David B. Goodwin (CA Bar No. 104469)
Christine S. Haskett (CA Bar No. 188053)
COVINGTON & BURLING LLP
Tel: (415) 591-7074; dgoodwin@cov.com
Tel: (415) 591-7087; chaskett@cov.com
Salesforce Tower, 415 Mission Street, Suite 5400
San Francisco, CA 94105

Abigail V. O'Brient (CA Bar No. 265704)
COVINGTON & BURLING LLP
Tel: (424) 323-4826; aobrient@cov.com
1999 Avenue of the Stars, Suite 3500
Los Angeles, CA 90067

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

COVER SHEET TO THIRD INTERIM FEE APPLICATION OF COVINGTON & BURLING LLP, AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF MAY 1, 2026 THROUGH AUGUST 31, 2026

Judge: Hon. William J. Lafferty

Date: December 2, 2026
Time: 10:30 a.m.
Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

Objection Deadline: November 20, 2026

Case: 23-40523 Doc# 3581 Filed: 10/30/26 Entered: 10/
2340523261030000000000005

Name of Applicant:	Covington & Burling LLP
Name of Client:	The Roman Catholic Bishop of Oakland
Time Period covered by this Application:	May 1, 2026 – August 31, 2026
Total compensation sought this period:	$407,922.25
Total expenses sought this period:	$1,440.11
Petition date:	May 8, 2023
Retention date:	Effective as of October 7, 2025
Date of order approving employment:	November 12, 2025 [Dkt. No. 2450]
Total fees approved by interim order to date:	$600,134.00
Total expenses approved by interim order to date:	$2,823.32
Total allowed fees paid to date:	$527,513.20
Total allowed expenses paid to date:	$2,823.32
Blended rate in this application for all attorneys:	$1,180.00
Blended rate in this application for all timekeepers:	$1,154.28
Fees sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	$326,337.80
Expenses sought in this application and already paid pursuant to a monthly compensation order but not yet allowed:	$1,440.11
Number of professionals included in this application:	10
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals billing fewer than 15 hours:	6
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation rate sought in this application using the rates originally disclosed in the retention application:	No
Interim or Final:	Interim

SUMMARY OF MONTHLY FEE STATEMENTS FOR THE INTERIM FEE PERIOD

Date Filed	Period Covered	80% of Fees Requested	Total Fees Incurred	Expenses Requested	Fees Approved	Expenses Approved	Amount Received
06/29/2026 (Dkt. No. 3308)	05/01/2026 – 05/31/2026	$107,580.60	$134,475.75	$164.75	$107,580.60	$164.75	$107,745.35
07/29/2026 (Dkt. No. 3379)	06/01/2026 – 06/30/2026	$59,033.60	$73,792.00	$877.68	$59,033.60	$877.68	$59,911.28
08/31/2026 (Dkt. No. 3472)	07/01/2026 – 07/31/2026	$99,024.40	$123,780.50	$96.52	$99,024.40	$96.52	$99,120.92
09/29/2026 (Dkt. No. 3528)	08/01/2026 – 08/31/2026	$60,699.20	$75,874.00	$301.16	$60,699.20	$301.16	$61,000.36
Total		**$326,337.80**	**$407,922.25**	**$1,440.11**	**$326,337.80**	**$1,440.11**	**$327,777.91**

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Application and Not Yet Paid: $81,584.45

DATED: October 30, 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
Salesforce Tower, 415 Mission Street, Suite 5400
San Francisco, CA 94105

Special Insurance Counsel for the Debtor

David B. Goodwin (CA Bar No. 104469)
Christine S. Haskett (CA Bar No. 188053)
COVINGTON & BURLING LLP
Tel: (415) 591-7074; dgoodwin@cov.com
Tel: (415) 591-7087; chaskett@cov.com
Salesforce Tower, 415 Mission Street, Suite 5400
San Francisco, CA 94105

Abigail V. O'Brient (CA Bar No. 265704)
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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

THIRD INTERIM FEE APPLICATION OF COVINGTON & BURLING LLP, AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF MAY 1, 2026 THROUGH AUGUST 31, 2026

Judge: Hon. William J. Lafferty

Date: December 2, 2026
Time: 10:30 a.m.
Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

Objection Deadline: November 20, 2026

I. INTRODUCTION

Covington & Burling LLP ("Covington" or the "Firm"), as special insurance counsel to The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO"), respectfully submits this third interim application for allowance of compensation and reimbursement of actual and necessary expenses (the "Interim Application") for services performed as special insurance counsel to the Debtor for the period of May 1, 2026 through August 31, 2026 (the "Interim Fee Period").

Covington seeks interim approval of its fees incurred and reimbursement of expenses during the Interim Fee Period totaling **$409,362.36**, which sum represents compensation for legal services rendered in the amount of **$407,922.25** and reimbursement for expenses incurred in the amount of **$1,440.11**. Covington spent a total of 353.40 hours and incurred a total of $407,922.25 in fees associated with the services provided to the Debtor in this matter, of which Covington requests a total of $81,584.45 be paid to Covington.

This Interim Application is based upon the contents hereof, together with the exhibits, the declaration of Abigail V. O'Brient filed concurrently herewith, the pleadings, papers, and records on file in this case, and any evidence that the Court may entertain at the time of the hearing on the Interim Application. This Interim Application is subject to the United States Department of Justice's *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the "Large Case Guidelines"). Summary charts complying with the Large Case Guidelines and detailing the amounts of fees charged and hours worked by each of Covington's professionals and paraprofessionals during the Interim Fee Period are attached hereto as **Exhibit B** through **Exhibit F**.

II. GENERAL BACKGROUND

On May 8, 2023 (the "Petition Date"), the Debtor 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 Orders" and together with the Original Compensation Procedures Order, the "Compensation Procedures Orders").[1]

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"). A copy of the Covington Retention Order is attached hereto as **Exhibit A**.

On January 13, 2026, the Debtor filed the *Debtor's Motion to Amend Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 2560] (the "Second Amended Compensation Procedures Motion"). On February 12, 2026, the Court entered an order denying the Second Amended Compensation Procedures Motion without prejudice. Dkt. No. 2632.

On October 15, 2026, the Court entered the *Order Approving Stipulation to Extend Time for Professionals to File Interim Fee Applications* [Dkt. 3564], extending the deadline for this Interim Application to October 30, 2026.

III. SERVICES RENDERED

In accordance with the *United States Bankruptcy Court for the Northern District of California Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees* (the "Northern District Guidelines") and the Local Bankruptcy Rules for the Northern District of California (the "Local

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

Rules"), Covington has attempted to place the services performed in the category that best relates to the service provided. However, because certain services affected multiple categories, services pertaining to one category may occasionally be included in another category. The fact that similar services appear in several categories did not result in any duplication of work or billing.

Covington has established the following billing categories in this case to date:

001 – General Insurance Advice
002 – Fee and Employment Applications

Covington's invoices for the Interim Fee Period, which include a detailed breakdown of the time entries and expenses incurred, are attached hereto as **Exhibit G**.

A. General Insurance Advice (001)

Total Hours 344.60/Total Fees $397,538.25

During the Interim Fee Period, Covington analyzed insurance policies and coverage issues; conducted research, drafted memoranda, contributed to strategy proposals, and communicated extensively with parties in interest, including the insurers, regarding insurance assignment, policy limits, missing policies, settlement structure, and insurer obligation issues; and prepared for and participated in mediation discussions, other settlement negotiations, hearings, and status conferences. Among other things, Covington revised and filed the Sixth Amended Complaint against the insurers; prepared the Debtor's responses to insurer discovery requests and pursued deficiencies in the insurers' discovery responses through deficiency letters and meet-and-confer conferences; analyzed and drafted oppositions to the insurers' motions to dismiss, strike, and for a more definite statement; argued those motions before the district court; prepared for court-ordered case management and discovery conferences; negotiated stipulations in connection with potential settlements; advised the client on strategy issues; and analyzed insurance issues raised in connection with plan confirmation.

B. Fee and Employment Applications (002)

Total Hours 8.80/Total Fees $10,384.00

During the Interim Fee Period, Covington prepared the second interim fee application detailing the services Covington rendered to the Debtor between January 1, 2026 and April 30, 2026 (the "Second

Interim Application"), and attended the hearing thereon. In response to the Fee Examiner's interim report, in which the Fee Examiner raised issues with Covington's Second Interim Application related to vague time entries and miscellaneous costs, Covington worked with the Fee Examiner to resolve all issues identified in the report. Covington also prepared the seventh monthly fee statement, a certificate of non-objection to the seventh monthly fee statement, the eighth monthly fee statement, a certificate of non-objection to the eighth monthly fee statement, the ninth monthly fee statement, a certificate of non-objection to the ninth monthly fee statement, and the tenth monthly fee statement during the Interim Fee Period. Docket Nos. 3030, 3221, 3308, 3357, 3379, 3436, 3472.

IV. REIMBURSEMENT OF EXPENSES

A. List of Expenses by Category

Covington advanced costs during the Interim Fee Period, including certain in-house charges in connection with the performance of the services described in this Interim Application. During the Interim Fee Period, Covington incurred and billed the Debtor a total of $1,440.11 in expenses. As this modest amount reflects, Covington made every effort to keep the costs in this case to a minimum. A summary chart detailing the type and amount of expenses incurred during the Interim Fee period is attached hereto as **Exhibit E**.

Covington does not charge for photocopying expenses, print jobs, or scanned copies. However, it might sometimes be necessary for Covington to send large copying projects to an outside copy service that charges a reduced rate for photocopying.

