

LOWENSTEIN SANDLER LLP

JEFFREY D. PROL (admitted pro hac vice)

jprol@lowenstein.com

BRENT WEISENBERG (admitted pro hac vice)

bweisenberg@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar No. 151445)

tkeller@kbbkllp.com

GABRIELLE L. ALBERT (Cal. Bar No. 190895)

galbert@kbbkllp.com

101 Montgomery Street, Suite 1950

San Francisco, California 94104

Telephone: (415) 496-6723

BURNS BAIR LLP

TIMOTHY W. BURNS (admitted pro hac vice)

tburns@burnsbair.com

JESSE J. BAIR (admitted pro hac vice)

jbair@burnsbair.com

10 E. Doty Street, Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2302

Counsel for the Official Committee of Unsecured Creditors

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

Case No. 23-40523 WJL

Chapter 11

In re:

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

Debtor.

**COVER SHEET TO FIFTH INTERIM FEE
APPLICATION OF BURNS BAIR LLP AS
SPECIAL INSURANCE COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF JANUARY 1, 2025
THROUGH APRIL 30, 2025**

Judge: Hon. William J. Lafferty

Date: August 13, 2025

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

Objection Deadline: July 7, 2025

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

Name of Applicant:	Burns Bair LLP
Name of Client:	The Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland
Time period covered by this application:	January 1, 2025 through April 30, 2025
Total compensation sought this period:	\$338,125.00
Total expenses sought this period:	\$14,701.12
Petition date:	May 8, 2023
Retention date:	July 14, 2023
Date of Order approving employment:	August 16, 2023
Total compensation approved by interim order to date:	\$1,575,686.20
Total expenses approved by interim order to date:	\$53,971.56
Total compensation paid by interim order to date:	\$1,575,686.20
Total expenses paid by interim order to date:	\$53,971.56
Blended rate in the Interim Application for all attorneys:	\$849.34
Blended rate in the Interim Application for all timekeepers:	\$841.74
Fees sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$236,719.20
Expenses sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$14,196.42
If applicable, number of professionals in this application not included in staffing plan approved by client	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals included in this application:	7
Number of professionals billing fewer than 15 hours to the case during this period:	3
Are any rates higher than those approved or disclosed at retention?	No
Interim or Final:	Interim

SUMMARY OF MONTHLY FEE STATEMENTS

Date Filed & Docket	Period Covered	Total Compensation and Expenses Incurred		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date	
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees (80%)	Expenses (100%)
2/28/2025 [Dkt. 1791]	1/1/2025 – 1/31/2025	\$175,402.00	\$7,644.33	\$140,321.60	\$7,644.33	\$140,321.60	\$7,644.33
3/31/25 [Dkt. 1859]	2/1/2025- 2/28/2025	\$77,743.00	\$3,749.80	\$62,194.40	\$3,749.80	\$62,194.40	\$3,749.80
4/30/25 [Dkt. 1938]	3/1/2025 - 3/31/2025	\$42,754.00	\$2,802.29	\$34,203.20	\$2,802.29	\$34,203.20	\$2,802.29
5/30/25 [Dkt. 2018]	4/1/2025 - 4/30/2025	\$42,226.00	\$504.70	\$33,780.80	\$504.70	\$0	\$0

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Fee Application Not Yet Paid: \$101,910.50

LOWENSTEIN SANDLER LLP

JEFFREY D. PROL (admitted pro hac vice)

jprol@lowenstein.com

BRENT WEISENBERG (admitted pro hac vice)

bweisenberg@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar No. 151445)

tkeller@kbbkllp.com

GABRIELLE L. ALBERT (Cal. Bar No. 190895)

galbert@kbbkllp.com

101 Montgomery Street, Suite 1950

San Francisco, California 94104

Telephone: (415) 496-6723

BURNS BAIR LLP

TIMOTHY W. BURNS (admitted pro hac vice)

tburns@burnsbair.com

JESSE J. BAIR (admitted pro hac vice)

jbair@burnsbair.com

10 E. Doty Street, Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2302

Counsel for the Official Committee of Unsecured Creditors

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

Case No. 23-40523 WJL

In re:

Chapter 11

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

Debtor.

**FIFTH INTERIM FEE APPLICATION OF
BURNS BAIR LLP AS SPECIAL INSURANCE
COUNSEL TO THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR
ALLOWANCE AND PAYMENT OF FEES
AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM JANUARY 1, 2025
THROUGH APRIL 30, 2025**

Judge: Hon. William J. Lafferty

Date: August 13, 2025

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

Objection Deadline: July 7, 2025

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

1 Burns Bair LLP (the “**Applicant**” or “**Burns Bair**”), special insurance counsel to the
2 Official Committee of Unsecured Creditors (the “**Committee**”) of the Roman Catholic Bishop
3 of Oakland (the “**Debtor**”) in the above captioned chapter 11 case (the “**Chapter 11 Case**”)
4 hereby submits its Fifth Interim Fee Application (the “**Interim Application**”), for an order, in
5 substantially the form attached hereto as **Exhibit A**, pursuant to sections 330 and 331 of title 11
6 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of
7 Bankruptcy Procedure (the “**Bankruptcy Rules**”), the United States Trustee Appendix B
8 Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed
9 Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013
10 (the “**U.S. Trustee Guidelines**”), the *Guidelines for Compensation and Expense Reimbursement*
11 *of Professionals and Trustees* (the “**Northern District Guidelines**”), and the Local Bankruptcy
12 Rules for the Northern District of California (the “**Local Rules**”), and the *Order Authorizing*
13 *Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the
14 “**Interim Compensation Order**”) [Dkt. No. 170] entered by the Court on June 23, 2023, for
15 interim approval and allowance of (i) compensation for professional services rendered to the
16 Committee from January 1, 2025 through and including April 30, 2025 (the “**Interim Fee**
17 **Period**”) and (ii) reimbursement of expenses incurred in connection with such services; and, in
18 support thereof, respectfully represents as follows:

19 **PRELIMINARY STATEMENT**

20 1. Since Burns Bair’s retention by the Committee on July 14, 2023, Burns Bair has
21 been actively engaged in all aspects of the case with the goal of maximizing insurance recoveries
22 to unsecured creditors of the Debtor. Upon its retention, Burns Bair reviewed and analyzed
23 thousands of pages of the Debtor’s historical insurance policy materials, developed insurance
24 exposure assessments for each of the Debtor’s insurance carriers, researched and briefed various
25 insurance motions in both the main Case and the insurance adversary proceeding, presented to
26 the Committee on case insurance issues, and began to develop the Committee’s overall insurance
27 strategy, among other time-sensitive tasks.
28

2. These efforts have required Burns Bair to work closely with the Committee and its lead counsel to keep the Committee informed throughout this Chapter 11 Case. Burns Bair has also worked with the Debtor and its professional advisors, always with the goal of maximizing insurance returns for the unsecured creditors.

3. The Interim Application is based upon the points and authorities cited herein, the Declarations of Jesse J. Bair and Steve Woodall, filed concurrently herewith, the exhibits attached thereto, the pleadings, papers, and records on file in this case, and any evidence or argument that the Court may entertain at the time of the hearing on the Interim Application.

JURISDICTION

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. sections 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the Local Rules. This is a core proceeding pursuant to 28 U.S.C. section 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. sections 1408 and 1409.

CASE BACKGROUND AND STATUS

A. Debtor's Bankruptcy Proceedings

5. The Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on May 8, 2023 (the “**Petition Date**”). The Debtor continues to operate its business and manages its properties as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. By Order dated May 10, 2024, the Court appointed David M. Klauder as fee examiner in this Chapter 11 Case [Dkt. 1122]. On November 8, 2014, the Debtor filed a proposed Plan of Reorganization [Dkt. 1444], which the Committee is opposing.

B. Selection of the Committee

6. On May 23, 2023, pursuant to Section 1102 of the Bankruptcy Code, the Office of the United States Trustee (the “**U.S. Trustee**”) selected interested creditors to serve on the Committee. Pursuant to section 1102(a)(1) of the Bankruptcy Code, the U.S. Trustee appointed nine members to serve on the Committee. Upon formation, the Committee selected Mr. Steve Woodall as its chair. On May 30, 2023, the Committee selected Lowenstein Sandler LLP as its

1 lead counsel. On June 1, 2023, the Committee selected Keller Benvenuti Kim LLP as local
2 bankruptcy counsel. On July 14, 2023, the Committee selected Burns Bair LLP as special
3 insurance counsel.

4 **C. The Committee's Retention of Burns Bair**

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

23 **D. Summary of Professional Compensation and Reimbursement of Expenses**
24 **Requested**

25 8. By this Interim Application, the Applicant seeks interim allowance of
26 compensation in the amount of **\$338,125.00** and actual and necessary expenses in the amount of
27 **\$14,701.12** for a total allowance of **\$352,826.12** for the Interim Fee Period.

28 9. All services for which Burns Bair requests compensation were performed for or
on behalf of the Committee. Burns Bair has received no promises of payment from any source

1 other than the Debtor for services rendered or to be rendered in any capacity whatsoever in
2 connection with the matters covered by this Interim Application.

3 10. There is no agreement or understanding between Burns Bair and any other person
4 other than the partners of Burns Bair for the sharing of compensation to be received for services
5 rendered in this Chapter 11 Case. In connection with the Chapter 11 Case, as of this date Burns
6 Bair has been paid **\$1,812,405.40** in fees and **\$68,167.98** in expenses.

