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*Counsel for the Official Committee of Unsecured
Creditors***UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION***In re:*THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**TWENTY-EIGHTH MONTHLY
PROFESSIONAL FEE STATEMENT
FOR LOWENSTEIN SANDLER LLP
FOR SEPTEMBER 1, 2025 THROUGH
SEPTEMBER 30, 2025****TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

NOTICE IS HEREBY GIVEN that Lowenstein Sandler LLP (“**Lowenstein**”), lead counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman Catholic Bishop of Oakland (the “**Debtor**”), files its twenty-eighth Monthly Professional Fee Statement for the period of September 1, 2025 through September 30, 2025 (the “**Monthly Fee Statement**”). Pursuant to the *Agreed Order Amending Procedures for Interim Compensation and*

1 *Reimbursement of Expenses of Professionals* [Dkt. 2101] (the “**Modified Interim Fee Order**”)¹
2 entered by the Court on June 27, 2025, the total legal fees and costs expended by Lowenstein on
3 account of its representation of the Committee for the period of September 1, 2025 through
4 September 30, 2025, is:

Period	Fees	Expenses	Total
September 1, 2025 through September 30, 2025	\$276,219.00	\$8,116.35	\$284,335.35
Net Total Allowed Payments this Statement Period: (70% of Fees and 100% of Costs)	\$193,353.30	\$8,116.35	\$201,469.65

11 The itemized billing statements for the fees billed and expenses incurred are attached
12 hereto as **Exhibits A and B**, respectively. Notice Parties have 10 days from the date of service
13 of this Monthly Fee Statement to file an objection thereto. If no objection is filed, Lowenstein
14 may file a certificate of no objection (or if an Objection was timely served, a certificate of partial
15 objection) with the Court after which the Debtor, without further order of the Court, shall pay
16 Lowenstein an amount equal to the lesser of: (1) 70% of the fees and 100% of the expenses
17 requested in the Monthly Fee Statement, and (2) if an Objection was served, 70% of the fees and
18 100% of the expenses to which there was no Objection no later than five business days after the
19 filing of the relevant certificate.

20 Dated: October 30, 2025

LOWENSTEIN SANDLER LLP

21
22 By: /s/ Jeffrey D. Prol
Jeffrey D. Prol
23 Brent Weisenberg
Colleen Restel
24 One Lowenstein Drive
Roseland, New Jersey 07068
25 Telephone: (973) 597-2500

26 *Counsel for the Official Committee
of Unsecured Creditors*

27 ¹ Capitalized terms not otherwise defined have the meaning ascribed to them in the Interim Fee Order.
28

EXHIBIT A

Professional Services rendered by Lowenstein Sandler LLP, through September 30, 2025

In re: Chapter 11 Proceeding

I. SUMMARY OF TIME CHARGES AND HOURLY RATES

Name of Professional	Year Admitted	Title/Department	Hours Spent	Hourly Rate	Charge
Kaplan, Michael A.	2011	Partner/Litigation	10.40	\$1,135.00	\$11,804.00
Prol, Jeffrey D.	1990	Partner/Bankruptcy	57.70	\$1,370.00	\$79,049.00
Ramey, Elinor Carson	2008	Partner/Corporate / Tax	4.50	\$1,210.00	\$5,445.00
Restel, Colleen M.	2015	Partner/Bankruptcy	4.70	\$1,125.00	\$5,287.50
Weisenberg, Brent I.	2002	Partner/Bankruptcy	92.20	\$1,160.00	\$106,952.00
Gross, Philip J.	2008	Counsel/Bankruptcy	28.70	\$1,095.00	\$31,426.50
Sklar, Lindsay H.	2014	Counsel/Bankruptcy	17.60	\$1,055.00	\$18,568.00
Daniel, Kathryn A.	2024	Associate/Corporate / Tax	8.80	\$650.00	\$5,720.00
Giblin, Anna Maria	2023	Associate/Litigation	11.40	\$715.00	\$8,151.00
Rauchberg, Jake A.	2023	Associate/Bankruptcy	3.60	\$660.00	\$2,376.00
Claussen, Diane	N/A	Paralegal/Bankruptcy	3.60	\$400.00	\$1,440.00
TOTAL FEES			243.20		\$276,219.00
Attorney Blended Rate					\$1,146.82

TIME DETAIL:

