

FOLEY & LARDNER LLP

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55 Spear Street Tower, Suite 1900

San Francisco, CA 94105

*Counsel for the Debtor
and Debtor in Possession***UNITED STATES BANKRUPTCY COURT****NORTHERN DISTRICT OF CALIFORNIA****OAKLAND DIVISION**

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

**TWENTY SEVENTH MONTHLY FEE
STATEMENT OF FOLEY & LARDNER LLP,
AS GENERAL BANKRUPTCY COUNSEL TO
THE DEBTOR, FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE
PERIOD OF AUGUST 1, 2025 THROUGH
AUGUST 31, 2025**

Judge: Hon. William J. Lafferty

**Objection Deadline: October 10, 2025
4:00 p.m. (Pacific Time)**

[No Hearing Requested]

Name of Applicant:	Foley & Lardner LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Effective as of May 8, 2023 by Order entered June 15, 2023 [Dkt. No. 145]
Period for Which Compensation and Reimbursement is Sought:	August 1, 2025 – August 31, 2025
Amount of Compensation Sought as Actual, Reasonable and Necessary: ¹	\$413,853.50
30% Holdback:	\$124,156.05
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: ²	\$12,666.70
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought:	\$302,364.15

PRELIMINARY STATEMENT

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

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

¹ Foley & Lardner LLP has agreed not to bill the Debtor for the time it takes its attorneys to travel to or from the Bay Area and such amounts are not included in this Monthly Fee Statement.

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

³ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Orders (defined below).

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

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

6 On May 26, 2023, the Debtor filed the *Debtor’s Motion for an Order Establishing Procedures for*
7 *Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 70] (the
8 “Compensation Procedures Motion”). The Court granted the Compensation Procedures Motion on June
9 23, 2023, entering the *Order Authorizing Procedures for Interim Compensation and Reimbursement of*
10 *Expenses of Professionals* [Dkt. No. 170] (the “Original Compensation Procedures Order”). The Court
11 entered its *Agreed Order Amending Procedures for Interim Compensation and Reimbursement of*
12 *Expenses of Professionals* on June 27, 2025 [Dkt. No. 2101] (the “Amended Compensation Procedures
13 Order” and collectively with the Original Compensation Procedures Order, the “Compensation Procedures
14 Orders”).

15 Foley & Lardner LLP (“Foley” or “Applicant”), as general bankruptcy counsel to the Debtor,
16 hereby submits its twenty seventh monthly fee statement (the “Monthly Fee Statement”) for allowance of
17 payment of compensation for professional services rendered and for reimbursement of actual and
18 necessary expenses incurred for the period commencing August 1, 2025 through and including August
19 31, 2025 (the “Fee Period”) pursuant to the Compensation Procedures Orders.

20 By this Monthly Fee Statement, Foley seeks (i) a monthly interim allowance of compensation in
21 the amount of \$413,853.50 and actual and necessary expenses in the amount of \$12,666.70 for a total
22 allowance of \$426,520.20 and (ii) payment of \$289,697.45 (70% of the allowed fees pursuant to the
23 Compensation Procedures Orders) and reimbursement of \$12,666.70 (100% of the allowed expenses
24 pursuant to the Compensation Procedures Orders) for a total payment of \$302,364.15 for the Fee Period.

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

26 Attached as **Exhibit 1** is the name of each of Foley’s professionals and paraprofessionals who
27 performed services for the Debtor in connection with this Chapter 11 Case during the Fee Period covered
28

TWENTY SEVENTH MONTHLY FEE STATEMENT OF FOLEY & LARDNER LLP

1 by this Monthly Fee Statement and the hourly rate and total fees for each professional during the Fee
2 Period.

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

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

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

8 **NOTICE AND OBJECTION PROCEDURES**

9 In accordance with the Compensation Procedures Orders, each Notice Party shall have until the
10 tenth (10th) day (or the next business day if such day is not a business day) following service of this
11 Monthly Fee Statement (the "**Objection Deadline**") to serve an objection to the Monthly Fee Statement on
12 Foley and each of the other Notice Parties.

13 Upon the expiration of the Objection Deadline, the Applicant shall file a certificate of no objection
14 with the Court, after which the Debtor is authorized and directed to pay the Applicant an amount equal to
15 70% of the fees and 100% of the expenses requested in this Monthly Fee Statement.

16 If an objection is properly filed, the Debtor shall be authorized and directed to pay the Applicant
17 70% of the fees and 100% of the expenses not subject to an objection.

18
19 DATED: September 30, 2025

FOLEY & LARDNER LLP

Eileen R. Ridley
Shane J. Moses
Ann Marie Uetz
Matthew D. Lee
Geoffrey S. Goodman
Mark C. Moore

23 /s/ Shane J. Moses

24 SHANE J. MOSES

25 *Counsel for the Debtor*
26 *and Debtor in Possession*

EXHIBIT 1**Compensation by Professional
August 1, 2025 – August 31, 2025**

Name of Professional Individual	Initials	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Angelica M. Lopez	AMPL	Associate, 2024	\$550	2.80	\$1,540.00
Evan L. Hamling	ELH	Associate, 2021	\$650	1.10	\$715.00
Gerald S. Kerska	GSK	Associate, 2017	\$800	4.30	\$3,440.00
Mary Rofaeil	MRL	Associate, 2021	\$675	25.90	\$17,482.50
Mason Roberts	MR	Associate, 2018	\$795	11.40	\$9,063.00
Michael W. Berg	MWBE	Associate, 2023	\$600	6.80	\$4,080.00
Nora J. McGuffey	NMCG	Associate, 2020	\$700	0.40	\$280.00
Nicholas S. Covek	NSCO	Associate, 2023	\$575	11.80	\$6,785.00
Alissa M. Nann	AMN	Of Counsel, 2006	\$1,050	0.20	\$210.00
Shane J. Moses	SJM	Of Counsel, 2005	\$875	78.80	\$68,950.00
Janelle C. Harrison	JCH	Paralegal, N/A	\$330	18.00	\$5,940.00
Kerry A Farrar	KAFA	Paralegal, N/A	\$450	5.10	\$2,295.00
Ann Marie Uetz	AMUE	Partner, 1993	\$1,050	74.10	\$77,805.00
Eileen R. Ridley	ERR	Partner, 1990	\$1,100	35.30	\$38,830.00
Emil P. Khatchatourian	EPK	Partner, 2009	\$875	24.30	\$21,262.50
Geoffrey S. Goodman	GSG	Partner, 1999	\$1,050	9.90	\$10,395.00
Jeff R. Blease	JRBL	Partner, 1988	\$1,375	3.70	\$5,087.50
Lisa F. Glahn	LFG	Partner, 2000	\$1,200	2.70	\$3,240.00
Mark C. Moore	MCM	Partner, 2010	\$925	15.30	\$14,152.50
Matthew D. Krueger	MDK	Partner, 2006	\$925	13.40	\$12,395.00
Matthew D. Lee	MDL	Partner, 2006	\$875	61.40	\$53,725.00
Thomas F. Carlucci	TFCA	Partner, 1987	\$1,375	1.70	\$2,337.50
Alan R. Ouellette	AROU	Senior Counsel, 2010	\$875	2.60	\$2,275.00
Elizabeth P. Mazzocco	EPM	Senior Counsel, 2014	\$840	33.20	\$27,888.00
Tamar N. Dolcourt	TND	Special Counsel, 2009	\$800	29.60	\$23,680.00
TOTAL				473.80	\$413,853.50

EXHIBIT 2

**Compensation by Category
August 1, 2025 – August 31, 2025**

Category	Hours Billed this Fee Period	Total for Fee Statement
002 – Asset Sales/ 363 Sales	10.70	\$9,150.00
003 – Automatic Stay	3.20	\$2,800.00
004 – Bankruptcy Litigation/Adversary Proceedings	48.30	\$40,358.50
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues	2.30	\$1,792.50
006 – Case Administration (Docket Updates, WIP and calendar)	14.40	\$4,970.00
008 – Communications with Client	48.60	\$47,470.00
011 – Cash Management	1.50	\$1,312.50
016 – General Case Strategy (includes calls with client and team calls)	150.30	\$130,335.00
017 – Hearings and Court Matters	6.70	\$5,902.50
018 – Non-Bankruptcy Litigation	28.00	\$26,782.50
020 – Retention/Billing/Fee Applications for Debtor Professionals	19.40	\$16,437.50
021 – Retention/ Fee Applications: Ordinary Course Professionals	10.20	\$8,392.50
022 – Retention/ Fee Applications: Other Professionals	1.30	\$1,137.50
025- U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Reports	3.30	\$2,615.00
026 – Unsecured Creditors Issues/Communications/Meetings	4.70	\$4,112.50
027 – Real Estate and Real Property Issues	7.10	\$6,212.50
031 – Insurance Issues (coverage, includes adversary proceeding)	98.60	\$92,858.00
032 – Rule 2004 Motions/Discovery/Subpoenas	3.60	\$2,617.50
034 – Other Motion Practice	5.80	\$3,677.00
035 – General Counsel Matters	2.30	\$1,710.00
038 – Mediation	3.50	\$3,210.00
TOTAL	473.80	\$413,853.50

EXHIBIT 3

**Expense by Category
August 1, 2025 – August 31, 2025**

Costs/Expense	Amount Billed
Electronic Legal Research Services	\$186.70
LSS – eDiscovery Services	\$12,400.00
Service Fees	\$80.00
TOTAL	\$12,666.70

EXHIBIT 4

**Time Detail Entries
August 1, 2025 – August 31, 2025**

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

Date: September 30, 2025
Invoice No.: 51154147
Our Ref. No.: 100845-0402

Services through August 31, 2025

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	\$413,853.50
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Total Expenses:	\$12,666.70
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Amount Due:	\$426,520.20
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Please reference your invoice number 51154147 with your remittance
payable to Foley & Lardner LLP. Payment is due promptly upon receipt
of this invoice.

Federal Employer Number:
39-0473800

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 2

Foley & Lardner LLP

September 30, 2025

Professional Services Detail**002 Asset Sales/ 363 Sales**

08/01/25	MDL	Revise motion for divestment of CMS position per client comments.	0.20	\$175.00
08/01/25	MWBE	Discuss divestment motion with M. Lee.	0.10	\$60.00
08/03/25	MWBE	Draft declaration in support of 363 sale per M. Lee.	0.60	\$360.00
08/05/25	AMN	Correspondence with M. Lee regarding CCSS amended bylaws and pledge agreements.	0.20	\$210.00
08/05/25	MDL	Evaluate possible amendments to pledge agreements with CCSS and RCC.	0.20	\$175.00
08/05/25	MDL	Revise A. Bardos declaration in support of CMS divestment motion.	0.30	\$262.50
08/07/25	MDL	Revise pledge agreements and related documents.	0.50	\$437.50
08/07/25	MWBE	Follow up with M. Lee regarding declaration in support of 363 motion.	0.10	\$60.00
08/13/25	MDL	Revise pledge agreement documents for CCSS divestment.	0.60	\$525.00
08/14/25	MWBE	Follow up with M. Lee regarding divestment motion.	0.10	\$60.00
08/18/25	MDL	Strategize with S. Moses regarding CMS divestment motion preview for Committee counsel and timing of hearing.	0.20	\$175.00
08/18/25	SJM	Confirm timing for motion to divest CCSS interest (.2); call with M. Lee regarding motion (.3).	0.50	\$437.50
08/19/25	MDL	Email exchange with J. Prol (Lowenstein) regarding CCSS divestment motion.	0.40	\$350.00
08/19/25	MDL	Finalize CCSS divestment motion.	0.20	\$175.00
08/19/25	SJM	Revise motion to divest CCSS assets and declaration in support of same (2.6); prepare notice of hearing on same (.4); work on proposed order on same (.7); finalize motion papers for same (.9).	4.60	\$4,025.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 3

