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Counsel for the Official Committee of Unsecured Creditors

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

In re:

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

Debtor.

Case No. 23-40523 WJL

Chapter 11

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

TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:

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

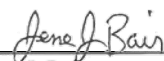
Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement for the Period of October 1, 2025 through October 31, 2025 (the “**Monthly Fee Statement**”). Pursuant to the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. 170] (the “**Interim Fee Order**”)¹ entered by the Court on June 23, 2023, the total legal fees and costs expended by Burns Bair on account of the Committee is as follows:

Period	Fees	Expenses	Total
October 1, 2025 through October 31, 2025	\$107,909.00	\$9,130.92	\$117,039.92
Net Total Allowed Payments this Statement Period: (80% of Fees and 100% of Costs)	\$86,327.20	\$9,130.92	\$95,458.12

The itemized billing statement for the fees and costs billed is attached hereto as **Exhibit A**. Notice Parties have ten (10) days from the date of service of this Monthly Fee Statement to file an objection thereto. If no objection is filed, Burns Bair may file a certificate of no objection (or if an Objection was timely served, a certificate of partial objection) with the Court after which the Debtor, without further order of the Court, shall pay Burns Bair an amount equal to the lesser of: (1) 80% of the fees and 100% of the expenses requested in the Monthly Fee Statement, and (2) if an Objection was served, 80% of the fees and 100% of the expenses to which there was no Objection no later than five (5) business days after the filing of the relevant certificate.

Dated: December 1, 2025

BURNS BAIR LLP

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

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

EXHIBIT A

Burns | Bair

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

The Roman Catholic Bishop of Oakland UCC

Issue Date : 11/30/2025

Bill # : 02077

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/10/2025	Timothy Burns	Participate in Committee meeting re mediation strategy and negotiation status (1.2);	1.20	\$1,344.00
10/23/2025	Timothy Burns	Participate in state court counsel meeting for insurance purposes re ongoing mediation issues (.7);	0.70	\$784.00
10/23/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation issues and ongoing negotiations (.7);	0.70	\$630.00
10/24/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, ongoing negotiations, and next-steps (1.1);	1.10	\$990.00
10/27/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments and strategy (1.1);	1.10	\$990.00
10/30/2025	Jesse Bair	Participate in portion of state court counsel meeting re outcome of motion to dismiss hearing and case next-steps (.6);	0.60	\$540.00
10/31/2025	Jesse Bair	Prepare for Committee meeting (.1); participate in Committee meeting for insurance purposes re motion to dismiss hearing outcome, case strategy, and next-steps (.8);	0.90	\$810.00
10/31/2025	Timothy Burns	Participate in Committee meeting for insurance purposes re motion to dismiss hearing outcome and next-steps (.8);	0.80	\$896.00
Totals for Committee Meetings			7.10	\$6,984.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/3/2025	Jesse Bair	Correspond with G. Albert re interim fee application edits (.1);	0.10	\$90.00
10/13/2025	Jesse Bair	Correspond with KBK re interim fee application edits (.1);	0.10	\$90.00
10/14/2025	Jesse Bair	Review and edit revised version of interim fee application and accompanying materials (.6);	0.60	\$540.00
10/14/2025	Brenda Horn-Edwards	Revise Burns Bair Sixth Interim Fee Application and associated exhibits (.4);	0.40	\$136.00
10/30/2025	Jesse Bair	Review and edit monthly fee statement and correspond with KBK re same (.2);	0.20	\$180.00
10/30/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and correspond with J. Bair re same (.3);	0.30	\$102.00
Totals for Fee Applications			1.70	\$1,138.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/6/2025	Jesse Bair	Participate in hearing re case insurance mediation issue (1.1);	1.10	\$990.00
10/29/2025	Timothy Burns	Participate in motion to dismiss hearing for insurance purposes (2.6);	2.60	\$2,912.00
10/29/2025	Jesse Bair	Attend motion to dismiss hearing for insurance purposes via Zoom (1.9);	1.90	\$1,710.00
Totals for Hearings			5.60	\$5,612.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/1/2025	Timothy Burns	Review correspondence with the Committee and Committee professionals re mediation and case developments (.2);	0.20	\$224.00
10/1/2025	Jesse Bair	Review Chubb letter re mediation request and review and respond to correspondence with Committee professionals and the debtor re same (.3);	0.30	\$270.00
10/1/2025	Timothy Burns	Review correspondence between insurers and Court in adversary proceeding re discovery dispute deadline (.2);	0.20	\$224.00
10/1/2025	Timothy Burns	Review correspondence with state court counsel re JCCP intervention issues (.1);	0.10	\$112.00
10/1/2025	Timothy Burns	Review and respond to correspondence with Debtor re mediation-related request from insurer(.3); follow-up correspondence with M. Lee re same (.1);	0.40	\$448.00
10/1/2025	Timothy Burns	Participate in call with state court counsel re mediation developments and insurer negotiations (.4);	0.40	\$448.00

