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*Counsel for the Official Committee of Unsecured Creditors*

**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

**MONTHLY PROFESSIONAL FEE  
 STATEMENT FOR BURNS BAIR LLP  
 [JUNE 2024]**

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



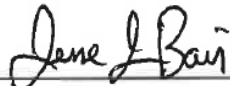
1           **NOTICE IS HEREBY GIVEN** that Burns Bair LLP (“**Burns Bair**”), special insurance  
2 counsel to The Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman  
3 Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement  
4 for the Period of June 1, 2024 through June 30, 2024 (the “**Monthly Fee Statement**”). Pursuant  
5 to the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses  
6 of Professionals [Dkt. 170] (the “**Interim Fee Order**”)<sup>1</sup> entered by the Court on June 23, 2023,  
7 the total legal fees and costs expended by Burns Bair on account of the Committee is as follows:

8 <b>Period</b>	<b>Fees</b>	<b>Expenses</b>	<b>Total</b>
9           June 1, 2024 through June 30, 2024	\$96,391.00	\$3,436.82	\$99,827.82
10           Net Total Allowed Payments this Statement 11           Period: (80% of Fees and 100% of Costs)	\$77,112.80	\$3,436.82	\$80,549.62

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

21  
22 Dated: July 30, 2024

**BURNS BAIR LLP**

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

27  
28 <sup>1</sup> Capitalized terms not otherwise defined shall have the meaning ascribed to them in the Interim Fee Order.

# EXHIBIT A

# Burns | Bair

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

**The Roman Catholic Bishop of Oakland UCC**

**Issue Date :** 7/29/2024

**Bill # :** 01488

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/27/2024	Jesse Bair	Participate in state court counsel meeting re revised case insurance strategy (1.7);	1.70	\$1,530.00
6/27/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes, including presentation of PowerPoint re revised case insurance strategy (1.7);	1.70	\$1,904.00
<b>Totals for Committee Meetings</b>			<b>3.40</b>	<b>\$3,434.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/4/2024	Jesse Bair	Correspond with B. Horn-Edwards re revised exhibit to Burns Bair interim fee application (.1);	0.10	\$90.00
6/4/2024	Brenda Horn-Edwards	Revise exhibit to interim fee application (.1); correspond with J. Bair re same (.1);	0.20	\$68.00
6/6/2024	Jesse Bair	Correspond with B. Horn-Edwards and G. Albert re next round of interim professional fee applications (.1);	0.10	\$90.00
6/7/2024	Jesse Bair	Review and edit J. Bair declaration in support of Burns Bair interim fee application (.2);	0.20	\$180.00
6/7/2024	Jesse Bair	Review and edit Burns Bair interim fee application and accompanying exhibits (1.3);	1.30	\$1,170.00
6/7/2024	Brenda Horn-Edwards	Revise Burns Bair interim fee application (.2); correspond with J. Bair re same (.1);	0.30	\$102.00

6/7/2024	Jesse Bair	Review and respond to correspondence with G. Albert re Burns Bair interim fee application and omnibus hearing re all interim applications (.2);	0.20	\$180.00
6/9/2024	Jesse Bair	Draft Burns Bair interim budget (.4); correspond with Committee and state court counsel re same (.1);	0.50	\$450.00
6/11/2024	Jesse Bair	Revise and edit J. Bair declaration in support of Burns Bair's interim fee application (.1);	0.10	\$90.00
6/13/2024	Karen Dempksi	Docket and calendar interim fee hearing (.1);	0.10	\$34.00
6/17/2024	Brenda Horn-Edwards	Generate LEDES data for fee examiner and email to G. Albert (.1);	0.10	\$34.00
6/17/2024	Jesse Bair	Review and respond to correspondence with G. Albert and B. Horn-Edwards re LEDES information requested by the fee examiner (.1);	0.10	\$90.00
6/27/2024	Jesse Bair	Review Burns Bair monthly invoice for privilege and confidential information (.6);	0.60	\$540.00
6/27/2024	Jesse Bair	Correspond with B. Horn-Edwards re Burns Bair monthly fee statement (.1);	0.10	\$90.00
6/28/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
6/28/2024	Jesse Bair	Review and edit Burns Bair monthly fee statement (.1); correspond with G. Albert re same (.1);	0.20	\$180.00
<b>Totals for Fee Applications</b>			<b>4.50</b>	<b>\$3,490.00</b>

### Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/1/2024	Timothy Burns	Review and respond to correspondence from the mediator re September mediation session (.1);	0.10	\$112.00
6/1/2024	Jesse Bair	Review correspondence with the mediator re September mediation session issues (.1);	0.10	\$90.00
6/1/2024	Jesse Bair	Participate in call with T. Burns re revised insurance mediation strategy (.3);	0.30	\$270.00
6/1/2024	Timothy Burns	Participate in call with J. Bair re insurance strategy (.3);	0.30	\$336.00
6/1/2024	Timothy Burns	Draft internal insurance strategy memo (.8);	0.80	\$896.00
6/3/2024	Nathan Kuenzi	Participate in BB team meeting re case developments and insurance projects (.1);	0.10	\$55.00
6/3/2024	Timothy Burns	Participate in call with state court counsel and J. Bair re case developments and insurance mediation strategy (.5);	0.50	\$560.00
6/3/2024	Nathan Kuenzi	Draft insurance demand letter template for use with all carriers (2.8);	2.80	\$1,540.00

6/3/2024	Nathan Kuenzi	Participate in discussion with T. Burns regarding insurance demand letter project (.2);	0.20	\$110.00
6/3/2024	Jesse Bair	Participate in call with state court counsel and T. Burns re insurance mediation strategy (.5);	0.50	\$450.00
6/3/2024	Timothy Burns	Meet with internal BB team re case assignments and developments (.1);	0.10	\$112.00
6/3/2024	Jesse Bair	Correspond with T. Burns re insurance demand letters (.1);	0.10	\$90.00
6/3/2024	Timothy Burns	Correspond with J. Bair re insurance demand letter project and strategy (.1); meet with N. Kuenzi re assignments in connection with same (.2);	0.30	\$336.00
6/3/2024	Jesse Bair	Participate in BB team conference re case developments and ongoing insurance projects (.1);	0.10	\$90.00
6/3/2024	Nathan Kuenzi	Analyze insurer exposures in connection with preparing insurance aggregate settlement demands (1.2);	1.20	\$660.00
6/4/2024	Jesse Bair	Review and respond to correspondence with T. Burns re suggested changes to Committee insurance demand letter (.2);	0.20	\$180.00
6/4/2024	Timothy Burns	Review and edit PowerPoint presentation re revised Committee insurance strategy (.9);	0.90	\$1,008.00
6/4/2024	Nathan Kuenzi	Analysis re recent California sexual abuse verdicts in connection with insurance demand letter project (1.1);	1.10	\$605.00
6/4/2024	Nathan Kuenzi	Draft PowerPoint presentation re revised Committee insurance strategy (.9);	0.90	\$495.00
6/4/2024	Timothy Burns	Participate in conference with N. Kuenzi re aggregate insurance demand letter project (.2); participate in additional conference with N. Kuenzi re Committee insurance PowerPoint presentation (.2);	0.40	\$448.00
6/4/2024	Nathan Kuenzi	Participate in conference with T. Burns re preparing PowerPoint presentation re Committee insurance strategy (.2);	0.20	\$110.00
6/4/2024	Timothy Burns	Draft outline of presentation re revised Committee insurance strategy (.6);	0.60	\$672.00
6/4/2024	Timothy Burns	Review and edit revised version of aggregate insurance demand letter template (.7);	0.70	\$784.00
6/4/2024	Jesse Bair	Revise and edit draft Committee insurance demand letter (.7);	0.70	\$630.00
6/4/2024	Nathan Kuenzi	Participate in additional conference with T. Burns re preparing aggregate insurance demand letters (.2);	0.20	\$110.00

