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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**

<p>21 <i>In re:</i> 22 THE ROMAN CATHOLIC BISHOP OF 23 OAKLAND, a California corporation sole, 24 Debtor.</p>	<p>Case No. 23-40523 WJL Chapter 11 MONTHLY PROFESSIONAL FEE STATEMENT FOR BURNS BAIR LLP [DECEMBER 2025]</p>
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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 December 1, 2025 through December 31, 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 December 1, 2025 through December 31, 2025	\$56,354.00	\$0	\$56,354.00
9 Net Total Allowed Payments this Statement 10 Period: (80% of Fees and 100% of Costs)	\$45,083.20	\$0	\$45,083.20

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: January 30, 2026

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
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The Roman Catholic Bishop of Oakland UCC

Issue Date : 1/29/2026

Bill # : 02132

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/2/2025	Timothy Burns	Participate in state court counsel meeting re mediation developments and term sheet issues (1.2);	1.20	\$1,344.00
12/2/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re ongoing negotiations and Committee counter-term sheet (1.2);	1.20	\$1,080.00
12/4/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, mediation, and ongoing negotiations (1.1);	1.10	\$990.00
12/9/2025	Timothy Burns	Participate in state court counsel meeting re mediation negotiations, strategy, and next-steps in connection with same (1.0);	1.00	\$1,120.00
12/9/2025	Timothy Burns	Participate in Committee meeting for insurance purposes re mediation developments and strategy (1.1);	1.10	\$1,232.00
12/9/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments, ongoing negotiations, and strategy (1.0) ;	1.00	\$900.00
12/11/2025	Jesse Bair	Participate in state court counsel meeting re ongoing negotiations, strategy, and response to mediators' draft term sheet (1.0);	1.00	\$900.00
12/11/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, negotiations, and strategy re next-steps (.9);	0.90	\$810.00
12/11/2025	Timothy Burns	Prepare for state court counsel meeting (.2); participate in state court counsel meeting re mediators' term sheet, ongoing negotiations, and strategy (1.0);	1.20	\$1,344.00

12/17/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re term sheet counter, ongoing negotiations, and strategy (1.3);	1.30	\$1,170.00
Totals for Committee Meetings			11.00	\$10,890.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/1/2025	Jesse Bair	Review and edit monthly fee statement and correspond with Committee professionals re same (.3);	0.30	\$270.00
12/1/2025	Jesse Bair	Review fee examiner's final report re interim fee applications (.1);	0.10	\$90.00
12/3/2025	Jesse Bair	Prepare for fee application hearing (.4);	0.40	\$360.00
12/29/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and correspond with J. Bair re same (.3);	0.30	\$102.00
12/29/2025	Jesse Bair	Review and edit monthly fee statement and correspond with KBK re same (.2);	0.20	\$180.00
Totals for Fee Applications			1.30	\$1,002.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/3/2025	Jesse Bair	Participate in hearing re case status and interim fee applications (.6);	0.60	\$540.00
12/18/2025	Jesse Bair	Participate in case status conference for insurance purposes (1.2);	1.20	\$1,080.00
Totals for Hearings			1.80	\$1,620.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/1/2025	Timothy Burns	Conference with B. Weisenberg re mediation developments (.2); correspondence with state court counsel re mediation term sheet (.2);	0.40	\$448.00
12/1/2025	Jesse Bair	Participate in call with B. Wiesenberg re negotiation updates and term sheet revisions (.4);	0.40	\$360.00
12/1/2025	Jesse Bair	Review and edit the Committee's counter term sheet (1.7);	1.70	\$1,530.00
12/1/2025	Jesse Bair	Review correspondence with state court counsel and Committee professionals re term sheet issues and ongoing negotiations (.2);	0.20	\$180.00
12/1/2025	Jesse Bair	Review C. Sonthci proposed revisions to earlier term sheet and Lowenstein preliminary responses to same (.2);	0.20	\$180.00