10/1/2025	Timothy Burns	Correspondence with T. Gallagher re mediation (.1);	0.10	\$112.00
10/1/2025	Timothy Burns	Participate in call with B. Weisenberg re mediation issues (.2);	0.20	\$224.00
10/2/2025	Timothy Burns	Participate in conference with mediator re ongoing mediation negotiations (.3); review related correspondence with T. Gallagher re same (.2);	0.50	\$560.00
10/2/2025	Timothy Burns	Review and respond to various correspondence re Debtor's request for court hearing re mediation issues (.6);	0.60	\$672.00
10/2/2025	Timothy Burns	Multiple conferences with J. Prol re Debtor's request for hearing re mediation issues (.4);	0.40	\$448.00
10/2/2025	Timothy Burns	Analyze insurer targets and develop negotiation strategy for mediation (.6);	0.60	\$672.00
10/2/2025	Timothy Burns	Participate in call with state court counsel re Debtor's request for court hearing re mediation issues (.2);	0.20	\$224.00
10/2/2025	Timothy Burns	Prepare draft correspondence to Court re Debtor's request for court hearing re mediation issues (.4);	0.40	\$448.00
10/2/2025	Timothy Burns	Attend mediation session re Debtor's request for court hearing re mediation issues (.7);	0.70	\$784.00
10/2/2025	Jesse Bair	Review briefing and hearing issues in connection with the insurers' lift stay appeal (.2);	0.20	\$180.00
10/2/2025	Jesse Bair	Participate in call with the mediator re ongoing insurance negotiations (.3); formulate potential next-steps in connection with same (.2);	0.50	\$450.00
10/2/2025	Jesse Bair	Develop revised insurer exposure assessments for use during upcoming mediation session and draft overview summarizing same (.8);	0.80	\$720.00
10/2/2025	Jesse Bair	Prepare for Zoom mediation session with the mediators and debtor (.2); participate in Zoom mediation session with the debtor and mediators re insurer demand (.7);	0.90	\$810.00
10/2/2025	Timothy Burns	Multiple calls with T. Gallagher re Debtor's request for hearing re mediation issues (.5);	0.50	\$560.00
10/2/2025	Timothy Burns	Prepare for mediation session re Debtor's request for court hearing re mediation issues (.8);	0.80	\$896.00
10/2/2025	Timothy Burns	Participate in call with T. Gallagher re mediation issues (.2);	0.20	\$224.00

