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Counsel for the Official Committee of Unsecured Creditors

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

In re:

Case No. 23-40523 WJL

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

Chapter 11

Debtor.

**COVER SHEET TO SIXTH INTERIM FEE
APPLICATION OF BURNS BAIR LLP AS
SPECIAL INSURANCE COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF MAY 1, 2025 THROUGH
AUGUST 31, 2025**

Judge: Hon. William J. Lafferty

Date: December 3, 2025

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

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

Objection Deadline: November 5, 2025



1	Name of Applicant:	Burns Bair LLP
2	Name of Client:	The Official Committee of Unsecured Creditors of the Roman Catholic Bishop of Oakland
3	Time period covered by this application:	May 1, 2025 through August 31, 2025
4	Total compensation sought this period:	\$193,962.00 ¹
5	Total expenses sought this period:	\$1,618.72
6	Petition date:	May 8, 2023
7	Retention date:	July 14, 2023
8	Date of Order approving employment:	August 16, 2023
9	Total compensation approved by interim order to date:	\$1,908,311.20
10	Total expenses approved by interim order to date:	\$68,672.68
11	Total compensation paid by interim order to date:	\$1,846,186.20
12	Total expenses paid by interim order to date:	\$68,672.68
13	Blended rate in the Interim Application for all attorneys:	\$868.76
14	Blended rate in the Interim Application for all timekeepers:	\$850.01
15	Fees sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$58,261.00
16	Expenses sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$0
17	If applicable, number of professionals in this application not included in staffing plan approved by client	N/A
18	If applicable, difference between fees budgeted and compensation sought for this period:	N/A
19	Number of professionals included in this application:	7
20	Number of professionals billing fewer than 15 hours to the case during this period:	4
21	Are any rates higher than those approved or disclosed at retention?	No
22	Interim or Final:	Interim

¹ This includes the approved but not yet paid holdback fees of \$62,125.00 from the Fifth Interim Fee Application (the "Fifth Holdback"). By agreement between the Debtor and the Committee, Burns Bair, along with other estate professionals, was not paid the Fifth Holdback after the approval of the Fifth Interim Fee Application but is allowed to request its payment at this time.

SUMMARY OF MONTHLY FEE STATEMENTS

Date Filed & Docket	Period Covered	Total Compensation and Expenses Incurred		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date	
		Fees	Expenses	Fees (70%)	Expenses (100%)	Fees (70%)	Expenses (100%)
6/30/2025 [Dkt. 2103]	5/1/2025 – 5/31/2025	\$17,313.00	\$0	\$12,119.10	\$0	\$12,119.10	\$0
7/30/25 [Dkt. 2171]	6/1/2025- 6/30/2025	\$14,587.00	\$0	\$10,210.90	\$	\$10,210.90	\$0
8/29/25 [Dkt. 2263]	7/1/2025 - 7/31/2025	\$51,330.00	\$0	\$35,931.00	\$0	\$35,931.00	\$0
9/30/25 [Dkt. 2348]	8/1/2025 - 8/31/2025	\$48,607.00	\$1,618.72	\$34,024.90	\$1,618.72	\$0	\$0
Total:		\$131,837.00	\$1,618.72	\$92,285.90	\$1,618.72	\$58,261.00	\$0.00

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Fee Application Not Yet Paid: \$75,194.72²

² This amount does not include the approved but not yet paid Fifth Holdback of \$62,125.00.

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Counsel for the Official Committee of Unsecured Creditors

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

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

**SIXTH INTERIM FEE APPLICATION OF
BURNS BAIR LLP AS SPECIAL
INSURANCE COUNSEL TO THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR
ALLOWANCE AND PAYMENT OF FEES
AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM MAY 1, 2025
THROUGH AUGUST 31, 2025**

Judge: Hon. William J. Lafferty

Date: December 3, 2025

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

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

Objection Deadline: November 5, 2025

1 Burns Bair LLP (the “**Applicant**” or “**Burns Bair**”), special insurance counsel to the
2 Official Committee of Unsecured Creditors (the “**Committee**”) of the Roman Catholic Bishop
3 of Oakland (the “**Debtor**”) in the above captioned chapter 11 case (the “**Chapter 11 Case**”)
4 hereby submits its Sixth Interim Fee Application (the “**Interim Application**”), for an order, in
5 substantially the form attached hereto as **Exhibit A**, pursuant to sections 330 and 331 of title 11
6 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of
7 Bankruptcy Procedure (the “**Bankruptcy Rules**”), the United States Trustee Appendix B
8 Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed
9 Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013
10 (the “**U.S. Trustee Guidelines**”), the *Guidelines for Compensation and Expense Reimbursement*
11 *of Professionals and Trustees* (the “**Northern District Guidelines**”), and the Local Bankruptcy
12 Rules for the Northern District of California (the “**Local Rules**”), and the *Order Authorizing*
13 *Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the
14 “**Interim Compensation Order**”) [Dkt. No. 170] entered by the Court on June 23, 2023, for
15 interim approval and allowance of (i) compensation for professional services rendered to the
16 Committee from May 1, 2025 through and including August 31, 2025 (the “**Interim Fee**
17 **Period**”) and (ii) reimbursement of expenses incurred in connection with such services; and, in
18 support thereof, respectfully represents as follows:

19 **PRELIMINARY STATEMENT**

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

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

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

JURISDICTION

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

CASE BACKGROUND AND STATUS

A. Debtor's Bankruptcy Proceedings

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

B. Selection of the Committee

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

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

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

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

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

25 8. By this Interim Application, the Applicant seeks interim allowance of
26 compensation in the amount of **\$131,837.00** and actual and necessary expenses in the amount of
27 **\$1,618.72** for a total allowance of **\$133,455.72** for the Interim Fee Period.

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

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

3 10. There is no agreement or understanding between Burns Bair and any other person
4 other than the partners of Burns Bair for the sharing of compensation to be received for services
5 rendered in this Chapter 11 Case. In connection with the Chapter 11 Case, as of this date Burns
6 Bair has been paid **\$58,261.00** in fees and **\$0** in expenses.

