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*Counsel for the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION**

*In re:*  
  
 THE ROMAN CATHOLIC BISHOP OF  
 OAKLAND, a California corporation sole,  
  
 Debtor.

Case No. 23-40523 WJL  
  
 Chapter 11  
  
**MONTHLY PROFESSIONAL FEE  
 STATEMENT FOR BURNS BAIR LLP  
 [AUGUST 2024]**

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

1           **NOTICE IS HEREBY GIVEN** that Burns Bair LLP (“**Burns Bair**”), special insurance  
2 counsel to The Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman  
3 Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement  
4 for the Period of August 1, 2024 through August 31, 2024 (the “**Monthly Fee Statement**”).  
5 Pursuant to the Order Authorizing Procedures for Interim Compensation and Reimbursement of  
6 Expenses of Professionals [Dkt. 170] (the “**Interim Fee Order**”)<sup>1</sup> entered by the Court on June  
7 23, 2023, the total legal fees and costs expended by Burns Bair on account of the Committee is as  
8 follows:

Period	Fees	Expenses	Total
August 1, 2024 through August 31, 2024	\$79,348.00	\$1,283.02	\$80,631.02
Net Total Allowed Payments this Statement Period: (80% of Fees and 100% of Costs)	\$63,478.40	\$1,283.02	\$64,761.42

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

22 Dated: September 30, 2024

**BURNS BAIR LLP**

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

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

# **Exhibit A**

# Burns | Bair

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

**The Roman Catholic Bishop of Oakland UCC**

**Issue Date :** 9/27/2024

**Bill # :** 01533

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/26/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re presentation re mediation and insurance strategy (1.8);	1.80	\$1,620.00
8/26/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes re Committee mediation strategy (1.8);	1.80	\$2,016.00
<b>Totals for Committee Meetings</b>			<b>3.60</b>	<b>\$3,636.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/15/2024	Jesse Bair	Review the fee examiner's consolidated final report (.1);	0.10	\$90.00
8/20/2024	Jesse Bair	Correspond with G. Albert re interim fee hearing (.1);	0.10	\$90.00
8/21/2024	Jesse Bair	Prepare for interim fee hearing (.5);	0.50	\$450.00
8/21/2024	Jesse Bair	Participate in hearing re interim fee applications (1.3);	1.30	\$1,170.00
8/24/2024	Jesse Bair	Review draft order granting interim professional applications (.1): correspond with G. Albert re same (.1);	0.20	\$180.00
8/29/2024	Jesse Bair	Review Burns Bair invoice for privilege and confidential information (.9);	0.90	\$810.00
8/29/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
8/29/2024	Jesse Bair	Review and edit monthly fee submission (.1); review and respond to correspondence with G. Albert and B. Horn-Edwards re same (.1);	0.20	\$180.00
<b>Totals for Fee Applications</b>			<b>3.60</b>	<b>\$3,072.00</b>

## Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/29/2024	Jesse Bair	Participate in case management conference in the insurance district court proceeding (.4);	0.40	\$360.00
<b>Totals for Hearings</b>			<b>0.40</b>	<b>\$360.00</b>

## Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/1/2024	Jesse Bair	Review the debtor's analysis re excess policy drop down obligations (.2); review and respond to correspondence with A. Castro re additional analysis needed in connection with same (.2);	0.40	\$360.00
8/1/2024	Alexander Castro	Supplemental analysis re excess drop-down issues, with particular focus on coverage correspondence concerning same and specific policy provisions regarding defense costs (1.7);	1.70	\$799.00
8/1/2024	Jesse Bair	Review and respond to correspondence with the debtor re discrepancies between the debtor and Committee demand letter claims lists (.2);	0.20	\$180.00
8/2/2024	Jesse Bair	Provide instructions to M. Stippel re research needed re all-sums with stacking allocation approach (.1);	0.10	\$90.00
8/2/2024	Timothy Burns	Review and respond to J. Bair correspondence re insurance allocation issues (.1);	0.10	\$112.00
8/5/2024	Jesse Bair	Review correspondence with state court counsel re potential test cases (.1);	0.10	\$90.00
8/5/2024	Timothy Burns	Participate in call with state court counsel re case insurance strategy (.4);	0.40	\$448.00
8/5/2024	Timothy Burns	Review and respond to correspondence with state court counsel re Committee insurance strategy (.2);	0.20	\$224.00
8/6/2024	Jesse Bair	Participate in portion of call with state court counsel and T. Burns re insurance strategy and next-steps (.3);	0.30	\$270.00
8/6/2024	Jesse Bair	Review debtor correspondence re discovery meet and confer with the insurers (.1);	0.10	\$90.00
8/6/2024	Morgan Stippel	Begin legal research re California's application of all sums with stacking approach in sexual abuse cases (1.0);	1.00	\$550.00

