

LOWENSTEIN SANDLER LLPJEFFREY D. PROL (admitted *pro hac vice*)

jprol@lowenstein.com

BRENT WEISENBERG (admitted *pro hac vice*)

bweisenberg@lowenstein.com

COLLEEN M. RESTEL (admitted *pro hac vice*)

crestel@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

Facsimile: (973) 597-2400

KELLER BENVENUTTI KIM LLP

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

tkeller@kbbkllp.com

JANE KIM (Cal. Bar No. 298192)

jkim@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

Facsimile: (650) 636-9251

BURNS BAIR LLPTIMOTHY 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

**MONTHLY PROFESSIONAL FEE
STATEMENT FOR BURNS BAIR LLP
[AUGUST 2025]**

TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:

NOTICE IS HEREBY GIVEN that Burns Bair LLP (“**Burns Bair**”), special insurance
counsel to The Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman

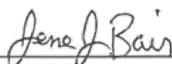
Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement for the Period of August 1, 2025 through August 31, 2025 (the “**Monthly Fee Statement**”). Pursuant to the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. 170] (the “**Interim Fee Order**”)¹ entered by the Court on June 23, 2023, and the Agreed Order Amending Procedures For Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. 2101] (the “**Amended Fee Order**”) entered by the Court on June 27, 2025, the total legal fees and costs expended by Burns Bair on account of the Committee is as follows:

Period	Fees	Expenses	Total
August 1, 2025 through August 31, 2025	\$48,607.00	\$1,618.72	\$50,225.72
Net Total Allowed Payments this Statement Period: (70% of Fees and 100% of Costs)	\$34,024.90	\$1,618.72	\$35,643.62

The itemized billing statement for the fees and costs billed is attached hereto as **Exhibit A**. Notice Parties have ten (10) days from the date of service of this Monthly Fee Statement to file an objection thereto. If no objection is filed, Burns Bair may file a certificate of no objection (or if an Objection was timely served, a certificate of partial objection) with the Court after which the Debtor, without further order of the Court, shall pay Burns Bair an amount equal to the lesser of: (1) 70% of the fees and 100% of the expenses requested in the Monthly Fee Statement, and (2) if an Objection was served, 70% of the fees and 100% of the expenses to which there was no Objection no later than five (5) business days after the filing of the relevant certificate.

Dated: September 30, 2025

BURNS BAIR LLP

By: 
Jesse J. Bair
*Special Insurance Counsel for the Official
Committee of Unsecured Creditors*

¹ Capitalized terms not otherwise defined shall have the meaning ascribed to them in the Interim Fee Order.

EXHIBIT A

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 9/26/2025

Bill # : 02025

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/7/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments, strategy, and next-steps (.6);	0.60	\$540.00
8/8/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, strategy, and next-steps (1.0);	1.00	\$900.00
8/28/2025	Timothy Burns	Participate in state court counsel meeting re Committee mediation strategy (1.0);	1.00	\$1,120.00
Totals for Committee Meetings			2.60	\$2,560.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/7/2025	Jesse Bair	Review fee examiner's interim report (.1);	0.10	\$90.00
8/7/2025	Jesse Bair	Provide instructions to N. Kuenzi re upcoming interim fee hearing (.1);	0.10	\$90.00
8/12/2025	Nathan Kuenzi	Prepare for fee application hearing (1.8);	1.80	\$990.00
8/26/2025	Jesse Bair	Review and edit monthly fee statement and correspond with Committee professionals re same (.2);	0.20	\$180.00
8/26/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and correspond with J. Bair re same (.3);	0.30	\$102.00
Totals for Fee Applications			2.50	\$1,452.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/13/2025	Nathan Kuenzi	Participate in fee application hearing before Judge Lafferty (.4);	0.40	\$220.00

