	\$825.00
01/02/25	MDL	Evaluate draft written discovery responses.	0.40	\$320.00
01/02/25	MR	Confer with E. Mazzocco and M. Lee regarding written discovery in insurance adversary proceeding.	0.60	\$414.00
01/03/25	EPM	Draft outline of arguments for reply in support of motion to hold cases in abeyance.	0.80	\$600.00
01/03/25	MR	Review Committee's opposition to Motion to Hold Case in Abeyance, in insurance adversary proceeding.	0.40	\$276.00
01/05/25	EPM	Review Committee's opposition to motion to hold cases in abeyance (.7); draft reply in support of motion to hold cases in abeyance (1.7); revise written discovery responses (.2).	2.60	\$1,950.00
01/06/25	EPM	Draft outline of arguments for reply in support of motion to hold cases in abeyance (2.6); draft reply in support of motion to hold cases in abeyance (.6); revise written discovery responses (1.2).	4.40	\$3,300.00
01/06/25	MCM	Analysis of potential bad faith claims and related issues.	0.80	\$660.00

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01/06/25	MDL	Confer with Foley team regarding Committee's bad faith claim argument.	0.80	\$640.00
01/06/25	MR	Strategize for key arguments in reply brief in support of motion to hold case in abeyance, in insurance adversary proceeding (.4); review and revise draft of written discovery responses in insurance adversary proceeding (.7); analyze case law cited in Committee's opposition to motion to hold case in abeyance (.7).	1.80	\$1,242.00
01/07/25	EPM	Continue drafting reply in support of motion to hold cases in abeyance.	3.50	\$2,625.00
01/07/25	MR	Complete analysis and summary of case law authority cited in Committee opposition to motion to hold case in abeyance, in insurance coverage action (.8); draft sections of reply brief for same (1.2).	2.00	\$1,380.00
01/08/25	AMUE	Email communication with counsel for insurers regarding mediation motion.	0.30	\$277.50
01/08/25	EPM	Continue drafting reply in support of motion to hold cases in abeyance.	7.80	\$5,850.00
01/08/25	ERR	Review reply brief regarding motion for stay.	0.80	\$780.00
01/08/25	MR	Draft sections of reply brief in support of motion to hold case in abeyance, in insurance coverage litigation.	2.70	\$1,863.00
01/09/25	AMUE	Strategize regarding reply brief in support of motion to hold case in abeyance in light of Committee's actions in the bankruptcy court.	1.10	\$1,017.50
01/09/25	EPM	Conduct privileged legal research regarding insurance coverage subjects (1.3); revise reply in support of motion to hold cases in abeyance (1.5).	2.80	\$2,100.00
01/09/25	SJM	Begin work on revisions to reply in support of motion to hold coverage litigation in abeyance.	0.90	\$675.00
01/10/25	AMUE	Revisions to reply brief in support of motion to hold case in abeyance (1.7); multiple follow-up communications with E. Mazzocco to finalize brief for filing (1.2).	2.90	\$2,682.50

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01/10/25	EPM	Revise and finalize reply in support of motion to hold cases in abeyance (5.3); conduct privileged legal research regarding insurance coverage subjects (.9); draft privileged legal research memorandum regarding insurance coverage subjects (.8).	7.00	\$5,250.00
01/10/25	ERR	Review bankruptcy filings regarding insurance issues.	1.40	\$1,365.00
01/10/25	JCH	Finalize (.6) and file (.2) Debtor's Reply Brief in Support of Motion to Hold Cases in Abeyance.	0.80	\$240.00
01/10/25	MCM	Revise reply to objection to motion to hold coverage action in abeyance.	0.80	\$660.00
01/10/25	MDL	Revise introductory section of reply brief in support of motion to hold adversary proceeding in abeyance.	0.20	\$160.00
01/10/25	MR	Draft revision to and perform final proofread of reply brief in support of motion to hold case in abeyance, in insurance coverage action (1.3); analyze and summarize additional case law in support of key arguments in same (2.5).	3.80	\$2,622.00
01/10/25	SJM	Work on revisions regarding bankruptcy case and process for reply in support of motion to hold coverage action in abeyance (1.8); assist with finalizing reply (1.4).	3.20	\$2,400.00
01/10/25	SJM	Brief research regarding Ninth Circuit law for reply in support of motion to hold coverage action in abeyance.	0.30	\$225.00
01/10/25	TND	Provide information on fees for reply brief on abeyance motion (.7); research for reply brief (.7).	1.40	\$1,029.00
01/13/25	AMUE	Draft revisions to reply brief in support of motion to hold case in abeyance.	1.10	\$1,017.50
01/13/25	EPM	Revise written discovery responses (1.3); draft legal research memorandum regarding privileged insurance coverage subjects (1.2); review recent filings (.5).	3.00	\$2,250.00
01/13/25	JCH	Calendar extended deadlines in adversary cases.	0.50	\$150.00

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01/13/25	MR	Email communications with E. Mazzocco and K. Farrar regarding strategy for identifying potential sets of documents for production in insurance coverage action.	0.30	\$207.00
01/14/25	AMUE	Review request from Westport regarding number of proofs of claim (.2) and provide advice to team regarding same (.3); review draft discovery responses (.8).	1.30	\$1,202.50
01/14/25	EPM	Continue drafting legal research memorandum regarding privileged insurance coverage subjects (5.1); revise and finalize written discovery responses (1.1); review and summarize recent filings related to motion to hold cases in abeyance (1.0).	7.20	\$5,400.00
01/14/25	ERR	Review CNA reply brief regarding motion to stay and review authority in preparation for hearing.	1.40	\$1,365.00
01/14/25	JCH	Prepare .zip file of pleadings related to January 16 hearing in insurance adversary litigation case and circulate same to Foley group.	0.50	\$150.00
01/14/25	KAFA	Analysis of response to certain insurers' requests for production of documents (.8); analysis of documents previously produced to insurers and summarize same in preparation for response to certain insurers' RFP's (1.4); confer with M. Roberts regarding same (.5).	2.70	\$1,066.50
01/14/25	MR	Telephone correspondence with K. Farrar regarding identification of documents for production in insurance coverage action (.5); email and telephone communications with E. Mazzocco regarding same (.3).	0.80	\$552.00
01/15/25	AMUE	Prepare for hearing on motion to hold insurance coverage litigation in abeyance.	3.10	\$2,867.50

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01/15/25	EPM	Draft legal research memorandum regarding privileged insurance coverage subjects (4.5); confer with E. Ridley, M. Moore, and M. Lee regarding legal research and strategy in connection with privileged insurance coverage subjects (.8); conduct legal research regarding privileged insurance coverage subjects (3.6); draft summary of key cases in advance of hearing on motion to hold cases in abeyance (1.1); conference call with A. Uetz and E. Ridley regarding hearing on motion to hold cases in abeyance (.5).	10.50	\$7,875.00
01/15/25	ERR	Review materials in preparation for hearing regarding stay in USDC insurance action and various motions regarding insurance before bankruptcy court.	3.00	\$2,925.00
01/16/25	AMUE	Prepare for (1.2) and attend (1.5) hearing on motion to hold case in abeyance; debrief with M. Kemner following hearing (.8).	3.50	\$3,237.50
01/16/25	EPM	Summarize key cases in advance of hearing on motion to hold cases in abeyance (.4); attend hearing (.5).	0.90	\$675.00
01/16/25	MCM	Participate in hearing on motion to hold insurance coverage litigation in abeyance.	1.30	\$1,072.50
01/16/25	MR	Communicate with J. Breall regarding document productions in insurance coverage action.	0.10	\$69.00
01/16/25	TND	Research case law in preparation for hearing on motion for abeyance of insurance action.	0.90	\$661.50
01/17/25	AMUE	Provide advice regarding insurer request for information regarding proofs of claim (1.1); provide advice regarding insurer request for discovery documents (.9).	2.00	\$1,850.00
01/17/25	EPM	Email correspondence with case team regarding case management subjects in the insurance coverage case.	0.50	\$375.00
01/17/25	ERR	Telephone call with B. Weinstein regarding pending coverage issues.	0.70	\$682.50
01/21/25	AMUE	Analyze insurer discovery responses.	1.50	\$1,387.50
01/21/25	AMUE	Meeting with insurers regarding assignment.	0.80	\$740.00

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01/21/25	EPM	Review documents for responsiveness to document requests and compliance with governing protective order (1.9); review documents and communications reflecting discovery status in insurance coverage case (3.0); draft summary of discovery status in insurance coverage case (3.9); revise responses to written discovery (1.5).	10.30	\$7,725.00
01/21/25	ERR	Review statement regarding issues related to insurance in plan and disclosure statement.	0.30	\$292.50
01/21/25	MR	Email and telephone communications with E. Mazzocco regarding identification of outstanding discovery items subject to district court's order in insurance coverage action.	0.70	\$483.00
01/21/25	SJM	Call with E. Mazzocco regarding insurer discovery issues.	0.50	\$375.00
01/22/25	AMUE	Email with M. Plevin regarding disclosure statement issue.	0.40	\$370.00
01/22/25	EPM	Continue drafting summary of discovery status in insurance coverage case (.8); conference call with M. Roberts regarding written discovery responses (.2); finalize and serve written discovery responses (.5).	1.50	\$1,125.00
01/22/25	KAFA	Analysis of documents previously produced to insurers.	0.70	\$276.50
01/22/25	MDL	Strategize with M. Roberts regarding document produced to the different constituencies in the bankruptcy and in the adversary proceeding.	0.60	\$480.00
01/22/25	MR	Revise draft of objections and responses to Certain Insurers' Requests for Production in insurance coverage action (1.7); draft sections of internal memorandum summarizing outstanding discovery items subject to district court's order (2.7).	4.40	\$3,036.00
01/22/25	SJM	Draft email to insurer counsel regarding Judge Lafferty comments on disclosure statement continued hearing.	0.40	\$300.00
01/23/25	AMUE	Communication with M. Plevin regarding insurance assignment.	0.50	\$462.50

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01/23/25	AMUE	Analyze insurance assignment/bad faith issue as it relates to disclosure statement approval.	1.20	\$1,110.00
01/23/25	AMUE	Analyze insurer request for information regarding number of claims reflected in disclosure statement.	1.10	\$1,017.50
01/23/25	EPM	Revise memorandum summarizing discovery status (6.2); conference call with S. Moses regarding discovery status and legal research issues (.9); correspondence with insurance counsel regarding document productions (.4); internal correspondence regarding open insurance coverage legal research issues (.3).	7.80	\$5,850.00
01/23/25	ERR	Review issues regarding claim count and bad faith issues regarding disclosure.	0.60	\$585.00
01/23/25	ERR	Review request for materials by insurers.	0.30	\$292.50
01/23/25	MCM	Conference call with Foley insurance team regarding response to insurer request for claim analysis and bad-faith issues.	1.00	\$825.00
01/23/25	MDL	Revise memorandum on document production in the main case and the adversary proceeding.	0.70	\$560.00
01/23/25	MDL	Telephone conference with E. Mazzocco and M. Roberts regarding memorandum on document production in the main case and the adversary proceeding.	0.50	\$400.00
01/23/25	MR	Continue drafting sections of internal memorandum summarizing outstanding discovery items subject to district court's order, based on review of prior written discovery and document productions.	2.90	\$2,001.00
01/23/25	SJM	Call with E. Mazzocco regarding discovery issues and insurance assignment.	0.90	\$675.00
01/24/25	EPM	Conference call with A. Uetz, E. Ridley, M. Lee, and M. Roberts regarding discovery status (.6); conference call with M. Lee and M. Roberts regarding document review in insurance coverage action (1.0).	1.60	\$1,200.00
01/24/25	ERR	Review case status and issues regarding discovery with insurers.	0.80	\$780.00

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01/24/25	JCH	Finalize (.4) and file (.1) motion to dismiss OPF adversary.	0.50	\$150.00
01/24/25	MDL	Provide instruction to E. Mazzocco and M. Roberts regarding production of historical litigation files.	0.50	\$400.00
01/24/25	MDL	Telephone conference with insurance team regarding discovery issues in main case and insurance adversary proceeding.	0.60	\$480.00
01/24/25	MR	Attend strategy call with A. Uetz, E. Ridley, M. Lee and E. Mazzocco regarding completion of discovery by court-ordered deadline in district court coverage action (.6); confer further with E. Mazzocco and M. Lee regarding same (.4); create action plan for compliance with court order regarding same (.9).	1.90	\$1,311.00
01/27/25	AMUE	Review requests from counsel for Insurers for information and provide advice regarding response.	1.00	\$925.00
01/27/25	EPM	Conference call with M. Roberts and K. Farrar to discuss forthcoming document productions (.5); review insurer requests for production (.5).	1.00	\$750.00
01/27/25	MCM	Analysis of informal discovery requests from insurer counsel regarding claims numbers.	0.40	\$330.00
01/27/25	MR	Review prior productions and production indices to evaluate scope of certain materials previously produced, in furtherance of meeting Judge Corley's March 3, 2025 document production deadline in insurance coverage action (.5); attend strategy call with E. Mazzocco and K. Farrar regarding same. (.5).	1.00	\$690.00
01/27/25	SJM	Assist with analysis of discovery status.	0.40	\$300.00
01/28/25	EPM	Analysis of document requests from various insurers to identify potentially responsive documents (2.0); analysis of operative confidentiality orders governing production of documents (1.1).	3.10	\$2,325.00
01/28/25	MCM	Analyze issues regarding production of unredacted proofs of claim to additional insurer party/EPIQ eDiscovery Solutions, employed by Westport.	0.30	\$247.50

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01/28/25	MR	Perform detailed review of relevant Protective Orders and previously-produced documents to create recommendation for contents of forthcoming productions in insurance coverage action.	1.70	\$1,173.00
01/29/25	EPM	Draft summary and recommendation to A. Uetz and legal team regarding documents to be produced in response to requests for production from insurers.	1.70	\$1,275.00
01/29/25	ERR	Review court memo regarding insurance issues via a vis disclosure.	0.50	\$487.50
01/29/25	MR	Strategy call with E. Mazzocco regarding document productions in insurance coverage action (.4); draft summary of proposed materials for production in insurance coverage action (.3); review documents for production (1.7).	2.40	\$1,656.00
01/30/25	AMUE	Provide advice regarding discovery in order to comply with the Court's order regarding discovery.	1.60	\$1,480.00
01/30/25	EPM	Conference call with K. Farrar and M. Roberts regarding document collection and review (1.5); preparation for conference call (.2).	1.70	\$1,275.00
01/30/25	KAFA	Analysis of prior client document collections/productions/discovery and clergy III collections/litigation/discovery to determine any additional potential documents to produce pursuant to insurers' document requests (1.9); call with M. Roberts and E. Mazzocco to discuss discovery/collection/production history (1.5).	3.40	\$1,343.00
01/30/25	MCM	Conference call with counsel for certain insurers regarding plan amendment to section 5.14 and potential language for inclusion in disclosure statement regarding bad-faith claims.	0.40	\$330.00
01/30/25	MR	Attend strategy call with E. Mazzocco and K. Farrar regarding steps necessary to identify and review documents for potential production to meet court-ordered document production deadline in insurance coverage action (1.5); review documents in follow-up to same (.2).	1.70	\$1,173.00
01/31/25	AMUE	Provide advice regarding insurers' request for certain information.	0.90	\$832.50

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01/31/25	EPM	Conference call with E. Ridley regarding status of document discovery.	0.30	\$225.00
01/31/25	ERR	Review status of discovery and production in insurance case.	0.70	\$682.50
01/31/25	ERR	Review status of hearing regarding insurance issues regarding disclosure statement and plan terms.	0.60	\$585.00
01/31/25	KAFA	Analysis of prior client document collections/productions/discovery and clergy III collections/litigation/discovery to determine any additional potential documents to produce pursuant to insurers' document requests.	4.30	\$1,698.50
01/31/25	MCM	Analysis of information requests from insurers regarding claims (.6); email correspondence with Foley team regarding same (.4).	1.00	\$825.00
Task Total:			178.30	\$134,378.00

032 Rule 2004 Motions/Discovery/Subpoenas

01/09/25	MDL	Email exchange with Lowenstein regarding request for Committee's bylaws.	0.20	\$160.00
01/09/25	MDL	Strategize with Foley team regarding discoverability of Committee bylaws.	0.20	\$160.00
01/10/25	MDL	Strategize with Foley team regarding request for Committee bylaws.	0.20	\$160.00
01/13/25	AMUE	Communications back and forth with Committee counsel, and internal, regarding request for Bylaws.	0.80	\$740.00
01/14/25	KAFA	Prepare documents for production to Committee (.2); review client documents for G. Downing property valuation documents requested by M. Lee (.5).	0.70	\$276.50
01/22/25	JCH	Pull copies of 2004 orders and related hearing transcripts and email same to A. Uetz.	0.50	\$150.00
01/23/25	KAFA	Prepare documents for production to Committee.	0.40	\$158.00

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01/27/25	KAFA	Call with M. Roberts and E. Mazzocco to discuss all Diocese of Oakland productions and discovery (.5); analysis of memo regarding status of insurance-related document discovery (.4); analysis of all prior productions (.8).	1.70	\$671.50
01/29/25	KAFA	Analysis of prior document collections, discovery and productions (.4); call with E. Mazzocco regarding abuse case discovery (.2).	0.60	\$237.00
Task Total:			5.30	\$2,713.00

034 Other Motion Practice

01/08/25	AMUE	Review privileged issue concerning Committee and state court counsel.	1.20	\$1,110.00
01/08/25	TND	Research on privileged matter regarding case disclosures.	0.40	\$294.00
01/09/25	AMUE	Develop strategy regarding privileged issue concerning Committee (1.2); communications with Foley team regarding research needed for same (.8).	2.00	\$1,850.00
01/09/25	TND	Further research on privileged matter related to bankruptcy disclosures (4.2); draft lengthy summary of research to Foley team regarding same (.9).	5.10	\$3,748.50
01/10/25	AMUE	Review privileged research regarding 2019 disclosures.	1.10	\$1,017.50
01/10/25	AMUE	Review privileged issue concerning Committee state court counsel.	1.10	\$1,017.50
01/13/25	AMUE	Analyze issue concerning litigation funding for various state court counsel.	0.90	\$832.50
01/18/25	TND	Research privileged matter regarding state court counsel.	0.50	\$367.50
01/21/25	MDL	Revise draft motion for settlement of Galindo claim.	0.50	\$400.00
01/27/25	SJM	Emails with case team regarding removal deadline and motion to further extend same.	0.40	\$300.00
01/28/25	JSH	Work on fourth motion to extend removal deadline.	0.40	\$280.00

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01/29/25	JSH	Work on fourth motion to extend removal deadline.	1.00	\$700.00
01/30/25	EPK	Coordination with S. Moses and J. Harper regarding fourth request for extension of removal deadline and declaration in support of same.	0.20	\$160.00
01/30/25	JSH	Work on fourth motion to extend removal deadline.	1.80	\$1,260.00
01/30/25	SJM	Review and revise moving papers for further extension of removal deadline.	1.20	\$900.00
01/31/25	EPK	Review Bardos declaration in support of fourth motion to extend removal deadline (.1); follow up on status of filing fourth request prior to expiration of the deadline on February 3, 2025 (.2).	0.30	\$240.00
01/31/25	JSH	Work on fourth motion to extend removal deadline.	0.80	\$560.00
01/31/25	SJM	Revise draft declaration in support of motion to extend time for removal of state court actions (.8); email to A. Bardos regarding same (.3); further revisions to motion (1.1); attention to finalizing motion and related documents (.7).	2.90	\$2,175.00
Task Total:			21.80	\$17,212.50

035 General Counsel Matters

01/02/25	MTKS	Draft A104 (.5), A101 (.5), A101 Exhibit A (.5), and A201 (.4) form construction contract.	1.90	\$902.50
01/06/25	MTKS	Draft and revise A101 and A201 form agreements.	1.10	\$522.50
Task Total:			3.00	\$1,425.00

038 Mediation

01/02/25	EPM	Mediation session regarding revisions to plan terms to reflect agreements reached in mediation.	2.00	\$1,500.00
01/02/25	MCM	Conference call with insurer counsel and mediator regarding amended plan and related issues.	1.00	\$825.00

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01/02/25	MDL	Mediation session with insurance mediators and counsel for insurers.	1.00	\$800.00
01/02/25	MDL	Telephone conference with S. Warren (O'Melveny Myers) regarding confidential mediation issue.	0.20	\$160.00
01/02/25	MDL	Email exchange with insurance mediators and counsel for insurers regarding confidential mediation issue.	0.10	\$80.00
01/06/25	MDL	Analyze modified mediation order for purposes of evaluating further modification of same.	0.10	\$80.00
01/06/25	MDL	Strategize with M. Moore regarding confidential mediation issue.	0.20	\$160.00
01/06/25	SJM	Revise motion for global mediation (3.4); draft declaration of A. Bardos in support of same (.4).	3.80	\$2,850.00
01/06/25	TND	Revise motion and proposed order for global mediation (1.6); confer with S. Moses on same (.2).	1.80	\$1,323.00
01/07/25	AMUE	Finalize motion seeking global mediation (2.1); telephone meeting with T. Gallagher regarding same (.4).	2.50	\$2,312.50
01/07/25	MDL	Strategize with S. Moses regarding motion to compel mediation and motion to shorten time for same.	0.30	\$240.00
01/07/25	MDL	Edit motion to compel mediation and proposed order for same.	0.80	\$640.00
01/07/25	MDL	Email exchange with counsel for insurers regarding confidential mediation subject.	0.20	\$160.00
01/07/25	SJM	Update motion for global mediation based on comments from A. Uetz (.8); call with M. Lee regarding revisions to same, and approach to notice and shortening time (.2); email to A. Bardos regarding declaration in support of mediation motion (.2); further revisions to motion and supporting documents (.6).	1.80	\$1,350.00
01/07/25	TND	Review correspondence on updates to motion for global mediation and related documents.	0.20	\$147.00

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01/08/25	AMUE	Final revisions to motion to compel global mediation for filing (1.5); final revisions to A. Bardos' affidavit for filing (.8); work on motion to shorten time (.8); communications with counsel for Committee regarding motion (.5).	3.60	\$3,330.00
01/08/25	SJM	Finalize mediation motion (.4); prepare application for order shortening time on same (1.1); follow up regarding position of parties on shortening time (.4); final review of revised application to shorten time (.3).	2.20	\$1,650.00
01/08/25	TND	Revisions to motion for global mediation (.3); revise OST application and related documents (.6); communications with Foley team on filing motion and OST application (.3); email to mediators with filed pleadings (.1).	1.30	\$955.50
01/10/25	AMUE	Meeting with Judge Newsome regarding mediation.	0.40	\$370.00
01/10/25	SJM	Email case team regarding entered order shortening time on mediation motion (.1); draft notice of hearing on same (.4); work on service issues to confirm correct service on insurer and mediator parties for same (1.1).	1.60	\$1,200.00
01/13/25	TND	Draft reply in support of motion for global mediation (3.8); call with M. Turner; M. Plevin and A. Uetz on mediation and related matters (.8).	4.60	\$3,381.00
01/14/25	MDL	Analyze documents to be shared with mediators.	0.60	\$480.00
01/14/25	SJM	Brief review of draft reply in support of mediation motion.	0.30	\$225.00
01/14/25	TND	Make revisions to reply brief in support of global mediation.	1.20	\$882.00
01/15/25	AMUE	Finalize declaration of D. Flanagan in support of mediation motion.	2.10	\$1,942.50
01/15/25	AMUE	Prepare for hearing on contested mediation motion (1.2); finalize reply brief (1.0).	2.20	\$2,035.00
01/15/25	JRBL	Communications with A. Uetz regarding trial time estimates for state court cases.	0.50	\$637.50
01/15/25	MCM	Revise reply to objection to motion to compel global mediation (.5); email correspondence regarding same (.3).	0.80	\$660.00

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01/15/25	MDL	Revise reply brief in support of mediation motion.	0.80	\$640.00
01/15/25	MRL	Confer with T. Dolcourt regarding reviewing other diocese cases for mediation orders (.1); analyze other diocese cases for mediation orders for support to the Debtor's reply to mediation order (1.2).	1.30	\$741.00
01/15/25	SJM	Comment on reply in support of mediation motion.	0.40	\$300.00
01/15/25	SJM	Email correspondence with A. Uetz and T. Dolcourt regarding mediation confidentiality issues.	0.40	\$300.00
01/15/25	SJM	Review insurer response in support of mediation motion.	0.30	\$225.00
01/15/25	TND	Multiple revisions to draft reply brief in support of mediation to incorporate additional comments from team members (5.7); research information for exhibits to reply brief (.9); draft D. Flanagan declaration (.5); prepare exhibit to same (.2); calls and emails with D. Flanagan on declaration (.3).	7.60	\$5,586.00
01/16/25	AMUE	Communication with Judge Newsome regarding mediation matters.	0.50	\$462.50
01/21/25	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to client.	0.40	\$228.00
01/22/25	SJM	Email to A. Uetz regarding real property list for mediation.	0.40	\$300.00
01/23/25	MDL	Strategize with Foley team regarding confidential mediation issue.	0.70	\$560.00
01/25/25	AMUE	Prepare for (.5) and attend meeting with Judge Sontchi regarding mediation (.6); debrief regarding same (.6).	1.70	\$1,572.50
01/27/25	AMUE	Multiple communications with mediators regarding mediation.	0.80	\$740.00
01/27/25	MCM	Email correspondence with mediators regarding settings and related issues (.4); confer with Foley team regarding mediation issues (.3).	0.70	\$577.50
01/27/25	MDL	Multiple communications with C. Sontchi regarding logistics and parameters for tri-partite mediation.	0.20	\$160.00

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01/30/25	AMUE	Meeting with Judge Newsome regarding mediation.	0.80	\$740.00
01/31/25	EPM	Email correspondence and analysis regarding requests from insurers for determinations of claim viability in preparation for upcoming mediation sessions.	1.20	\$900.00

Task Total: 55.60 \$44,408.50

Services Total: 885.40 \$677,459.00

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Elizabeth P. Mazzocco	EPM	Associate	98.00	\$750.00	\$73,500.00
Jack R. Doti	JRDO	Associate	1.70	\$495.00	\$841.50
Joseph S. Harper	JSH	Associate	11.80	\$700.00	\$8,260.00
Mason Roberts	MR	Associate	29.20	\$690.00	\$20,148.00
Mary Rofaeil	MRL	Associate	15.90	\$570.00	\$9,063.00
Mikaela R. Mitcham	MRM	Associate	9.00	\$570.00	\$5,130.00
Matthew Kass	MTKS	Associate	3.00	\$475.00	\$1,425.00
Nora McGuffey	NMCG	Associate	66.60	\$570.00	\$37,962.00
Shane J. Moses	SJM	Of Counsel	137.70	\$750.00	\$103,275.00
Janelle C. Harrison	JCH	Paralegal	37.40	\$300.00	\$11,220.00
Kerry A. Farrar	KAFA	Paralegal	16.90	\$395.00	\$6,675.50
Wendy DelValle	WD	Paralegal	1.00	\$395.00	\$395.00
Ann Marie Uetz	AMUE	Partner	135.60	\$925.00	\$125,430.00
Emil P. Khatchatourian	EPK	Partner	29.10	\$800.00	\$23,280.00
Eileen R. Ridley	ERR	Partner	28.00	\$975.00	\$27,300.00
Geoffrey S. Goodman	GSG	Partner	48.90	\$1,000.00	\$48,900.00
Jeff R. Blease	JRBL	Partner	0.50	\$1,275.00	\$637.50
Mark C. Moore	MCM	Partner	92.20	\$825.00	\$76,065.00
Matthew D. Lee	MDL	Partner	77.00	\$800.00	\$61,600.00
Thomas F. Carlucci	TFCA	Partner	4.30	\$1,325.00	\$5,697.50
Alan R. Ouellette	AROU	Senior Counsel	1.20	\$800.00	\$960.00
Tamar N. Dolcourt	TND	Special Counsel	40.40	\$735.00	\$29,694.00
Totals			885.40		\$677,459.00

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February 28, 2025

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$336.34
LSS - eDiscovery Services	\$3,700.00
Other Fees	\$344.00
Transportation / Travel Expenses	\$198.80
Expenses Incurred Total	\$4,579.14

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.

Expense Detail**Electronic Legal Research Services**

Date	Initials	Description	Amount
01/31/25	SJM	Docket Report. US CASES DOC ACCESS. US COURT RULES DOC ACCESS. Westlaw. AUDIO:1656-0.	\$336.34

LSS - eDiscovery Services

Date	Initials	Description	Amount
01/31/25	JRBL	LSS - eDiscovery Services.	\$3,700.00

Other Fees

Date	Initials	Description	Amount
01/31/25	23626	Certificate of Good Standing--VENDOR: U.S. BANK 01/27/25 for a pro hac vice application of Elizabeth Mazzocco in the RCBO BK case. -. Certificate of Good Standing--VENDOR: U.S. BANK 01/21/25 for a certificate of good standing for Elizabeth Mazzocco to include with her pro hac vice application in the RCBO case. -.	\$344.00

Transportation / Travel Expenses

Date	Initials	Description	Amount
01/30/25	MDL	Mileage--VENDOR: Matt Lee - Travel to Hilco Real Estate, LLC - 01/30/25.	\$198.80

Expense Total:	\$4,579.14
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Roman Catholic Bishop of Oakland
Attn: Attila Bardos
Chief Financial Officer
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: March 27, 2025
Invoice No.: 51035380
Our Ref. No.: 100845-0402

Services through February 28, 2025

Amount due for professional services rendered regarding Chapter 11 Bankruptcy \$637,824.00

Total Expenses: \$7,285.09

Amount Due: \$645,109.09

Please note that as of February 1, 2025, there may be certain matters on which hourly legal fees have been adjusted. This may or may not affect you. Please contact your principal attorney at the Firm if you have questions.

Please reference your invoice number 51035380 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of this invoice.