Regarding providers of on-line legal research, Covington charges the standard usage rates these providers charge for computerized legal research. O'Brient Decl. ¶ 6. Covington bills its clients the actual amount charged by such services, with no premium. Id. Any volume discount received by Covington is passed on to the client. *Id.* Covington does not charge for local or long-distance calls placed by attorneys from their offices. *Id.* ¶ 7. Covington only bills its clients for the actual costs charged to Covington by teleconferencing services in the event that a multiple-party teleconference is initiated through Covington. *Id.*

V. COMPLIANCE WITH GUIDELINES

A. Hourly Rates

The hourly rates of all professionals and paraprofessionals rendering services in this case are set forth on the Billing Summary Chart on **Exhibit C** annexed hereto. As noted in Covington's retention application and other documents, Covington's rates increase annually on January 1 of each year; provided, however, that Covington has agreed to an alternative fee arrangement with the Debtor as set forth below.

B. Client Review of Billing Statements

Pursuant to the Northern District Guidelines, an email enclosing this Interim Application is being sent to the Debtor concurrently with its filing. This email will include the language required by the Guidelines, inviting the Debtor to discuss with the Firm and/or the United States Trustee any objections, concerns, or questions the Debtor may have with regard to the requested compensation and reimbursement set forth in the Interim Application.

C. Notice of Application and Hearing

Notice of the submission of this Interim Application and the hearing thereon will be provided to the United States Trustee, the Debtor, the Official Committee of Unsecured Creditors, all parties requesting special notice and other interested parties in accordance with the Bankruptcy Rules, Local Bankruptcy Rules, and any applicable orders of the Court. Complete copies of the Interim Application will be promptly furnished to any other party upon specific request. Therefore, notice should be deemed adequate under the circumstances and in accordance with Federal Rules 2002(a)(6) and 2002(c)(2). Additionally, this Interim Application is available from the claims and noticing agent, KCC (d/b/a Verita Global), at no charge.

D. No Agreement to Share Compensation

Neither Covington, nor any partners or associates of the Firm, have any agreement or any understanding of any kind or nature to divide, pay over, or share any portion of the fees to be awarded to Covington with any other person or attorney, except among members of the Firm. O'Brient Decl. ¶ 10.

E. Other Compliance with Large Case Requirements

Attached as **Exhibit B** through **Exhibit F** are the exhibits required by the Large Case Guidelines. In addition, pursuant to paragraph C.5 of the Large Case Guidelines, Covington provides the following statements:

INQUIRY	STATEMENTS
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	Yes – rather than charge its standard rates, Covington agreed to provide services to the Debtor at an all-attorney blended rate of $1,050 per hour for the first three months of the engagement. Thereafter, at the Debtor's option, Covington rendered services to the Debtor at an all-attorney blended rate of $1,180 per hour, with non-attorney staff billed at a 10% discount from standard rates.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of this bankruptcy case?	No
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.	No
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	No
If the fee application includes any rate increases since retention: i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?	Yes – rather than charge its standard rates, Covington agreed to provide services to the Debtor at an all-attorney blended rate of $1,050 per hour for the first three months of the engagement. Thereafter, at the Debtor's option, Covington rendered services to the Debtor at an all-attorney blended rate of $1,180 per hour, with non-attorney staff billed at a 10% discount from standard rates.

VI. BASIS FOR ALLOWANCE OF FEES AND EXPENSES

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Pursuant to section 330 of the Bankruptcy Code, the Court may award to a professional person reasonable compensation for actual, necessary services rendered, and reimbursement for actual, necessary expenses incurred. Pursuant to section 331 of the Bankruptcy Code, the Court may award interim compensation and reimbursement to a professional.

In determining the amount of allowable fees under section 330(a) of the Bankruptcy Code, courts are to be guided by the same "general principles" as are to be applied in determining awards under the federal fee-shifting statutes, with "some accommodation to the peculiarities of bankruptcy matters." *Burgess v. Klenske* (*In re Manoa Finance Co., Inc.*), 853 F. 2d 687, 691 (9th Cir. 1988).

In assessing the propriety of an award of attorneys' fees, twelve factors relevant to determining such fees were identified in *Johnson v. Georgia Highway Express, Inc.*, 488 F. 2d 714, 717-719 (5th Cir. 1974), a Title VII class action case under the Civil Rights Act of 1964, 42 U. S. C. § 2000 et seq., and *Kerr v. Screen Extras Guild, Inc.*, 526 F. 2d 67, 70 (9th Cir. 1975), *cert. denied*, 425 U. S. 951 (1976): (1) the time and labor required, (2) the novelty and difficulty of the questions, (3) the skill requisite to perform the service properly, (4) the preclusion of other employment by the professional due to acceptance of the case, (5) the customary fee, (6) whether fee is fixed or contingent, (7) time limitations imposed by the client or the circumstances, (8) the amount involved and the results obtained, (9) the experience, reputation, and ability of the professionals, (10) the undesirability of the case, (11) the nature and length of the professional relationship with the client, and (12) awards in similar cases. *See Am. Benefit Life Ins. Co. v. Baddock* (*In re First Colonial Corp. of Am.*), 544 F.2d 1291 (5th Cir. 1977) (*Johnson* criteria applicable in bankruptcy cases).

As set forth herein, the fees and expenses requested by this Interim Application reflect reasonable compensation for actual, necessary services provided and reimbursement of actual, necessary expenses incurred by Covington in acting as special insurance counsel to the Debtor during the Interim Fee Period. Covington's fees and expenses are necessary and reasonable in light of the time, labor, and skills required to address complex insurance issues in this case and the discounted alternative fee arrangement Covington agreed to with the Debtor.

VII. CONCLUSION

Covington requests an interim allowance of all fees and costs for the Interim Fee Period. Covington does not have any agreement or any understanding of any kind or nature to divide, pay over, or share any portion of the fees to be awarded to Covington with any other person or attorney, except among members of Covington.

Covington believes that the services rendered for which compensation is sought in this Interim Application have been beneficial to the estate, that the costs incurred have been necessary and proper, and that the sums requested for the services rendered and the costs are fair and reasonable.

WHEREFORE, Covington respectfully requests that the Court (a) authorize interim allowance and direct payment of fees and costs, (b) award interim compensation to Covington in the amount of $409,362.36, inclusive of all fees and costs for the period from May 1, 2026 to August 31, 2026, and (c) grant such other and further relief as may be appropriate under the circumstances.

DATED: October 30, 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
Salesforce Tower, 415 Mission Street, Suite 5400
San Francisco, CA 94105

Special Insurance Counsel for the Debtor

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EXHIBIT A

COVINGTON RETENTION ORDER

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Entered on Docket
EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
Docket #2450 Date Filed: 11/12/2025

FOLEY & LARDNER LLP
Eileen R. Ridley (CA Bar No. 151735)
Tel: (415) 438-6469; eridley@foley.com
Shane J. Moses (CA Bar No. 250533)
Tel: (415) 438-6404; smoses@foley.com
Ann Marie Uetz (admitted *pro hac vice*)
Tel: (313) 234-7114; auetz@foley.com
Matthew D. Lee (admitted *pro hac vice*)
Tel: (608) 258-4203; mdlee@foley.com
Geoffrey S. Goodman (admitted *pro hac vice*)
Tel: (312) 832-4515; ggoodman@foley.com
Mark C. Moore (admitted *pro hac vice*)
Tel: (214) 999-4150; mmoore@foley.com
555 California Street, Suite 1700
San Francisco, CA 94104-1520

Counsel for the Debtor
and Debtor in Possession

COVINGTON & BURLING, LLP
David B. Goodwin (CA Bar No. 104469)
Tel: (415) 591-7074; dgoodwin@cov.com
Christine S. Haskett (CA Bar No.188053)
Tel: (415) 591-7087; chaskett@cov.com
Salesforce Tower, 415 Mission Street, Suite 5400
San Francisco, CA 94105

Proposed Special Insurance Counsel for
the Debtor

The following constitutes the order of the Court.
Signed: November 12, 2025

William J. Lafferty, III
U.S. Bankruptcy Judge

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

ORDER APPROVING DEBTOR'S APPLICATION TO EMPLOY COVINGTON & BURLING LLP AS SPECIAL INSURANCE COUNSEL

Judge: Hon. William J. Lafferty

Case: 23-40523 Doc# 2450-1 Filed: 11/12/25 Entered: 11/30/25 12:07:31 Page 2 of 5
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Upon the application [Docket No. 2416] (the "Application")[1] filed by The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or the "Bankruptcy Case"), pursuant to sections 327(a) and 1107 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016, for entry of an order authorizing the employment and retention of Covington & Burling LLP ("Covington") to represent the Debtor as special insurance counsel, on the terms described in the Application and as more fully set forth therein; and due and proper notice of the Application having been given; and the Court having found that it has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334, that this is a core proceeding under 28 U.S.C. §§ 157(a)-(b) and 1334(b), and that venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409; and the Court being satisfied, based on the representations made in the Application and the Declaration of David B. Goodwin in support thereof, that Covington does not hold or represent any interest adverse to the Debtor's estate in the above-captioned case and is disinterested under section 101(14) and meets the requirements for employment under section 327(a) of the Bankruptcy Code; and the Court finding that cause exists for the entry of this Order authorizing the employment of Covington as special insurance counsel for the Debtor effective as of October 7, 2025, including that such employment is in the best interests of the Debtor's estate;

IT IS HEREBY ORDERED that:

1. The Application is APPROVED as set forth in this Order.

2. The Debtor is authorized to retain and employ Covington as its special insurance counsel effective as of October 7, 2025, under the terms set forth in the Application.

