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Special Insurance Counsel for the Debtor

UNITED STATES BANKRUPTCY COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re:

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

Debtor.

Case No.: 23-40523 WJL

Chapter 11

TWELFTH MONTHLY FEE STATEMENT OF COVINGTON & BURLING LLP, AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF SEPTEMBER 1, 2026 THROUGH SEPTEMBER 30, 2026

Judge: Hon. William J. Lafferty

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

[No Hearing Requested]

Name of Applicant:	Covington & Burling LLP
Authorized to Provide Professional Services to:	Debtor
Date of Retention:	Effective as of October 7, 2025 by Order entered November 12, 2025 [Dkt. No. 2450]
Period for Which Compensation and Reimbursement is Sought	September 1, 2026 – September 30, 2026
Amount of Compensation Sought as Actual, Reasonable and Necessary:	$60,860.00
20% Holdback	$12,172.00
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	$239.08
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought	$48,927.08

PRELIMINARY STATEMENT

On May 8, 2023, the Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO")[1] commenced the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case"). The Debtor continues to operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in this Chapter 11 Case.

On May 26, 2023, the Debtor filed the *Debtor's Motion for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 70] (the "Compensation Procedures Motion"). The Court granted the Compensation Procedures Motion on June 23, 2023, entering the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 170] (the "Original Compensation Procedures Order"). The Court entered its *Agreed Order Amending Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* on June 27, 2025 [Dkt. No 2101] (the "Amended Compensation Procedures

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

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

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

Covington & Burling LLP ("Covington" or "Applicant"), as special insurance counsel to the Debtor, hereby submits its twelfth monthly fee statement (the "Monthly Fee Statement") for allowance of payment of compensation for professional services rendered and for reimbursement of actual and necessary expenses incurred for the period commencing September 1, 2026 to and including September 30, 2026 (the "Fee Period") pursuant to the Compensation Procedures Orders.

By this Monthly Fee Statement, Covington seeks (i) a monthly interim allowance of compensation in the amount of $60,860.00 and actual and necessary expenses in the amount of $239.08 for a total allowance of $61,099.08, and (ii) payment of $48,688.00 (80% of the allowed fees pursuant to the Compensation Procedure Orders) and reimbursement of $239.08 (100% of the allowed expenses pursuant to the Compensation Procedures Orders) for a total payment of $48.927.08 for the Fee Period.

SERVICES RENDERED AND EXPENSES INCURRED DURING THE FEE PERIOD

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

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

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

Attached as **Exhibit 4** are the detailed time entries of Covington's professionals and paraprofessionals during the Fee Period.

NOTICE AND OBJECTION PROCEDURES

In accordance with the Compensation Procedures Orders, each Notice Party shall have until the tenth (10th) day (or the next business day, if such day is not a business day) following service of this Monthly Fee Statement (the "Objection Deadline") to serve an objection to the Monthly Fee Statement on Covington and each of the other Notice Parties.

Upon the expiration of the Objection Deadline, the Applicant shall file a certificate of no objection with the Court, after which the Debtor is authorized and directed to pay the Applicant an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement.

If an objection is properly filed, the Debtor shall be authorized and directed to pay the Applicant 80% of the fees and 100% of the expenses not subject to an objection.

DATED: 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

EXHIBIT 1

Compensation by Professional
September 1, 2026 – September 30, 2026

Name of Professional Individual	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Christine Saunders Haskett	Partner, 1997	$1,180.00	25.40	$29,972.00
Abigail V. O'Brient	Partner, 2009	$1,180.00	0.20	$236.00
David Goodwin	Senior Counsel, 1982	$1,180.00	15.50	$18,290.00
Julia C. Philips Roth	Associate, 2019	$1,180.00	1.00	$1,180.00
Sean M. Bender	Associate, 2021	$1,180.00	3.10	$3,658.00
Harper A. Johnson	Associate, 2025	$1,180.00	5.40	$6,372.00
Lauren M. Paterson	Paralegal, N/A	$360.00	3.20	$1,152.00
TOTAL			**53.80**	**$60,860.00**

