

FOLEY & LARDNER LLP

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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

**FOURTEENTH 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 JULY 1, 2024 THROUGH JULY
31, 2024;**

Judge: Hon. William J. Lafferty

**Objection Deadline: September 9, 2024
4:00 p.m. (Pacific Time)**

[No Hearing Requested]

Name of Applicant:	Foley & Lardner LLP
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:	July 1, 2024 – July 31, 2024
Amount of Compensation Sought as Actual, Reasonable and Necessary: ¹	\$482,778.50
20% Holdback:	\$96,555.70
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: ²	\$7,895.75
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought:	\$394,118.55

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”)³ 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 or examiner 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

¹ 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.

² 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.

³ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Order.

1 Court approved the Retention Application on June 15, 2023, entering the *Order Approving Debtor's*
2 *Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§*
3 *327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Dkt.
4 No. 145] (the "Foley Retention Order").

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

7 On May 26, 2023, the Debtor filed the *Debtor's Motion for an Order Establishing Procedures for*
8 *Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 70] (the
9 "Compensation Procedures Motion"). The Court granted the Compensation Procedures Motion on June
10 23, 2023, entering the *Order Authorizing Procedures for Interim Compensation and Reimbursement of*
11 *Expenses of Professionals* [Dkt. No. 170] (the "Compensation Procedures Order").

12 Foley & Lardner LLP ("Foley" or "Applicant"), as general bankruptcy counsel to the Debtor,
13 hereby submits its fourteenth monthly fee statement (the "Monthly Fee Statement") for allowance of
14 payment of compensation for professional services rendered and for reimbursement of actual and
15 necessary expenses incurred for the period commencing July 1, 2024 through and including July 31, 2024
16 (the "Fee Period") pursuant to the Compensation Procedures Order.

17 By this Monthly Fee Statement, Foley seeks (i) a monthly interim allowance of compensation in
18 the amount of \$482,778.50 and actual and necessary expenses in the amount of \$7,895.75 for a total
19 allowance of \$490,674.25 and (ii) payment of \$386,222.80 (80% of the allowed fees pursuant to the
20 Compensation Procedures Order) and reimbursement of \$7,895.75 (100% of the allowed expenses
21 pursuant to the Compensation Procedures Order) for a total payment of \$394,118.55 for the Fee Period.

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

23 Attached as Exhibit 1 is the name of each of Foley's professionals and paraprofessionals who
24 performed services for the Debtor in connection with this Chapter 11 Case during the Fee Period covered
25 by this Monthly Fee Statement and the hourly rate and total fees for each professional during the Fee
26 Period.

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

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

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

5 **NOTICE AND OBJECTION PROCEDURES**

6 In accordance with the Compensation Procedures Order, each Notice Party shall have until the
7 tenth (10th) day (or the next business day if such day is not a business day) following service of this
8 Monthly Fee Statement (the “Objection Deadline”) to serve an objection to the Monthly Fee Statement on
9 Foley and each of the other Notice Parties.

10 Upon the expiration of the Objection Deadline, the Applicant shall file a certificate of no objection
11 with the Court, after which the Debtor is authorized and directed to pay the Applicant an amount equal to
12 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement.

13 If an objection is properly filed, the Debtor shall be authorized and directed to pay the Applicant
14 80% of the fees and 100% of the expenses not subject to an objection.

15 DATED: August 30, 2024

16 **FOLEY & LARDNER LLP**

17 Jeffrey R. Blease
18 Thomas F. Carlucci
19 Shane J. Moses
20 Emil P. Khatchatourian
21 Ann Marie Uetz
22 Matthew D. Lee

23 /s/ Shane J. Moses

24 SHANE J. MOSES

25 *Counsel for the Debtor*
26 *and Debtor in Possession*

EXHIBIT 1

**Compensation by Professional
July 1, 2024 – July 31, 2024**

Name of Professional Individual	Initials	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Elizabeth P. Mazzocco	EPM	Associate, 2014	\$750	80.00	\$60,000.00
Joseph S. Harper	JSH	Associate, 2016	\$700	11.40	\$7,980.00
Mason Roberts	MR	Associate, 2018	\$690	16.80	\$11,592.00
Mary Rofaeil	MRL	Associate, 2021	\$570	24.20	\$13,794.00
Mikaela R. Mitcham	MRM	Associate, 2021	\$570	6.00	\$3,420.00
Shane J. Moses	SJM	Of Counsel, 2005	\$750	87.00	\$65,250.00
Janelle C. Harrison	JCH	Paralegal, N/A	\$300	19.20	\$5,760.00
Kerry A. Farrar	KAFA	Paralegal, N/A	\$395	13.50	\$5,332.50
Ann Marie Uetz	AMUE	Partner, 1993	\$925	85.00	\$78,625.00
Eileen R. Ridley	ERR	Partner, 1990	\$975	33.10	\$32,272.50
Emil P. Khatchatourian	EPK	Partner, 2009	\$800	21.40	\$17,120.00
Heidi M. Furlong	HMF	Partner, 2001	\$1,000	4.20	\$4,200.00
Jason J. Kohout	JJK	Partner, 2007	\$875	1.50	\$1,312.50
Jonathan P. Witt	JPWI	Partner, 2009	\$800	4.70	\$3,760.00
Jeffrey R. Blease	JRBL	Partner, 1988	\$1,275	5.00	\$6,375.00
Mark C. Moore	MCM	Partner, 2010	\$825	95.20	\$78,540.00
Matthew D. Lee	MDL	Partner, 2006	\$800	46.60	\$37,280.00
Mark T. Schieble	MTSC	Partner, 1980	\$1,150	3.70	\$4,255.00
Thomas F. Carlucci	TFCA	Partner, 1987	\$1,325	3.30	\$4,372.50
Robert T. Stewart	RTST	Senior Counsel, 2014	\$740	1.60	\$1,184.00
Daniyal M. Habib	DMH	Special Counsel, 2017	\$475	73.00	\$34,675.00
Tamar N. Dolcourt	TND	Special Counsel, 2009	\$735	7.50	\$5,512.50
Kevin T. Lewman	KTLE	Technical Specialist	\$415	0.40	\$166.00
TOTAL				644.30	\$482,778.50

EXHIBIT 2

**Compensation by Category
July 1, 2024 – July 31, 2024**

Category	Hours Billed this Fee Period	Total for Fee Statement
003 – Automatic Stay	3.00	\$2,380.00
005 – Bar Date Motion/ Claims Reconciliation Issues	13.30	\$10,535.00
006 – Case Administration (Docket Updates, WIP and calendar)	17.60	\$7,393.00
007 – Chapter 11 Plan/ Plan Confirmation	54.80	\$41,414.50
008 – Communications with Client	22.10	\$19,025.00
009 – Corporate Governance and Board Issues	0.50	\$400.00
011 – Cash Management	13.40	\$11,680.00
013 – Employee Issues	1.40	\$980.00
014 - Exclusivity	16.30	\$12,467.50
016 – General Case Strategy (includes calls with client and team calls)	28.50	\$24,622.50
017 – Hearings and Court Matters	18.10	\$15,730.00
018 – Non-Bankruptcy Litigation	9.00	\$6,980.00
020 – Retention/Billing/Fee Applications for Debtor Professionals	21.50	\$16,212.50
021 – Retention/ Fee Applications: Ordinary Course Professionals	9.40	\$6,969.00
022 – Retention/ Fee Applications: Other Professionals	0.80	\$598.50
024 – Tax Issues	4.10	\$4,421.00
025- U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Reports	2.90	\$2,130.00
026 – Unsecured Creditors Issues/Communications/Meetings	10.10	\$8,512.50
027 – Real Estate and Real Property Issues	11.00	\$11,333.00
028 – Tort Claims	20.70	\$17,093.50
030 – Insurance Issues (other than coverage)	27.80	\$19,680.00
031 – Insurance Issues (coverage, includes adversary proceeding)	244.00	\$171,233.00
032 – Rule 2004 Motions/Discovery/Subpoenas	27.50	\$16,178.50
034 – Other Motion Practice	5.90	\$4,175.00
037 – Financing	10.70	\$9,400.00
038 – Mediation	49.90	\$41,234.50
TOTAL	644.30	\$482,778.50

EXHIBIT 3

**Expense by Category
July 1, 2024 – July 31, 2024**

Costs/Expense	Amount Billed
Electronic Legal Research Services	\$417.70
LSS – eDiscovery Services	\$3,700.00
Meals	\$1,432.58
Recording / Filing Fees	\$16.00
Shipping Charges	\$35.36
Shipping/courier/messenger services	\$217.50
Transportation /Travel Expenses	\$2,076.61
TOTAL	\$7,895.75

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EXHIBIT 4

**Time Detail Entries
July 1, 2024 – July 31, 2024**

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FOLEY & LARDNER LLP
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BOSTON, MASSACHUSETTS 02199-7610
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WWW.FOLEY.COM

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

Date: August 30, 2024
Invoice No.: 50905237
Our Ref. No.: 100845-0402

Services through July 31, 2024

Amount due for professional services rendered regarding Chapter 11 Bankruptcy \$482,778.50

Total Expenses: \$7,895.75

Amount Due: \$490,674.25

Please reference your invoice number 50905237 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of this invoice.

Federal Employer Number:
39-0473800

Professional Services Detail

003 Automatic Stay

07/02/24	EPK	Evaluation of automatic stay issues relating to proposed service of process relating to lawsuit against Catholic Youth Organization (.1); confer with S. Moses regarding same (.3); email correspondence with A. Ouellette regarding same (.2).	0.60	\$480.00
07/08/24	EPK	Confer with A. Uetz and J. Blease regarding status of the automatic stay and its effect on state court proceedings.	0.20	\$160.00
07/10/24	EPK	Analyze automatic stay impacts relating to actions pending against RCWC and trials being set against co-defendants (.5); email correspondence with A. Uetz to coordinate with respect to same (.4); coordinate with L. Markarian of Winston & Strawn regarding privileged issues (.3); coordinate with P. Glaessner of AGHW regarding privileged matter and related stay issues (.4); call with plaintiffs' counsel P. Hughes to discuss stayed actions (.2).	1.80	\$1,440.00
07/18/24	SJM	Call with counsel for co-defendant regarding pending state court case against co-defendants.	0.40	\$300.00
		Task Total:	3.00	\$2,380.00

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

07/02/24	MCM	Continue analysis of proofs of claim filed in RCBO bankruptcy case.	0.70	\$577.50
07/05/24	MCM	Review correspondence from insurer counsel regarding master key with survivor claims (.2); analyze issues in connection with same (.4); email correspondence with Foley team regarding next steps (.3).	0.90	\$742.50
07/05/24	MDL	Evaluate issue regarding proof of claim security key raised by O'Melveny Myers.	0.10	\$80.00

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07/08/24	MCM	Email correspondence with KCC/Verita regarding master key issues and related work (.3); conference call regarding same (.3).	0.60	\$495.00
07/08/24	MDL	Email correspondence with A. Wolter (O'Melveny Myers) regarding issue with security key for proofs of claim.	0.10	\$80.00
07/10/24	MCM	Email correspondence with A&M claims-review team regarding amended claims (.4); analyze three amended claims filed on 6/6/2024 (.5); revise survivor claims register provided by KCC/Verita team to formulate new master key for insurance counsel pursuant to Bar Date Order (.5); email correspondence to Foley team regarding update on same (.3); begin incorporation of new claim information into claims matrix and related documents (.3).	2.00	\$1,650.00
07/11/24	JCH	Review 3 proofs of claim and apply redactions to personally identifying information.	0.80	\$240.00
07/11/24	MCM	Work on issues in connection with production of master key to insurers following revision of same by KCC and Foley teams (1.0); continue revisions to claims matrix in connection with amended claims (1.0); revise claims funnel regarding same (.5).	2.50	\$2,062.50
07/11/24	MDL	Evaluate facts surrounding newly-discovered pre-petition claim.	0.20	\$160.00
07/12/24	MDL	Evaluate protocol for producing revised proof of claim security key to insurers.	0.20	\$160.00
07/15/24	MCM	Review email correspondence and attached documentation regarding late-filed claim from KCC in connection with updating claims matrix and related analyses.	0.50	\$412.50
07/15/24	MDL	Evaluate updated proof of claim security key issue.	0.10	\$80.00
07/16/24	MCM	Continue working on claims analysis in light of recent developments and amended claims.	0.70	\$577.50
07/17/24	MCM	Continue working on revised claims-review matrix and funnel in connection with amended claims filed on or about June 6, 2024.	0.70	\$577.50

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07/18/24	MCM	Revise and circulate claims-review matrix and funnel in connection with amended claims filed on or about June 6, 2024.	0.70	\$577.50
07/22/24	MCM	Continue working on defendant analysis for claims-reconciliation purposes.	1.00	\$825.00
07/24/24	MCM	Continue working on defendant analysis for claims-reconciliation purposes.	1.00	\$825.00
07/29/24	MCM	Work on issues in connection with analysis of co-defendants and related entities.	0.50	\$412.50
Task Total:			13.30	\$10,535.00

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

07/01/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
07/01/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.40	\$280.00
07/01/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.50	\$285.00
07/02/24	JCH	Circulate updated Master Case Calendar and Timeline (.2); update daily docket report (.5).	0.70	\$210.00
07/03/24	EPK	Confer with M. Lee and S. Moses regarding potential need for further extension of removal deadline.	0.20	\$160.00
07/03/24	JCH	Update daily docket report.	0.50	\$150.00
07/08/24	EPK	Oversee maintenance of and updates to master case calendar (.1); email correspondence with J. Harper and J. Harrison regarding same (.1).	0.20	\$160.00
07/08/24	JCH	Revise Master Case Calendar and Timeline (.5); prepare and file Notice of Core Service list as of July 8, 2024 (.5); update daily docket report (.5).	1.50	\$450.00
07/08/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.40	\$280.00
07/09/24	JCH	Update daily docket report.	0.50	\$150.00

