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*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 WJL

Chapter 11

**THIRTY-THIRD MONTHLY FEE  
STATEMENT OF FOLEY & LARDNER LLP,  
AS GENERAL BANKRUPTCY COUNSEL TO  
THE DEBTOR, FOR ALLOWANCE AND  
PAYMENT OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE  
PERIOD OF FEBRUARY 1, 2026 THROUGH  
FEBRUARY 28, 2026**

Judge: Hon. William J. Lafferty

**Objection Deadline: April 9, 2026  
4:00 p.m. (Pacific Time)**

[No Hearing Requested]

<b>Name of Applicant:</b>	<b>Foley &amp; Lardner LLP</b>
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Effective as of May 8, 2023 by Order entered June 15, 2023 [Dkt. No. 145]
Period for Which Compensation and Reimbursement is Sought:	February 1, 2026 – February 28, 2026
Amount of Compensation Sought as Actual, Reasonable and Necessary: <sup>1</sup>	\$1,389,563.50
20% Holdback:	\$277,912.70
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: <sup>2</sup>	\$23,877.66
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought:	\$1,135,528.46

**PRELIMINARY STATEMENT**

On May 8, 2023 (the “Petition Date”), The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor” or “RCBO”)<sup>3</sup> commenced the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case” or the “Bankruptcy Case”). The Debtor continues to operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in this Chapter 11 Case.

On May 23, 2023, the Debtor filed the *Debtor’s Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§ 327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Dkt. No. 60] (the “Retention Application”). The Court approved the Retention Application on June 15, 2023, entering the *Order Approving Debtor’s*

<sup>1</sup> Foley & Lardner LLP has agreed not to bill the Debtor for the time it takes its attorneys to travel to or from the Bay Area and such amounts are not included in this Monthly Fee Statement.

<sup>2</sup> Foley & Lardner LLP has agreed not to bill the Debtor for the expenses for its attorneys to travel to or from the Bay Area, in connection with this Chapter 11 Case, and such amounts are not included in this Monthly Fee Statement.

<sup>3</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Orders (defined below).

1 *Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§*  
2 *327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Dkt.  
3 No. 145] (the “Foley Retention Order”).

4 Also on May 23, 2023, the Office of the United States Trustee filed its notice of appointment of  
5 an Official Committee of Unsecured Creditors [Dkt. No. 58].

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

15 Foley & Lardner LLP (“Foley” or “Applicant”), as general bankruptcy counsel to the Debtor,  
16 hereby submits its thirty-third monthly fee statement (the “Monthly Fee Statement”) for allowance of  
17 payment of compensation for professional services rendered and for reimbursement of actual and  
18 necessary expenses incurred for the period commencing February 1, 2026 through and including February  
19 28, 2026 (the “Fee Period”) pursuant to the Compensation Procedures Orders.

20 By this Monthly Fee Statement, Foley seeks (i) a monthly interim allowance of compensation in  
21 the amount of \$1,389,563.50 and actual and necessary expenses in the amount of \$23,877.66 for a total  
22 allowance of \$1,413,441.16 and (ii) payment of \$1,111,650.80 (80% of the allowed fees pursuant to the  
23 Compensation Procedures Orders) and reimbursement of \$23,877.66 (100% of the allowed expenses  
24 pursuant to the Compensation Procedures Orders) for a total payment of \$1,135,528.46 for the Fee Period.

25 **SERVICES RENDERED AND EXPENSES INCURRED DURING THE FEE PERIOD**

26 Attached as **Exhibit 1** is the name of each of Foley’s professionals and paraprofessionals who  
27 performed services for the Debtor in connection with this Chapter 11 Case during the Fee Period covered  
28

THIRTY-THIRD MONTHLY FEE STATEMENT OF FOLEY & LARDNER LLP

1 by this Monthly Fee Statement and the hourly rate and total fees for each professional during the Fee  
2 Period.

3 Attached as **Exhibit 2** is a summary of hours by category during the Fee Period.

4 Attached as **Exhibit 3** is a summary of expenses included in this Monthly Fee Statement incurred  
5 during the Fee Period.

6 Attached as **Exhibit 4** are the detailed time entries for Foley’s professionals and paraprofessionals  
7 during the Fee Period.

8 **NOTICE OF CUSTOMARY RATE INCREASES**

9 As disclosed in the *Debtor’s Application to Employ Foley & Lardner LLP as General Bankruptcy*  
10 *Counsel Pursuant to 11 U.S.C. §§ 327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal*  
11 *Rules of Bankruptcy Procedure* [Docket No. 60] (the “Foley Employment Application”), Foley’s hourly  
12 billing rates are subject to periodic review and adjustments. Foley’s practice of periodically adjusting its  
13 billing rates was disclosed to the Debtor in Foley’s engagement letter, and the Debtor has agreed to pay  
14 these modified rates pursuant to the engagement letter.

15 In accordance with ordinary practice and as described in the Foley Employment Application, Foley  
16 has changed certain of its billing rates effective as of February 1, 2026. Foley’s hourly billing rates  
17 effective as of February 1, 2026, for Foley’s professionals and paraprofessionals who performed services  
18 during the Fee Period, are as follows:

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Billing Category	U.S. Range
Associate	\$675-\$850
Of Counsel	\$925
Paralegal	\$420-\$480
Partner	\$1,000-\$1,575
Senior Counsel	\$875-\$950
Special Counsel	\$880

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1 **NOTICE AND OBJECTION PROCEDURES**

2 In accordance with the Compensation Procedures Orders, each Notice Party shall have until the  
3 tenth (10<sup>th</sup>) day (or the next business day if such day is not a business day) following service of this  
4 Monthly Fee Statement (the “Objection Deadline”) to serve an objection to the Monthly Fee Statement on  
5 Foley and each of the other Notice Parties.

6 Upon the expiration of the Objection Deadline, the Applicant shall file a certificate of no objection  
7 with the Court, after which the Debtor is authorized and directed to pay the Applicant an amount equal to  
8 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement.

9 If an objection is properly filed, the Debtor shall be authorized and directed to pay the Applicant  
10 80% of the fees and 100% of the expenses not subject to an objection.

11 DATED: March 30, 2026

12 **FOLEY & LARDNER LLP**

13 Eileen R. Ridley  
14 Shane J. Moses  
15 Ann Marie Uetz  
16 Matthew D. Lee  
17 Geoffrey S. Goodman  
18 Mark C. Moore

19 /s/ Shane J. Moses

20 SHANE J. MOSES

21 *Counsel for the Debtor*  
22 *and Debtor in Possession*

**EXHIBIT 1**  
**Compensation by Professional**  
**February 1, 2026 – February 28, 2026**

<b>Name of Professional Individual</b>	<b>Initials</b>	<b>Position of the Professional, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Jack R. Doti	JRDO	Associate, 2023	\$675	129.20	\$87,210.00
Mary Rofaeil	MRL	Associate, 2021	\$800	31.20	\$24,960.00
Mason Roberts	MR	Associate, 2018	\$850	70.60	\$60,010.00
Matthew Zavaro	MAZA	Associate, 2025	\$600	4.40	\$2,640.00
Michael W. Berg	MWBE	Associate, 2023	\$675	0.10	\$67.50
Nathan C. Walsh	NCW	Associate, 2024	\$650	2.90	\$1,885.00
Nora J. McGuffey	NMCG	Associate, 2020	\$825	18.20	\$15,015.00
Samantha Fakhimi	SAFA	Associate, 2025	\$600	24.70	\$14,820.00
Shane J. Moses	SJM	Of Counsel, 2005	\$925	84.80	\$78,440.00
Jack Dorr	JDOR	Other, N/A	\$300	0.50	\$150.00
Janelle C. Harrison	JCH	Paralegal, N/A	\$420	27.00	\$11,340.00
Kerry A Farrar	KAFA	Paralegal, N/A	\$480	129.50	\$62,160.00
Melissa J. Yusko	MJY	Paralegal, N/A	\$430	15.80	\$6,794.00
Wendy DeValle	WD	Paralegal, N/A	\$480	34.40	\$16,512.00
Alan R. Ouelette	AROU	Partner, 2010	\$1,000	120.70	\$120,700.00
Ann Marie Uetz	AMUE	Partner, 1993	\$1,225	134.20	\$164,395.00
David B. Goroff	DBG	Partner, 1985	\$1,450	46.70	\$67,715.00
Eileen R. Ridley	ERR	Partner, 1990	\$1,250	69.10	\$86,375.00
Emil P. Khatchaturian	EPK	Partner, 2009	\$1,000	5.20	\$5,200.00
Geoffrey S. Goodman	GSG	Partner, 1999	\$1,175	1.60	\$1,880.00
Jason J. Kohout	JJK	Partner, 2007	\$1,100	0.30	\$330.00
Jeffrey R. Blease	JRBL	Partner, 1988	\$1,575	76.70	\$120,802.50
Lisa F. Glahn	LFG	Partner, 2000	\$1,325	39.60	\$52,470.00
Mark C. Moore	MCM	Partner, 2010	\$1,050	77.00	\$80,850.00
Matthew D. Lee	MDL	Partner, 2006	\$1,000	63.90	\$63,900.00
Thomas F. Carlucci	TFCA	Partner, 1987	\$1,525	129.30	\$197,182.50
Tamar N. Dolcourt	TND	Special Counsel, 2009	\$880	52.00	\$45,760.00
<b>TOTAL</b>				<b>1,389.60</b>	<b>\$1,389,563.50</b>

**EXHIBIT 2**

**Compensation by Category  
February 1, 2026 – February 28, 2026**

<b>Category</b>	<b>Hours Billed this Fee Period</b>	<b>Total for Fee Statement</b>
003 – Automatic Stay	18.90	\$16,944.50
004 – Bankruptcy Litigation/Adversary Proceedings	0.40	\$168.00
005 - Bar Date Motion/ Claims Reconcil./ Claim Reconciliation Issues	18.30	\$15,394.00
006 – Case Administration (Docket Updates, WIP and calendar)	13.00	\$5,692.00
007 – Chapter 11 Plan / Plan Confirmation	103.30	\$102,664.50
008 – Communications with Client	58.50	\$69,240.00
009 – Corporate Governance and Board Issues	0.30	\$330.00
011 – Cash Management	4.80	\$5,580.00
012 – Disclosure Statement	20.40	\$20,576.50
016 – General Case Strategy (includes calls with client and team calls)	58.30	\$59,090.00
017 – Hearings and Court Matters	69.40	\$75,538.50
018 – Non-Bankruptcy Litigation	9.00	\$11,100.50
020 – Retention/Billing/Fee Applications for Debtor Professionals	45.10	\$39,515.00
022 – Retention/ Fee Applications: Other Professionals	9.80	\$8,272.00
025- U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Reports	3.90	\$3,610.00
026 – Unsecured Creditors Issues/Communications/Meetings	15.50	\$18,387.50
027 – Real Estate and Real Property Issues	4.80	\$4,730.00
031 – Insurance Issues (coverage, includes adversary proceeding)	37.10	\$38,801.50
032 – Rule 2004 Motions/Discovery/Subpoenas	2.30	\$1,838.50
034 – Other Motion Practice	14.40	\$12,625.00
037 – Financing	22.90	\$20,532.50
038 – Mediation	6.20	\$5,200.00
039 – JCCP 5108 Litigation (Case No. HG19048685) – Claim No. 63	834.00	\$829,374.50
040 – JCCP 5108 Litigation (Case No. 22CV020490) – Claim No. 182	11.40	\$14,530.50
043 – JCCP 5108 Litigation (Case No. 22CV023118) – Claim No. 52	6.80	\$9,444.00
044 – JCCP 5108 Litigation (Case No. 22CV02733) – Claim No. 47	0.80	\$384.00
<b>TOTAL</b>	<b>1,389.60</b>	<b>\$1,389,563.50</b>

**EXHIBIT 3**

**Expense by Category  
February 1, 2026 – February 28, 2026**

<b>Costs/Expense</b>	<b>Amount Billed</b>
Depositions / Transcripts, Exams	\$5,650.34
Electronic Legal Research Services	\$1,495.18
LSS – eDiscovery Services	\$12,400.00
Other Expenses	\$90.00
Other Fees	\$697.00
Recording / Filing Fees	\$1,398.80
Shipping Charges	\$141.94
Transportation / Travel Expenses	\$2,004.40
<b>TOTAL</b>	<b>\$23,877.66</b>

**EXHIBIT 4**

**Time Detail Entries  
February 1, 2026 – February 28, 2026**

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Roman Catholic Bishop of Oakland  
Attn: Attila Bardos  
Chief Financial Officer  
Diocese of Oakland  
2121 Harrison St., Ste. 100  
Oakland, CA 94612

Date: March 30, 2026  
Invoice No.: 51268033  
Our Ref. No.: 100845-0402

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Services through February 28, 2026

Amount due for professional services rendered regarding Chapter 11 Bankruptcy \$1,389,563.50

Total Expenses: \$23,877.66

**Amount Due:** \$1,413,441.16

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Please note that as of February 1, 2026, there may be certain matters on which hourly legal fees have been adjusted. This may or may not affect you. Please contact your principal attorney at the Firm if you have questions.

Please reference your invoice number 51268033 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of our invoice.

Federal Employer Number:  
39-0473800

**Professional Services Detail**

**003 Automatic Stay**

02/03/26	MDL	Strategize for response to motion to lift automatic stay filed by E. Macias.	0.50	\$500.00
02/04/26	MRL	Correspond with M. Moore regarding certain creditor's motion for relief from stay.	0.20	\$160.00
02/09/26	MDL	Analyze motion for relief from automatic stay filed by E. Macias.	0.40	\$400.00
02/09/26	MDL	Strategize regarding response to motion for relief from automatic stay filed by E. Macias.	0.90	\$900.00
02/09/26	SJM	Call with M. Lee regarding approach to Macias motion for relief from stay (.2); call with L. Katz (counsel for movant) regarding Macias motion (.3); further call with M. Lee regarding same (.4); prepare stipulation to continue hearing (.7); supervise research needed for opposition (.3).	1.90	\$1,757.50
02/10/26	NMCG	Analyze case law regarding opposition to lift stay motion (2.5); summarize research regarding the same for S. Moses (.6).	3.10	\$2,557.50
02/10/26	SJM	Brief review of research in support of opposition to motion for relief from stay (.3); email to T. Dolcourt regarding same (.3).	0.60	\$555.00
02/10/26	TND	Discussion with M. Lee and S. Moses regarding Macias stay motion objection (.3); begin review of research and documents to prepare response (.2).	0.50	\$440.00
02/11/26	TND	Review research on lifting the stay under Ninth Circuit law (.8); begin drafting opposition to Macias lift stay motion (1.2).	2.00	\$1,760.00
02/12/26	MDL	Revise opposition to E. Macias lift stay motion.	1.40	\$1,400.00
02/12/26	MDL	Email correspondence to A. Bardos regarding opposition to E. Macias lift stay motion and supporting declaration.	0.20	\$200.00
02/12/26	TND	Further drafting of Macias lift stay response (3.1); draft A. Bardos' declaration in support of same (.3).	3.40	\$2,992.00
02/13/26	SJM	Finalize opposition to motion for relief from stay.	1.40	\$1,295.00

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02/15/26	MCM	Review reply from Macias in support of motion for relief from stay.	0.30	\$315.00
02/15/26	MDL	Evaluate E. Macias reply in support of lift stay motion and possible rebuttals to her arguments to make at hearing.	0.30	\$300.00
02/17/26	SJM	Email to client regarding Macias motion for relief from stay (.5); prepare for hearing on same (.8).	1.30	\$1,202.50
02/26/26	JCH	Prepare zip file of Committee's renewed stay motion, declaration in support, order and transcript of hearing for team.	0.50	\$210.00

Task Total: 18.90 \$16,944.50

**004 Bankruptcy Litigation/Adversary Proceedings**

02/10/26	JCH	Calendar extended discovery deadlines in insurance coverage action pursuant to entry of order approving stipulation.	0.40	\$168.00
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Task Total: 0.40 \$168.00

**005 Bar Date Motion/ Claims Reconcil./ Claim Reconciliation Issues**

02/23/26	MCM	Work on claims funnel and related analysis in advance of anticipated omnibus claim objections to facially deficient claims, including update to master claims review (1.6); call with N. McGuffey regarding same (.8).	2.40	\$2,520.00
02/23/26	MDL	Evaluate categories of claims objections to file as omnibus motions.	0.40	\$400.00
02/23/26	NMCG	Discuss claim objection and procedures with M. Moore.	0.60	\$495.00
02/24/26	KAFA	Organize new late-filed proofs of claim and coordinate loading into RelOne.	0.30	\$144.00
02/24/26	MCM	Continue working on claims funnel and related analysis as basis for potential omnibus claim objections, including update to master claims review.	2.40	\$2,520.00

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02/24/26	MDL	Strategize with M. Moore and N. McGuffey regarding claims objections and options for procedures to govern claims objections.	0.40	\$400.00
02/24/26	NMCG	Research claim objection and procedures precedent (.8); call with M. Moore and M. Lee regarding the same (.5); begin drafting of claim objections (.5).	1.80	\$1,485.00
02/25/26	JCH	Prepare draft motion to approve claims objection and claims settlement procedures and proposed order with attachments.	2.50	\$1,050.00
02/25/26	MCM	Continue working on potential structure for claim-objection process and related issues (1.7); conference call with M. Lee regarding same and additional objections (.7).	2.40	\$2,520.00
02/25/26	MDL	Strategize regarding potential omnibus claims objections.	0.80	\$800.00
02/25/26	NMCG	Work on claim objections.	0.30	\$247.50
02/26/26	JCH	Prepare draft omnibus objection to duplicate claims and omnibus objection to late-filed claims and proposed orders.	2.00	\$840.00
02/26/26	MCM	Revise prior analysis of existing claims and prepare for potential omnibus or other objections as part of confirmation process.	1.20	\$1,260.00
02/26/26	MDL	Strategize with A. Uetz regarding omnibus claims objections.	0.30	\$300.00
02/27/26	NMCG	Continue drafting omnibus claim objections.	0.50	\$412.50
		Task Total:	18.30	\$15,394.00

**006 Case Administration (docket updates, WIP, and calendar)**

02/02/26	JCH	Update Timeline and Master Case Calendar (.5); update daily docket report (.5).	1.00	\$420.00
02/03/26	EPK	Review RCBO's status statement in advance of the February 4, 2026 hearing.	0.10	\$100.00
02/03/26	JCH	Update daily docket report.	0.50	\$210.00
02/04/26	JCH	File Casey declaration in support of renewed sale motion (.2); update daily docket report (.5).	0.70	\$294.00

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02/05/26	JCH	Calendar status conference and related filing deadline (.2); update daily docket report (.5).	0.70	\$294.00
02/06/26	JCH	File stipulation to extend time for professionals to file interim fee applications (.2); update daily docket report (.5).	0.70	\$294.00
02/09/26	JCH	File stipulation to continue hearing (.2); prepare and file notice of service list as of February 9, 2026 (.2); update daily docket report (.5).	0.90	\$378.00
02/10/26	JCH	Update daily docket report.	0.50	\$210.00
02/11/26	JCH	Update daily docket report.	0.50	\$210.00
02/12/26	JCH	Update daily docket report.	0.50	\$210.00
02/13/26	JCH	Update daily docket report.	0.50	\$210.00
02/16/26	EPK	Review status statement in advance of February 17 hearing.	0.10	\$100.00
02/16/26	JCH	Update daily docket report.	0.50	\$210.00
02/17/26	JCH	Update daily docket report.	0.20	\$84.00
02/18/26	JCH	Update Master Case Calendar and Timeline (.5); calendar continued status conference regarding plan and related filing deadlines (.4); update daily docket report (.5).	1.40	\$588.00
02/19/26	EPK	Review updated master case calendar and key dates timeline.	0.20	\$200.00
02/19/26	JCH	Update daily docket report.	0.50	\$210.00
02/20/26	JCH	Update daily docket report.	0.50	\$210.00
02/23/26	JCH	Update daily docket report.	0.50	\$210.00
02/24/26	JCH	Update daily docket report.	0.50	\$210.00
02/25/26	JCH	Update Master Case Calendar and Timeline and email same to M. Rofaeil (.5); update daily docket report (.5).	1.00	\$420.00
02/26/26	JCH	Update daily docket report.	0.50	\$210.00
02/27/26	JCH	Update daily docket report.	0.50	\$210.00
		Task Total:	13.00	\$5,692.00

