

FOLEY & LARDNER LLP

Eileen R. Ridley (CA Bar No. 151735)
Tel: (415) 438-6469; eridley@foley.com
Shane J. Moses (CA Bar No. 250533)
Tel: (415) 438-6404; smoses@foley.com
Ann Marie Uetz (admitted *pro hac vice*)
Tel: (313) 234-7114; auetz@foley.com
Matthew D. Lee (admitted *pro hac vice*)
Tel: (608) 258-4203; mdlee@foley.com
Geoffrey S. Goodman (admitted *pro hac vice*)
Tel: (312) 832-4515; ggoodman@foley.com
Mark C. Moore (admitted *pro hac vice*)
Tel: (214) 999-4150; mmoore@foley.com
One Market Plaza
55 Spear Street Tower, Suite 1900
San Francisco, CA 94105

*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

Chapter 11

**DECLARATION OF DANIEL FLANAGAN IN
SUPPORT OF DEBTOR’S MOTION TO
AMEND ORDER ESTABLISHING
PROCEDURES FOR INTERIM
COMPENSATION AND REIMBURSEMENT
OF EXPENSES OF PROFESSIONALS**

Judge: Hon. William J. Lafferty

Date: February 4, 2026
Time: 10:30 a.m.
Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

1 I, Daniel Flanagan, hereby declare as follows:

2 1. I am a Principal with VeraCruz Advisory, LLC, one of the financial advisors for Debtor
3 the Roman Catholic Bishop of Oakland (“the Debtor” or “RCBO”). I make this declaration in support of
4 the *Debtor’s Motion to Amend Order Establishing Procedures for Interim Compensation and*
5 *Reimbursement of Expenses of Professionals*, filed concurrently herewith (the “Motion”).¹

6 2. I am familiar with the Debtor’s day-to-day operations, financial affairs, and books and
7 records. Except as otherwise noted, all facts set forth in this Declaration are based upon my personal
8 knowledge. If called upon to testify, I could and would testify competently to the facts set forth herein.

9 3. The Debtor historically operates at approximately a break-even point excluding
10 bankruptcy-related professional fees and expenses. The Debtor’s longstanding business practice has been
11 to maintain a minimum unrestricted cash balance of approximately \$3.0 million. This liquidity threshold
12 represents an average of approximately two months of unrestricted expenses, which enables the Debtor to
13 timely pay its operating expenses in the ordinary course of business.

14 4. The Debtor dipped below this threshold in June and July 2025 due to the spike in
15 professional fees during that period, and the Debtor therefore drew on the remaining funds in the Long
16 Term Care (LTC) account as well as the Priest Supplemental Retirement Plan (SERP) to pull its liquidity
17 back above the \$3.0 million level.

18 5. The Debtor recently updated its cash forecast based on the foregoing circumstances and
19 assuming payment of the Monthly Fee Statements for November 2025 fees and expenses and 75% of the
20 amounts allowed in the Seventh Interim Order authorizing payment of approximately \$4.7 million in
21 professional fee holdbacks, as described in the Motion. This updated cash forecast through March 2026 is
22 attached hereto as **Exhibit A** (the “Cash Forecast”).

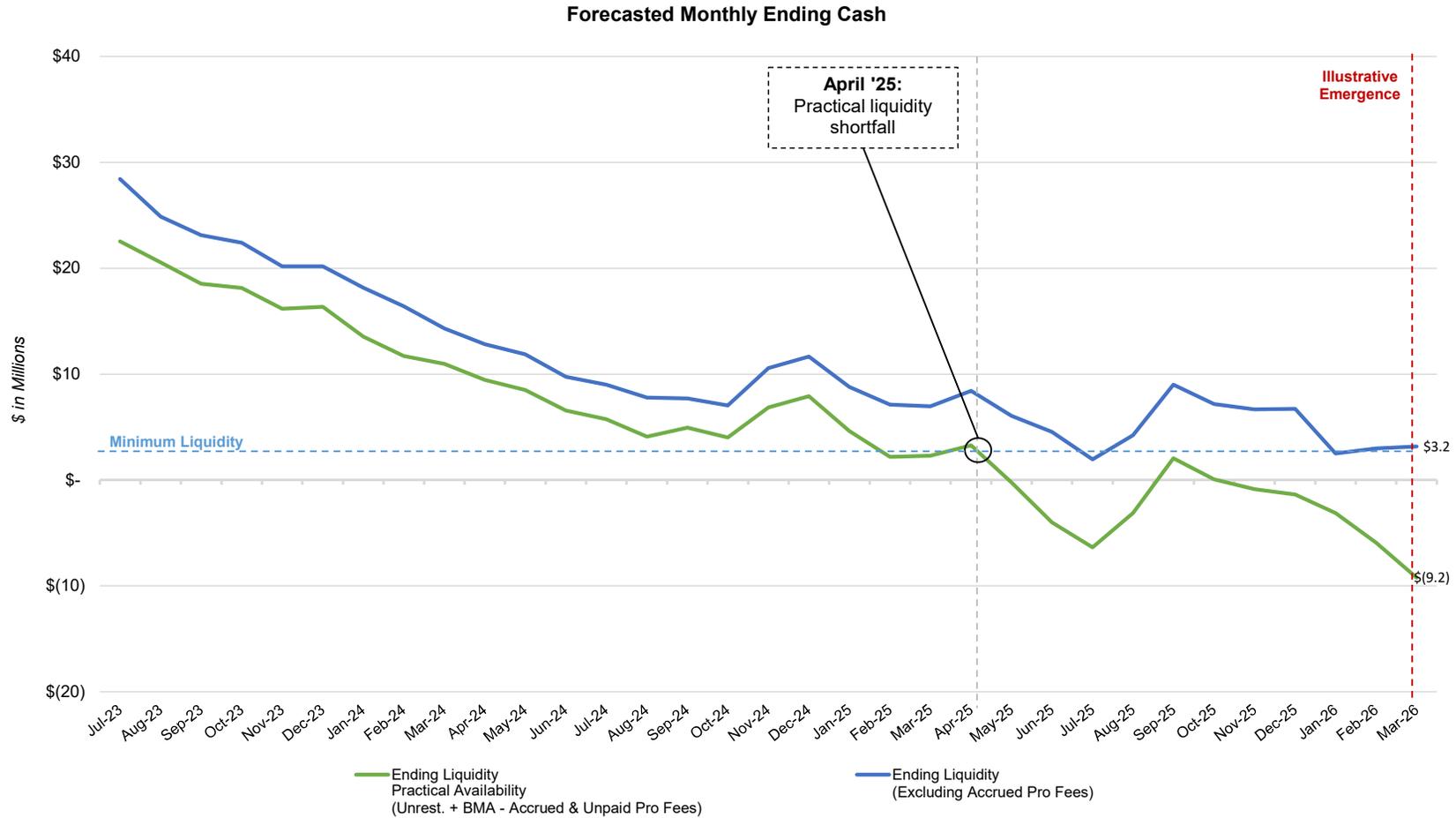
23 6. The updates in this Cash Forecast are due to Debtor’s expectation that it will file a fourth
24 amended plan of reorganization, as well as the Debtor’s current and anticipated financial position,
25 depletion of the cash reserves set aside for payment of expenses of the Chapter 11 Case, depletion of
26 remaining sources of short-term liquidity, the desire to preserve proceeds from real estate sales to fund
27