10/2/2025	Timothy Burns	Review and respond to additional correspondence with the mediators, Debtor, and Chubb re mediation dispute (.4);	0.40	\$448.00
10/2/2025	Timothy Burns	Review insurer correspondence to court in insurance adversary (.1);	0.10	\$112.00
10/2/2025	Karen DempSKI	Docket/calendar status conference (.1);	0.10	\$34.00
10/2/2025	Jesse Bair	Review and respond to various correspondence with the debtor, Chubb, and Court re mediation dispute (.6);	0.60	\$540.00
10/2/2025	Timothy Burns	Preparation for upcoming mediation session (.5);	0.50	\$560.00
10/2/2025	Timothy Burns	Participate in calls with C. Sonthci re Debtor's request for hearing re mediation issues (.4);	0.40	\$448.00
10/2/2025	Timothy Burns	Review and respond to various correspondence with Committee professionals re draft response to Debtor's request for court hearing re mediation issues (.4);	0.40	\$448.00
10/3/2025	Timothy Burns	Review correspondence with mediators, Court, and parties re upcoming hearing (.2);	0.20	\$224.00
10/3/2025	Timothy Burns	Participate in call with Committee professionals re strategy and preparations for upcoming hearing and all-hands mediation session (.7);	0.70	\$784.00
10/3/2025	Timothy Burns	Review correspondence with Committee professionals and the Committee re mediation issues (.2);	0.20	\$224.00
10/3/2025	Timothy Burns	Participate in call with T. Gallagher re mediation negotiations and developments (.2); participate in call with state court counsel re same (.1);	0.30	\$336.00
10/3/2025	Jesse Bair	Participate in call with Committee professionals re mediation dispute, Court hearing re same, and preparations and strategy for upcoming all-hands session (.7);	0.70	\$630.00
10/3/2025	Timothy Burns	Review correspondence with Committee professionals re appellate response brief (.2);	0.20	\$224.00
10/3/2025	Jesse Bair	Begin preparing for hearing re mediation dispute (.2);	0.20	\$180.00
10/3/2025	Jesse Bair	Review additional correspondence with the Court, mediators, and parties re mediation dispute hearing (.2);	0.20	\$180.00
10/3/2025	Erin Quick	Finalize Committee's draft lift stay opposition brief (.8); review and respond to various correspondence with Committee professionals re same (.4);	1.20	\$660.00

10/3/2025	Jesse Bair	Review and edit revised draft of the Committee's lift stay appeal opposition and request for judicial notice in connection with same (.5); review and respond to correspondence with Committee professionals and state court counsel re same (.2);	0.70	\$630.00
10/5/2025	Jesse Bair	Review mediator's proposal and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
10/6/2025	Timothy Burns	Review correspondence with mediators re upcoming session (.2);	0.20	\$224.00
10/6/2025	Jesse Bair	Review various correspondence with the Committee professionals, Committee, and state court counsel re the mediator's proposal and the upcoming mediation session (.2);	0.20	\$180.00
10/6/2025	Jesse Bair	Participate in conference with debtor re case insurance and mediation issues (.2);	0.20	\$180.00
10/6/2025	Jesse Bair	Participate in call with state court counsel and Committee professionals re the mediator's proposal (.2);	0.20	\$180.00
10/6/2025	Timothy Burns	Detailed preparation for upcoming mediation session, including review of various case presentations to state court counsel and the Committee and notes from previous mediation sessions (4.1);	4.10	\$4,592.00
10/6/2025	Nathan Kuenzi	Review correspondence with Committee professionals re status of mediation and upcoming sessions (.3);	0.30	\$165.00
10/6/2025	Jesse Bair	Prepare for hearing re case mediation issues (.4); participate in call with B. Wiesenbergs re same and upcoming mediation session (.2);	0.60	\$540.00
10/6/2025	Timothy Burns	Review correspondence with mediators and Committee professionals re mediation issues (.3);	0.30	\$336.00
10/6/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re outcome of hearing re insurance mediation issue (.2); review Order from Court re same (.1);	0.30	\$270.00
10/6/2025	Timothy Burns	Participate in call with Lowenstein re mediation developments (.2); participate in call with T. Gallagher re same and upcoming session (.2);	0.40	\$448.00
10/6/2025	Timothy Burns	Review correspondence with Committee professionals re hearing outcome (.2);	0.20	\$224.00
10/7/2025	Jesse Bair	Prepare for full-day mediation session (.7);	0.70	\$630.00
10/7/2025	Timothy Burns	Prepare for mediation (.8);	0.80	\$896.00