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

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

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

28 13. During the Interim Fee Period, Burns Bair professionals expended 155.10 hours

on behalf of the Committee. Of this, 98.30 hours were expended by Burns Bair partners, 51.30 hours by Burns Bair associates, and 5.50 hours by paraprofessionals. In accordance with the Interim Compensation Order, the Northern District Guidelines, the U.S. Trustee Guidelines, and the Local Rules, Burns Bair has classified services performed into four specific categories set forth below. Burns Bair has attempted to place the services provided in the category that best relates to such services; because certain services may relate to one or more categories, however, services pertaining to one category may in fact be included in another category. The following summary of services rendered during the Interim Fee Period is not intended to be a detailed description of the work performed. Rather, it merely highlights certain project billing categories in which significant services were rendered by Burns Bair, as well as identifies some of the issues Burns Bair was required to address.

A. Committee Meetings Fees: \$10,458.00; Total Hours: 10.30

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

B. Fee Applications Fees: \$5,794.00; Total Hours: 10.00

15. During the Interim Fee Period, Burns Bair prepared four monthly fee statements for the periods April 1, 2025 through April 30, 2025 [Dkt No. 2018], May 1, 2025 through May 31, 2025 [Dkt. No. 2103], June 1, 2025 through June 30, 2025 [Dkt. No. 2171], and July 1, 2025 through July 31, 2025 [Dkt. No. 2263]. Burns Bair also prepared its Fifth Interim Fee Application [Dkt. 2074].

C. Hearings Fees: \$12,947.00; Total Hours: 15.10

16. During the Interim Fee Period, Burns Bair attorneys appeared before the Court as special insurance counsel to the Committee at various hearings in both the Insurance Adversary Proceedings and the main Chapter 11 Case concerning case insurance issues, including, without limitation, the Committee's renewed motion to lift stay, the insurers' lift stay appeals, and case status conferences.

1 **D. Insurance Recovery Activities Fees: \$102,638.00; Total Hours: 119.70**

2 17. In addition to the above described tasks, during the Interim Fee Period, Burns
3 Bair expended a considerable number of hours on behalf of the Committee performing additional
4 insurance recovery activities including, but not limited to, fact and expert work in connection
5 with Plan litigation insurance issues; drafting insurance objections to the Debtor's Plan; analysis
6 of and responding to insurance-related Plan discovery; drafting insurance portions of the
7 Committee's renewed motion to lift the stay and reply in support of same; drafting the
8 Committee's section of the joint status report in the insurance adversary proceeding; legal
9 research and analysis in connection with potential Plan structures, continued negotiations, and
10 ongoing case insurance issues; drafting insurance portions of strategy presentations to the
11 Committee and state court counsel; and continuing to develop overall insurance strategy for the
12 Committee.

13 **ACTUAL AND NECESSARY DISBURSEMENTS**

14 18. During the Interim Fee Period, Burns Bair incurred a total of **\$1,618.72** in
15 expenses. These expenses relate primarily to travel in connection with a court hearing. These
16 expenses are reasonable and necessary for the administration of the Chapter 11 Case.

17 **LEGAL BASIS FOR INTERIM COMPENSATION**

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

23 20. In accordance with the factors enumerated in section 330 of the Bankruptcy Code,
24 Burns Bair respectfully submits that the amount requested by Burns Bair is fair and reasonable
25 given the complexity of the Chapter 11 Case, the time expended, the nature and extent of the
26 services rendered, the value of such services, and the costs of comparable services other than in
27 a case under the Bankruptcy Code. Moreover, Burns Bair has reviewed the requirements of the
28 Interim Compensation Order, the Northern District Guidelines, and the UST Guidelines and

believes that the Interim Application complies with all of them.

COMPLIANCE WITH LARGE CASE REQUIREMENTS

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

Exhibit B: Customary and Comparable Compensation Disclosures with Fee Applications

Exhibit C: Budget and Staffing Plan

Exhibit D: Summary of Timekeepers in this Application

Exhibit E: Summary of Compensation by Project Category

Exhibit F: Summary of Expense Reimbursement

Exhibit G: Detailed records for the Compensation Period

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

Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A. The fees sought in this fee application do not exceed the fees budgeted for the time period covered.
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No.
Does this fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application). If so, please quantify by hours and fees.	No. Any time worked on these tasks would have been in connection with preparing monthly fee statements.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	No.

If the fee application includes any rate increases since retention:
i. Did your client review and approve those rate increases in advance?
ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

N/A

AVAILABLE FUNDS

23. The Applicant understands that the Debtor's estate has sufficient funds available to pay the fees and costs sought herein.

NOTICE

Notice of the Interim Application has been provided to parties in interest in accordance with the procedures set forth in the Interim Compensation Order. Burns Bair submits that, in view of the facts and circumstances of the Chapter 11 Case, such notice is sufficient, and no other or further notice need be provided.

CONCLUSION

Burns Bair respectfully requests an interim allowance to Burns Bair as compensation for fees in the amount of **\$131,837.00** and actual and necessary expenses in the amount of **\$1,618.72** for a total allowance of **\$133,455.72**; for payment of the approved but not yet paid holdback fees from the Fifth Interim Fee Application of **\$62,125.00**; and for such other and further relief as this Court deems proper.

Date: October 15, 2025

Respectfully submitted,

BURNS BAIR LLP

By: Jesse J. Bair
Jesse J. Bair

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

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Exhibit A

LOWENSTEIN SANDLER LLP

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Counsel for the Official Committee of Unsecured Creditors

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

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

**[PROPOSED] ORDER GRANTING SIXTH
INTERIM FEE APPLICATION OF BURNS
BAIR LLP AS SPECIAL INSURANCE
COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ALLOWANCE AND
PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD OF MAY 1, 2025 THROUGH
AUGUST 31, 2025**

