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13 *Special Insurance Counsel for*
14 *the Debtor*

15 UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 In re:

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

21 Debtor.

22 Case No.: 23-40523 WJL

23 Chapter 11

24 **COVER SHEET TO FIRST INTERIM FEE**
25 **APPLICATION OF COVINGTON &**
26 **BURLING LLP, AS SPECIAL**
27 **INSURANCE COUNSEL FOR THE**
28 **DEBTOR, FOR ALLOWANCE OF**
COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF OCTOBER 7, 2025
THROUGH DECEMBER 31, 2025

Judge: Hon. William J. Lafferty

Date: February 20, 2026

Time: 10:30 a.m.

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

Objection Deadline: March 17, 2026



1	Name of Applicant:	Covington & Burling LLP
2	Name of Client:	The Roman Catholic Bishop of Oakland
3	Time Period covered by this Application:	October 7, 2025 – December 31, 2025
4	Total compensation sought this period:	\$237,030.00
5	Total expenses sought this period:	\$871.31
6	Petition date:	May 8, 2023
7	Retention date:	Effective as of October 7, 2025
8	Date of order approving employment:	November 12, 2025 [Dkt. No. 2450]
9	Total fees approved by interim order to date:	\$0.00
10	Total expenses approved by interim order to date:	\$0.00
11	Total allowed fees paid to date:	\$0.00
12	Total allowed expenses paid to date:	\$0.00
13	Blended rate in this application for all attorneys:	\$1,050.00
14	Blended rate in this application for all timekeepers:	\$1,039.15
15	Fees sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$189,624.00
16	Expenses sought in this application and already paid pursuant to a monthly compensation order but not yet allowed:	\$871.31
17	Number of professionals included in this application:	8
18	If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
19	If applicable, difference between fees budgeted and compensation sought for this period:	N/A
20	Number of professionals billing fewer than 15 hours:	4
21	Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation rate sought in this application using the rates originally disclosed in the retention application:	No
22	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
12/01/2025 (Dkt. No. 2477)	10/07/2025 – 10/31/2025	\$28,812.00	\$36,015.00	\$23.20	\$28,812.00	\$23.20	\$28,835.20
12/26/2026 (Dkt. No. 2536)	11/01/2025 – 11/30/2025	\$98,316.00	\$122,895.00	\$601.96	\$98,316.00	\$601.96	\$98,917.96
1/30/2025 (Dkt. No. 2595)	12/01/2025 – 12/31/2025	\$62,496.00	\$78,120.00	\$246.15	\$62,496.00	\$246.15	\$62,742.15
Total		\$189,624.00	\$237,030.00	\$871.31	\$189,624.00	\$871.31	\$190,495.31

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Application and Not Yet Paid: \$47,406.00

DATED: February 20, 2026

COVINGTON & BURLING, LLP

By: /s/ Abigail V. O'Brient

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1999 Avenue of the Stars, Suite 3500
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Special Insurance Counsel for the Debtor

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15 UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 In re:

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

21 Debtor.

22 Case No.: 23-40523 WJL

23 Chapter 11

24 **FIRST INTERIM FEE APPLICATION OF**
25 **COVINGTON & BURLING LLP, AS**
26 **SPECIAL INSURANCE COUNSEL FOR**
27 **THE DEBTOR, FOR ALLOWANCE OF**
28 **COMPENSATION AND**
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF OCTOBER 7, 2025
THROUGH DECEMBER 31, 2025

Judge: Hon. William J. Lafferty

Date: February 20, 2026

Time: 10:30 a.m.

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

Objection Deadline: March 17, 2026

1 **I. INTRODUCTION**

2 Covington & Burling LLP (“Covington” or the “Firm”), as special insurance counsel to The
3 Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession
4 (the “Debtor” or “RCBO”), respectfully submits this first interim application for allowance of
5 compensation and reimbursement of actual and necessary expenses (the “Interim Application”) for
6 services performed as special insurance counsel to the Debtor for the period of October 7, 2025 through
7 December 31, 2025 (the “Interim Fee Period”).

8 Covington seeks interim approval of its fees incurred and reimbursement of expenses during the
9 Interim Fee Period totaling **\$237,901.31**, which sum represents compensation for legal services rendered
10 in the amount of **\$237,030.00** and reimbursement for expenses incurred in the amount of **\$871.31**.
11 Covington spent a total of 228.10 hours and incurred a total of \$237,030.00 in fees associated with the
12 services provided to the debtor in this matter, of which Covington requests a total of \$47,406.00 be paid
13 to Covington.

14 This Interim Application is based upon the contents hereof, together with the exhibits, the
15 declaration of Abigail V. O’Brien filed concurrently herewith, the pleadings, papers, and records on file
16 in this case, and any evidence that the Court may entertain at the time of the hearing on the Interim
17 Application. This Interim Application is subject to the United States Department of Justice’s *Appendix B*
18 *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under*
19 *United States Code by Attorneys in Larger Chapter 11 Cases* (the “Large Case Guidelines”). Summary
20 charts complying with the Large Case Guidelines and detailing the amounts of fees charged and hours
21 worked by each of Covington’s professionals and paraprofessionals during the Interim Fee Period are
22 attached hereto as **Exhibit B** through **Exhibit F**.

23 **II. GENERAL BACKGROUND**

24 On May 8, 2023 (the “Petition Date”), the Debtor commenced the above-captioned chapter 11
25 bankruptcy case (the “Chapter 11 Case”). The Debtor continues to operate its ministry and manage its
26 properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee
27 has been appointed in this Chapter 11 Case.

1 On May 26, 2023, the Debtor filed the *Debtor’s Motion for an Order Establishing Procedures for*
2 *Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 70] (the
3 “Compensation Procedures Motion”). The Court granted the Compensation Procedures Motion on June
4 23, 2023, entering the *Order Authorizing Procedures for Interim Compensation and Reimbursement of*
5 *Expenses of Professionals* [Dkt. No. 170] (the “Original Compensation Procedures Order”). The Court
6 entered its *Agreed Order Amending Procedures for Interim Compensation and Reimbursement of*
7 *Expenses of Professionals* on June 27, 2025 [Dkt. No 2101] (the “Amended Compensation Procedures
8 Orders” and together with the Original Compensation Procedures Order, the “Compensation Procedures
9 Orders”).¹

10 On October 20, 2025, the Debtor filed the *Debtor’s Application to Employ Covington & Burling*
11 *LLP as Special Insurance Counsel* [Dkt. No. 2416] (the “Retention Application”). The Court approved
12 the Retention Application on November 12, 2025, entering the *Order Approving Debtor’s Application to*
13 *Employ Covington & Burling LLP as Special Insurance Counsel* [Dkt. No. 2450] (the “Covington
14 Retention Order”). A copy of the Covington Retention Order is attached hereto as **Exhibit A**.

15 On January 13, 2026, the Debtor filed the *Debtor’s Motion to Amend Order Establishing*
16 *Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 2560]
17 (the “Second Amended Compensation Procedures Motion”). On February 10, 2026, the Court entered
18 the *Order Approving Stipulation to Extend Time for Professionals to File Interim Fee Applications* [Dkt.
19 2629], extending the deadline for this Interim Application to February 24, 2026. On February 12, 2026,
20 the Court entered an order denying the Second Amended Compensation Procedures Motion without
21 prejudice. Dkt. No. 2632.

22 **III. SERVICES RENDERED**

23 In accordance with the *United States Bankruptcy Court for the Northern District of California*
24 *Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees* (the “Northern
25 District Guidelines”) and the Local Bankruptcy Rules for the Northern District of California (the “Local
26

27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in
28 the Compensation Procedures Orders.

