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Counsel for the Official Committee of Unsecured Creditors

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

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

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

TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:

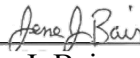
1 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP (“**Burns Bair**”), special insurance
2 counsel to The Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman
3 Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement
4 for the Period of July 1, 2025 through July 31, 2025 (the “**Monthly Fee Statement**”). Pursuant to
5 the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of
6 Professionals [Dkt. 170] (the “**Interim Fee Order**”)¹ entered by the Court on June 23, 2023, and
7 the Agreed Order Amending Procedures For Interim Compensation and Reimbursement of
8 Expenses of Professionals [Dkt. 2101] (the “**Amended Fee Order**”) entered by the Court on June
9 27, 2025, the total legal fees and costs expended by Burns Bair on account of the Committee is as
10 follows:

Period	Fees	Expenses	Total
July 1, 2025 through July 31, 2025	\$51,330.00	\$0	\$51,330.00
Net Total Allowed Payments this Statement Period: (70% of Fees and 100% of Costs)	\$35,931.00	\$0	\$35,931.00

15 The itemized billing statement for the fees and costs billed is attached hereto as **Exhibit**
16 **A**. Notice Parties have ten (10) days from the date of service of this Monthly Fee Statement to
17 file an objection thereto. If no objection is filed, Burns Bair may file a certificate of no objection
18 (or if an Objection was timely served, a certificate of partial objection) with the Court after which
19 the Debtor, without further order of the Court, shall pay Burns Bair an amount equal to the lesser
20 of: (1) 70% of the fees and 100% of the expenses requested in the Monthly Fee Statement, and
21 (2) if an Objection was served, 70% of the fees and 100% of the expenses to which there was no
22 Objection no later than five (5) business days after the filing of the relevant certificate.

23 Dated: August 29, 2025

BURNS BAIR LLP

24 By: 
25 Jesse J. Bair
26 *Special Insurance Counsel for the Official*
27 *Committee of Unsecured Creditors*

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

EXHIBIT A

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 8/26/2025

Bill # : 02004

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/10/2025	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case developments and strategy (.8);	0.80	\$896.00
7/17/2025	Timothy Burns	Participate in state court counsel meeting on insurance issues (1.1);	1.10	\$1,232.00
7/24/2025	Timothy Burns	Participate in state court counsel meeting re case insurance issues, strategy, and related developments (1.2);	1.20	\$1,344.00
7/25/2025	Timothy Burns	Prepare for (.2) and participate in Committee meeting for insurance purposes re case developments and strategy (1.1);	1.30	\$1,456.00
Totals for Committee Meetings			4.40	\$4,928.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/11/2025	Jesse Bair	Review and respond to correspondence with KBK re budget estimate requested by debtor (.1);	0.10	\$90.00
7/14/2025	Jesse Bair	Draft Burns Bair interim budget (.4); correspond with the Committee re same (.1);	0.50	\$450.00
7/28/2025	Jesse Bair	Review and edit monthly fee statement and correspond with KBK and B. Horn-Edwards re same (.2);	0.20	\$180.00
7/28/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and correspond with J. Bair re same (.3);	0.30	\$102.00
Totals for Fee Applications			1.10	\$822.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/16/2025	Nathan Kuenzi	Participate in hearing on renewed motion for lift stay (3.7);	3.70	\$2,035.00
7/16/2025	Timothy Burns	Participate in hearing on renewed motion to lift stay (3.7);	3.70	\$4,144.00
7/18/2025	Jesse Bair	Attend status conference for insurance purposes re potential confirmation adjournment and related issues (1.0);	1.00	\$900.00
Totals for Hearings			8.40	\$7,079.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/2/2025	Timothy Burns	Review memo re insurance strategy from state court counsel (.3); review and respond to correspondence with Committee professionals re same (.2);	0.50	\$560.00
7/2/2025	Timothy Burns	Conference with J. Prol re plan drafting and insurance strategy (.6);	0.60	\$672.00
7/2/2025	Jesse Bair	Review insurance memo from state court counsel re Plan issues and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
7/2/2025	Jesse Bair	Review insurance district court order requesting further status update (.1);	0.10	\$90.00
7/3/2025	Jesse Bair	Prepare for meeting with Committee professionals re case insurance issues and strategy (.2);	0.20	\$180.00
7/3/2025	Timothy Burns	Participate in call with state court counsel re mediation and insurance strategy (.2);	0.20	\$224.00
7/7/2025	Timothy Burns	Participate in call with Lowenstein and J. Bair re litigation strategy and insurance strategy (.7);	0.70	\$784.00
7/7/2025	Jesse Bair	Participate in call with Committee professionals re Plan insurance issues and ongoing case negotiations (.7);	0.70	\$630.00
7/7/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re insurance-related Plan objections (.1);	0.10	\$90.00
7/7/2025	Jesse Bair	Review revised insurance Plan memo and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
7/7/2025	Nathan Kuenzi	Analyze issues pending with respect to insurance aspects of Plan objection and correspond with Committee professionals re same (.2);	0.20	\$110.00
7/10/2025	Timothy Burns	Review Debtors' and Insurers' oppositions to renewed motion re lifting stay (.8);	0.80	\$896.00