12/1/2025	Jesse Bair	Draft revised version of Committee counter-term sheet based on comments from state court counsel (.5); correspond with state court counsel and Committee professionals re same (.2);	0.70	\$630.00
12/2/2025	Timothy Burns	Review revised term sheet, including additional revisions from state court counsel (.4); review and respond to correspondence with state court counsel and Committee professionals re same (.3);	0.70	\$784.00
12/2/2025	Timothy Burns	Review correspondence with the mediators re mediation issues and developments (.2);	0.20	\$224.00
12/2/2025	Timothy Burns	Review additional correspondence with Committee professionals and state court counsel re mediation term sheet issues (.2);	0.20	\$224.00
12/2/2025	Timothy Burns	Review materials re recent Debtor insurance activities and correspond with B. Weisenberg re same (.3);	0.30	\$336.00
12/2/2025	Timothy Burns	Participate in additional call with state court counsel re mediation term sheet issues (.2); participate in conference with J. Bair re same and ongoing insurance negotiations (.2);	0.40	\$448.00
12/2/2025	Jesse Bair	Participate in call with B. Wiesenberg re term sheet insurance issues (.2);	0.20	\$180.00
12/2/2025	Jesse Bair	Analyze insurance TDP issues and correspond with B. Wiesenberg re revisions needed with respect to same and other insurance issues (.4);	0.40	\$360.00
12/2/2025	Jesse Bair	Review further revised version of Committee counter-term sheet and related correspondence with state court counsel (.2);	0.20	\$180.00
12/2/2025	Jesse Bair	Participate in conference with T. Burns re insurance negotiations (.2);	0.20	\$180.00
12/3/2025	Jesse Bair	Participate in call with state court counsel re ongoing negotiations and term sheet insurance issues (.4);	0.40	\$360.00
12/3/2025	Jesse Bair	Formulate additional insurance inserts needed for term sheet and participate in call with B. Wiesenberg re same (.3);	0.30	\$270.00
12/3/2025	Timothy Burns	Review and edit further revised version of draft Committee term sheet (.5);	0.50	\$560.00
12/3/2025	Timothy Burns	Participate in conference with state court counsel re various mediation issues (.6);	0.60	\$672.00
12/4/2025	Jesse Bair	Review the debtor and certain insurers' joint discovery letter to district court and Pacific's response to same (.2);	0.20	\$180.00
12/4/2025	Jesse Bair	Review trust distribution protocols from Third Amended RCBO Plan in connection with ongoing negotiations (.6);	0.60	\$540.00

12/4/2025	Jesse Bair	Review and edit most recent iteration of the Committee's counter term sheet (.4);	0.40	\$360.00
12/6/2025	Timothy Burns	Correspondence with mediators re Zoom insurance mediation session (.2); conference with J. Prol re same (.2);	0.40	\$448.00
12/6/2025	Timothy Burns	Participate in insurance Zoom mediation session (.5);	0.50	\$560.00
12/6/2025	Jesse Bair	Prepare for Zoom session with mediator re case insurance negotiations (.1); participate in Zoom session with mediator re same (.5);	0.60	\$540.00
12/7/2025	Timothy Burns	Review and respond to correspondence with the debtor re mediation and insurance issues (.8);	0.80	\$896.00
12/8/2025	Timothy Burns	Conference with Debtor re mediation negotiations (.2);	0.20	\$224.00
12/8/2025	Timothy Burns	Participate in call with state court counsel re mediation issues (.2); participate in conference with J. Bair re mediation developments and next-steps (.1);	0.30	\$336.00
12/8/2025	Jesse Bair	Participate in conference with T. Burns re mediation negotiations and next-steps (.1);	0.10	\$90.00
12/9/2025	Timothy Burns	Participate in call with state court counsel re insurance mediation issues (.2);	0.20	\$224.00
12/9/2025	Timothy Burns	Conference with B. Weisenberg re ongoing mediation negotiations (.2); review related correspondence in connection with same (.1);	0.30	\$336.00
12/9/2025	Jesse Bair	Review revised Committee term sheet sent to the mediators and related correspondence re same and ongoing negotiations (.2);	0.20	\$180.00
12/10/2025	Timothy Burns	Brief review re mediators' proposed term sheet (.2); conference with B. Wiesenberg re same (.2);	0.40	\$448.00
12/10/2025	Nathan Kuenzi	Analyze term sheet provided by mediators and compare insurance-related provisions to language previously proposed by the Committee (2.1);	2.10	\$1,155.00
12/10/2025	Jesse Bair	Review and analyze revised term sheet circulated by the mediators (.8); review correspondence with state court counsel, Committee professionals, and the Committee re same (.1);	0.90	\$810.00
12/11/2025	Jesse Bair	Brief review re Debtor's notice of filing of term sheet, accompanying term sheet, and correspond with Committee professionals re same (.3);	0.30	\$270.00
12/11/2025	Timothy Burns	Finish reviewing mediators' proposed term sheet (.8);	0.80	\$896.00