1 Rules”), Covington has attempted to place the services performed in the category that best relates to the
2 service provided. However, because certain services affected multiple categories, services pertaining to
3 one category may occasionally be included in another category. The fact that similar services appear in
4 several categories did not result in any duplication of work or billing.

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

6
001 – General Insurance Advice
7
002 – Fee and Employment Applications

8 Covington’s invoices for the Interim Fee Period, which include a detailed breakdown of the time
9 entries and expenses incurred, are attached hereto as **Exhibit G**.

10 **A. General Insurance Advice (001)**

11 **Total Hours 221.80/Total Fees \$230,415.00**

12 During the Interim Fee Period, Covington analyzed insurance policies and coverage issues;
13 conducted research, drafted memoranda, contributed to strategy proposals, and communicated extensively
14 with parties in interest regarding insurance assignment, policy limit, settlement structure, and insurer
15 obligation issues; prepared for and participated in mediation discussions, other settlement negotiations,
16 hearings, and status conferences.

17 **B. Fee and Employment Applications (002)**

18 **Total Hours 6.30/Total Fees \$6,615.00**

19 During the Interim Fee Period, Covington prepared the retention application detailing Covington’s
20 experience in handling insurance coverage litigation matters. Covington also prepared the first monthly
21 fee statement, a certificate of non-objection to the first monthly fee statement, the second monthly fee
22 statement, a certificate of non-objection to the second monthly fee statement, the third monthly fee
23 statement, and a certificate of non-objection to the third monthly fee statement.

24 **IV. REIMBURSEMENT OF EXPENSES**

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

26 Covington advanced costs during the Interim Fee Period, including certain in-house charges in
27 connection with the performance of the services described in this Interim Application. During the
28 Interim Fee Period, Covington incurred and billed the Debtor a total of \$831.31 in expenses. As this

1 modest amount reflects, Covington made every effort to keep the costs in this case to a minimum. A
2 summary chart detailing the type and amount of expenses incurred during the Interim Fee period is
3 attached hereto as **Exhibit E**.

4 Covington does not charge for photocopying expenses, print jobs, or scanned copies. However, it
5 might sometimes be necessary for Covington to send large copying projects to an outside copy service
6 that charges a reduced rate for photocopying.

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

13 **V. COMPLIANCE WITH GUIDELINES**

14 **A. Hourly Rates**

15 The hourly rates of all professionals and paraprofessionals rendering services in this case are set
16 forth on the Billing Summary Charge on **Exhibit C** annexed hereto. As noted in Covington's retention
17 application and other documents, Covington's rates increase annually on January 1 of each year; provided,
18 however, that Covington has agreed to an alternative fee arrangement with the Debtor as set forth below.

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

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

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

26 Notice of the submission of this Interim Application and the hearing thereon will be provided to
27 the United States Trustee, the Debtor, the Official Committee of Unsecured Creditors, all parties
28 requesting special notice and other interested parties in accordance with the Bankruptcy Rules, Local

1 Bankruptcy Rules, and any applicable orders of the Court. Complete copies of the Interim Application
 2 will be promptly furnished to any other party upon specific request. Therefore, notice should be deemed
 3 adequate under the circumstances and in accordance with Federal Rules 2002(a)(6) and 2002(c)(2).
 4 Additionally, this Interim Application is available from the claims and noticing agent, KCC (d/b/a Verita
 5 Global), at no charge.

6 **D. No Agreement to Share Compensation**

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

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

11 Attached as **Exhibit B** through **Exhibit F** are the exhibits required by the Large Case Guidelines.
 12 In addition, pursuant to paragraph C.5 of the Large Case Guidelines, Covington provides the following
 13 statements:

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.	Yes – rather than charge its standard rates, Covington agreed to provide services to the Debtor at an all-attorney blended rate of \$1,050 per hour for the first three months of the engagement. Thereafter, at the Debtor’s option, Covington will render services to the Debtor (1) at an all-attorney blended rate of \$1,180 per hour, with non-attorney staff billed at a 10% discount from standard rates; or (2) at rates of \$1,695 per hour for senior attorneys, \$995 per hour for associates, and non-attorney staff at standard rates less a 10% discount.
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 this bankruptcy case?	No
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	No

1 editing billing records that would not be 2 compensable outside of bankruptcy and does not 3 include reasonable fees for preparing a fee 4 application.) If so, please quantify by hours and 5 fees.	
6 Does this fee application include time or fees for 7 reviewing time records to redact any privileged or 8 other confidential information? If so, please 9 quantify by hours and fees.	No
10 If the fee application includes any rate increases 11 since retention: 12 i. Did your client review and approve those 13 rate increases in advance? 14 ii. Did your client agree when retaining the 15 law firm to accept all future rate 16 increases? If not, did you inform your 17 client that they need not agree to modified 18 rates or terms in order to have you 19 continue the representation, consistent 20 with ABA Formal Ethics Opinion 11- 21 458?	N/A

VI. BASIS FOR ALLOWANCE OF FEES AND EXPENSES

Pursuant to section 330 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.

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).

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

1 case, (5) the customary fee, (6) whether fee is fixed or contingent, (7) time limitations imposed by the
2 client or the circumstances, (8) the amount involved and the results obtained, (9) the experience,
3 reputation, and ability of the professionals, (10) the undesirability of the case, (11) the nature and length
4 of the professional relationship with the client, and (12) awards in similar cases. *See American Benefit*
5 *Life Ins. Co. v. Baddock (In re First Colonial Corp. of America)*, 544 F.2d 1291 (5th Cir. 1977) (*Johnson*
6 *criteria applicable in bankruptcy cases*).

7 As set forth herein, the fees and expenses requested by this Interim Application reflect reasonable
8 compensation for actual, necessary services provided and reimbursement of actual, necessary expenses
9 incurred by Covington in acting as special insurance counsel to the Debtor during the Interim Fee Period.
10 Covington's fees and expenses are necessary and reasonable in light of the time, labor, and skills required
11 to address complex insurance issues in this case and the discounted alternative fee arrangement Covington
12 agreed to with the Debtor.

13 VII. CONCLUSION

14 Covington requests an interim allowance of all fees and costs for the Interim Fee Period.
15 Covington does not have any agreement or any understanding of any kind or nature to divide, pay over,
16 or share any portion of the fees to be awarded to Covington with any other person or attorney, except
17 among members of Covington.

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

21 WHEREFORE, Covington respectfully requests that the Court (a) authorize interim allowance and
22 direct payment of fees and costs, (b) award interim compensation to Covington in the amount of
23 \$237,901.31, inclusive of all fees and costs for the period from October 7, 2025 to December 31, 2025,
24 and (c) grant such other and further relief as may be appropriate under the circumstances.

25 //

26 //

27 //

28 //

1 DATED: February 20, 2026

COVINGTON & BURLING, LLP

2
3 By: /s/ Abigail V. O'Brient

4 Abigail V. O'Brient
5 1999 Avenue of the Stars, Suite 3500
6 Los Angeles, CA 90067

7 David B. Goodwin
8 Christine S. Haskett
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10 San Francisco, CA 94105

11 *Special Insurance Counsel for the Debtor*

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EXHIBIT A
COVINGTON RETENTION ORDER



1 **FOLEY & LARDNER LLP**
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 2 Tel: (415) 438-6469; eridley@foley.com
 Shane J. Moses (CA Bar No. 250533)
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 Ann Marie Uetz (admitted *pro hac vice*)
 4 Tel: (313) 234-7114; auetz@foley.com
 Matthew D. Lee (admitted *pro hac vice*)
 5 Tel: (608) 258-4203; mdlee@foley.com
 Geoffrey S. Goodman (admitted *pro hac vice*)
 6 Tel: (312) 832-4515; ggoodman@foley.com
 Mark C. Moore (admitted *pro hac vice*)
 7 Tel: (214) 999-4150; mmoore@foley.com
 555 California Street, Suite 1700
 8 San Francisco, CA 94104-1520

