

FOLEY & LARDNER LLP

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*Counsel for the Debtor
and Debtor in Possession*

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

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

**COVER SHEET TO THIRD INTERIM FEE
APPLICATION OF FOLEY & LARDNER
LLP, AS GENERAL BANKRUPTCY
COUNSEL TO THE DEBTOR, FOR
ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD OF
JANUARY 1, 2024, THROUGH APRIL 30,
2024**

Judge: Hon. William J. Lafferty

Date: July 24, 2024

Time: 10:30 a.m.

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

Objection Deadline: July 5, 2024¹

¹ The objection deadline is set pursuant to the Court’s order approving interim compensation procedures [Docket No. 170]. In light of the July 4 holiday, Foley is contacting and will work with the Fee Examiner and US Trustee to address any issues with the objection deadline or hearing date.



Name of Applicant:	Foley & Lardner LLP
Name of Client:	The Roman Catholic Bishop of Oakland
Time Period covered by this application:	January 1, 2024 – April 30, 2024
Total compensation sought this period: ²	\$2,010,082.50 ³
Total expenses sought this period: ⁴	\$28,809.16
Petition date:	May 8, 2023
Retention date:	Effective as of May 8, 2023
Date of order approving employment:	June 15, 2023 [Docket No. 145]
Total fees approved by interim order to date:	\$4,769,013.00 ⁵
Total expenses approved by interim order to date:	\$55,053.07
Total allowed fees paid to date:	\$4,769,013.00
Total allowed expenses paid to date:	\$55,053.07
Blended rate in this application for all attorneys:	\$789.40 ⁶
Blended rate in this application for all timekeepers:	\$742.91 ⁷
Fees sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$1,609,683.60
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$28,809.16
Number of professionals included in this application:	34
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 billing fewer than 15 hours to the case during this period:	13 ⁸

² Foley & Lardner LLP has agreed to not bill the Debtor for the time it takes its attorneys to travel to or from the Bay Area and such amounts are not included in this Interim Application.

³ This amount reflects a write-off of \$2,022.00 for four timekeepers who billed under 15 hours during the Interim Fee Period. Foley includes in this Interim Application fees for certain other timekeepers who billed more than 15 hours during the Interim Fee Period for the reasons described, *infra*.

⁴ Foley & Lardner LLP has agreed to not bill the Debtor for the expenses for its attorneys to travel to or from the Bay Area (*e.g.*, airfare and ride share charges) in connection with this Bankruptcy Case, and such amounts are not included in this Interim Application. For the Interim Fee Period, the amount paid by Foley and not sought for reimbursement is \$49,260.05.

⁵ This amount includes the fee reductions agreed to between Foley and the Office of the United States Trustee of \$75,000.00 for Foley's First Interim Fee Application, and \$28,000.00 for Foley's Second Interim Fee Application.

⁶ This amount includes timekeepers whose *de minimis* time has been written off in this Interim Application.

⁷ This amount includes timekeepers whose *de minimis* time has been written off in this Interim Application.

⁸ As noted above, Foley & Lardner LLP is not requesting payment of fees related to four timekeepers due to *de* COVER SHEET TO FOLEY & LARDNER THIRD INTERIM FEE APPLICATION

Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this application using the rates originally disclosed in the retention application:	No
Interim or Final:	Interim

SUMMARY OF MONTHLY FEE STATEMENTS FOR THE INTERIM FEE PERIOD

Date Filed	Period Covered	80% of Fees Requested	Total Fees Incurred	Expenses Requested	Fees Approved	Expenses Approved	Amount Received
02/29/24 (Dkt. No. 912)	01/01/24 – 01/31/24	\$480,318.80	\$600,398.50	\$8,686.40	\$480,318.40	\$8,686.40	\$489,005.20
03/29/24 (Dkt. No. 1016)	02/01/24 – 02/29/24	\$445,504.40	\$556,880.50	\$5,472.50	\$445,504.40	\$5,472.50	\$450,976.90
04/30/24 (Dkt. No. 1104)	03/01/24 – 03/31/24	\$328,022.00	\$410,027.50	\$5,415.65	\$328,022.00	\$5,135.49	\$333,437.65
05/30/24 (Dkt. No. 1158)	04/01/24 – 04/30/24	\$355,838.40	\$444,798.00	\$9,234.61	\$355,838.40	\$9,234.61	\$365,073.01
Total		\$1,609,683.60	\$2,012,104.50	\$28,809.16	\$1,609,683.60	\$28,809.16	\$1,638,492.76

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Application and Not Yet Paid: **\$400,398.90⁹**

minimis amounts billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$2,022.00 related to said timekeepers. However, Foley requests payment of fees for the remaining timekeepers who billed fewer than 15 hours during this period, because their expertise is unique and necessary for certain discrete issues in the case (e.g., trusts and estates, real estate, corporate governance, insurance, and bankruptcy matters), including several timekeepers who have spent significant time on this case since its filing in May 2023.

⁹ This amount reflects the write-off of \$2,022.00 for four timekeepers who billed under 15 hours during the Interim Fee Period, which was not accounted for in the Monthly Fee Statements.

COVER SHEET TO FOLEY & LARDNER THIRD INTERIM FEE APPLICATION

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16 *Counsel for the Debtor*
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19 **NORTHERN DISTRICT OF CALIFORNIA**
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22 THE ROMAN CATHOLIC BISHOP OF
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I. INTRODUCTION

Foley & Lardner LLP (“Foley” or the “Firm”), as general bankruptcy counsel to The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor” or “RCBO”),¹¹ respectfully submits this third interim application for allowance of compensation and reimbursement of actual and necessary expenses (the “Interim Application”) for services performed as general bankruptcy counsel to the Debtor for the period of January 1, 2024 through April 30, 2024 (the “Interim Fee Period”) in the above-captioned Chapter 11 bankruptcy case (the “Bankruptcy Case”).

Foley seeks interim approval of its fees incurred and reimbursement of expenses during the Interim Fee Period totaling **\$2,038,891.66**. This sum represents compensation in the amount of **\$2,010,082.50** for the total of 2,708.40 hours spent by Foley’s professionals for the legal services provided to the Debtor in this matter,¹² and reimbursement for expenses incurred in the amount of **\$28,809.16**. Foley has received a total of **\$1,638,492.76** in payments for services during the Interim Fee Period, based on its monthly fee statements pursuant to the interim compensation procedures approved by the Court, and therefore now requests the balance of **\$400,398.90** be paid to the Firm.

This Interim Application is based upon the contents hereof, together with the exhibits, the declaration of Ann Marie Uetz filed concurrently herewith, the pleadings, papers, and records on file in this case, and any evidence or argument that the Court may entertain at the time of the hearing on the Interim Application. This Interim Application is submitted considering the United States Department of Justice’s *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the “Large Case Guidelines”). Summary charts complying with the Large Case Guidelines and detailing the amount of

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¹¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Order.

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¹² Foley & Lardner LLP is not requesting payment of fees related to four timekeepers due to *de minimis* amounts billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$2,022.00 related to said timekeepers, and the amounts set forth here reflect this write-off. However, Foley requests payment of fees for the remaining timekeepers who billed fewer than 15 hours during this period, because their expertise is unique and necessary for certain discrete issues in the case (*e.g.*, trusts and estates, real estate, corporate governance, insurance, and bankruptcy matters), including several timekeepers who have spent significant time on this case since its filing in May 2023.

1 fees charged and hours worked by each of the Firm’s professionals and paraprofessionals during the
2 Interim Fee Period are attached hereto as **Exhibit B** through **Exhibit F**.

3 **II. BACKGROUND**

4 **A. General Background**

5 On May 8, 2023 (the “Petition Date”), the Debtor filed its voluntary Chapter 11 petition
6 commencing the Bankruptcy Case. The Debtor continues to operate its ministry and manage its assets and
7 properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee
8 has been appointed in this Bankruptcy Case.

9 On May 23, 2023, the Office of the United States Trustee (the “US Trustee”) filed its notice of
10 appointment of an Official Committee of Unsecured Creditors (the “Committee”) [Docket No. 58].

11 The Debtor is a corporation sole organized under the laws of the State of California. The Debtor
12 conducts its civil affairs under the laws of the State of California and the United States of America and in
13 accordance with the Code of Canon Law, the ecclesiastical law of the Roman Catholic Church. Additional
14 information regarding the Debtor, its mission, ministries, and operations, and the events and circumstances
15 preceding the Petition Date, is set forth in the *Declaration of Charles Moore, Managing Director of*
16 *Alvarez & Marsal North America, LLC, Proposed Restructuring Advisor to the Roman Catholic Bishop*
17 *of Oakland, in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 19], which is
18 incorporated herein by reference.

19 **B. Employment of Foley**

20 On May 23, 2023, the Debtor filed the *Debtor’s Application to Employ Foley & Lardner LLP as*
21 *General Bankruptcy Counsel Pursuant to 11 U.S.C. §§ 327(a), 330, 331 & 1107, and Rules 2014 and*
22 *2016 of the Federal Rules of Bankruptcy Procedure* [Docket. No. 60] (the “Retention Application”). The
23 Court approved the Retention Application on June 15, 2023, entering the *Order Approving Debtor’s*
24 *Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§*
25 *327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Docket
26 No. 145] (the “Foley Retention Order”). A copy of the Foley Retention Order is attached hereto as

27 **Exhibit A.**

1 **C. Summary of Case Status and Developments**

2 1. Initial Progress in the Case

3 During the initial months of this Bankruptcy Case, the Debtor focused on a smooth transition into
4 Chapter 11 and obtaining essential first day and other relief. On the Petition Date, the Debtor filed first
5 day motions seeking essential relief in this case (collectively, the “First Day Motions”). The Debtor
6 worked constructively with the US Trustee, and, after its appointment, the Committee to resolve disputes
7 and issues regarding the First Day Motions. As a result of these efforts, the Debtor was able to obtain
8 consensual final orders on all but one of the First Day Motions, and substantially narrow the issues prior
9 to obtaining a Court ruling on the one First Day Motion not consensually resolved.

10 The Debtor timely filed, and later amended, its Schedules of Assets and Liabilities (as amended,
11 the “Schedules”) and Statement of Financial Affairs on May 22, 2023 [Docket Nos. 82, 137 and 169].

12 The Debtor also obtained approval for employment of its bankruptcy professionals and for
13 employment of ordinary course professionals, complied with the US Trustee’s reporting requirements in
14 connection with the Initial Debtor Interview and 341 meeting, and filed and obtained approval of
15 numerous other administrative motions in furtherance of the case. In particular, the Debtor filed a motion
16 to set a bar date and obtain approval of claims procedures. After extensive negotiation, the Debtor and
17 the Committee were able to reach an agreed bar date and claims procedures order, which was entered by
18 the Court on July 25, 2023 (the “Bar Date Order”).

19 During the Interim Fee Period covered by this Interim Application, the Debtor’s efforts have been
20 focused on the continued claims review process, its continued coverage litigation brought against multiple
21 insurers in order to secure insurance coverage for sexual abuse claims, ongoing production of documents
22 and information to the Committee and to insurers, review of its assets, and mediation and other work
23 preparatory to achieving a consensual plan. Each of these areas is discussed in more detail below.

24 2. The Bar Date and Claims

25 The Bar Date Order established September 11, 2023, as the bar date for non-governmental claims
26 (the “Bar Date”). The Debtor timely completed all initial notice and service requirements under the Bar
27 Date Order, as set forth in (1) the *Certificate of Service* filed on August 4, 2023 [Docket No. 333], by
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1 Kurtzman Carson Consultants LLC (“KCC”), the claims and noticing agent for the Debtor, and (2) the
2 *Certificate of Counsel Regarding Compliance With Certain Provisions of the Bar Date Order* filed by the
3 Debtor on the same date [Docket No. 334].

4 Following the Bar Date, the Debtor and its professionals began the process of analyzing the filed
5 claims, with the assistance of KCC and its other professionals. Approximately 556 proofs of claim were
6 submitted, including a small number filed directly with the Court rather than submitted to KCC. Of these,
7 418 allege claims related to sexual abuse. During the Interim Fee Period, the Debtor continued its review
8 and analysis of the proofs of claim.

9 3. *Progress in the Insurance Coverage Litigation*

10 The insurance policies providing coverage for sexual abuse claims, maintained by the Debtor over
11 a period of several decades, are an essential asset of the estate. This coverage will be a critical part of any
12 plan of reorganization. On June 22, 2023, the Debtor filed its adversary proceeding complaint for
13 declaratory relief and breach of contract, seeking to liquidate the Debtor’s claims against numerous of its
14 historical insurers (the “Insurers”) [AP 23-04028, Docket No. 2]. On August 30, 2023, the Debtor filed
15 an additional adversary proceeding complaint, seeking declaratory relief and alleging breach of contract
16 against two additional Insurers [AP 23-04037, Docket No. 1].¹³ Any proceeds the Debtor wins in a
17 judgment in these adversary proceedings (collectively, the “Insurance Coverage Litigation”), or obtains
18 through a negotiated resolution, will infuse the estate with unrestricted cash assets, which can be used to,
19 among other things, contribute to unsecured creditor recoveries.

20 Following an initial round of motions to dismiss in late 2023, on December 18, 2023, the Debtor
21 filed its second amended complaint [AP 23-04028, Docket No. 161]. On January 12, 2024, the Debtor
22 filed its third amended complaint [AP 23-04028, Docket No. 163] (the “Third Amended Complaint”).

23 Although the Third Amended Complaint fully addressed the issues identified by the Court in its
24 ruling on the prior motions to dismiss, several of the Insurers continued to delay progress by filing further
25 motions to dismiss. In response to the Third Amended Complaint, the defendant Insurers variously filed
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¹³ One of these Insurers has since been dismissed without prejudice.

1 two motions to dismiss [AP 23-04028, Docket Nos. 173, 175], a motion to dismiss and/or for more definite
2 statement [AP 23-04028, Docket No. 171], and two answers [AP 23-04028, Docket Nos. 164, 165]. The
3 briefing is complete on these Insurer motions to dismiss (the “Motions to Dismiss”), and they are set for
4 hearing in the District Court on July 11, 2024.

5 The defendant Insurers also filed motions to withdraw the reference as to the Insurance Coverage
6 Litigation, on February 2 and February 6, 2024 [AP 23-04028, Docket Nos. 188, 190]. In order to avoid
7 unnecessary delay and additional cost to the estate, the Debtor filed statements of non-opposition to those
8 motions, and on March 18, 2024, the District Court ordered withdrawal of the reference as to the Insurance
9 Coverage Litigation.¹⁴

10 While the Debtor is working diligently to move forward with the Insurance Coverage Litigation,
11 the Insurers’ multiple rounds of motions to dismiss, coupled with the motions to withdraw the reference,
12 have created substantial cost and delay in the adjudication of the Debtor’s coverage claims. Nevertheless,
13 the Debtor is optimistic that the Insurance Coverage Litigation will proceed swiftly following the hearing
14 on the Motions to Dismiss. At the initial case management conference held on April 18, 2024, the District
15 Court made clear that discovery is not stayed pending the Motions to Dismiss, directed the parties to
16 complete initial disclosures, and authorized the Debtor to proceed with a motion for partial summary
17 judgment regarding the implications of the prior Clergy III settlements. During the Interim Fee Period,
18 Foley worked to prepare a dispositive motion regarding the Clergy III issue, in anticipation of filing after
19 resolution of the Motions to Dismiss. The Debtor also issued written discovery requests to the Insurer
20 defendants on May 24, 2024.

21 On May 29, 2024, Foley sent separate supplemental tender letters on behalf of RCBO to the Insurer
22 defendants in the Insurance Coverage Litigation, demanding they provide a defense for certain additional
23 claims covered by various policies issued to RCBO. Additionally, on May 30, 2024, Foley served separate
24 policy limits demand letters on behalf of RCBO to all the Insurer defendants (except the California
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27 ¹⁴ The remaining defendant Insurer in the second Insurance Coverage Litigation action also moved for
28 withdrawal of the reference on March 21, 2024, and that motion was subsequently granted. Both Insurance
Coverage Litigation matters are consolidated in front of Judge Corley in the District Court.

1 Insurance Guarantee Association (“CIGA”). These letters demanded that each Insurer indemnify RCBO
2 in the amount of the policy limits for each applicable insurance policy, and that each Insurer respond
3 within 30 days confirming it would do so. The work leading up to the service of these letters involved
4 substantial preparation, including analysis of Insurer-specific information regarding the particular claims
5 at issue and relevant policies providing coverage for those underlying claims, and drafting each separate
6 letter based on the specific claims and policies at issue for each Insurer. While the supplemental tender
7 letters and demand letters were sent in May, the preparation work began during the Interim Fee Period.

8 Separately from the Insurance Coverage Litigation, the Committee filed a motion in the
9 Bankruptcy Case seeking Rule 2004 discovery from the Insurers on October 5, 2023 [Docket No. 502]
10 (the “Committee 2004 Motion”). Following extensive briefing on objections filed by the Insurers, the
11 Court orally granted the Committee 2004 Motion at a hearing on November 14, 2024. The Court entered
12 its order granting the Committee 2004 Motion on January 18, 2024, authorizing the Committee to issue
13 subpoenas to the Insurers [Docket No. 796] (the “2004 Order”). In the meantime, on December 15, 2023,
14 Certain Underwriters at Lloyd’s, London (“LMI”) filed a motion asking the Court to reconsider or
15 “clarify” its November 14 ruling on the Committee 2004 Motion [Docket No. 697] (the “LMI Motion to
16 Reconsider”), which was denied by the Court at a hearing held on February 12, 2024. After the LMI
17 Motion to Reconsider was denied, LMI appealed the underlying 2004 Order as to the issues of reserves
18 and underwriting information. In connection with its appeal, LMI filed a motion for leave to appeal the
19 interlocutory 2004 Order [Docket No. 906] (the “LMI Motion for Leave”), and also sought a stay from
20 this Court [Docket No. 907] (the “LMI Motion for Stay”). This Court granted a stay pending appeal only
21 for sufficient time for the District Court to consider a parallel stay motion filed there (the “District Court
22 Stay Motion”), indicating that the request for a stay would otherwise be denied. The appeal is currently
23 pending before the District Court, along with the District Court Stay Motion.¹⁵

24 In addition to the LMI appeal, after the 2004 Order was entered, motions to quash or for a
25 protective order regarding claims files, reserves information, and underwriting information were filed in
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27 ¹⁵ As to at least the issue of reserves information, it would appear that the appeal is largely, if not entirely, mooted
28 by the Court’s ruling on the subsequent Competing Discovery Motions described below.

1 March by Insurers LMI [Docket Nos. 918 and 992 (transferred from NJ)], American Home [Docket No.
2 920], and Westport [Docket No. 920]. The Committee also filed a competing motion to enforce the 2004
3 Order (together with the foregoing Insurer motions, the “Competing Discovery Motions”). After further
4 extensive briefing, the Court heard these Competing Discovery Motions at a hearing on April 26, 2024.
5 At a subsequent hearing on May 9, 2024, the Court delivered its ruling on the Competing Discovery
6 Motions, holding that Insurers would not be required to produce reserves information or claims files, but
7 would be required to produce underwriting information.¹⁶ While the Debtor avoided taking a direct role
8 in response to the Competing Discovery Motions in order to control administrative expenses, it has still
9 been necessary for Foley to actively monitor the dispute, including reviewing and analyzing filings and
10 attending hearings.

11 4. Production of Documents to the Committee and Insurers

12 The Debtor and the Committee have continued to engage constructively with each other regarding
13 the exchange of information and production of documents. Counsel for the Debtor, the Debtor’s financial
14 consultants Alvarez & Marsal North America, LLC (“A&M”) and VeraCruz Advisory, LLC
15 (“VeraCruz”), counsel for the Committee, and the Committee’s financial consultant BRG have had
16 continuous discussions regarding document production by the Debtor in response to the Committee’s
17 diligence efforts and extensive information requests. The Committee has made multiple statements to the
18 Court acknowledging the Debtor’s cooperation in sharing information and documents.

19 During the Interim Fee Period, the Debtor’s production of documents to the Committee has been
20 ongoing, in response to more than 180 specific requests. The Debtor has prioritized requests that the
21 Committee professionals have identified as most important for furtherance of mediation. The Debtor also
22 helped facilitate the Committee’s informal discovery requests to certain non-debtor Catholic entities
23 within the Diocese (the “Non-Debtor Catholic Entities”), in furtherance of the Committee’s diligence
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27 ¹⁶ The Court reserved specific determinations of privilege as to particular documents for future determination
28 based on privilege logs, to the extent necessary. The Committee withdrew its motion to enforce based on the Court’s
ruling at the May 9 hearing.

1 process. This enabled the exchange of information and documents without the need for additional Rule
2 2004 motions or subpoenas to non-debtors.

3 Counsel for the Debtor has participated in meetings with counsel for the Insurers, as well as special
4 insurance counsel for the Committee, also for the purpose of moving the Bankruptcy Case forward in a
5 constructive direction with regard to insurance coverage for sexual abuse claims. The Debtor has now
6 produced to every Insurer that signed the required confidentiality provisions all documents related to abuse
7 claims that were previously produced to the Committee. Likewise, the Debtor has provided the proofs of
8 claim to every Insurer that has complied with the relevant confidentiality provisions of the Bar Date Order.
9 Production of the proofs of claim was made possible by resolution of the Committee's motion for a
10 protective order regarding sharing of proof of claim information, which the Court granted by order entered
11 on March 19, 2024.

12 5. Work Toward Achieving a Confirmable Plan of Reorganization

13 The Debtor's objective in this Bankruptcy Case is to achieve confirmation of a plan of
14 reorganization that will (a) ensure a fair and equitable outcome for survivors of sexual abuse, and (b) allow
15 the Debtor to stabilize its finances, continue its mission to serve the needs of the faithful within the Diocese
16 of Oakland, and continue to provide services to underserved people and groups in the East Bay. As set
17 forth herein, it has made substantial progress in setting the necessary groundwork for achieving all of these
18 goals through mediation of a consensual plan.

19 On April 5, 2024, the Debtor filed its *Third Motion for Order Extending Exclusive Periods for the*
20 *Debtor to File and Confirm a Plan of Reorganization* [Docket No. 1028] (the "Third Exclusivity Motion").
21 The Third Exclusivity Motion was granted by the Court's order entered on April 24, 2024 [Docket No.
22 1088], which extended the Debtor's exclusive right to file a plan through September 6, 2024, and its
23 exclusive right to seek acceptances of a filed plan through November 5, 2024.

24 In light of the current exclusivity deadlines, Foley and the Debtor, in coordination with the
25 Debtor's other professionals, have undertaken significant work during the Interim Fee Period to further
26 preparations for filing a plan of reorganization. This has included significant research into plans that have
27 been confirmed in other diocesan bankruptcies, as well as those with similar tort claimant classes. It has
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1 also involved analysis of the Debtor’s assets which could be used to fund a plan, the treatment of classes
2 of claims, and other statutory requirements for plan confirmation. Foley has held regular meetings with
3 the steering committee formed by the Debtor to guide the plan process, to strategize as to form of the plan
4 and the means to implement it, and to obtain an understanding of the Debtor’s operational needs to ensure
5 that the plan terms preserve the Debtor’s continued ability to operate and serve its mission and parishioners
6 post-confirmation.

7 Part of Foley and the Debtor’s work to prepare a confirmable plan includes attempting to resolve
8 case-determinative issues with the Committee, and to resolve the pending Insurance Coverage Litigation
9 with the Debtor’s Insurers regarding the insurance coverage available to the Debtor. To that end, on
10 December 19, 2023, the Debtor and the Committee filed the *Joint Motion for Entry of an Order Referring*
11 *Parties to Mediation, Appointing Mediators and Granting Related Relief* [Docket No. 705] (the “Joint
12 Mediation Motion”). Multiple hearings and responsive filings, and numerous iterations of the proposed
13 order on the Joint Mediation Motion, were required in order to address objections filed by multiple
14 Insurers. On January 22, 2024, the Court entered an order referring the parties to mediation, appointing
15 the mediators agreed to by the parties, and identifying the matters for mediation, both as between the
16 Debtor and the Committee, and between the Debtor and its Insurers [Docket No. 810] (the “Mediation
17 Order”). The matters for mediation and the specifics of the mediation process are more fully set forth in
18 the Mediation Order.

19 The Committee and the Debtor each met individually with mediators Judge Sontchi and Jeff
20 Krivis, exchanged initial proposals, and participated in the first round of joint mediation on March 18 and
21 19, 2024. Additional joint mediation sessions were held on multiple dates in April and May. While the
22 Debtor is committed to the mediation process and is optimistic that it will ultimately lead to a consensual
23 plan of reorganization between the Debtor and Committee, there are many complex and difficult issues to
24 work through, and mediation will take multiple months. Further joint mediation sessions with the
25 Committee are scheduled for June, August, and September 2024.

26 The Debtor is also making progress toward mediation with the Insurers. While the Debtor is
27 committed to seeking a consensual resolution if possible, this has been impacted by the approach of many
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1 of the Insurers to the Insurance Coverage Litigation. The Debtor has been forced to respond to multiple
2 rounds of motions to dismiss filed by many of the Insurer defendants, including the currently pending
3 Motions to Dismiss the Third Amended Complaint, which were filed and briefed during the Interim Fee
4 Period as described above. Nevertheless, in furtherance of mediation, the Debtor’s counsel met
5 independently with mediators Judge Newsome and Tim Gallagher on March 13, 2024, to prepare for
6 mediation related to the Insurance Coverage Litigation and the Debtor anticipates that initial joint
7 mediation sessions with the Insurers will be held soon. Several Insurers plan to send their counsel to meet
8 with the Committee, Debtor, and mediators at the two-day mediation session scheduled for June 18-19,
9 2024.

10 The mediation process between the Debtor and Committee, and between the Debtor and the
11 Insurers, is a critical step toward the Debtor’s goal of reaching a consensual plan of reorganization. It is
12 crucial that the Debtor be given time to engage in this process, which is still in its early stages, in the
13 coming months without the interference and distraction of competing plans.

14 6. Other Motions and Filings in Furtherance of the Bankruptcy Case

15 While the primary areas of the Debtor’s focus during the Interim Fee Period are described above,
16 Foley also addressed numerous other matters during the Interim Fee Period, as briefly summarized below,
17 and further described in the individual category narratives in the following section.

18 On January 10, 2024, the Debtor filed its *Second Motion for Entry of an Order, Pursuant To*
19 *Bankruptcy Rules 9006 and 9027, Enlarging The Period Within Which The Debtor May Remove Actions*
20 *Pursuant To 28 U.S.C. § 1452* [Docket No. 770] (the “Removal Extension Motion”), which was granted
21 by the Court’s order entered on February 2, 2024 [Docket No. 840], extending the deadline for removal
22 of state court actions through August 5, 2024.

23 On March 6, 2024, the Debtor filed its *Third Motion to Extend Deadline to Assume or Reject*
24 *Unexpired Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) of the Bankruptcy Code*
25 [Docket No. 924] (the “365 Motion”), seeking an extension of time to assume or reject the Debtor’s lease
26 with Catholic Cathedral Corporation of the East Bay (“CCCEB”) for use of the Oakland Cathedral
27 complex, including both the Cathedral of Christ the Light and the Debtor’s central offices. The 365
28

1 Motion was granted by the Court's order entered on March 26, 2024 [Docket No. 1011], which extended
2 the Debtor's time to assume or reject the CCCEB lease through October 1, 2024.

3 In addition to the foregoing, it was necessary for the Debtor to address the following filings and
4 other matters, and Foley incurred significant time in addressing these matters on the Debtor's behalf during
5 the Interim Fee Period:

- 6 • The *Motion to Allow Filing of Late Proofs of Claim* [Docket No. 607], filed on
7 November 10, 2023, by counsel for eighteen claimants whose proofs of claim were
8 filed one day after the Bar Date. This motion was filed during the prior interim
9 period but came for hearing on January 9, 2024, during the Interim Fee Period
10 covered herein.
- 11 • The Joint Mediation Motion, as described above. While the Joint Mediation Motion
12 was filed during the prior interim period, extensive work was required during the
13 Interim Fee Period to address the Insurers' objections and ultimately obtain entry
14 of the Mediation Order.
- 15 • The second round of interim fee applications for estate professionals were filed on
16 February 13-15, 2024, and came before the Court for hearing on March 19, 2024.
- 17 • The *Debtor's Status Conference Statement for Bankruptcy Case* [Docket No. 760],
18 for the January 9, 2024, Chapter 11 status conference in the Bankruptcy Case.
- 19 • The LMI Motion to Reconsider, LMI Motion for Leave, and LMI Motion for Stay,
20 and District Court Stay Motion, as described above.
- 21 • The *United States Trustee's Motion for Order Appointing Fee Examiner and*
22 *Establishing Procedures for Requesting Professional Compensation and*
23 *Reimbursement of Expenses* (the "Fee Examiner Motion") [Dkt. No. 729], filed by
24 the US Trustee on December 27, 2023.
- 25 • Filings regarding the form of the confidentiality and protective order to govern
26 discovery in both the Bankruptcy Case and the Insurance Coverage Litigation,
27 leading to entry of the *Confidentiality and Protective Order* ultimately entered on
28 January 30, 2024 [Docket No. 832] (the "Confidentiality Order").
- The *Debtor's Status Conference Statement for Bankruptcy Case* [Docket No. 843],
for the February 7, 2024, Chapter 11 status conference in the Bankruptcy Case.
- The *Request for Entry of Order Granting Official Committee of Unsecured*
Creditors' Motion For a Protective Order Preventing Disclosure of Survivor
Information [Docket No. 894], filed by the Committee.
- The Competing Discovery Motions, as described above.
- The *Debtor's Motion For a Supplemental Order Increasing the Monthly Caps*
Authorized Under the Court's Previous Order (I) Authorizing the Retention and
Payment, Effective as of the Petition Date, of Professionals Utilized By the Debtor
in the Ordinary Course of Business and (II) Granting Related Relief [Docket No.

1 1031], filed by the Debtor in order to address required changes in the monthly
2 compensation caps for ordinary course professionals.

- 3 • The *Motion to Allow Filing of Late Proof of Claim* [Docket No. 1081], filed by a
4 single claimant seeking relief from the Bar Date based on excusable neglect.

5 7. *Compliance with Bankruptcy Obligations*

6 Since the Petition Date, the Debtor has operated its business as a debtor in possession. During the
7 Interim Fee Period, the Debtor has timely filed all of its required *Monthly Operating Reports* [Docket Nos.
8 804, 892, 999, and 1078], as well as its *Periodic Report Regarding Value, Operations, and Profitability*
9 *of Entities in Which the Debtor's Estate Holds a Substantial or Controlling Interest* [Docket No. 890]
10 regarding its interest in the Catholic Telemedia Network. The Debtor has also paid all of its required
11 quarterly fees to the US Trustee to date.

12 8. *Appointment of Fee Examiner*

13 On May 10, 2024, the Court entered its *Order Appointing Fee Examiner and Establishing*
14 *Procedures for Review of Interim and Final Fee Applications Filed By Estate Professionals* [Docket No.
15 1122] (the "Fee Examiner Order"), granting the Fee Examiner Motion and appointing David M. Klauder,
16 Esq. of Bielli & Klauder, LLC (the "Fee Examiner") as fee examiner in this Bankruptcy Case effective as
17 of May 10, 2024.

18 **III. SERVICES RENDERED¹⁷**

19 In accordance with the *United States Bankruptcy Court Northern District of California Guidelines*
20 *for Compensation and Expense Reimbursement of Professionals and Trustees* (the "Northern District
21 Guidelines") and the Local Bankruptcy Rules for the Northern District of California (the "Local Rules"),
22 Foley has attempted to place the services performed in the category that best relates to the service
23 provided. However, because certain services affected multiple categories, services pertaining to one
24 category may occasionally be included in another category. The fact that similar services appear in several
25 different categories did not result in any duplication of work or billing. Further, given the size and
26 complexity of this case, Foley submits that limiting each category to \$20,000 is not practicable.

27 ¹⁷ The totals listed in this section for each category do not reflect the discount for *de minimis* timekeepers which
28 is included in the total fees requested.

1 During the Interim Fee Period, there were instances where more than one attorney from Foley
 2 participated in meetings, hearings, or other matters. Sometimes, this participation was for less than the
 3 full meeting or hearing, for efficiency. In the Debtor and Foley's opinion, the complex nature of the case
 4 requires different attorneys within Foley to work on different work streams, each focused on particular
 5 issues and matters, but together contributing to the overall case strategy. As a result, Foley believes it was
 6 appropriate to keep multiple attorneys familiar with these matters in order to more efficiently render
 7 services and provide the most effective representation to the Debtor. In the Debtor and Foley's opinion,
 8 this did not lead to duplicative or unnecessary services for the Debtor.

9 Foley has established the following billing categories in this case to date:

001 – Administrative Expense Claims
002 – Asset Sales/ 363 Sales
003 – Automatic Stay
004 – Bankruptcy Litigation/Adversary Proceedings
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues
006 – Case Administration (Docket Updates, WIP and calendar)
007 – Chapter 11 Plan/Plan Confirmation
008 – Communications with Client
009 – Corporate Governance and Board Issues
010 – Vendor Issues
011 – Cash Management
012 – Disclosure Statement
013 – Employee Issues
014 – Exclusivity
015 – Executory Contracts/Lease Issues
016 – General Case Strategy (includes calls with client and team calls)
017 – Hearings and Courts Matters
018 – Non-Bankruptcy Litigation
019 – Reserved
020 – Retention/Billing/Fee Applications for Debtor Professionals
021 – Retention/Fee Applications: Ordinary Course Professionals
022 – Retention/Fee Applications: Other Professionals
023 – Schedules/Statement of Financial Affairs
024 – Tax Issues
025 – U.S. Trustee Issues/Meetings/Communications/Monthly Operating Report
026 – Unsecured Creditors Issues/Communications/Meetings
027 – Real Estate and Real Property Issues

028 – Tort Claims
029 – Non-Tort Proofs of Claim
030 – Insurance Issues (other than coverage)
031 – Insurance Issues (coverage)
032 – Rule 2004 Motions/Discovery/Subpoenas
033 – First Day Motion Practice
034 – Other Motion Practice
035 – General Counsel Matters
036 – Secured Creditor Matters
037 – Financing
038 – Mediation

Exhibit G includes Foley’s invoices for the Interim Fee Period, which includes a detailed breakdown of the time entries and expenses incurred, by task category.

Foley has agreed that it will not charge the Debtor for the travel time undertaken by its attorneys and other professionals. During the Interim Fee Period, Foley incurred, but did not charge the Debtor for, 207.2 hours of travel time, totaling \$186,997.50 in fees not charged to the Debtor.

A. Automatic Stay (003)

Total Hours 27.60/Total Fees \$21,236.50

During the Interim Fee Period, Foley, among other things, addressed matters related to state court abuse litigation, including evaluating the stay-related implications of more actions being added to the coordinated proceedings in Alameda County, and addressing potential stay violations. In particular, Foley addressed multiple attempts at service of summonses in state court actions in violation of the stay, including developing a coordinated response, sending letters to the firms involved, and further correspondence to confirm that further violations of the stay would not occur. Foley also continued to analyze the impact of the Debtor’s automatic stay on co-defendants in the state court abuse litigation, including evaluating implications of claims against Non-Debtor Catholic Entities on insurance policies that are property of the bankruptcy estate.

B. Bankruptcy Litigation/Adversary Proceedings (004)

Total Hours 28.20/Total Fees \$20,808.50

During the Interim Fee Period, work in this category primarily related to seeking turnover of estate property from a trust and evaluating the potential relief that could be obtained. This included analyzing

1 the facts related to the potential trust distribution, communications with the Debtor and coordination with
2 the Debtor's trusts and estates counsel, Plageman, Lund & Cannon LLP,¹⁸ researching and analyzing
3 federal jurisdictional issues specific to probate matters and preparing a demand letter to the trustee of the
4 trust.

5 **C. Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues (005)**

6 **Total Hours 170.20/Total Fees \$105,437.50**

7 The general Bar Date for filing proofs of claim for non-governmental claims, including abuse
8 claims as well as other claims, was September 11, 2023. Immediately after the Bar Date, the Debtor and
9 Foley began the process of analyzing the filed claims, with the assistance of KCC and other professionals.
10 Approximately 556 proofs of claim were filed on or before September 12, 2023 (the date after the Bar
11 Date), including a small number that were filed with the Court, rather than with KCC. Of these, 418
12 asserted abuse survivor claims, including approximately 20 duplicate claims already identified, with the
13 remainder being primarily commercial vendor claims. Based on the Debtor and KCC's review to date,
14 approximately 363 (or approximately ninety percent) of the above claims included some form of the
15 optional supplement along with the Form 410 official proof of claim form.

16 During the Interim Fee Period, Foley's primary focus regarding claims was assisting the Debtor in
17 connection with preparation for and participation in mediation with the Committee and with its Insurers.
18 Foley continued to work with the claims-review team at A&M, the Debtor's Court-approved financial
19 advisors, in the ongoing detailed review of abuse claims along with the filed optional supplements. This
20 work involved extensive analysis by Foley regarding essential issues related to, among other things, study
21 of church assignments related to claims, claim valuation methodology, potential exclusionary criteria for
22 objectionable claims, historical claim settlements, and analysis of claims as to which the Debtor does not
23 bear legal responsibility. Foley also participated in numerous meetings and communications with the
24 claims-review professionals at A&M, as well as the Debtor's leadership. Foley has continued to work
25 with the Debtor to update its records as additional optional supplements or amended proofs of claim have
26

27
28

¹⁸ The Plageman firm is employed as an ordinary course professional.

1 been filed. This work was critical and necessary in preparation for mediation, and well as for development
2 of a plan of reorganization that provides fair and equitable treatment to claimants.

3 Throughout the Interim Fee Period, Foley and A&M continued to communicate regularly with the
4 Committee and Stout Risius Ross, LLC (“Stout”), the Committee’s consultant on the valuation of abuse
5 claims, regarding the claims review process. This included an early January claims-review meeting with
6 Committee professionals and responding to information requests from Committee counsel.

7 The Debtor, aided by Foley and the claims-review team at A&M, engaged in discussions, subject
8 to mediation privilege, with the Committee, aided by Stout, based on each side’s review of the abuse
9 claims.

10 Additionally, Foley worked to address a motion to authorize a late-filed claim, filed by counsel for
11 a claimant that filed a late claim in January 2024. This included communications with counsel for the
12 claimant regarding the basis for counsel’s claim of excusable neglect, analysis of the issues in light of the
13 applicable standard, advising the client, and ultimately filing a non-opposition to the motion reserving the
14 Debtor’s rights to object to the claim on other grounds and to object to any other late-filed claims.

15 During the Interim Fee Period, Foley continued to work to ensure that all necessary steps are taken
16 to protect the confidentiality of abuse-claim information, including the personally identifiable information
17 of abuse claimants.

18 **D. Case Administration (docket updates, WIP, and calendar) (006)**

19 **Total Hours 98.20/Total Fees \$42,463.00**

20 During the Interim Fee Period, Foley, among other things, worked on (i) general case
21 administration such as reviewing and calendaring matters before the Court, including maintenance of
22 Foley’s Master Case Calendar and timeline; (ii) preparing updates regarding filed documents to timely
23 inform the entire case team of new issues; and (iii) updating and maintaining the Core Service List. Foley
24 uses attorneys to conduct its reviews of pleadings and calendaring matters given the critical nature of these
25 items. However, to be mindful of costs, Foley primarily staffs an associate attorney and a paralegal on
26 these matters with limited review by a partner.

1 **J. Employee Issues (013)**

2 **Total Hours 1.30/Total Fees \$868.00**

3 Time in this task code related to work briefly addressing issues related to priest retirement and
4 long-term care plans.

5 **K. Exclusivity (014)**

6 **Total Hours 13.90/Total Fees \$9,680.00**

7 Foley's work during the Interim Fee Period related primarily to obtaining a further extension of
8 exclusivity. During the Interim Fee Period, Foley prepared and filed the Debtor's Third Exclusivity
9 Motion. The Court granted the Third Exclusivity Motion, extending the Debtor's exclusive right to file a
10 plan of reorganization through September 6, 2024, and its exclusive right to solicit acceptance of a plan
11 of reorganization through November 5, 2024.

12 **L. Executory Contracts/ Lease Issues (015)**

13 **Total Hours 19.00/Total Fees \$13,195.00**

14 During the Interim Fee Period, Foley incurred time primarily in connection with its lease
15 agreement with CCCEB for use of the Oakland Cathedral complex property, which houses both the
16 Cathedral of Christ the Light and the Debtor's central offices. Foley prepared and filed a motion seeking
17 a further extension of the deadline to assume or reject this agreement, together with a stipulation with
18 CCCEB consenting to the extension. The Court granted the motion, extending the Debtor's deadline to
19 assume or reject the CCCEB lease through October 1, 2024.

20 **M. General Case Strategy (includes teams calls) (016)**

21 **Total Hours 184.00/Total Fees \$149,047.00**

22 This task code includes Foley's time incurred on both essential communications among the
23 Debtor's restructuring team and professionals, and work on case strategy and planning. In connection
24 with communications, Foley, among other things, (i) held internal team coordination calls only when
25 needed to ensure the core group of attorneys working on the case were up to date on all case matters and
26 could coordinate the various work streams; and (ii) held regular meetings as necessary with the Debtor's
27 other professionals (e.g., A&M and the communications team) to align on various issues in the case. This
28

1 time also includes communications between various Foley team members as necessary to coordinate on
2 various work streams and projects. For ease of analysis, the internal communications and meetings within
3 Foley and between Foley and other Debtor professionals are generally included in this task code, unless
4 they related to a specific issue included in another task code. In some cases, professionals attended and
5 billed for only a portion of a meeting.

6 In connection with case strategy and planning, Foley researched and strategized regarding issues
7 including: (i) analysis of other Diocesan bankruptcy cases, in order to evaluate implications for the
8 Debtor's reorganization; (ii) Canon Law issues in coordination with the Debtor's canon law expert; and
9 (iii) evaluation of case timeline and status and formulation of strategy regarding case management. A
10 substantial portion of the time in this task code, particularly during January, involved preparation of a
11 detailed and comprehensive case strategy memorandum requested by the Debtor's leadership.

12 N. **Hearings and Court Matters (017)**

13 **Total Hours 68.10/Total Fees \$55,535.00**

14 During the Interim Fee Period, Foley prepared for and represented RCBO at hearings including (i)
15 multiple status conferences; (ii) a hearing on January 9, 2024, regarding the Debtor and Committee's Joint
16 Mediation Motion, a motion to treat certain late-filed claims as timely, and the LMI Motion to Reconsider;
17 (iii) a January 17, 2024, continued hearing on the Joint Mediation Motion; (iv) a February 7, 2024, hearing
18 on the US Trustee's Fee Examiner Motion and continued hearing on the LMI Motion to Reconsider; (v)
19 a February 12, 2024, hearing regarding the status of motions to withdraw the reference as to the Insurance
20 Coverage Litigation, as well as the Motions to Dismiss, and other matters; (vi) a March 19, 2024, status
21 conference regarding various discovery motions and hearing on fee applications; (vii) an April 23, 2024,
22 status conference on the Competing Discovery Motions regarding the Committee's Rule 2004 discovery
23 directed at the Insurers, and the US Trustee's Fee Examiner Motion; and (viii) an April 26, 2024, hearing
24 on the Competing Discovery Motions. Foley also prepared for and attended an April 18, 2024, District
25 Court case management conference in the Insurance Coverage Litigation. Foley only billed time for its
26 attorneys where Foley believes they were necessary and actively supported the Debtor's position at the
27 hearing. In some cases, additional Foley attorneys were present at a hearing but did not bill their time for
28

1 the hearing. This task code also includes a relatively small amount of time addressing issues related to
2 scheduling of hearings and confirming remote appearances.

3 **O. Non-Bankruptcy Litigation (018)**

4 **Total Hours 8.50/Total Fees \$6,915.50**

5 Time in this task code relates primarily to the JCCP 5108 Superior Court coordinated proceedings,
6 as they relate to bankruptcy issues. Foley (i) prepared for and attended case management conferences in
7 JCCP 5108 in order to monitor matters that could potentially affect the automatic stay or the Bankruptcy
8 Case, and to address bankruptcy issues arising in the case management conferences; (ii) communicated
9 with defense liaison counsel regarding JCCP 5108; and (iii) addressed potential add-on of uncoordinated
10 state court cases to JCCP 5108, including evaluation of potential automatic stay issues related to same.

11 **P. Retention/Billing/Fee Applications for Debtor Professionals (020)**

12 **Total Hours 128.20/Total Fees \$86,261.50**

13 During the Interim Fee Period, Foley, among other things, (i) prepared its monthly fee statements
14 for December 2023, and January, February, and March 2004; (ii) prepared Foley's Second Interim Fee
15 Application; (iii) analyzed issues relating to the potential appointment of the Fee Examiner, including the
16 implications for timing of interim fee applications; (iv) coordinated with other professionals in order to
17 prepare and file a joint notice of hearing on second interim fee applications; (v) assisted the Debtor's other
18 professionals with fee statements and second interim fee application; (vi) worked with the US Trustee to
19 stipulate to extend the US Trustee's objection deadline; (vii) reviewed and analyzed US Trustee objections
20 to fee applications; (viii) negotiated with the US Trustee regarding its objections¹⁹, and prepared notices
21 regarding agreed reductions; and (ix) prepared a combined order approving fee applications.

22 **Q. Retention/Fee Applications: Ordinary Course Professionals (021)**

23 **Total Hours 29.70/Total Fees \$21,459.50**

24 During the Interim Fee Period, Foley addressed necessary issues regarding employment and
25 compensation of ordinary course professionals, including, among other things, (i) finalizing the
26

27 ¹⁹ Foley has not billed the Debtor for the time it spent responding to the US Trustee's objections to its Second
28 Interim Fee Application.

1 employment of Dr. Matthew Kemner as an ordinary course professional; (ii) preparing and filing the
2 Debtor’s quarterly report regarding compensation to ordinary course professionals and compliance with
3 the Court’s order regarding the retention of Ordinary Course Professionals [Docket No. 263] (the “OCP
4 Order”); and (iii) coordinating with the Debtor regarding payment of ordinary course professionals in
5 compliance with the OCP Order.

6 For a number of reasons, including the retention of Dr. Kemner by the Debtor, the retirement of
7 the Debtor’s long-time CFO and transition of his responsibilities, and the anticipated shifting of
8 responsibilities from A&M to VeraCruz in order to reduce monthly professional fees, the Debtor
9 determined that the maximum compensation caps under the OCP Order would need to be modified. Foley
10 therefore prepared and filed a motion seeking a supplemental order increasing the monthly compensation
11 limits in order to accommodate these changes, which was granted by the Court. In connection with this
12 motion, Foley addressed an informal objection by the Committee regarding continued treatment of
13 VeraCruz as an OCP in light of its increased scope of responsibility and negotiated an agreement for
14 employment of VeraCruz as a professional under Sections 327 and 328 of the Bankruptcy Code.

15 **R. Retention/Fee Applications: Other Professionals (022)**

16 **Total Hours 13.10/Total Fees \$7,884.50**

17 During the Interim Fee Period, Foley, among other things, (i) reviewed issues related to the
18 compensation and monthly fee statements of professionals retained by the Committee; (ii) addressed
19 issues regarding compensation of the Court-appointed mediators; and (iii) communicated with those
20 professionals related to approved payments.

21 **S. U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Report (025)**

22 **Total Hours 31.20/Total Fees \$23,740.00**

23 During the Interim Fee Period, Foley, among other things, assisted the Debtor with final review
24 and filing of monthly operating reports (“MORs”). In order to minimize professional fee expenses,
25 Foley’s work on MORs was largely limited to final review of the MORs and addressing specific questions
26 and issues. Foley also assisted with the transition of MOR support work from A&M to VeraCruz, which
27 was done in order to reduce the Debtor’s administrative expense load. In addition, a substantial amount
28

1 of the work in this task code during the Interim Fee Period related to preparation of a Rule 2015.3 periodic
2 report regarding the Debtor's interest in CTN. This included coordination with CTN's counsel and
3 counsel for AT&T regarding confidentiality concerns and objections to disclosure of CTN's confidential
4 information in connection with the report. A small amount of time also related to communications with
5 US Trustee representatives regarding various other matters.

6 **T. Unsecured Creditor Issues/Communications/Meetings (026)**

7 **Total Hours 18.80/Total Fees \$15,997.50**

8 During the Interim Fee Period, this category reflects Foley's time incurred in communications with
9 the Committee's professionals and responding to Committee information requests. This included
10 numerous telephone and video conferences, as well as written communications, with counsel for the
11 Committee on issues of mutual concern, including the course of the case generally, discovery disputes
12 between the Committee and Insurers, Committee questions regarding CCCEB payments, restricted vs.
13 unrestricted funds, assets of the Debtor, inquiries regarding Non-Debtor Catholic Entities and their assets,
14 Committee information requests, matters related to the state court coordinated proceeding, claims
15 information, and coordination regarding hearings. In addition to communications with Committee
16 professionals, this task code includes time incurred by Foley attorneys in coordinating internally and with
17 the Debtor and A&M regarding responses to the Committee's information requests.

18 **U. Real Estate and Real Property Issues (027)**

19 **Total Hours 37.70/Total Fees \$33,701.50**

20 During the Interim Fee Period, much of Foley's time incurred was related to evaluation of real
21 estate assets of both the Debtor and Non-Debtor Catholic Entities. This included, among other things,
22 (i) identification and valuation of real property which potentially may be monetized in this Bankruptcy
23 Case; (ii) evaluation of issues related to disposition of undeveloped real property in Livermore owned by
24 Adventus; and (iii) meetings and communications with the Debtor's leadership, VeraCruz, and A&M
25 regarding real estate assets.

26 During the Interim Fee Period, Foley continued to investigate allegations from the City of
27 Pittsburg, California alleging that the client was responsible for remediation of blockage of the Kirker
28

1 Creek drainageway which resulted in the flooding of dozens of houses in the area from a catastrophic
2 atmospheric river weather event. However, Foley’s investigation revealed decades of neglect by the City
3 of the drainageway which caused the flooding to occur. Further, the burden is on the City to design the
4 improvements needed for Kirker Creek to handle the increased water flow and to maintain the creek
5 drainageway. While no specific design has yet been put forth by the City, the grading and structural
6 improvements will likely be in the millions of dollars. An insurance claim has been initially denied.
7 However, Foley is working to reverse that determination based upon facts discovered after the insurance
8 denial. Foley’s work on these issues has included reviewing numerous reports and real property records,
9 working closely with an expert engineering firm to research the situation and inspect the property,
10 analyzing the related legal issues, assisting the Debtor with review of proposals from engineering
11 consultants for demolition of damaged improvements resulting from the flooding, research and analysis
12 of the “police powers” exception to the automatic stay in connection with the City’s demands, and
13 communicating with Pittsburg’s City Attorney. Foley’s work on this matter was necessary because of the
14 significant costs of repairs, the disputed status of insurance coverage, and the implications of the City’s
15 assertions regarding the Debtor’s liability.

16 **V. Tort Claims (028)**

17 **Total Hours 33.60/Total Fees \$28,818.50**

18 This task code captures Foley’s time incurred in addressing matters related to state court sexual
19 abuse actions, to the extent the time is not reflected in task code 018, above. In general, time included in
20 018 relates to automatic stay and bankruptcy matters related to the JCCP 5108 proceedings, whereas time
21 in this task code relates primarily to non-bankruptcy issues. During the Interim Fee Period, Foley, among
22 other things, (i) evaluated and responded to a request from plaintiff’s counsel to amend a complaint as to
23 a non-debtor defendant; (ii) researched and analyzed case law and data on prior verdicts and settlements
24 in abuse cases, and prepared a memorandum to the client; and (iii) monitored the JCCP 5108 proceedings
25 and updated a tracking document maintained by Foley. Foley uses a paralegal (Kerry Farrar) to handle
26 the majority of tracking of state court claims for efficiency.

1 **W. Non-Tort Proofs of Claim (029)**

2 **Total Hours 4.40/Total Fees \$3,092.50**

3 During the Interim Fee Period, Foley’s work related to non-tort claims, as reflected in this task
4 code, including (i) brief review and analysis of the register of non-tort claims; (ii) communications with
5 Committee counsel regarding the non-tort claims register; and (iii) evaluating issues related to a late-filed
6 proof of claim from a trade vendor and confirmation that the claimant was properly served with the Bar
7 Date Order and related papers.

8 **X. Insurance Issues (coverage, incl. adversary proceeding) (031)**

9 **Total Hours 648.50/Total Fees \$415,614.00**

10 During the Interim Fee Period, Foley continued to actively prosecute the Debtor’s coverage
11 litigation in the Insurance Coverage Litigation. The Debtor’s insurance coverage for abuse claims is one
12 of the largest assets available to compensate claimants. Aggressively pursuing the Insurance Coverage
13 Litigation is essential to preserving and maximizing this asset for the benefit of its estate and the claimants.

14 The Debtor filed its Third Amended Complaint in the Insurance Coverage Litigation on January
15 12, 2024, and the time in this task code includes Foley’s work in preparing, revising, and finalizing the
16 Third Amended Complaint. This included preparation of an exhibit reflecting extensive detail on tendered
17 claims and coverage, in order to address arguments raised by the Insurer defendants in their previous
18 motions to dismiss. The Insurers filed their responses to the Third Amended Complaint in late January,
19 including (1) CIGA’s Motion to Dismiss the Third Amended Complaint or for a more definite statement
20 [AP 23-04028, Docket No. 171], (2) Continental Casualty Company, United States Fire Insurance
21 Company, and LMI’s Motion to Dismiss the Third Amended Complaint [AP 23-04028, Docket No. 173],
22 and (3) Pacific Indemnity Company, Century Indemnity Company, Pacific Employers Insurance
23 Company, and Westchester Fire Insurance Company’s Motion to Dismiss the Third Amended Complaint
24 or for a more definite statement [AP 23-04028, Docket No. 175]. Two Insurers (Travelers and Westport)
25 filed answers rather than moving to dismiss. Foley reviewed and analyzed the responses to the Third
26 Amended Complaint and prepared a detailed report to the client summarizing the responses. Foley also
27 researched and prepared oppositions to the Motions to Dismiss. Given the case-dispositive nature of the
28

1 Motions to Dismiss, and the importance of insurance coverage to the Debtor's reorganization, this was a
2 significant project that required a substantial investment of time.

3 While the Motions to Dismiss were pending, two separate motions to withdraw the reference as to
4 the Insurance Coverage Litigation were filed by (1) Pacific Indemnity Company, Insurance Company of
5 North America, Pacific Employers Insurance Company, Westchester Fire Insurance Company, Westport
6 Insurance Corporation, Travelers Insurance Company, and CIGA [AP 23-04028, Docket No. 188] (joined
7 by United States Fire Insurance Company [AP 23-04028, Docket No. 189]); and (2) LMI. In response to
8 these motions, Foley researched the law relating to withdrawal of the reference, strategized regarding
9 options for responding and advised the client regarding the same, communicated with both counsel for the
10 Insurers and counsel for the Committee regarding the motions to withdraw, and ultimately, in order to
11 minimize cost and delay in prosecuting the Insurance Coverage Litigation, prepared and filed statements
12 of non-opposition. In connection with the motions to withdraw the reference, and the resulting District
13 Court matters, Foley (i) prepared and filed notices of appearance and motions for *pro hac vice* admission;
14 (ii) prepared the initial draft of a joint case management statement for the April 18, 2024 initial case
15 management conference in District Court; (iii) communicated with counsel for the Committee and for the
16 Insurer defendants in order to finalize the joint statement; (iv) finalized and filed the joint statement; (v)
17 prepared for and attended the initial case management conference; (vi) met and conferred with Insurer
18 counsel regarding initial Rule 26 disclosures; and (vii) prepared the Debtor's initial disclosures.

19 Foley also continued to work on issues related to the tender of claims to carriers, in order to
20 preserve coverage. Foley continued to review claims, analyze policies, review coverage, and identify
21 carriers providing coverage for each claim. This work also included reviewing and analyzing response
22 letters from various carriers. In order to track coverage for claims and insurer positions, Foley prepared
23 and maintained a detailed matrix of coverage and insurer positions. The majority of this work was
24 performed by special counsel and associates at Foley with lower billing rates than partners, in order to
25 minimize cost to the estate, with supervision from Foley's highly experienced insurance partner leading
26 coverage matters (Eileen Ridley).

1 This task code also reflects other insurance-coverage-related work by Foley during the Interim Fee
2 Period, including (i) ongoing communications with the Debtor's leadership regarding coverage issues and
3 strategy and the Insurance Coverage Litigation; (ii) analyzing related decisions in other diocese cases; (iii)
4 addressing issues regarding scheduling of hearings and briefings, especially in light of the motions to
5 withdraw the reference; (iv) procedural and logistical coordinating with the Debtor's separate counsel in
6 the second insurance adversary proceeding (Breall & Breall); (v) extensive work in connection with
7 production of documents to the Insurers, including insuring protection of confidentiality in compliance
8 with the Bar Date Order in connection with the same; and (vi) researching and drafting a motion for
9 summary judgment regarding claims by certain Insurers that the Clergy III settlements released coverage
10 for current claims.

11 **Y. Rule 2004 Motions/Discovery/Subpoenas (032)**

12 **Total Hours 186.50/Total Fees \$109,260.50**

13 During the Interim Fee Period, Foley's work related primarily to (i) responding to the Committee's
14 requests for information and documents and producing responsive documents; (ii) addressing issues
15 regarding the Confidentiality Order to govern discovery among the Debtor and Insurers; (iii) production
16 of documents to the Insurers; and (iv) addressing matters regarding the Committee's Rule 2004
17 examination of Insurers, including the Competing Discovery Motions filed by the Committee and various
18 Insurers regarding production of reserves information.

19 The Committee, through its professionals, made more than 180 separate requests for the production
20 of documents and information by the Debtor. Much of the work done by Foley during the Interim Fee
21 Period was in connection with the Committee's requests. In cooperation with the Committee, and in
22 furtherance of mediation, the Debtor, with the help of Foley and its other professionals, has been diligent
23 in responding to the Committee's requests, and has produced tens of thousands of documents. Foley's
24 work during the Interim Fee Period has included continuing to work with the Debtor, A&M and VeraCruz
25 to identify and gather responsive documents, reviewing the documents for confidentiality and privilege,
26 and preparing multiple productions. In addition, Foley has been in regular communication with the
27 Committee's counsel and financial advisors regarding the Committee's requests, prioritization of
28

1 particular information and other issues connected to the document production. Foley has also coordinated
2 with the Committee and counsel for Non-Debtor Catholic Entities regarding the Committee's requests for
3 information related to the Non-Debtor Catholic Entities.

4 Although the Debtor and Committee were able to reach agreement on a form of confidentiality
5 and protective order in July 2023, the Insurers refused to agree to the same form of order, and the ongoing
6 efforts to reach agreement with the Insurers on a form of confidentiality order carried over into the Interim
7 Fee Period. Foley continued to work diligently to resolve these issues with the Insurers, while preserving
8 essential protections for confidential information. Ultimately, the Court resolved the remaining disputes
9 and entered the final Confidentiality Order on January 30, 2024, governing discovery in both the
10 Bankruptcy Case and the Insurance Coverage Litigation.

11 In order to manage the document production process as efficiently as possible given the large
12 amount of information sought, as to both the Committee requests and the Insurer discovery, Foley has
13 continued to concentrate responsibility for this work largely with one partner (Matt Lee), one senior
14 counsel (Robert Stewart), and one paralegal (Kerry Farrar) and litigation support professionals, adding
15 other attorneys as appropriate and efficient.

16 Finally, Foley has continued to address matters related to the Committee's Rule 2004 discovery
17 directed toward Insurers, as described in the case status section above. In order to minimize expense to
18 the estate, the Debtor has largely deferred to the Committee with regard to this discovery. The information
19 sought is, however, also significant to the Debtor in connection with its valuable insurance coverage assets,
20 and Foley has necessarily had to address numerous issues related to these discovery disputes. This has
21 included review of LMI's appeal of the Court's 2004 Order and ongoing monitoring of the District Court
22 appeal; reviewing the Competing Discovery Motions; communications with Committee counsel regarding
23 the Competing Discovery Motions; and researching and analyzing the discoverability of insurance
24 reserves information and other contested documents.

1 **Z. Other Motion Practice (034)**

2 **Total Hours 12.80/Total Fees \$8,372.00**

3 During the Interim Fee Period, Foley’s work in this task code primarily related to preparing and
4 filing a motion to extend the deadline for removal of state court actions, along with supporting papers.
5 The Court entered an order granting the motion on February 2, 2024, extending the removal deadline
6 through August 5, 2024. Foley also incurred a small amount of time reflected in this task code in
7 coordinating with Committee counsel regarding the Committee’s request that the February 7, 2024,
8 hearing be Zoom-only.

9 **AA. General Counsel Matters (035)**

10 **Total Hours 5.30/Total Fees \$6,035.00**

11 The Debtor does not have an in-house attorney or general counsel. Rather, Foley serves as outside
12 general counsel for the Debtor and has done so for over a decade, resulting in the efficient delivery of
13 legal services to the Debtor to address a number of day-to-day operational issues. During the Interim Fee
14 Period, Foley, among other things, (i) addressed various tax matters; (ii) assisted the Debtor in connection
15 with issues related to a public defender request for a priest file, and investigation of an accused employee;
16 and (iii) analyzed corporate governance issues.

17 **BB. Mediation (038)**

18 **Total Hours 669.80/Total Fees \$611,551.50**

19 From the beginning of this Bankruptcy Case, the Debtor has consistently been committed to
20 achieving a confirmed plan of reorganization, by reaching agreement with the Committee for a consensual
21 plan of reorganization. The Debtor has also expressed its hope for a consensual resolution with at least
22 some of its Insurers. To that end, the Debtor’s focus during the Interim Fee Period was on mediation, and
23 correspondingly Foley spent much of its efforts during the Interim Fee Period in furtherance of it.

24 Before the Interim Fee Period, on December 19, 2023, the Debtor and Committee filed the Joint
25 Mediation Motion. During the Interim Fee Period, Foley continued to work on issues related to the Joint
26 Mediation Motion and selection of mediators, including coordinating with the proposed Committee
27 mediators on filing of updated declarations from their associates; strategizing regarding Insurer objections
28

1 to the Joint Mediation Motion and counseling the client regarding the same; responding to Insurer
2 arguments regarding the adequacy of disclosures by the Debtor and the Committee’s proposed mediators;
3 drafting and revising a reply brief to the Insurers’ objections to the Joint Mediation Motion; negotiating
4 with counsel for various Insurers and the Committee regarding the Mediation Order and selection of
5 mediators; evaluating the Insurers’ proposed mediators; preparing multiple revisions to the proposed
6 Mediation Order to address agreements with the Insurers and Committee; preparing for multiple hearings
7 on the Joint Mediation Motion; and analyzing and summarizing the Mediation Order entered by the Court.

