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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  
[JANUARY 2025]**

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

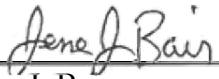
1           **NOTICE IS HEREBY GIVEN** that Burns Bair LLP (“**Burns Bair**”), special insurance  
2 counsel to The Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman  
3 Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement  
4 for the Period of January 1, 2025 through January 31, 2025 (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
January 1, 2025 through January 31, 2025	\$175,402.00	\$7,644.33	\$183,046.33
Net Total Allowed Payments this Statement Period: (80% of Fees and 100% of Costs)	\$140,321.60	\$7,644.33	\$147,965.93

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

21 Dated: February 28, 2025

**BURNS BAIR LLP**

22 By:   
23 Jesse J. Bair  
24 *Special Insurance Counsel for the Official*  
25 *Committee of Unsecured Creditors*  
26  
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 :** 2/28/2025

**Bill # :** 01851

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
1/6/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re preparation and strategy for lift stay hearing (.6);	0.60	\$540.00
1/10/2025	Timothy Burns	Participate in Committee meeting for insurance purposes (1.2);	1.20	\$1,344.00
1/10/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re outcome of recent hearing, upcoming amended disclosure statement hearing, and other ongoing case issues (1.2);	1.20	\$1,080.00
1/31/2025	Jesse Bair	Prepare for Committee meeting (.2); participate in Committee meeting for insurance purposes re Plan and disclosure statement issues and upcoming mediation session (1.3);	1.50	\$1,350.00
<b>Totals for Committee Meetings</b>			<b>4.50</b>	<b>\$4,314.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
1/30/2025	Brenda Horn-Edwards	Draft monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
1/30/2025	Jesse Bair	Review and edit Burns Bair monthly fee statement (.1); correspond with G. Albert and B. Horn-Edwards re same (.1);	0.20	\$180.00
<b>Totals for Fee Applications</b>			<b>0.50</b>	<b>\$282.00</b>

### Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
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1/8/2025	Jesse Bair	Participate in omnibus hearing for insurance purposes re the Committee's motion to lift stay and motion for derivative standing to prosecute the insurance claim (3.8); participate in post-hearing conference with Committee professionals and state court counsel re outcome of same and next-steps (.3);	4.10	\$3,690.00
1/8/2025	Timothy Burns	Participate in omnibus hearing for insurance purposes re the Committee's motion to lift stay and motion for derivative standing to prosecute the insurance claim (3.8);	3.80	\$4,256.00
1/16/2025	Jesse Bair	Participate in omnibus hearing re the debtor's amended disclosure statement, the Committee's lift stay motion, the OPF derivative standing motion, and the debtor's mediation motion (4.3);	4.30	\$3,870.00
1/16/2025	Jesse Bair	Participate in district court hearing re the Debtor's motion to abate the insurance action (1.0); participate in post-hearing conference with Committee professionals re outcome of same and next-steps (.3);	1.30	\$1,170.00
1/16/2025	Timothy Burns	Participate in omnibus hearing re the debtor's amended disclosure statement, the Committee's lift stay motion, the OPF derivative standing motion, and the debtor's mediation motion (4.3);	4.30	\$4,816.00
1/16/2025	Timothy Burns	Participate in district court hearing re the Debtor's motion to abate the insurance action (1.0); participate in post-hearing conference with Committee professionals re outcome of same and next-steps (.3);	1.30	\$1,456.00
1/21/2025	Jesse Bair	Participate in part 1 of continued hearing re the debtor's amended disclosure statement (1.0); participate in conference with Committee professionals re preliminary rulings and comments from the Court and strategy for part 2 of hearing (.4); participate in part 2 of continued hearing re the debtor's amended disclosure statement (.7);	2.10	\$1,890.00
1/21/2025	Timothy Burns	Participate in part 1 of continued hearing re the debtor's amended disclosure statement (1.0); participate in conference with Committee professionals re preliminary rulings and strategy for part 2 of hearing (.4); participate in part 2 of continued hearing re the debtor's amended disclosure statement (.7);	2.10	\$2,352.00

1/30/2025	Jesse Bair	Participate in continued hearing re the debtor's disclosure statement for insurance purposes (1.5);	1.50	\$1,350.00
1/30/2025	Timothy Burns	Participate in continued hearing re the debtor's disclosure statement for insurance purposes (1.5);	1.50	\$1,680.00
<b>Totals for Hearings</b>			<b>26.30</b>	<b>\$26,530.00</b>