12/11/2025	Nathan Kuenzi	Begin analyzing filed version of RCBO Term Sheet, comparing against mediators' proposed term sheet, and addressing significant discrepancies (1.7);	1.70	\$935.00
12/12/2025	Timothy Burns	Brief review of notice of filing of term sheet and term sheet (.3); correspondence with N. Kuenzi re same (2);	0.50	\$560.00
12/12/2025	Timothy Burns	Review various correspondence with the mediators, state court counsel, and Committee professionals re mediators' proposal (.3);	0.30	\$336.00
12/12/2025	Nathan Kuenzi	Finish analyzing differences between mediators' proposed term sheet, RCBO's filed Term Sheet, and the Committee's proposed term sheet (2.1); draft email memo summarizing same (.6);	2.70	\$1,485.00
12/12/2025	Timothy Burns	Participate in call with state court counsel re term sheet issues and ongoing negotiations (.3);	0.30	\$336.00
12/12/2025	Jesse Bair	Continue reviewing debtor's corrected term sheet (.2); review and respond to various correspondence with state court counsel and Committee professionals re same, potential response, and ongoing negotiations (.3);	0.50	\$450.00
12/13/2025	Jesse Bair	Review correspondence with the mediator and state court counsel re mediation call (.1);	0.10	\$90.00
12/13/2025	Timothy Burns	Review various correspondence with Committee professionals and state court counsel re mediation term sheet issues (.4);	0.40	\$448.00
12/13/2025	Timothy Burns	Correspondence with the mediators and state court counsel re mediation insurance issues (.3); conferences with T. Gallagher and state court counsel re same (.2);	0.50	\$560.00
12/14/2025	Timothy Burns	Brief review of correspondence with Committee professionals and state court counsel re potential counter-proposal to the mediator's term sheet (.2);	0.20	\$224.00
12/14/2025	Timothy Burns	Prepare for mediation session with T. Gallagher (.3); review N. Kuenzi memo re differences in term sheets (.2);	0.50	\$560.00
12/14/2025	Timothy Burns	Participate in mediation call with T. Gallagher re various insurance mediation issues (.5);	0.50	\$560.00
12/14/2025	Timothy Burns	Review J. Bair's correspondence with Lowenstein and separate correspondence with state court counsel re insurance terms relating to mediation proposal (.2);	0.20	\$224.00
12/14/2025	Jesse Bair	Participate in call with the mediator re case insurance issues and negotiations (.5);	0.50	\$450.00

