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*Counsel for the Official Committee of Unsecured Creditors*

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

Case No. 23-40523 WJL  
Chapter 11

*In re:*

THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation sole,

Debtor.

**COVER SHEET TO SECOND INTERIM  
FEE APPLICATION OF BURNS BAIR LLP  
AS SPECIAL INSURANCE COUNSEL TO  
THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR  
ALLOWANCE AND PAYMENT OF  
COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR THE PERIOD OF  
JANUARY 1, 2024 THROUGH APRIL 30,  
2024**

Judge: Hon. William J. Lafferty  
Date: July 24, 2024  
Time: 10:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
1300 Clay Street, Courtroom 220

Objecti



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Name of Applicant:	Burns Bair LLP
Name of Client:	The Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland
Time period covered by this application:	January 1, 2024 – April 30, 2024
Total compensation sought this period:	\$346,624.00
Total expenses sought this period:	\$16,940.53
Petition date:	May 8, 2023
Retention date:	July 14, 2023
Date of Order approving employment:	August 16, 2023
Total compensation approved by interim order to date:	\$428,446.20
Total expenses approved by interim order to date:	\$11,772.89
Total compensation paid by interim order to date:	\$428,446.20
Total expenses paid by interim order to date:	\$11,772.89
Blended rate in the Interim Application for all attorneys:	\$860.99
Blended rate in the Interim Application for all timekeepers:	\$838.67
Fees sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$191,484.00
Expenses sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$11,366.21
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals included in this application:	8
Number of professionals billing fewer than 15 hours to the case during this period:	3
Are any rates higher than those approved or disclosed at retention?	No
Interim or Final:	Interim

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**SUMMARY OF MONTHLY FEE STATEMENTS**

Date Filed & Docket	Period Covered	Total Compensation and Expenses Incurred		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date	
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees (80%)	Expenses (100%)
02/28/2024 [Dkt. 901]	1/1/2024 - 1/31/2024	\$72,023.00	\$8,204.79	\$57,618.40	\$8,204.79	\$57,618.40	\$8,204.79
03/29/2024 [Dkt. 1020]	2/1/2024 - 2/29/2024	\$49,516.00	\$0	\$39,612.80	\$0	\$39,612.80	\$0
4/30/2024 [Dkt. 1103]	3/1/2024 - 3/31/2024	\$117,816.00	\$3,161.42	\$94,252.80	\$3,161.42	\$94,252.80	\$3,161.42
5/30/2024 [Dkt. 1154]	4/1/2024 - 4/30/2024	\$107,269.00	\$5,574.32	\$85,815.20	\$5,574.32	\$0	\$0

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Fee Application Not Yet Paid: \$160,714.32

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*Counsel for the Official Committee of Unsecured Creditors*

15  
16 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
17 **OAKLAND DIVISION**

Case No. 23-40523 WJL

18 *In re:*

Chapter 11

19  
20 THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation  
21 sole,

22 Debtor.

**SECOND INTERIM FEE APPLICATION OF  
BURNS BAIR LLP AS SPECIAL INSURANCE  
COUNSEL TO THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS FOR  
ALLOWANCE AND PAYMENT OF FEES  
AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD FROM JANUARY 1, 2024  
THROUGH APRIL 30, 2024**

Judge: Hon. William J. Lafferty

Date: July 24, 2024

Time: 10:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court  
1300 Clay Street, Courtroom 220  
Oakland, CA 94612

Objection Deadline: July 5, 2024

1 Burns Bair LLP (the “**Applicant**” or “**Burns Bair**”), special insurance counsel to the  
2 Official Committee of Unsecured Creditors (the “**Committee**”) of the Roman Catholic Bishop  
3 of Oakland (the “**Debtor**”) in the above captioned chapter 11 case (the “**Chapter 11 Case**”)   
4 hereby submits its Second Interim Fee Application (the “**Interim Application**”), for an order,  
5 in substantially the form attached hereto as **Exhibit A**, pursuant to sections 330 and 331 of title  
6 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of  
7 Bankruptcy Procedure (the “**Bankruptcy Rules**”), the United States Trustee Appendix B  
8 Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed  
9 Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013  
10 (the “**U.S. Trustee Guidelines**”), the *Guidelines for Compensation and Expense Reimbursement*  
11 *of Professionals and Trustees* (the “**Northern District Guidelines**”), and the Local Bankruptcy  
12 Rules for the Northern District of California (the “**Local Rules**”), and the *Order Authorizing*  
13 *Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the  
14 “**Interim Compensation Order**”) [Dkt. No. 170] entered by the Court on June 23, 2023, for  
15 interim approval and allowance of (i) compensation for professional services rendered to the  
16 Committee from January 1, 2024 through and including April 30, 2024 (the “**Interim Fee**  
17 **Period**”) and (ii) reimbursement of expenses incurred in connection with such services; and, in  
18 support thereof, respectfully represents as follows:

19 **PRELIMINARY STATEMENT**

20 1. Since Burns Bair’s retention by the Committee on July 14, 2023, Burns Bair has  
21 been actively engaged in all aspects of the case with the goal of maximizing insurance recoveries  
22 to unsecured creditors of the Debtor. Upon its retention, Burns Bair reviewed and analyzed  
23 thousands of pages of the Debtor’s historical insurance policy materials, developed preliminary  
24 insurance exposure assessments for each of the Debtor’s insurance carriers, researched and  
25 briefed various insurance motions in both the main Case and the insurance adversary proceeding,  
26 presented to the Committee on case insurance issues, and began to develop the Committee’s  
27 overall insurance strategy, among other time-sensitive tasks.

28



1 Woodall as its chair. On May 30, 2023, the Committee selected Lowenstein Sandler LLP as its  
2 lead counsel. On June 1, 2023, the Committee selected Keller Benvenuti Kim LLP as local  
3 bankruptcy counsel. On July 14, 2023, the Committee selected Burns Bair LLP as special  
4 insurance counsel.

5 **C. The Committee’s Retention of Burns Bair**

6 7. On August 16, 2023, the Court entered the *Order Authorizing Retention of Burns*  
7 *Bair LLP as Special Insurance Counsel for the Official Committee of Unsecured Creditors of*  
8 *the Roman Catholic Bishop of Oakland, Effective as of July 14, 2023* [Dkt. No. 372]  
9 (the “**Retention Order**”). The Retention Order authorizes compensation and reimbursement to  
10 Burns Bair in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Northern District  
11 Guidelines, the Local Rules, and the Interim Compensation Order. Subject to Burns Bair’s  
12 application to the Court, the Debtor is authorized by the Retention Order to compensate Burns  
13 Bair at its standard hourly rates for services performed and to reimburse it for actual and  
14 necessary expenses incurred. The Retention Order authorizes Burns Bair to provide the  
15 following services to the Committee: (1) analyze, investigate, and assess the availability of  
16 coverage under the Debtor’s insurance policies; (2) represent the Committee in the adversary  
17 proceedings the Debtor filed against its insurers, Adv. Pro. No. 23-04028, *The Roman Catholic*  
18 *Bishop of Oakland v. Pacific Indemnity, et. al.* and Adv. Pro. No. 23-04037, *The Roman Catholic*  
19 *Bishop of Oakland vs. American Home Assurance Co.* (jointly, the “**Insurance Adversary**  
20 **Proceedings**”) (3) engage in potential mediation and/or other resolution of the claims, demands,  
21 and/or lawsuits related to the Debtor’s insurance policies; (4) advise, negotiate, and advocate on  
22 behalf of the Committee with respect to the Debtor’s insurance policies; and (5) provide related  
23 advice and assistance to the Committee as necessary [Dkt No. 372].

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1           **D. Summary of Professional Compensation and Reimbursement of Expenses Requested**

2           8. By this Interim Application, the Applicant seeks interim allowance of  
3 compensation in the amount of **\$346,624.00** and actual and necessary expenses in the amount of  
4 **\$16,940.53** for a total allowance of **\$363,564.53** for the Interim Fee Period.

5           9. All services for which Burns Bair requests compensation were performed for or  
6 on behalf of the Committee. Burns Bair has received no promises of payment from any source  
7 other than the Debtor for services rendered or to be rendered in any capacity whatsoever in  
8 connection with the matters covered by this Interim Application.

9           10. There is no agreement or understanding between Burns Bair and any other person  
10 other than the partners of Burns Bair for the sharing of compensation to be received for services  
11 rendered in this Chapter 11 Case. In connection with the Chapter 11 Case, as of this date Burns  
12 Bair has been paid \$191,484.00 in fees and \$11,366.21 in expenses.

13           11. Burns Bair has billed the Committee in accordance with its existing billing rates  
14 and procedures in effect during the Interim Fee Period. These rates are the same rates Burns  
15 Bair charges for services rendered by its attorneys and paraprofessionals in comparable matters  
16 and are reasonable given the compensation charged by comparably skilled practitioners in  
17 similar matters in both the California and national markets. The Summary Sheet filed herewith  
18 contains tables listing the Burns Bair attorneys and paraprofessional who have performed  
19 services for the Committee during the Interim Fee Period, including their job titles, hourly rates,  
20 aggregate number of hours worked in this matter, and, for attorneys, the year in which each  
21 professional was licensed to practice law. **Exhibit E** also contains a table summarizing the hours  
22 worked by the Firm's attorneys and paraprofessionals broken down by project billing code.  
23 Burns Bair maintains computerized time records, which have been filed on the docket with the  
24 Firm's monthly fee statements and furnished to the Committee, the Debtor, and the U.S. Trustee  
25 in the format specified by the Interim Compensation Order and are attached hereto as **Exhibit G**.  
26 The Committee has reviewed the Interim Application and approves the fees and expenses  
27 requested herein.

28



1 12. To the extent that time or disbursement charges for services rendered or  
2 disbursements incurred relate to the Interim Fee Period but were not processed prior to the  
3 preparation of this Application, Burns Bair reserves the right to request additional compensation  
4 for such services and reimbursement of such expenses in a future application.

5 **SUMMARY OF SERVICES PERFORMED**  
6 **BY BURNS BAIR DURING THE INTERIM FEE PERIOD**

7 13. During the Interim Fee Period, Burns Bair professionals expended 413.3 hours  
8 on behalf of the Committee. Of this, 260.8 hours were expended by Burns Bair partners, 134.8  
9 hours by Burns Bair associates, and 17.7 hours by paraprofessionals. In accordance with the  
10 Interim Compensation Order, the Northern District Guidelines, the U.S. Trustee Guidelines, and  
11 the Local Rules, Burns Bair has classified services performed into four specific categories set  
12 forth below. Burns Bair has attempted to place the services provided in the category that best  
13 relates to such services; because certain services may relate to one or more categories, however,  
14 services pertaining to one category may in fact be included in another category. The following  
15 summary of services rendered during the Interim Fee Period is not intended to be a detailed  
16 description of the work performed. Rather, it merely highlights certain project billing categories  
17 in which significant services were rendered by Burns Bair, as well as identifies some of the issues  
18 Burns Bair was required to address.

19 **A. Committee Meetings**  
20 **Fees: \$32,686.00; Total Hours: 32.7**

21 14. During the Interim Fee Period, Burns Bair attorneys attended Committee  
22 meetings and state court counsel meetings for the purpose of advising on case insurance issues.  
23 Meetings with the Committee and their state court counsel are a necessary aspect of Burns Bair's  
24 legal representation of the Committee.

25 **B. Fee Applications**  
26 **Fees: \$12,332.00; Total Hours: 17.0**

27 15. During the Interim Fee Period, Burns Bair prepared three Monthly Fee Statements  
28 for the periods January 1, 2024 through January 31, 2024 [Dkt. No. 901], February 1, 2024  
through February 29, 2024 [Dkt. No. 1020], March 1, 2024 through March 31, 2024

1 [Dkt. No. 1103], and April 1, 2024 through April 30, 2024 [Dkt. No. 1154]. Burns Bair also  
2 prepared its First Interim Fee Application [Dkt. 864] and participated in the fee hearing on same.

3 **C. Hearings**

4 **Fees: \$25,888.00; Total Hours: 26.1**

5 16. During the Interim Fee Period, Burns Bair attorneys appeared before the Court as  
6 special insurance counsel to the Committee at various hearings in both the Insurance Adversary  
7 Proceedings and the main Chapter 11 Case concerning case insurance issues, including, without  
8 limitation, various motions pertaining to the Committee's Rule 2004 subpoenas to the insurers,  
9 the debtor's mediation motion, and case management conferences in both the main case and the  
10 insurance action now pending in the District Court.

11 **D. Insurance Recovery Activities**

12 **Fees: \$275,718.00; Total Hours: 337.5**

13 17. In addition to the above described tasks, during the Interim Fee Period, Burns  
14 Bair expended a considerable number of hours on behalf of the Committee performing additional  
15 insurance recovery activities including, but not limited to, preparing for and participating in  
16 multiple full-day mediation sessions; briefing and arguing various motions associated with the  
17 Committee's Rule 2004 subpoenas to the insurers, including associated legal research and meet  
18 and confers regarding same; drafting the Committee's response to the insurers' motions to  
19 withdraw the reference; drafting the Committee's joinder in opposition to the insurers' motions  
20 to dismiss; drafting the Committee's portions of the insurance case management order; review  
21 and analysis of substantial insurance materials produced by the insurers under Rule 2004,  
22 including review and analysis of associated privilege logs; detailed research and assessment of  
23 California insurance law on numerous topics, including, among others, the duty to settle, bad  
24 faith, and insurance demand letters in connection with potential Committee insurance litigation  
25 and settlement strategies; developed revised insurance exposure assessments for each of the  
26 Debtor's insurance carriers; drafted revised presentation regarding the Debtor's coverage  
27 overview and exposure assessments for each carrier; and formulating overall insurance strategy  
28 on behalf of the Committee. These tasks are not meant to be a detailed description of all work  
performed.

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**ACTUAL AND NECESSARY DISBURSEMENTS**

18. During the Interim Fee Period, Burns Bair incurred a total of **\$16,940.53** in expenses. These expenses relate primarily to travel in connection with court hearings and in-person mediations, as well as payment for court fees. These expenses are reasonable and necessary for the administration of the Chapter 11 Case.

**LEGAL BASIS FOR INTERIM COMPENSATION**

19. The professional services for which Burns Bair requests interim allowance of compensation and reimbursement of expenses were rendered and incurred in connection with this case in the discharge of Burns Bair’s professional responsibilities as special insurance counsel for the Committee in this Chapter 11 Case. Burns Bair’s services have been necessary and beneficial to the Committee, the Debtor, its estate, creditors, and other parties of interest.

20. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, Burns Bair respectfully submits that the amount requested by Burns Bair is fair and reasonable given the complexity of the Chapter 11 Case, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, Burns Bair has reviewed the requirements of the Interim Compensation Order, the Northern District Guidelines, and the UST Guidelines and believes that the Interim Application complies with all of them.

**COMPLIANCE WITH LARGE CASE REQUIREMENTS**

21. Charts and tables based on such forms, and certain other exhibits, are attached and filled out with data to the extent relevant to this Chapter 11 Case:

- Exhibit B:** Customary and Comparable Compensation Disclosures with Fee Applications
- Exhibit C:** Budget and Staffing Plan;
- Exhibit D:** Summary of Timekeepers in this Application
- Exhibit E:** Summary of Compensation by Project Category;
- Exhibit F:** Summary of Expense Reimbursement; and
- Exhibit G:** Detailed records for the Compensation Period.

1           22. Pursuant to paragraph C.5 of the Large Case Guidelines, Burns Bair provides the  
 2 following statements:

<p>3 Did you agree to any variations from, or      4 alternatives to, your standard or customary      5 billing rates, fees or terms for services      6 pertaining to this engagement that were      provided during the application period? If so,      please explain.</p>	<p>No.</p>
<p>7 If the fees sought in this fee application as      8 compared to the fees budgeted for the time      period covered by this fee application are      9 higher by 10% or more, did you discuss the      reasons for the variation with the client?</p>	<p>N/A. The fees sought in this fee application      do not exceed the fees budgeted for the time      period covered.</p>
<p>10 Have any of the professionals included in this      11 fee application varied their hourly rate based      on the geographic location of the bankruptcy      case?</p>	<p>No.</p>
<p>12 Does the fee application include time or fees      13 related to reviewing or revising time records      or preparing, reviewing, or revising invoices?      14 (This is limited to work involved in preparing      and editing billing records that would not be      15 compensable outside of bankruptcy and does      not include reasonable fees for preparing a      16 fee application.). If so, please quantify by      hours and fees.</p>	<p>No. Any time worked on these tasks would      have been in connection with preparing      monthly fee statements.</p>
<p>17 Does this fee application include time or fees      18 for reviewing time records to redact any      privileged or other confidential information?      19 If so, please quantify by hours and fees.</p>	<p>In connection with preparing monthly fee      statements, Burns Bair spent approximately      3.6 hours reviewing invoices for privilege or      other confidential information.</p>
<p>20 If the fee application includes any rate      increases since retention:      21 i. Did your client review and approve those      rate increases in advance?      22 ii. Did your client agree when retaining the      law firm to accept all future rate increases? If      23 not, did you inform your client that they need      not agree to modified rates or terms in order      24 to have you continue the representation,      consistent with ABA Formal Ethics Opinion      25 11-458?</p>	<p>N/A</p>

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**AVAILABLE FUNDS**

23. The Applicant understands that the Debtor’s estate has sufficient funds available to pay the fees and costs sought herein.

**NOTICE**

Notice of the Interim Application has been provided to parties in interest in accordance with the procedures set forth in the Interim Compensation Order. Burns Bair submits that, in view of the facts and circumstances of the Chapter 11 Case, such notice is sufficient, and no other or further notice need be provided.