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**007 Chapter 11 Plan/ Plan Confirmation**

02/01/26	MCM	Revise status update to Court in advance of hearing scheduled for February 4, 2026.	1.20	\$1,260.00
02/03/26	MCM	Attention to discovery matters concerning potential contested confirmation.	0.60	\$630.00
02/04/26	MRL	Confer with M. Moore regarding reviewing the Friars bankruptcy case (.3); analyze the Friars bankruptcy case regarding the competing plans issue (.2).	0.50	\$400.00
02/05/26	MCM	Analysis of other diocesan and religious-order plan outcomes, including settlement and/or potential settlements in Friars and Camden cases.	0.80	\$840.00
02/05/26	MRL	Continue analyzing the Friars bankruptcy case regarding the competing plans issue (.9); draft an email to M. Moore regarding the research (.3).	1.20	\$960.00
02/10/26	MCM	Email correspondence with Foley team regarding status of plan documents (.3); meeting with Foley team regarding same and next steps in drafting (.9); analysis of issues regarding insurance assignment in fourth amended plan (.5).	1.70	\$1,785.00
02/10/26	MDL	Evaluate terms of fourth amended plan and disclosure statement executive summary with Foley team.	1.40	\$1,400.00
02/10/26	SJM	Analyze approach to insurance assignment for fourth amended plan (1.2); email to M. Lee and M. Moore regarding same (.5).	1.70	\$1,572.50
02/10/26	SJM	Review issues to be addressed in revision to plan in preparation for meeting (.6); meet with M. Lee and M. Moore regarding issues to be addressed in revising fourth amended plan and disclosure statement (1.3).	1.90	\$1,757.50
02/11/26	MCM	Analysis of revisions to liquidation analysis and other expert reports prior to potential contested confirmation hearings (.4); email correspondence with A&M regarding same (.1).	0.50	\$525.00

**ROMAN CATHOLIC BISHOP OF OAKLAND**

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Invoice No.: 51268033

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02/11/26	MCM	Further revisions to executive summary document and related other filings in connection with fourth amended plan (1.5); email correspondence with Foley team regarding same (.3); analysis of research needs prior to status conference on 2/17 (.5).	2.30	\$2,415.00
02/11/26	NMCG	Revise executive summary of fourth amended plan (1.5); discuss the same with M. Moore (.2).	1.70	\$1,402.50
02/11/26	SJM	Work on revisions to fourth amended plan.	7.30	\$6,752.50
02/12/26	MCM	Meeting with S. Moses and M. Lee regarding plan documents and status (1.0); continue working on plan documents in connection with same (1.0); follow up on research in connection with confirmation and hearing on 2/17 (.5); analysis of meeting with Committee counsel and insurance counsel (.4); review of latest child-protection protocols for inclusion with filed fourth amended plan, when filed (.4).	3.30	\$3,465.00
02/12/26	MRL	Correspond with M. Moore regarding status of the plan confirmation discussion.	0.30	\$240.00
02/12/26	SJM	Meet with M. Lee and M. Moore regarding finalizing terms of fourth amended plan (1.0); follow up on items from same (1.0).	2.00	\$1,850.00
02/12/26	SJM	Continue to work on draft fourth amended plan.	5.90	\$5,457.50
02/12/26	TND	Email to J. Hogan on unknown claims representative matter.	0.10	\$88.00
02/13/26	MCM	Attention to issues regarding successor unknown claims representative following untimely passing of prior representative (.4); email correspondence and analysis of plan process issues with M. Lee and S. Moses (.4).	0.80	\$840.00
02/13/26	NMCG	Analyze privileged issues related to plan confirmation.	1.00	\$825.00
02/13/26	SJM	Further revisions to draft plan of reorganization.	1.60	\$1,480.00
02/13/26	TND	Call with J. Hogan on unknown claims representative status and continuation of same (.2); email to M. Lee, M. Moore, and S. Moses regarding same (.1).	0.30	\$264.00

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02/15/26	MCM	Analysis of draft fourth amended plan.	0.80	\$840.00
02/15/26	NMCG	Analyze privileged issues related to plan confirmation.	1.10	\$907.50
02/16/26	MDL	Revise draft of fourth amended plan of reorganization.	3.80	\$3,800.00
02/16/26	NMCG	Analyze privileged issues related to plan confirmation.	5.60	\$4,620.00
02/17/26	NMCG	Analyze privileged issues related to plan confirmation.	0.30	\$247.50
02/18/26	AMUE	Work on matters related to fourth amended plan to provide draft to client for review.	3.60	\$4,410.00
02/18/26	AMUE	Review real estate information related to plan.	1.20	\$1,470.00
02/18/26	EPK	Review amended plan filing process and timeline.	0.10	\$100.00
02/18/26	MCM	Further preparation of fourth amended plan and disclosure statement, as well as proposed timeline for confirmation process after hearing on March 10 (3.5); continue working on executive summary to account for proposed DIP borrowing discussed at hearing (1.2).	4.70	\$4,935.00
02/18/26	MDL	Continue revising fourth amended plan of reorganization.	0.80	\$800.00
02/18/26	NMCG	Analyze privileged issues related to plan confirmation.	1.50	\$1,237.50
02/19/26	AMUE	Continued work on fourth amended plan and communications with Foley team members regarding same.	3.40	\$4,165.00
02/19/26	AMUE	Communications with R. Manns regarding fourth amended plan.	0.40	\$490.00
02/19/26	MDL	Continue to revise fourth amended plan of reorganization.	0.80	\$800.00
02/19/26	SJM	Further revisions to fourth amended plan.	2.40	\$2,220.00
02/19/26	SJM	Review plan summary (.3); email to M. Lee and M. Moore regarding further revisions needed (.3).	0.60	\$555.00
02/20/26	AMUE	Review proposed filing related to fourth amended plan for discussion with client leadership/Foley team.	2.00	\$2,450.00

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02/20/26	MCM	Conference call with M. Lee and S. Moses regarding page turn of anticipated filing documents with fourth amended plan (1.5); review email correspondence with client parties regarding plan terms and related issues (.2); revise final draft of executive summary and confirm exhibits to be attached (.4).	2.10	\$2,205.00
02/20/26	MDL	Telephone conference with L. Macksoud (Dentons) regarding terms of fourth amended plan.	0.30	\$300.00
02/20/26	MDL	Email correspondence with insurers' counsel regarding fourth amended plan and changes from third amended plan.	0.20	\$200.00
02/20/26	MDL	Revise fourth amended plan of reorganization.	3.80	\$3,800.00
02/20/26	SJM	Further revisions to plan following Foley team meeting.	2.50	\$2,312.50
02/20/26	SJM	Revise plan summary for filing (1.2); prepare notice of filing (.7); finalize child-protection protocols for filing with plan summary (.6); finalize plan for filing (.3).	2.80	\$2,590.00
02/20/26	SJM	Review comments to plan from M. Kemner (.4); respond to same (.3); revise plan based on comments from M. Lee and M. Kemner (.8); confer with M. Lee and M. Moore regarding terms of fourth amended plan and summary of plan (1.5).	3.00	\$2,775.00
02/20/26	SJM	Work on corrections to terms related to Livermore property and correct identification of property in plan.	0.80	\$740.00
02/20/26	SJM	Meet with A. Uetz, A. Bardos, D. Flanagan, and C. de Quesada regarding finalizing cash contributions to plan.	0.70	\$647.50
02/21/26	MCM	Email correspondence with various parties regarding fourth amended plan and related issues.	0.50	\$525.00
02/22/26	MDL	Email exchange with counsel for Chubb companies regarding amendments to plan of reorganization.	0.20	\$200.00

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02/23/26	DBG	Strategize with A. Uetz regarding assisting with plan confirmation and preparatory tasks and follow up regarding same.	0.70	\$1,015.00
02/23/26	MRL	Correspond with M. Moore regarding preparations for the hearing.	0.20	\$160.00
02/23/26	SJM	Revise comparison chart of RCBO plan proposal versus other diocesan plans and settlements.	0.70	\$647.50
02/24/26	MRL	Email correspondence with NERA regarding supplementing the expert report.	0.40	\$320.00
02/24/26	NMCG	Analyze privileged issues regarding plan confirmation.	0.50	\$412.50
02/25/26	AMUE	Analyze tasks for plan confirmation to inform advice regarding certain privileged matters related to same.	1.50	\$1,837.50
02/25/26	DBG	Provide analysis of strategy regarding restricted assets AP and review M. Lee, G. Goodman correspondence regarding same.	1.40	\$2,030.00
02/25/26	MCM	Email correspondence with the potential successor unknown abuse-claims representative.	0.50	\$525.00
02/25/26	MCM	Conference call with expert witnesses regarding case status and fourth amended plan (.7); conference call with counsel for RCC regarding plan escrow (.5).	1.20	\$1,260.00
02/25/26	MDL	Telephone conference with D. Martin regarding updates to expert report to account for fourth amended plan and newly confirmed plans in other diocesan bankruptcies.	0.50	\$500.00
02/25/26	MDL	Telephone conference with Foley team and R. Manns (Norton Rose Fulbright) regarding RCWC escrow and additional plan-related terms.	0.40	\$400.00
02/25/26	MDL	Email exchange with R. Manns (Norton Rose Fulbright) regarding RCWC escrow agreement and identification of agent.	0.20	\$200.00
02/25/26	MR	Analyze plan-related documents to support expert witness work.	2.10	\$1,785.00

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02/25/26	MRL	Call with the Foley and NERA teams regarding supplementing the expert report (.6); analyze recent diocese settlements to provide an update to NERA (.9).	1.50	\$1,200.00
02/25/26	NMCG	Analyze privileged issues regarding plan confirmation.	0.20	\$165.00
02/26/26	MCM	Email correspondence regarding revised trust distribution protocol and related documents (.3); analysis of necessary revisions in light of changes in fourth amended plan, including preliminary distribution (.7).	1.00	\$1,050.00
02/26/26	MR	Continue analyzing plan-related documents to support expert witness work.	0.60	\$510.00
02/27/26	DBG	Reviewing plan documents (.4); team call regarding adversary proceeding and follow up regarding same (.7) .	1.10	\$1,595.00
02/27/26	MDL	Evaluate necessary changes to trust distribution plan agreement.	0.50	\$500.00
Task Total:			103.30	\$102,664.50

**008 Communications with Client**

02/01/26	AMUE	Finalize letter for leadership regarding privileged matter concerning settlement.	0.50	\$612.50
02/02/26	AMUE	Meeting with VeraCruz regarding privileged cash issue (1.3); debrief regarding same (.5).	1.80	\$2,205.00
02/02/26	AMUE	Email communications with M. Kemner regarding privileged matter.	0.40	\$490.00
02/03/26	AMUE	Meeting with P. Bongiovanni regarding privileged issue concerning settlement (.9); meeting with A. Bardos regarding privileged issue concerning settlement (.8); draft communication with M. Kemner regarding privileged settlement issue (1.0).	2.70	\$3,307.50

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02/03/26	AMUE	Multiple communications with client leadership about and analyze cash forecast (.8); communications with M. Kemner regarding status conference (.8); review comments provided by M. Kemner regarding status conference statement (.4).	2.00	\$2,450.00
02/03/26	SJM	Email to client regarding 2/4 hearing.	0.30	\$277.50
02/04/26	AMUE	Communications with P. Bongiovanni regarding privileged matter concerning settlement (.6); analyze privileged document concerning cash forecast and settlement (.8); successive communications with client leadership regarding privileged settlement matter (1.2).	2.60	\$3,185.00
02/05/26	AMUE	Successive meetings with Foley team and client leadership regarding privileged issues relating to global settlement matters.	6.00	\$7,350.00
02/05/26	MDL	Meet with M. Kemner and A. Bardos regarding case strategy in light of denial of motion to amend interim compensation order (only participated for part of meeting).	0.50	\$500.00
02/05/26	MDL	Meet with VeraCruz, A. Bardos, and M. Kemner regarding plan funding issues and negotiations with Committee.	1.00	\$1,000.00
02/05/26	SJM	Participate in debrief call with client regarding results of February 4 hearing.	1.00	\$925.00
02/06/26	MCM	Review email correspondence with client parties regarding internal discussions on fourth amended plan funding.	0.50	\$525.00
02/07/26	AMUE	Draft memorandum to client regarding privileged settlement issue regarding Committee (1.6); communications with M. Lee regarding same (.5); revisions to memorandum (.8).	2.90	\$3,552.50
02/07/26	MDL	Draft communication to client leadership regarding plan payment terms and Canon Law real estate sales approvals.	0.90	\$900.00
02/08/26	AMUE	Finalize memorandum for client leadership regarding privileged settlement issue (1.3); analyze cash forecast and timing for payment (1.1).	2.40	\$2,940.00

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02/09/26	AMUE	Multiple communications with client leadership and finance team regarding privileged settlement negotiations.	1.50	\$1,837.50
02/09/26	MCM	Email and telephone communications with client parties regarding claim issues.	0.50	\$525.00
02/10/26	AMUE	Communications with client leadership regarding privileged issue concerning RCC exit financing.	0.50	\$612.50
02/10/26	AMUE	Multiple successive communications with client leadership regarding privileged issues relating to settlement negotiations.	2.20	\$2,695.00
02/10/26	MCM	Email correspondence with R. Medeiros regarding information requests (.3); pull information and provide (.5); additional email correspondence with Foley team and client parties regarding case status (.5).	1.30	\$1,365.00
02/11/26	AMUE	Prepare for and meet with M. Kemner and Foley team regarding insurance issue.	1.00	\$1,225.00
02/11/26	AMUE	Communications with finance team regarding cash forecast.	0.50	\$612.50
02/11/26	MDL	Email exchange with M. Kemner regarding insurance settlement terms.	0.10	\$100.00
02/12/26	AMUE	Communication with client leadership regarding privileged settlement issue.	0.40	\$490.00
02/12/26	MCM	Correspondence with client regarding status of certain real-estate monetization and development efforts.	0.40	\$420.00
02/12/26	MDL	Email exchange with M. Kemner regarding stay on state court cases.	0.10	\$100.00
02/12/26	MDL	Email exchange with A. Bardos regarding negotiations with City of Livermore.	0.20	\$200.00
02/13/26	AMUE	Meeting with M. Kemner regarding privileged settlement matter (.5); draft privileged memorandum for client leadership regarding privileged settlement issue (1.5); confer with M. Lee regarding same (.4).	2.40	\$2,940.00
02/13/26	MDL	Email exchange with A. Bardos and RCBO's land use counsel regarding negotiations with City of Livermore.	0.20	\$200.00

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02/16/26	AMUE	Draft privileged memorandum for client leadership regarding potential paths available to Debtor.	4.00	\$4,900.00
02/16/26	MDL	Revise letter to Bishop Barber regarding options in light of Committee's refusal to negotiate.	0.70	\$700.00
02/16/26	MDL	Telephone conference with M. Kemner and A. Uetz regarding strategy for 2/17 status conference in light of Committee's refusal to negotiate.	0.30	\$300.00
02/17/26	AMUE	Finalize memorandum to Bishop Barber regarding privileged issue relating to settlement (1.2); meeting with Bishop Barber and client leadership regarding same (1.0).	2.20	\$2,695.00
02/17/26	MDL	Meet with Bishop Barber, M. Kemner, and A. Bardos in advance of hearing on status update and lift stay motion.	0.50	\$500.00
02/17/26	MDL	Meet with Bishop Barber, M. Kemner, and A. Bardos to discuss next steps and immediate strategy following hearing on status update and lift stay motion.	0.40	\$400.00
02/17/26	MR	Review email communication from A. Uetz to client regarding privileged strategy matters in chapter 11 proceedings.	0.20	\$170.00
02/18/26	AMUE	Communications with client regarding payment of professional fees.	0.40	\$490.00
02/18/26	AMUE	Review communication received from M. Kemner and outline response to same regarding privileged plan issue.	1.20	\$1,470.00
02/18/26	AMUE	Analyze two recent settlements (.5) and communication with client regarding same (.6).	1.10	\$1,347.50
02/18/26	AMUE	Communications with finance team regarding cash forecast.	0.60	\$735.00
02/18/26	MDL	Email exchange with M. Kemner regarding short-term case strategy.	0.40	\$400.00
02/19/26	AMUE	Communications with client leadership regarding fourth amended plan.	0.90	\$1,102.50
02/19/26	AMUE	Meeting with VeraCruz regarding fourth amended plan.	1.00	\$1,225.00

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02/19/26	MCM	Email correspondence with client parties regarding cadence of payments in fourth amended plan and financing consideration for same.	0.50	\$525.00
02/20/26	AMUE	Prepare for (.4) and meet with VeraCruz regarding cash forecast (.5); meeting with VeraCruz and A. Bardos to confirm schedule for settlement payments (1.1) and review of documents related to same (1.0); multiple communications with client leadership to confirm proceeding with fourth amended plan filing (1.1).	4.10	\$5,022.50
02/20/26	MDL	Email exchange with A. Bardos regarding plan funding provisions.	0.30	\$300.00
02/23/26	AMUE	Communications with M. Kemner regarding cash forecast.	0.40	\$490.00
02/23/26	MCM	Email correspondence with client parties regarding property analysis.	0.40	\$420.00
02/24/26	DBG	Conference with D. Flanagan, A. Bardos, M. Moore, and M. Lee regarding RCC loan collateral.	0.90	\$1,305.00
02/24/26	MDL	Telephone conference with A. Bardos and D. Flanagan regarding real estate to be used as collateral for exit facility and to be sold to fund Survivors' Trust payments.	0.90	\$900.00
02/25/26	MDL	Email exchange with M. Kemner regarding restricted assets adversary proceeding.	0.10	\$100.00
02/27/26	MDL	Email exchange with client leadership regarding motion to replace unknown abuse claims representative.	0.20	\$200.00
		Task Total:	58.50	\$69,240.00

**009 Corporate Governance and Board Issues**

02/14/26	JJK	Attention to filing Form 928 for Holy Names Educational Ministries.	0.10	\$110.00
02/16/26	JJK	Respond to question regarding converted entity.	0.20	\$220.00
		Task Total:	0.30	\$330.00

**011 Cash Management**

02/09/26	SJM	Prepare notice of payment of CCCEB operating expenses for January 2026.	0.60	\$555.00
02/12/26	AMUE	Analyze cash position.	0.60	\$735.00
02/23/26	AMUE	Communications with VeraCruz regarding cash forecast (.5); review updated cash forecast (.6).	1.10	\$1,347.50
02/24/26	AMUE	Analyze cash forecast (.5) and provide advice regarding certain assumptions (.8).	1.30	\$1,592.50
02/24/26	SJM	Review deadline to assume or reject CCCEB lease (.2); email to A. Uetz and M. Lee regarding preparation of updated motion on same (.2).	0.40	\$370.00
02/25/26	AMUE	Analyze cash forecast.	0.80	\$980.00
		Task Total:	4.80	\$5,580.00

**012 Disclosure Statement**

02/02/26	MCM	Review revisions to fourth amended disclosure statement to date in advance of potential filing (.5); work on necessary amendments for proposed fourth amended plan (1.0).	1.50	\$1,575.00
02/02/26	MRL	Correspond with M. Moore regarding revisions to the Debtor's disclosure statement (.2); analyze different versions of the Debtor's disclosure statement (.3).	0.50	\$400.00
02/03/26	MCM	Review proposed draft fourth amended disclosure statement in context of potential amendments or revisions to same based on latest term sheet.	0.60	\$630.00
02/04/26	MCM	Continue working on fourth amended disclosure statement and related plan documents.	0.70	\$735.00
02/06/26	MCM	Continue working on potential fourth amended disclosure statement and executive summary for same.	0.60	\$630.00
02/10/26	MCM	Convert draft fourth amended disclosure statement to executive summary and additional information, including frequently asked questions and discussion of strategic alternatives.	2.50	\$2,625.00

