

COVINGTON & BURLING LLP

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COVINGTON & BURLING LLP

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*Special Insurance Counsel for
 the Debtor*

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

In re:

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

Debtor.

Case No.: 23-40523 WJL

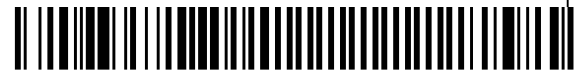
Chapter 11

**INITIAL MONTHLY FEE STATEMENT
 OF COVINGTON & BURLING LLP, AS
 SPECIAL INSURANCE COUNSEL FOR
 THE DEBTOR, FOR ALLOWANCE OF
 COMPENSATION AND
 REIMBURSEMENT OF EXPENSES FOR
 THE PERIOD OF OCTOBER 7, 2025
 THROUGH OCTOBER 31, 2025**

Judge: Hon. William J. Lafferty

**Objection Deadline: December 11, 2025
 4:00 p.m. (Pacific Time)**

[No Hearing Requested]



Name of Applicant:	Covington & Burling LLP
Authorized to Provide Professional Services to:	Debtor
Date of Retention:	Effective as of October 7, 2025 by Order entered November 12, 2025 [Dkt. No. 2450]
Period for Which Compensation and Reimbursement is Sought	October 7, 2025 – October 31, 2025
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$36,015.00
20% Holdback	\$7,203.00
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$23.20
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought	\$28,835.20

PRELIMINARY STATEMENT

On May 8, 2023, the Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor” or “RCBO”)¹ commenced the above-captioned chapter 11 bankruptcy case (the “Chapter 11 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 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

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Orders (defined below).

1 Orders” and together with the Original Compensation Procedures Order, the “Compensation Procedures
2 Orders”).

3 On October 20, 2025, the Debtor filed the *Debtor’s Application to Employ Covington & Burling*
4 *LLP as Special Insurance Counsel* [Dkt. No. 2416] (the “Retention Application”). The Court approved
5 the Retention Application on November 12, 2025, entering the *Order Approving Debtor’s Application to*
6 *Employ Covington & Burling LLP as Special Insurance Counsel* [Dkt. No. 2450] (the “Covington
7 Retention Order”).

8 Covington & Burling LLP (“Covington” or “Applicant”), as special insurance counsel to the
9 Debtor, hereby submits its initial monthly fee statement (the “Monthly Fee Statement”) for allowance of
10 payment of compensation for professional services rendered and for reimbursement of actual and
11 necessary expenses incurred for the period commencing October 7, 2025 to and including October 31,
12 2025 (the “Fee Period”) pursuant to the Compensation Procedures Orders.

13 By this Monthly Fee Statement, Covington seeks (i) a monthly interim allowance of compensation
14 in the amount of \$36,015.00 and actual and necessary expenses in the amount of \$23.20 for a total
15 allowance of \$36,038.20, and (ii) payment of \$28,812.00 (80% of the allowed fees pursuant to the
16 Compensation Procedure Orders) and reimbursement of \$23.20 (100% of the allowed expenses pursuant
17 to the Compensation Procedures Orders) for a total payment of \$28,835.20 for the Fee Period.

18 **SERVICES RENDERED AND EXPENSES INCURRED DURING THE FEE PERIOD**

19 Attached as Exhibit 1 is the name of each of Covington’s professionals and paraprofessionals who
20 performed services for the Debtor in connection with this Chapter 11 Case during the Fee Period covered
21 by this Monthly Fee Statement and the hourly rate and total fees for each professional during the Fee
22 Period.

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

24 Attached as Exhibit 3 is a summary of expenses included in this Monthly Fee Statement incurred
25 during the Fee Period.

26 Attached as Exhibit 4 are the detailed time entries of Covington’s professionals and
27 paraprofessionals during the Fee Period.
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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.