6/4/2024	Nathan Kuenzi	Draft revisions to PowerPoint presentation re revised Committee insurance strategy, incorporating suggested edits from T. Burns (.7);	0.70	\$385.00
6/4/2024	Timothy Burns	Review and revise draft aggregate insurance demand letter template (1.1);	1.10	\$1,232.00
6/4/2024	Nathan Kuenzi	Draft revisions to aggregate demand letter template, including incorporation of suggested partner edits (1.6);	1.60	\$880.00
6/4/2024	Timothy Burns	Review the Debtor's demand letters (.2);	0.20	\$224.00
6/4/2024	Timothy Burns	Review and respond to correspondence with J. Bair re suggested edits to the Committee's aggregate insurance demand letter (.2); correspond with N. Kuenzi re same (.1);	0.30	\$336.00
6/5/2024	Timothy Burns	Prepare for conference with Lowenstein, state court counsel, and J. Bair re revised case insurance strategy (.1); participate in conference with Lowenstein, state court counsel, and J. Bair re same (.5);	0.60	\$672.00
6/5/2024	Timothy Burns	Continue reviewing and revising draft PowerPoint presentation re Committee insurance and mediation strategy (.8);	0.80	\$896.00
6/5/2024	Jesse Bair	Participate in conference with Lowenstein, state court counsel, and T. Burns re revised case insurance and mediation strategy (.5);	0.50	\$450.00
6/5/2024	Timothy Burns	Participate in conference with J. Bair re case insurance strategy and revisions to aggregate insurance demand letter and PowerPoint presentation (.1); meet with N. Kuenzi re same (.1);	0.20	\$224.00
6/5/2024	Timothy Burns	Continue reviewing and revising draft aggregate insurance demand letter template (.6);	0.60	\$672.00
6/5/2024	Jesse Bair	Participate in portion of additional conference with Lowenstein, state court counsel, and T. Burns re revised insurance mediation strategy (.9);	0.90	\$810.00
6/5/2024	Nathan Kuenzi	Draft revised version of aggregate insurance demand letter template to incorporate additional suggested changes from T. Burns (.4);	0.40	\$220.00
6/5/2024	Timothy Burns	Participate in additional conference with Lowenstein, state court counsel, and J. Bair re case insurance strategy, insurance demand letters, and overall case insurance strategy (1.4);	1.40	\$1,568.00

6/5/2024	Jesse Bair	Review correspondence with B. Wiesenberg re upcoming insurance mediation session (.1); participate in call with T. Burns re mediation developments (.2);	0.30	\$270.00
6/5/2024	Jesse Bair	Review and edit PowerPoint presentation re revised Committee insurance strategy (.4);	0.40	\$360.00
6/5/2024	Jesse Bair	Review and edit revised version of the Committee's draft insurance demand letter (.2); participate in conference with T. Burns re same and presentation re revised Committee insurance strategy (.1);	0.30	\$270.00
6/5/2024	Timothy Burns	Participate in call with J. Bair re mediation developments (.2);	0.20	\$224.00
6/5/2024	Nathan Kuenzi	Participate in conference with T. Burns re revisions to the aggregate insurance demand letters and insurance strategy PowerPoint presentation (.1);	0.10	\$55.00
6/6/2024	Jesse Bair	Participate in conference with state court counsel, Lowenstein, and T. Burns re revised case insurance and mediation strategy (.9);	0.90	\$810.00
6/6/2024	Timothy Burns	Review correspondence with state court counsel re upcoming Committee meetings (.2);	0.20	\$224.00
6/6/2024	Timothy Burns	Prepare for case insurance and mediation strategy meeting (.1); participate in conference with state court counsel, Lowenstein, and J. Bair re insurance strategy and mediation issues (.9);	1.00	\$1,120.00
6/7/2024	Timothy Burns	Review and respond to B. Weisenberg correspondence re upcoming hearing in the insurance adversary proceeding (.1);	0.10	\$112.00
6/8/2024	Timothy Burns	Review and respond to correspondence with mediator re mediation issues and upcoming session (.2);	0.20	\$224.00
6/8/2024	Timothy Burns	Participate in call with mediator re various case issues and ongoing negotiations (.5);	0.50	\$560.00
6/9/2024	Timothy Burns	Review mediation order (.2); correspond with N. Kuenzi and J. Bair re same (.2); participate in call with state court counsel re same (.1);	0.50	\$560.00
6/9/2024	Jesse Bair	Review various correspondence with Lowenstein and T. Burns re revised insurance case strategy and upcoming insurance hearings (.2);	0.20	\$180.00
6/10/2024	Timothy Burns	Participate in conference with J. Bair re insurance mediation issues (.1);	0.10	\$112.00
6/10/2024	Timothy Burns	Review N. Kuenzi's memo re mediation order issues (.2);	0.20	\$224.00