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02/10/26	TND	Email correspondence with Foley team on revisions to disclosure statement and executive summary (.3); call with Foley team regarding plan and disclosure statement amendment matters (partial attendance) (.5).	0.80	\$704.00
02/11/26	MDL	Analyze draft disclosure statement executive summary.	0.60	\$600.00
02/12/26	MDL	Revise disclosure statement executive summary.	1.50	\$1,500.00
02/13/26	MDL	Revise disclosure statement executive summary.	3.20	\$3,200.00
02/15/26	MDL	Continue to revise executive summary for disclosure statement.	1.60	\$1,600.00
02/17/26	SJM	Review updated liquidation analysis.	0.40	\$370.00
02/19/26	MCM	Finalization of executive summary and related information for the fourth amended plan in preparation for filing on February 20 (1.5); email correspondence and conference calls regarding same (.5); further revisions to update payment schedule (.6).	2.60	\$2,730.00
02/19/26	MDL	Continue to revise executive summary of fourth amended plan of reorganization.	0.70	\$700.00
02/19/26	MDL	Email exchange with A. Bardos regarding legal description of Livermore property.	0.20	\$200.00
02/19/26	SJM	Email to S. Levitt regarding underlying assumptions for liquidation analysis.	0.30	\$277.50
02/20/26	MDL	Revise executive summary of fourth amended plan of reorganization.	2.10	\$2,100.00
Task Total:			20.40	\$20,576.50

**016 General Case Strategy (includes team calls)**

02/01/26	MDL	Evaluate options for securing additional financing to accelerate plan payments.	0.40	\$400.00
02/02/26	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$800.00
02/02/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.80	\$640.00

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02/02/26	SJM	Strategize with T. Dolcourt regarding status conference statement research and fee applications.	0.40	\$370.00
02/02/26	SJM	Call with A. Uetz regarding status conference statement and approach to Wednesday hearing.	0.20	\$185.00
02/03/26	MCM	Analyze Committee filing regarding status conference and next steps in bankruptcy case (.4); email correspondence with Foley group regarding same (.2).	0.60	\$630.00
02/03/26	MDL	Strategize with A. Uetz regarding plan funding options and insurance-related settlement options.	0.90	\$900.00
02/03/26	SJM	Call with D. Flanagan to review cash forecast and assertions made by Committee.	0.60	\$555.00
02/05/26	MCM	Strategize with Foley team regarding hearing debrief for February 4 and strategy going forward (.8); additional email correspondence regarding plan issues (.4).	1.20	\$1,260.00
02/05/26	MDL	Evaluate options for settlement payments on different timelines.	1.00	\$1,000.00
02/06/26	MDL	Evaluate insurance settlement terms in Diocese of Buffalo bankruptcy case.	0.20	\$200.00
02/09/26	AMUE	Review Friars' term sheet to consider impact on settlement negotiations with Committee (1.2) and communications with Foley team regarding same (.5).	1.70	\$2,082.50
02/09/26	MDL	Strategize with A. Uetz regarding confidential mediation discussions and proposals.	0.90	\$900.00
02/09/26	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$800.00
02/09/26	TND	Review of Friars docket for information on term sheet.	0.30	\$264.00
02/10/26	AMUE	Review transcripts from status conference statements to assess Judge Lafferty's comments, and Committee's positions, regarding various issues impacting recommendation to client regarding strategy.	2.20	\$2,695.00
02/10/26	MDL	Strategize with A. Uetz regarding Committee settlement negotiations.	0.40	\$400.00

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02/10/26	MRL	Continue reviewing pending dioceses cases to provide an update on their status to client.	0.30	\$240.00
02/10/26	SJM	Respond to A. Uetz regarding potential scheduling for further status conference.	0.30	\$277.50
02/11/26	MCM	Email correspondence with Foley team regarding client recommendation and next steps.	0.50	\$525.00
02/12/26	MDL	Strategize with S. Moses and M. Moore regarding plan terms and disclosure statement executive summary language.	2.00	\$2,000.00
02/13/26	MCM	Analysis of notes from latest conversations with Committee regarding case status (.5); email correspondence with Foley team regarding same in context of overall case status (.5).	1.00	\$1,050.00
02/13/26	MDL	Strategize with A. Uetz and M. Moore regarding Committee rejection and refusal to counter payment timing proposal and next steps following same.	0.80	\$800.00
02/13/26	MDL	Strategize with S. Moses regarding forthcoming status conference.	0.30	\$300.00
02/15/26	AMUE	Prepare for meeting with client in relation to the status conference to consider available paths for the Debtor in light of current circumstances.	4.40	\$5,390.00
02/15/26	MRL	Review pending dioceses cases to provide an update on their status to client.	0.30	\$240.00
02/16/26	MRL	Continue reviewing pending dioceses cases to provide an update on their status to client.	1.40	\$1,120.00
02/16/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.50	\$400.00
02/16/26	TND	Research for A. Uetz on several privileged topics in advance of 2/17 status conference.	4.20	\$3,696.00
02/17/26	SJM	Meet with M. Lee, M. Moore, and A. Uetz in advance of status conference hearing.	1.20	\$1,110.00
02/18/26	EPK	Email correspondence with the Foley bankruptcy team regarding abuse claim settlements in other diocesan bankruptcy cases.	0.30	\$300.00
02/18/26	MCM	Analysis of issues concerning general case strategy (.5); email memorandum to client parties regarding same (.5).	1.00	\$1,050.00

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02/18/26	MRL	Correspondence with M. Moore regarding status of negotiations in the Camden diocese bankruptcy case.	0.20	\$160.00
02/18/26	MRL	Correspond with J. Harrison regarding the case calendar and timeline of the case.	0.20	\$160.00
02/19/26	MRL	Finalize summarizing daily docket activity and upcoming deadlines for client.	0.70	\$560.00
02/20/26	MRL	Correspond with M. Moore regarding the confirmation dates for certain diocese cases (.2); analyze the bankruptcy dockets regarding those certain diocese cases (.2).	0.40	\$320.00
02/21/26	MDL	Draft list of immediately necessary tasks in advance of March 10 hearing.	0.20	\$200.00
02/22/26	MCM	Review email correspondence regarding case status and to-do lists for Foley team (.4); email correspondence with M. Lee regarding same (.2).	0.60	\$630.00
02/22/26	MDL	Revise summary of immediate necessary tasks following filing of chapter 11 plan.	0.20	\$200.00
02/23/26	AMUE	Prepare for meeting with Foley team regarding privileged plan confirmation strategy issues and strategy by drafting privileged memorandum regarding same (1.3); participate in meeting (1.6).	2.90	\$3,552.50
02/23/26	DBG	Attend team meeting led by A. Uetz to discuss “to do list” and upcoming deadlines and tasks.	1.60	\$2,320.00
02/23/26	MCM	Conference call with Foley team regarding confirmation issues, next steps, and to-do list.	1.60	\$1,680.00
02/23/26	MDL	Strategize with Foley team regarding motions to be filed in advance of March 10 hearing, discovery strategy for plan confirmation, and claims objections.	1.60	\$1,600.00
02/23/26	MRL	Review pending dioceses cases to provide an update on their status to client.	0.90	\$720.00
02/23/26	SJM	Analyze next steps in connection with fourth amended plan (1.3); case team meeting regarding strategy and tasks for fourth amended plan (1.6).	2.90	\$2,682.50
02/24/26	AMUE	Meeting with M. Lee to strategize regarding plan tasks (.8); prepare for same (1.1).	1.90	\$2,327.50

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02/24/26	MDL	Strategize with Foley team regarding possible point of compromise with Committee.	0.70	\$700.00
02/24/26	MDL	Strategize with Foley team regarding immediate case needs.	0.60	\$600.00
02/25/26	AMUE	Meeting with R. Manns, M. Lee and M. Moore regarding RCWC contribution to plan.	0.50	\$612.50
02/25/26	MCM	Email correspondence with Foley bankruptcy team regarding next steps with respect to identification of certain individuals with roles under fourth amended plan.	0.60	\$630.00
02/25/26	MCM	Confer with M. Lee regarding restricted-assets adversary proceeding and related issues.	0.50	\$525.00
02/25/26	MDL	Strategize regarding possible continuance of restricted assets adversary proceeding.	0.70	\$700.00
02/25/26	MDL	Strategize regarding preparation of response to Committee's eventual draft plan of reorganization.	0.20	\$200.00
02/25/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.60	\$480.00
02/26/26	NCW	Research privileged matter concerning lift stay order.	2.90	\$1,885.00
02/27/26	AMUE	Analyze privileged issue relating to adversary proceeding with Foley team.	1.00	\$1,225.00
02/27/26	MCM	Conference call with Foley team regarding restricted assets adversary proceeding and potential strategy for addressing same (partial).	0.80	\$840.00
02/27/26	MDL	Strategize with Foley team regarding restricted assets adversary proceeding.	1.00	\$1,000.00
Task Total:			58.30	\$59,090.00

**017 Hearings and Court Matters**

02/01/26	AMUE	Draft status conference statement (2.4); communications with Foley team regarding same (.6).	3.00	\$3,675.00
02/01/26	SJM	Revise draft status conference statement for February 4.	1.40	\$1,295.00

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02/02/26	MCM	Review status conference statement for February 4, 2026.	0.40	\$420.00
02/02/26	MDL	Revise Debtor's case update statement to be filed in advance of February 4 status conference.	0.40	\$400.00
02/02/26	SJM	Revise status conference statement, including based on additional research regarding chapter 11 purpose.	1.30	\$1,202.50
02/02/26	TND	Research on cramdown issues for status report (1.9); review transcripts for further information for status report (1.4); confer with S. Moses regarding same (.3).	3.60	\$3,168.00
02/03/26	AMUE	Outline arguments for court hearing regarding status (1.3) and meeting with S. Moses to help him prepare for same (.5).	1.80	\$2,205.00
02/03/26	SJM	Analyze Committee status statement for 2/4 hearing (.3); email to team regarding same (.1).	0.40	\$370.00
02/04/26	AMUE	Strategize regarding statement for status conference and provide revisions to same (1.5); attend court status conference and hearing on motion to amend interim compensation order (2.2) and debrief from same with internal and client teams (1.2).	4.90	\$6,002.50
02/04/26	MCM	Prepare for and participate in hearing on modification of interim compensation procedures and sale of certain real property (partial).	1.20	\$1,260.00
02/04/26	SJM	Attend hearing on motions to amend interim compensation and for sale of real property (2.3); meet with client before hearing (.3); debrief call with A. Uetz following hearing (.2).	2.80	\$2,590.00
02/04/26	SJM	Prepare for hearing on motion to amend interim compensation.	2.30	\$2,127.50
02/05/26	MCM	Prepare for hearings on February 17 regarding case status and plan process.	0.50	\$525.00
02/11/26	AMUE	Prepare outline for status conference.	1.40	\$1,715.00
02/13/26	AMUE	Outline status conference report (1.0); review research relating to cramdown issues (1.1); meeting with N. McGuffey regarding same (.4).	2.50	\$3,062.50

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02/13/26	MCM	Prepare for hearing on February 17 on case status and plan process.	1.00	\$1,050.00
02/15/26	MCM	Prepare for hearings on February 17.	0.50	\$525.00
02/16/26	AMUE	Prepare for status conference hearing (5.0); successive meetings with Foley team to prepare for client meeting and status conference (2.0); meeting with M. Kemner and M. Lee to prepare for status conference (.8); respond to communication from J. Prol (.5).	8.30	\$10,167.50
02/16/26	JCH	Revise Debtor's status conference statement (.2); file Debtor's status conference statement (.2).	0.40	\$168.00
02/16/26	MCM	Prepare for hearing on case status, potential fourth amended plan, and related matters.	3.50	\$3,675.00
02/16/26	MDL	Strategize with Foley team regarding status conference and request for ruling on cram down.	1.20	\$1,200.00
02/16/26	MDL	Revise Debtor's status conference statement ahead of 2/17 status conference.	0.40	\$400.00
02/16/26	SJM	Finalize status conference statement for filing (.5); email to client regarding filed statement (.2).	0.70	\$647.50
02/17/26	AMUE	Prepare for (3.0) and appearance at (3.0) court status conference and motion hearing; debrief with team from hearing (1.0).	7.00	\$8,575.00
02/17/26	EPK	Listen to a portion of today's status hearing regarding settlement discussions and potential fourth amended plan filing.	0.60	\$600.00
02/17/26	ERR	Attend case management conference in bankruptcy case (partial).	1.50	\$1,875.00
02/17/26	MCM	Prepare for status conference on plan process and case status with Foley team (3.0); attend status conference, including discussion with Committee counsel about filing of Committee plan (3.0); debrief with client parties and Foley team following hearing (1.0).	7.00	\$7,350.00
02/17/26	MDL	Attend hearing on status update and lift stay motion (partial).	1.60	\$1,600.00
02/17/26	MDL	Draft outline for hearing on status update and lift stay motion.	1.10	\$1,100.00

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02/17/26	MDL	Strategize with Foley team regarding next steps and immediate strategy following hearing on status update and lift stay motion.	1.10	\$1,100.00
02/17/26	MDL	Strategize with Foley team for hearing on status update and lift stay motion.	2.10	\$2,100.00
02/17/26	SJM	Attend status conference hearing (partial) (1.3); meet with client before and after status conference (1.0).	2.30	\$2,127.50
02/24/26	MCM	Work on potential schedule for confirmation hearings to present at hearing on March 10, 2026.	0.70	\$735.00
02/26/26	MCM	Prepare for hearings on March 10, 2026 in RCBO bankruptcy matters.	0.50	\$525.00
		Task Total:	69.40	\$75,538.50

**018 Non-Bankruptcy Litigation**

02/02/26	ERR	Begin review of motion to stay to appellate court.	0.70	\$875.00
02/04/26	ERR	Edit appellate briefing regarding stay of bellwether cases.	2.40	\$3,000.00
02/09/26	EPK	Review Judge Chatterjee's CMC order on Oakland trial dates for the remaining four test cases.	0.10	\$100.00
02/09/26	KAFA	Prepare complaints and information on counsel for the 4 additional Diocese of Oakland bellwether cases going to trial.	0.30	\$144.00
02/10/26	KAFA	Research individual for T. Carlucci.	0.30	\$144.00
02/10/26	TFCA	Telephone call with J. Blease regarding setting trial dates for four bellwether cases.	0.50	\$762.50
02/12/26	TFCA	Emails with co-counsel Z. Rutman regarding trial setting (.2); respond to plaintiffs' trial counsel for setting trial for 4 cases (.3).	0.50	\$762.50
02/13/26	TFCA	Review emails regarding trial date responses (.3); emails with A. Ouellette regarding same (.2).	0.50	\$762.50
02/14/26	TFCA	Attention to emails regarding state court cases and insurance carrier representation.	0.50	\$762.50

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02/18/26	ERR	Meeting with Z. Rutman regarding strategy as to potential jury instructions on six cases subject to relief from stay.	1.00	\$1,250.00
02/25/26	EPK	Confer with A. Ouellette and M. Roberts regarding today's JCCP 5108 case management conference and takeaways from same.	0.20	\$200.00
02/27/26	AMUE	Analyze privileged issue relating to objections to claims (.8); analyze issue relating to state court litigation in light of lift stay order (.8).	1.60	\$1,960.00
02/27/26	EPK	Review February 26, 2026 CMC order issued by Judge Chatterjee.	0.10	\$100.00
02/28/26	SJM	Analyze motion for settlement of individual claimant actions in Archdiocese of San Francisco case (.2); email to case team regarding same (.1).	0.30	\$277.50
Task Total:			9.00	\$11,100.50

**020 Retention/Billing/Fee Applications for Debtor Professionals**

02/02/26	JCH	Finalize draft of Foley's eighth interim fee application.	2.00	\$840.00
02/02/26	TND	Email communications with A&M (.1), J. Breall (.1), Covington and Burling (.2), Hilco (.1), and NERA (.1) regarding next interim fee applications; review M. Kemner's invoice for January (.2).	0.80	\$704.00
02/03/26	MDL	Strategize for hearing on interim compensation motion.	0.50	\$500.00
02/03/26	TND	Work on information for Foley's interim fee application.	0.20	\$176.00
02/04/26	TND	Emails with I. Velikova (.1) and J. Breall (.1) regarding interim fee applications.	0.20	\$176.00
02/05/26	TND	Review additional information needed for fee application for Foley (.2); discuss stipulation for adjournment with S. Moses (.2); review draft stipulation (.1); email draft stipulation to G. Albert (.1).	0.60	\$528.00

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02/06/26	TND	Update stipulation to adjourn interim fee filing date (.1); email correspondence with D. Klauder regarding same (.1); email to J. Harrison regarding filing stipulation (.1).	0.30	\$264.00
02/10/26	AMUE	Review request for payment received from Committee counsel and provide advice for client regarding professional fees.	0.50	\$612.50
02/10/26	JCH	Prepare and file certificates of no objection to Foley and A&M December 2025 monthly fee statements.	0.50	\$210.00
02/10/26	SJM	Review certificates of non-opposition for December monthly statements (.2); email to C. Moore regarding same (.1).	0.30	\$277.50
02/10/26	TND	Strategize with S. Moses regarding fee applications (.1); email to J. Breall regarding hearing date and status (.1).	0.20	\$176.00
02/11/26	JCH	Calendar extended deadline to file interim fee applications.	0.10	\$42.00
02/12/26	TND	Email correspondence with Foley team regarding issues related to litigation expenses and reimbursement from insurers.	0.20	\$176.00
02/13/26	TND	Discuss reimbursement for fees for state court cases with A. Uetz (.1); review July through October bills for time attributable to state court cases (1.1).	1.20	\$1,056.00
02/17/26	TND	Further drafting of eighth interim fee application for Foley.	3.30	\$2,904.00
02/18/26	TND	Draft Foley's eighth interim fee application.	2.60	\$2,288.00
02/19/26	SJM	Draft case status and overview section of Foley interim fee application.	2.70	\$2,497.50
02/19/26	TND	Further drafting of eighth interim Foley fee application (3.9); revise NERA application and declaration (.6); email with I. Velikova regarding NERA application (.2).	4.70	\$4,136.00
02/20/26	MDL	Evaluate possible reductions in amount requested in next interim fee application.	0.10	\$100.00
02/20/26	SJM	Email correspondence with T. Dolcourt regarding issues related to filing of interim fee applications.	0.40	\$370.00

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02/20/26	TND	Further drafting of Foley eighth interim fee application (1.6); emails with Covington team regarding their application (.2).	1.80	\$1,584.00
02/23/26	AMUE	Draft revisions to quarterly fee application.	1.50	\$1,837.50
02/23/26	MDL	Revise interim fee application descriptions of Debtor's current cash position and fee estimate update.	0.20	\$200.00
02/23/26	SJM	Call with T. Dolcourt regarding finalizing interim fee applications and related issues.	0.40	\$370.00
02/23/26	TND	Revise eighth interim Foley fee application per comments from A. Uetz and M. Lee (2.2); communications with Foley team on eighth interim fee application (.9); email correspondence with N. Corbett regarding A&M fee application (.2); email with I. Velikova regarding NERA fee application (.2); begin work on January 2026 fee statement to ensure compliance with U.S. Trustee guidelines (2.7).	6.20	\$5,456.00
02/24/26	AMUE	Revisions to Foley interim fee application (1.5) and provide advice regarding payments to mediators (.4); approve declaration for fee application (.3).	2.20	\$2,695.00
02/24/26	JCH	Finalize and file interim fee applications of Foley, A&M, NERA, Judge Sontchi, T. Gallagher and Judge Newsome (1.2); file notice of hearing on interim fee applications (.5).	1.70	\$714.00
02/24/26	SJM	Assist with finalizing Foley interim fee application (.4); prepare omnibus notice of hearing on interim fee applications (1.4); direct Verita regarding service of fee applications (.3); email correspondence with Committee counsel to coordinate notice and service of fee applications (.4).	2.50	\$2,312.50

02/24/26	TND	Finalize eighth interim fee application for Foley (1.2); communications with Foley team regarding same (.4); finalize Uetz declaration (.2); finalize NERA interim application and declaration (.2); finalize A&M interim application and declaration (.2); emails with Foley team regarding billing practices for state court cases (.3); further preparation of January fee statement to ensure compliance with U.S. Trustee guidelines (1.6).	4.10	\$3,608.00
02/25/26	AMUE	Revisions to monthly fee statement.	1.20	\$1,470.00
02/26/26	SJM	Call with T. Dolcourt regarding transmission of fee applications to client and related issues.	0.50	\$462.50
02/27/26	JCH	Prepare draft of Foley's January 2026 monthly fee statement (.3); revise monthly fee statement to add amounts (.5); file monthly fee statement (.2).	1.00	\$420.00
02/27/26	TND	Finalize January fee statement.	0.40	\$352.00
		Task Total:	45.10	\$39,515.00

