1	FOLEY & LARDNER LLP	
2	Tel: <u>(415)</u> 438-6469; <u>eridley@foley.com</u>	
3	Tel: (415) 438-6404; smoses@foley.com	
4	Ann Marie Uetz (admitted <i>pro hac vice</i> )	
5	Matthew D. Lee (admitted <i>pro hac vice</i> )	
	Geoffrey S. Goodman (admitted <i>pro hac vice</i> )	
6	Mark C. Moore (admitted <i>pro hac vice</i> )	
7	Tel: (214) 999-4150; mmoore@foley.com One Market Plaza	
8	55 Spear Street Tower, Suite 1900 San Francisco, CA 94105	
9		
10	and Debtor in Possession	
11	IINITED STATES	DANKDIIDTOV COUDT
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14	OAKLA	n R. Ridley (CA Bar No. 151735) 415) 438-6469; eridley@foley.com 1. Moses (CA Bar No. 250533) 415) 438-6404; smoses@foley.com Marie Uetz (admitted pro hac vice) 313) 234-7114; auetz@foley.com ew D. Lee (admitted pro hac vice) 608) 258-4203; mdlee@foley.com rey S. Goodman (admitted pro hac vice) 312) 832-4515; ggoodman@foley.com C. Moore (admitted pro hac vice) 214) 999-4150; mmoore@foley.com Market Plaza ear Street Tower, Suite 1900 rancisco, CA 94105  sel for the Debtor hebtor in Possession  UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION  Case No. 23-40523 WJL
15	In re:	Case No. 23-40523 WJL
16	THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole	Chapter 11
17	•	
	Debiol.	AS GENERAL BANKRUPTCY COUNSEL TÓ
18		PAYMENT OF COMPENSATION AND
19		PERIOD OF OCTOBER 1, 2025 THROUGH
20		OCTOBER 31, 2025
21		Judge: Hon. William J. Lafferty
22   23		
		[No Hearing Requested]
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Name of Applicant:	Foley & Lardner LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Effective as of May 8, 2023 by Order entered June 15, 2023 [Dkt. No. 145]
Period for Which Compensation and Reimbursement is Sought:	October 1, 2025 –October 31, 2025
Amount of Compensation Sought as Actual, Reasonable and Necessary: <sup>1</sup>	\$634,350.50
20% Holdback:	\$126,870.10
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: <sup>2</sup>	\$18,636.43
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought:	\$526,116.83

#### PRELIMINARY STATEMENT

On May 8, 2023 (the "Petition Date"), The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO")<sup>3</sup> commenced the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or the "Bankruptcy Case"). The Debtor continues to operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in this Chapter 11 Case.

On May 23, 2023, the Debtor filed the 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 [Dkt. No. 60] (the "Retention Application"). The Court approved the Retention Application on June 15, 2023, entering the Order Approving Debtor's

TWENTY NINTH MONTHLY FEE STATEMENT OF FOLEY & LARDNER LLP

Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 2 of Case: 23-40523 60

4896-4301-4012.1

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<sup>&</sup>lt;sup>1</sup> Foley & Lardner LLP has agreed not to 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 Monthly Fee Statement.

<sup>&</sup>lt;sup>2</sup> Foley & Lardner LLP has agreed not to bill the Debtor for the expenses for its attorneys to travel to or from the Bay Area, in connection with this Chapter 11 Case, and such amounts are not included in this Monthly Fee Statement.

<sup>&</sup>lt;sup>3</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Orders (defined below).

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 [Dkt. No. 145] (the "Foley Retention Order").

Also on May 23, 2023, the Office of the United States Trustee filed its notice of appointment of an Official Committee of Unsecured Creditors [Dkt. No. 58].

On May 26, 2023, the Debtor filed the Debtor's Motion for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 70] (the "Compensation Procedures Motion"). The Court granted the Compensation Procedures Motion on June 23, 2023, entering the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 170] (the "Original Compensation Procedures Order"). The Court entered its Agreed Order Amending Procedures for Interim Compensation and Reimbursement of Expenses of Professionals on June 27, 2025 [Dkt. No. 2101] (the "Amended Compensation Procedures Order" and collectively with the Original Compensation Procedures Order, the "Compensation Procedures Orders").

Foley & Lardner LLP ("Foley" or "Applicant"), as general bankruptcy counsel to the Debtor, hereby submits its twenty ninth monthly fee statement (the "Monthly Fee Statement") for allowance of payment of compensation for professional services rendered and for reimbursement of actual and necessary expenses incurred for the period commencing October 1, 2025 through and including October 31, 2025 (the "Fee Period") pursuant to the Compensation Procedures Orders.

By this Monthly Fee Statement, Foley seeks (i) a monthly interim allowance of compensation in the amount of \$634,350.50 and actual and necessary expenses in the amount of \$18,636.43 for a total allowance of \$652,986.93 and (ii) payment of \$507,480.40 (80% of the allowed fees pursuant to the Compensation Procedures Orders) and reimbursement of \$18,636.43 (100% of the allowed expenses pursuant to the Compensation Procedures Orders) for a total payment of \$526,116.83 for the Fee Period.

#### SERVICES RENDERED AND EXPENSES INCURRED DURING THE FEE PERIOD

Attached as **Exhibit 1** is the name of each of Foley's professionals and paraprofessionals who performed services for the Debtor in connection with this Chapter 11 Case during the Fee Period covered

by this Monthly Fee Statement and the hourly rate and total fees for each professional during the Fee Period.

Attached as **Exhibit 2** is a summary of hours by category during the Fee Period.

Attached as <u>Exhibit 3</u> is a summary of expenses included in this Monthly Fee Statement incurred during the Fee Period.

Attached as <u>Exhibit 4</u> are the detailed time entries for Foley's professionals and paraprofessionals during the Fee Period.

#### **NOTICE AND OBJECTION PROCEDURES**

In accordance with the Compensation Procedures Orders, each Notice Party shall have until the tenth (10<sup>th</sup>) day (or the next business day if such day is not a business day) following service of this Monthly Fee Statement (the "Objection Deadline") to serve an objection to the Monthly Fee Statement on Foley and each of the other Notice Parties.

Upon the expiration of the Objection Deadline, the Applicant shall file a certificate of no objection with the Court, after which the Debtor is authorized and directed to pay the Applicant an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement.

If an objection is properly filed, the Debtor shall be authorized and directed to pay the Applicant 80% of the fees and 100% of the expenses not subject to an objection.

DATED: November 25, 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

TWENTY NINTH MONTHLY FEE STATEMENT OF FOLEY & LARDNER LLP

Case: 23-40523 Doc# 2464 Filed: 11/25<del>/2</del>5 Entered: 11/25/25 15:10:32 Page 4 of 60

#### **EXHIBIT 1**

# Compensation by Professional October 1, 2025 – October 31, 2025

Name of Professional Individual	Initials	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Emily G. Jones	EGJ	Associate, 2021	\$650	20.20	\$13,130.00
James G. Austin	JGAS	Associate, 2024	\$550	12.90	\$7,095.00
Leighton B. R. Allen	LBRA	Associate, 2019	\$700	3.80	\$2,660.00
Mary Rofaeil	MRL	Associate, 2021	\$675	26.90	\$18,157.50
Mason Roberts	MR	Associate, 2018	\$795	61.30	\$48,733.50
Michael H. Holland	MHH	Associate, 2022	\$650	0.70	\$455.00
Shane J. Moses	SJM	Of Counsel, 2005	\$875	99.20	\$86,800.00
Janelle C. Harrison	JCH	Paralegal, N/A	\$330	20.80	\$6,864.00
Kerry A Farrar	KAFA	Paralegal, N/A	\$450	19.30	\$8,685.00
Aaron K. Tantleff	AKT	Partner, 2004	\$1,325	5.90	\$7,817.50
Ann Marie Uetz	AMUE	Partner, 1993	\$1,050	112.60	\$118,230.00
Eileen R. Ridley	ERR	Partner, 1990	\$1,100	71.50	\$75,625.00
Emil P. Khatchatourian	EPK	Partner, 2009	\$875	15.70	\$13,737.50
Geoffrey S. Goodman	GSG	Partner, 1999	\$1,050	0.40	\$420.00
Jason J. Kohout	JJK	Partner, 2007	\$975	0.60	\$585.00
Jeffrey R. Blease	JRBL	Partner, 1988	\$1,375	1.40	\$1,925.00
Mark C. Moore	MCM	Partner, 2010	\$925	35.80	\$33,115.00
Thomas F. Carlucci	TFCA	Partner, 1987	\$1,375	1.30	\$1,787.50
Matthew D. Lee	MDL	Partner, 2006	\$875	64.80	\$56,700.00
Alan R. Ouellette	AROU	Senior Counsel, 2010	\$875	4.20	\$3,675.00
Elizabeth P. Mazzocco	EPM	Senior Counsel, 2014	\$840	115.30	\$96,852.00
Laura P. Mikeworth	LPM	Senior Counsel, 2017	\$815	1.40	\$1,141.00
Tamar N. Dolcourt	TND	Special Counsel, 2009	\$800	37.70	\$30,160.00
	ТОТ	AL		733.70	\$634,350.50

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 5 of 60

## **EXHIBIT 2**

## Compensation by Category October 1, 2025 – October 31, 2025

Category	Hours Billed this Fee Period	Total for Fee Statement
004 - Bankruptcy Litigation/Adversary Proceedings	2.10	\$1,859.50
006 - Case Administration (Docket Updates, WIP and calendar)	8.70	\$3,034.50
007 – Chapter 11 Plan / Plan Confirmation	7.70	\$6,737.50
008 – Communications with Client	26.00	\$25,732.50
011 – Cash Management	4.00	\$3,937.50
016 – General Case Strategy (includes calls with client and team calls)	22.50	\$20,615.00
017 – Hearings and Court Matters	49.50	\$48,406.00
018 - Non-Bankruptcy Litigation	29.40	\$26,468.00
019 – Non-Working Travel	5.50	\$3,025.00
020 – Retention/Billing/Fee Applications for Debtor Professionals	68.60	\$53,373.00
021 – Retention/ Fee Applications: Ordinary Course Professionals	3.30	\$3,065.00
022 – Retention/ Fee Applications: Other Professionals	14.30	\$11,932.50
025- U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Reports	1.70	\$1,215.00
026 – Unsecured Creditors Issues/Communications/Meetings	6.20	\$5,802.50
027 – Real Estate and Real Property Issues	0.60	\$525.00
031 – Insurance Issues (coverage, includes adversary proceeding)	262.30	\$213,503.50
032 – Rule 2004 Motions/Discovery/Subpoenas	0.70	\$315.00
034 – Other Motion Practice	75.80	\$63,525.00
035 – General Counsel Matters	11.70	\$12,203.50
038 – Mediation	133.10	\$129,075.00
TOTAL	733.70	\$634,350.50

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 6 of 60

## **EXHIBIT 3**

# Expense by Category October 1, 2025 – October 31, 2025

Costs/Expense	Amount Billed	
Electronic Legal Research Services	\$329.47	
LSS – eDiscovery Services	\$12,400.00	
Meals	\$588.64	
Other Expenses	\$200.00	
Service Fees	\$40.00	
Shipping Charges	\$87.42	
Transportation / Travel Expenses	\$4,990.90	
TOTAL	\$18,636.43	

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 7 of 60

## **EXHIBIT 4**

**Time Detail Entries** October 1, 2025 – October 31, 2025

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 8 of 60



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: November 25, 2025 Invoice No.: 51190427 Our Ref. No.: 100845-0402

Services through October 31, 2025

Amount due for professional services rendered regarding Chapter 11 Bankruptcy \$634,350.50

Total Expenses:

\$18,636.43

**Amount Due:** 

\$652,986.93

Our Ref. No.:100845-0402 Invoice No.: 51190427 Page 2 Foley & Lardner LLP November 25, 2025

#### **Professional Services Detail**

#### 004 Bankruptcy Litigation/Adversary Proceedings

001 201111	aproj Erog	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
10/02/25	SJM	Confer with G. Goodman regarding status of bankruptcy case and implications for remaining adversary proceeding.	0.40	\$350.00
10/27/25	GSG	Advise A. Uetz regarding status of appeal.	0.10	\$105.00
10/27/25	SJM	Respond to A. Uetz regarding status of appeal and reconsideration on dismissal of remaining adversary proceeding.	0.40	\$350.00
10/29/25	GSG	Correspondence with team regarding asset valuation issue.	0.10	\$105.00
10/30/25	GSG	Telephone conference with S. Moses regarding remaining adversary proceeding in light of dismissal issue.	0.20	\$210.00
10/30/25	SJM	Call with G. Goodman regarding case status and need to address remaining adversary proceeding.	0.30	\$262.50
10/31/25	MR	Email communications and review of documents in connection with privileged strategy matters regarding plan confirmation and related discovery.	0.60	\$477.00
		Task Total:	2.10	\$1,859.50
006 Case	Administra	tion (docket updates, WIP, and calendar)		
10/01/25	JCH	Update daily docket report.	0.50	\$165.00
10/02/25	JCH	Calendar status conference set for October 6, 2025 (.2); calendar extended deadline to assume or reject unexpired leases (.2); update daily docket report (.5).	0.90	\$297.00
10/06/25	JCH	Update daily docket report.	0.50	\$165.00
10/07/25	JCH	Update daily docket report.	0.20	\$66.00
10/08/25	JCH	Update daily docket report.	0.20	\$66.00
10/09/25	JCH	Update daily docket report.	0.20	\$66.00
10/10/25	JCH	Update daily docket report.	0.50	\$165.00