3. Covington's compensation and reimbursement in respect to its fees and expenses incurred representing the Debtor shall be subject to further order of the Court in accordance with the procedures and standards set forth in sections 330 and 331 of the Bankruptcy Code, such Federal Rules of Bankruptcy Procedure and local rules as may be applicable from time to time, and such procedures as may be fixed by order of this Court, as well as the *United States Bankruptcy Court Northern District of California Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees, effective*

[1] Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

February 19, 2014, and the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013*.

4. Notwithstanding anything to the contrary in this Order or the Application, the Court is not approving terms and conditions of Covington's employment under 11 U.S.C. § 328(a).

5. In the event of any inconsistency between the Application and this Order, this Order shall govern.

6. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

*** END OF ORDER ***

COURT SERVICE LIST

All ECF Recipients.

EXHIBIT B

CUSTOMARY AND COMPARABLE DISCLOSURES WITH FEE APPLICATIONS

(*SEE* GUIDELINES **C.3** FOR DEFINITION OF TERMS USED IN THIS EXHIBIT)

Category of Timekeeper	Blended Hourly Rate	
	BILLED Firm for preceding year, excluding bankruptcy	**BILLED In the Interim Fee Period**
Partner[2]	$1,499.24	$1,180.00
Associate[3]	$1,068.83	$1,180.00
Paralegal	$518.86	$624.73
All timekeepers aggregated	$1,173.30	$1,154.28

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Covington & Burling LLP
Date of Application:	October 30, 2026
Interim or Final:	Interim

[2] Partner category includes Of Counsel.

[3] Associate category includes Senior Counsel and Special Counsel.

Case: 23-40523 Doc# 3581-2 Filed: 10/30/26 Entered: 10/30/26 12:07:31 Page 1 of 1

EXHIBIT C

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

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	83.50	$98,530.00
Abigail V. O'Brient	Partner, 2009	$1,180.00	3.10	$3,658.00
David Goodwin	Senior Counsel, 1982	$1,180.00	86.10	$101,598.00
Julia C. Philips Roth	Associate, 2019	$1,180.00	10.50	$12,390.00
Sean M. Bender	Associate, 2021	$1,180.00	59.10	$69,738.00
Harper A. Johnson	Associate, 2025	$1,180.00	95.60	$112,808.00
E. Tracy Brown	Paralegal, N/A	$810.00	1.20	$972.00
Jeaneth S. Decena	Paralegal, N/A	$607.50	12.90	$7,836.75
Maryam Amini	Law Clerk, N/A	$292.50	1.00	$292.50
Jeanette S. Mukta	Document Support Specialist, N/A	$247.50	0.40	$99.00
TOTAL			**353.40**	**$407,922.25**

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Covington & Burling LLP
Date of Application:	October 30, 2026
Interim or Final:	Interim

EXHIBIT D

SUMMARY OF COMPENSATION REQUESTED BY CATEGORY

(*SEE* GUIDELINES ¶**C.8** FOR PROJECT CATEGORY INFORMATION)

Category	Hours Billed this Fee Period	Total for Fee Statement
001 – General Insurance Advice	344.60	$397,538.25
002 – Fee and Employment Applications	8.80	$10,384.00
TOTAL	**353.40**	**$407,922.25**

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Covington & Burling LLP
Date of Application:	October 30, 2026
Interim or Final:	Interim

Case: 23-40523 Doc# 3581-4 Filed: 10/30/26 Entered: 10/30/26 12:07:31 Page 1 of 1

EXHIBIT E

SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY

(*SEE* GUIDELINES ¶**C.8** FOR PROJECT CATEGORY INFORMATION)

Costs/Expense	Amount Billed
Electronic Legal Research Services	$1,013.32
Other – Monthly Disk Storage	$73.10
Court Fees	$328.00
Miscellaneous Costs	$25.69
TOTAL	**$1,440.11**

Case Name:	The Roman Catholic Bishop of Oakland
Case Number:	23-bk-40523
Applicant's Name:	Covington & Burling LLP
Date of Application:	October 30, 2026
Interim or Final:	Interim

Case: 23-40523 Doc# 3581-5 Filed: 10/30/26 Entered: 10/30/26 12:07:31 Page 1 of 1

EXHIBIT F

COVINGTON BUDGET AND STAFFING PLAN

The Covington attorneys staffed on this case, subject to modification depending on further development, are set forth in (1) the Declaration of Attila Bardos in Support of Debtor's Application to Employ Covington & Burling LLP as Special Insurance Counsel Pursuant to 11 U.S.C. 327(a), 330, 331, & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure, and (2) supplemented as set forth in Exhibit C of this Interim Application, and the Debtor has approved that staffing.

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EXHIBIT G

COVINGTON INVOICES

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COVINGTON

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

Covington & Burling LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 6000

Matthew Kemner
General Counsel, Roman Catholic Diocese of Oakland
Roman Catholic Diocese of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

June 24, 2026

Invoice No.: 61190752
Account: 048691.00001

Roman Catholic Bishop of Oakland

Re: General Insurance Advice

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

Fees:	**$**	**134,003.75**
Disbursements:		
Westlaw Research	$	164.75
Disbursements	**$**	**164.75**
Total Fees and Disbursements:	**$**	**134,168.50**
TOTAL AMOUNT DUE:	**$**	**134,168.50**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L120 - Analysis/Strategy				
05/01/26	David Goodwin	Revise draft status conference statements for Judge Corley (.80); draft response to question from Mr. Bair for the UCC (.10).	0.90	$1,062.00
05/02/26	Christine Saunders Haskett	Review and respond to emails re upcoming status conference.	0.20	$236.00
05/04/26	David Goodwin	Analyze insurers' reply briefs on motion to strike (.30); emails regarding hearing before Judge Corley in insurance case (.10).	0.40	$472.00
05/04/26	Julia C. Philips Roth	Conduct research and diligence re potential committee motion to dismiss chapter 11 case	0.50	$590.00
05/06/26	David Goodwin	Emails regarding insurance discovery requests.	0.10	$118.00
05/08/26	Abigail V. O'Brient	Respond to question from D. Goodwin re approval of disclosure statement.	0.10	$118.00
05/08/26	David Goodwin	Emails regarding amendment to insurance complaint (.20); draft responses to Chubb discovery requests (.60).	0.80	$944.00
05/08/26	Harper A. Johnson	Review updates from C. Haskett regarding Further Case Management Conference and resulting action items.	0.20	$236.00
05/08/26	Julia C. Philips Roth	Conduct research and diligence re potential committee motion to dismiss chapter 11 case	1.30	$1,534.00
05/09/26	David Goodwin	Emails regarding amendments to the insurance complaint.	0.10	$118.00
05/11/26	David Goodwin	Revise draft sixth amended complaint (.50); analyze insurance issues in bankruptcy plan funding (.40); attend team meeting (.80).	1.70	$2,006.00
05/11/26	Harper A. Johnson	Confer with D. Goodwin and C. Haskett regarding case updates, responses to Pacific Indemnity discovery requests, and align on action items (0.9).	0.90	$1,062.00
05/11/26	Harper A. Johnson	Review correspondence from Westport regarding RCBO's bad faith letter (.3).	0.30	$354.00
05/11/26	Julia C. Philips Roth	Analyze draft responses to RFAs re bankruptcy issues in insurance coverage litigation (0.2) and communicate with A. O'Brient, H. Johnson, D. Goodwin, and C. Haskett re same (0.4)	0.60	$708.00

Date	Timekeeper	Description	Hours	Amount
05/12/26	Christine Saunders Haskett	Telephone and email with co-counsel re discussions with insurers (0.2); telephone conference with insurers re developments in underlying matters (0.7).	0.90	$1,062.00
05/13/26	David Goodwin	Revise draft discovery requests (.20); emails regarding insurance adversary proceeding pleading issues (.10); revise draft complaint (.10).	0.40	$472.00
05/14/26	David Goodwin	Analyze insurer objections to RCBO's proposed plan (1.60); revise responses to discovery requests (.40); revise draft complaint (.30).	2.30	$2,714.00
05/15/26	Christine Saunders Haskett	Telephone conference with team re discovery strategy issues (0.8); email with team, co-counsel, and opposing counsel re stipulation required by court and briefing schedules (0.8).	1.60	$1,888.00
05/15/26	David Goodwin	Emails regarding discovery requests (.10); revise draft responses to discovery requests (1.50); attend team call regarding insurance coverage litigation strategy (.80).	2.30	$2,714.00
05/15/26	Sean M. Bender	Call with C. Haskett et al. to discuss status of discovery and upcoming tasks.	0.80	$944.00
05/15/26	Harper A. Johnson	Confer with C. Haskett, D. Goodwin, and S. Bender regarding case status and align on action items (0.8).	0.80	$944.00
05/15/26	Harper A. Johnson	Prepare responses to Pacific Indemnity discovery requests, incorporate feedback from team.	3.50	$4,130.00
05/16/26	Christine Saunders Haskett	Email insurer counsel re court-required stipulation.	0.20	$236.00
05/16/26	David Goodwin	Revise draft responses to insurance interrogatories.	0.80	$944.00
05/18/26	Christine Saunders Haskett	Email re stipulation re briefing on amended complaint (0.2); review and analyze discovery strategy issues (0.2).	0.40	$472.00
05/18/26	Jeaneth S. Decena	Download objections to the debtor's modified fourth amended plan of reorganization and review policies attached as exhibits thereto and compare them with documents on file, per H. Johnson's instructions.	1.10	$668.25
05/18/26	Maryam Amini	Review Stipulation and [Proposed] Order Regarding Amendment of Complaint and Briefing Schedule for Motions to Dismiss, and prepare for filing per local rules.	0.10	$29.25