8/6/2024	Timothy Burns	Participate in call with state court counsel and J. Bair re case insurance strategy and next-steps in connection with same (.4);	0.40	\$448.00
8/7/2024	Morgan Stippel	Continue legal research re: California's application of all sums with stacking approach in sexual abuse cases (1.5);	1.50	\$825.00
8/7/2024	Jesse Bair	Review CNA's response to the Committee's demand letter (.1); review US Fire's response to same (.1);	0.20	\$180.00
8/7/2024	Jesse Bair	Participate in meet and confer with the debtor and the insurers re potential tolling agreement (.3);	0.30	\$270.00
8/8/2024	Jesse Bair	Participate in meet and confer with the insurers and the debtor re adversary proceeding insurance discovery (1.3);	1.30	\$1,170.00
8/8/2024	Morgan Stippel	Complete legal research re California's application of all sums with stacking approach in sexual abuse cases (1.4);	1.40	\$770.00
8/9/2024	Timothy Burns	Participate in conference with J. Bair re case insurance strategy and related projects (.1);	0.10	\$112.00
8/9/2024	Timothy Burns	Participate in call with B. Weisenberg and J. Bair re mediation strategy and preparations for upcoming session (.3);	0.30	\$336.00
8/9/2024	Jesse Bair	Participate in conference with B. Cawley re project re Chubb unfair claims practices (.1);	0.10	\$90.00
8/9/2024	Morgan Stippel	Finish drafting memorandum summarizing research re California's application of all sums with stacking approach in sexual abuse cases (1.5);	1.50	\$825.00
8/9/2024	Jesse Bair	Participate in conference with T. Burns re case insurance strategy and related projects (.1);	0.10	\$90.00
8/9/2024	Jesse Bair	Participate in call with B. Wiesenberg and T. Burns re strategy and preparations in connection with upcoming mediation session (.3);	0.30	\$270.00
8/11/2024	Jesse Bair	Review Westport's response to the Committee's demand letters (.2); review Travelers' response to same (.1); draft outline of potential Committee replies to same (.2);	0.50	\$450.00
8/11/2024	Jesse Bair	Review AIG's response to the Committee's insurance demand letter (.1); review Chubb's response to same (.2); review LMI's response to same (.1);	0.40	\$360.00
8/12/2024	Jesse Bair	Participate in meet and confer with the debtor and insurers re amendments to the insurance complaint (.2); participate in post-meeting call with T. Burns re outcome of same and next-steps (.1);	0.30	\$270.00

8/12/2024	Timothy Burns	Participate in conference with J. Bair re strategy and preparations for upcoming mediation session (.2);	0.20	\$224.00
8/12/2024	Jesse Bair	Review and respond to correspondence with Lowenstein and T. Burns re insurance protective order issues and upcoming case status conference in the insurance action (.1);	0.10	\$90.00
8/12/2024	Timothy Burns	Review correspondence with Lowenstein re insurance protective order issues and discussions with debtor re same (.2);	0.20	\$224.00
8/12/2024	Timothy Burns	Meet and confer with insurers and debtor re amended complaint (.2); met with J. Bair re same (.1);	0.30	\$336.00
8/12/2024	Nathan Kuenzi	Review current draft of Fourth Amended Complaint (.3); correspond with T. Burns and J. Bair re same (.1);	0.40	\$220.00
8/12/2024	Jesse Bair	Conference with T. Burns re mediation preparations and strategy for upcoming session (.2);	0.20	\$180.00
8/12/2024	Timothy Burns	Review and respond to J. Prol correspondence re insurance case management conference (.2);	0.20	\$224.00
8/13/2024	Jesse Bair	Participate in portion of full-day mediation session (5.5);	5.50	\$4,950.00
8/13/2024	Timothy Burns	Participate in portion of full-day mediation session (5.4);	5.40	\$6,048.00
8/13/2024	Timothy Burns	Prepare for mediation session (.7);	0.70	\$784.00
8/14/2024	Jesse Bair	Review correspondence with Committee professionals re upcoming mediation sessions and preparations in connection with same (.1);	0.10	\$90.00
8/14/2024	Timothy Burns	Review correspondence from Lowenstein re case mediation issues (.1);	0.10	\$112.00
8/15/2024	Jesse Bair	Review and respond to correspondence with the debtor and insurers re meet and confer re protective order issues and other insurance adversary proceeding issues (.1);	0.10	\$90.00
8/16/2024	Jesse Bair	Review and respond to correspondence with the debtor and mediator re upcoming mediation sessions (.1);	0.10	\$90.00
8/16/2024	Jesse Bair	Review correspondence with Committee professionals, state court counsel, and the Committee re mediation and settlement strategy (.1);	0.10	\$90.00
8/18/2024	Jesse Bair	Review additional correspondence with the debtor, mediator, and Committee professionals re upcoming mediation sessions (.1);	0.10	\$90.00

