

**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

**TWENTY FIRST MONTHLY FEE  
STATEMENT 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 FEBRUARY 1, 2025 THROUGH  
FEBRUARY 28, 2025**

Judge: Hon. William J. Lafferty

**Objection Deadline: April 7, 2025  
4:00 p.m. (Pacific Time)**

[No Hearing Requested]

<b>Name of Applicant:</b>	<b>Foley &amp; Lardner LLP</b>
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Effective as of May 8, 2023 by Order entered June 15, 2023 [Dkt. No. 145]
Period for Which Compensation and Reimbursement is Sought:	February 1, 2025 – February 28, 2025
Amount of Compensation Sought as Actual, Reasonable and Necessary: <sup>1</sup>	\$637,824.00
20% Holdback:	\$127,564.80
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: <sup>2</sup>	\$7,285.09
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought:	\$517,544.29

**PRELIMINARY STATEMENT**

On May 8, 2023 (the “Petition Date”), The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor” or “RCBO”)<sup>3</sup> commenced the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case” or the “Bankruptcy Case”). The Debtor continues to operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in this Chapter 11 Case.

On May 23, 2023, the Debtor filed the *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* [Dkt. No. 60] (the “Retention Application”). The Court approved the Retention Application on June 15, 2023, entering the *Order Approving Debtor’s*

<sup>1</sup> Foley & Lardner LLP has agreed not to 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 Monthly Fee Statement.

<sup>2</sup> Foley & Lardner LLP has agreed not to bill the Debtor for the expenses for its attorneys to travel to or from the Bay Area, in connection with this Chapter 11 Case, and such amounts are not included in this Monthly Fee Statement.

<sup>3</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Order.

1 *Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§*  
2 *327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Dkt.  
3 No. 145] (the “Foley Retention Order”).

4 Also on May 23, 2023, the Office of the United States Trustee filed its notice of appointment of  
5 an Official Committee of Unsecured Creditors [Dkt. No. 58].

6 On May 26, 2023, the Debtor filed the *Debtor’s Motion for an Order Establishing Procedures for*  
7 *Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 70] (the  
8 “Compensation Procedures Motion”). The Court granted the Compensation Procedures Motion on June  
9 23, 2023, entering the *Order Authorizing Procedures for Interim Compensation and Reimbursement of*  
10 *Expenses of Professionals* [Dkt. No. 170] (the “Compensation Procedures Order”).

11 Foley & Lardner LLP (“Foley” or “Applicant”), as general bankruptcy counsel to the Debtor,  
12 hereby submits its twenty first monthly fee statement (the “Monthly Fee Statement”) for allowance of  
13 payment of compensation for professional services rendered and for reimbursement of actual and  
14 necessary expenses incurred for the period commencing February 1, 2025 through and including February  
15 28, 2025 (the “Fee Period”) pursuant to the Compensation Procedures Order.

16 By this Monthly Fee Statement, Foley seeks (i) a monthly interim allowance of compensation in  
17 the amount of \$637,824.00 and actual and necessary expenses in the amount of \$7,285.09 for a total  
18 allowance of \$645,109.09 and (ii) payment of \$510,259.20 (80% of the allowed fees pursuant to the  
19 Compensation Procedures Order) and reimbursement of \$7,285.09 (100% of the allowed expenses  
20 pursuant to the Compensation Procedures Order) for a total payment of \$517,544.29 for the Fee Period.

21 **SERVICES RENDERED AND EXPENSES INCURRED DURING THE FEE PERIOD**

22 Attached as **Exhibit 1** is the name of each of Foley’s professionals and paraprofessionals who  
23 performed services for the Debtor in connection with this Chapter 11 Case during the Fee Period covered  
24 by this Monthly Fee Statement and the hourly rate and total fees for each professional during the Fee  
25 Period.

26 Attached as **Exhibit 2** is a summary of hours by category during the Fee Period.

1 Attached as **Exhibit 3** is a summary of expenses included in this Monthly Fee Statement incurred  
2 during the Fee Period.

3 Attached as **Exhibit 4** are the detailed time entries for Foley’s professionals and paraprofessionals  
4 during the Fee Period.

5 **NOTICE OF CUSTOMARY RATE INCREASES**

6 As disclosed in the *Debtor’s Application to Employ Foley & Lardner LLP as General Bankruptcy*  
7 *Counsel Pursuant to 11 U.S.C. §§ 327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal*  
8 *Rules of Bankruptcy Procedure* [Docket No. 60] (the “Foley Employment Application”), Foley’s hourly  
9 billing rates are subject to periodic review and adjustments. Foley’s practice of periodically adjusting its  
10 billing rates was disclosed to the Debtor in Foley’s engagement letter, and the Debtor has agreed to pay  
11 these modified rates pursuant to the engagement letter.

12 In accordance with ordinary practice and as described in the Foley Employment Application, Foley  
13 has changed certain of its billing rates effective as of February 1, 2025. Foley’s hourly billing rates  
14 effective as of February 1, 2025, for Foley’s professionals and paraprofessionals who performed services  
15 during the Fee Period, are as follows:

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Billing Category	U.S. Range
Associate	\$675-\$800
Of Counsel	\$875
Paralegal	\$330-\$450
Partner	\$875-\$1,375
Senior Counsel	\$840-\$875
Special Counsel	\$800

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1 **NOTICE AND OBJECTION PROCEDURES**

2 In accordance with the Compensation Procedures Order, each Notice Party shall have until the  
3 tenth (10<sup>th</sup>) day (or the next business day if such day is not a business day) following service of this  
4 Monthly Fee Statement (the “Objection Deadline”) to serve an objection to the Monthly Fee Statement on  
5 Foley and each of the other Notice Parties.

6 Upon the expiration of the Objection Deadline, the Applicant shall file a certificate of no objection  
7 with the Court, after which the Debtor is authorized and directed to pay the Applicant an amount equal to  
8 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement.

9 If an objection is properly filed, the Debtor shall be authorized and directed to pay the Applicant  
10 80% of the fees and 100% of the expenses not subject to an objection.

11 DATED: March 28, 2025

12 **FOLEY & LARDNER LLP**

13 Thomas F. Carlucci  
14 Shane J. Moses  
15 Emil P. Khatchaturian  
16 Ann Marie Uetz  
17 Matthew D. Lee  
18 Geoffrey S. Goodman  
19 Mark C. Moore

20 /s/ Shane J. Moses

21 SHANE J. MOSES

22 *Counsel for the Debtor*  
23 *and Debtor in Possession*

**EXHIBIT 1**  
**Compensation by Professional**  
**February 1, 2025 – February 28, 2025**

<b>Name of Professional Individual</b>	<b>Initials</b>	<b>Position of the Professional, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate<sup>4</sup></b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Joseph S. Harper	JSH	Associate, 2016	\$800	6.20	\$4,960.00
Mason Roberts	MR	Associate, 2018	\$795	30.80	\$24,486.00
Mary Rofaail	MRL	Associate, 2021	\$675	12.10	\$8,167.50
Mikaela R. Mitcham	MRM	Associate, 2021	\$675	33.50	\$22,612.50
Nora McGuffey	NMCG	Associate, 2020	\$700	14.80	\$10,360.00
Shane J. Moses	SJM	Of Counsel, 2005	\$875	108.30	\$94,762.50
Janelle C. Harrison	JCH	Paralegal, N/A	\$330	30.80	\$10,164.00
Kerry A Farrar	KAFA	Paralegal, N/A	\$450	48.50	\$21,825.00
Ann Marie Uetz	AMUE	Partner, 1993	\$1,050	121.20	\$127,260.00
Eileen R. Ridley	ERR	Partner, 1990	\$1,100	30.40	\$33,440.00
Emil P. Khatchatourian	EPK	Partner, 2009	\$875	36.70	\$32,112.50
Geoffrey S. Goodman	GSG	Partner, 1999	\$1,050	21.20	\$22,260.00
Jonathan Michael Thomas	JMT	Partner, 2010	\$875	5.70	\$4,987.50
Jeff R. Blease	JRBL	Partner, 1998	\$1,375	0.50	\$687.50
Mark C. Moore	MCM	Partner, 2010	\$925	51.20	\$47,360.00
Matthew D. Lee	MDL	Partner, 2006	\$875	63.40	\$55,475.00
Thomas F. Carlucci	TFCA	Partner, 1987	\$1,375	2.00	\$2,750.00
Alan R. Ouellette	AROU	Senior Counsel, 2010	\$875	16.80	\$14,700.00
Elizabeth P. Mazzocco	EPM	Senior Counsel, 2014	\$840	80.10	\$67,284.00
Matthew S. Kiel	MSK	Senior Counsel, 2014	\$875	1.20	\$1,050.00
Tamar N. Dolcourt	TND	Special Counsel, 2009	\$800	38.90	\$31,120.00
<b>TOTAL</b>				<b>754.30</b>	<b>\$637,824.00</b>

<sup>4</sup> Foley adjusted their billing rates at the start of their new fiscal year on February 1, 2025. See Docket No. 60.

**EXHIBIT 2**

**Compensation by Category  
February 1, 2025 – February 28, 2025**

<b>Category</b>	<b>Hours Billed this Fee Period</b>	<b>Total for Fee Statement</b>
003 – Automatic Stay	8.70	\$8,470.00
004 – Bankruptcy Litigation/Adversary Proceedings	90.90	\$79,545.50
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues	20.30	\$11,633.50
006 – Case Administration (Docket Updates, WIP and calendar)	16.10	\$7,091.50
007 – Chapter 11 Plan/ Plan Confirmation	43.70	\$31,953.50
008 – Communications with Client	31.70	\$31,842.50
009 – Corporate Governance and Board Issues	1.20	\$1,050.00
012 – Disclosure Statement	154.30	\$138,566.50
015 – Executory Contracts / Lease Issues	0.30	\$262.50
016 – General Case Strategy (includes calls with client and team calls)	22.70	\$20,590.50
018 – Non-Bankruptcy Litigation	74.30	\$57,072.50
020 – Retention/Billing/Fee Applications for Debtor Professionals	49.00	\$38,615.00
021 – Retention/ Fee Applications: Ordinary Course Professionals	5.10	\$4,290.00
022 – Retention/ Fee Applications: Other Professionals	6.80	\$4,642.50
025- U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Reports	3.60	\$3,041.00
026 – Unsecured Creditors Issues/Communications/Meetings	3.20	\$3,110.00
027 – Real Estate and Real Property Issues	0.70	\$575.00
028 – Tort Proofs of Claims	1.30	\$670.00
031 – Insurance Issues (coverage, includes adversary proceeding)	118.90	\$98,428.00
032 – Rule 2004 Motions/Discovery/Subpoenas	11.00	\$8,571.50
034 – Other Motion Practice	1.50	\$1,312.50
038 – Mediation	89.00	\$86,490.00
<b>TOTAL</b>	<b>754.30</b>	<b>\$637,824.00</b>

**EXHIBIT 3**

**Expense by Category  
February 1, 2025 – February 28, 2025**

<b>Costs/Expense</b>	<b>Amount Billed</b>
Electronic Legal Research Services	\$439.36
LSS – eDiscovery Services	\$3,800.00
Meals	\$3,045.73
<b>TOTAL</b>	<b>\$7,285.09</b>

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**EXHIBIT 4**

**Time Detail Entries  
February 1, 2025 – February 28, 2025**

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

Date: March 27, 2025  
Invoice No.: 51035380  
Our Ref. No.: 100845-0402

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Services through February 28, 2025

Amount due for professional services rendered regarding Chapter 11 Bankruptcy \$637,824.00

Total Expenses: \$7,285.09

**Amount Due:** \$645,109.09

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Please note that as of February 1, 2025, there may be certain matters on which hourly legal fees have been adjusted. This may or may not affect you. Please contact your principal attorney at the Firm if you have questions.

Please reference your invoice number 51035380 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**

02/03/25	AMUE	Analyze strategy for JCCP 5108 proceedings in light of Court's denial of Committee's motion to lift stay to try state court cases.	1.50	\$1,575.00
02/04/25	AMUE	Revisions to order regarding motion to lift stay in effort to resolve order.	0.90	\$945.00
02/06/25	AMUE	Further revisions to order regarding motion for relief from stay.	0.50	\$525.00
02/06/25	SJM	Respond to A. Uetz regarding order denying lift stay motion (.2); revise proposed order based on call with Committee counsel (.3); email to Committee counsel regarding same (.2).	0.70	\$612.50
02/07/25	EPK	Review revisions to the proposed order on the Committee's motion for relief from stay (.1); email correspondence with P. Pascuzzi and A. Uetz regarding JCCP 5108 co-defendant stay issues (.2); evaluate feedback received from S. Moses regarding same (.1).	0.40	\$350.00
02/07/25	SJM	Call with counsel for Archdiocese of San Francisco regarding approach to non-debtor stay issues in JCCP (.5); analyze second circuit decision regarding same (.5); email to A. Uetz regarding same (.2).	1.20	\$1,050.00
02/07/25	SJM	Review Committee edits to lift stay order (.2); attention to finalizing same (.1).	0.30	\$262.50
02/09/25	AMUE	Revisions to lift stay order regarding state court cases (.5); review outstanding orders to be submitted per agreement with Committee (.7).	1.20	\$1,260.00
02/10/25	EPK	Review revised and near-final form of order denying the Committee's lift-stay motion without prejudice.	0.10	\$87.50
02/10/25	SJM	Finalize order on Committee motion for relief from stay, including email correspondence with B. Weisenberg regarding final form of order.	0.30	\$262.50

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02/11/25	EPK	Email correspondence with Foley restructuring working group regarding the proposed form of lift-stay motion denial order and submission of same to the Court.	0.30	\$262.50
02/14/25	EPK	Follow up on status of proposed order denying the Committee's lift-stay motion with prejudice (.1); email correspondence with JCCP 5108 defense liaison counsel D. Zamora of Weintraub Tobin regarding as-entered lift-stay denial order (.1).	0.20	\$175.00
02/18/25	SJM	Email to E. Khatchaturian regarding issues related to stay.	0.30	\$262.50
02/20/25	AMUE	Meeting with R. Manns and E. Khatchaturian regarding state court cases.	0.80	\$840.00
Task Total:			8.70	\$8,470.00