Code	Date	Timekeeper	Time Narrative	Hours	Amount
<u>B100 - Administration</u>					
<u>B110 Case Administration</u>					
B110	09/04/25	DC	Review lead case, adversary proceedings and appeals dockets, update critical dates memo and attorney calendar	0.50	\$200.00
B110	09/10/25	DC	Review docket, update critical dates memo	0.30	\$120.00
B110	09/18/25	DC	Review all court dockets, circulate zoom links for 9/22/25 hearings, update critical dates memo and attorney calendar	0.40	\$160.00
B110	09/25/25	DC	Review docket text scheduling order and update attorney calendar	0.30	\$120.00
B110	09/29/25	DC	Update critical dates memo and attorney calendar	0.20	\$80.00
B110	09/30/25	DC	Confer with B. Weisenberg re: due date for interim fee applications (.1) and update attorney calendar (.1)	0.20	\$80.00
Total B110 - Case Administration				1.90	\$760.00
<u>B130 Asset Disposition</u>					
B130	09/01/25	BIW	Draft email to M. Lee re: confirm extension of certain deadlines re: CCSS Motion	0.20	\$232.00
B130	09/01/25	BIW	Further revise Objection to CCSS Motion	1.10	\$1,276.00
B130	09/01/25	JAR	Revise objection to CCSS sale motion	0.10	\$66.00
B130	09/01/25	KAD	Conduct research re: the transferability of governance rights for nonprofit, religious organizations; analyze case and statutory law and summarize findings; submit analysis to E. Ramey for review	4.60	\$2,990.00
B130	09/02/25	BIW	Further revise Objection to CCSS Motion in light of recently produced documents	2.30	\$2,668.00
B130	09/02/25	CMR	Coordinate with LS Team re: document production	0.10	\$112.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B130	09/02/25	ECR	Review research on transfer of governance rights	2.50	\$3,025.00
B130	09/02/25	JAR	Revise objection to CCSS sale motion	0.20	\$132.00
B130	09/02/25	JDP	Review and edit draft objection to CCSS divestiture motion	2.20	\$3,014.00
B130	09/03/25	AMG	Review Debtor's document production	1.10	\$786.50
B130	09/03/25	BIW	Review research (.4) and confer with E. Ramey re: analysis of CCSS Motion (.2)	0.60	\$696.00
B130	09/03/25	BIW	Further revise Objection to CCSS Motion in light of recently produced documents and information from BRG	1.40	\$1,624.00
B130	09/03/25	BIW	Review CCSS documents	0.80	\$928.00
B130	09/03/25	CMR	Confer with LS Team re: analysis of documents produced re: Sale Motion	0.20	\$225.00
B130	09/03/25	ECR	Call to discuss research, review language for objection re transfer of governance rights	2.00	\$2,420.00
B130	09/03/25	JAR	Revise objection to CCSS sale motion and prepare client documents for filing (2.8); correspondence with B. Weisenberg re: same (0.2)	3.00	\$1,980.00
B130	09/03/25	JDP	Review and comment on California corporate law research on whether control rights are a property interest that can be sold (.5); review and revise objection to sale of interest in CCSS (1.2)	1.70	\$2,329.00
B130	09/03/25	KAD	Finalize research re: the transferability of governance rights for nonprofit, religious organizations; draft and edit motion section; confer with E. Ramey and submit draft for review	4.20	\$2,730.00
B130	09/04/25	BIW	Finalize CCSS Objection and B. Weisenberg Declaration in support	0.80	\$928.00
B130	09/04/25	JAR	Further revise objection to CCSS sale motion and prepare documents for filing (0.2); call with B. Weisenberg re: same (0.1)	0.30	\$198.00
B130	09/04/25	JDP	Review and comment on final draft of objection to CCSS motion	0.60	\$822.00
B130	09/04/25	JDP	Review and edit final draft of objection to CCSS divestiture motion	1.20	\$1,644.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
Total B130 - Asset Disposition				31.20	\$30,826.00
<u>B150 Meetings of and Communication with Creditors</u>					
B150	09/01/25	BIW	Draft email to Committee re: update on status of CCSS Motion	0.40	\$464.00
B150	09/02/25	BIW	Confer with counsel for Committee member re: prepare for bi-weekly meeting with Committee	0.40	\$464.00
B150	09/02/25	BIW	Draft several emails to counsel for Committee members re: preparation for Committee call later in the week	0.40	\$464.00
B150	09/02/25	BIW	Confer with counsel for Committee member re: status of case and questions on September 9th hearing	0.50	\$580.00
B150	09/02/25	BIW	Confer with BRG re: prepare for bi-weekly call with Committee on settlement ranges	0.50	\$580.00
B150	09/02/25	BIW	Confer with Survivor re: status of case and questions on September 9th hearing	0.50	\$580.00
B150	09/03/25	BIW	Confer with counsel for Committee member re: prepare for bi-weekly meeting with Committee	0.40	\$464.00
B150	09/03/25	BIW	Confer with Committee member re: status of case and questions on September 9th hearing	0.60	\$696.00
B150	09/03/25	BIW	Confer with Committee member re: prepare for bi-weekly meeting with Committee	0.50	\$580.00
B150	09/03/25	BIW	Draft email to counsel for Committee members re: agenda for bi-weekly call	0.20	\$232.00
B150	09/04/25	BIW	Draft email to Committee members re: agenda for bi-weekly call	0.20	\$232.00
B150	09/04/25	BIW	Confer with T. Burns re: prepare for following day's call with Committee	0.30	\$348.00
B150	09/04/25	BIW	Confer with Committee member re: prepare for bi-weekly meeting with Committee	0.60	\$696.00
B150	09/04/25	BIW	Confer with BRG and Stout re: prepare for bi-weekly meeting with Committee	0.50	\$580.00
B150	09/04/25	BIW	Confer with Committee member re: prepare for bi-weekly meeting with Committee	1.10	\$1,276.00
B150	09/04/25	BIW	Confer with Committee member re: status of case and questions on September 9th hearing	1.20	\$1,392.00
B150	09/04/25	BIW	Confer with counsel for Committee member re: prepare for bi-weekly meeting with Committee	0.60	\$696.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	09/04/25	JDP	Call with committee member and SCC re: settlement offer and response	0.80	\$1,096.00