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

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

26
27
28

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

13. During the Interim Fee Period, Burns Bair professionals expended 401.70 hours on behalf of the Committee. Of this, 247.20 hours were expended by Burns Bair partners, 148.50 hours by Burns Bair associates, and 6.0 hours by paraprofessionals. In accordance with the Interim Compensation Order, the Northern District Guidelines, the U.S. Trustee Guidelines, and the Local Rules, Burns Bair has classified services performed into four specific categories set forth below. Burns Bair has attempted to place the services provided in the category that best relates to such services; because certain services may relate to one or more categories, however, services pertaining to one category may in fact be included in another category. The following summary of services rendered during the Interim Fee Period is not intended to be a detailed description of the work performed. Rather, it merely highlights certain project billing categories in which significant services were rendered by Burns Bair, as well as identifies some of the issues Burns Bair was required to address.

A. Committee Meetings
Fees: \$13,512.00; Total Hours: 13.40

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

B. Fee Applications
Fees: \$6,088.00; Total Hours: 10.0

15. During the Interim Fee Period, Burns Bair prepared four monthly fee statements for the periods December 1, 2024 through December 31, 2024 [Dkt No. 1682], January 1, 2025 through January 31, 2025 [Dkt. No. 1791], February 1, 2025 through February 28, 2025 [Dkt. No. 1859], and March 1, 2025 through March 31, 2025 [Dkt. No. 1938]. Burns Bair also prepared its Fourth Interim Fee Application [Dkt. 1739].

1 **C. Hearings**

2 **Fees: \$33,893.00; Total Hours: 35.20**

3 16. During the Interim Fee Period, Burns Bair attorneys appeared before the Court as
4 special insurance counsel to the Committee at various hearings in both the Insurance Adversary
5 Proceedings and the main Chapter 11 Case concerning case insurance issues, including, without
6 limitation, the Committee's motion to lift stay and insurance derivative standing motions, various
7 iterations of the Debtor's Amended Disclosure Statement, the Debtor's Motion to Abate the
8 District Court insurance action, the Debtor's Mediation Motion, and case status conferences.

9 **D. Insurance Recovery Activities**

10 **Fees: \$284,632.00; Total Hours: 343.10**

11 17. In addition to the above described tasks, during the Interim Fee Period, Burns
12 Bair expended a considerable number of hours on behalf of the Committee performing additional
13 insurance recovery activities including, but not limited to, preparing for and participating in full-
14 day mediation sessions; preparing detailed insurance strategy presentations for presentment to
15 the Committee and State Court Counsel; analysis of insurance issues in connection with amended
16 versions of the Debtor's proposed Plan of Reorganization and Disclosure Statement, including
17 associated legal research; drafting insurance portions of the Committee's lift stay reply briefing,
18 including associated legal research and factual analysis; comprehensive analysis of insurance
19 issues in connection with amended versions of the Debtor's proposed Plan of Reorganization
20 and Disclosure Statement, including associated legal research; drafting insurance portions of the
21 Committee's amended disclosure statement objections; drafting the Committee's insurance
22 derivative standing reply briefing, including associated legal research and factual analysis;
23 participating in meet and confer with the Debtor regarding case mediation issues; analysis
24 regarding insurance-related Confirmation discovery and expert issues; continued detailed
25 research of California law and analysis of Debtor historical policy materials in connection with
26 potential Plan structure and settlement issues; and continuing to develop overall insurance
27 strategy for the Committee.
28

1 **ACTUAL AND NECESSARY DISBURSEMENTS**

2 18. During the Interim Fee Period, Burns Bair incurred a total of **\$14,701.12** in
3 expenses. These expenses relate primarily to travel in connection with court hearings and in-
4 person mediations. These expenses are reasonable and necessary for the administration of the
5 Chapter 11 Case.

6 **LEGAL BASIS FOR INTERIM COMPENSATION**

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

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

19 **COMPLIANCE WITH LARGE CASE REQUIREMENTS**

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

22 **Exhibit B:** Customary and Comparable Compensation Disclosures with Fee Applications

23 **Exhibit C:** Budget and Staffing Plan

24 **Exhibit D:** Summary of Timekeepers in this Application

25 **Exhibit E:** Summary of Compensation by Project Category

26 **Exhibit F:** Summary of Expense Reimbursement

27 **Exhibit G:** Detailed records for the Compensation Period

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

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

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28
- 29
- 30
- 31
- 32
- 33
- 34
- 35
- 36
- 37
- 38
- 39
- 40
- 41
- 42
- 43
- 44
- 45
- 46
- 47
- 48
- 49
- 50
- 51
- 52
- 53
- 54
- 55
- 56
- 57
- 58
- 59
- 60
- 61
- 62
- 63
- 64
- 65
- 66
- 67
- 68
- 69
- 70
- 71
- 72
- 73
- 74
- 75
- 76
- 77
- 78
- 79
- 80
- 81
- 82
- 83
- 84
- 85
- 86
- 87
- 88
- 89
- 90
- 91
- 92
- 93
- 94
- 95
- 96
- 97
- 98
- 99
- 100

NOTICE

CONCLUSION

Date: June 13, 2025

Respectfully submitted,

BURNS BAIR LLP

By: /s/ Jesse J. Bair
Jesse J. Bair

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

LOWENSTEIN SANDLER LLP

JEFFREY D. PROL (admitted pro hac vice)

jprol@lowenstein.com

BRENT WEISENBERG (admitted pro hac vice)

bweisenberg@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar No. 151445)

tkeller@kbbkllp.com

GABRIELLE L. ALBERT (Cal. Bar No. 190895)

galbert@kbbkllp.com

101 Montgomery Street, Suite 1950

San Francisco, California 94104

Telephone: (415) 496-6723

BURNS BAIR LLP

TIMOTHY W. BURNS (admitted pro hac vice)

tburns@burnsbair.com

JESSE J. BAIR (admitted pro hac vice)

jbair@burnsbair.com

10 E. Doty Street, Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2302

Counsel for the Official Committee of Unsecured Creditors

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

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

**[PROPOSED] ORDER GRANTING FIFTH
INTERIM FEE APPLICATION OF BURNS
BAIR LLP AS SPECIAL INSURANCE
COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF JANUARY 1, 2025
THROUGH APRIL 30, 2025**

Judge: Hon. William J. Lafferty

Date: August 13, 2025

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

Objection Deadline: July 7, 2025

Place: United States Bankruptcy Court

1300 Clay Street, Courtroom 220

Oakland, CA 94612

Upon consideration of the *Fifth Interim Fee Application of Burns Bair LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period of January 1, 2025 through April 30, 2025* (the “**Interim Application**”);¹ and this Court having jurisdiction to consider the Interim Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal) and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California; and consideration of the Interim Application and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Interim Application having been provided to the parties listed therein, and it appearing that no other or further notice need be provided; and this Court having reviewed the Interim Application of Burns Bair; and, upon the record and all of the proceedings had before the Court; and this Court having found and determined that the relief sought in the Interim Application is in the best interests of the Debtor, its estate, creditors, and all parties in interest; and that the legal and factual bases set forth in the Interim Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Interim Application is granted as provided herein.
2. Burns Bair is awarded an interim allowance of its compensation for professional services rendered in the amount of \$352,826.12 consisting of \$338,125.00 of fees and reimbursement of \$14,701.12 of actual and necessary expenses incurred during the Interim Fee Period.
3. The Debtor is directed to pay Burns Bair the amount allowed in paragraph 2 above.
4. The Court shall retain jurisdiction to determine any controversy arising in connection with this Order.

**** END OF ORDER ****

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Court Service List

All registered ECF participants.

EXHIBIT B
CUSTOMARY AND COMPARABLE DISCLOSURES WITH FEE APPLICATIONS

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

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

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

Category of Timekeeper	Blended Hourly Rate	
	BILLED ¹ Firm for proceeding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner	\$977.79	\$1,039.10
Associate	\$513.45	\$533.46
Paralegal	\$374.81	\$340.00
All Timekeepers Aggregated	\$622.67	\$841.74

Case Name: Roman Catholic Bishop of Oakland
Case Number: 23-BK-40523
Applicant's Name: Burns Bair LLP
Date of Application: June 13, 2025
Interim or Final: Interim

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

EXHIBIT C

PROPOSED FIFTH INTERIM BUDGET FOR SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE ROMAN CATHOLIC BISHOP OF OAKLAND FOR THE PERIOD JANUARY 1, 2025 THROUGH APRIL 30, 2025

Project Category	Estimated Hours		Estimated Fees ¹	
	Low	High	Low	High
Meetings of and Communication with Creditors	100	120	\$66,800.00	\$80,160.00
Fee Applications	15	20	\$10,020.00	\$13,360.00
Hearings	40	60	\$26,720.00	\$40,080.00
Mediation	125	150	\$83,500.00	\$100,200.00
Plan and Disclosure Statement	150	200	\$100,200.00	\$133,600.00
Other Insurance Recovery Activities, including Adversary Proceedings and Bankruptcy Litigation	375	425	\$250,500.00	\$283,900.00
TOTAL	805	975	\$537,740.00	\$651,300.00

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

STAFFING PLAN FOR SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE ROMAN CATHOLIC BISHOP OF OAKLAND FOR THE PERIOD JANUARY 1, 2025 THROUGH APRIL 30, 2025

Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter During the Budget Period	Average Hourly Rate
Partner	2	\$900 - \$1120
Associate	4-6	\$470 - \$550
Paralegal	2	\$340