**004 Bankruptcy Litigation/Adversary Proceedings**

02/03/25	GSG	Edit property of the estate stipulation.	0.40	\$420.00
02/03/25	JSH	Work on 9019 motion regarding Bennett Trust settlement.	0.30	\$240.00
02/04/25	AMUE	Analyze issue concerning property of the estate as it relates to the Committee's objection to OPF's proof of claim and adversary proceeding in attempt to settle the issue concerning church property (1.6); meeting with B. Weisenberg and Foley team regarding possible resolution (.5); revisions to proposed stipulation regarding same (.8).	2.90	\$3,045.00
02/04/25	GSG	Edit property of the estate stipulation (.5); telephone conference with team regarding same (.5).	1.00	\$1,050.00
02/04/25	MDL	Telephone conference with Foley team regarding revisions to property of the estate stipulation (partial).	0.30	\$262.50
02/04/25	MDL	Telephone conference with Lowenstein and Foley teams regarding property of the estate stipulation.	0.40	\$350.00
02/04/25	MDL	Evaluate property of the estate stipulation options.	0.30	\$262.50

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02/04/25	MDL	Revise proposed stipulation on property of the estate issues.	0.30	\$262.50
02/04/25	SJM	Prepare stipulation and orders to continue hearings on motions to dismiss and on objection to OPF claim.	2.60	\$2,275.00
02/04/25	SJM	Analyze issues regarding property of the estate stipulation (.4); emails with case team regarding revisions to same (1.1); prepare draft revision based on comments from team (.4).	1.90	\$1,662.50
02/05/25	GSG	Correspondence with A. Uetz regarding OPF claim issues and property of the estate.	0.20	\$210.00
02/05/25	SJM	Emails with A. Uetz and G. Goodman regarding stipulations to continue motion to dismiss hearings.	0.40	\$350.00
02/05/25	SJM	Email case team regarding analysis of OPF claim issue.	0.70	\$612.50
02/06/25	AMUE	Further revisions to proposed stipulation concerning property of the estate as it relates to OPF objection and adversary proceeding (.7); meeting with G. Goodman and S. Moses to finalize same (.3).	1.00	\$1,050.00
02/06/25	SJM	Call with A. Uetz and G. Goodman regarding property of the estate stipulation (.4); draft email to Committee counsel regarding same (.3).	0.70	\$612.50
02/06/25	SJM	Emails with case team regarding scheduling stipulations (.3); email to Committee counsel regarding same (.2).	0.50	\$437.50
02/07/25	GSG	Review Committee correspondence regarding property of the estate stipulation (.2); analyze next steps in light of same (.3).	0.50	\$525.00
02/07/25	JSH	Edit 9019 motion regarding Bennett Trust settlement (1.0); call with probate court counsel regarding Bennett Trust settlement (.3).	1.30	\$1,040.00
02/10/25	GSG	Correspondence with B. Weisenberg regarding property of the estate call.	0.10	\$105.00
02/10/25	JSH	Revise 9019 motion regarding Bennett Trust settlement (.9); call with probate court counsel regarding Bennett Trust settlement (.3).	1.20	\$960.00

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02/10/25	MDL	Evaluate status of Committee stipulations on property of the estate and motion practice.	0.20	\$175.00
02/10/25	SJM	Review comments from Committee counsel on stipulations to continue hearings (.3); call with C. Restel regarding same (.2).	0.50	\$437.50
02/11/25	EPK	Review email from J. Harper summarizing revisions to the Bennett Trust settlement motion (.1); brief review of the revised draft of the settlement motion and supporting documents (.2).	0.30	\$262.50
02/11/25	GSG	Telephone conference with B. Weisenberg regarding property of the estate stipulation.	0.50	\$525.00
02/11/25	JSH	Revise 9019 motion regarding Bennett Trust settlement and supporting declaration, proposed order and notice.	1.60	\$1,280.00
02/11/25	SJM	Revise stipulations for scheduling of motions to dismiss adversary proceedings based on agreement with Committee counsel (.5); emails with Committee counsel regarding same (.2).	0.70	\$612.50
02/12/25	AMUE	Strategize regarding property of the estate issues raised by adversary proceeding (1.2); meeting with G. Goodman and S. Moses regarding same (.4); review email received from B. Weisenberg regarding same (.3).	1.90	\$1,995.00
02/12/25	GSG	Telephone conferences with B. Weisenberg regarding property of the estate OPF (.8); telephone conference with A. Uetz regarding same (.4); review B. Weisenberg correspondence regarding OPF claim (.2).	1.40	\$1,470.00
02/12/25	SJM	Review Committee draft stipulation on 546(a) deadline (.3); analyze issues regarding property of the estate stipulation (.5).	0.80	\$700.00
02/12/25	SJM	Call with A. Uetz and G. Goodman regarding property of the estate stipulation (.4); follow up on same (.2).	0.60	\$525.00
02/13/25	SJM	Email to Committee counsel regarding Committee draft stipulation on 546(a) deadline.	0.30	\$262.50
02/14/25	JCH	Finalize opposition to Committee's brief.	0.50	\$165.00

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02/19/25	SJM	Analyze Committee objections to motions to dismiss and evaluate arguments for reply (2.9); email to case team regarding same (.5).	3.40	\$2,975.00
02/20/25	AMUE	Communications with B. Weisenberg regarding objection to OPF claim (.4) and analyze issue related to same (.4).	0.80	\$840.00
02/20/25	GSG	Review Committee oppositions to motions to dismiss (.9); meet with S. Moses and N. McGuffey regarding same (.6); correspondence with R. Manns regarding same (.1).	1.60	\$1,680.00
02/20/25	JSH	Communications with probate counsel R. Lund regarding Bennett Trust settlement agreement.	0.20	\$160.00
02/20/25	NMCG	Review the Committee's oppositions to the motions to dismiss (1.5); discuss the same with G. Goodman and S. Moses (.5).	2.00	\$1,400.00
02/20/25	SJM	Email to client regarding Committee oppositions to motions to dismiss (.3); prepare for call regarding strategy for replies in support of motions to dismiss (.8); call with G. Goodman and N. McGuffey regarding same (.6).	1.70	\$1,487.50
02/21/25	NMCG	Meeting with G. Goodman and Norton Rose regarding Committee's oppositions to motions to dismiss.	0.50	\$350.00
02/22/25	GSG	Review analysis on alter ego and substantive consolidation claims.	0.40	\$420.00
02/22/25	NMCG	Research issues related to reply in support of the motions to dismiss.	1.90	\$1,330.00
02/24/25	JSH	Communications with probate counsel R. Lund regarding Bennett Trust settlement agreement.	0.20	\$160.00
02/24/25	NMCG	Continue research for replies in support of the motions to dismiss (1.1); correspond with G. Goodman regarding the same (.5).	1.60	\$1,120.00
02/24/25	SJM	Work on reply in support of motion to dismiss Committee adversary proceeding against RCBO and RCWC.	4.10	\$3,587.50
02/25/25	EPK	Confer with G. Goodman regarding adversary proceeding motion to dismiss briefing issues.	0.10	\$87.50

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02/25/25	GSG	Review draft of motion to dismiss reply in RCWC adversary (.8); edit same (2.7); telephone conference and correspondence with S. Moses and N. McGuffey regarding same (.8); correspondence with team regarding possible adjournment (.3); telephone conference with R. Manns regarding replies and possible adjournment (.4); update M. Kemner and A. Bardos regarding motion to dismiss replies (.2).	5.20	\$5,460.00
02/25/25	NMCG	Draft part of the reply in support of the motion to dismiss regarding mootness argument (2.1); meeting with G. Goodman and S. Moses to discuss the draft replies and status of adversaries (.5).	2.60	\$1,820.00
02/25/25	SJM	Research regarding legal issues on pleading alter ego under California law.	3.50	\$3,062.50
02/25/25	SJM	Continue drafting reply in support of motion to dismiss complaint against Debtor and non-debtor Catholic entities.	6.10	\$5,337.50
02/25/25	SJM	Draft reply in support of motion to dismiss complaint against Debtor and OPF.	2.10	\$1,837.50
02/26/25	GSG	Review draft of motion to dismiss reply in OPF case and edit same (.9); edit and finalize motion to dismiss reply in RCWC case and reply in OPF case (2.8); telephone conference and correspondence with S. Moses regarding same (.6); correspondence with A. Uetz regarding same (.2); correspondence with M. Kemner regarding same (.2).	4.70	\$4,935.00
02/26/25	JCH	Revise Debtor's replies to objections to motions to dismiss (1.8); email correspondence with Foley team regarding same (.5); finalize and file replies in both adversary proceedings (.8).	3.10	\$1,023.00
02/26/25	NMCG	Research case law regarding whether alter ego claims are direct claims and other issues noted in the adversary reply briefs (2.7); revise replies briefs for filing (.5); correspond with Foley team regarding the same (.3).	3.50	\$2,450.00
02/26/25	SJM	Further work drafting reply in support of motion to dismiss Committee adversary proceeding against Debtor and OPF.	6.20	\$5,425.00

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02/26/25	SJM	Revise reply in support of motion to dismiss Committee adversary proceeding against Debtor and OPF based on comments from G. Goodman (.8); final review of reply in support of motion to dismiss Committee adversary proceeding against Debtor and non-debtor Catholic entities (.5); finalize replies (.4).	1.70	\$1,487.50
02/27/25	GSG	Review OPF claim stipulation (.2); edit same (.2); telephone conference and correspondence with R. Manns regarding same (.3); telephone conference with A. Uetz regarding OPF and motions to dismiss (.3).	1.00	\$1,050.00
02/27/25	TND	Prepare stipulation and proposed order regarding withdrawal of OPF claim.	0.90	\$720.00
02/28/25	GSG	Telephone conference with B. Weisenberg regarding motions to dismiss and 3-4 hearing (.3); telephone conferences with Norton Rose regarding 3-4 hearing and related issues (.6); correspondence with R. Manns regarding OPF claim stipulation (.2); correspondence with Committee regarding property of the estate stipulation (.2); review revised property of the estate stipulation (.3); correspondence with team regarding motion to dismiss hearing and Committee matters (.4); begin preparing for motion to dismiss hearing (1.2).	3.20	\$3,360.00
02/28/25	NMCG	Help prepare G. Goodman for hearing on the motions to dismiss.	1.00	\$700.00
02/28/25	SJM	Call with G. Goodman, R. Manns, and J. Blanchard regarding approach to hearing on motions to dismiss Committee adversary proceedings (.2); further call regarding same (.5); analyze Committee edits to property of the estate stipulation (.6).	1.30	\$1,137.50
Task Total:			90.90	\$79,545.50

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

02/04/25	MCM	Conference call with Committee counsel regarding misfiled claims by certain counsel to Committee member and related issues that may give rise to need to amend.	0.50	\$462.50
02/04/25	MCM	Email correspondence with Committee counsel regarding misfiled claim by counsel to a Committee member.	0.30	\$277.50
02/05/25	MCM	Analysis of issues raised by Committee counsel regarding misfiled claims (.8); email correspondence with Committee counsel regarding same (.5).	1.30	\$1,202.50
02/06/25	MCM	Email correspondence with KCC/Verita regarding updated abuse claims register (.2); review same for amended or additional duplicate claims (.4); email correspondence with Committee counsel regarding misfiled claims and reconciliation of same (.3); call with KCC/Verita regarding potential solicitation issue with claims filed under wrong name (.4); analysis of solicitation issues regarding claims (.2).	1.50	\$1,387.50
02/07/25	KAFA	Strategize updates to Master Claims Review analysis to include claimant date of birth and age at the time of abuse (1.5); call with M. Moore regarding same (.3); call with M. Moore and J. Harrison regarding state court case bucketing project (.3).	2.10	\$945.00
02/09/25	MCM	Continue analysis of claims following information requests from various parties in connection with disclosure statement.	0.80	\$740.00
02/10/25	KAFA	Update Master Claims Review analysis to include claimant date of birth and age at the time of abuse.	5.80	\$2,610.00
02/11/25	KAFA	Update Master Claims Review analysis to include claimant date of birth and age at the time of abuse.	4.30	\$1,935.00
02/13/25	MRL	Confer with M. Roberts regarding reviewing sexual abuse claims based on perpetrators.	0.20	\$135.00
02/17/25	EPK	Evaluate confidentiality issues relating to abuse proofs of claim.	0.20	\$175.00

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02/20/25	KAFA	Analysis of late-filed proofs of claim in anticipation of production to insurers.	0.50	\$225.00
02/21/25	EPK	Emails with R. Manns of NRF and M. Moore regarding proposed form of amended bar date order to address RCWC confidentiality issues (.2); review proposed amendment to the bar date order (.1).	0.30	\$262.50
02/21/25	JCH	Prepare spreadsheet listing receipt of confidentiality agreements executed by insurer parties, indicating party sending agreements and party confirming execution of agreements.	1.00	\$330.00
02/25/25	EPK	Follow up on proposed amendment to the bar date order confidentiality protocol.	0.10	\$87.50
02/25/25	JCH	Update spreadsheet of confidentiality agreements executed by insurer parties.	0.70	\$231.00
02/26/25	EPK	Email correspondence with B. Weisenberg of Lowenstein and R. Manns of NRF regarding proposed amendment to the bar date order confidentiality protocol.	0.20	\$175.00
02/27/25	EPK	Email correspondence with R. Manns of NRF regarding further revised draft of amended bar date order and confidentiality protocol (.1); review proposed stipulation between RCBO, the Committee, and RCWC regarding same (.1).	0.20	\$175.00
02/28/25	MCM	Attention to issues concerning amended claims filed or to be filed by state court counsel for Committee chairman following defective earlier filings.	0.30	\$277.50
Task Total:			20.30	\$11,633.50

