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*Counsel for the Debtor
 and Debtor in Possession*

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

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

**COVER SHEET TO SEVENTH INTERIM
 FEE APPLICATION 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 MAY 1, 2025, THROUGH
 AUGUST 31, 2025**

Judge: Hon. William J. Lafferty

Date: December 3, 2025

Time: 10:30 a.m.

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

Objection Deadline: November 5, 2025

Name of Applicant:	Foley & Lardner LLP
Name of Client:	The Roman Catholic Bishop of Oakland
Time Period covered by this application:	May 1, 2025 – August 31, 2025
Total compensation sought this period: ¹	\$2,741,636.25 ²
Total expenses sought this period: ³	\$61,501.03 ⁴
Petition date:	May 8, 2023
Retention date:	Effective as of May 8, 2023
Date of order approving employment:	June 15, 2023 [Docket No. 145]
Total fees approved by interim order to date:	\$12,768,602.35 ⁵
Total expenses approved by interim order to date:	\$183,239.62
Total allowed fees paid to date:	\$12,303,346.90 ⁶
Total allowed expenses paid to date:	\$183,239.62
Blended rate in this application for all attorneys:	\$848.08
Blended rate in this application for all timekeepers:	\$830.58
Fees sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$1,923,543.65
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$61,501.03
Number of professionals included in this application:	55
If applicable, number of professionals in this application not included in staffing plan approved by client:	

¹ Foley & Lardner LLP has agreed to not 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 Interim Application.

² This amount includes a reduction of \$3,193.75 for fees billed at 50% for non-working travel, as well as a reduction for six timekeepers due to *de minimis* amounts billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$3,089.50 related to said timekeepers.

³ Foley & Lardner LLP has agreed to not bill the Debtor *for the expenses* for its attorneys to travel to or from the Bay Area (e.g., airfare and ride share charges) in connection with this Bankruptcy Case, and such amounts are not included in this Interim Application. For the Interim Fee Period, the amount paid by Foley and not sought for reimbursement is \$27,138.15.

⁴ This amount reflects a reduction of \$81.00 for unallocated credits.

⁵ This amount includes the fee reductions agreed to between Foley and the Office of the United States Trustee of \$75,000.00 for Foley's First Interim Fee Application, and \$28,000.00 for Foley's Second Interim Fee Application. This amount includes the fee reductions agreed to between Foley and the Fee Examiner of \$20,355.50 for Foley's Third Interim Fee Application. This amount includes the fee reductions of \$27,619.00 and expense reductions of \$823.19 agreed to between Foley and the Fee Examiner for Foley's Fourth Interim Fee Application. This amount includes the fee reductions of \$27,442.50 and the expense reductions of \$2,330.80 agreed to between Foley and the Fee Examiner for Foley's Fifth Interim Fee Application. This amount includes the fee reductions of \$17,691.65 agreed to between Foley and the Fee Examiner for Foley's Sixth Interim Fee Application.

⁶ This amount does not include the holdback of \$465,255.45 which Foley was awarded by the Court in connection with its Sixth Interim Fee Application [Dkt. No. 2281], but which was not paid pursuant to the Court's Agreed Order Amending Procedures for Interim Compensation and Reimbursement of Professionals [Dkt. No. 2101] (the "Amended Interim Comp Order").

If applicable, difference between fees budgeted and compensation sought for this period:	See Exhibit F
Number of professionals billing fewer than 15 hours to the case during this period:	25 ⁷
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this application using the rates originally disclosed in the retention application:	No
Interim or Final:	Interim

SUMMARY OF MONTHLY FEE STATEMENTS FOR THE INTERIM FEE PERIOD

Date Filed	Period Covered	70% of Fees Requested	Total Fees Incurred	Expenses Requested	Fees Approved	Expenses Approved	Amount Received
06/30/25 (Dkt. No. 2108)	05/01/25 – 05/31/25	\$828,106.30	\$1,179,815.25 ⁸	\$11,861.18	\$828,106.30	\$11,861.18	\$839,967.48
07/30/25 (Dkt. No. 2177)	06/01/25 – 06/30/25	\$440,746.95	\$629,638.50	\$19,117.97	\$440,746.95	\$19,117.97	\$459,864.92
09/02/25 (Dkt. No. 2269)	07/01/25 – 07/31/25	\$364,992.95	\$521,418.50	\$17,855.18	\$364,992.95	\$17,855.18	\$382,848.13
09/30/25 (Dkt. No. 2352) ⁹	08/01/25 – 08/31/25	\$289,697.45	\$413,853.50	\$12,666.70	\$289,697.45	\$12,666.70	\$302,364.15
Total		\$1,923,543.65	\$2,744,725.75	\$61,501.03	\$1,923,543.65	\$61,501.03	\$1,985,044.68

Summary of Any Objections to Monthly Fee Statements: None

⁷ As noted above, Foley & Lardner LLP is not requesting payment of fees related to six timekeepers due to *de minimis* amounts billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$3,089.50. related to said timekeepers. However, Foley requests payment of fees for the remaining timekeepers who billed fewer than 15 hours during the Interim Fee Period, because their expertise is unique and necessary for certain discrete issues in the case (*e.g.*, trusts and estates, constitutional law, labor and employment, real estate, tax matters, financing, corporate governance, insurance, and bankruptcy matters, as well as assistance with the expedited discovery in connection with Plan confirmation), including several timekeepers who have spent significant time on this case during other fee application periods, or who are continuing their work on the case in future time periods.

⁸ This amount includes a reduction of \$3,193.75 for fees billed at 50% for non-working travel.

⁹ Foley filed its CNO for this fee statement on October 14, 2025 [Docket No. 2376] and expects payment from RCBO shortly. As such, this Application assumes the payment of 70% of the fees and 100% of the expenses from this fee statement has been made as of the filing of this Application.

1 Compensation and Expenses Sought in this Interim Application and Not Yet Paid: **\$818,092.60¹⁰**
2 Compensation to be Paid for Sixth Interim Fee Application Holdback pursuant to Amended Interim
3 Comp Order: **\$465,255.45**
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27 ¹⁰ This amount reflects the write-off of \$3,089.50 for six timekeepers who billed under 15 hours during the
28 Interim Fee Period, which was not accounted for in the Monthly Fee Statements.

FOLEY & LARDNER LLP

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In re:

THE ROMAN CATHOLIC BISHOP OF
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**SEVENTH INTERIM FEE APPLICATION 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 MAY 1,
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I. INTRODUCTION

Foley & Lardner LLP (“Foley” or the “Firm”), as general bankruptcy counsel to The Roman Catholic Bishop of Oakland, a California corporation sole and the debtor and debtor in possession (the “Debtor” or “RCBO”),¹¹ respectfully submits this seventh interim application for allowance of compensation and reimbursement of actual and necessary expenses (the “Interim Application”) for services performed as general bankruptcy counsel to the Debtor for the period of May 1, 2025 through August 31, 2025 (the “Interim Fee Period”) in the above-captioned Chapter 11 bankruptcy case (the “Bankruptcy Case”).

Foley seeks interim approval of its fees incurred and reimbursement of expenses during the Interim Fee Period totaling **\$2,803,137.28**. This sum represents compensation in the amount of **\$2,741,636.25** for 3,296.4 hours worked by Foley’s professionals for legal services provided to the Debtor in this matter,¹² and reimbursement for expenses incurred in the amount of **\$61,501.03**. Foley has received a total of **\$1,985,044.68** in payments for services during the Interim Fee Period, based on its monthly fee statements pursuant to the interim compensation procedures approved by the Court, and therefore now requests the balance of **\$818,092.60** for the months covered in this Interim Application to be paid to the Firm. Foley also seeks payment of the holdback of **\$465,255.45** which Foley was awarded by the Court in connection with its Sixth Interim Fee Application [Dkt. No. 2281], but which was not paid pursuant to the Court’s Amended Interim Comp Order.

This Interim Application is based upon the contents hereof, together with the exhibits, the declaration of Ann Marie Uetz filed concurrently herewith, the pleadings, papers, and records on file in

¹¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Order.

¹² Foley & Lardner LLP is not requesting payment of fees related to six timekeepers due to *de minimis* amounts billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$3,089.50 related to said timekeepers, and the amounts set forth here reflect this write-off. However, Foley requests payment of fees for the remaining timekeepers who billed fewer than 15 hours during the Interim Fee Period, because their expertise is unique and necessary for certain discrete issues in the case (*e.g.*, trusts and estates, constitutional law, labor and employment, real estate, tax matters, financing, corporate governance, insurance, and bankruptcy matters, as well as assistance with the expedited discovery in connection with Plan confirmation), including several timekeepers who have spent significant time on this case during other interim periods, or who are continuing their work on the case in future time periods.

1 this case, and any evidence or argument the Court may entertain at the time of the hearing on the Interim
2 Application. This Interim Application is submitted considering the United States Department of Justice's
3 *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses*
4 *Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the "Large Case Guidelines").
5 Summary charts complying with the Large Case Guidelines and detailing the amount of fees charged and
6 hours worked by each of the Firm's professionals and paraprofessionals during the Interim Fee Period are
7 attached hereto as Exhibit B through Exhibit F.

8 II. BACKGROUND

9 A. General Background

10 On May 8, 2023 (the "Petition Date"), the Debtor filed its voluntary Chapter 11 petition
11 commencing the Bankruptcy Case. The Debtor continues to operate its ministry and manage its assets and
12 properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee
13 has been appointed in this Bankruptcy Case.

14 On May 23, 2023, the Office of the United States Trustee (the "US Trustee") filed its notice of
15 appointment of an Official Committee of Unsecured Creditors (the "Committee") [Docket No. 58].

16 The Debtor is a corporation sole organized under the laws of the State of California. The Debtor
17 conducts its civil affairs under the laws of the State of California and the United States of America and in
18 accordance with the Code of Canon Law, the ecclesiastical law of the Roman Catholic Church. Additional
19 information regarding the Debtor, its mission, ministries, and operations, and the events and circumstances
20 preceding the Petition Date, is set forth in the *Declaration of Charles Moore, Managing Director of*
21 *Alvarez & Marsal North America, LLC, Proposed Restructuring Advisor to the Roman Catholic Bishop*
22 *of Oakland, in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 19], which is
23 incorporated herein by reference.

24 B. Employment of Foley

25 On May 23, 2023, the Debtor filed the *Debtor's Application to Employ Foley & Lardner LLP as*
26 *General Bankruptcy Counsel Pursuant to 11 U.S.C. §§ 327(a), 330, 331 & 1107, and Rules 2014 and*
27 *2016 of the Federal Rules of Bankruptcy Procedure* [Docket. No. 60] (the "Retention Application"). The
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1 Court approved the Retention Application on June 15, 2023, entering the *Order Approving Debtor's*
2 *Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§*
3 *327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Docket
4 No. 145] (the "Foley Retention Order"). A copy of the Foley Retention Order is attached hereto as
5 **Exhibit A.**

6 **C. Summary of Case Status and Developments**

7 During the Interim Fee Period covered by this Interim Application, the Debtor's efforts were
8 focused on its goal of presenting a plan of reorganization that will (a) ensure a fair and equitable outcome
9 for survivors of sexual abuse, and (b) allow the Debtor to stabilize its finances, continue its mission to
10 serve the needs of the faithful within the Diocese of Oakland, and continue to provide services to
11 underserved people and groups in the East Bay. Following approving this April of the Debtor's disclosure
12 statement (as amended, the "Disclosure Statement") in support of its plan of reorganization (as amended,
13 the "Plan"), this focus included undertaking responses to the Committee's extensive discovery requests
14 regarding Plan confirmation, contesting the Committee's unending litigation including its two adversary
15 proceedings, its renewed lift stay motion, its opposition to the Debtor's payment of rent, and its practice
16 of opposing just about every request the Debtor made of the Court, working to prepare for an anticipated
17 contested plan confirmation hearing, and ultimately, once it became clear a contested confirmation hearing
18 in late August was not feasible in light of the Debtor's cash position, seeking a continuance of the
19 confirmation hearing and preparing a motion to dismiss before seeking a final return to mediation with
20 both the Committee and certain of the Debtor's insurers (the "Insurers"). The Debtor has also continued
21 to pursue recovery from the Insurers through the pending coverage litigation in District Court. Each of
22 these areas is discussed in more detail below.

23 **1. Plan of Reorganization**

24 The Debtor's primary focus during the first two months of the interim period, and therefore much
25 of Foley's work, was on moving forward toward confirmation of its Plan. Although ultimately the Debtor
26 determined it could not realistically continue to seek confirmation at the hearings originally scheduled in
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late August and early September, the Debtor continues to believe the Plan is fair and equitable to all creditors, including abuse survivors.

On November 8, 2024, the Debtor filed *Debtor's Plan of Reorganization* [Docket No. 1444] (the "Original Plan") and accompanying *Disclosure Statement for the Debtor's Plan of Reorganization* [Docket No. 1445] (the "Original Disclosure Statement"). The Original Plan reflected extensive work toward the Debtor's goal of filing a plan that provides for fair and equitable treatment of survivors of abuse and allows the Debtor to continue its critical mission of serving its parishioners and underserved persons and groups in the East Bay. On November 13, 2024, the Debtor filed *Motion for Order (I) Approving Disclosure Statement; and (II) Establishing Procedures for Plan Solicitation, Notice, and Balloting* [Docket No. 1453] (the "Approval Motion").

The Committee objected to approval of the Disclosure Statement on multiple bases, raising at least nineteen separate specific objections to the Original Disclosure Statement [Docket No. 1518]. After numerous rounds of briefing, and amendments by the Debtor to address certain of the issues raised by the Committee and by the Court, on March 17, 2025, the Debtor filed its third amended plan [Docket No. 1830] (the "Third Amended Plan") and third amended disclosure statement [Docket No. 1831] (as amended, the "Third Amended Disclosure Statement").

The Third Amended Disclosure Statement came for hearing on April 1, 2025. The Committee had strenuously opposed approval of the Disclosure Statement from filing of the Original Disclosures Statement on November 8, 2024, up to the hearing on April 1. However, immediately prior to that hearing the Committee informed the Debtor it would consent to approval of the disclosure statement subject to agreement on a schedule for discovery and confirmation hearing. Following the filing of final technical modifications to the Disclosure Statement, reflected in the final Third Amended Disclosure Statement [Docket No. 1873] and other solicitation documents, the Disclosure Statement was approved at a brief final hearing held on April 3, 2025. The Court entered its *Order (I) Approving Third Amended Disclosure Statement; (II) Establishing Procedures for Plan Solicitation, Notice, and Balloting* [Docket No. 1877] (the "Disclosure Statement Order"), on April 4, 2025, approving the Disclosure Statement and forms of notices and ballots for Plan solicitation.

1 The Plan incorporates the agreement reached with the debtors' historical insurers (the "Insurers")
2 regarding assignment of insurance coverage for the benefit of the survivors of abuse. While the Debtor
3 and the Committee were not able to reach agreement on any terms of the Plan, many of the Plan's terms
4 reflect numerous stated requests of the Committee regarding structure and terms. To compensate the
5 victims and survivors of sexual abuse, the Plan creates a trust for the benefit of survivors of clergy abuse
6 (the "Survivors' Trust") and, for the benefit of survivors (i) funds the Survivors' Trust with \$115 million
7 in cash from the Debtor over a period of four years, (ii) provides for an additional contribution of up to
8 \$28.5 million from the Roman Catholic Welfare Corporation of Oakland ("RCWC") subject to claimants
9 providing voluntary releases to RCWC,¹³ (iii) assigns to the Survivors' Trust the Debtor's insurance rights
10 in policy's covering claims for sexual abuse, and (iv) creates a process for each survivor to recover either
11 from the Survivors' Trust or from insurance coverage at the survivor's sole election. The terms of the
12 Plan are more fully described in the Debtor's Third Amended Disclosure Statement.

13 Pursuant to the Disclosure Statement Order, the Debtor completed solicitation of the Plan through
14 the efforts of Foley and Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), the Debtor's
15 claims and noticing agent. Concurrently, the Debtor reached agreement with the Committee on a final
16 scheduling for the hearing on confirmation of the Plan, reflected in the agreed *Order Setting Certain Dates*
17 *and Deadlines in Connection With Confirmation of the Debtor's Third Amended Plan of Reorganization*
18 [Docket No. 1893], entered by the Court on April 15, 2025, and subsequently modified by agreement of
19 the parties as reflected in the *Order Amending Certain Dates and Deadlines in Connection With*
20 *Confirmation of the Debtor's Third Amended Plan of Reorganization* [Docket No. 2055] (the "Amended
21 Confirmation Scheduling Order"), entered on June 10, 2025.

22 Consistent with the approved confirmation schedule, on May 23, 2025, the Debtor filed its Notice
23 of Plan Supplement [Docket No. 2004] (the "Plan Supplement"). The Plan Supplement included the form
24 of exit financing documents negotiated with RCC as the Debtor's exit lender, the form of settlement
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27 ¹³ RCWC is the entity that owns and operates Catholic schools within the Diocese of Oakland. Unfortunately,
28 no survivors who asserted claims against RCWC elected to provided releases to RCWC in connection with the Plan.
Thus, the contemplated contribution by RCWC in exchange for those releases will not be made.

1 agreement with CCCEB for transfer of the Cathedral property and chancery offices to the Debtor, and the
2 form of the Debtor's proposed survivor's trust agreement and related documents.

3 2. Discovery in Connection with Plan Confirmation

4 In light of the Committee's extensive discovery efforts in connection with Plan confirmation, the
5 Confirmation Scheduling Order and Amended Confirmation Scheduling Order provided for an immediate
6 start to discovery following entry of the Disclosure Statement Order. Pursuant to this schedule, written
7 discovery requests were due to be served no later than April 11, 2025, and the Debtor and Committee
8 exchanged requests for production of documents and interrogatories on that date. The Committee's
9 requests to the Debtor included 98 separate requests for production, notwithstanding the thousands of
10 documents previously produced by the Debtor, and 19 separate interrogatories.

11 Responding to the Committee's discovery requests has been a massive project, especially in light
12 of the accelerated time frame made necessary by the urgency of getting to Plan confirmation. Foley
13 collected approximately 430,000 emails, whittled down to approximately 130,000 by use of search terms.
14 These were reviewed by a dedicated document review team of fourteen associates and two partners. Foley
15 made four separate, significant document productions to the Committee. The first, on May 14, 2025, was
16 approximately 3,500 documents and 42,000 pages. The second, on May 23, 2025, was approximately
17 5,500 documents and 40,000 pages. The third, on May 29, 2025, was approximately 25,000 documents
18 and 138,000 documents. The fourth, on June 1, 2025, was approximately 9,000 documents and 53,000
19 pages. In addition to the Debtor documents, Foley processed and produced approximately 3,000 emails
20 on behalf of VeraCruz in response to the Committee's subpoena directed to VeraCruz. As part of the
21 Debtor document production, Foley deployed a team of 12 attorneys to determine whether any additional
22 documents were located at any of the Churches.

23 In addition to the requests directed to the Debtor, the Committee also served 85 separate subpoenas
24 directed to individual priests serving as Pastors of Churches within the Diocese. To address this massive
25 overreach, the Debtor filed a motion to quash on April 25, 2025. [Docket No. 1924.] The Court granted
26 that motion at a hearing on May 13, 2025. At the same time, the Committee moved for a protective order
27 regarding certain requests for production and interrogatories served by the Debtor seeking the basis for
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the Committee's decision-making in opposing the Plan [Docket No. 1922]. This motion was granted in part and denied in part at the May 13 hearing.

Between late May and mid-June 2025, the Committee conducted ten depositions of fact witnesses, and the Debtor conducted its single deposition of the Committee's designated representative. The Debtor also worked with five expert witness who provided expert reports in support of confirmation and reviewed and analyzed the expert reports provided by the Committee's experts.

With numerous discovery related deadlines throughout May and June, much of the Foley's time during the first two months of the Interim Period addressed Plan-related Discovery.

3. *The Committee's Adversary Proceedings and Motions, and Defending Against the Committee's "Alternative Vision" for the Case*

Immediately after the filing of the Original Disclosure Statement in November 2024, the Committee waged contentious litigation on multiple fronts to pursue its "alternative vision" for the case. While much of this was resolved through denial of the Committee's multiple standing motions and first relief from stay motion prior to the Interim Fee Period, various aspects of the Committee's litigation continued into the Interim Fee Period, requiring Foley to expend substantial resources in response.

A. *The Committee's Adversary Proceedings*

On November 20, the Committee filed its first adversary proceeding complaint against the Debtor, the Oakland Parochial Fund ("OPF"), and various Churches seeking (i) declaratory relief that the real property Churches and funds are property of the estate and (ii) substantive consolidation of the Debtor and the named Church defendants [Adv. No. 24-04051] (the "First Adversary Proceeding").¹⁴

Moreover, less than a week before the initial hearing on the Original Disclosure Statement, on December 11, the Committee filed a second adversary proceeding against the Debtor, Adventus, RCWC, and Roman Catholic Cemeteries of the Diocese of Oakland, Inc. ("RCC") seeking (i) declaratory relief that all property of Adventus, RCWC, and RCC is property of the estate and (ii) substantive consolidation

¹⁴ This was filed concurrently with the Committee's first motion for standing to prosecute claims of the estate [Docket No. 1462]. A second standing motion was filed by the Committee on December 16, 2025 [Docket No. 1536]. Both standing motions were denied prior to the Interim Period covered by this Application.

1 of Adventus, RCWC, and RCC into the Debtor's Chapter 11 bankruptcy [Adv. No. 24-04053] (the
2 "Second Adversary Proceeding," together with the First Adversary Proceeding, the "Adversary
3 Proceedings").

4 The Debtor filed motions to dismiss the original complaints in the Adversary Proceedings on
5 January 24, 2025, and strongly disputes the factual and legal contentions contained therein. The non-
6 debtor defendants in each of the Adversary Proceedings also filed motions to dismiss on the same date
7 (together with the motions filed by the Debtor, the "First Motions to Dismiss").

8 As set forth in the Debtor's First Motion to Dismiss [Adv. No. 24-04051, Docket No. 11], the
9 original complaint in the First Adversary Proceeding asked for relief that was almost entirely meaningless
10 and could not achieve any real benefit for creditors. The Committee's causes of action to consolidate
11 Churches into the Debtor's bankruptcy estate, or for declaratory relief holding that Church property is
12 property of the bankruptcy estate were meaningless, because, as the Debtor acknowledges, the Churches
13 are not separate from the debtor as a matter of applicable civil law, and property of the Churches is already
14 property of the bankruptcy estate, subject to certain funds being held in trust based on donor restrictions.
15 While it is the Debtor's position that Church real property cannot be involuntarily liquidated, the First
16 Adversary Proceeding had no bearing on that issue.

17 Likewise, as set forth in the Debtor's First Motion to Dismiss the original complaint in the Second
18 Adversary Proceeding [Adv. No. 24-04053, Docket No. 14], the original complaint in the Second
19 Adversary Proceeding, seeking similar relief as to Non-Debtor Catholic Entities Adventus, RCWC, and
20 RCC was likewise meritless and would not result in any benefit to creditors. RCWC and RCC are
21 separately incorporated non-profit organizations under California law, that respectively operate the
22 Schools and cemeteries within the diocese. Adventus is likewise a separate non-profit organization under
23 California law that owns certain real property. As a legal matter, the Committee's claims that they are
24 indistinguishable from the Debtor were extremely unlikely to succeed, as borne out by the Court's
25 ultimately dismissal.

26 The First Motions to Dismiss were heard on March 4, 2025. After taking the matter under
27 submission, the Court entered its *Order After Hearing on Motions to Dismiss* [Adv. No. 24-04051, Docket
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No. 34] on April 4, 2025, dismissing the complaint in the First Adversary Proceeding in its entirety. Similarly, the Court entered its *Order After Hearing on Motions to Dismiss* [Adv. No. 24-04053, Docket No. 30] on April 22, 2025, dismissing the complaint in the Second Adversary Proceeding in its entirety.

In both cases, dismissal was without prejudice. In particular, while the Court found that substantive consolidation of non-debtor non-profit corporations into the bankruptcy estate was contrary to the Bankruptcy Code and therefore not available under Section 105, the Court granted leave to give the Committee the opportunity to attempt to plead based on state law alter ego principles. In addition, while the donor-restricted funds held by the Debtor (“Restricted Funds”) were not substantively addressed in the original complaint, the Court gave the Committee the opportunity to attempt to re-plead the complaint in the First Adversary Proceeding with substantive claims as to the Debtor’s Restricted Assets.

The Committee filed its first amended complaint in the First Adversary Proceeding on April 30, 2025. [Adv. No. 24-04051, Docket No. 36]. After expending substantial estate resources attempting to plead substantial consolidation and declaratory relief claims against the Debtor’s Churches and the Oakland Fund (“OPF”) in the original complaint, the Committee apparently recognized those claims were without merit and pivoted to asserting claims related to Restricted Assets in its first amended complaint. Shortly thereafter, on May 6, 2025, the Committee filed its first amended complaint in the Second Adversary Proceeding. [Adv. No. 24-04053, Docket No. 32]. Here, the Committee sought to replead its substantive consolidation claims, this time expressly based on alter ego under California law, although it did not add any material facts to the those that were already found to be inadequate in the original complaint.

The Debtor and the non-debtor defendants moved to dismiss the amended complaints in both adversary proceedings. As to the First Adversary Proceeding, while the Debtor recognized that there are material disputes as to Restricted Funds, the Debtor moved to dismiss on the basis that the Committee failed to make any attempt to name or provide notice to the individual donors who have a protected interest in how the property they donated is used. [See Adv. No. 24-04051, Docket No. 44] (the “Restricted Funds Motion to Dismiss”). As to the Second Adversary Proceeding, the Debtor and the non-debtor defendants

1 each moved to dismiss primarily on the basis that the Committee had entirely failed to adequately plead
2 alter ego despite the best efforts of skilled counsel after nearly two years of informal discovery into every
3 aspect of the Debtor's finances. [See Adv. No. 24-04053, Docket No. 41] (the "Substantive Consolidate
4 Motion to Dismiss").

5 The Court heard both Motions to Dismiss on June 4, 2025. Following the hearing, the Court denied
6 the Debtor's limited motion to dismiss the First Adversary Proceeding. [See Adv. No. 24-04051, Docket
7 No. 60]. The Debtor filed its answer on July 1, 2025, and the parties thereafter reached agreement on a
8 tentative schedule for discovery and pre-trial matters, with a proposed trial commencement date in late
9 January 2026. Based on this schedule, both the Debtor and Committee served Rule 26 initial disclosures,
10 followed by initial written discovery, and thereafter propounded responses to the other party's written
11 discovery. In connection with the Debtor's motion to dismiss the Bankruptcy Case and the return to
12 mediation (both as discussed below), the parties agreed to a 30-day stay of all dates. Ultimately, the Debtor
13 does not believe that the First Adversary Proceeding will result in any material benefit to the estate.

14 Following the June 4, 2025 hearing, the Court granted the Substantive Consolidation Motion to
15 Dismiss, together with the parallel motion to dismiss by the non-debtor defendants, dismissing the Second
16 Adversary Proceeding with prejudice. The Court's findings of fact and conclusions of law were stated on
17 the record at a hearing held on July 16, 2025. The Court's order dismissing the Second Adversary
18 Proceeding with prejudice was entered on July 26, 2025 [See Adv. No. 24-04053, Docket No. 55].

19 Despite the Court's well-reasoned and extensive findings and conclusions, the Committee was
20 unwilling to accept the Court's determination. It both appealed the Court's dismissal order and filed a
21 motion for reconsideration of the Court's dismissal with prejudice, both on August 8, 2025 [See Adv. No.
22 24-04053, Docket No. 57] (the "Motion to Reconsider"). The Debtor filed its opposition to the Motion to
23 Reconsider on August 27, 2025 [See Adv. No. 24-04053, Docket No. 67], and the matter came for hearing
24 on September 9, 2025. The Court has not yet ruled on the Motion to Reconsider.

25 *B. The Committee's Renewed Motion to Lift the Stay*

26 Also on November 20, 2024, the Committee filed a motion to lift the automatic stay [Docket No.
27 1460] (the "Lift Stay Motion") to allow six unspecified state court actions to proceed to trial or individual
28

1 settlements in order to (a) allegedly help establish benchmark values for all sexual abuse claims in this
2 Chapter 11 Case, (b) “unlock” available insurance and (c) allow claims against non-debtors named as
3 defendants in the state court actions to proceed. The Lift Stay Motion also sought to pause the confirmation
4 process. The Lift Stay Motion denied as set forth in the Court’s order entered on February 12, 2025
5 [Docket No. 1721].

6 On June 25, 2025, the Committee filed its *Renewed Motion of The Official Committee of*
7 *Unsecured Creditors to Lift The Automatic Stay to Permit Certain Plaintiffs’ Personal Injury Claims to*
8 *Proceed in State Court* [Docket No. 2093] (the “Renewed Lift Stay Motion”). The Renewed Lift Stay
9 Motion sought substantially the same relief the Committee sought in the original Lift Stay Motion. The
10 Debtor filed its opposition on July 9, 2025 [Docket No. 2112], arguing that allowing test cases to proceed
11 would not materially benefit this case, because there was no realistic possibility of the cases being selected
12 and proceeding to trial or the point of settlement on a time frame beneficial to the bankruptcy case.
13 Following a hearing on July 16, 2025, the Court granted the motion, as reflected in its order entered on
14 July 25, 2025 [Docket No. 2168]. While the Debtor has diligently worked with the Committee and
15 Plaintiff’s liaison counsel regarding selection of test cases, as of this filing the cases have not even been
16 selected and approved by the Superior Court. This is despite the Committee’s repeated representations to
17 the Court that at least one case would be ready for trial within weeks, and others in a matter of a few
18 months.

19 4. Continuance of Plan Confirmation and the Motion to Dismiss the Bankruptcy
20 Case

21 Although the Debtor believed, and continues to believe, its Plan is fair and equitable, and could be
22 confirmed notwithstanding the Committee’s objections, the exponential escalation of legal fees resulting
23 from the Committee’s litigation in opposition to the Plan eventually forced the Debtor to seek a
24 modification of the original schedule for confirmation. The Debtor had originally projected \$1.4MM per
25 month for professional fees through September 2025, and but had to increase its projection to \$3.9MM
26 for May through August 2025, and then \$2.1MM in September 2025 – and even then, it appeared to the
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28

Debtor the increase in its projections was still not enough to cover the fees for work being driven by the Committee.¹⁵

On July 16, 2025, because of the escalating legal burn, the Debtor filed its *Debtor's Motion to Continue Confirmation Hearing and to Reset Confirmation Schedule* [Docket No. 2147] (the "Motion to Continue"). The Debtor believed this motion was necessary as a result of the unexpected high costs of litigation regarding the Plan, to allow the Debtor sufficient time to sell certain real estate and other assets to generate needed cash reserves for professional fees and effective date obligations. Following a hearing on July 18, 2025, the Court granted the Motion to Continue and set a status conference regarding Plan confirmation for November 12, 2025. [Docket No. 2162]. As set forth in more detail in the Motion to Continue, the continuance would allow the Debtor to monetize unrestricted assets to pay administrative expenses.

Following continuance of the Plan confirmation hearing, in a further effort to reach consensual resolution, the Debtor on August 25, 2025, presented the Committee with a further settlement offer, reflecting a total contribution by the Debtor and non-debtor entities (other than Insurers) of \$165 million. Unfortunately this did not result in settlement and indeed the Committee's response to the Debtor's further settlement offer only reinforced the Debtor's view at that time that a global settlement was not likely. As a result, and recognizing the Committee had proven that it would make a contested confirmation extraordinarily expensive, the Debtor determined it is not likely to be able to rehabilitate its operations before it becomes administratively insolvent. Based on this determination, the Debtor filed its *Debtor's Motion to Dismiss Chapter 11 Case Pursuant to 11 U.S.C. § 1112(b)* [Docket No. 2293] (the "Motion to Dismiss"). While the Motion to Dismiss was filed after the Interim Period, much of the work preparing it occurred prior to the end of the Interim Period.

¹⁵ The Committee's professionals billed approximately \$2.9MM for April and May 2025, compared with approximately \$1.8MM billed by the Debtor's professionals, and estimated June 2025 fees of at least \$1.9MM (in reality June fees did end up being lower than initial estimated by the Committee).

1 5. Work Toward Achieving a Global Settlement and Plan of Reorganization –
2 Mediation

3 As the Debtor has stated to this Court, while the Motion to Dismiss remains pending and is
4 scheduled to be heard October 29, 2025, the Debtor will continue to support efforts to reach a global
5 consensual resolution of the Chapter 11 Case. In fact, the Debtor also engaged in negotiations with certain
6 of the insurers through the mediators during the Interim Fee Period. Following status conferences held on
7 September 9 and 19, 2025, the Motion to Dismiss was set for hearing on October 29, 2025. This timing
8 allowed for a final global mediation with the Debtor, Committee, and Insurers that was held on October 7
9 and 8, 2025. All three mediators (Judges Newsome and Sontchi, and Tim Gallagher) attended and
10 participated in the mediation. Following this mediation, the Debtor believes it is possible all parties – the
11 Debtor, the Committee and the Insurers – will accept and align on a monetary amount to be contributed
12 by the Debtor and the Insurers to fund a global settlement. It is also possible all parties will not so agree.
13 The Debtor expects this will be known shortly and before the October 29th hearing on the Debtor’s Motion
14 to Dismiss.

15
16 6. The District Court Coverage Litigation

17 The insurance adversary proceeding pending before Judge Corley (the “Insurance Coverage
18 Litigation”) has been stayed except for written discovery since January 17, 2025, when the District Court
19 granted in part RCBO’s Motion to Hold Cases in Abeyance. [Dist. Ct. Docket. Nos. 166, 146]. In her
20 Order, Judge Corley directed the parties to “proceed to obtain all of the written discovery they believe is
21 needed in this insurance coverage dispute.” [Dist. Ct. Docket. No. 166]. Thereafter, the Parties exchanged
22 written discovery requests and have several document productions. In addition, the Parties have
23 exchanged written correspondence and engaged in extensive meet and confer discussions to address
24 questions and alleged deficiencies in the Parties’ respective document productions. For its part, the Debtor
25 has made extensive document productions in response to the Insurers’ document requests. In total, the
26 Debtor has produced more than 58,000 documents to the insurers, many of which it produced
27 notwithstanding its objections to the requests for certain of such documents on relevance and other
28

1 grounds. For example, while preserving its objections on, *inter alia*, relevance grounds to producing
2 documents pertaining to abuse survivors for whose claims the Debtor is not seeking insurance coverage
3 in the Insurance Case, the Debtor has produced many—estimated to be in the thousands—of documents
4 pertaining to such claimants. The Insurers, in contrast, have produced in the realm of 10,000 documents
5 between all insurer defendants combined. In addition, the Insurers stand on their objections and refuse to
6 produce documents in response to several of the Debtor’s document requests.

7 7. *Other Motions and Filings in Furtherance of the Bankruptcy Case*

8 On August 20, 2025, Judge Corley held a case management conference in the Insurance Coverage
9 Litigation, during which she ordered the parties to complete written discovery by October 2, 2025, and to
10 submit to the District Court a joint letter setting forth remaining discovery disputes by that date. [Dist. Ct.
11 Docket No. 183]. The deadline to submit join discovery dispute letters has since been extended to
12 November 4, 2025. [Dist. Ct. Docket No. 192].
13 Other Motions and Filings in Furtherance of the Bankruptcy Case

14 While the primary areas of the Debtor’s focus during the Interim Fee Period are described above,
15 Foley also addressed numerous other matters during the Interim Fee Period, as briefly summarized below,
16 and further described in the individual category narratives in the following section.

17 On August 1, 2025, the Debtor filed its *Fifth Motion for Entry of an Order, Pursuant To*
18 *Bankruptcy Rules 9006 and 9027, Enlarging The Period Within Which The Debtor May Remove Actions*
19 *Pursuant To 28 U.S.C. § 1452* [Docket No. 2185] (the “Removal Extension Motion”), which was granted
20 by the Court’s order entered on August 17, 2025 [Docket No. 2256], extending the deadline for removal
21 of state court actions through February 1, 2026.

22 Due to its deteriorating cash position, among other things, on August 19, 2025, the Debtor filed its
23 *Debtor’s Motion for Entry of an Order Authorizing (A) the Release of the Debtor’s Interests in Catholic*
24 *Church Support Services, Inc. Pursuant to 11 U.S.C. §§ 105 and 363, and (B) Approving Pledge*
25 *Agreements* [Docket No. 2239] (the “CCSS Divestment Motion”). Through the CCSS Divestment Motion,
26 the Debtor sought approval of an arrangement by which the Debtor will divest all rights regarding
27 oversight of and board appointments for Catholic Church Support Services, Inc. (“CCSS”), a non-profit
28

1 entity that provides cemetery management services including to Roman Catholic Cemeteries of the
2 Diocese of Oakland, Inc. (“RCC”). In exchange, RCBO will receive pledges from CCSS and RCC totaling
3 \$8,750,000. Of this amount, \$3.95 million will be immediately available, and an additional \$1.95 million
4 will be received over the first year. In response, the Committee sought extensive discovery and adamantly
5 opposed the Debtor’s request for approval of a transaction bringing in millions of needed dollars.
6 Following a hearing on September 9, 2025, the Court granted the CCSS Divestment Motion.

7 In light of the Debtor’s urgent need to begin monetizing available real property to pay
8 administrative expenses, and the complexities of maximizing value for the Debtor’s unique real property
9 holdings, it was necessary for the Debtor to retain a real estate consultant to advise on strategy and
10 approach and otherwise assist in maximizing recovery from real property. The Debtor therefore retained
11 CU Advisory Corporation (“Century Urban”) to provide real estate consulting services to assist the Debtor
12 in maximizing value from real estate it has identified for sale, in both the short and long term. This was
13 essential for both desperately needed short-term liquidity, and long-term funding of any plan. Because
14 Century Urban will not be involved in the bankruptcy reorganization, the Debtor sought to retain Century
15 Urban as an ordinary course professional (“OCP”) [Docket No. 2220]. The Committee objected to Century
16 Urban’s employment as an OCP [Docket No. 2235]. The Debtor reached agreement with the Committee
17 on an order providing for retention of Century Urban under Bankruptcy Code section 328 [Docket No.
18 2335]

19 In light of the extension of the Plan confirmation process beyond the Debtor’s targeted exit of two
20 years following the Petition Date, together with the escalating professional fee costs driven by the
21 Committee’s litigation approach, on April 23, 2025, the Debtor filed its *Debtor’s Motion to Amend Order*
22 *Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*
23 [Docket No. 1908] (the “Motion to Amend Compensation Procedures”). By the Motion to Amend
24 Compensation Procedures, the Debtor sought an amendment providing for an increase holdback amount,
25 and a preservation of the holdback through the case conclusion: relief that the Debtor determined to be
26 necessary in its business judgment in light of serious liquidity concerns. The Committee opposed this
27 request, and ultimately, as the Court is aware, the parties reached agreement on a compromise at the
28

1 hearing held on June 2, 2025, as reflected in the Court's order entered on June 27, 2025 (the "Order
2 Amending Compensation Procedures").¹⁶

3 In addition to the foregoing, it was necessary for the Debtor to address the following filings and
4 other matters during the Interim Fee Period:

- 5 • The *Notice of Data Security Incident* [Docket No. 1933], filed by the Committee's
6 financial advisor Berkeley Research Group on April 29, 2025, disclosing a major
7 data security incident potentially affecting information of the Debtor. It was
8 ultimately determined after investigation by BRG that none of the Debtor's
9 information was lost.
- 10 • The Committee's applications to retain expert witnesses, including Jennifer
11 Haselberger [Docket No. 1958], Jeffrey Stempel [Docket No. 1963], Jonathan
12 Lipson [Docket No. 1966], and Robin Klomprens [Docket No. 1974]. Based on
13 the unnecessary nature of a number of these retentions, the Debtor raised potential
14 objections with the Committee, leading to the withdrawal of the Lipson and
15 Stempel applications.
- 16 • The Debtor's *Application for Order Authorizing Employment of National
17 Economic Research Associates, Inc. as an Expert Witness Pursuant to 11 U.S.C. §
18 327* [Docket No. 2035], seeking employment of the Debtor's expert witness
19 regarding diocesan settlements.
- 20 • The *Declaration of Andres A. Estrada with Respect to Solicitation and the
21 Tabulation of Votes on the Debtor's Third Amended Plan of Reorganization*
22 [Docket No. 2040], reflecting tabulation of votes on the Plan. As set forth therein,
23 while Class 4 (abuse claims) voted against the Plan, two impaired classes (Class 3
24 and Class 6) voted in favor of the Plan.
- 25 • The *Periodic Report Regarding Value, Operations, and Profitability of Entities in
26 Which the Debtor's Estate Holds a Substantial or Controlling Interest as of
27 December 31, 2024* [Docket No. 2042] regarding the Debtor's interest in Furrer
28 Properties, Inc.
- The *Official Committee of Unsecured Creditors' Memorandum of Law Regarding
Rule 30(b)(6) Deposition* [Docket No. 2047] and the *Debtor's Post Hearing
Statement* [Docket No. 2048], both regarding a dispute regarding the Debtor's
30(b)(6) deposition of the Committee and the Committee's stated intent to
designate its counsel.
- The sixth round of interim fee applications for estate professionals were filed on
June 16, 2025, and came before the Court for hearing on August 13, 2025.

26 ¹⁶ Based on Order Amending Compensation Procedures, the 20% holdback amounts on the monthly fee
27 statements for the prior interim fee period were not paid on approval of the prior round of fee applications.
28 Consistent with the Order Amending Compensation Procedures, Foley is seeking payment of the holdback for the
prior interim period in connection with this Application and anticipates that other professionals will do the same.

- The *Debtor's Third Motion for Order Approving Insurance Premium Finance and Security Agreement and Granting Post-Petition Security Interest* [Docket No. 2123], by which the Debtor sought approval of a further premium finance agreement for its renewed insurance policies.
- The *Notice of Motion and Motion to Allow Filing of Late Proofs of Claim* [Docket No. 1865], filed by claimants Jane Doe P.C. and John Doe N.G., seeking to excuse a late-filed claim. While the Debtor had not opposed similar prior motions, the Debtor did believe it was in the best interests of the estate to file a limited opposition under the circumstances of this motion and the need for finality [Docket No. 2191].
- The *Official Committee of Unsecured Creditors' Motion for an Order Enforcing the Interim Compensation Order* [Docket No. 2132], which was filed in response to the Debtor's objection to certain fees of the Committee's counsel. Following discussion with the Court, the Debtor and the Committee both withdrew their respective objections to monthly fee statements, reserving all rights regarding future fee applications.
- The *Official Committee of Unsecured Creditors' (I) Objection to Proposed Postpetition Payment to Catholic Cathedral Corporation of the East Bay and (II) Request for an Emergency Hearing* [Docket No. 2135], by which the Committee objected to the Debtor's routine payment of operating expenses to CCCEB. The Debtor filed a reply [Docket No. 2144], and the Court overruled the Committee's objection.
- The *Letter to Court by Todd C. Jacobs re: Westport's Request That Your Honor Participate in Mediation* [Docket No. 2174], requesting the Court's participation in mediation, and the Committee's *Letter to the Court by Jeffrey D. Prol re: Response of the Official Committee of Unsecured Creditors to Westport Insurance Corporation's Letter to the Court Dated July 30, 2025* [Docket No. 2182] in response. The Debtor also filed its own letter in response [Docket No. 2199].
- The notice of appeal filed by four Insurers appealing the Court's order granting the Committee's Renewed Lift Stay Motion [Docket Nos. 2201, 2202, 2203, and 2207].
- The *Periodic Report Regarding Value, Operations, and Profitability of Entities in Which the Debtor's Estate Holds a Substantial or Controlling Interest as of June 30, 2025* [Docket No. 2233] regarding Catholic Telemedia Network.

8. Compliance with Bankruptcy Obligations

Since the Petition Date, the Debtor has operated its business as a debtor in possession. During the Interim Fee Period, the Debtor timely filed all required *Monthly Operating Reports* [Docket Nos. 2091, 2156, 2243, and 2336] and two reports pursuant to Bankruptcy Rule 2015.3 regarding the value, operations, and profitability of Furrer Properties, Inc. [Docket No. 2042] and the Debtor's interest in Catholic Telemedia Network [Docket No. 2233]. The Debtor has also paid all required quarterly fees to

the US Trustee to date and has timely filed its reports regarding compensation paid to Ordinary Course Professionals.

III. SERVICES RENDERED¹⁷

In accordance with the *United States Bankruptcy Court Northern District of California Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees* (the “Northern District Guidelines”) and the Local Bankruptcy Rules for the Northern District of California (the “Local Rules”), Foley has attempted to place the services performed in the category that best relates to the service provided. However, because certain services affected multiple categories, services pertaining to one category may occasionally be included in another category. The fact that similar services appear in several different categories did not result in any duplication of work or billing. Further, given the size and complexity of this case, Foley submits that limiting each category to \$20,000 is not practicable.

During the Interim Fee Period, there were instances where more than one attorney from Foley participated in meetings, hearings, or other matters. Sometimes, this participation was for less than the full meeting or hearing, for efficiency. In the Debtor and Foley’s opinion, the complex nature of the case requires different attorneys within Foley to work on different work streams, each focused on particular issues and matters, but together contributing to the overall case strategy. As a result, Foley believes it was appropriate to keep multiple attorneys familiar with these matters in order to more efficiently render services and provide the most effective representation to the Debtor. In the Debtor and Foley’s opinion, this did not lead to duplicative or unnecessary services for the Debtor.

Foley has established the following billing categories in this case to date:

001 – Administrative Expense Claims
002 – Asset Sales/ 363 Sales
003 – Automatic Stay
004 – Bankruptcy Litigation/Adversary Proceedings
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues
006 – Case Administration (Docket Updates, WIP and calendar)

¹⁷ The totals listed in this section for each category do not reflect the discount for *de minimis* timekeepers which is included in the total fees requested.

007 – Chapter 11 Plan/Plan Confirmation	
008 – Communications with Client	
009 – Corporate Governance and Board Issues	
010 – Vendor Issues	
011 – Cash Management	
012 – Disclosure Statement	
013 – Employee Issues	
014 – Exclusivity	
015 – Executory Contracts/Lease Issues	
016 – General Case Strategy (includes calls with client and team calls)	
017 – Hearings and Courts Matters	
018 – Non-Bankruptcy Litigation	
019 – Reserved	
020 – Retention/Billing/Fee Applications for Debtor Professionals	
021 – Retention/Fee Applications: Ordinary Course Professionals	
022 – Retention/Fee Applications: Other Professionals	
023 – Schedules/Statement of Financial Affairs	
024 – Tax Issues	
025 – U.S. Trustee Issues/Meetings/Communications/Monthly Operating Report	
026 – Unsecured Creditors Issues/Communications/Meetings	
027 – Real Estate and Real Property Issues	
028 – Tort Claims	
029 – Non-Tort Proofs of Claim	
030 – Insurance Issues (other than coverage)	
031 – Insurance Issues (coverage)	
032 – Rule 2004 Motions/Discovery/Subpoenas	
033 – First Day Motion Practice	
034 – Other Motion Practice	
035 – General Counsel Matters	
036 – Secured Creditor Matters	
037 – Financing	
038 – Mediation	

Exhibit G includes Foley's invoices for the Interim Fee Period, which includes a detailed breakdown of the time entries and expenses incurred, by task category.

Foley has agreed that it will not charge the Debtor for the travel time undertaken by its attorneys and other professionals. During the Interim Fee Period, Foley incurred, but did not charge the Debtor for, 75.6 hours of travel time, totaling \$69,000.00 in fees not charged to the Debtor.

1 **A. Asset Sales / 363 Sales (002)**

2 **Total Hours 38.10/Total Fees \$35,177.50**

3 During the Interim Fee Period, Foley, among other things, Foley attorneys researched and analyzed
4 the potential value which could be obtained in a transaction to release the Debtor's interests in Catholic
5 Church Support Services, Inc. ("CCSS") in exchange for certain compensation. Foley attorneys drafted a
6 motion and related documents to accomplish this divestment of the Debtor's interest (the "CCSS
7 Motion"). They also responded to the Committee's objection to the CCSS Motion, and provided due
8 diligence information the Committee. The Court granted the CCSS Motion after the end of this Interim
9 Fee Period, on September 18, 2025 [Dkt. No. 2323].

10 **B. Automatic Stay (003)**

11 **Total Hours 51.30/Total Fees \$45,269.00**

12 During the Interim Fee Period, Foley, among other things, Foley analyzed the Committee's
13 Renewed Lift Stay Motion to allow six undetermined personal injury cases to move forward to resolution
14 in state court, purportedly to help establish data points for the resolution of other claims. Foley prepared
15 its Objection to the Renewed Lift Stay Motion, and represented the Debtor in the hearing on it. Ultimately,
16 the Court granted the Renewed Lift Stay Motion. Once it was granted, Foley attorneys worked with the
17 Committee's attorneys and other parties in interest to determine the most appropriate cases to move
18 forward, and to evaluate the impact of the order on co-defendants. In addition, certain of the Debtor's
19 insurers appealed the order granting the Renewed Lift Stay Motion, and Foley reviewed the appeal
20 documents and appeared at a status conference in the District Court regarding the appeal.

21 **C. Bankruptcy Litigation/Adversary Proceedings (004)**

22 **Total Hours 176.90/Total Fees \$143,144.50**

23 This task code includes Foley's time in addressing litigation and contested matters in the Chapter
24 11 Case. Most of this time was incurred in addressing and responding to the barrage of litigation brought
25 by the Committee in response to filing of the Original Plan. During the Interim Fee Period, this primarily
26 related to the Committee Adversary Proceedings. As set forth above, time related to the Renewed Lift
27 Stay Motion is categorized in task code 003.

1 The majority of Foley's time incurred during the Interim Fee Period in this category was spent
2 litigation related to the Committee Adversary Proceedings following the Committee's amended
3 complaints filed on April 30 and May 6, 2025. Specifically, Foley researched the issues raised by the
4 amended complaints in both Committee Adversary Proceedings, analyzed the factual circumstances and
5 prepared renewed motions to dismiss both cases. Foley also prepared replies in support of both Motions
6 to Dismiss in response to the Committee's objections to the Motions. Foley also prepared for the hearings
7 on these motions. Ultimately, on following a hearing on June 4, 2025, the Court granted the Substantive
8 Consolidation Motion to Dismiss, and dismissed the Adversary Proceeding against the Debtor, RCC,
9 RCWC, and Adventus with prejudice. The Committee filed a motion to reconsider, as well as appealing.
10 The Motion to reconsider was argument on September 9, 2025, but the Court has not yet ruled. The Court
11 denied the Restricted Assets Motion to Dismiss, and the Debtor subsequently answered. More detail
12 regarding the Adversary Proceedings can be found in Section II.C.3.A, *infra*. The majority of time spend
13 in this category was in litigating the motions to dismiss.

14 Also during the Interim Fee Period, Foley expended additional time and effort following its answer
15 to the First Adversary Proceeding regarding restricted assets, in connection with the initial phases of
16 discovery. This work included preparing initial disclosures and written discovery, as well as responding
17 to the Committee's writing discovery.

18 **D. Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues (005)**

19 **Total Hours 15.50/Total Fees \$12,208.50**

20 During the Interim Fee Period, Foley's professionals Foley addressed a new motion to permit
21 additional late-filed claims and considered its response to that motion. It also undertook negotiations with
22 Committee counsel and other interested parties regarding the motion and reviewed the objection filed by
23 certain Insurers. Foley also continued its review of the claims that had been filed and potential objections
24 to such claims.

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

Total Hours 54.30/Total Fees \$21,441.50

During the Interim Fee Period, Foley, among other things, worked on (i) general case administration such as reviewing and calendaring matters before the Court, including maintenance of Foley's Master Case Calendar and timeline; (ii) preparing updates regarding filed documents to timely inform the entire case team of new issues; (iii) preparing a detailed calendar and timeline for the Plan confirmation process; (iv) prepared materials needed for hearings and filings; and (v) updating and maintaining the Core Service List. Foley uses attorneys to conduct its reviews of pleadings and calendaring matters given the critical nature of these items. However, to be mindful of costs, Foley primarily staffs an associate attorney and a paralegal on these matters with limited review by a partner.

F. Chapter 11 Plan/Plan Confirmation (007)

Total Hours 432.80/Total Fees \$409,003.00

During the Interim Fee Period, Foley, among other things, Foley professionals continued to work on matters related to confirmation of the Plan. In particular, during the Interim Fee Period, Foley undertook extensive expert discovery, including reviewing and working with the Debtor's five experts on their reports. Foley professionals also analyzed the reports provided by the Committee's retained experts. In addition, Foley and the Committee took fact witness depositions during the Interim Fee Period, which required significant preparation and work with the Debtor's fact witnesses in advance of their depositions.

In addition, during the Interim Fee Period, Foley conducted research on various Plan confirmation issues, included classification of claims and interests, creation of a reserve for unknown claims, restricted assets, potential modifications to the Plan and undertook research regarding the objections asserted by the Committee and other parties. Foley also analyzed voting reports provided by Verita, addressed issues related to the solicitation process, and drafted documents regarding tabulation of the votes and the solicitation process. Foley also worked on discovery issues related to confirmation, however additional details about the confirmation discovery process are also included in task code 032 below. Further details regarding Foley's work on the Plan during the Interim Fee Period are included at Section II.C. *infra*.

1 **G. Communications with Client (008)**

2 **Total Hours 125.80/Total Fees \$121,142.50**

3 During the Interim Fee Period, Foley, among other things, (i) held in-person and telephone or
4 video conference meetings with certain of the Debtor's leadership and employees on all matters related to
5 the Bankruptcy Case and its administration, including both scheduled and *ad hoc* meetings as case
6 circumstances dictated; and (ii) undertook email and other written communications with the Debtor's
7 leadership and employees on all matters related to the Bankruptcy Case and its administration, including
8 regular case status emails to keep the Debtor team updated on developments and deadlines in the
9 Bankruptcy Case. Specifically, during this Interim Fee Period, the Debtor addressed certain privileged
10 matters with the Debtor's leadership, spent considerable time with the Debtor and its other professionals
11 regarding discovery and depositions for the confirmation process, worked on responses to the
12 Committee's various filings, reviewed issues related to the valuation of the Debtor's real estate and other
13 assets, analyzed funding and cash flow issues with the Debtor and its professionals, conferred regarding
14 confidential mediation matters, and extensively strategized as to the potential options to resolve the
15 Chapter 11 Case, including analyzing whether there was a potential path to a consensual settlement.
16 General strategy meetings and communications are captured in this task code, while specific tasks related
17 to particular matters may be found in those codes.

18 **H. Corporate Governance and Board Issues (009)**

19 **Total Hours 8.30/Total Fees \$8,343.00**

20 During the Interim Fee Period, Foley, among other things, (i) prepared information for the Debtor
21 to use in the Stonebridge audit; and (ii) worked on matters related to the MDRB bylaws and related
22 documents.

23 **I. Cash Management (011)**

24 **Total Hours 48.70/Total Fees \$45,765.00**

25 During the Interim Fee Period, Foley addressed numerous matters relating to the Debtor's cash
26 management, including, among other things, (i) analyzing certain of the Debtor's donor gifts, grants and
27 bequests; (ii) addressing issues regarding the Debtor's quarterly payments to CCCEB for use of the
28

Cathedral property and central services offices, and providing notice to the Committee and US Trustee regarding the same; (iii) responding to the Committee's objection to the CCCEB quarterly payment; (iv) work on the Debtor's cash flow forecast and cash management issues, including complications related to increased administrative expenses; and (v) reviewing cash flow and related financial matters with respect to Plan funding. Foley also continued to review and analyze issues related to restricted gifts and restricted cash holdings, including as to church restricted cash, and substantiation and documentation of restricted funds.

