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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 FIRST INTERIM FEE
 APPLICATION OF HILCO REAL ESTATE,
 LLC AS REAL ESTATE CONSULTANT
 FOR ALLOWANCE AND PAYMENT OF
 COMPENSATION FOR THE PERIOD OF
 JANUARY 21, 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:	Hilco Real Estate, LLC
Name of Client:	The Roman Catholic Bishop of Oakland
Time Period covered by this application:	January 21, 2025—August 31, 2025
Total compensation sought this period:	\$261,333.00
Total expenses sought this period:	\$12,379.24
Petition date:	May 8, 2023
Retention date:	January 21, 2025
Date of order approving employment:	March 18, 2025 [Docket No. 1836]
Total fees approved by interim order to date:	\$0.00
Total expenses approved by interim order to date:	\$0.00
Total allowed fees paid to date:	\$0.00
Total allowed expenses paid to date:	\$0.00
Blended rate in this application for all attorneys:	N/A
Blended rate in this application for all timekeepers:	\$643.00
Fees sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$73,726.40
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$5,857.00
Number of professionals included in this application:	5
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals billing fewer than 15 hours to the case during this period:	2
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:	N/A
Interim or Final:	Interim

SUMMARY OF MONTHLY FEE STATEMENTS FOR THE INTERIM FEE PERIOD

Date Filed	Period Covered	80% of Fees Requested	Total Fees Incurred	Expenses Requested	Fees Approved	Expenses Approved	Amount Received	20% Holdback Requested
3/28/25 [Dkt. 1850]	1/21/25 to 2/28/25	\$73,726.40	\$92,158.00	\$5,857.00	\$73,726.40	\$5,857.00	\$79,583.40	\$18,431.60

Summary of Any Objections to Monthly Fee Statements: **None.**

Total Compensation and Expenses Sought in this Interim Application and Not Yet Paid: Fees in the amount of **\$187,606.60** and expenses in the amount of **\$6,522.24**.

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Case No. 23-40523 WJL

Chapter 11

**FIRST INTERIM FEE APPLICATION OF
HILCO REAL ESTATE, LLC AS REAL
ESTATE CONSULTANT FOR ALLOWANCE
AND PAYMENT OF COMPENSATION FOR
THE PERIOD OF JANUARY 21, 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

INTRODUCTION

Hilco Real Estate, LLC ("Hilco") as court-appointed real estate consultant to The Roman Catholic Bishop of Oakland, a California corporation, and the debtor and debtor-in-possession (the "Debtor" or "RCBO"), respectfully submits this first interim application for allowance of compensation (the "Interim Application") for services performed for the Debtor for the period of January 21, 2025 through August 31, 2025 (the "Interim Fee Period") in the above-captioned Chapter 11 bankruptcy case (the "Bankruptcy Case").

Hilco seeks interim approval of its fees and expenses incurred during the Interim Fee Period totaling **\$273,712.24**. This sum represents compensation in the amount of **\$111,333.00** for the total of **211.4** hours spent by Hilco for real estate services provided to the Debtor, an additional flat fee of **\$150,000.00** for real estate appraisals of 40 of the Debtor's diocese properties provided by Hilco, and **\$12,379.24** in out-of-pocket expenses.

Hilco has received a total of **\$79,583.40** in payments for services during the Interim Fee Period and therefore now requests **\$194,128.84** be paid to Hilco.

This Interim Application is based upon the contents hereof. Attached as **Exhibit A** are time records detailing the amount of fees charged and hours worked by Hilco during the Interim Fee Period, as well as an itemization of out-of-pocket expenses sought.

BACKGROUND

General Background

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

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

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

10 **Employment of Hilco**

11 On March 7, 2025 the Debtor's filed the *Debtor's Application for Order Authorizing*
12 *Employment of Hilco Real Estate, LLC as Real Estate Consultant Pursuant to 11 U.S.C. § 327*
13 [Docket No. 1808] (the "Hilco Application"). On March 18, 2025, the Court entered an order
14 approving the Hilco Application effective as of January 21, 2025 [Docket No. 1836].

15 **Summary of Real Estate Services**

16 During the relevant period of this application, Hilco's time was devoted to providing real
17 estate valuation services to the Debtor, including analysis and valuation of the Debtor's real
18 property. In particular, Hilco spent considerable time aggregating data with respect to the Debtor's
19 real property, developing a liquidation analysis, and conducting site visits. In addition, Hilco
20 reviewed and analyzed third-party real estate appraisals of 30 of the Debtor's diocese properties
21 and prepared a report regarding its findings for the Debtor. Finally, at the request of the Debtor's
22 Hilco agreed to complete real estate appraisals of 40 of the Debtor's diocese properties for a flat
23 fee of \$150,000.00. As part of conducting the foregoing services, Hilco also incurred out-of-
24 pocket expenses for travel, transportation, hotels, and meals.

