

Joseph M. Breall (SBN 124329)
BREALL & BREALL, LLP
3625 California Street
San Francisco, CA 94118
Telephone: (415) 345-0545
Facsimile: (415) 345-0538
jmbreall@breallaw.com

*Special Insurance Counsel for
the Debtor*

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

In re:

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

Debtor.

CHAPTER 11

CASE No: 23-40523 WJL

HON. WILLIAM J. LAFFERTY

**TWENTY-SIXTH MONTHLY FEE
STATEMENT OF BREALL & BREALL,
LLP, AS SPECIAL INSURANCE COUNSEL
TO THE DEBTOR, FOR ALLOWANCE
AND PAYMENT OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF OCTOBER 1, 2025
THROUGH OCTOBER 31, 2025**

THE ROMAN CATHOLIC BISHOP OF
OAKLAND,

PLAINTIFF,

v.

AMERICAN HOME ASSURANCE CO., a
New York corporation; LEXINGTON
INSURANCE CO., a Delaware corporation,

DEFENDANTS.

ADVERSARY CASE No. 23-04037

Objection Deadline: December 5, 2025
4:00 p.m. (Pacific Time)

[No Hearing Requested]



Name of Applicant:	Breall & Breall, LLP
Authorized to Provide Professional Services to:	Debtor
Date of Retention:	Effective as of August 1, 2023 by Order entered June 15, 2023 [Dkt No. 434]
Period for Which Compensation and Reimbursement is Sought:	OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025
Amount of Compensation Sought as Actual, Reasonable and Necessary ¹ :	\$21,337.50
20% Holdback	\$4,267.50
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary ² :	\$0
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought:	\$17,070.00

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”)³ 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, examiner, or statutory committee has been appointed in this Chapter 11 Case.

On August 17, 2023, the Debtor filed the *Debtor’s Application to Employ Breall & Breall LLP as Special Insurance Counsel Pursuant to 11 U.S.C. §§ 327(a), 331, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Dkt. No. 376] (the “Retention Application”). The Court approved the Retention Application on September 8, 2023, entering the *Order Approving*

¹ Breall & Breall, 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

² Breall & Breall, 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.

³ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Order.

Debtor's Application to Employ Breall & Breall LLP as Special Insurance Counsel Pursuant to 11 U.S.C. §§ 327(a), 331, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure [Dkt. No. 434] (the "Breall Retention Order").

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 "Compensation Procedures Order").

Breall & Breall, LLP ("Breall" or "Applicant"), as special insurance counsel to the Debtor, hereby submits its initial 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 30, 2025 (the "Fee Period") pursuant to the Compensation Procedures Order.

By this Monthly Fee Statement, Breall seeks (i) a monthly interim allowance of compensation in the amount of \$21,337.50 and actual and necessary expenses in the amount of \$0 for a total allowance of \$21,337.50 and (ii) payment of \$17,070.00 (80% of the allowed fees pursuant to the Compensation Procedures Order) and reimbursement of \$0 (100% of the allowed expenses pursuant to the Compensation Procedures Order) for a total payment of \$17,070.00 for the Fee Period.

SERVICES RENDERED AND EXPENSES INCURRED DURING THE FEE PERIOD

Attached as **Exhibit 1** is the name of each of Breall's professionals 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 **Exhibit 3** is a summary of expenses included in this Monthly Fee Statement incurred during the Fee Period.

Attached as **Exhibit 4** are the detailed time entries for Breall's professionals during the Fee

Period.

NOTICE AND OBJECTION PROCEDURES

In accordance with the Compensation Procedures Order, each Notice Party shall have until the tenth (10th) 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.

BREALL & BREALL, LLP

DATED: November 25, 2025

By: /s/ Joseph M. Breall
Joseph M. Breall
Special Insurance Counsel for Debtor,
The Roman Catholic Bishop of Oakland

EXHIBIT 1

Compensation by Professional

OCTOBER 1, 2025 THROUGH 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
Joseph M. Breall	JMB	Partner, 1986	\$750.00	28.45	\$21,337.50
TOTAL					\$21,337.50

EXHIBIT 2

**Compensation by Category
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025**

Category	Hours Billed this Fee Period	Total for Fee Statement
Retention/Billing/Fee Applications for Debtor Professionals	5.70	\$4,275.00
Discovery	6.05	\$4,537.50
Mediation	14.70	\$11,025.00
Other Motion Practice	2.00	\$1,500.00
TOTAL	28.45	\$21,337.50