**CONCLUSION**

Burns Bair respectfully requests an interim allowance to Burns Bair as compensation for fees in the amount of **\$346,624.00** and actual and necessary expenses in the amount of **\$16,940.53** for a total allowance of **\$363,564.53**; and for such other and further relief as this Court deems proper.

Date: June 11, 2024

Respectfully submitted,

**BURNS BAIR LLP**

By: \_\_\_\_\_  
Jesse J. Bair

*Special Insurance Counsel for the  
Official Committee of Unsecured Creditors*

# EXHIBIT A

1 **LOWENSTEIN SANDLER LLP**  
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*Counsel for the Official Committee of Unsecured Creditors*

15 **UNITED STATES BANKRUPTCY COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **OAKLAND DIVISION**

18 *In re:*

19 THE ROMAN CATHOLIC BISHOP OF  
20 OAKLAND, a California corporation sole,

21 Debtor.  
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Case No. 23-40523 WJL

Chapter 11

**[PROPOSED] ORDER GRANTING  
SECOND INTERIM FEE APPLICATION  
OF BURNS BAIR LLP AS SPECIAL  
INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR  
ALLOWANCE AND PAYMENT OF  
COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD OF JANUARY 1, 2024  
THROUGH APRIL 30, 2024**

Judge: Hon. William J. Lafferty

Date: July 24, 2024

Time: 10:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court  
1300 Clay Street, Courtroom 220  
Oakland, CA 94612

Objection Deadline: July 5, 2024

1           Upon consideration of the *Second Interim Fee Application of Burns Bair LLP as Special*  
2 *Insurance Counsel to the Official Committee of Unsecured Creditors for Allowance and Payment*  
3 *of Compensation and Reimbursement of Expenses for the Period of January 1, 2024 through April*  
4 *30, 2024* (the “**Interim Application**”);<sup>1</sup> and this Court having jurisdiction to consider the Interim  
5 Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, the *Order*  
6 *Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal)  
7 and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the  
8 Northern District of California; and consideration of the Interim Application and the requested  
9 relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this  
10 Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Interim  
11 Application having been provided to the parties listed therein, and it appearing that no other or  
12 further notice need be provided; and this Court having reviewed the Interim Application and the  
13 declarations of Jesse Bair and Steven Woodall; and, upon the record and all of the proceedings  
14 had before the Court; and this Court having found and determined that the relief sought in the  
15 Interim Application is in the best interests of the Debtor, its estate, creditors, and all parties in  
16 interest; and that the legal and factual bases set forth in the Interim Application establish just  
17 cause for the relief granted herein; and after due deliberation and sufficient cause appearing  
18 therefor,

19           **IT IS HEREBY ORDERED THAT:**

- 20           1.       The Interim Application is granted as provided herein.
- 21           2.       Burns Bair is awarded an interim allowance of its compensation for professional  
22 services rendered in the amount of \$363,564.53 consisting of \$346,624.00 of fees and  
23 reimbursement of \$16,940.53 of actual and necessary expenses incurred during the Interim Fee  
24 Period.
- 25           3.       The Debtor is directed to pay Burns Bair the amount allowed in paragraph 2 above.

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Interim Application.



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4. The Court shall retain jurisdiction to determine any controversy arising in connection with this Order.

\*\* END OF ORDER \*\*

**Court Service List**

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*All registered ECF participants.*

# EXHIBIT B

**EXHIBIT B**  
**CUSTOMARY AND COMPARABLE DISCLOSURES WITH FEE APPLICATIONS**

**Privacy Act Statement.** 28 U.S.C. § 586(a)(3)(A) authorizes the collection of this information. The United States Trustee will use the information contained in this form to evaluate whether compensation and reimbursement of expenses filed by attorneys in larger chapter 11 cases - those cases with \$50 million or more in assets and \$50 million or more in liabilities - are appropriate and reasonable pursuant to 11 U.S.C. § 330. Disclosure of this information may be to a bankruptcy trustee or examiner when the information is needed to perform the trustee's or examiner's duties, or to the appropriate federal, state, local, regulatory, tribal, or foreign law enforcement agency when the information indicates a violation or potential violation of law. Other disclosures may be made for routine purposes. For a discussion of the types of routine disclosures that may be made, you may consult the Executive Office for United States Trustee's systems of records notice, UST-001, "Bankruptcy Case Files and Associated Records." See 71 Fed. Reg. 59,818 et seq. (Oct. 11, 2006). A copy of the notice may be obtained at the following link: <https://www.gpo.gov/fdsys/pkg/FR-2006-10-11/pdf/E6-16814.pdf>.

Failure to provide this information could result in an objection to your fee application, or other action by the United States Trustee. 11 U.S.C. § 330.

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

Category of Timekeeper	Blended Hourly Rate	
	BILLED <sup>1</sup> Firm for proceeding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner	\$1,010.28	\$1,021.73
Associate	\$511.02	\$550.00
Paralegal	\$361.32	\$340.00
All Timekeepers Aggregated	\$631.00	\$838.67

Case Name: Roman Catholic Bishop of Oakland  
Case Number: 23-BK-40523  
Applicant's Name: Burns Bair LLP  
Date of Application: June 11, 2024  
Interim or Final: Interim

<sup>1</sup> In addition to traditional hourly matters, Burns Bair also worked on contingent cases where hours are tracked each month, but not billed to the client.

# EXHIBIT C

## EXHIBIT C

### PROPOSED SECOND INTERIM BUDGET AND STAFFING PLAN FOR SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE ROMAN CATHOLIC BISHOP OF OAKLAND FOR THE PERIOD JANUARY 1, 2024 THROUGH APRIL 30, 2024

Project Category	Estimated Hours		Estimated Fees <sup>1</sup>	
	Low	High	Low	High
Adversary Proceedings and Bankruptcy Court Litigation	100	150	\$66,800.00	\$100,200.00
Court Hearings	25	35	\$16,700.00	\$23,380.00
Fee/Employment Applications	15	20	\$10,020.00	\$13,360.00
Mediation	50	75	\$33,400.00	\$50,100.00
Meetings of and Communication with Creditors	30	50	\$20,040.00	\$33,400.00
Plan and Disclosure Statement	15	25	\$10,020.00	\$16,700.00
Other - Insurance Matters	200	250	\$133,600.00	\$167,000.00
<b>TOTAL</b>	<b>435</b>	<b>605</b>	<b>\$290,580.00</b>	<b>\$404,140.00</b>

Burns Bair reserves its right to modify this budget and staffing plan in the event circumstances unforeseen at the time these were prepared would cause Burns Bair to be required to utilize additional or different staffing to appropriately deal with events that may arise in the bankruptcy case.

### STAFFING PLAN FOR COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE ROMAN CATHOLIC BISHOP OF OAKLAND FOR THE PERIOD JANUARY 1, 2024 THROUGH APRIL 30, 2024

Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter During the Budget Period	Average Hourly Rate
Partner	2	\$900 - \$1120
Associate	3-4	\$550
Paralegal	3	\$340

Burns Bair reserves its right to modify this budget and staffing plan in the event circumstances unforeseen at the time these were prepared that would cause Burns Bair to be required to utilize additional or different staffing to appropriately deal with events that may arise in the bankruptcy cases.

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<sup>1</sup> Burns Bair's estimated fees are calculated at the rate of \$668 per hour.

# EXHIBIT D

## EXHIBIT D

### SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

<b>NAME OF PROFESSIONAL:</b>	<b>POSITION</b>	<b>YEAR ADMITTED</b>	<b>HOURLY RATE</b>	<b>TOTAL HOURS</b>	<b>TOAL FEES</b>
Timothy W. Burns	Partner	1991	\$1,120.00	144.3	\$161,616.00
Jesse J. Bair	Partner	2013	\$900.00	116.5	\$104,850.00
Nathan M. Kuenzi	Associate	2020	\$550.00	71.4	\$39,270.00
Brian P. Cawley	Associate	2020	\$550.00	26.4	\$14,520.00
Karin Jonch-Clausen	Associate	2020	\$550.00	37.0	\$20,350.00
Brenda Horn-Edwards	Paralegal	N/A	\$340.00	5.3	\$1,802.00
Karen Dempski	Paralegal	N/A	\$340.00	1.6	\$544.00
Alyssa Turgeon	Paralegal	N/A	\$340.00	10.8	\$3,672.00
<b>Total:</b>				<b>413.3</b>	<b>\$346,624.00</b>



# EXHIBIT E

**EXHIBIT E**

**SUMMARY OF COMPENSATION REQUESTED BY CATEGORY**

<b>Category</b>	<b>Hours Billed this Fee Period</b>	<b>Total for Fee Statement</b>
Committee Meetings	32.7	\$32,686.00
Fee Applications	17.0	\$12,332.00
Hearings	26.1	\$25,888.00
Insurance Recovery Activities	337.5	\$275,718.00
<b>Total:</b>	<b>413.3</b>	<b>\$346,624.00</b>

# EXHIBIT F

**EXHIBIT F**

**SUMMARY OF EXPENSE REIMBURSEMENT**

<b>Expense Category</b>	<b>Total Expenses</b>
Court Fees, Pro Hac Vice filing fees	\$1,318.10
PACER	\$227.20
Database hosting	\$275.00
Travel (flights, taxi, hotels, meals, parking)	\$15,120.23
<b>TOTAL:</b>	<b>\$16,940.53</b>

**EXHIBIT G**  
**BURNS BAIR LLP INVOICES**

# 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 :** 2/27/2024

**Bill # :** 01373

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
1/4/2024	Timothy Burns	Prepare for state court counsel meeting (.1); participate in state court counsel meeting for insurance purposes re recent case developments (.2);	0.30	\$336.00
1/4/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re recent case developments (.2);	0.20	\$180.00
1/5/2024	Timothy Burns	Participate in Committee meeting for insurance purposes (.4);	0.40	\$448.00
1/7/2024	Timothy Burns	Review and consider agenda for upcoming, in-person state court counsel meeting (.2);	0.20	\$224.00
1/7/2024	Jesse Bair	Review correspondence with B. Wiesenbergs and state court counsel re agenda for upcoming state court counsel in-person meeting (.1);	0.10	\$90.00
1/10/2024	Jesse Bair	Participate in full-day, in-person state court counsel meeting re claim valuation, Debtor assets, and insurer coverage overview and exposure (6.0);	6.00	\$5,400.00
1/10/2024	Timothy Burns	Participate in full-day, in-person state court counsel meeting re claim valuation, Debtor assets, and insurer coverage overview and exposure (6.0);	6.00	\$6,720.00
1/12/2024	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re case developments and strategy (.3);	0.30	\$270.00
1/12/2024	Timothy Burns	Participate in call with J. Bair re outcome of Committee meeting and case next-steps (.1);	0.10	\$112.00

1/12/2024	Timothy Burns	Participate in Committee meeting for insurance purposes re case developments and strategy (.7);	0.70	\$784.00
1/12/2024	Jesse Bair	Participate in call with T. Burns re outcome of Committee meeting and case next-steps (.1);	0.10	\$90.00
1/18/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case status, strategy, and next-steps (.8);	0.80	\$896.00
1/18/2024	Jesse Bair	Participate in portion of state court counsel meeting for insurance purposes re case status, strategy, and next-steps (.6);	0.60	\$540.00
1/19/2024	Timothy Burns	Review Lowenstein correspondence re Committee weekly meeting agenda and in-person meeting agenda (.1);	0.10	\$112.00
1/19/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re case status, strategy, and next-steps (.6);	0.60	\$540.00
1/29/2024	Jesse Bair	Prepare for Committee meeting (.2);	0.20	\$180.00
1/29/2024	Jesse Bair	Participate in full-day Committee meeting for insurance purposes, including presentation of Committee insurance presentation (5.9);	5.90	\$5,310.00
<b>Totals for Committee Meetings</b>			<b>22.60</b>	<b>\$22,232.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
1/14/2024	Jesse Bair	Correspondence with G. Albert re next round of interim fee applications (.1);	0.10	\$90.00
1/18/2024	Jesse Bair	Review and edit Burns Bair invoice for inclusion with monthly fee submission (.8);	0.80	\$720.00
1/19/2024	Jesse Bair	Review and edit Burns Bair monthly fee submission (.1); correspondence with G. Albert re same (.1);	0.20	\$180.00
1/19/2024	Brenda Horn-Edwards	Draft Burns Bair's monthly fee statement (.2); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.40	\$136.00
1/22/2024	Jesse Bair	Provide instructions to B. Horn re drafting supplements to BB's first interim fee application (.2);	0.20	\$180.00
1/26/2024	Brenda Horn-Edwards	Draft Burns Bair's first interim fee application (2.1); prepare and edit exhibits to same (1.3); correspond with J. Bair re same (.1);	3.50	\$1,190.00
<b>Totals for Fee Applications</b>			<b>5.20</b>	<b>\$2,496.00</b>

## Hearings

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
1/9/2024	Timothy Burns	Participate in pre-hearing meeting with the insurers, Debtor, and Lowenstein (.4);	0.40	\$448.00
1/9/2024	Jesse Bair	Participate in post-hearing meeting with insurer counsel re case insurance issues (.3);	0.30	\$270.00
1/9/2024	Timothy Burns	Participate in conference with J. Bair re omnibus hearing strategy (.4);	0.40	\$448.00
1/9/2024	Timothy Burns	Participate in post-hearing meeting with insurer counsel (.3);	0.30	\$336.00
1/9/2024	Jesse Bair	Participate in pre-hearing meeting with the debtor, insurer counsel, and Lowenstein (.4);	0.40	\$360.00
1/9/2024	Timothy Burns	Participate in omnibus hearing for insurance purposes, including participating in meet and confer session during hearing break (4.5);	4.50	\$5,040.00
1/9/2024	Jesse Bair	Participate in hearing on mediation, case status, and Rule 2004 issues for insurance purposes, including participating in meet and confer session during hearing break (4.5);	4.50	\$4,050.00
1/17/2024	Jesse Bair	Participate in supplemental hearing re the Committee and Debtor's mediation motion and the insurers' objection to same (.9);	0.90	\$810.00
1/17/2024	Jesse Bair	Participate in post-hearing conference with T. Burns re outcome of mediation motion hearing and next-steps (.3);	0.30	\$270.00
1/17/2024	Timothy Burns	Participate in supplemental hearing re the Committee and Debtor's mediation motion and the insurers' objection to same (.9);	0.90	\$1,008.00
1/17/2024	Timothy Burns	Participate in post-hearing discussion with J. Bair re supplemental mediation motion hearing outcome and next-steps (.3);	0.30	\$336.00
<b>Totals for Hearings</b>			<b>13.20</b>	<b>\$13,376.00</b>

## Insurance Recovery Activities

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
1/2/2024	Jesse Bair	Correspondence with the debtor re insurance archeologist issues (.1);	0.10	\$90.00
1/2/2024	Jesse Bair	Review Stout analysis re insurance allocation and claim count per carrier (.2);	0.20	\$180.00
1/2/2024	Jesse Bair	Review correspondence with B. Wiesenbergs and BRG re parish insurance coverage (.1);	0.10	\$90.00
1/2/2024	Jesse Bair	Conference with N. Kuenzi re research needed re insurability of punitive damages (.1);	0.10	\$90.00



1/2/2024	Jesse Bair	Provide instructions to N. Kuenzi re updates needed to BB draft insurance overview presentation to state court counsel (.3); follow-up correspondence with N. Kuenzi re same (.1);	0.40	\$360.00
1/2/2024	Jesse Bair	Correspondence with B. Wiesenberg and Stout re call to discuss presentations for upcoming state court counsel meeting (.1);	0.10	\$90.00
1/2/2024	Nathan Kuenzi	Analyze revised expert claims valuation spreadsheets and update Oakland insurance coverage overview presentation for state court counsel (2.5);	2.50	\$1,375.00
1/2/2024	Jesse Bair	Review draft Stout presentation re claim valuation analysis (.3);	0.30	\$270.00
1/2/2024	Nathan Kuenzi	Participate in conference with J. Bair re issues relating to Oakland policies and coverage for punitive damages (.1);	0.10	\$55.00
1/2/2024	Nathan Kuenzi	Participate in conference with J. Bair re updates needed to BB draft insurance overview presentation to state court counsel (.3);	0.30	\$165.00
1/3/2024	Timothy Burns	Review correspondence from state court counsel re insurance recovery strategy issues (.1);	0.10	\$112.00
1/3/2024	Jesse Bair	Participate in conference with Lowenstein and Stout re claim valuation and insurance allocation presentations for upcoming state court counsel meeting (1.8);	1.80	\$1,620.00
1/3/2024	Timothy Burns	Review the US Trustee's limited objection to the parties' mediation motion (.1);	0.10	\$112.00
1/3/2024	Jesse Bair	Correspondence with the Debtor re CIGA claims submitted in the Bedivere liquidation (.1);	0.10	\$90.00
1/3/2024	Nathan Kuenzi	Additional analysis of revised expert claims valuation spreadsheets in connection with updating Oakland insurance coverage overview presentation for state court counsel (.2);	0.20	\$110.00
1/3/2024	Jesse Bair	Correspondence with Stout re TNCRRG exposure (.1);	0.10	\$90.00
1/4/2024	Nathan Kuenzi	Research issues regarding insurability of punitive damages under California law (1.3);	1.30	\$715.00
1/4/2024	Jesse Bair	Review information re parish insurance tenders (.1);	0.10	\$90.00
1/4/2024	Timothy Burns	Review recent California case law re expected or intended defense (.6);	0.60	\$672.00
1/4/2024	Jesse Bair	Participate in call with T. Burns re case developments, strategy, and ongoing insurance projects (.1);	0.10	\$90.00

