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*Counsel for the Official Committee of Unsecured Creditors*

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

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

Case No. 23-40523 WJL

Chapter 11

**MONTHLY PROFESSIONAL FEE  
 STATEMENT FOR BURNS BAIR LLP  
 [JULY 2024]**

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



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

8 <b>Period</b>	<b>Fees</b>	<b>Expenses</b>	<b>Total</b>
9           July 1, 2024 through July 31, 2024	\$109,814.00	\$3,308.80	\$113,122.80
10           Net Total Allowed Payments this Statement 11           Period: (80% of Fees and 100% of Costs)	\$87,851.20	\$3,308.80	\$91,160.00

12  
13           The itemized billing statement for the fees and costs billed is attached hereto as **Exhibit**  
14 **A**. Notice Parties have ten (10) days from the date of service of this Monthly Fee Statement to  
15 file an objection thereto. If no objection is filed, Burns Bair may file a certificate of no objection  
16 (or if an Objection was timely served, a certificate of partial objection) with the Court after which  
17 the Debtor, without further order of the Court, shall pay Burns Bair an amount equal to the lesser  
18 of: (1) 80% of the fees and 100% of the expenses requested in the Monthly Fee Statement, and  
19 (2) if an Objection was served, 80% of the fees and 100% of the expenses to which there was no  
20 Objection no later than five (5) business days after the filing of the relevant certificate.

21 Dated: August 30, 2024

**BURNS BAIR LLP**

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

26  
27  
28 <sup>1</sup> Capitalized terms not otherwise defined shall have the meaning ascribed to them in the Interim Fee Order.

# **Exhibit A**

# Burns | Bair

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

**The Roman Catholic Bishop of Oakland UCC**

**Issue Date :** 8/29/2024

**Bill # :** 01511

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/25/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes (.6);	0.60	\$672.00
7/26/2024	Timothy Burns	Prepare for Committee meeting (.1); participate in Committee meeting for insurance purposes (.8); participate in call with J. Bair re outcome of Committee meeting and next-steps (.1);	1.00	\$1,120.00
<b>Totals for Committee Meetings</b>			<b>1.60</b>	<b>\$1,792.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/3/2024	Jesse Bair	Review stipulation continuing hearing on next round of interim fee applications (.1);	0.10	\$90.00
7/25/2024	Jesse Bair	Review the fee examiner's interim report re Burns Bair's second interim fee application (.2);	0.20	\$180.00
7/25/2024	Jesse Bair	Draft response to the fee examiner's questions re Burns Bair's second interim fee application (.5);	0.50	\$450.00
7/28/2024	Jesse Bair	Review Burns Bair invoice for privilege and confidential information (.9);	0.90	\$810.00
7/28/2024	Jesse Bair	Correspond with B. Horn-Edwards re preparing Burns Bair monthly fee submission (.1);	0.10	\$90.00
7/29/2024	Jesse Bair	Review and edit Burns Bair monthly fee statement (.1); correspond with C. Mitsuoka re same (.1);	0.20	\$180.00
7/29/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
<b>Totals for Fee Applications</b>			<b>2.30</b>	<b>\$1,902.00</b>

## Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/11/2024	Timothy Burns	Participate in motion to dismiss hearing in the insurance district court action, case management conference, and post-hearing meet and confer with the insurers and debtor, as ordered by the court (4.5);	4.50	\$5,040.00
<b>Totals for Hearings</b>			<b>4.50</b>	<b>\$5,040.00</b>

## Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/1/2024	Nathan Kuenzi	Draft revised demand letter to AIG and send all draft demand letters to J. Bair (.3);	0.30	\$165.00
7/1/2024	Jesse Bair	Correspond with N. Kuenzi re revised insurance demand letters (.1);	0.10	\$90.00
7/2/2024	Timothy Burns	Review US Fire's response to the debtor's demand letter (.2);	0.20	\$224.00
7/2/2024	Jesse Bair	Review and edit draft case management statement to incorporate Intervenor's positions, including incorporation of suggested edits from J. Prol and T. Burns (1.4);	1.40	\$1,260.00
7/2/2024	Jesse Bair	Prepare for meeting with the debtor re various case insurance issues (.1); review and respond to correspondence with the debtor re same (.1); participate in meeting with the debtor and T. Burns re various case insurance issues (.2);	0.40	\$360.00
7/2/2024	Timothy Burns	Participate in meeting with the debtor and J. Bair re various case insurance issues (.2);	0.20	\$224.00
7/2/2024	Nathan Kuenzi	Draft revised version of the Committee's insurance demand letters, including incorporation of suggested changes from J. Bair (1.8);	1.80	\$990.00
7/2/2024	Nathan Kuenzi	Participate in conference with J. Bair re revisions needed to the Committee's insurance demand letters (.2);	0.20	\$110.00
7/2/2024	Timothy Burns	Review LMI's response to the debtor's demand letter (.2);	0.20	\$224.00
7/2/2024	Jesse Bair	Review current drafts of the Committee's demand letters to the insurers (.2); provide instructions to N. Kuenzi re additional edits and revisions needed to same (.2);	0.40	\$360.00

7/2/2024	Timothy Burns	Review and respond to correspondence with J. Prol re meet and confer with the insurers re joint case management statement (.1); review and respond to correspondence with the debtor and J. Bair re the insurers' responses to the Debtor's insurance demands (.1); participate in conference with J. Bair re same (.1);	0.30	\$336.00
7/2/2024	Timothy Burns	Review and respond to correspondence with Lowenstein and J. Bair re the parties' joint case management statement (.2);	0.20	\$224.00
7/2/2024	Timothy Burns	Review CNA's response to the debtor's demand letter (.3);	0.30	\$336.00
7/2/2024	Timothy Burns	Review and revise draft case management statement in the insurance adversary proceeding (.9);	0.90	\$1,008.00
7/2/2024	Jesse Bair	Review Madison Boys and Girls Club Plan of Reorganization for potential impact on insurance treatment for RCBO Plan (.6);	0.60	\$540.00
7/2/2024	Jesse Bair	Brief review re certain insurers' responses to the debtor's demand letters (.3); participate in conference with T. Burns re same (.1);	0.40	\$360.00
7/2/2024	Timothy Burns	Prepare for meet and confer with the insurers (.2); participate in meet and confer with the insurers and debtor re joint case management statement in the insurance adversary proceeding (.3); participate in post-call with J. Bair re next steps (.1);	0.60	\$672.00
7/2/2024	Jesse Bair	Participate in meet and confer with the insurers and the debtor re the joint case management statement (.3); participate in post-meeting call with T. Burns re outcome of same and next-steps (.1);	0.40	\$360.00
7/3/2024	Nathan Kuenzi	Participate in conference with J. Bair re drafting the Committee's insurance mediation statement (.3);	0.30	\$165.00
7/3/2024	Nathan Kuenzi	Brief review of continuous trigger of coverage research in connection with the Committee's insurance mediation statement (.2);	0.20	\$110.00
7/3/2024	Timothy Burns	Analyze materials re structure of recent multiple claimant plans in connection with potential Plan structure for RCBO (1.5);	1.50	\$1,680.00

