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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 **COVER SHEET TO TENTH INTERIM FEE APPLICATION OF FOLEY & LARDNER LLP, AS GENERAL BANKRUPTCY COUNSEL TO THE DEBTOR, FOR ALLOWANCE AND PAYMENT 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. PST Place: United States Bankruptcy Court 1300 Clay Street Courtroom 220 Oakland, CA 94612 Objection Deadline: November 20, 2026

Name of Applicant:	**Foley & Lardner 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:[1]	$4,660,679.00
Total expenses sought this period:[2]	$202,745.90[3]
Petition date:	May 8, 2023
Retention date:	Effective as of May 8, 2023
Date of order approving employment:	June 15, 2023 [Docket No. 145]
Total fees approved by interim order to date:	$23,106,689.60[4]
Total expenses approved by interim order to date:	$650,748.16
Total allowed fees paid to date:	$25,353,829.30
Total allowed expenses paid to date:	$651,183.46
Blended rate in this application for all attorneys:	$1,029.76
Blended rate in this application for all timekeepers:	$983.64
Fees sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	$3,728,543.20
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	$202,745.90
Number of professionals included in this application:	30
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A

[1] Foley & Lardner LLP has agreed to not bill the Debtor *for the time* it takes its attorneys to travel to or from the Bay Area and such amounts are not included in this Interim Application.

[2] Foley & Lardner LLP has agreed to not bill the Debtor *for the expenses* for its attorneys to travel to or from the Bay Area (*e.g.*, airfare and ride share charges) in connection with this Bankruptcy Case, and such amounts are not included in this Interim Application. For the Interim Fee Period, the amount paid by Foley and not sought for reimbursement is $169,772.67.

[3] Certain of these expenses relate to the individual state court litigation matters that were incurred during the Interim Fee Period. The Debtor is seeking and expects to obtain reimbursement of these expenses from its insurer(s).

[4] This amount includes the fee reductions agreed to between Foley and the Office of the United States Trustee of $75,000.00 for Foley's First Interim Fee Application, and $28,000.00 for Foley's Second Interim Fee Application. This amount includes the fee reductions agreed to between Foley and the Fee Examiner of $20,355.50 for Foley's Third Interim Fee Application. This amount includes the fee reductions of $27,619.00 and expense reductions of $823.19 agreed to between Foley and the Fee Examiner for Foley's Fourth Interim Fee Application. This amount includes the fee reductions of $27,442.50 and the expense reductions of $2,330.80 agreed to between Foley and the Fee Examiner for Foley's Fifth Interim Fee Application. This amount includes the fee reductions of $17,691.65 agreed to between Foley and the Fee Examiner for Foley's Sixth Interim Fee Application. This amount includes the fee reductions of $21,500.00 and expense reductions of $138.66 agreed to between Foley and the Fee Examiner for Foley's Seventh Interim Fee Application. This amount includes the fee reductions of $14,250.00 and expense reductions of $296.64 agreed to between Foley and the Fee Examiner for Foley's Eighth Interim Fee Application. This amount includes the fee reductions of $40,577.50 and expense reductions of $36,941.90 agreed to between Foley and the Fee Examiner for Foley's Ninth Interim Fee Application.

If applicable, difference between fees budgeted and compensation sought for this period:	See Exhibit F
Number of professionals billing fewer than 15 hours to the case during this period:	9[5]
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation 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
06/30/26 (Dkt. No. 3312)	05/01/26–05/31/26	$1,006,857.60	$1,258,572.00	$106,068.38	$1,006,857.60	$106,068.38	$1,112,925.98
07/30/26 (Dkt. No. 3384)	06/01/26 – 06/30/26	$1,597,327.60	$1,996,659.50	$67,979.04	$1,597,327.60	$67,979.04	$1,665,306.64
08/31/26 (Dkt. No. 3474)	07/01/26–07/31/26	$596,771.20	$745,964.00	$19,125.71	$596,771.20	$19,125.71	$615,896.91
09/30/26 (Dkt. No. 3536)	08/01/26 – 08/31/26	$527,586.80	$659,483.50	$9,572.77	$527,586.80	$9,572.77	$537,159.57
Total		**$3,728,543.20**	**$4,660,679.00**	**$202,745.90**	**$3,728,543.20**	**$202,745.90**	**$3,931,289.10**

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Application and Not Yet Paid: **$932,135.80**

[5] Foley requests payment of fees for the timekeepers who billed fewer than 15 hours during the Interim Fee Period, because their expertise is unique and necessary for certain discrete issues in the case (*e.g.*, litigation, financing, corporate governance, insurance, and bankruptcy matters, as well as paraprofessionals who assist on as-needed basis), including several timekeepers who have spent significant time on this case during other fee application periods, or who are continuing their work on the case in future time periods.

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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

TENTH INTERIM FEE APPLICATION OF FOLEY & LARDNER LLP, AS GENERAL BANKRUPTCY COUNSEL TO THE DEBTOR, FOR ALLOWANCE AND PAYMENT 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. PST
Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

Objection Deadline: November 20, 2026

I. INTRODUCTION

Foley & Lardner LLP ("Foley" or the "Firm"), as general bankruptcy counsel to The Roman Catholic Bishop of Oakland, a California corporation sole and the debtor and debtor in possession (the "Debtor" or "RCBO"),[6] respectfully submits this tenth interim application for allowance of compensation and reimbursement of actual and necessary expenses (the "Interim Application") for services performed as general bankruptcy counsel to the Debtor for the period of May 1, 2026 through August 31, 2026 (the "Interim Fee Period") in the above-captioned Chapter 11 bankruptcy case (the "Bankruptcy Case").

Foley seeks interim approval of its fees incurred and reimbursement of expenses during the Interim Fee Period totaling **$4,863,424.90**. This sum represents compensation in the amount of **$4,660,679.00** for 4,738.20 hours worked by Foley's professionals for legal services provided to the Debtor in this matter, and reimbursement for expenses incurred in the amount of **$202,745.90.**[7] Foley has received a total of **$3,931,289.10** in payments for services during the Interim Fee Period, based on its monthly fee statements pursuant to the interim compensation procedures approved by the Court, and therefore now requests the balance of **$932,135.80** for the months covered in this Interim Application to be paid to the Firm.

This Interim Application is based upon the contents hereof, together with the exhibits, the declaration of Ann Marie Uetz filed concurrently herewith, the pleadings, papers, and records on file in this case, and any evidence or argument the Court may entertain at the time of the hearing on the Interim Application. This Interim Application is submitted considering 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 amount of fees charged and hours worked by each of the Firm's professionals and paraprofessionals during the Interim Fee Period are attached hereto as **Exhibit B** through **Exhibit F.**

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

[7] Certain of these expenses relate to individual state court litigation matters that occurred during the Interim Fee Period. The Debtor is seeking and expects to obtain reimbursement of these expenses from its insurer(s).

II. BACKGROUND

A. General Background

On May 8, 2023 (the "Petition Date"), the Debtor filed its voluntary Chapter 11 petition commencing the Bankruptcy Case. The Debtor continues to operate its ministry and manage its assets and properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee has been appointed in this Bankruptcy Case.

On May 23, 2023, the Office of the United States Trustee (the "US Trustee") filed its notice of appointment of an Official Committee of Unsecured Creditors (the "Committee") [Docket No. 58].

The Debtor is a corporation sole organized under the laws of the State of California. The Debtor conducts its civil affairs under the laws of the State of California and the United States of America and in accordance with the Code of Canon Law, the ecclesiastical law of the Roman Catholic Church. Additional information regarding the Debtor, its mission, ministries, and operations, and the events and circumstances preceding the Petition Date, is set forth in the *Declaration of Charles Moore, Managing Director of Alvarez & Marsal North America, LLC, Proposed Restructuring Advisor to the Roman Catholic Bishop of Oakland, in Support of Chapter 11 Petition and First Day Pleadings* [Docket No. 19], which is incorporated herein by reference.

B. Employment of Foley

On May 23, 2023, the Debtor filed the *Debtor's Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§ 327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Docket. No. 60] (the "Retention Application"). The Court approved the Retention Application on June 15, 2023, entering the *Order Approving Debtor's Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§ 327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Docket No. 145] (the "Foley Retention Order"). A copy of the Foley Retention Order is attached hereto as **Exhibit A**.

C. Summary of Case Status and Developments

During the Interim Fee Period covered by this Interim Application, the Debtor's efforts were continued to focus on its goal of confirming a Plan of Reorganization that (a) ensures a fair and equitable outcome for survivors of sexual abuse, and (b) allows the Debtor to stabilize its finances, continue its mission to serve the needs of the faithful within the Diocese of Oakland, and continue to provide services to underserved people and groups in the East Bay.

In furtherance of this goal, the Debtor's efforts during the Interim Fee Period were directed primarily to seeking confirmation of its *Debtor's Modified Fourth Amended Plan of Reorganization* [Docket No. 2758] (the "Fourth Amended Plan" or "Plan"), filed on March 29, 2026. While the Fourth Amended Plan was ultimately not confirmed by the Court, the Debtor believed it to provide fair and equitable treatment to Survivor, and to permit to the Debtor to continue its mission. Without any prospect of reaching a feasible compromise with the Committee, the Debtor determined that seeking confirmation of the Fourth Amended Plan, even over the Committee's objection, was necessary and in the best interests of the estate and all creditors and stakeholders.

Following the Committee's withdrawal of its competing plan of reorganization on April 24, 2026 [Docket No. 2854], the Fourth Amended Plan was the only proposed plan of reorganization pending before the Court. The Interim Fee Period was therefore dominated by the contested confirmation process for the Fourth Amended Plan, beginning with approval of the Debtor's Disclosure Statement on May 8, 2026, continuing through a two-week trial on plan confirmation in June 2026 (the "Confirmation Hearing"), and concluding with extensive post-trial briefing in August 2026. The Committee, the Office of the United States Trustee, and several of the Insurers each opposed confirmation.

While Foley's work during the Interim Fee Period was primarily focused on the plan confirmation process, including the Confirmation Hearing and post-trial briefing on the Fourth Amended Plan, it also included significant work on (1) ongoing state court litigation following the first trial under the Court's lift stay order, including the selection of further bellwether cases and related insurance coverage issues, and (2) continuing to pursue insurance coverage through the District Court insurance adversary proceeding

pending before Judge Corley (the "Insurance Coverage Litigation"). Each of these is addressed in more detail below.

1. The Plan Process

On May 1, 2026, the Debtor filed its *Notice of Filing of First Amended Disclosure Statement* in *Support* of *Debtor's Modified Fourth Amended Plan of Reorganization and Redline Thereof* [Docket No. 2880], with its proposed final disclosure statement for the Fourth Amended Plan (the "Disclosure Statement"). On the same day, the Debtor filed its proposed order approving the Disclosure Statement and providing solicitation and balloting procedures [Docket No. 2881], and its proposed revised forms of ballots and related forms of plan solicitation documents [Docket No. 2882]. On May 8, 2026, the Debtor filed the final solicitation version of its Disclosure Statement [Docket No. 2902].

On May 8, 2026, the Court entered its *Order (I) Approving* the *Debtor's Disclosure Statement and (II) Establishing Procedures for Solicitation*, *Notice and Balloting* for the *Plan* [Docket No. 2910] (the "Solicitation Order"), and the Fourth Amended Plan proceeded to a contested confirmation hearing beginning June 15, 2026 (the "Confirmation Hearing"), consistent with the Court's *Confirmation Scheduling Order* [Docket No. 2790]. The Debtor, through its claims and noticing agent, solicited votes from Holders of Class 1, Class 4, and Class 5 Claims, with a voting deadline of June 10, 2026. The Committee and the Office of the United States Trustee filed objections to confirmation on May 8, 2026 [Docket Nos. 2912, 2901], and various Insurers filed objections and joinders on and after May 13, 2026 [Docket Nos. 2942, 2946, 2951, 2958, 2961, 2979, 2985, 3034].

Following written discovery conducted primarily in April, 2026, intensive accelerated discovery continued in May 2026. This included expert reports, numerous fact and expert depositions, and continued supplemental written discovery.

On May 22, 2026, the Committee filed *The Official Committee of Unsecured Creditors' Motion to Designate Certain Class 1*, *Class 3, and Class 6 Votes* [Docket No. 3001] (the "Vote Designation Motion"), and on June 2, 2026, it filed an emergency motion to compel the production of documents in connection with that motion [Docket No. 3043]. Following negotiations, the Debtor and the Committee entered into a stipulation resolving both motions [Docket No. 3205], pursuant to which, among other

things, certain Class 3 and Class 6 claims were disallowed solely for voting purposes, the Committee agreed that Class 3 had voted to accept the Plan, adjudication of issues regarding the claim of RCC was adjourned, and both motions were withdrawn. The Debtor and the Committee also entered into a *Stipulation Regarding Plan Real Properties* [Docket No. 3173], identifying the real property the Debtor committed to make available for sale or as collateral to fund its post-Effective Date contributions to the Survivors' Trust.

With respect to voting, the Holders of Claims in Class 1 (the RCC secured claim) and Class 3 (general unsecured claims) voted to accept the Fourth Amended Plan, and Joshua Hogan, the Unknown Abuse Claims Representative, cast a ballot accepting the Fourth Amended Plan on behalf of Class 5 (unknown abuse claims). In Class 4 (abuse claims), eight claimants voted to accept and 331 voted to reject the Fourth Amended Plan. Accordingly, the Debtor sought confirmation of the Fourth Amended Plan under section 1129(b) of the Bankruptcy Code.

In advance of the Confirmation Hearing, on June 5, 2026, the Debtor filed its *Memorandum of Law in Support of Confirmation of Debtor's Modified Fourth Amended Plan* of *Reorganization* [Docket No. 3100], together with declarations in support of confirmation [Docket No. 3103]. The Debtor, the Committee, and the Insurers also filed numerous motions in limine and related pretrial motions, which the Court addressed at a final pretrial hearing on June 12, 2026 [Docket No. 3210]. The Confirmation Hearing was then conducted over seven court days from June 15 through June 29, 2026, during which the Court heard testimony from 15 witnesses. Foley presented the testimony of the Debtor's witnesses, including Bishop Michael C. Barber, Charles Moore, Daniel Flanagan, Attila Bardos, Dr. Andrew Currier, Ronald Gies, Joshua Hogan, Dr. Denise Martin, Adam Zimmerman, and John Satter. The Debtor also cross-examined the Committee's expert witnesses Randi Rosen, Paul Sheilds, and Kathryn McNally. Evidence closed on June 29, 2026, with the Court deferring closing statements pending further consideration.

On July 7, 2026, the Court convened a status conference regarding post-trial matters, at which the Court approved a schedule for post-trial briefing. On August 7, 2026, the Debtor filed its *Post-Trial Brief in Support of Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Docket No. 3418], and the Committee, London Market Insurers, Westport Insurance Corporation, and the Pacific

Insurers filed post-trial briefs in opposition to confirmation or joinders thereto [Docket Nos. 3414, 3415, 3416, 3417]. On August 19, 2026, the Debtor filed its replies to the Committee's post-trial brief [Docket No. 3452] and to the Insurers' post-trial briefs [Docket No. 3453], and the objecting parties filed their respective replies and responses [Docket Nos. 3450, 3451, 3455, 3456]. The preparation of the Debtor's post-trial briefing, which required a detailed review and synthesis of the entire trial record, accounted for a substantial portion of Foley's time during July and August 2026.

After the Interim Fee Period, closing arguments were presented on September 16, 2026, and the matter was submitted for decision. On October 2, 2026, the Court issued its *Memorandum Decision After Hearing on Confirmation of Debtor's Modified Fourth Amended Plan of Reorganization* [Docket No. 3548], as amended on October *15, 2026* [Docket No. 3567] (the "Memorandum Decision"), concluding that the Debtor had not satisfied its burden under section 1129(a)(7) of the Bankruptcy Code and that the Fourth Amended Plan therefore could not be confirmed. The Memorandum Decision also contained findings favorable to the Debtor, including that the Fourth Amended Plan was proposed in good faith, is feasible, and was accepted by two impaired classes. The Court reserved the Insurers' objections for a separate decision, which has not yet been issued. On October 16, 2026, the Debtor filed its *Debtor's Motion to Amend Findings and/or for Reconsideration of Specific Issues* [Docket No. 3569] (the "Motion for Amended Findings"), which has been taken off calendar pending mediation. The Motion for Amended Findings was targeted to address a limited number of specific issues in the record, but does not seek a change in the outcome of the Memorandum Decision.

While the Debtor was ultimately not successful in obtaining confirmation of its Fourth Amended Plan, the Debtor believed that it was necessary and in the best interests of Debtor, its estate, and its creditors to seek confirmation in light of the inability to reach consensual resolution or make meaningful progress in negotiations with the Committee. Further, even though confirmation was not successful, the rulings obtained in the memorandum decision substantially narrow the issues and the Debtor is hopeful may reframe negotiations such that further mediation can be productive

2. The State Court Litigation

As the Court is aware, the first case to proceed under the Court's order granting the Committee's *Renewed Motion of the Official Committee of Unsecured Creditors to Lift the Automatic Stay to Permit Certain Plaintiffs' Personal Injury Claims to Proceed in State Court* [Docket No. 2168] (the "Lift Stay Order") was tried in April 2026 and resulted in a jury verdict against the Debtor of $16 million. The total costs of defending that action, from entry of the Lift Stay Order through trial, exceeded $3 million. Travelers, as the insurer with primary coverage obligations for that action, agreed to reimburse defense costs subject to a reservation of rights, and has reimbursed approximately $849,000 based on the hourly rates it has agreed to pay, although a dispute remains regarding the appropriate reimbursement rates.

Following the trial and verdict, Judge Chatterjee, the presiding judge in the JCCP 5108 proceedings, determined to revisit the prior slate of cases and vacated the selections of the five remaining cases. On May 27, 2026, Judge Chatterjee ordered the parties to submit a total of ten proposed cases for selection as the next five bellwether trials, and the parties submitted their proposals on June 11, 2026. Following a case management conference on June 24, 2026, Judge Chatterjee issued an order dated July 1, 2026 selecting Case No. 22CV022633 (the "Action"), for trial beginning December 7, 2026, and selecting four additional cases for trial in November 2026 and January, February, and March 2027. Because the Debtor and certain Insurers raised concerns that the Action would not be "estate neutral," the order designated *E.M. v. The Roman Catholic Bishop of Oakland*, Case No. 22CV018558, as an alternate.

The Debtor's primary insurer for the period of the abuse alleged in the Action, Commercial Union, is insolvent. On July 1, 2026, Foley wrote to Westport Insurance Corporation, the Debtor's excess insurer, demanding that it acknowledge its obligation to drop down and provide first-dollar coverage, including reimbursement of defense costs. Westport declined on July 13, 2026. The Debtor then requested that the plaintiffs agree to substitute the E.M. case, and counsel for the plaintiff in the Action objected on July 17, 2026, contending that the Lift Stay Order does not contain an express "estate neutral" requirement. At a July 21, 2026 case management conference, Judge Chatterjee declined to issue further orders and suggested that the parties seek direction from this Court as to whether the selection complies with the Lift Stay Order.

After meeting and conferring with the plaintiff's counsel without resolution, on August 26, 2026, the Debtor filed its *Debtor's Motion* to *Clarify Lift Stay Order* [Docket No. 3462] (the "Motion to Clarify"), seeking an order clarifying that the Lift Stay Order requires that any case for which the stay is lifted be one for which an insurer is obligated to provide defense costs or, in the alternative, modifying the Lift Stay Order accordingly.

Prior to the hearing on the Motion to Clarify, the Debtor's Insurers finally provided confirmation in writing that they would participate in defense of the Action. This confirmation, which the Debtor has not obtained previously, led to the Court ultimately denying the Motion to Clarify as moot, without prejudice to the Debtor seeking further such relief if circumstances merit.

The Debtor also engaged in substantial post-trial work in connection with the prior verdict during the first part of the Interim Fee Period. In addition, the Debtor participated in a mediation with its Insurers and the Plaintiff in an effort to reach settlement. While those negotiations have not yet been successful, at least in part as a result of issues regarding coverage, discussions are ongoing.

Finally, in anticipation of the five trials scheduled for November through March, Foley's work during the Interim Fee Period also included work in preparation for trial on the matters selected to proceed to trial in November and December 2026.

3. The District Court Coverage Litigation

Since January 17, 2025, the Insurance Coverage Litigation pending before Judge Corley has been stayed except for written discovery. [Dist. Ct. Docket. Nos. 166, 146]. In her Order, Judge Corley directed the parties to "proceed to obtain all of the written discovery they believe is needed in this insurance coverage dispute." [Dist. Ct. Docket. No. 166]. The parties have since exchanged written discovery requests, made numerous document productions, and engaged in extensive meet and confer discussions regarding the parties' respective document productions.

For its part, the Debtor has made extensive document productions in response to the Insurers' document requests. In total, the Debtor has produced more than 58,000 documents to the insurers, many of which it produced notwithstanding its objections to the requests for certain of such documents on relevance and other grounds. For example, while preserving its objections on, *inter alia*, relevance

grounds to producing documents pertaining to abuse survivors for whose claims the Debtor is not seeking insurance coverage in the Insurance Case, the Debtor has produced many—estimated to be in the thousands—of documents pertaining to such claimants. The Insurers, in contrast, have produced in the realm of 10,000 documents between all insurer defendants combined.

During the Interim Fee Period, Foley attorneys continued to work on discovery matters and other case-related issues in the Insurance Coverage Litigation, as more fully described below.

In addition to ongoing discovery matters, on May 19, 2026, the Debtor filed its current, operative *Sixth Amended Complaint for Declaratory Judgment Relief, Breach of Statutory Duty, and Breach of the Implied Covenant of Good Faith and Fair Dealing* (the "Sixth Amended Complaint") in the Insurance Coverage Litigation. While much of the work in preparation of the Sixth Amended Complaint related to bad faith claims and was therefore performed by Covington as bad faith conflicts counsel, Foley supported this work while being mindful of avoiding duplication of services.

In response to the Sixth Amended Complaint, the Insurers filed multiple motions to dismiss. The Debtor opposed those motions, which were heard by the District Court on September 10, 2026. Following the hearing, the District Court issued an order on September 17, 2026, granting in part and denying in part the motions to dismiss. Substantively, the District Court dismissed bad faith claims without prejudice as not yet ripe, *except* as related to the first state court trial, and otherwise denied the motions. This order fully resolved pleading issues, allowing all remaining claims to move forward against the Insurers.

4. Other Motions and Filings in Furtherance of the Bankruptcy Case

While the primary areas of the Debtor's focus during the Interim Fee Period are described above, Foley also addressed numerous other matters during the Interim Fee Period, as briefly summarized below, and further described in the individual category narratives in the following section.

In light of the Court's prior denial of the Debtor's motion to amend the interim compensation procedures, the Debtor determined that its only viable option to remain current on its professional fee obligations was through debtor in possession financing from its pre-petition lender, The Roman Catholic Cemeteries of the Diocese of Oakland ("RCC"). On May 5, 2026, the Debtor filed its *Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing* the Debtor *to Obtain Postpetition Financing, (II)*

Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Docket No. 2885] (the "DIP Motion"), seeking approval of a $15 million DIP facility from RCC (the "DIP Loan"). The Court granted the DIP Motion through orders entered on an interim basis [Docket No. 2926] and then on a final basis on June 3, 2026 [Docket No. 3165] (the "DIP Financing Orders"). The DIP Loan is secured by liens on four properties that were previously unencumbered, as described in the DIP Financing Orders. While this provided the necessary liquidity to remain current on professional fee obligations through the Confirmation Hearing, the DIP Loan has now been exhausted.

On July 9, 2026, the Debtor filed its *Debtor's Fourth Motion for Order Approving Insurance Premium Finance and Security Agreement and Granting Post-Petition Security Interest* [Docket No. 3341], together with an application to shorten time, seeking approval of a new premium finance agreement with First Insurance Funding to finance approximately $4.57 million in premiums for the Debtor's property and liability program policies for the policy year commencing July 1, 2026. The relief requested was substantially the same as that approved by the Court in connection with the Debtor's prior renewals in July 2023, July 2024, and July 2025, and the motion was heard and granted on July 15, 2026.

In addition to the foregoing, it was necessary for the Debtor to address the following filings and other matters during the Interim Fee Period:

- The *Debtor's First Omnibus Objection to Certain Amended, Duplicated, and Late Filed Claims* [Docket No. 2783]. Following responses from creditors and meet and confer discussions regarding amended and duplicate claims, the Court entered an order sustaining the objections, subject to the agreements reached with certain creditors, on June 1, 2026 [Docket No. 3028].

- The *Omnibus Objection of the Official Committee of Unsecured Creditors to Amended, Duplicative, and Late-Filed Claims* [Docket No. 2829], objecting to certain late-filed, duplicative, or amended Class 3 and Class 6 claims. Subject to specific resolutions as to certain claims, as discussed on the record at a hearing on May 20, 2026, this motion was granted by order entered on May 26, 2026 [Docket No. 3006].

- Multiple objections filed by Certain Underwriters at Lloyd's, London to individual proofs for claim [Docket Nos. 3105-3145]. The Committee filed an emergency motion to stay hearing on these objections [Docket No. 3224] and the objections were ultimately taken off calendar.

- The ninth round of interim fee applications for estate professionals, covering the period from January 1, 2026 through April 30, 2026 were filed on or before June

16, 2026, and came before the Court for hearing on August 19, 2026, at which the applications were approved subject to certain agreed reductions [Docket No. 3503].

5. *Compliance with Bankruptcy Obligations*

Since the Petition Date, the Debtor has operated its business as a debtor in possession. During the Interim Fee Period, the Debtor timely filed all required *Monthly Operating Reports* [Docket Nos. 3277, 3370, 3457, and 3512] and two reports pursuant to Bankruptcy Rule 2015.3, (i) one regarding the value, operations, and profitability of Furrer Properties, Inc. ("Furrer") [Docket No. 3088], and (ii) one regarding the value, operations, and profitability of Roman Catholic Communications Corporations of the Bay Area dba Catholic Telemedia Network ("CTN"). [Docket No. 3442]. The Debtor has also paid all required quarterly fees to the US Trustee to date.

III. SERVICES RENDERED

In accordance with the *United States Bankruptcy Court 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 Rules"), Foley 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 different categories did not result in any duplication of work or billing. Further, given the size and complexity of this case, Foley submits that limiting each category to $20,000 is not practicable.

During the Interim Fee Period, there were instances where more than one attorney from Foley participated in meetings, hearings, or other matters. Sometimes, this participation was for less than the full meeting or hearing, for efficiency. In the Debtor and Foley's opinion, the complex nature of the case requires different attorneys within Foley to work on different work streams, each focused on particular issues and matters, but together contributing to the overall case strategy. As a result, Foley believes it was appropriate to keep multiple attorneys familiar with these matters in order to more efficiently render services and provide the most effective representation to the Debtor. In the Debtor and Foley's opinion, this did not lead to duplicative or unnecessary services for the Debtor.

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

001 – Administrative Expense Claims
002 – Asset Sales/ 363 Sales
003 – Automatic Stay
004 – Bankruptcy Litigation/Adversary Proceedings
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues
006 – Case Administration (Docket Updates, WIP and calendar)
007 – Chapter 11 Plan/Plan Confirmation
008 – Communications with Client
009 – Corporate Governance and Board Issues
010 – Vendor Issues
011 – Cash Management
012 – Disclosure Statement
013 – Employee Issues
014 – Exclusivity
015 – Executory Contracts/Lease Issues
016 – General Case Strategy (includes calls with client and team calls)
017 – Hearings and Courts Matters
018 – Non-Bankruptcy Litigation
019 – Reserved
020 – Retention/Billing/Fee Applications for Debtor Professionals
021 – Retention/Fee Applications: Ordinary Course Professionals
022 – Retention/Fee Applications: Other Professionals
023 – Schedules/Statement of Financial Affairs
024 – Tax Issues
025 – U.S. Trustee Issues/Meetings/Communications/Monthly Operating Report
026 – Unsecured Creditors Issues/Communications/Meetings
027 – Real Estate and Real Property Issues
028 – Tort Claims
029 – Non-Tort Proofs of Claim
030 – Insurance Issues (other than coverage)
031 – Insurance Issues (coverage)
032 – Rule 2004 Motions/Discovery/Subpoenas
033 – First Day Motion Practice
034 – Other Motion Practice
035 – General Counsel Matters
036 – Secured Creditor Matters
037 – Financing
038 – Mediation
039 – JCCP 5108 Litigation (Case No. HG19048685) – Claim No. 63
040 – JCCP 5108 Litigation (Case No. 22CV020490) – Claim No. 182
041 – JCCP 5108 Litigation (Case No. 22CV017382) – Claim No. 522
042 – JCCP 5108 Litigation (Case No. 22CV015222) – Claim No. 384

043 – JCCP 5108 Litigation (Case No. 22CV023118) – Claim No. 52
044 – JCCP 5108 Litigation (Case No. 22CV02733) – Claim No. 47
045 – Committee Plan Matters
046 – JCCP 5108 Litigation (Case No. 22CV023400) – Claim No. 230
047 – JCCP 5108 Litigation (Case No. 22CV022633) – Claim No. 76
048 – JCCP 5108 Litigation (Case No. 22CV020135) – Claim No. 172
049 – JCCP 5108 Litigation (Case No. 22CV020348) – Claim No. 144
050 – JCCP 5108 Litigation (Case No. 23CV030984) – Claim No. 552
051 – JCCP 5108 Litigation (Case No. 23CV030984) – Claim No. 552

Exhibit G includes Foley's invoices for the Interim Fee Period, which includes a detailed breakdown of the time entries and expenses incurred by task category.

Foley has agreed that it will not charge the Debtor for the travel time undertaken by its attorneys and other professionals. During the Interim Fee Period, Foley incurred, but did not charge the Debtor for 1,293.0 hours of travel time, totaling $144,980.00 in fees not charged to the Debtor.

A. Automatic Stay (003)

Total Hours 21.00 / Total Fees $20,638.00

During the Fee Period, Foley professionals addressed matters related to the automatic stay, including preparing for and attending the hearing on the Macias motion for relief from stay and corresponding with counsel for the movant following the hearing regarding the trustee claim objection and the Bar Date order. Foley also addressed the insurers' appeal of the lift stay order, analyzed a motion for relief from the automatic stay filed by a claimant seeking to file a state-court complaint, and strategized regarding claims that could be tried in state court in place of the five previously scheduled lift stay cases.

In August 2026, Foley's work in this category increased as Foley analyzed the lift stay cases pending in state court and issues relating to the requirement that the lift stay cases be "estate neutral," researched privileged issues, and responded to inquiries regarding bankruptcy issues raised by an insurers' proposal related to these matters. Foley drafted, revised, and finalized a motion to clarify the lift stay order, filed the motion together with supporting declarations and a notice of hearing, and analyzed issues relating to a supplement to the motion. Although this motion was denied as moot, it achieved the desired result in causing the Insurers to confirm in writing they would participate in defense of the pending lift stay cases.

B. Bankruptcy Litigation/Adversary Proceedings (004)

Total Hours 4.90 / Total Fees $2,958.00

During the Fee Period, Foley filed the joint status conference statement for the May 8, 2026, status conference, calendared deadlines arising from the order following the continued case management conference, and communicated regarding privileged discovery strategy and the collection of additional custodial files. Foley also reviewed documents from underlying claims in connection with privileged strategy matters, and calendared items related to pending litigation.

C. Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues (005)

Total Hours 55.90 / Total Fees $49,067.00

During the Fee Period, Foley professionals worked on claims reconciliation matters, principally in connection with the Debtor's first omnibus objection to amended, duplicate, and late-filed claims. In May 2026, Foley corresponded and conferred with counsel for various claimants regarding the objected-to claims, analyzed alleged duplicate claims and probate estate claims, prepared and filed stipulations with certain claimants resolving the objection as to their claims, met and conferred with Committee counsel and claims review experts, and prepared memoranda to file tracking the status of the objection on a claim-by-claim basis. Foley analyzed the responses filed in opposition to the objection, drafted and filed an omnibus reply in support of the objection, prepared for and attended the May 20, 2026 hearing, and completed post-hearing work on the proposed order granting the objection.

Foley also addressed requests by claimants to allow late-filed claims. Foley drafted the Debtor's opposition to Claimant 563's cross-motion to enlarge the bar date and supporting declaration, corresponded with counsel for Claimants 564 and 565 regarding allowance and voting issues, and analyzed issues relating to late-filed claimants seeking treatment as timely filed.

D. Case Administration (docket updates, WIP, and calendar) (006)

Total Hours 40.80 / Total Fees $17,353.00

During the Fee Period, Foley, among other things, worked on general case administration such as updating the daily docket report, calendaring hearings and objection deadlines, maintaining Foley's master case calendar and timeline, and preparing and filing notices of the core service list. Foley also filed a

periodic report regarding Furrer Properties, and stipulations. To be mindful of costs, Foley primarily staffed a paralegal on these matters.

E. Chapter 11 Plan/Plan Confirmation (007)

Total Hours 2,500.00 / Total Fees $2,506,308.50

During the Fee Period, Foley professionals worked extensively on matters related to confirmation of the Debtor's modified Fourth Amended Plan, which accounted for the largest portion of Foley's fees in the Fee Period. Foley's work in this category proceeded from solicitation and pre-trial discovery in May 2026, through the contested confirmation trial in June 2026, to post-trial briefing and preparation for closing arguments in July and August 2026.

Solicitation and Expert Reports (May 2026). In May 2026, Foley (i) finalized the solicitation documents, including the ballots, the solicitation order, the notice of filing of the solicitation documents, and the notice of the confirmation hearing, and revised those documents to address Committee comments; (ii) worked with the Debtor's expert witnesses at A&M, Hilco, and Dr. D. Martin of NERA, to finalize the amended and affirmative expert reports by the deadline in the scheduling order, including the A&M liquidation analysis and Hilco's real estate liquidation valuations; (iii) prepared an updated analysis of hypothetical litigation costs in a chapter 7 case for purposes of the liquidation analysis; (iv) analyzed the Committee's expert reports, including those of K. McNally and P. Shields, and worked with the Debtor's experts on rebuttal reports; (v) researched First Amendment and other constitutional and religious freedom issues bearing on confirmation; and (vi) negotiated with counsel for the Debtor's current insurer for non-abuse claims regarding language in the confirmation order addressing non-abuse insurance policies.