Date	Timekeeper	Description	Hours	Amount
05/20/26	Christine Saunders Haskett	Telephone with client re insurance strategy in connection with developments in underlying matter (0.2); review and respond to emails re same (0.7).	0.90	$1,062.00
05/21/26	Christine Saunders Haskett	Telephone with bankruptcy counsel re client's insurance assignment questions (0.2); email client re same (0.2); telephone conference with team re case status and strategy issues (0.3).	0.70	$826.00
05/21/26	Abigail V. O'Brient	Confer with C. Haskett re insurance/plan strategy issue.	0.20	$236.00
05/21/26	David Goodwin	Attend team meeting (.30); conference regarding coverage issues (.50); revise draft discovery requests (.30); revise draft emails to insurers (.40); analyze insurance coverage issues (.30).	1.80	$2,124.00
05/21/26	Sean M. Bender	Call with C. Haskett et al. to discuss case status and strategy.	0.50	$590.00
05/21/26	Sean M. Bender	Call with D. Goodwin and H. Johnson to discuss coverage issues.	0.50	$590.00
05/21/26	Harper A. Johnson	Attend team meeting to discuss case updates and align on action items (0.3); attend meeting with D. Goodwin and S. Bender to discuss coverage issues facing RCBO and relevant case law (0.5).	0.80	$944.00
05/23/26	Christine Saunders Haskett	Review and analyze emails re information provided to insurers.	0.20	$236.00
05/26/26	Harper A. Johnson	Review materials sent by Foley co-counsel and prepare list of documents to request.	0.20	$236.00
05/27/26	David Goodwin	Draft meet and confer letters (1.20); analyze settlement proposal (.40) .	1.60	$1,888.00
05/28/26	David Goodwin	Emails with Mr. Kemner regarding settlement strategy (.40); telephone with Mr. Kemner regarding settlement strategy (.20); draft summary of settlement strategy issues for Mr. Kemner (.70); emails with Mr. Ridley regarding discovery requests (.10); emails with Ms. Ridley regarding document production issues (.30).	1.70	$2,006.00
05/29/26	Christine Saunders Haskett	Review and respond to emails re correspondence with insurers.	0.20	$236.00
05/29/26	David Goodwin	Emails regarding applicable limits of liability (.10); respond to questions concerning CIGA negotiations (.20); revise draft letter to Mr.	0.40	$472.00

Date	Timekeeper	Description	Hours	Amount
		Chorley (.10) .		
05/29/26	Sean M. Bender	Review recent Ninth Circuit coverage decision and correspond with D. Goodwin re same.	0.30	$354.00
05/30/26	Christine Saunders Haskett	Review and respond to emails re correspondence with insurers and related strategy issues.	0.80	$944.00
Subtotal:	**L120 - Analysis/Strategy**		**34.10**	**$39,519.50**
L130 - Experts/Consultants				
05/26/26	Sean M. Bender	Research case law on discovery obligations and revise insurer letters to incorporate findings.	1.20	$1,416.00
Subtotal:	**L130 - Experts/Consultants**		**1.20**	**$1,416.00**
L140 - Document/File Management				
05/01/26	Maryam Amini	Review Joint Status Update and prepare for filing per local rules.	0.20	$58.50
05/19/26	Maryam Amini	Review Sixth Amended Complaint for Declaratory Judgment Relief, Breach of Statutory Duty, and Breach of the Implied Covenant of Good Faith and Fair Dealing, and prepare for filing per local rules.	0.50	$146.25
05/21/26	Harper A. Johnson	Review materials sent from Foley co-counsel and prepare list of documents to request (0.3).	0.30	$354.00
Subtotal:	**L140 - Document/File Management**		**1.00**	**$558.75**
L160 - Settlement/Non-Binding ADR				
05/27/26	Christine Saunders Haskett	Telephone with client re potential CIGA settlement.	0.10	$118.00
05/28/26	Christine Saunders Haskett	Review and respond to emails re CIGA settlement strategy issues.	1.10	$1,298.00
Subtotal:	**L160 - Settlement/Non-Binding ADR**		**1.20**	**$1,416.00**
L210 - Pleadings				
05/04/26	Harper A. Johnson	Review insurers' reply ISO motion to strike.	0.50	$590.00
05/11/26	Christine Saunders Haskett	Conference with team re revisions to amended complaint (0.5); email with opposing counsel re stipulation re same (0.5).	1.00	$1,180.00
05/11/26	Harper A.	Prepare updated SIxth Amended Complaint and	3.80	$4,484.00

Date	Timekeeper	Description	Hours	Amount
	Johnson	incorporate edits from team (3.8).		
05/12/26	Christine Saunders Haskett	Review and revise draft amended complaint.	0.70	$826.00
05/12/26	Harper A. Johnson	Prepare updated sixth amended complaint (1.7).	1.70	$2,006.00
05/13/26	Christine Saunders Haskett	Review and revise draft amended complaint.	1.00	$1,180.00
05/13/26	Harper A. Johnson	Prepare updated sixth amended complaint (3.3).	3.30	$3,894.00
05/14/26	Christine Saunders Haskett	Review and revise draft amended complaint and email re same.	0.80	$944.00
05/14/26	Harper A. Johnson	Prepare updated Sixth Amended Complaint with feedback from team and Foley, share with insurer counsel (2.6).	2.60	$3,068.00
05/19/26	Harper A. Johnson	Incorporate feedback into responses to Pacific Indemnity discovery (0.2).	0.20	$236.00
05/19/26	Harper A. Johnson	Prepare and file Sixth Amended Complaint (1.1)	1.10	$1,298.00
Subtotal:	**L210 - Pleadings**		**16.70**	**$19,706.00**
L230 - Court Mandated Conferences				
05/04/26	Christine Saunders Haskett	Prepare for discovery conference with court.	0.80	$944.00
05/07/26	Christine Saunders Haskett	Prepare for discovery conference with court (0.9); telephone with client re same (0.1); telephone conference with co-counsel re same (0.7).	1.70	$2,006.00
05/07/26	David Goodwin	Attend conference call with Foley team to prepare for discovery hearing before Judge Corley.	0.70	$826.00
05/08/26	Christine Saunders Haskett	Conference with co-counsel in preparation for discovery conference with court (1.0); attend same (4.9); email with team re same (0.3).	6.20	$7,316.00
Subtotal:	**L230 - Court Mandated Conferences**		**9.40**	**$11,092.00**
L250 - Other Written Motions & Submissions				
05/01/26	Christine	Email re draft status conference statements.	0.30	$354.00

Date	Timekeeper	Description	Hours	Amount
	Saunders Haskett			
05/01/26	Harper A. Johnson	Prepare and file joint status update with AHAC (1.4) and provide feedback on joint status update with other insurers (0.3).	1.70	$2,006.00
05/03/26	Christine Saunders Haskett	Review and analyze insurer replies in support of motions to strike amended complaint (0.7); review and analyze status reports in preparation for status conference (0.7).	1.40	$1,652.00
05/09/26	Christine Saunders Haskett	Draft stipulation re amendment of complaint and briefing schedule (0.4); email with team re same (0.4).	0.80	$944.00
05/09/26	Harper A. Johnson	Review draft joint stipulation, and add AHAC caption page to draft.	0.50	$590.00
05/10/26	Christine Saunders Haskett	Revise draft stipulation re amendment of complaint (0.3); email re same (0.2).	0.50	$590.00
05/17/26	Christine Saunders Haskett	Revise stipulation re amendment of complaint and motion briefing and email insurers re same.	0.40	$472.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**5.60**	**$6,608.00**
L310 - Written Discovery				
05/01/26	Harper A. Johnson	Prepare responses to Pacific Indemnity discovery requests and incorporate feedback from M. Roberts.	1.40	$1,652.00
05/01/26	Harper A. Johnson	Confer with M. Roberts regarding RCBO responses to Pacific Indemnity discovery (1).	1.00	$1,180.00
05/06/26	Harper A. Johnson	Prepare responses to Pacific Indemnity's first set of Requests for Admission.	1.00	$1,180.00
05/07/26	Harper A. Johnson	Prepare responses to Pacific Indemnity's first set of discovery requests, including interrogatories and requests for admission.	3.20	$3,776.00
05/09/26	Harper A. Johnson	Prepare Pacific Indemnity discovery responses and incorporate feedback from D. Goodwin (.9).	0.90	$1,062.00
05/10/26	Christine Saunders Haskett	Review and analyze draft responses to insurer discovery requests.	0.80	$944.00
05/11/26	Christine Saunders Haskett	Review and analyze strategy issues in connection with draft discovery responses (1.0); conference with team re same (0.5).	1.50	$1,770.00