The following constitutes the order of the Court.
Signed: November 12, 2025

William J. Lafferty, III
U.S. Bankruptcy Judge

9 *Counsel for the Debtor*
10 *and Debtor in Possession*

11 **COVINGTON & BURLING, LLP**
 David B. Goodwin (CA Bar No. 104469)
 Tel: (415) 591-7074; dgoodwin@cov.com
 12 Christine S. Haskett (CA Bar No.188053)
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 13 Salesforce Tower, 415 Mission Street, Suite 5400
 San Francisco, CA 94105

14 *Proposed Special Insurance Counsel for*
15 *the Debtor*

16 **UNITED STATES BANKRUPTCY COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **OAKLAND DIVISION**

19 In re:
 20 THE ROMAN CATHOLIC BISHOP OF
 21 OAKLAND, a California corporation sole,
 22 Debtor.

Case No. 23-40523 WJL

Chapter 11

**ORDER APPROVING DEBTOR'S
APPLICATION TO EMPLOY COVINGTON
& BURLING LLP AS SPECIAL
INSURANCE COUNSEL**

Judge: Hon. William J. Lafferty

1 Upon the application [Docket No. 2416] (the "Application")¹ filed by The Roman Catholic Bishop
2 of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or
3 "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or the "Bankruptcy
4 Case"), pursuant to sections 327(a) and 1107 of the Bankruptcy Code and Bankruptcy Rules 2014 and
5 2016, for entry of an order authorizing the employment and retention of Covington & Burling LLP
6 ("Covington") to represent the Debtor as special insurance counsel, on the terms described in the
7 Application and as more fully set forth therein; and due and proper notice of the Application having been
8 given; and the Court having found that it has jurisdiction over this matter under 28 U.S.C. §§ 157 and
9 1334, that this is a core proceeding under 28 U.S.C. §§ 157(a)-(b) and 1334(b), and that venue is proper
10 before this Court under 28 U.S.C. §§ 1408 and 1409; and the Court being satisfied, based on the
11 representations made in the Application and the Declaration of David B. Goodwin in support thereof, that
12 Covington does not hold or represent any interest adverse to the Debtor's estate in the above-captioned
13 case and is disinterested under section 101(14) and meets the requirements for employment under section
14 327(a) of the Bankruptcy Code; and the Court finding that cause exists for the entry of this Order
15 authorizing the employment of Covington as special insurance counsel for the Debtor effective as of
16 October 7, 2025, including that such employment is in the best interests of the Debtor's estate;

17 **IT IS HEREBY ORDERED** that:

- 18 1. The Application is APPROVED as set forth in this Order.
- 19 2. The Debtor is authorized to retain and employ Covington as its special insurance counsel
20 effective as of October 7, 2025, under the terms set forth in the Application.
- 21 3. Covington's compensation and reimbursement in respect to its fees and expenses incurred
22 representing the Debtor shall be subject to further order of the Court in accordance with the procedures
23 and standards set forth in sections 330 and 331 of the Bankruptcy Code, such Federal Rules of Bankruptcy
24 Procedure and local rules as may be applicable from time to time, and such procedures as may be fixed
25 by order of this Court, as well as the *United States Bankruptcy Court Northern District of California*
26 *Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees*, effective
27

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

1 *February 19, 2014, and the U.S. Trustee Guidelines for Reviewing Applications for Compensation and*
2 *Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases,*
3 *effective November 1, 2013.*

4 4. Notwithstanding anything to the contrary in this Order or the Application, the Court is not
5 approving terms and conditions of Covington’s employment under 11 U.S.C. § 328(a).

6 5. In the event of any inconsistency between the Application and this Order, this Order shall
7 govern.

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

10 *** END OF ORDER ***

COURT SERVICE LIST

All ECF Recipients.

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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 Rate	
	BILLED Firm for preceding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner ²	\$1,278.24	\$1,050.00
Associate ³	\$874.81	\$1,050.00
Paralegal	\$700.00	\$800.00
All timekeepers aggregated	\$1,038.92	\$1,039.15

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-bk-40523
Applicant's Name: Covington & Burling LLP
Date of Application: February 20, 2026
Interim or Final: Interim

² Partner category includes Of Counsel.

³ Associate category includes Senior Counsel and Special Counsel.

EXHIBIT C

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

Name of Professional Individual	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Joseph R. Dunn	Partner, 2005	\$1,050.00	2.00	\$2,100.00
Christine Saunders Haskett	Partner, 1997	\$1,050.00	101.80	\$106,890.00
Abigail V. O'Brient	Partner, 2009	\$1,050.00	17.20	\$18,060.00
David Goodwin	Senior Counsel, 1982	\$1,050.00	33.80	\$35,490.00
Aja I. Johnson	Associate, 2025	\$1,050.00	9.30	\$9,765.00
Sabrina T. McGraw	Associate, 2021	\$1,050.00	14.40	\$15,120.00
Julia C. Philips Roth	Associate, 2019	\$1,050.00	39.70	\$41,685.00
E. Tracy Brown	Paralegal, N/A	\$800.00	9.90	\$7,920.00
TOTAL			228.10	\$237,030.00

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-bk-40523
Applicant's Name: Covington & Burling LLP
Date of Application: February 20, 2026
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 for Fee Statement
001 – General Insurance Advice	221.80	\$230,415.00
002 – Fee and Employment Applications	6.30	\$6,615.00
TOTAL	228.10	\$237,030.00

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-bk-40523
Applicant’s Name: Covington & Burling LLP
Date of Application: February 20, 2026
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
Electronic Legal Research Services	\$788.81
Other – Monthly Disk Storage	\$40.50
Parking	\$32.00
Telephone Calls	\$10.00
TOTAL	\$871.31

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-bk-40523
Applicant’s Name: Covington & Burling LLP
Date of Application: February 20, 2026
Interim or Final: Interim

EXHIBIT F

COVINGTON BUDGET AND STAFFING PLAN

The Covington attorneys staffed on this case, subject to modification depending on further development, are set forth in (1) the Declaration of Attila Bardos in Support of Debtor’s Application to Employ Covington & Burling LLP as Special Insurance Counsel Pursuant to 11 U.S.C. 327(a), 330, 331, & 1107, and Rules 2014 and 2016 of the Federal Rules and Bankruptcy Procedure, and (2) supplemented as set forth in Exhibit C of this Interim Application, and the Debtor has approved that staffing.

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EXHIBIT G

COVINGTON INVOICES

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COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

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Matthew Kemner
General Counsel, Roman Catholic
Diocese of Oakland
Roman Catholic Diocese of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

November 19, 2025

Invoice No.: 61161090
Account: 048691.00001

Roman Catholic Bishop of Oakland

Re: General Insurance Advice

For professional services rendered in connection with the above referenced matter through
October 31, 2025:

Fees: \$ 32,235.00

Disbursements:

