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Special Insurance Counsel for the Debtor

UNITED STATES BANKRUPTCY 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

ELEVENTH 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 AUGUST 1, 2026 THROUGH AUGUST 31, 2026

Judge: Hon. William J. Lafferty

Objection Deadline: October 9, 2026 4:00 p.m. (Pacific Time)

[No Hearing Requested]

Case: 23-40523 Doc# 3528 Filed: 09/29/26 Entered: 09/
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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	August 1, 2026 – August 31, 2026
Amount of Compensation Sought as Actual, Reasonable and Necessary:	$75,874.00
20% Holdback	$15,174.80
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	$301.16
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought	$61,000.36

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).

Orders" and together with the Original Compensation Procedures Order, the "Compensation Procedures Orders").

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

Covington & Burling LLP ("Covington" or "Applicant"), as special insurance counsel to the Debtor, hereby submits its eleventh 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 August 1, 2026 to and including August 31, 2026 (the "Fee Period") pursuant to the Compensation Procedures Orders.

By this Monthly Fee Statement, Covington seeks (i) a monthly interim allowance of compensation in the amount of $75,874.00 and actual and necessary expenses in the amount of $301.16 for a total allowance of $76,175.16, and (ii) payment of $60,699.20 (80% of the allowed fees pursuant to the Compensation Procedure Orders) and reimbursement of $301.16 (100% of the allowed expenses pursuant to the Compensation Procedures Orders) for a total payment of $61,000.36 for the Fee Period.

SERVICES RENDERED AND EXPENSES INCURRED DURING THE FEE PERIOD

Attached as **Exhibit 1** is the name of each of Covington'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 **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 of Covington'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 (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 Covington 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: September 29, 2026

COVINGTON & BURLING, LLP

By: */s/ Abigail V. O'Brient*
Abigail V. O'Brient
1999 Avenue of the Stars, Suite 3500
Los Angeles, CA 90067

David B. Goodwin
Christine S. Haskett
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San Francisco, CA 94105

Special Insurance Counsel for the Debtor

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EXHIBIT 1

Compensation by Professional
August 1, 2026 – August 31, 2026

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	$1,180.00	14.10	$16,638.00
Abigail V. O'Brient	Partner, 2009	$1,180.00	1.40	$1,652.00
David Goodwin	Senior Counsel, 1982	$1,180.00	26.70	$31,506.00
Julia C. Philips Roth	Associate, 2019	$1,180.00	1.50	$1,770.00
Sean M. Bender	Associate, 2021	$1,180.00	6.20	$7,316.00
Harper A. Johnson	Associate, 2025	$1,180.00	14.40	$16,992.00
TOTAL			**64.30**	**$75,874.00**

EXHIBIT 2

Compensation by Category
August 1, 2026 – August 31, 2026

Category	Hours Billed this Fee Period	Total for Fee Statement
General Insurance Advice	62.40	$73,632.00
Fee and Employment Applications	1.90	$2,242.00
TOTAL	**64.30**	**$75,874.00**

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EXHIBIT 3

Expense by Category
August 1, 2026 – August 31, 2026

Costs/Expense	Amount Billed
Monthly Disk Storage	$36.50
Electronic Legal Research Services	$264.66
TOTAL	**$301.16**

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EXHIBIT 4

Time Entries

August 1, 2026 – August 31, 2026

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COVINGTON

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

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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

September 22, 2026

Invoice No.: 61204319
Account: 048691.00001

Roman Catholic Bishop of Oakland

Re: General Insurance Advice

For professional services rendered in connection with the above referenced matter through August 31, 2026:

Fees:	**$**	**73,632.00**
Disbursements:		
Computer Research	$	31.30
Westlaw Research	$	233.36
Monthly Disk Storage	$	36.50
Disbursements	**$**	**301.16**
Total Fees and Disbursements:	**$**	**73,933.16**
TOTAL AMOUNT DUE:	**$**	**73,933.16**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L120 - Analysis/Strategy				
08/05/26	Christine Saunders Haskett	Telephone with co-counsel re strategy in connection with insurers' defense agreement proposal (0.3); email with team re strategy issues in connection with same (0.4).	0.70	$826.00
08/05/26	David Goodwin	Emails regarding insurance issues in settlement of underlying claims (.10); emails regarding issues arising in connection with the duty to defend (.10).	0.20	$236.00
08/06/26	Christine Saunders Haskett	Email with team re strategy issues in connection with settlement discussions between insurers and plaintiff in underlying matter.	0.40	$472.00
08/06/26	David Goodwin	Analyze issues regarding the number of occurrences.	0.30	$354.00
08/07/26	Christine Saunders Haskett	Review and analyze implications of insurer mediation discussions with plaintiff.	0.10	$118.00
08/07/26	David Goodwin	Emails regarding Woodall settlement issues.	0.10	$118.00
08/10/26	David Goodwin	Analyze insurers' bankruptcy briefs (.40); outline arguments for bankruptcy reply brief (1.50).	1.90	$2,242.00
08/11/26	Christine Saunders Haskett	Review and analyze insurer post-trial briefs from bankruptcy proceeding (0.8); draft list of reply points and points for coverage litigation based on same (1.0); email with team re same (0.4).	2.20	$2,596.00
08/11/26	David Goodwin	Draft memorandum for Mr. Kemner regarding responses to certain arguments in insurers' trial briefs.	0.60	$708.00
08/12/26	Christine Saunders Haskett	Review and analyze proposed defense agreement from insurer and email re same.	0.20	$236.00
08/12/26	David Goodwin	Emails regarding bad faith claims against Chubb.	0.20	$236.00
08/13/26	Christine Saunders Haskett	Review and respond to emails re strategy for responding to insurer arguments re control of defense and settlement of underlying cases.	0.50	$590.00
08/13/26	David Goodwin	Respond to questions from Mr. Kemner regarding insurance settlement issues.	0.10	$118.00
08/14/26	Christine Saunders	Telephone conference with insurer counsel re proposed defense agreement (0.4); telephone	0.80	$944.00