**022 Retention/Fee Applications: Other Professionals**

02/02/26	TND	Email correspondence with D. Klauder (.1), A. Fernandez (.1), and C. Syzmanski (.1) regarding next interim fee application filings.	0.30	\$264.00
02/03/26	SJM	Email to client regarding December monthly fee statements.	0.70	\$647.50
02/04/26	JCH	Revise Judge Newsome's interim fee application to conform with California filing guidelines.	0.50	\$210.00
02/04/26	TND	Revise fifth interim fee application for Judge Newsome.	0.50	\$440.00
02/05/26	JCH	Prepare draft stipulation and proposed order extending time to file interim fee applications.	0.50	\$210.00
02/09/26	TND	Email to Judge Newsome with revised fee application (.1); email to S. Moses regarding fee question (.1).	0.20	\$176.00
02/13/26	SJM	Email to client regarding payment of monthly fee statements.	0.60	\$555.00

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02/13/26	TND	Email to C. Syzmanski regarding hearing date for next interim fee application.	0.10	\$88.00
02/17/26	SJM	Respond to question from client regarding timing for payment on interim fee application balances.	0.30	\$277.50
02/17/26	TND	Email correspondence with A. Fernandez regarding interim fee application.	0.20	\$176.00
02/18/26	SJM	Follow up regarding status of interim fee payments.	0.80	\$740.00
02/18/26	TND	Review issues related to payment of professional fees and timing (.3); call with S. Moses regarding same and other case matters (.4); email and telephone call with A. Uetz regarding same (.2).	0.90	\$792.00
02/19/26	TND	Work on T. Gallagher's fee application (.8); review payments to Judge Newsome and T. Gallagher for fee applications (.3).	1.10	\$968.00
02/20/26	TND	Emails with C. Syzmanski regarding Judge Sontchi's interim fee application.	0.20	\$176.00
02/23/26	TND	Review payments to Judge Newsome and T. Gallagher (.6); update applications for each (.3); call with S. Moses (.4); emails with A. Uetz regarding same (.2).	1.50	\$1,320.00
02/24/26	TND	Finalize Judge Newsome's fee application (.2); email correspondence with Judge Newsome regarding same (.2); finalize T. Gallagher's fee application (.2); email with A. Fernandez regarding same (.2); discuss payment issue with A. Uetz (.1).	0.90	\$792.00
02/26/26	TND	Prepare required email to client team on interim fee applications pursuant to local rules (.4); discuss same with S. Moses (.1).	0.50	\$440.00
		Task Total:	9.80	\$8,272.00

**025 U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating**

02/04/26	EPK	Email correspondence with A. Bardos and D. Flanagan regarding the next Rule 2015.3 report for CTN.	0.20	\$200.00
02/10/26	EPK	Review Rule 2015.3 reporting package for CTN that is due to be filed on February 16, 2026 (.1); email correspondence with A. Bardos and D. Flanagan regarding third-party review of same (.1); email correspondence with counsel to interested parties regarding draft of CTN report (.1); coordinate with J. Harrison regarding filing of and special service list for the CTN Rule 2015.3 report (.2).	0.50	\$500.00
02/13/26	EPK	Finalize Rule 2015.3 reporting package for filing (.1); coordinate with J. Harrison regarding filing and service of same today (.1).	0.20	\$200.00
02/17/26	EPK	Email correspondence with D. Flanagan regarding status of draft January 2026 MOR package.	0.20	\$200.00
02/18/26	EPK	Email correspondence with D. Flanagan and A. Bardos regarding preliminary draft of the January 2026 MOR package (.2); review January 2026 MOR package (.3).	0.50	\$500.00
02/19/26	EPK	Comment on the January 2026 MOR package, including revisions to several explanatory footnotes (.7); email correspondence with D. Flanagan to provide feedback on and comments to the January 2026 MOR (.3); follow-on email correspondence with A. Bardos regarding final approval for filing and service of MOR (.1).	1.10	\$1,100.00
02/20/26	EPK	Brief call with D. Flanagan regarding finalization of January 2026 MOR (.1); review email from A. Bardos approving January 2026 MOR (.1); oversee filing and service of the January 2026 MOR (.2).	0.40	\$400.00
02/20/26	JCH	File January 2026 monthly operating report and circulate filed copy of same to client group.	0.50	\$210.00
02/24/26	EPK	Emails with D. Flanagan and A. Bardos regarding January MOR supplemental information to be produced to the BRG team.	0.20	\$200.00

02/25/26	EPK	Follow up on production of the BRG January 2026 MOR supplemental information.	0.10	\$100.00
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	Task Total:	3.90	\$3,610.00
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**026 Unsecured Creditor Issues/Communications/Meetings**

02/02/26	AMUE	Meeting with J. Prol regarding settlement matters.	0.50	\$612.50
02/02/26	AMUE	Prepare for (.4) and participate in (.8) call with Lowenstein and Burns Bair regarding settlement matters.	1.20	\$1,470.00
02/06/26	AMUE	Prepare for (.5) and meeting with J. Prol regarding settlement issues (.6).	1.10	\$1,347.50
02/09/26	AMUE	Prepare for (1.4) and meet with J. Prol regarding settlement discussions (1.0).	2.40	\$2,940.00
02/09/26	AMUE	Draft communication to J. Prol regarding settlement negotiations.	1.10	\$1,347.50
02/09/26	MDL	Revise letter to Committee counsel regarding confidential mediation proposal.	0.30	\$300.00
02/10/26	AMUE	Communications with J. Prol regarding settlement.	0.40	\$490.00
02/10/26	MDL	Email exchange with T. Burns (Burns Bair) regarding confidential mediation topic.	0.10	\$100.00
02/11/26	AMUE	Analyze Friars settlement.	0.70	\$857.50
02/11/26	AMUE	Prepare for and meet with Committee counsel regarding insurance issues.	1.00	\$1,225.00
02/12/26	AMUE	Continue to analyze settlement position while awaiting Committee response to last proposal.	1.40	\$1,715.00
02/13/26	AMUE	Meeting with J. Prol regarding settlement position (.5); draft summary regarding same (1.2).	1.70	\$2,082.50
02/15/26	MDL	Email exchange with Lowenstein and Burns Bair regarding Committee refusal to negotiate any open issues until timing of survivor payments is resolved.	0.40	\$400.00
02/23/26	MDL	Telephone conference with M. Kaplan regarding discovery in adversary proceeding.	0.20	\$200.00

02/24/26	MDL	Multiple communications with M. Kaplan (Lowenstein) regarding adversary proceeding schedule and confirmation schedule and related considerations.	0.80	\$800.00
02/25/26	GSG	Review option and analysis regarding restricted assets case and plan impact (.4); telephone conference with D. Goroff regarding same (.3); respond to team regarding same (.2).	0.90	\$1,057.50
02/26/26	MDL	Email exchange with M. Kaplan (Lowenstein) regarding informal discovery requests for confirmation and restricted assets issues.	0.20	\$200.00
02/27/26	GSG	Telephone conference with RCBO team regarding restricted assets issues.	0.70	\$822.50
02/27/26	MCM	Review email correspondence with Committee counsel regarding appointment of successor unknown abuse-claims representative.	0.40	\$420.00
Task Total:			15.50	\$18,387.50

**027 Real Estate and Real Property Issues**

02/01/26	SJM	Respond to buyer of 1822 house request to purchase through a trust.	0.40	\$370.00
02/02/26	SJM	Prepare 363(m) declaration in support of motion to sell property.	0.70	\$647.50
02/03/26	AMUE	Provide advice to team regarding motion on sale of real estate.	0.30	\$367.50
02/04/26	SJM	Call with agent for interested buyer regarding property (.2); call with P. Bongiovanni regarding same (.2).	0.40	\$370.00
02/04/26	SJM	Finalize buyer 363(m) declaration for motion to sell house (.2); finalize order granting motion (.4).	0.60	\$555.00
02/04/26	SJM	Respond to email from U.S. Trustee regarding motion for sale of property.	0.20	\$185.00
02/06/26	SJM	Email correspondence with real estate agent regarding order approving sale of house and additional information requested by escrow.	0.60	\$555.00

02/13/26	MCM	Analysis of client update and summary regarding development efforts with respect to Livermore property.	0.60	\$630.00
02/24/26	MCM	Call with real estate team regarding property to be used as collateral for exit and DIP financing and/or sold for plan funding purposes.	1.00	\$1,050.00
		Task Total:	4.80	\$4,730.00

**031 Insurance Issues (coverage, includes adversary proceeding)**

02/01/26	AMUE	Analyze privileged matter relating to insurance (.4); communications with Foley litigation team regarding same (.5).	0.90	\$1,102.50
02/02/26	AMUE	Analyze insurance settlement issues.	1.40	\$1,715.00
02/02/26	MR	Finalize supplemental document production to CIGA in insurance coverage action.	0.40	\$340.00
02/03/26	ERR	Review NY case against Chubb regarding issues raised similar to present action.	0.80	\$1,000.00
02/03/26	MR	Internal emails regarding privileged discovery strategy considerations in insurance coverage action (.2); assess adequacy of document productions from certain insurers, in advance of court-ordered deadline to submit joint discovery dispute letters (.6).	0.80	\$680.00
02/04/26	AMUE	Provide advice regarding discovery issue in coverage litigation.	0.50	\$612.50
02/04/26	MCM	Analyze developments in other cases involving insurers (.7); draft and transmit email summary to client parties (.8).	1.50	\$1,575.00
02/04/26	MR	Internal email communications regarding privileged strategy matter in insurance coverage action (.3); telephone and email communications with counsel for CNA regarding proposed stipulation to further extend discovery deadlines in insurance coverage action (.2).	0.50	\$425.00
02/05/26	ERR	Review status of production from insurers.	0.50	\$625.00
02/05/26	MDL	Evaluate discovery stipulations with insurers for potential impact on main bankruptcy case.	0.10	\$100.00

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02/05/26	MR	Internal email communications with E. Ridley, A. Uetz and M. Lee regarding privileged strategy matters in insurance coverage action.	0.30	\$255.00
02/05/26	MRL	Review email correspondence from the Foley team regarding insurance issues in other diocese cases.	0.30	\$240.00
02/06/26	AMUE	Analyze and provide advice to team regarding discovery issues in coverage case.	0.80	\$980.00
02/06/26	ERR	Review stipulation regarding pending discovery issues with insurers.	0.50	\$625.00
02/06/26	MR	Internal email communications regarding privileged discovery-related matters in insurance coverage action.	0.20	\$170.00
02/07/26	ERR	Review status of case and settlement and issues regarding discovery stipulation regarding insurer action.	0.60	\$750.00
02/08/26	ERR	Review case status regarding settlement and pending stipulations.	0.50	\$625.00
02/09/26	ERR	Review court order regarding stipulation as to productions with insurers.	0.40	\$500.00
02/09/26	MR	Communicate with counsel for CNA regarding stipulation for extension of discovery deadlines with all insurers in insurance coverage action (.1); review produced and withheld documents to determine need for and scope of supplemental privilege log in insurance coverage action (.6).	0.70	\$595.00
02/10/26	ERR	Review status of potential plan terms and issues regarding Friar's term in light of coverage issues.	0.80	\$1,000.00
02/11/26	AMUE	Review communication received from M. Kemner regarding privileged insurance issue (.4) and analyze same (.7).	1.10	\$1,347.50
02/11/26	ERR	Review issues regarding potential settlement plan as presented by Burns Bair.	0.70	\$875.00
02/11/26	ERR	Telephone call with RCBO representatives, Covington, Committee counsel and coverage counsel regarding potential settlement structure.	0.50	\$625.00

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02/11/26	ERR	Review case status and issues related to potential coverage and claims regarding insurers with M. Kemner.	0.50	\$625.00
02/11/26	ERR	Review additional written discovery to insurers.	0.80	\$1,000.00
02/11/26	MR	Perform analysis of privileged strategy matters in relation to upcoming trials of underlying claims (.4); attend teleconference with E. Ridley regarding case law research relating to privileged strategy matters (.2); research case law relating to privileged strategy matters (.9).	1.50	\$1,275.00
02/12/26	ERR	Review legal analysis regarding assignment related to settlement and issues regarding recovery of claims.	1.00	\$1,250.00
02/12/26	MR	Complete case law research relating to privileged strategy matters in insurance coverage action.	3.20	\$2,720.00
02/16/26	ERR	Edit client report.	0.50	\$625.00
02/18/26	ERR	Review potential settlement terms from other matters.	0.50	\$625.00
02/18/26	MR	Perform analysis regarding privileged insurance coverage strategic considerations in relation to insurance coverage action.	0.80	\$680.00
02/23/26	MR	Email communications with E. Ridley regarding privileged strategy matters for insurance coverage action (.2); assess discovery needs in insurance coverage action (.3); draft joint status update for submission on February 25, 2025 in insurance coverage action, per order from Judge Corley (.9).	1.40	\$1,190.00
02/24/26	ERR	Telephone call with Dentons (counsel for Travelers) regarding tender to excess insurers, submittal of report to insurers and coverage regarding potential exposure regarding state court matter.	0.70	\$875.00
02/24/26	ERR	Edit joint case management statement.	0.50	\$625.00
02/24/26	ERR	Edit discovery requests to insurers.	0.80	\$1,000.00

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02/24/26	MR	Continue drafting joint status update for submission on February 25, 2026 in insurance coverage action pursuant order from Judge Corley, per edits and comments received from insurers (3.3); telephone call with counsel for Travelers regarding edits to joint status update (.1); attend teleconference with counsel for Travelers regarding insurance coverage matters for John Doe OK 1022 claim set for March 16, 2026 trial (.4); telephone call with E. Ridley in follow-up to same (.1).	3.90	\$3,315.00
02/24/26	SJM	Comment on status statement for District Court to address bankruptcy issues.	0.40	\$370.00
02/25/26	AMUE	Provide advice regarding status report for coverage litigation and communications with insurers regarding same.	1.00	\$1,225.00
02/25/26	ERR	Review additional edits to joint case management statement.	1.20	\$1,500.00
02/25/26	JCH	File joint status update in District Court case.	0.20	\$84.00
02/25/26	MDL	Revise status conference statement regarding status of negotiations with insurers.	0.20	\$200.00
02/25/26	MDL	Strategize regarding settlement possibilities with additional insurers.	0.40	\$400.00
02/25/26	MDL	Strategize with Foley team, M. Kemner, and Covington team regarding negotiations with Travelers over confidential matter relating to lift stay abuse claim trials.	0.50	\$500.00
02/25/26	MR	Continue revising joint status update per insurers' comments, and finalize and coordinate filing of same (1.8); email communications with R. Ridley regarding privileged insurance coverage issues (.2); email communications with counsel for CNA regarding discovery-related matters in insurance coverage action (.3).	2.30	\$1,955.00
		Task Total:	37.10	\$38,801.50

**032 Rule 2004 Motions/Discovery/Subpoenas**

02/03/26	SJM	Analyze prior discovery and rulings regarding certain discovery issues (1.1); email to A. Uetz regarding same (2).	1.30	\$1,202.50
02/24/26	KAFA	Prepare November and December 2025 MOR supplemental requests for production to Committee.	0.40	\$192.00
02/24/26	MDL	Evaluate November, December, and January MOR supplements in advance of production to Committee.	0.30	\$300.00
02/25/26	KAFA	Prepare January 2025 MOR supplemental requests for production to Committee (.2); update index of post-bankruptcy document productions (.1).	0.30	\$144.00
		Task Total:	2.30	\$1,838.50

**034 Other Motion Practice**

02/03/26	SJM	Analyze Committee objection to motion to amend interim compensation procedures and begin outlining argument for same (1.6); call with A. Uetz regarding approach to hearing (.3); call with M. Lee regarding same (.6).	2.50	\$2,312.50
02/10/26	MWBE	Follow up with S. Moses regarding potential tasks.	0.10	\$67.50
02/10/26	SJM	Review Committee's proposed order on motion to amend interim compensation (.2); email to B. Weisenberg and G. Albert regarding same (.1).	0.30	\$277.50
02/13/26	JCH	Finalize and file periodic report regarding CTN (.2); finalize and file opposition to Macias stay motion and A. Bardos' declaration in support (.4).	0.60	\$252.00
02/24/26	AMUE	Provide advice regarding motion to retain unknown abuse claims representative.	0.70	\$857.50
02/24/26	SJM	Email correspondence regarding preparation of pro hac vice motion for D. Goroff.	0.30	\$277.50
02/25/26	JCH	Prepare D. Goroff pro hac vice application and order.	0.50	\$210.00

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02/25/26	MDL	Email exchange with J. Hogan regarding motion to appoint him as successor unknown abuse claims representative.	0.30	\$300.00
02/25/26	MDL	Email exchange with J. Hogan regarding motion to appoint him as successor unknown abuse claims representative.	0.10	\$100.00
02/25/26	MDL	Provide instruction to T. Dolcourt regarding motions to appoint claims reviewer and survivors' trustee.	0.20	\$200.00
02/25/26	TND	Draft motion for appointment of successor unknown claims representative (1.4); review correspondence regarding same (.2).	1.60	\$1,408.00
02/26/26	JCH	File D. Goroff pro hac vice application and upload proposed order.	0.50	\$210.00
02/26/26	MDL	Strategize regarding motion to appoint J. Hogan as successor unknown abuse claims representative.	0.20	\$200.00
02/26/26	SJM	Revise motion to appoint successor unknown claims representative.	3.10	\$2,867.50
02/26/26	TND	Further drafting of motion to appoint successor unknown claims representative and related declaration and proposed order (1.8); correspondence with team regarding same (.2).	2.00	\$1,760.00
02/27/26	MDL	Revise motion to appoint J. Hogan as replacement unknown abuse claims representative and supporting declaration.	0.40	\$400.00
02/27/26	SJM	Further updates to motion to appoint successor unknown claims representative (.6); emails to J. Hogan and Committee counsel regarding same (.4).	1.00	\$925.00
Task Total:			14.40	\$12,625.00

**037 Financing**

02/13/26	MCM	Analysis of potential financing issues prior to February 17 hearing/status conference.	0.70	\$735.00
02/17/26	MCM	Revisions to DIP term sheet with RCC.	0.80	\$840.00

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02/18/26	MRL	Confer with M. Moore regarding drafting the Debtor's DIP motion.	0.20	\$160.00
02/19/26	MRL	Continue drafting the Debtor's DIP motion.	0.60	\$480.00
02/19/26	SJM	Direct M. Rofaail regarding Ninth Circuit law and local rules for preparation of DIP financing motion.	0.70	\$647.50
02/20/26	MRL	Continue drafting the Debtor's DIP motion.	1.70	\$1,360.00
02/21/26	MCM	Attention to DIP issues following filing of fourth amended plan.	0.40	\$420.00
02/23/26	MCM	Revisions to RCC DIP term sheet and related documents (1.5); email and other correspondence regarding same (.4); meeting with M. Rofaail regarding next steps (.3); continue working on DIP issues (1.0); email correspondence with counsel for RCC regarding term sheet and/or need for credit agreement (.3).	3.50	\$3,675.00
02/23/26	MDL	Revise DIP term sheet.	0.40	\$400.00
02/23/26	MDL	Strategize with Foley team regarding DIP term sheet and eventual definitive agreement.	0.20	\$200.00
02/23/26	MRL	Confer with M. Moore regarding revisions to the term sheet for the DIP motion (.2); continue drafting the Debtor's DIP motion (2.4); email correspondence with the Foley team regarding the same (.3).	2.90	\$2,320.00
02/23/26	SJM	Analyze issues related to DIP financing (1.1); email to M. Moore and M. Lee regarding same (.3).	1.40	\$1,295.00
02/24/26	MRL	Continue drafting the Debtor's DIP motion (1.0); analyze examples of credit agreements (.3); email correspondence with M. Moore regarding the same (.2).	1.50	\$1,200.00
02/25/26	MDL	Revise DIP term sheet.	0.10	\$100.00
02/25/26	MRL	Confer with M. Moore regarding updating the term sheet (.3); revise the Debtor's DIP motion to conform to the term sheet (1.0); draft the proposed interim order granting the Debtor's DIP motion (1.5).	2.80	\$2,240.00