Pre-Trial Discovery and Trial Preparation (May 2026). Foley also engaged in extensive confirmation discovery, including preparing A. Bardos for and attending the insurers' Rule 30(b)(6) deposition, preparing and serving an amended Rule 30(b)(6) deposition notice to the Committee and subpoenas to Committee members, drafting and filing a motion to compel the depositions of Committee members and a motion to strike a late-filed pleading, and drafting the joint discovery letter to the Court and presenting oral argument on the discovery disputes. During the week of May 25, 2026, Foley prepared for and took the depositions of the Committee's experts K. McNally and P. Shields and prepared C. Moore

for, and defended, his expert deposition. Foley analyzed the objections to confirmation filed by the Committee and the insurers and the U.S. Trustee's reservation of rights, began drafting the confirmation brief and the pretrial order, began drafting motions in limine and Daubert motions, developed the trial plan, witness outlines, and trial themes, and participated in an informal logistics conference with the Court in advance of the trial.

Pre-Trial Filings (June 2026). In June 2026, Foley's work in this category increased significantly as the case proceeded to trial. Foley (i) prepared for and took the continued deposition of the Committee's corporate representative, and defended the depositions of experts D. Martin and K. Martens; (ii) finalized and filed three motions in limine and two Daubert motions directed to the testimony of P. Shields and K. McNally; (iii) prepared deposition designations, counter-designations, and objections to the designations of the Committee and the insurers; (iv) finalized and filed the confirmation brief, and declarations in support of confirmation, including those of C. Moore, A. Bardos, D. Martin, K. Martens, J. Hogan, R. Gies, and A. Currier, as well as related documents; (v) prepared the Debtor's exhibit list and met and conferred with the Committee and the insurers regarding a joint exhibit list and potential stipulations; (vi) negotiated stipulations with the Committee regarding resolution of the vote designation dispute and regarding plan real property collateral and sale designations; (vii) prepared responses to requests for admission served by the Committee and the insurers; (viii) prepared oppositions to the motions in limine of the Committee and the insurers, including the Committee's motion to exclude K. Martens' testimony, and objections to the declarations of K. McNally and R. Rosen; and (ix) revised the vote tabulation declaration and prepared an amended Verita declaration.

Confirmation Trial (June 2026). Foley prepared the Debtor's witnesses for trial testimony, including Bishop Barber, A. Bardos, C. Moore, D. Flanagan, D. Martin, J. Satter and A. Zimmerman of Hilco, R. Gies, A. Currier, and J. Hogan, and prepared direct and redirect examination outlines and witness binders. Foley prepared the Debtor's opening statement, prepared cross-examination outlines for P. Shields, K. McNally, and R. Rosen, and prepared the Debtor's response to the Committee's anticipated motion for directed verdict. During the trial days on June 15, 16, 22, 23, 24, 25, and 29, 2026, Foley conducted daily strategy meetings, prepared daily summaries of the trial for the client, managed trial

exhibits, and prepared binders of admitted exhibits. Time spent attending the trial days is reflected in Hearings and Court Matters (017).

Post-Trial Matters and Briefing (July 2026). In July 2026, Foley prepared and finalized the Debtor's exhibits, analyzed the official confirmation trial transcripts to identify errors and misidentified speakers, and coordinated with Committee counsel to prepare and file a joint notice of errata. Foley prepared for the July 7, 2026 status conference regarding post-trial briefing and met with the Committee and the insurers regarding the briefing schedule. Foley then outlined and drafted the Debtor's post-trial brief, which included collecting evidence and summaries of testimony from the trial record and researching, among other issues, the fair and equitable standard, the absolute priority rule in a non-profit context, the legislative history of section 1129 and the Bankruptcy Reform Act, judicial notice, U.S. Trustee fees after the effective date, and statements of counsel as admissions regarding the value of insurance policies. Foley also analyzed the insurers' redline of the plan and proposed plan modifications in response to these comments, and worked with the client on the post-trial briefings.

Post-Trial Briefs, Replies, and Closing Argument Preparation (August 2026). In August 2026, Foley incorporated client comments and the recent Baltimore Diocese decision into the post-trial brief, and finalized and filed the post-trial brief and appendix on August 7, 2026. Foley analyzed the post-trial briefs filed by the Committee and the insurers, and drafted and filed on August 19, 2026 the Debtor's reply briefs, including (i) a reply to the Committee addressing, among other things, constitutional, First Amendment, and religious freedom arguments, and (ii) a reply to the insurers addressing the insurance assignment, the plan's treatment of bad faith claims, and delayed discharge under section 1141. Foley also analyzed the reply briefs filed by the Committee and the insurers, prepared memoranda of anticipated questions for the closing arguments scheduled for September 16, 2026, and researched motions to stay pending appeal and potential case strategies depending on the Court's confirmation ruling.

F. Communications with Client (008)

Total Hours 52.70 / Total Fees $58,044.00

During the Fee Period, Foley maintained regular communications with the Debtor's leadership and finance team regarding case status, the confirmation trial, and other privileged matters. Foley

communicated with the client regarding the Committee's objection to the plan and the risks associated with it, the best interest of creditors test and potential modifications to plan terms, discovery and document collection in response to Committee requests, trial witnesses, real estate development efforts, RCC collateral for exit financing, CTN issues, interim DIP funding, and potential resolution of CIGA exposure. Foley also drafted privileged memoranda for client leadership regarding trial and confirmation issues, communicated regarding the closing brief, closing argument, and pending legislation, and communications with priests about restructuring developments, cash management, and the real estate matters.

G. Cash Management (011)

Total Hours 17.60 / Total Fees $19,420.00

During the Fee Period, Foley addressed matters relating to the Debtor's cash management, including (i) analyzing post-trial cash issues and updated cash forecasts and meeting with the finance team regarding the forecasts; (ii) preparing estimates of professional fees through case exit and following up with professionals regarding fees for budgeting purposes; (iii) preparing notices of CCCEB expense payments and funding requests; (iv) sending notices of church bank account openings and closings; (v) addressing cash management issues related to the Cathedral; and (vi) analyzing the Debtor's cash position, the DIP loan maturity, and projected budgets under different scenarios through the end of 2026.

H. Disclosure Statement (012)

Total Hours 30.40 / Total Fees $29,826.00

During the Fee Period, Foley revised and filed the Debtor's first amended disclosure statement in support of the modified fourth amended plan, the solicitation version of the disclosure statement, the notice of filing of the order approving the first amended disclosure statement, and revised forms of solicitation documents. Foley analyzed the LMI objection, the Committee's filings and proposed language for the solicitation order, and a late-filed supplemental objection following the disclosure statement hearing, and revised the disclosure statement based on the outcome of the hearing. Following approval, Foley addressed solicitation issues, reviewed the notice of non-voting status, confirmed solicitation to abuse claimants, and analyzed voting results. Foley also analyzed the Committee's motion to designate certain votes, addressed

voting for Classes 3, 4, and 5 through the June 10, 2026 voting deadline, reconciled final votes with Verita, organized supplemental voting declarations, and worked with the Committee on a stipulation to address voting issues and the designation motion.

I. General Case Strategy (includes teams calls) (016)

Total Hours 125.50 / Total Fees $125,826.50

During the Fee Period, Foley participated in team meetings and strategy sessions regarding case status, the confirmation hearing, trial themes, witness matters, evidence to be presented through each witness, motions in limine, courtroom security matters during the confirmation trial, and the outcome of the July 7, 2026 status conference. Foley also prepared regular summaries of docket activity and upcoming deadlines for the client and updates on the status of other pending diocesan cases, including the San Francisco settlement and the Camden case. In July and August 2026, Foley's work in this category included analyzing settlement strategy and alternative resolutions to the plan confirmation dispute, preparing for the mediation between the insurers and the plaintiff in the state court action and the impact of a potential settlement on bankruptcy case matters, researching the implications of good faith settlements by co-defendants under Proposition 51, analyzing the impact of an announced archdiocesan settlement on the plan confirmation analysis, and strategizing regarding options for staying the bankruptcy case if confirmation is denied. Strategy meetings and communications are captured in this task code, while specific tasks related to particular matters may be found in those codes.

J. Hearings and Court Matters (017)

Total Hours 572.60 / Total Fees $565,446.50

During the Fee Period, Foley prepared for and attended numerous hearings and court conferences, most significantly the contested confirmation trial in June 2026. In May 2026, Foley prepared for and attended the May 8, 2026 hearings on approval of the first amended disclosure statement and interim DIP financing, the May 18, 2026 conference with the Court regarding trial logistics, the May 20, 2026 hearing on the first omnibus claim objection and status conference, the May 21, 2026 hearing on the joint discovery letter, and a May 29, 2026 claim objection hearing.

In June 2026, Foley prepared for and attended the final hearing on DIP financing on June 3, 2026, the final pretrial conference on June 8, 2026 (including oral argument on the motion to strike the Pacific Insurers' objection), a trial technology test with court staff, and the June 12, 2026 hearing on the motions in limine and Daubert motions, at which Foley argued motions regarding limiting the insurers' role, limiting references to certain evidentiary matters, and the Shields Daubert motion. Foley then prepared for and participated in seven days of the contested confirmation trial on June 15, 16, 22, 23, 24, 25, and 29, 2026, during which Foley delivered the Debtor's opening statement, conducted the direct and redirect examination of C. Moore, presented the testimony of A. Bardos, J. Hogan, and other witnesses, cross-examined P. Shields, R. Rosen, and K. McNally, and opposed the Committee's motion for directed verdict.

Foley also prepared for and attended the July 7, 2026 status conference regarding post-trial briefing, the hearings on the motion of Claimant 563 to allow a late-filed claim (which also addressed Claimant 532), the August 5, 2026 hearing at which Foley confirmed a continuance of the late-filed claim motion, and the August 19, 2026 hearing addressing closing arguments, professional fee applications, and the motions to allow late-filed claims.

K. <u>Non-Bankruptcy Litigation (018)</u>

Total Hours 205.90 / Total Fees $226,924.00

During the Fee Period, Foley addressed matters in the JCCP 5108 coordinated proceedings before Judge Chatterjee, including the court-ordered selection of additional cases against the Debtor for bellwether trial setting. Foley analyzed cases involving accused parties, prepared court-ordered case summaries and proffers for the Debtor's proposed bellwether cases, analyzed the cases proposed by plaintiffs' liaison counsel, drafted and filed case management conference statements and confidential and redacted case selection submissions, and corresponded with plaintiffs' counsel and liaison counsel for the institutional defendants. Foley prepared for and attended the May 27, 2026 case management conference and order to show cause hearing involving the insurers, addressed the non-party insurers' motion to intervene, and attended the June 24, 2026 case management conference at which five cases were set for trial, after which Foley drafted and revised the proposed order setting the new cases for trial.

In July and August 2026, Foley participated in joint defense group calls regarding abuse case litigation in California, helped conduct a moot court for an appellate argument, prepared a litigation budget for the state court cases, addressed the substitution of a case set for trial in light of the insurer's coverage position, prepared for and attended the July 21, 2026 and August 26, 2026 case management conferences, analyzed proposed global settlements by co-defendants and anticipated good faith settlement motions, drafted a motion regarding substitution of the bellwether cases set for trial, and addressed the insurers' proposal to assume the defense of the state court actions.

L. Non-Working Travel (019)

Total Hours 12.00 / Total Fees $7,150.00

During the Fee Period, Foley billed non-working travel time for travel to and from New York for the continued deposition of the Committee's designated representative, and travel related to the state court action. This time is billed at 50%.

M. Retention/Billing/Fee Applications for Debtor Professionals (020)

Total Hours 79.50 / Total Fees $64,000.50

During the Fee Period, Foley prepared, reviewed, and filed its monthly fee statements for April, May, June, and July 2026 to ensure compliance with the U.S. Trustee guidelines, prepared and filed certificates of no objection for the monthly fee statements of Foley, A&M, NERA, and Verita, and reviewed and filed the monthly fee statements of NERA and Verita. Foley also prepared and filed its Ninth Interim Dee Application, coordinated the preparation and filing of the interim fee applications of A&M, NERA, and Hilco, and prepared and filed the notice of hearing on the interim fee applications. Foley also filed a stipulation and order continuing the hearing on the Interim Fee Applications, and prepared for the hearing on the Interim Fee Applications. Foley also provided updated fee information to the client team for financial modeling and budgeting.

N. Retention/Fee Applications: Other Professionals (022)

Total Hours 49.10 / Total Fees $39,614.00

During the Fee Period, Foley prepared an omnibus order approving fee applications, prepared overpayment letters for the mediators, coordinated with the mediators and other professionals regarding

the timing and filing of interim fee applications, finalized the fee applications for mediators Judge Newsome, T. Gallagher, and Judge Sontchi, and communicated with the client regarding payment of professional fee statements and amounts payable under the interim fee order. In August 2026, Foley analyzed the Committee's monthly fee statements and the Lowenstein June 2026 fee statement for excessive time, performed a detailed analysis of the June invoices against the trial transcripts and witness information, and drafted and finalized a limited objection to the Lowenstein June 2026 fee statement. Foley also researched issues related to fee application objections and prepared a stipulation and order to continue the hearing on the interim fee applications of all professionals.

O. U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Report (025)

Total Hours 9.20 / Total Fees $8,330.00

During the Fee Period, Foley reviewed and coordinated the filing and service of the Debtor's monthly operating reports for April, May, June, and July 2026, including the supplemental MOR information requested by the BRG team and a new reporting exhibit for DIP loan draws and accrued interest. Foley also coordinated the preparation, filing, and service of Rule 2015.3 reports for Furrer Properties and CTN, and reviewed the Q2 2026 quarterly U.S. Trustee fee calculation and OCP reporting prepared by VeraCruz. In order to minimize professional fee expenses, Foley's work on MORs and other reporting was largely limited to final review of the MORs and addressing specific questions and issues.

P. Unsecured Creditor Issues/Communications/Meetings (026)

Total Hours 14.50 / Total Fees $14,985.00

During the Fee Period, Foley communicated with Committee counsel regarding, among other things, the voting deadline for solicitation of the modified Fourth Amended Plan, possible stipulations relating to confirmation, the terms of the DIP facility, supplemental discovery requests, depositions of Committee experts and witnesses, the claim objections, the Committee's motion to compel discovery, the vote designation and property sales stipulations, witness order and evidentiary issues, post-trial briefing, and transcript issues. Foley also communicated with counsel for individual Class 4 claim holders regarding potential support for the plan and with J. Hogan regarding the Class 5 vote and his testimony at the confirmation hearing.

Q. Real Estate and Real Property Issues (027)

Total Hours 2.20 / Total Fees $2,205.00

During the Fee Period, Foley's work in this category included analyzing appraisals for certain properties and the sale orders in the case, communicating regarding buyer interest in church properties, and reviewing information relating to the development agreement with the City of Livermore and its possible impact on the timing of real estate sales.

R. Tort Claims (028)

Total Hours 39.40 / Total Fees $18,960.00

During the Fee Period, Foley updated information on these claims, researched and summarized cases proposed for trial, prepared fact sheets and proofs of claim for additional accused party cases under consideration for trial, and prepared timelines, summaries, and analyses for certain cases. Foley also prepared information responsive to the Committee's supplemental discovery requests, researched historical pre-bankruptcy abuse claim settlements, researched potential forensic psychology and psychiatry examination candidates for upcoming trials, prepared templates for the Debtor's responses to fact sheets and initial document demands, and set up a calendaring and docketing system for the cases set for trial.

S. Non-tort Claims (029)

Total Hours 1.60 / Total Fees $1,480.00

During the Fee Period, Foley's work in this category included analyzing non-tort proofs of claim and the prior Class 3 voting report.

T. Insurance Issues (other than coverage) (030)

Total Hours 13.30 / Total Fees $11,650.00

During the Fee Period, Foley addressed insurer requests to participate in Committee member depositions, a potential stipulation with certain insurers regarding authentication of insurance policies, LMI's requests for admission, and requested ratification of certain insurance policies in connection with confirmation. In July 2026, Foley prepared and filed the Debtor's fourth motion to approve an insurance

premium finance agreement for the new policy year, attended the hearing on the motion, and finalized and circulated the order approving the agreement.

U. Insurance Issues (coverage, incl. adversary proceeding) (031)

Total Hours 272.40 / Total Fees $295,224.50

During the Fee Period, Foley addressed a wide range of insurance-related matters, including discovery and motion to dismiss briefing related to the Debtor's amended pleading in the insurance coverage action, litigation of the state court cases and coordination with the insurers in connection therewith, and consultation on insurance-related matters in connection with plan confirmation, as summarized below.

a. Insurance Coverage Action

Foley's work in the insurance coverage action during the Fee Period focused on advancing discovery, revising the Debtor's sixth amended complaint, and opposing the insurers' motions to dismiss. Specifically, Foley (i) prepared and filed joint status reports; (ii) prepared for and attended the May 8, 2026 case management conference and discovery hearing, including court-mandated in-person meet and confer discussions with insurers' counsel, internal conferences, and review and preparation of materials in advance of the hearing; (iii) prepared responses and objections to insurers' requests for production, interrogatories, and requests for admission, and conferred with insurers regarding the same; (iv) revised the sixth amended complaint; (v) analyzed the insurers' motions to dismiss the sixth amended complaint, including conferring with the insurers regarding briefing and related supplemental authority, drafting the Debtor's opposition, and analyzing the insurers' replies; (vi) in connection with document production to the insurers, reviewed the insurers' requests for production, reviewed documents, prepared documents for production in response to the insurers' continuing requests, and prepared a supplemental redaction log; and (vii) conducted legal research on insurance coverage issues.

b. State Court Litigation and Relief from Stay Cases

During the Fee Period, Foley continued to monitor the state court litigation and to address the related insurance coverage and defense issues, as well as issues arising from the Bankruptcy Court's order granting relief from stay for certain cases to proceed to trial. In particular, Foley (i) monitored the

status of the state court cases and reviewed trial and settlement issues; (ii) prepared case management statements; (iii) reviewed insurance coverage for the state court cases proposed for relief from stay and analyzed the insurers' positions regarding the same; (iv) drafted and analyzed correspondence to and from the insurers regarding coverage obligations; (v) prepared and submitted defense reimbursement requests to the insurers for amounts expended during the state court trial and monitored insurer reimbursements; (vi) coordinated with the insurers regarding the defense and trial of the cases set for trial under the relief from stay order; (vii) reviewed the estate neutrality requirement for the cases selected for relief from stay; and (viii) analyzed the insurers' appeals of the order granting relief from stay and the related briefing.

c. State Court Trial and Post-Trial Matters

One state court case was tried to verdict shortly before the Fee Period. Foley's work following the verdict in that case included (i) conferring with the insurers regarding the verdict, post-trial and appellate issues, and the remittitur; (ii) reviewing and revising the motion for new trial; and (iii) corresponding with the insurers and conferring internally regarding post-trial mediation.

d. Plan Confirmation[8]

Foley consulted with and supported the Debtor's bankruptcy counsel on insurance-related aspects of plan confirmation, including the treatment of insurance in the plan and confirmation order and the presentation of insurance-related evidence at the confirmation trial. Specifically, Foley (i) analyzed and negotiated language in the confirmation order and plan related to insurance; (ii) prepared witnesses for the confirmation trial on insurance issues, including reviewing documents in connection with witness testimony; (iii) prepared other insurance-related evidence for the confirmation trial; (iv) monitored and assisted in the confirmation trial in connection with insurance issues; and (v) reviewed and advised on insurance issues in the post-trial confirmation briefing, including the impact of discharge on bad faith claims

[8] Additional time related to the insurance considerations of the Fourth Amended Plan is contained within task code 007,

V. Rule 2004 Motions/Discovery/Subpoenas (032)

Total Hours 135.90 / Total Fees $120,484.50

During the Fee Period, Foley engaged in extensive discovery in connection with confirmation. In May 2026, Foley prepared for and defended the Rule 30(b)(6) deposition of A. Bardos taken by certain insurers, met with A&M and Hilco regarding the liquidation and feasibility analyses, and produced the Debtor's expert reports and rebuttal expert reports. Foley analyzed the Committee's late-served discovery requests, drafted a motion for protective order, met and conferred with the Committee, negotiated a compromise, and prepared the Debtor's responses to the Committee's second set of discovery requests. Foley also addressed the insurers' requests for production of communications between the Debtor and the Committee, reviewed emails for supplemental productions, prepared the motion to compel depositions of Committee members and the joint discovery letter, drafted an opposition to the Committee's motion to compel, prepared for and took the deposition of R. Rosen, and began drafting a Daubert motion to exclude K. McNally's expert report.

In June 2026, Foley addressed the Committee's new motion to compel regarding vote designation issues and its resolution, met and conferred with the Committee regarding real property collateral, appraisals, and responses to the Committee's first set of written discovery, prepared supplemental interrogatory responses, filed a notice of withdrawal of the Debtor's motion to compel, analyzed the discovery motions filed by the Committee and the insurers, drafted an objection to the Committee's motion to exclude K. Martens' testimony and an omnibus response to the motions in limine, and finalized responses to 345 requests for admission regarding insurance coverage. In July and August 2026, Foley prepared supplemental MOR documents for production to the Committee, coordinated the scanning and loading of client insurance documents into the review platform, and coordinated the collection of additional records for cases set for trial.

W. Other Motion Practice (034)

Total Hours 13.10 / Total Fees $10,425.00

During the Fee Period, Foley prepared the notice of hearing on the DIP financing motion, prepared and filed a motion to strike the Pacific Insurers' supplemental objection to the disclosure statement, filed

the Debtor's combined response to *ex parte* applications and the motion to compel deposition testimony, prepared *pro hac vice* applications, strategized regarding motions in limine and Daubert motions, analyzed the Committee's motion to designate votes, and prepared an agreed order shortening time for the hearing on that motion.

X. Financing (037)

Total Hours 78.70 / Total Fees $76,280.00

During the Fee Period, Foley finalized the DIP term sheet with counsel for RCC, revised and filed the DIP financing motion, the declaration of A. Bardos in support, and an application to shorten time for the hearing, addressed the Committee's objection and proposed changes to the DIP term sheet and interim order, and finalized the proposed interim DIP order. Foley then prepared and negotiated the DIP credit agreement and the proposed final DIP order with the lender and the Committee, prepared a supplement to the DIP financing motion, attended the final hearing on DIP financing on June 3, 2026, and finalized the order approving the financing. Foley also addressed the real property collateral for the RCC exit facility, including meetings with the client, financial advisors, and RCC, and analyzed cash flows for payment of the exit facility. In August 2026, Foley reviewed the need for an extension of the DIP financing and prepared and finalized the DIP extension agreement.

Y. JCCP 5108 Litigation (Case No. HG19048685) – Claim No. 63 (039)

Total Hours 188.20 / Total Fees $185,724.00

During the Fee Period, Foley addressed post-trial matters following the verdict in this state court action. Foley revised the proposed judgment, prepared a client memorandum regarding post-trial and insurer-related issues and lessons learned from the trial, conferred with the insurers regarding potential post-trial motions and appellate issues, and addressed the plaintiff's memorandum of costs and the payment of other costs. Foley researched California authority regarding motions for new trial and conditional remittitur, drafted and filed the notice of intention to move for a new trial, and drafted, finalized, and filed the motion for new trial or, in the alternative, conditional remittitur, together with the supporting declarations, request for judicial notice, and proposed orders. Foley then analyzed the plaintiff's opposition, drafted and filed the reply brief in support of the motion after incorporating comments from

the insurers and bad faith counsel, analyzed the Court's tentative ruling, attended the July 14, 2026 hearing on the motion, and analyzed the order denying the motion. Foley also prepared for and attended the July 9, 2026 mediation between the insurers and the plaintiff regarding the judgment, analyzed the bankruptcy issues raised in the insurers' letters regarding the mediation, and, in August 2026, developed settlement strategy and communicated with the insurers regarding settlement negotiations.

Z. JCCP 5108 Litigation (Case No. 22CV020490) – Claim No. 182 (040)

Total Hours 2.00 / Total Fees $2,474.00

During the Fee Period, Foley's work in this category included strategizing regarding fact investigation for discovery responses, addressing document requests and a stay of the matter pending the case management conference, and coordinating with co-counsel regarding the status of the action.

AA. JCCP 5108 Litigation (Case No. 22CV017382) – Claim No. 522 (041)

Total Hours 0.40 / Total Fees $400.00

During the Fee Period, Foley's work in this category involved reviewing the status of the action, and upcoming schedule.

BB. JCCP 5108 Litigation (Case No. 22CV015222) – Claim No. 384 (042)

Total Hours 0.40 / Total Fees $400.00

During the Fee Period, Foley's work in this category involved strategizing regarding the status of the action, the discovery plan, and the trial schedule.

CC. JCCP 5108 Litigation (Case No. 22CV023118) – Claim No. 52 (043)

Total Hours 1.90 / Total Fees $2,372.50

During the Fee Period, Foley's work in this category included responding to counsel, strategizing regarding the status of document collection and fact investigation, reviewing the draft case management conference statement, strategizing regarding the status of the action, discovery plan, and trial schedule, and reviewing case updates.

DD. JCCP 5108 Litigation (Case No. 22CV02733) – Claim No. 47 (044)

Total Hours 1.00 / Total Fees $1,000.00

During the Fee Period, Foley's work in this category included strategizing regarding the status of document collection and fact investigation and regarding the status of the action, the discovery plan, and the trial schedule.

EE. JCCP 5108 Litigation (Case No. 22CV023400) – Claim No. 230 (046)

Total Hours 68.10 / Total Fees $60,985.00

During the Fee Period, following the setting of this action for trial, Foley began trial preparation and developed an offensive discovery strategy for the November trial. Foley drafted informal discovery correspondence to plaintiff's counsel requesting documents to be used at trial, conferred with plaintiff's counsel regarding case management and the discovery plan, drafted requests for production, requests for admission, and special interrogatories to the plaintiff, and drafted and revised the Debtor's fact sheet responses and responses and objections to requests for production. Foley also analyzed prior deposition testimony and documents pertaining to the alleged perpetrator, prepared the Debtor's document production, addressed a proposed stipulation regarding liability, analyzed the plaintiff's fact sheet, discovery responses, and document production, strategized regarding the defense of the action and the Court's pretrial order, evaluated potential expert witnesses, and began drafting a memorandum assessing liability.

FF. JCCP 5108 Litigation (Case No. 22CV022633) – Claim No. 76 (047)

Total Hours 19.60 / Total Fees $19,085.50

During the Fee Period, Foley compiled and summarized case documentation in preparation for trial, drafted informal discovery correspondence and requests for production and admission to the plaintiff, and strategized regarding the discovery plan and defense strategy. Foley also reviewed correspondence from Westport and CNA regarding coverage and the defense of the case, addressed the plaintiff's submission regarding the change of case in light of Westport's drop-down position, drafted a response for the case management conference to arguments regarding excess insurer coverage and objections to the proposed substitution of the case as a bellwether trial, and analyzed the plaintiff's allegations.

GG. JCCP 5108 Litigation (Case No. 22CV020135) – Claim No. 172 (048)

Total Hours 23.90 / Total Fees $21,465.00

During the Fee Period, Foley compiled and summarized case documentation in preparation for trial, analyzed prior discovery regarding the accused party, drafted informal discovery correspondence and requests for production to the plaintiff, drafted fact sheet responses and objections, corresponded with plaintiff's counsel regarding the exchange of documents, researched the plaintiff, and strategized regarding the defense of the action and privileged trial strategy.

HH. JCCP 5108 Litigation (Case No. 22CV020348) – Claim No. 144 (049)

Total Hours 24.70 / Total Fees $22,005.00

During the Fee Period, Foley compiled and summarized case documentation in preparation for trial, analyzed prior discovery and other information regarding the matter, drafted informal discovery correspondence and requests for production and admission to the plaintiff, drafted fact sheet responses and objections, corresponded with plaintiff's counsel regarding the exchange of documents, researched the plaintiff, and strategized regarding the defense of the action and privileged trial strategy.

II. JCCP 5108 Litigation (Case No. 23CV030984) – Claim No. 552 (050)

Total Hours 36.70 / Total Fees $31,687.50

During the Fee Period, Foley compiled and summarized case documentation in preparation for trial, analyzed prior discovery and related information regarding the allegations, drafted informal discovery correspondence and requests for production and admission to the plaintiff, drafted fact sheet responses and objections, and met and conferred with plaintiff's counsel regarding the exchange of documents and case status. Foley also researched the plaintiff, strategized regarding the plaintiff's intent to assert a punitive damages claim, and strategized regarding the defense of the action.

JJ. JCCP 5108 Litigation (Case No. 23CV030984) – Claim No. 552 (051)

Total Hours 23.10 / Total Fees $20,480.50

During the Fee Period, Foley compiled and summarized case documentation in preparation for trial, researched plaintiff's counsel in preparation for a potential motion to disqualify, drafted informal discovery correspondence and requests for production and admission to the plaintiff, drafted responses

and objections to requests for production and fact sheet responses, and prepared the Debtor's document production. In light of Westport's coverage position, Foley also analyzed coverage correspondence, drafted a joint stipulation substituting this action as the second bellwether trial, corresponded with plaintiffs' counsel regarding the substitution, strategized regarding the response to plaintiff's counsel's correspondence to the Court disputing the substitution and next steps for effectuating the substitution by motion, and corresponded with plaintiff's counsel regarding discovery.

IV. REIMBURSEMENT OF EXPENSES

A. List of Expenses by Category

Foley advanced costs, including certain in-house charges, in connection with the performance of the services described in this Interim Application. During the Interim Fee Period, Foley incurred and billed the Debtor a total of $202,745.90 in expenses. Additionally, as noted above, Foley agreed that it would not charge the Debtor for any travel expenses for its attorneys to travel to the Bay Area, including airfare, meals, and hotels. During the Interim Fee Period, Foley wrote off the sum of $169,772.67 for such travel expenses. Foley absorbed these costs itself. A summary chart detailing the type and amount of expenses incurred during the Interim Fee Period is attached hereto as **Exhibit E**.

Foley does not charge for photocopying expenses, print jobs, or scanned copies. However, it might sometimes be necessary for Foley to send large copying projects to an outside copy service that charges a reduced rate for photocopying. Foley also hosts a litigation support platform for the Debtor in relation to the previously-filed state court abuse litigation which is being utilized in this case also. Charges for hosting that platform are included in this application.

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

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 Foley's retention application and other documents, Foley's rates increase annually on February 1 of each year.

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 US 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 this Interim Application and the hearing thereon will be provided to the US Trustee, the Debtor, 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 Bankruptcy Rules 2002(a)(6) and 2002(c)(2). Additionally, this Interim Application is available from the claims and noticing agent, KCC, at no charge.

D. No Agreements to Share Compensation

Neither Foley, 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 Foley with any other person or attorney, except among members of the Firm.

E. Other Compliance with Large Case Requirements

Attached as **Exhibit B** through **Exhibit F** are the exhibits that Foley understands need to be completed and filed together with this Interim Application in order to comply with the Large Case

Guidelines. In addition, pursuant to paragraph C.5 of the Large Case Guidelines, Foley 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.	During this Chapter 11 Case, Foley has not billed for time or travel costs for its attorneys to travel to the Bay Area.
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?	Foley is discussing the estimated budget for professional fees—which fluctuates from time to time—with the Debtor and is monitoring the cash forecasts with the Debtor.
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the 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.	Yes, Foley attorneys billed 23.4 hours of time on these tasks during the Interim Fee Period, with fees of $21,281.50.
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, Foley attorneys billed zero hours of time on these tasks, with fees of $0.00.
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, as acknowledged in Foley's Retention Application, Foley's fees increase annually on February 1.

VI. BASIS FOR ALLOWANCE OF FEES AND EXPENSES

The fees and expenses requested by this Interim Application reflect reasonable compensation for services provided, and reimbursement of necessary expenses incurred, by Foley in acting as general bankruptcy counsel to the Debtor during the Interim Fee Period.

A. The Standard for Allowance of Compensation Pursuant to Section 330(a)

Pursuant to Section 330(a) 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. As set forth above, the fees for which the Firm requests compensation and the costs incurred for which the Firm requests reimbursement are for actual and necessary services rendered and costs incurred.

Section 330(a)(3) provides that in evaluating reasonable compensation, the court should consider the nature, extent, and value of the services provided, taking into account all relevant factors, including, (a) the time spent in providing such services; (b) the rates charged; (c) whether the services were necessary or beneficial to the estate at the time; (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the matter addressed; (e) whether the professional is certified or otherwise has demonstrated skill and experience in the bankruptcy field; and (f) whether the compensation sought is reasonable based on amounts charged by comparably skilled practitioners in non-bankruptcy cases. *See* 11 U.S.C. § 330(a)(3).

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). When determining the amount of reasonable compensation to be awarded, the court shall consider the nature, extent, and value of such services, taking into account all relevant factors, including the factors in Section 330(a)(3).

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 American Benefit Life Ins. Co. v. Baddock* (*In re First Colonial Corp. of America),* 544 F.2d 1291 (5th Cir. 1977) (*Johnson* criteria applicable in bankruptcy cases).

B. Foley's Work as Described in this Interim Application Satisfies the Requirements of Section 330, and the Request for Compensation Should Be Granted

The time for which compensation is sought is detailed in the Firm's invoices for the Interim Fee Period annexed hereto as **Exhibit G.** Foley's services and time expenditures are reasonable in light of the labor required and outcomes achieved to date in this Chapter 11 Case. The Firm's charges for its professional services are based upon the time, nature, extent, and value of such services and the cost of comparable services in the San Francisco area, other than in a case under the Bankruptcy Code. The compensation the Firm seeks by way of this Interim Application is the customary compensation commonly sought by the Firm and other professionals representing trustees, committees, and debtors in similar circumstances.

Foley believes the facts and complex nature of this case and the substantial case matters that occurred in this Interim Fee Period including, notably, (i) the preparation for the confirmation process for the Fourth Amended Plan including extensive written discovery and depositions of key witnesses; (ii) conducting the multi-day June 2026 contested confirmation hearing on the Fourth Amended Plan; (iii) preparing significant post-trial briefing after the conclusion of the Confirmation Hearing; (iv) pretrial work for multiple individual state court litigation claims, including a number that will be proceeding to trial in the next few months, and (v) continued the insurance coverage litigation with the Debtor's insurers.