Federal Employer Number:
39-0473800

ROMAN CATHOLIC BISHOP OF OAKLAND

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Foley & Lardner LLP

March 27, 2025

Professional Services Detail**003 Automatic Stay**

02/03/25	AMUE	Analyze strategy for JCCP 5108 proceedings in light of Court's denial of Committee's motion to lift stay to try state court cases.	1.50	\$1,575.00
02/04/25	AMUE	Revisions to order regarding motion to lift stay in effort to resolve order.	0.90	\$945.00
02/06/25	AMUE	Further revisions to order regarding motion for relief from stay.	0.50	\$525.00
02/06/25	SJM	Respond to A. Uetz regarding order denying lift stay motion (.2); revise proposed order based on call with Committee counsel (.3); email to Committee counsel regarding same (.2).	0.70	\$612.50
02/07/25	EPK	Review revisions to the proposed order on the Committee's motion for relief from stay (.1); email correspondence with P. Pascuzzi and A. Uetz regarding JCCP 5108 co-defendant stay issues (.2); evaluate feedback received from S. Moses regarding same (.1).	0.40	\$350.00
02/07/25	SJM	Call with counsel for Archdiocese of San Francisco regarding approach to non-debtor stay issues in JCCP (.5); analyze second circuit decision regarding same (.5); email to A. Uetz regarding same (.2).	1.20	\$1,050.00
02/07/25	SJM	Review Committee edits to lift stay order (.2); attention to finalizing same (.1).	0.30	\$262.50
02/09/25	AMUE	Revisions to lift stay order regarding state court cases (.5); review outstanding orders to be submitted per agreement with Committee (.7).	1.20	\$1,260.00
02/10/25	EPK	Review revised and near-final form of order denying the Committee's lift-stay motion without prejudice.	0.10	\$87.50
02/10/25	SJM	Finalize order on Committee motion for relief from stay, including email correspondence with B. Weisenberg regarding final form of order.	0.30	\$262.50

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02/11/25	EPK	Email correspondence with Foley restructuring working group regarding the proposed form of lift-stay motion denial order and submission of same to the Court.	0.30	\$262.50
02/14/25	EPK	Follow up on status of proposed order denying the Committee's lift-stay motion with prejudice (.1); email correspondence with JCCP 5108 defense liaison counsel D. Zamora of Weintraub Tobin regarding as-entered lift-stay denial order (.1).	0.20	\$175.00
02/18/25	SJM	Email to E. Khatchatourian regarding issues related to stay.	0.30	\$262.50
02/20/25	AMUE	Meeting with R. Manns and E. Khatchatourian regarding state court cases.	0.80	\$840.00
Task Total:			8.70	\$8,470.00

004 Bankruptcy Litigation/Adversary Proceedings

02/03/25	GSG	Edit property of the estate stipulation.	0.40	\$420.00
02/03/25	JSH	Work on 9019 motion regarding Bennett Trust settlement.	0.30	\$240.00
02/04/25	AMUE	Analyze issue concerning property of the estate as it relates to the Committee's objection to OPF's proof of claim and adversary proceeding in attempt to settle the issue concerning church property (1.6); meeting with B. Weisenberg and Foley team regarding possible resolution (.5); revisions to proposed stipulation regarding same (.8).	2.90	\$3,045.00
02/04/25	GSG	Edit property of the estate stipulation (.5); telephone conference with team regarding same (.5).	1.00	\$1,050.00
02/04/25	MDL	Telephone conference with Foley team regarding revisions to property of the estate stipulation (partial).	0.30	\$262.50
02/04/25	MDL	Telephone conference with Lowenstein and Foley teams regarding property of the estate stipulation.	0.40	\$350.00
02/04/25	MDL	Evaluate property of the estate stipulation options.	0.30	\$262.50

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March 27, 2025

02/04/25	MDL	Revise proposed stipulation on property of the estate issues.	0.30	\$262.50
02/04/25	SJM	Prepare stipulation and orders to continue hearings on motions to dismiss and on objection to OPF claim.	2.60	\$2,275.00
02/04/25	SJM	Analyze issues regarding property of the estate stipulation (.4); emails with case team regarding revisions to same (1.1); prepare draft revision based on comments from team (.4).	1.90	\$1,662.50
02/05/25	GSG	Correspondence with A. Uetz regarding OPF claim issues and property of the estate.	0.20	\$210.00
02/05/25	SJM	Emails with A. Uetz and G. Goodman regarding stipulations to continue motion to dismiss hearings.	0.40	\$350.00
02/05/25	SJM	Email case team regarding analysis of OPF claim issue.	0.70	\$612.50
02/06/25	AMUE	Further revisions to proposed stipulation concerning property of the estate as it relates to OPF objection and adversary proceeding (.7); meeting with G. Goodman and S. Moses to finalize same (.3).	1.00	\$1,050.00
02/06/25	SJM	Call with A. Uetz and G. Goodman regarding property of the estate stipulation (.4); draft email to Committee counsel regarding same (.3).	0.70	\$612.50
02/06/25	SJM	Emails with case team regarding scheduling stipulations (.3); email to Committee counsel regarding same (.2).	0.50	\$437.50
02/07/25	GSG	Review Committee correspondence regarding property of the estate stipulation (.2); analyze next steps in light of same (.3).	0.50	\$525.00
02/07/25	JSH	Edit 9019 motion regarding Bennett Trust settlement (1.0); call with probate court counsel regarding Bennett Trust settlement (.3).	1.30	\$1,040.00
02/10/25	GSG	Correspondence with B. Weisenberg regarding property of the estate call.	0.10	\$105.00
02/10/25	JSH	Revise 9019 motion regarding Bennett Trust settlement (.9); call with probate court counsel regarding Bennett Trust settlement (.3).	1.20	\$960.00

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March 27, 2025

02/10/25	MDL	Evaluate status of Committee stipulations on property of the estate and motion practice.	0.20	\$175.00
02/10/25	SJM	Review comments from Committee counsel on stipulations to continue hearings (.3); call with C. Restel regarding same (.2).	0.50	\$437.50
02/11/25	EPK	Review email from J. Harper summarizing revisions to the Bennett Trust settlement motion (.1); brief review of the revised draft of the settlement motion and supporting documents (.2).	0.30	\$262.50
02/11/25	GSG	Telephone conference with B. Weisenberg regarding property of the estate stipulation.	0.50	\$525.00
02/11/25	JSH	Revise 9019 motion regarding Bennett Trust settlement and supporting declaration, proposed order and notice.	1.60	\$1,280.00
02/11/25	SJM	Revise stipulations for scheduling of motions to dismiss adversary proceedings based on agreement with Committee counsel (.5); emails with Committee counsel regarding same (.2).	0.70	\$612.50
02/12/25	AMUE	Strategize regarding property of the estate issues raised by adversary proceeding (1.2); meeting with G. Goodman and S. Moses regarding same (.4); review email received from B. Weisenberg regarding same (.3).	1.90	\$1,995.00
02/12/25	GSG	Telephone conferences with B. Weisenberg regarding property of the estate OPF (.8); telephone conference with A. Uetz regarding same (.4); review B. Weisenberg correspondence regarding OPF claim (.2).	1.40	\$1,470.00
02/12/25	SJM	Review Committee draft stipulation on 546(a) deadline (.3); analyze issues regarding property of the estate stipulation (.5).	0.80	\$700.00
02/12/25	SJM	Call with A. Uetz and G. Goodman regarding property of the estate stipulation (.4); follow up on same (.2).	0.60	\$525.00
02/13/25	SJM	Email to Committee counsel regarding Committee draft stipulation on 546(a) deadline.	0.30	\$262.50
02/14/25	JCH	Finalize opposition to Committee's brief.	0.50	\$165.00

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02/19/25	SJM	Analyze Committee objections to motions to dismiss and evaluate arguments for reply (2.9); email to case team regarding same (.5).	3.40	\$2,975.00
02/20/25	AMUE	Communications with B. Weisenberg regarding objection to OPF claim (.4) and analyze issue related to same (.4).	0.80	\$840.00
02/20/25	GSG	Review Committee oppositions to motions to dismiss (.9); meet with S. Moses and N. McGuffey regarding same (.6); correspondence with R. Manns regarding same (.1).	1.60	\$1,680.00
02/20/25	JSH	Communications with probate counsel R. Lund regarding Bennett Trust settlement agreement.	0.20	\$160.00
02/20/25	NMCG	Review the Committee's oppositions to the motions to dismiss (1.5); discuss the same with G. Goodman and S. Moses (.5).	2.00	\$1,400.00
02/20/25	SJM	Email to client regarding Committee oppositions to motions to dismiss (.3); prepare for call regarding strategy for replies in support of motions to dismiss (.8); call with G. Goodman and N. McGuffey regarding same (.6).	1.70	\$1,487.50
02/21/25	NMCG	Meeting with G. Goodman and Norton Rose regarding Committee's oppositions to motions to dismiss.	0.50	\$350.00
02/22/25	GSG	Review analysis on alter ego and substantive consolidation claims.	0.40	\$420.00
02/22/25	NMCG	Research issues related to reply in support of the motions to dismiss.	1.90	\$1,330.00
02/24/25	JSH	Communications with probate counsel R. Lund regarding Bennett Trust settlement agreement.	0.20	\$160.00
02/24/25	NMCG	Continue research for replies in support of the motions to dismiss (1.1); correspond with G. Goodman regarding the same (.5).	1.60	\$1,120.00
02/24/25	SJM	Work on reply in support of motion to dismiss Committee adversary proceeding against RCBO and RCWC.	4.10	\$3,587.50
02/25/25	EPK	Confer with G. Goodman regarding adversary proceeding motion to dismiss briefing issues.	0.10	\$87.50

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02/25/25	GSG	Review draft of motion to dismiss reply in RCWC adversary (.8); edit same (2.7); telephone conference and correspondence with S. Moses and N. McGuffey regarding same (.8); correspondence with team regarding possible adjournment (.3); telephone conference with R. Manns regarding replies and possible adjournment (.4); update M. Kemner and A. Bardos regarding motion to dismiss replies (.2).	5.20	\$5,460.00
02/25/25	NMCG	Draft part of the reply in support of the motion to dismiss regarding mootness argument (2.1); meeting with G. Goodman and S. Moses to discuss the draft replies and status of adversaries (.5).	2.60	\$1,820.00
02/25/25	SJM	Research regarding legal issues on pleading alter ego under California law.	3.50	\$3,062.50
02/25/25	SJM	Continue drafting reply in support of motion to dismiss complaint against Debtor and non-debtor Catholic entities.	6.10	\$5,337.50
02/25/25	SJM	Draft reply in support of motion to dismiss complaint against Debtor and OPF.	2.10	\$1,837.50
02/26/25	GSG	Review draft of motion to dismiss reply in OPF case and edit same (.9); edit and finalize motion to dismiss reply in RCWC case and reply in OPF case (2.8); telephone conference and correspondence with S. Moses regarding same (.6); correspondence with A. Uetz regarding same (.2); correspondence with M. Kemner regarding same (.2).	4.70	\$4,935.00
02/26/25	JCH	Revise Debtor's replies to objections to motions to dismiss (1.8); email correspondence with Foley team regarding same (.5); finalize and file replies in both adversary proceedings (.8).	3.10	\$1,023.00
02/26/25	NMCG	Research case law regarding whether alter ego claims are direct claims and other issues noted in the adversary reply briefs (2.7); revise replies briefs for filing (.5); correspond with Foley team regarding the same (.3).	3.50	\$2,450.00
02/26/25	SJM	Further work drafting reply in support of motion to dismiss Committee adversary proceeding against Debtor and OPF.	6.20	\$5,425.00

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02/26/25	SJM	Revise reply in support of motion to dismiss Committee adversary proceeding against Debtor and OPF based on comments from G. Goodman (.8); final review of reply in support of motion to dismiss Committee adversary proceeding against Debtor and non-debtor Catholic entities (.5); finalize replies (.4).	1.70	\$1,487.50
02/27/25	GSG	Review OPF claim stipulation (.2); edit same (.2); telephone conference and correspondence with R. Manns regarding same (.3); telephone conference with A. Uetz regarding OPF and motions to dismiss (.3).	1.00	\$1,050.00
02/27/25	TND	Prepare stipulation and proposed order regarding withdrawal of OPF claim.	0.90	\$720.00
02/28/25	GSG	Telephone conference with B. Weisenberg regarding motions to dismiss and 3-4 hearing (.3); telephone conferences with Norton Rose regarding 3-4 hearing and related issues (.6); correspondence with R. Manns regarding OPF claim stipulation (.2); correspondence with Committee regarding property of the estate stipulation (.2); review revised property of the estate stipulation (.3); correspondence with team regarding motion to dismiss hearing and Committee matters (.4); begin preparing for motion to dismiss hearing (1.2).	3.20	\$3,360.00
02/28/25	NMCG	Help prepare G. Goodman for hearing on the motions to dismiss.	1.00	\$700.00
02/28/25	SJM	Call with G. Goodman, R. Manns, and J. Blanchard regarding approach to hearing on motions to dismiss Committee adversary proceedings (.2); further call regarding same (.5); analyze Committee edits to property of the estate stipulation (.6).	1.30	\$1,137.50
Task Total:			90.90	\$79,545.50

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

02/04/25	MCM	Conference call with Committee counsel regarding misfiled claims by certain counsel to Committee member and related issues that may give rise to need to amend.	0.50	\$462.50
02/04/25	MCM	Email correspondence with Committee counsel regarding misfiled claim by counsel to a Committee member.	0.30	\$277.50
02/05/25	MCM	Analysis of issues raised by Committee counsel regarding misfiled claims (.8); email correspondence with Committee counsel regarding same (.5).	1.30	\$1,202.50
02/06/25	MCM	Email correspondence with KCC/Verita regarding updated abuse claims register (.2); review same for amended or additional duplicate claims (.4); email correspondence with Committee counsel regarding misfiled claims and reconciliation of same (.3); call with KCC/Verita regarding potential solicitation issue with claims filed under wrong name (.4); analysis of solicitation issues regarding claims (.2).	1.50	\$1,387.50
02/07/25	KAFA	Strategize updates to Master Claims Review analysis to include claimant date of birth and age at the time of abuse (1.5); call with M. Moore regarding same (.3); call with M. Moore and J. Harrison regarding state court case bucketing project (.3).	2.10	\$945.00
02/09/25	MCM	Continue analysis of claims following information requests from various parties in connection with disclosure statement.	0.80	\$740.00
02/10/25	KAFA	Update Master Claims Review analysis to include claimant date of birth and age at the time of abuse.	5.80	\$2,610.00
02/11/25	KAFA	Update Master Claims Review analysis to include claimant date of birth and age at the time of abuse.	4.30	\$1,935.00
02/13/25	MRL	Confer with M. Roberts regarding reviewing sexual abuse claims based on perpetrators.	0.20	\$135.00
02/17/25	EPK	Evaluate confidentiality issues relating to abuse proofs of claim.	0.20	\$175.00

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02/20/25	KAFA	Analysis of late-filed proofs of claim in anticipation of production to insurers.	0.50	\$225.00
02/21/25	EPK	Emails with R. Manns of NRF and M. Moore regarding proposed form of amended bar date order to address RCWC confidentiality issues (.2); review proposed amendment to the bar date order (.1).	0.30	\$262.50
02/21/25	JCH	Prepare spreadsheet listing receipt of confidentiality agreements executed by insurer parties, indicating party sending agreements and party confirming execution of agreements.	1.00	\$330.00
02/25/25	EPK	Follow up on proposed amendment to the bar date order confidentiality protocol.	0.10	\$87.50
02/25/25	JCH	Update spreadsheet of confidentiality agreements executed by insurer parties.	0.70	\$231.00
02/26/25	EPK	Email correspondence with B. Weisenberg of Lowenstein and R. Manns of NRF regarding proposed amendment to the bar date order confidentiality protocol.	0.20	\$175.00
02/27/25	EPK	Email correspondence with R. Manns of NRF regarding further revised draft of amended bar date order and confidentiality protocol (.1); review proposed stipulation between RCBO, the Committee, and RCWC regarding same (.1).	0.20	\$175.00
02/28/25	MCM	Attention to issues concerning amended claims filed or to be filed by state court counsel for Committee chairman following defective earlier filings.	0.30	\$277.50
Task Total:			20.30	\$11,633.50

006 Case Administration (docket updates, WIP, and calendar)

02/03/25	JCH	Update daily docket report.	0.50	\$165.00
02/04/25	JCH	Update daily docket report.	0.20	\$66.00
02/05/25	EPK	Comment on this week's updates to the master case calendar.	0.10	\$87.50

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02/05/25	JCH	Update Timeline and Master Case Calendar and email same to J. Harper for review (.5); update daily docket report (.5).	1.00	\$330.00
02/06/25	JCH	Update daily docket report.	0.50	\$165.00
02/06/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.50	\$400.00
02/07/25	JCH	Prepare (.1) and file (.1) Notice of Core Service List as of February 7, 2025; update daily docket report (.2).	0.40	\$132.00
02/07/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.80	\$540.00
02/10/25	JCH	Update daily docket report.	0.20	\$66.00
02/11/25	JCH	Update daily docket report.	0.50	\$165.00
02/12/25	JCH	Update daily docket report.	0.50	\$165.00
02/12/25	JCH	Calendar multiple extended deadlines related to stipulation filed in adversary proceedings.	0.50	\$165.00
02/13/25	JCH	Update daily docket report.	0.50	\$165.00
02/14/25	JCH	Update daily docket report.	0.50	\$165.00
02/17/25	EPK	Email correspondence with J. Harper and J. Harrison regarding this week's updates to the master case calendar (.2); review upcoming estate reporting obligation deadlines (.1).	0.30	\$262.50
02/17/25	JCH	Update Timeline and Master Case Calendar and email same to J. Harper for review (.5); prepare weekly update and circulate to Foley group (.5); circulate updated Timeline and Master Case Calendar (.2); update daily docket report (.2).	1.40	\$462.00
02/17/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.60	\$480.00
02/18/25	JCH	File 2015.3 Period Report regarding CTN (.2); update daily docket report (.5).	0.70	\$231.00
02/19/25	JCH	Update daily docket report.	0.50	\$165.00
02/20/25	JCH	Update daily docket report.	0.50	\$165.00
02/21/25	JCH	Update daily docket report.	0.50	\$165.00

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02/23/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.70	\$472.50
02/24/25	EPK	Confer with J. Harper and J. Harrison regarding this week's updates to the master case calendar and specific dates relating to pending adversary proceedings.	0.20	\$175.00
02/24/25	JCH	Revise Timeline and Master Case Calendar and send to J. Harper for review (.5); update daily docket report (.5).	1.00	\$330.00
02/24/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.30	\$240.00
02/24/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.50	\$337.50
02/25/25	JCH	Update daily docket report.	0.50	\$165.00
02/25/25	MRL	Finalize summarizing daily docket activity and upcoming deadlines for client.	0.30	\$202.50
02/26/25	JCH	Update daily docket report.	0.50	\$165.00
02/27/25	JCH	Calendar updated matters (.2); update daily docket report (.2).	0.40	\$132.00
02/28/25	JCH	Update daily docket report.	0.50	\$165.00
Task Total:			16.10	\$7,091.50

007 Chapter 11 Plan/ Plan Confirmation

02/09/25	MCM	Analysis of other diocesan and religious-order bankruptcy cases regarding insurance assignment risks and disclosures of same.	1.00	\$925.00
02/10/25	MCM	Analysis of parish issues in other diocesan bankruptcy cases and restructurings.	0.80	\$740.00
02/11/25	ERR	Edit plan amendment regarding insurance issues.	0.90	\$990.00
02/13/25	MDL	Revise chapter 11 plan.	2.20	\$1,925.00
02/17/25	MCM	Revise Trust Distribution Plan and Settlement Agreement based on revisions to disclosure statement and plan documents eliminating neutral and incorporating re-review by Abuse Claims Reviewer, among other changes.	1.10	\$1,017.50

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02/18/25	JCH	Finalize and file second amended plan (.5); prepare redline for filing with notice (.2).	0.70	\$231.00
02/18/25	MRM	Analysis in connection with discovery, for plan issues.	0.70	\$472.50
02/19/25	MCM	Email correspondence with Foley team regarding plan issues.	0.60	\$555.00
02/20/25	MRM	Analysis in connection with discovery for plan issues.	3.10	\$2,092.50
02/21/25	MDL	Evaluate reorganization strategy in light of client feedback.	0.50	\$437.50
02/21/25	MRM	Draft Federal Rule of Bankruptcy Procedure 2004 Motion requesting discovery be conducted against Committee in connection with dispute over plan confirmation (5.2); begin drafting discovery in connection with motion (2.0).	7.20	\$4,860.00
02/24/25	MRM	Analyze privileged issue concerning discovery in connection with dispute with Committee over plan confirmation.	3.60	\$2,430.00
02/25/25	MRM	Analyze privileged issue concerning discovery in connection with dispute with Committee over plan confirmation.	4.10	\$2,767.50
02/26/25	AMUE	Analyze plan amendment issues related to liquidation analysis (1.3) and related to insurance (1.1).	2.40	\$2,520.00
02/26/25	MRM	Draft discovery pursuant to Federal Rule of Civil Procedure 26 to Committee members in connection with dispute over plan, settlement, and plan confirmation.	6.20	\$4,185.00
02/27/25	MRM	Draft discovery pursuant to Federal Rule of Civil Procedure 26 to Committee members in connection with dispute over plan, settlement, and plan confirmation.	4.80	\$3,240.00
02/28/25	MRM	Revise discovery requests to Committee (.9); incorporate comments from team for finalizing discovery (2.9).	3.80	\$2,565.00
Task Total:			43.70	\$31,953.50

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008 Communications with Client

02/04/25	AMUE	Review strategy decks with leadership in preparation for mediation.	1.20	\$1,260.00
02/05/25	AMUE	Finalize lengthy communication to finance team regarding privileged matter concerning mediation (.8) and follow-up communications with team regarding same (.5).	1.30	\$1,365.00
02/05/25	AMUE	Finalize memo to client leadership regarding privileged matter concerning mediation.	1.50	\$1,575.00
02/05/25	AMUE	Communications with R. Medeiros concerning privileged matter related to claimants.	0.50	\$525.00
02/05/25	MDL	Revise communication to client leadership regarding mediation strategy.	0.50	\$437.50
02/06/25	AMUE	Communications with client leadership regarding privileged matter concerning mediation.	0.50	\$525.00
02/07/25	AMUE	Meeting with finance team to prepare for mediation (1.1) and follow up regarding same (.7).	1.80	\$1,890.00
02/07/25	MDL	Telephone conference with A. Uetz, VeraCruz, and A. Bardos regarding strategy upon return to mediation.	1.10	\$962.50
02/07/25	TND	Provide bankruptcy-related comments on client publication.	0.90	\$720.00
02/12/25	AMUE	Prepare for (1.3) and meeting with (1.5) finance team to prepare for amended disclosure statement and for mediation.	2.80	\$2,940.00
02/12/25	AMUE	Meeting with D. Flanagan regarding privileged real estate matter.	0.70	\$735.00
02/12/25	MDL	Participate in discussion with M. Kemner, A. Bardos, VeraCruz, A&M, and Foley teams regarding plan funding issues.	0.50	\$437.50
02/12/25	SJM	Prepare for (.5) and attend (1.5) client finance team call; email to Foley team regarding follow up to same (.2).	2.20	\$1,925.00
02/12/25	TND	Communications with A. Uetz on comments to RCBO publication (.1); mark up document (.3); call with H. Osman regarding same (.2).	0.60	\$480.00

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02/14/25	AMUE	Multiple communications with M. Kemner and A. Bardos regarding privileged matter concerning real estate (1.4); draft privileged document for Bishop Barber regarding same (.9).	2.30	\$2,415.00
02/18/25	AMUE	Revisions to draft document for Bishop Barber regarding OPF.	1.10	\$1,155.00
02/18/25	AMUE	Draft memorandum to A. Bardos and M. Kemner regarding privileged issue related to plan and disclosure statement amendment.	1.20	\$1,260.00
02/19/25	AMUE	Prepare for (.6) and meeting with (1.0) A. Bardos and M. Kemner regarding privileged issue concerning mediation; draft communication for Bishop Barber regarding OPF (1.1); communication with VeraCruz regarding assets utilized to support proposed plan of reorganization (.6).	3.30	\$3,465.00
02/21/25	AMUE	Prepare for meeting with Bishop Barber and finance team regarding mediation strategy (1.1) and lead meeting (1.6).	2.70	\$2,835.00
02/21/25	MDL	Telephone conference with Bishop Barber, A. Bardos, and M. Kemner regarding reorganization strategy.	1.60	\$1,400.00
02/25/25	AMUE	Communication with M. Kemner following mediation (.3); draft summary update for client regarding status of mediation (.9).	1.20	\$1,260.00
02/27/25	AMUE	Communications with M. Kemner regarding privileged matter concerning plan of reorganization (.8); privileged communication with finance team regarding cash management (.7).	1.50	\$1,575.00
02/27/25	SJM	Email to client regarding status of motions to dismiss Committee adversary proceedings.	0.20	\$175.00
02/28/25	AMUE	Communications with M. Kemner and A. Bardos regarding mediation.	0.50	\$525.00
Task Total:			31.70	\$31,842.50

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009 Corporate Governance and Board Issues

02/04/25	MSK	Analysis of OPF fund agreements and OPF organizational documents in connection with account management and related lending matters (.8); exchange correspondence (multiple) with J. Witt in connection therewith (.2); correspondence with A. Uetz, G. Goodman, and J. Witt regarding OPF fund agreements (.2).	1.20	\$1,050.00
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Task Total:	1.20	\$1,050.00
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012 Disclosure Statement

02/02/25	MCM	Analyze notes from meet and confer with Committee regarding necessary amendments and/or amplifications to disclosure statement (1.0); draft list of tasks in preparation for filing amendment on February 18 (.5).	1.50	\$1,387.50
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02/03/25	AMUE	Communications with M. Mason regarding property valuation (.6); review documents concerning real estate valuation (1.1).	1.70	\$1,785.00
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02/03/25	AMUE	Review Committee's objection to disclosure statement approval concerning bad faith issue to further strategy for hearing before Judge Lafferty.	1.40	\$1,470.00
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02/03/25	KAFA	Call with T. Dolcourt to discuss collection of documents to assist with Hilco real estate valuation process.	0.40	\$180.00
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02/03/25	MCM	Draft second amended plan and second amended disclosure statement in support of same (1.2); email memorandum to M. Lee and S. Moses regarding necessary amendments and assignments (.9); conference call with Foley team regarding amendments to plan documents (.5).	2.60	\$2,405.00
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02/03/25	SJM	Prepare for call with M. Moore regarding edits to disclosure statement including review of objections and prior disclosure statement (.7); call with M. Moore (.2).	0.90	\$787.50
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02/03/25	TND	Call with K. Farrar on documents to be used for Hilco analysis (.2); review documents for same (.1).	0.30	\$240.00
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02/04/25	MDL	Evaluate documents to be shared with Hilco for real estate valuation review.	1.60	\$1,400.00
02/04/25	MDL	Telephone conference with M. Moore regarding revisions to disclosure statement and potential alternative plan terms.	0.50	\$437.50
02/04/25	TND	Prepare information on real estate transactions, leases, and other information for Hilco team to complete real estate valuation project (2.6); telephone and email communications with M. Lee on same (.3).	2.90	\$2,320.00
02/05/25	MDL	Evaluate additional property-related documents to share with Hilco.	0.20	\$175.00
02/05/25	MRL	Analyze insurance assignments in other dioceses cases.	1.20	\$810.00
02/05/25	TND	Additional correspondence with Hilco team on materials needed for valuation project (.1); email with M. Lee on valuation matters (.1).	0.20	\$160.00
02/06/25	MRL	Finalize reviewing analysis of insurance assignments in other dioceses cases.	1.60	\$1,080.00
02/06/25	NMCG	Research precedent regarding insurance disclosures in disclosure statements.	0.90	\$630.00
02/07/25	EPM	Conference call with M. Moore regarding drafting brief on impact of plan on bad faith claim.	0.50	\$420.00
02/07/25	MCM	Revisions to second amended disclosure statement based on necessary amendments, clarifications, and amplifications (1.2); email correspondence with E. Mazzocco regarding necessary amendments to Risk Factors based on feedback from insurer parties (.3); analysis of other diocesan cases and parish outcomes (.4).	1.90	\$1,757.50
02/07/25	NMCG	Review precedent for disclosure statements regarding insurance assignments and discharge issues.	0.80	\$560.00
02/09/25	SJM	Work on revisions to second amended disclosure statement.	2.10	\$1,837.50
02/10/25	AMUE	Meeting with M. Moore, M. Lee and S. Moses to strategize regarding amendments to disclosure statement (.6); outline strategy for hearing on motion to approve disclosure statement (.9).	1.50	\$1,575.00

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02/10/25	EPM	Revise insurance risk disclosure section of amended disclosure statement.	1.30	\$1,092.00
02/10/25	MCM	Conference call with M. Lee regarding amendments to disclosure statement and plan following discussion with the Committee (1.1); revisions to disclosure statement (.7).	1.80	\$1,665.00
02/10/25	MCM	Prepare for (.2) and participate in (.6) conference call with A. Uetz, M. Lee, and S. Moses regarding mediation, plan, and disclosure statement issues.	0.80	\$740.00
02/10/25	MDL	Evaluate changes to disclosure statement and additional changes to be made.	0.80	\$700.00
02/10/25	MDL	Strategize with M. Moore regarding amendments to disclosure statement.	1.10	\$962.50
02/10/25	MDL	Analyze Committee's supplemental brief on insurance assignment issues.	0.20	\$175.00
02/10/25	SJM	Meeting with A. Uetz, M. Lee, and M. Moore regarding disclosure statement next steps and approach (.6); prepare for same (.6).	1.20	\$1,050.00
02/11/25	EPM	Revise insurance risks section of amended disclosure statement.	0.50	\$420.00
02/11/25	MCM	Analyze revisions to disclosure statement regarding risks associated with the Litigation Option (.5); analyze necessary revisions to plan documents consistent with removal of neutral option and other changes contemplated by second amended plan (.6).	1.10	\$1,017.50
02/12/25	AMUE	Review transcripts from disclosure statement hearing to inform certain revisions to disclosure statement.	1.10	\$1,155.00
02/12/25	AMUE	Revisions to amended disclosure statement based on meeting with finance team.	1.40	\$1,470.00
02/12/25	EPM	Draft response in opposition to Committee's brief regarding impact of bad faith claims on disclosure statement and plan (4.1); conference call with M. Lee and E. Ridley regarding strategy for same (.6).	4.70	\$3,948.00
02/12/25	MDL	Strategize for reply brief on insurance issues with E. Ridley and E. Mazzocco.	0.60	\$525.00