ROMAN (Our Ref. N Invoice No	lo.:100845	Page 3 Foley & Lardner LLP November 25, 2025		
10/13/25	JCH	Update daily docket report.	0.20	\$66.00
10/14/25	JCH	Update daily docket report.	0.50	\$165.00
10/15/25	JCH	Update daily docket report.	0.50	\$165.00
10/16/25	JCH	Update daily docket report.	0.20	\$66.00
10/17/25	JCH	Update daily docket report.	0.20	\$66.00
10/20/25	JCH	Update daily docket report.	0.50	\$165.00
10/21/25	JCH	Update daily docket report.	0.50	\$165.00
10/21/25	SJM	Review court announcements regarding limited operations and email to team regarding same.	0.20	\$175.00
10/22/25	JCH	Update daily docket report.	0.50	\$165.00
10/23/25	JCH	Update daily docket report.	0.20	\$66.00
10/24/25	JCH	Update daily docket report.	0.20	\$66.00
10/26/25	EPK	Review upcoming critical case dates and deadlines, including upcoming Rule 2015.3 reporting deadlines.	0.10	\$87.50
10/27/25	JCH	Update daily docket report.	0.50	\$165.00
10/28/25	JCH	Update daily docket report.	0.20	\$66.00
10/29/25	JCH	Update daily docket report.	0.50	\$165.00
10/30/25	JCH	Update daily docket report.	0.50	\$165.00
10/31/25	JCH	Update daily docket report.	0.20	\$66.00
		Task Total:	8.70	\$3,034.50
007 Chaj	oter 11 Pla	nn/ Plan Confirmation		
10/16/25	SJM	Work on identifying updates needed to plan in light of potential settlement.	1.80	\$1,575.00
10/21/25	SJM	Detailed review of plan and disclosure statement to identify potential edits needed for fourth amended plan in light of potential settlement.	2.30	\$2,012.50

Our Ref. N	CATHOLIC o.:100845-0 .: 51190427	Page 4 Foley & Lardner LLI November 25, 2025		
10/22/25	SJM	Work on preparing draft fourth amended plan in anticipation of potential settlements with insurers.	3.60	\$3,150.00
		Task Total:	7.70	\$6,737.50
008 Com	munication	s with Client		
10/02/25	AMUE	Finalize correspondence to client regarding privileged mediation issue (1.2) and communication with M. Kemner regarding same (.4).	1.60	\$1,680.00
10/02/25	MCM	Analyze correspondence with client parties regarding case status.	0.40	\$370.00
10/06/25	AMUE	Communications with client regarding mediation.	1.00	\$1,050.00
10/06/25	MDL	Telephone conference with M. Kemner regarding mediation preparations and strategy.	1.10	\$962.50
10/08/25	MDL	Revise summary of second day of mediation to be sent to client leadership.	0.40	\$350.00
10/09/25	AMUE	Analyze privileged matter related to mediation (2.5); debrief summary for leadership (1.5).	4.00	\$4,200.00
10/13/25	AMUE	Prepare for (1.5) and meet with client leadership regarding privileged mediation issue (.7).	2.20	\$2,310.00
10/13/25	AMUE	Revisions to draft communication from client regarding mediation issue.	1.20	\$1,260.00
10/13/25	MDL	Email correspondence with M. Kemner regarding confidential mediation issue.	0.20	\$175.00
10/13/25	MDL	Prepare for (.2) and participate in (.6) telephone conference with Bishop Barber, M. Kemner, and A. Bardos regarding confidential mediation issue and case resolution matters.	0.80	\$700.00
10/13/25	SJM	Meeting with client and Foley team regarding mediation status.	0.70	\$612.50
10/14/25	MCM	Email and telephone conference with client parties and Foley team regarding case status and recent events.	0.90	\$832.50
10/15/25	MDL	Telephone conference with M. Kemner regarding confidential mediation topic.	0.10	\$87.50

Our Ref. N	ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 5 Foley & Lardner LLP November 25, 2025	
10/16/25	MDL	Email correspondence with client leadership regarding confidential mediation topic.	0.10	\$87.50	
10/18/25	MDL	Email correspondence with M. Kemner and A. Bardos regarding reply brief in support of motion to dismiss.	0.10	\$87.50	
10/18/25	MDL	Telephone conference with M. Kemner regarding status of parties' response to mediators' proposal.	0.10	\$87.50	
10/20/25	MDL	Email exchange with M. Kemner and A. Bardos regarding draft motion to dismiss reply brief and A. Bardos declaration.	0.30	\$262.50	
10/22/25	MDL	Telephone conference with M. Kemner regarding confidential mediation topics.	0.70	\$612.50	
10/23/25	MDL	Email exchange with A. Bardos regarding potential transfer of de minimis real estate asset.	0.30	\$262.50	
10/25/25	AMUE	Multiple communications with client team regarding privileged mediation issue.	0.90	\$945.00	
10/25/25	MCM	Review correspondence with client parties regarding mediator/Committee response and related issues.	0.30	\$277.50	
10/27/25	AMUE	Meeting with M. Kemner and insurance counsel regarding privileged issue related to mediation (1.0); follow-up communications with M. Kemner and insurance counsel regarding communications to insurers (.8).	1.80	\$1,890.00	
10/27/25	SJM	Call with P. Bongiovanni regarding Century Urban status (.3); email to A. Uetz regarding same (.1).	0.40	\$350.00	
10/27/25	SJM	Call with A. Bardos regarding CU invoices.	0.20	\$175.00	
10/29/25	MDL	Email exchange with M. Kemner regarding results of hearing and public statements regarding same.	0.40	\$350.00	
10/30/25	AMUE	Summary communication with Foley team and client leadership regarding privileged settlement issue.	3.60	\$3,780.00	
10/30/25	MDL	Email exchange with M. Kemner and H. Osman regarding status of dismissal, hopes for continued settlement negotiations, and public statements regarding same.	0.60	\$525.00	

Our Ref. N	CATHOLIC (o.:100845-( o.: 51190427	•	Page 6 & Lardner LLP mber 25, 2025	
10/31/25	MCM	Analyze comprehensive client update regarding case status and response from same.	1.00	\$925.00
10/31/25	MDL	Revise communication to Bishop Barber regarding recommended strategy for completing bankruptcy case.	0.40	\$350.00
10/31/25	MDL	Email exchange with M. Kemner regarding mediation strategy with insurers.	0.20	\$175.00
		Task Total:	26.00	\$25,732.50
011 Cash	Managemo	ent		
10/08/25	SJM	Review CCCEB fourth quarter funding request (.3); email to A. Uetz, and M. Lee regarding same (.2).	0.50	\$437.50
10/10/25	AMUE	Strategize regarding settlement and cash management issues.	2.50	\$2,625.00
10/13/25	SJM	Prepare notice of CCCEB quarterly payment (.6); prepare notice of church bank account openings and closures (.4).	1.00	\$875.00
		Task Total:	4.00	\$3,937.50
016 Gene	eral Case St	rategy (includes team calls)		
10/03/25	MCM	Internal email correspondence regarding case strategy and related issues.	0.60	\$555.00
10/05/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.40	\$270.00
10/06/25	MRL	Finalize review of pending dioceses cases to provide an update on their status to the Foley team.	1.00	\$675.00
10/06/25	SJM	Email correspondence with case team regarding results of status conference.	0.50	\$437.50
10/07/25	MCM	Email correspondence with Foley team regarding case strategy and related issues.	0.40	\$370.00
10/09/25	AMUE	Analyze go-forward strategy.	2.00	\$2,100.00

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 7 Foley & Lardner LLF November 25, 2025	
10/09/25	MCM	Conference call with Foley team regarding case status post-mediation, briefing schedules, and related issues (.8); analysis of potential case outcomes and necessary steps (.5).	1.30	\$1,202.50
10/09/25	MDL	Strategize with Foley team regarding case conclusion scenarios.	0.80	\$700.00
10/09/25	SJM	Participate in team strategy call following mediation (partial).	0.50	\$437.50
10/10/25	MCM	Email correspondence with Foley team regarding action items and case strategy.	0.50	\$462.50
10/10/25	SJM	Email to case team regarding notes from team meeting.	0.30	\$262.50
10/11/25	MRL	Review pending dioceses cases to provide an update on their status to client.	0.30	\$202.50
10/13/25	MCM	Analysis of updated report of diocesan bankruptcy cases from M. Rofaeil.	0.40	\$370.00
10/13/25	MDL	Analyze real estate.	0.20	\$175.00
10/13/25	MRL	Finalize review of pending dioceses cases to provide an update on their status to the Foley team.	0.50	\$337.50
10/13/25	MRL	Email correspondence with S. Moses regarding analyzing other dioceses settlement announcements (.3); analyze other dioceses settlement announcements (.7).	1.00	\$675.00
10/14/25	MCM	Analysis of insurance issues associated with potential case outcomes.	0.40	\$370.00
10/14/25	MRL	Continue analyzing other dioceses settlement announcements.	1.10	\$742.50
10/16/25	MCM	Email correspondence with Foley team regarding case status and related issues.	0.40	\$370.00
10/20/25	MCM	Analysis of updated report of diocesan bankruptcy cases from M. Rofaeil.	0.40	\$370.00
10/22/25	MCM	Email correspondence with Foley team regarding hearing preparation on motion to dismiss and privilege issues in connection with certain documents.	0.50	\$462.50

Our Ref. N	ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 8 2 Lardner LLP mber 25, 2025
10/23/25	MCM	Conference call with Foley team regarding case status and related issues.	0.70	\$647.50
10/27/25	MCM	Analysis of updated report of diocesan bankruptcy cases from M. Rofaeil.	0.40	\$370.00
10/29/25	AMUE	Debrief with Foley team (2.0); analyze next steps (1.6); call with counsel for insurer (.5).	4.10	\$4,305.00
10/30/25	AMUE	Analyze post-hearing strategy regarding settlement.	2.40	\$2,520.00
10/30/25	MDL	Strategize regarding final attempt to secure consensual plan of reorganization.	1.40	\$1,225.00
		Task Total:	22.50	\$20,615.00
017 Hear	rings and C	ourt Matters		
10/06/25	ERR	Attend status conference before Judge Lafferty.	1.00	\$1,100.00
10/06/25	MCM	Attend status conference on dismissal/mediation issues in RCBO bankruptcy case (1.0); debrief with Foley team regarding same (.4).	1.40	\$1,295.00
10/06/25	MDL	Appear for Debtor at hearing on Chubb demand for Committee settlement offer.	1.00	\$875.00
10/06/25	MDL	Prepare for hearing on Chubb demand for Committee settlement offer.	0.90	\$787.50
10/06/25	SJM	Analyze order following status conference (.3); email to case team regarding same (.2).	0.50	\$437.50
10/06/25	SJM	Attend status conference on mediation privilege issue.	1.00	\$875.00
10/24/25	AMUE	Prepare for contested hearing regarding motion to dismiss.	1.20	\$1,260.00
10/24/25	MCM	Prepare for hearing on motion to dismiss RCBO bankruptcy case through review of prior transcripts and pleadings, particularly in connection with approval of the disclosure statement.	2.00	\$1,850.00
10/25/25	MCM	Prepare for hearing on motion to dismiss RCBO bankruptcy case.	0.70	\$647.50

Our Ref. N	ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 9 Lardner LLP nber 25, 2025
10/26/25	AMUE	Begin to outline argument for contested hearing on motion to dismiss (1.1) and communication with Foley team regarding same (.5).	1.60	\$1,680.00
10/27/25	AMUE	Prepare for oral argument on contested motion to dismiss.	3.80	\$3,990.00
10/27/25	MCM	Correspondence with Foley team regarding hearing and case issues prior to hearing on motion to dismiss.	0.40	\$370.00
10/28/25	AMUE	Draft case management status report in advance of hearing on motion to dismiss (3.3); communications with client and Foley team regarding revisions to same (1.2).	4.50	\$4,725.00
10/28/25	AMUE	Prepare for contested hearing on motion to dismiss.	3.60	\$3,780.00
10/28/25	MDL	Revise status conference statement.	0.60	\$525.00
10/28/25	SJM	Draft sections for Debtor status conference statement (1.8); revise draft status conference statement (.6); assist with finalizing same (.2).	2.60	\$2,275.00
10/29/25	AMUE	Prepare for (3.5) and appear at (2.4) hearing on motion to dismiss.	5.90	\$6,195.00
10/29/25	EPK	Listen to a portion of the hearing on RCBO's motion to dismiss the chapter 11 case.	1.20	\$1,050.00
10/29/25	EPM	Attend a portion of hearing on motion to dismiss the bankruptcy proceedings.	1.40	\$1,176.00
10/29/25	ERR	Attend bankruptcy court hearing regarding motion to dismiss (2.4); prepare for hearing (1.6); debrief with team after (.5).	4.50	\$4,950.00
10/29/25	MCM	Attend hearing on motion to dismiss RCBO bankruptcy case and Committee request for badfaith finding and bar to future bankruptcy filings (partial).	1.50	\$1,387.50
10/29/25	MDL	Appear for Debtor at hearing on motion to dismiss.	2.60	\$2,275.00
10/29/25	MDL	Prepare for hearing on motion to dismiss with Foley team.	2.10	\$1,837.50
10/29/25	MDL	Evaluate results of motion to dismiss hearing with	0.70	\$612.50

Foley team.

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 10 Foley & Lardner LLP November 25, 2025	
10/29/25	SJM	Attend hearing on motion to dismiss (2.3); meet with client and case team before and after hearing (.5).	2.80	\$2,450.00
		Task Total:	49.50	\$48,406.00
018 Non-	Bankrupt	ccy Litigation		
10/04/25	EPK	Review email from R. Simons regarding additional cases to be proposed for the JCCP 5108 CMC in October.	0.10	\$87.50
10/07/25	EPK	Email correspondence with R. Simons and A. Wyatt regarding Travelers' request for stipulation allowing Travelers to intervene in JCCP 5108 (.2); review separate email from R. Simons regarding three additional cases proposed for remand/trial (.1).	0.30	\$262.50
10/09/25	EPK	Email correspondence with R. Simons regarding CMC order requirements and request for further meet-and-confer call (.1); consult with E. Ridley and E. Mazzocco regarding same (.1).	0.20	\$175.00
10/13/25	ЕРК	Email correspondence with E. Ridley regarding proposed meet-and-confer call with R. Simons and carrier's counsel and preparation of list of test cases to be submitted to Judge Chatterjee this week (.2); email correspondence with R. Simons regarding further coordination on test cases (.2); email correspondence with E. Mazzocco regarding carriers' request for fact sheets and intervention issues (.3).	0.70	\$612.50
10/15/25	EPK	Confer with E. Mazzocco regarding RCBO's list of test cases and related explanatory notes to be submitted to the JCCP 5108 judge (.2); related email correspondence with E. Ridley (.2).	0.40	\$350.00
10/15/25	ERR	Review issues regarding selection of potential cases for lift of stay.	0.80	\$880.00

0.30

0.50

\$262.50

\$437.50

Strategize regarding lift stay case selection.

defend same.