Foley & Lardner LLP

September 30, 2025

08/25/25	MDL	Prepare for meet and confer with Committee counsel regarding CMS divestiture motion.	0.10	\$87.50
08/25/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding diligence requests for CMS divestiture motion.	0.30	\$262.50
08/25/25	MDL	Telephone conference with Lowenstein team (J. Prol, C. Restel, M. Kaplan) regarding Committee questions on CMS divestiture motion.	0.30	\$262.50
08/25/25	SJM	Call with M. Lee and Committee counsel regarding motion to divest CCSS interest.	0.30	\$262.50
08/26/25	MDL	Email exchange with C. Restel (Lowenstein) regarding Committee document demands in connection with CMS divestiture motion.	0.10	\$87.50
08/28/25	MDL	Strategize with Foley team regarding responses to Committee diligence requests in connection with CMS divestiture motion.	0.30	\$262.50
08/29/25	MDL	Email exchange with M. Kaplan (Lowenstein) regarding request to adjourn hearing on CMS divestiture motion and diligence requests in connection with same.	0.50	\$437.50
Task Total:			10.70	\$9,150.00

003 Automatic Stay

08/14/25	SJM	Review transcripts of hearings on automatic stay.	1.20	\$1,050.00
08/20/25	EPK	Analyze Curtis factors relevant to stay relief.	0.20	\$175.00
08/26/25	SJM	Review appeal documents in connection with insurer appeals of lift stay order (.6); email to E. Ridley and A. Uetz regarding same (.1).	0.70	\$612.50
08/27/25	SJM	Attend district court status conference regarding appeals of lift stay order (.9); call with E. Ridley and E. Mazzocco regarding same (.2).	1.10	\$962.50
Task Total:			3.20	\$2,800.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 4

Foley & Lardner LLP

September 30, 2025

004 Bankruptcy Litigation/Adversary Proceedings

08/01/25	GSG	Review Committee's proposed deadlines regarding remaining adversary.	0.10	\$105.00
08/04/25	GSG	Review correspondence regarding deadlines for remaining adversary.	0.20	\$210.00
08/06/25	GSG	Strategize with M. Lee regarding remaining adversary schedule.	0.10	\$105.00
08/08/25	GSG	Review Committee notice of appeal and election regarding alter ego case.	0.10	\$105.00
08/08/25	SJM	Analyze Committee motion for reconsideration of dismissal of subcon adversary proceeding.	1.40	\$1,225.00
08/11/25	GSG	Review motion to reconsider on alter ego dismissal (.3); analyze responses to same (.6); correspondence with team regarding same (.2).	1.10	\$1,155.00
08/11/25	SJM	Email correspondence with A. Uetz and M. Lee regarding Committee appeal and motion to reconsider dismissal of adversary proceeding (.3); draft detailed update to client regarding same (1.2).	1.50	\$1,312.50
08/12/25	GSG	Review draft of initial disclosures in remaining adversary (.3); edit same (.3); correspondence with S. Moses regarding same (.1).	0.70	\$735.00
08/12/25	SJM	Prepare initial disclosures for remaining adversary proceeding (2.4); revise same based on comments from G. Goodman (.8).	3.20	\$2,800.00
08/13/25	GSG	Review Committee's Rule 26 Disclosures.	0.10	\$105.00
08/14/25	GSG	Review correspondence from Committee regarding meet and confer on 26(a) disclosures (.1); telephone conference with S. Moses regarding same (.2).	0.30	\$315.00
08/14/25	SJM	Emails regarding meet and confer on Debtor initial disclosures.	0.30	\$262.50
08/15/25	GSG	Prepare for call with Committee on restricted assets discovery (.3); participate in same (.4); telephone conferences with M. Lee and S. Moses regarding same (.4); review next steps in same (.6); telephone conference with D. Goroff regarding alter ego case issues (.2).	1.90	\$1,995.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 5

Foley & Lardner LLP

September 30, 2025

08/15/25	SJM	Prepare for meet and confer call in adversary proceeding (.6); meet and confer call with G. Goodman, M. Kaplan, and C. Restel (.4); follow-up call with G. Goodman regarding discovery (.3).	1.30	\$1,137.50
08/17/25	SJM	Analyze approach to opposition to motion to reconsider (.6); email correspondence with G. Goodman and N. McGuffey regarding same (.1).	0.70	\$612.50
08/18/25	AMPL	Strategize researching the standard for reconsideration under FRCP Rules 59 and 60.	0.20	\$110.00
08/18/25	GSG	Prepare for meeting regarding arguments in opposition to Committee's motion to reconsider dismissal of non-Debtor affiliate claims (.7); participate in same (.3).	1.00	\$1,050.00
08/18/25	NMCG	Analyze response to Committee motion for reconsideration.	0.40	\$280.00
08/18/25	SJM	Provide direction to A. Lopez on research needed for opposition to motion to reconsider dismissal of adversary proceeding.	0.70	\$612.50
08/18/25	SJM	Call with G. Goodman and N. McGuffey regarding opposition to motion to reconsider dismissal (.3); begin work on same (.5).	0.80	\$700.00
08/19/25	AMPL	Research the standard for reconsideration under FRCP Rules 59 and 60.	1.10	\$605.00
08/19/25	SJM	Direct M. Berg regarding discovery responses.	0.40	\$350.00
08/20/25	AMPL	Research the standard for reconsideration under FRCP Rules 59 and 60.	1.50	\$825.00
08/20/25	EPK	Email correspondence with A. Uetz regarding adversary proceeding jurisdiction issues and related Ninth Circuit case law analysis.	0.20	\$175.00
08/20/25	GSG	Review research on Rule 59 and Rule 60 issues for motion for reconsideration.	0.20	\$210.00
08/20/25	MWBE	Begin drafting discovery demands for adversary proceeding.	0.80	\$480.00
08/20/25	SJM	Analyze research regarding standard for motion to reconsider, including reviewing cases on same (1.7); email to G. Goodman regarding same (.2).	1.90	\$1,662.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 6

Foley & Lardner LLP

September 30, 2025

08/21/25	GSG	Telephone conference with S. Moses regarding response to motion for reconsideration (.2); review issues related to same (.3).	0.50	\$525.00
08/21/25	MRL	Email correspondence with the Foley team regarding the Committee's motion for reconsideration in the adversary proceeding (.3); analyze the Committee's motion for reconsideration (.5).	0.80	\$540.00
08/21/25	MWBE	Finish drafting discovery demands for adversary proceeding and share with S. Moses.	1.70	\$1,020.00
08/21/25	MWBE	Attention to chart of requests for production in adversary proceeding.	0.10	\$60.00
08/21/25	SJM	Call with G. Goodman regarding opposition to motion to reconsider dismissal and discovery in remaining adversary case (.3); detailed email to M. Rofaail regarding structure of arguments for opposition to motion to reconsider (1.2).	1.50	\$1,312.50
08/22/25	GSG	Review draft discovery to Committee (.2); edit same (.1); telephone conference with A. Uetz regarding response to motion for reconsideration (.2).	0.50	\$525.00
08/22/25	MRL	Begin drafting the Debtor's response to the Committee's motion for reconsideration in the adversary proceeding.	0.30	\$202.50
08/22/25	SJM	Revise discovery requests to Committee for remaining adversary proceeding (4.1); further revisions based on comments from G. Goodman (.3); email to Committee counsel regarding service of discovery (.3).	4.70	\$4,112.50
08/24/25	MRL	Continue drafting the Debtor's response to the Committee's motion for reconsideration in the adversary proceeding.	0.40	\$270.00
08/25/25	GSG	Review donation issue and related correspondence.	0.20	\$210.00
08/25/25	MRL	Continue drafting the Debtor's response to the Committee's motion for reconsideration in the adversary proceeding.	1.60	\$1,080.00
08/26/25	JCH	Calendar deadline regarding joint discovery disputes letter in original appeal case.	0.20	\$66.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 7

Foley & Lardner LLP

September 30, 2025

08/26/25	MRL	Continue drafting the Debtor's response to the Committee's motion for reconsideration in the adversary proceeding (1.2); email correspondence with S. Moses and G. Goodman regarding revisions to the response (.3); revise the response to conform to G. Goodman's comments (1.8).	3.30	\$2,227.50
08/26/25	SJM	Review Committee discovery requests in surviving adversary proceeding (.6); email to client regarding same (.2).	0.80	\$700.00
08/26/25	SJM	Strategize with G. Goodman regarding appeal issues and opposition to motion to reconsider.	0.20	\$175.00
08/27/25	GSG	Review restricted assets adversary issues (.3); correspondence with A. Uetz regarding same (.1).	0.40	\$420.00
08/27/25	GSG	Review draft of response to motion for reconsideration (.3); edit same (.2); correspondence with S. Moses regarding same (.1); review Committee discovery regarding CCSS and related filings and correspondence (.3).	0.90	\$945.00
08/27/25	SJM	Email correspondence with M. Berg providing detailed direction regarding preparation of discovery responses for adversary proceeding.	0.70	\$612.50
08/27/25	SJM	Revise opposition to Committee motion to reconsider dismissal.	6.80	\$5,950.00
08/28/25	JCH	Calendar briefing deadlines and hearing in new appeals.	0.50	\$165.00
Task Total:			48.30	\$40,358.50

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

08/06/25	MRL	Draft an email to the Foley team regarding the Debtor's response to the motion for late-filed claims (.2); revise the Debtor's response to conform to M. Moore's comments (.4); email correspondence with J. Harrison regarding filing the Debtor's response (.1).	0.70	\$472.50
08/07/25	MRL	Analyze the insurers' objection to the motion to allow late-filed claims.	0.20	\$135.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 8

Foley & Lardner LLP

September 30, 2025

08/11/25	MDL	Telephone conference with B. Perkins (Peiffer) regarding request for continuance of hearing on motion to allow late-filed claim.	0.20	\$175.00
08/11/25	SJM	Emails with M. Lee regarding approach to taking motion for leave regarding late-filed claim off calendar.	0.30	\$262.50
08/12/25	MDL	Telephone conference with B. Perkins (Peiffer), G. Albert (Keller), and R. Singh (courtroom deputy) regarding stipulation to continue hearing on motion for late-filed claim.	0.10	\$87.50
08/12/25	MDL	Strategize with S. Moses regarding procedure for handling continuance of hearing on motion to approve late-filed claim.	0.10	\$87.50
08/13/25	MDL	Strategize with Foley team for presentation of stipulation to continue hearing on motion to allow late-filed claim.	0.20	\$175.00
08/13/25	MDL	Email exchange with G. Albert (Keller) and B. Perkins (Peiffer Wolf) regarding stipulation to continue hearing on motion to allow late-filed claim.	0.20	\$175.00
08/13/25	MDL	Analyze proposed stipulation to continue hearing on motion to allow late-filed claim.	0.10	\$87.50
08/13/25	MRL	Confer with M. Moore regarding the hearing on the motion to allow late claims.	0.20	\$135.00
Task Total:			2.30	\$1,792.50

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

08/01/25	JCH	Update daily docket report.	0.50	\$165.00
08/04/25	JCH	Revise timeline and master case calendar (.5); update daily docket report (.5).	1.00	\$330.00
08/06/25	EPK	Review updated master case calendar and key dates timeline (.1); assess near-term bankruptcy reporting filings (.1).	0.20	\$175.00
08/06/25	JCH	Update timeline and master case calendar (.2); file opposition to motion to allow late filing of claims (.2); update daily docket report (.5).	0.90	\$297.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 9