Date	Timekeeper	Description	Hours	Amount
05/11/26	Abigail V. O'Brient	Review insurer discovery requests related to bankruptcy case and proposed responses; internal emails re same.	0.20	$236.00
05/11/26	Harper A. Johnson	Update discovery responses per feedback from team (1.6).	1.60	$1,888.00
05/11/26	Jeaneth S. Decena	Format RCBO's Second Set of RFPs and First Set of Interrogatories and Update Certificate of Service thereof.	1.20	$729.00
05/12/26	Christine Saunders Haskett	Review and comment on draft discovery responses.	1.30	$1,534.00
05/12/26	David Goodwin	Emails regarding issues raised by discovery requests in insurance case (.20); revise draft discovery responses (.30); revise draft complaint (.60).	1.10	$1,298.00
05/12/26	Harper A. Johnson	Update responses to Pacific Indemnity discovery with feedback from team (.6).	0.60	$708.00
05/13/26	Christine Saunders Haskett	Review and revise draft discovery responses.	1.20	$1,416.00
05/13/26	Harper A. Johnson	Update responses to Pacific Indemnity requests for admission with comments from C. Haskett and D. Goodwin (0.2).	0.20	$236.00
05/13/26	Harper A. Johnson	Prepare and serve discovery requests on AHAC (0.2).	0.20	$236.00
05/13/26	Jeaneth S. Decena	Update Service List, finalize First Set of Interrogatories and Second Set of Request for Production to American Home and serve the same.	2.00	$1,215.00
05/14/26	Christine Saunders Haskett	Review and respond to emails re discovery strategy issues (0.6); review and revise draft discovery responses (1.0).	1.60	$1,888.00
05/14/26	Harper A. Johnson	Prepare responses to Pacific Indemnity discovery requests with feedback from team and Foley (2.8).	2.80	$3,304.00
05/15/26	Christine Saunders Haskett	Review and respond to emails re draft discovery responses.	0.60	$708.00
05/17/26	Christine Saunders Haskett	Review and revise draft discovery responses.	1.20	$1,416.00
05/17/26	Harper A.	Incorporate edits from C. Haskett and D.	0.70	$826.00

Date	Timekeeper	Description	Hours	Amount
	Johnson	Goodwin to responses to Pacific Indemnity discovery requests and circulate responses to Foley co-counsel and client.		
05/18/26	Sean M. Bender	Research Ninth Circuit case law on requirements for privilege assertions in discovery responses.	0.50	$590.00
05/18/26	Sean M. Bender	Draft letter to CNA responding to deficiencies in discovery responses.	1.20	$1,416.00
05/18/26	Harper A. Johnson	Review discovery responses from insurers and prepare summary for S. Bender (1.2).	1.20	$1,416.00
05/18/26	Harper A. Johnson	Prepare and file joint stipulation with confirmation from all insurers.	0.20	$236.00
05/19/26	Christine Saunders Haskett	Review and respond to emails re draft discovery responses.	0.40	$472.00
05/19/26	David Goodwin	Revise draft discovery responses.	0.20	$236.00
05/19/26	Sean M. Bender	Correspond with H. Johnson re insurer discovery responses.	0.30	$354.00
05/19/26	Sean M. Bender	Review draft RFA and SROG responses.	0.50	$590.00
05/19/26	Sean M. Bender	Revise draft letter to CNA to incorporate comments from C. Haskett.	0.40	$472.00
05/20/26	Christine Saunders Haskett	Review and comment on draft discovery responses (0.9); review and revise draft meet and confer correspondence re insurer discovery responses (0.4).	1.30	$1,534.00
05/20/26	David Goodwin	Analyze insurance-related discovery issues (.20); revise draft request for admission responses (.10); revise draft meet and confer letter (.20).	0.50	$590.00
05/20/26	Sean M. Bender	Correspond with D. Goodwin re comments to draft discovery responses.	0.30	$354.00
05/20/26	Harper A. Johnson	Prepare and serve responses to Interrogatories (1.8), Requests for Admission (0.9), and Requests for Production from Pacific Indemnity (1.1).	3.80	$4,484.00
05/20/26	Jeaneth S. Decena	Compare further policies attached to the insurers' objections to the debtor’s modified fourth amended plan of reorganization and those on file per H. Johnson's instructions.	0.50	$303.75
05/20/26	Jeaneth S. Decena	Finalize objections and responses to Pacific Indemnity discovery requests (interrogatories, requests for admission and requests for	2.90	$1,761.75

Date	Timekeeper	Description	Hours	Amount
		production), and serve the same.		
05/22/26	Sean M. Bender	Revise discovery deficiency letter to CNA to address comments and edits from D. Goodwin and C. Haskett (.8); review discovery responses from insurers (.5); draft discovery deficiency letter to US Fire (1.3); draft discovery deficiency letter to Lloyds (1.5); draft discovery deficiency letter to Westport (.9); draft discovery deficiency letter to Travelers (.6).	5.60	$6,608.00
05/27/26	Sean M. Bender	Research California case law on assertions of privilege in interrogatory responses.	0.70	$826.00
05/27/26	Sean M. Bender	Correspond with counsel from Foley re discovery deficiency letters.	0.20	$236.00
05/27/26	Sean M. Bender	Revise discovery deficiency letters to incorporate comments from D. Goodwin.	1.70	$2,006.00
Subtotal:	**L310 - Written Discovery**		**48.70**	**$53,687.50**
Total			**117.90**	**$134,003.75**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
Haskett, Christine Saunders	Partner	32.80	1,180.00	$	38,704.00
O'Brient, Abigail V.	Partner	0.50	1,180.00	$	590.00
Goodwin, David	Senior Counsel	17.80	1,180.00	$	21,004.00
Bender, Sean M.	Associate	14.70	1,180.00	$	17,346.00
Johnson, Harper A.	Associate	41.20	1,180.00	$	48,616.00
Philips Roth, Julia C.	Associate	2.40	1,180.00	$	2,832.00
Decena, Jeaneth S.	Paralegal	7.70	607.50	$	4,677.75
Amini, Maryam	Law Clerk	0.80	292.50	$	234.00
Totals		**117.90**		$	**134,003.75**

Task Summary

Task Code	Description	Amount
L230	Court Mandated Conferences	$11,092.00
L310	Written Discovery	$53,687.50
L140	Document/File Management	$558.75
L120	Analysis/Strategy	$39,519.50
L130	Experts/Consultants	$1,416.00
L210	Pleadings	$19,706.00
L250	Other Written Motions & Submissions	$6,608.00
L160	Settlement/Non-Binding ADR	$1,416.00

Disbursement Summary

Description		Amount
Westlaw Research	$	164.75
Totals	$	**164.75**

COVINGTON

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

Covington & Burling LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 6000

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

June 24, 2026

Invoice No.: 61190601
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 May 31, 2026:

Fees:	**$**	**472.00**
TOTAL AMOUNT DUE:	**$**	**472.00**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L250 - Other Written Motions & Submissions				
05/06/26	Julia C. Philips Roth	Communicate with Debtor's counsel re omnibus order approving interim fee applications	0.10	$118.00
05/07/26	Julia C. Philips Roth	Analyze draft omnibus order approving interim fee applications (0.1) and communicate with Debtor's counsel re same (0,1)	0.20	$236.00
05/08/26	Julia C. Philips Roth	Finalize and coordinate filing of certificate of no objection to sixth monthly fee application	0.10	$118.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**0.40**	**$472.00**
Total			**0.40**	**$472.00**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
Philips Roth, Julia C.	Associate	0.40	1,180.00	$	472.00
Totals		**0.40**		$	**472.00**

Task Summary

Task Code	Description	Amount
L250	Other Written Motions & Submissions	$472.00

COVINGTON

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

Covington & Burling LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 6000

Matthew Kemner
General Counsel, Roman Catholic Diocese of Oakland
Roman Catholic Diocese of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

July 24, 2026

Invoice No.: 61194965
Account: 048691.00001

Roman Catholic Bishop of Oakland

Re: General Insurance Advice

For professional services rendered in connection with the above referenced matter through June 30, 2026:

Fees:	**$**	**68,128.00**
Disbursements:		
Computer Research	$	98.50
Court Fees	$	328.00
Miscellaneous Costs	$	25.69
Lexis Research	$	40.97
Westlaw Research	$	347.92
Monthly Disk Storage	$	36.60
Disbursements	**$**	**877.68**
Total Fees and Disbursements:	**$**	**69,005.68**
TOTAL AMOUNT DUE:	**$**	**69,005.68**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L110 - Fact Investigation/Development				
06/11/26	Harper A. Johnson	Review available documents for missing categories and prepare request for such documents for co-counsel.	0.50	$590.00
06/16/26	Harper A. Johnson	Correspond with co-counsel regarding missing documents and insurance policy information and review provided documents.	0.20	$236.00
06/17/26	E. Tracy Brown	Update coverage chart and policy register with additional policy information.	1.20	$972.00
Subtotal:	**L110 - Fact Investigation/Development**		**1.90**	**$1,798.00**
L120 - Analysis/Strategy				
06/01/26	David Goodwin	Analyze insurers' comments on Woodall brief (.30); respond to comments with insurance-related recommendations (.80).	1.10	$1,298.00
06/01/26	Harper A. Johnson	Review correspondence including draft brief in support of motion for a new trial and remittitur and coverage letter from London Market Insurers regarding RCWC v. John Doe.	0.30	$354.00
06/02/26	David Goodwin	Emails regarding coverage issues under London Market Insurers' policies.	0.30	$354.00
06/04/26	David Goodwin	Analyze issues regarding submissions to CIGA (.30) provide strategic input on discovery issues (.40)	0.70	$826.00
06/05/26	David Goodwin	Analyze insurers in limine filings.	0.30	$354.00
06/08/26	David Goodwin	Analyze insurance issues in connection with confirmation hearing	0.90	$1,062.00
06/09/26	David Goodwin	Emails with Mr. Kemner regarding coverage issues.	0.10	$118.00
06/10/26	David Goodwin	Emails regarding insurer in limine briefing.	0.10	$118.00
06/11/26	David Goodwin	Analyze insurer bankruptcy court filings.	0.40	$472.00
06/12/26	Christine Saunders Haskett	Telephone conference with team re discovery and motion to dismiss strategy issues (0.4); review and respond to emails re complaint and related motion to dismiss issues (0.5).	0.90	$1,062.00
06/12/26	David Goodwin	Attend team meeting (.40); comment on American Home's request for RCBO to amend the Sixth Amended Complaint (.20).	0.60	$708.00