8 The Debtor’s first meeting with the mediators for issues between the Debtor and Committee,
9 Jeffrey Krivis and Judge Sontchi (the “Committee Mediators”), was on January 31, 2024. Prior to this
10 meeting, Foley, the Debtor’s leadership, and A&M engaged in extensive preparation work to maximize
11 the chances of an ultimately successful result. Foley’s work in preparation included extensive analysis of
12 strategy for the mediation and preparation of memoranda and communications to the Debtor’s leadership
13 regarding the same; work with A&M regarding claims analysis and issues for mediation purposes; calls
14 and emails with the Committee Mediators prior to the meeting; and numerous meetings, calls, and emails
15 with the Debtor’s leadership and A&M regarding preparations and strategy.

16 Although the Insurers were not prepared to start mediation as quickly as the Committee, and
17 mediation with the Insurers was impacted by the Insurers’ approach to the Insurance Coverage Litigation,
18 Foley also worked during the Interim Fee Period to advance mediation with the Insurers. Foley
19 participated in an initial meeting with Judge Newsome and Timothy Gallagher (the “Insurance
20 Mediators”) on March 13, 2024. Based on recent developments, certain of the Insurers will send their
21 counsel to the upcoming mediation session on June 18, 2024.

22 The first joint mediation session with the Debtor and the Committee occurred on February 27.
23 Further mediation sessions during the Interim Fee Period were held on March 18 and 19, and April 15 and
24 16. In connection with these mediation sessions, as well as in preparation for further mediation sessions
25 in May, June, and through the summer, Foley engaged in extensive preparation, analysis, and strategy
26 with the Debtor and its other professionals, particularly A&M. This included work analyzing and
27 developing mediation strategy; numerous calls, meetings, and emails with client leadership regarding
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1 privileged strategy matters; preparation of memoranda to the Debtor's management regarding mediation
2 action items and strategy; communications with the mediators between mediation sessions to provide
3 information and discuss matters to be addressed in mediation sessions; preparing presentations on various
4 relevant mediation issues, subject to mediation privilege for the mediators and Committee; extensive
5 review and analysis of claims data and expert analysis relevant to mediation; analysis of settlements in
6 other diocesan and similar cases to inform mediation strategy; analyzing certain insurance issues;
7 evaluation of assets relevant to mediation; analysis of issues relating to property of the estate; analysis of
8 issues related to Non-Debtor Catholic Entities; gathering and synthesizing other information requested by
9 the mediators in support of mediation; review and analysis of the Committee's initial term sheet; analyzing
10 and strategizing regarding subsequent proposals on various issues; and communications with Committee
11 counsel regarding mediation.

12 **IV. REIMBURSEMENT OF EXPENSES**

13 **A. List of Expenses by Category**

14 Foley advanced costs, including certain in-house charges, in connection with the performance of
15 the services described in this Interim Application. During the Interim Fee Period, Foley incurred and billed
16 the Debtor a total of \$28,809.16 in expenses. As this modest amount reflects, Foley made every effort to
17 keep the costs in this case to a minimum. Additionally, as noted above, Foley agreed that it would not
18 charge the Debtor for any travel expenses for its attorneys to travel to the Bay Area, including airfare,
19 meals, and hotels. During the Interim Fee Period, Foley wrote off the sum of \$49,260.05 for such travel
20 expenses. Foley absorbed these costs itself. A summary chart detailing the type and amount of expenses
21 incurred during the Interim Fee Period is attached hereto as **Exhibit E**.

22 Foley does not charge for photocopying expenses, print jobs, or scanned copies. However, it might
23 sometimes be necessary for Foley to send large copying projects to an outside copy service that charges a
24 reduced rate for photocopying. Foley also hosts a litigation support platform for the Debtor in relation to
25 the previously-filed state court abuse litigation which is being utilized in this case also. Charges for hosting
26 that platform are included in this application.

INQUIRY	STATEMENTS
<p>If the fee application includes any rate increases since retention:</p> <ul style="list-style-type: none"> i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458? 	<p>Foley's rates as billed during the Interim Fee Period reflect routine annual billing rate increases for its professionals, effective as of February 1, 2024. Foley's engagement agreement with the Debtor reflects that Foley's rates adjust annually on February 1st, and the Debtor agreed to these terms.</p>

VI. BASIS FOR ALLOWANCE OF FEES AND EXPENSES

The fees and expenses requested by this Interim Application reflect reasonable compensation for services provided, and reimbursement of necessary expenses incurred, by Foley in acting as general bankruptcy counsel to the Debtor during the Interim Fee Period.

A. The Standard for Allowance of Compensation Pursuant to Section 330(a)

Pursuant to Section 330(a) of the Bankruptcy Code, the Court may award to a professional person reasonable compensation for actual, necessary services rendered, and reimbursement for actual, necessary expenses incurred. Pursuant to Section 331 of the Bankruptcy Code, the Court may award interim compensation and reimbursement to a professional. As set forth above, the fees for which the Firm requests compensation and the costs incurred for which the Firm requests reimbursement are for actual and necessary services rendered and costs incurred.

Section 330(a)(3) provides that in evaluating reasonable compensation, the court should consider the nature, extent, and value of the services provided, taking into account all relevant factors, including, (a) the time spent in providing such services; (b) the rates charged; (c) whether the services were necessary or beneficial to the estate at the time; (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the matter addressed; (e) whether the professional is certified or otherwise has demonstrated skill and experience in the bankruptcy field; and (f) whether the compensation sought is reasonable based on amounts charged by comparably skilled practitioners in non-bankruptcy cases. *See* 11 U.S.C. § 330(a)(3).

1 In determining the amount of allowable fees under Section 330(a) of the Bankruptcy Code, courts
2 are to be guided by the same “general principles” as are to be applied in determining awards under the
3 federal fee-shifting statutes, with “some accommodation to the peculiarities of bankruptcy matters.”
4 *Burgess v. Klenske (In re Manoa Finance Co., Inc.)*, 853 F. 2d 687, 691 (9th Cir. 1988). When
5 determining the amount of reasonable compensation to be awarded, the court shall consider the nature,
6 extent and value of such services, taking into account all relevant factors, including the factors set forth in
7 Section 330(a)(3).

8 In assessing the propriety of an award of attorneys’ fees, twelve factors relevant to determining
9 such fees were identified in *Johnson v. Georgia Highway Express, Inc.*, 488 F. 2d 714, 717-719 (5th Cir.
10 1974), a Title VII class action case under the Civil Rights Act of 1964, 42 U. S. C. § 2000 et seq., and
11 *Kerr v. Screen Extras Guild, Inc.*, 526 F. 2d 67, 70 (9th Cir. 1975), *cert. denied*, 425 U. S. 951 (1976): (1)
12 the time and labor required, (2) the novelty and difficulty of the questions, (3) the skill requisite to perform
13 the service properly, (4) the preclusion of other employment by the professional due to acceptance of the
14 case, (5) the customary fee, (6) whether fee is fixed or contingent, (7) time limitations imposed by the
15 client or the circumstances, (8) the amount involved and the results obtained, (9) the experience,
16 reputation, and ability of the professionals, (10) the undesirability of the case, (11) the nature and length
17 of the professional relationship with the client, and (12) awards in similar cases. *See American Benefit*
18 *Life Ins. Co. v. Baddock (In re First Colonial Corp. of America)*, 544 F.2d 1291 (5th Cir. 1977) (*Johnson*
19 *criteria applicable in bankruptcy cases*).

20 **B. Foley’s Work as Described in this Interim Application Satisfies the Requirements of**
21 **Section 330, and the Request for Compensation Should Be Granted**

22 The time for which compensation is sought is detailed in the Firm’s invoices for the Interim Fee
23 Period annexed hereto as **Exhibit G**. Foley’s services and time expenditures are reasonable in light of the
24 labor required and outcome achieved in these cases. The Firm’s charges for its professional services are
25 based upon the time, nature, extent, and value of such services and the cost of comparable services in the
26 San Francisco area, other than in a case under the Bankruptcy Code. The compensation the Firm seeks by
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28

1 way of this Interim Application is the customary compensation commonly sought by the Firm and other
2 professionals representing trustees, committees, and debtors in similar circumstances.

3 Foley believes the facts and complex nature of this case and the substantial progress that has
4 occurred to date, as set forth in detail above, demonstrate that Foley's services were both necessary and
5 beneficial to the estate. Further, Foley believes its attorneys are skilled and have performed well in this
6 case, and that the fees charged by Foley are commensurate with the fees charged by Foley's counterparts
7 engaged in non-bankruptcy specialties of the law.

8 Though Foley has utilized some professionals for less than 15 hours during the Interim Fee Period,
9 Foley represents that the use of these professionals was efficient and appropriate under the circumstances
10 because of their expertise needed for discrete issues.²⁰ These professionals often have particular expertise
11 which Foley's bankruptcy attorneys can call upon to review matters quickly without the need for
12 additional research and cost, and their fees should be approved.

13 **C. The Estate Has Sufficient Available Funds**

14 Foley understands that the Debtor has sufficient funds available for the payment of fees and costs
15 requested herein.

16 **VII. CONCLUSION**

17 Foley believes that the services rendered for which compensation is sought in this Interim
18 Application have been beneficial to the estate, that the costs incurred have been necessary and proper, and
19 that the sums requested for the services rendered and the costs incurred are fair and reasonable.

20 WHEREFORE, Foley respectfully requests that the Court (a) authorize interim allowance and
21 direct payment of fees and costs, (b) award interim compensation and reimbursement of expenses to the
22 Firm in the amount of **\$2,038,891.66** inclusive of all fees and costs for the period from January 1, 2024
23 through April 30, 2024, consisting of **\$2,010,082.50** of fees (reflecting the reduction for certain *de minimis*
24

25 ²⁰ Foley & Lardner LLP is not requesting payment of fees related to four timekeepers due to *de minimis* amounts
26 billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$2,022.00 related to said
27 timekeepers. However, Foley requests payment of fees for the remaining timekeepers who billed fewer than 15
28 hours during this period, because their expertise is unique and necessary for certain discrete issues in the case (*e.g.*,
trusts and estates, real estate, corporate governance, insurance, and bankruptcy matters), including several
timekeepers who have spent significant time on this case since its filing in May 2023.

1 billings), and **\$28,809.16** of expenses, and (c) grant such other and further relief as may be appropriate
2 under the circumstances.

3
4 DATED: June 14, 2024

FOLEY & LARDNER LLP

Jeffrey R. Blease
Thomas F. Carlucci
Shane J. Moses
Emil P. Khatchatourian
Ann Marie Uetz
Matthew D. Lee

8 /s/ Shane J. Moses

SHANE J. MOSES

9
10 *Counsel for the Debtor
and Debtor in Possession*

EXHIBIT A

FOLEY RETENTION ORDER



FOLEY & LARDNER LLP

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Matthew D. Lee (admitted *pro hac vice*)

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555 California Street, Suite 1700

San Francisco, CA 94104-1520

The following constitutes the order of the Court.

Signed: June 15, 2023

William J. Lafferty, III
U.S. Bankruptcy Judge

*Proposed Counsel for the Debtor
and Debtor in Possession*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

**ORDER APPROVING DEBTOR'S
APPLICATION TO EMPLOY FOLEY &
LARDNER LLP AS GENERAL
BANKRUPTCY COUNSEL PURSUANT TO
11 U.S.C. §§ 327(A), 330, 331 & 1107, AND
RULES 2014 & 2016 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE**

Upon the application (the "Application")¹ filed by The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or the "Bankruptcy Case"), pursuant to sections 327(a), 330, 331, and 1107 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016, for entry of an order authorizing the employment and retention of Foley & Lardner LLP ("Foley") to represent the Debtor as general bankruptcy counsel in the above-captioned case, on the terms described in the Application and as more fully set forth therein; and upon the Declaration of Ann Marie Uetz (the "Uetz

¹ Capitalized terms not defined herein shall have the meanings

1 Declaration”) and all other submissions filed in support of the Application; and due and proper notice of
2 the Application having been given; and the Court having found that it has jurisdiction over this matter
3 under 28 U.S.C. §§ 157 and 1334, that this is a core proceeding under 28 U.S.C. §§ 157(a)-(b) and
4 1334(b), and that venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409; and the Court
5 being satisfied based on the representations made in the Application and the Uetz Declaration that Foley
6 does not hold or represent any interest adverse to the Debtor’s estate in the above-captioned case and is
7 disinterested under section 101(14) and meets the requirements for employment under section 327(a) of
8 the Bankruptcy Code; and the Court finding that cause exists for the entry of this Order, and for authorizing
9 the employment of Foley & Lardner LLP as counsel for the Debtor effective as of the Petition Date,
10 including that such employment as of the Petition Date is in the best interests of the Debtor’s estate;

11 **IT IS HEREBY ORDERED** that:

- 12 1. The Application is APPROVED as set forth in this Order.
- 13 2. The Debtor is authorized to retain and employ Foley as its general bankruptcy counsel in
14 this case, effective as of the Petition Date, under the terms set forth in the Application.
- 15 3. Foley’s compensation and reimbursement in respect to its fees and expenses incurred
16 representing the Debtor shall be subject to further order of the Court in accordance with the procedures
17 and standards set forth in sections 330 and 331 of the Bankruptcy Code, such Federal Rules of Bankruptcy
18 Procedure and local rules as may be applicable from time to time, and such procedures as may be fixed
19 by order of this Court, as well as the *United States Bankruptcy Court Northern District of California*
20 *Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees, effective*
21 *February 19, 2014*, and the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and*
22 *Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases,*
23 *effective November 1, 2013.*
- 24 4. Notwithstanding anything to the contrary in this Order, or the Application, the Court is not
25 approving terms and conditions of Foley’s employment under 11 U.S.C. § 328(a).
- 26 5. In the event of any inconsistency between the Application and this Order, this Order shall
27 govern.

1 6. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be
2 immediately effective and enforceable immediately upon its entry.

3 7. The Debtor is authorized and empowered to take all action necessary to effectuate the relief
4 granted in this Order.

5 8. This Court shall retain jurisdiction with respect to all matters arising from or related to the
6 implementation, interpretation, or enforcement of this Order.

7 **APPROVED AS TO FORM:**

8 OFFICE OF THE UNITED STATES TRUSTEE

9
10 By: /s/ Jason Blumberg
11 Jason Blumberg
12 Trial Attorney

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*** END OF ORDER ***

COURT SERVICE LIST

All ECF Recipients.

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EXHIBIT B

CUSTOMARY AND COMPARABLE DISCLOSURES WITH FEE APPLICATIONS

(SEE GUIDELINES C.3 FOR DEFINITION OF TERMS USED IN THIS EXHIBIT.)

Category of Timekeeper	Blended Hourly Rate ²¹	
	BILLED Firm for preceding year, excluding bankruptcy	BILLED In the Interim Fee Period ²²
Partner ²³	\$839	\$901.29
Associate ²⁴	\$516	\$594.71
Paralegal	\$287	\$345.12
All timekeepers aggregated	\$611	\$742.91

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Foley & Lardner LLP
Date of Application:	June 14, 2024
Interim or Final:	Interim

²¹ These amounts include timekeepers whose *de minimis* time has been written off in this Interim Application.

²² Foley's annual fee increase occurred on February 1, 2024, and such increased rates are included herein.

²³ Partner category includes Of Counsel.

²⁴ Associate category includes Senior Counsel and Special Counsel.

EXHIBIT C

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

Name of Professional Individual²⁵	Initials	Department, Group or Section	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate (January 2024)	Hourly Billing Rate (From February 1, 2024)	Total Hours Billed	Total Compensation
Dania Abbasi	DAAB	Energy Litigation	Associate, 2019	\$500	\$630	121.00	\$72,850.00
Elizabeth P. Mazzocco	EPM	Insurance Litigation	Associate, 2014	N/A	\$750	3.40	\$2,550.00
Emmaline S. Jurgena	ESJ	Tax, Benefits & Estate Planning	Associate, 2019	N/A	\$630	6.50	\$4,095.00
Jose A. Lazaro	JAL	Transactions	Associate, 2020	N/A	\$600	9.90	\$5,940.00
Joseph S. Harper	JSH	Bankruptcy	Associate, 2016	\$615	\$700	37.50	\$25,485.00
Kirsten R. Dedrickson	KRD	Litigation	Associate, 2018	\$590	\$685	32.80	\$22,468.00
Mary Rofaeil	MRL	Bankruptcy	Associate, 2021	\$470	\$570	209.50	\$111,035.00
Mason Roberts	MR	Litigation	Associate, 2018	\$565	\$690	63.00	\$38,382.50
Mikaela R. Mitcham	MRM	Litigation	Associate, 2021	\$470	\$570	32.30	\$16,181.00
Nora J. McGuffey	NMCG	Bankruptcy	Associate, 2020	\$470	N/A	3.30	\$1,551.00
Stephanie McPhail*	SMP	Litigation	Associate, 2019	\$505	\$630	1.40	\$882.00
Shane J. Moses	SJM	Bankruptcy	Of Counsel, 2005	\$700	\$750	174.80	\$128,570.00
Angela A. Henes*	AAAM	Research	Other, N/A	\$215	\$240	0.30	\$72.00
Janelle C. Harrison	JCH	Bankruptcy	Paralegal, N/A	\$275	\$300	123.60	\$36,325.00
Kerry A. Farrar	KAFA	Litigation	Paralegal, N/A	\$375	\$395	157.30	\$60,497.50
Adam J. Hepworth*	AJHE	Health Care	Partner, 2013	N/A	\$775	0.20	\$155.00
Ann Marie Uetz	AMUE	Bankruptcy	Partner, 1993	\$850	\$925	369.20	\$335,097.50
Benjamin J. Morris	BJMO	Litigation	Partner, 2008	\$750	N/A	2.30	\$1,725.00
Eileen R. Ridley	EPK	Litigation	Partner, 1990	\$875	\$975	110.50	\$103,607.50

²⁵ “*” Denotes an individual who billed fewer than 15 hours and whose time has been written off in the discount listed below.

Name of Professional Individual ²⁵	Initials	Department, Group or Section	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate (January 2024)	Hourly Billing Rate (From February 1, 2024)	Total Hours Billed	Total Compensation
Emil P. Khatchaturian	ERR	Bankruptcy	Partner, 2009	\$725	\$800	181.20	\$140,842.50
Jason J. Kohout	JJK	Tax, Benefits & Estate Planning	Partner, 2007	\$775	\$875	3.30	\$2,887.50
Jeffrey R. Blease	JPWI	Litigation	Partner, 1988	\$1,150	\$1,275	188.30	\$230,707.50
Jonathan P. Witt	JRBL	Transactions	Partner, 2009	\$725	\$800	6.90	\$5,190.00
Lisa F. Glahn	LFG	Litigation	Partner, 2000	\$1,000	\$1,100	32.10	\$33,840.00
Mark C. Moore	MCM	Bankruptcy	Partner, 2010	\$700	\$825	227.80	\$180,460.00
Mark T. Schieble	MTSC	Tax, Benefits & Estate Planning	Partner, 1980	\$1,050	N/A	2.60	\$2,730.00
Matthew D. Lee	MDL	Bankruptcy	Partner, 2006	\$675	\$800	230.70	\$175,872.50
Thomas F. Carlucci	TFCA	Litigation	Partner, 1987	\$1,200	\$1,325	69.90	\$88,155.00
Alan R. Ouellette	AROU	Litigation	Senior Counsel, 2010	\$750	\$800	16.00	\$12,070.00
Matthew S. Kiel	MSK	Transactions	Senior Counsel, 2014	\$685	\$775	7.50	\$5,812.50
Robert T. Stewart	RTST	Litigation	Senior Counsel, 2014	\$655	\$740	37.70	\$27,898.00
Daniyal M. Habib	DMH	Litigation	Special Counsel, 2017	\$450	\$475	151.90	\$70,802.50
Tamar N. Dolcourt	TND	Bankruptcy	Special Counsel, 2009	\$675	\$735	91.50	\$66,454.50
Kevin T. Lewman*	KTLE	Technology	Technical Specialist/ N/A	\$400	\$415	2.20	\$913.00
SUBTOTAL						2,708.40	\$2,012,104.50
REDUCTION FOR DE MINIMIS TIMEKEEPERS							\$2,022.00
TOTAL							\$2,010,082.50

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-bk-40523
Applicant's Name: Foley & Lardner LLP
Date of Application: June 14, 2024
Interim or Final: Interim

EXHIBIT D

SUMMARY OF COMPENSATION REQUESTED BY CATEGORY

(SEE GUIDELINES ¶ C.8 FOR PROJECT CATEGORY INFORMATION)

Category	Hours Billed This Fee Period	Total Amount This Fee Period
003 – Automatic Stay	27.60	\$21,236.50
004 – Bankruptcy Litigation/Adversary Proceedings	28.20	\$20,808.50
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues	170.20	\$105,437.50
006 – Case Administration (Docket Updates, WIP and calendar)	98.20	\$42,463.00
007 – Chapter 11 Plan/Plan Confirmation	120.30	\$92,523.00
008 – Communications with Client	76.30	\$67,969.00
009 – Corporate Governance and Board Issues	52.00	\$38,508.00
010 – Vendor Issues	0.60	\$480.00
011 – Cash Management	20.60	\$15,650.00
013 – Employee Issues	1.30	\$868.00
014 – Exclusivity	13.90	\$9,680.00
015 – Executory Contracts/Lease Issues	19.00	\$13,195.00
016 – General Case Strategy (includes calls with client and team calls)	184.00	\$149,047.00
017 – Hearings and Courts Matters	68.10	\$55,535.00
018 – Non-Bankruptcy Litigation	8.50	\$6,915.50
020 – Retention/Billing/Fee Applications for Debtor Professionals	128.20	\$86,261.50
021 – Retention/Fee Applications: Ordinary Course Professionals	29.70	\$21,459.50
022 – Retention/Fee Applications: Other Professionals	13.10	\$7,884.50
025 – U.S. Trustee Issues/Meetings/Communications/Monthly Operating Report	31.20	\$23,740.00
026 – Unsecured Creditors Issues/Communications/Meetings	18.80	\$15,997.50
027 – Real Estate and Real Property Issues	37.70	\$33,701.50
028 – Tort Claims	33.60	\$28,818.50
029 – Non-Tort Proofs of Claim	4.40	\$3,092.50
031 – Insurance Issues (coverage)	648.50	\$415,614.00
032 – Rule 2004 Motions/Discovery/Subpoenas	186.50	\$109,260.50
034 – Other Motion Practice	12.80	\$8,372.00
035 – General Counsel Matters	5.30	\$6,035.00
038 – Mediation	669.80	\$611,551.50
SUBTOTAL	2,708.40	\$2,012,104.50
REDUCTION FOR DE MINIMIS TIMEKEEPERS		\$2,022.00
TOTAL		\$2,010,082.50

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-bk-40523
Applicant's Name: Foley & Lardner LLP
Date of Application: June 14, 2024
Interim or Final: Interim

EXHIBIT E

SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY

(SEE GUIDELINES ¶ C.8 FOR PROJECT CATEGORY INFORMATION)

Costs/Expense	Amount Billed
Document Retrieval	\$88.00
Electronic Legal Research Services	\$10,768.39
LSS – eDiscovery Services	\$14,400.00
Meals	\$1,512.51
Other Fees	\$1,315.05
Recording / Filing Fees	\$661.30
Shipping Charges	\$63.91
TOTAL	\$28,809.16

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-bk-40523
Applicant's Name: Foley & Lardner LLP
Date of Application: June 14, 2024
Interim or Final: Interim

EXHIBIT F

FOLEY BUDGET AND STAFFING PLAN

The Foley attorneys and paraprofessionals staffed on this case, subject to modification depending on further development, are set forth in (1) the Declaration of Ann Marie Uetz in Support of Debtor's Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. 327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure, and (2) supplemented as set forth in Exhibit C of this Interim Application, and the Debtor has approved that staffing. Before the Petition Date, Foley estimated the approximate cost per month of its services and expenses for the first 12 months of the Bankruptcy Case with certain months being higher and certain months being lower in amount, and also provided an estimate for all services and expenses in the case assuming a certain duration for the case, and the Debtor has approved that estimate. The fees sought in this Interim Application do not exceed the budget by 10% or more.

EXHIBIT G

FOLEY INVOICES



FOLEY & LARDNER LLP
111 HUNTINGTON AVENUE
SUITE 2600
BOSTON, MASSACHUSETTS 02199-7610
TELEPHONE (617) 342-4000
FACSIMILE (617) 342-4001
WWW.FOLEY.COM

Paul B. Bongiovanni
Chief Financial Officer
Roman Catholic Bishop of Oakland
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: February 29, 2024
Invoice No.: 50793451
Our Ref. No.: 100845-0402

Services through January 31, 2024

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	\$600,398.50
Total Expenses:	\$8,686.40
Amount Due:	\$609,084.90

Please reference your invoice number 50793451 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of our invoice.

Federal Employer Number:
39-0473800

Professional Services Detail

003 Automatic Stay

01/17/24	EPK	Follow up on developments in the JCCP 5108 proceedings to assess potential impacts on the automatic stay (.1); correspond with A. Ouellette and S. Moses regarding same (.2); review joint case management statement for January 24, 2024 CMC (.1).	0.40	\$290.00
01/17/24	SJM	Email to plaintiff's counsel in state court action regarding request to stipulation to amendment of complaint.	0.30	\$210.00
01/18/24	EPK	Correspond with J. Blease and A. Uetz regarding automatic stay issue relating to Non-Debtor Catholic Entity and shared insurance (.3); evaluate whether action pending against Non-Debtor Catholic Entity implicates insurance policies that are property of the bankruptcy estate (.3); review order regarding case management issued in abuse case (.1); correspondence with J. Blease and P. Glaessner regarding abuse case stay issues (.2).	0.90	\$652.50
01/18/24	SJM	Telephone call with plaintiff's counsel in state court matter regarding request for stipulation to amend complaint (.2); tanalyze approach to request to stipulate and other state court stay issues (.8).	1.00	\$700.00
01/19/24	EPK	Prepare for (.1) and attend vonference call with J. Blease and P. Glaessner regarding abuse action's impact on stay issues (.8); post-call correspondence with J. Blease and P. Glaessner regarding stipulated add-on of same to the JCCP 5108 (.2); review stipulation to add on an Alameda County case to the JCCP 5108 (.1); review related correspondence with plaintiffs' counsel (.3).	1.50	\$1,087.50
01/19/24	EPK	Develop strategy relating to protection of the automatic stay as to insurance assets belonging to the estate.	0.70	\$507.50

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Foley & Lardner LLP

February 29, 2024

01/19/24	JRBL	Telephone conference with E. Khatchaturian and P. Glaessner regarding insurance coverage issues and stay matters.	0.80	\$920.00
01/21/24	EPK	Correspondence with plaintiff's counsel regarding addition of additional action to the JCCP 5108 coordinated proceeding.	0.20	\$145.00
01/22/24	EPK	Analyze stay issues that were raised in the Santa Rosa case (.1); address request for stipulated stay relief received from plaintiff's counsel (.1).	0.20	\$145.00
01/31/24	EPK	Analyze ostensible stay violations due to service of summonses from plaintiffs' firms (.4); review offending complaints and summonses (.3); confirm service of notice of stay on certain plaintiffs' firms (.2).	0.90	\$652.50
01/31/24	SJM	Analyze newly served complaints in state court actions (.2); review status of prior notices to plaintiffs' firms (.3); email to E. Khatchaturian and A. Ouellette regarding same (.2).	0.70	\$490.00
Task Total:			7.60	\$5,800.00

004 Bankruptcy Litigation/Adversary Proceedings

01/23/24	EPK	Evaluate bankruptcy issues raised by pending probate action involving potential trust distribution to the bankruptcy estate.	0.30	\$217.50
01/23/24	MDL	Evaluate demurrer papers filed by Bennett Trust.	0.20	\$135.00
01/24/24	EPK	Strategy calls with M. Lee regarding probate issue with the Edward Bennett Trust (.2); conference call with client, M. Lee and RCBO's probate counsel, R. Lund of the Plageman firm, regarding probate issues affecting receipt of distributions by parish church beneficiary of the Bennett Trust (1.1); review notices filed in the related probate action (.1).	1.40	\$1,015.00
01/24/24	MDL	Telephone conference with R. Lund and B. Wilson (both of Plageman firm), E. Khatchaturian, and P. Bongiovanni regarding Bennett Trust petition and jurisdictional question.	1.10	\$742.50

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01/25/24	EPK	Analyze issues and holdings relating to the "probate exception" to federal jurisdiction discussed in various Ninth Circuit cases (.4); correspond with outside probate counsel, B. Wilson of Plageman firm, regarding update on probate proceedings (.2).	0.60	\$435.00
01/25/24	NMCG	Analyze case law regarding bankruptcy court jurisdiction and the probate exception.	0.80	\$376.00
01/26/24	EPK	Develop arguments for potential turnover demand relating to trust distribution to the bankruptcy estate out of probate.	1.10	\$797.50
01/29/24	EPK	Evaluate scope of the "probate exception" to bankruptcy jurisdiction (.9); review pleadings filed in the Bennett Estate probate action (.4); revise turnover demand letter (.2).	1.50	\$1,087.50
01/30/24	EPK	Finish analyzing application of "probate exception" to the Bennett Trust distribution asset (.7); make corresponding revisions to the turnover demand letter to be sent to the Bennett Trust trustee (.2).	0.90	\$652.50
Task Total:			7.90	\$5,458.50

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

01/02/24	MCM	Prepare for claims-review meeting with A&M professionals on January 3, 2024, including email correspondence with Foley team members (.7); email correspondence with Committee counsel regarding tiering of claims from Committee experts (.3).	1.00	\$700.00
01/03/24	EPK	Assess impact of Franciscan Friars chapter 11 filing on the RCBO estate and claims involving the Friars.	0.20	\$145.00
01/03/24	KAFA	Analysis of A&M bucketing of proofs of claim.	0.90	\$337.50
01/03/24	MCM	Review email correspondence regarding claims tiering and related issues with Foley team and claims-review experts (.5); review prior analysis of potential exclusionary criteria and claims funnel for same (1.0).	1.50	\$1,050.00

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Foley & Lardner LLP

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01/04/24	EPK	Confer with M. Moore regarding claims analyses and related data sets (.3); review email from S. Levitt of A&M regarding abuse claims analysis (.1); correspond with M. McNamara of A&M regarding reconciliation of non-abuse claims (.2).	0.60	\$435.00
01/04/24	KAFA	Analysis of settlement data related to other diocese completed cases (.7); parish claim allocation analysis (1.3); analysis of master claims review spreadsheet (.8).	2.80	\$1,050.00
01/04/24	MCM	Analyze issues in connection with execution of confidentiality agreements by Gallagher parties to allow transmission of proofs of claim to same.	0.50	\$350.00
01/04/24	MCM	Continue working on analysis of exclusionary criteria and potential claim objections based on claims data following discussion with A&M claims-review experts.	1.40	\$980.00
01/05/24	KAFA	Analyze proofs of claim by parish.	6.00	\$2,250.00
01/05/24	MCM	Finalize executed confidentiality agreements from Gallagher and circulate to the Committee, Gallagher, and related parties to allow tender of claims.	0.50	\$350.00
01/05/24	MCM	Continue working on analysis of proofs of claim and potential exclusionary criteria and claim objections (1.5); email and telephone correspondence with K. Farrar regarding analysis of location data and related issues (.5).	2.00	\$1,400.00
01/07/24	JRBL	Analysis of tort claim data and valuation methodology in preparation for client call.	3.30	\$3,795.00
01/07/24	JRBL	Attend presentation from experts on claims.	1.00	\$1,150.00
01/07/24	TFCA	Telephone call with J. Blease regarding preparation for call with A&M (.3); telephone call with Foley team and experts regarding bucketing of claims (1.0).	1.30	\$1,560.00
01/08/24	JCH	Revise and file Joint Reply to Objections to Joint Motion to Mediate.	0.50	\$137.50
01/08/24	KAFA	Parish claim allocation analysis (3.3); claims review analysis with A&M (.4); internal claims analysis (.3).	4.00	\$1,500.00

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Foley & Lardner LLP

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01/08/24	MCM	Work on claims review, focusing on location information and reconciliation.	0.60	\$420.00
01/09/24	EPK	Review correspondence with P. Bongiovanni and A&M team regarding abuse claims reconciliation issues.	0.20	\$145.00
01/09/24	KAFA	Analyze proofs of claim by parish.	0.40	\$150.00
01/09/24	MDL	Strategize with A. Uetz regarding CNA demand for copies of proofs of claim.	0.30	\$202.50
01/09/24	MDL	Analyze points to raise in response to CNA demand for copies of proofs of claim.	0.90	\$607.50
01/10/24	KAFA	Analyze proofs of claim by parish.	4.70	\$1,762.50
01/10/24	MDL	Email correspondence with M. Kaplan (Lowenstein) regarding proposed order on insurer experts' access to proofs of claim.	0.10	\$67.50
01/11/24	EPK	Foley team correspondence regarding time-barred proofs of claim.	0.10	\$72.50
01/11/24	KAFA	Preparation of redacted filed proofs of claim.	0.40	\$150.00
01/11/24	MCM	Work on issues in connection with production of abuse claims to insurer subject to agreement with counsel for same regarding protection.	0.80	\$560.00
01/12/24	KAFA	Analysis of newly filed late proofs of claim.	0.60	\$225.00
01/12/24	MCM	Work on issues in connection with production of abuse claims to insurer subject to agreement with counsel for same regarding protection (1.0); email correspondence with counsel regarding same and orchestrating production (.4); conference call with A&M claims-review team regarding valuation methodology and related issues (.6).	2.00	\$1,400.00
01/12/24	MDL	Strategize regarding designation of confidentiality for proofs of claim to be produced to CNA attorneys in light of absence of protective order and in light of confidentiality agreements.	0.30	\$202.50
01/16/24	AMUE	Review email received from E. Tredinnick regarding approval of order on late-filed claims (.2); review revised order on late-filed claims (.2); respond to E. Tredinnick regarding order on late-filed claims (.1).	0.50	\$425.00

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Foley & Lardner LLP

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01/16/24	AMUE	Meeting with A&M (N. DeLuca and T. Raab) and Foley team (M. Lee, J. Blease and T. Carlucci) regarding claims analysis (1.0); prepare for meeting (.9).	1.90	\$1,615.00
01/16/24	JRBL	Telephone conference with experts regarding claim valuation.	1.00	\$1,150.00
01/16/24	MRL	Edit the memorandum on the claims analysis (.6); confer with M. Moore regarding the same (.2).	0.80	\$376.00
01/16/24	MRL	Confer with M. Moore regarding claims and current status of the case.	0.40	\$188.00
01/17/24	KAFA	Work on study of parish assignments and claims experience.	2.00	\$750.00
01/17/24	MCM	Analyze issues in connection with updated claims review by Foley claims-review team.	0.60	\$420.00
01/18/24	KAFA	Work on study of parish assignments and claims experience.	7.20	\$2,700.00
01/18/24	MCM	Work on location analysis of claims with K. Farrar and Foley litigation team.	0.80	\$560.00
01/19/24	KAFA	Work on study of parish assignments and claims experience.	4.70	\$1,762.50
01/19/24	MCM	Continue working on location analysis of claims with K. Farrar and Foley litigation team.	0.50	\$350.00
01/22/24	AMUE	Review claims analysis in preparation for client meeting to discuss same.	1.10	\$935.00
01/22/24	KAFA	Attend call with A&M claims expert N. DeLuca and M. Moore (.5); analysis of prior settlements (1.3).	1.80	\$675.00
01/22/24	KAFA	Work on study of parish assignments and claims experience.	1.80	\$675.00
01/22/24	MCM	Prepare for meeting with claims-review team at A&M regarding claims-valuation analysis (.4); follow-up work on non-bankruptcy settlements and related issues (.4).	0.80	\$560.00
01/22/24	MCM	Prepare for (0.5) and attend meeting with claims-review team at A&M and litigation team at Foley.	1.00	\$700.00
01/23/24	KAFA	Analysis of prior historical claim settlements.	0.60	\$225.00

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01/23/24	KAFA	Work on client-requested study of parish assignments and claims experience.	1.90	\$712.50
01/23/24	MCM	Work on issues in connection with pre-bankruptcy settlements in context of claims review and valuation.	0.50	\$350.00
01/24/24	AMUE	Meeting with L. Glahn to obtain information necessary to develop strategy concerning claim against active priest.	0.90	\$765.00
01/24/24	AMUE	Review claims analysis in preparation for client meeting.	0.80	\$680.00
01/24/24	JRBL	Telephone conference with A&M regarding preliminary valuation of claims.	0.70	\$805.00
01/24/24	KAFA	Work on client-requested study of parish assignments and claims experience.	1.80	\$675.00
01/24/24	MCM	Confer with M. Rofaeil regarding location analysis based on additional information from litigation sources and reconciliation of unknown information from proofs of claim (.2); email correspondence with Foley team regarding same (.3); prepare for meeting with claims-review team at A&M regarding valuation methodology (.6).	1.10	\$770.00
01/24/24	MRL	Confer with M. Moore regarding organizing the sexual abuse claims based on the parishes (.2); analyze the sexual abuse claims to organize the claims based on the abuse location regarding the parishes (5.5).	5.70	\$2,679.00
01/24/24	TFCA	Prepare for call with A&M regarding claims valuation (.3); attend call regarding same (.5); follow up with J. Blease regarding same (.2).	1.00	\$1,200.00
01/25/24	JRBL	Conference with A&M regarding claim valuation analysis.	0.50	\$575.00
01/25/24	JRBL	Analysis of valuation data and claims in preparation for client meeting.	3.30	\$3,795.00
01/25/24	KAFA	Analysis of prior historical RCBO settlements and Glaessner settlement agreements within the last 4 years (1.3); analysis of valuation data from M. Moore and A&M (.7); reconcile discrepancies/unknown information in claims analysis (2.3).	4.30	\$1,612.50

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01/25/24	MCM	Meeting with A&M claims-review team to discuss claims-valuation analysis and presentation of same.	1.00	\$700.00
01/25/24	MRL	Continue analyzing the sexual abuse claims to organize the claims based on the abuse location regarding the parishes (2.0); communication with the Foley team regarding the outcome of the claims (.3); email correspondence regarding the same (.3).	2.60	\$1,222.00
01/26/24	KAFA	Reconcile discrepancies/unknown information in claims analysis.	1.30	\$487.50
01/26/24	KAFA	Work on client-requested study of parish assignments and claims experience.	3.20	\$1,200.00
01/26/24	MRL	Finalize analyzing the sexual abuse claims to organize the claims based on the abuse location regarding the parishes (.6); email correspondence regarding the same (.2).	0.80	\$376.00
01/29/24	JRBL	Review new tort claims settlement data and analysis.	1.30	\$1,495.00
01/29/24	KAFA	Analysis of complaint served on client and comparison to late-filed POC for same claimant.	0.40	\$150.00
01/29/24	KAFA	Work on client-requested study of parish assignments and claims experience.	2.70	\$1,012.50
01/30/24	KAFA	Preparation of redacted filed proofs of claim for production to insurers.	1.00	\$375.00
01/30/24	KAFA	Analysis of newly filed POCs and updated claims register received from KCC (.6); reconcile discrepancies/unknown information in claims analysis (1.0).	1.60	\$600.00
01/30/24	MDL	Review claims categories and disallowance analysis.	0.30	\$202.50
01/30/24	MRL	Confer with M. Moore regarding updating the dates of the sexual abuse claims (.2); analyze the sexual abuse claims to organize the claims based on the date of the abuse (1.5).	1.70	\$799.00

01/31/24	MRL	Analyze the sexual abuse claims to organize the claims based on the date of the abuse.	1.10	\$517.00
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	Task Total:	107.90	\$60,977.00
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006 Case Administration (docket updates, WIP, and calendar)

01/01/24	MRL	Summarize daily docket activity and upcoming deadlines for team.	0.20	\$94.00
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01/02/24	EPK	Provide comments to master case calendar and key dates timeline to J. Harrison (.3); review updated master case calendar, key dates timeline, and new case dates/deadlines (.2).	0.50	\$362.50
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01/02/24	JCH	Revise Timeline and Master Case Calendar (.5); call with E. Khatchatourian regarding same (.2); calendar response deadlines to recently filed pleadings (.5); update docket report for December 23 through January 2 (.8).	2.00	\$550.00
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01/02/24	MRL	Summarize docket activity and circulate update to team (.2); review email from J. Harrison with RCBO docket update (.1).	0.30	\$141.00
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01/03/24	JCH	Update daily docket report.	0.50	\$137.50
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01/04/24	JCH	Update daily docket report for team.	0.50	\$137.50
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01/04/24	MRL	Summarize daily docket activity and upcoming deadlines for team.	0.20	\$94.00
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01/05/24	JCH	Prepare daily docket update.	0.50	\$137.50
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01/07/24	MRL	Summarize daily docket activity and upcoming deadlines for team (.4); review email from J. Harrison regarding RCBO docket update (.1).	0.50	\$235.00
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01/08/24	EPK	Comment on this week's update to the master case calendar and key dates timeline.	0.20	\$145.00
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01/08/24	JCH	Revise Timeline and Master Case Calendar (.5); circulate updated Timeline and Master Case Calendar (.2); finalize Notice of Core Service List as of January 8, 2024 (.5); update docket report (.5).	1.70	\$467.50
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01/08/24	MRL	Summarize daily docket activity and upcoming deadlines for team.	0.40	\$188.00
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01/10/24	JCH	Update daily docket report.	0.50	\$137.50
01/11/24	JCH	Update daily docket report.	0.50	\$137.50
01/12/24	EPK	Confer with J. Harrison regarding updates to docketed dates and deadlines.	0.10	\$72.50
01/12/24	JCH	Update daily docket report.	0.50	\$137.50
01/16/24	JCH	Update daily docket report.	0.50	\$137.50
01/17/24	JCH	Update daily docket report.	0.50	\$137.50
01/17/24	MRL	Summarize docket activity and circulate update to team.	0.30	\$141.00
01/18/24	EPK	Assess upcoming critical case dates and deadlines to evaluate impact on overall restructuring objectives.	0.20	\$145.00
01/18/24	JCH	Draft daily docket report.	0.50	\$137.50
01/19/24	JCH	Calendar deadlines for newly-filed pleadings (.2); update daily docket report (.5).	0.70	\$192.50
01/21/24	EPK	Review case calendar updates (.1); review internal task list (.1).	0.20	\$145.00
01/21/24	MRL	Summarize daily docket activity and upcoming deadlines for team.	0.40	\$188.00
01/22/24	EPK	Review updated master case calendar and key dates timeline (.1); provide comments on same to J. Harrison (.2).	0.30	\$217.50
01/22/24	JCH	Update Master Case Calendar and Timeline and circulate to group (.5); draft daily docket update (.5).	1.00	\$275.00
01/22/24	MRL	Summarize docket activity to update team.	0.40	\$188.00
01/22/24	MRM	Prepare email to case status update report for various diocesan proceedings.	1.30	\$611.00
01/23/24	JCH	Prepare daily docket report.	0.50	\$137.50
01/24/24	JCH	Update daily docket report.	0.50	\$137.50

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01/25/24	EPK	Review notice of non-opposition for pending removal-deadline extension motion (.1); confer with J. Harrison regarding timing for filing same (.1); review recently docketed case dates and deadlines (.1).	0.30	\$217.50
01/25/24	JCH	Update daily docket report.	0.50	\$137.50
01/25/24	MRL	Summarize daily docket activity and upcoming deadlines for team.	0.30	\$141.00
01/26/24	JCH	Calendar deadlines for recently-filed pleadings and hearing (.5); update daily docket report(.5).	1.00	\$275.00
01/29/24	EPK	Review this week's updated master case calendar (.1); provide comments to same to J. Harrison and J. Harper (.2).	0.30	\$217.50
01/29/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$275.00
01/29/24	MRL	Summarize docket activity for team.	0.60	\$282.00
01/30/24	JCH	Update daily docket report.	0.50	\$137.50
01/30/24	MDL	Provide instruction to S. Moses regarding terms of continuance of January 31 hearing to February 7.	0.30	\$202.50
01/31/24	JCH	Calendar continued hearing on February 7, 2023 (.2); update daily docket update report (.5).	0.70	\$192.50
		Task Total:	21.90	\$8,043.00

007 Chapter 11 Plan/ Plan Confirmation

01/01/24	MCM	Analyze filings in new Franciscan Friars bankruptcy case (.4); continue revisions to diocese/religious order survey based on analysis of religious-order bankruptcy cases following Franciscan Friars filing (1.6).	2.00	\$1,400.00
01/02/24	MCM	Finalize updated diocesan and religious-order bankruptcy survey chart to facilitate discussion with client parties regarding plan outcomes.	1.50	\$1,050.00
01/02/24	MRL	Revise research re: decisions in relevant diocese cases to inform RCBO strategy related to claims.	2.10	\$987.00
01/02/24	MRM	Conduct additional research concerning IVCP valuation protocols.	2.20	\$1,034.00

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01/03/24	MCM	Prepare for meeting with A&M team to discuss presentation for Steering Committee scheduled for January 9, 2024 (.7); meeting with A&M and Foley teams to prepare for Steering Committee presentation (1.0).	1.70	\$1,190.00
01/03/24	MCM	Work with M. Rofaail regarding important case rulings and other documentation based on client party requests (.5); review settlement and other information from other diocesan cases based on repositories of IRCP/IVCP and out-of-court settlements (1.4).	1.90	\$1,330.00
01/03/24	MRL	Review the Oakland docket to inform RCBO strategy related to claims.	0.80	\$376.00
01/03/24	MRM	Discuss findings concerning claims valuations with Foley team (.7); follow-up research concerning the same (3.0); call to discuss the same with Foley and A&M team (1.0).	4.70	\$2,209.00
01/04/24	MRL	Review documents in relevant diocese cases to inform RCBO strategy related to claims (3.1); circulate a draft email to the client to the Foley team (.2).	3.30	\$1,551.00
01/05/24	MCM	Prepare for Steering Committee meeting on January 9, 2024.	0.50	\$350.00
01/07/24	MCM	Prepare for Steering Committee meeting with A&M claims-review team (.5); conference call with Foley and A&M personnel to discuss presentation scheduled for Tuesday, January 9, 2024 (1.0); work on issues in connection with presentation and conclusions on claims review and potential objections (1.5).	3.00	\$2,100.00
01/08/24	MCM	Continue preparation for Steering Committee meeting on January 9, 2024 with Foley and A&M teams.	1.50	\$1,050.00
01/09/24	JRBL	Conference with A&M team and M. Moore to review and revise presentation to Steering Committee.	1.20	\$1,380.00

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01/09/24	MCM	Revise slide deck for Steering Committee meeting and circulate to A&M and Foley teams for review (.6); continue revisions to deck based on comments received (.4); walkthrough meeting with A&M team for final preparation for Steering Committee meeting (.7); attend Steering Committee meeting as part of bankruptcy team (1.5).	3.20	\$2,240.00
01/09/24	MDL	Participate in RCBO Steering Committee meeting.	1.50	\$1,012.50
01/09/24	TFCA	Attend Steering Committee call.	1.50	\$1,800.00
01/15/24	MCM	Prepare for Steering Committee presentation on claims on January 26, 2024 (.5); evaluate issues in connection with rulings from Portland diocese case on interplay of secular and canon law (.6); email correspondence with M. Lee and E. Khatchatourian regarding same (.4).	1.50	\$1,050.00
01/16/24	MCM	Conference call with claims-valuation experts in preparation for Steering Committee meeting on January 26, 2024.	0.50	\$350.00
01/17/24	MCM	Email correspondence regarding insurer objections to diocesan plans of reorganization and related issues (.3); follow up with M. Mitcham regarding necessary research (.3).	0.60	\$420.00
01/17/24	MRM	Research courts' interpretation of plans that are not insurance neutral.	1.30	\$611.00
01/18/24	MRM	Research courts' interpretation of plans that are not insurance neutral.	2.00	\$940.00
01/19/24	MCM	Email correspondence with A&M claims-review team regarding preparation for Steering Committee meeting and related issues (.3); work on claims-review issues prior to same (.5).	0.80	\$560.00
01/19/24	MRM	Conduct research of insurance neutral interpretation by courts (3.0); synthesize findings and provide write up (.8).	3.80	\$1,786.00
01/23/24	MCM	Prepare for Steering Committee meeting on January 26, 2024.	0.80	\$560.00
01/24/24	ERR	Create draft of Steering Committee presentation regarding insurance coverage issues.	3.20	\$2,800.00

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01/24/24	MCM	Meeting to prepare for Steering Committee presentation with A&M and litigation team.	1.00	\$700.00
01/25/24	AMUE	Prepare for SteerCo meeting by reviewing insurance and claims topics.	1.60	\$1,360.00
01/25/24	ERR	Revise Steering Committee presentation regarding insurance issues.	1.40	\$1,225.00
01/25/24	JCH	Prepare information regarding Disclosure Statements filed in 13 diocesan/religious order cases to distribute Foley team.	0.80	\$220.00
01/25/24	LFG	Coordinate with J. Blease and A. Uetz on preparation for Steering Committee meeting.	1.40	\$1,400.00
01/25/24	MCM	Conference call with Foley and A&M teams to prepare for Steering Committee meeting on January 26, 2024.	1.00	\$700.00
01/25/24	TFCA	Attend walk through regarding A&M slides with M. Moore to prepare for Steering Committee and leadership meetings.	1.00	\$1,200.00
01/26/24	AMUE	Prepare for meeting with SteerCo (1.3); meeting with SteerCo (1.5).	2.80	\$2,380.00
01/26/24	ERR	Prepare for RCBO Steering Committee meeting regarding insurance issues.	2.00	\$1,750.00
01/26/24	ERR	Attend Steering Committee meeting (1.5) and following strategy meeting with RCBO regarding insurance issues (4.5).	6.00	\$5,250.00
01/26/24	MCM	Prepare charts and related information for Steering Committee meeting on January 26, 2024.	1.00	\$700.00
01/26/24	TFCA	Meet with Steering Committee.	1.50	\$1,800.00
		Task Total:	68.60	\$48,821.50

008 Communications with Client

01/03/24	AMUE	Weekly meeting with C. Moore and P. Bongiovanni regarding strategy.	0.50	\$425.00
01/04/24	AMUE	Weekly check-in meeting with Foley-A&M-client teams to discuss strategy.	0.50	\$425.00

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01/04/24	EPK	Weekly client team update call to discuss case developments, strategy, and near-term tasks.	0.60	\$435.00
01/04/24	JRBL	Update call with client and Foley/A&M team.	0.50	\$575.00
01/04/24	LFG	Call with P. Bongiovanni and client team on next steps.	0.50	\$500.00
01/04/24	MCM	Communications and strategy meeting with client parties.	0.50	\$350.00
01/04/24	TFCA	Attend call with client and professionals.	0.50	\$600.00
01/05/24	AMUE	Finalize memorandum to client leadership team regarding important decisions in other chapter 11 diocese cases and their possible impact in RCBO.	0.80	\$680.00
01/05/24	MDL	Telephone conference with R. Medeiros regarding USCCB audit reporting.	0.10	\$67.50
01/08/24	JRBL	Telephone conference with P. Bongiovanni regarding engineering proposals and analysis.	0.80	\$920.00
01/08/24	SJM	Email to client regarding filings for hearing on January 9.	0.20	\$140.00
01/09/24	AMUE	Telephone conference with P. Bongiovanni to debrief from Court hearing.	0.90	\$765.00
01/11/24	AMUE	Telephone meeting with P. Bongiovanni regarding restricted gift issue.	0.20	\$170.00
01/11/24	AMUE	Meeting with client-Foley-A&M teams to discuss case strategy.	0.50	\$425.00
01/11/24	EPK	Weekly client and advisor teams coordination and strategy call.	0.50	\$362.50
01/11/24	ERR	Telephone conference with client representative regarding case status and issues regarding amended complaint and tender position.	0.50	\$437.50
01/11/24	JRBL	Meeting with client, Foley team and A&M team to discuss strategy.	0.50	\$575.00
01/11/24	MCM	Weekly strategy call with client parties regarding open items.	0.50	\$350.00
01/11/24	MCM	Communications call with client parties.	0.50	\$350.00
01/11/24	MDL	Participate in weekly client update and strategy call.	0.50	\$337.50

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01/11/24	TFCA	Attend call with client and professionals.	0.50	\$600.00
01/12/24	MDL	Correspondence with P. Bongiovanni regarding payments to be made following notice required by cash management order and following objection period for monthly fee statements.	0.20	\$135.00
01/15/24	MDL	Email exchange with P. Bongiovanni regarding further review of real estate assets.	0.10	\$67.50
01/17/24	EPK	Correspondence (.3) and call (.3) with R. Medeiros regarding restricted gifts relating to maintenance and upkeep.	0.60	\$435.00
01/18/24	EPK	Weekly client team and estate professionals call to discuss case developments, strategy, and action items.	0.80	\$580.00
01/18/24	JRBL	Weekly check-in call with client, Foley and A&M.	0.80	\$920.00
01/18/24	MDL	Correspondence with R. Medeiros and M. Ortega Smith regarding points of discussion for Minor Review Board meeting.	0.20	\$135.00
01/18/24	MDL	Participate in weekly call with P. Bongiovanni, A&M team, and VeraCruz team regarding case update and strategy discussion.	0.80	\$540.00
01/18/24	MDL	Telephone conference with R. Medeiros regarding 1/19 meeting with Minor Review Board.	0.20	\$135.00
01/19/24	JRBL	Telephone conference with P. Bongiovanni and S. Martinez regarding demolition of certain improvements.	0.50	\$575.00
01/19/24	MDL	Meeting with Minor Review Board regarding case update, claims totals, and mediation process.	0.90	\$607.50
01/22/24	AMUE	Finalize weekly update for client leadership team.	0.30	\$255.00
01/22/24	MDL	Telephone conference with M. Kemner regarding data requested from other diocesan bankruptcy cases.	0.10	\$67.50
01/22/24	MDL	Email exchange with L. Oberempt regarding updates to church bank account closures and openings.	0.30	\$202.50
01/22/24	MDL	Email exchange with P. Bongiovanni regarding RCC interest payment for January 2024.	0.10	\$67.50

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01/22/24	MDL	Email correspondence with M. Kemner regarding summaries of demographics and procedural and substantive histories of specific diocesan bankruptcy cases.	1.40	\$945.00
01/23/24	EPK	Conference call with P. Bongiovanni and advisor teams regarding diligence inquiries from BRG relating to OPF transfers.	0.70	\$507.50
01/23/24	ERR	Telephone call with P. Bongiovanni regarding insurance issues (dismissal) and consolidation with J. Breall.	0.50	\$437.50
01/25/24	AMUE	Prepare for (.2) and attend weekly client-Foley-A&M strategy meeting (.5).	0.70	\$595.00
01/25/24	EPK	Attend weekly client team and estate professionals call to discuss case developments, strategy, and action items.	0.60	\$435.00
01/25/24	ERR	Telephone conference with RCBO representatives regarding case status and strategy regarding insurance issues.	0.60	\$525.00
01/25/24	JRBL	Attend weekly client check-in call.	0.50	\$575.00
01/25/24	MCM	Attend strategy meeting with client parties, Foley team, and A&M.	0.50	\$350.00
01/25/24	MDL	Participate in regular weekly case update telephone conference with P. Bongiovanni, A&M and Foley teams, and VeraCruz team.	0.60	\$405.00
01/25/24	TFCA	Attend call with professionals and client.	0.50	\$600.00
01/29/24	EPK	Correspond with P. Bongiovanni regarding coordination with the Diocese of San Jose on CTN grants/contributions.	0.30	\$217.50
01/31/24	EPK	Email correspondence with P. Bongiovanni regarding asset analysis and case-reporting issues (.3); confer with M. Lee regarding same (.3); telephonic communications with P. Bongiovanni regarding CTN strategy (.2).	0.80	\$580.00
		Task Total:	24.20	\$20,385.00

009 Corporate Governance and Board Issues

01/05/24	AMUE	Draft comments to R. Medeiros regarding information to submit for audit (1.2); telephone call with R. Medeiros regarding audit (.3); review email from R. Medeiros regarding questions for audit (.3).	1.80	\$1,530.00
01/05/24	KAFA	Analysis of client questions related to Stonebridge audit data.	0.50	\$187.50
01/05/24	MDL	Evaluate data needed for USCCB audit reporting.	0.20	\$135.00
01/05/24	MTSC	Review Forms 928 for inclusion in Group Ruling.	0.40	\$420.00
01/08/24	MTSC	Review Form 928A for inclusion in group ruling.	0.30	\$315.00
01/09/24	MTSC	Review 928A for Franciscan entity and instructions from USCCB (1.5); prepare email to client re same (.4).	1.90	\$1,995.00
01/16/24	EPK	Update task and issues list regarding CTN asset and related governance issues.	0.20	\$145.00
01/30/24	EPK	Evaluate options to monetize CTN grants (1.1); review Foley's analysis of the CTN membership interest and gifts/contributions from CTN (.3); conference call with P. Bongiovanni, estate advisors, and the Diocese of San Jose regarding CTN revenue asset (1.0); post-call email correspondence with P. Bongiovanni regarding CTN issues (.2).	2.60	\$1,885.00
01/30/24	JPWI	Prepare for call regarding CTN (.3); participate on conference call with representatives from CTN and diocese of San Jose (1.0).	1.30	\$942.50
01/31/24	EPK	Email correspondence with J. Witt regarding corporate analysis of CTN membership interest (.2); review streamlined memorandum analyzing corporate governance issues relating to same (.2).	0.40	\$290.00
01/31/24	JPWI	Draft external overview of rights of member of California nonprofit religious corporation.	1.10	\$797.50
		Task Total:	10.70	\$8,642.50

011 Cash Management

01/03/24	EPK	Correspond with S. Levitt of A&M and P. Bongiovanni regarding funding request for Q1 2024 received from CCCEB and committee noticing requirements for same (.1); confer with senior Foley restructuring team regarding same (.3).	0.40	\$290.00
01/04/24	EPK	Correspond with client and A&M teams regarding CCCEB funding request and notice to be provided to the Committee regarding same.	0.20	\$145.00
01/04/24	MDL	Email correspondence with J. Blumberg (U.S. Trustee's office) and Lowenstein (J. Prol, B. Weisenberg) regarding notice of CCCEB payment.	0.10	\$67.50
01/04/24	MDL	Analyze information sent by P. Bongiovanni regarding CCCEB quarterly payment.	0.10	\$67.50
01/11/24	AMUE	Outline restricted gift issue and language for donation.	0.30	\$255.00
01/11/24	EPK	Correspondence with A. Uetz and R. Medeiros regarding restricted gift issues.	0.20	\$145.00
01/11/24	MRL	Confer with M. Moore regarding restricted cash for the diocese (.3); review cases on the issue of non-debtor restricted cash (1.2).	1.50	\$705.00
01/22/24	MDL	Analyze bank account closure and opening data sent by L. Oberempt.	0.20	\$135.00
01/23/24	EPK	Review email from counsel to Bank of America regarding application of cash management order to purported Bank of America deposit accounts (.1); address issues regarding same (.2).	0.30	\$217.50
01/23/24	MCM	Analyze results of location/parish analysis based on review of other documents and related issues.	1.10	\$770.00
01/23/24	MDL	Strategize regarding bank inquiry on deposit accounts.	0.10	\$67.50
01/23/24	SJM	Review email from Bank of America regarding accounts and applicability of cash management order (.3); email to M. Lee and E. Khatchatourian regarding approach to same (.1).	0.40	\$280.00

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01/24/24	EPK	Follow up on Bank of America deposit account issues (.1); review correspondence with counsel to Bank of America regarding same (.1).	0.20	\$145.00
01/24/24	SJM	Email to counsel for Bank of America regarding RCBO not having accounts at BofA.	0.30	\$210.00
01/25/24	MDL	Email correspondence with U.S. Trustee's office (J. Blumberg) and Committee counsel (J. Prol, B. Weisenberg) regarding schedule of RCC interest payments for calendar year 2024.	0.10	\$67.50
01/25/24	MDL	Email correspondence with U.S. Trustee's office (J. Blumberg) and Committee counsel (J. Prol, B. Weisenberg) regarding notice of January 2024 RCC payment.	0.10	\$67.50
01/30/24	MDL	Email exchange with S. Levitt (A&M) regarding disclosure of opening and closing of parish bank accounts.	0.10	\$67.50
01/31/24	EPK	Address issues relating to parish bank accounts and restricted funds in same.	0.70	\$507.50
		Task Total:	6.40	\$4,210.00

016 General Case Strategy (includes team calls)

01/02/24	AMUE	Draft strategy memorandum as requested by client regarding mediation-related issues.	1.50	\$1,275.00
01/02/24	AMUE	Review important case rulings from other diocese cases as requested by client leadership for consideration (1.2); revisions to memorandum regarding same (.9).	2.10	\$1,785.00
01/04/24	AMUE	Weekly strategy meeting with Foley-A&M teams.	0.50	\$425.00
01/04/24	EPK	Weekly estate advisors call to coordinate with respect to case developments, strategy, and near-term tasks (.5); call with S. Moses to discuss case administrative relief to be sought and general case strategy (.4).	0.90	\$652.50
01/04/24	JRBL	Weekly strategy call with Foley and A&M teams.	0.50	\$575.00
01/04/24	LFG	Participate in team strategy call with Foley and A&M.	0.50	\$500.00

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01/04/24	MCM	Weekly strategy meeting with Foley and A&M teams.	0.50	\$350.00
01/04/24	SJM	Email to A. Uetz regarding matters for hearing on 1/9.	0.40	\$280.00
01/04/24	SJM	Telephone call with E. Khatchaturian regarding case matters including upcoming removal extension motion, correction to lease order, and CTN disclosure issue.	0.40	\$280.00
01/04/24	TFCA	Attend professional call (.5); follow up with J. Blease regarding scheduling and strategy (.3).	0.80	\$960.00
01/08/24	SJM	Email correspondence with A. Uetz, E. Ridley, and M. Lee regarding preparation for hearing on January 9.	0.40	\$280.00
01/09/24	MDL	Telephone conference with A. Uetz regarding results of hearing on motion to mediate and action items following same.	0.80	\$540.00
01/09/24	MRL	Email correspondence with A. Uetz regarding status of the case and result of the hearing held today (.3); discuss with M. Moore the update of the case and strategize next steps (.2).	0.50	\$235.00
01/09/24	TFCA	Review PowerPoint and provide comments (.7); telephone call with M. Schieble and team regarding tax transition issues (.5); review follow-up emails regarding updated comments for PowerPoint (.3); follow-up strategy call with J. Blease (.2); review A. Uetz court update (.2).	1.90	\$2,280.00
01/10/24	AMUE	Review communication received from R. Harris regarding Friars' case.	0.20	\$170.00
01/10/24	AMUE	Draft outline of restricted assets issue for client (.5); outline canon law issue (.6) and discuss same with M. Lee (.2); outline strategy memorandum as requested by client (1.2).	2.50	\$2,125.00
01/10/24	EPK	Correspondence with Foley restructuring and litigation teams regarding analysis of canon law and civil law issues.	0.20	\$145.00
01/10/24	MCM	Review email correspondence regarding necessary research and analysis of canon law issues (.3); strategize regarding analysis and prior research done (.3); email correspondence with M. Rofaail regarding same (.3).	0.90	\$630.00