8/19/2024	Jesse Bair	Review and respond to correspondence with the debtor, mediator, and Committee professionals re upcoming mediation sessions (.1); correspond with B. Wiesenbergs re meeting to discuss insurance mediation strategy and preparations (.1);	0.20	\$180.00
8/20/2024	Jesse Bair	Review and respond to correspondence with B. Weisenberg and Committee professionals re preparations for mediation strategy presentation to the Committee (.1);	0.10	\$90.00
8/20/2024	Nathan Kuenzi	Participate in team meeting re case strategy, developments, and ongoing insurance projects (.1);	0.10	\$55.00
8/20/2024	Jesse Bair	Review correspondence with the mediator, debtor, and Committee professionals re upcoming mediation sessions (.1);	0.10	\$90.00
8/20/2024	Brian Cawley	Research California cases involving insured assignment and covenant not to execute before trial (1.6);	1.60	\$880.00
8/20/2024	Jesse Bair	Participate in BB team conference re case developments, next-steps, and overall Committee insurance strategy (.1);	0.10	\$90.00
8/20/2024	Jesse Bair	Review A. Castro memo re all carrier coverage defenses asserted to date (.2);	0.20	\$180.00
8/21/2024	Jesse Bair	Supplemental analysis of insurer exposures under different scenarios in connection with mediation strategy presentation (.3); review and respond to correspondence with Stout re same (.1);	0.40	\$360.00
8/21/2024	Jesse Bair	Prepare for call with Lowenstein and Stout re mediation strategy presentation (.1); participate in call with Lowenstein and Stout re same (.7);	0.80	\$720.00
8/21/2024	Jesse Bair	Review additional correspondence with the debtor, mediator, and Committee professionals re upcoming mediation sessions (.1);	0.10	\$90.00
8/21/2024	Brian Cawley	Continue researching case law related to insured assignment and covenant not to execute before trial (1.9);	1.90	\$1,045.00
8/21/2024	Brian Cawley	Draft memo summarizing research re insured assignment and covenant not to execute before trial (1.8);	1.80	\$990.00
8/21/2024	Jesse Bair	Participate in meet and confer with the insurers and debtor re insurance protective order issues (.7); follow-up correspondence with J. Prol re same and case discovery plan (.1);	0.80	\$720.00



