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17 *Counsel for the Official Committee of Unsecured Creditors*

18
 19 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
 20 **OAKLAND DIVISION**

21 <i>In re:</i>	Case No. 23-40523 WJL
22 THE ROMAN CATHOLIC BISHOP OF	Chapter 11
23 OAKLAND, a California corporation sole,	
24 Debtor.	MONTHLY PROFESSIONAL FEE
	STATEMENT FOR BURNS BAIR LLP
	[NOVEMBER 2025]

26 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

27 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP (“**Burns Bair**”), special insurance
 28 counsel to The Official Committee of Unsecured Creditors (the “Committee”) of The Roman



1 Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement
2 for the Period of November 1, 2025 through November 30, 2025 (the “**Monthly Fee Statement**”).
3 Pursuant to the Order Authorizing Procedures for Interim Compensation and Reimbursement of
4 Expenses of Professionals [Dkt. 170] (the “**Interim Fee Order**”)¹ entered by the Court on June
5 23, 2023, the total legal fees and costs expended by Burns Bair on account of the Committee is as
6 follows:

7 Period	Fees	Expenses	Total
8 November 1, 2025 through November 30, 2025	\$48,571.00	\$0	\$48,571.00
9 Net Total Allowed Payments this Statement 10 Period: (80% of Fees and 100% of Costs)	\$38,856.80	\$0	\$38,856.80

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

19 Dated: December 30, 2025

BURNS BAIR LLP

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

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

EXHIBIT A

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 12/29/2025

Bill # : 02102

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/4/2025	Timothy Burns	Participate in state court counsel meeting re dismissal issues and ongoing negotiations (.3);	0.30	\$336.00
11/4/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case status, strategy, and next-steps (.3);	0.30	\$270.00
11/10/2025	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re case developments and strategy (.5); participate in call with B. Wiesenbergs re outcome of Committee meeting and next-steps (.1);	0.60	\$540.00
11/14/2025	Timothy Burns	Participate in Committee meeting re case developments, strategy, and next-steps (.9);	0.90	\$1,008.00
11/14/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments, insurance Plan issues, strategy and next-steps (.8);	0.80	\$720.00
11/14/2025	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case development, Plan issues, and negotiations (.8);	0.80	\$896.00
11/14/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, strategy and next-steps (.9);	0.90	\$810.00
11/24/2025	Timothy Burns	Participate in Committee meeting for insurance purposes re mediation negotiations (.4);	0.40	\$448.00
11/24/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, negotiations, and strategy (.4);	0.40	\$360.00

Totals for Committee Meetings 5.40 \$5,388.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/30/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and correspond with J. Bair re same (.3);	0.30	\$102.00
Totals for Fee Applications			0.30	\$102.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/12/2025	Jesse Bair	Participate in motion to dismiss status conference for insurance purposes (1.2);	1.20	\$1,080.00
11/21/2025	Jesse Bair	Prepare for status hearing (.2); participate in status hearing for insurance purposes re negotiation developments and motion to dismiss issues (.7);	0.90	\$810.00
Totals for Hearings			2.10	\$1,890.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/1/2025	Timothy Burns	Begin preparing for lift stay appeal oral argument (1.3);	1.30	\$1,456.00
11/2/2025	Jesse Bair	Correspond with Westport re potential joint submission to district court (.1);	0.10	\$90.00
11/2/2025	Timothy Burns	Finish detailed preparations for lift stay appeal oral argument, including reviewing all briefing, relevant case law, and applicable transcripts from earlier arguments / hearings (7.3);	7.30	\$8,176.00
11/3/2025	Timothy Burns	Participate in call with Lowenstein re mediation issues (.2); participate in call with state court counsel re same (.2);	0.40	\$448.00
11/3/2025	Erin Quick	Analyze Insurers' reply brief re lift stay order (1.5);	1.50	\$825.00
11/3/2025	Jesse Bair	Review stipulation to extend discovery in the insurance district court action and correspondence with Committee professionals re same (.2); review docket entry re cancellation of lift stay oral argument, notice of filing of motion to dismiss transcripts, and related correspondence with Committee professionals and Westport re same (.2);	0.40	\$360.00
11/3/2025	Timothy Burns	Review correspondence with Committee professionals re stay appeal hearing (.2);	0.20	\$224.00
11/4/2025	Timothy Burns	Participate in additional call with state court counsel re insurance strategy and case next-steps (.2);	0.20	\$224.00