J. General Case Strategy (includes teams calls) (016)

Total Hours 247.90/Total Fees \$221,235.50

This task code includes Foley's time incurred on both essential communications among the Debtor's restructuring team and professionals, and work on case strategy and planning. In connection with communications, Foley, among other things, (i) held internal team coordination calls only when needed to ensure the core group of attorneys working on the case were up to date on all case matters and could coordinate the various work streams; and (ii) held meetings only as necessary with the Debtor's other professionals (*e.g.*, A&M, Vera Cruz, and the communications team) to align on various issues in the case. This time also includes communications between various Foley team members as necessary to coordinate on various work streams and projects, including primarily the Plan and Disclosure Statement during this Interim Fee Period. For ease of analysis, the internal communications, and meetings within Foley and between Foley and other Debtor professionals are generally included in this task code, unless they related to a specific issue included in another task code. In some cases, professionals attended and billed for only a portion of a meeting.

In connection with case strategy and planning, Foley researched and strategized regarding issues including: (i) privileged issues related to internal matters at the Debtor; (ii) research and strategize regarding issues related to plan confirmation discovery; (iii) review of restricted asset matters; (iv) review of administrative expense concerns; (v) work on an adjournment of the confirmation process; (vi) analysis of potential case resolution options; (vii) research related to privileged matters concerning religious freedom issues; (viii) analysis of the impact of California's Proposition 51 on the case; and (ix) evaluation

of other diocesan cases and their current status in order to evaluate any aspect of settlements of certain cases that could assist the Debtor in this case.

K. Hearings and Court Matters (017)

Total Hours 103.10/Total Fees \$94,352.00

During the Interim Fee Period, Foley extensively prepared for and represented RCBO at hearings including (i) the May 13, 2025 status conference and hearing regarding discovery disputes including Motions to Quash, the BRG data breach, and one of the late-filed claims motions; (ii) a hearing on June 4, 2025 to address motions to dismiss the Committee's Adversary Proceedings ; (iii) a hearing on June 13, 2025 regarding further discovery matters; (iv) a lengthy hearing on July 16, 2025 to address the Committee's Renewed Lift Stay Motion, the Debtor's Motion for Insurance Premium Financing; the Committee's objection to the CCCEB payment, the Debtor's objection to the fees of Lowenstein Sandler LLP, and other matters (v) a July 18, 2025 hearing regarding adjourning the Plan confirmation process; (vi) an August 8, 2025 status conference on various matters; and (v) a further status conference on August 13, 2025. For each of these hearings, Foley only billed time for its attorneys where Foley believes they were necessary and actively supported the Debtor's position at the hearing or were present to provide support to the attorneys arguing the matters before the Court. In some cases, additional Foley attorneys were present at a hearing but did not bill their time for the hearing.

L. Non-Bankruptcy Litigation (018)

Total Hours 40.70/Total Fees \$38,595.00

Time in this task code relates primarily to the JCCP 5108 Superior Court coordinated proceedings, as they relate to bankruptcy issues. Foley (i) drafted reports for and attended case management conferences on May 28, 2025 and August 26, 2025, in JCCP 5108 in order to monitor matters that could potentially affect the automatic stay or the Bankruptcy Case, and to address bankruptcy issues arising in the case management conferences; (ii) reviewed issues related to the litigation pending in state court, including discovery matters and motions in limine; (iii) researched and analyzed issues related to the automatic stay in light of cases proceeding to trial after the Court granted the Renewed Lift Stay Motion; (iv) communicated with counsel for other parties, including co-defendants, and participated in meet and confer

calls particularly with respect to Court's Order granting the Renewed Lift Stay Motion and the need to determine which cases would proceed to trial; and (v) analyzing the ruling by Judge Chatterjee in the JCCP 5108 matter on the impact of Proposition 51 on the cases.

M. Non-Working Travel (019)

Total Hours 7.30/Total Fees \$3,193.75

During the Interim Fee Period, one Foley attorney travelled to Eugene Oregon for the deposition of Judge Hogan, the Unknown Claims Representative. This time is billed at 50%.

N. Retention/Billing/Fee Applications for Debtor Professionals (020)

Total Hours 128.40/Total Fees \$102,541.50

During the Interim Fee Period, Foley, among other things, (i) prepared its monthly fee statements for April 2025 – July 2025; (ii) prepared Foley's Sixth Interim Fee Application; (iii) assisted the Debtor's other professionals with their fee statements and Interim Fee Applications; (iv) further drafting of motion to modify the Interim Compensation Procedures, litigating the matter with the Committee, and ultimately negotiating a resolution to reduce the monthly holdback amount in order to assist the Debtor in managing its cash flow; (v) analyze potential retention under 327 for real estate professionals; and (vi) preparing the application to retain National Economic Research Associates ("NERA") as an expert witness. Foley attorneys also discussed the Fifth Interim Fee Application with the Fee Examiner, attended the hearing on the Interim Fee Applications, and prepared an omnibus order for all of the approved fees in accordance with the rulings of the Court.

O. Retention/Fee Applications: Ordinary Course Professionals (021)

Total Hours 14.90/Total Fees \$12,477.50

During the Interim Fee Period, Foley addressed necessary issues regarding employment and compensation of ordinary course professionals, including, among other things, (i) preparing an OCP application for Century Urban as a real estate consultation (later changed to a Section 327 application after the Committee objected); (ii) analyzing OCP invoices; (iii) researched issues on payment timing for OCPs as related to the monthly caps; (iv) preparing and filing the Debtor's quarterly report regarding compensation to ordinary course professionals and compliance with the Court's order regarding the

retention of Ordinary Course Professionals [Docket No. 263] (the “OCP Order”); and (v) coordinating with the Debtor regarding payment of ordinary course professionals in compliance with the OCP Order.

P. Retention/Fee Applications: Other Professionals (022)

Total Hours 40.90/Total Fees \$31,872.00

During the Interim Fee Period, Foley, among other things, (i) reviewed issues related to the compensation and monthly fee statements of professionals retained by the Committee; (ii) prepared and litigated an objection to Lowenstein Sandler’s fees for May 2025; (iii) provided information and assistance to the Court-appointed mediators with respect to the filing of their interim fee applications for the period of January - April 2025; (iii) analyzed the applications of various Committee experts, including potential objections to same; and (iv) worked with the Debtor to ensure payment of amounts owed for monthly fee statements and Interim Fee Orders.

Q. Schedules / Statement of Financial Affairs (023)

Total Hours 1.20/Total Fees \$1,095.00

During the Interim Fee Period, Foley, among other things, reviewed and analyzed the potential need for amendments to the Debtor’s Schedules of Liabilities.

R. U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Report (025)

Total Hours 11.20/Total Fees \$8,775.00

During the Interim Fee Period, Foley, among other things, assisted the Debtor with final review and filing of monthly operating reports (“MORs”) and analyzing the quarterly US Trustee fee payments required. In order to minimize professional fee expenses, Foley’s work on MORs was largely limited to final review of the MORs and addressing specific questions and issues. In addition, during the Interim Fee Period Foley assisted with the preparation of Rule 2015.3 periodic reports regarding the Debtor’s interest in CTN and Furrer Properties. In addition, Foley analyzed the United States Trustee’s response to filings made regarding the BRG data breach.

1 **S. Unsecured Creditor Issues/Communications/Meetings (026)**

2 **Total Hours 30.20/Total Fees \$27,900.00**

3 This category reflects Foley's time incurred in communications with the Committee's
4 professionals, particularly regarding discovery conducted in connection with Plan confirmation, including
5 expert discovery, coordination of property inspections. Foley also communicated with the Committee's
6 counsel on issues related to the Unknown Claims Representative, and issues related to the Committee's
7 adversary proceedings. This included numerous telephone and video conferences, as well as written
8 communications, with counsel for the Committee on issues of mutual concern such as the ones listed
9 above. In addition to communications with Committee professionals, this task code includes some time
10 incurred by Foley attorneys in coordinating internally and with the Debtor and its professionals regarding
11 responses to the Committee's information requests. Time spent responding to the Committee's motions
12 and adversary proceedings are found in Task Codes 003 (Lift Stay Matters), 004 (Bankruptcy
13 Litigation/Adversary Proceedings), and 007 (Chapter 11 Plan).

14 **T. Real Estate and Real Property Issues (027)**

15 **Total Hours 25.80/Total Fees \$22,892.50**

16 During the Interim Fee Period, much of Foley's time incurred was related to evaluation of real
17 estate assets of the Debtor and the utilization of these assets to support the payments the Debtor would be
18 obligated to make under the Plan. Foley also worked on the necessary documentation of the CCCEB
19 transaction included in the Plan, and other real estate documentation.

20 **U. Tort Claims (028)**

21 **Total Hours 4.50/Total Fees \$3,257.50**

22 This task code captures Foley's time incurred in addressing matters related to state court sexual
23 abuse actions, to the extent the time is not reflected in task code 018, above, as well as other tort claims.
24 During the Interim Fee Period, Foley summarized information on certain claims of parties who were also
25 state court plaintiffs, provided information on other claims for various requests, and reviewed other claims.
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1 **V. Insurance Issues (other than coverage) (030)**

2 **Total Hours 0.30/Total Fees \$277.50**

3 During the Interim Fee Period, Foley's work related to correspondence with insurance counsel on
4 Plan-related matters.

5 **W. Insurance Issues (coverage, incl. adversary proceeding) (031)**

6 **Total Hours 321.00/Total Fees \$282,636.50**

7 During the Interim Fee Period, Foley's focus in the Debtor's coverage litigation in the Insurance
8 Coverage Litigation turned principally to progressing written discovery. In addition, Foley worked with
9 the Insurers and mediators through the mediation process to discuss the possibility of insurer settlement
10 contributions to the Debtor's proposed Plan of Reorganization in the Bankruptcy, and otherwise
11 coordinated between Foley insurance and bankruptcy counsel regarding bankruptcy matters with
12 insurance components. The Debtor's insurance coverage for abuse claims is one of the largest assets
13 available to compensate claimants. Aggressively pursuing insurance coverage, whether through
14 settlement, full assignment of RCBO's insurance asset through the Plan, or the Insurance Coverage
15 Litigation, is essential to preserving and maximizing this asset for the benefit of RCBO's estate and the
16 claimants.

17 **I. Continuing Discovery Process**

18 On January 17, 2025, the District Court granted the Debtor's Motion to Hold Cases in Abeyance
19 in part, directing the parties to proceed with all written discovery they believe is needed for the Insurance
20 Coverage Litigation. This task code therefore includes Foley's time spent progressing document and
21 written discovery. This included first-level and supervisory document review and production; partner-
22 level analysis of any related strategy, privilege, or confidentiality issues; time spent finalizing and serving
23 document productions on insurers; and preparation of a privilege log of documents withheld from RCBO's
24 document productions to date. In addition, this task code includes Foley's time spent investigating and
25 conducting internal strategy meetings regarding insurer inquiries and allegations of deficiencies in
26 RCBO's document productions, as well as drafting responses to such inquiries and allegations. Foley also
27 spent considerable time drafting and revising the July 29, 2025 Joint Status Update regarding discovery
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as ordered by Judge Corley, including multiple emails, conference calls, and proposed revisions exchanged with insurers regarding the same. Foley likewise spent time on procedural and logistical coordinating with the Debtor's separate counsel for the related matter against specific insurers (Breall & Breall). Finally, during this Interim Fee Period, Foley prepared for the August 20, 2025 Case Management Conference before the District Court, which included internal meetings and analysis of discovery issues and subjects in the Bankruptcy case touching on insurance issues.

2. Further Mediation Efforts

During this Interim Fee Period the parties continued their efforts and discussions related to potential settlement with certain insurers in the form of contributions to the Debtor's Plan of Reorganization. This task code therefore reflects Foley's time spent in discussions with the mediators and insurer representatives as part of this effort. In addition, Foley spent time drafting reports to the client regarding the status of mediation efforts, as well as on analysis of claims attributed to insurers and potential settlement value. Finally, Foley crafted a final settlement proposal to the Committee and the insurers, which involved internal strategy discussions and drafting of the same. Much of the work related to the mediation process, including work specifically related to the insurance mediation, is also categorized in the mediation task code (038).

3. Miscellaneous Matters included in Task Code

This task code reflects other insurance-related work by Foley during the Interim Fee Period that touched on concurrent issues in the Bankruptcy Case including, principally, work related to Judge Lafferty's July 25, 2025 Order granting the Committee's motion to lift the automatic stay on six state court cases (the "Lift Stay Order"). In connection with the Lift Stay Order, Foley spent time communicating with the insurers regarding the same, analyzing certain insurers' appeal of the Lift Stay Order, and analyzing state court cases proposed for stay relief to confirm full insurance coverage for those cases and address any coverage issues with Committee counsel. Foley also spent time communicating with insurers to confirm they would provide RCBO a defense against any selected state court cases, analyzing issues related to RCBO's right to secure independent counsel alongside insurer-assigned defense counsel, communicating with insurer-assigned defense counsel, and advising the client regarding

the same. Other areas of insurance-related work supporting the Bankruptcy in this Interim Fee Period included (i) analysis of proposed language for confirmation order regarding insurance coverage for non-abuse litigation; (ii) analysis of insurance coverage under RCBO's insurance policies for non-RCBO entities such as RCWC; (iii) and securing an insurance premium financing agreement, including coordination with the client and RCBO's insurance broker and drafting a motion for Bankruptcy Court approval of the agreement, which was ultimately granted by the Court.

X. Rule 2004 Motions/Discovery/Subpoenas (032)

Total Hours 1,294.70/Total Fees \$982,609.50

During the Interim Fee Period, Foley's work related primarily to discovery issues in the confirmation process, which are described in more detail below. Once the Court approved solicitation of the Third Amended Plan in April 2025, Foley began extensive work on confirmation discovery matters, which are contained in this task code. This included the continuation of the discovery process that begun in April.

Foley incurred the majority of the time in this task Code for the Interim Fee Period responding to the discovery propounded by the Committee. The Committee served 98 Requests for Production of Documents and 19 Interrogatories (the "Committee Discovery Requests") on the Debtor, the responses to which required a significant amount of consultation between Foley and the Debtor in order to ensure complete and timely responses, including meetings and correspondence with the Debtor's IT department in order to ensure collection of responsive documents. These efforts resulted in the collection of over 400,000 emails and other documents, which had to be reviewed, coded, and where appropriate, redacted for privileged issues prior to production to the Committee. Foley also drafted lengthy and detailed responses and objections to the Committee Discovery Requests, as well as an extensive privilege log for the productions. Foley also developed search terms, analyzed and applied appropriate confidentiality designations for documents produced to the Committee. Foley also worked on court pleadings related to Committee's Motion for a Protective Order, and attended a hearing on that dispute.

The Committee also sent approximately 85 subpoenas to the priests at each parish within the Diocese. Foley reviewed the subpoenas and determined that it was appropriate to file a motion to quash

all of them, which it prepared and filed. The Court ultimately granted the motion in the Interim Fee Period. However, in order to ensure that a complete search for responsive documents was made, Foley also assembled a team of associate attorneys to interview each parish priest to determine if any responsive documents existed at the parish level that had not already been provided to the Diocese office. A small number of documents were obtained, reviewed, and produced to the Committee, however in most cases, Foley was able to confirm that RCBO had the information required to respond to the Committee Discovery Requests.

In addition to the foregoing, during the Interim Fee Period, Foley also communicated with Committee counsel on various discovery issues, scheduling depositions, including matters related to Rule 30(b)(6) depositions, and the responses the Debtor had provided to the Committee Discovery Requests. Foley also worked with Vera Cruz to assist in its document production in response to a subpoena from the Committee, reviewed documents to prepare for depositions of RCBO personnel, and completed supplemental productions to the Committee as requested.

Y. Other Motion Practice (034)

Total Hours 16.70/Total Fees \$11,722.00

During the Interim Fee Period, Foley addressed various litigation matters including preparing a motion to further extend the deadline to remove causes of action, and undertook further work on a motion to dismiss the case as an alternative resolution if needed due to the continuing and accelerating cash burn resulting from the Committee's litigation tactics. In addition, Foley prepared a motion to extend lease assumption deadlines in the case.

Z. General Counsel Matters (035)

Total Hours 18.90/Total Fees \$17,868.00

The Debtor does not have an in-house attorney or general counsel. Rather, Foley serves as outside general counsel for the Debtor and has done so for over a decade, resulting in the efficient delivery of legal services to the Debtor to address a number of day-to-day operational issues. During the Interim Fee Period, Foley, among other things, assisted the Debtor with certain construction projects and the related

contracts, as well as advising the clients on certain policies for the Debtor going forward, and drafted bylaws for internal groups.

AA. Financing (037)

Total Hours 19.10/Total Fees \$17,247.50

During the Interim Fee Period, Foley continued negotiations with the Debtor's secured creditor on the terms of possible exit financing in the event the Plan is confirmed, and researched the most appropriate terms for the transaction. In addition, Foley worked with the Debtor to further analyze what types of property could be used as collateral for the financing and to repay the loan, and the value of such collateral, including working with outside real estate professionals, review of appraisals and other information about the properties. Foley also began to draft loan documents for the transaction including the credit agreement.

BB. Mediation (038)

Total Hours 12.10/Total Fees \$11,435.50

During the Interim Fee Period, the Debtor and Foley continued to work with the Insurance Mediators and the Insurers to continue to negotiate for a potential settlement. This included a number of calls and communications with the Insurance Mediators and the evaluation of settlement considerations.

IV. REIMBURSEMENT OF EXPENSES

A. List of Expenses by Category

Foley advanced costs, including certain in-house charges, in connection with the performance of the services described in this Interim Application. During the Interim Fee Period, Foley incurred and billed the Debtor a total of \$61,501.03 in expenses. As this modest amount reflects, Foley made every effort to keep the costs in this case to a minimum. Additionally, as noted above, Foley agreed that it would not charge the Debtor for any travel expenses for its attorneys to travel to the Bay Area, including airfare, meals, and hotels. During the Interim Fee Period, Foley wrote off the sum of \$27,138.15 for such travel expenses. Foley absorbed these costs itself. A summary chart detailing the type and amount of expenses incurred during the Interim Fee Period is attached hereto as **Exhibit E**.

Foley does not charge for photocopying expenses, print jobs, or scanned copies. However, it might sometimes be necessary for Foley to send large copying projects to an outside copy service that charges a

1 reduced rate for photocopying. Foley also hosts a litigation support platform for the Debtor in relation to
2 the previously-filed state court abuse litigation which is being utilized in this case also. Charges for hosting
3 that platform are included in this application.

4 Regarding providers of on-line legal research, Foley charges the standard usage rates these
5 providers charge for computerized legal research. Foley bills its clients the actual amount charged by such
6 services, with no premium. Any volume discount received by Foley is passed on to the client. Foley does
7 not charge for local or long distance calls placed by attorneys from their offices. Foley only bills its clients
8 for the actual costs charged to Foley by teleconferencing services in the event that a multiple-party
9 teleconference is initiated through Foley.

10 **V. COMPLIANCE WITH GUIDELINES**

11 **A. Hourly Rates**

12 The hourly rates of all professionals and paraprofessionals rendering services in this case are set
13 forth on the Billing Summary Chart on **Exhibit C** annexed hereto. As noted in Foley's retention
14 application and other documents, Foley's rates increase annually on February 1 of each year.

15 **B. Client Review of Billing Statements**

16 Pursuant to the Northern District Guidelines, an email enclosing this Interim Application is being
17 sent to the Debtor concurrently with its filing. This email will include the language required by the
18 Guidelines, inviting the Debtor to discuss with the Firm and/or the US Trustee any objections, concerns,
19 or questions the Debtor may have with regard to the requested compensation and reimbursement set forth
20 in the Interim Application.

21 **C. Notice of Application and Hearing**

22 Notice of this Interim Application and the hearing thereon will be provided to the US Trustee, the
23 Debtor, all parties requesting special notice and other interested parties in accordance with the Bankruptcy
24 Rules, Local Bankruptcy Rules, and any applicable orders of the Court. Complete copies of the Interim
25 Application will be promptly furnished to any other party upon specific request. Therefore, notice should
26 be deemed adequate under the circumstances and in accordance with Federal Bankruptcy Rules 2002(a)(6)
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and 2002(c)(2). Additionally, this Interim Application is available from the claims and noticing agent, KCC, at no charge.

D. No Agreements to Share Compensation

Neither Foley, nor any partners or associates of the Firm, have any agreement or any understanding of any kind or nature to divide, pay over, or share any portion of the fees to be awarded Foley with any other person or attorney, except among members of the Firm.

E. Other Compliance with Large Case Requirements

Attached as **Exhibit B** through **Exhibit F** are the exhibits that Foley understands need to be completed and filed together with this Interim Application in order to comply with the Large Case Guidelines. In addition, pursuant to paragraph C.5 of the Large Case Guidelines, Foley provides the following statements:

INQUIRY	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?	Yes
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.	Yes, Foley attorneys billed 23.8 hours of time on these tasks during the Interim Fee Period, with fees of \$19,687.50.

INQUIRY	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, Foley attorneys billed zero hours of time on these tasks, with fees of \$0.00.
If the fee application includes any rate increases since retention: <ul style="list-style-type: none"> 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? 	Yes, as discussed in Foley's Retention Application, Foley's fees increase annually on February 1.

VI. BASIS FOR ALLOWANCE OF FEES AND EXPENSES

The fees and expenses requested by this Interim Application reflect reasonable compensation for services provided, and reimbursement of necessary expenses incurred, by Foley in acting as general bankruptcy counsel to the Debtor during the Interim Fee Period.

A. The Standard for Allowance of Compensation Pursuant to Section 330(a)

Pursuant to Section 330(a) of the Bankruptcy Code, the Court may award to a professional person reasonable compensation for actual, necessary services rendered, and reimbursement for actual, necessary expenses incurred. Pursuant to Section 331 of the Bankruptcy Code, the Court may award interim compensation and reimbursement to a professional. As set forth above, the fees for which the Firm requests compensation and the costs incurred for which the Firm requests reimbursement are for actual and necessary services rendered and costs incurred.

Section 330(a)(3) provides that in evaluating reasonable compensation, the court should consider the nature, extent, and value of the services provided, taking into account all relevant factors, including, (a) the time spent in providing such services; (b) the rates charged; (c) whether the services were necessary or beneficial to the estate at the time; (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the matter addressed; (e) whether the professional is certified or otherwise has demonstrated skill and experience in the bankruptcy field;

1 and (f) whether the compensation sought is reasonable based on amounts charged by comparably skilled
2 practitioners in non-bankruptcy cases. *See* 11 U.S.C. § 330(a)(3).

3 In determining the amount of allowable fees under Section 330(a) of the Bankruptcy Code, courts
4 are to be guided by the same “general principles” as are to be applied in determining awards under the
5 federal fee-shifting statutes, with “some accommodation to the peculiarities of bankruptcy matters.”
6 *Burgess v. Klenske (In re Manoa Finance Co., Inc.)*, 853 F. 2d 687, 691 (9th Cir. 1988). When determining
7 the amount of reasonable compensation to be awarded, the court shall consider the nature, extent, and
8 value of such services, taking into account all relevant factors, including the factors in Section 330(a)(3).

9 In assessing the propriety of an award of attorneys’ fees, twelve factors relevant to determining
10 such fees were identified in *Johnson v. Georgia Highway Express, Inc.*, 488 F. 2d 714, 717-719 (5th Cir.
11 1974), a Title VII class action case under the Civil Rights Act of 1964, 42 U. S. C. § 2000 et seq., and
12 *Kerr v. Screen Extras Guild, Inc.*, 526 F. 2d 67, 70 (9th Cir. 1975), *cert. denied*, 425 U. S. 951 (1976): (1)
13 the time and labor required, (2) the novelty and difficulty of the questions, (3) the skill requisite to perform
14 the service properly, (4) the preclusion of other employment by the professional due to acceptance of the
15 case, (5) the customary fee, (6) whether fee is fixed or contingent, (7) time limitations imposed by the
16 client or the circumstances, (8) the amount involved and the results obtained, (9) the experience,
17 reputation, and ability of the professionals, (10) the undesirability of the case, (11) the nature and length
18 of the professional relationship with the client, and (12) awards in similar cases. *See American Benefit*
19 *Life Ins. Co. v. Baddock (In re First Colonial Corp. of America)*, 544 F.2d 1291 (5th Cir. 1977) (*Johnson*
20 *criteria applicable in bankruptcy cases*).

21 **B. Foley’s Work as Described in this Interim Application Satisfies the Requirements of**
22 **Section 330, and the Request for Compensation Should Be Granted**

23 The time for which compensation is sought is detailed in the Firm’s invoices for the Interim Fee
24 Period annexed hereto as **Exhibit G**. Foley’s services and time expenditures are reasonable in light of the
25 labor required and outcomes achieved to date in this Chapter 11 Case. The Firm’s charges for its
26 professional services are based upon the time, nature, extent, and value of such services and the cost of
27 comparable services in the San Francisco area, other than in a case under the Bankruptcy Code. The
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1 compensation the Firm seeks by way of this Interim Application is the customary compensation
2 commonly sought by the Firm and other professionals representing trustees, committees, and debtors in
3 similar circumstances.

4 Foley believes the facts and complex nature of this case and the substantial progress that has
5 occurred to date including, notably, obtaining Court approval of the Debtor's Third Amended Disclosure
6 Statement and its significant efforts with respect to the pre-confirmation fact and expert discovery process
7 on an expedited basis, as well as its continued efforts to resolve the case with both the Committee and the
8 Insurers, as set forth in detail above, demonstrate that Foley's services were both necessary and beneficial
9 to the estate. Further, Foley believes its attorneys are skilled and have performed well in this case, and
10 that the fees charged by Foley are commensurate with the fees charged by Foley's counterparts engaged
11 in non-bankruptcy specialties of the law.

12 Though Foley has utilized some professionals for fewer than 15 hours during the Interim Fee
13 Period, Foley represents that the use of these professionals was efficient and appropriate under the
14 circumstances because of their expertise needed for discrete issues, and in many cases, their prior work
15 on this case.¹⁸ These professionals often have particular expertise which Foley's bankruptcy attorneys can
16 call upon to review matters quickly without the need for additional research and cost, and their fees should
17 be approved.

18 **C. The Estate Has Sufficient Available Funds**

19 Foley understands that the Debtor has sufficient funds available for the payment of fees and costs
20 requested herein.

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24 ¹⁸ Foley & Lardner LLP is not requesting payment of fees related to six timekeepers due to *de minimis* amounts
25 billed by said timekeepers, resulting in a reduction in requested fees in the amount of \$3,089.50 related to said
26 timekeepers. However, Foley requests payment of fees for the remaining timekeepers who billed fewer than 15
27 hours during the Interim Fee Period, because their expertise is unique and necessary for certain discrete issues in
28 the case (*e.g.*, trusts and estates, constitutional law, labor and employment, real estate, tax matters, financing,
corporate governance, insurance, and bankruptcy matters, as well as assistance with the expedited discovery in
connection with Plan confirmation), including timekeepers who have spent significant time on this case since its
filing in May 2023 or who will be continuing to work on the case in future time periods.

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VII. CONCLUSION

Foley believes that the services rendered for which compensation is sought in this Interim Application have been beneficial to the estate, that the costs incurred have been necessary and proper, and that the sums requested for the services rendered and the costs incurred are fair and reasonable.

WHEREFORE, Foley respectfully requests that the Court (a) authorize interim allowance and direct payment of fees and costs including the amounts held back for Foley's Sixth Interim Fee Application, (b) award interim compensation and reimbursement of expenses to the Firm in the amount of **\$2,803,137.28** inclusive of all fees and costs for the period from May 1, 2025 through August 31, 2025, consisting of **\$2,741,636.25** of fees (reflecting the reduction for certain *de minimis* billings), and **\$61,501.03** of expenses, (c) approve payment of the holdback amounts approved in Foley's Sixth Interim Fee Application, and (d) grant such other and further relief as may be appropriate under the circumstances.

DATED: October 15, 2025

FOLEY & LARDNER LLP

Eileen R. Ridley

Shane J. Moses

Ann Marie Uetz

Matthew D. Lee

Geoffrey S. Goodman

Mark C. Moore

/s/ Shane J. Moses

SHANE J. MOSES

*Counsel for the Debtor
and Debtor in Possession*

EXHIBIT A

FOLEY RETENTION ORDER

JUNE 15, 2023

EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**FOLEY & LARDNER LLP**

Jeffrey R. Blease (CA Bar No. 134933)

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Tel: (312) 832-5156; ekhatchatourian@foley.comAnn Marie Uetz (admitted *pro hac vice*)Tel: (313) 234-7114; auetz@foley.comMatthew D. Lee (admitted *pro hac vice*)Tel: (608) 258-4203; mdlee@foley.com

555 California Street, Suite 1700

San Francisco, CA 94104-1520

The following constitutes the order of the Court.

Signed: June 15, 2023

William J. Lafferty, III
U.S. Bankruptcy Judge*Proposed 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

**ORDER APPROVING 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 & 2016 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE**

Upon the application (the "Application")¹ filed by The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or the "Bankruptcy Case"), pursuant to sections 327(a), 330, 331, and 1107 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016, for entry of an order authorizing the employment and retention of Foley & Lardner LLP ("Foley") to represent the Debtor as general bankruptcy counsel in the above-captioned case, on the terms described in the Application and as more fully set forth therein; and upon the Declaration of Ann Marie Uetz (the "Uetz")

¹ Capitalized terms not defined herein shall have the meanings

1 Declaration”) and all other submissions filed in support of the Application; and due and proper notice of
2 the Application having been given; and the Court having found that it has jurisdiction over this matter
3 under 28 U.S.C. §§ 157 and 1334, that this is a core proceeding under 28 U.S.C. §§ 157(a)-(b) and
4 1334(b), and that venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409; and the Court
5 being satisfied based on the representations made in the Application and the Uetz Declaration that Foley
6 does not hold or represent any interest adverse to the Debtor’s estate in the above-captioned case and is
7 disinterested under section 101(14) and meets the requirements for employment under section 327(a) of
8 the Bankruptcy Code; and the Court finding that cause exists for the entry of this Order, and for authorizing
9 the employment of Foley & Lardner LLP as counsel for the Debtor effective as of the Petition Date,
10 including that such employment as of the Petition Date is in the best interests of the Debtor’s estate;

11 **IT IS HEREBY ORDERED** that:

- 12 1. The Application is APPROVED as set forth in this Order.
- 13 2. The Debtor is authorized to retain and employ Foley as its general bankruptcy counsel in
14 this case, effective as of the Petition Date, under the terms set forth in the Application.
- 15 3. Foley’s compensation and reimbursement in respect to its fees and expenses incurred
16 representing the Debtor shall be subject to further order of the Court in accordance with the procedures
17 and standards set forth in sections 330 and 331 of the Bankruptcy Code, such Federal Rules of Bankruptcy
18 Procedure and local rules as may be applicable from time to time, and such procedures as may be fixed
19 by order of this Court, as well as the *United States Bankruptcy Court Northern District of California*
20 *Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees*, effective
21 *February 19, 2014*, and the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and*
22 *Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*,
23 *effective November 1, 2013*.
- 24 4. Notwithstanding anything to the contrary in this Order, or the Application, the Court is not
25 approving terms and conditions of Foley’s employment under 11 U.S.C. § 328(a).
- 26 5. In the event of any inconsistency between the Application and this Order, this Order shall
27 govern.

1 6. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be
2 immediately effective and enforceable immediately upon its entry.

3 7. The Debtor is authorized and empowered to take all action necessary to effectuate the relief
4 granted in this Order.

5 8. This Court shall retain jurisdiction with respect to all matters arising from or related to the
6 implementation, interpretation, or enforcement of this Order.

7 **APPROVED AS TO FORM:**

8 OFFICE OF THE UNITED STATES TRUSTEE

9
10 By: /s/ Jason Blumberg
11 Jason Blumberg
Trial Attorney

12 *** END OF ORDER ***
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COURT SERVICE LIST

All ECF Recipients.

EXHIBIT B

CUSTOMARY AND COMPARABLE DISCLOSURES WITH FEE APPLICATIONS

(SEE GUIDELINES C.3 FOR DEFINITION OF TERMS USED IN THIS EXHIBIT.)

Category of Timekeeper	Blended Hourly Rate¹⁹	
	BILLED Firm for preceding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner ²⁰	\$839	\$952.03
Associate ²¹	\$516	\$699.12
Paralegal ²²	\$287	\$360.41
All timekeepers aggregated	\$611	\$830.58

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Foley & Lardner LLP
Date of Application:	October 15, 2025
Interim or Final:	Interim

¹⁹ These amounts include timekeepers whose *de minimis* time has been written off in this Interim Application.

²⁰ Partner category includes Of Counsel.

²¹ Associate category includes Senior Counsel and Special Counsel.

²² Paralegal category includes Project Assistant.

EXHIBIT C

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

Name of Professional Individual²³	Initials	Department, Group or Section	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Alexander A. Witz	AAWT	Litigation	Associate, 2024	\$525	38.50	\$20,212.50
Aleyda P. Castro	APCA	Litigation	Associate, 2023	\$635	7.40	\$4,699.00
Amani S. Kmeid	ASK	Litigation	Associate, 2022	\$650	38.40	\$24,960.00
Ana Sofia Batista	ASBT	Litigation	Associate, 2023	\$600	6.60	\$3,960.00
Angelica M. Lopez	AMPL	Litigation	Associate, 2024	\$550	2.80	\$1,540.00
Ashley A. Gifford	AAG	Litigation	Associate, 2017	\$695	26.00	\$18,070.00
Elizabeth Morales-Saucedo	ELMS	Litigation	Associate, 2024	\$650	9.50	\$6,175.00
Eloise R. Asfora	ERAS	Litigation	Associate, 2024	\$550	45.40	\$24,970.00
Emily G. Jones	EGJ	Litigation	Associate, 2021	\$650	23.90	\$15,535.00
Emily L. Juneau	ELJ	Litigation	Associate, 2024	\$525	28.00	\$14,700.00
Evan L. Hamling*	ELH	Litigation	Associate, 2021	\$650	1.10	\$715.00
Gerald S. Kerska	GSK	Litigation	Associate, 2017	\$800	4.30	\$3,440.00
Hannah L. Andrews	HLAN	Intellectual Property	Associate, 2020	\$710	5.10	\$3,621.00
Jacqueline M. Beveridge	JMBE	Litigation	Associate, 2023	600	21.90	\$13,140.00
Joseph S. Harper	JSH	Bankruptcy	Associate, 2016	\$800	1.40	\$1,120.00
Loring E. Telleen	LET	Litigation	Associate, 2023	\$650	10.60	\$6,890.00
Mary M. Driscoll	MADR	Litigation	Associate, 2023	\$600	22.30	\$13,380.00
Mary Rofaeil	MRL	Bankruptcy	Associate, 2021	\$675	233.80	\$157,815.00
Mason Roberts	MR	Litigation	Associate, 2018	\$795	94.60	\$75,207.00
Michael W. Berg	MWBE	Litigation	Associate, 2023	\$600	67.30	\$40,380.00
Mikaela R. Mitcham	MRM	Litigation	Associate, 2021	\$675	152.50	\$102,937.50

²³ “*” Denotes an individual who billed fewer than 15 hours and whose time has been written off in the discount listed below.

Name of Professional Individual²³	Initials	Department, Group or Section	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Nicholas S. Covek	NSCO	Litigation	Associate, 2023	\$575	38.80	\$22,310.00
Nora J. McGuffey	NMCG	Bankruptcy	Associate, 2020	\$700	17.30	\$12,110.00
Stephanie L. McPhail	SMP	Litigation	Associate, 2019	\$775	8.20	\$6,355.00
Sydney K. Hecimovich	SKHE	Litigation	Associate, 2021	\$645	46.90	\$30,250.50
Alissa M. Nann	AMN	Bankruptcy	Of Counsel, 2006	\$1,050	32.00	\$33,600.00
Shane J. Moses	SJM	Bankruptcy	Of Counsel, 2005	\$875	464.30	\$406,262.50
Shane J. Moses	SJM	Bankruptcy	Of Counsel, 2005	\$437.50 ²⁴	7.30	\$3,193.75
Brittnie M. Werner*	BMWE	Litigation	Paralegal, N/A	\$290	2.30	\$667.00
Janelle C. Harrison	JCH	Bankruptcy	Paralegal, N/A	\$330	82.20	\$27,126.00
Kerry A. Farrar	KAFA	Litigation	Paralegal, N/A	\$450	31.10	\$13,995.00
Wendy DeValle*	WD	Litigation	Paralegal, N/A	N/A	0.60	\$261.00
Ann Marie Uetz	AMUE	Bankruptcy	Partner, 1993	\$1,050	357.30	\$375,165.00
Eileen R. Ridley	EPK	Litigation	Partner, 1990	\$1,100	81.20	\$89,320.00
Emil P. Khatchatourian	ERR	Bankruptcy	Partner, 2009	\$875	56.60	\$49,525.00
Felicia S. O'Connor	FOC	Labor & Employment	Partner, 2012	\$850	1.30	\$1,105.00
Geoffrey S. Goodman	GSG	Bankruptcy	Partner, 1999	\$1,050	62.40	\$65,520.00
Heidi M. Furlong	HMF	Finance	Partner, 2001	\$1,100	3.60	\$3,960.00
Jason N. Barglow	JBA	Real Estate	Partner, 2001	\$1,150	1.40	\$1,610.00
Jason J. Kohout	JJK	Tax, Benefits & Estate Planning	Partner, 2007	\$975	2.10	\$2,047.50
Jeff R. Blease	JRBL	Litigation	Partner, 1998	\$1,375	5.80	\$7,975.00
Jonathan Michael Thomas	JMT	Litigation	Partner, 2010	\$875	187.20	\$163,800.00
Lisa F. Glahn	LFG	Litigation	Partner, 2000	\$1,200	16.70	\$20,040.00
Mark C. Moore	MCM	Bankruptcy	Partner, 2010	\$925	254.00	\$234,950.00
Matthew D. Krueger	MDK	Litigation	Partner, 2006	\$925	13.40	\$12,395.00

²⁴ The time billed at this rate is related to non-working travel, which is billed at 50% of a timekeeper's normal billing rate.

Name of Professional Individual ²³	Initials	Department, Group or Section	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Matthew D. Lee	MDL	Bankruptcy	Partner, 2006	\$875	275.10	\$240,712.50
Robert T. Slovak*	RTS	Litigation	Partner, 1999	\$875	0.10	\$87.50
Thomas F. Carlucci	TFCA	Litigation	Partner, 1987	\$1,375	54.70	\$75,212.50
Kaylee Soroka*	KASO	Litigation	Project Assistant, N/A	\$290	2.40	\$696.00
Alan R. Ouellette	AROU	Litigation	Senior Counsel, 2010	\$875	6.90	\$6,037.50
Elizabeth P. Mazzocco	EPM	Insurance Litigation	Senior Counsel, 2014	\$840	129.70	\$108,948.00
Jake W. Gordon	JWGO	Finance	Senior Counsel, 2017	\$815	5.00	\$4,075.00
Laura P. Mikeworth	LPM	Real Estate	Senior Counsel, 2017	\$815	11.40	\$9,291.00
Robert T. Stewart	RTST	Litigation	Senior Counsel, 2014	\$825	9.30	\$7,672.50
Tamar N. Dolcourt	TND	Bankruptcy	Special Counsel, 2009	\$800	192.90	\$154,320.00
Nicole Kassabian*	NIKA	Litigation	Summer Associate, N/A	\$390	1.70	\$663.00
SUBTOTAL					3,304.60	\$2,744,725.75
REDUCTION FOR <i>DE MINIMIS</i> TIMEKEEPERS					8.2	\$3,089.50
TOTAL					3,296.40	\$2,741,636.25

Case Name: The Roman Catholic Bishop of Oakland
 Case Number: 23-bk-40523
 Applicant's Name: Foley & Lardner LLP
 Date of Application: October 15, 2025
 Interim or Final: Interim

EXHIBIT D

SUMMARY OF COMPENSATION REQUESTED BY CATEGORY

(SEE GUIDELINES ¶ C.8 FOR PROJECT CATEGORY INFORMATION)

Category	Hours Billed This Fee Period	Total Amount This Fee Period
002 – Asset Sale / 363 Sales	38.10	\$35,177.50
003 – Automatic Stay	51.30	\$45,269.00
004 – Bankruptcy Litigation/Adversary Proceedings	176.90	\$143,144.50
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues	15.50	\$12,208.50
006 – Case Administration (Docket Updates, WIP and calendar)	54.30	\$21,441.50
007 – Chapter 11 Plan/Plan Confirmation	432.80	\$409,003.00
008 – Communications with Client	125.80	\$121,142.50
009 – Corporate Governance and Board Issues	8.30	\$8,343.00
011 – Cash Management	48.70	\$45,765.00
016 – General Case Strategy (includes calls with client and team calls)	247.90	\$221,235.50
017 – Hearings and Courts Matters	103.10	\$94,352.00
018 – Non-Bankruptcy Litigation	40.70	\$38,595.00
019 – Non-Working Travel	7.30	\$3,193.75
020 – Retention/Billing/Fee Applications for Debtor Professionals	128.40	\$102,541.50
021 – Retention/Fee Applications: Ordinary Course Professionals	14.90	\$12,477.50
022 – Retention/Fee Applications: Other Professionals	54.90	\$43,119.50
023 – Schedules / Statement of Financial Affairs	1.20	\$1,095.00
025 – U.S. Trustee Issues/Meetings/Communications/Monthly Operating Report	11.20	\$8,775.00
026 – Unsecured Creditors Issues/Communications/Meetings	30.20	\$27,900.00
027 – Real Estate and Real Property Issues	25.80	\$22,892.50
028 – Tort Claims	4.50	\$3,257.50
030 – Insurance Issues (other than coverage)	0.30	\$277.50
031 – Insurance Issues (coverage)	321.00	\$282,636.50
032 – Rule 2004 Motions/Discovery/Subpoenas	1,294.70	\$982,609.50
034 – Other Motion Practice	16.70	\$11,722.00
035 – General Counsel Matters	18.90	\$17,868.00
037 – Financing	19.10	\$17,247.50
038 – Mediation	12.10	\$11,435.50
SUBTOTAL	3,304.60	\$2,744,725.75
REDUCTION FOR <i>DE MINIMIS</i> TIMEKEEPERS	8.2	\$3,089.50
TOTAL	3,296.40	\$2,741,636.25

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Foley & Lardner LLP
Date of Application:	October 15, 2025
Interim or Final:	Interim

EXHIBIT E

SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY

(SEE GUIDELINES ¶ C.8 FOR PROJECT CATEGORY INFORMATION)

Costs/Expense	Amount Billed
Depositions, Transcripts, Exams	\$11,251.64
Document Retrieval	\$182.31
Electronic Legal Research Services	\$1,809.53
LSS – eDiscovery Services	\$46,000.00
Meals	\$1,704.63
Other Expenses	\$191.97
Other Fees	\$328.00
Service Fees	\$80.00
Shipping Charges	\$33.95
(Unallocated Credits)	(\$81.00)
TOTAL	\$61,501.03

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Foley & Lardner LLP
Date of Application:	October 15, 2025
Interim or Final:	Interim

EXHIBIT F

FOLEY BUDGET AND STAFFING PLAN

The Foley attorneys and paraprofessionals staffed on this case, subject to modification depending on further development, are set forth in (1) the Declaration of Ann Marie Uetz in Support of 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, and (2) supplemented as set forth in Exhibit C of this Interim Application, and the Debtor has approved that staffing. Before the Petition Date, Foley estimated the approximate cost per month of its services and expenses for the Bankruptcy Case with certain months being higher and certain months being lower in amount, and also provided an estimate for all services and expenses in the case assuming a certain duration for the case, and the Debtor approved that estimate. However, due to the exponential escalation of legal fees resulting from the Committee's litigation in opposition to the Plan, the fees in this Chapter 11 Case are greater than initially estimated by the Debtor. For example, the Debtor had originally projected \$1.4MM per month for professional fees through September 2025, and but had to increase its projection to \$3.9MM for May through August 2025, and then \$2.1MM in September 2025 – and even then it appeared to the Debtor the increase in its projections was still not enough to cover the fees being charged and driven by the Committee. Foley has discussed this with the Debtor and has worked with the Debtor on its cash forecast, resulting in the Motion to Dismiss which is now pending. Foley's fees for the Interim Fee Period are within 10% of the Debtor's most recent estimates.

EXHIBIT G

FOLEY INVOICES



FOLEY & LARDNER LLP
111 HUNTINGTON AVENUE
SUITE 2600
BOSTON, MASSACHUSETTS 02199-7610
TELEPHONE (617) 342-4000
FACSIMILE (617) 342-4001
WWW.FOLEY.COM

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

Date: June 30, 2025
Invoice No.: 51094824
Our Ref. No.: 100845-0402

Services through May 31, 2025

Amount due for professional services rendered regarding
Chapter 11 Bankruptcy \$1,183,009.00

Total Expenses: \$11,942.18

Less Unallocated Credits: (\$81.00)

Amount Due: \$1,194,870.18

Please reference your invoice number 51094824 with your remittance
payable to Foley & Lardner LLP. Payment is due promptly upon receipt
of our invoice.

Federal Employer Number:
39-0473800

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51094824

Page 2

Foley & Lardner LLP

June 30, 2025

Professional Services Detail**003 Automatic Stay**

05/19/25	SJM	Call with L. Katz regarding potential stipulation for relief from stay (.3); email to M. Lee regarding same (.2).	0.50	\$437.50
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Task Total:	0.50	\$437.50
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004 Bankruptcy Litigation/Adversary Proceedings

05/05/25	MDL	Draft list of factual allegations in Committee's draft adversary proceeding complaint for which Debtor may demand redactions for including confidential information.	0.40	\$350.00
05/05/25	MDL	Analyze draft Committee complaint against RCC, RCWC, and Adventus for confidential information.	0.80	\$700.00
05/05/25	MR	Communications with R. Stewart in connection with request for information by M. Lee and A. Uetz regarding discrete categories of documents produced to the Committee.	0.40	\$318.00
05/06/25	GSG	Telephone conference with Norton Rose on Committee amended complaints (.4); review complaints in preparation for same (.5).	0.90	\$945.00
05/06/25	GSG	Correspondence with Committee regarding status hearing and schedule for motions to dismiss.	0.30	\$315.00
05/06/25	MDL	Evaluate confidential information in Committee's proposed adversary complaint against RCWC, RCC, and Adventus.	0.40	\$350.00
05/06/25	MWBE	Discuss amended complaint and accompanying research assignment with S. Moses.	0.10	\$60.00
05/06/25	SJM	Email to M. Berg regarding research needed for response to amended complaint.	0.30	\$262.50
05/06/25	SJM	Review amended complaint in preparation for call with counsel for co-defendants regarding same (.4); call with counsel for co-defendants regarding approach to amended complaint (.4).	0.80	\$700.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51094824

Page 3

Foley & Lardner LLP

June 30, 2025

05/06/25	SJM	Respond to counsel for Committee regarding unredacted amended complaint.	0.20	\$175.00
05/07/25	GSG	Summarize restricted assets issues (.3); draft talking points for status hearing on motions to dismiss (.5).	0.80	\$840.00
05/07/25	MCM	Prepare for (.5) and participate in strategy conference regarding adversary proceedings in RCBO bankruptcy case (.5).	1.00	\$925.00
05/07/25	MWBE	Discuss research assignment with S. Moses (.3); begin work on same (1.8); discuss assignment regarding Committee objection with A. Uetz (.2); begin work on same (.4).	2.70	\$1,620.00
05/07/25	SJM	Email correspondence regarding briefing schedule for motions to dismiss adversary proceedings.	0.30	\$262.50
05/07/25	SJM	Call with M. Berg regarding research for potential motion to dismiss (.4); email detailed research issues (4).	0.80	\$700.00
05/07/25	SJM	Prepare for call regarding restricted assets (.3); call with G. Goodman and VeraCruz regarding restricted assets substantiation process (.8).	1.10	\$962.50
05/08/25	GSG	Draft summary of Committee's amended complaints for M. Kemner and A. Bardos.	0.40	\$420.00
05/08/25	MWBE	Attention to research on restricted gifts per S. Moses.	1.10	\$660.00
05/08/25	SJM	Email to M. Berg regarding approach to research for adversary proceeding.	0.60	\$525.00
05/08/25	SJM	Analyze amended complaint for substantive consolidation and approach to same (1.8); email to N. McGuffey regarding same (.3).	2.10	\$1,837.50
05/09/25	GSG	Telephone conference and correspondence with A. Bardos, L. Oberempt and D. Flanagan regarding restricted assets (.7); review CA law issues on restricted assets (.5).	1.20	\$1,260.00
05/09/25	MWBE	Attention to research and memo on restricted gifts (2.9); discuss state of research with S. Moses (.4).	3.30	\$1,980.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51094824

Page 4

Foley & Lardner LLP

June 30, 2025

05/09/25	SJM	Call with M. Berg regarding findings from research (.4); call with G. Goodman regarding same (.1); analyze approach in light of research (1.6).	2.10	\$1,837.50
05/12/25	MWBE	Attention to research and memo on restricted gifts.	3.50	\$2,100.00
05/12/25	SJM	Analyze research regarding restricted asset issues.	1.30	\$1,137.50
05/13/25	GSG	Review draft of restricted assets communication (.2); comment on same (.2); correspondence with L. Oberempt regarding deposition (.1).	0.50	\$525.00
05/13/25	MWBE	Finish memo on restricted gifts and share with S. Moses.	0.80	\$480.00
05/14/25	GSG	Review memo on restricted assets issues (.3); telephone conference with M. Berg and S. Moses regarding same (.4).	0.70	\$735.00
05/14/25	MWBE	Prepare for (.3) and discuss research on restricted gifts and charitable trusts with S. Moses and G. Goodman (.4).	0.70	\$420.00
05/14/25	SJM	Review research on restricted asset issues (1.1); review restricted asset documentation (.6); analyze approach to restricted assets (.5); call with G. Goodman and M. Berg regarding same (.4).	2.60	\$2,275.00
05/15/25	MWBE	Further research on restricted gifts and charitable trusts per S. Moses and G. Goodman.	1.30	\$780.00
05/15/25	NSCO	Correspond with A. Uetz and T. Dolcourt regarding discovery project.	0.20	\$115.00
05/15/25	SJM	Call with G. Goodman regarding approach to responses to adversary proceedings.	0.20	\$175.00
05/16/25	GSG	Telephone conference with Norton Rose regarding amended complaint (.6); prepare for same (.6).	1.20	\$1,260.00
05/16/25	NMCG	Meeting with Foley and Norton Rose to discuss amended complaints and strategy.	0.70	\$490.00
05/16/25	SJM	Call with G. Goodman regarding approach to responding to Committee amended complaints.	0.50	\$437.50
05/18/25	NMCG	Draft motion to dismiss the first amended complaint filed by Committee in the sub-con adversary proceeding.	7.30	\$5,110.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 51094824

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Foley & Lardner LLP

June 30, 2025

05/19/25	NMCG	Continue drafting the motion to dismiss first amended complaint of subcon adversary proceeding.	2.80	\$1,960.00
05/19/25	SJM	Initial review of draft motion to dismiss alter ego amended complaint.	0.60	\$525.00
05/20/25	MWBE	Discuss research project with S. Moses.	0.20	\$120.00
05/20/25	SJM	Call with counsel for non-debtor defendants and G. Goodman regarding approach to amended complaints in Committee adversary proceedings.	0.60	\$525.00
05/20/25	SJM	Analyze potential issue regarding restricted assets complaint (1.1); email to M. Berg regarding research for same (.3).	1.40	\$1,225.00
05/21/25	GSG	Analyze Rule 19 argument for restricted funds case (.6); meet with M. Berg regarding same (.3).	0.90	\$945.00
05/21/25	MWBE	Discuss motion to dismiss strategy with G. Goodman.	0.40	\$240.00
05/21/25	MWBE	Research question regarding necessary parties under Rule 19 per S. Moses and G. Goodman.	2.70	\$1,620.00
05/21/25	SJM	Emails regarding privileged matter for response to adversary proceeding.	0.30	\$262.50
05/21/25	SJM	Telephone call with G. Goodman regarding research for motion to dismiss restricted assets complaint (.2); revise draft motion to dismiss alter ego complaint (2.3).	2.50	\$2,187.50
05/21/25	SJM	Email to M. Berg regarding research in support of potential motion to dismiss restricted assets complaint.	0.40	\$350.00
05/22/25	AMUE	Communications with client leadership regarding privileged issue concerning motion to dismiss adversary proceeding.	0.70	\$735.00
05/22/25	GSG	Edit motion to dismiss RCWC, et al. complaint (3.5); edit motion to dismiss restricted funds complaint (2.9).	6.40	\$6,720.00
05/22/25	MWBE	Draft motion to dismiss per G. Goodman.	5.30	\$3,180.00
05/22/25	MWBE	Updates to motion to dismiss first amended complaint per G. Goodman.	0.40	\$240.00

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05/22/25	NMCG	Revise part of motions to dismiss (.3); discussion with G. Goodman regarding the same (.2).	0.50	\$350.00
05/22/25	SJM	Revise motion to dismiss restricted assets adversary proceeding.	1.30	\$1,137.50
05/23/25	KASO	Cite-check and add TOA and TOC's to briefs for N. McGuffey and M. Berg.	1.40	\$406.00
05/23/25	MWBE	Edits to motions to dismiss as requested by team.	2.90	\$1,740.00
05/23/25	NIKA	Confer with associate regarding authorities and statutes from briefs (.1); compile research from two briefs (1.3); examine claims agent site for docketed items (.3).	1.70	\$663.00
05/23/25	NMCG	Revise motions to dismiss for finalization (1.0); correspond with Foley working team regarding the same (.2).	1.20	\$840.00
05/23/25	SJM	Finalize motion to dismiss substantive consolidation adversary proceeding (.6); draft notice of hearing on same (.4); finalize motion to dismiss OPF adversary proceeding (.5); draft notice of hearing on same (.3).	1.80	\$1,575.00
05/23/25	SJM	Call with Committee counsel regarding scheduling for adversary proceeding hearings (.1); emails with chambers regarding same (.1).	0.20	\$175.00
05/28/25	GSG	Review Committee responses to motions to dismiss.	0.80	\$840.00
05/28/25	GSG	Telephone conference with M. Lee regarding depositions and motions to dismiss.	0.20	\$210.00
05/28/25	MWBE	Discuss reply in support of motion to dismiss with team.	0.10	\$60.00
05/28/25	SJM	Initial review of Committee responses to motions to dismiss adversary proceedings.	0.80	\$700.00
05/29/25	GSG	Review summary of Committee response points on RCWC et al. motion to dismiss (.3); correspondence with M. Kemner and A. Bardos regarding responses to motions to dismiss (.2); review L. Oberempts deposition issues (.2); review restricted asset issues (.6).	1.30	\$1,365.00
05/29/25	JCH	Download PACER docket for transcripts from status hearings in District Court case.	0.50	\$165.00

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05/29/25	NMCG	Analyze the Committee's response to the motion to dismiss.	1.50	\$1,050.00
05/30/25	MWBE	Attention to reply in support of motion to dismiss adversary complaint re OPF.	0.30	\$180.00
05/31/25	SJM	Draft reply in support of motion to dismiss bond-obligated group adversary proceeding.	3.10	\$2,712.50
Task Total:			88.80	\$69,049.50

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

05/08/25	MCM	Analysis of issues concerning potential claim objections.	0.40	\$370.00
05/09/25	MCM	Analysis of issues concerning potential claim objections.	0.40	\$370.00
05/13/25	MCM	Email correspondence with claims and noticing agent regarding allowance of late-filed JB Doe claim and related issues (.3); analyze filed claim (.5).	0.80	\$740.00
05/15/25	MCM	Email correspondence with Verita team and Committee counsel regarding late-filed JB Doe and solicitation of counsel for same to vote on the plan.	0.50	\$462.50
Task Total:			2.10	\$1,942.50