1/4/2024	Nathan Kuenzi	Analysis and draft email memo to J. Bair re parish coverage issues and corresponding tender letters (.8);	0.80	\$440.00
1/4/2024	Nathan Kuenzi	Participate in conference with T. Burns re preparations for upcoming omnibus hearing and in-person state court counsel meeting (.3);	0.30	\$165.00
1/4/2024	Timothy Burns	Participate in call with J. Bair re case status and insurance action items (.1);	0.10	\$112.00
1/4/2024	Timothy Burns	Conference with N. Kuenzi re preparations for upcoming omnibus hearing and in-person state court counsel meeting (.3);	0.30	\$336.00
1/4/2024	Nathan Kuenzi	Analyze case materials relevant to the mediation motion, late-filed claim motion, Rule 2004 motion, and insurance allocation assessment, and identify key documents for hearing and state court counsel meeting preparation (2.0);	2.00	\$1,100.00
1/5/2024	Nathan Kuenzi	Continue analyzing case materials relevant to the mediation motion, late-filed claim motion, Rule 2004 motion, and insurance allocation assessment, and identify key documents omnibus hearing and state court counsel meeting preparation (1.2);	1.20	\$660.00
1/5/2024	Alyssa Turgeon	Create binder for omnibus hearing and state court counsel meeting preparations (1.4);	1.40	\$476.00
1/5/2024	Nathan Kuenzi	Research issues relating to lost policies in California and draft short email memorandum for J. Bair re same (.3);	0.30	\$165.00
1/5/2024	Jesse Bair	Review LMI's withdrawal of objection to late-filed claim motion (.1); correspondence with Lowenstein re same and arguments raised by LMI (.1); brief review of LMI coverage letters re Debtor tender of claim issues (.1); review the debtor's second amended coverage complaint and exhibit A re same in connection with LMI issues (.1);	0.40	\$360.00
1/5/2024	Timothy Burns	Correspondence with Lowenstein re analysis re Committee reply to the insurers' mediation motion objection (.2);	0.20	\$224.00
1/5/2024	Nathan Kuenzi	Additional analysis re insurability of punitive damages under California law (.3);	0.30	\$165.00
1/5/2024	Timothy Burns	Review Pacific's response brief re mediation motion (.2); review the insurers' withdrawals of late claim objections (.2);	0.40	\$448.00
1/5/2024	Jesse Bair	Participate in call with the debtor re various case insurance issues, including LMI's omission from the second amended coverage complaint, LMI tender issues, TNCRRG coverage, and CIGA issues (.3);	0.30	\$270.00

1/5/2024	Jesse Bair	Correspondence with the Debtor re LMI's withdrawal of late-filed proof of claim objection, tender issues, and LMI's omission from the debtor's second amended coverage complaint (.2);	0.20	\$180.00
1/5/2024	Jesse Bair	Review Pacific's withdrawal of objection to late-filed claim motion (.1);	0.10	\$90.00
1/5/2024	Jesse Bair	Revise and edit insurance coverage allocation and overview presentation for state court counsel (1.0);	1.00	\$900.00
1/5/2024	Timothy Burns	Additional analysis re LMI's withdrawal of late claim objection (.1); review correspondence with the debtor and J. Bair re same and LMI's omission from the second amended complaint (.1);	0.20	\$224.00
1/8/2024	Timothy Burns	Prepare for January 10 in-person state court counsel meeting, including thorough review of draft insurance allocation and claim valuation presentations (.8);	0.80	\$896.00
1/8/2024	Timothy Burns	Review Gallagher mediation motion declaration (.1);	0.10	\$112.00
1/8/2024	Jesse Bair	Participate in conference with T. Burns re insurance strategy for January 9 omnibus hearing (.2);	0.20	\$180.00
1/8/2024	Jesse Bair	Review Pacific's objection to the Committee and Debtor's joint mediation motion (.3); review certain insurers' joinders re same (.1);	0.40	\$360.00
1/8/2024	Jesse Bair	Review the US Trustee's limited objection to the Debtor and Committee's mediation motion (.1);	0.10	\$90.00
1/8/2024	Jesse Bair	Review the Debtor's status conference statement (.2);	0.20	\$180.00
1/8/2024	Jesse Bair	Review LMI's Rule 2004 reconsideration motion in preparation for January 9 hearing re same (.2);	0.20	\$180.00
1/8/2024	Jesse Bair	Begin initial preparations for January 29-30 in-person Committee meeting (.1);	0.10	\$90.00
1/8/2024	Timothy Burns	Prepare for January 9 omnibus hearing, including review of briefing on mediation motion, Rule 2004 motion, and late-filed claims motion (5.2);	5.20	\$5,824.00
1/8/2024	Jesse Bair	Review T. Burns correspondence re reply arguments to the insurers' objections to the Debtor and Committee's mediation motion (.1);	0.10	\$90.00
1/8/2024	Jesse Bair	Review joint reply to Pacific's mediation motion objection (.3);	0.30	\$270.00
1/8/2024	Timothy Burns	Participate in conference with C. Restel and J. Bair re January 9 hearing prep re LMI's Rule 2004 motion to reconsider (.3);	0.30	\$336.00

1/8/2024	Jesse Bair	Respond to B. Wiesenbeg correspondence re number of claims in certain insurer coverage period (.1);	0.10	\$90.00
1/8/2024	Timothy Burns	Participate in conference with J. Bair re insurance strategy for January 9 omnibus hearing (.2);	0.20	\$224.00
1/8/2024	Jesse Bair	Participate in conference with C. Restel and T. Burns re January 9 hearing prep re LMI's Rule 2004 motion to reconsider (.3);	0.30	\$270.00
1/9/2024	Jesse Bair	Review prior Rule 2004 briefing in preparation for hearing re same (.3);	0.30	\$270.00
1/9/2024	Jesse Bair	Participate in conference with J. Bair re omnibus hearing strategy (.4);	0.40	\$360.00
1/9/2024	Jesse Bair	Review CNA's suggested edits to the proposed order granting the Committee's Rule 2004 motion (.1); correspond with C. Restel re amending the Committee's proposed order in light of same and outcome of January 9 hearing (.1); review revised version of Rule 2004 order (.1);	0.30	\$270.00
1/9/2024	Timothy Burns	Finish preparing for 1/9 omnibus hearing (.8);	0.80	\$896.00
1/10/2024	Timothy Burns	Prepare for in-person state court counsel meeting (.8);	0.80	\$896.00
1/10/2024	Jesse Bair	Review insurer exposure analyses in preparation for in-person state court counsel meeting (.1); review insurance coverage overview presentation in preparation for in-person state court counsel meeting (.3);	0.40	\$360.00
1/10/2024	Jesse Bair	Review C. Restel correspondence with CNA re revised Order granting the Committee's Rule 2004 motion (.1);	0.10	\$90.00
1/10/2024	Jesse Bair	Review California case law re the expected or intended defense in preparation for in-person state court counsel meeting (.1); review California case law re coverage for negligent supervision claims involving sexual abuse in preparation for in-person state court counsel meeting (.1);	0.20	\$180.00
1/13/2024	Jesse Bair	Review CNA correspondence re acceptance of revised order granting the Committee's Rule 2004 motion (.1);	0.10	\$90.00
1/14/2024	Jesse Bair	Review and edit the Committee's reply to LMI's Rule 2004 motion to reconsider (1.0);	1.00	\$900.00
1/14/2024	Jesse Bair	Analyze 9th circuit case law re motion to reconsider standards (.2);	0.20	\$180.00
1/14/2024	Timothy Burns	Review and revise the Committee's response to LMI's Rule 2004 motion to reconsider/clarify (.3);	0.30	\$336.00

1/14/2024	Jesse Bair	Correspondence with Lowenstein re suggested edits to the Committee's reply to LMI's Rule 2004 motion to reconsider (.1);	0.10	\$90.00
1/16/2024	Jesse Bair	Review Pacific's request for judicial notice in further support of its objection to the Committee and Debtor's mediation motion (.1);	0.10	\$90.00
1/16/2024	Jesse Bair	Review A. Haberkon certification in support of the insurers' proof of claim expert motion (.1);	0.10	\$90.00
1/16/2024	Jesse Bair	Review the Committee and Debtor's notice of proposed revised mediation motion (.2);	0.20	\$180.00
1/16/2024	Jesse Bair	Review Pacific's status report and supplemental brief in support of its mediation motion objection (.2);	0.20	\$180.00
1/17/2024	Jesse Bair	Review Pacific's objection to the revised proposed mediation order (.1);	0.10	\$90.00
1/17/2024	Jesse Bair	Review B. Wiesenbergs correspondence re recent case developments (.1);	0.10	\$90.00
1/17/2024	Jesse Bair	Review correspondence with the debtor and the insurers re issues re the revised protective order (.1);	0.10	\$90.00
1/18/2024	Jesse Bair	Review final version of the Committee's opposition to LMI's Rule 2004 motion to reconsider (.1);	0.10	\$90.00
1/18/2024	Jesse Bair	Review C. Restel certification re entry of order re the insurers' expert POC motion (.1);	0.10	\$90.00
1/18/2024	Timothy Burns	Prepare for call with particular state court counsel re mediation hearing outcome (.3);	0.30	\$336.00
1/18/2024	Jesse Bair	Participate in call with particular state court counsel and T. Burns re case insurance strategy (.2);	0.20	\$180.00
1/18/2024	Jesse Bair	Review order granting the Committee's Rule 2004 insurance subpoena and email Lowenstein team re same (.1);	0.10	\$90.00
1/18/2024	Timothy Burns	Participate in call with particular state court counsel and J. Bair re mediation hearing outcome (.2); additional analysis re insurance next-steps in connection with same (.3);	0.50	\$560.00
1/19/2024	Timothy Burns	Review correspondence with Lowenstein and the insurers re Rule 2004 subpoenas (.1);	0.10	\$112.00
1/19/2024	Timothy Burns	Review final version of the Committee's objection to LMI's Rule 2004 motion to reconsider (.2);	0.20	\$224.00
1/19/2024	Jesse Bair	Review correspondence with C. Restel and the insurers re Rule 2004 insurance discovery (.1);	0.10	\$90.00

1/22/2024	Jesse Bair	Review correspondence from the insurers re Rule 2004 subpoena service (.1);	0.10	\$90.00
1/23/2024	Jesse Bair	Review the Committee's response to Pacific's request for judicial notice re entry of the mediation order (.1);	0.10	\$90.00
1/23/2024	Jesse Bair	Brief review re the Debtor's third amended complaint (.1); correspondence with Lowenstein re same (.1);	0.20	\$180.00
1/23/2024	Jesse Bair	Correspondence with B. Wiesenberg re insurance archeologist issues (.1);	0.10	\$90.00
1/23/2024	Jesse Bair	Review Order referring case to mediation (.1);	0.10	\$90.00
1/23/2024	Timothy Burns	Review correspondence with B. Weisenberg and J. Bair re joint retention with Debtor of insurance archeologist (.1);	0.10	\$112.00
1/24/2024	Jesse Bair	Correspondence with the debtor re insurance archaeologist issues (.1);	0.10	\$90.00
1/24/2024	Jesse Bair	Review debtor tender letters and the TNCRRG policies in connection with additional insured issues (.2); correspondence with Lowenstein re same (.1);	0.30	\$270.00
1/24/2024	Jesse Bair	Review order granting motion to allow certain late-filed claims (.1);	0.10	\$90.00
1/25/2024	Timothy Burns	Review LMI's reply in support of its motion for reconsideration of the 2004 Order (.2);	0.20	\$224.00
1/25/2024	Jesse Bair	Review correspondence with B. Wiesenberg re initial meeting with the mediators (.1);	0.10	\$90.00
1/25/2024	Jesse Bair	Review correspondence with the Debtor, insurers, and Committee re protective order issues (.1);	0.10	\$90.00
1/25/2024	Jesse Bair	Review LMI's reply brief in support of its Rule 2004 motion for reconsideration (.3);	0.30	\$270.00
1/26/2024	Timothy Burns	Met with J. Bair re upcoming in-person Committee meeting (.1); analysis re hearing prep for LMI's Rule 2004 motion for reconsideration (.1); review correspondence from court and G. Albert re attendance at hearing on same (.1);	0.30	\$336.00
1/26/2024	Jesse Bair	Review correspondence with G. Albert re hearing on LMI's Rule 2004 motion to reconsider (.1); participate in conference with T. Burns re same and upcoming in-person Committee meeting (.1);	0.20	\$180.00
1/26/2024	Timothy Burns	Review Travelers' answer to Third Amended Complaint re insurance adversary (.2);	0.20	\$224.00
1/26/2024	Timothy Burns	Review correspondence with the insurers, debtor, and Lowenstein re protective order revisions (.2);	0.20	\$224.00

1/27/2024	Timothy Burns	Review Chubb's motion to dismiss papers (.2); review CIGA's motion to dismiss papers (.2); review Westport/ERC Answer (.1);	0.50	\$560.00
1/27/2024	Timothy Burns	Review and respond to correspondence from B. Weisenberg re status of insurers' responses to third amended complaint (.1); provide instructions to K. Dempski re creation of tracking chart re insurers' third amended complaint responses (.1);	0.20	\$224.00
1/28/2024	Jesse Bair	Correspondence with B. Weisenberg re in-person Committee meeting and insurance presentation in connection with same (.1);	0.10	\$90.00
1/29/2024	Karen Dempski	Draft tracking chart re the insurers' responses to the Debtor's third amended complaint (.6);	0.60	\$204.00
1/30/2024	Jesse Bair	Correspondence with B. Wiesenberg re Committee insurance overview presentation (.1);	0.10	\$90.00
1/31/2024	Jesse Bair	Additional correspondence with B. Weisenberg re issues in connection with the Committee's insurance overview presentation (.1);	0.10	\$90.00
1/31/2024	Timothy Burns	Review notice of adjournment re LMI's Rule 2004 motion for clarification (.1);	0.10	\$112.00
1/31/2024	Timothy Burns	Review correspondence with the debtor and the insurers re protective order changes and court's directive re same (.2);	0.20	\$224.00
1/31/2024	Timothy Burns	Review correspondence re call with state court counsel re case insurance issues and strategy (.1);	0.10	\$112.00
<b>Totals for Insurance Recovery Activities</b>			<b>39.20</b>	<b>\$33,919.00</b>
<b>Total Hours and Fees</b>			<b>80.20</b>	<b>\$72,023.00</b>

### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/01/2024	Fourth Quarter 2023 PACER	\$227.20
01/08/2024	Delta Airlines, J. Bair (MSN-SFO, Jan. 8-11)	\$2,007.20
01/08/2024	Taxi, J. Bair (airport to hotel)	\$134.10
01/08/2024	United Airlines Inflight WiFi, T. Burns	\$8.00
01/08/2024	Hotel, T. Burns (3 nights)	\$1,489.02
01/08/2024	Hotel, J. Bair (3 nights)	\$1,489.02
01/08/2024	United Airlines, T. Burns (MSN-SFO, Jan. 8-11)	\$1,932.55
01/09/2024	Uber, J. Bair and T. Burns (courthouse to hotel)	\$230.85

01/09/2024	Travel meal, J. Bair	\$26.47
01/09/2024	Travel meal, T. Burns	\$29.65
01/09/2024	Travel meal, T. Burns	\$19.66
01/09/2024	Uber, T. Burns and J. Bair (hotel to courthouse)	\$184.14
01/10/2024	Travel meal, T. Burns	\$19.66
01/11/2024	United Airlines Inflight WiFi, T. Burns	\$8.00
01/11/2024	Uber, T. Burns (hotel to airport)	\$152.23
01/11/2024	Airport parking, J. Bair	\$34.00
01/11/2024	Uber, J. Bair (hotel to airport)	\$163.15
01/11/2024	Travel meal, T. Burns	\$19.66
01/11/2024	Travel meal, T. Burns	\$30.23

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**Total Expenses** **\$8,204.79**

**Timekeeper Summary**

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	Paralegal	1.40	\$340.00	\$476.00
Brenda Horn-Edwards	Paralegal	3.90	\$340.00	\$1,326.00
Jesse Bair	Partner	35.90	\$900.00	\$32,310.00
Karen Dempksi	Paralegal	0.60	\$340.00	\$204.00
Nathan Kuenzi	Associate	9.30	\$550.00	\$5,115.00
Timothy Burns	Partner	29.10	\$1,120.00	\$32,592.00

**Total Due This Invoice: \$80,227.79**



# 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 :** 3/28/2024

**Bill # :** 01377

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/15/2024	Jesse Bair	Review agenda for state court counsel meeting (.1);	0.10	\$90.00
2/15/2024	Jesse Bair	Review T. Burns email memo re outcome of state court counsel meeting (.1);	0.10	\$90.00
2/15/2024	Timothy Burns	Prepare for state court counsel meeting (.1) participate in state court counsel meeting for insurance purposes re case strategy (.4);	0.50	\$560.00
2/16/2024	Jesse Bair	Correspondence with B. Wiesenberg re insurance update for Committee meeting (.1);	0.10	\$90.00
2/22/2024	Timothy Burns	Review correspondence with Lowenstein and state court counsel re mediation session meeting (.1)	0.10	\$112.00
2/23/2024	Jesse Bair	Prepare for Committee meeting (.1);	0.10	\$90.00
2/23/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re mediation strategy (.7);	0.70	\$630.00
2/29/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes re mediation strategy (1.1);	1.10	\$1,232.00
2/29/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case mediation strategy (1.1);	1.10	\$990.00
<b>Totals for Committee Meetings</b>			<b>3.90</b>	<b>\$3,884.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/11/2024	Jesse Bair	Review and edit Burns Bair's first interim fee application (1.9);	1.90	\$1,710.00