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01/10/24	MDL	Evaluate intersection of canon law and civil law in Diocesan bankruptcy cases.	0.30	\$202.50
01/10/24	MRL	Confer with M. Moore regarding status of the case and mediation progress (.6); email correspondence with team regarding research and update on the issue of civil versus canon law (.3).	0.90	\$423.00
01/11/24	AMUE	Weekly check-in strategy meeting with Foley and A&M teams.	0.50	\$425.00
01/11/24	AMUE	Meet with Foley team to develop case strategy memorandum as requested by client.	0.80	\$680.00
01/11/24	EPK	All-Foley teams coordination call to discuss case strategy and critical case tasks and developments (.8); brief touch-base call with M. Lee and M. Moore regarding applicable law analysis (.3); weekly Foley and A&M teams strategy and coordination call (.5).	1.60	\$1,160.00
01/11/24	JRBL	Meeting with Foley and A&M teams.	0.50	\$575.00
01/11/24	LFG	Prepare for (.2) and participate in case strategy calls with clients (.5) and A&M team (.5).	1.70	\$1,700.00
01/11/24	MCM	Prepare for (.2) and conference call with Foley team to discuss outstanding workstreams, client information requests, and related analysis (.8).	1.00	\$700.00
01/11/24	MDL	Participate in weekly Foley-A&M strategy and case update call.	0.50	\$337.50
01/11/24	MDL	Conference call with E. Khatchaturian and M. Moore regarding description of canon law vs. civil law issues to be included in strategy memorandum requested by client.	0.20	\$135.00
01/11/24	MDL	Conference call with Foley team regarding topics for drafting strategy memorandum requested by client.	0.80	\$540.00
01/11/24	MR	Attend case team strategy call regarding outstanding case tasks and strategy memorandum (.8); attend strategy call with M. Lee, M. Rofaail, and M. Mitcham regarding review of documents for production to the Committee (.5).	1.30	\$734.50
01/11/24	MRL	All-hands meeting to discuss status (internal to Foley) and assign strategy memo inserts.	0.90	\$423.00

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01/11/24	TFCA	Telephone call with Foley team regarding strategy memo (.7); attend professionals call (.5).	1.20	\$1,440.00
01/12/24	EPK	Address asset analysis and applicable law issues with the Foley restructuring working group.	1.70	\$1,232.50
01/12/24	MCM	Work on analysis of necessary motions, potential defensive measures, and claim-reconciliation issues for inclusion in client memorandum.	1.10	\$770.00
01/12/24	TFCA	Emails with M. Moore regarding scheduling meeting with A&M.	0.20	\$240.00
01/14/24	MRL	Summarize daily docket activity and upcoming deadlines for team.	0.30	\$141.00
01/15/24	EPK	Update issues list for restructuring strategy memorandum to be delivered to M. Kemner later this week (.2); confer with M. Lee and M. Moore regarding inserts for strategy memorandum and feedback on applicable canon law principles (.6); draft section of strategy memorandum regarding anticipated motion practice, contested matters, and adversary proceedings (1.8).	2.60	\$1,885.00
01/15/24	MCM	Draft claims inserts for strategy memo and circulate to Foley team for review.	1.20	\$840.00
01/15/24	MDL	Draft insert to strategy memo requested by client regarding plan confirmation statutory prerequisites and practical necessities.	1.60	\$1,080.00
01/15/24	MDL	Evaluate list and summary of potential motions to be filed in bankruptcy for purposes of inclusion in strategy memo requested by client.	0.40	\$270.00
01/15/24	MDL	Evaluate case law examining conflicts between canon law and civil law.	0.50	\$337.50
01/16/24	AMUE	Draft strategy memorandum addressing multiple discrete issues requested by client leadership.	1.70	\$1,445.00
01/16/24	EPK	Finish drafting Insert for client strategy memorandum regarding anticipated motion practice, contested matters, and adversary proceedings (1.4); confer with M. Moore regarding status of other inserts for strategy memorandum (.3); coordinate with M. Lee regarding comments to the memorandum (.1); review M. Moore's memorandum insert regarding preliminary reconciliation of claims (.1).	1.90	\$1,377.50

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01/16/24	MCM	Continue working on claims and motion-practice inserts for strategic memo to client.	1.00	\$700.00
01/16/24	MDL	Begin drafting insert to strategy memo requested by M. Kemner on history of discovery and potential additional discovery.	0.90	\$607.50
01/16/24	MDL	Revise insert to strategy memo requested by M. Kemner on potential motions to be filed in chapter 11 case.	0.70	\$472.50
01/16/24	SJM	Telephone call with M. Lee regarding mediation order and hearing, and revised confidentiality and protective order.	0.50	\$350.00
01/16/24	TFCA	Attend valuation discussion with Foley and A&M professionals.	1.00	\$1,200.00
01/17/24	AMUE	Draft lengthy strategy memorandum as requested by client in preparation for mediation.	3.60	\$3,060.00
01/17/24	JCH	Update summary of professionals' fees and expenses from San Francisco diocese case.	0.80	\$220.00
01/17/24	JRBL	Review materials related to processes and policies to prevent abuse in parishes and study data to provide to client.	0.80	\$920.00
01/17/24	MDL	Discussion with A. Uetz and E. Ridley regarding results of hearing and potential implications of different rulings.	0.60	\$405.00
01/17/24	MDL	Continue drafting summary of discovery to the Committee completed to date for client memorandum.	0.30	\$202.50
01/17/24	MDL	Discussion with A. Uetz regarding topics covered in strategy memo requested by M. Kemner.	0.20	\$135.00
01/17/24	MDL	Evaluate case law from bankruptcy courts and federal appellate courts regarding intersection of canon law and civil law.	2.40	\$1,620.00
01/17/24	NMCG	Research business judgment standards applicable to debtors in possession.	2.50	\$1,175.00

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01/18/24	EPK	Weekly Foley and A&M teams strategy and coordination call (.6); strategy and coordination call with S. Moses to discuss case administration and automatic stay issues (.9); review N. McGuffey's research regarding business judgment standard (.2); confer with M. Lee and M. Moore regarding status of analytical research for client strategy memorandum (.2).	1.90	\$1,377.50
01/18/24	ERR	Edit Kemner memo to address insurance coverage issues.	1.70	\$1,487.50
01/18/24	JRBL	Weekly check-in call with Foley and A&M teams.	0.50	\$575.00
01/18/24	MDL	Revise section for strategy memo to M. Kemner regarding discovery history and potential future discovery.	1.00	\$675.00
01/18/24	MDL	Participate in weekly Foley-A&M strategy call and case update.	0.50	\$337.50
01/18/24	MDL	Draft section for strategy memo to M. Kemner regarding canon law questions.	2.10	\$1,417.50
01/18/24	MDL	Revise strategy memo to M. Kemner.	1.50	\$1,012.50
01/18/24	TFCA	Attention to emails regarding draft memo.	0.50	\$600.00
01/19/24	AMUE	Finalize lengthy strategy memorandum as requested by client.	4.40	\$3,740.00
01/19/24	AMUE	Email communication with C. Moore regarding real property analysis.	0.70	\$595.00
01/19/24	AMUE	Review claims analysis update for purposes of strategy memorandum.	0.90	\$765.00
01/19/24	EPK	Work on discrete sections of the client strategy memorandum to be delivered to the client today (1.1); confer with A. Uetz regarding comments to the strategy memorandum (.5).	1.60	\$1,160.00
01/19/24	JCH	Prepare charts listing fees and expenses incurred by professionals in Rockville, Rochester, Syracuse and New Orleans diocese cases.	4.00	\$1,100.00
01/19/24	JRBL	Revise strategy memo for client.	2.20	\$2,530.00
01/19/24	JRBL	Make final revisions to client memo.	0.50	\$575.00
01/19/24	MDL	Revise multiple sections of strategy memo.	2.50	\$1,687.50

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01/19/24	MDL	Discussion with A. Uetz regarding content of strategy memo.	0.20	\$135.00
01/19/24	TFCA	Review draft memo to client and provide feedback (1.5); emails with A. Ouellette and J. Blease regarding jury focus groups (.3).	1.80	\$2,160.00
01/21/24	MCM	Analyze issues in connection with current/pending case status update to client (2.8) and draft same for review by Foley team prior to dissemination (1.2).	4.00	\$2,800.00
01/22/24	AMUE	Review updates for other pending diocese cases regarding plan confirmation.	0.50	\$425.00
01/22/24	JCH	Finalize summary of professional fees chart for Rochester (1.0); prepare same for Santa Rosa and San Francisco (.8).	1.80	\$495.00
01/22/24	MCM	Finalize memorandum regarding current/pending case status and send to M. Lee for review.	1.30	\$910.00
01/23/24	EPK	Call with M. Lee regarding high-priority tasks, case strategy, and estate-administration issues.	0.70	\$507.50
01/23/24	JRBL	Review memorandum on other diocesan bankruptcies in preparation for client meeting.	0.40	\$460.00
01/23/24	TFCA	Discuss various issues regarding prep for meeting regarding claims (.5); attention to Bank of America issue (.2); review M. Lee BK Diocese analysis (.7); review the settlement/verdict chart provided by J. Blease and telephone call regarding review of same (.5).	1.90	\$2,280.00
01/24/24	LFG	Prepare for (.3) and participate in call with A. Uetz and M. Lee regarding case strategy (.5).	0.80	\$800.00
01/24/24	MDL	Discussion with A. Uetz and L. Glahn regarding case strategy points including claims objections and evidence to support plan of reorganization.	0.50	\$337.50
01/25/24	AMUE	Attend weekly Foley-A&M strategy meeting.	0.40	\$340.00
01/25/24	EPK	Attend weekly Foley and A&M teams strategy call to discuss case developments, priority tasks, and coordination on current issues.	0.60	\$435.00
01/25/24	ERR	Attend conference calls with workstreams regarding case status and strategy regarding insurance issues.	0.50	\$437.50

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01/25/24	JRBL	Attend weekly check-in call with Foley & A&M.	0.50	\$575.00
01/25/24	LFG	Prepare for and participate in strategy calls with bankruptcy team (.5); client team call (.5).	1.00	\$1,000.00
01/25/24	TFCA	Attend call with professionals (.5); review settlement information regarding RCBO for A&M's calculations (.3); review bankruptcy data compiled by M. Moore and communicated to A&M for revision to PowerPoint (.3).	1.10	\$1,320.00
01/26/24	AMUE	Meeting with E. Ridley to review insurance analysis (.8); meeting with N. DeLuca to review claims analysis (.4).	1.20	\$1,020.00
01/27/24	TFCA	Review Orange case settlement facts.	0.30	\$360.00
01/29/24	AMUE	Finalize weekly strategy memorandum for client leadership team.	0.90	\$765.00
01/29/24	JSH	Prepare case information for consultant at client's request.	0.40	\$246.00
01/29/24	MDL	Telephone conference with S. Moses regarding strategy for January 31 hearing.	0.20	\$135.00
01/30/24	EPK	Call with M. Lee to discuss CTN issues and analysis of assets in general.	0.30	\$217.50
01/30/24	MDL	Telephone conference with E. Khatchatourian regarding planning for discussion with CTN and Diocese of San Jose personnel about options for treatment of CTN interest.	0.40	\$270.00
Task Total:			104.40	\$81,715.00

017 Hearings and Court Matters

01/05/24	SJM	Draft status conference statement for 1/9 status conference.	3.20	\$2,240.00
01/07/24	MDL	Revise 1/9 status conference report.	0.70	\$472.50
01/08/24	AMUE	Revise two versions of case management statement for filing with the Court (1.1); prepare for hearing on motion for mediation (1.2); prepare for case management conference (.6); review status of competing protective orders in case Court addresses same during hearing (.4).	3.30	\$2,805.00

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01/08/24	EPK	Review drafts of status conference statement for January 9, 2024 status conference (.2); comment on same (.2); correspond with A. Uetz and S. Moses regarding case developments to be included in same (.3).	0.70	\$507.50
01/08/24	JCH	Prepare materials for January 9, 2024 hearing.	0.60	\$165.00
01/08/24	MDL	Continue to revise status conference report.	0.20	\$135.00
01/08/24	SJM	Revise status conference statement to address additional matters including claims analysis, professional fees, Committee information requests, and other matters (2.2); finalize status conference statement following further comments from A. Uetz (.4).	2.60	\$1,820.00
01/09/24	AMUE	Prepare for hearing on motion regarding mediation (.8); prepare for hearing on motion regarding late-filed claims (.3); prepare for status conference (.4).	1.50	\$1,275.00
01/09/24	AMUE	Appearance in person at Court hearing regarding multiple matters (motion to mediate, status conference in chapter 11, motion for clarification regarding Committee 2004 motion, motion to treat late-filed claims as timely filed, and dispute regarding entry of protective order) (4.5); two meetings with counsel for insurers M. Plevin and T. Schiavoni (.8); two meetings with B. Weisenberg and J. Prol (.7); write up notes from hearing for client (.9).	6.90	\$5,865.00
01/09/24	ERR	Attend via telephone hearing on mediation motion and status of Chapter 11 case (partial - with focus on insurance objections).	2.50	\$2,187.50
01/09/24	MDL	Appear remotely for RCBO at hearing on motion to mediate and other matters (partial).	3.10	\$2,092.50
01/09/24	SJM	Telephonically attend mediation motion (for part) (1.6); analyze terms of Santa Rosa Diocese mediation order (.6); email to A. Uetz regarding Santa Rosa order (.1).	2.30	\$1,610.00
01/17/24	AMUE	Prepare for further hearing on motion for entry of mediation order (.5); appearance at hearing (.9).	1.40	\$1,190.00
01/17/24	ERR	Attend hearing on order regarding mediation (partial).	0.70	\$612.50

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01/17/24	MDL	Attend hearing on mediation motion for Debtor.	0.90	\$607.50
01/30/24	SJM	Email correspondence with J. Blumberg regarding continuing January 31 hearing (.3); telephone call to chambers regarding continuing January 31 hearing (.1); draft stipulation to continue January 31 hearing (.8); email correspondence regarding stipulation (.3); finalize stipulation to continue hearing (.2).	1.70	\$1,190.00
Task Total:			32.30	\$24,775.00

020 Retention/Billing/Fee Applications for Debtor Professionals

01/02/24	SJM	Review status of monthly fee statements.	0.40	\$280.00
01/03/24	JCH	Prepare certificates of no objection for Foley and A&M November monthly fee statements.	0.50	\$137.50
01/03/24	SJM	Review draft certificates of no objection for monthly fee statements (.2); email correspondence with J. Harrison regarding filing of CNOs (.2).	0.40	\$280.00
01/05/24	MCM	Review proposed fee-examiner order from Committee counsel and revise same (.6); circulate revised fee order to Foley team for further review (.2).	0.80	\$560.00
01/08/24	TND	Review issues related to timing of December monthly statement and other upcoming deadlines.	0.10	\$67.50
01/09/24	TND	Prepare December 2023 Foley Monthly Fee Statement to ensure compliance with UST Guidelines.	1.10	\$742.50
01/10/24	TND	Further preparation of the December Foley fee statement to ensure compliance with UST guidelines.	1.90	\$1,282.50
01/11/24	TND	Further review of Foley December fee statement to ensure compliance with UST guidelines.	0.40	\$270.00
01/12/24	MCM	Work on issues in connection with appointment of fee examiner, including comments to proposed order negotiated with the Committee.	0.50	\$350.00

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01/16/24	TND	Calculate timing for filing of Second Interim Fee Applications (.2); email to J. Breall regarding upcoming filing dates (.2); email to A&M regarding upcoming filing dates (.1); discussions with Foley team on information needed for Second Interim Fee Application (.3); review issues related to payment of OCP fees (.1).	0.90	\$607.50
01/17/24	JCH	Prepare draft of cover sheet for Foley monthly fee statement for December 2023 (.5); prepare draft of Foley second interim fee application (.8).	1.30	\$357.50
01/18/24	SJM	Review draft stipulation to continue objection deadline for fee examiner motion (.3); email to G. Albert regarding approval of stipulation (.1).	0.40	\$280.00
01/22/24	TND	Review additional information needed to ensure compliance with the UST guidelines for December fee statement.	0.30	\$202.50
01/23/24	JCH	Telephone correspondence with A. Estrada at KCC regarding new wiring instructions.	0.20	\$55.00
01/23/24	MDL	Provide instruction to J. Harrison regarding KCC payments and invoices.	0.10	\$67.50
01/24/24	TND	Further preparation of December monthly fee statement for Foley to ensure compliance with UST Guidelines.	1.50	\$1,012.50
01/29/24	AMUE	Finalize monthly fee statement for December time to ensure compliance with UST Guidelines.	0.60	\$510.00
01/29/24	JCH	Revise Foley monthly fee statement for December 2023 to comply with UST guidelines.	0.80	\$220.00
01/29/24	TND	Review A&M December fee statement (.2); finalize Foley December statement (1.8) to comply with UST guidelines; begin work on Foley second interim fee application (.6).	2.60	\$1,755.00
01/30/24	JCH	File Foley and A&M monthly fee statements for December 2023 (.6) and calendar related response deadline (.2).	0.80	\$220.00
01/30/24	TND	Finalize Foley December fee statement to ensure compliance with UST Guidelines (.2); email with S. Levitt regarding A&M December fee statement (.1).	0.30	\$202.50

01/31/24	TND	Begin gathering information needed for Second Interim Fee Application (.5); discuss information on claims and insurance adversary to be included with E. Ridley and M. Moore (.2).	0.70	\$472.50
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	Task Total:	16.60	\$9,932.50
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021 Retention/Fee Applications: Ordinary Course Professionals

01/03/24	AMUE	Review whether any objections were filed to OCP notice regarding M. Kemner (.2); draft email to client leadership team regarding OCP retention of M. Kemner (.3).	0.50	\$425.00
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01/03/24	TND	Prepare email to Dr. Kemner and client regarding approved OCP retention (.3); review email from J. Bair on insurance archaeologists (.1).	0.40	\$270.00
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01/17/24	TND	Calls and emails with M. Kemner regarding information needed for invoice (.4); review invoice for compliance with OCP requirements and agreement to provide to the U.S. Trustee and the Committee (.5).	0.90	\$607.50
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01/18/24	MDL	Email exchange with A. Uetz and T. Dolcourt regarding Committee rights with respect to VeraCruz invoices.	0.10	\$67.50
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01/18/24	TND	Review requirements for Kemner OCP invoice submission (.2); follow-up email to M. Kemner regarding same (.1).	0.30	\$202.50
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01/23/24	MDL	Email correspondence with B. Weisenberg and C. Restel regarding VeraCruz December 2023 charges.	0.10	\$67.50
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01/23/24	TND	Email with A&M on Quarterly OCP report (.1); prepare draft certificate of compliance with OCP Order and Quarterly report (.2).	0.30	\$202.50
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01/24/24	TND	Email correspondence with Committee insurance counsel regarding retention of IAS as OCP.	0.10	\$67.50
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01/26/24	TND	Email correspondence with A&M and Foley team regarding quarterly OCP report (.2); draft OCP supplement for IAS (.2).	0.40	\$270.00
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01/29/24	JCH	Finalize Certificate of Compliance with ordinary course professional order for filing.	0.20	\$55.00
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01/29/24	MDL	Telephone conference with T. Dolcourt regarding OCP quarterly report and M. Kemner OCP status.	0.10	\$67.50
01/29/24	TND	Finalize quarterly OCP report.	0.40	\$270.00
01/31/24	TND	Review issues related to increasing OCP cap and need for motion on same.	0.70	\$472.50
		Task Total:	4.50	\$3,045.00

022 Retention/Fee Applications: Other Professionals

01/03/24	SJM	Review chart of monthly fee balances for Committee professionals.	0.20	\$140.00
01/04/24	SJM	Confirm status of monthly fee statements for professionals (.3); draft email to P. Bongiovanni regarding upcoming payments to professionals (.5); email to J. Breall regarding status of CNO on monthly statement (.1); revise and send email to P. Bongiovanni regarding payments (.1).	1.00	\$700.00
01/09/24	SJM	Respond to A. Uetz regarding email to client on monthly fee statements for Committee professionals.	0.20	\$140.00
01/17/24	SJM	Email to M. Lee regarding BRG monthly fee statements.	0.20	\$140.00
01/19/24	SJM	Review compensation procedures order regarding timing of interim fee applications (.2); respond to Committee counsel regarding timing for filing and Debtor preparation of combined notice (.2).	0.40	\$280.00
01/26/24	JCH	Email correspondence with A. Uetz and M. Lee regarding comparison of chart of professionals' fees of other diocese cases vs. amounts provided by client.	0.50	\$137.50
01/29/24	SJM	Telephone call with M. Lee regarding status of monthly fee notices (.1); email to J. Harrison regarding summary of same (.1).	0.20	\$140.00
		Task Total:	2.70	\$1,677.50

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

01/04/24	EPK	Correspond with S. Levitt of A&M regarding procedural issues related to Rule 2015.3 reporting for CTN interest (.2); draft Rule 2015.3(e) notice addressed to CTN and the Diocese of San Jose (.4); correspond with P. Bongiovanni and A&M team regarding notice to be provided (.3).	0.90	\$652.50
01/08/24	EPK	Correspondence with S. Levitt of A&M regarding updated draft of Rule 2015.3 report for legal review and requisite notice prior to filing of same.	0.30	\$217.50
01/10/24	EPK	Correspond with S. Levitt regarding status of CTN Rule 2015.3 report and update regarding wages order reporting issues.	0.30	\$217.50
01/17/24	EPK	Short call with P. Bongiovanni regarding notice relating to CTN Rule 2015.3 reporting (.1); review notifications sent to CTN and Diocese of San Jose regarding same (.2).	0.30	\$217.50
01/21/24	EPK	Review December 2023 MOR package (.3); review issues list flagged by A&M team regarding same (.1); comment on December 2023 MOR package (.2).	0.60	\$435.00
01/22/24	EPK	Correspondence (.2) and brief call (.1) with P. Bongiovanni and the A&M team regarding review and finalization of the December 2023 MOR package for filing today; coordinate with J. Harrison regarding filing and service of the December 2023 MOR package (.1); oversee filing and service of MOR (.3).	0.70	\$507.50
01/24/24	EPK	Review draft of the first Rule 2015.3 report for CTN (.3); correspond with the A&M team regarding comments to the CTN Rule 2015.3 report (.1); evaluate amount of quarterly U.S. Trustee fees to be paid for Q4 2023 (.1); email correspondence with P. Bongiovanni and S. Levitt of A&M regarding same (.2).	0.70	\$507.50
01/25/24	EPK	Review updated Rule 2015.3 report package for first CTN report to be filed in early February.	0.20	\$145.00

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01/26/24	EPK	Comment on revised draft of Rule 2015.3 report for CTN (.1); correspond with C. Wiltgen of A&M and P. Bongiovanni regarding updated draft of CTN report for client review and comment (.2).	0.30	\$217.50
01/28/24	EPK	Review email from P. Bongiovanni regarding comments to the current draft of the CTN Rule 2015.3 report (.1); draft explanatory procedural footnote to be included in the report (.2); correspond with A&M team and P. Bongiovanni regarding incremental comments to the report (.2).	0.50	\$362.50
01/29/24	AMUE	Telephone conference with R. Harris regarding CTN disclosure (.2); review CTN issue regarding disclosure (.6).	0.80	\$680.00
01/29/24	EPK	Correspond with C. Wiltgen of A&M and P. Bongiovanni regarding revisions to the first CTN Rule 2015.3 report (.2); review proposed filing version of same (.1).	0.30	\$217.50
01/29/24	EPK	Correspond with Foley restructuring working group and the A&M team regarding potential protective order to be sought by CTN (.5); call with M. Lee regarding same (.3); email correspondence with counsel to CTN regarding reporting and protective order (.2); correspond with M. Lee regarding forthcoming discussion with the Diocese of San Jose regarding CTN (.2).	1.20	\$870.00
01/29/24	ERR	Review issues raised by counsel for CTN.	0.40	\$350.00
01/29/24	JPWI	Review correspondence related to CTN meeting and related disclosure obligations (.2); prepare for same (.2).	0.40	\$290.00
01/29/24	MDL	Telephone conference with E. Khatchaturian regarding Rule 2015.3 disclosure of CTN interest and financials.	0.20	\$135.00
01/29/24	MDL	Analyze CTN confidentiality demand from W. Smith (Binder Malter).	0.10	\$67.50

01/29/24	MDL	Email exchange with A. Uetz, E. Khatchatourian, and J. Witt (Foley) and C. Moore and S. Levitt (A&M) regarding response to CTN confidentiality demand prior to Rule 2015.3 disclosure.	0.20	\$135.00
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	Task Total:	8.40	\$6,225.00
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026 Unsecured Creditor Issues/Communications/Meetings

01/04/24	EPK	Coordinate with S. Levitt of A&M regarding diligence requests received from BRG team, including request for information regarding CTN (.2); analysis of Committee diligence requests relating to CTN (.5).	0.70	\$507.50
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01/05/24	AMUE	Telephone call with B. Weisenberg regarding possible resolution of U.S. Trustee objections (.3); further correspondence with B. Weisenberg regarding same (.8).	1.10	\$935.00
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01/29/24	MDL	Email exchange with B. Weisenberg and M. Kaplan (Lowenstein) regarding continuance of insurer defendants' hearing on motion to clarify.	0.10	\$67.50
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01/29/24	MDL	Correspondence with B. Weisenberg (Lowenstein) regarding agenda for 1/31 hearing.	0.20	\$135.00
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	Task Total:	2.10	\$1,645.00
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027 Real Estate and Real Property Issues

01/02/24	BJMO	Attention to correspondence regarding client plans for demolition of structures and related engagement of consultant regarding same.	0.20	\$150.00
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01/02/24	EPK	Confer with A. Uetz regarding school repairs issue and related strategy (.4); correspond with P. Bongiovanni regarding same (.1); analysis of whether proposed school repairs are ordinary-course transactions for the Diocese (1.3); correspond with J. Witt regarding documentation relating to the repairs (.3).	2.10	\$1,522.50
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01/02/24	JPWI	Revise memorandum regarding school repair issues.	0.40	\$290.00
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01/02/24	JRBL	Communication with S. Martinez regarding engineering to remove damaged property.	0.80	\$920.00
01/03/24	EPK	Follow up with A. Uetz regarding school repair issues.	0.20	\$145.00
01/03/24	KAFA	Analysis of status update photos and videos provided by S. Martinez and S. Johnson from December 21st site visit (.8); strategize regarding commencement of demolition subcontractor to remove damaged improvements (.3).	1.10	\$412.50
01/04/24	BJMO	Attention to issues with coordination of consultant site inspection (.3); respond to client correspondence regarding hard scape work in erosion control (.3).	0.60	\$450.00
01/04/24	JRBL	Review emails and photographs from S. Martinez regarding imminent harm from falling trees (.4); communication with soil engineering firm regarding assessment of conditions at site (.5); review City documents related to Kirker Creek drainage and planned improvements to assess liability issues (1.4).	2.30	\$2,645.00
01/04/24	JRBL	Telephone conference with S. Martinez to respond to her questions about removal of certain improvements.	0.20	\$230.00
01/04/24	KAFA	Analysis of S. Martinez update from City including additional photos and videos taken at the site (.3); analysis of LCC proposals and related communications (.3).	0.60	\$225.00
01/05/24	JRBL	Analysis of new information from engineering team regarding assessment of hazards and property conditions.	2.30	\$2,645.00
01/05/24	JRBL	Evaluation of proposals from engineers for potential repairs to property.	0.30	\$345.00
01/08/24	BJMO	Legal analysis regarding engineering and demolition issues regarding Good Shepherd (.6); review client material and engineering proposals (.3); teleconference with engineering consultant regarding demolition and analysis issues (.2).	1.10	\$825.00
01/08/24	JRBL	Analysis of geotechnical information related to removal of infrastructure and flooding concerns.	1.30	\$1,495.00

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01/08/24	KAFA	Conference to discuss LCC proposal for demo work.	0.60	\$225.00
01/09/24	BJMO	Teleconference and correspondence with engineering consultant regarding demolition and geotechnical issues.	0.40	\$300.00
01/10/24	JRBL	Further analysis of civil engineering proposals and draft recommendation to client.	1.30	\$1,495.00
01/11/24	JRBL	Telephone conference with P. Bongiovanni regarding removal of improvements and engineering studies.	0.80	\$920.00
01/11/24	KAFA	Analysis of client update related to tree removal at sinkhole.	0.20	\$75.00
01/12/24	JRBL	Communication with insurance broker regarding potential property insurance coverage.	0.80	\$920.00
01/14/24	JRBL	Telephone conference with P. Bongiovanni regarding removal of hazardous materials (.6); investigate issues (.7).	1.30	\$1,495.00
01/15/24	AMUE	Strategize regarding City of Pittsburg demand regarding sinkhole liability.	0.70	\$595.00
01/20/24	AMUE	Review email received from P. Bongiovanni regarding real estate valuation (.2); respond to same (.2).	0.40	\$340.00
Task Total:			20.00	\$18,665.00

028 Tort Claims

01/02/24	JRBL	Analysis of information gathered on tort claims in preparation for client meeting.	2.30	\$2,645.00
01/03/24	AROU	Attend informal status conference with Judge Wise.	1.00	\$750.00
01/03/24	AROU	Draft summary of informal status conference with Judge Wise.	0.40	\$300.00
01/03/24	TFCA	Review update from A. Ouellette regarding 5108 conference.	0.20	\$240.00
01/04/24	AROU	Attention to request from Plaintiff's counsel in the A.B. case regarding amendment to add defendant.	0.20	\$150.00

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01/04/24	AROU	Call from Plaintiff's counsel in the A.B. case regarding amendment to add defendant.	0.20	\$150.00
01/04/24	EPK	Follow up on scheduling of CMCs and docketing of same for the JCCP 5108 coordinated proceeding (.1); correspond with A. Ouellette regarding proposed amendment of JCCP 5108 complaint by certain plaintiffs' counsel (.2).	0.30	\$217.50
01/04/24	JRBL	Telephone conference with K. Farrar regarding claims analysis.	0.40	\$460.00
01/08/24	EPK	Follow up with S. Moses and A. Ouellette regarding proposed amendment of JCCP 5108 complaint requested by certain plaintiffs' counsel.	0.10	\$72.50
01/10/24	AROU	Correspond with JCCP 5108 liaison counsel.	0.20	\$150.00
01/11/24	AROU	Analyze case law and research for client memorandum regarding JCCP 5108 claims.	1.80	\$1,350.00
01/11/24	AROU	Draft client memorandum regarding JCCP 5108 claims.	0.90	\$675.00
01/11/24	AROU	Analyze appellate decision in John GM Roe v. Doe.	0.40	\$300.00
01/12/24	AROU	Call with liaison counsel for Institutional Defendants in JCCP 5108.	0.60	\$450.00
01/12/24	AROU	Prepare client memorandum regarding JCCP 5108 claims.	0.90	\$675.00
01/14/24	AROU	Draft client memorandum regarding JCCP 5108 claims.	3.70	\$2,775.00
01/16/24	AROU	Draft client memorandum regarding JCCP 5108 claims.	1.90	\$1,425.00
01/16/24	JRBL	Review claims data and analysis in preparation for client call.	2.20	\$2,530.00
01/17/24	AROU	Attention to JCCP 5108 case management conference statement.	0.10	\$75.00
01/18/24	AROU	Analyze abuse case verdicts and settlements.	0.70	\$525.00
01/19/24	AROU	Analyze sexual assault verdicts.	1.10	\$825.00
01/19/24	AROU	Draft client memorandum regarding JCCP 5108 claims.	0.50	\$375.00

01/22/24	JRBL	Reviews verdicts and settlements data in preparation for client meeting.	2.30	\$2,645.00
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Task Total:			22.40	\$19,760.00
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029 Non-tort Proofs of Claim

01/29/24	MCM	Email correspondence with Foley team regarding non-tort proofs of claim and claims register (.2); email correspondence with KCC regarding updated register and related issues (.3).	0.50	\$350.00
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01/29/24	MDL	Email exchange with M. Moore regarding Committee access to trade claims register.	0.10	\$67.50
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01/29/24	MDL	Email exchange with B. Clark (Lowenstein) regarding trade claim register.	0.10	\$67.50
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Task Total:			0.70	\$485.00
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031 Insurance Issues (coverage, includes adversary proceeding)

01/02/24	ERR	Review issues related to status of tenders and responses thereto.	0.30	\$262.50
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01/02/24	ERR	Review edits to insurers' proposed protective order.	0.40	\$350.00
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01/02/24	ERR	Review case status pending regarding adversary proceeding and potential mediation.	0.40	\$350.00
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01/02/24	MCM	Email correspondence with professionals at AJG regarding execution of confidentiality agreements to allow exchange of proofs of claim and facilitate tenders of same.	0.50	\$350.00
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01/02/24	MRL	Work on claims analysis in order to organize claims with the appropriate insurance policies.	0.80	\$376.00
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01/03/24	ERR	Continue review of insurance tender analysis regarding coverage position.	1.00	\$875.00
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01/03/24	MRL	Analyze claims in order to organize claims with the appropriate insurance policies.	1.70	\$799.00
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01/04/24	ERR	Telephone call with client regarding case status and issues regarding pending tenders to insurers and insurer response to amended complaint.	0.50	\$437.50
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01/04/24	ERR	Review issues related to coordination of insurance analysis with potential plan.	0.50	\$437.50
01/04/24	MRL	Analyze claims in order to organize claims with the appropriate insurance policies.	2.10	\$987.00
01/05/24	DMH	Analyze recent insurer response letters from Westport and Chubb to update matrix of insurance coverage.	3.50	\$1,575.00
01/05/24	ERR	Review issues regarding tender to Lloyds syndicates and potential need for further amendment.	0.90	\$787.50
01/05/24	ERR	Telephone conference with J. Bair (Committee coverage counsel) regarding coverage issues and potential further amendment regarding adversary proceeding.	0.50	\$437.50
01/05/24	ERR	Telephone call with J. Breall regarding coordination of AP actions.	0.50	\$437.50
01/05/24	JRBL	Review Chubb decision and other insurance orders to prepare for client call.	1.30	\$1,495.00
01/05/24	MRL	Email correspondence regarding edits to the second amended complaint (.2); analyze insurance policies for the claims (1.1).	1.30	\$611.00
01/07/24	AMUE	Review issue concerning further amendment of adversary proceeding complaint.	0.50	\$425.00
01/07/24	DMH	Conduct insurance coverage analysis for 10 claims against RCBO.	2.10	\$945.00
01/07/24	ERR	Review amended complaint regarding Lloyds and provide analysis regarding coordination of adversary proceedings.	0.60	\$525.00
01/07/24	MRL	Analyze insurance policies regarding the sexual abuse claims.	3.00	\$1,410.00
01/08/24	DMH	Analyze recent insurer responses from Westport, Chubb, and AIG to RCBO tenders to update matrix of insurance coverage and Exhibit A to amended complaint.	5.30	\$2,385.00
01/08/24	ERR	Review additional responses to tenders by Chubb and provide assistance regarding preparation for hearing regarding status and mediation.	1.00	\$875.00

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01/08/24	MRL	Analyze insurance policies regarding sexual abuse claims.	5.30	\$2,491.00
01/09/24	DAAB	Review sample claims analysis and recurring reservation of rights materials ahead of beginning insurance analysis.	0.40	\$200.00
01/09/24	DMH	Conduct analysis of insurer responses and potential coverage for 7 claims against RCBO.	5.00	\$2,250.00
01/09/24	MRL	Review and analyze insurance policies regarding the sexual abuse claims.	7.30	\$3,431.00
01/10/24	DAAB	Begin analyzing claims and applicable insurance policies.	2.70	\$1,350.00
01/10/24	DMH	Conduct analysis of insurer responses and coverage for 9 claims against RCBO.	5.20	\$2,340.00
01/10/24	DMH	Analyze recent insurer responses to 5 claims to update matrix of insurance coverage for RCBO claims.	0.30	\$135.00
01/10/24	MRL	Continue analysis of insurance policies regarding the sexual abuse claims.	6.50	\$3,055.00
01/11/24	DMH	Conduct analysis of potential insurance coverage of claims for 5 claims against RCBO.	0.70	\$315.00
01/11/24	DMH	Update Exhibit A to amended complaint based on recent insurer responses to RCBO claim tenders.	1.00	\$450.00
01/11/24	MRL	Continue analysis of insurance policies regarding the sexual abuse claims.	2.20	\$1,034.00
01/12/24	ERR	Finalize third amended complaint and attached Ex. A.	1.30	\$1,137.50
01/12/24	JCH	Revise Third Amended Complaint and related Exhibit A (.8); file Third Amended Complaint (.2).	1.00	\$275.00
01/12/24	MRL	Continue analysis of insurance policies regarding the sexual abuse claims.	2.50	\$1,175.00
01/12/24	SJM	Review draft third amended complaint (.4); email correspondence with J. Harrison and E. Ridley regarding finalizing and filing complaint (.2).	0.60	\$420.00
01/13/24	MRL	Continue analysis of insurance policies regarding the sexual abuse claims.	1.60	\$752.00

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01/15/24	MRL	Continue analysis of insurance policies regarding the sexual abuse claims.	2.00	\$940.00
01/16/24	JCH	Calendar response deadline to Debtor's Third Amended Complaint.	0.20	\$55.00
01/16/24	MR	Analyze insurance coverage for claims underlying adversary proceeding.	1.20	\$678.00
01/16/24	MRL	Continue analysis of insurance policies regarding the sexual abuse claims.	3.50	\$1,645.00
01/17/24	ERR	Draft memo regarding potential insurance motions and coverage analysis.	0.50	\$437.50
01/17/24	MR	Analyze insurance coverage for claims underlying adversary proceeding.	6.40	\$3,616.00
01/18/24	DAAB	Continue analysis of claims and applicable insurance policies.	1.80	\$900.00
01/18/24	DMH	Analyze roughly 60 claims against RCBO for potential insurance coverage, including existing insurer responses and potential coverage under various policies.	6.20	\$2,790.00
01/18/24	ERR	Review issues regarding coverage regarding abuse claim.	0.60	\$525.00
01/18/24	ERR	Attend conference call with client representatives regarding case status and strategy including issues regarding insurance coverage.	0.70	\$612.50
01/18/24	JRBL	Address coverage issues with respect to shared policies and report to client.	1.30	\$1,495.00
01/18/24	MR	Analyze insurance coverage for claims underlying adversary proceeding.	2.20	\$1,243.00
01/18/24	MRL	Continue analysis of insurance policies regarding the sexual abuse claims.	1.40	\$658.00
01/19/24	DAAB	Continue analysis of claims and applicable insurance policies.	1.40	\$700.00
01/19/24	DMH	Conduct claim analysis to assist in determining insurance coverage available for roughly 90 claims against RCBO.	10.80	\$4,860.00
01/19/24	ERR	Review coverage issues regarding abuse matter.	0.40	\$350.00
01/19/24	ERR	Edit Kemner memo regarding insurance analysis.	0.70	\$612.50

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01/19/24	MR	Analyze insurance coverage for claims underlying adversary proceeding.	2.10	\$1,186.50
01/19/24	MRL	Finalize review of the insurance policies regarding the sexual abuse claims.	5.60	\$2,632.00
01/20/24	DAAB	Continue analysis of claims and applicable insurance policies.	5.50	\$2,750.00
01/20/24	MR	Analyze insurance coverage for claims underlying adversary proceeding.	2.90	\$1,638.50
01/21/24	DAAB	Continue analysis of claims and applicable insurance policies.	10.40	\$5,200.00
01/21/24	MR	Analyze insurance coverage for claims underlying adversary proceeding.	9.50	\$5,367.50
01/22/24	DAAB	Continue analysis of claims and applicable insurance policies.	3.80	\$1,900.00
01/22/24	DMH	Finalize document of insurance claims analysis for all claims against RCBO, including analyzing periods with insolvent insurers.	5.70	\$2,565.00
01/22/24	MR	Analyze insurance coverage for claims underlying adversary proceeding.	2.00	\$1,130.00
01/23/24	MR	Analyze insurance coverage for claims underlying adversary proceeding.	1.80	\$1,017.00
01/24/24	DMH	Prepare claims analysis document analyzing potential insurance coverage for all claims against RCBO.	4.80	\$2,160.00
01/24/24	ERR	Review coverage analysis memo (1.9) and edit same (1.7).	3.60	\$3,150.00
01/24/24	MR	Complete analysis of insurance coverage for claims underlying adversary proceeding.	1.90	\$1,073.50
01/25/24	DMH	Analyze matrix of insurance coverage for claims to determine number of claims implicating Travelers and Chubb, and number of claims which implicate both.	3.40	\$1,530.00
01/26/24	ERR	Briefly review answers and motions to dismiss by insurers and CIGA.	0.80	\$700.00
01/27/24	AMUE	Review defendant responses to amended complaint (answer and motion to dismiss).	0.90	\$765.00

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01/29/24	ERR	Review withdrawal of CIGA motion regarding docketing issues.	0.50	\$437.50
01/29/24	JCH	Review Motions to Dismiss filed in insurance adversary proceedings.	0.50	\$137.50
01/30/24	AMUE	Review status of insurance tenders.	0.30	\$255.00
01/31/24	MR	Review and draft summary of Answers and Motions to Dismiss filed by insurers in response to Third Amended Complaint in the adversary proceeding.	1.90	\$1,073.50
Task Total:			181.50	\$96,729.50

032 Rule 2004 Motions/Discovery/Subpoenas

01/02/24	AMUE	Review email received from B. Weisenberg regarding document production designations (.2) and draft initial response to same (.2); begin to outline position regarding same (.4).	0.80	\$680.00
01/02/24	JSH	Review documents for production.	0.40	\$246.00
01/02/24	MDL	Analyze list of documents sent by the Committee which the Committee proposed to be re-designated from Highly Confidential to Confidential.	0.20	\$135.00
01/03/24	JSH	Analyze responses to questions regarding confidentiality order.	0.50	\$307.50
01/03/24	KAFA	Analysis of documents requested for de-designation of highly confidential branding as requested by Lowenstein.	1.10	\$412.50
01/03/24	KAFA	Preparation of client documents for production to the Committee.	0.90	\$337.50
01/03/24	MDL	Evaluate documents requested by the Committee for re-designation as Confidential.	0.60	\$405.00
01/05/24	MDL	Email correspondence with P. Bongiovanni regarding documents the Committee requested for re-designation to Confidential.	0.70	\$472.50
01/05/24	MDL	Telephone conference with S. Levitt (A&M) regarding Committee request to re-designate documents as Confidential.	0.20	\$135.00

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01/07/24	MDL	Email exchange with S. Levitt (A&M) regarding response to BRG questions on retirement plans, OPF transaction, and Non-Debtor Catholic Entity financial statements.	0.40	\$270.00
01/07/24	MDL	Email correspondence with Lowenstein (M. Kaplan, C. Restel) regarding insurers' comments to protective order.	0.10	\$67.50
01/07/24	MDL	Analyze insurers' proposed revisions to form confidentiality order.	0.10	\$67.50
01/08/24	KAFA	Prepare documents received from client for review and production to the Committee.	0.70	\$262.50
01/08/24	MDL	Revise form protective order.	0.50	\$337.50
01/08/24	MDL	Telephone conference with Lowenstein (C. Restel, M. Kaplan) regarding review of insurers' proposed revisions to form protective order.	0.60	\$405.00
01/08/24	MDL	Telephone conference with S. Levitt regarding BRG requests for information on Oakland Parochial Fund, Lumen Christi Academies, and CCCEB.	0.20	\$135.00
01/08/24	MDL	Email correspondence with insurers' counsel regarding revisions to form protective order.	0.20	\$135.00
01/10/24	KAFA	Prepare documents received from client for review and production to the Committee (.9); diligence call with P. Bongiovanni, D. Flanagan and A&M (.4).	1.30	\$487.50
01/10/24	MDL	Evaluate status of RCBO document review and remaining BRG requests to be satisfied.	0.70	\$472.50
01/10/24	MDL	Email exchange with Foley associates (M. Rofaeil, M. Mitcham, M. Roberts) regarding review of documents related to Diocesan Review Board process.	0.20	\$135.00
01/10/24	MDL	Provide instruction to J. Harper regarding review of documents related to restricted cash analysis.	0.10	\$67.50
01/10/24	MDL	Participate in regular document diligence call with P. Bongiovanni and S. Levitt (A&M).	0.40	\$270.00
01/10/24	MDL	Telephone conference with K. Farrar regarding status of document review for collected documents.	0.20	\$135.00

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01/10/24	MRL	Email correspondence with M. Lee regarding document review assignment.	0.20	\$94.00
01/11/24	KAFA	Prepare documents received from client for review and production to the Committee.	2.10	\$787.50
01/11/24	MDL	Telephone conference with M. Roberts, M. Mitcham, and M. Rofaeil (all of Foley) regarding Diocesan Review Board document review parameters and privilege issues.	0.50	\$337.50
01/11/24	MDL	Analyze handwritten documents from employee files for final-level privilege review.	2.10	\$1,417.50
01/11/24	MDL	Email exchange with R. Medeiros and M. Ortega Smith (both of RCBO) regarding additional priest files to be reviewed.	0.20	\$135.00
01/11/24	MDL	Provide instruction to M. Schachte and K. Farrar (both of Foley) regarding production of re-designated documents following Committee confidentiality challenge.	0.10	\$67.50
01/11/24	MR	Analyze documents for production to the Committee.	0.30	\$169.50
01/11/24	MRL	Meeting with M. Lee, M. Mitcham, and M. Roberts regarding reviewing documents (.5); begin reviewing documents from diocese board meetings for privilege (.7).	1.20	\$564.00
01/11/24	MRM	Meeting to discuss document review with Foley team (.5); conduct document review (.3).	0.80	\$376.00
01/12/24	EPK	Review status notes and client input regarding responses to the Committee's recent diligence requests.	0.30	\$217.50
01/12/24	KAFA	Prepare documents received from client for review and production to the Committee.	1.20	\$450.00
01/12/24	KAFA	Preparation of redacted filed proofs of claim for production to insurers.	0.50	\$187.50
01/12/24	MR	Analyze documents for production to the Committee.	1.10	\$621.50
01/12/24	MRL	Begin reviewing documents from diocese board meetings for privilege.	1.90	\$893.00
01/13/24	MRL	Review documents from diocese board meetings for privilege.	2.00	\$940.00

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01/14/24	MR	Analyze documents for production to the Committee.	0.60	\$339.00
01/14/24	MRL	Review documents from diocese board meetings for privilege.	1.70	\$799.00
01/15/24	MR	Analyze documents for production to the Committee.	3.40	\$1,921.00
01/15/24	MRL	Review documents from diocese board meetings for privilege.	1.60	\$752.00
01/16/24	JSH	Review documents for production.	4.10	\$2,521.50
01/16/24	KAFA	Prepare documents received from client for review and production to the Committee.	1.00	\$375.00
01/16/24	MDL	Analyze Pacific Indemnity certification on proposed protective order and instances where Pacific inserted language not agreed to by Debtor.	0.20	\$135.00
01/16/24	MDL	Analyze financial history spreadsheet produced to the Committee by RCC.	0.10	\$67.50
01/16/24	MDL	Email exchange with R. Manns (Norton Rose Fulbright), counsel for RCC, regarding document production by non-debtor Catholic entities.	0.20	\$135.00
01/16/24	MDL	Email correspondence with A. Haberkorn (O'Melveny) and all insurance counsel regarding false certification on proposed protective order.	0.60	\$405.00
01/16/24	MDL	Strategize with S. Moses regarding approach to challenging Pacific's false certification on proposed protective order.	0.50	\$337.50
01/16/24	MRL	Review documents from diocese board meetings for privilege.	0.90	\$423.00
01/16/24	MRM	Analyze documents for privilege.	1.30	\$611.00
01/16/24	SJM	Prepare revised certificate of counsel regarding confidentiality and protective order (.7); revise draft certification based on comments from M. Lee, and to reflect minutes of November 14 hearing (.4); analyze insurer filing regarding confidentiality and protective order (.8); email to M. Lee regarding changes in insurer version of order (.2).	2.10	\$1,470.00
01/17/24	JSH	Review documents for production.	0.30	\$184.50

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01/17/24	KAFA	Prepare documents received from client for review and production to the Committee (2.6); attend diligence call with P. Bongiovanni, D. Flanagan and A&M (.4); prepare summary of client diligence call (.2).	3.20	\$1,200.00
01/17/24	MDL	Email exchange with Foley document review team regarding status of review and privilege or other issues encountered.	0.50	\$337.50
01/17/24	MDL	Analyze corrected submission on protective order to ensure accurate portrayal of points of agreement between Debtor and insurers.	0.20	\$135.00
01/17/24	MDL	Revise communication from S. Levitt (A&M) to BRG personnel regarding Lumen Christi, CCCEB, Oakland Parochial Fund, and CTN points of interest.	0.30	\$202.50
01/17/24	MRL	Finalize reviewing documents for privilege (.3); email correspondence regarding the same (.2).	0.50	\$235.00
01/17/24	MRM	Analyze documents for privilege.	3.70	\$1,739.00
01/18/24	MDL	Email exchange with C. Restel (Lowenstein) regarding the Committee's Rule 2004 motions, orders on same, and documents produced regarding same.	0.20	\$135.00
01/18/24	MDL	Analyze summary of client collection of additional requested employee files.	0.10	\$67.50
01/19/24	KAFA	Prepare documents received from client for review and production to the Committee.	1.30	\$487.50
01/19/24	MDL	Email correspondence with counsel for insurers regarding proposed compromise on form of protective order.	0.60	\$405.00
01/19/24	MDL	Telephone conference with C. Restel regarding revisions to insurers' proposed form of protective order.	0.40	\$270.00
01/19/24	SJM	Telephone call with M. Lee regarding confidentiality and protective order status (.2); email to chambers regarding same (.1).	0.30	\$210.00
01/22/24	KAFA	Prepare documents received from client for review and production to the Committee.	0.50	\$187.50

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01/22/24	MDL	Analyze email from J. Winters (O'Melveny) regarding counteroffer on proposed form of protective order.	0.10	\$67.50
01/22/24	MDL	Final level review of documents marked "Further Review" among employee and sensitive issues files.	1.30	\$877.50
01/22/24	MDL	Email correspondence with S. Levitt regarding forthcoming production of financial documents and BRG request for re-production of 2004-10 quinquennial report.	0.10	\$67.50
01/22/24	MDL	Provide instruction to K. Farrar regarding production of recently reviewed documents.	0.20	\$135.00
01/22/24	MDL	Email exchange with C. Restel (Lowenstein) regarding insurers' counteroffer on proposed form of protective order.	0.10	\$67.50
01/22/24	MR	Analyze documents for production to the Committee.	1.20	\$678.00
01/23/24	EPK	Review notes regarding OPF transaction (.4); correspond with A. Uetz regarding issues related to same (.2); analyze OPF transaction details and financial reports relating to same (.2).	0.80	\$580.00
01/23/24	JPWI	Prepare for call regarding meeting with Committee representatives regarding Oakland Parochial Fund (.5); participate on conference call regarding same (.7).	1.20	\$870.00
01/23/24	KAFA	Prepare documents received from client for review and production to the Committee.	2.00	\$750.00
01/23/24	MDL	Email exchange with J. Daniels (O'Melveny) regarding revised proposed form of protective order.	0.20	\$135.00
01/23/24	MDL	Analyze insurers' revisions to proposed form of protective order.	0.20	\$135.00
01/23/24	MDL	Email exchange with C. Restel (Lowenstein) regarding revised form of protective order.	0.20	\$135.00
01/23/24	MDL	Email exchange with A. Ermac regarding status of proposed form of order.	0.10	\$67.50

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01/23/24	MDL	Telephone conference with P. Bongiovanni, Foley (E. Khatchatourian and J. Witt) and A&M (S. Loop, S. Levitt) teams regarding Oakland Parochial Fund transaction and preparations for discussion of same with BRG.	0.70	\$472.50
01/23/24	MDL	Revise proposed form of protective order before sending back to insurers.	0.20	\$135.00
01/23/24	MDL	Telephone conference with Lowenstein (C. Restel, M. Kaplan) regarding insurers' revisions to form protective order.	0.50	\$337.50
01/24/24	EPK	Review email update from S. Levitt of A&M regarding results of meeting with BRG covering OPF transfer issues.	0.10	\$72.50
01/24/24	KAFA	Prepare documents received from client for review and production to the Committee (4.2); diligence call with P. Bongiovanni, D. Flanagan and A&M (.3).	4.50	\$1,687.50
01/24/24	MDL	Provide instruction to K. Farrar and M. Schachte regarding production of documents to the Committee.	0.20	\$135.00
01/24/24	MDL	Email correspondence with J. Daniels (O'Melveny) and the insurer defendants' counsel regarding revised proposed form of protective order.	0.20	\$135.00
01/24/24	MDL	Final review of documents to be produced to the Committee.	0.20	\$135.00
01/24/24	MDL	Telephone conference with P. Bongiovanni, D. Flanagan (VeraCruz), and A&M personnel (S. Levitt, C. Wiltgen) regarding progress of collection and production of documents requested by the Committee.	0.30	\$202.50
01/24/24	MDL	Email correspondence with R. Medeiros and M. Ortega Smith regarding review of additional employee files.	0.10	\$67.50
01/24/24	MDL	Revise proposed form of protective order.	0.20	\$135.00
01/24/24	MR	Analyze documents for production to the Committee.	0.40	\$226.00
01/25/24	KAFA	Prepare documents received from client for review and production to the Committee.	0.40	\$150.00

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01/26/24	MDL	Analyze employee files for responsiveness to Committee document requests.	0.30	\$202.50
01/26/24	MDL	Email correspondence with R. Medeiros regarding production of additional employee files.	0.30	\$202.50
01/30/24	KAFA	Prepare documents received from client for review and production to the Committee.	0.40	\$150.00
01/30/24	MCM	Work on issues in connection with production of abuse claims to insurers following entry of protective order and order modifying confidentiality procedures with respect to insurer expert.	0.60	\$420.00
01/30/24	MDL	Review revised protective order incorporating comments from Court.	0.10	\$67.50
01/30/24	MDL	Email exchange with counsel for insurer defendants regarding revisions to proposed order and Court's comments.	0.20	\$135.00
01/30/24	MDL	Email exchange with J. Prol (Lowenstein) regarding deficiencies in proposed protective order and agenda for 1/31 hearing.	0.10	\$67.50
01/30/24	SJM	Review insurers' proposed revisions to confidentiality and protective order to address deficiencies identified by court.	0.60	\$420.00
01/31/24	KAFA	Prepare documents received from client for review and production to the Committee (1.1); participate in diligence call (.5).	1.60	\$600.00
01/31/24	MCM	Work on issues in connection with production of abuse claims to insurers following entry of protective order and order modifying confidentiality procedures with respect to insurer expert.	0.40	\$280.00
		Task Total:	76.30	\$40,725.50

034 Other Motion Practice

01/05/24	EPK	Confer with A. Uetz and M. Lee regarding proposed extensions of Bankruptcy Code deadlines (.2); assign drafting of second motion to extend removal deadline to J. Harper (.1).	0.30	\$217.50
01/07/24	EPK	Follow up with J. Harper regarding second motion to extend removal deadline and factual background for same.	0.10	\$72.50
01/08/24	EPK	Address evidentiary issues related to second motion requesting extension of removal deadline.	0.20	\$145.00
01/08/24	JSH	Draft Second Motion for Extension of Removal Deadline.	0.80	\$492.00
01/09/24	EPK	Review drafts of second motion to extend removal deadline, notice of hearing, supporting declaration, and proposed order (.3); revise and provide comments to same (.4); coordinate with Foley restructuring team on preparation of second extension request for client review, approval, and filing by January 10, 2024 (.3).	1.00	\$725.00
01/09/24	JSH	Draft Second Motion for Extension of Removal Deadline and related filings (2.1); edit draft per E. Khatchatourian (.2).	2.30	\$1,414.50
01/09/24	SJM	Review motion to extend removal deadline (.7); email to P. Bongiovanni regarding motion and basis for extension (.4).	1.10	\$770.00
01/10/24	EPK	Follow up with client regarding approval of second motion to extend removal deadline for filing (.2); oversee and follow up on filing and service of same (.2).	0.40	\$290.00
01/10/24	JCH	Finalize Second Motion to Extend Time to File Removals, Declaration and Notice of Hearing for filing.	0.50	\$137.50
01/10/24	JSH	Finalize removal extension report.	0.20	\$123.00
01/10/24	SJM	Final review of motion to extend removal deadline in light of client approval (.3); email correspondence with J. Harper and J. Harrison regarding finalizing and filing motion (.2); email to KCC regarding service of motion (.1).	0.60	\$420.00

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01/17/24	MDL	Email correspondence with C. Restel regarding Committee certification on expert access order.	0.20	\$135.00
01/17/24	MDL	Evaluate Committee certification on expert access order for factual accuracy.	0.20	\$135.00
01/24/24	EPK	Assess whether and when a notice of non-opposition can be filed with respect to the pending motion to extend removal deadline.	0.20	\$145.00
01/24/24	SJM	Respond to E. Khatchatourian regarding timing for CNO as to removal deadline extension motion.	0.20	\$140.00
01/25/24	JCH	Prepare draft certificate of no objection to Second Motion to Extend Time to File Removals.	0.50	\$137.50
01/29/24	EPK	Follow up on filing of certificate of no objection relating to removal-deadline extension request and uploading of proposed order on same.	0.20	\$145.00
01/29/24	JCH	File certificate of no objection regarding Second Motion to Extend Time to file Notices of Removal.	0.10	\$27.50
01/29/24	SJM	Revise proposed order on motion to extend removal deadline based on court notice of defective form.	2.00	\$1,400.00
		Task Total:	11.10	\$7,072.00

035 General Counsel Matters

01/09/24	JRBL	Telephone conference with M. Schieble regarding various client tax matters.	0.80	\$920.00
01/09/24	LFG	Correspond with J. Blease and new tax counsel.	0.60	\$600.00
01/18/24	LFG	Calls with M. Lee, R. Medeiros and D. Cola regarding DRB meeting.	0.40	\$400.00
01/23/24	JRBL	Review property and governance matters in preparation for client meeting.	1.40	\$1,610.00
		Task Total:	3.20	\$3,530.00

038 Mediation

01/02/24	MR	Draft client update and recommendation regarding mediator selection in adversary proceeding.	0.50	\$282.50
01/03/24	AMUE	Review updated declarations for mediators in response to U.S. Trustee's comments to mediation motion.	0.90	\$765.00
01/04/24	AMUE	Telephone conference with B. Weisenberg regarding insurers' objection to mediation motion.	0.20	\$170.00
01/04/24	MCM	Continue working on analysis of other diocesan settlements in connection with preparation for mediation and plan negotiation.	1.00	\$700.00
01/04/24	MCM	Email correspondence regarding issues raised in objection to mediation motion and potential response to same.	0.40	\$280.00
01/04/24	SJM	Review draft declarations from mediation associates.	0.40	\$280.00
01/05/24	AMUE	Review updated declaration for 2 mediators in order to resolve U.S. Trustee objections to mediation motion.	0.80	\$680.00
01/05/24	AMUE	Draft recommendation for client regarding mediation issue.	0.40	\$340.00
01/05/24	SJM	Revise proposed order on mediation motion based on U.S. Trustee request (.2); email to Committee counsel regarding revision to proposed order (.1); call with B. Weisenberg and A. Uetz regarding approach to proposed order, supplemental declaration, and reply in support of mediation motion (.3); prepare notice of revised exhibits to mediation motion (.8); email correspondence with A. Uetz and B. Weisenberg regarding drafting of reply arguments (.2).	1.60	\$1,120.00
01/06/24	SJM	Research regarding treatment of mediators as professionals for reply brief in support of mediation motion (.4); analyze declaration of proposed mediators in order to respond to insurer arguments regarding inadequate disclosures (.6); begin drafting section for reply brief on adequacy of proposed mediator disclosures (.9).	1.90	\$1,330.00

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01/07/24	AMUE	Meeting with M. Moore, J. Blease, T. Carlucci, N. DeLuca and T. Raab to discuss A&M's claims analysis to prepare for mediation.	1.00	\$850.00
01/07/24	AMUE	Review communication received from P. Bongiovanni regarding possible mediators for insurance dispute (.3); respond to P. Bongiovanni (.2).	0.50	\$425.00
01/07/24	AMUE	First revisions to draft reply brief in support of motion for mediation.	0.90	\$765.00
01/07/24	EPK	Review portions of draft joint reply to insurers' objection to mediation motion (.1); comment on the Committee's proposed list of issues to be mediated as disputed issues between the debtor and the Committee (.3); correspond with C. Moore of A&M and senior Foley restructuring team regarding same (.2).	0.60	\$435.00
01/07/24	ERR	Edit reply in support of motion for mediation in main case.	0.70	\$612.50
01/07/24	MDL	Revise reply brief in support of mediation motion.	0.90	\$607.50
01/07/24	SJM	Continue drafting section regarding 2014(a) disclosures for reply to insurer objection to mediation motion (1.2); draft section regarding insurer proposed modifications to mediation order for reply brief (1.4); analyze draft reply brief to evaluate additional potential arguments in response (.8).	3.40	\$2,380.00
01/08/24	AMUE	Edit three turns of reply to insurers' objection to mediation motion (1.9); three email communications with B. Weisenberg regarding same (.6).	2.50	\$2,125.00
01/08/24	MDL	Strategize with A. Uetz regarding reply brief in support of mediation motion.	0.50	\$337.50
01/08/24	MDL	Telephone conference with M. Moore regarding detail points of claims analysis that will be relevant to mediation efforts.	0.40	\$270.00

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01/08/24	SJM	Revise reply in support of mediation motion to address comments from A. Uetz and Committee counsel and to comply with local rules and practice (.6); email correspondence with A. Uetz and B. Weisenberg regarding reply (.3); finalize reply for filing (.3); prepare chart of arguments in insurer objection to mediation motion for hearing preparation (2.1).	3.30	\$2,310.00
01/09/24	JRBL	Prepare for (.5) and make presentation to Steering Committee on claims summary and categorization for mediation purposes (1.5).	2.00	\$2,300.00
01/09/24	MDL	Prepare for hearing on motion to mediate.	1.00	\$675.00
01/10/24	SJM	Revise proposed mediation order in light of results of hearing and agreement between parties.	1.80	\$1,260.00
01/11/24	AMUE	Meeting with M. Kemner regarding case strategy as it relates to mediation.	0.50	\$425.00
01/11/24	EPK	Review update from A. Uetz regarding the hearing on the joint motion to appoint mediators.	0.20	\$145.00
01/11/24	ERR	Review issues regarding claim and coverage analysis in coordination with mediation scheduling and client reporting needs.	1.50	\$1,312.50
01/11/24	JRBL	Telephone conference with Foley team in preparation for mediation.	0.70	\$805.00
01/11/24	SJM	Draft notice of continued hearing on mediation motion (.4); further revise proposed mediation order to reflect separation of mediation matters and mediators for the Committee and insurers (1.3).	1.70	\$1,190.00
01/11/24	SJM	Attend case team call regarding mediation and strategy memo (.4); telephone call with A. Uetz regarding notice of continued hearing on mediation motion (.2); telephone call with courtroom deputy regarding potential designation of mediation continued hearing as Zoom only (.2); email to A. Uetz regarding future reserved hearing dates (.1).	0.90	\$630.00