7/3/2024	Jesse Bair	Review the debtor's and insurers' further revisions to the joint case management statement (.2); review and respond to correspondence with the debtor, Lowenstein, and T. Burns re same and finalization of the Committee's statements (.2); participate in call with T. Burns re same (.1); review final version of case management statement (.1);	0.60	\$540.00
7/3/2024	Timothy Burns	Participate in call with the debtor re finalization of the joint case management statement (.2); participate in call with J. Bair re same (.1); review correspondence with the insurers, Debtor, and Committee professionals re revisions to case management statement (.1); review final version of the insurance case management statement (.1);	0.50	\$560.00
7/3/2024	Jesse Bair	Provide instructions to N. Kuenzi re drafting the Committee's insurance mediation statement (.3);	0.30	\$270.00
7/3/2024	Jesse Bair	Revise, edit, finalize, and serve the Committee's insurance demand letters (1.4);	1.40	\$1,260.00
7/5/2024	Timothy Burns	Review correspondence with LMI and C. Restel re LMI's motion for stay pending appeal and related draft stipulation (.1);	0.10	\$112.00
7/5/2024	Jesse Bair	Review LMI correspondence re continuation of hearing re LMI's Rule 2004 appeal (.1);	0.10	\$90.00
7/5/2024	Timothy Burns	Begin preparing for motion to dismiss hearing in the insurance adversary proceeding (.6);	0.60	\$672.00
7/7/2024	Nathan Kuenzi	Analyze and identify key cases and other materials for review by T. Burns in preparation for upcoming insurance motion to dismiss hearing (2.3);	2.30	\$1,265.00
7/8/2024	Jesse Bair	Provide instructions to N. Kuenzi re preparations needed for upcoming motion to dismiss hearing (.1); participate in conference with T. Burns re preparations and strategy in connection with same (.1);	0.20	\$180.00
7/8/2024	Timothy Burns	Review and respond to correspondence with G. Albert re upcoming motion to dismiss hearing (.1);	0.10	\$112.00
7/8/2024	Timothy Burns	Participate in conference with J. Bair re preparations and strategy for insurance motion to dismiss hearing (.1); participate in conference with N. Kuenzi re preparations needed in advance of same (.1);	0.20	\$224.00

7/8/2024	Nathan Kuenzi	Participate in conference with T. Burns re preparations for the insurance motion to dismiss hearing (.1); correspond with T. Burns re final versions of the Committee insurance demand letters (.1);	0.20	\$110.00
7/8/2024	Nathan Kuenzi	Review the joint case management statement in the district court insurance action (.4);	0.40	\$220.00
7/9/2024	Nathan Kuenzi	Participate in conference with T. Burns re the Committee's insurance mediation statement (.1);	0.10	\$55.00
7/9/2024	Timothy Burns	Review and respond to correspondence with J. Prol re insurance motion to dismiss hearing (.1);	0.10	\$112.00
7/9/2024	Timothy Burns	Prepare for motion to dismiss hearing, including reviewing briefing and April adversary proceeding transcript (.8);	0.80	\$896.00
7/9/2024	Nathan Kuenzi	Finish analyzing and identifying key cases and other materials for review by T. Burns in preparation for upcoming insurance motion to dismiss hearing (.6);	0.60	\$330.00
7/9/2024	Jesse Bair	Review correspondence with J. Prol and T. Burns re upcoming motion to dismiss hearing (.1);	0.10	\$90.00
7/9/2024	Timothy Burns	Prepare memo to file re June 18 mediation session re insurance and follow-up requests from mediators (.4); meet with N. Kuenzi re mediation statement (.1);	0.50	\$560.00
7/9/2024	Timothy Burns	Review LMI's limited objection re retention of insurance archeologist (.2); review correspondence with B. Weisenberg and call B. Weisenberg re same (.1);	0.30	\$336.00
7/10/2024	Jesse Bair	Review correspondence with B. Wiesenberg, state court counsel, and the Committee re recent case developments and next-steps (.1);	0.10	\$90.00
7/10/2024	Nathan Kuenzi	Analyze issues relating to insurance joinder and draft email memo summarizing same for T. Burns (.8);	0.80	\$440.00
7/10/2024	Timothy Burns	Continue preparing for insurance motion to dismiss hearing (1.1); participate in conference with debtor's counsel re same (.2); correspond with J. Prol re same (.1);	1.40	\$1,568.00
7/11/2024	Jesse Bair	Review Chubb's preliminary response and information request to the Committee's insurance demand and correspond with B. Wiesenberg re same (.1);	0.10	\$90.00
7/11/2024	Timothy Burns	Participate in conference with J. Prol re strategy for insurance motion to dismiss hearing and case management conference (1.3);	1.30	\$1,456.00