Westlaw Research \$ 23.20

Disbursements \$ 23.20

Total Fees and Disbursements: \$ 32,258.20

TOTAL AMOUNT DUE: \$ 32,258.20

Time Detail

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L100 - CASE ASSESSMENT, DEVELOPMT., ADM				
10/07/25	David Goodwin	Conference call with the mediation team.	0.20	\$210.00
10/08/25	David Goodwin	Conference call with the mediation team (.10); telephone conference with Mr. Burns (.20).	0.30	\$315.00
Subtotal:	L100 - CASE ASSESSMENT, DEVELOPMT., ADM		0.50	\$525.00
L120 - Analysis/Strategy				
10/23/25	Christine Saunders Haskett	Telephone conference with client and bankruptcy counsel re insurance strategy and prior correspondence with insurer (.60); emails regarding insurance coverage issues (.50).	1.10	\$1,155.00
10/23/25	David Goodwin	Emails regarding insurance strategy issues (.10); telephone call with Mr. Kemner regarding settlement issues (.10); follow on from the call with Mr. Kemner (.10).	0.30	\$315.00
10/24/25	Christine Saunders Haskett	Review and analyze draft letter to insurer.	0.80	\$840.00
10/24/25	David Goodwin	Emails regarding defense counsel issues (.10); revise draft letter to Travelers (1.10).	1.20	\$1,260.00
10/25/25	Christine Saunders Haskett	Review and revise draft letter to insurer (0.3); review and respond to emails re same (0.3).	0.60	\$630.00
10/26/25	Christine Saunders Haskett	Review and revise draft letter to insurer (0.85) and review and respond to emails re same (0.85).	1.70	\$1,785.00
10/26/25	David Goodwin	Revise draft letter to Travelers.	0.20	\$210.00
10/27/25	Christine Saunders Haskett	Telephone conference and email with client and bankruptcy counsel re strategy issues in connection with correspondence with insurers and independent counsel issues (.70); draft letters to insurers re settlement obligations and bad faith (3.70).	4.40	\$4,620.00
10/27/25	David Goodwin	Conference call with Mr. Kemner and the Foley team regarding insurance issues (.70); analyze insurance issues (.20); revise draft "insurance bad faith" letter (.10).	1.00	\$1,050.00
10/28/25	Christine Saunders	Email with insurer counsel re settlement and defense issues (.30); telephone with team and	2.40	\$2,520.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
	Haskett	client re strategy in connection with same (1.10); emails re same (.30).		
10/28/25	David Goodwin	Emails with regards to duty to defend issues.	0.10	\$105.00
10/29/25	Christine Saunders Haskett	Telephone and email with client and team re insurance strategy issues (.60); review and analyze court filing re same (1.10).	1.70	\$1,785.00
10/29/25	Abigail V. O'Brient	Confer regarding insurance strategy (.5); monitor hearing on dismissal with respect to insurance-related matters (2.4); email update to insurance team re same (.3).	3.20	\$3,360.00
10/29/25	David Goodwin	Analyze coverage and litigation issues.	0.70	\$735.00
10/30/25	Christine Saunders Haskett	Review and analyze insurance documents provided by bankruptcy counsel.	0.60	\$630.00
10/30/25	Christine Saunders Haskett	Review and analyze settlement and insurance strategy issues (2.0); telephone conferences and email with client, team, and bankruptcy counsel re same (.50).	2.50	\$2,625.00
10/30/25	Abigail V. O'Brient	Emails with D. Goodwin and C. Haskett re insurance issues.	0.20	\$210.00
10/30/25	David Goodwin	Conference call with Mr. Kemner regarding settlement issues (.50); analyze issues discussed during the call (.20); emails re same (.10).	0.80	\$840.00
10/31/25	Christine Saunders Haskett	Telephone conference and email with team, client, and bankruptcy counsel re settlement strategy and considerations and communications with mediator.	1.40	\$1,470.00
10/31/25	Abigail V. O'Brient	Call with client re insurance assignment (.5); follow up communications re same (.8); confer with J. Philips Roth re preparation of memorandum on issues related to insurance assignment (.5).	1.80	\$1,890.00
10/31/25	David Goodwin	Comment on draft email to the mediator (.10) ; conference call regarding settlement issues (.50); follow on from conference call to analyze settlement issues (.20).	0.80	\$840.00
10/31/25	Julia C. Philips Roth	Draft memorandum regarding insurance assignment.	2.10	\$2,205.00
10/31/25	Julia C. Philips Roth	Call with A. O'Brient re insurance assignment research and memorandum.	0.60	\$630.00
Subtotal:	L120 - Analysis/Strategy		30.20	\$31,710.00

Roman Catholic Bishop of Oakland

General Insurance Advice

048691.00001

Invoice No.: 61161090

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
Total			30.70	\$32,235.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Haskett, Christine Saunders	Partner	17.20	1,050.00	\$ 18,060.00
O'Brient, Abigail V.	Partner	5.20	1,050.00	\$ 5,460.00
Goodwin, David	Senior Counsel	5.60	1,050.00	\$ 5,880.00
Philips Roth, Julia C.	Associate	2.70	1,050.00	\$ 2,835.00
Totals		30.70		\$ 32,235.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Amount</u>
L120	Analysis/Strategy	\$31,710.00
L100	CASE ASSESSMENT, DEVELOPMT., ADM	\$525.00

Disbursement Summary

<u>Description</u>	<u>Amount</u>
Westlaw Research	\$ 23.20
Totals	\$ 23.20

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
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Roman Catholic Bishop of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

November 19, 2025

Invoice No.: 61161171
Account: 048691.00002

Roman Catholic Bishop of Oakland

Re: Fee and Employment Applications

For professional services rendered in connection with the above referenced matter through
October 31, 2025:

Fees: \$ **3,780.00**

TOTAL AMOUNT DUE: \$ **3,780.00**

Time Detail

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L250 - Other Written Motions & Submissions				
10/08/25	Abigail V. O'Brient	Emails internally and with Foley re employment of Covington as special insurance counsel.	0.50	\$525.00
10/14/25	Abigail V. O'Brient	Further revise conflicts disclosure for employment application.	0.20	\$210.00
10/16/25	Abigail V. O'Brient	Revise employment application (1.1); revise supporting declaration (0.7).	1.80	\$1,890.00
10/16/25	David Goodwin	Draft application to serve as coverage counsel (.20); communications with Mr. Kemner regarding application (.10).	0.30	\$315.00
10/17/25	David Goodwin	Revise draft fee application.	0.40	\$420.00
10/29/25	David Goodwin	Emails regarding bankruptcy filings regarding appointment as counsel.	0.10	\$105.00
Subtotal:	L250 - Other Written Motions & Submissions		3.30	\$3,465.00
L430 - Written Motions and Submissions				
10/17/25	Abigail V. O'Brient	Review and comment on revised draft of Covington employment application from Foley and supporting declarations.	0.30	\$315.00
Subtotal:	L430 - Written Motions and Submissions		0.30	\$315.00
Total			3.60	\$3,780.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>		<u>Amount</u>
O'Brient, Abigail V.	Partner	2.80	1,050.00	\$	2,940.00
Goodwin, David	Senior Counsel	0.80	1,050.00	\$	840.00
Totals		3.60		\$	3,780.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Amount</u>
L250	Other Written Motions & Submissions	\$3,465.00
L430	Written Motions and Submissions	\$315.00

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
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Matthew Kemner
General Counsel, Roman Catholic
Diocese of Oakland
Roman Catholic Diocese of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

December 19, 2025

Invoice No.: 61166226
Account: 048691.00001

Roman Catholic Bishop of Oakland

Re: General Insurance Advice

For professional services rendered in connection with the above referenced matter through
November 30, 2025:

Fees:	\$ 120,900.00
Disbursements:	
Westlaw Research	\$ 355.66
Lexis Research	\$ 225.70
Monthly Disk Storage	\$ 20.60
Disbursements	\$ 601.96
Total Fees and Disbursements:	\$ 121,501.96
 TOTAL AMOUNT DUE:	 \$ 121,501.96

