

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

jprol@lowenstein.com

BRENT WEISENBERG (admitted *pro hac vice*)

bweisenberg@lowenstein.com

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

crestel@lowenstein.com

One Lowenstein Drive

Roseland, New Jersey 07068

Telephone: (973) 597-2500

Facsimile: (973) 597-2400

KELLER BENVENUTTI KIM LLP

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

tkeller@kbbkllp.com

JANE KIM (Cal. Bar No. 298192)

jkim@kbbkllp.com

GABRIELLE L. ALBERT (Cal. Bar No. 190895)

galbert@kbbkllp.com

101 Montgomery Street, Suite 1950

San Francisco, California 94104

Telephone: (415) 496-6723

Facsimile: (650) 636-9251

BURNS BAIR LLPTIMOTHY W. BURNS (admitted *pro hac vice*)

tburns@burnsbair.com

JESSE J. BAIR (admitted *pro hac vice*)

jbair@burnsbair.com

10 E. Doty Street, Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2302

Counsel for the Official Committee of Unsecured Creditors

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

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

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

TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:

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

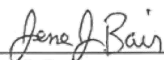
Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement for the Period of September 1, 2025 through September 30, 2025 (the “**Monthly Fee Statement**”). Pursuant to the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. 170] (the “**Interim Fee Order**”)¹ entered by the Court on June 23, 2023, and the Agreed Order Amending Procedures For Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. 2101] (the “**Amended Fee Order**”) entered by the Court on June 27, 2025, the total legal fees and costs expended by Burns Bair on account of the Committee is as follows:

Period	Fees	Expenses	Total
September 1, 2025 through September 30, 2025	\$101,639.00	\$353.68	\$101,992.68
Net Total Allowed Payments this Statement Period: (70% of Fees and 100% of Costs)	\$71,147.30	\$353.68	\$71,500.98

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

Dated: October 30, 2025

BURNS BAIR LLP

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

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

EXHIBIT A

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 10/30/2025

Bill # : 02052

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/4/2025	Jesse Bair	Prepare for state court counsel meeting (.2); participate in state court counsel meeting re case developments, strategy, and ongoing negotiations (.7);	0.90	\$810.00
9/5/2025	Timothy Burns	Participate in Committee meeting for insurance purposes re case developments, strategy, and next-steps (2.3);	2.30	\$2,576.00
9/8/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re ongoing case negotiations, strategy, and next-steps (1.5);	1.50	\$1,350.00
9/8/2025	Timothy Burns	Participate in Committee meeting re case status, strategy, and next-steps (1.5);	1.50	\$1,680.00
9/11/2025	Timothy Burns	Participate in state court counsel meeting for insurance purposes re mediation strategy (1.0);	1.00	\$1,120.00
9/11/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case strategy and ongoing negotiations (1.0);	1.00	\$900.00
9/12/2025	Timothy Burns	Participate in Committee meeting re mediation strategy and next-steps (.8);	0.80	\$896.00
9/12/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case negotiations and strategy (.8);	0.80	\$720.00
Totals for Committee Meetings			9.80	\$10,052.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/26/2025	Brenda Horn-Edwards	Draft declaration of S. Woodall in support of Burns Bair sixth interim fee application (.1);	0.10	\$34.00

9/26/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and correspond with J. Bair re same (.3);	0.30	\$102.00
9/26/2025	Brenda Horn-Edwards	Draft exhibits to Burns Bair sixth interim fee application (.9);	0.90	\$306.00
9/26/2025	Brenda Horn-Edwards	Draft declaration of J. Bair in support of Burns Bair sixth interim fee application (.2); draft Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.40	\$136.00
9/26/2025	Brenda Horn-Edwards	Draft sixth interim fee application (1.6);	1.60	\$544.00
9/26/2025	Jesse Bair	Review and edit monthly fee statement and correspond with KBK and B. Horn-Edwards re same (.2);	0.20	\$180.00
9/29/2025	Jesse Bair	Review and respond to correspondence re next round of interim fee applications (.1);	0.10	\$90.00
9/30/2025	Jesse Bair	Review and edit interim fee application and accompanying exhibits (1.2);	1.20	\$1,080.00
Totals for Fee Applications			4.80	\$2,472.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/9/2025	Timothy Burns	Attend hearing re status conference and motion to reconsider (2.0);	2.00	\$2,240.00
9/22/2025	Jesse Bair	Attend case status conference for insurance purposes re mediation and motion to dismiss issues (.5);	0.50	\$450.00
9/22/2025	Timothy Burns	Participate in case status conference re mediation and motion to dismiss issues (.5);	0.50	\$560.00
Totals for Hearings			3.00	\$3,250.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/2/2025	Timothy Burns	Review and respond to correspondence with state court counsel and analysis re insurers' proposed intervention in the state court coordinated proceeding (.8);	0.80	\$896.00
9/2/2025	Timothy Burns	Participate in conference with Committee professionals re potential counteroffer (.6); review follow-up correspondence with Committee professionals re same (.2);	0.80	\$896.00
9/2/2025	Timothy Burns	Review Committee letter to Judge Corley re appeal briefing issues (.2);	0.20	\$224.00