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02/26/26	MCM	Revisions to DIP term sheet to incorporate interim and final borrowing arrangements based on cash needs (.6); email correspondence with various parties, including RCC, regarding same (.4).	1.00	\$1,050.00
02/26/26	MDL	Revise DIP term sheet.	0.30	\$300.00
02/26/26	MRL	Revise the DIP Term Sheet (.5); correspondence with M. Moore regarding the same (.2); continue drafting the Debtor's DIP motion to conform to the DIP term sheet (1.4); continue drafting the interim DIP order granting the Debtor's DIP motion (.5).	2.60	\$2,080.00
02/27/26	MCM	Email correspondence with counsel for RCC regarding DIP loan and term sheet for same (.3); review term sheet revisions (.3).	0.60	\$630.00
02/27/26	MRL	Draft the proposed final DIP order granting the Debtors' DIP motion.	0.50	\$400.00
Task Total:			22.90	\$20,532.50

**038 Mediation**

02/01/26	MRL	Email correspondence with A. Uetz regarding researching competing plans in other diocese cases (.2); analyze specific diocese cases for competing plans (.7).	0.90	\$720.00
02/02/26	MDL	Participate in mediation session with Lowenstein and Burns Bair teams to discuss confidential mediation topics.	0.80	\$800.00
02/02/26	MDL	Strategize with Foley team regarding positions to take with Committee in forthcoming mediation session.	0.30	\$300.00
02/02/26	MRL	Continue analyzing specific diocese cases for competing plans.	2.40	\$1,920.00
02/03/26	MRL	Continue analyzing specific diocese cases for competing plans (1.3); draft an email to A. Uetz regarding the outcome of the research (.4).	1.70	\$1,360.00

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02/12/26	MDL	Evaluate summary of Committee position on insurance assignment and settlements.	0.10	\$100.00
			Task Total:	6.20 \$5,200.00

**039 JCCP 5108 Litigation (Case No. HG19048685) – Claim No. 63**

02/01/26	ERR	Edit status analysis and prepare for discussion with Travelers' representatives.	1.50	\$1,875.00
02/01/26	ERR	Review authority regarding coverage claims regarding ratification.	1.00	\$1,250.00
02/01/26	JRBL	Telephone conference with T. Carlucci regarding trial strategy, juror profiles and themes.	0.80	\$1,260.00
02/01/26	LFG	Review Bishop Barber's deposition transcript (.5); call with T. Carlucci regarding trial strategy (.6); edit letter to Travelers (.4); prepare strategy memo to team on best evidence of knowledge (.6); review bankruptcy team's overall strategy report (.3).	2.40	\$3,180.00
02/01/26	TFCA	Review all emails and edits to Travelers (1.0); review witness deposition (2.0); telephone call with J. Blease regarding strategy (.8); review witness list and draft email regarding motion in limine regarding witness list (.3).	4.10	\$6,252.50
02/02/26	AMUE	Meeting with Foley trial team and insurer regarding upcoming case.	0.70	\$857.50
02/02/26	AMUE	Meeting with E. Ridley regarding privileged matter concerning upcoming trial.	0.60	\$735.00
02/02/26	AROU	Finalize stipulation and order for independent mental examination.	0.40	\$400.00
02/02/26	AROU	Strategize regarding Court's order denying request for a stay.	0.70	\$700.00
02/02/26	AROU	Analyze Clergy III deposition transcripts of non-party potential trial witness.	1.90	\$1,900.00
02/02/26	AROU	Analyze documents produced during course of discovery in preparation for trial.	1.70	\$1,700.00
02/02/26	AROU	Call with Travelers.	0.70	\$700.00
02/02/26	AROU	Strategize regarding defense presentation at trial.	1.20	\$1,200.00

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02/02/26	DBG	Review appellate record and communications M. Roberts regarding organization of RCBO request for stay.	3.60	\$5,220.00
02/02/26	ERR	Review case status and strategy regarding trial.	0.50	\$625.00
02/02/26	ERR	Edit letter to Travelers regarding fees and pending coverage issues.	0.60	\$750.00
02/02/26	ERR	Telephone conference with Travelers representatives regarding case status and strategy.	1.50	\$1,875.00
02/02/26	JRBL	Research past themes for closing argument in a similar case to guide preparation for trial.	2.30	\$3,622.50
02/02/26	JRBL	Conference with Travelers regarding updates.	0.80	\$1,260.00
02/02/26	JRDO	Analyze appellate motion to stay proceedings.	0.20	\$135.00
02/02/26	JRDO	Draft analysis on research findings related to privileged matters for trial preparation.	1.10	\$742.50
02/02/26	JRDO	Research California law on privileged matter.	1.80	\$1,215.00
02/02/26	JRDO	Research California law on privileged matter.	4.50	\$3,037.50
02/02/26	KAFA	Prepare motion in limine (.8); attend call with Travelers to discuss defense (.7); prepare and transmit deposition transcripts to Travelers (.3); prepare trial witness summaries for team (5.7); meeting with J. Doti to discuss preparation of information for motion in limine (.5).	8.00	\$3,840.00
02/02/26	LFG	Review proposed witness list and information (.5); work with J. Doti on motion in limine regarding exclusion of testimony of other victims (.7); work with K. Farrar on same (.2).	1.40	\$1,855.00
02/02/26	MR	Complete initial draft of motion to Second District appellate court to stay trial, including case law research on applicable standard for discretionary stays and review of relevant Bankruptcy Court docket entries regarding purpose of lifting automatic stay for certain cases.	6.80	\$5,780.00
02/02/26	SJM	Attend update meeting with Travelers regarding case status (.8); finalize notes from meeting (.2).	1.00	\$925.00

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02/02/26	TFCA	Draft motion in limine instructions to J. Doti (.3); prepare outline for call with Travelers (1.0); review Covington changes/edits to Travelers letter (.3); attend call regarding same (1.0); review RCBO status statement in bankruptcy (.3); draft email response to L. Glahn regarding motion in limine (.3); emails regarding deposition logistics (.2); emails with K. Farrar regarding privileged trial preparation matters (.5).	3.90	\$5,947.50
02/02/26	WD	Coordinate logistics for independent mental examination (.1); finalize, serve and coordinate filing of stipulation and proposed order for mental health examination of plaintiff (.3); draft motion to stay superior court proceedings and strategize regarding the same (1.1).	1.50	\$720.00
02/03/26	AROU	Draft stipulation and proposed order extending pretrial deadlines.	0.80	\$800.00
02/03/26	AROU	Strategize regarding deposition plan for potential trial witnesses on plaintiff's preliminary witness list.	0.50	\$500.00
02/03/26	AROU	Strategize regarding California case law and analysis concerning privileged trial preparation matter.	0.90	\$900.00
02/03/26	AROU	Strategize and conference with appellate counsel regarding motion to stay to Second District Court of Appeal.	0.80	\$800.00
02/03/26	AROU	Revise motion to stay to Second District Court of Appeal.	0.90	\$900.00
02/03/26	AROU	Call with expert witness Dr. Adam Brown.	0.20	\$200.00
02/03/26	AROU	Analyze Clergy III deposition transcripts of non-party potential trial witness.	1.70	\$1,700.00
02/03/26	DBG	Revise draft motion for stay (3.0); review relevant filings and legal authority regarding same (5.6); conference with A. Ouellette and M. Roberts regarding same (.4).	9.00	\$13,050.00
02/03/26	ERR	Review case status and issues regarding defense and coverage issues regarding conduct of trial.	0.50	\$625.00
02/03/26	JRBL	Analysis of jury verdicts in preparation for trial.	3.30	\$5,197.50

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02/03/26	JRDO	Strategize with attorney team on drafting motion in limine.	0.70	\$472.50
02/03/26	JRDO	Begin to research California law regarding privileged trial strategy matters.	1.20	\$810.00
02/03/26	KAFA	Prepare information for inclusion in motion in limine (2.4); meeting with J. Doti and L. Glahn regarding same (.7); meetings with J. Doti regarding same (.6); prepare trial witness summaries for team (1.2).	4.90	\$2,352.00
02/03/26	LFG	Work with K. Farrar and J. Doti on motion in limine regarding exclusion of evidence of other abuse.	1.30	\$1,722.50
02/03/26	MR	Attend strategy call with D. Goroff and A. Ouellette regarding motion to appellate court (.6); telephone call with A. Ouellette regarding privileged pretrial strategy matters (.2); revise appellate motion to stay trials (.5).	1.30	\$1,105.00
02/03/26	TFCA	Review witness information (.2); review update emails (.3); telephone call with J. Blease regarding jury verdicts research and strategy (.5); emails with R. Simons regarding various depositions (.5); emails with M. Kemner regarding discovery issues (.3); review Committee's status statement regarding settlement (.3); review research from J. Doti regarding admissibility issues and respond regarding further research (.5); discuss same with J. Blease (.2).	2.80	\$4,270.00
02/03/26	WD	Circulate filed version of stipulation and [proposed] order for mental examination of plaintiff (.1); coordinate retrieval of example appellate motions to stay (.2); coordinate IME logistics (.2); attention to application for pro hac vice admission of L. Glahn (.3); strategize regarding preparation of motion to stay superior court proceedings (.3); attention to issue with pro hac vice motion not on court's website, including communications with courtroom and civil clerks (.3); assist with preparation of motion to stay (.7).	2.10	\$1,008.00
02/04/26	AROU	Strategize regarding and revise draft motion to stay in Court of Appeal.	5.90	\$5,900.00

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02/04/26	AROU	Correspond with Dr. Shelby regarding order authorizing independent mental examination.	0.10	\$100.00
02/04/26	AROU	Call with appellate counsel regarding draft motion to stay in Court of Appeal.	0.70	\$700.00
02/04/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	0.80	\$800.00
02/04/26	AROU	Strategize regarding California case law regarding privileged matters.	0.40	\$400.00
02/04/26	AROU	Strategize regarding procedure for expert depositions and obtaining testimony of plaintiff expert witnesses as trial testimony via deposition.	0.60	\$600.00
02/04/26	AROU	Correspond with appellate counsel regarding draft motion to stay in Court of Appeal.	0.50	\$500.00
02/04/26	DBG	Revise sections of motion to Court of Appeal for stay (3.0); conferences with M. Roberts and A. Ouellette regarding same (.6); review legal research regarding same (4.0); review E. Ridley edits (.5); prepare for (.8) and lead (.7) conference with P. Batalden, D. Zamora, and A. Ouellette regarding form of pleading for relief requested and strategy regarding same.	9.60	\$13,920.00
02/04/26	JRDO	Draft analysis regarding privileged trial preparation strategy.	1.00	\$675.00
02/04/26	JRDO	Continue to research California law on privileged matters.	3.30	\$2,227.50
02/04/26	KAFA	Continue to prepare information for motion in limine including research and summarize key issues for L. Glahn and J. Doti (2.6); analyze Dr. Brown's report (.7); meeting with K. Shelly regarding Transcript Genius (1.3); coordinate scheduling of depositions of 4 trial witnesses (.4); coordinate preparation of deposition notices for 4 trial witnesses (.3); analysis of Bishop Barber's deposition transcript related to sealing of testimony related to accused party and request copy of the transcript with the sealed/confidential testimony removed (1.2); obtain Bishop Barber's deposition exhibits (.2); analysis of updated draft motion to court of appeal regarding stay (.5); prepare exhibits to motion to court of appeal regarding stay (.7).	7.90	\$3,792.00

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02/04/26	LFG	Edit designated witness summaries related to motion in limine to exclude testimony of other abuse.	1.70	\$2,252.50
02/04/26	MR	Draft petition for writ of mandate to court of appeal regarding trial court's denial of request for stay of trials.	3.60	\$3,060.00
02/04/26	TFCA	Emails with A. Ouellette regarding expert depositions (.3); telephone call with J. Blease regarding same (.2); work with K. Farrar regarding Bishop Barber deposition issue (.2); emails with R. Simons regarding deposition schedule (.3); review emails regarding P. Batalden, M. Roberts, and E. Ridley comments regarding petition regarding stay (1.0); begin review of cases regarding J. Doti research (.5).	2.50	\$3,812.50
02/04/26	WD	Draft stipulation and [proposed] order regarding motions in limine (.4); address issues with pro hac vice motion not appearing on hearing list (.2); coordinate IME logistics (.1); docket IME (.1); teleconference with clerk of court regarding page limits for motions (.1); amend verified application of L. Glahn to appear pro hac vice (.3); serve and submit same with supporting declaration and [proposed] order for e-filing (.2); submit same to the CA Bar and pay required fee (.5); research requirements for [proposed] orders in appellate court (.3); research procedures for expedited review of motions in appellate court (.5); draft notices of deposition (.5); draft motion for judicial notice and [proposed] order regarding the same (1.0); draft [proposed] order granting motion to stay (.1); draft declaration in support of motion to stay (.3); prepare exhibits to motion for judicial notice and declaration in support of motion to stay (.2).	4.80	\$2,304.00
02/05/26	AROU	Strategize regarding deposition scheduling.	0.30	\$300.00
02/05/26	AROU	Revise draft petition for writ of mandate.	3.30	\$3,300.00
02/05/26	AROU	Correspond with plaintiff's counsel regarding independent mental examination of plaintiff.	0.40	\$400.00

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02/05/26	DBG	Team communications regarding edits and comments to draft motion for stay and communications with M. Roberts and A. Ouellette regarding same.	1.30	\$1,885.00
02/05/26	ERR	Revise writ of mandate regarding stay.	1.50	\$1,875.00
02/05/26	JRBL	Develop trial strategy and themes for opening and closing arguments.	3.20	\$5,040.00
02/05/26	JRDO	Draft analysis on privileged trial strategy matters.	0.60	\$405.00
02/05/26	JRDO	Continue to research California law on privileged trial strategy matters.	2.00	\$1,350.00
02/05/26	KAFA	Coordination of obtaining confidential version of Bishop Barber's deposition transcript (.5); transmittal of Bishop Barber's deposition transcript and exhibits to L. Grealish of MPBF (.2); finalization of deposition notices for 4 trial witnesses (.7); prepare proposed order on L. Glahn pro hac vice application for A. Ouellette (.4); extract exhibits and OCR Clergy III deposition transcripts for current trial witnesses and import into Transcript Genius for further comparison and analysis (1.2); analysis of Bishop Barber's deposition transcript and exhibits (.6); management of upcoming IME of plaintiff (.3).	3.90	\$1,872.00
02/05/26	MR	Continue revising petition for writ of mandate to appellate court, based on comments received from D. Goroff, E. Ridley, A. Ouellette and T. Carlucci.	4.40	\$3,740.00
02/05/26	TFCA	Review bellwether case verdict and background (.3); follow-up emails regarding notices of deposition (.2); emails regarding correcting Bishop Barber's deposition (.2); review Chubb NY article (.1).	0.80	\$1,220.00
02/05/26	WD	Circulate filed/endorsed version of L. Glahn pro hac vice papers (.1); amend deposition notices for 4 witnesses (.5).	0.60	\$288.00
02/06/26	AROU	Correspond with joint defense group regarding petition for writ of mandate.	0.30	\$300.00
02/06/26	AROU	Attend joint defense group call regarding petition for writ of mandate.	0.60	\$600.00

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02/06/26	AROU	Revise draft petition for writ of mandate.	2.90	\$2,900.00
02/06/26	AROU	Correspond with plaintiff's counsel and coordinate independent mental examination of plaintiff.	0.50	\$500.00
02/06/26	AROU	Call with Dr. Shelby.	0.20	\$200.00
02/06/26	AROU	Strategize regarding deposition of plaintiff's current therapist.	0.60	\$600.00
02/06/26	DBG	Revise several drafts of petition for writ of mandate for stay of trials (3.1); team communications regarding same (.8); strategy conference with counsel from other dioceses regarding petition and follow up regarding same (1.0).	4.90	\$7,105.00
02/06/26	ERR	Edit mandate petition regarding Prop 51 and trial stay request.	2.00	\$2,500.00
02/06/26	JRBL	Develop arguments for trial.	1.30	\$2,047.50
02/06/26	JRDO	Research California law on admissibility of deposition testimony at trial in preparation for drafting motion in limine.	1.00	\$675.00
02/06/26	KAFA	Prepare and transmit deposition transcript of Bishop Barber to M. Kemner for review and execution (.3); preparation of information for Dr. Shelby for IME (.2).	0.50	\$240.00
02/06/26	MR	Further revisions to petition for writ of mandate requesting stay of trials.	1.70	\$1,445.00
02/06/26	TFCA	Review accused-party allegations (.3); send Bishop Barber's deposition transcript to M. Kemner (.2); emails with M. Lee regarding update on bankruptcy hearing and strategy issues (.3); telephone call with J. Blease regarding cases and analysis and strategy (.5); review updated petition for writ and provide edits (.5); attend call with Prop 51 appeal team (.5); emails with A. Ouellette regarding expert depositions and related issues (.4); review Supreme Court case regarding suppressing depositions (.3); review J. Blease analysis regarding another case (.2).	3.20	\$4,880.00
02/06/26	WD	Strategize regarding preparation of petition for writ of mandate and supporting documents (.2); coordinate IME logistics (.1).	0.30	\$144.00

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02/07/26	WD	Fact and cite check petition for writ of mandate (2.7); draft motion for judicial notice in support of petition for writ of mandate (.7); draft [proposed] order in support of motion for judicial notice (.4); draft declaration of T. Carlucci in support of writ of mandate (.3); draft proof of service for petition for writ and supporting papers (.3); draft appendix for petition for writ of mandate (.3).	4.70	\$2,256.00
02/08/26	DBG	Communications with P. Batalden, L. Potts, and T. Carlucci regarding petition for writ to stay.	0.30	\$435.00
02/08/26	JRDO	Continue to research California law on privileged trial strategy matter.	1.70	\$1,147.50
02/08/26	TFCA	Review email update from A. Uetz regarding settlement negotiations (.3); review revised motion to stay (.4); review photos sent by R. Simons (.2).	0.90	\$1,372.50
02/08/26	WD	Update petition for writ of mandate and all supporting papers, including adding exhibit citations to writ (3.2); prepare exhibits to writ, motion for judicial notice and declaration in support (.6).	3.80	\$1,824.00
02/09/26	AROU	Analyze California case law regarding admissibility of certain evidence.	0.30	\$300.00
02/09/26	AROU	Revise draft declaration, request for judicial notice, exhibits, and proposed order in support of petition for writ of mandate.	1.70	\$1,700.00
02/09/26	AROU	Calls with counsel for Archdiocese of San Francisco regarding subpoena for seminary records and potential subpoena for testimony of Archbishop.	0.50	\$500.00
02/09/26	AROU	Strategize regarding transcript of deposition of witness.	1.10	\$1,100.00
02/09/26	AROU	Correspond with R. Simons and Dr. Shelby regarding independent mental examination.	0.10	\$100.00
02/09/26	AROU	Strategize regarding expert report of Dr. Brown.	1.40	\$1,400.00
02/09/26	AROU	Revise petition for writ of mandate.	1.90	\$1,900.00
02/09/26	DBG	Review final edits of L. Potts, E. Ridley, and J. Blease (1.6); communications with A. Ouellette regarding same (.4).	2.00	\$2,900.00

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02/09/26	ERR	Make final edits regarding petition for stay of trial.	1.20	\$1,500.00
02/09/26	JRBL	Finalize writ petition and accompanying declaration, motion for judicial notice, etc.	4.30	\$6,772.50
02/09/26	JRDO	Research California requirements and procedure for filing motion in limine.	0.60	\$405.00
02/09/26	KAFA	Prepare for depositions of 4 deponents including gathering information, documents and draft deposition outlines (6.7); summarize document collection from the client related to the accused party including seminarian files (.5); analysis of filed petition for writ of mandate and J. Blease declaration in support (.2).	7.40	\$3,552.00
02/09/26	MR	Perform final revisions, and proofread all papers to be filed with appellate court for petition for writ of mandate to stay trials.	2.40	\$2,040.00
02/09/26	TFCA	Attend to witness stipulation (.3); email J. Blease regarding same (.2); emails with K. Farrar regarding preparation for depositions (.5); emails regarding live or deposition testimony for expert for plaintiff (.3); work on motion to stay review issues and filing (1.0); review materials provided by K. Farrar regarding preparation for depositions (2.0); review update on settlement discussions and emails with J. Blease regarding same (.6); emails with K. Farrar and J. Blease regarding four bellwether cases needed for trial setting (.3); review filed CMC order (.2); emails regarding Archbishop testimony and strategy regarding same with A. Ouellette (.3); emails regarding accused party seminary file (.3); emails with R. Simons regarding witness's evidentiary issues (.4).	6.40	\$9,760.00
02/09/26	WD	Finalize petition for writ of mandate, and supporting motion for judicial notice, [proposed] order, declaration and proof of service (3.9); open new case and file same (.5); download and circulate filed versions (.2); serve same via Case Anywhere (.2).	4.80	\$2,304.00
02/10/26	AMUE	Meeting with Foley litigation team regarding trial strategy.	0.80	\$980.00