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02/12/25	MDL	Strategize with M. Moore regarding amendments to disclosure statement.	0.50	\$437.50
02/13/25	AMUE	Revisions to disclosure statement to account for Judge Lafferty's comments to date (2.9); meeting with D. Flanagan and M. Lee to review certain revisions to disclosure statement (1.2); multiple (>5) communications with M. Kemner and A. Bardos regarding revisions to disclosure statement (1.1) and make further changes to align with their comments (1.1).	6.30	\$6,615.00
02/13/25	AMUE	Review Committee's brief regarding assignment of insurance/bad faith issue (.4) and provide direction to align Foley team on reply to same (.4).	0.80	\$840.00
02/13/25	EPM	Continue drafting response in opposition to Committee's brief regarding the plan and disclosure statement's impact on bad faith claims (6.0); legal research in support of same (3.3).	9.30	\$7,812.00
02/13/25	MCM	Conference call with M. Lee regarding second amended plan terms and potential modification of same (.5); revise Executive Summary of second amended disclosure statement and circulate to M. Lee for review (.7); follow up regarding same and further revisions to second amended disclosure statement (.6); revise brief in response to Committee statement on insurance assignment and email correspondence regarding same (1.1).	2.90	\$2,682.50
02/13/25	MDL	Email correspondence to Lowenstein regarding drafts of revised plan and disclosure statement.	0.20	\$175.00
02/13/25	MDL	Revise draft of amended disclosure statement.	2.40	\$2,100.00
02/13/25	MDL	Telephone conference with A. Uetz and D. Flanagan (VeraCruz) regarding real estate-related disclosures in disclosure statement.	1.20	\$1,050.00
02/13/25	MDL	Strategize with Foley team regarding revisions to disclosure statement.	0.60	\$525.00
02/13/25	MDL	Email exchange with counsel for insurers regarding drafts of revised plan and disclosure statement.	0.30	\$262.50

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02/13/25	SJM	Revise brief on insurance bad faith issues (3.1); call with E. Mazzocco regarding edits to same (.5).	3.60	\$3,150.00
02/14/25	AMUE	Analyze revisions to amended disclosure statement based on client's input regarding same.	1.90	\$1,995.00
02/14/25	EPM	Revise brief in opposition to Committee's brief regarding the impact of the disclosure statement and plan on bad faith claims (3.6); conduct citation check of same (1.0).	4.60	\$3,864.00
02/14/25	ERR	Review draft of insurers' brief against Committee position on disclosure statement and edits to Debtor brief related thereto.	1.30	\$1,430.00
02/14/25	MCM	Revisions to brief in opposition to Committee statement on insurance assignment (.6); email correspondence regarding same (.3); further revisions to second amended disclosure statement based on feedback from Foley team (.5); review comments to brief in opposition and respond to same with client parties (.4).	1.80	\$1,665.00
02/14/25	MDL	Revise brief in opposition to Committee's position on insurance assignment and bad faith claim issues.	1.20	\$1,050.00
02/14/25	SJM	Assist with finalizing opposition to Committee brief on insurance issues in light of comments from insurers.	1.20	\$1,050.00
02/15/25	EPK	Review RCBO's brief in opposition to the Committee's brief regarding the Court's disclosure-related memorandum.	0.20	\$175.00
02/17/25	AMUE	Analyze real estate for purposes of liquidation analysis (1.2); multiple communications with Hilco and VeraCruz teams regarding same (.8); review Committee comments to draft amended disclosure statement (.8).	2.80	\$2,940.00
02/17/25	MCM	Review issues list from Committee regarding second amended disclosure statement.	0.50	\$462.50
02/17/25	MDL	Analyze Committee redline and comments to draft amended disclosure statement.	0.60	\$525.00

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02/17/25	SJM	Call with A. Uetz and Hilco team regarding Hilco valuation analysis and preliminary findings (1.2); review and compare Hilco findings to prior valuations (.8); analyze implications for liquidation analysis (.4).	2.40	\$2,100.00
02/18/25	AMUE	Meeting with C. Moore regarding liquidation analysis.	0.30	\$315.00
02/18/25	AMUE	Provide advice to Foley team regarding amended disclosure statement to be filed today.	0.90	\$945.00
02/18/25	AMUE	Meeting with Hilco and finance team regarding valuation of real estate (1.5); analyze privileged issue related to liquidation analysis (1.2).	2.70	\$2,835.00
02/18/25	JCH	Finalize second amended disclosure statement and exhibits for filing (.5); prepare redline against amended disclosure statement and revise notice regarding same (.5); file second amended disclosure statement and exhibits (.5).	1.50	\$495.00
02/18/25	MCM	Strategy meeting with Foley team regarding liquidation analysis and related issues prior to filing deadline for second amended disclosure statement (partial) (1.0); prepare for and participate in meet and confer with Committee regarding second amended disclosure statement (.7); email and telephone communications with Foley team regarding potential continuance of hearing regarding same (.4); revise disclosure statement with M. Lee (.4).	2.50	\$2,312.50
02/18/25	MDL	Telephone conference with Hilco team and Foley team regarding property review and valuation analysis.	1.60	\$1,400.00
02/18/25	MDL	Evaluate additional amendments to disclosure statement.	0.30	\$262.50
02/18/25	MDL	Revise amended disclosure statement in advance of filing.	2.30	\$2,012.50
02/18/25	MDL	Strategize with Foley team regarding amendments to plan and disclosure statement (only participated in part of the call).	1.10	\$962.50

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02/18/25	SJM	Call with A. Uetz, M. Lee, and M. Moore regarding next steps on amended plan and disclosure statement and related issues (1.4); call with M. Lee regarding approach to liquidation analysis and plan amendments (.7).	2.10	\$1,837.50
02/18/25	SJM	Draft notice of filing of redlines of second amended plan and disclosure statement (.7); attention to filing of corrected version of same (.6).	1.30	\$1,137.50
02/18/25	SJM	Further call with Hilco and VeraCruz to review valuation and issues regarding specific properties (1.5); draft notes regarding meeting (.4).	1.90	\$1,662.50
02/18/25	SJM	Call with M. Lee, M. Moore, and Committee counsel regarding open issues on disclosure statement (.7); email to team regarding next steps in light of same (.1); emails with case team in light of Committee refusal to continue hearing and deadlines (.3); work on finalizing second amended plan and disclosure statement (.8).	1.90	\$1,662.50
02/19/25	AMUE	Analyze privileged information regarding real estate valuation (1.4); meeting with Hilco team regarding real estate valuation (1.0); follow-on work regarding liquidation analysis (1.4).	3.80	\$3,990.00
02/19/25	JCH	Prepare (.4) and file (.1) notice of withdrawal of second amended disclosure statement and notice of filing of redlines; finalize (.4) and file (.1) corrected second amended disclosure statement and related notice of filing of redlines.	1.00	\$330.00
02/19/25	MDL	Prepare corrected version of second amended disclosure statement.	0.30	\$262.50
02/19/25	MDL	Telephone conference with Hilco team and Foley team regarding property valuation issues and work product questions.	1.10	\$962.50
02/19/25	SJM	Attention to filing disclosure statement, including redlines of same.	0.80	\$700.00
02/19/25	SJM	Further call with Hilco and M. Lee regarding real property valuation issues (1.1); call with M. Lee regarding same (.2); draft update to case team regarding same (.6).	1.90	\$1,662.50

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02/20/25	AMUE	Meeting with J. Azuse regarding valuation (.3); analyze liquidation analysis issue (1.1).	1.40	\$1,470.00
02/20/25	MDL	Telephone conference with C. Moore regarding supplemental liquidation analysis.	0.10	\$87.50
02/20/25	MDL	Evaluate draft property valuation summary and impact of same on supplemental liquidation analysis.	1.10	\$962.50
02/20/25	SJM	Further call with Hilco and VeraCruz regarding property valuation issues (.6); email to case team regarding follow-up from same (.3).	0.90	\$787.50
02/21/25	AMUE	Analyze privileged issue concerning liquidation analysis.	1.30	\$1,365.00
02/21/25	MCM	Email and telephone communications with Foley team regarding liquidation analysis and disclosure statement issues.	0.60	\$555.00
02/21/25	MDL	Analyze supplemental liquidation analysis.	1.80	\$1,575.00
02/21/25	MDL	Analyze draft liquidation valuation summary.	0.60	\$525.00
02/21/25	MDL	Email exchange with C. Moore (A&M) regarding valuation issues and revised supplemental liquidation analysis.	1.10	\$962.50
02/21/25	MDL	Telephone conferences with C. Moore (A&M) regarding supplemental liquidation analysis.	0.50	\$437.50
02/21/25	MDL	Email exchange with A. Zimmerman and C. Parthum of Hilco regarding property valuations.	0.40	\$350.00
02/21/25	MDL	Telephone conference with Hilco and Foley teams regarding property valuations.	0.40	\$350.00
02/21/25	SJM	Further call with Hilco regarding finalizing valuation report.	0.20	\$175.00
02/22/25	MDL	Email exchange with C. Moore (A&M) regarding valuation considerations.	0.50	\$437.50
02/22/25	MDL	Revise supplemental liquidation analysis.	0.20	\$175.00
02/22/25	MDL	Telephone conference with C. Moore (A&M) regarding detail points in supplemental liquidation analysis.	0.40	\$350.00
02/23/25	AMUE	Finalize liquidation analysis including communications with C. Moore.	3.10	\$3,255.00

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02/23/25	MCM	Analyze alternate liquidation analysis prior to filing of same.	0.60	\$555.00
02/23/25	MDL	Analyze revised supplemental liquidation analysis.	0.60	\$525.00
02/23/25	SJM	Calls with C. Moore regarding liquidation analysis (.4); analyze issues regarding treatment of property in liquidation analysis (1.2); multiple revisions to text of liquidation analysis based on comments from M. Lee and C. Moore (1.3); email correspondence with Hilco regarding property valuation and related issue for liquidation analysis (.4); finalize liquidation analysis for filing (.5); draft notice of filing of revised liquidation analysis (.3).	4.10	\$3,587.50
02/24/25	MCM	Analyze Committee objection to second amended disclosure statement (.7); begin draft reply to same for filing on 2/26 (.7).	1.40	\$1,295.00
02/24/25	SJM	Analyze arguments in Committee objection to amended disclosure statement in order to prepare detailed chart of objections.	2.10	\$1,837.50
02/24/25	SJM	Email correspondence with Committee counsel and Verita regarding incomplete redaction of confidential information in Committee objection to disclosure statement.	0.80	\$700.00
02/25/25	MCM	Analyze issues list from prior meet and confer with Committee counsel regarding amended disclosure statement (.4); draft reply to Committee objection to second amended disclosure statement (1.5); review transcripts of prior hearings regarding disclosure statement approval and related issues and incorporate same into draft (.5); email correspondence regarding plan and disclosure statement issues (.4); further revisions to reply to Committee objection following discussion with Foley team (.5).	3.30	\$3,052.50
02/25/25	SJM	Attention to potential dates for continued disclosure statement hearing.	0.20	\$175.00
02/26/25	JCH	Revise Debtor's reply to Committee's objection to second amended disclosure statement (.2); email correspondence with Foley team regarding reply (.2); finalize and file reply (.2).	0.60	\$198.00

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02/26/25	MCM	Revise reply to Committee objection to disclosure statement and circulate to Foley team for review (1.0); further revisions following input from various parties (.4); analysis of potential continuance of disclosure statement hearing based on mediation discussions (.5); finalize and approve reply to Committee objection to disclosure statement (.7).	2.60	\$2,405.00
02/26/25	MDL	Revise reply brief in support of amended disclosure statement.	1.30	\$1,137.50
02/26/25	SJM	Work on reply in support of second amended disclosure statement.	2.60	\$2,275.00
02/27/25	MDL	Revise notice of status conference and continued disclosure statement hearing.	0.20	\$175.00
02/27/25	SJM	Email correspondence with case team regarding strategy for continuance of disclosure statement hearing (.3); call to chambers regarding available dates (.1); call to M. Plevin regarding same (.1); call to T. Schiavoni regarding same (.3); draft notice of continuance (.6).	1.40	\$1,225.00
02/28/25	SJM	Begin review of further edits needed to disclosure statement for third amendment.	0.70	\$612.50
Task Total:			154.30	\$138,566.50

015 Executory Contracts/ Lease Issues

02/19/25	EPK	Assess need for further extension of the lease assumption deadline as it relates to the Cathedral lease arrangements.	0.10	\$87.50
02/19/25	SJM	Email to case team regarding need to further extend CCCEB lease assumption/rejection deadline.	0.20	\$175.00
Task Total:			0.30	\$262.50

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016 General Case Strategy (includes team calls)

02/02/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.70	\$472.50
02/03/25	AMUE	Meeting with P. Pascuzzi regarding developments in various diocese cases to inform RCBO.	1.00	\$1,050.00
02/04/25	SJM	Revise draft email to client regarding renewed mediation.	0.40	\$350.00
02/07/25	EPK	Confer with S. Moses regarding non-debtor stay issues and related strategy (.6); analyze case law input from S. Moses relating to same (.2).	0.80	\$700.00
02/10/25	EPK	Conference call with A. Uetz, M. Moore, and S. Moses to discuss JCCP 5108 coordination and automatic stay issues.	0.70	\$612.50
02/10/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$540.00
02/10/25	SJM	Prepare for meeting regarding stay issues in connection with state court litigation (.3); meeting with E. Khatchatourian, M. Moore, and A. Uetz regarding same and related issues (.6).	0.90	\$787.50
02/12/25	SJM	Analyze diocese of Rochester decision and implications for non-debtor releases.	0.40	\$350.00
02/18/25	MDL	Strategize regarding impact of property review and valuation analysis on disclosure statement and best interest test analysis.	0.20	\$175.00
02/18/25	MRL	Provide information to M. Moore regarding status of the Norwich bankruptcy case.	0.20	\$135.00
02/19/25	EPK	Foley restructuring team coordination regarding non-debtor co-defendant and tort claim analysis, including email correspondence with A. Uetz regarding same (.9); review internal work product relating to same (.2).	1.10	\$962.50
02/20/25	MDL	Participate in call with Hilco and Foley teams regarding property valuation issues.	0.60	\$525.00
02/24/25	MRL	Review pending dioceses cases to provide an update on their status to client.	1.40	\$945.00

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02/26/25	AMUE	Mediation debrief (1.4); strategize regarding upcoming hearing schedule for disclosure statement, motions to dismiss and OPF claim objection in light of Committee not agreeing to proposed stipulation for 30-day stand down (1.3).	2.70	\$2,835.00
02/26/25	MCM	Email and telephone communications with Foley team regarding go-forward strategy following mediation.	0.40	\$370.00
02/27/25	AMUE	Meeting with Foley core team to develop post-mediation strategy and action items (1.0); prepare for same (1.7); meeting with A. Cotrell regarding privacy issue (.5).	3.20	\$3,360.00
02/27/25	EPM	Preparation for call with A. Uetz, M. Moore, S. Moses, and G. Goodman regarding bankruptcy case and related insurance matters.	0.50	\$420.00
02/27/25	EPM	Conference call with A. Uetz, M. Moore, S. Moses, and G. Goodman regarding bankruptcy case and related insurance matters (partial).	0.70	\$588.00
02/27/25	GSG	Telephone conference with team regarding litigation matters, OPF and other issues.	1.00	\$1,050.00
02/27/25	MCM	Strategy call with Foley team regarding various workstreams and tasks going forward (1.0); follow-up email correspondence regarding same (.4).	1.40	\$1,295.00
02/27/25	MDL	Participate in all-hands Foley team call following mediation to strategize for case end game (only joined part of the call).	0.70	\$612.50
02/27/25	SJM	Meeting with Foley team regarding next steps in light of mediation (1.1); draft notes regarding meeting and action items (.5).	1.60	\$1,400.00
02/27/25	TND	All-hands call with Foley team on various outstanding matters.	1.10	\$880.00
02/28/25	MDL	Strategize with Foley team regarding 3/3 status conference and possible continuance of motion to dismiss hearing.	0.20	\$175.00
Task Total:			22.70	\$20,590.50

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018 Non-Bankruptcy Litigation

02/03/25	EPK	Conference call with the Foley restructuring working group to discuss JCCP 5108 co-defendant stay issues (.7); email correspondence with M. Moore regarding analysis of master JCCP 5108 case list (.1).	0.80	\$700.00
02/03/25	EPK	Begin drafting insert for the next case management statement for JCCP 5108.	0.70	\$612.50
02/03/25	MCM	Conference call regarding JCCP 5108 proceeding and next steps.	0.50	\$462.50
02/03/25	MDL	Strategize with Foley team regarding potential state court actions against certain co-defendants.	0.70	\$612.50
02/03/25	SJM	Call with A. Uetz, M. Lee, and E. Khatchatourian regarding strategy in light of new JCCP judge approach to non-debtor stay issues.	0.70	\$612.50
02/04/25	EPK	Review email from R. Donahoo of Donahoo & Associates regarding request for meet and confer relating to claims against non-debtor defendants (.1); discussion with S. Moses regarding same and non-debtor co-defendant issues (.6); separate email correspondence with A. Ouellette regarding same (.2).	0.90	\$787.50
02/05/25	EPK	Confer with M. Moore regarding status of analysis of the JCCP 5108 master case list (.2); analyze Judge Chatterjee's CMC order requirements (.2).	0.40	\$350.00
02/05/25	MCM	Review email correspondence regarding "bucketing" of claims for JCCP 5108 purposes (.4); meeting with Foley team regarding same (.3).	0.70	\$647.50
02/06/25	EPK	Develop strategy relating to co-defendant issues in the JCCP 5108 (.2); email correspondence with A. Uetz regarding same (.2); oversee docketing of JCCP 5108 dates and deadlines and trial-scheduling items (.2); prepare for meet and confer call (.3); participate in meet and confer call with plaintiffs' and defendants' liaison counsel in the JCCP 5108 (1.0); analyze shared-insurance arrangements with RCWC and the schools (.2).	2.10	\$1,837.50
02/06/25	SJM	Attention to issues regarding filings in JCCP state court proceeding (.4); email to E. Khatchatourian regarding same (.3).	0.70	\$612.50

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02/09/25	AROU	Attention to status of JCCP 5108 and correspondence from plaintiffs' counsel regarding case management order.	0.30	\$262.50
02/09/25	EPK	Email correspondence with A. Ouellette regarding inbound inquiry from plaintiffs' counsel relating to co-defendant issues in the JCCP 5108.	0.20	\$175.00
02/10/25	AMUE	Meeting with Foley team to strategize regarding CMC report in the JCCP 5108 proceeding.	0.60	\$630.00
02/10/25	EPK	Follow up on status of internal analysis of the JCCP 5108 case list (.1); analyze case law discussing non-debtor co-defendant issues (.5).	0.60	\$525.00
02/10/25	MCM	Conference call with Foley team regarding JCCP 5108 and related issues (.5); follow-up email correspondence with J. Harrison regarding bucketing of claims (.2).	0.70	\$647.50
02/11/25	AROU	Attention to status of JCCP 5108 and correspondence from plaintiffs' counsel regarding case management order.	0.20	\$175.00
02/11/25	EPK	Draft proposed email to A. Bardos of RCBO regarding JCCP 5108 CMC order issues (.2); confer with A. Uetz and A. Ouellette regarding same (.3); email correspondence with D. Zamora of Weintraub Tobin regarding preliminary draft of JCCP 5108 CMC statement (.1); send email to A. Bardos of RCBO and R. Manns of Norton Rose Fulbright regarding representation of RCWC in the JCCP 5108 process (.2); follow-on email correspondence with R. Manns regarding same (.3); review discovery requests propounded by plaintiffs' counsel (.3).	1.40	\$1,225.00
02/11/25	MCM	Email correspondence regarding "bucketing" of claims pursuant to instructions from JCCP 5108 court.	0.30	\$277.50
02/11/25	SJM	Email to counsel for Archbishop of San Francisco regarding JCCP case management statement and non-debtor stay issues related to same.	0.20	\$175.00

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02/12/25	EPK	Email correspondence with A. Bardos of RCBO and R. Manns of Norton Rose Fulbright regarding discovery served on RCWC and representation of RCWC in the JCCP 5108 (.4); review related email correspondence from plaintiff's counsel (.4); conference call with A. Bardos and the Norton Rose Fulbright team to discuss JCCP 5108 issues and representation of non-debtor co-defendants (.4); post-call email correspondence with A. Uetz regarding same (.1).	1.30	\$1,137.50
02/13/25	AMUE	Communication with Foley litigation team necessary to provide advice regarding CMC report in light of state court counsel proceeding on cases against non-debtor defendants (.4); provide advice regarding same (.3).	0.70	\$735.00
02/13/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools.	2.40	\$2,100.00
02/13/25	EPK	Email correspondence with counsel for non-debtor co-defendants regarding JCCP 5108 matters and case list (.4); analyze non-debtor co-defendants' information, including analysis of refined co-defendant list and claims (1.1); call with D. Zamora of Weintraub Tobin to discuss same and upcoming JCCP 5108 CMC issues (.4); email correspondence with M. Moore regarding further analysis of non-debtor co-defendant cases and claims (.3); call with A. Ouellette to discuss procedural history for coordinated actions (.2); post-call email correspondence with A. Ouellette and T. Carlucci regarding analysis of same and proposed discussion with counsel to RCWC (.3).	2.70	\$2,362.50
02/13/25	JCH	Compare Foley's spreadsheet of affiliated co-defendant cases against JCCP Bucket 2 list.	1.00	\$330.00
02/13/25	MCM	Work on "bucketing" of claims in connection with JCCP 5108 and directives of coordination judge.	0.40	\$370.00
02/13/25	TFCA	Numerous emails with A. Ouellette regarding responding to Norton Rose request.	0.30	\$412.50
02/14/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools.	0.90	\$787.50

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02/14/25	KAFA	Compile claim information for JCCP 5108 lawsuits.	5.30	\$2,385.00
02/17/25	MCM	Email correspondence and analysis regarding "bucketing" of claims for purposes of JCCP and continuation of cases involving non-debtors.	0.40	\$370.00
02/18/25	AROU	Attention to motion to set trial date in Plaintiff J.S. case pending in JCCP 5108.	0.30	\$262.50
02/18/25	AROU	Call with RCWC's counsel regarding JCCP 5108.	0.80	\$700.00
02/18/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools.	2.70	\$2,362.50
02/18/25	EPK	Prepare chart of JCCP 5108 coordinated actions to be sent to counsel for RCWC and the schools (.2); email correspondence with R. Manns and J. Leito of Norton Rose Fulbright regarding same (.5); email correspondence with D. Zamora of Weintraub Tobin regarding draft of JCCP 5108 joint case management statement (.1); draft RCBO's positional statement to be included in same (.5); conference call with Foley and Norton Rose Fulbright litigation teams regarding JCCP 5108 issues (.9); coordinate with Foley restructuring team and A. Ouellette regarding same (.4); review motion filed by Donahoo firm relating to RCWC state court action (.1).	2.70	\$2,362.50
02/18/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	4.20	\$1,890.00
02/18/25	TFCA	Review spreadsheet and codes to prepare for call with Norton Rose (.5); telephone call with Norton Rose, E. Khatchatourian, and A. Ouellette regarding transition regarding 5108 for RCWC (.8).	1.30	\$1,787.50
02/19/25	AROU	Attention to JCCP 5108 orders governing discovery procedures.	1.40	\$1,225.00

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02/19/25	EPK	Email correspondence with A. Bardos regarding Judge Chatterjee's JCCP 5108 CMC order and non-debtor co-defendant issues (.3); continue drafting RCBO's insert for the JCCP 5108 joint case management statement (1.9); email correspondence with Foley restructuring team regarding comments to same (.1); email correspondence with R. Manns of Norton Rose Fulbright and A. Uetz regarding schools actions and JCCP 5108 CMC (.7); email correspondence with D. Zamora of Weintraub Tobin regarding preliminary draft of RCBO's insert for the JCCP 5108 joint CMC statement (.2).	3.20	\$2,800.00
02/19/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	0.90	\$405.00
02/20/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools and compile pleadings and discovery.	3.20	\$2,800.00
02/20/25	EPK	Conference call with R. Manns and J. Leito of Norton Rose Fulbright to discuss RCWC/schools co-defendant actions and JCCP 5108 matters (.7); coordinate with A. Ouellette and K. Farrar regarding pleadings to be provided to NRF team (.8); review analysis of claims and causes of action for non-debtor co-defendants prepared by A. Ouellette (.3); email correspondence with J. Leito of NRF regarding schools cases, service-related issues, and JCCP 5108 scheduling issues (.4); email correspondence with A. Bardos regarding status of JCCP 5108 actions and anticipated developments in same (.1).	2.30	\$2,012.50
02/20/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	3.10	\$1,395.00
02/20/25	MCM	Analysis of bucketing of claims pursuant to JCCP coordination judge requests.	0.50	\$462.50
02/21/25	AROU	Attention to JCCP 5108 case management conference statement.	0.30	\$262.50
02/21/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools and correspond with counsel for Roman Catholic Welfare Corporation.	0.80	\$700.00

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02/21/25	EPK	Email correspondence with R. Manns and J. Leito of NRF regarding comments to the JCCP 5108 joint case management statement and RCWC's diligence requests (.6); comment on proposed revisions to the statement (.5); review chart summarizing school cases and JCCP 5108 "buckets" (.2); email correspondence with liaison counsel D. Zamora of Weintraub Tobin and other defense counsel regarding revisions to the case management statement and new lists received from R. Simons (.6); short call with J. Leito to discuss next week's JCCP 5108 CMC (.2); post-call email correspondence with J. Leito regarding confidentiality issues and next week's JCCP 5108 CMC (.5); email correspondence with R. Simons regarding new list of JCCP 5108 cases (.2); review diligence requests received and provided to J. Leito of NRF (.2).	3.00	\$2,625.00
02/21/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	0.50	\$225.00
02/21/25	TFCA	Emails with N. Rose regarding clarifying current status of various cases (.2); emails with A. Ouellette and E. Khatchatourian (.2).	0.40	\$550.00
02/24/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools and correspond with counsel for Roman Catholic Welfare Corporation.	0.50	\$437.50
02/24/25	EPK	Review as-submitted JCCP 5108 joint case management statement (.2); email correspondence with A. Bardos regarding this week's JCCP 5108 CMC (.2).	0.40	\$350.00
02/24/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	2.60	\$1,170.00
02/25/25	AROU	Compile documents relating to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation.	1.40	\$1,225.00
02/25/25	EPK	Further review of the 150-page joint JCCP 5108 case management statement (.3); email correspondence with D. Zamora of Weintraub Tobin regarding trial case lists (.2); confer with K. Farrar and A. Ouellette regarding pleadings and documents to be sent to NRF team (.2).	0.70	\$612.50

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02/25/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	4.10	\$1,845.00
02/26/25	AROU	Respond to correspondence from Manly firm regarding JCCP 5108 cases.	0.30	\$262.50
02/26/25	EPK	Review CMC order requirements and positional statements of each diocesan debtor set forth in the 150-page joint JCCP 5108 case management statement (.7); attend the monthly case management conference in the JCCP 5108 (1.2); email correspondence with the Foley restructuring team regarding the results of the conference (.3); email correspondence with Manly firm legal assistant regarding five-year rule issue (.2).	2.40	\$2,100.00
02/27/25	AROU	Attention to correspondence from Manly firm regarding JCCP 5108 cases.	0.10	\$87.50
02/27/25	AROU	Attention to status of cases involving the Roman Catholic Welfare Corporation.	0.60	\$525.00
02/27/25	EPK	Email correspondence with Manly firm regarding proposed stipulation relating to five-year rule (.1); confer with A. Ouellette regarding same (.1); email correspondence with counsel for RCWC, R. Manns and C. Pelham of NRF, regarding JCCP 5108 appearances for the schools (.3); confer with A. Ouellette regarding same (.2).	0.70	\$612.50
02/28/25	AROU	Call and correspond with counsel for Roman Catholic Welfare Corporation.	0.60	\$525.00
02/28/25	EPK	Email correspondence with C. Pelham of NRF regarding RCWC issues in the JCCP 5108 process.	0.20	\$175.00
Task Total:			74.30	\$57,072.50

020 Retention/Billing/Fee Applications for Debtor Professionals

02/03/25	TND	Call with S. Moses on Fifth Interim Fee Application (.5); correspond with E. Mazzocco on additional information needed for application (.2).	0.70	\$560.00
02/04/25	TND	Communications with E. Mazzocco on insurance section of Fifth Interim Fee App (.1); review information needed for application (.2).	0.30	\$240.00