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01/12/24	AMUE	Revisions to mediation order to account for insurance adversary proceeding (.5); email communication to M. Plevin and T. Schiavoni regarding insurance mediators (.2); review response received from M. Plevin (.1).	0.80	\$680.00
01/12/24	SJM	Email correspondence with A. Uetz regarding mediation order.	0.30	\$210.00
01/15/24	AMUE	Communication with P. Bongiovanni regarding mediation strategy.	0.30	\$255.00
01/15/24	AMUE	Revise mediation order to include insurance adversary proceeding provisions.	1.10	\$935.00
01/15/24	ERR	Edit language regarding proposed order regarding mediation.	0.30	\$262.50
01/15/24	SJM	Further revisions to proposed mediation order following comments by A. Uetz and Committee counsel (.3); prepare email to insurer counsel regarding revised proposed order (.6).	0.90	\$630.00
01/16/24	AMUE	Telephone conference with Judge Sontchi regarding things to cover with client leadership in planning for mediation (.4); email communications with P. Bongiovanni regarding things to cover with client leadership in preparation for mediation (.6); review email received from C. Moore regarding preparation for mediation (.2) and respond to same (.2); email communication with P. Bongiovanni regarding preparation for mediation (.2).	1.60	\$1,360.00
01/16/24	AMUE	Email to insurance counsel (M. Plevin and T. Schiavoni) regarding rates/declarations/availability of mediators suggested by insurers (.2); email to insurance counsel (M. Plevin and T. Schiavoni) to request comments to mediation order previously circulated (.2); multiple emails with B. Weisenberg regarding comments to mediation order previously circulated (.3); revisions to statement by Debtor submitting proposed mediation order (.6); review email received from T. Schiavoni regarding mediation order (.1); review email response from J. Prol to T. Schiavoni regarding selection of mediator (.2).	1.60	\$1,360.00

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01/16/24	ERR	Review issues regarding stipulation for mediator regarding insurance and issues regarding dismissal of Lexington.	0.60	\$525.00
01/16/24	ERR	Review issues status regarding mediation particularly regarding insurers in preparation for hearing.	0.60	\$525.00
01/16/24	MDL	Email exchange with B. Weisenberg (Lowenstein) regarding Committee certification on mediation proposed order.	0.50	\$337.50
01/16/24	MDL	Telephone conference with S. Moses regarding Committee certification on mediation proposed order.	0.50	\$337.50
01/16/24	SJM	Analyze insurer proposed mediation order (.9); draft detailed analysis of insurer changes in proposed mediation order (1.2).	2.10	\$1,470.00
01/16/24	SJM	Draft notice of revised proposed mediation order (.7); attend conference call with B. Weisenberg regarding approach to same (.2); email correspondence with A. Uetz and B. Weisenberg regarding approach to hearing on mediation order (.3); work on revisions to notice of revised order (.6).	1.80	\$1,260.00
01/17/24	AMUE	Communications with P. Bongiovanni regarding mediation meeting (.4); follow-up telephone meeting with Judge Sontchi regarding same (.3).	0.70	\$595.00
01/17/24	AMUE	Telephone conference with B. Weisenberg, J. Prol and M. Lee regarding further hearing on mediation motion.	0.40	\$340.00
01/17/24	AMUE	Telephone meeting with P. Bongiovanni and C. Moore for weekly strategy meeting, mostly focused on mediation.	0.90	\$765.00
01/17/24	EPK	Develop strategy with the Foley restructuring team regarding business judgment standards relevant to proposed mediation process (.5); review research summaries prepared by N. McGuffey relating to same (.6); formulate recommendations to the Foley team relating to mediation strategy (1.1).	2.20	\$1,595.00
01/17/24	ERR	Review materials to prepare for hearing on order regarding mediation.	0.80	\$700.00

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01/17/24	MCM	Email correspondence with Foley team regarding mediation issues and strategy related to same.	0.50	\$350.00
01/17/24	MDL	Prepare for (.2) and attend telephone conference with Lowenstein (J. Prol, B. Weisenberg) and Foley (E. Ridley, A. Uetz) regarding preparation for hearing on joint mediation motion (0.4).	0.60	\$405.00
01/17/24	MRM	Meet with M. Moore to discuss new research (.4); research instances of split mediators on different issues during mediation (.8).	1.20	\$564.00
01/17/24	SJM	Research regarding application of business judgment rule to debtor conduct of mediation (1.0); review Gallagher and Newsome declarations regarding disinterestedness in order to respond to A. Uetz regarding same (.5).	1.50	\$1,050.00
01/17/24	TFCA	Review chain of emails regarding Steering Committee and meeting with mediators, including background material.	0.70	\$840.00
01/18/24	ERR	Attend work stream coordination and review response to amended complaint in light of mediation talks.	0.50	\$437.50
01/18/24	JRBL	Telephone conference with P. Bongiovanni regarding approach to mediation.	0.50	\$575.00
01/18/24	MCM	Email correspondence regarding strategic memo and claims-review documents for client parties.	0.40	\$280.00
01/19/24	AMUE	Telephone conference with P. Bongiovanni regarding mediation.	0.30	\$255.00
01/20/24	AMUE	Telephone meeting with C. Moore regarding mediation strategy.	0.70	\$595.00
01/22/24	AMUE	Meeting with M. Kemner to discuss mediation strategy.	0.80	\$680.00
01/22/24	MDL	Telephone conference with B. Weisenberg (Lowenstein) and G. Albert (Keller) regarding request of Court to enter partial mediation order appointing four agreed-upon mediators.	0.50	\$337.50
01/23/24	ERR	Review order on mediation.	0.60	\$525.00
01/23/24	JRBL	Review court order regarding mediation (.1); develop strategy for client meeting regarding mediation (.3).	0.40	\$460.00

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01/23/24	MDL	Email exchange with B. Weisenberg (Lowenstein) regarding request for text order appointing mediators.	0.10	\$67.50
01/23/24	MDL	Analyze mediation order and parameters placed on mediation by Judge Lafferty.	0.30	\$202.50
01/23/24	MDL	Strategize with L. Glahn for mediation approach and claims challenges.	0.70	\$472.50
01/23/24	MDL	Revise letter to Court regarding request for text order appointing mediators.	0.20	\$135.00
01/23/24	SJM	Analyze entered mediation order to determine changes from proposed orders (.8); draft summary of same for case team (.7); respond to A. Uetz regarding implications of revised order provision on mediation confidentiality (.5); draft bullet points summarizing mediation order for client (.6); review differences between entered mediation order and Santa Rosa order (.7); email to A. Uetz summarizing comparison (.4).	3.70	\$2,590.00
01/24/24	AMUE	Meeting with P. Bongiovanni and C. Moore to discuss chapter 11 strategy particularly as it relates to mediation.	1.10	\$935.00
01/24/24	JRBL	Review claims information, memos and analysis in preparation for client meeting in preparation for mediation.	3.30	\$3,795.00
01/25/24	AMUE	Email communication with Judge Sontchi regarding initial meeting.	0.30	\$255.00
01/26/24	AMUE	Debrief strategy meeting with P. Bongiovanni, M. Kemner, R. Medeiros, J. Blease, E. Ridley and J. Blease to prepare for initial mediation meeting (partial).	3.90	\$3,315.00
01/26/24	JRBL	Conference with T. Carlucci to develop strategy in preparation for client meeting.	1.00	\$1,150.00
01/26/24	JRBL	Conference with P. Bongiovanni regarding strategy.	1.00	\$1,150.00
01/26/24	JRBL	Conference with M. Kemner and client team in preparation for mediation.	4.50	\$5,175.00
01/26/24	JRBL	Conference with Bishop Barber and client team regarding mediation preparation.	1.50	\$1,725.00

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01/26/24	TFCA	Prep with J. Blease for meetings at Chancery (1.0); meet with P. Bongiovanni and Foley team (1.0); meet with Leadership Team regarding strategy (4.5).	6.50	\$7,800.00
01/27/24	JRBL	Review new verdicts and settlements in preparation for mediation.	1.20	\$1,380.00
01/29/24	AMUE	Prepare for meeting with Judge Sontchi and J. Krivis.	0.80	\$680.00
01/29/24	JRBL	Telephone call with M. Lee and T. Carlucci regarding preparation for meditation.	0.90	\$1,035.00
01/29/24	MDL	Email correspondence with Bishop Barber, P. Bongiovanni, M. Kemner, and Foley attorneys (A. Uetz, J. Blease and T. Carlucci) regarding preparations for initial mediation session.	0.20	\$135.00
01/29/24	MDL	Follow-up telephone conference with P. Bongiovanni regarding Steering Committee meeting and necessary information for preparation for first mediation session.	0.10	\$67.50
01/29/24	MDL	Telephone conference with J. Blease and T. Carlucci regarding strategy for initial mediation session.	0.90	\$607.50
01/29/24	MDL	Telephone conference with P. Bongiovanni regarding upcoming Steering Committee meeting and preparation for first mediation session.	0.20	\$135.00
01/29/24	MDL	Telephone conference with A. Uetz regarding presentation for first mediation session.	0.30	\$202.50
01/29/24	TFCA	Telephone call with M. Lee and J. Blease regarding mediation prep.	0.90	\$1,080.00
01/30/24	JRBL	Conference with Bishop Barber and client team in preparation for mediation.	1.20	\$1,380.00
01/30/24	JRBL	Draft outline at client request for mediation meeting.	1.30	\$1,495.00
01/30/24	JRBL	Conference with M. Lee, T. Carlucci and L. Glahn in preparation for mediation.	0.50	\$575.00
01/30/24	JRBL	Prepare for meeting with mediators by outlining issues and coordinating with mediation team.	2.30	\$2,645.00

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01/30/24	LFG	Prepare for (1.8) and participate in calls with mediation team and clients to set strategy in preparation for mediator meeting (1.6).	3.40	\$3,400.00
01/30/24	MCM	Email and telephone conference with M. Lee regarding mediation and related case status issues.	0.50	\$350.00
01/30/24	MDL	Telephone conference with J. Blease, T. Carlucci, L. Glahn, M. Kemner, Bishop Barber, and P. Bongiovanni regarding subjects to cover with mediators at opening session.	1.60	\$1,080.00
01/30/24	MDL	Telephone conference with M. Kemner to discuss topics for opening mediation session.	0.30	\$202.50
01/30/24	MDL	Telephone conference with B. Weisenberg (Lowenstein) regarding mediation commencement, schedule, and subject areas for discussion.	0.30	\$202.50
01/30/24	MDL	Telephone conference with J. Blease, T. Carlucci, and L. Glahn regarding preparations for opening mediation session.	0.50	\$337.50
01/30/24	MDL	Draft list of agenda items for opening mediation session with mediators.	0.60	\$405.00
01/30/24	TFCA	Meet with J. Blease to discuss outline and prepare for meeting with client; (.5); meet for prep regarding meeting with mediators at Foley (.5); prep session regarding same with client (1.5); meet with L. Glahn regarding work on outline (.5).	3.00	\$3,600.00
01/31/24	AMUE	Email communication with J. Krivis (.3); prepare for meeting with Judge Sontchi and J. Krivis (.5); meet with client leadership (Bishop Barber, P. Bongiovanni and M. Kemner) and Foley team (M. Lee, J. Blease, L. Glahn and T. Carlucci) to prepare for mediation meeting with Judge Sontchi and J. Krivis (1.0); meeting with Judge Sontchi and J. Krivis and above client leadership and Foley team (1.5); debrief meeting with M. Kemner, P. Bongiovanni, J. Blease and T. Carlucci (1.0) (partial).	4.30	\$3,655.00
01/31/24	JRBL	Prepare for meeting with mediators by reviewing claims data and memoranda.	2.20	\$2,530.00

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01/31/24	JRBL	Conference with Bishop Barber, P. Bongiovanni, M. Kemner and Foley team in preparation for mediation.	1.00	\$1,150.00
01/31/24	JRBL	Post-mediation meeting with client.	2.00	\$2,300.00
01/31/24	JRBL	Conference with mediators.	1.50	\$1,725.00
01/31/24	LFG	Prepare for and participate in meeting between clients and mediators.	1.40	\$1,400.00
01/31/24	LFG	Prepare for (.8) and participate in meetings with clients to prepare talking points for first meeting with mediators (1.0).	1.80	\$1,800.00
01/31/24	LFG	Prepare strategic talking points for mediator meeting.	1.20	\$1,200.00
01/31/24	MCM	Email and telephone conference with M. Lee regarding mediation and related case status issues.	0.50	\$350.00
01/31/24	MDL	Telephone conference with M. Kemner regarding strategy for opening mediation session.	0.10	\$67.50
01/31/24	MDL	Telephone conference with A. Uetz regarding strategy for opening mediation session.	0.20	\$135.00
01/31/24	MDL	Meet with Judge Sontchi and J. Krivis for opening mediation session.	1.40	\$945.00
01/31/24	MDL	Meeting with M. Kemner, P. Bongiovanni, and Foley team to prepare for opening mediation meeting with Judge Sontchi and J. Krivis.	1.00	\$675.00
01/31/24	TFCA	Review revised outline and comments regarding same (.4); prep with J. Blease for meeting (1.0); meet with professional team to prepare for meeting with mediators and client (1.0); attend meeting with mediators (1.5); attend post-meeting strategy session (2.0).	5.90	\$7,080.00
		Task Total:	133.90	\$122,079.00
		Services Total:	875.30	\$600,398.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Dania Abbasi	DAAB	Associate	26.00	\$500.00	\$13,000.00
Joseph S. Harper	JSH	Associate	9.00	\$615.00	\$5,535.00
Mason Roberts	MR	Associate	40.70	\$565.00	\$22,995.50
Mary Rofaeil	MRL	Associate	83.80	\$470.00	\$39,386.00
Mikaela R. Mitcham	MRM	Associate	22.30	\$470.00	\$10,481.00
Nora McGuffey	NMCG	Associate	3.30	\$470.00	\$1,551.00
Shane J. Moses	SJM	Of Counsel	50.60	\$700.00	\$35,420.00
Janelle C. Harrison	JCH	Paralegal	30.20	\$275.00	\$8,305.00
Kerry A. Farrar	KAFA	Paralegal	81.80	\$375.00	\$30,675.00
Ann Marie Uetz	AMUE	Partner	85.50	\$850.00	\$72,675.00
Benjamin J. Morris	BJMO	Partner	2.30	\$750.00	\$1,725.00
Emil P. Khatchatourian	EPK	Partner	54.90	\$725.00	\$39,802.50
Eileen R. Ridley	ERR	Partner	41.30	\$875.00	\$36,137.50
Jonathan P. Witt	JPWI	Partner	4.40	\$725.00	\$3,190.00
Jeffrey R. Blease	JRBL	Partner	75.00	\$1,150.00	\$86,250.00
Lisa F. Glahn	LFG	Partner	14.70	\$1,000.00	\$14,700.00
Matthew D. Lee	MDL	Partner	69.50	\$675.00	\$46,912.50
Mark T. Schieble	MTSC	Partner	2.60	\$1,050.00	\$2,730.00
Thomas F. Carlucci	TFCA	Partner	35.70	\$1,200.00	\$42,840.00
Alan R. Ouellette	AROU	Senior Counsel	14.60	\$750.00	\$10,950.00
Mark C. Moore	MCM	Senior Counsel	59.80	\$700.00	\$41,860.00
Daniyal M. Habib	DMH	Special Counsel	54.00	\$450.00	\$24,300.00
Tamar N. Dolcourt	TND	Special Counsel	13.30	\$675.00	\$8,977.50
Totals			875.30		\$600,398.50

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$4,515.40
LSS - eDiscovery Services	\$3,600.00
Recording / Filing Fees	\$571.00
Expenses Incurred Total	\$8,686.40

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

Expense Detail

Electronic Legal Research Services

Date	Initials	Description	Amount
01/31/24	MCM	Westlaw. DOCKET REPORT. US JURY VERDICTS AND SETTLEMENTS DOC ACCESS. VSA VSA REPORT.	\$4,515.40

LSS - eDiscovery Services

Date	Initials	Description	Amount
01/31/24	JRBL	LSS - eDiscovery Services.	\$3,600.00

Recording / Filing Fees

Date	Initials	Description	Amount
01/31/24	JRBL	ACE ATTORNEY SERVICE, INC. - Special efilng on 10/03/23 - 10/20/23.	\$571.00

Expense Total: \$8,686.40



FOLEY & LARDNER LLP
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Paul B. Bongiovanni
Chief Financial Officer
Roman Catholic Bishop of Oakland
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: March 28, 2024
Invoice No.: 50810163
Our Ref. No.: 100845-0402

Services through February 29, 2024

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	\$556,880.50
Total Expenses:	\$5,472.50
Amount Due:	\$562,353.00

Please reference your invoice number 50810163 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of our invoice.

Federal Employer Number:
39-0473800

Professional Services Detail

003 Automatic Stay

02/01/24	EPK	Draft email communication to be sent to plaintiffs' firms that are ostensibly violating the automatic stay (.6); call with S. Moses to discuss strategy relating to enforcement of the stay (.4); post-call correspondence with S. Moses regarding communications to be sent to offending plaintiffs' firms (.2).	1.20	\$960.00
02/01/24	KAFA	Analysis of newly served complaints and comparison to filed proofs of claim to gather information for letter to claimant regarding violation of stay.	0.70	\$276.50
02/01/24	SJM	Telephone call with E. Khatchatourian regarding stay issues relating to recent service attempts in state court matters (.4); review state court filings in order to evaluate approach to stay issues (.8); email K. Farrar regarding same (.2); email to E. Khatchatourian regarding findings and recommended approach (.3).	1.70	\$1,275.00
02/04/24	EPK	Analyze additional violative services of process in AB 218 actions.	0.20	\$160.00
02/05/24	EPK	Confer with S. Moses regarding communication to plaintiffs' firms serving summonses in violation of the stay (.2); develop strategy regarding enforcement of the stay and communications to offending plaintiffs' firms (.7); email to the client team regarding proposed course of action (.1); follow up with S. Moses regarding admonishment letters transmitted today (.1).	1.10	\$880.00
02/05/24	SJM	Analyze documents from new attempted service of summons on debtor (.4); email correspondence with E. Khatchatourian regarding approach to same (.2); prepare letter to Gross & Belsky firm regarding violation of automatic stay (.8); prepare letter to Peiffer firm regarding same (.5).	1.90	\$1,425.00
02/07/24	EPK	Review email from P. Bongiovanni regarding additional summonses served at the Chancery, including review of attached litigation documents.	0.20	\$160.00

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02/08/24	EPK	Close review of additional stay-violating summonses received (.1); email to P. Bongiovanni and R. Medeiros regarding proposed handling of same (.2); review admonishment letters that were sent to the Gross & Belsky and Peiffer firms earlier this week (.2); confer with S. Moses regarding further actions to be taken to enforce the stay (.6); review proposed notices of stay to be filed in uncoordinated actions in Alameda County (.2); review correspondence with Gross & Belsky and Peiffer firms regarding stay violations (.2).	1.50	\$1,200.00
02/08/24	SJM	Analyze documents from new attempted service on RCBO (.3); email correspondence with E. Khatchatourian regarding approach to same (.3); email to W. Delvalle regarding preparation of notices of stay (.2); revise draft notices of stay (.4); email to E. Khatchatourian regarding language for addendum to notices of stay (.2); email plaintiffs' counsel regarding need for response on violation of stay (.3).	1.70	\$1,275.00
02/09/24	EPK	Develop strategy with S. Moses regarding recent stay violations and further efforts to enforce the stay (.6); review communications with T. Gross of the Gross & Belsky firm regarding stay violation notice (.1); follow up on filing of Superior Court notices of stay (.1).	0.80	\$640.00
02/09/24	SJM	Email to E. Khatchatourian regarding approach to call with T. Gross regarding stay violation (.2); telephone call with T. Gross regarding attempted service of complaint (.3); telephone call with E. Khatchatourian regarding follow-up from call with T. Gross (.1); respond to E. Khatchatourian regarding language for notice of stay (.1); finalize notices of stay for filing (.3); email to T. Gross confirming that further attempts at service will not happen (.2).	1.20	\$900.00
02/09/24	TFCA	Review motions to enforce stay.	0.20	\$265.00

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02/12/24	EPK	Review recent rulings in the JCCP 5108 proceeding and uncoordinated actions to assess impact on the automatic stay (.3); follow up on status of stay-enforcement communications with plaintiffs' firms (.4); draft internal status report regarding recent stay violations and results of communications with offending plaintiffs' firms (.7); follow-up email correspondence to Peiffer Wolf firm regarding stay violation (.1).	1.50	\$1,200.00
02/16/24	EPK	Review email from M. Rosadini-Knot of the Peiffer Wolf firm regarding stay violation notice (.1); confer with S. Moses regarding same (.1); responsive email to Peiffer Wolf firm acknowledging receipt of explanation for service of complaint in violation of stay (.1).	0.30	\$240.00
02/16/24	SJM	Review response from Peiffer firm to stay violation letter (.2); email to E. Khatchaturian regarding approach to same (.1); email to Peiffer firm confirming that further attempts to serve summons will not be made (.2).	0.50	\$375.00
Task Total:			14.70	\$11,231.50

004 Bankruptcy Litigation/Adversary Proceedings

02/02/24	EPK	Additional analysis of research summaries on "probate exception" to federal jurisdiction (.7); revise turnover demand letter to be sent to M. Zatkan of King, King & Zatkan regarding trust funds to be distributed to the bankruptcy estate (1.4); email to M. Lee regarding revised turnover demand letter (.1).	2.20	\$1,760.00
02/05/24	JCH	Confirm extended removal deadline.	0.20	\$60.00
02/26/24	EPK	Strategy call with M. Lee regarding Bennett Trust probate issues.	0.30	\$240.00
02/26/24	MDL	Telephone conference with E. Khatchaturian regarding strategy for handling Bennett Trust dispute including jurisdictional question.	0.30	\$240.00
Task Total:			3.00	\$2,300.00

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

02/01/24	JCH	Redact personal identifying information in filed abuse claims.	1.00	\$300.00
02/04/24	MCM	Email correspondence with Committee counsel and KCC regarding updated abuse-claims matrix and related issues.	0.40	\$330.00
02/05/24	MCM	Review updated abuse-claims matrix from KCC following Committee requests for same.	0.60	\$495.00
02/06/24	MCM	Review amended claims following dissemination of same by claims agent (0.3) and confirm receipt by Committee counsel of requested documents (0.1).	0.40	\$330.00
02/06/24	MRL	Confer with M. Moore regarding the updated the claims chart.	0.10	\$57.00
02/07/24	KAFA	Analysis of newly filed POC's and updated claims register received from KCC (1.0); update summary of claims (2.2).	3.20	\$1,264.00
02/07/24	MCM	Continue reconciliation of recently filed amended claims in RCBO bankruptcy.	0.40	\$330.00
02/08/24	MCM	Review amended and supplemented claims (0.3) and update claims-review accordingly following discussion with Committee (0.2).	0.50	\$412.50
02/09/24	MDL	Telephone conference with A. Uetz to evaluate claims objection strategy.	0.20	\$160.00
02/12/24	AMUE	Draft memorandum regarding review of certain sexual abuse claims to provide advice to client regarding same.	1.20	\$1,110.00
02/22/24	AMUE	Review claims with potentially exclusionary criteria.	0.60	\$555.00
02/22/24	MCM	Email correspondence with claims-review experts regarding amended/supplemented claims.	0.40	\$330.00
02/26/24	MRL	Finalize review of pending dioceses cases to provide an update on their status to the Foley team.	1.00	\$570.00
02/27/24	AMUE	Review documents regarding prior settlements between RCBO and sexual abuse claimants.	1.20	\$1,110.00

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02/27/24	KAFA	Provide information requested by Lowenstein regarding prior settlements of specific claimants.	0.60	\$237.00
02/29/24	MDL	Evaluate impact of state law ruling on statute of limitations defense to certain claims.	0.30	\$240.00
		Task Total:	12.10	\$7,830.50

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

02/01/24	JCH	Update daily docket report.	0.50	\$150.00
02/02/24	JCH	Finalize Notice of Continued Hearings (.4); file same (.1); update daily docket report (.2).	0.70	\$210.00
02/05/24	EPK	Provide comments to J. Harrison regarding critical case dates/deadlines tracker (.2); assess procedural and timing requirements relating to insurers' motion to withdraw the reference in Adv. Proc. 23-04028 (.1); review order enlarging deadline to remove actions (.1).	0.40	\$320.00
02/05/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
02/05/24	JSH	Update case timeline and slides in light of deadlines, docketing issues and local rules.	0.30	\$210.00
02/05/24	MRL	Summarize docket activity to circulate update to client.	0.60	\$342.00
02/08/24	EPK	Review new critical case dates and deadlines (.1); follow up on tracking and docketing of same (.1).	0.20	\$160.00
02/08/24	JCH	File core service list as of February 8, 2024 (.2); update daily docket report (.5).	0.70	\$210.00
02/09/24	JCH	Update Master Case Calendar & Timeline (.5); update daily docket report (.5).	1.00	\$300.00
02/11/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.40	\$228.00
02/12/24	EPK	Comment on incremental updates to the master case calendar and timing considerations related to the mediation process (.2); review recently entered bankruptcy court orders (.1).	0.30	\$240.00
02/12/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00

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02/12/24	JSH	Update weekly timeline and slides to reflect case developments and docket activity.	0.50	\$350.00
02/12/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.60	\$342.00
02/12/24	SJM	Email correspondence regarding process for calendaring Zoom appearance requests.	0.40	\$300.00
02/13/24	JCH	Update daily docket report.	0.50	\$150.00
02/13/24	MRL	Summarize docket activity to circulate to client.	0.40	\$228.00
02/14/24	JCH	Update daily docket report.	0.50	\$150.00
02/14/24	SJM	Respond to emails regarding status of October 18 transcript.	0.20	\$150.00
02/15/24	JCH	Update daily docket report.	0.50	\$150.00
02/15/24	JSH	Update weekly timeline and slides per case developments and docket activity.	0.10	\$70.00
02/16/24	JCH	Update daily docket report.	0.50	\$150.00
02/19/24	EPK	Review master case calendar (.1); evaluate need for additional administrative motions to extend critical case dates and deadlines (.1).	0.20	\$160.00
02/19/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
02/19/24	JSH	Update weekly timeline and slides per case developments and docket activity.	0.20	\$140.00
02/20/24	JCH	Update daily docket report.	0.50	\$150.00
02/20/24	MRL	Summarize docket activity to circulate update to client.	0.90	\$513.00
02/21/24	EPK	Review docket activity report and open items on Foley's internal task list.	0.20	\$160.00
02/21/24	JCH	Update daily docket report (.5); prepare Notice of Summary of Wages Expenses for January 2024 (.5); file monthly operating report for January 2024 (.2).	1.20	\$360.00
02/22/24	EPK	Address issues relating to monitoring of recurring Bankruptcy Code dates/deadlines for case reporting and assumption of contracts.	0.20	\$160.00

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02/22/24	JCH	Calendar continued hearing on CIGA's Motion to Dismiss.	0.20	\$60.00
02/22/24	JCH	Update daily docket report.	0.50	\$150.00
02/23/24	JCH	Update daily docket report.	0.50	\$150.00
02/25/24	MRL	Review pending dioceses cases to provide an update on their status to client.	0.50	\$285.00
02/26/24	EPK	Review updated case dates, deadlines, and task list (.2); comment on updated master case calendar (.2).	0.40	\$320.00
02/26/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
02/26/24	JSH	Update weekly timeline and slides per case developments and docket activity.	0.50	\$350.00
02/26/24	MRL	Summarize docket activity to circulate update to client.	0.40	\$228.00
02/27/24	EPK	Address issues relating to noticing and service issues to certain notice parties.	0.10	\$80.00
02/27/24	JCH	Update daily docket report.	0.50	\$150.00
02/28/24	JCH	Update daily docket report.	0.50	\$150.00
02/29/24	JCH	Update daily docket report.	0.50	\$150.00
02/29/24	MRL	Summarize docket activity to update client (1.1); review email from J. Harrison with RCBO docket update (.2).	1.30	\$741.00
Task Total:			22.60	\$10,067.00

007 Chapter 11 Plan/ Plan Confirmation

02/07/24	MRM	Research plans filed in other diocesan cases to inform strategy.	0.70	\$399.00
02/12/24	MCM	Email and telephone correspondence with Foley team regarding client call on Steering Committee debrief and related issues.	0.50	\$412.50

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02/12/24	MCM	Prepare information for call (.2); attend conference call with client parties to debrief recent Steering Committee presentation and strategize regarding open issues (.8).	1.00	\$825.00
02/15/24	TFCA	Telephone call with professionals to prepare for Steering Committee meeting (.7); meeting with Steering Committee regarding various issues (.4); review outline for meeting and provide comments (.2); follow up with A. Uetz regarding information for M. Kemner (.2).	1.50	\$1,987.50
02/20/24	AMUE	Draft agenda for SteerCo meeting (.5); draft strategy memorandum regarding SteerCo (.7).	1.20	\$1,110.00
02/20/24	MCM	Email correspondence with Foley team regarding recent developments in DRVC bankruptcy case (.3); review and analyze issues in connection with same (.5).	0.80	\$660.00
02/20/24	MDL	Email correspondence with L. Glahn regarding noneconomic terms for plan of reorganization.	0.10	\$80.00
02/20/24	MDL	Telephone conference with A. Uetz regarding potential non-economic plan terms.	0.20	\$160.00
02/20/24	TFCA	Review updates regarding Steering Committee agenda and strategy.	0.30	\$397.50
02/21/24	EPK	Review slide decks relating to prior Steering Committee meetings.	0.20	\$160.00
02/21/24	JCH	Prepare Steering Committee slide decks for Foley group.	0.20	\$60.00
02/22/24	AMUE	Review non-economic factors in plans of reorganization from other cases.	0.70	\$647.50
02/22/24	AMUE	Debrief meeting with T. Carlucci, J. Blease and M. Lee regarding SteerCo meeting.	0.40	\$370.00
02/22/24	AMUE	Attend SteerCo meeting to provide advice regarding mediation.	1.50	\$1,387.50
02/22/24	AMUE	Prepare for SteerCo meeting.	1.10	\$1,017.50
02/22/24	JRBL	Telephone conference with A. Uetz and T. Carlucci regarding wrap up from SteerCo meeting.	0.40	\$510.00
02/22/24	JRBL	Attend Steering Committee meeting in preparation for mediation.	1.50	\$1,912.50

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02/22/24	MDL	Attend and participate in RCBO Steering Committee meeting.	1.50	\$1,200.00
02/22/24	TFCA	Telephone call with J. Blease to prep regarding Steering Committee meeting (.3); attend Steering Committee meeting (1.5); follow up regarding meeting with A. Uetz, J. Blease, and M. Lee (.4).	2.20	\$2,915.00
02/26/24	JCH	Provide information regarding Plans and Disclosure Statements filed in other diocese bankruptcies for team.	1.00	\$300.00
02/26/24	MCM	Email correspondence with M. Lee regarding diocesan plan repository and updates to same.	0.20	\$165.00
02/26/24	MDL	Strategize regarding non-economic, channeling injunction, release, and defined terms of plan proposal.	0.80	\$640.00
Task Total:			18.00	\$17,316.50

008 Communications with Client

02/01/24	AMUE	Lead weekly strategy meeting with client leadership, Foley and A&M teams.	0.50	\$462.50
02/01/24	JRBL	Attend Foley and client check-in call.	0.50	\$637.50
02/01/24	LFG	Prepare for (.2) and participate in call with clients on case strategy and mediation (.5).	0.70	\$770.00
02/01/24	MDL	Prepare for (.2) and participate in weekly case update and strategy session with P. Bongiovanni, M. Kemner, Foley, A&M, and VeraCruz personnel (.5).	0.70	\$560.00
02/01/24	SJM	Telephone call with P. Bongiovanni regarding fee payment to BRG.	0.10	\$75.00
02/01/24	TFCA	Prepare for (.2) and attend telephone call with professionals and client (.5).	0.70	\$927.50
02/02/24	MCM	Email correspondence with client parties regarding letter received from abuse victim in connection with bankruptcy proceeding.	0.30	\$247.50
02/05/24	AMUE	Call with P. Bongiovanni regarding mediation strategy.	0.80	\$740.00

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02/06/24	AMUE	Weekly meeting with P. Bongiovanni and C. Moore to discuss strategy.	0.50	\$462.50
02/06/24	JRBL	Telephone conference with P. Bongiovanni and A. Uetz regarding updates and strategy.	0.80	\$1,020.00
02/07/24	AMUE	Email communication with M. Kemner regarding claims analysis.	0.50	\$462.50
02/08/24	JRBL	Telephone conference with A. Uetz and P. Bongiovanni regarding restructuring.	0.50	\$637.50
02/12/24	AMUE	Communications with M. Kemner and P. Bongiovanni regarding motion to withdraw the reference.	0.80	\$740.00
02/12/24	MDL	Email correspondence with R. Medeiros and M. Kemner regarding Committee inquiry on restricted versus unrestricted funds.	0.30	\$240.00
02/12/24	MDL	Telephone conference with R. Medeiros regarding use of funds to pay expenses related to CYO basketball league.	0.20	\$160.00
02/13/24	AMUE	Provide client with advice regarding filing of report concerning CTN interest.	0.40	\$370.00
02/13/24	AMUE	Analyze A&M workstreams with a goal to reduce debtor spend on certain items (.7); draft memorandum to client regarding same (.6).	1.30	\$1,202.50
02/13/24	AMUE	Meeting with M. Kemner to discuss possible savings on various workstreams.	0.50	\$462.50
02/13/24	AMUE	Draft lengthy email to client leadership regarding repurposing upcoming SteerCo agenda (.4); follow-up communication with client leadership regarding same (.3).	0.70	\$647.50
02/13/24	AMUE	Weekly strategy meeting with P. Bongiovanni and C. Moore.	0.70	\$647.50
02/14/24	AMUE	Finalize update for client leadership regarding case status and strategy.	0.80	\$740.00
02/14/24	AMUE	Meeting with P. Bongiovanni regarding reporting obligations (.5); email with M. Kemner regarding mediation strategy (.4).	0.90	\$832.50
02/15/24	MDL	Telephone conference with R. Medeiros regarding restricted nature of CYO basketball funds.	0.50	\$400.00

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02/15/24	MDL	Telephone conference with Fr. L. D'Anjou, R. Medeiros, and M. Kemner regarding CFO transition and mediation strategy.	0.30	\$240.00
02/16/24	AMUE	Telephone meeting with P. Bongiovanni regarding real estate issue.	0.50	\$462.50
02/16/24	TFCA	Telephone call with R. Medeiros regarding priest file request (.1) and draft email response regarding same (.1).	0.20	\$265.00
02/19/24	MDL	Email correspondence with P. Bongiovanni, M. Kemner, and C. Moore (A&M) regarding Committee diligence request on potential sale of Livermore property.	0.20	\$160.00
02/20/24	AMUE	Meeting with M. Kemner, J. Blease and T. Carlucci to discuss claims valuation.	0.90	\$832.50
02/20/24	MDL	Telephone conference with P. Bongiovanni, A&M (C. Moore, S. Loop), E. Khatchatourian (Foley) and M. Kemner regarding Livermore property and prospective sale of same.	0.50	\$400.00
02/20/24	MDL	Telephone conference with A. Uetz and M. Kemner regarding privilege issues with respect to parishes and NDCEs.	0.50	\$400.00
02/22/24	AMUE	Finalize memorandum to client regarding case strategy.	0.50	\$462.50
02/25/24	AMUE	Finalize memorandum to M. Kemner regarding other case outcomes.	0.70	\$647.50
02/26/24	AMUE	Email communication with M. Kemner regarding other case outcomes.	0.40	\$370.00
02/28/24	AMUE	Draft summary update for client regarding mediation status and next steps.	1.10	\$1,017.50
		Task Total:	19.50	\$18,702.50

009 Corporate Governance and Board Issues

02/01/24	EPK	Correspond with M. Lee regarding current status of CTN financial disclosure issues and related asset analysis.	0.30	\$240.00
02/01/24	EPK	Email correspondence with J. Witt and M. Lee regarding analysis of CTN's corporate structure.	0.20	\$160.00

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02/02/24	EPK	Review email from P. Bongiovanni regarding summary of CTN corporate structure and governance (.1); confer with Foley team regarding same (.3); revise summary (.3); email to P. Bongiovanni providing high-level summary of CTN corporate structure and governance features (.1).	0.80	\$640.00
02/05/24	EPK	Email correspondence with A. Uetz and M. Lee regarding CTN financial disclosure and protective order issues (.2); telephone conference with A. Uetz to discuss RCBO's relationships/transactions with CCCEB and CTN (.5).	0.70	\$560.00
02/05/24	EPK	Review material agreement with non-debtor affiliate (.5); analyze confidentiality obligations set forth in same (.3).	0.80	\$640.00
02/06/24	EPK	Analyze material provisions of CTN contractual arrangements (.2); email to A. Uetz summarizing same (.2).	0.40	\$320.00
02/07/24	AMUE	Two email communications with R. Medeiros regarding Stonebridge audit (.3); review 2023 audit response in order to provide further response to Sontebidge (.3).	0.60	\$555.00
02/08/24	AMUE	Telephone meeting with W. Smith regarding CTN disclosure (.5); strategize regarding CTN asset (.7).	1.20	\$1,110.00
02/16/24	EPK	Calls with P. Bongiovanni regarding FCC license issues relating to CTN membership (.2); email to P. Bongiovanni regarding additional details relating to same (.1).	0.30	\$240.00
02/18/24	EPK	Email correspondence with P. Bongiovanni and executive director of CTN regarding FCC registration update.	0.10	\$80.00
02/19/24	EPK	Review email from P. Bongiovanni regarding FCC ownership update relating to CTN interest (.1); email correspondence with CTN's FCC counsel, D. Balaguer, of Fish & Richardson regarding same (.1).	0.20	\$160.00

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02/22/24	EPK	Evaluate bankruptcy-specific information to be included in the FCC registration update relating to the CTN membership interest (.2); email correspondence with CTN's FCC counsel, D. Balaguer of Fish & Richardson, and F. Covarrubias of RCBO, regarding same (.2).	0.40	\$320.00
02/23/24	EPK	Address issues related to the processing of FCC registration update in connection with RCBO's membership interest in CTN (.3); email correspondence with D. Balaguer of Fish & Richardson regarding same (.3).	0.60	\$480.00
02/24/24	EPK	Review correspondence from P. Bongiovanni regarding review of FCC application relating to CTN membership.	0.10	\$80.00
02/25/24	EPK	Preliminary review of draft of FCC application regarding change in control prepared by D. Balaguer of Fish & Richardson.	0.40	\$320.00
02/26/24	EPK	Email correspondence with D. Balaguer of Fish & Richardson regarding comments to the FCC change-of-control application relating to CTN membership interest (.5); review nature and scope of CTN membership interest (.1).	0.60	\$480.00
02/28/24	EPK	Review Articles of Incorporation for CTN (.2); confer with J. Witt and M. Kiel regarding analysis of certain aspects of same (.5); revise FCC application descriptions relating to bankruptcy events (.4); email correspondence with D. Balaguer of Fish & Richardson regarding approval of FCC application for filing (.2).	1.30	\$1,040.00
02/28/24	JPWI	Respond to inquiry regarding FCC application regarding disclosure of interest in CTN.	0.80	\$640.00
02/28/24	MSK	Analysis of Financial Statements and Articles of Incorporation of CTN in connection with FCC application process (.6); exchange correspondence (multiple) with E. Khatchaturian and J. Witt regarding description of RCBO's interests in CTN in connection with FCC application (.3).	0.90	\$697.50
		Task Total:	10.70	\$8,762.50

010 Vendor Issues

02/13/24	EPK	Email correspondence with P. Bongiovanni and the A&M team regarding IT vendor invoice payment issues.	0.20	\$160.00
02/14/24	EPK	Address issues regarding IT vendor invoice payments and assessed finance charges.	0.40	\$320.00
		Task Total:	0.60	\$480.00

011 Cash Management

02/01/24	EPK	Address parish bank account issues relating to restricted assets (.3); review correspondence relating to same (.2); review conclusions from prior restricted cash analysis (.5); evaluate resulting trust arguments relating to same (.2).	1.20	\$960.00
02/01/24	MDL	Email correspondence with U.S. Trustee (J. Blumberg) and Lowenstein (J. Prol, B. Weisenberg) regarding block notice of RCC interest payments under cash management order.	0.10	\$80.00
02/01/24	MDL	Analyze revised schedule of church bank account disclosures.	0.10	\$80.00
02/01/24	MDL	Email correspondence with U.S. Trustee (J. Blumberg) and Lowenstein (J. Prol, B. Weisenberg) regarding bank account disclosures notice.	0.10	\$80.00
02/05/24	MDL	Email exchange with Lowenstein (J. Prol, B. Weisenberg) regarding rent payments to CCCEB.	0.10	\$80.00
02/05/24	MDL	Email correspondence with P. Bongiovanni regarding notice of RCC interest payments for 2024.	0.10	\$80.00
02/05/24	MDL	Email exchange with U.S. Trustee's office (J. Blumberg) and Lowenstein (J. Prol, B. Weisenberg) regarding notice of RCC interest payments for 2024.	0.10	\$80.00

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02/12/24	EPK	Review correspondence from M. Lee regarding the Committee's inquiries regarding RCBO's use of certain funds and restricted-asset issues (.2); coordinate with C. Moore of A&M regarding strategy relating to same (.2).	0.40	\$320.00
02/15/24	EPK	Foley team correspondence regarding proper use of funds restricted for youth sports programs.	0.30	\$240.00
02/15/24	MDL	Email exchange with Foley personnel (A. Uetz, M. Moore, E. Khatchaturian, S. Moses) regarding restricted designation of CYO basketball funds.	0.30	\$240.00
02/15/24	SJM	Research regarding Ninth Circuit test for use of funds in the ordinary course (.4); analyze application of ordinary course test to youth basketball league expenses and participation fees (.3); email to case team regarding same (.3).	1.00	\$750.00
02/16/24	EPK	Strategy call with C. Moore and S. Loop of A&M and M. Lee regarding the Committee's diligence requests regarding cash expenditures and restricted-asset issues.	0.30	\$240.00
02/16/24	MDL	Telephone conference with A&M (C. Moore, S. Loop) and Foley (E. Khatchaturian) regarding follow-up to call with Committee on restricted funds and CCCEB payments and additional diligence items coming out of that call.	0.30	\$240.00
02/19/24	AMUE	Review updated cash forecast.	0.50	\$462.50
		Task Total:	4.90	\$3,932.50

013 Employee Issues

02/19/24	MDL	Email correspondence with R. Medeiros, P. Bongiovanni, and M. Kemner regarding former priest inquiry on SERP payments.	0.10	\$80.00
		Task Total:	0.10	\$80.00

015 Executory Contracts/ Lease Issues

02/07/24	EPK	Analysis of lease-related transactions with CCCEB (1.3); compile CCCEB issues list for consideration by the Foley team (.6).	1.90	\$1,520.00
02/09/24	JCH	Finalize and file Application for Entry of Corrected Order.	0.50	\$150.00
02/09/24	SJM	Prepare application to correct order extending time to assume or reject CCCEB lease.	0.60	\$450.00
02/22/24	SJM	Email to case team regarding upcoming deadline to assume or reject CCCEB lease and approach to same.	0.30	\$225.00
02/25/24	EPK	Follow up with M. Lee and S. Moses regarding next extension of Cathedral lease assumption deadline.	0.20	\$160.00
02/25/24	JSH	Work on third motion to extend assumption/rejection deadline.	1.60	\$1,120.00
02/25/24	MDL	Provide instruction to S. Moses and E. Khatchatourian regarding motion to further extend deadline for assuming or rejecting CCCEB lease.	0.20	\$160.00
02/25/24	SJM	Review most recent motion for extension of time to assume CCCEB lease (.2); email to J. Harper regarding preparation of motion for further extension (.2).	0.40	\$300.00
02/26/24	EPK	Comment on drafts of second stipulation with CCCEB to extend Section 365 lease-assumption deadline (.3); confer with A. Uetz and S. Moses regarding form of stipulation and moving papers for same (.3); comment on motion for extension of lease deadline and supporting declaration (.6).	1.20	\$960.00
02/26/24	JSH	Draft third motion to extend assumption/rejection deadline and associated papers for motion.	2.00	\$1,400.00

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02/26/24	SJM	Prepare stipulation with CCCEB regarding further extension of time to assume Cathedral lease (.8); revise stipulation based on comments from E. Khatchatourian (.3); email to P. Bongiovanni regarding stipulation and forthcoming motion to extend time to assume (.2); revise draft motion to extend deadline to assume CCCEB lease (1.7); email to P. Bongiovanni regarding draft motion (.2).	3.20	\$2,400.00
02/27/24	EPK	Follow up on client review/approval and filing of third motion to extend Section 365 assumption/rejection deadline for Cathedral lease.	0.20	\$160.00
02/27/24	MDL	Edit motion to extend lease assumption deadline papers.	0.40	\$320.00
02/27/24	SJM	Email correspondence with P. Bongiovanni and president of CCCEB regarding stipulation and motion to extend time to assume Cathedral lease (.3); telephone call with M. Lee regarding motion (.1).	0.40	\$300.00
02/28/24	EPK	Email correspondence with Fr. Macadaeg of CCCEB regarding approval of stipulation to extend deadline to address the Cathedral lease in the bankruptcy case.	0.10	\$80.00
Task Total:			13.20	\$9,705.00

016 General Case Strategy (includes team calls)

02/01/24	AMUE	Lead weekly strategy meeting with Foley and A&M teams.	0.50	\$462.50
02/01/24	ERR	Conference call with team regarding status of workstreams and preparation for insurer mediation.	0.50	\$487.50
02/01/24	JRBL	Attend Foley and A&M check-in call.	0.50	\$637.50
02/01/24	LFG	Prepare for (.2) and participate in call with bankruptcy team on case strategy and mediation (.5); call with A. Uetz on same (.5).	1.20	\$1,320.00
02/01/24	MDL	Participate in weekly Foley-A&M strategy call.	0.50	\$400.00
02/01/24	SJM	Emails with M. Lee regarding plan strategy.	0.30	\$225.00

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02/01/24	TFCA	Telephone call with Foley and A&M teams.	0.50	\$662.50
02/02/24	AMUE	Work on case strategy regarding restricted and unrestricted gifts.	1.20	\$1,110.00
02/02/24	MDL	Strategize regarding pending motions, motions to be filed in coming weeks and months (.5), mediation strategy (.3), and outlining of plan terms (.3).	1.10	\$880.00
02/06/24	EPK	Strategize regarding stay issues and general restructuring strategy.	0.50	\$400.00
02/06/24	MRM	Review dockets for other diocesan matters (1.0); update case status chart (.8).	1.80	\$1,026.00
02/07/24	MRL	Confer with M. Moore regarding update on the case and the mediation process in order to update client.	0.40	\$228.00
02/08/24	TFCA	Telephone call with client and J. Blease regarding financial issues (.5); telephone call with M. Kemner, J. Blease and A. Uetz (.9); follow up with J. Blease regarding mediation strategy (.5).	1.90	\$2,517.50
02/12/24	MDL	Strategize regarding response to Committee's inquiry on restricted funds and CCCEB lease payments.	0.10	\$80.00
02/12/24	TFCA	Attend presentation of claims analysis to M. Kemner (.8); emails and telephone call with J. Blease regarding discussion regarding follow-up meeting (.3); review C. Moore's email regarding task changes regarding A&M (.2); review email from A. Uetz regarding claims analysis and objections issue (.4).	1.70	\$2,252.50
02/14/24	MRL	Email correspondence with the Foley team regarding the weekly update of case status for client summary.	0.10	\$57.00
02/15/24	AMUE	Meeting with M. Lee to discuss financial consultant workstream to achieve greater efficiency regarding certain tasks.	0.50	\$462.50
02/15/24	AMUE	Meeting with C. Moore, J. Blease and T. Carlucci to discuss strategies for greater efficiency regarding certain workstreams.	0.50	\$462.50

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02/15/24	AMUE	Review request from M. Kemner regarding outcomes in other chapter 11 cases (.2) and reply to same (.2).	0.40	\$370.00
02/15/24	EPK	Follow up on chapter 11 case developments in other pending diocesan bankruptcy cases to evaluate outcomes relevant to RCBO.	0.20	\$160.00
02/15/24	LFG	Participate in team strategy call.	0.50	\$550.00
02/15/24	MDL	Telephone conference with A&M (C. Moore, S. Loop) and Foley (E. Khatchaturian) regarding Committee questions on restricted funds and CCCEB payments.	0.80	\$640.00
02/15/24	MDL	Telephone conference with A. Uetz regarding near-term tasks relating to mediation prep and CFO transition.	0.50	\$400.00
02/15/24	MDL	Telephone conference with A. Uetz, J. Blease, and T. Carlucci regarding CFO transition, reduced scope of work for A&M, and mediation strategy.	0.50	\$400.00
02/15/24	MDL	Email exchange with A&M (S. Loop, C. Moore) and Foley (T. Dolcourt, A. Uetz) regarding projected cash situation.	0.20	\$160.00
02/15/24	MRL	Discuss providing an update on other dioceses cases (.5); review pending dioceses cases to provide an update on their status to the Foley team (2.1).	2.60	\$1,482.00
02/16/24	AMUE	Review issues concerning parish representation in other chapter 11 cases to respond to client's question.	0.40	\$370.00
02/16/24	MRL	Continue review of pending dioceses cases to provide an update on their status to the client.	1.20	\$684.00
02/16/24	TFCA	Review sex abuse verdict to provide information to claims team.	0.20	\$265.00
02/17/24	MRL	Finalize review of pending dioceses cases to provide an update on their status to the Foley team.	0.80	\$456.00
02/18/24	JRBL	Review reorganization plan for reduction of financial administration expenses (.3); communication with A. Uetz regarding suggested revisions (.3).	0.60	\$765.00

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02/18/24	MDL	Evaluate client case update and strategy memorandum to identify necessary monthly updates to same.	0.30	\$240.00
02/18/24	MDL	Revise task list requested by client with respect to transition of CFO duties.	0.30	\$240.00
02/19/24	AMUE	Reivew information summarized from other chapter 11 cases regarding representation of parishes.	0.70	\$647.50
02/20/24	JRBL	Draft email to team regarding claim valuations.	0.80	\$1,020.00
02/20/24	TFCA	Review response from public defender regarding priest file (.1) and follow up regarding same (.1).	0.20	\$265.00
02/21/24	EPK	Analyze regarding restricted cash analysis and general case strategy (.3); email correspondence with A&M team regarding same (.1).	0.40	\$320.00
02/21/24	MRL	Email correspondence with J. Harrison regarding updating the daily reports.	0.30	\$171.00
02/22/24	EPK	Email correspondence with M. Lee to coordinate with respect to outstanding Committee diligence and estate turnover issues.	0.10	\$80.00
02/22/24	TFCA	Review Rockville plan and follow-up emails with J. Blease, M. Moore and A. Uetz regarding various related issues (1.0); discuss concerns regarding term sheet regarding language related to credibly accused list with J. Blease (.3).	1.30	\$1,722.50
02/25/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.20	\$114.00
02/25/24	TFCA	Review settlement Excel spreadsheet prepared by M. Moore.	0.50	\$662.50
02/26/24	EPK	Coordinate with A. Uetz and M. Lee regarding strategy for certain Committee diligence inquiries and analysis of estate assets.	0.70	\$560.00
02/26/24	SJM	Prepare list of upcoming filings and hearings for A. Uetz.	0.40	\$300.00
02/27/24	MRL	Email correspondence with M. Moore regarding status update on the Buffalo Diocese case.	0.20	\$114.00
02/28/24	JRBL	Telephone conference with T. Carlucci regarding negotiation strategy.	0.50	\$637.50

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02/28/24	MRL	Review pending dioceses cases to provide an update on their status to the Foley team and the client.	0.50	\$285.00
02/29/24	AMUE	Meeting with C. Moore to discuss mediation strategy.	0.70	\$647.50
02/29/24	SJM	Assist with summary of Lloyd's appeal and related motions for weekly client update.	0.20	\$150.00
		Task Total:	31.00	\$28,549.50

017 Hearings and Court Matters

02/02/24	SJM	Draft status conference statement for February 7 status conference.	3.40	\$2,550.00
02/06/24	AMUE	Finalize case management statement in advance of hearing.	0.80	\$740.00
02/06/24	AMUE	Prepare for hearing on insurers' motion for clarification of Court's order regarding the Committee's 2004 motion seeking discovery from insurers.	1.20	\$1,110.00
02/06/24	ERR	Review materials in preparation for hearing before bankruptcy court.	0.90	\$877.50
02/06/24	SJM	Final revisions to status conference statement for 2/7 status conference.	0.60	\$450.00
02/06/24	SJM	Email correspondence with A. Uetz and E. Ridley regarding 2/7 hearings.	0.20	\$150.00
02/07/24	AMUE	Final preparation for hearing on motion to appoint fee examiner (.4), 2004 motion (.3) and status conference (.3).	1.00	\$925.00
02/07/24	AMUE	Attend hearing at 1:30 docket on motion to appoint fee examiner, motion to clarify Rule 2004 ruling and scheduling/status conferences.	2.00	\$1,850.00
02/07/24	ERR	Preparation for (1.0) and attendance at scheduling hearing before bankruptcy court (2.0).	3.00	\$2,925.00
02/07/24	SJM	Telephonically attend (for part) status hearing on motions to withdraw the reference and fee examiner motion.	0.80	\$600.00

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02/11/24	SJM	Emails to chambers regarding Zoom information for 2/12 hearings.	0.20	\$150.00
02/12/24	AMUE	Attend Court status conference regarding motions to withdraw the reference.	0.50	\$462.50
02/12/24	ERR	Prepare for hearing (.4); attend remote hearing regarding motions to withdraw reference and motions to dismiss by insurers and motion for clarification (.5).	0.90	\$877.50
		Task Total:	15.50	\$13,667.50

018 Non-Bankruptcy Litigation

02/24/24	LFG	Work on subpoena response.	0.30	\$330.00
		Task Total:	0.30	\$330.00

020 Retention/Billing/Fee Applications for Debtor Professionals

02/01/24	JCH	Finalize draft of Foley Second Interim Fee Application.	2.80	\$840.00
02/05/24	MDL	Draft insert to second interim fee application regarding Steering Committee work.	0.10	\$80.00
02/05/24	TND	Continue to prepare Foley's Second Interim Fee Application.	4.40	\$3,234.00
02/06/24	SJM	Email correspondence with T. Dolcourt regarding treatment of order on lease assumption deadline in fee application (.2); telephone calls with T. Dolcourt regarding timing for hearing on fee applications in light of fee examiner motion (.5); telephone call with G. Albert regarding same (.2); analyze proposed order on fee examiner motion to evaluate impact on timing for hearing on interim fee applications (.3).	1.20	\$900.00
02/06/24	TND	Further drafting of Second Interim Fee Application for Foley (5.1); discuss scheduling matters with S. Moses via telephone (2x) (.5); review proposed Fee Examiner Order to determine impact on hearings on Interim Fee Applications (.2); email to A. Uetz regarding same (.1).	5.90	\$4,336.50

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02/07/24	SJM	Email correspondence with case team regarding timing for fee application hearing in light of results of hearing on fee examiner motion (.4); email correspondence with G. Albert regarding same (.2).	0.60	\$450.00
02/07/24	TND	Analyze issues related to timing of fee app hearing based on fee examiner motion status (.2); email to S. Loop on timing of filing for Second Interim Fee Applications and proposed hearing date (.1).	0.30	\$220.50
02/08/24	SJM	Email to A. Uetz regarding time for fee application hearing (.1); telephone call with chambers regarding same (.1); email to G. Albert regarding same (.1).	0.30	\$225.00
02/08/24	TND	Review A&M First Interim Fee Application (.9); email correspondence with S. Loop on same (.2).	1.10	\$808.50
02/10/24	TND	Continue preparation of Foley Second Interim Fee Application.	0.60	\$441.00
02/12/24	JCH	Prepare certificates of no objection regarding Foley and A&M December 2023 monthly fee statements (.6); file same (.2).	0.80	\$240.00
02/12/24	SJM	Email correspondence with A&M regarding CNO for December monthly fee statements (.2); review CNOs for Foley and A&M monthly fee statements (.3); email to A. Uetz summarizing how fee examiner order could affect timing for hearing on interim fee applications (.5); coordinate regarding timing for hearing on interim fee applications in light of uncertainty regarding fee examiner order (.3).	1.30	\$975.00
02/12/24	TND	Provide revisions to Breall first interim fee application (1.6); review CNOs for December monthly statements (.2); add information to Foley Second Interim Fee Application (.2); emails with A&M regarding fee applications and other issues (.1); review email correspondence on hearing times (.1).	2.20	\$1,617.00
02/13/24	JCH	Calendar response deadline to Stout December 2023 monthly fee statement.	0.20	\$60.00

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02/13/24	SJM	Work on combined notice of hearing for interim fee applications (.6); email to J. Harrison regarding monthly statements filed in order to confirm list of anticipated fee applicants (.2); email to G. Albert regarding information needed for notice (.2); prepare email to P. Bongiovanni regarding scheduled payments on monthly fee applications (.4).	1.40	\$1,050.00
02/13/24	TND	Further revise Second Interim Fee Application (1.8); provide additional revisions and information to J. Breall on his fee application (.6); discuss noticing with S. Moses (.3); review email from S. Loop on December payments for monthly statements (.1).	2.80	\$2,058.00
02/14/24	EPK	Comment on certain project category descriptions for Foley's next Interim Fee Application.	0.40	\$320.00
02/14/24	JCH	Email correspondence with A. Uetz and T. Dolcourt regarding Foley Second Interim Fee Application.	0.80	\$240.00
02/14/24	SJM	Prepare detailed summary of motions to dismiss and responses for inclusion in fee application narrative.	0.40	\$300.00
02/14/24	SJM	Revise omnibus notice of hearing based on information from other professionals (.7); email correspondence with T. Dolcourt and A. Uetz regarding finalizing and filing fee applications and notice (.2); respond to emails regarding exclusion of counsel with minor roles (.2); email to G. Albert regarding timing of filings (.1).	1.20	\$900.00
02/14/24	TND	Discussions with J. Breall on filing First Interim Fee Application (.3); further revisions to Foley Second Interim Fee Application (2.9); discussions with S. Moses and A. Uetz on notice and timing (.2).	3.40	\$2,499.00
02/15/24	AMUE	Finalize Foley's second quarterly fee application.	3.50	\$3,237.50

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02/15/24	JCH	Email correspondence with Foley group regarding Foley Second Interim Fee Application (.5); review hearing transcripts and provide cites regarding Court's mention of A&M First Interim Fee Application (.8); final review of Foley interim fee application and Uetz Declaration (.5); file Foley Second Interim Fee Application and Uetz Declaration (.5); file A&M Second Interim Fee Application and Moore Declaration (.5); update and file Notice of Hearing on interim fee applications (.5).	3.30	\$990.00
02/15/24	SJM	Revise omnibus notice of hearing to reflect updated totals (.2); email to Committee counsel regarding notice (.2); coordinate service of notice of hearing and fee applications (.3).	0.70	\$525.00
02/15/24	TND	Finalize Second Interim Fee Application for Foley & Lardner (3.2); communications with S. Loop regarding A&M application (.4); email to J. Blumberg with LEDES and Excel backup files (.1).	3.70	\$2,719.50
02/16/24	TND	Email correspondence with P. Bongiovanni regarding filed interim fee applications and required notice of objection period.	0.20	\$147.00
02/19/24	TND	Discussion with A. Uetz regarding January fee statement.	0.20	\$147.00
02/20/24	TND	Begin preparation of Foley January fee statement to ensure compliance with UST guidelines.	0.80	\$588.00
02/21/24	SJM	Respond to A. Uetz regarding status of order on fee examiner motion.	0.20	\$150.00
02/21/24	TND	Further review of January fee statement to ensure compliance with U.S. Trustee Guidelines.	2.40	\$1,764.00
02/22/24	AMUE	Continue review of Foley's fee statement to ensure compliance with UST guidelines.	1.20	\$1,110.00
02/22/24	TND	Further preparation of January fee statement to ensure compliance with U.S. Trustee Guidelines.	4.10	\$3,013.50
02/23/24	TND	Further preparation of Foley January fee statement to ensure compliance with U.S. Trustee guidelines.	1.60	\$1,176.00

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02/26/24	JCH	Calendar response deadline to Breall & Breall January 2024 monthly fee statement (.2); email KCC's January 2024 monthly fee statement and new payment information to P. Bongiovanni (.2).	0.40	\$120.00
02/26/24	TND	Review A&M January fee application (.3); review prior notifications to parties regarding annual Foley increases (.6); email correspondence with Foley team regarding same (.2).	1.10	\$808.50
02/27/24	JCH	Prepare draft of Foley monthly fee statement for January 2024.	0.50	\$150.00
02/27/24	TND	Further review of issues regarding Foley annual fee increases.	0.20	\$147.00
02/28/24	AMUE	Revise monthly fee statement to ensure compliance with UST guidelines.	2.00	\$1,850.00
02/28/24	TND	Further work on January Foley fee statement to ensure compliance with U.S. Trustee guidelines.	0.90	\$661.50
02/29/24	JCH	Finalize draft of Foley monthly fee statement for January 2024 (.5); file Foley and A&M monthly fee statements for January 2024 (.5).	1.00	\$300.00
02/29/24	TND	Further revisions to January fee statement to ensure compliance with U.S. Trustee guidelines (1.6); review coversheet for monthly statement (.4); email correspondence with A&M regarding filing of January fee statement (.1).	2.10	\$1,543.50
Task Total:			62.30	\$42,942.50

021 Retention/Fee Applications: Ordinary Course Professionals

02/02/24	TND	Review issues related to OCP cap increase, including A&M analysis (.5); begin drafting motion to increase cap (.7).	1.20	\$882.00
02/03/24	TND	Email to IAS regarding OCP retention (.2); further work on OCP Cap increase motion (.3).	0.50	\$367.50
02/05/24	TND	Provide December 2023 Kemner invoice to counsel for U.S. Trustee and Committee (.2); call with M. Kemner regarding various OCP matters (.1); call and follow-up email with A&M team (S. Loop and C. Wiltgen) and A. Uetz on need for increased caps (.4).	0.70	\$514.50

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02/12/24	TND	Review information from IAS (.1); respond with questions on same (.1).	0.20	\$147.00
02/13/24	TND	Review Kemner OCP January invoice (.3); review updated information from IAS for OCP retention (.2).	0.50	\$367.50
02/16/24	TND	Circulate January Kemner invoice to Committee counsel and U.S. Trustee.	0.20	\$147.00
02/19/24	TND	Respond to inquiry from P. Bongiovanni regarding Kemner payment.	0.10	\$73.50
02/20/24	EPK	Review email from C. Wiltgen of A&M regarding January 2024 OCP payments.	0.10	\$80.00
02/20/24	TND	Review inquiry from A&M regarding OCP fee caps (.1); respond to same (.2).	0.30	\$220.50
02/21/24	EPK	Analysis of issues relating to recent OCP payments and compliance with OCP caps (.1); email correspondence with C. Wiltgen of A&M regarding same (.1).	0.20	\$160.00
02/21/24	TND	Correspondence with client, Foley, and A&M regarding payment of Kemner OCP invoices.	0.20	\$147.00
02/23/24	MDL	Correspondence with Lowenstein (B. Weisenberg, C. Restel) regarding VeraCruz January 2024 fees and expenses.	0.10	\$80.00
02/24/24	MDL	Email exchange with P. Bongiovanni regarding monthly OCP invoices for M. Kemner and VeraCruz.	0.10	\$80.00
Task Total:			4.40	\$3,266.50