25 **REIMBURSEMENT OF EXPENSES**

26 This application seeks reimbursement of out-of-pocket expenses of \$12,379.24 arising
27 from travel, lodging, meals, transportation, licensure and local appraiser fees.
28

COMPLIANCE WITH GUIDELINES

Hourly Rates

The names and positions of the Hilco professionals who have provided services to the Debtor during the Interim Fee Period are listed below with each such professional's hourly rate.

Professional	Title	Hourly Rate
Jeff Azuse	Executive Vice President	\$800
Matthew Mason	Senior Vice President	\$765
Adam Zimmerman	Senior Vice President	\$600
Chris Parthum	Senior Associate	\$400
John Satter	Senior Managing Director	\$650

Client Review of Billing Statements

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

Notice of Application and Hearing

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

No Agreements to Share Compensation

Hilco has no agreement or understanding of any kind or nature to divide, pay over, or share any portion of the fees to be awarded to it with any other person or attorney.

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CONCLUSION

Hilco believes that the services rendered for which compensation is sought in this Interim Application have been beneficial to the estate and that the sums requested for the services rendered are fair and reasonable.

WHEREFORE, Hilco respectfully requests that the Court make an award interim to Hilco in the amount of **\$273,712.24** inclusive of all fees and costs for the period from January 21, 2025 through August 31, 2025.

DATED: October 15, 2025

HILCO REAL ESTATE, LLC

/s/ Eric W. Kaup

Eric W. Kaup
Authorized Signatory
Hilco Real Estate, LLC

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Exhibit A



INVOICE

INVOICE DATE: March 19, 2025
INVOICE NUMBER: CINV-16054
TERMS: Due Upon Receipt

TO: The Roman Catholic Bishop of Oakland
c/o Foley Lardner

ATTENTION: Thomas F. Carlucci
Shane J. Moses
Ann Marie Uetz
Matthew D. Lee
Mark C. Moore

RE: HRE Hours & Expenses

Consultant	Hours Spent	Fee per Hour		Total Due to Hilco Real Estate
Jeff Azuse	14.8	\$800		\$11,840
Matt Mason	5.2	\$765		\$3,978
Adam Zimmerman	57.9	\$600		\$34,740
Chris Parthum	104	\$400		\$41,600
Total Hours	181.9		Total Hours Fee	\$92,158
Additional Expenses				
Adam Zimmerman Travel				\$1,974
Adam Zimmerman License Application				\$1,383
Local Appraiser Data and Insight				\$2,500
			Total Expenses	\$5,857
TOTAL DUE TO HILCO REAL ESTATE, LLC				\$98,015

TOTAL DUE TO HILCO REAL ESTATE, LLC	\$98,015
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Wiring Instructions

Bank: JP Morgan Chase Bank NA
ABA#: 021 000 021 (wires only)
ACH ABA: 071 000 013
Account #: 838110120
Swift: CHASUS33
Acct. Name: Hilco Real Estate, LLC