8/13/2025	Timothy Burns	Participate in status hearing re case resolution (1.1);	1.10	\$1,232.00
8/20/2025	Jesse Bair	Participate in status conference in the district court insurance action (.7);	0.70	\$630.00
8/20/2025	Timothy Burns	Attend status conference in insurance adversary proceeding (.7);	0.70	\$784.00
8/26/2025	Timothy Burns	Attend JCCP hearing re Chubb's intervention motion re lift stay cases (1.4);	1.40	\$1,568.00
8/27/2025	Timothy Burns	Attend hearing in District Court re insurance appeals briefing schedule (.2);	0.20	\$224.00
Totals for Hearings			4.50	\$4,658.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/1/2025	Karen Dempksi	Docket/calendar case management conference (.1);	0.10	\$34.00
8/1/2025	Timothy Burns	Finalize comments re insurance proposal (.7);	0.70	\$784.00
8/1/2025	Jesse Bair	Review and edit insurance Plan memo (.4);	0.40	\$360.00
8/1/2025	Jesse Bair	Review notice of insurance status conference and related correspondence re same (.1);	0.10	\$90.00
8/4/2025	Jesse Bair	Review Order on debtor's motion to continue confirmation hearing and re-set confirmation schedule, notice of status conference, and related correspondence re same (.2);	0.20	\$180.00
8/7/2025	Jesse Bair	Participate in call with state court counsel re insurance lift stay developments (.1);	0.10	\$90.00
8/8/2025	Jesse Bair	Participate in call with B. Wiesenberg re the debtor's mediation letter and potential Committee response to same (.2); research in connection with same and draft summary for B. Wiesenberg concerning potential response (.4);	0.60	\$540.00
8/8/2025	Jesse Bair	Review correspondence with Committee professionals and state court counsel re outcome of status conference and mediation issues (.1);	0.10	\$90.00
8/10/2025	Jesse Bair	Review the insurers' notices of appeal re lift stay ruling and related correspondence with Committee professionals and state court counsel re same (.2);	0.20	\$180.00
8/11/2025	Timothy Burns	Prepare memo re response to Diocese's mediation assertions (.9);	0.90	\$1,008.00
8/11/2025	Timothy Burns	Participate in conference with B. Weisenberg re status hearing preparations and strategy (.4); participate in call with state court counsel re same (.2);	0.60	\$672.00

8/11/2025	Jesse Bair	Review correspondence with Committee professionals re mediation strategy presentation (.1);	0.10	\$90.00
8/11/2025	Nathan Kuenzi	Analyze insurance coverage issues re potential lift stay cases (1.3);	1.30	\$715.00
8/12/2025	Jesse Bair	Review Committee letter to the Court re mediation and status issues (.1);	0.10	\$90.00
8/13/2025	Timothy Burns	Review transcript of status hearing (1);	1.00	\$1,120.00
8/13/2025	Timothy Burns	Prepare for status hearing re case resolution (2.4);	2.40	\$2,688.00
8/13/2025	Timothy Burns	Participate in conference with Committee professionals re strategy for upcoming status hearing re case resolution (1.2);	1.20	\$1,344.00
8/13/2025	Timothy Burns	Participate in post-hearing conferences with Committee professionals re hearing outcome and next-steps (.4); participate in calls with state court counsel re same (1.1);	1.50	\$1,680.00
8/14/2025	Timothy Burns	Review correspondence with B. Wiesenberg and state court counsel re status hearing outcome and case strategy (.2);	0.20	\$224.00
8/15/2025	Nathan Kuenzi	Draft revised case coverage chart (1.0);	1.00	\$550.00
8/15/2025	Nathan Kuenzi	Participate in call with B. Weisenberg re upcoming meet and confer with RCBO and state court counsel re lift stay cases (.1);	0.10	\$55.00
8/15/2025	Nathan Kuenzi	Prepare for meet and confer with RCBO and state court counsel re lift stay case selection (.8);	0.80	\$440.00
8/15/2025	Timothy Burns	Participate in call with J. Prol re conference with Debtor re lift stay cases (.2);	0.20	\$224.00
8/15/2025	Timothy Burns	Participate in conference with N. Kuenzi re status hearing and ongoing case insurance issues (.2);	0.20	\$224.00
8/15/2025	Timothy Burns	Review and respond to correspondence with N. Kuenzi re meet and confer with Debtor re lift stay cases (.2);	0.20	\$224.00
8/15/2025	Karen Dempksi	Docket/calendar continued status conference and reconsider motion (.1);	0.10	\$34.00
8/15/2025	Timothy Burns	Participate in call with state court counsel re lift stay issues (.2);	0.20	\$224.00
8/15/2025	Nathan Kuenzi	Participate in conference with T. Burns re ongoing case insurance issues (.2);	0.20	\$110.00
8/16/2025	Timothy Burns	Review and respond to correspondence with state court counsel re lift stay insurance issues (.4); review and respond to correspondence with BB team re same (.2);	0.60	\$672.00