Foley & Lardner LLP

September 30, 2025

08/07/25	JCH	Prepare (.4) and file (.1) Notice of Core Service List as of August 7, 2025; update daily docket report (.5).	1.00	\$330.00
08/08/25	JCH	Update daily docket report.	0.50	\$165.00
08/08/25	JCH	Calendar hearing and response deadline to Committee's motion to reconsider.	0.50	\$165.00
08/11/25	JCH	Update daily docket report.	0.50	\$165.00
08/12/25	JCH	Update timeline and master calendar (.5); prepare zip files with pleadings for hearing on interim fee applications and status conference and email same to A. Uetz (.5); file notice of supplemental OCP retention (.2); update daily docket report (.5).	1.70	\$561.00
08/14/25	JCH	Update daily docket report.	0.50	\$165.00
08/15/25	JCH	Update daily docket report.	0.50	\$165.00
08/17/25	EPK	Review critical case dates and deadlines relating to estate reporting obligations (.1); evaluate whether any Bankruptcy Code deadlines require further extension (.1).	0.20	\$175.00
08/18/25	JCH	File Fourth CTN Period Report (.5); update daily docket report (.5).	1.00	\$330.00
08/19/25	JCH	Update daily docket report.	0.50	\$165.00
08/20/25	JCH	Update timeline and master case calendar (.5); calendar hearing on and response deadline to Debtor's motion related to pledge agreements (.2); update daily docket report (.5).	1.20	\$396.00
08/21/25	JCH	Update daily docket report.	0.50	\$165.00
08/22/25	JCH	Prepare (.4) and file (.1) certificate of no objection to fifth motion to extend time to file removals and upload proposed order; update daily docket report (.5).	1.00	\$330.00
08/25/25	JCH	Update daily docket report.	0.50	\$165.00
08/27/25	JCH	Calendar extended removal deadline (.2); update daily docket report (.5).	0.70	\$231.00
08/28/25	JCH	Update daily docket report.	0.50	\$165.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 10

Foley & Lardner LLP

September 30, 2025

08/29/25	JCH	Update daily docket report.	0.50	\$165.00
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Task Total:	14.40	\$4,970.00
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008 Communications with Client

08/01/25	MCM	Conference call with client parties regarding case status and go-forward strategy.	1.00	\$925.00
08/01/25	MDL	Begin drafting letter to Bishop Barber regarding case endgame strategy.	1.10	\$962.50
08/01/25	MDL	Telephone conference with M. Kemner regarding case endgame strategy.	0.90	\$787.50
08/01/25	MDL	Telephone conference with A. Bardos regarding CMS divestment 363 motion.	0.20	\$175.00
08/01/25	MDL	Email exchange with A. Bardos regarding CMS divestment motion.	0.20	\$175.00
08/05/25	MDL	Email exchange with R. Ozer regarding harvesting of documents responsive to Committee supplemental discovery requests.	0.20	\$175.00
08/05/25	MDL	Email exchange with A. Bardos regarding declaration in support of CMS divestment motion.	0.10	\$87.50
08/05/25	MDL	Continue drafting letter to Bishop Barber regarding recommendation on case conclusion strategy.	1.70	\$1,487.50
08/06/25	AMUE	Prepare for (.8) and meet with M. Kemner regarding settlement recommendation (1.2); follow-up debrief regarding settlement position (.9).	2.90	\$3,045.00
08/06/25	MCM	Review email correspondence with client parties regarding property sale issues.	0.40	\$370.00
08/06/25	MDL	Telephone conference with M. Kemner regarding possible case conclusion proposal.	1.20	\$1,050.00
08/06/25	MDL	Telephone conference with A. Bardos regarding privileged issues.	0.30	\$262.50
08/07/25	MDL	Analyze summary from A. Bardos regarding anticipated use of certain real estate as collateral.	0.20	\$175.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 11

Foley & Lardner LLP

September 30, 2025

08/08/25	AMUE	Email exchange with finance team regarding cash forecast as it relates to possible settlement terms.	0.40	\$420.00
08/08/25	AMUE	Review privileged communication from client leadership regarding possible source for settlement funding and response to same.	0.90	\$945.00
08/08/25	MDL	Email correspondence with M. Kemner regarding case conclusion options.	0.20	\$175.00
08/08/25	MDL	Revise summary of status conference to be sent to client.	0.30	\$262.50
08/08/25	SJM	Draft update to client regarding results of hearing.	0.80	\$700.00
08/11/25	AMUE	Draft communication to client regarding privileged matter relating to settlement (2.6); meeting with M. Kemner and E. Ridley regarding privileged insurance issue (.6); meeting with M. Kemner, A. Bardos and Foley team (who attended only part of the meeting) regarding privileged matter relating to settlement (1.8).	5.00	\$5,250.00
08/11/25	MDL	Telephone conference with M. Kemner and A. Bardos regarding case conclusion options (only joined for part of the call).	0.50	\$437.50
08/11/25	SJM	Call with A. Bardos regarding real estate issues and Committee motion to reconsider dismissal of adversary proceeding.	0.80	\$700.00
08/12/25	AMUE	Draft two privileged emails to client leadership regarding settlement issues and responses to same.	1.90	\$1,995.00
08/13/25	AMUE	Communication with A. Bardos regarding funding sources for settlement (.4); review communications with A. Bardos regarding source of funding (.5).	0.90	\$945.00
08/13/25	MDL	Email exchange with A. Bardos regarding revised pledge agreement documents for CCSS divestment.	0.10	\$87.50
08/13/25	SJM	Draft update to client on status conference.	0.70	\$612.50
08/14/25	MDL	Revise correspondence to client team regarding update on 8/13 status conference.	0.20	\$175.00
08/15/25	MDL	Email exchange with M. Kemner regarding insurance resolution considerations.	0.10	\$87.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 12

Foley & Lardner LLP

September 30, 2025

08/18/25	MDL	Telephone conference with M. Kemner and E. Ridley regarding negotiations with Committee and insurers over assignment and cash settlement terms.	0.70	\$612.50
08/18/25	MDL	Email exchange with M. Kemner regarding insurance contribution issue.	0.10	\$87.50
08/19/25	MCM	Call with M. Kemner regarding case issues.	0.40	\$370.00
08/20/25	AMUE	Analyze settlement options (1.6) and multiple communications with client leadership regarding same (1.2); draft privileged communication to client leadership regarding privileged settlement issue (1.1).	3.90	\$4,095.00
08/20/25	MDL	Telephone conference with M. Kemner and A. Bardos regarding proposal to be made to Committee.	1.20	\$1,050.00
08/20/25	SJM	Attend meeting with Foley team and client leadership regarding plan and settlement strategy.	1.10	\$962.50
08/21/25	AMUE	Finalize privileged letter to client leadership regarding settlement considerations, and communications with leadership regarding same.	2.20	\$2,310.00
08/21/25	MCM	Email correspondence with M. Kemner regarding case issues.	0.30	\$277.50
08/21/25	MDL	Revise letter to Bishop Barber regarding strategy for endgame and proposal to Committee.	1.50	\$1,312.50
08/22/25	AMUE	Prepare for (1.0) and meet with (1.0) Bishop Barber, M. Kemner, E. Ridley, and M. Moore regarding settlement proposal; debrief from meeting (.6); revisions to correspondence to Bishop Barber regarding privileged settlement issue (.9).	3.50	\$3,675.00
08/22/25	ERR	Prepare for (.3) and attend (1.0) strategics meeting including insurance issues with client (Bishop Barber and M. Kemner).	1.30	\$1,430.00
08/22/25	MCM	Analyze case strategy and related issues with client team and Foley.	1.00	\$925.00
08/22/25	MDL	Email exchange with Bishop Barber and M. Kemner regarding legal analysis of privileged issue concerning First Amendment.	0.30	\$262.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 13

Foley & Lardner LLP

September 30, 2025

08/25/25	MDL	Email exchange with M. Kemner regarding settlement letter to Committee.	1.00	\$875.00
08/26/25	AMUE	Draft privileged communication to client leadership regarding Prop 51 issue (1.4); telephone meeting with M. Kemner regarding same (.5).	1.90	\$1,995.00
08/26/25	AMUE	Finalize memorandum to client leadership regarding privileged issues.	1.00	\$1,050.00
08/26/25	EPK	Review email correspondence with the RCBO client team regarding Proposition 51 ruling by Judge Chatterjee.	0.20	\$175.00
08/26/25	MDL	Email correspondence to M. Kemner and A. Bardos regarding Committee objection to Century Urban OCP retention.	0.30	\$262.50
08/26/25	MDL	Email correspondence to A. Bardos and M. Kemner regarding Committee diligence requests in connection with CMS divestiture motion.	0.20	\$175.00
08/27/25	MDL	Telephone conference with M. Kemner and A. Uetz regarding settlement strategy.	0.60	\$525.00
08/28/25	AMUE	Meeting with M. Kemner, A. Bardos, E. Ridley, M. Lee and J. Breall regarding privileged issue relating to insurance claims.	1.20	\$1,260.00
08/28/25	MDL	Telephone conference with M. Kemner regarding insurance litigation strategy.	0.90	\$787.50
08/29/25	MDL	Telephone conference with A. Bardos regarding Committee diligence requests in connection with CMS divestiture motion.	0.60	\$525.00
Task Total:			48.60	\$47,470.00

011 Cash Management

08/21/25	SJM	Confer with G. Goodman regarding approach to potential new restricted gift (.2); email to A. Uetz regarding same (.3); email to client regarding same (.4).	0.90	\$787.50
08/25/25	SJM	Analyze issues related to potential restricted donation (.3); email to G. Goodman regarding same (.1).	0.40	\$350.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 14

Foley & Lardner LLP

September 30, 2025

08/26/25	SJM	Email to M. Kemner regarding response to potential donor.	0.20	\$175.00
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Task Total:	1.50	\$1,312.50
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016 General Case Strategy (includes team calls)

08/01/25	MDL	Strategize with A. Uetz and M. Moore regarding advice to client on case endgame strategy.	0.50	\$437.50
08/02/25	TND	Provide information on fees incurred to date at A. Uetz's request.	0.30	\$240.00
08/03/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$540.00
08/04/25	MDL	Strategize for status conference.	0.20	\$175.00
08/04/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$540.00
08/04/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	1.10	\$742.50
08/04/25	SJM	Review meet and confer correspondence from Committee counsel (.4); email correspondence with A. Uetz and M. Lee regarding same (.3); email to Court regarding continuance of status conference (.3); email to insurers regarding continuance of status conference (.3).	1.30	\$1,137.50
08/05/25	MCM	Email correspondence with Foley team regarding case status.	0.30	\$277.50
08/05/25	MRL	Continue summarizing daily docket activity and upcoming deadlines for client (.3); update weekly timeline and slides per case developments and activity on numerous dockets (.3).	0.60	\$405.00
08/06/25	AMUE	Draft privileged document regarding possible settlement terms.	1.70	\$1,785.00
08/06/25	MCM	Analyze issues regarding case strategy.	0.70	\$647.50
08/06/25	MDL	Strategize with A. Uetz regarding case conclusion proposal.	0.50	\$437.50
08/06/25	MRL	Finalize summarizing daily docket activity and upcoming deadlines for client.	0.40	\$270.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 15