10/7/2025	Nathan Kuenzi	Analyze claim allocations by insurance carrier and draft summary re same in connection with ongoing insurance negotiations (1.3);	1.30	\$715.00
10/7/2025	Nathan Kuenzi	Review correspondence from B. Weisenberg regarding status of mediation (.2);	0.20	\$110.00
10/7/2025	Jesse Bair	Participate in portion of full-day mediation session (8.2);	8.20	\$7,380.00
10/7/2025	Nathan Kuenzi	Draft spreadsheet breaking down Chubb-related insurers' proportional shares of liability in connection with insurer negotiations (.8); review and respond to correspondence with Committee professionals re same (.2);	1.00	\$550.00
10/7/2025	Timothy Burns	Participate in full-day mediation session (8.6);	8.60	\$9,632.00
10/8/2025	Nathan Kuenzi	Review various correspondence with Committee professionals re mediation status and developments (.3);	0.30	\$165.00
10/8/2025	Jesse Bair	Participate in portion of day 2 of full-day mediation session (8.7);	8.70	\$7,830.00
10/8/2025	Timothy Burns	Participate in portion of day 2 of full-day mediation session (7.6);	7.60	\$8,512.00
10/8/2025	Jesse Bair	Prepare for day 2 of full-day mediation session (.3);	0.30	\$270.00
10/8/2025	Karen Dempksi	Draft pro hac vice applications for lift stay appeal for T. Burns, J. Bair, and E. Quick (.2); correspond with BB team and KBK re same and filing (.2);	0.40	\$136.00
10/9/2025	Timothy Burns	Prepare memo outlining potential counter proposal relating to mediation (.9);	0.90	\$1,008.00
10/9/2025	Timothy Burns	Review and revise draft correspondence to the Committee re mediation proposal (.3); review and respond to related correspondence re same (.1);	0.40	\$448.00
10/9/2025	Timothy Burns	Review and respond to various correspondence with Lowenstein, state court counsel, and the Committee re mediation meeting and proposal (.3); participate in call with B. Weisenberg re same (.2);	0.50	\$560.00
10/9/2025	Timothy Burns	Review and respond to B. Weisenberg correspondence re appeal argument (.2);	0.20	\$224.00
10/9/2025	Timothy Burns	Review correspondence between insurer and plaintiffs' JCCP liaison re case selection and intervention (.2);	0.20	\$224.00
10/9/2025	Jesse Bair	Review potential revised settlement terms (.2); review correspondence with Committee professionals re settlement proposal (.2);	0.40	\$360.00

10/9/2025	Timothy Burns	Review and respond to correspondence with state court counsel re mediation issues and proposal (.3); participate in call with state court counsel re same (.2);	0.50	\$560.00
10/10/2025	Timothy Burns	Participate in call with B. Weisenberg re upcoming state court counsel and Committee meetings re mediation proposals (.4);	0.40	\$448.00
10/10/2025	Erin Quick	Review and respond to correspondence with G. Albert re finalizing and filing lift stay appellate brief and associated exhibits (.3);	0.30	\$165.00
10/10/2025	Jesse Bair	Continue analyzing potential settlement terms and potential responses thereto (.4);	0.40	\$360.00
10/10/2025	Timothy Burns	Participate in additional call with state court counsel re mediation negotiations, strategy, and next-steps (.5);	0.50	\$560.00
10/10/2025	Jesse Bair	Participate in conference with T. Burns re next-steps in light of mediation outcome (.3);	0.30	\$270.00
10/10/2025	Nathan Kuenzi	Analyze pending issues in case with respect to mediation and issues raised by Committee in term sheet (1.8);	1.80	\$990.00
10/10/2025	Timothy Burns	Participate in call with Debtor re mediation issues and negotiations (.3);	0.30	\$336.00
10/10/2025	Jesse Bair	Review and respond to various correspondence with Committee professionals re additional revisions and finalization of the Committee's lift stay appellate response brief (.4);	0.40	\$360.00
10/10/2025	Erin Quick	Research re state court consolidated clergy actions in connection with finalizing the Committee's lift stay appellate brief (.7);	0.70	\$385.00
10/10/2025	Timothy Burns	Prepare for Committee meeting (.4);	0.40	\$448.00
10/10/2025	Erin Quick	Revise final draft of brief in opposition to appeal of lift stay order (1.4);	1.40	\$770.00
10/10/2025	Timothy Burns	Participate in conference with J. Bair re next-steps in light of mediation outcome (.3);	0.30	\$336.00
10/13/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re case developments and lift stay appellate oral argument (.2);	0.20	\$180.00
10/15/2025	Timothy Burns	Participate in call with B. Weisenberg and J. Prol re mediation issues (.2);	0.20	\$224.00
10/15/2025	Timothy Burns	Review correspondence from Diocese re mediation (.2); review and respond to correspondence with Committee professionals re same (.3);	0.50	\$560.00