6/10/2024	Jesse Bair	Participate in conference with T. Burns re upcoming insurance mediation sessions (.1);	0.10	\$90.00
6/11/2024	Timothy Burns	Participate in call with state court counsel and J. Bair re upcoming insurance meeting with the debtor (.2); prepare for and call to A. Uetz re same (.2);	0.40	\$448.00
6/11/2024	Jesse Bair	Participate in call with state court counsel and T. Burns re upcoming meeting with the debtor re case insurance issues (.2);	0.20	\$180.00
6/12/2024	Timothy Burns	Review and respond to correspondence with B. Weisenberg and state court counsel re upcoming mediation (.1); review and respond to additional correspondence with B. Weisenberg re mediation and related issues (.1); review and respond to correspondence with the Debtor and Lowenstein re mediation and insurance issues call (.2);	0.40	\$448.00
6/12/2024	Jesse Bair	Review correspondence with B. Wiesenberg and the debtor re upcoming insurance meeting (.1);	0.10	\$90.00
6/13/2024	Jesse Bair	Participate in call with Lowenstein, state court counsel, and T. Burns re preparations for upcoming debtor insurance meeting and overall Committee insurance strategy (.8);	0.80	\$720.00
6/13/2024	Jesse Bair	Participate in meeting with the debtor re various case insurance issues (.6); participate in post-meeting conference with T. Burns re outcome of meeting and next-steps (.1);	0.70	\$630.00
6/13/2024	Timothy Burns	Participate in additional call with state court counsel re mediation related meeting and insurance strategy (.2);	0.20	\$224.00
6/13/2024	Timothy Burns	Participate in meeting with the debtor re various case insurance issues (.6); participate in post-meeting conference with J. Bair re outcome of meeting and next-steps (.1);	0.70	\$784.00
6/13/2024	Timothy Burns	Participate in call with committee professionals and state court counsel re preparations for upcoming insurance meeting the debtor, mediation issues, and overall Committee insurance strategy (.8);	0.80	\$896.00
6/13/2024	Timothy Burns	Prepare for meeting with the debtor re various case insurance issues (.8);	0.80	\$896.00
6/14/2024	Timothy Burns	Prepare for additional meeting with the debtor re case insurance issues (.2); participate in additional meeting with the debtor and Committee professionals re case insurance issues (.3);	0.50	\$560.00