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02/10/26	AROU	Strategize regarding trial preparation and pretrial task list.	1.00	\$1,000.00
02/10/26	AROU	Revise stipulation to continue motion in limine deadline and communicate with R. Simons regarding same.	0.50	\$500.00
02/10/26	AROU	Call with liaison counsel for the institutional defendants.	0.50	\$500.00
02/10/26	AROU	Strategize regarding CACI jury instructions.	1.50	\$1,500.00
02/10/26	AROU	Strategize regarding stipulated extension of motion in limine deadline.	0.20	\$200.00
02/10/26	AROU	Strategize regarding deposition of L. Robbins.	0.70	\$700.00
02/10/26	AROU	Analyze transcript from deposition of Dr. Landsman in preparation for trial and expert depositions.	0.70	\$700.00
02/10/26	ERR	Review analysis of case law regarding ratification vis a vis insurance coverage regarding negligence claims.	1.50	\$1,875.00
02/10/26	ERR	Review case status and cover all case strategy with bankruptcy and trial teams.	0.80	\$1,000.00
02/10/26	JRBL	Analysis of privileged issues and draft recommendations to client and carrier (2.3); telephone conference with T. Carlucci regarding trial issues (1.1); analysis of Friars term sheet (.3); telephone conference with A. Uetz regarding strategy (.7).	4.40	\$6,930.00
02/10/26	JRDO	Begin to draft motion in limine.	2.60	\$1,755.00
02/10/26	JRDO	Strategize with attorney team on drafting motion in limine.	1.40	\$945.00
02/10/26	JRDO	Research California law on privileged trial strategy matters.	1.60	\$1,080.00

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02/10/26	KAFA	Continued deposition preparation including gathering information and documents and updating deposition outlines (1.7); draft witness summaries for motion in limine (2.5); prepare and transmit additional documents to Dr. Brown (.4); analysis of Dr. Brown's draft report and provide feedback to A. Ouellette (.6); analysis of plaintiff's deposition transcript in preparation for upcoming depositions (2.2).	7.40	\$3,552.00
02/10/26	LFG	Calls with litigation and bankruptcy teams regarding defense and insurance strategy (.8); work with J. Doti and T. Carlucci on motions in limine (2.1).	2.90	\$3,842.50
02/10/26	MDL	Strategize with Foley team regarding trial, insurance issues relating to same, and bankruptcy crossover issues.	0.80	\$800.00
02/10/26	TFCA	Telephone call with team regarding settlement updates (.5); respond to emails from L. Glahn regarding witness scope of testimony (.3); emails with R. Simons regarding jury instructions and admission of liability (.3); emails regarding scheduling regarding motions in limine and opposition with A. Ouellette and J. Blease (.5); review emails from M. Kemner regarding several issues (.3); work on preparation for depositions with K. Farrar, including review of outlines and revise regarding same (2.0); review case citation provided by E. Ridley regarding coverage issues (.4); emails with R. Simons regarding witness testimony and admission (.5); review Friars settlement position regarding carve-out cases (.3).	5.10	\$7,777.50
02/11/26	AMUE	Provide advice regarding privileged issue concerning upcoming trial (.9); revisions to communications with client leadership regarding same (.4); analyze issue with Foley team (.5).	1.80	\$2,205.00
02/11/26	AROU	Correspond regarding meet and confer call to discuss anticipated trial subpoena to Archbishop.	0.10	\$100.00
02/11/26	AROU	Analyze expert report of Dr. Brown.	0.80	\$800.00
02/11/26	AROU	Analyze correspondence from Court of Appeal regarding petition for writ of mandate.	0.20	\$200.00

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02/11/26	AROU	Strategize regarding deposition testimony of accused party in preparation for trial.	1.20	\$1,200.00
02/11/26	AROU	Finalize stipulation to continue motion in limine deadline and correspond with R. Simons regarding same.	0.10	\$100.00
02/11/26	AROU	Strategize regarding deposition of L. Robbins.	0.30	\$300.00
02/11/26	AROU	Strategize regarding defense presentation at trial in light of applicable CACI jury instructions.	1.10	\$1,100.00
02/11/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	0.80	\$800.00
02/11/26	AROU	Strategize regarding trial preparation, pretrial task list, and approach for completion of fact and expert discovery.	0.90	\$900.00
02/11/26	ERR	Provide email to Burns Bair, J. Prol and M. Kemner regarding factual background in state court case regarding insurance demands.	0.50	\$625.00
02/11/26	ERR	Review case law regarding coverage issues for trial preparation.	1.00	\$1,250.00
02/11/26	JRBL	Analysis of coverage for state court matter and develop trial strategy.	1.40	\$2,205.00
02/11/26	JRBL	Analysis of expert report and potential testimony at trial.	2.30	\$3,622.50
02/11/26	JRBL	Conference with client and E. Ridley and A. Uetz regarding insurance issues.	0.80	\$1,260.00
02/11/26	JRDO	Continue to draft motion in limine.	2.80	\$1,890.00
02/11/26	JRDO	Continue to research California law on privileged trial strategy matter.	1.20	\$810.00
02/11/26	KAFA	Continued deposition preparation (1.6); update witness summaries for motion in limine (2.1).	3.70	\$1,776.00
02/11/26	LFG	Work with J. Doti on motion in limine regarding exclusion of testimony (.6); review insurer communications regarding defense (.2).	0.80	\$1,060.00
02/11/26	MR	Review correspondence received from Second District Court of Appeal and confirm transfer of petition for writ of mandate to correct appellate division.	0.20	\$170.00

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02/11/26	TFCA	Emails with Z. Rutman regarding trial scheduling and coverage (.3); emails regarding settlement updates (.3).	0.60	\$915.00
02/11/26	TFCA	Begin review of jury instructions (.5); emails with R. Simons regarding same (.2); attend call regarding insurance issues with team (.5); prepare for four depositions (5.0); telephone call with J. Stein regarding deposition (.2).	6.40	\$9,760.00
02/11/26	WD	Amend, finalize and serve stipulation and [proposed] order regarding motions in limine (.2); coordinate e-filing of same (.1); emails with opposing counsel regarding filing of same (.1).	0.40	\$192.00
02/12/26	AROU	Strategize regarding deposition of trial witness 2.	0.20	\$200.00
02/12/26	AROU	Analyze plaintiff's proposed special jury instructions and the authorities cited in support.	0.90	\$900.00
02/12/26	AROU	Strategize regarding deposition of trial witness 1.	0.20	\$200.00
02/12/26	AROU	Strategize regarding deposition of trial witness 3.	0.20	\$200.00
02/12/26	AROU	Strategize regarding and draft outline for deposition of trial witness 4.	1.40	\$1,400.00
02/12/26	AROU	Strategize regarding expert reports of Richard Shaw, M.D.	1.90	\$1,900.00
02/12/26	AROU	Strategize regarding response to plaintiff's proposed special verdict form.	0.50	\$500.00
02/12/26	AROU	Strategize regarding trial preparation, pretrial task list, and approach for completion of fact and expert discovery.	1.80	\$1,800.00
02/12/26	AROU	Strategize regarding defense presentation at trial in light of applicable CACI jury instructions.	1.40	\$1,400.00
02/12/26	AROU	Strategize regarding plaintiff's proposed jury instructions and compare to CACI instructions.	1.30	\$1,300.00
02/12/26	AROU	Strategize regarding deposition of trial witness.	0.20	\$200.00
02/12/26	ERR	Continue to review materials in trial preparation regarding coverage effect.	1.00	\$1,250.00
02/12/26	JRBL	Analysis of deposition summaries in preparation for trial.	2.30	\$3,622.50

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02/12/26	JRBL	Communications with Z. Rutman regarding jury instructions.	0.10	\$157.50
02/12/26	JRBL	Work on jury instructions.	2.20	\$3,465.00
02/12/26	JRDO	Continue to draft motion in limine.	3.20	\$2,160.00
02/12/26	JRDO	Begin to draft additional motions in limine.	1.90	\$1,282.50
02/12/26	JRDO	Strategize with attorney team on drafting motions in limine.	0.80	\$540.00
02/12/26	KAFA	Prepare for and attend 4 trial witness depositions (5.6); review plaintiff's proposed jury instructions (.3); analysis of Foley team comments on Dr. Brown's expert report and provide responses related to same (.4); draft assignment tracking chart (.4); continue to research and prepare information on witnesses for motions in limine (1.2).	7.90	\$3,792.00
02/12/26	LFG	Work with J. Doti on motions in limine (.7); edit motion on other victims (.6).	1.30	\$1,722.50
02/12/26	MDL	Strategize with T. Carlucci regarding potential for settlement of state court matter.	0.20	\$200.00
02/12/26	TFCA	Prepare for depositions (.8); attend four depositions (5.6); meet with R. Simons regarding trial issues (.5); emails with E. Ridley regarding ratification issues (.2); respond to emails regarding motions in limine from J. Doti (.4); numerous emails from R. Simons regarding various trial issues and exhibits (.5); draft email to client regarding trial strategy recommendation (.3); review settlement updates from A.Uetz regarding state cases (.2); telephone call with M. Lee regarding settlement issues and update (.3).	8.80	\$13,420.00
02/12/26	WD	Assist with preparing cost estimate for trial.	0.70	\$336.00
02/13/26	AROU	Strategize regarding witness's deposition testimony in advance of meet and confer call with R. Simons.	0.80	\$800.00
02/13/26	AROU	Attend meet and confer call with R. Simons.	0.20	\$200.00
02/13/26	AROU	Trial team conference regarding defense strategy and action items for compliance with pretrial deadlines.	1.10	\$1,100.00

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02/13/26	AROU	Calls with liaison counsel for the institutional defendants.	0.30	\$300.00
02/13/26	AROU	Call with Dr. Shelby.	0.70	\$700.00
02/13/26	AROU	Strategize regarding defense presentation and approach to jury instructions, verdict form, trial brief, and exhibit and witness list.	1.10	\$1,100.00
02/13/26	ERR	Begin review of jury instructions and counters.	1.50	\$1,875.00
02/13/26	ERR	Review case strategy for trial.	1.00	\$1,250.00
02/13/26	JRBL	Work on trial testimony and excerpts of depositions identified by plaintiff.	4.30	\$6,772.50
02/13/26	JRDO	Research California authority in preparation for continuing to draft motion in limine.	2.00	\$1,350.00
02/13/26	JRDO	Continue to draft motion in limine on privileged trial strategy matter.	5.80	\$3,915.00
02/13/26	JRDO	Research California authority on privileged trial strategy matter in preparation for drafting motion in limine.	1.10	\$742.50
02/13/26	JRDO	Draft motion in limine.	3.90	\$2,632.50
02/13/26	KAFA	Analysis of plaintiff's amended expert disclosure and corresponding reports and information as to the retained experts (.8); analysis of perpetrator's plea judgment (.2); prepare plaintiff's trial witness testimony from trial transcripts for attorney review (.3); attend call with Dr. Shelby to discuss IME (.7); call with Foley team to discuss trial preparation (1.0); prepare and transmit additional documents for Dr. Shelby's review (.7); prepare trial prep documentation for team including previous trial briefs, opening and closing statements, witness lists, motions in limine and jury instructions (1.1); prepare general and key admissions summaries for testimony designated by plaintiff for ten trial witnesses (1.5); call with Dr. Shelby to discuss analysis of plaintiff's production (.3).	6.60	\$3,168.00
02/13/26	LFG	Edit draft motion in limine on privileged trial strategy issue.	1.00	\$1,325.00

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02/13/26	MR	Attend strategy meeting regarding pretrial matters with T. Carlucci, J. Blease, E. Ridley, A. Ouellette, J. Doti and K. Farrar (1.1); begin drafting trial brief (1.7).	2.80	\$2,380.00
02/13/26	TFCA	Telephone call with team regarding task list (1.0); telephone call with Dr. Shelby and follow up with records (.7); confer with J. Blease regarding status (.4); review expert report and provide comments (.8); review bellwether case article (.3); attention to designation of testimony and timing for response emails with R. Simons and team (.5); review update emails regarding settlement (.3); review task list and outstanding issues and emails with K. Farrar, J. Blease and A. Ouellette regarding same (1.0).	5.00	\$7,625.00
02/13/26	WD	Attention to docketing pretrial deadlines.	0.10	\$48.00
02/14/26	JRBL	Analysis of motion in limine #1 and cases cited in preparation for hearing.	2.30	\$3,622.50
02/14/26	JRBL	Work on jury instructions.	1.40	\$2,205.00
02/14/26	KAFA	Prepare summaries of deposition and trial testimony for use at trial.	1.00	\$480.00
02/14/26	TFCA	Emails with R. Simons regarding witness (.2); emails with A. Ouellette regarding expert scheduling (.2); emails with A. Ouellette and J. Blease regarding task list and various issues regarding trial prep (.7) review draft motion in limine #1 (.5).	1.60	\$2,440.00
02/15/26	JRDO	Strategize with attorney team on revising motion in limine.	0.20	\$135.00
02/15/26	JRDO	Strategize with attorney team on other motions in limine.	0.20	\$135.00
02/15/26	KAFA	Prepare accused party trial testimony summaries (.3); prepare summary of plaintiff's education from deposition, fact sheet and trial witness testimony (.4); analysis of motion in limine No. 1 (.3).	1.00	\$480.00

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02/15/26	TFCA	Review witness testimony comparison (.4); review testimony regarding plaintiff high school issues (.2); finish review of motion in limine #1 and provide comments to J. Doti (.5); emails with R. Simons regarding outstanding depositions (.2); emails with R. Simons regarding timing of opposition regarding motions in limine (.2); emails with R. Simons regarding witness stipulation (.2); email to J. Doti regarding witness's motion in limine regarding issues to review (.2); review R. Simons' position regarding Archbishop testimony (.2).	2.10	\$3,202.50
02/16/26	AROU	Strategize regarding expert witness depositions and defense presentation at trial.	1.80	\$1,800.00
02/16/26	ERR	Review potential jury instructions.	1.00	\$1,250.00
02/16/26	JRBL	Revise motions in limine for filing.	1.30	\$2,047.50
02/16/26	JRDO	Continue researching California law on privileged trial strategy matter.	2.50	\$1,687.50
02/16/26	JRDO	Begin to research California law on privileged trial strategy matter in preparation for revising motion in limine.	1.50	\$1,012.50
02/16/26	JRDO	Begin to revise motion in limine.	3.90	\$2,632.50
02/16/26	LFG	Edit motions in limine (1.5); work with J. Blease on trial strategy (.3); communications with M. Lee regarding bankruptcy settlement status (.3).	2.10	\$2,782.50
02/16/26	MR	Continue drafting trial brief.	2.10	\$1,785.00
02/16/26	TFCA	Review emails from A. Uetz regarding settlement issues (.8); telephone call with J. Blease regarding same (.3); review draft email in response regarding same (.2); review R. Simons' email regarding stipulation in connection with expert report and discuss with A. Ouellette and respond to R. Simons regarding same (.6); review citations in accused party's 2005 deposition (.3); attention to trial schedules with team (.3).	2.50	\$3,812.50
02/17/26	AROU	Strategize regarding expert report of Dr. Jennifer Keller.	0.80	\$800.00
02/17/26	AROU	Strategize regarding expert witness depositions and defense presentation at trial.	1.20	\$1,200.00

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02/17/26	AROU	Conference with trial team regarding trial presentation.	0.50	\$500.00
02/17/26	AROU	Correspond with R. Simons regarding expert testing data.	0.10	\$100.00
02/17/26	AROU	Call with M. Kemner and A. Bardos regarding trial strategy.	0.60	\$600.00
02/17/26	AROU	Call with R. Simons.	0.40	\$400.00
02/17/26	AROU	Strategize regarding defense presentation at trial.	0.90	\$900.00
02/17/26	AROU	Call with liaison counsel for the institutional defendants.	0.30	\$300.00
02/17/26	ERR	Telephone call with counsel for parties regarding coverage issues in trial.	0.80	\$1,000.00
02/17/26	ERR	Attend trial preparation conference call with M. Kemner regarding strategy and coverage issues (.6); prepare for same (.4).	1.00	\$1,250.00
02/17/26	ERR	Continue to work on jury instructions.	1.00	\$1,250.00
02/17/26	JRBL	Work on in limine motions (1.4); analysis of cases supporting motions (1.9).	3.30	\$5,197.50
02/17/26	JRBL	Telephone conference with clients regarding case strategy.	0.50	\$787.50
02/17/26	JRBL	Revise defense jury instructions.	2.30	\$3,622.50
02/17/26	JRDO	Revise motion in limine regarding privileged trial strategy.	4.90	\$3,307.50
02/17/26	JRDO	Research California law on privileged trial strategy matter in preparation for revising motion in limine.	3.20	\$2,160.00

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02/17/26	KAFA	Prepare jury instruction analysis comparing 2005 instructions with the 2026 proposed instructions (1.9); draft expert deposition tracking chart (.6); prepare analyses of witness testimony from 3 depositions and 2 days of other trial (1.4); coordinate court reporter and videographer for deposition of L. Robbins (.4); prepare summary for deposition preparation of L. Robbins (.8); prepare summary of accused party's prior arrest (.4); analysis of Dr. Keller's expert report (.4); analysis of three additional expert reports (1.1); prepare summary of notes from review of expert reports (.5).	7.50	\$3,600.00
02/17/26	TFCA	Telephone call with J. Blease regarding trial strategy (.5); review materials to draft plaintiff's case presentation to prepare for telephone call with client regarding admission of liability issues (2.3); listen to status conference in bankruptcy (1.5); edit motion in limine #1 (1.0); attend call with client and Foley team regarding privileged matter (.6); follow up regarding accused party's prior arrest with K. Farrar (.3); review Archbishop motion to quash (.2); review witness summaries from J. Doti (.3); review research assignment from J. Doti regarding witness (.2); review trial briefs in previous case (.5).	7.40	\$11,285.00
02/18/26	AROU	Correspond with R. Simons regarding expert and motion in limine deadlines and scheduling expert depositions.	0.20	\$200.00
02/18/26	AROU	Call with Dr. Brown.	0.70	\$700.00
02/18/26	AROU	Strategize regarding expert deposition scheduling and expert deposition preparation.	1.20	\$1,200.00
02/18/26	ERR	Continued review of plaintiff's proposed jury instructions and basis for objection.	2.50	\$3,125.00
02/18/26	ERR	Review report and fee submissions for coverage.	0.80	\$1,000.00
02/18/26	JRBL	Telephone conference with co-counsel regarding jury instructions.	0.80	\$1,260.00
02/18/26	JRBL	Draft additional jury instructions and add CACI instructions left out by plaintiff.	1.30	\$2,047.50

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02/18/26	JRDO	Strategize with attorney team on privileged trial strategy matter.	0.20	\$135.00
02/18/26	KAFA	Attend call with expert Dr. Brown to discuss revisions to expert report (.7); prepare questions for deposition of L. Robbins (1.8); locate and review jury questionnaire and orders on jury instructions from Clergy III and circulate to team (1.0); identify previous motion in limine orders for J. Doti (.8); begin to draft questions for deposition of witness (.7).	5.00	\$2,400.00
02/18/26	LFG	Analyze case law in support of motions in limine (.8); edit drafts (.3).	1.10	\$1,457.50
02/18/26	MR	Continue drafting trial brief.	1.80	\$1,530.00
02/18/26	SAFA	Analyze California case law regarding privileged trial strategy matter to prepare motions in limine (2.0); analyze California court standards on additional privileged trial strategy matters to prepare motions in limine (2.0); draft memorandum summarizing findings regarding California case law analysis (2.0); summarize California case law citing to analogous authority addressing the standard for notice in certain cases (.9).	6.90	\$4,140.00
02/18/26	TFCA	Prepare for call regarding jury instructions (.4); telephone call regarding jury instructions with co-counsel (.6); follow-up call regarding same (.3); review damages research and send to group and email S. Fakhimi to follow up regarding same (.6); communications with client regarding admission of liability (.6); edit memo to Travelers regarding comments and updates (1.2); review emails with R. Simons and A. Ouellette regarding experts (.3); jury consultant research (.4).	4.40	\$6,710.00
02/19/26	AROU	Correspond with R. Simons regarding expert deposition scheduling.	0.10	\$100.00
02/19/26	AROU	Strategize regarding expert deposition scheduling and expert deposition preparation.	0.70	\$700.00
02/19/26	AROU	Call with J. Shelby.	0.30	\$300.00
02/19/26	AROU	Call with liaison counsel for the institutional defendants.	0.30	\$300.00