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

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

EXHIBIT D

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

NAME OF PROFESSIONAL:	POSITION	YEAR ADMITTED	HOURLY RATE	TOTAL HOURS	TOAL FEES
Timothy W. Burns	Partner	1991	\$1,120.00	156.30	\$175,056.00
Jesse J. Bair	Partner	2013	\$900.00	90.90	\$81,810.00
Nathan M. Kuenzi	Associate	2020	\$550.00	106.80	\$58,740.00
Brian P. Cawley	Associate	2020	\$550.00	11.00	\$6,050.00
Alexander R. Castro	Associate	2024	\$470.00	30.70	\$14,429.00
Brenda Horn-Edwards	Paralegal	N/A	\$340.00	4.00	\$1,360.00
Karen Dempksi	Paralegal	N/A	\$340.00	2.00	\$680.00
Total:				401.70	\$338,125.00

EXHIBIT E

SUMMARY OF COMPENSATION REQUESTED BY CATEGORY

Category	Hours Billed this Fee Period	Total for Fee Statement
Committee Meetings	13.40	\$13,512.00
Fee Applications	10.00	\$6,088.00
Hearings	35.20	\$33,893.00
Insurance Recovery Activities	343.10	\$284,632.00
Total:	401.70	\$338,125.00

EXHIBIT F

SUMMARY OF EXPENSE REIMBURSEMENT

Expense Category	Total Expenses
Copying Service	\$21.10
Travel – Flights	\$6,152.99
Travel – Hotels	\$6,086.07
Travel – Meals	\$387.66
Travel – Mileage, Tolls, Parking, Taxi/Uber	\$2,053.30
TOTAL:	\$14,701.12

Exhibit G

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 2/28/2025

Bill # : 01851

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

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

Fee Applications

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

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
-------------	-------------------	------------------	--------------	---------------

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

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

Insurance Recovery Activities

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Total Hours and Fees	205.50	\$175,402.00
-----------------------------	---------------	---------------------

EXPENSES

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

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

Timekeeper Summary

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

Total Due This Invoice: \$183,046.33

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 3/27/2025

Bill # : 01872

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/18/2025	Timothy Burns	Participate in state court counsel meeting for insurance purposes re Plan and mediation issues (.8);	0.80	\$896.00
2/18/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re Plan issues, insurance strategy, and ongoing negotiations (.8);	0.80	\$720.00
2/19/2025	Timothy Burns	Participate in Committee meeting re mediation preparations and strategy (1.7);	1.70	\$1,904.00
Totals for Committee Meetings			3.30	\$3,520.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/13/2025	Brenda Horn-Edwards	Draft exhibits to Burns Bair fourth interim fee application (1.0);	1.00	\$340.00
2/13/2025	Brenda Horn-Edwards	Draft declaration of S. Woodall in support of Burns Bair fourth interim fee application (.1);	0.10	\$34.00
2/13/2025	Brenda Horn-Edwards	Draft declaration of J. Bair in support of Burns Bair fourth interim fee application (.2); draft Exhibit A to same (.1);	0.30	\$102.00
2/13/2025	Brenda Horn-Edwards	Review and revise Burns Bair fourth interim fee application (.5); correspond with J. Bair re same (.1);	0.60	\$204.00
2/13/2025	Karen Dempski	Begin drafting BB interim fee application (1.0); correspond with J. Bair and B. Horn-Edwards re same (.1);	1.10	\$374.00
2/13/2025	Jesse Bair	Review and respond to correspondence with KBK and BB teams re next round of interim fee applications (.1);	0.10	\$90.00

2/14/2025	Jesse Bair	Review and edit Burns Bair's fourth interim fee application and accompanying exhibits (1.1); correspond with G. Albert re same (.1);	1.20	\$1,080.00
2/15/2025	Karen Dempski	Docket/calendar fee applications hearing (.1);	0.10	\$34.00
2/17/2025	Jesse Bair	Review notice of hearing re interim professional fee applications and correspondence with Committee professionals re same (.1);	0.10	\$90.00
2/17/2025	Jesse Bair	Draft Burns Bair interim budget (.4); correspondence with Committee and state court counsel re same (.1);	0.50	\$450.00
2/27/2025	Jesse Bair	Correspond with B. Horn re Burns Bair monthly fee statement (.1);	0.10	\$90.00
2/28/2025	Jesse Bair	Review and edit Burns Bair monthly fee statement (.1); correspond with KBK and B. Horn-Edwards re same (.1);	0.20	\$180.00
2/28/2025	Brenda Horn-Edwards	Draft monthly professional fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
Totals for Fee Applications			5.70	\$3,170.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/1/2025	Timothy Burns	Review and analysis of potential mediation /Plan structure options (.9); draft memo to file re particular Plan structure option (.5);	1.40	\$1,568.00
2/1/2025	Timothy Burns	Participate in call with J. Bair re potential Plan structure option (.2);	0.20	\$224.00
2/1/2025	Timothy Burns	Participate in call with B. Wiesenbergs re potential Plan structure option (.1);	0.10	\$112.00
2/1/2025	Jesse Bair	Analyze T. Burns email memo re potential Committee Plan structure (.2); participate in call with T. Burns re same (.2); correspond with N. Kuenzi re insurance research in connection with same (.1);	0.50	\$450.00
2/1/2025	Jesse Bair	Review B. Wiesenbergs draft insurance disclosure statement argument (.2); review relevant Plan language in connection with same (.1);	0.30	\$270.00
2/1/2025	Nathan Kuenzi	Research caselaw issue on payments by debtor as part of assignment of insurance rights (.9);	0.90	\$495.00

2/2/2025	Nathan Kuenzi	Analyze issues relating to brief in response to Court's memorandum re insurance disclosure statement issues (.8);	0.80	\$440.00
2/2/2025	Nathan Kuenzi	Review B. Weisenberg draft insert for disclosure statement brief (.4);	0.40	\$220.00
2/3/2025	Jesse Bair	Participate in conference with T. Burns re supplemental insurance disclosure statement briefing (.2); provide instructions to N. Kuenzi re same (.1);	0.30	\$270.00
2/3/2025	Nathan Kuenzi	Draft additional sections of the Committee's response to the Court's memorandum re disclosure statement insurance issues (2.9); review relevant case law and insurer positions takes in other bankruptcy cases in connection with same (1.4);	4.30	\$2,365.00
2/3/2025	Timothy Burns	Participate in conference with J. Bair re disclosure statement insurance briefing (.2); review correspondence with BB team and Lowenstein re same (.1);	0.30	\$336.00
2/3/2025	Timothy Burns	Review and respond to correspondence with B. Weisenberg re mediation strategy (.1);	0.10	\$112.00
2/4/2025	Timothy Burns	Review and revise the Committee's supplemental insurance disclosure statement brief (.9);	0.90	\$1,008.00
2/4/2025	Jesse Bair	Review and edit revised version of the Committee's supplemental brief re disclosure statement insurance issues (.9); review and respond to correspondence with Lowenstein re same (.2);	1.10	\$990.00
2/4/2025	Nathan Kuenzi	Draft revised disclosure statement opposition brief incorporating T. Burns and B. Wiesenberg edits (1.9);	1.90	\$1,045.00
2/5/2025	Jesse Bair	Participate in conference with Committee professionals re the Committee's supplemental disclosure statement insurance brief, upcoming mediation session, and Plan structure issues (1.0);	1.00	\$900.00
2/5/2025	Jesse Bair	Review and respond to correspondence with the debtor re outstanding insurance discovery requests (.2);	0.20	\$180.00
2/5/2025	Timothy Burns	Review Debtor correspondence to the insurers re document production issues (.1); review correspondence with BB Team and the debtor re additional discovery production issues (.1);	0.20	\$224.00
2/5/2025	Timothy Burns	Review correspondence with Lowenstein and the Committee re mediation issues (.2);	0.20	\$224.00

2/5/2025	Timothy Burns	Participate in conference with Committee professionals re the Committee's supplemental disclosure statement insurance brief and other case issues (1.0);	1.00	\$1,120.00
2/5/2025	Timothy Burns	Review and revise latest draft of disclosure statement insurance brief (.2);	0.20	\$224.00
2/5/2025	Nathan Kuenzi	Participate in conference with Committee professionals re the Committee's supplemental disclosure statement insurance brief and additional case issues (1.0);	1.00	\$550.00
2/5/2025	Nathan Kuenzi	Draft further revised version of the Committee's supplemental insurance-related disclosure statement brief, incorporating comments from Committee professionals' meet and confer (2.4);	2.40	\$1,320.00
2/6/2025	Timothy Burns	Review insurer-diocese meet and confer correspondence (.2); correspond with N. Kuenzi re same (.1);	0.30	\$336.00
2/6/2025	Timothy Burns	Review and revise near-final version of supplemental insurance-related disclosure statement brief (.3); correspond with team re questions re same (.1);	0.40	\$448.00
2/6/2025	Timothy Burns	Review additional correspondence and analysis from internal team and Lowenstein re disclosure statement insurance brief issues (.2);	0.20	\$224.00
2/6/2025	Nathan Kuenzi	Review and analyze questions relating to effect of discharge in proposed Plan (.8);	0.80	\$440.00
2/6/2025	Nathan Kuenzi	Review T. Burns correspondence re discovery issues in the insurance district court action (.1); review court order re same (.1);	0.20	\$110.00
2/6/2025	Jesse Bair	Review and edit further revised version of the Committee's supplemental disclosure statement insurance brief (.6); correspond with Lowenstein re same (.1);	0.70	\$630.00
2/6/2025	Jesse Bair	Review and edit most recent iteration of the Committee's supplemental insurance brief re disclosure statement issues, including additional revisions from Lowenstein (.3); review and respond to correspondence with Committee professionals re same and additional revisions (.3);	0.60	\$540.00
2/6/2025	Jesse Bair	Analyze potential discharge-related edits to the Plan (.2); review and respond to correspondence with B. Wiesenbergr re same (.1);	0.30	\$270.00
2/6/2025	Jesse Bair	Review additional correspondence from the debtor re outstanding adversary proceeding insurance discovery and meet and confer with the carriers re same (.1);	0.10	\$90.00