6/14/2024	Nathan Kuenzi	Analyze revisions to the aggregate insurance demand letter template (.3);	0.30	\$165.00
6/14/2024	Jesse Bair	Participate in conference with T. Burns re ongoing case insurance projects needed for completion in connection with upcoming mediation session (.1);	0.10	\$90.00
6/14/2024	Jesse Bair	Provide instructions to B. Cawley and N. Kuenzi re preparing Committee demand letters to each insurer (.2);	0.20	\$180.00
6/14/2024	Timothy Burns	Participate in conference with J. Bair re insurance projects needed for completion in connection with upcoming mediation session (.1);	0.10	\$112.00
6/14/2024	Jesse Bair	Participate in additional meeting with the debtor and Committee professionals re case insurance issues (.3);	0.30	\$270.00
6/14/2024	Jesse Bair	Analyze insurer exposure assessments in connection with preparing Committee demand letters to each insurer (.5);	0.50	\$450.00
6/17/2024	Timothy Burns	Review K. Jonch-Clausen's cooperation clause research memo (.2);	0.20	\$224.00
6/17/2024	Timothy Burns	Review and respond to internal BB correspondence re insurance demand letters (.1); participate in call with the debtor re insurance issues re upcoming mediation session (.2);	0.30	\$336.00
6/17/2024	Jesse Bair	Review and respond to correspondence with T. Burns and K. Jonch-Clausen re follow-up analysis needed in connection with memo re declaratory judgment causes of action after insurer denial of reasonable settlement offers (.2);	0.20	\$180.00
6/17/2024	Timothy Burns	Review K. Jonch-Clausen's memo re ability to bring an immediate declaratory judgment claim following an insurers' refusal to accept reasonable settlement demands (.4); correspond with K. Jonch-Clausen re revisions needed to same (.1);	0.50	\$560.00
6/17/2024	Brian Cawley	Begin drafting individualized insurance demand letters to each insurer, including computation of detailed claim count for each demand letter (3.7);	3.70	\$2,035.00
6/18/2024	Brian Cawley	Continue drafting individualized insurance demand letters to each insurer (1.3);	1.30	\$715.00
6/18/2024	Brian Cawley	Analyze claimant information and create spreadsheet providing updated claim counts for each carrier (5.8);	5.80	\$3,190.00
6/18/2024	Timothy Burns	Participate in full-day mediation session for insurance purposes (8.7);	8.70	\$9,744.00
6/18/2024	Jesse Bair	Participate in full-day mediation session re case insurance issues (8.7);	8.70	\$7,830.00

6/19/2024	Jesse Bair	Analyze potential discrepancies between debtor and Committee carrier claim counts and provide instructions to B. Cawley re supplemental analysis needed in connection with same (.7);	0.70	\$630.00
6/19/2024	Jesse Bair	Review draft Committee demand letters on the insurers and re-review prior demands made by the debtor (.5);	0.50	\$450.00
6/19/2024	Brian Cawley	Analyze and compare debtor insurance demand letters and Committee draft demand letters to identify and reconcile potential discrepancies with individual carrier claim count lists (6.8);	6.80	\$3,740.00
6/19/2024	Brian Cawley	Draft email memo to J. Bair summarizing demand letter claim count discrepancy analysis (.3);	0.30	\$165.00
6/20/2024	Brian Cawley	Supplemental analysis to resolve duplicates and other discrepancies between debtor and Committee carrier claim count lists (2.1);	2.10	\$1,155.00
6/20/2024	Jesse Bair	Review and respond to correspondence with state court counsel, Lowenstein, and G. Albert re upcoming hearings re the insurers' motion to dismiss and case management conference in the insurance district court action (.2);	0.20	\$180.00
6/20/2024	Jesse Bair	Review B. Cawley's revised chart re discrepancies between debtor and Committee carrier claim counts (.1);	0.10	\$90.00
6/21/2024	Timothy Burns	Prepare additional slides for insurance strategy PowerPoint presentation (.8);	0.80	\$896.00
6/21/2024	Jesse Bair	Participate in call with state court counsel re revised insurance strategy and case next-steps (.3);	0.30	\$270.00
6/22/2024	Jesse Bair	Correspond with state court counsel re upcoming motion to dismiss and insurance case status hearing in the district court insurance action (.1);	0.10	\$90.00
6/22/2024	Jesse Bair	Review correspondence with B. Wiesenberg and T. Burns re presentation re revised insurance strategy at upcoming state court counsel and Committee meetings (.1);	0.10	\$90.00
6/22/2024	Timothy Burns	Review and respond to correspondence with B. Weisenberg re insurance presentations for upcoming Committee and state court counsel meetings (.2);	0.20	\$224.00
6/24/2024	Nathan Kuenzi	Participate in conference with T. Burns re recent California Supreme Court decision on continuing injury and research project in connection with same (.3);	0.30	\$165.00