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02/19/26	AROU	Attend meet and confer call with R. Simons and D. Zamora regarding subpoena to Archbishop.	0.30	\$300.00
02/19/26	ERR	Review recent verdicts regarding abuse cases for analysis.	0.50	\$625.00
02/19/26	ERR	Review case status and strategy in coordination with bankruptcy proceedings and state court trial.	0.50	\$625.00
02/19/26	ERR	Edit final pretrial report to Travelers.	1.50	\$1,875.00
02/19/26	JDOR	Background check regarding opposing expert witness J. Jones.	0.50	\$150.00
02/19/26	JRBL	Revise final pre-trial report to carrier.	1.20	\$1,890.00
02/19/26	JRDO	Strategize with attorney team on drafting declarations and using exhibits in support of motions in limine.	0.70	\$472.50
02/19/26	JRDO	Draft all declarations and proposed orders for motions in limine and begin to gather exhibits to be used in motions.	4.80	\$3,240.00
02/19/26	KAFA	Research opposing expert J. Jones' expert exclusions (.4); prepare attachments to confidential status update letter to Travelers (.8); call with J. Doti regarding motions in limine (.5); prepare information for inclusion in motions in limine (.9); update expert deposition tracking chart (.2); draft questions for J. Jones' expert deposition (1.1); review local rules (.4); strategize regarding juror questionnaire, including review of Clergy III orders regarding same (1.0).	5.30	\$2,544.00
02/19/26	LFG	Analyze motions in limine and related documents (.2); analyze case law and evidentiary rules (.9); communications with J. Doti (.2).	1.30	\$1,722.50
02/19/26	MR	Continue drafting trial brief (1.4); internal email communications regarding privileged pretrial strategy matters (.4).	1.80	\$1,530.00
02/19/26	SAFA	Analyze California case law regarding privileged trial strategy matter to support drafting and argument of motions in limine.	0.70	\$420.00

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02/19/26	TFCA	Emails regarding draft to insurance and comments regarding same (.5); review research and email questions to S. Fakhimi regarding same (.5); complete review of Travelers letter and send (.2); respond to email from M. Kemner regarding strategy and expert (.3); review email from J. Doti regarding motion in limine rulings in Clergy III (.3); follow up on research and emails regarding same (.3).	2.10	\$3,202.50
02/19/26	WD	Call with Clerk of Court regarding pro hac vice hearing issue (.2) and email with Dept. 21 regarding the same (.2).	0.40	\$192.00
02/20/26	AROU	Strategize regarding objections to plaintiff's deposition designations.	0.70	\$700.00
02/20/26	AROU	Strategize regarding JCCP 5108 joint case management conference statement.	0.20	\$200.00
02/20/26	DBG	Prepare for (.5) and participate in (.8) all outside counsel conference regarding outline of return regarding petition; communications with D. Zamora and T. Carlucci regarding same (.7).	2.00	\$2,900.00
02/20/26	ERR	Review communications with Travelers regarding pre-trial final report.	0.50	\$625.00
02/20/26	ERR	Review damages jury instructions.	1.00	\$1,250.00
02/20/26	JRDO	Research California law on notices to produce documents and appear for trial under Section 1987 in preparation for objecting to plaintiff's requests for Bishop Barber to appear at trial and produce documents.	3.10	\$2,092.50
02/20/26	JRDO	Strategize with attorney team on drafting citations for motions in limine.	0.40	\$270.00

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02/20/26	KAFA	Schedule expert depositions with Steno and SF Foley office (1.1); prepare and transmit documents to Dr. Shelby for review (.9); process final deposition transcripts for trial witnesses (.5); prepare juror questionnaire documents and information for review by team (.5); review deposition transcript testimony and update motion in limine No. 1 (2.6); review and circulate notice to Bishop Barber to appear and to produce documents at trial (.3); upload materials for Travelers review to TitanFile (.3); prepare RCBO closing argument excerpts from previous trial for T. Carlucci (1.2); update expert deposition tracking chart (.3).	7.70	\$3,696.00
02/20/26	MR	Continue drafting trial brief (1.7); email communications regarding privileged pretrial strategy matters (.3).	2.00	\$1,700.00
02/20/26	TFCA	Confer with E. Ridley regarding Travelers edits etc., and follow-up emails regarding Covington issues (1.0); attention to deposition signing issue (.3); attend to issues regarding mini-fact sheets (.3); attend Prop 51 appellate call (.4); review damages jury instructions (.3).	2.30	\$3,507.50
02/20/26	WD	Emails with Dept. 21 and case team regarding issue with pro hac vice hearing (.1); assist D. Goroff with locating appellate filing (.3).	0.40	\$192.00
02/21/26	DBG	Edits to outline of return regarding plaintiffs' writ regarding Prop. 51 (5.1); review legal authority regarding same (3.0).	8.10	\$11,745.00
02/21/26	JRDO	Strategize with attorney team on drafting objections to Section 1987 notice.	0.30	\$202.50
02/21/26	JRDO	Strategize with attorney team on responding to plaintiff's Section 1987 notice.	0.10	\$67.50
02/21/26	LFG	Edit motions in limine (.7); communications with J. Doti and T. Carlucci regarding same (.2).	0.90	\$1,192.50
02/21/26	TFCA	Review case management statement (.2); work on subpoena analysis (.4); research and response to R. Simons' 1987(b) subpoena (.6); edit three motions in limine (2.5).	3.70	\$5,642.50
02/22/26	ERR	Revise draft of jury questionnaire.	2.00	\$2,500.00

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02/22/26	ERR	Analyze plaintiffs' jury instructions.	1.00	\$1,250.00
02/22/26	ERR	Continue to edit draft jury instructions.	1.50	\$1,875.00
02/22/26	JRBL	Analysis of in limine motions in preparation for hearing.	1.30	\$2,047.50
02/22/26	JRDO	Strategize with attorney team on revising motion in limine in connection with privileged trial strategy matter.	0.40	\$270.00
02/22/26	JRDO	Research California law on privileged trial strategy matter in preparation for revising motion in limine.	2.50	\$1,687.50
02/22/26	JRDO	Revise motion in limine to address arguments from plaintiff.	0.70	\$472.50
02/22/26	JRDO	Revise motion in limine.	0.50	\$337.50
02/22/26	JRDO	Strategize with attorney team on revising motions in limine.	0.50	\$337.50
02/22/26	LFG	Edit motions in limine, proposed orders and declarations (1.3); review all case law (1.7); call with J. Doti regarding same (.4).	3.40	\$4,505.00
02/22/26	TFCA	Review plaintiff designations of transcripts and draft email with assignments regarding same (1.0); telephone call and emails with J. Doti regarding motions in limine (.6); analyze LA Archdiocese case regarding certain fact issues and draft response to J. Doti regarding same (1.0); review task list (.5); finalize motion in limine No. 3 (.4).	3.50	\$5,337.50
02/23/26	AROU	Strategize regarding trial presentation.	0.60	\$600.00
02/23/26	AROU	Draft outline for deposition of plaintiff's expert, Dr. Jones.	3.00	\$3,000.00
02/23/26	AROU	Call with Dr. Shelby.	0.90	\$900.00
02/23/26	AROU	Strategize regarding motions in limine.	0.90	\$900.00
02/23/26	AROU	Strategize regarding preparation for deposition of plaintiff's expert, Dr. Keller.	0.80	\$800.00
02/23/26	AROU	Draft outline for deposition of plaintiff's expert, L. Robbins.	1.60	\$1,600.00

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02/23/26	ERR	Finalize defendant's draft proposed jury instructions.	4.50	\$5,625.00
02/23/26	ERR	Make further edits to jury questionnaire.	1.50	\$1,875.00
02/23/26	JRBL	Analysis of evidence exclusion arguments in support of in limine motions.	2.30	\$3,622.50
02/23/26	JRDO	Analyze plaintiff's designated former trial and deposition testimony in preparation for revising motion in limine.	1.50	\$1,012.50
02/23/26	JRDO	Strategize with attorney team on drafting citations and exhibits for all motions in limine.	0.50	\$337.50
02/23/26	JRDO	Revise motion in limine by incorporating additional arguments to respond to plaintiff's arguments.	2.50	\$1,687.50
02/23/26	JRDO	Revise motion in limine on privileged trial strategy matter.	4.70	\$3,172.50
02/23/26	JRDO	Continue to strategize with attorney team on revising motions in limine.	0.50	\$337.50
02/23/26	KAFA	Prepare deposition outline for Dr. Keller (2.5); prepare citations referenced in motion in limine No. 1 (1.2); prepare information related to privileged trial strategy issues (.4); begin to review and isolate plaintiff's designations of prior testimony for assigned trial witnesses and prepare objections and proposed counter-designations (1.4); analysis of Dr. Brown's final expert report (.5); call with Dr. Shelby regarding deposition of L. Robbins (1.0); prepare summary of call with Dr. Shelby (.6).	7.60	\$3,648.00
02/23/26	LFG	Revise motions in limine.	1.20	\$1,590.00
02/23/26	MAZA	Research on jury instructions regarding privileged trial strategy issues.	2.00	\$1,200.00
02/23/26	MJY	Review witness's deposition citations from February 8, 2023 deposition and compile corresponding excerpts for trial preparation, noting any incomplete or unclear citations for follow up.	0.70	\$301.00
02/23/26	MR	Continue drafting trial brief.	1.70	\$1,445.00

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02/23/26	SAFA	Review motions in limine and corresponding declaration to identify and address citation gaps (1.0); add and cross-check citations to supporting exhibits (1.5); conform and verify case citations and authorities to ensure accuracy, consistency, and readiness of the filings for submission (.4).	2.90	\$1,740.00
02/23/26	TFCA	Review task list and updates (.3); emails with R. Simons regarding updates and stipulation regarding witness (.7); review Dr. Keller's report (2.0); review Dr. Landsman's deposition and plaintiff designation and cross designate (1.5); review depositions of accused party to prepare for cross-designations and email R. Simons regarding same (.5); emails with J. Blease regarding LA Diocese case (.3); telephone call with J. Doti regarding MIL #1 argument and analysis regarding privileged trial strategy matter (.3); prepare for damages call with M. Kemner (.4).	6.00	\$9,150.00
02/24/26	AROU	Conduct deposition of Dr. Jones, plaintiff's expert witness.	1.30	\$1,300.00
02/24/26	AROU	Strategize regarding pretrial filing meet and confer.	0.50	\$500.00
02/24/26	AROU	Conference with trial team regarding juror questionnaire.	1.00	\$1,000.00
02/24/26	AROU	Strategize regarding defense presentation at trial.	0.80	\$800.00
02/24/26	AROU	Draft outline for deposition of plaintiff's expert Dr. Jones.	2.20	\$2,200.00
02/24/26	AROU	Call from Dr. Shelby.	0.10	\$100.00
02/24/26	AROU	Draft outline for deposition of plaintiff's expert, L. Robbins.	4.70	\$4,700.00
02/24/26	DBG	Review denial of writ and team communications regarding same.	0.20	\$290.00
02/24/26	ERR	Continue editing juror questionnaire.	3.00	\$3,750.00
02/24/26	JRBL	Work on jury questionnaire.	1.00	\$1,575.00
02/24/26	JRBL	Revise in limine motions to exclude evidence.	1.80	\$2,835.00
02/24/26	JRBL	Revise special jury instructions.	1.70	\$2,677.50

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02/24/26	JRDO	Research California law on secondary evidence rule and objecting to requests to produce original copies of documents at trial in preparation for responding to Section 1987 notice from plaintiff.	1.10	\$742.50
02/24/26	JRDO	Research California law on privileged trial strategy matter.	1.60	\$1,080.00
02/24/26	JRDO	Revise motion in limine No. 3 to account for stipulation with plaintiff.	0.50	\$337.50
02/24/26	JRDO	Continue to revise motion in limine No. 1 including refining legal arguments, editing case and exhibit citations, and clarifying factual references to supporting declaration.	2.20	\$1,485.00
02/24/26	JRDO	Strategize with attorney team on drafting motions to seal and sealing exhibits for motions in limine.	1.00	\$675.00
02/24/26	JRDO	Continue to revise motion in limine No. 2 including refining legal arguments, editing case and exhibit citations, and clarifying factual references to supporting declaration.	2.60	\$1,755.00
02/24/26	JRDO	Research California law on requirements and procedure for filing motions to seal in preparation for drafting motions to seal exhibits in support of motions in limine.	0.70	\$472.50
02/24/26	JRDO	Analyze pre-trial meet and confer requirements and draft table of requirements for all deadlines.	0.40	\$270.00
02/24/26	JRDO	Draft motion to seal and supporting documents for motion in limine No. 1.	2.50	\$1,687.50

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02/24/26	KAFA	Continue to review and isolate plaintiff's designations of prior testimony for various trial witnesses and prepare objections and proposed counter-designations (4.7); prepare analysis of accused party's 2005 and 2023 deposition testimony for inclusion in motion in limine 3 as requested by J. Doti (.5); call with Dr. Shelby regarding deposition of witness (1.4); prepare summary of call with Dr. Shelby and counterarguments (.8); analysis of draft jury instructions and juror questionnaire (.5); call with team to discuss same (1.0); review JCCP 5108 document productions for documents requested in notice to Bishop Barber to appear and produce documents at trial (.8) and prepare summary of same for attorneys (.3); prepare and transmit documents requested by Dr. Shelby (.3); prepare information for team regarding materials to seal within exhibits to motions in limine (.5).	10.80	\$5,184.00
02/24/26	LFG	Calls with J. Doti and T. Carlucci (.6); further edits to motions in limine (2.4); review transcripts of prior trial and depositions for objections and counter-designations (1.5).	4.50	\$5,962.50
02/24/26	MAZA	Continue research on jury instructions concerning privileged trial strategy matters.	2.40	\$1,440.00
02/24/26	MJY	Continue to review witness's deposition citations from February 8, 2023 deposition and compiled corresponding excerpts for trial preparation, noting any incomplete or unclear citations for follow-up.	1.20	\$516.00
02/24/26	MJY	Review witness's deposition citations from August 9, 2005 deposition and compiled corresponding excerpts for trial preparation, noting any incomplete or unclear citations for follow-up.	2.10	\$903.00
02/24/26	MJY	Edit pleading for RBCO's counter-designation of prior testimony for use at trial.	0.90	\$387.00
02/24/26	MR	Continue drafting trial brief (1.3); analyze documents in response to plaintiff's request for production of certain materials at trial (.7); draft counter-designations and objections to plaintiff's pretrial deposition designations (1.9).	3.90	\$3,315.00

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02/24/26	SAFA	Prepare exhibits for motion in limine No. 3 and accompanying declaration to ensure clear evidentiary support (1.5); substantively revise motion in limine No. 1 and declaration to improve clarity, legal arguments, and client-facing presentation prior to filing (2.5); conduct detailed analysis of deposition and trial transcripts for use by plaintiff at trial to verify, refine, and bolster citations and evidentiary bases in support of motion in limine No. 2 (3.9).	7.90	\$4,740.00
02/24/26	TFCA	Prepare for call with Dr. Shelby (.5); telephone call with Dr. Shelby regarding prep for deposition (1.5); attend to appellate court decision (.4); review 2023 deposition for cross-designation (2.6); telephone call with L. Glahn regarding motions in limine, cross-designations and scheduling (.6); telephone call with J. Doti regarding motions in limine and cross-designations (.5); review draft questionnaire to prepare for call with team regarding same and attend call (1.5); meet with A. Ouellette regarding task list and other issues for trial (.5); telephone call with M. Kemner regarding damages analysis (.6); finalize motions in limine for M. Kemner (.4).	9.10	\$13,877.50
02/24/26	WD	Assist with preparation of motions in limine, including strategizing regarding filing under seal.	1.90	\$912.00
02/25/26	AROU	Revise draft motion to quash subpoena to Archbishop.	0.60	\$600.00
02/25/26	AROU	Strategize regarding and prepare for deposition of L. Robbins, plaintiff's expert and treating therapist.	1.40	\$1,400.00
02/25/26	AROU	Attend call with C. Nicolette and M. Ostarch Weiss (Travelers).	0.50	\$500.00
02/25/26	AROU	Strategize regarding takeaways from the deposition of L. Robbins.	0.40	\$400.00
02/25/26	AROU	Conduct deposition of L. Robbins, plaintiff's therapist and expert.	2.50	\$2,500.00
02/25/26	AROU	Attend JCCP 5108 case management conference.	1.10	\$1,100.00
02/25/26	AROU	Analyze expert report of Dr. Adam Brown.	0.50	\$500.00

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02/25/26	AROU	Strategize regarding and draft stipulation with plaintiff.	0.80	\$800.00
02/25/26	AROU	Strategize regarding and finalize pretrial filings.	2.10	\$2,100.00
02/25/26	ERR	Telephone call with Travelers representatives regarding trial strategy.	1.00	\$1,250.00
02/25/26	ERR	Review pre-trial preparations with trial team.	1.00	\$1,250.00
02/25/26	ERR	Edit special jury instructions for defendant.	1.50	\$1,875.00
02/25/26	ERR	Edit statement regarding liability.	0.50	\$625.00
02/25/26	ERR	Attend conference call with RCBO team regarding coverage issues vis a vis the trial.	0.50	\$625.00
02/25/26	ERR	Review issues regarding Travelers regarding report on matter.	0.50	\$625.00
02/25/26	JRBL	Review exhibits attached to request for judicial notice and develop strategy for response.	2.20	\$3,465.00
02/25/26	JRBL	Analysis of plaintiff witness testimony to develop defense themes.	3.30	\$5,197.50
02/25/26	JRDO	Finalize all three motions in limine and two motions to seal, including supporting documents, by revising arguments and citations, confirming supporting evidence and exhibits, and preparing final versions for filing and service.	5.20	\$3,510.00
02/25/26	JRDO	Analyze all exhibits to motions in limine for accuracy and material needing to be filed under seal.	1.70	\$1,147.50
02/25/26	JRDO	Strategize with attorney team on revising motion in limine No. 3.	0.30	\$202.50
02/25/26	JRDO	Revise motion in limine No. 3.	0.60	\$405.00
02/25/26	JRDO	Begin to draft counter-designations and objections to two former victims and one former trial witness designated by plaintiff to provide testimony at trial.	3.50	\$2,362.50
02/25/26	JRDO	Revise motion to seal exhibits in support of motion in limine No. 2 to add additional exhibits to be sealed.	0.50	\$337.50

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02/25/26	KAFA	Finalize exhibits to motions in limine (1.5); prepare for deposition of L. Robbins (.5); attend deposition of L. Robbins (2.4); review plaintiff's designations of prior testimony and prepare counter-designations and objections (3.9); begin to prepare trial exhibits and list (.4).	8.70	\$4,176.00
02/25/26	LFG	Analyze testimony of witnesses and prepare counter-designations and objections to same (1.3); work with J. Doti on filing motions in limine and trial designations (1.9).	3.20	\$4,240.00
02/25/26	MJY	Assist K. Farrar with reviewing attorneys' counter-designations to prior testimony and objections to plaintiff's designations (2.0); revise RCBO's counter-designation and objection pleadings to reflect the same in preparation for trial (.8).	2.80	\$1,204.00
02/25/26	MJY	Review pre-trial order for format of trial exhibit list (.1); create trial exhibit list shell (.3).	0.40	\$172.00
02/25/26	MR	Continue revising trial brief (1.1); continue drafting counter-designations and objections to plaintiff's pretrial deposition designations (1.7); prepare for and attend case management conference in JCCP 5108 proceedings (1.1).	3.90	\$3,315.00
02/25/26	SAFA	Continue to conduct analysis of deposition and trial transcripts for use by plaintiff at trial to verify, refine, and bolster citations in support of motion in limine No. 2 (1.0); draft motion to seal exhibits to motion in limine No. 2, supporting declaration, and proposed order to protect confidential materials in preparation for filing motions in limine (2.0); revise motion in limine No. 1 to confirm accuracy and completeness of deposition citations and corresponding exhibits (1.0); revise supporting exhibits to motion in limine No. 1 to prepare for filing (.4).	4.40	\$2,640.00
02/25/26	SJM	Attend call with Foley team and client regarding coverage issues for trial (.5); attend call with Travelers representatives regarding case status (1.0).	1.50	\$1,387.50