022 Retention/Fee Applications: Other Professionals

02/02/24	JCH	Email correspondence with personnel at BRG regarding wire instructions for payment of fee statements.	0.50	\$150.00
02/05/24	JCH	Telephone call with representative from BRG regarding wire instructions (.2); telephone call with M. Kemner to confirm wire instructions (.2); review dockets and email to A. Uetz and M. Lee regarding BRG billing rates in San Francisco and Santa Rosa diocese bankruptcies (.2).	0.60	\$180.00

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02/07/24	TND	Review mediation order regarding method and timing of payment of mediator costs (.2); analyze Sontchi LLC monthly fee statement (.2); email correspondence with A. Uetz regarding same (.2).	0.60	\$441.00
02/14/24	JCH	Calendar response deadline and hearing date for interim fee applications of Committee's professionals.	0.50	\$150.00
02/20/24	TND	Prepare summary chart of interim fee applications for Committee professionals.	1.10	\$808.50
02/23/24	TND	Advise A. Uetz on process needed for mediators to submit bills.	0.10	\$73.50
02/26/24	TND	Email correspondence with A&M team regarding payment for mediators under Interim Comp order.	0.20	\$147.00
02/28/24	JCH	Calendar objection deadlines to Committee professionals' monthly fee statements for January 2024.	0.50	\$150.00
02/29/24	TND	Email correspondence with C. Wiltgen on W9 and payment information for mediator fee statements.	0.10	\$73.50
Task Total:			4.20	\$2,173.50

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

02/01/24	EPK	Email correspondence with the A&M team regarding CTN-reporting issues.	0.10	\$80.00
02/08/24	EPK	Review CTN Rule 2015.3 reporting notices (.2); call with A. Uetz regarding requests from CTN's counsel relating to reporting and disclosure issues (.3); email to counsel for CTN, W. Smith, regarding draft Rule 2015.3 report (.1).	0.60	\$480.00
02/13/24	AMUE	Telephone meeting with J. Blumberg regarding fee application timing.	0.20	\$185.00
02/13/24	EPK	Email correspondence with CTN's counsel, W. Smith of Binder Malter, regarding confidentiality issues relating to the CTN Rule 2015.3 report (.3); email correspondence with P. Bongiovanni and estate advisors regarding same (.3); coordinate with A. Uetz regarding strategy relating to same (.2).	0.80	\$640.00

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02/14/24	MDL	Provide instruction to J. Harper (Foley) and A&M team (S. Loop, C. Wiltjen) regarding U.S. Trustee request for updated insurance certificates.	0.10	\$80.00
02/15/24	EPK	Brief call with P. Bongiovanni regarding CTN bankruptcy reporting issues (.1); review correspondence from P. Bongiovanni regarding CTN and FCC registration issues (.1); email correspondence with counsel for CTN, W. Smith, regarding same (.3); confer with A. Uetz regarding CTN reporting issues and additional parties to be noticed relating to CTN interest (.2); address bankruptcy reporting and noticing issues concerning the Federal Communications Commission (.2); communications with FCC counsel to CTN, D. Balaguer of Fish & Richardson, regarding bankruptcy reporting and noticing issues (.5).	1.40	\$1,120.00
02/16/24	EPK	Provide instructions to the A&M team to revise and update the initial Rule 2015.3 report for CTN to prepare the same for filing next week (.2); email to P. Bongiovanni regarding revised report (.1).	0.30	\$240.00
02/19/24	AMUE	Review issue concerning CTN disclosure.	0.30	\$277.50
02/19/24	EPK	Email correspondence with P. Bongiovanni and C. Wiltgen of A&M regarding finalized initial CTN Rule 2015.3 Report and requisite notices prior to filing of same (.4); oversee filing and service of CTN report (.4); address issues regarding notice of same to be provided to CTN, Diocese of San Jose, and communications provider (.3).	1.10	\$880.00
02/20/24	EPK	Email correspondence with C. Wiltgen of A&M and P. Bongiovanni regarding review and approval of January MOR package (.4); follow up on filing and service of the CTN Rule 2015.3 report, including specific notice parties that should receive the report (.4); email correspondence with D. Cassidy of Alston & Bird regarding proposed filing version of the CTN Rule 2015.3 report (.2); cursory review of revised January MOR package (.1).	1.10	\$880.00
02/20/24	JCH	Finalize Rule 2015.3 Periodic Report (.4); file same (.1).	0.50	\$150.00

02/21/24	EPK	Comprehensive review of January MOR package and wages order reports to be filed with the MOR (.7); coordination call with P. Bongiovanni and A&M team regarding final review/approval of January MOR package (.5); revise explanatory footnotes to be included with January MOR (.1); oversee revisions to, finalization of, and filing of MOR and wages order reporting documents today (.9).	2.20	\$1,760.00
02/22/24	EPK	Email to counsel for the Committee and U.S. Trustee regarding wages order reporting and detailed summary of pre-petition expense reimbursements paid in January 2024.	0.20	\$160.00
02/25/24	MDL	Email correspondence with K. McAbee (U.S. Trustee's office) regarding U.S. Trustee's request for production of updated insurance certificates.	0.10	\$80.00
		Task Total:	9.00	\$7,012.50

026 Unsecured Creditor Issues/Communications/Meetings

02/01/24	MDL	Email exchange with C. Restel (Lowenstein) regarding status of Committee motion for protective order on proofs of claim.	0.10	\$80.00
02/07/24	AMUE	Review request from BRG regarding CTN information (.1) and respond to same (.2).	0.30	\$277.50
02/12/24	AMUE	Meeting with J. Prol and B. Weisenberg regarding their questions on payments to CCCEB and on restricted gifts.	0.80	\$740.00
02/12/24	MDL	Telephone conference with Lowenstein (J. Prol, B. Weisenberg) regarding Committee questions on restricted assets and CCCEB lease payments.	0.70	\$560.00
02/13/24	EPK	Coordinate with C. Moore of A&M and M. Lee regarding call this week with counsel to the Committee on restricted funds and CCCEB transactions.	0.30	\$240.00
02/13/24	MDL	Email exchange with BRG (M. Babcock), A&M (C. Moore), and Lowenstein (J. Prol, B. Weisenberg) regarding Committee questions on restricted funds and CCCEB lease payments.	0.20	\$160.00

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02/14/24	AMUE	Review issue raised by the Committee regarding CCCEB payments (.5); review issue raised by the Committee regarding use of unrestricted versus restricted cash (.4); provide direction to M. Lee regarding the Committee's comments to same (.3).	1.20	\$1,110.00
02/15/24	EPK	Strategy and coordination call with C. Moore and C. Wiltgen of A&M and M. Lee regarding CCCEB and restricted cash issues to be discussed with the Committee's legal team (.9); review chart of restricted/unrestricted accounts and balances prepared by C. Wiltgen of A&M (.1).	1.00	\$800.00
02/16/24	EPK	Conference call with counsel and financial advisors to the Committee regarding CCCEB, restricted cash issues, and funding estate operations going forward (.7); review email from C. Moore of A&M regarding list of issues identified by the Committee relating to same (.1).	0.80	\$640.00
02/16/24	MCM	Email correspondence with Committee counsel regarding bar date pleadings and related issues.	0.40	\$330.00
02/16/24	MDL	Telephone conference with Lowenstein (B. Weisenberg), BRG (P. Shields, M. Babcock), A&M (C. Moore, S. Loop), and Foley (E. Khatchatourian) regarding Committee questions on restricted vs. unrestricted funds and CCCEB payments.	0.60	\$480.00
02/19/24	AMUE	Review list of issues raised by the Committee regarding debtor assets (.4); follow up with P. Bongiovanni regarding same (.4).	0.80	\$740.00
02/21/24	AMUE	Meeting with M. Kaplan regarding request for review of certain documents.	0.20	\$185.00
02/26/24	MCM	Email correspondence with Committee counsel regarding information requests.	0.30	\$247.50
02/27/24	MCM	Email correspondence with Committee counsel regarding information requests and follow-up to same.	0.50	\$412.50

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02/28/24	MDL	Telephone conference with B. Weisenberg (Lowenstein), BRG (M. Babcock, A. Manley), S. Loop (A&M), and P. Bongiovanni regarding status of land use approvals for Livermore property owned by Adventus.	0.60	\$480.00
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Task Total:			8.80	\$7,482.50
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027 Real Estate and Real Property Issues

02/05/24	JRBL	Review news reports related to February 3-5 atmospheric river and Kirker Creek condition.	0.30	\$382.50
02/06/24	JRBL	Prepare sinkhole liability update.	0.50	\$637.50
02/13/24	TND	Revise real estate appraisal fee agreement.	0.60	\$441.00
02/16/24	AMUE	Review issue concerning sale of real estate.	1.10	\$1,017.50
02/16/24	MDL	Revise engagement letter for appraiser G. Downing.	0.20	\$160.00
02/16/24	TND	Call with M. Lee on Ginn Downing agreement (.3); call with P. Bongiovanni on same (.2); revise agreement per comments from P. Bongiovanni (.3).	0.80	\$588.00
02/20/24	EPK	Confer with J. Harper regarding research on "police and regulatory power" exemption from the automatic stay in connection with the sink hole issue at the Church of the Good Shepherd.	0.20	\$160.00
02/20/24	EPK	Call with P. Bongiovanni, M. Kemner, and Foley/A&M teams regarding disposition of Livermore property owned by Adventus (.5); review Livermore property documents provided by S. Loop of A&M (.2).	0.70	\$560.00
02/20/24	JSH	Call with E. Khatchaturian regarding police power research.	0.10	\$70.00
02/22/24	EPK	Review J. Harper's research summary regarding exemptions from the automatic stay (.2); confer with J. Harper regarding research findings (.2).	0.40	\$320.00
02/22/24	JSH	Research 362(b)(4) police power exception.	1.80	\$1,260.00
02/22/24	MDL	Evaluate documentation relating to Livermore property and potential sale of same.	0.30	\$240.00

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02/23/24	EPK	Review J. Harper's updated summary of case law assessing automatic stay exceptions.	0.20	\$160.00
02/23/24	JSH	Draft analysis of 362(b)(4) research regarding automatic stay exceptions.	1.20	\$840.00
		Task Total:	8.40	\$6,836.50

028 Tort Claims

02/06/24	JRBL	Evaluation of tort claims in preparation for client-requested call.	1.80	\$2,295.00
02/07/24	JRBL	Analysis of tort claim valuation in preparation for client call.	1.70	\$2,167.50
02/12/24	KAFA	Update litigation tracker.	0.70	\$276.50
02/16/24	EPK	Confer with S. Moses and K. Farrar regarding coordination and reassignment of individual Superior Court actions.	0.20	\$160.00
02/16/24	KAFA	Prepare update on 2022 request for information and documents by Arizona investigator Werboff regarding RCBO credibly accused priest due to further current request by Arizona investigator Moss (.3); analysis of John Doe OK 1161 Notice of Entry of Dismissal (.1); check JCCP 5108 docket for additional dismissals for cases naming the Diocese of Oakland (.2); update summary of abuse claims & cases (1.9); review notice of case reassignment filed in the Alameda Superior Court for John Doe 1022 RCBO case and summarize same for team (.2).	2.70	\$1,066.50
02/22/24	KAFA	Update summary of abuse claims and cases.	1.40	\$553.00
02/23/24	AROU	Respond to inquiry from counsel for co-defendant regarding claim.	0.20	\$160.00
02/23/24	JRBL	Investigate issues related to fraudulent claims filed in multiple jurisdictions by a single alleged victim based upon the same alleged conduct.	0.80	\$1,020.00
02/26/24	EPK	Confer with A. Ouellette regarding recently released joint CMC statement in the JCCP 5108 (.1); evaluate nature of bellwether cases reflected in same (.2).	0.30	\$240.00

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02/28/24	AROU	Review status of abuse action pending in Santa Barbara Superior Court.	0.30	\$240.00
02/28/24	EPK	Confer with A. Ouellette and S. Moses regarding status of the Martinez v. Franciscan Friars of California case and whether it is now coordinated in the Southern California JCCP (.3); observe virtual CMC in the JCCP 5108 proceedings to assess any impacts on bankruptcy estate insurance policies (.8).	1.10	\$880.00
Task Total:			11.20	\$9,058.50

029 Non-tort Proofs of Claim

02/04/24	MDL	Evaluate trade claims register following Committee request for same.	0.10	\$80.00
02/04/24	MDL	E-mail correspondence to Lowenstein regarding trade claims register.	0.10	\$80.00
02/05/24	MDL	Email exchange with B. Clark (Lowenstein) regarding trade claims register.	0.30	\$240.00
Task Total:			0.50	\$400.00

031 Insurance Issues (coverage, includes adversary proceeding)

02/01/24	ERR	Review insurers' motions to dismiss amended adversary complaint.	0.80	\$780.00
02/01/24	SJM	Review email from Court regarding continuance of CIGA motion to dismiss (.1); email correspondence with case team regarding approach to same (.2).	0.30	\$225.00
02/02/24	ERR	Briefly review motion to remove reference regarding adversary proceeding.	0.80	\$780.00
02/05/24	AMUE	Review summary of responses to amended complaint filed by Travelers, Westport, Pacific Indemnity, and Westchester Fire (.7); communication with E. Ridley and M. Lee regarding motion to withdraw the reference (.4).	1.10	\$1,017.50
02/05/24	DMH	Revise matrix of insurance coverage based on recent responses to tenders by Chubb.	1.30	\$617.50

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02/05/24	ERR	Edit report regarding pending adversary proceeding motions.	0.60	\$585.00
02/05/24	MDL	Evaluate arguments opposing insurers' motions to withdraw the reference.	0.10	\$80.00
02/05/24	MR	Review insurers' motion to withdraw the reference in adversary proceeding.	0.40	\$276.00
02/05/24	SJM	Draft section on motions to withdraw the reference for email to clients regarding status of insurer responses to third amended complaint (.6); email to E. Ridley summarizing response deadlines for motions to dismiss (.3).	0.90	\$675.00
02/06/24	MRL	Email correspondence with the Foley team regarding the motion to withdraw reference filed by the defendants.	0.30	\$171.00
02/07/24	MRL	Review local rules regarding the Motion to Withdraw the Reference (.5); analyze the Defendants' Motions to Withdraw the Reference (2.6); email correspondence regarding the same (.2).	3.30	\$1,881.00
02/07/24	SJM	Review research from Committee and M. Rofaeil regarding timing for responses to motions to withdraw the reference (.4); email to case team regarding same (.1); analyze district court dockets regarding motions for withdrawal of the reference (.5); email correspondence with A. Uetz regarding process for withdrawal of the reference (.5).	1.50	\$1,125.00
02/08/24	AMUE	Meeting with J. Prol and B. Weisenberg regarding motion to withdraw the reference.	0.50	\$462.50
02/08/24	EPK	Assess status of pending motions to withdraw the reference in the insurance adversary proceeding.	0.20	\$160.00
02/08/24	ERR	Review case law regarding analysis of motion to withdraw reference.	0.90	\$877.50
02/08/24	ERR	Attend conference call with Foley team reviewing issues as to response to motion to withdraw reference.	0.60	\$585.00
02/08/24	JCH	Review diocese bankruptcies and pull copies of responses filed to Motions to Withdraw Reference.	0.80	\$240.00

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02/08/24	KRD	Correspondence with E. Ridley and A. Uetz regarding pending motions in the adversary proceeding.	0.10	\$68.50
02/08/24	MRL	Analyze the motions to withdraw the reference (1.0); research the standard for motion to withdraw the reference (1.6); email correspondence regarding the same (.3); call with the Foley team (.6); confer with A. Uetz regarding the response to the motions to withdraw the reference (.2); begin drafting the response to the motions to withdraw the reference (2.3).	6.00	\$3,420.00
02/09/24	AMUE	Prepare for meeting with counsel for insurers regarding motion to withdraw the reference (.3); meeting with counsel for insurers and the Committee regarding motion to withdraw the reference (.4); review summary of research regarding motion to withdraw the reference (.5); draft recommendation to client leadership regarding motion to withdraw the reference (.9).	2.10	\$1,942.50
02/09/24	DMH	Prepare for (.3) and attend call with K. Dedrickson and M. Roberts to strategize approach for drafting responses to insurers' motions to dismiss (.4).	0.70	\$332.50
02/09/24	ERR	Telephone call with J. Breall regarding coordination of adversary proceedings.	0.50	\$487.50
02/09/24	ERR	Review strategy regarding opposing motions to dismiss by insurers.	0.60	\$585.00
02/09/24	ERR	Revise report to client regarding recommendations as to motion to withdraw reference by insurers.	0.50	\$487.50
02/09/24	KRD	Strategize regarding motions to dismiss and withdraw the reference.	0.40	\$274.00
02/09/24	KRD	Call with D. Habib and M. Roberts regarding strategy for opposing motions to dismiss in the adversary proceeding (.4); correspondence with D. Habib and M. Roberts regarding strategy for opposing motions to dismiss (.2).	0.60	\$411.00

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02/09/24	KRD	Review motion to withdraw the reference (.2); review CIGA's renewed motion to dismiss (.3); review primary insurers' renewed motion to dismiss (.2); review excess insurers' renewed motion to dismiss (.5).	1.20	\$822.00
02/09/24	MR	Attend strategy call with K. Dedrickson and D. Habib regarding responses to insurers' motions to dismiss in adversary proceeding.	0.40	\$276.00
02/09/24	MRL	Meeting with the Foley team to discuss response to motions to dismiss and to withdraw the reference (.4); draft email to the client regarding a response to the motions to withdraw the reference (1.4); draft responses to the motions to withdraw the reference (1.8); draft memorandum regarding the motions to withdraw the reference (.5).	4.10	\$2,337.00
02/11/24	MRL	Finalize responses to the motion to withdraw the reference.	0.40	\$228.00
02/12/24	AMUE	Review email received from Ms. Daniels regarding motion to withdraw the reference (.1) and respond to same (.2).	0.30	\$277.50
02/12/24	AMUE	Meeting with counsel for insurers who filed or joined motions to withdraw the reference and with counsel for Committee regarding the motions.	0.30	\$277.50
02/12/24	DMH	Analyze motions to dismiss filed by primary insurers, excess insurers, and CIGA, to outline substantive responses.	2.70	\$1,282.50
02/12/24	ERR	Prepare for call (.2); attend conference call with insurer counsel and Committee counsel regarding issues related to motions for withdrawal (.3).	0.50	\$487.50
02/12/24	ERR	Edit responses to motions to withdraw reference to bankruptcy court regarding adversary proceeding.	0.80	\$780.00
02/12/24	MR	Attend call with counsel for insurers and the Committee regarding motion to withdraw the reference in the adversary proceeding.	0.40	\$276.00
02/12/24	MRL	Research regarding the bankruptcy withdrawal filing in the district court (.8); update draft email to the client with the holding from the hearing (.6).	1.40	\$798.00

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02/12/24	SJM	Review District Court dockets in order to respond to question from A. Uetz regarding status for motions to withdraw the reference.	0.40	\$300.00
02/13/24	AMUE	Outline for Foley insurance team advice regarding opposition to pending motions to dismiss.	0.80	\$740.00
02/13/24	DMH	Analyze transcripts of prior hearing on insurers' motion to dismiss to identify directives from Court on how RCBO should amend its complaint.	1.60	\$760.00
02/13/24	DMH	Attend strategy call with K. Dedrickson and M. Roberts to strategize approach for drafting responses to motions to dismiss filed by insurers and CIGA.	0.40	\$190.00
02/13/24	ERR	Attend presentation of insurance analysis with client.	1.00	\$975.00
02/13/24	KRD	Analyze CIGA's motion to dismiss.	0.90	\$616.50
02/13/24	KRD	Call with D. Habib regarding strategy for responding to the motions to dismiss the adversary proceeding (.3); correspondence with E. Ridley and A. Uetz regarding same (.2).	0.50	\$342.50
02/13/24	MDL	Telephone conference with M. Kemner, R. Medeiros, P. Bongiovanni, and E. Ridley regarding insurance coverage overview and arguments to be addressed in adversary proceeding.	1.00	\$800.00
02/13/24	MRL	Review edits to the Responses to the Motion to Withdraw the Reference (.1); email correspondence with E. Ridley regarding the same (.1).	0.20	\$114.00
02/14/24	AMUE	Review motions to withdraw the reference (.5); revisions to proposed statement of non-opposition (.7).	1.20	\$1,110.00
02/14/24	DMH	Update matrix of insurance coverage based on recent responses to tenders received from Chubb.	1.50	\$712.50
02/14/24	JRBL	Review multiple letters denying claims related to Belvedere insurance company.	0.30	\$382.50
02/14/24	KRD	Prepare opposition to CIGA's motion to dismiss.	4.70	\$3,219.50

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02/15/24	DMH	Revise matrix of insurance coverage and Exhibit A to complaint to include recent tender responses from Chubb.	4.70	\$2,232.50
02/15/24	DMH	Analyze motion to dismiss filed by Primary Insurers to outline arguments in opposition.	0.60	\$285.00
02/16/24	DMH	Draft introduction section of RCBO's response to insurers' motion to dismiss third amended complaint.	0.50	\$237.50
02/16/24	DMH	Strategize with case team regarding approach for responding to CIGA's motion to dismiss, focusing on response to arguments regarding 29 proofs of claim submitted.	0.20	\$95.00
02/16/24	KRD	Correspondence with E. Ridley regarding strategy for opposing CIGA's motion to dismiss (.1); correspondence with D. Habib regarding strategy for opposing CIGA's motion to dismiss (.1).	0.20	\$137.00
02/17/24	KRD	Legal research in connection with opposing CIGA's motion to dismiss.	1.70	\$1,164.50
02/18/24	DMH	Draft Introduction section common to all three of RCBO's oppositions to Motions to Dismiss, filed by various insurers and CIGA.	1.20	\$570.00
02/19/24	DMH	Analyze transcripts of prior hearings on insurers' motion to dismiss RCBO's complaints, to identify Court's guidance to RCBO in amending complaint, to aid in drafting factual background section of opposition to motion.	0.40	\$190.00
02/19/24	KRD	Correspondence with D. Habib and E. Ridley regarding opposition to CIGA's motion to dismiss the adversary proceeding.	0.10	\$68.50
02/20/24	DMH	Draft factual background section of RCBO's oppositions to motions to dismiss filed by CIGA, primary insurers, and excess insurers.	2.10	\$997.50
02/20/24	DMH	Draft argument portion of RCBO's opposition to Primary Insurers motions to dismiss, focusing on adding factual support regarding directions court gave.	1.30	\$617.50
02/20/24	ERR	Review strategy regarding response to motion to dismiss regarding CIGA.	0.50	\$487.50

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02/20/24	ERR	Review draft response to motion to withdraw reference.	0.40	\$390.00
02/20/24	KAFA	Analysis of Notice of Determination provided in the matter of Bedivere Insurance Co.	0.20	\$79.00
02/20/24	KRD	Continued preparation of opposition to CIGA's motion to dismiss (3.2); legal research in connection with opposing CIGA's and excess insurers' motions to dismiss (.6).	3.80	\$2,603.00
02/20/24	KRD	Correspondence with A. Uetz and E. Ridley regarding strategy for opposing CIGA's motion to dismiss (.1); correspondence with M. Rofaeil regarding legal research for opposition to excess insurers' motion to dismiss (.1).	0.20	\$137.00
02/20/24	MDL	Revise Debtor's response to motion to withdraw the reference filed by Lloyd's.	1.20	\$960.00
02/20/24	MRL	Email correspondence regarding responses to the motions to dismiss with Foley team (.2); research regarding primary insurance exhaustion for large tort cases (2.2); email correspondence regarding the responses to the motions to withdraw (.2); edit the responses to the motions to withdraw the reference (1.3).	3.90	\$2,223.00
02/20/24	SJM	Respond to emails regarding timing and deadlines for filing responses to motions to withdraw the reference (.2); review district court dockets to confirm deadlines for filing (.3); telephone call with M. Lee regarding finalizing responses (.3); revise response to Lloyd's motion to withdraw (.7); email to A. Uetz regarding timing for filing (.2); email to B. Weisenberg regarding draft responses (.2).	1.90	\$1,425.00
02/21/24	AMUE	Review insurance coverage analysis.	0.50	\$462.50
02/21/24	DMH	Draft RCBO's opposition to motion to dismiss filed by primary insurers, focusing on adding factual support for actions RCBO has taken to satisfy Court's instructions.	6.80	\$3,230.00
02/21/24	ERR	Review responses to insurer request for documents.	0.40	\$390.00

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02/21/24	JCH	Calendar response deadlines and hearing date in District Court case related to Lloyd's motion to withdraw reference (.5); file Responses to Motions to Withdraw Reference on Lloyd's Appeal and Pacific Appeal (.5).	1.00	\$300.00
02/21/24	KRD	Continue drafting of opposition to CIGA's motion to dismiss (2.6); correspondence with D. Habib regarding background section for CIGA's motion to dismiss (.1); correspondence with E. Ridley and A. Uetz regarding opposition to CIGA's motion to dismiss (.1); correspondence with D. Habib regarding background section and strategy for opposition to excess insurers' motion to dismiss (.1); correspondence with M. Rofaail regarding research for opposition to excess insurers' motion to dismiss (.1); draft opposition to excess insurers' motion to dismiss (.5).	3.50	\$2,397.50
02/21/24	MDL	Email exchange with G. Albert (Keller) and B. Weisenberg (Lowenstein) regarding Committee response to Lloyd's motion to withdraw the reference.	0.10	\$80.00
02/21/24	MDL	Analyze Committee response to Lloyd's motion to withdraw the reference.	0.10	\$80.00
02/21/24	MDL	Revise Debtor's response to Pacific's motion to withdraw the reference.	0.20	\$160.00
02/21/24	MRL	Finalize research regarding primary insurance exhaustion for large tort cases (1.0); email correspondence with Foley team regarding the same (.2).	1.20	\$684.00
02/21/24	SJM	Revise response to Pacific motion to withdraw the reference (.5); further revisions to responses to motions based on comments from M. Lee (.6).	1.10	\$825.00
02/22/24	DMH	Revise analysis of insurance coverage for claims based on recent coverage letters from Chubb.	2.20	\$1,045.00
02/22/24	ERR	Review status of adversary proceeding regarding withdrawal of reference.	0.50	\$487.50
02/23/24	DMH	Revise insurance analysis of claims based on recent responses to tenders by Chubb.	2.90	\$1,377.50

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02/23/24	SJM	Email correspondence with A. Uetz and E. Ridley regarding appearances in District Court matters and potential consolidation of same.	0.20	\$150.00
02/26/24	AMUE	Provide advice to Foley team regarding response to motions to dismiss.	0.60	\$555.00
02/26/24	DMH	Update insurance coverage matrix based on recent tender responses to claims by Chubb.	1.50	\$712.50
02/26/24	ERR	Begin review of opposition regarding motion to dismiss.	0.70	\$682.50
02/26/24	ERR	Review case analysis regarding coverage for individual claims.	0.50	\$487.50
02/26/24	KRD	Correspondence with E. Ridley, A. Uetz, and S. Moses regarding strategy for opposing motions to dismiss in the adversary proceeding.	0.10	\$68.50
02/26/24	KRD	Draft opposition to excess insurers' motion to dismiss.	8.20	\$5,617.00
02/26/24	MR	Review correspondence from Lloyd's regarding tenders of claims and related documents regarding the substance of Lloyd's communication.	0.40	\$276.00
02/26/24	MRL	Email correspondence regarding 2004 motion (.1); review the case docket regarding the motion (.2); email correspondence regarding status of the case (.2).	0.50	\$285.00
02/26/24	SJM	Prepare email memo to E. Ridley and A. Uetz regarding timing for briefing of motions to dismiss in light of pending motions for withdrawal of reference.	0.60	\$450.00
02/27/24	DMH	Update insurance policy analysis document based on recent tender responses by Chubb to RCBO's tenders.	3.90	\$1,852.50
02/27/24	SJM	Telephone call with M. Lee regarding timing for responses to motions to dismiss.	0.10	\$75.00
02/28/24	DMH	Analyze recent tender responses by Chubb to update analysis of insurance coverage accordingly, based on Chubb's responses.	3.30	\$1,567.50
02/29/24	DMH	Analyze recent tender responses by Chubb to revise and update analysis of insurance coverage for claims.	3.60	\$1,710.00

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02/29/24	ERR	Telephone call with M. Kemner regarding insurance contact.	0.40	\$390.00
02/29/24	JCH	Prepare Notices of Appearance for Foley in both District Court cases.	0.50	\$150.00
02/29/24	MR	Coordinate filing of appearances for Foley counsel in District Court actions brought by insurers.	0.20	\$138.00
02/29/24	SJM	Email correspondence with M. Roberts regarding District Court notices of appearance (.2); revise draft notices (.3); email to E. Ridley and A. Uetz regarding same (.1); finalize notices of appearance (.2).	0.80	\$600.00
Task Total:			124.60	\$78,836.50

032 Rule 2004 Motions/Discovery/Subpoenas

02/01/24	KAFA	Prepare documents received from client for review and production to the Committee.	0.50	\$197.50
02/01/24	MCM	Email correspondence confirming redactions on untimely proofs of claim in advance of expected production of same to insurers.	0.40	\$330.00
02/01/24	MDL	Analyze correspondence from S. Levitt (A&M), K. Farrar (Foley), and P. Bongiovanni regarding collection and review of documents requested by Committee.	0.10	\$80.00
02/01/24	MDL	Email correspondence to R. Stewart regarding documents to be produced to insurers and protocols to ensure compliance with confidentiality agreements and orders.	0.30	\$240.00
02/01/24	MDL	Email correspondence to attorneys for insurers regarding documents to be produced under Rule 2004 and confidentiality orders.	0.40	\$320.00
02/01/24	MDL	Telephone conference with R. Stewart regarding confidentiality protocol for productions to insurers.	0.60	\$480.00
02/01/24	RTST	Prepare documents for production to the insurers.	0.80	\$592.00
02/02/24	JSH	Review documents for production.	0.30	\$210.00

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02/02/24	KAFA	Prepare documents received from client for review and production to the Committee.	1.20	\$474.00
02/02/24	KAFA	Preparation of documents for production to insurers.	1.20	\$474.00
02/02/24	MCM	Work on issues in connection with execution by insurer parties of confidentiality agreements required for production of abuse-claim information.	0.70	\$577.50
02/02/24	MDL	Provide instruction to J. Harper and K. Farrar (both of Foley) regarding review and production of additional Oakland Parochial Fund-related documents.	0.10	\$80.00
02/02/24	RTST	Prepare documents for production to the insurers.	0.90	\$666.00
02/04/24	EPK	Review email from P. Bongiovanni regarding responses to the Committee's diligence inquiries relating to CTN.	0.10	\$80.00
02/05/24	EPK	Correspond with S. Loop of A&M and M. Lee regarding the Committee's diligence inquiries relating to CTN arrangements (.3); email correspondence with counsel to CTN regarding protective order (.1).	0.40	\$320.00
02/05/24	KAFA	Prepare documents received from client for review and production to the Committee.	0.60	\$237.00
02/06/24	KAFA	Preparation of documents for production to insurers.	1.60	\$632.00
02/06/24	MDL	Provide instruction to R. Stewart and K. Farrar (Foley) regarding sequence of document production to insurers and identities of parties eligible to receive productions.	0.10	\$80.00
02/06/24	MDL	Email correspondence with counsel for all insurance company defendants regarding production of documents to parties who have returned signed acknowledgments and agreements to be bound by protective order.	0.10	\$80.00
02/06/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	2.40	\$1,776.00
02/07/24	KAFA	Preparation of documents for production to insurers.	1.90	\$750.50

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02/07/24	KAFA	Diligence call with P. Bongiovanni, D. Flanagan and A&M (.3); prepare documents received from client for review and production to the Committee (.8).	1.10	\$434.50
02/07/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	2.20	\$1,628.00
02/08/24	EPK	Coordinate with the A&M team regarding the nature and scope of the Committee's diligence requests relating to CTN (.4); review prior correspondence with the A&M team regarding same (.2).	0.60	\$480.00
02/08/24	KAFA	Preparation of documents for production to insurers.	1.20	\$474.00
02/08/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	1.50	\$1,110.00
02/09/24	EPK	Evaluate nature and extent of open diligence inquiries from the Committee regarding the CTN interest (.5); draft email to CTN's counsel, W. Smith of Binder & Malter, regarding CTN financial reporting and confidentiality issues relating to the Committee's diligence inquiries (.8).	1.30	\$1,040.00
02/12/24	EPK	Revise proposed email to CTN's counsel regarding RCBO's disclosure obligations to the estate, creditors, and the Committee (.3); coordinate with A. Uetz regarding proposed response to CTN's counsel (.1); send email correspondence to CTN's counsel regarding confidentiality issues relating to production of information relating to CTN (.2).	0.60	\$480.00
02/12/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	0.60	\$444.00
02/13/24	KAFA	Prepare documents received from client for review and production to the Committee.	0.50	\$197.50
02/13/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	1.10	\$814.00
02/14/24	KAFA	Diligence call with P. Bongiovanni, D. Flanagan and A&M.	0.60	\$237.00

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02/14/24	MDL	Telephone conference with P. Bongiovanni, A&M (C. Wiltgen, S. Loop), and K. Farrar (Foley) regarding additional BRG diligence requests and progress towards satisfying same.	0.60	\$480.00
02/14/24	MDL	Review BRG document and information requests on financial statements, bank account information, cemetery studies, and RCC contracts.	0.10	\$80.00
02/14/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	0.80	\$592.00
02/15/24	RTST	Prepare documents for production to the insurers.	1.00	\$740.00
02/16/24	EPK	Email correspondence with counsel to CTN-related counterparty, D. Cassidy of Alston & Bird, regarding confidential information to be disclosed to the Committee.	0.20	\$160.00
02/16/24	JSH	Analyze case law privilege issue for M. Lee.	2.30	\$1,610.00
02/16/24	KAFA	Prepare documents for production to the Committee.	0.40	\$158.00
02/18/24	EPK	Email correspondence with P. Bongiovanni regarding Committee diligence requests relating to Adventus real estate.	0.10	\$80.00
02/19/24	EPK	Email correspondence with P. Bongiovanni and C. Moore of A&M regarding information to be provided to the Committee relating to CCCEB transactions and Livermore property sale issues (.2); review Committee's request for documents relating to the contemplated Livermore property sale (.1); evaluate bankruptcy jurisdiction issues relating to real property owned by Non-Debtor Catholic Entity (.4).	0.70	\$560.00
02/21/24	KAFA	Prepare client documents for production to the Committee (.3); diligence call with P. Bongiovanni, A&M and D. Flanagan (.3).	0.60	\$237.00
02/21/24	MDL	Analyze Lloyd's letter to E. Ridley regarding production of claims tenders and whether the Debtor has satisfied those requests.	0.20	\$160.00
02/21/24	MDL	Analyze Lloyd's contentions with respect to Committee's Rule 2004 subpoena and order.	0.20	\$160.00

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02/21/24	MDL	Telephone conference with P. Bongiovanni, D. Flanagan (VeraCruz), K. Farrar (Foley) and A&M (S. Loop, C. Wiltgen) regarding updates to document diligence responses.	0.30	\$240.00
02/21/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	0.80	\$592.00
02/22/24	KAFA	Prepare client documents for production to the Committee.	0.50	\$197.50
02/22/24	MDL	Email exchange with B. Curet regarding production of discovery documents and proofs of claim.	0.30	\$240.00
02/22/24	MDL	Email exchange with P. Bongiovanni regarding review of privileged documents in employee files.	0.10	\$80.00
02/23/24	KAFA	Prepare client documents for production to the Committee (2.7); meeting with P. Bongiovanni, B. Flannery, and P. Schmidt to review client files (1.7).	4.40	\$1,738.00
02/23/24	MDL	Telephone conference with P. Bongiovanni, Sr. B. Flannery, and Fr. P. Schmidt regarding privileged documents in employee files.	1.80	\$1,440.00
02/23/24	MDL	Provide instruction to K. Farrar regarding review of potentially privileged documents following telephone conference with P. Bongiovanni, Sr. B. Flannery, and Fr. P. Schmidt about those documents.	0.20	\$160.00
02/23/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	1.40	\$1,036.00
02/24/24	MDL	Provide instruction to Foley team (M. Schachte, K. Farrar, R. Stewart) regarding production of employee files to insurer defendants.	0.20	\$160.00
02/24/24	MDL	Analyze additional documents marked "further review" from employee files for privilege and confidentiality designation.	0.40	\$320.00
02/25/24	KAFA	Prepare client documents for production to the Committee.	1.00	\$395.00

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02/26/24	EPK	Confer with M. Lee regarding Committee diligence inquiries relating to CTN and protocol for producing documents (.3); review email from D. Cassidy of Alston & Bird regarding Committee production protocol for CTN information (.1); further Foley team coordination regarding CTN production protocol (.2); draft response to D. Cassidy regarding same (.3).	0.90	\$720.00
02/26/24	KAFA	Preparation of documents to produce to the insurers.	1.80	\$711.00
02/26/24	KAFA	Prepare client documents for production to the Committee.	2.40	\$948.00
02/26/24	MDL	Email exchange with K. Farrar, M. Schachte, and R. Stewart regarding scope and timing of production of documents to insurers.	0.40	\$320.00
02/26/24	MDL	Telephone conference with E. Khatchaturian regarding CTN and T-Mobile confidentiality concerns and production protocol.	0.40	\$320.00
02/26/24	MR	Review District Court dockets for updates on appeal of Rule 2004 motion by insurers in adversary proceeding.	0.30	\$207.00
02/26/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	1.40	\$1,036.00
02/27/24	EPK	Confer with A. Uetz and M. Lee regarding consultation with the Committee relating to CTN information production protocol.	0.20	\$160.00
02/27/24	KAFA	Prepare responses to diligence items requested in C. Wiltgen email.	0.30	\$118.50
02/27/24	MDL	Analyze, per request of Committee counsel, sample of Clergy III files to determine if additional documents requested by Committee exist.	0.50	\$400.00
02/27/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	0.60	\$444.00
02/28/24	ERR	Briefly review insurer appeal of 2004 order.	0.50	\$487.50
02/28/24	KAFA	Diligence call with P. Bongiovanni, VeraCruz and A&M (.4); preparation of documents requested by the Committee and new client documents (1.0).	1.40	\$553.00

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02/28/24	KAFA	Preparation of documents to produce to the insurers.	0.40	\$158.00
02/28/24	RTST	Prepare documents for production to the insurers pursuant to the order on the Rule 2004 motion.	0.90	\$666.00
02/28/24	SJM	Brief initial review of Lloyd's notice of appeal and motion for leave to appeal ruling on Committee 2004 motion (.7); brief initial review of motion for stay pending appeal and request to shorten time on same (.5); email to case team regarding same (.3).	1.50	\$1,125.00
02/28/24	TND	Review potential appealability of 2004 orders.	0.20	\$147.00
02/29/24	EPK	Confer with M. Lee regarding Committee's agreement with CTN document production protocol (.1); email correspondence with D. Cassidy of Alston & Bird regarding same (.3).	0.40	\$320.00
02/29/24	MDL	Email exchange with Lowenstein (M. Kaplan, C. Restel, B. Weisenberg) regarding CTN disclosures and production protocol.	0.30	\$240.00
		Task Total:	59.40	\$36,712.00

034 Other Motion Practice

02/01/24	MDL	Draft summary of proofs of claim confidentiality requirements and relevant orders and forms.	0.60	\$480.00
02/02/24	SJM	Telephone call with G. Albert regarding Committee request for Zoom-only hearing on 2/7 (.2); telephone call with chambers regarding same (.2); prepare notice of continued hearing by Zoom only (.6).	1.00	\$750.00
02/14/24	JSH	Finalize and coordinate filing of removal extension motion.	0.10	\$70.00
		Task Total:	1.70	\$1,300.00

035 General Counsel Matters

02/15/24	JRBL	Analyze regarding governance issues.	0.60	\$765.00
02/15/24	LFG	Review information with R. Medeiros regarding investigation of accused priest.	1.10	\$1,210.00
02/17/24	TFCA	Draft email to public defender regarding request for priest file.	0.20	\$265.00
02/24/24	TFCA	Emails with L. Glahn regarding priest file (.1); email public defender regarding same (.1).	0.20	\$265.00
		Task Total:	2.10	\$2,505.00

038 Mediation

02/01/24	ERR	Review case and mediation strategy.	0.60	\$585.00
02/01/24	JRBL	Follow-up work following initial session of mediation to respond to mediator questions.	2.20	\$2,805.00
02/01/24	LFG	Prepare submission to mediators.	0.50	\$550.00
02/01/24	MDL	Telephone conference with M. Kemner regarding claims and asset data needed for mediation.	0.30	\$240.00
02/02/24	JRBL	Analysis of tort claim data for mediation.	3.30	\$4,207.50
02/05/24	AMUE	Review information request from mediator (.2) and outline strategy for responding to same (.3); draft memorandum identifying action items necessary for next meeting with mediators (1.1).	1.60	\$1,480.00
02/05/24	JRBL	Review mediation claims values in preparation for client call.	0.30	\$382.50
02/05/24	MCM	Analyze issues raised by client parties in recent/pending diocesan bankruptcy cases (.4) and respond to email requests regarding same (.3).	0.70	\$577.50
02/05/24	TFCA	Review email from M. Kemner regarding claims analysis for mediation and discuss with J. Blease.	0.30	\$397.50
02/06/24	AMUE	Email communication with J. Sontchi (.2); telephone communication with B. Weisenberg regarding mediation (.3); outline topics to cover during next mediation session with mediators (.8).	1.30	\$1,202.50

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02/06/24	AMUE	Meeting with P. Bongiovanni and J. Blease to discuss mediation strategy.	0.50	\$462.50
02/06/24	AMUE	Meeting with M. Moore, J. Blease, T. Carlucci, T. Raab and N. DeLuca regarding preparation for mediation.	1.00	\$925.00
02/06/24	AMUE	Multiple email communications with M. Kemner regarding preparation for mediation.	0.50	\$462.50
02/06/24	JRBL	Telephone conversation with expert regarding claims debriefing following client meeting.	1.00	\$1,275.00
02/06/24	JRBL	Follow-up call with T Carlucci regarding expert valuation of claims for mediation.	0.30	\$382.50
02/06/24	JRBL	Consultation with expert regarding mediation.	0.80	\$1,020.00
02/06/24	JRBL	Telephone conference with T. Carlucci regarding mediation strategy.	0.50	\$637.50
02/06/24	MCM	Claims-valuation debrief meeting with Foley and A&M claims-review teams following January 26 Steering Committee meeting.	1.00	\$825.00
02/06/24	MCM	Work on package of requested materials for client parties in preparation for mediation.	0.70	\$577.50
02/06/24	TFCA	Telephone call with J. Blease regarding strategy regarding mediation (.5); meet with Foley and A&M regarding claims evaluation strategy (1.0); telephone call with J. Blease and C. Moore regarding financial analysis strategy regarding mediation (.8); telephone call with J. Blease regarding follow up on these matters (.3).	2.60	\$3,445.00
02/07/24	JRBL	Telephone conference with T. Carlucci regarding mediation strategy.	0.80	\$1,020.00
02/07/24	MCM	Finalize documents requested by client parties in connection with mediation preparation.	2.00	\$1,650.00
02/07/24	TFCA	Telephone call with J. Blease regarding mediation strategy (.6); telephone call with J. Blease regarding mediation strategy in connection with financial issues (.8).	1.40	\$1,855.00
02/08/24	AMUE	Email communications with M. Kemner regarding mediation strategy.	0.40	\$370.00
02/08/24	AMUE	Outline strategy regarding mediation for discussion with client.	1.70	\$1,572.50

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02/08/24	JRBL	Telephone conference with T. Carlucci to discuss mediation valuation issues.	0.50	\$637.50
02/08/24	JRBL	Telephone conference with M. Kemner regarding claims evaluation.	0.80	\$1,020.00
02/08/24	JRBL	Evaluation of claims in preparation for client call to establish mediation values.	2.40	\$3,060.00
02/08/24	MCM	Follow-up work on analysis requested by client parties in connection with mediation preparation.	0.60	\$495.00
02/09/24	JRBL	Tort claim analysis in preparation for mediation.	3.30	\$4,207.50
02/12/24	JRBL	Telephone conference with M. Kemner and R. Medeiros regarding mediation evaluations.	0.80	\$1,020.00
02/12/24	JRBL	Evaluation of tort claim data and case summaries in preparation for client call.	4.40	\$5,610.00
02/12/24	KAFA	Communications with M. Moore regarding analysis of claims in mediator-requested factual matrix.	0.40	\$158.00
02/12/24	KAFA	Analysis of factual matrix required by mediator T. Subramaniam (.5); strategize regarding preparation of factual matrix (.5); attend A&M presentation of claims analysis to M. Kemner and R. Medeiros in preparation for mediation (.8); prepare claims analysis for J. Blease (1.2).	3.00	\$1,185.00
02/12/24	LFG	Work on mediation strategy.	0.40	\$440.00
02/12/24	MCM	Conference call with K. Farrar regarding response to mediator request for information and collection/collation of same from various sources already in Foley possession (.4); strategize regarding same to satisfy requests in efficient, cost-effective manner (.5).	0.90	\$742.50
02/12/24	MDL	Prepare for (.2) and attend telephone conference with M. Kemner, P. Bongiovanni, R. Medeiros, A&M (N. DeLuca and T. Haab), and Foley personnel (M. Moore, T. Carlucci, J. Blease) regarding claims analysis and strategy for mediation regarding same (.8).	1.00	\$800.00

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02/13/24	AMUE	Telephone conference with Judge Sontchi (.3); email communication with Judge Sontchi and J. Krivis regarding mediation session with Debtor professionals (.2); email communication with Judge Sontchi, J. Krivis and counsel for the Committee regarding mediation session with the Committee and Debtor (.2).	0.70	\$647.50
02/13/24	AMUE	Review request for information received from J. Krivis (.3) and outline part of response to same (.3).	0.60	\$555.00
02/13/24	JRBL	Study claims chart prepared by Foley to respond to questions in mediation.	1.20	\$1,530.00
02/13/24	JRBL	Strategy discussion with T. Carlucci in preparation for mediation.	0.80	\$1,020.00
02/13/24	JRBL	Review carrier motion and analyze for effect on mediation process.	0.60	\$765.00
02/13/24	KAFA	Analysis of claims review spreadsheet and insurance coverage matrix.	1.00	\$395.00
02/13/24	KAFA	Review Quarterly Chapter 11 Case Update strategy memorandum for context to respond to mediator request.	1.00	\$395.00
02/13/24	KAFA	Meeting with J. Blease to discuss mediation strategy.	0.80	\$316.00
02/13/24	LFG	Strategize regarding mediation strategy and claims.	0.30	\$330.00
02/13/24	MCM	Research issues in connection with mediator requests for information on claims and insurance coverage.	1.10	\$907.50
02/13/24	TFCA	Telephone call with J. Blease regarding mediation strategy.	0.80	\$1,060.00
02/14/24	AMUE	Telephone conference with J. Prol and B. Weisenberg regarding mediation issue (.3); outline mediation strategy for initial meeting with professionals (1.1); review update to case outcomes in other diocese cases for consideration in our case (.5).	1.90	\$1,757.50
02/14/24	JRBL	Telephone conference with T. Carlucci regarding mediation preparation.	0.30	\$382.50

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02/14/24	JRBL	Further analysis of expert research regarding claims valuation.	1.40	\$1,785.00
02/14/24	KAFA	Analysis of insurance coverage chart in preparation for factual matrix requested by mediator.	0.30	\$118.50
02/14/24	TFCA	Telephone call with J. Blease regarding mediation strategy (.3); review issues related to same (.2).	0.50	\$662.50
02/15/24	AMUE	Email with Judge Sontchi and J. Krivis regarding mediation (.3); telephone conference with Judge Sontchi (.2); email communication with Committee counsel and mediators regarding mediation (.3).	0.80	\$740.00
02/15/24	AMUE	Outline matters to consider for mediation.	2.20	\$2,035.00
02/15/24	AMUE	Meeting with P. Bongiovanni regarding mediation strategy.	0.50	\$462.50
02/15/24	JRBL	Review hearing transcripts in preparation for mediation.	0.40	\$510.00
02/15/24	JRBL	Further analysis of claims in preparation for mediation.	2.30	\$2,932.50
02/15/24	JRBL	Conference with mediators and Committee counsel.	0.80	\$1,020.00
02/15/24	JRBL	Telephone conference with A. Uetz and C. Moore regarding financial matters related to mediation.	0.50	\$637.50
02/15/24	MCM	Work on issues in connection with mediator's request for information on claims and formatting for same.	1.20	\$990.00
02/15/24	MDL	Telephone conference with A. Uetz regarding timing of upcoming mediation sessions and strategy for same.	0.20	\$160.00
02/15/24	TFCA	Prepare for Committee call (.2); meeting with the Committee and Committee counsel regarding mediation (.3).	0.50	\$662.50
02/16/24	AMUE	Draft memorandum to client leadership regarding action items needed for mediation.	1.70	\$1,572.50

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02/16/24	JCH	Pull copies of Plan and Disclosure Statement from Boy Scouts of America bankruptcy for mediation prep (.5); review Pacer for bankruptcy of USA Gymnastics for mediation prep (.4) and email to M. Moore regarding same (.1).	1.00	\$300.00
02/16/24	JRBL	Review claims data in preparation for mediation.	3.30	\$4,207.50
02/16/24	KAFA	Strategize regarding compilation of data requested by Krivis.	1.10	\$434.50
02/16/24	MCM	Email correspondence with A. Uetz and M. Lee regarding non-diocesan case outcomes with significant abuse claims and strategy for review of same (.5); analyze parish issues in other diocesan cases (.4); email correspondence regarding same (.3); review information related to non-diocesan cases and incorporate into analysis (.5); email correspondence regarding weekly updates on pending cases (.3).	2.00	\$1,650.00
02/17/24	AMUE	Draft memorandum to M. Kemner regarding multiple action items needed for mediation.	1.10	\$1,017.50
02/17/24	JRBL	Telephone conference with P. Bongiovanni regarding mediation.	0.80	\$1,020.00
02/18/24	AMUE	Finalize memorandum to M. Kemner regarding action items needed for mediation (.7); communication with P. Bongiovanni to prepare for mediation (.3).	1.00	\$925.00
02/18/24	JRBL	Analyze regarding mediation preparation.	0.60	\$765.00
02/18/24	MCM	Review email memorandum from M. Mitcham regarding analysis of parish issues in other diocesan cases.	0.40	\$330.00
02/18/24	MRM	Analyze parish involvement in various chapter 11 proceedings.	3.90	\$2,223.00
02/19/24	AMUE	Prepare for mediation including drafting communication to client regarding mediation preparation.	2.60	\$2,405.00
02/19/24	ERR	Review areas of mediation preparation for insurance issues.	0.50	\$487.50
02/19/24	JRBL	Analysis of claims data in preparation for mediation.	2.00	\$2,550.00

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02/19/24	LFG	Prepare mediation strategy.	0.70	\$770.00
02/19/24	MCM	Email correspondence with insurance team regarding analysis of claims and related issues (.3); review documents provided by same and begin incorporation into claims-review documents (1.0); follow-up email correspondence regarding same (.2).	1.50	\$1,237.50
02/19/24	MDL	Email exchange with Foley personnel (A. Uetz, J. Blease, T. Carlucci, L. Glahn) regarding strategy for next mediation session.	0.10	\$80.00
02/19/24	MDL	Analyze preparation of plan term sheet for mediation session.	0.20	\$160.00
02/19/24	MRM	Analyze additional dockets for parish involvement.	2.40	\$1,368.00
02/20/24	AMUE	Revisions to mediation strategy document (.9); review communication from C. Moore to incorporate his comments (.2); review communication from J. Blease to incorporate his comments (.2) and respond to same (.4).	1.70	\$1,572.50
02/20/24	AMUE	Meeting with M. Moore and K. Farrar to discuss claims information requested by J. Krivis for mediation (.8); review claims information suggested for delivery (.9).	1.70	\$1,572.50
02/20/24	AMUE	Email communications (x3) with J. Krivis regarding mediation.	0.30	\$277.50
02/20/24	AMUE	Meeting with M. Kemner and M. Lee regarding church issue as it relates to mediation.	0.50	\$462.50
02/20/24	AMUE	Weekly strategy meeting with P. Bongiovanni and C. Moore with focus on mediation.	0.80	\$740.00
02/20/24	DMH	Correspond with bankruptcy team regarding policy analysis document and assisting in preparing documents for upcoming mediation.	0.20	\$95.00
02/20/24	JCH	Email to A. Uetz sending mediation order and contact information for insurance mediators.	0.50	\$150.00
02/20/24	JRBL	Telephone conference with M. Kemner, A. Uetz and T. Carlucci regarding mediation preparation (0.9); prepare information for same (.4).	1.30	\$1,657.50

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02/20/24	JRBL	Continued review of claims data in preparation for mediation.	3.30	\$4,207.50
02/20/24	JRBL	Review issues for call (.3); telephone conference with T. Carlucci regarding mediation preparation (.2).	0.50	\$637.50
02/20/24	KAFA	Analysis of RCBO claims analysis insurance chart to synthesize data needed for preparation of factual matrix requested by Krivis (.3); strategize regarding compilation of data requested by Krivis (.9).	1.20	\$474.00
02/20/24	LFG	Analyze communications regarding Steering Committee meeting and mediation strategy.	0.40	\$440.00
02/20/24	MCM	Work on claims analysis at request of mediator (1.0); conference call with A. Uetz regarding same (.3); conference call with N. DeLuca at A&M regarding same (.4); incorporate data from other sources into claims analysis in preparation for discussion with mediators (.6).	2.30	\$1,897.50
02/20/24	MRM	Research other diocese case dockets in connection with various committee positions.	0.20	\$114.00
02/20/24	TFCA	Attend claims valuation call (partial) (.5); review email from A. Uetz regarding claims analysis issues and strategy and respond to same (.3); telephone call with J. Blease regarding same (.2); review schedules and related logistics issues for mediation (.2).	1.20	\$1,590.00
02/21/24	AMUE	Prepare strategy deck for client meeting (.9); communications with P. Bongiovanni regarding same (.3); communications with C. Moore regarding same (.4).	1.60	\$1,480.00
02/21/24	AMUE	Meeting with P. Bongiovanni, A. Armanino and J. Tarman regarding mediation.	2.40	\$2,220.00
02/21/24	AMUE	Telephone conference with J. Prol and B. Weisenberg regarding mediation.	0.30	\$277.50
02/21/24	AMUE	Meeting with M. Kemner regarding mediation strategy.	0.40	\$370.00
02/21/24	JRBL	Analysis of claims in preparation for mediation.	3.30	\$4,207.50

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02/21/24	MCM	Work on analysis of non-diocesan abuse-based bankruptcy outcomes in response to client requests and in preparation for mediation.	1.20	\$990.00
02/21/24	MDL	Evaluate restricted funds analysis for purposes of mediation preparation.	1.00	\$800.00
02/21/24	TFCA	Review emails regarding mediation (.4); telephone call with J. Blease regarding mediation strategy prep (.4); review emails from A. Uetz regarding mediation update issues (.4).	1.20	\$1,590.00
02/22/24	AMUE	Draft correspondence to client leadership regarding mediation.	0.40	\$370.00
02/22/24	AMUE	Conference with B. Weisenberg regarding mediation (.2); conference with Judge Sontchi regarding mediation (.2).	0.40	\$370.00
02/22/24	AMUE	Conference with M. Kemner regarding mediation strategy.	0.50	\$462.50
02/22/24	JRBL	Analysis of memo regarding CTN asset in preparation for mediation.	0.30	\$382.50
02/22/24	JRBL	Review presentation on real estate holdings and analysis in preparation for mediation.	1.40	\$1,785.00
02/22/24	JRBL	Analysis of memorandum regarding restricted gifts under California law in preparation for mediation.	0.30	\$382.50
02/22/24	JRBL	Analysis of memo regarding CTN membership and legal issues related to nonprofits in preparation for mediation.	0.60	\$765.00
02/22/24	JRBL	Analysis of restricted and unrestricted cash in preparation for mediation.	1.20	\$1,530.00
02/22/24	MCM	Email correspondence regarding mediation preparation during week of February 26, 2024 (.3); email correspondence with Foley team regarding developments in Rockville Centre bankruptcy case (.3); analyze issues in connection with requests for information on same and respond (.5).	1.10	\$907.50
02/22/24	MDL	Telephone conference with A. Uetz, J. Blease, and T. Carlucci regarding strategy for first joint mediation session.	0.40	\$320.00

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02/22/24	MDL	Strategize logistics and work product preparations for upcoming mediation sessions.	0.20	\$160.00
02/22/24	MDL	Strategize regarding mediators and preparation for 2/27 session with Judge Sontchi.	0.20	\$160.00
02/22/24	MDL	Analyze summaries relating to information and work product needed in advance of upcoming mediation sessions.	0.20	\$160.00
02/22/24	TFCA	Review update emails from A. Uetz regarding mediation issues (.3); review A. Uetz analysis regarding mediator availability (.2).	0.50	\$662.50
02/23/24	AMUE	Meeting with Judge Sontchi and B. Weisenberg regarding mediation.	0.70	\$647.50
02/23/24	JRBL	Analysis of other diocesan reorganization plans and funding sources for plan in preparation for mediation.	2.40	\$3,060.00
02/23/24	JRBL	Telephone conference with T. Carlucci regarding mediation preparation.	0.50	\$637.50
02/23/24	KAFA	Prepare list of Diocese of Oakland's Safe Environment efforts in preparation for mediation (1.3); analysis of tiering worksheet from A&M in preparation of information requested by Krivis (.3).	1.60	\$632.00
02/23/24	MCM	Incorporate claim-review information from A&M into materials to be provided to mediator and circulate updated spreadsheet to Foley team prior to mediation prep on February 26 and 27.	1.00	\$825.00
02/23/24	TFCA	Telephone call with J. Blease regarding mediation prep.	0.50	\$662.50
02/25/24	AMUE	Draft presentation for initial meeting between Foley and mediators.	1.80	\$1,665.00
02/25/24	MCM	Email correspondence regarding mediation preparation and related information requests.	0.30	\$247.50
02/25/24	MDL	Strategize regarding presentation to Judge Sontchi at 2/27 mediation session.	1.00	\$800.00
02/26/24	AMUE	Prepare for meeting with Foley team and Judge Sontchi (.7); meeting with J. Blease, T. Carlucci, L. Glahn and M. Lee to prepare for mediation meeting (2.5); finalize deck for meeting (1.3).	4.50	\$4,162.50

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02/26/24	AMUE	Review email received from J. Krivis regarding mediation (.2) and respond to same (.1).	0.30	\$277.50
02/26/24	AMUE	Draft correspondence to Bishop Barber regarding mediation.	0.80	\$740.00
02/26/24	ERR	Prepare for mediation regarding bankruptcy with Judge Sonchti.	2.70	\$2,632.50
02/26/24	JRBL	Analysis of claims matrix in preparation for meeting with mediator.	3.20	\$4,080.00
02/26/24	JRBL	Conference with Foley team in preparation for mediation (2.5); prepare for same (.2).	2.70	\$3,442.50
02/26/24	LFG	Prepare mediation submission regarding history of diocese, safe environment initiatives and future undertakings (1.9); work on same (.4); meet with mediation team on strategy for first session (2.5).	4.80	\$5,280.00
02/26/24	MCM	Email correspondence with client parties regarding analysis of case outcome and related issues (.4); revise claims-review analysis for mediation purposes and circulate to A. Uetz for review (.3).	0.70	\$577.50
02/26/24	MDL	Participate remotely in meeting with Foley team to prepare for presentation to C. Sontchi (only participated in part of the meeting).	1.20	\$960.00
02/26/24	MRL	Analyze the frequency data of the sexual abuse claims.	1.10	\$627.00
02/26/24	MRL	Confer with M. Moore regarding the frequency date of the sexual abuse claims.	0.20	\$114.00
02/26/24	TFCA	Review mediation updates from A. Uetz (.2); prepare for meeting; review PowerPoint and Excel spreadsheet (.7); attend meeting with Foley team to prep for mediation (2.5).	3.40	\$4,505.00
02/27/24	AMUE	Prepare for meeting with mediator and Foley team (1.2); mediation meeting with Judge Sontchi and Foley team (4.0); debrief meeting with Foley team (partial) (.9).	6.10	\$5,642.50
02/27/24	ERR	Review insurance issues regarding mediation strategy including analysis of claims for both Chapter 11 and insurance mediations.	7.00	\$6,825.00
02/27/24	JRBL	Develop strategy for mediation.	0.80	\$1,020.00

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02/27/24	JRBL	Communications with A. Uetz regarding opening offer.	0.30	\$382.50
02/27/24	JRBL	Prepare for mediation session (1.0); attend mediation session with mediator, A. Uetz, T. Carlucci, L.Glahn and M. Lee (4.0).	5.00	\$6,375.00
02/27/24	LFG	Participate in mediation (4.0) and post-mediation strategy sessions (1.3) (partial).	5.30	\$5,830.00
02/27/24	MCM	Conference call with client parties regarding analysis of case outcomes (.5); revise charts based on client instructions and recirculate to client parties for review (.5); further email correspondence and revisions to same (.6).	1.60	\$1,320.00
02/27/24	MDL	Meet with C. Sontchi and Foley team for preliminary in-depth mediation discussion (partial).	3.20	\$2,560.00
02/27/24	MDL	Strategize with Foley team regarding overall mediation strategy, asset identification, and initial offer terms(1.5); further review of information regarding same (.5).	2.00	\$1,600.00
02/27/24	TFCA	Attend meeting with mediator (4.0); attend post-meeting debrief and strategy session (1.5); work on logistics for mediation with S. Durkee (.5); emails regarding follow up issue for mediation (.3).	6.30	\$8,347.50
02/28/24	AMUE	Meet with J. Blease, T. Carlucci and E. Ridley to discuss mediation strategy.	0.80	\$740.00
02/28/24	EPK	Review mediation update from A. Uetz.	0.10	\$80.00
02/28/24	ERR	Review settlement strategy analysis.	0.60	\$585.00
02/28/24	JRBL	Continue to develop negotiation strategy following initial mediator sessions.	1.30	\$1,657.50
02/28/24	JRBL	Telephone conference with A. Uetz, T. Carlucci and E. Ridley regarding mediation negotiation strategy.	0.80	\$1,020.00
02/28/24	JRBL	Analysis of Camden proposed plan terms to prepare for mediation.	1.80	\$2,295.00
02/28/24	LFG	Work with team on mediation strategy (.5); communications with clients on same (.3).	0.80	\$880.00

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02/28/24	MCM	Email correspondence regarding preparation for meeting with mediator scheduled for March 1, 2024 (.3); prepare for meeting (.4).	0.70	\$577.50
02/28/24	TFCA	Email correspondence with Foley team regarding mediation strategy (.6); telephone call with E. Ridley, A. Uetz, and J. Blease regarding same (.8); review draft email to client regarding meeting with mediator (.2); prepare for meeting on mediation strategy (.2).	1.80	\$2,385.00
02/29/24	AMUE	Review email received from R. Medeiros regarding mediation (.1) and respond to same (.2).	0.30	\$277.50
02/29/24	JRBL	Develop strategy for mediation by reviewing Camden Plan.	2.30	\$2,932.50
02/29/24	JRBL	Brief scan of the insurer motion to stay and proposed appeal for background in preparation for mediation.	0.50	\$637.50
02/29/24	JRBL	Telephone conference with M. Moore regarding spreadsheet updates in preparation for mediation.	0.20	\$255.00
02/29/24	JRBL	Analysis of other diocesan plan confirmations and terms in preparation for mediation.	0.80	\$1,020.00
02/29/24	KAFA	Prepare "Overview Spreadsheet Summarizing Other Bankruptcies" and "Claims Review Worksheet (prepared for mediation)" for J. Blease in preparation for mediation.	0.90	\$355.50
02/29/24	LFG	Prepare mediation summary (.2); communications with M. Kemner on same (.2).	0.40	\$440.00
02/29/24	MCM	Email correspondence with Foley team regarding meeting with mediator scheduled for March 1, 2024 and preparation for same (.5); revise claim charts and other information for use with mediator and circulate to client parties for review (1.4); prepare outline for meeting with mediator regarding claims and other issues (.5).	2.40	\$1,980.00
Task Total:			219.10	\$225,399.50
Services Total:			681.90	\$556,880.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Joseph S. Harper	JSH	Associate	11.00	\$700.00	\$7,700.00
Kirsten R. Dedrickson	KRD	Associate	26.20	\$685.00	\$17,947.00
Mason Roberts	MR	Associate	2.10	\$690.00	\$1,449.00
Mary Rofaeil	MRL	Associate	35.10	\$570.00	\$20,007.00
Mikaela R. Mitcham	MRM	Associate	9.00	\$570.00	\$5,130.00
Shane J. Moses	SJM	Of Counsel	37.30	\$750.00	\$27,975.00
Janelle C. Harrison	JCH	Paralegal	32.40	\$300.00	\$9,720.00
Kerry A. Farrar	KAFA	Paralegal	44.40	\$395.00	\$17,538.00
Ann Marie Uetz	AMUE	Partner	98.50	\$925.00	\$91,112.50
Emil P. Khatchaturian	EPK	Partner	46.50	\$800.00	\$37,200.00
Eileen R. Ridley	ERR	Partner	28.20	\$975.00	\$27,495.00
Jonathan P. Witt	JPWI	Partner	0.80	\$800.00	\$640.00
Jeffrey R. Blease	JRBL	Partner	83.30	\$1,275.00	\$106,207.50
Lisa F. Glahn	LFG	Partner	17.40	\$1,100.00	\$19,140.00
Mark C. Moore	MCM	Partner	31.20	\$825.00	\$25,740.00
Matthew D. Lee	MDL	Partner	38.70	\$800.00	\$30,960.00
Thomas F. Carlucci	TFCA	Partner	32.80	\$1,325.00	\$43,460.00
Alan R. Ouellette	AROU	Senior Counsel	0.50	\$800.00	\$400.00
Matthew S. Kiel	MSK	Senior Counsel	0.90	\$775.00	\$697.50
Robert T. Stewart	RTST	Senior Counsel	16.40	\$740.00	\$12,136.00
Daniyal M. Habib	DMH	Special Counsel	43.60	\$475.00	\$20,710.00
Tamar N. Dolcourt	TND	Special Counsel	45.60	\$735.00	\$33,516.00
Totals			681.90		\$556,880.50

Expenses Incurred

Description	Amount
Document Retrieval	\$88.00
Electronic Legal Research Services	\$1,784.50
LSS - eDiscovery Services	\$3,600.00
Expenses Incurred Total	\$5,472.50

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

Expense Detail

Document Retrieval

Date	Initials	Description	Amount
11/07/23	JRBL	NEW SEASON CORPORATE SERVICES - Obtain certified copy of Articles and Amendment from the California Secretary of State for The Roman Catholic Communications Corporation of the Bay Area - 11/07/23.	\$88.00

Electronic Legal Research Services

Date	Initials	Description	Amount
02/29/24	MRL	SEARCH ACCESS CHARGE. Image756-0. Search. Docket Report. Westlaw. US TREATISES DOC ACCESS.	\$1,784.50

LSS - eDiscovery Services

Date	Initials	Description	Amount
02/29/24	JRBL	LSS - eDiscovery Services.	\$3,600.00

Expense Total:	\$5,472.50
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Paul B. Bongiovanni
Chief Financial Officer
Roman Catholic Bishop of Oakland
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: April 30, 2024
Invoice No.: 50828972
Our Ref. No.: 100845-0402

Services through March 31, 2024

Amount due for professional services rendered regarding Chapter 11 Bankruptcy \$410,027.50

Total Expenses: \$5,415.65

Amount Due: \$415,443.15

Please reference your invoice number 50828972 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of this invoice.