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

02/03/25	JCH	Update daily docket report.	0.50	\$165.00
02/04/25	JCH	Update daily docket report.	0.20	\$66.00
02/05/25	EPK	Comment on this week's updates to the master case calendar.	0.10	\$87.50

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02/05/25	JCH	Update Timeline and Master Case Calendar and email same to J. Harper for review (.5); update daily docket report (.5).	1.00	\$330.00
02/06/25	JCH	Update daily docket report.	0.50	\$165.00
02/06/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.50	\$400.00
02/07/25	JCH	Prepare (.1) and file (.1) Notice of Core Service List as of February 7, 2025; update daily docket report (.2).	0.40	\$132.00
02/07/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.80	\$540.00
02/10/25	JCH	Update daily docket report.	0.20	\$66.00
02/11/25	JCH	Update daily docket report.	0.50	\$165.00
02/12/25	JCH	Update daily docket report.	0.50	\$165.00
02/12/25	JCH	Calendar multiple extended deadlines related to stipulation filed in adversary proceedings.	0.50	\$165.00
02/13/25	JCH	Update daily docket report.	0.50	\$165.00
02/14/25	JCH	Update daily docket report.	0.50	\$165.00
02/17/25	EPK	Email correspondence with J. Harper and J. Harrison regarding this week's updates to the master case calendar (.2); review upcoming estate reporting obligation deadlines (.1).	0.30	\$262.50
02/17/25	JCH	Update Timeline and Master Case Calendar and email same to J. Harper for review (.5); prepare weekly update and circulate to Foley group (.5); circulate updated Timeline and Master Case Calendar (.2); update daily docket report (.2).	1.40	\$462.00
02/17/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.60	\$480.00
02/18/25	JCH	File 2015.3 Period Report regarding CTN (.2); update daily docket report (.5).	0.70	\$231.00
02/19/25	JCH	Update daily docket report.	0.50	\$165.00
02/20/25	JCH	Update daily docket report.	0.50	\$165.00
02/21/25	JCH	Update daily docket report.	0.50	\$165.00

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02/23/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.70	\$472.50
02/24/25	EPK	Confer with J. Harper and J. Harrison regarding this week's updates to the master case calendar and specific dates relating to pending adversary proceedings.	0.20	\$175.00
02/24/25	JCH	Revise Timeline and Master Case Calendar and send to J. Harper for review (.5); update daily docket report (.5).	1.00	\$330.00
02/24/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.30	\$240.00
02/24/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.50	\$337.50
02/25/25	JCH	Update daily docket report.	0.50	\$165.00
02/25/25	MRL	Finalize summarizing daily docket activity and upcoming deadlines for client.	0.30	\$202.50
02/26/25	JCH	Update daily docket report.	0.50	\$165.00
02/27/25	JCH	Calendar updated matters (.2); update daily docket report (.2).	0.40	\$132.00
02/28/25	JCH	Update daily docket report.	0.50	\$165.00
		Task Total:	16.10	\$7,091.50

**007 Chapter 11 Plan/ Plan Confirmation**

02/09/25	MCM	Analysis of other diocesan and religious-order bankruptcy cases regarding insurance assignment risks and disclosures of same.	1.00	\$925.00
02/10/25	MCM	Analysis of parish issues in other diocesan bankruptcy cases and restructurings.	0.80	\$740.00
02/11/25	ERR	Edit plan amendment regarding insurance issues.	0.90	\$990.00
02/13/25	MDL	Revise chapter 11 plan.	2.20	\$1,925.00
02/17/25	MCM	Revise Trust Distribution Plan and Settlement Agreement based on revisions to disclosure statement and plan documents eliminating neutral and incorporating re-review by Abuse Claims Reviewer, among other changes.	1.10	\$1,017.50

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02/18/25	JCH	Finalize and file second amended plan (.5); prepare redline for filing with notice (.2).	0.70	\$231.00
02/18/25	MRM	Analysis in connection with discovery, for plan issues.	0.70	\$472.50
02/19/25	MCM	Email correspondence with Foley team regarding plan issues.	0.60	\$555.00
02/20/25	MRM	Analysis in connection with discovery for plan issues.	3.10	\$2,092.50
02/21/25	MDL	Evaluate reorganization strategy in light of client feedback.	0.50	\$437.50
02/21/25	MRM	Draft Federal Rule of Bankruptcy Procedure 2004 Motion requesting discovery be conducted against Committee in connection with dispute over plan confirmation (5.2); begin drafting discovery in connection with motion (2.0).	7.20	\$4,860.00
02/24/25	MRM	Analyze privileged issue concerning discovery in connection with dispute with Committee over plan confirmation.	3.60	\$2,430.00
02/25/25	MRM	Analyze privileged issue concerning discovery in connection with dispute with Committee over plan confirmation.	4.10	\$2,767.50
02/26/25	AMUE	Analyze plan amendment issues related to liquidation analysis (1.3) and related to insurance (1.1).	2.40	\$2,520.00
02/26/25	MRM	Draft discovery pursuant to Federal Rule of Civil Procedure 26 to Committee members in connection with dispute over plan, settlement, and plan confirmation.	6.20	\$4,185.00
02/27/25	MRM	Draft discovery pursuant to Federal Rule of Civil Procedure 26 to Committee members in connection with dispute over plan, settlement, and plan confirmation.	4.80	\$3,240.00
02/28/25	MRM	Revise discovery requests to Committee (.9); incorporate comments from team for finalizing discovery (2.9).	3.80	\$2,565.00
		Task Total:	43.70	\$31,953.50

**008 Communications with Client**

02/04/25	AMUE	Review strategy decks with leadership in preparation for mediation.	1.20	\$1,260.00
02/05/25	AMUE	Finalize lengthy communication to finance team regarding privileged matter concerning mediation (.8) and follow-up communications with team regarding same (.5).	1.30	\$1,365.00
02/05/25	AMUE	Finalize memo to client leadership regarding privileged matter concerning mediation.	1.50	\$1,575.00
02/05/25	AMUE	Communications with R. Medeiros concerning privileged matter related to claimants.	0.50	\$525.00
02/05/25	MDL	Revise communication to client leadership regarding mediation strategy.	0.50	\$437.50
02/06/25	AMUE	Communications with client leadership regarding privileged matter concerning mediation.	0.50	\$525.00
02/07/25	AMUE	Meeting with finance team to prepare for mediation (1.1) and follow up regarding same (.7).	1.80	\$1,890.00
02/07/25	MDL	Telephone conference with A. Uetz, VeraCruz, and A. Bardos regarding strategy upon return to mediation.	1.10	\$962.50
02/07/25	TND	Provide bankruptcy-related comments on client publication.	0.90	\$720.00
02/12/25	AMUE	Prepare for (1.3) and meeting with (1.5) finance team to prepare for amended disclosure statement and for mediation.	2.80	\$2,940.00
02/12/25	AMUE	Meeting with D. Flanagan regarding privileged real estate matter.	0.70	\$735.00
02/12/25	MDL	Participate in discussion with M. Kemner, A. Bardos, VeraCruz, A&M, and Foley teams regarding plan funding issues.	0.50	\$437.50
02/12/25	SJM	Prepare for (.5) and attend (1.5) client finance team call; email to Foley team regarding follow up to same (.2).	2.20	\$1,925.00
02/12/25	TND	Communications with A. Uetz on comments to RCBO publication (.1); mark up document (.3); call with H. Osman regarding same (.2).	0.60	\$480.00

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02/14/25	AMUE	Multiple communications with M. Kemner and A. Bardos regarding privileged matter concerning real estate (1.4); draft privileged document for Bishop Barber regarding same (.9).	2.30	\$2,415.00
02/18/25	AMUE	Revisions to draft document for Bishop Barber regarding OPF.	1.10	\$1,155.00
02/18/25	AMUE	Draft memorandum to A. Bardos and M. Kemner regarding privileged issue related to plan and disclosure statement amendment.	1.20	\$1,260.00
02/19/25	AMUE	Prepare for (.6) and meeting with (1.0) A. Bardos and M. Kemner regarding privileged issue concerning mediation; draft communication for Bishop Barber regarding OPF (1.1); communication with VeraCruz regarding assets utilized to support proposed plan of reorganization (.6).	3.30	\$3,465.00
02/21/25	AMUE	Prepare for meeting with Bishop Barber and finance team regarding mediation strategy (1.1) and lead meeting (1.6).	2.70	\$2,835.00
02/21/25	MDL	Telephone conference with Bishop Barber, A. Bardos, and M. Kemner regarding reorganization strategy.	1.60	\$1,400.00
02/25/25	AMUE	Communication with M. Kemner following mediation (.3); draft summary update for client regarding status of mediation (.9).	1.20	\$1,260.00
02/27/25	AMUE	Communications with M. Kemner regarding privileged matter concerning plan of reorganization (.8); privileged communication with finance team regarding cash management (.7).	1.50	\$1,575.00
02/27/25	SJM	Email to client regarding status of motions to dismiss Committee adversary proceedings.	0.20	\$175.00
02/28/25	AMUE	Communications with M. Kemner and A. Bardos regarding mediation.	0.50	\$525.00
Task Total:			31.70	\$31,842.50

**009 Corporate Governance and Board Issues**

02/04/25	MSK	Analysis of OPF fund agreements and OPF organizational documents in connection with account management and related lending matters (.8); exchange correspondence (multiple) with J. Witt in connection therewith (.2); correspondence with A. Uetz, G. Goodman, and J. Witt regarding OPF fund agreements (.2).	1.20	\$1,050.00
Task Total:			1.20	\$1,050.00

**012 Disclosure Statement**

02/02/25	MCM	Analyze notes from meet and confer with Committee regarding necessary amendments and/or amplifications to disclosure statement (1.0); draft list of tasks in preparation for filing amendment on February 18 (.5).	1.50	\$1,387.50
02/03/25	AMUE	Communications with M. Mason regarding property valuation (.6); review documents concerning real estate valuation (1.1).	1.70	\$1,785.00
02/03/25	AMUE	Review Committee's objection to disclosure statement approval concerning bad faith issue to further strategy for hearing before Judge Lafferty.	1.40	\$1,470.00
02/03/25	KAFA	Call with T. Dolcourt to discuss collection of documents to assist with Hilco real estate valuation process.	0.40	\$180.00
02/03/25	MCM	Draft second amended plan and second amended disclosure statement in support of same (1.2); email memorandum to M. Lee and S. Moses regarding necessary amendments and assignments (.9); conference call with Foley team regarding amendments to plan documents (.5).	2.60	\$2,405.00
02/03/25	SJM	Prepare for call with M. Moore regarding edits to disclosure statement including review of objections and prior disclosure statement (.7); call with M. Moore (.2).	0.90	\$787.50
02/03/25	TND	Call with K. Farrar on documents to be used for Hilco analysis (.2); review documents for same (.1).	0.30	\$240.00

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02/04/25	MDL	Evaluate documents to be shared with Hilco for real estate valuation review.	1.60	\$1,400.00
02/04/25	MDL	Telephone conference with M. Moore regarding revisions to disclosure statement and potential alternative plan terms.	0.50	\$437.50
02/04/25	TND	Prepare information on real estate transactions, leases, and other information for Hilco team to complete real estate valuation project (2.6); telephone and email communications with M. Lee on same (.3).	2.90	\$2,320.00
02/05/25	MDL	Evaluate additional property-related documents to share with Hilco.	0.20	\$175.00
02/05/25	MRL	Analyze insurance assignments in other dioceses cases.	1.20	\$810.00
02/05/25	TND	Additional correspondence with Hilco team on materials needed for valuation project (.1); email with M. Lee on valuation matters (.1).	0.20	\$160.00
02/06/25	MRL	Finalize reviewing analysis of insurance assignments in other dioceses cases.	1.60	\$1,080.00
02/06/25	NMCG	Research precedent regarding insurance disclosures in disclosure statements.	0.90	\$630.00
02/07/25	EPM	Conference call with M. Moore regarding drafting brief on impact of plan on bad faith claim.	0.50	\$420.00
02/07/25	MCM	Revisions to second amended disclosure statement based on necessary amendments, clarifications, and amplifications (1.2); email correspondence with E. Mazzocco regarding necessary amendments to Risk Factors based on feedback from insurer parties (.3); analysis of other diocesan cases and parish outcomes (.4).	1.90	\$1,757.50
02/07/25	NMCG	Review precedent for disclosure statements regarding insurance assignments and discharge issues.	0.80	\$560.00
02/09/25	SJM	Work on revisions to second amended disclosure statement.	2.10	\$1,837.50
02/10/25	AMUE	Meeting with M. Moore, M. Lee and S. Moses to strategize regarding amendments to disclosure statement (.6); outline strategy for hearing on motion to approve disclosure statement (.9).	1.50	\$1,575.00

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02/10/25	EPM	Revise insurance risk disclosure section of amended disclosure statement.	1.30	\$1,092.00
02/10/25	MCM	Conference call with M. Lee regarding amendments to disclosure statement and plan following discussion with the Committee (1.1); revisions to disclosure statement (.7).	1.80	\$1,665.00
02/10/25	MCM	Prepare for (.2) and participate in (.6) conference call with A. Uetz, M. Lee, and S. Moses regarding mediation, plan, and disclosure statement issues.	0.80	\$740.00
02/10/25	MDL	Evaluate changes to disclosure statement and additional changes to be made.	0.80	\$700.00
02/10/25	MDL	Strategize with M. Moore regarding amendments to disclosure statement.	1.10	\$962.50
02/10/25	MDL	Analyze Committee's supplemental brief on insurance assignment issues.	0.20	\$175.00
02/10/25	SJM	Meeting with A. Uetz, M. Lee, and M. Moore regarding disclosure statement next steps and approach (.6); prepare for same (.6).	1.20	\$1,050.00
02/11/25	EPM	Revise insurance risks section of amended disclosure statement.	0.50	\$420.00
02/11/25	MCM	Analyze revisions to disclosure statement regarding risks associated with the Litigation Option (.5); analyze necessary revisions to plan documents consistent with removal of neutral option and other changes contemplated by second amended plan (.6).	1.10	\$1,017.50
02/12/25	AMUE	Review transcripts from disclosure statement hearing to inform certain revisions to disclosure statement.	1.10	\$1,155.00
02/12/25	AMUE	Revisions to amended disclosure statement based on meeting with finance team.	1.40	\$1,470.00
02/12/25	EPM	Draft response in opposition to Committee's brief regarding impact of bad faith claims on disclosure statement and plan (4.1); conference call with M. Lee and E. Ridley regarding strategy for same (.6).	4.70	\$3,948.00
02/12/25	MDL	Strategize for reply brief on insurance issues with E. Ridley and E. Mazzocco.	0.60	\$525.00