#### **Insurance Recovery Activities**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Narrative</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
1/1/2025	Timothy Burns	Draft Omnibus Reply re Insurance Standing Motion (5.5);	5.50	\$6,160.00
1/1/2025	Brian Cawley	Research demand requirement for derivative standing and draft summary of same as it pertains to reply brief (1.8);	1.80	\$990.00
1/1/2025	Alexander Castro	Draft section on futility requirement for Omnibus Reply to the Debtor's and Insurer's Objection to the Committee's Insurance Derivative Standing Motion (3.1);	3.10	\$1,457.00
1/2/2025	Alexander Castro	Research conflict of interest exception to business judgment rule for derivative standing reply (2.0);	2.00	\$940.00
1/2/2025	Alexander Castro	Continue drafting particular sections of the Committee's insurance derivative standing reply brief (1.6);	1.60	\$752.00
1/2/2025	Timothy Burns	Participate in call with B. Weisenberg and J. Prol re January 8 hearing briefing (.8);	0.80	\$896.00
1/2/2025	Timothy Burns	Final review and revision of omnibus insurance derivative standing reply draft (.6);	0.60	\$672.00
1/2/2025	Timothy Burns	Final review and revision of Insurance Abeyance Motion Response (.5);	0.50	\$560.00
1/2/2025	Timothy Burns	Participate in additional call with B. Weisenberg re January 8 hearing briefing (.2);	0.20	\$224.00
1/2/2025	Brian Cawley	Draft section of omnibus reply on justiciability of coverage defenses and other coverage issues (4.9);	4.90	\$2,695.00
1/2/2025	Brian Cawley	Implement partner edits into abeyance opposition brief and finalize same (1.9);	1.90	\$1,045.00
1/2/2025	Alexander Castro	Edit, revise, and cite-check Insurance Derivative Standing Reply (1.1);	1.10	\$517.00
1/2/2025	Timothy Burns	Continue drafting omnibus reply to insurance standing motion (5.8);	5.80	\$6,496.00
1/2/2025	Timothy Burns	Begin preparing additional disclosure statement insurance Objection (.3); conference with A. Castro re assignment re same (.2);	0.50	\$560.00

1/3/2025	Alexander Castro	Begin drafting Second RCBO Disclosure Statement Objection Insurance Section (3.3);	3.30	\$1,551.00
1/3/2025	Alexander Castro	Continue drafting Second RCBO Disclosure Statement Objection Insurance Section (3.1);	3.10	\$1,457.00
1/3/2025	Alexander Castro	Identify key materials for inclusion in January 8 hearing preparation binder (1.2);	1.20	\$564.00
1/4/2025	Nathan Kuenzi	Review and analyze insurance aspects of Debtor's Amended Plan and Amended Disclosure Statement (1.8);	1.80	\$990.00
1/5/2025	Nathan Kuenzi	Analyze near-final version of draft reply in support of lifting the automatic stay (.8);	0.80	\$440.00
1/5/2025	Brian Cawley	Respond to T. Burns request regarding research on bad faith (.3);	0.30	\$165.00
1/5/2025	Timothy Burns	Review and revise motion for relief from stay reply (4.8);	4.80	\$5,376.00
1/6/2025	Nathan Kuenzi	Revise and edit current draft of the Committee's Disclosure Statement Insurance Objection (1.3);	1.30	\$715.00
1/6/2025	Jesse Bair	Review B. Wiesenbergs correspondence re potential insurance objections to the amended disclosure statement (.1); participate in call with B. Wiesenbergs re same (.2);	0.30	\$270.00
1/6/2025	Jesse Bair	Formulate potential additional insurance objections to the debtors amended disclosure statement (.4);	0.40	\$360.00
1/6/2025	Timothy Burns	Review and revise most recent version of the Committee's stay relief reply (.8);	0.40	\$448.00
1/6/2025	Timothy Burns	Participate in call with Committee professionals re preparations for upcoming state court counsel meeting re lift stay hearing (.4); participate in additional conference with J. Bair re disclosure statement insurance objections (.1);	0.50	\$560.00
1/6/2025	Alexander Castro	Revise and edit 2nd Objection to Debtors Disclosure Statement (1.4);	1.40	\$658.00
1/6/2025	Jesse Bair	Brief review re certain insurers' and the debtors objections to the motion to lift stay (.2); review and respond to correspondence with Committee professionals re potential response to same (.2);	0.40	\$360.00
1/6/2025	Timothy Burns	Review and revise most recent version of the Committee's insurance standing reply (.4);	0.40	\$448.00
1/6/2025	Alexander Castro	Prepare hearing preparations binder for January 8 omnibus hearing (.6);	0.60	\$282.00
1/6/2025	Nathan Kuenzi	Additional analysis of insurance sections of the Amended Disclosure Statement (1.3);	1.30	\$715.00