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07/09/24	MRL	Summarize daily docket activity and upcoming deadlines for client (.4); email correspondence with the Foley team regarding the same (.2).	0.60	\$342.00
07/10/24	JCH	Update daily docket report.	0.50	\$150.00
07/11/24	JCH	Update daily docket report.	0.50	\$150.00
07/12/24	JCH	Update daily docket report (.5); finalize and file Notice of Continued Hearing on interim fee applications (.5).	1.00	\$300.00
07/12/24	MRL	Summarize daily docket activity and upcoming deadlines for client (.7); confer with E. Mazzocco regarding the summary update (.2).	0.90	\$513.00
07/15/24	EPK	Confer with S. Moses regarding potential further extension of the removal deadline and basis for relief.	0.40	\$320.00
07/19/24	SJM	Email to J. Harrison regarding deadline for proof of claim in Franciscan Friars case.	0.20	\$150.00
07/22/24	JCH	Calendar hearing on Debtors' Second Motion to Approve Insurance Premium Finance Agreement (.1); revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.10	\$330.00
07/22/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.50	\$350.00
07/23/24	JCH	Update daily docket report.	0.50	\$150.00
07/23/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.60	\$342.00
07/24/24	JCH	Update daily docket report.	0.50	\$150.00
07/25/24	JCH	Update daily docket report (.5); upload proposed order regarding insurance premium finance agreement (.2).	0.70	\$210.00
07/26/24	JCH	Update daily docket report.	0.50	\$150.00
07/29/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
07/29/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.30	\$210.00
07/30/24	EPK	Brief review of third motion to extend removal deadline and declaration in support of same.	0.20	\$160.00

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Foley & Lardner LLP

August 30, 2024

07/30/24	JCH	Update Timeline and Master Case Calendar (.2) and daily docket report (.5).	0.70	\$210.00
07/31/24	EPK	Brief review of proposed changes to the third motion to extend the removal deadline and supporting declaration.	0.20	\$160.00
07/31/24	JCH	Update daily docket report.	0.50	\$150.00
07/31/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.30	\$171.00
		Task Total:	17.60	\$7,393.00

007 Chapter 11 Plan/ Plan Confirmation

07/01/24	EPK	Long strategy teleconference with M. Lee, M. Moore, and S. Moses regarding non-debtor release issues following the Purdue decision (1.0); analyze key court decisions discussing the propriety of consensual non-debtor releases and plan exculpation (2.1).	3.10	\$2,480.00
07/01/24	EPK	Review analysis of Norwich plan changes (.2); evaluate release issues for RCBO's plan in light of Purdue decision (.3); draft high-level talking points regarding consensual release requirements (.6).	1.10	\$880.00
07/01/24	MCM	Analyze email correspondence with A. Uetz regarding child-protection protocols and non-monetary issues (.4); review Dallas Charter requirements vis-a-vis Diocesan Review Board and related issues (.4); revise child-protection protocols based on same (.7).	1.50	\$1,237.50
07/01/24	MCM	Prepare for conference call with Foley team to discuss Purdue Pharma decision and impact on RCBO bankruptcy (.5); conference call with M. Lee, E. Khatchatourian, and S. Moses (1.0).	1.50	\$1,237.50
07/01/24	MDL	Evaluate alternatives to non-consensual third-party releases as incentives to nondebtor contributions to plan settlements.	0.40	\$320.00
07/01/24	MDL	Strategize regarding effect of Purdue Pharma decision on reorganization plan with M. Moore, S. Moses, and E. Khatchatourian.	1.00	\$800.00

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07/01/24	SJM	Analyze implications of Purdue Pharma decision in light of existing Ninth Circuit law, and review decision in the Ninth Circuit regarding related matters (3.8); meeting with M. Lee, E. Khatchatourian, and M. Moore regarding implications of Purdue decision for plan (.9).	4.70	\$3,525.00
07/02/24	EPK	Draft short summary analyzing structural issues relating to possible non-debtor plan contributions (.2); confer with S. Moses regarding release issues (.1); follow up on developments in the Norwich bankruptcy case relating to release and plan issues (.1).	0.40	\$320.00
07/02/24	MCM	Email correspondence with Foley team regarding Norwich diocese case developments and status conference on same set for 7/3 (.3); continue working on issues related to child-protection protocols (.7).	1.00	\$825.00
07/02/24	MDL	Email exchange with C. Moore (A&M) regarding bankruptcy case and plan fund sources.	0.20	\$160.00
07/02/24	SJM	Prepare summary memo describing plan options for non-debtor releases in light of Purdue decision.	4.70	\$3,525.00
07/03/24	EPK	Review S. Moses's summary of release issues affecting NDCEs (.2); comment on same (.3); email to S. Moses regarding proposed revisions to the summary (.1).	0.60	\$480.00
07/03/24	MCM	Review email correspondence with Foley team regarding follow-up to Purdue Pharma decision (.3); analyze email memorandum regarding same (.5).	0.80	\$660.00
07/03/24	MRL	Listen to the Norwich status hearing regarding the Purdue decision in order to advise possible third-party releases (1.9); confer with M. Moore regarding the outcome of the hearing (.2); draft a summary of the hearing to the Foley team (.6).	2.70	\$1,539.00
07/08/24	MCM	Confer with M. Rofaeil regarding plan developments in Syracuse and Rochester bankruptcy cases (.2); email correspondence with M. Rofaeil and M. Lee regarding same (.2).	0.40	\$330.00
07/08/24	MDL	Revise memorandum for client on impact of Purdue Pharma on bankruptcy plan strategy.	1.60	\$1,280.00

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Foley & Lardner LLP

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07/09/24	MCM	Follow-up work on child-protection protocols, specifically the Guiding Principles, following conversation with Committee counsel regarding same (1.0); work on issues in connection with identity of proposed compliance monitor (.6).	1.60	\$1,320.00
07/10/24	AMUE	Analyze Kaiser decision in consideration of plan confirmation issues.	1.20	\$1,110.00
07/10/24	AMUE	Review privileged issue concerning possible plan confirmation obstacle.	1.20	\$1,110.00
07/10/24	EPK	Review internal memorandum summarizing plan release issues.	0.20	\$160.00
07/10/24	MCM	Strategize regarding potential plan outcomes with Foley team (.6); meeting with M. Mitcham regarding review of compliance monitors or similar individuals from other cases in connection with non-monetary protocols (.4); work on issues with child-protection protocols (.4).	1.40	\$1,155.00
07/10/24	MRM	Conduct research in connection with proposed compliance coordinator.	1.50	\$855.00
07/11/24	MCM	Continue working on guiding principles in proposed child-protection protocols prior to distribution to client parties for review.	1.00	\$825.00
07/11/24	MRL	Listen to the Syracuse status hearing regarding the Purdue decision in order to advise possible third-party releases.	1.10	\$627.00
07/11/24	MRM	Conduct research in connection with proposed compliance coordinator.	1.50	\$855.00
07/12/24	MCM	Review email memorandum from M. Rofaeil regarding case update on Syracuse status conference in connection with pending joint plan (.4); revise pending case status charts in connection with same (.4).	0.80	\$660.00
07/12/24	MRL	Draft a summary of the Syracuse status hearing to the Foley team.	1.00	\$570.00
07/12/24	MRM	Research in connection with Compliance Coordinators in other diocesan matters.	1.00	\$570.00
07/13/24	MRM	Research in connection with compliance coordinator in other diocesan cases.	1.30	\$741.00

ROMAN CATHOLIC BISHOP OF OAKLAND

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07/14/24	MCM	Finalize further revised draft child-protection protocols prior to dissemination to client parties.	1.00	\$825.00
07/15/24	MCM	Work on pending diocesan/religious order case update in advance of continued mediations (.8); email correspondence with client parties regarding child-protection protocols and related issues (.6).	1.40	\$1,155.00
07/16/24	MCM	Email correspondence with client parties regarding child-protection protocols and related issues (.4); review email correspondence with third-party expert regarding same (.2); meeting with M. Rofaeil to discuss updates to pending case status chart and related issues (.3); revise chart with updated information (.3).	1.20	\$990.00
07/17/24	MCM	Work on issues in connection with potential candidates for compliance coordinator and child-protection protocols.	0.80	\$660.00
07/19/24	MCM	Work on plan issues in advance of meetings with Committee counsel.	0.60	\$495.00
07/19/24	MRL	Listen to the Rochester status hearing regarding the Purdue decision in order to advise possible third-party releases (1.2); draft a summary of the Rochester status hearing for the Foley team (.6).	1.80	\$1,026.00
07/22/24	MCM	Analyze issues in connection with feedback from Committee regarding child-protection protocols (.6); draft email to Foley team with recommendations for same (.6).	1.20	\$990.00
07/22/24	MRM	Research in connection with Harrisburg Compliance Coordinator.	0.70	\$399.00
07/25/24	MCM	Revise pending diocesan/religious order case status chart in response to requests for information on post-Purdue Pharma developments.	1.50	\$1,237.50
07/26/24	MCM	Draft comprehensive email memorandum update to A. Uetz regarding status of pending diocesan/religious order bankruptcy cases for use in context of RCBO plan formation.	1.40	\$1,155.00
07/29/24	MCM	Analyze pending case update from M. Rofaeil in context of plan development for RCBO.	0.50	\$412.50
07/29/24	MDL	Evaluate possible structures for opt-out plan releases.	0.10	\$80.00

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07/30/24	AMUE	Analyze real estate for possible plan funding support.	1.00	\$925.00
07/30/24	MCM	Review comments to child-protection protocols from expert consultant and prepare for meeting with same.	0.50	\$412.50
07/31/24	MCM	Continue review of comments to child-protection protocols from expert consultant and preparation for meeting with same.	0.60	\$495.00
		Task Total:	54.80	\$41,414.50

008 Communications with Client

07/01/24	MDL	Telephone conference with M. Kemner regarding June mediation progress and action items coming out of same.	0.20	\$160.00
07/02/24	MDL	Email exchange with P. Bongiovanni regarding restricted gift.	0.40	\$320.00
07/02/24	MDL	Email exchange with P. Bongiovanni regarding restricted gift.	0.30	\$240.00
07/08/24	MCM	Conference call with Foley team leads and client parties regarding case strategy and related matters.	1.80	\$1,485.00
07/08/24	MDL	Telephone conference with M. Kemner and Foley team regarding insurance matters, specific survivor claim, analysis of Purdue Pharma, real estate valuation issues, and other plan strategy points.	1.90	\$1,520.00
07/09/24	AMUE	Communication with A. Bardos and P. Bongiovanni regarding finance issue.	0.70	\$647.50
07/12/24	AMUE	Finalize update for client regarding recent developments and strategy.	0.70	\$647.50
07/15/24	AMUE	Communication with V. Rosas and M. Kemner regarding mediation.	0.20	\$185.00
07/15/24	AMUE	Meeting with M. Kemner and M. Lee regarding strategy related to mediation and related privileged issues.	1.00	\$925.00
07/15/24	MCM	Conference call with client parties regarding case strategy issues, including mediation.	1.00	\$825.00

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07/15/24	MDL	Telephone conference with M. Kemner and Foley team regarding privileged issue (1.0); prepare for same (.2).	1.20	\$960.00
07/16/24	AMUE	Finalize memorandum updating status of case for client leadership.	0.80	\$740.00
07/16/24	MDL	Evaluate Valley Foundation grant process and client's request for information on effect of donation from the foundation.	0.50	\$400.00
07/17/24	MDL	Email exchange with R. Medeiros, A. Bardos, M. Kemner, and R. Pierre-Antoine regarding restricted gift from regular donor.	0.80	\$640.00
07/22/24	MDL	Telephone conference with M. Kemner and Foley team (A. Uetz, M. Moore, E. Mazzocco) regarding confidential mediation issues and negotiations of same with Committee.	0.90	\$720.00
07/23/24	AMUE	Multiple communications with M. Kemner and V. Rosas regarding mediation matters.	0.50	\$462.50
07/24/24	AMUE	Draft memorandum regarding confidential mediation issue to provide advice to client leadership.	1.50	\$1,387.50
07/24/24	AMUE	Draft memorandum to M. Kemner regarding confidential mediation issue for the purpose of providing advice to Bishop Barber.	0.90	\$832.50
07/24/24	AMUE	Email communication with A. Bardos regarding Finance Council meeting (.4); prepare for Finance Council meeting (1.2).	1.60	\$1,480.00
07/24/24	MCM	Analyze email correspondence with client parties regarding case strategy.	0.40	\$330.00
07/25/24	AMUE	Analyze privileged memorandum received from M. Kemner regarding certain nondebtor Catholic entities.	0.90	\$832.50
07/25/24	MDL	Email exchange with J. Ang (RCBO) regarding funding of premium finance agreement down payment and monthly installments.	0.10	\$80.00
07/26/24	MCM	Review of draft client update regarding RCBO status and revisions to same from M. Lee.	0.50	\$412.50