Judge: Hon. William J. Lafferty

Date: December 3, 2025

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

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

Objection Deadline: November 5, 2025

1 Upon consideration of the *Sixth Interim Fee Application of Burns Bair LLP as Special*
2 *Insurance Counsel to the Official Committee of Unsecured Creditors for Allowance and Payment*
3 *of Compensation and Reimbursement of Expenses for the Period of May 1, 2025 through August*
4 *31, 2025* (the “**Interim Application**”);¹ and this Court having jurisdiction to consider the Interim
5 Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, the *Order*
6 *Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal)
7 and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the
8 Northern District of California; and consideration of the Interim Application and the requested
9 relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this
10 Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Interim
11 Application having been provided to the parties listed therein, and it appearing that no other or
12 further notice need be provided; and this Court having reviewed the Interim Application of Burns
13 Bair; and, upon the record and all of the proceedings had before the Court; and this Court having
14 found and determined that the relief sought in the Interim Application is in the best interests of
15 the Debtor, its estate, creditors, and all parties in interest; and that the legal and factual bases set
16 forth in the Interim Application establish just cause for the relief granted herein; and after due
17 deliberation and sufficient cause appearing therefor,

18 **IT IS HEREBY ORDERED THAT:**

- 19 1. The Interim Application is granted as provided herein.
- 20 2. Burns Bair is awarded an interim allowance of its compensation for professional
21 services rendered in the amount of **\$133,455.72** consisting of **\$131,837.00** of fees and
22 reimbursement of **\$1,618.72** of actual and necessary expenses incurred during the Interim Fee
23 Period; and for payment of the approved but not yet paid holdback fees from the Fifth Interim
24 Fee Application of **\$62,125.00**.
- 25 3. The Debtor is directed to pay Burns Bair the amount allowed in paragraph 2 above.
- 26
- 27

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

1 4. The Court shall retain jurisdiction to determine any controversy arising in
2 connection with this Order.

3 ** END OF ORDER **
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EXHIBIT B
CUSTOMARY AND COMPARABLE DISCLOSURES WITH FEE APPLICATIONS

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

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

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

Category of Timekeeper	Blended Hourly Rate	
	BILLED ¹ Firm for proceeding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner	\$977.79	\$1,038.54
Associate	\$513.45	\$543.45
Paralegal	\$374.81	\$340.00
All Timekeepers Aggregated	\$622.67	\$850.01

Case Name: Roman Catholic Bishop of Oakland
Case Number: 23-BK-40523
Applicant's Name: Burns Bair LLP
Date of Application: October 15, 2025
Interim or Final: Interim

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

EXHIBIT C

PROPOSED SIXTH INTERIM BUDGET FOR SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE ROMAN CATHOLIC BISHOP OF OAKLAND FOR THE PERIOD MAY 1, 2025 THROUGH AUGUST 31, 2025

Project Category	Estimated Hours		Estimated Fees ¹	
	Low	High	Low	High
Meetings of and Communication with Creditors	20	40	\$13,360.00	\$26,720.00
Fee Applications	10	15	\$6,680.00	\$10,020.00
Hearings	40	60	\$26,720.00	\$40,080.00
Mediation	10	35	\$6,680.00	\$23,380.00
Plan and Disclosure Statement	30	60	\$20,040.00	\$40,080.00
Other Insurance Recovery Activities, including Adversary Proceedings and Bankruptcy Litigation	35	85	\$23,380.00	\$56,780.00
TOTAL	145	295	\$96,860.00	\$197,060.00

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

STAFFING PLAN FOR SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE ROMAN CATHOLIC BISHOP OF OAKLAND FOR THE PERIOD MAY 1, 2025 THROUGH AUGUST 31, 2025

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

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

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

EXHIBIT D

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

NAME OF PROFESSIONAL:	POSITION	YEAR ADMITTED	HOURLY RATE	TOTAL HOURS	TOAL FEES
Timothy W. Burns	Partner	1991	\$1,120.00	61.90	\$69,328.00
Jesse J. Bair	Partner	2013	\$900.00	36.40	\$32,760.00
Nathan M. Kuenzi	Associate	2020	\$550.00	46.00	\$25,300.00
Brian P. Cawley	Associate	2020	\$550.00	1.10	\$605.00
Alexander R. Castro	Associate	2024	\$470.00	4.20	\$1,974.00
Brenda Horn-Edwards	Paralegal	N/A	\$340.00	4.50	\$1,530.00
Karen Dempksi	Paralegal	N/A	\$340.00	1.00	\$340.00
Total:				155.10	\$131,837.00

EXHIBIT E
SUMMARY OF COMPENSATION REQUESTED BY CATEGORY

Category	Hours Billed this Fee Period	Total for Fee Statement
Committee Meetings	10.30	\$10,458.00
Fee Applications	10.00	\$5,794.00
Hearings	15.10	\$12,947.00
Insurance Recovery Activities	119.70	\$102,638.00
Total:	155.10	\$131,837.00

EXHIBIT F
SUMMARY OF EXPENSE REIMBURSEMENT

Expense Category	Total Expenses
Travel – Flights	\$735.78
Travel – Hotels	\$804.00
Travel – Meals	\$58.94
Travel – Mileage, Tolls, Parking, Taxi/Uber	\$20.00
TOTAL:	\$1,618.72

Exhibit G

Burns | Bair

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Madison, Wisconsin 53703-3392
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www.BurnsBair.com