9/2/2025	Nathan Kuenzi	Draft summary re key insurance-related terms to be modified or included in amended plan (.9);	0.90	\$495.00
9/2/2025	Jesse Bair	Analyze Debtor Plan and formulate insurance revisions needed for any potential resolution (1.3); review and respond to correspondence with Committee professionals re same and potential term sheet (.3);	1.60	\$1,440.00
9/2/2025	Jesse Bair	Participate in call with Committee professionals re negotiations and insurance strategy and next-steps in connection with same (.6);	0.60	\$540.00
9/3/2025	Jesse Bair	Brief review re draft insurance term sheet (.2);	0.20	\$180.00
9/3/2025	Nathan Kuenzi	Continue analyzing Plan and Plan Supplement insurance-related terms and draft summary re same in connection with ongoing negotiations (2.8);	2.80	\$1,540.00
9/4/2025	Jesse Bair	Additional analysis re potential insurance term sheet and needed changes to Plan (.2);	0.20	\$180.00
9/4/2025	Jesse Bair	Review correspondence from the mediator re future session and consideration re same (.1);	0.10	\$90.00
9/5/2025	Timothy Burns	Review revised PowerPoint presentation for upcoming Committee meeting (.4); review and respond to correspondence with Committee professionals re same (.3);	0.70	\$784.00
9/5/2025	Timothy Burns	Review insurance term sheet re counter (.2); correspond with Committee professionals re same (.1);	0.30	\$336.00
9/5/2025	Timothy Burns	Review consolidation of appeals orders (.1); review B. Weisenberg declaration in support of the Committee's preliminary objection (.1);	0.20	\$224.00
9/5/2025	Timothy Burns	Participate in conference with J. Bair re outcome of Committee meeting and next-steps (.2); participate in call with state court counsel re same (.2);	0.40	\$448.00
9/5/2025	Jesse Bair	Draft revised insurance term sheet for use in ongoing negotiations (1.6);	1.60	\$1,440.00
9/5/2025	Jesse Bair	Review final version of Committee strategy presentation and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
9/5/2025	Jesse Bair	Participate in conference with T. Burns re outcome of Committee meeting, ongoing negotiations, and related case strategy (.2);	0.20	\$180.00
9/6/2025	Jesse Bair	Review and edit revised version of the Committee's insurance term sheet (.5);	0.50	\$450.00