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02/05/25	TND	Further preparation of Foley's Fifth Interim Fee App (3.8); communications with A&M regarding its Fifth Interim Application (.2); email to J. Breall on hearing date for Fifth Interim Applications (.1).	4.10	\$3,280.00
02/06/25	JCH	Prepare chart of fees billed by certain timekeepers on Foley's interim fee applications and email same to T. Dolcourt.	0.50	\$165.00
02/06/25	TND	Further drafting of Fifth Interim Fee Application (4.2); email communications with Foley team on same (.2).	4.40	\$3,520.00
02/10/25	EPM	Summarize fee statements from September - December, 2024 (1.7); draft summary of work in this time period for fee statement (1.8).	3.50	\$2,940.00
02/10/25	MDL	Analyze fifth interim fee application request for allowance of fees incurred by specific timekeepers.	0.10	\$87.50
02/10/25	SJM	Work on narratives and case update for Foley fifth interim fee application.	4.60	\$4,025.00
02/10/25	TND	Revise information on insurance task code for inclusion in Fifth Interim Fee Application (.4); communications with team on review of timekeepers under 15 hours for Application (.2).	0.60	\$480.00
02/11/25	AMUE	Provide advice to T. Dolcourt regarding fifth interim fee application.	0.60	\$630.00
02/11/25	JCH	Prepare certificates of no objection to Foley and A&M monthly fee statements (.5); prepare Uetz Declaration in support of Foley Fifth Interim Fee Application (.2).	0.70	\$231.00
02/11/25	SJM	Call with T. Dolcourt and A. Uetz regarding finalizing fifth interim fee application (.2); email to Committee counsel regarding schedule for hearing on fee applications (.1).	0.30	\$262.50
02/11/25	TND	Further revisions to Foley's Fifth Interim Fee Application (2.6); call with A. Uetz and S. Moses on same (.2); communications with A&M team on their application (.1).	2.90	\$2,320.00
02/12/25	JCH	File certificates of no objection to Foley and A&M monthly fee statements.	0.50	\$165.00

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02/12/25	TND	Revise A&M interim fee application (.7); communications with A&M on same (.2); emails with J. Breall on hearing date for next applications (.2); update Foley fee application with new docket entries and hearing date (.2).	1.30	\$1,040.00
02/13/25	TND	Revise Foley Fifth Interim Fee Application to incorporate significant comments from A. Uetz.	3.40	\$2,720.00
02/14/25	JCH	Final review of Foley Fifth Interim Fee Application to confirm amounts are correct (.5); finalize (.5) and file (.3) Foley and A&M Fifth Interim Fee Applications and Declarations in support; review Omnibus Notice of Hearing on interim fee applications (.2).	1.50	\$495.00
02/14/25	SJM	Work on Foley interim fee application.	1.40	\$1,225.00
02/14/25	SJM	Assist with finalizing Foley interim fee application (1.1); email to A. Uetz regarding options for addressing Committee's potential objection to Hilco ordinary course retention (.6).	1.70	\$1,487.50
02/14/25	TND	Finalize Fifth Interim Fee Application for Foley & Lardner.	1.60	\$1,280.00
02/17/25	TND	Review issues related to Hilco retention and connections check (.3); call with E. Mazzocco on billing matters (.1).	0.40	\$320.00
02/18/25	SJM	Prepare application to employ Hilco as a professional.	3.40	\$2,975.00
02/19/25	TND	Further work on January fee statement for Foley to ensure compliance with U.S. Trustee guidance.	0.80	\$640.00
02/20/25	SJM	Email correspondence with other professionals and U.S. Trustee regarding LEDES files.	0.20	\$175.00
02/20/25	TND	Further preparation of information for January fee statement to ensure compliance with U.S. Trustee guidelines.	2.30	\$1,840.00
02/24/25	SJM	Revise Hilco engagement letter in light of change to 327 employment (.3); revise draft employment application and supporting papers (.3); email to A. Bardos regarding same (.2).	0.80	\$700.00

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02/24/25	TND	Further preparation of January fee statement to ensure compliance with U.S. Trustee guidelines (1.9); correspondence with S. Moses on potential Hilco 327 retention (.3).	2.20	\$1,760.00
02/25/25	TND	Email correspondence with C. Moore on January filing for A&M (.2); email to A. Uetz on January fee statement (.1).	0.30	\$240.00
02/26/25	JCH	Prepare draft of Foley's monthly fee statement for January 2025.	0.50	\$165.00
02/28/25	AMUE	Provide advice regarding Foley's monthly fee statement.	1.00	\$1,050.00
02/28/25	JCH	Finalize (.7) and file (.1) Foley monthly fee statement for January 2025.	0.80	\$264.00
02/28/25	SJM	Revise application for Hilco retention in light of filed Committee opposition (.2); email to client regarding same (.1); email to Hilco regarding next steps on employment (.4).	0.70	\$612.50
02/28/25	TND	Finalize Foley January fee statement for filing.	0.90	\$720.00
Task Total:			49.00	\$38,615.00

021 Retention/Fee Applications: Ordinary Course Professionals

02/03/25	TND	Call with Hilco counsel on engagement letter (.2); revise letter based on call (.3); correspondence with A. Uetz on same (.2).	0.70	\$560.00
02/04/25	AMUE	Finalize engagement letter with Hilco and communication with A. Bardos regarding same.	0.70	\$735.00
02/04/25	TND	Communications with Hilco on engagement letter revisions.	0.20	\$160.00
02/06/25	TND	Email communications with Hilco and RCBO teams on finalized engagement letter (.3); finalize documents for Hilco to execute for OCP retention (.3).	0.60	\$480.00
02/10/25	TND	Communications with Foley team on Hilco OCP retention (.2); review documents from Hilco (.1).	0.30	\$240.00

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02/12/25	AMUE	Review email received from B. Weisenberg regarding Hilco retention (.2) and follow up regarding same (.4); communication with A. Bardos and M. Kemner regarding same (.3).	0.90	\$945.00
02/12/25	JCH	Finalize (.4) and file (.1) Notice of Supplemental OCP Retention of Hilco Real Estate, LLC.	0.50	\$165.00
02/12/25	SJM	Analyze approach to Hilco retention in light of Committee position (.4); email to A. Uetz regarding same (.2).	0.60	\$525.00
02/12/25	TND	Finalize Hilco OCP retention paperwork (.3); correspondence with Foley team on Committee objection to same (.2).	0.50	\$400.00
02/20/25	TND	Email to A. Uetz and M. Lee on retention of additional OCP professional.	0.10	\$80.00
Task Total:			5.10	\$4,290.00

022 Retention/Fee Applications: Other Professionals

02/01/25	TND	Review Newsome Interim Fee Application (.2); correspondence with R. Newsome regarding same (.1).	0.30	\$240.00
02/10/25	TND	Review information from A. Fernandez regarding Gallagher application.	0.20	\$160.00
02/13/25	JCH	Email correspondence with T. Dolcourt regarding mediator fee applications to be filed.	0.50	\$165.00
02/13/25	TND	Revise Gallagher Group interim fee statement (1.3); finalize Newsome interim fee application (.2); communications with R. Newsome on same (.2); review Sontchi interim fee application (.2); communications with C. Syzmanski on same (.2).	2.10	\$1,680.00
02/14/25	JCH	Finalize (.5) and file (.3) 3 mediator fee applications; calendar response deadline and hearing on interim fee applications (.2).	1.00	\$330.00
02/14/25	SJM	Coordinate with Committee local counsel on notice of fee applications (.4); draft omnibus notice (.8).	1.20	\$1,050.00

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02/14/25	SJM	Email to client regarding payment of monthly fee statements (.4); email to client regarding payment of Committee member expenses (.3).	0.70	\$612.50
02/17/25	TND	Email to mediators and staff with their as-filed Interim Fee Applications and Notice of Hearing.	0.30	\$240.00
02/28/25	JCH	Prepare chart of interim payments due to all case professionals and email same to S. Moses.	0.50	\$165.00
Task Total:			6.80	\$4,642.50

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

02/04/25	EPK	Review Rule 2015.3 reporting requirements.	0.10	\$87.50
02/05/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding preparation of the third Rule 2015.3 report for CTN (.2); email correspondence with counsel for CTN, W. Smith of Binder & Malter, regarding draft of report for CTN's review and approval (.1).	0.30	\$262.50
02/07/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding the preliminary draft of the third CTN Rule 2015.3 report (.2); brief review of preliminary draft of CTN periodic report and exhibits (.2); email correspondence with W. Smith of Binder & Malter and D. Cassidy of Alston & Bird regarding review and approval of the next CTN report (.1).	0.50	\$437.50
02/10/25	EPK	Email correspondence with counsel for CTN, W. Smith of Binder & Malter, regarding comments to the third CTN Rule 2015.3 report.	0.10	\$87.50
02/11/25	EPK	Review updated and client-approved Rule 2015.3 report for CTN.	0.10	\$87.50
02/12/25	EPK	Review proposed filing version of the third CTN Rule 2015.3 report (.1); email correspondence with A. Bardos regarding same (.1).	0.20	\$175.00

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02/14/25	EPK	Final review of third CTN Rule 2015.3 report (.2); email correspondence with J. Harrison regarding preparation of same for filing on February 18, 2025 (.1); email correspondence with D. Cassidy of Alston & Bird to confirm approval of CTN report for filing (.1).	0.40	\$350.00
02/17/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding preliminary draft of the January 2025 MOR.	0.20	\$175.00
02/18/25	EPK	Oversee filing and service of the third CTN Rule 2015.3 report (.3); review the January 2025 MOR package prepared by VeraCruz (.3); provide feedback on same to A. Bardos of RCBO and D. Flanagan of VeraCruz (.2); follow-on email correspondence with D. Flanagan and RCBO team (.2).	1.00	\$875.00
02/20/25	EPK	Review proposed filing version of the January 2025 MOR (.2); email correspondence with A. Bardos regarding final approval of same for filing (.1).	0.30	\$262.50
02/21/25	EPK	Email correspondence with J. Harrison regarding filing and service of the January 2025 MOR.	0.20	\$175.00
02/21/25	JCH	File monthly operating report for January 2025.	0.20	\$66.00
Task Total:			3.60	\$3,041.00

026 Unsecured Creditor Issues/Communications/Meetings

02/04/25	AMUE	Prepare for (.4) and attend (.4) meeting with B. Weisenberg regarding mediation.	0.80	\$840.00
02/04/25	MDL	Evaluate potential stipulation on OPF voting status.	0.10	\$87.50
02/14/25	AMUE	Communications with B. Weisenberg regarding meet and confer on amended disclosure statement.	0.50	\$525.00
02/17/25	MCM	Email correspondence with Committee counsel regarding amended claims and potential stipulation as to claimant information and impact on solicitation (.3); analysis of same (.3).	0.60	\$555.00

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02/18/25	MDL	Telephone conference with Lowenstein (J. Prol, B. Weisenberg) regarding points of objection to draft disclosure statement.	0.90	\$787.50
02/21/25	AMUE	Meeting with B. Weisenberg regarding mediation.	0.30	\$315.00
Task Total:			3.20	\$3,110.00

027 Real Estate and Real Property Issues

02/11/25	SJM	Review edit to NDA.	0.20	\$175.00
02/11/25	TND	Review correspondence from real estate consultants including NDA matters.	0.30	\$240.00
02/12/25	TND	Review executed NDAs with real estate consultants.	0.20	\$160.00
Task Total:			0.70	\$575.00

028 Tort Claims

02/25/25	EPK	Assess co-defendant liabilities for abuse claims that have been asserted against RCBO's estate.	0.20	\$175.00
02/26/25	KAFA	Research regarding John Roe 415 (.5); meeting with J. Anton and K. Hunt regarding RCBO/Diocese of Oakland litigation files (.6).	1.10	\$495.00
Task Total:			1.30	\$670.00

031 Insurance Issues (coverage, includes adversary proceeding)

02/03/25	AMUE	Review multiple emails received from counsel for insurers regarding requests for information concerning proofs of claim (.5) and outline strategy to respond to same without breaching attorney-client privilege (1.0); finalize approval for production of documents concerning discovery in state court litigation involving one claimant (.6).	2.10	\$2,205.00
02/03/25	AMUE	Email to T. Gallagher and insurers regarding requests for information.	0.40	\$420.00

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02/03/25	EPM	Prepare for conference call regarding discovery status (.6); conference call with E. Ridley and M. Roberts regarding document review and discovery status (.6); draft correspondence to insurers regarding forthcoming document production (.6); review operative protective orders (.7); review status of previously executed confidentiality agreements (.6); email correspondence regarding previously-produced documents (.3).	3.40	\$2,856.00
02/03/25	EPM	Prepare for call regarding response to insurers' document requests (.8); conference call with A. Uetz, M. Moore, and E. Ridley regarding insurers' document and claims analysis requests (1.0).	1.80	\$1,512.00
02/03/25	ERR	Review issues related to funnel of claims analysis and production of materials regarding abuse case.	0.60	\$660.00
02/03/25	ERR	Review status of production.	0.70	\$770.00
02/03/25	KAFA	Analysis of prior client document collections/productions/discovery and clergy III collections/litigation/discovery to determine any additional potential documents to produce pursuant to insurers' document requests (3.3); call with E. Mazzocco regarding same (.3).	3.60	\$1,620.00
02/03/25	MCM	Email and telephone correspondence regarding insurer discovery requests on claim information (.6); analysis of claim funnel requests (.5).	1.10	\$1,017.50
02/03/25	MR	Attend discovery strategy call with E. Ridley and E. Mazzocco (.6); email and telephone communications with E. Mazzocco regarding discovery issues in relation to Judge Corley's January 16, 2025 Order (.3); coordinate production of documents to insurer defendants in insurance coverage action (.3); draft set of Requests for Production to CIGA in insurance coverage action (1.2).	2.40	\$1,908.00
02/04/25	AMUE	Revisions to proposed response to insurers regarding request for information concerning proofs of claim (.3); follow-up email exchange with T. Schiavoni (.2).	0.50	\$525.00

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02/04/25	EPM	Revise and serve requests for production to certain insurers (1.9); correspondence with Fidelidade counsel regarding document discovery and Fidelidade covered claims (.4).	2.30	\$1,932.00
02/04/25	ERR	Edit discovery requests to insurers and follow-up meet and confer with insurers regarding production.	1.50	\$1,650.00
02/04/25	ERR	Review communication regarding funnel of claims for insurers' request in discovery.	0.40	\$440.00
02/04/25	KAFA	Analysis of collected documents to identify potential documents for review and possible production in response to insurer document requests (.5); assist with preparation of abuse case discovery documents to produce to insurers (.3).	0.80	\$360.00
02/04/25	MCM	Analysis of claim information requests from insurer counsel (.6); prepare response and attachments for Foley team for review (.6); email correspondence with insurers and mediators regarding same (.3).	1.50	\$1,387.50
02/04/25	MR	Draft email communications to various insurer defendants in insurance coverage action regarding requests for meet and confer on document productions (.4); coordinate further production of documents in insurance coverage action (.4); revise set of Requests for Production to CIGA (.6).	1.40	\$1,113.00
02/05/25	AMUE	Review information from Foley team regarding outstanding insurance discovery matters in order to comply with Judge Corley's directive that written discovery be completed (1.2) and provide strategy direction to Foley team regarding same (.4).	1.60	\$1,680.00
02/05/25	EPM	Serve document production (.2); preparation for conference call with J. Breall regarding status of document discovery (.4).	0.60	\$504.00
02/05/25	ERR	Review status of discovery and questions served against insurers.	0.50	\$550.00

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02/05/25	KAFA	Analysis of collected documents to identify potential documents for review and possible production in response to insurer document requests (.5); finalization of production of abuse case discovery materials (.2); update document production log (.1); organize RCBO's discovery with the insurers (.3).	1.10	\$495.00
02/05/25	MCM	Follow up regarding request for claim information from certain insurers and related issues.	0.50	\$462.50
02/05/25	MR	Further email communications to insurer defendants in insurance coverage action regarding meet and confer requests (.2); revise, finalize and serve set of requests for production on CIGA (.3).	0.50	\$397.50
02/06/25	EPM	Emails with insurers regarding status of unredacted proof of claim productions.	0.60	\$504.00
02/06/25	ERR	Review follow-up to insurers regarding production.	0.50	\$550.00
02/06/25	KAFA	Analysis of proof of claim production and determine additional POC's to produce (1.0); download, analysis and organization of updated Survivor Claims register and newly filed late POC's received from KCC (.3); analysis of collected documents to identify potential documents for review and possible production in response to insurer document requests (1.2).	2.50	\$1,125.00
02/06/25	MCM	Email correspondence regarding follow-up insurer claim information requests (.3); email correspondence confirming execution of necessary documentation to receive unredacted proofs of claim (.3); work on issues in connection with reconciliation of claim productions to insurer parties (.6).	1.20	\$1,110.00
02/06/25	MR	Draft further communications to multiple insurer defendants regarding timing of outstanding insurer document productions and previous requests for meet and confer discussions.	0.40	\$318.00

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02/07/25	EPM	Analysis of protective orders governing various documents produced in bankruptcy, insurance, and JCCP 5108 proceedings (1.0); review depositions taken in underlying abuse case (1.6); conference call with J. Breall regarding status of document productions (.4).	3.00	\$2,520.00
02/07/25	ERR	Review status of discovery production.	0.40	\$440.00
02/07/25	MCM	Conference call with counsel for certain insurers regarding claims analysis and related issues (.5); email correspondence with certain insurers regarding insurance assignment language from other cases (.3); analysis of claims issues raised by insurers (.4).	1.20	\$1,110.00
02/07/25	MR	Attend telephone call with E. Mazzocco and J. Breall regarding status of and strategy for document productions from RCBO to insurer defendants and insurance coverage action.	0.40	\$318.00
02/08/25	ERR	Review status of discovery responses.	0.30	\$330.00
02/10/25	EPM	Analysis of outstanding proofs of claim to be produced (.4); analyze and summarize letter from Westport regarding discovery requests (1.1); conference call with M. Roberts regarding outstanding discovery tasks and strategy related thereto (1.1); draft summary of same for E. Ridley's review (.3).	2.90	\$2,436.00
02/10/25	ERR	Review status of meet and confer communications regarding insurer productions.	0.60	\$660.00
02/10/25	MR	Strategize with E. Mazzocco regarding identification of documents for potential production to insurer defendants in insurance coverage action, per Court's January 17, 2025 Order.	1.10	\$874.50
02/11/25	EPM	Attention to insurance document review staffing.	0.20	\$168.00
02/11/25	MR	Draft additional follow-up communications to counsel for insurers regarding meet and confer requests (.2); review documents to assess potential materials for production to insurer defendants in insurance coverage action (.9).	1.10	\$874.50
02/11/25	MRL	Confer with E. Mazzocco regarding reviewing certain documents.	0.20	\$135.00

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02/12/25	MCM	Email correspondence regarding insurer requests for information on claims analysis.	0.30	\$277.50
02/12/25	MR	Review additional documents to identify potentially responsive materials for production to insurers in insurance coverage action (1.0); draft summary of meet and confer correspondences with insurers' counsel (.3).	1.30	\$1,033.50
02/13/25	EPM	Conference call with M. Roberts regarding upcoming document review (.4); review M. Roberts' summary of documents to review in preparation for conference call (.1).	0.50	\$420.00
02/13/25	ERR	Edit brief in response to Committee brief on bad faith claims.	1.20	\$1,320.00
02/13/25	MR	Create plan for continuation of document review in insurance coverage action (.6); review documents for responsiveness to insurers' requests in relation to same (1.3).	1.90	\$1,510.50
02/13/25	MRL	Email correspondence with M. Roberts regarding reviewing insurance documents.	0.10	\$67.50
02/14/25	AMUE	Provide advice regarding open issues on discovery.	0.80	\$840.00
02/14/25	EPM	Discussions with M. Roberts regarding upcoming document review.	0.30	\$252.00
02/14/25	ERR	Review status of meet and confer communications with insurers.	0.50	\$550.00
02/14/25	MR	Additional follow-up email communications with counsel for insurers regarding meet and confer discussions related to document production (.3); attend call with M. Rofacil regarding review of documents for potential responsiveness to requests for production from insurers in insurance coverage action (.2); review transcript of January 16, 2025 hearing in insurance coverage action, in preparation for meet and confer calls with insurers' counsel (.2); prepare for and attend M&C call with counsel for U.S. Fire (.9); review documents for potential responsiveness to requests for production from insurers (.5).	2.10	\$1,669.50

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02/14/25	MRL	Confer with M. Roberts regarding reviewing documents to produce to the insurers (.3); analyze documents to make a production to the insurers (2.2).	2.50	\$1,687.50
02/17/25	AMUE	Review privileged summary of mediation meeting with insurers and mediators (.4) and follow-up communications with Foley team to prepare for mediation (.8); finalize client leadership strategy memorandum regarding same (.5).	1.70	\$1,785.00
02/17/25	EPM	Internal discussions regarding insurer document production.	0.40	\$336.00
02/18/25	EPM	Meet and confer call with CNA regarding discovery status (.8); preparation for same (.3); meet and confer call with Lloyd's regarding discovery status (.6).	1.70	\$1,428.00
02/18/25	MR	Prepare for meet and confer calls with counsel for CNA and Lloyd's in insurance coverage action by reviewing prior written discovery and summarizing outstanding disputes over document productions (1.5); attend meet and confer call with CNA (.8); M&C call with Lloyd's (.6).	2.90	\$2,305.50
02/19/25	EPM	Plan scope and strategy for upcoming document review (1.0); analyze draft agreement with captive insurer (.3).	1.30	\$1,092.00
02/20/25	EPM	Review repositories of documents to be considered for responsiveness and possible production (1.4); analysis of claims pertaining to Fidelidade (.2); analysis of proofs of claim to be included in supplemental document production (.8); conference call with M. Schachte regarding same (.2); review policy limits demand letters to various insurers (.2).	2.80	\$2,352.00
02/20/25	MCM	Analyze issues regarding information requests from insurers as to proofs of claim.	0.50	\$462.50
02/20/25	MR	Prepare for meet and confer call with counsel for Travelers in insurance coverage action by reviewing prior written discovery and summarizing outstanding disputes over document productions (.6); attend meet and confer call with Travelers (.5).	1.10	\$874.50

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March 27, 2025

02/21/25	EPM	Review summary of document collection (.9); conference with M. Roberts regarding document review (.6); review letter from Westport regarding document requests (.5); meet and confer call with Westport regarding document requests (.5); strategize with E. Ridley regarding policy limits demand letters (.2); emails with case team regarding same (.3); draft summary of strategy for document review (.5).	3.50	\$2,940.00
02/21/25	ERR	Review policy limit demands from individual claimant and review response thereto.	1.00	\$1,100.00
02/21/25	MCM	Analyze issues regarding information requests from insurers as to proofs of claim.	0.50	\$462.50
02/21/25	MR	Communicate with E. Mazzocco regarding continued strategy for identifying materials responsive to requests for production from insurers in insurance coverage action (.6); perform high-level review of document production received from Westport (.4); prepare for meet and confer call with counsel for Westport in insurance coverage action by reviewing prior written discovery and summarizing outstanding disputes over document productions (.5); attend meet and confer call with Westport (.7).	2.20	\$1,749.00
02/22/25	MR	Draft summary of meet and confer calls with insurers to date in insurance coverage action.	0.40	\$318.00
02/23/25	EPM	Review documents for responsiveness and possible production.	1.70	\$1,428.00
02/24/25	EPM	Review documents for relevance and possible production (2.3); draft summary of discovery status (1.5); analysis of policy limits demand letters (.5); discussions regarding proof of claim productions (.2).	4.50	\$3,780.00
02/24/25	ERR	Review policy information request.	0.50	\$550.00
02/24/25	MR	Communicate with counsel for Travelers regarding document production received from Travelers.	0.10	\$79.50
02/24/25	MRL	Analyze documents to make a production to the insurers.	0.90	\$607.50

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02/25/25	EPM	Conference call with M. Roberts regarding document discovery (.4); finalize and serve proof of claim productions, including internal discussions regarding same (1.1).	1.50	\$1,260.00
02/25/25	JRBL	Communications with E. Ridley regarding Ordinary Mutual coverage years and limitations.	0.50	\$687.50
02/25/25	KAFA	Analysis of Ordinary Mutual coverage and involvement in the state court actions (.3); coordinate production of proofs of claim to be served on counsel for American Home Assurance Company (.5).	0.80	\$360.00
02/25/25	MR	Review documents for responsiveness to requests for production served on RCBO by insurers in insurance coverage action (1.3); communicate with E. Mazzocco regarding same and regarding strategy for identifying additional potentially responsive documents (.4).	1.70	\$1,351.50
02/26/25	EPM	Quality control review of documents for relevance and privilege (.3); draft summary of discovery status (1.3).	1.60	\$1,344.00
02/26/25	ERR	Telephone call with Mark Plevin regarding mediation and upcoming hearing.	0.50	\$550.00
02/26/25	MR	Review additional documents for responsiveness to requests for production served by insurers in insurance coverage action (4.1); communicate with E. Mazzocco regarding status of and strategy for document review and regarding joint status update ordered by Judge Corley for March 3, 2025 submission (.4).	4.50	\$3,577.50
02/27/25	EPK	Brief analysis of shared insurance issues relating to RCWC.	0.10	\$87.50
02/27/25	EPM	Conference call with E. Ridley regarding insurance tasks (.3); correspondence with insurance counsel regarding discovery matters (.2); quality control review of documents for responsiveness and privilege (.4); draft status update to Judge Corley regarding insurance coverage action discovery (4.2).	5.10	\$4,284.00
02/27/25	ERR	Review case status and strategy.	0.50	\$550.00

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March 27, 2025

02/27/25	ERR	Telephone call with J. Breall regarding American Home request for information and materials.	0.40	\$440.00
02/27/25	ERR	Edit letter to U.S. Fire regarding claim of no policy.	0.60	\$660.00
02/27/25	ERR	Review status of insurance claims and production.	0.50	\$550.00
02/27/25	KAFA	Analysis of additional client documents and discovery to determine any additional potential documents to produce pursuant to insurers' document requests (1.1); calls with M. Roberts and E. Mazzocco to discuss prior productions and review of remaining client documents (.4); research Clergy III protective order (.4).	1.90	\$855.00
02/27/25	MR	Communicate with E. Mazzocco regarding status of document review and draft of March 3, 2025 joint status report ordered by Judge Corley (.5); draft portions of status report (1.1); review additional documents for responsiveness to requests for production served by insurers in insurance coverage action (3.3).	4.90	\$3,895.50
02/28/25	EPM	Quality control review of documents slated for production (2.8); revise joint status update regarding discovery in coverage action (.5); internal discussions regarding document production logistics (.5); coordinate with J. Breall regarding document productions (.3); respond to insurers regarding policy limits demand letters (.2).	4.30	\$3,612.00
02/28/25	ERR	Edit joint statement of case status.	0.80	\$880.00
02/28/25	ERR	Review status of diocese production and response of policy limit information request.	0.80	\$880.00
02/28/25	KAFA	Prepare documents for production to insurers (1.3); updates to document production log (.4); call with E. Mazzocco regarding insurer productions and executed confidentiality agreements (.3).; communications with M. Schachte about document productions (.5).	2.50	\$1,125.00

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March 27, 2025

02/28/25	SJM	Review update on bankruptcy case status for filing with District Court (.2); email to E. Mazzocco regarding comments to same (.1).	0.30	\$262.50
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Task Total:	118.90	\$98,428.00
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032 Rule 2004 Motions/Discovery/Subpoenas

02/11/25	MDL	Email correspondence with VeraCruz and A. Bardos regarding BRG financial information requests.	0.30	\$262.50
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02/11/25	MDL	Telephone conference with M. Roberts to discuss BRG financial information requests.	0.20	\$175.00
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02/11/25	MR	Communicate with M. Lee (.2) and A. Uetz (.2) to evaluate requests from BRG to VeraCruz regarding RCBO's financial statements.	0.40	\$318.00
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02/12/25	MDL	Correspondence with B. Weisenberg (Lowenstein) regarding BRG financial information requests.	0.30	\$262.50
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02/18/25	JMT	Confer with M. Moore regarding necessary discovery (.4); confer with M. Mitchem and analyze potential discovery requests (.7).	1.10	\$962.50
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02/21/25	JCH	Prepare information related to Policy Limit Requests received from individual plaintiffs.	0.50	\$165.00
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02/21/25	MDL	Email exchange with J. Bair (Burns Bair) regarding previously-produced documents.	0.10	\$87.50
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02/23/25	JMT	Edit discovery requests (.4) and 2004 motion (.7); confer with team regarding same (.4).	1.50	\$1,312.50
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02/24/25	JCH	Create file of emails related to Policy Limit Requests received from individual plaintiffs (.2); create spreadsheet tracking policy limit requests received (.5).	0.70	\$231.00
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02/27/25	EPK	Email correspondence with D. Flanagan of VeraCruz and K. Farrar regarding January 2025 MOR supplements to be sent to the BRG team.	0.20	\$175.00
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02/27/25	JMT	Confer with team regarding discovery strategy (.6); revise discovery requests (1.1).	1.70	\$1,487.50
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02/27/25	KAFA	Work on production of additional MOR supplemental documents to BRG.	0.20	\$90.00
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Foley & Lardner LLP

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02/27/25	MCM	Attention to discovery issues regarding the Committee (.3); meeting with M. Thomas regarding same (.3).	0.60	\$555.00
02/27/25	MDL	Strategize regarding pre-confirmation discovery.	0.20	\$175.00
02/28/25	JCH	Prepare file of cover emails with RCBO's response to Westport's request for information for its individual plaintiffs (.3) and update tracking spreadsheet regarding same (.2).	0.50	\$165.00
02/28/25	JMT	Revise discovery requests to Committee on multiple issues.	1.40	\$1,225.00
02/28/25	KAFA	Prepare JCCP 5108 deposition notices for bankruptcy team review.	0.20	\$90.00
02/28/25	MCM	Revise discovery requests to Committee regarding various issues (.5); confer with M. Thomas regarding same (.4).	0.90	\$832.50

Task Total: 11.00 \$8,571.50

034 Other Motion Practice

02/23/25	MDL	Revise motion for settlement with R. Galindo and supporting documents.	0.60	\$525.00
02/24/25	EPK	Review update from S. Moses regarding the Committee's reservation of rights relating to pending motion to extend removal deadline (.1); email correspondence with S. Moses regarding same (.1).	0.20	\$175.00
02/24/25	SJM	Analyze Committee response to motion to extend removal deadline (.4); email to Foley team regarding approach in light of same (.3).	0.70	\$612.50