Telephone conference with M. Plevin (Plevin & Turner) regarding lift stay cases and duty to

10/15/25

10/15/25

MDL

MDL

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 11 Foley & Lardner LLF November 25, 2025	
10/16/25	AROU	Review petition for writ of mandate filed in JCCP 5108.	0.90	\$787.50
10/16/25	EPK	Email correspondence with E. Ridley and E. Mazzocco regarding list of insurance-covered cases to be proposed in the JCCP 5108 (.5); separate call with E. Ridley and E. Mazzocco to review and discuss same (.5); meet and confer with R. Simons and E. Ridley in connection with JCCP 5108 test cases (partial) (.2); review R. Simons' list of agreed cases transmitted to J. Chorley of Clyde & Co. (.1); follow-on email correspondence with R. Simons and J. Chorley regarding objection to case list and proposal for other cases by certain carriers (.4); confer with E. Ridley regarding same (.1); email correspondence with D. Zamora of Weintraub Tobin regarding Plaintiffs' Writ Petition on Judge Chatterjee's Proposition 51 ruling in JCCP 5108 (.1); advise Foley team regarding same (.1).	2.00	\$1,750.00
10/16/25	EPM	Analyze state court cases proposed for stay relief for coverage and other criteria (5.5); call with E. Ridley and E. Khatchatourian regarding same (.5).	6.00	\$5,040.00
10/16/25	ERR	Review communications between R. Simons and J. Chorley regarding cases under stay.	0.50	\$550.00
10/16/25	ERR	Review potential cases to be selected by state court regarding lift of stay.	1.00	\$1,100.00
10/16/25	ERR	Telephone call with R. Simons regarding cases subject to lift stay.	0.40	\$440.00
10/17/25	EPK	Review initial draft of JCCP 5108 case management statement (.2); email correspondence with E. Ridley and M. Lee regarding comments and proposed revisions to same (.7); coordinate with M. Lee and E. Mazzocco regarding comments to Pacific insurers' list of proposed cases and proposed response to T. Schiavoni of O'Melveny (.3); call with D. Zamora to discuss status of case-selection process and CMC statement (.5); separate email to D. Zamora and R. Simons regarding RCBO's comments to the CMC statement (.1); review Pacific insurers' insert for the joint CMC statement (.1); review Santa Rosa's insert for the CMC statement (.1).	2.00	\$1,750.00

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 12 Foley & Lardner LLP November 25, 2025	
10/17/25	EPK	Review email correspondence with T. Schiavoni of O'Melveny and M. Lee regarding Pacific insurers' discovery requests and related JCCP 5108 case-selection issues (.2); review related guidance from E. Ridley (.1).	0.30	\$262.50
10/17/25	EPM	Review cases proposed for stay relief in state court.	1.70	\$1,428.00
10/17/25	MDL	Revise CMC statement on lift stay cases for JCCP 5108 case.	0.40	\$350.00
10/17/25	MDL	Strategize with E. Ridley regarding CMC statement on lift stay cases for JCCP 5108 case.	0.20	\$175.00
10/20/25	EPK	Review email from J. Chorley regarding case matrix receipt and Pacific insurers' case list (.1); review RCWC's revisions to the CMC statement (.1); coordinate with E. Ridley regarding response to Pacific insurers' CMC statement representations (.2); evaluate representations made in Pacific insurers' insert for the joint CMC statement (.2); revise CMC statement insert for RCBO (1.3); further coordination with E. Ridley and M. Lee regarding RCBO's CMC statement insert (.2); send RCBO's proposed insert for the CMC statement to R. Simons, D. Zamora, and J. Chorley (.2).	2.30	\$2,012.50
10/21/25	AROU	Review JCCP 5108 joint case management conference statement.	0.40	\$350.00
10/21/25	EPK	Confirm matters to be heard at this Friday's JCCP 5108 CMC (.1); review as-filed joint CMC statement, including review of RCWC's representations set forth in same (.2); email correspondence with E. Ridley regarding same (.1); follow up on status of writ filed by plaintiffs in respect of Judge Chatterjee's Proposition 51 ruling (.1).	0.50	\$437.50
10/22/25	ЕРК	Coordinate with E. Ridley to prepare for Friday's CMC in JCCP 5108 (.3); review update from liaison counsel and other diocesan counsel regarding Proposition 51 appeal (.1).	0.40	\$350.00

# ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402

Our Ref. N	CATHOLIC fo.:100845-0 o.: 51190427	Page 1 Foley & Lardner LL November 25, 202		
10/24/25	EPK	Attend monthly CMC in the JCCP 5108 with E. Ridley (1.0); post-hearing discussion with E. Ridley regarding outcome of the JCCP 5108 hearing (.2); short call with A. Uetz regarding same (.2); prepare client update email regarding results of CMC and related next steps (.8); confer with E. Ridley regarding comments to JCCP 5108 CMC client update (.3); review client email update sent by E. Ridley and related email correspondence with Bishop Barber, M. Kemner, and A. Bardos (.2).	2.70	\$2,362.50
10/24/25	ERR	Attend state court status conference regarding selection of cases for relief from stay (1.0) and prepare client report (.7).	1.70	\$1,870.00
10/27/25	AROU	Review preliminary opposition to writ petition in JCCP 5108.	0.40	\$350.00
10/27/25	AROU	Review JCCP 5108 joint case management conference statement.	0.40	\$350.00
10/28/25	AROU	Review status of case management orders in JCCP 5108.	0.40	\$350.00
10/28/25	EPK	Review institutional defendants' preliminary response to plaintiffs' writ challenging the Proposition 51 ruling (.1); confer with E. Ridley and A. Ouellette regarding status of post-CMC order (.2).	0.30	\$262.50
10/29/25	AROU	Respond to correspondence from liaison counsel for institutional defendants in JCCP 5108.	0.20	\$175.00
10/30/25	AROU	Review correspondence from counsel for Roman Catholic Welfare Corporation.	0.10	\$87.50
10/30/25	TFCA	Review letter from counsel regarding state cases (.1); discuss with A. Ouellette and S. Moses regarding same (.2).	0.30	\$412.50
10/31/25	AROU	Review JCCP 5108 cases with filed responsive pleadings on behalf of the Roman Catholic Bishop of Oakland.	0.30	\$262.50

#### ROMAN CATHOLIC BISHOP OF OAKLAND Page 14 Our Ref. No.:100845-0402 Foley & Lardner LLP Invoice No.: 51190427 November 25, 2025 10/31/25 **KAFA** Research number of cases in JCCP 5108 in which 0.30 \$135.00 we appeared as counsel of record in preparation for filing substitutions or motions to withdraw. Task Total: 29.40 \$26,468.00 019 Non-Working Travel 10/06/25 **ERR** Prepare for and travel to LA to attend mediation 3.50 \$1,925.00 (including review of communications from parties and pending issues regarding insurance position). 10/08/25 ERR Travel from LA to San Francisco regarding 2.00 \$1,100.00 attendance at mediation. Task Total: 5.50 \$3,025.00 020 Retention/Billing/Fee Applications for Debtor Professionals 10/01/25 **JCH** Work on Foley seventh interim fee application. 1.50 \$495.00 10/01/25 **TND** Review information needed for Foley interim fee 0.20 \$160.00 application. 10/02/25 **JCH** Finalize draft of Foley seventh interim fee 2.20 \$726.00 application. 10/02/25 **SJM** Respond to D. Goodwin (Covington) regarding 0.40 \$350.00 bankruptcy retention process. 10/02/25 **TND** Call with S. Moses regarding interim fee 0.20 \$160.00 application matters for Foley and other Debtor professionals. 10/06/25 SJM Email to D. Goodwin regarding Covington 1.10 \$962.50 employment (.4); call with T. Dolcourt regarding Covington employment and fee applications (.3); email correspondence with professionals regarding interim fee applications (.4). SJM 10/06/25 Begin work on Foley interim fee application. 1.20 \$1,050.00

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 22

	ur Ref. No.:100845-0402 voice No.: 51190427		Foley & Lardner LLP November 25, 2025	
10/06/25	TND	Calls and emails with S. Moses regarding Covington retention, interim fee application matters, and additional OCPs (.4); email correspondence with Covington regarding application (.1); email correspondence with Foley team regarding Covington matters and other issues (.6).	1.10	\$880.00
10/07/25	EPM	Draft insurance task code portion of interim fee application.	1.60	\$1,344.00
10/07/25	TND	Work on seventh interim fee application for Foley.	0.70	\$560.00
10/08/25	EPM	Continue drafting insurance task code portion of interim fee application.	2.60	\$2,184.00
10/08/25	SJM	Email correspondence regarding Covington employment as special insurance counsel.	1.10	\$962.50
10/08/25	TND	Review issues for Foley seventh interim fee application (.2); emails with Covington team regarding retention issues (.2).	0.40	\$320.00
10/09/25	SJM	Work on background section for Foley fee application.	2.10	\$1,837.50
10/09/25	SJM	Draft application to approve retention of Covington as special insurance counsel.	2.70	\$2,362.50
10/09/25	TND	Work on draft seventh interim fee application for Foley.	3.30	\$2,640.00
10/10/25	TND	Confer with S. Moses on logistics of interim fee application completion and filing for Debtor professionals.	0.40	\$320.00
10/11/25	TND	Further work on Foley seventh interim fee application (1.6); email to I. Velikova on NERA interim fee application (.1).	1.70	\$1,360.00
10/12/25	TND	Further preparation of Foley seventh interim fee application.	1.60	\$1,280.00
10/13/25	JCH	Review amount of fees paid and update in Foley's seventh interim fee application.	0.50	\$165.00
10/13/25	SJM	Confer with T. Dolcourt regarding finalizing Foley fee application (.3); work on drafting Foley final fee application (5.5).	5.80	\$5,075.00

Page 15

Our Ref. N	CATHOL No.:100845 o.: 5119042		•	Page 16 Lardner LLP mber 25, 2025
10/13/25	SJM	Email to A. Zimmerman (Hilco) regarding interim fee application.	0.30	\$262.50
10/13/25	TND	Further updates to seventh interim fee application (1.4); email correspondence with I. Velikova and N. Corbett regarding fee applications (.2).	1.60	\$1,280.00
10/14/25	JCH	Revise R. Newsome's interim fee application to conform with local filing guidelines (.5); prepare and file omnibus certificate of no objection to August 2025 fee statements of Debtor's professionals (.8).	1.30	\$429.00
10/14/25	MDL	Revise Foley & Lardner interim fee application.	0.70	\$612.50
10/14/25	MDL	Evaluate Hilco payment terms.	0.20	\$175.00
10/14/25	SJM	Analyze approach to Hilco fee application in light of fixed-fee appraisals (.6); call with M. Lee regarding same (.2).	0.80	\$700.00
10/14/25	SJM	Coordinate with other Debtor professionals regarding interim fee applications (1.3); assist with preparation of Foley interim fee application (1.1).	2.40	\$2,100.00
10/14/25	TND	Further work on Foley's seventh interim fee application (2.4); review NERA and A&M interim applications (.7); call with I. Velikova regarding NERA application (.4); update NERA application (.7).	4.20	\$3,360.00
10/15/25	EPM	Revise seventh interim fee application.	1.20	\$1,008.00
10/15/25	JCH	Revise Foley's seventh interim fee application related to amounts (.5); finalize interim fee applications and declarations for filing for Foley, A&M, NERA, Verita, T. Gallagher, R. Newsome and Hilco Real Estate (.8); file interim fee applications and declarations and omnibus notice of hearing regarding same (.8).	2.10	\$693.00
10/15/25	MCM	Review fee applications and statements from estate and other professionals.	0.70	\$647.50
10/15/25	SJM	Revise Hilco interim fee application (.7); email correspondence with Hilco regarding finalizing same (.4); email to M. Lee regarding same (.1).	1.20	\$1,050.00

Review Verita interim fee application (.6); email

to Verita regarding same (.2).

10/15/25

SJM

0.80

\$700.00

ROMAN ( Our Ref. N Invoice No	o.:100845	Page 17 Foley & Lardner LLP November 25, 2025		
10/15/25	SJM	Email to J. Breall regarding holdback language for interim fee application.	0.20	\$175.00
10/15/25	SJM	Final review of Foley's interim fee application (1.3); assist with finalizing same (.6); prepare omnibus notice of hearing on interim fee applications (1.1); direct Verita regarding service of fee applications (.4).	3.40	\$2,975.00
10/15/25	TND	Finalize Foley seventh interim fee application (4.2); finalize NERA application and declaration (.9); review A&M application (.3); email correspondence with N. Corbett regarding A&M application (.2).	5.60	\$4,480.00
10/16/25	SJM	Further work on application to retain Covington as special insurance counsel (.6); email to A. O'Brient regarding same (.3); draft declarations of D. Goodwin and A. Bardos in support of application (1.4).	2.30	\$2,012.50
10/16/25	TND	Email to N. Corbett and I. Velikova regarding as- filed fee applications (.2); confer with S. Moses on Covington retention (.1).	0.30	\$240.00
10/17/25	SJM	Revise application to employ Covington as special insurance counsel in light of comments from A. O'Brient.	0.60	\$525.00
10/20/25	SJM	Finalize application to employ Covington as special insurance counsel based on comments from D. Goodwin.	0.60	\$525.00
10/20/25	TND	Prepare information for September monthly fee application to ensure compliance with U.S. Trustee guidelines.	0.80	\$640.00
10/21/25	TND	Further preparation of information for September Foley fee statement to ensure compliance with U.S. Trustee guidelines.	1.50	\$1,200.00
10/22/25	SJM	Respond to emails from U.S. Trustee and fee examiner regarding LEDES files for Foley fee application.	0.30	\$262.50
10/23/25	TND	Further work on September fee statement to ensure compliance with U.S. Trustee guidelines.	0.60	\$480.00
10/27/25	SJM	Finalize proposed order for employment of Covington.	0.30	\$262.50

#### ROMAN CATHOLIC BISHOP OF OAKLAND Page 18 Our Ref. No.:100845-0402 Foley & Lardner LLP Invoice No.: 51190427 November 25, 2025 10/27/25 **TND** Further preparation of September Foley fee 0.30 \$240.00 application (.2); email with A. Uetz regarding same (.1). 10/28/25 **TND** Further preparation of September fee statement 0.30 \$240.00 (.2); discussion with S. Moses regarding same (.1).10/30/25 **JCH** Prepare (.6) and file (.2) Foley's monthly fee 0.80 \$264.00 statement for September 2025. 10/30/25 **TND** Finalize September Foley fee application. 0.80 \$640.00 Task Total: 68.60 \$53,373.00 021 Retention/Fee Applications: Ordinary Course Professionals 10/10/25 Call with G. Miller regarding OCP employment SJM 1.40 \$1,225.00 (.4); prepare OCP questionnaire for Coblentz (.4); prepare OCP questionnaire for LDP (.3); emails to G. Miller and M. Loeb regarding same (.3). 10/13/25 SJM Respond to G. Ficks regarding Coblentz OCP 0.30 \$262.50 retention. 10/23/25 SJM Email correspondence regarding ordinary course 0.30 \$262.50 employment of professionals in connection with real estate sales. 10/24/25 **TND** Review M. Kemner monthly invoice. 0.20 \$160.00 10/26/25 **AMUE** Review communications with client team 0.60 \$630.00 regarding OCP issue (.3) and direct response to same (.3). 10/27/25 **AMUE** Follow up regarding client issue regarding 0.50 \$525.00 retention of certain OCPs related to real estate.