Though Foley has utilized some professionals for fewer than 15 hours during the Interim Fee Period, Foley represents that the use of these professionals was efficient and appropriate under the circumstances because of their expertise needed for discrete issues, and in many cases, their prior work on this case.[9] These professionals often have particular expertise which Foley's bankruptcy attorneys can call upon to review matters quickly without the need for additional research and cost, and their fees should be approved. Foley has also used a number of paraprofessionals as needed for a variety of matters, including state court litigation.

C. The Estate Has Sufficient Assets

Foley is working with the Debtor to review its cash position and to determine its ability and timing to fund the payment of fees and costs requested herein. While the Debtor believes it will ultimately have funds sufficient to pay these fees and costs, it is uncertain regarding the timing for payment.

VII. CONCLUSION

Foley believes 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 incurred are fair and reasonable.

WHEREFORE, Foley respectfully requests the Court (a) authorize interim allowance and direct payment of fees and costs, (b) award interim compensation and reimbursement of expenses to the Firm in the amount of **$4,863,424.90** inclusive of all fees and costs for the period from May 1, 2026 through August 31, 2026, consisting of **$4,660,679.00** of fees, and **$202,745.90**[10] of expenses, and (c) grant such other and further relief as may be appropriate under the circumstances.

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[9] Foley requests payment of fees for the timekeepers who billed fewer than 15 hours during the Interim Fee Period, because their expertise is unique and necessary for certain discrete issues in the case (*e.g.*, financing, corporate governance, litigation, insurance, and bankruptcy matters, as well as paraprofessionals who assist on an as-needed basis), including timekeepers who have spent significant time on this case since its filing in May 2023 or who will be continuing to work on the case in future time periods.

[10] Certain these expenses relate to individual state court matters that occurred during the Interim Fee Period. The Debtor is seeking and expects to obtain reimbursement of these expenses from its insurer(s).

DATED: October 30, 2026

FOLEY & LARDNER LLP
Eileen R. Ridley
Shane J. Moses
Ann Marie Uetz
Matthew D. Lee
Geoffrey S. Goodman
Mark C. Moore

/s/ Shane J. Moses
SHANE J. MOSES

Counsel for the Debtor
and Debtor in Possession

EXHIBIT A

FOLEY RETENTION ORDER

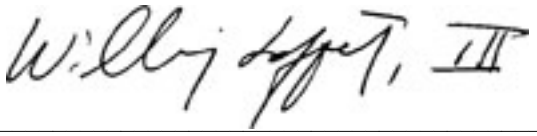
Entered on Docket
June 15, 2023
EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

Docket #0145 Date Filed: 6/15/2023

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San Francisco, CA 94104-1520

Proposed Counsel for the Debtor and Debtor in Possession

The following constitutes the order of the Court.
Signed: June 15, 2023



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 FOLEY & LARDNER LLP AS GENERAL BANKRUPTCY COUNSEL PURSUANT TO 11 U.S.C. §§ 327(A), 330, 331 & 1107, AND RULES 2014 & 2016 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Upon the application (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), 330, 331, and 1107 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016, for entry of an order authorizing the employment and retention of Foley & Lardner LLP ("Foley") to represent the Debtor as general bankruptcy counsel in the above-captioned case, on the terms described in the Application and as more fully set forth therein; and upon the Declaration of Ann Marie Uetz (the "Uetz

[1] Capitalized terms not defined herein shall have the meanings

Case: 23-40523 Doc# 145 Filed: 06/15/23 Entered: 06/15/23 Page 1 of 5
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4883-8374-5631

Declaration") and all other submissions filed in support of the Application; 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 Uetz Declaration that Foley 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, and for authorizing the employment of Foley & Lardner LLP as counsel for the Debtor effective as of the Petition Date, including that such employment as of the Petition Date 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 Foley as its general bankruptcy counsel in this case, effective as of the Petition Date, under the terms set forth in the Application.

3. Foley'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 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 Foley'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. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable immediately upon its entry.

7. The Debtor is authorized and empowered to take all action necessary to effectuate the relief granted in this Order.

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

APPROVED AS TO FORM:

OFFICE OF THE UNITED STATES TRUSTEE

By: */s/ Jason Blumberg*
Jason Blumberg
Trial Attorney

*** 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[11]	$839	$1,147.56
Associate[12]	$516	$803.82
Paralegal[13]	$287	$444.04
All timekeepers aggregated	$611	$983.62

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

[11] Partner category includes Of Counsel.

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

[13] Paralegal category includes Other.

EXHIBIT C

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS INTERIM FEE APPLICATION

Name of Professional Individual	Initials	Department, Group or Section	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Eloise R. Asfora	ERAS	Litigation	Associate, 2024	$650	3.10	$2,015.00
Emma E. Soldon	EES	Litigation	Associate, 2022	$775	16.30	$12,632.50
Jack R. Doti	JRDO	Litigation	Associate, 2023	$675	104.60	$70,605.00
Jack R. Doti	JRDO	Litigation	Associate, 2023	$337.50[14]	4.00	$1,350.00
Mary Rofaeil	MRL	Bankruptcy	Associate, 2021	$800	494.40	$395,520.00
Mason Roberts	MR	Litigation	Associate, 2018	$850	115.80	$98,430.00
Michael H. Holland	MHH	Litigation	Associate, 2022	$750	5.50	$4,125.00
Nathan C. Walsh	NCW	Bankruptcy	Associate, 2024	$650	86.50	$56,225.00
Nora J. McGuffey	NMCG	Bankruptcy	Associate, 2020	$825	517.50	$426,937.50
Shane J. Moses	SJM	Bankruptcy	Of Counsel, 2005	$925	496.80	$459,540.00
Jack Dorr	JDOR	Research	Other, N/A	$300	14.90	$4,470.00
Sophie Le	SL	Research	Other, N/A	$300	1.10	$330.00
Janelle C. Harrison	JCH	Bankruptcy	Paralegal, N/A	$420	117.70	$49,434.00
Jesus Torres	JT	Litigation	Paralegal, N/A	$460	123.20	$56,672.00
Kathleen M. Farrelly	KMF		Paralegal, N/A	$345	7.50	$2,587.50
Kerry A. Farrar	KAFA	Litigation	Paralegal, N/A	$480	95.10	$45,648.00
Wendy DelValle	WD	Litigation	Paralegal, N/A	$480	13.60	$6,528.00
Alan R. Oulette	AROU	Litigation	Partner, 2010	$1,000	270.40	$270,400.00
Ann Marie Uetz	AMUE	Bankruptcy	Partner, 1993	$1,225	532.50	$652,312.50
David B. Goroff	DBG	Bankruptcy	Partner, 1985	$1,450	429.00	$622,050.00
David B. Goroff	DBG	Bankruptcy	Partner, 1985	$725.00[15]	8.00	$5,800.00

[14] The time billed at this rate is related to non-working travel, which is billed at 50% of a timekeeper's normal billing rate.

[15] The time billed at this rate is related to non-working travel, which is billed at 50% of a timekeeper's normal billing rate.

Name of Professional Individual	Initials	Department, Group or Section	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Eileen R. Ridley	EPK	Litigation	Partner, 1990	$1,250	248.50	$310,625.00
Emil P. Khatchatourian	ERR	Bankruptcy	Partner, 2009	$1,000	8.90	$8,900.00
Geoffrey S. Goodman	GSG	Bankruptcy	Partner, 1999	$1,175	0.40	$235.00
Jeff R. Blease	JRBL	Litigation	Partner, 1998	$1,575	29.50	$46,462.50
Mark C. Moore	MCM	Bankruptcy	Partner, 2010	$1,050	543.70	$570,885.00
Matthew D. Lee	MDL	Bankruptcy	Partner, 2006	$1,000	217.70	$217,700.00
Thomas F. Carlucci	TFCA	Litigation	Partner, 1987	$1,525	83.50	$127,337.50
Elizabeth P. Mazzocco	EPM	Litigation	Senior Counsel, 2014	$950	51.70	$49,115.00
Jake W. Gordon	JWGO	Finance	Senior Counsel, 2017	$950	8.90	$8,455.00
Tamar N. Dolcourt	TND	Bankruptcy	Special Counsel, 2009	$880	87.90	$77,352.00
TOTAL					**4,738.20**	**$4,660,679.00**

Case Name: The Roman Catholic Bishop of Oakland
Case Number: 23-bk-40523
Applicant's Name: Foley & Lardner 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 Amount This Fee Period
003 – Automatic Stay	21.00	$20,638.00
004 – Bankruptcy Litigation/Adversary Proceedings	4.90	$2,958.00
005 – Bar Date Motion/Claims Reconciliation/Claims Reconciliation Issues	55.90	$49,067.00
006 – Case Administration (Docket Updates, WIP and calendar)	40.80	$17,353.00
007 – Chapter 11 Plan/Plan Confirmation	2,500.00	$2,506,308.50
008 – Communications with Client	52.70	$58,044.00
011 – Cash Management	17.60	$19,420.00
012 – Disclosure Statement	30.40	$29,826.00
016 – General Case Strategy (includes calls with client and team calls)	125.50	$125,826.50
017 – Hearings and Courts Matters	572.60	$565,446.50
018 – Non-Bankruptcy Litigation	205.90	$226,924.00
019 – Non-Working Travel	12.00	$7,150.00
020 – Retention/Billing/Fee Applications for Debtor Professionals	79.50	$64,000.50
022 – Retention/Fee Applications: Other Professionals	49.10	$39,614.00
025 – U.S. Trustee Issues/Meetings/Communications/Monthly Operating Report	9.20	$8,330.00
026 – Unsecured Creditors Issues/Communications/Meetings	14.50	$14,985.00
027 – Real Estate and Real Property Issues	2.20	$2,205.00
028 – Tort Claims	39.40	$18,960.00
029 – Non-tort Proofs of Claim	1.60	$1,480.00
030 – Insurance Issues (other than coverage)	13.30	$11,650.00
031 – Insurance Issues (coverage)	272.40	$295,224.50
032 – Rule 2004 Motions/Discovery/Subpoenas	135.90	$120,484.50
034 – Other Motion Practice	13.10	$10,425.00
037 – Financing	78.70	$76,280.00
039 – JCCP 5108 Litigation (Case No. HG19048685) – Claim No. 63	188.20	$185,724.00
040 – JCCP 5108 Litigation (Case No. 22CV020490) – Claim No. 182	2.00	$2,474.00
041 – JCCP 5108 Litigation (Case No. 22CV017382) – Claim No. 522	0.40	$400.00
042 – JCCP 5108 Litigation (Case No. 22CV015222) – Claim No. 384	0.40	$400.00
043 – JCCP 5108 Litigation (Case No. 22CV023118) – Claim No. 52	1.90	$2,372.50
044 – JCCP 5108 Litigation (Case No. 22CV02733) – Claim No. 47	1.00	$1,000.00
046 – JCCP 5108 Litigation (Case No. 22CV023400) – Claim No. 230	68.10	$60,985.00
047 – JCCP 5108 Litigation (Case No. 22CV022633) – Claim No. 76	19.60	$19,085.50
048 – JCCP 5108 Litigation (Case No. 22CV020135) – Claim No. 172	23.90	$21,465.00
049 – JCCP 5108 Litigation (Case No. 22CV020348) – Claim No. 144	24.70	$22,005.00
050 – JCCP 5108 Litigation (Case No. 23CV030984) – Claim No. 552	36.70	$31,687.50
051 – JCCP 5108 Litigation (Case No. 23CV030984) – Claim No. 552	23.10	$20,480.50
TOTAL	**4,738.20**	**$4,660,679.00**

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

EXHIBIT E

SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY[16]

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

Costs/Expense	Amount Billed
Depositions, Transcripts, Exams	$56,564.87
Electronic Legal Research Services	$2,665.67
LSS – eDiscovery Services	$56,800.00
Mailing Expense	$1,371.92
Meals	$6,304.60
Other Expenses	$53,359.43
Other Fees	$821.00
Photocopying Charges	$166.72
Recording / Filing Fees	$3,251.82
Service Fees	$217.58
Shipping Charges	$466.27
Shipping/Courier/Messenger Services	$252.01
Transcripts	$5,722.20
Transportation / Travel Expenses	$14,781.81
TOTAL	**$202,745.90**

[16] Certain of these expenses relate to state court litigation matters that occurred during the Interim Fee Period. The Debtor is seeking and expects to obtain reimbursement of these expenses from its insurer(s).

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

EXHIBIT F

FOLEY BUDGET AND STAFFING PLAN

The Foley attorneys and paraprofessionals staffed on this case, subject to modification depending on case developments, are set forth in (1) the Declaration of Ann Marie Uetz in Support of Debtor's Application to Employ Foley & Lardner LLP as General Bankruptcy 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. Before the Petition Date, Foley estimated the approximate cost per month of its services and expenses for the Bankruptcy Case with certain months being higher and certain months being lower in amount, and also provided an estimate for all services and expenses in the case assuming a certain duration for the case, and the Debtor approved that estimate. While the costs of the professional fees overall in this case have increased beyond what was originally estimated, Foley has communicated with the Debtor regarding fees throughout the Interim Fee Period and has worked with the Debtor continuously to help manage its cash position. Notably, approximately two-thirds of the fees charged to the Debtor during the Interim Fee Period were incurred for the confirmation process for the Fourth Amended Plan, including both preparations for the trial in May and early June 2026, the trial itself in mid-late June 2026, and post-trial briefing in July and August 2026. Additionally, during the Interim Fee Period, Foley billed approximately $368,000 for individual state court litigation matters, and is working with the Debtor to obtain reimbursement from the Debtor's insurers for these expenses. During the Interim Fee Period, the Debtor received a reimbursement from one of its insurers in the amount of $849,809.90 for the state court litigation and trial which was incurred in prior fee periods.

EXHIBIT G

FOLEY INVOICES

FOLEY & LARDNER LLP

FOLEY & LARDNER LLP
111 HUNTINGTON AVENUE
SUITE 2600
BOSTON, MASSACHUSETTS 02199-7610
TELEPHONE (617) 342-4000
FACSIMILE (617) 342-4001
WWW.FOLEY.COM

Roman Catholic Bishop of Oakland
Attn: Attila Bardos
Chief Financial Officer
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: June 30, 2026
Invoice No.: 51327528
Our Ref. No.: 100845-0402

Services through May 31, 2026

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	$1,258,572.00
Total Expenses:	$106,068.38
Amount Due:	**$1,364,640.38**

Please reference your invoice number 51327528 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of our invoice.

Federal Employer Number: 39-0473800

Professional Services Detail

003 Automatic Stay

05/06/26	SJM	Prepare for hearing on Macias motion for relief from stay (.2); attend hearing (.4); call with L. Katz (counsel for Macias) following hearing (.2); emails to L. Katz regarding trustee claim objection and bar date order (.3).	1.10	$1,017.50
05/07/26	SJM	Email to case team regarding insurer appeal of lift stay order.	0.20	$185.00
05/13/26	MCM	Review motion for relief from automatic stay filed by Claimant RG to allow him to file state-court complaint.	0.40	$420.00
05/13/26	MDL	Strategize with M. Moore regarding possible response to R. Simons' motion to lift automatic stay.	0.10	$100.00
05/13/26	MRL	Analyze the motion for relief from stay.	0.30	$240.00
05/19/26	SJM	Analyze issue related to selection of lift stay cases for trial.	0.20	$185.00
05/20/26	MDL	Strategize with Foley team regarding possible claims to be tried in state court in place of previously scheduled five lift stay cases.	0.50	$500.00
05/20/26	SJM	Confer with T. Carlucci and E. Ridley regarding relief from stay cases and related issues.	0.60	$555.00
		Task Total:	3.40	$3,202.50

004 Bankruptcy Litigation/Adversary Proceedings

05/01/26	JCH	File joint status conference statement for May 8, 2026 status conference.	0.20	$84.00
05/07/26	MR	Email communications with A. Uetz regarding privileged discovery strategy matters in chapter 11 proceedings.	0.10	$85.00
05/11/26	MR	Communicate with D. DiFrancesco regarding collection of additional custodial files, in connection with discovery in chapter 11 proceedings.	0.20	$170.00

05/12/26	JCH	Calendar multiple deadlines from Order following May 8, 2026 further continued case management conference.	0.50	$210.00
05/19/26	SL	Locate and provide expert background and information per N. McGuffey.	1.10	$330.00
05/22/26	MR	Telephone communication with A. Uetz regarding privileged strategy matters relating to fourth amended plan in chapter 11 proceedings.	0.20	$170.00
05/25/26	MR	Review documents from underlying claims in furtherance of privileged strategy matters relating to fourth amended plan confirmation proceedings in chapter 11 case.	1.90	$1,615.00
		Task Total:	4.20	$2,664.00

005 Bar Date Motion/ Claims Reconcil./ Claim Reconciliation Issues

05/01/26	NMCG	Call with Verita to discuss claim objection and noticing.	0.20	$165.00
05/07/26	MCM	Attention to late-filed claim matters in response to email correspondence from claimant counsel and in connection with hearing on first omnibus claim objection.	0.50	$525.00
05/11/26	MCM	Email correspondence with counsel for Claimant 495 regarding late-filed or amended claim subject to first omnibus claim objection (.5); similar correspondence with A. Scapa regarding additional claims with similar issues (.4).	0.90	$945.00
05/12/26	JCH	Prepare draft stipulation regarding Debtor's first omnibus claim objection and proposed order.	0.50	$210.00
05/12/26	MCM	Analysis of certain claim issues raised by R. Simons with respect to alleged duplicate claims (.3); email correspondence regarding same (.3); revise draft stipulation with A. Scapa regarding certain other claims in advance of hearing on 5/20 and email correspondence regarding same (.8); memo to file regarding remaining claims after negotiated resolutions (.6); email correspondence with Committee counsel regarding meet and confer on claims (.3).	2.30	$2,415.00

05/12/26	MRL	Analyze the response to the Debtor's claims objection (.2); correspondence with N. McGuffey and M. Moore regarding the same (.1).	0.30	$240.00
05/12/26	NMCG	Draft stipulation and proposed order in connection with omnibus claim objection (1.2); correspond with Foley team regarding the same (.2).	1.40	$1,155.00
05/12/26	SJM	Call with R. Simons regarding duplicate claim issue (.3); brief research regarding probate estate claims as distinct from individual capacity claims (.4); email to M. Moore regarding same (.3).	1.00	$925.00
05/13/26	JCH	Finalize and file stipulation regarding first omnibus claim objection and upload proposed order.	0.50	$210.00
05/13/26	MCM	Attention to stipulation regarding A. Scapa duplicate/amended claims (.3); prepare for hearing on 5/20 regarding duplicate and late-filed claims (.3); conference call with R. Simons regarding certain objected-to claims (.5).	1.10	$1,155.00
05/13/26	MRL	Correspondence with M. Moore and N. McGuffey regarding the objections to certain claims.	0.20	$160.00
05/13/26	NMCG	Review responses to claim objections (.1); finalize stipulation with claimant regarding the same (.2).	0.30	$247.50
05/13/26	SJM	Review stipulation with certain creditors to resolve omnibus objection.	0.30	$277.50
05/13/26	SJM	Analyze issues regarding late-filed claims.	0.70	$647.50
05/14/26	JCH	Pull copies of all responses related to Debtor's first omnibus claim objection and email folder link of same to M. Moore.	0.50	$210.00
05/14/26	MCM	Analysis of various responses and objections to first omnibus objection to late-filed claims, seeking allowance of such claims.	0.50	$525.00
05/14/26	MCM	Meet and confer with Committee counsel and claims review experts regarding duplicate, amended, and late-filed claims (.5); comprehensive memo to file regarding status of omnibus objection on claim-by-claim (.6).	1.10	$1,155.00
05/14/26	MRL	Email correspondence with the Foley team regarding the claim objections.	0.20	$160.00

05/14/26	NMCG	Analyze responses filed in opposition to Debtor's claim objection (.6); call with Committee professionals regarding the same (.3).	0.90	$742.50
05/15/26	AMUE	Provide advice to Foley team regarding claims objections.	0.50	$612.50
05/15/26	MCM	Email correspondence with counsel for various claimants regarding Debtor's first omnibus objection to claims (.5); revise draft reply to responses to various omnibus objections in preparation for filing in advance of hearing on 5/20 (1.0).	1.50	$1,575.00
05/15/26	MCM	Further updates to analysis of omnibus claim objections and status of individual claims.	0.50	$525.00
05/15/26	MRL	Confer with M. Moore and N. Walsh regarding the response to the objections to the Debtor's claim objection.	0.30	$240.00
05/15/26	NCW	Draft omnibus reply in support of Debtor's first omnibus claim objection.	3.70	$2,405.00
05/17/26	MCM	Continue revisions to reply in support of first omnibus claim objection prior to filing of same in advance of hearing.	1.00	$1,050.00
05/17/26	NCW	Continue drafting omnibus reply in support of Debtor's first omnibus claim objection.	3.10	$2,015.00
05/18/26	MCM	Email correspondence with claimant's counsel regarding proposed order and treatment of certain late-filed or amended claims (.3); revisions to reply in support of omnibus objection against same taking into account resolutions and negotiated outcomes (.7); work on script for hearing on 5/20 (.5).	1.50	$1,575.00
05/18/26	NCW	Revise omnibus reply in support of Debtor's first omnibus claim objection to incorporate comments from Foley team.	0.30	$195.00
05/18/26	NMCG	Revise claim objection reply and proposed order (1.1); correspond with Foley team regarding the same (.2).	1.30	$1,072.50
05/19/26	JCH	Finalize and file reply in support of Debtor's first omnibus claim objection.	0.20	$84.00

05/19/26	MCM	Prepare for hearing on Debtor's first omnibus claim objection to amended, duplicate, and late-filed claims (1.5); finalize reply in support of omnibus objection to claims and proposed order in advance of hearing on same (.6); further revisions to proposed order granting omnibus objection (.3).	2.40	$2,520.00
05/19/26	MDL	Revise reply brief in support of omnibus objection to late-filed claims.	0.20	$200.00
05/19/26	MRL	Prepare materials for the claims objection hearing.	0.40	$320.00
05/19/26	NCW	Revise omnibus reply in support of Debtor's motion to incorporate comments from Foley team.	0.30	$195.00
05/19/26	NMCG	Revise omnibus reply in support of claim objection and corresponding proposed order (.5); correspond with Foley team regarding the same (.1).	0.60	$495.00
05/19/26	SJM	Brief review of reply in support of claim objection.	0.30	$277.50
05/20/26	MCM	Post-hearing work on claims reconciliation and proposed order granting first omnibus claim objection of Debtor, including email correspondence with claimants' counsel.	1.00	$1,050.00
05/20/26	MCM	Analysis of impact of resolution with R. Simons' clients in connection with first omnibus objection to claims.	0.30	$315.00
05/20/26	MRL	Analyze the new response to the Debtor's claim objection.	0.20	$160.00
05/21/26	MCM	Follow-up email correspondence with claimants' counsel following hearing on first omnibus objection to claims filed by the Debtor.	0.30	$315.00
05/28/26	JCH	Update email to M. Kemner with list of upcoming hearings and Zoom instructions.	0.30	$126.00
05/28/26	MCM	Email and telephone communications with counsel for claimant regarding late-filed claim and hearing on same prior to confirmation hearing.	0.40	$420.00
05/29/26	JCH	Calendar updated deadlines and hearing on Claimant 563's cross-motion to allow late-filed claim.	0.30	$126.00

05/29/26	MCM	Conference call with late-filed claimant counsel regarding motion to allow and briefing schedule on same with review of proposed stipulation.	0.50	$525.00
		Task Total:	34.80	$30,463.50

006 Case Administration (docket updates, WIP, and calendar)

05/01/26	JCH	Calendar continued status conference (.2); update daily docket report (.5).	0.70	$294.00
05/04/26	JCH	Update master case calendar and timeline (.5); update daily docket report (.5).	1.00	$420.00
05/05/26	JCH	Update daily docket report.	0.50	$210.00
05/06/26	JCH	Update daily docket report.	0.50	$210.00
05/07/26	JCH	Prepare and file notice of core service list as of May 7, 2026 (.2); update daily docket report (.5).	0.70	$294.00
05/08/26	JCH	Update daily docket report.	0.50	$210.00
05/11/26	JCH	Update daily docket report.	0.50	$210.00
05/12/26	JCH	Calendar deadlines related to hearing on DIP Motion (.2); update daily docket report (.5).	0.70	$294.00
05/13/26	JCH	Update master case calendar and timeline (.5); update daily docket report (.5).	1.00	$420.00
05/14/26	JCH	Calendar hearings and objection deadlines related to numerous recent filings (.7); calendar informal conference with court regarding confirmation hearing logistics (.2); update daily docket report (.5).	1.40	$588.00
05/15/26	JCH	Update daily docket report.	0.20	$84.00
05/18/26	JCH	Update daily docket report.	0.50	$210.00
05/19/26	JCH	Update daily docket report.	0.50	$210.00
05/28/26	JCH	Calendar hearings and deadlines related to recent filings (.2); update master case calendar and timeline (.5); update daily docket report (.5).	1.20	$504.00
		Task Total:	9.90	$4,158.00

007 Chapter 11 Plan/ Plan Confirmation

05/01/26	AMUE	Prepare for (1.0) and meet with A&M regarding privileged matter (.8); meeting with A&M and finance team regarding cash forecast (1.0); analyze privileged issue relating to expert report of A&M (1.5); analyze privileged issue regarding expert reports (1.3).	5.60	$6,860.00
05/01/26	AMUE	Analyze issue relating to plan supplement.	1.00	$1,225.00
05/01/26	DBG	Review legal authority regarding First Amendment and bankruptcy authority regarding possible limits on court authority (1.5); communications with M. Moore regarding First Amendment research (.2).	1.70	$2,465.00
05/01/26	MCM	Prepare for and participate in conference call with expert witnesses in connection with revised expert reports (.7); email correspondence with expert witness regarding same (.2); analysis of expert report (.6).	1.50	$1,575.00
05/01/26	MRL	Analyze articles regarding the closure of churches.	0.40	$320.00
05/01/26	MRL	Draft the notice of filing the solicitation documents for the Debtor's plan.	0.90	$720.00
05/01/26	MRL	Revise the solicitation order for the Debtor's plan.	1.20	$960.00
05/01/26	MRL	Correspondence with M. Moore regarding the revisions to the disclosure statement.	0.30	$240.00
05/01/26	MRL	Finalize to file the ballots for the Debtor's plan.	1.50	$1,200.00
05/01/26	NMCG	Analyze Committee discovery deficiency letter.	0.30	$247.50
05/02/26	DBG	Continued review of legal authority regarding the First Amendment and bankruptcy authority regarding claims against religious bodies.	1.00	$1,450.00
05/02/26	MCM	Analysis of issues concerning child-protection protocols.	0.50	$525.00
05/03/26	MRL	Review Dr. Martin's amended expert report (.6); correspondence with M. Moore regarding the same (.2).	0.80	$640.00

05/03/26	NMCG	Draft amended 30(b)(6) deposition notice to Committee (.8); discuss the same with D. Goroff (.2).	1.00	$825.00
05/04/26	AMUE	Communications with A. Zimmerman regarding privileged issue (.4) and analyze the privileged issue (1.0).	1.40	$1,715.00
05/04/26	AMUE	Analyze witness disclosures (.6) and outline privileged issue relating to trial witnesses (1.0).	1.60	$1,960.00
05/04/26	AMUE	Analyze plan confirmation issues to outline trial responsibilities (1.5) and meeting with M. Lee regarding same (.8).	2.30	$2,817.50
05/04/26	DBG	Review letter from M. Kaplan regarding liquidation analysis (.4); communications with A. Bardos regarding Rule 30(b)(6) deposition (.2); communications with E. Ridley regarding A. Bardos preparation (.4); revise amended notice of M. Babcock deposition (.4); communications with M. Kemner regarding constitutional issues and confirmation hearing strategy (.5); review article regarding NY Diocese (.2).	2.10	$3,045.00
05/04/26	MDL	Strategize with Foley team regarding terms of insurance assignment.	0.60	$600.00
05/04/26	MDL	Strategize with E. Ridley regarding Chubb demand for inclusion of language on non-abuse policies in confirmation order.	0.20	$200.00
05/04/26	MDL	Strategize with A. Uetz regarding plan confirmation hearing schedule and witness order.	0.60	$600.00
05/04/26	MDL	Email exchange with J. Bonteque (Duane Morris) regarding Chubb demand for inclusion of language on non-abuse policies in confirmation order.	0.20	$200.00
05/04/26	MRL	Email correspondence with the Foley team regarding the expert reports.	0.20	$160.00
05/04/26	MRL	Email correspondence with the Committee regarding the solicitation order.	0.20	$160.00
05/04/26	MRL	Correspondence with S. Moses regarding the dates for the confirmation hearing.	0.20	$160.00
05/04/26	MRL	Continue analyzing Dr. Martin's amended expert report.	0.30	$240.00

05/04/26	NMCG	Revise amended notice of corporate deposition to Committee (.6); prepare subpoenas in connection with future depositions (.8); confer on drafts with D. Goroff (.3); review documents for second supplemental production for privilege and other confidential matters (.9); correspond with Foley team regarding production (.5); finalize production and correspond with opposing counsel regarding the same (.3); strategize with D. Goroff regarding upcoming deposition prep of A. Bardos in connection with insurers 30(b)(6) deposition (.2).	3.60	$2,970.00
05/04/26	SJM	Detailed email response to A. Uetz regarding approach to insurance assignment.	0.50	$462.50
05/05/26	AMUE	Analyze privileged issue relating to expert reports (1.2) and communications with A&M regarding same (.4).	1.60	$1,960.00
05/05/26	AMUE	Analyze privileged information relating to 30(b)(6) deposition.	1.00	$1,225.00
05/05/26	AMUE	Communication with A. Zimmerman and M. Lee regarding privileged issue (.7) and review information relating to same (.8).	1.50	$1,837.50
05/05/26	DBG	Prepare A. Bardos for insurer Rule 30(b)(6) deposition (1.2); review materials for A. Bardos' preparation (.6); conference with A&M regarding completion of C. Moore report (.5); letter to M. Kaplan regarding liquidation analysis (.3); conference with M. Kemner regarding constitutional issues and confirmation hearing strategy (.8); respond to M. Kemner analysis of issues for confirmation hearing (1.8).	5.20	$7,540.00
05/05/26	ERR	Participate in deposition preparation of A. Bardos.	1.30	$1,625.00
05/05/26	JCH	Calendar extended plan objection deadline for insurers only.	0.20	$84.00
05/05/26	MCM	Analyze expert report of D. Martin for NERA (.6); email correspondence regarding same (.4); analysis of hypothetical post-conversion litigation costs (.5).	1.50	$1,575.00
05/05/26	MDL	Telephone conference with A&M, P. Bongiovanni, and VeraCruz regarding strategy for selling real estate assets during plan period.	0.50	$500.00

05/05/26	MDL	Evaluate Hilco's updated real estate valuations.	0.30	$300.00
05/05/26	MDL	Summarize open issues with respect to Chubb's proposed insert to confirmation order on non-abuse policies.	0.40	$400.00
05/05/26	MDL	Further revisions to Chubb's proposed insert to confirmation order on non-abuse policies.	0.10	$100.00
05/05/26	MDL	Telephone conference with J. Bonteque (Duane Morris) regarding Chubb's proposed insert to confirmation order on non-abuse policies.	0.40	$400.00
05/05/26	MDL	Email correspondence with J. Bonteque (Duane Morris) regarding RCBO edits to Chubb's proposed insert to confirmation order on non-abuse policies.	0.10	$100.00
05/05/26	MDL	Evaluate draft of A&M expert report.	0.30	$300.00
05/05/26	MDL	Telephone conference with Hilco regarding liquidation value of real estate.	0.90	$900.00
05/05/26	MRL	Continue analyzing articles regarding the closure of churches.	0.30	$240.00
05/05/26	MRL	Analyze M. Moore's comments on the Martin expert report.	0.30	$240.00
05/05/26	MRL	Review email correspondence with the Foley team regarding revisions to the confirmation order.	0.30	$240.00
05/05/26	MRL	Analyze the insurers' objection to the Debtor's plan.	0.30	$240.00
05/05/26	MRL	Email correspondence with the Foley team regarding the expert reports.	0.30	$240.00
05/05/26	NMCG	Strategize regarding revisions with D. Goroff to amended notice of 30(b)(6) deposition to Committee (.2); revise amended notice to incorporate edits (.3).	0.50	$412.50
05/06/26	AMUE	Analyze legal issue to direct legal research regarding to plan confirmation.	1.10	$1,347.50
05/06/26	AMUE	Communications with M. Kemner regarding legal strategy.	0.50	$612.50
05/06/26	AMUE	Communications with A&M regarding privileged issue (.6) and work on expert report issue (1.8).	2.40	$2,940.00

05/06/26	DBG	Conference with Committee counsel regarding scheduling depositions (.5); communications with A. Uetz regarding strategy issues for discussion with M. Kemner (.2).	0.70	$1,015.00
05/06/26	MCM	Conference call with expert witness regarding finalization of amended report (.5); review materials from different expert witness regarding same with respect to their report (.5); follow up on canon law expert report (.3).	1.30	$1,365.00
05/06/26	MRL	Draft the confirmation brief in support of the Debtor's plan.	1.40	$1,120.00
05/06/26	MRL	Call with I. Velikova regarding the amended expert report.	0.20	$160.00
05/06/26	MRL	Call with the Committee and Foley teams to discuss the confirmation schedule.	0.50	$400.00
05/06/26	MRL	Call with the NERA and Foley teams to discuss the amended expert report.	0.70	$560.00
05/06/26	MRL	Revise the solicitation order to conform to the Committee's comments (.4); draft the notice of filing the solicitation order (.5).	0.90	$720.00
05/06/26	NMCG	Attend insurers' deposition of A. Bardos (6.0); analyze Committee's supplemental discovery requests (.3).	6.30	$5,197.50
05/06/26	SJM	Attention to Committee request to revise solicitation procedures order.	0.60	$555.00
05/06/26	SJM	Review prior analysis of litigation cost in hypothetical chapter 7 for purposes of liquidation analysis, and analyze approach to updating same (1.8); prepare updated analysis of litigation costs (2.3).	4.10	$3,792.50
05/06/26	SJM	Call with Committee counsel, D. Goroff, and A. Uetz regarding scheduling for plan confirmation hearing.	0.40	$370.00
05/07/26	AMUE	Meeting with T. Dolcourt to discuss priivileged issue relating to plan confirmation (.4) and analyze issue (.8).	1.20	$1,470.00
05/07/26	AMUE	Analyze issues relating to liquidation analysis.	1.50	$1,837.50
05/07/26	AMUE	Facilitate finalizing expert reports due today.	1.20	$1,470.00