EXHIBIT 2

Compensation by Category
September 1, 2026 – September 30, 2026

Category	Hours Billed this Fee Period	Total for Fee Statement
General Insurance Advice	52.80	$59,680.00
Fee and Employment Applications	1.00	$1,180.00
TOTAL	**53.80**	**$60,860.00**

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EXHIBIT 3

Expense by Category
September 1, 2026 – September 30, 2026

Costs/Expense	Amount Billed
Monthly Disk Storage	$18.20
Electronic Legal Research Services	$143.01
Local Transportation	$33.87
Parking	$44.00
TOTAL	**$239.08**

EXHIBIT 4

Time Entries

September 1, 2026 – September 30, 2026

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COVINGTON

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

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

October 21, 2026

Invoice No.: 61207531
Account: 048691.00001

Roman Catholic Bishop of Oakland

Re: General Insurance Advice

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

Fees:	**$**	**59,680.00**
Disbursements:		
Computer Research	$	97.80
Westlaw Research	$	45.21
Local Transportation	$	33.87
Parking	$	44.00
Monthly Disk Storage	$	18.20
Disbursements	**$**	**239.08**
Total Fees and Disbursements:	**$**	**59,919.08**
TOTAL AMOUNT DUE:	**$**	**59,919.08**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L120 - Analysis/Strategy				
09/03/26	David Goodwin	Emails regarding assignment of claims.	0.10	$118.00
09/04/26	Christine Saunders Haskett	Review draft letter to insurer re defense issues and email re same.	0.20	$236.00
09/04/26	David Goodwin	Revise draft letter from Ms. Ridley to CNA.	0.20	$236.00
09/04/26	Harper A. Johnson	Review correspondence from CNA and draft response from RCBO.	0.10	$118.00
09/05/26	Christine Saunders Haskett	Review and respond to emails re communications from insurers re defense of underlying matters.	0.40	$472.00
09/08/26	Christine Saunders Haskett	Review and respond to emails re proposed strategy for assigning insurance proceeds.	0.40	$472.00
09/09/26	Christine Saunders Haskett	Telephone conference with team re communications with insurers and strategy re missing policy information.	0.30	$354.00
09/09/26	David Goodwin	Attend team meeting (.20); emails with Mr. Kemner regarding duty to defend issues in bankruptcy court filing (.10); analyze insurance issues in Judge Lafferty's order (.10).	0.30	$354.00
09/09/26	Sean M. Bender	Call with C. Haskett et al to discuss tender letter.	0.30	$354.00
09/09/26	Sean M. Bender	Review Foley coverage correspondence (1.50); correspond with C. Haskett and D. Goodwin re same. (0.30)	1.60	$1,888.00
09/09/26	Harper A. Johnson	Attend team meeting to discuss case updates and ongoing action items.	0.40	$472.00
09/10/26	David Goodwin	Emails with insurers.	0.20	$236.00
09/10/26	Harper A. Johnson	Attention to correspondence from case team and co-counsel regarding updates from motion to dismiss hearing.	0.20	$236.00
09/11/26	Christine Saunders Haskett	Review and respond to emails re insurer communications.	0.40	$472.00
09/11/26	David Goodwin	Analyze Travelers' reservation of rights letter.	0.10	$118.00
09/11/26	Sean M. Bender	Review Travelers coverage position letters.	0.30	$354.00