28 ¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

EXHIBIT A

Project Sole

Forecasted Monthly Ending Cash - Total, Restricted, Unrestricted, and Practical Liquidity



Project Sole
Consolidated Unrestricted Accounts Cash Forecast

(\$ in Millions)	Actuals	Forecast	Forecast	Forecast	Forecast										
	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Receipts															
Parish Assessment	\$ 0.4	\$ 0.4	\$ 1.4	\$ 0.8	\$ 0.5	\$ 0.3	\$ 1.0	\$ 0.3	\$ 0.4	\$ 0.6	\$ 0.4	\$ 0.8	\$ 0.4	\$ 0.6	\$ 0.7
Bishop's Annual Appeal	-	0.0	0.3	-	-	-	1.9	-	0.0	0.7	0.2	-	-	-	-
Gifts & Grants	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.2	0.0	-	-	-	-
CTN Grant	-	-	0.5	-	-	0.2	-	-	0.5	0.3	-	0.7	-	-	0.5
CMS Contribution	-	-	-	-	-	-	-	0.3	3.2	0.1	0.1	0.1	0.1	0.1	0.1
Ministry Departmental Revenue	0.0	0.2	0.1	0.1	0.1	0.0	0.1	0.0	0.0	0.1	0.1	-	-	-	-
Cemetery Rent	0.0	0.1	0.1	0.7	0.5	0.2	0.3	0.2	0.3	0.2	0.3	0.0	0.2	0.2	0.2
Other Rent	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0	0.0
Workers' Comp (Reimbursement)	-	-	-	-	-	-	0.0	-	-	-	-	-	-	-	-
Package Insurance (Reimbursement)	-	-	0.0	-	-	-	-	-	-	-	-	-	-	-	-
Health Insurance & Related (Reimbursement)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	-	-	-	-	-
Parochial Fund Management Fee	-	-	-	-	-	-	-	-	-	-	-	-	0.7	0.1	0.1
Other Receipts	0.0	0.0	0.0	0.1	0.0	0.0	0.1	0.1	0.2	0.4	(0.1)	-	(0.0)	(0.1)	(0.0)
Subtotal Receipts	\$ 0.6	\$ 0.7	\$ 2.6	\$ 1.7	\$ 1.1	\$ 0.8	\$ 3.4	\$ 1.0	\$ 4.8	\$ 2.6	\$ 1.1	\$ 1.6	\$ 1.5	\$ 1.0	\$ 1.6
Disbursements															
Payroll (Salaries & Taxes)	\$ (0.4)	\$ (0.5)	\$ (0.4)	\$ (0.4)	\$ (0.5)	\$ (0.4)	\$ (0.5)	\$ (0.4)	\$ (0.4)	\$ (0.5)	\$ (0.4)	\$ (0.5)	\$ (0.5)	\$ (0.5)	\$ (0.5)
Payroll (Vendors)	(0.0)	(0.0)	(0.0)	-	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	-	-	(0.0)
Professional Fees & Contractors	(0.2)	(0.2)	(0.2)	(0.1)	(0.2)	(0.2)	(0.2)	(0.1)	(0.2)	(0.2)	(0.2)	(0.4)	(0.2)	(0.2)	(0.2)
Bishop's Appeal Rebate	-	(0.2)	(0.1)	-	-	-	-	-	-	-	-	-	-	-	-
Facilities - Cathedral	(0.8)	(0.0)	-	(0.9)	-	-	(0.7)	-	-	(1.1)	-	-	(0.3)	(0.3)	(0.3)
Facilities - Other	(0.0)	(0.0)	(0.0)	(0.1)	(0.0)	(0.0)	(0.0)	(0.0)	(0.1)	(0.1)	(0.1)	(0.1)	(0.0)	(0.0)	(0.0)
Workers' Comp (Direct Pmt)	(0.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Package Insurance (Direct Pmt)	(0.0)	-	(0.0)	-	(0.0)	-	(0.0)	-	0.0	-	0.2	-	-	-	-
Health Insurance & Related (Direct Pmt)	-	-	-	-	-	(0.0)	-	-	(0.0)	(0.0)	(0.0)	-	-	-	-
Clergy Retirement	(0.0)	(0.1)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.7)	(0.3)	(0.5)	(0.0)	(0.0)	(0.3)
Other Clergy Costs	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.2)	(0.0)	(0.0)	(0.0)