2/7/2025	Timothy Burns	Review final changes to disclosure statement insurance brief (.2);	0.20	\$224.00
2/7/2025	Timothy Burns	Review correspondence with BB and Lowenstein re mediation issues (.1);	0.10	\$112.00
2/7/2025	Jesse Bair	Review and edit near-final version of the Committee's supplemental disclosure statement insurance brief (.2);	0.20	\$180.00
2/7/2025	Jesse Bair	Correspond with B. Wiesenbergs re upcoming state court counsel meeting re insurance Plan issues (.1);	0.10	\$90.00
2/8/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation strategy (.4);	0.40	\$448.00
2/8/2025	Timothy Burns	Review correspondence with Lowenstein and state court counsel re disclosure statement briefing (.1);	0.10	\$112.00
2/10/2025	Timothy Burns	Begin preparing for February 24-25 mediation (1.1);	1.10	\$1,232.00
2/11/2025	Nathan Kuenzi	Analyze claim analysis spreadsheet sent by B. Weisenberg in advance of discussions on the same (.8);	0.80	\$440.00
2/11/2025	Jesse Bair	Review revised insurer exposure and claim assessment spreadsheet in connection with insurance Plan issues (.2);	0.20	\$180.00
2/12/2025	Timothy Burns	Review correspondence with the Committee and state court counsel re mediation issues (.1);	0.10	\$112.00
2/12/2025	Jesse Bair	Participate in conference with T. Burns re insurance mediation and litigation strategy (.5); review of claim chart in preparation for Committee professionals' call (.1)	0.60	\$540.00
2/12/2025	Timothy Burns	Participate in call with Committee professionals re insurance and mediation strategy (1.1);	1.10	\$1,232.00
2/12/2025	Timothy Burns	Participate in conference with J. Bair re insurance mediation and litigation strategy (.5);	0.50	\$560.00
2/12/2025	Timothy Burns	Review of claim chart in preparation for UCC professionals' call (.1);	0.10	\$112.00
2/12/2025	Timothy Burns	Participate in call with opposing counsel re mediation and insurance issues (.6);	0.60	\$672.00
2/12/2025	Nathan Kuenzi	Participate in conference with Committee professionals re revised claim analysis, ongoing mediation negotiations, and Plan strategy (1.1);	1.10	\$605.00
2/12/2025	Timothy Burns	Review correspondence with Committee professionals re plan issues and upcoming mediation (.2); review correspondence with BB and the Debtor re insurance document production issues (.1); participate in conference with J. Bair re mediation strategy and ongoing negotiations (.1);	0.40	\$448.00

2/12/2025	Jesse Bair	Review transcript of district court status conference in connection with insurance discovery obligations to the Committee (.1); correspond with the Debtor re same and outstanding insurance discovery (.1);	0.20	\$180.00
2/12/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re revised claim analysis and meeting re ongoing mediation negotiations (.1);	0.10	\$90.00
2/12/2025	Jesse Bair	Participate in conference with T. Burns re mediation strategy and ongoing negotiations (.1);	0.10	\$90.00
2/12/2025	Jesse Bair	Review Order clarifying that automatic stay does not apply to non-debtors and related correspondence with Committee professionals and state court counsel re same (.1);	0.10	\$90.00
2/12/2025	Jesse Bair	Prepare for Committee professionals' meeting (.1); participate in conference with Committee professionals re revised claim analysis, ongoing mediation negotiations, and Plan strategy (1.1);	1.20	\$1,080.00
2/13/2025	Jesse Bair	Participate in conference with T. Burns re outcome of meeting with debtor re Plan issues and mediation negotiations (.2);	0.20	\$180.00
2/13/2025	Timothy Burns	Review lift stay order (.1);	0.10	\$112.00
2/13/2025	Timothy Burns	Participate in conference with J. Bair re outcome of meeting with debtor re Plan issues and mediation negotiations (.2);	0.20	\$224.00
2/14/2025	Nathan Kuenzi	Review and analyze RCBO proposed amendments to Plan/DS (1.8);	1.80	\$990.00
2/14/2025	Nathan Kuenzi	Participate in conference with Lowenstein and BRG re preparations for mediation session (.9);	0.90	\$495.00
2/14/2025	Jesse Bair	Participate in conference with Lowenstein and Stout re claim assessment issues, ongoing mediation negotiations, and Plan issues (.5);	0.50	\$450.00
2/15/2025	Jesse Bair	Review and respond to correspondence with B. Wiesenbergs re Committee insurance revisions to the Debtor's second amended disclosure statement (.1);	0.10	\$90.00
2/17/2025	Nathan Kuenzi	Analyze redlines of Second Amended DS and Plan filed by RCBO (.8);	0.80	\$440.00
2/17/2025	Timothy Burns	Review the debtor's revised disclosure statement and proposed responses by the Committee (1.1);	1.10	\$1,232.00

2/17/2025	Timothy Burns	Review insurers' reply re January 24 Court insurance memorandum (.2); review debtor's reply re January 24 court insurance memorandum (.2); review correspondence with Lowenstein and the debtor re disclosure statement issues (.1);	0.50	\$560.00
2/17/2025	Jesse Bair	Review and edit draft version of the debtor's second amended disclosure statement for insurance purposes (.9); correspond with Lowenstein re same (.1); review draft correspondence to the debtor re same (.1);	1.10	\$990.00
2/17/2025	Jesse Bair	Review the debtor's response to the Committee's supplemental disclosure statement insurance brief (.2); review the insurers' response to same (.2);	0.40	\$360.00
2/17/2025	Jesse Bair	Review Committee insurance overview presentation (.1); correspond with B. Wiesenbergs re same and preparations for upcoming mediation (.1);	0.20	\$180.00
2/18/2025	Timothy Burns	Review correspondence with B. Weisenbergs and the debtor re disclosure statement issues (.1);	0.10	\$112.00
2/18/2025	Jesse Bair	Review further revised version of the disclosure statement and related correspondence from the Debtor (.1);	0.10	\$90.00
2/19/2025	Nathan Kuenzi	Analyze coverage issues regarding Pacific Employers and claims falling within the relevant policy period (.9);	0.90	\$495.00
2/19/2025	Nathan Kuenzi	Draft response to Pacific Employers letter requesting particular information (.3);	0.30	\$165.00
2/19/2025	Jesse Bair	Brief review re most recent iteration of the Plan and Disclosure Statement (.2); correspond with T. Burns re insurance issues re same (.1);	0.30	\$270.00
2/19/2025	Jesse Bair	Review exposure assessment re Pacific Employers and correspond with N. Kuenzi re same (.1);	0.10	\$90.00
2/20/2025	Jesse Bair	Additional analysis re insurance-related disclosure statement issues (.1);	0.10	\$90.00
2/21/2025	Timothy Burns	Review Second OPF Objection (.2); review correspondence with Lowenstein, the Committee, and state court counsel re same (.1);	0.30	\$336.00
2/21/2025	Timothy Burns	Prepare for February mediation session (.8);	0.80	\$896.00
2/21/2025	Timothy Burns	Review correspondence with Lowenstein and state court counsel re upcoming mediation (.2);	0.20	\$224.00
2/21/2025	Timothy Burns	Review correspondence with B. Weisenbergs re confirmation issues and associated research (.2);	0.20	\$224.00

2/21/2025	Nathan Kuenzi	Analyze and identify key insurance and claims materials for preparation and use at upcoming mediation session (1.2);	1.20	\$660.00
2/21/2025	Jesse Bair	Review draft response to Pacific Employers letter (.1); correspond with BB team re same (.1); correspond with Debtor re outstanding insurance discovery (.1);	0.30	\$270.00
2/22/2025	Timothy Burns	Review additional correspondence with Lowenstein and state court counsel re mediation issues (.2);	0.20	\$224.00
2/22/2025	Timothy Burns	Review and respond to N. Kuenzi correspondence re insurer's request for information (.2); review J. Bair correspondence re same (.1);	0.30	\$336.00
2/22/2025	Jesse Bair	Review and edit the Committee's objection to the second amended disclosure statement (.3); review and edit the Committee's solicitation letter (.2); review the Committee's proposed disclosure statement redline (.1); review and respond to correspondence with Committee professionals re same (.2);	0.80	\$720.00
2/22/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re outstanding insurance discovery items and next-steps (.3);	0.30	\$270.00
2/23/2025	Jesse Bair	Review correspondence with Committee professionals re finalization of the Committee disclosure statement objection (.1);	0.10	\$90.00
2/23/2025	Nathan Kuenzi	Analyze Clergy III settlement documents (1.3);	1.30	\$715.00
2/23/2025	Nathan Kuenzi	Review most recent proposed versions of the debtor's Plan and disclosure statement (.8); review the Committee's draft objection same (.6);	1.40	\$770.00
2/24/2025	Nathan Kuenzi	Participate in full-day mediation session for insurance purposes (6.1);	6.10	\$3,355.00
2/24/2025	Nathan Kuenzi	Review debtor's revised liquidation analysis in connection with ongoing mediation negotiations (1.3);	1.30	\$715.00
2/24/2025	Timothy Burns	Finish preparations for day 1 of mediation session (1.7);	1.70	\$1,904.00
2/24/2025	Timothy Burns	Participate in full-day mediation session for insurance purposes (6.1);	6.10	\$6,832.00
2/24/2025	Timothy Burns	Participate in post-session conference with state court counsel re outcome of day 1 of mediation session and next-steps (.7); participate in call with J. Bair re same (.1);	0.80	\$896.00
2/24/2025	Jesse Bair	Participate in call with T. Burns re outcome of day 1 of mediation session (.1);	0.10	\$90.00