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07/26/24	MDL	Revise summary for leadership regarding recent mediation developments and anticipated issues in upcoming mediations.	0.60	\$480.00
07/29/24	AMUE	Draft/finalize important update and strategy memorandum for client leadership.	1.10	\$1,017.50
07/29/24	MDL	Email correspondence with J. Ang regarding Eucharistic Congress expenses.	0.10	\$80.00
07/30/24	MCM	Review email correspondence regarding case status with client parties (.3); analyze same in context of response with A. Uetz (.3).	0.60	\$495.00
07/31/24	MCM	Email and telephone correspondence with client parties regarding case issues.	0.60	\$495.00
07/31/24	SJM	Respond to A. Bardos regarding notice received.	0.30	\$225.00
		Task Total:	22.10	\$19,025.00

009 Corporate Governance and Board Issues

07/09/24	JPWI	Review correspondence from State of California and draft related correspondence.	0.50	\$400.00
		Task Total:	0.50	\$400.00

011 Cash Management

07/01/24	EPK	Review materials provided to the Committee regarding restricted cash analysis and legal basis for restrictions (.5); conference call with the Committee's advisors to discuss and walk through RCBO's restricted cash substantiation (.7); Foley team debrief following same (.6); review updated cash substantiation tracker prepared by D. Flanagan of VeraCruz following call with the Committee's advisors (.2).	2.00	\$1,600.00
07/01/24	JJK	Conference regarding restricted gifts with Committee representatives; conference with internal team.	1.50	\$1,312.50
07/01/24	MDL	Draft summary of projected costs for VeraCruz cash forecast.	0.40	\$320.00

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07/02/24	EPK	Email correspondence with M. Lee and P. Bongiovanni regarding accounting of newly received restricted funds.	0.20	\$160.00
07/02/24	MDL	Analyze restricted gift issue.	0.40	\$320.00
07/08/24	AMUE	Review update to cash forecast.	0.50	\$462.50
07/09/24	MDL	Analyze revised restricted cash analyses in advance of sending same to Committee.	0.20	\$160.00
07/10/24	AMUE	Provide information for cash forecast (1.1); communications with D. Flanagan regarding same (.6).	1.70	\$1,572.50
07/16/24	AMUE	Provide inputs to D. Flanagan for updated cash forecast (1.1); analyze cash forecast against other dates in the chapter 11 case (.6); meeting with D. Flanagan regarding updated cash forecast (.7).	2.40	\$2,220.00
07/16/24	MDL	Evaluate inputs to cash forecast prepared by VeraCruz.	0.20	\$160.00
07/19/24	AMUE	Communications with D. Flanagan regarding cash forecast (.4); review revised cash forecast (.3).	0.70	\$647.50
07/29/24	MCM	Analyze email correspondence with A&M regarding cash situation and related issues.	0.60	\$495.00
07/29/24	MCM	Analyze email correspondence regarding reimbursement of certain expenses in bankruptcy case.	0.30	\$247.50
07/29/24	MDL	Analyze reimbursement of Eucharistic Congress expenses.	0.20	\$160.00
07/29/24	MDL	Provide instruction to J. Harper regarding Eucharistic Congress expenses.	0.10	\$80.00
07/30/24	AMUE	Prepare for (.7) and meet with possible lender and client finance team to discuss possible loan (.6).	1.30	\$1,202.50
07/30/24	MDL	Evaluate information from RCBO finance team regarding Eucharistic Congress expenses.	0.50	\$400.00
07/31/24	MDL	Email exchange with A. Uetz and J. Harper regarding Eucharistic Congress expense reimbursement issue.	0.20	\$160.00
Task Total:			13.40	\$11,680.00

013 Employee Issues

07/29/24	JSH	Communications with M. Lee regarding priest reimbursement issue (.2); call with J. Ang regarding the same (.3); notes to file (.3); review J. Ang documents (.3).	1.10	\$770.00
07/30/24	JSH	Communications with M. Lee and A. Uetz regarding priest reimbursement analysis.	0.30	\$210.00
		Task Total:	1.40	\$980.00

014 Exclusivity

07/17/24	SJM	Begin drafting fourth motion to extend exclusivity (1.1); email to M. Lee regarding timing for same (.2).	1.30	\$975.00
07/23/24	SJM	Work on drafting motion to extend exclusivity.	1.40	\$1,050.00
07/24/24	SJM	Continue drafting motion to extend exclusivity (4.6); prepare notice of hearing and proposed order on motion to extend exclusivity (.3).	4.90	\$3,675.00
07/25/24	MDL	Revise draft of fourth exclusivity motion.	1.40	\$1,120.00
07/25/24	MDL	Revise draft of notice of hearing for fourth exclusivity motion.	0.10	\$80.00
07/25/24	MDL	Revise draft of proposed order granting fourth exclusivity motion.	0.10	\$80.00
07/26/24	MDL	Revise declaration in support of exclusivity motion.	0.30	\$240.00
07/26/24	MDL	Further revisions to exclusivity motion.	0.80	\$640.00
07/26/24	SJM	Prepare declaration in support of motion to extend exclusivity.	0.60	\$450.00
07/30/24	MCM	Email correspondence regarding exclusivity issues in RCBO case.	0.30	\$247.50
07/30/24	SJM	Further revisions to motion to extend exclusivity (.8); email to A. Bardos regarding same (.4).	1.20	\$900.00
07/31/24	AMUE	Revisions to motion to extend exclusivity.	1.90	\$1,757.50

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07/31/24	JCH	Finalize Fourth Motion to Extend Exclusivity, Declaration and Notice of Hearing (.4); file same (.1); calendar response deadline regarding same (.1).	0.60	\$180.00
07/31/24	MCM	Email correspondence regarding exclusivity motion and claims issues in RCBO case.	0.30	\$247.50
07/31/24	SJM	Revise motion to extend exclusivity and supporting declaration based on comments from A. Uetz (.8); finalize motion and supporting documents (.3).	1.10	\$825.00
Task Total:			16.30	\$12,467.50

016 General Case Strategy (includes team calls)

07/07/24	EPK	Review M. Rofaeil's summary of the Norwich bankruptcy hearing on plan issues following the Purdue decision.	0.10	\$80.00
07/08/24	EPK	Email correspondence with A. Uetz regarding Purdue analysis for internal and client review.	0.20	\$160.00
07/08/24	TFCA	Review privileged issue and possible claim (.3); review emails from M. Moore (.3); telephone call with M. Moore regarding privileged issue (.4); follow up regarding same and new information (.3); review email from A. Uetz regarding bankruptcy analysis (.2).	1.50	\$1,987.50
07/09/24	AMUE	Communication with M. Adeyamo regarding SD chapter 11 case.	0.50	\$462.50
07/10/24	MDL	Revise memorandum regarding third-party release options in light of Purdue Pharma.	0.60	\$480.00
07/11/24	TFCA	Review emails regarding privileged issue and respond (.2); review follow-up regarding same (.2).	0.40	\$530.00
07/12/24	TFCA	Review emails regarding privileged issue.	0.50	\$662.50
07/15/24	MCM	Review bar date extension order entered in Franciscan Friars case (.2); email Foley team regarding same (.2).	0.40	\$330.00

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07/15/24	MDL	Telephone conference with A. Uetz to discuss short-term task list, plan funding issues, and confidential mediation issues.	0.60	\$480.00
07/15/24	SJM	Call with E. Khatchaturian regarding pending state court matters and approach to removal deadline.	0.60	\$450.00
07/15/24	TFCA	Review emails regarding follow up on privileged issue (.3); telephone call and emails with M. Moore regarding same (.3).	0.60	\$795.00
07/16/24	TFCA	Attention to priest penitent privilege issues (.1); telephone call with M. Moore regarding same (.2).	0.30	\$397.50
07/18/24	MCM	Conference call with Foley team regarding case strategy and work streams.	0.80	\$660.00
07/18/24	MDL	Begin drafting list of real estate parcels to be used as potential loan collateral or asset sales.	1.00	\$800.00
07/18/24	MDL	Telephone conference with A. Uetz regarding real estate valuation strategy and options.	0.50	\$400.00
07/18/24	MDL	Prepare for (.2) and telephone conference with (.7) Foley team to discuss ongoing work streams, progress of each, and timing for deliverables, including insurance coverage analysis, mediation deliverables, and main bankruptcy case motions.	0.90	\$720.00
07/18/24	MR	Attend case team strategy call regarding various work streams with A. Uetz, M. Lee, M. Moore, E. Mazzocco, S. Moses, D. Habib and M. Rofaail.	0.70	\$483.00
07/18/24	MRL	All-hands call with the Foley team to discuss the status of the case and next steps (.8); draft a summary of the call in order to circulate to the Foley team (.6).	1.40	\$798.00
07/18/24	SJM	Attend all-hands team meeting.	0.70	\$525.00
07/19/24	AMUE	Strategy meeting with M. Lee and C. Moore concerning privileged mediation matters (1.0); prepare for same (.8).	1.80	\$1,665.00
07/19/24	AMUE	Analyze whether to file protective proof of claim in Friars case.	0.40	\$370.00
07/19/24	MDL	Evaluate strategy on real estate valuation and appraisal options.	0.40	\$320.00

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07/19/24	MDL	Telephone conference with A. Uetz and C. Moore regarding exit loan collateral and negotiation strategy.	1.00	\$800.00
07/19/24	MDL	Complete drafting list of real estate parcels to be used as potential loan collateral or asset sales.	0.90	\$720.00
07/19/24	MDL	Telephone conference with A. Uetz regarding reorganization strategy and go-forward mediation strategy.	0.30	\$240.00
07/22/24	AMUE	Review open issues with Committee to discuss with client in preparation for next meeting with Lowenstein.	1.10	\$1,017.50
07/22/24	MCM	Email correspondence regarding RCBO proof of claim for filing in FFCA bankruptcy case.	0.40	\$330.00
07/22/24	MDL	Strategize with A. Uetz for future mediation sessions and real estate valuation issue.	1.20	\$960.00
07/25/24	AMUE	Prepare for Finance Council meeting (1.1); attend Finance Council meeting (1.4) (partial).	2.50	\$2,312.50
07/25/24	MCM	Conference call with Foley team regarding work streams, tasks under way, and strategy moving forward.	1.00	\$825.00
07/25/24	MDL	Telephone conference with A. Uetz regarding past survivor settlements and impact of same on negotiations.	1.10	\$880.00
07/25/24	MR	Attend strategy call to coordinate various work streams with A. Uetz, E. Ridley, M. Moore, E. Mazzocco, S. Moses, D. Habib and M. Rofaail.	0.80	\$552.00
07/25/24	MRL	All-hands call with the Foley team to discuss the status of the case and next steps (.8); draft a summary of the call in order to circulate to the Foley team (.3).	1.10	\$627.00
07/28/24	MCM	Review email correspondence regarding case strategy and related issues (.3); work on same in preparation for upcoming mediation meetings (.5).	0.80	\$660.00
07/28/24	MDL	Evaluate recent status conferences from other diocesan cases and discussions of Purdue Pharma case in same.	0.30	\$240.00
07/29/24	MDL	Email exchange with C. Moore (A&M) regarding asset and cash positions of NDCEs.	0.20	\$160.00

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07/30/24	MCM	Follow-up email correspondence with Foley team regarding outstanding work streams and related issues.	0.40	\$330.00
07/31/24	MCM	Email correspondence with Foley team regarding outstanding work streams and related issues.	0.50	\$412.50
		Task Total:	28.50	\$24,622.50

017 Hearings and Court Matters

07/10/24	AMUE	Help prepare E. Ridley for oral argument regarding insurer motions to dismiss.	1.50	\$1,387.50
07/11/24	AMUE	Prepare for hearing on two motions to dismiss and case management conference (1.5); appearance at hearing on same (3.0); post-hearing meeting with counsel for UCC (1.0).	5.50	\$5,087.50
07/11/24	EPM	Attend motion to dismiss oral argument (2.0); review policy demand letters and Committee letters (.6); draft mediation statement (1.3).	3.90	\$2,925.00
07/11/24	ERR	Prepare for (2.0) and attend (2.0) hearing on motions to dismiss by Pacific, Excess insurers, and CIGA and Case Management Conference.	4.00	\$3,900.00
07/25/24	MDL	Appear for Debtor at hearing on premium finance agreement.	0.30	\$240.00
07/25/24	MDL	Prepare for hearing on motion to approve premium finance agreement.	0.30	\$240.00
07/25/24	SJM	Prepare for hearing on motion for approval of premium finance agreement (2.3); attend hearing on approval of premium finance agreement (.3).	2.60	\$1,950.00
		Task Total:	18.10	\$15,730.00

018 Non-Bankruptcy Litigation

07/02/24	SJM	Telephone call with E. Khatchaturian regarding state court litigation matters (.4); email to A. Ouellette regarding background on matter (.1); email to M. Lee regarding removal deadline (.1).	0.60	\$450.00
07/08/24	EPK	Review case management statement filed in Case Number CIV2101159 (.1); determine impact of proceedings on RCBO's estate (.1).	0.20	\$160.00
07/08/24	SJM	Review case management statement filed in state court case.	0.20	\$150.00
07/09/24	EPK	Email correspondence with A. Uetz regarding status of certain state court actions involving RCBO priests.	0.20	\$160.00
07/10/24	EPK	Review CMC and add-on orders in the JCCP 5108 (.3); follow up with A. Ouellette regarding docketing of relevant conference dates (.1).	0.40	\$320.00
07/10/24	EPK	Email coordination with liaison counsel D. Zamora regarding JCCP 5108 stay concerns.	0.40	\$320.00
07/11/24	EPK	Email correspondence with D. Zamora of Weintraub firm and P. Glaessner of AGHW regarding JCCP add-on issues.	0.20	\$160.00
07/12/24	EPK	Conference call with JCCP defendants' liaison counsel, D. Zamora, and P. Glaessner of AGHW regarding JCCP add-on issues.	0.40	\$320.00
07/15/24	EPK	Coordinate with S. Moses regarding automatic stay issues relating to AB 218 actions (.5); analyze stay issues relating to actions recently added to JCCP 5108 and related requests for service from plaintiffs' counsel (.9).	1.40	\$1,120.00
07/24/24	EPK	Follow up on status of actions that are not coordinated in the JCCP 5108 (.2); email correspondence with S. Moses regarding same (.2); email correspondence with L. Markarian of Winston & Strawn regarding procedural issues relating to JCCP 5108 (.2); review comprehensive report prepared by S. Moses relating to this afternoon's CMC in JCCP 5108 and related automatic stay analysis (.3).	0.90	\$720.00