Time Detail

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L110 - Fact Investigation/Development				
11/03/25	Sabrina T. McGraw	Analyze and assess policy coverages.	0.60	\$630.00
11/04/25	Sabrina T. McGraw	Analyze insurance policies and draft coverage chart.	0.40	\$420.00
11/05/25	Sabrina T. McGraw	Analyze policies for coverage chart.	0.40	\$420.00
11/07/25	E. Tracy Brown	Review documentation of insurance issued to the Diocese of Oakland; prepare register of policies.	5.70	\$4,560.00
11/10/25	Sabrina T. McGraw	Analyze coverage chart and correspond with team re missing policy periods.	1.10	\$1,155.00
11/19/25	Sabrina T. McGraw	Analyze insurer communications re claim.	0.50	\$525.00
11/19/25	E. Tracy Brown	Prepare chart of known coverage issued to the Roman Catholic Bishop of Oakland from 1963-2022.	4.20	\$3,360.00
11/24/25	Sabrina T. McGraw	Analyze policies and conference with team re same.	0.90	\$945.00
11/25/25	Aja I. Johnson	Research status of The Ordinary Mutual insurance company and whether it is a successor to the National Catholic Risk Retention Group (0.4); relay findings to David Goodwin (0.2).	0.60	\$630.00
11/26/25	Aja I. Johnson	Review folder containing insurance policies to ascertain amounts of coverage and whether there are aggregate limits in each policy (1.5); identify gaps/missing policies to locate/identify later (0.5).	2.00	\$2,100.00
Subtotal:	L110 - Fact Investigation/Development		16.40	\$14,745.00
L120 - Analysis/Strategy				
11/01/25	Christine Saunders Haskett	Review and analyze insurance documents received from bankruptcy counsel.	0.70	\$735.00
11/03/25	David Goodwin	Comment on draft Westport settlement term sheet (.30); analyze Employers' Reinsurance coverage (.30).	0.60	\$630.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/03/25	Julia C. Philips Roth	Legal research re insurance assignment issues	3.60	\$3,780.00
11/04/25	David Goodwin	Telephone with Mr. Kemner regarding settlement issues (.20); revise draft letters to insurers (.10); comment on insurer communications (.10).	0.40	\$420.00
11/04/25	Julia C. Philips Roth	Draft memorandum re insurance assignment issues	4.30	\$4,515.00
11/04/25	Julia C. Philips Roth	Legal research re insurance assignment issues	2.80	\$2,940.00
11/05/25	Christine Saunders Haskett	Telephone with team re insurance policy analysis.	0.10	\$105.00
11/05/25	Abigail V. O'Brient	Review and revise memo on insurance assignment issues.	0.40	\$420.00
11/05/25	David Goodwin	Comment on coverage issues.	0.10	\$105.00
11/05/25	Julia C. Philips Roth	Draft and revise memorandum re insurance assignment considerations	4.80	\$5,040.00
11/06/25	Christine Saunders Haskett	Review and revise draft memo re insurance assignment issues and review and respond to emails re coverage strategy issues.	2.50	\$2,625.00
11/06/25	David Goodwin	Draft memorandum on insurance-related bankruptcy issues.	1.10	\$1,155.00
11/06/25	Julia C. Philips Roth	Legal research and analysis re impact of bankruptcy claim allowance on rights to direct actions against insurers under California law	4.40	\$4,620.00
11/07/25	Christine Saunders Haskett	Review and respond to emails re insurance assignment memo.	0.30	\$315.00
11/10/25	Christine Saunders Haskett	Telephone with client re strategy for corresponding with insurers and revise memo re assignment strategy issues.	1.10	\$1,155.00
11/10/25	Abigail V. O'Brient	Finalize memo re insurance assignment.	0.20	\$210.00
11/10/25	David Goodwin	Revise draft memorandum regarding insurance-related bankruptcy issues (.40); analyze issues regarding coverage for suits filed after 1984 (.40).	0.80	\$840.00
11/10/25	Julia C. Philips Roth	Revise memorandum re insurance assignment and related bankruptcy issues	0.90	\$945.00
11/11/25	Christine	Review and respond to emails re potential	1.40	\$1,470.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
	Saunders Haskett	coverage gaps and associated strategy issues.		
11/11/25	David Goodwin	Telephone with Mr. Kemner regarding strategy issues (.40); follow on from call (.40) .	0.80	\$840.00
11/12/25	Joseph R. Dunn	Monitor hearing on motion to dismiss re insurance-facing issues (.6); report out to internal team (.3).	0.90	\$945.00
11/12/25	Christine Saunders Haskett	Review and analyze register of policies and bankruptcy counsel's coverage analysis in connection with issue of potentially uncovered claims.	1.30	\$1,365.00
11/12/25	Christine Saunders Haskett	Conference re strategy for maximizing insurance coverage.	0.40	\$420.00
11/13/25	Christine Saunders Haskett	Review and respond to emails re strategy issues in connection with maximizing availability of insurance coverage.	1.40	\$1,470.00
11/13/25	Christine Saunders Haskett	Telephone conference with client re insurance coverage strategy issues.	0.70	\$735.00
11/13/25	David Goodwin	Conference call with Mr. Kemner regarding insurance issues (.70); revise draft request for insurance information (.20); comment on draft email regarding insurance strategy (.10) .	1.00	\$1,050.00
11/14/25	Christine Saunders Haskett	Review and respond to emails re coverage strategy issues.	0.50	\$525.00
11/14/25	Christine Saunders Haskett	Revise draft letter to insurers re settlement demands from claimants.	0.40	\$420.00
11/14/25	David Goodwin	Revise draft letter to insurers.	0.20	\$210.00
11/16/25	Christine Saunders Haskett	Revise draft letter to insurers re settlement demands from claimants.	0.40	\$420.00
11/17/25	Christine Saunders Haskett	Revise draft letter to insurers re policy limits demands.	0.40	\$420.00
11/17/25	Christine Saunders Haskett	Conference and email with team and client re insurance strategy issues in connection with maximizing insurer contributions to potential global settlement.	2.70	\$2,835.00
11/17/25	Christine	Analyze coverage and underlying claims to	2.00	\$2,100.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
	Saunders Haskett	determine extent of potentially uncovered claims, for purposes of exposure analysis.		
11/17/25	Christine Saunders Haskett	Revise draft letter to insurer re defense of underlying case and email re same.	0.70	\$735.00
11/17/25	David Goodwin	Prepare for meeting with Mr. Kemner regarding coverage issues (.30); attend meeting with Mr. Kemner (1.90); comment on draft letter to insurers (.10) .	2.30	\$2,415.00
11/17/25	Sabrina T. McGraw	Analyze policy limit demand communications; conference with M. Kemner re claim strategy; analyze Foley's coverage analysis and assess continuous trigger assessment; review draft letter to Lauren Macksoud.	2.90	\$3,045.00
11/18/25	Christine Saunders Haskett	Telephone and email with client re strategy for corresponding with insurers re settlement issues.	0.90	\$945.00
11/18/25	Christine Saunders Haskett	Review and analyze correspondence from insurers re settlement demands.	2.30	\$2,415.00
11/18/25	Christine Saunders Haskett	Email with team re coverage strategy and open issues.	1.20	\$1,260.00
11/18/25	Abigail V. O'Brient	Emails with C. Haskett re committee standing to assert policy limits demand.	0.50	\$525.00
11/18/25	David Goodwin	Analyze the claims made coverage (.10); analyze Chubb coverage (.10); comment on coverage issues (.20); emails regarding settlement issues (.10); analyze correspondence with insurers (.40); comment on issues involving the Chubb excess coverage (.2).	1.10	\$1,155.00
11/18/25	Sabrina T. McGraw	Analyze coverage correspondence with insurers regarding claims and assess against coverage chart and related Foley coverage analysis.	7.40	\$7,770.00
11/19/25	Christine Saunders Haskett	Review and analyze correspondence with insurers (1.5); draft follow-on letters to insurers re obligation to agree to reasonable settlement (1.4).	2.90	\$3,045.00
11/19/25	Christine Saunders Haskett	Telephone and email with client re strategy for maximizing insurer contribution to settlement.	0.70	\$735.00
11/19/25	Christine Saunders	Review and analyze potential coverage available for claims made periods (0.4); review	0.80	\$840.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
	Haskett	and respond to emails re same (0.4).		
11/19/25	David Goodwin	Analyze coverage issues (.90); emails regarding settlement issues (.30).	1.20	\$1,260.00
11/20/25	Christine Saunders Haskett	Prepare letters to insurers re settlement obligations, taking into account insurer arguments re coverage (1.6); telephone and email with client and bankruptcy counsel re same (0.8).	2.40	\$2,520.00
11/20/25	Christine Saunders Haskett	Telephone conference with client and bankruptcy counsel re status of disputes with insurers.	0.50	\$525.00
11/20/25	Christine Saunders Haskett	Email with team, client, and bankruptcy counsel re communications with mediator re insurance issues.	1.20	\$1,260.00
11/20/25	Abigail V. O'Brient	Emails with C. Haskett and D. Goodwin re committee standing issues with respect to insurance.	0.50	\$525.00
11/20/25	David Goodwin	Conference call with Mr. Kemner and Foley regarding insurance coverage issues (.50); conference regarding Ordinary Mutual coverage (.40); revise draft email regarding mediation issues (.20); revise draft letter to Travelers (.10); revise draft email from Mr. Kemner to the mediators (.20); analyze issues regarding communications to mediation team (.30); emails with Mr. Kemner regarding insurance issues (.20).	1.90	\$1,995.00
11/20/25	Aja I. Johnson	Meet with David Goodwin to discuss tracking down status of insurance provider and locating insurance policies from SF and Oakland diocese for years prior.	0.50	\$525.00
11/20/25	Sabrina T. McGraw	Analyze insurer communications re claim.	0.20	\$210.00
11/21/25	Christine Saunders Haskett	Review and analyze policy limits issues (0.5); review and respond to emails re same (0.5).	1.00	\$1,050.00
11/21/25	David Goodwin	Analyze insurance coverage issues.	1.20	\$1,260.00
11/21/25	Aja I. Johnson	Conduct research into the status of Ordinary Mutual insurance company.	0.70	\$735.00
11/22/25	Christine Saunders Haskett	Telephone conference with client and Committee counsel re policy limits issues and email re same.	1.00	\$1,050.00
11/22/25	David Goodwin	Emails regarding policy limits issues.	0.10	\$105.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/23/25	Julia C. Philips Roth	Confer with A. O'Brient re follow-up question from client re debtor insurance assignments	0.20	\$210.00
11/23/25	Julia C. Philips Roth	Analyze follow-up question from client re debtor insurance assignments	0.20	\$210.00
11/24/25	Joseph R. Dunn	Review filings by debtor, committee re dismissal and emails re insurance issues.	0.30	\$315.00
11/24/25	Christine Saunders Haskett	Telephone conference with team re policy review to determine limits and applicable policy periods.	0.60	\$630.00
11/24/25	Christine Saunders Haskett	Review and respond to emails re insurance assignment issues.	0.40	\$420.00
11/24/25	Abigail V. O'Brient	Analyze potential partial assignment of insurance (.4); email to client re same (.3).	0.70	\$735.00
11/24/25	David Goodwin	Attend conference call regarding calculation of policy limits issues (.60); analyze 1970s-era policies for coverage issues (.50).	1.10	\$1,155.00
11/24/25	Aja I. Johnson	Prepare for RCBO call to discuss status of locating insurance policies for the Roman Catholic Bishop of Oakland (0.4); send emails to David Goodwin about same (0.2); attend call about same (0.2).	0.80	\$840.00
11/24/25	Aja I. Johnson	Complete research into the status of The Ordinary Mutual insurance company (0.8); relay findings to David Goodwin via email (0.4).	1.20	\$1,260.00
11/24/25	Julia C. Philips Roth	Draft analysis re insurance assignment structures in chapter 11 plans	2.10	\$2,205.00
11/24/25	Julia C. Philips Roth	Legal research re insurance assignment structures in chapter 11 plans	4.80	\$5,040.00
11/25/25	Christine Saunders Haskett	Telephone with insurer counsel re defense of underlying matters and email client re same.	0.40	\$420.00
11/25/25	Christine Saunders Haskett	Review and respond to emails re insurance assignment issues.	0.50	\$525.00
11/25/25	David Goodwin	Emails regarding coverage issues (.10); analyze policy assignment issues (.20).	0.30	\$315.00
11/25/25	Julia C. Philips Roth	Respond to client questions re insurance assignment issues	1.00	\$1,050.00
11/26/25	Christine Saunders Haskett	Email with team and client re insurance assignment issues and related strategy.	1.10	\$1,155.00