12/14/2025	Jesse Bair	Review the Committee's proposed response to the mediators' term sheet and draft insurance-related section of same (2.8); review and respond to correspondence with Committee professionals and state court counsel re same (.3); participate in call with B. Wiesenberg re same (.2); participate in call with state court counsel re same (.2);	3.50	\$3,150.00
12/15/2025	Jesse Bair	Review various correspondence with state court counsel and Committee professionals re Committee counter-term sheet edits and strategy (.2);	0.20	\$180.00
12/15/2025	Jesse Bair	Answer state court counsel question re lift stay insurance issues (.1);	0.10	\$90.00
12/15/2025	Timothy Burns	Review draft Committee counter-proposal (.7);	0.70	\$784.00
12/15/2025	Timothy Burns	Review multiple correspondence with Committee professionals and state court counsel re Plan insurance terms and related mediation issues (.5);	0.50	\$560.00
12/18/2025	Jesse Bair	Review the debtor's most recent supplemental term sheet, analyzing insurer exposures in connection with proposed insurance settlement, and correspond with Committee professionals re same (.3);	0.30	\$270.00
12/18/2025	Jesse Bair	Review the Committee's status report and Pacific's request for judicial notice in connection with upcoming status conference (.2);	0.20	\$180.00
12/18/2025	Nathan Kuenzi	Analyze differences between the Debtor's supplemental term sheet, the Debtor's prior term sheet, and draft summary re same (.8);	0.80	\$440.00
12/18/2025	Nathan Kuenzi	Analyze Pacific Insurers' filing of Request for Judicial Notice (.2);	0.20	\$110.00
12/19/2025	Timothy Burns	Correspondence and calls re insurance meeting with the debtor (.2);	0.20	\$224.00
12/21/2025	Jesse Bair	Review correspondence with Committee professionals re upcoming insurance call with the debtor and additional case developments (.1);	0.10	\$90.00
12/22/2025	Timothy Burns	Conference with B. Weisenberg re mediation developments and strategy (.3);	0.30	\$336.00
12/22/2025	Nathan Kuenzi	Participate in call with Debtor's insurance counsel (.7);	0.70	\$385.00
12/22/2025	Nathan Kuenzi	Participate in conference with T. Burns and J. Prol regarding case insurance issues and call with debtor re same (.5);	0.50	\$275.00
12/22/2025	Timothy Burns	Participate in call with Debtor's insurance counsel re various case insurance issues (.7);	0.70	\$784.00

12/22/2025	Timothy Burns	Participate in call with J. Prol and N. Kuenzi re meeting with debtor re various case insurance issues (.5);	0.50	\$560.00
12/22/2025	Timothy Burns	Provide instructions to N. Kuenzi re assignments re outcome of conference with Debtor's counsel re various case insurance issues (.3);	0.30	\$336.00
12/22/2025	Timothy Burns	Review and revise N. Kuenzi's initial memo re mediation-related insurance cases (.4);	0.40	\$448.00
12/22/2025	Nathan Kuenzi	Research and analyze California case law re various insurance issues raised in call with Debtor's insurance counsel re the Debtor's most recent insurance proposal (4.3);	4.30	\$2,365.00
12/22/2025	Nathan Kuenzi	Draft memo analyzing the Debtor's most recent insurance proposal, including incorporating initial suggested revisions from T. Burns (2.8);	2.80	\$1,540.00
12/23/2025	Timothy Burns	Review and analysis of case law re Diocese's most recent insurance proposal and review and revise N. Kuenzi's memo re same (2.2);	2.20	\$2,464.00
12/27/2025	Jesse Bair	Review materials re debtor insurance strategy and correspond with Committee professionals re same (.3);	0.30	\$270.00
12/29/2025	Timothy Burns	Participate in conference with J. Bair re mediation developments and outcome of insurance call with the debtor (.2);	0.20	\$224.00
12/29/2025	Timothy Burns	Review J. Bair's suggested edits to insurance memo and revise memo to incorporate same (1.4);	1.40	\$1,568.00
12/29/2025	Timothy Burns	Review Lowenstein's suggested edits to insurance memo assessing debtor's most recent insurance proposal (.3);	0.30	\$336.00
12/29/2025	Jesse Bair	Review and edit memo assessing the debtor's most recent insurance proposal (.3); participate in conference with T. Burns re same (.2);	0.50	\$450.00
12/30/2025	Jesse Bair	Participate in conference with T. Burns re mediation developments (.1);	0.10	\$90.00
12/30/2025	Timothy Burns	Conference with B. Weisenberg re mediation developments and debtor's most recent insurance proposal (.2); participate in conference with J. Bair re same (.1);	0.30	\$336.00
12/31/2025	Jesse Bair	Review correspondence re January mediation session and brief preparations in connection with same (.2);	0.20	\$180.00
Totals for Insurance Recovery Activities			49.20	\$42,842.00

Total Hours and Fees	63.30	\$56,354.00
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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
Jesse Bair	Partner	24.10	\$900.00	\$21,690.00
Nathan Kuenzi	Associate	15.80	\$550.00	\$8,690.00
Timothy Burns	Partner	23.10	\$1,120.00	\$25,872.00

Total Due This Invoice: \$56,354.00