Task Total: 1.50 \$1,312.50

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Foley & Lardner LLP

March 27, 2025

038 Mediation

02/03/25	MDL	Telephone conference with S. Warren (O'Melveny) regarding potential compromises on plan and disclosure statement language.	0.40	\$350.00
02/04/25	AMUE	Email communication to three mediators regarding mediation (.3) and follow-up communication with Judge Sontchi (.2) and Judge Newsome (.4).	0.90	\$945.00
02/04/25	EPM	Draft summary of outreach from insurers regarding claims analysis.	0.90	\$756.00
02/04/25	MCM	Email correspondence regarding mediation issues for mediation scheduled on 2/24-25.	0.40	\$370.00
02/04/25	MDL	Evaluate information to be shared with insurers in advance of mediation.	0.20	\$175.00
02/06/25	EPM	Internal email discussions regarding insurer requests for claims analysis.	0.50	\$420.00
02/07/25	EPM	Call with CNA counsel regarding claims analysis.	0.50	\$420.00
02/10/25	AMUE	Email communication with mediators regarding mediation with insurers (.3); review response received from Judge Newsome (.2); telephone call with T. Gallagher (.3); meeting with Judge Sontchi, M. Moore and M. Lee (.7); develop strategy notes for mediation (1.1).	2.60	\$2,730.00
02/10/25	MCM	Conference call with Judge Sontchi regarding resumption of mediation, discussion with the Committee, and other mediation issues.	0.60	\$555.00
02/10/25	MDL	Strategize for February mediation with A. Uetz.	0.20	\$175.00
02/10/25	MDL	Evaluate confidential mediation issue to be discussed with insurers.	0.30	\$262.50
02/10/25	MDL	Telephone conference with C. Sontchi regarding preparation for mediation.	0.70	\$612.50
02/10/25	MDL	Strategize regarding approach to mediation and confidential mediation issues.	1.90	\$1,662.50
02/12/25	EPM	Attend confidential mediation session.	1.50	\$1,260.00
02/12/25	ERR	Analyze mediation strategy.	0.50	\$550.00

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Foley & Lardner LLP

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02/12/25	ERR	Attend pre-mediation meeting with T. Gallagher and Judge Newsome.	0.80	\$880.00
02/12/25	MDL	Participate in mediation session with insurers, Judge Newsome, and T. Gallagher.	1.50	\$1,312.50
02/12/25	MDL	Draft summary of confidential mediation issue.	0.10	\$87.50
02/13/25	EPM	Review notes regarding February 12, 2025 mediation session (.5); draft summary of same for case team review (.6).	1.10	\$924.00
02/14/25	EPM	Review confidential mediation materials.	1.50	\$1,260.00
02/17/25	EPM	Draft summary of confidential mediation session.	0.30	\$252.00
02/19/25	MDL	Strategize for joint mediation session.	0.70	\$612.50
02/20/25	AMUE	Meeting with M. Lee regarding mediation matter (.7); prepare for mediation (1.0).	1.70	\$1,785.00
02/20/25	MDL	Strategize with A. Uetz regarding mediation strategy.	0.70	\$612.50
02/21/25	AMUE	Prepare for mediation by review of information concerning privileged issue related to real estate (1.1); communication with mediators regarding mediation (.2).	1.30	\$1,365.00
02/23/25	AMUE	Prepare for global mediation.	1.80	\$1,890.00
02/24/25	AMUE	Prepare for mediation (1.9); appearance at global mediation (8.4); debrief meeting with M. Lee and R. Manns (1.0).	11.30	\$11,865.00
02/24/25	ERR	Attend Day #1 mediation with Committee, insurers and Debtor (partial).	5.00	\$5,500.00
02/24/25	MCM	Email correspondence regarding mediation issues with Foley team.	0.50	\$462.50
02/24/25	MDL	Participate in mediation session with Committee and insurers.	8.40	\$7,350.00
02/24/25	SJM	Attend (for part) mediation with Committee and insurers.	5.60	\$4,900.00
02/25/25	AMUE	Appearance at mediation (8.0); draft proposed stipulation adjourning dates for 30 days in light of mediation (1.0).	9.00	\$9,450.00

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Foley & Lardner LLP

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02/25/25	EPM	Review coverage parameters for certain insurance policies for use in confidential mediation discussions.	0.80	\$672.00
02/25/25	ERR	Attend Day #2 of global mediation.	8.00	\$8,800.00
02/25/25	MCM	Email correspondence with Foley team regarding mediation and related issues (.4); debrief with M. Lee regarding same and status of discussions (.5); respond to requests for information from mediation parties (.5).	1.40	\$1,295.00
02/25/25	MDL	Participate in mediation session on behalf of Debtor (partial).	7.30	\$6,387.50
02/25/25	SJM	Participate in mediation with Committee and insurers (partial).	1.20	\$1,050.00
02/26/25	AMUE	Meeting with mediators to debrief following mediation (.8); email communication with client leadership regarding mediation (.5).	1.30	\$1,365.00
02/26/25	EPM	Draft letter to insurer regarding confidential mediation subjects.	1.90	\$1,596.00
02/26/25	ERR	Telephone call with mediators regarding status of settlement discussions (partial).	0.50	\$550.00
02/26/25	SJM	Respond to A. Uetz regarding privileged mediation matter.	0.30	\$262.50
02/27/25	EPM	Continue drafting letter to insurer regarding confidential mediation matters.	1.50	\$1,260.00
02/28/25	AMUE	Meeting with mediators regarding status of mediation proposal.	0.80	\$840.00
02/28/25	ERR	Attend virtual meeting with mediators regarding status of settlements (partial).	0.60	\$660.00
Task Total:			89.00	\$86,490.00
Services Total:			754.30	\$637,824.00

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Joseph S. Harper	JSH	Associate	6.20	\$800.00	\$4,960.00
Mason Roberts	MR	Associate	30.80	\$795.00	\$24,486.00
Mary Rofaail	MRL	Associate	12.10	\$675.00	\$8,167.50
Mikaela R. Mitcham	MRM	Associate	33.50	\$675.00	\$22,612.50
Nora McGuffey	NMCG	Associate	14.80	\$700.00	\$10,360.00
Shane J. Moses	SJM	Of Counsel	108.30	\$875.00	\$94,762.50
Janelle C. Harrison	JCH	Paralegal	30.80	\$330.00	\$10,164.00
Kerry A. Farrar	KAFA	Paralegal	48.50	\$450.00	\$21,825.00
Ann Marie Uetz	AMUE	Partner	121.20	\$1,050.00	\$127,260.00
Emil P. Khatchatourian	EPK	Partner	36.70	\$875.00	\$32,112.50
Eileen R. Ridley	ERR	Partner	30.40	\$1,100.00	\$33,440.00
Geoffrey S. Goodman	GSG	Partner	21.20	\$1,050.00	\$22,260.00
Jonathan Michael Thomas	JMT	Partner	5.70	\$875.00	\$4,987.50
Jeff R. Blease	JRBL	Partner	0.50	\$1,375.00	\$687.50
Mark C. Moore	MCM	Partner	51.20	\$925.00	\$47,360.00
Matthew D. Lee	MDL	Partner	63.40	\$875.00	\$55,475.00
Thomas F. Carlucci	TFCA	Partner	2.00	\$1,375.00	\$2,750.00
Alan R. Ouellette	AROU	Senior Counsel	16.80	\$875.00	\$14,700.00
Elizabeth P. Mazzocco	EPM	Senior Counsel	80.10	\$840.00	\$67,284.00
Matthew S. Kiel	MSK	Senior Counsel	1.20	\$875.00	\$1,050.00
Tamar N. Dolcourt	TND	Special Counsel	38.90	\$800.00	\$31,120.00
Totals			754.30		\$637,824.00

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$439.36
LSS - eDiscovery Services	\$3,800.00
Meals	\$3,045.73
Expenses Incurred Total	\$7,285.09

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.

Expense Detail

Electronic Legal Research Services

Date	Initials	Description	Amount
02/28/25	SJM	Docket Report. Image1771-0. Westlaw.	\$439.36

LSS - eDiscovery Services

Date	Initials	Description	Amount
02/28/25	JRBL	LSS - eDiscovery Services.	\$3,800.00

Meals

Date	Initials	Description	Amount
02/20/25	ASD	VENDOR: U.S. BANK - 02/24/25 Lunch for RCBO mediation for parties and mediators (38 attendees).	\$673.76
02/21/25	ASD	VENDOR: U.S. BANK - 02/25/25 Lunch for RCBO mediation for parties and mediators (38 attendees).	\$673.76
02/24/25	ASD	VENDOR: U.S. BANK - 02/24/25 Breakfast for RCBO mediation for parties and mediators (38 attendees).	\$762.75
02/24/25	ASD	VENDOR: U.S. BANK - 02/24/25 Additional lunch for RCBO mediation for parties and mediators (38 attendees).	\$77.94
02/24/25	ASD	VENDOR: U.S. BANK - 02/25/25 Additional lunch for RCBO mediation for parties and mediators (38 attendees).	\$82.83
02/25/25	ASD	VENDOR: U.S. BANK - 02/25/25 Additional breakfast order for RCBO mediation for parties and mediators (38 attendees).	\$11.94
02/25/25	ASD	VENDOR: U.S. BANK - 02/25/25 Breakfast for RCBO mediation for parties and mediators (38 attendees).	\$762.75
			<hr/> \$3,045.73

Expense Total:

\$7,285.09



FOLEY & LARDNER LLP
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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

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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Amount Due:	\$439,981.83
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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 this invoice.

Federal Employer Number:
39-0473800

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

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Foley & Lardner LLP

April 30, 2025

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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Foley & Lardner LLP

April 30, 2025

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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Foley & Lardner LLP

April 30, 2025

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
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03/31/25	TND	Gather information on increasing professional fee costs for hearing.	0.40	\$320.00
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Task Total:	4.70	\$3,359.00
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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
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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
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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
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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
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03/21/25	JCH	File February monthly operating report and circulate filed copy of same.	0.50	\$165.00
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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
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03/31/25	MDL	Evaluate documents to be produced in connection with February 2025 monthly operating report.	0.10	\$87.50
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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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Foley & Lardner LLP

April 30, 2025

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

Services Total: 545.10 \$435,530.50

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 Rofaail	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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April 30, 2025

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
Totals			545.10		\$435,530.50

Expenses Incurred

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

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.

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:	\$4,451.33
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FOLEY & LARDNER LLP
111 HUNTINGTON AVENUE
SUITE 2600
BOSTON, MASSACHUSETTS 02199-7610
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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: May 29, 2025
Invoice No.: 51074874
Our Ref. No.: 100845-0402

Services through April 30, 2025

Amount due for professional services rendered regarding
Chapter 11 Bankruptcy \$698,272.00

Total Expenses: \$4,511.90

Amount Due: \$702,783.90

Please reference your invoice number 51074874 with your remittance
payable to Foley & Lardner LLP. Payment is due promptly upon receipt
of this invoice.

Federal Employer Number:
39-0473800

ROMAN CATHOLIC BISHOP OF OAKLAND

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Professional Services Detail**004 Bankruptcy Litigation/Adversary Proceedings**

04/01/25	JSH	Communications with team regarding 9019 motion papers for Bennett Trust settlement.	0.10	\$80.00
04/02/25	SJM	Finalize motion to approve settlement with Bennett Trust.	1.60	\$1,400.00
04/03/25	GSG	Telephone conference with team on various Committee issues.	0.50	\$525.00
04/03/25	MDL	Strategize with G. Goodman regarding property of the estate stipulation.	0.40	\$350.00
04/04/25	MCM	Analyze email correspondence summarizing order dismissing church/OPF adversary proceeding and related issues on next steps.	0.40	\$370.00
04/04/25	SJM	Review alter ego case law in order to evaluate ability of Committee to re-plead substantive consolidation claims.	1.20	\$1,050.00
04/04/25	SJM	Analyze decision dismissing adversary proceeding against Debtor, OPF, and churches (.7); draft email to team regarding basis for dismissal and implications of same (.5).	1.20	\$1,050.00
04/07/25	SJM	Respond to Committee counsel regarding Bennett Trust settlement motion.	0.30	\$262.50
04/08/25	AMUE	Review privileged information regarding pending adversary proceeding.	0.50	\$525.00
04/09/25	GSG	Correspondence with B. Weisenberg regarding property of the estate stipulation (.2); review Committee discovery letter (.2).	0.40	\$420.00
04/09/25	SJM	Respond to emails regarding approach to 4/23 status conference (.4); analyze potential response to letter from Committee regarding discovery in adversary proceeding (.5).	0.90	\$787.50
04/10/25	SJM	Call with R. Manns regarding dismissal order and Committee proposal to begin discovery.	0.40	\$350.00
04/10/25	SJM	Draft letter to M. Kaplan responding to request to take discovery in adversary proceedings.	1.10	\$962.50

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Foley & Lardner LLP

May 29, 2025

04/11/25	SJM	Finalize and send letter to M. Kaplan regarding discovery in adversary proceedings.	0.20	\$175.00
04/14/25	EPK	Review letter from Lowenstein regarding discovery in the pending adversary proceeding.	0.10	\$87.50
04/16/25	SJM	Email to A. Uetz regarding Committee response on discovery in adversary proceedings.	0.30	\$262.50
04/17/25	JSH	Communications with team regarding 9019 motion papers for Bennett Trust settlement.	0.20	\$160.00
04/21/25	GSG	Correspondence with team regarding adversary opinion.	0.20	\$210.00
04/21/25	SJM	Emails with case team regarding preparation for 4/23 hearing (.6); review past filings regarding restricted assets and related information in preparation for meetings regarding same (.8).	1.40	\$1,225.00
04/23/25	SJM	Call with R. Manns regarding status hearing on adversary proceeding (.3); prepare for status hearing on adversary proceeding (.9).	1.20	\$1,050.00
04/28/25	TFCA	Work on scheduling deposition prep sessions.	0.20	\$275.00
04/30/25	JSH	Communications with client regarding Bennett Trust settlement and use of funds (.2); communications with state court counsel regarding the same (.1).	0.30	\$240.00
04/30/25	MDL	Analyze draft amended complaint in OPF adversary proceeding.	0.30	\$262.50
04/30/25	MDL	Email exchange with C. Restel (Lowenstein) regarding redactions to draft amended complaint in OPF adversary proceeding.	0.10	\$87.50
04/30/25	MRL	Analyze the Committee's amended complaint regarding OPF.	0.20	\$135.00
04/30/25	NMCG	Analyze the amended complaint filed by Committee counsel.	0.30	\$210.00
04/30/25	SJM	Analyze Committee-amended complaint asserting restricted cash issues (.8); email to case team regarding same (.4).	1.20	\$1,050.00
Task Total:			15.20	\$13,562.50

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Foley & Lardner LLP

May 29, 2025

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

04/02/25	MRL	Analyze the motion to file a late proof of claim (.2); draft email to M. Moore regarding the motion (.2).	0.40	\$270.00
04/15/25	EPK	Email correspondence with J. Hogan regarding next steps for Judge Hogan's analysis of tort claims and related confidentiality agreement.	0.20	\$175.00
04/15/25	MCM	Email correspondence with Unknown Claims Representative and related parties regarding execution of confidentiality agreement and access to claim information (.3); coordinate execution of confidentiality agreement and production of claims by relevant parties (.3); email correspondence with litigation support regarding same (.2).	0.80	\$740.00
04/16/25	MCM	Compile fully executed confidentiality agreement for Unknown Claims Representative to receive access to proofs of claim (.3); coordinate production of same with litigation support (.4).	0.70	\$647.50
04/16/25	MDL	Evaluate duplicate Class 4 claim issue.	0.20	\$175.00
04/17/25	AMUE	Provide approval to M. Moore regarding recommendation on late-filed claim.	0.40	\$420.00
04/17/25	MCM	Analyze motion to allow late-filed claim filed by Zalkin firm (.5); conference call with counsel at Zalkin firm regarding same (.3); email correspondence with Foley team including recommendation and background facts (.4); analysis of potential objection (.3); analysis of voting issue with three duplicate claims (.4); email and telephone correspondence with counsel to Committee regarding same and proposed resolution (.3).	2.20	\$2,035.00
04/17/25	MDL	Strategize approach on possible duplicative Class 4 claims.	0.70	\$612.50
04/17/25	MRL	Review email correspondence from the Foley team regarding the motion to allow late-filed claim.	0.20	\$135.00

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04/21/25	MCM	Email correspondence with Foley team regarding motion to allow late-filed claim and strategy for same (.3); email correspondence with claims and noticing agent regarding filing of late claim in connection with preparation of objection to motion (.3).	0.60	\$555.00
04/21/25	MCM	Review email correspondence regarding settled claim filed in RCBO bankruptcy case and respond to same with settlement agreement.	0.40	\$370.00
04/21/25	NMCG	Prepare the opposition in response to claimant's motion to allow late-filed claim (3.4); discuss with M. Moore regarding the same (.3).	3.70	\$2,590.00
04/22/25	AMUE	Provide advice regarding objection to late-filed claim.	0.30	\$315.00
04/22/25	MCM	Revise draft objection to the motion to allow late-filed claim set for hearing on April 30, 2025 and circulate same to client parties for review (1.0); analyze Committee statement in support of motion (.4).	1.40	\$1,295.00
04/22/25	NMCG	Revise reply in opposition to motion to allow late claim to conform with comments received by M. Moore.	0.30	\$210.00
04/22/25	SJM	Email to M. Moore regarding Committee statement on late-filed claims motion.	0.30	\$262.50
04/23/25	MCM	Email correspondence with claims and noticing agent regarding late-filed claim (.3); finalize and approve objection to motion allowing same (.3).	0.60	\$555.00
04/23/25	NMCG	Revise the reply in opposition to motion to file late claim (.2); correspond with claims agent regarding status of late-filed claims (.1).	0.30	\$210.00
04/30/25	MDL	Evaluate Class 6 claims with S. Moses.	0.30	\$262.50
Task Total:			14.00	\$11,835.00

006 Case Administration (docket updates, WIP, and calendar)

04/01/25	JCH	Update daily docket report.	0.50	\$165.00
04/02/25	EPK	Assess RCBO's updated Bankruptcy Code deadlines as extended by most recent court orders.	0.20	\$175.00

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04/02/25	JCH	Finalize (.4) and file (.1) 9019 motion, A. Bardos declaration and notice of hearing; update daily docket report (.5).	1.00	\$330.00
04/03/25	JCH	Update daily docket report.	0.50	\$165.00
04/04/25	JCH	Calendar response deadlines and hearing on motion to approve settlement (.3); calendar extended deadlines related to orders entered (.4); update daily docket report (.5).	1.20	\$396.00
04/07/25	JCH	Update Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$330.00
04/07/25	JSJ	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.50	\$400.00
04/08/25	JCH	Update daily docket report.	0.20	\$66.00
04/09/25	JCH	Update daily docket report.	0.50	\$165.00
04/10/25	JCH	Update daily docket report.	0.20	\$66.00
04/11/25	JCH	Finalize (.3) and file (.1) supplemental OCP retention notice, and calendar related response deadline (.1); file omnibus certificate of no objection to monthly fee statements (.5); update daily docket report (.5).	1.50	\$495.00
04/14/25	JCH	Update Timeline and Master Case Calendar and send to J. Harper for review (.5); update daily docket report(.5).	1.00	\$330.00
04/14/25	JSJ	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.20	\$160.00
04/15/25	EPK	Review updated master case calendar and key dates timeline, including review of modified Bankruptcy Code reporting deadlines and plan-confirmation dates.	0.20	\$175.00
04/15/25	JCH	Circulate updated Timeline and Master Case Calendar to Foley team (.2); update daily docket report (.5).	0.70	\$231.00
04/16/25	JCH	Update Master Case Calendar through end of year (.8); calendar deadlines through end of year (.5); update daily docket report (.5).	1.80	\$594.00
04/17/25	AAWT	Confer with assigning attorney about document review assignment and next steps.	0.10	\$52.50

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Foley & Lardner LLP

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04/17/25	JCH	Emails to A. Uetz sending hearing transcripts (.5); update daily docket report(.5).	1.00	\$330.00
04/18/25	JCH	Prepare certificate of no objection to Motion to Approve Galindo Settlement (.5); file limited objection to Stout retention application (.2); update daily docket report (.5).	1.20	\$396.00
04/21/25	EPK	Supervisory oversight of certain master case calendar updates, including critical dates and deadlines relating to pending adversary proceedings.	0.20	\$175.00
04/21/25	JCH	File certificate of no objection to Galindo settlement motion and upload proposed order (.5); circulate updated Timeline and Master Case Calendar (.2); update daily docket report (.5).	1.20	\$396.00
04/21/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.20	\$160.00
04/21/25	MRL	Confer with M. Moore regarding creating a calendar for confirmation process (.2); begin reviewing documents to draft a calendar of the confirmation process for the Foley team (.5).	0.70	\$472.50
04/22/25	JCH	Update daily docket report.	0.50	\$165.00
04/22/25	MDL	Analyze docket to determine list of issues up for review on 4/23 or 4/30.	0.20	\$175.00
04/22/25	MRL	Continue reviewing documents to draft a calendar of the confirmation process for the Foley team.	0.70	\$472.50
04/23/25	JCH	Finalize (.6) and file (.2) motion to amend interim compensation procedures order and A. Bardos declaration; prepare notice of hearing on motion to amend (.5); file response in opposition to motion to allow late-filed claim (.2); calendar upcoming status conferences (.5); update daily docket report (.5).	2.50	\$825.00
04/23/25	MRL	Finalize reviewing documents to draft a calendar of the confirmation process for the Foley team.	0.40	\$270.00
04/24/25	JCH	Update daily docket report.	0.50	\$165.00
04/25/25	JCH	Revise exhibit references in motion to quash (.5); finalize (.4) and file (.1) motion to quash and for protective order; update daily docket report (.5).	1.50	\$495.00

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Foley & Lardner LLP

May 29, 2025

04/28/25	EPK	Review email and attached letter from T. Karcher of Proskauer regarding BRG security incident.	0.10	\$87.50
04/28/25	JCH	Update Timeline and Master Case Calendar (.5); update daily docket report (.5).	1.00	\$330.00
04/28/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.30	\$240.00
04/28/25	MCM	Analyze case calendaring issues in connection with confirmation and related pre-confirmation matters.	0.40	\$370.00
04/28/25	MRL	Continue reviewing documents to draft a calendar of the confirmation process for the Foley team to conform to M. Lee's schedule.	0.80	\$540.00
04/29/25	EPK	Review updated master case calendar and adjusted Bankruptcy Code deadlines (.1); review internal issues list for document productions (.1).	0.20	\$175.00
04/29/25	JCH	Update daily docket report.	0.50	\$165.00
04/29/25	JCH	Prepare (.4) and file (.1) pro hac vice application for M. Thomas and upload proposed order.	0.50	\$165.00
04/29/25	MRL	Continue drafting of the confirmation process for the Foley team.	1.20	\$810.00
04/29/25	SJM	Review pro hac application and proposed order for M. Thomas.	0.20	\$175.00
04/30/25	JCH	Update daily docket report.	0.50	\$165.00
04/30/25	MRL	Continue drafting a calendar of the confirmation process for the Foley team to conform to A. Uetz's comments.	1.10	\$742.50
Task Total:			28.90	\$12,757.50

007 Chapter 11 Plan/ Plan Confirmation

04/03/25	MCM	Email correspondence with Committee counsel regarding scheduling order and related matters on confirmation.	0.40	\$370.00
04/04/25	JCH	Calendar deadlines related to plan confirmation.	0.50	\$165.00

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Foley & Lardner LLP

May 29, 2025

04/07/25	AMUE	Begin to outline discovery necessary for contested plan confirmation trial (1.6); meeting with M. Lee to outline discovery and confirmation trial planning (1.9).	3.50	\$3,675.00
04/07/25	JCH	Analyze deadlines related to plan confirmation.	0.50	\$165.00
04/07/25	MDL	Strategize with A. Uetz regarding pre-confirmation planning.	1.90	\$1,662.50
04/07/25	NMCG	Research issues involving plan confirmation.	1.20	\$840.00
04/10/25	MCM	Analyze solicitation issues raised by claims and noticing agent (.4); email correspondence with counsel for Committee regarding same (.3); follow up on final documents and email addresses to facilitate solicitation (.5).	1.20	\$1,110.00
04/11/25	SJM	Revise Debtor's written discovery requests to Committee.	1.10	\$962.50
04/11/25	SJM	Email to R. Manns regarding plan conference schedule.	0.20	\$175.00
04/14/25	AMUE	Meeting with M. Lee, M. Moore and T. Dolcourt regarding plan confirmation issues.	0.90	\$945.00
04/14/25	MCM	Strategy call with Foley team regarding plan confirmation and related issues in connection with hearing preparation (partial) (.6); email correspondence regarding same (.2).	0.80	\$740.00
04/14/25	MCM	Prepare for (.1) and participate in (.9) conference call with Foley litigation team regarding discovery plan and related issues.	1.00	\$925.00
04/14/25	MDL	Strategize with A. Uetz and M. Moore regarding pre-confirmation strategy (.9); follow up on same (.5).	1.40	\$1,225.00
04/14/25	TND	Call with M. Lee, M. Moore, and A. Uetz on various privileged matters (partial) regarding confirmation (.7); email to J. Harrison on research issue (.1).	0.80	\$640.00
04/15/25	JCH	Calendar numerous deadlines related to plan confirmation.	0.80	\$264.00
04/16/25	AMUE	Provide advice to Foley team necessary to respond to creditor inquiries regarding plan.	0.40	\$420.00

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Foley & Lardner LLP

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04/16/25	MCM	Work on issues in connection with potential expert witness in contested confirmation.	0.60	\$555.00
04/17/25	MCM	Analysis of confirmation issues and witness testimony in advance of disclosures of fact and expert witnesses.	0.50	\$462.50
04/17/25	MRL	Analyze the Committee's objections to the disclosure statement regarding the plan (.3); email correspondence with M. Lee regarding the same (.1).	0.40	\$270.00
04/18/25	MCM	Analyze expert witness issues in connection with confirmation of third amended plan of reorganization.	0.70	\$647.50
04/18/25	MRL	Email correspondence with D. Martin regarding expert witness for plan confirmation.	0.30	\$202.50
04/20/25	MRL	Email correspondence with D. Martin regarding expert witness for plan confirmation.	0.20	\$135.00
04/21/25	AMUE	Analyze restricted assets issue.	1.20	\$1,260.00
04/21/25	AMUE	Develop confirmation trial strategy regarding witnesses, issues and team leads for each in light of Committee's opposition to plan (2.7); review privileged issue regarding documents (1.0).	3.70	\$3,885.00
04/21/25	MCM	Conference call with D. Martin and Foley team regarding participation in case as expert witness.	0.70	\$647.50
04/21/25	MRL	Call with D. Martin and M. Moore regarding status of the case and the plan confirmation process (.7); email correspondence with D. Martin regarding expert witness for plan confirmation (.3).	1.00	\$675.00
04/21/25	SJM	Email to A. Bardos regarding subpoenas to priests.	0.70	\$612.50
04/22/25	MCM	Work on issues in connection with plan confirmation hearing and witness designations.	0.70	\$647.50
04/22/25	MRL	Email correspondence with D. Martin regarding expert witness for plan confirmation and her qualifications.	0.20	\$135.00
04/22/25	NMCG	Research precedent regarding opt-out election for litigation claims (1.0); correspond with M. Moore regarding findings (.4).	1.40	\$980.00

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Foley & Lardner LLP

May 29, 2025

04/23/25	AMUE	Develop trial plan for contested case confirmation, including consideration of fact and expert witnesses.	2.60	\$2,730.00
04/23/25	MCM	Analyze potential expert witness issues in connection with confirmation.	0.40	\$370.00
04/24/25	AMUE	Prepare for (1.7) and meeting with M. Lee to develop plan confirmation strategy (witnesses and issues/exhibits) (.7).	2.40	\$2,520.00
04/24/25	MCM	Analysis of issues regarding potential expert witnesses at confirmation and retention of same.	0.80	\$740.00
04/25/25	SJM	Revise A. Bardos declaration in support of motion to quash subpoenas to priests.	0.40	\$350.00
04/28/25	AMUE	Meet with M. Lee to strategize regarding witnesses (1.0); outline confirmation trial issues and associated witnesses (2.2).	3.20	\$3,360.00
04/28/25	MCM	Strategy call with A. Uetz and M. Lee regarding confirmation hearing and preparation for same.	1.50	\$1,387.50
04/28/25	MRL	Email correspondence with D. Martin regarding the budget for an expert for the confirmation hearing (.2); confer with M. Moore regarding status of the confirmation process (.2).	0.40	\$270.00
04/28/25	SJM	Call with case team regarding discovery plan and approach to meet and confer with Committee.	0.80	\$700.00
04/28/25	TND	Call and emails with A. Uetz on preparation of confirmation brief and witness outline for Bishop Barber.	0.30	\$240.00
04/29/25	AMUE	Analyze contested confirmation trial plan and identify subject areas, witnesses and evidence for same.	6.00	\$6,300.00
04/29/25	TND	Gather information for Bishop Barber's deposition outline.	0.50	\$400.00
04/30/25	EPM	Review and revise witness list (0.5); review and revise case calendar (0.2).	0.70	\$588.00
04/30/25	MCM	Attention to plan confirmation hearing preparation.	0.60	\$555.00
04/30/25	MRL	Draft an email to D. Martin regarding an engagement letter as an expert witness.	0.20	\$135.00

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Foley & Lardner LLP

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04/30/25	TND	Call with S. Moses on information to be included in outline for Bishop Barber (.5); email to S. Moses and M. Moore on same (.1).	0.60	\$480.00
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Task Total:	50.30	\$46,524.50
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008 Communications with Client