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

05/01/25	JCH	Update daily docket report.	0.20	\$66.00
05/01/25	MRL	Update the calendar of the confirmation process for the Foley team.	0.20	\$135.00
05/02/25	JCH	Update daily docket report.	0.20	\$66.00
05/04/25	MRL	Email correspondence with A. Uetz regarding the calendar for the confirmation process.	0.20	\$135.00
05/05/25	JCH	Update daily docket report.	0.50	\$165.00
05/05/25	MRL	Update the calendar of the confirmation process for the Foley team.	0.40	\$270.00

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05/06/25	JCH	Update daily docket report.	0.50	\$165.00
05/06/25	MRL	Update the calendar of the confirmation process for the Foley team.	0.50	\$337.50
05/07/25	JCH	Prepare (.4) and file (.1) Notice of Core Service List as of May 7, 2025; update daily docket report (.5).	1.00	\$330.00
05/08/25	EPK	Review updates to the master case calendar and key dates timeline.	0.10	\$87.50
05/08/25	JCH	Update Timeline and Master Case Calendar (.5); update daily docket report (.5).	1.00	\$330.00
05/08/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.30	\$240.00
05/08/25	MRL	Email correspondence with A. Uetz regarding the calendar for the confirmation process.	0.20	\$135.00
05/09/25	JCH	Calendar continued status conference (.2); update daily docket report (.5).	0.70	\$231.00
05/12/25	JCH	Update daily docket report.	0.20	\$66.00
05/13/25	JCH	Update daily docket report.	0.50	\$165.00
05/13/25	MRL	Update the calendar of the confirmation process for the Foley team.	0.30	\$202.50
05/14/25	JCH	Calendar continued hearing set on BRG data security incident (.1); update daily docket report (.5).	0.60	\$198.00
05/15/25	JCH	Update daily docket report.	0.50	\$165.00
05/16/25	JCH	Update daily docket report.	0.20	\$66.00
05/19/25	JCH	Update daily docket report.	0.50	\$165.00
05/20/25	JCH	Update daily docket report.	0.20	\$66.00
05/21/25	JCH	Update daily docket report.	0.50	\$165.00
05/27/25	JCH	Calendar new time of status conference on June 4, 2025 (.1); update daily docket report (.8).	0.90	\$297.00
05/28/25	JCH	Update daily docket report.	0.50	\$165.00
05/29/25	JCH	Update daily docket report.	0.50	\$165.00

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05/30/25	JCH	Update daily docket report.	0.50	\$165.00
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Task Total:	11.90	\$4,743.50
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007 Chapter 11 Plan/ Plan Confirmation

05/01/25	AMUE	Meeting with S. Moses and G. Goodman to analyze restricted assets issue (1.0); follow-up review of documents related to same (.8).	1.80	\$1,890.00
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05/01/25	GSG	Telephone conference with RCBO team, D. Flanagan and A&M regarding restricted assets.	0.90	\$945.00
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05/01/25	SJM	Review documents related to restricted assets in preparation for call with client (1.8); call with D. Flanagan regarding restricted assets matters in preparation for team call (.6); team call regarding restricted assets (partial) (.6); draft email to case team detailing restricted assets substantiation process and findings (.8).	3.80	\$3,325.00
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05/01/25	SJM	Work on witness list for plan confirmation.	1.10	\$962.50
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05/01/25	SJM	Emails to T. Dolcourt regarding witness prep outlines.	0.40	\$350.00
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05/01/25	TND	Research for Bishop Barber deposition preparation (2.1); begin preparing deposition prep outline (.8).	2.90	\$2,320.00
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05/02/25	AMUE	Outline witness issues for contested confirmation hearing.	1.30	\$1,365.00
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05/02/25	AMUE	Revisions to fact witness list (.6); communications with M. Kemner and A. Bardos regarding fact witness list (.5).	1.10	\$1,155.00
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05/02/25	MCM	Attention to disclosure of fact witnesses pursuant to Scheduling Order on confirmation of Debtor's plan (.5); analysis of expert witness issues (.3).	0.80	\$740.00
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05/02/25	MDL	Revise Debtor's fact witness list.	1.30	\$1,137.50
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05/02/25	MRL	Confer with M. Moore regarding the employment of Denise Martin as expert (.1); analyze draft engagement letter to the Debtor (.5).	0.60	\$405.00
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05/02/25	SJM	Review witness list for plan confirmation (.5); emails with case team regarding same (.2); email to other parties with witness list (.3).	1.00	\$875.00
05/02/25	SJM	Call with D. Flanagan regarding restricted assets (.9); email to S. Levitt regarding same (.2); call with S. Levitt regarding same (.2).	1.30	\$1,137.50
05/02/25	TND	Further drafting of outline for Bishop Barber's deposition prep.	0.20	\$160.00
05/03/25	TND	Review Committee's disclosure statement objections to determine potential plan objections (.4); further preparation of outline for Bishop Barber (.6).	1.00	\$800.00
05/04/25	MDL	Email exchange with M. Plevin regarding Committee fact witness list and anticipated depositions of fact witnesses.	0.10	\$87.50
05/04/25	SJM	Emails regarding restricted assets substantiation process.	0.30	\$262.50
05/05/25	AMUE	Prepare for (.4) and meeting with (.9) Hilco regarding expert work concerning real estate.	1.30	\$1,365.00
05/05/25	JJK	Conference regarding restricted cash substantiation.	0.30	\$292.50
05/05/25	SJM	Call with S. Levitt regarding restricted asset analysis (.3); call with J. Kohout regarding same (.4); call with A. Bardos regarding same (.2); analyze restricted asset substantiation (.7); draft detailed email report to A. Uetz regarding restricted assets information provided to Committee to date (1.2).	2.80	\$2,450.00
05/05/25	TND	Further work on deposition prep outline for Bishop Barber.	1.60	\$1,280.00
05/06/25	AMUE	Meeting with Hilco team to discuss real estate valuations (.8); prepare for same (.9).	1.70	\$1,785.00

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05/06/25	MCM	Analysis of information request from Unknown Claims Representative regarding claims information in light of bar date order and confidentiality (.7); email correspondence with counsel for Unknown Claims Representative regarding meeting (.3); work on voting report issues with client parties and Foley team (.6); conference call with client parties regarding class 3 claims and voting (.5).	2.10	\$1,942.50
05/06/25	MDL	Strategize with M. Moore regarding disclosure of balloting results.	0.40	\$350.00
05/06/25	SJM	Assist with issue related to preparation of amended real estate disclosure.	1.00	\$875.00
05/07/25	MCM	Conference call with client parties regarding claim reconciliation and voting analysis (1.0); analysis of issues in connection with same (.8).	1.80	\$1,665.00
05/07/25	MDL	Telephone conference with M. Moore regarding voting issues.	0.30	\$262.50
05/08/25	AMUE	Analyze deposition strategy (.5) and meeting with M. Lee and M. Moore to discuss same (.6).	1.10	\$1,155.00
05/08/25	MCM	Prepare for (.5) and participate in (.7) strategy meeting with M. Lee and A. Uetz regarding confirmation issues; meeting with Unknown Claims Representative to discuss plan and related issues (.7).	1.90	\$1,757.50
05/08/25	MDL	Strategize with Foley team regarding deposition scheduling and identity of certain witnesses (.7); follow up on same (.3).	1.00	\$875.00
05/08/25	MRL	Review email correspondence regarding the engagement letter with Denise Martin (.1); confer with M. Moore regarding the same (.1).	0.20	\$135.00
05/09/25	MCM	Conference call with client parties and Foley team regarding Class 3 voting and related issues (.8); analysis of additional solicitation to Class 3 claimants and confirmation of same with claims and noticing agent (.6).	1.40	\$1,295.00
05/09/25	SJM	Call with client regarding restricted asset issues for plan.	0.50	\$437.50
05/12/25	AMUE	Analyze voting update.	0.30	\$315.00

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05/12/25	MCM	Work on issues in connection with fact depositions, expert retention, and preparation for confirmation hearing (.8); review voting summary from claims and noticing agent and draft email to Foley team with same (.4).	1.20	\$1,110.00
05/12/25	MRL	Review email correspondence from the Foley team regarding the retention of Denise Martin as an expert.	0.20	\$135.00
05/13/25	AMUE	Analyze opposition to Committee's expert retention applications (.5) and outline same with M. Lee (.5).	1.00	\$1,050.00
05/14/25	MCM	Attention to expert witness issues in connection with confirmation (.5); email correspondence regarding deposition dates, calendaring, and related matters (.5); email correspondence regarding witness assignments for confirmation (.3).	1.30	\$1,202.50
05/15/25	AMUE	Meeting with Hilco team regarding privileged issue concerning real estate.	1.00	\$1,050.00
05/15/25	AMUE	Strategize regarding expert witnesses for confirmation hearing, in light of three retention applications filed by the Committee (1.4); analyze arguments in opposition to Committee's retention motions (1.3).	2.70	\$2,835.00
05/15/25	MCM	Review voting amount spreadsheet from Verita team detailing solicitation to date (.3); conference call with client parties regarding Class 3 voting and solicitation (.5).	0.80	\$740.00
05/15/25	TFCA	Attention to prep for Bishop Barber deposition (.2); search for depositions and emails regarding same (.3).	0.50	\$687.50
05/16/25	MCM	Email correspondence with counsel for Unknown Claims Representative regarding plan and voting discussion (.3); prepare for depositions of Gies and Currier in RCBO bankruptcy in connection with confirmation (.5); analysis of confirmation issues and strategy (1.0).	1.80	\$1,665.00
05/16/25	MCM	Attention to retention issues regarding expert witness in connection with confirmation of plan.	0.60	\$555.00

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05/16/25	MDL	Evaluate options for addressing Unknown Abuse Claims Representative's comments on plan.	0.10	\$87.50
05/16/25	SJM	Email to K. Martens regarding canon law issue.	0.30	\$262.50
05/17/25	MCM	Review email correspondence with deposition schedule from Committee and confirm availability for assigned dates (.4); follow-up emails with counsel for Unknown Claims Representative about further plan discussions (.2).	0.60	\$555.00
05/18/25	AMUE	Prepare for deposition of Bishop Barber.	0.80	\$840.00
05/18/25	GSG	Correspondence with team regarding L. Oberempt deposition.	0.10	\$105.00
05/18/25	MCM	Email correspondence with counsel for Unknown Claims Representative (.2); analyze 30(b)(6) deposition notice to Debtor (.4).	0.60	\$555.00
05/19/25	AMUE	Draft expert witness disclosure (1.2); communications with C. Moore regarding same (.6); prepare for deposition of Bishop Barber (1.5); prepare for deposition of A. Bardos (1.5).	4.80	\$5,040.00
05/19/25	GSG	Correspondence with A. Bardos and L. Oberempt regarding restricted assets (.2); draft outline of key restricted assets issues for A. Bardos (1.3).	1.50	\$1,575.00
05/19/25	MCM	Email correspondence with counsel for Unknown Claims Representative regarding plan issues (.4); respond to inquiry regarding certain claims in connection with confirmation and review records regarding same (.4); pull documents in connection with deposition preparation for various witnesses (.5); review latest voting report summary and disseminate to client parties (.3); review and analyze expert disclosures and topics on same (.4); strategize with M. Lee regarding status of various confirmation workstreams (.3).	2.30	\$2,127.50
05/19/25	MR	Summarize contents of certain prior document productions per A. Uetz request, in furtherance of preparation of deposition witnesses.	0.60	\$477.00
05/19/25	SJM	Emails to T. Dolcourt regarding deposition preparation.	0.40	\$350.00

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05/19/25	SJM	Analyze privileged issue regarding plan terms and treatment of claims (.8); email to A. Uetz regarding same (.2).	1.00	\$875.00
05/19/25	TFCA	Begin review of materials for deposition prep (1.0); discussion regarding reach-out to parishes with J. Blease (.2).	1.20	\$1,650.00
05/19/25	TND	Further work preparing outline and documents for Bishop Barber's deposition preparations.	2.70	\$2,160.00
05/20/25	ERR	Prepare for Bishop Barber's deposition including review of documents identified for deposition and potential production regarding insurance issues.	4.50	\$4,950.00
05/20/25	GSG	Telephone conference with RCBO team regarding deposition preparation and restricted funds issues.	0.60	\$630.00
05/20/25	MCM	Analyze voting summary through May 19 (.4); telephone conference with P. Bongiovanni and A. Bardos regarding same and continuing efforts on Class 3 claimants (.5).	0.90	\$832.50
05/20/25	SJM	Review plan terms regarding supplement (.5); email to case team regarding same (.2).	0.70	\$612.50
05/20/25	TFCA	Review outline and documents (3.0); strategize with A. Uetz and M. Lee regarding deposition prep and related strategy issues (1.5).	4.50	\$6,187.50
05/21/25	ERR	Prepare for (1.5) and attend deposition preparation with Bishop Barber (4.5).	6.00	\$6,600.00
05/21/25	MCM	Attention to plan supplement issues and requirements pursuant to filed third amended plan and order approving disclosure statement.	0.50	\$462.50
05/21/25	MCM	Review update from S. Moses regarding Class 6 claims and voting results to date (.3); review voting summary update from claims and noticing agent and forward to Committee counsel (.4).	0.70	\$647.50
05/21/25	MDL	Evaluate options for re-opening voting record date.	0.10	\$87.50
05/21/25	MRL	Review email correspondence from T. Dolcourt regarding retention of Denise Martin as expert witness.	0.20	\$135.00

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05/21/25	TFCA	Review documents in advance of Bishop Barber deposition prep (1.0); review outline regarding same (.5); attend deposition prep with Bishop Barber (4.5); review and respond to follow-up emails (.4); telephone call with A. Uetz regarding same (.4).	6.80	\$9,350.00
05/22/25	GSG	Telephone conference with Dr. Martens regarding canon law issues and restricted funds complaint.	0.50	\$525.00
05/22/25	MCM	Review voting summary update from claims and noticing agent (.3); email correspondence with client parties regarding same (.3).	0.60	\$555.00
05/22/25	SJM	Meeting with G. Goodman and K. Martens regarding canon law issues relevant to plan.	0.50	\$437.50
05/22/25	TFCA	Review follow-up email from A. Uetz regarding discovery and plan scheduling confirmation issues (.3); review update email regarding DRB from L. Glahn (.3).	0.60	\$825.00
05/23/25	JJK	Review tax-exempt and Catholic Directory Questions.	1.00	\$975.00
05/23/25	MCM	Email correspondence with client parties regarding confirmation standards and voting results so far.	0.50	\$462.50
05/23/25	MCM	Attention to plan supplement issues prior to filing same.	0.50	\$462.50
05/23/25	MDL	Analyze CCCEB settlement documents and Survivor's Trust Documents in advance of filing with plan supplement.	0.60	\$525.00
05/23/25	SJM	Strategize with M. Lee regarding plan supplement (.3); work on plan supplement (1.4).	1.70	\$1,487.50
05/26/25	SJM	Attention to documents related to restricted assets (.7); email to D. Flanagan regarding same (.2).	0.90	\$787.50
05/27/25	MCM	Review updated voting summary and forward to Foley team.	0.40	\$370.00
05/27/25	SJM	Call with A. Uetz and D. Flanagan (for part) regarding restricted assets issues (.4); review documents regarding restricted assets (1.3); call with P. Bongiovanni regarding background on certain restricted gifts (.5); emails to A. Uetz summarizing same (.7).	2.90	\$2,537.50

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05/28/25	AMUE	Prepare for deposition of D. Flanagan (1.2); attend deposition (6.0); debrief client from deposition (1.4).	8.60	\$9,030.00
05/28/25	MCM	Analyze latest voting summary in context of confirmation hearing (.4); email correspondence with Committee regarding same (.2); review email correspondence regarding updated deposition schedules (.3).	0.90	\$832.50
05/28/25	SJM	Prepare for 30(b)(6) deposition of RCC (.6); attend 30(b)(6) deposition of RCC (5.6); email to case team with detailed notes on deposition (.7).	6.90	\$6,037.50
05/29/25	AMUE	Prepare for deposition of Bishop Barber.	2.20	\$2,310.00
05/29/25	MCM	Conference call with P. Bongiovanni regarding voting process and results to date.	0.50	\$462.50
05/29/25	SJM	Email correspondence regarding potential subjects of L. Oberempt deposition.	0.30	\$262.50
05/29/25	TFCA	Comment on standard witness prep slides for M. Kemner (.6); review F. B outline and provide comments and edits (.7); review outline for Bishop Barber prep and review and comment on same (.9); emails regarding various issues raised by M. Moore in preparation for Bishop Barber deposition (.4).	2.60	\$3,575.00
05/30/25	MCM	Conference call with A&M regarding confirmation issues.	0.50	\$462.50
05/30/25	SJM	Email correspondence with counsel for insurers regarding Judge Hogan deposition.	0.40	\$350.00
05/30/25	SJM	Attend deposition of Judge Hogan.	2.90	\$2,537.50
05/30/25	SJM	Telephone calls with creditors regarding plan and disclosure statement (.4); email correspondence with creditors regarding same (.6); follow up with Verita regarding replacement ballot for creditor (.3).	1.30	\$1,137.50

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05/30/25	TFCA	Prepare for call with M. Moore and A. Uetz (.4); attend call with M. Moore and A. Uetz regarding issues for deposition (.3); follow up with A. Uetz regarding finalizing email to M. Kemmner regarding deposition outline for Bishop Barber (.2); review basis prep slides (.4); several telephone calls with M. Kemner regarding various issues (.8).	2.10	\$2,887.50
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Task Total:	133.10	\$134,174.50
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008 Communications with Client

05/06/25	AMUE	Prepare for (.4) and meet with M. Kemner and VeraCruz regarding privileged real estate issue (.5).	0.90	\$945.00
05/06/25	AMUE	Provide advice to client regarding impaired class votes.	0.80	\$840.00
05/06/25	MDL	Telephone conference with M. Kemner regarding exit facility collateral.	0.60	\$525.00
05/07/25	AMUE	Meeting with client and VeraCruz team regarding restricted assets.	1.00	\$1,050.00
05/08/25	AMUE	Meetings with P. Bongiovanni and A. Bardos regarding privileged issues concerning Committee's document requests (.9); meeting with M. Moore and M. Lee regarding same (.6); diligence privileged issue with Foley litigation team (T. Carlucci and J. Blease) regarding same (.7).	2.20	\$2,310.00
05/11/25	MCM	Email correspondence with client parties and Foley team regarding expert-retention issues in connection with confirmation hearings.	0.60	\$555.00
05/12/25	MDL	Telephone conference with A. Bardos and P. Bongiovanni regarding document collection and deposition preparation (only joined for part of the call).	0.70	\$612.50
05/13/25	AMUE	Communication with D. Flanagan regarding deposition preparation (.3); communication with R. Medeiros regarding privileged discovery matter (.2).	0.50	\$525.00

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05/13/25	AMUE	Communications with client regarding privileged discovery matter concerning document production.	0.50	\$525.00
05/13/25	MCM	Conference call with M. Kemner regarding expert retention issues (.5); email correspondence in response to questions and analysis of same (.5).	1.00	\$925.00
05/13/25	SJM	Draft email to client regarding results of hearing on discovery motions.	0.70	\$612.50
05/15/25	SJM	Call with client regarding real estate issues.	0.50	\$437.50
05/15/25	SJM	Call with A. Bardos regarding various privileged case issues.	0.30	\$262.50
05/16/25	MDL	Telephone conference with A. Bardos regarding possible compromise on expert retention applications.	0.20	\$175.00
05/18/25	AMUE	Communication with client leadership regarding privileged matter concerning discovery.	0.50	\$525.00
05/19/25	AMUE	Meeting with R. Medeiros regarding privileged matter concerning discovery (.8); communication with M. Lee and M. Moore to debrief from meeting with R. Medeiros (.4).	1.20	\$1,260.00
05/20/25	MDL	Meet with D. Flanagan and A. Bardos to prepare for their depositions.	4.60	\$4,025.00
05/21/25	AMUE	Meeting with M. Kemner, Bishop Barber, T. Carlucci, E. Ridley and A. Bardos regarding privileged matter concerning discovery (the latter three/partial) (7.0); prepare for meeting (1.0); debrief with M. Kemner regarding privileged matter (.6).	8.60	\$9,030.00
05/21/25	MDL	Meet with M. Kemner and Bishop Barber to discuss supplemental interrogatory responses and deposition preparation (only attended part of meeting).	2.00	\$1,750.00
05/22/25	AMUE	Communication with M. Kemner regarding discovery responses and privileged issue related thereto.	0.40	\$420.00
05/23/25	AMUE	Multiple communications with client regarding privileged issue concerning discovery and direct communications regarding same.	1.00	\$1,050.00

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05/23/25	MCM	Email correspondence with client parties regarding discovery issues.	0.50	\$462.50
05/23/25	MDL	Email exchange with Bishop Barber, R. Medeiros, and M. Kemner regarding collection of documents related to abuse claims.	0.50	\$437.50
05/23/25	MDL	Telephone conference with M. Kemner regarding document production and custodian issues.	0.50	\$437.50
05/25/25	MCM	Conference call with client parties regarding discovery matters and next steps (.6); analyze response to client inquiry from client parties regarding discovery matters (.5).	1.10	\$1,017.50
05/25/25	MDL	Telephone conference with M. Kemner and M. Moore regarding specific unsecured claims and related documentation issues.	0.50	\$437.50
05/26/25	AMUE	Draft communication concerning privileged issue concerning priest.	1.00	\$1,050.00
05/29/25	MDL	Telephone conference with M. Kemner regarding document production and privilege issues.	0.30	\$262.50
05/30/25	AMUE	Revisions to outline to prepare client witness for deposition.	1.20	\$1,260.00
05/30/25	AMUE	Review documents concerning privileged issue for discussion with client leadership.	1.80	\$1,890.00
05/30/25	JRBL	Telephone conference with R. Medeiros regarding case strategy.	0.80	\$1,100.00
Task Total:			37.00	\$36,715.00

011 Cash Management

05/07/25	AMUE	Meeting with A. Bardos and VeraCruz team regarding cash management (.5) and review cash forecast information (.5).	1.00	\$1,050.00
05/07/25	AMUE	Analyze cash forecast to respond to Committee's questions about the forecast.	1.10	\$1,155.00
05/07/25	MDL	Meeting with VeraCruz and A. Uetz to discuss cash forecast and documents Committee requests with respect to same.	0.50	\$437.50

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05/21/25	SJM	Draft notice to counsel for Committee and U.S. Trustee regarding transfers of donation proceeds to parishes.	0.70	\$612.50
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Task Total:	3.30	\$3,255.00
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016 General Case Strategy (includes team calls)

05/04/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$540.00
05/05/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.80	\$540.00
05/05/25	MRL	Finalize review of pending dioceses cases to provide an update on their status to the Foley team.	0.40	\$270.00
05/07/25	EPK	Review the U.S. Trustee's letter filed in response to the BRG data breach notice.	0.10	\$87.50
05/08/25	MCM	Analysis of materials related to BRG data breach and related issues (.7); telephone conference with counsel for attorney for another diocese regarding same (.2).	0.90	\$832.50
05/08/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.50	\$337.50
05/09/25	MCM	Continue analysis of issues relating to BRG data breach and potential impact on RCBO bankruptcy case.	0.60	\$555.00
05/09/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.30	\$202.50
05/09/25	SJM	Call with M. Lee regarding Class 6 claims and discovery issues.	0.40	\$350.00
05/13/25	JRBL	Communications with A. Uetz regarding privileged communications with investigator (.1); locate engagement letter and invoices with reports (1.2).	1.30	\$1,787.50

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05/13/25	SJM	Call with M. Lee regarding results of discovery hearing (.2); call with M. Thomas regarding next steps on discovery in light of hearing results (.6); analyze issues regarding same (.8); email to case team regarding same (.4); email to team regarding Committee application to employ expert on restricted assets and concerns with same (.3).	2.30	\$2,012.50
05/14/25	MRL	Email correspondence regarding the weekly email to send to the client.	0.20	\$135.00
05/14/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.70	\$472.50
05/15/25	GSG	Review research regarding restricted assets and Committee arguments (2.); correspondence with S. Moses regarding canon law and restricted assets (.1).	0.30	\$315.00
05/15/25	MRL	Update the calendar of the confirmation process for the Foley team.	0.20	\$135.00
05/19/25	MDL	Strategize with M. Moore regarding privileged real estate matter.	0.20	\$175.00
05/22/25	AMUE	Prepare for (.3) and meeting with L. Glahn regarding privileged issue concerning sexual abuse claims (.4).	0.70	\$735.00
05/22/25	LFG	Call with A. Uetz regarding confidential matters (.4); follow up on same (.6); edit audit information for R. Medeiros (1.2).	2.20	\$2,640.00
05/23/25	GSG	Correspondence with D. Flanagan and L. Oberempt regarding restricted funds and motions to dismiss (.2); final review of motions to dismiss (.5).	0.70	\$735.00
05/23/25	TFCA	Review numerous emails regarding privileged matters (.5); telephone call with A. Uetz and M. Lee regarding same (.2); review email follow-up regarding same (.2).	0.90	\$1,237.50
05/25/25	TFCA	Review email regarding P. Glaesner response and provide comments regarding same.	0.30	\$412.50
05/27/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.90	\$607.50

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05/28/25	WD	Attention to pulling filed papers from various dockets and communications with M. Berg regarding same.	0.30	\$130.50
05/29/25	WD	Attention to pulling filed papers from various dockets and communications with M. Berg regarding same.	0.30	\$130.50
05/30/25	GSG	Correspondence with L. Oberempt regarding deposition preparation and related issues (.3); correspondence with D. Flanagan and A&M regarding restricted assets call (.3); telephone conference with S. Moses regarding expert issues (.2).	0.80	\$840.00
05/30/25	MCM	Conference call with Foley team regarding case status and next steps.	0.80	\$740.00
05/30/25	TFCA	Review numerous emails regarding privileged issue (.7); review emails from M. Moore regarding same with documents (.5) telephone call with P. Glaesner regarding strategy regarding privilege-related issues regarding internal report (.5).	1.70	\$2,337.50
05/31/25	MDL	Correspondence with D. Flanagan regarding buyer inquiry into Santa Maria property.	0.10	\$87.50
05/31/25	MDL	Correspondence with R. Manns (Norton Rose Fulbright) regarding RCWC building at Santa Maria parish campus.	0.10	\$87.50
05/31/25	TFCA	Review numerous emails regarding privileged issue (.4); provide comments regarding same (.3); review petition sent by M. Kemner regarding same (1.0); emails to group regarding same (.2); telephone call with J. Blease regarding employment angle regarding same (.3); emails with M. Lee regarding cross-prep (.2); participate in call with Foley team regarding privilege analysis regarding privileged matter (1.2); review documents forwarded by M. Moore (1.0); telephone call with P. Glaesner regarding privileged matter (.5).	5.10	\$7,012.50
Task Total:			24.90	\$26,481.00

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017 Hearings and Court Matters

05/07/25	AMUE	Attend status conference (partial).	1.00	\$1,050.00
05/07/25	AMUE	Prepare for status conference (.8) including team meeting (.5).	1.30	\$1,365.00
05/07/25	MDL	Participate in meeting with Foley team to prepare for potential arguments to be raised at status conference (partial).	0.30	\$262.50
05/07/25	SJM	Call with G. Goodman and A. Uetz regarding approach to status conference hearing (.3); prepare for status conference hearing (.5).	0.80	\$700.00
05/07/25	SJM	Attend adversary proceeding status conference.	1.60	\$1,400.00
05/12/25	AMUE	Prepare for Court status conference with Foley team.	1.00	\$1,050.00
05/12/25	SJM	Email to case team regarding approach to 5/13 hearing (.4); meeting with case team regarding same (.9).	1.30	\$1,137.50
05/13/25	AMUE	Prepare for (.8) and appearance at hearing on motion for protective order and motion to quash (partial) (1.5).	2.30	\$2,415.00
05/13/25	MCM	Attend status conference on BRG data breach, discovery motions in connection with confirmation, and oral ruling on motions to allow late-filed claims in RCBO and Franciscan Friars bankruptcy cases.	2.00	\$1,850.00
05/13/25	MDL	Attend portion of hearing on pending discovery motions.	1.60	\$1,400.00
05/13/25	SJM	Attend hearing on discovery motions and other matters (2.0); follow up on same (.7).	2.70	\$2,362.50
05/13/25	SJM	Continue to prepare for hearing on discovery motions.	1.80	\$1,575.00
05/29/25	AMUE	Revisions to reply brief in support of motion to amend interim compensation procedures order.	1.00	\$1,050.00
Task Total:			18.70	\$17,617.50

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018 Non-Bankruptcy Litigation

05/05/25	EPK	Email correspondence with J. Leito of NRF regarding third and final request for schools pleadings and related documents.	0.10	\$87.50
05/06/25	EPK	Email correspondence with J. Leito of NRF and the Murphy Pearson team regarding background information relating to remaining subset of schools-related abuse cases coordinated in JCCP 5108 (.3); coordinate with K. Farrar regarding information relating to same (.2).	0.50	\$437.50
05/07/25	EPK	Close review of summary of remaining schools actions and factual background prepared by J. Leito of NRF (.8); conference call with counsel to RCWC (NRF team and Murphy Pearson) to discuss same (.6).	1.40	\$1,225.00
05/09/25	EPK	Email correspondence with T. Halloran of Murphy Pearson regarding responses to any complaints involving RCWC (.1); email correspondence with D. Zamora regarding Plaintiffs' motions in limine (.1).	0.20	\$175.00
05/14/25	EPK	Email correspondence with California counsel to RCWC regarding procedural posture of schools actions and counsel substitution issues (.3); confer with K. Farrar regarding same (.4); review schools actions listed on the Foley tender list (.2); review updated list of cases prepared by K. Farrar (.1).	1.00	\$875.00
05/19/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding non-filing of motion or adversary proceeding to extend the stay to RCWC and the schools.	0.30	\$262.50
05/28/25	EPK	Review the joint case management statement filed in JCCP 5108 on May 23, 2025 (.2); virtually attend case management conference in the JCCP 5108 via Zoom (.9).	1.10	\$962.50
05/29/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding issues raised at yesterday's JCCP 5108 case management conference (.1); call with D. Zamora to discuss same further (.2); evaluate stay-related issues to be addressed at the next case management conference (.1).	0.40	\$350.00

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05/30/25	EPK	Email correspondence with D. Zamora of Weintraub Tobin regarding transcript of the May 28, 2025 JCCP 5108 case management conference (.1); email correspondence with S. Moses regarding same and related stay issues (.2).	0.30	\$262.50
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Task Total:	5.30	\$4,637.50
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019 Non-Working Travel

05/29/25	SJM	Travel to Eugene, Oregon for Judge Hogan deposition.	4.10	\$3,587.50
05/30/25	SJM	Return travel from Eugene, Oregon following Judge Hogan deposition.	3.20	\$2,800.00

Task Total:	7.30	\$6,387.50
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020 Retention/Billing/Fee Applications for Debtor Professionals

05/02/25	TND	Email to M. Moore on expert witness retention.	0.10	\$80.00
05/05/25	TND	Review draft order approving interim fee statements for accuracy based on agreements with fee examiner.	0.30	\$240.00
05/09/25	TND	Begin preparation of information for April Foley fee statement.	0.70	\$560.00
05/10/25	TND	Further preparation of information for April Foley fee statement.	0.40	\$320.00
05/11/25	MDL	Analyze Committee application to retain law professor to opine on insurance assignment.	0.10	\$87.50
05/12/25	TND	Further preparation of April fee statement.	1.90	\$1,520.00
05/13/25	JCH	Prepare certificate of no objection to Foley March 2025 monthly fee statement.	0.50	\$165.00
05/13/25	TND	Further work on April fee statement to ensure compliance with U.S. Trustee guidelines.	0.20	\$160.00
05/16/25	MDL	Strategize with M. Moore and A. Uetz regarding compromise on expert retention applications and Committee 30(b)(6) issues.	0.20	\$175.00

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05/16/25	MDL	Telephone conference with B. Weisenberg regarding hearing on motion to amend interim compensation order.	0.10	\$87.50
05/16/25	MDL	Email exchange with M. Kaplan regarding compromise on retention applications.	0.20	\$175.00
05/18/25	MDL	Analyze proposed form of order approving Klomprens retention application.	0.10	\$87.50
05/19/25	TND	Further preparation of April Foley fee statement to ensure compliance with U.S. Trustee guidelines.	0.20	\$160.00
05/20/25	MCM	Work on expert retention issues for confirmation.	0.40	\$370.00
05/20/25	TND	Prepare Denise Martin retention papers.	1.80	\$1,440.00
05/21/25	MCM	Attention to retention issues regarding expert witness in connection with confirmation.	0.40	\$370.00
05/21/25	TND	Discussion with M. Moore regarding NERA retention (.3); email to NERA regarding connections check (.1); further preparation of April monthly fee statement to ensure compliance with U.S. Trustee guidelines (.7).	1.10	\$880.00
05/22/25	TND	Further preparation of April Foley fee statement to ensure compliance with U.S. Trustee guidelines (.8); call to I. Velikova regarding NERA retention (.1).	0.90	\$720.00
05/23/25	TND	Review information for Martin retention.	0.20	\$160.00
05/27/25	AMN	Review Debtor's motion to amend interim compensation procedures (.4); review Committee objection to same and related exhibits (.4); call with A. Uetz regarding response to Committee objection (.2); review correspondence from A. Uetz and client's comments on Committee objection (.5).	1.50	\$1,575.00
05/27/25	SJM	Emails to Debtor professionals regarding interim fee applications.	0.30	\$262.50
05/28/25	AMN	Draft reply in support of motion to amend compensation procedures (2.0); discuss research related to the reply with M. Berg (1.0); discuss case status with M. Lee (.5); consider other pleadings in connection with reply brief arguments (.5).	4.00	\$4,200.00

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05/28/25	JCH	Prepare draft of Foley monthly fee statement for April 2025 (.5); begin preparation of draft of Foley Sixth Interim Fee Application (2.0).	2.50	\$825.00
05/28/25	JCH	Prepare shell reply in support of Debtor's motion to amend interim compensation procedures.	0.50	\$165.00
05/28/25	MCM	Attention to retention issues concerning expert witness in connection with confirmation hearings.	0.40	\$370.00
05/28/25	MDL	Telephone conference with A. Nann regarding factual support for reply brief in support of motion to amend interim compensation order.	0.50	\$437.50
05/28/25	MWBE	Research for motion regarding professionals' fees per A. Nann.	2.70	\$1,620.00
05/28/25	TND	Discussion of Martin retention application with team.	0.20	\$160.00
05/29/25	AMN	Revise reply in support of motion to amend compensation procedures (3.5); discuss research related to the reply with M. Berg (.5); correspondence with A. Uetz and S. Moses regarding revisions to and finalizing the reply (.5); review further revised reply brief (.4).	4.90	\$5,145.00
05/29/25	AMUE	Finalize monthly fee statement.	1.00	\$1,050.00
05/29/25	MCM	Review retention documents in connection with expert witness for confirmation.	0.70	\$647.50
05/29/25	MDL	Revise reply brief in support of motion to amend interim compensation order.	0.50	\$437.50
05/29/25	MWBE	Attention to research for motion regarding amended professional fee procedures.	1.50	\$900.00
05/29/25	MWBE	Follow up with A. Nann regarding research on holdback percentages.	0.10	\$60.00
05/29/25	TND	Further preparation of April Foley fee statement to ensure compliance with U.S. Trustee guidelines (.5); further preparation of expert witness retention pleadings (.6).	1.10	\$880.00
05/30/25	AMN	Correspondence regarding Committee surreply regarding motion to amend interim compensation procedures (.2) and review of same (.3).	0.50	\$525.00
05/30/25	JCH	Finalize and file Foley and A&M monthly fee statements for April 2025.	0.80	\$264.00

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05/30/25	MRL	Review email correspondence from the Foley team regarding the employment of Denise Martin.	0.20	\$135.00
05/30/25	MWBE	Attention to motion regarding amended professional fee procedures.	0.10	\$60.00
05/30/25	SJM	Revise reply in support of motion to amend interim compensation procedures.	1.20	\$1,050.00
05/30/25	SJM	Review Committee motion to file sur-reply on motion to amend interim compensation (.4); email to team regarding same (.1).	0.50	\$437.50
05/30/25	TND	Finalize Foley fee statement for filing (.6); email to A&M regarding filed statement (.1); review connections check from expert (.4); prepare exhibit on connections for application (.3); calls and emails with I. Velikova regarding expert retention (.4); email correspondence with A. Bardos regarding retention and declaration (.3).	2.10	\$1,680.00
Task Total:			37.60	\$30,644.00

021 Retention/Fee Applications: Ordinary Course Professionals

05/01/25	TND	Analyze payment timing of OCP payments under current OCP orders.	0.30	\$240.00
05/19/25	TND	Analyze issues related to payment timing for OCPs.	0.50	\$400.00
05/20/25	TND	Analyze issues related to payment timing for OCPs (.3); email correspondence with Committee counsel and U.S. Trustee on M. Kemner April 2025 invoice (.2).	0.50	\$400.00
Task Total:			1.30	\$1,040.00

022 Retention/Fee Applications: Other Professionals

05/04/25	SJM	Prepare omnibus order on fee applications.	1.30	\$1,137.50
05/07/25	SJM	Email to client regarding March monthly fee statements.	0.60	\$525.00
05/08/25	TND	Email correspondence with A. Fernandez regarding next interim fee application filings.	0.10	\$80.00

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05/09/25	SJM	Respond to fee examiner regarding order approving fees of fee examiner's firm.	0.20	\$175.00
05/12/25	SJM	Analyze Committee application to employ expert on religious liberty issues (.3); email to team regarding same (.1); response to M. Lee regarding procedure for objections (.1).	0.50	\$437.50
05/13/25	MDL	Evaluate legal basis for objection to retention of Committee experts who plan to testify as to legal principles.	1.20	\$1,050.00
05/13/25	MDL	Strategize with A. Uetz and T. Dolcourt regarding objection to retention of Committee experts who plan to testify as to legal principles.	0.40	\$350.00
05/13/25	MDL	Telephone conference with M. Plevin (Plevin Turner), B. Curet (SPCC), and T. Jacobs (PHRD) regarding history with proposed Committee expert witnesses.	0.50	\$437.50
05/13/25	MDL	Email exchange with M. Plevin (Plevin Turner), B. Curet (SPCC), and T. Jacobs (PHRD) regarding history with proposed Committee expert witnesses.	0.20	\$175.00
05/13/25	TND	Call with M. Lee and A. Uetz on objections to Committee retention of certain experts (.2); research on expert witness issues (1.6); call with M. Lee and counsel for insurers regarding same (.4) (partial).	2.20	\$1,760.00
05/14/25	MDL	Strategize regarding objection to Committee expert witnesses testifying as to legal issues.	0.60	\$525.00
05/14/25	TND	Research for objections to retention of certain experts by Committee.	2.90	\$2,320.00
05/15/25	TND	Further research on legal standards for objections to Committee's proposed expert witnesses (1.8); prepare legal standard section for objections (1.6).	3.40	\$2,720.00
05/16/25	ERR	Review Stempl materials and retention.	1.10	\$1,210.00
05/16/25	MCM	Conference call with Foley team regarding Committee retention of various expert witnesses and potential resolution of Debtor objections to same.	0.60	\$555.00
05/16/25	TND	Review Klomprens retention application (.2); draft reservation of rights regarding same (.5).	0.70	\$560.00

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05/18/25	TND	Review proposed redline order on Klomprens retention application to ensure appropriate reservation of rights for Debtor.	0.10	\$80.00
05/19/25	MDL	Analyze notice of withdrawal of Lipson and Stemple applications.	0.10	\$87.50
05/19/25	MDL	Evaluate Klomprens retention application.	0.20	\$175.00
05/21/25	SJM	Confirm amounts payable to professionals under interim fee order (1.0); draft email to client regarding same (.4); draft email to client regarding monthly fee statements (.4).	1.80	\$1,575.00
05/22/25	TND	Email correspondence with mediators regarding upcoming interim fee app filings.	0.40	\$320.00
05/23/25	TND	Email correspondence with R. Newsome regarding interim fee applications.	0.10	\$80.00
05/25/25	SJM	Analyze email from D. Flanagan regarding detailed responses to Committee objection to motion to amend interim compensation (.4); review Committee objection (.5); email to case team regarding approach (.3).	1.20	\$1,050.00
05/29/25	JCH	Update spreadsheet with fees and expenses for all case professionals.	0.50	\$165.00
05/29/25	SJM	Email correspondence with client regarding status of professional fee payments (.6); telephone call with Committee counsel regarding same (.2).	0.80	\$700.00
05/30/25	JCH	Prepare chart of interim payments due to all case professionals for April 2025 and email same to S. Moses.	0.50	\$165.00
05/30/25	MCM	Revise retention application for NERA consulting as expert witness in connection with confirmation (.3); email correspondence regarding filing and finalization of same (.3).	0.60	\$555.00
05/31/25	TND	Revise interim fee app for the Gallagher Group (.4); correspondence with A. Fernandez regarding same (.2).	0.60	\$480.00
Task Total:			23.40	\$19,450.00

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023 Schedules/ Statement of Financial Affairs

05/13/25	MCM	Conference call with various parties regarding proposed Committee expert retentions and related issues (.5); analysis of filed retention applications (.4).	0.90	\$832.50
05/19/25	EPK	Review email from P. Bongiovanni regarding proposed amendment to RCBO's Schedules of Liabilities.	0.10	\$87.50
05/22/25	EPK	Email correspondence with M. Moore and S. Moses regarding potential amendment to RCBO's Schedules of Liabilities.	0.10	\$87.50
Task Total:			1.10	\$1,007.50

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

05/13/25	MCM	Analysis of BRG diocesan data breach issue and U.S. Trustee response to same (.7); email correspondence with BRG and Committee regarding same (.3); conference call with Committee counsel regarding BRG access to abuse claims (.3).	1.30	\$1,202.50
05/16/25	EPK	Email correspondence with D. Flanagan of VeraCruz regarding April 2025 MOR draft and supporting documents (.1); email correspondence with A. Uetz regarding same (.1).	0.20	\$175.00
05/19/25	EPK	Review preliminary draft of the April 2025 MOR package (.4); comment on same (.1); email correspondence with D. Flanagan of VeraCruz regarding comments to the April 2025 MOR package (.1); coordinate with A. Uetz regarding financial information reflected in April 2025 MOR and timing for filing same (.1); email correspondence with A. Bardos regarding final approval of April 2025 MOR for filing (.1); coordinate with J. Harrison regarding filing and service of same (.1).	0.90	\$787.50
05/19/25	JCH	File monthly operating report for April 2025 and circulate filed copy of same to client group and Foley group.	0.50	\$165.00

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05/21/25	EPK	Email correspondence with D. Flanagan of VeraCruz and K. Farrar regarding April 2025 MOR supplements to be transmitted to the BRG team.	0.10	\$87.50
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Task Total:	3.00	\$2,417.50
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026 Unsecured Creditor Issues/Communications/Meetings

05/02/25	AMUE	Meeting with B. Weisenberg regarding cash forecast and confirmation issues (.4); communications with D. Flanagan regarding cash forecast (.4); review revisions to exhibit regarding plan funding (.9).	1.70	\$1,785.00
05/05/25	MDL	Email exchange with B. Weisenberg regarding status of redaction of draft adversary complaint.	0.10	\$87.50
05/06/25	AMUE	Respond to email from B. Weisenberg regarding confirmation matters.	0.30	\$315.00
05/06/25	MDL	Email correspondence with B. Weisenberg (Lowenstein) regarding redactions for Committee's proposed adversary complaint against RCWC, RCC, and Adventus.	0.60	\$525.00
05/06/25	MDL	Email exchange with J. Hogan regarding information requests from Unknown Abuse Claims Representative.	0.10	\$87.50
05/07/25	MDL	Meeting with Lowenstein and BRG to discuss cash forecast.	0.80	\$700.00
05/08/25	AMUE	Meet and confer with Lowenstein team regarding discovery issues.	0.50	\$525.00
05/08/25	MDL	Strategize with Foley team regarding Unknown Abuse Claims Representative position on plan and amount set aside for unknown abuse claims.	0.30	\$262.50
05/08/25	MDL	Telephone conference with Unknown Abuse Claims Representative regarding plan details, unsecured creditor recoveries, and deadlines for voting and other milestones.	1.20	\$1,050.00
05/13/25	AMUE	Telephone meeting (.3) and email communication with B. Weisenberg (.2) regarding Committee's expert retention applications.	0.50	\$525.00

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05/13/25	SJM	Call with counsel for Franciscan Friars regarding case status.	0.20	\$175.00
05/14/25	MCM	Email correspondence with Committee counsel regarding late-filed claim solicitation issue and voting summary dated Monday, May 12.	0.50	\$462.50
05/16/25	MDL	Telephone conference with M. Kaplan regarding possible compromise on expert retention applications.	0.50	\$437.50
05/21/25	MDL	Emails with M. Kaplan regarding meeting among experts to discuss property inspections.	0.20	\$175.00
05/23/25	MDL	Correspondence with C. Restel and M. Kaplan (both of Lowenstein) regarding inspection schedule and revised property list.	0.10	\$87.50
05/30/25	MDL	Telephone conference with M. Kaplan regarding open discovery issues and deposition considerations.	0.50	\$437.50
Task Total:			8.10	\$7,637.50

027 Real Estate and Real Property Issues

05/02/25	TND	Review email on latest status of negotiations on privileged real estate matter.	0.10	\$80.00
05/05/25	SJM	Attend meeting with potential real estate consultant.	1.30	\$1,137.50
05/14/25	TND	Attend client call on privileged real estate matters.	0.80	\$640.00
05/17/25	SJM	Work on settlement agreement with CCCEB related to cathedral property.	1.60	\$1,400.00
05/20/25	SJM	Email to J. Barglow regarding deed for CCCEB transfer (.4); work on settlement agreement with CCCEB (4.1).	4.50	\$3,937.50
05/21/25	JBA	Prepare grant deed for 2121 Harrison Street (.3); review prior vesting deed and title report in connection with same (.2); research documentary transfer tax exemptions in connection with same (.9).	1.40	\$1,610.00

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05/21/25	SJM	Further revisions to CCCEB Settlement Agreement (3.2); telephone call with J. Barglow regarding CCCEB settlement (.3); review California and federal law regarding exemption from transfer taxes (.8); revise draft deed (.2).	4.50	\$3,937.50
05/23/25	SJM	Prepare draft bill of sale for CCCEB transaction (.8); prepare draft assignment of contracts for CCCEB transaction (.6); revise draft settlement agreement for CCCEB transaction (.4).	1.80	\$1,575.00
05/29/25	SJM	Analyze email from P. Bongiovanni regarding matters related to CCCEB settlement transaction.	0.60	\$525.00

Task Total: 16.60 \$14,842.50

028 Tort Claims

05/05/25	EPK	Review email correspondence from Judge Hogan's case manager regarding request for spreadsheet of abuse claims and walkthrough of proposed chapter 11 plan.	0.10	\$87.50
05/20/25	SJM	Review Class 6 claims (1.2); email to D. Flanagan regarding insurance SIR issues related to same (.4); call with M. Lee regarding same (.2); call with L. Katz regarding Macias claim (.4); email to case team regarding analysis of claims (.6).	2.80	\$2,450.00

Task Total: 2.90 \$2,537.50

031 Insurance Issues (coverage, includes adversary proceeding)

05/01/25	ERR	Review status of negotiations with insurers.	0.50	\$550.00
05/01/25	MR	Perform QC-level review of documents for potential production to insurers in insurance coverage action.	0.70	\$556.50
05/02/25	ERR	Review issues raised with mediators regarding insurance contribution.	0.50	\$550.00
05/02/25	MDL	Email exchange with D. Romanski regarding insurance certificates and renewal of core policies.	0.20	\$175.00

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05/02/25	MR	Perform QC-level review of documents for potential production to insurers in insurance coverage action.	1.60	\$1,272.00
05/03/25	MR	Perform QC-level review of documents for potential production to insurers in insurance coverage action.	1.10	\$874.50
05/06/25	AMUE	Analyze privileged issue concerning possible insurer settlement.	6.00	\$6,300.00
05/07/25	AMUE	Analyze open discovery matters regarding coverage litigation.	0.50	\$525.00
05/07/25	ERR	Review status of discovery from Committee.	0.40	\$440.00
05/08/25	EPM	Draft supplemental written discovery to insurers.	1.00	\$840.00
05/08/25	ERR	Review insurer contribution issues regarding plan confirmation.	0.50	\$550.00
05/08/25	MDL	Email exchange with Arthur J. Gallagher regarding policies requested by U.S. Trustee against list and certificates provided by Arthur J. Gallagher.	0.30	\$262.50
05/08/25	MDL	Email correspondence with U.S. Trustee's office regarding insurance certificates.	0.10	\$87.50
05/08/25	MDL	Evaluate list of policies requested by U.S. Trustee against list and certificates provided by Arthur J. Gallagher.	0.50	\$437.50
05/08/25	MDL	Telephone conference with A. Uetz, M. Moore, and E. Ridley regarding insurance settlement options.	0.60	\$525.00
05/09/25	EPM	Draft written discovery (1.4); conference call with M. Roberts regarding status of open discovery items (.6).	2.00	\$1,680.00
05/09/25	KAFA	Communications with M. Roberts and E. Mazzocco regarding insurance coverage action protective order for AHA and production of Clergy III insurance settlement agreement (.2); update document production index (.1).	0.30	\$135.00

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05/09/25	MR	Perform QC-level review of documents for potential production to insurers in insurance coverage action (1.4); telephone communications with E. Mazzocco regarding strategy for document productions to insurers in insurance coverage action (.5).	1.90	\$1,510.50
05/12/25	ERR	Review issues regarding Stempl engagement.	0.50	\$550.00
05/12/25	MR	Perform QC-level review of documents for potential production to insurers in insurance coverage action.	1.60	\$1,272.00
05/13/25	ERR	Review case status and issues regarding retention by Committee of Stempl.	0.50	\$550.00
05/13/25	MR	Perform QC-level review of documents for potential production to insurers in insurance coverage action.	2.60	\$2,067.00
05/14/25	MR	Perform QC-level review of documents for potential production to insurers in insurance coverage action.	2.30	\$1,828.50
05/15/25	MR	Perform additional QC-level review of documents for potential production to insurers in insurance coverage action.	3.80	\$3,021.00
05/16/25	MR	Complete QC-level review of documents for potential production to insurers in insurance coverage action, including redactions of same (2.1); teleconference with J. Breall regarding productions of documents to insurers (.2).	2.30	\$1,828.50
05/18/25	MR	Complete creation of QC-reviewed supplemental document production set in insurance coverage action.	0.30	\$238.50
05/19/25	AMUE	Analyze open insurance discovery issues in advance of meet and confer in order to provide advice to Foley team regarding same.	0.80	\$840.00

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05/19/25	EPM	Review insurer correspondence regarding document production and responses and objections to document requests (.9); conference call with M. Roberts regarding same (.2); meet and confer with Pacific entities regarding document requests and RCBO productions (1.0); conference call with M. Roberts regarding same (.3); revise summary of meet and confer call (.6); conference call with E. Ridley regarding status of document discovery (.3).	3.30	\$2,772.00
05/19/25	MR	Prepare for (.7) and attend meet and confer call with Pacific entities' counsel regarding discovery in insurance coverage action (1.0); telephone and email communications with E. Mazzocco in relation to same (.7); draft summary of points discussed and action items from same (.4).	2.80	\$2,226.00
05/21/25	EPM	Review status of document discovery (1.0); review insurer reservation of rights letters (.3); summarize correspondence from insurers and provide recommendation to team (1.0).	2.30	\$1,932.00
05/21/25	ERR	Communications with mediators regarding status of settlement discussions with insurers.	0.40	\$440.00
05/22/25	AAWT	Review documents for responsiveness and privilege for insurer request for production in adversary proceeding.	3.50	\$1,837.50
05/22/25	AMUE	Review communications received from insurers regarding discovery to provide advice to Foley team regarding response.	0.50	\$525.00
05/22/25	MR	Email communications with A. Uetz and E. Mazzocco regarding privileged matters relating to productions of documents to insurers in insurance coverage action.	0.30	\$238.50
05/23/25	AMUE	Strategize with E. Ridley regarding insurance settlement matters.	0.40	\$420.00
05/23/25	ERR	Communications with mediators, Foley team, and client regarding status of mediation negotiations with insurers.	1.80	\$1,980.00

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05/27/25	EPM	Respond to discovery-related correspondence from insurers (.4); communications with K. Farrar regarding same (.4); conference calls with S. Moses regarding same (1.2); draft correspondence to Pacific Insurers regarding discovery (1.1); conference call with M. Lee, E. Ridley, and S. Moses regarding document productions to insurers (1.1); quality control review of document production (.3).	4.50	\$3,780.00
05/27/25	ERR	Review status of productions to insurers vis a vis production to Committee.	0.70	\$770.00
05/27/25	ERR	Review status of settlement negotiations with insurers vis a vis mediators.	0.30	\$330.00
05/27/25	MDL	Telephone conference with Foley team regarding documents to be produced to insurers (only joined part of the call).	0.40	\$350.00
05/27/25	SJM	Meeting with E. Mazzocco and M. Lee regarding insurer document production matters (1.1); multiple calls with E. Mazzocco regarding same (.8); analyze issues regarding same (.7); email to case team regarding same (.3); emails to E. Mazzocco regarding written discovery responses to Committee (.4).	3.30	\$2,887.50
05/28/25	EPM	Review transcripts from District Court hearings (1.0); conference call regarding document review with M. Thomas and M. Roberts (1.0).	2.00	\$1,680.00
05/28/25	ERR	Review issues related to state of production to insurers.	0.50	\$550.00
05/28/25	MR	Attend strategy call with M. Thomas and E. Mazzocco regarding privileged matters relating to document productions (partial) (.7); further telephone communications with E. Mazzocco regarding document productions specific to insurance coverage action. (.3).	1.00	\$795.00
05/29/25	AAWT	Review documents for responsiveness and privilege for insurer request for production in adversary proceeding.	2.20	\$1,155.00

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05/29/25	EPM	Revise redactions to outgoing document production (1.7); analysis of outgoing document productions (1.2); conference call with E. Ridley regarding same (.5); call with S. Moses regarding same (.1).	3.50	\$2,940.00
05/29/25	ERR	Review status of productions in light of discovery requests by insurers.	0.60	\$660.00
05/29/25	MDL	Evaluate confidentiality issues with respect to production of documents to insurers.	0.50	\$437.50
05/30/25	EPM	Finalize document productions to insurers (1.5); conference call with M. Bevan regarding same (.2); revise redactions to outgoing document production (1.9).	3.60	\$3,024.00
05/30/25	ERR	Provide information to M. Kemner regarding Bishop Barber's deposition preparation.	0.50	\$550.00
05/30/25	KAFA	Update document production log with productions to insurers.	0.30	\$135.00
Task Total:			72.60	\$61,881.50

032 Rule 2004 Motions/Discovery/Subpoenas

05/01/25	AMUE	Communication with M. Thomas regarding discovery strategy (.5); review written discovery responses from the Committee and analyze for deficiencies (1.1).	1.60	\$1,680.00
05/01/25	JMT	Confer with team regarding the status of document collection (.4); analyze discovery to track production and document collection (2.3); confer with S. Moses concerning prior productions and what is needed to supplement production (.7).	3.40	\$2,975.00
05/01/25	MCM	Analysis of prior Debtor productions to Committee in context of discovery matters.	0.60	\$555.00
05/01/25	MR	Communicate with S. Moses regarding document productions to the Committee.	0.20	\$159.00