Roman Catholic Bishop of Oakland

General Insurance Advice

048691.00001

Invoice No.: 61166226

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/26/25	David Goodwin	Emails regarding mediators' proposal (.20); comment on potential insurance settlement strategies (.20).	0.40	\$420.00
11/26/25	Julia C. Philips Roth	Communicate with D. Goodwin and C. Haskett re insurance assignment provisions of Madison Square chapter 11 plan	1.50	\$1,575.00
11/26/25	Julia C. Philips Roth	Analyze term sheet and insurance assignment provisions of Madison Square plan incorporated therein by reference	0.70	\$735.00
Subtotal: L120 - Analysis/Strategy			98.00	\$102,900.00
L160 - Settlement/Non-Binding ADR				
11/03/25	Christine Saunders Haskett	Review and analyze insurance policy language in connection with proposed settlement terms from insurer and telephone and email with team and client re same.	1.70	\$1,785.00
11/04/25	Christine Saunders Haskett	Draft letters to insurers re settlement issues and telephone and email with client and team re same.	1.40	\$1,470.00
Subtotal: L160 - Settlement/Non-Binding ADR			3.10	\$3,255.00
Total			117.50	\$120,900.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Dunn, Joseph R.	Partner	1.20	1,050.00	\$ 1,260.00
Haskett, Christine Saunders	Partner	38.00	1,050.00	\$ 39,900.00
O'Brient, Abigail V.	Partner	2.30	1,050.00	\$ 2,415.00
Goodwin, David	Senior Counsel	14.60	1,050.00	\$ 15,330.00
Johnson, Aja I.	Associate	5.80	1,050.00	\$ 6,090.00
McGraw, Sabrina T.	Associate	14.40	1,050.00	\$ 15,120.00
Philips Roth, Julia C.	Associate	31.30	1,050.00	\$ 32,865.00
Brown, E. Tracy	Paralegal	9.90	800.00	\$ 7,920.00
Totals		117.50		\$ 120,900.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Amount</u>
L120	Analysis/Strategy	\$102,900.00
L110	Fact Investigation/Development	\$14,745.00
L160	Settlement/Non-Binding ADR	\$3,255.00

Disbursement Summary

<u>Description</u>	<u>Amount</u>
Monthly Disk Storage	\$ 20.60
Lexis Research	\$ 225.70
Westlaw Research	\$ 355.66
Totals	\$ 601.96

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
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Covington & Burling LLP
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Roman Catholic Bishop of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

December 16, 2025

Invoice No.: 61165923
Account: 048691.00002

Roman Catholic Bishop of Oakland

Re: Fee and Employment Applications

For professional services rendered in connection with the above referenced matter through
November 30, 2025:

Fees: \$ **1,995.00**

TOTAL AMOUNT DUE: \$ **1,995.00**

Time Detail

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120 - Analysis/Strategy				
11/11/25	Abigail V. O'Brient	Numerous emails with Foley re retention of Covington as special insurance counsel and delay in court's approval of same.	0.50	\$525.00
11/12/25	Abigail V. O'Brient	Numerous emails with Foley re failure to request entry of order authorizing retention of Covington as special insurance counsel.	0.60	\$630.00
Subtotal:	L120 - Analysis/Strategy		1.10	\$1,155.00
L250 - Other Written Motions & Submissions				
11/26/25	Julia C. Philips Roth	Draft special counsel monthly fee statement.	0.80	\$840.00
Subtotal:	L250 - Other Written Motions & Submissions		0.80	\$840.00
Total			1.90	\$1,995.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>		<u>Amount</u>
O'Brient, Abigail V.	Partner	1.10	1,050.00	\$	1,155.00
Philips Roth, Julia C.	Associate	0.80	1,050.00	\$	840.00
Totals		1.90		\$	1,995.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Amount</u>
L120	Analysis/Strategy	\$1,155.00
L250	Other Written Motions & Submissions	\$840.00

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
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Matthew Kemner
General Counsel, Roman Catholic
Diocese of Oakland
Roman Catholic Diocese of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

January 29, 2026

Invoice No.: 61171789
Account: 048691.00001

Roman Catholic Bishop of Oakland

Re: General Insurance Advice

For professional services rendered in connection with the above referenced matter through
December 31, 2025:

Fees:	\$ 77,280.00
Disbursements:	
Computer Research	\$ 54.10
Westlaw Research	\$ 127.35
Telephone Calls	\$ 10.00
Parking	\$ 32.00
Monthly Disk Storage	\$ 19.90
Disbursements	\$ 243.35
Total Fees and Disbursements:	\$ 77,523.35
 TOTAL AMOUNT DUE:	 \$ 77,523.35

Time Detail

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L120 - Analysis/Strategy				
12/01/25	Christine Saunders Haskett	Review and respond to emails from client re insurance assignment issues and strategy.	1.40	\$1,470.00
12/01/25	David Goodwin	Emails regarding insurance recovery issues (0.1); emails regarding assignment of insurance proceeds (0.6).	0.70	\$735.00
12/01/25	Julia C. Philips Roth	Research and respond to client questions re insurance assignment issues	0.80	\$840.00
12/02/25	Christine Saunders Haskett	Email with team re policy limits issues.	0.30	\$315.00
12/02/25	Aja I. Johnson	Compile information regarding general and aggregate limits in each policy within client folder, and assess whether a policy is annualized.	2.80	\$2,940.00
12/03/25	Christine Saunders Haskett	Telephone conference with client re mediation and insurance recovery strategy issues.	0.90	\$945.00
12/03/25	Christine Saunders Haskett	Review and analyze results of policy limits review (0.7); telephone and email re strategy in connection with same (0.5).	1.20	\$1,260.00
12/03/25	David Goodwin	Analyze issues regarding coverage available to fund a settlement (1.5); conference call with Mr. Kemner re same (0.9).	2.40	\$2,520.00
12/04/25	Christine Saunders Haskett	Review and analyze policy limits and language issues (1.6); telephone conference and email with team re same (0.8).	2.30	\$2,415.00
12/04/25	Christine Saunders Haskett	Email insurer re defense of underlying suit (0.4); telephone with client re same (0.4).	0.80	\$840.00
12/04/25	Christine Saunders Haskett	Revise draft letters to insurers re settlement obligations (0.8); telephone and email re same (0.2).	1.00	\$1,050.00
12/04/25	David Goodwin	Emails regarding settlement issues (0.1); conference call with Mr. Gallagher (0.6); conference call with Mr. Kemner (0.3); draft settlement term sheet (0.4); conference regarding insurance policy issues (0.8); attend conference call with Mr. Kemner regarding	2.40	\$2,520.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		Woodall defense issues (0.2).		
12/04/25	Aja I. Johnson	Meeting with Christine Haskett and David Goodwin to discuss coverage limits in RCBO insurance policies.	0.70	\$735.00
12/05/25	Christine Saunders Haskett	Review and respond to emails re communications with insurers and mediator.	0.40	\$420.00
12/05/25	David Goodwin	Revise draft email to Mr. Gallagher (.10); emails regarding settlement issues (.10).	0.20	\$210.00
12/07/25	Christine Saunders Haskett	Revise draft letters to insurers re exposure issues.	0.90	\$945.00
12/07/25	Christine Saunders Haskett	Review and analyze insurance policies in connection with limits of liability issues.	1.10	\$1,155.00
12/07/25	David Goodwin	Emails regarding settlement issues.	0.10	\$105.00
12/08/25	Joseph R. Dunn	Analysis of settlement structure issues 0.3); confer internally re same (0.3).	0.60	\$630.00
12/08/25	Christine Saunders Haskett	Prepare for and participate in telephone conference with insurer re defense of underlying matter.	1.10	\$1,155.00
12/08/25	Christine Saunders Haskett	Draft letter to insurer re defense of underlying matter and email re same.	0.90	\$945.00
12/08/25	Christine Saunders Haskett	Telephone conference with bankruptcy counsel re potential split of insurance proceeds and effect on confirmation of plan.	0.40	\$420.00
12/08/25	Abigail V. O'Brien	Confer with J. Dunn re client question re settlement structure (0.3); confer with C. Haskett and D. Goodwin re potential staged settlement (0.4); email to client re same (0.3).	1.00	\$1,050.00
12/08/25	David Goodwin	Conference regarding settlement issues (0.2); emails regarding same (0.2); analyze insurer communications (0.1) .	0.50	\$525.00
12/09/25	Christine Saunders Haskett	Telephone conference and email with team and client re strategies for submitting proposed term sheet to bankruptcy court.	1.50	\$1,575.00
12/09/25	Christine Saunders Haskett	Review and analyze insurance policies and assessments of per occurrence and aggregate limits and update records re same.	3.40	\$3,570.00
12/09/25	Christine Saunders	Review and revise proposed term sheet (0.4); email re same (0.1).	0.50	\$525.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
	Haskett			
12/09/25	David Goodwin	Emails regarding policy limits issues (0.2); conference regarding settlement issues (0.2); analyze insurer settlement issues (0.9); revise draft insurance section of plan term sheet (0.1).	1.40	\$1,470.00
12/09/25	Julia C. Philips Roth	Call with A. O'Brient re plan term sheet insurance assignment issues (0.3), analyze status conference transcript and prior docket filings re related issues (0.6).	0.90	\$945.00
12/10/25	Christine Saunders Haskett	Telephone and email with client and bankruptcy counsel re insurance assignment issues and strategy.	0.50	\$525.00
12/10/25	Christine Saunders Haskett	Review and respond to emails re insurance strategy in connection with bankruptcy plan.	0.80	\$840.00
12/10/25	David Goodwin	Emails regarding settlement issues.	0.10	\$105.00
12/10/25	Julia C. Philips Roth	Revise fourth amended plan term sheet with respect to insurance assignment issues (0.9); analysis re same (0.9).	1.80	\$1,890.00
12/11/25	Christine Saunders Haskett	Email with team re proposed term sheet and implications for insurance recoveries.	0.80	\$840.00
12/11/25	David Goodwin	Analyze proposed term sheet (0.1); emails regarding settlement issues (0.2) .	0.30	\$315.00
12/12/25	Christine Saunders Haskett	Telephone with client re current status and plan for next steps (0.3); telephone conference and email with team re same (0.9); prepare proposal for steps to be taken post-bankruptcy dismissal and email with team re same (1.1).	2.30	\$2,415.00
12/12/25	David Goodwin	Conference regarding bankruptcy plan issues relating to insurance assignment (0.4); draft litigation plan (0.2).	0.60	\$630.00
12/13/25	Joseph R. Dunn	Emails re settlement structure for insurance preservation.	0.20	\$210.00
12/13/25	Christine Saunders Haskett	Prepare proposal for steps to be taken post-dismissal of bankruptcy and email with team re same.	0.90	\$945.00
12/14/25	Christine Saunders Haskett	Prepare proposal for steps to be taken post-bankruptcy dismissal and email with team re same.	1.10	\$1,155.00
12/14/25	Christine Saunders	Legal research re strength of insurer coverage defenses.	0.90	\$945.00