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 26

Task Total:

3.30

\$3,065.00

Page 19 Foley & Lardner LLP Our Ref. No.:100845-0402 November 25, 2025 Invoice No.: 51190427

022 I	Retention/Fee	Applications: Other Professionals		
10/03/	25 SJM	Email to client regarding professional monthly fee statements for August (.6); analyze approach to payment of mediators and fee examiner under interim fee orders (1.2); email to client regarding payment of remaining unpaid amounts less holdback (.7).	2.50	\$2,187.50
10/08/	25 SJM	Review pro hac vice applications filed in bankruptcy court adversary proceedings (.6); email to case team regarding same (.3).	0.90	\$787.50
10/08/	25 SJM	Review status of payment to mediators (.4); call with A. Bardos regarding payment to mediators (.2); email to A. Bardos and J. Pluth regarding same (.3).	0.90	\$787.50
10/08/	25 TND	Analyze matters related to new pro hac vice applications for Committee counsel in remaining adversary proceeding (1.3); prepare draft response to same (.4).	1.70	\$1,360.00
10/11/	25 TND	Revise Judge Newsome's fourth interim fee application.	0.40	\$320.00
10/13/	25 TND	Update Newsome interim fee application (.2); email with R. Newsome regarding same (.1); email to A. Fernandez regarding Gallagher fee application (.1).	0.40	\$320.00
10/15/	25 SJM	Email to client regarding Committee member reimbursement application.	5.00	\$4,375.00
10/15/	25 TND	Finalize R. Newsome fee application (.2); prepare T. Gallagher fee application (.9); communications with A. Fernandez regarding T. Gallagher fee application (.3).	1.40	\$1,120.00
10/16/	25 SJM	Email to client regarding filed CNOs for August monthly fee statements.	0.40	\$350.00
10/16/	25 TND	Email as-filed interim fee applications to A. Fernandez and R. Newsome.	0.20	\$160.00
10/30/	25 JCH	Prepare chart of interim payments due to all case professionals and email same to S. Moses.	0.50	\$165.00
		Task Total:	14.30	\$11,932.50

Page 20 Foley & Lardner LLP November 25, 2025 Our Ref. No.:100845-0402 Invoice No.: 51190427

025 U.	S. Trustee Iss	ues/ Meetings/ Communications/ Monthly Operating		
10/16/2:		Email correspondence with D. Flanagan of VeraCruz regarding initial compilation of the September 2025 MOR package.	0.10	\$87.50
10/17/2:	5 EPK	Email correspondence with D. Flanagan of VeraCruz and A. Bardos of RCBO regarding draft September 2025 MOR package and approval for filing same on October 21, 2025.	0.20	\$175.00
10/19/2:	5 EPK	Review preliminary draft of the September 2025 MOR package (.3); provide comments on same to D. Flanagan of VeraCruz and A. Bardos of RCBO (.1).	0.40	\$350.00
10/21/2:	5 EPK	Supervise filing and service of the September 2025 MOR (.1); email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding as-filed September 2025 MOR (.1).	0.20	\$175.00
10/21/2:	5 JCH	File September 2025 monthly operating report and circulate filed copy of same to client group.	0.50	\$165.00
10/22/2:	5 EPK	Review U.S. Trustee quarterly fee calculation and related email correspondence from D. Flanagan of VeraCruz (.1); email correspondence with A. Bardos of RCBO regarding approval of same (.1).	0.20	\$175.00
10/27/2:	5 EPK	Email correspondence with D. Flanagan of VeraCruz regarding September 2025 MOR supplement for the BRG team.	0.10	\$87.50
		Task Total:	1.70	\$1,215.00
026 Uı	nsecured Cred	litor Issues/Communications/Meetings		
10/01/2	5 MCM	Review email correspondence concerning Chubb invocation of duty to cooperate and potential Committee response to same.	0.30	\$277.50
10/01/23	5 MDL	Email exchange with J. Prol (Lowenstein) and T. Burns (Burns Bair) regarding insurers' demand for Committee payment demand.	0.50	\$437.50
10/02/2	5 MDL	Telephone conference with T. Gallagher regarding insurer demand for Committee payment demand.	0.10	\$87.50

#### ROMAN CATHOLIC BISHOP OF OAKLAND Page 21 Our Ref. No.:100845-0402 Foley & Lardner LLP Invoice No.: 51190427 November 25, 2025 10/02/25 **MDL** Telephone conference with M. Kaplan 0.20 \$175.00 (Lowenstein) regarding most recent document production and issue of Committee's payment demand. \$787.50 10/02/25 **MDL** Strategize regarding insurer demand for 0.90 Committee payment demand. Review email correspondence regarding prior turn 10/08/25 **MCM** 0.70 \$647.50 of child-protection protocols from 2024 by Committee (.2); begin analysis of proposed protocols (.5). 10/09/25 **MCM** Continue analysis of proposed child-protection 0.90 \$832.50 protocols from 2024. Call with counsel for Franciscan Friars regarding 10/14/25 SJM 0.50 \$437.50 case status. 10/24/25 **AMUE** Revisions to communication to Committee 1.10 \$1,155.00 counsel regarding Livermore property. 10/27/25 Communication with J. Prol regarding settlement **AMUE** 0.40 \$420.00 issue. 10/29/25 Analyze October 2024 Committee turn of child-0.40 \$370.00 **MCM** protection protocols in context of potential settlement. 10/31/25 **MDL** Email exchange with Judge Hogan and his 0.20 \$175.00 counsel regarding possible consensual plan terms. Task Total: 6.20 \$5,802.50 027 Real Estate and Real Property Issues 10/31/25 SJM 0.60 \$525.00

Email to B. Sparkman detailing status of case and implications for Century Urban work.

> Task Total: 0.60 \$525.00

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 29

Our Ref. No.:100845-0402 Foley & Lardner LLP Invoice No.: 51190427 November 25, 2025 031 Insurance Issues (coverage, includes adversary proceeding) 10/01/25 **EPM** 6.80 \$5,712.00 Draft interrogatories and second set of requests for production to US Fire (2.8); draft dispute letter documenting discovery disputes with insurers (4.0). 10/01/25 **ERR** Edit discovery to US Fire. 0.90 \$990.00 10/01/25 **JCH** Email correspondence with Judge Corley's 0.50 \$165.00 courtroom deputy regarding order on stipulation to extend date to submit discovery dispute letters. 10/01/25 MR Draft discovery-related letter communications to 3.40 \$2,703.00 counsel for insurer defendants in insurance coverage action (2.9); analyze additional documents for potential production in insurance coverage action (.5). 10/02/25 **AMUE** Draft communication to Committee, insurers and 2.40 \$2,520.00 mediators regarding Chubb request for copy of settlement demand (.8); communications with Foley team regarding same (.7); follow-up emails with T. Burns and T. Schiavoni, and mediators (.9).**EPM** 10/02/25 Revise letter documenting results of meet and 4.00 \$3,360.00 confer discussions with Pacific entities (1.0); continue drafting dispute letter documenting status of discovery disputes with insurers (3.0). 10/02/25 **JCH** Follow-up email and telephone call to Judge 0.50 \$165.00 Corley's courtroom deputy regarding order on stipulation to extend date to submit discovery dispute letters. 10/02/25 MR 1.10 \$874.50 Analyze materials in connection with drafting redaction log specific to insurance coverage action (.7); review further correspondence received from insurer defendants (.2); privileged internal email communications regarding discovery-related matters in insurance coverage action (.2). 10/03/25 **EPM** Email correspondence regarding mediation 1.40 \$1,176.00 discussions with insurers (.3); revise correspondence to the Pacific entities (.5); analysis of claims attributable to specific insurers

Page 22

(.6).

Our Ref. N	Our Ref. No.:100845-0402 nvoice No.: 51190427		Foley & Lardner LLP November 25, 2025	
10/03/25	ERR	Review communications from Chubb counsel and strategize regarding response.	1.40	\$1,540.00
10/03/25	KAFA	Communications with E. Mazzocco regarding productions to Chubb.	0.20	\$90.00
10/06/25	EGJ	Confer with E. Mazzocco regarding preparation for joint discovery dispute letter.	0.20	\$130.00
10/06/25	EPM	Analysis of outstanding tasks in insurance case (.7); revise correspondence to insurers (2.8).	3.50	\$2,940.00
10/06/25	ERR	Review order from case status conference.	0.50	\$550.00
10/06/25	MR	Review correspondence received from insurer defendants in insurance coverage action and analyze next steps in relation to same.	0.60	\$477.00
10/07/25	EGJ	Confer with E. Mazzocco and M. Roberts regarding case priorities, strategy, and discovery tasks prior to November deadline (.8); begin to analyze dispute letters (.3).	1.10	\$715.00
10/07/25	EPM	Strategize regarding correspondence received from insurers (.9); prepare for conference call regarding outstanding task items in insurance case (.2); conference call with M. Roberts and E. Jones regarding same (.8); revise correspondence to insurers regarding discovery issues (2.2).	4.10	\$3,444.00
10/07/25	MR	Perform privileged analysis of discovery-related communications with counsel for insurer defendants in insurance coverage action (.4); attend strategy call with E. Mazzocco and E. Jones regarding discovery in insurance coverage action (.8); revise draft letter to counsel for Pacific entity insurers (.7); review additional documents for potential production in insurance coverage action (.6).	2.50	\$1,987.50
10/08/25	EGJ	Analyze all Chubb inquiries received following meet and confer (.7) and begin to organize and respond to requests in same (.7).	1.40	\$910.00
10/08/25	ЕРК	Review prior analysis of Ninth Circuit case law regarding jurisdictional issues (.3); email correspondence with A. Uetz regarding jurisdictional issues relating to the insurance adversary proceeding (.2).	0.50	\$437.50

Page 23

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 24 Foley & Lardner LLP November 25, 2025	
10/08/25	EPM	Finalize correspondence to insurers regarding discovery issues (2.0); comment on draft cost sharing agreement with insurers (1.5).	3.50	\$2,940.00
10/08/25	KAFA	Prepare information requested by E. Jones regarding productions to Chubb.	1.60	\$720.00
10/08/25	MR	Draft further revisions to discovery-related correspondence to insurer defendants in insurance coverage action (.9); privileged internal email communications regarding discovery-related issues (.4).	1.30	\$1,033.50
10/08/25	SJM	Research regarding jurisdictional issues related to possible dismissal (1.3); email to case team regarding same (.3).	1.60	\$1,400.00
10/09/25	EGJ	Analyze information regarding fact sheets to draft responses to Chubb letters regarding same.	0.40	\$260.00
10/09/25	EPM	Internal discussions regarding discovery correspondence with insurers.	0.40	\$336.00
10/09/25	ERR	Review status of discovery requests from insurers.	0.50	\$550.00
10/09/25	KAFA	Call with M. Roberts and D. DiFrancesco regarding redaction log for documents that were produced to the insurers with redactions (.5); set up saved searches of all productions with redaction filtering (1.2); prepare list of documents produced to insurers (.4); prepare information for October Chubb letter tracking chart (.7).	2.80	\$1,260.00
10/09/25	MR	Attend strategy call with D. DiFrancesco and K. Farrar regarding completion of redaction log in insurance coverage action (.5); assess documents in connection with completion of redaction log (.7).	1.20	\$954.00
10/10/25	EGJ	Confer with E. Mazzocco and M. Roberts regarding preparation for joint discovery dispute letter (.8); follow-up tasks related to same, including draft standard response (.3).	1.10	\$715.00
10/10/25	EPM	Conference call with M. Roberts and E. Jones regarding case status and outstanding tasks (.8); draft communication to client (1.7); review privilege log (.2); correspondence with insurers regarding correspondence received (.4); finalize discovery correspondence to Pacific entities (.8).	3.90	\$3,276.00

Case: 23-40523 Doc# 2464 Filed: 11/25/25 of 60 Entered: 11/25/25 15:10:32 Page 32