10/15/2025	Jesse Bair	Review correspondence from Debtor re settlement negotiations and related correspondence with Committee professionals re potential response to same (.2);	0.20	\$180.00
10/15/2025	Timothy Burns	Participate in call with state court counsel re mediation status and strategy (.2);	0.20	\$224.00
10/16/2025	Timothy Burns	Conference with B. Weisenberg re mediation issues (.2);	0.20	\$224.00
10/16/2025	Timothy Burns	Review and revise draft Committee response to mediators' proposal (.2); review and respond to related correspondence with the Committee and state court counsel re same and ongoing mediation issues (.2);	0.40	\$448.00
10/17/2025	Jesse Bair	Review Committee letter to mediators re ongoing mediation negotiations and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
10/17/2025	Alexander Castro	Analyze appellate materials and cases and identify key documents needed for preparation for lift stay oral argument (1.4);	1.40	\$658.00
10/18/2025	Nathan Kuenzi	Analyze Pacific insurers insert for joint CMC (.3);	0.30	\$165.00
10/20/2025	Jesse Bair	Review and respond to correspondence re state court counsel insurance question (.1);	0.10	\$90.00
10/20/2025	Nathan Kuenzi	Analyze Pacific Insurers' proposed list of test cases (.4);	0.40	\$220.00
10/20/2025	Nathan Kuenzi	Review and respond to correspondence with state court counsel re coverage question (.2);	0.20	\$110.00
10/21/2025	Timothy Burns	Review Covington retention application and correspond with Lowenstein re questions in connection with same (.4);	0.40	\$448.00
10/21/2025	Jesse Bair	Initial review of the insurers' lift stay appeal reply brief (.3);	0.30	\$270.00
10/21/2025	Jesse Bair	Participate in call with insurer re ongoing negotiations (.2);	0.20	\$180.00
10/22/2025	Jesse Bair	Participate in call with the mediator re case developments and status (.1);	0.10	\$90.00
10/23/2025	Timothy Burns	Prepare for state court counsel meeting re mediation issues (.7);	0.70	\$784.00
10/23/2025	Jesse Bair	Prepare for state court counsel meeting re mediation negotiations, including review of recent correspondence from the mediators re same (.3);	0.30	\$270.00
10/23/2025	Timothy Burns	Conference with Committee professionals re ongoing mediation issues and strategy (.3);	0.30	\$336.00