2/11/2024	Jesse Bair	Correspondence with the Committee re Burns Bair's first interim fee application (.1);	0.10	\$90.00
2/12/2024	Jesse Bair	Continue drafting exhibits and J. Bair certification in support of Burns Bair's first interim fee application (1.1);	1.10	\$990.00
2/12/2024	Jesse Bair	Correspondence with G. Albert re Burns Bair's first interim fee application (.1);	0.10	\$90.00
2/13/2024	Jesse Bair	Review and respond to G. Albert correspondence re interim fee application issues, including hearing date and objection deadline re same (.2);	0.20	\$180.00
2/13/2024	Jesse Bair	Draft S. Woodall declaration in support of Burns Bair interim fee application (.1);	0.10	\$90.00
2/13/2024	Jesse Bair	Review and edit J. Bair certification in support of Burns Bair interim fee application (.1);	0.10	\$90.00
2/13/2024	Jesse Bair	Review, edit, and finalize Burns Bair's first interim fee application, including all related exhibits and certifications (1.8);	1.80	\$1,620.00
2/13/2024	Jesse Bair	Correspondence with S. Woodall re Burns Bair's first interim fee application (.1);	0.10	\$90.00
2/13/2024	Jesse Bair	Additional correspondence with G. Albert re finalization and filing of Burns Bair's first interim fee application (.1);	0.10	\$90.00
2/13/2024	Brenda Horn-Edwards	Prepare letter to S. Woodall re first interim fee application (.1); correspond with J. Bair re same (.1);	0.20	\$68.00
2/13/2024	Brenda Horn-Edwards	Draft certification of Jesse Bair in support of first interim fee application (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
2/16/2024	Jesse Bair	Correspondence with B. Horn-Edwards and G. Albert re the US Trustee's request for LEDES data in connection with interim fee applications (.1);	0.10	\$90.00
2/23/2024	Jesse Bair	Revise and edit Burns Bair second interim budget and staffing plan (.5);	0.50	\$450.00
2/27/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
2/27/2024	Jesse Bair	Review and edit Burns Bair invoice for inclusion in monthly fee submission (1.5);	1.50	\$1,350.00
2/27/2024	Jesse Bair	Review and edit Burns Bair's monthly fee submission (.2); correspondence with G. Albert re same (.1);	0.30	\$270.00
<b>Totals for Fee Applications</b>			<b>8.80</b>	<b>\$7,472.00</b>

## Hearings

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
2/7/2024	Jesse Bair	Participate in conference with T. Burns re outcome of hearing re LMI's Rule 2004 motion for reconsideration (.2);	0.20	\$180.00
2/7/2024	Timothy Burns	Participate in hearing re LMI's motion to reconsider the Rule 2004 Order (1.8); participate in conference with J. Bair re outcome of hearing (.2);	2.00	\$2,240.00
2/12/2024	Timothy Burns	Participate in insurance status conference (.7);	0.70	\$784.00
<b>Totals for Hearings</b>			<b>2.90</b>	<b>\$3,204.00</b>

## Insurance Recovery Activities

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
2/1/2024	Jesse Bair	Review correspondence with the debtor and the insurers re document production matters (.1);	0.10	\$90.00
2/1/2024	Jesse Bair	Review correspondence with B. Wiesenberg, state court counsel, and T. Burns re case insurance strategy call (.1);	0.10	\$90.00
2/1/2024	Jesse Bair	Review correspondence with B. Wiesenberg and state court counsel re insurance exposure analysis presentation (.1);	0.10	\$90.00
2/2/2024	Jesse Bair	Prepare for call with state court counsel and B. Wiesenberg re case insurance strategy (.1);	0.10	\$90.00
2/2/2024	Jesse Bair	Participate in call with state court counsel and B. Wiesenberg re case insurance strategy (.6);	0.60	\$540.00
2/3/2024	Jesse Bair	Review correspondence with the insurers and C. Restel re the insurers' Rule 2004 document responses (.1);	0.10	\$90.00
2/3/2024	Timothy Burns	Review the US Trustee's brief in Gypsum re insurance neutrality issues in connection with Oakland Plan issues (.8);	0.80	\$896.00
2/3/2024	Timothy Burns	Review B. Weisenberg correspondence and draft email memo re potential insurance demand letter strategy (.7);	0.70	\$784.00
2/3/2024	Timothy Burns	Review correspondence with CNA and Lowenstein re Rule 2004 subpoena issues (.1);	0.10	\$112.00
2/4/2024	Jesse Bair	Brief review re Kaiser Gypsum case in connection with insurer "party in interest" standing (.1);	0.10	\$90.00
2/4/2024	Jesse Bair	Review T. Burns email memo re potential insurance demand letter strategy (.1);	0.10	\$90.00
2/4/2024	Jesse Bair	Brief review re Travelers' answer to the third amended complaint (.1);	0.10	\$90.00
2/4/2024	Jesse Bair	Brief review re Westport's answer to the third amended complaint (.1);	0.10	\$90.00

2/4/2024	Jesse Bair	Review CIGA's motion to dismiss the third amended complaint (.2);	0.20	\$180.00
2/4/2024	Jesse Bair	Review the excess insurers' motion to dismiss the third amended complaint (.2);	0.20	\$180.00
2/4/2024	Jesse Bair	Review Chubb's motion to dismiss the third amended complaint (.2);	0.20	\$180.00
2/4/2024	Jesse Bair	Review Chubb's motion to withdraw the reference (.2); brief review re LMI's motion to withdraw the reference (.1);	0.30	\$270.00
2/4/2024	Jesse Bair	Review AIG's motion to dismiss the third amended complaint (.2);	0.20	\$180.00
2/4/2024	Jesse Bair	Draft email memo to Lowenstein team summarizing status of insurance adversary proceeding (.4);	0.40	\$360.00
2/5/2024	Jesse Bair	Additional analysis and consideration of motion to withdraw the reference issues (.2);	0.20	\$180.00
2/5/2024	Timothy Burns	Brief review of LMI's 2004 exam subpoena responses and objection (.2);	0.20	\$224.00
2/5/2024	Timothy Burns	Brief review of Westport's 2004 exam subpoena responses and objection (.2);	0.20	\$224.00
2/5/2024	Timothy Burns	Review and respond to correspondence from Lowenstein re the insurers' motions to withdraw the reference of coverage adversary (.2);	0.20	\$224.00
2/5/2024	Timothy Burns	Review and respond to correspondence with G. Albert re hearing on LMI's motion to clarify Rule 2004 Order (.1);	0.10	\$112.00
2/5/2024	Timothy Burns	Review J. Bair's email memo re status of insurance adversary proceeding (.1);	0.10	\$112.00
2/5/2024	Timothy Burns	Brief review of insurers' motions to withdraw the reference and accompanying paperwork (.5);	0.50	\$560.00
2/6/2024	Jesse Bair	Additional analysis re motion to withdraw the reference strategy (.1);	0.10	\$90.00
2/7/2024	Jesse Bair	Review correspondence with B. Wisenberg and the Debtor re motion to withdraw the reference issues (.1);	0.10	\$90.00
2/7/2024	Jesse Bair	Review the Debtor's status conference statement (.1);	0.10	\$90.00
2/7/2024	Jesse Bair	Review and consider notice of assignment of LMI's motion to withdraw the reference to Judge Corley (.1); additional analysis re the insurers' motions to withdraw the reference and potential response to same (.2);	0.30	\$270.00
2/7/2024	Timothy Burns	Prepare for hearing re LMI's motion to reconsider the Rule 2004 Order (1.6);	1.60	\$1,792.00

2/7/2024	Timothy Burns	Review and respond to correspondence with Lowenstein and state court counsel re judge assignment in the insurance adversary (.2); review Lowenstein research memo re withdrawal of the reference proceeding (.1);	0.30	\$336.00
2/8/2024	Jesse Bair	Participate in conference with T. Burns re outcome of meet and confer with the Debtor re the insurers' motions to withdraw the reference and strategy in connection with same (.3);	0.30	\$270.00
2/8/2024	Timothy Burns	Participate in conference with Lowenstein re motion to withdraw the reference strategy (.3);	0.30	\$336.00
2/8/2024	Timothy Burns	Participate in meet and confer with the Debtor and Lowenstein re the insurers' motions to withdraw the reference and strategy in connection with same (.5);	0.50	\$560.00
2/8/2024	Timothy Burns	Participate in conference with J. Bair re outcome of meet and confer with the Debtor re the insurers' motions to withdraw the reference and strategy in connection with same (.3);	0.30	\$336.00
2/8/2024	Timothy Burns	Review Continental's objections and responses to Rule 2004 subpoena (.1);	0.10	\$112.00
2/9/2024	Jesse Bair	Review correspondence from state court counsel re judge assignment in the withdrawn insurance adversary proceeding (.1);	0.10	\$90.00
2/9/2024	Jesse Bair	Continue analyzing issues re potential responses to the insurers' motions to withdraw the reference (.1);	0.10	\$90.00
2/10/2024	Jesse Bair	Draft email memorandum to the Committee and state court counsel re status of the insurance adversary proceeding and recommendations re the insurers' motions to dismiss and motions to withdraw the reference (.8);	0.80	\$720.00
2/10/2024	Jesse Bair	Follow-up correspondence with state court counsel re coverage issues and motion to withdraw the reference response (.1);	0.10	\$90.00
2/11/2024	Timothy Burns	Review J. Bair's email memorandum to the Committee and state court counsel re status of the insurance adversary proceeding and recommendations re the insurers' motions to dismiss and motions to withdraw the reference (.2);	0.20	\$224.00
2/12/2024	Timothy Burns	Participate in meet and confer with the insurers and the debtor re withdrawal of the reference issues (.3);	0.30	\$336.00
2/12/2024	Jesse Bair	Prepare for meet and confer with the insurers and the debtor re withdrawal of the reference issues (.1); participate in meet and confer with the debtor and the insurers re same (.3);	0.40	\$360.00

2/12/2024	Jesse Bair	Review correspondence with Lowenstein and T. Burns re strategy for upcoming insurance status conference (.1);	0.10	\$90.00
2/12/2024	Jesse Bair	Review email memo from T. Burns re outcome of insurance status conference (.1);	0.10	\$90.00
2/13/2024	Jesse Bair	Draft email memo to the Committee and state court counsel re outcome of insurance status conference and next-steps (.2); review follow-up correspondence from state court counsel re same (.1);	0.30	\$270.00
2/14/2024	Jesse Bair	Review the Committee's discovery deficiency letter to Westport (.1);	0.10	\$90.00
2/15/2024	Jesse Bair	Correspond with B. Wiesenberg re revised insurance presentation for upcoming mediation session (.1); analysis re potential revision to insurance presentation (.1);	0.20	\$180.00
2/15/2024	Timothy Burns	Review the Committee's discovery deficiency letters re the insurers' 2004 productions to CNA, LMI, and Westport (.3);	0.30	\$336.00
2/16/2024	Jesse Bair	Additional analysis re the Committee's response to the insurers' motions to withdraw the reference (.1);	0.10	\$90.00
2/16/2024	Timothy Burns	Consideration of insurance issues in advance of upcoming Committee meeting (.1); review correspondence with J. Bair and Lowenstein re same (.1);	0.20	\$224.00
2/17/2024	Jesse Bair	Correspondence with B. Wiesenberg re revised insurance presentation for use in connection with upcoming mediation session (.1);	0.10	\$90.00
2/18/2024	Jesse Bair	Review Stout's suggested edits to insurance mediation presentation (.2); review T. Burns' suggested edits to same (.1);	0.30	\$270.00
2/18/2024	Jesse Bair	Review and respond to correspondence with B. Wiesenberg and T. Burns re insurance strategy for upcoming mediation session (.2);	0.20	\$180.00
2/18/2024	Timothy Burns	Review and suggest revisions to claim and insurance valuation PowerPoints for potential use in connection with upcoming mediation session (.4);	0.40	\$448.00
2/19/2024	Jesse Bair	Revise and update insurance presentation for use during upcoming mediation (.4);	0.40	\$360.00
2/19/2024	Jesse Bair	Correspondence with Lowenstein re revised mediation insurance presentation (.1);	0.10	\$90.00
2/19/2024	Jesse Bair	Draft the Committee's response to the insurers' motions to withdraw the reference (.8);	0.80	\$720.00

2/19/2024	Jesse Bair	Review and edit Lowenstein's suggested insert to the Committee's response to the insurers' motions to withdraw the reference (.2); correspondence with B. Wiesenberg re same (.1);	0.30	\$270.00
2/19/2024	Timothy Burns	Review and respond to correspondence with Lowenstein re presentations to the mediators (.2);	0.30	\$336.00
2/20/2024	Timothy Burns	Review LMI's response to the Committee's deficiency letter (.1);	0.10	\$112.00
2/20/2024	Timothy Burns	Review and prepare draft response to C. Restel's email re Travelers' and Lexington's insurance questions (.2);	0.20	\$224.00
2/20/2024	Timothy Burns	Review Century's, Westchester's, and Pacific's responses and objections to the Committee's deficiency letters (.2);	0.20	\$224.00
2/20/2024	Timothy Burns	Review the Committee's draft mediator presentations (.6);	0.60	\$672.00
2/20/2024	Timothy Burns	Review Continental's response to the Committee's deficiency letter (.1);	0.10	\$112.00
2/20/2024	Timothy Burns	Review Westport's response to the Committee's deficiency letter (.1);	0.10	\$112.00
2/20/2024	Jesse Bair	Brief review re Stout mediation presentation re claim values (.1);	0.10	\$90.00
2/21/2024	Timothy Burns	Review and respond to emails re Westport's meet and confer re 2004 subpoena and deficiency letter (.1);	0.10	\$112.00
2/21/2024	Jesse Bair	Review Travelers' Rule 2004 subpoena questions (.1); draft response to same (.1);	0.20	\$180.00
2/21/2024	Jesse Bair	Analyze Lexington coverage and claim exposure (.2);	0.20	\$180.00
2/21/2024	Jesse Bair	Review the Debtor's response to LMI's motion to withdraw the reference (.1);	0.10	\$90.00
2/21/2024	Jesse Bair	Review LMI's Rule 2004 discovery deficiency response letter (.1); review Westport's and Continental's response letters re same (.1);	0.20	\$180.00
2/21/2024	Jesse Bair	Review correspondence with LMI and Westport re discovery meet and confer (.1);	0.10	\$90.00
2/22/2024	Jesse Bair	Correspondence with B. Wiesenberg re call to discuss mediation opening offer (.1);	0.10	\$90.00
2/23/2024	Timothy Burns	Participate in call with Lowenstein, BRG, and J. Bair re mediation strategy and potential opening offer (1.1);	1.10	\$1,232.00
2/23/2024	Jesse Bair	Prepare for Lowenstein meeting re mediation strategy, including review of BRG presentation re assets of the Debtor (.2);	0.20	\$180.00
2/23/2024	Jesse Bair	Participate in call with Lowenstein, BRG, and T. Burns re mediation strategy and potential opening offer (1.1);	1.10	\$990.00

2/26/2024	Timothy Burns	Participate in call with Lowenstein, BRG, and J. Bair re Committee mediation strategy and opening offer (1.2);	1.20	\$1,344.00
2/26/2024	Nathan Kuenzi	Participate in BB team meeting re case updates and ongoing insurance projects (.2);	0.20	\$110.00
2/26/2024	Timothy Burns	Met with J. Bair re case strategy and associate assignments (.3); met with associates re same (.2);	0.50	\$560.00
2/26/2024	Karin Jonch-Clausen	Review 2004 briefing and motion to amend, alter or reconsider briefing to inform research on the insurers' privilege and confidentiality arguments (.8);	0.80	\$440.00
2/26/2024	Jesse Bair	Participate in call with Lowenstein, BRG, and T. Burns re Committee mediation strategy and opening offer (1.2);	1.20	\$1,080.00
2/26/2024	Jesse Bair	Correspondence with N. Kuenzi re research project re LMI's position re non-production of London Broker materials (.1);	0.10	\$90.00
2/26/2024	Jesse Bair	Participate in conference with T. Burns re case status, insurance strategy, and related case projects (.3);	0.30	\$270.00
2/26/2024	Jesse Bair	Participate in BB team meeting re case updates and ongoing insurance projects (.2);	0.20	\$180.00
2/26/2024	Karin Jonch-Clausen	Research the application of attorney-client privilege to claims file in connection with the insurers' privilege arguments (1.0);	1.00	\$550.00
2/27/2024	Karin Jonch-Clausen	Research the applicability of work product protection to claims file in connection with the insurers' privilege arguments (1.5);	1.50	\$825.00
2/27/2024	Karin Jonch-Clausen	Research the applicability of trade secret privilege in connection with the insurers' privilege arguments (1.4);	1.40	\$770.00
2/27/2024	Jesse Bair	Review and respond to correspondence with the Debtor re responses to the insurers' motions to dismiss (.2);	0.20	\$180.00
2/28/2024	Timothy Burns	Participate in call with Lowenstein re case strategy and mediation (.5);	0.50	\$560.00
2/28/2024	Timothy Burns	Review the insurers' objection re protective order (.2);	0.20	\$224.00
2/28/2024	Karin Jonch-Clausen	Supplemental research re the application of attorney client privilege to claims files and loss reserves in connection with the insurers' privilege arguments (2.0);	2.00	\$1,100.00
2/28/2024	Karin Jonch-Clausen	Draft research memo to J. Bair and T. Burns assessing the insurers' privilege arguments (2.1);	2.10	\$1,155.00
2/29/2024	Timothy Burns	Participate in call with B. Weisenberg re mediation preparation and insurance (.5);	0.50	\$560.00
2/29/2024	Timothy Burns	Participate in call with B. Weisenberg re LMI appeal (.1); met with J. Bair re same (.1);	0.20	\$224.00