Postage & Printing	(0.0)	(0.0)	(0.0)	(0.1)	(0.1)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.1)	(0.0)	(0.0)	(0.0)
Program, Ministry & Other	(0.4)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	-	-	-
Other Mission Related	(0.0)	(0.1)	(0.0)	(0.1)	(0.2)	(0.0)	(0.0)	(0.1)	(0.1)	(0.1)	(0.1)	(0.0)	(0.1)	(0.3)	(0.0)
Second Collections (Pass-through) - Pmt	(0.0)	(0.0)	-	-	(0.0)	-	-	-	-	-	0.1	-	-	-	-
Subtotal Operating Disbursements	\$ (2.0)	\$ (1.2)	\$ (0.9)	\$ (1.9)	\$ (1.2)	\$ (0.9)	\$ (1.6)	\$ (0.8)	\$ (0.9)	\$ (2.9)	\$ (1.0)	\$ (1.7)	\$ (1.2)	\$ (1.3)	\$ (1.4)
Total Operating Cash Flow - Unrestricted	\$ (1.5)	\$ (0.5)	\$ 1.7	\$ (0.2)	\$ (0.1)	\$ (0.1)	\$ 1.8	\$ 0.2	\$ 3.9	\$ (0.2)	\$ 0.1	\$ (0.2)	\$ 0.3	\$ (0.3)	\$ 0.3
Non-Operating, BK Related															
RCC Term Loan - Interest	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)
Building & Land Sales	-	-	-	-	-	-	-	-	-	-	-	1.5	-	1.0	-
Non-Recurring	(0.0)	0.0	(0.0)	3.0	(0.3)	(0.0)	(0.4)	4.6	2.5	0.1	0.0	-	-	-	-
Subtotal Non-Operating Activity	\$ (0.1)	\$ (0.1)	\$ (0.2)	\$ 2.9	\$ (0.4)	\$ (0.2)	\$ (0.5)	\$ 4.5	\$ 2.4	\$ (0.0)	\$ (0.1)	\$ 1.4	\$ (0.1)	\$ 0.9	\$ (0.1)
Professional Fees	\$ (1.4)	\$ (1.2)	\$ (1.5)	\$ (1.6)	\$ (2.2)	\$ (1.6)	\$ (2.5)	\$ (2.6)	\$ (1.6)	\$ (1.2)	\$ (0.4)	\$ (1.4)	\$ (4.4)	\$ (0.2)	\$ (0.1)
Other BK Items	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal BK Related Items	\$ (1.4)	\$ (1.2)	\$ (1.5)	\$ (1.6)	\$ (2.2)	\$ (1.6)	\$ (2.5)	\$ (2.6)	\$ (1.6)	\$ (1.2)	\$ (0.4)	\$ (1.4)	\$ (4.4)	\$ (0.2)	\$ (0.1)
Total Net Cash Flow	\$ (3.0)	\$ (1.7)	\$ 0.1	\$ 1.1	\$ (2.8)	\$ (1.8)	\$ (1.1)	\$ 2.2	\$ 4.7	\$ (1.5)	\$ (0.4)	\$ (0.1)	\$ (4.2)	\$ 0.4	\$ 0.0
Beginning Book Cash	\$ 10.9	\$ 7.8	\$ 6.2	\$ 6.2	\$ 7.3	\$ 4.5	\$ 2.7	\$ 1.6	\$ 3.7	\$ 8.4	\$ 6.9	\$ 6.5	\$ 6.3	\$ 2.1	\$ 2.5
Net Cash Flow	(3.0)	(1.7)	0.1	1.1	(2.8)	(1.8)	(1.1)	2.2	4.7	(1.5)	(0.4)	(0.1)	(4.2)	0.4	0.0
Ending Unrestricted Book Cash	\$ 7.8	\$ 6.2	\$ 6.2	\$ 7.3	\$ 4.5	\$ 2.7	\$ 1.6	\$ 3.7	\$ 8.4	\$ 6.9	\$ 6.5	\$ 6.3	\$ 2.1	\$ 2.5	\$ 2.6
Bishop's Annual Appeal Balance	\$ 0.9	\$ 1.0	\$ 0.8	\$ 1.2	\$ 1.6	\$ 1.8	\$ 0.4	\$ 0.5	\$ 0.6	\$ 0.3	\$ 0.2	\$ 0.4	\$ 0.4	\$ 0.4	\$ 0.6
Accrued Professional Fees*	(4.2)	(5.0)	(4.7)	(5.1)	(6.3)	(8.5)	(8.3)	(7.4)	(7.0)	(7.1)	(7.6)	(8.1)	(5.6)	(8.9)	(12.4)
Practical Liquidity	\$ 4.6	\$ 2.2	\$ 2.3	\$ 3.3	\$ (0.2)	\$ (4.0)	\$ (6.4)	\$ (3.1)	\$ 2.1	\$ 0.1	\$ (0.9)	\$ (1.4)	\$ (3.1)	\$ (5.9)	\$ (9.2)

*Assumes payment of all accrued Professional fees as of June 30, 2026 and subject to approval of final fee applications.

Project Sole
Professional Fees

(USD in 000s, unless otherwise noted)

		Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Forecast	Forecast	Forecast	Forecast	
		2025															
Hold		Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	
Debtor Advisors																	
	<i>Foley & Lardner</i>	Y	\$ 682	\$ 645	\$ 440	\$ 678	\$ 1,195	\$ 649	\$ 539	\$ 399	\$ 451	\$ 653	\$ 387	\$ 560	\$ 650	\$ 1,550	\$ 1,800
	<i>Breall & Breall</i>	Y	5	15	4	2	4	2	3	4	7	21	4	3	3	3	3
	<i>Alvarez & Marsal</i>	Y	-	46	-	26	-	137	-	29	-	2	-	60	60	60	60
	<i>VeraCruz</i>	N	70	74	72	72	70	73	70	72	71	70	70	70	70	70	70
	<i>KCC</i>	N	46	35	45	90	68	35	31	38	51	31	31	31	31	31	31
	<i>Sitrick</i>	N	22	4	15	9	10	6	-	8	3	5	5	5	5	5	5
	<i>Sontchi, LLC</i>	Y	7	57	4	-	-	-	-	26	51	10	38	25	10	-	-
	<i>Matthew Kemner</i>	N	59	60	60	64	66	48	75	69	71	73	70	70	70	70	70
	<i>Tim Gallagher</i>	N	-	-	-	91	-	-	-	84	22	22	22	10	25	10	-
	<i>Judge Newsome</i>	N	-	-	-	25	-	-	-	3	22	22	22	10	25	10	-
	<i>Hilco</i>	N	-	98	-	-	-	176	-	-	-	-	-	-	-	-	-
	<i>Canon Lawyer</i>	N	-	-	-	-	-	5	-	-	-	-	-	-	-	-	-
	<i>Claims Valuation Expert</i>	N	-	-	-	-	-	411	252	20	-	10	-	-	-	-	-
	<i>Bad Faith Counsel</i>	N	-	-	-	-	-	-	-	-	36	123	-	-	-	-	-
	Total Debtor Advisors		\$ 892	\$ 1,035	\$ 639	\$ 1,057	\$ 1,413	\$ 1,543	\$ 971	\$ 725	\$ 724	\$ 997	\$ 744	\$ 857	\$ 964	\$ 1,819	\$ 2,039
Creditor Advisors																	
	<i>Lowenstein Sandler</i>	Y	\$ 622	\$ 712	\$ 443	\$ 802	\$ 1,596	\$ 1,479	\$ 841	\$ 320	\$ 284	\$ 237	\$ 129	\$ 550	\$ 550	\$ 1,200	\$ 1,200
	<i>Keller Benvenuti Kim</i>	Y	56	22	9	15	20	22	18	12	19	15	3	20	20	20	20
	<i>Berkeley Research Group</i>	Y	77	100	68	164	244	542	280	101	40	17	10	280	280	280	280
	<i>Burns Bair</i>	Y	183	81	46	37	17	15	51	50	102	117	49	51	51	51	51
	<i>UCC Member Expenses</i>	Y	-	6	0	-	-	-	3	-	-	-	-	2	2	2	2
	<i>Stout Risius Ross</i>	Y	16	16	6	16	6	234	65	371	3	-	-	65	65	65	65
	<i>Douglas Wilson Companies</i>	N	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Total Creditor Advisors		\$ 954	\$ 938	\$ 572	\$ 1,035	\$ 1,883	\$ 2,291	\$ 1,258	\$ 853	\$ 448	\$ 386	\$ 191	\$ 968	\$ 968	\$ 1,618	\$ 1,618
	<i>UST Fees</i>	N	\$ 45	\$ 45	\$ 45	\$ 46	\$ 46	\$ 46	\$ 56	\$ 56	\$ 56	\$ 48	\$ 48	\$ 48	\$ 44	\$ 44	\$ 44
	<i>Fee Examiner</i>	N	\$ -	\$ -	\$ -	\$ -	\$ 100	-	-	100	-	-	-	100	-	-	-
	Total Professional Fees		\$ 1,891	\$ 2,019	\$ 1,257	\$ 2,138	\$ 3,441	\$ 3,880	\$ 2,284	\$ 1,733	\$ 1,228	\$ 1,430	\$ 982	\$ 1,973	\$ 1,977	\$ 3,482	\$ 3,702

Project Sole
Professional Fees

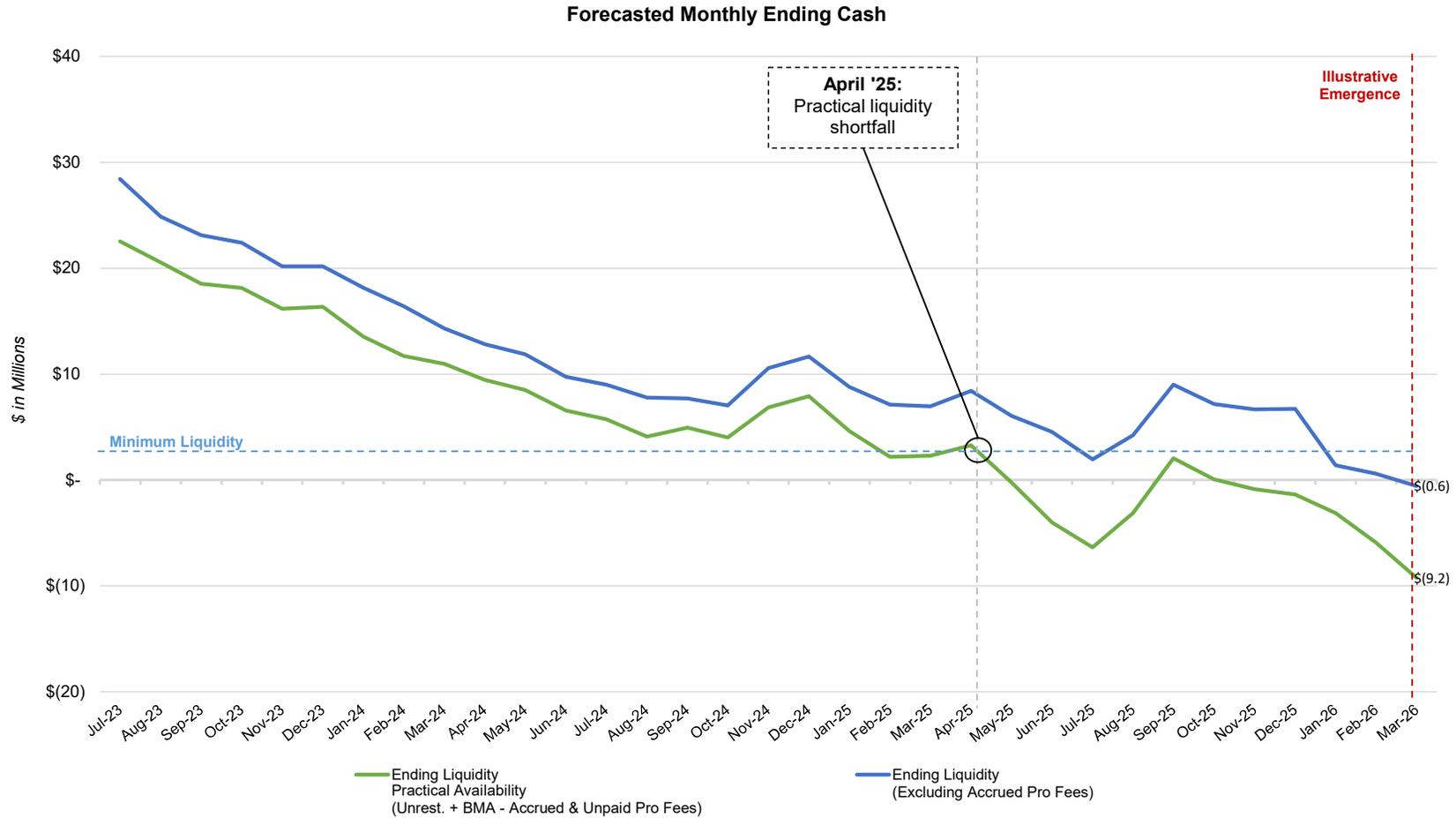
(USD in 000s, unless otherwise noted)