Foley & Lardner LLP

September 30, 2025

08/07/25	AMUE	Analyze privileged issue relating to settlement options.	1.50	\$1,575.00
08/07/25	SJM	Finalize letter to Court regarding settlement approach.	0.70	\$612.50
08/08/25	AMUE	Confer with team regarding privileged issue relating to status conference (.8); analyze consideration relating to possible settlement scenarios (3.1).	3.90	\$4,095.00
08/08/25	MDL	Strategize with Foley team regarding case conclusion options in light of Judge Lafferty's comments at status conference.	0.40	\$350.00
08/08/25	SJM	Call with M. Lee and A. Uetz (for part) regarding results of status conference hearing.	0.60	\$525.00
08/10/25	MRL	Review email correspondence from A. Uetz regarding status of settlement for the case.	0.20	\$135.00
08/11/25	MCM	Analysis of other case outcomes in advance of strategy discussion on potential resolution.	0.70	\$647.50
08/11/25	MCM	Conference call with Foley team regarding case resolution.	0.50	\$462.50
08/11/25	MDL	Evaluate Committee letter regarding mediation and settlement and possible responses to same with Foley team.	0.80	\$700.00
08/11/25	MDL	Strategize with A. Uetz regarding case conclusion options following call with client.	0.50	\$437.50
08/11/25	MDL	Prepare for client call regarding case conclusion options.	1.00	\$875.00
08/11/25	MRL	Email correspondence with A. Uetz regarding separately incorporated parishes.	0.20	\$135.00
08/11/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.70	\$472.50
08/12/25	AMUE	Analyze privileged issue regarding settlement position.	4.10	\$4,305.00
08/12/25	MCM	Attention to follow-up on status conference.	0.50	\$462.50
08/12/25	MDL	Evaluate data to supply to client in support of recommended case conclusion strategy.	0.70	\$612.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 16

Foley & Lardner LLP

September 30, 2025

08/12/25	MRL	Analyze the plan and disclosure statement in the Rochester diocese case to provide update to the Foley team (1.5); email correspondence with A. Uetz and M. Lee regarding the plan terms in the Rochester case (.5).	2.00	\$1,350.00
08/12/25	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to client.	1.00	\$675.00
08/12/25	MRL	Update weekly timeline and slides per case developments and activity on numerous dockets (.4); summarize daily docket activity and upcoming deadlines for client (.8).	1.20	\$810.00
08/12/25	SJM	Assist with preparation for 8/13 hearings.	0.40	\$350.00
08/12/25	SJM	Call with A. Uetz regarding Diocese of Rochester settlement (.2); analyze Diocese of Rochester plan and related documents (2.3); draft email summary of same (.5).	3.00	\$2,625.00
08/13/25	MCM	Call with Foley team to discuss strategy for status conference and related issues.	1.00	\$925.00
08/13/25	MDL	Strategize with Foley team regarding status conference and case conclusion strategy (1.0); follow up on items from call (1.3).	2.30	\$2,012.50
08/13/25	MDL	Telephone conference with A. Uetz and S. Moses following status conference regarding next steps in developing case conclusion strategy (partial).	0.30	\$262.50
08/13/25	SJM	Call with A. Uetz and M. Lee to prepare for status conference (1.1); follow-up call after status conference (.3).	1.40	\$1,225.00
08/14/25	AMUE	Analyze settlement scenarios designed to break logjam in chapter 11 case (2.2); analyze Rochester settlement to inform settlement discussion with client (1.8).	4.00	\$4,200.00
08/14/25	MRL	Research issues regarding parishes contributing to diocese plans in the Buffalo case (.5); draft an email to the Foley team regarding the outcome of the research (.2); review and summarize certain articles regarding parish closures in Canada (.4); draft an email to M. Lee and A. Uetz regarding the same (.2).	1.30	\$877.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 17

Foley & Lardner LLP

September 30, 2025

08/14/25	SJM	Analyze research regarding parish challenges to sale of assets in other dioceses (.6); email to case team regarding same (.1).	0.70	\$612.50
08/15/25	AMUE	Analyze privileged issue concerning First Amendment (1.8); meeting with Foley team regarding same (.6).	2.40	\$2,520.00
08/15/25	EPK	Email correspondence with M. Krueger and Foley restructuring team regarding privileged issue concerning First Amendment.	0.20	\$175.00
08/15/25	MCM	Internal correspondence regarding case strategy and related issues (.4); analysis of issues related to go-forward strategy (.5).	0.90	\$832.50
08/15/25	MDK	Confer with A. Uetz and team regarding privileged First Amendment issues (.5); coordinate research of privileged issue concerning First Amendment and begin analyzing the same (1.1).	1.60	\$1,480.00
08/15/25	MDL	Case strategy call with A. Uetz regarding case conclusion options and client review of same.	0.50	\$437.50
08/15/25	MDL	Strategize with Foley team regarding privileged issue concerning First Amendment.	0.50	\$437.50
08/15/25	NSCO	Confer with M. Krueger regarding research into privileged issue concerning First Amendment.	0.40	\$230.00
08/15/25	NSCO	Conduct research into privileged issue concerning First Amendment.	0.70	\$402.50
08/15/25	SJM	Call with A. Ouelette regarding prior research on privileged issue concerning First Amendment.	0.30	\$262.50
08/15/25	SJM	Attend Foley team meeting regarding privileged religious freedom issues.	0.50	\$437.50
08/16/25	MDK	Continue reviewing research on privileged issues concerning First Amendment and coordinate further research.	0.60	\$555.00
08/16/25	MDL	Strategize with M. Krueger regarding privileged issue concerning First Amendment.	0.40	\$350.00
08/16/25	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	\$675.00
08/16/25	NSCO	Conduct research into privileged issue concerning First Amendment.	4.60	\$2,645.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 18

Foley & Lardner LLP

September 30, 2025

08/17/25	MCM	Draft letter to Committee regarding case status and settlement.	0.80	\$740.00
08/17/25	MDK	Continue researching privileged issue concerning First Amendment.	2.20	\$2,035.00
08/17/25	NSCO	Conduct research into privileged issue concerning First Amendment.	2.90	\$1,667.50
08/17/25	NSCO	Correspond and confer with M. Krueger regarding research into privileged issue concerning First Amendment.	0.90	\$517.50
08/17/25	SJM	Review past research related to privileged religious freedom issues (1.2); emails to M. Krueger regarding same (.2).	1.40	\$1,225.00
08/18/25	ELH	Confer with T. Dolcourt regarding privileged research matter.	1.10	\$715.00
08/18/25	GSK	Confer with M. Krueger regarding potential free exercise challenges.	0.40	\$320.00
08/18/25	GSK	Analyze potential free exercise and RFRA challenges to exempt sacred property.	2.50	\$2,000.00
08/18/25	MCM	Revise draft of Committee letter and settlement offer.	1.20	\$1,110.00
08/18/25	MDK	Analyze research on privileged issue concerning First Amendment (1.4); confer regarding researching California law regarding defenses to enforcement of judgment against dioceses (.6); confer with Foley team regarding privileged issue concerning First Amendment and further research needed (.6).	2.60	\$2,405.00
08/18/25	MDL	Follow-up strategy call with Foley team regarding privileged issue concerning First Amendment.	0.80	\$700.00
08/18/25	MDL	Strategize with Foley team regarding privileged issue concerning First Amendment (only joined for portion of call).	0.50	\$437.50
08/18/25	SJM	Provide comments to letter to Committee regarding offer.	0.80	\$700.00
08/18/25	SJM	Assist with research on privileged religious freedom issues (1.8); call with T. Dolcourt, M. Krueger and M. Lee (for part) regarding same (.9).	2.70	\$2,362.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 19

Foley & Lardner LLP

September 30, 2025

08/18/25	TND	Calls (2x) with Foley team on privileged research matter (1.5); call with E. Hamlin on similar research (.2); conduct research on privileged matter (4.7).	6.40	\$5,120.00
08/19/25	GSK	Continue analysis of potential free exercise and RFRA challenges to exempt sacred property, including review of Supreme Court and Ninth Circuit precedent (.9); draft summary of analysis for M. Krueger (.5).	1.40	\$1,120.00
08/19/25	MCM	Review revised draft of Committee letter and approve for sending.	0.50	\$462.50
08/19/25	MDK	Further research privileged issues concerning First Amendment and draft memorandum analyzing these issues.	4.70	\$4,347.50
08/19/25	MDL	Evaluate written work product to be sent to client regarding case conclusion options.	0.40	\$350.00
08/19/25	MDL	Revise best and final letter to Committee.	1.70	\$1,487.50
08/19/25	MRL	Email correspondence with A. Uetz regarding the client update email.	0.20	\$135.00
08/19/25	NSCO	Correspond with M. Krueger regarding legal research and memorandum regarding privileged issue.	0.20	\$115.00
08/19/25	TND	Research on privileged issues related to case status and next steps.	1.40	\$1,120.00
08/20/25	MCM	Conference call with Foley team regarding bankruptcy status.	0.50	\$462.50
08/20/25	MDK	Emails regarding further revisions to analysis of privileged issues concerning First Amendment (.4); further revise memorandum (1.1).	1.50	\$1,387.50
08/20/25	MDL	Revise summary of client's authorized terms of proposal to Committee.	0.30	\$262.50
08/20/25	MDL	Revise memorandum regarding privileged issue concerning First Amendment.	2.90	\$2,537.50
08/20/25	MRL	Update weekly timeline and slides per case developments and activity on numerous dockets (.4); summarize daily docket activity and upcoming deadlines for client (.6).	1.00	\$675.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 20

Foley & Lardner LLP

September 30, 2025

08/20/25	MRL	Email correspondence with A. Uetz regarding status of the Rochester diocese case.	0.20	\$135.00
08/20/25	NSCO	Correspond within firm regarding memorandum on privileged matters.	0.50	\$287.50
08/20/25	NSCO	Revise memorandum regarding privileged matters.	1.40	\$805.00
08/20/25	SJM	Review draft memo regarding privileged religious freedom issues.	0.80	\$700.00
08/20/25	SJM	Finalize letter to client and letter to Committee regarding offer.	0.40	\$350.00
08/20/25	TND	Draft section of memo on privileged matter regarding California law.	4.30	\$3,440.00
08/21/25	MDL	Strategize with Foley team regarding strategy for endgame and proposal to Committee.	0.70	\$612.50
08/22/25	MDK	Emails regarding finalizing memorandum for client regarding privileged issues concerning First Amendment.	0.20	\$185.00
08/22/25	MDL	Strategize with A. Uetz regarding endgame proposal to Committee.	0.70	\$612.50
08/22/25	MDL	Revise letter regarding endgame proposal to Committee.	0.40	\$350.00
08/22/25	NSCO	Review correspondence from M. Lee regarding memorandum analyzing legal considerations on privileged matter.	0.20	\$115.00
08/22/25	TND	Review case status memo (.2); updates to letter to Committee (.3).	0.50	\$400.00
08/23/25	MCM	Correspondence regarding case strategy and potential settlement offer.	0.40	\$370.00
08/23/25	TND	Review letter to Committee regarding settlement offer.	0.20	\$160.00
08/24/25	MDL	Strategize with A. Uetz regarding client directives on endgame strategy.	0.60	\$525.00
08/25/25	AMUE	Draft settlement letter to Committee and revise same in multiple consultations with M. Kemner (5.8); meeting with J. Prol regarding same (.7); communication with client leadership to obtain final approval (1.5).	8.00	\$8,400.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 21

Foley & Lardner LLP

September 30, 2025

08/25/25	MCM	Work on issues in connection with last and final settlement offer to Committee, including calculations of comparative case outcomes.	0.80	\$740.00
08/25/25	MDL	Revise settlement letter to Committee and exhibits to same.	3.40	\$2,975.00
08/25/25	MRL	Analyze the Syracuse diocese case to provide an update to the Foley team (.4); confer with M. Lee regarding reviewing certain diocese cases to provide an update to the client (.2); analyze certain diocese cases to update the memorandum to the client (1.1).	1.70	\$1,147.50
08/25/25	SJM	Strategize with M. Lee regarding approach to real property sales, Century Urban employment, and related issues.	0.70	\$612.50
08/26/25	AMUE	Analyze Prop 51 issue.	1.50	\$1,575.00
08/26/25	GSG	Review initial draft of objection to motion for reconsideration (.3); comment on same (.3); telephone conference with S. Moses regarding same (.2).	0.80	\$840.00
08/26/25	MCM	Analysis of other case outcomes and recent developments.	0.60	\$555.00
08/26/25	MDL	Strategize with Foley team regarding impact of state court ruling on Proposition 51 and comparative fault on settlement negotiations.	1.50	\$1,312.50
08/26/25	MDL	Analyze state court ruling on Proposition 51 and comparative fault.	0.40	\$350.00
08/26/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.50	\$337.50
08/26/25	SJM	Call with Foley team regarding privileged case strategy matter.	0.60	\$525.00
08/27/25	AMUE	Analyze settlement strategy in light of recent court decision (1.5); meeting with M. Kemner regarding same (1.0); analyze Prop 51 decision (1.2); review recent case settlements to inform position (1.3).	5.00	\$5,250.00
08/27/25	MDL	Strategize with Foley team regarding pending motions, Committee objections, and end-of-case tactics.	0.90	\$787.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 22