8/16/2025	Jesse Bair	Review correspondence with Committee professionals, state court counsel, and the Committee re status conference outcome in the bankruptcy case, strategy, and next-steps (.2);	0.20	\$180.00
8/16/2025	Jesse Bair	Correspond with BB team re upcoming status conference in the insurance district court action (.1);	0.10	\$90.00
8/16/2025	Nathan Kuenzi	Analyze California law re all sums with stacking and pro rata allocation methods in connection with ongoing case insurance issues (1.8);	1.80	\$990.00
8/16/2025	Nathan Kuenzi	Review email from T. Burns on research project with respect to RCBO position on test cases and draft response (.2);	0.20	\$110.00
8/17/2025	Jesse Bair	Review correspondence with state court counsel re insurance issues in connection with lift stay cases and related research summary in connection with same (.2);	0.20	\$180.00
8/17/2025	Nathan Kuenzi	Continue analyzing California caselaw on all sums with stacking and pro rata allocation methodologies in connection with ongoing case issues (2.2); draft memo summarizing research results (1.1);	3.30	\$1,815.00
8/18/2025	Timothy Burns	Participate in call with state court counsel re case insurance strategy (.8);	0.80	\$896.00
8/19/2025	Nathan Kuenzi	Analyze discovery issues relevant to upcoming hearing with Judge Corley on joint status report (1.8); draft summary re same (.6);	2.40	\$1,320.00
8/20/2025	Jesse Bair	Review lift stay appellate scheduling orders and relating information re four lift stay appeals (.2);	0.20	\$180.00
8/20/2025	Jesse Bair	Prepare for insurance status conference, including review of prior status reports, case management plans, and discovery exchanged to date and draft outline in connection with same (1.8);	1.80	\$1,620.00
8/20/2025	Timothy Burns	Prepare for status conference in insurance adversary (1.4);	1.40	\$1,568.00
8/20/2025	Karen Dempksi	Docket/calendar notice of appeal by Continental (.1);	0.10	\$34.00
8/20/2025	Nathan Kuenzi	Further review of prior case management statements and draft summary re same for use in upcoming insurance case status conference (.4);	0.40	\$220.00
8/20/2025	Nathan Kuenzi	Revise and update assessment re discovery completed to date in insurance declaratory judgment action (.3);	0.30	\$165.00

8/20/2025	Nathan Kuenzi	Analyze all insurer lift stay appellate filings and draft summary re pending proceedings, deadlines, and related appellate issues (1.3);	1.30	\$715.00
8/21/2025	Timothy Burns	Correspondence re test case meet and confer (.2);	0.20	\$224.00
8/22/2025	Jesse Bair	Review and respond to correspondence with state court counsel and Committee professionals re insurance lift stay issues (.2);	0.20	\$180.00
8/22/2025	Jesse Bair	Review the insurers' statement of issues on appeal and designation of the record and correspond with Committee professionals re same and appellate strategy (.2);	0.20	\$180.00
8/22/2025	Nathan Kuenzi	Review and respond to correspondence with state court counsel re lift stay insurance issues (.4); review and respond to correspondence with BB team re same (.3);	0.70	\$385.00
8/22/2025	Nathan Kuenzi	Analyze California law re duty to pay judgments in insolvent policy periods (1.3);	1.30	\$715.00
8/25/2025	Jesse Bair	Review minutes from prior insurance status conference and related correspondence re continued status conference (.1);	0.10	\$90.00
8/25/2025	Timothy Burns	Review correspondence with state court counsel and Chubb re Chubb's intervention in coordinated proceeding (.2);	0.20	\$224.00
8/25/2025	Timothy Burns	Review insurers' intervention papers in JCCP re RCBO lift stay cases (.5);	0.50	\$560.00
8/25/2025	Timothy Burns	Legal research re insurers' intervention papers in JCCP re RCBO lift stay cases (.8);	0.80	\$896.00
8/25/2025	Timothy Burns	Review and respond to additional correspondence with state court counsel re insurers' intervention papers in JCCP re RCBO lift stay cases (.4);	0.40	\$448.00
8/25/2025	Jesse Bair	Review correspondence with state court counsel and Chubb re Chubb's motion to intervene in the JCCP and related hearing in connection with same (.2);	0.20	\$180.00
8/25/2025	Jesse Bair	Review correspondence with the insurers and Committee professionals re lift stay appellate briefing (.1);	0.10	\$90.00
8/26/2025	Jesse Bair	Review the insurers' motion to intervene in the JCCP and accompanying exhibits (.2); review related correspondence with state court counsel and Committee professionals re same and upcoming hearing (.2);	0.40	\$360.00
8/26/2025	Jesse Bair	Review the debtor's counter letter and associated exhibits (.4);	0.40	\$360.00