ROM	IAN CA	ATHOLIC	BISHOP	OF O	AKLAND

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 25 Foley & Lardner LLP November 25, 2025	
10/10/25	ERR	Review pending discovery issues and response to Pacific inquiries on discovery.	1.50	\$1,650.00
10/10/25	KAFA	Assist E. Mazzocco and E. Jones with production information for October Chubb response letter.	1.30	\$585.00
10/10/25	MR	Attend strategy call with E. Mazzocco and E. Jones regarding privileged discovery-related matters in insurance coverage action (partial) (.5); internal email communications regarding privileged discovery-related matters (.4); review Excel file version of privilege log requested by Pacific entity insurers (.2); coordinate supplemental production of documents to certain insurer defendants (.3); assess documents in connection with completing redaction log (.6); analyze documents for potential further production (.9).	2.90	\$2,305.50
10/11/25	ERR	Review additional communications regarding discovery production.	0.50	\$550.00
10/13/25	AMUE	Review multiple correspondence received from Chubb (.8) and provide advice to Foley team regarding response to same (.9).	1.70	\$1,785.00
10/13/25	EGJ	Confer with K. Farrar regarding fact sheets and employment verifications (.3); analyze discovery records to identify facts salient to individual responses on 20+ proofs of claim raised by Chubb (1.7); draft individual responses on each proof of claim for E. Mazzocco review (1.3).	3.30	\$2,145.00
10/13/25	EPM	Draft correspondence to the Pacific entities in response to discovery inquiries (1.3); conduct legal and factual research to support positions taken in discovery correspondence to insurers (1.2); prepare meet and confer summary regarding discovery disputes to insurers (2.3); draft summary of legal research topics to address (.4); correspondence with J. Breall regarding discovery subjects (.5).	5.70	\$4,788.00
10/13/25	ERR	Edit response to various insurer letters regarding discovery and settlement/drop-down positions.	2.00	\$2,200.00
10/13/25	ERR	Review discovery response regarding Westport.	0.50	\$550.00

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 26 Foley & Lardner LLP November 25, 2025	
10/13/25	ERR	Review Travelers position regarding selection of cases and communicate with plaintiffs' counsel regarding same.	0.50	\$550.00
10/13/25	KAFA	Assist E. Mazzocco and E. Jones with information for October Chubb response letter/discovery disputes.	1.80	\$810.00
10/13/25	MDL	Strategize with Foley team regarding responses to Pacific discovery demand letters.	0.60	\$525.00
10/13/25	MR	Coordinate supplemental production of documents to certain insurer defendants in insurance coverage action (.2); internal email correspondence regarding privileged discovery-related matters in insurance coverage action (.4); review documents in connection with creation of redaction log in insurance coverage action (.5).	1.10	\$874.50
10/14/25	AMUE	Review multiple emails from counsel for Chubb with multiple asks directed to different lawyers at Foley for information (1.3); analyze response (.8) and communications with Foley team to provide advice regarding response to the letters (.8).	2.90	\$3,045.00
10/14/25	EGJ	Confer with E. Mazzocco and M. Roberts regarding preparation for joint discovery dispute letter (.5); confer with E. Mazzocco regarding specific POC inquiries and proposed responses (.4); draft and send inquiry to Foley team regarding employment verification need (.2); draft one of two response letters to Chubb regarding POCs (.8); draft inquiry regarding specific alleged abuser where documents are needed (.3).	2.20	\$1,430.00
10/14/25	EPK	Email correspondence with A. Uetz and E. Jones regarding Chubb's discovery requests and data needed to respond to same.	0.20	\$175.00

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 27 Foley & Lardner LLP November 25, 2025	
10/14/25	EPM	Draft email to client regarding privileged discovery matter (.3); Foley-internal correspondence regarding communications to insurers regarding discovery disputes (.8); review history of insurer document productions (.9); prepare responsive correspondence to the Pacific entities regarding discovery disputes (1.3); revise insurance case task list (.5); review pleadings from bankruptcy case related to insurance discovery disputes (.7); provide comments on E. Jones' analysis of insurer discovery disputes (.3); call with M. Roberts and E. Jones regarding insurance case tasks (2x calls, one .5 and one .4) (.9); review documents subject to production (.4).	6.10	\$5,124.00
10/14/25	ERR	Review communication from Chubb regarding case-related documents.	0.50	\$550.00
10/14/25	ERR	Review issues regarding production, cyber issues and response to insurance counsel regarding case status.	1.00	\$1,100.00
10/14/25	KAFA	Continue to assist E. Mazzocco, M. Roberts and E. Jones with information for Chubb and AHA response letters related to discovery disputes.	3.00	\$1,350.00
10/14/25	MDL	Revise response to Pacific Indemnity's demand for mini fact sheets and long fact sheets.	0.20	\$175.00
10/14/25	MR	Internal email communications regarding privileged strategy matters for insurance coverage action (.5); attend teleconference with E.  Mazzocco and E. Jones regarding discovery in insurance coverage action (.5); analyze documents in connection with drafting redaction log for insurance coverage action (1.0); draft objections and responses to requests for production from CIGA (.8).	2.80	\$2,226.00
10/15/25	EGJ	Confer with E. Mazzocco, M. Roberts, and E. Ridley regarding discovery issues (.7); prepare for (.3) and follow-up from (.4) same.	1.40	\$910.00

## **ROMAN CATHOLIC BISHOP OF OAKLAND**Our Ref. No :100845-0402

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 28 Foley & Lardner LLP November 25, 2025	
10/15/25	EPM	Discuss outstanding insurance case tasks with M. Roberts (.3); investigate and correspond regarding discovery inquiries from American Home Insurance (1.3); review internal investigation tasks associated with discovery disputes (.5); calls with E. Ridley, M. Roberts, and E. Jones regarding same (.7); conduct coverage analysis for potential state court cases proposed for stay relief (4.6); revise correspondence to Pacific entities (.2).	7.60	\$6,384.00
10/15/25	ERR	Respond to Chubb letter regarding Pacific entities' dropping down and settlement positions.	0.50	\$550.00
10/15/25	ERR	Review discovery issues with insurers including Westport and Pacific.	1.00	\$1,100.00
10/15/25	KAFA	Continue to assist E. Mazzocco and M. Roberts with information for Chubb and AHA related to discovery disputes.	1.50	\$675.00
10/15/25	MR	Communicate with counsel for insurers regarding requests for meet and confer discussions (.4); coordinate creation of redaction log for insurance coverage action and review documents in relation to same (1.5); draft responses to requests for production issued by CIGA (2.1); attend strategy teleconference with E. Ridley, E. Mazzocco and E. Jones regarding privileged matters in insurance coverage action (.7); draft response letter to counsel for Pacific entity insurers regarding various coverage-related issues (.9).	5.60	\$4,452.00
10/16/25	EGJ	Confer with E. Mazzocco regarding preparation for joint discovery dispute letter.	0.10	\$65.00
10/16/25	ERR	Edit discovery letters to insurers regarding case status.	1.00	\$1,100.00
10/16/25	KAFA	Assist E. Mazzocco and M. Roberts with redacted set of documents produced to the insurers in preparation for redaction log.	0.30	\$135.00
10/16/25	MDL	Draft email to O'Melveny team regarding Pacific Indemnity's incessant and improper discovery and information demands.	0.40	\$350.00
10/16/25	MDL	Revise letter to Pacific Indemnity's counsel regarding voluntary payment argument.	0.20	\$175.00

# **ROMAN CATHOLIC BISHOP OF OAKLAND** Our Ref. No.:100845-0402

Our Ref. N	ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 29 Lardner LLP mber 25, 2025
10/16/25	MR	Revise draft of response letter to counsel for Pacific entity insurers regarding various coverage-related issues (.8); further email communications with insurers' counsel regarding requests to meet and confer (.2); review documents in connection with creating redaction log (.8); review further letter and email received from insurer defendants regarding discovery in insurance coverage action (.2); continue drafting objections and responses to requests for production served by CIGA (1.1).	3.10	\$2,464.50
10/17/25	EGJ	Confer with E. Mazzocco regarding privileged matter (.2) and follow-up research regarding records of same (.4).	0.60	\$390.00
10/17/25	EPM	Respond to letter and email from Pacific entities (1.5); investigate and draft response to targeted discovery inquiry from Pacific entities (1.3); email correspondence with client (.3).	3.10	\$2,604.00
10/17/25	ERR	Edit submittal on case management statement for state cases regarding insurer participation.	0.80	\$880.00
10/17/25	ERR	Review pending discovery issues with insurer including meet and confer letters.	1.00	\$1,100.00
10/17/25	JGAS	Conference with M. Roberts and M. Holland regarding creation of redaction log.	0.70	\$385.00
10/17/25	MDL	Revise email to O'Melveny Myers team regarding Pacific Indemnity's repeated and improper demands for discovery and information.	0.30	\$262.50
10/17/25	MDL	Evaluate Pacific Indemnity information and other demands and potential responses to same.	0.60	\$525.00
10/17/25	МНН	Conference with M. Roberts and J. Austin regarding preparing redaction log.	0.70	\$455.00
10/17/25	MR	Attend strategy call with J. Austin and M. Holland regarding privileged discovery-related matters in insurance coverage action (.7); further email correspondence with counsel for insurers regarding discovery issues (.3); continue reviewing documents in relation to drafting redaction log (.8).	1.80	\$1,431.00
10/19/25	MR	QC review of draft redaction log (.4); continue drafting objections and responses to requests for production from CIGA (.9).	1.30	\$1,033.50

Our Ref. N	ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427		Page 30 Foley & Lardner LLI November 25, 2025	
10/20/25	EGJ	Analyze client update regarding missing information relative to Chubb responses.	0.10	\$65.00
10/20/25	EPM	Quality control review of documents slated for production (1.9); review status of discovery disputes with insurers and related legal research (.7).	2.60	\$2,184.00
10/20/25	ERR	Edit case management statement for state case.	1.20	\$1,320.00
10/20/25	ERR	Review status of insurance disputes.	0.80	\$880.00
10/20/25	JGAS	Code electronic documents for redaction log in connection with insurance matters within chapter 11 adversary proceeding.	0.10	\$55.00
10/20/25	MR	Communicate with M. Holland and J. Austin regarding draft redaction log (.2); QC review of documents in furtherance of redaction log drafting (.7); further email communications with counsel for insurers regarding meet and confer calls in insurance coverage action (.3); prepare for meet and confer calls with various insurer defendants in insurance coverage action (.9).	2.10	\$1,669.50
10/21/25	AMUE	Review privileged issue regarding insurance discovery (.8) and emails from insurers related to same (.4).	1.20	\$1,260.00
10/21/25	EGJ	Confer with E. Mazzocco regarding legal research for joint discovery dispute letter (.4); analyze relevant documents in advance of same (.2).	0.60	\$390.00
10/21/25	EPM	Update insurance case task list (.9); quality control review of documents slated for production (2.2); review legal research in support of joint discovery dispute letter (1.2); call with E. Jones regarding same (.3); revise draft response letter to insurer inquiries (.9); privileged internal email correspondence regarding accused priest (.4); review insurer correspondence regarding discovery disputes (.6).	6.50	\$5,460.00
10/21/25	ERR	Review insurer request for additional production from diocese.	1.00	\$1,100.00
10/21/25	JGAS	Code electronic documents for redaction log in connection with insurance matters within chapter 11 adversary proceeding.	1.40	\$770.00

Our Ref. N	ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427		Page 31 Foley & Lardner LLP November 25, 2025	
10/21/25	MR	Continue drafting objections and responses to requests for production issued by CIGA.	1.40	\$1,113.00
10/22/25	AROU	Review document requests from insurers.	1.10	\$962.50
10/22/25	EGJ	Confer with E. Mazzocco and M. Roberts regarding preparation for joint discovery dispute letters (.6); perform legal research and analysis regarding discovery dispute letters (.8); analyze new letter from Pacific entities to inform response strategy (.8); confer with T. Carlucci, J. Blease, E. Mazzocco, E. Ridley and A. Ouelette regarding sensitive issues implicated in Pacific entity responses (1.1); revise response to Pacific 10-1 letter (.4); confer with K. Farrar regarding response to 10-21 letter (.1).	3.80	\$2,470.00
10/22/25	EPM	Call with J. Blease, T. Carlucci, A. Ouellette, E. Ridley, and E. Jones regarding insurer discovery inquiry (1.1); preparation for same (.9); call with M. Roberts and E. Jones regarding insurance case tasks (.6); review draft response to insurer discovery request (.4); review documents slated for production (1.6); review bankruptcy and insurance privilege logs (.6).	5.20	\$4,368.00
10/22/25	ERR	Review issues regarding past production of priest files and related materials.	1.00	\$1,100.00
10/22/25	KAFA	Prepare responses to Chubb's questions regarding specific alleged abusers and what documents were collected and produced.	1.30	\$585.00
10/22/25	MR	Review documents in connection with QC of redaction log (.8); attend strategy call with E. Mazzocco and E. Jones regarding privileged matters relating to discovery in insurance coverage action (.6); review further letter received from insurer defendants regarding document productions (.4); privileged internal email communications regarding discovery in insurance coverage action (.4).	2.20	\$1,749.00
10/22/25	TFCA	Telephone call with Foley team regarding employee issue regarding investigation.	1.00	\$1,375.00
10/23/25	EGJ	Draft response to 10-21 Pacific entities letter (1.0); confer with K. Farrar and E. Mazzocco	1.20	\$780.00

separately regarding content of same (.2).