8/22/2024	Jesse Bair	Continue analyzing insurer exposure figures in light of past settlement recoveries to inform potential revised Committee insurer demands (.9); draft spreadsheet summarizing analysis (.3);	1.20	\$1,080.00
8/22/2024	Jesse Bair	Review transcript of the July 11 motion to dismiss hearing before Judge Corley to inform revisions to Fourth Amended Complaint and ongoing discovery negotiations with the insurers (.6);	0.60	\$540.00
8/22/2024	Jesse Bair	Provide instructions to N. Kuenzi re additional analysis needed in connection with carrier claim count figures (.1);	0.10	\$90.00
8/22/2024	Jesse Bair	Review further revised claim valuation figures from Stout (.3); review and respond to correspondence with Stout and Lowenstein re same and analysis re potential revised Committee insurance demands (.2);	0.50	\$450.00
8/22/2024	Jesse Bair	Review the Committee's intervention order (.1); provide instructions to M. Stippel re research needed in connection with same and potentially expanding scope of the Committee's intervention in the insurance district court action (.3);	0.40	\$360.00
8/22/2024	Brian Cawley	Finish legal research and factual analysis re potential unfair claims handling practices of Chubb (1.9);	1.90	\$1,045.00
8/22/2024	Morgan Stippel	Begin legal research re potential expansion of Committee intervention rights in the insurance adversary proceeding (.7);	0.70	\$385.00
8/22/2024	Morgan Stippel	Participate in conference with J. Bair re research needed in connection with Committee intervention and potentially expanding scope of the Committee's intervention in the insurance district court action (.3);	0.30	\$165.00
8/22/2024	Nathan Kuenzi	Detailed, supplemental analysis re claims data and draft comparison of unique survivor claims by insurance company to develop revised carrier claim counts (4.4);	4.40	\$2,420.00
8/22/2024	Jesse Bair	Begin reviewing draft Fourth Amended Complaint exemplars circulated by the debtor (.3); correspond with the debtor re same and related meet and confer (.1);	0.40	\$360.00
8/22/2024	Jesse Bair	Draft email memo summarizing analysis and recommendation re potential revised Committee insurance demands (.6);	0.60	\$540.00
8/22/2024	Brian Cawley	Draft memo summarizing research re unfair claims handling practices of Chubb and potential causes of action re same (1.9);	1.90	\$1,045.00

8/23/2024	Timothy Burns	Participate in call with J. Prol and J. Bair re state court counsel meeting and insurance mediation strategy in connection with same (.8);	0.80	\$896.00
8/23/2024	Jesse Bair	Correspond with N. Kuenzi re carrier policy limit issue (.1);	0.10	\$90.00
8/23/2024	Timothy Burns	Review Stout's revised valuation analysis and related email from K. McNally (.3);	0.30	\$336.00
8/23/2024	Jesse Bair	Begin drafting Committee inserts for insurance case management statement (.3); review and respond to correspondence with T. Burns re same (.2); review and respond to correspondence with the debtor re same (.2);	0.70	\$630.00
8/23/2024	Timothy Burns	Participate in call with state court counsel re case insurance strategy and presentation re same at upcoming state court counsel meeting (.4);	0.40	\$448.00
8/23/2024	Jesse Bair	Analysis re potential discovery plan provisions and format (.2); correspond with the debtor re same (.1);	0.30	\$270.00
8/23/2024	Timothy Burns	Review and revise case management draft report in insurance adversary proceeding (.6);	0.60	\$672.00
8/23/2024	Jesse Bair	Participate in portion of call with state court counsel and T. Burns re Committee insurance and Plan strategy (.2); participate in portion of call with Lowenstein and T. Burns re same (.4);	0.60	\$540.00
8/23/2024	Jesse Bair	Prepare for meet and confer with the insurers re joint case management statement and discovery plan (.4); participate in meet and confer with the debtor and insurers re same (.5); participate in post-meeting call with J. Prol re outcome of same and next-steps (.1);	1.00	\$900.00
8/23/2024	Jesse Bair	Brief review re other insurance provisions and no voluntary payment provisions in connection with case insurance strategy (.2); participate in call with T. Burns re same (.1);	0.30	\$270.00
8/23/2024	Morgan Stippel	Complete legal research re potential expansion of the Committee's intervention rights in the insurance adversary proceeding (3.3); draft email memo summarizing research results (.6);	3.90	\$2,145.00
8/23/2024	Timothy Burns	Participate in conference with J. Bair re other insurance provisions and no voluntary payment provisions in connection with case insurance strategy (.1); prepare for upcoming state court counsel meeting re Committee mediation strategy (.4);	0.50	\$560.00