9/6/2025	Jesse Bair	Review and edit the Committee's response letter to the debtor's settlement proposal (.6);	0.60	\$540.00
9/7/2025	Timothy Burns	Review and revise draft counter and related documents (1.2);	1.20	\$1,344.00
9/7/2025	Jesse Bair	Review and edit draft Committee letter to the Court re September 9 status conference (.1); revised response letter to the debtor (.2); revised insurance term sheet (.2); and draft Committee letter to the mediators re ongoing negotiations (.1);	0.60	\$540.00
9/8/2025	Timothy Burns	Review correspondence with Committee professionals, the Committee, and state court counsel re potential counter (.1);	0.10	\$112.00
9/8/2025	Nathan Kuenzi	Analyze all prior settlement offers, counters, and other negotiations with insurers to date and draft summary in connection with ongoing negotiations and upcoming insurance mediation sessions (1.8);	1.80	\$990.00
9/8/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re ongoing negotiations, including related correspondence with insurers and mediators re same (.3);	0.30	\$270.00
9/8/2025	Timothy Burns	Participate in conference with mediator re mediation issues and ongoing negotiations (.2); correspondence with Committee professionals re same (.2);	0.40	\$448.00
9/8/2025	Jesse Bair	Prepare for Committee meeting re ongoing case negotiations (.2);	0.20	\$180.00
9/8/2025	Timothy Burns	Review draft JCCP filing re insurer intervention and related correspondence with state court counsel re same (.8);	0.80	\$896.00
9/8/2025	Timothy Burns	Review and respond to correspondence with B. Weisenberg re Committee presentation and counter issues (.2);	0.20	\$224.00
9/8/2025	Jesse Bair	Review correspondence and draft brief in opposition to Chubb's attempted intervention in the coordinated state court proceeding re lift stay cases (.2);	0.20	\$180.00
9/8/2025	Nathan Kuenzi	Review and respond to correspondence with state court counsel re lift stay insurance issues (.3);	0.30	\$165.00
9/9/2025	Timothy Burns	Conference with B. Weisenberg re Debtor's status conference statement (.2);	0.20	\$224.00
9/9/2025	Timothy Burns	Participate in call with state court counsel re status hearing and counteroffer (.2);	0.20	\$224.00
9/9/2025	Timothy Burns	Prepare for status hearing by reviewing filings and various mediation-related communications (.9);	0.90	\$1,008.00

9/9/2025	Nathan Kuenzi	Correspond with T. Burns re prior insurer demands (.2);	0.20	\$110.00
9/9/2025	Timothy Burns	Participate in call with T. Gallagher re insurance mediation issues (.2);	0.20	\$224.00
9/9/2025	Jesse Bair	Analyze insurance Plan issues and negotiation issues in light of debtor motion to dismiss (.4);	0.40	\$360.00
9/9/2025	Timothy Burns	Review and analysis of Debtor's status conference statement (.3);	0.30	\$336.00
9/9/2025	Jesse Bair	Review the debtor's status conference letter and consideration re case next-steps (.2);	0.20	\$180.00
9/10/2025	Timothy Burns	Review motion to dismiss Chapter 11 case (.4);	0.40	\$448.00
9/10/2025	Timothy Burns	Conference with B. Weisenberg re mediation strategy (.4);	0.40	\$448.00
9/10/2025	Timothy Burns	Review and respond to multiple correspondence with state court counsel re mediation strategy (.5);	0.50	\$560.00
9/10/2025	Alexander Castro	Draft chart of uninsured claims (1.1);	1.10	\$517.00
9/10/2025	Jesse Bair	Review various correspondence with Committee professionals, the Committee, state court counsel re debtor's dismissal motion, mediation strategy, and next-steps (.3);	0.30	\$270.00
9/10/2025	Timothy Burns	Review of potential settlement ranges for mediation and assess potential counters for ongoing negotiations (.9);	0.90	\$1,008.00
9/10/2025	Timothy Burns	Conference with mediator regarding settlement issues (.2);	0.20	\$224.00
9/10/2025	Timothy Burns	Conference with T. Gallagher re mediation meetings with insurers (.2);	0.20	\$224.00
9/10/2025	Jesse Bair	Analyze claim data and develop revised insurer exposure assessments in connection with ongoing negotiations (.8);	0.80	\$720.00
9/10/2025	Nathan Kuenzi	Analyze claims falling exclusively within Atlantic Mutual period and post-1987/pre-2003 (.8);	0.80	\$440.00
9/10/2025	Nathan Kuenzi	Begin drafting redline of Third Amended Plan to address various insurance-related issues (2.9);	2.90	\$1,595.00
9/10/2025	Nathan Kuenzi	Analyze Plan terms from other potentially-relevant Diocesan bankruptcies in connection with insurance assignment and related provisions (1.4);	1.40	\$770.00
9/10/2025	Nathan Kuenzi	Draft summary re revised carrier claim counts (.4);	0.40	\$220.00
9/11/2025	Timothy Burns	Participate in conference with B. Weisenberg re state court counsel meeting, insurance strategy, insurer meetings, and mediation strategy (.5);	0.50	\$560.00