COVINGTON & BURLING, LLP

David B. Goodwin
Christine S. Haskett
Salesforce Tower, 415 Mission Street, Suite 5400
San Francisco, CA 94105

Special Insurance Counsel for the Debtor

EXHIBIT 1

**Compensation by Professional
October 7, 2025 – October 31, 2025**

Name of Professional Individual	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Christine Saunders Haskett	Partner, 1997	\$1,050.00	17.20	\$18,060.00
Abigail V. O'Brient	Partner, 2009	\$1,050.00	8.00	\$8,400.00
David Goodwin	Senior Counsel, 1982	\$1,050.00	6.40	\$6,720.00
Julia C. Philips Roth	Associate, 2019	\$1,050.00	2.70	\$2,835.00
TOTAL			34.30	\$36,015.00

EXHIBIT 2
Compensation by Category
October 7, 2025 – October 31, 2025

Category	Hours Billed this Fee Period	Total for Fee Statement
General Insurance Advice	30.70	\$32,235.00
Fee and Employment Applications	3.60	\$3,780.00
TOTAL	34.30	\$36,015.00

EXHIBIT 3
Expense by Category
October 7, 2025 – October 31, 2025

Costs/Expense	Amount Billed
Electronic Legal Research Services	\$23.20
TOTAL	\$23.20

EXHIBIT 4
Time Entries
October 7, 2025 – October 31, 2025

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Covington & Burling LLP
Salesforce Tower
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Matthew Kemner
General Counsel, Roman Catholic
Diocese of Oakland
Roman Catholic Diocese of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

November 19, 2025

Invoice No.: 61161090
Account: 048691.00001

Roman Catholic Bishop of Oakland

Re: General Insurance Advice

For professional services rendered in connection with the above referenced matter through
October 31, 2025:

Fees:	\$	32,235.00
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Disbursements:

Westlaw Research	\$	23.20
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Disbursements	\$	23.20
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Total Fees and Disbursements:	\$	32,258.20
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TOTAL AMOUNT DUE:	\$	32,258.20
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Time Detail

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L100 - CASE ASSESSMENT, DEVELOPMT., ADM				
10/07/25	David Goodwin	Conference call with the mediation team.	0.20	\$210.00
10/08/25	David Goodwin	Conference call with the mediation team (.10); telephone conference with Mr. Burns (.20).	0.30	\$315.00
Subtotal:	L100 - CASE ASSESSMENT, DEVELOPMT., ADM		0.50	\$525.00
L120 - Analysis/Strategy				
10/23/25	Christine Saunders Haskett	Telephone conference with client and bankruptcy counsel re insurance strategy and prior correspondence with insurer (.60); emails regarding insurance coverage issues (.50).	1.10	\$1,155.00
10/23/25	David Goodwin	Emails regarding insurance strategy issues (.10); telephone call with Mr. Kemner regarding settlement issues (.10); follow on from the call with Mr. Kemner (.10).	0.30	\$315.00
10/24/25	Christine Saunders Haskett	Review and analyze draft letter to insurer.	0.80	\$840.00
10/24/25	David Goodwin	Emails regarding defense counsel issues (.10); revise draft letter to Travelers (1.10).	1.20	\$1,260.00
10/25/25	Christine Saunders Haskett	Review and revise draft letter to insurer (0.3); review and respond to emails re same (0.3).	0.60	\$630.00
10/26/25	Christine Saunders Haskett	Review and revise draft letter to insurer (0.85) and review and respond to emails re same (0.85).	1.70	\$1,785.00
10/26/25	David Goodwin	Revise draft letter to Travelers.	0.20	\$210.00
10/27/25	Christine Saunders Haskett	Telephone conference and email with client and bankruptcy counsel re strategy issues in connection with correspondence with insurers and independent counsel issues (.70); draft letters to insurers re settlement obligations and bad faith (3.70).	4.40	\$4,620.00
10/27/25	David Goodwin	Conference call with Mr. Kemner and the Foley team regarding insurance issues (.70); analyze insurance issues (.20); revise draft "insurance bad faith" letter (.10).	1.00	\$1,050.00
10/28/25	Christine Saunders	Email with insurer counsel re settlement and defense issues (.30); telephone with team and	2.40	\$2,520.00