	Actuals	Actuals	Forecast	Forecast	Forecast	Forecast									
2025															
	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Debtor Advisors															
Foley & Lardner	\$ 409	\$ 499	\$ 547	\$ 518	\$ 727	\$ 563	\$ 840	\$ 460	\$ 383	\$ 302	\$ 322	\$ 526	\$ 1,258	\$ -	\$ -
Breall & Breall	10	3	4	12	5	2	3	1	2	3	5	17	10	-	-
Alvarez & Marsal	17	14	-	37	24	20	-	96	-	20	-	2	48	-	-
VeraCruz	71	70	74	-	143	70	73	70	72	71	70	70	70	70	70
KCC	36	44	34	45	90	45	31	50	38	53	31	31	39	31	31
Sitrick	26	-	22	4	-	-	40	-	-	8	3	5	5	5	5
Sontchi, LLC	34	-	6	47	29	3	-	-	-	-	18	49	13	50	8
Matthew Kemner	58	58	59	75	75	75	74	75	69	71	73	70	70	70	70
Tim Gallagher	-	-	-	-	49	-	-	-	-	73	-	-	102	-	-
Judge Newsome	-	-	-	-	15	-	-	-	-	21	-	-	7	-	-
Hilco	-	-	-	80	-	-	-	-	-	-	-	-	146	-	-
Canon Lawyer	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-
Claims Valuation Expert	-	-	-	-	-	-	-	288	177	14	-	8	154	-	-
Bad Faith Counsel	-	-	-	-	-	-	-	-	-	-	-	29	99	-	-
Total Debtor Advisors	\$ 662	\$ 688	\$ 746	\$ 817	\$ 1,157	\$ 778	\$ 1,067	\$ 1,040	\$ 740	\$ 636	\$ 522	\$ 808	\$ 2,020	\$ 227	\$ 184
Creditor Advisors															
Lowenstein Sandler	\$ 455	\$ 349	\$ 502	\$ 571	\$ 633	\$ 654	\$ 1,126	\$ 1,062	\$ 596	\$ 244	\$ -	\$ 393	\$ 1,381	\$ -	\$ -
Keller Benvenuto Kim	45	27	46	18	34	12	14	16	13	9	-	26	32	-	-
Berkeley Research Group	41	50	62	80	92	136	171	379	196	78	-	41	324	-	-
Burns Bair	77	94	148	66	120	34	12	10	36	36	-	167	115	-	-
UCC Member Expenses	1	-	6	0	-	-	-	-	-	3	-	-	-	2	2
Stout Risius Ross	25	11	12	13	22	13	4	164	46	21	-	2	339	-	-
Douglas Wilson Companies	33	-	-	-	54	-	-	-	-	-	-	-	-	-	-
Total Creditor Advisors	\$ 678	\$ 530	\$ 776	\$ 748	\$ 955	\$ 848	\$ 1,327	\$ 1,632	\$ 886	\$ 390	\$ -	\$ 629	\$ 2,190	\$ 2	\$ 2
UST Fees	\$ 137	\$ -	\$ -	\$ 136	\$ -	\$ -	\$ 137	\$ -	\$ -	\$ 167	\$ -	\$ -	\$ 143	\$ -	\$ -
Fee Examiner	-	-	-	-	175	-	-	-	-	100	-	-	100	-	-
Total Professional Fees	\$ 1,476	\$ 1,218	\$ 1,523	\$ 1,701	\$ 2,287	\$ 1,626	\$ 2,531	\$ 2,672	\$ 1,626	\$ 1,293	\$ 522	\$ 1,437	\$ 4,453	\$ 229	\$ 187
Less Kemner (OCP)	(58)	(58)	(59)	(75)	(75)	(75)	(74)	(75)	(69)	(71)	(73)	(70)	(70)	(70)	(70)
Less Canon Lawyer (OCP)	-	-	-	-	-	-	(5)	-	-	-	-	-	-	-	-
Total Professional Fees	\$ 1,418	\$ 1,160	\$ 1,463	\$ 1,626	\$ 2,212	\$ 1,551	\$ 2,452	\$ 2,597	\$ 1,557	\$ 1,222	\$ 450	\$ 1,367	\$ 4,383	\$ 159	\$ 117

EXHIBIT B

Project Sole

Forecasted Monthly Ending Cash - Total, Restricted, Unrestricted, and Practical Liquidity