1/6/2025	Timothy Burns	Begin preparing for January 8 hearing (3.3);	3.30	\$3,696.00
1/6/2025	Timothy Burns	Review and revise insurance sections of draft Amended Disclosure Statement Objection (1.4);	1.40	\$1,568.00
1/6/2025	Nathan Kuenzi	Analyze and update insurance cases cited in the Committee's reply in support of its motion for insurance derivative standing (.6); revise and finalize brief (.9);	1.50	\$825.00
1/6/2025	Brian Cawley	Research and incorporate additional derivative standing case law into the Committee's omnibus reply (1.8);	1.80	\$990.00
1/6/2025	Jesse Bair	Participate in conference with T. Burns re debtor amended disclosure statement and response to same (.1);	0.10	\$90.00
1/6/2025	Nathan Kuenzi	Analyze and update insurance cases cited in the Committee's reply in support of relief from stay (.8);	0.80	\$440.00
1/6/2025	Jesse Bair	Review and edit the Committee's reply in support of the insurance derivative standing motion (.2);	0.20	\$180.00
1/6/2025	Jesse Bair	Participate in call with Committee professionals re preparations for upcoming state court counsel meeting re lift stay hearing (.4);	0.40	\$360.00
1/7/2025	Jesse Bair	Detailed review of the parties' lift stay briefing in preparation for upcoming oral argument re same (2.7);	2.70	\$2,430.00
1/7/2025	Nathan Kuenzi	Draft summary for J. Bair re factual issues in connection with trial-ready RCBO claim (.4);	0.40	\$220.00
1/7/2025	Nathan Kuenzi	Continue drafting insurance section of the Committee's Objection to the Debtor's Amended Disclosure Statement (5.3);	5.30	\$2,915.00
1/7/2025	Jesse Bair	Review the debtor's coverage chart and pertinent information re debtor policy characteristics in connection with upcoming oral argument on the Committee's lift stay motion (.4);	0.40	\$360.00
1/7/2025	Jesse Bair	Begin reviewing the debtor's amended disclosure statement for insurance purposes (.9);	0.90	\$810.00
1/7/2025	Jesse Bair	Research and analyze applicable insurance case law in preparation for oral argument on the Committee's motion to lift the stay (1.8);	1.80	\$1,620.00



1/7/2025	Jesse Bair	Review the parties' briefing on the Committee's insurance derivative standing motion in preparation for upcoming hearing re same (1.1); review the parties' briefing on the Debtor's motion to abate the insurance action in connection with same (.2);	1.30	\$1,170.00
1/7/2025	Timothy Burns	Continue preparing for January 8 omnibus hearing (6.1);	6.10	\$6,832.00
1/8/2025	Jesse Bair	Review and edit insurance section of the Committee's objection to the debtor's amended disclosure statement (.3);	0.30	\$270.00
1/8/2025	Jesse Bair	Review the debtor's motion to compel mediation (.2);	0.20	\$180.00
1/8/2025	Jesse Bair	Review correspondence with Committee professionals re objections and response to comparison chart in the debtor's disclosure statement (.1);	0.10	\$90.00
1/8/2025	Nathan Kuenzi	Analyze Purdue Pharma issues and releases for third party carriers in connection with objection to the Debtor's Amended Disclosure Statement (.9);	0.90	\$495.00
1/8/2025	Nathan Kuenzi	Review and respond to correspondence with B. Weisenberg re insurance section arguments in the Committee's Disclosure Statement Objection (.4);	0.40	\$220.00
1/8/2025	Nathan Kuenzi	Draft summary of issues addressed by Court for follow-up in continued matters/issues reserved for January 16 hearing (1.0);	1.00	\$550.00
1/8/2025	Jesse Bair	Continue preparing for hearing on the Committee's motion to lift the stay for insurance purposes, with particular focus on drafting oral argument outline (3.9);	3.90	\$3,510.00
1/8/2025	Timothy Burns	Final preparations for omnibus January 8 hearing (5.6);	5.60	\$6,272.00
1/8/2025	Timothy Burns	Participate in post-hearing conference with Committee professionals and state court counsel re outcome of hearing and next-steps (.3);	0.30	\$336.00
1/8/2025	Jesse Bair	Research re the Plan's non-consensual release of survivor direct claims against the insurers (.5); correspond with Committee professionals re same (.1);	0.60	\$540.00
1/9/2025	Jesse Bair	Draft revised version of the Committee's insurance-related disclosure statement objections (1.8); review and respond to correspondence with Committee professionals re same (.1);	1.90	\$1,710.00
1/9/2025	Timothy Burns	Conference with N. Kuenzi re January 8 hearing follow-up items (.2);	0.20	\$224.00

1/9/2025	Timothy Burns	Review and revise draft objection re mediation motion (.2);	0.20	\$224.00
1/9/2025	Timothy Burns	Review various correspondence with Committee professionals re Amended Disclosure Statement Objection issues (.4);	0.40	\$448.00
1/9/2025	Timothy Burns	Met with N. Kuenzi re preparation for Abeyance Motion hearing (.2);	0.20	\$224.00
1/9/2025	Timothy Burns	Review the debtor's motion to compel mediation (.2);	0.20	\$224.00
1/9/2025	Alexander Castro	Identify key materials for inclusion in insurance abeyance motion hearing preparation binder (.9);	0.90	\$423.00
1/9/2025	Timothy Burns	Review correspondence with Committee professionals re Abeyance Motion hearing (.2);	0.20	\$224.00
1/9/2025	Timothy Burns	Review correspondence with Committee professionals re direct claims release issues in Amended Plan (.2);	0.20	\$224.00
1/9/2025	Timothy Burns	Review correspondence with Lowenstein and state court counsel re January 8 hearing outcome (.1);	0.10	\$112.00
1/9/2025	Timothy Burns	Review additional correspondence with Committee professionals re Amended Disclosure Statement objections (.2);	0.20	\$224.00
1/9/2025	Nathan Kuenzi	Conference with T. Burns re January 8 hearing follow-up items (.2);	0.20	\$110.00
1/9/2025	Jesse Bair	Participate in call with B. Wiesenberg re insurance objections to the Amended Disclosure Statement (.1);	0.10	\$90.00
1/9/2025	Timothy Burns	Review correspondence with Committee professionals, state court counsel, and the Committee re the Debtor's mediation motion (.1);	0.10	\$112.00
1/9/2025	Timothy Burns	Review additional insurance insert for the Committee's disclosure statement objection (.2);	0.20	\$224.00
1/9/2025	Jesse Bair	Brief review of Amended Plan (.2); respond to Committee professionals questions re insurance issues under the Amended Plan (.2);	0.40	\$360.00
1/9/2025	Jesse Bair	Draft additional insurance insert for the Committee's amended disclosure statement objection (.4); review and respond to various correspondence with Committee professionals re same and potential additional insurance-related objections (.3);	0.70	\$630.00
1/10/2025	Jesse Bair	Draft further revised version of insurance section to the Committee's disclosure statement objection brief (.7);	0.70	\$630.00