B150	09/05/25	BIW	Confer with Committee member re: debrief on bi-weekly meeting with Committee	0.70	\$812.00
B150	09/05/25	BIW	Prepare for bi-weekly call with Committee re: mediation	1.20	\$1,392.00
B150	09/05/25	BIW	Participate in bi-weekly call with Committee	2.40	\$2,784.00
B150	09/05/25	BIW	Confer with Committee member re: prepare for bi-weekly meeting with Committee	0.70	\$812.00
B150	09/05/25	BIW	Confer with counsel for Committee member re: prepare for bi-weekly meeting with Committee	0.40	\$464.00
B150	09/05/25	JDP	Prepare for (.7) and participate in (2.4) committee update call re: mediation/counter offer	3.10	\$4,247.00
B150	09/07/25	BIW	Draft emails to Committee re: analysis of potential settlement proposals	0.20	\$232.00
B150	09/07/25	BIW	Confer with counsel for Committee member re: anticipated settlement offer	0.60	\$696.00
B150	09/08/25	BIW	Confer with Committee member re: debrief on Committee call	0.60	\$696.00
B150	09/08/25	BIW	Prepare for call with Committee re: settlement analyses	0.80	\$928.00
B150	09/08/25	BIW	Participate in call with Committee re: settlement analyses	1.60	\$1,856.00
B150	09/08/25	JDP	Prepare for (1.0) and participate in (1.6) committee call re: submission of counter-offer	2.60	\$3,562.00
B150	09/09/25	BIW	Draft email to Committee re: debrief on Status Conference, CCSS Motion and Dismissal Motion	0.70	\$812.00
B150	09/09/25	BIW	Draft email to counsel for Survivor re: respond to inquiry on status of case	0.30	\$348.00
B150	09/09/25	JDP	Review and edit draft email to committee re: status conference and CCSS divestiture hearing	0.40	\$548.00
B150	09/10/25	BIW	Draft email to Committee re: scheduling of meetings in preparation for mediation	0.20	\$232.00
B150	09/10/25	BIW	Confer with counsel for Committee member re: prepare for mediation	0.70	\$812.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	09/10/25	BIW	Confer with counsel for Committee member re: status of mediation	0.60	\$696.00
B150	09/10/25	BIW	Confer with counsel for Committee member re: status of mediation	0.40	\$464.00
B150	09/11/25	BIW	Confer with counsel for Committee member re: mediation strategy (1 @ .4 and 1 @ .3)	0.70	\$812.00
B150	09/11/25	BIW	Confer with counsel for Committee member re: prepare for call among counsel to Committee members	0.40	\$464.00
B150	09/11/25	BIW	Participate in call with counsel for Committee members re: debrief on recent developments	1.10	\$1,276.00
B150	09/11/25	JDP	Prepare for (.5) and participate in (1.1) SCC update call re: status conference result and upcoming mediation	1.50	\$2,055.00
B150	09/12/25	BIW	Participate in call with Committee re: mediation preparation	0.80	\$928.00
B150	09/12/25	BIW	Draft email to Committee re: reminder of upcoming call	0.10	\$116.00
B150	09/12/25	BIW	Confer with Survivor re: questions about proposed dismissal	0.20	\$232.00
B150	09/12/25	BIW	Draft email to Committee member re: respond to inquiry on upcoming meeting	0.20	\$232.00
B150	09/12/25	BIW	Confer with counsel for Committee member re: prepare for upcoming Committee meeting	0.20	\$232.00
B150	09/12/25	JDP	Prepare for (.6) and participate in (.8) call with committee re: status conference and mediation position	1.40	\$1,918.00
B150	09/15/25	BIW	Confer with Survivor re: questions about proposed dismissal	0.30	\$348.00
B150	09/15/25	BIW	Draft email to counsel for Survivor re: explain how to withdraw Abuse Claim	0.20	\$232.00
B150	09/16/25	BIW	Confer with Survivor re: questions about proposed dismissal	0.40	\$464.00
B150	09/17/25	BIW	Confer with counsel for Survivor re: questions about proposed dismissal	0.40	\$464.00
B150	09/18/25	BIW	Confer with counsel for Survivor re: questions about proposed dismissal	0.60	\$696.00
B150	09/18/25	BIW	Draft email to Committee re: notification of mediation sessions	0.20	\$232.00
B150	09/19/25	BIW	Draft reply email to Committee member re: attendance at mediation sessions	0.20	\$232.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B150	09/19/25	BIW	Confer with counsel for Survivor re: questions about proposed dismissal	0.30	\$348.00
B150	09/19/25	BIW	Draft email to Committee re: summarize final Dismissal Motion and Debtor's Status Conference Report	0.40	\$464.00
B150	09/22/25	BIW	Draft responsive email to Committee re: attendance at mediation	0.30	\$348.00
B150	09/22/25	BIW	Draft email to Committee re: debrief on Status Conference	0.30	\$348.00
B150	09/22/25	BIW	Confer with Committee member re: status of mediation and path ahead	0.40	\$464.00
B150	09/22/25	BIW	Confer with Survivor re: status of mediation and path ahead	0.40	\$464.00
B150	09/22/25	BIW	Draft response to party in interest inquiry re: Bishop's recent announcement on Debtor's financial distress	0.30	\$348.00
B150	09/23/25	BIW	Draft response to party in interest inquiry re: Debtor's motion to dismiss	0.30	\$348.00
B150	09/23/25	BIW	Confer with Survivor re: status of mediation and path ahead	0.40	\$464.00
B150	09/24/25	BIW	Draft several emails to Survivor responding to his inquiries	0.40	\$464.00
B150	09/26/25	BIW	Draft responsive email to counsel for Committee member re: analysis of Debtor owned real estate	0.80	\$928.00
B150	09/26/25	BIW	Confer with creditor re: respond to questions about case dismissal	0.40	\$464.00
B150	09/29/25	BIW	Draft responsive email to Survivor's counsel re: mediation attendance	0.20	\$232.00
B150	09/29/25	BIW	Draft email to Co-Chairs of Committee re: agenda for call later in the week (.1); respond to question on same (.1)	0.20	\$232.00
Total B150 - Meetings of and Communication with Creditors				41.90	\$50,662.00