Project Sole
Consolidated Unrestricted Accounts Cash Forecast

(\$ in Millions)	Actuals	Forecast	Forecast	Forecast	Forecast										
	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Receipts															
Parish Assessment	\$ 0.4	\$ 0.4	\$ 1.4	\$ 0.8	\$ 0.5	\$ 0.3	\$ 1.0	\$ 0.3	\$ 0.4	\$ 0.6	\$ 0.4	\$ 0.8	\$ 0.4	\$ 0.6	\$ 0.7
Bishop's Annual Appeal	-	0.0	0.3	-	-	-	1.9	-	0.0	0.7	0.2	-	-	-	-
Gifts & Grants	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.2	0.0	-	-	-	-
CTN Grant	-	-	0.5	-	-	0.2	-	-	0.5	0.3	-	0.7	-	-	0.5
CMS Contribution	-	-	-	-	-	-	-	0.3	3.2	0.1	0.1	0.1	0.1	0.1	0.1
Ministry Departmental Revenue	0.0	0.2	0.1	0.1	0.1	0.0	0.1	0.0	0.0	0.1	0.1	-	-	-	-
Cemetery Rent	0.0	0.1	0.1	0.7	0.5	0.2	0.3	0.2	0.3	0.2	0.3	0.0	0.2	0.2	0.2
Other Rent	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0	0.0
Workers' Comp (Reimbursement)	-	-	-	-	-	-	0.0	-	-	-	-	-	-	-	-
Package Insurance (Reimbursement)	-	-	0.0	-	-	-	-	-	-	-	-	-	-	-	-
Health Insurance & Related (Reimbursement)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-	-	-	-	-	-
Parochial Fund Management Fee	-	-	-	-	-	-	-	-	-	-	-	-	0.7	0.1	0.1
Other Receipts	0.0	0.0	0.0	0.1	0.0	0.0	0.1	0.1	0.2	0.4	(0.1)	-	(0.0)	(0.1)	(0.0)
Subtotal Receipts	\$ 0.6	\$ 0.7	\$ 2.6	\$ 1.7	\$ 1.1	\$ 0.8	\$ 3.4	\$ 1.0	\$ 4.8	\$ 2.6	\$ 1.1	\$ 1.6	\$ 1.5	\$ 1.0	\$ 1.6
Disbursements															
Payroll (Salaries & Taxes)	\$ (0.4)	\$ (0.5)	\$ (0.4)	\$ (0.4)	\$ (0.5)	\$ (0.4)	\$ (0.5)	\$ (0.4)	\$ (0.4)	\$ (0.5)	\$ (0.4)	\$ (0.5)	\$ (0.5)	\$ (0.5)	\$ (0.5)
Payroll (Vendors)	(0.0)	(0.0)	(0.0)	-	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	-	-	(0.0)
Professional Fees & Contractors	(0.2)	(0.2)	(0.2)	(0.1)	(0.2)	(0.2)	(0.2)	(0.1)	(0.2)	(0.2)	(0.2)	(0.4)	(0.2)	(0.2)	(0.2)
Bishop's Appeal Rebate	-	(0.2)	(0.1)	-	-	-	-	-	-	-	-	-	-	-	-
Facilities - Cathedral	(0.8)	(0.0)	-	(0.9)	-	-	(0.7)	-	-	(1.1)	-	-	(0.3)	(0.3)	(0.3)
Facilities - Other	(0.0)	(0.0)	(0.0)	(0.1)	(0.0)	(0.0)	(0.0)	(0.0)	(0.1)	(0.1)	(0.1)	(0.1)	(0.0)	(0.0)	(0.0)
Workers' Comp (Direct Pmt)	(0.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Package Insurance (Direct Pmt)	(0.0)	-	(0.0)	-	(0.0)	-	(0.0)	-	0.0	-	0.2	-	-	-	-
Health Insurance & Related (Direct Pmt)	-	-	-	-	-	(0.0)	-	-	(0.0)	(0.0)	(0.0)	-	-	-	-
Clergy Retirement	(0.0)	(0.1)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.7)	(0.3)	(0.5)	(0.0)	(0.0)	(0.3)
Other Clergy Costs	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.2)	(0.0)	(0.0)	(0.0)
Postage & Printing	(0.0)	(0.0)	(0.0)	(0.1)	(0.1)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.0)	(0.1)	(0.0)	(0.0)	(0.0)
Program, Ministry & Other	(0.4)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	-	-	-
Other Mission Related	(0.0)	(0.1)	(0.0)	(0.1)	(0.2)	(0.0)	(0.0)	(0.1)	(0.1)	(0.1)	(0.1)	(0.0)	(0.1)	(0.3)	(0.0)
Second Collections (Pass-through) - Pmt	(0.0)	(0.0)	-	-	(0.0)	-	-	-	-	-	0.1	-	-	-	-
Subtotal Operating Disbursements	\$ (2.0)	\$ (1.2)	\$ (0.9)	\$ (1.9)	\$ (1.2)	\$ (0.9)	\$ (1.6)	\$ (0.8)	\$ (0.9)	\$ (2.9)	\$ (1.0)	\$ (1.7)	\$ (1.2)	\$ (1.3)	\$ (1.4)
Total Operating Cash Flow - Unrestricted	\$ (1.5)	\$ (0.5)	\$ 1.7	\$ (0.2)	\$ (0.1)	\$ (0.1)	\$ 1.8	\$ 0.2	\$ 3.9	\$ (0.2)	\$ 0.1	\$ (0.2)	\$ 0.3	\$ (0.3)	\$ 0.3
Non-Operating, BK Related															
RCC Term Loan - Interest	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)	\$ (0.1)
Building & Land Sales	-	-	-	-	-	-	-	-	-	-	-	1.5	-	1.0	-
Non-Recurring	(0.0)	0.0	(0.0)	3.0	(0.3)	(0.0)	(0.4)	4.6	2.5	0.1	0.0	-	-	-	-
Subtotal Non-Operating Activity	\$ (0.1)	\$ (0.1)	\$ (0.2)	\$ 2.9	\$ (0.4)	\$ (0.2)	\$ (0.5)	\$ 4.5	\$ 2.4	\$ (0.0)	\$ (0.1)	\$ 1.4	\$ (0.1)	\$ 0.9	\$ (0.1)
Professional Fees	\$ (1.4)	\$ (1.2)	\$ (1.5)	\$ (1.6)	\$ (2.2)	\$ (1.6)	\$ (2.5)	\$ (2.6)	\$ (1.6)	\$ (1.2)	\$ (0.4)	\$ (1.4)	\$ (5.5)	\$ (1.4)	\$ (1.5)
Other BK Items	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal BK Related Items	\$ (1.4)	\$ (1.2)	\$ (1.5)	\$ (1.6)	\$ (2.2)	\$ (1.6)	\$ (2.5)	\$ (2.6)	\$ (1.6)	\$ (1.2)	\$ (0.4)	\$ (1.4)	\$ (5.5)	\$ (1.4)	\$ (1.5)
Total Net Cash Flow	\$ (3.0)	\$ (1.7)	\$ 0.1	\$ 1.1	\$ (2.8)	\$ (1.8)	\$ (1.1)	\$ 2.2	\$ 4.7	\$ (1.5)	\$ (0.4)	\$ (0.1)	\$ (5.3)	\$ (0.9)	\$ (1.3)
Beginning Book Cash	\$ 10.9	\$ 7.8	\$ 6.2	\$ 6.2	\$ 7.3	\$ 4.5	\$ 2.7	\$ 1.6	\$ 3.7	\$ 8.4	\$ 6.9	\$ 6.5	\$ 6.3	\$ 1.0	\$ 0.2
Net Cash Flow	(3.0)	(1.7)	0.1	1.1	(2.8)	(1.8)	(1.1)	2.2	4.7	(1.5)	(0.4)	(0.1)	(5.3)	(0.9)	(1.3)
Ending Unrestricted Book Cash	\$ 7.8	\$ 6.2	\$ 6.2	\$ 7.3	\$ 4.5	\$ 2.7	\$ 1.6	\$ 3.7	\$ 8.4	\$ 6.9	\$ 6.5	\$ 6.3	\$ 1.0	\$ 0.2	\$ (1.1)
Bishop's Annual Appeal Balance	\$ 0.9	\$ 1.0	\$ 0.8	\$ 1.2	\$ 1.6	\$ 1.8	\$ 0.4	\$ 0.5	\$ 0.6	\$ 0.3	\$ 0.2	\$ 0.4	\$ 0.4	\$ 0.4	\$ 0.6
Accrued Professional Fees*	(4.2)	(5.0)	(4.7)	(5.1)	(6.3)	(8.5)	(8.3)	(7.4)	(7.0)	(7.1)	(7.6)	(8.1)	(4.5)	(6.5)	(8.7)
Practical Liquidity	\$ 4.6	\$ 2.2	\$ 2.3	\$ 3.3	\$ (0.2)	\$ (4.0)	\$ (6.4)	\$ (3.1)	\$ 2.1	\$ 0.1	\$ (0.9)	\$ (1.4)	\$ (3.1)	\$ (5.9)	\$ (9.2)