1/10/2025	Jesse Bair	Participate in additional call with B. Wiesenber, J. Prol, and T. Burns re Committee insurance disclosure statement objections and finalization of opposition brief in connection with same (.6);	0.60	\$540.00
1/10/2025	Alexander Castro	Prepare hearing preparation binder for hearing re the Debtor's insurance abeyance motion (.7);	0.70	\$329.00
1/10/2025	Timothy Burns	Review and respond to correspondence with A. Castro re preparations for Insurance Abeyance Motion hearing (.2);	0.20	\$224.00
1/10/2025	Timothy Burns	Participate in call with B. Wiesenber, J. Prol, and J. Bair re Committee insurance disclosure statement objections and finalization of opposition brief in connection with same (.6);	0.60	\$672.00
1/10/2025	Jesse Bair	Additional review of the debtor's amended Plan in connection with revising the Committee's disclosure statement insurance objections (.2);	0.20	\$180.00
1/10/2025	Jesse Bair	Review and edit near-final version of the Committee's objection to the amended disclosure statement (1.2); correspond with Lowenstein re same (.1);	1.30	\$1,170.00
1/10/2025	Timothy Burns	Review and respond to various correspondence with Committee professionals re revisions and finalization of the Committee's Amended Disclosure Statement Objection (.4);	0.40	\$448.00
1/10/2025	Timothy Burns	Review Order shortening time (.1);	0.10	\$112.00
1/10/2025	Karen DempSKI	Docket/calendar hearing re the debtor's mediation motion (.1);	0.10	\$34.00
1/10/2025	Jesse Bair	Draft insurance insert to the Committee's solicitation letter (.6);	0.60	\$540.00
1/10/2025	Jesse Bair	Participate in call with B. Wiesenber re insurance disclosure statement objection arguments (.2);	0.20	\$180.00
1/11/2025	Timothy Burns	Brief review of insurers' and debtor's reply briefs in support of abeyance motion (.2);	0.20	\$224.00
1/13/2025	Jesse Bair	Participate in conference with T. Burns re insurance strategy and preparation for upcoming amended disclosure statement hearing (.2);	0.20	\$180.00
1/13/2025	Timothy Burns	Review final version of amended disclosure statement objection (.6);	0.60	\$672.00
1/14/2025	Timothy Burns	Review Debtor Reply re First Amended Disclosure Statement (.4);	0.40	\$448.00
1/14/2025	Timothy Burns	Begin preparing for Abeyance Motion Hearing (1.3);	1.30	\$1,456.00

1/14/2025	Jesse Bair	Begin drafting rough outline of insurance issues in preparation for hearing on the debtor's amended disclosure statement (1.1); review transcript of hearing re the debtor's original disclosure statement in preparation for upcoming hearing (.3);	1.40	\$1,260.00
1/14/2025	Nathan Kuenzi	Analyze caselaw cited in replies/oppositions to the Committee's recent filings (1.1);	1.10	\$605.00
1/14/2025	Nathan Kuenzi	Review transcript of January 8 hearing before Judge Lafferty in preparation for January 16 hearings and draft summary of key issues with quotations (1.3);	1.30	\$715.00
1/15/2025	Jesse Bair	Review and analyze California insurance case law in preparation for upcoming hearing on the amended disclosure statement, with particular focus on bad faith issues (1.5);	1.50	\$1,350.00
1/15/2025	Timothy Burns	Continue preparing for Disclosure Statement hearing and mediation motion hearing (3.8);	3.80	\$4,256.00
1/15/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re proposed oral ruling on the Committee's insurance derivative standing and lift stay motions (.1); review G. Albert email memo re outcome of oral ruling (.1);	0.20	\$180.00
1/15/2025	Jesse Bair	Prepare for amended disclosure statement by reviewing the amended Plan (.6); the amended disclosure statement (.2); and the survivors' trust documents (.3);	1.10	\$990.00
1/15/2025	Jesse Bair	Review the Debtor's reply in support of its amended disclosure statement (.9);	0.90	\$810.00
1/15/2025	Nathan Kuenzi	Analyze CNA and Certain Insurers' reply (.3); correspond with T. Burns re arguments raised in same (.3);	0.60	\$330.00
1/15/2025	Jesse Bair	Continue preparing for hearing on the debtor's amended disclosure statement, with particular focus on drafting outline re disclosure statement and plan insurance deficiencies (1.8);	1.80	\$1,620.00
1/15/2025	Jesse Bair	Review the debtor's reply in support of its mediation motion (.2);	0.20	\$180.00
1/15/2025	Jesse Bair	Review Chubb's response to the Debtor's mediation motion (.1);	0.10	\$90.00
1/15/2025	Timothy Burns	Continue preparing for Insurance Abeyance motion hearing (2.3);	2.30	\$2,576.00
1/16/2025	Jesse Bair	Additional review of California insurance bad faith case law in preparation for amended disclosure statement hearing (.2);	0.20	\$180.00