8/26/2025	Alexander Castro	Research California law re circumstances in which an insurer can move to intervene in underlying case against insured and send summary re: same to T. Burns (1.1);	1.10	\$517.00
8/26/2025	Timothy Burns	Research and analysis of (2.3); and memo to file regarding (.5) insurance issues relating to Pacific Insurers' motion to intervene in JCCP re lift stay cases;	2.80	\$3,136.00
8/26/2025	Timothy Burns	Review RCBO's counter letter (.3); participate in call with state court counsel re same (.2);	0.50	\$560.00
8/26/2025	Nathan Kuenzi	Analyze RCBO settlement letter as respects insurance assignment (.3);	0.30	\$165.00
8/27/2025	Timothy Burns	Participate in conferences with Lowenstein re appeals briefing schedule and mediation issues (.8);	0.80	\$896.00
8/27/2025	Timothy Burns	Correspondence with Lowenstein re appeals briefing schedule hearing (.2); correspondence with internal team re same (.2);	0.40	\$448.00
8/27/2025	Timothy Burns	Brief review re letter from Pacific insurers re insurance appeal briefing schedule (.2); begin preparing for hearing before Judge Corley re same (.2);	0.40	\$448.00
8/27/2025	Jesse Bair	Review Chubb's status letter to Judge Corley (.1); review and respond to correspondence with Committee professionals re same and strategy for upcoming status conference (.2);	0.30	\$270.00
8/27/2025	Jesse Bair	Review and edit mediation strategy presentation to state court counsel (.5); correspond with Committee professionals re same (.2);	0.70	\$630.00
8/27/2025	Timothy Burns	Participate in conference with state court liaison counsel re JCCP hearing and insurer intervention motion (.2);	0.20	\$224.00
8/27/2025	Nathan Kuenzi	Analyze Oakland appeals dockets and filings to date in preparation for case management conference before Judge Corley (.4);	0.40	\$220.00
8/27/2025	Nathan Kuenzi	Analyze insurance coverage figures and draft additional slides for Committee mediation strategy presentation (.8);	0.80	\$440.00
8/28/2025	Timothy Burns	Review and revise insurance portion of Committee mediation strategy presentation deck (.4);	0.40	\$448.00
8/28/2025	Karen Dempksi	Docket/calendar appeal deadlines and hearing date (.1);	0.10	\$34.00

8/28/2025	Nathan Kuenzi	Additional analysis of insurer exposure assessments and negotiations to date in connection with ongoing mediation negotiations (.8);	0.80	\$440.00
8/28/2025	Jesse Bair	Review and edit revised version of strategy presentation to state court counsel (.3);	0.30	\$270.00
8/29/2025	Jesse Bair	Review correspondence with state court counsel re insurance lift stay issues (.1);	0.10	\$90.00
8/30/2025	Jesse Bair	Analyze insurer arguments re intervention in the lift stay selection process and draft summary re potential responses to same (.9);	0.90	\$810.00
8/31/2025	Jesse Bair	Review correspondence with state court counsel and Committee professionals re the insurers' motion to intervene in the lift stay selection process and potential responses to same (.2);	0.20	\$180.00
Totals for Insurance Recovery Activities			47.10	\$39,937.00

Total Hours and Fees	56.70	\$48,607.00
-----------------------------	--------------	--------------------

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/12/2025	Hotel, T. Burns (2 nights)	\$804.00
08/13/2025	Travel meal, T. Burns	\$8.05
08/13/2025	Delta Airlines, T. Burns (MSN-SFO, Aug. 13-14)	\$735.78
08/14/2025	Travel meal, T. Burns	\$35.85
08/14/2025	Travel meal, T. Burns	\$15.04
08/14/2025	Airport parking, T. Burns	\$20.00
Total Expenses		\$1,618.72

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	1.10	\$470.00	\$517.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Jesse Bair	Partner	11.20	\$900.00	\$10,080.00
Karen Dempsey	Paralegal	0.40	\$340.00	\$136.00
Nathan Kuenzi	Associate	19.60	\$550.00	\$10,780.00
Timothy Burns	Partner	24.10	\$1,120.00	\$26,992.00

Total Due This Invoice: \$50,225.72