The Roman Catholic Bishop of Oakland UCC

Issue Date : 6/26/2025

Bill # : 01963

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/15/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments and next-steps (.6);	0.60	\$540.00
5/16/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, strategy, and next-steps (1.1);	1.10	\$990.00
Totals for Committee Meetings			1.70	\$1,530.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/5/2025	Jesse Bair	Review and edit proposed order granting interim fee applications (.1);	0.10	\$90.00
5/9/2025	Jesse Bair	Review Order granting interim fee applications (.1);	0.10	\$90.00
5/29/2025	Jesse Bair	Review and edit monthly fee statement (.1); correspond with KBK team re same (.1);	0.20	\$180.00
5/29/2025	Brenda Horn-Edwards	Draft monthly professional fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
5/30/2025	Jesse Bair	Review the debtor's reply in support of motion to amend compensation order (.1);	0.10	\$90.00
Totals for Fee Applications			0.80	\$552.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/13/2025	Nathan Kuenzi	Participate in hearing on discovery issues for insurance purposes (2.2);	2.20	\$1,210.00
Totals for Hearings			2.20	\$1,210.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/1/2025	Timothy Burns	Review restricted asset adversary complaint and related correspondence from Lowenstein to the Committee (.2);	0.20	\$224.00
5/3/2025	Jesse Bair	Review the debtor's disclosure of fact witnesses and related correspondence with Committee professionals and state court counsel re same (.2);	0.20	\$180.00
5/5/2025	Nathan Kuenzi	Participate in conference with BB team re case status and insurance discovery (.2);	0.20	\$110.00
5/5/2025	Timothy Burns	Conference with BB internal team re insurance discovery issues (.2);	0.20	\$224.00
5/5/2025	Timothy Burns	Review correspondence with Committee professionals re Diocese's witness list (.1);	0.10	\$112.00
5/5/2025	Jesse Bair	Analyze the debtor's fact witness disclosures for insurance purposes (.2); review and respond to correspondence with Lowenstein re same and related insurance confirmation schedule (.2); participate in call with M. Kaplan re same (.2);	0.60	\$540.00
5/5/2025	Jesse Bair	Analysis re insurance 30(b)(6) testimony at trial (.2);	0.20	\$180.00
5/5/2025	Jesse Bair	Participate in BB team conference re insurance discovery issues and potential depositions (.2);	0.20	\$180.00
5/5/2025	Nathan Kuenzi	Research potential expert qualifications and academic history (1.0);	1.00	\$550.00
5/6/2025	Nathan Kuenzi	Review schedule with respect to insurance issues and confirmation in light of expert/rebuttal expert issues (.4);	0.40	\$220.00
5/7/2025	Nathan Kuenzi	Review potential expert materials circulated by B. Weisenberg (.6);	0.60	\$330.00
5/7/2025	Jesse Bair	Review B. Wiesenberg correspondence re preliminary vote results and other case developments (.1);	0.10	\$90.00
5/7/2025	Timothy Burns	Review B. Weisenberg correspondence re plan voting (.1);	0.10	\$112.00
5/7/2025	Timothy Burns	Review Bond Obligated Group Adversary Complaint and related correspondence with Lowenstein (.2);	0.20	\$224.00
5/8/2025	Jesse Bair	Review and edit Committee insurance expert application motion and accompanying materials (.3);	0.30	\$270.00
5/9/2025	Timothy Burns	Review the Committee's subpoenas/notices to RCBO related entities (.2); review the Committee's corporate representative deposition notice to RCBO and individual notices (.2);	0.40	\$448.00

5/9/2025	Timothy Burns	Review insurance expert retention application (.2);	0.20	\$224.00
5/9/2025	Timothy Burns	Review correspondence with B. Weisenberg, the Committee, and state court counsel re confirmation experts (.2);	0.20	\$224.00
5/9/2025	Jesse Bair	Review and respond to correspondence with Lowenstein re insurance expert retention issues (.4);	0.40	\$360.00
5/12/2025	Timothy Burns	Review Hogan deposition notice (.1);	0.10	\$112.00
5/12/2025	Timothy Burns	Review Debtor's Objection and reservation of rights to the Committee's Motion for Protective Order (.2);	0.20	\$224.00
5/12/2025	Timothy Burns	Review the Committee's Objection to Joint Motion to Quash (.2); review correspondence with B. Weisenberg and state court counsel re recent discovery motion filings and hearing on same (.1);	0.30	\$336.00
5/13/2025	Nathan Kuenzi	Draft email memo summarizing outcome and key takeaways from discovery hearing (.2);	0.20	\$110.00
5/13/2025	Timothy Burns	Review N. Kuenzi's summary of discovery hearing (.1); conference with BB team re same (.2);	0.30	\$336.00
5/13/2025	Nathan Kuenzi	Participate in conference with BB team re outcome of discovery hearing and next-steps (.2);	0.20	\$110.00
5/13/2025	Jesse Bair	Review N. Kuenzi summary re outcome of discovery hearing (.1); participate in conference with BB team re same and case next-steps (.2);	0.30	\$270.00
5/14/2025	Timothy Burns	Participate in conference with J. Bair re discovery issues confirmation next-steps (.2);	0.20	\$224.00
5/14/2025	Jesse Bair	Review B. Wiesenberg correspondence re debtor objections to Committee expert retentions and related briefing re same (.1);	0.10	\$90.00
5/14/2025	Jesse Bair	Review B. Wiesenberg correspondence re various case developments (.1);	0.10	\$90.00
5/14/2025	Jesse Bair	Participate in conference with T. Burns re discovery issues confirmation next-steps (.2);	0.20	\$180.00
5/15/2025	Jesse Bair	Analysis re potential resolution of debtor objections to Committee expert retentions (.2); participate in call with Committee professionals re same and overall Committee expert strategy (.3);	0.50	\$450.00
5/15/2025	Jesse Bair	Participate in second call with Committee professionals re expert strategy and confirmation insurance discovery issues (.3);	0.30	\$270.00