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02/12/25	MDL	Strategize with M. Moore regarding amendments to disclosure statement.	0.50	\$437.50
02/13/25	AMUE	Revisions to disclosure statement to account for Judge Lafferty's comments to date (2.9); meeting with D. Flanagan and M. Lee to review certain revisions to disclosure statement (1.2); multiple (>5) communications with M. Kemner and A. Bardos regarding revisions to disclosure statement (1.1) and make further changes to align with their comments (1.1).	6.30	\$6,615.00
02/13/25	AMUE	Review Committee's brief regarding assignment of insurance/bad faith issue (.4) and provide direction to align Foley team on reply to same (.4).	0.80	\$840.00
02/13/25	EPM	Continue drafting response in opposition to Committee's brief regarding the plan and disclosure statement's impact on bad faith claims (6.0); legal research in support of same (3.3).	9.30	\$7,812.00
02/13/25	MCM	Conference call with M. Lee regarding second amended plan terms and potential modification of same (.5); revise Executive Summary of second amended disclosure statement and circulate to M. Lee for review (.7); follow up regarding same and further revisions to second amended disclosure statement (.6); revise brief in response to Committee statement on insurance assignment and email correspondence regarding same (1.1).	2.90	\$2,682.50
02/13/25	MDL	Email correspondence to Lowenstein regarding drafts of revised plan and disclosure statement.	0.20	\$175.00
02/13/25	MDL	Revise draft of amended disclosure statement.	2.40	\$2,100.00
02/13/25	MDL	Telephone conference with A. Uetz and D. Flanagan (VeraCruz) regarding real estate-related disclosures in disclosure statement.	1.20	\$1,050.00
02/13/25	MDL	Strategize with Foley team regarding revisions to disclosure statement.	0.60	\$525.00
02/13/25	MDL	Email exchange with counsel for insurers regarding drafts of revised plan and disclosure statement.	0.30	\$262.50

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02/13/25	SJM	Revise brief on insurance bad faith issues (3.1); call with E. Mazzocco regarding edits to same (.5).	3.60	\$3,150.00
02/14/25	AMUE	Analyze revisions to amended disclosure statement based on client's input regarding same.	1.90	\$1,995.00
02/14/25	EPM	Revise brief in opposition to Committee's brief regarding the impact of the disclosure statement and plan on bad faith claims (3.6); conduct citation check of same (1.0).	4.60	\$3,864.00
02/14/25	ERR	Review draft of insurers' brief against Committee position on disclosure statement and edits to Debtor brief related thereto.	1.30	\$1,430.00
02/14/25	MCM	Revisions to brief in opposition to Committee statement on insurance assignment (.6); email correspondence regarding same (.3); further revisions to second amended disclosure statement based on feedback from Foley team (.5); review comments to brief in opposition and respond to same with client parties (.4).	1.80	\$1,665.00
02/14/25	MDL	Revise brief in opposition to Committee's position on insurance assignment and bad faith claim issues.	1.20	\$1,050.00
02/14/25	SJM	Assist with finalizing opposition to Committee brief on insurance issues in light of comments from insurers.	1.20	\$1,050.00
02/15/25	EPK	Review RCBO's brief in opposition to the Committee's brief regarding the Court's disclosure-related memorandum.	0.20	\$175.00
02/17/25	AMUE	Analyze real estate for purposes of liquidation analysis (1.2); multiple communications with Hilco and VeraCruz teams regarding same (.8); review Committee comments to draft amended disclosure statement (.8).	2.80	\$2,940.00
02/17/25	MCM	Review issues list from Committee regarding second amended disclosure statement.	0.50	\$462.50
02/17/25	MDL	Analyze Committee redline and comments to draft amended disclosure statement.	0.60	\$525.00

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02/17/25	SJM	Call with A. Uetz and Hilco team regarding Hilco valuation analysis and preliminary findings (1.2); review and compare Hilco findings to prior valuations (.8); analyze implications for liquidation analysis (.4).	2.40	\$2,100.00
02/18/25	AMUE	Meeting with C. Moore regarding liquidation analysis.	0.30	\$315.00
02/18/25	AMUE	Provide advice to Foley team regarding amended disclosure statement to be filed today.	0.90	\$945.00
02/18/25	AMUE	Meeting with Hilco and finance team regarding valuation of real estate (1.5); analyze privileged issue related to liquidation analysis (1.2).	2.70	\$2,835.00
02/18/25	JCH	Finalize second amended disclosure statement and exhibits for filing (.5); prepare redline against amended disclosure statement and revise notice regarding same (.5); file second amended disclosure statement and exhibits (.5).	1.50	\$495.00
02/18/25	MCM	Strategy meeting with Foley team regarding liquidation analysis and related issues prior to filing deadline for second amended disclosure statement (partial) (1.0); prepare for and participate in meet and confer with Committee regarding second amended disclosure statement (.7); email and telephone communications with Foley team regarding potential continuance of hearing regarding same (.4); revise disclosure statement with M. Lee (.4).	2.50	\$2,312.50
02/18/25	MDL	Telephone conference with Hilco team and Foley team regarding property review and valuation analysis.	1.60	\$1,400.00
02/18/25	MDL	Evaluate additional amendments to disclosure statement.	0.30	\$262.50
02/18/25	MDL	Revise amended disclosure statement in advance of filing.	2.30	\$2,012.50
02/18/25	MDL	Strategize with Foley team regarding amendments to plan and disclosure statement (only participated in part of the call).	1.10	\$962.50

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02/18/25	SJM	Call with A. Uetz, M. Lee, and M. Moore regarding next steps on amended plan and disclosure statement and related issues (1.4); call with M. Lee regarding approach to liquidation analysis and plan amendments (.7).	2.10	\$1,837.50
02/18/25	SJM	Draft notice of filing of redlines of second amended plan and disclosure statement (.7); attention to filing of corrected version of same (.6).	1.30	\$1,137.50
02/18/25	SJM	Further call with Hilco and VeraCruz to review valuation and issues regarding specific properties (1.5); draft notes regarding meeting (.4).	1.90	\$1,662.50
02/18/25	SJM	Call with M. Lee, M. Moore, and Committee counsel regarding open issues on disclosure statement (.7); email to team regarding next steps in light of same (.1); emails with case team in light of Committee refusal to continue hearing and deadlines (.3); work on finalizing second amended plan and disclosure statement (.8).	1.90	\$1,662.50
02/19/25	AMUE	Analyze privileged information regarding real estate valuation (1.4); meeting with Hilco team regarding real estate valuation (1.0); follow-on work regarding liquidation analysis (1.4).	3.80	\$3,990.00
02/19/25	JCH	Prepare (.4) and file (.1) notice of withdrawal of second amended disclosure statement and notice of filing of redlines; finalize (.4) and file (.1) corrected second amended disclosure statement and related notice of filing of redlines.	1.00	\$330.00
02/19/25	MDL	Prepare corrected version of second amended disclosure statement.	0.30	\$262.50
02/19/25	MDL	Telephone conference with Hilco team and Foley team regarding property valuation issues and work product questions.	1.10	\$962.50
02/19/25	SJM	Attention to filing disclosure statement, including redlines of same.	0.80	\$700.00
02/19/25	SJM	Further call with Hilco and M. Lee regarding real property valuation issues (1.1); call with M. Lee regarding same (.2); draft update to case team regarding same (.6).	1.90	\$1,662.50

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02/20/25	AMUE	Meeting with J. Azuse regarding valuation (.3); analyze liquidation analysis issue (1.1).	1.40	\$1,470.00
02/20/25	MDL	Telephone conference with C. Moore regarding supplemental liquidation analysis.	0.10	\$87.50
02/20/25	MDL	Evaluate draft property valuation summary and impact of same on supplemental liquidation analysis.	1.10	\$962.50
02/20/25	SJM	Further call with Hilco and VeraCruz regarding property valuation issues (.6); email to case team regarding follow-up from same (.3).	0.90	\$787.50
02/21/25	AMUE	Analyze privileged issue concerning liquidation analysis.	1.30	\$1,365.00
02/21/25	MCM	Email and telephone communications with Foley team regarding liquidation analysis and disclosure statement issues.	0.60	\$555.00
02/21/25	MDL	Analyze supplemental liquidation analysis.	1.80	\$1,575.00
02/21/25	MDL	Analyze draft liquidation valuation summary.	0.60	\$525.00
02/21/25	MDL	Email exchange with C. Moore (A&M) regarding valuation issues and revised supplemental liquidation analysis.	1.10	\$962.50
02/21/25	MDL	Telephone conferences with C. Moore (A&M) regarding supplemental liquidation analysis.	0.50	\$437.50
02/21/25	MDL	Email exchange with A. Zimmerman and C. Parthum of Hilco regarding property valuations.	0.40	\$350.00
02/21/25	MDL	Telephone conference with Hilco and Foley teams regarding property valuations.	0.40	\$350.00
02/21/25	SJM	Further call with Hilco regarding finalizing valuation report.	0.20	\$175.00
02/22/25	MDL	Email exchange with C. Moore (A&M) regarding valuation considerations.	0.50	\$437.50
02/22/25	MDL	Revise supplemental liquidation analysis.	0.20	\$175.00
02/22/25	MDL	Telephone conference with C. Moore (A&M) regarding detail points in supplemental liquidation analysis.	0.40	\$350.00
02/23/25	AMUE	Finalize liquidation analysis including communications with C. Moore.	3.10	\$3,255.00

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02/23/25	MCM	Analyze alternate liquidation analysis prior to filing of same.	0.60	\$555.00
02/23/25	MDL	Analyze revised supplemental liquidation analysis.	0.60	\$525.00
02/23/25	SJM	Calls with C. Moore regarding liquidation analysis (.4); analyze issues regarding treatment of property in liquidation analysis (1.2); multiple revisions to text of liquidation analysis based on comments from M. Lee and C. Moore (1.3); email correspondence with Hilco regarding property valuation and related issue for liquidation analysis (.4); finalize liquidation analysis for filing (.5); draft notice of filing of revised liquidation analysis (.3).	4.10	\$3,587.50
02/24/25	MCM	Analyze Committee objection to second amended disclosure statement (.7); begin draft reply to same for filing on 2/26 (.7).	1.40	\$1,295.00
02/24/25	SJM	Analyze arguments in Committee objection to amended disclosure statement in order to prepare detailed chart of objections.	2.10	\$1,837.50
02/24/25	SJM	Email correspondence with Committee counsel and Verita regarding incomplete redaction of confidential information in Committee objection to disclosure statement.	0.80	\$700.00
02/25/25	MCM	Analyze issues list from prior meet and confer with Committee counsel regarding amended disclosure statement (.4); draft reply to Committee objection to second amended disclosure statement (1.5); review transcripts of prior hearings regarding disclosure statement approval and related issues and incorporate same into draft (.5); email correspondence regarding plan and disclosure statement issues (.4); further revisions to reply to Committee objection following discussion with Foley team (.5).	3.30	\$3,052.50
02/25/25	SJM	Attention to potential dates for continued disclosure statement hearing.	0.20	\$175.00
02/26/25	JCH	Revise Debtor's reply to Committee's objection to second amended disclosure statement (.2); email correspondence with Foley team regarding reply (.2); finalize and file reply (.2).	0.60	\$198.00

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02/26/25	MCM	Revise reply to Committee objection to disclosure statement and circulate to Foley team for review (1.0); further revisions following input from various parties (.4); analysis of potential continuance of disclosure statement hearing based on mediation discussions (.5); finalize and approve reply to Committee objection to disclosure statement (.7).	2.60	\$2,405.00
02/26/25	MDL	Revise reply brief in support of amended disclosure statement.	1.30	\$1,137.50
02/26/25	SJM	Work on reply in support of second amended disclosure statement.	2.60	\$2,275.00
02/27/25	MDL	Revise notice of status conference and continued disclosure statement hearing.	0.20	\$175.00
02/27/25	SJM	Email correspondence with case team regarding strategy for continuance of disclosure statement hearing (.3); call to chambers regarding available dates (.1); call to M. Plevin regarding same (.1); call to T. Schiavoni regarding same (.3); draft notice of continuance (.6).	1.40	\$1,225.00
02/28/25	SJM	Begin review of further edits needed to disclosure statement for third amendment.	0.70	\$612.50
Task Total:			154.30	\$138,566.50

**015 Executory Contracts/ Lease Issues**

02/19/25	EPK	Assess need for further extension of the lease assumption deadline as it relates to the Cathedral lease arrangements.	0.10	\$87.50
02/19/25	SJM	Email to case team regarding need to further extend CCCEB lease assumption/rejection deadline.	0.20	\$175.00
Task Total:			0.30	\$262.50