Federal Employer Number:
39-0473800

Professional Services Detail

003 Automatic Stay

03/06/24	EPK	Email correspondence with A. Uetz regarding update on resolution of stay violations.	0.20	\$160.00
03/10/24	EPK	Review prior responses from plaintiffs' attorneys in response to stay violation letters sent last month (.2); assess whether any further follow up with counsel is necessary (.1).	0.30	\$240.00
Task Total:			0.50	\$400.00

004 Bankruptcy Litigation/Adversary Proceedings

03/05/24	EPK	Review email correspondence from B. Wilson of the Plageman firm and P. Bongiovanni regarding Bennett Trust issues (.2); email correspondence with M. Lee regarding strategy relating to probate administration of the Bennett Trust (.1).	0.30	\$240.00
03/06/24	EPK	Coordinate with P. Bongiovanni and the Plageman firm regarding next steps relating to probate administration of the Bennett Trust.	0.20	\$160.00
03/07/24	EPK	Review current draft of demand letter to Bennett Trust trustee regarding turnover of trust distributions (.1); revise same (.1); call with M. Lee to discuss settlement strategy relating to same (.2); call with R. Lund and B. Wilson of the Plageman firm and P. Bongiovanni regarding Bennett Trust strategy and probate issues to be addressed (.9); post-call email correspondence with B. Wilson regarding demand letter citations (.2).	1.50	\$1,200.00
03/08/24	EPK	Address probate issues relating to beneficial interests of St. Perpetua under the Bennett Trust (.3); call with J. Harper regarding research and demand letter assignment relating to same (.6).	0.90	\$720.00
03/08/24	JSH	Call with E. Khatchatourian regarding Bennett Trust probate/turnover issue letter (.5); research regarding the same (.2).	0.70	\$490.00

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03/09/24	EPK	Email correspondence with P. Bongiovanni regarding status of demand letter relating to Bennett Trust issues.	0.20	\$160.00
03/11/24	EPK	Strategy call with J. Harper regarding turnover demand letter to be sent to the trustee of the Bennett Trust (.4); review correspondence from counsel for the trustee of the Bennett Trust (.2); review probate petition that was filed in September 2023 (.1).	0.70	\$560.00
03/11/24	JSH	Analyze probate exception issues and probate docket filings (1.5); draft turnover letter regarding Bennett Trust (1.0).	2.50	\$1,750.00
03/12/24	EPK	Confer with J. Harper regarding Bennett Trust demand letter issues (.3); review revised draft of the turnover demand letter (.2); edit and comment on same (.2).	0.70	\$560.00
03/12/24	JSH	Revise turnover letter re Bennett Trust (1.7); strategize with E. Khatchaturian regarding the same (.2).	1.90	\$1,330.00
03/18/24	EPK	Revise turnover demand letter to counsel to the Bennett Trust trustee (.5); confer with J. Harper regarding additional case law support to be cited within same (.1).	0.60	\$480.00
03/19/24	EPK	Confer with J. Harper regarding turnover strategy relating to the Bennett Trust beneficial interest (.3); email correspondence with M. Lee regarding revised turnover letter (.1).	0.40	\$320.00
03/19/24	JSH	Revise turnover letter regarding Bennett Trust in communication with E. Khatchaturian.	0.60	\$420.00
03/23/24	MDL	Edit letter to trustee of Bennett Trust demanding turnover of trust proceeds reserved for church beneficiary.	0.20	\$160.00
03/24/24	EPK	Finalize demand letter to counsel for the trustee of the Bennett Trust (.2); review comments from M. Lee regarding same (.1); send draft turnover demand letter to RCBO's probate counsel, R. Lund and B. Wilson of the Plageman firm (.1).	0.40	\$320.00

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03/27/24	EPK	Email correspondence with RCBO's probate counsel, R. Lund of Plageman, Lund & Cannon, regarding comments to Bennett Trust turnover demand letter (.2); review R. Lund's comments (.1); confer with J. Harper regarding further revisions to be made to the turnover demand letter (.2).	0.50	\$400.00
03/27/24	JSH	Edit turnover letter regarding Bennett Trust in communication with E. Khatchatourian.	1.50	\$1,050.00
03/28/24	EPK	Email correspondence with J. Harper regarding comments to Bennett Trust demand letter (.3); provide limited comments to same (.2); email correspondence with R. Lund of the Plageman firm regarding revised turnover demand letter and next steps relating to same (.1).	0.60	\$480.00
03/28/24	JSH	Revise turnover letter regarding Bennett Trust in communication with E. Khatchatourian and probate counsel.	0.70	\$490.00
03/29/24	EPK	Email correspondence with RCBO's probate counsel, R. Lund of Plageman, Lund & Cannon, regarding Bennett Trust dispute strategy (.3); Foley team correspondence regarding finalization of turnover demand letter (.1).	0.40	\$320.00
03/31/24	EPK	Email correspondence with M. Lee and J. Harper regarding finalization of the Bennett Trust turnover demand letter and expected timing of transmission of same.	0.20	\$160.00
Task Total:			15.70	\$11,770.00

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

03/04/24	AMUE	Review information from Clergy III files regarding claims.	0.90	\$832.50
03/04/24	MCM	Review email correspondence regarding inquiry on claims issue (.2); confer with K. Farrar regarding response to same and incorporation of data into slide decks (.3).	0.50	\$412.50
03/07/24	KAFA	Research historical Clergy III settlement agreements (facts and documentation).	1.70	\$671.50

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April 30, 2024

03/07/24	MCM	Analyze issues in connection with previously settled claims following inquiry from Committee as to same.	0.70	\$577.50
03/21/24	MCM	Email correspondence with counsel for claimant that filed late claim in January 2024 regarding discussion about allowance of same (.4); review files in preparation for discussion with counsel (.4).	0.80	\$660.00
03/22/24	KAFA	Analysis of late-filed proof of claim.	0.60	\$237.00
03/22/24	MCM	Conference call with counsel for claimant that filed late claim in January 2024 (.3); analyze issues in connection with applicable standard for excusable neglect (.4); email correspondence with Foley team regarding recommendation for addressing claim (.4); email correspondence with Committee counsel regarding same (.3).	1.40	\$1,155.00
03/24/24	MRL	Email correspondence to M. Moore regarding late-filed claims research.	0.20	\$114.00
03/25/24	MCM	Conference call with counsel for Committee regarding late-filed claim issues (.4); email correspondence with counsel for claimant and Committee to confirm sharing of declarations in support of draft motion (.3); email correspondence with Foley team regarding status of discussions (.3).	1.00	\$825.00
03/26/24	KAFA	Analysis of late-filed proof of claim.	0.20	\$79.00
03/26/24	MCM	Email correspondence regarding analysis of proofs of claim where claimants did not file state-court complaints in compliance with California statute (.3); analyze issues in connection with same (.5); update to Foley team regarding discussions on late-filed claim and strategy for same after consultations with Committee (.3).	1.10	\$907.50
03/27/24	JCH	Review and apply redactions to two proofs of claim filed.	0.80	\$240.00
03/27/24	MCM	Confer with M. Rofaail regarding research into issues concerning statute of limitations and failure to file complaints by claimants pursuant to California state law (.3); review issues related to same (.5).	0.80	\$660.00

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03/27/24	MCM	Email correspondence with Committee counsel and counsel for claimant regarding late-filed claim allowance issues (.3); email update to Foley team regarding same (.2); analyze case law regarding excusable neglect in Ninth Circuit (.5).	1.00	\$825.00
03/27/24	MRL	Confer with M. Moore regarding research on California Emergency Rule 9 (.3); research case law on California Emergency Rule 9 and its applicability to claims that did not file state law suits (2.6).	2.90	\$1,653.00
03/28/24	MCM	Analyze results of research into interplay of California Emergency Rule 9, 11 USC 108(c), and Bar Date Order relating to claims where claimants did not file state-court complaint.	0.50	\$412.50
03/29/24	MCM	Analyze issues in connection with interplay of California Emergency Rule 9, 11 USC 108(c), and Bar Date Order relating to claims where claimants did not file state-court complaint (1.7); telephone conference with M. Lee regarding same (.5).	2.20	\$1,815.00
03/29/24	MDL	Strategize with M. Moore regarding statute of limitations question for certain survivor claims.	0.30	\$240.00
03/29/24	SMP	Research regarding impact of Emergency Rule 9 on statute of limitations.	1.40	\$882.00
		Task Total:	19.00	\$13,199.00

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

03/01/24	JCH	Update daily docket report.	0.50	\$150.00
03/04/24	EPK	Review proposed updated master case calendar and key dates timeline (.1); provide comments to same (.2); review updated master case calendar following additional revisions (.1).	0.40	\$320.00
03/04/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
03/04/24	JSH	Update weekly timeline and slides per case developments and activity on dockets.	0.90	\$630.00

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03/04/24	MDL	Telephone conference with S. Moses to strategize regarding scheduling of hearings on pending and forthcoming motions (.4); email correspondence related to same (.1).	0.50	\$400.00
03/04/24	MRL	Summarize daily docket activity and upcoming deadlines for client report.	0.30	\$171.00
03/05/24	JCH	Update daily docket report.	0.50	\$150.00
03/06/24	EPK	Review information relating to counsel of record for individual Committee members.	0.20	\$160.00
03/06/24	JCH	Update daily docket report.	0.50	\$150.00
03/07/24	EPK	Evaluate next round of Bankruptcy Code deadlines that should potentially be extended (.1); review briefing schedules and reporting obligations coming due in the next two months (.1); review archived documents and communications to evaluate bankruptcy case administration compliance issues (.4).	0.60	\$480.00
03/07/24	JCH	Update daily docket report.	0.50	\$150.00
03/08/24	JCH	Update daily docket report.	0.50	\$150.00
03/08/24	MDL	Telephone conference with A. Ermac regarding hearing schedule for discovery motions and interim fee applications.	0.10	\$80.00
03/09/24	MRL	Summarize daily docket activity and upcoming deadlines for client report.	0.40	\$228.00
03/11/24	JCH	Revise Master Case Calendar and Timeline.	0.80	\$240.00
03/11/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.80	\$560.00
03/12/24	EPK	Review updated master case calendar and key dates timeline.	0.20	\$160.00
03/12/24	JCH	Update daily docket report.	0.50	\$150.00
03/12/24	MRL	Summarize docket activity to update client report.	0.30	\$171.00
03/13/24	JCH	Update daily docket report (.5); calendar updated objection deadlines and hearing dates related to recent filings (.5).	1.00	\$300.00
03/14/24	JCH	Update daily docket report.	0.50	\$150.00

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03/15/24	JCH	Update daily docket report.	0.50	\$150.00
03/15/24	MRL	Summarize daily docket activity and upcoming deadlines for client report.	0.60	\$342.00
03/18/24	EPK	Comment on this week's master case calendar updates (.2); review finalized master case calendar and key dates timeline (.1).	0.30	\$240.00
03/18/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5); calendar response deadline on Westport's Motion for Protective Order and status conference regarding NJ action (.5).	1.50	\$450.00
03/18/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.70	\$490.00
03/18/24	MRL	Summarize docket activity to circulate update for client report (1.0); review email from J. Harrison regarding docket update (.1).	1.10	\$627.00
03/19/24	EPK	Email correspondence with S. Levitt of A&M regarding Rule 2015.3 reporting dates (.2); coordinate with J. Harrison on updates to master calendar relating to same (.1).	0.30	\$240.00
03/19/24	JCH	Update daily docket report (.5); prepare index for today's hearing on interim fee application, compile electronic copies of pleadings and prepare zip file of same (.8).	1.30	\$390.00
03/20/24	EPK	Advise J. Harrison regarding Rule 2015.3 reporting requirements and relevant deadlines (.2); confer with A. Uetz regarding CNO to be filed in connection with unopposed motion to extend lease assumption deadline (.2); work with D. Nichols to prepare draft of CNO (.1).	0.50	\$400.00
03/20/24	JCH	Update daily docket report (.5); calculate and calendar additional deadlines related to Rule 2015.3 reports (.5); email to A. Uetz including summary of matters being heard at April 17 and April 18 hearings in bankruptcy court and district court (.5).	1.50	\$450.00

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03/21/24	JCH	Update daily docket report (.5); prepare Notice of Summary of Wages Expenses for February 2024 (.5); file monthly operating report for February 2024 and Notice of Wages Expenses (.5); calendar response deadlines to LMI and Committee motions filed (.5).	2.00	\$600.00
03/22/24	JCH	Update daily docket report (.2); revise Master Case Calendar (.5).	0.70	\$210.00
03/23/24	MRL	Summarize daily docket activity and upcoming deadlines for client report.	0.30	\$171.00
03/25/24	EPK	Review updated master case calendar and key dates timeline (.2); provide comments on same to J. Harrison and J. Harper (.2).	0.40	\$320.00
03/25/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
03/25/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.60	\$420.00
03/26/24	JCH	Circulate updated Master Case Calendar & Timeline to Foley group (.2); update daily docket report (.5).	0.70	\$210.00
03/26/24	MRL	Summarize docket activity for client report (.6); review email from J. Harrison with RCBO docket update (.1).	0.70	\$399.00
03/27/24	JCH	Update daily docket report.	0.50	\$150.00
03/27/24	SJM	Email correspondence with A. Uetz, M. Lee, and E. Ridley regarding scheduling of upcoming hearings.	0.30	\$225.00
03/28/24	EPK	Review new case dates and deadlines, including review of schedule for ongoing mediation sessions and task list relating to same.	0.30	\$240.00
03/28/24	JCH	Update daily docket report.	0.50	\$150.00
03/29/24	JCH	Update daily docket report.	0.50	\$150.00
03/31/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.30	\$171.00
		Task Total:	28.10	\$12,745.00

007 Chapter 11 Plan/ Plan Confirmation

03/04/24	MCM	Attention to issues regarding insurance neutrality in Camden and other similar cases.	0.50	\$412.50
03/04/24	MRM	Analyze amended plan and disclosure statement in Camden bankruptcy for insurance neutrality language.	1.00	\$570.00
03/05/24	MCM	Attention to issues regarding insurance neutrality in Camden case and revisions to plan language based on objections (.5); email correspondence with Foley team regarding same (.3).	0.80	\$660.00
03/08/24	MCM	Analyze issues in connection with ownership of relics and interplay of free-exercise clause and bankruptcy law in context of same.	0.40	\$330.00
03/11/24	MCM	Analyze issues in connection with ownership of relics and interplay of free-exercise clause and bankruptcy law in context of same.	0.40	\$330.00
03/13/24	ESJ	Correspond with J. Kohout regarding restricted gifts and endowment funds, treatment under California law, California statutes applicable to religious corporations, and creditor protection.	0.50	\$315.00
03/13/24	ESJ	Prepare PowerPoint slides regarding restricted gifts and endowment funds, treatment under California law, and creditor protection.	1.50	\$945.00
03/13/24	ESJ	Research restricted gifts and endowment funds, treatment under California law, and creditor protection.	4.50	\$2,835.00
03/14/24	MCM	Attention to plan issues concerning confirmation of plan in Camden case (.4); email correspondence with Foley team regarding same (.2).	0.60	\$495.00
03/18/24	AMUE	Outline strategy for plan of reorganization.	1.10	\$1,017.50
03/19/24	MCM	Attention to Plan structure and asset-analysis issues in connection with preparation of Plan outline and term sheet.	4.00	\$3,300.00
03/23/24	MCM	Review email correspondence from M. Lee regarding analysis of insurance neutrality issues in connection with plan formulation.	0.40	\$330.00

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03/24/24	MCM	Analyze issues regarding insurance neutrality in connection with plan formulation.	0.60	\$495.00
03/25/24	MCM	Analyze issues regarding insurance neutrality in connection with plan formulation.	1.00	\$825.00
03/29/24	MCM	Analyze recent developments in other diocesan bankruptcy cases in connection with formulation of a plan of reorganization.	1.00	\$825.00
		Task Total:	18.30	\$13,685.00

008 Communications with Client

03/01/24	AMUE	Meeting with P. Bongiovanni regarding SteerCo (.7); meeting with M. Kemner and P. Bongiovanni to discuss how to streamline various tasks for greater efficiency (1.0).	1.70	\$1,572.50
03/04/24	AMUE	Communication with client leadership to prepare for mediation.	0.80	\$740.00
03/05/24	AMUE	Meeting with P. Bongiovanni and C. Moore regarding SteerCo meeting strategy.	0.50	\$462.50
03/05/24	MDL	Telephone conference with P. Bongiovanni regarding Livermore property, documents related to same, and status of efforts to collect estate assets from Bennett Trust.	0.20	\$160.00
03/06/24	AMUE	Multiple (5+) emails with M. Kemner regarding Bishop's meeting with priests (.7); draft outline of talking points for meeting (.6); review email regarding asset discussion with mediator (.2) and respond to same (.2).	1.70	\$1,572.50
03/06/24	JRBL	Telephone conference from P. Bongiovanni regarding mediation.	0.50	\$637.50
03/06/24	MDL	Participate in weekly diligence call with P. Bongiovanni, D. Flanagan (VeraCruz), and A&M personnel.	0.50	\$400.00
03/06/24	MDL	Telephone conference with M. Kemner, P. Bongiovanni, and C. Moore (A&M) regarding property of the estate issues.	1.20	\$960.00

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03/07/24	AMUE	Meeting with P. Bongiovanni, M. Kemner, E. Ridley and A. Armanino regarding insurance strategy and mediation.	1.00	\$925.00
03/07/24	AMUE	Finalize strategy memo update for client.	0.50	\$462.50
03/07/24	ERR	Prepare for (.4) and attend meeting with client representatives regarding status of insurance coverage analysis with M. Kemner, P. Bongiovanni, A. Uetz and A. Armanino (1.0).	1.40	\$1,365.00
03/10/24	AMUE	Review communication received from P. Bongiovanni regarding restricted funds.	0.30	\$277.50
03/10/24	AMUE	Communication with C. de Quesada and client leadership team regarding chapter 11 administration as it relates to various finance tasks designed to make the estate more efficient.	0.30	\$277.50
03/15/24	MCM	Draft email update to client parties concerning confirmation of Camden plan and terms thereof.	0.40	\$330.00
03/20/24	AMUE	Meeting with client team (M. Kemner and P. Bongiovanni), VeraCruz and C. Moore to discuss moving various finance workstreams to achieve greater efficiency for the Debtor.	0.80	\$740.00
03/20/24	AMUE	Communication with P. Bongiovanni regarding real estate issue.	0.40	\$370.00
03/20/24	JRBL	Telephone conference with P. Bongiovanni regarding updates.	0.40	\$510.00
03/20/24	SJM	Attend meeting with client team, VeraCruz, C. Moore and Foley team regarding finance transition plan.	0.70	\$525.00
03/21/24	MDL	Telephone conference with P. Bongiovanni regarding real estate identification and valuation points.	0.60	\$480.00
03/22/24	AMUE	Email communication with M. Kemner regarding mediation (.2); telephone meeting with M. Kemner regarding mediation (.5).	0.70	\$647.50
03/22/24	SJM	Attend finance transition meeting with A. Bardos, P. Bongiovanni, A&M, and VeraCruz.	0.90	\$675.00
03/23/24	MDL	Email correspondence with P. Bongiovanni regarding real estate valuation and cost-proration issue.	0.20	\$160.00

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03/25/24	JRBL	Telephone conference with P. Bongiovanni regarding insurance coverage for sinkhole matter.	0.80	\$1,020.00
03/26/24	MRL	Draft email regarding the status of the case for the client.	0.60	\$342.00
03/27/24	AMUE	Meeting with P. Bongiovanni regarding chapter 11 strategy as it relates to mediation.	0.80	\$740.00
03/27/24	JRBL	Telephone conference with P. Bongiovanni regarding transition issues.	0.50	\$637.50
03/27/24	MRL	Draft email regarding the status of the case for the client (.3); review edits from M. Roberts regarding the email (.3).	0.60	\$342.00
03/27/24	SJM	Participate in meeting with P. Bongiovanni, A. Bardos, VeraCruz, and A&M regarding professional fee payment process (.6); participate in meeting with P. Bongiovanni, A. Bardos, VeraCruz, and A&M regarding plan and Committee diligence process (1.0).	1.60	\$1,200.00
		Task Total:	20.60	\$18,531.50

009 Corporate Governance and Board Issues

03/04/24	EPK	Email correspondence with D. Balaguer of Fish & Richardson to confirm submission of the FCC application relating to CTN registrations (.1); brief review of as-filed ownership change and FCC application forms (.1).	0.20	\$160.00
03/12/24	EPK	Confer with J. Witt and M. Kiel regarding corporate governance issues relating to Adventus (.3); review corporate formation documents for Adventus (.3).	0.60	\$480.00
03/12/24	JAL	Communications with M. Kiel on requested research related to Adventus (.1); review articles of incorporation and other governance materials (.4).	0.50	\$300.00
03/12/24	JPWI	Draft correspondence related to RCBO's interest in third-party entity.	0.50	\$400.00

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03/12/24	MSK	Analysis of Articles of Incorporation of Adventus (.2); work in furtherance of preparing recommendation regarding ownership and control structure of Adventus (.3); correspondence with E. Khatchatourian and J. Witt regarding ownership structure of Adventus (.2).	0.70	\$542.50
03/14/24	EPK	Follow up with M. Kiel regarding analysis of Adventus's corporate and governance structure (.1); review Adventus corporate structure and governance analysis prepared by the Foley corporate team (.2).	0.30	\$240.00
03/14/24	JAL	Analyze Adventus articles of incorporation and bylaws and other available governance documents (1.4); prepare summary findings for M. Kiel's review (.4).	1.80	\$1,080.00
03/14/24	JPWI	Draft correspondence related to RCBO's interest in Adventus entity.	0.70	\$560.00
03/14/24	MSK	Analysis of Articles of Incorporation, Bylaws and related corporate documentation of Adventus (.4); analysis of California nonprofit public benefit corporation statutes in connection with ownership and control analysis of Adventus (.6); draft summary and recommendation regarding Adventus control and ownership (.6); correspondence with E. Khatchatourian and J. Witt regarding ownership structure of Adventus (.3).	1.90	\$1,472.50
03/18/24	JPWI	Review assets summary slide deck (.3) and draft correspondence related to same (.2).	0.50	\$400.00
03/18/24	JRBL	Respond to auditor requests for information.	0.20	\$255.00
03/18/24	KTLE	Review request from auditor for update to audit response letter for FYE 12.31.22 (.1); emails to and from timekeepers regarding updates to prior audit response letter (.2); prepare draft audit response letter update (.3); update audit files (.1).	0.70	\$290.50
03/19/24	KTLE	Emails to and from timekeepers regarding disclosures for audit response letter update.	0.20	\$83.00
03/20/24	KTLE	Emails to and from timekeepers regarding disclosures for update to audit response letter.	0.20	\$83.00

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03/21/24	EPK	Review corporate governance analysis for certain Non-Debtor Catholic Entities.	0.20	\$160.00
03/23/24	MDL	Draft update to Moss Adams regarding claims asserted in bankruptcy against RCBO.	0.20	\$160.00
03/25/24	KTLE	Emails to and from timekeepers regarding disclosures for update to audit response letter (.1); continue preparation of audit response letter update (.2); update audit files (.1).	0.40	\$166.00
03/28/24	AJHE	Approve audit letter response.	0.20	\$155.00
03/28/24	KTLE	Emails to and from timekeepers regarding disclosures for update to audit response letter(.2); finalize audit response letter update and send to client and auditor (.4); update audit files (.1).	0.70	\$290.50
		Task Total:	10.70	\$7,278.00

011 Cash Management

03/04/24	EPK	Coordinate with the A&M team regarding status of incremental restricted cash documentation collection and substantiation process (.2); review email from P. Bongiovanni regarding updated restricted cash substantiation communication to the parishes (.1); comment on form of proposed communication (.2); conference call with RCBO, Foley, and A&M teams regarding updates to the restricted cash substantiation process and other cash management issues (.5).	1.00	\$800.00
03/06/24	EPK	Communications with R. Medeiros and P. Bongiovanni regarding handling of certain donations from foundations.	0.40	\$320.00
03/10/24	EPK	Review update from P. Bongiovanni regarding next round of restricted assets documentation to be collected from parishes.	0.10	\$80.00
03/12/24	EPK	Email correspondence with J. Kohout regarding ongoing analysis of restricted cash holdings and legal support for same (.3); review spreadsheet summarizing prior analysis of parish cash (.4); coordination call with J. Kohout to review legal arguments relating to restricted cash and donations (.6).	1.30	\$1,040.00

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03/12/24	JJK	Conference with E. Khatchaturian regarding restricted gift law and research.	0.60	\$525.00
03/13/24	JJK	Review legal analysis for gifting.	0.90	\$787.50
03/14/24	JJK	Review gift agreements for restricted gift analysis.	0.60	\$525.00
03/25/24	EPK	Conference call with the RCBO, Foley, and A&M teams to review parish cash substantiation criteria and status of collection and analysis of additional documents from churches.	0.40	\$320.00
03/29/24	MDL	Telephone conference with S. Moses regarding notice to Committee and U.S. Trustee of CCCEB quarterly rent payment.	0.10	\$80.00
03/29/24	SJM	Prepare notice to Committee and U.S. Trustee regarding quarterly CCCEB Payment.	0.40	\$300.00
		Task Total:	5.80	\$4,777.50

013 Employee Issues

03/19/24	JSH	Research and analyze LTC payment provisions issues for M. Lee.	0.80	\$560.00
03/19/24	MRL	Review Relativity for Priest Long Term Care fund documents (.2); email correspondence with the Foley team regarding the same (.2).	0.40	\$228.00
		Task Total:	1.20	\$788.00

014 Exclusivity

03/20/24	EPK	Assess requirements for further extension of plan exclusivity period.	0.20	\$160.00
03/24/24	SJM	Begin drafting third motion to extend exclusivity.	1.60	\$1,200.00
		Task Total:	1.80	\$1,360.00

015 Executory Contracts/ Lease Issues

03/04/24	MDL	Revise motion to extend lease assumption deadline and supporting papers.	0.70	\$560.00
03/06/24	JCH	File Second Stipulation related to extension of lease assumption/rejection deadline (.2); file related Third Motion to Extend Deadline to Assume or Reject CCCEB lease, Bongiovanni Declaration and Notice of Hearing (.5).	0.70	\$210.00
03/06/24	SJM	Finalize motion to extend time to assume CCCEB lease and supporting papers.	0.40	\$300.00
03/20/24	JCH	Prepare certificate of no objection regarding Debtor's Third Motion to Extend Deadline to Assume or Reject Lease.	0.50	\$150.00
03/21/24	EPK	Revise the CNO for the unopposed motion to extend lease-assumption deadline (.2); coordinate with J. Harrison and S. Moses regarding timing for filing of same and related communication with the bankruptcy court (.3); revise proposed order extending lease-assumption deadline (.2).	0.70	\$560.00
03/21/24	SJM	Respond to E. Khatchaturian regarding status of motion to extend time to assume CCCEB lease.	0.20	\$150.00
03/22/24	EPK	Follow up with S. Moses and J. Harrison regarding filing of CNO for lease assumption deadline motion and related communications with the bankruptcy court.	0.30	\$240.00
03/25/24	EPK	Follow up on filing of CNO for unopposed motion to extend deadline and uploading of related proposed order.	0.30	\$240.00
03/25/24	JCH	File certificate of no objection and upload proposed order regarding Debtors' Third Motion to Extend Assumption/Rejection deadline.	0.50	\$150.00
03/26/24	EPK	Follow up on entry of order extending lease assumption deadline (.1); review reminders relating to and docketing of extended deadline (.1).	0.20	\$160.00
03/26/24	JCH	Calendar updated deadlines related to Lease Assumption/Rejection.	0.50	\$150.00

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03/26/24	SJM	Review entered order extending time to assume CCCEB lease (.2); confirm dates for further motion to extend time if needed (.2).	0.40	\$300.00
03/27/24	EPK	Follow up on entry of lease assumption deadline extension order and cancellation of hearing (.2); Foley restructuring team email correspondence regarding same (.2).	0.40	\$320.00
		Task Total:	5.80	\$3,490.00

016 General Case Strategy (includes team calls)

03/01/24	MCM	Review email correspondence regarding recent case developments in other diocesan bankruptcy cases.	0.30	\$247.50
03/01/24	TFCA	Review updated article on Rockville plan.	0.30	\$397.50
03/04/24	AMUE	Review upcoming case deadlines (0.2) and outline strategy regarding same, including insurance adversary proceeding and exclusivity (0.9).	1.10	\$1,017.50
03/04/24	SJM	Telephone call with M. Lee regarding CCCEB lease motion and planning for upcoming filings and hearings (.4); draft email summary of upcoming matters and planning issues for case team (.9); email to J. Harrison regarding upcoming deadlines (.3); email correspondence with A. Uetz regarding status of fee examiner motion and implications for pending fee applications (.2).	1.80	\$1,350.00
03/04/24	TFCA	Analyze TV presentation regarding SF/Oakland clergy abuse for team.	0.50	\$662.50
03/05/24	MRL	Summarize docket activity to circulate update to team.	0.40	\$228.00
03/05/24	TFCA	Review update from A. Uetz (.2); telephone call with J. Blease regarding same (.2).	0.40	\$530.00
03/06/24	MDL	Draft list of discussion points for Bishop Barber in meeting with priests.	0.30	\$240.00
03/06/24	SJM	Respond to A. Uetz regarding counsel for Committee members.	0.30	\$225.00

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03/07/24	MDL	Evaluate Canon Law considerations with respect to relics, artifacts, and art.	0.20	\$160.00
03/11/24	SJM	Prepare email to A. Uetz regarding upcoming hearings and filings.	1.10	\$825.00
03/12/24	AMUE	Review finance deliverables related to cash management order for the purpose of reassigning same to achieve greater efficiency in case.	0.90	\$832.50
03/12/24	AMUE	Meeting with C. Moore regarding transition of work to VeraCruz and finance team to achieve greater efficiency.	0.50	\$462.50
03/13/24	SJM	Email correspondence with A. Uetz, E. Ridley, and M. Lee regarding scheduling and appearances for upcoming hearings (.3); review current district court procedures regarding remote and in-person appearance for hearings (.4).	0.70	\$525.00
03/14/24	MRL	Review weekly update.	0.20	\$114.00
03/17/24	MRL	Summarize daily docket activity and upcoming deadlines for team.	0.80	\$456.00
03/19/24	MDL	Strategize with A. Uetz for hearing on fee applications and on issue of Committee protective order.	0.20	\$160.00
03/19/24	SJM	Prepare email to A. Uetz detailing status of Santa Rosa case and mediation efforts (.7); prepare email to A. Uetz detailing status of San Francisco case and mediation efforts (.5); further email regarding San Francisco case discovery disputes (.2); respond to email from A. Uetz regarding discussion of RCC loan (.2); respond to email from A. Uetz regarding confirmation of total fee requests in case to date (.2).	1.80	\$1,350.00
03/21/24	MCM	Analyze legal and factual issues raised by Committee at mediation regarding obligated group (.4); draft email correspondence with Foley team summarizing responses to same (.3).	0.70	\$577.50
03/21/24	MDL	Evaluate property of the estate issue with respect to Non-Debtor Catholic Entities targeted by Committee.	0.30	\$240.00
		Task Total:	12.80	\$10,600.50

017 Hearings and Court Matters

03/19/24	AMUE	Prepare for hearing on status conference regarding insurance adversary proceedings and U.S. Trustee's objections to fee applications.	2.70	\$2,497.50
03/19/24	AMUE	Attend single court hearing regarding multiple matters, including status conference on insurance issues, Committee's motion for further protective order and U.S. Trustee's objection to fee applications (1.0) and prepare for same (1.8).	2.80	\$2,590.00
		Task Total:	5.50	\$5,087.50

018 Non-Bankruptcy Litigation

03/22/24	EPK	Brief review of JCCP case management statement.	0.10	\$80.00
03/27/24	EPK	Review JCCP 5108 notices provided by A. Ouellette (.2); listen to CMC in JCCP 5108 to ascertain bankruptcy-related issues that affect RCBO (1.4).	1.60	\$1,280.00
03/28/24	EPK	Review email correspondence with institutional defendants' liaison counsel, D. Zamora, regarding JCCP CMC schedule.	0.10	\$80.00
		Task Total:	1.80	\$1,440.00

020 Retention/Billing/Fee Applications for Debtor Professionals

03/06/24	MDL	Email exchange with Foley team regarding timing of monthly payments of professional fees.	0.30	\$240.00
03/07/24	SJM	Summarize U.S. Trustee objections to Foley and A&M applications for A. Uetz and M. Lee (.6); respond to email from A. Uetz regarding implications of fee examiner motion for objections and timing of hearing/replies (.3); telephone call with B. Weisenberg regarding schedule for hearing on fee applications (.2); email to A. Uetz summarizing call with Committee counsel (.2).	1.30	\$975.00

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03/11/24	MDL	Revise stipulation and order to extend deadline for replying to U.S. Trustee's objections to Foley second interim fee application.	0.10	\$80.00
03/11/24	SJM	Draft stipulation to continue deadline to respond to U.S. Trustee objections to fee applications (.8); email correspondence with J. Blumberg regarding stipulation (.3).	1.10	\$825.00
03/12/24	JCH	Prepare and file certificates of no objection for Foley and A&M January monthly fee statements.	0.80	\$240.00
03/12/24	SJM	Review draft CNOs for Foley and A&M monthly fee statements (.3); email correspondence with C. Moore regarding A&M monthly statement (.2).	0.50	\$375.00
03/13/24	JCH	Prepare chart of interim amounts owed to professionals and email same to M. Lee.	0.50	\$150.00
03/13/24	MDL	Email exchange with Lowenstein (B. Weisenberg, J. Prol) regarding payment of January fee statements, missing CNOs by Committee professionals, and resolution of U.S. Trustee's objections to Foley's fee application.	0.20	\$160.00
03/14/24	JCH	Prepare draft Notice of Agreement with U.S. Trustee regarding reductions of fees in interim fee applications.	1.50	\$450.00
03/14/24	TND	Begin preparation of information for Foley's February fee statement to ensure compliance with U.S. Trustee Guidelines.	0.50	\$367.50
03/15/24	JCH	Revisions to Notice of Partial Resolutions to U.S. Trustee objections to interim fee applications (.8); finalize Notice (.5).	1.30	\$390.00
03/15/24	SJM	Prepare notice of agreed reductions to fee applications (2.2); email correspondence with Committee counsel and other professionals regarding same (.6); revise notice based on additional resolutions (.7); prepare supplemental notice (.6).	4.10	\$3,075.00
03/15/24	TND	Review information needed for February fee statement to ensure U.S. Trustee guideline compliance.	0.20	\$147.00
03/16/24	SJM	Prepare notice of errata regarding A&M reply to objection to fee application.	0.40	\$300.00

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03/16/24	TND	Revise information for Foley February monthly fee statement to ensure compliance with U.S. Trustee Guidelines.	0.40	\$294.00
03/18/24	TND	Further preparation of Foley February fee application to ensure compliance with U.S. Trustee guidelines.	2.20	\$1,617.00
03/19/24	SJM	Prepare draft combined order granting fee applications (1.4); email correspondence with Committee counsel regarding form of order (.3).	1.70	\$1,275.00
03/19/24	TND	Further preparation of February Foley fee statement to ensure compliance with U.S. Trustee guidelines.	3.80	\$2,793.00
03/20/24	SJM	Revise proposed fee order based on Committee comments (.8); email correspondence with J. Bair regarding allocation of Burns Bair agreed reduction (.2); email to J. Blumberg regarding approval of draft order (.1); finalize form of order (.2).	1.30	\$975.00
03/20/24	TND	Further preparation of information needed for Foley's February monthly statement to ensure compliance with U.S. Trustee guidelines.	2.10	\$1,543.50
03/21/24	TND	Further preparation of Foley February fee statement to ensure U.S. Trustee guideline compliance.	0.70	\$514.50
03/22/24	JSH	Work on monthly fee statement to ensure compliance with UST guidelines.	0.30	\$210.00
03/22/24	TND	Follow up with J. Harper to ensure coverage for finalization of February fee statement (.2); respond to inquiry from A. Uetz on fee increases of other case professionals (.1).	0.30	\$220.50
03/27/24	AMUE	Revise monthly fee statement to ensure compliance with UST fee guidelines.	1.20	\$1,110.00
03/27/24	TND	Review A&M February fee statement for compliance with U.S. Trustee guidelines.	0.20	\$147.00
03/28/24	JCH	Prepare information for Foley monthly fee statement to ensure compliance with UST Guidelines (.8); prepare draft of Foley's monthly fee statement for February 2024 (.8).	1.60	\$480.00

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03/28/24	JSH	Work on monthly fee statement cover sheet updates and notice.	1.00	\$700.00
03/28/24	SJM	Email correspondence with A. Uetz and J. Blease regarding order on fee applications.	0.40	\$300.00
03/28/24	TND	Email correspondence with J. Harrison regarding filing of A&M February monthly fee statement.	0.20	\$147.00
03/29/24	JCH	File Foley and A&M's monthly fee statements for February 2024.	0.50	\$150.00
03/29/24	JSH	Coordinate filing of monthly fee statement.	0.10	\$70.00
03/29/24	SJM	Review A&M monthly fee statement (.3); revise draft Foley monthly fee statement provisions regarding notice of fee increase (.4).	0.70	\$525.00
Task Total:			31.50	\$20,846.00

021 Retention/Fee Applications: Ordinary Course Professionals

03/07/24	TND	Analyze need for increased OCP cap (.2); review Kemner invoice (.2).	0.40	\$294.00
03/08/24	TND	Discuss OCP cap matters and related issues with A. Uetz.	0.20	\$147.00
03/11/24	TND	Respond to emails from S. Levitt and A. Uetz regarding OCP cap matters.	0.20	\$147.00
03/12/24	TND	Correspondence with A. Uetz regarding potential need for increased OCP cap and motion for same.	0.20	\$147.00
03/18/24	TND	Review issues related to increase in OCP cap (.3); email correspondence with A. Uetz regarding motion on same (.2); email to IAS regarding OCP retention and fees (.1).	0.60	\$441.00
03/20/24	TND	Begin preparation of motion to increase OCP cap.	0.40	\$294.00
03/21/24	TND	Further drafting of motion to increase OCP caps and proposed order regarding same.	2.10	\$1,543.50
03/23/24	MDL	Correspondence with Lowenstein (B. Weisenberg, C. Restel) regarding VeraCruz February 2024 invoice.	0.10	\$80.00
Task Total:			4.20	\$3,093.50

022 Retention/Fee Applications: Other Professionals

03/01/24	TND	Correspondence with Judge Sontchi's office regarding payment of mediation expenses (.2); correspondence with J. Krivis's office regarding payment of mediation expenses (.2); correspondence with A&M regarding same (.2).	0.60	\$441.00
03/05/24	TND	Communications with A&M regarding Krivis W-9 and payment information (.1); email to C. Hoxie regarding Krivis wire transfer information (.1).	0.20	\$147.00
03/06/24	TND	Email correspondence with C. Hoxie regarding payment method for Krivis fees (.3); email correspondence with C. Szymanski regarding payment of Sontchi fees (.2); email correspondence with S. Loop regarding mediator payments (.2); call with S. Loop regarding same (.1); review docket for mediator fee statement and CNO filings (.1).	0.90	\$661.50
03/07/24	TND	Email with J. Krivis office regarding payment of invoices.	0.10	\$73.50
03/11/24	TND	Email with C. Szymanski regarding interim fee application process and fee guidelines (.1); respond to email from G. Albert regarding Committee member expenses (.1); email to P. Bongiovanni regarding Committee member expenses (.1).	0.30	\$220.50
03/26/24	JCH	Prepare chart listing allowed amounts, payments and amounts outstanding regarding interim fee applications of professionals.	0.80	\$240.00
03/26/24	SJM	Draft email to P. Bongiovanni regarding approval of interim fee applications and payments to be made.	0.80	\$600.00
		Task Total:	3.70	\$2,383.50

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

03/06/24	MDL	Email correspondence with K. McAbee (U.S. Trustee's Office) regarding insurance certificates she requested.	0.10	\$80.00
03/19/24	EPK	Preliminary review of the February 2024 MOR package prepared by the A&M team.	0.20	\$160.00
03/20/24	EPK	Review February 2024 MOR package prepared by the A&M team (.4); email correspondence with P. Bongiovanni and the A&M team regarding comments to same (.1); coordinate with J. Harrison regarding preparation of February 2024 MOR documents and wages order reporting documents for filing tomorrow (.1).	0.60	\$480.00
03/21/24	EPK	Short call with P. Bongiovanni and the A&M team to review and finalize the February MOR for filing today (.2); review proposed final version of February 2024 MOR package for filing and service today (.2); coordinate with J. Harrison to prepare February 2024 MOR package and wages order reporting documents for filing and service (.2).	0.60	\$480.00
03/22/24	EPK	Email correspondence to counsel for the U.S. Trustee and the Committee regarding wages order reporting documents for February 2024.	0.10	\$80.00
03/25/24	EPK	Email correspondence with S. Levitt of A&M regarding description of certain payments in monthly operating reports (.1); confer with A. Uetz and M. Lee regarding same (.1).	0.20	\$160.00
03/26/24	EPK	Confer with M. Lee regarding reporting of certain payments (.1); coordinate with S. Levitt of A&M with respect to reporting of same in next MOR (.1).	0.20	\$160.00
		Task Total:	2.00	\$1,600.00

026 Unsecured Creditor Issues/Communications/Meetings

03/04/24	MCM	Email correspondence with counsel for Committee regarding claims inquiry.	0.30	\$247.50
03/05/24	AMUE	Two telephone meetings with B. Weisenberg regarding mediation issues.	0.80	\$740.00
03/21/24	SJM	Respond to Committee counsel regarding status of March 27 scheduled hearings.	0.10	\$75.00
Task Total:			1.20	\$1,062.50

027 Real Estate and Real Property Issues

03/24/24	EPK	Evaluate issues relating to sale of former convent owned by Non-Debtor Catholic Entity.	0.30	\$240.00
03/25/24	JRBL	Analysis of potential insurance coverage for expenses related to sinkhole per client request.	1.60	\$2,040.00
Task Total:			1.90	\$2,280.00

031 Insurance Issues (coverage, includes adversary proceeding)

03/03/24	ERR	Edit opposition briefs to primary insurers' motion to dismiss, excess insurers' motion to dismiss and CIGA motion to dismiss.	3.20	\$3,120.00
03/04/24	AMUE	Provide revisions to response to motion to dismiss filed by CIGA (which for efficiency will carry over to the other responses).	1.80	\$1,665.00
03/04/24	DMH	Strategize approach for obtaining confidentiality agreement from AJG regarding proofs of claim and preparing supplemental tender packets for proofs to insurers.	0.40	\$190.00
03/04/24	JCH	Calendar hearing and response deadlines related to LMI's motions related to appeal (.5); email correspondence with S. Moses regarding pro hac vice applications for A. Uetz and M. Lee in the District Court cases (.5); prepare draft pro hac application for A. Uetz in District Court case (.5).	1.50	\$450.00

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03/04/24	KRD	Revise opposition to CIGA's motion to dismiss (.1); revise opposition to primary insurers' motion to dismiss (.2); revise opposition to excess insurers' motion to dismiss (.1); correspondence with A. Uetz and E. Ridley regarding oppositions to pending motions to dismiss (.1).	0.50	\$342.50
03/04/24	MDL	Revise brief in opposition to CIGA's motion to dismiss.	0.60	\$480.00
03/04/24	MDL	Revise brief in opposition to primary carrier defendants' motions to dismiss.	0.80	\$640.00
03/04/24	MDL	Revise brief in opposition to excess carriers' motions to dismiss.	0.60	\$480.00
03/04/24	SJM	Email correspondence with case team regarding need to file new pro hac vice applications in District Court (.3); research District local rules regarding pro hac vice applications (.6); revise draft pro hac vice application including to address prior approval in bankruptcy court (.4); email to A. Uetz regarding pro hac vice application (.1).	1.40	\$1,050.00
03/05/24	DMH	Analyze tender responses from Chubb to update claims analysis document based on Chubb's coverage position per claim.	3.90	\$1,852.50
03/05/24	ERR	Edit opposition to motion to dismiss regarding CIGA.	0.80	\$780.00
03/05/24	ERR	Review issues regarding recent motions by insurers regarding discovery of insurer reserves.	0.60	\$585.00
03/05/24	JCH	Finalize opposition brief to CIGA's motion to dismiss.	0.80	\$240.00
03/05/24	KRD	Revise opposition to CIGA's motion to dismiss (1.8); communications with M. Lee regarding oppositions to the pending motions to dismiss (.2); analysis regarding strategy for the opposition to excess insurers' motion to dismiss (.5).	2.50	\$1,712.50
03/05/24	MCM	Email correspondence with Foley team regarding tendering of claims in context of Bar Date Order and confidentiality procedures.	0.40	\$330.00
03/05/24	MDL	Provide instruction to J. Harrison regarding filing of brief in opposition to motion to dismiss.	0.10	\$80.00

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03/05/24	MDL	Draft insert to motion to dismiss opposition for argument in response to excess carriers' motion to dismiss argument on allegations justifying dropping down into coverage.	0.30	\$240.00
03/05/24	MDL	Correspondence with J. Bair and T. Burns (Burns Bair) regarding brief in opposition to CIGA motion to dismiss.	0.10	\$80.00
03/05/24	MDL	Telephone conference with E. Ridley and A. Uetz regarding response to excess carriers' motion to dismiss argument on allegations justifying dropping down into coverage.	0.70	\$560.00
03/05/24	MDL	Evaluate argument in response to excess carriers' motion to dismiss argument on allegations justifying dropping down into coverage.	0.50	\$400.00
03/05/24	MRL	Email correspondence regarding the opposition to the defendants' motion to dismiss case.	0.20	\$114.00
03/05/24	SJM	Respond to questions regarding CIGA motion to dismiss third amended complaint in connection with finalizing opposition to same (.2); respond to emails from J. Harrison regarding exhibits to opposition to motion to dismiss (.2).	0.40	\$300.00
03/06/24	AMUE	Outline matters concerning motion to withdraw the reference for client communication regarding insurance coverage strategy.	0.80	\$740.00
03/06/24	AMUE	Review email received from M. Plevin regarding motions to dismiss (.1); caucus with M. Lee regarding same (.3); respond to M. Plevin (.2).	0.60	\$555.00
03/06/24	DMH	Prepare supplemental tender packets to insurers to tender proofs of claim filed against RCBO.	3.80	\$1,805.00
03/06/24	DMH	Update policy analysis document based on recent responses to claim tenders by Chubb.	2.00	\$950.00
03/06/24	EPK	Assess status of the order withdrawing the reference and briefing schedule relating to the motions to dismiss.	0.20	\$160.00
03/06/24	ERR	Respond to M. Kemner regarding discussion with claimant's insurer representative.	0.20	\$195.00
03/06/24	ERR	Review coverage issues and responses to motions to dismiss (in light of withdrawal of reference).	0.60	\$585.00

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03/06/24	ERR	Review status of tenders regarding proofs of claim.	0.40	\$390.00
03/06/24	MCM	Attention to issues regarding tender of redacted claims pursuant to Bar Date Order.	0.50	\$412.50
03/06/24	MDL	Email exchange with counsel for insurers regarding motion to dismiss briefing and hearing schedule.	0.30	\$240.00
03/06/24	MDL	Telephone conference with A. Ermac regarding filing of motion to dismiss response in bankruptcy court.	0.20	\$160.00
03/06/24	MDL	Strategize with A. Uetz regarding insurers' challenge to RCBO's filing of response brief to motion to dismiss in bankruptcy court.	0.10	\$80.00
03/07/24	AMUE	Provide advice to Debtor insurance team regarding production of proofs of claim per bar date order.	0.70	\$647.50
03/07/24	AMUE	Review solvency of various insurers (.3) and provide advice to client leadership regarding same (.3).	0.60	\$555.00
03/07/24	DMH	Analyze proofs of claim (1.4) and prepare documents for tendering proofs to insurers through AJG (2.3).	3.70	\$1,757.50
03/07/24	MDL	Provide instruction to M. Roberts regarding verification of production of notices of tender to insurer defendants.	0.10	\$80.00
03/08/24	AMUE	Communications with M. Kemner regarding insurance coverage issue.	0.70	\$647.50
03/08/24	DAAB	Confer with D. Habib regarding best practices for tendering proofs of claim.	0.20	\$126.00
03/08/24	DMH	Prepare supplemental tender letters to broker to tender proofs of claim against RCBO to insurers.	1.30	\$617.50
03/08/24	DMH	Analyze letter from Lloyd's claiming that RCBO has not tendered any claims to them (.4) and strategize response (.8).	1.20	\$570.00
03/08/24	JCH	Prepare pro hac applications for M. Lee and A. Uetz in appeal cases.	0.50	\$150.00

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03/08/24	SJM	Review final drafts of pro hac applications for A. Uetz and M. Lee for District Court matters (.2); email to A. Uetz and M. Lee regarding final approval of same (.1).	0.30	\$225.00
03/11/24	AMUE	Review question from M. Kemner regarding insurance coverage (.2) and outline response to same (.3).	0.50	\$462.50
03/11/24	DAAB	Confer with D. Habib regarding relevant redaction requirements (0.4) and begin preparing supplemental insurance tenders for proofs of claim accordingly (1.8).	2.20	\$1,386.00
03/11/24	DMH	Prepare supplemental tender packets, including redacted proofs of claim and tender letter, to tender proofs of claim to insurers.	2.80	\$1,330.00
03/12/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	3.40	\$2,142.00
03/12/24	DMH	Prepare supplemental tender packets, including redacted proof of claim and tender letter, to tender proofs of claim to insurers.	3.00	\$1,425.00
03/12/24	KAFA	Preparation of documents to produce to the insurers.	1.80	\$711.00
03/12/24	KRD	Review opposition to excess insurers' motion to dismiss (.1); correspondence with A. Uetz, M. Lee, and E. Ridley regarding edits to opposition to excess insurers' motion to dismiss (.1).	0.20	\$137.00
03/12/24	MDL	Revise response to excess insurers' motion to dismiss.	0.20	\$160.00
03/12/24	MDL	Revise response to primary insurers' motion to dismiss.	0.20	\$160.00
03/12/24	SJM	Finalize pro hac applications for District Court matters.	0.40	\$300.00
03/13/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	5.60	\$3,528.00
03/13/24	DMH	Prepare supplemental tender packets to tender bankruptcy proofs of claim to insurers.	3.00	\$1,425.00
03/13/24	DMH	Revise RCBO's opposition to primary insurers' motion to dismiss adversary complaint.	1.80	\$855.00

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03/13/24	JCH	Finalize Debtor's oppositions to motions to dismiss in adversary proceeding.	0.80	\$240.00
03/13/24	KRD	Revise opposition brief to excess insurers' motion to dismiss (2.4); correspondence with M. Lee regarding same (.2).	2.60	\$1,781.00
03/13/24	MDL	Correspondence with J. Bair (Burns Bair) regarding drafts of briefs in opposition to excess carriers' and primary carriers' motions to dismiss.	0.10	\$80.00
03/13/24	MDL	Email exchange with Foley team (D. Habib, K. Dedrickson, E. Ridley) regarding finalizing briefs in opposition to excess carriers' and primary carriers' motions to dismiss.	0.30	\$240.00
03/13/24	RTST	Work on document production to the insurers.	0.60	\$444.00
03/14/24	AMUE	Review communications regarding motion to withdraw the reference and assignment of cases to federal district court.	0.50	\$462.50
03/14/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	3.00	\$1,890.00
03/14/24	DMH	Prepare supplemental claim packets to tender proofs of claim to insurers.	3.50	\$1,662.50
03/14/24	EPK	Assess status of insurance adversary proceedings and potential withdrawal of the reference with respect to those proceedings.	0.20	\$160.00
03/14/24	ERR	Review status of hearings on motions to dismiss by insurers in light of motion to withdraw reference.	0.50	\$487.50
03/14/24	MDL	Email exchange with M. Plevin (Crowell & Moring) regarding briefing schedule on motions to dismiss.	0.30	\$240.00
03/14/24	MDL	Telephone conference with S. Moses regarding status of motions to dismiss in light of communications from A. Ermac and pendency of motion to withdraw reference.	0.30	\$240.00
03/14/24	MDL	Evaluate email from A. Ermac regarding briefing schedule on motions to dismiss and hearing on same.	0.10	\$80.00

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03/14/24	SJM	Review bankruptcy and district court dockets to confirm status of upcoming hearings on insurance related matters (.8); email to A. Uetz, E. Ridley, and M. Lee regarding upcoming deadlines and schedule of hearings (.6); telephone call with M. Lee regarding opposition deadlines for motions to dismiss (.2).	1.60	\$1,200.00
03/15/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.60	\$1,008.00
03/15/24	ERR	Review reservation letters from LMI.	0.50	\$487.50
03/15/24	ERR	Create coverage analysis valuation and provide to M. Kemner and P. Bongiovanni.	3.00	\$2,925.00
03/17/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.60	\$1,638.00
03/18/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	3.90	\$2,457.00
03/18/24	DMH	Analyze briefing in Archdiocese of New York case to prepare memorandum summarizing case and analyzing applicability to RCBO case.	2.00	\$950.00
03/18/24	ERR	Review case strategy regarding upcoming mediation, district court hearings and coverage analysis.	0.50	\$487.50
03/18/24	ERR	Review orders by District Court regarding withdrawal of reference and setting of status conference.	0.90	\$877.50
03/18/24	ERR	Review additional reservation now rights letters from LMI on various underlying claims.	0.60	\$585.00
03/18/24	JCH	Calendar case management conferences and related deadlines in Lloyd's and Pacific's District Court appeals cases.	0.50	\$150.00
03/18/24	SJM	Review order withdrawing the reference for insurance adversary (.2); email correspondence with case team on scheduling in light of same (.3); respond to A. Uetz regarding status of April 21 hearings (.2).	0.70	\$525.00
03/19/24	DMH	Analyze briefing in Archdiocese of New York case to prepare memorandum on applicability to RCBO's case.	1.80	\$855.00

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03/19/24	ERR	Review orders regarding pending discovery disputes between insurers and Committee.	0.50	\$487.50
03/20/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	3.00	\$1,890.00
03/20/24	DMH	Analyze New York state court decision in case involving Archdiocese of New York on insurers' declaratory judgment action against ADNY.	1.40	\$665.00
03/20/24	DMH	Prepare memorandum analyzing decision from New York state court in case involving Archdiocese of New York, on similar motion as motions to dismiss facing RCBO.	4.20	\$1,995.00
03/20/24	ERR	Review upcoming hearings and case strategy regarding mediation.	0.50	\$487.50
03/20/24	ERR	Review reply briefs in support of insurers' motions to dismiss.	1.20	\$1,170.00
03/20/24	MCM	Analyze issues in connection with production of proofs of claim to insurers in light of Court order regarding protection of information (.4); email correspondence regarding same (.3).	0.70	\$577.50
03/21/24	AMUE	Review insurance neutral language from other confirmed plans.	0.80	\$740.00
03/21/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.20	\$756.00
03/21/24	DMH	Update matrix of insurance coverage and policy analysis document based on recent insurer responses.	2.20	\$1,045.00
03/21/24	ERR	Review district court order regarding pending motions to dismiss.	0.40	\$390.00
03/21/24	SJM	Respond to A. Uetz regarding prior briefing on insurer right to discovery of Committee matters.	0.20	\$150.00
03/22/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.20	\$1,386.00
03/22/24	DMH	Prepare supplemental claim tender letters for proofs of claim, to tender proofs to insurers.	2.20	\$1,045.00
03/22/24	MR	Communicate with J. Breall regarding motion to withdraw the reference in matter involving American Home.	0.10	\$69.00

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03/22/24	SJM	Email to J. Breall regarding non-oppositions to motions to withdraw the reference.	0.30	\$225.00
03/23/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.60	\$1,008.00
03/24/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.20	\$1,386.00
03/25/24	AMUE	Review multiple (4+) emails with insurers and Committee regarding insurer objections to producing information (.4) and provide advice to Foley team regarding same (.4).	0.80	\$740.00
03/25/24	DMH	Prepare supplemental tender letters to broker to tender bankruptcy proofs of claim to insurers.	0.50	\$237.50
03/25/24	ERR	Review reply briefs by insurers regarding motion to dismiss.	1.10	\$1,072.50
03/25/24	MCM	Attention to issues concerning production of redacted proofs of claim to insurers.	0.50	\$412.50
03/25/24	MRL	Email correspondence from A. Uetz regarding the partial summary judgment in the AP case.	0.10	\$57.00
03/25/24	RTST	Work on preparing documents for production to the insurers.	1.00	\$740.00
03/26/24	AMUE	Review emails between insurers and Committee regarding pending motions (.4); outline response concerning relevance of reserve information (.6); analyze research completed by M. Roberts regarding same (.3).	1.30	\$1,202.50
03/26/24	DAAB	Confer with M. Lee, R. Stewart, and D. Habib regarding production of proofs of claim to claimants' counsel (.7); continue preparing supplemental tenders for proofs of claim (.5).	1.20	\$756.00
03/26/24	DMH	Attend strategy call with M. Moore, R. Stewart, and D. Abbasi on finalizing process to tender and produce proofs of claim to insurers.	0.70	\$332.50
03/26/24	ERR	Review coverage analysis regarding discoverability of reserve information from insurers.	0.80	\$780.00
03/26/24	KAFA	Prepare proofs of claim for production.	0.60	\$237.00