Date	Timekeeper	Description	Hours	Amount
09/11/26	Harper A. Johnson	Attention to correspondence from co-counsel and opposing counsel regarding Waterworth action.	0.20	$236.00
09/14/26	Christine Saunders Haskett	Email re strategy issues in light of hearing (0.2); conference with team re same (0.2).	0.40	$472.00
09/14/26	David Goodwin	Telephone with Mr. Kemner regarding insurance action strategy issues (.40); conference regarding insurance bad faith claims (.10); emails regarding plaintiff insurance document demands (.10).	0.60	$708.00
09/14/26	Sean M. Bender	Correspond with C. Haskett re CNA coverage position.	0.20	$236.00
09/15/26	Christine Saunders Haskett	Review and respond to emails re strategy for asserting bad faith claims (0.5); telephone with client re same (0.3); review and respond to emails re insurer correspondence re continuous injury trigger (0.4).	1.20	$1,416.00
09/15/26	David Goodwin	Analyze insurance coverage issues raised in connection with the lift-stay cases.	0.50	$590.00
09/15/26	Harper A. Johnson	Analyze recent insurance coverage case law and prepare strategic summary of relevant holdings and implications for case strategy.	0.80	$944.00
09/16/26	Christine Saunders Haskett	Attend bankruptcy closing argument for input on insurance issues (4.2); telephone with client re same (0.1).	4.30	$5,074.00
09/16/26	David Goodwin	Comment on insurance issues in confirmation hearing presentations by insurance carriers.	0.40	$472.00
09/17/26	David Goodwin	Conference regarding insurance issues at confirmation hearing.	0.10	$118.00
09/22/26	Christine Saunders Haskett	Telephone conference with insurer counsel re plan for upcoming proceedings in coverage litigation.	0.60	$708.00
09/22/26	David Goodwin	Analyze insurer briefing on lift-stay order.	0.50	$590.00
09/23/26	Christine Saunders Haskett	Review and respond to emails re coverage and settlement strategy issues.	0.40	$472.00
09/23/26	David Goodwin	Outline responses to questions from Mr. Kemner.	0.10	$118.00
09/24/26	Christine Saunders Haskett	Telephone with CIGA counsel and co-counsel re stipulation re allegations (0.2); conference with team re strategy in connection with schools	0.40	$472.00

Date	Timekeeper	Description	Hours	Amount
		coverage issues (0.2).		
09/24/26	David Goodwin	Telephone with Mr. Kemner regarding plan-related insurance issues (.30); analyze and comment on draft letter to insurers regarding upcoming trial (.50); conference regarding duty to defend issues (.10).	0.90	$1,062.00
09/25/26	Christine Saunders Haskett	Email with co-counsel and insurer counsel re case schedule and case management issues.	0.70	$826.00
09/29/26	Christine Saunders Haskett	Email with insurer counsel re draft stipulation re case management and schedule.	0.50	$590.00
Subtotal:	**L120 - Analysis/Strategy**		**18.30**	**$21,594.00**
L230 - Court Mandated Conferences				
09/22/26	Sean M. Bender	Attend meet and confer with opposing counsel.	0.50	$590.00
Subtotal:	**L230 - Court Mandated Conferences**		**0.50**	**$590.00**
L250 - Other Written Motions & Submissions				
09/01/26	Christine Saunders Haskett	Review and revise draft supplemental brief on motions to dismiss (1.9); email with team re same (0.8); prepare for hearing on same (0.5).	3.20	$3,776.00
09/01/26	David Goodwin	Draft supplemental brief in opposition to motion to dismiss.	3.90	$4,602.00
09/01/26	Harper A. Johnson	Prepare supplemental briefing on California Supreme Court Fox Paine decision.	0.70	$826.00
09/02/26	Christine Saunders Haskett	Revise draft supplemental brief in connection with motions to dismiss (0.4); prepare for hearing on same (1.0).	1.40	$1,652.00
09/02/26	David Goodwin	Draft supplemental brief (1.90); prepare summary of responses to insurance issues raised in motion to dismiss (.40).	2.30	$2,714.00
09/02/26	Harper A. Johnson	Prepare supplemental briefing on California Supreme Court's Fox Paine decision for the insurers' motions to dismiss.	1.00	$1,180.00
09/02/26	Julia C. Philips Roth	Communicate with H. Johnson re motion to dismiss issues	0.20	$236.00
09/02/26	Lauren M. Paterson	Cite check The Roman Catholic Bishop of Oakland's Supplemental Brief Regarding Fox Paine per H. Johnson.	3.20	$1,152.00
09/03/26	David Goodwin	Revise draft supplemental brief.	0.90	$1,062.00