5/15/2025	Timothy Burns	Prepare for conference with Committee professionals re insurance expert issues (.2); participate in call with Committee professionals re same (.3); participate in additional call with Committee professionals re same and confirmation strategy (.3);	0.80	\$896.00
5/21/2025	Jesse Bair	Review the debtor's expert witness disclosures (.1);	0.10	\$90.00
5/21/2025	Nathan Kuenzi	Analyze RCBO fact/expert witness disclosures with emphasis on insurance issues/background of experts identified (.6);	0.60	\$330.00
5/22/2025	Nathan Kuenzi	Outline insurance-related sections of Plan objection (1.4);	1.40	\$770.00
5/22/2025	Jesse Bair	Prepare for call with Lowenstein re insurance confirmation objections (.2); participate in call with Lowenstein re same (.3); draft brief outline of insurance objections (.2);	0.70	\$630.00
5/22/2025	Nathan Kuenzi	Participate in call with Committee professionals re insurance-related Plan objections (.3);	0.30	\$165.00
5/23/2025	Nathan Kuenzi	Continue outlining insurance-related sections of Plan objection (.4);	0.40	\$220.00
5/23/2025	Timothy Burns	Review correspondence with Lowenstein and Debtor re unknown abuse claims representative discovery (.1);	0.10	\$112.00
5/23/2025	Timothy Burns	Review RCBO voting results (.1); review and respond to B. Weisenberg correspondence re same (.1);	0.20	\$224.00
5/23/2025	Timothy Burns	Review and respond to RCBO's identification of witnesses and related correspondence with B. Weisenberg (.2);	0.20	\$224.00
5/23/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re insurance issues in connection with the debtor's fact witness and expert disclosures (.2);	0.20	\$180.00
5/23/2025	Jesse Bair	Review preliminary voting summary and related correspondence with B. Wiesenberg and state court counsel re same (.1);	0.10	\$90.00
5/27/2025	Karen Dempksi	Download/upload Hogan and Committee production documents (.2);	0.20	\$68.00
5/27/2025	Nathan Kuenzi	Analyze recent document productions from the Committee and debtor (.4);	0.40	\$220.00
5/27/2025	Timothy Burns	Review the Committee's amended discovery responses (.4);	0.40	\$448.00
5/27/2025	Timothy Burns	Review correspondence re confirmation depositions (.1);	0.10	\$112.00
5/27/2025	Jesse Bair	Review the Committee's amended responses and objections to the debtor's discovery requests (.2); review the Committee's 30(b)(6) deposition notice (.1);	0.30	\$270.00

5/27/2025 Timothy Burns	Review the Committee's deposition notices (.1);	0.10	\$112.00
5/27/2025 Timothy Burns	Review Lowenstein correspondence re recent motions filed by Debtor (.1); review motion to dismiss restricted assets complaint (.1); review motion to dismiss the Committee's first amended adversary complaint (.2);	0.40	\$448.00
5/27/2025 Timothy Burns	Review Lowenstein correspondence re motions to dismiss substantive consolidation amended complaint (.1); review debtor's motion to dismiss substantive consolidation amended complaint (.1); review RCC RCWC motion to dismiss same (.2);	0.40	\$448.00
5/28/2025 Jesse Bair	Review potential insurance strategy re ongoing confirmation issues (.1);	0.10	\$90.00
5/29/2025 Jesse Bair	Review correspondence with the debtor, insurers, and Committee professionals re case discovery issues (.1);	0.10	\$90.00
5/29/2025 Jesse Bair	Participate in call with state court counsel re Plan issues and case insurance strategy (.2);	0.20	\$180.00
Totals for Insurance Recovery Activities		16.60	\$14,021.00
Total Hours and Fees		21.30	\$17,313.00

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Jesse Bair	Partner	7.50	\$900.00	\$6,750.00
Karen Dempski	Paralegal	0.20	\$340.00	\$68.00
Nathan Kuenzi	Associate	7.90	\$550.00	\$4,345.00
Timothy Burns	Partner	5.40	\$1,120.00	\$6,048.00

Total Due This Invoice: \$17,313.00

Burns | Bair

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The Roman Catholic Bishop of Oakland UCC

Issue Date : 7/28/2025

Bill # : 01985

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/12/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, strategy, and next-steps (.6);	0.60	\$540.00
6/13/2025	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re case developments, strategy, and next-steps (1.0);	1.00	\$900.00
Totals for Committee Meetings			1.60	\$1,440.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/6/2025	Brenda Horn-Edwards	Draft exhibits to Burns Bair fifth interim fee application (1.0);	1.00	\$340.00
6/6/2025	Brenda Horn-Edwards	Draft declaration of S. Woodall in support of Burns Bair fifth interim fee application (.1);	0.10	\$34.00
6/6/2025	Brenda Horn-Edwards	Draft declaration of J. Bair in support of Burns Bair fifth interim fee application (.2); draft Exhibit A to same (.1); correspond with J. Bair (.1);	0.40	\$136.00
6/6/2025	Brenda Horn-Edwards	Draft Burns Bair fifth interim fee application (1.6);	1.60	\$544.00
6/11/2025	Jesse Bair	Review and edit Burns Bair's interim fee application and accompanying exhibits (1.2); correspond with KBK re same (.1);	1.30	\$1,170.00
6/16/2025	Karen Dempksi	Docket/calendar interim fee application hearing (.1);	0.10	\$34.00
6/17/2025	Jesse Bair	Correspond with G. Albert re budget estimate requested by debtor (.1);	0.10	\$90.00
6/17/2025	Jesse Bair	Review notice of hearing re interim fee applications (1);	0.10	\$90.00

6/26/2025	Jesse Bair	Review and edit Burns Bair monthly fee statement (.2); correspond with KBK and B. Horn-Edwards re same (.1);	0.20	\$180.00
6/26/2025	Brenda Horn-Edwards	Draft monthly professional fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
6/30/2025	Brenda Horn-Edwards	Edit Burns Bair monthly fee application (.1); correspond with J. Bair re same (.1);	0.20	\$68.00
6/30/2025	Jesse Bair	Review and edit revised monthly fee statement (.1); correspond with KBK and B. Horn-Edwards re same (.1);	0.20	\$180.00
Totals for Fee Applications			5.60	\$2,968.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/2/2025	Timothy Burns	Review B. Weisenberg correspondence with the Committee and state court counsel re plan voting results (.1);	0.10	\$112.00
6/2/2025	Jesse Bair	Review correspondence with B. Wiesenberg and the Committee re case developments and vote outcome (.1);	0.10	\$90.00
6/5/2025	Timothy Burns	Participate in call with state court counsel re insurance Plan issues (.1);	0.10	\$112.00
6/5/2025	Jesse Bair	Review and respond to B. Wiesenberg questions re debtor expert Martin (.2);	0.20	\$180.00
6/6/2025	Jesse Bair	Review Plan vote tabulation (.1);	0.10	\$90.00
6/6/2025	Timothy Burns	Review correspondence with Committee professionals re Diocesan potential expert (.2);	0.20	\$224.00
6/9/2025	Timothy Burns	Review the Committee's Memo of Law re 30(b)(6) deposition issues (.2);	0.20	\$224.00
6/9/2025	Jesse Bair	Review the debtor and Committee's Rule 30(b)(6) briefs (.2);	0.20	\$180.00
6/10/2025	Nathan Kuenzi	Continue outlining insurance arguments in opposition to Plan confirmation (2.3);	2.30	\$1,265.00
6/10/2025	Timothy Burns	Participate in call with B. Weisenberg re case strategy (.6);	0.60	\$672.00
6/10/2025	Jesse Bair	Review BB correspondence re case updates and insurance strategy (.1);	0.10	\$90.00
6/11/2025	Karen Dempksi	Docket/calendar updated confirmation dates (.1);	0.10	\$34.00
6/11/2025	Timothy Burns	Review and respond to revised confirmation scheduling dates (.2);	0.20	\$224.00
6/12/2025	Timothy Burns	Review and revise draft renewed motion to lift the stay (1.5);	1.50	\$1,680.00
6/12/2025	Jesse Bair	Review amended confirmation schedule (.1);	0.10	\$90.00
6/12/2025	Jesse Bair	Review and edit the Committee's renewed motion to lift the stay (.4);	0.40	\$360.00