Date	Timekeeper	Description	Hours	Amount
06/12/26	Sean M. Bender	Meeting with C. Haskett et al. to discuss case status and plan for upcoming work.	0.40	$472.00
06/12/26	Harper A. Johnson	Correspond with co-counsel regarding filings under seal in bankruptcy proceeding in an effort to track down copies of client's insurance policies.	0.30	$354.00
06/12/26	Harper A. Johnson	Attend team meeting to discuss case updates and action items.	0.40	$472.00
06/15/26	David Goodwin	Emails regarding insurer bankruptcy court filings.	0.10	$118.00
06/16/26	Sean M. Bender	Review draft stipulation from American Home re policy language.	0.20	$236.00
06/17/26	David Goodwin	Emails regarding motions to dismiss (.10); provide input on draft reply brief in support of new trial in underlying matter (.10)	0.20	$236.00
06/18/26	Abigail V. O'Brient	Confer with D. Goodwin re bankruptcy procedural issue related to insurance AP.	0.20	$236.00
06/18/26	Sean M. Bender	Review and analyze Ordinary Mutual policy and correspond with team re same.	0.30	$354.00
06/19/26	Christine Saunders Haskett	Review and analyze strategy issues in connection with commencement of fee arbitration.	0.40	$472.00
06/22/26	David Goodwin	Attend team meeting (.60); emails regarding motions to dismiss (.10); analyze Ordinary Mutual policy (.20).	0.90	$1,062.00
06/22/26	Sean M. Bender	Review Ordinary Mutual policy and correspond with D. Goodwin re same.	0.30	$354.00
06/23/26	Christine Saunders Haskett	Telephone with client re strategy issues in connection with preparation for fee arbitration against insurer.	0.40	$472.00
06/25/26	David Goodwin	Emails regarding insurance coverage issues presented in the tort cases.	0.10	$118.00
06/29/26	Sean M. Bender	Review draft status update to court (.2); correspond with C. Haskett and D. Goodwin re status update to court (.2); draft edits to status update to court (.5).	0.90	$1,062.00
06/30/26	Christine Saunders Haskett	Review and respond to emails re draft correspondence to insurer re drop-down issue.	0.40	$472.00
06/30/26	David Goodwin	Revise draft status conference statement (.20); analyze coverage issues under excess policies that may respond to tort cases (.40); emails with	0.80	$944.00

Date	Timekeeper	Description	Hours	Amount
		Ms. Ridley regarding excess coverage (.10); emails regarding motions to dismiss (.10) .		
Subtotal:	**L120 - Analysis/Strategy**		**12.00**	**$14,160.00**
L140 - Document/File Management				
06/05/26	Jeaneth S. Decena	Review docket of the bankruptcy matter re motion in limine filed by Pacific Insurers (0.3); contact Foley & Lardner to request unredacted copy of the motion and supporting documents (0.2).	0.50	$303.75
06/08/26	Jeaneth S. Decena	Follow up with S. Moses regarding request for a copy of Sealed MIL and ancillary documents filed by Pacific Insurers.	0.30	$182.25
Subtotal:	**L140 - Document/File Management**		**0.80**	**$486.00**
L160 - Settlement/Non-Binding ADR				
06/04/26	Christine Saunders Haskett	Email re CIGA settlement issues.	0.20	$236.00
06/16/26	Christine Saunders Haskett	Email re CIGA settlement issues.	0.10	$118.00
06/16/26	David Goodwin	Revise draft stipulation to extend CIGA's time to respond to complaint in connection with potential settlement (.10); emails with counsel for CIGA (.10).	0.20	$236.00
Subtotal:	**L160 - Settlement/Non-Binding ADR**		**0.50**	**$590.00**
L210 - Pleadings				
06/12/26	Sean M. Bender	Correspond with H. Johnson, D. Goodwin, and C. Haskett re questions about allegations in sixth amended complaint.	0.20	$236.00
06/16/26	Harper A. Johnson	Prepare and file stipulation extending time for CIGA to respond to the Sixth Amended Complaint due to ongoing settlement discussions.	0.60	$708.00
06/23/26	Christine Saunders Haskett	Review and respond to emails re strategy in connection with correction of amended complaint against AIG.	0.40	$472.00
06/23/26	David Goodwin	Prepare response to demand from American Home to strike portion of complaint.	0.50	$590.00
06/24/26	David Goodwin	Revise draft stipulation to amend insurance complaint.	0.10	$118.00

Date	Timekeeper	Description	Hours	Amount
Subtotal:	**L210 - Pleadings**		**1.80**	**$2,124.00**
L230 - Court Mandated Conferences				
06/25/26	Christine Saunders Haskett	Email re case management statement in preparation for court-ordered CMC.	0.20	$236.00
06/29/26	Christine Saunders Haskett	Review and comment on draft case management statement in preparation for case management conference with court.	0.60	$708.00
06/30/26	Christine Saunders Haskett	Review and analyze revisions to draft joint case management statement in preparation for court-ordered conference (0.7); email with team and co-counsel re same (0.6).	1.30	$1,534.00
Subtotal:	**L230 - Court Mandated Conferences**		**2.10**	**$2,478.00**
L250 - Other Written Motions & Submissions				
06/15/26	Christine Saunders Haskett	Email re insurers' anticipated motions to dismiss.	0.20	$236.00
06/17/26	Christine Saunders Haskett	Review and respond to emails re insurers' motions to dismiss.	0.30	$354.00
06/17/26	Sean M. Bender	Begin review of insurer motions to dismiss and case law cited therein.	2.60	$3,068.00
06/18/26	David Goodwin	Analyze the insurers’ motions to dismiss and outline responses.	0.60	$708.00
06/18/26	Sean M. Bender	Continue review of insurer motions to dismiss and case law cited therein.	2.00	$2,360.00
06/18/26	Harper A. Johnson	Review the insurers' motions to dismiss and confer with D. Goodwin regarding strategy for responding to same.	0.50	$590.00
06/21/26	Harper A. Johnson	Review the six separate motions to dismiss the Sixth Amended Complaint filed by the insurers.	1.80	$2,124.00
06/22/26	Christine Saunders Haskett	Review and analyze insurer motions to dismiss (0.4); telephone conference with team re strategy for responding to same (0.6).	1.00	$1,180.00
06/22/26	Sean M. Bender	Review briefing filed in Fox Paine CA supreme court appeal in connection with insurer motions.	0.60	$708.00
06/22/26	Sean M. Bender	Call with D. Goodwin, C. Haskett, and H. Johnson to discuss response to insurer motions to dismiss.	0.50	$590.00

Date	Timekeeper	Description	Hours	Amount
06/22/26	Harper A. Johnson	Prepare for and attend team meeting to discuss the insurers' motions to dismiss and strategy for opposition briefing.	0.80	$944.00
06/23/26	Harper A. Johnson	Prepare outline for opposition to insurers' motions to dismiss.	0.20	$236.00
06/24/26	Sean M. Bender	Begin drafting outline of opposition to insurer motions to dismiss.	0.90	$1,062.00
06/24/26	Harper A. Johnson	Prepare outline for opposition to the insurers' motions to dismiss	4.30	$5,074.00
06/25/26	Sean M. Bender	Finish drafting outline of opposition brief to insurer motions to dismiss.	1.80	$2,124.00
06/25/26	Harper A. Johnson	Prepare outline for opposition to the insurers' motions to dismiss, including conducting case law research.	1.00	$1,180.00
06/26/26	Christine Saunders Haskett	Review and analyze draft outline of opposition to motions to dismiss (0.7); telephone conference with team re same (0.2).	0.90	$1,062.00
06/26/26	Sean M. Bender	Additional research on case law cited in motions to dismiss.	1.50	$1,770.00
06/26/26	Sean M. Bender	Call with C. Haskett, D. Goodwin, and H. Johnson to discuss opposition brief.	0.50	$590.00
06/26/26	Harper A. Johnson	Prepare for and attend meeting with team to discuss outline and strategy for opposition to motions to dismiss .	0.40	$472.00
06/29/26	David Goodwin	Revise draft status conference statement (.20); emails in support of meet and confer efforts with insurers (.20).	0.40	$472.00
06/29/26	Sean M. Bender	Begin drafting opposition to insurer motions to dismiss.	3.70	$4,366.00
06/30/26	Sean M. Bender	Continue drafting opposition to insurer motion to dismiss.	4.50	$5,310.00
06/30/26	Harper A. Johnson	Prepare opposition to the insurers' motions to dismiss.	0.30	$354.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**31.30**	**$36,934.00**
L300 - DISCOVERY				
06/04/26	Sean M. Bender	Revise discovery deficiency letters to address comments from Foley.	1.00	$1,180.00
06/06/26	Christine Saunders Haskett	Review and respond to emails re discovery strategy issues.	0.60	$708.00