B155 Mediation

B155	09/02/25	BIW	Refine Committee Presentation re: settlement ranges	1.10	\$1,276.00
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Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	09/02/25	BIW	Participate in call with Burns Bair re: terms of acceptable Insurance assignment	0.60	\$696.00
B155	09/02/25	JDP	Prepare for and participate in call with T. Schiovone re: insurance issues in proposed settlement	0.40	\$548.00
B155	09/02/25	JDP	Call with co-counsel re: settlement proposal to insurers	0.60	\$822.00
B155	09/02/25	JDP	Call with BRG re: revised settlement proposal	0.50	\$685.00
B155	09/03/25	BIW	Confer with Mediator re: status of case	0.50	\$580.00
B155	09/03/25	JDP	Review debtor's settlement letter, draft response and prepare for conversation with A. Uetz re: same	1.60	\$2,192.00
B155	09/03/25	JDP	Participate in call with Judge Sontchi re: debtor's offer and response	0.50	\$685.00
B155	09/04/25	BIW	Revise and refine Settlement Range Presentation to Committee	0.60	\$696.00
B155	09/04/25	BIW	Confer with Mediator re: respond to inquiry on attendance at mediation	0.40	\$464.00
B155	09/04/25	JDP	Calls with A. Uetz re: settlement offer and response	0.70	\$959.00
B155	09/05/25	BIW	Refine mediation strategy	1.20	\$1,392.00
B155	09/06/25	BIW	Review and revise Term Sheet re: Insurance Provisions	1.10	\$1,276.00
B155	09/06/25	BIW	Review and revise letter responding to Debtor's August 25th Letter	0.90	\$1,044.00
B155	09/06/25	JDP	Draft response to Debtor's August 25 offer letter; review and revise same	2.40	\$3,288.00
B155	09/06/25	JDP	Draft letter to mediators with counter offer to Debtor's August 25 offer letter; review and revise same	1.70	\$2,329.00
B155	09/07/25	BIW	Further revise letter to Court re: Status Update in advance of September 9th Status Conference	0.30	\$348.00
B155	09/07/25	BIW	Further review and revise letter responding to Debtor's August 25th Letter	0.40	\$464.00
B155	09/07/25	BIW	Further review and revise Term Sheet re: Insurance Provisions	0.50	\$580.00
B155	09/07/25	BIW	Draft email to Mediators re: Committee's proposed settlement offer	0.10	\$116.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	09/07/25	BIW	Draft email to Debtor's counsel re: response to August 25th letter	0.10	\$116.00
B155	09/08/25	BIW	Review and revise letter responding to Debtor's August 25th Letter and letter to Mediators	0.40	\$464.00
B155	09/08/25	JDP	Review and edit draft response to A. Uetz re: settlement, letter to mediators re: counter-offer and letters re: mediation, and letter to court re: status conference	1.60	\$2,192.00
B155	09/09/25	BIW	Confer with counsel for Survivor re: setting of mediation dates and attendance	0.40	\$464.00
B155	09/09/25	BIW	Confer with Mediator re: setting of mediation dates	0.50	\$580.00
B155	09/09/25	JDP	Review and edit draft mediation deck	0.80	\$1,096.00
B155	09/10/25	BIW	Confer with Mediator re: proposed mediation dates	0.40	\$464.00
B155	09/10/25	BIW	Confer with T. Burns re: mediation preparation	0.30	\$348.00
B155	09/10/25	BIW	Revise mediation strategy	0.60	\$696.00
B155	09/10/25	BIW	Revise mediation presentation	0.80	\$928.00
B155	09/10/25	JDP	Review and edit mediation deck	1.20	\$1,644.00
B155	09/11/25	BIW	Confer with Mediator re: proposed date and structure of mediation	0.30	\$348.00
B155	09/11/25	BIW	Confer with Mediator re: proposed mediation dates (2 @ .2 each)	0.40	\$464.00
B155	09/12/25	BIW	Confer with Mediator re: proposed date and structure of mediation	0.50	\$580.00
B155	09/12/25	BIW	Confer with Mediator re: Insurer side mediation issues	0.40	\$464.00
B155	09/12/25	JDP	Participate in calls with Judge Sontchi re: mediation	1.20	\$1,644.00
B155	09/12/25	JDP	Develop mediation strategy	0.70	\$959.00
B155	09/15/25	BIW	Confer with Mediator re: proposed date and structure of mediation	0.10	\$116.00
B155	09/15/25	BIW	Confer with T. Burns and J. Bair re: Insurer side mediation issues	0.20	\$232.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	09/16/25	JDP	Review and update settlement model	1.10	\$1,507.00
B155	09/16/25	JDP	Review and respond to emails scheduling mediation for 10/7 and 10/8	0.20	\$274.00
B155	09/17/25	BIW	Review potential insurance assignment provisions to be included in consensual plan	0.80	\$928.00
B155	09/17/25	BIW	Review most recent draft of Child Protection Protocols	0.60	\$696.00
B155	09/17/25	JDP	Review and respond to e-mails re: scheduling in-person mediation sessions	0.30	\$411.00
B155	09/18/25	BIW	Review potential insurance assignment provisions to be included in consensual plan	0.80	\$928.00
B155	09/18/25	JDP	Prepare for Oct 7 and 8 mediation sessions	0.30	\$411.00
B155	09/19/25	JDP	Develop mediation strategy	1.20	\$1,644.00
B155	09/22/25	BIW	Confer with Mediator re: scheduling of mediation sessions	0.10	\$116.00
B155	09/22/25	BIW	Re-confer with Mediator re: scheduling of mediation sessions	0.30	\$348.00
B155	09/23/25	BIW	Confer with Mediator re: expectations at upcoming mediation sessions	0.40	\$464.00
B155	09/25/25	BIW	Confer with T. Burns re: mediation preparation	0.40	\$464.00
B155	09/25/25	BIW	Confer with Mediator re: prepare for mediation	0.50	\$580.00
B155	09/25/25	BIW	Refine mediation strategy	0.30	\$348.00
B155	09/25/25	JDP	Call with Judge Sontchi re: mediation	0.50	\$685.00
B155	09/29/25	BIW	Confer with Mediator re: structure of upcoming mediation sessions	0.20	\$232.00
B155	09/29/25	BIW	Confer with counsel for Committee member re: mediation preparation	0.30	\$348.00
B155	09/29/25	BIW	Confer with J. Prol re: Mediator's settlement proposal concept	0.20	\$232.00
B155	09/29/25	JDP	Review mediator's proposal re: bands; develop position; confer with SCC re: same	0.80	\$1,096.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B155	09/29/25	JDP	Review email from Judge Sontchi re: potential for mediator's bracket proposal (.2); develop position (.3); confer with B. Weisenberg re: same (.2)	0.70	\$959.00
B155	09/30/25	BIW	Confer with Committee member re: mediation preparation	0.40	\$464.00
B155	09/30/25	BIW	Develop response to Mediator's settlement proposal concept	0.20	\$232.00
B155	09/30/25	BIW	Confer with Mediator re: structure of upcoming mediation sessions	0.10	\$116.00
B155	09/30/25	JDP	Develop position re: mediator's band proposal and draft response	0.50	\$685.00
Total B155 - Mediation				38.20	\$48,407.00