9/11/2025	Timothy Burns	Review correspondence with state court counsel and the debtor re lift stay cases (.2);	0.20	\$224.00
9/11/2025	Timothy Burns	Participate in Zoom mediation session with Westport (.6);	0.60	\$672.00
9/11/2025	Jesse Bair	Participate in Zoom mediation session with CNA (.8);	0.80	\$720.00
9/11/2025	Nathan Kuenzi	Analyze insurance issues in connection with potential lift stay cases and draft summary re same (.5);	0.50	\$275.00
9/11/2025	Nathan Kuenzi	Analyze potential insurance assignment approaches used in other Diocesan cases (.3);	0.30	\$165.00
9/11/2025	Nathan Kuenzi	Continue drafting redline of Third Amended Plan to address various insurance-related issues (2.3);	2.30	\$1,265.00
9/11/2025	Timothy Burns	Participate in Zoom mediation session with CNA (.8);	0.80	\$896.00
9/11/2025	Timothy Burns	Review N. Kuenzi's summary of meet and confer with debtor and state court counsel re lift stay cases (.2);	0.20	\$224.00
9/11/2025	Timothy Burns	Correspondence with B. Weisenberg re mediation issues (.2);	0.20	\$224.00
9/11/2025	Jesse Bair	Participate in additional call with mediator re case insurance issues and negotiations (.2);	0.20	\$180.00
9/11/2025	Jesse Bair	Participate in Zoom mediation session with Westport (.6); post-session analysis re potential next-steps re case insurance issues (.2);	0.80	\$720.00
9/11/2025	Jesse Bair	Analyze insurance issues in connection with potential lift stay cases and correspond with state court counsel re same (.4);	0.40	\$360.00
9/11/2025	Nathan Kuenzi	Additional analysis re claims falling exclusively within non-insured periods (.9);	0.90	\$495.00
9/11/2025	Timothy Burns	Review New Orleans plan referenced by insurer at status hearing (.8);	0.80	\$896.00
9/11/2025	Jesse Bair	Prepare for upcoming insurance mediation sessions (.2);	0.20	\$180.00
9/11/2025	Nathan Kuenzi	Review and respond to correspondence with state court counsel re insurance lift stay issues (.4);	0.40	\$220.00
9/11/2025	Timothy Burns	Prepare for mediation sessions with CNA and Westport (.8);	0.80	\$896.00
9/12/2025	Jesse Bair	Participate in call with the mediator re case negotiations (.4); participate in post-session call with Committee professionals re next-steps and strategy (.3);	0.70	\$630.00
9/12/2025	Timothy Burns	Conference with B. Weisenberg re insurance lift stay appellate briefing (.2);	0.20	\$224.00

9/12/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation issues (.2);	0.20	\$224.00
9/12/2025	Jesse Bair	Brief review re insurance assignment language from Diocese of New Orleans Plan in connection with case negotiations (.2); continue analyzing potential revisions to RCBO Plan in connection with same (.2);	0.40	\$360.00
9/12/2025	Nathan Kuenzi	Continue drafting redline of Third Amended Plan to address various insurance-related issues (3.4);	3.40	\$1,870.00
9/13/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re the insurers' lift stay appellate brief (.1);	0.10	\$90.00
9/15/2025	Erin Quick	Research case law re bankruptcy court authority over automatic stay motions (.2);	0.20	\$110.00
9/15/2025	Erin Quick	Analyze Insurers' brief in support of appeal of decision to lift stay and related filings (2.1);	2.10	\$1,155.00
9/15/2025	Jesse Bair	Participate in call with the mediator and Committee professionals re ongoing case negotiations (.3); participate in post-session call with Committee professionals re case next-steps (.2);	0.50	\$450.00
9/15/2025	Timothy Burns	Participate in call with state court counsel re mediation negotiations (.2);	0.20	\$224.00
9/15/2025	Jesse Bair	Review correspondence with the debtor, insurers, and Committee professionals re ongoing mediation negotiations (.2);	0.20	\$180.00
9/15/2025	Erin Quick	Analyze briefs and hearing transcripts re the Committee's motions to lift automatic bankruptcy stay (2.8);	2.80	\$1,540.00
9/15/2025	Timothy Burns	Participate in conferences with Lowenstein re mediation issues (.4);	0.40	\$448.00
9/15/2025	Timothy Burns	Review and respond to correspondence with the debtor re mediation issues (.4);	0.40	\$448.00
9/15/2025	Erin Quick	Draft outline of brief in opposition to Insurers' appeal of lift stay order and consideration of strategy in connection with same (.9);	0.90	\$495.00
9/15/2025	Jesse Bair	Review the insurers' lift stay appellate brief (.5); draft preliminary outline re response to same (.6); provide instructions re preparing response brief (.2);	1.30	\$1,170.00
9/16/2025	Jesse Bair	Review correspondence with the mediators, debtor, and insurers re upcoming mediation sessions (.1);	0.10	\$90.00
9/16/2025	Timothy Burns	Review and respond to multiple correspondence with the Debtor, Committee counsel, insurers, and mediators re mediation issues (.5);	0.50	\$560.00