05/07/26	AMUE	Analyze discovery requests.	0.80	$980.00
05/07/26	AMUE	Analyze issues relating to liquidation analysis including communications with Hilco.	2.40	$2,940.00
05/07/26	MCM	Work on issues in connection with finalization of various expert reports by deadline in scheduling order, including conference calls with various parties (1.5); analysis of prior hearings in connection with confirmation strategy (1.0); email correspondence with various parties regarding expert reports (.3).	2.80	$2,940.00
05/07/26	MDL	Multiple communications with Hilco team regarding finalization of expert report.	1.40	$1,400.00
05/07/26	MDL	Evaluate Hilco and A&M expert reports.	1.40	$1,400.00
05/07/26	MDL	Strategize with Foley team regarding completion of expert reports.	0.80	$800.00
05/07/26	MDL	Multiple communications with A&M team regarding finalization of expert report.	1.30	$1,300.00
05/07/26	MRL	Correspondence with T. Dolcourt regarding privileged confirmation matter.	0.20	$160.00
05/07/26	MRL	Email correspondence with the Foley team regarding the order approving the disclosure statement.	0.20	$160.00
05/07/26	MRL	Analyze the D. Martin expert report (1.9); email correspondence with NERA regarding the same (.3).	2.20	$1,760.00
05/07/26	NMCG	Finalize and serve amended deposition notice on Committee (.4); correspond with M. Moore and D. Goroff regarding the same (.2); work on draft subpoenas in connection with confirmation discovery (.2).	0.80	$660.00
05/07/26	SJM	Call with courtroom deputy to confirm available trial dates (.2); email to Committee counsel regarding same (.2).	0.40	$370.00
05/07/26	SJM	Revise litigation cost estimate based on comments.	0.70	$647.50
05/07/26	TND	Discuss research on privileged plan matter with A. Uetz (.4); begin research on same (1.0).	1.40	$1,232.00

05/08/26	AMUE	Analyze privileged issue relating to plan confirmation.	2.00	$2,450.00
05/08/26	JCH	Email correspondence with Foley team regarding notice of revised forms of plan solicitation documents (.2); prepare exhibits for same (.2); finalize and file notice of revised forms of plan solicitation documents (.2); upload proposed order on first amended disclosure statement (.2); file notice of confirmation hearing (.2).	1.00	$420.00
05/08/26	MCM	Attention to final affirmative expert report issues prior to dissemination (1.0); analyze expert reports from Committee received at deadline (1.5); analysis of A. Bardos' 30(b)(6) deposition by certain insurers (.6).	3.10	$3,255.00
05/08/26	MRL	Confer with M. Moore regarding preparations for the hearing.	0.20	$160.00
05/08/26	MRL	Revise the proposed order confirming the disclosure statement.	0.60	$480.00
05/08/26	MRL	Revise the Debtor's solicitation version of the disclosure statement.	0.50	$400.00
05/08/26	MRL	Revise the notice of the confirmation hearing.	0.70	$560.00
05/08/26	MRL	Email correspondence with NERA regarding finalizing the expert report.	0.30	$240.00
05/08/26	MRL	Revise the ballots to conform to the disclosure statement.	1.50	$1,200.00
05/08/26	NCW	Review transcripts to identify statements to inform analysis of privileged issue.	3.40	$2,210.00
05/08/26	NMCG	Analyze Committee objection to plan.	0.50	$412.50
05/08/26	SJM	Review proposed language for resolving non-abuse insurer concerns regarding confirmation order.	0.30	$277.50
05/08/26	TND	Further research on privileged plan matter.	0.50	$440.00
05/09/26	MCM	Analysis of Committee expert reports/amended expert reports in connection with confirmation of Debtor's modified fourth amended plan.	1.50	$1,575.00
05/09/26	TND	Further research on privileged plan matter.	1.00	$880.00

05/10/26	MCM	Analysis of Committee objection to confirmation of Debtor's modified fourth amended plan.	1.20	$1,260.00
05/11/26	AMUE	Strategize with M. Lee regarding trial strategy (.6); meeting with M. Kaplan regarding discovery and expert depositions (.7).	1.30	$1,592.50
05/11/26	AMUE	Trial preparation: outline witnesses and issues relating to each for trial.	3.00	$3,675.00
05/11/26	DBG	Revise subpoenas for Committee members' depositions (.3); conferences with N. McGuffey regarding subpoenas (.3); communications with T. Schiavoni regarding deposition (.2); respond to T. Schiavoni email regarding subpoena (.2); review M. Plevin email regarding subpoenas (.2); communications with A. Uetz regarding hearing strategy issues (.4); communications with M. Kaplan regarding second session of M. Babcock deposition (.3); communication with E. Ridley regarding deposition (.1); team communications regarding Committee ex parte motion for additional pages in confirmation brief (.1); begin drafting ideas for motions in limine (.8); advise regarding insurers' delayed objections to disclosure statement (.3); team communications regarding expert witness depositions and preparation (.5).	3.70	$5,365.00
05/11/26	MCM	Continued analysis of Committee objection to confirmation as well as reservation of rights from U.S. Trustee.	0.90	$945.00
05/11/26	MCM	Analysis of Committee expert reports and potential rebuttal topics for Debtor experts (2.0); email correspondence with various Debtor experts regarding same (.4).	2.40	$2,520.00
05/11/26	MRL	Email correspondence with NERA regarding preparations for the deposition of Dr. Martin.	0.40	$320.00
05/11/26	MRL	Email correspondence with the Foley team regarding the expert depositions.	0.70	$560.00
05/11/26	MRL	Analyze the Committee's objection to the Debtor's plan.	0.60	$480.00

05/11/26	MRL	Analyze binders in preparation for the confirmation hearing (.6); email correspondence with N. Ortega and M. Moore regarding the same (.4).	1.00	$800.00
05/11/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	1.50	$1,200.00
05/11/26	MRL	Email correspondence with Verita regarding the solicitation documents.	0.60	$480.00
05/11/26	NMCG	Assist with expert reports in connection with ongoing discovery (1.2); finalize and serve subpoenas on Committee counsel (.5); correspond with Foley team regarding the same (.3).	2.00	$1,650.00
05/11/26	TND	Further privileged plan research.	1.40	$1,232.00
05/12/26	AMUE	Analyze expert witness reports to consider strategy relating to rebuttal reports.	1.60	$1,960.00
05/12/26	AMUE	Analyze objection to plan confirmation filed by Committee to communicate with client regarding same.	1.40	$1,715.00
05/12/26	DBG	Draft substantive response to M. Plevin email (1.0); confer with M. Lee regarding Committee's supplemental discovery requests (.4); draft motions in limine topics (1.0); communications with M. Kemner regarding trustee objection to plan and issues regarding confirmation (.5).	2.90	$4,205.00
05/12/26	GSG	Telephone conference with D. Goroff regarding motion in limine issues.	0.20	$235.00
05/12/26	MCM	Email correspondence with C. Moore regarding opposing expert reports and analysis of same.	0.40	$420.00
05/12/26	MCM	Attention to non-abuse insurance policy issues and potential language.	0.40	$420.00
05/12/26	MCM	Work on issues in connection with expert report of Dr. D. Martin (.5); continue analysis of Committee objection to confirmation (1.0); analyze outline of confirmation brief in light of objections received to date (.5); continue review of Committee expert reports in advance of depositions (1.3).	3.30	$3,465.00

05/12/26	MDL	Analyze revised draft of Chubb entity demand for additional language in the confirmation order sent by J. Bonteque (Duane Morris).	0.20	$200.00
05/12/26	MDL	Email exchange with J. Bonteque (Duane Morris) regarding Chubb entity demand for additional language in the confirmation order.	0.40	$400.00
05/12/26	MDL	Evaluate recommendation to client regarding confidential plan confirmation subject.	0.10	$100.00
05/12/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	1.70	$1,360.00
05/12/26	MRL	Analyze the McNally expert report in comparison to older reports (1.0); draft an email to M. Moore regarding the same (.2).	1.20	$960.00
05/12/26	MRL	Revise the calendar for the confirmation hearing.	0.30	$240.00
05/12/26	MRL	Confer with M. Moore regarding reviewing the McNally expert report.	0.40	$320.00
05/12/26	MRL	Analyze documents regarding the Clergy III settlement (.4); correspondence with M. Moore regarding the same (.2).	0.60	$480.00
05/12/26	NMCG	Prepare motion to strike late-filed pleading and proposed order.	2.00	$1,650.00
05/12/26	SJM	Email to A&M regarding filed objections to plan.	0.20	$185.00
05/12/26	SJM	Call with chambers regarding scheduling of pre-trial and related matters (.2); email to case team regarding same (.2).	0.40	$370.00
05/12/26	SJM	Analyze non-abuse insurer plan language.	0.40	$370.00
05/13/26	AMUE	Develop trial plan for witnesses.	2.40	$2,940.00
05/13/26	AMUE	Foley trial team meeting regarding strategy for trial.	1.50	$1,837.50

05/13/26	DBG	Conference with M. Kaplan regarding M.Babcock deposition (.2); conferences with M. Kaplan regarding refusals of subpoenas by Committee members (.4); conference with R. Simons regarding Committee member subpoena (.3); communications with Office of J. George, members' counsel, regarding subpoenas (.3); team conference led by A. Uetz regarding tasks for trial (1.4); follow up regarding conference regarding tasks for trial (.4).	3.00	$4,350.00
05/13/26	MCM	Prepare for depositions of P. Shields and K. McNally in Chicago the week of 5/25.	0.80	$840.00
05/13/26	MCM	Conference call with M. Lee regarding non-abuse insurance policies (.3); attention to confirmation hearing logistical issues (.5).	0.80	$840.00
05/13/26	MCM	Analysis of insurer objections to confirmation.	2.00	$2,100.00
05/13/26	MDL	Strategize with Foley team regarding plan confirmation hearing and evidence to be used in support of confirmation.	1.70	$1,700.00
05/13/26	MDL	Strategize with M. Moore regarding expert witness order and core testimony.	0.40	$400.00
05/13/26	MDL	Telephone conference with J. Bonteque (Duane Morris) regarding proposed language for confirmation order addressing non-abuse policies.	0.20	$200.00
05/13/26	MDL	Email exchange with J. Bonteque (Duane Morris) regarding proposed language for confirmation order addressing non-abuse policies.	0.50	$500.00
05/13/26	MDL	Revise proposed language for confirmation order addressing non-abuse policies.	0.40	$400.00
05/13/26	MRL	Email correspondence with NERA regarding the rebuttal expert report.	0.30	$240.00
05/13/26	MRL	Begin drafting the pretrial order for the confirmation hearing.	0.40	$320.00
05/13/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	2.40	$1,920.00
05/13/26	NMCG	Draft discovery motion in connection with outstanding subpoenas (5.3); revise motion to strike (.2); attention to upcoming expert deposition preparation (.1).	5.60	$4,620.00

05/13/26	SJM	Prepare detailed analysis of Committee objection to plan.	3.90	$3,607.50
05/13/26	SJM	Attend strategy call regarding Committee objection and next steps.	1.50	$1,387.50
05/14/26	AMUE	Prepare for (1.0) and meeting with Foley team (1.0) to strategize regarding trial plan (witnesses and exhibits).	2.00	$2,450.00
05/14/26	AMUE	Analyze privileged issue regarding exit funding and communication with C. Moore and D. Flanagan regarding same.	0.90	$1,102.50
05/14/26	AMUE	Analyze A&M expert rebuttal report issues.	1.20	$1,470.00
05/14/26	DBG	Draft motion to compel depositions of Committee members (2.0); communications with N. McGuffey regarding same (.4); review legal research regarding same (.4); participate in A&M prep call (.4); communications with M. Kaplan regarding conferral subjects for 5/15 conference (.3); team call led by A. Uetz (1.0); follow up regarding call (.2).	4.70	$6,815.00
05/14/26	MCM	Meeting with A&M regarding expert rebuttal report and analysis.	0.70	$735.00
05/14/26	MCM	Analysis of plan confirmation in light of filed objections and likely evidentiary burdens.	3.00	$3,150.00
05/14/26	MCM	Meeting with D. Martin and team regarding expert rebuttal report and related analysis.	0.50	$525.00
05/14/26	MCM	Prepare for (.5) and participate in (1.0) Foley team call regarding case and trial strategy.	1.50	$1,575.00
05/14/26	MDL	Evaluate insurer objections to plan confirmation.	1.20	$1,200.00
05/14/26	MRL	Email correspondence with NERA regarding the rebuttal expert report.	0.20	$160.00
05/14/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	1.80	$1,440.00
05/14/26	MRL	Continue drafting the pretrial order for the confirmation hearing.	1.50	$1,200.00
05/14/26	MRL	Call with A&M and Foley teams regarding the expert rebuttal report.	0.70	$560.00

05/14/26	MRL	Review email correspondence from the Foley team regarding the depositions schedule.	0.20	$160.00
05/14/26	MRL	Review email correspondence from the Foley team regarding the confirmation hearing.	0.20	$160.00
05/14/26	MRL	Call with the NERA and Foley teams regarding the rebuttal expert report.	0.70	$560.00
05/14/26	NCW	Review transcripts to identify statements to inform analysis of privileged issue.	0.40	$260.00
05/14/26	NCW	Analyze objections to confirmation.	2.70	$1,755.00
05/14/26	NMCG	Finalize the motion to strike and proposed order (.6); draft the motion to compel to incorporate edits received from Foley team (4.6); prepare D. Goroff declaration in support (1.4); finalize motion, proposed order, and declaration with exhibits of motion to compel for filing (.5); correspondence with Foley team regarding drafts and filing of the same (.2).	7.30	$6,022.50
05/14/26	SJM	Further analysis of Committee objection to plan confirmation (.4); email to case team regarding same (.2).	0.60	$555.00
05/14/26	SJM	Review insurer objections to plan confirmation.	1.40	$1,295.00
05/14/26	SJM	Prepare response to ex parte applications to enlarge page limits.	0.60	$555.00
05/14/26	SJM	Review prior transcripts regarding certain issues for trial.	0.20	$185.00
05/14/26	TND	Further research on privileged confirmation matter (.8); research on compelling testimony for motion to compel (2.5).	3.30	$2,904.00
05/15/26	AMUE	Analyze Committee's objection to plan confirmation (.9) and communications with M. Lee regarding client communication relating to same (.3); revisions to client communication (.8); communication with client leadership regarding same (.4).	2.40	$2,940.00
05/15/26	AMUE	Meeting with M. Kaplan (partial) regarding discovery issues.	0.50	$612.50

05/15/26	DBG	Conference with M. Kaplan, C. Restel, C. Stewart, T. Connors, A. Uetz, M. Moore, and N. McGuffey regarding evidentiary presentation at hearing and discovery disputes (.9); follow-up communications with M. Kaplan regarding M. Babcock deposition rescheduling (.1).	1.00	$1,450.00
05/15/26	MCM	Prepare for contested confirmation beginning June 15, 2026.	2.00	$2,100.00
05/15/26	MRL	Analyze the A. Bardos deposition transcript.	0.40	$320.00
05/15/26	MRL	Continue drafting the pretrial order for the confirmation hearing.	1.30	$1,040.00
05/15/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	3.10	$2,480.00
05/15/26	MRL	Email correspondence with the Foley team regarding the expert depositions.	0.20	$160.00
05/15/26	NMCG	Meet and confer with Committee counsel to discuss discovery motions as well as trial logistics (1.0); coordinate with Foley team regarding upcoming depositions and preparations regarding the same (.4).	1.40	$1,155.00
05/17/26	MCM	Analyze rebuttal expert reports in advance of deadline to serve same during week of 5/18 (1.5); work on logistics in connection with depositions in Chicago during week of 5/25 (.7).	2.20	$2,310.00
05/17/26	MRL	Email correspondence with NERA regarding the rebuttal expert report.	0.30	$240.00
05/18/26	DBG	Communications with A. Uetz regarding motions in limine (.2); communications with M. Kemner regarding confirmation hearing evidence and strategy and responses to same (.3).	0.50	$725.00
05/18/26	MCM	Attention to expert report issues prior to dissemination of same (.5); attention to deposition scheduling in Chicago in the week of May 25 (.5); review draft confirmation brief and analyze potential structure (1.0).	2.00	$2,100.00
05/18/26	MCM	Informal logistics conference with court, court personnel, and other related parties in advance of June 15 commencement of confirmation hearing.	1.50	$1,575.00

05/18/26	MCM	Analysis of proposed motions in limine and related issues prior to conference call regarding same.	0.50	$525.00
05/18/26	MCM	Additional comments to expert rebuttal reports prior to deadline for same.	0.50	$525.00
05/18/26	MCM	Conference call with expert witnesses regarding rebuttal report to McNally affirmative report.	0.50	$525.00
05/18/26	MDL	Evaluate insurer objections to plan confirmation.	1.90	$1,900.00
05/18/26	MRL	Call with the NERA and Foley teams regarding the rebuttal expert report.	0.30	$240.00
05/18/26	MRL	Correspondence with M. Moore regarding Dr. Martin's rebuttal expert report.	0.20	$160.00
05/18/26	MRL	Email correspondence with the Foley team regarding the deposition schedule.	0.30	$240.00
05/18/26	MRL	Review Dr. Martin's rebuttal expert report.	1.50	$1,200.00
05/18/26	MRL	Email correspondence with the Foley team regarding preparations for the confirmation hearing.	0.40	$320.00
05/18/26	MRL	Email correspondence with the NERA team regarding the exhibits to the rebuttal expert report.	0.60	$480.00
05/18/26	NMCG	Assist in preparations for upcoming expert depositions (.6); draft Debtor's position on joint letter regarding discovery issues (3.7); research case law in connection with the same (.8); correspond with Foley team regarding the same (.3).	5.40	$4,455.00
05/18/26	TND	Further research on privileged plan confirmation matter.	1.20	$1,056.00
05/19/26	AMUE	Prepare for (.5) and meet with VeraCruz and A&M regarding privileged issue concerning exit funding (.5).	1.00	$1,225.00
05/19/26	AMUE	Prepare for (.5) and meet with Foley team to analyze motions in limine and possible Daubert motion(s) (1.0).	1.50	$1,837.50

05/19/26	DBG	Draft joint letter motion to Judge Lafferty regarding discovery disputes (4.0); analyze C. Moore's rebuttal report and communications regarding same (1.0); communications with M. Kemner regarding case strategy (.3); conference regarding RCBO loan availability with A. Uetz, D. Flanagan, and C. de Quesada (1.0); communications with M. Rofaeil regarding trial subpoenas to Committee members (.3); team conference regarding motions in limine (1.0); preparations for deposition of P. Shields and exhibits regarding same (.9); edit omnibus reply regarding late-filed claims (.4); email to Bishop Barber, M. Kemner, and A. Bardos regarding motion to compel Committee representative depositions (.1).	9.00	$13,050.00
05/19/26	MCM	Analysis of confirmation issues and related research pending depositions in Chicago the week of 5/25 (1.7); email correspondence with Committee regarding page limits on confirmation brief (.3).	2.00	$2,100.00
05/19/26	MCM	Prepare for depositions of P. Shields and K. McNally as Committee experts (.5); analysis of A. Bardos' 30(b)(6) deposition transcript (.5).	1.00	$1,050.00
05/19/26	MDL	Evaluate differences in core plan terms between Committee plan and Debtor plan.	1.20	$1,200.00
05/19/26	MRL	Correspondence with N. Ortega and M. Moore regarding preparations for the expert depositions.	0.60	$480.00
05/19/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	2.60	$2,080.00
05/19/26	MRL	Continue drafting the pretrial order for the confirmation hearing.	0.50	$400.00
05/19/26	MRL	Email correspondence with the Foley team regarding the deposition schedule.	0.30	$240.00
05/19/26	MRL	Call with the Foley team regarding strategies for Daubert motions (1.0); follow up on same (.3).	1.30	$1,040.00
05/19/26	MRL	Analyze documents for confirmation hearing binders.	0.20	$160.00

05/19/26	NMCG	Revise Debtor's position for joint discovery letter with Committee to incorporate edits received from Foley team and client as well as to incorporate Committee's position into final draft for review (3.8); correspond with Foley team and Committee counsel regarding joint letter (.4); prepare for upcoming expert depositions (.7).	4.90	$4,042.50
05/19/26	NMCG	Foley team call to discuss upcoming trial deadlines and strategy in connection with confirmation trial (1.0); prepare for same (.6).	1.60	$1,320.00
05/19/26	TND	Further research on privileged plan confirmation matters.	2.60	$2,288.00
05/20/26	AMUE	Communications with counsel for Committee regarding depositions.	0.50	$612.50
05/20/26	AMUE	Work on preparation for expert depositions.	1.00	$1,225.00
05/20/26	AMUE	Analyze possible MILs to direct drafting of same.	0.50	$612.50
05/20/26	DBG	Review C. Moore's rebuttal expert report and related communications (.7); participate in hearing regarding claims objections (1.0); follow up with M. Moore regarding same (.1); conference with N. McGuffey regarding notices of deposition of Committee experts (.2); prepare for P. Shields' deposition (1.4).	3.40	$4,930.00
05/20/26	MCM	Review deposition notices and schedule for depositions in Chicago the week of May 25, 2026.	0.50	$525.00
05/20/26	MCM	Prepare for depositions of P. Shields and K. McNally as Committee experts.	0.50	$525.00
05/20/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	2.10	$1,680.00
05/20/26	MRL	Draft an email to the Foley team regarding the pretrial order for the confirmation hearing.	0.20	$160.00
05/20/26	MRL	Email correspondence with the Foley team regarding preparations for the confirmation hearing.	0.40	$320.00
05/20/26	MRL	Email correspondence with NERA regarding the rebuttal expert report.	0.20	$160.00
05/20/26	MRL	Email correspondence with the Foley team regarding the schedule of depositions.	0.40	$320.00

05/20/26	NCW	Research concerning evidentiary considerations in connection with plan confirmation.	0.30	$195.00
05/20/26	NMCG	Prepare notices of deposition (.6); assist in preparations for upcoming expert depositions (1.0); correspond with Foley team and Committee counsel regarding the same (.6).	2.20	$1,815.00
05/20/26	SJM	Prepare further analysis of Committee objection to plan confirmation and responses to Committee arguments.	3.00	$2,775.00
05/20/26	TND	Further research on privileged plan confirmation matter.	1.40	$1,232.00
05/21/26	AMUE	Attend C. Moore deposition (partial) (5.0); prepare for trial witness testimony (7.0).	12.00	$14,700.00
05/21/26	DBG	Preparations for oral argument regarding motions regarding discovery issues (1.5); conduct oral argument regarding motion regarding discovery issues (1.1); prepare summary of ruling regarding motion regarding oral argument and next steps (.5); team meeting regarding trial themes (1.0); conference regarding Committee written discovery (.5); communications with C. de Quesada regarding real estate report (.3); review expert deposition notices and advise N. McGuffey regarding same (.3); communications with S. Levitt regarding revisions to C. Moore rebuttal expert report (.2).	5.40	$7,830.00
05/21/26	ERR	Attend bankruptcy trial team meeting regarding preparation for trial discovery and trial.	1.00	$1,250.00
05/21/26	MCM	Prepare for depositions the week of May 25, 2026 in Chicago in connection with confirmation of the modified fourth amended plan, including K. McNally and P. Shields.	1.70	$1,785.00
05/21/26	MRL	Correspondence with A. Uetz regarding preparations for the confirmation hearing.	0.20	$160.00
05/21/26	MRL	Review email correspondence from the Committee regarding the schedule of the depositions.	0.50	$400.00
05/21/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	1.30	$1,040.00

05/21/26	MRL	Email correspondence with NERA regarding finalizing the rebuttal expert report.	0.30	$240.00
05/21/26	NMCG	Finalize and serve deposition notices in connection with upcoming expert discovery (.3); correspond with Foley team and Committee counsel regarding scheduling and other deposition logistics (.6); assist in preparations for upcoming depositions (1.4); correspond with Foley team regarding preparations of depositions and other outstanding issues related to discovery requests (.5).	2.80	$2,310.00
05/21/26	SJM	Meeting with case team regarding trial planning.	1.40	$1,295.00
05/21/26	TND	Further research on privileged confirmation matter (.8); draft research findings for A. Uetz (1.3).	2.10	$1,848.00
05/21/26	WD	Prepare and e-file transcript order form for case management conference and prepare, serve and file notice of intention to file motion for new trial.	1.00	$480.00
05/22/26	AMUE	Prepare for trial witness testimony.	7.00	$8,575.00
05/22/26	DBG	Prepare P. Shields' deposition outline and review materials regarding same.	8.00	$11,600.00
05/22/26	MCM	Prepare for deposition of K. McNally, Committee claims expert (2.0); revise existing draft brief in support of confirmation (1.2); conference call with D. Goroff and N. McGuffey in preparation for Committee expert P. Shields (.6); conference call with D. Goroff and client parties regarding deposition of Committee expert P. Shields (.7).	4.50	$4,725.00
05/22/26	MDL	Evaluate Duane Morris' revisions to confirmation order language on Chubb non-abuse policies.	0.20	$200.00
05/22/26	MDL	Email exchange with J. Bonteque regarding confirmation order language on Chubb non-abuse policies.	0.10	$100.00
05/22/26	MRL	Email correspondence with the Foley team regarding the expert depositions.	0.40	$320.00
05/22/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	0.80	$640.00
05/22/26	NCW	Research evidentiary issues pertaining to confirmation.	1.70	$1,105.00

05/22/26	NMCG	Prepare for P. Shields' deposition (5.2); meeting with Foley team to discuss strategy regarding P. Shields' and K. McNally's depositions (1.0); meeting with VeraCruz to discuss P. Shields' deposition and other issues related thereto (1.0); finalize and serve amended 30(b)(6) notice regarding M. Babcock's continued deposition (.3).	7.50	$6,187.50
05/22/26	WD	Coordinate payment for hearing transcript.	0.20	$96.00
05/23/26	DBG	Review P. Shields' rebuttal and exhibits (1.3); edit outline of confirmation brief (.9); communications with M Moore regarding same (.1); communications with N. McGuffey regarding motions in limine and topics (.6).	2.90	$4,205.00
05/23/26	MCM	Prepare for deposition of K. McNally, Committee claims expert (1.5); revise outline for draft brief in support of confirmation (1.2); email correspondence with D. Goroff and N. McGuffey regarding same (.3).	3.00	$3,150.00
05/23/26	NMCG	Assist in preparation for P. Shields' deposition (.8); discuss potential discovery motions to file with D. Goroff and N. Walsh (.6); begin prepping discovery motions (.4).	1.80	$1,485.00
05/24/26	DBG	Communications with M. Kemner regarding issues regarding confirmation brief (.3); review A. Uetz response to M. Kemner regarding suggested response to Committee opposition to confirmation (.2).	0.50	$725.00
05/24/26	MCM	Revisions to draft confirmation brief argument outline based on feedback from various parties.	0.80	$840.00
05/24/26	MCM	Continue preparation for expert depositions of K. McNally, P. Shields, and C. Moore in Chicago in the week of May 25.	2.50	$2,625.00
05/24/26	MRL	Email correspondence with M. Moore and N. McGuffey regarding the confirmation brief.	0.30	$240.00
05/24/26	NMCG	Analyze insurer confirmation objections in connection with upcoming motions (1.2); correspond with N. Walsh regarding research and potential discovery motions (.4); assist in preparations for P. Shields' deposition (.5).	2.10	$1,732.50

05/25/26	DBG	Continue drafting outline of P. Shields' deposition (6.8); communications with N. McGuffey regarding exhibits to P. Shields' deposition (.7); review confirmation brief (.9); email to group regarding MIL regarding insurers (.2); review K. McNally outline (1.1).	9.70	$14,065.00
05/25/26	MCM	Preparation for deposition of K. McNally, expert for the Committee on claim valuation (3.5); review revised confirmation brief and comments to same (.9).	4.40	$4,620.00
05/25/26	MCM	Additional work on confirmation brief.	1.50	$1,575.00
05/25/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	1.10	$880.00
05/25/26	MRL	Revise the K. McNally deposition outline (.8); correspondence with M. Moore regarding the same (.2).	1.00	$800.00
05/25/26	NMCG	Assist in preparations for P. Shields' deposition (.7); continue working on other discovery motions in connection with confirmation hearing (1.1).	1.80	$1,485.00
05/26/26	AMUE	Prepare for meeting with C. Moore relating to expert deposition (1.8); meeting with Foley team and C. Moore and S. Levitt to prepare for deposition (1.0); follow on work regarding rebuttal report (1.0).	3.80	$4,655.00
05/26/26	DBG	Prep of C. Moore (1.0); review materials for prep of C. Moore (.4); communications with S. Levitt and N. McGuffey regarding P. Shields preparation (.5); communications with S. Moses regarding pretrial order and insurers (.1); prepare for P. Shields' deposition and review exhibits regarding same (6.0); communications with M. Moore regarding K. McNally in preparation for P. Shields (.4).	8.40	$12,180.00
05/26/26	ERR	Review materials (.5) and attend deposition preparation of C. Moore (1.0).	1.50	$1,875.00

05/26/26	MCM	Attend deposition of K. McNally, Committee claims valuation expert, in connection with confirmation (4.0); preparation with D. Goroff for deposition of P. Shields in connection with same (2.2); attention to confirmation brief (1.5); meeting with C. Moore and Foley team regarding liquidation analysis and preparation for deposition on Thursday, May 28 (partial) (.6).	8.30	$8,715.00
05/26/26	MR	Analyze documents in furtherance of evaluating insurance-related strategy issues for chapter 11 plan confirmation proceedings (1.0); email communications with M. Moore and E. Ridley regarding same (.2); attend strategy call with E. Ridley regarding same (.2).	1.40	$1,190.00
05/26/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	0.50	$400.00
05/26/26	MRL	Email correspondence with M. Moore regarding preparations for the K. McNally deposition.	0.30	$240.00
05/26/26	MRL	Email correspondence with the Foley team regarding the pretrial order for the confirmation hearing.	0.20	$160.00
05/26/26	NCW	Draft Debtor’s first motion in limine regarding evidentiary issues for the confirmation hearing.	1.60	$1,040.00
05/26/26	NCW	Legal analysis regarding plan confirmation issues.	1.70	$1,105.00
05/26/26	NMCG	Analyze C. Moore's expert report and P. Shields' expert report in preparation for upcoming depositions and prepare outline regarding the same (4.6); meeting with Foley team and C. Moore in connection with upcoming depositions to strategize for upcoming deposition (1.0); assist in preparations for P. Shields' expert deposition (3.7); correspond with Foley team regarding the same (1.0).	10.30	$8,497.50
05/26/26	SJM	Email to case team regarding open issues for plan supplement.	0.70	$647.50
05/26/26	SJM	Attention to confirmation schedule and related issues (1.1); review draft communication to client regarding same (.4).	1.50	$1,387.50
05/26/26	SJM	Analyze cases regarding limitation of insurer participation under Trust Insurance.	1.20	$1,110.00

05/26/26	SJM	Analyze issues related to real property to be used for plan, in preparation for meeting regarding trial evidence.	0.80	$740.00
05/26/26	SJM	Revise draft pretrial order.	1.60	$1,480.00
05/27/26	AMUE	Foley team meeting to strategize regarding trial.	3.50	$4,287.50
05/27/26	AMUE	Prepare for expert deposition of Chuck Moore.	6.20	$7,595.00
05/27/26	DBG	Prepare for deposition of P. Shields (3.0); take deposition of P. Shields (6.0); team strategy meeting (partial) (2.0).	11.00	$15,950.00
05/27/26	MCM	Participate in deposition of P. Shields, Committee financial expert, in connection with confirmation of Debtor's modified fourth amended plan (6.0); work on confirmation brief following deposition of K. McNally (1.2).	7.20	$7,560.00
05/27/26	MDL	Evaluate fair and equitable standard and facts of the case in conjunction with same.	0.20	$200.00
05/27/26	MDL	Email exchange with J. Hogan regarding Class 5 plan ballot.	0.10	$100.00
05/27/26	MDL	Email exchange with R. Manns (Norton Rose Fulbright) regarding RCC plan ballot.	0.10	$100.00
05/27/26	MR	Various telephone discussions with various counsel regarding vote on fourth amended plan (2.3); draft summary of discovery status in insurance coverage proceedings, in furtherance of privileged strategy matters relating to chapter 11 plan confirmation strategy (.3); attend strategy meeting with A. Uetz, M. Lee, D. Goroff, E. Ridley, M. Moore, S. Moses, N. McGuffey and M. Rofaeil regarding preparation for chapter 11 plan confirmation hearing (3.5).	6.10	$5,185.00
05/27/26	MRL	Email correspondence with A. Uetz regarding the deposition designations.	0.10	$80.00
05/27/26	MRL	Email correspondence with NERA regarding the expert deposition.	0.20	$160.00
05/27/26	MRL	Continue drafting the confirmation brief in support of the Debtor's plan.	3.40	$2,720.00
05/27/26	MRL	Analyze the transcript for the RCWC representative deposition.	0.30	$240.00

05/27/26	MRL	Revise the confirmation timeline for the Foley team.	0.40	$320.00
05/27/26	MRL	Email correspondence with S. Moses regarding revisions to the pretrial order.	0.60	$480.00
05/27/26	MRL	Call with NERA regarding the expert deposition.	0.10	$80.00
05/27/26	NCW	Continued legal analysis regarding plan confirmation issues.	3.40	$2,210.00
05/27/26	NMCG	Prepare for P. Shields' deposition (2.7); participate in P. Shields' deposition (6.0).	8.70	$7,177.50
05/27/26	SJM	Attend confirmation trial preparation meeting (partial).	3.10	$2,867.50
05/27/26	SJM	Multiple revisions to draft pretrial order.	0.70	$647.50
05/27/26	SJM	Revise draft pretrial order to address witness issues.	0.60	$555.00
05/27/26	SJM	Attention to trial logistics issues.	0.40	$370.00
05/27/26	SJM	Further revisions to draft pretrial order (.4); email to Committee regarding same (.1); email to client regarding same (.1).	0.60	$555.00
05/28/26	AMUE	Prepare for (1.8), attend (7.0) and debrief from (.2) C. Moore expert deposition.	9.00	$11,025.00
05/28/26	DBG	Defend C. Moore deposition (7.0); pre-deposition meeting with C. Moore and A. Uetz (.4); review materials for C. Moore deposition (.6); post-deposition meeting with C. Moore (.2); review substantive email from A. Uetz to M. Kemner regarding trial strategy (.2).	8.40	$12,180.00
05/28/26	JCH	Extensive formatting revisions to confirmation brief to repair corrupted document, including adding table of contents.	2.50	$1,050.00
05/28/26	MCM	Further work on confirmation brief and Daubert motions/motions in limine to be filed on June 4 per scheduling order (3.5); analysis of K. McNally and P. Shields depositions in connection with confirmation (2.0); analysis of legal research into confirmation standards (.6); additional revisions to confirmation brief (1.0).	7.10	$7,455.00