2/29/2024	Timothy Burns	Participate in mediation strategy meeting with Lowenstein, BRG and J. Bair (1.0);	1.00	\$1,120.00
2/29/2024	Timothy Burns	Prepare for upcoming mediation session (.7);	0.70	\$784.00
2/29/2024	Timothy Burns	Participate in call with B. Weisenberg re preparations for upcoming mediation session (.3);	0.30	\$336.00
2/29/2024	Jesse Bair	Prepare for mediation strategy meeting with Lowenstein, BRG and T. Burns (.1);	0.10	\$90.00
2/29/2024	Jesse Bair	Participate in mediation strategy meeting with Lowenstein, BRG and T. Burns (1.0);	1.00	\$900.00
2/29/2024	Jesse Bair	Review correspondence with LMI and C. Restel re hearing on LMI's motion to shorten time re LMI's motion for stay pending appeal (.1); participate in conference with T. Burns re LMI appeal issues (.1);	0.20	\$180.00
<b>Totals for Insurance Recovery Activities</b>			<b>38.60</b>	<b>\$34,956.00</b>

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**Total Hours and Fees** **54.20** **\$49,516.00**

**Timekeeper Summary**

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	0.80	\$340.00	\$272.00
Jesse Bair	Partner	24.70	\$900.00	\$22,230.00
Karin Jonch-Clausen	Associate	8.80	\$550.00	\$4,840.00
Nathan Kuenzi	Associate	0.20	\$550.00	\$110.00
Timothy Burns	Partner	19.70	\$1,120.00	\$22,064.00

**Total Due This Invoice: \$49,516.00**

# 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 :** 4/30/2024

**Bill # :** 01404

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/1/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re mediation strategy (.5);	0.50	\$450.00
3/12/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation strategy and draft term sheet (1.2);	1.20	\$1,080.00
3/12/2024	Timothy Burns	Participate in state court counsel meeting re mediation and insurance issues (1.2);	1.20	\$1,344.00
3/28/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes (1.0);	1.00	\$1,120.00
<b>Totals for Committee Meetings</b>			<b>3.90</b>	<b>\$3,994.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/19/2024	Jesse Bair	Prepare for hearing re interim professional fee applications (.3);	0.30	\$270.00
3/20/2024	Jesse Bair	Correspond with the Debtor re omnibus order approving professional fees (.1);	0.10	\$90.00
3/28/2024	Jesse Bair	Analysis of Burn Bair invoice for privilege and confidential information (.4);	0.40	\$360.00
3/28/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
3/28/2024	Jesse Bair	Correspond with B. Horn re Burns Bair monthly fee submission (.1);	0.10	\$90.00
3/29/2024	Jesse Bair	Edit and finalize Burns Bair's monthly fee application, including correspondence with G. Albert re same (.2);	0.20	\$180.00
<b>Totals for Fee Applications</b>			<b>1.40</b>	<b>\$1,092.00</b>

## Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/19/2024	Jesse Bair	Participate in hearing re interim professional fee applications (.9);	0.90	\$810.00
3/21/2024	Timothy Burns	Review 3/19/24 hearing transcript re hearing in main case (.3);	0.30	\$336.00
<b>Totals for Hearings</b>			<b>1.20</b>	<b>\$1,146.00</b>

## Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/1/2024	Jesse Bair	Brief review re CNA's Rule 2004 written responses and objections (.2);	0.20	\$180.00
3/1/2024	Jesse Bair	Review correspondence from American Home re objections to the Committee's Rule 2004 subpoena (.1);	0.10	\$90.00
3/1/2024	Jesse Bair	Review Travelers correspondence re Travelers' upcoming Rule 2004 production (.1);	0.10	\$90.00
3/1/2024	Jesse Bair	Brief review re Chubb's Rule 2004 written responses and objections (.1);	0.10	\$90.00
3/1/2024	Timothy Burns	Review correspondence with Lowenstein and insurer counsel re document production issues (.1);	0.10	\$112.00
3/1/2024	Jesse Bair	Prepare for Committee meeting re mediation strategy (.2);	0.20	\$180.00
3/2/2024	Jesse Bair	Review California case law re non-admitted insurers and bond-posting requirements under Cal. Insurance Section 1616 and brief review re California admitted insurers list (.1);	0.10	\$90.00
3/2/2024	Timothy Burns	Review and draft response to American Home re its compliance with the Committee's Rule 2004 requests and circulate same to Lowenstein (.5);	0.50	\$560.00
3/2/2024	Timothy Burns	Review the Committee's Response to LMI's Motion to Shorten Time re LMI's Motion for Stay Pending Appeal re the Rule 2004 Order (.1);	0.10	\$112.00
3/2/2024	Timothy Burns	Review and respond to follow up correspondence from C. Restel re draft response to American Home re Rule 2004 compliance (.1);	0.10	\$112.00
3/2/2024	Jesse Bair	Review and consider various correspondence with American Home, Lowenstein, and T. Burns re American Home's Rule 2004 subpoena objection and the Committee's response to same (.2);	0.20	\$180.00

3/2/2024	Jesse Bair	Review correspondence with C. Restel and LMI re hearing date on LMI's motion to shorten time (.1);	0.10	\$90.00
3/2/2024	Timothy Burns	Provide instructions to A. Turgeon re historical debtor policies organization project (.2);	0.20	\$224.00
3/2/2024	Timothy Burns	Review correspondence with LMI and Lowenstein re hearing on LMI's ex parte motion to shorten time (.2);	0.20	\$224.00
3/3/2024	Timothy Burns	Review materials re sexual abuse case consolidation for trial received from state court counsel in connection with potential insurance strategies in case (.8);	0.80	\$896.00
3/4/2024	Alyssa Turgeon	Organize and index debtor historical insurance policy collection (1.9);	1.90	\$646.00
3/4/2024	Nathan Kuenzi	Research issues relating to LMI and discovery of materials allegedly held by the London brokers in connection with LMI's Rule 2004 objections (3.1); draft email memorandum for J. Bair and T. Burns summarizing research results (.7);	3.80	\$2,090.00
3/4/2024	Jesse Bair	Review correspondence from CNA, Travelers, Chubb, and LMI re Rule 2004 document productions and correspond with BB team re review of same (.2); correspondence with C. Restel re same (.1);	0.30	\$270.00
3/4/2024	Nathan Kuenzi	Analyze insurance coverage during CNA and LMI periods in connection with insurance exposure analysis (.3);	0.30	\$165.00
3/4/2024	Jesse Bair	Review American Home correspondence re Rule 2004 objections (.1);	0.10	\$90.00
3/4/2024	Timothy Burns	Review additional correspondence with LMI and C. Restel re LMI's hearing on Motion to Shorten (.1);	0.10	\$112.00
3/4/2024	Timothy Burns	Review correspondence from American Home re scope of discovery (.1);	0.10	\$112.00
3/4/2024	Jesse Bair	Provide supplemental instructions to K. Jonch-Clausen re research needed re California Insurance Section 1616 (.1);	0.10	\$90.00
3/4/2024	Karin Jonch-Clausen	Research and analyze case law re non-admitted insurers, California Insurance Code Section 1616, and bond-posting requirements in connection with same, with particular focus on foreign entities such as LMI (3.2);	3.20	\$1,760.00
3/4/2024	Timothy Burns	Review N. Kuenzi's legal research memo re LMI discovery issues in connection with London brokers (.2);	0.20	\$224.00

3/5/2024	Timothy Burns	Review correspondence from Chubb re Chubb's Rule 2004 document production (.1); review correspondence with the Committee professionals re the insurers' document productions (.1);	0.20	\$224.00
3/5/2024	Timothy Burns	Review LMI's letter re motion to quash (.1);	0.10	\$112.00
3/5/2024	Jesse Bair	Review and edit draft insurance term sheet request for use in mediation (.8);	0.80	\$720.00
3/5/2024	Nathan Kuenzi	Conduct first-level review of insurance documents recently produced by CNA in response to the Committee's Rule 2004 requests (1.1);	1.10	\$605.00
3/5/2024	Timothy Burns	Review American Home's motion for protective order (.2);	0.20	\$224.00
3/5/2024	Jesse Bair	Review the Debtor's draft opposition to CIGA's motion to dismiss (.3); correspondence with the Debtor re same and Committee joinder (.1);	0.40	\$360.00
3/5/2024	Alyssa Turgeon	Continue organizing and indexing debtor historical insurance policy collection (2.2);	2.20	\$748.00
3/5/2024	Timothy Burns	Review correspondence with LMI and Lowenstein re briefing schedule re LMI's motion for protective order (.1);	0.10	\$112.00
3/5/2024	Timothy Burns	Review LMI document production while formulating partial summary judgment strategy based on reservations of rights made by LMI (2.3);	2.30	\$2,576.00
3/5/2024	Timothy Burns	Review correspondence with LMI and Lowenstein re LMI's motion to quash (.1);	0.10	\$112.00
3/5/2024	Brian Cawley	Participate in conference with J. Bair and BB team re insurance Rule 2004 first-level document review project (.3);	0.30	\$165.00
3/5/2024	Karin Jonch-Clausen	Conduct first-level review of insurance documents recently produced by CNA in response to the Committee's Rule 2004 requests (1.8);	1.80	\$990.00
3/5/2024	Jesse Bair	Review and edit the Committee's draft opposition to LMI's motion to stay Rule 2004 Order pending appeal (.4); review correspondence with C. Restel and T. Burns re suggested additional edits to same (.1);	0.50	\$450.00
3/5/2024	Brian Cawley	Conduct first-level review of insurance documents recently produced by Westport in response to the Committee's Rule 2004 requests (2.8);	2.80	\$1,540.00
3/5/2024	Karin Jonch-Clausen	Conduct first-level review of insurance documents recently produced by Travelers in response to the Committee's Rule 2004 requests (1.6);	1.60	\$880.00

3/5/2024	Timothy Burns	Review J. Bair's suggested edits to the Committee's opposition to LMI's motion to stay and related correspondence with J. Bair and C. Restel re same (.2);	0.20	\$224.00
3/5/2024	Nathan Kuenzi	Participate in additional conference with J. Bair re first level review of the insurers' Rule 2004 document productions (.2);	0.20	\$110.00
3/5/2024	Timothy Burns	Correspondence with Lowenstein and Burns Bair team re LMI's reservation of rights letter analysis (.2);	0.20	\$224.00
3/5/2024	Timothy Burns	Participate in call with J. Bair re Committee joinder in debtor's opposition to CIGA motion to dismiss (.1); review correspondence with Committee professionals re same (.1);	0.20	\$224.00
3/5/2024	Timothy Burns	Review correspondence from B. Weisenberg re mediation plan term sheet (.2);	0.20	\$224.00
3/5/2024	Jesse Bair	Draft the Committee's joinder to the Debtor's opposition to CIGA's motion to dismiss and email G. Albert re same (.2);	0.20	\$180.00
3/5/2024	Karin Jonch-Clausen	Participate in conference with J. Bair and BB team re insurance Rule 2004 first-level document review project (.3);	0.30	\$165.00
3/5/2024	Timothy Burns	Brief review re N. Kuenzi's summary of the insurers' recent Rule 2004 document productions (.2);	0.20	\$224.00
3/5/2024	Timothy Burns	Review additional correspondence from B. Weisenberg re mediation plan term sheet issues (.1);	0.10	\$112.00
3/5/2024	Timothy Burns	Review and revise the Committee's response to LMI's motion for stay pending appeal (.6);	0.60	\$672.00
3/5/2024	Karin Jonch-Clausen	Conduct first-level review of insurance documents recently produced by Chubb in response to the Committee's Rule 2004 requests (3.5);	3.50	\$1,925.00
3/5/2024	Timothy Burns	Review and revise draft term sheet for upcoming mediation session (.5);	0.50	\$560.00
3/5/2024	Jesse Bair	Review correspondence from Westport and Chubb re their Rule 2004 productions (.1);	0.10	\$90.00
3/5/2024	Nathan Kuenzi	Conduct first-level review of insurance documents recently produced by Travelers in response to the Committee's Rule 2004 requests (.3);	0.30	\$165.00
3/5/2024	Timothy Burns	Correspondence with Lowenstein and J. Bair re strategic issues relating to upcoming mediation (.2);	0.20	\$224.00

3/5/2024	Timothy Burns	Analysis of overall case strategy and insurance strategy in connection with preparations for upcoming mediation session (2.7);	2.70	\$3,024.00
3/5/2024	Brian Cawley	Conduct first-level review of insurance documents recently produced by Chubb and CNA in response to the Committee's Rule 2004 requests (2.1);	2.10	\$1,155.00
3/5/2024	Jesse Bair	Participate in call with Lowenstein and T. Burns re draft insurance term sheet and mediation strategy (.7);	0.70	\$630.00
3/5/2024	Timothy Burns	Prepare for call with Lowenstein and J. Bair re draft plan term sheet and mediation issues (.2); participate in post-call with J. Bair re follow-up tasks in connection with same (.2);	0.40	\$448.00
3/5/2024	Jesse Bair	Participate in additional conference with N. Kuenzi re initial review of the insurers' Rule 2004 document productions (.2);	0.20	\$180.00
3/5/2024	Timothy Burns	Review correspondence with LMI and Lowenstein re production issues in connection with Rule 2004 subpoena (.1);	0.10	\$112.00
3/5/2024	Timothy Burns	Review and analyze LMI's motion for protective order (.5);	0.50	\$560.00
3/5/2024	Nathan Kuenzi	Conduct first-level review of insurance documents recently produced by LMI in response to the Committee's Rule 2004 requests (1.3);	1.30	\$715.00
3/5/2024	Nathan Kuenzi	Participate in conference with J. Bair and BB team re insurance Rule 2004 first-level document review project (.3);	0.30	\$165.00
3/5/2024	Jesse Bair	Participate in call with T. Burns re potential additional changes to the draft term sheet (.2);	0.20	\$180.00
3/5/2024	Jesse Bair	Analysis re parameters and structure for first level review of the carriers' rule 2004 production (.2); provide instructions to BB team re same (.3);	0.50	\$450.00
3/5/2024	Jesse Bair	Review and respond to correspondence with Westport and Lowenstein re discovery meet and confer (.1);	0.10	\$90.00
3/5/2024	Nathan Kuenzi	Conduct first-level review of insurance documents recently produced by Chubb in response to the Committee's Rule 2004 requests (3.4);	3.40	\$1,870.00
3/5/2024	Nathan Kuenzi	Draft summary of first level review of all insurer Rule 2004 productions received to date (1.9);	1.90	\$1,045.00
3/5/2024	Timothy Burns	Participate in call with Lowenstein and J. Bair re draft insurance term sheet and mediation strategy (.7);	0.70	\$784.00

3/6/2024	Timothy Burns	Prepare for upcoming mediation session, with focus on insurance strategy and draft term sheet (.5);	0.50	\$560.00
3/6/2024	Timothy Burns	Correspondence with B. Weisenberg re changes to draft term sheet for mediation (.2);	0.20	\$224.00
3/6/2024	Jesse Bair	Analyze summary of first level review of the insurers' Rule 2004 productions (.3); correspond with Lowenstein re same (.1);	0.40	\$360.00
3/6/2024	Jesse Bair	Review C. Restel email memo re status of all LMI Rule 2004-related motions and objections (.1);	0.10	\$90.00
3/6/2024	Jesse Bair	Review and respond to additional correspondence with Westport re discovery meet and confer (.1);	0.10	\$90.00
3/6/2024	Jesse Bair	Review T. Burns email memo re case insurance mediation strategy (.1);	0.10	\$90.00
3/6/2024	Jesse Bair	Review correspondence with CNA and the Debtor re motion to dismiss briefing issues (.1);	0.10	\$90.00
3/7/2024	Jesse Bair	Review and consider T. Burns email memo re potential alternative Plan term sheet structure (.2);	0.20	\$180.00
3/7/2024	Timothy Burns	Draft email memo re potential alternative Plan term sheet structure, with particular focus on case insurance issues (1.2);	1.20	\$1,344.00
3/7/2024	Jesse Bair	Correspond with the Debtor re motion to dismiss issues (.1);	0.10	\$90.00
3/7/2024	Jesse Bair	Review and respond to correspondence with B. Weisenberg re upcoming mediation session (.1);	0.10	\$90.00
3/8/2024	Jesse Bair	Participate in call with M. Kaplan re outcome of Rule 2004 meet and confer and next-steps in response to same (.2);	0.20	\$180.00
3/8/2024	Jesse Bair	Participate in discovery meet and confer with Westport and Lowenstein (.5);	0.50	\$450.00
3/8/2024	Timothy Burns	Review stipulation to shorten time and related filings (.1);	0.10	\$112.00
3/8/2024	Jesse Bair	Review revised draft term sheet circulated by B. Wiesenberg in advance of mediation (.2);	0.20	\$180.00
3/8/2024	Jesse Bair	Prepare for discovery meet and confer with Westport (.1);	0.10	\$90.00
3/8/2024	Timothy Burns	Continue preparing for upcoming mediation session, with focus on insurance strategy and draft term sheet (.6);	0.60	\$672.00
3/8/2024	Timothy Burns	Review and revise the Committee's objection to LMI's motion for leave to appeal (.9);	0.90	\$1,008.00