B160 Fee/Employment Applications

B160	09/05/25	DC	Update fee application status chart	0.20	\$80.00
B160	09/18/25	DC	Reconcile fees received and update fee application status chart	0.20	\$80.00
B160	09/29/25	DC	Draft LS' August 2025 Monthly Fee Statement with exhibits	0.30	\$120.00
B160	09/29/25	DC	Emails with attorney group re: coordination, timing and strategy for filing interim fee application	0.30	\$120.00
Total B160 - Fee/Employment Applications				1.00	\$400.00

B165 Employment and Retention Applications - Others

B165	09/05/25	LHS	Review stipulation and proposed order approving CU retention by debtor and compare against VeraCruz retention order (.5); revise CU retention objection and send revised version and redlines internally (.3); review terms of proposed payment structure in retention application for purposes of revising proposed order (.2); review response from B. Weisenberg (.1)	1.10	\$1,160.50
B165	09/06/25	BIW	Draft email to S. Moses re: agreed upon terms of real estate broker retention	0.20	\$232.00
B165	09/06/25	LHS	Review response from J. Prol re: stipulation and CU retention order	0.10	\$105.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B165	09/07/25	BIW	Draft email to S. Moses re: Stipulation setting forth terms of real estate broker retention	0.20	\$232.00
Total B165 - Employment and Retention Applications - Others				1.60	\$1,730.00
<u>B175 Fee Applications and Invoices - Others</u>					
B175	09/02/25	BIW	Review Debtor professional July MFSs	0.40	\$464.00
B175	09/25/25	BIW	Comment on Stout August MFS	0.20	\$232.00
Total B175 - Fee Applications and Invoices - Others				0.60	\$696.00
<u>B185 Assumption/Rejection of Leases and Contracts</u>					
B185	09/18/25	BIW	Review Debtor's draft motion to extend time to assume or reject lease (.2); draft email to S. Moses re: same (.1)	0.30	\$348.00
B185	09/19/25	BIW	Review motion to extend time to assume or reject lease and related pleadings	0.40	\$464.00
Total B185 - Assumption/Rejection of Leases and Contracts				0.70	\$812.00
<u>B190 Other Contested Matters (excluding assumption/rejection motions)</u>					
B190	09/09/25	CMR	Summary review of Debtors' Motion to Dismiss	0.20	\$225.00
B190	09/10/25	BIW	Review research and case law on dismissal	0.90	\$1,044.00
B190	09/10/25	BIW	Review Debtor's Dismissal Motion	0.40	\$464.00
B190	09/10/25	PJG	Confer with B. Weisenberg and detailed research re: dismissal standards and with prejudice and review and analyze cases re: same	3.80	\$4,161.00
B190	09/10/25	PJG	Draft memorandum re: dismissal with and without prejudice	3.30	\$3,613.50
B190	09/11/25	BIW	Draft email to Survivor re: respond to inquiry about Dismissal Motion	0.20	\$232.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B190	09/11/25	BIW	Begin drafting Response to Debtor's Dismissal Motion	1.80	\$2,088.00
B190	09/11/25	BIW	Research Rule 11 and related rules	0.70	\$812.00
B190	09/11/25	BIW	Review case law on chapter 11 case dismissal	0.90	\$1,044.00
B190	09/11/25	LHS	Conduct preliminary research re: case dismissal	1.60	\$1,688.00
B190	09/11/25	PJG	Research re: 1112 dismissal standards and future refiling issues	1.80	\$1,971.00
B190	09/12/25	BIW	Continue drafting Response to Debtor's Dismissal Motion	1.70	\$1,972.00
B190	09/12/25	BIW	Confer with P. Gross re: insert to Response to Dismissal Motion	0.50	\$580.00
B190	09/12/25	LHS	Continue research and analysis re: case dismissal issues	0.60	\$633.00
B190	09/12/25	PJG	Zoom meeting with B. Weisenberg re: dismissal motion	0.50	\$547.50
B190	09/12/25	PJG	Additional research re: dismissal motion and 349(a) dismissal standards with and without prejudice	3.70	\$4,051.50
B190	09/12/25	PJG	Review factual background pleadings and documents for arguments and facts in support of dismissal with prejudice/bad faith dismissal arguments under 1112 and 349(a) of the Bankruptcy Code (1.3); begin drafting legal standards for objection brief re: dismissal (1.1)	2.40	\$2,628.00
B190	09/15/25	BIW	Draft response to Debtor's Dismissal Motion	2.70	\$3,132.00
B190	09/15/25	BIW	Continue drafting response to Debtor's Dismissal Motion	1.80	\$2,088.00
B190	09/15/25	BIW	Revise insert to response to Dismissal Motion	0.70	\$812.00
B190	09/15/25	JDP	Review and direct research on response to motion to dismiss	0.50	\$685.00
B190	09/15/25	LHS	Continue research re: motion to dismiss	2.00	\$2,110.00
B190	09/15/25	PJG	Further follow up research re: relevant cases approving dismissal with prejudice	2.60	\$2,847.00
B190	09/15/25	PJG	Draft legal argument sections of brief in response to motion to dismiss	4.60	\$5,037.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B190	09/15/25	PJG	Review draft fact sections re: Committee brief re: dismissal (.3), edit and revise brief and update to include legal arguments re: dismissal with prejudice (.5) and email with B. Weisenberg re: same (.1)	0.90	\$985.50
B190	09/16/25	BIW	Revise response to Debtor's Dismissal Motion	1.70	\$1,972.00
B190	09/16/25	JDP	Review and edit response to Debtor's motion to dismiss	1.40	\$1,918.00
B190	09/16/25	LHS	Conduct additional research on pro hac vice admissions, local rules, and annotate transcripts and pleadings	2.00	\$2,110.00
B190	09/17/25	BIW	Revise response to Debtor's Dismissal Motion	0.40	\$464.00
B190	09/17/25	BIW	Further revise response to Debtor's Dismissal Motion	0.70	\$812.00
B190	09/17/25	JDP	Review and comment on sanctions research	0.40	\$548.00
B190	09/17/25	JDP	Review and edit draft response to motion to dismiss bankruptcy case	2.20	\$3,014.00
B190	09/18/25	BIW	Review research on Rule 11 sanctions	0.90	\$1,044.00
B190	09/18/25	BIW	Finalize response to Debtor's Dismissal Motion	1.20	\$1,392.00
B190	09/18/25	JDP	Review and edit response to Debtor's motion to dismiss; review research and cases cited	3.20	\$4,384.00
B190	09/18/25	LHS	Review additional transcript, analyze privilege issues	1.70	\$1,793.50
B190	09/19/25	BIW	Finalize Statement in Support of Debtor's Dismissal Motion	0.90	\$1,044.00
B190	09/19/25	BIW	Review Debtor's Status Conference Report	0.20	\$232.00
B190	09/19/25	JDP	Final review and edits to Committee response to Debtor motion to dismiss	1.60	\$2,192.00
B190	09/19/25	LHS	Conduct additional research re: mediation local rules and confidentiality and add to memo	4.50	\$4,747.50
B190	09/25/25	PJG	Research re: situations involving voluntary dismissal and varying standards re: with prejudice dismissal, related bad faith issues	5.10	\$5,584.50
B190	09/26/25	JDP	Review research for reply brief on motion to dismiss	1.20	\$1,644.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B190	09/29/25	BIW	Draft email to T. Burns re: response to Debtor's letter requesting identity of defense counsel to Insurers	0.20	\$232.00
B190	09/30/25	BIW	Confer with T. Burns re: status of mediation with Insurers	0.20	\$232.00
Total B190 - Other Contested Matters (excluding assumption/rejection motions)				70.50	\$80,810.50