Roman Catholic Bishop of Oakland HRE Time Log			
Date	Person	Task Description	Time Spent (Hours)
1/30/2025	Chris Parthum	Data Aggregation related to summarizing provided information	1.2
1/30/2025	Jeff Azuse	Meeting with Foley regarding scope of work and property overview	3.5
1/30/2025	Adam Zimmerman	Meeting with Foley regarding scope of work and property overview	3.5
1/30/2025	Matt Mason	Meeting with Foley regarding scope of work and property overview	3.0
1/31/2025	Chris Parthum	Meeting with Foley regarding scope of work and property overview	3.5
2/3/2025	Adam Zimmerman	Liquidation Model and Analysis Development	3.8
2/3/2025	Chris Parthum	Aggregation of publically available property information	8.0
2/4/2025	Chris Parthum	Liquidation Model and Analysis Development	8.5
2/5/2025	Adam Zimmerman	In-Market Site Visits and Market Review	10.0
2/5/2025	Chris Parthum	Model Building/Data Collecton (Images/Maps of each site)	5.8
2/6/2025	Adam Zimmerman	In-Market Site Visits and Market Review	6.0
2/6/2025	Chris Parthum	Liquidation Model and Analysis Development	8.3
2/7/2025	Chris Parthum	Liquidation Model and Analysis Development	4.8
2/12/2025	Chris Parthum	Liquidation Model and Analysis Development	7.0
2/13/2025	Chris Parthum	Model Building/Data Collection of additional sales comparables	8.5
2/13/2025	Adam Zimmerman	Comparable Sales Review and market research and communciation	6.0
2/14/2025	Adam Zimmerman	Data Aggregation regarding site visit images and notes	2.0
2/14/2025	Chris Parthum	Model Building/Data Collection (Sales Comparables)	8.8
2/17/2025	Chris Parthum	Model Building/Data Application (Sales Comps to Models) & Call with Ann Marie regarding deliverable formatting	8.8
2/17/2025	Jeff Azuse	Call with Foely regarding deliverable format and timing	1.3
2/17/2025	Matt Mason	Client communciation and internal Hilco progress discussions	0.8
2/18/2025	Jeff Azuse	Call with Foley/Vera Cruz regarding deliverable and individual property review.	2.0
2/18/2025	Adam Zimmerman	Call with Foley/Vera Cruz regarding deliverable and individual property review.	6.3
2/18/2025	Chris Parthum	Call with Foley/Vera Cruz regarding deliverable and individual property review.	8.5
2/19/2025	Adam Zimmerman	HRE internal model and presentation work	8.0
2/19/2025	Chris Parthum	Model and Presentation work	8.5
2/19/2025	Jeff Azuse	Project oversight and results analysis review with Adam Zimmerman and Chris	6.0
2/19/2025	Matt Mason	Client communciation and internal Hilco progress discussions	0.6
2/20/2025	Adam Zimmerman	Final Review of Liquidation Analysis Deliverable	7.0
2/20/2025	Chris Parthum	Final Review of Liquidation Analysis Deliverable	8.5
2/20/2025	Jeff Azuse	Final Review and edits of the Liquidation Analysis Deliverable	2.0
2/20/2025	Matt Mason	Final Review and edits of the Liquidation Analysis Deliverable	0.8
2/21/2025	Adam Zimmerman	Final Review and edits of the Liquidation Analysis Deliverable	5.3
2/21/2025	Chris Parthum	Final Review and edits of the Liquidation Analysis Deliverable	5.3



INVOICE

INVOICE DATE: July 23, 2025
INVOICE NUMBER: CINV-18176
TERMS: Due Upon Receipt

TO: The Roman Catholic Bishop of Oakland
c/o Foley Lardner

ATTENTION: Thomas F. Carlucci
Shane J. Moses
Ann Marie Uetz
Matthew D. Lee
Mark C. Moore

RE: Fees & Reimbursements

				Total Due to Hilco Real Estate
Fee				\$150,000.00
Reimbursements				\$6,522.24
Remaining Balance from CINV-16054				\$18,431.60
TOTAL DUE TO HILCO REAL ESTATE, LLC				\$174,953.84

TOTAL DUE TO HILCO REAL ESTATE, LLC	\$174,953.84
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Wiring/ACH Instructions

Bank: Bank of America
Routing number Dom Wires: 026009593
Routing number ACH/EFT: 071000039
Account #: 008670329193
Swift: BOFAUS3N (U.S DOMESTIC) BOFAUS6S (FOREIGN CURRENCY)
Acct. Name: Hilco Real Estate, LLC



Remit to:
Hilco Real Estate Appraisal, LLC
5 Revere Dr, #300
Northbrook, IL 60062
FEIN: 20-0778061

INVOICE

Invoice: CINV-18219
Date: 07/25/2025
Terms: Due Upon Receipt

Jeff Azuse
Hilco Real Estate LLC
5 Revere Drive
Suite 410
Northbrook, IL 60062

Description	Amount
Fee Income	19,175.00
25CP038 Litigation Support The Roman Catholic Bishop of Oakland (RCBO) Real Estate Portfolio	

Total	19,175.00
Open Amount Due(USD)	\$19,175.00

ACH Instructions

Account Name: Hilco Real Estate Appraisal, LLC (BofA)
Bank: Bank of America
Routing #: 071000039
Account #: 8670329198
SWIFT Code: BOFAUS3N

Wire Instructions

Account Name: Hilco Real Estate Appraisal, LLC (BofA)
Bank: Bank of America
Routing #: 026009593
Account #: 8670329198
SWIFT Code: BOFAUS3N

John C. Satter, MAI Time Sheet
The Roman Catholic Bishop of Oakland (RCBO)

Date	Hours	Project or Tasks
July 1, 2025	1.50	Skimmed Stout Report
July 11, 2025	4.50	Read Stout Report; logged values
July 12, 2025	2.00	Analyzed data metrics
July 15, 2025	1.50	Prepped/Call w/ Matt Lee
July 22, 2025	6.00	Rebuttal Report
July 23, 2025	8.00	Rebuttal Report
July 24, 2025	6.00	Rebuttal Report
<hr/>		
Total Hours	29.50	
<hr/>		
Rate (1)	\$650.00	
Total	\$19,175.00	
Expenses	\$0.00	
<hr/>		
Total Due	\$19,175.00	

Notes:

(1) Senior Managing Director rate \$650 per hour.