Our Ref. N	Our Ref. No.:100845-0402 Invoice No.: 51190427		Foley & Lardner LLP November 25, 2025	
10/23/25	EPM	Quality control review of documents slated for production (5.2); review questions related to draft joint discovery letter (.8).	6.00	\$5,040.00
10/23/25	ERR	Telephone call with M. Kemner and special insurance counsel regarding potential claims notification of defense and indemnity obligations regarding cases selected for relief from stay.	0.70	\$770.00
10/23/25	JGAS	Code electronic documents for redaction log in connection with insurance matters within chapter 11 adversary proceeding.	2.20	\$1,210.00
10/23/25	MDL	Telephone conference with C. Haskett (Covington) and E. Ridley regarding insurance coverage issues and status of bankruptcy case.	0.40	\$350.00
10/23/25	MR	Complete initial draft of objections and responses to CIGA's RFPs (1.4); prepare for meet and confer calls with counsel for Travelers and CIGA (.8); review document production received from CIGA (1.5); begin drafting dispute letters in advance of Court's November 4, 2025 submissions deadline in insurance coverage action (1.5).	5.20	\$4,134.00
10/24/25	AMUE	Review of multiple issues related to discovery in advance of 11/4 conference due date with district court (1.2) and strategize to align with bankruptcy case (.5).	1.70	\$1,785.00
10/24/25	EGJ	Perform legal research for discovery dispute letter (2.0); revise draft response to 10-21 Pacific letter (.7).	2.70	\$1,755.00
10/24/25	EPM	Review CIGA RFP responses (1.9); strategize with M. Roberts regarding preparation for meet and confer videoconference with insurers (.3); call with E. Ridley regarding insurance case status (.5); review coverage for state court cases (.8); revise correspondence to insurers regarding state court cases set for stay relief (.5); conduct meet and confer call with Travelers (.5); conduct meet and confer call with CIGA (.5); follow up on meet and confer calls and related action items with team (.5); strategize with A. Uetz regarding privileged insurance issues (.3); outreach to insurers regarding logistics for dispute letter deadline (.3).	6.10	\$5,124.00

Page 32

Our Ref. N	<b>CATHOLI</b> No.:100845- o.: 5119042		Page 33 Foley & Lardner LLP November 25, 2025	
10/24/25	ERR	Create draft letter to Travelers, et al. regarding assignment of defense counsel.	0.80	\$880.00
10/24/25	ERR	Review status of discovery disputes with insurers for report to court.	0.50	\$550.00
10/24/25	JCH	Email correspondence with E. Mazzocco regarding email distribution list for insurance counsel only (.2); prepare email distribution list with insurance counsel only and email same to E. Ridley and E. Mazzocco (.2); revise email distribution list and email same to E. Ridley and E. Mazzocco (.1).	0.50	\$165.00
10/24/25	JGAS	Code electronic documents for redaction log in connection with insurance matters within chapter 11 adversary proceeding.	3.30	\$1,815.00
10/24/25	KAFA	Update chart of responses to Chubb's questions regarding specific alleged abusers and what documents were collected and produced.	0.50	\$225.00
10/24/25	MR	Prepare for meet and confer videoconferences with counsel for Travelers and CIGA (1.6); attend meet and confer with Travelers' counsel (.5); attend meet and confer with CIGA's counsel (.5); email communications with insurer defendants regarding meet and confer calls (.2); draft discovery dispute letters in advance of Judge Corley's November 4, 2025 submission deadline (1.6).	4.40	\$3,498.00
10/25/25	JGAS	Code electronic documents for redaction log in connection with insurance matters within chapter 11 adversary proceeding.	2.80	\$1,540.00
10/26/25	EPM	Correspondence with insurers regarding interim deadlines associated with November 4, 2025 dispute letter deadline.	0.50	\$420.00
10/26/25	ERR	Edit letter to insurers on Woodall case and communicate with M. Kemner regarding same.	1.00	\$1,100.00
10/26/25	JGAS	Code electronic documents for redaction log in connection with insurance matters within chapter 11 adversary proceeding.	2.40	\$1,320.00

0.50

\$525.00

Provide direction to Foley team regarding privileged insurance/discovery issue.

10/27/25

**AMUE** 

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 34 Foley & Lardner LLF November 25, 2025	
10/27/25	EPM	Quality control review of documents slated for production (2.5); investigate insurer discovery inquiries (1.2); follow-up correspondence to insurers regarding discovery inquiries coming out of meet and confer calls (1.7); confer with E. Ridley regarding open insurance discovery issues (.2); preparation for meet and confer call with CNA (.3).	5.90	\$4,956.00
10/27/25	ERR	Edit discovery letter to Chubb regarding proofs of claim.	0.70	\$770.00
10/27/25	ERR	Edit coverage letters to insurers regarding Woodall defense.	1.00	\$1,100.00
10/27/25	ERR	Telephone call with client and Covington regarding case issues and claims.	0.80	\$880.00
10/27/25	ERR	Edit discovery responses to written discovery requests from CIGA.	0.80	\$880.00
10/27/25	KAFA	Assist E. Mazzocco and M. Roberts with information for Chubb responses including Clergy III video depositions and plaintiff productions (1.7); prepare insurance policies for E. Ridley (.8).	2.50	\$1,125.00
10/27/25	MR	Continue drafting discovery dispute letters for submission to Judge Corley in advance of November 4, 2025 submission deadline, including analysis of further case law supporting key points in same (2.6); communicate with E. Mazzocco regarding privileged discovery and document production matters in insurance coverage action (.2); review documents for potential production in insurance coverage action (1.3); strategize with K. Farrar regarding same (.3); prepare for October 28, 2025 meet and confer call with counsel for CNA (.8); review email communications from insurers regarding follow-up items stemming from recent meet and confer calls (.2).	5.40	\$4,293.00
10/28/25	EPM	Prepare for insurer meet and confer calls (1.1); conduct meet and confer call with CNA (1.0); call with M. Roberts regarding action items related to insurer meet and confer calls (.3); review responses to CIGA requests for production (1.1); review correspondence to insurers regarding meet and confer efforts (.5); quality control review of documents slated for production (1.1).	5.10	\$4,284.00

ROMAN CATHOLIC BISHOP OF OAKLAND	Page 35
Our Ref. No.:100845-0402	Foley & Lardner LLP
Invaige No. 51100427	November 25, 2025

Invoice No	b.: 5119042			mber 25, 2025
10/28/25	ERR	Respond to inquiries regarding insurer discovery and defense of state cases.	0.70	\$770.00
10/28/25	ERR	Review status of defense counsel regarding state cases.	0.50	\$550.00
10/28/25	ERR	Edit case management statement regarding insurance issues.	0.80	\$880.00
10/28/25	MR	Complete preparation for meet and confer call with counsel for CNA (.7); attend meet and confer call with counsel for CNA regarding discovery issues in insurance coverage action (1.0); revise draft objections and responses to CIGA's requests for production in insurance coverage action (.8); further email communications with counsel for insurer defendants regarding various follow-up items from prior meet and confer calls, in advance of Court's November 4, 2025 deadline to submit discovery dispute letters (.6); perform QC review of draft redaction log entries (1.2).	4.30	\$3,418.50
10/29/25	EPM	Quality control review of documents slated for production.	3.20	\$2,688.00
10/29/25	MR	Draft further follow-up correspondence to counsel for various insurer defendants in insurance coverage action, regarding issues discussed during meet and confer calls (.8) perform QC review of redaction log entries (1.3); revise, finalize and serve objections and responses to CIGA's requests for production (1.2).	3.30	\$2,623.50
10/30/25	EPM	Privileged discussions with case team regarding hearing on motion to dismiss the bankruptcy and resulting action items (.5); call with E. Ridley regarding upcoming tasks in insurance case (.5); calls with insurer counsel regarding deadlines in insurance case (.3); draft stipulation to extend November 4, 2025 deadline to submit dispute letters (3.3).	4.60	\$3,864.00
10/30/25	ERR	Review strategy regarding continuance of disputes submittals to Judge Corley.	0.50	\$550.00
10/30/25	ERR	Communication with M. Kemner regarding strategy regarding post-dismissal and insurance settlement.	0.50	\$550.00

Case: 23-40523 Doc# 2464 Filed: 11/25/25 of 60 Entered: 11/25/25 15:10:32 Page 43

#### ROMAN CATHOLIC BISHOP OF OAKLAND Page 36 Our Ref. No.:100845-0402 Foley & Lardner LLP Invoice No.: 51190427 November 25, 2025 10/30/25 **ERR** Telephone call with M. Kemner regarding 0.50 \$550.00 strategy regarding settlement with insurers. Draft further communications to insurer 10/30/25 MR 1.30 \$1,033.50 defendants in insurance coverage action regarding document productions and discovery (.5); perform QC review of draft redaction log (.8). 10/30/25 SJM Email correspondence with E. Mazzocco and E. 0.50 \$437.50 Ridley regarding wording of District Court stipulation regarding status of bankruptcy case. 10/31/25 **EPM** Draft correspondence to client regarding 5.00 \$4,200.00 insurance deadlines strategy (.2); correspondence with insurers regarding stipulation to extend dispute letters deadline (.9); internal privileged discussions regarding insurer written discovery responses (.5); review legal research in support of discovery dispute letters (1.2); quality control review of documents slated for production (1.8); review written discovery responses from U.S. Fire (.4).10/31/25 **ERR** Communication with M. Kemner regarding case 1.00 \$1,100.00 status, on-going settlement discussions and overall insurance strategy. 10/31/25 **ERR** Attend mediation with T. Gallagher. 1.00 \$1,100.00 10/31/25 **ERR** Review discovery issues with insurers including 0.80 \$880.00 stipulation to push out controversy letters. 10/31/25 MR Review documents in connection with potential 2.40 \$1,908.00 supplemental production to insurer defendants in insurance coverage action (.5); review written

262.30

\$213,503.50

Task Total:

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 44

discovery responses received from U.S. Fire (.5); perform QC review of draft redaction log (1.4).

# ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 37 Foley & Lardner LLP November 25, 2025	
032 Rule	2004 Motio	ons/Discovery/Subpoenas		
10/02/25	KAFA	Prepare client documents for production to BRG/Lowenstein/A&M group.	0.40	\$180.00
10/28/25	KAFA	Prepare client documents for production to BRG/Lowenstein/A&M group.	0.30	\$135.00
		Task Total:	0.70	\$315.00
034 Othe	r Motion P	ractice		
10/01/25	MRL	Continue drafting the reply to the Committee's objection to the motion to dismiss.	1.20	\$810.00
10/01/25	SJM	Prepare for hearing on motion to approve extension of time to assume or reject CCCEB lease (.5); attend hearing (.8).	1.30	\$1,137.50
10/02/25	MCM	Analysis of issues concerning motion to dismiss chapter 11 case (.6); meeting with M. Rofaeil regarding response to same and strategy for filing (.5).	1.10	\$1,017.50
10/02/25	MRL	Continue drafting the reply to the Committee's objection to the motion to dismiss (2.3); confer with M. Moore regarding strategies for the Debtor's response to the Committee's objection (.5).	2.80	\$1,890.00
10/03/25	MCM	Continue working on analysis of issues in connection with Committee filings on motion to dismiss.	0.80	\$740.00
10/03/25	MRL	Continue drafting the reply to the Committee's objection to the motion to dismiss.	2.70	\$1,822.50
10/04/25	MCM	Review draft response to Committee filings in connection with motion to dismiss chapter 11 case.	0.40	\$370.00
10/04/25	MRL	Finalize the reply to the Committee's objection to the motion to dismiss.	0.70	\$472.50
10/05/25	MCM	Revise draft response to Committee filings in connection with motion to dismiss chapter 11 case.	1.00	\$925.00

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Our Ref. N	CATHOLI Io.:100845- o.: 5119042	Page 38 Foley & Lardner LLP November 25, 2025		
10/07/25	MCM	Analyze order entered following status conference on October 6 (.5); further revisions to Debtor's response to Committee filings (.4).	0.90	\$832.50
10/08/25	EPK	Advise M. Rofaeil regarding certain representations to be made in RCBO's response to the Committee's objection to the motion to dismiss.	0.30	\$262.50
10/08/25	MCM	Additional revisions to response to Committee filing/quasi-motion on bad faith in RCBO bankruptcy case (1.5); email correspondence with M. Rofaeil regarding same (.3).	1.80	\$1,665.00
10/08/25	MRL	Revise the Debtor's reply to the Committee's objection to the motion to dismiss to conform to M. Moore's comments (1.3); confer with M. Moore regarding revisions to the Debtor's reply to the Committee's objection to the motion to dismiss (.2); confer with E. Khatchatourian regarding certain revisions to the reply (.2); draft the declaration in support of the reply (.4).	2.10	\$1,417.50
10/09/25	MCM	Review draft declaration in support of response to Committee's bad-faith filing in RCBO bankruptcy case.	0.50	\$462.50
10/09/25	MDL	Revise reply in support of motion to dismiss.	0.70	\$612.50
10/09/25	MRL	Continue drafting the declaration in support of the Debtor's reply to the Committee's objection to the motion to dismiss.	0.70	\$472.50
10/13/25	MCM	Review issues concerning response to Committee's bad-faith filings in RCBO bankruptcy case.	0.40	\$370.00
10/15/25	MDL	Revise reply brief in support of motion to dismiss.	0.20	\$175.00
10/16/25	MCM	Review issues concerning motion to dismiss and Committee arguments regarding bad faith.	0.70	\$647.50
10/17/25	MDL	Revise reply brief in support of motion to dismiss.	1.10	\$962.50
10/18/25	MCM	Email correspondence with M. Lee, S. Moses, and M. Rofaeil regarding finalization of response to Committee filings regarding bad faith in context of dismissal of bankruptcy case (.4); review revisions to same prior to filing (.3).	0.70	\$647.50

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 46 of 60

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 39 Foley & Lardner LLP November 25, 2025	
10/18/25	MDL	Continue revising reply brief in support of motion to dismiss.	0.80	\$700.00
10/19/25	MCM	Email correspondence with Foley team regarding finalization of response to Committee filings regarding bad faith in context of dismissal of bankruptcy case.	0.50	\$462.50
10/19/25	MRL	Email correspondence with the Foley team regarding the Debtor's response to the Committee's objection to the motion to dismiss.	0.30	\$202.50
10/20/25	AMUE	Revise reply brief in support of motion to dismiss.	2.20	\$2,310.00
10/20/25	JCH	Revise reply to add table of contents and table of authorities (.5); finalize and file reply and declarations in support (.5).	1.00	\$330.00
10/20/25	MCM	Review revised reply to Committee statement regarding motion to dismiss bankruptcy case and supporting declarations.	0.50	\$462.50
10/20/25	MDL	Strategize with S. Moses and M. Rofaeil regarding support for reply brief on motion to dismiss.	0.60	\$525.00
10/20/25	MDL	Revise M. Lee declaration in support of reply brief on motion to dismiss.	0.10	\$87.50
10/20/25	MDL	Revise A. Bardos declaration in support of reply brief on motion to dismiss.	0.20	\$175.00
10/20/25	MDL	Revise reply brief in support of motion to dismiss.	2.80	\$2,450.00
10/20/25	MRL	Email correspondence with the Foley team regarding the Debtor's response to the Committee's objection to the motion to dismiss case (.4); confer with M. Lee regarding revisions to the response (.1); confer with M. Lee and S. Moses regarding declarations in support of the response (.6); draft the M. Lee declaration in support of the response (1.2); revise the response to conform to M. Lee's comments (.8).	3.10	\$2,092.50