Date	Timekeeper	Description	Hours	Amount
	Haskett	with co-counsel re same (0.1); email with client re strategy issues in light of same (0.3).		
08/14/26	David Goodwin	Emails regarding proposed defense funding agreement.	0.10	$118.00
08/17/26	David Goodwin	Emails regarding insurers' bankruptcy briefs.	0.10	$118.00
08/18/26	Christine Saunders Haskett	Review and comment on insurance issues in draft reply brief in bankruptcy proceeding (0.6); telephone conference with client and co-counsel re insurers' proposed defense agreement (0.5); email with team re same (0.3); telephone with client re same (0.2).	1.60	$1,888.00
08/18/26	David Goodwin	Revise draft brief in reply to the Unsecured Creditors Committee's brief (1.60); conference call with Mr. Kemner and Ms. Ridley regarding insurers' defense proposal (.50).	2.10	$2,478.00
08/19/26	Christine Saunders Haskett	Review and comment on draft reply to insurers' briefs in bankruptcy case.	0.60	$708.00
08/19/26	David Goodwin	Revise draft brief in response to insurers' objections to bankruptcy plan.	1.60	$1,888.00
08/20/26	Christine Saunders Haskett	Telephone conference with insurer counsel re defense agreement proposal (0.3); email with team re same (0.1).	0.40	$472.00
08/20/26	David Goodwin	Analyze insurers' bankruptcy court reply briefs (.70); emails regarding insurer defense proposal (.10) .	0.80	$944.00
08/21/26	David Goodwin	Emails regarding excess insurers' supplemental brief.	0.10	$118.00
08/27/26	David Goodwin	Emails regarding insurance issues in bankruptcy court.	0.30	$354.00
08/31/26	Abigail V. O'Brient	Review bankruptcy filings and respond to email from D. Goodwin re insurer access to proofs of claim filed by sexual abuse claimants.	0.30	$354.00
08/31/26	Julia C. Philips Roth	Analyze bar date order confidentiality protocols with respect to insurers (0.5). Communicate with D. Goodwin re same (0.2).	0.70	$826.00
Subtotal:	**L120 - Analysis/Strategy**		**17.00**	**$20,060.00**
L250 - Other Written Motions & Submissions				
08/02/26	Christine Saunders Haskett	Prepare for hearing on motions to dismiss and strike.	1.10	$1,298.00

Date	Timekeeper	Description	Hours	Amount
08/03/26	Christine Saunders Haskett	Prepare for hearing on motions to dismiss and strike (3.0); review and respond to emails re insurer request for supplemental briefing (0.2).	3.20	$3,776.00
08/03/26	David Goodwin	Draft outline of responses to insurer reply briefs for motion to dismiss hearing.	0.40	$472.00
08/03/26	Sean M. Bender	Correspond with H. Johnson re insurer reply briefs.	0.20	$236.00
08/03/26	Sean M. Bender	Finish review of insurer reply briefs (1.0), draft notes for oral argument (1.1), and correspond with C. Haskett re same (0.4).	2.50	$2,950.00
08/03/26	Harper A. Johnson	Prepare materials for upcoming argument on the insurers' motions to dismiss, to strike, and for a more definite statement.	1.50	$1,770.00
08/04/26	Christine Saunders Haskett	Email with team and co-counsel re insurer request for supplemental briefing on motions to dismiss (0.6); telephone conference with insurer counsel re same (0.3); review and revise draft stipulation re same (0.2); telephone and email with insurer counsel re stipulation and postponement of hearing (0.3).	1.40	$1,652.00
08/04/26	David Goodwin	Analyze issues raised in insurers’ proposal to continue hearing (.30); emails regarding insurers’ proposal (.10) .	0.40	$472.00
08/04/26	Sean M. Bender	Review draft continuance stipulation (0.1); correspond with C. Haskett re same (0.1).	0.20	$236.00
08/04/26	Sean M. Bender	Meet and confer call with insurers to discuss delay to oral argument.	0.30	$354.00
08/04/26	Sean M. Bender	Review draft insurer motion to delay hearing (0.3) and correspond with C. Haskett and D. Goodwin re same (0.2).	0.50	$590.00
08/10/26	David Goodwin	Outline argument for hearing on motions to dismiss.	0.40	$472.00
08/22/26	Harper A. Johnson	Review supplemental Fox Paine briefing submitted by Insurers regarding application of the Supreme Court's decision to their motions to dismiss.	0.20	$236.00
08/23/26	Christine Saunders Haskett	Review and analyze insurers' supplemental brief on motions to dismiss.	0.40	$472.00
08/24/26	Christine Saunders Haskett	Telephone conference with team re response to insurers' supplemental brief on motions to dismiss.	0.50	$590.00