General Insurance Advice

048691.00001

Invoice No.: 61171789

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
	Haskett			
12/15/25	Christine Saunders Haskett	Revise strategy proposal for insurance recoveries and telephone and email with client re same (1.6); review and respond to emails re case developments and next steps (0.6).	2.20	\$2,310.00
12/15/25	David Goodwin	Draft proposal for litigation strategy (0.5); respond to questions from Mr. Kemner regarding coverage issues (0.1) .	0.60	\$630.00
12/16/25	Christine Saunders Haskett	Telephone and email with client re insurance coverage strategy issues.	1.10	\$1,155.00
12/16/25	David Goodwin	Emails regarding settlement issues.	0.20	\$210.00
12/17/25	David Goodwin	Emails regarding issues for status conference.	0.10	\$105.00
12/17/25	Julia C. Philips Roth	Legal research re plan implementation and consummation	0.60	\$630.00
12/18/25	Christine Saunders Haskett	Telephone and email with client and team re results of status conference and insurance strategy in light of same.	1.20	\$1,260.00
12/18/25	David Goodwin	Emails regarding settlement issues.	0.10	\$105.00
12/19/25	Christine Saunders Haskett	Prepare for discussion with claimants' counsel and review and respond to emails re same.	1.20	\$1,260.00
12/19/25	David Goodwin	Emails regarding settlement issues.	0.10	\$105.00
12/20/25	Christine Saunders Haskett	Telephone and email in preparation for discussion with claimants' counsel.	0.40	\$420.00
12/21/25	Christine Saunders Haskett	Prepare for discussion with claimants' counsel and telephone re same.	1.00	\$1,050.00
12/21/25	David Goodwin	Prepare for call with Committee.	0.40	\$420.00
12/22/25	Christine Saunders Haskett	Legal research and analysis re insurance settlement issues.	1.40	\$1,470.00
12/22/25	David Goodwin	Prepare for call with Committee (0.2); attend conference call with Committee (0.7).	0.90	\$945.00
12/23/25	Christine Saunders Haskett	Legal research and analysis re claimants' questions re insurance proposal.	1.40	\$1,470.00
12/24/25	Christine Saunders	Review and respond to emails re analysis of claimants' questions re insurance proposal.	0.80	\$840.00

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
	Haskett			
12/24/25	David Goodwin	Follow on from issues raised by the Committee concerning coverage.	0.30	\$315.00
12/26/25	Christine Saunders Haskett	Legal research in connection with insurers' questions re proposal (0.7); review and respond to emails re same (0.5).	1.20	\$1,260.00
12/26/25	David Goodwin	Emails regarding mediation issues.	0.10	\$105.00
12/29/25	Christine Saunders Haskett	Legal research in connection with insurers' questions re proposal and review and respond to emails re same.	1.20	\$1,260.00
12/29/25	David Goodwin	Emails regarding insurer communications (0.1); analyze insurance provisions in Committee counterproposal (0.7); comment on draft letter to Mr. Schiavone (0.1).	0.90	\$945.00
12/30/25	Christine Saunders Haskett	Review and respond to emails re insurance proposal and strategy.	0.70	\$735.00
12/30/25	Christine Saunders Haskett	Revise draft letter to insurer (0.3); review and respond to emails re same (0.1).	0.40	\$420.00
12/30/25	David Goodwin	Analyze insurance settlement issues.	0.40	\$420.00
Subtotal:	L120 - Analysis/Strategy		61.80	\$64,890.00
L160 - Settlement/Non-Binding ADR				
12/04/25	Christine Saunders Haskett	Prepare for and participate in telephone conference with mediator re settlement proposal and structure.	1.00	\$1,050.00
12/07/25	Christine Saunders Haskett	Telephone with client and email re settlement proposals.	0.40	\$420.00
12/08/25	Christine Saunders Haskett	Telephone and email with client re mediation strategy issues.	0.80	\$840.00
12/09/25	Abigail V. O'Brien	Call with client re settlement term sheet (.4); call with J. Philips Roth re same (.4); review and analyze term sheet (.8); call with J. Philips Roth re revisions to same (.5); call with client re term sheet (.6).	2.70	\$2,835.00
12/10/25	Abigail V. O'Brien	Numerous emails re term sheet.	1.20	\$1,260.00
12/11/25	Abigail V.	Email to client re proposed term sheet.	0.70	\$735.00

General Insurance Advice

048691.00001

Invoice No.: 61171789

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
	O'Brient			
12/16/25	Abigail V. O'Brient	Emails re settlement structure	0.20	\$210.00
12/22/25	Christine Saunders Haskett	Prepare for and participate in meeting with client, bankruptcy counsel, and claimants' counsel re insurance-related proposal.	1.70	\$1,785.00
12/29/25	Christine Saunders Haskett	Telephone and email with client and team re status of negotiations and correspondence with claimants and insurers.	1.40	\$1,470.00
Subtotal:	L160 - Settlement/Non-Binding ADR		10.10	\$10,605.00
L230 - Court Mandated Conferences				
12/17/25	Christine Saunders Haskett	Prepare for status conference.	0.40	\$420.00
12/18/25	Christine Saunders Haskett	Prepare for and attend status conference.	1.30	\$1,365.00
Subtotal:	L230 - Court Mandated Conferences		1.70	\$1,785.00
Total			73.60	\$77,280.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Dunn, Joseph R.	Partner	0.80	1,050.00	\$ 840.00
Haskett, Christine Saunders	Partner	46.60	1,050.00	\$ 48,930.00
O'Brient, Abigail V.	Partner	5.80	1,050.00	\$ 6,090.00
Goodwin, David	Senior Counsel	12.80	1,050.00	\$ 13,440.00
Johnson, Aja I.	Associate	3.50	1,050.00	\$ 3,675.00
Philips Roth, Julia C.	Associate	4.10	1,050.00	\$ 4,305.00
Totals		73.60		\$ 77,280.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Amount</u>
L120	Analysis/Strategy	\$64,890.00
L160	Settlement/Non-Binding ADR	\$10,605.00
L230	Court Mandated Conferences	\$1,785.00

Disbursement Summary

<u>Description</u>	<u>Amount</u>
Monthly Disk Storage	\$ 19.90
Westlaw Research	\$ 127.35
Computer Research	\$ 54.10
Parking	\$ 32.00
Telephone Calls	\$ 10.00
Totals	\$ 243.35

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
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Roman Catholic Bishop of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

January 29, 2026

Invoice No.: 61169621
Account: 048691.00002

Roman Catholic Bishop of Oakland

Re: Fee and Employment Applications

For professional services rendered in connection with the above referenced matter through
December 31, 2025:

Fees:	\$ 840.00
Disbursements:	
Computer Research	\$ 2.80
Disbursements	\$ 2.80
Total Fees and Disbursements:	\$ 842.80
 TOTAL AMOUNT DUE:	 \$ 842.80

Time Detail

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L250 - Other Written Motions & Submissions				
12/01/25	Julia C. Philips Roth	Revise and coordinate filing of October monthly fee statement	0.50	\$525.00
12/26/25	Julia C. Philips Roth	Revise and coordinate filing of second monthly fee statement	0.30	\$315.00
Subtotal:	L250 - Other Written Motions & Submissions		0.80	\$840.00
Total			0.80	\$840.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Philips Roth, Julia C.	Associate	0.80	1,050.00 \$	840.00
Totals		0.80	\$	840.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Amount</u>
L250	Other Written Motions & Submissions	\$840.00

Disbursement Summary

<u>Description</u>	<u>Amount</u>
Computer Research	\$ 2.80
Totals	\$ 2.80