10/24/2025	Jesse Bair	Analyze Trust-related insurance issues in connection with ongoing insurance negotiations and correspond with Committee professionals re same (.4);	0.40	\$360.00
10/24/2025	Nathan Kuenzi	Participate in call with state court counsel re lift stay case insurance issues (.2);	0.20	\$110.00
10/24/2025	Nathan Kuenzi	Analyze mediator's letter to the Committee (.1);	0.10	\$55.00
10/25/2025	Timothy Burns	Review correspondence with Committee professionals re potential Plan issues (.2);	0.20	\$224.00
10/26/2025	Timothy Burns	Participate in conference with J. Bair re presentation to the Committee presentation re mediation issues (.2); review draft presentation and related correspondence with Committee professionals re same (.2);	0.40	\$448.00
10/26/2025	Jesse Bair	Review and edit presentation to the Committee re Trust structure and post-confirmation insurance litigation (.7); participate in call with T. Burns re same and negotiation issues (.2);	0.90	\$810.00
10/26/2025	Jesse Bair	Review correspondence with Committee professionals, the Committee, and state court counsel re case developments and ongoing negotiations (.2); participate in call with B. Wiesenberg re same (.1);	0.30	\$270.00
10/26/2025	Timothy Burns	Review Debtor's mediation communication and related correspondence with the Committee, Committee professionals, and state court counsel re same (.2);	0.20	\$224.00
10/28/2025	Nathan Kuenzi	Analyze various mediation materials, coverage correspondence, and claim analyses, and identify key materials needed for review in preparation for motion to dismiss hearing (1.8);	1.80	\$990.00
10/28/2025	Timothy Burns	Correspondence with B. Weisenberg and J. Prol re pre-hearing meeting and hearing preparations (.2);	0.20	\$224.00
10/28/2025	Timothy Burns	Prepare for motion to dismiss hearing, including review of various briefings, mediation materials, and coverage analyses (3.2);	3.20	\$3,584.00
10/28/2025	Nathan Kuenzi	Review and respond to correspondence with T. Burns re preparations for motion to dismiss hearing (.2);	0.20	\$110.00
10/28/2025	Timothy Burns	Correspond with N. Kuenzi re upcoming motion to dismiss hearing and preparations in connection with same (.2);	0.20	\$224.00
10/28/2025	Timothy Burns	Participate in call with state court counsel re preparations and strategy for motion to dismiss hearing (.2);	0.20	\$224.00

10/29/2025	Timothy Burns	Continue preparing for motion to dismiss hearing (3.3);	3.30	\$3,696.00
10/29/2025	Jesse Bair	Participate in call with Committee professionals re preparations and strategy for motion to dismiss hearing (.3);	0.30	\$270.00
10/29/2025	Timothy Burns	Participate in pre-hearing conferences with Committee professionals and state court counsel motion to dismiss re argument and hearing preparations (1.6);	1.60	\$1,792.00
10/29/2025	Jesse Bair	Review debtor's status conference statement (.2);	0.20	\$180.00
10/29/2025	Timothy Burns	Participate in post-hearing conferences with state court counsel and Committee professionals re hearing outcome (.6);	0.60	\$672.00
10/29/2025	Nathan Kuenzi	Analyze various filings, prior Plan drafts, and hearing transcripts, and draft summary re positions taken by Debtor re bad faith claims in connection with motion to dismiss hearing and related insurance Plan issues (2.4);	2.40	\$1,320.00
10/29/2025	Jesse Bair	Participate in call with T. Burns re outcome of motion to dismiss hearing and case next-steps (.2);	0.20	\$180.00
10/29/2025	Timothy Burns	Participate in call with J. Bair re hearing outcome and next-steps (.2);	0.20	\$224.00
10/29/2025	Nathan Kuenzi	Draft summary re term sheet positions and coverage issues in preparation for motion to dismiss hearing (1.0);	1.00	\$550.00
10/30/2025	Timothy Burns	Conference with B. Weisenberg re state court counsel meeting (.2);	0.20	\$224.00
10/30/2025	Jesse Bair	Participate in call with the insurers re upcoming hearing on the insurers' lift stay appeal and potential impact of motion to dismiss ruling on same (.2);	0.20	\$180.00
10/30/2025	Timothy Burns	Conference with J. Bair re ongoing negotiations with Debtor, outcome of state court counsel meeting, and case next-steps (.2);	0.20	\$224.00
10/30/2025	Timothy Burns	Review and respond to correspondence from Diocese re ongoing settlement negotiations (.2);	0.20	\$224.00
10/30/2025	Jesse Bair	Participate in call with T. Burns re outcome of state court counsel meeting, case developments, and next-steps (.2);	0.20	\$180.00
10/31/2025	Timothy Burns	Participate in call with state court counsel re motion to dismiss hearing outcome and upcoming Committee meeting (.2); participate in call with J. Prol re same (.1);	0.30	\$336.00