3/9/2024	Jesse Bair	Review Chubb letter to the Committee re Chubb's Rule 2004 production and related correspondence with M. Kaplan re same (.1);	0.10	\$90.00
3/9/2024	Jesse Bair	Review K. Jonch-Clausen's email memo re case law in connection with the insurers' privilege and confidentiality discovery objections (.2);	0.20	\$180.00
3/9/2024	Jesse Bair	Brief review re Chubb's categorical privilege log (.1);	0.10	\$90.00
3/9/2024	Jesse Bair	Review and respond to correspondence with the Debtor re oppositions to the insurers' motions to dismiss (.1);	0.10	\$90.00
3/10/2024	Nathan Kuenzi	Review and analyze Chubb privilege log (.3);	0.30	\$165.00
3/10/2024	Jesse Bair	Review N. Kuenzi email memo re discoverability of London Broker research and brief review of case law cited therein (.2);	0.20	\$180.00
3/10/2024	Timothy Burns	Review correspondence with debtor's and insurers' counsel re motion to dismiss briefing and hearing (.1);	0.10	\$112.00
3/10/2024	Timothy Burns	Review Chubb's document production letter (.1); brief review review re Chubb's categorical privilege log and correspond with J. Bair re potential response to same (.2);	0.30	\$336.00
3/11/2024	Timothy Burns	Review correspondence from LMI re hearing on LMI's various 2004-related motions (.1);	0.10	\$112.00
3/11/2024	Jesse Bair	Participate in conference with T. Burns re remediation and Plan term-sheet strategy (.4);	0.40	\$360.00
3/11/2024	Karin Jonch-Clausen	Research California case law and statutes re direct action insurance rights and parameters of same (1.3); draft email memo summarizing research re same (.2);	1.50	\$825.00
3/11/2024	Jesse Bair	Review various correspondence with LMI re hearing issues on LMI's numerous Rule 2004-related motions (.1);	0.10	\$90.00
3/11/2024	Karin Jonch-Clausen	Analyze and draft summary of POCs alleging abuse during uninsured or underinsured periods of the Debtor's coverage program (3.1);	3.10	\$1,705.00
3/11/2024	Jesse Bair	Participate in conference with BB team re case status and related insurance projects (.3);	0.30	\$270.00

3/11/2024	Timothy Burns	Met with BB team re case status, strategy and related assignments (.3); review K. Jonch-Clausen email memo re parameters of direct action rights under California law and brief review re cited case law (.2);	0.50	\$560.00
3/11/2024	Jesse Bair	Brief review re K. Jonch-Clausen's preliminary research results re direct action rights under California law (.1);	0.10	\$90.00
3/11/2024	Jesse Bair	Additional analysis re the Debtor's underinsured exposure in advance of upcoming mediation (.2);	0.20	\$180.00
3/11/2024	Timothy Burns	Prepare for call with state court counsel re mediation issues (.2); participate in call with state court counsel re mediation issues and strategy (.4); participate in conference with J. Bair re mediation and Plan term-sheet strategy (.4);	1.00	\$1,120.00
3/11/2024	Timothy Burns	Review K. Jonch-Clausen factual analysis re claims alleging abuse in uninsured or underinsured periods (.2);	0.20	\$224.00
3/11/2024	Karin Jonch-Clausen	Participate in conference with BB team re case status and related insurance projects (.3);	0.30	\$165.00
3/12/2024	Jesse Bair	Prepare for state court counsel meeting re mediation strategy and plan term sheet issues (.1);	0.10	\$90.00
3/12/2024	Jesse Bair	Additional review of the insurers' motions to dismiss the debtor's third amended complaint (.3);	0.30	\$270.00
3/12/2024	Jesse Bair	Draft the Committee's joinder in support of the Debtor's oppositions to the insurers' motions to dismiss the third amended complaint (1.5);	1.50	\$1,350.00
3/12/2024	Timothy Burns	Prepare for state court counsel meeting re mediation and insurance issues (.4);	0.40	\$448.00
3/12/2024	Jesse Bair	Correspondence with the debtor re the debtor's and committee's response to the insurers' motions to dismiss (.1);	0.10	\$90.00
3/13/2024	Timothy Burns	Met with J. Bair re insurance Plan strategy (.2);	0.20	\$224.00
3/13/2024	Jesse Bair	Review the debtor's draft response to the excess insurers' motion to dismiss (.3);	0.30	\$270.00
3/13/2024	Jesse Bair	Review and respond to correspondence with C. Restel re call to discuss motion to compel issues (.1);	0.10	\$90.00
3/13/2024	Jesse Bair	Additional analysis re insurance Plan issues in advance of upcoming mediation session (.2);	0.20	\$180.00
3/13/2024	Jesse Bair	Participate in conference with T. Burns re insurance Plan strategy (.2);	0.20	\$180.00

3/13/2024	Brian Cawley	Continue reviewing insurer Rule 2004 productions in connection with ongoing Rule 2004 issues (.3);	0.30	\$165.00
3/13/2024	Jesse Bair	Review the debtor's draft response to Westchester's motion to dismiss (.2);	0.20	\$180.00
3/13/2024	Jesse Bair	Edit and finalize the Committee's joinder in support of the debtor's objections to the insurers' motions to dismiss (.2); correspondence with G. Albert re same (.1);	0.30	\$270.00
3/13/2024	Jesse Bair	Correspondence with Lowenstein and G. Albert re motion to withdraw the reference hearing (.1);	0.10	\$90.00
3/14/2024	Brian Cawley	Research and analyze California case law re excess insurer bad faith and the parameters of same (2.6);	2.60	\$1,430.00
3/14/2024	Jesse Bair	Review correspondence with the debtor, CNA, and the court re hearing and briefing issues on the insurers' motions to dismiss (.1);	0.10	\$90.00
3/14/2024	Jesse Bair	Review and edit pro hac vice applications for insurance district court actions and correspond with G. Albert and C. M Mitsuoka re same (.2);	0.20	\$180.00
3/15/2024	Jesse Bair	Review correspondence from Travelers re its Rule 2004 production and responses (.1);	0.10	\$90.00
3/15/2024	Jesse Bair	Correspond with Westport re the scope of the Committee's Rule 2004 requests (.1);	0.10	\$90.00
3/15/2024	Timothy Burns	Continue preparing for upcoming mediation session by reviewing case insurance overview (.2);	0.20	\$224.00
3/15/2024	Timothy Burns	Met with J. Bair re potential motion to compel and the insurers' motions to withdraw the reference (.2);	0.20	\$224.00
3/15/2024	Timothy Burns	Review correspondence with the debtor, carriers, and J. Bair re motion to withdraw reference hearing (.1);	0.10	\$112.00
3/15/2024	Jesse Bair	Review US Fire's production and written responses to the Committee's Rule 2004 subpoena (.1);	0.10	\$90.00
3/15/2024	Jesse Bair	Prepare for conference with Lowenstein team re the insurers' document production status and motion to compel issues (.1); participate in conference with Lowenstein team re same (.4);	0.50	\$450.00
3/15/2024	Jesse Bair	Correspond with BB team re finalizing and filing Burns Bair pro hac vice submissions (.1);	0.10	\$90.00

3/15/2024	Brian Cawley	Research and analyze California case law re insurer bad faith in the context of multi-insurer towers and parameters of same (2.1);	2.10	\$1,155.00
3/15/2024	Jesse Bair	Review LMI's statement of non-objection to the insurers' motions to withdraw the reference (.1); correspondence with the carriers and debtor re hearing issues in connection with same (.1);	0.20	\$180.00
3/15/2024	Jesse Bair	Participate in conference with T. Burns re Rule 2004 motion to compel issues and motion to withdraw the reference hearing (.2);	0.20	\$180.00
3/17/2024	Jesse Bair	Brief review of Chubb's Rule 2004 line item privilege log and correspond with BB team re analysis needed of same and Chubb's supplemental document production (.2);	0.20	\$180.00
3/18/2024	Timothy Burns	Participate in pre-mediation meeting with Committee professionals re mediation strategy (1.0);	1.00	\$1,120.00
3/18/2024	Brian Cawley	Begin reviewing newly produced Chubb documents (.8);	0.80	\$440.00
3/18/2024	Jesse Bair	Brief review of the Committee's Rule 2004 motion to compel and correspond with N. Kuenzi re factual analysis needed in connection with same (.1);	0.10	\$90.00
3/18/2024	Nathan Kuenzi	Analyze Westport production materials for underwriting materials and draft summary email for J. Bair (.8);	0.80	\$440.00
3/18/2024	Nathan Kuenzi	Revise and edit portion of the Committee's motion to compel regarding factual assertions concerning the insurers' document productions to date (.6);	0.60	\$330.00
3/18/2024	Nathan Kuenzi	Draft summary of findings from recent production of Chubb supplemental materials (.2);	0.20	\$110.00
3/18/2024	Timothy Burns	Continue preparing for mediation by reviewing case insurance materials and draft term sheets and formulating strategy for day 1 of mediation (.9);	0.90	\$1,008.00
3/18/2024	Timothy Burns	Participate in full-day mediation session (7.7);	7.70	\$8,624.00
3/18/2024	Jesse Bair	Review correspondence and Order from the Court re status conference on New Jersey motion to quash action (.1);	0.10	\$90.00
3/18/2024	Jesse Bair	Review the district court's order withdrawing the reference (.1); draft insurance case update email to the Committee (.2);	0.30	\$270.00

3/18/2024	Karen DempSKI	Revise and edit pro hac vice applications for J. Bair and T. Burns in the insurance district court actions (.4); email J. Bair re same (.1); finalize and file with court (.2);	0.70	\$238.00
3/18/2024	Nathan Kuenzi	Review and analyze portion of newly produced Chubb documents (.8);	0.80	\$440.00
3/18/2024	Timothy Burns	Participate in post-mediation meeting with Committee professionals in preparation for Day 2 of mediation (.6);	0.60	\$672.00
3/18/2024	Timothy Burns	Prepare for Day 2 of mediation (.7);	0.70	\$784.00
3/18/2024	Jesse Bair	Correspondence with BB team re review needed of Chubb's supplemental document production (.1);	0.10	\$90.00
3/19/2024	Jesse Bair	Review and edit the Committee's motion to compel compliance with insurance Rule 2004 subpoena (.7);	0.70	\$630.00
3/19/2024	Timothy Burns	Listen to SCOTUS oral argument re insurance neutrality issues (.1);	0.10	\$112.00
3/19/2024	Timothy Burns	Participate in full-day mediation session (9.0);	9.00	\$10,080.00
3/20/2024	Timothy Burns	Updated J. Bair re mediation developments and discussed next steps (.2);	0.20	\$224.00
3/20/2024	Jesse Bair	Participate in call with T. Burns re outcome of first mediation session (.2);	0.20	\$180.00
3/20/2024	Brian Cawley	Continue detailed research and analysis re excess insurer bad faith and insurer bad faith in the context of multi-insurer towers and parameters of same (2.9);	2.90	\$1,595.00
3/21/2024	Jesse Bair	Participate in conference with T. Burns re outcome of call with Lowenstein re case insurance and mediation strategy (.2);	0.20	\$180.00
3/21/2024	Jesse Bair	Review US Fire correspondence re the Committee's motion to compel and correspond with C. Restel re same and Westport issues (.2);	0.20	\$180.00
3/21/2024	Timothy Burns	Review US Fire's request to withdraw motion to compel (.1);	0.10	\$112.00
3/21/2024	Timothy Burns	Reviewed order regarding motions to dismiss in adversary proceeding (.1);	0.10	\$112.00
3/21/2024	Timothy Burns	Participate in call with J. Prol re mediation strategy (.4); met with J. Bair re same (.1);	0.50	\$560.00
3/21/2024	Timothy Burns	Review and respond to J. Bair correspondence re motion to compel re Westport Ins. Co. (.2);	0.20	\$224.00
3/21/2024	Brian Cawley	Analyze debtor policy documents concerning specifics of duty to cooperate, right to associate, duty to defend, and consent to settle provisions (2.3);	2.30	\$1,265.00

3/21/2024	Timothy Burns	Review correspondence with Debtor and Committee re next mediation session (.1);	0.10	\$112.00
3/21/2024	Brian Cawley	Research and analyze California case law re excess insurer right to participate in and/or control defense (2.6);	2.60	\$1,430.00
3/22/2024	Jesse Bair	Review various correspondence with US Fire, CNA, Westport, and Lowenstein re various motion to compel issues (.3);	0.30	\$270.00
3/22/2024	Nathan Kuenzi	Review CNA production re claims file materials (.5);	0.50	\$275.00
3/22/2024	Jesse Bair	Participate in call with Lowenstein re responding to Westport's motion to compel opposition and related motion to compel issues with other insurers (.4);	0.40	\$360.00
3/22/2024	Timothy Burns	Conference with J. Bair re motion to compel issues and overall insurance strategy (.2);	0.20	\$224.00
3/22/2024	Nathan Kuenzi	Review CNA correspondence regarding discovery issues (.2); analyze CNA production of materials to date (.4); respond to J. Bair with details of production (.2);	0.80	\$440.00
3/22/2024	Jesse Bair	Analysis re US Fire coverage position and correspond with the Debtor re same (.2); participate in conference with T. Burns re motion to compel issues and overall insurance strategy (.2);	0.40	\$360.00
3/22/2024	Brian Cawley	Research excess insurer duty to defend issues in context of multi-insurer claim (1.7);	1.70	\$935.00
3/23/2024	Jesse Bair	Review correspondence with CNA re document production status (.1);	0.10	\$90.00
3/23/2024	Jesse Bair	Review the excess insurers' reply in support of motion to dismiss the debtor's third amended complaint (.3);	0.30	\$270.00
3/24/2024	Timothy Burns	Brief review of Certain Excess Insurers Reply in Support of Motion to Dismiss (.2); email to internal team re status hearing preparation (.1);	0.30	\$336.00
3/24/2024	Timothy Burns	Review multiple correspondence between Westport and Committee counsel re discovery hearing and meet and confer (.2);	0.20	\$224.00
3/24/2024	Nathan Kuenzi	Review materials relevant to pending MTD hearing and pending motion to compel/quash hearing (.4);	0.40	\$220.00
3/24/2024	Timothy Burns	Review internal BB correspondence re Continental's document production (.1);	0.10	\$112.00
3/24/2024	Timothy Burns	Review correspondence with US Fire and Lowenstein re discovery compliance (.2);	0.20	\$224.00
3/24/2024	Timothy Burns	Brief review of Westport's Responses and Objections to the Committee's document requests and privilege log (.5);	0.50	\$560.00

3/24/2024	Timothy Burns	Brief review of American Home motion to withdraw the reference brief and declaration (.2);	0.20	\$224.00
3/24/2024	Timothy Burns	Review various correspondence with the mediator, Debtor, and Lowenstein re subsequent mediation sessions (.2);	0.20	\$224.00
3/24/2024	Timothy Burns	Review Chubb's Reply in Support of Its Motion to Dismiss (.2);	0.20	\$224.00
3/24/2024	Timothy Burns	Review additional correspondence with the insurers re 2004 production and motions to compel (.2);	0.20	\$224.00
3/25/2024	Jesse Bair	Participate in call with Lowenstein and state court counsel re case status and mediation strategy (.2);	0.20	\$180.00
3/25/2024	Nathan Kuenzi	Participate in BB team meeting re case status and ongoing insurance projects (.1);	0.10	\$55.00
3/25/2024	Timothy Burns	Met with internal team re case strategy, developments, and assignments (.1);	0.10	\$112.00
3/25/2024	Jesse Bair	Participate in BB team meeting re case status and ongoing insurance projects (.1);	0.10	\$90.00
3/25/2024	Karin Jonch-Clausen	Conduct supplemental research re direct action rights under California law (.6); draft summary for T. Burns re same (.2);	0.80	\$440.00
3/26/2024	Brian Cawley	Begin drafting memorandum re parameters of bad faith failure to settle issues with respect to multi-insurer and multi-year claims (2.2);	2.20	\$1,210.00
3/26/2024	Jesse Bair	Review LMI's designation of Rule 2004 record on appeal and assess potential supplementation of same by Committee (.3);	0.30	\$270.00
3/26/2024	Nathan Kuenzi	Analyze Chubb's Rule 2004 privilege log (1.3);	1.30	\$715.00
3/26/2024	Jesse Bair	Review and edit the Committee's opposition to AHAC's motion to quash Rule 2004 subpoena (.7);	0.70	\$630.00
3/26/2024	Nathan Kuenzi	Analyze and identify key cases for preparation for upcoming hearing on various Rule 2004 -related motions (2.4);	2.40	\$1,320.00
3/26/2024	Alyssa Turgeon	Prepare mediation preparation binder for next mediation session (.5);	0.50	\$170.00
3/26/2024	Jesse Bair	Review and respond to various correspondence with the debtor, Westport, and Lowenstein re motion compel hearing issues (.2);	0.20	\$180.00
3/26/2024	Timothy Burns	Review multiple emails with the insurers, Lowenstein and J. Bair re hearing on motions to compel (.2); email to internal team re preparations for hearing (.1);	0.30	\$336.00

3/26/2024	Timothy Burns	Review proposed LMI record on appeal and correspondence with Lowenstein and J. Bair re same (.2);	0.20	\$224.00
3/26/2024	Jesse Bair	Correspond with Lowenstein and T. Burns re district court insurance status conference and status conference statement in connection with same (.1);	0.10	\$90.00
3/26/2024	Jesse Bair	Review AHAC's motion to quash Rule 2004 subpoena (.2);	0.20	\$180.00
3/26/2024	Jesse Bair	Supplemental analysis re California case law re discoverability of reserve information and correspond with debtor re same (.3);	0.30	\$270.00
3/26/2024	Timothy Burns	Review correspondence with Travelers and Lowenstein re document production, motion to compel, and meet and confer (.2);	0.20	\$224.00
3/26/2024	Timothy Burns	Begin preparations for next mediation session (.3);	0.30	\$336.00
3/26/2024	Jesse Bair	Correspond with N. Kuenzi re further analysis of Chubb and Westport privilege logs (.1);	0.10	\$90.00
3/27/2024	Timothy Burns	Review and respond to correspondence from B. Weisenberg to the Committee re mediation sessions (.1);	0.10	\$112.00
3/27/2024	Timothy Burns	Review correspondence from Travelers re Travelers' discovery obligations (.1);	0.10	\$112.00
3/27/2024	Jesse Bair	Participate in conference with T. Burns re case status, strategy, and ongoing insurance projects (.2);	0.20	\$180.00
3/27/2024	Timothy Burns	Participate in call with state court counsel re insurance and mediation strategy (.2);	0.20	\$224.00
3/27/2024	Timothy Burns	Participate in conference with J. Bair re case status, strategy, and ongoing insurance projects (.2);	0.20	\$224.00
3/27/2024	Timothy Burns	Review correspondence with the insurers, RCBO, and Committee counsel re Westport's motion for protective order (.2); further analysis in connection with same (.1); review additional emails re Westport's motion (.2);	0.50	\$560.00
3/27/2024	Timothy Burns	Continue preparations for next mediation session (.7);	0.70	\$784.00
3/27/2024	Brian Cawley	Continue drafting memorandum on insurer bad faith in multi-insurer situations (1.8);	1.80	\$990.00
3/27/2024	Timothy Burns	Review and revise draft stipulation to continue hearing on various motions (.1);	0.10	\$112.00
3/28/2024	Nathan Kuenzi	Analyze recently produced CNA documents (1.7);	1.70	\$935.00
3/28/2024	Timothy Burns	Review the Committee's letter to Westport re Westport's privilege log deficiencies (.2);	0.20	\$224.00