*Assumes payment of all accrued Professional fees as of June 30, 2026 and subject to approval of final fee applications.

Project Sole
Professional Fees

(USD in 000s, unless otherwise noted)

		Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Forecast	Forecast	Forecast	Forecast	
		2025															
Hold		Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	
Debtor Advisors																	
	<i>Foley & Lardner</i>	Y	\$ 682	\$ 645	\$ 440	\$ 678	\$ 1,195	\$ 649	\$ 539	\$ 399	\$ 451	\$ 653	\$ 387	\$ 560	\$ 650	\$ 1,550	\$ 1,800
	<i>Breall & Breall</i>	Y	5	15	4	2	4	2	3	4	7	21	4	3	3	3	3
	<i>Alvarez & Marsal</i>	Y	-	46	-	26	-	137	-	29	-	2	-	60	60	60	60
	<i>VeraCruz</i>	N	70	74	72	72	70	73	70	72	71	70	70	70	70	70	70
	<i>KCC</i>	N	46	35	45	90	68	35	31	38	51	31	31	31	31	31	31
	<i>Sitrick</i>	N	22	4	15	9	10	6	-	8	3	5	5	5	5	5	5
	<i>Sontchi, LLC</i>	Y	7	57	4	-	-	-	-	26	51	10	38	25	10	-	-
	<i>Matthew Kemner</i>	N	59	60	60	64	66	48	75	69	71	73	70	70	70	70	70
	<i>Tim Gallagher</i>	N	-	-	-	91	-	-	-	84	22	22	22	10	25	10	-
	<i>Judge Newsome</i>	N	-	-	-	25	-	-	-	3	22	22	22	10	25	10	-
	<i>Hilco</i>	N	-	98	-	-	-	176	-	-	-	-	-	-	-	-	-
	<i>Canon Lawyer</i>	N	-	-	-	-	-	5	-	-	-	-	-	-	-	-	-
	<i>Claims Valuation Expert</i>	N	-	-	-	-	-	411	252	20	-	10	-	-	-	-	-
	<i>Bad Faith Counsel</i>	N	-	-	-	-	-	-	-	-	36	123	-	-	-	-	-
	Total Debtor Advisors		\$ 892	\$ 1,035	\$ 639	\$ 1,057	\$ 1,413	\$ 1,543	\$ 971	\$ 725	\$ 724	\$ 997	\$ 744	\$ 857	\$ 964	\$ 1,819	\$ 2,039
Creditor Advisors																	
	<i>Lowenstein Sandler</i>	Y	\$ 622	\$ 712	\$ 443	\$ 802	\$ 1,596	\$ 1,479	\$ 841	\$ 320	\$ 284	\$ 237	\$ 129	\$ 550	\$ 550	\$ 1,200	\$ 1,200
	<i>Keller Benvenuti Kim</i>	Y	56	22	9	15	20	22	18	12	19	15	3	20	20	20	20
	<i>Berkeley Research Group</i>	Y	77	100	68	164	244	542	280	101	40	17	10	280	280	280	280
	<i>Burns Bair</i>	Y	183	81	46	37	17	15	51	50	102	117	49	51	51	51	51
	<i>UCC Member Expenses</i>	Y	-	6	0	-	-	-	3	-	-	-	-	2	2	2	2
	<i>Stout Risius Ross</i>	Y	16	16	6	16	6	234	65	371	3	-	-	65	65	65	65
	<i>Douglas Wilson Companies</i>	N	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Total Creditor Advisors		\$ 954	\$ 938	\$ 572	\$ 1,035	\$ 1,883	\$ 2,291	\$ 1,258	\$ 853	\$ 448	\$ 386	\$ 191	\$ 968	\$ 968	\$ 1,618	\$ 1,618
	<i>UST Fees</i>	N	\$ 45	\$ 45	\$ 45	\$ 46	\$ 46	\$ 46	\$ 56	\$ 56	\$ 56	\$ 48	\$ 48	\$ 48	\$ 54	\$ 54	\$ 54
	<i>Fee Examiner</i>	N	\$ -	\$ -	\$ -	\$ -	\$ 100	-	-	100	-	-	-	100	-	-	-
	Total Professional Fees		\$ 1,891	\$ 2,019	\$ 1,257	\$ 2,138	\$ 3,441	\$ 3,880	\$ 2,284	\$ 1,733	\$ 1,228	\$ 1,430	\$ 982	\$ 1,973	\$ 1,987	\$ 3,492	\$ 3,712