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02/25/26	TFCA	Pre-Travelers call prep (.5); attend call with Travelers (1.0); prepare for and attend case management conference (1.0); emails regarding Travelers regarding updates (.5); work on stipulation regarding admission of liability (.5); emails with team regarding updates on counter-designations (.5); work on accused party counter-designations (4.0); prepare for expert deposition (1.0); attend to filing motions (.5).	9.50	\$14,487.50
02/25/26	WD	Assist with preparation, filing and service of motions in limine and motions to seal.	7.60	\$3,648.00
02/26/26	AROU	Strategize regarding and revise draft stipulation with plaintiff.	0.70	\$700.00
02/26/26	AROU	Analyze final version of Dr. Brown's report.	0.80	\$800.00
02/26/26	AROU	Strategize regarding and draft witness list.	0.60	\$600.00
02/26/26	AROU	Strategize regarding trial presentation and the scope of trial and admissible evidence.	1.80	\$1,800.00
02/26/26	AROU	Strategize regarding and revise draft trial brief.	1.60	\$1,600.00
02/26/26	AROU	Strategize regarding plaintiff's pretrial filing in preparation for Court-ordered meet and confer.	1.90	\$1,900.00
02/26/26	AROU	Strategize regarding takeaways from deposition of Dr. Keller.	0.40	\$400.00
02/26/26	AROU	Strategize regarding and draft exhibit list.	0.60	\$600.00
02/26/26	AROU	Attend pretrial meet and confer with plaintiff's counsel.	0.50	\$500.00
02/26/26	AROU	Call with Dr. Shelby.	0.50	\$500.00
02/26/26	ERR	Review stipulation and communicate with insurers regarding same.	1.60	\$2,000.00
02/26/26	JRBL	Analysis of testimony excerpts (2.9); revise stipulation (.3).	3.20	\$5,040.00
02/26/26	JRDO	Research procedure and requirements for requesting 402 evidence hearing in preparation for drafting request for hearing.	1.60	\$1,080.00
02/26/26	JRDO	Strategize with attorney team on case status following pre-trial meet and confer with plaintiff's counsel.	0.50	\$337.50

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02/26/26	JRDO	Continue to draft counter-designations and objections to two former victims, one former trial witness, and one perpetrator designated by plaintiffs to provide testimony at trial.	3.70	\$2,497.50
02/26/26	JRDO	Begin to revise and finalize all counter-designations and objections for all witnesses plaintiff designated to provide testimony at trial.	2.10	\$1,417.50
02/26/26	JRDO	Meet and confer with plaintiff's counsel on pre-trial submission filing.	0.60	\$405.00
02/26/26	KAFA	Prepare for deposition of expert J. Keller (1.2); attend deposition of expert J. Keller (3.3); continue to prepare counter-designations and objections to plaintiff's designations of prior testimony (2.7); draft trial exhibit list (2.0); prepare trial witness list (.8).	10.00	\$4,800.00
02/26/26	LFG	Analyze testimony of witnesses and prepare counter-designations and objections to same (5.2); calls with A. Uetz and J. Blease regarding cases designated for trial (.8); call with client on same (.7); edit trial brief (1.0).	7.70	\$10,202.50
02/26/26	MJY	Assist K. Farrar with reviewing attorneys' counter-designations to prior testimony and objections to plaintiff's designations (5.5); revise RCBO's counter-designation and objection pleadings to reflect the same in preparation for trial (2.2).	7.70	\$3,311.00
02/26/26	MR	Complete initial draft of trial brief (3.3); continue drafting counter-designations and objections to plaintiff's pretrial deposition designations (1.8); analyze case law in relation to certain plaintiff submissions to the Court (.4); telephone call with A. Ouellette regarding privileged pretrial strategy matters (.2).	5.70	\$4,845.00
02/26/26	TFCA	Telephone call with J. Blease regarding stipulation and other trial issues (.5); numerous emails with team regarding same (1.0); telephone call with M. Kemner regarding updates (.3); finalize stipulation (.5); prepare for expert deposition (3.1); attend same (3.4); meet and confer call with plaintiff's counsel and follow up (1.5); attention to 998 offer (.5).	10.80	\$16,470.00

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02/26/26	WD	Assist with preparation of counter-designations and objections to designations.	0.20	\$96.00
02/27/26	AROU	Trial team conferences and strategize regarding trial presentation and finalization of pretrial filings.	3.40	\$3,400.00
02/27/26	AROU	Analyze California case law regarding privileged trial strategy matter.	0.90	\$900.00
02/27/26	ERR	Review status of pre-trial preparation and issues regarding instructions.	0.90	\$1,125.00
02/27/26	ERR	Review communications from insurers regarding privileged matter.	1.20	\$1,500.00
02/27/26	JRBL	Revise trial brief (.8); analysis of plaintiff damages claim for being exposed to other cases in JCCP 5108 and develop theories on privileged trial strategy matter (1.4); develop trial strategy (1.1).	3.30	\$5,197.50
02/27/26	JRDO	Draft correspondence to plaintiff's counsel on Section 1987 notice.	0.40	\$270.00
02/27/26	JRDO	Research California authority on privileged trial strategy matter in preparation for revising motions in limine.	3.50	\$2,362.50
02/27/26	JRDO	Strategize with attorney team on revising trial brief and motions in limine following stipulation with plaintiff's counsel.	1.00	\$675.00
02/27/26	JRDO	Research California authority on privileged trial strategy matter in preparation for revising motions in limine.	2.50	\$1,687.50
02/27/26	KAFA	Analysis of updates to RCBO's trial brief (.8); analysis of plaintiff's statement of case, exhibit list, witness list and trial brief (.8); prepare chart of cases set for trial (.5); call with internal Foley team to discuss new strategy for trial (.5); analysis of motion to quash subpoena for Archbishop to appear at trial (.3).	2.90	\$1,392.00
02/27/26	LFG	Edit trial brief (.8); review stipulation with plaintiff (.2); communications with trial team regarding implication of stipulation on filings and trial (.4).	1.40	\$1,855.00

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02/27/26	MR	Continue analysis of case law in relation to plaintiff's motion for judicial notice (.6); revise draft of trial brief (1.4); telephone strategy call with J. Doti regarding privileged pretrial matters (.8); attend pretrial strategy call with T. Carlucci, J. Blease, E. Ridley, J. Doti and K. Farrar (partial) (.5).	3.30	\$2,805.00
02/27/26	SAFA	Research California law regarding privileged trial strategy matters (1.0); prepare email memorandum containing analysis to prepare motions in limine (.9).	1.90	\$1,140.00
02/27/26	TFCA	Telephone call with other parties regarding upcoming trial (.6); telephone call and emails with E. Ridley regarding insurance letters (.5); telephone call with J. Blease regarding strategy (.3); attend team call regarding trial brief and change of direction and task list (1.0); review research regarding damages from J. Doti (.3); review verdict form and discuss with E. Ridley (.2); email regarding same with J. Blease (.2); discuss Bishop Barber's 1987 notice with J. Doti (.2); attention to edits of trial brief (.4); review stipulation and pleadings regarding task list to create agenda for weekend call with team (.5).	4.20	\$6,405.00
02/27/26	WD	Strategize regarding motion in limine filing issues.	0.10	\$48.00
02/28/26	AROU	Correspond with Dr. Adam Brown.	0.10	\$100.00
02/28/26	AROU	Strategize regarding scope of admissible evidence and response to R. Simons regarding stipulation.	0.30	\$300.00
02/28/26	ERR	Review issues regarding pending motions in limine given case status and coverage issues.	0.80	\$1,000.00
02/28/26	JRDO	Strategize with attorney team on draft jury instructions and revising motions in limine.	0.60	\$405.00
02/28/26	MR	Continue revising draft of trial brief.	1.90	\$1,615.00

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02/28/26	TFCA	Review judicial notice filings and issue and email with M. Roberts regarding same (.4); telephone call with L. Glahn regarding update and strategy for motions in limine (.5); telephone call with J. Blease regarding strategy issues (.5); review our draft exhibit and witness list and discuss same with A. Ouellette regarding changes (.4); review R. Simons' email regarding case matters and emails with Foley team regarding same (.4); follow-up telephone call with R. Simons regarding same (.4); emails regarding 1987 request and follow up with R. Simons regarding same (.4); attention to requests from San Bernardino counsel (.3); review jury instructions and draft email regarding research regarding affirmative defenses to J. Doti (.5); review plaintiff's filings regarding list to respond to (.5).	4.30	\$6,557.50
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Task Total:	834.00	\$829,374.50
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**040 JCCP 5108 Litigation (Case No. 22CV020490) – Claim No. 182**

02/06/26	AROU	Call and correspond with co-counsel regarding case strategy.	1.30	\$1,300.00
02/09/26	AROU	Correspond with co-counsel regarding the Court's January 2026 case management conference order in JCCP 5108.	0.20	\$200.00
02/10/26	AROU	Analyze orders supporting arguments in motion to dismiss.	0.30	\$300.00
02/11/26	AROU	Correspond with co-counsel regarding Court's order regarding potential dismissal for failure to serve fact sheets.	0.20	\$200.00
02/11/26	AROU	Strategize regarding draft motion to dismiss.	0.40	\$400.00
02/11/26	MR	Comment on draft motion to dismiss received from S. Caloca.	0.40	\$340.00
02/12/26	KAFA	Review draft motion to dismiss prepared by Taylor Anderson Firm and provide comments to team.	0.30	\$144.00
02/13/26	AROU	Analyze revised draft motion to dismiss.	0.40	\$400.00
02/14/26	JRBL	Revise motion to dismiss.	1.30	\$2,047.50

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02/15/26	TFCA	Review motion to dismiss and email group regarding same (.4); revise case management statement regarding setting four bellwether cases (.3).	0.70	\$1,067.50
02/16/26	AROU	Further revisions to draft motion to dismiss.	1.20	\$1,200.00
02/16/26	TFCA	Attention to issue regarding CMC and emails regarding same (.3); review responses to questions regarding motion from A. Ouellette (.2).	0.50	\$762.50
02/17/26	AROU	Correspond with liaison counsel for plaintiffs regarding motion to dismiss.	0.10	\$100.00
02/17/26	TFCA	Review issues regarding filing of motion to dismiss (.2); review emails from R. Simons regarding same (.1).	0.30	\$457.50
02/19/26	JRBL	Analysis of fact sheet and related filings in response to motion to dismiss.	1.20	\$1,890.00
02/19/26	KAFA	Analysis of plaintiff fact sheet and response to initial document demand.	0.30	\$144.00
02/20/26	JRBL	Analysis of fact sheet against timeline of client documents.	1.40	\$2,205.00
02/20/26	TFCA	Emails regarding plaintiff's response to motion to dismiss (.2); emails with co-counsel regarding same (.3).	0.50	\$762.50
02/21/26	TFCA	Review case management statement.	0.20	\$305.00
02/26/26	TFCA	Emails regarding trial scheduling updates.	0.20	\$305.00
Task Total:			11.40	\$14,530.50

**043 JCCP 5108 Litigation (Case No. 22CV023118) – Claim No. 52**

02/15/26	KAFA	Prepare summary of case information and documents for transmittal to Rutman firm.	0.50	\$240.00
02/15/26	TFCA	Review issues regarding plaintiff and accused party and emails with J. Blease regarding same.	0.30	\$457.50
02/16/26	AROU	Strategize regarding alleged facts underlying plaintiff's claim.	0.60	\$600.00
02/16/26	JRBL	Review file materials, complaint and background to prepare discovery plan.	2.30	\$3,622.50

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02/16/26	JRBL	Review mini fact sheet allegations and background materials in preparation for discovery plan.	2.20	\$3,465.00
02/16/26	TFCA	Discussion regarding adding lawsuit to case management statement with J. Blease.	0.20	\$305.00
02/17/26	TFCA	Emails regarding discovery and telephone call with J. Blease regarding same and follow up with K. Farrar.	0.40	\$610.00
02/18/26	KAFA	Finalize and transmit case documents to Rutman firm.	0.30	\$144.00
Task Total:			6.80	\$9,444.00

**044 JCCP 5108 Litigation (Case No. 22CV02733) – Claim No. 47**

02/15/26	KAFA	Prepare summary of case information and documents for transmittal to Rutman firm.	0.50	\$240.00
02/18/26	KAFA	Finalize and transmit case documents to Rutman firm.	0.30	\$144.00
Task Total:			0.80	\$384.00
Services Total:			1,389.60	\$1,389,563.50

**Professional Services Summary**

Service Provider	Initials	Title	Hours	Rate	Amount
Jack R. Doti	JRDO	Associate	129.20	\$675.00	\$87,210.00
Matthew Zavaro	MAZA	Associate	4.40	\$600.00	\$2,640.00
Mason Roberts	MR	Associate	70.60	\$850.00	\$60,010.00
Mary Rofaeil	MRL	Associate	31.20	\$800.00	\$24,960.00
Michael W. Berg	MWBE	Associate	0.10	\$675.00	\$67.50
Nathan C. Walsh	NCW	Associate	2.90	\$650.00	\$1,885.00
Nora McGuffey	NMCG	Associate	18.20	\$825.00	\$15,015.00
Samantha Fakhimi	SAFA	Associate	24.70	\$600.00	\$14,820.00
Shane J. Moses	SJM	Of Counsel	84.80	\$925.00	\$78,440.00
Jack Dorr	JDOR	Other	0.50	\$300.00	\$150.00
Janelle C. Harrison	JCH	Paralegal	27.00	\$420.00	\$11,340.00
Kerry A. Farrar	KAFA	Paralegal	129.50	\$480.00	\$62,160.00

Melissa J. Yusko	MJY	Paralegal	15.80	\$430.00	\$6,794.00
Wendy DelValle	WD	Paralegal	34.40	\$480.00	\$16,512.00
Ann Marie Uetz	AMUE	Partner	134.20	\$1,225.00	\$164,395.00
Alan R. Ouellette	AROU	Partner	120.70	\$1,000.00	\$120,700.00
David B. Goroff	DBG	Partner	46.70	\$1,450.00	\$67,715.00
Emil P. Khatchaturian	EPK	Partner	5.20	\$1,000.00	\$5,200.00
Eileen R. Ridley	ERR	Partner	69.10	\$1,250.00	\$86,375.00
Geoffrey S. Goodman	GSG	Partner	1.60	\$1,175.00	\$1,880.00
Jason J. Kohout	JJK	Partner	0.30	\$1,100.00	\$330.00
Jeff R. Blease	JRBL	Partner	76.70	\$1,575.00	\$120,802.50
Lisa F. Glahn	LFG	Partner	39.60	\$1,325.00	\$52,470.00
Mark C. Moore	MCM	Partner	77.00	\$1,050.00	\$80,850.00
Matthew D. Lee	MDL	Partner	63.90	\$1,000.00	\$63,900.00
Thomas F. Carlucci	TFCA	Partner	129.30	\$1,525.00	\$197,182.50
Tamar N. Dolcourt	TND	Special Counsel	52.00	\$880.00	\$45,760.00
<b>Totals</b>			<b>1,389.60</b>		<b>\$1,389,563.50</b>

**Expenses Incurred**

<b>Description</b>	<b>Amount</b>
Depositions / Transcripts, Exams	\$5,650.34
Electronic Legal Research Services	\$1,495.18
LSS - eDiscovery Services	\$12,400.00
Other Expenses	\$90.00
Other Fees	\$697.00
Recording / Filing Fees	\$1,398.80
Shipping Charges	\$141.94
Transportation / Travel Expenses	\$2,004.40
<b>Expenses Incurred Total</b>	<b>\$23,877.66</b>

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

**Expense Detail**

**Depositions / Transcripts, Exams**

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Amount</b>
02/23/26	JRBL	Steno Agency - Transcript of deposition of witness conducted on February 12, 2026 - 02/23/26.	\$1,524.66
02/23/26	JRBL	Steno Agency - Transcript of the deposition of witness conducted February 12, 2026 - 02/23/26.	\$698.30
02/23/26	JRBL	Steno Agency - Transcript of the deposition of witness conducted February 12, 2026 - 02/23/26.	\$962.91
02/23/26	JRBL	Steno Agency - Transcript of the deposition of witness conducted February 12, 2026 - 02/23/26.	\$1,030.22
02/24/26	JRBL	Jayme M. Jones - Expert Witness / Deposition - 02/24/26.	\$1,031.25
02/26/26	JRBL	ESCRIBERS, LLC - Transcript - 02/26/26.	\$92.80
02/27/26	JRBL	Jilio-Ryan Hunter & Olsen, Inc - Reporter's Transcript of Proceedings - 02/27/26.	\$310.20
			\$5,650.34

**Electronic Legal Research Services**

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Amount</b>
02/28/26	MR	SEARCH ACCESS CHARGE. DOCKET REPORT. IMAGE2654-0. Westlaw. IMAGE179-0.	\$1,495.18

CONTEXT EXPERT REPORT.

**LSS - eDiscovery Services**

Date	Initials	Description	Amount
02/28/26	JRBL	LSS - eDiscovery Services.	\$12,400.00

**Other Expenses**

Date	Initials	Description	Amount
02/04/26	NFAR	Miscellaneous--VENDOR: U.S. BANK 02/04/26 Document retrieval - court - Wendy Delvalle -.	\$65.00
02/04/26	NFAR	Miscellaneous--VENDOR: U.S. BANK 02/04/26 Document retrieval - court - Wendy Delvalle -.	\$25.00
			\$90.00

**Other Fees**

Date	Initials	Description	Amount
02/02/26	JRBL	CASE ANYWHERE, LLC - System Access fee and Document Service fee - 02/02/26.	\$64.00
02/05/26	WD	Other Fees--VENDOR: Wendy DelValle 02/05/26 Fee for submittal of Pro Hac Vice fee to CA Bar for Lisa Glahn -.	\$615.00
02/07/26	WD	Other Fees--VENDOR: Wendy DelValle 02/07/26 Fee to download filed version of order for writ exhibit. -.	\$7.00
02/20/26	KAFA	Other Fees--VENDOR: Kerry Farrar 02/20/26 retrieve complaint from court system -.	\$11.00
			\$697.00

**Recording / Filing Fees**

Date	Initials	Description	Amount
02/09/26	TFCA	Recording/Filing Fees--VENDOR: Tom Carlucci 02/09/26 Filing fee - Petition for Writ -.	\$6.00
02/09/26	JRBL	ACE ATTORNEY SERVICE, INC. - e filing, - 02/09/26.	\$624.70
02/24/26	JRBL	ACE ATTORNEY SERVICE, INC. - e filing - 02/24/26.	\$768.10
			\$1,398.80

**Shipping Charges**

Date	Initials	Description	Amount
02/28/26	WD	Federal Express Invoice: 918337588; Tracking: 398605204990; Sender: Wendy Delvalle; Recipient: Clerk of the Supr Court County of Alameda Administration Building OAKLAND CA 94612 US; Comment: outgoing mail. Federal Express Invoice: 920012229; Tracking: 399149190112; Sender: David Goroff; Recipient: David Goroff 1822 WALNUT AVE WILMETTE IL 60091 US.	\$141.94

Federal Express Invoice: 918337588; Tracking: 398605090839; Sender: Wendy Delvalle; Recipient: Hon S Raj Chatterjee Alameda County Supr Ct, Dept Administration Building OAKLAND CA 94612 US; Comment: outgoing mail.

**Transportation / Travel Expenses**

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Amount</b>
02/27/26	JRBL	Airfare--VENDOR: Jeff Blease - attend state court hearing and trial prep - BostonSF - 12/31/25-03/06/26.	\$891.80
02/28/26	LFG	Airfare--VENDOR: Lisa F. Glahn - attending state court hearing/trial prep - SF/Boston - 12/31/25-03/06/26.	\$358.40
02/28/26	LFG	Airfare--VENDOR: Lisa F. Glahn - attending state court hearing/trial prep - SF/Boston - 12/31/25-03/06/26.	\$754.20
			\$2,004.40
		Expense Total:	\$23,877.66