8/24/2024	Jesse Bair	Review correspondence with the debtor and the insurers re case management statement and discovery plan issues (.1);	0.10	\$90.00
8/24/2024	Jesse Bair	Review and respond to correspondence with Lowenstein and Stout re presentation and preparation re mediation strategy for upcoming state court counsel meeting (.2);	0.20	\$180.00
8/25/2024	Jesse Bair	Draft email memo to Committee professionals and Stout re insurer exposure and settlement analyses in connection with upcoming presentation to the Committee and state court counsel (.2); review and respond to correspondence with Committee professionals and Stout re CIGA issues in connection with same (.2);	0.40	\$360.00
8/25/2024	Timothy Burns	Detailed review of research memos re various aspects of California insurance law to factor into coverage analysis and to prepare for presentation to state court counsel on Committee insurance mediation strategy (3.3); participate in call with J. Bair re insurance strategy and potential Plan structures in connection with upcoming mediation strategy presentation to the Committee and state court counsel (.3);	3.60	\$4,032.00
8/25/2024	Brian Cawley	Respond to T. Burns request regarding insured settlement research (.4);	0.40	\$220.00
8/25/2024	Jesse Bair	Participate in call with T. Burns re insurance strategy and potential Plan structures in connection with upcoming mediation strategy presentation to the Committee and state court counsel (.3);	0.30	\$270.00
8/25/2024	Jesse Bair	Review and respond to correspondence with Stout re uninsured claim exposure (.1);	0.10	\$90.00
8/26/2024	Jesse Bair	Correspond with K. Dempski re upcoming insurance case management hearing (.1);	0.10	\$90.00
8/26/2024	Jesse Bair	Participate in conference with T. Burns re preparations for mediation strategy presentation to state court counsel (.2);	0.20	\$180.00
8/26/2024	Timothy Burns	Continue preparing mediation insurance presentation for upcoming state court counsel meeting (.4); participate in conference with J. Bair re same (.2);	0.60	\$672.00
8/27/2024	Jesse Bair	Draft email memo to state court counsel re Committee insurance strategy (.4);	0.40	\$360.00
8/27/2024	Jesse Bair	Review and respond to various correspondence with Lowenstein and the insurers re revised protective order negotiations (.3); review revised protective order (.2);	0.50	\$450.00

8/27/2024	Timothy Burns	Review revised version of the insurance case management statement (.2); review revised version of the insurance protective order (.2); review and respond to various correspondence with the debtor, insurers, and Committee professionals re same (.2);	0.60	\$672.00
8/27/2024	Jesse Bair	Draft Committee sections of the parties' revised joint case management statement (1.8); correspond with Committee professionals re same (.1); correspond with the debtor and insurers re same (.1);	2.00	\$1,800.00
8/27/2024	Jesse Bair	Correspond with Lowenstein re meet and confer with the debtors and insurers re case management statement and protective order issues (.1);	0.10	\$90.00
8/27/2024	Jesse Bair	Draft amended Committee sections for further revised version of the parties' joint case management statement (.3); review and respond to correspondence with the debtor re same (.1); review and respond to correspondence with Lowenstein re same (.1);	0.50	\$450.00
8/28/2024	Nathan Kuenzi	Participate in conference with T. Burns re consent to settle provisions and research project in connection with same (.2);	0.20	\$110.00
8/28/2024	Timothy Burns	Legal research and analysis re California no voluntary payment provision case law and its impact on settlement and plan design (.9);	0.90	\$1,008.00
8/28/2024	Timothy Burns	Participate in conference with N. Kuenzi re consent to settle provisions and research project in connection with same (.2); participate in conference with A. Castro re research project re insurance assignment structures in confirmed Plans (.2);	0.40	\$448.00
8/28/2024	Alexander Castro	Participate in conference with T. Burns re research project re insurance assignments under confirmed Plans (.2); research particular structures of insurance assignments in confirmed Plans under California law (.5);	0.70	\$329.00
8/28/2024	Timothy Burns	Analysis re insurance strategy for potential Plan of Reorganization (.8);	0.80	\$896.00
8/28/2024	Timothy Burns	Review materials re past insurance recoveries in Diocesan cases (.2);	0.20	\$224.00
8/28/2024	Jesse Bair	Correspond with J. Prol re upcoming status hearing in the insurance district court action (.1);	0.10	\$90.00
8/29/2024	Nathan Kuenzi	Begin detailed analysis re all consent to settle provisions in RCBO policies (1.3);	1.30	\$715.00