Foley & Lardner LLP

September 30, 2025

08/27/25	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to client.	0.70	\$472.50
08/28/25	MRL	Analyze recent ruling in the Syracuse diocese bankruptcy case to provide an update to the Foley team.	0.20	\$135.00
08/28/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.40	\$270.00
08/29/25	AMUE	Meeting with Foley team regarding settlement strategy and related matters (1.0); debrief privileged issue with M. Lee (.5).	1.50	\$1,575.00
08/29/25	GSG	Telephone conference with team regarding open issues and next steps (partial).	0.80	\$840.00
08/29/25	MCM	Conference call with Foley team regarding case strategy and related issues.	1.00	\$925.00
08/29/25	MDL	Prepare for (.3) and strategize with Foley team for September 9 hearing, Committee objections to OCP retention of Century Urban and CMS divestiture motion, and other planned motions and case actions (1.0).	1.30	\$1,137.50
08/29/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.60	\$405.00
08/29/25	SJM	Meeting with Foley team regarding upcoming tasks and strategy.	1.00	\$875.00
08/29/25	SJM	Review information regarding Diocese of Syracuse settlement(.4); email to case team regarding implications for settlement (.2).	0.60	\$525.00
08/29/25	TND	Status call with team regarding upcoming projects.	1.00	\$800.00

Task Total: 150.30 \$130,335.00

017 Hearings and Court Matters

08/08/25	EPK	Advise M. Lee of developments in the JCCP 5108 state court proceedings for today's status conference in front of Judge Lafferty.	0.30	\$262.50
08/08/25	MDL	Strategize for status conference on adversary proceeding schedule and mediation issue.	0.40	\$350.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 23

Foley & Lardner LLP

September 30, 2025

08/08/25	MDL	Appear at status conference for Debtor.	1.10	\$962.50
08/08/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding points to be covered at status conference and to confirm agreement on same.	0.10	\$87.50
08/08/25	SJM	Prepare for status conference in main case and adversary proceeding (.8); attend status conference (1.2).	2.00	\$1,750.00
08/13/25	MCM	Attend status conference in RCBO bankruptcy case (partial).	0.80	\$740.00
08/13/25	MDL	Appear for Debtor at status conference in main chapter 11 case.	1.00	\$875.00
08/13/25	SJM	Attend status conference hearing.	1.00	\$875.00
Task Total:			6.70	\$5,902.50

018 Non-Bankruptcy Litigation

08/04/25	AROU	Respond to correspondence from counsel for co-defendant regarding lift-stay order.	0.10	\$87.50
08/05/25	AROU	Attention to motion to stay filed by co-defendant.	0.20	\$175.00
08/05/25	EPK	Review email correspondence with M. Gately regarding certain co-defendant cases.	0.20	\$175.00
08/05/25	SJM	Respond to counsel for co-defendant regarding selection of test cases.	0.30	\$262.50
08/06/25	EPK	Review motion filed by co-defendant seeking stay in the JCCP 5108 with respect to any cases with RCBO that are chosen for trial (.1); email correspondence with A. Ouellette regarding same (.1).	0.20	\$175.00
08/06/25	TFCA	Review emails regarding state court trial and issue regarding co-counsel.	0.20	\$275.00
08/08/25	EPK	Email correspondence with R. Simons regarding Plaintiffs' proposed cases for trials.	0.20	\$175.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 24

Foley & Lardner LLP

September 30, 2025

08/10/25	EPK	Email correspondence with A. Uetz regarding insurance coverage review relating to six cases selected by Plaintiffs for trial following entry of lift-stay order (.2); review email correspondence from P. Glaessner regarding JCCP 5101 claims impacting Oakland (.1).	0.30	\$262.50
08/11/25	AROU	Attention to status of JCCP 5108 cases proposed for trial setting.	0.80	\$700.00
08/11/25	EPK	Confer with A. Uetz regarding Plaintiffs' selection of test cases and relevant JCCP 5108 dates (.2); email correspondence with E. Mazzocco regarding insurance coverage analysis relating to test cases (.3); confer with A. Ouellette regarding test cases requiring substitutions of counsel (.1); email correspondence with T. Halloran of Murphy Pearson regarding RCWC insurance issues relating to JCCP 5108 (.1).	0.70	\$612.50
08/11/25	KAFA	Communications with A. Ouellette regarding Foley's representation in any JCCP 5101 cases and research same.	0.60	\$270.00
08/12/25	EPK	Email correspondence with A. Uetz and E. Mazzocco regarding JCCP 5108 test cases and related insurance coverage issues.	0.20	\$175.00
08/13/25	AROU	Call from Z. Rutman, assigned defense counsel retained by Chubb.	0.20	\$175.00
08/14/25	AROU	Attention to Plaintiffs' opposition to motion to stay filed by co-defendant.	0.30	\$262.50
08/14/25	EPK	Email correspondence with Lowenstein team regarding selection of test cases for trial (.1); confer with E. Mazzocco regarding same (.2); review Plaintiffs' liaison counsel's omnibus opposition to co-defendant's motion to continue stay in JCCP 5108 proceedings (.2).	0.50	\$437.50
08/15/25	EPK	Conference call with RCWC's state court litigation counsel to discuss insurance coverage issues relating to RCWC claims (.3); conference call with R. Simons and Committee counsel regarding insurance issues with certain proposed test cases (.3); review rescheduling order issued in the JCCP 5108 regarding next CMC (.1).	0.70	\$612.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 25

Foley & Lardner LLP

September 30, 2025

08/16/25	EPK	Email correspondence with R. Simons regarding Plaintiffs' revised proposed list of test cases and next joint case management statement to be submitted next week.	0.10	\$87.50
08/17/25	EPK	Email correspondence with R. Simons and A. Uetz regarding Plaintiffs' proposed list of test cases and representations to be made to the state court judge in the next joint case management statement for JCCP 5108 (.3); separate email correspondence with A. Uetz and E. Mazzocco regarding insurance issues relating to same (.1).	0.40	\$350.00
08/18/25	EPK	Coordinate with E. Ridley regarding next case management conference in JCCP 5108 (.1); email correspondence with D. Zamora regarding draft of the joint case management statement for the next CMC in JCCP 5108 (.2); email correspondence with E. Ridley regarding communications with Chubb's assigned counsel relating to all matters tendered to Chubb (.1); confer with A. Uetz, M. Lee, and E. Ridley regarding tendered RCWC cases and Plaintiffs' selection of test cases (.3).	0.70	\$612.50
08/19/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding RCBO's insert for the joint case management statement to be submitted in JCCP 5108 (.1); email correspondence with E. Ridley regarding next JCCP 5108 CMC on Tuesday, August 26, 2025 (.1); email correspondence with R. Simons regarding next proposed meet-and-confer call relating to JCCP 5108 test cases (.1).	0.30	\$262.50
08/20/25	EPK	Email correspondence with Foley restructuring and insurance teams regarding proposed meet-and-confer call with Plaintiffs' counsel relating to JCCP 5108 issues (.1); email correspondence with R. Simons relating to same (.2); work on RCBO's insert for the next JCCP 5108 joint case management statement (.7); email correspondence with Foley restructuring and insurance teams regarding proposed CMC statement (.4); email correspondence with D. Zamora regarding CMC statement (.1); confirm transmission of policies and tender letters to RCWC's state court counsel (.1); email correspondence with E. Ridley regarding communications with Chubb (.1).	1.70	\$1,487.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 26

Foley & Lardner LLP

September 30, 2025

08/20/25	TFCA	Review emails regarding insurer counsel and selection of cases.	0.20	\$275.00
08/21/25	AROU	Attention to status of discovery in JCCP 5108 matters.	0.30	\$262.50
08/21/25	EPK	Confer with A. Uetz and E. Ridley regarding comments to JCCP 5108 CMC statement (.5); email correspondence with R. Simons and J. Prol of Lowenstein regarding scheduling of next meet-and-confer call to discuss test cases (.2); revise CMC statement to incorporate comments from A. Uetz and E. Ridley (.6); further email correspondence with Foley team regarding same (.7); confer with defense liaison counsel D. Zamora regarding next CMC and RCBO's position (.4); review cumulative redline of CMC statement (.2); review email correspondence with Z. Rutman of Taylor Anderson regarding notice of association of counsel (.1); confer with E. Ridley regarding same (.1).	2.80	\$2,450.00
08/21/25	TFCA	Review emails regarding insurer counsel regarding 6 cases for trial.	0.20	\$275.00
08/22/25	AROU	Attention to order denying omnibus motion regarding Proposition 51.	0.20	\$175.00
08/22/25	AROU	Attention to JCCP 5108 CMC statement.	0.20	\$175.00
08/22/25	EPK	Email correspondence with E. Ridley, E. Mazzocco, and A. Uetz regarding Taylor Anderson's proposed association of counsel for insured test cases moving forward in JCCP 5108 (.2); email correspondence with liaison counsel for Plaintiffs and Institutional Defendants regarding RCBO's proposed CMC statement insert (.3); review as-filed version of the joint CMC statement (.2); review letter from Clyde & Co. regarding defense counsel association (.1); email correspondence with Foley team regarding proposed response to same (.4).	1.20	\$1,050.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 27

Foley & Lardner LLP

September 30, 2025

08/25/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding ex parte motion to intervene filed by RCBO's insurance carriers (.2); confer with Foley restructuring and insurance teams regarding same (.4); review email from J. Blease regarding Proposition 51 ruling issued by Judge Chatterjee (.1); separate email correspondence with E. Mazzocco regarding response letter to Chubb (.2).	0.90	\$787.50
08/26/25	EPK	Review ex parte application for leave to intervene filed by certain insurance carriers of RCBO (.1); email correspondence with J. Blease regarding same (.2); coordinate with E. Ridley prior to the JCCP 5108 CMC (.5); confer with D. Zamora of Weintraub Tobin regarding RCBO's position (.3); attend the monthly JCCP 5108 CMC (1.4); post-CMC email correspondence with J. Blease and A. Uetz regarding trial scheduling issues and Proposition 51 ruling (.4); draft summary of JCCP 5108 issues for update to be provided to the RCBO client team (.8); conference call with Foley litigation team and bankruptcy team to discuss the Proposition 51 ruling (.7); update Proposition 51 summary for client team (.4); review L. Glahn's analysis of the Proposition 51 ruling and practical implications of same (.1).	4.90	\$4,287.50
08/26/25	ERR	Prepare for (.4) and attend (1.4) case management and ex parte hearing in Alameda Superior Court in JCCP matter.	1.80	\$1,980.00
08/26/25	ERR	Review Alameda Superior Court's ruling on application of Prop 51 for effect regarding insurance issues.	1.00	\$1,100.00
08/26/25	JRBL	Communications with E. Khatchatourian, L. Glahn, A. Uetz and E. Ridley regarding ramifications of state court decision on Prop 51 application to JCCP and effect on valuation of abuse cases.	0.80	\$1,100.00
08/26/25	JRBL	Analysis of JCCP 5108 decision on application of Prop 51 to abuse claims and effect on valuation of cases against RCBO.	0.40	\$550.00
08/26/25	KAFA	Pull verdict information from Clergy III for J. Blease.	0.30	\$135.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 28