7/11/2024	Nathan Kuenzi	Begin drafting Committee insurance mediation statement (.4);	0.40	\$220.00
7/11/2024	Timothy Burns	Participate in meeting with state court counsel re outcome of the insurance motion to dismiss hearing, case management conference, and next-steps re same (.6);	0.60	\$672.00
7/11/2024	Timothy Burns	Finish preparing for insurance motion to dismiss hearing and case management conference (3.9);	3.90	\$4,368.00
7/11/2024	Jesse Bair	Review correspondence from state court counsel re outcome of motion to dismiss hearing in the insurance adversary proceeding (.1);	0.10	\$90.00
7/12/2024	Nathan Kuenzi	Draft outline of the Committee's proposed Fourth Amended Complaint (1.3);	1.30	\$715.00
7/12/2024	Nathan Kuenzi	Begin analyzing insurer reservation of rights letters to identify all coverage defenses raised by the insurers in connection with fourth amended complaint (2.0);	2.00	\$1,100.00
7/12/2024	Karen DempSKI	Docket and calendar deadlines from case management conference (.2);	0.20	\$68.00
7/12/2024	Nathan Kuenzi	Draft email memo to T. Burns summarizing proposed outline framework for Fourth Amended Complaint (.3);	0.30	\$165.00
7/12/2024	Nathan Kuenzi	Review T. Burns correspondence re projects in connection with drafting Fourth Amended Complaint (.2);	0.20	\$110.00
7/12/2024	Jesse Bair	Correspond with N. Kuenzi re the Committee's insurance mediation statement (.1);	0.10	\$90.00
7/12/2024	Jesse Bair	Review civil minutes of the motion to dismiss hearing and Pre-Trial Order No. 2 (.1);	0.10	\$90.00
7/12/2024	Jesse Bair	Review T. Burns email re outcome of motion to dismiss hearing and related correspondence with BB and T. Burns re preparing amended complaint in light of same (.1);	0.10	\$90.00
7/12/2024	Timothy Burns	Analyze potential structure and strategy re Fourth Amended Complaint (.4); draft email memo to BB team summarizing same and related projects (.4);	0.80	\$896.00
7/12/2024	Nathan Kuenzi	Continue drafting the Committee's insurance mediation statement (3.5);	3.50	\$1,925.00
7/12/2024	Alexander Castro	Draft detailed summary of all defenses to coverage raised by the insurers to date for use in connection with Fourth Amended Complaint (6.7);	6.70	\$3,149.00
7/12/2024	Timothy Burns	Review letter from Chubb re request for information (.1);	0.10	\$112.00