2/24/2025	Jesse Bair	Review further revised version of the Committee's disclosure statement objection and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
2/25/2025	Jesse Bair	Attend portion of mediation via Zoom re mediators' proposal (.2);	0.20	\$180.00
2/25/2025	Jesse Bair	Participate in call with T. Burns re outcome of day 2 of mediation session and next-steps (.2);	0.20	\$180.00
2/25/2025	Timothy Burns	Prepare for day 2 of mediation session (.8);	0.80	\$896.00
2/25/2025	Timothy Burns	Participate in full-day mediation session for insurance purposes (6.2);	6.20	\$6,944.00
2/25/2025	Timothy Burns	Participate in call with J. Bair re outcome of day 2 of mediation session and next-steps (.2);	0.20	\$224.00
2/25/2025	Timothy Burns	Review correspondence with Committee professionals re Clergy III materials (.2);	0.20	\$224.00
2/25/2025	Nathan Kuenzi	Participate in full-day mediation session for insurance purposes (6.2);	6.20	\$3,410.00
2/26/2025	Nathan Kuenzi	Draft summary of action items stemming from mediation (.5);	0.50	\$275.00
2/26/2025	Timothy Burns	Conference with J. Bair re mediation (.2); conference with B. Weisenberg re mediation (.2);	0.40	\$448.00
2/26/2025	Jesse Bair	Participate in additional call with T. Burns re next-steps in light of mediation outcome (.2);	0.20	\$180.00
2/27/2025	Jesse Bair	Review correspondence from the mediators' re potential offer (.1); review correspondence with Committee professionals re same and potential response (.1);	0.20	\$180.00
2/28/2025	Jesse Bair	Review notice of status conference and adjournment of continued disclosure statement hearing (.1);	0.10	\$90.00
2/28/2025	Jesse Bair	Participate in call with Committee professionals re mediation status, potential next-steps, and overall case strategy (.9);	0.90	\$810.00
2/28/2025	Jesse Bair	Participate in conference with T. Burns re mediator inquiry and potential response to same (.2);	0.20	\$180.00
2/28/2025	Timothy Burns	Participate in conference with Committee professionals re mediation strategy, status, and next-steps (.9);	0.90	\$1,008.00
2/28/2025	Timothy Burns	Participate in conference with J. Bair re response to mediators' inquiries (.2);	0.20	\$224.00
2/28/2025	Timothy Burns	Correspondence with Committee professionals and mediators re mediation meeting (.2);	0.20	\$224.00
2/28/2025	Timothy Burns	Review notice of status conference and continued disclosure statement hearing (.1);	0.10	\$112.00

2/28/2025	Timothy Burns	Review correspondence and attachments from state court counsel re coordinated proceeding order (.2);	0.20	\$224.00
2/28/2025	Timothy Burns	Participate in conference with mediators and Lowenstein re mediation issues (1.0);	1.00	\$1,120.00
2/28/2025	Karen Dempksi	Docket/calendar status conference and disclosure statement hearings (.1);	0.10	\$34.00
Totals for Insurance Recovery Activities			85.40	\$71,053.00

Total Hours and Fees			94.40	\$77,743.00
-----------------------------	--	--	--------------	--------------------

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
02/23/2025	Uber, T. Burns (airport to hotel)	\$128.61
02/23/2025	Travel meal, T. Burns	\$5.06
02/23/2025	Hotel, N. Kuenzi (2 nights)	\$553.86
02/23/2025	Travel meal, N. Kuenzi	\$14.39
02/23/2025	Travel meal, N. Kuenzi	\$26.71
02/23/2025	Hotel, T. Burns (2 nights)	\$700.07
02/23/2025	Uber, N. Kuenzi (airport to hotel)	\$53.95
02/23/2025	United Airlines, N. Kuenzi (MSN-SFO, Feb. 23-25)	\$921.81
02/23/2025	United Airlines, T. Burns (MSN-SFO-ORD, Feb. 23-25)	\$1,115.35
02/24/2025	Travel meal, T. Burns	\$19.55
02/25/2025	Travel meal, N. Kuenzi	\$6.99
02/25/2025	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
02/25/2025	Travel meal, T. Burns	\$32.59
02/25/2025	Uber, N. Kuenzi (hotel to airport)	\$119.79
02/26/2025	Airport parking, N. Kuenzi	\$37.00
02/26/2025	Travel meal, N. Kuenzi	\$6.07
Total Expenses		\$3,749.80

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	2.30	\$340.00	\$782.00
Jesse Bair	Partner	17.80	\$900.00	\$16,020.00
Karen Dempksi	Paralegal	1.30	\$340.00	\$442.00
Nathan Kuenzi	Associate	37.30	\$550.00	\$20,515.00
Timothy Burns	Partner	35.70	\$1,120.00	\$39,984.00

Total Due This Invoice: \$81,492.80

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 4/28/2025

Bill # : 01925

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/20/2025	Timothy Burns	Participate in state court counsel meeting re insurance strategy (1.6);	1.60	\$1,792.00
3/20/2025	Jesse Bair	Prepare for state court counsel meeting (.1); participate in portion of state court counsel meeting for insurance purposes re insurance strategy and Plan issues (1.5);	1.60	\$1,440.00
3/21/2025	Jesse Bair	Prepare for Committee meeting (.1); participate in Committee meeting for insurance purposes re litigation, Plan, and mediation issues (1.0);	1.10	\$990.00
3/28/2025	Timothy Burns	Participate in state court counsel meeting re insurance Plan structure (1.3);	1.30	\$1,456.00
Totals for Committee Meetings			5.60	\$5,678.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/27/2025	Brenda Horn-Edwards	Draft monthly professional fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
3/27/2025	Jesse Bair	Correspond with B. Horn-Edwards re preparing monthly fee statement (.1);	0.10	\$90.00
3/28/2025	Jesse Bair	Edit and finalize monthly fee statement and correspond with KBK re same (.1);	0.10	\$90.00
Totals for Fee Applications			0.50	\$282.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/3/2025	Timothy Burns	Participate in status hearing for insurance purposes (.5);	0.50	\$560.00
3/3/2025	Nathan Kuenzi	Participate in status conference for insurance purposes (.5);	0.50	\$275.00
Totals for Hearings			1.00	\$835.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/1/2025	Jesse Bair	Review Travelers' response to Boicourt letters (.1);	0.10	\$90.00
3/3/2025	Timothy Burns	Conference with J. Bair re outcome of status hearing (.1);	0.10	\$112.00
3/3/2025	Nathan Kuenzi	Prepare for zoom hearing / status conference (.8);	0.80	\$440.00
3/3/2025	Nathan Kuenzi	Review and respond to correspondence with state court counsel re reinsurance questions (.3);	0.30	\$165.00
3/3/2025	Nathan Kuenzi	Review Rule 2004 briefing and materials produced by the insurers re reinsurance (.4);	0.40	\$220.00
3/3/2025	Jesse Bair	Review and respond to correspondence with state court counsel re reinsurance issue (.1);	0.10	\$90.00
3/3/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re disclosure statement issues (.2);	0.20	\$224.00
3/3/2025	Timothy Burns	Participate in call with J. Bair re ongoing mediation negotiations (.2);	0.20	\$224.00
3/3/2025	Jesse Bair	Participate in call with T. Burns re ongoing mediation negotiations (.2);	0.20	\$180.00
3/3/2025	Jesse Bair	Participate in conference with T. Burns re outcome of status conference (.1);	0.10	\$90.00
3/4/2025	Nathan Kuenzi	Supplemental analysis re CIGA issues and exposure in connection with RCBO claims (.4);	0.40	\$220.00
3/4/2025	Nathan Kuenzi	Review and respond to correspondence with Travelers re Boicourt letter issues (.2);	0.20	\$110.00
3/4/2025	Nathan Kuenzi	Review insurance Plan terms in connection with ongoing discussions re potential modifications to same (1.5);	1.50	\$825.00
3/4/2025	Karen Dempksi	Docket/calendar new dates for disclosure statement (1);	0.10	\$34.00
3/5/2025	Jesse Bair	Review joint status reports in district court insurance action (.2);	0.20	\$180.00
3/5/2025	Jesse Bair	Review and respond to correspondence with state court counsel and BB team re CIGA issues (.1);	0.10	\$90.00