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07/24/24	SJM	Draft response to state court plaintiff's counsel regarding request to accept service of process (.5); telephone call with JCCP defense liaison counsel regarding separately scheduled status conferences and related issues (.4); prepare detailed summary of status of state court matters (1.4); attend monthly case management conference in JCCP 5108 (1.0); email summary of 5108 status conference to E. Khatchatourian (.3).	3.60	\$2,700.00
07/25/24	EPK	Email correspondence with P. Glaessner of AGHW regarding order adding on case to the JCCP 5108 (.2); review order adding on cases to determine nature of actions added to JCCP 5108 (.1).	0.30	\$240.00
07/28/24	EPK	Review recent email correspondence with O. Rosaluk of DLA Piper regarding co-defendant litigation issues.	0.20	\$160.00
Task Total:			9.00	\$6,980.00

020 Retention/Billing/Fee Applications for Debtor Professionals

07/02/24	SJM	Prepare stipulation to continue hearings on fee applications based on request from fee examiner (1.1); Email correspondence with parties regarding proposed stipulation (.2).	1.30	\$975.00
07/03/24	SJM	Email to fee examiner with LEDES file for Foley May monthly statement (.1); work on finalizing stipulation to continue hearing on interim fee applications (.3).	0.40	\$300.00
07/06/24	TND	Begin review of June Foley fee statement to ensure compliance with U.S. Trustee Guidelines.	0.90	\$661.50
07/08/24	TND	Further preparation of information for June monthly fee statement to ensure compliance with U.S. Trustee guidelines.	1.70	\$1,249.50
07/09/24	AMUE	Revisions to Foley's monthly fee statement to ensure compliance with U.S. Trustee guidelines.	2.00	\$1,850.00
07/09/24	JCH	Prepare (.3) and file (.2) certificates of no objection to Foley and A&M monthly fee statements for May 2024.	0.50	\$150.00

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07/09/24	SJM	Email correspondence with A. Uetz and C. Moore regarding monthly fee statements (.2); review draft CNOs for monthly fee statements (.2); email to client regarding payment of monthly fee statements (.4).	0.80	\$600.00
07/09/24	TND	Further preparation of information for June monthly fee statement to ensure compliance with U.S. Trustee Guidelines.	0.40	\$294.00
07/10/24	MCM	Provide additional information for monthly fee statement.	0.30	\$247.50
07/10/24	SJM	Respond to J. Ang regarding amount for payment on Breall monthly fee statement.	0.30	\$225.00
07/11/24	TND	Further preparation of information for June fee statement to ensure compliance with U.S. Trustee Guidelines.	1.30	\$955.50
07/12/24	SJM	Review order continuing hearing on fee applications (.1); email to case team regarding same (.1); prepare notice of continued hearing on interim fee applications (.7).	0.90	\$675.00
07/12/24	TND	Further preparation of June fee statement to ensure compliance with U.S. Trustee Guidelines.	0.60	\$441.00
07/23/24	AMUE	Work on Foley's June fee statement.	2.00	\$1,850.00
07/24/24	SJM	Review summary of fee examiner's initial report on Foley's third interim fee application (.3); email correspondence with M. Lee and A. Uetz regarding same (.1).	0.40	\$300.00
07/24/24	TND	Review A&M June fee statement.	0.20	\$147.00
07/28/24	SJM	Prepare chart of responses to fee examiner's interim report on Foley's third interim fee application (1.2); draft letter responding to fee examiner's interim report (.7).	1.90	\$1,425.00
07/29/24	AMUE	Revisions to Foley's monthly fee statement for June time.	2.20	\$2,035.00
07/29/24	JCH	Prepare draft of Foley monthly fee statement for June 2024.	0.50	\$150.00
07/29/24	MDL	Revise letter to fee examiner regarding his objections to third interim fee application.	0.30	\$240.00

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07/29/24	SJM	Review draft letter to fee examiner based on comments from M. Lee, and email to A. Uetz regarding same.	0.40	\$300.00
07/29/24	TND	Further preparation of Foley June Fee Statement.	0.30	\$220.50
07/30/24	JCH	Finalize (.6) and file (.2) Foley monthly fee statement for June 2024; file A&M monthly fee statement for June 2024 (.2); calendar response deadline for same (.1).	1.10	\$330.00
07/30/24	TND	Finalize June Foley Fee Statement for filing.	0.60	\$441.00
07/31/24	SJM	Email correspondence with A. Uetz and M. Lee regarding letter to fee examiner.	0.20	\$150.00
Task Total:			21.50	\$16,212.50

021 Retention/Fee Applications: Ordinary Course Professionals

07/09/24	EPK	Review LMI's limited objection to the retention of IAS as an OCP.	0.20	\$160.00
07/09/24	MDL	Strategize regarding reply to LMI objection to IAS OCP retention.	0.20	\$160.00
07/09/24	MDL	Analyze LMI objection to IAS OCP retention.	0.20	\$160.00
07/09/24	SJM	Analyze LMI opposition to IAS ordinary course employment (.8); Email to A. Uetz regarding timing for response and strategy regarding same (.4).	1.20	\$900.00
07/09/24	TND	Initial review of LMI Objection to IAS OCP retention.	0.20	\$147.00
07/10/24	SJM	Draft proposed email to LMI regarding OCP employment of IAS.	0.70	\$525.00
07/10/24	TND	Review analysis of objection to LMI's objection to IAS (.2); discuss same with S. Moses as well as other OCP matters (.3).	0.50	\$367.50
07/16/24	SJM	Work on drafting reply to LMI opposition to employment of IAS as an OCP.	1.60	\$1,200.00
07/19/24	SJM	Continue to work on reply to LMI objection to retention of IAS as ordinary course professional.	1.80	\$1,350.00

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07/22/24	TND	Suggest revisions to M. Kemner June invoice (.3); correspondence with M. Kemner regarding same (.1); follow up with Foley team on OCP quarterly report to be filed at end of the month (.1).	0.50	\$367.50
07/23/24	SJM	Email to A. Uetz and M. Lee regarding status of retention of IAS as ordinary course professional.	0.50	\$375.00
07/24/24	SJM	Send email to counsel for LMI regarding objection to ordinary course retention of insurance archaeologist.	0.30	\$225.00
07/24/24	TND	Circulate Kemner June invoice to Committee counsel (.1); circulate same to U.S. Trustee (.1).	0.20	\$147.00
07/29/24	SJM	Review LMI notice of withdrawal of objection to IAS employment (.1); analyze next steps for IAS retention in light of same, including review of OCP order to confirm no further approval needed (.3); email to E. Ridley regarding IAS authorization to start work (.1).	0.50	\$375.00
07/30/24	JCH	File Certificate of Compliance with ordinary course professional order.	0.20	\$60.00
07/30/24	SJM	Prepare certification of compliance with OCP order.	0.60	\$450.00
Task Total:			9.40	\$6,969.00

022 Retention/Fee Applications: Other Professionals

07/03/24	SJM	Email to A. Bardos regarding Sontchi monthly fee statement.	0.20	\$150.00
07/09/24	SJM	Call with B. Albert regarding service of monthly fee statements on Debtor.	0.20	\$150.00
07/16/24	TND	Review email from G. Albert on CNO for Committee expenses.	0.10	\$73.50
07/17/24	SJM	Email to client regarding Sontchi monthly fee statement.	0.30	\$225.00
Task Total:			0.80	\$598.50

024 Tax Issues

07/05/24	MTSC	Review status of exemption application for non-profit entity; email to client regarding same.	0.80	\$920.00
07/08/24	MTSC	Email to client with instructions for completing exemption application under RCBO direction per IRS requirement.	0.90	\$1,035.00
07/09/24	KTLE	Review Secretary of State records and obtain most recently filed Statement of Information (.2); emails regarding same (.2).	0.40	\$166.00
07/09/24	MTSC	Conduct required IRS review of exemption application for non-profit entity (.5); email to client regarding changes (.3).	0.80	\$920.00
07/11/24	MTSC	Conduct required IRS review of exemption application for non-profit entity (.4); telephone conference with client regarding same (.3).	0.70	\$805.00
07/12/24	MTSC	Complete required IRS review of non-profit entity exemption application and email to recommend inclusion in group determination letter.	0.50	\$575.00
		Task Total:	4.10	\$4,421.00

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

07/08/24	EPK	Email correspondence with the RCBO team and VeraCruz team regarding preparation of the June 2024 monthly operating report and oversight of same by S. Moses.	0.20	\$160.00
07/19/24	SJM	Review draft motion operating report (.6); email correspondence with A. Bardos and D. Flanagan regarding questions regarding MOR (.2).	0.80	\$600.00
07/21/24	SJM	Telephone call with D. Flanagan regarding monthly operating report.	0.20	\$150.00
07/22/24	JCH	File monthly operating report for June 2024.	0.20	\$60.00
07/22/24	SJM	Final review of monthly operating report (.4); email to D. Flanagan regarding preparation of quarterly OCP report (.2).	0.60	\$450.00
07/24/24	EPK	Review proposed calculation of U.S. Trustee's quarterly fees for Q2 2024.	0.10	\$80.00

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07/30/24	EPK	Email correspondence with A. Bardos and D. Flanagan of VeraCruz regarding calculation and payment of Q2 2024 quarterly U.S. Trustee fees (.3); brief review of June 2024 MOR supplements for the BRG team (.1).	0.40	\$320.00
07/30/24	SJM	Email correspondence with client regarding payment of U.S. Trustee quarterly fees.	0.20	\$150.00
07/31/24	EPK	Email correspondence with A. Bardos, D. Flanagan of VeraCruz, and K. Farrar regarding supplemental MOR files to be produced to the BRG team.	0.20	\$160.00
Task Total:			2.90	\$2,130.00

026 Unsecured Creditor Issues/Communications/Meetings

07/01/24	MDL	Participate in presentation to Committee counsel and FA regarding restricted cash analysis.	0.80	\$640.00
07/01/24	MDL	Telephone conference with Foley (E. Khatchaturian, J. Kohout), A&M (S. Levitt), VeraCruz (D. Flanagan, C. de Quesada), and P. Bongiovanni regarding data requested by Committee professionals during presentation.	0.70	\$560.00
07/01/24	MDL	Prepare for presentation to Committee counsel and FA regarding restricted cash analysis.	0.40	\$320.00
07/02/24	SJM	Email correspondence with A. Bardos and P. Bongiovanni regarding Committee member request for reimbursement.	0.30	\$225.00
07/03/24	MCM	Draft email correspondence with Committee counsel regarding dissemination of revised child-protection protocols.	0.30	\$247.50
07/08/24	MCM	Conference call with counsel for Committee regarding draft child-protection protocols and related issues.	0.50	\$412.50
07/10/24	AMUE	Meeting with P. Bongiovanni regarding Committee document requests (.3); review outstanding priority requests (.8).	1.10	\$1,017.50
07/15/24	MCM	Telephone conference with counsel for Committee regarding case issues, including production of revised master key to insurers.	0.50	\$412.50

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07/16/24	SJM	Respond to G. Albert regarding status of Committee member reimbursement.	0.10	\$75.00
07/17/24	AMUE	Meeting with J. Prol and B. Weisenberg regarding settlement issues (1.0); review information regarding Committee proposal regarding valuation of real estate (.5).	1.50	\$1,387.50
07/17/24	SJM	Email correspondence with J. Ang and G. Albert regarding Committee member expense reimbursement.	0.30	\$225.00
07/23/24	SJM	Email correspondence with G. Albert regarding Committee member expense reimbursement.	0.20	\$150.00
07/24/24	MCM	Attention to issues concerning production of documents to Committee and Committee professionals.	0.50	\$412.50
07/25/24	AMUE	Confer with M. Lee regarding production of certain documents to Committee.	1.10	\$1,017.50
07/25/24	MCM	Telephone conference with counsel for Committee regarding outstanding issues.	0.80	\$660.00
07/29/24	SJM	Analyze approach to request from Committee counsel for stipulation modifying interim compensation order.	0.40	\$300.00
07/30/24	SJM	Call with G. Albert regarding approach to notices under interim compensation order (.3); email confirming agreement regarding same (.3).	0.60	\$450.00
Task Total:			10.10	\$8,512.50

027 Real Estate and Real Property Issues

07/01/24	JRBL	Communications with P. Bongiovanni regarding water district claim.	0.80	\$1,020.00
07/03/24	MCM	Analyze issues in connection with real estate holdings in other diocesan bankruptcy cases.	0.50	\$412.50
07/05/24	MCM	Analysis of other diocesan real estate holdings in connection with inquiries from Committee.	1.00	\$825.00
07/08/24	JRBL	Respond to email from client regarding removal of hazardous environmental conditions at client site.	0.60	\$765.00