7/11/2025	Jesse Bair	Review and respond to correspondence with Lowenstein re status update to Judge Corley in the insurance district court action (.1);	0.10	\$90.00
7/11/2025	Jesse Bair	Participate in conference with T. Burns re additional case developments, strategy, and next-steps re case litigation and settlement issues (.2);	0.20	\$180.00
7/11/2025	Timothy Burns	Participate in conference with J. Bair re case developments, mediation, and litigation strategy (.2);	0.20	\$224.00
7/11/2025	Timothy Burns	Review and respond to correspondence with Lowenstein re draft insurance status report (.2);	0.20	\$224.00
7/13/2025	Timothy Burns	Review multiple correspondence with Committee professionals and state court counsel re mediation and insurance strategy (.4); participate in call with B. Weisenberg re same (.3);	0.70	\$784.00
7/13/2025	Jesse Bair	Review various correspondence with state court counsel, the Committee, and Committee professionals re case developments, upcoming filings, and insurance Plan issues (.3);	0.30	\$270.00
7/14/2025	Timothy Burns	Review lift stay reply and respond to related correspondence re same (.3);	0.30	\$336.00
7/14/2025	Jesse Bair	Review the debtor's opposition to the Committee's renewed motion to lift stay (.2); review certain insurers' opposition to same (.2); review Pacific's opposition to same (.2); review and edit the Committee's reply in support of same (.4);	1.00	\$900.00
7/14/2025	Jesse Bair	Review correspondence with the debtor and Committee professionals re ongoing settlement negotiations (.1);	0.10	\$90.00
7/14/2025	Jesse Bair	Prepare for upcoming Committee and state court counsel meetings re case developments and related insurance issues (.2);	0.20	\$180.00
7/14/2025	Timothy Burns	Prepare memo re insurance strategy in preparation for state court counsel meeting (.8);	0.80	\$896.00
7/15/2025	Nathan Kuenzi	Analyze filings in preparation for upcoming hearing on lift stay motion (.6);	0.60	\$330.00
7/16/2025	Timothy Burns	Participate in call with Lowenstein re stay relief hearing and case strategy (.9);	0.90	\$1,008.00
7/16/2025	Timothy Burns	Participate in call with state court counsel re stay relief hearing and case strategy (.2); participate in additional conference with Lowenstein re same (.2);	0.40	\$448.00