11/4/2025	Karen DempSKI	Docket/calendar updated discovery dispute deadlines in the 709 matter (.1);	0.10	\$34.00
11/6/2025	Timothy Burns	Correspondence with Lowenstein re status hearing, dismissal, and mediation (.2);	0.20	\$224.00
11/6/2025	Jesse Bair	Review correspondence with Committee professionals re case developments and upcoming status conference (.1);	0.10	\$90.00
11/7/2025	Jesse Bair	Participate in conference with Lowenstein re case developments, next-steps, and upcoming status conference (.4);	0.40	\$360.00
11/9/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re mediation, strategy, and upcoming Committee meeting (.3);	0.30	\$336.00
11/11/2025	Nathan Kuenzi	Draft revised summary re various case negotiations and developments in connection with upcoming status conference and ongoing negotiations (.9);	0.90	\$495.00
11/11/2025	Jesse Bair	Review debtor's conference statement and conference with Committee professionals re same and next-steps (.2);	0.20	\$180.00
11/12/2025	Jesse Bair	Participate in calls with T. Burns re case developments, status conference issues, and outcome of same (.4);	0.40	\$360.00
11/12/2025	Timothy Burns	Participate in various conferences re case developments and strategy, including call with Committee professionals re case developments, upcoming hearing, and conference with the mediator (.3); conference with the mediator and Committee professionals re same (.4); additional call with Committee professionals re outcome of mediator call and next-steps (.4); call with J. Bair re outcome of motion to dismiss status hearing (.4); calls with state court counsel re case next-steps and related strategy (.5);	2.00	\$2,240.00
11/12/2025	Jesse Bair	Participate in call with Committee professionals re case developments and preparations for motion to dismiss status conference (.3); participate in Zoom conference with mediator re case negotiations and status (.4); participate in second call with Committee professionals re outcome of mediator call, next-steps, and upcoming status conference (.4);	1.10	\$990.00
11/13/2025	Jesse Bair	Participate in call with state court counsel re case developments and next-steps (.3);	0.30	\$270.00

11/13/2025	Jesse Bair	Review and respond to correspondence with Committee professionals, state court counsel, and the Committee re case negotiations, hearing outcome, and next-steps (.2);	0.20	\$180.00
11/14/2025	Timothy Burns	Prepare for state court counsel and Committee meetings (.4);	0.40	\$448.00
11/14/2025	Nathan Kuenzi	Review original Committee insurance term sheet in connection with ongoing negotiations (.3);	0.30	\$165.00
11/14/2025	Timothy Burns	Conference with J. Prol re mediation issues (.2);	0.20	\$224.00
11/14/2025	Jesse Bair	Formulate revised carrier exposure assessment for use with ongoing insurance negotiations (.3); review and respond to correspondence with state court counsel re same and insurance Plan issues (.3);	0.60	\$540.00
11/14/2025	Timothy Burns	Participate in call with B. Weisenberg re next-steps in light of state court counsel and Committee meetings (.2);	0.20	\$224.00
11/14/2025	Timothy Burns	Review revised carrier allocation assessment (.2);	0.20	\$224.00
11/15/2025	Timothy Burns	Participate in call with J. Bair re outcome of mediation conference with debtor (.3)	0.30	\$336.00
11/15/2025	Timothy Burns	Prepare for mediation session with Debtor, Lowenstein, and state court counsel (.4);	0.40	\$448.00
11/15/2025	Timothy Burns	Participate in mediation session with Debtor, Lowenstein, and state court counsel (1.3);	1.30	\$1,456.00
11/15/2025	Jesse Bair	Participate in conference with T. Burns re outcome of mediation call, ongoing negotiations, and strategy re next-steps (.3);	0.30	\$270.00
11/15/2025	Timothy Burns	Participate in call with J. Prol re mediation developments (.4);	0.40	\$448.00
11/16/2025	Timothy Burns	Conferences with Debtor's counsel re mediation issues (.5);	0.50	\$560.00
11/16/2025	Timothy Burns	Participate in call with state court counsel re mediation developments (.2);	0.20	\$224.00
11/17/2025	Timothy Burns	Conference with J. Bair re mediation and insurance Plan issues (.2);	0.20	\$224.00
11/17/2025	Timothy Burns	Review and analysis of state court counsel memo re insurance Plan issues and N. Kuenzi assessment re same (.6); review and respond to correspondence with state court counsel re same (.4);	1.00	\$1,120.00
11/17/2025	Jesse Bair	Participate in call with T. Burns re mediation developments, Plan issues, and ongoing negotiations (.2); review related correspondence with Committee professionals and state court counsel re same (.2);	0.40	\$360.00