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05/01/25	MRM	Analyze materials related to previous document productions (2.1); compile information into singular document solely related to previous Committee productions (1.6); analyze documents produced to Committee to determine needed documents for supplemental production (7.0).	10.70	\$7,222.50
05/01/25	SJM	Call with M. Thomas regarding discovery and document production status (.9); verify documents produced that are responsive to current requests (1.6).	2.50	\$2,187.50
05/01/25	TND	Analyze issues related to priest subpoenas directed to individuals no longer at churches (.3); email with M. Thomas on how to address same (.2); communications with client team on outstanding questions on priest subpoenas (.3); emails to priests in response to inquiries on subpoenas (.4).	1.20	\$960.00
05/02/25	AMUE	Meeting with M. Thomas, S. Moses and R. Manns regarding discovery requests.	0.50	\$525.00
05/02/25	JMT	Draft witness disclosure (.4); continue identifying documents to collect for supplemental review and production (1.7); review conferral email regarding production from Committee and prepare for conferral with Committee regarding supplemental production (1.3).	3.40	\$2,975.00
05/02/25	MCM	Analysis of issues regarding offsite storage in context of document discovery.	0.60	\$555.00
05/02/25	MCM	Attention to discovery issues in connection with confirmation.	0.60	\$555.00
05/02/25	MRM	Document review of previous production to Committee to determine extent of production and need for supplemental production pursuant to Committee's document requests.	4.80	\$3,240.00
05/02/25	SJM	Call with M. Thomas, A. Uetz, and R. Manns regarding Committee discovery.	0.50	\$437.50
05/04/25	MRM	Analyze previous document production in connection with Committee's discovery to determine scope of supplemental production (4.8); draft analysis of findings for purposes of Monday's conferral (1.3).	6.10	\$4,117.50

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05/04/25	SJM	Attention to issues related to fact witness disclosures and status of discovery.	0.60	\$525.00
05/05/25	AMUE	Work on production of documents and witness matters.	4.50	\$4,725.00
05/05/25	AMUE	Prepare for (.6) and meet and confer with Lowenstein regarding discovery issues (.8).	1.40	\$1,470.00
05/05/25	JMT	Confer with opposing counsel regarding outstanding discovery issues (. 9); confer with team regarding document collection and identify the categories of documents that need to be collected for discovery responses (1.3).	2.20	\$1,925.00
05/05/25	KAFA	Communications with R. Stewart and M. Roberts regarding confidentiality designations of various documents previously produced to the Committee (due to the Committee wanting to file an amended complaint trying to substantively consolidate RCWC into RCBO).	0.60	\$270.00
05/05/25	MCM	Review email correspondence regarding discovery conferral matters (.3); confer with M. Thomas regarding outcome of conferral and next steps in discovery process (.3).	0.60	\$555.00
05/05/25	MDL	Participate in meet and confer with Committee counsel to discuss written discovery responses and discovery motions.	0.90	\$787.50
05/05/25	MRM	Analyze Committee's motion for protective order in connection with Debtor's discovery (1.1); research relevant case law in connection with the same (1.5).	2.60	\$1,755.00
05/05/25	RTST	Analyze RCBO-produced discovery documents to determine confidentiality designations and potential sealing of Committee's forthcoming amended complaint.	6.30	\$5,197.50
05/05/25	SJM	Analyze potential email custodians for email collection (.4); call with M. Thomas regarding document review (.6); review Committee motion for protective order (.7); email to A. Bardos regarding email collection (.2); email to Debtor IT regarding same (.1); work on document discovery issues (.6).	2.60	\$2,275.00

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05/05/25	SJM	Prepare for discovery meet and confer call (.5); participate in discovery meet and confer call (1.2); prepare notes regarding call (.2).	1.90	\$1,662.50
05/05/25	TND	Begin to review research needed for response to Committee objections on Committee member depositions.	1.10	\$880.00
05/06/25	AMUE	Outline response to Committee's motion for protective order (.4) and meeting with Foley team to develop strategy related to same (.5).	0.90	\$945.00
05/06/25	AMUE	Strategize regarding collection of certain responsive documents from various client representatives.	1.80	\$1,890.00
05/06/25	JCH	Prepare chart listing Committee's objections containing (1) the RFP or Rog number, (2) the full text of the request or Interrogatory number, and (3) the bases stated for the objection.	1.00	\$330.00
05/06/25	JMT	Confer with team regarding custodians and email collection (.7); draft search terms for email collection (1.6); analyze discovery responses and arguments to compel production of documents the Committee has objected to (1.2).	3.50	\$3,062.50
05/06/25	KAFA	Assist R. Stewart with analysis of confidentiality designations of various documents previously produced to the Committee.	0.30	\$135.00
05/06/25	MDL	Telephone conference with M. Thomas regarding meet and confer on Committee discovery motion and written responses and Debtor's position on Committee's motion for protective order.	0.20	\$175.00
05/06/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding meet and confer on Committee discovery motion and written responses.	0.10	\$87.50
05/06/25	MR	Per M. Lee request, provide summaries of discrete categories of documents previously produced in bankruptcy proceedings.	1.10	\$874.50
05/06/25	MRL	Draft search terms in response to the Committee's discovery requests.	1.20	\$810.00

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05/06/25	MRM	Draft response to Committee conferral email (.8); analyze findings from prior production in connection with response to the Committee for conferral (1.0).	1.80	\$1,215.00
05/06/25	RTST	Analyze RCBO-produced discovery documents to determine confidentiality designations and potential sealing of Committee's forthcoming amended complaint.	3.00	\$2,475.00
05/06/25	SJM	Call with M. Thomas regarding open discovery issues.	0.80	\$700.00
05/06/25	SJM	Call with T. Dolcourt regarding response to Committee motion for protective order (.5); analyze issue regarding email custodians based on specific document requests (.6); email to A. Uetz and M. Thomas regarding same (.2); assist with response to motion for protective order (.5).	1.80	\$1,575.00
05/06/25	TND	Call with A. Uetz and S. Moses regarding Committee protective order motion (.4); begin research on Committee discovery matters (3.3).	3.70	\$2,960.00
05/07/25	AMUE	Analyze certain discovery requests of the Committee to provide recommendation to client regarding same (contested requests).	1.90	\$1,995.00
05/07/25	AMUE	Prepare for (.4) and meet and confer with Lowenstein team regarding discovery issues (.5).	0.90	\$945.00
05/07/25	JMT	Confer with team regarding discovery and preparing for meet and confer (.5); confer with counsel for RCC and RCWC regarding discovery (.3); confer with team regarding data collection (1.4); work on indexing prior productions and document collection efforts (1.2); draft search terms for document collection (1.1); confer with VeraCruz regarding document collection (.6).	5.10	\$4,462.50
05/07/25	KAFA	Prepare analysis of San Francisco war room documents and JCCP-produced documents for M. Thomas.	0.60	\$270.00
05/07/25	MCM	Attention to issues concerning offsite storage locations for Debtor documents, including telephone conferences with client parties regarding same (1.0); email correspondence with Foley team regarding document collection and related issues to offsite storage (.7).	1.70	\$1,572.50

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05/07/25	MRL	Continue drafting search terms in response to the Committee's discovery requests (2.2); draft email to J. Thomas regarding the search terms (.4).	2.60	\$1,755.00
05/07/25	SJM	Multiple calls with M. Thomas regarding multiple discovery issues.	0.50	\$437.50
05/07/25	TND	Further research for response to Committee motion for protective order (2.1); begin drafting response (1.7).	3.80	\$3,040.00
05/08/25	AMUE	Revisions to objection to Committee's motion for protective order.	1.20	\$1,260.00
05/08/25	JMT	Continue indexing production and document collection (1.3); confer with K. Farrar concerning prior productions (.7); review documents for production (2.2); confer with VeraCruz regarding document collection (1.2).	5.40	\$4,725.00
05/08/25	KAFA	Prepare analysis of diligence tracker and Committee priority requests.	1.20	\$540.00
05/08/25	MCM	Analyze draft discovery responses to Committee discovery in connection with confirmation (.8); conference call with Foley team regarding same and next steps (.7); review documents in connection with offsite storage (.7).	2.20	\$2,035.00
05/08/25	MDL	Evaluate documents to be produced to Committee.	0.10	\$87.50
05/08/25	MDL	Telephone conference with Committee attorneys regarding meet and confer on discovery motions and responses.	0.60	\$525.00
05/08/25	MDL	Evaluate document production issues regarding previous productions and possible additional custodians.	1.00	\$875.00
05/08/25	MRL	Confer with J. Thomas regarding reviewing document for production (.4); analyze documents for production to the Committee (.6).	1.00	\$675.00
05/08/25	MWBE	Complete first draft of document regarding Committee objection per A. Uetz.	1.90	\$1,140.00
05/08/25	SJM	Respond to Committee regarding witness deposition schedule (.2); further email correspondence regarding scheduling of depositions (.4).	0.60	\$525.00

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05/08/25	SJM	Prepare for meet and confer call with Committee (.4); participate in meet and confer call (.6); call with M. Thomas and VeraCruz regarding VeraCruz email collection (partial) (.5); strategize with M. Thomas regarding open discovery issues (.3).	1.80	\$1,575.00
05/08/25	SJM	Revise response to Committee motion for protective order (2.6); email correspondence regarding same (.5).	3.10	\$2,712.50
05/08/25	TND	Further research for response to Committee protective order (2.6); further drafting of response (3.8).	6.40	\$5,120.00
05/09/25	AMUE	Finalize objection to Committee's motion for protective order, including communication with client regarding same.	1.10	\$1,155.00
05/09/25	EPK	Review deposition notices served by Keller Benvenuti Kim today.	0.20	\$175.00
05/09/25	JMT	Confer regarding discovery collection efforts (.6); draft corporate representative topics to Committee (.8); confer with VeraCruz regarding document collection (.7); continue to index discovery collection and review (2.4).	4.50	\$3,937.50
05/09/25	MDL	Strategize with S. Moses regarding opposition to Committee motion for protective order.	0.20	\$175.00
05/09/25	MDL	Revise response in opposition to Committee motion for protective order.	0.80	\$700.00
05/09/25	MRL	Continue analyzing documents for production to the Committee.	1.70	\$1,147.50
05/09/25	SJM	Further revisions to opposition to Committee motion for protective order.	0.90	\$787.50
05/09/25	TND	Finalize objection to motion for protective order from Committee.	1.30	\$1,040.00
05/10/25	MRL	Continue analyzing documents for production to the Committee.	0.90	\$607.50
05/11/25	MRL	Continue analyzing documents for production to the Committee.	1.90	\$1,282.50

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05/12/25	AMUE	Review email received from C. Dernbach (.2) and respond to same (.2) regarding discovery; analyze issue concerning offsite storage to provide advice to team regarding discovery matter (1.1); communications with Foley team to coordinate fact discovery depositions for each of our respective witnesses (.4) and review communications with Committee regarding same (.3); analyze restricted assets issue in order to respond to discovery requests regarding same (.9); provide direction to Foley team regarding collection of information from 84 parishes to respond to discovery requests in light of Committee's requests (1.2); prepare for court conference (.6).	4.90	\$5,145.00
05/12/25	EPK	Review Notice of Deposition served by Keller Benvenuti Kim on the Honorable Michael R. Hogan.	0.10	\$87.50
05/12/25	JMT	Confer with team about supplemental document collection (.4); draft conferral response to Committee concerning discovery (1.1); confer with team regarding hearing prep (.5); confer with client team regarding supplemental collection of documents requested by Committee (1.1); monitor document review and quality control the same (1.5).	4.60	\$4,025.00
05/12/25	MCM	Conference call with client parties regarding offsite storage and document repositories in connection with discovery requests (.6); analyze documents provided by client and determine next steps (.4).	1.00	\$925.00
05/12/25	MDL	Strategize with Foley team to strategize regarding hearing on discovery motions.	0.70	\$612.50
05/12/25	MDL	Email exchange with Lowenstein regarding responses to written discovery and deposition issues.	0.20	\$175.00
05/12/25	MDL	Email exchange with Committee counsel regarding production of documents by Bishop Barber and VeraCruz.	0.40	\$350.00
05/12/25	MRL	Continue analyzing documents for production to the Committee.	6.30	\$4,252.50

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05/12/25	MRM	Strategize in connection with discovery hearing and coordination in connection with document collection and review.	1.60	\$1,080.00
05/12/25	SJM	Prepare for hearing on Committee motion to quash and Debtor motion for protective order.	2.20	\$1,925.00
05/12/25	SJM	Work on document production issues (1.4); meeting with M. Thomas and client regarding final document collection for same (1.0).	2.40	\$2,100.00
05/12/25	TND	Correspondence with Foley team on outstanding discovery matters.	0.40	\$320.00
05/13/25	AMUE	Work on team's schedule for depositions to coordinate same with Committee (.5) and email exchanges with M. Kaplan regarding same (.6).	1.10	\$1,155.00
05/13/25	AMUE	Provide direction to Foley team regarding review of 400,000+ emails in order to comply with Committee discovery requests (1.2); provide comments to M. Thomas response to Committee regarding complaints about discovery responses (.4).	1.60	\$1,680.00
05/13/25	JMT	Continue working on document review and quality control (2.6); analyze prior productions and track document production in response to Committee's discovery requests (2.8).	5.40	\$4,725.00
05/13/25	MCM	Analysis of offsite data storage issues (.4); email correspondence with Foley team regarding same (.2).	0.60	\$555.00
05/13/25	MDL	Revise response to Committee emails claiming various discovery deficiencies.	0.30	\$262.50
05/13/25	MRL	Continue analyzing documents for production to the Committee (5.5); confer with J. Thomas regarding drafting deposition outlines for Committee members (.2).	5.70	\$3,847.50
05/13/25	MRM	Strategize in connection with ruling on discovery hearing and document collection from priests and parishes, in connection with the same.	2.10	\$1,417.50
05/13/25	SKHE	Communications with M. Thomas regarding document review.	0.70	\$451.50

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05/14/25	AAWT	Attend document review kick-off meeting to discuss review strategy and goals with assigning attorney and attorney team (.4); outline document review guidance on relevance, confidentiality, and privilege into quick-reference document to assist in review of documents (.3).	0.70	\$367.50
05/14/25	AMUE	Analyze privileged discovery issue related to Committee's requests for documents (1.4); meeting with Foley team to provide advice regarding same (partial) (.5); strategize with M. Thomas regarding requests for production directed to RCBO and collection of documents from churches/pastors (.5); analyze Court's ruling regarding Committee's motion to quash and Debtor's motion to quash subpoenas (.5).	2.90	\$3,045.00
05/14/25	HLAN	Discussion regarding document review and protocol.	0.50	\$355.00
05/14/25	JMT	Meet and confer regarding subpoena responses and other discovery responses (.7); confer with counsel for RCWC and RCC regarding subpoena response (.4); address questions and resolve issues regarding document review (.8); update team on status of document review (.6); index discovery and review documents (3.2).	5.70	\$4,987.50
05/14/25	KAFA	Prepare analysis for M. Thomas to assist with responses to the Committee's requests for documents to RCC, RCWC, and Adventus (1.3); communications with E. Khatchatourian and T. Halloran regarding responses to pleadings and discovery on behalf of RCWC and transmittal of additional files to NRF (.6); analysis and summary of additional cases listed by NRF for document transmittal (1.4).	3.30	\$1,485.00
05/14/25	MCM	Conference call with Foley team regarding discovery issues, including strategy with respect to offsite storage (partial) (.6); email and telephone communications with client parties regarding same (.5); review index of offsite storage to identify documents to pull immediately (.8); follow-up conference call with client parties regarding same and background of document retention (.6); call with M. Thomas regarding same (.4).	2.90	\$2,682.50

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05/14/25	MDL	Participate in meet and confer with Committee counsel and RCWC/RCC/Adventus counsel regarding discovery responses and deposition schedule.	0.50	\$437.50
05/14/25	MDL	Discussion with J. Leito and R. Manns (Norton Rose Fulbright) regarding deposition schedule and preparations.	0.40	\$350.00
05/14/25	MDL	Strategize with Foley team regarding document production and privilege review.	1.80	\$1,575.00
05/14/25	MRL	Email correspondence with litigation staff regarding production of documents (.5); draft notices of deposition for Committee members (.9); email correspondence with J. Thomas regarding same (.2); call with Foley team regarding reviewing documents for custodians for production to the Committee (.4).	2.00	\$1,350.00
05/14/25	MRM	Calls to discuss document review and collection (2.0); call with litigation support staff in connection with review space (1.0); coordination with litigation support staff in connection with reproducing documents to Non-Debtor Catholic Entities (1.3).	4.30	\$2,902.50
05/14/25	SJM	Meeting with Foley team regarding approach to confirming documents at parish level in light of results of May 13 hearing and other discovery issues (.9); Foley meeting regarding status of document review and production (.6).	1.50	\$1,312.50
05/14/25	SKHE	Review documents for responsiveness and issues for production to Committee.	2.50	\$1,612.50
05/14/25	SMP	Review client documents for production.	4.40	\$3,410.00
05/14/25	TND	Call with Foley team on outstanding discovery issues (.8); review issues related to discovery responses (.6); prepare draft email to priests with update on recent court rulings (.3).	1.70	\$1,360.00
05/15/25	AAWT	Review documents for responsiveness and privilege for production to Committee.	0.90	\$472.50

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05/15/25	AMUE	Draft privileged document in relation to discovery requested by Committee (1.5); prepare for the deposition of Bishop Barber (1.8); analyze issues related to potential deposition of Committee members to provide advice regarding whether to take such depositions (1.4).	4.70	\$4,935.00
05/15/25	JCH	Prepare revised Exhibit B to discovery responses.	0.50	\$165.00
05/15/25	JMT	Confer with team regarding document review and production (.6); work on identifying location of communications with insurer and gather same for review (.7); review communication to parishes and priests regarding document collection (.4); and confer with T. Dolcourt regarding same (.2).	1.90	\$1,662.50
05/15/25	KAFA	Prepare files for additional cases requested by NRF (.4); update document production log (.2); locate deposition and hearing files/transcripts for Bishop Barber and Archbishop Cordilione (.8); assist with information regarding counsel for insurers (.2).	1.60	\$720.00
05/15/25	MCM	Analysis of coding and review issues in connection with review of client documents prior to production to Committee (.8); follow-up conference call with client parties regarding offsite storage and documents necessary to be pulled from same to complete discovery responses (.5); email correspondence regarding potential depositions of Committee members (.3); review talking points memorandum for use with parish employees regarding document requests and collection efforts (.4).	2.00	\$1,850.00
05/15/25	MDL	Evaluate deposition schedule with respect to third-party witnesses.	0.10	\$87.50
05/15/25	MRL	Continue drafting the deposition outlines for the Committee members (.4); email correspondence with the Foley team regarding discovery requests of communication with the insurers (.6); analyze documents regarding the insurers counsel (.6); call with M. Schachte regarding collecting Foley team members (.3); confer with H. Jagiello regarding the same (.3); analyze documents for production in response to discovery requests from the Committee (.4).	2.60	\$1,755.00

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05/15/25	MRM	Call with document review team to discuss document collection and review protocol (1.0); refine search terms for document review (1.1); coordination with document review team in connection with document review (.6); draft subpoenas for Committee members (1.8); document analysis for responsiveness and privilege for production to Committee (2.8).	7.30	\$4,927.50
05/15/25	SJM	Call with M. Mitcham regarding non-debtor subpoena issue (.2); respond to email regarding parish-level document search (.4); respond to emails regarding fact witness deposition scheduling (.3).	0.90	\$787.50
05/15/25	TND	Review memo on parish-level information to be analyzed (.8); discuss same with M. Thomas (.2); emails with Foley team related to same (.4); email to priests regarding status of individual subpoenas and follow-up matters (.7); email correspondence with proposed team for parish review (.6); strategize with A. Uetz regarding same (.2).	2.90	\$2,320.00
05/16/25	AAG	Teleconference with A. Uetz, T. Dolcourt, S. Moses, and M. Thomas to discuss collection of documents for discovery.	0.60	\$417.00
05/16/25	AAWT	Review documents for responsiveness and privilege for production to Committee.	1.70	\$892.50
05/16/25	AMUE	Work on strategy for collection of documents from priest employees including drafting privileged document regarding same (1.7); meeting with Foley team of associates regarding privileged issue concerning discovery (.6) and prepare for same (.8); provide advice regarding privileged issue concerning Committee's request for production of documents directed to the Debtor (1.3).	4.40	\$4,620.00
05/16/25	APCA	Attend Teams call to review protocol for discovery and telephone calls with individual priests.	0.60	\$381.00
05/16/25	ASBT	Review introductory materials to prepare for assignment on privileged matters related to requests for production of documents.	0.30	\$180.00

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05/16/25	ASBT	Attend conference call regarding assignment on privileged matters related to requests for production of documents.	0.60	\$360.00
05/16/25	ASK	Teleconference with team regarding discovery calls to priests.	0.70	\$455.00
05/16/25	ELJ	Conference with discovery team in preparation of document collection calls with priests (.5); review preliminary materials regarding same (.3).	0.80	\$420.00
05/16/25	JMBE	Attend call with T. Dolcourt, A. Uetz, S. Moses, M. Thomas, and associates regarding document review for bankruptcy matter.	0.60	\$360.00
05/16/25	KAFA	Analysis of additional documents for review and production.	1.10	\$495.00
05/16/25	LET	Attend on-boarding call to discuss privileged matters related to requests for production of documents.	0.60	\$390.00
05/16/25	MCM	Review email correspondence with Foley review team regarding coding and review of client documents in preparation for production of same (.4); conference call with M. Thomas regarding discovery issues (.4); review discovery responses in connection with review of documents by review team (.4).	1.20	\$1,110.00
05/16/25	MDL	Strategize with M. Moore regarding document collection and review issues.	0.30	\$262.50
05/16/25	MR	Attend strategy teleconference led by A. Uetz, T. Dolcourt and S. Moses regarding privileged matters concerning requests for production of documents.	0.60	\$477.00
05/16/25	MRL	Continue analyzing documents for production in response to discovery requests from the Committee.	3.10	\$2,092.50
05/16/25	MRM	Attention to document review coding and layout (1.0); update team concerning document review protocol (1.0); document review for production to Committee (.7).	2.70	\$1,822.50
05/16/25	NSCO	Prepare for(.3) and attend meeting to discuss procedure for conducting document discovery (.3); analyze litigation background materials and draft outline for discovery calls (.7).	1.30	\$747.50

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05/16/25	SJM	Review email from J. Lieto regarding non-debtor entity document production.	0.30	\$262.50
05/16/25	SJM	Meeting with A. Uetz and T. Dolcourt regarding script for parish-level document search (.3); further meeting with A. Uetz and T. Dolcourt regarding same (.6).	0.90	\$787.50
05/16/25	SKHE	Review documents for responsiveness and issues for production to Committee.	0.30	\$193.50
05/16/25	TND	Prepare information including script and background materials for priest discussions for team (1.6); call with A. Uetz, S. Moses, and M. Thomas regarding planning for discovery investigation (.3); call with Foley attorneys assisting on calls to priests regarding discovery (.5); calls and emails with priests on scheduling (.3).	2.70	\$2,160.00
05/17/25	MDL	Evaluate proposed deposition schedule sent by counsel for Committee.	0.10	\$87.50
05/17/25	MRL	Continue analyzing documents for production in response to discovery requests from the Committee.	0.80	\$540.00
05/17/25	SJM	Attention to issues regarding Non-Debtor Catholic Entity document production.	0.40	\$350.00
05/17/25	SKHE	Review documents for responsiveness and issues for production to Committee.	4.30	\$2,773.50
05/18/25	AMUE	Provide advice to team regarding review/collection of documents from churches.	0.70	\$735.00
05/18/25	MCM	Attention to email correspondence regarding deposition dates for various parties in connection with confirmation (.4); analyze 30(b)(6) notice to Debtor with topics (.3); review email correspondence with client parties regarding document collection (.3).	1.00	\$925.00
05/18/25	MDL	Evaluate 30(b)(6) topics proposed by Committee.	0.20	\$175.00
05/18/25	MDL	Evaluate documents to be produced by certain NDCEs.	0.10	\$87.50
05/18/25	MDL	Email exchange with C. Restel regarding upcoming depositions.	0.10	\$87.50

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05/18/25	MR	Review privileged draft document regarding outreach to churches in relation to requests for production of documents.	0.20	\$159.00
05/18/25	MRL	Continue analyzing documents for production in response to discovery requests from the Committee.	1.90	\$1,282.50
05/18/25	MRM	Document analysis for responsiveness and privilege for production to Committee.	1.30	\$877.50
05/18/25	NSCO	Analyze draft outline for discovery calls.	0.50	\$287.50
05/18/25	SJM	Attend meeting on parish document review (partial).	0.20	\$175.00
05/18/25	SKHE	Review documents for responsiveness and issues for production to Committee.	6.90	\$4,450.50
05/18/25	TND	Further preparation of information for attorneys who will be conducting priest discussions.	0.70	\$560.00
05/19/25	AAG	Initiate telephone calls and leave messages for Rev. Amaral, Rev. Avisu, Rev. Asuncion, Rev. Baraan, and Rev. Arcosa.	0.60	\$417.00
05/19/25	AAG	Update notes from Rev. Amaral interview.	0.30	\$208.50
05/19/25	AAG	Follow-up email correspondence with Rev. Amaral, Rev. Avisu, Rev. Asuncion, Rev. Baraan, and Rev. Arcosa to discuss time for document collection interview.	0.70	\$486.50
05/19/25	AAG	Teleconference with A. Uetz, T. Dolcourt, S. Moses, M. Thomas and review team to discuss interviews with parishes and collection of documents for discovery.	0.50	\$347.50
05/19/25	AAG	Conduct document collection interview with Rev. Amaral.	0.70	\$486.50
05/19/25	AAG	Email correspondence to T. Dolcourt with summary of reachout and interviews for the day.	0.20	\$139.00
05/19/25	AAG	Edit Interview templates for assigned reverends with parish and contact information.	0.50	\$347.50
05/19/25	AAWT	Review documents for responsiveness and privilege for production to Committee.	4.20	\$2,205.00

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05/19/25	AMUE	Provide advice to Foley team regarding document collection from the Debtor and its employees in response to Committee's requests.	1.40	\$1,470.00
05/19/25	APCA	Attempt telephone call to Fr. Noga, leaving voicemail and updating case file.	0.20	\$127.00
05/19/25	APCA	Attempt telephone call to Rev. Nguyen, leaving voicemail and updating case file.	0.20	\$127.00
05/19/25	APCA	Attempt telephone call to Fr. O'Rourke, leaving voicemail and updating case file.	0.20	\$127.00
05/19/25	APCA	Call with T. Dolcourt regarding discovery calls protocol.	0.10	\$63.50
05/19/25	APCA	Attempt telephone call to Fr. Nufable, leaving voicemail (.1); telephone call with Fr. Nufable regarding privileged matters related to requests for production (.5); update notes from telephone call and case file (.2).	0.80	\$508.00
05/19/25	APCA	Analyze materials provided for background on case to conduct discovery calls with individual priests.	0.90	\$571.50
05/19/25	APCA	Check-in call to review protocol and script provided for discovery calls with individual priests and discuss any questions regarding the process.	0.40	\$254.00
05/19/25	APCA	Attempt telephone call to Fr. Nieto-Ruiz, leaving voicemail (.1); telephone call with Fr. Nieto-Ruiz regarding privileged matters related to requests for production (.7); update notes from telephone call and case file (.3).	1.10	\$698.50
05/19/25	APCA	Attempt telephone call to Fr. Dung, leaving voicemail and updating case file.	0.20	\$127.00
05/19/25	ASBT	Telephone call and email to Fr. Wonganant regarding privileged matters related to requests for production of documents.	0.20	\$120.00
05/19/25	ASBT	Telephone call to Fr. Wiesner regarding privileged matters related to requests for production of documents.	0.60	\$360.00
05/19/25	ASBT	Telephone call to Fr. Young regarding privileged matters related to requests for production of documents.	0.60	\$360.00

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05/19/25	ASBT	Telephone call and email to Fr. Vazhappilly regarding privileged matters related to requests for production of documents.	0.20	\$120.00
05/19/25	ASBT	Confer regarding assignment on privileged matters related to requests for production of documents.	0.40	\$240.00
05/19/25	ASBT	Telephone call to Fr. Woldai regarding privileged matters related to requests for production of documents.	0.60	\$360.00
05/19/25	ASBT	Telephone call to Fr. Zwolenkiewicz regarding privileged matters related to requests for production of documents.	0.20	\$120.00
05/19/25	ASK	Teleconference with team regarding discovery calls to priests (.4); prepare for same (.4).	0.80	\$520.00
05/19/25	ASK	Telephone call to Fr. Mora regarding privileged matters related to requests for production of documents.	0.30	\$195.00
05/19/25	ASK	Email Fr. Mora regarding privileged matters related to requests for production of documents.	0.10	\$65.00
05/19/25	ASK	Email to Fr. Murray regarding privileged matters related to requests for production of documents.	0.10	\$65.00
05/19/25	ASK	Telephone call to Fr. McCann regarding privileged matters related to requests for production of documents.	0.30	\$195.00
05/19/25	ASK	Telephone call to Fr. Naguit regarding privileged matters related to requests for production of documents.	0.20	\$130.00
05/19/25	ASK	Telephone call to Fr. Naguit regarding privileged matters related to requests for production of documents.	0.40	\$260.00
05/19/25	ASK	Telephone call to Fr. Morales regarding privileged matters related to requests for production of documents.	0.30	\$195.00
05/19/25	ASK	Telephone call to Fr. Mundanmani regarding privileged matters related to requests for production of documents.	0.40	\$260.00

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05/19/25	ASK	Telephone call to Fr. Murray regarding privileged matters related to requests for production of documents.	0.20	\$130.00
05/19/25	ELJ	Attend follow-up introductory call in preparation for discovery collection.	0.50	\$262.50
05/19/25	ELJ	Telephone call to S. Mata regarding privileged matters related to requests for production of documents.	0.70	\$367.50
05/19/25	ELJ	Review executive summary, interview script, and declaration in preparation for discovery collection.	0.90	\$472.50
05/19/25	ELJ	Attempted telephone calls to Frs. Rudzewicz, Sales and Tamayo and S. Mata related to requests for production of documents.	0.70	\$367.50
05/19/25	ELJ	Telephone call to Fr. Ssemakula regarding privileged matters related to requests for production of documents.	0.70	\$367.50
05/19/25	ELJ	Telephone call to Fr. Schmit regarding privileged matters related to requests for production of documents.	1.00	\$525.00
05/19/25	ELMS	Prepare summary of telephone call to Fr. Pathiyil regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/19/25	ELMS	Telephone call to Fr. Pathiyil regarding privileged matters related to requests for production of documents.	0.60	\$390.00
05/19/25	ELMS	Telephone call to Fr. Pham regarding privileged matters related to requests for production of documents.	0.60	\$390.00
05/19/25	ELMS	Telephone call to Fr. Rizzo regarding privileged matters related to requests for production of documents.	0.60	\$390.00
05/19/25	ELMS	Review background materials for calls with priests regarding discovery.	1.30	\$845.00
05/19/25	ELMS	Telephone call to Fr. Rien regarding privileged matters related to requests for production of documents.	0.60	\$390.00

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05/19/25	ELMS	Telephone call to Fr. Ramirez regarding privileged matters related to requests for production of documents.	0.60	\$390.00
05/19/25	JCH	Prepare draft disclosure of expert witnesses.	0.50	\$165.00
05/19/25	JMBE	Review materials provided by T. Dolcourt (.5); meet with A. Uetz, T. Dolcourt, and other associates to discuss the document requests and outreach (.5); prepare for calls with priests by reviewing questions, formatting documents for each priest, and refining call memoranda (.6); telephone call to Fr. Lavagetto regarding privileged matters related to requests for production of documents (.4); call and email to Fr. McAleenan regarding privileged matters related to requests for production of documents (.1); call and email to Fr. Lopez regarding privileged matters related to requests for production of documents (.1); telephone call to Fr. Marrujo regarding privileged matters related to requests for production of documents (.4).	2.60	\$1,560.00
05/19/25	JMT	Review documents that were flagged for further review and quality control (1.2); confer with document review team regarding document review (.4); confer with team regarding status of document review (.4); confer with client regarding supplemental document collection (.3).	2.30	\$2,012.50
05/19/25	LET	Telephone conversation with Fr. Clemens to discuss privileged matters related to requests for production of documents.	0.80	\$520.00
05/19/25	LET	Attempt to contact via phone and email assigned parishes to discuss privileged matters related to request for production of documents.	0.90	\$585.00
05/19/25	MADR	Prepare for telephone calls to pastors regarding subpoena requests.	0.20	\$120.00
05/19/25	MADR	Attempt call to Rev. Farrell regarding requests for production of documents.	0.10	\$60.00
05/19/25	MADR	Attempt call to Rev. Flores regarding request for production of documents.	0.10	\$60.00
05/19/25	MADR	Attempt call to Rev. Franca regarding requests for production of documents.	0.10	\$60.00

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05/19/25	MADR	Correspond with T. Dolcourt regarding communications to priests and document review for production.	0.20	\$120.00
05/19/25	MADR	Correspond with M. Thomas regarding document review.	0.10	\$60.00
05/19/25	MADR	Attempt call to N. Glisson regarding requests for production of documents.	0.10	\$60.00
05/19/25	MADR	Attempt call to Rev. Gomez regarding request for production of documents.	0.10	\$60.00
05/19/25	MCM	Attention to issues concerning off-site storage of RCBO documents, including telephone conference with counsel for Committee explaining situation and path forward with potential production (1.0); confer with M. Thomas regarding document review prior to productions (.4).	1.40	\$1,295.00
05/19/25	MDL	Evaluate status of document collection, review, and production.	0.30	\$262.50
05/19/25	MDL	Strategize regarding deposition schedule.	0.20	\$175.00
05/19/25	MDL	Revise 30(b)(6) notice of deposition for Committee.	0.20	\$175.00
05/19/25	MR	Attend strategy teleconference led by A. Uetz and T. Dolcourt regarding privileged matters concerning requests for production of documents.	0.40	\$318.00
05/19/25	MR	Telephone call to Fr. Hoang regarding privileged matters related to requests for production of documents.	0.60	\$477.00
05/19/25	MR	Telephone call to Fr. Edgerly regarding privileged matters related to requests for production of documents.	0.10	\$79.50
05/19/25	MR	Telephone call to Fr. Gutierrez regarding privileged matters related to requests for production of documents.	0.10	\$79.50
05/19/25	MR	Telephone call to Fr. D'Anjou regarding privileged matters related to requests for production of documents.	0.10	\$79.50

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05/19/25	MRL	Confer with M. Thomas regarding discovery requests concerning communication with the insurers (.2); email correspondence with the Foley team regarding same (.2); continue drafting the deposition outlines for the Committee members (.5); continue analyzing documents for production in response to discovery requests from the Committee (5.1).	6.00	\$4,050.00
05/19/25	MRM	Document analysis for responsiveness and privilege for production to Committee (3.3); coordination with document review team in connection with the same (2.0).	5.30	\$3,577.50
05/19/25	NSCO	Prepare for (.1) and attend meeting to discuss procedure for conducting document discovery (.4).	0.50	\$287.50
05/19/25	NSCO	Review outline detailing procedure for calls regarding privileged matters related to requests for production of documents.	0.60	\$345.00
05/19/25	NSCO	Correspond via email regarding privileged matters related to requests for production of documents.	0.30	\$172.50
05/19/25	NSCO	Telephone conversations and voicemail messages to priests regarding privileged matters related to request for production of documents.	0.80	\$460.00
05/19/25	SJM	Multiple revisions to expert witness disclosure (1.6); email correspondence with C. Moore and A. Uetz regarding same (.5).	2.10	\$1,837.50
05/19/25	SJM	Attention to issues related to depositions of debtor witnesses.	1.30	\$1,137.50
05/19/25	SJM	Attention to issues regarding Committee subpoenas to Non-Debtor Catholic Entities related to plan.	0.70	\$612.50
05/19/25	SJM	Confer with T. Dolcourt regarding parish documents review (.3); analyze issues regarding same (.6); email correspondence with M. Roberts and A. Batista regarding specific potential issues related to same (.4).	1.30	\$1,137.50
05/19/25	SJM	Email correspondence with case team regarding off-site storage documents.	0.30	\$262.50
05/19/25	SKHE	Review documents for responsiveness and issues for production to Committee.	6.50	\$4,192.50

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05/19/25	TND	Multiple email communications and calls with associates reaching out to priests regarding documents (3.4); call with team on same (.5); follow up on information for document requests (.4).	4.30	\$3,440.00
05/20/25	AAG	Follow-up calls and email correspondence with M. Acosta and Rev. Arcosa to schedule interview.	0.40	\$278.00
05/20/25	AAG	Follow-up calls and email correspondence with Rev. Abraham to schedule interview.	0.40	\$278.00
05/20/25	AAG	Follow up calls and email correspondence with Rev. Avisu to schedule interview.	0.40	\$278.00
05/20/25	AAG	Conduct interview with Rev. Avisu to discuss parish's files and documents.	1.00	\$695.00
05/20/25	AAG	Update notes from interviews with Rev. Abraham and W. Bankson from St. Joan of Arc Parish.	0.30	\$208.50
05/20/25	AAG	Conduct interview with W. Bankson (business manager) to discuss St. Joan of Arc Parish's files and documents.	0.40	\$278.00
05/20/25	AAG	Conduct interview with Rev. Baraan to discuss parish's files and documents.	0.50	\$347.50
05/20/25	AAG	Update notes from interview with Rev. Avisu.	0.30	\$208.50
05/20/25	AAG	Email correspondence with T. Dolcourt regarding interview memos for the day and status of interviews.	0.30	\$208.50
05/20/25	AAG	Conduct interview with A. Mendita (Business Manager) to discuss St. Joseph Parish's files and documents.	0.70	\$486.50
05/20/25	AAG	Follow-up calls and email correspondence with Rev. Baraan to schedule interview.	0.40	\$278.00
05/20/25	AAG	Conduct interview with Rev. Abraham to discuss parish's files and documents.	0.40	\$278.00
05/20/25	AAG	Update notes from interviews with Rev. Baraan and A. Mendita from St. Joseph Parish.	0.30	\$208.50
05/20/25	AAWT	Review documents for responsiveness and privilege for production to Committee.	3.80	\$1,995.00

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05/20/25	AMUE	Prepare for deposition of D. Flanagan and A. Bardos (2.2); meeting with A. Bardos, D. Flanagan and M. Lee regarding discovery (4.5); review documents provided to me by R. Medeiros regarding privileged matter (1.6); review documents identified by Foley team for possible production regarding privileged matter (1.2); identify 30(b)(6) witnesses for deposition (.5); organize documents for review with client leadership regarding privileged matter (.8).	10.80	\$11,340.00
05/20/25	APCA	Draft update to supervising attorneys and update list tracker with notes from telephone calls with various priests.	0.20	\$127.00
05/20/25	APCA	Telephone call with Fr. Noga regarding privileged matters related to requests for production (.4); update notes from telephone call and case file (.3).	0.70	\$444.50
05/20/25	APCA	Telephone call with Fr. Dung regarding privileged matters related to requests for production (.5); update notes from telephone call and case file (.3).	0.80	\$508.00
05/20/25	APCA	Telephone call with Fr. Nguyen regarding privileged matters related to requests for production (.4); update notes from telephone call and case file (.3).	0.70	\$444.50
05/20/25	APCA	Attempt to call Fr. O'Rourke, leaving voicemail and sending follow-up email.	0.10	\$63.50
05/20/25	ASBT	Telephone call to Fr. Wonganant regarding privileged matters related to requests for production of documents.	0.30	\$180.00
05/20/25	ASBT	Telephone call to Fr. Zwolenkiewicz and parish regarding privileged matters related to requests for production of documents.	1.00	\$600.00
05/20/25	ASBT	Telephone call to Fr. Vazhappilly regarding privileged matters related to requests for production of documents.	0.30	\$180.00
05/20/25	ASK	Telephone call to Fr. McCann regarding privileged matters related to requests for production of documents.	0.60	\$390.00
05/20/25	ASK	Review electronic documents for responsiveness and relevance for production to Committee.	6.90	\$4,485.00

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05/20/25	ASK	Telephone call to Fr. Mara regarding privileged matters related to requests for production of documents.	0.30	\$195.00
05/20/25	ELJ	Review case background materials (including the Committee's discovery requests) in preparation for completing document review for relevance and privilege.	0.70	\$367.50
05/20/25	ELJ	Telephone call to S. Mata regarding privileged matters related to requests for production of documents.	0.20	\$105.00
05/20/25	ELJ	Telephone call to Fr. Rudzewicz regarding privileged matters related to requests for production of documents.	0.40	\$210.00
05/20/25	ELJ	Attend meeting regarding document review protocol.	0.30	\$157.50
05/20/25	ELJ	Begin reviewing documents for relevance and privilege for production to Committee.	2.80	\$1,470.00
05/20/25	ELJ	Telephone call to Fr. Sales regarding privileged matters related to requests for production of documents.	0.20	\$105.00
05/20/25	ELMS	Prepare memo of telephone call to Fr. Rien regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/20/25	ELMS	Prepare memo of telephone call to Fr. Pham regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/20/25	ELMS	Prepare memo of telephone call to Fr. Pathiyil regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/20/25	ELMS	Prepare memo of telephone call to Fr. Rizzo regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/20/25	ELMS	Prepare memo of telephone call to Fr. Ramirez regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/20/25	HLAN	Review documents for responsiveness in preparation for production.	4.60	\$3,266.00

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05/20/25	JMBE	Meet with M. Mitcham, M. Driscoll, E. Juneau, and A. Kmeid to discuss document review (.3); prepare for calls and finalize call memoranda (.2); call and email to Fr. Macalinao regarding privileged matters related to requests for production of documents (.6); call and email to Fr. Lopez regarding privileged matters related to requests for production of documents (.1); correspond with A. Perez-Guimamaraes, the business administrator of Holy Spirit- Newman Hall, and A. Baker and R. Harmon, the bookkeeper and office manager of St. Anne (.1); call Fr. Lopez regarding privileged matters related to requests for production of documents (.1); call Fr. McAleenan regarding privileged matters relating to requests for production of documents (.1); call to A. Baker from St. Anne Parish regarding privileged matters related to requests for production of documents (.4); conduct document review (.7).	2.60	\$1,560.00
05/20/25	JMT	Confer with document review team regarding status of document review and issues with same (.6); quality control document review and assist in addressing issues with review (4.3); confer with team regarding off-site storage (.4); identify additional search terms and work with team to apply same (.6).	5.90	\$5,162.50
05/20/25	KAFA	Prepare documents for production to the Committee.	0.30	\$135.00
05/20/25	LET	Email D. Smith to set up telephone call regarding privileged matters related to requests for production of documents.	0.20	\$130.00
05/20/25	LET	Attempt to contact Rev. Coleman regarding privileged matters related to requests for production of documents.	0.30	\$195.00
05/20/25	LET	Email Rev. Arturo to set up telephone call regarding privileged matters related to requests for production of documents.	0.10	\$65.00
05/20/25	LET	Email Rev. Carillo to set up telephone call regarding privileged matters related to requests for production of documents.	0.10	\$65.00

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05/20/25	LET	Telephone call to Fr. Coleman regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/20/25	LET	Call with Rev. Barber regarding privileged matter related to document production.	0.30	\$195.00
05/20/25	MADR	Meet with M. Mitcham to discuss document review and production.	0.40	\$240.00
05/20/25	MADR	Correspond with colleagues regarding priest communications on document production matters.	0.20	\$120.00
05/20/25	MADR	Draft and send email to St. Bede Parish regarding document collection (.1); call with Rev. Farrell (.1); call St. Bede Parish regarding document collection needs (.1); discussion with Rev. Ferrell (.1).	0.40	\$240.00
05/20/25	MADR	Correspond with H. Franca regarding privileged information on document production matters.	0.20	\$120.00
05/20/25	MADR	Prepare summary of call with Rev. Franca.	0.20	\$120.00
05/20/25	MADR	Call with L. Montoya, St. Bede business manager, regarding privileged matters related to requests for production of documents.	0.60	\$360.00
05/20/25	MADR	Prepare summary of call with Rev. Gomez.	0.20	\$120.00
05/20/25	MADR	Call with Fr. Glisson to discuss privileged matters related to requests for production of documents.	0.30	\$180.00
05/20/25	MADR	Correspond with T. Dolcourt regarding status of contact with priests for requests for production of documents.	0.10	\$60.00
05/20/25	MADR	Prepare summary of call with N. Glisson.	0.20	\$120.00
05/20/25	MADR	Prepare summary of call with L. Montoya.	0.20	\$120.00
05/20/25	MADR	Attempt call to Rev. Ramiro regarding privileged information on requests for production of documents.	0.10	\$60.00
05/20/25	MADR	Attempt call with Fr. Farrell regarding requests for production of documents.	0.10	\$60.00
05/20/25	MADR	Attempt call to Fr. Glisson regarding privileged matters related to requests for production of documents.	0.10	\$60.00

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05/20/25	MADR	Review documents for responsiveness in reference to Committee's subpoena.	0.10	\$60.00
05/20/25	MCM	Analyze email correspondence regarding document collection and discovery issues (.5); quality-control review of documents for privilege and responsiveness (1.5); email and telephone communications with client parties regarding collection of financial information (.5); analyze documents in connection with preparation of Bishop Barber for deposition (1.0); conference call with M. Thomas regarding additional document searches and collections (.5); analyze issues in connection with same (.7).	4.70	\$4,347.50
05/20/25	MDL	Strategize with Foley team regarding document discovery and deposition preparation.	1.80	\$1,575.00
05/20/25	MR	Telephone call to Fr. Edgerly regarding privileged matters related to requests for production of documents.	0.10	\$79.50
05/20/25	MR	Telephone call to Fr. Gutierrez regarding privileged matters related to requests for production of documents.	0.70	\$556.50
05/20/25	MR	Telephone call to Fr. D'Anjou regarding privileged matters related to requests for production of documents.	0.10	\$79.50
05/20/25	MRL	Continue drafting the deposition outlines for the Committee members (.8); continue analyzing documents for production in response to discovery requests from the Committee (4.6); confer with J. Thomas regarding reviewing documents with insurers' counsel (.2); analyze documents regarding communication with insurers' counsel (.2).	5.80	\$3,915.00
05/20/25	MRM	Conduct call with new members of document review team (.7); follow-up coordination with team in connection with review (1.8); analyze documents for responsiveness and privilege for production to Committee(3.9).	6.40	\$4,320.00
05/20/25	NSCO	Draft notes summarizing telephone calls regarding privileged matters related to requests for production of documents.	0.90	\$517.50

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05/20/25	NSCO	Telephone call to Fr. Lijoy regarding privileged matters relating to requests for production of documents.	0.50	\$287.50
05/20/25	NSCO	Telephone conversations and voicemail messages regarding privileged matters related to requests for production of documents.	0.30	\$172.50
05/20/25	NSCO	Telephone call to Fr. Khue regarding privileged matters relating to requests for production of documents.	0.40	\$230.00
05/20/25	NSCO	Correspond with T. Dolcourt regarding progress on discovery calls.	0.40	\$230.00
05/20/25	NSCO	Telephone call to Fr. Avalos regarding privileged matters relating to requests for production of documents.	0.10	\$57.50
05/20/25	SJM	Attention to logistics for depositions in San Francisco office.	0.60	\$525.00
05/20/25	SKHE	Review documents for responsiveness and issues for production to Committee.	3.90	\$2,515.50
05/20/25	TND	Respond to multiple (10+) inquiries from associates as they have discussions with priests on document issues (1.6); call with Fr. Landeza regarding documents at St. Benedict and Divine Mercy (.3); prepare reports for same (.4); update detailed tracking sheet of priest contacts and next steps based on reporting from associates (1.1).	3.40	\$2,720.00
05/21/25	AAG	Follow-up telephone calls and leave messages for Rev. Asuncion and Rev. Arcosa.	0.40	\$278.00
05/21/25	AAG	Interview with C. Littleton (on behalf of Rev. Asuncion) to discuss parish's documents and files for potential collection.	0.50	\$347.50
05/21/25	AAG	Update notes from M. Acosta interview.	0.30	\$208.50
05/21/25	AAG	Email correspondence with T. Dolcourt and case team regarding additional questions for document collection interviews.	0.20	\$139.00
05/21/25	AAG	Correspondence with J. Beveridge, M. Driscoll and L. Telleen regarding best practices for conducting parish interviews.	0.30	\$208.50

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05/21/25	AAG	Interview with M. Acosta (on behalf of Rev. Arcosa) to discuss parish's documents and files for potential collection.	0.70	\$486.50
05/21/25	AAG	Update notes from C. Littleton interview.	0.30	\$208.50
05/21/25	AAWT	Review documents for responsiveness and privilege for production to Committee.	2.50	\$1,312.50
05/21/25	AMUE	Meeting with M. Moore and M. Thomas regarding privileged matter concerning document discovery (1.0); debrief meeting with T. Carlucci regarding same (.3); debrief meeting with M. Lee regarding same (.5).	1.80	\$1,890.00
05/21/25	AMUE	Finalize response and objection to 30(b)(6) deposition notice (.8) and communications with M. Kaplan regarding same (.4).	1.20	\$1,260.00
05/21/25	ASBT	Telephone call to Fr. Wiesner regarding privileged matters related to requests for production of documents.	0.30	\$180.00
05/21/25	ASBT	Telephone call to Fr. Zwolenkiewicz regarding privileged matters related to requests for production of documents.	0.30	\$180.00
05/21/25	ASBT	Telephone call to Fr. Young regarding privileged matters related to requests for production of documents.	0.20	\$120.00
05/21/25	ASBT	Telephone call to Fr. Wonganant regarding privileged matters related to requests for production of documents.	0.10	\$60.00
05/21/25	ASBT	Telephone call to Fr. Vazhappilly regarding privileged matters related to requests for production of documents.	0.10	\$60.00
05/21/25	ASBT	Telephone call to Fr. Woldai regarding privileged matters related to requests for production of documents.	0.20	\$120.00
05/21/25	ASK	Analyze electronic documents for responsiveness and relevance for production to Committee.	3.00	\$1,950.00
05/21/25	ASK	Telephone call to Fr. Murray regarding privileged matters related to requests for production of documents.	0.30	\$195.00

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05/21/25	ELJ	Review documents for relevance and privilege for production to Committee.	1.30	\$682.50
05/21/25	ELJ	Correspond with Fr. Sales regarding scheduling document collection call.	0.40	\$210.00
05/21/25	ELJ	Review priest interview notes to determine whether follow-up document collections are needed.	0.50	\$262.50
05/21/25	JMBE	Conduct document review (4.1); correspond with T. Dolcourt regarding discovery requests (.2); correspond with Reverends Lopez and McAleenan regarding privileged matters (.1); prepare memoranda following calls (.3); call to R. Gallo-Casillas regarding privileged matters related to requests for production of documents (.6); call to R. Clark regarding privileged matters related to requests for production of documents (.2); call to A. Perez-Guimaraes regarding privileged matters related to requests for production of documents (.2); call to M. Ledezma regarding privileged matters related to requests for production of documents (.1); correspond with R. Clark regarding privilege matters (.1).	5.90	\$3,540.00
05/21/25	JMT	Quality-control document review (4.7); confer with team regarding results of document review and status of same (1.4); confer with team regarding results of document review and status of remaining documents to be reviewed (1.1).	7.20	\$6,300.00
05/21/25	LET	Telephone conversation with Rev. Avalos' bookkeeper regarding privileged matters related to requests for production of documents.	0.60	\$390.00
05/21/25	LET	Prepare summary of telephone conversation with Fr. Clemens regarding privileged matters related to requests for production of documents.	0.80	\$520.00
05/21/25	LET	Prepare summary of telephone conversation with Fr. Quang and bookkeeper regarding privileged matters related to requests for production of documents.	0.60	\$390.00
05/21/25	LET	Prepare summary of telephone conversation with Rev. Avalos' bookkeeper regarding privileged matters related to requests for production of documents.	0.60	\$390.00

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05/21/25	LET	Initial telephone conversation with Fr. Barber regarding privileged matters related to requests for production of documents.	0.20	\$130.00
05/21/25	LET	Prepare summary of telephone conversation with Fr. Coleman regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/21/25	LET	Attempt to contact Fr. Barber and others at his parish to discuss privileged matters related to requests for production of documents.	0.40	\$260.00
05/21/25	LET	Telephone conversation with Rev. Carillo's bookkeeper regarding privileged matters related to requests for production of documents.	0.40	\$260.00
05/21/25	LET	Prepare summary of telephone conversation with Rev. Carillo's bookkeeper regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/21/25	MADR	Correspond with Rev. Glisson regarding privileged information as to request for collection of documents.	0.30	\$180.00
05/21/25	MADR	Correspond with St. Bede Parish on privileged matters related to request for production of documents.	0.10	\$60.00
05/21/25	MADR	Review documents for responsiveness to Committee's subpoena.	2.70	\$1,620.00
05/21/25	MADR	Call with Sacred Heart Parish on privileged information regarding request for collection of documents.	0.10	\$60.00
05/21/25	MADR	Attempt call to Rev. Flores regarding request for production of documents (.1); email follow-up (.1).	0.20	\$120.00
05/21/25	MADR	Correspond with T. Dolcourt regarding privileged information from priest calls regarding document requests.	0.20	\$120.00
05/21/25	MADR	Prepare summary of call with Fr. Flores.	0.30	\$180.00

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05/21/25	MCM	Continue working on additional document searches, collections, and review based on documents previously identified (2.0); analysis of documents identified by review teams (1.2); email correspondence regarding same (.5); analysis of settlement agreement productions and related issues (.6).	4.30	\$3,977.50
05/21/25	MR	Strategy teleconference with A. Uetz, T. Dolcourt and S. Moses regarding confidential matters related to requests for production (partial).	0.50	\$397.50
05/21/25	MRL	Confer with M. Mitcham and M. Moore regarding status of the document review process (.3); continue analyzing documents for production in response to discovery requests from the Committee (1.6); continue analyzing documents regarding communication with insurers' counsel (4.6).	6.50	\$4,387.50
05/21/25	MRM	Meetings and coordination in connection with document review and next steps (.7); quality-control review of documents marked as responsive and non-privileged (4.1); analysis of documents with insurers for responsiveness and privilege for production to Committee (1.8) for production to Committee.	6.60	\$4,455.00
05/21/25	NSCO	Telephone calls and emails regarding privileged matters relating to requests for production of documents.	0.40	\$230.00
05/21/25	SJM	Attend (for part) meeting with T. Dolcourt and A. Uetz regarding parish document collection status.	0.20	\$175.00
05/21/25	SJM	Call with P. Bongiovanni regarding production upload of financial documents for production.	0.30	\$262.50
05/21/25	SJM	Emails with case team regarding Committee meet and confer as to Debtor interrogatory responses.	0.40	\$350.00
05/21/25	SJM	Review status of court reporter reservations for depositions (.3); email to counsel for insurers regarding notices of deposition (.3).	0.60	\$525.00

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05/21/25	TND	Review updates from associates who have completed priest calls to determine remaining parties to speak with and document status (1.2); communications with associate team on further follow-up (1.1); call with A. Uetz, M. Roberts, and S. Moses (partial) on discovery matters (.8); prepare response to 30(b)(6) notice (1.7).	4.80	\$3,840.00
05/22/25	AAG	Email correspondence with T. Dolcourt regarding final interview memos and status of document collection interviews.	0.60	\$417.00
05/22/25	AMUE	Provide advice regarding privileged issue concerning discovery matter including review of client emails concerning same.	2.60	\$2,730.00
05/22/25	ASBT	Telephone call to Fr. Young regarding privileged matters related to requests for production of documents.	0.10	\$60.00
05/22/25	ASK	Telephone call to Armanino regarding matters related to requests for production of documents.	0.40	\$260.00
05/22/25	ASK	Analyze electronic documents for responsiveness and relevance for production to Committee.	7.00	\$4,550.00
05/22/25	ASK	Telephone call to Fr. Mundanmani regarding privileged matters related to requests for production of documents.	0.10	\$65.00
05/22/25	ASK	Telephone call to Fr. Mora regarding privileged matters related to requests for production of documents.	0.10	\$65.00
05/22/25	ELJ	Review documents for relevance and privilege for production to Committee.	2.70	\$1,417.50
05/22/25	ELJ	Telephone call with M. Zamora, business director.	0.30	\$157.50
05/22/25	ELJ	Telephone call with Fr. Sales.	0.60	\$315.00
05/22/25	ELMS	Revise Priest Call Summary - St. Jerome Parish, Rev. Pham.	0.30	\$195.00
05/22/25	ELMS	Revise Priest Call Summary - St. John Vianney Parish, I. Pethebridge.	0.70	\$455.00