7/16/2025	Brian Cawley	Draft summary of Diocesan lift stay cases nationwide in preparation for hearing on renewed lift stay motion (1.1);	1.10	\$605.00
7/16/2025	Nathan Kuenzi	Analyze aggregate limits of coverage (and non-applicability of said aggregates to sexual abuse claims) in various RCBO insurance policies in preparation for lift stay hearing (1.2);	1.20	\$660.00
7/16/2025	Timothy Burns	Prepare for hearing on renewed motion to lift stay (1.9);	1.90	\$2,128.00
7/16/2025	Jesse Bair	Correspond with Committee professionals re preparations for lift stay hearing and revise related analysis in connection with same (.2);	0.20	\$180.00
7/17/2025	Timothy Burns	Prepare for state court counsel meeting on insurance issues (1.2);	1.20	\$1,344.00
7/17/2025	Timothy Burns	Participate in conference with B. Weisenberg re case insurance issues, state court counsel meeting re same, and hearing outcome (.6);	0.60	\$672.00
7/17/2025	Timothy Burns	Participate in call with J. Prol and J. Bair re mediation, confirmation, and insurance issues (.4);	0.40	\$448.00
7/17/2025	Karen Dempksi	Docket/calendar continued hearing re confirmation (.1);	0.10	\$34.00
7/17/2025	Jesse Bair	Review proposed order lifting stay and related correspondence with the insurers re same (.1);	0.10	\$90.00
7/17/2025	Jesse Bair	Prepare for upcoming status hearing (.2);	0.20	\$180.00
7/17/2025	Jesse Bair	Review correspondence from the debtor re ongoing negotiations (.1);	0.10	\$90.00
7/17/2025	Jesse Bair	Participate in portion of call with J. Prol and T. Burns re hearing outcome, case developments, and next-steps (.2);	0.20	\$180.00
7/17/2025	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$90.00
7/18/2025	Jesse Bair	Review and respond to correspondence with state court counsel re lift stay insurance issues (.1);	0.10	\$90.00
7/18/2025	Jesse Bair	Review the debtor's motion to continue the confirmation hearing and Pacific's response to same (.2);	0.20	\$180.00
7/21/2025	Karen Dempksi	Docket/calendar status conferences (.1);	0.10	\$34.00
7/21/2025	Jesse Bair	Participate in call with Lowenstein re case status, strategy, negotiations, and next-steps (.3);	0.30	\$270.00
7/22/2025	Timothy Burns	Participate in call with Committee professionals re lift stay issues (.2);	0.20	\$224.00
7/22/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re case insurance strategy (.1);	0.10	\$90.00

7/23/2025	Jesse Bair	Review correspondence with Committee professionals and state court counsel re case insurance issues and lift stay (.2);	0.20	\$180.00
7/23/2025	Nathan Kuenzi	Analyze insurance allocation numbers in connection with ongoing case insurance issues (.8);	0.80	\$440.00
7/23/2025	Timothy Burns	Review and respond to correspondence with B. Weisenberg re insurance adversary and case strategy (.2);	0.20	\$224.00
7/23/2025	Timothy Burns	Participate in conference with B. Weisenberg re upcoming insurance-related motions and reports (.2);	0.20	\$224.00
7/24/2025	Timothy Burns	Prepare for state court counsel meeting re case insurance issues (.7);	0.70	\$784.00
7/24/2025	Timothy Burns	Participate in call with Lowenstein re mediation and case strategy (.5);	0.50	\$560.00
7/24/2025	Nathan Kuenzi	Analyze insurance issues involving potential approaches to plans of reorganization in preparation for meeting with state court counsel (2.2);	2.20	\$1,210.00
7/24/2025	Jesse Bair	Review memo re insurance Plan issue and potential structure (.3);	0.30	\$270.00
7/25/2025	Jesse Bair	Participate in conference with Committee professionals re case insurance issues and strategy (1.1);	1.10	\$990.00
7/25/2025	Jesse Bair	Provide instructions re preparing Committee insert to joint status report in the district court insurance action (.2);	0.20	\$180.00
7/25/2025	Jesse Bair	Correspond with the debtor and insurers re insurance joint status report (.1);	0.10	\$90.00
7/25/2025	Nathan Kuenzi	Participate in conference with Committee professionals re case insurance issues and next-steps (1.1);	1.10	\$605.00
7/25/2025	Timothy Burns	Participate in conference with Committee professionals re case insurance issues and strategy (1.1);	1.10	\$1,232.00
7/25/2025	Timothy Burns	Review various correspondence with state court counsel re case insurance issues (.4);	0.40	\$448.00
7/25/2025	Alexander Castro	Research CA law on 11580 assignee issues in connection with insurance Plan structures (1.2);	1.20	\$564.00
7/27/2025	Jesse Bair	Review Order granting the Committee's renewed motion to lift the stay and related correspondence with state court counsel and Committee professionals re same (.2);	0.20	\$180.00
7/28/2025	Jesse Bair	Correspond with state court counsel re lift stay case developments and insurance issues (.1);	0.10	\$90.00