3/5/2025	Nathan Kuenzi	Review and respond to correspondence with state court counsel re CIGA obligations (.3);	0.30	\$165.00
3/6/2025	Nathan Kuenzi	Review CNA's response to Boicourt letters (.2);	0.20	\$110.00
3/6/2025	Jesse Bair	Review agenda for upcoming Committee meeting and related correspondence with state court counsel re meeting with BRG (.1);	0.10	\$90.00
3/7/2025	Jesse Bair	Review Westport's responses to Boicourt letters (.1); review correspondence with T. Burns re same (.1);	0.20	\$180.00
3/8/2025	Jesse Bair	Review state court counsels' reply to Westport's Boicourt letter response (.1);	0.10	\$90.00
3/9/2025	Jesse Bair	Review B. Wiesenbergs correspondence re case developments and insurance issues (.1);	0.10	\$90.00
3/10/2025	Nathan Kuenzi	Review Boicourt letters sent on behalf of claimants to Westport and Westport's responses to same (.3);	0.30	\$165.00
3/10/2025	Timothy Burns	Participate in call with state court counsel re insurance strategy (.2); participate in conference with Lowenstein re same (.1); participate in conference with J. Bair re same (.2);	0.50	\$560.00
3/10/2025	Jesse Bair	Participate in conference with T. Burns re case insurance strategy and next-steps (.2);	0.20	\$180.00
3/10/2025	Jesse Bair	Review correspondence with certain insurers re Boicourt letters (.1); review and respond to questions re additional insured coverage (.2);	0.30	\$270.00
3/11/2025	Jesse Bair	Analysis re potential revisions to Plan insurance assignment (.1);	0.10	\$90.00
3/13/2025	Jesse Bair	Review correspondence with Committee professionals and state court counsel re Committee insurance strategy and related meeting re same (.2);	0.20	\$180.00
3/14/2025	Timothy Burns	Review insurers' responses to Boicourt letters (.2); review and respond to correspondence with state court counsel re same (.2);	0.40	\$448.00
3/14/2025	Jesse Bair	Review Westport's supplemental response re Boicourt letters (.1);	0.10	\$90.00
3/14/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation issues (.2);	0.20	\$224.00
3/17/2025	Jesse Bair	Brief review of third amended Plan (.1); participate in call with state court counsel re ongoing mediation negotiations (.2);	0.30	\$270.00
3/17/2025	Timothy Burns	Begin preparing for upcoming disclosure statement hearing (.1);	0.10	\$112.00

3/17/2025	Timothy Burns	Prepare for insurance strategy meeting with state court counsel (.4); participate in call with state court counsel re same (.2);	0.60	\$672.00
3/17/2025	Timothy Burns	Correspond with N. Kuenzi re the debtor's third amended plan (.1);	0.10	\$112.00
3/17/2025	Timothy Burns	Review and respond to correspondence with state court counsel re insurance strategy and mediation (.1);	0.10	\$112.00
3/18/2025	Timothy Burns	Review correspondence with Lowenstein re the debtor's third amended plan and disclosure statement (.1);	0.10	\$112.00
3/18/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation issues (.2);	0.20	\$224.00
3/18/2025	Timothy Burns	Participate in call with B. Weisenberg re agenda re upcoming insurance strategy meeting (.2);	0.20	\$224.00
3/18/2025	Nathan Kuenzi	Analyze the debtor's third amended Plan for insurance purposes (2.2); draft correspondence to T. Burns summarizing changes from second amended plan (.3);	2.50	\$1,375.00
3/18/2025	Timothy Burns	Review N. Kuenzi correspondence re third amended Plan (.2); brief review of particular portions of Plan (.3);	0.50	\$560.00
3/18/2025	Nathan Kuenzi	Analyze particular Plan insurance issues in preparation for upcoming insurance strategy meeting (.4);	0.40	\$220.00
3/18/2025	Timothy Burns	Participate in call with state court counsel re mediation issues (.2);	0.20	\$224.00
3/18/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re mediation-related meetings (.3);	0.30	\$336.00
3/19/2025	Timothy Burns	Prepare for insurance strategy presentation (1.7);	1.70	\$1,904.00
3/19/2025	Timothy Burns	Review and respond to correspondence with state court counsel re mediation issues (.2); participate in call with B. Weisenberg re same (.2);	0.40	\$448.00
3/19/2025	Timothy Burns	Participate in conference with J. Bair re insurance mediation and litigation strategy (.2);	0.20	\$224.00
3/19/2025	Jesse Bair	Review correspondence with state court counsel and Committee professionals re case insurance strategy and related meeting re same (.1); review carrier exposure assessments in connection with same (.2);	0.30	\$270.00
3/19/2025	Jesse Bair	Participate in conference with T. Burns re insurance mediation and litigation strategy (.2);	0.20	\$180.00

3/19/2025	Timothy Burns	Review and respond to correspondence with state court counsel re insurance strategy (.3);	0.30	\$336.00
3/20/2025	Timothy Burns	Participate in call with state court counsel re Diocesan settlement issues (.2);	0.20	\$224.00
3/20/2025	Timothy Burns	Correspondence regarding mediation-related meeting with debtor (.2);	0.20	\$224.00
3/20/2025	Timothy Burns	Review and edit slide deck for use during state court counsel insurance strategy meeting (1.2);	1.20	\$1,344.00
3/20/2025	Timothy Burns	Review and respond to correspondence with state court counsel re Plan structure issues (.2);	0.20	\$224.00
3/20/2025	Timothy Burns	Conference with mediator re mediation status (.1);	0.10	\$112.00
3/20/2025	Timothy Burns	Analysis re next-steps in light of outcome of state court counsel insurance strategy meeting (.4);	0.40	\$448.00
3/20/2025	Timothy Burns	Participate in call with BRG and Lowenstein re Diocesan settlement issues (.8);	0.80	\$896.00
3/20/2025	Timothy Burns	Review and respond to multiple correspondence with state court counsel re insurance strategy presentation (.4);	0.40	\$448.00
3/22/2025	Timothy Burns	Review correspondence from Travelers re Boicourt letters (.2);	0.20	\$224.00
3/24/2025	Timothy Burns	Review US Fire's response to Boicourt letter with attached letter from Diocese and response from US Fire (.2);	0.20	\$224.00
3/24/2025	Timothy Burns	Review and respond to correspondence with state court counsel re insurance strategy (.3); participate in call with B. Weisenberg and J. Prol re same (.2);	0.50	\$560.00
3/24/2025	Nathan Kuenzi	Begin preparing for upcoming disclosure statement hearing (.2);	0.20	\$110.00
3/24/2025	Jesse Bair	Review correspondence with state court counsel re insurance strategy and Plan meeting (.1);	0.10	\$90.00
3/24/2025	Jesse Bair	Provide instructions to N. Kuenzi re preparations and insurance strategy for upcoming disclosure statement hearing (.2);	0.20	\$180.00
3/25/2025	Timothy Burns	Review and respond to correspondence with state court counsel re insurance plan structure (.2);	0.20	\$224.00
3/25/2025	Nathan Kuenzi	Continue preparing for upcoming disclosure statement hearing (.1);	0.10	\$55.00
3/25/2025	Jesse Bair	Participate in conference with the mediator re ongoing mediation negotiations (.2);	0.20	\$180.00
3/25/2025	Timothy Burns	Attend mediation related conference with debtor counsel (.7);	0.70	\$784.00

3/25/2025	Jesse Bair	Further analysis re insurance issues in connection with upcoming disclosure statement hearing (.1);	0.10	\$90.00
3/25/2025	Timothy Burns	Review LMI's response re Boicourt letters (.1);	0.10	\$112.00
3/25/2025	Timothy Burns	Conference with state court counsel re mediation developments (.1);	0.10	\$112.00
3/25/2025	Timothy Burns	Prepare for mediation related conference with the debtor (.8);	0.80	\$896.00
3/26/2025	Timothy Burns	Review the debtor's third amended disclosure statement (.4) review and respond to J. Bair correspondence re same (.1);	0.50	\$560.00
3/26/2025	Timothy Burns	Review the Committee's objection to Third Amended Disclosure Statement (.3);	0.30	\$336.00
3/26/2025	Jesse Bair	Review the Committee's objection to the debtor's third amended disclosure statement (.3); correspond with BB team re same and insurance strategy for upcoming hearing (.2);	0.50	\$450.00
3/26/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation developments (.2); participate in call with state court counsel re same (.2);	0.40	\$448.00
3/26/2025	Timothy Burns	Review amendments to ballot (.1);	0.10	\$112.00
3/27/2025	Nathan Kuenzi	Outline argument for upcoming disclosure statement hearing (.9);	0.90	\$495.00
3/27/2025	Timothy Burns	Participate in conference with J. Bair re disclosure statement hearing strategy and case mediation developments (.2); participate in call with state court counsel re same (.1);	0.30	\$336.00
3/27/2025	Jesse Bair	Participate in conference with T. Burns re disclosure statement hearing strategy and case mediation developments (.2);	0.20	\$180.00
3/28/2025	Timothy Burns	Prepare for state court counsel meeting re Plan structure (.6);	0.60	\$672.00
3/28/2025	Nathan Kuenzi	Analyze case law, insurance Plan provisions, and disclosure statement revisions in connection with upcoming disclosure statement hearing (1.6);	1.60	\$880.00
3/28/2025	Jesse Bair	Provide instructions to N. Kuenzi re insurance strategy for upcoming disclosure statement hearing (.1);	0.10	\$90.00
3/29/2025	Nathan Kuenzi	Continue drafting oral argument outline for upcoming disclosure statement hearing (1.3);	1.30	\$715.00
3/30/2025	Alexander Castro	Review and analyze email re: bad faith claim splitting research project (.1);	0.10	\$47.00
3/30/2025	Nathan Kuenzi	Continue preparing for upcoming disclosure statement hearing (.8);	0.80	\$440.00