EXHIBIT 3

**Expense by Category
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025**

Cost/Expense	Amount Billed
	\$0
TOTAL	\$0

EXHIBIT 4

Time

OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033

The Roman Catholic Bishop of Oakland

November 25, 2025
Invoice No: 14890

In Reference To: The Roman Catholic Bishop of Oakland vs .American Home Assurance Co.
Case No.: 23-40523 WJL
Chapter 11

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
<u>Discovery</u>			
10/1/2025	JMB Prepare a response to AHA regarding the defendant's meet and confer regarding discovery.	0.75 750.00/hr	562.50
10/3/2025	JMB Prepare a meet and confer regarding Defendant's discovery response.	1.00 750.00/hr	750.00
	JMB Exchange emails and telephone calls to reschedule the discovery meet and confer telephone call.	0.45 750.00/hr	337.50
10/10/2025	JMB Conference with opposing counsel regarding discovery issues.	0.40 750.00/hr	300.00
10/12/2025	JMB Preparation of an email to co-counsel regarding discovery issues raised in the AHA meet and confer conference.	0.20 750.00/hr	150.00
10/13/2025	JMB Exchange of emails with co-counsel on discovery issues raised by AHA.	0.20 750.00/hr	150.00
10/14/2025	JMB Review and analyze e-mail from co-counsel with new information on discovery and production issues as to AHA.	0.20 750.00/hr	150.00
	JMB Preparation of an email to AHA regarding discovery and document production issues.	0.30 750.00/hr	225.00
	JMB Review and analyze AHA counsel's response to co-counsel on document production issues.	0.40 750.00/hr	300.00
10/15/2025	JMB Review and analyze documents produced to AHA.	0.90 750.00/hr	675.00
10/24/2025	JMB Review and analyze letter regarding discovery issues from AHA counsel.	0.45 750.00/hr	337.50

		<u>Hrs/Rate</u>	<u>Amount</u>
10/27/2025	JMB Reply to emails from AHA counsel regarding meet and confer on discovery issues.	0.20 750.00/hr	150.00
10/28/2025	JMB Exchange emails with co-counsel regarding the meet and confer on discovery issues.	0.20 750.00/hr	150.00
10/29/2025	JMB Exchange emails with AHA counsel regarding the meet and confer on discovery issues.	0.20 750.00/hr	150.00
10/31/2025	JMB Exchange emails with AHA counsel regarding the meet and confer on discovery issues and the extension of discovery letters to the court.	0.20 750.00/hr	150.00
SUBTOTAL:		[6.05	4,537.50]
<u>Mediation</u>			
10/3/2025	JMB Send email to AHA regarding RCBO's position at mediation.	0.20 750.00/hr	150.00
	JMB Exchange email with co-counsel regarding mediation.	0.20 750.00/hr	150.00
10/6/2025	JMB Review and analyze e-mails regarding mediation.	0.20 750.00/hr	150.00
	JMB Send an email to the mediator for the link.	0.10 750.00/hr	75.00
10/7/2025	JMB Attend mediation.	8.00 750.00/hr	6,000.00
10/8/2025	JMB Mediation.	6.00 750.00/hr	4,500.00
SUBTOTAL:		[14.70	11,025.00]
<u>Other Motion Practice</u>			
10/29/2025	JMB Court Appearance - hearing on motion to dismiss.	2.00 750.00/hr	1,500.00
SUBTOTAL:		[2.00	1,500.00]
<u>Retention/Billing/Fee Applications for Debtor Professionals</u>			
10/9/2025	JMB Preparation of pleadings -begin preparation of 6th interim fee application.	2.00 750.00/hr	1,500.00

		<u>Hrs/Rate</u>	<u>Amount</u>
10/10/2025	JMB Preparation of pleadings - prepare declaration in support of 6th interim fee application.	0.50 750.00/hr	375.00
10/13/2025	JMB Preparation of pleadings - statement of no objection to 24th fee statement.	1.00 750.00/hr	750.00
10/15/2025	JMB Preparation of pleadings - finalize and file the 6th interim fee application.	1.00 750.00/hr	750.00
	JMB Preparation of pleadings - finalize and file declaration in support of 6th interim fee application.	0.20 750.00/hr	150.00
10/30/2025	JMB Preparation of pleadings - Fee Statement	1.00 750.00/hr	750.00
SUBTOTAL:		[5.70	4,275.00]
For professional services rendered		28.45	\$21,337.50

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph M. Breall (JMB)	28.45	750.00	\$21,337.50