Date	Timekeeper	Description	Hours	Amount
06/11/26	Sean M. Bender	Correspond with D. Goodwin and C. Haskett re deficiency letters.	0.20	$236.00
06/12/26	Sean M. Bender	Review draft responses to UCC's insurance-focused RFAs.	0.70	$826.00
06/22/26	Sean M. Bender	Multiple emails with opposing counsel regarding discovery response deficiencies.	0.50	$590.00
06/24/26	Sean M. Bender	Correspond with opposing counsel re discovery responses.	0.20	$236.00
06/24/26	Sean M. Bender	Review discovery correspondence from Lloyds and correspond with team re same.	0.30	$354.00
06/26/26	David Goodwin	Emails regarding preparation for “meet and confer” call (.10); draft outline of opposition to motions to dismiss (1.20); conference re same (.20) .	1.50	$1,770.00
06/26/26	Sean M. Bender	Prepare for and attend meet and confer with Travelers to discuss discovery responses.	0.80	$944.00
06/26/26	Sean M. Bender	Correspond with U.S. Fire re discovery responses.	0.20	$236.00
06/26/26	Harper A. Johnson	Attend meet and confer with Travelers regarding deficient discovery responses.	0.30	$354.00
06/27/26	Christine Saunders Haskett	Review and respond to emails re discovery meet and confer issues.	0.30	$354.00
06/29/26	Sean M. Bender	Draft email to opposing counsel memorializing meet and confer call.	0.40	$472.00
06/29/26	Sean M. Bender	Draft responses to CNA, Chubb, and Lloyds re requested meet and confer.	0.60	$708.00
06/29/26	Sean M. Bender	Prepare for and attend meet and confer with US Fire regarding discovery responses.	0.50	$590.00
Subtotal:	**L300 - DISCOVERY**		**8.10**	**$9,558.00**
Total			**58.50**	**$68,128.00**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
Haskett, Christine Saunders	Partner	8.20	1,180.00	$	9,676.00
O'Brient, Abigail V.	Partner	0.20	1,180.00	$	236.00
Goodwin, David	Senior Counsel	9.90	1,180.00	$	11,682.00
Bender, Sean M.	Associate	26.30	1,180.00	$	31,034.00
Johnson, Harper A.	Associate	11.90	1,180.00	$	14,042.00
Brown, E. Tracy	Paralegal	1.20	810.00	$	972.00
Decena, Jeaneth S.	Paralegal	0.80	607.50	$	486.00
Totals		**58.50**		$	**68,128.00**

Task Summary

Task Code	Description	Amount
L120	Analysis/Strategy	$14,160.00
L250	Other Written Motions & Submissions	$36,934.00
L300	DISCOVERY	$9,558.00
L110	Fact Investigation/Development	$1,798.00
L230	Court Mandated Conferences	$2,478.00
L160	Settlement/Non-Binding ADR	$590.00
L210	Pleadings	$2,124.00
L140	Document/File Management	$486.00

Disbursement Summary

Description		Amount
Monthly Disk Storage	$	36.60
Lexis Research	$	40.97
Westlaw Research	$	347.92
Computer Research	$	98.50
Court Fees	$	328.00
Miscellaneous Costs	$	25.69

Totals	$	**877.68**

COVINGTON

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

Covington & Burling LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 6000

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

July 24, 2026

Invoice No.: 61194966
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 June 30, 2026:

Fees:	**$**	**5,664.00**
TOTAL AMOUNT DUE:	**$**	**5,664.00**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L250 - Other Written Motions & Submissions				
06/01/26	Julia C. Philips Roth	Finalize and coordinate filing of April monthly fee statement	0.20	$236.00
06/14/26	Julia C. Philips Roth	Draft second interim fee application	1.70	$2,006.00
06/14/26	Julia C. Philips Roth	Emails to Covington team (0.2) and Foley team (0.1) re second interim fee application	0.30	$354.00
06/15/26	Abigail V. O'Brient	Review declaration in support of second interim fee application of Covington (.2); review and revise second interim fee application of Covington (.4); confer with J. Philips Roth re revisions to second interim fee application of Covington (.1); email to C. Haskett and D. Goodwin re revisions to fee application with respect to insurance matter (.1).	0.80	$944.00
06/15/26	Julia C. Philips Roth	Communicate with A. O'Brient, C. Haskett, D. Goodwin, and Foley team re interim fee applications	0.30	$354.00
06/18/26	Julia C. Philips Roth	Finalize (0.9) and coordinate filing (0.3) of second interim fee application	1.20	$1,416.00
06/29/26	Julia C. Philips Roth	Revise May monthly fee statement	0.30	$354.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**4.80**	**$5,664.00**
Total			**4.80**	**$5,664.00**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
O'Brient, Abigail V.	Partner	0.80	1,180.00	$	944.00
Philips Roth, Julia C.	Associate	4.00	1,180.00	$	4,720.00
Totals		**4.80**		$	**5,664.00**

Task Summary

Task Code	Description	Amount
L250	Other Written Motions & Submissions	$5,664.00

COVINGTON

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

Covington & Burling LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 6000

Matthew Kemner
General Counsel, Roman Catholic Diocese of Oakland
Roman Catholic Diocese of Oakland
2121 Harrison Street
Suite 100
Oakland, CA 94612

August 19, 2026

Invoice No.: 61199838
Account: 048691.00001

Roman Catholic Bishop of Oakland

Re: General Insurance Advice

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

Fees:	**$**	**121,774.50**
Disbursements:		
Lexis Research	$	20.86
Westlaw Research	$	75.66
Disbursements	**$**	**96.52**
Total Fees and Disbursements:	**$**	**121,871.02**
TOTAL AMOUNT DUE:	**$**	**121,871.02**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L120 - Analysis/Strategy				
07/01/26	Christine Saunders Haskett	Review and analyze strategy issues in connection with insurer's refusal to drop down (0.4); telephone and email with team re same (0.5); review and analyze insurer correspondence re payment of defense fees (0.5); draft declaration in connection with same and in preparation for fee arbitration (0.6); email with team re same (0.3).	2.30	$2,714.00
07/01/26	David Goodwin	Analyze issues regarding insurer dropdown obligations (1.10); comment on draft letter to Westport (.20); attend team meeting (.30).	1.60	$1,888.00
07/01/26	Harper A. Johnson	Attend to correspondence with team regarding defense cost reimbursement.	0.20	$236.00
07/02/26	David Goodwin	Emails regarding mediation privilege issues.	0.10	$118.00
07/06/26	Christine Saunders Haskett	Review and analyze materials in connection with insurers' arguments re independent mediation of underlying case.	1.00	$1,180.00
07/06/26	David Goodwin	Draft opposition to motions to dismiss (6.1); emails regarding insurance-related bankruptcy issues (.10).	6.20	$7,316.00
07/07/26	David Goodwin	Draft opposition to motions to dismiss (4.10); conference regarding arguments in motion to dismiss (.30).	4.40	$5,192.00
07/07/26	Sean M. Bender	Review supplemental reservation of rights letters from CNA and Westport.	0.50	$590.00
07/08/26	Christine Saunders Haskett	Review and respond to emails re correspondence with insurers re potential settlement of underlying case.	0.30	$354.00
07/08/26	David Goodwin	Draft opposition to motions to dismiss (6.50); revise draft letter from Ms. Ridley to insurers (.20); conference regarding opposition brief (.50).	7.20	$8,496.00
07/09/26	Christine Saunders Haskett	Participate in mediation of underlying case in connection with insurance strategy issues.	1.80	$2,124.00
07/09/26	Julia C. Philips Roth	Analyze bankruptcy case docket (0.4). Communicate with H. Johnson re same (0.3).	0.70	$826.00
07/10/26	Christine	Telephone and email with client re strategy in	0.40	$472.00

Date	Timekeeper	Description	Hours	Amount
	Saunders Haskett	connection with insurance coverage of defense costs.		
07/13/26	Christine Saunders Haskett	Email client re strategy issues in connection with defense of underlying cases and insurance coverage for same.	0.30	$354.00
07/15/26	David Goodwin	Draft analysis of insurance issues in proposed settlement scenarios.	0.60	$708.00
07/19/26	Christine Saunders Haskett	Email client re strategy issues in connection with insurers' failure to settle underlying claims.	0.20	$236.00
07/20/26	Sean M. Bender	Correspond with D. Goodwin and C. Haskett re meet and confer status.	0.30	$354.00
07/27/26	David Goodwin	Analyze issues regarding effect of California Supreme Court's Fox Paine decision on motions to dismiss.	0.20	$236.00
07/29/26	David Goodwin	Analyze insurers' reply brief to prepare for motion to dismiss hearing (1.50); conference regarding issues for motion to dismiss hearing (.50) .	2.00	$2,360.00
07/29/26	Sean M. Bender	Call with D. Goodwin and H. Johnson to discuss insurer's reply briefs.	0.60	$708.00
07/29/26	Harper A. Johnson	Review insurers' replies in support of their motions to dismiss, strike, and for a more definite pleading and confer with team regarding strategy for responding to such.	2.00	$2,360.00
07/31/26	Harper A. Johnson	Prepare responses to the insurers' replies in support of their motions to dismiss for upcoming hearing on said motions.	1.50	$1,770.00
Subtotal:	**L120 - Analysis/Strategy**		**34.40**	**$40,592.00**
L140 - Document/File Management				
07/10/26	Maryam Amini	Review Memorandum of Points and Authorities of Plaintiff Roman Catholic Bishop of Oakland in Opposition to the Insurers' Motions to Dismiss, Strike, and for a More Definite Statement, and prepare for filing per local rules.	0.10	$29.25
07/28/26	Maryam Amini	Review Statement of Recent Decision in Relation to the Insurers' Motions to Dismiss, Strike, and for a More Definite Statement, and prepare of filing per local rules.	0.10	$29.25
Subtotal:	**L140 - Document/File Management**		**0.20**	**$58.50**
L250 - Other Written Motions & Submissions				