Project Sole
Professional Fees

(USD in 000s, unless otherwise noted)

	Actuals	Actuals	Forecast	Forecast	Forecast	Forecast									
2025															
	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Debtor Advisors															
Foley & Lardner	\$ 409	\$ 499	\$ 547	\$ 518	\$ 727	\$ 563	\$ 840	\$ 460	\$ 383	\$ 302	\$ 322	\$ 526	\$ 1,574	\$ 448	\$ 520
Breall & Breall	10	3	4	12	5	2	3	1	2	3	5	17	12	2	2
Alvarez & Marsal	17	14	-	37	24	20	-	96	-	20	-	2	64	48	48
VeraCruz	71	70	74	-	143	70	73	70	72	71	70	70	70	70	70
KCC	36	44	34	45	90	45	31	50	38	53	31	31	41	31	31
Sitrick	26	-	22	4	-	-	40	-	-	8	3	5	5	5	5
Sontchi, LLC	34	-	6	47	29	3	-	-	-	-	18	49	13	50	8
Matthew Kemner	58	58	59	75	75	75	74	75	69	71	73	70	70	70	70
Tim Gallagher	-	-	-	-	49	-	-	-	-	73	-	-	102	-	-
Judge Newsome	-	-	-	-	15	-	-	-	-	21	-	-	7	-	-
Hilco	-	-	-	80	-	-	-	-	-	-	-	-	194	-	-
Canon Lawyer	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-
Claims Valuation Expert	-	-	-	-	-	-	-	288	177	14	-	8	205	-	-
Bad Faith Counsel	-	-	-	-	-	-	-	-	-	-	-	29	99	-	-
Total Debtor Advisors	\$ 662	\$ 688	\$ 746	\$ 817	\$ 1,157	\$ 778	\$ 1,067	\$ 1,040	\$ 740	\$ 636	\$ 522	\$ 808	\$ 2,456	\$ 725	\$ 755
Creditor Advisors															
Lowenstein Sandler	\$ 455	\$ 349	\$ 502	\$ 571	\$ 633	\$ 654	\$ 1,126	\$ 1,062	\$ 596	\$ 244	\$ -	\$ 393	\$ 1,806	\$ 440	\$ 440
Keller Benvenuto Kim	45	27	46	18	34	12	14	16	13	9	-	26	41	16	16
Berkeley Research Group	41	50	62	80	92	136	171	379	196	78	-	41	429	224	224
Burns Bair	77	94	148	66	120	34	12	10	36	36	-	167	141	41	41
UCC Member Expenses	1	-	6	0	-	-	-	-	-	3	-	-	-	2	2
Stout Risius Ross	25	11	12	13	22	13	4	164	46	21	-	2	452	52	52
Douglas Wilson Companies	33	-	-	-	54	-	-	-	-	-	-	-	-	-	-
Total Creditor Advisors	\$ 678	\$ 530	\$ 776	\$ 748	\$ 955	\$ 848	\$ 1,327	\$ 1,632	\$ 886	\$ 390	\$ -	\$ 629	\$ 2,869	\$ 775	\$ 775
UST Fees	\$ 137	\$ -	\$ -	\$ 136	\$ -	\$ -	\$ 137	\$ -	\$ -	\$ 167	\$ -	\$ -	\$ 143	\$ -	\$ -
Fee Examiner	-	-	-	-	175	-	-	-	-	100	-	-	100	-	-
Total Professional Fees	\$ 1,476	\$ 1,218	\$ 1,523	\$ 1,701	\$ 2,287	\$ 1,626	\$ 2,531	\$ 2,672	\$ 1,626	\$ 1,293	\$ 522	\$ 1,437	\$ 5,568	\$ 1,500	\$ 1,530
Less Kemner (OCP)	(58)	(58)	(59)	(75)	(75)	(75)	(74)	(75)	(69)	(71)	(73)	(70)	(70)	(70)	(70)
Less Canon Lawyer (OCP)	-	-	-	-	-	-	(5)	-	-	-	-	-	-	-	-
Total Professional Fees	\$ 1,418	\$ 1,160	\$ 1,463	\$ 1,626	\$ 2,212	\$ 1,551	\$ 2,452	\$ 2,597	\$ 1,557	\$ 1,222	\$ 450	\$ 1,367	\$ 5,498	\$ 1,430	\$ 1,460