05/28/26	MRL	Revise the confirmation brief in support of the Debtor's plan.	0.70	$560.00
05/28/26	MRL	Analyze documents to make a production to the Committee.	0.60	$480.00
05/28/26	MRL	Email correspondence with NERA regarding preparations for the deposition.	0.20	$160.00
05/28/26	MRL	Email correspondence with M. Lee regarding the R. Rosen expert deposition.	0.20	$160.00
05/28/26	MRL	Draft a summary of certain expert deposition.	0.80	$640.00
05/28/26	NCW	Continue drafting Debtor's first motion in limine regarding evidentiary issues for the confirmation hearing.	3.10	$2,015.00
05/28/26	NCW	Prepare proposed orders regarding Debtor's first and second motions in limine.	0.90	$585.00
05/28/26	NCW	Prepare Debtor's second motion in limine regarding evidentiary issues for the confirmation hearing.	2.90	$1,885.00
05/28/26	NMCG	Strategize with Foley team regarding discovery motions in connection with confirmation hearing (.6); correspond with N. Walsh regarding the same (.2); assist in preparations with C. Moore deposition (.4); attend C. Moore deposition (partial) (5.5); begin trial exhibit list (.3); continue drafting discovery motions (1.5).	8.50	$7,012.50
05/28/26	SJM	Respond to creditor request for ballot.	2.00	$1,850.00
05/28/26	SJM	Analyze approach to real property requirements for plan.	1.40	$1,295.00
05/28/26	SJM	Call with D. Flanagan regarding approach to real estate collateral and other plan confirmation issues.	0.90	$832.50
05/29/26	AMUE	Prepare for trial (witness outlines).	4.50	$5,512.50

05/29/26	DBG	Analyze C. Moore rebuttal report (.7); communications with A. Uetz regarding MIL follow-up (.2); review LMI requests for admission (.3); preparation for oral argument regarding discovery dispute issue (1.0); review Committee member submissions regarding discovery dispute (.4); advise N. McGuffey regarding deposition notices (.2).	2.80	$4,060.00
05/29/26	JCH	Revise certain citations and add table of authorities to confirmation brief.	0.80	$336.00
05/29/26	JCH	Calendar dates of confirmation trial.	0.30	$126.00
05/29/26	MCM	Continue working on draft confirmation brief, incorporating deposition testimony and exhibits, and circulate same to Foley team for review.	5.00	$5,250.00
05/29/26	MRL	Continue revising the confirmation brief in support of the Debtor's plan to conform to M. Moore's comments.	2.40	$1,920.00
05/29/26	MRL	Draft questions for D. Martin in preparation for the deposition.	1.30	$1,040.00
05/29/26	MRL	Continue drafting a summary of certain expert deposition.	0.50	$400.00
05/29/26	MRL	Confer with M. Moore regarding revisions to the brief in support of the Debtor's plan.	0.20	$160.00
05/29/26	NCW	Legal analysis regarding evidentiary issues at confirmation hearing.	1.60	$1,040.00
05/29/26	NMCG	Draft motion in limine in connection with confirmation trial (5.3); analyze deposition transcript of P. Shields (.8); draft client summary for partner review (.8); assist in preparations for upcoming depositions (.6).	7.50	$6,187.50
05/29/26	SJM	Review Committee edits to pretrial order (.5); email to A. Uetz regarding approach to same (.3).	0.80	$740.00
05/29/26	WD	Cite check (facts and authorities) motion for new trial and supporting declaration and (proposed) order and prepare supporting exhibits.	3.80	$1,824.00

05/30/26	DBG	Conferences with N. McGuffey regarding motions in limine (.3); email with C. de Quesada regarding Committee experts (.2); review amended disclosure of fact witnesses by Committee (.2); review communications regarding Martens deposition (.1).	0.80	$1,160.00
05/30/26	MCM	Continue to build out confirmation brief following depositions of various parties and incorporating additional legal argument.	3.50	$3,675.00
05/30/26	MRL	Draft the deposition designations for the plan confirmation.	0.40	$320.00
05/30/26	MRL	Continue revising the confirmation brief in support of the Debtor's plan to conform to M. Moore's comments.	1.80	$1,440.00
05/30/26	NMCG	Draft various discovery motions in connection with confirmation (5.3); analyze case law regarding the same (.6); begin drafting motions to strike (1.2).	7.10	$5,857.50
05/31/26	DBG	Conference with N. McGuffey regarding motions in limine.	0.30	$435.00
05/31/26	MCM	Prepare for expert deposition of Dr. Martin on behalf of the Debtor in connection with confirmation.	1.50	$1,575.00
05/31/26	MCM	Additional work on brief in support of confirmation of Debtor's modified fourth amended plan.	2.00	$2,100.00
05/31/26	MRL	Email correspondence with the Foley team regarding preparation for the confirmation hearing.	0.30	$240.00
05/31/26	NMCG	Continue drafting discovery motions in connection with confirmation hearing.	3.10	$2,557.50
		Task Total:	586.80	$605,525.50

008 Communications with Client

05/01/26	MCM	Email and telephone communications with client parties regarding case filings and deadlines.	0.80	$840.00
05/04/26	MDL	Email exchange with client leadership regarding Archdiocese of New York settlement.	0.10	$100.00
05/04/26	MDL	Email exchange with M. Kemner regarding public statements on church sales and closures.	0.40	$400.00
05/06/26	MCM	Debrief with client parties following deposition of A. Bardos by insurers.	0.50	$525.00
05/07/26	MCM	Email and telephone communications with client parties regarding case status.	1.30	$1,365.00
05/08/26	AMUE	Communications with Bishop Barber regarding court hearing.	0.40	$490.00
05/11/26	AMUE	Prepare for and meet with M. Kemner regarding trial issues.	1.00	$1,225.00
05/12/26	AMUE	Review privileged communication with client relating to trial issue.	0.50	$612.50
05/12/26	MCM	Email correspondence with client parties regarding real estate development efforts.	0.40	$420.00
05/14/26	MCM	Email correspondence with client parties regarding case status.	0.30	$315.00
05/14/26	MDL	Correspondence with RCBO leadership regarding interim DIP order and funding of DIP facility (drafted e-mail this date, sent the following day).	0.10	$100.00
05/18/26	JCH	Email correspondence with A. Uetz regarding sample weekly email to client listing upcoming hearings and Zoom information.	0.20	$84.00
05/18/26	MDL	Email exchange with A. Bardos regarding DIP financing funding.	0.10	$100.00
05/19/26	AMUE	Revisions to client memorandum regarding privileged issue relating to trial.	0.50	$612.50
05/19/26	MCM	Email correspondence with client parties regarding analysis of other case outcomes (.5); conference call with A. Bardos regarding CCCEB issues (.4).	0.90	$945.00
05/19/26	SJM	Email to client regarding trial logistics and plan.	0.50	$462.50

05/20/26	AMUE	Revisions to client communication relating to discovery.	0.80	$980.00
05/20/26	AMUE	Communications with M. Kemner regarding Committee's objection to Debtor's plan.	0.80	$980.00
05/21/26	MCM	Revise draft communication to client regarding discovery issues in connection with confirmation of the modified fourth amended plan.	0.50	$525.00
05/22/26	MCM	Revise summary report to client parties.	0.50	$525.00
05/22/26	MDL	Revise communication to client leadership regarding detailed analysis of Committee objection and risk associated with same.	0.50	$500.00
05/22/26	NMCG	Draft client correspondence regarding privileged information.	0.50	$412.50
05/26/26	AMUE	Review communication received from M. Kemner and develop advice relating to Committee's objection to plan.	1.10	$1,347.50
05/26/26	MDL	Draft email to client leadership regarding potential resolution of CIGA exposure.	0.60	$600.00
05/26/26	MRL	Draft an email to the client regarding the upcoming hearings (.7); confer with S. Moses regarding the same (.3).	1.00	$800.00
05/26/26	SJM	Draft response to M. Kemner regarding analysis of and response to Committee objection.	1.10	$1,017.50
05/27/26	MDL	Draft correspondence to client leadership regarding best interest of creditors test and potential modifications to plan terms.	1.40	$1,400.00
05/27/26	MDL	Extended email exchange with client leadership regarding potential resolution with CIGA.	1.00	$1,000.00
05/28/26	AMUE	Revisions to memorandum to client leadership regarding privileged issue.	2.40	$2,940.00
05/28/26	MCM	Email correspondence with client parties regarding document collection in response to Committee requests.	0.50	$525.00
05/28/26	MCM	Meeting with client parties regarding RCC collateral and related issues for exit financing.	0.80	$840.00
05/29/26	AMUE	Finalize memorandum for client regarding privileged issue relating to confirmation.	2.20	$2,695.00

05/29/26	MCM	Email correspondence with client parties regarding CTN issues.	0.50	$525.00
		Task Total:	24.20	$26,209.00

012 Disclosure Statement

05/01/26	JCH	Run redline of first amended disclosure statement against solicitation version of disclosure statement (.2); finalize and file notice of filing of first amended disclosure statement (.2); finalize and file notice of filing of order approving first amended disclosure statement (.2); finalize and file notice of filing of revised forms of solicitation documents (.5).	1.10	$462.00
05/01/26	MCM	Revisions to first amended disclosure statement prior to filing same (1.3); conference call with M. Lee regarding disclosure statement issues (.3); meeting with M. Rofaeil regarding filings (.4); revisions to solicitation documents, including ballots and order, prior to filing (.8).	2.80	$2,940.00
05/01/26	MDL	Strategize with Foley team regarding adjustments to draft amended disclosure statement.	0.20	$200.00
05/01/26	MRL	Revise the disclosure statement to conform to the Foley's team comments (1.5); finalize to file the disclosure statement (.6).	2.10	$1,680.00
05/01/26	SJM	Revise draft solicitation documents including disclosure statement order.	1.50	$1,387.50
05/04/26	MRL	Analyze the LMI objection to the Debtor's disclosure statement.	0.20	$160.00
05/06/26	MCM	Review Committee filings regarding disclosure statement prior to hearing (.4); analysis of proposed language from Committee regarding solicitation order (.4).	0.80	$840.00
05/06/26	MDL	Draft summary of discussion with Lowenstein on plan confirmation issues.	0.40	$400.00
05/06/26	MDL	Strategize with Foley team regarding Committee's last-minute and needless challenge to order approving disclosure statement.	0.60	$600.00

05/08/26	JCH	Finalize and file solicitation version of first amended disclosure statement (.5); prepare redlines of first amended disclosure statement and proposed order (.2).	0.70	$294.00
05/08/26	MCM	Email correspondence with counsel for Committee regarding language revisions to order approving disclosure statement in connection with modified fourth amended plan (.5); revisions to disclosure statement based on outcome of hearing on same (.5); revisions to notice of forms and email correspondence with Committee counsel regarding same (.7); coordinate filing of solicitation version of first amended disclosure statement, submission of proposed order, and revised notice of forms with various ballots and other notices (1.0); analyze late-filed "supplemental objection" following conclusion of disclosure statement hearing (.4).	3.10	$3,255.00
05/11/26	MCM	Attention to solicitation issues following approval of Debtor's first amended disclosure statement in support of modified fourth amended plan.	2.10	$2,205.00
05/11/26	SJM	Review draft notice of non-voting status.	0.50	$462.50
05/12/26	MCM	Attention to solicitation issues following approval of Debtor's first amended disclosure statement in support of modified fourth amended plan.	0.90	$945.00
05/18/26	MCM	Email correspondence with Verita and Committee counsel confirming solicitation to abuse claimants.	0.30	$315.00
05/20/26	MCM	Analysis of first voting results in connection with Debtor's modified fourth amended plan.	0.30	$315.00
05/21/26	MCM	Email correspondence with various claimants to confirm service and receipt of ballots in connection with modified fourth amended plan.	0.30	$315.00
05/26/26	MCM	Analysis of Committee motion to designate certain votes, as well as response deadlines and proposed hearing on same.	0.60	$630.00
05/27/26	MCM	Work on issues in connection with Committee designation motion and attempt to strike certain claims.	0.50	$525.00

05/28/26	MCM	Work on issues in connection with Committee designation motion and attempt to strike certain claims.	0.50	$525.00
05/29/26	MCM	Analysis of designation motion and specific claims discussed therein.	0.50	$525.00
		Task Total:	20.00	$18,981.00

016 General Case Strategy (includes team calls)

05/01/26	MCM	Strategize regarding case status and confirmation of Debtor's modified fourth amended plan.	1.50	$1,575.00
05/04/26	MRL	Review pending dioceses cases to provide an update on their status to client.	1.50	$1,200.00
05/04/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	1.10	$880.00
05/06/26	TND	Provide information to A. Uetz on fees incurred in connection with state court trial.	0.30	$264.00
05/07/26	SJM	Calls with M. Lee regarding discovery issues and finalizing expert reports.	0.70	$647.50
05/07/26	SJM	Call with M. Moore regarding results of depositions, DIP financing, and related issues.	0.60	$555.00
05/07/26	TND	Provide to A. Uetz fee information on certain categories of fees incurred.	0.20	$176.00
05/08/26	AMUE	Meeting with M. Lee regarding hearing strategy.	0.50	$612.50
05/08/26	MDL	Draft summary of hearing for insurance coverage litigation team.	0.10	$100.00
05/08/26	MDL	Strategize with Foley team regarding selected use of quotations from bankruptcy court.	0.20	$200.00
05/08/26	MDL	Strategize with M. Moore and S. Moses regarding oral rulings on disclosure statement and DIP financing and next steps with respect to same.	0.30	$300.00
05/08/26	MDL	Strategize regarding witness order at confirmation hearing.	0.30	$300.00
05/08/26	SJM	Call with M. Lee regarding results of hearing.	0.40	$370.00
05/10/26	MRL	Review pending dioceses cases to provide an update on their status to client.	0.30	$240.00

05/11/26	MCM	Analysis of insurance issues with Foley team.	0.50	$525.00
05/11/26	MDL	Strategize with Foley team regarding trial witness order and evidentiary matters.	1.00	$1,000.00
05/11/26	MRL	Review email correspondence from A. Uetz regarding status of the confirmation hearing.	0.20	$160.00
05/11/26	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to client.	1.20	$960.00
05/11/26	NMCG	Analyze case precedent in connection with general case strategy (1.4); correspond with Foley team regarding privileged information (.4).	1.80	$1,485.00
05/12/26	AMUE	Analyze issue relating to lift stay cases and possible reassignment of certain cases.	0.80	$980.00
05/12/26	AMUE	Analyze JCCP 5108 proceedings to determine impact on confirmation proceedings, if any.	1.00	$1,225.00
05/12/26	MRL	Team meeting with M. Moore and N. Ortega regarding the deadlines in the case.	0.60	$480.00
05/13/26	MCM	Internal email correspondence regarding state court cases and JCCP selection process.	0.40	$420.00
05/13/26	MCM	Confer with Foley team regarding case status and strategy.	1.00	$1,050.00
05/13/26	MDL	Strategize with S. Moses regarding completion of DIP credit agreement for final approval order.	0.20	$200.00
05/13/26	MRL	Foley team call to prepare for the confirmation trial and the depositions.	1.50	$1,200.00
05/13/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.50	$400.00
05/13/26	NMCG	Meeting with Foley team to discuss confirmation and case strategy.	1.50	$1,237.50
05/13/26	SJM	Call with M. Lee regarding DIP financing and discovery issues.	0.40	$370.00
05/14/26	MDL	Strategize with Foley team regarding evidence to be entered via each witness during case-in-chief and dispute over Committee member depositions.	1.00	$1,000.00
05/14/26	MRL	Finalize summarizing daily docket activity and upcoming deadlines for client.	0.70	$560.00

05/14/26	SJM	Participate in meeting regarding strategy and approach to trial.	1.20	$1,110.00
05/15/26	AMUE	Communications with Foley team and R. Harris regarding proposed legislation relating to diocese bankruptcy filings.	0.50	$612.50
05/15/26	MDL	Email exchange with client leadership regarding Committee plan objection and insurer plan objections.	1.00	$1,000.00
05/15/26	MDL	Strategize with A. Uetz regarding plan confirmation trial evidence.	0.80	$800.00
05/18/26	AMUE	Analyze possible motions in limine.	1.50	$1,837.50
05/18/26	MRL	Review pending dioceses cases to provide an update on their status to client.	1.40	$1,120.00
05/18/26	SJM	Call with T. Dolcourt regarding vendor issues, confirmation legal research, and other case issues.	0.50	$462.50
05/18/26	TND	Respond to inquiry from A. Uetz on billing issues (.4); call with S. Moses on same and other case status matters (.4).	0.80	$704.00
05/19/26	AMUE	Prepare for (.4) and meeting with M. Lee and outside consultant relating to privileged security issue (.6).	1.00	$1,225.00
05/19/26	AMUE	Meeting with N. McGuffey and M. Rofaeil regarding privleged issue relating to trial preparation.	0.50	$612.50
05/19/26	MCM	Conference call with Foley team regarding motions in limine and similar relief.	0.80	$840.00
05/19/26	MDL	Strategize with Foley team regarding courtroom security matters during confirmation trial.	0.60	$600.00
05/19/26	MDL	Strategize with Foley team regarding courtroom security matters during confirmation trial.	0.30	$300.00
05/19/26	MRL	Call with N. McGuffey and A. Uetz regarding preparations for the confirmation trial.	0.30	$240.00
05/19/26	SJM	Call with A. Uetz and security consultant regarding security issues for trial.	0.60	$555.00
05/20/26	MCM	Analysis of call notes with client parties regarding state court posture and proceedings.	0.50	$525.00

05/21/26	MCM	Strategy meeting with Foley team regarding confirmation hearings.	1.40	$1,470.00
05/21/26	MDL	Participate in Foley team meeting regarding themes for plan confirmation hearing and order of evidence issues.	1.30	$1,300.00
05/21/26	MRL	Call with the Foley team regarding trial themes and exhibits.	1.40	$1,120.00
05/21/26	NMCG	Meeting with Foley team to discuss upcoming trial and confirmation strategy.	1.30	$1,072.50
05/26/26	AMUE	Meeting with M. Lee to prepare for trial (.4); follow up regarding same (.3).	0.70	$857.50
05/26/26	MDL	Strategize with A. Uetz regarding trial exhibits, expert witness preparation, and discovery negotiations.	0.40	$400.00
05/26/26	MRL	Email correspondence with A. Uetz regarding the weekly email to the client.	0.20	$160.00
05/27/26	MCM	Strategy meeting with Foley team regarding confirmation hearing and related issues (partial).	3.00	$3,150.00
05/27/26	MDL	Strategize with Foley team regarding form of testimony for case-in-chief witnesses and motions in liming (partial).	1.90	$1,900.00
05/27/26	MRL	Meeting with the Foley team regarding preparations for the confirmation hearing.	3.30	$2,640.00
05/27/26	NMCG	Foley team meeting to discuss trial strategy.	3.30	$2,722.50
05/28/26	MRL	Confer with N. Ortega and M. Moore regarding revisions to the brief in support of the Debtor's plan.	0.70	$560.00
05/29/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.70	$560.00
05/31/26	MRL	Review pending dioceses cases to provide an update on their status to client.	1.00	$800.00
		Task Total:	55.20	$51,929.00

017 Hearings and Court Matters

05/05/26	MCM	Prepare for hearings on Friday, May 8, regarding DIP approval and approval of Debtor's first amended disclosure statement.	1.00	$1,050.00
05/07/26	MCM	Prepare for hearings on approval of Debtor's first amended disclosure statement and interim DIP.	1.50	$1,575.00
05/08/26	MCM	Prepare for (.5) and participate in (1.0) status conference regarding approval of the first amended disclosure statement in support of modified fourth amended plan.	1.50	$1,575.00
05/08/26	MDL	Strategize with A. Uetz regarding potential resolutions of open issues on DIP financing and Committee's untimely discovery.	0.30	$300.00
05/08/26	MDL	Strategize with S. Moses and M. Moore regarding issues to be presented at hearing and possible compromises in advance of same.	1.10	$1,100.00
05/08/26	SJM	Attend hearing on disclosure statement and DIP financing.	1.00	$925.00
05/14/26	AMUE	Revisions to objections to ex parte applications.	0.50	$612.50
05/18/26	AMUE	Prepare for (.6) and attend (1.3) court conference relating to trial logistics; debrief memorandum regarding same (.3).	2.20	$2,695.00
05/18/26	SJM	Attend meeting with court regarding trial logistics (1.3); draft summary for client regarding same (.6).	1.90	$1,757.50
05/20/26	AMUE	Attend hearing on claims objections (partial).	1.50	$1,837.50
05/20/26	MCM	Prepare for (1.1) and participate in (1.4) hearing on first omnibus objection to late-filed and amended claims and status conference on scheduling for hearings in the week of June 8 prior to confirmation.	2.50	$2,625.00
05/20/26	MRL	Listen to a portion of the hearing on the claims objection.	0.40	$320.00
05/20/26	NMCG	Attend hearing in connection with claim objections (partial).	1.00	$825.00
05/20/26	SJM	Prepare for hearing on claim issues (.4); attend hearing (1.4).	1.80	$1,665.00

05/21/26	MCM	Confer with D. Goroff regarding hearing on joint discovery letter (.4); attend virtual hearing on joint discovery letter in connection with confirmation (.8).	1.20	$1,260.00
05/21/26	NMCG	Attend and take notes during hearing regarding discovery letter dispute (.8); follow up regarding same (.2).	1.00	$825.00
05/26/26	MRL	Participate in the K. McNally expert deposition.	3.90	$3,120.00
05/28/26	MRL	Participate in the R. Rosen expert deposition.	3.10	$2,480.00
05/29/26	DBG	Participate in claim objection hearing.	1.00	$1,450.00
		Task Total:	28.40	$27,997.50

018 Non-Bankruptcy Litigation

05/01/26	JRBL	Analysis of further accused party cases for trial per request of court.	3.30	$5,197.50
05/06/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	0.60	$600.00
05/07/26	AROU	Correspond with liaison counsel for institutional defendants regarding trial dates for cases set for trial.	0.30	$300.00
05/08/26	TFCA	Review update regarding insurance meeting from E. Ridley and respond.	0.30	$457.50
05/11/26	AROU	Strategize regarding draft JCCP 5108 case management conference statement.	0.20	$200.00
05/11/26	AROU	Strategize regarding JCCP 5108 plaintiffs' return to petition for writ of mandate regarding Proposition 51.	0.70	$700.00
05/11/26	JRDO	Strategize with attorney team on upcoming trials and conferring with plaintiffs' counsel on selecting cases to move forward.	0.40	$270.00
05/12/26	AROU	Strategize regarding JCCP 5108 cases involving accused party in preparation for meet and confer regarding setting additional bellwether cases for trial.	1.40	$1,400.00
05/12/26	AROU	Strategize regarding fact sheet responses for cases proposed by plaintiffs for trial setting.	0.90	$900.00

05/15/26	AROU	Strategize regarding accused party cases in JCCP 5108 and evaluate for inclusion as bellwethers for trial setting.	1.40	$1,400.00
05/15/26	JRBL	Analysis of additional cases for trial.	1.30	$2,047.50
05/15/26	TFCA	Review update regarding plan objection analysis.	0.30	$457.50
05/15/26	TFCA	Begin factual review of green-lighted cases.	0.50	$762.50
05/16/26	TFCA	Review case management statement draft from R. Simons and redline (.7); send to team for comments (.1).	0.80	$1,220.00
05/17/26	TFCA	Send redline regarding case management statement to R. Simons (.2); telephone call with R. Simons regarding same (.4).	0.60	$915.00
05/18/26	AROU	Call with trial team regarding potential JCCP 5108 cases involving accused party for potential trial setting as bellwethers.	1.00	$1,000.00
05/18/26	AROU	Strategize regarding accused party cases in JCCP 5108 and evaluate for inclusion as bellwethers for trial setting.	0.90	$900.00
05/18/26	KAFA	Call with team to discuss assessment of cases to offer for trial.	1.00	$480.00
05/18/26	MR	Attend strategy call with T. Carlucci, J. Blease, E. Ridley, A. Ouellette, and K. Farrar regarding privileged matters in connection with underlying state court litigation.	1.00	$850.00
05/18/26	TFCA	Attend team call regarding R. Simons' case selection matters (1.0); emails and telephone call with M. Kemner regarding settlement strategy (.5); continue review of accused party cases (1.5); review R. Simons' email to insurers (.2).	3.20	$4,880.00
05/19/26	AROU	Strategize regarding accused party cases in JCCP 5108 and evaluate as counter-proposals to the cases proposed by plaintiffs' liaison counsel as bellwethers for trial setting.	2.10	$2,100.00
05/19/26	AROU	Correspond with liaison counsel for the institutional defendants.	0.10	$100.00
05/19/26	ERR	Review potential cases for relief from stay per Judge Chatterjee's order.	1.00	$1,250.00

05/19/26	KAFA	Draft analysis summarizing 5 additional cases to propose for upcoming trials (3.9); review news articles regarding Diocese of Oakland settlements and church closures (.3).	4.20	$2,016.00
05/19/26	TFCA	Complete review of accused party list to prep for meeting (1.5); meet with E. Ridley and A. Ouellette regarding accused party list and discuss strategy regarding same (.3); emails regarding S. Moore selection regarding bankruptcy issues (.4).	2.20	$3,355.00
05/20/26	AROU	Strategize regarding next steps in JCCP 5108 and response to Judge Chatterjee's orders regarding setting additional accused party cases for trial.	1.90	$1,900.00
05/20/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	0.90	$900.00
05/20/26	AROU	Revise draft JCCP 5108 case management conference statement.	1.30	$1,300.00
05/20/26	MCM	Analysis of potential claims for selection/suggestion in coordinated proceeding before Judge Chatterjee.	0.40	$420.00
05/20/26	TFCA	Review case background materials (1.0); attend to strategy and communications regarding CMC and case inclusion (1.0); correspond with E. Ridley regarding insurance communication regarding CMC and post-trial motions (.5); respond to emails from insurers and draft responses to insurers (.5); emails with R. Simons regarding changes to CMC statement draft (.2); review changes from A. Ouellette regarding same (.2); draft email to client with cases from plaintiff (.2); discuss additional case with E. Ridley and A. Ouellette and review response from M. Lee regarding same (.5) review email from A. Uetz regarding settlement strategy options (.3).	4.40	$6,710.00
05/21/26	AROU	Strategize regarding JCCP 5108 joint case management conference statement.	0.10	$100.00
05/21/26	AROU	Revise draft case management conference statement specific to JCCP 5108 cases brought against The Roman Catholic Bishop of Oakland.	2.60	$2,600.00
05/21/26	JRBL	Assist with case analysis for selection per court.	2.20	$3,465.00

05/21/26	KAFA	Analysis of emails with insurers regarding remittitur and additional cases to go to trial (.4); prepare information regarding additional cases to recommend for trial (.3); prepare and transmit transcripts to insurers (.3).	1.00	$480.00
05/21/26	TFCA	Respond to CMC statement changes from R. Simons and follow up with call regarding same (.7); meet with E. Ridley to discuss same (.3); finalize CMC statement (.4); emails with E. Ridley regarding ranking for insurers regarding same (.5); review numerous responses from insurers (.6); finalize and file CMC statement (.2).	2.70	$4,117.50
05/22/26	KAFA	Analysis of multiple plaintiffs' and institutional defendants' joint case management statement and plaintiffs' and RCBO's joint case management statement.	0.40	$192.00
05/23/26	TFCA	Emails regarding R. Simons regarding case management conference (.2); follow up with Foley team (.1).	0.30	$457.50
05/26/26	AROU	Strategize regarding Travelers and Westport response to court's order to show cause in preparation for hearing.	0.30	$300.00
05/26/26	AROU	Strategize regarding non-party insurers' motion to intervene.	0.70	$700.00
05/26/26	AROU	Strategize regarding Continental Casualty's response to court's order to show cause in preparation for hearing.	0.20	$200.00
05/26/26	AROU	Strategize regarding Pacific Insurers' case management conference statement, objection to reconsideration of the court's November 5, 2025 order, and response to court's order to show cause.	0.40	$400.00
05/26/26	AROU	Prepare for case management conferences in JCCP 5108 and hearing regarding selection of RCBO cases for trial.	1.60	$1,600.00
05/26/26	TFCA	Prepare for case management conference (.3); review emails from team regarding insurers' filings (.2).	0.50	$762.50
05/27/26	AROU	Analyze JCCP 5108 cases involving other alleged perpetrators in preparation of submission to the court for potential bellwether trial setting.	2.40	$2,400.00

05/27/26	AROU	Strategize regarding takeaways following JCCP 5108 case management conference specific to the Roman Catholic Bishop of Oakland cases.	1.40	$1,400.00
05/27/26	AROU	Attend JCCP 5108 case management conference specific to the Roman Catholic Bishop of Oakland cases and order to show cause hearing.	3.00	$3,000.00
05/27/26	AROU	Attend JCCP 5108 case management conference.	0.40	$400.00
05/27/26	KAFA	Analysis of insurer filings including Pacific Insurers' case management statement, Pacific Insurers' supplemental response to OSC, CNA's response to continued OSC, non-party insurers' joint CMC statement, and Travelers and WIC response to continued OSC (.9); attend case management conference to set additional cases for trial and hearing on OSC (1.1); communications with team following hearing with Judge Chatterjee (.5); prepare information requested during hearing (.5); call with A. Ouellette to discuss analysis of cases for trial (.5).	3.50	$1,680.00
05/27/26	SJM	Attend JCCP status conference in order to monitor implications for bankruptcy case.	0.70	$647.50
05/27/26	TFCA	Prepare for case management conference (.4); review insurers' filings (.5); telephone call with E. Ridley regarding same (.2); attend hearing (.7); follow-up call with J. Blease, A. Ouellette and E. Ridley (.5); meet with E. Ridley and A. Ouellette regarding same (.3); draft email update to client (.4); emails and telephone call with M. Kemner (.4); review draft email to insurers (.2); review email response from insurer J. Chorley and emails with E. Ridley regarding same (.4).	4.00	$6,100.00
05/28/26	AROU	Analyze JCCP 5108 cases involving other alleged perpetrators in preparation of submission to the court for potential bellwether trial setting.	2.60	$2,600.00
05/28/26	TFCA	Emails regarding responding to insurers' requests (.4); search for emails to produce to insurers regarding CMC (.3).	0.70	$1,067.50
05/29/26	AROU	Analyze JCCP 5108 cases involving other alleged perpetrators in preparation of submission to the court for potential bellwether trial setting.	0.70	$700.00

05/29/26	AROU	Draft court-ordered case summaries and proffer for defendant's proposed accused party cases for bellwether trial setting.	2.90	$2,900.00
05/29/26	TFCA	Review response to insurers and provide edits (.4); review list of perpetrators and Excel spreadsheet and email team regarding same (.5).	0.90	$1,372.50
		Task Total:	74.80	$84,630.50

020 Retention/Billing/Fee Applications for Debtor Professionals

05/08/26	TND	Correspondence with J. Harrison regarding preparation of next interim fee application.	0.10	$88.00
05/11/26	JCH	Begin preparation of Foley ninth interim fee application (1.5); prepare draft of Foley monthly fee statement for April 2026 (.5).	2.00	$840.00
05/13/26	JCH	Prepare certificates of no objection to Foley and NERA March 2026 monthly fee statements.	0.50	$210.00
05/13/26	TND	Work on April fee statement to ensure compliance with U.S. Trustee guidelines.	1.40	$1,232.00
05/14/26	TND	Further work on April fee statement to ensure compliance with U.S. Trustee guidelines.	1.70	$1,496.00
05/15/26	TND	Further work on April fee statement to ensure compliance with U.S. Trustee guidelines.	0.20	$176.00
05/16/26	TND	Further work on April fee statement to ensure compliance with U.S. Trustee guidelines.	0.50	$440.00
05/18/26	JCH	File certificates of no objection to Foley and NERA March 2026 monthly fee statements.	0.20	$84.00
05/18/26	TND	Further work on April fee statement to ensure compliance with U.S. Trustee Guidelines.	0.80	$704.00
05/19/26	TND	Further work on April fee statement to ensure compliance with U.S. Trustee guidelines (.9); email with A. Uetz on same (.1).	1.00	$880.00
05/21/26	TND	Review question on April fee statement for Foley.	0.10	$88.00
05/28/26	TND	Review A&M fee statement for April (.1); email to A. Uetz on Foley fee statement question (.1).	0.20	$176.00

05/29/26	JCH	Finalize Foley April 2026 monthly fee statement (.5); file Foley, A&M and NERA monthly fee statements for April 2026 (.3).	0.80	$336.00
05/29/26	TND	Finalize Foley April Statement (1.6); email correspondence with I. Velikova on NERA application (.1); review NERA application (.1).	1.80	$1,584.00
05/30/26	TND	Send as-filed fee statements to I. Velikova (NERA) and N. Corbett (A&M).	0.10	$88.00
		Task Total:	11.40	$8,422.00

022 Retention/Fee Applications: Other Professionals

05/06/26	TND	Email correspondence with Judge Newsome on status of fee application approval order and next fee application.	0.10	$88.00
05/07/26	SJM	Prepare omnibus order on approval of fee applications.	0.90	$832.50
05/07/26	TND	Email correspondence with Judge Newsome regarding fee applications.	0.20	$176.00
05/08/26	TND	Email with Covington on draft order approving fees (.1); discuss mediator payment issue with S. Moses (.1).	0.20	$176.00
05/12/26	TND	Prepare overpayment letters for mediators Judge Newsome and T. Gallagher.	0.40	$352.00
05/13/26	SJM	Email to A. Bardos regarding professional fee payments for March.	0.50	$462.50
05/14/26	SJM	Analyze issue regarding Committee expense reimbursements.	0.30	$277.50
05/18/26	SJM	Email to client regarding payment of March professional fee statements.	0.50	$462.50
05/20/26	TND	Email with C. Syzmanski on next applications.	0.10	$88.00
05/26/26	SJM	Analysis of amounts payable under interim fee order (.8); email correspondence with D. Flanagan regarding same (.4).	1.20	$1,110.00