3/28/2024	Jesse Bair	Review the Committee's privilege log deficiency letter to Westport (.1);	0.10	\$90.00
3/28/2024	Timothy Burns	Review correspondence from Westport to G. Albert re April 10 status conference and draft stipulation regarding same (.1);	0.10	\$112.00
3/28/2024	Timothy Burns	Review correspondence with Travelers and Lowenstein re Travelers' document production (.2);	0.20	\$224.00
3/28/2024	Nathan Kuenzi	Analyze Westport privilege log, Chubb privilege log, and CNA privilege log, emphasizing Westport redactions of material on relevance grounds and compare against materials produced/redacted (2.3);	2.30	\$1,265.00
3/28/2024	Timothy Burns	Review multiple emails re April 26 Rule 2004 hearing and various insurers' participation in connection with same (.2);	0.20	\$224.00
3/28/2024	Brian Cawley	Finish drafting memorandum re various bad faith issues in connection with multi-insurer and multi-year claim situations (1.9);	1.90	\$1,045.00
3/29/2024	Jesse Bair	Review various correspondence with CNA, Travelers, Westport, and Lowenstein re Rule 2004 compliance, extensions, and upcoming hearing re same (.2);	0.20	\$180.00
3/29/2024	Timothy Burns	Review multiple emails between the insurers and Committee counsel re stipulation re hearing on subpoena discovery (.2);	0.20	\$224.00
3/29/2024	Timothy Burns	Review report of CNA document production (.2);	0.20	\$224.00
3/29/2024	Nathan Kuenzi	Draft email to J. Bair with assessment of supplemental CNA production (.1);	0.10	\$55.00
3/29/2024	Nathan Kuenzi	Analyze Westport privilege log and compare against materials produced/redacted (1.4);	1.40	\$770.00
3/29/2024	Timothy Burns	Participate in call with state court counsel re mediation strategy (.2);	0.20	\$224.00
3/29/2024	Alyssa Turgeon	Prepare Rule 2004 hearing preparation binder (2.9);	2.90	\$986.00
<b>Totals for Insurance Recovery Activities</b>			<b>144.40</b>	<b>\$111,584.00</b>

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<b>Total Hours and Fees</b>	<b>150.90</b>	<b>\$117,816.00</b>
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**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/14/2024	Wisconsin Certificate of Good Standing, J. Bair (pro hac vice application)	\$3.05
03/14/2024	Wisconsin Certificate of Good Standing, T. Burns (pro hac vice application)	\$3.05

03/17/2024	Hotel, T. Burns (3 nights)	\$897.00
03/17/2024	United Airlines, T. Burns (MSN-SFO, March 17-20, 2024)	\$764.35
03/17/2024	Travel meal, T. Burns	\$10.86
03/18/2024	Pro Hac Vice Application Fee, T. Burns (24-cv-00711)	\$328.00
03/18/2024	Pro Hac Vice Application Fee, J. Bair (24-cv-00709)	\$328.00
03/18/2024	Pro Hac Vice Application Fee, J. Bair (24-cv-00711)	\$328.00
03/18/2024	Pro Hac Vice Application Fee, T. Burns (24-cv-00709)	\$328.00
03/20/2024	Travel meal, T. Burns	\$35.69
03/20/2024	Uber, T. Burns (hotel to airport)	\$135.42
<b>Total Expenses</b>		<b>\$3,161.42</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	Paralegal	7.50	\$340.00	\$2,550.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	26.40	\$550.00	\$14,520.00
Jesse Bair	Partner	24.30	\$900.00	\$21,870.00
Karen Dempksi	Paralegal	0.70	\$340.00	\$238.00
Karin Jonch-Clausen	Associate	16.10	\$550.00	\$8,855.00
Nathan Kuenzi	Associate	26.30	\$550.00	\$14,465.00
Timothy Burns	Partner	49.30	\$1,120.00	\$55,216.00

**Total Due This Invoice: \$120,977.42**

# 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 :** 5/28/2024

**Bill # :** 01430

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/4/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case status and mediation issues (.6);	0.60	\$672.00
4/11/2024	Timothy Burns	Prepare for and participate in state court counsel meeting for insurance purposes re upcoming mediation session (1.0);	1.00	\$1,120.00
4/12/2024	Timothy Burns	Participate in Committee meeting for insurance purposes re upcoming mediation session (.7);	0.70	\$784.00
<b>Totals for Committee Meetings</b>			<b>2.30</b>	<b>\$2,576.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/29/2024	Jesse Bair	Correspondence with G. Albert and B. Horn-Edwards re Burns Bair monthly fee submission (.1);	0.10	\$90.00
4/30/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (1);	0.30	\$102.00
4/30/2024	Jesse Bair	Review Burns Bair invoice for privilege and confidential information (.9);	0.90	\$810.00
4/30/2024	Jesse Bair	Review and edit Burns Bair monthly fee submission (.1); review and respond to correspondence with B. Horn-Edwards and G. Albert re same (.2);	0.30	\$270.00
<b>Totals for Fee Applications</b>			<b>1.60</b>	<b>\$1,272.00</b>

## Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/18/2024	Jesse Bair	Participate in insurance case management hearing in the insurance district court action (.8); participate in post-hearing call with T. Burns re outcome of same (.1);	0.90	\$810.00
4/18/2024	Timothy Burns	Participate in insurance case management hearing with Judge Corley (.8); participate in post-hearing call with J. Bair re outcome of same (.1);	0.90	\$1,008.00
4/22/2024	Timothy Burns	Review April 10 hearing transcript re discovery status conference and draft note to file re same (.2);	0.20	\$224.00
4/26/2024	Jesse Bair	Participate in full-day omnibus Rule 2004 hearing, including conferences with Committee counsel and insurer counsel re hearing and other case issues (6.8);	6.80	\$6,120.00
<b>Totals for Hearings</b>			<b>8.80</b>	<b>\$8,162.00</b>

## Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/1/2024	Jesse Bair	Analyze the Debtor's mediation counter and conference with T. Burns re same and potential response (.2);	0.20	\$180.00
4/1/2024	Jesse Bair	Conference with T. Burns re Rule 2004 briefing and next-steps (.1);	0.10	\$90.00
4/1/2024	Timothy Burns	Review Debtor's mediation offer and conference with J. Bair re potential response to same (.2); prepare for call with the Debtor re mediation counter (.2); participate in conference with J. Bair re Rule 2004 insurance discovery strategy (.1);	0.50	\$560.00
4/1/2024	Timothy Burns	Participate in call with the debtor re mediation status and negotiations (1.7);	1.70	\$1,904.00
4/2/2024	Timothy Burns	Review and respond to correspondence from the mediator re the Debtor's counteroffer (.2); participate in conference with J. Bair re same (.1); prepare for call with Lowenstein re same (.2);	0.50	\$560.00
4/2/2024	Jesse Bair	Review correspondence from the mediator and T. Burns re the debtor's counteroffer (.2); participate in conference with T. Burns re same and potential response (.1);	0.30	\$270.00
4/2/2024	Timothy Burns	Participate in call with Lowenstein re the Debtor's mediation counteroffer and strategy regarding same (1.0);	1.00	\$1,120.00
4/3/2024	Jesse Bair	Review N. Kuenzi research re California statutory reserve requirements and correspond with C. Restel re same (.2);	0.20	\$180.00

4/3/2024	Timothy Burns	Participate in conference J. Bair re Debtor's counter and overall Committee mediation strategy (.1);	0.10	\$112.00
4/3/2024	Nathan Kuenzi	Analyze statutes and regulations pertaining to insurance reserve recordkeeping requirements and draft email memo for J. Bair re same (1.8);	1.80	\$990.00
4/3/2024	Timothy Burns	Review B. Weisenberg correspondence with the Committee re mediation issues (.1);	0.10	\$112.00
4/3/2024	Jesse Bair	Participate in conference with T. Burns re mediation strategy and next-steps (.1);	0.10	\$90.00
4/4/2024	Timothy Burns	Participate in calls with state court counsel and Lowenstein re insurance adversary proceeding scope and scheduling issues (.5);	0.50	\$560.00
4/4/2024	Timothy Burns	Review and respond to debtor correspondence re insurer proof of claims discovery (.1);	0.10	\$112.00
4/4/2024	Timothy Burns	Review order approving stipulation re April 17 hearing re insurer Rule 2004 issues (.1);	0.10	\$112.00
4/4/2024	Jesse Bair	Provide additional instructions to N. Kuenzi re analysis needed of the insurers' previous proposed insurance case schedule (.1);	0.10	\$90.00
4/4/2024	Timothy Burns	Review N. Kuenzi research memo re California reserve requirements (.2);	0.20	\$224.00
4/4/2024	Nathan Kuenzi	Participate in conference with T. Burns regarding project re insurance case scheduling issues in connection with draft case management statement (.2);	0.20	\$110.00
4/4/2024	Timothy Burns	Review correspondence with the debtor re case management and scheduling issues in the insurance adversary proceeding (.1); provide instructions to N. Kuenzi re assignment re same (.2); participate in conference with J. Bair re same (.2);	0.50	\$560.00
4/4/2024	Jesse Bair	Participate in conference with T. Burns re proposed insurance case schedule, upcoming case management conference statement, and particular insurer coverage defenses (.2);	0.20	\$180.00
4/4/2024	Nathan Kuenzi	Analyze prior insurance case schedules proposed by the debtor and insurers to inform Committee position re insurance case schedule for upcoming case management conference (.5);	0.50	\$275.00
4/5/2024	Timothy Burns	Review correspondence with Lowenstein and state court counsel re mediation counter and potential response (.2);	0.20	\$224.00
4/5/2024	Timothy Burns	Draft internal memo re proposed insurance adversary proceeding scheduling plan (.5);	0.50	\$560.00

4/5/2024	Timothy Burns	Prepare for meet and confer with the debtor re insurance case scheduling issues (.1); participate in meet and confer with the debtor and Lowenstein re potential case schedule re the insurance adversary proceeding (.4);	0.50	\$560.00
4/5/2024	Jesse Bair	Review correspondence with Lowenstein and state court counsel re debtor mediation counter and potential response to same (.1);	0.10	\$90.00
4/5/2024	Timothy Burns	Participate in conference with Lowenstein re strategy re insurance case schedule in the adversary proceeding and upcoming meet and confer with the debtor re same (.5);	0.50	\$560.00
4/5/2024	Jesse Bair	Review debtor's proposed insurance case schedule and related correspondence with T. Burns re same (.1); participate in insurance adversary proceeding meet and confer with the Debtor re same (.4);	0.50	\$450.00
4/6/2024	Timothy Burns	Review and prepare response to Debtor correspondence to the insurers re proposed case management schedule (.4); correspond with Committee professionals re same (.1);	0.50	\$560.00
4/6/2024	Timothy Burns	Review and revise draft insurance case management order prepared by the Debtor (1.8);	1.80	\$2,016.00
4/6/2024	Jesse Bair	Brief review re the Debtor's draft case management statement in the insurance adversary proceeding (.1); review and respond to correspondence with Lowenstein and T. Burns re same (.1);	0.20	\$180.00
4/6/2024	Timothy Burns	Review correspondence with Westport and Lowenstein re meet and confer re Westport's privilege log (.1);	0.10	\$112.00
4/7/2024	Timothy Burns	Review and respond to correspondence with Lowenstein and J. Bair re insurance case management statement proposed revisions (.2);	0.20	\$224.00
4/7/2024	Jesse Bair	Review and respond to various correspondence with Lowenstein and T. Burns re draft case management statement and potential test case strategy moving forward (.2);	0.20	\$180.00
4/7/2024	Jesse Bair	Review T. Burns' suggested edits to the draft insurance case management statement (.2);	0.20	\$180.00
4/8/2024	Jesse Bair	Review and edit the Committee's objection to Westport's motion for a protective order (.7);	0.70	\$630.00

4/9/2024	Jesse Bair	Review and respond to correspondence with T. Burns and Lowenstein re potential test case strategy and edits to the draft insurance case management statement (.1);	0.10	\$90.00
4/10/2024	Jesse Bair	Review Westport's recent letter re its privilege log (.1); review N. Kuenzi analysis re overview of Westport's privilege and confidentiality redactions and correspond with C. Restel re same in response to Westport's letter (.2);	0.30	\$270.00
4/10/2024	Timothy Burns	Review correspondence with Lowenstein and J. Bair re the insurers' proposed edits to the insurance case management statement (.2);	0.20	\$224.00
4/10/2024	Timothy Burns	Review correspondence from Westport re privilege log dispute (.1);	0.10	\$112.00
4/10/2024	Jesse Bair	Review the insurers' proposed edits to the draft case management statement (.3); correspondence with Lowenstein, the debtor and the insurers re same (.1);	0.40	\$360.00
4/10/2024	Nathan Kuenzi	Analyze Westport production and privilege log in response to questions raised regarding withholding of documents and draft email memo in response to same (1.6);	1.60	\$880.00
4/10/2024	Timothy Burns	Review correspondence with Lowenstein and Burns Bair re Westport discovery dispute and privilege log issues (.2);	0.20	\$224.00
4/10/2024	Jesse Bair	Participate in conference with T. Burns re insurance mediation status and strategy (.2);	0.20	\$180.00
4/10/2024	Timothy Burns	Participate in conference with J. Bair re mediation developments and strategy (.2);	0.20	\$224.00
4/11/2024	Jesse Bair	Review and edit revised version of the insurance case management statement (.2); review correspondence with the debtor, insurers, and Committee professionals re same and additional proposed edits (.2); review further revised version of case management statement (.2); participate in conference with T. Burns re Committee mediation strategy and upcoming session (.2);	0.80	\$720.00
4/11/2024	Timothy Burns	Participate in call with B. Weisenberg and J. Prol re mediation strategy (.4); met with J. Bair re same (.2);	0.60	\$672.00
4/11/2024	Timothy Burns	Prepare for upcoming mediation session (.2);	0.20	\$224.00

4/11/2024	Timothy Burns	Review and respond to correspondence with the debtor, Committee professionals, and insurers re finalization of case management report for insurance adversary proceeding (.2);	0.20	\$224.00
4/11/2024	Timothy Burns	Review and respond to J. Prol correspondence re mediator Gallagher (.1);	0.10	\$112.00
4/11/2024	Timothy Burns	Review and revise updated iteration of the draft insurance case management statement (1.3);	1.30	\$1,456.00
4/12/2024	Timothy Burns	Review and respond to insurance adversary and mediation-related email from Foley (.2);	0.20	\$224.00
4/12/2024	Timothy Burns	Participate in call with state court counsel re mediation strategy (.3); additional insurance preparations in advance of upcoming mediation session (.2);	0.50	\$560.00
4/14/2024	Timothy Burns	Review district court's acknowledgement of LMI's Rule 2004 appeal (.1); review information re district judge assigned to appeal (.1);	0.20	\$224.00
4/14/2024	Timothy Burns	Review debtor correspondence re various insurance adversary proceeding issues and draft comprehensive response to same (.8);	0.80	\$896.00
4/14/2024	Timothy Burns	Review correspondence with B. Weisenberg and mediator Sontchi re upcoming mediation session (.2);	0.20	\$224.00
4/15/2024	Karin Jonch-Clausen	Research California case law and statutes re an insurer's duties to insolvent policyholder and draft memo summarizing findings (2.3);	2.30	\$1,265.00
4/15/2024	Timothy Burns	Participate in pre-mediation meeting with Committee professionals re case developments and mediation session strategy (.7);	0.70	\$784.00
4/15/2024	Jesse Bair	Correspond with T. Burns re status conference statement issues in connection with upcoming insurance case management conference (.1);	0.10	\$90.00
4/15/2024	Timothy Burns	Review Debtor's response to American Home's motion to withdraw the reference (.1);	0.10	\$112.00
4/15/2024	Jesse Bair	Correspond with K. Dempski, G. Albert, and T. Burns re upcoming insurance status conference hearing (.1);	0.10	\$90.00
4/15/2024	Timothy Burns	Participate in post-mediation meetings with Committee members, Committee professionals, and state court counsel re outcome of initial session and next-steps (1.2);	1.20	\$1,344.00