Date	Timekeeper	Description	Hours	Amount
08/24/26	David Goodwin	Attend meeting regarding response to insurers' supplemental brief (.50); draft response to supplemental brief (6.40).	6.90	$8,142.00
08/24/26	Sean M. Bender	Review insurer brief on Fox Paine.	0.70	$826.00
08/24/26	Sean M. Bender	Call with C. Haskett et al to discuss response to insurer brief.	1.10	$1,298.00
08/24/26	Harper A. Johnson	Confer with case team regarding response to Insurers' supplemental motion to dismiss briefing on Fox Paine.	0.50	$590.00
08/25/26	Harper A. Johnson	Prepare supplemental briefing on California Supreme Court's Fox Paine decision for insurers' motions to dismiss, including conferring with D. Goodwin regarding such.	0.90	$1,062.00
08/26/26	David Goodwin	Conference regarding supplemental brief in opposition to motion to dismiss (.50); outline supplemental brief (.70); comment on duty to defend issues in bankruptcy brief (.10).	1.30	$1,534.00
08/26/26	Harper A. Johnson	Prepare supplemental pleading on California Supreme Court Fox Paine decision for Insurers' motion to dismiss.	3.40	$4,012.00
08/27/26	Harper A. Johnson	Prepare supplemental brief on California Supreme Court's Fox Paine decision for Insurers' motions to dismiss.	1.70	$2,006.00
08/28/26	David Goodwin	Draft supplemental brief in opposition to motion to dismiss.	2.20	$2,596.00
08/28/26	Sean M. Bender	Review draft of supplemental brief.	0.70	$826.00
08/28/26	Harper A. Johnson	Prepare supplemental brief on California Supreme Court's ruling on Fox Paine for Insurers' motions to dismiss.	2.50	$2,950.00
08/31/26	David Goodwin	Draft supplemental brief in response to excess insurers' supplemental briefing.	6.60	$7,788.00
08/31/26	Harper A. Johnson	Prepare supplemental briefing on California Supreme Court Fox Paine decision.	3.70	$4,366.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**45.40**	**$53,572.00**
Total			**62.40**	**$73,632.00**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
Haskett, Christine Saunders	Partner	14.10	1,180.00	$	16,638.00
O'Brient, Abigail V.	Partner	0.30	1,180.00	$	354.00
Goodwin, David	Senior Counsel	26.70	1,180.00	$	31,506.00
Bender, Sean M.	Associate	6.20	1,180.00	$	7,316.00
Johnson, Harper A.	Associate	14.40	1,180.00	$	16,992.00
Philips Roth, Julia C.	Associate	0.70	1,180.00	$	826.00
Totals		**62.40**		$	**73,632.00**

Task Summary

Task Code	Description	Amount
L120	Analysis/Strategy	$20,060.00
L250	Other Written Motions & Submissions	$53,572.00

Disbursement Summary

Description		Amount
Monthly Disk Storage	$	36.50
Westlaw Research	$	233.36
Computer Research	$	31.30
Totals	$	**301.16**

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
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Roman Catholic Bishop of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

September 22, 2026

Invoice No.: 61204317
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 August 31, 2026:

Fees:	**$**	**2,242.00**
TOTAL AMOUNT DUE:	**$**	**2,242.00**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L120 - Analysis/Strategy				
08/06/26	Abigail V. O'Brient	Correspondence with fee examiner re Covington's second interim application.	0.10	$118.00
Subtotal:	**L120 - Analysis/Strategy**		**0.10**	**$118.00**
L250 - Other Written Motions & Submissions				
08/06/26	Julia C. Philips Roth	Draft response to fee examiner questions	0.40	$472.00
08/30/26	Julia C. Philips Roth	Revise and finalize July monthly fee statement	0.40	$472.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**0.80**	**$944.00**
L450 - Trial and Hearing Attendance				
08/19/26	Abigail V. O'Brient	Brief review of second interim fee application of Covington in preparation for hearing on fee applications (.2); attend hearing on fee application (.8).	1.00	$1,180.00
Subtotal:	**L450 - Trial and Hearing Attendance**		**1.00**	**$1,180.00**
Total			**1.90**	**$2,242.00**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
O'Brient, Abigail V.	Partner	1.10	1,180.00	$	1,298.00
Philips Roth, Julia C.	Associate	0.80	1,180.00	$	944.00
Totals		**1.90**		$	**2,242.00**

Task Summary

Task Code	Description	Amount
L450	Trial and Hearing Attendance	$1,180.00
L120	Analysis/Strategy	$118.00
L250	Other Written Motions & Submissions	$944.00