05/27/26	SJM	Email to client regarding payment of fee app catch-up amounts.	0.60	$555.00
		Task Total:	5.00	$4,580.00

025 U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating

05/11/26	EPK	Coordinate with J. Harrison regarding next week's monthly operating report filing deadline.	0.10	$100.00
05/18/26	EPK	Email correspondence with D. Flanagan of VeraCruz and A. Bardos of RCBO regarding preliminary draft of the April 2026 MOR (.1); review the preliminary MOR package (.4); provide comments to same to D. Flanagan and A. Bardos (.2).	0.70	$700.00
05/19/26	EPK	Review finalized MOR package for April 2026 reporting period (.1); email correspondence with D. Flanagan and A. Bardos regarding approval for filing and service of same this week (.2).	0.30	$300.00
05/27/26	EPK	Emails with D. Flanagan of VeraCruz and K. Farrar regarding the April MOR supplemental files for the BRG team.	0.10	$100.00
05/29/26	EPK	Emails with K. Farrar and D. Flanagan of VeraCruz regarding production of the April 2026 supplement MOR information to BRG.	0.10	$100.00
		Task Total:	1.30	$1,300.00

026 Unsecured Creditor Issues/Communications/Meetings

05/02/26	MCM	Conference call with B. Weisenberg regarding case issues.	0.50	$525.00
05/04/26	AMUE	Review communication received from Committee regarding discovery (.4) and provide advice regarding response (.3).	0.70	$857.50
05/05/26	MCM	Call with Committee counsel to discuss moving back voting deadline in connection with solicitation of Debtor's modified fourth amended plan (.4); email correspondence confirming agreement on dates (.2).	0.60	$630.00

05/05/26	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding possible stipulations relating to confirmation.	0.70	$700.00
05/06/26	MDL	Strategize with S. Moses regarding terms of DIP facility and negotiations with Committee regarding same.	0.50	$500.00
05/06/26	MDL	Email exchange with M. Kaplan (Lowenstein) regarding M. Babcock deposition testimony on feasibility.	0.10	$100.00
05/07/26	MCM	Email correspondence with Committee and insurance counsel regarding supplemental discovery requests.	0.50	$525.00
05/11/26	MCM	Email correspondence with Committee counsel regarding depositions and related issues on Committee experts and witnesses.	0.50	$525.00
05/12/26	MRL	Call with the Committee and Foley teams to discuss the supplemental discovery issues.	0.40	$320.00
05/14/26	MCM	Email correspondence with Committee counsel regarding prior solicitation round issues (.3); additional email correspondence regarding discovery issues (.3).	0.60	$630.00
05/14/26	MRL	Call with the Foley and Committee teams regarding the claim objections.	0.40	$320.00
05/21/26	MRL	Call with the Committee and Foley teams regarding the Committee's motion to compel discovery.	0.60	$480.00
05/26/26	MDL	Email correspondence to J. Bair (Burns Bair) regarding confidential settlement issue.	0.10	$100.00
05/26/26	SJM	Brief review of plan notice from Franciscan Friars bankruptcy to evaluate any implications for RCBO.	0.30	$277.50
05/27/26	MDL	Multiple communications with counsel for individual Class 4 claim holders regarding potential support for chapter 11 plan.	1.50	$1,500.00
05/28/26	MDL	Telephone conference with J. Hogan regarding Class 5 vote in support of the plan and testimony at plan confirmation hearing.	0.20	$200.00
		Task Total:	8.20	$8,190.00

027 Real Estate and Real Property Issues

05/05/26	MRL	Confer with M. Lee regarding the appraisal of certain properties.	0.10	$80.00
05/05/26	MRL	Analyze documents regarding the appraisals for certain properties.	0.40	$320.00
05/05/26	MRL	Analyze the sale orders in the case (.3); email correspondence with M. Lee regarding the same (.3).	0.60	$480.00
		Task Total:	1.10	$880.00

028 Tort Claims

05/01/26	KAFA	Update spreadsheet of accused party cases.	0.20	$96.00
05/12/26	KAFA	Review amended notice of adoption forms for plaintiffs John Doe P.A. and John Doe D.R. (.5); research and summarize for team the 5 accused party cases proposed by R. Simons to go to trial (1.0); pull Clergy III insurance settlement information for M. Rofaeil (.2).	1.70	$816.00
05/13/26	KAFA	Review E. Ridley analysis and update regarding state litigation and communication with insurers (.3); research new John JD Doe case (.4).	0.70	$336.00
05/15/26	KAFA	Prepare and transmit fact sheets and proofs of claim for additional accused party cases for consideration for trial.	1.10	$528.00
05/28/26	KAFA	Prepare information and documentation requested by M. Rofaeil regarding Committee's supplemental discovery requests (.9); analysis of letter from J. Chorley to RCBO regarding case selection and communications from team regarding same (.3); prepare spreadsheet tallying all claims by perpetrator (.8); prepare timelines and summaries of certain perpetrators (2.0); prepare case severity analyses for certain perpetrators (2.0); prepare CMC statement emails to attach to response to J. Chorley May 27 letter (.8); prepare April 2026 MOR supplemental documents for production to Committee (.6).	7.40	$3,552.00

05/29/26	KAFA	Prepare timelines and summaries of certain perpetrators (3.3); prepare case severity analyses for certain perpetrators (3.6); finalize production of April 2026 MOR supplemental documents to Committee (.3).	7.20	$3,456.00
		Task Total:	18.30	$8,784.00

029 Non-tort Proofs of Claim

05/06/26	SJM	Analyze non-tort proofs of claim and prior Class 3 voting report.	1.60	$1,480.00
		Task Total:	1.60	$1,480.00

030 Insurance Issues (other than coverage)

05/12/26	MCM	Review email correspondence regarding insurer request to participate in Committee member depositions.	0.30	$315.00
05/13/26	MCM	Review email correspondence with insurers regarding state court status and follow-up from same.	0.50	$525.00
05/19/26	MCM	Email correspondence with counsel for certain insurers regarding potential stipulation on authentication of insurance policies (.3); analysis of same (.3).	0.60	$630.00
05/20/26	MCM	Email correspondence with insurer counsel regarding confirmation issues (.3); analysis of LMI's requests for admission (.4).	0.70	$735.00
05/21/26	MCM	Work on issues in connection with requested ratification of certain insurance policies in connection with confirmation.	1.00	$1,050.00
		Task Total:	3.10	$3,255.00

031 Insurance Issues (coverage, includes adversary proceeding)

05/01/26	ERR	Review request for production from CNA.	0.50	$625.00
05/01/26	ERR	Review edits to joint statement and finalize for filing.	2.00	$2,500.00
05/01/26	MDL	Strategize with Foley and Covington teams regarding revisions to joint status report for insurance adversary proceeding.	0.30	$300.00
05/01/26	MDL	Revise joint status report for insurance adversary proceeding.	0.30	$300.00
05/01/26	MR	Draft multiple revisions to, finalize, and coordinate filing of joint status report ordered for filing by Judge Corley in insurance coverage action, per internal edits and comments and per additions from insurers (2.2); attend strategy call with H. Johnson regarding privileged discovery matters in insurance coverage action (.8).	3.00	$2,550.00
05/01/26	SJM	Revise draft joint status update regarding bankruptcy status and issues.	0.90	$832.50
05/04/26	AMUE	Analyze insurance assignment issue relating to plan confirmation.	1.20	$1,470.00
05/04/26	ERR	Review additional search regarding state court trial communications.	0.50	$625.00
05/04/26	ERR	Review issues to be coordinated regarding upcoming CMC.	0.50	$625.00
05/04/26	ERR	Review order by court regarding CMC hearing.	0.50	$625.00
05/04/26	ERR	Review edited plan wording regarding non-abuse federal policies.	0.30	$375.00
05/04/26	MR	Coordinate collection of communications requested for production by insurers (.2); coordinate drafting of pro hac vice application in insurance coverage action (.2); communications with E. Ridley regarding privileged strategy matters relating to insurance coverage action (.2).	0.60	$510.00
05/04/26	TND	Review status of reimbursements from Travelers.	0.30	$264.00
05/06/26	AROU	Strategize regarding arguments to raise at May 8 discovery hearing.	0.70	$700.00

05/06/26	ERR	Review status of additional production and information regarding state court case.	1.00	$1,250.00
05/06/26	MCM	Conference call regarding preparation for case management conference in coverage action.	0.80	$840.00
05/06/26	MR	Coordinate supplemental production of documents requested by counsel for insurers (.2); draft privileged attorney work product materials in preparation for May 8, 2026 hearing before Judge Corley in insurance coverage action (.5); obtain certificate of good standing from Illinois bar, and finalize and file pro hac vice application in insurance coverage action (.5); further email communications regarding privileged strategy matters in preparation for May 8th hearing before Judge Corley (.3); telephone call with A. Ouellette regarding same (.4).	1.90	$1,615.00
05/06/26	MRL	Email correspondence with the Foley team regarding the expert reports.	0.40	$320.00
05/06/26	TND	Prepare detailed email bill submission and reimbursement requests to Travelers for amounts expended during the state court trial.	0.70	$616.00
05/07/26	AMUE	Analyze privileged issue relating to insurer discovery and provide advice regarding same.	1.00	$1,225.00
05/07/26	ERR	Edit submittal regarding status of costs regarding insurance litigation.	0.70	$875.00
05/07/26	ERR	Review insurers' appeal regarding motion for relief of stay.	0.50	$625.00
05/07/26	ERR	Prepare for discovery hearing before Judge Corley.	1.00	$1,250.00
05/07/26	MCM	Conference call with insurance team to discuss case management conference in insurance coverage action.	0.60	$630.00

05/07/26	MR	Attend strategy call with E. Ridley, M. Moore, C. Haskett and D. Goodwin regarding privileged strategy matters in advance of May 8, 2026 hearing before Judge Corley in insurance coverage action (.6); follow-up call with E. Ridley regarding same (.4); final preparations for May 8, 2026 hearing in insurance coverage action, including completion of privileged attorney work product materials regarding discovery disputes (1.2).	2.20	$1,870.00
05/08/26	ERR	Prepare for and attend case management and discovery hearing before Judge Corley.	6.50	$8,125.00
05/08/26	MDL	Strategize with Foley team regarding plan language for non-abuse litigation policies proposed by Chubb entities.	0.30	$300.00
05/08/26	MDL	Email exchange with J. Bonteque (Duane Morris) regarding stipulation for extension of time to object to plan confirmation.	0.10	$100.00
05/08/26	MDL	Telephone conference with J. Bonteque (Duane Morris) regarding proposed plan language and stipulation for extension of time to object to plan confirmation.	0.20	$200.00
05/08/26	MDL	Revise plan language regarding non-abuse litigation policies proposed by Chubb entities.	0.50	$500.00
05/08/26	MR	Complete preparations for and attend in-person hearings and court-mandated in-person meet and confer discussions with insurers' counsel in insurance coverage action (7.5); email communications regarding privileged matters in follow up to same (.6).	8.10	$6,885.00
05/08/26	TND	Email with E. Ridley on submission to Travelers (.1); review invoices to ensure all expenses submitted (.2).	0.30	$264.00
05/11/26	AMUE	Review supplemental brief filed by insurers and outline motion relating to same.	0.80	$980.00
05/11/26	ERR	Review stipulation regarding amended complaint and edits thereto.	0.70	$875.00
05/11/26	ERR	Review court order regarding discovery disputes and case management.	0.50	$625.00

05/12/26	AMUE	Revise communication to insurers regarding discovery.	0.50	$612.50
05/12/26	MDL	Analyze summary of discussion with insurers' counsel regarding state court verdict and possible appellate issues.	0.10	$100.00
05/13/26	MR	Analyze Pacific insurers' second set of requests for production in insurance coverage action, and communicate with H. Johnson regarding privileged strategy matters in relation to same.	1.20	$1,020.00
05/14/26	ERR	Review insurer appeal regarding order lifting stay as well as submittals by insurers regarding bankruptcy plan.	1.50	$1,875.00
05/14/26	ERR	Review information regarding accused party cases regarding coverage.	1.00	$1,250.00
05/14/26	ERR	Briefly review bankruptcy filings regarding plan from insurers.	1.00	$1,250.00
05/14/26	ERR	Edit revised sixth amended complaint.	1.50	$1,875.00
05/14/26	ERR	Telephone call with counsel regarding issues related to accused party and coverage issues.	0.80	$1,000.00
05/15/26	AMUE	Communications with Foley team regarding privileged issue relating to insurer expert.	0.80	$980.00
05/15/26	ERR	Review insurers' objections regarding Debtor's plan.	1.00	$1,250.00
05/15/26	ERR	Review insurers' appeal on order regarding motion for relief from stay.	0.50	$625.00
05/17/26	ERR	Review potential claims for selection of cases for trial.	2.00	$2,500.00
05/17/26	ERR	Review response to insurers' position regarding stipulation and response to amended complaint.	0.50	$625.00
05/17/26	ERR	Review communications regarding bankruptcy hearing and insurers' responses.	0.50	$625.00
05/18/26	ERR	Review status of confirmation hearing.	1.00	$1,250.00
05/18/26	ERR	Begin review of motions regarding insurers.	1.00	$1,250.00
05/18/26	ERR	Review materials regarding potential claims to be subject to lift of stay and analysis of insurance coverage.	2.00	$2,500.00

05/18/26	MR	Review prior correspondence with counsel for insurers, in furtherance of privileged strategy considerations in insurance coverage action (.3); telephone call with E. Ridley regarding same (.2); revise draft of responses and objections to Pacific insurers' second set of RFPs in insurance coverage action (1.3).	1.80	$1,530.00
05/19/26	ERR	Review court order regarding sixth amended complaint and briefing schedule.	0.50	$625.00
05/19/26	ERR	Review potential settlement regarding CIGA.	0.50	$625.00
05/19/26	ERR	Review notices of appeal regarding relief from stay order to 9th Circuit by insurers.	0.50	$625.00
05/19/26	MR	Revise drafts of interrogatory and RFA answers in insurance coverage action.	1.30	$1,105.00
05/20/26	ERR	Edit responses to interrogatories and admissions.	2.00	$2,500.00
05/20/26	ERR	Review insurer communications and draft response thereto regarding case management statement and selection of cases for relief from stay.	1.00	$1,250.00
05/20/26	ERR	Review appeal documents including mediation statements regarding relief from stay.	0.50	$625.00
05/20/26	ERR	Review issues regarding pending bankruptcy trial as well as potential resolutions.	1.00	$1,250.00
05/20/26	ERR	Review potential cases for submittal to court per court order and issues regarding coverage.	2.50	$3,125.00
05/20/26	KAFA	Prepare CIGA claim submission information for E. Ridley.	0.30	$144.00
05/20/26	MDL	Strategize with E. Ridley regarding potential settlement with CIGA.	0.20	$200.00
05/20/26	MR	Complete review of draft responses to RFAs received from Pacific Indemnity in insurance coverage action (.6); strategize with E. Ridley regarding privileged strategy matters in insurance coverage action (.4); review documents for potential production in response to insurers' request for supplemental production of John Doe OK 1022-related materials (.8); perform research and case law analysis in furtherance of privileged strategy matters in insurance coverage action (.9).	2.70	$2,295.00

05/20/26	SJM	Review discovery responses for insurance coverage litigation in order to address bankruptcy issues.	0.70	$647.50
05/21/26	ERR	Respond to emails from insurers regarding appeal and post-trial activities regarding state court case.	1.50	$1,875.00
05/21/26	ERR	Edit notice of appeal regarding state court case and case management statement vis a vis insurance issues.	1.50	$1,875.00
05/21/26	MDL	Strategize with Foley team regarding CIGA exposure and possible resolution of same.	0.10	$100.00
05/21/26	MDL	Revise email to carrier counsel regarding state court cases and remittitur option.	0.20	$200.00
05/21/26	MR	Email communications with internal Foley case team regarding various insurer requests, demands and communications relating to insurance coverage action.	0.50	$425.00
05/22/26	KAFA	Analysis of communications from insurers regarding post-trial motions, remittitur, and strategy for upcoming trials.	0.20	$96.00
05/22/26	MDL	Strategize with Foley team regarding possible resolution of CIGA coverage liability.	0.20	$200.00
05/22/26	MDL	Email exchange with F. Hall (Black Compean & Hall) regarding possible resolution of CIGA coverage liability.	0.10	$100.00
05/26/26	AMUE	Analyze privileged issue relating to insurance (.5); communication with E. Ridley regarding same (.4); meeting with E. Ridley and C. Moore regarding same (.5).	1.40	$1,715.00
05/26/26	ERR	Review filings by insurers regarding case mangement conference and OSC hearings.	2.00	$2,500.00
05/26/26	ERR	Telephone conference with counsel for CIGA regarding settlement potential.	0.70	$875.00
05/26/26	ERR	Review mediation schedule per appellate court.	0.50	$625.00
05/26/26	ERR	Prepare for case management conference and OSC hearings.	1.00	$1,250.00
05/26/26	ERR	Review filing of mediation statements in appeal regarding relief from stay order.	0.50	$625.00

05/26/26	MDL	Telephone conference with F. Hall (Black Compean & Hall) and E. Ridley regarding potential resolution of CIGA exposure (partial).	0.50	$500.00
05/26/26	MDL	Strategize with E. Ridley regarding potential resolution of CIGA exposure.	0.20	$200.00
05/26/26	SJM	Evaluate issues relating to insurer demands to authenticate policies (.7); email to E. Ridley regarding same (.3).	1.00	$925.00
05/27/26	ERR	Review letter from Chubb regarding communications.	0.50	$625.00
05/27/26	ERR	Review issues regarding potential settlement with CIGA and related insurance issues.	0.80	$1,000.00
05/27/26	ERR	Edit brief for new trial.	1.00	$1,250.00
05/27/26	ERR	Attend pretrial preparation regarding bankruptcy plan confirmation (regarding insurance issues).	2.00	$2,500.00
05/27/26	ERR	Prepare for and attend JCCP CMC and OSC hearings.	3.00	$3,750.00
05/27/26	ERR	Create report email to insurers regarding identification of state cases to be tried.	0.50	$625.00
05/28/26	ERR	Review letter from J. Chorley regarding case management statement and create response thereto.	1.50	$1,875.00
05/28/26	ERR	Review J. Chorley letter regarding case identification.	0.50	$625.00
05/28/26	ERR	Edit brief for new trial/remittitur.	1.50	$1,875.00
05/29/26	ERR	Edit response to J. Chorley (Chubb) regarding state case selection.	1.00	$1,250.00
05/29/26	ERR	Review appellate filings by insurers regarding relief from stay.	0.50	$625.00
05/29/26	ERR	Review strategy regarding potential CIGA resolution.	0.50	$625.00
05/29/26	MDL	Email exchange with M. Kemner and Covington counsel regarding CIGA exposure.	0.20	$200.00

05/29/26	MR	Communications with E. Ridley regarding privileged strategy matters in relation to insurance coverage action (.4); review documents for potential production to insurers, per insurers' requests in connection with insurance coverage action (.6).	1.00	$850.00
05/31/26	MDL	Strategize with Foley team regarding language in confirmation order on non-abuse insurance policies.	0.10	$100.00
		Task Total:	99.50	$111,266.50

032 Rule 2004 Motions/Discovery/Subpoenas

05/01/26	MCM	Prepare for 30(b)(6) deposition of A. Bardos at request of certain insurers.	1.00	$1,050.00
05/01/26	MDL	Telephone conference with C. Moore and S. Levitt (both of A&M) to discuss their updated expert report and liquidation analysis.	0.50	$500.00
05/01/26	SJM	Respond to insurer meeting-and-confer email.	0.70	$647.50
05/03/26	MCM	Prepare for deposition of A. Bardos as RCBO 30(b)(6) representative at request of certain insurers.	1.00	$1,050.00
05/04/26	MCM	Strategize with N. McGuffey regarding discovery matters.	0.30	$315.00
05/04/26	MDL	Participate in conference with A&M (S. Levitt, C. Moore), D. Goroff, VeraCruz, and P. Bongiovanni regarding real estate sale sequencing and liquidation and feasibility analyses.	0.70	$700.00
05/04/26	MDL	Email exchange with A. Zimmerman (Hilco) regarding updated real estate liquidation analysis.	0.10	$100.00
05/04/26	MRL	Correspondence with N. McGuffey regarding subpoenas in the case.	0.30	$240.00
05/05/26	KAFA	Update index of additional documents produced in bankruptcy matter.	0.20	$96.00
05/05/26	MCM	Preparation for A. Bardos deposition as RCBO's 30(b)(6) representative at request of certain insurers in meeting with A. Bardos, D. Goroff, and E. Ridley.	1.00	$1,050.00

05/05/26	SJM	Analyze approach to response to insurer email regarding production of communications.	0.30	$277.50
05/06/26	MCM	Prepare for and participate in deposition of A. Bardos as Debtor's 30(b)(6) at request of certain insurers.	6.00	$6,300.00
05/06/26	MDL	Evaluate Committee late-served discovery requests and possible motions to prohibit same.	0.20	$200.00
05/06/26	MDL	Strategize with A. Uetz regarding Hilco liquidation valuation and impact of same on A&M expert report.	0.40	$400.00
05/06/26	MDL	Strategize with Foley team regarding post-conversion litigation expenses.	0.90	$900.00
05/06/26	MDL	Telephone conference with A. Zimmerman regarding update to liquidation analysis.	0.10	$100.00
05/06/26	MRL	Draft the Debtor's motion for protective order for supplemental discovery requests (.4); email correspondence with M. Lee regarding the same (.1).	0.50	$400.00
05/06/26	SJM	Brief review of newly received deposition transcripts.	0.20	$185.00
05/07/26	JCH	Download transcript and exhibits from deposition of Bishop Barber.	0.30	$126.00
05/07/26	MCM	Collection efforts with respect to various requests for production.	0.50	$525.00
05/07/26	MDL	Revise draft motion for protective order against Committee's late discovery requests.	1.00	$1,000.00
05/07/26	MDL	Provide instruction for M. Rofaeil regarding motion for protective order against Committee's late discovery requests.	0.30	$300.00
05/07/26	MDL	Analyze Committee's late discovery requests.	0.30	$300.00
05/07/26	MDL	Email exchange with Lowenstein regarding late discovery requests.	0.50	$500.00
05/07/26	MDL	Email correspondence with insurer and Committee counsel regarding extension of expert report production deadline.	0.20	$200.00
05/07/26	MDL	Strategize with Foley team regarding action to block Committee's late discovery requests.	0.50	$500.00

05/07/26	MRL	Confer with M. Lee regarding the motion for protective order.	0.30	$240.00
05/07/26	MRL	Continue drafting the Debtor's motion for protective order for supplemental discovery requests.	2.70	$2,160.00
05/07/26	SJM	Email to counsel for certain insurers regarding production of emails.	0.30	$277.50
05/07/26	SJM	Analyze approach to Committee's untimely discovery (.4); review applicable local rules regarding same (.4); email to M. Lee and M. Rofaeil regarding approach to responses to same (.3).	1.10	$1,017.50
05/07/26	SJM	Email to Committee counsel regarding continuance of deadline for production of expert reports.	0.20	$185.00
05/07/26	SJM	Review stipulation to continue insurer deadline for objection.	0.40	$370.00
05/07/26	SJM	Final review of multiple expert reports for production to Committee.	0.80	$740.00
05/08/26	MDL	Strategize with Foley team regarding proposed compromise with LMI on scope of Debtor-Committee discovery communications.	0.30	$300.00
05/08/26	MDL	Telephone conference with C. Moore (A&M) regarding expert report and options for scheduling his deposition.	0.10	$100.00
05/08/26	MDL	Evaluate strategy for negotiating and resolving discovery dispute with Committee.	0.10	$100.00
05/08/26	MDL	Email exchange with M. Kaplan (Lowenstein) regarding tolling of discovery response deadline pending meet and confer.	0.30	$300.00
05/08/26	MDL	Email exchange with C. Moore (A&M) regarding options for scheduling his deposition.	0.20	$200.00
05/08/26	MRL	Email correspondence with M. Lee regarding the motion for protective order.	0.20	$160.00
05/08/26	SJM	Work on production of expert reports to Committee counsel.	2.70	$2,497.50
05/11/26	KAFA	Review amended notice of adoption form for plaintiff (.2) and notice of adoption form (.2).	0.40	$192.00

05/11/26	MDL	Analyze Committee late-served discovery requests in advance of meet and confer with Committee.	1.30	$1,300.00
05/11/26	MDL	Email exchange with M. Kaplan (Lowenstein) regarding meet and confer between Debtor and Committee over late-filed discovery requests.	0.10	$100.00
05/11/26	MDL	Strategize with Foley team regarding expert witness discovery and rebuttal reports.	1.00	$1,000.00
05/11/26	SJM	Analyze approach to searching emails for documents responsive to insurer requests.	0.80	$740.00
05/11/26	SJM	Review expert reports (1.2); draft email to client regarding same (.4); email to C. Moore regarding same (.2); email to Hilco regarding same (.2).	2.00	$1,850.00
05/11/26	SJM	Initial review of Currier and Gies deposition transcripts.	0.90	$832.50
05/12/26	MCM	Discovery meet and confer regarding confirmation hearings with Committee and insurers.	0.50	$525.00
05/12/26	MDL	Strategize with D. Goroff regarding expert depositions.	0.10	$100.00
05/12/26	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding compromise on late-served discovery requests.	0.30	$300.00
05/12/26	MDL	Participate in meet and confer with Committee counsel.	0.40	$400.00
05/13/26	MDL	Strategize with S. Moses regarding response to insurers on production of communications between Debtor and Committee in 2026.	0.10	$100.00
05/13/26	SJM	Analyze approach to insurer discovery and agreement with insurers to review communications with Committee (.7); email to B. Aton confirming agreement on same (.2).	0.90	$832.50
05/14/26	MCM	Analysis of discovery issues vis-a-vis Committee voting, process, and deliberations.	0.50	$525.00
05/14/26	MDL	Strategize regarding position on Committee member depositions.	0.20	$200.00

05/15/26	MCM	Strategize with D. Goroff regarding motion to compel depositions of Committee members and related issues (.5); revise motion to compel prior to filing (.6).	1.10	$1,155.00
05/17/26	MRL	Email correspondence with the Foley team regarding the discovery deadlines.	0.20	$160.00
05/19/26	JCH	File joint letter from Debtor and the Committee regarding discovery disputes.	0.20	$84.00
05/19/26	MDL	Strategize with S. Moses regarding Committee motion to compel Debtor responses to discovery requests.	0.20	$200.00
05/19/26	MRL	Email correspondence with the Foley team regarding the supboenas.	0.20	$160.00
05/19/26	MRL	Draft the Debtor's opposition to the Committee's motion to compel discovery.	0.80	$640.00
05/19/26	SJM	Review past productions regarding restricted assets.	0.40	$370.00
05/19/26	SJM	Respond to insurer counsel regarding expert reports.	0.20	$185.00
05/19/26	SJM	Analyze approach to Committee motion to compel (1.4); strategize with M. Lee regarding same (.2); email to team regarding approach (.2).	1.80	$1,665.00
05/20/26	MRL	Continue drafting the Debtor's opposition to the Committee's motion to compel discovery.	1.50	$1,200.00
05/20/26	SJM	Call with M. Kaplan regarding Committee motion to compel (.1); email regarding confirming time for same (.1).	0.20	$185.00
05/20/26	SJM	Brief review of insurer RFAs.	0.20	$185.00
05/20/26	SJM	Email correspondence with case team regarding approach to Committee motion to compel and upcoming discovery issues.	0.30	$277.50
05/20/26	SJM	Respond to emails regarding remote access for deposition.	0.40	$370.00
05/21/26	MCM	Meet and confer with Committee counsel regarding outstanding discovery matters.	0.60	$630.00
05/21/26	MDL	Communication exchange with K. Martens regarding expert reports and deposition.	0.20	$200.00

05/21/26	MDL	Coordination of supplemental document production with Foley team.	0.10	$100.00
05/21/26	MDL	Participate in meet and confer with Lowenstein regarding alleged deficiencies in Debtor's written discovery requests.	0.50	$500.00
05/21/26	MDL	Prepare for meet and confer with Lowenstein regarding alleged deficiencies in Debtor's written discovery requests.	0.20	$200.00
05/21/26	MDL	Email exchange with M. Kaplan (Lowenstein) regarding compromise on Debtor's response to second sets of discovery requests.	0.70	$700.00
05/21/26	MRL	Draft the Debtor's responses to the Committee's supplemental discovery requests.	2.50	$2,000.00
05/21/26	SJM	Initial review of emails for supplemental production.	1.20	$1,110.00
05/21/26	SJM	Attention to issues regarding expert rebuttal reports and finalizing same.	0.70	$647.50
05/21/26	SJM	Prepare for meet and confer call with Committee (.4); attend meet and confer call (.5).	0.90	$832.50
05/21/26	SJM	Review rebuttal expert reports and compile for production (.6); email to counsel producing same (.2).	0.80	$740.00
05/21/26	SJM	Email correspondence with T. Schiavoni regarding expert depositions.	0.60	$555.00
05/22/26	MRL	Continue drafting the Debtor's responses to the Committee's supplemental discovery requests.	1.90	$1,520.00
05/22/26	SJM	Review emails for supplement document production to insurers.	2.40	$2,220.00
05/25/26	MRL	Email correspondence with the Foley team regarding the status of the discovery requests.	0.30	$240.00
05/26/26	KAFA	Review new production made to insurers and update index of post-bankruptcy productions.	0.20	$96.00
05/26/26	MDL	Prepare for expert deposition of R. Rosen (Stout).	1.50	$1,500.00
05/27/26	MDL	Prepare for R. Rosen deposition.	0.50	$500.00

05/27/26	MDL	Provide instruction to M. Rofaeil regarding finalization of RCBO's responses to Committee's second set of discovery requests.	0.20	$200.00
05/27/26	MDL	Revise draft responses to Committee's second set of discovery requests.	1.40	$1,400.00
05/27/26	MRL	Draft an email to the Foley team regarding the status of discovery requests.	0.80	$640.00
05/27/26	SJM	Analyze transcript of RCWC deposition in order to address claim by Committee regarding amount of unrestricted assets.	0.70	$647.50
05/28/26	MDL	Prepare for R. Rosen deposition.	2.40	$2,400.00
05/28/26	MDL	Depose R. Rosen.	3.50	$3,500.00
05/28/26	MRL	Revise the Debtor's responses to the Committee's supplemental discovery requests to conform to M. Lee's comments.	1.10	$880.00
05/28/26	SJM	Draft email to M. Kaplan regarding confirmation of agreement on discovery.	0.70	$647.50
05/29/26	MDL	Multiple telephone conferences with K. Martens regarding deposition preparation and potential dates for same.	0.30	$300.00
05/29/26	MRL	Continue revising the Debtor's responses to the Committee's supplemental discovery requests to conform to M. Lee's comments.	0.50	$400.00
05/29/26	MRL	Continue analyzing documents to make a production to the Committee.	0.30	$240.00
05/29/26	SJM	Review Committee letter regarding confidentiality designations (.2); email to team regarding approach to same (.2).	0.40	$370.00
05/30/26	MRL	Draft a Daubert motion to exclude K. McNally's expert report.	2.40	$1,920.00
05/31/26	MRL	Continue revising the Debtor's responses to the Committee's supplemental discovery requests to conform to M. Lee's comments.	0.50	$400.00
05/31/26	MRL	Continue drafting a Daubert motion to exclude K. McNally's expert report.	1.00	$800.00
		Task Total:	76.90	$71,479.00

034 Other Motion Practice

05/06/26	JCH	Prepare and file notice of hearing on motion for DIP financing.	0.70	$294.00
05/11/26	JCH	Prepare draft motion to strike Pacific Insurers' supplemental objection to disclosure statement and proposed order.	0.50	$210.00
05/14/26	JCH	Prepare draft notice of hearing on Debtor's motion to strike supplemental objection (.3); prepare draft proposed order and notice of hearing on motion to compel deposition testimony (.5); minor revisions to motion to compel and declaration in support (.2); finalize and file Debtor's combined response to ex parte applications, motion to strike Pacific insurers' response, notice of hearing and motion to compel deposition testimony and declaration in support (.8).	1.80	$756.00
05/14/26	SJM	Revise motion to strike Pacific insurer late objection to disclosure statement.	0.70	$647.50
05/14/26	SJM	Assist with finalizing motion to compel.	0.60	$555.00
05/19/26	JCH	Prepare pro hac vice applications and orders for N. McGuffey and M. Rofaeil.	0.50	$210.00
05/19/26	MDL	Strategize with Foley team regarding possible motions in limine and Daubert motions.	1.00	$1,000.00
05/19/26	SJM	Meeting regarding evidence for trial and potential motions regarding same.	1.30	$1,202.50
05/21/26	SJM	Analyze Committee proposal to move to designate votes and approach to same (1.2); email to case team regarding same (.2).	1.40	$1,295.00
05/25/26	SJM	Analyze Committee motion to designate votes and approach to same (2.4); email to case team regarding same (.7).	3.10	$2,867.50
05/26/26	SJM	Direct N. McGuffey and N. Walsh regarding drafting of motions in limine.	0.80	$740.00
05/27/26	SJM	Call with chambers regarding scheduling for Committee request to shorten time on motion to designate claims (.1); follow up regarding same (.2).	0.30	$277.50

05/28/26	SJM	Revise proposed agreed order shortening time for hearing on Committee motion to designate votes.	0.20	$185.00
		Task Total:	12.90	$10,240.00