B200 - Operations

B210 Business Operations

B210	09/22/25	BIW	Review August MOR	0.40	\$464.00
Total B210 - Business Operations				0.40	\$464.00

B400 - Bankruptcy-Related Advice

B430 Adversary Proceedings and Bankruptcy Court Litigation

B430	09/02/25	AMG	Draft responses and objections to Debtor's discovery requests	2.30	\$1,644.50
B430	09/02/25	CMR	Review and revise Reply in Support of Motion for Reconsideration (.3); Confer with LS Team and G. Albert re: same (.2)	0.50	\$562.50
B430	09/02/25	JDP	Review and comment on draft reply in further support of motion for reconsideration	0.30	\$411.00
B430	09/02/25	JDP	Review and comment on reply in support of motion for reconsideration of order dismissing sub con adversary proceeding	0.40	\$548.00
B430	09/03/25	AMG	Draft responses and objections to Debtor's discovery requests	3.10	\$2,216.50
B430	09/04/25	AMG	Draft responses and objections to Debtor's discovery requests	1.10	\$786.50
B430	09/04/25	CMR	Review and revise responses to Debtor Discovery Requests	0.90	\$1,012.50
B430	09/04/25	MAK	Review and analyze restricted asset discovery to prepare responses to debtor discovery demands	2.20	\$2,497.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430	09/05/25	AMG	Revise responses and objections to Debtor's discovery requests	1.30	\$929.50
B430	09/05/25	CMR	Review and revise Responses and Objections to Discovery Requests	0.20	\$225.00
B430	09/05/25	MAK	Review and revise discovery responses to RCBO discovery	1.80	\$2,043.00
B430	09/06/25	MAK	Review and revise discovery responses to RCBO discovery	0.80	\$908.00
B430	09/08/25	MAK	Prepare for oral argument on motion to reconsider	2.40	\$2,724.00
B430	09/11/25	AMG	Revise, proof, and finalize responses and objections to Debtor's discovery requests	2.50	\$1,787.50
B430	09/11/25	CMR	Review and revise Responses and Objections to Discovery Responses	0.20	\$225.00
B430	09/12/25	CMR	Finalize (.2) and serve (.1) Responses and Objections to Discovery Requests	0.30	\$337.50
B430	09/15/25	CMR	Summary review Debtors' Responses and Objections to Discovery Requests	0.40	\$450.00
B430	09/17/25	LHS	Work on additional research, transcript review, and memo	4.00	\$4,220.00
B430	09/19/25	CMR	Confer re: adjournment of deadlines re: Adversary Proceeding	0.10	\$112.50
Total B430 - Adversary Proceedings and Bankruptcy Court Litigation				24.80	\$23,640.50