6/13/2025 Timothy Burns	Review correspondence with Committee professionals and state court counsel re suggested edits to draft renewed motion to lift the stay (.2);	0.20	\$224.00
6/14/2025 Timothy Burns	Review and respond to B. Weisenberg correspondence re 6/13 hearing outcome (.2);	0.20	\$224.00
6/15/2025 Jesse Bair	Review B. Wiesenberg summary re outcome of recent hearing re case discovery and adversary proceeding issues (.1);	0.10	\$90.00
6/18/2025 Jesse Bair	Review and edit revised version of the Committee's renewed motion to lift the stay (.3); review and respond to various correspondence with Committee professionals and state court counsel re same and additional potential edits (.3);	0.60	\$540.00
6/18/2025 Timothy Burns	Review and edit revised version of renewed motion to lift the stay (1.4);	1.40	\$1,568.00
6/18/2025 Timothy Burns	Review and respond to various correspondence with Committee professionals re additional potential edits to the renewed motion to lift the stay (.4);	0.40	\$448.00
6/18/2025 Timothy Burns	Review and respond to correspondence with state court counsel re renewed motion to lift the stay and potential revisions to same (.4);	0.40	\$448.00
6/19/2025 Jesse Bair	Review correspondence with B. Wiesenberg and the Committee re the Committee's renewed motion to lift stay (.1);	0.10	\$90.00
6/20/2025 Jesse Bair	Review correspondence with state court counsel re lift stay issues (.1);	0.10	\$90.00
6/26/2025 Jesse Bair	Review B. Weisenberg correspondence re various case developments and next-steps (.1); review correspondence with Committee professionals and state court counsel re lift stay motion and related issues (.1);	0.20	\$180.00
6/26/2025 Timothy Burns	Review correspondence with state court counsel re insurance strategy (.2); participate in call with B. Weisenberg re same (.1); participate in call with state court counsel re same (.2);	0.50	\$560.00
6/30/2025 Jesse Bair	Review BB correspondence re mediation developments (.1);	0.10	\$90.00
Totals for Insurance Recovery Activities		10.80	\$10,179.00
Total Hours and Fees		18.00	\$14,587.00

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	3.60	\$340.00	\$1,224.00

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jesse Bair	Partner	5.90	\$900.00	\$5,310.00
Karen Dempski	Paralegal	0.20	\$340.00	\$68.00
Nathan Kuenzi	Associate	2.30	\$550.00	\$1,265.00
Timothy Burns	Partner	6.00	\$1,120.00	\$6,720.00

Total Due This Invoice: \$14,587.00

Burns | Bair

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The Roman Catholic Bishop of Oakland UCC

Issue Date : 8/26/2025

Bill # : 02004

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/10/2025	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case developments and strategy (.8);	0.80	\$896.00
7/17/2025	Timothy Burns	Participate in state court counsel meeting on insurance issues (1.1);	1.10	\$1,232.00
7/24/2025	Timothy Burns	Participate in state court counsel meeting re case insurance issues, strategy, and related developments (1.2);	1.20	\$1,344.00
7/25/2025	Timothy Burns	Prepare for (.2) and participate in Committee meeting for insurance purposes re case developments and strategy (1.1);	1.30	\$1,456.00
Totals for Committee Meetings			4.40	\$4,928.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/11/2025	Jesse Bair	Review and respond to correspondence with KBK re budget estimate requested by debtor (.1);	0.10	\$90.00
7/14/2025	Jesse Bair	Draft Burns Bair interim budget (.4); correspond with the Committee re same (.1);	0.50	\$450.00
7/28/2025	Jesse Bair	Review and edit monthly fee statement and correspond with KBK and B. Horn-Edwards re same (.2);	0.20	\$180.00
7/28/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and correspond with J. Bair re same (.3);	0.30	\$102.00
Totals for Fee Applications			1.10	\$822.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/16/2025	Nathan Kuenzi	Participate in hearing on renewed motion for lift stay (3.7);	3.70	\$2,035.00
7/16/2025	Timothy Burns	Participate in hearing on renewed motion to lift stay (3.7);	3.70	\$4,144.00
7/18/2025	Jesse Bair	Attend status conference for insurance purposes re potential confirmation adjournment and related issues (1.0);	1.00	\$900.00
Totals for Hearings			8.40	\$7,079.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/2/2025	Timothy Burns	Review memo re insurance strategy from state court counsel (.3); review and respond to correspondence with Committee professionals re same (.2);	0.50	\$560.00
7/2/2025	Timothy Burns	Conference with J. Prol re plan drafting and insurance strategy (.6);	0.60	\$672.00
7/2/2025	Jesse Bair	Review insurance memo from state court counsel re Plan issues and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
7/2/2025	Jesse Bair	Review insurance district court order requesting further status update (.1);	0.10	\$90.00
7/3/2025	Jesse Bair	Prepare for meeting with Committee professionals re case insurance issues and strategy (.2);	0.20	\$180.00
7/3/2025	Timothy Burns	Participate in call with state court counsel re mediation and insurance strategy (.2);	0.20	\$224.00
7/7/2025	Timothy Burns	Participate in call with Lowenstein and J. Bair re litigation strategy and insurance strategy (.7);	0.70	\$784.00
7/7/2025	Jesse Bair	Participate in call with Committee professionals re Plan insurance issues and ongoing case negotiations (.7);	0.70	\$630.00
7/7/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re insurance-related Plan objections (.1);	0.10	\$90.00
7/7/2025	Jesse Bair	Review revised insurance Plan memo and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
7/7/2025	Nathan Kuenzi	Analyze issues pending with respect to insurance aspects of Plan objection and correspond with Committee professionals re same (.2);	0.20	\$110.00
7/10/2025	Timothy Burns	Review Debtors' and Insurers' oppositions to renewed motion re lifting stay (.8);	0.80	\$896.00