1/16/2025	Timothy Burns	Participate in post-hearing conference with Lowenstein and T. Burns re outcome of amended disclosure statement hearing and case next-steps in light of same (.4);	0.40	\$448.00
1/16/2025	Jesse Bair	Participate in amended disclosure statement hearing prep and strategy session with Committee professionals (1.6);	1.60	\$1,440.00
1/16/2025	Jesse Bair	Correspond with A. Castro re analysis needed re all outstanding discovery in the insurance district court action (.1);	0.10	\$90.00
1/16/2025	Nathan Kuenzi	Analyze the Debtor's Amended Plan and compare against DRVC, Syracuse, and Rochester insurance Plan treatments (1.6);	1.60	\$880.00
1/16/2025	Timothy Burns	Finish preparing for hearing re the Debtor's insurance abeyance motion (1.9);	1.90	\$2,128.00
1/16/2025	Jesse Bair	Continue preparing for amended disclosure statement hearing, with particular focus on finalizing outline re insurance deficiencies in connection with same (1.6);	1.60	\$1,440.00
1/16/2025	Nathan Kuenzi	Draft summaries of major points addressed by Judge Corley and Judge Lafferty in 1/16 hearings (.6);	0.60	\$330.00
1/16/2025	Timothy Burns	Participate in amended disclosure statement hearing prep and strategy session with Committee professionals (1.6);	1.60	\$1,792.00
1/16/2025	Jesse Bair	Participate in post-hearing conference with Lowenstein and T. Burns re outcome of amended disclosure statement hearing and case next-steps in light of same (.4);	0.40	\$360.00
1/17/2025	Timothy Burns	Review correspondence with Lowenstein and the Committee re the Debtor's mediation motion (.1); review correspondence with Lowenstein and the Committee re outcomes of recent hearings (.1);	0.20	\$224.00
1/17/2025	Alexander Castro	Review and analyze all insurance-related discovery requests, responses, and assesses all outstanding insurance discovery in the bankruptcy case (1.9);	1.90	\$893.00
1/17/2025	Nathan Kuenzi	Analyze Debtor's reply in support of its motion to compel mediation (.6);	0.60	\$330.00
1/17/2025	Timothy Burns	Review correspondence with Committee professionals and state court counsel re continued hearing re the debtor's disclosure statement (.2);	0.20	\$224.00

1/17/2025	Nathan Kuenzi	Review Order granting motion to hold insurance case in abeyance (.2); correspond with BB team re same and continuing discovery obligations (.2);	0.40	\$220.00
1/17/2025	Timothy Burns	Review internal BB correspondence re insurance discovery status (.1);	0.10	\$112.00
1/17/2025	Timothy Burns	Review A. Castro's memo re insurance discovery status (.2); analysis re potential follow-up re same (.1);	0.30	\$336.00
1/17/2025	Alexander Castro	Review and analyze all insurance discovery requests, responses, production, and related disclosures to assess any outstanding insurance discovery in the district court insurance action (3.2); draft memo summarizing same (.7);	3.90	\$1,833.00
1/18/2025	Jesse Bair	Review and respond to correspondence with B. Wiesenbergs re proposed order on the Committee's derivative insurance motion (.1);	0.10	\$90.00
1/19/2025	Timothy Burns	Review district court's order re Insurance Abeyance Motion (.1); prepare internal memo re insurance discovery issues (.2);	0.30	\$336.00
1/19/2025	Timothy Burns	Review correspondence with J. Bair and B. Weisenberg re draft order re derivative standing motion (.1); review draft order and correspond with B. Weisenberg re same (.1);	0.20	\$224.00
1/20/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re strategy for continued hearing re the debtor's amended disclosure statement (.1);	0.10	\$90.00
1/20/2025	Timothy Burns	Review correspondence with B. Weisenberg and the Debtor re Insurance Standing order (.1);	0.10	\$112.00
1/20/2025	Jesse Bair	Review revised draft order denying the Committee's insurance derivative standing motion without prejudice, including brief review of transcript re oral ruling (.1);	0.10	\$90.00
1/20/2025	Jesse Bair	Review the district court's order re motion to hold insurance case in abeyance and related correspondence with BB team re same (.1);	0.10	\$90.00
1/21/2025	Nathan Kuenzi	Analyze case law re public policy importance of bad faith rights in connection with ongoing insurance disclosure statement issues (.6);	0.60	\$330.00
1/21/2025	Timothy Burns	Conference with B. Weisenberg re hearing preparations (.1); provide instructions to N. Kuenzi re assignment re bad faith issues (.2);	0.30	\$336.00