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05/22/25	JMBE	Conduct document review (1.0); call to A. Perez-Guimaraes regarding privileged matters related to requests for production of documents (.6); prepare call memorandum and updates for T. Dolcourt (.4); call to H. Dunn regarding privileged matters related to requests for production of documents (.3).	2.30	\$1,380.00
05/22/25	JMT	Manage document review and address issues related to same (3.3); quality-control document review and prepare documents for production (2.8); confer with team regarding results of document review and issues that are raised (1.1).	7.20	\$6,300.00
05/22/25	KAFA	Revise supplemental Exhibit B to interrogatory responses.	0.30	\$135.00
05/22/25	LET	Prepare summary of telephone conversation with Rev. Baker and bookkeeper regarding privileged matters related to requests for production of documents.	0.70	\$455.00
05/22/25	LET	Telephone conversation with Rev. Avalos' bookkeeper regarding privileged matters related to requests for production of documents..	0.90	\$585.00
05/22/25	MADR	Review documents for responsiveness to subpoena.	0.40	\$240.00
05/22/25	MADR	Call with Sacred Heart bookkeeper to discuss privileged information regarding requests for production of documents.	0.30	\$180.00
05/22/25	MADR	Prepare summary of call with Sacred Heart Parish.	0.20	\$120.00
05/22/25	MCM	Analyze email correspondence by and between client parties, professionals, and third parties prior to production of same in response to Committee requests (8.0); draft email memorandum to Foley team regarding same and next steps in connection with production (1.3).	9.30	\$8,602.50
05/22/25	MDL	Evaluate document collection and review issues and potential assertion of privilege as to certain documents.	0.50	\$437.50
05/22/25	MDL	Revise Exhibit B to supplemental interrogatory responses following 5/21 meeting with client.	0.40	\$350.00

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05/22/25	MRL	Confer with J. Thomas regarding status of the document review process (.2); continue analyzing documents regarding communication with insurers' counsel (9.7).	9.90	\$6,682.50
05/22/25	MRM	Analysis of insurance documents.	6.80	\$4,590.00
05/22/25	NSCO	Telephone call to Fr. Avalos regarding privileged matters relating to requests for production of documents.	0.60	\$345.00
05/22/25	NSCO	Draft notes summarizing telephone call with Fr. Avalos regarding privileged matters related to requests for production of documents.	0.50	\$287.50
05/22/25	NSCO	Provide T. Dolcourt with update regarding discovery progress.	0.50	\$287.50
05/22/25	SJM	Email correspondence with T. Dolcourt, A. Uetz and client regarding parish document interview progress (.7); review reports from interviews (.8).	1.50	\$1,312.50
05/22/25	SKHE	Review documents for responsiveness and issues for production to Committee.	3.40	\$2,193.00
05/22/25	TND	Further review of results of priest interviews to gather information on documents (2.2); email and telephone communications with Foley team members gathering information to provide information and guidance (1.1); emails with Foley discovery team on information for production (.3).	3.60	\$2,880.00
05/23/25	AAG	Review interview memos and draft summary and update chart of documents to collect from assigned parishes for T. Dolcourt.	1.20	\$834.00
05/23/25	AAWT	Review documents for responsiveness and privilege for production to Committee.	3.30	\$1,732.50
05/23/25	AMUE	Meet and confer with M. Kaplan regarding 30(b)(6) witness.	0.40	\$420.00
05/23/25	AMUE	Meeting with M. Lee and M. Moore (1.6) to strategize regarding discovery matter; follow up with Foley team regarding open discovery matters to provide advice/direction regarding same (.8).	2.40	\$2,520.00
05/23/25	ASK	Analyze electronic documents for responsiveness and relevance for production to Committee.	6.40	\$4,160.00

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05/23/25	ELJ	Continue reviewing documents for relevance and privilege.	3.70	\$1,942.50
05/23/25	JMBE	Conduct document review for responsiveness.	2.10	\$1,260.00
05/23/25	JMT	Confer with S. Moses concerning document review and quality control of same (.8); confer with M. Rofeil regarding status of document review and production (1.3); quality control document review and assist with finalizing production (4.2).	6.30	\$5,512.50
05/23/25	KAFA	Communications with team regarding upcoming document productions.	0.40	\$180.00
05/23/25	MADR	Review documents for responsiveness to requests for documents.	3.70	\$2,220.00
05/23/25	MCM	Strategize with Foley team regarding discovery matters following review of emails and in context of productions (1.5); email correspondence with review teams regarding same in preparation for first production of client and related correspondence (.3); conference call with M. Thomas regarding productions (.5); analyze additional documents identified by review team (1.0); analyze RCWC amended responses to subpoenas and production of documents (.7); work with litigation support team to run additional searches and coordinate review of same (.6).	4.60	\$4,255.00
05/23/25	MDL	Email correspondence with P. Glaessner (Allen Glaessner Hazelwood Werth) regarding document production questions related to claims against the estate.	0.20	\$175.00
05/23/25	MDL	Email exchange with M. Kaplan (Lowenstein) regarding corporate representative deposition notice for Committee.	0.20	\$175.00
05/23/25	MDL	Strategize with Foley team regarding document production, completeness of collection, and third-party subpoena issues in multiple meetings and correspondence.	2.90	\$2,537.50

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05/23/25	MRL	Confer with M. Thomas regarding status of the document review process (.3); confer with M. Schachte regarding production of the documents (.4); continue analyzing documents for production in response to discovery requests from the Committee (1.3); continue analyzing documents regarding communication with insurers' counsel (7.3).	9.30	\$6,277.50
05/23/25	MRM	Analyze documents for responsiveness and privilege for production to Committee.	2.00	\$1,350.00
05/23/25	NSCO	Analyze documents responsive to discovery requests.	3.40	\$1,955.00
05/23/25	SJM	Follow up regarding logistics for depositions (.2); strategize with A. Uetz, M. Lee, and M. Moore regarding discovery and related issues and strategy (1.9); multiple calls with M. Thomas regarding document production status and approach (.6); call with M. Schachte regarding document production (.3); email correspondence with case team regarding document production (.8).	3.80	\$3,325.00
05/23/25	SJM	Draft email to Committee counsel regarding discovery matters.	0.40	\$350.00
05/23/25	SJM	Manage document review for email production.	1.60	\$1,400.00
05/23/25	SKHE	Review documents based on responsiveness and issues for production to Committee.	1.30	\$838.50
05/23/25	SMP	Review documents for production.	3.80	\$2,945.00
05/23/25	TND	Further review of information gathered from interviews with priests (1.7); communications with Foley team conducting interviews on same (.3); discussions with Foley discovery team regarding interviews (.3).	2.30	\$1,840.00
05/24/25	APCA	Update notes on tracker with documents that need to be collected and the remaining priest that still has not responded.	0.20	\$127.00
05/24/25	JMT	Quality control VeraCruz production and prepare same for service to the other side.	8.40	\$7,350.00

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05/24/25	MCM	Analyze documents prior to production of VeraCruz materials from client records (2.5); telephone conference with M. Thomas regarding same (.5); continue working on additional searches and review queues with litigation support team (1.0); quality control review of next-slated production (1.0).	5.00	\$4,625.00
05/24/25	MRL	Continue analyzing documents for production in response to discovery requests from the Committee (1.6); analyze documents for second review to produce documents to the Committee (2.6); email correspondence with the Foley team regarding the document production (.9).	5.10	\$3,442.50
05/24/25	NSCO	Analyze documents responsive to discovery requests.	1.50	\$862.50
05/24/25	SKHE	Review documents based on responsiveness and issues for production to Committee.	0.20	\$129.00
05/25/25	JMT	Assist with family document and document review.	9.70	\$8,487.50
05/25/25	MCM	Analyze additional documents and family identified in searches by litigation support and review teams (3.7); telephone conference with M. Thomas and M. Lee regarding same and next production (.3).	4.00	\$3,700.00
05/25/25	MDL	Strategize with M. Thomas and M. Moore regarding document review and production issues.	0.30	\$262.50
05/25/25	MRL	Continue analyzing documents for production in response to discovery requests from the Committee.	1.50	\$1,012.50
05/25/25	SJM	Attention to planning for upcoming depositions.	0.40	\$350.00
05/25/25	SJM	Assist with document production issues (1.8); analyze appropriate approach to responses to Committee comments on Debtor interrogatory responses (.8).	2.60	\$2,275.00
05/26/25	AAWT	Review documents for responsiveness and privilege for production to Committee.	0.90	\$472.50
05/26/25	ASK	Analyze electronic documents for responsiveness and relevance for production to Committee.	2.00	\$1,300.00

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05/26/25	ELJ	Continue reviewing documents for relevance and privilege.	1.80	\$945.00
05/26/25	JMBE	Conduct document review to determine responsiveness to document requests.	1.20	\$720.00
05/26/25	JMT	Assist document review team regarding issues with document review (1.3); assist document review team with document review and family review (6.6).	7.90	\$6,912.50
05/26/25	MADR	Analyze and code documents for responsiveness to requests for documents.	2.90	\$1,740.00
05/26/25	MCM	Analyze discovery strategy in context of confirmation hearing and existing scheduling order.	0.50	\$462.50
05/26/25	MCM	Quality control review of documents and email correspondence prior to production of same (2.0); email and telephone communications with Foley team regarding ongoing review and timeline (.5); prepare for depositions scheduled for the week of May 26 in RCBO bankruptcy (.6); analyze documents identified by review team (.7).	3.80	\$3,515.00
05/26/25	MR	Analyze documents for responsiveness to requests from Committee.	4.20	\$3,339.00
05/26/25	MRL	Continue analyzing documents for production in response to discovery requests from the Committee.	4.40	\$2,970.00
05/26/25	NSCO	Analyze documents responsive to discovery requests.	4.10	\$2,357.50
05/26/25	SJM	Assist with review of Debtor emails for production.	3.50	\$3,062.50
05/26/25	SKHE	Review documents for responsiveness and issues for production to Committee.	3.60	\$2,322.00
05/27/25	AAG	Conduct document review in Relativity for RFP's.	0.80	\$556.00
05/27/25	AAWT	Review documents for responsiveness and privilege for production to Committee.	1.90	\$997.50

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05/27/25	AMUE	Meeting with A. Bardos and D. Flanagan to prepare for deposition (3.0); review documents in preparation for depositions (2.5); meeting with Foley team regarding privileged issue concerning document production (1.0).	6.50	\$6,825.00
05/27/25	ASK	Analyze electronic documents for responsiveness and relevance for production to Committee.	3.10	\$2,015.00
05/27/25	ELJ	Review follow-up documents from Fr. Sales.	0.20	\$105.00
05/27/25	JMBE	Continue conducting document review to determine responsiveness to Committee's requests.	0.40	\$240.00
05/27/25	JMT	Identify documents that need to be clawed back (1.7); continue to quality check document production (2.3); assist review team with document review and addressing review questions (4.6).	8.60	\$7,525.00
05/27/25	KAFA	Analysis of emails regarding document productions to Committee (.4); update document production log (.2); prepare client documents for production to Committee (.3); call with E. Mazzocco regarding documents produced to OMM (.5); communications with team regarding discovery (.2).	1.60	\$720.00
05/27/25	MADR	Code documents for privilege and responsiveness to requests for documents.	2.20	\$1,320.00
05/27/25	MCM	Prepare for deposition of Bishop Barber scheduled for June 3, 2025 through review of documents and other materials (2.3); follow-up email correspondence regarding status of document productions and review based on progress to date (.7); work on issues in connection with production of settlement agreements (.4); continue working on quality-control review of documents to be produced to Committee (2.5); confer with Foley team regarding results of document review and next steps (.5).	6.40	\$5,920.00
05/27/25	MDL	Evaluate status of production of documents related to certain pre-petition tort claims.	0.30	\$262.50
05/27/25	MDL	Strategize with A. Uetz and M. Thomas regarding recent and future document productions and review.	1.00	\$875.00

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05/27/25	MR	Analyze documents for responsiveness to requests from Committee.	0.90	\$715.50
05/27/25	MRL	Confer with M. Mitcham, M. Moore, and M. Thomas regarding status of the document review process (.6); confer with A. Gifford regarding analyzing documents to make a production (.3); continue analyzing documents for production in response to discovery requests from the Committee (6.7).	7.60	\$5,130.00
05/27/25	MRM	Analyze documents for responsiveness and privilege for production to Committee.	7.30	\$4,927.50
05/27/25	NSCO	Analyze documents responsive to discovery requests.	1.50	\$862.50
05/27/25	SJM	Emails with insurer counsel regarding 5/28 depositions.	0.40	\$350.00
05/27/25	SJM	Work on materials for D. Flanagan deposition (1.4); call with D. Flanagan regarding same (.4); email to A. Uetz regarding same (.4).	2.20	\$1,925.00
05/27/25	SJM	Review issues regarding privilege in connection with document productions (1.1); email to case team regarding same (.2).	1.30	\$1,137.50
05/27/25	SJM	Attention to emails regarding preparations for 5/28 and 5/30 depositions.	0.60	\$525.00
05/27/25	SKHE	Review documents for responsiveness and issues for production to Committee.	5.90	\$3,805.50
05/28/25	AAG	Conduct document review in Relativity for RFP's.	4.50	\$3,127.50
05/28/25	AAWT	Review documents for responsiveness and privilege for production to Committee.	4.10	\$2,152.50
05/28/25	AMUE	Meeting with Foley team to provide advice regarding issue concerning discovery.	1.00	\$1,050.00
05/28/25	ASK	Analyze electronic documents for responsiveness and relevance for production to Committee.	0.50	\$325.00
05/28/25	ELJ	Review documents for relevance and privilege.	5.80	\$3,045.00
05/28/25	JCH	Calendar multiple depositions per Committee's Notice of Times, Dates and Locations of Depositions.	0.50	\$165.00

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05/28/25	JMBE	Continue conducting document review to determine the responsiveness to the Committee's requests.	2.60	\$1,560.00
05/28/25	JMT	Confer with review team regarding push to issue a production (1.4); conduct quality control and assist with review (3.7); assist team with document review (5.1); confer with team regarding the status of the production (1.1).	11.30	\$9,887.50
05/28/25	MADR	Correspond with T. Dolcourt regarding priest interviews.	0.10	\$60.00
05/28/25	MADR	Revise call notes with Fr. Seamus of St. Bede.	0.20	\$120.00
05/28/25	MADR	Review documents for privilege and responsiveness to Committee's subpoena.	3.40	\$2,040.00
05/28/25	MADR	Privileged call with Fr. Seamus of St. Bede regarding requests for production.	0.40	\$240.00
05/28/25	MCM	Quality-control review of pending production of email correspondence and internal documents prior to same (2.0); attention to issues raised by review team in connection with same (.5); meeting with Foley team to discuss production issues, review, and next steps (.8); review email correspondence regarding projected totals for Thursday production to Committee of client documents (.3).	3.60	\$3,330.00
05/28/25	MDL	Telephone conference with S. Moses regarding privilege questions arising in RCC deposition.	0.30	\$262.50
05/28/25	MDL	Strategize with Foley team regarding document production, review, and privilege issues.	2.30	\$2,012.50
05/28/25	MR	Analyze documents for responsiveness to requests from Committee.	2.80	\$2,226.00
05/28/25	MRL	Confer with M. Mitcham, M. Moore, and M. Thomas regarding status of the document review process (.4); continue analyzing documents for second review to make production to the Committee (8.3).	8.70	\$5,872.50
05/28/25	MRM	Analyze documents for privilege and responsiveness.	7.60	\$5,130.00
05/28/25	NSCO	Analyze documents responsive to discovery requests.	7.10	\$4,082.50

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05/28/25	SKHE	Review documents for responsiveness and issues for production to Committee.	4.00	\$2,580.00
05/28/25	TND	Update list of priest contacts (.2); emails with A. Castro regarding same (.2); call with M. Thomas regarding document review needs (.4); review documents for production to Committee (1.3).	2.10	\$1,680.00
05/29/25	AAG	Conduct document review in Relativity for RFP's.	6.10	\$4,239.50
05/29/25	AAG	Teleconference with M. Rofoil to discuss document review for saved search set.	0.20	\$139.00
05/29/25	ASK	Analyze electronic documents for responsiveness and relevance for production to Committee.	3.70	\$2,405.00
05/29/25	ELJ	Review documents for relevance and privilege.	0.80	\$420.00
05/29/25	JMBE	Conduct document review to determine responsiveness to the Committee's requests.	1.60	\$960.00
05/29/25	JMT	Continue quality controlling document review (3.3); confer with team regarding final document review (.6).	3.90	\$3,412.50
05/29/25	MADR	Review documents for responsiveness to Committee's subpoena.	0.20	\$120.00
05/29/25	MCM	Quality-control document review prior to final anticipated production of email correspondence and internal documents (.5); email and telephone communications with review team members regarding production and other issues (.5); conference call with M. Thomas regarding discovery matters (.3).	1.30	\$1,202.50
05/29/25	MR	Analyze documents for responsiveness to requests from Committee.	3.40	\$2,703.00
05/29/25	MRL	Confer with M. Mitcham and M. Thomas regarding status of the document review process (.4); continue analyzing documents for second review to make production to the Committee (2.9); confer with A. Gifford regarding reviewing certain documents (.2); analyze documents for quality check before making production (1.3).	4.80	\$3,240.00
05/29/25	MRM	Analysis of documents for privilege and relevance.	9.60	\$6,480.00
05/29/25	NSCO	Analyze for production responsive documents.	0.60	\$345.00

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05/29/25	SJM	Attention to questions regarding production of pre-petition settlement agreements.	0.40	\$350.00
05/29/25	TND	Further document review for production to Committee.	2.90	\$2,320.00
05/30/25	AMUE	Provide advice to Foley team regarding privileged issue concerning documents to be produced.	1.20	\$1,260.00
05/30/25	JMT	Confer with team regarding status of document review (1.1); assist with finalizing document production (2.3).	3.40	\$2,975.00
05/30/25	KAFA	Analysis of emails regarding document productions to Committee (.2); update document production log (.2).	0.40	\$180.00
05/30/25	MCM	Analysis of client documents for quality control purposes prior to production of same (1.8); prepare for deposition of Bishop Barber scheduled for June 3 in San Francisco (1.7); analysis of privilege and other issues in connection with productions (.7).	4.20	\$3,885.00
05/30/25	MRL	Confer with S. Hecimovich regarding reviewing documents to make production (.1); continue analyzing documents for second review to make production to the Committee (4.1).	4.20	\$2,835.00
05/30/25	MRM	Analyze documents for responsiveness and privilege for production to Committee.	11.70	\$7,897.50
05/30/25	SJM	Respond to Committee emails regarding document claw-backs.	0.20	\$175.00
05/30/25	SKHE	Review documents for responsiveness and issues for production to Committee.	3.40	\$2,193.00
05/30/25	TND	Further document review for production to Committee.	0.90	\$720.00
05/31/25	JMT	Address conflicts and finalizing production (4.6); confer with team regarding key documents and issues related to same (1.1); review documents for production (2.4).	8.10	\$7,087.50
05/31/25	MCM	Analysis of privilege issues in connection with production of client documents to Committee (.7); telephone conference with Foley team regarding same (.5); prepare for deposition of Bishop Barber in San Francisco scheduled for June 3 (1.0).	2.20	\$2,035.00

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05/31/25	MDL	Strategize with Foley team regarding privileged document issue.	1.20	\$1,050.00
05/31/25	MRL	Continue analyzing documents for second review to make production to the Committee.	1.20	\$810.00
05/31/25	MRM	Analyze documents for privilege and responsiveness.	7.10	\$4,792.50
05/31/25	TND	Further review of documents (.1); email correspondence with A. Kmeid regarding priest contacts and follow up (.1).	0.20	\$160.00
Task Total:			941.40	\$709,582.50

035 General Counsel Matters

05/04/25	LPM	Prepare construction contract forms for use on future RCBO projects at the request of S. Martinez.	4.10	\$3,341.50
05/12/25	LPM	Prepare for (.6) and attend (1.0) call with client to review construction contract form agreement.	1.60	\$1,304.00
05/14/25	LPM	Revise construction contract forms based on discussion with client.	0.90	\$733.50
05/15/25	MCM	Analysis of issues in connection with potential parish facilities use agreement during bankruptcy case.	0.60	\$555.00
05/29/25	LPM	Analyze documents provided by client relating to audit.	0.20	\$163.00
Task Total:			7.40	\$6,097.00

037 Financing

05/02/25	HMF	Attention to RCC financing.	0.50	\$550.00
05/02/25	JWGO	Revise loan document (1.1); correspond with M. Lee regarding same (.2).	1.30	\$1,059.50
05/02/25	MDL	Strategize regarding additional terms for RCC exit facility.	0.50	\$437.50
05/05/25	MDL	Telephone conference with Hilco representatives regarding additional valuation work.	1.00	\$875.00

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05/05/25	SJM	Meeting with M. Lee and Hilco regarding scope of work.	1.10	\$962.50
05/06/25	MDL	Analyze changes to exit facility credit agreement.	0.80	\$700.00
05/06/25	MDL	Evaluate exit facility loan facility collateral.	0.40	\$350.00
05/07/25	MCM	Analyze cash-flow forecasts for Debtor.	0.50	\$462.50
05/08/25	HMF	Conference with M. Lee and J. Gordon regarding draft RCC credit agreement.	0.40	\$440.00
05/08/25	JWGO	Analyze exit facility (1.0); correspond with various parties regarding same (.5).	1.50	\$1,222.50
05/08/25	MDL	Telephone conference with H. Furlong and J. Gordon regarding revisions to exit facility documents.	0.50	\$437.50
05/08/25	MDL	Evaluate exit facility collateral issues.	0.30	\$262.50
05/13/25	MDL	Strategize for loan collateral evaluations and site visits.	0.40	\$350.00
05/14/25	MDL	Email exchange with D. Flanagan regarding loan collateral issues.	0.20	\$175.00
05/14/25	MDL	Email exchange with Hilco personnel regarding commencement of appraisal work.	0.20	\$175.00
05/15/25	MDL	Revise list of exit facility collateral.	0.90	\$787.50
05/15/25	MDL	Email exchange with D. Flanagan (VeraCruz) regarding revised list of exit facility collateral.	0.20	\$175.00
05/17/25	MDL	Email correspondence with client leadership regarding revised RCC loan collateral list.	0.30	\$262.50
05/18/25	MDL	Email exchange with M. Kaplan regarding property inspections for real estate appraisers.	0.20	\$175.00
05/19/25	HMF	Correspondence regarding OPF loan status.	0.20	\$220.00
05/21/25	MDL	Email correspondence with J. Satter and A. Zimmerman (both of Hilco) regarding property inspections for expert reports.	0.20	\$175.00
05/22/25	HMF	Conferences regarding RCC exit facility (.7); prepare for same (.5).	1.20	\$1,320.00
05/22/25	JWGO	Analyze exit facility.	0.50	\$407.50

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05/22/25	MDL	Telephone conference with Foley, Norton Rose, and RCC personnel to discuss revisions to exit facility credit agreement.	0.70	\$612.50
05/22/25	MDL	Telephone conference with Hilco, Lowenstein, and Stout representatives to discuss property inspections.	0.30	\$262.50
05/23/25	HMF	Review documentation regarding RCC exit loan (.5); participate in conference call regarding same (.5); correspondence regarding same (.3).	1.30	\$1,430.00
05/23/25	JWGO	Revise exit facility (1.3); correspond with various parties regarding filing (.4).	1.70	\$1,385.50
05/23/25	MDL	Email exchange with R. Manns (Norton Rose Fulbright) regarding revisions to RCC loan documents.	0.50	\$437.50
05/23/25	MDL	Analyze RCC revisions to credit agreement.	0.80	\$700.00
05/23/25	SJM	Email correspondence with J. Gordon regarding finalizing draft exit facility documents for plan supplement.	0.50	\$437.50
Task Total:			19.10	\$17,247.50

038 Mediation

05/01/25	EPM	Participate in Zoom mediation session (.8); draft summary of same (.4).	1.20	\$1,008.00
05/01/25	MCM	Participate in insurance mediation with various insurers and mediators (.8); draft email update to Foley team regarding same (.3).	1.10	\$1,017.50
05/15/25	MCM	Email correspondence regarding insurance mediation issues.	0.30	\$277.50
05/30/25	ERR	Telephone call with T. Gallagher regarding status of settlement negotiations.	0.80	\$880.00
Task Total:			3.40	\$3,183.00
Services Total:			1,470.80	\$1,183,009.00

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Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Ashley A. Gifford	AAG	Associate	26.00	\$695.00	\$18,070.00
Alexander A. Witz	AAWT	Associate	29.70	\$525.00	\$15,592.50
Aleyda P. Castro	APCA	Associate	7.40	\$635.00	\$4,699.00
Ana Sofia Batista	ASBT	Associate	6.60	\$600.00	\$3,960.00
Amani S. Kmeid	ASK	Associate	38.20	\$650.00	\$24,830.00
Emily L. Juneau	ELJ	Associate	28.00	\$525.00	\$14,700.00
Elizabeth Morales-Saucedo	ELMS	Associate	9.50	\$650.00	\$6,175.00
Hannah L. Andrews	HLAN	Associate	5.10	\$710.00	\$3,621.00
Jacqueline M. Beveridge	JMBE	Associate	21.90	\$600.00	\$13,140.00
Joseph S. Harper	JSH	Associate	0.30	\$800.00	\$240.00
Loring E. Telleen	LET	Associate	10.60	\$650.00	\$6,890.00
Mary Driscoll	MADR	Associate	22.30	\$600.00	\$13,380.00
Mason Roberts	MR	Associate	39.40	\$795.00	\$31,323.00
Mary Rofaail	MRL	Associate	114.70	\$675.00	\$77,422.50
Mikaela R. Mitcham	MRM	Associate	115.70	\$675.00	\$78,097.50
Michael W. Berg	MWBE	Associate	32.10	\$600.00	\$19,260.00
Nora McGuffey	NMCG	Associate	14.00	\$700.00	\$9,800.00
Nicholas S. Covek	NSCO	Associate	27.00	\$575.00	\$15,525.00
Sydney K. Hecimovich	SKHE	Associate	46.90	\$645.00	\$30,250.50
Stephanie McPhail	SMP	Associate	8.20	\$775.00	\$6,355.00
Alissa M. Nann	AMN	Of Counsel	10.90	\$1,050.00	\$11,445.00
Shane J. Moses	SJM	Of Counsel	162.90	\$875.00	\$142,537.50
Janelle C. Harrison	JCH	Paralegal	18.50	\$330.00	\$6,105.00
Kerry A. Farrar	KAFA	Paralegal	12.30	\$450.00	\$5,535.00
Wendy DelValle	WD	Paralegal	0.60	\$435.00	\$261.00
Ann Marie Uetz	AMUE	Partner	139.00	\$1,050.00	\$145,950.00
Emil P. Khatchatourian	EPK	Partner	7.30	\$875.00	\$6,387.50
Eileen R. Ridley	ERR	Partner	20.10	\$1,100.00	\$22,110.00
Geoffrey S. Goodman	GSG	Partner	21.00	\$1,050.00	\$22,050.00
Heidi M. Furlong	HMF	Partner	3.60	\$1,100.00	\$3,960.00
Jason N. Barglow	JBA	Partner	1.40	\$1,150.00	\$1,610.00
Jason J. Kohout	JKK	Partner	1.30	\$975.00	\$1,267.50
Jonathan Michael Thomas	JMT	Partner	135.30	\$875.00	\$118,387.50
Jeff R. Blease	JRBL	Partner	2.10	\$1,375.00	\$2,887.50
Lisa F. Glahn	LFG	Partner	2.20	\$1,200.00	\$2,640.00
Mark C. Moore	MCM	Partner	112.40	\$925.00	\$103,970.00
Matthew D. Lee	MDL	Partner	59.70	\$875.00	\$52,237.50
Thomas F. Carlucci	TFCA	Partner	26.30	\$1,375.00	\$36,162.50
Kaylee Soroka	KASO	Project Assistant	1.40	\$290.00	\$406.00
Elizabeth P. Mazzocco	EPM	Senior Counsel	23.40	\$840.00	\$19,656.00

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Jake W. Gordon	JWGO	Senior Counsel	5.00	\$815.00	\$4,075.00
Laura P. Mikeworth	LPM	Senior Counsel	6.80	\$815.00	\$5,542.00
Robert T. Stewart	RTST	Senior Counsel	9.30	\$825.00	\$7,672.50
Tamar N. Dolcourt	TND	Special Counsel	82.70	\$800.00	\$66,160.00
Nicole Kassabian	NIKA	Summer Associate	1.70	\$390.00	\$663.00
Totals			1,470.80		\$1,183,009.00

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$389.22
LSS - eDiscovery Services	\$11,000.00
Meals	\$224.96
Other Fees	\$328.00
Expenses Incurred Total	\$11,942.18

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.

ROMAN CATHOLIC BISHOP OF OAKLAND

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Foley & Lardner LLP

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Expense Detail**Electronic Legal Research Services**

Date	Initials	Description	Amount
05/31/25	WD	DOCKET REPORT. SEARCH. Westlaw.	\$389.22

LSS - eDiscovery Services

Date	Initials	Description	Amount
05/31/25	JRBL	LSS - eDiscovery Services.	\$11,000.00

Meals

Date	Initials	Description	Amount
05/28/25	ASD	VENDOR: U.S. BANK - 05/28/25 Lunch for deposition of 30(b)(6) rep of RCC, San Francisco (7 attendees).	\$90.10
05/28/25	22902	VENDOR: U.S. BANK - 05/28/25 Lunch for deposition of D. Flanagan, Detroit (6 attendees).	\$134.86
			<hr/> \$224.96

Other Fees

Date	Initials	Description	Amount
05/31/25	23626	Certificate of Good Standing--VENDOR: U.S. BANK 04/29/25 pro hac vice motion for Michael Thomas. -.	\$328.00

Expense Total:	<hr/> \$11,942.18
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FOLEY & LARDNER LLP
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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: July 30, 2025
Invoice No.: 51114233
Our Ref. No.: 100845-0402

Services through June 30, 2025

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	\$629,638.50
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Total Expenses:	\$19,117.97
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Amount Due:	\$648,756.47
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Please reference your invoice number 51114233 with your remittance
payable to Foley & Lardner LLP. Payment is due promptly upon receipt
of our invoice.

Federal Employer Number:
39-0473800

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Foley & Lardner LLP

July 30, 2025

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

06/06/25	MDL	Strategize for 363 motion regarding CMS interest.	0.20	\$175.00
06/12/25	AMN	Discuss 363 motion regarding non-debtor equity contributions with M. Berg (.1), and related correspondence with M. Lee (.2); review underlying documents regarding contribution by cemeteries entity (.5).	0.80	\$840.00
06/13/25	AMN	Correspondence with M. Lee regarding 363 motion.	0.20	\$210.00
06/17/25	AMN	Attention to form 363 motion and order for motion to release interests in CCSS (.5); begin to draft motion (.5).	1.00	\$1,050.00
06/17/25	MWBE	Attention to motion to approve 363 sale.	0.70	\$420.00
06/18/25	AMN	Call with M. Lee and S. Moses regarding 363 motion to release interests in CCSS (.9); review pledge agreements, service contract and letter from Debtor regarding same (.6).	1.50	\$1,575.00
06/18/25	MDL	Strategize with A. Nann and S. Moses for 363 motion on divestment of CMS entity.	0.90	\$787.50
06/18/25	MWBE	Follow up regarding 363 motion and proposed order.	0.20	\$120.00
06/24/25	AMN	Draft 363 motion regarding release of Debtor's interests in CCSS.	1.00	\$1,050.00
06/25/25	AMN	Draft 363 motion regarding release of Debtor's interests in CCSS.	3.00	\$3,150.00
06/26/25	AMN	Draft 363 motion regarding interests in CCSS.	2.00	\$2,100.00
Task Total:			11.50	\$11,477.50

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July 30, 2025

003 Automatic Stay

06/25/25	EPK	Email correspondence with M. Lee regarding the Committee's renewed lift stay motion and related issues raised in the May 2025 JCCP 5108 CMC.	0.40	\$350.00
06/25/25	MDL	Email exchange with Committee counsel regarding amount of time provided by Committee to object to renewed lift stay motion.	0.10	\$87.50
06/25/25	MDL	Further analyze Committee's renewed motion to lift the automatic stay and supporting materials.	0.50	\$437.50
06/25/25	MDL	Strategize regarding notice and objection deadline issue on Committee's renewed lift stay motion.	0.20	\$175.00
06/25/25	MRL	Analyze the Committee's motion for relief from the automatic stay.	0.20	\$135.00
06/25/25	SJM	Initial review of Committee renewed motion for relief from stay.	0.70	\$612.50
06/26/25	EPK	Review the Committee's renewed motion for stay relief to set certain actions coordinated in JCCP 5108 for trial (.2); email correspondence with M. Lee and A. Ouellette regarding strategy for RCBO's response to same (.1).	0.30	\$262.50
06/26/25	ERR	Briefly review motion to lift stay.	0.70	\$770.00
06/26/25	MDL	Analyze Committee's renewed motion to lift automatic stay and supporting materials.	0.30	\$262.50
06/26/25	MRL	Email correspondence with the Foley team regarding the Committee's motion for relief from stay.	0.40	\$270.00
06/27/25	MDL	Strategize with Foley team regarding response to Committee's renewed lift stay motion.	0.70	\$612.50
06/27/25	MRL	Analyze the Committee's motion for relief from stay (.5); confer with the Foley team regarding strategies for the Debtor's response to the motion (.7).	1.20	\$810.00
06/29/25	MRL	Draft the application to extend time to respond to the Committee's motion for relief from stay.	0.30	\$202.50
06/30/25	MRL	Continue drafting the application to extend time to respond to the Committee's motion for relief from stay.	1.60	\$1,080.00

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Foley & Lardner LLP

July 30, 2025

06/30/25	SJM	Revise draft application to continue hearing on Committee's renewed lift stay hearing.	2.20	\$1,925.00
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Task Total:	9.80	\$7,992.50
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004 Bankruptcy Litigation/Adversary Proceedings

06/01/25	GSG	Review draft of motion to dismiss in restricted assets case (.6); edit same (.8); correspondence with M. Kemner regarding same (.2).	1.60	\$1,680.00
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06/01/25	MWBE	Draft reply in support of motion to dismiss adversary complaint.	1.70	\$1,020.00
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06/01/25	MWBE	Further edits to reply in support of motion to dismiss adversary proceeding per G. Goodman.	0.50	\$300.00
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06/01/25	SJM	Continue drafting reply in support of motion to dismiss bond-obligated group complaint (7.5); research in support of same (1.9).	9.40	\$8,225.00
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06/02/25	GSG	Review draft of motion to dismiss alter ego complaint (.5); edit same (.4); correspondence with M. Kemner regarding same (.2).	1.10	\$1,155.00
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06/02/25	JCH	Finalize (.2) and file (.3) replies in support of Debtor's motions to dismiss in both adversary proceedings.	0.50	\$165.00
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06/02/25	MWBE	Review reply in support of motion to dismiss (.7); research and notes on lawyer as witness issue per A. Uetz (.9).	1.60	\$960.00
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06/02/25	SJM	Continue to draft reply in support of motion to dismiss Committee alter ego complaint (3.9); final revisions to same (.6); final revisions to motion to dismiss Committee restricted assets complaint (.3).	4.80	\$4,200.00
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06/03/25	MWBE	Follow up with A. Uetz regarding various motion- and hearing-related issues.	0.10	\$60.00
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06/04/25	MWBE	Research on charitable trust settlors per S. Moses.	0.30	\$180.00
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06/06/25	JCH	Calendar oral ruling on motions to dismiss in adversary proceedings and related deadline to file pleadings.	0.20	\$66.00
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06/06/25	RTS	Analysis with M. Thomas regarding status of case and recommended courses of action.	0.10	\$87.50
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Foley & Lardner LLP

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06/24/25	SJM	Begin work on drafting answer to Committee amended restricted assets complaint.	2.20	\$1,925.00
06/26/25	SJM	Continue drafting answer to Committee's amended restricted assets complaint.	2.40	\$2,100.00
06/30/25	SJM	Revise answer to restricted assets complaint to include affirmative defenses.	0.80	\$700.00

Task Total: 27.30 \$22,823.50

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

06/10/25	JCH	Provide copies of claims and Amended Schedules E/F to M. Lee.	0.20	\$66.00
06/13/25	MCM	Analysis of claims issue raised by Committee at A. Bardos deposition vis-a-vis potential settlements pre-bankruptcy.	0.60	\$555.00

Task Total: 0.80 \$621.00

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

06/02/25	JCH	Update daily docket report.	0.50	\$165.00
06/03/25	EPK	Supervisory review of proposed changes and updates to the master case calendar and key dates timeline, including litigation schedules and discovery items.	0.20	\$175.00
06/03/25	JCH	Update Timeline and Master Case Calendar (.5); update daily docket report (.5).	1.00	\$330.00
06/03/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.50	\$400.00
06/04/25	JCH	Circulate updated Timeline and Master Case Calendar (.2); update daily docket report (.5).	0.70	\$231.00
06/04/25	JSH	Communications with J. Harrison regarding updates to weekly timeline and slides.	0.20	\$160.00
06/04/25	SJM	Attention to docketing of confirmation and discovery matters.	0.50	\$437.50

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06/05/25	JCH	Finalize (.6) and file (.2) application to employ expert witness and declarations in support; update daily docket report (.5).	1.30	\$429.00
06/06/25	JCH	Update daily docket report.	0.50	\$165.00
06/09/25	EPK	Review material updates to the master case calendar and plan confirmation timeline.	0.10	\$87.50
06/09/25	JCH	File periodic report regarding Furrer Properties (.2); update daily docket report (.5); prepare and file notice of service list as of June 9, 2025 (.2); finalize and file Debtor's post-hearing statement (.5).	1.40	\$462.00
06/10/25	JCH	Update daily docket report.	0.50	\$165.00
06/10/25	MRL	Revise the confirmation calendar to provide an update to the Foley team (.4); confer with M. Moore regarding the same (.1).	0.50	\$337.50
06/11/25	JCH	Calendar updated deadlines pursuant to order entered (.5); emails to A. Uetz regarding updated deadlines (.5); update daily docket report (.5).	1.50	\$495.00
06/12/25	JCH	Update daily docket report.	0.50	\$165.00
06/13/25	JCH	File Verita monthly fee statement for April 2025 (.2); update daily docket report (.5).	0.70	\$231.00
06/16/25	JCH	Update daily docket report.	0.50	\$165.00
06/17/25	JCH	Update daily docket report.	0.50	\$165.00
06/18/25	JCH	Update daily docket report.	0.50	\$165.00
06/20/25	JCH	Update daily docket report.	0.50	\$165.00
06/26/25	MDL	Participate in meeting with Judge Lafferty and Committee counsel regarding confirmation hearing logistics (.7); follow up on same (.2).	0.90	\$787.50
06/26/25	SJM	Attend meeting with Committee counsel, M. Lee, and court regarding logistics for confirmation trial.	0.70	\$612.50
06/30/25	JCH	Update daily docket report.	0.50	\$165.00
Task Total:			14.70	\$6,660.50

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007 Chapter 11 Plan/ Plan Confirmation

06/01/25	TFCA	Review portions of petition and CA right to privacy information in preparation for call (.6); attend call regarding privilege issue with Foley and M. Kemner (.6); review M. Moore draft regarding same and provide comments and edits (.3); review documents to prepare for Bishop Barber deposition (2.0); review emails from A. Uetz regarding notes for same (.2); review second production of email to prepare deposition outline for Bishop Barber (2.0).	5.70	\$7,837.50
06/02/25	GSG	Review materials in preparation for L. Oberempt deposition prep session (.6); participate in L. Oberempt deposition prep session (1.3).	1.90	\$1,995.00
06/02/25	KASO	Cite check and review document for M. Berg.	1.00	\$290.00
06/02/25	MDL	Email exchange with A. Zimmerman and J. Satter (Hilco) regarding site visits to church properties.	0.20	\$175.00
06/02/25	MDL	Evaluate Immediate Payment and RCWC release elections and impact of same on confirmation.	0.90	\$787.50
06/02/25	MRL	Email correspondence with D. Martin regarding a call to discuss the analysis for the hearing.	0.20	\$135.00
06/02/25	SJM	Assist with preparation for 6/3 depositions.	0.70	\$612.50
06/02/25	SJM	Assist with preparation of Bishop Barber for deposition (.4); prepare for L. Oberempt deposition prep meeting (.9); meeting with G. Goodman and L. Oberempt regarding deposition preparation (1.4).	2.70	\$2,362.50
06/02/25	TFCA	Review documents for deposition prep (1.0); attend deposition prep (8.3); review follow-up emails from A. Uetz (.2).	9.50	\$13,062.50
06/03/25	AMUE	Prepare for deposition of Bishop Barber (1.3); appearance at deposition of Bishop Barber (5.2) (partial).	6.50	\$6,825.00
06/03/25	GSG	Participate in L. Oberempt deposition (2.5); meet with L. Oberempt and team after same (.4); review D. Flanagan correspondence regarding restricted assets (.2); telephone conference with D. Flanagan, L. Oberempt and A&M regarding restricted assets (.9).	4.00	\$4,200.00

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Foley & Lardner LLP

July 30, 2025

06/03/25	MCM	Attend deposition of Bishop Barber in RCBO bankruptcy case (partial).	6.00	\$5,550.00
06/03/25	MCM	Meeting with expert witness regarding analysis and draft expert report on confirmation issues (.8); email correspondence with A&M team regarding meeting scheduled for June 5 (.2).	1.00	\$925.00
06/03/25	MDL	Email exchange with A. Zimmerman and J. Satter (both of Hilco) regarding property visits by appraisers.	0.10	\$87.50
06/03/25	MRL	Call with the Foley team and D. Martin regarding an analysis update for the expert reports.	0.60	\$405.00
06/03/25	SJM	Call with G. Goodman, L. Oberempt, and D. Flanagan regarding restricted asset substantiation update.	0.90	\$787.50
06/03/25	SJM	Draft email to K. Martens regarding expert report.	0.80	\$700.00
06/03/25	TFCA	Attend deposition of Bishop Barber.	7.00	\$9,625.00
06/04/25	AMUE	Communications with C. Moore regarding expert report matter (.6); analyze privileged issue concerning expert report for C. Moore (.7).	1.30	\$1,365.00
06/04/25	MCM	Analyze email correspondence from Committee counsel requesting claims information on Class 3 claims that was already provided to same (.5); analysis of impact of voting record deadline on potential claim objections by Committee aimed at defeating Class 3 acceptance (.4).	0.90	\$832.50
06/04/25	MCM	Revise declaration regarding voting summary and related issues.	0.50	\$462.50
06/04/25	MDL	Email exchange with A. Zimmerman and J. Satter (both of Hilco) regarding property inspections and access.	0.70	\$612.50
06/04/25	SJM	Attention to preparation for 6/5 depositions, including email correspondence with various parties regarding remote participation.	0.60	\$525.00
06/04/25	SJM	Email correspondence with counsel for insurers regarding upcoming depositions.	0.40	\$350.00

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06/05/25	JMT	Confer with team regarding statement requested by the court regarding 30(b)(6) deposition (.7); defend deposition of Adventus corporate representative (.6).	1.30	\$1,137.50
06/05/25	MCM	Meeting with expert witness regarding analysis and draft expert report on confirmation issues.	0.80	\$740.00
06/05/25	MCM	Revise declaration regarding solicitation service with related exhibits (.7); analyze issues regarding filing certain documents under seal to protect abuse-claim information (.5).	1.20	\$1,110.00
06/05/25	MCM	Analysis of Committee request for adjustment to expert-discovery schedule and related issues (.3); email correspondence with Foley team regarding same (.3).	0.60	\$555.00
06/05/25	MDL	Appear for RCBO at Adventus/OPF deposition (only stayed for part of the deposition).	2.20	\$1,925.00
06/05/25	MDL	Prepare for Adventus/OPF deposition.	0.30	\$262.50
06/05/25	MDL	Correspondence with A. Zimmerman and J. Satter regarding revised deadlines for expert reports.	0.10	\$87.50
06/05/25	SJM	Assist with preparation for 6/5 depositions (.7); attend deposition of RCWC (2.8).	3.50	\$3,062.50
06/06/25	GSG	Telephone conference with A&M, D. Flanagan, and L. Oberempts regarding restricted assets (1.4); follow-up telephone conference with Foley team regarding same (.5); telephone conference with S. Moses regarding K. Martens and canon law report (.1).	2.00	\$2,100.00
06/06/25	JCH	Email correspondence with Verita and Foley team regarding ballots to be filed with declaration (.5); compile exhibits and file declaration of solicitation and tabulation of votes and Class 4 ballots under seal (.5).	1.00	\$330.00
06/06/25	MCM	Analysis of prior expert reports of anticipated Committee expert witnesses in connection with confirmation (.6); conference call regarding restricted asset analysis with Foley team and client parties (.7).	1.30	\$1,202.50
06/06/25	MCM	Finalize declaration in support of solicitation and related exhibits.	0.80	\$740.00

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06/06/25	MDL	Telephone conference with A&M (C. Moore, S. Levitt) regarding scope of expert report.	1.40	\$1,225.00
06/06/25	MDL	Email exchange with Hilco team regarding update on property inspections.	0.20	\$175.00
06/06/25	MDL	Strategize with S. Moses regarding rebuttal expert disclosures.	0.40	\$350.00
06/06/25	SJM	Call with G. Goodman regarding expert report issues (.1); call with M. Lee regarding same (.2); revise email to K. Martens regarding expert report (.3).	0.60	\$525.00
06/06/25	SJM	Assist with finalizing ballot tabulation declaration.	0.60	\$525.00
06/06/25	SJM	Call with client representatives (for part), G. Goodman, M. Lee, C. Moore, M. Moore, and S. Levitt regarding issues related to plan confirmation evidence (1.9); follow up on same (.3).	2.20	\$1,925.00
06/09/25	AMUE	Meeting with Hilco team regarding privileged matter.	1.00	\$1,050.00
06/09/25	MCM	Email correspondence with expert witness regarding liquidation analysis and follow-up on related issues (.5); prepare for meeting with NERA regarding analysis (.4); analysis of issues regarding liquidation analysis, projections, and expert testimony (1.0).	1.90	\$1,757.50
06/09/25	MDL	Telephone conference with Hilco team regarding property inspection results and analysis.	1.00	\$875.00
06/09/25	MDL	Strategize regarding next steps in property appraisal analysis.	0.10	\$87.50
06/09/25	SJM	Call with A. Uetz, M. Lee, and Hilco regarding real property valuations (.8); prepare disclosure of rebuttal experts (.9); revise same based on comments from A. Uetz (.4); review Committee disclosure (.2).	2.30	\$2,012.50
06/10/25	AMUE	Meeting with Hilco team regarding confirmation/real estate issues.	1.00	\$1,050.00
06/10/25	AMUE	Review deposition transcript of D. Flanagan (.7); highlight certain issues for strategy discussion with M. Lee (.5); review certain exhibits from D. Flanagan deposition (.4).	1.60	\$1,680.00

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06/10/25	MCM	Working call with NERA Consulting regarding expert report and analysis and timing of deposition by Committee.	0.70	\$647.50
06/10/25	MDL	Meet with Hilco team regarding property division issues.	1.20	\$1,050.00
06/10/25	MDL	Prepare for meeting with Hilco team regarding property division issues.	0.10	\$87.50
06/10/25	MRL	Call with the Foley team and D. Martin regarding an analysis update for the expert reports.	0.60	\$405.00
06/10/25	SJM	Assist with preparation of A. Bardos for deposition.	0.40	\$350.00
06/10/25	SJM	Meeting with Hilco team and M. Lee regarding real property valuation issues.	1.20	\$1,050.00
06/11/25	AMN	Discuss classification/impairment research issue with S. Moses.	0.50	\$525.00
06/11/25	MCM	Analysis of potential expert report issues based on feedback from same (.6); telephone conference with M. Lee regarding survivors' trust documents and related issues in connection with productions and discovery (.4); analysis of prior expert reports from potential Committee expert witness and internal email correspondence regarding same (.8); email correspondence with expert witness regarding scheduling deadlines (.2).	2.00	\$1,850.00
06/11/25	MWBE	Discuss research assignment with A. Nann.	0.10	\$60.00
06/11/25	MWBE	Begin researching artificial impairment per A. Nann.	0.60	\$360.00
06/11/25	SJM	Call with A. Nann regarding research on classification issues (.6); call with A. Uetz regarding case status (.1).	0.70	\$612.50
06/12/25	AMN	Discuss plan classification research issues with M. Berg.	0.30	\$315.00
06/12/25	AMUE	Provide advice regarding preparing for A. Bardos deposition.	1.20	\$1,260.00
06/12/25	AMUE	Prepare for (.2) and meet with A&M and M. Moore regarding expert report matter (1.3).	1.50	\$1,575.00

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06/12/25	EPK	Email correspondence with S. Levitt of A&M and A. Uetz regarding coordination relating to C. Moore's expert report on restricted asset analysis.	0.20	\$175.00
06/12/25	GSG	Draft communication to A&M and D. Flanagan regarding restricted assets issues.	0.50	\$525.00
06/12/25	MCM	Remote attendance at portion of 30(b)(6) deposition of A. Bardos by Committee.	1.50	\$1,387.50
06/12/25	MCM	Participate in discussion with expert witness and Foley team regarding liquidation analysis and related issues.	1.30	\$1,202.50
06/12/25	MRL	Analyze documents regarding expert reports in other diocese cases.	0.80	\$540.00
06/12/25	MWBE	Discuss plan research assignment with A. Nann (.3); continue research as requested (1.3).	1.60	\$960.00
06/12/25	SJM	Meet with A. Bardos and M. Lee in preparation for deposition (.4); attend Debtor 30(b)(6) deposition (8.1); meet with A. Bardos and M. Lee following first day of deposition in order to prepare for second day (1.8).	10.30	\$9,012.50
06/12/25	SJM	Email correspondence with insurer counsel regarding remote attendance at deposition.	0.20	\$175.00
06/13/25	AMUE	Analyze deposition transcript (D. Flanagan) and exhibits (1.1); communication with M. Lee regarding A. Bardos deposition (.5); analyze privileged issue regarding restricted assets (.9).	2.50	\$2,625.00
06/13/25	EPK	Email correspondence with J. Kohout to coordinate regarding C. Moore's expert report on restricted asset analysis.	0.20	\$175.00
06/13/25	MCM	Reconciliation analysis regarding other case outcomes and documentation supporting same (1.7); follow-up analysis based on issues raised and email correspondence regarding same (.4); email correspondence with A&M team regarding restricted-asset analysis (.4).	2.50	\$2,312.50
06/13/25	MDL	Defend deposition of A. Bardos.	2.80	\$2,450.00
06/13/25	MDL	Strategize with A. Uetz regarding results of fact depositions and priority issues for expert witnesses.	0.30	\$262.50

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06/13/25	MRL	Call with the Foley team and D. Martin regarding an analysis of other dioceses cases for the expert reports.	0.80	\$540.00
06/13/25	MWBE	Confer with S. Moses regarding impairment issue.	0.10	\$60.00
06/13/25	MWBE	Research on impairment criteria and standards.	1.30	\$780.00
06/13/25	SJM	Meet with M. Lee (for part) and A. Bardos to prepare for continued 30(b)(6) deposition (.9); attend continued 30(b)(6) deposition (3.0).	3.90	\$3,412.50
06/13/25	SJM	Meet with Committee counsel and M. Lee regarding open discovery and plan confirmation issues (.7); meet with M. Kaplan regarding scheduling and logistics for plan confirmation hearing (.4).	1.10	\$962.50
06/15/25	MCM	Review rough transcript of A. Bardos deposition by Committee.	1.00	\$925.00
06/16/25	AMUE	Meeting with A&M team regarding expert report (1.0); analyze restricted assets issues (1.1).	2.10	\$2,205.00
06/16/25	EPK	Email correspondence with S. Levitt of A&M regarding initial draft of expert report on restricted cash review and analysis (.3); review restricted cash analysis documents (.6); conference call with A&M and Foley teams to discuss same further (.5); email correspondence with G. Goodman and D. Flanagan of VeraCruz regarding account balance analyses (.2).	1.60	\$1,400.00
06/16/25	JKK	Conference regarding restricted gifts.	0.70	\$682.50
06/16/25	MCM	Analysis of fee issues in connection with projections and liquidation analysis supporting plan (.5); meeting with experts and client parties regarding restricted asset analysis (1.0); further analysis of backup data on other case outcomes (1.4); prepare for deposition of D. Martin as expert witness (.6).	3.50	\$3,237.50
06/16/25	MDL	Email exchange with K. Martens regarding expert report and analysis.	0.20	\$175.00
06/16/25	MRL	Call with I. Velikova regarding example of expert reports (.1); review and analyze the data in the expert reports (.4); correspondence with M. Moore regarding the same (.1).	0.60	\$405.00

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06/16/25	MWBE	Research regarding circuit split on artificial impairment.	1.20	\$720.00
06/16/25	TND	Begin gathering information on state court litigation fees for C. Moore expert declaration.	0.40	\$320.00
06/17/25	EPK	Email correspondence with S. Levitt of A&M regarding updated draft of C. Moore's expert report on restricted cash analysis (.1); email correspondence with Foley bankruptcy team regarding underlying restricted asset, trust, and bank account analysis (.2); conference call with G. Goodman and M. Moore regarding trust assets analysis and related testimony and reports (.5).	0.80	\$700.00
06/17/25	GSG	Telephone conference with E. Khatchatourian and M. Moore regarding restricted assets issues (.4); correspondence with L. Oberempt regarding deposition transcript (.2); review canon law expert issues and restricted assets (.2).	0.80	\$840.00
06/17/25	MCM	Follow-up conference call with E. Khatchatourian and G. Goodman regarding case issues.	0.40	\$370.00
06/17/25	MCM	Analysis of other case outcomes and supporting documentation in connection with expert testimony and report in favor of RCBO plan of reorganization (3.2); review and cross-check against expert backup regarding same subject matter (1.0).	4.20	\$3,885.00
06/17/25	MDL	Strategize with Foley team regarding expert depositions, Daubert motions, and other discovery issues.	0.30	\$262.50
06/17/25	MDL	Email exchange with M. Kaplan regarding expert witness logistics and scheduling issues.	0.20	\$175.00
06/17/25	SJM	Attention to issues regarding deposition review and status of same.	0.60	\$525.00
06/18/25	AMUE	Analyze privileged issues related to contested plan confirmation (2.2); draft privileged memorandum for Foley team regarding same (1.1).	3.30	\$3,465.00