Roman Catholic Bishop of Oakland

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General Insurance Advice

048691.00001

Invoice No.: 61161090

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
	Haskett	client re strategy in connection with same (1.10); emails re same (.30).		
10/28/25	David Goodwin	Emails with regards to duty to defend issues.	0.10	\$105.00
10/29/25	Christine Saunders Haskett	Telephone and email with client and team re insurance strategy issues (.60); review and analyze court filing re same (1.10).	1.70	\$1,785.00
10/29/25	Abigail V. O'Brient	Confer regarding insurance strategy (.5); monitor hearing on dismissal with respect to insurance-related matters (2.4); email update to insurance team re same (.3).	3.20	\$3,360.00
10/29/25	David Goodwin	Analyze coverage and litigation issues.	0.70	\$735.00
10/30/25	Christine Saunders Haskett	Review and analyze insurance documents provided by bankruptcy counsel.	0.60	\$630.00
10/30/25	Christine Saunders Haskett	Review and analyze settlement and insurance strategy issues (2.0); telephone conferences and email with client, team, and bankruptcy counsel re same (.50).	2.50	\$2,625.00
10/30/25	Abigail V. O'Brient	Emails with D. Goodwin and C. Haskett re insurance issues.	0.20	\$210.00
10/30/25	David Goodwin	Conference call with Mr. Kemner regarding settlement issues (.50); analyze issues discussed during the call (.20); emails re same (.10).	0.80	\$840.00
10/31/25	Christine Saunders Haskett	Telephone conference and email with team, client, and bankruptcy counsel re settlement strategy and considerations and communications with mediator.	1.40	\$1,470.00
10/31/25	Abigail V. O'Brient	Call with client re insurance assignment (.5); follow up communications re same (.8); confer with J. Philips Roth re preparation of memorandum on issues related to insurance assignment (.5).	1.80	\$1,890.00
10/31/25	David Goodwin	Comment on draft email to the mediator (.10) ; conference call regarding settlement issues (.50); follow on from conference call to analyze settlement issues (.20).	0.80	\$840.00
10/31/25	Julia C. Philips Roth	Draft memorandum regarding insurance assignment.	2.10	\$2,205.00
10/31/25	Julia C. Philips Roth	Call with A. O'Brient re insurance assignment research and memorandum.	0.60	\$630.00
Subtotal:	L120 - Analysis/Strategy		30.20	\$31,710.00

Roman Catholic Bishop of Oakland

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General Insurance Advice

048691.00001

Invoice No.: 61161090

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
Total			30.70	\$32,235.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>		<u>Amount</u>
Haskett, Christine Saunders	Partner	17.20	1,050.00	\$	18,060.00
O'Brient, Abigail V.	Partner	5.20	1,050.00	\$	5,460.00
Goodwin, David	Senior Counsel	5.60	1,050.00	\$	5,880.00
Philips Roth, Julia C.	Associate	2.70	1,050.00	\$	2,835.00
Totals		30.70		\$	32,235.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Amount</u>
L120	Analysis/Strategy	\$31,710.00
L100	CASE ASSESSMENT, DEVELOPMT., ADM	\$525.00

Disbursement Summary

<u>Description</u>	<u>Amount</u>
Westlaw Research	\$ 23.20
Totals	\$ 23.20

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

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Roman Catholic Bishop of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

November 19, 2025

Invoice No.: 61161171
Account: 048691.00002

Roman Catholic Bishop of Oakland

Re: Fee and Employment Applications

For professional services rendered in connection with the above referenced matter through
October 31, 2025:

Fees: \$ 3,780.00

TOTAL AMOUNT DUE: \$ 3,780.00

Time Detail

Date	Timekeeper	Description	Hours	Amount
L250 - Other Written Motions & Submissions				
10/08/25	Abigail V. O'Brient	Emails internally and with Foley re employment of Covington as special insurance counsel.	0.50	\$525.00
10/14/25	Abigail V. O'Brient	Further revise conflicts disclosure for employment application.	0.20	\$210.00
10/16/25	Abigail V. O'Brient	Revise employment application (1.1); revise supporting declaration (0.7).	1.80	\$1,890.00
10/16/25	David Goodwin	Draft application to serve as coverage counsel (.20); communications with Mr. Kemner regarding application (.10).	0.30	\$315.00
10/17/25	David Goodwin	Revise draft fee application.	0.40	\$420.00
10/29/25	David Goodwin	Emails regarding bankruptcy filings regarding appointment as counsel.	0.10	\$105.00
Subtotal:	L250 - Other Written Motions & Submissions		3.30	\$3,465.00
L430 - Written Motions and Submissions				
10/17/25	Abigail V. O'Brient	Review and comment on revised draft of Covington employment application from Foley and supporting declarations.	0.30	\$315.00
Subtotal:	L430 - Written Motions and Submissions		0.30	\$315.00
Total			3.60	\$3,780.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>		<u>Amount</u>
O'Brient, Abigail V.	Partner	2.80	1,050.00	\$	2,940.00
Goodwin, David	Senior Counsel	0.80	1,050.00	\$	840.00
Totals		3.60		\$	3,780.00

Task Summary

<u>Task Code</u>	<u>Description</u>	<u>Amount</u>
L250	Other Written Motions & Submissions	\$3,465.00
L430	Written Motions and Submissions	\$315.00