1/21/2025	Jesse Bair	Participate in post-hearing meeting with BB team re outcome of continued hearing re the debtor's amended disclosure statement hearing and next-steps in connection with same (.3);	0.30	\$270.00
1/21/2025	Timothy Burns	Participate in call with B. Weisenberg re hearing and strategy (.2);	0.20	\$224.00
1/21/2025	Jesse Bair	Prepare for upcoming continued hearing re the debtor's amended disclosure statement (.2);	0.20	\$180.00
1/21/2025	Jesse Bair	Review correspondence with B. Wiesenberg and state court counsel re outcome of hearing re lift stay motion and amended disclosure statement and case next-steps (.1);	0.10	\$90.00
1/21/2025	Karen Dempski	Docket/calendar continued hearing re amended disclosure statement (.1);	0.10	\$34.00
1/21/2025	Timothy Burns	Participate in post-hearing meeting with BB team re outcome of continued hearing re the debtor's amended disclosure statement hearing and next-steps in connection with same (.3);	0.30	\$336.00
1/21/2025	Nathan Kuenzi	Participate in post-hearing meeting with BB team re outcome of continued hearing re the debtor's amended disclosure statement hearing and next-steps in connection with same (.3);	0.30	\$165.00
1/22/2025	Nathan Kuenzi	Analyze transcripts of proceedings before Judge Lafferty and Judge Corley for potential use in upcoming briefing (1.3);	1.30	\$715.00
1/23/2025	Timothy Burns	Review and respond to correspondence from N. Kuenzi re Boicourt letters (.1);	0.10	\$112.00
1/23/2025	Timothy Burns	Review correspondence with the court and parties re further continued disclosure statement hearing (.2);	0.20	\$224.00
1/23/2025	Jesse Bair	Review and respond to correspondence with the Court re adjourned further hearing on the debtor's amended disclosure statement (.1);	0.10	\$90.00
1/23/2025	Timothy Burns	Review correspondence with B. Wiesenberg and state court counsel re state court actions (.2);	0.20	\$224.00
1/23/2025	Timothy Burns	Review correspondence with B Weisenberg, the Committee, and state court counsel re 1/21 hearing (.1);	0.10	\$112.00
1/23/2025	Timothy Burns	Review memo from A. Castro re discovery status in insurance adversary proceeding (.2);	0.20	\$224.00
1/23/2025	Timothy Burns	Review stay relief order (.1);	0.10	\$112.00

1/23/2025	Jesse Bair	Analysis of insurance issues in connection with further amended disclosure statement (.1);	0.10	\$90.00
1/23/2025	Timothy Burns	Conference with B. Weisenberg re state court counsel meeting and lift stay motion (.2);	0.20	\$224.00
1/24/2025	Nathan Kuenzi	Review correspondence with B. Wiesenberg and state court counsel re case insurance issues (.2);	0.20	\$110.00
1/24/2025	Jesse Bair	Review correspondence with Committee professionals and state court counsel re mediation issues and case litigation next-steps (.1);	0.10	\$90.00
1/24/2025	Jesse Bair	Brief review of 1/16 hearing transcript in preparation for continued hearing re the Debtor's disclosure statement (.1);	0.10	\$90.00
1/24/2025	Jesse Bair	Review and respond to correspondence with B. Wiesenberg re status of the insurance coverage action (.1);	0.10	\$90.00
1/25/2025	Timothy Burns	Review and respond to N. Kuenzi correspondence re discharge and release edits to RCBO's amended Plan and Disclosure Statement (.2);	0.20	\$224.00
1/25/2025	Timothy Burns	Conference with B. Weisenberg re additional revisions to Amended Disclosure Statement (.2);	0.20	\$224.00
1/25/2025	Timothy Burns	Review and respond to correspondence with B. Weisenberg re amended disclosure statement revisions and objections (.1); correspond with N. Kuenzi re assignment re same (.1);	0.20	\$224.00
1/25/2025	Nathan Kuenzi	Analyze Debtor's Amended Plan language re release/discharge issues (.4); compare to language in Plans in comparable cases (.9); draft summary for T. Burns comparing release/discharge in RCBO Plan relative to Plans in comparable cases (.5);	1.80	\$990.00
1/26/2025	Timothy Burns	Review and respond to correspondence with state court counsel (.2) and internal BB correspondence (.2) re Boicourt and insurance demand letters;	0.40	\$448.00
1/26/2025	Jesse Bair	Review and respond to various correspondence with the mediators and Committee professionals re renewed mediation sessions (.2);	0.20	\$180.00
1/26/2025	Nathan Kuenzi	Draft revised Boicourt letter template for RCBO (.6);	0.60	\$330.00