3/31/2025	Timothy Burns	Review Boicourt letter response from Continental (.2);	0.20	\$224.00
3/31/2025	Timothy Burns	Review and revise N. Kuenzi's oral argument outline (.2);	0.20	\$224.00
3/31/2025	Alexander Castro	Research California insurance law re bad faith claims splitting (2.6);	2.60	\$1,222.00
3/31/2025	Nathan Kuenzi	Finish preparing for disclosure statement oral argument, including drafting revised oral argument outline (1.9);	1.90	\$1,045.00
3/31/2025	Timothy Burns	Prepare for disclosure statement hearing (1.6);	1.60	\$1,792.00
3/31/2025	Jesse Bair	Review and edit draft PowerPoint for state court counsel re insurance-related Plan issues (.4);	0.40	\$360.00
3/31/2025	Timothy Burns	Review and analysis of insurance-related plan structure options (1.1); draft memo to file re same (.7);	1.80	\$2,016.00
3/31/2025	Alexander Castro	Draft memo summarizing research re California bad faith claims splitting issues (2.1);	2.10	\$987.00
3/31/2025	Jesse Bair	Review N. Kuenzi insurance oral argument outline for disclosure statement hearing (.1);	0.10	\$90.00
3/31/2025	Timothy Burns	Participate in call with state court counsel re insurance plan structure issues (.3);	0.30	\$336.00
Totals for Insurance Recovery Activities			43.10	\$35,959.00

Total Hours and Fees	50.20	\$42,754.00
-----------------------------	--------------	--------------------

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/26/2025	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
03/26/2025	Travel meal, T. Burns	\$32.78
03/31/2025	Travel meal, N. Kuenzi	\$5.75
03/31/2025	Hotel, N. Kuenzi (2 nights)	\$933.24
03/31/2025	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
03/31/2025	United Airlines, N. Kuenzi	\$846.37
03/31/2025	United Airlines, T. Burns	\$368.52
03/31/2025	Hotel, T. Burns (1 nights)	\$466.62
03/31/2025	Travel meal, N. Kuenzi	\$22.77
03/31/2025	Uber, N. Kuenzi	\$71.23
03/31/2025	Travel meal, T. Burns	\$32.78
03/31/2025	Travel meal, N. Kuenzi	\$6.23
Total Expenses		\$2,802.29

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	4.80	\$470.00	\$2,256.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Jesse Bair	Partner	7.80	\$900.00	\$7,020.00
Karen Dempski	Paralegal	0.10	\$340.00	\$34.00
Nathan Kuenzi	Associate	14.60	\$550.00	\$8,030.00
Timothy Burns	Partner	22.60	\$1,120.00	\$25,312.00

Total Due This Invoice: \$45,556.29

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 5/29/2025

Bill # : 01932

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/7/2025	Brenda Horn-Edwards	Analyze fee examiner letter, obtain requested information, and draft summary responding to same (.7); correspond with J. Bair re same (.1);	0.80	\$272.00
4/7/2025	Jesse Bair	Brief review re fee examiner's preliminary report and correspond with B. Horn-Edwards re information needed to respond to same (.2);	0.20	\$180.00
4/8/2025	Jesse Bair	Review and analyze information in response to fee examiner's preliminary report (.3); draft response to fee examiner re requested information and other issues (.3);	0.60	\$540.00
4/28/2025	Brenda Horn-Edwards	Draft monthly professional fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
4/28/2025	Jesse Bair	Correspond with B. Horn-Edward re preparing monthly fee statement (.1);	0.10	\$90.00
4/29/2025	Jesse Bair	Review and edit monthly fee statement (.1); participate in call with fee examiner re consolidated final report and upcoming hearing (.1);	0.20	\$180.00
4/30/2025	Jesse Bair	Review debtor's motion to amend compensation order (.2); draft portion of Committee response to same (.5);	0.70	\$630.00
4/30/2025	Jesse Bair	Prepare for fee application hearing (.4);	0.40	\$360.00
Totals for Fee Applications			3.30	\$2,354.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/1/2025	Timothy Burns	Participate in disclosure statement hearing, including related negotiations with the debtor to resolve outstanding issues (3.4);	3.40	\$3,808.00

4/1/2025	Nathan Kuenzi	Participate in disclosure statement hearing, including related negotiations with the debtor (3.4);	3.40	\$1,870.00
4/3/2025	Nathan Kuenzi	Participate in continued disclosure statement hearing via Zoom for insurance purposes (.4);	0.40	\$220.00
4/30/2025	Jesse Bair	Participate in fee application hearing (.7);	0.70	\$630.00
Totals for Hearings			7.90	\$6,528.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/1/2025	Timothy Burns	Prepare for disclosure statement hearing (.7);	0.70	\$784.00
4/1/2025	Nathan Kuenzi	Analyze pending insurance issues following outcome of disclosure statement hearing and draft memo re proposed next steps (1.0);	1.00	\$550.00
4/1/2025	Nathan Kuenzi	Finish preparing for hearing on Third Amended Disclosure statement, including finalization of oral argument outline (1.9);	1.90	\$1,045.00
4/2/2025	Nathan Kuenzi	Analyze issues pertaining to potential insurance discovery and outline same (.4);	0.40	\$220.00
4/2/2025	Jesse Bair	Review and respond to email memo re confirmation insurance discovery, experts, and related litigation issues (.3); follow-up correspondence with T. Burns re same (.1);	0.30	\$270.00
4/4/2025	Nathan Kuenzi	Analyze order approving third amended disclosure statement and assess discovery requirements in connection with same (.4);	0.40	\$220.00
4/5/2025	Timothy Burns	Review B. Weisenberg correspondence re disclosure statement approval and confirmation vote (.1);	0.10	\$112.00
4/6/2025	Jesse Bair	Review correspondence with B. Wiesenberg and the Committee re disclosure statement approval, voting process, and brief review re final version of Committee solicitation letter (.1);	0.10	\$90.00
4/6/2025	Jesse Bair	Brief review re motion to dismiss order re the Committee's OPF complaint and related correspondence with B. Wiesenberg (.1);	0.10	\$90.00
4/7/2025	Timothy Burns	Review, analyze, and respond to correspondence with state court counsel re insurance plan structure issues (.8);	0.80	\$896.00
4/7/2025	Karen Dempski	Docket/calendar confirmation hearing dates (.1);	0.10	\$34.00

4/8/2025	Jesse Bair	Review and respond to correspondence with Lowenstein re insurance-related Plan discovery (.2);	0.20	\$180.00
4/8/2025	Timothy Burns	Review Court's docket entries re confirmation deadlines (.1);	0.10	\$112.00
4/9/2025	Timothy Burns	Review correspondence with state court counsel and Committee professionals re insurance strategy meeting (.2); begin preparing for same (.2);	0.40	\$448.00
4/9/2025	Timothy Burns	Review correspondence with Committee professionals re Plan discovery (.2);	0.20	\$224.00
4/9/2025	Timothy Burns	Review Continental's Boicourt letter response (.1);	0.10	\$112.00
4/9/2025	Timothy Burns	Review and respond to state court counsel questions re bad-faith assignments in connection with Plan issues (.5);	0.50	\$560.00
4/9/2025	Jesse Bair	Review memo re potential Plan structure re post-confirmation insurance litigation (.2); review related correspondence with state court counsel re same (.1); review B. Wiesenbergs correspondence re potential insurance-related Plan discovery (.1);	0.40	\$360.00
4/9/2025	Nathan Kuenzi	Review and analyze correspondence with B. Weisenberg re plan confirmation expert issues (.3);	0.30	\$165.00
4/9/2025	Nathan Kuenzi	Brief review re additional insurer Boicourt letter responses (.2);	0.20	\$110.00
4/10/2025	Nathan Kuenzi	Correspond with Committee professionals re proposed Plan structure issues needed to address (.2);	0.20	\$110.00
4/10/2025	Jesse Bair	Additional analysis re potential insurance-related Plan discovery requests (.1);	0.10	\$90.00
4/10/2025	Jesse Bair	Participate in BB team conference re potential insurance Plan structures (.8);	0.80	\$720.00
4/10/2025	Nathan Kuenzi	Participate in BB team conference re potential insurance Plan structures (.8);	0.80	\$440.00
4/10/2025	Nathan Kuenzi	Analyze discovery issues regarding Plan confirmation and draft written RFPs and ROGs to insurers, Diocese, and Diocesan entities (2.5);	2.50	\$1,375.00
4/10/2025	Nathan Kuenzi	Participate in part of call with J. Prol and state court counsel re Plan issues (.5);	0.50	\$275.00
4/10/2025	Timothy Burns	Prepare memo to file re Plan insurance considerations (1.4);	1.40	\$1,568.00
4/10/2025	Timothy Burns	Participate in BB team conference re potential insurance Plan structures (.8);	0.80	\$896.00
4/10/2025	Timothy Burns	Participate in call with state court counsel re Plan insurance considerations (.7);	0.70	\$784.00