B430A Court Hearings

B430A	09/04/25	BIW	Draft letter to Court re: Status Report in advance on September 9th hearing	1.10	\$1,276.00
B430A	09/05/25	BIW	Revise letter to Court re: Status Report in advance on September 9th hearing	0.40	\$464.00
B430A	09/06/25	BIW	Revise letter to Court re: Status Update in advance of September 9th Status Conference	0.60	\$696.00
B430A	09/06/25	JDP	Review and edit status report to Court for 9/9 status conference	1.60	\$2,192.00
B430A	09/07/25	BIW	Confer with G. Albert re: prepare for September 9th Status Conference	0.30	\$348.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430A	09/08/25	BIW	Prepare for CCSS Motion hearing	0.90	\$1,044.00
B430A	09/08/25	BIW	Continue to prepare for CCSS Motion hearing	1.80	\$2,088.00
B430A	09/08/25	DC	Prepare Binder for 9/9/25 Court Hearing on Debtor's CCCS Motion	0.70	\$280.00
B430A	09/09/25	BIW	Attend September 9th Status Conference and CCSS Motion hearing	3.00	\$3,480.00
B430A	09/09/25	BIW	Prepare for Status Conference and CCSS Motion hearing	1.10	\$1,276.00
B430A	09/09/25	JDP	Prepare for (1.6) and participate in (3.0) status conference and hearing on CCSS divestiture motion	4.60	\$6,302.00
B430A	09/09/25	MAK	Prepare for oral argument on motion to reconsider	1.20	\$1,362.00
B430A	09/09/25	MAK	Attend status conference and motion for reconsideration hearing	2.00	\$2,270.00
B430A	09/20/25	JDP	Review Debtor's status conference report and prepare for status conference	0.60	\$822.00
B430A	09/22/25	BIW	Attend Status Conference virtually	0.50	\$580.00
B430A	09/22/25	JDP	Prepare for (.2) and participate in (.5) status conference before Judge Lafferty	0.70	\$959.00
B430A	09/22/25	JDP	Prepare for status conference before Judge Lafferty	0.40	\$548.00
Total B430A - Court Hearings				21.50	<u>\$25,987.00</u>

B430B Appeals

B430B	09/02/25	CMR	Confer with G. Albert re: letter re: Consolidation Order	0.10	\$112.50
B430B	09/04/25	CMR	Analyze issues (.1) and confer with LS Team (.1) re: Counterstatement of Issues on Appeal	0.20	\$225.00
B430B	09/05/25	CMR	Finalize Counterstatement of Issues and Designation of Record on Appeal	0.20	\$225.00
B430B	09/12/25	BIW	Review Appellants' Opening Brief	0.50	\$580.00
B430B	09/12/25	CMR	Summary review of Appellant's Opening Brief	1.10	\$1,237.50

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B430B	09/15/25	BIW	Further review of Appellants' Opening Brief	0.30	\$348.00
B430B	09/24/25	BIW	Review and revise Lift Stay appellate brief	0.30	\$348.00
B430B	09/24/25	BIW	Review and revise Lift Stay appellate brief	1.40	\$1,624.00
B430B	09/24/25	JDP	Review statement of issues on appeal and insurers' opening brief; review and comment on draft response	1.60	\$2,192.00
B430B	09/26/25	JDP	Review and comment on revised draft of response to Insurers' appeal of lift stay order	1.20	\$1,644.00
B430B	09/27/25	BIW	Review revised draft of Lift Stay Appeal Brief and revise same	1.20	\$1,392.00
Total B430B - Appeals				8.10	\$9,928.00
<u>B460 Other - Insurance Matters</u>					
B460	09/17/25	JDP	Review New Orleans plan insurance assignment provisions	0.80	\$1,096.00
Total B460 - Other - Insurance Matters				0.80	\$1,096.00

Timekeeper Summary (by Task):

Task	Task Description	Hours	Fees
B110	Case Administration	1.90	\$760.00
B130	Asset Disposition	31.20	\$30,826.00
B150	Meetings of and Communication with Creditors	41.90	\$50,662.00
B155	Mediation	38.20	\$48,407.00
B160	Fee/Employment Applications	1.00	\$400.00
B165	Employment and Retention Applications - Others	1.60	\$1,730.00
B175	Fee Applications and Invoices - Others	0.60	\$696.00
B185	Assumption/Rejection of Leases and Contracts	0.70	\$812.00
B190	Other Contested Matters (excluding assumption/rejection motions)	70.50	\$80,810.50
B210	Business Operations	0.40	\$464.00
B430	Adversary Proceedings and Bankruptcy Court Litigation	24.80	\$23,640.50
B430A	Court Hearings	21.50	\$25,987.00
B430B	Appeals	8.10	\$9,928.00
B460	Other - Insurance Matters	0.80	\$1,096.00
	Total	243.20	\$276,219.00

EXHIBIT B

Actual and necessary disbursements incurred by Lowenstein Sandler LLP

II. Summary of Disbursement Charges

	\$570.24
Computerized legal research	\$4,069.52
Travel	\$3,417.45
Meals	<u>\$59.14</u>
Total Disbursements	<u><u>\$8,116.35</u></u>

The above charges are based upon time and expense records available on or about the date of the attached letter. Such records are believed in good faith to be accurate and substantially up to date, but there may be fees and expenses that have not been processed as of such date which Lowenstein Sandler LLP may submit in the future. Lowenstein Sandler LLP reserves the right to amend this monthly statement at a later date.