9/16/2025	Erin Quick	Continue analysis of insurers' arguments re factual support in appeal of lift stay order (1.0)	1.00	\$550.00
9/16/2025	Timothy Burns	Participate in call with mediator re insurance negotiations (.2);	0.20	\$224.00
9/16/2025	Erin Quick	Continue outlining brief in opposition to Insurers' appeal of lift stay order (1.4);	1.40	\$770.00
9/16/2025	Jesse Bair	Review and edit revised outline re the Committee's opposition to the insurers' lift stay appeal (.2);	0.20	\$180.00
9/17/2025	Timothy Burns	Review correspondence with mediators re mediation sessions (.2);	0.20	\$224.00
9/17/2025	Karen Dempski	Docket/calendar status conference motion to dismiss (.1);	0.10	\$34.00
9/17/2025	Timothy Burns	Review and respond to E. Quick's outline re appellate response brief (.3);	0.30	\$336.00
9/17/2025	Erin Quick	Draft legal standard section of brief in opposition to Insurers' appeal of lift stay order (.6);	0.60	\$330.00
9/17/2025	Erin Quick	Continue analyzing case law cited in the insurers' brief (1.2)	1.20	\$660.00
9/17/2025	Erin Quick	Draft section of brief in opposition to Insurers' appeal of lift stay order re draft response brief argument re correct application of law to facts (2.3);	2.30	\$1,265.00
9/17/2025	Timothy Burns	Review and respond to correspondence from Foley re meditation (.2);	0.20	\$224.00
9/17/2025	Jesse Bair	Review notice of status conference and correspondence with debtor, insurers, and mediator re same and upcoming all-hands session (.1);	0.10	\$90.00
9/18/2025	Timothy Burns	Participate in call with T. Gallagher re upcoming mediation session and related insurer meetings (.2);	0.20	\$224.00
9/18/2025	Timothy Burns	Review and respond to correspondence with mediation parties and mediators re upcoming sessions and ongoing negotiations (.3);	0.30	\$336.00
9/18/2025	Timothy Burns	Participate in call with J. Prol re mediation negotiations (.2);	0.20	\$224.00
9/18/2025	Erin Quick	Draft counterargument section of opposition brief re bankruptcy courts' authority to modify automatic stays (2.3);	2.30	\$1,265.00
9/18/2025	Timothy Burns	Review and respond to correspondence with B. Weisenberg and Debtor re mediation (.1);	0.10	\$112.00
9/18/2025	Erin Quick	Draft argument section of brief re affirmative reasons that support the court's lift stay order (4.2);	4.20	\$2,310.00