Our Ref. N	Jo.:100845-0 o.: 51190427		•	Lardner LLP mber 25, 2025
10/20/25	SJM	Assist with revisions to response to Committee request for dismissal with prejudice (5.6); revise declaration of A. Bardos in support of same (1.3); call with M. Lee and M. Rofaeil regarding finalizing response (.6); further revise declarations of A. Bardos and M. Lee in support of same (.8); email to A. Bardos regarding draft response (.3); final review of response in preparation for filing (.6); email to client regarding filed response (.3).	9.50	\$8,312.50
10/21/25	MCM	Prepare for hearing on motion to dismiss chapter 11 bankruptcy case.	0.50	\$462.50
10/22/25	MDL	Strategize with S. Moses regarding potential evidentiary presentations at motion to dismiss hearing.	0.20	\$175.00
10/22/25	SJM	Review local rules and evaluate approach to evidence for motion to dismiss (.4); call with M. Lee regarding same (.2); draft email to case team regarding analysis of same (.6).	1.20	\$1,050.00
10/23/25	AMUE	Prepare for contested hearing on motion to dismiss (1.4); meeting with Foley team regarding strategy (.4) (partial); analyze strategy related to privileged issue concerning motion to dismiss (1.1).	2.90	\$3,045.00
10/23/25	MCM	Prepare for oral argument on motion to dismiss and Committee counter-motion for dismissal with bad-faith finding and prejudice against refiling.	1.50	\$1,387.50
10/23/25	MDL	Strategize for motion to dismiss hearing including possible witness testimony.	1.00	\$875.00
10/23/25	MDL	Draft correspondence to Lowenstein and Keller regarding allegations concerning Livermore Property.	1.30	\$1,137.50
10/23/25	MDL	Evaluate possible response to Committee's false statements on Livermore Property disclosures.	0.30	\$262.50
10/23/25	SJM	Call with A. Uetz, M. Lee, and M. Moore regarding mediation status and motion to dismiss hearing.	1.10	\$962.50
10/24/25	MCM	Analyze latest Committee proposal in context of case resolution and preparation for hearing on motion to dismiss.	1.50	\$1,387.50

Page 40

Our Ref. N	ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 41 Foley & Lardner LLP November 25, 2025	
10/24/25	MDL	Revise email to Lowenstein and Keller regarding Livermore Property evidence.	1.00	\$875.00	
10/24/25	MRL	Analyze cases regarding dismissal of bankruptcy cases.	1.50	\$1,012.50	
10/25/25	MRL	Continue analyzing cases regarding dismissal of bankruptcy cases (.3); draft an email to M. Moore regarding the cases (.3).	0.60	\$405.00	
10/26/25	MCM	Email correspondence regarding hearing on motion to dismiss and related issues (.4); prepare and transmit requested information in connection with same (.4).	0.80	\$740.00	
10/27/25	JCH	Compile pleadings related to hearing on October 29 and send zip file of same to A. Uetz.	0.50	\$165.00	
10/27/25	MCM	Analyze Committee filing in connection with motion to dismiss and request for bad-faith finding and bar against future bankruptcy filings by diocese.	1.00	\$925.00	
10/27/25	MRL	Continue analyzing cases regarding dismissal of bankruptcy cases (.9); analyze the Committee's reply to the objection to the motion to dismiss (.3); correspond with M. Moore regarding the Committee's reply (.2).	1.40	\$945.00	
10/27/25	SJM	Analyze Committee reply in support of dismissal with prejudice (.7); email correspondence with case team regarding same (.4).	1.10	\$962.50	
10/27/25	SJM	Call with R. Manns regarding status of case and motion to dismiss hearing.	0.80	\$700.00	
10/28/25	MCM	Email correspondence with Foley team regarding hearing on motion to dismiss in RCBO bankruptcy case.	0.50	\$462.50	
10/28/25	SJM	Research regarding law on bad faith and dismissal with prejudice in order to distinguish new cases cited by Committee (4.3); prepare detailed outline of rebuttal arguments on dismissal with prejudice (2.9).	7.20	\$6,300.00	
10/28/25	TND	Research on cases regarding laches as a defense to a motion to dismiss a bankruptcy case for hearing	1.90	\$1,520.00	

on motion to dismiss.

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 42 Foley & Lardner LLI November 25, 2025	
10/29/25	SJM	Assist with preparation for hearing on motion to dismiss (1.2); meet with A. Uetz and M. Lee in preparation for hearing (.7).	1.90	\$1,662.50
10/29/25	TND	Email information to A. Uetz for hearing on motion to dismiss.	0.10	\$80.00
10/30/25	MRL	Review email correspondence from A. Uetz regarding status of the motion to dismiss case.	0.30	\$202.50
		Task Total:	75.80	\$63,525.00
035 Gene	eral Counse	el Matters		
10/14/25	AKT	Review details provided by A. Uetz regarding privileged issue (.4); prepare instructions for IT support (.6); draft privileged communication templates for client use (.4).	1.40	\$1,855.00
10/15/25	AKT	Review findings on privileged issue (.8); analyze email details (.7); coordinate with A. Bardos, M. Kemner, and A. Uetz regarding next steps and documentation (.4).	1.90	\$2,517.50
10/20/25	LPM	Prepare contract template for a consultant per request of S. Martinez.	0.20	\$163.00
10/23/25	AKT	Additional review of emails (.5); prepare notification chart for client (.7); summarize findings for client (.4).	1.60	\$2,120.00
10/23/25	LPM	Prepare template short form consultant agreement for use with consultants performing professional services for construction projects for RCBO.	1.20	\$978.00
10/28/25	AKT	Review attachment inventory (.4); analyze information with respect to notice (.6).	1.00	\$1,325.00
10/28/25	LBRA	Analyze documents related to privileged issue (2.5); draft potential notice list and proposed next steps (1.3).	3.80	\$2,660.00
10/31/25	JJK	Review St. Joseph Catholic directory listing.	0.60	\$585.00
		Task Total:	11.70	\$12,203.50

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 50 of 60

subjects.

10/02/25

SJM

Our Ref. No.:100845-0402

Invoice No.: 51190427 November 25, 2025 038 Mediation 10/01/25 **AMUE** 5.10 Communications with client regarding privileged \$5,355.00 mediation matter (1.0); communication with R. Newsome regarding mediation (.4); correspondence to Bishop Barber regarding privileged mediation matter and recommendation (1.5); review information comparing terms of insurance assignment (1.0); review request from insurer regarding mediation matter to analyze advice regarding same and communications with Foley team regarding same (1.2). 10/01/25 ERR Review all correspondence from insurers and 2.00 \$2,200.00 mediation strategy. 10/01/25 **MDL** Strategize for upcoming mediation with respect to 0.90 \$787.50 specific confidential mediation issues. 10/01/25 **MDL** Revise letter to Bishop Barber regarding 1.50 \$1,312.50 mediation update and strategy in light of recent communications with mediators and other parties. 10/01/25 **MDL** Strategize regarding approach to Chubb demand 1.40 \$1,225.00 for Committee settlement proposal. 10/02/25 **AMUE** Prepare for (.5) and meet with mediators and 1.50 \$1,575.00 Committee regarding mediation issue (1.0). 0.90 10/02/25 **ERR** Review status and analysis letter to Bishop Barber \$990.00 regarding mediation as well as authority regarding settlement demands communicated to plaintiff. 10/02/25 **ERR** Attend conference call with all mediators and 1.00 \$1,100.00 Committee representatives regarding mediation and insurance issues. 10/02/25 **ERR** Review communications regarding preparation for 1.40 \$1,540.00 mediations. 10/02/25 **MDL** Strategize with Foley team regarding mediation 0.30 \$262.50 strategy and positions on confidential mediation

Page 43

Foley & Lardner LLP

1.00

\$875.00

Call with chambers regarding request for

mediation privilege issue (.5).

emergency hearing on mediation privilege issues (.2); draft email to chambers regarding same (.3); email correspondence with case team regarding

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427		Page 44 Foley & Lardner LLP November 25, 2025		
10/02/25	SJM	Attend remote mediation session (partial) (.7); email to A. Uetz and E. Ridley regarding notes from same (.5).	1.20	\$1,050.00
10/03/25	ERR	Review communications with Judge Sontchi.	0.50	\$550.00
10/03/25	ERR	Review additional materials regarding mediation.	1.00	\$1,100.00
10/03/25	MDL	Strategize for mediation with A. Uetz.	0.50	\$437.50
10/03/25	MDL	Strategize with Foley team regarding unique insurer mediation issues.	0.40	\$350.00
10/03/25	MDL	Telephone conference with T. Schiavoni (O'Melveny) regarding confidential mediation topic.	0.60	\$525.00
10/05/25	AMUE	Prepare for mediation.	2.50	\$2,625.00
10/05/25	ERR	Attend call with Judge Sontchi and review strategy for mediation.	1.00	\$1,100.00
10/05/25	MDL	Email exchange with Judge Sontchi and A. Uetz regarding confidential mediation issue.	0.20	\$175.00
10/06/25	AMUE	Prepare for mediation (5.5); review privileged documents to assess mediation position (1.5).	7.00	\$7,350.00
10/06/25	MCM	Email correspondence with Foley team and other parties regarding resumed mediations.	0.60	\$555.00
10/06/25	MDL	Correspondence with T. Schiavoni, S. Warren, and J. Daniels (all of O'Melveny) regarding Committee settlement offer.	0.50	\$437.50
10/06/25	MDL	Strategize for mediation sessions on October 7 and 8.	0.90	\$787.50
10/06/25	MDL	Telephone conference with T. Gallagher regarding production of Committee settlement offer in advance of mediation sessions.	0.10	\$87.50
10/06/25	SJM	Assist with preparation for October 7 mediation.	2.30	\$2,012.50
10/07/25	AMUE	Appearance at mediation (8.0); debrief with Foley team (2.0).	10.00	\$10,500.00
10/07/25	ERR	Attend Day #1 mediation at Gallagher office and edit letters to insurers regarding discovery issues.	8.00	\$8,800.00

ROMAN CATHOLIC BISHOP OF OAKLAND Our Ref. No.:100845-0402 Invoice No.: 51190427			Page 45 Foley & Lardner LLP November 25, 2025	
10/07/25	MDL	Telephone conference with D. Flanagan regarding real estate valuations and possible scenarios for funding settlement trust.	0.80	\$700.00
10/07/25	MDL	Prepare for (.8) and attend (8.0) first day of mediation session at Gallagher Law Office.	8.80	\$7,700.00
10/08/25	AMUE	Appearance at Day #2 mediation (partial).	6.00	\$6,300.00
10/08/25	ERR	Attend mediation day #2 with T. Gallagher, et al. (partial).	6.00	\$6,600.00
10/08/25	ERR	Review mediators' proposal regarding settlement and text mediator.	0.80	\$880.00
10/08/25	JRBL	Telephone conference with P. Bongiovanni regarding request for carrier reimbursement information (.3); review database for information requested (.6); telephone conference with K. Farrar regarding spreadsheet of carrier payments (.2); communications with P. Bongiovanni regarding answers for mediation (.3).	1.40	\$1,925.00
10/08/25	KAFA	Provide information requested by client (P. Bongiovanni and A. Bardos) regarding prepetition legal spending to Foley and reimbursement from the insurers.	0.70	\$315.00
10/08/25	MCM	Analysis of mediator's proposal.	0.60	\$555.00
10/08/25	MDL	Attend second day of mediation.	9.30	\$8,137.50
10/08/25	MDL	Telephone conference with D. Flanagan regarding cash forecast in light of mediators' proposal.	0.20	\$175.00
10/08/25	SJM	Research regarding privileged issues related to mediation.	2.20	\$1,925.00
10/08/25	TND	Provide fee information to A. Uetz for use in mediation.	0.60	\$480.00
10/09/25	MDL	Evaluate data regarding real estate valuations in light of mediator's proposal.	0.20	\$175.00
10/09/25	MDL	Telephone conference with D. Flanagan regarding projections for payment of mediator's proposal and operational budget post-effective date.	0.80	\$700.00
10/12/25	ERR	Review issues regarding pending mediator's proposal.	0.50	\$550.00

ROMAN (Our Ref. No Invoice No	o.:100845		Page 46 Foley & Lardner LLP November 25, 2025	
10/13/25	ERR	Telephone conference with client regarding pending mediators' proposal.	1.00	\$1,100.00

Invoice No	Invoice No.: 51190427			mber 25, 2025
10/13/25	ERR	Telephone conference with client regarding pending mediators' proposal.	1.00	\$1,100.00
10/13/25	MCM	Conference call with Foley team regarding mediator's proposal and next steps.	0.70	\$647.50
10/13/25	SJM	Supervise M. Rofaeil regarding privileged research question.	1.20	\$1,050.00
10/13/25	TND	Work on calculation of litigation expenses incurred to date by RCBO for abuse-related claims, including both pre- and post-petition amounts.	1.20	\$960.00
10/14/25	AMUE	Communications with M. Kemner regarding privileged issue related to mediation (1.0); analyze privileged issue related to mediation (1.5).	2.50	\$2,625.00
10/14/25	KAFA	Provide information requested by T. Dolcourt regarding fees and expenses paid pre-petition.	0.60	\$270.00
10/14/25	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) regarding confidential mediation issue.	0.40	\$350.00
10/14/25	SJM	Review research from M. Rofaeil regarding privileged mediation matter (.4); further research regarding same (2.3); draft email memo to A. Uetz and M. Lee regarding same (.6).	3.30	\$2,887.50
10/14/25	TND	Further analysis of litigation fees incurred by RCBO in relation to abuse claims, both before and during bankruptcy.	3.60	\$2,880.00
10/15/25	KAFA	Provide information requested by T. Dolcourt regarding pre-2020 RCBO expenses.	0.20	\$90.00
10/15/25	TND	Email correspondence with client and Foley teams regarding calculation of fees and costs incurred by Debtor for defense of abuse claims.	0.40	\$320.00
10/16/25	MCM	Review email correspondence with mediator regarding proposal status.	0.30	\$277.50
10/16/25	MDL	Email correspondence with mediators regarding confidential mediation topic.	0.10	\$87.50
10/17/25	MDL	Email correspondence with T. Gallagher regarding Pacific Indemnity discovery and information demands.	0.10	\$87.50