10/31/2025 Jesse Bair	Review and respond to additional correspondence with the insurers and Committee professionals re lift stay oral argument, potential impact on same from motion to dismiss ruling, and potential joint submission to district court re same (.3); begin preparations for lift stay oral argument (.1);	0.40	\$360.00
10/31/2025 Timothy Burns	Prepare for Committee meeting (.3);	0.30	\$336.00
Totals for Insurance Recovery Activities		99.00	\$94,175.00

Total Hours and Fees	113.40	\$107,909.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/06/2025	Travel meal, T. Burns	\$44.94
10/06/2025	Travel meal, T. Burns	\$8.78
10/06/2025	Hotel, J. Bair (2 nights)	\$1,208.03
10/06/2025	United Airlines, T. Burns (MSN-LAX Oct. 6-9)	\$836.79
10/06/2025	Uber, T. Burns (airport to hotel)	\$111.48
10/06/2025	Travel meal, J. Bair	\$19.40
10/06/2025	Delta Airlines, J. Bair (MSN-LAX, Oct. 6-8)	\$748.37
10/06/2025	Taxi, J. Bair (airport to hotel)	\$73.50
10/06/2025	Travel meal, T. Burns	\$39.70
10/06/2025	Hotel, T. Burns (3 nights)	\$1,864.11
10/07/2025	Travel meal, T. Burns and J. Bair	\$50.00
10/08/2025	Uber, J. Bair (hotel to airport)	\$81.28
10/08/2025	Travel meal, T. Burns and J. Bair	\$50.00
10/09/2025	United Airlines Inflight Wi-Fi, T. Burns (LAX-DEN)	\$10.00
10/09/2025	Travel meal, T. Burns	\$8.37
10/09/2025	Airport parking, T. Burns	\$40.00
10/09/2025	Airport parking, J. Bair	\$30.00
10/09/2025	Uber, T. Burns (hotel to airport)	\$105.82
10/10/2025	Fee for Admission Pro Hac Vice, T. Burns	\$328.00
10/10/2025	Fee for Admission Pro Hac Vice, J. Bair	\$328.00
10/10/2025	Fee for Admission Pro Hac Vice, E. Quick	\$328.00
10/28/2025	Delta Airlines, T. Burns (MSN-MSP, Oct. 28)	\$368.48
10/28/2025	Uber, T. Burns (office to airport)	\$24.45
10/28/2025	Delta Airlines, T. Burns (MSP-SFO-MSN, Oct. 28-30)	\$1,123.16
10/28/2025	Uber, T. Burns (airport to hotel)	\$129.30
10/28/2025	Hotel, T. Burns (2 nights)	\$886.00
10/29/2025	Uber, T. Burns (hotel to courthouse)	\$109.83

10/29/2025	Travel meal, T. Burns	\$8.24
10/30/2025	Uber, T. Burns (hotel to airport)	\$124.50
10/30/2025	Travel meal, T. Burns	\$42.39
Total Expenses		\$9,130.92

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	1.40	\$470.00	\$658.00
Brenda Horn-Edwards	Paralegal	0.70	\$340.00	\$238.00
Erin Quick	Associate	3.60	\$550.00	\$1,980.00
Jesse Bair	Partner	39.30	\$900.00	\$35,370.00
Karen Dempksi	Paralegal	0.50	\$340.00	\$170.00
Nathan Kuenzi	Associate	11.50	\$550.00	\$6,325.00
Timothy Burns	Partner	56.40	\$1,120.00	\$63,168.00

Total Due This Invoice: \$117,039.92