04/02/25	SJM	Draft client update email regarding disclosure statement approval.	0.40	\$350.00
04/03/25	MCM	Draft email correspondence to client regarding final disclosure statement submission and approval and update regarding process.	0.50	\$462.50
04/03/25	SJM	Call with A. Bardos regarding final approval of disclosure statement for filing (.2); email correspondence with A. Bardos regarding same (.3); draft update email to client regarding disclosure statement approval and next steps (.4).	0.90	\$787.50
04/04/25	KAFA	Call with R. Medeiros to discuss certain documents.	0.20	\$90.00
04/04/25	MCM	Email correspondence with client parties regarding entry of order approving the disclosure statement.	0.30	\$277.50
04/07/25	AMUE	Review draft communication to client regarding developments in San Francisco Archdiocese case and task follow-up to complete same.	1.10	\$1,155.00
04/07/25	TND	Email correspondence with client communications team on release regarding order approving disclosure statement.	0.30	\$240.00
04/08/25	AMUE	Draft memorandum to client regarding privileged litigation issue (1.5); draft memorandum to client regarding privileged confirmation matters (1.3).	2.80	\$2,940.00
04/08/25	MDL	Telephone conference with M. Kemner regarding preparation for meeting with diocesan priests.	0.20	\$175.00
04/08/25	MDL	Participate in meeting with diocesan priests regarding bankruptcy case update and next steps.	2.20	\$1,925.00
04/08/25	TND	Email communications with client communications team on messaging around approval of disclosure statement.	0.30	\$240.00

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04/09/25	MDL	Telephone conference with client regarding public statements in connection with disclosure statement approval.	0.50	\$437.50
04/09/25	MDL	Telephone conference with M. Kemner regarding confidential mediation subject.	0.20	\$175.00
04/09/25	TND	Prepare for call on public statements regarding disclosure statement approval (.1); call regarding same with client and Foley teams (.5).	0.60	\$480.00
04/14/25	AMUE	Communication with M. Kemner regarding privileged issue related to discovery (.8); revise document for Bishop Barber regarding privileged issue related to plan confirmation (1.4).	2.20	\$2,310.00
04/14/25	MCM	Revise draft regarding disclosure statement approval and solicitation (.6); email correspondence with client parties and Foley team regarding same (.4).	1.00	\$925.00
04/14/25	TND	Revise draft letter from Bishop (.8); revise document for internal use (.7); communications with M. Kemner regarding same (.3).	1.80	\$1,440.00
04/15/25	AMUE	Draft revisions to document for Bishop Barber regarding privileged issue concerning plan confirmation matters.	1.40	\$1,470.00
04/15/25	AMUE	Multiple (6+) communications with client leadership regarding privileged issue related to Committee letter to creditors regarding plan solicitation and possible response thereto.	1.70	\$1,785.00
04/15/25	MDL	Telephone conference with R. Medeiros regarding Committee letter attached to disclosure statement and response to each disputed point.	0.20	\$175.00
04/15/25	MDL	Email exchange with R. Medeiros regarding Committee letter attached to disclosure statement.	0.40	\$350.00
04/15/25	TND	Further revisions to Bishop's draft communication on privileged matter.	1.60	\$1,280.00
04/16/25	AMUE	Revisions to document for Bishop Barber regarding privileged matter concerning confirmation.	1.10	\$1,155.00
04/16/25	AMUE	Finalize communication to client leadership summarizing privileged matters related to Committee's discovery requests.	0.90	\$945.00

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04/16/25	AMUE	Communication with M. Kemner and A. Bardos regarding professional fees issue with Committee.	0.40	\$420.00
04/16/25	AMUE	Draft communication to client leadership and certain employees regarding privileged issue concerning discovery (.8); revisions to document concerning privileged issue for M. Kemner and Bishop Barber (.9).	1.70	\$1,785.00
04/16/25	AMUE	Communication with D. Flanagan regarding cash forecast.	0.40	\$420.00
04/16/25	TND	Review M. Kemner revisions to Bishop's letter and internal document (.5); revise same (.3).	0.80	\$640.00
04/17/25	MDL	Telephone conference with A. Bardos and P. Bongiovanni regarding Class 3 claim holders.	0.50	\$437.50
04/21/25	AMUE	Revisions to response letter drafted by client rejecting settlement proposed by Committee.	0.90	\$945.00
04/22/25	AMUE	Meeting with D. Flanagan regarding revised cash forecast (.6); multiple emails with D. Flanagan and A. Bardos regarding cash forecast (1.1); meeting with M. Kemner regarding settlement discussions (.4); finalize privileged memorandum for Bishop Barber regarding discovery and confirmation matters (.9).	3.00	\$3,150.00
04/22/25	AMUE	Multiple communications with D. Flanagan and A. Bardos regarding cash forecast issues.	0.80	\$840.00
04/24/25	AMUE	Multiple communications with M. Kemner and client leadership regarding privileged discovery matter (1.1); draft communications to client regarding privileged matter concerning 85 priest subpoenas (1.2).	2.30	\$2,415.00
04/24/25	MDL	Telephone conference with M. Kemner, P. Bongiovanni, A. Bardos, and VeraCruz regarding post-Effective Date expenses and budget.	1.00	\$875.00
04/25/25	AMUE	Communications with R. Medeiros regarding privileged matter concerning motion to quash.	0.70	\$735.00
04/25/25	MDL	Correspondence with A. Bardos and P. Bongiovanni regarding Class 3 creditors.	0.50	\$437.50
04/28/25	AMUE	Multiple communications with M. Kemner and A. Bardos regarding privileged matter concerning discovery.	1.40	\$1,470.00

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04/28/25	TND	Prepare information on communications with individual priests regarding subpoenas for client update on current status.	0.10	\$80.00
04/29/25	MDL	Email exchange with M. Kemner regarding detailed analysis of potential exit facility collateral.	1.00	\$875.00
04/30/25	MDL	Email exchange with M. Kemner regarding exit facility collateral.	0.20	\$175.00
Task Total:			38.50	\$37,270.00

011 Cash Management

04/17/25	SJM	Respond to client regarding transfer of donation for the benefit of parish.	0.30	\$262.50
04/23/25	AMUE	Analyze revisions to cash forecast model (.9); communications with finance team regarding same (.6).	1.50	\$1,575.00
04/24/25	AMUE	Analyze cash needs for plan with RCBO finance team and M. Kemner (1.0); further analysis of plan funding issues (1.3); review current and projected burn rate (.8).	3.10	\$3,255.00
04/30/25	AMUE	Analyze privileged issue concerning plan funding (1.2); conference with D. Flanagan regarding cash forecast (.5); communications with M. Kemner regarding privileged issue concerning plan funding (.5).	2.20	\$2,310.00
Task Total:			7.10	\$7,402.50

012 Disclosure Statement

03/31/25	MCM	Work on solicitation issues with claims and noticing agent and Foley team.	1.00	\$925.00
04/01/25	MDL	Strategize with Foley team regarding disclosure statement negotiations and confirmation schedule.	1.10	\$962.50
04/01/25	MDL	Participate in telephone conference with Committee counsel regarding resolution of disclosure statement objection and confirmation schedule matters.	1.60	\$1,400.00

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04/01/25	MRL	Revise the presentation to conform to M. Moore's comments in preparation for hearing on the disclosure statement.	0.40	\$270.00
04/01/25	MWBE	Review research assignment for disclosure statement from A. Uetz.	0.10	\$60.00
04/02/25	MCM	Participate in conference call with Foley team and Committee counsel regarding disclosure statement approval and related issues, including hyperlinking of document (partial) (.7); prepare for status conference on disclosure statement order scheduled for April 3, 2025 (.3); email correspondence regarding same (.2); review revised documentation prior to filing with the Court for approval (.5).	1.70	\$1,572.50
04/02/25	MDL	Email correspondence with counsel for insurers regarding red-line to disclosure statement and order approving disclosure statement.	0.20	\$175.00
04/02/25	MDL	Telephone conference with B. Weisenberg (Lowenstein) and Foley team regarding revisions to disclosure statement and order approving disclosure statement.	1.00	\$875.00
04/02/25	MRL	Call with the Foley team and the Committee's counsel regarding revision to the disclosure statement.	1.10	\$742.50
04/02/25	MWBE	Prepare summary of audio file of the hearing regarding relief from the automatic stay in the bankruptcy case for the Archbishop of San Francisco as requested by A. Uetz.	4.50	\$2,700.00
04/02/25	SJM	Revise proposed order approving disclosure statement in light of comments from Committee (1.9); revise final forms of ballot for Classes 4 and 5 (.4); revise final forms of notice of confirmation hearing and non-voting status (.5); email to B. Weisenberg regarding revisions to disclosure statement order (.2).	3.00	\$2,625.00
04/02/25	SJM	Email correspondence with Committee counsel regarding continued hearing on 4/3 and final forms of solicitation documents (.5); draft notice of final forms of solicitation documents (1.7); work on finalizing solicitation documents for filing (1.6).	3.80	\$3,325.00

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04/02/25	SJM	Meeting with B. Weisenberg, M. Moore, and M. Lee regarding finalizing disclosure statement.	1.10	\$962.50
04/02/25	TND	Work on privileged issue in relation to disclosure statement (2.3); correspondence with A. Uetz and M. Lee on same (.2).	2.50	\$2,000.00
04/03/25	AMUE	Direct finalizing disclosure statement revisions per Committee resolution (.6) and review email communications with Committee counsel regarding same (.5).	1.10	\$1,155.00
04/03/25	EPK	Evaluate developments following today's continued disclosure statement hearing and further revised solicitation version of same to be filed.	0.20	\$175.00
04/03/25	ERR	Review status of approval of amended disclosure statement and insurance strategy regarding same.	0.50	\$550.00
04/03/25	JCH	Compile exhibits to disclosure statement (.2); email correspondence with S. Moses regarding same (.2); finalize (.4) and file (.1) final version of third amended disclosure statement and upload proposed order regarding same.	0.90	\$297.00
04/03/25	MCM	Review final versions of disclosure statement and related filings (.6); email and telephone communications with Foley team and Committee regarding disclosure statement issues prior to continued hearing on same (.5); follow-up work with Committee and claims and noticing agent regarding solicitation prior to deadline of April 11 (1.0); revise draft solicitation plan (.6).	2.70	\$2,497.50
04/03/25	MDL	Post-hearing telephone conference with M. Moore and S. Moses regarding results of hearing on disclosure statement and next steps for commencing solicitation and finalizing solicitation package documents.	0.50	\$437.50
04/03/25	SJM	Meeting with M. Lee and M. Moore regarding preparation for hearing on approval of disclosure statement (.7); follow-up call with M. Lee and M. Moore after hearing to discuss next steps (.3).	1.00	\$875.00
04/03/25	SJM	Work on finalizing disclosure statement for filing following approval of final form.	0.60	\$525.00
04/04/25	ERR	Review order approving disclosure statement.	0.30	\$330.00

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04/04/25	MCM	Email correspondence with counsel to Committee and claims and noticing agent regarding turnover at counsel firms for claimants and need to update case documents (.5); analysis of same in connection with solicitation of plan (.6); prepare for solicitation in week of April 11 prior to deadline (.5); review and revise proposed email with solicitation materials (.3).	1.90	\$1,757.50
04/04/25	SJM	Revise proposed order on confirmation schedule (.6); emails with Committee counsel regarding finalization of same (.2).	0.80	\$700.00
04/05/25	MCM	Email correspondence with Committee counsel regarding final solicitation version of Committee letter.	0.30	\$277.50
04/07/25	MCM	Email correspondence with Committee counsel regarding solicitation issues, including updates to counsel listings for claimants (.5); revise draft cover email for Class 4 creditor solicitation and circulate to Foley team for review (.4); call with claims and noticing agent regarding solicitation plan and next steps (.3); analysis of outstanding solicitation issues (.5).	1.70	\$1,572.50
04/07/25	MWBE	Review transcript of hearing (.5) and write condensed summary of same per A. Uetz (.2).	0.70	\$420.00
04/08/25	JCH	Compile solicitation version of disclosure statement and exhibits into one pdf and add bookmarks.	0.50	\$165.00
04/08/25	MCM	Confer with M. Thomas regarding potential Committee discovery and related issues (.4); revise draft transmittal letter for solicitation materials and circulate to Foley team for review (.3); analysis of updated solicitation emails from Committee counsel (.3); finalization of documents for uploading by claims and noticing agent (.5).	1.50	\$1,387.50
04/08/25	MDL	Revise cover email to be sent to Class 4 creditors' counsel with solicitation package.	0.10	\$87.50

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04/08/25	SJM	Final review of forms of solicitation documents for service (1.4); email correspondence with Verita and Foley team regarding final forms (.6); call with Verita regarding same (.2); prepare final disclosure statement with embedded links for Committee letter (.8).	3.00	\$2,625.00
04/08/25	SJM	Coordinate with Verita regarding finalizing solicitation packages.	1.40	\$1,225.00
04/09/25	MCM	Revise latest proposed solicitation plan from claims and noticing agent (1.3); revise cover email for use with solicitation packages to state-court counsel (.5); email and telephone correspondence regarding solicitation plan with Foley team and Verita (.5); telephone conference with client parties regarding disclosure statement approval and solicitation (.5); respond to final questions on solicitation plan from claims and noticing agent and analyze issues in connection with same (.4).	3.20	\$2,960.00
04/09/25	SJM	Analyze Class 6 claim solicitation issues (.6); email correspondence with M. Moore and Verita regarding same (.2).	0.80	\$700.00
04/10/25	EPK	Confer with S. Moses regarding unknown claims representative noticing and solicitation issues.	0.20	\$175.00
04/11/25	SJM	Respond to Verita regarding plan solicitation question.	0.20	\$175.00
04/14/25	MCM	Email correspondence with Committee and claims and noticing agent regarding procedure for electronic voting by abuse claimants and state-court counsel (.4); analyze follow-up solicitation report from claims and noticing agent (.4).	0.80	\$740.00
04/16/25	MCM	Work on solicitation issue involving claimant with multiple counsel and duplicative claims.	0.70	\$647.50
04/22/25	MCM	Analysis of solicitation issue raised by the Committee regarding execution of ballots through DocuSign by abuse claimants (.4); email correspondence with counsel confirming same is acceptable (.3).	0.70	\$647.50

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04/29/25	MCM	Email correspondence with claims and noticing agent regarding ballot summary for voting to date (.3); analyze same (.2).	0.50	\$462.50
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Task Total:	49.90	\$42,162.00
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016 General Case Strategy (includes team calls)

04/02/25	MDL	Strategize regarding privileged matter related to maximizing certain property.	1.60	\$1,400.00
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04/03/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.50	\$337.50
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04/03/25	TND	Research privileged matter in relation to disclosure statement (.7); work on revisions and additions to letters regarding same (2.2).	2.90	\$2,320.00
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04/06/25	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$675.00
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04/07/25	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to client.	0.40	\$270.00
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04/07/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	1.00	\$675.00
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04/07/25	MWBE	Consolidate summaries of relevant developments in the bankruptcy case of the Archdiocese of San Francisco as requested by A. Uetz.	0.60	\$360.00
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04/14/25	MDL	Revise public statements regarding plan proposal and disclosure statement approval.	0.20	\$175.00
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04/14/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$540.00
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04/14/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.50	\$337.50
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04/17/25	SJM	Email to A. Uetz and M. Lee regarding pending matters related to Committee filings.	0.30	\$262.50
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04/21/25	JRBL	Research inquiry from A. Uetz regarding document hold.	0.50	\$687.50
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04/21/25	LFG	Communications with team regarding litigation hold (.2); review records on same (.2).	0.40	\$480.00
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04/21/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.70	\$472.50
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04/21/25	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$675.00
04/21/25	TFCA	Review emails regarding document hold and numerous emails regarding same (.3); follow-up call with J. Blease regarding same (.2).	0.50	\$687.50
04/22/25	GSG	Telephone conference with A&M and D. Flanagan regarding restricted assets (.9); telephone conference with team regarding 4/23/25 status conference (.4).	1.30	\$1,365.00
04/22/25	MDL	Evaluate potential settlement terms based on recent developments in other cases.	0.20	\$175.00
04/22/25	MDL	Telephone conference with A. Uetz regarding ongoing mediation and settlement efforts.	0.20	\$175.00
04/22/25	MDL	Telephone conference with M. Moore regarding vote solicitation issue.	0.30	\$262.50
04/23/25	SJM	Draft updates to team on results of hearing (.8); draft client update regarding same (.4).	1.20	\$1,050.00
04/24/25	AMUE	Analyze outcome of status conference and next steps.	0.50	\$525.00
04/28/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.70	\$472.50
04/28/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	1.20	\$810.00
04/29/25	GSG	Review restricted asset issues (.4); telephone conference with S. Moses regarding same (.1); correspondence with team regarding same (.1).	0.60	\$630.00
04/29/25	MRL	Review email correspondence from T. Dolcourt regarding the weekly update email to be sent to the client.	0.20	\$135.00
04/29/25	SJM	Coordinate with case team on approach to 4/30 hearing on fee applications and motion to allow late-filed claim.	0.70	\$612.50
04/30/25	MCM	Telephone conference with A. Uetz regarding case strategy and related issues.	0.50	\$462.50

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04/30/25	SJM	Call with M. Lee regarding Class 6 claim issues (.3); review proofs of claim for Class 6 claims and background information (.9); email to M. Lee regarding analysis of same (.2).	1.40	\$1,225.00
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Task Total:	21.90	\$18,255.00
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017 Hearings and Court Matters

03/31/25	MCM	Prepare for contested hearing on approval of disclosure statement (4.0); prepare for and participate in strategy meeting with Foley team regarding same (2.2).	6.20	\$5,735.00
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04/01/25	AMUE	Prepare for hearing on motion to approve third amended disclosure statement (1.8); appearance at hearing on motion to approve third amended disclosure statement (including observing hearing in Friars chapter 11 case, and meeting with Committee to resolve objection to third amended disclosure statement) (5.2).	7.00	\$7,350.00
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04/01/25	ERR	Prepare for (3.8) and attend (5.2) hearing regarding approval of disclosure statement and related issues regarding insurance issues regarding plan.	9.00	\$9,900.00
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04/01/25	MCM	Prepare for contested hearing on approval of disclosure statement prior to travel to Court (2.3); participate in disclosure statement hearing and related negotiations with Committee (5.2); debrief with Foley team regarding same (.5).	8.00	\$7,400.00
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04/01/25	SJM	Prepare for hearing on disclosure statement.	2.10	\$1,837.50
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04/01/25	SJM	Attend hearing on third amended disclosure statement, and other matters (5.0); follow up on matters after hearing (1.9).	6.90	\$6,037.50
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04/03/25	MCM	Participate in disclosure statement hearing following filing of final solicitation documents.	0.50	\$462.50
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04/03/25	MDL	Strategize with M. Moore and S. Moses for hearing on disclosure statement.	0.70	\$612.50
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04/03/25	MDL	Appear for Debtor at hearing on disclosure statement (partial).	0.20	\$175.00
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04/03/25	SJM	Prepare for continued hearing on disclosure statement (1.3); appear via Zoom for continued disclosure statement hearing (.4).	1.70	\$1,487.50
04/22/25	MDL	Strategize with G. Goodman and S. Moses for status conference and possible oral argument to be held on 4/23.	0.50	\$437.50
04/22/25	SJM	Calls with Committee counsel and Courtroom Deputy regarding schedule for 4/23 hearings (.4); email to case team regarding same (.2).	0.60	\$525.00
04/23/25	AMUE	Provide advice to M. Lee regarding court status conference and hearing regarding Stout retention application and other matters.	0.50	\$525.00
04/23/25	GSG	Prepare for status conference on adversaries (.4); review opinion on RCWC et al. case (.3); participate in status conference (.3); telephone conference with M. Lee regarding same (.2); comment on summary of same (.1).	1.30	\$1,365.00
04/23/25	MDL	Appear for Debtor at status conference.	0.40	\$350.00
04/23/25	MDL	Strategize for status conference and possible oral argument with G. Goodman and S. Moses.	0.20	\$175.00
04/23/25	MDL	Prepare for status conference and possible oral argument on Stout Risius expansion application.	0.20	\$175.00
04/23/25	SJM	Attend hearing on Stout employment application and status conference in adversary proceeding.	0.90	\$787.50
04/24/25	MDL	Appear for Debtor at hearing on Stout Risius retention application.	0.40	\$350.00
04/24/25	MDL	Prepare for hearing on Stout Risius retention application.	0.20	\$175.00
04/30/25	AMUE	Prepare for (.5) and appearance at (.7) hearing on quarterly fee applications (partial attendance).	1.20	\$1,260.00
04/30/25	SJM	Attend hearings on interim fee applications and late-filed claims motion.	2.10	\$1,837.50
04/30/25	SJM	Update to case team regarding results of hearing.	0.60	\$525.00
04/30/25	SJM	Prepare for hearing on interim fee applications.	0.60	\$525.00

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04/30/25	SJM	Prepare for hearing on late-filed claims motion.	0.80	\$700.00
Task Total:			52.80	\$50,710.00

018 Non-Bankruptcy Litigation

04/01/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits (.3); call with E. Mazzocco regarding same (.5).	0.80	\$360.00
04/02/25	EPK	Supervisory review of proposed schools litigation documents to be produced to the NRF team (.6); email correspondence with E. Mazzocco and K. Farrar to coordinate with respect to same (.4).	1.00	\$875.00
04/02/25	EPM	Review documents slated for production.	0.60	\$504.00
04/02/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	0.80	\$360.00
04/02/25	MCM	Analyze issues concerning production of litigation files to counsel for RCWC alongside proofs of claim.	0.70	\$647.50
04/03/25	EPK	Continue supervisory review of documents marked for production to NRF team (.7); coordinate with Foley team regarding same (.6); email correspondence with R. Manns of NRF regarding status of production (.1).	1.40	\$1,225.00
04/03/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	0.30	\$135.00
04/03/25	MCM	Analyze issues concerning production of JCCP documents to RCWC and counsel for same.	0.30	\$277.50
04/04/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	0.60	\$270.00
04/06/25	EPK	Email correspondence with M. Moore regarding review and approval of NRF documents list (.1); review additional folders updated with schools pleadings (.2).	0.30	\$262.50

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04/07/25	EPK	Email correspondence with R. Manns of NRF regarding status of schools pleadings transmission (.1); review new JCCP 5108 case management conference order (.1); further supervisory review of additional school case files to be produced to NRF (1.9); evaluate issues concerning confidentiality protocols for RCWC and the schools, including review of amended bar date order and related confidentiality agreement (.3).	2.40	\$2,100.00
04/08/25	EPK	Finalize supervisory review of schools litigation files to be transmitted to NRF (1.2); coordinate with K. Farrar regarding production logistics and final sign-off of same (.4); email correspondence with the NRF team regarding status of production (.2); follow up with M. Moore regarding case files for 40 additional school actions to be compiled (.1).	1.90	\$1,662.50
04/08/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	2.90	\$1,305.00
04/09/25	EPK	Email correspondence with K. Farrar regarding next round of documents to be produced to the NRF team relating to school co-defendant matters (.2); review related email correspondence with the NRF team (.1).	0.30	\$262.50
04/09/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	0.30	\$135.00
04/10/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding "Bucket 1" remand list for the JCCP 5108 actions (.1); follow up with M. Moore regarding list of remaining 40 school cases for which documents will be produced to NRF as counsel to RCWC (.1).	0.20	\$175.00
04/10/25	KAFA	Troubleshoot Z. Low (NRF) download issues of JCCP 5108 lawsuit documentation transfer.	1.20	\$540.00
04/10/25	MCM	Email correspondence with Foley team and counsel for RCWC regarding production of additional documents in litigation.	0.40	\$370.00

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04/11/25	EPK	Email correspondence with M. Moore and K. Farrar regarding second set of cases for which schools pleadings files will be transferred to NRF (.2); separate email correspondence with J. Leito of NRF and M. Moore regarding same (.2).	0.40	\$350.00
04/11/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	2.90	\$1,305.00
04/11/25	MCM	Email correspondence with Foley team and counsel for RCWC regarding production of additional documents in litigation (.4); review email correspondence regarding analysis of cases and related matters (.4).	0.80	\$740.00
04/13/25	MCM	Email correspondence with Foley team and counsel for RCWC regarding production of additional documents in litigation (.4); review email correspondence regarding analysis of cases and related matters (.4).	0.80	\$740.00
04/14/25	EPK	Review issues highlighted by J. Leito of NRF regarding RCWC-involved bankruptcy claims and pending state court actions (.1); email correspondence with M. Moore and J. Leito of NRF regarding same (.1).	0.20	\$175.00
04/14/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	6.00	\$2,700.00
04/14/25	MCM	Analyze claims list from counsel for RCWC and related documents (.4); coordinate additional review by Foley team for documentation to be produced (.4).	0.80	\$740.00

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04/15/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding JCCP 5108 case management statement for next Monday's CMC (.3); review draft of case management statement (.1); analyze information relating to in-bound inquiries from NRF team regarding certain schools actions and internal responses to same (.4); email correspondence with M. Moore and K. Farrar regarding same (.2); conference call with J. Leito of NRF and Foley team regarding reconciliation of schools case lists and matching proofs of claim (.4); begin supervisory review of additional case files prepared by K. Farrar to be produced to the NRF team (.3); email correspondence with O. Rosaluk of DLA Piper regarding JCCP 5108 issues (.2).	1.90	\$1,662.50
04/15/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits (4.1); call with J. Leito (RCWC counsel) regarding claims (.4).	4.50	\$2,025.00
04/15/25	MCM	Review email correspondence from K. Farrar regarding analysis of RCWC claims (.5); conference call with counsel for RCWC regarding their analysis of claims asserting liability against that entity and production of litigation documents concerning same (.5); follow-up email correspondence with Foley team regarding same (.3).	1.30	\$1,202.50
04/16/25	EPK	Continue supervisory review of second wave of schools pleadings to be transferred to NRF (.6); call with O. Rosaluk of DLA Piper regarding Sisters of St. Joseph litigation claims (.6); email correspondence with J. Leito of NRF and B. Weisenberg of Lowenstein regarding request for access to additional unredacted proofs of claim (.1); email correspondence with D. Zamora of Weintraub Tobin regarding Plaintiff Liaison Counsel's omnibus motion for an order in limine to exclude evidence, instructions, or arguments in certain JCCP 5108 cases (.1).	1.40	\$1,225.00
04/16/25	KAFA	Communications with J. Leito (RCWC counsel) regarding AB218 lawsuit (.2); communications with J. Diaz (RCWC counsel/IT) regarding upload of case files (.4); prepare documents for NRF via iManage secure share (.3).	0.90	\$405.00

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04/17/25	MCM	Analysis of production issues of litigation documents to RCWC (.4); email correspondence regarding same (.2).	0.60	\$555.00
04/18/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding Prop 51 motion in limine filed by Plaintiffs in JCCP 5108.	0.10	\$87.50
04/18/25	EPK	Review joint case management statement filed in the JCCP 5108.	0.10	\$87.50
04/18/25	EPK	Email correspondence with B. Weisenberg of Lowenstein and J. Leito of NRF regarding request for additional unredacted abuse proofs of claim (.1); advise K. Farrar regarding process for transferring second wave of schools litigation documents to NRF and any related unredacted proofs of claim (.5); related correspondence with the NRF team regarding second transmission (.2).	0.80	\$700.00
04/18/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	3.30	\$1,485.00
04/18/25	SJM	Correspondence with R. Manns and J. Blanchard regarding state court litigation.	0.60	\$525.00
04/18/25	TND	Call with S. Moses on state court cases against co-defendants.	0.20	\$160.00
04/19/25	TND	Review issues related to new parties for state court actions.	0.30	\$240.00
04/21/25	EPK	Attend monthly case management conference for JCCP 5108 proceedings (.4); email correspondence with K. Farrar regarding third and final wave of schools litigation files to be sent to NRF (.1).	0.50	\$437.50
04/21/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits (2.9); prepare data/information regarding client document productions, collections and litigation work as requested by M. Mitcham (.5).	3.40	\$1,530.00
04/22/25	EPK	Review motions in limine filed by Plaintiffs' co-liaison counsel in the JCCP 5108 to assess effect of same on dioceses in bankruptcy, including RCBO (.2); supervisory review of proposed third and final set of school litigation files to be transferred to NRF team (.2).	0.40	\$350.00

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04/23/25	EPK	Finalize supervisory review of proposed third wave of schools litigation files to be sent to NRF team (.4); email correspondence with K. Farrar regarding same (.1); follow up with J. Leito of NRF regarding same (.1).	0.60	\$525.00
04/24/25	EPK	Review new case management conference order issued by Judge Chatterjee in JCCP 5108.	0.10	\$87.50
04/28/25	EPK	Email correspondence with J. Leito of NRF regarding list of schools cases involving bankruptcy claims (.1); related email correspondence with K. Farrar (.1).	0.20	\$175.00
04/30/25	EPK	Email correspondence with J. Leito of NRF regarding remaining batch of schools litigation files and corresponding bankruptcy proofs of claim (.3); separate email correspondence with M. Lee and K. Farrar regarding related file transfers to RCWC's co-counsel at Murphy Pearson (.2).	0.50	\$437.50
Task Total:			50.00	\$32,119.00

020 Retention/Billing/Fee Applications for Debtor Professionals

04/02/25	TND	Further drafting of motion to amend interim compensation motion and order (.8); draft related declaration of A. Bardos in support of same (.6).	1.40	\$1,120.00
04/08/25	SJM	Call with T. Dolcourt regarding response to fee examiner initial report (.2); follow up regarding information requested by fee examiner (.6).	0.80	\$700.00
04/08/25	TND	Discuss fee examiner letter with S. Moses (.2); review correspondence regarding same (.2).	0.40	\$320.00
04/10/25	AMUE	Review fee examiner objections to Foley's fee application (.2) and provide advice to team regarding response to same (.3).	0.50	\$525.00
04/10/25	JCH	Prepare omnibus certificate of no objection to Debtor professionals' February 2025 monthly fee statements.	0.80	\$264.00
04/10/25	MDL	Evaluate fee examiner's objections to Foley's interim fee application and corresponding response to fee examiner on each point of objection.	0.20	\$175.00