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 54 of 60

	Our Ref. No.:100845-0402 Invoice No.: 51190427		Foley & Lardner LLP November 25, 2025	
10/17/25	MDL	Strategize with A. Uetz regarding confidential mediation topic.	0.20	\$175.00
10/21/25	AMUE	Analyze privileged mediation issue related to mediators' proposal.	1.40	\$1,470.00
10/21/25	MDL	Evaluate update from mediators regarding other parties' responses to mediators' proposal and possible next moves absent agreement.	0.30	\$262.50
10/22/25	AMUE	Analyze privileged issue related to mediators' proposal and certain insurers.	1.40	\$1,470.00
10/22/25	MDL	Strategize with A. Uetz regarding settlement proposals and communications with mediators.	0.30	\$262.50
10/23/25	AMUE	Meeting with T. Gallagher (.7); analyze strategy related to settlement (.9).	1.60	\$1,680.00
10/23/25	ERR	Attend conference with mediator (T. Gallagher) regarding status of settlement discussions.	0.80	\$880.00
10/23/25	MCM	Review request for state court counsel information from mediators.	0.40	\$370.00
10/23/25	MDL	Telephone conference with T. Gallagher regarding status of negotiations and mediation efforts.	0.60	\$525.00
10/23/25	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) regarding confidential mediation topic.	0.40	\$350.00
10/23/25	MRL	Confer with M. Moore regarding state court litigation counsel for creditors (.2); analyze the proofs of claim for state court litigation counsel (2.1).	2.30	\$1,552.50
10/24/25	AMUE	Review communication received from mediators regarding Committee response to mediators' proposal (1.3); strategize with M. Lee regarding client communication related to same (.5).	1.80	\$1,890.00
10/24/25	MDL	Analyze new Committee proposal and possible responses to same.	0.30	\$262.50
10/24/25	MRL	Continue analyzing the proofs of claim for state court litigation counsel.	0.80	\$540.00
10/25/25	MRL	Continue analyzing the proofs of claim for state court litigation counsel (1.3); draft an email to M. Moore regarding the same (.2).	1.50	\$1,012.50

Page 47

	Our Ref. No.:100845-0402 Invoice No.: 51190427			& Lardner LLP ember 25, 2025
10/26/25	AMUE	Draft communication to mediators regarding Committee response to mediators' proposal (.8); review Committee's response (.5).	1.30	\$1,365.00
10/26/25	ERR	Review status of settlement negotiations and mediators' proposal.	0.50	\$550.00
10/27/25	MCM	Correspondence with mediator regarding contact information for various parties and satisfaction of information request from same.	0.50	\$462.50
10/27/25	MRL	Review email correspondence from the Foley team regarding state court counsel for claimants.	0.20	\$135.00
10/29/25	MRL	Email correspondence with A. Uetz regarding state court counsel for claimants (.2); analyze certain data for the state court counsel for claimants (.2).	0.40	\$270.00
10/31/25	AMUE	Prepare for (1.3) and appear at (1.2) mediation; meeting with M. Kemner to prepare for same (1.0); multiple email communications with Foley team to prepare for same (1.0).	4.50	\$4,725.00
10/31/25	MDL	Strategize with A. Uetz regarding mediation strategy with insurers.	0.20	\$175.00
10/31/25	MDL	Attend mediation session with insurers and T. Gallagher.	1.20	\$1,050.00
10/31/25	SJM	Prepare mark-up of plan identifying insurance assignment terms.	1.40	\$1,225.00
		Task Total:	133.10	\$129,075.00
		Services Total:	733.70	\$634,350.50

Page 48

### **Professional Services Summary**

Service Provider	Initials	Title	Hours	Rate	Amount
Emily G. Jones	EGJ	Associate	20.20	\$650.00	\$13,130.00
James G. Austin	JGAS	Associate	12.90	\$550.00	\$7,095.00
Leighton B. Allen	LBRA	Associate	3.80	\$700.00	\$2,660.00
Michael H. Holland	MHH	Associate	0.70	\$650.00	\$455.00
Mason Roberts	MR	Associate	61.30	\$795.00	\$48,733.50
Mary Rofaeil	MRL	Associate	26.90	\$675.00	\$18,157.50

Our Ref. No.:100845-0402 Invoice No.: 51190427

Page 49 Foley & Lardner LLP November 25, 2025

Shane J. Moses	SJM	Of Counsel	99.20	\$875.00	\$86,800.00
Janelle C. Harrison	JCH	Paralegal	20.80	\$330.00	\$6,864.00
Kerry A. Farrar	KAFA	Paralegal	19.30	\$450.00	\$8,685.00
Aaron K. Tantleff	AKT	Partner	5.90	\$1,325.00	\$7,817.50
Ann Marie Uetz	AMUE	Partner	112.60	\$1,050.00	\$118,230.00
Emil P. Khatchatourian	EPK	Partner	15.70	\$875.00	\$13,737.50
Eileen R. Ridley	ERR	Partner	71.50	\$1,057.69	\$75,625.00
Geoffrey S. Goodman	GSG	Partner	0.40	\$1,050.00	\$420.00
Jason J. Kohout	JJK	Partner	0.60	\$975.00	\$585.00
Jeff R. Blease	JRBL	Partner	1.40	\$1,375.00	\$1,925.00
Mark C. Moore	MCM	Partner	35.80	\$925.00	\$33,115.00
Matthew D. Lee	MDL	Partner	64.80	\$875.00	\$56,700.00
Thomas F. Carlucci	TFCA	Partner	1.30	\$1,375.00	\$1,787.50
Alan R. Ouellette	AROU	Senior Counsel	4.20	\$875.00	\$3,675.00
Elizabeth P. Mazzocco	EPM	Senior Counsel	115.30	\$840.00	\$96,852.00
Laura P. Mikeworth	LPM	Senior Counsel	1.40	\$815.00	\$1,141.00
Tamar N. Dolcourt	TND	Special Counsel	37.70	\$800.00	\$30,160.00
Totals			733.70		\$634,350.50

#### **Expenses Incurred**

Description	Amount
Electronic Legal Research Services	\$329.47
LSS - eDiscovery Services	\$12,400.00
Meals	\$588.64
Other Expenses	\$200.00
Service Fees	\$40.00
Shipping Charges	\$87.42
Transportation / Travel Expenses	\$4,990.90
<b>Expenses Incurred Total</b>	\$18,636.43

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.

Description

Our Ref. No.:100845-0402 Invoice No.: 51190427 Page 50 Foley & Lardner LLP November 25, 2025

Amount

#### **Expense Detail**

#### **Electronic Legal Research Services**

Date	<b>Initials</b>	Description	Amount
10/31/25	SJM	US TREATISES DOC ACCESS.	\$329.47
		Docket Report.	
		US PRACTICE GUIDES DOC ACCESS.	
		Westlaw.	
		SEARCH ACCESS CHARGE.	

#### LSS - eDiscovery Services

Initials

**Date** 

10/31/25	JRBL	LSS - eDiscovery Services.	\$12,400.00
Meals			
Date	Initials	Description	Amount
10/06/25	AMUE	Hotel - LunchVENDOR: Ann Marie Uetz 10/06/25 Attendance at mediation Ann Marie Uetz.	\$82.99
10/06/25	ERR	Hotel - DinnerVENDOR: Eileen Ridley 10/06/25 Meal re: attendance at RCBO mediation conducted at JAMS in Los Angeles Eileen Ridley.	\$42.00

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 58

Our Ref. No.:100845-0402 Invoice No.: 51190427 Page 51 Foley & Lardner LLP November 25, 2025

AMUE	Hotel - DinnerVENDOR: Ann Marie Uetz 10/06/25	\$111.46
ERR	Hotel - DinnerVENDOR: Eileen Ridley 10/07/25 Meal re: attendance at RCBO mediation conducted at JAMS in Los	\$111.00
AMUE	Angeles Eileen Ridley. DinnerVENDOR: Ann Marie Uetz 10/08/25 Attendance at mediation Ann Marie Uetz, Eileen Ridley.	\$241.19
		\$588.64
enses		
Initials	Description	Amount
JRBL	-	\$120.00
JRBL	CASE ANYWHERE, LLC - system access fee - 04/04/25.	\$40.00
JRBL	CASE ANYWHERE, LLC - System access fee - 10/01/25.	\$40.00
	<u> </u>	\$200.00
es		
Initials	Description	Amount
JRBL	CASE ANYWHERE, LLC - System access fees - 03/06/25.	\$40.00
Charges		
Initials	Description	Amount
MDL	Federal Express Invoice: 903859124; Tracking: 394053399709; Sender: Matt Lee; Recipient: REY RAMOS FOLEY & LARDNER LLP 1 MARKET PLZ STE 1900 SAN FRANCISCO CA 941051101 US. Federal Express Invoice: 903859124; Tracking: 394053400062; Sender: Matt Lee; Recipient: REY RAMOS FOLEY & LARDNER LLP 1 MARKET PLZ STE 1900 SAN FRANCISCO CA 941051101 US. Federal Express Invoice: 903859124; Tracking: 394053403484; Sender: Matt Lee; Recipient: REY RAMOS FOLEY & LARDNER LLP 1 MARKET PLZ STE 1900 SAN FRANCISCO CA 941051101 US.	\$87.42
	ERR  AMUE  enses  Initials JRBL JRBL JRBL  es  Initials JRBL	Attendance at mediation Ann Marie Uetz. Hotel - DinnerVENDOR: Eileen Ridley 10/07/25 Meal re: attendance at RCBO mediation conducted at JAMS in Los Angeles Eileen Ridley.  DinnerVENDOR: Ann Marie Uetz 10/08/25 Attendance at mediation Ann Marie Uetz, Eileen Ridley.  Enses  Initials  Description  JRBL  CASE ANYWHERE, LLC - System Access fee - 02/04/25. JRBL  CASE ANYWHERE, LLC - System access fee - 04/04/25. JRBL  CASE ANYWHERE, LLC - System access fee - 10/01/25.  Ensitials  Description  CASE ANYWHERE, LLC - System access fees - 03/06/25.  Charges  Initials  Description  MDL  Federal Express Invoice: 903859124; Tracking: 394053399709; Sender: Matt Lee; Recipient: REY RAMOS FOLEY & LARDNER LLP 1 MARKET PLZ STE 1900 SAN FRANCISCO CA 941051101 US. Federal Express Invoice: 903859124; Tracking: 394053400062; Sender: Matt Lee; Recipient: REY RAMOS FOLEY & LARDNER LLP 1 MARKET PLZ STE 1900 SAN FRANCISCO CA 941051101 US. Federal Express Invoice: 903859124; Tracking: 394053403403484; Sender: Matt Lee; Recipient: REY RAMOS FOLEY & LARDNER LLP 1 MARKET PLZ STE 1900 SAN FRANCISCO CA 941051101 US. Federal Express Invoice: 903859124; Tracking: 394053403484; Sender: Matt Lee; Recipient: REY RAMOS FOLEY & LARDNER LLP 1 MARKET PLZ STE 1900 SAN FRANCISCO CA 941051101 US. Federal Express Invoice: 903859124; Tracking: 394053403484; Sender: Matt Lee; Recipient: REY RAMOS FOLEY & LARDNER LLP 1 MARKET PLZ STE 1900 SAN FRANCISCO CA 941051101 US.

### **Transportation / Travel Expenses**

Date	Initials	Description	Amount
10/06/25	MDL	Taxi/Car ServiceVENDOR: Matt Lee - Mediation - MSN to	\$69.56
		LA - 10/06/25-10/09/25.	
10/07/25	<b>AMUE</b>	Taxi/Car ServiceVENDOR: Ann Marie Uetz - Attendance at	\$73.93
		mediation in Los Angeles.	
10/08/25	<b>AMUE</b>	ParkingVENDOR: Ann Marie Uetz - Attendance at	\$20.99
		mediation in Los Angeles.	

Case: 23-40523 Doc# 2464 Filed: 11/25/25 Entered: 11/25/25 15:10:32 Page 59

Our Ref. No.:100845-0402 Invoice No.: 51190427

Page 52 Foley & Lardner LLP November 25, 2025

10/08/25	ERR	LodgingVENDOR: Eileen Ridley - Hotel re: attendance at RCBO mediation conducted at JAMS in Los Angeles - SF/Los	\$893.60
10/08/25	MDL	Angeles - 10/06/25-10/08/25. LodgingVENDOR: Matt Lee - Mediation - MSN to LA -	\$951.38
10/00/25	WIDL	10/06/25-10/09/25.	Ψ/31.36
10/08/25	AMUE	LodgingVENDOR: Ann Marie Uetz - Attendance at mediation in Los Angeles.	\$1,297.98
10/08/25	AMUE	Taxi/Car ServiceVENDOR: Ann Marie Uetz - Attendance at mediation in Los Angeles.	\$92.98
10/08/25	MDL	Taxi/Car ServiceVENDOR: Matt Lee - Mediation - MSN to LA - 10/06/25-10/09/25.	\$75.13
10/09/25	AMUE	Taxi/Car ServiceVENDOR: Ann Marie Uetz - Attendance at mediation in Los Angeles.	\$97.50
10/09/25	MDL	ParkingVENDOR: Matt Lee - Mediation - MSN to LA - 10/06/25-10/09/25.	\$30.00
10/11/25	AMUE	Taxi/Car ServiceVENDOR: Ann Marie Uetz - Attendance at mediation in Los Angeles.	\$198.00
10/16/25	AMUE	AirfareVENDOR: Ann Marie Uetz - Attendance at mediation Detroit/Los Angeles/Detroit.	\$1,189.85
		_	\$4,990.90
		Expense Total:	\$18,636.43