Foley & Lardner LLP

September 30, 2025

08/26/25	LFG	Prepare for (.3) and participate in (.7) meetings with team on analysis of Judge Chatterjee's order on Prop 51; analyze order (.4); prepare client update on same (.4).	1.80	\$2,160.00
08/26/25	TFCA	Telephone call with Foley team regarding judge's decision on Prop 51 and strategy regarding same.	0.60	\$825.00
08/27/25	AROU	Attention to case management and stay-related orders in JCCP 5108.	0.30	\$262.50
08/27/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin and RCWC's counsel regarding revised list of JCCP 5108 cases to be reviewed independently by RCBO's and RCWC's separate counsel.	0.20	\$175.00
08/27/25	TFCA	Attention to emails regarding state court cases and related insurance issues.	0.50	\$687.50
08/28/25	EPK	Brief review of updated spreadsheets provided by R. Simons setting forth revised lists of Bucket 1, Bucket 2, and Bucket 3 cases in the JCCP 5108 to evaluate accuracy as to RCBO-related claims.	0.20	\$175.00
08/29/25	EPK	Email correspondence with R. Simons regarding further meet-and-confer call regarding un-stayed cases (.1); email correspondence with A. Uetz and E. Ridley regarding same (.2).	0.30	\$262.50
Task Total:			28.00	\$26,782.50

020 Retention/Billing/Fee Applications for Debtor Professionals

08/06/25	SJM	Work on finalizing letter to D. Klauder regarding Foley interim fee application.	0.70	\$612.50
08/08/25	TND	Email correspondence with NERA on order approving employment and payment information needed.	0.30	\$240.00
08/13/25	AMUE	Prepare for (1.2) and appear at (1.8) hearing on motion to approve fee applications; prepare for (1.2) and appearance at (1.0) status conference.	5.20	\$5,460.00
08/13/25	SJM	Prepare for hearing on interim fee applications (.7); attend hearing (1.8).	2.50	\$2,187.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 29

Foley & Lardner LLP

September 30, 2025

08/14/25	JCH	Prepare omnibus certificate of no objection to Debtor professionals' June monthly fee statements.	0.80	\$264.00
08/14/25	TND	Draft motion to further amend interim comp order (3.2); review information on Hilco invoices (.2); email to Hilco contact on fee statement process (.2).	3.60	\$2,880.00
08/15/25	JCH	File omnibus certificate of no objection to Debtor professionals' June monthly fee statements.	0.20	\$66.00
08/15/25	SJM	Revise omnibus CNO for Debtor fee statements.	0.30	\$262.50
08/15/25	TND	Begin review of information for July fee statement.	0.30	\$240.00
08/17/25	TND	Further work on July fee statement.	0.50	\$400.00
08/19/25	TND	Further preparation of July fee statement to ensure compliance with U.S. Trustee guidelines (.9); emails with S. Steele regarding Hilco fees (.1).	1.00	\$800.00
08/20/25	MDL	Evaluate Committee's objection to Century Urban OCP retention.	0.10	\$87.50
08/20/25	TND	Call with S. Steele regarding Hilco fees (.2); further preparation of July fee statement to ensure compliance with U.S. Trustee guidelines (.4).	0.60	\$480.00
08/21/25	TND	Further preparation of Foley July statement to ensure compliance with U.S. Trustee guidelines.	0.80	\$640.00
08/26/25	TND	Emails with I. Velikova regarding fee applications.	0.20	\$160.00
08/27/25	TND	Email to I. Velikova (NERA) regarding payment question (.1); email to S. Steele regarding Hilco fees (.1).	0.20	\$160.00
08/28/25	TND	Email correspondence with S. Steele regarding Hilco fees.	0.10	\$80.00
08/29/25	JCH	Prepare draft of Foley monthly fee statement for July 2025.	0.50	\$165.00
08/29/25	SJM	Analyze issues regarding scope of Breall employment (.4); email to A. Uetz regarding approach to same (.3).	0.70	\$612.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 30

Foley & Lardner LLP

September 30, 2025

08/29/25	TND	Review NERA application for July fees (.3); email correspondence with J. Harrison regarding NERA and other applications (.2); email to I. Velikova regarding NERA fees (.1); further preparation of Foley July fee statement (.2).	0.80	\$640.00
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Task Total:	19.40	\$16,437.50
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021 Retention/Fee Applications: Ordinary Course Professionals

08/01/25	TND	Discuss Century Urban OCP retention with S. Moses.	0.30	\$240.00
08/05/25	TND	Follow up with A. Uetz on Century Urban OCP retention matters.	0.10	\$80.00
08/06/25	SJM	Review notice for OCP retention of Century Urban (.6); analyze process for modification of fee caps (.3); email to A. Uetz and T. Dolcourt regarding same (.2).	1.10	\$962.50
08/07/25	TND	Update notice of supplemental OCP retention for Century Urban to incorporate comments from A. Uetz and S. Moses (.3); draft order amending monthly cap provisions in OCP Order (.6); email to B. Sparkman on OCP paperwork (.1).	1.00	\$800.00
08/08/25	TND	Review comments from B. Sparkman to notice for OCP filing (.1); discuss same with Foley team (.2).	0.30	\$240.00
08/12/25	TND	Email communications with B. Sparkman on OCP documents for CU (.2); discuss same with A. Uetz (.1); finalize documents (.3).	0.60	\$480.00
08/19/25	MDL	Evaluate Committee objection to OCP retention of Century Urban and potential responses to same.	0.30	\$262.50
08/20/25	SJM	Analyze approach to Committee objection to Century Urban ordinary course employment (.2); email to T. Dolcourt, A. Uetz, and M. Lee regarding same (.1).	0.30	\$262.50
08/20/25	TND	Review process for resolving objections on OCP retention (.2); email correspondence with Foley team on same (.2).	0.40	\$320.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 31

Foley & Lardner LLP

September 30, 2025

08/25/25	TND	Review M. Kemner invoice for July (.3); email correspondence with M. Kemner regarding same (.2); email to A. Uetz on CU issue (.1).	0.60	\$480.00
08/26/25	MDL	Email exchange with Lowenstein regarding meet and confer on OCP retention of Century Urban.	0.20	\$175.00
08/26/25	TND	Review Committee objection to OCP retention of CU in detail (.3); prepare update to client (.3); discuss same with A. Uetz (.1); begin preparation of response (.3).	1.00	\$800.00
08/27/25	MDL	Strategize with Foley team regarding response to Committee objection to Century Urban OCP motion.	0.50	\$437.50
08/27/25	MDL	Telephone conference with J. Prol and B. Weisenberg (both of Lowenstein) regarding Committee objection to Century Urban OCP retention.	0.20	\$175.00
08/27/25	MDL	Evaluate Committee-proposed compromise on Century Urban OCP motion.	0.20	\$175.00
08/27/25	SJM	Call with M. Lee and Committee regarding Century Urban employment (.2); follow-up call with M. Lee regarding same (.1).	0.30	\$262.50
08/27/25	TND	Work on response to CU objection by Committee.	0.70	\$560.00
08/28/25	TND	Further work on response to Committee objection to CU retention as OCP.	2.10	\$1,680.00
Task Total:			10.20	\$8,392.50

022 Retention/Fee Applications: Other Professionals

08/04/25	SJM	Email to client regarding June professional fee statements.	0.60	\$525.00
08/17/25	SJM	Email to client regarding payment of June monthly fee statements.	0.40	\$350.00
08/21/25	SJM	Call with A. Bardos regarding professional fee payments and related issues.	0.30	\$262.50
Task Total:			1.30	\$1,137.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 32

Foley & Lardner LLP

September 30, 2025

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

08/11/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding preparation of fourth CTN Rule 2015.3 report.	0.40	\$350.00
08/12/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding unaudited CTN financials for fiscal year ending June 30, 2025 and compilation of Rule 2015.3 report.	0.20	\$175.00
08/13/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding proposed filing version of the fourth CTN Rule 2015.3 report.	0.20	\$175.00
08/14/25	EPK	Review proposed filing version of the fourth CTN Rule 2015.3 report (.2); email correspondence with A. Bardos regarding filing of same on Monday, August 18, 2025 (.1).	0.30	\$262.50
08/15/25	EPK	Email correspondence with counsel for CTN W. Smith of Binder & Malter and counsel for telecommunications licensor D. Cassidy of Alston & Bird regarding review and approval of fourth CTN Rule 2015.3 report.	0.10	\$87.50
08/18/25	EPK	Oversee filing and service of the fourth CTN Rule 2015.3 report (.3); email correspondence with D. Cassidy of Alston & Bird regarding approval of form of CTN Rule 2015.3 report (.1); email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding preparation of the July 2025 MOR (.2).	0.60	\$525.00
08/19/25	EPK	Email correspondence with D. Flanagan of VeraCruz regarding preliminary draft of the July 2025 MOR.	0.10	\$87.50
08/20/25	EPK	Review preliminary draft of July 2025 MOR package (.2); comment on July 2025 MOR form and exhibits (.3); email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding comments to the July 2025 MOR and approval of same for filing tomorrow (.3).	0.80	\$700.00
08/21/25	JCH	File monthly operating report for July 2025 (.4); circulate filed copy of same to client group (.1).	0.50	\$165.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 33

Foley & Lardner LLP

September 30, 2025

08/29/25	EPK	Email correspondence with D. Flanagan of VeraCruz and K. Farrar regarding July MOR supplements for distribution to the BRG team.	0.10	\$87.50
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Task Total:	3.30	\$2,615.00
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026 Unsecured Creditor Issues/Communications/Meetings

08/04/25	MDL	Evaluate Committee's proposed schedule for the remaining adversary proceeding.	0.30	\$262.50
08/04/25	MDL	Email exchange with C. Restel (Lowenstein) regarding proposed schedule for surviving adversary proceeding.	0.20	\$175.00
08/05/25	MDL	Email exchange with C. Restel (Lowenstein) regarding case schedule and fact witness disclosure.	0.20	\$175.00
08/07/25	MDL	Email exchange with Lowenstein attorneys regarding agreement on adversary proceeding schedule and compromise on privileged issues concerning First Amendment.	0.20	\$175.00
08/08/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding next steps following status conference.	0.40	\$350.00
08/11/25	MDL	Email exchange with C. Restel (Lowenstein) regarding stipulation on adversary proceeding schedule.	0.20	\$175.00
08/11/25	MDL	Analyze documents demonstrating Committee knowledge of Adventus purpose and assets before A. Bardos June 2025 deposition.	0.30	\$262.50
08/11/25	MDL	Analyze Committee draft of adversary proceeding pre-trial schedule.	0.20	\$175.00
08/14/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding discovery deadlines in chapter 11 case and related confirmation matters.	0.50	\$437.50
08/14/25	MDL	Email exchange with M. Kaplan (Lowenstein) regarding discovery deadlines in chapter 11 case.	0.20	\$175.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 34

Foley & Lardner LLP

September 30, 2025

08/24/25	MDL	Revise proposed settlement letter to Committee per M. Kemner comments.	2.00	\$1,750.00
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Task Total:	4.70	\$4,112.50
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027 Real Estate and Real Property Issues