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03/26/24	MCM	Attention to issues regarding execution of confidentiality agreements by insurer parties in preparation for production of redacted proofs of claim (.9); email correspondence regarding redaction of subsequent amended or untimely proofs of claim prior to production (.4); work on issues in connection with production size following reconciliation of claims (.5); confer with Foley team regarding necessary next steps prior to production (.4).	2.20	\$1,815.00
03/26/24	MDL	Email exchange with B. Curet (Sinnott Puebla) regarding production of proofs of claim.	0.10	\$80.00
03/26/24	MDL	Email exchange with M. Moore and R. Stewart regarding procedures for production of proofs of claim and assurances of confidential treatment of same.	0.20	\$160.00
03/26/24	MR	Plan for outlining and drafting motion for partial summary judgment in adversary proceeding.	0.50	\$345.00
03/26/24	MRL	Email correspondence with M. Roberts regarding drafting the motion for partial judgment for settlement.	0.20	\$114.00
03/26/24	RTST	Work on preparing documents for production to the insurers.	3.40	\$2,516.00
03/27/24	AMUE	Respond to email communication with T. Brown regarding insurer motions and declarations submitted to Court.	0.50	\$462.50
03/27/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	0.60	\$378.00
03/27/24	KAFA	Prepare proofs of claim for production.	0.20	\$79.00
03/27/24	MCM	Attention to issues regarding redaction of amended claims filed post-bar date in preparation for production of same to insurer parties.	0.60	\$495.00
03/27/24	RTST	Work on preparing documents for production to the insurers.	0.40	\$296.00
03/28/24	AMUE	Email communication with counsel for Committee regarding insurers' pending motions (.3); provide advice to M. Lee regarding Debtor's position regarding pending motions (.4).	0.70	\$647.50

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03/28/24	ERR	Review status of tender to insurers (and compliance with protective order).	0.30	\$292.50
03/28/24	MCM	Attention to issues regarding production of redacted proofs of claim to insurer parties (.3); email correspondence regarding same (.5).	0.80	\$660.00
03/28/24	RTST	Work on preparing documents for production to the insurers.	0.30	\$222.00
03/29/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.40	\$882.00
03/29/24	MCM	Attention to issues regarding production of redacted proofs of claim to insurer parties.	0.40	\$330.00
03/30/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.40	\$1,512.00
03/31/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	4.50	\$2,835.00
03/31/24	ERR	Review potential grounds for summary judgment regarding applicability of Clergy III settlement.	0.50	\$487.50
Task Total:			152.90	\$100,163.50

032 Rule 2004 Motions/Discovery/Subpoenas

03/04/24	EPK	Email correspondence with C. Moore of A&M regarding documents to be produced to the Committee relating to the Bishop's Ministries Appeal.	0.10	\$80.00
03/04/24	KAFA	Preparation of documents for production to the Committee (3.3); attend cash substantiation call with P. Bongiovanni, L. Oberempt, D. Flanagan and A&M (.5).	3.80	\$1,501.00
03/04/24	MDL	Evaluate recent document requests from BRG.	0.20	\$160.00
03/04/24	MDL	Email exchange with K. Farrar and R. Stewart regarding review of documents collected for Committee's recent document requests.	0.30	\$240.00
03/04/24	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) regarding Committee diligence requests for cemeteries information.	0.30	\$240.00

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03/05/24	EPK	Coordinate with M. Lee regarding documents to be produced to the Committee relating to the Bishop's Ministries Appeal.	0.10	\$80.00
03/05/24	KAFA	Preparation of documents for production to the Committee.	1.40	\$553.00
03/05/24	MDL	Provide instruction to M. Roberts regarding summary of discovery motions filed by insurers.	0.20	\$160.00
03/05/24	MDL	Email exchange with C. Restel (Lowenstein) regarding insurers' filing of motion to quash in New Jersey bankruptcy court.	0.10	\$80.00
03/05/24	MDL	Analyze summary of insurers' motions to quash and for protective order.	0.10	\$80.00
03/05/24	MR	Review insurers' motions to quash Committee Rule 2004 subpoenas and draft summaries of same.	1.80	\$1,242.00
03/06/24	JSH	Review documents for production.	0.40	\$280.00
03/06/24	KAFA	Attend Committee diligence call with P. Bongiovanni, D. Flanagan and A&M.	0.50	\$197.50
03/06/24	MDL	Email exchange with C. Restel (Lowenstein) regarding insurers' motions for protective order and to quash subpoena.	0.10	\$80.00
03/06/24	MDL	Telephone conference with M. Kemner regarding documents related to Livermore property and presentation to priests regarding plan process.	0.80	\$640.00
03/06/24	MDL	Analyze documents relating to Livermore property.	0.40	\$320.00
03/06/24	MDL	Review status of recent document collections and reviews to prepare for weekly diligence call.	0.10	\$80.00
03/07/24	EPK	Follow up on review, tagging, and production of documents relating to the Bishop's Ministries Appeal.	0.20	\$160.00
03/07/24	JSH	Review documents for production.	0.50	\$350.00
03/07/24	KAFA	Preparation of documents for production to the Committee.	0.80	\$316.00
03/07/24	MDL	Telephone conference with K. Farrar regarding production of recently reviewed documents to Committee.	0.20	\$160.00

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03/07/24	MDL	Analyze production documents relating to Bishop's Ministries Appeal for confidentiality designation.	0.30	\$240.00
03/07/24	MDL	Telephone conference with Lowenstein (M. Kaplan, C. Restel) regarding insurers' discovery motions and the procedure and schedule around same.	0.50	\$400.00
03/07/24	MDL	Email exchange with J. Harper regarding instructions for review of recently collected financial documents in advance of production to Committee.	0.10	\$80.00
03/08/24	KAFA	Preparation of documents for production to the Committee.	1.30	\$513.50
03/08/24	MDL	Telephone conference with counsel for Committee (M. Kaplan and C. Restel) and for Westport Insurance (T. Jacobs, B. Curet) regarding meet and confer on reserve issue.	0.50	\$400.00
03/08/24	MDL	Strategize regarding case law support for position on reserve documentation being discoverable.	0.10	\$80.00
03/08/24	MDL	Telephone conference with M. Kaplan regarding schedule for briefing insurers' discovery motions and Westport position on reserve documentation.	0.20	\$160.00
03/11/24	MDL	Draft email to RCBO leadership summarizing recent discovery motions filed by insurers and procedural status of each.	0.60	\$480.00
03/12/24	KAFA	Preparation of documents for production to the Committee.	0.50	\$197.50
03/13/24	EPK	Email correspondence with D. Cassidy of Alston & Bird regarding CTN document production (.2); confer with A. Uetz and M. Lee regarding same (.1); review CTN-related documents produced by Alston & Bird (.2).	0.50	\$400.00
03/13/24	KAFA	Preparation of documents for production to the Committee.	0.50	\$197.50
03/14/24	KAFA	Review new client documents from Box and prepare for production to Committee.	0.30	\$118.50

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03/14/24	MDL	Email correspondence with R. Manns regarding additional non-debtor Catholic entities from whom Committee has requested or may request discovery.	0.30	\$240.00
03/14/24	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) regarding discovery sought by Committee against non-debtor Catholic entities.	0.30	\$240.00
03/20/24	AMUE	Review request for certain documents to analyze production obligations.	0.90	\$832.50
03/20/24	EPK	Address issues relating to the scope of documents to be produced as to real estate assets.	0.30	\$240.00
03/20/24	KAFA	Analysis of remaining client documents for production to the Committee (1.4); preparation of documents requested by the Committee (.6).	2.00	\$790.00
03/20/24	MDL	Email exchange with A. Uetz regarding information produced to Committee regarding Livermore property.	0.30	\$240.00
03/20/24	MDL	Email correspondence with R. Manns (Norton Rose Fulbright) regarding nature of Non-Debtor Catholic Entities from whom Committee may seek discovery.	0.20	\$160.00
03/21/24	KAFA	Prepare documents for production to the Committee.	0.50	\$197.50
03/21/24	RTST	Work on preparing documents for production to the insurers.	1.30	\$962.00
03/22/24	SJM	Email to case team regarding local procedure for evidentiary motions and witness testimony, in light of communications between Committee and insurers.	0.70	\$525.00
03/26/24	EPK	Review email correspondence with M. Kaplan of Lowenstein regarding discovery dispute with insurance carriers.	0.20	\$160.00
03/26/24	MDL	Evaluate dispute over production of reserve information and Debtor's position on same.	0.50	\$400.00
03/26/24	MDL	Email exchange with C. Restel and M. Kaplan (each of Lowenstein) regarding discoverability of reserve information.	0.40	\$320.00

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03/26/24	MR	Perform research regarding discoverability of insurers' reserve information, in connection with multiple motions filed by insurers regarding Committee's Rule 2004 document requests.	0.90	\$621.00
03/27/24	EPK	Review correspondence with counsel to Westport regarding discovery dispute and evidentiary issues relating to same (.2); review email correspondence from P. Bongiovanni and L. Oberempt regarding third-party subpoena issued to financial institution (.2).	0.40	\$320.00
03/27/24	KAFA	Prepare documents for production to the Committee.	0.40	\$158.00
03/27/24	MR	Evaluate potential responses to insurers' motions to quash Rule 2004 document requests from Committee.	0.20	\$138.00
03/28/24	KAFA	Analysis of additional diligence items received from client and A&M.	0.50	\$197.50
03/29/24	MCM	Follow-up work on potential production to Committee of back-up analysis on claims and claim objections.	0.50	\$412.50
		Task Total:	28.60	\$17,420.50

038 Mediation

03/01/24	AMUE	Meeting with Judge Sontchi and M. Moore regarding claim analysis (.8); debrief with M. Moore (.3).	1.10	\$1,017.50
03/01/24	JRBL	Review work product in preparation for mediation offer.	2.30	\$2,932.50
03/01/24	MCM	Prepare for (.7) and participate in conference call with Judge Sontchi regarding mediation preparation and related issues (.8); email correspondence with same based on information requests (.3).	1.80	\$1,485.00
03/01/24	MRL	Review pending dioceses cases to provide an update on their status to the Foley team and the client.	0.70	\$399.00
03/02/24	AMUE	Outline presentation for first mediation session.	1.40	\$1,295.00

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03/02/24	JRBL	Review DRC summary and discussion in preparation for mediation.	0.20	\$255.00
03/02/24	JRBL	Review work product data and compilations in preparation of mediation strategy.	3.30	\$4,207.50
03/02/24	MCM	Work on materials in response to inquiry from mediator regarding other diocesan cases.	0.50	\$412.50
03/03/24	JRBL	Analysis of non-monetary offerings in preparation for mediation.	2.20	\$2,805.00
03/03/24	JRBL	Analysis of tort claims for mediation.	1.30	\$1,657.50
03/04/24	AMUE	Draft presentation for SteerCo meeting to prepare for mediation.	1.10	\$1,017.50
03/04/24	AMUE	Revisions to deck for mediation regarding restricted assets.	0.70	\$647.50
03/04/24	EPK	Email correspondence with C. Wiltgen of A&M regarding mediation documents protocol.	0.10	\$80.00
03/04/24	JRBL	Review press coverage of abuse cases in preparation for mediation and client meetings.	0.70	\$892.50
03/04/24	SJM	Prepare confidential header language for mediation documents.	0.30	\$225.00
03/04/24	TND	Review request from A&M on mediation confidentiality information to include in documents.	0.10	\$73.50
03/05/24	AMUE	Emails with Judge Sontchi regarding mediation.	0.40	\$370.00
03/05/24	AMUE	Prepare for mediation by review of privileged client materials highlighting information needed for mediation.	4.50	\$4,162.50
03/05/24	AMUE	Attend SteerCo meeting in preparation for mediation.	1.50	\$1,387.50
03/05/24	EPK	Email correspondence with the A&M team regarding mediation-related documents protocol.	0.10	\$80.00
03/05/24	ERR	Prepare for (.5) and attend Steering Committee meeting regarding case status and strategy regarding insurance (1.5).	2.00	\$1,950.00
03/05/24	JCH	Provide information re: Committee members to Foley group.	0.50	\$150.00

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03/05/24	JRBL	Communication with A. Uetz regarding revision to mediation plan.	0.20	\$255.00
03/05/24	JRBL	Review spreadsheets and attorney work product in preparation for client SteerCo meeting.	3.10	\$3,952.50
03/05/24	JRBL	Communication with A. Uetz in preparation for SteerCo meeting.	0.20	\$255.00
03/05/24	MDL	Evaluate privilege applicable to documents created for mediation preparation and presentation.	0.10	\$80.00
03/05/24	TND	Prepare language for confidentiality legend for mediation documents.	0.20	\$147.00
03/06/24	AMUE	Review deck regarding restricted assets in preparation for meeting with Judge Sontchi.	0.90	\$832.50
03/06/24	AMUE	Draft memorandum to M. Kemner regarding mediation and SteerCo strategy.	1.10	\$1,017.50
03/06/24	MRL	Review pending dioceses cases to provide an update on their status to the Foley team and the client.	0.80	\$456.00
03/07/24	AAAM	Research requested arbitrator.	0.30	\$72.00
03/07/24	AMUE	Meeting with C. Moore, C. Sontchi and M. Lee regarding Debtor's assets (1.0); prepare for meeting (1.2).	2.20	\$2,035.00
03/07/24	MCM	Attention to issues regarding claims analysis requested by mediator in preparation for meetings scheduled for March 18 and 19 in San Francisco.	1.00	\$825.00
03/07/24	MCM	Email correspondence with Foley team regarding feedback from mediator on asset valuation analysis and related issues.	0.30	\$247.50
03/07/24	MDL	Telephone conference with C. Moore (A&M) and Judge C. Sontchi regarding estate asset information.	0.70	\$560.00
03/07/24	MDL	Telephone conference with C. Moore (A&M) regarding question from Judge C. Sontchi about non-estate assets.	0.10	\$80.00
03/07/24	MDL	Analyze presentation on estate assets in preparation for meeting with Judge C. Sontchi.	0.10	\$80.00

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03/07/24	MDL	Analyze revised claims analysis presentation for use in mediation.	0.20	\$160.00
03/07/24	MDL	Email correspondence with Judge C. Sontchi regarding estate asset information.	0.10	\$80.00
03/08/24	MRL	Finalize review of pending dioceses cases to provide an update on their status to the Foley team and the client.	0.60	\$342.00
03/10/24	MDL	Draft plan term sheet in advance of joint mediation session.	2.10	\$1,680.00
03/11/24	AMUE	Obtain feedback from Judge Sontchi regarding asset discussion (.3) and communication with client leadership and C. Moore regarding next steps (.5).	0.80	\$740.00
03/11/24	AMUE	Review communication received from J. Krivis (.2) and communication with client regarding same (.2).	0.40	\$370.00
03/11/24	EPK	Email correspondence with A. Uetz regarding substantiation of restricted assets for purposes of mediation (.2); emails with C. Moore of A&M regarding same (.2); review restricted asset analysis tracker and litigation claims tracker to gather information for mediation (.4); review prior case law research on tracing of funds and assets held in trust (.2).	1.00	\$800.00
03/11/24	MCM	Attention to asset valuation issues in preparation for mediation meetings scheduled for March 18 and 19 in San Francisco.	0.40	\$330.00
03/11/24	MDL	Telephone conference with A. Uetz regarding assets available for settlement and initial mediation strategy.	1.00	\$800.00
03/11/24	MDL	Continue to draft plan term sheet in advance of joint mediation session.	0.30	\$240.00
03/12/24	AMUE	Work on strategy for first joint mediation session, including review of other case outcomes.	2.20	\$2,035.00
03/12/24	AMUE	Revisions to draft privileged presentation regarding RCBO corporate structure and assets for purposes of mediation.	1.10	\$1,017.50
03/12/24	AMUE	Draft strategy update for client leadership team following meeting with Judge Sontchi.	0.80	\$740.00

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03/12/24	EPK	Call with A. Uetz regarding information relating to debtor/non-debtor asset holdings and related legal arguments to be prepared for mediation proceedings next week (.4); conference call with the A&M team to discuss non-debtor entity asset holdings (.9); follow-up email correspondence with the A&M team regarding asset descriptions for mediation (.2); email correspondence with A. Uetz and M. Lee regarding presentation slides for the mediator on asset holdings and restricted cash analysis (.2); confer with J. Harper regarding bankruptcy case law relating to resulting trust arguments, including review of summary prepared by J. Harper (.5); analyze property of the estate issues and supporting legal arguments for mediation process (.6); request legal research from M. Rofaeil regarding property of the estate under Section 541 (.2).	3.00	\$2,400.00
03/12/24	JSH	Analyze Wilmington decision and related issues for E. Khatchaturian ahead of mediation.	0.60	\$420.00
03/12/24	KAFA	Analysis of Camden Plan of Reorganization in preparation for mediation.	0.50	\$197.50
03/12/24	MDL	Telephone conference with A. Uetz regarding preparation for asset presentation to Committee at mediation.	0.20	\$160.00
03/12/24	MRL	Confer with E. Khatchaturian regarding the issue of restricted donations (.3); research case law under sections 541(d) and (f) on whether restricted donations are property of the estate in aiding mediation talks (1.0).	1.30	\$741.00
03/13/24	AMUE	Prepare for meeting with Judge Newsome and T. Gallagher (.7); initial meeting with Judge Newsome and T. Gallagher (.5).	1.20	\$1,110.00
03/13/24	EPK	Develop arguments to support restricted assets and related property of the estate issues (1.3); email correspondence with J. Kohout regarding analysis of exemplary donative intent documents (.2); follow up with M. Rofaeil regarding property of the estate research (.2); preliminary review of mediation presentation slides on non-debtor assets prepared by the A&M team (.2).	1.90	\$1,520.00

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03/13/24	MCM	Attention to asset valuation issues in preparation for mediation meetings scheduled for March 18 and 19 in San Francisco.	0.40	\$330.00
03/13/24	MDL	Telephone conference with A. Uetz regarding deliverables to insurance mediators and strategies for mediation of insurance issues.	0.20	\$160.00
03/13/24	MDL	Telephone conference with A. Uetz (Foley) and the two insurance mediators (T. Gallagher, R. Newsome) regarding issues in adversary proceeding and potential bases for resolution with insurers.	0.70	\$560.00
03/13/24	MRL	Research case law under sections 541(d) and (f) on whether restricted donations are property of the estate in aiding mediation talks (5.7); email correspondence with E. Khatchatourian regarding the case law for the research (.3).	6.00	\$3,420.00
03/14/24	AMUE	Prepare for mediation by review of a privileged issue and Debtor's position regarding same.	3.20	\$2,960.00
03/14/24	EPK	Follow up with A. Uetz and M. Lee regarding asset analysis presentation slides for mediation process (.2); review property of the estate research summary prepared by M. Rofaail (.3); coordinate with M. Rofaail regarding mediation slides summarizing property of the estate arguments and development of supporting arguments (.6); follow up with J. Kohout regarding state law analysis in support of property subject to donative restrictions, including review of slides discussing charitable donations law (.3); work on editing, refining, and updating mediation presentation slides on non-Debtor Catholic Entity assets and funds held in trust for others (1.2).	2.60	\$2,080.00
03/14/24	JCH	Email correspondence with A. Uetz regarding parties listed on mediation attendee list.	0.20	\$60.00

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03/14/24	MRL	Finalize research for case law under sections 541(d) and (f) on whether restricted donations are property of the estate in aiding mediation talks (2.7); create a PowerPoint of the research regarding property of the estate with the application of the facts in preparation for the presentation to the mediator (2.6); email correspondence with E. Khatchatourian regarding the research for the PowerPoint (.3).	5.60	\$3,192.00
03/15/24	AMUE	Prepare for upcoming mediation sessions on 3/18 and 3/19.	3.00	\$2,775.00
03/15/24	DMH	Attend strategy call with E. Ridley to strategize approach for preparing claims valuation ahead of mediation.	1.00	\$475.00
03/15/24	DMH	Analyze each RCBO claim for alleged occurrences, policy limits, and perpetrator information to prepare client update ahead of mediation.	7.90	\$3,752.50
03/15/24	EPK	Call with S. Levitt of A&M to discuss mediation presentation slides and preliminary comments to same (.3); post-call email correspondence with S. Levitt regarding financial data for certain slides (.2).	0.50	\$400.00
03/15/24	EPK	Extensive work on the mediation presentation slides on non-debtor assets and related legal arguments (3.4); email correspondence with Foley and A&M teams regarding same (.2); confer with J. Kohout regarding restricted cash analysis for the presentation slides (.1).	3.70	\$2,960.00
03/15/24	JCH	Revise contact list regarding insurance mediation.	0.50	\$150.00
03/15/24	JJK	Review restriction information for presentation.	0.80	\$700.00
03/15/24	MCM	Email correspondence with Foley team regarding slide decks for presentation to mediator and revisions to same (.3); analyze issues in connection with valuation of insurance assignment in Camden case or lack thereof (.5); prepare for mediation scheduled for March 18 and 19 in San Francisco (.4).	1.20	\$990.00

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03/15/24	MRL	Review pending dioceses cases to provide an update on their status to the Foley team and the client.	1.00	\$570.00
03/15/24	MRL	Email correspondence with E. Khatchatourian regarding the research for the PowerPoint.	0.20	\$114.00
03/16/24	AMUE	Prepare talking points for mediation (.9); work on term sheet for mediation (.6).	1.50	\$1,387.50
03/16/24	EPK	Email correspondence with the Foley and A&M teams regarding comments to the mediation presentation slides (.4); revise presentation slides to incorporate additional factual background, analysis, and data points (2.8).	3.20	\$2,560.00
03/17/24	AMUE	Review term sheet summary prepared by S. Moses (.4); email client leadership team regarding mediation term sheet (.5).	0.90	\$832.50
03/17/24	AMUE	Revise opening talking points for M. Kemner for mediation (.9); three email communications with M. Kemner regarding documents to provide to Judge Sontchi at mediation (.5); outline presentation regarding restricted assets for mediation (1.0).	2.40	\$2,220.00
03/17/24	EPK	Email correspondence with A. Uetz and C. Moore regarding revisions to the mediation presentation slides on property of the estate issues (.4); review revised and proposed final mediation presentation slides (.2).	0.60	\$480.00
03/17/24	MDL	Evaluate Committee's initial term sheet.	0.30	\$240.00
03/17/24	MDL	Revise outline of presentation to Judge Sontchi for March 18 mediation session.	1.60	\$1,280.00
03/17/24	MDL	Evaluate insurance-neutral terms in other mass tort plans of reorganization.	1.60	\$1,280.00
03/17/24	SJM	Draft summary of Committee term sheet.	1.50	\$1,125.00
03/18/24	AMUE	Prepare for mediation (1.5); attend mediation session with Judge Sontchi, client and Committee professionals (8.0).	9.50	\$8,787.50

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03/18/24	EPK	Review documents and analyses to prepare the Foley team for mediation-related inquiries concerning restricted assets and the Oakland Parochial Fund (.8); organize mediation arguments (.3).	1.10	\$880.00
03/18/24	MCM	Attend mediation meetings in San Francisco with Committee and Foley teams and client parties.	8.00	\$6,600.00
03/18/24	MDL	Appear for the Debtor in first day of two-day mediation session with Judge Christopher Sontchi.	7.80	\$6,240.00
03/18/24	MDL	Prepare for first day of two-day mediation session with Judge Christopher Sontchi.	0.60	\$480.00
03/18/24	MRL	Email correspondence with E. Khatchaturian regarding preparing notes on section 541(f) (.3); draft document of notes on section 541(f) in aiding mediation (.7).	1.00	\$570.00
03/19/24	AMUE	Attend mediation session with Committee (6.5); debrief with client leadership team (1.0).	7.50	\$6,937.50
03/19/24	JCH	Revise contact list regarding insurance mediation and email same to A. Uetz.	0.50	\$150.00
03/19/24	MCM	Attend mediation in San Francisco with Committee and client parties (partial).	4.00	\$3,300.00
03/19/24	MDL	Prepare for mediation session (2.2) Appear for Debtor at second day of two-day mediation (6.5).	8.70	\$6,960.00
03/20/24	AMUE	Review email received from Judge Sontchi (.3) and respond to same in follow up to mediation session (.3); review additional email received from Judge Sontchi (.2); review information regarding property issues (.5).	1.30	\$1,202.50
03/20/24	AMUE	Analyze other case outcomes in diocese cases.	1.10	\$1,017.50
03/20/24	EPK	Review supplemental property of the estate analysis prepared by M. Rofaail in connection with the mediation process.	0.20	\$160.00
03/21/24	AMUE	Review analysis regarding other case outcomes for purposes of mediation (.8); draft privileged email regarding same (.6).	1.40	\$1,295.00

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Foley & Lardner LLP

April 30, 2024

03/21/24	AMUE	Multiple (4+) email communications with Bishop Barber and client team regarding mediation (.8); telephone conference with B. Weisenberg regarding mediation (.2).	1.00	\$925.00
03/21/24	MCM	Attention to post-mediation requests for information on other diocesan bankruptcy cases from mediator.	1.50	\$1,237.50
03/21/24	MRL	Review pending dioceses cases to provide an update on their status to the Foley team and the client.	0.60	\$342.00
03/22/24	AMUE	Email communication with B. Weisenberg (.2) and with J. Prol (.1) regarding mediation.	0.30	\$277.50
03/22/24	MCM	Attention to post-mediation requests for information on other diocesan bankruptcy cases from mediator (.8); email memorandum to Foley team regarding same (.5).	1.30	\$1,072.50
03/22/24	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to the Foley team and the client.	0.70	\$399.00
03/25/24	AMUE	Meeting with Judge Sontchi and counsel for the Committee regarding mediation.	0.40	\$370.00
03/25/24	AMUE	Multiple (3+) email communications with client leadership team regarding mediation.	0.70	\$647.50
03/25/24	MCM	Attention to preparation for continued mediation.	0.40	\$330.00
03/26/24	AMUE	Telephone meeting with M. Kemner regarding mediation strategy (.7); work on review of certain claims information to inform mediation strategy (.9); outline recommendation to client leadership regarding mediation strategy (1.1); review information regarding certain real estate assets to inform mediation strategy (1.1).	3.80	\$3,515.00
03/26/24	MCM	Review draft email correspondence with client parties regarding continuation of discussions with Committee and potential counter offer (.3); telephone conference with A. Uetz regarding same (.4); attention to issues concerning counter settlement offer to Committee (.3).	1.00	\$825.00
03/26/24	MDL	Evaluate terms of Debtor's counter-proposal to Committee.	0.20	\$160.00

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03/27/24	AMUE	Email communication with Judge Sontchi (.3); communications with M. Kemner regarding internal deliverables for next mediation (.6); develop strategy regarding next proposal (1.1).	2.00	\$1,850.00
03/27/24	MCM	Prepare for continued mediation in April in San Francisco.	0.50	\$412.50
03/28/24	AMUE	Communication to client leadership team regarding mediation (.5) and communication with Foley team regarding mediation strategy (.3).	0.80	\$740.00
03/28/24	AMUE	Communication with M. Kemner regarding privileged mediation issue (.8); draft communication to client leadership team regarding confidential mediation issue (1.1); communication with Judge Sontchi regarding mediation (.4).	2.30	\$2,127.50
03/28/24	EPK	Confer with A. Uetz regarding comprehensive analysis of corporate structure of the legal entities within the Diocese of Oakland for purposes of mediation process.	0.20	\$160.00
03/28/24	MCM	Conference call with A. Uetz regarding counter-offer to Committee for mediation and related issues (.4); review email correspondence regarding same (.2); attention to potential production to Committee of back-up analysis on claims and claim objections (.4).	1.00	\$825.00
03/28/24	MRL	Review pending dioceses cases to provide an update on their status to client.	0.30	\$171.00
03/28/24	MRL	Research whether a bankruptcy filing tolls a statute of limitation in regards to the claims that did not file a state court complaint.	3.70	\$2,109.00
03/28/24	TFCA	Review updated counter-offer email.	0.20	\$265.00
03/29/24	AMUE	Communication with Judge Sontchi regarding mediation.	0.40	\$370.00
03/29/24	EPK	Begin to distill prior corporate structure analyses into summary form for mediation process.	0.30	\$240.00
03/29/24	MRL	Review pending dioceses cases to provide an update on their status to client.	0.50	\$285.00

03/30/24 MRL Finalize review of pending dioceses cases to provide an update on their status to the Foley team. 0.80 \$456.00

Task Total: 187.70 \$156,026.00

Services Total: 561.30 \$410,027.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Dania Abbasi	DAAB	Associate	42.80	\$630.00	\$26,964.00
Emmaline S. Jurgena	ESJ	Associate	6.50	\$630.00	\$4,095.00
Jose A. Lazaro	JAL	Associate	2.30	\$600.00	\$1,380.00
Joseph S. Harper	JSH	Associate	14.60	\$700.00	\$10,220.00
Kirsten R. Dedrickson	KRD	Associate	5.80	\$685.00	\$3,973.00
Mason Roberts	MR	Associate	3.50	\$690.00	\$2,415.00
Mary Rofaeil	MRL	Associate	34.40	\$570.00	\$19,608.00
Mikaela R. Mitcham	MRM	Associate	1.00	\$570.00	\$570.00
Stephanie McPhail	SMP	Associate	1.40	\$630.00	\$882.00
Shane J. Moses	SJM	Of Counsel	32.40	\$750.00	\$24,300.00
Angela A. Henes	AAAM	Other	0.30	\$240.00	\$72.00
Janelle C. Harrison	JCH	Paralegal	32.80	\$300.00	\$9,840.00
Kerry A. Farrar	KAFA	Paralegal	18.10	\$395.00	\$7,149.50
Adam J. Hepworth	AJHE	Partner	0.20	\$775.00	\$155.00
Ann Marie Uetz	AMUE	Partner	97.60	\$925.00	\$90,280.00
Emil P. Khatchatourian	EPK	Partner	42.60	\$800.00	\$34,080.00
Eileen R. Ridley	ERR	Partner	20.50	\$975.00	\$19,987.50
Jason J. Kohout	JJK	Partner	2.90	\$875.00	\$2,537.50
Jonathan P. Witt	JPWI	Partner	1.70	\$800.00	\$1,360.00
Jeffrey R. Blease	JRBL	Partner	17.50	\$1,275.00	\$22,312.50
Mark C. Moore	MCM	Partner	51.30	\$825.00	\$42,322.50
Matthew D. Lee	MDL	Partner	46.50	\$800.00	\$37,200.00
Thomas F. Carlucci	TFCA	Partner	1.40	\$1,325.00	\$1,855.00
Matthew S. Kiel	MSK	Senior Counsel	2.60	\$775.00	\$2,015.00
Robert T. Stewart	RTST	Senior Counsel	7.00	\$740.00	\$5,180.00
Daniyal M. Habib	DMH	Special Counsel	54.30	\$475.00	\$25,792.50
Tamar N. Dolcourt	TND	Special Counsel	17.10	\$735.00	\$12,568.50

Kevin T. Lewman	KTLE	Technical Specialist	2.20	\$415.00	\$913.00
Totals			561.30		\$410,027.50

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$1,722.30
LSS - eDiscovery Services	\$3,600.00
Other Fees	\$3.05
Recording / Filing Fees	\$90.30
Expenses Incurred Total	\$5,415.65

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

Expense Detail

Electronic Legal Research Services

Date	Initials	Description	Amount
03/31/24	MCM	Docket Report. US RESTATEMENTS DOC ACCESS. US TREATISES DOC ACCESS. Search. US JURISPRUDENCE DOC ACCESS. US LAW REVIEWS AND JOURNALS DOC ACCESS. SEARCH ACCESS CHARGE. Westlaw. US MOTIONS DOC ACCESS.	\$1,722.30

LSS - eDiscovery Services

Date	Initials	Description	Amount
03/31/24	JRBL	LSS - eDiscovery Services.	\$3,600.00

Other Fees

Date	Initials	Description	Amount
03/31/24	25241	Certificate of Good Standing--VENDOR: U.S. BANK 03/04/24 Wisconsin Certificate of Good Standing (100845-0402) (M. Lee) -.	\$3.05

Recording / Filing Fees

Date	Initials	Description	Amount
02/23/24	JRBL	ACE ATTORNEY SERVICE, INC. - Filing - 02/23/24.	\$90.30

Expense Total: \$5,415.65

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

Date: May 30, 2024
Invoice No.: 50846539
Our Ref. No.: 100845-0402

Services through April 30, 2024

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	\$444,798.00
Total Expenses:	\$9,234.61
Amount Due:	\$454,032.61

Professional Services Detail

003 Automatic Stay

04/23/24	EPK	Email correspondence with M. Gately of DLA Piper regarding scope of stay issues (.4); call with M. Gately regarding non-debtor stay issues (.3); develop strategy with the Foley team regarding non-debtor stay issues (1.1); review email correspondence with R. Simons regarding administrative consolidation of state court cases into the JCCP (.1); analysis of actions where non-debtor institutional defendants were named with RCBO as co-defendants (.5); confer with S. Moses regarding positions to be clarified at the CMC regarding stay issues (.6); email coordination with Liaison Counsel for the Institutional Defendants in the JCCP 5108 (.2).	3.20	\$2,560.00
04/23/24	SJM	Call with E. Khatchatourian regarding stay issues and state court actions with non-debtor co-defendants.	0.30	\$225.00
04/23/24	SJM	Emails with E. Khatchatourian and A. Ouellette regarding request from religious order co-defendant regarding stay.	0.40	\$300.00
04/24/24	EPK	Emails with A. Rosaluk of DLA Piper regarding co-defendant stay issues (.2); call with A. Rosaluk to further discuss same (.5).	0.70	\$560.00
04/29/24	EPK	Email correspondence with A. Uetz regarding strategy relating to potential stay clarification/relief to be sought by abuse Plaintiffs.	0.20	\$160.00
Task Total:			4.80	\$3,805.00

004 Bankruptcy Litigation/Adversary Proceedings

04/02/24	EPK	Coordinate with M. Lee and J. Harper regarding transmission of turnover demand letter to counsel for the Bennett Trust trustee.	0.10	\$80.00
04/03/24	EPK	Coordinate with M. Lee and J. Harper regarding timing and next steps for transmittal of Bennett Trust turnover demand letter.	0.10	\$80.00
04/04/24	EPK	Email correspondence with M. Lee regarding Bennett Trust turnover issues (.2); review petition for redress of damages (.1).	0.30	\$240.00
04/04/24	MDL	Evaluate different components of claim against Bennett Trust.	0.10	\$80.00
04/09/24	EPK	Email correspondence with R. Lund of Plageman firm regarding transmission of turnover demand letter to Bennett Trust trustee's counsel (.2); related email correspondence with A. Bardos (.2).	0.40	\$320.00
04/09/24	MDL	Email correspondence with M. Zatkin regarding turnover demand.	0.10	\$80.00
04/09/24	MDL	Email exchange with Plageman Lund regarding turnover demand.	0.20	\$160.00
04/26/24	EPK	Email correspondence with R. Lund and B. Wilson of the Plageman firm regarding follow-up on the turnover demand letter sent to the Bennett Trust trustee (.2); review supplemental letter transmitted to the Attorney Zatkin for the Bennett Trust trustee (.1).	0.30	\$240.00
		Task Total:	1.60	\$1,280.00

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

04/03/24	MCM	Email correspondence with counsel for Committee regarding late-filed claim issues.	0.30	\$247.50
04/04/24	MRL	Email correspondence with M. Lee and M. Moore regarding the amount of claims (.2); search documents regarding the same (.2).	0.40	\$228.00
04/08/24	EPK	Conference with M. Moore and M. Rofaeil regarding abuse claims analysis and strategy relating to same.	0.60	\$480.00

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04/08/24	MRL	Confer with E. Khatchatourian and M. Moore regarding the status of the proofs of claim and possible objections.	0.60	\$342.00
04/09/24	MCM	Conference call with J. Blease regarding claims information in response to client inquiries.	0.30	\$247.50
04/09/24	MRL	Revise outline of M. Moore's presentation to the Foley team regarding status of the claims.	1.60	\$912.00
04/10/24	MCM	Attention to issues concerning claims with no filed state-court complaints in advance of mediation.	0.60	\$495.00
04/10/24	MCM	Work on draft memoranda regarding issues concerning claims with no state-court complaint.	0.50	\$412.50
04/10/24	MDL	Telephone conference with M. Moore regarding specific claims for claimants who did not file complaints in state court by 12/31/22.	0.40	\$320.00
04/10/24	MRL	Revise the PowerPoint of M. Moore's presentation to the Foley team regarding status of the claims.	0.40	\$228.00
04/11/24	MCM	Work on draft memoranda regarding issues concerning claims with no state-court complaint.	0.40	\$330.00
04/16/24	MCM	Email correspondence with claims-review experts regarding issues raised by Committee with respect to claims analysis.	0.40	\$330.00
04/17/24	MCM	Email correspondence with claims-review experts regarding further claims analysis and related issues (.3); memo to file regarding claims analysis from Committee perspective (.4).	0.70	\$577.50
04/18/24	AMUE	Review status of request by claimant to allow late-filed claim (.3) and provide advice regarding same (.3).	0.60	\$555.00
04/18/24	AMUE	Review information on late-filed claims to provide client advice regarding same.	0.50	\$462.50

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04/18/24	MCM	Analyze claims following feedback from Committee to claims funnel and results of prior review (.9); conference call with claims-review experts regarding claims designated for additional review (.3); review email correspondence from Committee requesting additional information on claims against and reconcile against client records and other information in preparation for response (1.0).	2.20	\$1,815.00
04/19/24	MCM	Analyze claims funnel and results of prior review (.8); confer with counsel for late-filed claimant regarding motion to allow same as timely (.3).	1.10	\$907.50
04/20/24	MRL	Draft memorandum on state court complaints for claims and potential related arguments for client.	0.50	\$285.00
04/21/24	MRL	Continue drafting memorandum on state court complaints for claims and potential arguments for the client.	0.80	\$456.00
04/22/24	AMUE	Review issue related to late-filed claim to provide advice to client regarding same.	0.40	\$370.00
04/22/24	KAFA	Conference call with M. Moore regarding claims analysis and information requests from Committee counsel (.5); research and pull information regarding no-responsibility claims (1.0); email correspondence transmitting results of searches into background information (.4).	1.90	\$750.50
04/22/24	MCM	Conference call with K. Farrar regarding information requests from Committee (.5); review information provided by same in context of settled or paid claims (.5); review claims identified by Committee (1.5); memo to file regarding additional reconciliation (.5); revise claims-review matrix to incorporate additional information (.7); email correspondence regarding late-filed claim and potential motion to allow same (.3).	4.00	\$3,300.00
04/22/24	MDL	Telephone conference with M. Moore regarding claims for which Committee requested additional information.	0.30	\$240.00
04/22/24	MRL	Finalize memorandum on state court complaints for potential claims against insurers for client.	1.00	\$570.00
04/23/24	KAFA	Research information regarding no-responsibility claims.	0.30	\$118.50

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04/23/24	MCM	Continue working on updated claims-review matrix and funnel in response to Committee requests for additional information (2.0); email correspondence with A. Uetz and M. Lee regarding request in Franciscan Friars case for publication to RCBO creditors of bar-date order (.3).	2.30	\$1,897.50
04/24/24	KAFA	Research information regarding claims.	0.30	\$118.50
04/24/24	MCM	Email correspondence with A&M claims-review experts regarding additional analysis of specified claims (.3); review updated analysis in connection with same (.5); follow-up correspondence with claims review team (.3); incorporate same into claims-review matrix (.5); continue revisions to claims funnel in preparation for publication to other parties (.7).	2.30	\$1,897.50
04/25/24	MCM	Follow-up email correspondence with claims-review experts regarding claims tiering (.3); continue revisions to claims funnel (.4).	0.70	\$577.50
04/25/24	MCM	Analyze claims against parties for whom diocese does not bear legal responsibility and reconcile information against client documentation.	1.50	\$1,237.50
04/26/24	MCM	Continue working on analysis of claims against parties for whom diocese does not bear legal responsibility and reconcile information against client documentation.	0.80	\$660.00
04/28/24	MCM	Strategize regarding analysis of claims against parties for whom diocese does not bear legal responsibility.	0.50	\$412.50
04/29/24	MCM	Continue working on preparation for claim-by-claim analysis of claims for which the Debtor may not bear legal responsibility.	1.00	\$825.00
04/30/24	MCM	Continue working on preparation for claim-by-claim analysis of claims for which the Debtor may not bear legal responsibility.	1.00	\$825.00
		Task Total:	31.20	\$23,431.00

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

04/01/24	EPK	Review recent updates to the master case calendar and key dates timeline (.3); provide comments to J. Harrison regarding same (.3).	0.60	\$480.00
04/01/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
04/01/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.50	\$350.00
04/01/24	MRL	Summarize docket activity to circulate update to team.	0.20	\$114.00
04/02/24	EPK	Review updated master case calendar and key dates timeline (.1); assess RCBO's compliance with Bankruptcy Code reporting and disclosure requirements (.2).	0.30	\$240.00
04/02/24	JCH	Update daily docket report.	0.50	\$150.00
04/03/24	EPK	Follow up on monitoring non-bankruptcy litigation dates/deadlines and corresponding updates to master case calendar (.2); review updated chapter 11 task list (.1).	0.30	\$240.00
04/03/24	JCH	Update daily docket report (.5); calendar deadlines related to continued hearing on multiple Motions (.5).	1.00	\$300.00
04/03/24	MRL	Review email from A. Uetz regarding RCBO weekly update.	0.10	\$57.00
04/04/24	JCH	Update daily docket report.	0.50	\$150.00
04/05/24	JCH	Update daily docket report.	0.50	\$150.00
04/06/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.40	\$228.00
04/08/24	EPK	Evaluate Bankruptcy Code compliance issues and disclosure obligations (.3); email correspondence with J. Harrison and J. Harper regarding updates to the master case calendar (.2).	0.50	\$400.00
04/08/24	JCH	Revise Master Case Calendar and Timeline.	0.80	\$240.00
04/09/24	EPK	Follow up on status of updated master case calendar and key dates timeline for this week (.2); review new critical case dates and deadlines (.1).	0.30	\$240.00

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04/09/24	JCH	Update daily docket report.	0.50	\$150.00
04/09/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.50	\$350.00
04/09/24	MRL	Summarize docket activity to circulate update to team.	0.20	\$114.00
04/10/24	JCH	Update daily docket report.	0.50	\$150.00
04/11/24	JCH	Update daily docket report (.6); calendar status conference on motions set for hearing on April 26, 2024 (.1).	0.70	\$210.00
04/12/24	JCH	Update daily docket report.	0.70	\$210.00
04/15/24	EPK	Oversee this week's updates to the master case calendar and key dates timeline.	0.20	\$160.00
04/15/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
04/15/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.50	\$350.00
04/15/24	MRL	Review email from J. Harrison with RCBO update.	0.10	\$57.00
04/16/24	JCH	Update daily docket report (.5); calendar extended deadlines and hearing related to Committee's Motion to Enforce Rule 2004 Order (.5).	1.00	\$300.00
04/16/24	JSH	Attention to hearing transcript issues.	0.10	\$70.00
04/16/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.20	\$114.00
04/17/24	JCH	Update daily docket report.	0.50	\$150.00
04/17/24	MRL	Finalize summary of daily docket activity and upcoming deadlines for client.	0.40	\$228.00
04/18/24	JCH	Update daily docket report.	0.50	\$150.00
04/18/24	MRL	Review email from J. Harrison with RCBO docket update.	0.10	\$57.00
04/19/24	JCH	Update daily docket report(.5); calendar deadlines related to District Court cases (.5).	1.00	\$300.00

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04/22/24	EPK	Review new critical case dates and deadlines, including those for district court proceedings (.2); Foley team coordination regarding updates to master calendar and filing of CNOs for unopposed pending motions (.2).	0.40	\$320.00
04/22/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
04/22/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.80	\$560.00
04/22/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.50	\$285.00
04/23/24	EPK	Follow up with the Foley restructuring team regarding notice to the Committee and the U.S. Trustee regarding compliance with monthly reporting requirements, payment of quarterly fees, notification of bank account modifications, and OCP quarterly fees notice.	0.30	\$240.00
04/23/24	JCH	Update daily docket report (.5); calendar hearing and response deadline to Motion to Allow Late Filing of Proof of Claim (.2).	0.70	\$210.00
04/23/24	MRL	Finalize summary of daily docket activity and upcoming deadlines for client (.2); review email from J. Harrison with RCBO docket update (.1).	0.30	\$171.00
04/24/24	JCH	Update daily docket report.	0.50	\$150.00
04/25/24	EPK	Review updated critical case dates and deadlines (.1); follow up on docketing of same (.2).	0.30	\$240.00
04/25/24	JCH	Update daily docket report.	0.50	\$150.00
04/26/24	JCH	Update daily docket report.	0.50	\$150.00
04/29/24	EPK	Oversee modifications to the critical case dates and deadlines reflected in the master case calendar (.2); review finalized master case calendar and key dates timeline (.1).	0.30	\$240.00
04/29/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5); calendar response deadline to Committee professionals' March 2024 monthly fee statements (.2).	1.20	\$360.00
04/29/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.50	\$350.00

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04/29/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.90	\$513.00
04/30/24	EPK	Follow up with the client team regarding payment of U.S. Trustee fees for Q1 2024 and filing of certificate of compliance relating to OCP order.	0.20	\$160.00
04/30/24	JCH	Update daily docket report.	0.50	\$150.00
		Task Total:	25.60	\$11,608.00

007 Chapter 11 Plan/ Plan Confirmation

04/02/24	MCM	Analyze filings in Camden case in connection with stay of confirmation order pending appeal of same (.5); update case files on other diocesan bankruptcy cases (.8).	1.30	\$1,072.50
04/04/24	MCM	Attention to case files regarding other diocesan bankruptcies and updates to same based on recent events.	0.60	\$495.00
04/05/24	MCM	Attention to case files regarding other diocesan bankruptcies and updates to same based on recent events.	0.60	\$495.00
04/08/24	MCM	Continue review of other diocesan plans for class treatment.	0.70	\$577.50
04/09/24	MCM	Continue review of other diocesan plans for class treatment.	0.50	\$412.50
04/09/24	MDL	Evaluate potential plan provisions.	0.20	\$160.00
04/10/24	MCM	Work on draft memoranda regarding issues class treatment options in confirmed diocesan bankruptcy plans.	0.50	\$412.50
04/11/24	MCM	Attention to case updates from other diocesan and religious-order bankruptcies, including updates to pending case chart.	1.20	\$990.00
04/11/24	MCM	Work on draft memoranda regarding issues class treatment options in confirmed diocesan bankruptcy plans.	0.70	\$577.50
04/12/24	MCM	Attention to case updates from other diocesan and religious-order bankruptcies, including updates to pending case chart.	3.00	\$2,475.00

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04/17/24	MCM	Work on plan strategy in connection with preparation of term sheet or similar document.	1.00	\$825.00
04/18/24	MCM	Analyze issues in connection with Plan of Reorganization.	1.00	\$825.00
04/19/24	MCM	Analyze issues in connection with Plan of Reorganization.	1.00	\$825.00
04/22/24	MCM	Draft plan outline and potential timeline for same.	0.50	\$412.50
04/23/24	MCM	Continue working on Plan outline and timeline for same.	0.80	\$660.00
04/24/24	MCM	Draft deck for plan outline and timeline and transmit to M. Lee for review and comment related to potential term sheet (1.0); review opinion in Camden case denying stay pending appeal (.4); review email memorandum from S. Moses regarding same (.4).	1.80	\$1,485.00

Task Total: 15.40 \$12,700.00

008 Communications with Client

04/02/24	AMUE	Meeting with M. Kemner regarding mediation strategy.	0.80	\$740.00
04/02/24	MDL	Telephone conference with P. Bongiovanni regarding real estate sale proceeds issue.	0.20	\$160.00
04/04/24	MDL	Telephone conference with P. Bongiovanni regarding title verification matter.	0.50	\$400.00
04/04/24	MDL	Begin to draft email correspondence with A. Bardos and P. Bongiovanni regarding turnover demand to Bennett Trust.	0.30	\$240.00
04/04/24	SJM	Email correspondence with A. Bardos regarding CCCEB quarterly payment.	0.20	\$150.00
04/05/24	MDL	Telephone conference with M. Kemner regarding terms of VeraCruz engagement and adjustments to his own expected hours worked estimate going forward.	0.20	\$160.00
04/05/24	MDL	Telephone conference with client regarding priority real estate.	1.00	\$800.00

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04/05/24	SJM	Email correspondence with A. Bardos regarding cash management order notice requirements.	0.50	\$375.00
04/08/24	MDL	Email correspondence with P. Bongiovanni regarding real estate title issues.	0.10	\$80.00
04/08/24	MDL	Email correspondence with P. Bongiovanni regarding LOIs for real estate.	0.10	\$80.00
04/09/24	MDL	Finalize email to A. Bardos regarding dispute with Bennett Trust.	0.10	\$80.00
04/09/24	MDL	Telephone conference with M. Kemner regarding death of employee and claims impacted by same.	0.10	\$80.00
04/11/24	MDL	Telephone conference with P. Bongiovanni regarding real estate title issues.	0.30	\$240.00
04/12/24	MDL	Telephone conference with M. Kemner and A. Uetz regarding mediation strategy for 4/15 and 4/16 sessions and likely agenda for same.	0.30	\$240.00
04/12/24	MDL	Telephone conference with P. Bongiovanni regarding details of potential real estate sale.	0.20	\$160.00
04/12/24	SJM	Coordinate with client and VeraCruz regarding finance transition check-in call.	0.30	\$225.00
04/17/24	AMUE	Communication with M. Kemner and client leadership regarding privileged mediation matter.	0.60	\$555.00
04/18/24	MDL	Telephone conference with P. Bongiovanni regarding real estate issues.	0.30	\$240.00
04/19/24	MDL	Telephone conference with M. Kemner regarding status of OCP supplemental motion and objections to same.	0.10	\$80.00
04/19/24	MDL	Email exchange with P. Bongiovanni regarding Non-Debtor Catholic Entity and parish assets.	0.20	\$160.00
04/22/24	AMUE	Draft extensive privileged summary strategy memorandum to client regarding mediation.	1.80	\$1,665.00
04/22/24	AMUE	Email communication with M. Kemner regarding OCP matter.	0.30	\$277.50

04/23/24	AMUE	Meeting with M. Kemner and M. Lee regarding mediation follow-up items (.5); further communication with M. Kemner regarding OCP order (.6); communication with A. Bardos regarding OCP matter (.5); draft privileged communication to client leadership regarding mediation matter (.9).	2.50	\$2,312.50
04/23/24	MDL	Telephone conference with M. Kemner and A. Uetz regarding fee examiner motion status, non-debtor entity issues, and ordinary course professional supplemental order issues.	0.60	\$480.00
04/29/24	AMUE	Email communication with P. Bongiovanni regarding privileged issue concerning mediation.	0.40	\$370.00
		Task Total:	12.00	\$10,350.00

009 Corporate Governance and Board Issues

04/05/24	EPK	Brief call with M. Kiel regarding corporate structure analysis project (.1); post-call email correspondence with M. Kiel with relevant descriptions of Non-Debtor Catholic Entities (.3); compile corporate documents to be reviewed by the corporate team (.2).	0.60	\$480.00
04/05/24	MSK	Teleconference with E. Khatchatourian regarding corporate analysis of Non-Debtor Catholic Entities (.2); correspondence with J. Lazaro and E. Khatchatourian regarding corporate documents and materials in connection with analysis of Non-Debtor Catholic Entities (.3); preliminary review of formation and governance documents (.6).	1.10	\$852.50
04/08/24	JAL	Analyze formation and governance documents for all entities indicated, and draft bullet point analysis on each as requested by M. Kiel (2.8); conduct review of relevant California statutes in connection with analysis (1.0); review relevant materials for analysis (.3).	4.10	\$2,460.00
04/08/24	MSK	Preliminary review of formation and governance documents.	0.40	\$310.00

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04/09/24	EPK	Confer with M. Kiel and J. Lazaro regarding project analyzing corporate structure of Non-Debtor Catholic Entities, including open due diligence items (.5); review corporate status information for Charities organization (.3); review work product prepared by the Foley corporate team regarding corporate structure and governance of certain of the Non-Debtor Catholic Entities (.2).	1.00	\$800.00
04/09/24	JAL	Analyze corporate formation and governance documents of the entities provided (1.9); finalize bullet point summary work product (1.0).	2.90	\$1,740.00
04/09/24	MSK	Prepare analysis of formation and governance documents (1.6); draft summary and outline slides to be included in mediation presentation in connection with non-debtor entities (.6); exchange correspondence with E. Khatchatourian and J. Lazaro regarding non-debtor entities analysis (.3).	2.50	\$1,937.50
04/15/24	MCM	Draft memorandum regarding analysis of bond documents and obligated group information in connection with asset ownership.	1.00	\$825.00
04/16/24	EPK	Email correspondence with A. Uetz regarding supplemental analysis of corporate governance structure of the Non-Debtor Catholic Entities.	0.20	\$160.00
04/18/24	EPK	Review board compositions of the Non-Debtor Catholic Entities.	0.30	\$240.00
04/19/24	EPK	Continue to analyze governance structure of each Non-Debtor Catholic Entity.	0.40	\$320.00
04/22/24	EPK	Call with A. Uetz to discuss corporate governance/structure analysis and factual information to be updated and included in same (.3); coordinate with J. Harrison regarding chart work product to be created relating to same (.1).	0.40	\$320.00
04/23/24	EPK	Compile corporate structure and governance analyses for J. Harrison to convert into chart format (.3); discuss same with J. Harrison (.3); follow-on emails with J. Harrison regarding organization of chart and descriptions to be inserted in same (.2).	0.80	\$640.00

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04/23/24	JCH	Call with E. Khatchatourian regarding Corporate Structure/Governance chart (.2); prepare draft chart (.8).	1.00	\$300.00
04/26/24	EPK	Continue to work on corporate structure chart and related status notes per client's request (.8); email to A. Uetz regarding status of same (.1).	0.90	\$720.00
04/29/24	EPK	Email correspondence with A. Uetz regarding status of corporate governance analysis related to the Non-Debtor Catholic Entities (.2); work on updates to corporate structure and governance chart (.2).	0.40	\$320.00
04/30/24	EPK	Further revisions to the Non-Debtor Catholic Entity corporate governance chart to incorporate information relating to corporate purposes and restrictions.	1.30	\$1,040.00
04/30/24	JAL	Review materials provided by J. Witt regarding written consent of board, bylaws and suggested corporate actions (.3); begin editing consent (.3).	0.60	\$360.00
Task Total:			19.90	\$13,825.00

011 Cash Management

04/15/24	SJM	Meeting with C. de Quesada and D. Flanagan regarding finance issues check-in call.	0.30	\$225.00
04/28/24	EPK	Email correspondence with J. Kohout regarding status of supplemental restricted cash analysis.	0.20	\$160.00
04/29/24	EPK	Review email correspondence from D. Flanagan of VeraCruz regarding updates to the parish cash substantiation data collection and analysis (.2); review spreadsheets summarizing data related to same (.2); conference call with RCBO, VeraCruz, and Foley teams to discuss same (.4); review post-call email from D. Flanagan of VeraCruz regarding updated restricted cash substantiation tracker (.1).	0.90	\$720.00
04/29/24	JJK	Analyze issues regarding restricted gifts.	0.40	\$350.00
04/29/24	SJM	Participate in restricted cash substantiation call with E. Khatchatourian, D. Flanagan, A. Bardos, and P. Bongiovanni.	0.40	\$300.00

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04/30/24	SJM	Review documents regarding stock donation for the benefit of St. James Parish (.3); email correspondence with J. Ang and P. Bongiovanni regarding same (.4); draft email notice of transfer of proceeds from restricted donation (.6).	1.30	\$975.00
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Task Total:	3.50	\$2,730.00
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014 Exclusivity

04/01/24	JCH	Email correspondence with S. Moses regarding motion to extend exclusivity (.2); calendar filing deadline regarding same (.2).	0.40	\$120.00
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04/01/24	SJM	Respond to E. Khatchaturian regarding timing for filing further exclusivity motion.	0.20	\$150.00
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04/02/24	MDL	Telephone conference with S. Moses regarding upcoming motions to extend exclusivity and to supplement OCP order.	0.60	\$480.00
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04/03/24	SJM	Continue drafting third motion to extend exclusivity (3.1); prepare declaration of P. Bongiovanni in support of same (.7); prepare proposed order in support of same (.2); prepare notice of hearing on same (.2).	4.20	\$3,150.00
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04/04/24	EPK	Follow up on status of motion to extend exclusivity periods.	0.10	\$80.00
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04/04/24	MDL	Revise draft of motion to further extend exclusivity, supporting declaration, notice of motion, and proposed order.	2.40	\$1,920.00
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04/04/24	SJM	Incorporate comments from M. Lee into exclusivity motion documents (.6); email correspondence with P. Bongiovanni regarding declaration in support of exclusivity motion (.2).	0.80	\$600.00
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04/05/24	JCH	Finalize Debtor's Third Motion to Extend Exclusivity, Declaration in support and Notice of Hearing (.3); file same (.2) calendar hearing date and response deadline regarding same (.2).	0.70	\$210.00
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04/05/24	MDL	Revise motion to extend exclusivity in advance of filing of same.	0.40	\$320.00
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04/05/24	SJM	Finalize exclusivity motion.	0.40	\$300.00
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04/07/24	EPK	Review plan exclusivity dates (.1); evaluate information supporting further extension of same (.1); review internal case task list (.1).	0.30	\$240.00
04/22/24	JCH	Finalize certificate of no objection to Debtor's Third Motion to Extend Exclusive Periods.	0.50	\$150.00
04/22/24	SJM	Revise proposed order granting exclusivity motion (.2); review CNO regarding same (.2).	0.40	\$300.00
04/24/24	JCH	Calendar extended exclusive periods regarding Plan filing and Plan solicitation.	0.50	\$150.00
04/24/24	SJM	Email to case team regarding entered exclusivity order.	0.20	\$150.00
		Task Total:	12.10	\$8,320.00

016 General Case Strategy (includes team calls)

04/01/24	MCM	Review case filing by Roman Catholic Bishop of Sacramento and draft email to Foley team regarding same.	0.60	\$495.00
04/02/24	AMUE	Get update on five team member work streams in order to outline strategy related to additional assignments in chapter 11 case.	1.20	\$1,110.00
04/02/24	MDL	Draft list of priority tasks for short-term completion with respect to mediation, discovery, and estate administration.	0.50	\$400.00
04/02/24	SJM	Call with M. Lee regarding continued exclusivity motion, transfer of finance responsibilities, and other issues.	0.60	\$450.00
04/03/24	AMUE	Meeting with P. Pascuzzi to understand developments in other diocese cases.	0.60	\$555.00
04/03/24	AMUE	Meeting with Foley team to outline privileged deliverables in support of mediation.	1.00	\$925.00
04/03/24	EPK	Foley team coordination conference call to discuss near-term tasks, delegation of assignments, and general case strategy.	1.10	\$880.00
04/03/24	MCM	Strategy conference with Foley team regarding work streams and case assignments.	1.00	\$825.00

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04/03/24	MDL	Evaluate status of Camden confirmation order and insurers' efforts to stay effectiveness of same.	0.30	\$240.00
04/03/24	MDL	Meeting with Foley team regarding status of insurance adversary proceeding, discovery, and research tasks.	1.10	\$880.00
04/03/24	MR	Attend strategy call with A. Uetz, M. Lee, M. Moore, E. Khatchatourian, S. Moses and M. Rofaail regarding coordination of various key work streams.	1.10	\$759.00
04/03/24	MRL	Attend check-in and work stream meeting with the Foley team to discuss all ongoing assignments.	1.10	\$627.00
04/03/24	SJM	Email to Vera Cruz regarding check in on transition of responsibilities from A&M.	0.20	\$150.00
04/03/24	SJM	Attend Foley team meeting regarding work allocation and pending projects (1.1); email to E. Khatchatourian regarding transition of financial reporting responsibilities to VeraCruz (.2).	1.30	\$975.00
04/05/24	SJM	Email correspondence regarding appearances for upcoming hearings.	0.30	\$225.00
04/10/24	MCM	Prepare for pre-mediation meeting with A. Uetz and M. Lee regarding status of outstanding research and other issues (1.4); meeting with A. Uetz and M. Lee to discuss case status and prepare for mediation (1.0); email correspondence with information for Committee following same (.5).	2.90	\$2,392.50
04/12/24	MCM	Analyze Debtor assets in connection with mediation and plan formulation.	0.50	\$412.50
04/12/24	MDL	Analyze documentation of parish property held in trust.	0.20	\$160.00
04/12/24	MDL	Provide instruction to S. Moses and J. Harrison regarding parish property held in trust.	0.10	\$80.00
04/12/24	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$570.00
04/12/24	SJM	Draft email to A. Uetz regarding financial transition update.	0.60	\$450.00
04/15/24	AMUE	Call with P. Pascuzzi and his team to discuss case developments.	0.80	\$740.00

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04/15/24	MDL	Telephone conference with attorneys for Roman Catholic Bishop of Santa Rosa regarding insurance coverage questions.	0.50	\$400.00
04/15/24	MDL	Strategize regarding Committee settlement proposal and sequencing of necessary events in connection with same.	1.50	\$1,200.00
04/15/24	SJM	Email to E. Ridley regarding upcoming hearings.	0.20	\$150.00
04/18/24	MDL	Revise insert to audit report on chapter 11 bankruptcy.	0.20	\$160.00
04/18/24	MDL	Telephone conference with S. Moses regarding open motions and court coverage for same.	0.20	\$160.00
04/19/24	AMUE	Review finance work stream items with VeraCruz to ensure compliance with Court orders.	0.50	\$462.50
04/19/24	MDL	Telephone conference with A. Uetz regarding valuation of parish assets.	0.30	\$240.00
04/19/24	SJM	Email to A. Uetz and M. Lee regarding update on finance transition and related issues.	0.60	\$450.00
04/22/24	AMUE	Communications with R. Harris regarding discovery in another diocese case.	0.30	\$277.50
04/22/24	SJM	Email correspondence with A. Uetz and J. Harrison regarding preparation for 4/23 status conference (.3); email to A. Uetz summarizing history of fee examiner motion for status conference (.9).	1.20	\$900.00
04/24/24	AMUE	Review status of Camden appeal and potential stay of confirmation order.	0.40	\$370.00
04/24/24	AMUE	Email communication with R. Harris regarding bar date order.	0.30	\$277.50
04/24/24	AMUE	Meeting with R. Harris to compare notes regarding discovery matters.	0.50	\$462.50
04/24/24	SJM	Call with M. Lee regarding results of meet and confer on initial disclosures in district court, protective order filing, and MOR supplemental documents.	0.20	\$150.00

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04/24/24	SJM	Draft summary of status of Diocese of Camden case (2.4); review developments in Diocese of Rockville Center case and draft summary of same (1.8); review developments in Diocese of Buffalo case and draft summary of same (1.3).	5.50	\$4,125.00
04/25/24	MDL	Analyze Judge Lafferty's memorandum regarding order of motions to be addressed at 4/26 hearing.	0.10	\$80.00
04/25/24	MDL	Strategize with A. Uetz regarding 4/26 hearing, ordinary course professionals motion issues, and negotiating points with Committee.	0.50	\$400.00
04/26/24	MR	Attend strategy call with S. Moses and E. Mazzocco regarding status of coverage action against insurers and upcoming deadlines and tasks.	1.40	\$966.00
04/27/24	AMUE	Communication with Foley team leads regarding insurance and corporate structure work streams.	0.60	\$555.00
04/29/24	EPK	Teleconference with S. Moses regarding case administration issues, disclosure obligations, and status of internal work streams.	0.60	\$480.00
04/29/24	MCM	Draft claims update for inclusion in client email.	0.40	\$330.00
04/29/24	MDL	Evaluate options for addressing Cathedral lease as part of reorganization.	0.20	\$160.00
04/29/24	SJM	Call with E. Khatchaturian regarding P. Bongiovanni consulting status, co-defendant stay issues, and CTN (.6); emails with A. Uetz and T. Dolcourt regarding reporting issues (.3).	0.90	\$675.00
04/29/24	SJM	Draft summary of 4/26 hearing results for inclusion in client update.	0.60	\$450.00
Task Total:			35.80	\$28,182.00