7/13/2024	Jesse Bair	Review LMI's objection to the debtor's proposed retention of an insurance archaeologist, including related correspondence with Lowenstein re same (.2);	0.20	\$180.00
7/13/2024	Nathan Kuenzi	Continue drafting the Committee's insurance mediation statement, with particular focus on each insurer's individual exposure and claim count (4.1);	4.10	\$2,255.00
7/13/2024	Jesse Bair	Review B. Wiesenberg correspondence re mini-fact sheets and Chubb's request for production of same (.1);	0.10	\$90.00
7/14/2024	Nathan Kuenzi	Finish drafting the Committee's insurance mediation statement (4.9);	4.90	\$2,695.00
7/15/2024	Alexander Castro	Begin drafting the Committee's proposed Fourth Amended Complaint (2.6);	2.60	\$1,222.00
7/15/2024	Nathan Kuenzi	Participate in BB team conference re case developments and ongoing insurance projects (.4);	0.40	\$220.00
7/15/2024	Jesse Bair	Participate in BB team conference re case developments and ongoing projects, with particular focus on outcome of motion to dismiss hearing and preparing amended complaint in light of same (.4);	0.40	\$360.00
7/15/2024	Timothy Burns	Participate in BB team conference re case status, strategy, and related case projects (.4);	0.40	\$448.00
7/15/2024	Nathan Kuenzi	Detailed review of A. Castro summary re all insurer reservation of rights and denial letters in connection with preparing Fourth Amended Complaint (1.0);	1.00	\$550.00
7/15/2024	Alexander Castro	Continue drafting summary of all reservation of rights and denial letters for use in connection with Fourth Amended Complaint (2.8);	2.80	\$1,316.00
7/15/2024	Jesse Bair	Participate in conference with T. Burns re outcome of motion to dismiss hearing and next-steps re amended complaint (.2);	0.20	\$180.00
7/15/2024	Jesse Bair	Revise and edit the Committee's insurance mediation statement (3.6);	3.60	\$3,240.00
7/16/2024	Alexander Castro	Continue drafting the Committee's proposed Fourth Amended Complaint (3.9);	3.90	\$1,833.00
7/16/2024	Timothy Burns	Review correspondence with Lowenstein and J. Bair re insurer request for claimant information (.2);	0.20	\$224.00
7/16/2024	Timothy Burns	Review A. Uetz correspondence re post-hearing meeting action-items (.1); correspond with internal BB team re follow up re same (.1);	0.20	\$224.00

7/16/2024	Nathan Kuenzi	Supplemental analysis of reservation of rights and denial letters for use in drafting various, specific causes of action against each insurer (2.4);	2.40	\$1,320.00
7/16/2024	Jesse Bair	Participate in additional conference with T. Burns re preparing amended complaint in light of recent motion to dismiss hearing outcome (.1);	0.10	\$90.00
7/16/2024	Timothy Burns	Review and respond to correspondence re debtor's clawback of inadvertently produced document (.2);	0.20	\$224.00
7/16/2024	Jesse Bair	Review and incorporate T. Burns' suggested edits into the Committee's insurance mediation statement (.3); case law research re California negligence law in connection with same (.1); correspond with Lowenstein re suggested edits to the mediation statement (.1);	0.50	\$450.00
7/16/2024	Jesse Bair	Finalize and serve the Committee's insurance mediation statement on the mediators (.2);	0.20	\$180.00
7/16/2024	Timothy Burns	Participate in call with J. Bair re insurer's request for particular claimant information (.1); review final version of Committee mediation statement (.1); participate in additional call with J. Bair re preparing fourth amended complaint (.1);	0.30	\$336.00
7/16/2024	Jesse Bair	Participate in conference with state court counsel re case insurance strategy and mediation issues (.2);	0.20	\$180.00
7/16/2024	Timothy Burns	Review and edit the Committee's insurance mediation statement, including brief legal research re same (1.4);	1.40	\$1,568.00
7/16/2024	Jesse Bair	Participate in conference with T. Burns re potential response to Chubb's letter requesting production of certain state court materials (.1);	0.10	\$90.00
7/16/2024	Nathan Kuenzi	Draft portions of the Committee's proposed Fourth Amended Complaint (2.3);	2.30	\$1,265.00
7/17/2024	Jesse Bair	Review debtor correspondence re insurance meet and confer and related action items (.1); correspond with N. Kuenzi re same and information needed from BB (.1);	0.20	\$180.00
7/17/2024	Alexander Castro	Continue drafting numerous, specific causes of action for each insurer as part of the Committee's proposed Fourth Amended Complaint (3.2);	3.20	\$1,504.00