1/26/2025	Timothy Burns	Participate in call with the mediator (.2); review and respond to numerous correspondence with the mediators Committee professionals, the Committee, and state court counsel re additional mediation session (.6);	0.80	\$896.00
1/26/2025	Nathan Kuenzi	Draft correspondence to state court counsel re Boicourt letter issues (.4);	0.40	\$220.00
1/26/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re disclosure statement meet and confer with the debtor (.1);	0.10	\$90.00
1/26/2025	Jesse Bair	Review correspondence with Committee professionals re further revisions to the debtor's disclosure statement (.1);	0.10	\$90.00
1/27/2025	Nathan Kuenzi	Review caselaw and draft response to B. Weisenberg on DS objection and Plan language impacting bad faith rights (.3);	0.30	\$165.00
1/27/2025	Jesse Bair	Participate in call with T. Burns re school cases and Boicourt letter issues (.2);	0.20	\$180.00
1/27/2025	Timothy Burns	Review and revise materials for state court counsel re Boicourt and insurance demand letters (.9);	0.90	\$1,008.00
1/27/2025	Nathan Kuenzi	Review correspondence from state court counsel re Boicourt letter process (.2);	0.20	\$110.00
1/27/2025	Timothy Burns	Participate in call with state court counsel re case insurance issues and CVA actions (.6);	0.60	\$672.00
1/27/2025	Jesse Bair	Review correspondence with Committee professionals and state court counsel re CVA cases against co-defendant schools (.1);	0.10	\$90.00
1/27/2025	Jesse Bair	Brief review of chart re disclosure statement issues for use with the debtor in connection with upcoming meet and confer (.1);	0.10	\$90.00
1/27/2025	Timothy Burns	Prepare for call with state court counsel re case insurance issues and CVA Actions (.6);	0.60	\$672.00
1/27/2025	Nathan Kuenzi	Draft revised, simplified RCBO coverage chart (1.0);	1.00	\$550.00
1/27/2025	Timothy Burns	Review and respond to correspondence with state court counsel re insurance demands (.4);	0.40	\$448.00
1/27/2025	Jesse Bair	Analyze remaining insurance issues with the debtor's disclosure statement (.1); review and respond to correspondence with Committee professionals re same (.2);	0.30	\$270.00

1/27/2025	Nathan Kuenzi	Draft further revised version of Boicourt letter template and related attachments, including incorporation of T. Burns edits (1.4);	1.40	\$770.00
1/28/2025	Timothy Burns	Correspond with N. Kuenzi re disclosure statement meet and confer with the Debtor (.1); review N. Kuenzi summary re outcome of same (.2);	0.30	\$336.00
1/28/2025	Jesse Bair	Review additional correspondence with the mediators, Committee, and state court counsel re 2/24-2/25 mediation session (.1);	0.10	\$90.00
1/28/2025	Nathan Kuenzi	Draft summary re outcome of disclosure statement meet and confer with the Debtor (.4);	0.40	\$220.00
1/28/2025	Jesse Bair	Review N. Kuenzi email memo re outcome of disclosure statement meet and confer with the debtor (.1); correspond with N. Kuenzi re next-steps and action items in light of same (.1);	0.20	\$180.00
1/28/2025	Nathan Kuenzi	Participate in disclosure statement meet and confer with the Debtor and Lowenstein (1.7);	1.70	\$935.00
1/29/2025	Jesse Bair	Review additional correspondence with state court counsel and Committee professionals re February mediation session (.1);	0.10	\$90.00
1/29/2025	Timothy Burns	Participate in call with B. Weisenberg re next disclosure statement hearing (.2);	0.20	\$224.00
1/29/2025	Jesse Bair	Review and respond to correspondence with Lowenstein and BB re disclosure statement insurance issues and potential edits to same (.2);	0.20	\$180.00
1/29/2025	Jesse Bair	Review the Court's Order re certain insurance disclosure statement issues (.3);	0.30	\$270.00
1/29/2025	Nathan Kuenzi	Review notes from disclosure statement meet and confer with the debtor (.3); draft correspondence to B. Weisenberg re follow-up deliverables (.2);	0.50	\$275.00
1/30/2025	Timothy Burns	Participate in post-hearing conference with Committee professionals re outcome of disclosure statement hearing and strategy re supplemental briefing on disclosure statement insurance issues (.5);	0.50	\$560.00
1/30/2025	Karen Dempshi	Docket/calendar continued motions hearing (.1);	0.10	\$34.00
1/30/2025	Nathan Kuenzi	Participate in post-hearing conference with Committee professionals re outcome of disclosure statement hearing and strategy re supplemental briefing on disclosure statement insurance issues (.5);	0.50	\$275.00