7/11/2025	Jesse Bair	Review and respond to correspondence with Lowenstein re status update to Judge Corley in the insurance district court action (.1);	0.10	\$90.00
7/11/2025	Jesse Bair	Participate in conference with T. Burns re additional case developments, strategy, and next-steps re case litigation and settlement issues (.2);	0.20	\$180.00
7/11/2025	Timothy Burns	Participate in conference with J. Bair re case developments, mediation, and litigation strategy (.2);	0.20	\$224.00
7/11/2025	Timothy Burns	Review and respond to correspondence with Lowenstein re draft insurance status report (.2);	0.20	\$224.00
7/13/2025	Timothy Burns	Review multiple correspondence with Committee professionals and state court counsel re mediation and insurance strategy (.4); participate in call with B. Weisenberg re same (.3);	0.70	\$784.00
7/13/2025	Jesse Bair	Review various correspondence with state court counsel, the Committee, and Committee professionals re case developments, upcoming filings, and insurance Plan issues (.3);	0.30	\$270.00
7/14/2025	Timothy Burns	Review lift stay reply and respond to related correspondence re same (.3);	0.30	\$336.00
7/14/2025	Jesse Bair	Review the debtor's opposition to the Committee's renewed motion to lift stay (.2); review certain insurers' opposition to same (.2); review Pacific's opposition to same (.2); review and edit the Committee's reply in support of same (.4);	1.00	\$900.00
7/14/2025	Jesse Bair	Review correspondence with the debtor and Committee professionals re ongoing settlement negotiations (.1);	0.10	\$90.00
7/14/2025	Jesse Bair	Prepare for upcoming Committee and state court counsel meetings re case developments and related insurance issues (.2);	0.20	\$180.00
7/14/2025	Timothy Burns	Prepare memo re insurance strategy in preparation for state court counsel meeting (.8);	0.80	\$896.00
7/15/2025	Nathan Kuenzi	Analyze filings in preparation for upcoming hearing on lift stay motion (.6);	0.60	\$330.00
7/16/2025	Timothy Burns	Participate in call with Lowenstein re stay relief hearing and case strategy (.9);	0.90	\$1,008.00
7/16/2025	Timothy Burns	Participate in call with state court counsel re stay relief hearing and case strategy (.2); participate in additional conference with Lowenstein re same (.2);	0.40	\$448.00

7/16/2025	Brian Cawley	Draft summary of Diocesan lift stay cases nationwide in preparation for hearing on renewed lift stay motion (1.1);	1.10	\$605.00
7/16/2025	Nathan Kuenzi	Analyze aggregate limits of coverage (and non-applicability of said aggregates to sexual abuse claims) in various RCBO insurance policies in preparation for lift stay hearing (1.2);	1.20	\$660.00
7/16/2025	Timothy Burns	Prepare for hearing on renewed motion to lift stay (1.9);	1.90	\$2,128.00
7/16/2025	Jesse Bair	Correspond with Committee professionals re preparations for lift stay hearing and revise related analysis in connection with same (.2);	0.20	\$180.00
7/17/2025	Timothy Burns	Prepare for state court counsel meeting on insurance issues (1.2);	1.20	\$1,344.00
7/17/2025	Timothy Burns	Participate in conference with B. Weisenberg re case insurance issues, state court counsel meeting re same, and hearing outcome (.6);	0.60	\$672.00
7/17/2025	Timothy Burns	Participate in call with J. Prol and J. Bair re mediation, confirmation, and insurance issues (.4);	0.40	\$448.00
7/17/2025	Karen Dempksi	Docket/calendar continued hearing re confirmation (.1);	0.10	\$34.00
7/17/2025	Jesse Bair	Review proposed order lifting stay and related correspondence with the insurers re same (.1);	0.10	\$90.00
7/17/2025	Jesse Bair	Prepare for upcoming status hearing (.2);	0.20	\$180.00
7/17/2025	Jesse Bair	Review correspondence from the debtor re ongoing negotiations (.1);	0.10	\$90.00
7/17/2025	Jesse Bair	Participate in portion of call with J. Prol and T. Burns re hearing outcome, case developments, and next-steps (.2);	0.20	\$180.00
7/17/2025	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$90.00
7/18/2025	Jesse Bair	Review and respond to correspondence with state court counsel re lift stay insurance issues (.1);	0.10	\$90.00
7/18/2025	Jesse Bair	Review the debtor's motion to continue the confirmation hearing and Pacific's response to same (.2);	0.20	\$180.00
7/21/2025	Karen Dempksi	Docket/calendar status conferences (.1);	0.10	\$34.00
7/21/2025	Jesse Bair	Participate in call with Lowenstein re case status, strategy, negotiations, and next-steps (.3);	0.30	\$270.00
7/22/2025	Timothy Burns	Participate in call with Committee professionals re lift stay issues (.2);	0.20	\$224.00
7/22/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re case insurance strategy (.1);	0.10	\$90.00