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04/10/25	SJM	Review draft omnibus CNO regarding fee statements for Debtor professionals.	0.20	\$175.00
04/10/25	SJM	Draft letter to fee examiner in response to initial report on Foley fee application.	1.40	\$1,225.00
04/10/25	TND	Begin reviewing information for March 2025 Foley fee statement.	0.20	\$160.00
04/11/25	MDL	Revise letter to fee examiner regarding support for interim fee application.	0.10	\$87.50
04/11/25	SJM	Revise letter to fee examiner based on comments from M. Lee.	0.30	\$262.50
04/11/25	TND	Begin review of information needed for Foley March 2025 fee statement.	0.20	\$160.00
04/15/25	SJM	Email to D. Klauder regarding response to fee examiner interim report.	0.30	\$262.50
04/15/25	SJM	Email to A. Bardos regarding payment of monthly professional fees.	0.30	\$262.50
04/17/25	TND	Review issue of interim compensation under current order.	0.10	\$80.00
04/17/25	TND	Email with A&M regarding March fee statement.	0.10	\$80.00
04/19/25	TND	Prepare information needed for March 2025 Foley fee statement to ensure compliance with U.S. Trustee guidelines.	0.50	\$400.00
04/20/25	TND	Revise motion to amend interim compensation order and related documents.	0.50	\$400.00
04/21/25	TND	Work on March Foley fee statement to ensure compliance with U.S. Trustee fee guidelines.	1.10	\$880.00
04/22/25	AMUE	Revisions to motion to amend interim compensation order to increase the holdback (2.2); leave voicemail for J. Blumberg regarding motion (.2); telephone call with D. Klauder regarding motion (.3); analyze revised cash forecast (.8).	3.50	\$3,675.00
04/22/25	JCH	Email correspondence with A. Uetz regarding motion to amend interim compensation procedures.	0.50	\$165.00
04/22/25	MDL	Evaluate amended interim compensation order issue.	0.40	\$350.00

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04/22/25	TND	Email correspondence with Foley team members on March fee statement (.4); revise motion to amend interim compensation order (1.6); call and emails with D. Flanagan and A. Uetz on forecasts to use in motion (.3).	2.30	\$1,840.00
04/23/25	SJM	Brief final review of motion to amend interim compensation procedures order.	0.60	\$525.00
04/23/25	TND	Further revisions and updates to the motion to amend the interim compensation order and related documents (3.2); communications with Foley team on same (.3); call with D. Flanagan on information in forecast (.1); further preparation of Foley March fee statement to ensure compliance with U.S. Trustee guidelines (.6).	4.20	\$3,360.00
04/24/25	TND	Email to A. Uetz on March fee statement (.1); review email from B. Weisenberg regarding request for Excel model of financing supporting motion to amend interim compensation order (.1).	0.20	\$160.00
04/29/25	SJM	Revise notice of hearing on motion to amend interim compensation procedures (.4); email correspondence with A. Uetz regarding hearing on same (.2).	0.60	\$525.00
04/29/25	SJM	Emails with J. Breall regarding hearing on fee applications (.2); email to A. Uetz regarding same (.3).	0.50	\$437.50
04/30/25	JCH	Prepare (.6) and file (.2) Foley monthly fee statement for March 2025.	0.80	\$264.00
04/30/25	TND	Finalize March Foley fee statement.	0.90	\$720.00
Task Total:			23.90	\$19,560.50

021 Retention/Fee Applications: Ordinary Course Professionals

04/02/25	TND	Begin to draft supplemental OCP motion to adjust caps on payments to professionals.	0.80	\$640.00
04/08/25	TND	Finalize Martens engagement agreement and related documents.	0.40	\$320.00

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04/11/25	TND	Review M. Kemner March 2025 fee statement (.2); emails to Committee counsel and U.S. Trustee with M. Kemner invoices (.2); email to K. Martens on OCP filing (.1); finalize documents for Martens filing (.3).	0.80	\$640.00
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Task Total:	2.00	\$1,600.00
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022 Retention/Fee Applications: Other Professionals

04/01/25	TND	Prepare additional information on increasing professional fee costs for hearing.	0.50	\$400.00
04/03/25	SJM	Prepare email to A. Bardos regarding February monthly fee statements (.4); email to A. Bardos regarding C. Sontchi CNO for February fee statement (.1).	0.50	\$437.50
04/04/25	SJM	Email to A. Bardos regarding CNO for Committee member expense reimbursement.	0.20	\$175.00
04/15/25	AMUE	Review issues related to Committee's proposed expanded retention of Stout.	0.80	\$840.00
04/15/25	TND	Email to A. Uetz on status of Committee retention of valuation expert.	0.10	\$80.00
04/16/25	JCH	Prepare chart of total fees billed so far for all case professionals.	0.50	\$165.00
04/16/25	MDL	Strategize with Foley team regarding objection to Stout Risius retention application.	0.70	\$612.50
04/16/25	MDL	Begin drafting objection to Stout Risius expansion application.	2.40	\$2,100.00
04/16/25	MDL	Analyze Stout Risius retention application.	0.30	\$262.50
04/16/25	SJM	Call with M. Lee regarding response to Stout expanded retention application (.2); call to court regarding same (.1); further call with M. Lee regarding relationship to prior DWC work (.2); draft discussion of prior DWC work for limited objection (1.4); email correspondence with M. Lee regarding same (.3).	2.20	\$1,925.00
04/17/25	AMUE	Outline limited objection to Committee's retention application for Stout (.9) and finalize revisions to same (1.2).	2.10	\$2,205.00

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04/17/25	MDL	Revise objection to Stout Risius expansion application.	1.80	\$1,575.00
04/17/25	SJM	Draft insert for limited objection to Stout retention regarding property of the estate limitations.	1.30	\$1,137.50
04/17/25	SJM	Review Debtor objection to expanded retention of Stout.	0.40	\$350.00
04/17/25	TND	Research information needed for limited objection to Stout retention as Committee expert.	1.00	\$800.00
04/18/25	AMUE	Finalize limited objection to Stout retention application.	0.80	\$840.00
04/18/25	JCH	Update chart with final fees and expenses requested by all professionals in Rockville diocese case.	1.20	\$396.00
04/18/25	MDL	Telephone conference with J. Prol and C. Restel (both of Lowenstein) regarding negotiations over objection to Stout Risius expansion application.	0.20	\$175.00
04/18/25	MDL	Revise objection to Stout Risius expansion application.	0.20	\$175.00
04/18/25	MDL	Email exchange with Lowenstein team regarding limited objection to Stout Risius expansion application.	0.10	\$87.50
04/18/25	SJM	Final revisions to limited objection to Stout retention.	0.40	\$350.00
04/18/25	TND	Review chart of DRVC fees for comparison to RCBO case (.2); review letter from Committee counsel on fees (.2).	0.40	\$320.00
04/21/25	JCH	Prepare updated chart of fees and expenses requested by professionals in Camden Diocese case.	1.00	\$330.00
04/21/25	SJM	Review status of monthly fee payments to professionals.	0.30	\$262.50
04/21/25	TND	Email correspondence with A. Uetz on fee letters exchanged with Lowenstein.	0.20	\$160.00
04/22/25	AMUE	Review application (.2) and provide advice (.3) regarding limited objection to expanded scope of BRG's retention application.	0.50	\$525.00

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04/22/25	MDL	Analyze Committee reply brief in support of Stout Risius expansion application.	0.50	\$437.50
04/23/25	MDL	Strategize with A. Uetz regarding argument on Stout Risius expansion application.	0.20	\$175.00
04/23/25	MDL	Evaluate BRG expansion application and possible grounds for objection.	0.40	\$350.00
04/23/25	MDL	Correspondence with Committee counsel regarding BRG expansion application.	0.40	\$350.00
04/23/25	SJM	Email to M. Lee regarding prior Stout retention in connection with pending application (.3); call with M. Lee regarding same (.3).	0.60	\$525.00
04/24/25	MDL	Email exchange with Lowenstein regarding scope of BRG expansion application.	0.40	\$350.00
04/24/25	MDL	Provide instruction to T. Dolcourt regarding limited objection to BRG expansion application.	0.30	\$262.50
04/24/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding resolution of objection to BRG expansion application.	0.40	\$350.00
04/24/25	MDL	Draft summary of hearing on Stout Risius expansion application.	0.10	\$87.50
04/24/25	MDL	Strategize with A. Uetz regarding limited objection to BRG expansion application.	0.10	\$87.50
04/24/25	SJM	Attend hearing on expanded retention of Stout.	0.60	\$525.00
04/24/25	TND	Review emails on result of Stout Risius retention hearing and potential objection to BRG retention expansion (.3); call with M. Lee regarding same (.3).	0.60	\$480.00
04/25/25	MDL	Revise proposed order on Stout Risius expansion application.	0.20	\$175.00
04/25/25	MDL	Email exchange with Lowenstein regarding proposed order on Stout Risius expansion application.	0.20	\$175.00
04/25/25	MDL	Telephone conference with B. Weisenberg regarding proposed order on Stout Risius expansion application.	0.30	\$262.50

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04/27/25	MDL	Email exchange with B. Weisenberg (Lowenstein) regarding form of BRG and Stout Risius expansion application orders.	0.10	\$87.50
04/28/25	MDL	Telephone conference with B. Weisenberg regarding cancellation of hearing on BRG retention application in light of resolution.	0.20	\$175.00
04/30/25	JCH	Prepare chart of interim payments due to professionals related to March 2025 fee statements and email same to S. Moses.	0.50	\$165.00
Task Total:			26.20	\$21,706.00

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

04/16/25	EPK	Email correspondence with D. Flanagan of VeraCruz regarding preliminary draft of March 2025 MOR (.2); brief review of initial draft of same (.1).	0.30	\$262.50
04/17/25	EPK	Finish review of preliminary draft of the March 2025 MOR (.7); brief call with D. Flanagan of VeraCruz regarding comments to same (.1); email correspondence with A. Bardos of RCBO and D. Flanagan regarding proposed updates to the March 2025 MOR and approval and authorization to file same on April 21, 2025 (.3).	1.10	\$962.50
04/21/25	EPK	Final pre-filing review of March 2025 MOR (.1); coordinate with J. Harrison regarding filing and service of same (.1); email correspondence with client team regarding as-filed copy of March 2025 MOR (.1).	0.30	\$262.50
04/21/25	JCH	File monthly operating report for March 2025 and circulate a filed copy of same to client group.	0.50	\$165.00
04/23/25	EPK	Review VeraCruz's calculation of quarterly U.S. Trustee fees Q1 2025.	0.10	\$87.50
04/29/25	EPK	Review quarterly U.S. Trustee fees calculation for Q1 2025 (.1); email correspondence with J. Harrison regarding same (.2).	0.30	\$262.50

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04/30/25	EPK	Email correspondence with D. Flanagan of VeraCruz and K. Farrar regarding March 2025 MOR supplements to be transmitted to BRG.	0.20	\$175.00
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Task Total:	2.80	\$2,177.50
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026 Unsecured Creditor Issues/Communications/Meetings

04/02/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding pre-confirmation hearing schedule.	0.30	\$262.50
04/02/25	MDL	Email exchange with Lowenstein regarding pre-confirmation hearing schedule.	0.30	\$262.50
04/02/25	MDL	Revise proposed pre-confirmation hearing schedule.	0.30	\$262.50
04/03/25	MDL	Revise Committee draft of pre-confirmation schedule.	0.30	\$262.50
04/03/25	MDL	Email exchange with Lowenstein regarding pre-confirmation hearing schedule.	0.20	\$175.00
04/04/25	MDL	Email exchange with Lowenstein attorneys regarding discovery schedule.	0.10	\$87.50
04/07/25	TND	Analyze amounts spent on Committee litigation filings for Committee professionals and Foley (2.6) ; draft letter to Committee counsel regarding fees (1.1).	3.70	\$2,960.00
04/08/25	AMUE	Review information necessary to draft letter to counsel for Committee regarding fee issue.	1.10	\$1,155.00
04/09/25	MDL	Revise letter to Lowenstein regarding professional fee issue.	0.40	\$350.00
04/10/25	AMUE	Meeting with J. Prol regarding fee issue (.3); finalize correspondence to Committee counsel regarding fee issue (1.2); review issues for discovery requests related to confirmation (1.1).	2.60	\$2,730.00
04/10/25	MDL	Revise letter to Committee counsel regarding request to commence discovery in dismissed adversary proceedings.	0.20	\$175.00
04/10/25	MDL	Revise letter to Lowenstein regarding issues surrounding administrative expense costs.	0.60	\$525.00

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04/10/25	TND	Further revisions to letter to Committee counsel regarding fees (1.6); update fee chart for same (.3).	1.90	\$1,520.00
04/11/25	MDL	Telephone conference with B. Weisenberg and M. Moore regarding solicitation issue and deadline for serving written discovery.	0.20	\$175.00
04/14/25	AMUE	Review issue concerning professional fees and recent increased run rate for Committee.	0.90	\$945.00
04/16/25	AMUE	Provide advice to refute Committee's wrongful allegation of bad faith by Debtor regarding OPF.	0.50	\$525.00
04/16/25	EPK	Email correspondence with M. Lee regarding internal protocol for handling creditor inquiries during the plan-solicitation process.	0.10	\$87.50
04/16/25	MDL	Draft protocol for fielding creditor inquiries regarding plan of reorganization and ballot instructions.	0.20	\$175.00
04/17/25	TND	Review messages from creditors regarding plan mailing.	0.20	\$160.00
04/20/25	SJM	Email to T. Dolcourt regarding creditor inquiry on plan.	0.20	\$175.00
04/21/25	SJM	Respond to L. Katz regarding plan status.	0.30	\$262.50
04/22/25	AMUE	Meeting with J. Prol and B. Weisenberg regarding interim compensation order issues.	0.40	\$420.00
04/22/25	AMUE	Revisions to draft response to T. Burns regarding settlement.	0.90	\$945.00
04/24/25	TND	Return calls to parties who have inquired on plan notices.	0.40	\$320.00
04/25/25	AMUE	Final review of financial model for production to Committee (.3) and email to B. Weisenberg regarding same (.2).	0.50	\$525.00
Task Total:			16.80	\$15,442.50

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027 Real Estate and Real Property Issues

04/22/25	TND	Attend strategy meeting with client on privileged issue concerning real estate (1.0); review email follow-up on same (.1).	1.10	\$880.00
04/23/25	TND	Call from client regarding privileged issue regarding real estate.	0.10	\$80.00
04/28/25	TND	Review notes on privileged issue regarding real estate (.4); review client correspondence on real estate matters (.2).	0.60	\$480.00
04/29/25	SJM	Attend meetings regarding privileged real estate issue.	2.50	\$2,187.50
04/29/25	SJM	Attend meeting regarding privileged real estate matter.	0.80	\$700.00
04/29/25	TND	Attend meeting with client regarding privileged real estate issue.	3.10	\$2,480.00

Task Total: 8.20 \$6,807.50

031 Insurance Issues (coverage, includes adversary proceeding)

04/01/25	AAWT	Review deposition transcripts, identifying relevant testimony and capturing relevant portions in chart for insurance matters.	1.40	\$735.00
04/02/25	AAWT	Review deposition transcripts, identifying relevant testimony and capturing relevant portions in chart for insurance matter.	3.90	\$2,047.50
04/02/25	EPM	Review documents for relevance and confidentiality for insurance matter.	1.00	\$840.00
04/03/25	AAWT	Review deposition transcripts, identifying relevant testimony and capturing relevant portions in chart for insurance matter.	3.50	\$1,837.50
04/03/25	EPM	Review documents for relevance and confidentiality for insurance matter.	2.00	\$1,680.00
04/04/25	AAWT	Review deposition transcripts, identifying relevant testimony and capturing relevant portions in chart (1.4); submit summary of findings regarding thousands of pages of transcript to assigning attorney for insurance matter (.4).	1.80	\$945.00

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04/04/25	EPM	Review documents for relevance and confidentiality (1.3); discussions with insurer counsel regarding deadlines for responses to document requests (.2).	1.50	\$1,260.00
04/04/25	ERR	Review request for extension from London insurers.	0.20	\$220.00
04/04/25	ERR	Review ROR letters from Lloyd's.	0.70	\$770.00
04/06/25	ERR	Email correspondence with mediator regarding disclosure statement approval.	0.30	\$330.00
04/07/25	EPM	Review documents for relevance and confidentiality (3.0); conference with M. Jew regarding privileged legal research subjects (.2); revise summary of legal research (.5).	3.70	\$3,108.00
04/07/25	ERR	Edit response to Plevin regarding demands.	0.40	\$440.00
04/07/25	MDL	Evaluate open discovery issues in adversary proceeding.	0.20	\$175.00
04/07/25	MSKJ	Prepare draft email response to Continental's counsel regarding assertion of stay violation in connection with claimant demand letters to Continental (.9); advise regarding 9th Circuit authorities analyzing whether demand letters to insurers of debtors and non-debtors violate the automatic stay (.3).	1.20	\$990.00
04/09/25	EPM	Revise responses and objections to insurer requests for production (.4); review documents for responsiveness and confidentiality (1.0).	1.40	\$1,176.00
04/10/25	ERR	Edit response to RFP from CNA.	1.20	\$1,320.00
04/11/25	EPM	Further revise responses and objections to insurer document requests.	1.90	\$1,596.00
04/14/25	AMUE	Analyze outstanding discovery and next steps related to same in coverage litigation.	0.80	\$840.00
04/14/25	EPM	Review status of document discovery.	0.30	\$252.00
04/14/25	MR	Review CIGA's responses to requests for production (.2); email communications with A. Uetz and M. Thomas regarding contents of previous document productions (.1).	0.30	\$238.50

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04/15/25	AMUE	Provide advice regarding settlement discussions with certain insurers.	0.50	\$525.00
04/15/25	EPM	Review documents for responsiveness and confidentiality (1.7); conference call with M. Roberts regarding outstanding discovery items (.5).	2.20	\$1,848.00
04/15/25	ERR	Review court order regarding deadlines stemming from disclosure statement.	0.30	\$330.00
04/15/25	ERR	Review case status and issues regarding pending mediation.	0.50	\$550.00
04/15/25	MR	Strategy teleconference and email communications with E. Mazzocco in preparation for completing document productions to insurers in insurance coverage action.	0.50	\$397.50
04/17/25	EPM	Conference call with M. Roberts regarding outstanding discovery issues (.5); conference call with M. Lee regarding document responsiveness and confidentiality (.3).	0.80	\$672.00
04/17/25	MDL	Discussion with E. Mazzocco regarding production of Clergy III discovery documents to insurers.	0.30	\$262.50
04/17/25	MR	Telephone communications with E. Mazzocco regarding preparation for coordinating review of documents potentially responsive to requests for production from insurers in insurance coverage action (.5); draft guidance chart for first-level review of documents for potential production to insurers (.4).	0.90	\$715.50
04/18/25	EPM	Strategize with M. Roberts regarding outstanding discovery tasks (.4); draft summary of document discovery status (1.2); review documents for responsiveness and confidentiality (.6).	2.20	\$1,848.00
04/18/25	ERR	Review issues regarding sealing of depositions in Clergy III.	0.40	\$440.00
04/18/25	MR	Continue drafting guidance chart for first-level review of documents potentially responsive to insurers' requests for production in insurance coverage action.	1.10	\$874.50

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04/21/25	AAWT	Review insurance case documents in preparation for document review strategy call (.4); strategy call for document review with M. Roberts, E. Asfora, and M. Rofaail (.8).	1.20	\$630.00
04/21/25	EPM	Revise instructions for document review.	0.30	\$252.00
04/21/25	ERAS	Call with M. Roberts, A. Witz and M. Rofaail regarding strategy for document review for insurance matter (.8); review documents for responsiveness in furtherance of responding to discovery requests. (1.4).	2.20	\$1,210.00
04/21/25	ERR	Review status of discovery responses regarding insurance regarding Chapter 11 litigation.	0.50	\$550.00
04/21/25	MR	Complete drafting comprehensive guidance chart for first-level review of documents potentially responsive to insurers' requests for production in insurance coverage action (.8); lead document review kick-off call with M. Rofaail, A. Witz and E. Asfora (.8).	1.60	\$1,272.00
04/21/25	MRL	Confer with M. Roberts, A. Witz, and E. Asfora regarding reviewing documents in the insurance adversary proceeding (.8); review email correspondence from M. Roberts regarding the same (.2).	1.00	\$675.00
04/22/25	AAWT	Review documents for responsiveness and privilege for insurer request for production in adversary proceeding.	0.90	\$472.50
04/22/25	ERAS	Call with M. Roberts, A. Witz, and M. Rofaail regarding strategy for document review in insurance adversary proceeding (.8); review documents for responsiveness in furtherance of responding to defendants' requests for production (.6).	1.40	\$770.00
04/22/25	ERR	Review issues regarding potential settlement.	0.50	\$550.00
04/22/25	MRL	Analyze documents in the insurance adversary proceeding to produce.	2.50	\$1,687.50
04/23/25	ERAS	Review documents for responsiveness in furtherance of responding to defendants' requests for production in insurance matter.	2.40	\$1,320.00

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04/23/25	ERR	Edit discovery responses in adversary matter regarding insurance issues.	0.80	\$880.00
04/23/25	MR	Respond to first-level reviewer questions regarding documents for potential production to insurers in insurance adversary proceeding.	0.20	\$159.00
04/23/25	MRL	Continue analyzing documents in the insurance adversary proceeding to produce.	1.70	\$1,147.50
04/24/25	AAWT	Review documents for responsiveness and privilege for insurer request for production in adversary proceeding.	0.30	\$157.50
04/24/25	ERAS	Review documents for responsiveness in furtherance of responding to discovery requests in insurance matter.	4.60	\$2,530.00
04/24/25	MR	Respond to additional first-level reviewer questions regarding documents for potential production to insurers in insurance adversary proceeding.	0.30	\$238.50
04/24/25	MRL	Continue analyzing documents in the insurance adversary proceeding to produce.	3.50	\$2,362.50
04/25/25	AAWT	Review documents for responsiveness and privilege for insurer request for production in adversary proceeding.	2.80	\$1,470.00
04/25/25	ERAS	Review documents for responsiveness in furtherance of responding to discovery requests for insurance matter.	3.30	\$1,815.00
04/25/25	MRL	Continue analyzing documents in the insurance adversary proceeding to produce.	3.50	\$2,362.50
04/26/25	MRL	Continue analyzing documents in the insurance adversary proceeding to produce.	0.90	\$607.50
04/27/25	AAWT	Review documents for responsiveness and privilege for insurer request for production in insurance adversary proceeding.	0.30	\$157.50
04/28/25	MR	Perform QC-level review of documents for potential production to insurers in insurance coverage action.	0.70	\$556.50
04/28/25	MRL	Review email correspondence from M. Roberts regarding reviewing documents for the insurance adversary proceeding.	0.20	\$135.00

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04/30/25	EPM	Review status of discovery (0.2); conference call with M. Roberts regarding same (0.4).	0.60	\$504.00
04/30/25	MR	Email and telephone communications with E. Mazzocco regarding QC review of documents and additional discovery tasks in insurance coverage action.	0.40	\$318.00
Task Total:			76.00	\$54,053.50

032 Rule 2004 Motions/Discovery/Subpoenas

04/01/25	EPM	Conference call with K. Farrar regarding document production to RCWC.	0.50	\$420.00
04/03/25	MDL	Strategize with Foley team regarding pre-confirmation discovery to be served on Committee.	1.00	\$875.00
04/08/25	AMUE	Outline discovery plan related to confirmation of plan.	1.60	\$1,680.00
04/09/25	JMT	Revise discovery requests to incorporate comments from team regarding requests related to restricted assets, litigation financing, and proxies (2.3); confer with team regarding same (.4).	2.70	\$2,362.50
04/09/25	MCM	Confer with M. Thomas regarding discovery requests to Committee (.4); analyze same in context of confirmation (.4).	0.80	\$740.00
04/09/25	MDL	Evaluate Committee discovery demand in dismissed adversary proceeding.	0.20	\$175.00
04/10/25	MDL	Revise discovery requests to Committee.	0.50	\$437.50
04/11/25	AMUE	Revisions to discovery related to confirmation hearing.	1.50	\$1,575.00
04/11/25	MCM	Analyze revisions to written discovery being sent to Committee (.3); conference calls with M. Lee and M. Thomas regarding same (.6); analyze Committee discovery to Debtor and purported related parties (.4).	1.30	\$1,202.50
04/11/25	MDL	Strategize with Foley team regarding discovery requests to Committee.	0.70	\$612.50
04/11/25	MDL	Revise discovery requests to Committee.	1.00	\$875.00

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04/12/25	MDL	Email exchange with R. Manns (Norton Rose Fulbright) regarding Committee discovery requests to RCWC and Debtor.	0.20	\$175.00
04/12/25	MDL	Telephone conference with C. Restel (Lowenstein) regarding Committee discovery requests.	0.20	\$175.00
04/13/25	AMUE	Analyze discovery needed for contested confirmation hearing (1.9); identify affirmative witnesses needed (1.2) and identify defensive/rebuttal witnesses needed (1.1).	4.20	\$4,410.00
04/13/25	MRL	Review email correspondence from M. Lee regarding discovery requests from the Committee.	0.20	\$135.00
04/14/25	AMUE	Review summary of documents produced to Committee to inform next steps (.9); meeting with M. Moore and M. Lee regarding discovery plan (.5); analyze discovery requests received from Committee (1.6).	3.00	\$3,150.00
04/14/25	JCH	Upload copies of discovery requests received from Committee to Q drive folder (.2); prepare draft responses to Committee's First Requests for Production and First Set of Interrogatories (.8).	1.00	\$330.00
04/14/25	JMT	Analyze discovery requests served on RCBO and related parties.	1.30	\$1,137.50
04/14/25	MDL	Evaluate Committee demand for adversary proceeding discovery.	0.20	\$175.00
04/14/25	MDL	Email exchange with C. Restel (Lowenstein) regarding service of subpoenas and acceptance of service.	0.20	\$175.00
04/14/25	MDL	Strategize regarding motion to quash subpoenas to pastors.	0.20	\$175.00
04/14/25	MRM	Strategize in connection with discovery served by Committee (.6); review discovery and subpoenas (1.0).	1.60	\$1,080.00
04/15/25	AMUE	Meeting with M. Thomas and M. Lee regarding discovery strategy (1.0); analyze discovery requests to determine need for motions to quash (including 85 subpoenas issued by Committee to individual priest employees) (1.1).	2.10	\$2,205.00

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04/15/25	JCH	Meeting with Foley team to discuss discovery requests received from Committee (.8); finalize shell discovery responses and email same to M. Thomas, M. Rofaeil and M. Mitcham (.5).	1.30	\$429.00
04/15/25	JMT	Meet with team to discuss prior discovery responses and productions (.6); analyze prior discovery productions and indexes of productions to assist with responding to current discovery requests from the Committee (2.2); analyze all discovery served by Committee and summarize discovery requests and generate a discovery plan for responding to same (3.4); call with A. Uetz regarding discovery strategic response (partial) (.5).	6.70	\$5,862.50
04/15/25	MCM	Strategy conference call with Foley team regarding discovery issues (1.0); follow-up work regarding same (.4).	1.40	\$1,295.00
04/15/25	MDL	Meeting with Foley team to strategize about motions to quash Committee discovery requests and other response strategies.	1.20	\$1,050.00
04/15/25	MDL	Meeting with A. Uetz and M. Thomas to strategize on overall discovery plan.	1.00	\$875.00
04/15/25	MRL	Analyze the discovery requests from the Committee (1.5); confer with the Foley team regarding strategies for discovery responses to the Committee's requests (1.2).	2.70	\$1,822.50
04/15/25	MRM	Strategize in connection with discovery for confirmation hearing (1.0); analysis of written discovery requests (.8).	1.80	\$1,215.00
04/15/25	SJM	Attention to docketing of discovery deadlines.	1.20	\$1,050.00
04/16/25	AMUE	Strategize with G. Goodman regarding restricted asset discovery (.5) and provide advice to team regarding same (.4).	0.90	\$945.00
04/16/25	AMUE	Analyze discovery requests to provide direction to Foley team regarding motions to quash.	1.20	\$1,260.00
04/16/25	GSG	Prepare draft of response to Committee letter regarding adversary discovery (.6); correspondence with team on same (.2).	0.80	\$840.00

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04/16/25	JMT	Draft correspondence to the priests concerning subpoenas (.6); confer with team regarding interrogatory responses (.5); draft motion to quash and confer with team regarding same (1.3); draft and respond to discovery requests served on Debtor (3.2).	5.60	\$4,900.00
04/16/25	MCM	Analyze issues concerning prior productions and coordination with RCWC's counsel in responding to discovery.	0.30	\$277.50
04/16/25	MDL	Strategize for responses to Committee discovery requests.	0.60	\$525.00
04/16/25	MR	Review individual summaries of previous document productions and draft comprehensive summary for A. Uetz and M. Thomas.	0.50	\$397.50
04/16/25	MRL	Email correspondence with the Foley team regarding the responses to the Committee's discovery requests.	0.40	\$270.00
04/16/25	MRM	Research in connection with motion to quash subpoenas served by Committee (3.0); analysis of subpoenas and duplicity of requests in requests for production to Debtor (1.0); preliminary drafting for motion to quash (.9).	4.90	\$3,307.50
04/16/25	SJM	Call with M. Thomas regarding discovery responses.	0.70	\$612.50
04/17/25	AMUE	Analyze strategy with client regarding certain discovery requests posed by Committee (1.1); review prior production summaries to determine need for motion to quash regarding certain Committee discovery requests (1.3).	2.40	\$2,520.00
04/17/25	GSG	Comment on interrogatory response issues regarding restricted assets.	0.50	\$525.00
04/17/25	JCH	Prepare spreadsheet with priest names, email addresses and links to subpoenas and prepare mail merge document to automate sending of 80 email messages.	2.20	\$726.00