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07/08/24	MCM	Analysis of other diocesan real estate holdings in connection with inquiries from Committee.	1.00	\$825.00
07/09/24	AMUE	Analyze privileged issue regarding real estate titled in Debtor's name and held in trust for another.	1.20	\$1,110.00
07/09/24	MCM	Email correspondence with Alvarez team regarding backup to Schedules and SOFA on real estate (.3); review documentation provided in preparation for conference call regarding same (.4); conference call with Alvarez team (.3); email correspondence with A. Uetz regarding real-estate issues (.3).	1.30	\$1,072.50
07/11/24	JRBL	Analysis of denial from Church Mutual on property damage claim (.6); telephone conference with P. Bongiovanni regarding denial (.6).	1.20	\$1,530.00
07/12/24	JRBL	Telephone conference with E. Ridley regarding Church Mutual denial of claim and strategy.	0.30	\$382.50
07/18/24	JRBL	Telephone conference with P. Bongiovanni regarding new hazards at parish sinkhole and strategy.	0.80	\$1,020.00
07/19/24	AMUE	Review issue concerning sinkhole repair (.3); communication with J. Blease regarding same (.3).	0.60	\$555.00
07/19/24	JRBL	Analysis of legal issues related to demolition project permitting.	1.30	\$1,657.50
07/22/24	KAFA	Analysis of update from S. Martinez including analysis of Kerex proposal and current photos and videos of the damaged property.	0.40	\$158.00
Task Total:			11.00	\$11,333.00

028 Tort Claims

07/01/24	MCM	Begin review of privileged issue following news reports and reach-out from Committee.	0.50	\$412.50
07/02/24	MCM	Factual development work on privileged issue through speaking with client parties and reviewing documentation provided by same.	1.50	\$1,237.50

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07/03/24	MCM	Factual development work on privileged issue through speaking with client parties and reviewing documentation provided by same.	1.30	\$1,072.50
07/05/24	MCM	Continue working on factual development in connection with privileged issue.	0.80	\$660.00
07/08/24	AMUE	Analyze privileged issue (.7); provide advice to Foley team regarding same (.6); draft privileged communication to R. Medeiros regarding same (.7) ; draft privileged communication to M. Kemner regarding same (.4); review privileged memorandum regarding same (.4).	2.80	\$2,590.00
07/08/24	MCM	Email correspondence with client parties regarding privileged issue and factual development of same (.6); telephone conference with T. Carlucci regarding strategy for procuring additional information (.4); telephone conferences with client parties regarding same (1.0); review information discovered in connection with privileged issue (.5). draft email memorandum regarding additional facts discovered to date (.5).	3.00	\$2,475.00
07/09/24	AMUE	Communication with R. Medeiros regarding privileged issue.	0.80	\$740.00
07/10/24	MCM	Work on issues in connection with factual development of privileged issue.	0.60	\$495.00
07/11/24	MCM	Email correspondence with client parties and outside counsel regarding privileged issue and continued factual development of same (.5); analyze issues in light of additional events (.5).	1.00	\$825.00
07/12/24	MCM	Work on follow-up issues in connection with privileged issue in light of bankruptcy proceeding.	0.60	\$495.00
07/15/24	MCM	Continue working on privileged issue and related issues with client parties.	0.80	\$660.00
07/16/24	MCM	Review email correspondence with client parties regarding privileged issue (.3); analyze issues in connection with same in preparation for client call on July 18 (.5).	0.80	\$660.00
07/17/24	MCM	Prepare for conference call with client parties regarding privileged issue and next steps.	0.30	\$247.50
07/18/24	MCM	Conference call with client parties regarding privileged issue and next steps.	0.60	\$495.00

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07/24/24	MCM	Analyze issues regarding claimant inquiry directly to Diocese and reconcile information provided by same against filed claims.	0.50	\$412.50
07/25/24	MCM	Email correspondence regarding prior analysis of claims against third parties or that contain allegations against same.	0.60	\$495.00
07/29/24	MCM	Review litigation files and related documents in context of claims against third parties and related entities (1.0); email correspondence with client parties regarding potential claim situations (.3).	1.30	\$1,072.50
07/30/24	MCM	Prepare factual outline and report on existing privileged issue following discussion with client parties.	0.60	\$495.00
07/31/24	KAFA	Analysis of claims involving affiliated entities and related issues.	0.80	\$316.00
07/31/24	MCM	Telephone conference with K. Farrar regarding prior analyses of claims against third parties and related entities (.5); draft email memorandum to A. Uetz regarding same (.5); review prepetition client documentation including attorney work-product (.5).	1.50	\$1,237.50
Task Total:			20.70	\$17,093.50

030 Insurance Issues (other than coverage)

07/12/24	SJM	Email correspondence with insurance broker regarding status of insurance renewals (.3); telephone call with A. Bardos regarding same (.2); telephone calls with broker regarding same (.8); review premium finance agreement and related documents in order to determine bankruptcy court approval requirements (1.4); email to M. Lee detailing status of premium finance agreement and need to obtain approval pursuant to section 364 (.6).	3.30	\$2,475.00
07/15/24	MDL	Analyze new insurance policy cost issue and terms of new premium finance agreement.	0.20	\$160.00
07/15/24	MDL	Provide instruction to M. Rofaail (Foley) regarding motion to approve premium finance agreement.	0.20	\$160.00

07/15/24	MRL	Confer with S. Moses regarding drafting the Debtor's second motion to approve insurance premium finance agreement (.2); analyze premium finance agreement (.9); draft the Debtor's second motion to approve insurance premium finance agreement (2.0); draft the proposed order granting the motion (.5); draft the Bardos declaration in support of the motion (.4).	4.00	\$2,280.00
07/15/24	SJM	Call with M. Rofaeil regarding drafting motion to approve premium finance agreement (.2); email to M. Rofaeil regarding same (.2); draft email to counsel for AFCO regarding requirement for new approval of finance agreement (.8); email to A. Bardos regarding status of premium finance approval (.4); draft email to Committee counsel regarding insurance renewals (.9).	2.50	\$1,875.00
07/16/24	MRL	Finalize drafting the Debtor's second motion to approve insurance premium finance agreement and the proposed order granting the motion (1.2); draft the application to shorten time for hearing on the motion, the proposed order, and the declaration (1.5).	2.70	\$1,539.00
07/16/24	SJM	Revise motion to approve premium finance agreement (4.3); revise declaration of A. Bardos in support of motion (.4); revise proposed order approving premium finance agreement (.2); email to counsel for AFCO regarding form of order (.7).	5.60	\$4,200.00
07/17/24	MDL	Revise motion to approve finance agreement and supporting declaration.	0.80	\$640.00
07/17/24	MDL	Revise motion to shorten time to hear motion to approve premium finance agreement and supporting declaration.	0.20	\$160.00
07/17/24	MRL	Email correspondence with S. Moses and M. Lee regarding the Debtor's second motion to approve insurance premium finance agreement.	0.30	\$171.00
07/17/24	SJM	Email correspondence with M. Lee regarding finalizing motion to approve premium finance agreement (.3); further revisions to motion to approve premium finance agreement based on comments from M. Lee (1.7); telephone call with A. Bardos regarding approval motion (.2).	2.20	\$1,650.00

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07/17/24	SJM	Email to client and insurance broker regarding filed motion to approve finance agreement, and schedule for approval (.3); email correspondence with counsel for AFCO regarding same (.4); email to A. Uetz regarding same (.2).	0.90	\$675.00
07/17/24	SJM	Email to counsel for U.S. Trustee and for the Committee regarding request to shorten time for hearing (.4); telephone call with chambers regarding timing for hearing (.2); revise application to shorten time for hearing (.4); prepare notice of hearing on shortened time (.4).	1.40	\$1,050.00
07/18/24	SJM	Review updated draft premium finance agreement and emails from broker regarding same (.4); email to client and broker regarding revised agreement and need to remove representation regarding insolvency (.3).	0.70	\$525.00
07/23/24	SJM	Email correspondence with insurance broker regarding premium finance renewal and upcoming hearing on same.	0.60	\$450.00
07/24/24	SJM	Telephone call with insurance broker regarding coverages in renewal package in preparation for hearing on approval of premium finance agreement (.4); email to M. Lee regarding same (.2); review insurance renewal information in preparation for hearing on premium finance motion (.7).	1.30	\$975.00
07/25/24	MDL	Email correspondence with S. Jaillette (counsel for AFCO) regarding proposed order granting motion to approve premium finance agreement.	0.10	\$80.00
07/25/24	MDL	Provide instruction to J. Harrison regarding completion and submission of proposed order granting motion to approve premium finance agreement.	0.10	\$80.00
07/25/24	MDL	Email correspondence with Arthur J. Gallagher personnel and A. Bardos regarding proposed order granting motion to approve premium finance agreement.	0.10	\$80.00
07/25/24	MDL	Revise proposed order granting motion to approve premium finance agreement.	0.10	\$80.00

07/25/24	SJM	Telephone call with M. Lee regarding results of hearing (.2); work on revision of proposed order approving interim finance agreement based on comments from court (.3).	0.50	\$375.00
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	Task Total:	27.80	\$19,680.00
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031 Insurance Issues (coverage, includes adversary proceeding)

07/01/24	EPM	Email communications with E. Ridley, A. Uetz, and D. Habib regarding status of insurance coverage subjects.	0.60	\$450.00
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07/01/24	ERR	Review of insurer response letters to primary limits demand.	0.50	\$487.50
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07/01/24	ERR	Begin to review responses to policy limits demand.	0.60	\$585.00
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07/01/24	ERR	Review response to policy demand letters from certain insurers.	0.50	\$487.50
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07/02/24	EPM	Email discussions with M. Lee, E. Ridley, and A. Uetz regarding insurer responses to debtor policy limits demands (.4); review insurer revisions to updated case management report (1.2); conference call with insurance counsel regarding revisions to updated case management report (.3); conference call with E. Ridley and M. Roberts regarding same (.2).	2.10	\$1,575.00
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07/02/24	ERR	Telephone conference regarding joint statement with insurer and intervenor representatives (.6); prepare for same (.3).	0.90	\$877.50
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07/02/24	ERR	Edit joint status conference statement.	0.70	\$682.50
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07/02/24	MCM	Telephone conference with counsel for insurers in adversary proceeding regarding case management report (.6); email correspondence regarding same (.3).	0.90	\$742.50
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07/02/24	MR	Attend meet and confer call with counsel for insurers and Committee regarding Case Management Statement due July 3 in District Court coverage action (partial) (.3); draft revisions to Case Management Statement to incorporate other parties' revisions and include additional information regarding discovery and Court's statements at prior case management conference (1.8).	2.10	\$1,449.00
07/03/24	EPM	Email correspondence regarding updated case management report.	0.10	\$75.00
07/03/24	ERR	Finalize joint statement for filing.	0.60	\$585.00
07/03/24	JCH	File Joint Case Management Statement.	0.50	\$150.00
07/03/24	MR	Revise Case Management Statement for District Court coverage action to create final draft incorporating all input and edits from all parties.	1.30	\$897.00
07/03/24	RTST	Work on document production to insurers.	0.20	\$148.00
07/05/24	MR	Identify key materials for July 11, 2024 hearing in District Court coverage action and communicate with E. Ridley regarding same.	0.40	\$276.00
07/08/24	AMUE	Review request from counsel for insurer regarding additional information related to proofs of claim (.3); provide direction to Foley team to respond to same (.4).	0.70	\$647.50
07/08/24	DMH	Attend check-in call with RCBO insurance team regarding insurer response spreadsheet (.4); follow up regarding same (.2).	0.60	\$285.00
07/08/24	DMH	Analyze recent insurer coverage letters to understand the insurers' respective positions and prepare to update coverage insurance chart.	2.30	\$1,092.50
07/08/24	EPM	Conference call with E. Ridley and D. Habib regarding insurance coverage subjects (.4); preparation for insurance coverage conference call (.4); draft email summary to case team regarding status of work on insurance coverage subjects (.5).	1.30	\$975.00
07/08/24	ERR	Review status of coverage analysis table and response to insurers regarding policy limits demand.	0.60	\$585.00

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07/08/24	ERR	Review case status and strategy regarding pending policy limit demands and up-coming motions to dismiss.	1.10	\$1,072.50
07/08/24	MCM	Work on issues in connection with production of proofs of claim to final insurer following execution of confidentiality agreement.	0.30	\$247.50
07/08/24	MDL	Analyze supplemental index of employee files produced.	0.20	\$160.00
07/08/24	MDL	Correspondence with B. Curet (Sinnott) regarding supplemental index of employee files produced.	0.10	\$80.00
07/09/24	AMUE	Prepare for hearing on insurers' motions to dismiss and case management conference.	2.20	\$2,035.00
07/09/24	DMH	Analyze coverage position letter sent by CNA.	2.00	\$950.00
07/09/24	EPM	Email and telephone communications with team members regarding division of labor on insurance tasks (.9); coordinate with J. Harrison process to address incoming discovery for insurance coverage action (.5); draft summary of all insurance-related tasks and timelines (1.7); prepare information needed for database to house insurance coverage documents (.5); draft confidential mediation submission (1.2); conference call with A. Uetz, M. Moore, and M. Roberts regarding confidential mediation subjects (.9); preparation for conference call (.5); analysis of Rule 26 disclosures (.6); email correspondence with J. Harrison regarding matters for Zoom hearing (.4); review draft case update to client (.3).	7.50	\$5,625.00
07/09/24	ERR	Edit insurance work streams and responses.	0.60	\$585.00
07/09/24	ERR	Review materials in preparation of coverage position statement for mediators.	0.70	\$682.50
07/09/24	MCM	Email correspondence with insurer counsel regarding proof of claim production and related issues.	0.30	\$247.50
07/09/24	MCM	Conference call with A. Uetz, E. Mazzocco, and M. Roberts regarding insurance adversary case management report and related issues.	0.90	\$742.50