7/17/2024	Timothy Burns	Review and respond to correspondence with B. Weisenberg and state court counsel re upcoming meeting, the insurance adversary proceeding, and the Committee's settlement demand letters (.2);	0.20	\$224.00
7/17/2024	Nathan Kuenzi	Continue drafting sections of the Committee's proposed Fourth Amended Complaint, with particular focus on tying specific causes of action against each insurer to particular coverage defenses raised in reservation of rights and/or coverage denial letters (3.5);	3.50	\$1,925.00
7/17/2024	Timothy Burns	Review and revise the Committee's response letter to Chubb (.1);	0.10	\$112.00
7/17/2024	Jesse Bair	Review transcript of September 23 Rule 2004 hearing in response to Chubb's request for the production of state court mini-fact sheets (.3);	0.30	\$270.00
7/17/2024	Nathan Kuenzi	Prepare claim count exhibits in response to the insurers' information requests (.6);	0.60	\$330.00
7/17/2024	Jesse Bair	Draft response to Chubb's letter requesting the production of certain state court mediation materials (.3); review and respond to correspondence with Lowenstein re same (.1);	0.40	\$360.00
7/18/2024	Alexander Castro	Continue drafting numerous, specific causes of action for each insurer as part of the Committee's proposed Fourth Amended Complaint (5.3);	5.30	\$2,491.00
7/18/2024	Jesse Bair	Answer N. Kuenzi questions re preparing fourth amended complaint (.1);	0.10	\$90.00
7/18/2024	Timothy Burns	Review and respond to J. Prol correspondence re follow-up from insurance motion to dismiss hearing (.2);	0.20	\$224.00
7/18/2024	Nathan Kuenzi	Continue drafting sections of the Committee's proposed Fourth Amended Complaint, with particular focus on tying specific causes of action against each insurer to particular coverage defenses raised in reservation of rights and/or coverage denial letters (3.3);	3.30	\$1,815.00
7/19/2024	Nathan Kuenzi	Analyze insurer Answers and research issues re parties and jurisdiction in connection with Fourth Amended Complaint (.8);	0.80	\$440.00
7/19/2024	Alexander Castro	Revise and edit the Committee's proposed Fourth Amended Complaint (3.6);	3.60	\$1,692.00
7/19/2024	Jesse Bair	Answer additional questions from N. Kuenzi re preparing fourth amended complaint (.1);	0.10	\$90.00

7/19/2024	Nathan Kuenzi	Complete drafting of initial version of the Committee's proposed Fourth Amended Complaint (6.9);	6.90	\$3,795.00
7/20/2024	Timothy Burns	Participate in call with state court counsel re Committee insurance strategy (.2);	0.20	\$224.00
7/21/2024	Nathan Kuenzi	Analyze revisions made by T. Burns to draft Fourth Amended Complaint and issues raised therein (.4);	0.40	\$220.00
7/21/2024	Timothy Burns	Review and revise draft Fourth Amended Complaint (.7);	0.70	\$784.00
7/22/2024	Jesse Bair	Review and respond to correspondence with N. Kuenzi re insurer coverage letters in connection with fourth amended complaint (.2); correspond with the debtor re same (.1);	0.30	\$270.00
7/22/2024	Nathan Kuenzi	Draft revised version of the Committee's proposed Fourth Amended Complaint to incorporate suggested edits received from T. Burns (5.5);	5.50	\$3,025.00
7/22/2024	Nathan Kuenzi	Analyze lost policy documents in light of insurer coverage letters to inform particular causes of actions and other allegations in Fourth Amended Complaint (2.4);	2.40	\$1,320.00
7/22/2024	Timothy Burns	Continue reviewing and revising particular sections of draft Fourth Amended Complaint (.4);	0.40	\$448.00
7/23/2024	Timothy Burns	Review and respond to correspondence with the Debtor and mediator re upcoming mediation sessions (.2);	0.20	\$224.00
7/23/2024	Timothy Burns	Review correspondence with the Debtor and J. Bair re amending pleadings (.1); review internal BB correspondence re same (.1);	0.20	\$224.00
7/23/2024	Nathan Kuenzi	Continue drafting revised version of the Committee's proposed Fourth Amended Complaint to incorporate suggested edits received from T. Burns (1.9);	1.90	\$1,045.00
7/23/2024	Timothy Burns	Review correspondence from LMI re claims reconciliation meeting (.1);	0.10	\$112.00
7/24/2024	Nathan Kuenzi	Make final revisions to Fourth Amended Complaint to incorporate supplemental edits received from T. Burns (2.8);	2.80	\$1,540.00
7/24/2024	Alexander Castro	Participate in conference with T. Burns re revising Fourth Amended Complaint (.2);	0.20	\$94.00
7/24/2024	Timothy Burns	Correspond with numerous insurers re requested claim count information in connection with the Committee's insurance demand letters (.4); met with N. Kuenzi re same (.1);	0.50	\$560.00