9/18/2025	Jesse Bair	Review additional correspondence with mediators and parties re October mediation session and ongoing negotiations (.1);	0.10	\$90.00
9/19/2025	Erin Quick	Draft counterargument section of opposition brief re Insurer standing and equal treatment of creditors (2.1);	2.10	\$1,155.00
9/19/2025	Erin Quick	Draft counterargument section of opposition brief re factual support for bankruptcy courts' lift stay order (4.3);	4.30	\$2,365.00
9/19/2025	Jesse Bair	Review New Orleans Plan insurance assignment language in connection with continuing Oakland negotiations and correspond with Committee professionals re same (.4);	0.40	\$360.00
9/19/2025	Erin Quick	Draft counterargument section of opposition brief re Committee standing to move for stay relief (.8);	0.80	\$440.00
9/19/2025	Timothy Burns	Review the Committee's response to Debtor's motion to dismiss (.8);	0.80	\$896.00
9/20/2025	Jesse Bair	Review the Committee's response to the Debtor's motion to dismiss (.4);	0.40	\$360.00
9/20/2025	Jesse Bair	Review the debtor's status conference statement (.1);	0.10	\$90.00
9/21/2025	Jesse Bair	Preliminary review of draft Committee response to the insurers' lift stay appeal and correspond with BB team re suggested revisions to same (.4);	0.40	\$360.00
9/21/2025	Erin Quick	Draft introduction section of brief in opposition to Insurers' appeal of the lift stay order (2.1);	2.10	\$1,155.00
9/21/2025	Erin Quick	Revise draft brief in opposition to Insurers' appeal of the lift stay order (1.7);	1.70	\$935.00
9/22/2025	Timothy Burns	Review Debtor's status conference statement and prepare for status conference (.4);	0.40	\$448.00
9/22/2025	Erin Quick	Revise draft brief in opposition to lift stay appeal to incorporate preliminary comments from partners (2.1);	2.10	\$1,155.00
9/22/2025	Timothy Burns	Participate in call with mediator re ongoing insurer meetings (.2); review and respond to correspondence with mediator re same (.2);	0.40	\$448.00
9/22/2025	Karen Dempsey	Docket/calendar hearing on motion to dismiss (.1);	0.10	\$34.00
9/22/2025	Timothy Burns	Review E. Quick's response re brief edits and correspond with E. Quick re same (.4);	0.40	\$448.00
9/22/2025	Timothy Burns	Review and reply to J. Prol's email re status hearing and mediation (.2);	0.20	\$224.00

9/22/2025	Timothy Burns	Review correspondence with Committee professionals and the Committee re status hearing (.1);	0.10	\$112.00
9/22/2025	Jesse Bair	Review correspondence with Committee professionals, the Committee, and state court counsel re status conference outcome and mediation issues (.2);	0.20	\$180.00
9/22/2025	Timothy Burns	Review correspondence with the Committee, Committee professionals, and state court counsel re ongoing mediation issues (.2); participate in call with B. Weisenberg re same (.2);	0.40	\$448.00
9/22/2025	Timothy Burns	Review and revise appellee's brief re insurers' appeal of lift stay order (1.2);	1.20	\$1,344.00
9/23/2025	Timothy Burns	Prepare for Travelers mediation session (.7);	0.70	\$784.00
9/23/2025	Erin Quick	Revise draft brief in opposition to lift stay appeal per comments from J Bair (1.2);	1.20	\$660.00
9/23/2025	Jesse Bair	Review and edit the Committee's response to the insurers' lift stay appellate brief (1.5);	1.50	\$1,350.00
9/23/2025	Timothy Burns	Participate in Zoom mediation session with Travelers (.8);	0.80	\$896.00
9/23/2025	Jesse Bair	Prepare for mediation session with Travelers (.2);	0.20	\$180.00
9/23/2025	Jesse Bair	Participate in Zoom mediation session with Travelers (.8);	0.80	\$720.00
9/24/2025	Erin Quick	Analyze tentative decision re insurer intervention and correspond with B. Weisenberg, J. Bair, and T. Burns re same (.3);	0.30	\$165.00
9/24/2025	Jesse Bair	Participate in call with Lowenstein re the Committee's lift stay appellate brief (.1);	0.10	\$90.00
9/24/2025	Jesse Bair	Review tentative Order granting Chubb intervention in the state court coordinated proceeding to participate in lift stay case selection process and correspond with Committee professionals re same (.3);	0.30	\$270.00
9/24/2025	Timothy Burns	Review JCCP order re insurer intervention and related correspondence with state court counsel (.2);	0.20	\$224.00
9/25/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation issues and negotiations (.4);	0.40	\$448.00
9/25/2025	Timothy Burns	Prepare for mediation with insurers (.4);	0.40	\$448.00
9/25/2025	Jesse Bair	Participate in call with T. Burns re ongoing insurance negotiations and call with mediators re same (.2);	0.20	\$180.00
9/25/2025	Erin Quick	Revise opposition brief to address revisions and comments from B. Weisenberg (5.2);	5.20	\$2,860.00