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06/18/25	EPK	Coordinate with M. Moore and A&M team regarding expert reports and related diligence items (.6); email correspondence with D. Flanagan of VeraCruz and J. Pluth of RCBO regarding same (.2); follow-up call with D. Flanagan to discuss status of accounting diligence items for report (.3).	1.10	\$962.50
06/18/25	GSG	Correspondence with S. Levitt regarding restricted assets analysis.	0.10	\$105.00
06/18/25	MCM	Conference call regarding open issues in connection with A&M report (.6); review email correspondence regarding same (.4); prepare for expert deposition of C. Moore for A&M through review of documents (.8).	1.80	\$1,665.00
06/18/25	MDL	Evaluate status of expert report completion.	0.30	\$262.50
06/18/25	MRL	Email correspondence regarding setting a call to discuss expert reports.	0.20	\$135.00
06/18/25	MWBE	Discuss research regarding artificial impairment with A. Nann.	0.50	\$300.00
06/18/25	SJM	Email to M. Kaplan regarding scheduling logistics call with court.	0.20	\$175.00
06/19/25	MCM	Work on issues in connection with professional fee projections and analysis of same.	0.60	\$555.00
06/19/25	MCM	Prepare for and participate in call with NERA experts regarding reconciliation of analysis in connection with expert report.	1.20	\$1,110.00
06/19/25	MDL	Telephone conference with K. Martens and M. Kemner regarding expert analysis and canon law considerations.	1.20	\$1,050.00
06/19/25	MDL	Strategize with S. Moses regarding K. Martens expert report.	0.10	\$87.50
06/19/25	MDL	Telephone conference with J. Satter (Hilco) regarding scope of appraisals on certain properties.	0.30	\$262.50
06/19/25	MRL	Call with the Foley team and D. Martin regarding an analysis of other dioceses cases for the expert reports.	1.30	\$877.50

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06/19/25	MWBE	Continue research regarding artificial impairment and good faith proposals under 1129(a) per A. Nann.	0.50	\$300.00
06/19/25	SJM	Call with M. Lee and K. Martens regarding canon law expert report (1.2); prepare detailed outline of topics to be covered in expert report based on discussion (2.4).	3.60	\$3,150.00
06/20/25	EPK	Email correspondence with S. Levitt of A&M regarding status of projections and liquidity issues for expert report (.2); analyze privileged expert issues (.7); email correspondence with J. Pluth regarding trial balances for Parochial Fund transactions (.3); email correspondence with G. Goodman regarding Parochial Fund transaction accounting diligence (.2); emails with D. Flanagan of VeraCruz regarding same (.2); further analysis of privileged expert report items (.6); email correspondence with M. Moore to coordinate with respect to same (.2).	2.40	\$2,100.00
06/20/25	GSG	Review correspondence regarding restricted funds analysis (.1); correspondence with E. Khatchatourian regarding same (.1).	0.20	\$210.00
06/20/25	MCM	Further analysis of professional fee projections and related issues in connection with confirmation.	2.00	\$1,850.00
06/20/25	MDL	Evaluate plan confirmation strategy.	0.60	\$525.00
06/20/25	MDL	Email exchange with J. Satter (Hilco) regarding scope of appraisal at specific church properties.	0.10	\$87.50
06/20/25	MWBE	Continue research regarding artificial impairment and good faith proposals under 1129(a) per A. Nann.	0.70	\$420.00
06/21/25	EPK	Email correspondence with C. Moore of A&M regarding privileged expert report issues (.4); review relevant deposition testimony relating to restricted asset analysis (1.7); email correspondence with J. Pluth and D. Flanagan of VeraCruz regarding privileged analysis for plan confirmation (.2).	2.30	\$2,012.50
06/21/25	MCM	Attention to email correspondence in connection with various expert reports due 6/30.	0.50	\$462.50

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06/22/25	EPK	Follow-up email correspondence with J. Pluth of RCBO, D. Flanagan of VeraCruz, and S. Levitt of A&M regarding accounting analysis for plan confirmation (.2); separate email correspondence with S. Levitt of A&M regarding privileged analysis for plan valuation issues (.1).	0.30	\$262.50
06/22/25	MDL	Strategize with M. Moore regarding vote designation and class count issues.	0.40	\$350.00
06/23/25	AMN	Discuss impairment/classification plan research with M. Berg.	0.50	\$525.00
06/23/25	AMUE	Outline tasks related to contested plan confirmation to prioritize what is needed to achieve confirmation (1.2); communications with Foley team regarding same (.4).	1.60	\$1,680.00
06/23/25	GSG	Review outline regarding topics for K. Martens' report (.3); telephone conference with S. Moses and M. Lee regarding same (.3); correspondence with R. Manns regarding OPF issues (.1).	0.70	\$735.00
06/23/25	MDL	Revise outline for K. Martens' report.	0.20	\$175.00
06/23/25	MDL	Telephone conference with D. Flanagan regarding real estate to be sold to support plan.	0.40	\$350.00
06/23/25	MDL	Strategize with G. Goodman and S. Moses regarding K. Martens' expert report and restricted funds analysis.	0.40	\$350.00
06/23/25	MWBE	Discuss state of research regarding artificial impairment and good faith classification with A. Nann (.4); finish initial research on artificial impairment and good faith classification and share with A. Nann as discussed (3.9).	4.30	\$2,580.00
06/23/25	SJM	Email correspondence with M. Lee regarding outline of topics for K. Martens' expert report (.2); Call with G. Goodman and M. Lee regarding same (.4); finalize outline (.3); email to K. Martens regarding same (.3); email to K. Martens regarding background documents (.3).	1.50	\$1,312.50
06/24/25	AMN	Review summary of impairment and classification research (.5); related correspondence with S. Moses (.3).	0.80	\$840.00

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06/24/25	EPK	Email correspondence with S. Levitt of RCBO regarding status of restricted asset analysis for expert report (.1); conference call with C. Moore and S. Levitt of A&M to discuss restricted asset analysis accounting (.7); email correspondence with Foley bankruptcy team regarding cash projections and liquidation analysis issues (.1); email correspondence with C. Moore and S. Levitt of A&M regarding same (.1).	1.00	\$875.00
06/24/25	MDL	Email exchange with S. Marciniak (Hanson Bridgett) regarding readl estate matter.	0.20	\$175.00
06/24/25	MDL	Email exchange with J. Satter (Hilco) regarding expert report facts and background needed.	0.20	\$175.00
06/24/25	MRL	Review email correspondence from I. Velikova regarding the expert report (.2); analyze documents regarding the same (.1).	0.30	\$202.50
06/24/25	MWBE	Begin draft of memo summarizing research on artificial impairment and classification issues.	0.80	\$480.00
06/24/25	SJM	Attention to arranging conference with court and Committee to discuss logistics for plan confirmation hearing.	0.60	\$525.00
06/24/25	SJM	Analyze issues regarding creditor classification based on research (1.2); email to A. Nann abd M. Berg regarding additional issues related to same (.2).	1.40	\$1,225.00
06/25/25	AMN	Discuss classification research with M. Berg.	0.20	\$210.00
06/25/25	EPK	Coordination email correspondence with S. Levitt of A&M regarding privileged donor-restricted asset issues.	0.10	\$87.50
06/25/25	GSG	Review status of K. Martens' report (.2); correspondence with S. Moses regarding same (.2).	0.40	\$420.00
06/25/25	MCM	Attention to expert report issues with NERA Consulting prior to submission of final reports.	0.80	\$740.00
06/25/25	MDL	Telephone conference with A&M, Hilco, and VeraCruz personnel to discuss real estate valuation and factors impacting best interest test and feasibility (.8); follow up on same (.2).	1.00	\$875.00

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06/25/25	MWBE	Finish first draft of memo summarizing research on artificial impairment and classification issues.	2.70	\$1,620.00
06/25/25	SJM	Call with G. Albert regarding structure for call with court regarding confirmation trial logistics (.2); email correspondence with courtroom deputy regarding same (.3).	0.50	\$437.50
06/25/25	SJM	Meeting with A&M, Hilco, D. Flanagan, and M. Lee regarding expert report matters.	0.80	\$700.00
06/26/25	AMN	Review memo regarding classification and impairment.	1.00	\$1,050.00
06/26/25	MDL	Evaluate key facts to be shared with Hilco regarding Livermore property re-zoning effort.	0.20	\$175.00
06/26/25	MRL	Revise the expert report of D. Martin (1.0); email correspondence with the Foley team regarding the same (.2); confer with G. Goodman and M. Moore regarding reviewing the report (.1).	1.30	\$877.50
06/26/25	MWBE	Further attention to memo regarding classification and impairment.	1.50	\$900.00
06/26/25	SJM	Attention to scheduling for expert deposition.	0.40	\$350.00
06/26/25	TND	Call with client team and appraisers to provide information on Livermore property (.7); follow-up emails with land use counsel regarding documents (.2); calls with M. Lee regarding same (.2); email to appraiser containing documents exchanged with Livermore regarding property (.1).	1.20	\$960.00
06/27/25	AMN	Review revised memo regarding classification and impairment (.5); make further revisions (.5).	1.00	\$1,050.00
06/27/25	EPK	Review expert report items and documentation (.2); confer with G. Goodman regarding privileged expert report issues (.3).	0.50	\$437.50
06/27/25	MCM	Conference call with expert witness at A&M regarding report assumptions, calculations, and draft report prior to submission of same on June 30 (.8); analysis of issues raised in call and email correspondence regarding same (.5).	1.30	\$1,202.50
06/27/25	MDL	Strategize with C. Moore (A&M) and M. Moore regarding liquidation analysis and cash projections issues.	1.10	\$962.50

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06/27/25	MWBE	Edits to classification memo per A. Nann.	2.30	\$1,380.00
06/28/25	MDL	Email exchange with C. Moore (A&M) regarding Hilco liquidation analysis.	0.20	\$175.00
06/28/25	MDL	Email exchange with A. Zimmerman (Hilco) regarding final Hilco liquidation analysis.	0.10	\$87.50
06/29/25	GSG	Review revised version of C. Moore's expert report (.4); correspondence with S. Levitt regarding same (.2).	0.60	\$630.00
06/29/25	MCM	Revisions of draft expert reports in connection with confirmation testimony.	1.50	\$1,387.50
06/29/25	MDL	Begin reviewing substantive analysis in Hilco expert report.	0.50	\$437.50
06/29/25	MRL	Email correspondence with the Foley and NERA teams regarding the expert report.	0.30	\$202.50
06/29/25	MWBE	Finalize classification memo per A. Nann.	0.40	\$240.00
06/29/25	SJM	Emails with T. Carlucci and M. Kemner regarding deposition errata issue (.3); follow up with K. Martens regarding expert report status (.1).	0.40	\$350.00
06/30/25	EPK	Email correspondence with C. Moore of A&M, D. Flanagan of VeraCruz, and M. Lee regarding privileged plan assets and valuation issues (.2); separate email correspondence with C. Moore and S. Levitt of A&M regarding privileged expert report issues and financial projections for the plan (.3); review restricted cash report prepared by D. Flanagan of VeraCruz (.1); review final executed version of C. Moore's expert report (.2).	0.80	\$700.00
06/30/25	GSG	Review draft of K. Martens' expert report (1.1); review additional issues related to same (.4); telephone conference with S. Moses regarding same (.1).	1.60	\$1,680.00
06/30/25	MCM	Conference call with expert witness regarding final report and related issues (1.0); analysis of expert issues (.5); review draft and provide comments to same prior to submission (.7).	2.20	\$2,035.00
06/30/25	MDL	Email exchange with C. Moore (A&M) regarding liquidation valuation issue.	0.10	\$87.50
06/30/25	MDL	Evaluate draft K. Martens' expert report.	1.10	\$962.50

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06/30/25	MDL	Participate in conference call with D. Martin (NERA) to discuss draft expert report (only participated for part of the call).	0.30	\$262.50
06/30/25	MDL	Email exchange with J. Satter regarding expert report.	0.30	\$262.50
06/30/25	MDL	Email exchange with D. Flanagan regarding real estate splits and vacant land issue.	0.30	\$262.50
06/30/25	MDL	Email exchange with K. Martens regarding expert report.	0.20	\$175.00
06/30/25	MDL	Conference call with J. Satter (Hilco) regarding draft expert report.	0.80	\$700.00
06/30/25	MDL	Evaluate draft Hilco liquidation valuation report.	0.40	\$350.00
06/30/25	MDL	Continue analyzing Hilco draft expert report.	1.60	\$1,400.00
06/30/25	MDL	Email exchange with A. Zimmerman (Hilco) regarding liquidation valuation report.	0.30	\$262.50
06/30/25	MRL	Call with the NERA and Foley teams regarding revising the expert report (.8); confer with M. Moore regarding deadline extension to filing the expert report (.1); email correspondence with the NERA team regarding the same (.6).	1.50	\$1,012.50
06/30/25	MWBE	Finalize classification memo per A. Nann.	0.40	\$240.00
06/30/25	SJM	Review draft expert report from K. Martens (1.3); confer with M. Lee and G. Goodman regarding same (.3); detailed email to K. Martens regarding additional issues to be addressed in report (.5).	2.10	\$1,837.50
Task Total:			222.10	\$206,655.00

008 Communications with Client

06/01/25	MDL	Telephone conference with M. Kemner regarding document production and privilege issues relating to same.	0.70	\$612.50
06/02/25	MDL	Email correspondence with A. Bardos regarding scheduling of site visits to churches by appraisers.	0.40	\$350.00
06/02/25	MDL	Telephone conference with A. Bardos regarding site visits to churches.	0.20	\$175.00

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06/04/25	MDL	Meet with A. Bardos to prepare for his deposition.	3.00	\$2,625.00
06/05/25	MDL	Meet with A. Bardos in advance of deposition.	0.30	\$262.50
06/06/25	MCM	Telephone conference with client parties regarding case issues.	0.40	\$370.00
06/06/25	MDL	Telephone conference with A&M (C. Moore, S. Levitt), D. Flanagan, and L. Oberempt regarding restricted asset analysis.	0.50	\$437.50
06/10/25	AMUE	Communication with R. Harris regarding Friars case (.5); summary email to client leadership regarding privileged issue (.6).	1.10	\$1,155.00
06/10/25	MCM	Email correspondence with client parties regarding claim issues.	0.40	\$370.00
06/10/25	MDL	Meet with A. Bardos and M. Kemner to prepare for Rule 30(b)(6) motion (two separate meetings, one 2.2 hours and one 1.2 hours).	3.40	\$2,975.00
06/10/25	MDL	Email exchange with A. Bardos regarding documents to review in advance of his deposition.	0.40	\$350.00
06/11/25	MCM	Deposition prep with A. Bardos, M. Kemner, and M. Lee (1.6); email correspondence regarding same with attached documentation produced to Committee (.5).	2.10	\$1,942.50
06/11/25	MDL	Email exchange with M. Kemner and A. Bardos regarding documents to review in advance of Rule 30(b)(6) deposition.	1.20	\$1,050.00
06/11/25	MDL	Meet with A. Bardos to prepare for his deposition.	1.80	\$1,575.00
06/12/25	MDL	Meet with A. Bardos following deposition and prepare for second day of deposition.	1.50	\$1,312.50
06/12/25	MDL	Meet with A. Bardos in advance of and to further prepare for the first day of his deposition.	0.60	\$525.00
06/13/25	MDL	Meet with A. Bardos following deposition to strategize for next phase of the case.	0.60	\$525.00
06/13/25	MDL	Meet with A. Bardos to prepare for second day of deposition.	0.80	\$700.00
06/13/25	SJM	Meet with M. Lee and A. Bardos regarding next steps following deposition.	0.60	\$525.00

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06/21/25	MCM	Email correspondence with client parties regarding case strategy.	0.50	\$462.50
06/23/25	MCM	Analyze email correspondence with client parties regarding various issues (.5); respond to same with analysis (.3).	0.80	\$740.00
06/25/25	MDL	Telephone conference with A. Bardos, J. Pluth, P. Bongiovanni, and D. Flanagan regarding cash flow issues and upcoming sale motions.	0.30	\$262.50
06/29/25	MDL	Telephone conference with M. Kemner regarding discovery, expert report, and budget questions.	0.40	\$350.00
Task Total:			22.00	\$19,652.50

009 Corporate Governance and Board Issues

06/04/25	LFG	Communications with L. Mikeworth and R. Medeiros on Stonebridge audit process.	0.70	\$840.00
06/04/25	LPM	Review materials related to Stonebridge audit.	0.30	\$244.50
06/05/25	LPM	Prepare for(.5) and attend call with Stonebridge to discuss audit process (1.4).	1.90	\$1,548.50
06/06/25	LFG	Work with L. Mikeworth on audit procedures and MDRB bylaw creation.	0.60	\$720.00
06/06/25	LPM	Review audit instrument.	0.40	\$326.00
06/09/25	LPM	Review audit instrument.	0.20	\$163.00
06/13/25	LFG	Work with L. Mikeworth on audit analysis and advise clients on same (1.0); call with client (.3); update documents (.4).	1.70	\$2,040.00
06/13/25	LPM	Prepare for (1.1) and attend conference call with R. Medeiros to discuss audit (.3).	1.40	\$1,141.00
06/25/25	LFG	Finalize MDRB Policy, By-Laws and audit instrument.	1.10	\$1,320.00
Task Total:			8.30	\$8,343.00

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011 Cash Management

06/12/25	AMUE	Communication with D. Flanagan regarding cash forecast (.3); review document related to same (.4).	0.70	\$735.00
06/12/25	MCM	Analysis of issues in connection with updated cash forecast.	0.40	\$370.00
06/17/25	AMUE	Analyze cash forecast issue.	0.80	\$840.00
06/18/25	AMUE	Email communication with B. Weisenberg regarding professional fees (.2) and analyze cash forecast (.9).	1.10	\$1,155.00
06/23/25	AMUE	Communication with A. Bardos regarding professional fees (.3); review professional fees run rate to determine impact on cash forecast (.8).	1.10	\$1,155.00
06/23/25	MDL	Telephone conference with D. Flanagan regarding cash flow forecast inputs for professional fees through and after confirmation.	0.60	\$525.00
06/25/25	JJK	Review email regarding report.	0.10	\$97.50
Task Total:			4.80	\$4,877.50

016 General Case Strategy (includes team calls)

06/01/25	MCM	Conference call with Foley team and client parties regarding case strategy and confirmation issues (.6); draft email summary to client and circulate to team for comment (.5).	1.10	\$1,017.50
06/02/25	MDL	Strategize with A. Uetz and S. Moses regarding result of hearing on interim compensation order amendment and discussions with Committee counsel regarding and following same.	0.60	\$525.00
06/02/25	MRM	Analysis of funding for New Orleans settlement.	1.00	\$675.00
06/03/25	MCM	Conference call with Foley team regarding case strategy and related issues.	0.60	\$555.00
06/03/25	MRL	Email correspondence with J. Harrison regarding the weekly update email to the client.	0.20	\$135.00
06/03/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$540.00

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06/04/25	MDL	Meet with S. Moses and M. Thomas regarding results of hearing on motions to dismiss and privilege issues related to 30(b)(6) designation of Committee counsel and next steps following hearing.	0.50	\$437.50
06/04/25	MDL	Strategize with Foley team regarding hearing on motions to dismiss and privilege issues related to 30(b)(6) designation of Committee counsel.	1.00	\$875.00
06/04/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	1.10	\$742.50
06/04/25	SJM	Strategize with M. Lee and M. Thomas regarding approach to Committee 30(b)(6) deposition issue.	0.30	\$262.50
06/05/25	GSG	Comment on expert report issues and deadlines (.2); correspondence with S. Moses regarding K. Martens issues (.2).	0.40	\$420.00
06/06/25	MDL	Analyze upcoming deadlines and necessary motions.	0.90	\$787.50
06/06/25	MDL	Strategize with Foley team regarding restricted asset analysis.	0.30	\$262.50
06/06/25	SJM	Email correspondence with B. Werner and A. Uetz regarding transcript of 30(b)(6) argument.	0.20	\$175.00
06/07/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.70	\$472.50
06/09/25	AMUE	Meeting with M. Lee regarding confirmation strategy.	1.40	\$1,470.00
06/09/25	MDL	Strategize with A. Uetz regarding expert discovery issues and potential asset sale motions.	1.30	\$1,137.50
06/09/25	SJM	Call with A. Uetz and M. Lee regarding results of negotiations with Committee regarding interim fees and results of hearing on Committee deposition.	0.20	\$175.00
06/10/25	GSG	Correspondence with team regarding options for restricted assets analysis.	0.40	\$420.00
06/10/25	MCM	Analysis of Foley internal emails regarding case strategy and related issues (.5); response to same with additional thoughts (.3).	0.80	\$740.00
06/10/25	SJM	Respond to A. Uetz regarding question related to Milwaukee diocese case.	0.40	\$350.00

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06/11/25	GSG	Correspondence with M. Moore regarding C. Moore expert issues.	0.20	\$210.00
06/11/25	MRL	Review email correspondence from the Foley team regarding the weekly update email.	0.20	\$135.00
06/13/25	MCM	Email correspondence with team regarding case issues.	0.50	\$462.50
06/13/25	SJM	Confer with case team regarding result of hearing (.3); call with M. Berg regarding research on confirmation issue (.2); email to M. Berg regarding same (.2).	0.70	\$612.50
06/16/25	GSG	Respond to correspondence regarding restricted assets expert issues.	0.20	\$210.00
06/16/25	MCM	Conference call with E. Khatchatourian and G. Goodman regarding case issues.	0.50	\$462.50
06/18/25	SJM	Call with M. Lee and A. Nann regarding potential sale motion (.9); call with M. Lee regarding discovery issues (.7).	1.60	\$1,400.00
06/21/25	MDL	Strategize with A. Uetz regarding short-term objectives and tasks.	0.20	\$175.00
06/23/25	EPK	Review email correspondence from A. Uetz relating to status of various work streams and tasks for the next two weeks.	0.10	\$87.50
06/23/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	\$540.00
06/23/25	MRL	Review email correspondence from A. Uetz regarding outstanding tasks in the case.	0.20	\$135.00
06/27/25	GSG	Review draft of C. Moore expert report (1.2); communicate with A&M regarding same (.6); telephone conferences with M. Lee and S. Moses regarding expert report issues (.5).	2.30	\$2,415.00
06/27/25	SJM	Call with M. Lee, M. Moore, and M. Rofaeil regarding Committee's renewed lift stay motion and expert report issues.	0.80	\$700.00
Task Total:			22.50	\$19,720.00

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017 Hearings and Court Matters

06/02/25	AMUE	Prepare for (1.5) and appearance at (1.5) court hearing regarding status update and motion to amend interim compensation procedures motion; debrief for client regarding hearing (.5).	3.50	\$3,675.00
06/02/25	SJM	Prepare for hearing on motion to amend compensation procedures (.4); attend hearing (1.6); call with A. Uetz and M. Lee regarding results of hearing (.4).	2.40	\$2,100.00
06/03/25	GSG	Prepare for hearing on motions to dismiss.	2.30	\$2,415.00
06/03/25	SJM	Assist with preparation for hearing on adversary proceeding motions to dismiss.	1.80	\$1,575.00
06/04/25	GSG	Prepare for hearing on motions to dismiss (2.4); telephone conference with Norton Rose regarding same (.4); participate in same (2.5); meet with team and Norton Rose after same (.3).	5.60	\$5,880.00
06/04/25	JMT	Prepare for hearing on discovery issues (2.1); argue hearing on discovery issues and participate in hearing on adversary proceeding (3.2).	5.30	\$4,637.50
06/04/25	MCM	Attend hearing on BRG data breach and related issues (.5); attend hearing on discovery issues and motions to dismiss in adversary proceedings (partial) (1.5).	2.00	\$1,850.00
06/04/25	SJM	Meet with R. Manns, J. Lieto, J. Blanchard, and G. Goodman regarding approach to hearing on motions to dismiss (.4); assist with preparation for hearing (1.6).	2.00	\$1,750.00
06/04/25	SJM	Attend hearing on motions to dismiss adversary proceedings.	3.00	\$2,625.00
06/05/25	MCM	Post-hearing issues regarding Committee discovery and depositions.	0.40	\$370.00
06/06/25	BMWE	Prepare transcript of part of June 4 hearing for team review.	2.30	\$667.00
06/06/25	MCM	Revise post-hearing submission regarding deposition and attorney-client privilege issues vis-a-vis Committee 30(b)(6).	0.30	\$277.50
06/13/25	JMT	Review notes to prepare for hearing on 30(b)(6) (1.0); attend hearing on 30(b)(6) ruling (.6).	1.60	\$1,400.00

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06/13/25	SJM	Attend hearing on discovery issue and motions to dismiss adversary proceedings.	0.60	\$525.00
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Task Total:	33.10	\$29,747.00
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018 Non-Bankruptcy Litigation

06/02/25	EPK	Follow up with S. Moses regarding issues raised in last week's case management conference in JCCP 5108.	0.10	\$87.50
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06/07/25	TFCA	Email correspondence with M. Kemner regarding privileged issue.	0.40	\$550.00
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06/11/25	EPK	Review JCCP 5108 notice regarding rescheduling of the next case management conference (.1); review transcript of prior case management conference (.1).	0.20	\$175.00
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06/13/25	AROU	Attention to client documents collected during discovery in JCCP 5108.	0.20	\$175.00
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06/13/25	EPK	Continue reviewing transcript of the May 28, 2025 JCCP 5108 case management conference (.2); email correspondence with D. Zamora and P. Gaspari of Weintraub Tobin regarding same (.1).	0.30	\$262.50
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06/25/25	AROU	Attention to motion for relief from bankruptcy stay and response.	1.10	\$962.50
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06/25/25	TFCA	Search for testimony (.5); emails with S. Moses regarding same (.2); review update and respond regarding same (.3).	1.00	\$1,375.00
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Task Total:	3.30	\$3,587.50
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020 Retention/Billing/Fee Applications for Debtor Professionals

06/02/25	JCH	Continue work on draft of Foley sixth interim fee application.	2.50	\$825.00
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06/02/25	MCM	Attention to retention issues for Denise Martin as expert witness for confirmation.	0.60	\$555.00
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06/02/25	TND	Calls and emails with I. Velikova regarding Martin retention application (.8); revisions to application, declaration, and other documents based on information from I. Velikova (1.1); discuss matter with M. Moore (.3).	2.20	\$1,760.00
06/03/25	SJM	Email correspondence regarding agreed resolution of motion to amend interim compensation procedures.	0.40	\$350.00
06/03/25	TND	Further work on Martin retention matters.	0.20	\$160.00
06/04/25	AMUE	Analyze issue regarding stipulated order.	0.50	\$525.00
06/04/25	JCH	Finalize draft of Foley sixth interim fee application.	0.50	\$165.00
06/04/25	SJM	Review application to employ NERA and supporting declarations.	0.70	\$612.50
06/04/25	TND	Email to S. Moses and J. Harrison on sixth interim fee application (.1); further preparation of Martin/NERA retention documents (.2).	0.30	\$240.00
06/05/25	TND	Begin gathering information needed for Foley interim fee application.	0.40	\$320.00
06/09/25	TND	Draft task code description sections for the sixth interim fee application for Foley.	4.60	\$3,680.00
06/10/25	SJM	Call with T. Dolcourt regarding Foley interim fee application (.4); begin work on case background section of application (.9).	1.30	\$1,137.50
06/10/25	TND	Further drafting of Foley sixth interim fee application (3.1); review of A&M sixth interim fee application (.3).	3.40	\$2,720.00
06/11/25	AMUE	Finalize interim compensation order revisions.	0.50	\$525.00
06/11/25	EPM	Draft summary of work related to insurance task code for fee application covering Jan. 1, 2025 through April 30, 2025.	3.10	\$2,604.00
06/11/25	SJM	Work on Foley interim fee application.	5.40	\$4,725.00
06/11/25	TND	Further drafting of Foley sixth interim fee application.	0.40	\$320.00
06/12/25	JCH	Prepare (.6) and file (.2) certificates of no objection to Foley's and A&M's May 2025 fee statement.	0.80	\$264.00

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06/12/25	MCM	Email correspondence with T. Dolcourt regarding time entries in Foley bills.	0.30	\$277.50
06/12/25	TND	Further drafting of Foley sixth interim fee application.	2.20	\$1,760.00
06/13/25	TND	Email correspondence with Debtor professionals on interim fee application issues (.3); further preparation of sixth interim fee application (.2).	0.50	\$400.00
06/16/25	JCH	Finalize (.9) and file (.6) interim fee applications for Foley, A&M, the mediators and Verita.	1.50	\$495.00
06/16/25	SJM	Revise Foley fee application based on comments from A. Uetz (1.8); prepare declaration of A. Uetz in support of same (.5); attention to finalizing Foley fee application (.4).	2.70	\$2,362.50
06/16/25	TND	Email correspondence with S. Moses on interim fee applications.	0.20	\$160.00
06/20/25	TND	Prepare May Foley fee statement to ensure compliance with U.S. Trustee guidelines.	3.90	\$3,120.00
06/25/25	SJM	Prepare proposed agreed order to modify interim compensation procedures (1.3); email correspondence with B. Weisenberg regarding same (.3); finalize proposed order based on edits from Committee (.4).	2.00	\$1,750.00
06/25/25	TND	Further preparation of May fee statement to ensure compliance with U.S. Trustee guidelines.	0.90	\$720.00
06/26/25	TND	Further preparation of May 2025 fee statement to conform to U.S. Trustee guidelines.	1.80	\$1,440.00
06/27/25	TND	Emails with A. Uetz and M. Lee regarding May fee statement.	0.20	\$160.00
06/30/25	JCH	Prepare (.6) and file (.2) Foley May 2025 monthly fee statement.	0.80	\$264.00
06/30/25	MDL	Evaluate Foley & Lardner's May fee statement and supporting materials.	0.30	\$262.50

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06/30/25	TND	Discussion with M. Lee regarding scope of Hilco retention (.1); finalize May 2025 Foley fee statement to ensure compliance with U.S. Trustee guidelines (1.6).	1.70	\$1,360.00
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Task Total:	46.80	\$36,019.50
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021 Retention/Fee Applications: Ordinary Course Professionals

06/07/25	TND	Revise M. Kemner May 2025 invoice.	0.20	\$160.00
06/08/25	TND	Email correspondence regarding M. Kemner's May 2025 invoice to Committee counsel and U.S. Trustee.	0.20	\$160.00

Task Total:	0.40	\$320.00
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022 Retention/Fee Applications: Other Professionals

06/05/25	TND	Email correspondence with C. Szymanski regarding fee applications.	0.10	\$80.00
06/08/25	TND	Review draft interim fee application for Mediator Newsome to ensure filing readiness.	0.20	\$160.00
06/09/25	SJM	Email to client regarding filed April monthly fee statements.	0.60	\$525.00
06/10/25	TND	Revise Newsome interim fee application to include information (.6); communications with Judge Newsome regarding application (.3); finalize Newsome and Gallagher drafts for filing (.2).	1.10	\$880.00
06/11/25	SJM	Email correspondence to A. Estrada and T. Dolcourt regarding Verita fee application.	0.30	\$262.50
06/11/25	TND	Review interim fee application for Judge Sontchi.	0.20	\$160.00
06/13/25	JCH	Email correspondence with S. Moses and T. Dolcourt regarding mediator fee applications to be filed on Monday.	0.50	\$165.00
06/16/25	JCH	Review (.4) and file (.1) notice of hearing on interim fee applications; calendar response deadline and hearing on interim fee applications (.2).	0.70	\$231.00

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06/16/25	SJM	Prepare omnibus notice of hearing on interim fee applications (1.2); coordinate with Committee counsel regarding same (.3); direct Verita regarding: service of fee applications (.3).	1.80	\$1,575.00
06/18/25	JCH	Update professionals' fee tracker spreadsheet with current amounts listed in interim fee applications.	1.20	\$396.00
06/25/25	SJM	Email to client regarding direction to pay April monthly fee statements.	0.40	\$350.00
Task Total:			7.10	\$4,784.50

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

06/02/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding compilation of the next Rule 2015.3 report for Furrer Properties due to be filed on June 9, 2025.	0.20	\$175.00
06/03/25	EPK	Email correspondence with D. Flanagan of VeraCruz and J. Pluth regarding data for the next Furrer Properties Rule 2015.3 report due on June 9.	0.30	\$262.50
06/06/25	EPK	Follow up with D. Flanagan of VeraCruz regarding preparation of the next Furrer Properties Rule 2015.3 Report.	0.20	\$175.00
06/08/25	EPK	Review proposed filing version of the next Furrer Properties Rule 2015.3 report (.1); email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding final authorization for filing same on June 9 (.1).	0.20	\$175.00
06/09/25	EPK	Email correspondence with Foley bankruptcy team regarding today's filing of the Furrer Properties Rule 2015.3 Report (.2); email correspondence with A. Bardos of RCBO regarding final approval and execution of same for filing (.2).	0.40	\$350.00
06/16/25	EPK	Email correspondence with D. Flanagan of VeraCruz regarding preparation of the May 2025 monthly operating report.	0.20	\$175.00
06/17/25	EPK	Review preliminary draft of the May 2025 MOR package.	0.20	\$175.00

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06/18/25	EPK	Further review of the May 2025 MOR package and supporting documents (.4); email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding comments to May 2025 MOR package and final approval of MOR for filing on Friday, June 20 (.2).	0.60	\$525.00
06/20/25	EPK	Confirm filing of May 2025 MOR (.1); email correspondence with M. Moore regarding disbursements reflected in same (.1).	0.20	\$175.00
06/20/25	JCH	File monthly operating report for May 2025 and circulate filed copy of same to client group.	0.50	\$165.00
06/25/25	EPK	Email correspondence with D. Flanagan, S. Moses, and Foley litigation support team regarding supplemental MOR productions.	0.20	\$175.00
Task Total:			3.20	\$2,527.50

026 Unsecured Creditor Issues/Communications/Meetings

06/02/25	MCM	Email correspondence with opposing parties regarding Voting Amount Spreadsheet reflecting balloting information and production of same pursuant to Committee request (.3); email correspondence with Verita regarding same (.2).	0.50	\$462.50
06/02/25	MDL	Email exchange with C. Restel and M. Kaplan (both of Lowenstein) regarding property inspections by expert witnesses.	0.20	\$175.00
06/03/25	AMUE	Communications with B. Weisenberg regarding interim compensation order.	0.40	\$420.00
06/03/25	MDL	Email exchange with C. Restel (Lowenstein) regarding property visits by appraisers.	0.10	\$87.50
06/05/25	MCM	Analysis of email correspondence and claim issues raised by Committee counsel (.6); email correspondence with claims and noticing agent to reopen Committee access to non-abuse claims (.3); follow up with Committee counsel (.3).	1.20	\$1,110.00
06/09/25	MCM	Analyze email correspondence with C. Restel for Committee regarding specific claims in Class 3 (.6); email correspondence with Foley team regarding same (.2).	0.80	\$740.00

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06/10/25	MCM	Additional analysis of issues raised by the Committee with respect to specific claims that they intend to ask A. Bardos in his deposition.	0.50	\$462.50
06/16/25	MCM	Email correspondence with C. Restel regarding voting tabulation questions.	0.30	\$277.50
06/18/25	MCM	Email correspondence with C. Restel regarding voting tabulation discussion and open issues.	0.30	\$277.50
06/19/25	MCM	Email correspondence with counsel for Committee regarding meeting with court personnel to discuss confirmation logistics and related issues.	0.40	\$370.00
06/21/25	MCM	Conference call with C. Restel for Committee regarding voting tabulation issues (.4); review follow-up email correspondence regarding same (.3).	0.70	\$647.50
06/26/25	MCM	Analyze renewed motion for relief from stay filed by Committee.	0.60	\$555.00
06/27/25	MCM	Prepare for and participate in conference call regarding renewed Committee motion for relief from stay.	0.50	\$462.50
06/30/25	MDL	Telephone conference with Lowenstein team regarding plan terms and insurance assignment.	1.20	\$1,050.00
Task Total:			7.70	\$7,097.50

028 Tort Claims

06/03/25	KAFA	Compile Glaessner/non-Clergy III/pre-bankruptcy settlement agreements for S. Moses.	0.40	\$180.00
Task Total:			0.40	\$180.00

030 Insurance Issues (other than coverage)

06/06/25	MCM	Email correspondence with insurance counsel regarding voting and other issues.	0.30	\$277.50
Task Total:			0.30	\$277.50

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031 Insurance Issues (coverage, includes adversary proceeding)

06/01/25	ERR	Review status of settlement negotiations with insurers and draft report to clients regarding same.	1.00	\$1,100.00
06/02/25	ERR	Create report to client regarding status of insurance settlement negotiations.	0.50	\$550.00
06/02/25	ERR	Review proposed declaration and supporting papers suggested by the insurers regarding resolution of claims.	0.60	\$660.00
06/02/25	ERR	Review status of production to insurers.	0.50	\$550.00
06/02/25	ERR	Telephone call with T. Gallagher (mediator) regarding potential settlement with insurers and coordination with plan.	0.90	\$990.00
06/02/25	ERR	Review materials from insurers regarding potential support of settlement.	0.50	\$550.00
06/02/25	MDL	Telephone conference with T. Gallagher and Foley team regarding confidential mediation subject (partial).	0.50	\$437.50
06/02/25	MDL	Strategize with Foley team regarding insurance mediation developments.	0.20	\$175.00
06/03/25	EPM	Analysis of insurers and associated pending claims.	0.40	\$336.00
06/03/25	ERR	Review results of Bishop Barber's deposition in light of insurance issues.	0.60	\$660.00
06/03/25	MR	Communicate with counsel for Pacific entities regarding document productions in insurance coverage action.	0.10	\$79.50
06/04/25	EPM	Continued analysis of insurance policies and associated claims.	0.50	\$420.00
06/04/25	ERR	Telephone call with T. Gallagher regarding status of settlement discussions with insurers.	0.50	\$550.00
06/09/25	AMUE	Review status of insurance discussions to provide advice to client.	0.50	\$525.00
06/10/25	AMUE	Analyze insurance settlement issue.	0.40	\$420.00
06/10/25	ERR	Review status of settlement discussions generally and with T. Gallagher.	0.80	\$880.00

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06/12/25	EPM	Strategize with M. Roberts regarding upcoming document productions to insurers (.3); review document produced as part of Production No. 55 (.3); conference call with M. Thomas, M. Roberts, S. Moses, and K. Farrar regarding same (.5); email discussions regarding same (.3).	1.40	\$1,176.00
06/12/25	MR	Attend strategy call with M. Thomas, E. Mazzocco, S. Moses and K. Farrar regarding privileged matters relating to document productions.	0.50	\$397.50
06/13/25	ERR	Review status of settlement discovery.	0.50	\$550.00
06/13/25	MR	Analyze correspondence from insurer defendants in insurance coverage action regarding additional details on discovery disputes, including review of prior written discovery requests and document productions.	1.60	\$1,272.00
06/17/25	EPM	Conference call with M. Roberts regarding correspondence from insurers and analysis of insurer document productions.	0.60	\$504.00
06/17/25	MCM	Analysis of issues in connection with Nicolaidis confidentiality agreement and sharing of documents.	0.30	\$277.50
06/17/25	MR	Attend strategy call with E. Mazzocco regarding privileged matters relating to document discovery in insurance coverage action.	0.50	\$397.50
06/20/25	MR	Perform privileged analysis in connection with document production matters in insurance coverage action.	0.80	\$636.00
06/23/25	MR	Complete privileged analysis in connection with document production matters in insurance coverage action, and draft summary in relation to same.	3.50	\$2,782.50
06/24/25	ERR	Review issues regarding patient privilege.	0.60	\$660.00
Task Total:			18.80	\$17,536.00

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032 Rule 2004 Motions/Discovery/Subpoenas

06/01/25	AMUE	Prepare for depositions of Bishop Barber (3.1) and A. Bardos (1.5); provide advice regarding privileged matter concerning document production (1.2).	5.80	\$6,090.00
06/01/25	JMT	Conduct review to prepare production (3.2); confer with A. Uetz regarding production, discovery efforts to date, and hearing (.4); draft response to correspondence from Committee on status of production (1.1); prepare production for service (2.2); draft talking points on discovery for presentation to court (.8).	7.70	\$6,737.50
06/01/25	MCM	Email and telephone communications with M. Thomas regarding final production of client documents and related issues (.5); quality control review for privilege and responsiveness prior to production (1.2); prepare for deposition of Bishop Barber with T. Carlucci through analysis of client documents (1.5).	3.20	\$2,960.00
06/01/25	MDL	Strategize with Foley team regarding document production.	0.20	\$175.00
06/01/25	MRL	Continue analyzing documents for second review to make production to the Committee.	1.20	\$810.00
06/02/25	AMUE	Meeting with Bishop Barber and Foley team to prepare for deposition (2.5) (partial); follow on meeting with M. Lee regarding discovery issues (.7); three calls with M. Kaplan regarding depositions (1.0); review issues concerning production of documents to Committee (1.5); review possible issues regarding documents inadvertently produced to Committee (1.1); provide detailed update to Foley team regarding 12 different points of discovery from today (.8).	7.60	\$7,980.00
06/02/25	ASK	Email with L. Acuña regarding discovery matters.	0.10	\$65.00
06/02/25	EPM	Emails related to recent document productions (.7); conference call with K. Farrar regarding same (.7); conference call with M. Thomas regarding same (.3).	1.70	\$1,428.00

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06/02/25	JMT	Respond to various discovery issues raised by the Committee (2.1); work on privilege log and confer with team regarding same (1.2); review documents D. Flanagan identified post-deposition and confer regarding same with S. Moses (1.4).	4.70	\$4,112.50
06/02/25	KAFA	Analysis of emails regarding document productions to Committee (.3); call with E. Mazzocco regarding recent RCBO document productions (.8); update document production log (.2).	1.30	\$585.00
06/02/25	MCM	Analysis of work production and related privileges with respect to information produced to Committee and to be produced to insurers (.8); telephone conference with M. Thomas regarding same (.5).	1.30	\$1,202.50
06/02/25	MCM	Preparation with T. Carlucci and client parties for deposition of Bishop Barber scheduled for June 3 at Foley's offices in San Francisco.	8.00	\$7,400.00
06/02/25	MDL	Evaluate documents regarding BRG suggestions on real estate sales.	0.20	\$175.00
06/02/25	MDL	Strategize with A. Uetz regarding discovery and deposition issues.	0.70	\$612.50
06/02/25	MDL	Draft summary of document production history for hearing on interim compensation order amendment.	0.50	\$437.50
06/02/25	MRL	Email correspondence with the Foley team regarding the privilege log (.2); confer with M. Thomas and M. Mitcham regarding drafting the privilege log (.4).	0.60	\$405.00
06/02/25	MRM	Draft narratives for privilege log.	2.90	\$1,957.50
06/02/25	SJM	Work on addressing Committee request for additional documents following D. Flanagan deposition.	0.90	\$787.50
06/02/25	SJM	Call with M. Thomas regarding document production and related issues (1.0); review documents regarding potential privilege (1.2); email to case team regarding same (.2).	2.40	\$2,100.00

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06/03/25	AMUE	Analyze privileged issue concerning document production (1.1) and provide advice regarding same (.5); follow-up communications with Foley team to provide direction regarding privileged discovery issue (1.1).	2.70	\$2,835.00
06/03/25	JCH	Prepare copies of all objections to the disclosure statement filed by the Committee for M. Thomas.	0.50	\$165.00
06/03/25	JMT	Confer with team regarding discovery issues and issues concerning designation of counsel as a 30(b)(6) witness (1.1); research cases involving counsel designated as a 30(b)(6) witness (1.2); confer with opposing counsel regarding same (.6); confer with team on discovery issues raised during Bishop Barber's deposition (.6); prepare for hearing on discovery issues (2.8); review correspondence to begin addressing various discovery issues raised by the Committee (.8); assist team with preparing privilege log (1.2).	8.30	\$7,262.50
06/03/25	MCM	Review email correspondence and prior productions in connection with discovery of certain agreements.	0.50	\$462.50
06/03/25	MDL	Telephone conference with Foley team regarding privileged documents (partial).	0.90	\$787.50
06/03/25	MR	Perform comparison and analysis of certain previously-produced documents in connection with ongoing deposition.	1.30	\$1,033.50
06/03/25	MRL	Confer with M. Mitcham regarding drafting the privilege log for the document production (.3); analyze documents in preparation for the privilege log (.2); confer with M. Thomas regarding research on client attorney privilege (.3); research case law regarding waiving privilege and 30(b)(6) witnesses (3.7).	4.50	\$3,037.50
06/03/25	MRM	Research in connection with outside counsel testifying as corporate representative and subject matter waiver of privilege (1.4); draft narratives to privilege log (5.5).	6.90	\$4,657.50
06/03/25	SJM	Analyze Committee counsel request for R. Simons to attend deposition in person.	0.20	\$175.00

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06/03/25	SJM	Identify documents for production in response to Committee 6/1 letter (.8); call with D. Flanagan regarding same (.9).	1.70	\$1,487.50
06/03/25	SJM	Email to case team regarding privilege issues as to certain documents (.3); meeting with A. Uetz, M. Lee, M. Thomas, and M. Moore regarding same (1.1).	1.40	\$1,225.00
06/03/25	SJM	Assist with preparation for L. Oberempt and B. Barber depositions (.7); identify settlement agreements for production (.6).	1.30	\$1,137.50
06/04/25	ASK	Email with L. Acuña regarding discovery matters.	0.10	\$65.00
06/04/25	JCH	Calendar updated dates and times for depositions.	0.50	\$165.00
06/04/25	JMT	Confer with team regarding discovery issues (.5); review protective order and advise team on deposition designations of highly confidential material (.3); confer with opposing counsel regarding same (.2).	1.00	\$875.00
06/04/25	KAFA	Communications with M. Schachte regarding prior NRF/RCC productions (.1); review emails, RelOne and Q drive for prior NRF/RCC productions (.2).	0.30	\$135.00
06/04/25	MRL	Confer with M. Thomas regarding the research on 30(b)(6) witnesses (.3); further research on case law regarding 30(b)(6) witnesses for trial attorneys (.6); draft an email to M. Thomas regarding research results (.3); confer with M. Moore and M. Mitcham regarding the status of document review process (.4); confer with M. Thomas regarding the outcome of the hearing and drafting a letter to the court (.2); draft a letter to the court regarding the Committee's certain position on depositions (1.5); analyze documents in preparation for the privilege log (2.4).	5.70	\$3,847.50
06/04/25	MRM	Draft narratives to privilege log.	3.30	\$2,227.50
06/04/25	TND	Email with K. Ameid regarding priest discovery follow up.	0.10	\$80.00
06/05/25	JCH	Download D. Flanagan deposition transcript and exhibits for A. Uetz and S. Moses.	0.50	\$165.00

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06/05/25	MCM	Attention to document-production issues with Committee (.5); email correspondence with Committee counsel regarding setting of Moore deposition on July 24, 2025 in Detroit at Foley offices (.3); confer with C. Moore at A&M regarding same (.3).	1.10	\$1,017.50
06/05/25	MDL	Meet with M. Kaplan and C. Restel (Lowenstein) regarding revisions to pre-confirmation schedule.	0.40	\$350.00
06/05/25	MDL	Email correspondence with C. Restel and M. Kaplan (both of Lowenstein) regarding confirmation of agreement on revisions to pre-confirmation schedule.	0.40	\$350.00
06/05/25	MRL	Confer with M. Thomas regarding drafting the letter to the court regarding the Committee's certain position on depositions (.3); continue drafting the brief to the court regarding the Committee's certain position on depositions (1.6); analyze documents in preparation for the privilege log (5.3).	7.20	\$4,860.00
06/05/25	MRM	Draft narratives to privilege log entries.	6.50	\$4,387.50
06/05/25	SJM	Attention to revised agreed schedule for discovery deadlines.	0.40	\$350.00
06/05/25	SJM	Email correspondence with A. Uetz and M. Moore regarding transcript from 30(b)(6) discussion on 6/4 (.3); review upcoming discovery timeline (.3); email to case team regarding rebuttal expert disclosure deadline (.2); evaluate expert topics and rebuttal testimony needed (.4).	1.20	\$1,050.00
06/06/25	JMT	Confer with team regarding document production (.4); meet with team to discuss outstanding discovery issues (.7); work on document redactions (.6); coordinate with review team regarding outstanding document review (1.1); edit privilege log (2.4).	5.20	\$4,550.00
06/06/25	MCM	Follow up on production of Voting Amount Spreadsheet to Committee based on informal requests for same (.3); quality-control and privilege check regarding last anticipated document production (.8); meeting with Foley team regarding productions and discovery issues (.4).	1.50	\$1,387.50

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06/06/25	MDL	Evaluate additional documents to be produced to Committee.	0.10	\$87.50
06/06/25	MRL	Continue analyzing documents in preparation for the privilege log (2.6); confer with M. Moore and M. Thomas regarding the brief to the court regarding the depositions (.5); continue drafting the brief to the court regarding the Committee's certain position on depositions (3.0); confer with M. Thomas regarding redacting documents in preparation for document production (.2); redact certain documents of confidential information in order to produce the documents to the Committee (1.8).	8.10	\$5,467.50
06/06/25	MRM	Redact documents for privilege (6.2); finalize privilege log narratives (1.5).	7.70	\$5,197.50
06/06/25	SJM	Further work to assist with finalizing document production to Committee.	0.50	\$437.50
06/06/25	SJM	Calls with M. Thomas regarding further document production (.4); emails with document production team regarding identifying and coding documents and other production issues (.5); work on identifying further documents for production (.8); call with M. Lee regarding same (.2); review documents for production (1.5); analyze privilege issues regarding production (.3).	3.70	\$3,237.50
06/07/25	MDL	Email exchange with C. Restel (Lowenstein) regarding stipulated amendment to pre-confirmation scheduling order.	0.10	\$87.50
06/07/25	MDL	Revise proposed stipulated amendment to pre-confirmation scheduling order.	0.10	\$87.50
06/08/25	JMT	Revise statement to the court regarding 30(b)(6) deposition.	2.30	\$2,012.50
06/08/25	MRL	Revise brief to the court regarding the Committee's certain position on deposition to conform to M. Moore's comments.	1.90	\$1,282.50
06/09/25	AMUE	Analyze issue concerning 30(b)(6) deposition of Committee.	1.10	\$1,155.00
06/09/25	AMUE	Review privileged issue concerning document production.	1.20	\$1,260.00

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06/09/25	AMUE	Finalize court submission regarding 30(b)(6) deposition of the Committee.	0.80	\$840.00
06/09/25	AMUE	Communications with D. Flanagan, and with A. Bardos, regarding privileged discovery matter.	0.50	\$525.00
06/09/25	AMUE	Provide direction to Foley team regarding numerous discovery matters following initial depositions last week.	1.20	\$1,260.00
06/09/25	KAFA	Communications with team regarding preparation of document productions to the Committee (.3); update document production log (.2).	0.50	\$225.00
06/09/25	MRL	Revise the privilege log for certain documents to conform to M. Thomas' comments (2.0); finalize to file the brief to the court regarding the Committee's certain position on depositions (.5); email correspondence with the Foley team regarding the same (.2).	2.70	\$1,822.50
06/09/25	MRM	Review final privilege log.	0.40	\$270.00
06/09/25	SJM	Respond to C. Restel regarding production of certain agreements.	0.30	\$262.50
06/10/25	AMUE	Analyze outstanding document discovery issue.	0.50	\$525.00
06/10/25	JMT	Confer with team regarding production formatting issue and resolve same (.4); confer with team regarding outstanding discovery issues (.7).	1.10	\$962.50
06/10/25	SJM	Respond to A. Uetz and M. Thomas regarding document production issue.	0.30	\$262.50
06/11/25	AMUE	Analyze open discovery issues.	1.40	\$1,470.00
06/11/25	JMT	Review outstanding discovery issues and advise team regarding same (1.4); confer with team regarding re-production of load files for production 56 (.3).	1.70	\$1,487.50
06/11/25	KAFA	Update document production log.	0.20	\$90.00
06/11/25	MCM	Analysis of discovery status update on productions, privilege, and remaining issues.	0.40	\$370.00
06/11/25	MDL	Evaluate open discovery issues identified by Committee.	0.30	\$262.50
06/11/25	MRL	Email correspondence with the Foley team regarding outstanding discovery issues.	0.30	\$202.50

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06/11/25	SJM	Attention to planning for A. Bardos deposition.	0.30	\$262.50
06/12/25	JMT	Confer with insurance team regarding production issues (.7); attention to document discovery and respond to concerns regarding same (.6); confer with team regarding response to discovery inquiries by Committee (.4).	1.70	\$1,487.50
06/12/25	KAFA	Call with Foley team to discuss document productions to the Committee.	0.50	\$225.00
06/12/25	MCM	Analysis of privilege issues with respect to certain documents produced/to be produced to Committee.	0.50	\$462.50
06/12/25	MDL	Defend A. Bardos deposition.	8.00	\$7,000.00
06/12/25	MRL	Email correspondence with S. Moses and M. Mitcham regarding certain documents.	0.40	\$270.00
06/12/25	MRM	Document analysis in connection with questions regarding produced documents (1.8); analysis and discussion in connection with meet and confer response (2.5); draft meet and confer response (.5).	4.80	\$3,240.00
06/13/25	KAFA	Communications with Foley team to discuss document productions to the Committee.	1.40	\$630.00
06/13/25	MDL	Meet with M. Kaplan, C. Restel, and A. Giblin to discuss outstanding discovery issues.	0.50	\$437.50
06/13/25	MRL	Review email correspondence from the Foley team regarding status of discovery requests to the Committee.	0.20	\$135.00
06/13/25	MRM	Draft meet and confer response.	1.80	\$1,215.00
06/16/25	JMT	Review transcript of D. Flanagan for highly confidential designations.	2.30	\$2,012.50
06/16/25	MDL	Analyze Committee demands and new requests for documents.	0.60	\$525.00
06/16/25	MRL	Confer with M. Thomas and M. Moore regarding status of discovery issues in the case.	0.30	\$202.50
06/17/25	AMUE	Direct designation of highly confidential deposition testimony.	0.50	\$525.00

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06/17/25	AMUE	Analyze privileged issue concerning production of documents (.8); meeting with Foley team (led by E. Mazzocco) regarding same (1.0); debrief with M. Lee regarding same (.5).	2.30	\$2,415.00
06/17/25	EGJ	Confer with E. Mazzocco regarding privileged issue.	0.10	\$65.00
06/17/25	EPM	Analysis of privilege status of documents produced in bankruptcy (.9); conference call regarding same with A. Uetz, M. Lee, M. Thomas, and S. Moses (1.0); planning for document review regarding same (.5).	2.40	\$2,016.00
06/17/25	ERAS	Confer with E. Mazzocco regarding document review of internal privileged documents.	0.10	\$55.00
06/17/25	JMT	Review the D. Flanagan deposition transcript and type up the highly confidential designations (1.1); confer with team regarding production concerns (.5).	1.60	\$1,400.00
06/17/25	MDL	Strategize with Foley team regarding second review of privileged materials.	1.00	\$875.00
06/17/25	MRL	Email correspondence with M. Thomas regarding drafting letter to the Committee for designation of depositions (.3); draft a letter to the Committee regarding designation of highly confidential depositions (.9).	1.20	\$810.00
06/17/25	SJM	Work on identified documents related to certain agreements based on Committee demand.	2.40	\$2,100.00
06/17/25	SJM	Call with case team regarding discovery issues (.7); call with M. Thomas regarding follow up from same (.2); call with E. Mazzocco and A. Uetz regarding review of certain documents (.2); call with M. Thomas regarding Committee follow-up issues (.2).	1.30	\$1,137.50
06/17/25	SJM	Prepare memo regarding privileged issue regarding document production.	1.30	\$1,137.50
06/17/25	SJM	Review draft letter regarding confidentiality designations for D. Flanagan deposition (.2); email to Bishop Barber regarding review of deposition transcript (.3); email to A. Bardos regarding same (.3).	0.80	\$700.00