7/24/2024	Alexander Castro	Draft revised sections of Fourth Amended Complaint to incorporate suggested edits received from T. Burns (3.9);	3.90	\$1,833.00
7/24/2024	Jesse Bair	Answer N. Kuenzi questions re fourth amended complaint revisions (.1);	0.10	\$90.00
7/24/2024	Nathan Kuenzi	Participate in conference with T. Burns re finalizing Fourth Amended Complaint (.3);	0.30	\$165.00
7/24/2024	Nathan Kuenzi	Participate in additional conference with T. Burns re revising the Fourth Amended Complaint (.2);	0.20	\$110.00
7/24/2024	Nathan Kuenzi	Participate in conference with J. Bair re RCBO complaint issues (.1);	0.10	\$55.00
7/24/2024	Jesse Bair	Review correspondence with the debtor and Committee professionals re upcoming mediation sessions (.1);	0.10	\$90.00
7/24/2024	Timothy Burns	Participate in additional conference with N. Kuenzi and A. Castro re amendments to complaint (.2);	0.20	\$224.00
7/24/2024	Alexander Castro	Participate in conference with T. Burns and N. Kuenzi re Fourth Amended Complaint (.2);	0.20	\$94.00
7/24/2024	Timothy Burns	Review and respond to correspondence with the debtor re upcoming mediation sessions (.2);	0.20	\$224.00
7/24/2024	Timothy Burns	Revise, edit, and finalize the Committee's proposed Fourth Amended Complaint (3.1);	3.10	\$3,472.00
7/24/2024	Timothy Burns	Met with A. Castro re suggested revisions to pleading (.2); met with N. Kuenzi re assignment re same (.3);	0.50	\$560.00
7/25/2024	Jesse Bair	Review T. Burns correspondence with the insurers re requested claim information re Committee insurance demand letters (.1);	0.10	\$90.00
7/25/2024	Timothy Burns	Participate in conference with J. Bair re preparations for state court counsel meeting re case insurance developments (.2);	0.20	\$224.00
7/25/2024	Jesse Bair	Participate in conference with T. Burns re preparations for state court counsel meeting re case insurance developments (.2);	0.20	\$180.00
7/25/2024	Timothy Burns	Prepare for state court counsel meeting re case insurance developments (.6);	0.60	\$672.00
7/26/2024	Timothy Burns	Participate in call with state court counsel re mediator call (.1);	0.10	\$112.00
7/26/2024	Jesse Bair	Participate in conference with T. Burns re outcome of Committee meeting and next-steps re case insurance strategy (.1);	0.10	\$90.00
7/26/2024	Timothy Burns	Review excess insurance policy with A. Castro re drop-down issue (.3);	0.30	\$336.00