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07/09/24	MDL	Evaluate management of documents produced and to be produced in adversary proceeding.	0.10	\$80.00
07/09/24	MDL	Evaluate proposed course of action with respect to Pacific demand for additional information on claims.	0.10	\$80.00
07/09/24	MR	Attend strategy call with A. Uetz, E. Mazzocco and M. Moore regarding mediation statement for District Court coverage action.	0.90	\$621.00
07/09/24	MR	Review prior written discovery documents and communicate with E. Mazzocco regarding same in anticipation of upcoming discovery deadlines (.5); communicate with J. Harrison regarding status and tracking of written discovery documents (.2).	0.70	\$483.00
07/09/24	RTST	Work on production of documents to insurers.	0.70	\$518.00
07/09/24	SJM	Telephone call with E. Mazzocco regarding discovery issues in coverage litigation (.2); review background information regarding Westport RFPs in order to prepare responses (1.2).	1.40	\$1,050.00
07/10/24	DMH	Analyze case law regarding expected or intended harm from insurer's actions, focusing on case law in California and other abuse cases.	1.10	\$522.50
07/10/24	DMH	Analyze coverage letter sent by CNA.	1.20	\$570.00
07/10/24	EPM	Draft confidential insurance mediation statement (.5); conference call regarding mediation statement with E. Ridley (.5); legal research regarding insurance subjects (.5); update insurance coverage action work stream tracker (.3); review briefs submitted in support of and opposition to insurers' motions to dismiss (1.7); review policy demand letters (.5).	4.00	\$3,000.00
07/10/24	ERR	Review motion papers in preparation for hearing on insurer motions to dismiss (primary, excess and CIGA).	3.50	\$3,412.50
07/10/24	ERR	Review issues related to coverage analysis for mediators.	0.50	\$487.50

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07/10/24	JCH	Calendar continued hearing on Lloyd's Motion for Stay Pending Appeal (.2); email correspondence with E. Mazzocco regarding pro hac vice admission to District Court case (.5).	0.70	\$210.00
07/10/24	MCM	Work on issues in connection with production of proofs of claim to insurer parties that finally execute confidentiality agreement.	0.30	\$247.50
07/10/24	MRL	Review email from A. Uetz regarding update on the insurance coverage.	0.10	\$57.00
07/10/24	RTST	Work on document production to the insurers.	0.70	\$518.00
07/10/24	SJM	Review order to continue hearing on LMI motion for stay pending appeal (.2); emails with case team regarding same (.3); emails with District Court and case team confirming hearing on motions to dismiss (.3).	0.80	\$600.00
07/11/24	AMUE	Post-hearing meeting with counsel for insurers and Committee (2.3); post-meeting strategy debrief with E. Ridley (2.8).	5.10	\$4,717.50
07/11/24	DMH	Analyze case law regarding expected or intended harm as it relates to actions by an insured, in preparation for mediation.	2.70	\$1,282.50
07/11/24	ERR	Attend court-ordered meet and confer hearing with insurers regarding pleadings and discovery.	2.50	\$2,437.50
07/11/24	ERR	Review results of meet and confer with insurers and strategize focus of fourth amended complaint and required discovery.	2.50	\$2,437.50
07/11/24	JCH	Prepare detailed database for adversary proceeding documents (.5); prepare and file request for transcript of July 11, 2024 hearing in District Court case (.2); prepare pro hac vice application for E. Mazzocco in District Court case (.5).	1.20	\$360.00
07/11/24	MCM	Work on case management report with Foley insurance team.	0.50	\$412.50
07/11/24	MR	Review key information contained in policy limits demand letters and Committee demand letters, per A. Uetz request.	0.20	\$138.00
07/11/24	SJM	Begin compiling insurance litigation information requested by A. Uetz.	1.30	\$975.00

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07/12/24	DMH	Analyze case law regarding privileged issue as it relates to an insured's actions.	1.00	\$475.00
07/12/24	EPM	Draft privileged transmittal to client regarding insurance coverage action.	0.90	\$675.00
07/12/24	JCH	Calendar deadlines from Pretrial Order No. 2 related to insurance adversary proceeding.	0.20	\$60.00
07/12/24	MCM	Finalize and circulate revised master key for insurance parties pursuant to Bar Date Order (.5); email correspondence with Foley team regarding same (.2); email correspondence with insurance counsel regarding distribution on Monday, July 15 (.3).	1.00	\$825.00
07/12/24	MR	Draft update communication to client regarding District Court coverage action, including key deadlines and status of ongoing discovery efforts.	0.70	\$483.00
07/13/24	DMH	Analyze case law regarding privileged issue as it relates to an insured's actions, in preparation for mediation statement.	0.70	\$332.50
07/13/24	EPM	Draft confidential insurance mediation statement.	3.10	\$2,325.00
07/14/24	DMH	Analyze case law regarding privileged issue as it relates to an insured's actions, in preparation of mediation statement.	1.10	\$522.50
07/14/24	EPM	Draft confidential insurance mediation statement.	8.60	\$6,450.00
07/15/24	AMUE	Email to counsel for insurers regarding Exhibit A to amended complaint (.5); follow-up email regarding same (.4); draft email to counsel for insurers regarding follow-up action items to meet and confer meeting in Court (1.0).	1.90	\$1,757.50
07/15/24	DMH	Update insurance coverage chart based on recent responses received from CNA.	4.30	\$2,042.50
07/15/24	EPM	Update insurance coverage action workstream tracker (.3); conference call with A. Uetz, M. Moore, and M. Lee to discuss case status (1.2); revise confidential insurance mediation statement (.4).	1.90	\$1,425.00
07/15/24	ERR	Edit mediation statement for insurance mediators.	0.90	\$877.50

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07/15/24	ERR	Attend conference call with team regarding strategy regarding insurance claims and related mediation.	0.60	\$585.00
07/15/24	ERR	Review information regarding pending claims vis-a-vis insurance tender.	0.30	\$292.50
07/15/24	MDL	Evaluate clawback issue with respect to Exhibit A to complaint in insurance adversary proceeding.	0.70	\$560.00
07/15/24	MR	Communicate with A. Uetz regarding providing documentation to insurers' counsel per counsel's request (.2); review applicable rules and draft email communication to insurers regarding obligations with respect to highly confidential documents and privileged information (.8).	1.00	\$690.00
07/15/24	SJM	Prepare memo to A. Uetz regarding documents in insurance litigation.	1.50	\$1,125.00
07/16/24	AMUE	Finalize communication to counsel for insurers regarding action items following meet and confer (.5); review communication received from J. Daniels (.2); confer with Foley team regarding response to same (.3).	1.00	\$925.00
07/16/24	DMH	Analyze insurer coverage position letters from CNA and Chubb to update insurance coverage chart.	4.10	\$1,947.50
07/16/24	DMH	Analyze case law regarding various privileged matters, to assist in preparation of mediation statement.	0.90	\$427.50
07/16/24	EPM	Revise confidential insurance mediation statement (5.2); analysis of recent correspondence from defendant insurer (.4).	5.60	\$4,200.00
07/16/24	ERR	Edit email to insurers stemming from meet and confer regarding motion to dismiss.	0.30	\$292.50
07/16/24	ERR	Edit response to Chubb regarding claims materials.	0.50	\$487.50
07/16/24	MCM	Review draft insurance mediation statement and comments to same from Foley team.	0.50	\$412.50

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07/16/24	MR	Communicate with E. Mazzocco regarding draft of and exhibits to mediation statement in District Court insurance coverage action (.2); draft exhibit to mediation statement (1.1); revise draft mediation statement (.5).	1.80	\$1,242.00
07/17/24	DMH	Update insurance coverage tracker based on recent insurer coverage letters from CNA.	3.00	\$1,425.00
07/17/24	EPM	Internal email correspondence regarding status of ongoing work streams (.3); draft correspondence to insurer defendants (1.2); coordinate with litigation support regarding processing of defendant insurer document productions (.6).	2.10	\$1,575.00
07/18/24	DMH	Analyze discovery responses from insurers Westport and CNA to identify areas of deficiency and needing follow up.	3.20	\$1,520.00
07/18/24	DMH	Attend RCBO all-hands call to update on work streams and coordinate assignments (.8); prepare for call (.4).	1.20	\$570.00
07/18/24	EPM	Draft correspondence to defendant insurers (2.8); conference call with A. Uetz, E. Ridley, M. Lee, M. Moore, D. Habib, S. Moses, M. Rofaeil, and M. Roberts (.8); preparation for conference call (1.0).	4.60	\$3,450.00
07/18/24	ERR	Strategize regarding pending tasks regarding insurance claims including mediation, drafting of complaint and discovery responses.	1.00	\$975.00
07/18/24	MR	Draft document tracking incoming and outgoing written discovery and discovery responses.	0.30	\$207.00
07/18/24	SJM	Analyze Westport requests for production in order to identify issues for responses to same (1.2); email to M. Lee, M. Roberts, and E. Mazzocco regarding same (.3).	1.50	\$1,125.00
07/19/24	DMH	Attend strategy call with E. Mazzocco regarding reconciliation of RCBO's claims with issues raised by Chubb.	0.30	\$142.50
07/19/24	DMH	Analyze insurer discovery responses from Chubb insurers and Lloyd's to identify areas of deficiency and follow up.	2.70	\$1,282.50
07/19/24	EPM	Analysis of proofs of claim and insurance coverage periods.	1.10	\$825.00

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07/19/24	MCM	Conference call with E. Mazzocco regarding coverage issues (.4); follow-up call with E. Mazzocco and D. Habib regarding same and necessary analysis to respond to insurer inquiries (.6).	1.00	\$825.00
07/21/24	DMH	Analyze insurer discovery requests from Westport and Lloyd's to identify areas needing follow up and deficiencies.	2.10	\$997.50
07/21/24	ERR	Review status of insurer requests regarding amended complaint.	0.20	\$195.00
07/21/24	SJM	Work on responses to Westport first set of requests for production.	2.70	\$2,025.00
07/22/24	AMUE	Outline follow-up communications to insurers following meet and confer items including reconciliation of claims and coverage periods.	1.30	\$1,202.50
07/22/24	AMUE	Email communication with M. Lee regarding insurer-preferred language for claims assignment (.4); direct further communications with counsel for insurers regarding same (.3).	0.70	\$647.50
07/22/24	DMH	Analyze discovery responses served by insurers to RCBO's RFPs to identify areas of deficiency in responses, and areas requiring follow-up requests.	7.10	\$3,372.50
07/22/24	EPM	Conduct claim coverage analysis (.5); conference call with A. Uetz, M. Moore, M. Lee, and M. Kemner regarding case updates (.9); review status of open insurance coverage action items (.4); review draft discovery (.3); conference call with M. Roberts, M. Lee, and S. Moses regarding open discovery subjects (1.0); draft correspondence to insurance counsel (1.8).	4.90	\$3,675.00
07/22/24	ERR	Review issues regarding pending discovery responses to RCBO.	0.50	\$487.50
07/22/24	ERR	Revise responsive letter to insurers.	0.40	\$390.00
07/22/24	JCH	Prepare contact list of parties from July 16 meet and confer.	0.40	\$120.00
07/22/24	MDL	Telephone conference with Foley team (M. Roberts, E. Mazzocco, S. Moses) regarding responses to document requests from insurer defendants.	0.90	\$720.00

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07/22/24	MR	Attend strategy call with M. Lee, E. Mazzocco and S. Moses regarding written discovery in District Court insurance coverage action.	0.90	\$621.00
07/22/24	SJM	Meeting with M. Lee, E. Mazzocco, and M. Roberts to discuss approach to responses to written discovery from Westport.	0.90	\$675.00
07/23/24	AMUE	Meeting with E. Ridley, E. Mazzocco and D. Habib regarding post-distinct court hearing action items (partial).	1.00	\$925.00
07/23/24	DMH	Attend strategy call with RCBO insurance team E. Ridley, A. Uetz, M. Roberts, and E. Mazzocco to strategize approach for various upcoming insurance-related tasks.	1.20	\$570.00
07/23/24	DMH	Analyze discovery responses from Travelers, CNA, and Westport to identify areas of deficiency and responses requiring follow up.	8.50	\$4,037.50
07/23/24	EPM	Conference call with A. Uetz, E. Ridley, D. Habib, and M. Roberts regarding insurance coverage matters (1.3); preparation for conference call (1.5); draft correspondence to opposing counsel regarding insurance coverage matters (.4).	3.20	\$2,400.00
07/23/24	ERR	Review status of discovery responses, draft amended complaint and issues regarding response to insurer defendants.	1.20	\$1,170.00
07/23/24	MCM	Email correspondence with Foley team regarding insurance and coverage-related issues.	0.40	\$330.00
07/23/24	MDL	Email correspondence with S. Moses, E. Mazzocco, and M. Roberts regarding discovery already made to insurers for purposes of preparing responses to document requests.	0.30	\$240.00
07/23/24	MR	Attend strategy meeting regarding District Court insurance coverage action with E. Ridley, A. Uetz, E. Mazzocco and D. Habib.	1.20	\$828.00
07/23/24	SJM	Telephone call with P. Bongiovanni regarding information for response to Westport request for production (.4); email to K. Farrar regarding same (.1); revise responses to requests for production (.8); email to M. Roberts regarding status of responses (.2).	1.50	\$1,125.00