4/10/2025	Timothy Burns	Participate in call with B. Weisenberg re insurance confirmation discovery (.1); participate in brief call with state court counsel re same (.1); follow-up analysis in connection with same (.1);	0.30	\$336.00
4/11/2025	Timothy Burns	Participate in call with Committee professionals re confirmation discovery issues (.3); brief review re draft insurance-related discovery requests (.2);	0.50	\$560.00
4/11/2025	Nathan Kuenzi	Finish drafting written RFPs and ROGs to insurers, Diocese, and Diocesan entities (2.9);	2.90	\$1,595.00
4/11/2025	Jesse Bair	Draft revised set of potential insurance-related confirmation discovery requests (.5); review and respond to correspondence with Lowenstein re same and related call (.2);	0.70	\$630.00
4/11/2025	Jesse Bair	Participate in conference with Committee professionals re confirmation discovery strategy (.3);	0.30	\$270.00
4/12/2025	Nathan Kuenzi	Review first set of written discovery to Committee (.4);	0.40	\$220.00
4/12/2025	Timothy Burns	Correspond with Lowenstein re Plan discovery (.1);	0.10	\$112.00
4/14/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re confirmation experts (.2);	0.20	\$224.00
4/14/2025	Jesse Bair	Correspond with Lowenstein re expert issues (.1);	0.10	\$90.00
4/15/2025	Nathan Kuenzi	Analyze issues pertaining to upcoming discovery deadlines and expert witnesses (.2);	0.20	\$110.00
4/15/2025	Timothy Burns	Participate in call with Committee professionals re expert issues (.7);	0.70	\$784.00
4/15/2025	Timothy Burns	Follow up calls to potential experts re expert issues (.2);	0.20	\$224.00
4/15/2025	Timothy Burns	Participate in call with state court counsel and Committee professionals re Plan and insurance strategy (.8);	0.80	\$896.00
4/15/2025	Timothy Burns	Review confirmation scheduling order (.1);	0.10	\$112.00
4/15/2025	Timothy Burns	Review correspondence with Lowenstein and the Committee re confirmation discovery (.1);	0.10	\$112.00
4/15/2025	Timothy Burns	Review correspondence with state court counsel re stay relief (.1);	0.10	\$112.00
4/15/2025	Jesse Bair	Participate in call with Committee professionals re insurance expert issues and confirmation discovery (.7);	0.70	\$630.00
4/15/2025	Jesse Bair	Participate in call with state court counsel and Committee professionals re insurance Plan issues and related strategy (.8);	0.80	\$720.00

4/16/2025	Jesse Bair	Correspond with BB team re preparing response to the debtor's insurance-related discovery requests (.1);	0.10	\$90.00
4/16/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re interrogatory responses (.2);	0.20	\$224.00
4/16/2025	Nathan Kuenzi	Analyze discovery issued by Debtor on Committee and draft responses to insurance-related interrogatories (1.0);	1.00	\$550.00
4/18/2025	Nathan Kuenzi	Participate in call with T. Burns on expert witness issues (.2);	0.20	\$110.00
4/18/2025	Nathan Kuenzi	Draft memo addressing issues involving expert witness retention and potential topics of report (.3);	0.30	\$165.00
4/18/2025	Nathan Kuenzi	Review and respond to various correspondence with potential expert re case issues and potential report (.7);	0.70	\$385.00
4/18/2025	Timothy Burns	Participate in call with potential mediator re case issues and potential report (.3); formulate expert strategy and draft memo to file re same (.2); participate in call with N. Kuenzi re same (.2); follow-up correspondence re same (.1);	0.80	\$896.00
4/18/2025	Jesse Bair	Review and respond to correspondence with potential expert and BB team re case background and assignment (.2);	0.20	\$180.00
4/19/2025	Jesse Bair	Correspond with N. Kuenzi re insurance discovery issues (.1);	0.10	\$90.00
4/20/2025	Jesse Bair	Draft revised response to the debtor's insurance-related interrogatory (1.1); correspond with Lowenstein re same (.1);	1.20	\$1,080.00
4/20/2025	Timothy Burns	Review additional expert materials and correspond with Committee professionals re same (.2);	0.20	\$224.00
4/20/2025	Timothy Burns	Review BB correspondence re confirmation discovery (.1);	0.10	\$112.00
4/20/2025	Timothy Burns	Review correspondence with potential expert re potential assignment (.1);	0.10	\$112.00
4/20/2025	Nathan Kuenzi	Draft response to RCBO discovery request regarding basis for Plan's impairment of insurance recovery/extracontractual rights (1.2);	1.20	\$660.00
4/20/2025	Nathan Kuenzi	Review materials relating to potential expert witness (.5);	0.50	\$275.00
4/21/2025	Timothy Burns	Brief telephone conference with potential expert (.1);	0.10	\$112.00
4/21/2025	Timothy Burns	Review draft interrogatory response to debtor insurance request (.1);	0.10	\$112.00

4/21/2025	Timothy Burns	Review correspondence with B. Weisenberg, the Committee, and state court counsel re solicitation letter and plan voting (.1);	0.10	\$112.00
4/21/2025	Jesse Bair	Review Travelers' Boicourt letter responses (.1);	0.10	\$90.00
4/21/2025	Jesse Bair	Finalize insurance interrogatory response and correspond with Lowenstein re same (.1); review Lowenstein correspondence re Plan town hall (.1);	0.20	\$180.00
4/22/2025	Nathan Kuenzi	Review additional Boicourt letter responses from carriers (.3);	0.30	\$165.00
4/23/2025	Timothy Burns	Review settlement communication from Diocese (.2); correspond with Lowenstein re same (.1); outline response to same (.2);	0.50	\$560.00
4/23/2025	Timothy Burns	Communicate with potential expert re engagement (.1);	0.10	\$112.00
4/23/2025	Jesse Bair	Review correspondence from the debtor re mediation negotiations (.1);	0.10	\$90.00
4/23/2025	Nathan Kuenzi	Review materials referenced by potential expert in connection with potential report (.5);	0.50	\$275.00
4/24/2025	Jesse Bair	Participate in call with Committee professionals re strategy re confirmation litigation and ongoing negotiations (.6);	0.60	\$540.00
4/24/2025	Timothy Burns	Participate in call with Committee professionals re litigation issues and ongoing negotiations (.6);	0.60	\$672.00
4/25/2025	Timothy Burns	Correspondence with Lowenstein re potential insurance expert (.1); email to N. Kuenzi re potential insurance expert (.1); correspondence with potential expert re same and further correspondence with Lowenstein (.2);	0.40	\$448.00
4/25/2025	Timothy Burns	Review and respond to email from Lowenstein re confirmation discovery (.1);	0.10	\$112.00
4/25/2025	Jesse Bair	Review and respond to correspondence with Lowenstein re confirmation discovery issues (.1); review additional correspondence with Committee professionals re call with potential expert (.1);	0.20	\$180.00
4/25/2025	Nathan Kuenzi	Review and respond to correspondence with Lowenstein re retention of potential expert witness (.3);	0.30	\$165.00
4/26/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re call with potential expert (.1);	0.10	\$90.00
4/26/2025	Timothy Burns	Review and revise draft interrogatory response (.2);	0.20	\$224.00

4/27/2025	Karen DempSKI	Docket/calendar motions to quash and protective order hearings (.1);	0.10	\$34.00
4/28/2025	Timothy Burns	Review and respond to additional correspondence with Committee professionals re engagement of potential expert (.2);	0.20	\$224.00
4/28/2025	Timothy Burns	Review and analysis of Joint Motion to Quash Subpoena (.2);	0.20	\$224.00
4/28/2025	Timothy Burns	Review the Committee's motion for protective order (.2);	0.20	\$224.00
4/28/2025	Timothy Burns	Review Pacific's Opposition to Motion to Enlarge for Late File Claim (.2);	0.20	\$224.00
4/28/2025	Timothy Burns	Review court's order re substantive consolidation (.2); review correspondence with Lowenstein re same (.1);	0.30	\$336.00
4/28/2025	Timothy Burns	Review transcript of 4/24 hearing (.4);	0.40	\$448.00
4/28/2025	Jesse Bair	Review A. Castro research memo re bad faith claims splitting issues (.2);	0.20	\$180.00
4/28/2025	Nathan Kuenzi	Review and respond to B. Weisenberg insurance-related expert questions (.3);	0.30	\$165.00
4/29/2025	Nathan Kuenzi	Participate in call with potential expert witness and Committee professionals re potential report (.6);	0.60	\$330.00
4/29/2025	Timothy Burns	Conference with co-counsel and potential expert (.6);	0.60	\$672.00
4/30/2025	Timothy Burns	Additional review of expert materials in connection with potential report (.2);	0.20	\$224.00
4/30/2025	Jesse Bair	Review B. Wiesenberg correspondence re case developments and next-steps (.1);	0.10	\$90.00
Totals for Insurance Recovery Activities			40.40	\$33,344.00

Total Hours and Fees	51.60	\$42,226.00
-----------------------------	--------------	--------------------

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/01/2025	Travel meal, T. Burns	\$19.55
04/01/2025	Uber, N. Kuenzi (hotel to courthouse)	\$132.70
04/01/2025	Uber, N. Kuenzi (courthouse to hotel)	\$99.94
04/02/2025	Uber, N. Kuenzi (hotel to airport)	\$45.92
04/02/2025	Travel meal, T. Burns	\$19.55
04/02/2025	Taxi, T. Burns (hotel to airport)	\$155.26
04/02/2025	Airport parking, N. Kuenzi	\$22.00
04/02/2025	Travel meal, T. Burns	\$9.78
Total Expenses		\$504.70

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	1.10	\$340.00	\$374.00
Jesse Bair	Partner	10.70	\$900.00	\$9,630.00
Karen Dempski	Paralegal	0.20	\$340.00	\$68.00
Nathan Kuenzi	Associate	21.40	\$550.00	\$11,770.00
Timothy Burns	Partner	18.20	\$1,120.00	\$20,384.00

Total Due This Invoice: \$42,730.70