Date	Timekeeper	Description	Hours	Amount
07/01/26	Christine Saunders Haskett	Telephone conference with team re oppositions to motions to dismiss.	0.30	$354.00
07/01/26	Sean M. Bender	Call with C. Haskett, D. Goodwin, and H. Johnson to discuss status of brief writing.	0.40	$472.00
07/01/26	Sean M. Bender	Continue drafting opposition to insurer motion to dismiss.	5.50	$6,490.00
07/01/26	Harper A. Johnson	Confer with case team on strategy.	0.30	$354.00
07/01/26	Harper A. Johnson	Prepare response to insurers' motions to dismiss, strike, and for a more definite statement.	0.70	$826.00
07/02/26	Christine Saunders Haskett	Review and analyze insurers' motions to dismiss in connection with preparation of opposition brief.	1.40	$1,652.00
07/05/26	Christine Saunders Haskett	Draft and revise opposition to motions to dismiss.	2.80	$3,304.00
07/05/26	Harper A. Johnson	Prepare opposition to the insurers' motions to dismiss.	4.50	$5,310.00
07/06/26	Christine Saunders Haskett	Review and analyze strategy issues and briefing in connection with opposition to insurers' motions to dismiss and strike (1.2); telephone conference with team re same (0.4).	1.60	$1,888.00
07/06/26	Harper A. Johnson	Prepare opposition to the insurers' motions to defend, to strike, and for a more definite statement.	2.10	$2,478.00
07/06/26	Harper A. Johnson	Including conferring with C. Haskett and D. Goodwin regarding same.	0.40	$472.00
07/07/26	Christine Saunders Haskett	Review and analyze insurer arguments in connection with draft opposition to motions to dismiss (3.5); telephone conference with team re same (0.4); revise draft opposition brief (1.6).	5.50	$6,490.00
07/07/26	Harper A. Johnson	Prepare opposition to the insurers' motions to dismiss.	1.30	$1,534.00
07/07/26	Harper A. Johnson	Confer with C. Haskett and D. Goodwin regarding such and incorporating edits from the team.	0.30	$354.00
07/08/26	Christine Saunders Haskett	Review and revise draft opposition to motions to dismiss and strike (3.8); conference with team re same (0.9); review and respond to emails from team re same (1.2).	5.90	$6,962.00

Date	Timekeeper	Description	Hours	Amount
07/08/26	Harper A. Johnson	Prepare opposition to the insurers' motions to dismiss, including incorporating edits from team.	5.20	$6,136.00
07/09/26	Christine Saunders Haskett	Email with co-counsel and team re draft response to insurers' motions to dismiss and strike.	1.10	$1,298.00
07/09/26	Christine Saunders Haskett	Conference with co-counsel and team re draft response to insurers' motions to dismiss and strike.	0.80	$944.00
07/09/26	David Goodwin	Draft opposition to motions to dismiss.	6.50	$7,670.00
07/09/26	Sean M. Bender	Review draft of opposition to insurer motion to dismiss.	0.50	$590.00
07/09/26	Harper A. Johnson	Prepare opposition to the insurers' motions to dismiss, including incorporating edits from team.	2.10	$2,478.00
07/09/26	Harper A. Johnson	Confer with D. Goodwin regarding insurers' motions to dismiss.	0.40	$472.00
07/09/26	Jeanette S. Mukta	Formatted and styled a Word document entitled "RCBO Combined Opposition to Motions to Dismiss" and generated a Table of Contents and Table of Authorities for David Goodwin.	0.40	$99.00
07/10/26	David Goodwin	Draft opposition to motions to dismiss.	2.60	$3,068.00
07/10/26	Harper A. Johnson	Confer with D. Goodwin regarding the insurers' motions to dismiss.	0.30	$354.00
07/10/26	Harper A. Johnson	Prepare and file opposition to the insurers' motions to dismiss, strike, and for a more definite statement.	4.70	$5,546.00
07/10/26	Jeaneth S. Decena	Proof and cite-check Combined Opposition to Motions to Dismiss.	4.40	$2,673.00
07/27/26	Christine Saunders Haskett	Review and analyze materials in preparation for hearing on insurers' motions to dismiss and strike.	1.20	$1,416.00
07/28/26	Christine Saunders Haskett	Review and respond to emails re submission of additional authority to court (0.4); review and analyze insurers' reply briefs and case law in preparation for hearing on motions to dismiss and strike.	1.50	$1,770.00
07/28/26	David Goodwin	Outline supplemental notice regarding Fox Paine decision (.20); emails regarding supplemental notice (.10).	0.30	$354.00
07/28/26	Harper A. Johnson	Prepare and file statement of recent decision regarding the California Supreme Court's Fox Paine decision and its impact on the insurers' motions to dismiss, strike, and for a more	1.20	$1,416.00

Date	Timekeeper	Description	Hours	Amount
		definite statement.		
07/29/26	Sean M. Bender	Review insurer reply briefing.	2.00	$2,360.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**68.20**	**$77,584.00**
L310 - Written Discovery				
07/01/26	Sean M. Bender	Correspond with insurers re discovery responses.	0.30	$354.00
07/01/26	Harper A. Johnson	Attend to correspondence regarding scheduling meet and confers with insurers regarding deficient discovery responses.	0.10	$118.00
07/02/26	Sean M. Bender	Correspond with H. Johnson re discovery disputes.	0.20	$236.00
07/14/26	Sean M. Bender	Draft and circulate summary of meet and confer call with Westport.	0.30	$354.00
07/14/26	Sean M. Bender	Prepare for and lead call with Lloyds regarding discovery deficiencies.	0.40	$472.00
07/14/26	Sean M. Bender	Prepare for and lead meet and confer call with Westport re discovery response deficiencies.	0.60	$708.00
07/14/26	Sean M. Bender	Draft summary of meet and confer call with Lloyds regarding discovery deficiencies.	0.30	$354.00
07/14/26	Harper A. Johnson	Attend meet and confer with Westport regarding deficient discovery responses.	0.40	$472.00
07/14/26	Harper A. Johnson	Attend meet and confer with LMI regarding deficient discovery responses.	0.40	$472.00
Subtotal:	**L310 - Written Discovery**		**3.00**	**$3,540.00**
Total			**105.80**	**$121,774.50**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
Haskett, Christine Saunders	Partner	28.40	1,180.00	$	33,512.00
Goodwin, David	Senior Counsel	31.70	1,180.00	$	37,406.00
Bender, Sean M.	Associate	11.90	1,180.00	$	14,042.00
Johnson, Harper A.	Associate	28.10	1,180.00	$	33,158.00
Philips Roth, Julia C.	Associate	0.70	1,180.00	$	826.00
Decena, Jeaneth S.	Paralegal	4.40	607.50	$	2,673.00
Amini, Maryam	Law Clerk	0.20	292.50	$	58.50
Mukta, Jeanette S.	Document Specialist	0.40	247.50	$	99.00
Totals		**105.80**		$	**121,774.50**

Task Summary

Task Code	Description	Amount
L310	Written Discovery	$3,540.00
L120	Analysis/Strategy	$40,592.00
L250	Other Written Motions & Submissions	$77,584.00
L140	Document/File Management	$58.50

Disbursement Summary

Description		Amount
Lexis Research	$	20.86
Westlaw Research	$	75.66
Totals	$	**96.52**

COVINGTON

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

Covington & Burling LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 6000

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

August 19, 2026

Invoice No.: 61198346
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 July 31, 2026:

Fees:	**$**	**2,006.00**
TOTAL AMOUNT DUE:	**$**	**2,006.00**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L120 - Analysis/Strategy				
07/29/26	Abigail V. O'Brient	Review and analyze fee examiner's report on Covington second interim fee application (.1); internal emails re response to same (.1).	0.20	$236.00
Subtotal:	**L120 - Analysis/Strategy**		**0.20**	**$236.00**
L250 - Other Written Motions & Submissions				
07/13/26	Julia C. Philips Roth	Coordinate filing of certificate of no objection to monthly fee statement	0.20	$236.00
07/29/26	Julia C. Philips Roth	Finalize (0.3) and coordinate filing of (0.1) monthly fee statement. Analyze (0.2) and communicate with A. O'Brient (0.1) re fee examiner letter.	0.70	$826.00
07/30/26	Julia C. Philips Roth	Communicate with C. Haskett re fee examiner letter (0.2). Draft partial response re same (0.4).	0.60	$708.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**1.50**	**$1,770.00**
Total			**1.70**	**$2,006.00**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
O'Brient, Abigail V.	Partner	0.20	1,180.00	$	236.00
Philips Roth, Julia C.	Associate	1.50	1,180.00	$	1,770.00
Totals		**1.70**		$	**2,006.00**

Task Summary

Task Code	Description	Amount
L120	Analysis/Strategy	$236.00
L250	Other Written Motions & Submissions	$1,770.00

COVINGTON

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

Covington & Burling LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 6000

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
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Covington & Burling LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
T +1 415 591 6000

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