**016 General Case Strategy (includes team calls)**

02/02/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.70	\$472.50
02/03/25	AMUE	Meeting with P. Pascuzzi regarding developments in various diocese cases to inform RCBO.	1.00	\$1,050.00
02/04/25	SJM	Revise draft email to client regarding renewed mediation.	0.40	\$350.00
02/07/25	EPK	Confer with S. Moses regarding non-debtor stay issues and related strategy (.6); analyze case law input from S. Moses relating to same (.2).	0.80	\$700.00
02/10/25	EPK	Conference call with A. Uetz, M. Moore, and S. Moses to discuss JCCP 5108 coordination and automatic stay issues.	0.70	\$612.50
02/10/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$540.00
02/10/25	SJM	Prepare for meeting regarding stay issues in connection with state court litigation (.3); meeting with E. Khatchatourian, M. Moore, and A. Uetz regarding same and related issues (.6).	0.90	\$787.50
02/12/25	SJM	Analyze diocese of Rochester decision and implications for non-debtor releases.	0.40	\$350.00
02/18/25	MDL	Strategize regarding impact of property review and valuation analysis on disclosure statement and best interest test analysis.	0.20	\$175.00
02/18/25	MRL	Provide information to M. Moore regarding status of the Norwich bankruptcy case.	0.20	\$135.00
02/19/25	EPK	Foley restructuring team coordination regarding non-debtor co-defendant and tort claim analysis, including email correspondence with A. Uetz regarding same (.9); review internal work product relating to same (.2).	1.10	\$962.50
02/20/25	MDL	Participate in call with Hilco and Foley teams regarding property valuation issues.	0.60	\$525.00
02/24/25	MRL	Review pending dioceses cases to provide an update on their status to client.	1.40	\$945.00

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02/26/25	AMUE	Mediation debrief (1.4); strategize regarding upcoming hearing schedule for disclosure statement, motions to dismiss and OPF claim objection in light of Committee not agreeing to proposed stipulation for 30-day stand down (1.3).	2.70	\$2,835.00
02/26/25	MCM	Email and telephone communications with Foley team regarding go-forward strategy following mediation.	0.40	\$370.00
02/27/25	AMUE	Meeting with Foley core team to develop post-mediation strategy and action items (1.0); prepare for same (1.7); meeting with A. Cotrell regarding privacy issue (.5).	3.20	\$3,360.00
02/27/25	EPM	Preparation for call with A. Uetz, M. Moore, S. Moses, and G. Goodman regarding bankruptcy case and related insurance matters.	0.50	\$420.00
02/27/25	EPM	Conference call with A. Uetz, M. Moore, S. Moses, and G. Goodman regarding bankruptcy case and related insurance matters (partial).	0.70	\$588.00
02/27/25	GSG	Telephone conference with team regarding litigation matters, OPF and other issues.	1.00	\$1,050.00
02/27/25	MCM	Strategy call with Foley team regarding various workstreams and tasks going forward (1.0); follow-up email correspondence regarding same (.4).	1.40	\$1,295.00
02/27/25	MDL	Participate in all-hands Foley team call following mediation to strategize for case end game (only joined part of the call).	0.70	\$612.50
02/27/25	SJM	Meeting with Foley team regarding next steps in light of mediation (1.1); draft notes regarding meeting and action items (.5).	1.60	\$1,400.00
02/27/25	TND	All-hands call with Foley team on various outstanding matters.	1.10	\$880.00
02/28/25	MDL	Strategize with Foley team regarding 3/3 status conference and possible continuance of motion to dismiss hearing.	0.20	\$175.00
Task Total:			22.70	\$20,590.50

**018 Non-Bankruptcy Litigation**

02/03/25	EPK	Conference call with the Foley restructuring working group to discuss JCCP 5108 co-defendant stay issues (.7); email correspondence with M. Moore regarding analysis of master JCCP 5108 case list (.1).	0.80	\$700.00
02/03/25	EPK	Begin drafting insert for the next case management statement for JCCP 5108.	0.70	\$612.50
02/03/25	MCM	Conference call regarding JCCP 5108 proceeding and next steps.	0.50	\$462.50
02/03/25	MDL	Strategize with Foley team regarding potential state court actions against certain co-defendants.	0.70	\$612.50
02/03/25	SJM	Call with A. Uetz, M. Lee, and E. Khatchatourian regarding strategy in light of new JCCP judge approach to non-debtor stay issues.	0.70	\$612.50
02/04/25	EPK	Review email from R. Donahoo of Donahoo & Associates regarding request for meet and confer relating to claims against non-debtor defendants (.1); discussion with S. Moses regarding same and non-debtor co-defendant issues (.6); separate email correspondence with A. Ouellette regarding same (.2).	0.90	\$787.50
02/05/25	EPK	Confer with M. Moore regarding status of analysis of the JCCP 5108 master case list (.2); analyze Judge Chatterjee's CMC order requirements (.2).	0.40	\$350.00
02/05/25	MCM	Review email correspondence regarding "bucketing" of claims for JCCP 5108 purposes (.4); meeting with Foley team regarding same (.3).	0.70	\$647.50
02/06/25	EPK	Develop strategy relating to co-defendant issues in the JCCP 5108 (.2); email correspondence with A. Uetz regarding same (.2); oversee docketing of JCCP 5108 dates and deadlines and trial-scheduling items (.2); prepare for meet and confer call (.3); participate in meet and confer call with plaintiffs' and defendants' liaison counsel in the JCCP 5108 (1.0); analyze shared-insurance arrangements with RCWC and the schools (.2).	2.10	\$1,837.50
02/06/25	SJM	Attention to issues regarding filings in JCCP state court proceeding (.4); email to E. Khatchatourian regarding same (.3).	0.70	\$612.50

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02/09/25	AROU	Attention to status of JCCP 5108 and correspondence from plaintiffs' counsel regarding case management order.	0.30	\$262.50
02/09/25	EPK	Email correspondence with A. Ouellette regarding inbound inquiry from plaintiffs' counsel relating to co-defendant issues in the JCCP 5108.	0.20	\$175.00
02/10/25	AMUE	Meeting with Foley team to strategize regarding CMC report in the JCCP 5108 proceeding.	0.60	\$630.00
02/10/25	EPK	Follow up on status of internal analysis of the JCCP 5108 case list (.1); analyze case law discussing non-debtor co-defendant issues (.5).	0.60	\$525.00
02/10/25	MCM	Conference call with Foley team regarding JCCP 5108 and related issues (.5); follow-up email correspondence with J. Harrison regarding bucketing of claims (.2).	0.70	\$647.50
02/11/25	AROU	Attention to status of JCCP 5108 and correspondence from plaintiffs' counsel regarding case management order.	0.20	\$175.00
02/11/25	EPK	Draft proposed email to A. Bardos of RCBO regarding JCCP 5108 CMC order issues (.2); confer with A. Uetz and A. Ouellette regarding same (.3); email correspondence with D. Zamora of Weintraub Tobin regarding preliminary draft of JCCP 5108 CMC statement (.1); send email to A. Bardos of RCBO and R. Manns of Norton Rose Fulbright regarding representation of RCWC in the JCCP 5108 process (.2); follow-on email correspondence with R. Manns regarding same (.3); review discovery requests propounded by plaintiffs' counsel (.3).	1.40	\$1,225.00
02/11/25	MCM	Email correspondence regarding "bucketing" of claims pursuant to instructions from JCCP 5108 court.	0.30	\$277.50
02/11/25	SJM	Email to counsel for Archbishop of San Francisco regarding JCCP case management statement and non-debtor stay issues related to same.	0.20	\$175.00

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02/12/25	EPK	Email correspondence with A. Bardos of RCBO and R. Manns of Norton Rose Fulbright regarding discovery served on RCWC and representation of RCWC in the JCCP 5108 (.4); review related email correspondence from plaintiff's counsel (.4); conference call with A. Bardos and the Norton Rose Fulbright team to discuss JCCP 5108 issues and representation of non-debtor co-defendants (.4); post-call email correspondence with A. Uetz regarding same (.1).	1.30	\$1,137.50
02/13/25	AMUE	Communication with Foley litigation team necessary to provide advice regarding CMC report in light of state court counsel proceeding on cases against non-debtor defendants (.4); provide advice regarding same (.3).	0.70	\$735.00
02/13/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools.	2.40	\$2,100.00
02/13/25	EPK	Email correspondence with counsel for non-debtor co-defendants regarding JCCP 5108 matters and case list (.4); analyze non-debtor co-defendants' information, including analysis of refined co-defendant list and claims (1.1); call with D. Zamora of Weintraub Tobin to discuss same and upcoming JCCP 5108 CMC issues (.4); email correspondence with M. Moore regarding further analysis of non-debtor co-defendant cases and claims (.3); call with A. Ouellette to discuss procedural history for coordinated actions (.2); post-call email correspondence with A. Ouellette and T. Carlucci regarding analysis of same and proposed discussion with counsel to RCWC (.3).	2.70	\$2,362.50
02/13/25	JCH	Compare Foley's spreadsheet of affiliated co-defendant cases against JCCP Bucket 2 list.	1.00	\$330.00
02/13/25	MCM	Work on "bucketing" of claims in connection with JCCP 5108 and directives of coordination judge.	0.40	\$370.00
02/13/25	TFCA	Numerous emails with A. Ouellette regarding responding to Norton Rose request.	0.30	\$412.50
02/14/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools.	0.90	\$787.50

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02/14/25	KAFA	Compile claim information for JCCP 5108 lawsuits.	5.30	\$2,385.00
02/17/25	MCM	Email correspondence and analysis regarding "bucketing" of claims for purposes of JCCP and continuation of cases involving non-debtors.	0.40	\$370.00
02/18/25	AROU	Attention to motion to set trial date in Plaintiff J.S. case pending in JCCP 5108.	0.30	\$262.50
02/18/25	AROU	Call with RCWC's counsel regarding JCCP 5108.	0.80	\$700.00
02/18/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools.	2.70	\$2,362.50
02/18/25	EPK	Prepare chart of JCCP 5108 coordinated actions to be sent to counsel for RCWC and the schools (.2); email correspondence with R. Manns and J. Leito of Norton Rose Fulbright regarding same (.5); email correspondence with D. Zamora of Weintraub Tobin regarding draft of JCCP 5108 joint case management statement (.1); draft RCBO's positional statement to be included in same (.5); conference call with Foley and Norton Rose Fulbright litigation teams regarding JCCP 5108 issues (.9); coordinate with Foley restructuring team and A. Ouellette regarding same (.4); review motion filed by Donahoo firm relating to RCWC state court action (.1).	2.70	\$2,362.50
02/18/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	4.20	\$1,890.00
02/18/25	TFCA	Review spreadsheet and codes to prepare for call with Norton Rose (.5); telephone call with Norton Rose, E. Khatchatourian, and A. Ouellette regarding transition regarding 5108 for RCWC (.8).	1.30	\$1,787.50
02/19/25	AROU	Attention to JCCP 5108 orders governing discovery procedures.	1.40	\$1,225.00

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02/19/25	EPK	Email correspondence with A. Bardos regarding Judge Chatterjee's JCCP 5108 CMC order and non-debtor co-defendant issues (.3); continue drafting RCBO's insert for the JCCP 5108 joint case management statement (1.9); email correspondence with Foley restructuring team regarding comments to same (.1); email correspondence with R. Manns of Norton Rose Fulbright and A. Uetz regarding schools actions and JCCP 5108 CMC (.7); email correspondence with D. Zamora of Weintraub Tobin regarding preliminary draft of RCBO's insert for the JCCP 5108 joint CMC statement (.2).	3.20	\$2,800.00
02/19/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	0.90	\$405.00
02/20/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools and compile pleadings and discovery.	3.20	\$2,800.00
02/20/25	EPK	Conference call with R. Manns and J. Leito of Norton Rose Fulbright to discuss RCWC/schools co-defendant actions and JCCP 5108 matters (.7); coordinate with A. Ouellette and K. Farrar regarding pleadings to be provided to NRF team (.8); review analysis of claims and causes of action for non-debtor co-defendants prepared by A. Ouellette (.3); email correspondence with J. Leito of NRF regarding schools cases, service-related issues, and JCCP 5108 scheduling issues (.4); email correspondence with A. Bardos regarding status of JCCP 5108 actions and anticipated developments in same (.1).	2.30	\$2,012.50
02/20/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	3.10	\$1,395.00
02/20/25	MCM	Analysis of bucketing of claims pursuant to JCCP coordination judge requests.	0.50	\$462.50
02/21/25	AROU	Attention to JCCP 5108 case management conference statement.	0.30	\$262.50
02/21/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools and correspond with counsel for Roman Catholic Welfare Corporation.	0.80	\$700.00

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02/21/25	EPK	Email correspondence with R. Manns and J. Leito of NRF regarding comments to the JCCP 5108 joint case management statement and RCWC's diligence requests (.6); comment on proposed revisions to the statement (.5); review chart summarizing school cases and JCCP 5108 "buckets" (.2); email correspondence with liaison counsel D. Zamora of Weintraub Tobin and other defense counsel regarding revisions to the case management statement and new lists received from R. Simons (.6); short call with J. Leito to discuss next week's JCCP 5108 CMC (.2); post-call email correspondence with J. Leito regarding confidentiality issues and next week's JCCP 5108 CMC (.5); email correspondence with R. Simons regarding new list of JCCP 5108 cases (.2); review diligence requests received and provided to J. Leito of NRF (.2).	3.00	\$2,625.00
02/21/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	0.50	\$225.00
02/21/25	TFCA	Emails with N. Rose regarding clarifying current status of various cases (.2); emails with A. Ouellette and E. Khatchatourian (.2).	0.40	\$550.00
02/24/25	AROU	Attention to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation or affiliated schools and correspond with counsel for Roman Catholic Welfare Corporation.	0.50	\$437.50
02/24/25	EPK	Review as-submitted JCCP 5108 joint case management statement (.2); email correspondence with A. Bardos regarding this week's JCCP 5108 CMC (.2).	0.40	\$350.00
02/24/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	2.60	\$1,170.00
02/25/25	AROU	Compile documents relating to JCCP 5108 lawsuits involving Roman Catholic Welfare Corporation.	1.40	\$1,225.00
02/25/25	EPK	Further review of the 150-page joint JCCP 5108 case management statement (.3); email correspondence with D. Zamora of Weintraub Tobin regarding trial case lists (.2); confer with K. Farrar and A. Ouellette regarding pleadings and documents to be sent to NRF team (.2).	0.70	\$612.50