1/30/2025	Jesse Bair	Participate in call with T. Burns re preparations and strategy for upcoming hearing on the debtor's disclosure statement (.1); participate in additional call with T. Burns and B. Weisenberg re same (.5); review correspondence with Lowenstein team re same (.1); supplemental call with B. Wiesenberg re same (.1);	0.80	\$720.00
1/30/2025	Jesse Bair	Participate in portion of post-hearing conference with Committee professionals re outcome of disclosure statement hearing and strategy re supplemental briefing on disclosure statement insurance issues (.3);	0.30	\$270.00
1/30/2025	Timothy Burns	Prepare for continued hearing re the debtor's disclosure statement (2.9);	2.90	\$3,248.00
1/30/2025	Alexander Castro	Begin drafting memo summarizing research re particular aspects of insurance demands under California law (.5);	0.50	\$235.00
1/30/2025	Timothy Burns	Participate in call with J. Bair re preparations and strategy for upcoming hearing on the debtor's disclosure statement (.1); participate in additional call with J. Bair and B. Weisenberg re same (.5);	0.60	\$672.00
1/30/2025	Jesse Bair	Prepare for continued hearing re the debtor's disclosure statement, including further review of Judge Lafferty's Order on certain insurance issues and drafting of outline re outstanding disclosure statement insurance issues (.9);	0.90	\$810.00
1/31/2025	Timothy Burns	Participate in conference with BB team re strategy re supplemental insurance briefing on debtor disclosure statement issues (.2);	0.20	\$224.00
1/31/2025	Timothy Burns	Review correspondence with B. Weisenberg re Disclosure statement briefing and hearing schedule (.1);	0.10	\$112.00
1/31/2025	Nathan Kuenzi	Participate in call with B. Weisenberg re insurance strategy and brief in response to Court's memorandum (.2);	0.20	\$110.00
1/31/2025	Nathan Kuenzi	Participate in conference with BB team re strategy re supplemental insurance briefing on debtor disclosure statement issues (.2);	0.20	\$110.00
1/31/2025	Jesse Bair	Participate in conference with BB team re strategy re supplemental insurance briefing on debtor disclosure statement issues (.2);	0.20	\$180.00
1/31/2025	Timothy Burns	Participate in conference with J. Bair re outcome of Committee meeting and next-steps (.1);	0.10	\$112.00
1/31/2025	Brian Cawley	Revise and supplement research memo re particular aspects of insurance demands under California law (.3);	0.30	\$165.00

1/31/2025	Karen DempSKI	Docket/calendar dates for amended disclosure statement hearing (.1);	0.10	\$34.00
1/31/2025	Timothy Burns	Review and prepare internal memo re mediation prep materials from Lowenstein (.2);	0.20	\$224.00
1/31/2025	Jesse Bair	Participate in conference with T. Burns re outcome of Committee meeting and next-steps (.1);	0.10	\$90.00
1/31/2025	Timothy Burns	Review correspondence with BB team and Lowenstein re next round of disclosure statement objections and hearing re same (.2);	0.20	\$224.00
1/31/2025	Alexander Castro	Finish drafting memo summarizing research re particular requirements for insurance demands under California law (.6);	0.60	\$282.00
<b>Totals for Insurance Recovery Activities</b>			<b>174.20</b>	<b>\$144,276.00</b>

<b>Total Hours and Fees</b>			<b>205.50</b>	<b>\$175,402.00</b>
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#### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/07/2025	Cab, J. Bair (airport to hotel)	\$69.30
01/07/2025	Travel meal, T. Burns	\$7.80
01/07/2025	Hotel, T. Burns (2 nights)	\$862.88
01/07/2025	Hotel, J. Bair (2 nights)	\$862.88
01/07/2025	Delta Airlines, J. Bair (MSN-SFO, Jan. 7-9)	\$696.95
01/07/2025	Delta Airlines, T. Burns (MSN-SFO, Jan. 7-9)	\$696.95
01/08/2025	Travel meal, J. Bair	\$19.62
01/08/2025	Uber, J. Bair and T. Burns (court to hotel)	\$114.24
01/08/2025	Uber, J. Bair and T. Burns (hotel to court)	\$108.21
01/09/2025	Uber, J. Bair and T. Burns (hotel to airport)	\$115.85
01/09/2025	Airport parking, J. Bair	\$22.00
01/15/2025	Travel Meal, T. Burns	\$24.36
01/15/2025	United Airlines, T. Burns (MSN-SFO, Jan. 15)	\$270.10
01/15/2025	Delta Airlines, J. Bair (MSN-SFO, Jan. 15-17)	\$723.96
01/15/2025	Uber, T. Burns (airport to hotel)	\$249.26
01/15/2025	Hotel, T. Burns (2 nights)	\$853.26
01/15/2025	Hotel, J. Bair (2 nights)	\$853.26
01/16/2025	Lyft, T. Burns and J. Bair (court to hotel)	\$26.11
01/16/2025	Travel meal, J. Bair	\$26.36
01/16/2025	Uber, J. Bair and T. Burns (hotel to courthouse)	\$125.72
01/16/2025	Travel meal, T. Burns	\$35.63

01/17/2025	Delta Airlines, T. Burns (SFO-MSN, Jan. 17)	\$488.98
01/17/2025	Uber, J. Bair and T. Burns (hotel to airport)	\$179.15
01/17/2025	Airport parking, T. Burns	\$30.00
01/17/2025	Taxi, J. Bair (airport to hotel)	\$126.06
01/17/2025	Travel meal, T. Burns	\$13.34
01/17/2025	Airport parking, J. Bair	\$21.00
01/22/2025	Alphagraphics for T. Burns and J. Bair (spiral for prep documents)	\$21.10
<b>Total Expenses</b>		<b>\$7,644.33</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	25.90	\$470.00	\$12,173.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	11.00	\$550.00	\$6,050.00
Jesse Bair	Partner	54.60	\$900.00	\$49,140.00
Karen Dempski	Paralegal	0.40	\$340.00	\$136.00
Nathan Kuenzi	Associate	33.50	\$550.00	\$18,425.00
Timothy Burns	Partner	79.80	\$1,120.00	\$89,376.00

**Total Due This Invoice: \$183,046.33**