9/25/2025	Timothy Burns	Participate in call with mediator re insurance negotiations (.2);	0.20	\$224.00
9/25/2025	Timothy Burns	Review B. Weisenberg's edits to draft appellate brief (.4);	0.40	\$448.00
9/25/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re revisions to the Committee's lift stay appeal brief (.2);	0.20	\$180.00
9/25/2025	Timothy Burns	Review correspondence with Committee professionals re impact of JCCP ruling on appeal briefs (.2);	0.20	\$224.00
9/25/2025	Timothy Burns	Participate in call with mediator and Lowenstein re mediation negotiations (.7);	0.70	\$784.00
9/25/2025	Timothy Burns	Participate in call with state court counsel re JCCP ruling re insurer intervention (.2);	0.20	\$224.00
9/25/2025	Timothy Burns	Participate in call with J. Bair re insurance negotiation developments (.2);	0.20	\$224.00
9/26/2025	Jesse Bair	Review and edit revised draft of the Committee's response to the insurers' lift stay appeal (.7);	0.70	\$630.00
9/26/2025	Erin Quick	Finalize draft opposition brief per comments from J. Bair and send to B. Weisenberg (.7);	0.70	\$385.00
9/27/2025	Jesse Bair	Review stipulation to extend discovery deadlines in the insurance district court action (.1);	0.10	\$90.00
9/29/2025	Timothy Burns	Review correspondence from mediator re mediation negotiations (.1); participate in conferences with Committee professionals and state court counsel re same (.4);	0.50	\$560.00
9/29/2025	Jesse Bair	Review correspondence from the mediators re ongoing negotiations (.1);	0.10	\$90.00
9/29/2025	Jesse Bair	Participate in calls with Committee professionals and state court counsel re ongoing negotiations and related strategy and preparations of upcoming session (.4);	0.40	\$360.00
9/29/2025	Timothy Burns	Review RCBO's letter to Travelers re defense of lift stay cases (.2); review Cal. Civil Code Section 2860 re independent counsel (.2); correspondence with B. Weisenberg re same (.1);	0.50	\$560.00
9/29/2025	Erin Quick	Revise draft opposition brief to incorporate additional edits from B. Weisenberg and add citations to record (1.9);	1.90	\$1,045.00
9/29/2025	Timothy Burns	Review B. Weisenberg's edits to appeal briefing and related correspondence (.2);	0.20	\$224.00
9/29/2025	Timothy Burns	Review and respond to internal correspondence re deadline for insurers and debtor to submit discovery disputes (.2); review filed Stipulation between Debtor and insurers re same (.1);	0.30	\$336.00

9/30/2025	Erin Quick	Revise brief per additional comments from B. Weisenberg re record cites (.4);	0.40	\$220.00
9/30/2025	Timothy Burns	Review E. Quick correspondence re latest draft of appeals brief (.1); review correspondence from B. Weisenberg and Debtor's counsel re mediation (.2); review B. Weisenberg's suggested edits to appeals brief draft (.2);	0.50	\$560.00
9/30/2025	Jesse Bair	Review debtor letter to Travelers re lift stay defense issues (.1);	0.10	\$90.00
9/30/2025	Jesse Bair	Review correspondence with the mediators and parties re ongoing negotiations (.1)	0.10	\$90.00
9/30/2025	Jesse Bair	Review and respond to correspondence with state court counsel re lift stay insurance issues (.2);	0.20	\$180.00
9/30/2025	Erin Quick	Research standard for judicial notice in the Ninth Circuit (.6);	0.60	\$330.00
9/30/2025	Erin Quick	Draft request for judicial notice of tentative decision in JCCP 5108 (.3);	0.30	\$165.00
Totals for Insurance Recovery Activities			113.20	\$85,865.00

Total Hours and Fees	130.80	\$101,639.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/15/2025	Certificate of Good Standing, E. Quick (pro hac vice)	\$25.68
09/24/2025	Filing fee, E. Quick pro hac vice admission	\$328.00
Total Expenses		\$353.68

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	1.10	\$470.00	\$517.00
Brenda Horn-Edwards	Paralegal	3.30	\$340.00	\$1,122.00
Erin Quick	Associate	42.70	\$550.00	\$23,485.00
Jesse Bair	Partner	27.60	\$900.00	\$24,840.00
Karen Dempski	Paralegal	0.20	\$340.00	\$68.00
Nathan Kuenzi	Associate	19.30	\$550.00	\$10,615.00
Timothy Burns	Partner	36.60	\$1,120.00	\$40,992.00

Total Due This Invoice: \$101,992.68