017 Hearings and Court Matters

04/07/24	EPK	Review substantive updates to be included in next status conference statement.	0.20	\$160.00
04/10/24	MDL	Appear at status conference for Debtor.	1.10	\$880.00

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04/10/24	MDL	Telephone conference with S. Moses regarding status conference preparation and possible outcomes of requests for guidance from Judge Lafferty.	0.30	\$240.00
04/10/24	MDL	Prepare for status conference before Judge Lafferty.	0.30	\$240.00
04/18/24	MDL	Appear for Debtor at case management conference.	0.80	\$640.00
04/23/24	AMUE	Prepare for court status conference regarding 2004 motion and U.S. Trustee motion for fee examiner (.8); appearance at same hearing (1.0).	1.80	\$1,665.00
04/23/24	ERR	Attend (remotely) hearing regarding case status and issues regarding insurers' 2004 discovery regarding reserves.	0.80	\$780.00
04/23/24	MDL	Appear at status conference for Debtor.	1.00	\$800.00
04/23/24	SJM	Attend status hearing on fee examiner motion and discovery motions (for part).	0.40	\$300.00
04/25/24	SJM	Email to case team regarding Court memorandum on 4/26 hearing.	0.30	\$225.00
04/26/24	MDL	Appear for Debtor at hearing on competing discovery motions (only attended part of the hearing).	4.50	\$3,600.00
04/26/24	SJM	Attend (for part) hearings on motion to increase OCP caps and motions regarding Committee 2004 discovery (2.3); email correspondence with E. Ridley regarding insurer positions (.3); email to case team regarding results of hearing (.5); telephone call with G. Albert regarding status of district court appeal (.2).	3.30	\$2,475.00
Task Total:			14.80	\$12,005.00

018 Non-Bankruptcy Litigation

04/08/24	EPK	Confer with A. Uetz and M. Lee regarding administrative management of individual actions in the JCCP by way of add-ons.	0.60	\$480.00
04/08/24	MDL	Evaluate state court plaintiffs' administrative consolidation proposal.	0.20	\$160.00

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04/09/24	EPK	Confer with A. Uetz and M. Lee regarding addition of individual state court actions to the JCCP and feedback to the Committee regarding same (.3); draft proposed response to the Committee regarding JCCP add-on issue (.3).	0.60	\$480.00
04/22/24	AROU	Attention to JCCP 5108 case management conference statement.	0.40	\$320.00
04/23/24	AMUE	Review CMC in the JCCP 5108 proceeding (.3); review information related to state court cases against non-debtor defendants (.7); provide direction to Foley team regarding CMC appearance in light of statements/positions in CMC attributed to RCBO (.5).	1.50	\$1,387.50
04/23/24	AROU	Attention to topics for JCCP 5108 case management conference and correspond with liaison counsel.	0.20	\$160.00
04/23/24	AROU	Email correspondence with co-defendant re: litigation.	0.30	\$240.00
04/23/24	EPK	Review CMC statement filed in the JCCP 5108 (.2); draft issues list regarding automatic stay issues raised in same (.2).	0.40	\$320.00
04/23/24	MDL	Strategize regarding appearance at CMC and stipulation with R. Simons regarding joint case administration under JCCP 5108.	0.30	\$240.00
04/24/24	EPK	Prepare for CMC in JCCP 5108 (.4); attend JCCP 5108 CMC to make acknowledgments on behalf of RCBO relating to automatic stay issues raised in the CMC statement (.9).	1.30	\$1,040.00
04/24/24	KAFA	Analysis of state court stay issues related to co-defendants.	0.40	\$158.00
04/30/24	EPK	Review CMC order issued in the JCCP 5108 (.1); email correspondence with A. Ouellette regarding same (.1).	0.20	\$160.00
Task Total:			6.40	\$5,145.50

020 Retention/Billing/Fee Applications for Debtor Professionals

04/08/24	TND	Review email regarding information on March fee statement.	0.10	\$73.50
04/09/24	JCH	Prepare certificates of no objection for Foley and A&M February 2024 monthly fee statements.	0.50	\$150.00
04/09/24	SJM	Revise certificates of no objection as to Foley and A&M monthly fee statements (.3); email to C. Moore regarding same (.1).	0.40	\$300.00
04/10/24	JCH	Call with A. Estrada at KCC to confirm new wire instructions.	0.20	\$60.00
04/10/24	SJM	Email to A. Bardos regarding Breall CNO.	0.20	\$150.00
04/12/24	MDL	Strategize regarding Committee demand to make VeraCruz a retained professional.	0.30	\$240.00
04/16/24	TND	Review information needed for March fee statement to ensure compliance with U.S. Trustee guidelines.	1.90	\$1,396.50
04/18/24	TND	Further work on March Foley fee statement to ensure compliance with U.S. Trustee guidelines.	0.70	\$514.50
04/19/24	TND	Further preparation of March fee statement to ensure compliance with U.S. Trustee guidelines (1.2); correspondence with Foley team regarding same (.2).	1.40	\$1,029.00
04/22/24	MDL	Email correspondence with B. Weisenberg (Lowenstein) regarding changes to VeraCruz proposed retention.	0.20	\$160.00
04/23/24	TND	Further preparation of March Foley fee statement to ensure compliance with U.S. Trustee guidelines.	0.60	\$441.00
04/24/24	MDL	Analyze revised proposed form of order on fee examiner motion and Committee comments on same.	0.30	\$240.00
04/24/24	MDL	Email correspondence with J. Blumberg (U.S. Trustee's Office) regarding comments to revised proposed order on fee examiner motion.	0.20	\$160.00
04/24/24	TND	Further preparation of March Foley fee statement to ensure compliance with U.S. Trustee Guidelines.	3.10	\$2,278.50

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04/25/24	TND	Further work on March fee statement to ensure compliance with U.S. Trustee Guidelines.	0.30	\$220.50
04/26/24	SJM	Work on application to retain VeraCruz pursuant to section 328.	1.70	\$1,275.00
04/29/24	AMUE	Revisions to monthly fee statement to ensure compliance with UST guidelines.	1.50	\$1,387.50
04/29/24	JCH	Prepare draft of Foley's monthly fee statement for March 2024.	0.50	\$150.00
04/29/24	MDL	Analyze revised proposed order appointing fee examiner sent by U.S. Trustee's office.	0.20	\$160.00
04/29/24	MDL	Email correspondence with J. Blumberg (U.S. Trustee's Office) regarding proposed order on fee examiner motion.	0.10	\$80.00
04/29/24	SJM	Draft email for VeraCruz addressing 328 employment questions.	0.70	\$525.00
04/29/24	TND	Review A&M fee statement for March (.2); email to A&M team with comments to same (.1).	0.30	\$220.50
04/30/24	JCH	Finalize Foley's monthly fee statement for March 2024 (.6); file same (.2); file A&M's monthly fee statement for March 2024 (.2).	1.00	\$300.00
04/30/24	TND	Finalize Foley March Fee Statement to ensure compliance with U.S. Trustee guidelines (.9); communications with A&M regarding March statement (.2); review coversheet for Foley statement before filing (.3).	1.40	\$1,029.00
Task Total:			17.80	\$12,540.50

021 Retention/Fee Applications: Ordinary Course Professionals

04/02/24	MDL	Evaluate terms to be included in ordinary course professionals supplemental motion.	0.10	\$80.00
04/03/24	MDL	Revise supplemental OCP motion and proposed order.	0.70	\$560.00
04/03/24	TND	Review email from M. Lee regarding revised Moss Adams fees under OCP order (.1); analyze cap increase requests in light of proposed budgets (.6).	0.70	\$514.50

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04/04/24	MDL	Email correspondence with M. Kemner and P. Bongiovanni regarding supplemental OCP motion.	0.20	\$160.00
04/04/24	MDL	Revise supplemental OCP motion.	0.40	\$320.00
04/04/24	SJM	Prepare declaration of P. Bongiovanni in support of motion to increase OCP compensation caps (.8); telephone call with M. Lee regarding OCP motion (.1); revise proposed order in support of OCP motion (.2); prepare notice of hearing on OCP motion (.4); email correspondence with P. Bongiovanni regarding declaration and terms of VeraCruz employment (.3).	1.80	\$1,350.00
04/04/24	TND	Review email from A. Uetz on revisions to OCP cap increase motion.	0.10	\$73.50
04/05/24	JCH	Finalize and file Debtor's Motion for Supplemental Order increasing monthly caps for ordinary course professionals, Declaration and order (.5); calendar related hearing and response deadline (.1).	0.60	\$180.00
04/05/24	SJM	Telephone call with M. Lee regarding motion to increase OCP caps (.3); revise motion based on comments from M. Kemner (.4); finalize motion (.3).	1.00	\$750.00
04/05/24	TND	Draft supplemental affidavit for C. deQuesada regarding VeraCruz additional OCP tasks (.4); draft supplemental affidavit for M. Kemner regarding additional OCP tasks (.3); draft amendment to VeraCruz engagement letter (.7).	1.40	\$1,029.00
04/08/24	MDL	Evaluate VeraCruz OCP retention questions and amended engagement letter reflecting additional work to be done by VeraCruz instead of A&M.	0.20	\$160.00
04/08/24	TND	Email correspondence with Foley team, VeraCruz, and client regarding amendment to VeraCruz engagement letter.	0.20	\$147.00
04/11/24	MDL	Telephone conference with C. de Quesada and D. Flanagan (both of VeraCruz) regarding ordinary course professional retention issues.	0.40	\$320.00
04/12/24	TND	Analyze court's comments on A&M fees to prepare response to VeraCruz increased compensation to take over certain tasks.	0.70	\$514.50

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04/18/24	TND	Review transcript regarding A&M costs and shifting responsibilities to VeraCruz (.2); review Kemner March invoice (.2).	0.40	\$294.00
04/22/24	AMUE	Review Committee position regarding OCP motion to amend order (.3) and provide advice to team lead regarding possible resolution of same (.5).	0.80	\$740.00
04/22/24	JCH	Prepare certificate of no objection to Motion to Increase Monthly OCP Caps (.5); prepare Notice of Withdrawal of certificate of no objection (.2).	0.70	\$210.00
04/22/24	MDL	Strategize regarding negotiations with Committee over OCP retention caps.	0.30	\$240.00
04/22/24	MDL	Telephone conference with B. Weisenberg (Lowenstein) regarding OCP retention caps objection.	0.20	\$160.00
04/22/24	SJM	Email correspondence with M. Lee and J. Harrison regarding withdrawal of CNO based on Committee request to address VeraCruz (.3); review notice of withdrawal (.1).	0.40	\$300.00
04/22/24	TND	Review Kemner March invoice (.2); respond to email from M. Kemner (.1).	0.30	\$220.50
04/23/24	MDL	Evaluate ordinary course professional rolling monthly averages under existing and proposed orders and actual fees incurred compared to same.	0.40	\$320.00
04/23/24	SJM	Review emails from A. Uetz regarding OCP issues (.4); email to A. Bardos regarding OCP payment calculation (.2).	0.60	\$450.00
04/23/24	TND	Review of issues related to OCP caps (.8); email correspondence with M. Kemner on March invoice (.3); email correspondence with D. Flanagan regarding OCP issues (.2); draft email correspondence with VeraCruz regarding objection from the Committee on revised OCP Motion and arrangements regarding same (.4).	1.70	\$1,249.50
04/24/24	AMUE	Draft memo for client leadership regarding procedure for approval of amended OCP order and retention application for VeraCruz.	0.40	\$370.00
04/24/24	MDL	Strategize for hearing on OCP supplemental order.	0.20	\$160.00

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04/25/24	SJM	Analyze approach to hearing on OCP motion in light of Committee position (.3); email to case team regarding same (.1).	0.40	\$300.00
04/29/24	TND	Correspondence with D. Flanagan, S. Moses, and A. Uetz on OCP report to be filed 4/30.	0.20	\$147.00
04/30/24	JCH	File Notice of quarterly payments made to ordinary course professionals.	0.20	\$60.00
04/30/24	SJM	Prepare quarterly notice of compliance with OCP order.	0.60	\$450.00
04/30/24	SJM	Telephone call with chambers regarding order authorizing increase in OCP caps (.1); revise proposed order to resubmit (.2).	0.30	\$225.00
Task Total:			16.60	\$12,054.50

022 Retention/Fee Applications: Other Professionals

04/02/24	SJM	Prepare email to client regarding February monthly fee statements.	0.80	\$600.00
04/08/24	SJM	Review monthly fee statement filed by Judge Sontchi (.1); email to A. Bardos regarding same (.2).	0.30	\$225.00
04/09/24	JCH	Prepare chart of interim payments due on Committee and Debtor professionals' monthly fee statements for February 2024.	0.50	\$150.00
04/09/24	SJM	Prepare email to A. Bardos regarding February monthly fee statements and detailing process for same.	0.60	\$450.00
04/18/24	SJM	Email to client regarding payment of Sontchi monthly fee statement.	0.30	\$225.00
Task Total:			2.50	\$1,650.00

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

04/16/24	EPK	Coordination call with S. Moses regarding preparation of next monthly operating report and OCP fees reporting (.4); email correspondence with A. Uetz and S. Moses regarding same (.2); March 2024 MOR coordination emails with the VeraCruz team (.2).	0.80	\$640.00
04/16/24	SJM	Review historical MOR Supplemental files (.6); call with E. Khatchatourian regarding MOR transition (.3); email to A. Uetz regarding MOR status (.2).	1.10	\$825.00
04/17/24	EPK	Conference call with D. Flanagan of VeraCruz and S. Moses to coordinate regarding preparation of the March 2024 MOR, wages order reporting, and OCP payment amounts (.9); email correspondence with D. Flanagan regarding wages order reporting issues (.1).	1.00	\$800.00
04/17/24	SJM	Attend MOR coordination call with E. Khatchatourian, A. Bardos, P. Bongiovanni, and VeraCruz.	0.90	\$675.00
04/18/24	AMUE	Email communication with J. Blumberg regarding motion for fee examiner status conference.	0.30	\$277.50
04/18/24	EPK	Review email from D. Flanagan of VeraCruz regarding draft of March 2024 MOR package (.1); preliminary review of MOR package (.4); email correspondence with S. Moses regarding comments to same (.2).	0.70	\$560.00
04/18/24	SJM	Email correspondence regarding draft MOR.	0.30	\$225.00
04/19/24	EPK	Review email from D. Flanagan of VeraCruz regarding updated March 2024 MOR package (.2); review updated MOR package (.3); draft explanatory footnotes to be inserted in March 2024 MOR (.2); email correspondence with J. Ang regarding debt payments reflected in MOR (.2).	0.90	\$720.00

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04/22/24	EPK	Email correspondence with D. Flanagan of VeraCruz, P. Bongiovanni, and A. Bardos regarding revised explanatory footnotes for March 2024 MOR and revised drafts of same (.4); review revised drafts of March 2024 MOR package (.5); draft comment notes and suggested edits to same (.5); coordinate with J. Harrison regarding filing and service of March 2024 MOR and wages order report (.2); MOR review and approval conference call with the RCBO client team (.4); confer with S. Moses regarding supplemental MOR support files for the BRG team (.1).	2.10	\$1,680.00
04/22/24	JCH	File monthly operating report for March 2024 (.2); review Part 7 on previously filed monthly operating reports (0.4); and email correspondence with E. Khatchatourian regarding same (.1).	0.70	\$210.00
04/22/24	SJM	Attend MOR final approval meeting.	0.40	\$300.00
04/23/24	EPK	Email correspondence with S. Moses, D. Flanagan of VeraCruz, and S. Levitt of A&M regarding supplemental March 2024 MOR documents to be produced to the BRG team.	0.40	\$320.00
04/23/24	SJM	Email correspondence regarding process for handling MOR supplemental files.	0.60	\$450.00
04/29/24	EPK	Follow up on status of U.S. Trustee quarterly fees calculation and payment (.2); review email correspondence from D. Flanagan of VeraCruz and S. Moses regarding same (.2).	0.40	\$320.00
04/29/24	SJM	Emails with D. Flanagan regarding quarter-end reporting requirements.	0.40	\$300.00
04/29/24	SJM	Review calculation of quarterly fee (.3); email to A. Bardos regarding payment of same (.2).	0.50	\$375.00
04/30/24	SJM	Email correspondence with A. Bardos confirming status of quarterly fee payment.	0.30	\$225.00
Task Total:			11.80	\$8,902.50

026 Unsecured Creditor Issues/Communications/Meetings

04/10/24	MDL	Email exchange with B. Weisenberg (Lowenstein) regarding administrative consolidation of certain state court actions into JCCP 5108.	0.20	\$160.00
04/10/24	MDL	Telephone conference with B. Weisenberg (Lowenstein) regarding administrative consolidation of individual state cases into JCCP 5108.	0.20	\$160.00
04/11/24	MDL	Telephone conference with Lowenstein, BRG, A&M, and VeraCruz regarding due diligence process and continuing dialog around financial issues.	0.60	\$480.00
04/22/24	AMUE	Review diligence requests and priority for same from Committee to provide direction to team regarding responding to same.	0.80	\$740.00
04/22/24	MDL	Correspondence with R. Simons and Lowenstein (J. Prol, B. Weisenberg) regarding administrative consolidation of state court actions.	0.20	\$160.00
04/23/24	AMUE	Email communication with B. Weisenberg regarding claims analysis (.2); email communication with B. Weisenberg regarding CTN questions (.2); email communication with J. Prol regarding mediation (.2); analyze request from B. Weisenberg regarding claims (.4); analyze request from B. Weisenberg regarding CTN information (.5).	1.50	\$1,387.50
04/24/24	AMUE	Revise draft communication to Committee counsel regarding request for information on claims analysis.	0.40	\$370.00
04/26/24	AMUE	Edit communication to B. Weisenberg regarding questions about claims.	0.40	\$370.00
04/29/24	MCM	Review email correspondence from Committee counsel requesting additional information on specific claim (.3); telephone conference with counsel regarding same (.4); review client documents and other information concerning claim (1.0); draft email correspondence to Committee providing additional information (.3).	2.00	\$1,650.00

04/30/24	MCM	Email correspondence with Committee counsel regarding mediation meetings in May.	0.40	\$330.00
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	Task Total:	6.70	\$5,807.50
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027 Real Estate and Real Property Issues

04/03/24	MDL	Telephone conference with C. de Quesada (VeraCruz) regarding real estate asset identification.	0.20	\$160.00
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04/03/24	MDL	Participate in meeting with client to discuss valuation.	2.10	\$1,680.00
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04/04/24	EPK	Review email correspondence from P. Bongiovanni regarding sale of RCWC convent (.1); address bankruptcy issues relating to same (.2).	0.30	\$240.00
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04/04/24	MDL	Strategize with A. Uetz regarding real estate issues.	0.50	\$400.00
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04/05/24	EPK	Email correspondence with P. Bongiovanni regarding RCWC property (.1); review title exceptions report with respect to RCWC property sale (.1); review email correspondence with V. Assorian of the title company (.1); confer with M. Lee regarding same (.1).	0.40	\$320.00
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04/08/24	EPK	Review correspondence from V. Assorian of Fidelity National Title Company regarding RCWC property (.1); email to M. Lee and S. Moses regarding same (.1).	0.20	\$160.00
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04/08/24	MDL	Analyze LOIs for real estate.	0.10	\$80.00
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04/08/24	MDL	Email correspondence with A. Uetz regarding LOIs for real estate.	0.10	\$80.00
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04/11/24	MDL	Email exchange with Fidelity National (M. Talbot, W. Martin) regarding real estate title issue.	0.20	\$160.00
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04/11/24	MDL	Participate in meeting with client regarding property considerations.	1.30	\$1,040.00
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04/12/24	EPK	Call with M. Lee to discuss non-estate RCWC property (.2); follow-on emails with M. Lee and S. Moses regarding title issues relating to same (.3).	0.50	\$400.00
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04/12/24	MDL	Telephone conference with Fidelity National (W. Martin, M. Talbot) regarding real estate title issue and documentation question.	0.20	\$160.00
04/12/24	MDL	Telephone conference with E. Khatchatourian regarding real estate title issue.	0.20	\$160.00
04/12/24	MDL	Telephone conference with A. Uetz regarding real estate issues and status of review of properties.	0.10	\$80.00
04/12/24	MDL	Telephone conference with P. Bongiovanni, VeraCruz personnel, A&M (C. Moore and S. Levitt), and A. Uetz regarding real estate assets.	1.00	\$800.00
		Task Total:	7.40	\$5,920.00

029 Non-tort Proofs of Claim

04/04/24	EPK	Brief review of proof of claim asserted by vendor (.1); Foley team correspondence regarding same (.1).	0.20	\$160.00
04/04/24	JCH	Email correspondence with KCC regarding service of notice of bankruptcy filing on creditor, Kelly Spicers Stores.	0.50	\$150.00
04/04/24	SJM	Review late-filed proof of claim from Kelley Spicers Stores (.2); email to KCC regarding non-tort claims register (.2).	0.40	\$300.00
04/05/24	MCM	Email correspondence with counsel for Committee and counsel for claimant regarding late-filed claim and motion to allow same as timely.	0.30	\$247.50
04/05/24	SJM	Email to KCC regarding handling of late-filed proof of claim (.2); analyze register of non-tort claims (1.6).	1.80	\$1,350.00
		Task Total:	3.20	\$2,207.50

031 Insurance Issues (coverage, includes adversary proceeding)

04/01/24	AMUE	Provide advice to team regarding production of proofs of claim to insurers.	0.60	\$555.00
04/01/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.20	\$756.00

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04/01/24	MCM	Attention to matters regarding production of proofs of claim to insurers, including review of production plan and emails related to same (.4); revise master key pursuant to Bar Date Order in anticipation of production to insurers on or about 4/2/2024 and reconcile same against proof of claim database (.6).	1.00	\$825.00
04/01/24	MDL	Telephone conference with R. Stewart regarding production of proofs of claim to insurers.	0.20	\$160.00
04/01/24	MDL	Email correspondence with counsel for insurers regarding production of proofs of claim.	0.60	\$480.00
04/01/24	MDL	Analyze bar date order and protective order terms regarding terms of production of proofs of claim to insurers.	0.20	\$160.00
04/01/24	MR	Substantively review key materials in anticipation of drafting partial motion for summary judgment in adversary proceeding.	0.40	\$276.00
04/01/24	MRL	Review documents in preparation for meeting with the Foley team to discuss drafting the Motion for Partial Judgment in regards to the Clergy III Settlement.	0.30	\$171.00
04/02/24	AMUE	Review reservation of rights letter received from insurer (.3); draft summary update to client regarding same (.3).	0.60	\$555.00
04/02/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.50	\$1,575.00
04/02/24	ERR	Review strategy and authority for summary judgment against insurers re Clergy III reservation.	0.70	\$682.50
04/02/24	KAFA	Preparation of documents to produce to the insurers.	0.40	\$158.00
04/02/24	MCM	Attention to matters regarding production of proofs of claim to insurers, including finalization of master key relating to same (.5); email correspondence with Foley team regarding updated information and transmission to insurers (.3).	0.80	\$660.00
04/02/24	MDL	Correspondence with counsel for insurers regarding production of redacted proofs of claim.	0.10	\$80.00

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04/02/24	MDL	Email exchange with Foley team regarding production of proofs of claim to insurers.	0.20	\$160.00
04/02/24	MR	Attend strategy meeting with E. Ridley and M. Rofaeil regarding partial motion for summary judgment in adversary proceeding.	0.50	\$345.00
04/02/24	MRL	Meeting with E. Ridley and M. Roberts regarding drafting the motion for summary judgment on Clergy III settlement issues (.5); begin research on insurance issues for the Clergy III settlement (1.5).	2.00	\$1,140.00
04/02/24	RTST	Work on producing documents to insurers.	2.40	\$1,776.00
04/03/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	4.90	\$3,087.00
04/03/24	JCH	Review files and court dockets for copies of insurance adversary complaints filed in other diocese bankruptcies.	1.00	\$300.00
04/03/24	JRBL	Analyze other diocesan settlements related to policy releases (2.5); draft summary to M. Roberts (.7).	3.20	\$4,080.00
04/03/24	KAFA	Research L.A. clergy settlement agreement requested by team.	0.30	\$118.50
04/03/24	MCM	Coordinate research into potential claims brought in other diocesan bankruptcies (.3); confer with M. Rofaeil regarding same (.3).	0.60	\$495.00
04/03/24	MCM	Work on issues in connection with tendering of redacted proofs of claim in compliance with bar date order and other rulings of the Court regarding confidentiality (.6); attention to issues regarding production of proofs of claim to insurers and follow-up on confidentiality agreements from same (.4).	1.00	\$825.00
04/03/24	MR	Gather key information in preparation for drafting partial motion for summary judgment (.3); draft Case Management Statement in district court adversary proceeding, per Court's order to submit by April 11, 2024 deadline (.9).	1.20	\$828.00

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04/03/24	MRL	Confer with M. Moore regarding potential arguments in other diocese cases (.2); review other diocese cases to see the arguments against the insurers (1.1).	1.30	\$741.00
04/03/24	MRL	Confer with M. Roberts regarding research for the motion for partial summary judgment (.3); continue research on the insurance issues for the Clergy III settlement (2.1).	2.40	\$1,368.00
04/03/24	RTST	Work on producing documents to the insurers.	1.20	\$888.00
04/04/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.60	\$1,638.00
04/04/24	ERR	Edit status statement for insurance action.	0.80	\$780.00
04/04/24	ERR	Review issues regarding privileged matter in light of mediations.	0.60	\$585.00
04/04/24	ERR	Review case status and upcoming briefing and hearings regarding adversary case matters.	0.60	\$585.00
04/04/24	JCH	Pull copy of case detail and dismissal in New York Supreme Court lawsuit filed by Diocese of New York related to research on a privileged issue.	0.50	\$150.00
04/04/24	MCM	Oversight of research and analysis of M. Rofaeil into privileged issue and review of other diocesan cases asserting same (.4); analyze issues concerning same based on state-court filings by other dioceses (.4).	0.80	\$660.00
04/04/24	MDL	Revise case management order.	0.60	\$480.00
04/04/24	MR	Complete of draft Case Management Statement in district court adversary proceeding, per Court's order to submit by April 11, 2024 deadline (.7); revise Case Management Statement to include information from and citations to various related case dockets (.5); communicate with counsel for Committee regarding proposed adversary proceeding case schedule (.1).	1.30	\$897.00
04/04/24	MRL	Continue reviewing other diocese cases to determine if privileged issues had been raised previously (1.9); draft email with all research to M. Moore (.2).	2.10	\$1,197.00

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04/04/24	MRL	Continue research on the issues for the Motion for Partial Summary Judgment on the Clergy III settlement.	0.70	\$399.00
04/04/24	RTST	Work on producing documents to the insurers.	0.20	\$148.00
04/05/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim (3.9); confer with K. Farrar regarding verification of which claimants were previously tendered to AJG (.3).	4.20	\$2,646.00
04/05/24	ERR	Review additional edits to joint case management statement.	0.60	\$585.00
04/05/24	KAFA	Analysis of supplemental proof of claim tenders for D. Abbasi.	0.40	\$158.00
04/05/24	MCM	Attention to issues regarding supplemental tendering of claims to insurers and related matters.	0.40	\$330.00
04/05/24	MDL	Telephone conference with Committee counsel (M. Kaplan, B. Weisenberg, T. Burns, J. Bair) regarding proposed dates for case management report.	0.50	\$400.00
04/05/24	MDL	Email correspondence with Committee counsel (M. Kaplan, B. Weisenberg, T. Burns, J. Bair) regarding draft case management report.	0.20	\$160.00
04/05/24	MDL	Revise case management report.	0.40	\$320.00
04/05/24	MDL	Evaluate proposed changes to case management report made by Committee counsel.	0.20	\$160.00
04/05/24	MR	Revise draft of Case Management Statement in district court adversary proceedings and send draft of same to counsel for insurers (.7); attend teleconference with counsel for Committee to discuss draft schedule in adversary proceeding (.5); communicate with M. Lee in follow-up to same regarding revised draft of Case Management Statement (.2).	1.40	\$966.00
04/05/24	MRL	Continue research on issues for the Motion for Partial Summary Judgment on the Clergy III settlement.	2.30	\$1,311.00
04/05/24	RTST	Work on producing documents to the insurers.	0.30	\$222.00
04/06/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.50	\$1,575.00

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04/06/24	MRL	Continue research on the issues for the Motion for Partial Summary Judgment on the Clergy III settlement.	1.20	\$684.00
04/07/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	3.90	\$2,457.00
04/08/24	MRL	Continue research on the issues for the Motion for Partial Summary Judgment on the Clergy III settlement (1.8); begin drafting the motion (1.0).	2.80	\$1,596.00
04/09/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.70	\$1,701.00
04/09/24	ERR	Begin review of draft joint status conference statement.	0.50	\$487.50
04/09/24	ERR	Review issues related to upcoming status conference regarding insurance claims withdrawal and potential dispositive motions.	0.60	\$585.00
04/09/24	JRBL	Communication with E. Ridley regarding Clergy III settlements and coverage analysis.	1.60	\$2,040.00
04/09/24	JRBL	Assist with analysis of insurance coverage issues per request of R. Stewart.	2.30	\$2,932.50
04/09/24	MCM	Follow up on supplemental tender issues in connection with confidentiality procedures and related orders.	0.40	\$330.00
04/09/24	MDL	Analyze insurers' edits to case management report.	0.20	\$160.00
04/09/24	MDL	Email exchange with E. Ridley and M. Roberts regarding additional inserts to case management report following insurers' turn of draft.	0.30	\$240.00
04/09/24	MR	Research case law supporting key arguments in draft motion for partial summary judgment on Clergy III settlement issue (1.9); review insurers' proposed changes to Case Management Statement in district court adversary proceedings (.3).	2.20	\$1,518.00
04/09/24	MRL	Begin drafting outline of the motion for partial summary judgment regarding the Clergy III settlement (.3); confer with M. Roberts regarding status of the research (.4).	0.70	\$399.00

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04/10/24	AMUE	Provide advice regarding case management conference positions (.9); review case management order (.5); review emails from counsel for insurers regarding case management conference (.6); email with M. Kaplan regarding Bankruptcy Court status conference regarding insurer and UCC discovery motions (.4).	2.40	\$2,220.00
04/10/24	JCH	Review docket of Buffalo Diocese case for objection filed to Burns Bair retention.	0.20	\$60.00
04/10/24	MDL	Revise draft case management report.	1.10	\$880.00
04/10/24	MDL	Email exchange with Foley team regarding production of redacted proofs of claim to CIGA's counsel.	0.20	\$160.00
04/10/24	MDL	Telephone conference with A. Uetz regarding insurers' and Committee's comments to case management report.	0.80	\$640.00
04/10/24	MR	Revise draft Rule 26 Case Management Statement in district court proceedings against insurers (.8); research additional case law supporting key arguments for partial motion for summary judgment regarding Clergy III settlement issue (.9).	1.70	\$1,173.00
04/10/24	MRL	Begin drafting the motion for partial summary judgment regarding the Clergy III settlement.	1.90	\$1,083.00
04/10/24	RTST	Work on producing documents to the insurers.	1.00	\$740.00
04/10/24	SJM	Email to E. Ridley regarding planning for adversary proceeding hearing on April 26.	0.20	\$150.00
04/11/24	AMUE	Review email from T. Burns regarding case management issue (.3) and email from M. Plevin regarding case management issue (.2); provide input regarding case management statement (.5).	1.00	\$925.00
04/11/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	5.00	\$3,150.00
04/11/24	ERR	Review additional edits to joint case status statement.	1.40	\$1,365.00
04/11/24	ERR	Review briefing regarding motion to quash 2004 requests to insurers.	0.80	\$780.00

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04/11/24	MDL	Email exchange with counsel for insurers regarding revised case management report.	0.40	\$320.00
04/11/24	MDL	Telephone conference with M. Plevin (Crowell & Moring) regarding specific terms in case management report.	0.10	\$80.00
04/11/24	MDL	Strategize regarding changes and additions to case management report.	0.40	\$320.00
04/11/24	MDL	Revise case management report.	1.10	\$880.00
04/11/24	MR	Revise draft Rule 26 Case Management Statement in district court proceedings against insurers.	0.70	\$483.00
04/11/24	MRL	Continue drafting motion for partial summary judgment regarding the Clergy III settlement.	2.00	\$1,140.00
04/11/24	SJM	Assist with finalizing joint case management statement in coverage litigation.	1.30	\$975.00
04/12/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	0.50	\$315.00
04/12/24	MRL	Continue drafting motion for partial summary judgment regarding the Clergy III settlement.	2.30	\$1,311.00
04/13/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.20	\$1,386.00
04/13/24	MRL	Continue drafting motion for partial summary judgment regarding the Clergy III settlement.	1.30	\$741.00
04/14/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.50	\$1,575.00
04/14/24	MDL	Evaluate Committee's position on issues to be decided in adversary proceeding versus individual state court cases.	0.20	\$160.00
04/14/24	MRL	Continue drafting motion for partial summary judgment regarding the Clergy III settlement.	2.30	\$1,311.00
04/15/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	0.90	\$567.00
04/15/24	ERR	Meeting with insurance counsel for SF and other dioceses regarding insurance matters.	0.70	\$682.50
04/15/24	MR	Revise draft of partial motion for summary judgment regarding Clergy III settlement issue.	1.50	\$1,035.00

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04/15/24	MRL	Finalize motion for partial summary judgment regarding the Clergy III settlement.	2.30	\$1,311.00
04/15/24	RTST	Work on producing documents to the insurers.	0.80	\$592.00
04/16/24	MCM	Email correspondence regarding production of documents to certain insurers and execution of necessary agreements related to same.	0.30	\$247.50
04/16/24	MR	Revise further draft of partial motion for summary judgment regarding Clergy III settlement issue.	1.20	\$828.00
04/16/24	MRL	Email correspondence with M. Roberts regarding edits to the motion for partial summary judgment regarding the Clergy III settlement (.2); revise the motion based on M. Roberts' edits and comments (2.5).	2.70	\$1,539.00
04/16/24	RTST	Work on producing documents to the insurers.	1.60	\$1,184.00
04/16/24	SJM	Email correspondence regarding appearances and preparation for district court cases management conference.	0.40	\$300.00
04/17/24	AMUE	Provide advice regarding privileged matter.	0.80	\$740.00
04/17/24	JRBL	Analysis of policy release issues raised by carriers including review of related documents.	2.70	\$3,442.50
04/17/24	JRBL	Communication with M. Roberts regarding policy release issue.	0.30	\$382.50
04/17/24	KAFA	Update tracker of documents produced to counsel to insurers.	0.30	\$118.50
04/17/24	MRL	Revise the motion for partial summary judgment regarding the Clergy III settlement based on M. Roberts' edits and comments (1.8); draft email regarding the motion to the Foley team (.2); review email from J. Blease regarding the LA settlement (.2); review documents relating to the LA settlement in comparison to the Clergy III settlement (.5).	2.70	\$1,539.00
04/17/24	RTST	Work on producing documents to the insurers.	1.00	\$740.00
04/18/24	ERR	Prepare for (1.9) and attend status conference before Judge Corley regarding insurance actions (0.8).	2.70	\$2,632.50

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04/18/24	JRBL	Further analysis of policy release issues and documents.	2.40	\$3,060.00
04/18/24	MDL	Telephone conference with E. Ridley regarding preparation and strategy for case management conference.	0.30	\$240.00
04/18/24	MDL	Email correspondence with J. Daniels (O'Melveny Myers) regarding steps necessary for production of proofs of claim and discovery documentation.	0.10	\$80.00
04/18/24	MDL	Draft summary of insurer arguments in case management report for reference during case management conference.	1.20	\$960.00
04/18/24	MDL	Prepare for case management conference.	0.30	\$240.00
04/18/24	MDL	Telephone conference with E. Ridley regarding results of case management conference and short-term tasks in adversary proceeding.	0.30	\$240.00
04/18/24	MR	Review Northern District of California Local Rules to determine requirements for timing and format of Rule 26 initial disclosures.	0.30	\$207.00
04/18/24	RTST	Work on producing documents to the insurers.	0.50	\$370.00
04/18/24	SJM	Attend district court case management conference in adversary proceeding (partial) (.5); draft email summarizing results of same (.6); telephone call with M. Lee regarding tasks from CMC (.3).	1.40	\$1,050.00
04/19/24	AMUE	Review outcome of insurance case management conference (.4) and revise client update regarding same (.3); provide advice regarding initial disclosures to comply with Court's order regarding same (.5).	1.20	\$1,110.00
04/19/24	AMUE	Review issue concerning privileged matter.	0.80	\$740.00
04/19/24	ERR	Review case management orders from Judge Corley on insurance matters.	0.40	\$390.00
04/19/24	MDL	Evaluate court order following case management conference.	0.10	\$80.00
04/19/24	MDL	Provide instruction to M. Roberts regarding demand for meet and confer over initial disclosures deadline.	0.10	\$80.00

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04/19/24	MR	Communicate with all counsel for insurers in district court proceedings regarding meet and confer on timing and scope of initial disclosures, per Court's order.	0.20	\$138.00
04/21/24	MCM	Email correspondence with Foley team regarding production of redacted proofs of claim to certain insurers.	0.30	\$247.50
04/22/24	ERR	Review issues regarding scope of disclosures.	0.50	\$487.50
04/22/24	ERR	Review case strategy regarding disclosures per Corley order.	0.40	\$390.00
04/22/24	MCM	Attention to matters concerning production of documents to insurers pursuant to various Court orders.	0.40	\$330.00
04/22/24	MR	Communicate with counsel for insurers regarding meet and confer on timing and scope of Rule 26 Disclosures, per district court's order.	0.10	\$69.00
04/22/24	RTST	Work on producing documents to the insurers.	0.90	\$666.00
04/23/24	KAFA	Prepare documents for production to insurer counsel.	1.00	\$395.00
04/23/24	KRD	Analyze CIGA's motion to dismiss filings in the district court.	0.30	\$205.50
04/23/24	MCM	Attention to matters concerning execution of confidentiality agreements by insurers relating to production of documents to same.	0.40	\$330.00
04/23/24	MR	Further communicate with counsel for insurers regarding meet and confer on timing and scope of Rule 26 Disclosures, per district court's order.	0.10	\$69.00
04/23/24	RTST	Work on producing documents to the insurers.	0.80	\$592.00
04/23/24	SJM	Draft notice of related case regarding second insurance adversary proceeding for filing in district court (1.4); draft notice of bankruptcy case protective order for filing in district court (.6).	2.00	\$1,500.00
04/24/24	EPM	Conference call with A. Uetz regarding privileged case strategy.	0.70	\$525.00
04/24/24	MCM	Email correspondence regarding Committee confidentiality agreements in connection with insurer requests.	0.30	\$247.50

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04/24/24	MDL	Draft summary of meet and confer with insurer counsel on initial disclosure timing and scope.	0.20	\$160.00
04/24/24	MDL	Analyze notice of related case for district court action.	0.10	\$80.00
04/24/24	MDL	Prepare for meet and confer with insurer counsel on initial disclosure timing and scope.	0.20	\$160.00
04/24/24	MDL	Appear for Debtor at meet and confer with insurer counsel on initial disclosure timing and scope.	0.90	\$720.00
04/24/24	MDL	Evaluate T. Schiavoni claim regarding entitlement to copies of signed confidentiality agreements and discovery acknowledgments.	0.10	\$80.00
04/24/24	MDL	Provide instruction to S. Moses regarding drafting of summary of meet and confer with insurer counsel on initial disclosure timing and scope.	0.10	\$80.00
04/24/24	MR	Attend meet and confer videoconference with insurers' counsel on timing and scope of Rule 26 Disclosures, per district court's order (.9); communicate with M. Lee regarding follow-up items from same (.1).	1.00	\$690.00
04/24/24	RTST	Work on producing documents to the insurers.	0.70	\$518.00
04/24/24	SJM	Email to J. Breall regarding notice of related case.	0.20	\$150.00
04/25/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	4.70	\$2,961.00
04/25/24	ERR	Revise protective order and disclosure issues along with recent filings by insurers per court order in coverage action.	0.50	\$487.50
04/25/24	JCH	File notices in district court case related to deadlines listed in Pretrial Order.	0.50	\$150.00
04/25/24	KRD	Review motion to dismiss briefing filed by Pacific.	0.20	\$137.00
04/25/24	MCM	Provide Committee confidentiality agreements regarding proofs of claim at request of insurers.	0.40	\$330.00
04/25/24	MDL	Revise summary of meet and confer on initial disclosures.	0.10	\$80.00
04/25/24	MDL	Email exchange with J. Breall regarding notice of related case.	0.10	\$80.00

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04/25/24	MDL	Provide instruction to S. Moses regarding submission of notice of related case and protective order.	0.10	\$80.00
04/25/24	MR	Communicate with A. Uetz and S. Moses regarding research into insurance coverage issues (.2); identify key materials for background in furtherance of same research issues (.2).	0.40	\$276.00
04/25/24	SJM	Call with M. Roberts and A. Uetz regarding work assignments for adversary proceeding.	0.20	\$150.00
04/25/24	SJM	Finalize notices for filing in district court (.3); draft statement regarding compliance with meet and confer requirements (.6).	0.90	\$675.00
04/26/24	AMUE	Review supplemental information for tender of insurance claims.	0.50	\$462.50
04/26/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	5.10	\$3,213.00
04/26/24	EPM	Begin review of coverage litigation pleadings (1.2); conference call with M. Roberts and S. Moses to discuss strategy and upcoming tasks in coverage litigation (1.5).	2.70	\$2,025.00
04/26/24	ERR	Review insurance issues for hearing in bankruptcy regarding 2004 information requests to insurers.	0.80	\$780.00
04/26/24	ERR	Revise statement following meet and confer regarding disclosures.	0.30	\$292.50
04/26/24	JCH	File Statement of Compliance in district court case related to deadline listed in Pretrial Order.	0.50	\$150.00
04/26/24	KRD	Review excess insurers' motion to dismiss filings in the district court case.	0.30	\$205.50
04/26/24	SJM	Finalize statement regarding meet and confer compliance (.3); call with M. Roberts and E. Mazzocco regarding adversary proceeding status and strategy in light of restructuring goals (1.3); review requirements of service of filings in adversary proceeding (.7).	2.30	\$1,725.00
04/28/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	5.30	\$3,339.00

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04/29/24	AMUE	Meeting with E. Ridley and M. Lee to discuss privileged issue concerning insurance and mediation in order to provide advice to client regarding same (1.5); review three emails received from A. Walter regarding sealing motion (.5) and respond to same (.4); review status of tender of claims based on production of proofs of claim (.4).	2.80	\$2,590.00
04/29/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.10	\$693.00
04/29/24	ERR	Review status of proof of claim supplemental tenders and issues related to potential mediation positions regarding insurance for RCBO.	1.50	\$1,462.50
04/29/24	ERR	Review basis for various demands to insurers.	0.60	\$585.00
04/29/24	ERR	Review proposed motion to seal and stipulation.	0.40	\$390.00
04/29/24	MDL	Telephone conference with A. Uetz and E. Ridley regarding privileged case matters.	1.10	\$880.00
04/29/24	SJM	Review request from Pacific to stipulation to partial sealing exhibit to motion to dismiss (.5); respond regarding draft stipulation and proposed order (.6).	1.10	\$825.00
04/30/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	0.40	\$252.00
Task Total:			189.50	\$139,884.50

032 Rule 2004 Motions/Discovery/Subpoenas

04/01/24	EPK	Develop strategy relating to third-party subpoenas sent to depository bank.	0.20	\$160.00
04/01/24	KAFA	Analysis of additional diligence items received in Box from client and A&M.	0.50	\$197.50
04/01/24	RTST	Work on producing documents to the insurers.	2.90	\$2,146.00
04/02/24	EPK	Email correspondence with P. Bongiovanni and M. Lee regarding third-party subpoena served on depository bank.	0.20	\$160.00
04/02/24	MDL	Correspondence with P. Bongiovanni regarding US Bank subpoena.	0.20	\$160.00

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04/03/24	KAFA	Analysis of additional diligence items received in Box from client and VeraCruz.	0.50	\$197.50
04/09/24	MDL	Analyze RCC production documents.	0.20	\$160.00
04/09/24	MDL	Email exchange with R. Manns regarding confidentiality issue on RCC production documents.	0.20	\$160.00
04/10/24	MDL	Evaluate real estate valuation documentation.	0.20	\$160.00
04/10/24	MDL	Analyze insurers' discovery motions up for hearing on 4/26.	0.30	\$240.00
04/10/24	SJM	Telephone call with M. Lee regarding preparation for hearing on discovery motions.	0.30	\$225.00
04/11/24	MDL	Evaluate BRG's recent document requests.	0.20	\$160.00
04/12/24	KAFA	Analysis of additional client documents loaded into Box and prepare for production to Committee.	1.70	\$671.50
04/12/24	MDL	Evaluate status of document production and satisfaction of recent Committee document requests.	0.70	\$560.00
04/12/24	MDL	Final-level review of documents to be produced to Committee.	0.20	\$160.00
04/17/24	KAFA	Analysis of additional client documents loaded into Box.	0.50	\$197.50
04/18/24	MDL	Email correspondence with VeraCruz (D. Flanagan, C. de Quesada) regarding document diligence issues.	0.10	\$80.00
04/19/24	MDL	Telephone conference with C. Restel regarding possible outcomes of discovery motions.	0.30	\$240.00
04/19/24	MDL	Telephone conference with BRG, VeraCruz, and A&M personnel regarding document diligence protocols (only joined part of call).	0.30	\$240.00
04/19/24	MDL	Telephone conference with C. de Quesada and D. Flanagan (VeraCruz) and S. Levitt (A&M) regarding diligence review and advice on weekly discussions with BRG.	0.50	\$400.00

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04/22/24	EPK	Email correspondence with A. Uetz regarding CTN document production and confidentiality protocols (.2); review CTN document-production protocol (.1); review new informal document requests from the Committee relating to CTN (.1).	0.40	\$320.00
04/22/24	EPK	Brief review of master Committee diligence request tracker provided by D. Flanagan of VeraCruz.	0.20	\$160.00
04/22/24	MDL	Analyze most recent Committee diligence requests regarding CTN and other estate interests.	0.40	\$320.00
04/23/24	EPK	Address issues relating to the Committee's informal document/information requests relating to RCBO's interest in CTN.	0.30	\$240.00
04/23/24	MDL	Analyze briefing on discovery motions in advance of status conference on same.	0.80	\$640.00
04/25/24	EPK	Review informal document requests from the Committee regarding CTN relationship (.2); review production protocol for same (.2); evaluate strategic issues relating to ongoing CTN-related requests (.2).	0.60	\$480.00
04/25/24	KAFA	Analysis of additional diligence documents requested by the Committee for production (1.2); attend diligence status call with D. Flanagan, C. de Quesada, A. Bardos, M. Lee and S. Moses (.7).	1.90	\$750.50
04/25/24	MDL	Email correspondence with K. Farrar and M. Schachte (Foley) regarding production of RCC documents through RCBO.	0.10	\$80.00
04/25/24	MDL	Email exchange with D. Flanagan (VeraCruz) regarding BRG diligence requests and responses thereto.	0.40	\$320.00
04/25/24	MDL	Email correspondence with R. Manns (Norton Rose Fulbright) regarding production of documents collected by RCC.	0.10	\$80.00
04/25/24	MDL	Telephone conference with VeraCruz (D. Flanagan, C. de Quesada) regarding questions on document production and OCP retention status.	0.70	\$560.00
04/25/24	MDL	Email exchange with K. Farrar regarding direction on documents to be produced to Committee and confidentiality designations for same.	0.30	\$240.00

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04/25/24	MDL	Analyze RCC production documents and confidentiality designations on same.	0.10	\$80.00
04/25/24	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) regarding RCC production documents.	0.40	\$320.00
04/25/24	MDL	Telephone conference with K. Farrar regarding additional documents to be produced to Committee.	0.40	\$320.00
04/25/24	SJM	Prepare for (.3); and participate in diligence status call with M. Lee, D. Flanagan, C. de Quesada, and A. Bardos (.7).	1.00	\$750.00
04/26/24	EPK	Prepare summary of updated CTN document-production protocol (.4); email to B. Weisenberg of Lowenstein regarding CTN document-production requests and summary of protocol for same (.4).	0.80	\$640.00
04/26/24	KAFA	Analysis of additional client documents loaded into Box and prepare for production to Committee.	2.10	\$829.50
04/26/24	MDL	Email correspondence with Committee counsel (Lowenstein) regarding RCC documents to be produced and other explanatory points regarding today's document production.	0.20	\$160.00
04/26/24	MDL	Provide instruction to K. Farrar and M. Schachte (both of Foley) regarding latest document production to Committee.	0.30	\$240.00
04/30/24	KAFA	Analysis of additional client documents to prepare for production to Committee.	0.50	\$197.50
		Task Total:	22.20	\$14,402.50

038 Mediation

04/01/24	AMUE	Email communication to and from Judge Sontchi regarding privileged mediation issue.	0.50	\$462.50
04/01/24	AMUE	Review privileged issue raised by mediation discussions as requested by client.	1.40	\$1,295.00

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04/01/24	EPK	Ongoing analysis of privileged issues related to each Non-Debtor Catholic Entity to prepare summaries of same for mediation process.	0.60	\$480.00
04/01/24	MCM	Review email correspondence regarding mediator requests for information.	0.30	\$247.50
04/01/24	MRL	Confer with M. Moore regarding further research on privileged matter regarding California statute.	0.20	\$114.00
04/02/24	AMUE	Analyze privileged mediation issue for client.	1.40	\$1,295.00
04/02/24	MCM	Conference call with A. Uetz to discuss Committee mediation proposal and related issues (.5); email memorandum to same regarding analysis of issues (.6).	1.10	\$907.50
04/02/24	MDL	Evaluate estate assets and strategy for deployment of same in mediation.	0.30	\$240.00
04/02/24	MRL	Research privileged matter regarding California statute.	2.50	\$1,425.00
04/03/24	AMUE	Meeting with Judge Sontchi regarding mediation (.5); review issue concerning insurance (.9); draft privileged memorandum to client regarding mediation (1.3).	2.70	\$2,497.50
04/03/24	AMUE	Review privileged issue concerning Non-Debtor Catholic Entities in order to provide advice to client regarding same.	1.20	\$1,110.00
04/03/24	EPK	Further review of corporate formation and structure documents to prepare summaries of same for mediation process.	0.70	\$560.00
04/03/24	MCM	Email correspondence regarding mediation issues and analysis of same.	0.40	\$330.00
04/03/24	MDL	Strategize regarding Committee mediation proposal.	0.40	\$320.00
04/03/24	MRL	Confer with M. Moore regarding status of privileged matter regarding California statute (.2); research privileged matter regarding California statute (.9).	1.10	\$627.00
04/04/24	MCM	Analyze case law on privileged matter regarding California statute and related matters prior to mediation.	1.20	\$990.00

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04/04/24	MDL	Email exchange with M. Kemner regarding mediation.	0.20	\$160.00
04/04/24	MRL	Analyze cases related to privileged matter regarding California statute.	1.70	\$969.00
04/05/24	MCM	Confer with M. Rofaail regarding outstanding research and analysis prior to mediation scheduled for April 15 and 16 in San Francisco, California.	0.50	\$412.50
04/05/24	MRL	Confer with M. Moore regarding privileged matter regarding California statute (.1); research case law regarding same (2.2).	2.30	\$1,311.00
04/05/24	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$456.00
04/06/24	MCM	Analyze case law from M. Rofaail in response to question about privileged matter regarding California statute.	0.30	\$247.50
04/06/24	MRL	Continue to research privileged matter regarding California statute (1.0); draft email to M. Moore regarding the research (.5).	1.50	\$855.00
04/07/24	MCM	Attention to strategy questions in advance of April mediation scheduled for 4/15 and 4/16 in San Francisco.	1.00	\$825.00
04/08/24	MCM	Email correspondence regarding mediation scheduled for April 15 and 16 in San Francisco, California.	0.40	\$330.00
04/09/24	MCM	Prepare for conference call with A. Uetz and M. Lee on April 10, 2024 prior to mediation scheduled for April 15 and 16 in San Francisco.	1.00	\$825.00
04/09/24	MDL	Telephone conference with J. Blease regarding mediation.	0.40	\$320.00
04/10/24	AMUE	Communication with C. Moore in preparation for mediation.	0.50	\$462.50
04/10/24	AMUE	Meeting with M. Lee and M. Moore to prepare for next mediation session (.7); telephone meeting with B. Weisenberg regarding mediation (.8); communication with Judge Sontchi regarding mediation (.3); draft privileged memorandum in preparation for next mediation session (1.8).	3.60	\$3,330.00

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04/10/24	EPK	Email correspondence with A. Uetz regarding status of privileged issue for mediation (.2); draft bankruptcy-related arguments regarding privileged matter concerning Non-Debtor Catholic Entity (2.5); send privileged issue analysis to A. Uetz and M. Lee (.2).	2.90	\$2,320.00
04/10/24	MCM	Finalize claims-analysis presentation (.8); prepare for mediation (.5).	1.30	\$1,072.50
04/10/24	MDL	Telephone conference with A. Uetz and M. Moore regarding topics for presentation and discussion at next mediation session.	0.90	\$720.00
04/10/24	MDL	Telephone conference with A. Uetz regarding information to share with mediator in advance of next mediation session.	0.20	\$160.00
04/11/24	AMUE	Draft summary for client regarding privileged mediation issue (1.1); review privileged documents concerning assets and various non-debtor entities in preparation for mediation (2.2); communication with J. Sontchi regarding mediation (.4); meeting with C. Moore in preparation for mediation (.5); email correspondence with C. Moore in preparation for mediation (.3).	4.50	\$4,162.50
04/11/24	MCM	Prepare for mediation scheduled for April 15 and 16 in San Francisco.	0.50	\$412.50
04/11/24	MDL	Revise analysis regarding Committee's assertion regarding cost-benefit of different litigation options.	0.40	\$320.00
04/12/24	AMUE	Meeting with Judge Sontchi to prepare for mediation (.5); call with Judge Sontchi regarding mediation (.2); email to J. Prol regarding mediation (.3); meeting with client team and M. Lee regarding real estate (1.0); meeting with P. Pascuzzi regarding case update (.5); prepare for mediation (3.2).	5.70	\$5,272.50
04/12/24	ERR	Review issues related to insurance.	0.60	\$585.00
04/12/24	JCH	Prepare documents related to mediation for upcoming sessions.	0.80	\$240.00

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04/12/24	MCM	Prepare for mediation, including review of documents to be produced to Committee and attention to issues concerning same.	1.20	\$990.00
04/12/24	MDL	Strategize regarding documents and information to be shared with Committee in preparation for upcoming mediation session.	0.40	\$320.00
04/12/24	SJM	Review schedules and SOFA regarding real property held for the benefit of parish churches.	0.30	\$225.00
04/13/24	MCM	Confer with Foley team regarding mediation and strategy for same.	0.60	\$495.00
04/13/24	MDL	Strategize for 4/15 and 4/16 mediation sessions.	0.30	\$240.00
04/14/24	AMUE	Prepare for mediation by review of privileged client communications (1.8); outline notes for mediation (1.4).	3.20	\$2,960.00
04/14/24	ERR	Review issues related to insurance.	0.70	\$682.50
04/15/24	AMUE	Prepare for mediation (.2) Attend mediation with Committee (8.0).	8.20	\$7,585.00
04/15/24	AMUE	Meeting with E. Ridley, M. Moore and M. Lee regarding mediation strategy.	1.50	\$1,387.50
04/15/24	ERR	Review issues related to insurance coverage.	1.50	\$1,462.50
04/15/24	ERR	Attend mediation session (partial).	1.00	\$975.00
04/15/24	JCH	Search court records for copy of Complaint filed by a subsidiary of Chubb Insurance against the Diocese of Trenton.	0.60	\$180.00
04/15/24	MCM	Mediation with Committee in San Francisco (8.0); debrief and strategy meeting with Foley team to discuss open issues following meetings with Committee and plan for second day of mediation (1.5).	9.50	\$7,837.50
04/15/24	MDL	Prepare for (.4) and participate in mediation session with Judge Sontchi, on behalf of the Debtor (8.0).	8.40	\$6,720.00
04/16/24	AMUE	Attend mediation session with client (6.0 - partial); prepare for mediation session (1.8).	7.80	\$7,215.00
04/16/24	MCM	Prepare for mediation (1.2); mediation with Committee in San Francisco (6.8).	8.00	\$6,600.00

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04/16/24	MDL	Participate in mediation session with Judge Sontchi.	6.70	\$5,360.00
04/17/24	AMUE	Draft privileged summary of mediation status following two days of mediation (1.5); strategize regarding mediation negotiations in order to provide advice to client regarding open issues (2.3).	3.80	\$3,515.00
04/17/24	ERR	Review insurance issues.	0.50	\$487.50
04/17/24	MDL	Strategize regarding Committee proposal from 4/15-4/16 mediation session.	0.70	\$560.00
04/18/24	MCM	Follow-up work following mediation with Committee in San Francisco (1.0); prepare for May mediations in Chicago (1.0).	2.00	\$1,650.00
04/19/24	AMUE	Privileged communications with M. Kemner and P. Bongiovanni regarding mediation strategy (1.9); outline advice for client regarding next steps in mediation (1.7).	3.60	\$3,330.00
04/19/24	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$570.00
04/22/24	AMUE	Review information related to claims analysis.	0.50	\$462.50
04/22/24	MCM	Draft analysis concerning claims based on additional information and analysis post-mediation.	0.60	\$495.00
04/22/24	MDL	Revise summary of mediation to client leadership.	0.30	\$240.00
04/23/24	MCM	Continue working on analysis regarding additional claims information (1.0); finalize proposed response and send to A. Uetz for review (.4).	1.40	\$1,155.00
04/24/24	MCM	Review questions from A. Uetz regarding claims (.4); finalize additional claims information and other issues and recirculate to A. Uetz for review (.8).	1.20	\$990.00
04/25/24	AMUE	Prepare response to email received from Judge Sontchi.	0.50	\$462.50
04/26/24	MCM	Email correspondence with Committee professionals and Foley team regarding follow-up to Committee claims inquiries and related issues.	0.50	\$412.50

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04/27/24	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$570.00
04/29/24	AMUE	Outline matters which require attention for next mediation session.	1.30	\$1,202.50
04/29/24	MDL	Analyze Committee's proposed stipulation on Church assets.	0.30	\$240.00
04/30/24	AMUE	Draft privileged memorandum to Bishop Barber and client leadership regarding mediation issues and strategy for same.	1.50	\$1,387.50
04/30/24	MCM	Telephone conference with A. Uetz regarding mediation planning and related issues.	0.50	\$412.50
Task Total:			129.10	\$108,047.00
Services Total:			589.90	\$444,798.00

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Dania Abbasi	DAAB	Associate	52.20	\$630.00	\$32,886.00
Elizabeth P. Mazzocco	EPM	Associate	3.40	\$750.00	\$2,550.00
Jose A. Lazaro	JAL	Associate	7.60	\$600.00	\$4,560.00
Joseph S. Harper	JSH	Associate	2.90	\$700.00	\$2,030.00
Kirsten R. Dedrickson	KRD	Associate	0.80	\$685.00	\$548.00
Mason Roberts	MR	Associate	16.70	\$690.00	\$11,523.00
Mary Rofaeil	MRL	Associate	56.20	\$570.00	\$32,034.00
Shane J. Moses	SJM	Of Counsel	54.50	\$750.00	\$40,875.00
Janelle C. Harrison	JCH	Paralegal	28.20	\$300.00	\$8,460.00
Kerry A. Farrar	KAFA	Paralegal	13.00	\$395.00	\$5,135.00
Ann Marie Uetz	AMUE	Partner	87.60	\$925.00	\$81,030.00
Emil P. Khatchaturian	EPK	Partner	37.20	\$800.00	\$29,760.00
Eileen R. Ridley	ERR	Partner	20.50	\$975.00	\$19,987.50
Jason J. Kohout	JJK	Partner	0.40	\$875.00	\$350.00
Jeff R. Blease	JRBL	Partner	12.50	\$1,275.00	\$15,937.50
Mark C. Moore	MCM	Partner	85.50	\$825.00	\$70,537.50
Matthew D. Lee	MDL	Partner	76.00	\$800.00	\$60,800.00
Alan R. Ouellette	AROU	Senior Counsel	0.90	\$800.00	\$720.00
Matthew S. Kiel	MSK	Senior Counsel	4.00	\$775.00	\$3,100.00

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Robert T. Stewart	RTST	Senior Counsel	14.30	\$740.00	\$10,582.00
Tamar N. Dolcourt	TND	Special Counsel	15.50	\$735.00	\$11,392.50
Totals			589.90		\$444,798.00

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$2,746.19
LSS - eDiscovery Services	\$3,600.00
Meals	\$1,512.51
Other Fees	\$1,312.00
Shipping Charges	\$63.91
Expenses Incurred Total	\$9,234.61

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

Expense Detail

Electronic Legal Research Services

Date	Initials	Description	Amount
04/30/24	SJM	DOCKET REPORT. ASSOCIATED CASES. Westlaw. US CASES DOC ACCESS. US PRACTICE GUIDES DOC ACCESS. SEARCH ACCESS CHARGE. US TREATISES DOC ACCESS.	\$2,746.19

IMAGE17-0.

LSS - eDiscovery Services

Date	Initials	Description	Amount
04/30/24	JRBL	LSS - eDiscovery Services.	\$3,600.00

Meals

Date	Initials	Description	Amount
03/12/24	ASD	Lunch--VENDOR: U.S. BANK 03/12/24 Lunch for RCBO mediation - - Ann Marie Uetz.	\$523.22
03/15/24	ASD	Breakfast--VENDOR: U.S. BANK 03/15/24 Breakfast for RCBO meeting - - Ann Marie Uetz.	\$295.57
03/15/24	ASD	Lunch--VENDOR: U.S. BANK 03/15/24 Lunch for RCBO meeting - - Ann Marie Uetz.	\$364.74
03/18/24	ASD	Breakfast--VENDOR: U.S. BANK 03/18/24 Breakfast for RCBO meeting - - Ann Marie Uetz.	\$328.98
			\$1,512.51

Other Fees

Date	Initials	Description	Amount
04/30/24	JRBL	Certificate of Good Standing--VENDOR: U.S. BANK 03/12/24 Pro Hac Vice filing fees. I filed one in each case for Ann Marie Uetz and also for Matt Lee, so there were 4 total. District Court Case Nos. 3:24-cv-00711 and 3:24-cv-00709. -.	\$1,312.00

Shipping Charges

Date	Initials	Description	Amount
04/30/24	AMUE	Federal Express Invoice: 847230276; Tracking: 273354486680; Sender: Ann Marie Uetz; Recipient: Ann Marie Uetz Foley & Lardner LLP 555 CALIFORNIA ST STE 1700 SAN FRANCISCO CA 94104 US; Comment: Confidential information.	\$63.91

Expense Total: \$9,234.61