6/24/2024	Nathan Kuenzi	Participate in conference with J. Bair re revising Committee insurance demand letters (.1);	0.10	\$55.00
6/24/2024	Karin Jonch-Clausen	Supplemental legal research in connection with revising memo re ability to bring an immediate declaratory judgment claim following an insurers' refusal to accept reasonable settlement demands (3.2);	3.20	\$1,760.00
6/24/2024	Timothy Burns	Review California Supreme Court decision on continuing injury (.6); confer with N. Kuenzi re same and associated research project (.3); participate in call with state court counsel re same (.1);	1.00	\$1,120.00
6/24/2024	Jesse Bair	Provide instructions to K. Jonch-Clausen re follow-up research needed in connection with research memo re declaratory judgment counts based on insurer refusals to fund reasonable settlement demands (.1);	0.10	\$90.00
6/24/2024	Jesse Bair	Provide instructions to N. Kuenzi re revising Committee insurance demand letters (.1);	0.10	\$90.00
6/25/2024	Timothy Burns	Review and reply with further research assignment to N. Kuenzi's research memo re continuing injury issue (.4);	0.40	\$448.00
6/25/2024	Timothy Burns	Participate in call with B. Weisenberg and J. Prol re mediation strategy issues (.6);	0.60	\$672.00
6/25/2024	Nathan Kuenzi	Analyze continuous trigger theory and potential applicability to sexual abuse claims, including review of recent California Supreme Court decision in Truck Ins. Exch. v. Kaiser Cement and Gypsum Corp (2.5); draft email memo summarizing same (.7);	3.20	\$1,760.00
6/25/2024	Nathan Kuenzi	Supplemental analysis re continuous trigger theory and potential applicability to sexual abuse claims in light of T. Burns questions (.9); draft email memo summarizing supplemental research (.6);	1.50	\$825.00
6/25/2024	Karin Jonch-Clausen	Draft revised version of memo re ability to bring an immediate declaratory judgment claim following an insurers' refusal to accept reasonable settlement demands in light of comments from T. Burns and J. Bair (3.1);	3.10	\$1,705.00
6/25/2024	Jesse Bair	Review N. Kuenzi email memo re continuous trigger theory and potential applicability to sexual abuse claims (.2); participate in conference with N. Kuenzi re same (.1);	0.30	\$270.00
6/25/2024	Timothy Burns	Review and respond to correspondence with the Debtor re mediation and insurance issues (.2);	0.20	\$224.00

6/26/2024	Jesse Bair	Provide instructions and answer N. Kuenzi questions re additional analysis and revisions needed to the Committee's insurance demand letters and carrier claim count appendices (.4); follow-up correspondence with N. Kuenzi re same (.1);	0.50	\$450.00
6/26/2024	Jesse Bair	Prepare for call with the debtor re various case insurance issues (.2); participate in call with the debtor and T. Burns re same (.4);	0.60	\$540.00
6/26/2024	Timothy Burns	Participate in call with state court counsel re case insurance strategy (.8); review and respond to related correspondence (.1);	0.90	\$1,008.00
6/26/2024	Karin Jonch-Clausen	Research breach of the covenant of good faith and fair dealing and declaratory relief in connection with same (1.6);	1.60	\$880.00
6/26/2024	Karin Jonch-Clausen	Finish drafting revised version of memo re ability to bring an immediate declaratory judgment claim following an insurers' refusal to accept reasonable settlement demands (1.8);	1.80	\$990.00
6/26/2024	Timothy Burns	Prepare for call with the debtor re various case insurance issues (.3);	0.30	\$336.00
6/26/2024	Nathan Kuenzi	Participate in conferences with J. Bair re analysis and revisions needed to the Committee's insurance demand letters and carrier claim count appendices (.4);	0.40	\$220.00
6/26/2024	Nathan Kuenzi	Draft revised demand letters to each insurer, including revised Appendix A for each letter reflecting updated carrier claim counts (2.3);	2.30	\$1,265.00
6/26/2024	Timothy Burns	Participate in meeting with the debtor and J. Bair re various case insurance issues (.4);	0.40	\$448.00
6/27/2024	Timothy Burns	Prepare for state court counsel meeting re revised insurance strategy (.5); review J. Bair's suggested edits to PowerPoint presentation re same (.2);	0.70	\$784.00
6/27/2024	Timothy Burns	Participate in additional call with state court counsel re insurance strategy issues (.2); meet with J. Bair re same (.2);	0.40	\$448.00
6/27/2024	Timothy Burns	Prepare draft correspondence to the mediators re proposed individual meetings with the insurers and circulate to Committee professionals (.5);	0.50	\$560.00
6/27/2024	Jesse Bair	Prepare for state court counsel meeting re revised insurance strategy, including reviewing and editing insurance presentation in connection with same (.4); participate in conference with T. Burns re insurance strategy issues (.2);	0.60	\$540.00