037 Financing

05/01/26	AMUE	Provide advice regarding DIP motion.	8.00	$9,800.00
05/01/26	MCM	Attention to last DIP issues prior to filing of DIP motion and proposed interim order.	0.80	$840.00
05/01/26	SJM	Work on revisions to DIP financing motion (2.3); review and comment on DIP budget (.4).	2.70	$2,497.50
05/01/26	SJM	Email correspondence with R. Manns regarding finalizing DIP term sheet.	0.60	$555.00
05/04/26	AMUE	Provide advice regarding DIP motion.	0.80	$980.00
05/04/26	MDL	Strategize with S. Moses regarding client request to change variance reporting covenant.	0.10	$100.00
05/04/26	SJM	Review RCC comments to DIP order (.6); email to RCC counsel regarding same (.1).	0.70	$647.50
05/04/26	SJM	Email to Committee counsel regarding DIP motion and shortened time.	0.20	$185.00
05/04/26	SJM	Revise declaration of A. Bardos in support of DIP financing motion (2.1); call with A. Bardos regarding same (.3); call with M. Lee regarding DIP terms (.2); telephone call with R. Manns regarding same (.2); email correspondence regarding finalizing DIP terms (.6).	3.40	$3,145.00
05/04/26	SJM	Further revisions to DIP motion and declaration (.4); email correspondence with client and RCC counsel regarding same (.2).	0.60	$555.00
05/05/26	AMUE	Communications with B. Weisenberg regarding DIP motion (.4) and provide advice regarding DIP motion (.8).	1.20	$1,470.00

05/05/26	JCH	Review motion for DIP financing and declaration in support (.5); revise motion to add table of contents and table of authorities (.5); finalize and file motion for DIP financing, A. Bardos declaration, application to shorten notice for hearing and S. Moses declaration (.5).	1.50	$630.00
05/05/26	MRL	Revise the motion to shorten time for hearing on the Debtor's DIP motion.	1.10	$880.00
05/05/26	MRL	Revise the Debtor's DIP motion to conform to S. Moses' comments (1.0); revise the declaration in support of the DIP motion to conform to S. Moses' comments (.7).	1.70	$1,360.00
05/05/26	MRL	Revise the DIP order for the DIP motion to conform to S. Moses' comments.	0.60	$480.00
05/05/26	SJM	Revise DIP term sheet based on discussions with RCC counsel (.3); email to RCC counsel regarding same (.1).	0.40	$370.00
05/05/26	SJM	Attention to updates to DIP motion.	0.40	$370.00
05/05/26	SJM	Revise application to shorten time for hearing on DIP financing motion.	0.60	$555.00
05/05/26	SJM	Email to client regarding filed DIP financing motion.	0.20	$185.00
05/05/26	SJM	Email correspondence with Committee counsel regarding shortening time for hearing on DIP financing motion.	0.20	$185.00
05/05/26	SJM	Final review of DIP financing motion for filing.	1.70	$1,572.50
05/06/26	AMUE	Provide advice regarding DIP motion.	0.90	$1,102.50
05/06/26	MCM	Review correspondence with Committee regarding DIP facility and confer with S. Moses regarding same.	0.40	$420.00
05/06/26	MRL	Email correspondence with the Foley team regarding the hearing on the Debtor's DIP motion.	0.20	$160.00
05/06/26	SJM	Revise notice of hearing on motion to approve DIP financing.	0.40	$370.00

05/07/26	MCM	Conference call with Committee counsel regarding interim DIP financing and DIP term sheet (.5); analysis of feedback/proposed changes by Committee to DIP term sheet and interim DIP order (.4).	0.90	$945.00
05/07/26	MDL	Strategize with S. Moses regarding Committee demands for DIP financing terms and order.	0.20	$200.00
05/07/26	MRL	Analyze the Committee's objection to the Debtor's DIP motion.	0.20	$160.00
05/07/26	SJM	Prepare responses to Committee questions regarding DIP financing (1.3); communications with M. Moore regarding same (.6); emails to J. Prol and R. Manns regarding resolving DIP questions (.6).	2.50	$2,312.50
05/07/26	SJM	Meeting with M. Moore, R. Manns, and J. Prol regarding Committee concerns with DIP financing order.	0.60	$555.00
05/07/26	SJM	Review Committee edits to proposed DIP financing order and term sheet (.7); review further comments from counsel for RCC (.2).	0.90	$832.50
05/08/26	SJM	Emails with RCC counsel and Committee counsel regarding resolving DIP loan objection (.5); prepare for hearing on same (.6).	1.10	$1,017.50
05/08/26	SJM	Work on finalizing DIP term sheet and proposed order (.4); emails with lender counsel and Committee counsel regarding same (.5).	0.90	$832.50
05/09/26	MCM	Email correspondence with various parties regarding DIP financing and alterations to proposed interim DIP order.	0.50	$525.00
05/10/26	MCM	Follow-up email correspondence with DIP lender and Committee counsel regarding proposed financing and interim DIP order language.	0.30	$315.00
05/11/26	MCM	Attention to DIP financing issues with Committee and RCC.	0.50	$525.00
05/11/26	SJM	Finalize proposed order on DIP financing motion (.3); email to Committee counsel regarding same (.2).	0.50	$462.50
05/12/26	AMUE	Provide strategy relating to DIP funding.	0.80	$980.00

05/13/26	JWGO	Analyze issues regarding DIP financing (1.2); review docket (.1); review term sheet and order (.4).	1.70	$1,615.00
05/13/26	MCM	Email correspondence regarding DIP financing and next steps.	0.40	$420.00
05/13/26	MDL	Provide instruction to J. Gordon regarding DIP credit agreement terms.	0.20	$200.00
05/13/26	SJM	Respond to A. Uetz regarding DIP funding and professional fee payments.	0.40	$370.00
05/13/26	SJM	Email correspondence with A. Bardos and R. Manns regarding execution of DIP term sheet.	0.30	$277.50
05/14/26	MCM	Call regarding DIP financing and collateral.	0.50	$525.00
05/14/26	MDL	Email correspondence with R. Manns and J. Blanchard (Norton Rose Fulbright) regarding DIP facility funding.	0.20	$200.00
05/14/26	SJM	Call with J. Gordon regarding DIP credit agreement.	0.40	$370.00
05/15/26	JWGO	Revise DIP credit agreement (1.7); review order (.4); call with S. Moses regarding same (.2).	2.30	$2,185.00
05/16/26	SJM	Analyze issues regarding DIP terms (1.0); email to J. Gordon regarding same (.3).	1.30	$1,202.50
05/18/26	JWGO	Revise credit agreement (2.2); review precedent in applicable district (.2); implement edits regarding same (.5).	2.90	$2,755.00
05/18/26	MDL	Email exchange with R. Manns regarding DIP financing funding.	0.10	$100.00
05/19/26	MDL	Telephone conference with S. Moses regarding terms for final DIP credit agreement.	0.20	$200.00
05/19/26	SJM	Correspond with J. Gordon regarding DIP credit agreement (.1); confer with M. Lee regarding same (.2); revise draft credit agreement (1.2); revise proposed final order approving DIP loan (1.3).	2.80	$2,590.00
05/20/26	SJM	Prepare supplement to DIP financing motion (.5); email to R. Manns regarding same (.2).	0.70	$647.50
05/26/26	AMUE	Analyze exit funding issue.	0.80	$980.00

05/26/26	JWGO	Analyze issues regarding financing documents (.2); correspond with team regarding same (.2).	0.40	$380.00
05/26/26	SJM	Email correspondence with counsel for RCC and counsel for the Committee regarding DIP credit agreement and final order, and Committee concerns regarding same.	0.90	$832.50
05/27/26	SJM	Review Committee-proposed edits to final DIP order (.6); email correspondence with committee counsel and lender counsel regarding same (.2).	0.80	$740.00
05/28/26	JWGO	Analyze loan documents (1.4); correspond with team regarding same (.2).	1.60	$1,520.00
05/28/26	SJM	Call with R. Manns regarding revised credit agreement (.3); revise proposed DIP order based on comments from lender (.6); email to client regarding revised DIP loan documents (.3).	1.20	$1,110.00
05/28/26	SJM	Analyze multiple rounds of edits from lender to DIP credit agreement (.6); confer with J. Gordon regarding same (.3).	0.90	$832.50
05/28/26	SJM	Turn further revision of DIP credit agreement to lender.	0.80	$740.00
05/28/26	SJM	Review amended Exhibit B and real property collateral requirements for exit facility and plan in preparation for call with client (1.0); email correspondence with case team and client regarding same (.3); emails and call with R. Manns regarding meeting to finalize exit facility collateral (.9); meeting with M. Moore (for part), client and financial advisors regarding status of real property sales and collateral status (1.1).	3.30	$3,052.50
05/28/26	SJM	Meeting with client and RCC regarding collateral for RCC loan (.8); follow-up meeting with A. Bardos and D. Flanagan (.7); call with M. Lee regarding same (.3).	1.80	$1,665.00
05/29/26	MDL	Evaluate status of DIP financing negotiations.	0.20	$200.00
		Task Total:	66.40	$64,787.50

039 JCCP 5108 Litigation (Case No. HG19048685) – Claim No. 63

05/01/26	TFCA	Emails with Z. Rutman regarding appeal analysis (.2); respond to emails regarding insurance issues and comments regarding impact of trial (.5).	0.70	$1,067.50
05/02/26	TFCA	Emails with R. Simons regarding scheduling.	0.20	$305.00
05/04/26	AROU	Revise draft proposed judgment.	0.30	$300.00
05/04/26	ERR	Edit proposed judgment.	0.50	$625.00
05/04/26	JRDO	Strategize with attorney team on issues for potential appeal and posture for upcoming cases set for trial.	0.10	$67.50
05/04/26	KAFA	Management of outstanding invoices from court reporting companies.	0.80	$384.00
05/04/26	TFCA	Edit judgment and send to team for comment.	0.40	$610.00
05/05/26	AROU	Analyze further revised draft proposed judgment.	0.10	$100.00
05/05/26	JRBL	Revisions to proposed judgment.	0.80	$1,260.00
05/05/26	TFCA	Email edited judgment to R. Simons, et al. (.2); review response regarding same (.2).	0.40	$610.00
05/06/26	AROU	Strategize regarding potential post-trial motions and appeals and legal standards and procedure governing the same.	1.40	$1,400.00
05/06/26	JRDO	Research California authority and procedure on motions for remittitur in preparation for drafting motion.	2.50	$1,687.50
05/06/26	JRDO	Draft analysis and recommendation on how to proceed with filing motion for new trial and remittitur.	1.00	$675.00
05/06/26	TFCA	Email from R. Simons regarding judgment (.2); review email from Travelers and email team regarding same (.2); review follow-up emails (.1); schedule meeting for case selection (.3).	0.80	$1,220.00
05/07/26	AROU	Strategize regarding potential post-trial motion for new trial based on excessive damages award.	1.70	$1,700.00
05/07/26	ERR	Review status of judgment and appellate timeline.	0.70	$875.00
05/07/26	JRBL	Analysis of post-trial remedies.	1.20	$1,890.00

05/07/26	JRDO	Strategize with attorney team on drafting motion for new trial.	0.20	$135.00
05/07/26	JRDO	Strategize with attorney team on drafting client memorandum on trial and insurer issues.	0.40	$270.00
05/07/26	TFCA	Review research regarding remittitur (.3); review emails from M. Kemner regarding summary of case and lessons learned (.2); emails with J. Doti regarding same (.3); review entry of judgment and email E. Ridley regarding insurers (.2); review email from Travelers and emails regarding scheduling regarding same (.3).	1.30	$1,982.50
05/07/26	WD	Coordinate docketing of deadlines triggered by service of notice of entry of judgment and review docketing report for completeness and accuracy.	0.50	$240.00
05/08/26	JRDO	Begin to draft client memorandum on post-trial and insurer-related issues.	3.10	$2,092.50
05/08/26	JRDO	Continue to strategize with attorney team on client memorandum on post-trial and insurer-related issues.	0.40	$270.00
05/08/26	KAFA	Attend internal Foley call to discuss strategy for preparation of client memorandum regarding post-trial report following the trial verdict (.3); review T. Carlucci outline for trial summary (.1).	0.40	$192.00
05/08/26	TFCA	Draft outline for client lesson learned memo (.7); attend call with team regarding same (.4); email with Z. Rutman regarding post-trial strategy (.2).	1.30	$1,982.50
05/09/26	JRDO	Continue to draft client memorandum on post-trial and insurer-related issues.	1.40	$945.00
05/09/26	TFCA	Finish drafting email regarding remittitur to client and emails regarding same and review team edits regarding same (1.0); review memo to client regarding lessons learned and make edits to same (2.0).	3.00	$4,575.00
05/10/26	JRBL	Revise client trial summary.	2.20	$3,465.00
05/10/26	JRDO	Continue to draft client memorandum on post-trial and insurer-related issues.	0.70	$472.50
05/10/26	TFCA	Follow up emails regarding logistics (.3); finalize edits for lessons learned (.7).	1.00	$1,525.00

05/11/26	AROU	Strategize regarding potential motion for new trial based on excessive damages.	1.10	$1,100.00
05/11/26	AROU	Revise draft post-trial memorandum.	1.40	$1,400.00
05/11/26	DBG	Communications with P. Batelden regarding reply brief of petitioner.	0.20	$290.00
05/11/26	ERR	Edit lessons learned memo to client.	1.00	$1,250.00
05/11/26	JRBL	Revise post-trial memo to client.	1.30	$2,047.50
05/11/26	JRDO	Continue to draft client memorandum on post-trial and insurer-related issues.	0.20	$135.00
05/11/26	JRDO	Strategize with attorney team on drafting motion for remittitur in preparation for drafting motion.	0.50	$337.50
05/11/26	KAFA	Analysis of lessons learned memo to client (.5); analysis of multiple versions of email to client regarding remittitur (.4); meeting with J. Doti regarding revisions to lessons learned memo (.3); communications with court reporter regarding final transcripts of trial (.2).	1.40	$672.00
05/11/26	TFCA	Attention to final edits regarding lessons learned memo (.7); attention to Z. Rutman response regarding appeal and email E. Ridley regarding same (.3).	1.00	$1,525.00
05/12/26	AROU	Call with Travelers, CNA Insurance, and Westport regarding potential post-trial motions and appellate issues.	0.70	$700.00
05/12/26	ERR	Prepare for (.8) and attend (.7) conference call with insurers regarding post-trial and appellate practice after verdict.	1.50	$1,875.00
05/12/26	ERR	Create insurer report regarding case status and post-trial / appellate actions.	0.50	$625.00
05/12/26	JRDO	Research California case law and authority for successful motions for new trial on grounds of remittitur in preparation for drafting motion.	1.50	$1,012.50
05/12/26	JRDO	Finalize client memorandum on post-trial and insurer-related issues.	1.30	$877.50

05/12/26	TFCA	Review final memo for client regarding lessons learned (.5); attend call with insurers regarding appeal issues (.8); respond to D. Zamora email regarding CMC statement (.3); review E. Ridley draft email to insurers (.2).	1.80	$2,745.00
05/13/26	JRDO	Begin to draft motion for new trial by drafting outline of motion.	0.90	$607.50
05/13/26	JRDO	Continue to research California case law and authority for successful motions for new trial on grounds of remittitur in preparation for drafting motion.	2.10	$1,417.50
05/13/26	JRDO	Continue to strategize with attorney team on drafting motion for remittitur in preparation for drafting motion.	0.40	$270.00
05/13/26	JRDO	Draft notice of intention to file motion for new trial.	0.60	$405.00
05/13/26	KAFA	Communications with N. Jarnagin and team regarding obtaining final trial transcripts (.2); brief review of final transcripts received (.2).	0.40	$192.00
05/13/26	TFCA	Numerous emails regarding selection process between A. Uetz, E. Ridley and J. Blease (.5); draft specific responses to A. Uetz questions regarding upcoming CMC and selection process (.3).	0.80	$1,220.00
05/14/26	AROU	Analyze California case law governing motions for new trial based on excessive damages.	0.90	$900.00
05/14/26	JRDO	Research California authority on conditional remittitur in preparation for drafting motion for new trial.	0.50	$337.50
05/14/26	JRDO	Strategize with attorney team on arguments to raise in motion for new trial in preparation for drafting motion.	0.10	$67.50
05/14/26	JRDO	Begin to draft motion for new trial by drafting argument sections.	2.10	$1,417.50

05/14/26	TFCA	Review chart to prepare for call (.4); confer with J. Blease regarding same (.3); attend call with R. Simons and E. Ridley regarding case selection (.6); follow-up call with E. Ridley regarding same (.3); numerous emails with M. Kemner regarding post-trial motions (.3); telephone call regarding same (.3); review email to A. Uetz regarding case selection from E. Ridley (.2).	2.40	$3,660.00
05/15/26	AROU	Strategize regarding potential motion for new trial based on excessive damages.	1.10	$1,100.00
05/18/26	JRBL	Analysis of cases for recommendation to court.	2.20	$3,465.00
05/18/26	JRDO	Strategize with attorney team on drafting motion for new trial.	0.30	$202.50
05/18/26	TFCA	Emails with M. Kemner regarding new trial motion.	0.20	$305.00
05/19/26	JRDO	Continue to draft motion for new trial by drafting introduction and legal standard sections.	3.00	$2,025.00
05/19/26	JRDO	Research California authority on insufficiency of evidence as grounds for new trial in preparation for drafting motion for new trial.	2.10	$1,417.50
05/19/26	JRDO	Strategize with attorney team on drafting motion for new trial and finalizing notice of intention to file motion for new trial.	0.30	$202.50
05/20/26	JRBL	Analysis of post-trial motion and strategy.	1.40	$2,205.00
05/20/26	JRDO	Revise notice of intention to file new trial motion.	0.20	$135.00
05/20/26	JRDO	Research California authority for verdicts with similar fact scenarios to plaintiff in furtherance of drafting motion for new trial.	1.20	$810.00
05/20/26	JRDO	Continue to draft motion for new trial by drafting argument sections.	2.70	$1,822.50
05/20/26	TFCA	Emails and telephone call with M. Kemner regarding post-trial motions and settlement strategy.	0.50	$762.50
05/21/26	JRDO	Continue to draft motion for new trial by drafting evidentiary citations to trial record in brief.	1.40	$945.00
05/21/26	JRDO	Finalize notice of intention to file motion for new trial.	0.50	$337.50

05/21/26	JRDO	Continue to draft motion for new trial by drafting and revising introduction, legal standard, and argument sections.	6.50	$4,387.50
05/21/26	TFCA	Review memo for costs and telephone call with J. Blease and email B. Morris regarding same (.3); review emails from insurers regarding motion regarding remittitur (.4); review final motion for remittitur with edits (.2).	0.90	$1,372.50
05/22/26	JRDO	Draft proposed order and attorney declaration in support of motion for new trial.	1.10	$742.50
05/22/26	KAFA	Review plaintiff's memo of costs and communications with team regarding same.	0.20	$96.00
05/26/26	AROU	Revise motion for new trial or, in the alternative, for conditional remittitur.	3.50	$3,500.00
05/26/26	JRBL	Prepare for CMC by reviewing case files.	1.30	$2,047.50
05/26/26	JRDO	Strategize with attorney team on brief in support of motion for new trial.	0.20	$135.00
05/26/26	TFCA	Attention to collection of invoices and follow up.	0.30	$457.50
05/27/26	AROU	Revise motion for new trial or, in the alternative, for conditional remittitur.	1.30	$1,300.00
05/27/26	JRDO	Research California authority and statutes to confirm deadlines on motion for new trial.	0.50	$337.50
05/27/26	JRDO	Strategize with attorney team on finalizing brief in support of motion for new trial.	0.20	$135.00
05/28/26	AROU	Revise draft motion for new trial.	0.90	$900.00
05/28/26	AROU	Compile communications with plaintiff's counsel in preparation for production pursuant to insurer request.	0.60	$600.00
05/28/26	AROU	Revise draft T. Carlucci's declaration in support of motion for new trial.	0.20	$200.00
05/28/26	AROU	Revise draft proposed order granting motion for new trial.	0.40	$400.00
05/28/26	JRBL	Analysis of motion for new trial and cases noted in preparation for filing.	2.20	$3,465.00

05/28/26	JRDO	Revise memorandum of points and authorities, attorney declaration, and proposed order in support of motion for new trial.	4.20	$2,835.00
05/28/26	JRDO	Strategize with attorney team on revising brief, proposed order, and declaration in support of motion for new trial.	0.50	$337.50
05/28/26	TFCA	Review draft remittitur and discussion with team regarding same.	0.70	$1,067.50
05/29/26	ERR	Edit new trial brief including reference to juror statement regarding "warrior".	1.00	$1,250.00
05/29/26	JRDO	Begin to draft request for judicial notice in support of motion for new trial.	1.00	$675.00
05/29/26	JRDO	Continue to strategize with attorney team on revising brief, proposed order, and declaration in support of motion for new trial.	0.40	$270.00
05/29/26	TFCA	Emails regarding edits to brief (.3); review emails from insurers regarding brief (.2).	0.50	$762.50
05/30/26	JRBL	Analysis of motion filed by insurers to intervene.	0.60	$945.00
		Task Total:	102.40	$103,963.50

040 JCCP 5108 Litigation (Case No. 22CV020490) – Claim No. 182

05/05/26	TFCA	Attention to emails from Z. Rutman (.1); review emails from A. Ouellette regarding same (.2).	0.30	$457.50
05/07/26	AROU	Strategize regarding fact investigation for discovery responses.	0.40	$400.00
05/07/26	TFCA	Review numerous emails regarding document requests and discussion regarding staying matter in connection with new accused party cases.	0.30	$457.50
05/08/26	TFCA	Emails with Z. Rutman regarding standing down pending CMC.	0.20	$305.00
05/12/26	TFCA	Attention to the newly filed actions.	0.20	$305.00
05/19/26	KAFA	Communications with T. Carlucci regarding records request.	0.30	$144.00

05/19/26	TFCA	Attention to document request.	0.20	$305.00
		Task Total:	1.90	$2,374.00

043 JCCP 5108 Litigation (Case No. 22CV023118) – Claim No. 52

05/01/26	TFCA	Respond to counsel email.	0.20	$305.00
05/05/26	AROU	Strategize regarding status of document collection and fact investigation.	0.60	$600.00
05/13/26	TFCA	Review draft CMC statement regarding state cases 5108 and respond to D. Zamora regarding same.	0.20	$305.00
		Task Total:	1.00	$1,210.00

044 JCCP 5108 Litigation (Case No. 22CV02733) – Claim No. 47

05/05/26	AROU	Strategize regarding status of document collection and fact investigation.	0.60	$600.00
		Task Total:	0.60	$600.00
		Services Total:	1,253.30	$1,258,572.00

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Jack R. Doti	JRDO	Associate	46.70	$675.00	$31,522.50
Mason Roberts	MR	Associate	35.20	$850.00	$29,920.00
Mary Rofaeil	MRL	Associate	127.70	$800.00	$102,160.00
Nathan C. Walsh	NCW	Associate	31.10	$650.00	$20,215.00
Nora McGuffey	NMCG	Associate	121.70	$825.00	$100,402.50
Shane J. Moses	SJM	Of Counsel	129.00	$925.00	$119,325.00
Sophie Le	SL	Other	1.10	$300.00	$330.00
Janelle C. Harrison	JCH	Paralegal	28.70	$420.00	$12,054.00
Kerry A. Farrar	KAFA	Paralegal	33.20	$480.00	$15,936.00
Wendy DelValle	WD	Paralegal	5.50	$480.00	$2,640.00
Ann Marie Uetz	AMUE	Partner	137.60	$1,225.00	$168,560.00
Alan R. Ouellette	AROU	Partner	50.90	$1,000.00	$50,900.00
David B. Goroff	DBG	Partner	98.30	$1,450.00	$142,535.00

Emil P. Khatchatourian	EPK	Partner	1.30	$1,000.00	$1,300.00
Eileen R. Ridley	ERR	Partner	69.00	$1,250.00	$86,250.00
Geoffrey S. Goodman	GSG	Partner	0.20	$1,175.00	$235.00
Jeff R. Blease	JRBL	Partner	20.00	$1,575.00	$31,500.00
Mark C. Moore	MCM	Partner	173.40	$1,050.00	$182,070.00
Matthew D. Lee	MDL	Partner	66.20	$1,000.00	$66,200.00
Thomas F. Carlucci	TFCA	Partner	41.20	$1,525.00	$62,830.00
Jake W. Gordon	JWGO	Senior Counsel	8.90	$950.00	$8,455.00
Tamar N. Dolcourt	TND	Special Counsel	26.40	$880.00	$23,232.00
Totals			**1,253.30**		**$1,258,572.00**

Expenses Incurred

Description	**Amount**
Depositions / Transcripts, Exams	$21,856.84
Electronic Legal Research Services	$1,425.90
LSS - eDiscovery Services	$14,200.00
Mailing Expense	$256.75
Meals	$686.60
Other Expenses	$52,639.05
Other Fees	$766.00
Recording / Filing Fees	$2,486.74
Shipping Charges	$466.27
Shipping/courier/messenger services	$252.01
Transcripts	$26.40
Transportation / Travel Expenses	$11,005.82
Expenses Incurred Total	**$106,068.38**

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

Expense Detail

Depositions / Transcripts, Exams

Date	Initials	Description	Amount
03/04/26	JRBL	Steno Agency - Transcript of deposition of Jennifer Keller, PhD conducted on 2/26/26 - 03/04/26.	$315.00
03/16/26	JRBL	Steno Agency - Transcript of hearing conducted 3/11/26, Alameda Superior Court - 03/16/26.	$642.50
04/29/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of April 15, 2026 hearing transcript - 04/29/26.	$660.00
04/29/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 1 of trial - 04/29/26.	$1,680.00
04/29/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 6 of trial - 04/29/26.	$1,470.00
04/29/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 4 of trial - 04/29/26.	$1,695.00
04/29/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 2 of trial - 04/29/26.	$1,345.00
04/29/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 3 of trial - 04/29/26.	$1,640.00
04/29/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 5 of trial - 04/29/26.	$1,800.00
04/29/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 2 of trial - 04/29/26.	$620.00
05/08/26	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Copy of Transcript: Bishop Michael C. Barber (Vol II) - 05/08/26.	$1,614.35
05/11/26	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Copy of Transcript: Ronald Gies - 05/11/26.	$664.30
05/11/26	JRBL	HUDSON REPORTING & VIDEO, INC. - Transcript of Attila Bardos - 05/11/26.	$2,563.55
05/11/26	JRBL	HUDSON REPORTING & VIDEO, INC. - Certified Copy of Transcript: Andrew Currier - 05/11/26.	$725.05
05/13/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 4 of trial - 05/13/26.	$577.50
05/13/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 6 of trial - 05/13/26.	$387.75
05/13/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 3 of trial - 05/13/26.	$536.25
05/13/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 5 of trial - 05/13/26.	$664.13

05/13/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 7 of trial - 05/13/26.	$66.25
05/15/26	JRBL	Steno Agency - Deposition of Attila Bardos - 05/15/26.	$2,190.21
			$21,856.84

Electronic Legal Research Services

Date	Initials	Description	Amount
05/31/26	SL	Westlaw. IMAGE276-0. DOCKET REPORT. CONTEXT COMPANY PROSPECTING LIST.	$1,425.90

LSS - eDiscovery Services

Date	Initials	Description	Amount
05/31/26	JRBL	LSS - eDiscovery Services.	$14,200.00

Mailing Expense

Date	Initials	Description	Amount
05/14/26	JRBL	DAY N NITE INC. - Special delivery - David Goroff - 05/14/26.	$39.50
05/21/26	JRBL	DAY N NITE INC. - Rush service deliveries - 05/21/26.	$59.25
05/21/26	JRBL	DAY N NITE INC. - Rush service deliveries - 05/21/26.	$79.00
05/28/26	JRBL	DAY N NITE INC. - Rush Services - David Goroff and Jami Gekas - 05/28/26.	$79.00
			$256.75

Meals

Date	Initials	Description	Amount
05/01/26	JRBL	Hotel - Breakfast--VENDOR: Jeff Blease 05/01/26 Post trial meeting/ prep for next trial - - Jeff Blease.	$34.11
05/01/26	JRBL	Hotel - Dinner--VENDOR: Jeff Blease 05/01/26 Post trial meeting/ prep for next trial - - Jeff Blease.	$124.29
05/26/26	MCM	Hotel - Dinner--VENDOR: Mark C. Moore 05/26/26 Dinner on 5/26 with David Goroff in Chicago - - Mark C. Moore, David Goroff.	$137.33
05/27/26	AMUE	Dinner--VENDOR: Ann Marie Uetz 05/27/26 Attendance at expert deposition of Charles Moore in Chicago - - Ann Marie Uetz.	$60.15
05/27/26	MDL	Breakfast--VENDOR: Matt Lee 05/27/26 RCBO Expert Witness Depositions in Chicago - - Matt Lee.	$11.37
05/27/26	MDL	Hotel - Dinner--VENDOR: Matt Lee 05/27/26 RCBO Expert Witness Depositions in Chicago - - Matt Lee, Nora McGuffey, Mark C. Moore, David Goroff, Ann Marie Uetz.	$166.00

05/27/26	MCM	Hotel - Dinner--VENDOR: Mark C. Moore 05/27/26 Coffee on 5/27 in Chicago - - Mark C. Moore.	$13.17
05/27/26	MCM	Hotel - Meals Other--VENDOR: Mark C. Moore 05/27/26 Drinks with Nora McGuffey, Matt Lee, David Goroff, and Ann Marie Uetz in Chicago - - Mark C. Moore.	$97.46
05/28/26	AMUE	Hotel - Breakfast--VENDOR: Ann Marie Uetz 05/28/26 Attendance at expert deposition of Charles Moore in Chicago - - Ann Marie Uetz.	$31.46
05/28/26	MDL	Breakfast--VENDOR: Matt Lee 05/28/26 RCBO Expert Witness Depositions in Chicago - - Matt Lee.	$11.26
			$686.60

Other Expenses

Date	Initials	Description	Amount
02/28/26	JRBL	Epiq Global Business Transformation Solutions LLC - OS Overtime services - Feb 2026 - All offices - Chicago - 02/28/26.	$65.88
05/21/26	JRBL	Jeff Anderson & Associates, P.A. - Reimbursement of plaintiff's costs per Memorandum of Costs dated 5/21/26 (copy attached) - 05/21/26.	$52,548.17
05/28/26	MRL	Dues--VENDOR: Mary Rofaeil - Bar Materials - 12/31/25-05/28/26.	$25.00
			$52,639.05

Other Fees

Date	Initials	Description	Amount
05/31/26	ASD	Other Fees--VENDOR: U.S. BANK 05/29/26 Document download for RCBO team. -. Other Fees--VENDOR: U.S. BANK 05/22/26 Hearing reservation fee. -. Certificate of Good Standing--VENDOR: Nora McGuffey 05/21/26 RCBO - Certificates of Good Standing - TX -. CASE ANYWHERE, LLC - System access fees - 05/01/26. Certificate of Good Standing--VENDOR: U.S. BANK 05/29/26 Pro Hac Vice for Mary Rofaeil -.	$766.00

Certificate of Good Standing--VENDOR: U.S. BANK
05/29/26 Pro Hac Vice for Nora McGuffey -.

Recording / Filing Fees

Date	Initials	Description	Amount
05/06/26	MR	Recording/Filing Fees--VENDOR: Mason Roberts 05/06/26 Fee for PHV in Northern District of CA -.	$328.00
05/08/26	JRBL	ACE ATTORNEY SERVICE, INC. - efiling, PDF chamber copy, PDF filing, - 05/08/26.	$2,158.74
			$2,486.74

Shipping Charges

Date	Initials	Description	Amount
05/31/26	DBG	Federal Express Invoice: 930420987; Tracking: 381262592055; Sender: DAVID GOROFF; Comment: BANKER BOXES. Federal Express Invoice: 929583548; Tracking: 381133047921; Sender: Jeffrey Blease; Comment: banker box legal documents. Federal Express Invoice: 932389675; Tracking: 381523369729; Sender: David Goroff. Federal Express Invoice: 932389675; Tracking: 381523416316; Sender: David Goroff. Federal Express Invoice: 932366579; Tracking: 872310951587; Sender: Alan Ouellette. Federal Express Invoice: 930420987; Tracking: 381262594183; Sender: DAVID GOROFF; Comment: BANKER BOXES. Federal Express Invoice: 932379685; Tracking: 381494639860; Sender: Nora McGuffey.	$466.27

Shipping/courier/messenger services

Date	Initials	Description	Amount
05/06/26	ASD	Messenger/Courier Service--VENDOR: U.S. BANK 05/06/26 DHL shipping of case documents to T. Carlucci.	$252.01

Transcripts

Date	Initials	Description	Amount
05/22/26	JRBL	FRANKLIN COURT REPORTING, INC. - Hearing Transcript - 05/22/26.	$26.40

Transportation / Travel Expenses

Date	Initials	Description	Amount
05/02/26	JRBL	Lodging--VENDOR: Jeff Blease - 05/02/26.	$4,791.48

05/12/26	MCM	Airfare--VENDOR: Mark C. Moore - Airfare from DFW to ORD - Deposition in Chicago - 05/28/26.	$922.80
05/22/26	DBG	Airfare--VENDOR: David Goroff - Travel to NYC for deposition in RCBO matter - ORD to LGA - 06/03/26.	$534.52
05/25/26	MCM	Taxi/Car Service--VENDOR: Mark C. Moore - Re deposition in Chicago - 05/28/26.	$94.24
05/25/26	MCM	Taxi/Car Service--VENDOR: Mark C. Moore - Re deposition in Chicago - 05/28/26.	$142.29
05/26/26	MCM	Airfare--VENDOR: Mark C. Moore - DFW-->LGA-->DFW - Re deposition in New York - 06/03/26.	$674.80
05/27/26	AMUE	Toll--VENDOR: Ann Marie Uetz - Attendance at expert deposition of C. Moore in Chicago - 05/28/26.	$14.90
05/27/26	AMUE	Hotel - Parking--VENDOR: Ann Marie Uetz - Attendance at expert deposition of C. Moore in Chicago - 05/28/26.	$86.00
05/28/26	AMUE	Lodging--VENDOR: Ann Marie Uetz - Attendance at expert deposition of C. Moore in Chicago - 05/28/26.	$532.67
05/28/26	AMUE	Mileage--VENDOR: Ann Marie Uetz - Attendance at expert deposition of C. Moore in Chicago - 05/28/26.	$410.60
05/28/26	AMUE	Toll--VENDOR: Ann Marie Uetz - Attendance at expert deposition of C. Moore in Chicago - 05/28/26.	$14.90
05/28/26	MDL	Car Rental Fuel--VENDOR: Matt Lee - RCBO Expert Witness Depositions in Chicago - 05/28/26.	$57.03
05/28/26	MDL	Car Rental--VENDOR: Matt Lee - RCBO Expert Witness Depositions in Chicago - 05/28/26.	$266.55
05/28/26	MDL	Taxi/Car Service--VENDOR: Matt Lee - RCBO Expert Witness Depositions in Chicago - 05/28/26.	$18.95
05/28/26	MDL	Hotel - Parking--VENDOR: Matt Lee - RCBO Expert Witness Depositions in Chicago - 05/28/26.	$172.00
05/28/26	MDL	Lodging--VENDOR: Matt Lee - RCBO Expert Witness Depositions in Chicago - 05/28/26.	$941.99
05/28/26	MCM	Lodging--VENDOR: Mark C. Moore - Re deposition in Chicago - 05/28/26.	$1,064.16
05/28/26	MCM	Taxi/Car Service--VENDOR: Mark C. Moore - Re deposition in Chicago - 05/28/26.	$131.18
05/28/26	MCM	Taxi/Car Service--VENDOR: Mark C. Moore - Re deposition in Chicago - 05/28/26.	$134.76
			$11,005.82
		Expense Total:	$106,068.38

FOLEY

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Roman Catholic Bishop of Oakland
Attn: Attila Bardos
Chief Financial Officer
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: July 30, 2026
Invoice No.: 51346460
Our Ref. No.: 100845-0402

Services through June 30, 2026

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	$1,996,659.50
Total Expenses:	$67,979.04
Amount Due:	**$2,064,638.54**

Please reference your invoice number 51346460 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of this invoice.