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02/25/25	KAFA	Compile claim information and documentation for JCCP 5108 lawsuits.	4.10	\$1,845.00
02/26/25	AROU	Respond to correspondence from Manly firm regarding JCCP 5108 cases.	0.30	\$262.50
02/26/25	EPK	Review CMC order requirements and positional statements of each diocesan debtor set forth in the 150-page joint JCCP 5108 case management statement (.7); attend the monthly case management conference in the JCCP 5108 (1.2); email correspondence with the Foley restructuring team regarding the results of the conference (.3); email correspondence with Manly firm legal assistant regarding five-year rule issue (.2).	2.40	\$2,100.00
02/27/25	AROU	Attention to correspondence from Manly firm regarding JCCP 5108 cases.	0.10	\$87.50
02/27/25	AROU	Attention to status of cases involving the Roman Catholic Welfare Corporation.	0.60	\$525.00
02/27/25	EPK	Email correspondence with Manly firm regarding proposed stipulation relating to five-year rule (.1); confer with A. Ouellette regarding same (.1); email correspondence with counsel for RCWC, R. Manns and C. Pelham of NRF, regarding JCCP 5108 appearances for the schools (.3); confer with A. Ouellette regarding same (.2).	0.70	\$612.50
02/28/25	AROU	Call and correspond with counsel for Roman Catholic Welfare Corporation.	0.60	\$525.00
02/28/25	EPK	Email correspondence with C. Pelham of NRF regarding RCWC issues in the JCCP 5108 process.	0.20	\$175.00
Task Total:			74.30	\$57,072.50

**020 Retention/Billing/Fee Applications for Debtor Professionals**

02/03/25	TND	Call with S. Moses on Fifth Interim Fee Application (.5); correspond with E. Mazzocco on additional information needed for application (.2).	0.70	\$560.00
02/04/25	TND	Communications with E. Mazzocco on insurance section of Fifth Interim Fee App (.1); review information needed for application (.2).	0.30	\$240.00

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02/05/25	TND	Further preparation of Foley's Fifth Interim Fee App (3.8); communications with A&M regarding its Fifth Interim Application (.2); email to J. Breall on hearing date for Fifth Interim Applications (.1).	4.10	\$3,280.00
02/06/25	JCH	Prepare chart of fees billed by certain timekeepers on Foley's interim fee applications and email same to T. Dolcourt.	0.50	\$165.00
02/06/25	TND	Further drafting of Fifth Interim Fee Application (4.2); email communications with Foley team on same (.2).	4.40	\$3,520.00
02/10/25	EPM	Summarize fee statements from September - December, 2024 (1.7); draft summary of work in this time period for fee statement (1.8).	3.50	\$2,940.00
02/10/25	MDL	Analyze fifth interim fee application request for allowance of fees incurred by specific timekeepers.	0.10	\$87.50
02/10/25	SJM	Work on narratives and case update for Foley fifth interim fee application.	4.60	\$4,025.00
02/10/25	TND	Revise information on insurance task code for inclusion in Fifth Interim Fee Application (.4); communications with team on review of timekeepers under 15 hours for Application (.2).	0.60	\$480.00
02/11/25	AMUE	Provide advice to T. Dolcourt regarding fifth interim fee application.	0.60	\$630.00
02/11/25	JCH	Prepare certificates of no objection to Foley and A&M monthly fee statements (.5); prepare Uetz Declaration in support of Foley Fifth Interim Fee Application (.2).	0.70	\$231.00
02/11/25	SJM	Call with T. Dolcourt and A. Uetz regarding finalizing fifth interim fee application (.2); email to Committee counsel regarding schedule for hearing on fee applications (.1).	0.30	\$262.50
02/11/25	TND	Further revisions to Foley's Fifth Interim Fee Application (2.6); call with A. Uetz and S. Moses on same (.2); communications with A&M team on their application (.1).	2.90	\$2,320.00
02/12/25	JCH	File certificates of no objection to Foley and A&M monthly fee statements.	0.50	\$165.00

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02/12/25	TND	Revise A&M interim fee application (.7); communications with A&M on same (.2); emails with J. Breall on hearing date for next applications (.2); update Foley fee application with new docket entries and hearing date (.2).	1.30	\$1,040.00
02/13/25	TND	Revise Foley Fifth Interim Fee Application to incorporate significant comments from A. Uetz.	3.40	\$2,720.00
02/14/25	JCH	Final review of Foley Fifth Interim Fee Application to confirm amounts are correct (.5); finalize (.5) and file (.3) Foley and A&M Fifth Interim Fee Applications and Declarations in support; review Omnibus Notice of Hearing on interim fee applications (.2).	1.50	\$495.00
02/14/25	SJM	Work on Foley interim fee application.	1.40	\$1,225.00
02/14/25	SJM	Assist with finalizing Foley interim fee application (1.1); email to A. Uetz regarding options for addressing Committee's potential objection to Hilco ordinary course retention (.6).	1.70	\$1,487.50
02/14/25	TND	Finalize Fifth Interim Fee Application for Foley & Lardner.	1.60	\$1,280.00
02/17/25	TND	Review issues related to Hilco retention and connections check (.3); call with E. Mazzocco on billing matters (.1).	0.40	\$320.00
02/18/25	SJM	Prepare application to employ Hilco as a professional.	3.40	\$2,975.00
02/19/25	TND	Further work on January fee statement for Foley to ensure compliance with U.S. Trustee guidance.	0.80	\$640.00
02/20/25	SJM	Email correspondence with other professionals and U.S. Trustee regarding LEDES files.	0.20	\$175.00
02/20/25	TND	Further preparation of information for January fee statement to ensure compliance with U.S. Trustee guidelines.	2.30	\$1,840.00
02/24/25	SJM	Revise Hilco engagement letter in light of change to 327 employment (.3); revise draft employment application and supporting papers (.3); email to A. Bardos regarding same (.2).	0.80	\$700.00

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02/24/25	TND	Further preparation of January fee statement to ensure compliance with U.S. Trustee guidelines (1.9); correspondence with S. Moses on potential Hilco 327 retention (.3).	2.20	\$1,760.00
02/25/25	TND	Email correspondence with C. Moore on January filing for A&M (.2); email to A. Uetz on January fee statement (.1).	0.30	\$240.00
02/26/25	JCH	Prepare draft of Foley's monthly fee statement for January 2025.	0.50	\$165.00
02/28/25	AMUE	Provide advice regarding Foley's monthly fee statement.	1.00	\$1,050.00
02/28/25	JCH	Finalize (.7) and file (.1) Foley monthly fee statement for January 2025.	0.80	\$264.00
02/28/25	SJM	Revise application for Hilco retention in light of filed Committee opposition (.2); email to client regarding same (.1); email to Hilco regarding next steps on employment (.4).	0.70	\$612.50
02/28/25	TND	Finalize Foley January fee statement for filing.	0.90	\$720.00
		Task Total:	49.00	\$38,615.00

**021 Retention/Fee Applications: Ordinary Course Professionals**

02/03/25	TND	Call with Hilco counsel on engagement letter (.2); revise letter based on call (.3); correspondence with A. Uetz on same (.2).	0.70	\$560.00
02/04/25	AMUE	Finalize engagement letter with Hilco and communication with A. Bardos regarding same.	0.70	\$735.00
02/04/25	TND	Communications with Hilco on engagement letter revisions.	0.20	\$160.00
02/06/25	TND	Email communications with Hilco and RCBO teams on finalized engagement letter (.3); finalize documents for Hilco to execute for OCP retention (.3).	0.60	\$480.00
02/10/25	TND	Communications with Foley team on Hilco OCP retention (.2); review documents from Hilco (.1).	0.30	\$240.00

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02/12/25	AMUE	Review email received from B. Weisenberg regarding Hilco retention (.2) and follow up regarding same (.4); communication with A. Bardos and M. Kemner regarding same (.3).	0.90	\$945.00
02/12/25	JCH	Finalize (.4) and file (.1) Notice of Supplemental OCP Retention of Hilco Real Estate, LLC.	0.50	\$165.00
02/12/25	SJM	Analyze approach to Hilco retention in light of Committee position (.4); email to A. Uetz regarding same (.2).	0.60	\$525.00
02/12/25	TND	Finalize Hilco OCP retention paperwork (.3); correspondence with Foley team on Committee objection to same (.2).	0.50	\$400.00
02/20/25	TND	Email to A. Uetz and M. Lee on retention of additional OCP professional.	0.10	\$80.00
Task Total:			5.10	\$4,290.00

**022 Retention/Fee Applications: Other Professionals**

02/01/25	TND	Review Newsome Interim Fee Application (.2); correspondence with R. Newsome regarding same (.1).	0.30	\$240.00
02/10/25	TND	Review information from A. Fernandez regarding Gallagher application.	0.20	\$160.00
02/13/25	JCH	Email correspondence with T. Dolcourt regarding mediator fee applications to be filed.	0.50	\$165.00
02/13/25	TND	Revise Gallagher Group interim fee statement (1.3); finalize Newsome interim fee application (.2); communications with R. Newsome on same (.2); review Sontchi interim fee application (.2); communications with C. Syzmanski on same (.2).	2.10	\$1,680.00
02/14/25	JCH	Finalize (.5) and file (.3) 3 mediator fee applications; calendar response deadline and hearing on interim fee applications (.2).	1.00	\$330.00
02/14/25	SJM	Coordinate with Committee local counsel on notice of fee applications (.4); draft omnibus notice (.8).	1.20	\$1,050.00

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02/14/25	SJM	Email to client regarding payment of monthly fee statements (.4); email to client regarding payment of Committee member expenses (.3).	0.70	\$612.50
02/17/25	TND	Email to mediators and staff with their as-filed Interim Fee Applications and Notice of Hearing.	0.30	\$240.00
02/28/25	JCH	Prepare chart of interim payments due to all case professionals and email same to S. Moses.	0.50	\$165.00
		Task Total:	6.80	\$4,642.50

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

02/04/25	EPK	Review Rule 2015.3 reporting requirements.	0.10	\$87.50
02/05/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding preparation of the third Rule 2015.3 report for CTN (.2); email correspondence with counsel for CTN, W. Smith of Binder & Malter, regarding draft of report for CTN's review and approval (.1).	0.30	\$262.50
02/07/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding the preliminary draft of the third CTN Rule 2015.3 report (.2); brief review of preliminary draft of CTN periodic report and exhibits (.2); email correspondence with W. Smith of Binder & Malter and D. Cassidy of Alston & Bird regarding review and approval of the next CTN report (.1).	0.50	\$437.50
02/10/25	EPK	Email correspondence with counsel for CTN, W. Smith of Binder & Malter, regarding comments to the third CTN Rule 2015.3 report.	0.10	\$87.50
02/11/25	EPK	Review updated and client-approved Rule 2015.3 report for CTN.	0.10	\$87.50
02/12/25	EPK	Review proposed filing version of the third CTN Rule 2015.3 report (.1); email correspondence with A. Bardos regarding same (.1).	0.20	\$175.00

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02/14/25	EPK	Final review of third CTN Rule 2015.3 report (.2); email correspondence with J. Harrison regarding preparation of same for filing on February 18, 2025 (.1); email correspondence with D. Cassidy of Alston & Bird to confirm approval of CTN report for filing (.1).	0.40	\$350.00
02/17/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding preliminary draft of the January 2025 MOR.	0.20	\$175.00
02/18/25	EPK	Oversee filing and service of the third CTN Rule 2015.3 report (.3); review the January 2025 MOR package prepared by VeraCruz (.3); provide feedback on same to A. Bardos of RCBO and D. Flanagan of VeraCruz (.2); follow-on email correspondence with D. Flanagan and RCBO team (.2).	1.00	\$875.00
02/20/25	EPK	Review proposed filing version of the January 2025 MOR (.2); email correspondence with A. Bardos regarding final approval of same for filing (.1).	0.30	\$262.50
02/21/25	EPK	Email correspondence with J. Harrison regarding filing and service of the January 2025 MOR.	0.20	\$175.00
02/21/25	JCH	File monthly operating report for January 2025.	0.20	\$66.00
Task Total:			3.60	\$3,041.00

**026 Unsecured Creditor Issues/Communications/Meetings**

02/04/25	AMUE	Prepare for (.4) and attend (.4) meeting with B. Weisenberg regarding mediation.	0.80	\$840.00
02/04/25	MDL	Evaluate potential stipulation on OPF voting status.	0.10	\$87.50
02/14/25	AMUE	Communications with B. Weisenberg regarding meet and confer on amended disclosure statement.	0.50	\$525.00
02/17/25	MCM	Email correspondence with Committee counsel regarding amended claims and potential stipulation as to claimant information and impact on solicitation (.3); analysis of same (.3).	0.60	\$555.00

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02/18/25	MDL	Telephone conference with Lowenstein (J. Prol, B. Weisenberg) regarding points of objection to draft disclosure statement.	0.90	\$787.50
02/21/25	AMUE	Meeting with B. Weisenberg regarding mediation.	0.30	\$315.00
		Task Total:	3.20	\$3,110.00

**027 Real Estate and Real Property Issues**

02/11/25	SJM	Review edit to NDA.	0.20	\$175.00
02/11/25	TND	Review correspondence from real estate consultants including NDA matters.	0.30	\$240.00
02/12/25	TND	Review executed NDAs with real estate consultants.	0.20	\$160.00
		Task Total:	0.70	\$575.00

**028 Tort Claims**

02/25/25	EPK	Assess co-defendant liabilities for abuse claims that have been asserted against RCBO's estate.	0.20	\$175.00
02/26/25	KAFA	Research regarding John Roe 415 (.5); meeting with J. Anton and K. Hunt regarding RCBO/Diocese of Oakland litigation files (.6).	1.10	\$495.00
		Task Total:	1.30	\$670.00

**031 Insurance Issues (coverage, includes adversary proceeding)**

02/03/25	AMUE	Review multiple emails received from counsel for insurers regarding requests for information concerning proofs of claim (.5) and outline strategy to respond to same without breaching attorney-client privilege (1.0); finalize approval for production of documents concerning discovery in state court litigation involving one claimant (.6).	2.10	\$2,205.00
02/03/25	AMUE	Email to T. Gallagher and insurers regarding requests for information.	0.40	\$420.00