08/01/25	SJM	Emails with client regarding Century Urban (.4); emails with case team regarding same (.2); provide advice to client leadership and Century Urban team regarding utilization of certain assets in support of plan confirmation (1.0).	1.60	\$1,400.00
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08/11/25	SJM	Prepare for call with client leadership and Century Urban (.4); provide advice to client leadership and Century Urban team regarding utilization of certain assets in support of plan confirmation (.8).	1.20	\$1,050.00
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08/18/25	SJM	Review documents in preparation for Century Urban call (.6); provide advice to client leadership and Century Urban team regarding utilization of certain assets in support of plan confirmation (.7); follow-up call with A. Bardos (.3).	1.60	\$1,400.00
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08/21/25	SJM	Analyze email from Century Urban regarding next steps on real estate dispositions (.4); email to M. Lee regarding same (.2).	0.60	\$525.00
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08/25/25	SJM	Call with client regarding property sales and Century Urban employment (.3); provide advice to client leadership and Century Urban team regarding utilization of certain assets in support of plan confirmation (1.4).	1.70	\$1,487.50
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08/29/25	SJM	Call with B. Sparkman (Century Urban) regarding approach to employment resolution.	0.40	\$350.00
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Task Total:	7.10	\$6,212.50
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031 Insurance Issues (coverage, includes adversary proceeding)

08/01/25	ERR	Review court order regarding status conference.	0.40	\$440.00
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08/04/25	EPK	Email correspondence with A. Uetz and E. Ridley regarding letter received from Chubb relating to duty to defend tendered cases.	0.20	\$175.00
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ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 35

Foley & Lardner LLP

September 30, 2025

08/04/25	ERR	Review letter from Chubb regarding assignment of defense counsel regarding tendered claims and report to client.	0.50	\$550.00
08/04/25	MCM	Analyze coverage and reservation of rights letter from Chubb.	0.30	\$277.50
08/05/25	AMUE	Review of privileged insurance issues relating to discovery in the district court case.	1.40	\$1,470.00
08/05/25	EPK	Email correspondence with B. Neville of Murphy Pearson regarding RCWC litigation and insurance coverage issues (.1); separate emails with R. Manns of NRF regarding same (.1); confer with A. Uetz and E. Mazzocco regarding RCWC insurance issues and state court litigation in JCCP 5108 (.2).	0.40	\$350.00
08/05/25	EPM	Discussions regarding defense of state court actions.	0.60	\$504.00
08/05/25	ERR	Review communications from insurers regarding pending defense of cases subject to lift of stay.	0.80	\$880.00
08/05/25	JRBL	Review letter from Chubb (.2); analysis of coverage issues (.9); communications with E. Ridley regarding strategy to maximize coverage (.2).	1.30	\$1,787.50
08/06/25	EPM	Draft letters to insurers regarding defense of state court actions.	3.70	\$3,108.00
08/06/25	ERR	Review issues regarding independent counsel regarding defense of selected cases for relief from stay.	0.50	\$550.00
08/06/25	JRBL	Telephone conference with client regarding insurance issues and litigation and insurance strategy for cases released for trial.	1.20	\$1,650.00
08/06/25	MDL	Strategize with Foley team regarding insurer involvement in state court test cases.	0.10	\$87.50
08/08/25	EPM	Revise letters to insurers regarding defense for state court actions (1.2); discussion with S. Moses regarding updates in bankruptcy case (.3).	1.50	\$1,260.00
08/08/25	ERR	Edit letters to insurer regarding defense and cumis counsel.	1.40	\$1,540.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 36

Foley & Lardner LLP

September 30, 2025

08/08/25	ERR	Briefly review potential coverage issues regarding possible cases subject to relief from stay.	0.50	\$550.00
08/11/25	EPM	Analysis of insurance coverage for proposed state court cases.	7.40	\$6,216.00
08/11/25	ERR	Telephone conference with client regarding case status and issues regarding settlement from insurance review.	1.00	\$1,100.00
08/11/25	MDL	Analyze communications from Murphy Pearson attorneys regarding insurance policy coverage questions.	0.10	\$87.50
08/12/25	AMUE	Analyze privileged issue regarding insurer contributions in other settlements.	2.40	\$2,520.00
08/12/25	EPM	Privileged discussions regarding insurance coverage analysis for potential state court cases (.3); RCWC insurance coverage analysis (.6).	0.90	\$756.00
08/12/25	ERR	Review status of insurance issues related to plan and proposed stay lift.	0.50	\$550.00
08/13/25	EPK	Email correspondence with A. Ouellette, M. Lee, and E. Ridley regarding communications with insurance defense counsel appointed by Chubb.	0.20	\$175.00
08/13/25	EPM	Call with M. Roberts regarding insurance coverage analysis for state court cases and meet and confer preparation.	0.40	\$336.00
08/13/25	MR	Attend strategy call with E. Mazzocco regarding privileged matters related to discovery in insurance coverage action (.3); review relevant insurance policies to identify specific relevant provisions (.8).	1.10	\$874.50
08/14/25	AMUE	Finalize insurance assignment analysis (2.7) and communication with M. Kemner regarding same (.4).	3.10	\$3,255.00
08/14/25	EPM	Conduct meet and confer call with counsel for Westport (1.2); preparation for same (.4); privileged case strategy call with M. Lee and E. Ridley (1.0).	2.60	\$2,184.00
08/14/25	ERR	Review case status and strategy regarding plan and insurance contribution with client and Foley.	1.00	\$1,100.00
08/14/25	ERR	Review notices of appeal by insurers.	0.80	\$880.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 37

Foley & Lardner LLP

September 30, 2025

08/14/25	ERR	Review analysis of insurance potential recovery and apportionment.	0.50	\$550.00
08/14/25	MDL	Strategize with Foley team (E. Ridley, E. Mazzocco) regarding confidential mediation subject.	1.00	\$875.00
08/14/25	MR	Continue reviewing relevant insurance policies to identify specific relevant provisions (2.6); prepare for meet and confer call with counsel for Westport (.9); attend meet and confer call with counsel for Westport (1.1).	4.60	\$3,657.00
08/15/25	EPK	Email correspondence with A. Uetz regarding jurisdictional issues relating to insurance adversary proceeding (.2); preliminary research of jurisdiction and court authority issues (.4); analyze reasoning of Ninth Circuit cases on adversary proceeding jurisdiction issues (.5); email correspondence with E. Mazzocco and K. Farrar regarding insurance policies and tender letters to be sent to RCWC's state court counsel (.1).	1.20	\$1,050.00
08/15/25	EPM	Call with counsel for RCWC regarding insurance coverage (.4); call with Committee counsel regarding insurance coverage for state court cases (.3); prepare for calls (.4).	1.10	\$924.00
08/15/25	ERR	Review case status and upcoming conferences and issues regarding coverage of any case selected regarding stay relief.	1.00	\$1,100.00
08/15/25	ERR	Review analysis of policies regarding RCWC as "additional" insured (.6); call with counsel regarding same (.4).	1.00	\$1,100.00
08/15/25	KAFA	Identify insurance and tender letter productions and prepare for transmittal to RCWC counsel.	0.40	\$180.00
08/15/25	MDL	Evaluate data on other diocesan insurance settlements.	0.20	\$175.00
08/16/25	ERR	Review issues related to potential identified cases and insurance coverage related thereto.	0.40	\$440.00
08/17/25	ERR	Review issues related to any potential cases identified to court for lift of stay and analysis of insurance coverage.	0.80	\$880.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 38

Foley & Lardner LLP

September 30, 2025

08/18/25	EPM	Respond to inquiries from RCWC counsel regarding insurance coverage and tenders (.5); coordinate with litigation support regarding transmittal of documents to RCWC counsel (.6).	1.10	\$924.00
08/18/25	ERR	Telephone call with Z. Rutman (Chubb assigned counsel) regarding case status and selection.	0.50	\$550.00
08/18/25	ERR	Telephone conference with M. Kemner regarding case strategy vis a vis insurance coverage.	0.90	\$990.00
08/18/25	KAFA	Prepare insurance policies and tender letters for transmittal to RCWC counsel.	1.00	\$450.00
08/18/25	MDL	Revise letters to insurers regarding defense of six state court cases for which bankruptcy court lifted the automatic stay.	0.30	\$262.50
08/19/25	EPK	Review Ninth Circuit case law and adversary proceeding jurisdiction issues (.2); email correspondence with A. Uetz and the Foley restructuring team regarding summary of same (.2); review summary of recent insurance-related calls prepared by E. Mazzocco (.2).	0.60	\$525.00
08/19/25	EPM	Revise correspondence to insurers (.4); draft summary of recent calls with insurer counsel (.9); strategize with E. Ridley regarding preparation for case management conference (.5); prepare for call with E. Ridley (.5); review recent correspondence from Pacific entities (.3).	2.60	\$2,184.00
08/19/25	ERR	Review potential insurance allocation.	0.50	\$550.00
08/19/25	ERR	Review letters from insurers regarding pending discovery issues and productions.	1.00	\$1,100.00
08/19/25	ERR	Begin preparation for case management conference in insurance matter.	1.00	\$1,100.00
08/19/25	MDL	Strategize with E. Mazzocco and E. Ridley regarding independent monitoring attorney issue with respect to state court cases subject to lift stay order.	0.30	\$262.50
08/19/25	MDL	Strategize with E. Mazzocco and E. Ridley regarding case management conference and chapter 11 update at same.	0.40	\$350.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 39

Foley & Lardner LLP

September 30, 2025

08/19/25	MR	Analyze letter correspondence received from counsel for Pacific entities in insurance coverage action (.3); internal email strategy communications regarding document requests from insurer defendants in insurance coverage action (.3); create outline of key points for August 20, 2025 status conference in insurance coverage action (.6); review document production received from CIGA (.9).	2.10	\$1,669.50
08/20/25	EPM	Coordinate with J. Harrison regarding case management conference appearances (.2); review documents to be sent to RCWC counsel (1.0); call with E. Ridley, M. Lee, and S. Moses regarding case strategy and preparation for case management conference (.6); attend case management conference (.9).	2.70	\$2,268.00
08/20/25	ERR	Attend case management conference before Judge Corley.	1.00	\$1,100.00
08/20/25	ERR	Telephone call with client regarding case status and strategy.	1.00	\$1,100.00
08/20/25	ERR	Review acknowledgments of appeal in preparation for case management conference.	0.50	\$550.00
08/20/25	ERR	Review potential coordination of discovery issues per Court directives in insurance litigation.	0.50	\$550.00
08/20/25	ERR	Prepare for case management hearing.	0.50	\$550.00
08/20/25	JCH	Call to district court regarding request for parties to appear via Zoom for case management conference.	0.20	\$66.00
08/20/25	KAFA	Prepare client documents for transmittal to RCWC counsel.	0.90	\$405.00
08/20/25	MDL	Strategize with Foley team for presentation at district court case management conference.	0.60	\$525.00
08/20/25	MR	Complete drafting outline of key points for August 20, 2025 status conference in insurance coverage action.	1.20	\$954.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 40

Foley & Lardner LLP

September 30, 2025

08/20/25	SJM	Prepare for hearing in insurance coverage litigation to address bankruptcy issues (.4); call with E. Ridley and E. Mazzocco regarding same (.6); attend district court hearing (.6); follow-up call with E. Ridley and E. Mazzocco (.3).	1.90	\$1,662.50
08/21/25	ERR	Edit case management conference statement regarding underlying case.	0.80	\$880.00
08/21/25	ERR	Draft response to email from Z. Rutman.	0.50	\$550.00
08/21/25	ERR	Edit responsive email to Z. Rutman.	0.60	\$660.00
08/21/25	JCH	Calendar case management conference scheduled in new appeal cases.	0.20	\$66.00
08/21/25	SJM	Respond to E. Ridley regarding draft email to Chubb counsel.	0.20	\$175.00
08/22/25	EPM	Draft email to insurance carriers regarding selection of cases subject to lift stay order (.8); draft summary of insurance litigation status including recent correspondence with insurer and state court defense counsel (1.5).	2.30	\$1,932.00
08/22/25	ERR	Review letter from Chorley (Chubb) and respond to Z. Rutman email regarding representation.	1.00	\$1,100.00
08/22/25	ERR	Telephone call with J. Breall regarding pending discovery issues with insurers.	0.50	\$550.00
08/22/25	MR	Communicate with counsel for Pacific entity insurers regarding meet and confer call in relation to discovery matters in insurance coverage action (.1); internal email correspondence regarding privileged strategy matters in insurance coverage action (.4).	0.50	\$397.50
08/25/25	ERR	Review settlement proposal letter regarding insurance issues.	0.90	\$990.00
08/25/25	ERR	Review Pacific, etc. insurers' ex parte application to Alameda state court to intervene.	1.50	\$1,650.00
08/25/25	ERR	Analyze privileged insurance issue (1.3); draft communications regarding same (.7).	2.00	\$2,200.00
08/26/25	AMUE	Multiple email communications to insurers regarding settlement demand (1.1); analyze privileged issue regarding insurance settlement (1.6).	2.70	\$2,835.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 41