Date	Timekeeper	Description	Hours	Amount
09/03/26	Harper A. Johnson	Prepare and file supplemental briefing on California Supreme Court's Fox Paine decision in relation to the insurers' motions to dismiss.	1.60	$1,888.00
09/06/26	Christine Saunders Haskett	Prepare for hearing on motions to dismiss.	0.70	$826.00
09/07/26	Christine Saunders Haskett	Prepare for hearing on motions to dismiss.	2.00	$2,360.00
09/08/26	Christine Saunders Haskett	Prepare for hearing on motions to dismiss.	0.40	$472.00
09/08/26	David Goodwin	Prepare for motion to dismiss hearing.	0.90	$1,062.00
09/08/26	Sean M. Bender	Correspond with H. Johnson re motion to dismiss materials.	0.20	$236.00
09/08/26	Harper A. Johnson	Prepare materials for hearing on motion to dismiss.	0.40	$472.00
09/09/26	Christine Saunders Haskett	Prepare for hearing on motions to dismiss.	2.40	$2,832.00
09/09/26	David Goodwin	Prepare for hearing on motions to dismiss.	0.20	$236.00
09/10/26	Christine Saunders Haskett	Prepare for hearing on motions to dismiss (2.3); participate in same (2.0); email with client and team re same (0.5).	4.80	$5,664.00
09/10/26	David Goodwin	Attend hearing on motions to dismiss (3.10); emails regarding hearing (.10).	3.20	$3,776.00
09/17/26	Christine Saunders Haskett	Email client re court order on motions to dismiss.	0.30	$354.00
09/18/26	David Goodwin	Analyze motion to dismiss ruling.	0.10	$118.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**34.00**	**$37,496.00**
Total			**52.80**	**$59,680.00**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
Haskett, Christine Saunders	Partner	25.40	1,180.00	$	29,972.00
Goodwin, David	Senior Counsel	15.50	1,180.00	$	18,290.00
Bender, Sean M.	Associate	3.10	1,180.00	$	3,658.00
Johnson, Harper A.	Associate	5.40	1,180.00	$	6,372.00
Philips Roth, Julia C.	Associate	0.20	1,180.00	$	236.00
Paterson, Lauren M.	Paralegal	3.20	360.00	$	1,152.00
Totals		**52.80**		$	**59,680.00**

Task Summary

Task Code	Description	Amount
L250	Other Written Motions & Submissions	$37,496.00
L120	Analysis/Strategy	$21,594.00
L230	Court Mandated Conferences	$590.00

Disbursement Summary

Description		Amount
Monthly Disk Storage	$	18.20
Westlaw Research	$	45.21
Computer Research	$	97.80
Local Transportation	$	33.87
Parking	$	44.00
Totals	$	**239.08**

COVINGTON

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

October 21, 2026

Invoice No.: 61207529
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 September 30, 2026:

Fees:	**$**	**1,180.00**
TOTAL AMOUNT DUE:	**$**	**1,180.00**

Time Detail

Date	Timekeeper	Description	Hours	Amount
L250 - Other Written Motions & Submissions				
09/11/26	Julia C. Philips Roth	Coordinate filing of certificate of no objection to July monthly fee statement	0.10	$118.00
09/14/26	Abigail V. O'Brient	Email to Foley re failure to submit order on second interim fee application	0.20	$236.00
09/14/26	Julia C. Philips Roth	Communicate with Foley team and A. O'Brient re interim fee order	0.50	$590.00
09/29/26	Julia C. Philips Roth	Prepare August 2026 monthly fee statement	0.20	$236.00
Subtotal:	**L250 - Other Written Motions & Submissions**		**1.00**	**$1,180.00**
Total			**1.00**	**$1,180.00**

Timekeeper Summary

Timekeeper	Title	Hours	Rate		Amount
O'Brient, Abigail V.	Partner	0.20	1,180.00	$	236.00
Philips Roth, Julia C.	Associate	0.80	1,180.00	$	944.00
Totals		**1.00**		$	**1,180.00**

Task Summary

Task Code	Description	Amount
L250	Other Written Motions & Submissions	$1,180.00