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06/18/25	EGJ	Confer with E. Mazzocco regarding document production.	0.40	\$260.00
06/18/25	EPM	Planning for document review of potentially privileged documents including analysis of exemplar documents (1.7); call with M. Lee regarding same (.5); call with E. Jones and E. Asfora regarding same (.4); call with M. Schachte regarding same (.5); draft email to case team summarizing plan for document review (.6).	3.70	\$3,108.00
06/18/25	ERAS	Call with E. Mazzocco and E. Jones regarding strategy for document review.	0.50	\$275.00
06/18/25	MDL	Evaluate open discovery issues.	0.70	\$612.50
06/18/25	MDL	Telephone conference with E. Mazzocco regarding review process.	0.50	\$437.50
06/18/25	MRL	Email correspondence with the Foley team regarding letter to the Committee for designation of depositions.	0.30	\$202.50
06/18/25	SJM	Respond to A. Uetz regarding document issues (.3); respond to E. Mazzocco regarding protective order issue (.4); attention to issues regarding privilege in connection with document production (1.4); email to M. Thomas regarding same (.5); finalize letter regarding confidentiality designations for D. Flanagan deposition (.4).	3.00	\$2,625.00
06/19/25	EPM	Make adjustments to setup for document review of potentially privileged documents.	1.30	\$1,092.00
06/19/25	ERAS	Review RCBO's document production regarding privileged issue.	2.60	\$1,430.00
06/19/25	MDL	Telephone conference with D. Martin (expert witness) and M. Moore regarding claims analysis issues.	1.30	\$1,137.50
06/19/25	MDL	Evaluate issue relating to certain privileged communications.	0.20	\$175.00
06/19/25	MDL	Email exchange with D. Flanagan regarding scope of real estate to be appraised.	0.20	\$175.00
06/20/25	EGJ	Analyze documents for production regarding privileged issue.	3.10	\$2,015.00

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06/20/25	EPM	Respond to questions regarding document review of potentially privileged documents.	0.40	\$336.00
06/20/25	ERAS	Review RCBO's document production for privileged documents.	4.70	\$2,585.00
06/20/25	JMT	Designate confidential testimony from Bishop Barber.	2.40	\$2,100.00
06/20/25	KAFA	Prepare client documents for production to the Committee.	0.50	\$225.00
06/20/25	MRL	Email correspondence with M. Thomas regarding drafting letter to the Committee for designation of depositions (.1); draft a letter to the Committee regarding designation of highly confidential depositions (.3).	0.40	\$270.00
06/21/25	EGJ	Analyze documents for privilege.	1.00	\$650.00
06/21/25	ERAS	Review RCBO's document production for privileged documents.	5.40	\$2,970.00
06/21/25	MRL	Analyze deposition transcripts (.2); email correspondence with the Foley team regarding the same (.1).	0.30	\$202.50
06/22/25	EGJ	Code documents from production.	1.00	\$650.00
06/22/25	ERAS	Review RCBO's document production for privileged issue.	2.60	\$1,430.00
06/23/25	EGJ	Code documents from production.	2.40	\$1,560.00
06/23/25	EPM	Supervise document review for attorney-client and work product privilege.	0.60	\$504.00
06/23/25	ERAS	Review RCBO's document production for privileged documents.	5.50	\$3,025.00
06/23/25	MDL	Email exchange with Committee counsel regarding identified discovery open points.	0.60	\$525.00
06/23/25	MRL	Email correspondence with J. Harrison regarding the deposition transcripts.	0.30	\$202.50
06/24/25	EGJ	Confer with E. Mazzocco regarding coding (.4); code documents (2.4).	2.80	\$1,820.00

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06/24/25	EPM	Supervise document review for attorney-client privilege and work product (.5); call with document reviewers E. Jones and E. Asfora regarding status of document review (.4); conference call with M. Lee and E. Ridley regarding privileged legal research topics (.3).	1.20	\$1,008.00
06/24/25	ERAS	Strategize with E. Mazzocco and E. Jones regarding psychotherapist-patient privilege for use in review of privileged documents (.5); review RCBO's document production for privileged documents (3.8).	4.30	\$2,365.00
06/24/25	MDL	Telephone conference with E. Ridley and E. Mazzocco regarding privilege review issue.	0.30	\$262.50
06/24/25	MDL	Email exchange with M. Kaplan regarding UCC 30(b)(6) deposition and logistics of confirmation hearing.	0.20	\$175.00
06/24/25	MRL	Review email correspondence from M. Lee regarding certain discovery requests.	0.20	\$135.00
06/24/25	SJM	Evaluate issue regarding deposition errata (.4); email to T. Carlucci regarding same (.1); email to M. Kemner regarding same (.3).	0.80	\$700.00
06/25/25	EPM	Quality control review of documents marked as attorney-client privileged or work product protected.	1.00	\$840.00
06/25/25	ERAS	Review RCBO's document production for privileged documents.	1.60	\$880.00
06/25/25	KAFA	Communications with D. Flanagan and Foley team regarding production of MOR supplemental information.	0.30	\$135.00
06/26/25	EPM	Quality control review of documents marked attorney-client privileged or work product protected.	3.90	\$3,276.00
06/27/25	EGJ	Confer with E. Mazzocco regarding document production.	0.10	\$65.00
06/27/25	KAFA	Communications with team regarding documents produced to the Committee (.1); update document production log (.2).	0.30	\$135.00
06/27/25	MDL	Strategize regarding open discovery issues identified by Committee.	0.50	\$437.50

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06/27/25	MDL	Evaluate document review results and proposed protocols.	0.20	\$175.00
06/27/25	MDL	Provide instruction to Foley discovery team regarding production of additional VeraCruz documents.	0.20	\$175.00
06/27/25	MDL	Review additional sensitive issue file documents in response to Committee complaints about production.	1.60	\$1,400.00
06/27/25	MDL	Email exchange with Committee counsel regarding VeraCruz documents and post-Clergy III settlement documents.	0.30	\$262.50
06/27/25	MRL	Review email correspondence from the Foley team regarding discovery issues.	0.30	\$202.50
06/27/25	SJM	Call with M. Lee regarding VeraCruz Excel files (.1); review production for privilege (2.4); email correspondence with M. Lee regarding potential privilege issue (.2).	2.70	\$2,362.50
06/27/25	SJM	Attention to issue regarding documents relating to prior settlements (1.3); email to P. Glaessner regarding same (.2).	1.50	\$1,312.50
06/28/25	MDL	Email exchange with M. Kaplan (Lowenstein) regarding document requests and supplemental productions.	0.20	\$175.00
06/28/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding expert reports and supplemental document productions.	0.50	\$437.50
06/29/25	SJM	Review A. Bardos deposition transcript for confidentiality designations.	2.40	\$2,100.00
06/30/25	EGJ	Confer with E. Mazzocco regarding document production.	0.30	\$195.00
06/30/25	EPM	Conference call with E. Jones and E. Asfora regarding review of documents for psychotherapy privilege under California law.	0.30	\$252.00
06/30/25	ERAS	Call with E. Mazzocco and E. Jones regarding strategy for documents protected by psychotherapist-patient privilege.	0.30	\$165.00

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06/30/25	MRL	Email correspondence with the Foley team regarding deposition transcripts.	0.20	\$135.00
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Task Total:	268.70	\$211,003.50
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035 General Counsel Matters

06/16/25	LFG	Work with client on review of policies.	1.60	\$1,920.00
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06/17/25	LFG	Work on audit and policy updates.	1.30	\$1,560.00
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06/18/25	LFG	Edit policies (1.0); communications with Chancellor regarding same (.4).	1.40	\$1,680.00
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Task Total:	4.30	\$5,160.00
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038 Mediation

06/03/25	ERR	Attend mediation session with mediators (Gallagher and Newsome) and insurers.	1.50	\$1,650.00
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06/03/25	MCM	Attend insurance mediation meeting with E. Ridley on behalf of RCBO (partial) (.6); debrief with Foley team following same (.4).	1.00	\$925.00
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Task Total:	2.50	\$2,575.00
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Services Total:	740.40	\$629,638.50
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Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Amani S. Kmeid	ASK	Associate	0.20	\$650.00	\$130.00
Emily G. Jones	EGJ	Associate	11.20	\$650.00	\$7,280.00
Eloise R. Asfora	ERAS	Associate	27.60	\$550.00	\$15,180.00
Joseph S. Harper	JSH	Associate	0.70	\$800.00	\$560.00
Mason Roberts	MR	Associate	8.30	\$795.00	\$6,598.50
Mary Rofaail	MRL	Associate	53.00	\$675.00	\$35,775.00
Mikaela R. Mitcham	MRM	Associate	35.30	\$675.00	\$23,827.50
Michael W. Berg	MWBE	Associate	24.10	\$600.00	\$14,460.00
Alissa M. Nann	AMN	Of Counsel	13.80	\$1,050.00	\$14,490.00
Shane J. Moses	SJM	Of Counsel	129.90	\$875.00	\$113,662.50

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Brittnie M. Werner	BMWE	Paralegal	2.30	\$290.00	\$667.00
Janelle C. Harrison	JCH	Paralegal	23.50	\$330.00	\$7,755.00
Kerry A. Farrar	KAFA	Paralegal	5.70	\$450.00	\$2,565.00
Ann Marie Uetz	AMUE	Partner	61.20	\$1,050.00	\$64,260.00
Emil P. Khatchatourian	EPK	Partner	15.70	\$875.00	\$13,737.50
Eileen R. Ridley	ERR	Partner	9.20	\$1,100.00	\$10,120.00
Geoffrey S. Goodman	GSG	Partner	26.90	\$1,050.00	\$28,245.00
Jason J. Kohout	JJK	Partner	0.80	\$975.00	\$780.00
Jonathan Michael Thomas	JMT	Partner	48.20	\$875.00	\$42,175.00
Lisa F. Glahn	LFG	Partner	8.40	\$1,200.00	\$10,080.00
Mark C. Moore	MCM	Partner	80.20	\$925.00	\$74,185.00
Matthew D. Lee	MDL	Partner	74.90	\$875.00	\$65,537.50
Robert T. Slovak	RTS	Partner	0.10	\$875.00	\$87.50
Thomas F. Carlucci	TFCA	Partner	23.60	\$1,375.00	\$32,450.00
Kaylee Soroka	KASO	Project Assistant	1.00	\$290.00	\$290.00
Alan R. Ouellette	AROU	Senior Counsel	1.30	\$875.00	\$1,137.50
Elizabeth P. Mazzocco	EPM	Senior Counsel	22.50	\$840.00	\$18,900.00
Laura P. Mikeworth	LPM	Senior Counsel	4.20	\$815.00	\$3,423.00
Tamar N. Dolcourt	TND	Special Counsel	26.60	\$800.00	\$21,280.00
Totals			740.40		\$629,638.50

Expenses Incurred

Description	Amount
Depositions / Transcripts, Exams	\$5,733.61
Electronic Legal Research Services	\$405.30
LSS - eDiscovery Services	\$11,300.00
Meals	\$1,479.67
Other Expenses	\$165.44
Shipping Charges	\$33.95
Expenses Incurred Total	\$19,117.97

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

Depositions / Transcripts, Exams

Date	Initials	Description	Amount
06/12/25	JRBL	Jilio-Ryan Hunter & Olsen, Inc - Reporter's Transcript of Proceedings - Case Management Conference & Motions in Limine - 06/12/25.	\$241.95
06/17/25	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Copy of Transcript: Judge Michael Hogan - 06/17/25.	\$807.67
06/17/25	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Transcript of: Bishop Michael C. Barber - 06/17/25.	\$2,731.51
06/17/25	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Transcript of: Lisa Oberempt - 06/17/25.	\$981.10
06/23/25	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Transcript of: Andrew Currier - 06/23/25.	\$971.38
			<hr/> \$5,733.61

Electronic Legal Research Services

Date	Initials	Description	Amount
06/30/25	MWBE	Westlaw. US TREATISES DOC ACCESS. SEARCH ACCESS CHARGE. Docket Report.	\$405.30

LSS - eDiscovery Services

Date	Initials	Description	Amount
06/30/25	JRBL	LSS - eDiscovery Services.	\$11,300.00

Meals

Date	Initials	Description	Amount
06/02/25	ASD	VENDOR: U.S. BANK - 06/03/25 Lunch for depositions of Bishop Barber and L. Oberempt (ordered for estimated 16 attendees).	\$306.01
06/03/25	ASD	VENDOR: U.S. BANK - 06/02/25 Breakfast regarding deposition preparation (3 attendees).	\$24.49
06/03/25	ASD	VENDOR: U.S. BANK - 06/03/25 Additional lunch order for depositions of Bishop Barber and L. Oberempt (ordered for estimated 16 attendees).	\$15.20

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06/03/25	ASD	VENDOR: U.S. BANK - 06/03/25 Additional lunch order for depositions of Bishop Barber and L. Oberempt (ordered for estimated 16 attendees).	\$64.53
06/04/25	ASD	VENDOR: U.S. BANK - 06/05/25 Breakfast for deposition of A. Bardos (OPF and Adventus) and A. Currier (RCWC) (9 attendees).	\$130.64
06/05/25	ASD	VENDOR: U.S. BANK - 06/05/25 Additional breakfast order for deposition of A. Bardos (OPF and Adventus) and A. Currier (RCWC) (9 attendees).	\$53.72
06/10/25	ASD	VENDOR: U.S. BANK - 06/12/25 Lunch for deposition of Debtor's 30(b)(6) designee (ordered for estimated 15 attendees).	\$369.33
06/10/25	ASD	VENDOR: U.S. BANK - 06/13/25 Lunch for deposition of Debtor's 30(b)(6) designee (ordered for estimated 15 attendees).	\$369.33
06/12/25	ASD	VENDOR: U.S. BANK - 06/12/25 Breakfast for deposition of Debtor's 30(b)(6) designee (6 attendees).	\$73.21
06/13/25	ASD	VENDOR: U.S. BANK - 06/13/25 Breakfast for deposition of Debtor's 30(b)(6) designee (6 attendees).	\$73.21
			<hr/> \$1,479.67

Other Expenses

Date	Initials	Description	Amount
06/30/25	JRBL	Epiq Global Business Transformation Solutions LLC - Epiq overtime charges - June 2025 -San Fran - 06/30/25.	\$26.53
06/30/25	JRBL	Epiq Global Business Transformation Solutions LLC - Epiq overtime charges - June 2025 - San Fran - 06/30/25.	\$26.53
06/30/25	JRBL	Epiq Global Business Transformation Solutions LLC - Epiq overtime charges - June 2025 - San Fran - 06/30/25.	\$26.53
06/30/25	JRBL	Epiq Global Business Transformation Solutions LLC - Epiq overtime charges - June 2025 - San Fran - 06/30/25.	\$59.32
06/30/25	JRBL	Epiq Global Business Transformation Solutions LLC - Epiq overtime charges - June 2025 - San Fran - 06/30/25.	\$26.53
			<hr/> \$165.44

Shipping Charges

Date	Initials	Description	Amount
06/30/25	AMUE	Federal Express Invoice: 889796197; Tracking: 289624360177; Sender: Ann Marie Uetz; Recipient: Matt Lee Foley & Lardner LLP 150 E GILMAN ST STE 5000 MADISON WI 53703 US.	\$33.95

Expense Total: \$19,117.97

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

Date: August 31, 2025
Invoice No.: 51134897
Our Ref. No.: 100845-0402

Services through July 31, 2025

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	\$521,418.50
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Total Expenses:	\$17,855.18
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Amount Due:	\$539,273.68
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Foley & Lardner LLP

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

07/14/25	AMN	Attend all-hands call in preparation for hearing (.5); revise 363 motion for release of interest in CCSS and related correspondence with M. Lee (2.0).	2.50	\$2,625.00
07/22/25	AMN	Call with M. Lee and S. Moses regarding 363 motion regarding disposition of board rights in connection with CCSS and status of case generally (.7); review CCSS bylaws and amended bylaws (.5); discuss 363 and 9019 research with M. Berg (.4).	1.60	\$1,680.00
07/22/25	MDL	Call with Foley team regarding CMS divestment motion (.7); prepare for same (.4).	1.10	\$962.50
07/22/25	MWBE	Meet with A. Nann to discuss research needed for pending sale of rights regarding cemetery management.	0.40	\$240.00
07/22/25	SJM	Call with A. Nann and M. Lee regarding motion for approval of CMS transaction (partial).	0.50	\$437.50
07/23/25	AMN	Discuss 363 versus 9019 research issue with M. Berg regarding CCSS motion and review correspondence regarding same.	1.00	\$1,050.00
07/23/25	MWBE	Research sale procedures per A. Nann.	0.90	\$540.00
07/23/25	SJM	Review research in connection with draft motion to approach CMS transaction.	0.60	\$525.00
07/24/25	AMN	Review bylaws and revise 363 motion (1.6); correspondence with M. Berg regarding 363 research on sale of intangibles (.4).	2.00	\$2,100.00
07/24/25	MWBE	Research regarding 363 sale authority.	0.40	\$240.00
07/24/25	SJM	Review additional research from M. Berg on legal authority for potential transaction (.4); email regarding potential follow-up research (.2).	0.60	\$525.00
07/25/25	MWBE	Research 363 case law as requested by S. Moses.	0.50	\$300.00
07/28/25	SJM	Review draft motion to approve CMS transaction.	0.80	\$700.00
07/29/25	MDL	Revise motion to divest CMS position.	1.60	\$1,400.00

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Foley & Lardner LLP

August 31, 2025

07/31/25	MDL	Revise CMS divestment motion.	1.40	\$1,225.00
Task Total:			15.90	\$14,550.00

003 Automatic Stay

07/04/25	MCM	Email correspondence with various parties regarding Committee's renewed motion to lift automatic stay for select test cases.	0.30	\$277.50
07/06/25	MCM	Attention to Debtor's objection to Committee's renewed motion to lift automatic stay for select test cases following earlier denial of identical motion.	0.50	\$462.50
07/07/25	JCH	Prepare draft opposition to Committee's renewed motion to lift stay and brief in support.	0.80	\$264.00
07/07/25	MCM	Revise opposition to Committee's motion to modify automatic stay to allow test cases in RCBO bankruptcy.	0.50	\$462.50
07/07/25	MRL	Confer with M. Moore and N. McGuffey regarding drafting the Debtor's response to the Committee's motion for relief from stay (.3); analyze hearing transcripts for the response to the Committee's motion for relief from stay (.9); confer with N. McGuffey regarding the same and drafting the response (.4).	1.60	\$1,080.00
07/07/25	NMCG	Meeting with M. Moore and M. Rofaail to discuss objection to renewed motion to lift stay (.2); draft the objection to lift stay (2.7).	2.90	\$2,030.00
07/08/25	AROU	Revise T. Carlucci declaration.	0.20	\$175.00
07/08/25	EPK	Email correspondence with A. Uetz and S. Moses regarding declaration in support of opposition to Committee's lift stay motion (.2); confer with S. Moses regarding arguments in opposition to the Committee's renewed lift stay motion (.3); compile and send JCCP 5108 CMC statements and orders to S. Moses for review (.1).	0.60	\$525.00
07/08/25	MCM	Revise opposition to Committee's motion to modify automatic stay to allow test cases in RCBO bankruptcy (.5); revise declarations in connection with same (.3).	0.80	\$740.00

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07/08/25	MRL	Revise the Debtor's response to the Committee's motion to lift the stay.	0.40	\$270.00
07/08/25	SJM	Meet with A. Ouellette regarding status of state court actions prior to bankruptcy (.5); prepare declaration of T. Carlucci in support of opposition to Committee's renewed lift stay motion (1.8); revise opposition to renewed lift stay motion (4.1).	6.40	\$5,600.00
07/08/25	TFCA	Begin review of declaration regarding motion to lift stay.	0.50	\$687.50
07/09/25	AMUE	Revisions to opposition to lift stay motion/declaration in support.	2.10	\$2,205.00
07/09/25	AROU	Revise T. Carlucci declaration.	0.80	\$700.00
07/09/25	MCM	Review opposition to Committee's renewed motion to modify automatic stay and draft declarations in support of same (.4); email correspondence with Foley team regarding finalization of documents (.3).	0.70	\$647.50
07/09/25	SJM	Continue to draft opposition to Committee motion to lift the automatic stay as to test cases (1.8); multiple emails regarding supporting declaration and status of state court cases (.7); revise supporting declaration of T. Carlucci in light of comments from A. Ouellette and T. Carlucci (.9); finalize opposition and supporting declaration (1.2).	4.60	\$4,025.00
07/09/25	TFCA	Review motion to lift stay (.4); revise draft declarations (.7); review edits by A. Ouellette (.2).	1.30	\$1,787.50
07/14/25	SJM	Analyze Committee reply in support of lift stay motion (1.7); email to case team regarding arguments on same (.6).	2.30	\$2,012.50
07/21/25	AMUE	Analyze privileged issue related to lift stay order (1.4); outline strategy to address state court cases proceeding (1.3).	2.70	\$2,835.00
07/21/25	AROU	Attention to court order lifting stay on six JCCP 5108 cases.	0.50	\$437.50

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07/21/25	EPK	Email correspondence with A. Uetz and S. Moses regarding six cases to proceed in state court in light of lift stay order (.3); separate call with A. Uetz to discuss same (.2); further email correspondence with A. Uetz, E. Ridley, and E. Mazzocco regarding methodology for case selection and insurance-coverage issues (.2); conference call with A. Uetz and E. Ridley regarding insurance issues relating to six test cases and coordination for the JCCP 5108 CMC on Wednesday, July 23, 2025 (.5); email correspondence with B. Weisenberg of Lowenstein regarding coordination for the next JCCP 5108 CMC and selection of test cases (.4); review joint case management state filed in the JCCP 5108 (.1).	1.70	\$1,487.50
07/21/25	ERR	Review case status regarding issues associated with relief from stay and need for assigned counsel.	0.80	\$880.00
07/21/25	SJM	Review JCCP 5108 case management statement (.8); email to case team regarding references in same to lift stay order and next steps (.4).	1.20	\$1,050.00
07/22/25	EPK	Conference call with B. Weisenberg of Lowenstein and E. Ridley regarding Committee's selection of test cases for trial in state court following relief from stay order (.4); email correspondence with A. Uetz, M. Lee, and E. Ridley regarding same (.3).	0.70	\$612.50
07/22/25	ERR	Telephone call with Committee counsel regarding issues related to selection of cases for relief from stay (.4); follow up on same (.2).	0.60	\$660.00
07/23/25	EPK	Follow up on entry of the order granting the Committee's motion for relief from the automatic stay.	0.10	\$87.50
07/27/25	EPK	Consult with S. Moses regarding entry of lift stay order and requirements imposed by same for selection of test cases.	0.20	\$175.00
07/27/25	SJM	Email to case team regarding entered order on Committee lift stay motion.	0.20	\$175.00

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07/28/25	EPK	Email correspondence with R. Simons to confer regarding Plaintiffs' selection of "test cases" following entry of the lift stay order.	0.30	\$262.50
07/29/25	EPK	Advise A. Ouellette regarding effect of the Court's recently entered lift stay order and impact of same on co-defendants (.2); email correspondence with D. Zamora and P. Gaspari of Weintraub Tobin regarding as-entered lift stay order and effect of same (.1); conference call with R. Simons and E. Ridley regarding insurance issues relating to cases to be presented to the JCCP 5108 court (.3); review E. Ridley's post-call summary of call with R. Simons (.1); email correspondence with S. Moses and O. Rosaluk of DLA Piper regarding cases subject to lift stay order (.1).	0.80	\$700.00
07/29/25	ERR	Telephone call with Committee counsel regarding issues in connection with selection of cases regarding lift stay order.	0.50	\$550.00
07/29/25	SJM	Respond to insurer counsel regarding order on Committee lift stay motion.	0.20	\$175.00
Task Total:			37.80	\$34,039.00

004 Bankruptcy Litigation/Adversary Proceedings

07/01/25	MCM	Analyze draft answer to Committee's complaint in remaining adversary proceeding prior to filing.	0.40	\$370.00
07/01/25	SJM	Revise answer to Committee's remaining adversary proceeding (2.1); email to A. Bardos regarding same (.2); supervise filing of answer (.2); email to counsel for Committee regarding filed answer (.1).	2.60	\$2,275.00
07/03/25	GSG	Review OPF stipulation in remaining adversary proceeding.	0.10	\$105.00
07/03/25	GSG	Correspondence with R. Manns regarding OPF stipulation.	0.20	\$210.00
07/07/25	SJM	Email correspondence with Committee counsel, Foley team, and Court regarding scheduling for status conference in remaining adversary proceeding.	0.40	\$350.00

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07/13/25	GSG	Review revised stipulation regarding restricted funds case (.1); correspondence with R. Manns regarding same (.1).	0.20	\$210.00
07/14/25	GSG	Telephone conference with S. Moses regarding restricted assets issues.	0.10	\$105.00
07/14/25	MDL	Revise motion to dismiss.	1.40	\$1,225.00
07/15/25	MR	Summarize documents per request of A. Uetz and M. Lee, in furtherance of preparation for July 16, 2025 hearing in Chapter 11 proceedings.	3.40	\$2,703.00
07/17/25	SJM	Draft order to dismiss substantive consolidation adversary proceeding.	0.60	\$525.00
07/21/25	EPK	Email correspondence with A. Uetz and E. Mazzocco regarding the Committee's prior motion for derivative standing and possible renewal of same.	0.20	\$175.00
07/21/25	MDL	Revise order granting motion to dismiss Committee's substantive consolidation adversary proceeding.	0.10	\$87.50
07/21/25	SJM	Prepare proposed order dismissing substantive consolidation adversary proceeding.	0.80	\$700.00
07/22/25	MDL	Email exchange with R. Manns and J. Blanchard (Norton Rose Fulbright) regarding form of order dismissing adversary proceeding.	0.10	\$87.50
07/22/25	SJM	Email to Committee counsel and counsel for NDCes regarding order to dismiss adversary proceeding.	0.20	\$175.00
07/23/25	EPK	Review email summary prepared by S. Moses regarding the Committee's prior motion for derivative standing and potential renewal of same.	0.20	\$175.00
07/23/25	GSG	Review correspondence regarding AP dismissal order.	0.10	\$105.00
07/23/25	MDL	Analyze Committee changes to order granting motion to dismiss substantive consolidation adversary proceeding.	0.10	\$87.50
07/23/25	SJM	Analyze Committee edits to proposed order dismissing adversary proceeding.	0.20	\$175.00
07/24/25	SJM	Finalize order to dismiss adversary proceeding.	0.20	\$175.00

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07/27/25	SJM	Review entered order dismissing adversary proceeding (.2); email to J. Harrison regarding same (.1).	0.30	\$262.50
07/31/25	GSG	Telephone conference with M. Lee regarding Committee call (.2); review correspondence regarding same (.2); telephone conference with Committee counsel regarding remaining adversary proceeding (.2).	0.60	\$630.00
Task Total:			12.50	\$10,913.00

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

07/14/25	MRL	Analyze the motion for late-filed claims (.3); email correspondence with M. Moore regarding the same (.2).	0.50	\$337.50
07/17/25	MRL	Analyze the motion for late-filed claims (.9); draft a summary for the Foley team regarding the motion (.4).	1.30	\$877.50
07/18/25	MRL	Confer with M. Moore regarding the summary of the motion for late-filed claims (.2); email correspondence with the Foley team regarding the motion for late-filed claims (.3); analyze documents regarding the same (.2).	0.70	\$472.50
07/21/25	MCM	Analyze issues in connection with latest attempt to allow late-filed claims.	0.40	\$370.00
07/23/25	MCM	Analyze motion to allow late-filed claims 564 and 565 in RCBO case with supporting declarations.	0.60	\$555.00
07/24/25	MCM	Analyze issues in connection with latest motion to allow late-filed claims regarding 564 and 565 (.4); confer with M. Rofaail regarding opposition to same (.3).	0.70	\$647.50
07/24/25	MRL	Confer with M. Moore regarding drafting the Debtor's response to the motion for late-filed claims (.2); draft the Debtor's response to the motion for late-filed claims (.5).	0.70	\$472.50
07/25/25	MCM	Review Committee request for analysis of late-filed claims (.3); review claims matrix information regarding same (.4); draft proposed response with requested information (.4).	1.10	\$1,017.50

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07/25/25	MRL	Continue drafting the Debtor's response to the motion for late-filed claims.	0.90	\$607.50
07/28/25	MRL	Research case law in support of the Debtor's response to the motion for late-filed claims.	0.50	\$337.50
07/29/25	MCM	Review abuse claims register from claims and noticing agent for additional late-filed claims.	0.40	\$370.00
07/29/25	MRL	Continue drafting the Debtor's response to the motion for late-filed claims.	0.50	\$337.50
07/30/25	MRL	Confer with M. Moore regarding the Debtor's response to the motion for late-filed claims (.2); continue drafting the Debtor's response to the motion for late-filed claims (.3).	0.50	\$337.50
07/31/25	MCM	Follow-up analysis of claims issues.	0.40	\$370.00
07/31/25	MRL	Finalize drafting the Debtor's response to the motion for late-filed claims (.9); draft an email to M. Moore regarding the same (.2).	1.10	\$742.50
Task Total:			10.30	\$7,852.50

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

07/02/25	JCH	Update daily docket report.	0.20	\$66.00
07/03/25	JCH	Update daily docket report.	0.20	\$66.00
07/07/25	EPK	Oversee critical updates to the master case calendar and key dates timeline relating to plan confirmation, related discovery schedules, and contested confirmation hearing.	0.20	\$175.00
07/07/25	JCH	Begin revisions to insurance and Committee counsel spreadsheet of contacts.	0.50	\$165.00
07/07/25	JCH	Update Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$330.00
07/07/25	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.40	\$320.00
07/08/25	JCH	Update daily docket report.	0.20	\$66.00
07/08/25	JCH	Complete revisions to insurance and Committee counsel spreadsheet of contacts and related email distribution list and circulate same to Foley team.	0.50	\$165.00

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07/09/25	JCH	Update daily docket report.	0.50	\$165.00
07/10/25	JCH	Update daily docket report.	0.50	\$165.00
07/11/25	JCH	Update daily docket report.	0.50	\$165.00
07/14/25	JCH	File notice of hearing on third motion to approve insurance finance and security agreement (.2); update daily docket report (.5).	0.70	\$231.00
07/15/25	JCH	Prepare a .zip file of pleadings and responses for July 16 hearing (.5); update daily docket report (.2).	0.70	\$231.00
07/16/25	JCH	Finalize (.4) and file (.1) Debtor's motion to continue confirmation hearing; update daily docket report (.5).	1.00	\$330.00
07/17/25	JCH	Calendar hearing on motion to continue confirmation hearing (.2); update daily docket report (.5).	0.70	\$231.00
07/18/25	JCH	Update daily docket report.	0.50	\$165.00
07/21/25	EPK	Confer with S. Moses regarding August 1, 2025 removal deadline and potential need to further extend same.	0.20	\$175.00
07/21/25	JCH	Update daily docket report.	0.50	\$165.00
07/22/25	JCH	Update Timeline and Master Case Calendar (.5); calendar status conferences related to confirmation schedule (.2); update daily docket report (.5).	1.20	\$396.00
07/23/25	JCH	Update daily docket report.	0.20	\$66.00
07/24/25	JCH	Update daily docket report.	0.20	\$66.00
07/25/25	JCH	Update daily docket report.	0.20	\$66.00
07/27/25	EPK	Confer with S. Moses regarding request for further extension of removal deadline.	0.10	\$87.50
07/27/25	SJM	Email to E. Khatchatourian regarding potential motion to extend removal deadline.	0.20	\$175.00
07/28/25	EPK	Confer with S. Moses and M. Rofaail regarding motion seeking further extension of the removal deadline.	0.20	\$175.00
07/28/25	JCH	Update daily docket report.	0.50	\$165.00

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07/29/25	JCH	Update daily docket report.	0.50	\$165.00
07/30/25	JCH	Update daily docket report.	0.50	\$165.00
07/31/25	JCH	Update daily docket report.	0.50	\$165.00
Task Total:			13.30	\$5,067.50

007 Chapter 11 Plan/ Plan Confirmation

07/01/25	AMUE	Direct communications with client regarding expert reports.	0.50	\$525.00
07/01/25	AMUE	Review of privileged information concerning Debtor's expert reports.	1.20	\$1,260.00
07/01/25	EPK	Follow up with C. Moore of A&M and M. Lee regarding service of expert report.	0.10	\$87.50
07/01/25	GSG	Review K. Martens report issues (.4); telephone conference with M. Lee regarding same (.1).	0.50	\$525.00
07/01/25	MCM	Analyze draft report from NERA Consulting and forward to client parties for review (.7); email correspondence with client parties regarding same (.4); follow up with NERA prior to submission (.3); email correspondence with various parties regarding expert report dissemination (.3); analyze latest draft report from A&M prior to finalization (.4).	2.10	\$1,942.50
07/01/25	MDL	Email exchange with Hilco team regarding expert reports.	0.50	\$437.50
07/01/25	MDL	Analyze revised K. Martens expert report.	0.50	\$437.50
07/01/25	MDL	Telephone conference with D. Flanagan regarding boundaries of portions of property to be sold or lien.	0.50	\$437.50
07/01/25	MDL	Email exchange with K. Martens regarding final version of expert report.	0.20	\$175.00
07/01/25	MRL	Email correspondence with the Foley team and client regarding D. Martin's expert report (.3); revise D. Martin's expert report (.8); confer with M. Moore regarding status of expert reports and rebuttal reports (.2).	1.30	\$877.50

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07/01/25	SJM	Review multiple iterations of expert report from K. Martens (.8); telephone calls with K. Martens, G. Goodman, and M. Lee regarding revisions (.8); brief review of Committee expert reports (.6); email to clients regarding submitted expert reports (.6).	2.80	\$2,450.00
07/02/25	MCM	Analyze expert reports for Committee experts in connection with confirmation of the Debtor's third amended plan of reorganization, as well as documents produced in connection with same (1.8); follow-up work with experts to provide documentation cited in other side's reports (.5); prepare for depositions scheduled the week of July 21 and work on rebuttal report issues (.5).	2.80	\$2,590.00
07/02/25	MDL	Strategize with A. Uetz regarding expert witness discovery.	0.30	\$262.50
07/03/25	JCH	Prepare database of Debtor and Committee expert reports.	0.50	\$165.00
07/03/25	MCM	Analyze expert report of Committee expert McNally (.5); participate in conference call with RCBO expert regarding same and preparation of rebuttal (.6).	1.10	\$1,017.50
07/03/25	MDL	Begin to evaluate Committee expert reports.	0.20	\$175.00
07/03/25	MDL	Evaluate list of properties to be inspected by Stout Risius for rebuttal report.	0.20	\$175.00
07/03/25	MDL	Email exchange with C. Restel regarding properties to be inspected by Stout Risius for rebuttal report.	0.10	\$87.50
07/03/25	MDL	Email exchange with C. Moore (A&M) regarding exhibits to expert report per inquiry from Committee.	0.10	\$87.50
07/03/25	MDL	Email exchange with insurance company counsel regarding Debtor's expert reports.	0.10	\$87.50
07/03/25	MRL	Review email correspondence from the Foley team regarding the expert reports.	0.30	\$202.50
07/03/25	SJM	Emails with case team regarding insurer requests for copies of expert reports (.4); confirm service information for insurers (.8); email to insurers regarding Debtor expert reports (.4).	1.60	\$1,400.00

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07/04/25	MCM	Analyze expert reports of Committee experts in connection with confirmation and in preparation for depositions of same (2.0); work with D. Martin and NERA regarding access to expert materials relied upon by Committee claims expert (.4).	2.40	\$2,220.00
07/05/25	MCM	Attention to email correspondence from NERA regarding materials relied upon by D. Martin in expert report.	0.50	\$462.50
07/06/25	MDL	Email Lowenstein team regarding K. Martens' CV and publications.	0.10	\$87.50
07/06/25	MDL	Email exchange with A. Zimmerman regarding CV and prior testimony.	0.10	\$87.50
07/07/25	MCM	Correspondence regarding real property inspections and related issues.	0.30	\$277.50
07/07/25	MCM	Email correspondence with expert witness regarding availability for deposition and vacation schedule vis-a-vis confirmation hearing (.4); email regarding same with Foley team (.2).	0.60	\$555.00
07/07/25	MDL	Strategize for Committee Rule 30(b)(6) deposition.	0.20	\$175.00
07/07/25	MRL	Review email correspondence from the Foley team regarding D. Martin's availability.	0.20	\$135.00
07/07/25	MRM	Call with experts to discuss claims analysis.	0.30	\$202.50
07/08/25	AMUE	Meeting with M. Lee to discuss 30(b)(6) deposition (.5); outline questions for same (.6).	1.10	\$1,155.00
07/08/25	JMT	Pull Committee production for deposition prep and confer with team regarding same.	0.80	\$700.00
07/08/25	MCM	Attention to email correspondence regarding expert report issues for both sides with respect to confirmation of Debtor's plan.	0.40	\$370.00
07/08/25	MDL	Strategize with Foley team regarding Committee 30(b)(6) deposition.	0.80	\$700.00
07/08/25	MDL	Analyze Committee production in preparation for deposition of 30(b)(6) witness.	0.40	\$350.00
07/08/25	MRL	Analyze the Committee's expert report of K. McNally to provide a summary to the Foley team.	0.60	\$405.00

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07/09/25	AMUE	Prepare questions for 30(b)(6) deposition of Committee.	0.80	\$840.00
07/09/25	MCM	Confer with M. Rofaail regarding K. McNally's expert opinion and basis for rebuttal to same (.5); review materials produced in connection with same (.4); prepare for and participate in conference call with NERA regarding rebuttal report (.8); conference call with Judge Hogan, representative of unknown claims and other parties regarding plan, vote, and next steps (.5).	2.20	\$2,035.00
07/09/25	MDL	Strategize regarding response to R. Klomprens' expert report.	0.20	\$175.00
07/09/25	MDL	Email exchange with K. Martens regarding expert report supplemental documents and deposition preparation.	0.20	\$175.00
07/09/25	MDL	Email exchange with J. Satter and A. Zimmerman (Hilco) regarding expert report supplemental documents and deposition preparation.	0.30	\$262.50
07/09/25	MDL	Email exchange with R. Chalil regarding expert depositions and supplemental documentation relating to expert witnesses.	0.20	\$175.00
07/09/25	MDL	Prepare outline for S. Woodall deposition.	4.10	\$3,587.50
07/09/25	MDL	Analyze documents produced by Committee in preparation for S. Woodall deposition.	0.50	\$437.50
07/09/25	MRL	Confer with M. Moore regarding the McNally expert report (.4); analyze the Committee's expert report of K. McNally to provide a summary to the Foley team (.8); analyze the Committee's expert report of K. McNally in preparation for the deposition (1.4).	2.60	\$1,755.00
07/09/25	SJM	Respond to email from M. Lee regarding K. Martens' compensation disclosure.	0.30	\$262.50
07/09/25	TND	Research on unknown claims reserve amounts in confirmed diocesan bankruptcy plans.	1.80	\$1,440.00
07/10/25	AMUE	Finalize outline and questions for 30(b)(6) deposition of Committee.	1.50	\$1,575.00
07/10/25	GSG	Review expert report of R. Klomprens (.7); comment on same (.3).	1.00	\$1,050.00

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07/10/25	MDL	Take deposition of S. Woodall.	2.40	\$2,100.00
07/10/25	MDL	Prepare for deposition of S. Woodall.	2.60	\$2,275.00
07/10/25	MDL	Update Foley team on S. Woodall deposition.	0.20	\$175.00
07/10/25	MRL	Analyze the Committee's expert report of K. McNally in preparation for the deposition (.5); draft an email to the Foley team regarding the same (.7).	1.20	\$810.00
07/10/25	TND	Further research on Unknown Claims Reserve amounts in confirmed diocesan plans.	0.20	\$160.00
07/11/25	MRL	Review email correspondence from the Foley team regarding the scheduling of expert depositions.	0.20	\$135.00
07/13/25	SJM	Prepare draft stipulation for stay of plan confirmation schedule.	2.20	\$1,925.00
07/14/25	AMUE	Analyze privileged issue to provide advice to client regarding confirmation strategy (1.4); provide advice to client regarding same (.8); communications with M. Kemner regarding same (.5).	2.70	\$2,835.00
07/14/25	AMUE	Draft motion to extend confirmation hearing dates.	1.20	\$1,260.00
07/14/25	MCM	Attention to plan confirmation issues, including schedule with respect to expert reports and depositions.	0.50	\$462.50
07/14/25	MDL	Email exchanges with experts for Debtor regarding revised deposition schedule and rebuttal report deadline.	0.50	\$437.50
07/14/25	MRM	Strategize regarding case status and next steps.	0.50	\$337.50
07/14/25	SJM	Review research from M. Berg regarding continuance of confirmation hearing (.3); email regarding further research (.2); email to A. Uetz regarding same (.3).	0.80	\$700.00
07/15/25	AMUE	Draft motion to extend confirmation schedule (1.3); communications with finance team regarding same (.8).	2.10	\$2,205.00

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07/15/25	EPM	Confer with T. Dolcourt regarding prior briefing on impact of plan on various claims against insurers.	0.50	\$420.00
07/15/25	MDL	Telephone conference with J. Satter and A. Zimmerman regarding R. Rosen expert report and rebuttal to same.	0.80	\$700.00
07/15/25	MDL	Begin drafting motion to continue confirmation hearing.	0.80	\$700.00
07/15/25	MDL	Analyze R. Rosen expert report.	0.20	\$175.00
07/15/25	TND	Research on varying approaches to insurance assignments (2.5); draft summary of same (.4).	2.90	\$2,320.00
07/16/25	GSG	Review RCBO expert report and response issues.	0.20	\$210.00
07/16/25	MDL	Evaluate R. Klomparens' expert report and possible rebuttal report.	0.10	\$87.50
07/16/25	MDL	Email exchange with K. Martens regarding sources cited in expert report and deposition scheduling.	0.20	\$175.00
07/16/25	MDL	Revise motion for continuance of confirmation hearing.	0.40	\$350.00
07/16/25	SJM	Revise motion to continue confirmation hearing.	0.70	\$612.50
07/16/25	TND	Revisions to motion to adjourn confirmation schedule.	0.80	\$640.00
07/17/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding expert report deadlines and depositions.	0.30	\$262.50
07/17/25	MRL	Research issues regarding parishes contributing to diocese plans.	0.50	\$337.50
07/18/25	MCM	Analysis of draft rebuttal expert reports and related issues.	0.50	\$462.50
07/18/25	MRL	Finalize researching issues regarding parishes contributing to diocese plans (.5); draft an email to M. Moore regarding the outcome of the research (.2).	0.70	\$472.50
07/18/25	SJM	Assist with preparation for further hearing on motion to continue confirmation.	1.80	\$1,575.00

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07/18/25	SJM	Review Pacific insurer filing regarding motion to continue confirmation hearing.	0.40	\$350.00
07/21/25	EPM	Review Committee motion for derivative standing and related briefing.	0.70	\$588.00
07/21/25	MCM	Review proposed order continuing confirmation hearing schedule following hearings on same.	0.30	\$277.50
07/21/25	MRL	Review email correspondence regarding the rebuttal expert report.	0.20	\$135.00
07/21/25	MRM	Strategize regarding motion for continuance, next steps, and open action items in need of attention in light of new deadlines.	0.70	\$472.50
07/22/25	SJM	Draft proposed order to pause confirmation hearing and related matters.	1.40	\$1,225.00
07/23/25	MDL	Email exchange with J. Satter regarding rebuttal report and previous publications.	0.10	\$87.50
07/23/25	MDL	Email correspondence with K. Martens regarding works cited in expert report.	0.10	\$87.50
07/23/25	MDL	Email exchange with Lowenstein team regarding proposed order granting motion for continuance.	0.10	\$87.50
07/23/25	MDL	Revise proposed order granting motion for continuance.	0.40	\$350.00
07/23/25	MDL	Email exchange with D. Martin regarding rebuttal expert report and list of publications.	0.30	\$262.50
07/23/25	MDL	Strategize regarding terms of proposed order granting continuance.	0.30	\$262.50
07/23/25	MDL	Email exchange with expert witnesses regarding continuance of confirmation hearing.	0.30	\$262.50
07/23/25	MRL	Review email correspondence from M. Lee regarding the deadlines for expert reports.	0.20	\$135.00
07/24/25	MCM	Attention to expert matters in connection with continued hearing on confirmation.	0.30	\$277.50
07/24/25	SJM	Analyze Committee edits to order continuing confirmation scheduling including review of relevant sections of transcript.	0.40	\$350.00

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07/30/25	EPM	Review proposed revisions to confirmation order language.	0.70	\$588.00
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Task Total:	77.60	\$68,173.50
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008 Communications with Client

07/01/25	MCM	Correspondence with client parties regarding deposition transcript issues.	0.40	\$370.00
07/03/25	MDL	Email exchange with A. Bardos and R. Medeiros regarding properties to be inspected by Stout Risius for rebuttal report.	0.20	\$175.00
07/06/25	MDL	Email exchange with A. Bardos regarding church visits by Stout Risius.	0.30	\$262.50
07/08/25	AMUE	Meeting with M. Kemner regarding privileged issue (.6); communications with finance team regarding cash forecast (.6).	1.20	\$1,260.00
07/08/25	MDL	Telephone conference with M. Kemner and A. Uetz regarding discovery progress and expert rebuttals.	0.50	\$437.50
07/10/25	SJM	Email to client regarding Committee lift stay motion.	0.40	\$350.00
07/14/25	MCM	Correspondence with client parties regarding information requests.	0.40	\$370.00
07/14/25	MDL	Email exchange with M. Kemner regarding confidential mediation subject.	0.20	\$175.00
07/15/25	AMUE	Communication with M. Kemner regarding privileged discovery issue.	0.90	\$945.00
07/15/25	AMUE	Draft privileged executive summary for client leadership regarding certain rulings by the Court during hearing today.	1.20	\$1,260.00
07/15/25	MCM	Analyze issues in connection with Committee requests for information (.5); correspondence regarding same with Foley team (.3).	0.80	\$740.00
07/16/25	AMUE	Draft privileged communication to client leadership regarding court hearing today.	1.50	\$1,575.00

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07/16/25	MDL	Telephone conference with A. Bardos and M. Kemner regarding responses to Committee supplemental document requests.	0.90	\$787.50
07/16/25	MDL	Email exchange with M. Kemner regarding communication with Committee counsel about confidential mediation issue.	0.20	\$175.00
07/16/25	MDL	Email exchange with R. Medeiros and A. Bardos regarding documents to be collected and produced as part of responses to Committee's supplemental document requests.	0.40	\$350.00
07/16/25	MDL	Email exchange with M. Kemner regarding communication with Committee counsel about confidential mediation issue.	0.20	\$175.00
07/16/25	SJM	Call with M. Lee, R. Medeiros and A. Bardos regarding search for any further documents regarding privileged issue.	0.80	\$700.00
07/17/25	MDL	Email exchange with R. Medeiros, M. Kemner, and A. Bardos regarding Committee's supplemental document request.	0.30	\$262.50
07/17/25	MDL	Telephone conference with R. Medeiros, M. Kemner, and A. Bardos regarding Committee's supplemental document request.	0.50	\$437.50
07/21/25	AMUE	Communication with A. Bardos regarding cash forecast.	0.40	\$420.00
07/21/25	AMUE	Draft communication with client leadership regarding privileged issue concerning extension hearing.	1.10	\$1,155.00
07/21/25	MCM	Analyze comprehensive status update to client.	0.50	\$462.50
07/24/25	MDL	Telephone conference with A. Bardos, D. Flanagan, C. de Quesada, and A. Uetz regarding cash forecast and property sales.	1.10	\$962.50
07/29/25	MDL	Email exchange with A. Bardos regarding revisions to communication with priests about asset sales.	0.10	\$87.50
07/29/25	TND	Revise communication to parish regarding property sales.	0.50	\$400.00
07/30/25	AMUE	Finalize memorandum to client leadership regarding privileged issue.	1.20	\$1,260.00

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07/30/25	MDL	Begin drafting email to R. Ozer regarding searches for electronic documents responsive to Committee's supplemental document requests.	0.80	\$700.00
07/30/25	MDL	Telephone conference with M. Kemner and P. Glaessner regarding ability to produce documents regarding non-debtor individuals' health care.	0.80	\$700.00
07/31/25	MDL	Telephone conference with A. Bardos regarding CMS divestment motion and upcoming asset sales.	0.10	\$87.50
07/31/25	MDL	Complete communication to R. Ozer regarding collection of emails responsive to Committee supplemental discovery requests.	0.20	\$175.00
07/31/25	MDL	Email exchange with M. Kemner regarding Priest Personnel Board members and Adult Review Board members.	0.10	\$87.50
Task Total:			18.20	\$17,305.00

011 Cash Management

07/01/25	AMUE	Analyze privileged cash management issue.	0.50	\$525.00
07/07/25	AMUE	Analyze cash issues.	1.10	\$1,155.00
07/08/25	MCM	Review correspondence regarding CCCEB funding request and related documentation.	0.20	\$185.00
07/09/25	SJM	Send notice to Committee and U.S. Trustee of quarterly payment to CCCEB.	0.30	\$262.50
07/10/25	AMUE	Meeting with A&M regarding strategy in light of cash forecast (.8); review documents related to cash forecast (.8).	1.60	\$1,680.00
07/10/25	SJM	Analyze approach in light of Committee objection to CCCEB payment (.4); email to A. Uetz and M. Lee regarding same (.3).	0.70	\$612.50

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07/11/25	AMUE	Analyze issues related to CCCEB facility payment (.5) and meeting with M. Lee, M. Moore and S. Moses regarding same (.5); meeting with C. Moore regarding cash projections (.5); meeting with finance team and M. Kemner regarding cash projections (1.0); analyze privileged issue regarding cash projections to make recommendation to client leadership (.9); draft recommendations to client leadership regarding same (1.2).	4.60	\$4,830.00
07/11/25	MCM	Conference call with Foley team regarding Committee objection to ordinary-course CCCEB payment where no previous objection had been received.	0.50	\$462.50
07/11/25	MCM	Participate in conference call with finance team and other professionals regarding cash forecast for RCBO and related issues in connection with confirmation of third amended plan.	1.00	\$925.00
07/11/25	MDL	Strategize with Foley team regarding opposition to Committee's objection to CCCEB rent payment.	0.50	\$437.50
07/11/25	SJM	Meeting with A. Uetz and M. Lee regarding approach in light of Committee objection to CCCEB payment (.5); prepare for same (.2).	0.70	\$612.50
07/13/25	AMUE	Analyze privileged issue regarding cash forecast (1.2); communication with M. Kemner regarding same (.5); draft privileged recommendation to client regarding same (1.5); analyze schedule in light of cash forecast (.9).	4.10	\$4,305.00
07/14/25	MCM	Analysis of issues related to CCCEB ordinary-course payments (.4); review prior email correspondence regarding same (.3); confer with M. Rofaail regarding response to Committee opposition (.3).	1.00	\$925.00
07/14/25	MDL	Strategize for response to Committee's CCCEB payment objection.	0.80	\$700.00
07/14/25	MRL	Confer with M. Moore regarding drafting a response to the Committee's objection to the CCCEB payment (.3); begin drafting the response to the Committee's objection to the CCCEB payment (1.5).	1.80	\$1,215.00

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07/14/25	SJM	Analyze strategy for response to Committee objection to payment of CCCEB payment (.4); email to case team regarding same (.3); review A. Bardos' deposition transcript regarding CCCEB issues (.5).	1.20	\$1,050.00
07/15/25	MCM	Revise Debtor's response to Committee objection to payment of ordinary-course amounts to CCCEB pursuant to longstanding arrangement (1.0); conference call with A. Bardos and D. Flanagan regarding same (.4); analyze documentation provided by D. Flanagan of prior payments (.4); revise declarations and confer with M. Rofaeil regarding same (.5).	2.30	\$2,127.50
07/15/25	MDL	Revise brief in opposition to Committee's objection to CCCEB quarterly payment.	1.10	\$962.50
07/15/25	MRL	Continue drafting the response to the Committee's objection to the CCCEB payment (1.4); draft the declarations in support of the response (.7); revise the response to conform to M. Moore's comments (1.0); email correspondence with the Foley team regarding filing the response (.5).	3.60	\$2,430.00
07/15/25	SJM	Revise response to Committee objection to payment to CCCEB (1.7); finalize response and related filings (.7).	2.40	\$2,100.00
07/16/25	MCM	Finalize documents for filing in connection with Committee objection to CCCEB payments (.6); prepare for hearing on same (.4).	1.00	\$925.00
07/18/25	AMUE	Review cash forecast in light of possible extension of confirmation schedule.	1.10	\$1,155.00
07/21/25	SJM	Review detailed accounting of use of CCCEB funds (.3); emails to case team and client regarding same (.3); draft email to Committee regarding same (.4).	1.00	\$875.00
07/22/25	MDL	Analyze CCCEB funding detail and expense breakdown.	0.10	\$87.50
07/22/25	MDL	Email correspondence with B. Weisenberg (Lowenstein) regarding CCCEB funding detail and expense breakdown.	0.10	\$87.50
07/22/25	SJM	Call with A. Bardos regarding clarification on CCCEB funding.	0.30	\$262.50

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07/24/25	AMUE	Prepare for meeting with finance team regarding cash forecast including assumptions (2.1); meeting with finance team regarding same (1.4).	3.50	\$3,675.00
07/24/25	SJM	Prepare analysis of pending fee holdback amounts (1.4); email to A. Uetz regarding same (.2).	1.60	\$1,400.00
07/30/25	SJM	Review documents regarding potential transfer of gift proceeds (.3); email to client regarding additional information needed for same (.1).	0.40	\$350.00
Task Total:			39.10	\$36,320.00

016 General Case Strategy (includes team calls)

07/01/25	MCM	Analyze filings in Fresno diocese bankruptcy case filed in the Eastern District of California.	0.50	\$462.50
07/01/25	MRL	Review pending dioceses cases to provide an update on their status to client.	1.40	\$945.00
07/02/25	AMUE	Strategize with M. Lee regarding privileged issue concerning case status (.3); follow up on same (.3).	0.60	\$630.00
07/02/25	AMUE	Analyze privileged issue concerning interim compensation.	0.80	\$840.00
07/05/25	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.70	\$472.50
07/07/25	AMUE	Analyze privileged issue concerning plan confirmation schedule and administrative expenses.	1.50	\$1,575.00
07/07/25	MCM	Strategize with Foley team regarding various confirmation issues.	0.50	\$462.50
07/07/25	MRL	Summarize daily docket activity and upcoming deadlines for client (.9); email correspondence with J. Harrison regarding the weekly update email (.2).	1.10	\$742.50
07/08/25	AMUE	Meeting with M. Lee, M. Moore and S. Moses regarding settlement issues (1.0); analyze privileged issue concerning same (1.2).	2.20	\$2,310.00
07/08/25	MCM	Correspondence regarding potential dates for court hearings with respect to potential resolutions.	0.30	\$277.50

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07/08/25	MCM	Conference call with M. Lee and A. Uetz regarding Committee issues and depositions (.5); prepare for and participate in conference call with Foley team regarding case status and strategy (1.0); analyze documents produced by the Committee in response to Debtor's requests for production (.9).	2.40	\$2,220.00
07/08/25	MDL	Strategize with Foley team regarding settlement options.	1.10	\$962.50
07/08/25	MRL	Email correspondence regarding the weekly update email to the client.	0.30	\$202.50
07/08/25	SJM	Meeting with A. Uetz, M. Lee, and M. Moore regarding potential settlement strategy.	1.10	\$962.50
07/10/25	MCM	Conference call with A&M and Foley teams regarding go-forward strategy in bankruptcy case.	0.80	\$740.00
07/10/25	MDL	Strategize with Foley team regarding end of case procedural moves.	1.00	\$875.00
07/10/25	SJM	Attend strategy meeting regarding next steps with Foley team and A&M.	0.70	\$612.50
07/14/25	AMUE	Meeting with Foley team regarding strategy for multiple matters set for hearing Wednesday (.7); outline matters for hearing regarding timing and extension motion in preparation for hearing on same (1.2).	1.90	\$1,995.00
07/14/25	MCM	Prepare for and participate in conference call with Foley team regarding case strategy and status.	0.70	\$647.50
07/14/25	MDL	Strategize with Foley team regarding recent Committee actions (.7); analyze Debtor's potential responses to same (.7).	1.40	\$1,225.00
07/14/25	MR	Attend strategy call regarding privileged matters with A. Uetz , M. Lee, M. Moore, A. Nann, S. Moses and M. Rofaail.	0.60	\$477.00
07/14/25	MRL	Attend all-hands meeting with the Foley team in preparation for the hearing.	0.60	\$405.00
07/14/25	SJM	Attend RCBO all-hands meeting.	0.50	\$437.50
07/15/25	GSG	Draft talking points for restricted assets status (.8); telephone conference with A. Uetz regarding same (.2).	1.00	\$1,050.00