Foley & Lardner LLP

September 30, 2025

08/26/25	EPM	Review draft correspondence to insurers (.3); draft correspondence to Pacific entities' appointed counsel regarding association in state court cases (2.5).	2.80	\$2,352.00
08/26/25	ERR	Review letter submission to Court from Pacific regarding pending state claims and appeal briefing.	0.70	\$770.00
08/26/25	ERR	Edit communications to client (status update) and potential draft letters to insurers.	1.50	\$1,650.00
08/26/25	MDL	Final bankruptcy review of settlement communications to insurers.	0.10	\$87.50
08/26/25	MDL	Revise correspondence to insurers regarding final proposal to Committee.	0.10	\$87.50
08/26/25	MR	Internal email communications regarding privileged strategy matters in insurance coverage action.	0.30	\$238.50
08/27/25	EPK	Review case management conference letter to Judge Corley sent by appellants Pacific insurers (.2); email correspondence with E. Ridley and E. Mazzocco regarding same (.1).	0.30	\$262.50
08/27/25	EPM	Review Pacific entities letter to Judge Corley regarding a briefing schedule for appeal and request to stay lift stay order (.3); attend hearing on lift stay appeals (.3); call with E. Ridley and S. Moses regarding lift stay appeals hearing (.3).	0.90	\$756.00
08/27/25	ERR	Attend CMC regarding appeals before Judge Corley.	0.70	\$770.00
08/28/25	EPM	Preparation for privileged case strategy call (.2); privileged case strategy conference call with A. Uetz, M. Lee, E. Ridley, and client (1.0); call with M. Roberts regarding discovery status (.2); quality control review of potentially privileged documents (.4); telephone calls and emails with E. Ridley regarding draft correspondence to insurers (.4).	2.20	\$1,848.00
08/28/25	ERR	Meeting with client (A. Bardos and M. Kemner) and J. Breall regarding overall case strategy regarding insurance claims.	1.00	\$1,100.00
08/28/25	ERR	Review consolidation of appeals by insurer.	0.50	\$550.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 42

Foley & Lardner LLP

September 30, 2025

08/28/25	MR	Strategy call with E. Mazzocco regarding privileged discovery-related matters in insurance coverage action.	0.20	\$159.00
08/29/25	EPM	Internal discussions regarding case materials to send to J. Breall.	0.20	\$168.00
08/29/25	MR	Draft correspondence to counsel for Westport regarding discovery-related issues in follow-up to meet-and-confer call.	1.40	\$1,113.00
08/30/25	EPM	Privileged correspondence with J. Breall regarding case strategy.	0.20	\$168.00

Task Total: 98.60 \$92,858.00

032 Rule 2004 Motions/Discovery/Subpoenas

08/05/25	MDL	Analyze status of document collection for Committee supplemental discovery request.	0.10	\$87.50
08/08/25	KAFA	Review new client documents uploaded into Box.	0.20	\$90.00
08/08/25	MRL	Review email correspondence from M. Lee regarding reviewing certain documents.	0.20	\$135.00
08/12/25	KAFA	Review new client documents uploaded into Box.	0.30	\$135.00
08/27/25	MDL	Strategize regarding collection and review of additional documents requested by Committee in supplemental and diligence requests.	1.40	\$1,225.00
08/27/25	MRL	Confer with M. Lee regarding certain search terms to review documents (.1); confer with M. Thomas regarding finding specific search terms (.2); analyze specific search terms to review documents (.4); email correspondence with the Foley team regarding the search terms (.4).	1.10	\$742.50
08/28/25	MRL	Email correspondence with the Foley team regarding reviewing certain documents.	0.30	\$202.50

Task Total: 3.60 \$2,617.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 43

Foley & Lardner LLP

September 30, 2025

034 Other Motion Practice

08/01/25	EPK	Confer with S. Moses regarding finalization and filing of the fifth motion to extend removal deadline (.2); oversee and confirm filing of fifth extension motion (.1).	0.30	\$262.50
08/01/25	JCH	Revise motion to extend removal deadline to add table of contents and table of authorities (.2); finalize (.3) and file (.2) motion, A. Bardos declaration and notice of hearing; calendar hearing and response deadline regarding same (.2).	0.90	\$297.00
08/08/25	MWBE	Begin drafting motion papers regarding lease.	0.80	\$480.00
08/10/25	MWBE	Attention to memorandum of law, notice, affirmation in support of, proposed order, and stipulation for motion to extend lease assumption deadline.	0.90	\$540.00
08/12/25	MWBE	Follow up with S. Moses regarding memorandum of law, notice, affirmation in support of, proposed order, and stipulation for motion to extend lease assumption deadline.	0.10	\$60.00
08/19/25	MWBE	Discuss discovery assignment with S. Moses (.1); follow up with S. Moses regarding lease motion (.1).	0.20	\$120.00
08/24/25	MWBE	Further attention to motion papers to extend lease assumption deadline.	0.30	\$180.00
08/25/25	MWBE	Finish drafting motion papers for lease assumption deadline extension and share with S. Moses.	0.50	\$300.00
08/27/25	MWBE	Follow up with S. Moses regarding motion to extend lease assumption deadline (.1); discuss discovery-related assignment with S. Moses (.1).	0.20	\$120.00
08/27/25	SJM	Prepare for hearing on motion to extend time to remove state court actions (.5); attend hearing (.2).	0.70	\$612.50
08/28/25	MDL	Evaluate arguments in favor of Debtor's motion to dismiss.	0.60	\$525.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 44

Foley & Lardner LLP

September 30, 2025

08/28/25	MWBE	Follow up with S. Moses regarding responses and objections to discovery (.1); begin preparing same (.2).	0.30	\$180.00
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Task Total:	5.80	\$3,677.00
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035 General Counsel Matters

08/04/25	KAFA	Update MDRB Collaborate site per R. Medeiros' request.	0.20	\$90.00
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08/04/25	LFG	Review draft compliance report (.3) and confirm reporting requirements and outstanding data needs (.3).	0.60	\$720.00
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08/25/25	KAFA	Update MDRB Collaborate site per R. Medeiros' request (.9); communications with Father M. Richards to troubleshoot access to Collaborate (.3).	1.20	\$540.00
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08/25/25	LFG	Communications with client on administrative matters.	0.30	\$360.00
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Task Total:	2.30	\$1,710.00
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038 Mediation

08/01/25	MCM	Revise RCBO letter to Court regarding potential appointment of Judge Lafferty as mediator.	0.40	\$370.00
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08/01/25	MDL	Draft letter to Judge Lafferty regarding prospect of his serving as mediator.	0.50	\$437.50
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08/02/25	MCM	Email correspondence with Foley team regarding submission to Court on mediation issues.	0.30	\$277.50
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08/07/25	EPK	Review M. Lee's letter to the Court regarding proposed mediation with the insurers, Committee, and RCWC.	0.10	\$87.50
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08/15/25	ERR	Telephone call with T. Gallagher regarding status of settlement negotiations.	0.50	\$550.00
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08/15/25	MDL	Prepare for discussion with T. Gallagher regarding potential insurer settlements.	0.10	\$87.50
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ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 45

Foley & Lardner LLP

September 30, 2025

08/15/25	MDL	Telephone conference with T. Gallagher and Foley team (A. Uetz, E. Ridley) regarding potential insurer settlements.	0.50	\$437.50
08/15/25	MDL	Follow-up telephone conference with T. Gallagher regarding insurance settlement considerations.	0.10	\$87.50
08/15/25	MDL	Strategize regarding insurer settlement discussions in light of case conclusion options.	0.20	\$175.00
08/22/25	MDL	Telephone conference with T. Schiavoni and T. Gallagher regarding confidential mediation subject.	0.50	\$437.50
08/29/25	MDL	Strategize for negotiations with specific insurers.	0.30	\$262.50
Task Total:			3.50	\$3,210.00
Services Total:			473.80	\$413,853.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Angelica M. Lopez	AMPL	Associate	2.80	\$550.00	\$1,540.00
Evan L. Hamling	ELH	Associate	1.10	\$650.00	\$715.00
Gerald S. Kerska	GSK	Associate	4.30	\$800.00	\$3,440.00
Mason Roberts	MR	Associate	11.40	\$795.00	\$9,063.00
Mary Rofaail	MRL	Associate	25.90	\$675.00	\$17,482.50
Michael W. Berg	MWBE	Associate	6.80	\$600.00	\$4,080.00
Nora McGuffey	NMCG	Associate	0.40	\$700.00	\$280.00
Nicholas S. Covek	NSCO	Associate	11.80	\$575.00	\$6,785.00
Alissa M. Nann	AMN	Of Counsel	0.20	\$1,050.00	\$210.00
Shane J. Moses	SJM	Of Counsel	78.80	\$875.00	\$68,950.00
Janelle C. Harrison	JCH	Paralegal	18.00	\$330.00	\$5,940.00
Kerry A. Farrar	KAFA	Paralegal	5.10	\$450.00	\$2,295.00
Ann Marie Uetz	AMUE	Partner	74.10	\$1,050.00	\$77,805.00
Emil P. Khatchatourian	EPK	Partner	24.30	\$875.00	\$21,262.50
Eileen R. Ridley	ERR	Partner	35.30	\$1,100.00	\$38,830.00
Geoffrey S. Goodman	GSG	Partner	9.90	\$1,050.00	\$10,395.00
Jeff R. Blease	JRBL	Partner	3.70	\$1,375.00	\$5,087.50
Lisa F. Glahn	LFG	Partner	2.70	\$1,200.00	\$3,240.00
Mark C. Moore	MCM	Partner	15.30	\$925.00	\$14,152.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51154147

Page 46

Foley & Lardner LLP

September 30, 2025

Matthew D. Krueger	MDK	Partner	13.40	\$925.00	\$12,395.00
Matthew D. Lee	MDL	Partner	61.40	\$875.00	\$53,725.00
Thomas F. Carlucci	TFCA	Partner	1.70	\$1,375.00	\$2,337.50
Alan R. Ouellette	AROU	Senior Counsel	2.60	\$875.00	\$2,275.00
Elizabeth P. Mazzocco	EPM	Senior Counsel	33.20	\$840.00	\$27,888.00
Tamar N. Dolcourt	TND	Special Counsel	29.60	\$800.00	\$23,680.00
Totals			473.80		\$413,853.50

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$186.70
LSS - eDiscovery Services	\$12,400.00
Service Fees	\$80.00
Expenses Incurred Total	\$12,666.70

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

Expense Detail

Electronic Legal Research Services

Date	Initials	Description	Amount
08/31/25	MR	DOCKET REPORT. Westlaw.	\$186.70

LSS - eDiscovery Services

Date	Initials	Description	Amount
08/31/25	JRBL	LSS - eDiscovery Services.	\$12,400.00

Service Fees

Date	Initials	Description	Amount
07/01/25	JRBL	CASE ANYWHERE, LLC - System Access Fee - 07/01/25.	\$40.00
08/04/25	JRBL	CASE ANYWHERE, LLC - System Access Fees - 08/04/25.	\$40.00
			<u>\$80.00</u>

Expense Total:	<u>\$12,666.70</u>
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