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07/24/24	DMH	Draft chart of insurers responsible for coverage by policy year.	2.00	\$950.00
07/24/24	DMH	Attend call with E. Mazzocco regarding reconciling claims for which insurer did not respond or improperly denied coverage.	0.80	\$380.00
07/24/24	DMH	Update insurance coverage chart based on recent insurer responses received from AIG.	0.70	\$332.50
07/24/24	DMH	Draft chart summarizing insurer discovery responses and highlighting deficiencies or areas for follow up.	2.30	\$1,092.50
07/24/24	EPM	Conference call with D. Habib regarding coverage analysis (.8); coverage analysis of claims (6.4).	7.20	\$5,400.00
07/24/24	ERR	Review drafts of discovery responses to insurers.	0.50	\$487.50
07/24/24	MR	Communicate with counsel for Westport regarding responses to requests for production in District Court insurance coverage action.	0.20	\$138.00
07/24/24	SJM	Email correspondence with insurance litigation team regarding responses to document discovery (.4); confer with E. Ridley regarding same (.1).	0.50	\$375.00
07/25/24	AMUE	Provide advice regarding claims reconciliation for purposes of responding to T. Schiavoni inquiry.	0.50	\$462.50
07/25/24	AMUE	Meeting with insurance team (E. Ridley, E. Mazzocco, D. Habib, M. Rofaeil) regarding next action items with insurers on discovery and amended complaint (.8); prepare for same (.2).	1.00	\$925.00
07/25/24	AMUE	Review insurance coverage chart update.	0.50	\$462.50
07/25/24	AMUE	Analyze draft insurance coverage drop down chart.	0.50	\$462.50
07/25/24	DMH	Revise insurance coverage chart based on recent insurer responses received from AIG and Chubb.	2.40	\$1,140.00
07/25/24	DMH	Attend call with E. Mazzocco and M. Moore regarding reconciliation of various claims on RCBO's Exhibit A (.8); prepare for call (1.1).	1.90	\$902.50
07/25/24	DMH	Attend RCBO team all-hands call to coordinate work streams and update pending tasks.	0.80	\$380.00

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07/25/24	EPM	Coverage analysis of insurance claims (6.8); conference call with M. Moore and D. Habib regarding coverage analysis (.8); conference call with A. Uetz, M. Lee, M. Moore, M. Roberts, M. Rofaail, and D. Habib regarding insurance coverage matters (.8).	8.40	\$6,300.00
07/25/24	ERR	Review status of amended complaint and discovery responses between RCBO and insurers.	1.00	\$975.00
07/25/24	MCM	Telephone conference with E. Mazzocco and D. Habib regarding insurer information requests concerning claims listed in complaint (.8); prepare for same (.2).	1.00	\$825.00
07/25/24	MDL	Telephone conference with Foley team regarding discovery and notice issues in adversary proceeding.	0.70	\$560.00
07/25/24	MR	Revise chart tracking insurers' responses to requests for production in District Court coverage action, and create preliminary list of key items to address with insurers during meet and confer.	1.60	\$1,104.00
07/26/24	DMH	Analyze insurer response letters from AIG to update insurance coverage chart accordingly.	2.20	\$1,045.00
07/26/24	DMH	Attend analysis call with E. Mazzocco to reconcile claims on Exhibit A to Complaint with issues raised by Chubb insurers.	1.00	\$475.00
07/26/24	EPM	Coverage analysis of insurance claims (2.7); draft summary of coverage analysis (3.7); draft correspondence to insurance counsel (.5).	6.90	\$5,175.00
07/26/24	ERR	Telephone call with J. Breall (RCBO insurer counsel) regarding amended complaints.	0.50	\$487.50
07/26/24	ERR	Review underlying complaints (.6) and begin drafting Fourth Amended Complaint (1.9).	2.50	\$2,437.50
07/26/24	ERR	Finalize drop down chart and forward to Committee coverage counsel.	0.50	\$487.50
07/26/24	ERR	Revise email to T. Schiavoni regarding pending claim questions.	0.50	\$487.50
07/26/24	MCM	Analyze draft email correspondence to insurer parties with related backup information.	0.50	\$412.50

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07/26/24	MR	Revise analysis of insurers' objections to requests for production, in advance of meet and confer call with all counsel.	0.30	\$207.00
07/29/24	DMH	Update insurance coverage chart based on recent insurer response letters received from AIG.	4.90	\$2,327.50
07/29/24	MR	Complete revised detailed analysis of objections to requests for production received from all insurers in District Court coverage action, and recommended next actions in relation to meet and confer call between all counsel.	1.60	\$1,104.00
07/29/24	SJM	Revise responses to Westport RFPs.	2.40	\$1,800.00
07/30/24	AMUE	Outline next action items following meet and confer with district court (1.0); outline requirements for revisions to amended complaint (.9).	1.90	\$1,757.50
07/30/24	DMH	Revise insurance coverage chart based on recent insurer response letters received from AIG and Chubb.	2.70	\$1,282.50
07/30/24	EPM	Review coverage analysis chart.	0.80	\$600.00
07/30/24	ERR	Revise response to RFP by Westport.	1.20	\$1,170.00
07/31/24	AMUE	Provide advice to M. Roberts regarding responses to certain insurer discovery requests.	0.60	\$555.00
07/31/24	EPM	Draft correspondence to insurance counsel.	1.20	\$900.00
07/31/24	ERR	Review additional edits to respond to RFP.	0.70	\$682.50
07/31/24	MCM	Review email correspondence with insurance team regarding adversary issues.	0.40	\$330.00
07/31/24	MR	Communicate with counsel for Westport regarding responses to Westport's requests for production.	0.10	\$69.00
07/31/24	SJM	Review comments from E. Ridley to Westport RFP responses (.7); email to K. Farrar regarding documents already produced (.3); emails with case team regarding extension of time to respond (.3).	1.30	\$975.00
Task Total:			244.00	\$171,233.00

032 Rule 2004 Motions/Discovery/Subpoenas

07/01/24	KAFA	Preparation of tags to identify priest file productions per priest (1.1); pull documents produced to the Committee for additional review per M. Lee (.2); prepare update on additional client documents for production to the Committee (.3).	1.60	\$632.00
07/02/24	EPK	Confer with K. Farrar regarding production of documents relating to restricted assets and cash substantiation (.5); review prior productions relating to restricted cash analyses (.2); email correspondence with P. Bongiovanni regarding same (.1); review restricted cash documentation index (.2).	1.00	\$800.00
07/02/24	KAFA	Prepare documents for production to the Committee (1.1); prepare cross reference index of restricted cash documentation produced to Committee with bates stamps, folder info and filename info (.8).	1.90	\$750.50
07/02/24	MDL	Provide instruction to M. Schachte and K. Farrar (Foley) regarding production to Committee.	0.20	\$160.00
07/02/24	MDL	Final review of documents to be produced to the Committee per BRG priority requests.	1.00	\$800.00
07/03/24	KAFA	Update document production tracking matrix.	0.20	\$79.00
07/08/24	EPK	Email correspondence with P. Bongiovanni regarding diligence requests relating to restricted/unrestricted cash substantiation analysis (.2); review restricted cash documents index and account listing prepared by VeraCruz team for privilege issues and format (.7); coordinate with K. Farrar and M. Schachte regarding further refinement of document index to be provided to the Committee's advisors (.7); update documents index and account listing to prepare same for sharing with the Committee's advisors (.4); confer with M. Lee regarding review and approval of same for distribution (.3).	2.30	\$1,840.00

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07/08/24	KAFA	Call with P. Bongiovanni to discuss production of restricted cash documentation to Committee and cross reference of file and folder names (.2); preparation of index of restricted cash productions (.2); continue to prepare documents received from client for production to Committee (.3).	0.70	\$276.50
07/09/24	EPK	Coordinate with M. Lee regarding supplemental documents relating to restricted cash to be provided to the Committee under the mediation privilege (.2); email to the Committee's advisors at Lowenstein and BRG to provide supplemental documents relating to restricted cash analysis (.2); follow up with P. Bongiovanni and D. Flanagan of VeraCruz regarding same (.2); review email to Judge Sontchi regarding supplemental documents provided to the Committee's advisors (.1).	0.70	\$560.00
07/09/24	MDL	Telephone conference with BRG and VeraCruz regarding BRG priority document and information requests.	0.30	\$240.00
07/10/24	KAFA	Continue to prepare documents received from client for production to Committee.	0.80	\$316.00
07/11/24	KAFA	Continue to prepare documents received from client for production to Committee.	0.40	\$158.00
07/12/24	KAFA	Continue to prepare documents received from client for production to Committee.	0.60	\$237.00
07/12/24	MDL	Analyze correspondence from P. Bongiovanni regarding collection of additional documents requested by BRG.	0.20	\$160.00
07/12/24	MDL	Provide instruction to K. Farrar and M. Schachte (both of Foley) regarding collection of additional documents requested by BRG.	0.30	\$240.00
07/16/24	KAFA	Continue to prepare documents received from client for production to Committee.	0.50	\$197.50
07/16/24	MDL	Evaluate scope of and need for review of additional College of Consultors and Finance Council-related documents requested by Committee.	0.30	\$240.00
07/16/24	MDL	Email correspondence with BRG regarding its request for historical Mass attendance data.	0.30	\$240.00

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07/17/24	KAFA	Continue to prepare documents received from client for production to Committee.	0.70	\$276.50
07/18/24	JSH	Review documents for production.	0.60	\$420.00
07/22/24	KAFA	Analysis of documents previously produced to the Committee but addressed in BRG 7/9/24 follow-up requests.	0.70	\$276.50
07/22/24	MDL	Email exchange with D. Flanagan (VeraCruz) regarding documents produced to BRG but which BRG claims it does not have.	0.10	\$80.00
07/22/24	MDL	Email exchange with K. Farrar and M. Schachte regarding documents produced to BRG but which BRG claims it does not have.	0.10	\$80.00
07/23/24	KAFA	Preparation of documents previously produced to the Committee but addressed in BRG 7/9/24 follow-up requests.	0.30	\$118.50
07/24/24	JSH	Review documents for production.	0.70	\$490.00
07/24/24	KAFA	Preparation of documents for production to the Committee.	1.20	\$474.00
07/25/24	KAFA	Preparation of documents for production to the Committee.	0.80	\$316.00
07/29/24	JSH	Review documents for production.	3.10	\$2,170.00
07/30/24	JSH	Review documents for production.	2.20	\$1,540.00
07/30/24	KAFA	Preparation of documents for production to the Committee.	0.30	\$118.50
07/31/24	JSH	Review documents for production (1.6); follow-up communications with M. Lee regarding the same (.2).	1.80	\$1,260.00
07/31/24	KAFA	Prepare summary of document productions for S. Moses for discovery responses.	1.60	\$632.00
		Task Total:	27.50	\$16,178.50

034 Other Motion Practice

07/17/24	SJM	Email to M. Lee regarding approach to removal deadline.	0.30	\$225.00
07/28/24	SJM	Draft motion to extend removal deadline (2.6); prepare notice and proposed order on motion (.3); prepare declaration of A. Bardos in support of motion (.3).	3.20	\$2,400.00
07/30/24	SJM	Further revision to motion to extend deadline for removal (.6); email to A. Bardos regarding same (.3).	0.90	\$675.00
07/31/24	JCH	File Third Motion to Extend Removal Deadline, Declaration and Notice of Hearing (.5); calendar response deadline regarding same (.1).	0.60	\$180.00
07/31/24	MDL	Revise motion to extend removal deadline and supporting declaration.	0.40	\$320.00
07/31/24	SJM	Revise motion to extend removal deadline based on comments from M. Lee (.3); finalize motion and support documents (.2).	0.50	\$375.00
		Task Total:	5.90	\$4,175.00

037 Financing

07/15/24	MDL	Analyze correspondence with RCC representatives regarding potential exit financing.	0.10	\$80.00
07/16/24	HMF	Conference call regarding exit financing.	1.20	\$1,200.00
07/16/24	JPWI	Prepare for call with RCC and counsel regarding potential loan transaction (2.0); participate on call with RCC and counsel regarding potential loan transaction (1.0) (partial).	3.00	\$2,400.00
07/16/24	MDL	Telephone conference with RCC personnel and counsel (R. Manns of Norton Rose) regarding possible exit financing.	1.20	\$960.00
07/22/24	MDL	Telephone conference with confidential appraisal expert regarding possible retention for support in obtaining exit financing.	0.70	\$560.00

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07/23/24	MDL	Telephone conference with confidential real estate appraiser to determine appropriate scope of work for exit financing appraisal support.	0.30	\$240.00
07/30/24	HMF	Conference call regarding potential additional loan from RCC (.8); correspondence regarding same (.2).	1.00	\$1,000.00
07/30/24	JPWI	Prepare for and participate on call regarding RCC loan.	1.00	\$800.00
07/31/24	HMF	Conference with R. Manns regarding new RCC loan (.5); prepare draft term sheet (1.2); correspondence regarding term sheet open items (.3).	2.00	\$2,000.00
07/31/24	JPWI	Review correspondence related to RCC loan and related term sheet.	0.20	\$160.00
		Task Total:	10.70	\$9,400.00