7/28/2025	Jesse Bair	Review the debtor/insurers' draft status report in the district court insurance action (.4); draft revised Committee insert to same (.6); review and respond to correspondence with Committee professionals re same (.2);	1.20	\$1,080.00
7/28/2025	Nathan Kuenzi	Draft initial version of Committee section of joint status report in the insurance adversary proceeding, including review of transcripts of prior hearings on motion to hold case in abeyance (2.9);	2.90	\$1,595.00
7/28/2025	Nathan Kuenzi	Review the insurers' draft of Joint Status Report (.6);	0.60	\$330.00
7/28/2025	Timothy Burns	Participate in call with state court counsel re insurance strategy issues (.3);	0.30	\$336.00
7/28/2025	Alexander Castro	Finish researching CA law on 11580 assignee issues in connection with insurance Plan structures and draft memo summarizing same (1.9);	1.90	\$893.00
7/28/2025	Timothy Burns	Review and revise status report insert and status report (.4); review and respond to related correspondence with parties (.2);	0.60	\$672.00
7/29/2025	Nathan Kuenzi	Draft Committee's revisions to RCBO/Insurer Joint Status Report and review and respond to correspondence with parties re same and negotiation of final language (2.1);	2.10	\$1,155.00
7/29/2025	Timothy Burns	Review and edit further revised version of joint insurance status report (.5); review and respond to correspondence with parties re same (.2);	0.70	\$784.00
7/29/2025	Timothy Burns	Revise insurance strategy proposal memo (1.2);	1.20	\$1,344.00
7/29/2025	Timothy Burns	Review and respond to correspondence from insurer re changes to status report (.2);	0.20	\$224.00
7/29/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re potential revisions to Committee status report insert (.2); edit and revise the Committee's status report insert (.2); correspond with the debtor and insurers re same (.1); review the debtor's proposed edits to the joint status report (.2); review the insurers' additional proposed edits (.1); review and respond to additional correspondence with the debtor, insurers, and Committee professionals re same and finalization of submission (.2);	1.00	\$900.00
7/30/2025	Nathan Kuenzi	Analyze Westport letter to Judge Lafferty and draft response to the same (.8);	0.80	\$440.00
7/30/2025	Timothy Burns	Review Westport's request re mediation and provide instructions re preparing response to same (.2); participate in call with B. Weisenberg re same (.1); participate in call with state court counsel re same (.1);	0.40	\$448.00

7/30/2025 Timothy Burns	Review and revise draft letter to court re mediation (.2); review and respond to correspondence with Committee professionals re same (.2);	0.40	\$448.00
7/30/2025 Jesse Bair	Review Westport letter to Court re appointment of mediator and edit Committee draft response to same (.2);	0.20	\$180.00
7/31/2025 Timothy Burns	Review A. Castro's research summary re insurance assignability issues in connection with potential Plan structures (.2);	0.20	\$224.00
7/31/2025 Timothy Burns	Participate in call with state court counsel re lift stay cases (.2); review related correspondence re same (.2);	0.40	\$448.00
7/31/2025 Jesse Bair	Analyze insurance issues in connection with lift stay cases (.3); review correspondence with state court counsel re lift stay developments (.1);	0.40	\$360.00
7/31/2025 Timothy Burns	Review and respond to correspondence with B. Weisenberg re court filing re mediation (.2);	0.20	\$224.00
Totals for Insurance Recovery Activities		45.20	\$38,501.00
Total Hours and Fees		59.10	\$51,330.00

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	3.10	\$470.00	\$1,457.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	1.10	\$550.00	\$605.00
Jesse Bair	Partner	11.80	\$900.00	\$10,620.00
Karen Dempsey	Paralegal	0.20	\$340.00	\$68.00
Nathan Kuenzi	Associate	16.20	\$550.00	\$8,910.00
Timothy Burns	Partner	26.40	\$1,120.00	\$29,568.00

Total Due This Invoice: \$51,330.00