4/15/2024	Timothy Burns	Participate in full-day mediation session (8.0);	8.00	\$8,960.00
4/15/2024	Alyssa Turgeon	Organize and index debtor historical insurance policy materials (1.0);	1.00	\$340.00
4/15/2024	Nathan Kuenzi	Review debtor production materials for Employers Reinsurance policies and analyze particular coverage details for T. Burns (.3);	0.30	\$165.00
4/16/2024	Timothy Burns	Participate in day 2 of mediation session (7.8);	7.80	\$8,736.00
4/17/2024	Timothy Burns	Participate in call with J. Bair re mediation developments and outcome of recent session (.1);	0.10	\$112.00
4/17/2024	Jesse Bair	Provide instructions to N. Kuenzi re insurance research project re potential test case strategy (.2);	0.20	\$180.00
4/17/2024	Nathan Kuenzi	Participate in conference with J. Bair re research project re potential test case strategy and insurer arguments re cooperation clause issues in connection with same (.2);	0.20	\$110.00
4/17/2024	Jesse Bair	Review order adjourning certain Rule 2004 hearing and correspond with C. Restel re upcoming hearing re same (.1);	0.10	\$90.00
4/17/2024	Timothy Burns	Begin preparing for case management hearing in the district court insurance action (2.3);	2.30	\$2,576.00
4/17/2024	Nathan Kuenzi	Begin researching case law re potential insurer arguments re cooperation clause issues in connection with potential test case strategy (1.5);	1.50	\$825.00
4/17/2024	Jesse Bair	Review and respond to correspondence with T. Burns and N. Kuenzi re Committee insurance intervention issues (.1);	0.10	\$90.00
4/17/2024	Jesse Bair	Participate in conference with T. Burns re mediation session outcome (.1);	0.10	\$90.00
4/17/2024	Nathan Kuenzi	Review and respond to correspondence with T. Burns and J. Bair re issues re scope of the Committee's intervention in the insurance adversary proceeding (.2);	0.20	\$110.00
4/18/2024	Timothy Burns	Review the Committee's draft reply brief in support of its motion to enforce Rule 2004 discovery order (.2);	0.20	\$224.00
4/18/2024	Jesse Bair	Prepare for insurance case management conference, including review of final version of the parties' case management statement (.4);	0.40	\$360.00
4/18/2024	Timothy Burns	Continue preparing for case management hearing in the insurance district court action, including review of various case filings and insurance materials (3.2);	3.20	\$3,584.00

4/18/2024	Jesse Bair	Review and edit the Committee's reply brief in support of its motion to enforce Rule 2004 order (.4);	0.40	\$360.00
4/18/2024	Jesse Bair	Draft email memo to the Committee re insurance case updates (.6);	0.60	\$540.00
4/18/2024	Timothy Burns	Review and respond to correspondence with state court counsel re test case issues (.1);	0.10	\$112.00
4/18/2024	Nathan Kuenzi	Continue researching case law re potential insurer arguments re cooperation clause issues in connection with potential test case strategy (3.0);	3.00	\$1,650.00
4/19/2024	Nathan Kuenzi	Continue researching case law re potential insurer arguments re cooperation clause issues in connection with potential test case strategy (2.8);	2.80	\$1,540.00
4/19/2024	Jesse Bair	Participate in conference with T. Burns re strategy for upcoming insurance Rule 2004 hearing (.2);	0.20	\$180.00
4/19/2024	Timothy Burns	Participate in call with J. Bair re strategy for upcoming insurance Rule 2004 hearing (.2);	0.20	\$224.00
4/20/2024	Timothy Burns	Review Pretrial Order No. 1 in the district court insurance action (.1);	0.10	\$112.00
4/21/2024	Jesse Bair	Review Travelers correspondence re supplemental document production and correspond with BB team re review of same (.1);	0.10	\$90.00
4/22/2024	Jesse Bair	Participate in conference with T. Burns and N. Kuenzi re Rule 2004 hearing preparations and strategy (.3); correspond with Lowenstein re same (.1);	0.40	\$360.00
4/22/2024	Timothy Burns	Review Westport's Reply in support of Motion for Protective Order and draft note to file re same (.4); email to J. Bair re arguments and counterarguments in same for hearing prep (.1);	0.50	\$560.00
4/22/2024	Timothy Burns	Review correspondence from Travelers re Travelers' initial disclosures (.1);	0.10	\$112.00
4/22/2024	Nathan Kuenzi	Participate in conference with T. Burns and J. Bair re Rule 2004 hearing preparations and related projects in connection with same (.3);	0.30	\$165.00
4/22/2024	Jesse Bair	Review the district court's initial pre-trial order number 1 (.1);	0.10	\$90.00
4/22/2024	Timothy Burns	Review final version of the Committee's Reply in support of its Motion to Enforce Rule 2004 Subpoenas and draft note to file re same (.2);	0.20	\$224.00
4/22/2024	Jesse Bair	Review correspondence with the debtor and insurers re initial disclosure meet and confer (.1);	0.10	\$90.00

4/22/2024	Nathan Kuenzi	Review and analyze previously served insurer initial disclosures (.8);	0.80	\$440.00
4/22/2024	Timothy Burns	Correspond with J. Bair, N. Kuenzi, and K. Dempski re upcoming hearing re insurer Rule 2004 motions to compel and for protective order (.2); review correspondence with the court re hearing re same (.1);	0.30	\$336.00
4/22/2024	Nathan Kuenzi	Identify key materials needed for preparation for upcoming omnibus hearing re insurance Rule 2004 motions (1.1);	1.10	\$605.00
4/22/2024	Timothy Burns	Review LMI's Reply in Support of Motion for Stay Pending Appeal (.2); review LMI's Reply in Support of Motion for Protective Order (.2);	0.40	\$448.00
4/23/2024	Nathan Kuenzi	Begin drafting memorandum summarizing research results re potential insurer arguments re cooperation clause issues in connection with potential test case strategy (3.5);	3.50	\$1,925.00
4/23/2024	Nathan Kuenzi	Analyze Travelers 1975-78 policy information and update coverage chart (.3);	0.30	\$165.00
4/23/2024	Jesse Bair	Correspond with T. Burns and N. Kuenzi re Travelers coverage issues (.1);	0.10	\$90.00
4/23/2024	Nathan Kuenzi	Continue detailed research re potential insurer arguments re cooperation clause issues in connection with potential test case strategy (2.8);	2.80	\$1,540.00
4/23/2024	Nathan Kuenzi	Continue identifying key materials needed for preparation for upcoming omnibus hearing re insurance Rule 2004 motions (.9);	0.90	\$495.00
4/23/2024	Jesse Bair	Begin preparations for omnibus Rule 2004 hearing (.2);	0.20	\$180.00
4/23/2024	Jesse Bair	Correspond with Lowenstein re outcome of April 23 hearing in connection with upcoming omnibus hearing re various insurance Rule 2004 motions (.1);	0.10	\$90.00
4/23/2024	Alyssa Turgeon	Prepare hearing preparation binder for J. Bair for upcoming omnibus hearing on various insurance Rule 2004 motions (.9);	0.90	\$306.00
4/23/2024	Timothy Burns	Review and respond to correspondence with state court counsel re insurance mediation strategy (.2); review debtor coverage chart in connection with same (.2); correspond with J. Bair and N. Kuenzi re potential edits to coverage chart (.1);	0.50	\$560.00

4/24/2024	Jesse Bair	Prepare for omnibus Rule 2004 motion to enforce / quash hearing by reviewing the Committee's motion to enforce (.2); LMI's motion to quash and accompanying exhibits (.3); American Home's motion to quash (.2); LMI's motion for a protective order and accompanying documents (.4); and the Committee's original Rule 2004 briefing (.6);	1.70	\$1,530.00
4/24/2024	Nathan Kuenzi	Finish drafting memorandum summarizing research re potential insurer arguments re cooperation clause issues in connection with potential test case strategy (3.8);	3.80	\$2,090.00
4/24/2024	Jesse Bair	Review C. Restel correspondence re outcome of April 23 status conference in connection with Rule 2004 arguments (.1);	0.10	\$90.00
4/24/2024	Timothy Burns	Participate in conference with J. Bair and N. Kuenzi re ongoing case insurance projects in connection with mediation and upcoming Rule 2004 hearing (.2);	0.20	\$224.00
4/24/2024	Jesse Bair	Begin drafting argument outline in connection with upcoming omnibus Rule 2004 motion to enforce / quash hearing (.8);	0.80	\$720.00
4/24/2024	Jesse Bair	Preliminary review re Travelers privilege log and correspond with N. Kuenzi re further review needed re same (.1);	0.10	\$90.00
4/24/2024	Timothy Burns	Review and respond to correspondence with mediator Sontchi and Lowenstein re mediation issues (.1);	0.10	\$112.00
4/24/2024	Nathan Kuenzi	Revise and edit summary chart of insurer rule 2004 document productions to date (.7);	0.70	\$385.00
4/24/2024	Timothy Burns	Participate in call with state court counsel re mediation and insurance strategy (.2);	0.20	\$224.00
4/24/2024	Nathan Kuenzi	Review Ninth Circuit case law on privilege and bad faith in connection with preparations for omnibus Rule 2004 insurance hearing (.4);	0.40	\$220.00
4/24/2024	Timothy Burns	Participate in call with Lowenstein re mediation updates and upcoming Rule 2004 hearing (.1);	0.10	\$112.00
4/24/2024	Timothy Burns	Brief review of Travelers' privilege log and related correspondence between J. Bair and N. Kuenzi (.1);	0.10	\$112.00
4/24/2024	Nathan Kuenzi	Finish detailed research re potential insurer arguments re cooperation clause issues in connection with potential test case strategy (1.5);	1.50	\$825.00

4/24/2024	Nathan Kuenzi	Participate in conference with J. Bair and T. Burns re ongoing case insurance projects in connection with mediation and upcoming Rule 2004 hearing (.2);	0.20	\$110.00
4/24/2024	Jesse Bair	Continue preparing for omnibus Rule 2004 motion to enforce / quash hearing by reviewing American Home's opposition to the Committee's motion to enforce (.2); the Committee's opposition to LMI's motion to quash (.1); and the Committee's opposition to American Home's motion to quash (.1); participate in conference with T. Burns and N. Kuenzi re ongoing case insurance projects in connection with mediation and upcoming Rule 2004 hearing (.2);	0.60	\$540.00
4/24/2024	Jesse Bair	Review Westport's motion for a protective order and voluminous exhibits filed with same in preparation for omnibus Rule 2004 motion to enforce / quash hearing (1.1);	1.10	\$990.00
4/25/2024	Karin Jonch-Clausen	Review (first level) and log supplemental Travelers document production (4.8);	4.80	\$2,640.00
4/25/2024	Jesse Bair	Participate in conference with T. Burns re strategy for Rule 2004 omnibus hearing (.2); correspond with M. Kaplan re same (.1);	0.30	\$270.00
4/25/2024	Jesse Bair	Continue preparing for omnibus Rule 2004 motion to enforce / quash hearing by reviewing LMI's reply in support of its motion for a protective order (.2); American Home's reply in support of its motion to quash (.3); the Committee's reply in support of its motion to enforce (.1); Westport's reply in support of its motion for a protective order (.5); and Westport's opposition to the Committee's motion to enforce (.2);	1.30	\$1,170.00
4/25/2024	Jesse Bair	Review transcript of April 23 hearing re Rule 2004 evidentiary issues in connection with upcoming omnibus hearing on various insurance Rule 2004 motions (.5);	0.50	\$450.00
4/25/2024	Nathan Kuenzi	Review (first level) and log supplemental Travelers document production (3.8);	3.80	\$2,090.00
4/25/2024	Jesse Bair	Review updated summary of the carriers' Rule 2004 production in connection with upcoming Rule 2004 omnibus hearing (.1);	0.10	\$90.00
4/25/2024	Jesse Bair	Continue drafting oral argument outline for omnibus Rule 2004 hearing and preparing for same (3.2);	3.20	\$2,880.00
4/25/2024	Jesse Bair	Review K. Jonch-Clausen email memo re privilege research in connection with claim files and reserve information (.1); review T. Burns email memos re potential arguments for omnibus Rule 2004 hearing (.2);	0.30	\$270.00

4/25/2024	Jesse Bair	Review the Committee's opposition to Westport's motion for a protective order and accompanying exhibits in preparation for omnibus Rule 2004 hearing (.4);	0.40	\$360.00
4/25/2024	Jesse Bair	Review case law cited in the parties' briefing in preparation for upcoming omnibus Rule 2004 hearing (1.4);	1.40	\$1,260.00
4/25/2024	Timothy Burns	Participate in conference with J. Bair re strategy for Rule 2004 omnibus hearing (.2);	0.20	\$224.00
4/26/2024	Nathan Kuenzi	Locate and submit LMI ROR letters for J. Bair in support of hearing arguments (.1);	0.10	\$55.00
4/26/2024	Karin Jonch-Clausen	Continue reviewing (first level) and logging supplemental Travelers document production (2.4);	2.40	\$1,320.00
4/26/2024	Jesse Bair	Continue preparing for omnibus Rule 2004 hearing (1.0);	1.00	\$900.00
4/26/2024	Jesse Bair	Review and respond to correspondence with T. Burns re outcome of omnibus Rule 2004 hearing (.1);	0.10	\$90.00
4/26/2024	Timothy Burns	Correspond with J. Bair re omnibus Rule 2004 hearing outcome (.1);	0.10	\$112.00
4/26/2024	Nathan Kuenzi	Continue reviewing (first level) and logging supplemental Travelers document production (.5);	0.50	\$275.00
4/26/2024	Jesse Bair	Participate in pre-hearing meeting with Committee counsel re Rule 2004 omnibus hearing strategy (.6);	0.60	\$540.00
4/26/2024	Timothy Burns	Participate in call with mediator and Lowenstein re case mediation issues (.5);	0.50	\$560.00
4/28/2024	Jesse Bair	Review debtor's report re Rule 26(f) meet and confer in the insurance district court action (.1);	0.10	\$90.00
4/29/2024	Timothy Burns	Met with J. Bair re Rule 2004 hearing outcome and insurance strategy for upcoming mediation sessions (.2); begin preparing for next round of mediation sessions (.2);	0.40	\$448.00
4/29/2024	Jesse Bair	Participate in conference with T. Burns re insurance case strategy and related insurance projects (.1);	0.10	\$90.00
4/29/2024	Jesse Bair	Participate in additional conference with T. Burns re omnibus Rule 2004 hearing outcome and strategy for next mediation session (.2);	0.20	\$180.00
4/29/2024	Nathan Kuenzi	Participate in BB team conference re case updates and ongoing insurance projects (.1);	0.10	\$55.00
4/29/2024	Jesse Bair	Participate in BB team conference re case developments and potential next-steps and assignments (.1);	0.10	\$90.00

4/29/2024	Timothy Burns	Participate in BB team meeting re case developments and related assignments (.1);	0.10	\$112.00
4/29/2024	Karin Jonch-Clausen	Continue reviewing (first level) and logging supplemental Travelers document production (1.2);	1.20	\$660.00
4/29/2024	Timothy Burns	Participate in additional conference with J. Bair re insurance case strategy and related insurance projects (.1); met with N. Kuenzi re same and insurance project instructions (.1);	0.20	\$224.00
4/29/2024	Nathan Kuenzi	Continue reviewing (first level) and logging supplemental Travelers document production (.6);	0.60	\$330.00
4/29/2024	Nathan Kuenzi	Participate in additional conference with T. Burns re pending issues in case and additional related insurance projects (.1);	0.10	\$55.00
4/30/2024	Nathan Kuenzi	Review (first level) and log supplemental CNA document production (2.0);	2.00	\$1,100.00
4/30/2024	Karen Dempski	Download/upload recent CNA document production (.2); correspond with N. Kuenzi re same (.1);	0.30	\$102.00
4/30/2024	Jesse Bair	Review correspondence with LMI re appeal of 2004 order and joint appendix re same (.1);	0.10	\$90.00
4/30/2024	Jesse Bair	Review correspondence with the debtor and Chubb re Chubb's motion to seal in the insurance district court action and draft stipulation re same (.1);	0.10	\$90.00
4/30/2024	Karin Jonch-Clausen	Continue reviewing (first level) and logging supplemental Travelers document production (1.4);	1.40	\$770.00
<b>Totals for Insurance Recovery Activities</b>			<b>115.30</b>	<b>\$95,259.00</b>

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<b>Total Hours and Fees</b>	<b>128.00</b>	<b>\$107,269.00</b>
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### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/04/2024	CloudNine, processing for conversion from .tiff files to .pdf documents (March 2024)	\$275.00
04/14/2024	Delta Airlines, T. Burns (April 14-17)	\$1,774.15
04/14/2024	Uber, T. Burns (airport to hotel)	\$133.20
04/14/2024	Hotel, T. Burns (3 nights)	\$844.55
04/14/2024	Travel meal, T. Burns	\$9.61
04/17/2024	United Airlines Inflight Wi-Fi, T. Burns	\$10.00
04/17/2024	Car service, T. Burns (hotel to airport)	\$130.90
04/25/2024	Travel meal, J. Bair	\$44.38
04/25/2024	Hotel, J. Bair (1 night)	\$397.63

04/25/2024	Taxi, J. Bair (airport to hotel)	\$112.80
04/25/2024	Delta Airlines, J. Bair (MSN-SFO)	\$1,678.20
04/26/2024	Uber, J. Bair (hotel to airport)	\$103.72
04/26/2024	Travel meal, J. Bair	\$12.21
04/26/2024	Travel meal, J. Bair	\$9.75
04/27/2024	Travel meal, J. Bair	\$18.22
04/27/2024	Airport parking, J. Bair	\$20.00
<b>Total Expenses</b>		<b>\$5,574.32</b>

**Timekeeper Summary**

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	Paralegal	1.90	\$340.00	\$646.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Jesse Bair	Partner	31.60	\$900.00	\$28,440.00
Karen Dempski	Paralegal	0.30	\$340.00	\$102.00
Karin Jonch-Clausen	Associate	12.10	\$550.00	\$6,655.00
Nathan Kuenzi	Associate	35.60	\$550.00	\$19,580.00
Timothy Burns	Partner	46.20	\$1,120.00	\$51,744.00

**Total Due This Invoice: \$112,843.32**