6/27/2024	Nathan Kuenzi	Continue drafting revised demand letters to each insurer, including revised Appendix A for each letter reflecting updated carrier claim counts (3.3);	3.30	\$1,815.00
6/28/2024	Timothy Burns	Review and respond to B. Weisenberg email re draft correspondence to the mediators re individual insurer mediation sessions (.1); correspond with N. Kuenzi re same (.1);	0.20	\$224.00
6/28/2024	Jesse Bair	Review various correspondence with state court counsel re revised insurance strategy (.2);	0.20	\$180.00
6/28/2024	Nathan Kuenzi	Continue analysis of claimant allegations as applied to insurance company policy periods to inform revised version of Appendix A for insurance demand letters (2.3);	2.30	\$1,265.00
6/28/2024	Karin Jonch-Clausen	Research re bad-faith refusal to settle jury instructions in California (1.0);	1.00	\$550.00
6/28/2024	Jesse Bair	Review various correspondence with the mediators, T. Burns, and Lowenstein re individual mediation meetings with the insurers (.2);	0.20	\$180.00
6/28/2024	Nathan Kuenzi	Draft revised demand letters to U.S. Fire, Chubb, AIG, CNA, Employers Mutual, Travelers, and LMI (2.2);	2.20	\$1,210.00
6/28/2024	Jesse Bair	Brief review re N. Kuenzi research memo re aggregate insurance demand letters (.1);	0.10	\$90.00
6/28/2024	Karin Jonch-Clausen	Draft email to T. Burns summarizing research re bad-faith refusal to settle jury instructions in California (.2);	0.20	\$110.00
6/30/2024	Nathan Kuenzi	Supplemental analysis re claimant allegations as applied to insurance company policy periods to inform revised version of Appendix A for insurance demand letters (1.0);	1.00	\$550.00
6/30/2024	Nathan Kuenzi	Continue drafting revised demand letters to U.S. Fire, Chubb, AIG, CNA, Employers Mutual, Travelers, and LMI (1.8);	1.80	\$990.00
<b>Totals for Insurance Recovery Activities</b>			<b>114.30</b>	<b>\$89,467.00</b>

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<b>Total Hours and Fees</b>	<b>122.20</b>	<b>\$96,391.00</b>
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**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/17/2024	Delta Airlines, J. Bair (MSN-SFO, June 17-19)	\$1,055.95
06/17/2024	Delta Airlines, T. Burns (MSN-SFO, June 17)	\$528.00

06/17/2024	Hotel, T. Burns (2 nights)	\$647.10
06/17/2024	Hotel, J. Bair (2 nights)	\$647.10
06/19/2024	Airport parking, J. Bair	\$30.00
06/19/2024	Uber, J. Bair (hotel to airport)	\$78.38
06/19/2024	Travel meal, T. Burns	\$42.85
06/19/2024	Travel meal, T. Burns	\$8.69
06/20/2024	United Airlines, T. Burns (SFO-MSN, June 20)	\$398.75
<b>Total Expenses</b>		<b>\$3,436.82</b>

**Timekeeper Summary**

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	0.90	\$340.00	\$306.00
Brian Cawley	Associate	20.00	\$550.00	\$11,000.00
Jesse Bair	Partner	27.30	\$900.00	\$24,570.00
Karen Dempksi	Paralegal	0.10	\$340.00	\$34.00
Karin Jonch-Clausen	Associate	10.90	\$550.00	\$5,995.00
Nathan Kuenzi	Associate	28.20	\$550.00	\$15,510.00
Timothy Burns	Partner	34.80	\$1,120.00	\$38,976.00

**Total Due This Invoice: \$99,827.82**