8/29/2024	Morgan Stippel	Begin supplemental research project re particular aspects of no voluntary payment provisions under California law and potential impact of diocese settlement/assignment on overall insurance coverage (.5);	0.50	\$275.00
8/29/2024	Jesse Bair	Review minute order from insurance case management conference (.1); correspond with Lowenstein re outcome of case management conference (.1);	0.20	\$180.00
8/29/2024	Alexander Castro	Analyze PG&E Plan materials in connection with potential Plan structure (.6);	0.60	\$282.00
8/29/2024	Alexander Castro	Research regarding particular requirements for effective insurance demand letters under California law (1.8);	1.80	\$846.00
8/29/2024	Jesse Bair	Correspond with the debtor re the Fourth Amended Complaint (.1);	0.10	\$90.00
8/29/2024	Brian Cawley	Review and respond to T. Burns' requests re research re pass-through Plan structures (.4);	0.40	\$220.00
8/29/2024	Timothy Burns	Continue legal research and analysis re California no voluntary payment provision case law and its impact on settlement and plan design (1.6); participate in conference with J. Bair re potential insurance Plan structures (.1);	1.70	\$1,904.00
8/29/2024	Brian Cawley	Begin supplemental research re consequences of breach of no voluntary payments provisions under California law (.6);	0.60	\$330.00
8/29/2024	Jesse Bair	Review revised proposed protective order in the insurance district court action (.1); review proof of claim order in the bankruptcy court re notice requirement to survivors re protective order amendments (.1); correspond with Lowenstein re same (.1); draft email memo to state court counsel re amended insurance protective order (.2);	0.50	\$450.00
8/29/2024	Jesse Bair	Participate in conference with T. Burns re potential insurance Plan structures (.1);	0.10	\$90.00
8/29/2024	Jesse Bair	Prepare for insurance status conference hearing (.5);	0.50	\$450.00
8/30/2024	Nathan Kuenzi	Draft chart of consent to settle provisions in Oakland policies for review of T. Burns (1.3);	1.30	\$715.00
8/30/2024	Brian Cawley	Continue supplemental research re consequences of breach of no voluntary payments provisions under California law (1.9);	1.90	\$1,045.00
8/30/2024	Timothy Burns	Additional, delated legal research and analysis re California no voluntary payment provision case law and its impact on settlement and plan design (1.9);	1.90	\$2,128.00

8/30/2024	Morgan Stippel	Continue supplemental research project re particular aspects of no voluntary payment provisions under California law and potential impact of diocese settlement/assignment on overall insurance coverage (1.4);	1.40	\$770.00
8/30/2024	Alexander Castro	Continue analyzing PG&E Plan materials in connection with potential Plan issues in this case (.7);	0.70	\$329.00
8/30/2024	Alexander Castro	Continue research regarding particular requirements for effective insurance demand letters under California law (1.2);	1.20	\$564.00
8/30/2024	Jesse Bair	Review final version of revised protective order and correspond with Lowenstein re service of same on survivor counsel (.1);	0.10	\$90.00
8/30/2024	Nathan Kuenzi	Finish detailed analysis re all consent to settle provisions in RCBO policies (2.0);	2.00	\$1,100.00
8/30/2024	Alexander Castro	Draft email summarizing research results re particular requirements for effective insurance demand letters under California law (1.2);	1.20	\$564.00
8/31/2024	Timothy Burns	Continue detailed legal research and analysis re California no voluntary payment provision case law and its impact on settlement and plan design (.7);	0.70	\$784.00
<b>Totals for Insurance Recovery Activities</b>			<b>91.90</b>	<b>\$72,280.00</b>

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**Total Hours and Fees** **99.50** **\$79,348.00**

**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/12/2024	Mileage to mediation in Chicago;	\$196.98
08/12/2024	Travel meal, T. Burns and J. Bair	\$91.32
08/12/2024	Hotel, J. Bair (1 night)	\$497.36
08/12/2024	Hotel, T. Burns (1 night)	\$497.36
<b>Total Expenses</b>		<b>\$1,283.02</b>

**Timekeeper Summary**

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	7.90	\$470.00	\$3,713.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	12.40	\$550.00	\$6,820.00
Jesse Bair	Partner	32.60	\$900.00	\$29,340.00
Morgan Stippel	Associate	12.20	\$550.00	\$6,710.00
Nathan Kuenzi	Associate	9.70	\$550.00	\$5,335.00
Timothy Burns	Partner	24.40	\$1,120.00	\$27,328.00