7/23/2025	Jesse Bair	Review correspondence with Committee professionals and state court counsel re case insurance issues and lift stay (.2);	0.20	\$180.00
7/23/2025	Nathan Kuenzi	Analyze insurance allocation numbers in connection with ongoing case insurance issues (.8);	0.80	\$440.00
7/23/2025	Timothy Burns	Review and respond to correspondence with B. Weisenberg re insurance adversary and case strategy (.2);	0.20	\$224.00
7/23/2025	Timothy Burns	Participate in conference with B. Weisenberg re upcoming insurance-related motions and reports (.2);	0.20	\$224.00
7/24/2025	Timothy Burns	Prepare for state court counsel meeting re case insurance issues (.7);	0.70	\$784.00
7/24/2025	Timothy Burns	Participate in call with Lowenstein re mediation and case strategy (.5);	0.50	\$560.00
7/24/2025	Nathan Kuenzi	Analyze insurance issues involving potential approaches to plans of reorganization in preparation for meeting with state court counsel (2.2);	2.20	\$1,210.00
7/24/2025	Jesse Bair	Review memo re insurance Plan issue and potential structure (.3);	0.30	\$270.00
7/25/2025	Jesse Bair	Participate in conference with Committee professionals re case insurance issues and strategy (1.1);	1.10	\$990.00
7/25/2025	Jesse Bair	Provide instructions re preparing Committee insert to joint status report in the district court insurance action (.2);	0.20	\$180.00
7/25/2025	Jesse Bair	Correspond with the debtor and insurers re insurance joint status report (.1);	0.10	\$90.00
7/25/2025	Nathan Kuenzi	Participate in conference with Committee professionals re case insurance issues and next-steps (1.1);	1.10	\$605.00
7/25/2025	Timothy Burns	Participate in conference with Committee professionals re case insurance issues and strategy (1.1);	1.10	\$1,232.00
7/25/2025	Timothy Burns	Review various correspondence with state court counsel re case insurance issues (.4);	0.40	\$448.00
7/25/2025	Alexander Castro	Research CA law on 11580 assignee issues in connection with insurance Plan structures (1.2);	1.20	\$564.00
7/27/2025	Jesse Bair	Review Order granting the Committee's renewed motion to lift the stay and related correspondence with state court counsel and Committee professionals re same (.2);	0.20	\$180.00
7/28/2025	Jesse Bair	Correspond with state court counsel re lift stay case developments and insurance issues (.1);	0.10	\$90.00

7/28/2025	Jesse Bair	Review the debtor/insurers' draft status report in the district court insurance action (.4); draft revised Committee insert to same (.6); review and respond to correspondence with Committee professionals re same (.2);	1.20	\$1,080.00
7/28/2025	Nathan Kuenzi	Draft initial version of Committee section of joint status report in the insurance adversary proceeding, including review of transcripts of prior hearings on motion to hold case in abeyance (2.9);	2.90	\$1,595.00
7/28/2025	Nathan Kuenzi	Review the insurers' draft of Joint Status Report (.6);	0.60	\$330.00
7/28/2025	Timothy Burns	Participate in call with state court counsel re insurance strategy issues (.3);	0.30	\$336.00
7/28/2025	Alexander Castro	Finish researching CA law on 11580 assignee issues in connection with insurance Plan structures and draft memo summarizing same (1.9);	1.90	\$893.00
7/28/2025	Timothy Burns	Review and revise status report insert and status report (.4); review and respond to related correspondence with parties (.2);	0.60	\$672.00
7/29/2025	Nathan Kuenzi	Draft Committee's revisions to RCBO/Insurer Joint Status Report and review and respond to correspondence with parties re same and negotiation of final language (2.1);	2.10	\$1,155.00
7/29/2025	Timothy Burns	Review and edit further revised version of joint insurance status report (.5); review and respond to correspondence with parties re same (.2);	0.70	\$784.00
7/29/2025	Timothy Burns	Revise insurance strategy proposal memo (1.2);	1.20	\$1,344.00
7/29/2025	Timothy Burns	Review and respond to correspondence from insurer re changes to status report (.2);	0.20	\$224.00
7/29/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re potential revisions to Committee status report insert (.2); edit and revise the Committee's status report insert (.2); correspond with the debtor and insurers re same (.1); review the debtor's proposed edits to the joint status report (.2); review the insurers' additional proposed edits (.1); review and respond to additional correspondence with the debtor, insurers, and Committee professionals re same and finalization of submission (.2);	1.00	\$900.00
7/30/2025	Nathan Kuenzi	Analyze Westport letter to Judge Lafferty and draft response to the same (.8);	0.80	\$440.00
7/30/2025	Timothy Burns	Review Westport's request re mediation and provide instructions re preparing response to same (.2); participate in call with B. Weisenberg re same (.1); participate in call with state court counsel re same (.1);	0.40	\$448.00

7/30/2025 Timothy Burns	Review and revise draft letter to court re mediation (.2); review and respond to correspondence with Committee professionals re same (.2);	0.40	\$448.00
7/30/2025 Jesse Bair	Review Westport letter to Court re appointment of mediator and edit Committee draft response to same (.2);	0.20	\$180.00
7/31/2025 Timothy Burns	Review A. Castro's research summary re insurance assignability issues in connection with potential Plan structures (.2);	0.20	\$224.00
7/31/2025 Timothy Burns	Participate in call with state court counsel re lift stay cases (.2); review related correspondence re same (.2);	0.40	\$448.00
7/31/2025 Jesse Bair	Analyze insurance issues in connection with lift stay cases (.3); review correspondence with state court counsel re lift stay developments (.1);	0.40	\$360.00
7/31/2025 Timothy Burns	Review and respond to correspondence with B. Weisenberg re court filing re mediation (.2);	0.20	\$224.00
Totals for Insurance Recovery Activities		45.20	\$38,501.00
Total Hours and Fees		59.10	\$51,330.00

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	3.10	\$470.00	\$1,457.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	1.10	\$550.00	\$605.00
Jesse Bair	Partner	11.80	\$900.00	\$10,620.00
Karen Dempsey	Paralegal	0.20	\$340.00	\$68.00
Nathan Kuenzi	Associate	16.20	\$550.00	\$8,910.00
Timothy Burns	Partner	26.40	\$1,120.00	\$29,568.00

Total Due This Invoice: \$51,330.00

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 9/26/2025

Bill # : 02025

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

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

Fee Applications

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

Hearings

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

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

Insurance Recovery Activities

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

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

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

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

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

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

Total Hours and Fees	56.70	\$48,607.00
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EXPENSES

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

Timekeeper Summary

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

Total Due This Invoice: \$50,225.72