11/17/2025	Nathan Kuenzi	Analyze insurance Plan structure memo from state court counsel and draft assessment re same, including comparison with prior Committee term sheet and insurance proposals (1.8);	1.80	\$990.00
11/17/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation issues (.2); participate in calls with state court counsel re same (.3);	0.50	\$560.00
11/17/2025	Timothy Burns	Review and respond to correspondence with state court counsel re mediation issues (.3);	0.30	\$336.00
11/18/2025	Jesse Bair	Participate in conferences with Committee professionals re insurance Plan issues and ongoing negotiations (.2);	0.20	\$180.00
11/18/2025	Timothy Burns	Participate in call with state court counsel re insurance Plan issues and structure (.5);	0.50	\$560.00
11/18/2025	Nathan Kuenzi	Participate in call with state court counsel re insurance Plan issues (.5);	0.50	\$275.00
11/19/2025	Jesse Bair	Correspond with state court counsel re Plan insurance meeting (.1);	0.10	\$90.00
11/20/2025	Timothy Burns	Participate in call with J. Prol re ongoing mediation issues and developments (.2);	0.20	\$224.00
11/20/2025	Nathan Kuenzi	Draft summary re current status of insurance Plan structure proposals (.4);	0.40	\$220.00
11/20/2025	Jesse Bair	Review the debtor's submission re motion to dismiss status conference order (.1);	0.10	\$90.00
11/20/2025	Jesse Bair	Review state court counsel insurance memo (.2); participate in call with state court counsel re same and insurance Plan issues and structure (.7);	0.90	\$810.00
11/21/2025	Jesse Bair	Review the Committee's response to the debtor's status conference statement (.1);	0.10	\$90.00
11/21/2025	Nathan Kuenzi	Draft revised summary re status of mediation negotiations and Plan issues and outstanding issues in connection with same (.9);	0.90	\$495.00
11/21/2025	Jesse Bair	Review and edit revised version of memo re insurance Plan structure issues (.2);	0.20	\$180.00
11/21/2025	Timothy Burns	Correspond with Debtor's counsel re mediation issues (.1); review revised insurer exposure assessments figures (.2); conference with Lowenstein re mediation developments and strategy (.2);	0.50	\$560.00
11/21/2025	Jesse Bair	Review correspondence with Committee professionals, the Committee, and state court counsel re hearing outcome, next-steps, and ongoing negotiations (.2);	0.20	\$180.00
11/21/2025	Karen DempSKI	Docket/calendar status conference hearing (.1);	0.10	\$34.00