038 Mediation

07/01/24	MCM	Prepare for mediation meetings with Committee counsel on July 23.	0.50	\$412.50
07/01/24	MDL	Revise proposed outline on mediation statement in insurance coverage mediation.	0.30	\$240.00
07/02/24	MCM	Prepare for meetings on 7/23 with Committee counsel regarding mediation matters.	1.00	\$825.00
07/03/24	MCM	Conference call with Committee counsel and mediator regarding mediation issues (.8); finalize draft revised child-protection protocols for Committee review prior to next meetings (1.0); work on issues in connection with execution by insurance mediators of confidentiality agreements (.3).	2.10	\$1,732.50
07/03/24	MDL	Telephone conference with Judge Sontchi and Lowenstein (J. Prol, B. Weisenberg) regarding real estate valuation and non-debtor contribution issues.	0.80	\$640.00
07/05/24	MCM	Work on issues in connection with information sharing with insurance mediators and execution of necessary documents.	0.30	\$247.50

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07/06/24	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$570.00
07/08/24	AMUE	Meeting with M. Lee and M. Moore to strategize regarding privileged matters related to mediation.	1.20	\$1,110.00
07/08/24	AMUE	Identify confidential information to provide to T. Gallagher and Judge Newsome (.7); revise email communications related to same (.5).	1.20	\$1,110.00
07/08/24	MCM	Coordinate production of claim information to insurance mediators, Judge Newsome and T. Gallagher, following execution of confidentiality agreements.	0.50	\$412.50
07/08/24	MRL	Email correspondence with M. Lee and M. Moore regarding status of the Purdue decision on other pending diocese cases (.2); confer with M. Moore regarding the same (.1).	0.30	\$171.00
07/09/24	AMUE	Work on analysis of privileged issue related to mediation and child protection protocols.	1.20	\$1,110.00
07/09/24	AMUE	Meeting with M. Lee, M. Moore and E. Mazzocco regarding mediation statement (.5); identify information under separate cover to E. Mazzocco to assist in drafting same (.4).	0.90	\$832.50
07/09/24	MDL	Analyze documents prepared by VeraCruz regarding real property valuations to be shared with Committee under mediation privilege.	0.20	\$160.00
07/09/24	MDL	Evaluate Committee's confidential mediation demand relating to real estate.	0.30	\$240.00
07/09/24	MDL	Email correspondence with C. Sontchi regarding restricted funds analysis.	0.10	\$80.00
07/09/24	MDL	Email correspondence with Lowenstein and BRG regarding real estate valuation information.	0.20	\$160.00
07/09/24	MDL	Telephone conference with E. Mazzocco regarding mediation statement on insurance coverage litigation.	0.20	\$160.00
07/09/24	MDL	Email exchange with D. Flanagan (VeraCruz) regarding real property valuations to be shared with Committee.	0.40	\$320.00
07/10/24	AMUE	Meeting with B. Weisenberg and Judge Sontchi.	0.80	\$740.00

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07/10/24	MCM	Conference call with Committee mediator and Committee counsel regarding mediation matters and upcoming meetings with same.	1.00	\$825.00
07/12/24	MCM	Work on issues in connection with mediation meetings with Committee scheduled for July 23.	1.30	\$1,072.50
07/14/24	MRL	Review pending dioceses cases to provide an update on their status to client.	1.30	\$741.00
07/15/24	MCM	Analyze mediation statement in preparation for dissemination in insurance mediation (.6); prepare for continued meetings 7/23 (.5).	1.10	\$907.50
07/15/24	MDL	Revise confidential insurance mediation statement.	0.90	\$720.00
07/16/24	AMUE	Review strategy regarding property valuation to provide advice to client leadership regarding same.	0.80	\$740.00
07/16/24	AMUE	Final review of mediation statement to provide approval to send to mediators.	0.80	\$740.00
07/16/24	MCM	Email correspondence with Committee counsel regarding child protection protocol issues and meetings scheduled for July 23.	0.60	\$495.00
07/16/24	MRL	Email correspondence with M. Moore regarding the Syracuse docket.	0.20	\$114.00
07/17/24	MCM	Conference call with Committee counsel regarding mediation matters (1.0); prepare for follow-up meeting regarding child-protection protocols and related matters (1.0).	2.00	\$1,650.00
07/17/24	MDL	Participate in mediation session with Foley and Lowenstein attorneys.	1.10	\$880.00
07/18/24	AMUE	Analyze privileged issue concerning mediation related to real estate in order to provide client with advice regarding same.	2.40	\$2,220.00
07/18/24	MCM	Conference call with Committee counsel regarding mediation matters (1.0); follow-up work to prepare for meetings 7/23 (.5).	1.50	\$1,237.50
07/18/24	MDL	Participate in mediation session with Lowenstein and Foley attorneys (only attended part of meeting).	0.70	\$560.00

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07/19/24	AMUE	Review issue concerning real estate valuation in light of Committee position regarding valuation.	0.70	\$647.50
07/19/24	MCM	Prepare for July 23 meetings with Committee counsel and client parties.	0.60	\$495.00
07/21/24	MCM	Prepare for meetings on July 23 with Committee counsel and client parties.	0.80	\$660.00
07/21/24	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$570.00
07/22/24	AMUE	Communication with B. Weisenberg regarding proposed protocols (.3); communication with M. Kemner regarding same (.2).	0.50	\$462.50
07/22/24	MCM	Prepare for meetings on July 23 with Committee counsel and client parties.	0.80	\$660.00
07/22/24	MDL	Correspondence with T. Gallagher (mediator) regarding confidential mediation topic.	0.30	\$240.00
07/22/24	MDL	Email exchange with M. Kemner, A. Bardos, and V. Rosas regarding mediation schedule and Diocese personnel participation in same.	0.20	\$160.00
07/23/24	AMUE	Email communication with Judge Sontchi and Lowenstein team regarding mediation matters.	0.50	\$462.50
07/23/24	AMUE	Meeting with Judge Sontchi regarding upcoming mediation meetings.	0.80	\$740.00
07/23/24	MCM	Review responses to protocol issues from A. Uetz prior to conference call with Committee regarding mediation (.4); conference call with Committee counsel (.9); draft email debrief to A. Uetz and M. Lee (.3); conference call with mediator to discuss status of mediations and related issues (.7).	2.30	\$1,897.50
07/23/24	MDL	Telephone conference with C. Sontchi and Foley team (A. Uetz, M. Moore) regarding confidential mediation issues.	0.80	\$640.00
07/24/24	AMUE	Prepare for meeting with Lowenstein team regarding settlement negotiation concerning claims (1.3); participate in meeting with J. Prol, B. Weisenberg, M. Lee and M. Moore regarding same (1.0).	2.30	\$2,127.50

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07/24/24	MCM	Telephonic mediation conference with Committee counsel regarding case issues and scheduling for August in-person meetings in Chicago (1.0); follow-up email correspondence regarding same with Foley team and client parties (.5).	1.50	\$1,237.50
07/24/24	MDL	Prepare for mediation session with Committee attorneys.	0.20	\$160.00
07/24/24	MDL	Participate in mediation session with Committee counsel and Debtor's counsel.	0.90	\$720.00
07/26/24	MCM	Email correspondence with mediator, Foley team, and Committee counsel regarding August mediation setting.	0.40	\$330.00
07/26/24	MDL	Evaluate financial position of certain non-Debtor entities.	0.50	\$400.00
07/28/24	MCM	Email correspondence with mediator and Committee counsel regarding future mediation settings.	0.40	\$330.00
07/28/24	MRL	Review pending dioceses cases to provide an update on their status to client.	1.10	\$627.00
07/29/24	AMUE	Email communications (x2) with Judge Sontchi and Lowenstein regarding upcoming mediation.	0.40	\$370.00
07/29/24	AMUE	Analyze issue regarding real estate for purposes of mediation.	0.80	\$740.00
07/29/24	MCM	Email correspondence regarding August mediation and strategy for same.	0.30	\$247.50
07/29/24	MRL	Email correspondence with J. Harrison regarding mediation dates to provide an update to the Foley team.	0.20	\$114.00
07/30/24	AMUE	Email communications with Judge Sontchi and Lowenstein team regarding mediation (x2).	0.40	\$370.00
07/30/24	MCM	Analyze issues regarding mediation positions (.8); draft email memorandum to A. Uetz regarding same to prepare for August mediation meetings with Committee (.6).	1.40	\$1,155.00

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07/31/24	MCM	Prepare for August mediation meetings.	0.60	\$495.00
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Task Total:	49.90	\$41,234.50
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Services Total:	644.30	\$482,778.50
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Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Elizabeth P. Mazzocco	EPM	Associate	80.00	\$750.00	\$60,000.00
Joseph S. Harper	JSH	Associate	11.40	\$700.00	\$7,980.00
Mason Roberts	MR	Associate	16.80	\$690.00	\$11,592.00
Mary Rofaeil	MRL	Associate	24.20	\$570.00	\$13,794.00
Mikaela R. Mitcham	MRM	Associate	6.00	\$570.00	\$3,420.00
Shane J. Moses	SJM	Of Counsel	87.00	\$750.00	\$65,250.00
Janelle C. Harrison	JCH	Paralegal	19.20	\$300.00	\$5,760.00
Kerry A. Farrar	KAFA	Paralegal	13.50	\$395.00	\$5,332.50
Ann Marie Uetz	AMUE	Partner	85.00	\$925.00	\$78,625.00
Emil P. Khatchatourian	EPK	Partner	21.40	\$800.00	\$17,120.00
Eileen R. Ridley	ERR	Partner	33.10	\$975.00	\$32,272.50
Heidi M. Furlong	HMF	Partner	4.20	\$1,000.00	\$4,200.00
Jason J. Kohout	JJK	Partner	1.50	\$875.00	\$1,312.50
Jonathan P. Witt	JPWI	Partner	4.70	\$800.00	\$3,760.00
Jeff R. Blease	JRBL	Partner	5.00	\$1,275.00	\$6,375.00
Mark C. Moore	MCM	Partner	95.20	\$825.00	\$78,540.00
Matthew D. Lee	MDL	Partner	46.60	\$800.00	\$37,280.00
Mark T. Schieble	MTSC	Partner	3.70	\$1,150.00	\$4,255.00
Thomas F. Carlucci	TFCA	Partner	3.30	\$1,325.00	\$4,372.50
Robert T. Stewart	RTST	Senior Counsel	1.60	\$740.00	\$1,184.00
Daniyal M. Habib	DMH	Special Counsel	73.00	\$475.00	\$34,675.00
Tamar N. Dolcourt	TND	Special Counsel	7.50	\$735.00	\$5,512.50
Kevin T. Lewman	KTLE	Technical Specialist	0.40	\$415.00	\$166.00
Totals			644.30		\$482,778.50

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$417.70
LSS - eDiscovery Services	\$3,700.00
Meals	\$1,432.58
Recording / Filing Fees	\$16.00
Shipping Charges	\$35.36
Shipping/courier/messenger services	\$217.50
Transportation / Travel Expenses	\$2,076.61
Expenses Incurred Total	\$7,895.75

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

Electronic Legal Research Services

Date	Initials	Description	Amount
07/31/24	DMH	Westlaw. Docket Report. DOCKET REPORT.	\$417.70

LSS - eDiscovery Services

Date	Initials	Description	Amount
07/31/24	JRBL	LSS - eDiscovery Services.	\$3,700.00

Meals

Date	Initials	Description	Amount
06/05/24	MG	Lunch--VENDOR: U.S. BANK 06/05/24 during RCBO meeting with parties (5 attendees).	\$112.70
06/17/24	ASD	Lunch--VENDOR: U.S. BANK 06/18/24 Lunch for RCBO mediation for parties and mediator (22 attendees).	\$398.20
06/17/24	ASD	Lunch--VENDOR: U.S. BANK 06/18/24 Lunch for RCBO mediation for parties and mediator (add-on; 22 attendees).	\$32.33

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06/17/24	ASD	Lunch--VENDOR: U.S. BANK 06/19/24 Lunch for RCBO mediation for parties and mediator (21 attendees).	\$430.53
06/18/24	ASD	Breakfast--VENDOR: U.S. BANK 06/18/24 Breakfast for RCBO mediation for parties and mediator (22 attendees).	\$229.41
06/19/24	ASD	Breakfast--VENDOR: U.S. BANK 06/19/24 Breakfast for RCBO mediation for parties and mediator (21 attendees).	\$229.41
			\$1,432.58

Recording / Filing Fees

Date	Initials	Description	Amount
07/10/24	JRBL	Recording/Filing Fees--VENDOR: U.S. BANK 07/10/24 Court Filing -.	\$16.00

Shipping Charges

Date	Initials	Description	Amount
07/31/24	MBA	Federal Express Invoice: 856225350; Tracking: 276880203081; Sender: Mirvette Badal; Recipient: Elizabeth Mazzocco Foley & Lardner LLP 321 N Clark Street CHICAGO IL 60654 US.	\$35.36

Shipping/courier/messenger services

Date	Initials	Description	Amount
07/19/24	JRBL	ACE ATTORNEY SERVICE, INC. - SDCA - Delivery Service - 07/19/24.	\$217.50

Transportation / Travel Expenses

Date	Initials	Description	Amount
06/06/24	AMUE	Taxi/Car Service--VENDOR: Ann Marie Uetz - Meetings in Chicago office regarding RCBO - 06/06/24-06/07/24.	\$38.78
06/07/24	AMUE	Hotel - Parking--VENDOR: Ann Marie Uetz - Meetings in Chicago office regarding RCBO - 06/06/24-06/07/24.	\$249.00
06/07/24	AMUE	Lodging--VENDOR: Ann Marie Uetz - Meetings in Chicago office regarding RCBO - 06/06/24-06/07/24.	\$1,788.83
			\$2,076.61

Expense Total:	\$7,895.75
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