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04/17/25	JMT	Confer with team regarding interrogatory requests concerning abuse claims (.4); review documents that were previously produced concerning abuse claims (.6); confer with team regarding interrogatory requests concerning restricted assets (.7); overview of IT systems in the Diocese (.4); provide update on discovery status to team and strategy concerning priest subpoenas (.6); continue drafting responses to discovery requests served on Debtor (1.5).	4.20	\$3,675.00
04/17/25	MCM	Analyze discovery issues in connection with confirmation of third amended plan of reorganization.	0.70	\$647.50
04/17/25	MR	Complete review of previous document productions and drafting of comprehensive summary thereof for A. Uetz and M. Thomas.	1.10	\$874.50
04/17/25	MRL	Call with the client, IT systems, and the Foley team to discuss the IT systems for the Committee's discovery requests (.8); email correspondence with the Foley team regarding the Committee's discovery requests (.4); confer with M. Thomas regarding drafting a litigation hold letter to the priests (.2); draft the litigation hold letter to be sent to the priests regarding the Committee's discovery requests (1.6).	3.00	\$2,025.00
04/17/25	MRM	Research in connection with standing to quash third-party subpoena (3.0); research in connection with basis for quashing third-party subpoenas due to burden to party and non-party in responding (1.1).	4.10	\$2,767.50
04/17/25	SJM	Draft memo to team regarding discovery next steps and assignments following discovery meeting.	0.80	\$700.00
04/17/25	SJM	Analyze interrogatories and information needed for responses (1.7); email to M. Thomas regarding same (.5).	2.20	\$1,925.00
04/17/25	SJM	Foley team call regarding plan confirmation discovery.	1.10	\$962.50
04/18/25	AMUE	Provide advice regarding response to Committee letter regarding discovery in adversary proceeding.	0.30	\$315.00

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04/18/25	EPK	Review email correspondence with M. Kaplan of Lowenstein and G. Goodman regarding discovery requests and related disputes.	0.10	\$87.50
04/18/25	GSG	Finalize correspondence to Committee regarding discovery in adversary proceeding.	0.20	\$210.00
04/18/25	JMT	Confer with team regarding quash and motion for protection strategy (.4); analyze requests served on priests in subpoenas (1.1); confer with team regarding motion to quash and review case law concerning standing issues (1.3).	2.80	\$2,450.00
04/18/25	KAFA	Analysis and summary of information for interrogatories 1-3 within bankruptcy discovery requests (1.0); communications with M. Moore and M. Thomas regarding same (.5).	1.50	\$675.00
04/18/25	MCM	Analysis of subpoena issues to priests as employees of RCBO (.5); conference call with M. Thomas regarding same (.4); conference call with M. Lee regarding document identification and related issues (.4); analysis of same (.3).	1.60	\$1,480.00
04/18/25	MDL	Evaluate past production of documents to Committee in lieu of new formal requests.	0.30	\$262.50
04/18/25	MRL	Confer with M. Thomas regarding drafting the motion to quash the Committee's request for documents.	0.20	\$135.00
04/18/25	MRM	Research in connection with special interest in documents requested in third-party subpoena (3.0); research in connection with motion for protective order against third-party subpoena (2.1).	5.10	\$3,442.50
04/18/25	SJM	Work on discovery responses.	2.10	\$1,837.50
04/18/25	SJM	Email to case team regarding document collection matters.	0.40	\$350.00
04/20/25	MCM	Analyze responses/objections to subpoenas to priests as employees of RCBO seeking Debtor documents.	0.60	\$555.00
04/20/25	MRL	Begin drafting the motion to quash the Committee's request for documents and interrogatories.	1.10	\$742.50

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04/20/25	MRM	Draft motion to quash and motion for protective order in connection with 85 subpoenas served on clergy members.	5.90	\$3,982.50
04/20/25	SJM	Review interrogatories from Committee and begin preparing responses.	0.70	\$612.50
04/20/25	SJM	Email to M. Thomas regarding restricted assets issues and discovery (.3); email correspondence with R. Manns and M. Thomas regarding discovery related to NDCEs (.3).	0.60	\$525.00
04/21/25	AMUE	Meeting with Foley team to strategize regarding discovery.	1.00	\$1,050.00
04/21/25	EPK	Email correspondence with S. Moses regarding internal restricted funds analysis (.1); further confer with S. Moses regarding same as it relates to outstanding discovery requests from the Committee (.7).	0.80	\$700.00
04/21/25	GSG	Participate in call regarding discovery.	0.50	\$525.00
04/21/25	JMT	Confer with team regarding restricted assets and discovery responses concerning same (.6); confer with counsel for RCWC and RCC regarding discovery requests (.5); revise motion to quash priest subpoenas (1.4); continue drafting responses to discovery requests served on Debtor (3.3); revise motion for protection for duplicative discovery served on Debtor (1.4).	7.20	\$6,300.00
04/21/25	MCM	Email correspondence with M. Thomas regarding litigation documents and prior productions.	0.30	\$277.50
04/21/25	MRL	Confer with M. Moore and M. Thomas regarding strategies for responding to the Committee's discovery requests (.4); continue drafting the motion to quash the Committee's request for documents and interrogatories (2.9); draft the proposed order granting the motion (.3).	3.60	\$2,430.00
04/21/25	MRM	Draft motion to quash and motion for protective order in connection with 85 subpoenas served on clergy members.	5.30	\$3,577.50
04/21/25	SJM	Work on discovery issues related to prior productions to Committee.	1.30	\$1,137.50

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04/21/25	SJM	Call with M. Thomas and R. Manns and team regarding discovery directed to non-debtor Catholic entities.	0.50	\$437.50
04/21/25	SJM	Meeting with G. Goodman, M. Thomas, and A. Uetz regarding approach to discovery responses (partial) (.5); email to M. Thomas regarding issue related to discovery responses (.4); call with E. Khatchatourian regarding restricted assets substantiation process (.6); call with M. Thomas regarding discovery responses and next steps (.4); analyze restricted cash substantiation in order to evaluate updates needed for discovery (2.1).	4.00	\$3,500.00
04/22/25	AMUE	Provide advice regarding discovery concerning third parties (.7); outline inputs to draft discovery responses (RFPs) (.8).	1.50	\$1,575.00
04/22/25	EPK	Compile documents for S. Moses relating to analysis of donor-restricted funds (.2); email correspondence with S. Moses regarding scope of documents produced to the Committee relating to non-debtor Catholic entities (.2).	0.40	\$350.00
04/22/25	JMT	Confer with K. Farrar about prior productions (.5); analyze discovery responses in light of prior productions (1.3); draft discovery responses to discovery served on Debtor (2.3); confer with team regarding interrogatory discovery responses (.4); edit motions to quash (.7); review discovery served on VeraCruz and analyze prior productions (.6); analyze discovery productions in light of discovery requests served on Bishop Barber (.8).	6.60	\$5,775.00
04/22/25	KAFA	Analysis of client document collections, document productions, past settlements and other discovery information in preparation for responses to formal discovery requests (interrogatories) (3.3); call with M. Thomas and M. Moore regarding same (.5).	3.80	\$1,710.00
04/22/25	MCM	Analysis of scope of prior productions to Committee in advance of response deadline for discovery requests (.5); conference call with K. Farrar and M. Thomas regarding same to avoid duplication of work and allow for fulsome responses about productions (.5).	1.00	\$925.00

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04/22/25	MDL	Telephone conference with A&M, VeraCruz, A. Bardos, and Foley team regarding restricted assets analysis and remaining discovery needed on this topic.	0.90	\$787.50
04/22/25	MDL	Strategize for motion to quash.	0.20	\$175.00
04/22/25	MDL	Telephone conference with S. Moses regarding Debtor's interrogatory responses (.2); follow up on same (.2).	0.40	\$350.00
04/22/25	MR	Telephone communication with S. Moses regarding document requests from and productions to Committee.	0.20	\$159.00
04/22/25	MRL	Finalize drafting the motion to quash the Committee's request for documents and interrogatories (1.3); draft the declaration in support of the motion to quash the Committee's requests (.6).	1.90	\$1,282.50
04/22/25	MRM	Research regarding required responses to subpoena when motion to quash is on file (1.0); research in connection with privileged communications made with affiliated entities in connection with bankruptcy proceedings (1.0); draft objections to requests for production from Committee (5.1).	7.10	\$4,792.50
04/22/25	SJM	Review files on past settlements in order to prepare interrogatory regarding same (1.2); emails to K. Farrar regarding same (.2).	1.40	\$1,225.00
04/22/25	SJM	Work on responses to Committee's first set of interrogatories.	6.60	\$5,775.00
04/22/25	SJM	Call with M. Roberts regarding prior production of non-Debtor related documents (.2); analyze status of discovery responses (.5); call with M. Lee regarding same (.2).	0.90	\$787.50
04/23/25	AMUE	Revisions to RFP responses (1.5); revisions to motion to quash 85 subpoenas issued to priest employees, and motion to quash requests for production (2.3).	3.80	\$3,990.00
04/23/25	EPM	Draft responses to requests for production (3.6); draft interrogatory responses (1.4).	5.00	\$4,200.00

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04/23/25	GSG	Analyze interrogatory responses regarding restricted assets.	0.50	\$525.00
04/23/25	JCH	Prepare shell responses to document requests directed to Bishop Barber and VeraCruz.	0.50	\$165.00
04/23/25	JMT	Draft responses to written discovery propounded by Committee on Debtor (3.8); revise motion to quash and confer with team regarding arguments concerning burden and proportionality (1.8); revise interrogatory responses (1.9); edit motion to quash discovery requests served by Committee on Debtor (2.2); confer internally with team regarding strategy of objecting or quashing Committee's burdensome and duplicative requests served on Debtor (1.5).	11.20	\$9,800.00
04/23/25	KAFA	Work on responses to discovery requests (6.2); call with M. Thomas and M. Moore regarding same (.3).	6.50	\$2,925.00
04/23/25	MCM	Analyze issues in connection with employee subpoenas and direct document requests to Debtor (.5); review draft interrogatory responses (.4); email and telephone correspondence with Foley team regarding discovery issues (.4).	1.30	\$1,202.50
04/23/25	MDL	Strategize with A. Uetz regarding deposition preparation and discovery responses.	0.30	\$262.50
04/23/25	MDL	Revise Debtor's written discovery responses.	1.10	\$962.50
04/23/25	MRL	Confer with M. Thomas regarding revising the motion to quash the Committee's discovery requests (.3); revise the motion to quash to conform to M. Thomas' comments (1.6); confer with M. Thomas regarding revising the declaration in support of motion to quash (.2).	2.10	\$1,417.50
04/23/25	MRM	Draft objections to subpoena served on Bishop Barber by the Committee (3.0); draft objections to subpoena served on VeraCruz by the Committee (3.6).	6.60	\$4,455.00
04/23/25	SJM	Call with M. Thomas regarding status of discovery responses and tasks to finalize (.2); call with E. Mazzocco regarding insurance-related responses (.2); emails with case team regarding next steps in document collection (.3); further revision of interrogatory responses (.5).	1.20	\$1,050.00

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04/23/25	SJM	Continue work on drafting responses to first set of interrogatories (3.1); email to M. Thomas regarding same (.2).	3.30	\$2,887.50
04/23/25	SJM	Revise draft interrogatory responses based on comments from M. Thomas and additional information regarding prior productions.	0.70	\$612.50
04/24/25	AMUE	Revisions to motion to quash.	1.00	\$1,050.00
04/24/25	EPK	Confer with S. Moses and J. Harper regarding discovery responses relating to restricted assets and relevant prior analyses (.4); review Ninth Circuit case law analysis relating to same (.1).	0.50	\$437.50
04/24/25	JCH	Revise response to subpoena to Bishop to add objections from Debtor's response to related requests (.5); revise responses to Committee's requests for production and interrogatories propounded to Debtor (1.2).	1.70	\$561.00
04/24/25	JMT	Draft discovery requests to Bishop Barber (1.2); draft responses to discovery requests served on VeraCruz (1.4); revise Debtor's interrogatory and RFP responses (2.7); coordinate with A. Uetz concerning subpoenas to the clergy and communications to the clergy regarding same (.7); confer with opposing counsel on discovery and motion to quash (.8); coordinate with counsel for RCWC and RCC concerning Debtor's prior productions (.6); revise motion to quash incorporating arguments that employees do not have control over employer's documents (1.8).	9.20	\$8,050.00
04/24/25	JSH	Call and communications with E. Khatchatourian and S. Moses regarding discovery issues (partial).	0.20	\$160.00
04/24/25	KAFA	Work on responses to discovery requests.	2.80	\$1,260.00
04/24/25	MCM	Analysis of issues regarding discovery responses and motion to quash employee subpoenas.	0.50	\$462.50
04/24/25	MDL	Strategize with A. Uetz regarding status of discovery responses and overall discovery strategy.	0.70	\$612.50
04/24/25	MDL	Strategize with M. Moore regarding document and information collection issues in response to Committee discovery requests.	0.40	\$350.00

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04/24/25	MDL	Strategize with M. Thomas regarding motions to quash.	0.10	\$87.50
04/24/25	MDL	Correspondence with D. Flanagan and C. de Quesada regarding draft responses to discovery requests directed to VeraCruz.	0.10	\$87.50
04/24/25	MDL	Revise responses to discovery requests directed to VeraCruz.	0.90	\$787.50
04/24/25	MDL	Strategize with Foley team regarding responses to discovery requests directed to VeraCruz and Bishop Barber, and on motions to quash.	0.30	\$262.50
04/24/25	MDL	Participate in meet-and-confer with Committee counsel regarding discovery objections, privilege log issues, and motions to quash.	0.80	\$700.00
04/24/25	MRM	Draft declarations in support of motion to quash and for protection against clergy subpoenas (1.5); finalize responses to subpoena served on Bishop Barber (2.0); finalize responses to subpoena served on VeraCruz (2.0); finalize responses to requests for production served on the Debtor (2.4).	7.90	\$5,332.50
04/24/25	SJM	Gather additional information needed for discovery responses.	1.70	\$1,487.50
04/24/25	SJM	Call with M. Thomas regarding discovery status (.3); call with M. Lee regarding prior production of accounting database (.2); call with P. Bongiovanni regarding same (.4).	0.90	\$787.50
04/24/25	SJM	Further revise draft interrogatory responses to address comments on objections.	0.80	\$700.00
04/24/25	SJM	Meet and confer call with Committee regarding discovery motions.	0.80	\$700.00
04/24/25	SJM	Prepare verification of interrogatories.	0.30	\$262.50
04/24/25	TND	Call with A. Uetz on subpoenas to priests (.1); review emails on same (.1).	0.20	\$160.00

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04/25/25	AMUE	Revisions to motion to quash (1.4); provide advice regarding objections to certain discovery requests to incorporate into objections and responses (1.8); review emails with Foley team to finalize objections and responses (.7); revisions to declaration of A. Bardos in support of motion to quash (.9).	4.80	\$5,040.00
04/25/25	AMUE	Draft communication regarding privileged matter concerning discovery, including extensive 85 subpoenas served on priest employees and follow-up emails received from client regarding same.	2.40	\$2,520.00
04/25/25	EPK	Review email correspondence and letter communication with Lowenstein Sandler team regarding the Committee's responses and objection to the Debtor's discovery requests.	0.20	\$175.00
04/25/25	JCH	Prepare comparison chart of duplicative document requests received from Committee.	1.00	\$330.00
04/25/25	JMT	Final revisions to the discovery requests served on Debtor (2.4); final revisions to motion to quash (3.4); revise declaration of A. Bardos (.7); confer with A. Bardos regarding interrogatory responses (.5); confer with VeraCruz regarding discovery responses (.5); revise declaration of M. Lee (.3); assist team with finalizing and serving discovery responses (.6).	8.40	\$7,350.00
04/25/25	MCM	Analyze final discovery responses and motion to quash employee subpoenas.	0.80	\$740.00
04/25/25	MDL	Revise motion to quash.	0.90	\$787.50
04/25/25	MDL	Strategize with Foley team regarding motion to quash.	0.60	\$525.00
04/25/25	MDL	Strategize with S. Moses regarding responses to document requests to Bishop Barber.	0.20	\$175.00
04/25/25	MDL	Revise written discovery responses.	1.00	\$875.00
04/25/25	MRM	Revise motion to quash and for protection against clergy subpoenas (4.0); package supporting exhibits thereto (1.1); draft proposed order (.5); finalize discovery responses for Debtor (1.5); finalize discovery responses for Bishop Barber (.5); finalize discovery responses for VeraCruz (.5).	8.10	\$5,467.50

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04/25/25	SJM	Email to A. Bardos regarding declaration in support of motion to quash priest subpoenas (.2); review and revise motion (.8); prepare notice of hearing on same (.4); further revisions to declarations in support of same (.3); emails with case team regarding finalizing motion (.4).	2.10	\$1,837.50
04/25/25	SJM	Meeting with A. Bardos regarding interrogatory responses and motion to quash priest subpoenas (.3); meeting with VeraCruz regarding responses to discovery directed to VeraCruz (.5); call with D. Flanagan regarding interrogatory responses (.2); call with M. Thomas regarding finalizing responses (.2).	1.20	\$1,050.00
04/25/25	SJM	Prepare exhibits to interrogatory responses regarding real property (1.9); call with M. Lee regarding same (.2).	2.10	\$1,837.50
04/25/25	SJM	Revise responses to requests for production to VeraCruz (1.1); revise responses to subpoena to Bishop Barber (1.8); confer with M. Lee regarding same (.2).	3.10	\$2,712.50
04/25/25	TND	Review matters related to subpoena to each priest in the diocese to best determine discovery process.	1.20	\$960.00
04/26/25	MRM	Analyze discovery responses from Debtor in preparation for document collection.	4.60	\$3,105.00
04/26/25	TND	Email correspondence with RCBO priests regarding the subpoenas directed to each of them.	2.20	\$1,760.00
04/27/25	TND	Email correspondence with RCBO priests regarding the subpoenas directed to each of them.	1.60	\$1,280.00
04/28/25	AMUE	Work on review of discovery responses.	1.90	\$1,995.00
04/28/25	AMUE	Prepare for (.5) and meet with Foley team to strategize regarding discovery tasks (1.5).	2.00	\$2,100.00
04/28/25	MCM	Conference call with Foley team regarding discovery issues, strategy going forward, and deposition scheduling.	1.00	\$925.00
04/28/25	MDL	Prepare for (.2) and strategize with Foley team regarding response to Committee's discovery motion and issues with Committee's discovery responses (1.0).	1.20	\$1,050.00

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04/28/25	MDL	Strategize with A. Uetz and M. Moore regarding fact and expert witnesses needed for confirmation hearing and witnesses to be deposed (partial).	1.30	\$1,137.50
04/28/25	MRM	Analysis of discovery responses in preparation of document collection (4.2); analysis of Committee's motion for protective order against Debtor discovery requests (2.1).	6.30	\$4,252.50
04/28/25	TND	Further communications with RCBO priests regarding subpoenas served on them (2.1); review issues related to potentially misdirected subpoenas (.7); meeting on discovery process with Foley team (partial) (.8).	3.60	\$2,880.00
04/29/25	JCH	Prepare invites for prep meetings and deposition of Bishop Barber per instructions by A. Uetz.	0.50	\$165.00
04/29/25	JMT	Analyze discovery and track same for discovery responses.	3.20	\$2,800.00
04/29/25	KAFA	Prepare response to email from Nicolaides regarding "RCBO-CC" document production referenced in response to RPD-Set One.	0.80	\$360.00
04/29/25	MCM	Attention to discovery plan, email correspondence with Committee regarding discovery responses, and trial preparation for contested confirmation hearing.	0.80	\$740.00
04/29/25	MRM	Analysis of Committee's conferral email in connection with Debtor's discovery responses.	3.50	\$2,362.50
04/29/25	TND	Call and emails with priests on subpoenas.	0.50	\$400.00
04/30/25	AMUE	Multiple communications with M. Kemner and leadership regarding privileged matter concerning discovery (1.4); outline tasks associated with expected depositions (1.4).	2.80	\$2,940.00
04/30/25	JMT	Analyze prior productions and assess additional supplemental discovery that needs to take place to complete production (2.1); confer with team regarding supplemental production (.3).	2.40	\$2,100.00
04/30/25	KAFA	Coordination of QC review queues for additional documents for review and possible production (.3); gather documents and information requested by M. Thomas regarding parish records collection and collection of client email (1.7).	2.00	\$900.00

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04/30/25	MCM	Confer with litigation team regarding discovery and related matters.	0.40	\$370.00
04/30/25	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) and other RCWC counsel regarding discovery issues and potential need to stay state court proceedings.	0.70	\$612.50
04/30/25	MRL	Confer with M. Mitcham and M. Moore regarding drafting disposition outlines.	0.60	\$405.00
04/30/25	MRM	Strategize in connection with Debtor's production in response to Committee's discovery requests (1.0); draft deposition outlines in connection with Committee depositions (3.2).	4.20	\$2,835.00
Task Total:			324.70	\$260,437.00

035 General Counsel Matters

04/02/25	JS	Review and revise A102 and Exhibit A to A102 construction contracts.	0.90	\$189.00
04/03/25	JS	Revise A101 construction contract and insert alternative provisions.	1.00	\$210.00
04/03/25	JS	Revise A201 construction contract and insert alternative provisions.	1.60	\$336.00
04/03/25	MTKS	Draft form A101 construction contract.	0.50	\$287.50
04/03/25	MTKS	Draft form A201 construction contract.	1.00	\$575.00
04/04/25	MTKS	Draft form A201 construction contract.	0.70	\$402.50
04/07/25	JJK	Review question regarding Catholic Directory.	0.20	\$195.00
04/09/25	JJK	Conference with client regarding application for school.	0.60	\$585.00
04/10/25	JJK	Research regarding filing Form 928.	0.70	\$682.50
04/14/25	LFG	Update construction contracts for diocesan projects.	1.20	\$1,440.00
04/14/25	LPM	Prepare form A101 construction contract for client review.	0.90	\$733.50

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04/16/25	KAFA	Communications with R. Medeiros regarding privileged matter (.3); communications with L. Glahn regarding same (.3); review files for Bylaws/Policy (.6).	1.20	\$540.00
04/16/25	LFG	Work with K. Farrar and clients on policy review.	0.40	\$480.00
04/25/25	JJK	Review question on Holy Names Education Foundation (.4); draft e-mail (.3).	0.70	\$682.50
Task Total:			11.60	\$7,338.50

037 Financing

04/16/25	HMF	Conference with M. Lee regarding RCC financing.	0.40	\$440.00
04/16/25	MDL	Evaluate exit facility terms.	0.40	\$350.00
04/16/25	MDL	Telephone conference with D. Flanagan regarding exit facility collateral issue.	0.10	\$87.50
04/16/25	MDL	Strategize with H. Furlong regarding RCC exit facility documents.	0.50	\$437.50
04/17/25	HMF	Conference with J. Gordon (.4); review bankruptcy documents and existing credit documents (.6).	1.00	\$1,100.00
04/18/25	JWGO	Review plan and disclosure statement and other court filings (2.0); draft exit facility (2.8).	4.80	\$3,912.00
04/19/25	JWGO	Review docket filings (.5); draft exit financing (2.0).	2.50	\$2,037.50
04/20/25	JWGO	Review precedent financing documents (.6); revise financing agreement (2.9).	3.50	\$2,852.50
04/21/25	HMF	Review draft credit agreement (1.0); strategize with J. Gordon regarding same (.3).	1.30	\$1,430.00
04/21/25	JWGO	Revise financing documents.	2.30	\$1,874.50
04/23/25	HMF	Review revised draft credit agreement.	0.50	\$550.00
04/23/25	JWGO	Revise financing documents.	2.30	\$1,874.50
04/23/25	MDL	Revise RCC loan documents.	1.80	\$1,575.00
04/23/25	MDL	Finalize list of potential RCC collateral.	0.40	\$350.00

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04/23/25	MDL	Correspondence with R. Manns (Norton Rose Fulbright) regarding list of potential RCC collateral.	0.10	\$87.50
04/23/25	MDL	Strategize with H. Furlong and J. Gordon regarding RCC loan documents.	0.30	\$262.50
04/30/25	HMF	Review comments on draft loan agreement.	0.30	\$330.00
04/30/25	JWGO	Revise exit facility.	1.00	\$815.00
04/30/25	MDL	Correspondence with Hilco team regarding exit facility collateral appraisal work.	0.20	\$175.00
Task Total:			23.70	\$20,541.00

038 Mediation

04/02/25	ERR	Attend mediation session with insurers (1.0) and follow-up calls with insurers, Galloway regarding insurance issues (1.5).	2.50	\$2,750.00
04/02/25	MDL	Telephone conference with B. Weisenberg (Lowenstein) regarding confidential mediation subject.	0.40	\$350.00
04/02/25	MDL	Telephone conference with Judge Newsome regarding confidential mediation matter.	0.30	\$262.50
04/02/25	MDL	Meeting with mediators and insurer attorneys to discuss confidential mediation matters.	1.00	\$875.00
04/03/25	AMUE	Initial draft of letter to mediator regarding confidential mediation issue.	1.20	\$1,260.00
04/07/25	AMUE	Prepare for (.5) and attend (1.0) mediation meeting with mediators; debrief from meeting (.4).	1.90	\$1,995.00
04/07/25	ERR	Attend mediation with T. Gallagher.	1.00	\$1,100.00
04/07/25	MDL	Telephone conference with T. Gallagher regarding status of discussions with specific parties and individuals.	0.20	\$175.00
04/07/25	MDL	Participate in mediation session with insurers, Judge Newsome, and T. Gallagher.	1.00	\$875.00

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04/08/25	AMUE	Draft privileged mediation communication to mediator (1.1) and communication with client leadership regarding same (.5).	1.60	\$1,680.00
04/09/25	MDL	Revise letter to mediators regarding confidential mediation issue.	1.30	\$1,137.50
04/18/25	AMUE	Prepare for (.4) and attend (.6) insurance mediation.	1.00	\$1,050.00
04/18/25	ERR	Prepare for (.4) and attend (.6) remote mediation session with T. Gallagher and R. Newsome.	1.00	\$1,100.00
04/24/25	MDL	Telephone conference with Judge Newsome regarding confidential mediation issue.	0.20	\$175.00
04/25/25	MDL	Strategize regarding confidential insurance mediation issue.	0.40	\$350.00
04/28/25	MDL	Strategize regarding confidential insurance mediation issue.	0.20	\$175.00
04/30/25	MDL	Draft summary of potential settlement scenarios with Committee.	0.70	\$612.50
04/30/25	MDL	Evaluate potential terms of further insurance settlements.	0.10	\$87.50
Task Total:			16.00	\$16,010.00
Services Total:			860.50	\$698,272.00

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Alexander A. Witz	AAWT	Associate	16.20	\$525.00	\$8,505.00
Eloise R. Asfora	ERAS	Associate	13.90	\$550.00	\$7,645.00
Joseph S. Harper	JSH	Associate	2.00	\$800.00	\$1,600.00
Mason Roberts	MR	Associate	7.80	\$795.00	\$6,201.00
Mary Rofaeil	MRL	Associate	47.00	\$675.00	\$31,725.00
Mikaela R. Mitcham	MRM	Associate	77.00	\$675.00	\$51,975.00
Matthew Kass	MTKS	Associate	2.20	\$575.00	\$1,265.00
Michael W. Berg	MWBE	Associate	5.90	\$600.00	\$3,540.00
Nora McGuffey	NMCG	Associate	7.20	\$700.00	\$5,040.00
Shane J. Moses	SJM	Of Counsel	110.50	\$875.00	\$96,687.50

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Janelle C. Harrison	JCH	Paralegal	38.20	\$330.00	\$12,606.00
Kerry A. Farrar	KAFA	Paralegal	46.70	\$450.00	\$21,015.00
Ann Marie Uetz	AMUE	Partner	125.50	\$1,050.00	\$131,775.00
Emil P. Khatchatourian	EPK	Partner	20.70	\$875.00	\$18,112.50
Eileen R. Ridley	ERR	Partner	20.10	\$1,100.00	\$22,110.00
Geoffrey S. Goodman	GSG	Partner	6.80	\$1,050.00	\$7,140.00
Heidi M. Furlong	HMF	Partner	3.50	\$1,100.00	\$3,850.00
Jason J. Kohout	JKK	Partner	2.20	\$975.00	\$2,145.00
Jonathan Michael Thomas	JMT	Partner	71.50	\$875.00	\$62,562.50
Jeff R. Blease	JRBL	Partner	0.50	\$1,375.00	\$687.50
Lisa F. Glahn	LFG	Partner	2.00	\$1,200.00	\$2,400.00
Mark C. Moore	MCM	Partner	69.60	\$925.00	\$64,380.00
Matthew D. Lee	MDL	Partner	65.20	\$875.00	\$57,050.00
Thomas F. Carlucci	TFCA	Partner	0.70	\$1,375.00	\$962.50
Jacob Stamm	JS	Project Assistant	3.50	\$210.00	\$735.00
Elizabeth P. Mazzocco	EPM	Senior Counsel	24.70	\$840.00	\$20,748.00
Jake W. Gordon	JWGO	Senior Counsel	16.40	\$815.00	\$13,366.00
Laura P. Mikeworth	LPM	Senior Counsel	0.90	\$815.00	\$733.50
Mikle S-K Jew	MSKJ	Senior Counsel	1.20	\$825.00	\$990.00
Tamar N. Dolcourt	TND	Special Counsel	50.90	\$800.00	\$40,720.00
Totals			860.50		\$698,272.00

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$561.90
LSS - eDiscovery Services	\$3,900.00
Other Fees	\$50.00
Expenses Incurred Total	\$4,511.90

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.

Expense Detail

Electronic Legal Research Services

Date	Initials	Description	Amount
04/30/25	SJM	Docket Report. Westlaw. US TREATISES DOC ACCESS.	\$561.90

LSS - eDiscovery Services

Date	Initials	Description	Amount
04/30/25	JRBL	LSS - eDiscovery Services.	\$3,900.00

Other Fees

Date	Initials	Description	Amount
04/30/25	JMT	Certificate of Good Standing--VENDOR: Jonathan Michael Thomas 04/29/25 Pro Hac RCBO.	\$50.00

Expense Total:	\$4,511.90
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