7/26/2024	Timothy Burns	Review correspondence from the debtor re amending complaint (.2); meet with J. Bair re same (.1);	0.30	\$336.00
7/26/2024	Alexander Castro	Research California case law and particular policy provisions re insurer drop-down issue (3.1);	3.10	\$1,457.00
7/26/2024	Timothy Burns	Review correspondence from the mediator re case mediation issues (.1);	0.10	\$112.00
7/26/2024	Timothy Burns	Participate in conference with B. Weisenberg re upcoming Committee meeting (.2);	0.20	\$224.00
7/26/2024	Nathan Kuenzi	Draft email memo summarizing discrepancies and overlap between debtor and Committee insurance claim count lists (1.0);	1.00	\$550.00
7/26/2024	Alexander Castro	Participate in conference with T. Burns re preliminary insurer drop-down analysis (.2);	0.20	\$94.00
7/26/2024	Timothy Burns	Conference with A. Castro re preliminary drop-down research findings (.2);	0.20	\$224.00
7/26/2024	Timothy Burns	Participate in call with the mediator and Lowenstein re case mediation issues (.6);	0.60	\$672.00
7/26/2024	Jesse Bair	Review correspondence from the debtor re various case insurance issues and correspond with N. Kuenzi re analysis needed in connection with same (.2); participate in conference with T. Burns re complaint amendment issues (.1);	0.30	\$270.00
7/26/2024	Nathan Kuenzi	Analyze claim count discrepancies between debtor and Committee claim count lists (.2);	0.20	\$110.00
7/26/2024	Alexander Castro	Participate in conference with T. Burns re new project re insurance drop-down issue (.3);	0.30	\$141.00
7/27/2024	Timothy Burns	Review correspondence with Lowenstein and the mediator re August mediation session (.1);	0.10	\$112.00
7/28/2024	Jesse Bair	Review additional correspondence with the debtor and Committee professionals re upcoming mediation sessions (.1);	0.10	\$90.00
7/29/2024	Alexander Castro	Continued detailed legal and factual analysis re excess insurer obligations to drop-down in this case (4.9);	4.90	\$2,303.00
7/29/2024	Alexander Castro	Begin drafting memorandum summarizing excess insurer drop-down obligations in this case (3.0);	3.00	\$1,410.00
7/29/2024	Brian Cawley	Research and analyze Chubb and affiliates statutory filings for material related to CVA cases and potential unfair claims handling cause of action (1.9);	1.90	\$1,045.00

7/30/2024	Alexander Castro	Finish drafting memorandum summarizing excess insurer drop-down obligations in this case (3.3);	3.30	\$1,551.00
7/31/2024	Jesse Bair	Review correspondence with the debtor and Westport re discovery request extensions (.1);	0.10	\$90.00
<b>Totals for Insurance Recovery Activities</b>			<b>152.20</b>	<b>\$101,080.00</b>

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<b>Total Hours and Fees</b>		<b>160.60</b>	<b>\$109,814.00</b>
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**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/01/2024	Second Quarter 2024 PACER	\$44.30
07/09/2024	Hotel, T. Burns (3 nights)	\$942.42
07/09/2024	United Airlines, T. Burns (July 9-12 MSN-SFO)	\$1,959.25
07/09/2024	Uber, T. Burns (airport to hotel)	\$125.88
07/09/2024	Travel meal, T. Burns	\$21.86
07/10/2024	Travel meal, T. Burns	\$21.35
07/11/2024	Travel meal, T. Burns	\$10.86
07/11/2024	Travel meal, T. Burns	\$10.86
07/12/2024	United Airlines, Inflight Wi-Fi, T. Burns	\$8.00
07/12/2024	United Airlines, Inflight Wi-Fi, T. Burns	\$8.00
07/12/2024	Travel meal, J. Bair and T. Burns	\$23.69
07/12/2024	Uber, T. Burns (hotel to airport)	\$132.33
<b>Total Expenses</b>		<b>\$3,308.80</b>

**Timekeeper Summary**

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	47.20	\$470.00	\$22,184.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	1.90	\$550.00	\$1,045.00
Jesse Bair	Partner	17.10	\$900.00	\$15,390.00
Karen Dempsey	Paralegal	0.20	\$340.00	\$68.00
Nathan Kuenzi	Associate	59.90	\$550.00	\$32,945.00
Timothy Burns	Partner	34.00	\$1,120.00	\$38,080.00

**Total Due This Invoice: \$113,122.80**