11/21/2025	Jesse Bair	Participate in calls with Committee professionals re hearing outcome, next-steps, and overall case strategy (.4); correspond with T. Burns re insurance exposure assessments (.1);	0.50	\$450.00
11/21/2025	Timothy Burns	Review B. Weisenberg correspondence re mediation and dismissal issues (.2);	0.20	\$224.00
11/22/2025	Timothy Burns	Review case insurance materials in preparation for call with Debtor's counsel re mediation negotiations (.8);	0.80	\$896.00
11/22/2025	Timothy Burns	Participate in conference with Debtor's counsel re mediation negotiations and case insurance issues (.8);	0.80	\$896.00
11/22/2025	Timothy Burns	Conference with B. Weisenberg re mediation developments (.2);	0.20	\$224.00
11/23/2025	Timothy Burns	Draft memo to file re mediation insurance issues (.9);	0.90	\$1,008.00
11/23/2025	Nathan Kuenzi	Review correspondence from T. Burns, review records of demand letters, and draft response (.5);	0.50	\$275.00
11/23/2025	Timothy Burns	Participate in call with B. Weisenberg re insurance mediation issues (.2);	0.20	\$224.00
11/23/2025	Jesse Bair	Review correspondence with Committee professionals re negotiation status and developments (.2);	0.20	\$180.00
11/24/2025	Jesse Bair	Participate in call with mediator and review related correspondence re insurance negotiations (.2); participate in call with Lowenstein re ongoing case developments (.1);	0.30	\$270.00
11/24/2025	Jesse Bair	Review and respond to correspondence with state court counsel re insurance Plan issues and structure (.2);	0.20	\$180.00
11/24/2025	Timothy Burns	Review correspondence with state court counsel re insurance assignment issues (.2); analysis re potential Plan modifications in connection with same (.2); conference with state court counsel re same (.1);	0.50	\$560.00
11/24/2025	Nathan Kuenzi	Review revised draft term sheet (.3);	0.30	\$165.00
11/24/2025	Timothy Burns	Review and respond to correspondence with mediators and Committee professionals re ongoing mediation issues (.4);	0.40	\$448.00
11/26/2025	Timothy Burns	Conference with state court counsel re mediators' term sheet (.2); conference with B. Weisenberg re same and additional mediation issues (.2);	0.40	\$448.00
11/26/2025	Timothy Burns	Brief review re mediators' term sheet (.3); correspondence with B. Weisenberg re same (.2);	0.50	\$560.00

11/26/2025 Timothy Burns	Review correspondence with mediator and Lowenstein re mediation and dismissal Order (.1);	0.10	\$112.00
11/26/2025 Timothy Burns	Review and respond to correspondence with state court counsel and Committee professionals re mediation issues (.2);	0.20	\$224.00
11/26/2025 Nathan Kuenzi	Analyze insurance assignment language present in confirmed Diocesan plans, summarize relevant provisions, and prepare overview regarding essential terms for use in connection with ongoing negotiations (2.6);	2.60	\$1,430.00
11/26/2025 Jesse Bair	Participate in call with state court counsel and Committee professionals re mediator's term sheet, next-steps, and response to same (.4); review various correspondence with the mediators, state court counsel, and the Committee re same (.2);	0.60	\$540.00
11/26/2025 Jesse Bair	Analyze mediator's proposed term sheet, including review of Madison Square Plan and Third Amended RCBO Plan in connection with relevant insurance provisions (1.3);	1.30	\$1,170.00
Totals for Insurance Recovery Activities		43.70	\$41,191.00

Total Hours and Fees	51.50	\$48,571.00
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Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Erin Quick	Associate	1.50	\$550.00	\$825.00
Jesse Bair	Partner	14.50	\$900.00	\$13,050.00
Karen Dempski	Paralegal	0.20	\$340.00	\$68.00
Nathan Kuenzi	Associate	8.20	\$550.00	\$4,510.00
Timothy Burns	Partner	26.80	\$1,120.00	\$30,016.00

Total Due This Invoice: \$48,571.00