DISBURSEMENT DETAIL:

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/29/25	eDiscovery Review VENDOR: Relativity DATE:2025-09-29 105.60 GB eDiscovery Review	\$570.24
09/09/25	Meals (local) VENDOR: Weisenberg, Brent I. INVOICE#: 7668152809150204 DATE: 09/09/25; Lunch before flight to EWR after attendance at Status Conference and CCSS Motion	\$24.00
09/09/25	Meals (local) VENDOR: Weisenberg, Brent I. INVOICE#: 7668152809150204 DATE: 09/09/25; Breakfast before attendance at Status Conference and CCSS Motion	\$17.64
09/10/25	Meals (out of town travel) VENDOR: Prol, Jeffrey D. INVOICE#: 7678297509170201 DATE: 09/10/25; Dinner at hotel while attending Status Conference in CA	\$17.50
09/08/25	Travel - Accommodations VENDOR: Weisenberg, Brent I. INVOICE#: 7668152809150204 DATE: 09/08/25; Hotel stay for attendance at Status Conference and CCSS Motion	\$318.41
09/10/25	Travel - Accommodations VENDOR: Prol, Jeffrey D. INVOICE#: 7678297509170201 DATE: 09/10/25; Hotel while attending Status Conference in CA	\$509.18
09/08/25	Travel - Airfare VENDOR: Prol, Jeffrey D. INVOICE#: 7678297509170201 DATE: 09/08/25; Wi-Fi on flight to attend Status Conference in CA	\$8.00
09/08/25	Travel - Airfare VENDOR: Weisenberg, Brent I. INVOICE#: 7668152809150204 DATE: 09/08/25; Wi-Fi during flight to San Francisco for attendance at Status Conference and CCSS Motion	\$8.00
09/09/25	Travel - Airfare VENDOR: Weisenberg, Brent I. INVOICE#: 7668152809150204 DATE: 09/09/25; Wi-Fi during flight to EWR after attendance at Status Conference and CCSS Motion	\$8.00
09/18/25	Travel - Airfare VENDOR: Prol, Jeffrey D. INVOICE#: 7735206510150206 DATE: 09/18/25; Airfare; Flight from Portland, ME to Los Angeles, CA to attend mediation	\$1,470.22
09/10/25	Out of town ground travel (mileage, taxi, tolls etc...) VENDOR: Prol, Jeffrey D. INVOICE#: 7678297509170201 DATE: 09/10/25; Uber from hotel to airport while attending Status Conference in CA	\$193.13
09/04/25	Local Travel VENDOR: Prol, Jeffrey D. INVOICE#: 7678297509170201 DATE: 09/04/25; Car service from home to Newark Airport to attend Status Conference in CA	\$174.25
09/08/25	Local Travel VENDOR: Weisenberg, Brent I. INVOICE#: 7668152809150204 DATE: 09/08/25; Uber from SFO to Oakland Marriott (with Jeff Prol) for attendance at Status Conference and CCSS Motion	\$230.08
09/08/25	Local Travel VENDOR: Weisenberg, Brent I. INVOICE#: 7668152809150204 DATE: 09/08/25; Uber from Home to EWR for attendance at Status Conference and CCSS Motion	\$76.91
09/09/25	Local Travel VENDOR: Weisenberg, Brent I. INVOICE#: 7668152809150204 DATE: 09/09/25; Uber from Oakland to SFO after attendance at Status Conference and CCSS Motion	\$98.86
09/10/25	Local Travel VENDOR: Prol, Jeffrey D. INVOICE#: 7678297509170201 DATE: 09/10/25; Car service from Newark Airport to home to attend Status Conference in CA	\$163.05
09/30/25	Local Travel VENDOR: Prol, Jeffrey D. INVOICE#: 7735206510150206 DATE: 09/30/25; Car from home to Newark airport while attending mediation in LA	\$159.36
09/15/25	Computerized legal research: Westlaw: User Name: SKLAR,LINDSAY / Duration of Search: 00:00 / Transaction:	\$753.59

11 / Docs/Lines: 0		
09/16/25	Computerized legal research: Westlaw: User Name: SKLAR,LINDSAY / Duration of Search: 00:00 / Transaction: 13 / Docs/Lines: 0	\$376.80
09/17/25	Computerized legal research: Westlaw: User Name: SKLAR,LINDSAY / Duration of Search: 00:00 / Transaction: 11 / Docs/Lines: 0	\$1,112.09
09/19/25	Computerized legal research: Westlaw: User Name: SKLAR,LINDSAY / Duration of Search: 00:00 / Transaction: 25 / Docs/Lines: 0	\$515.20
09/01/25	Computerized legal research: Westlaw: User Name: DANIEL,KATHRYN / Duration of Search: 00:00 / Transaction: 33 / Docs/Lines: 0	\$1,210.94
07/24/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212378-Q32025 DATE: 10/13/2025 Date: 07/24/2025 Court: DEBK Pages: 67	\$6.70
07/10/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 3212378-Q32025 DATE: 10/13/2025 Date: 07/10/2025 Court: MIEBK Pages: 256	\$25.60
08/27/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586594-Q32025 DATE: 10/13/2025 Date: 08/27/2025 Court: NJBK Pages: 35	\$3.50
07/07/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 07/07/2025 Court: CAEBK Pages: 165	\$16.50
07/08/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 07/08/2025 Court: CAEBK Pages: 11	\$1.10
07/11/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 07/11/2025 Court: CANBK Pages: 30	\$3.00
07/27/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 07/27/2025 Court: CANBK Pages: 4	\$0.40
07/11/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 07/11/2025 Court: CANBK Pages: 121	\$12.10
08/04/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 08/04/2025 Court: CANBK Pages: 123	\$12.30
08/28/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 08/28/2025 Court: CANDC Pages: 2	\$0.20
07/11/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 07/11/2025 Court: NYSBK Pages: 4	\$0.40
07/01/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 07/01/2025 Court: CANBK Pages: 142	\$14.20
08/25/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 08/25/2025 Court: CANBK Pages: 23	\$2.30
07/01/25	Computerized legal research: Pacer: VENDOR: Pacer Service Center INVOICE#: 4586608-Q32025 DATE: 10/13/2025 Date: 07/01/2025 Court: CANDC Pages: 26	\$2.60
Total Disbursements		<hr/> \$8,116.35 <hr/>