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02/03/25	EPM	Prepare for conference call regarding discovery status (.6); conference call with E. Ridley and M. Roberts regarding document review and discovery status (.6); draft correspondence to insurers regarding forthcoming document production (.6); review operative protective orders (.7); review status of previously executed confidentiality agreements (.6); email correspondence regarding previously-produced documents (.3).	3.40	\$2,856.00
02/03/25	EPM	Prepare for call regarding response to insurers' document requests (.8); conference call with A. Uetz, M. Moore, and E. Ridley regarding insurers' document and claims analysis requests (1.0).	1.80	\$1,512.00
02/03/25	ERR	Review issues related to funnel of claims analysis and production of materials regarding abuse case.	0.60	\$660.00
02/03/25	ERR	Review status of production.	0.70	\$770.00
02/03/25	KAFA	Analysis of prior client document collections/productions/discovery and clergy III collections/litigation/discovery to determine any additional potential documents to produce pursuant to insurers' document requests (3.3); call with E. Mazzocco regarding same (.3).	3.60	\$1,620.00
02/03/25	MCM	Email and telephone correspondence regarding insurer discovery requests on claim information (.6); analysis of claim funnel requests (.5).	1.10	\$1,017.50
02/03/25	MR	Attend discovery strategy call with E. Ridley and E. Mazzocco (.6); email and telephone communications with E. Mazzocco regarding discovery issues in relation to Judge Corley's January 16, 2025 Order (.3); coordinate production of documents to insurer defendants in insurance coverage action (.3); draft set of Requests for Production to CIGA in insurance coverage action (1.2).	2.40	\$1,908.00
02/04/25	AMUE	Revisions to proposed response to insurers regarding request for information concerning proofs of claim (.3); follow-up email exchange with T. Schiavoni (.2).	0.50	\$525.00

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02/04/25	EPM	Revise and serve requests for production to certain insurers (1.9); correspondence with Fidelidade counsel regarding document discovery and Fidelidade covered claims (.4).	2.30	\$1,932.00
02/04/25	ERR	Edit discovery requests to insurers and follow-up meet and confer with insurers regarding production.	1.50	\$1,650.00
02/04/25	ERR	Review communication regarding funnel of claims for insurers' request in discovery.	0.40	\$440.00
02/04/25	KAFA	Analysis of collected documents to identify potential documents for review and possible production in response to insurer document requests (.5); assist with preparation of abuse case discovery documents to produce to insurers (.3).	0.80	\$360.00
02/04/25	MCM	Analysis of claim information requests from insurer counsel (.6); prepare response and attachments for Foley team for review (.6); email correspondence with insurers and mediators regarding same (.3).	1.50	\$1,387.50
02/04/25	MR	Draft email communications to various insurer defendants in insurance coverage action regarding requests for meet and confer on document productions (.4); coordinate further production of documents in insurance coverage action (.4); revise set of Requests for Production to CIGA (.6).	1.40	\$1,113.00
02/05/25	AMUE	Review information from Foley team regarding outstanding insurance discovery matters in order to comply with Judge Corley's directive that written discovery be completed (1.2) and provide strategy direction to Foley team regarding same (.4).	1.60	\$1,680.00
02/05/25	EPM	Serve document production (.2); preparation for conference call with J. Breall regarding status of document discovery (.4).	0.60	\$504.00
02/05/25	ERR	Review status of discovery and questions served against insurers.	0.50	\$550.00

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02/05/25	KAFA	Analysis of collected documents to identify potential documents for review and possible production in response to insurer document requests (.5); finalization of production of abuse case discovery materials (.2); update document production log (.1); organize RCBO's discovery with the insurers (.3).	1.10	\$495.00
02/05/25	MCM	Follow up regarding request for claim information from certain insurers and related issues.	0.50	\$462.50
02/05/25	MR	Further email communications to insurer defendants in insurance coverage action regarding meet and confer requests (.2); revise, finalize and serve set of requests for production on CIGA (.3).	0.50	\$397.50
02/06/25	EPM	Emails with insurers regarding status of unredacted proof of claim productions.	0.60	\$504.00
02/06/25	ERR	Review follow-up to insurers regarding production.	0.50	\$550.00
02/06/25	KAFA	Analysis of proof of claim production and determine additional POC's to produce (1.0); download, analysis and organization of updated Survivor Claims register and newly filed late POC's received from KCC (.3); analysis of collected documents to identify potential documents for review and possible production in response to insurer document requests (1.2).	2.50	\$1,125.00
02/06/25	MCM	Email correspondence regarding follow-up insurer claim information requests (.3); email correspondence confirming execution of necessary documentation to receive unredacted proofs of claim (.3); work on issues in connection with reconciliation of claim productions to insurer parties (.6).	1.20	\$1,110.00
02/06/25	MR	Draft further communications to multiple insurer defendants regarding timing of outstanding insurer document productions and previous requests for meet and confer discussions.	0.40	\$318.00

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02/07/25	EPM	Analysis of protective orders governing various documents produced in bankruptcy, insurance, and JCCP 5108 proceedings (1.0); review depositions taken in underlying abuse case (1.6); conference call with J. Breall regarding status of document productions (.4).	3.00	\$2,520.00
02/07/25	ERR	Review status of discovery production.	0.40	\$440.00
02/07/25	MCM	Conference call with counsel for certain insurers regarding claims analysis and related issues (.5); email correspondence with certain insurers regarding insurance assignment language from other cases (.3); analysis of claims issues raised by insurers (.4).	1.20	\$1,110.00
02/07/25	MR	Attend telephone call with E. Mazzocco and J. Breall regarding status of and strategy for document productions from RCBO to insurer defendants and insurance coverage action.	0.40	\$318.00
02/08/25	ERR	Review status of discovery responses.	0.30	\$330.00
02/10/25	EPM	Analysis of outstanding proofs of claim to be produced (.4); analyze and summarize letter from Westport regarding discovery requests (1.1); conference call with M. Roberts regarding outstanding discovery tasks and strategy related thereto (1.1); draft summary of same for E. Ridley's review (.3).	2.90	\$2,436.00
02/10/25	ERR	Review status of meet and confer communications regarding insurer productions.	0.60	\$660.00
02/10/25	MR	Strategize with E. Mazzocco regarding identification of documents for potential production to insurer defendants in insurance coverage action, per Court's January 17, 2025 Order.	1.10	\$874.50
02/11/25	EPM	Attention to insurance document review staffing.	0.20	\$168.00
02/11/25	MR	Draft additional follow-up communications to counsel for insurers regarding meet and confer requests (.2); review documents to assess potential materials for production to insurer defendants in insurance coverage action (.9).	1.10	\$874.50
02/11/25	MRL	Confer with E. Mazzocco regarding reviewing certain documents.	0.20	\$135.00

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02/12/25	MCM	Email correspondence regarding insurer requests for information on claims analysis.	0.30	\$277.50
02/12/25	MR	Review additional documents to identify potentially responsive materials for production to insurers in insurance coverage action (1.0); draft summary of meet and confer correspondences with insurers' counsel (.3).	1.30	\$1,033.50
02/13/25	EPM	Conference call with M. Roberts regarding upcoming document review (.4); review M. Roberts' summary of documents to review in preparation for conference call (.1).	0.50	\$420.00
02/13/25	ERR	Edit brief in response to Committee brief on bad faith claims.	1.20	\$1,320.00
02/13/25	MR	Create plan for continuation of document review in insurance coverage action (.6); review documents for responsiveness to insurers' requests in relation to same (1.3).	1.90	\$1,510.50
02/13/25	MRL	Email correspondence with M. Roberts regarding reviewing insurance documents.	0.10	\$67.50
02/14/25	AMUE	Provide advice regarding open issues on discovery.	0.80	\$840.00
02/14/25	EPM	Discussions with M. Roberts regarding upcoming document review.	0.30	\$252.00
02/14/25	ERR	Review status of meet and confer communications with insurers.	0.50	\$550.00
02/14/25	MR	Additional follow-up email communications with counsel for insurers regarding meet and confer discussions related to document production (.3); attend call with M. Rofaeil regarding review of documents for potential responsiveness to requests for production from insurers in insurance coverage action (.2); review transcript of January 16, 2025 hearing in insurance coverage action, in preparation for meet and confer calls with insurers' counsel (.2); prepare for and attend M&C call with counsel for U.S. Fire (.9); review documents for potential responsiveness to requests for production from insurers (.5).	2.10	\$1,669.50

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02/14/25	MRL	Confer with M. Roberts regarding reviewing documents to produce to the insurers (.3); analyze documents to make a production to the insurers (2.2).	2.50	\$1,687.50
02/17/25	AMUE	Review privileged summary of mediation meeting with insurers and mediators (.4) and follow-up communications with Foley team to prepare for mediation (.8); finalize client leadership strategy memorandum regarding same (.5).	1.70	\$1,785.00
02/17/25	EPM	Internal discussions regarding insurer document production.	0.40	\$336.00
02/18/25	EPM	Meet and confer call with CNA regarding discovery status (.8); preparation for same (.3); meet and confer call with Lloyd's regarding discovery status (.6).	1.70	\$1,428.00
02/18/25	MR	Prepare for meet and confer calls with counsel for CNA and Lloyd's in insurance coverage action by reviewing prior written discovery and summarizing outstanding disputes over document productions (1.5); attend meet and confer call with CNA (.8); M&C call with Lloyd's (.6).	2.90	\$2,305.50
02/19/25	EPM	Plan scope and strategy for upcoming document review (1.0); analyze draft agreement with captive insurer (.3).	1.30	\$1,092.00
02/20/25	EPM	Review repositories of documents to be considered for responsiveness and possible production (1.4); analysis of claims pertaining to Fidelidade (.2); analysis of proofs of claim to be included in supplemental document production (.8); conference call with M. Schachte regarding same (.2); review policy limits demand letters to various insurers (.2).	2.80	\$2,352.00
02/20/25	MCM	Analyze issues regarding information requests from insurers as to proofs of claim.	0.50	\$462.50
02/20/25	MR	Prepare for meet and confer call with counsel for Travelers in insurance coverage action by reviewing prior written discovery and summarizing outstanding disputes over document productions (.6); attend meet and confer call with Travelers (.5).	1.10	\$874.50

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02/21/25	EPM	Review summary of document collection (.9); conference with M. Roberts regarding document review (.6); review letter from Westport regarding document requests (.5); meet and confer call with Westport regarding document requests (.5); strategize with E. Ridley regarding policy limits demand letters (.2); emails with case team regarding same (.3); draft summary of strategy for document review (.5).	3.50	\$2,940.00
02/21/25	ERR	Review policy limit demands from individual claimant and review response thereto.	1.00	\$1,100.00
02/21/25	MCM	Analyze issues regarding information requests from insurers as to proofs of claim.	0.50	\$462.50
02/21/25	MR	Communicate with E. Mazzocco regarding continued strategy for identifying materials responsive to requests for production from insurers in insurance coverage action (.6); perform high-level review of document production received from Westport (.4); prepare for meet and confer call with counsel for Westport in insurance coverage action by reviewing prior written discovery and summarizing outstanding disputes over document productions (.5); attend meet and confer call with Westport (.7).	2.20	\$1,749.00
02/22/25	MR	Draft summary of meet and confer calls with insurers to date in insurance coverage action.	0.40	\$318.00
02/23/25	EPM	Review documents for responsiveness and possible production.	1.70	\$1,428.00
02/24/25	EPM	Review documents for relevance and possible production (2.3); draft summary of discovery status (1.5); analysis of policy limits demand letters (.5); discussions regarding proof of claim productions (.2).	4.50	\$3,780.00
02/24/25	ERR	Review policy information request.	0.50	\$550.00
02/24/25	MR	Communicate with counsel for Travelers regarding document production received from Travelers.	0.10	\$79.50
02/24/25	MRL	Analyze documents to make a production to the insurers.	0.90	\$607.50

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02/25/25	EPM	Conference call with M. Roberts regarding document discovery (.4); finalize and serve proof of claim productions, including internal discussions regarding same (1.1).	1.50	\$1,260.00
02/25/25	JRBL	Communications with E. Ridley regarding Ordinary Mutual coverage years and limitations.	0.50	\$687.50
02/25/25	KAFA	Analysis of Ordinary Mutual coverage and involvement in the state court actions (.3); coordinate production of proofs of claim to be served on counsel for American Home Assurance Company (.5).	0.80	\$360.00
02/25/25	MR	Review documents for responsiveness to requests for production served on RCBO by insurers in insurance coverage action (1.3); communicate with E. Mazzocco regarding same and regarding strategy for identifying additional potentially responsive documents (.4).	1.70	\$1,351.50
02/26/25	EPM	Quality control review of documents for relevance and privilege (.3); draft summary of discovery status (1.3).	1.60	\$1,344.00
02/26/25	ERR	Telephone call with Mark Plevin regarding mediation and upcoming hearing.	0.50	\$550.00
02/26/25	MR	Review additional documents for responsiveness to requests for production served by insurers in insurance coverage action (4.1);communicate with E. Mazzocco regarding status of and strategy for document review and regarding joint status update ordered by Judge Corley for March 3, 2025 submission (.4).	4.50	\$3,577.50
02/27/25	EPK	Brief analysis of shared insurance issues relating to RCWC.	0.10	\$87.50
02/27/25	EPM	Conference call with E. Ridley regarding insurance tasks (.3); correspondence with insurance counsel regarding discovery matters (.2); quality control review of documents for responsiveness and privilege (.4); draft status update to Judge Corley regarding insurance coverage action discovery (4.2).	5.10	\$4,284.00
02/27/25	ERR	Review case status and strategy.	0.50	\$550.00