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07/15/25	MDL	Telephone conference with A&M and A. Uetz regarding possible motion for continuance of confirmation hearing and status of discussions with Committee and insurers over global resolution.	0.50	\$437.50
07/15/25	MDL	Strategize regarding framing of 7/16 hearing, oral arguments for pending motions, and potential motion to continue confirmation hearing.	2.20	\$1,925.00
07/16/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.50	\$337.50
07/16/25	SJM	Call with M. Lee and A. Uetz following hearing to discuss next steps.	0.40	\$350.00
07/17/25	GSG	Review correspondence regarding ruling on RCWC et al. adversary proceeding (.1); telephone conference with S. Moses regarding same (.1).	0.20	\$210.00
07/17/25	MDL	Telephone conference with A. Uetz regarding next steps in case following granting of lift stay motion and granting of motion to dismiss adversary proceeding.	0.40	\$350.00
07/18/25	GSG	Review summary regarding confirmation and restricted asset schedule.	0.20	\$210.00
07/18/25	MDL	Telephone conference with M. Moore regarding case strategy following either result on hearing on motion for continuance.	0.80	\$700.00
07/18/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.70	\$472.50
07/20/25	MRL	Review pending dioceses cases to provide an update on their status to client.	1.30	\$877.50
07/21/25	GSG	Review proposed order on motion to dismiss the alter ego claim.	0.20	\$210.00
07/21/25	MRL	Review email correspondence from A. Uetz regarding status of the case following the hearing.	0.30	\$202.50
07/21/25	SJM	Email to E. Mazzocco regarding privileged matter related to potential motion.	0.30	\$262.50
07/22/25	MDL	Strategize with A. Uetz regarding schedule for remaining adversary proceeding and main bankruptcy case.	0.30	\$262.50

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07/22/25	MRL	Summarize daily docket activity and upcoming deadlines for client (1.1); email correspondence with the Foley team regarding the same (.2).	1.30	\$877.50
07/22/25	SJM	Email memo to A. Uetz and M. Lee regarding approach to certain privileged strategic matters.	2.60	\$2,275.00
07/23/25	MRL	Summarize daily docket activity and upcoming deadlines for client (.3); update the timeline and master case calendar (.5).	0.80	\$540.00
07/24/25	AMUE	Meeting with R. Manns regarding outcome of subcon adversary proceeding.	0.50	\$525.00
07/24/25	MDL	Strategize with Foley team regarding First Amendment issue.	0.40	\$350.00
07/24/25	MDL	Telephone conference with R. Manns and J. Blanchard (Norton Rose Fulbright) and A. Uetz regarding continuance of confirmation hearing, dismissal of adversary proceeding, and options for next steps in main case.	0.60	\$525.00
07/24/25	SJM	Call with Foley team, VeraCruz, and A&M regarding cash forecast issues.	1.10	\$962.50
07/26/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.60	\$405.00
07/27/25	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to client.	0.70	\$472.50
07/28/25	MCM	Conference call with M. Lee regarding case strategy and next steps (.5); analysis of strategy following same (.3); review email correspondence with Foley team and approve same (.3).	1.10	\$1,017.50
07/28/25	MDL	Strategize with M. Krueger and D. Wentham (both of Foley) regarding First Amendment issue raised by Committee.	0.70	\$612.50
07/28/25	MDL	Strategize with M. Moore regarding possible case conclusion outcomes and options.	1.40	\$1,225.00
07/29/25	AMUE	Meeting with M. Lee and M. Moore regarding settlement strategy (1.0); prepare for same (.8).	1.80	\$1,890.00
07/29/25	MCM	Analysis of issues relating to insurance adversary proceeding and next steps in connection with same.	0.40	\$370.00

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07/29/25	MDL	Strategize with A. Uetz and M. Moore regarding possible case conclusion strategies.	0.90	\$787.50
07/30/25	MDL	Revise memorandum to client on privileged matter for debtors.	0.60	\$525.00
07/30/25	MRL	Correspond with M. Moore regarding an update in the Rochester diocese bankruptcy case.	0.20	\$135.00
07/30/25	TFCA	Review documents regarding privileged issue (.3); telephone call with M. Lee regarding same (.3); telephone call with M. Kemner, P. Glaessner and M. Lee regarding same (.7).	1.30	\$1,787.50
07/31/25	MCM	Additional analysis of potential strategy for resolution of RCBO chapter 11 bankruptcy case.	0.60	\$555.00
07/31/25	MDL	Strategize with Foley team regarding upcoming asset sales.	0.20	\$175.00
07/31/25	MDL	Discuss discovery strategy, adversary proceeding strategy, and case endgame strategy with A. Uetz.	0.40	\$350.00
Task Total:			50.20	\$44,699.50

017 Hearings and Court Matters

07/14/25	TND	Assist with preparation for July 16 hearing.	0.90	\$720.00
07/15/25	AMUE	Prepare for hearing on multiple matters (lift stay motion/CCCEB objection/objection to professional fees) (1.5); draft opening statement for hearing (1.8).	3.30	\$3,465.00
07/15/25	MDL	Revise outline for opening presentation at 7/16 hearing.	0.30	\$262.50
07/15/25	TND	Prepare information to be used in July 16 hearing on various motions to be heard and case status.	1.40	\$1,120.00
07/16/25	AMUE	Prepare for (4.4) and appearance at (4.0) hearing on multiple matters (motion to extend confirmation schedule, fee application objection, adversary proceeding scheduling order and adversary proceeding court decision).	8.40	\$8,820.00
07/16/25	MCM	Attend hearings on renewed motion to modify the automatic stay, motion to approve insurance financing, status conference on adversary proceeding, and related matters (partial).	3.50	\$3,237.50

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07/16/25	MDL	Strategize for hearing on renewed motion to lift stay, CCCEB payment objection, fee statement objection, and adversary proceeding decision conference.	1.40	\$1,225.00
07/16/25	MDL	Attend court hearing via Zoom and advise attorneys for Debtor via written communication.	3.80	\$3,325.00
07/16/25	SJM	Prepare for hearings on lift stay motions, CCCEB payment, interim compensation, and related matters (3.8); confer with J. Daniels regarding lift stay motion (.3).	4.10	\$3,587.50
07/16/25	SJM	Attend hearings on multiple matters.	3.80	\$3,325.00
07/16/25	TND	Prepare information for hearing on various motions (.5); attend hearing via videoconference on various matters (3.8); prepare high-level summary of rulings from Court for distribution to client (.3).	4.60	\$3,680.00
07/18/25	AMUE	Prepare for (1.5) and appearance at (1.0) court hearing regarding motion to extend confirmation scheduling order.	2.50	\$2,625.00
07/18/25	MCM	Prepare for hearing on confirmation schedule extension with M. Lee (.5); attend hearing on same (1.0); debrief with Foley team regarding outcome (.3).	1.80	\$1,665.00
07/18/25	MDL	Strategize with A. Uetz regarding motion for continuance hearing.	0.40	\$350.00
07/18/25	MDL	Attend hearing on motion for continuance and advise hearing team during same.	1.00	\$875.00
07/18/25	SJM	Attend hearing on motion to continue confirmation schedule.	1.10	\$962.50
07/18/25	TND	Prepare outline for A. Uetz for hearing on motion to adjourn confirmation dates (1.4); review Pacific Insurers' response on motion to adjourn and citations included in response (.7); high-level review of recovery in New Orleans plan (.2).	2.30	\$1,840.00
Task Total:			44.60	\$41,085.00

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018 Non-Bankruptcy Litigation

07/08/25	AROU	Analyze status of JCCP 5108 cases.	0.80	\$700.00
07/21/25	AROU	Attention to JCCP 5108 case management conference statement.	0.30	\$262.50
07/21/25	AROU	Correspond with Institutional Liaison Counsel in JCCP 5108.	0.10	\$87.50
07/21/25	SJM	Analyze issues related to removal of state court actions in light of approaching removal deadline.	0.40	\$350.00
07/23/25	EPK	Coordinate with defense liaison counsel D. Zamora of Weintraub Tobin regarding today's CMC in the JCCP 5108 and related stay-relief issues (.4); email correspondence with B. Weisenberg of Lowenstein, R. Simons, and D. Zamora regarding same (.5); attend the monthly CMC in the JCCP 5108 (1.2); post-conference update to the Foley team (.1).	2.20	\$1,925.00
07/29/25	AROU	Respond to correspondence from counsel for Sisters of St. Joseph regarding lift stay order.	0.30	\$262.50
Task Total:			4.10	\$3,587.50

020 Retention/Billing/Fee Applications for Debtor Professionals

07/08/25	TND	Email correspondence with I. Velikova regarding NERA fee statement.	0.20	\$160.00
07/09/25	TND	Call with I. Velikova regarding NERA fee statement questions.	0.30	\$240.00
07/10/25	FOC	Review real estate consultant agreement (.6); draft additional language to be included (.4).	1.00	\$850.00
07/10/25	SJM	Email correspondence regarding Century Urban consulting agreement.	0.20	\$175.00
07/10/25	TND	Confer with A. Uetz and F. O'Connor on real estate consultant agreement (.2); begin review of same (.2).	0.40	\$320.00
07/11/25	FOC	Draft proposed revisions for real estate contractor agreement.	0.30	\$255.00
07/11/25	JCH	Prepare draft certificate of no objection to Foley's May 2025 monthly fee statement.	0.50	\$165.00

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07/11/25	SJM	Revise CNO for Foley monthly fee statement.	0.30	\$262.50
07/11/25	TND	Further review of real estate consultant agreement (.4); revise real estate consultant agreement to incorporate comments from A. Uetz and F. O'Connor (1.1); correspondence with A. Uetz regarding same (.3); email correspondence with A. Uetz and M. Lee on interim comp order provisions and requirements (.6).	2.40	\$1,920.00
07/14/25	SJM	Prepare CNO for Foley monthly fee statement.	0.30	\$262.50
07/14/25	TND	Review questions related to Foley June fee statement (.2); review CNO issues for May fee statement (.2).	0.40	\$320.00
07/15/25	MDL	Telephone conference with J. Prol and B. Weisenberg regarding meet and confer on Committee's May 2025 fee statement.	1.00	\$875.00
07/15/25	TND	Review Verita fee statement (.2); update to Verita cover sheet to reflect new order on monthly payments (.2); begin to review NERA time entries to ensure compliance with U.S. Trustee guidelines (.2).	0.60	\$480.00
07/17/25	TND	Begin preparing information for Foley June fee statement (1.3); prepare amended CNO on Foley May fees (.4).	1.70	\$1,360.00
07/18/25	SJM	Finalize amended CNO regarding Foley May fee statement.	0.20	\$175.00
07/18/25	TND	Further work on June Foley fee statement to ensure compliance with U.S. Trustee guidelines.	0.20	\$160.00
07/19/25	TND	Further preparation of Foley June fee statement to ensure compliance with U.S. Trustee guidelines.	0.40	\$320.00
07/21/25	TND	Further preparation of June fee statement to ensure compliance with U.S. Trustee guidelines.	1.90	\$1,520.00
07/22/25	TND	Further work on June fee statement to ensure compliance with U.S. Trustee guidelines.	0.50	\$400.00
07/23/25	TND	Further preparation of June Foley fee statement to ensure compliance with U.S. Trustee guidelines (2.4); prepare cover sheet for NERA monthly fee application (.3).	2.70	\$2,160.00

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07/24/25	TND	Review of fees for June from Debtor professionals for tracker updates (.3); review Verita application for May (.2); communications with N. Corbett regarding A&M application (.2).	0.70	\$560.00
07/25/25	TND	Email with J. Harrison on Verita May fee statement (.1); provide comments on A&M May/June fee statement (.6); email to N. Corbett on A&M application (.1).	0.80	\$640.00
07/28/25	TND	Revise A&M May/June fee statement (.3); communications with N. Corbett regarding same (.1).	0.40	\$320.00
07/29/25	MDL	Revise letter to fee examiner responding to informal objection.	0.10	\$87.50
07/29/25	SJM	Review matters raised in fee examiner's initial report on Foley interim fee application (.9); draft response letter (.6).	1.50	\$1,312.50
07/29/25	TND	Review questions from I. Velikova regarding fee statement for NERA.	0.20	\$160.00
07/30/25	AMUE	Finalize monthly fee statement.	1.50	\$1,575.00
07/30/25	JCH	Prepare Foley June 2025 monthly fee statement (.8); file June 2025 monthly fee statements for Foley, A&M, Verita and NERA (.8).	1.60	\$528.00
07/30/25	SJM	Review status of NERA employment application (.3); email to T. Dolcourt and J. Harrison regarding finalizing proposed order on same (.1); review proposed order (.1).	0.50	\$437.50
07/30/25	TND	Finalize Foley June fee statement (1.0); work on finalization of NERA fee statement and related issues (.8).	1.80	\$1,440.00
Task Total:			24.60	\$19,440.50

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021 Retention/Fee Applications: Ordinary Course Professionals

07/10/25	AMUE	Communications with client regarding retention agreement for real estate professional (.8) and review proposed agreement (.5).	1.30	\$1,365.00
07/24/25	TND	Review issues related to Century Urban OCP retention (.2); email correspondence with CU team on connections check and documents needed for OCP retention (.3).	0.50	\$400.00
07/25/25	TND	Provide comments on M. Kemner June 2025 invoice.	0.20	\$160.00
07/28/25	TND	Work on Century Urban OCP disclosures.	0.20	\$160.00
07/30/25	TND	Email correspondence with B. Sparkman on OCP retention matters.	0.20	\$160.00
07/31/25	TND	Further preparation of Century Urban OCP retention declaration, questionnaire, and notice (.5); email to B. Sparkman regarding retention (.1).	0.60	\$480.00
Task Total:			3.00	\$2,725.00

022 Retention/Fee Applications: Other Professionals

07/01/25	JCH	Prepare chart of interim payments to case professionals for May 2025 monthly fee statements.	0.50	\$165.00
07/01/25	TND	Begin reviewing May fee statements filed by Committee professionals.	0.30	\$240.00
07/02/25	TND	Further review of Committee professional fee applications (1.0); analyze potential objections to same (.7).	1.70	\$1,360.00
07/05/25	TND	Review Lowenstein May fee statement.	0.40	\$320.00
07/08/25	TND	Further review of Lowenstein May fee statement (.9); draft objection to same (1.4).	2.30	\$1,840.00
07/09/25	SJM	Email to client regarding monthly fee statement and expected payments.	0.60	\$525.00
07/09/25	TND	Further preparation of objection to Lowenstein fee application.	4.10	\$3,280.00

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07/10/25	AMUE	Finalize objection to Lowenstein's monthly fee application.	1.00	\$1,050.00
07/10/25	TND	Revise objection to Lowenstein May fee statement to incorporate A. Uetz's comments (.8); research on same (1.1); strategize with Foley team on same (.2); email correspondence to Lowenstein and notice parties (.2); email to A. Bardos regarding same (.1).	2.40	\$1,920.00
07/13/25	SJM	Draft response to B. Weisenberg regarding Committee fee statement.	0.50	\$437.50
07/14/25	SJM	Analyze issue regarding local rule on CNOs in connection with Committee motion on interim fee order.	0.30	\$262.50
07/14/25	TND	Review correspondence and information related to objection to Lowenstein fees (.4); review information related to objection and response to proposed motion to be filed by Lowenstein (.8).	1.20	\$960.00
07/15/25	MDL	Evaluate Committee May 2025 fee statement, Debtor's objection to same, and possible points of compromise.	0.30	\$262.50
07/15/25	SJM	Draft opposition to Committee motion to enforce interim compensation order.	3.60	\$3,150.00
07/15/25	TND	Confer with M. Lee on objection to Lowenstein fees.	0.30	\$240.00
07/17/25	TND	Prepare objection to proposed order on interim compensation motion.	0.70	\$560.00
07/22/25	SJM	Email to client regarding payment of May professional fees.	0.40	\$350.00
07/24/25	JCH	Update Professional Fee Tracker, including update of monthly fees side by side.	1.20	\$396.00
07/25/25	JCH	Finish update of monthly fees side by side on professional fee tracker.	0.80	\$264.00
07/30/25	JCH	Prepare chart of interim payments due to all case professionals for June 2025 monthly fee statements and email same to S. Moses.	0.50	\$165.00
Task Total:			23.10	\$17,747.50

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023 Schedules/ Statement of Financial Affairs

07/21/25	EPK	Email correspondence with P. Bongiovanni regarding schedules amendment for certain service provider claims.	0.10	\$87.50
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Task Total:	0.10	\$87.50
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025 U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating

07/19/25	EPK	Email correspondence with D. Flanagan of VeraCruz regarding review of June 2025 monthly operating report and comments to same (.2); review preliminary draft of June 2025 monthly operating report (.4).	0.60	\$525.00
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07/21/25	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding final approval of revised June 2025 MOR for filing and service today (.2); review as-filed June 2025 MOR (.1).	0.30	\$262.50
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07/21/25	JCH	File June 2025 monthly operating report and circulate a filed copy of same to client group and E. Khatchatourian.	0.50	\$165.00
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07/23/25	EPK	Email correspondence with D. Flanagan of VeraCruz regarding calculation and payment of U.S. Trustee fees for the quarter ended June 30, 2025.	0.10	\$87.50
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07/28/25	MDL	Email correspondence with J. Blumberg (U.S. Trustee's office) regarding status of existing deadlines following confirmation continuance.	0.10	\$87.50
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07/29/25	EPK	Email correspondence with D. Flanagan of VeraCruz and K. Farrar regarding June MOR supplements for the BRG team.	0.10	\$87.50
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Task Total:	1.70	\$1,215.00
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026 Unsecured Creditor Issues/Communications/Meetings

07/01/25	AMUE	Communications with J. Prol regarding next steps in the case.	0.50	\$525.00
07/01/25	MDL	Email exchange with counsel for Committee regarding service of expert reports.	0.40	\$350.00
07/07/25	AMUE	Communications to B. Weisenberg regarding fees (.2); communications with J. Prol regarding meeting (.4).	0.60	\$630.00
07/08/25	MDL	Email exchange with J. Hogan and M. Hogan regarding unknown abuse claims reserve amount.	0.10	\$87.50
07/09/25	MCM	Email correspondence with Committee counsel regarding deadlines and related issues.	0.30	\$277.50
07/10/25	MDL	Meeting with M. Kaplan regarding discovery schedule and expert depositions.	0.80	\$700.00
07/14/25	MDL	Email exchange with B. Weisenberg (Lowenstein) regarding fee statement objection meet and confer.	0.10	\$87.50
07/14/25	MDL	Telephone conference with M. Kaplan regarding revisions to expert discovery deadlines.	0.30	\$262.50
07/14/25	MDL	Email exchange with M. Kaplan regarding changes to discovery deadlines.	0.20	\$175.00
07/16/25	MDL	Email exchange with M. Kaplan regarding expert deposition schedule.	0.10	\$87.50
07/18/25	MDL	Email exchange with M. Kaplan and B. Weisenberg (both of Lowenstein) regarding case schedule options depending on motion to continuance outcome.	0.10	\$87.50
07/18/25	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding case schedule options depending on motion to continuance outcome.	0.10	\$87.50
07/21/25	AMUE	Communication with M. Kaplan regarding scheduling matters.	0.30	\$315.00
07/23/25	MDL	Telephone conference with M. Kaplan and J. Prol (both of Lowenstein) and A. Uetz to discuss go-forward schedule in main case and remaining adversary proceeding.	0.80	\$700.00

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07/24/25	EPK	Review email correspondence with O. Rosaluk of DLA Piper regarding changes to the plan confirmation schedule.	0.10	\$87.50
07/24/25	MCM	Email correspondence with Committee counsel regarding various issues, including scheduling and continuance of confirmation hearing.	0.40	\$370.00
07/25/25	MDL	Email exchange with B. Weisenberg (Lowenstein) regarding proposed order granting motion for continuance.	0.30	\$262.50
07/28/25	MCM	Review email correspondence and request for abuse claims from Committee counsel, who had previous unabridged access to abuse claims (.3); correspondence with counsel regarding same (.3); correspondence with claims and noticing agent requesting update (.2).	0.80	\$740.00
07/29/25	MCM	Follow-up correspondence authorizing Committee professionals to receive abuse claims again that they already received, accessed, and reviewed (.4); correspondence regarding meet-and-confer with Committee professionals as requested on 7/26 (.2).	0.60	\$555.00
07/30/25	MCM	Follow up on analysis of prior productions of abuse-claim information to Committee and review of same by Committee professionals.	0.40	\$370.00
07/31/25	AMUE	Meet and confer with Committee regarding remaining adversary proceeding scheduling order and related matters (.8); follow up from same (.2).	1.00	\$1,050.00
07/31/25	MCM	Attention to issues concerning information requests from Committee.	0.40	\$370.00
07/31/25	MDL	Telephone conference with Lowenstein (J. Prol, M. Kaplan) regarding meet and confer on privilege log issues, confidentiality designations, motion in limine on First Amendment issues, and adversary proceeding schedule.	0.80	\$700.00

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07/31/25	MDL	Email correspondence to Committee counsel (Lowenstein) regarding privilege log issues, confidentiality designations, motion in limine on First Amendment issues, and adversary proceeding schedule.	0.20	\$175.00
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Task Total:	9.70	\$9,052.50
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027 Real Estate and Real Property Issues

07/17/25	SJM	Attend meeting regarding privileged real estate issue.	1.10	\$962.50
07/22/25	SJM	Provide advice to client leadership and real estate consultants regarding utilization of certain assets in support of plan confirmation.	1.00	\$875.00

Task Total:	2.10	\$1,837.50
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028 Tort Claims

07/18/25	KAFA	Summarize state litigation and claim information for two claimants per M. Moore request.	1.20	\$540.00
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Task Total:	1.20	\$540.00
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031 Insurance Issues (coverage, includes adversary proceeding)

07/01/25	ERR	Review notice by Westport and review potential effect on case.	0.50	\$550.00
07/01/25	MCM	Attention to issues concerning replacement by Clyde of Cozen as counsel for Fidelidade.	0.20	\$185.00
07/02/25	ERR	Review order regarding status of case.	0.40	\$440.00
07/02/25	ERR	Review privileged issues related to insurance matter.	0.40	\$440.00
07/07/25	AMUE	Analyze insurance settlement issues.	0.80	\$840.00
07/07/25	EPM	Review status of document discovery in insurance adversary.	0.20	\$168.00

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07/07/25	MCM	Correspondence regarding adversary proceeding in insurance matter (.3); analyze internal correspondence regarding strategy on adversary proceeding (.4).	0.70	\$647.50
07/07/25	MR	Review prior discovery-related correspondence from insurer defendant in insurance coverage action, in relation to privileged strategy matters.	0.80	\$636.00
07/08/25	AMUE	Analyze insurance settlement issue (.9) and meeting with M. Lee and E. Ridley regarding same (.7).	1.60	\$1,680.00
07/08/25	ERR	Review strategy regarding potential settlement negotiations with Committee and insurers (.7) and review basis for settlement demands and responses (including coverage defenses) (1.1).	1.80	\$1,980.00
07/08/25	MDL	Strategize with Foley team regarding confidential mediation subject.	0.60	\$525.00
07/08/25	MR	Review documents produced by insurer defendants in insurance coverage action.	1.30	\$1,033.50
07/09/25	EPM	Analysis of discovery deficiency letter from Pacific entities (.4); call with M. Roberts regarding insurer document productions (.5); call with E. Ridley regarding insurance discovery status (.4); preparation for same (.2); draft summary of status of insurance discovery (.9).	2.40	\$2,016.00
07/09/25	ERR	Telephone call with T. Gallagher and A. Uetz regarding status of settlement discussions in case.	0.50	\$550.00
07/09/25	ERR	Review status of discovery and strategy regarding preparation of status report per court order in insurance recovery case.	0.60	\$660.00
07/09/25	MDL	Email exchange with J. Bonteque regarding non-abuse litigation claims-related insurance policies.	0.10	\$87.50
07/09/25	MR	Review documents produced by insurers in insurance coverage action (1.2); telephone and email communications with E. Mazzocco regarding confidential strategy matters related to discovery in insurance coverage action (.5).	1.70	\$1,351.50

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07/09/25	SJM	Analyze email and related documents from insurance broker regarding new insurance premium finance agreement and need for order approving same (.8); email to broker requesting additional information (.4).	1.20	\$1,050.00
07/10/25	AMUE	Analyze open issues regarding discovery relating to insurers.	0.90	\$945.00
07/10/25	JCH	Prepare drafts of application to shorten time, declarations in support, proposed orders and notice of hearing related to the third motion to approve the insurance finance agreement.	0.80	\$264.00
07/10/25	SJM	Email to Committee counsel and U.S. Trustee regarding shortening notice on premium finance motion.	0.30	\$262.50
07/10/25	SJM	Analyze issue related to insurance renewal (.7); email to J. Harrison regarding preparation of insurance premium finance motion (.5); draft motion to approve insurance finance agreement and related documents (3.6); email to A. Bardos regarding same (.2).	5.00	\$4,375.00
07/11/25	ERR	Telephone call with T. Gallagher regarding status of settlement discussions.	0.30	\$330.00
07/11/25	JCH	Finalize (.6) and file (.2) third motion to approve insurance finance agreement, application to shorten time, declarations in support, proposed orders and notice of hearing regarding same.	0.80	\$264.00
07/11/25	MDL	Telephone conference with J. Bonteque (Duane Morris) regarding proposed language in confirmation order regarding general liability insurance ride-through.	0.50	\$437.50
07/11/25	MDL	Analyze proposed language in confirmation order regarding general liability insurance ride-through sent by J. Bonteque.	0.10	\$87.50
07/11/25	SJM	Call with A. Bardos regarding motion to approve insurance finance agreement (.2); finalize motion papers (1.1); supervise filing of same (.2).	1.50	\$1,312.50

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07/14/25	ERAS	Call with M. Roberts, E. Mazzocco, A. Witz, and E. Jones regarding strategy for review of insurer's document production (.5); review insurer's document production for responsiveness to RCBO's discovery requests (.7).	1.20	\$660.00
07/14/25	ERR	Review Westport communication regarding status of discovery.	0.50	\$550.00
07/14/25	MR	Review documents produced by insurer defendants in insurance coverage action, in furtherance of devising strategy regarding privileged matters in relation to document discovery.	1.90	\$1,510.50
07/15/25	EGJ	Complete document review (.8); confer with M. Roberts regarding insurer production review (.4); analyze insurer productions to determine deficiencies (1.3).	2.50	\$1,625.00
07/15/25	EPM	Call with M. Roberts regarding case status and tasks (.3); review prior correspondence with Westport regarding discovery (.3); draft discovery status update (.6).	1.20	\$1,008.00
07/15/25	ERAS	Review Chubb entities' document production for responsiveness to RCBO's discovery requests.	1.20	\$660.00
07/15/25	MR	Attend strategy call regarding privilege discovery matters for insurance coverage action with E. Mazzocco, E. Asfora, E. Jones and A. Witz (.4); follow-up email communications with analysis and direction regarding same privileged, discovery-related matters (.5).	0.90	\$715.50
07/16/25	EGJ	Analyze CNA production to discern deficiencies.	0.90	\$585.00
07/16/25	EPM	Schedule internal meeting regarding status of insurance discovery (.2); call with M. Thomas regarding forthcoming document productions in insurance case (.3).	0.50	\$420.00
07/16/25	ERR	Review results of bankruptcy hearing and issues regarding assignment terms.	0.70	\$770.00

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07/16/25	MR	Analyze documents produced by insurer defendants in insurance coverage action (1.3); review discovery-related correspondence received from insurer defendants and analyze privileged strategy considerations in relation to same for insurance coverage action (.6).	1.90	\$1,510.50
07/17/25	EGJ	Confer with M. Roberts and E. Mazzocco regarding insurer review (.4); analyze documents produced by insurers to discern deficiencies (2.6).	3.00	\$1,950.00
07/17/25	EPK	Review email correspondence from counsel for RCWC, B. Neville of Murphy Pearson, regarding insurance coverage issues.	0.10	\$87.50
07/17/25	EPM	Review insurance discovery status (1.1); call with A. Uetz, E. Ridley, M. Roberts, and M. Lee regarding status of insurance discovery (1.0); call with M. Roberts, E. Jones, E. Asfora, and A. Witz regarding status of document review (.4).	2.50	\$2,100.00
07/17/25	ERAS	Review Chubb entities' document production for responsiveness to RCBO's discovery requests. (1.0); call with E. Mazzocco, M. Roberts, E. Jones and A. Witz regarding content of insurers' documents (.4).	1.40	\$770.00
07/17/25	ERR	Review status of discovery and response to insurers given court order regarding status report.	1.40	\$1,540.00
07/17/25	MDL	Telephone conference with S. Warren and T. Schiavoni (both of O'Melveny) regarding possible continuance of confirmation hearing and lift stay issues.	0.80	\$700.00
07/17/25	MR	Attend strategy call with A. Uetz, E. Ridley, M. Lee and E. Mazzocco regarding privileged strategy matters regarding insurance coverage action (.9); follow-up email communications in relation to same (.4); attend teleconference with E. Jones, A. Witz, A. Asfora and E. Mazzocco regarding review of insurer defendants' document productions in insurance coverage action (.3); email communications regarding review team questions in relation to same (.3).	1.90	\$1,510.50
07/18/25	EGJ	Complete insurer production review.	0.30	\$195.00
07/18/25	ERAS	Review Chubb entities' document production for responsiveness to RCBO's discovery requests.	1.20	\$660.00

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07/18/25	ERR	Review status of confirmation trial in relation to insurance claims.	0.30	\$330.00
07/18/25	MR	Respond to questions raised by document review team in insurance coverage action (.4); review prior discovery-related materials in preparation for drafting joint status report ordered by Judge Corley in insurance coverage action (.6.).	1.00	\$795.00
07/19/25	MR	Draft joint status report ordered by Judge Corley in insurance coverage action.	0.80	\$636.00
07/20/25	ERAS	Review Travelers document production for responsiveness to RCBO's discovery requests.	1.10	\$605.00
07/21/25	AMUE	Analyze derivative standing issue regarding Committee.	1.10	\$1,155.00
07/21/25	AMUE	Analyze privileged issue regarding insurance coverage for state court cases.	1.60	\$1,680.00
07/21/25	EPM	Draft response to Westport discovery deficiency letter (1.2); conduct analysis of insurer responses to tender letters for various claims (.6).	1.80	\$1,512.00
07/21/25	ERAS	Review Travelers' document production for responsiveness to RCBO's discovery requests.	1.40	\$770.00
07/21/25	ERR	Telephone call with T. Gallagher regarding status of settlement discussions with insurers.	0.40	\$440.00
07/21/25	MR	Draft discovery-related correspondence to insurer defendants in insurance coverage action detailing positions on various document-production-related issues raised by insurers, including review of prior document productions, written discovery and meet-and-confer correspondence.	3.40	\$2,703.00
07/22/25	EPM	Coordinate production of documents to American Home (.5); review documents for potential production and draft summary of recommendations (.8).	1.30	\$1,092.00
07/22/25	ERR	Telephone call with T. Gallagher regarding status of settlement discussions with insurers.	0.50	\$550.00
07/22/25	KAFA	Preparation of documents to be produced to AHA.	0.50	\$225.00
07/22/25	MDL	Telephone conference with T. Schiavoni (O'Melveny Myers) regarding lift stay issues and adversary proceeding discovery.	0.90	\$787.50

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07/22/25	MR	Continue drafting discovery-related correspondence to insurer defendants in insurance coverage action detailing positions on various document-production-related issues raised by insurers (3.1); coordinate production of documents to American Home in insurance coverage action (.3).	3.40	\$2,703.00
07/22/25	SJM	Respond to broker regarding status of approval of insurance premium finance agreement.	0.20	\$175.00
07/23/25	AMUE	Analyze issues regarding production of documents to insurers (1.2); revisions to draft communication to insurers regarding same (.5); provide advice regarding Court update (.6).	2.30	\$2,415.00
07/23/25	EPM	Analyze documents subject to production (4.6); coordinate document production to insurers (1.5).	6.10	\$5,124.00
07/23/25	JCH	Email updated list of insurer counsel to E. Mazzocco.	0.20	\$66.00
07/23/25	KAFA	Communications with M. Schachte regarding documents to be produced to AHA (.3); update document production log (.2).	0.50	\$225.00
07/23/25	MR	Complete initial drafts of discovery-related correspondence to insurer defendants in insurance coverage action, including further review of prior document productions and discovery-related materials/correspondence (2.9); further email communications relating to production of documents to American Home in insurance coverage action (.2).	3.10	\$2,464.50
07/24/25	EPM	Draft response to correspondence from Westport regarding discovery.	6.40	\$5,376.00
07/24/25	MDL	Revise letter to Clyde & Co. responding to assertions of discovery deficiencies.	0.40	\$350.00
07/24/25	MR	Revise discovery-related correspondence to insurer defendants in insurance coverage action detailing positions on various document-production-related issues raised by insurers (1.2); continue drafting joint status update ordered by Judge Corley in insurance coverage action (.4).	1.60	\$1,272.00
07/25/25	AMUE	Confer with M. Lee to discuss strategy in light of his meeting with counsel for Chubb.	0.60	\$630.00

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07/25/25	AMUE	Review email from M. Plevin and discuss with Foley team.	0.40	\$420.00
07/25/25	EPM	Complete draft letter to Westport regarding discovery (7.9); call with M. Moore, A. Uetz, M. Lee, E. Ridley, and S. Moses regarding discussions with insurers regarding discovery and mediation (.6).	8.50	\$7,140.00
07/25/25	ERR	Edit letter to Westport regarding status of productions between the parties.	0.80	\$880.00
07/25/25	ERR	Edit letter to Pacific regarding status of productions between the parties.	0.80	\$880.00
07/25/25	ERR	Review status of lift stay motion and issues regarding discovery status with insurer litigation and report to court.	0.60	\$660.00
07/25/25	MCM	Conference call with Foley team regarding insurance matters.	0.50	\$462.50
07/25/25	MDL	Strategize with Foley team regarding adversary proceeding vs. insurers including discovery positions and potential resolutions of coverage.	0.60	\$525.00
07/25/25	MR	Revise discovery-related letters to insurers in insurance coverage action (2.6); provide comments on additional discovery-related correspondence to insurers (.6); continue drafting joint status update ordered by Judge Corley (.5); teleconference with counsel for Pacific Insurers regarding discovery and document production matters (.9).	4.60	\$3,657.00
07/25/25	SJM	Attend Foley team call regarding status of discussions with insurers.	0.50	\$437.50
07/27/25	MR	Revise draft of joint status update ordered by Judge Corley in insurance coverage action.	1.40	\$1,113.00
07/27/25	SJM	Emails to client and insurance broker regarding entered order approving insurance premium finance agreement.	0.30	\$262.50
07/28/25	AMUE	Analyze insurance coverage for state court cases (.8); analyze possible settlements with insurers (.7).	1.50	\$1,575.00

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07/28/25	EPM	Calls with counsel for insurers regarding draft joint status report (.7); revise draft joint status report (.5).	1.20	\$1,008.00
07/28/25	ERR	Edit joint status report to court per order.	1.20	\$1,320.00
07/28/25	MDL	Analyze draft status report with insurer comments.	0.40	\$350.00
07/28/25	MR	Draft further revisions to joint status update ordered by Judge Corley in response to edits received from other parties to insurance coverage action.	0.60	\$477.00
07/28/25	SJM	Analyze approach to issues with approval of premium finance agreement raised by lender (.6); multiple emails with lender and broker regarding same (.5).	1.10	\$962.50
07/29/25	EPM	Revise draft joint status report.	6.50	\$5,460.00
07/29/25	ERR	Review edits to joint status report and provide comments regarding finalization.	2.00	\$2,200.00
07/29/25	JCH	Finalize (.4) and file (.1) joint status update in District Court case.	0.50	\$165.00
07/29/25	KAFA	Update document production log.	0.20	\$90.00
07/29/25	MDL	Revise joint status report in adversary proceeding.	0.10	\$87.50
07/29/25	MDL	Email exchange with N. Kuenzi (Burns Bair) regarding revisions to joint status report.	0.10	\$87.50
07/29/25	MDL	Analyze Committee's proposed revisions to status report.	0.30	\$262.50
07/29/25	MR	Draft final set of revisions to joint status update ordered by Judge Corley in advance of filing and in response to edits by other parties to insurance coverage action.	0.60	\$477.00
07/29/25	SJM	Multiple emails to insurance broker and premium finance lender regarding order on premium finance motion (.4); call with lender regarding order provisions (.4); follow-up emails to lender and broker regarding insurance funding (.2).	1.00	\$875.00
07/30/25	ERR	Telephone call with T. Gallagher regarding issues raised in settlement discussions with insurers.	0.70	\$770.00
07/30/25	ERR	Review Westport letter to Judge Lafferty.	0.30	\$330.00

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07/30/25	MDL	Strategize with E. Ridley regarding confidential litigation issue.	0.50	\$437.50
07/30/25	MDL	Email exchange with J. Bonteque (Duane Morris) regarding proposed language for confirmation order relating to non-abuse litigation insurance.	0.10	\$87.50
07/30/25	MDL	Analyze proposed language for confirmation order relating to non-abuse litigation insurance.	0.20	\$175.00
Task Total:			131.00	\$110,361.00

032 Rule 2004 Motions/Discovery/Subpoenas

07/01/25	EPM	Manage review of document production regarding privileged issue.	0.50	\$420.00
07/01/25	MRL	Review email correspondence with the Foley team regarding deposition transcripts.	0.10	\$67.50
07/02/25	EGJ	Review document production regarding privileged issue.	1.10	\$715.00
07/02/25	ERAS	Review RCBO's document production for privileged issue.	1.60	\$880.00
07/02/25	JMT	Confer with team on privilege log and confidentiality designations for depositions.	0.70	\$612.50
07/02/25	MDL	Evaluate document production review status regarding privileged issue.	0.30	\$262.50
07/03/25	EGJ	Analyze documents from production (.3); confer with E. Asfora regarding same (.2).	0.50	\$325.00
07/03/25	ERAS	Review RCBO's document production for privileged issue.	3.50	\$1,925.00
07/06/25	ERAS	Review RCBO's document production for privileged issue.	1.50	\$825.00
07/07/25	EGJ	Confer with E. Mazzocco regarding coding (.2); code documents from production (1.3).	1.50	\$975.00
07/07/25	EPM	Review status of document review regarding privileged issue.	0.60	\$504.00
07/07/25	SJM	Review A. Bardos deposition transcripts for confidentiality designations (2.7); prepare letter regarding designations (.4).	3.10	\$2,712.50

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07/07/25	SJM	Respond to insurer counsel regarding July 10 deposition.	0.20	\$175.00
07/07/25	SJM	Finalize errata sheets for D Flanagan and L. Oberempt depositions.	0.40	\$350.00
07/07/25	SJM	Email correspondence with J. Harrison and court reporting service regarding transcripts for depositions.	0.40	\$350.00
07/08/25	EPM	Telephone and email discussions regarding status of document review (.5); telephone call with M. Schachte regarding adjustments to review protocol (.4).	0.90	\$756.00
07/08/25	ERAS	Review RCBO's document production for privileged issue.	0.50	\$275.00
07/08/25	JCH	Send exhibits from Gies deposition to RCC counsel.	0.50	\$165.00
07/08/25	MDL	Email exchange with Lowenstein attorneys regarding access to properties for inspection.	0.20	\$175.00
07/08/25	MR	Locate information and documents requested by A. Uetz and M. Lee, in furtherance of preparation for upcoming hearings in Chapter 11 proceedings.	0.60	\$477.00
07/08/25	MRL	Review email correspondence from the Foley team regarding the Committee's produced documents (.3); analyze documents regarding the same (.2).	0.50	\$337.50
07/08/25	SJM	Respond to email from M. Lee regarding ruling on Committee motion for protective order.	0.40	\$350.00
07/08/25	SJM	Send letter to Committee counsel regarding highly confidential designations in connection with Bishop Barber's deposition.	0.20	\$175.00
07/08/25	SJM	Emails with counsel for RCC and RCWC regarding deposition transcripts.	0.30	\$262.50
07/09/25	AAWT	Emails and coordination with attorney team regarding document review assignment.	0.20	\$105.00
07/09/25	EGJ	Analyze documents from production.	1.50	\$975.00
07/09/25	EPM	Call with E. Jones and E. Asfora regarding protocol for privileged document review.	0.30	\$252.00

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07/09/25	ERAS	Review RCBO's document production for privileged issue.	2.80	\$1,540.00
07/09/25	JCH	Pull documents from Relativity for M. Lee for deposition prep.	0.50	\$165.00
07/09/25	MCM	Continued review of Committee production and email correspondence regarding same.	0.30	\$277.50
07/09/25	SJM	Assist with preparation for deposition of Committee designee.	1.40	\$1,225.00
07/10/25	EGJ	Analyze documents from production.	0.40	\$260.00
07/10/25	EPM	Analysis of privileged document review status and results (.6); draft summary regarding same (.7).	1.30	\$1,092.00
07/10/25	SJM	Assist with preparation for deposition of Committee representative (1.6); attend deposition of Committee representative remotely (for part) (1.1); email to insurers regarding remote attendance at deposition (.3).	3.00	\$2,625.00
07/11/25	EPM	Revise summary of document review status and results.	1.50	\$1,260.00
07/13/25	ERAS	Review RCBO's document production for privileged issue.	0.40	\$220.00
07/14/25	EGJ	Analyze documents.	1.00	\$650.00
07/14/25	JMT	Confer with team on discovery and plan confirmation issues.	0.50	\$437.50
07/14/25	KAFA	Analysis of documents received from client.	0.50	\$225.00
07/14/25	MDL	Evaluate list of documents demanded by Committee.	0.30	\$262.50
07/14/25	MRL	Call with M. Mitcham, M. Thomas, and M. Moore regarding status of case on discovery process.	0.50	\$337.50
07/15/25	AAWT	Review internal documents in preparation for call with attorney team regarding document review project.	0.20	\$105.00
07/15/25	JMT	Search for and prepare an index of documents produced related to privileged matter.	1.10	\$962.50

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07/15/25	MDL	Email exchange with B. Weisenberg (Lowenstein) regarding Committee supplemental document request.	0.10	\$87.50
07/15/25	MDL	Telephone conference with A. Uetz regarding collection of documents for Committee supplemental document request.	0.10	\$87.50
07/15/25	MDL	Confer with S. Moses regarding collection of documents for Committee's supplemental document request.	0.30	\$262.50
07/15/25	MRL	Email correspondence with M. Roberts regarding the privilege log of documents sent to the committee.	0.20	\$135.00
07/15/25	SJM	Review past productions in connection with Committee demand for production regarding certain employment allegations (1.8); emails with case team regarding same (.6); email to R. Medeiros and A. Bardos regarding same (.3).	2.70	\$2,362.50
07/16/25	AAWT	Review produced documents to assess scope of production and contemporaneously update tracking document.	0.30	\$157.50
07/16/25	MDL	Email exchange with A. Bardos and R. Medeiros regarding supplemental production of documents on privileged and confidential issue.	0.20	\$175.00
07/16/25	MRL	Email correspondence with M. Lee regarding the Committee's letter to produce further documents (.1); analyze the Committee's letter (.2).	0.30	\$202.50
07/17/25	AAWT	Review produced documents to assess scope of production and contemporaneously update tracking document.	4.40	\$2,310.00
07/17/25	AMUE	Meeting with M. Lee regarding document production issue (.5) and review information regarding privileged document issue (.5).	1.00	\$1,050.00
07/17/25	AMUE	Meeting with Foley team regarding privileged issue concerning document production.	1.00	\$1,050.00
07/17/25	MDL	Telephone conference with S. Moses regarding supplemental document production.	0.20	\$175.00

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07/17/25	MDL	Detailed email correspondence with B. Weisenberg (Lowenstein) regarding supplemental document production per Committee supplemental requests.	1.50	\$1,312.50
07/17/25	MDL	Telephone conference with A. Uetz and M. Kemner regarding supplemental production issue and continuance issue (partial).	0.80	\$700.00
07/17/25	MRL	Call with the Diocese and Foley teams to discuss the Committee's supplemental discovery requests (.5); analyze documents for production to the Committee's requests (.7); review email correspondence from the Foley team regarding collecting certain documents to comply with the Committee's requests (.3).	1.50	\$1,012.50
07/17/25	SJM	Call with M. Lee, R. Medeiros, and M. Rofaail regarding further document search (.5); emails regarding review of clergy file (.4); preliminary review of clergy file (.8); call with M. Lee regarding same (.3).	2.00	\$1,750.00
07/18/25	AAWT	Review produced documents to assess scope of production and contemporaneously update tracking document.	1.80	\$945.00
07/18/25	MDL	Evaluate redaction issue.	0.20	\$175.00
07/21/25	AAWT	Review produced documents to assess scope of production and contemporaneously update tracking document.	1.40	\$735.00
07/21/25	AAWT	Edit report on documents reviewed to date.	0.50	\$262.50
07/21/25	EPM	Conduct quality control revision of redactions of produced information.	2.70	\$2,268.00
07/22/25	EPM	Complete quality control revision of redactions in connection with document production (1.2); draft cover letter regarding production (1.1).	2.30	\$1,932.00
07/22/25	KAFA	Preparation of documents to be produced to Committee.	0.60	\$270.00
07/22/25	MDL	Analyze documents responsive to Committee's supplemental discovery request.	0.30	\$262.50

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07/22/25	MRL	Email correspondence with M. Lee regarding reviewing certain documents for CCSS (.3); analyze documents regarding bylaws for CCSS (.2).	0.50	\$337.50
07/23/25	JMT	Confer with E. Mazzocco regarding production and document review issues.	0.60	\$525.00
07/23/25	KAFA	Review document production email and update document production log.	0.30	\$135.00
07/23/25	MDL	Email correspondence with R. Chahil (Lowenstein) regarding privileged issue and supplemental expert-related document production.	0.30	\$262.50
07/23/25	MDL	Evaluate status of document collection for Committee's supplemental document requests.	0.30	\$262.50
07/23/25	MDL	Evaluate production of documents to Committee in response to supplemental document requests.	1.40	\$1,225.00
07/24/25	KAFA	Prepare summary of documents to prepare for production to Committee (.6); communications with M. Schachte and M. Lee regarding documents to be produced to Committee (.9).	1.50	\$675.00
07/24/25	MDL	Evaluate pending document productions for confidentiality, privilege, responsiveness, and completeness.	0.90	\$787.50
07/25/25	MDL	Evaluate forthcoming document production.	0.20	\$175.00
07/28/25	MDL	Analyze email from M. Kaplan (Lowenstein) regarding meet and confer topics.	0.10	\$87.50
07/28/25	MRL	Review email correspondence from the Committee's counsel regarding certain discovery documents.	0.20	\$135.00
07/28/25	TND	Begin research on privileged discovery matter.	1.90	\$1,520.00
07/29/25	MDL	Email correspondence to M. Kaplan (Lowenstein) regarding meet and confer over Committee's recent discovery demands.	0.10	\$87.50
07/29/25	MDL	Evaluate specific documents for privilege and responsiveness to Committee's latest supplemental document demand.	0.20	\$175.00
07/29/25	TND	Further research on privileged discovery matter (.9); begin drafting memo regarding same (.6).	1.50	\$1,200.00

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07/30/25	KAFA	Prepare client documents for production to Committee.	1.60	\$720.00
07/30/25	MDL	Strategize with S. Moses regarding deposition transcript designations.	0.30	\$262.50
07/30/25	MDL	Provide instruction to K. Farrar and M. Bevan regarding discovery to be produced to Committee and confidentiality designations for same.	0.20	\$175.00
07/30/25	MDL	Final-level review of documents to be produced in response to Committee's supplemental requests.	0.50	\$437.50
07/30/25	MRL	Review email correspondence from M. Lee regarding reviewing certain documents to produce to the Committee.	0.20	\$135.00
07/30/25	SJM	Call with M. Lee regarding Committee's supplemental document requests.	0.30	\$262.50
07/30/25	TND	Further drafting of memo on privileged issue (1.7); update memo to include revisions from M. Lee (.2).	1.90	\$1,520.00
07/31/25	MDL	Evaluate Committee letter regarding discovery issues such as privilege log descriptions and confidentiality designations and potential responses to same.	1.50	\$1,312.50
07/31/25	SJM	Call with M. Lee regarding Committee meet and confer issues in preparation for meet and confer call.	0.30	\$262.50
Task Total:			81.00	\$59,406.00

034 Other Motion Practice

07/11/25	TND	Revise motion to dismiss to add additional facts and recent events.	2.60	\$2,080.00
07/14/25	MWBE	Attention to research on judicial authority over proceedings per S. Moses.	1.60	\$960.00
07/14/25	SJM	Work on opposition to Committee motion to shorten time for hearing.	1.40	\$1,225.00
07/17/25	MWBE	Follow up with team regarding hearing status.	0.10	\$60.00

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07/28/25	MRL	Draft the Debtor's fifth motion to extend removal deadlines (1.5); draft the declaration in support of the Debtor's fifth motion to extend removal deadlines (.5).	2.00	\$1,350.00
07/28/25	MWBE	Discuss upcoming assignment with S. Moses.	0.10	\$60.00
07/28/25	SJM	Email to M. Rofaeil regarding renewed motion to extend removal deadline (.3); multiple emails to M. Berg regarding motion to extend time to assume or reject cathedral lease (.6); respond to E. Khatchatourian regarding timing for motions (.2).	1.10	\$962.50
07/29/25	MRL	Draft the Debtor's fifth motion to extend removal deadlines (.5); draft the declaration in support of the Debtor's fifth motion to extend removal deadlines (.7); draft the notice of hearing on the Debtor's fifth motion to extend removal deadlines (.4).	1.60	\$1,080.00
07/29/25	MWBE	Follow up with S. Moses regarding motion regarding lease.	0.30	\$180.00
07/30/25	EPK	Follow up on the status of the next iteration of the removal deadline extension motion.	0.10	\$87.50
Task Total:			10.90	\$8,045.00

035 General Counsel Matters

07/02/25	LFG	Analysis of policies and communications with client regarding same.	1.20	\$1,440.00
07/08/25	LFG	Communications with R. Medeiros.	0.20	\$240.00
07/09/25	LFG	Calls with R. Medeiros regarding updates to policy (.4); work on same (1.0); communications with clients (.3).	1.70	\$2,040.00
07/10/25	LFG	Finalize bylaws and policy documents for R. Medeiros.	0.30	\$360.00
07/19/25	LPM	Prepare final versions of MDBR policy and bylaws.	0.40	\$326.00
07/21/25	KAFA	Update MDRB Collaborate site per R. Medeiros' request.	0.80	\$360.00

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07/30/25	KAFA	Update MDRB Collaborate site per R. Medeiros' request.	0.30	\$135.00
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Task Total:	4.90	\$4,901.00
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038 Mediation

07/07/25	MDL	Analyze plan of reorganization to identify potential points of negotiation with Committee and insurers.	1.80	\$1,575.00
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07/09/25	AMUE	Meeting with T. Gallagher regarding insurance settlement issues.	0.60	\$630.00
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07/30/25	MDL	Telephone conference with T. Gallagher and E. Ridley regarding confidential mediation issues.	0.30	\$262.50
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Task Total:	2.70	\$2,467.50
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Services Total:	619.60	\$521,418.50
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Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Alexander A. Witz	AAWT	Associate	8.80	\$525.00	\$4,620.00
Emily G. Jones	EGJ	Associate	12.70	\$650.00	\$8,255.00
Eloise R. Asfora	ERAS	Associate	17.80	\$550.00	\$9,790.00
Joseph S. Harper	JSH	Associate	0.40	\$800.00	\$320.00
Mason Roberts	MR	Associate	35.50	\$795.00	\$28,222.50
Mary Rofaeil	MRL	Associate	40.20	\$675.00	\$27,135.00
Mikaela R. Mitcham	MRM	Associate	1.50	\$675.00	\$1,012.50
Michael W. Berg	MWBE	Associate	4.30	\$600.00	\$2,580.00
Nora McGuffey	NMCG	Associate	2.90	\$700.00	\$2,030.00
Alissa M. Nann	AMN	Of Counsel	7.10	\$1,050.00	\$7,455.00
Shane J. Moses	SJM	Of Counsel	100.00	\$875.00	\$87,500.00
Janelle C. Harrison	JCH	Paralegal	22.20	\$330.00	\$7,326.00
Kerry A. Farrar	KAFA	Paralegal	8.00	\$450.00	\$3,600.00
Ann Marie Uetz	AMUE	Partner	83.00	\$1,050.00	\$87,150.00
Emil P. Khatchatourian	EPK	Partner	9.30	\$875.00	\$8,137.50
Eileen R. Ridley	ERR	Partner	16.60	\$1,100.00	\$18,260.00
Felicia S. O'Connor	FOC	Partner	1.30	\$850.00	\$1,105.00

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August 31, 2025

Geoffrey S. Goodman	GSG	Partner	4.60	\$1,050.00	\$4,830.00
Jonathan Michael Thomas	JMT	Partner	3.70	\$875.00	\$3,237.50
Lisa F. Glahn	LFG	Partner	3.40	\$1,200.00	\$4,080.00
Mark C. Moore	MCM	Partner	46.10	\$925.00	\$42,642.50
Matthew D. Lee	MDL	Partner	79.10	\$875.00	\$69,212.50
Thomas F. Carlucci	TFCA	Partner	3.10	\$1,375.00	\$4,262.50
Alan R. Ouellette	AROU	Senior Counsel	3.00	\$875.00	\$2,625.00
Elizabeth P. Mazzocco	EPM	Senior Counsel	50.60	\$840.00	\$42,504.00
Laura P. Mikeworth	LPM	Senior Counsel	0.40	\$815.00	\$326.00
Tamar N. Dolcourt	TND	Special Counsel	54.00	\$800.00	\$43,200.00
Totals			619.60		\$521,418.50

Expenses Incurred

Description	Amount
Depositions / Transcripts, Exams	\$5,518.03
Document Retrieval	\$182.31
Electronic Legal Research Services	\$828.31
LSS - eDiscovery Services	\$11,300.00
Other Expenses	\$26.53
Expenses Incurred Total	\$17,855.18

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

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August 31, 2025

Expense Detail**Depositions / Transcripts, Exams**

Date	Initials	Description	Amount
06/17/25	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Transcript Of: Attila Bardos - 06/17/25.	\$1,639.72
06/17/25	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Transcript Of: Daniel Flanagan - 06/17/25.	\$2,757.41
07/07/25	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Transcript of: Ronald Gies - 07/07/25.	\$1,120.90
			<hr/> \$5,518.03

Document Retrieval

Date	Initials	Description	Amount
07/31/25	JRBL	DESOTO CAB CO. INC. - Pick up documents at RCBO - 07/31/25.	\$182.31

Electronic Legal Research Services

Date	Initials	Description	Amount
07/31/25	MWBE	Westlaw. Docket Report. Image38-0. US TREATISES DOC ACCESS. Case Summary. Image2123-0.	\$828.31

LSS - eDiscovery Services

Date	Initials	Description	Amount
07/31/25	JRBL	LSS - eDiscovery Services.	\$11,300.00

Other Expenses

Date	Initials	Description	Amount
07/31/25	JRBL	Epiq Global Business Transformation Solutions LLC - Epiq OT expenses for July 2025 - San Fran - 07/31/25.	\$26.53

Expense Total:	<hr/> \$17,855.18
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FOLEY & LARDNER LLP
111 HUNTINGTON AVENUE
SUITE 2600
BOSTON, MASSACHUSETTS 02199-7610
TELEPHONE (617) 342-4000
FACSIMILE (617) 342-4001
WWW.FOLEY.COM

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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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

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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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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

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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

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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

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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

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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

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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

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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

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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

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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

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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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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

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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
			<hr/> \$80.00

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