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02/27/25	ERR	Telephone call with J. Breall regarding American Home request for information and materials.	0.40	\$440.00
02/27/25	ERR	Edit letter to U.S. Fire regarding claim of no policy.	0.60	\$660.00
02/27/25	ERR	Review status of insurance claims and production.	0.50	\$550.00
02/27/25	KAFA	Analysis of additional client documents and discovery to determine any additional potential documents to produce pursuant to insurers' document requests (1.1); calls with M. Roberts and E. Mazzocco to discuss prior productions and review of remaining client documents (.4); research Clergy III protective order (.4).	1.90	\$855.00
02/27/25	MR	Communicate with E. Mazzocco regarding status of document review and draft of March 3, 2025 joint status report ordered by Judge Corley (.5); draft portions of status report (1.1); review additional documents for responsiveness to requests for production served by insurers in insurance coverage action (3.3).	4.90	\$3,895.50
02/28/25	EPM	Quality control review of documents slated for production (2.8); revise joint status update regarding discovery in coverage action (.5); internal discussions regarding document production logistics (.5); coordinate with J. Breall regarding document productions (.3); respond to insurers regarding policy limits demand letters (.2).	4.30	\$3,612.00
02/28/25	ERR	Edit joint statement of case status.	0.80	\$880.00
02/28/25	ERR	Review status of diocese production and response of policy limit information request.	0.80	\$880.00
02/28/25	KAFA	Prepare documents for production to insurers (1.3); updates to document production log (.4); call with E. Mazzocco regarding insurer productions and executed confidentiality agreements (.3).; communications with M. Schachte about document productions (.5).	2.50	\$1,125.00

02/28/25	SJM	Review update on bankruptcy case status for filing with District Court (.2); email to E. Mazzocco regarding comments to same (.1).	0.30	\$262.50
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	Task Total:	118.90	\$98,428.00
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**032 Rule 2004 Motions/Discovery/Subpoenas**

02/11/25	MDL	Email correspondence with VeraCruz and A. Bardos regarding BRG financial information requests.	0.30	\$262.50
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02/11/25	MDL	Telephone conference with M. Roberts to discuss BRG financial information requests.	0.20	\$175.00
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02/11/25	MR	Communicate with M. Lee (.2) and A. Uetz (.2) to evaluate requests from BRG to VeraCruz regarding RCBO's financial statements.	0.40	\$318.00
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02/12/25	MDL	Correspondence with B. Weisenberg (Lowenstein) regarding BRG financial information requests.	0.30	\$262.50
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02/18/25	JMT	Confer with M. Moore regarding necessary discovery (.4); confer with M. Mitchem and analyze potential discovery requests (.7).	1.10	\$962.50
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02/21/25	JCH	Prepare information related to Policy Limit Requests received from individual plaintiffs.	0.50	\$165.00
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02/21/25	MDL	Email exchange with J. Bair (Burns Bair) regarding previously-produced documents.	0.10	\$87.50
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02/23/25	JMT	Edit discovery requests (.4) and 2004 motion (.7); confer with team regarding same (.4).	1.50	\$1,312.50
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02/24/25	JCH	Create file of emails related to Policy Limit Requests received from individual plaintiffs (.2); create spreadsheet tracking policy limit requests received (.5).	0.70	\$231.00
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02/27/25	EPK	Email correspondence with D. Flanagan of VeraCruz and K. Farrar regarding January 2025 MOR supplements to be sent to the BRG team.	0.20	\$175.00
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02/27/25	JMT	Confer with team regarding discovery strategy (.6); revise discovery requests (1.1).	1.70	\$1,487.50
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02/27/25	KAFA	Work on production of additional MOR supplemental documents to BRG.	0.20	\$90.00
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02/27/25	MCM	Attention to discovery issues regarding the Committee (.3); meeting with M. Thomas regarding same (.3).	0.60	\$555.00
02/27/25	MDL	Strategize regarding pre-confirmation discovery.	0.20	\$175.00
02/28/25	JCH	Prepare file of cover emails with RCBO's response to Westport's request for information for its individual plaintiffs (.3) and update tracking spreadsheet regarding same (.2).	0.50	\$165.00
02/28/25	JMT	Revise discovery requests to Committee on multiple issues.	1.40	\$1,225.00
02/28/25	KAFA	Prepare JCCP 5108 deposition notices for bankruptcy team review.	0.20	\$90.00
02/28/25	MCM	Revise discovery requests to Committee regarding various issues (.5); confer with M. Thomas regarding same (.4).	0.90	\$832.50

Task Total: 11.00 \$8,571.50

**034 Other Motion Practice**

02/23/25	MDL	Revise motion for settlement with R. Galindo and supporting documents.	0.60	\$525.00
02/24/25	EPK	Review update from S. Moses regarding the Committee's reservation of rights relating to pending motion to extend removal deadline (.1); email correspondence with S. Moses regarding same (.1).	0.20	\$175.00
02/24/25	SJM	Analyze Committee response to motion to extend removal deadline (.4); email to Foley team regarding approach in light of same (.3).	0.70	\$612.50

Task Total: 1.50 \$1,312.50

**038 Mediation**

02/03/25	MDL	Telephone conference with S. Warren (O'Melveny) regarding potential compromises on plan and disclosure statement language.	0.40	\$350.00
02/04/25	AMUE	Email communication to three mediators regarding mediation (.3) and follow-up communication with Judge Sontchi (.2) and Judge Newsome (.4).	0.90	\$945.00
02/04/25	EPM	Draft summary of outreach from insurers regarding claims analysis.	0.90	\$756.00
02/04/25	MCM	Email correspondence regarding mediation issues for mediation scheduled on 2/24-25.	0.40	\$370.00
02/04/25	MDL	Evaluate information to be shared with insurers in advance of mediation.	0.20	\$175.00
02/06/25	EPM	Internal email discussions regarding insurer requests for claims analysis.	0.50	\$420.00
02/07/25	EPM	Call with CNA counsel regarding claims analysis.	0.50	\$420.00
02/10/25	AMUE	Email communication with mediators regarding mediation with insurers (.3); review response received from Judge Newsome (.2); telephone call with T. Gallagher (.3); meeting with Judge Sontchi, M. Moore and M. Lee (.7); develop strategy notes for mediation (1.1).	2.60	\$2,730.00
02/10/25	MCM	Conference call with Judge Sontchi regarding resumption of mediation, discussion with the Committee, and other mediation issues.	0.60	\$555.00
02/10/25	MDL	Strategize for February mediation with A. Uetz.	0.20	\$175.00
02/10/25	MDL	Evaluate confidential mediation issue to be discussed with insurers.	0.30	\$262.50
02/10/25	MDL	Telephone conference with C. Sontchi regarding preparation for mediation.	0.70	\$612.50
02/10/25	MDL	Strategize regarding approach to mediation and confidential mediation issues.	1.90	\$1,662.50
02/12/25	EPM	Attend confidential mediation session.	1.50	\$1,260.00
02/12/25	ERR	Analyze mediation strategy.	0.50	\$550.00

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02/12/25	ERR	Attend pre-mediation meeting with T. Gallagher and Judge Newsome.	0.80	\$880.00
02/12/25	MDL	Participate in mediation session with insurers, Judge Newsome, and T. Gallagher.	1.50	\$1,312.50
02/12/25	MDL	Draft summary of confidential mediation issue.	0.10	\$87.50
02/13/25	EPM	Review notes regarding February 12, 2025 mediation session (.5); draft summary of same for case team review (.6).	1.10	\$924.00
02/14/25	EPM	Review confidential mediation materials.	1.50	\$1,260.00
02/17/25	EPM	Draft summary of confidential mediation session.	0.30	\$252.00
02/19/25	MDL	Strategize for joint mediation session.	0.70	\$612.50
02/20/25	AMUE	Meeting with M. Lee regarding mediation matter (.7); prepare for mediation (1.0).	1.70	\$1,785.00
02/20/25	MDL	Strategize with A. Uetz regarding mediation strategy.	0.70	\$612.50
02/21/25	AMUE	Prepare for mediation by review of information concerning privileged issue related to real estate (1.1); communication with mediators regarding mediation (.2).	1.30	\$1,365.00
02/23/25	AMUE	Prepare for global mediation.	1.80	\$1,890.00
02/24/25	AMUE	Prepare for mediation (1.9); appearance at global mediation (8.4); debrief meeting with M. Lee and R. Manns (1.0).	11.30	\$11,865.00
02/24/25	ERR	Attend Day #1 mediation with Committee, insurers and Debtor (partial).	5.00	\$5,500.00
02/24/25	MCM	Email correspondence regarding mediation issues with Foley team.	0.50	\$462.50
02/24/25	MDL	Participate in mediation session with Committee and insurers.	8.40	\$7,350.00
02/24/25	SJM	Attend (for part) mediation with Committee and insurers.	5.60	\$4,900.00
02/25/25	AMUE	Appearance at mediation (8.0); draft proposed stipulation adjourning dates for 30 days in light of mediation (1.0).	9.00	\$9,450.00

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02/25/25	EPM	Review coverage parameters for certain insurance policies for use in confidential mediation discussions.	0.80	\$672.00
02/25/25	ERR	Attend Day #2 of global mediation.	8.00	\$8,800.00
02/25/25	MCM	Email correspondence with Foley team regarding mediation and related issues (.4); debrief with M. Lee regarding same and status of discussions (.5); respond to requests for information from mediation parties (.5).	1.40	\$1,295.00
02/25/25	MDL	Participate in mediation session on behalf of Debtor (partial).	7.30	\$6,387.50
02/25/25	SJM	Participate in mediation with Committee and insurers (partial).	1.20	\$1,050.00
02/26/25	AMUE	Meeting with mediators to debrief following mediation (.8); email communication with client leadership regarding mediation (.5).	1.30	\$1,365.00
02/26/25	EPM	Draft letter to insurer regarding confidential mediation subjects.	1.90	\$1,596.00
02/26/25	ERR	Telephone call with mediators regarding status of settlement discussions (partial).	0.50	\$550.00
02/26/25	SJM	Respond to A. Uetz regarding privileged mediation matter.	0.30	\$262.50
02/27/25	EPM	Continue drafting letter to insurer regarding confidential mediation matters.	1.50	\$1,260.00
02/28/25	AMUE	Meeting with mediators regarding status of mediation proposal.	0.80	\$840.00
02/28/25	ERR	Attend virtual meeting with mediators regarding status of settlements (partial).	0.60	\$660.00
		Task Total:	89.00	\$86,490.00
		Services Total:	754.30	\$637,824.00

**Professional Services Summary**

Service Provider	Initials	Title	Hours	Rate	Amount
Joseph S. Harper	JSH	Associate	6.20	\$800.00	\$4,960.00
Mason Roberts	MR	Associate	30.80	\$795.00	\$24,486.00
Mary Rofaeil	MRL	Associate	12.10	\$675.00	\$8,167.50
Mikaela R. Mitcham	MRM	Associate	33.50	\$675.00	\$22,612.50
Nora McGuffey	NMCG	Associate	14.80	\$700.00	\$10,360.00
Shane J. Moses	SJM	Of Counsel	108.30	\$875.00	\$94,762.50
Janelle C. Harrison	JCH	Paralegal	30.80	\$330.00	\$10,164.00
Kerry A. Farrar	KAFA	Paralegal	48.50	\$450.00	\$21,825.00
Ann Marie Uetz	AMUE	Partner	121.20	\$1,050.00	\$127,260.00
Emil P. Khatchaturian	EPK	Partner	36.70	\$875.00	\$32,112.50
Eileen R. Ridley	ERR	Partner	30.40	\$1,100.00	\$33,440.00
Geoffrey S. Goodman	GSG	Partner	21.20	\$1,050.00	\$22,260.00
Jonathan Michael Thomas	JMT	Partner	5.70	\$875.00	\$4,987.50
Jeff R. Blease	JRBL	Partner	0.50	\$1,375.00	\$687.50
Mark C. Moore	MCM	Partner	51.20	\$925.00	\$47,360.00
Matthew D. Lee	MDL	Partner	63.40	\$875.00	\$55,475.00
Thomas F. Carlucci	TFCA	Partner	2.00	\$1,375.00	\$2,750.00
Alan R. Ouellette	AROU	Senior Counsel	16.80	\$875.00	\$14,700.00
Elizabeth P. Mazzocco	EPM	Senior Counsel	80.10	\$840.00	\$67,284.00
Matthew S. Kiel	MSK	Senior Counsel	1.20	\$875.00	\$1,050.00
Tamar N. Dolcourt	TND	Special Counsel	38.90	\$800.00	\$31,120.00
<b>Totals</b>			<b>754.30</b>		<b>\$637,824.00</b>

**Expenses Incurred**

Description	Amount
Electronic Legal Research Services	\$439.36
LSS - eDiscovery Services	\$3,800.00
Meals	\$3,045.73
<b>Expenses Incurred Total</b>	<b>\$7,285.09</b>

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.

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**Expense Detail**

**Electronic Legal Research Services**

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Amount</b>
02/28/25	SJM	Docket Report. Image1771-0. Westlaw.	\$439.36

**LSS - eDiscovery Services**

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Amount</b>
02/28/25	JRBL	LSS - eDiscovery Services.	\$3,800.00

**Meals**

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Amount</b>
02/20/25	ASD	VENDOR: U.S. BANK - 02/24/25 Lunch for RCBO mediation for parties and mediators (38 attendees).	\$673.76
02/21/25	ASD	VENDOR: U.S. BANK - 02/25/25 Lunch for RCBO mediation for parties and mediators (38 attendees).	\$673.76
02/24/25	ASD	VENDOR: U.S. BANK - 02/24/25 Breakfast for RCBO mediation for parties and mediators (38 attendees).	\$762.75
02/24/25	ASD	VENDOR: U.S. BANK - 02/24/25 Additional lunch for RCBO mediation for parties and mediators (38 attendees).	\$77.94
02/24/25	ASD	VENDOR: U.S. BANK - 02/25/25 Additional lunch for RCBO mediation for parties and mediators (38 attendees).	\$82.83
02/25/25	ASD	VENDOR: U.S. BANK - 02/25/25 Additional breakfast order for RCBO mediation for parties and mediators (38 attendees).	\$11.94
02/25/25	ASD	VENDOR: U.S. BANK - 02/25/25 Breakfast for RCBO mediation for parties and mediators (38 attendees).	\$762.75
			<hr/> \$3,045.73

Expense Total: 

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\$7,285.09