Federal Employer Number: 39-0473800

Professional Services Detail

005 Bar Date Motion/ Claims Reconcil./ Claim Reconciliation Issues

06/01/26	MRL	Email correspondence with M. Moore and S. Moses regarding the stipulation for the claims.	0.20	$160.00
06/05/26	MCM	Email and telephone communications with counsel for late-filed claims regarding cross-motion to allow.	0.50	$525.00
06/08/26	MRL	Draft the Debtor's opposition to the cross-motion to allow late-filed claim.	1.00	$800.00
06/09/26	MCM	Revisions to Debtor's opposition to cross-motion to enlarge bar date to allow late-filed claim and declaration in support of same.	1.20	$1,260.00
06/09/26	MRL	Revise the Debtor's opposition to the cross-motion to allow late-filed claim to conform to M. Moore's comments.	0.70	$560.00
06/10/26	MCM	Email correspondence with counsel for claimants 564 and 565 regarding allowance of claims and voting issues.	0.40	$420.00
		Task Total:	4.00	$3,725.00

006 Case Administration (docket updates, WIP, and calendar)

06/04/26	JCH	Update daily docket report.	0.50	$210.00
06/05/26	JCH	File period report regarding Furrer Properties (.2); update daily docket report (.5).	0.70	$294.00
06/08/26	JCH	Prepare and file notice of core service list as of June 8, 2026 (.5); update daily docket report (.2).	0.70	$294.00
06/09/26	JCH	File stipulation regarding plan real properties (.2); update daily docket report (.5).	0.70	$294.00
06/10/26	JCH	Update master case calendar and timeline.	0.50	$210.00
06/11/26	JCH	Update docket report for June 10, 2026 to include all filings (.5); update docket report for June 11, 2026 (.5).	1.00	$420.00
06/12/26	JCH	Update daily docket report.	0.50	$210.00

06/15/26	JCH	Update daily docket report.	0.50	$210.00
06/16/26	JCH	Update daily docket report.	0.50	$210.00
06/17/26	JCH	Update daily docket report.	0.50	$210.00
06/18/26	JCH	Update daily docket report.	0.50	$210.00
06/22/26	JCH	Update daily docket report.	0.50	$210.00
06/23/26	JCH	Update daily docket report.	0.50	$210.00
06/24/26	JCH	Update daily docket report.	0.50	$210.00
06/25/26	JCH	Update daily docket report.	0.20	$84.00
06/26/26	JCH	Update daily docket report.	0.20	$84.00
06/29/26	JCH	Update daily docket report.	0.50	$210.00
06/30/26	JCH	Add routine calendar appointments through October 2026 (.5); update daily docket report (.5).	1.00	$420.00
		Task Total:	10.00	$4,200.00

007 Chapter 11 Plan/ Plan Confirmation

06/01/26	AMUE	Meeting with Foley team regarding deposition designations (.3) and outline same (.7); outline and provide advice relating to potential witnesses for trial and how to present testimony (1.8).	2.80	$3,430.00
06/01/26	AMUE	Meeting with D. Kaplan regarding pretrial order (.5) and revisions to pretrial order (.7).	1.20	$1,470.00
06/01/26	AMUE	Strategy meeting with Foley team regarding confirmation trial assignments (.8); follow up on same (.2).	1.00	$1,225.00

06/01/26	DBG	Revise motions in limine (6.3); team call regarding assignment status (partial) (.4); communications with M. Rofaeil regarding addition to confirmation brief (.3); conference with M. Moore and M. Rofaeil regarding confirmation brief (.3); communications with M. Kaplan regarding new question for M. Babcock and communications with A. Uetz regarding same (.4); communications with M. Kemner regarding confirmation hearing strategy (.4); communications with T. Dolcourt regarding confirmation brief research (.1); legal research regarding First Amendment and RFRA continued (.8).	9.00	$13,050.00
06/01/26	MCM	Preparation for deposition of D. Martin in NYC focusing on legal arguments in response to Committee and insurer objections in confirmation brief (6.0); continue working on confirmation brief based on feedback from various individuals (1.2); attention to plan supplement documents and related issues (.5).	7.70	$8,085.00
06/01/26	MDL	Strategize with Foley team regarding Class 5 plan voting.	0.20	$200.00
06/01/26	MDL	Meet with Foley team regarding status of discovery and court deliverables.	0.80	$800.00
06/01/26	MDL	Final review of amendment to plan supplement.	0.10	$100.00
06/01/26	MR	Telephone discussions with various counsel regarding vote on fourth amended plan.	0.80	$680.00
06/01/26	MRL	Draft the deposition designations for the confirmation hearing.	1.00	$800.00
06/01/26	MRL	Call with M. Moore and D. Martin regarding preparations for the deposition.	1.60	$1,280.00
06/01/26	MRL	Correspondence with D. Goroff regarding revisions to the confirmation brief.	0.10	$80.00
06/01/26	MRL	Analyze revisions to the pretrial order.	0.30	$240.00
06/01/26	MRL	Team call with the Foley team to discuss preparations for the confirmation hearing (partial).	0.50	$400.00
06/01/26	MRL	Call with N. McGuffey and A. Uetz to discuss the deposition designations.	0.30	$240.00

06/01/26	MRL	Confer with D. Goroff and M. Moore regarding revisions to the confirmation brief.	0.40	$320.00
06/01/26	MRL	Email correspondence with the Foley team regarding the depositions.	0.50	$400.00
06/01/26	MRL	Continue revising the confirmation brief in support of the Debtor's plan to conform to M. Moore's comments.	2.40	$1,920.00
06/01/26	NCW	Legal research regarding issues related to Debtor's motions in limine.	4.70	$3,055.00
06/01/26	NCW	Revise Debtor's third motion in limine to incorporate comments from Foley team.	1.30	$845.00
06/01/26	NCW	Revise Debtor's second motion in limine to incorporate comments from Foley team.	1.70	$1,105.00
06/01/26	NCW	Revise Debtor's first motion in limine to incorporate comments from Foley team.	0.20	$130.00
06/01/26	NMCG	Continue drafting the discovery motions in connection with the confirmation hearing (7.6); strategize regarding motions and related case law research with N. Walsh and D. Goroff (1.6); meeting regarding trial assignments with Foley team (.7); draft client correspondence with update regarding depositions (.5); correspond with Committee and insurer counsel regarding upcoming depositions (.3); assist in upcoming deposition preparation (.7); meeting with A. Uetz and M. Rofaeil regarding deposition designations (.3).	11.70	$9,652.50
06/01/26	SJM	Email to R. Manns regarding Hilco valuations for real properties.	0.30	$277.50
06/01/26	SJM	Attend team call regarding evidence for trial and trial preparation.	0.70	$647.50
06/01/26	SJM	Draft amendment to plan supplement (.7); attention to finalizing real property listing exhibit to same (.6).	1.30	$1,202.50
06/01/26	SJM	Prepare for call with Committee regarding pretrial order (.3); call with A. Uetz, M. Kaplan, and C. Restel regarding same (.5).	0.80	$740.00

06/01/26	WD	Assist with preparation and finalization of memorandum of points & authorities in support of motion for new trial, declaration in support and exhibits, request for judicial notice and exhibits, [proposed] order granting request for judicial notice, and [proposed] order granting motion for new trial (4.3); serve motion for new trial and supporting papers via Case Anywhere (.2); coordinate e-filing of motion for new trial and supporting papers (.2).	4.70	$2,256.00
06/02/26	AMUE	Prepare for contested confirmation trial including witness presentation, exhibits and review of Committee objection to strategize regarding evidence for trial.	4.50	$5,512.50
06/02/26	DBG	Prepare outline and exhibits for M. Babcock's second deposition (4.5); research constitutional law issues regarding plan alternatives (2.1); communications with T. Dolcourt regarding legal research regarding constitutional/RFRA issues (.1).	6.70	$9,715.00
06/02/26	MCM	Prepare for and attend deposition of D. Martin, Debtor expert on other case outcomes in bankruptcy (4.0); continue working on confirmation brief, incorporating testimony from deposition of C. Moore, Debtor CRO (3.2); strategize with D. Goroff regarding continued deposition of M. Babcock, Committee corporate representative (.6); work on deposition designations with N. McGuffey and M. Rofaeil in advance of filing deadline on 6/4 (.5); revise declaration of D. Martin as direct testimony (1.0); email correspondence with Foley team regarding status of different issues (.3).	9.60	$10,080.00
06/02/26	MDL	Prepare for defense of deposition of K. Martens.	1.00	$1,000.00
06/02/26	MDL	Defend deposition of K. Martens.	1.50	$1,500.00
06/02/26	MDL	Strategize with Foley team regarding evidence to be presented at confirmation hearing.	0.60	$600.00
06/02/26	MRL	Email correspondence with the Foley team regarding preparations for the confirmation hearing.	0.30	$240.00

06/02/26	MRL	Draft witness declarations for the confirmation hearing.	0.70	$560.00
06/02/26	MRL	Continue revising the confirmation brief in support of the Debtor's plan to conform to M. Moore's comments.	0.40	$320.00
06/02/26	MRL	Attend remotely the deposition of K. Martens.	1.50	$1,200.00
06/02/26	MRL	Attend remotely the deposition of D. Martin.	3.00	$2,400.00
06/02/26	MRL	Confer with N. McGuffey regarding the deposition designations.	0.20	$160.00
06/02/26	MRL	Continue drafting the deposition designations for the confirmation hearing.	3.60	$2,880.00
06/02/26	MRL	Call with N. McGuffey, M. Moore, and D. Goroff regarding strategies for the confirmation hearing.	0.50	$400.00
06/02/26	NCW	Revise Debtor's first motion in limine.	1.10	$715.00
06/02/26	NCW	Conduct legal research regarding issues related to Debtor's first motion in limine.	0.90	$585.00
06/02/26	NCW	Conduct legal research regarding issues related to Debtor's motion to strike expert testimony of P. Shields.	2.90	$1,885.00
06/02/26	NCW	Revise Debtor's motion to strike expert testimony of P. Shields.	0.40	$260.00
06/02/26	NMCG	Assist with preparing for M. Babcock's continued deposition (.9); call with D. Goroff regarding the same (.3).	1.20	$990.00
06/02/26	NMCG	Analyze deposition transcripts of M. Babcock and P. Shields for deposition designations (4.3); prepare deposition designations regarding the same (2.2).	6.50	$5,362.50
06/02/26	NMCG	Continue drafting discovery motions, including motions in limine and Daubert motion (4.7); research regarding the same (2.1); various correspondence with N. Walsh regarding drafting discovery motions and related proposed orders (.4).	7.20	$5,940.00
06/02/26	TND	Call with D. Goroff on research issues for confirmation brief.	0.10	$88.00

06/02/26	WD	Attention to recently filed papers regarding motion for new trial.	0.20	$96.00
06/03/26	AMUE	Meeting with R. Manns regarding confirmation issue.	0.80	$980.00
06/03/26	AMUE	Outline testimony for Bishop Barber's direct examination.	3.40	$4,165.00
06/03/26	AMUE	Analyze issues for trial to identify potential trial exhibits.	2.90	$3,552.50
06/03/26	DBG	Continued preparation for M. Babcock's second deposition (1.5); take M. Babcock's second deposition (3.0); conferences with N. McGuffey regarding motions in limine (.6); confer with A. Uetz regarding Bishop Barber's testimony (.2); confer with M. Moore regarding Daubert motions (.2); confer with M. Lee regarding insurers (.2); review M. Kaplan email attaching communications with insurers (.3).	6.00	$8,700.00
06/03/26	MCM	Work on witness direct declarations and deposition designations (3.5); additional work on confirmation brief to address insurer and U.S. Trustee objections (2.0); analysis of witness availability at confirmation hearings (.5); analysis of Committee requests and proposal regarding further amended Exhibit B and related issues (.5); further work on deposition designations for K. McNally (1.2); revisions to Daubert motion against K. McNally (2.0); confer with Foley team regarding trial logistics, exhibit lists, and Thursday and Friday filings (.6); work on P. Shields' deposition designations (.8).	11.10	$11,655.00
06/03/26	MR	Draft sections of A. Bardos' direct testimony declaration (.6); strategy call with N. McGuffey regarding same (.3); analyze requests from insurers regarding proposed stipulations for confirmation hearing (.3); continue drafting responses to requests for admission received from insurers (.4).	1.60	$1,360.00
06/03/26	MRL	Continue drafting the deposition designations for the confirmation hearing.	1.30	$1,040.00

06/03/26	MRL	Email correspondence with the Foley team regarding preparations for the confirmation hearing.	0.10	$80.00
06/03/26	MRL	Email correspondence with NERA regarding deposition transcripts.	0.20	$160.00
06/03/26	MRL	Confer with A. Uetz regarding preparations for the confirmation hearing.	0.20	$160.00
06/03/26	MRL	Continue revising the confirmation brief in support of the Debtor's plan to conform to M. Moore's comments.	0.90	$720.00
06/03/26	MRL	Confer with N. McGuffey regarding the deposition designations.	0.10	$80.00
06/03/26	MRL	Attend remotely a portion of the M. Babcock deposition.	0.70	$560.00
06/03/26	MRL	Continue drafting witness declarations for the confirmation hearing.	4.60	$3,680.00
06/03/26	MRL	Confer with N. McGuffey and M. Moore regarding the declarations in support of the confirmation hearing.	0.40	$320.00
06/03/26	NCW	Revise Debtor's third motion in limine to incorporate comments from Foley team.	0.30	$195.00
06/03/26	NCW	Revise Debtor's motion to strike expert testimony of P. Shields.	1.60	$1,040.00
06/03/26	NCW	Prepare proposed orders to Debtor's motions in limine.	0.30	$195.00
06/03/26	NCW	Continue legal research regarding issues related to Debtor's motion to strike expert testimony of P. Shields.	0.70	$455.00
06/03/26	NCW	Revise Debtor's second motion in limine to incorporate comments from Foley team.	2.10	$1,365.00
06/03/26	NCW	Prepare proposed order to Daubert motion.	0.30	$195.00
06/03/26	NCW	Revise Debtor's first motion in limine to incorporate comments from Foley team.	2.30	$1,495.00

06/03/26	NMCG	Prepare client summary of C. Moore's deposition (.7); prepare C. Moore's declaration in support of confirmation (2.4); various correspondence with D. Goroff and A. Uetz regarding the same (.8); correspond with C. Moore regarding declaration (.2); continue revising draft deposition designations for P. Shields (.8); call with M. Roberts regarding insurance-related issues for confirmation hearing preparations (.3); attend M. Babcock's deposition (1.0).	6.20	$5,115.00
06/03/26	NMCG	Revise the discovery motions, including the motions in limine and Daubert motion for Committee experts (5.3); prepare declarations in support (.8); various correspondence with N. Walsh, D. Goroff and A. Uetz regarding the same (1.2).	7.30	$6,022.50
06/03/26	SJM	Analyze insurer objections to confirmation in order to prepare response to same.	2.30	$2,127.50
06/03/26	TND	Research regarding religious freedom issues for D. Goroff for confirmation brief.	1.50	$1,320.00
06/03/26	WD	Attention to transcript for May 8, 2026 case management conference (In Re Roman Catholic Bishop of Oakland Bankruptcy Automatic Stay Appeal).	0.10	$48.00
06/04/26	AMUE	Prepare for (1.0) and meet with M. Kemner, A. Bardos and D. Flanagan regarding privileged issue relating to trial preparation (1.2).	2.20	$2,695.00
06/04/26	AMUE	Review email communications relating to exhibits and provide advice regarding same.	0.80	$980.00
06/04/26	AMUE	Finalize deposition designations.	0.80	$980.00
06/04/26	AMUE	Analyze potential trial exhibits.	2.50	$3,062.50
06/04/26	AMUE	Revisions to three motions in limine.	1.80	$2,205.00
06/04/26	DBG	Revise motions in limine (2.3); revise Daubert motions (1.2); conference with A. Uetz, C. de Quesada, D. Flanagan, A. Bardos, and M. Kemner regarding loans and financial issues (.9); confer with A. Uetz regarding insurance issue (.2); continue drafting constitutional law section of confirmation brief (4.0).	8.60	$12,470.00

06/04/26	ERR	Edit A. Bardos' declaration regarding insurance issues.	0.70	$875.00
06/04/26	JCH	Prepare draft notices of hearing for three motions in limine and two Daubert motions (1.0); revise styles and formatting in two Daubert motions and add tables of contents and tables of authorities to both (1.8); compile exhibits and prepare Daubert motions and declarations for filing (.8); email correspondence with Foley group regarding same (.3); file Daubert motions, declarations in support and notices of hearing (.5); compile exhibits and prepare three motions in limine and declaration for filing (.8); email correspondence with Foley group regarding same (.3); file three motions in limine, declaration in support and notices of hearing (.5); save copies of filings and send .zip file of same to Foley group (.8).	6.80	$2,856.00
06/04/26	MCM	Continue working on witness declarations for D. Martin and A. Bardos (1.5); revisions to form and substance of deposition designations (.6); analysis of second/further amended Exhibit B containing properties to be monetized pursuant to plan and email correspondence with client parties regarding same (1.0); work on Daubert motion to exclude testimony of K. McNally (2.3); call with client parties regarding confirmation brief (1.2) and additional revisions to same (2.1); call with Committee counsel regarding exhibits and potential meeting in week of 6-8 (.4); additional work on deposition designations and motions in limine prior to filing of same (1.9).	11.00	$11,550.00
06/04/26	MDL	Revise A. Zimmerman declaration in support of plan confirmation (not ultimately filed).	0.30	$300.00
06/04/26	MDL	Strategize with S. Moses regarding Pacific Insurers' objection to Debtor filing an enlarged brief.	0.30	$300.00
06/04/26	MDL	Strategize with A. Uetz regarding declarations in support of plan confirmation.	0.20	$200.00
06/04/26	MDL	Analyze R. Rosen deposition transcript to identify additional testimony to be designated.	1.80	$1,800.00

06/04/26	MR	Various telephone discussions with various counsel regarding vote on fourth amended plan (1.8); revise drafts of witness declarations in advance of plan confirmation hearing (1.1).	2.90	$2,465.00
06/04/26	MRL	Continue drafting the deposition designations for the confirmation hearing.	1.50	$1,200.00
06/04/26	MRL	Continue revising the confirmation brief in support of the Debtor's plan to conform to M. Moore's comments.	1.60	$1,280.00
06/04/26	MRL	Email correspondence with the Foley team regarding the confirmation hearing.	0.20	$160.00
06/04/26	MRL	Continue drafting witness declarations for the confirmation hearing.	3.60	$2,880.00
06/04/26	NCW	Prepare exhibits to declaration in support of Debtor's motion to strike expert testimony of P. Shields.	1.40	$910.00
06/04/26	NCW	Revise notices of hearing regarding Debtor's motions in limine and motions to strike expert testimony.	1.10	$715.00
06/04/26	NCW	Revise proposed orders regarding Debtor's motions in limine and motions to strike expert testimony.	1.20	$780.00
06/04/26	NCW	Conduct legal research regarding issue related to Debtor's first motion in limine.	2.90	$1,885.00
06/04/26	NCW	Prepare exhibits for Debtor's first and second motions in limine.	0.70	$455.00
06/04/26	NCW	Draft proposed order regarding Debtor's motion to strike expert testimony of K. McNally.	0.20	$130.00
06/04/26	NCW	Revise Debtor's first and second motions to correctly reflect declaration exhibits.	1.20	$780.00

06/04/26	NMCG	Revise deposition designation of P. Shields (.7); revise Daubert motions for P. Shields and K. McNally including incorporating edits received from Foley team (3.0); revise three motions in limine to incorporate edits received from D. Goroff and A. Uetz (3.2); various calls with D. Goroff, N. Walsh and T. Dolcourt regarding revisions and research for motions in limine (.7); revise proposed orders for all discovery motions (.8); revise declarations in support of discovery motions (.8); correspond with N. Walsh regarding the same (.6).	9.80	$8,085.00
06/04/26	NMCG	Finalize notice of withdrawal for Debtor's motion to compel based on agreement with Committee (.4); draft declarations for direct testimony (1.0).	1.40	$1,155.00
06/04/26	SJM	Final review of motions in limine and declaration in support of same.	0.70	$647.50
06/04/26	SJM	Final review of P. Shield Daubert motion (.6); final review of K. McNally Daubert motion (.5).	1.10	$1,017.50
06/04/26	SJM	Work on response to Committee objections to plan confirmation.	1.30	$1,202.50
06/04/26	TND	Call with Foley, VeraCruz and client teams regarding privileged information needed for confirmation hearing (1.0); follow-up email detailing further information needed (.5); research on privileged matters for motion in limine (2.4).	3.90	$3,432.00
06/05/26	AMUE	Revisions to Debtor’s motions in limine to finalize for filing today.	2.80	$3,430.00
06/05/26	AMUE	Review confirmation brief for filing today.	1.20	$1,470.00
06/05/26	AMUE	Prepare for the direct testimony of Bishop Barber.	5.50	$6,737.50

06/05/26	DBG	Draft constitutional law section (5.0); Teams meeting with C. Moore, expert, regarding hearing testimony (also with S. Levitt and N. McGuffey) (.5); follow-up email from C. Moore attaching data (.1) review revised confirmation brief (1.0); strategize with M. Moore regarding confirmation brief (.3); conferences with M. Moore and M. Kemner regarding confirmation brief (.4); communications with M. Lee regarding Hilco testimony (.2); revise outline of Bishop Barber's testimony (.8); edit A. Bardos' declaration (.4); review E. Ridley's edits to A. Bardos' declaration (.1); communications with A. Uetz regarding A., Bardos' declaration and Bishop Barber's outline (.2).	9.00	$13,050.00
06/05/26	ERR	Edit declaration of A. Bardos regarding insurance issues.	0.80	$1,000.00
06/05/26	JCH	Prepare draft ex parte application to authorize filing of oversize confirmation brief and proposed order (.8); prepare draft notice of filing of declarations in support of plan confirmation (.5); prepare draft Moses declaration (.3); file ex parte application to authorize filing of oversize confirmation brief and declaration in support and upload proposed order (.5); revise confirmation brief to update table of contents and table of authorities (.6); email correspondence with Foley team regarding declarations (.4); prepare declarations in support of plan confirmation for filing (.8); additional updates to confirmation brief table of contents and table of authorities (.4); file confirmation brief, appendix under seal and notice of filing of declarations in support of plan confirmation (.5); file confirmation brief, appendix under seal and notice of filing of declarations in support of plan confirmation (.5); send .zip file of filed pleadings to Foley team (.2).	5.50	$2,310.00

06/05/26	MCM	Meeting with M. Rofaeil and N. Ortega regarding filings scheduled for Friday, June 5, including confirmation brief, appendix, and related exhibits (.7); continue working on trial brief prior to submission of same, including email and telephone correspondence with client parties regarding revisions (5.8); analysis of parishioner letters to include as exhibits to trial brief (.6); prepare for pretrial hearings and client meetings during week of 6-8 in San Francisco, including logistics of travel for trial team (3.0).	10.10	$10,605.00
06/05/26	MDL	Strategize with M. Moore regarding arguments in favor of plan confirmation for plan confirmation brief.	0.60	$600.00
06/05/26	MDL	Telephone conference with K. Martens regarding declaration in support of plan confirmation.	0.20	$200.00
06/05/26	MDL	Telephone conference with J. Hogan regarding his declaration in support of plan confirmation.	0.30	$300.00
06/05/26	MDL	Email exchange with J. Hogan regarding declaration in support of plan confirmation.	0.20	$200.00
06/05/26	MDL	Email exchange with K. Martens regarding declaration in support of plan confirmation.	0.20	$200.00
06/05/26	MDL	Revise portions of plan confirmation brief.	0.20	$200.00
06/05/26	MDL	Revise declaration of K. Martens in support of plan confirmation.	1.30	$1,300.00
06/05/26	MDL	Strategize with Foley team regarding declarations in support of plan confirmation.	1.20	$1,200.00
06/05/26	MDL	Draft declaration of J. Hogan in support of plan confirmation.	1.60	$1,600.00
06/05/26	MR	Continue strategizing for responses to Committee's requests for admission in chapter 11 proceedings (.7); telephone call with M. Holland regarding drafting of responses (.2).	0.90	$765.00
06/05/26	MRL	Call with S. Moses and M. Lee to finalize the declarations in support of the Debtor's plan.	0.30	$240.00
06/05/26	MRL	Continue drafting witness declarations for the confirmation hearing.	2.80	$2,240.00

06/05/26	MRL	Continue revising the confirmation brief in support of the Debtor's plan to conform to M. Moore's comments.	1.60	$1,280.00
06/05/26	MRL	Meeting with N. McGuffey, M. Moore, and N. Ortega regarding finalizing the confirmation brief.	0.70	$560.00
06/05/26	MRL	Draft the appendix in support of the confirmation brief.	0.80	$640.00
06/05/26	MRL	Call with D. Goroff and M. Moore regarding producing letters to the Committee.	0.20	$160.00
06/05/26	MRL	Email correspondence with the Foley team regarding preparations for the confirmation hearing.	0.30	$240.00
06/05/26	MRL	Draft the application to exceed the page limit for the confirmation brief.	0.50	$400.00
06/05/26	NMCG	Analyze the additional motions in limine filed by Committee and insurers filed in connection with upcoming confirmation hearing (1.8); meeting with M. Moore and M. Rofaeil to discuss upcoming deadlines and filings for the day (.6); finalize and serve supplemental production in connection with confirmation trial (.5); meeting with C. Moore, D. Goroff, and A. Uetz regarding direct testimony declaration (.5); finalize the C. Moore declaration (.8); finalize A. Bardos' declaration (1.2); various calls and correspondences with D. Goroff to discuss direct declarations of witnesses (.6); finalize other declarations to be filed (.6); discuss preparation for Bishop Barber's direct testimony with A. Uetz (.3); assist in finalizing the confirmation brief (2.5); begin draft outline for C. Moore (1.2).	10.60	$8,745.00
06/05/26	SJM	Supervise finalizing declarations in support of plan confirmation (.6); supervise finalizing brief in support of plan confirmation (.3).	0.90	$832.50
06/05/26	SJM	Review application for leave to exceed page limits for confirmation brief.	0.50	$462.50
06/05/26	SJM	Revise declaration of R. Gies in support of plan confirmation (.9); revise declaration of A. Currier (.7); calls with R. Manns regarding same (.3).	1.90	$1,757.50

06/05/26	SJM	Attention to approach to declarations in support of plan confirmation.	0.70	$647.50
06/05/26	SJM	Work on response to insurer objections to plan confirmation.	4.30	$3,977.50
06/06/26	DBG	Draft C. Moore direct exam (5.0); communications with N. McGuffey regarding C. Moore exam strategy and proof (1.0).	6.00	$8,700.00
06/06/26	MCM	Work on exhibit lists due Monday, 6-8, per scheduling order.	1.00	$1,050.00
06/06/26	MRL	Analyze bishop declarations in support of plans in other diocese cases (1.1); draft an email to A. Uetz regarding the same (.2).	1.30	$1,040.00
06/06/26	NMCG	Continue working on draft direct outline for C. Moore (6.5); discuss the same with D. Goroff (.2).	6.70	$5,527.50
06/06/26	TND	Email to M. Roberts on location of certain documents (.1); begin to prepare certain sections of outline for Bishop Barber's testimony (.3).	0.40	$352.00
06/07/26	AMUE	Prepare for trial - testimony outline for Bishop Barber (3.0) and for Dan Flanagan (3.0).	6.00	$7,350.00
06/07/26	DBG	Draft C. Moore's direct examination.	6.00	$8,700.00
06/07/26	DBG	Draft opening statement (1.0); conference with A. Uetz regarding M. Babcock's testimony (.2).	1.20	$1,740.00
06/07/26	ERR	Begin to review in limine motions and provide initial insurance analysis regarding response thereto.	3.00	$3,750.00
06/07/26	ERR	Edit A. Bardos' direct examination regarding trial on plan confirmation.	1.00	$1,250.00
06/07/26	MCM	Prepare for pretrial hearings on 6/8 in connection with RCBO confirmation hearings and later hearings on motions in limine and motions to exclude, as well as client preparation meetings during week of 6/8.	5.50	$5,775.00
06/07/26	NMCG	Discuss WIP with M. Rofaeil in connection with upcoming confirmation hearing (.4); work on Bishop Barber's direct outline (4.6); update exhibit list (1.1); continue working on C. Moore's outline (2.4); various correspondences with D. Goroff regarding the same (.5).	9.00	$7,425.00

06/07/26	SJM	Work on issues for non-debtor Catholic entity cross-examination.	2.10	$1,942.50
06/07/26	SJM	Continue to analyze issues regarding motion in limine responses in light of comments from D. Goroff.	0.70	$647.50
06/07/26	TND	Email to N. McGuffey with information on state court trial expenses and fees (.1); further work on Bishop Barber's outline (.3).	0.40	$352.00
06/08/26	AMUE	Prepare for confirmation trial (witness outlines and exhibits).	5.50	$6,737.50
06/08/26	DBG	Revise C. Moore's examination (3.0); session with C. Moore, S. Levitt, and N. McGuffey regarding C. Moore's direct examination preparation (1.5); draft opening statement and review materials regarding same (1.5); strategy session led by A. Uetz for court presentation (1.5); preparation regarding A. Bardos' meeting/testimony (.8).	8.30	$12,035.00
06/08/26	MCM	Confer with opposing counsel regarding extension of exhibit deadline to Tuesday, June 9, and email correspondence confirming same (.4); prepare for hearing on pretrial order and related pretrial issues and participate in same (3.0); work on trial logistics with Foley team, including daily rough transcripts (1.5); attention to issues concerning stipulation on plan real property and discussion with Foley team (1.4); trial preparation with Foley team and client parties (4.0).	10.30	$10,815.00
06/08/26	MDL	Strategize with Foley team regarding opposition to Committee and insurer motions in limine.	1.40	$1,400.00
06/08/26	MDL	Email exchange with Verita team and J. Hogan regarding plan vote issue.	0.30	$300.00
06/08/26	MDL	Strategize with Foley team regarding exhibit list for plan confirmation hearing.	0.40	$400.00
06/08/26	MDL	Strategize with Foley team regarding opposition to Committee's motion to exclude K. Martens.	0.60	$600.00
06/08/26	MDL	Strategize regarding revisions to plan confirmation trial witness list.	0.40	$400.00
06/08/26	MDL	Prepare for pretrial hearing.	1.80	$1,800.00

06/08/26	MDL	Strategize with Foley team for C. Moore's direct examination.	1.00	$1,000.00
06/08/26	MDL	Draft stipulation with Committee regarding vote designation resolution.	1.10	$1,100.00
06/08/26	MHH	Draft responses to requests for admission issued by Committee.	2.60	$1,950.00
06/08/26	MR	Revise draft written discovery responses in chapter 11 proceedings, in relation to discovery on plan confirmation (.7); further telephone discussions with various counsel regarding vote on fourth amended plan (.9).	1.60	$1,360.00
06/08/26	MRL	Email correspondence with the Foley team regarding revisions to the pretrial order.	0.20	$160.00
06/08/26	MRL	Analyze the draft of the exhibit list for the confirmation hearing.	0.20	$160.00
06/08/26	MRL	Team call with the Foley team to prepare for the pretrial hearing (1.5); follow up on same (.4).	1.90	$1,520.00
06/08/26	MRL	Draft the counter-deposition designations and objections for the Committee's deposition designations.	3.50	$2,800.00
06/08/26	NMCG	Prepare for meeting with C. Moore regarding witness prep (.7); meeting with C. Moore for witness preparations with D. Goroff (1.5); analyze deposition transcripts in connection with preparing counter-deposition designations (2.7); work on counter-designations in response to Committee's and insurers' deposition designations (1.6); analyze M. Babcock's depositions in connection with preparing deposition designation (2.4); prepare deposition designation for M. Babcock (1.6); Foley meeting to discuss pretrial order and strategize on confirmation trial preparations (1.5); work on exhibit list for confirmation hearing (1.2); various correspondence with Foley team regarding the same (.4).	13.60	$11,220.00
06/08/26	SJM	Work on finalizing estimated restricted asset amounts for stipulation with Committee.	1.20	$1,110.00
06/08/26	SJM	Assist with preparation for pretrial hearing.	0.80	$740.00

06/08/26	SJM	Revise stipulation regarding vote designation.	0.40	$370.00
06/09/26	AMUE	Prepare for contested confirmation trial (focus on exhibits and deposition designations).	3.50	$4,287.50
06/09/26	AMUE	Meeting with R. Manns and A. Currier regarding contested confirmation trial.	2.00	$2,450.00
06/09/26	AMUE	Prepare for contested confirmation trial focused on finalizing trial exhibit list.	2.20	$2,695.00
06/09/26	AMUE	Revisions to counter-designations of deposition testimony (Bishop Barber).	2.00	$2,450.00
06/09/26	AMUE	Meeting with A. Bardos, D. Goroff, and VeraCruz to prepare for contested confirmation trial.	3.50	$4,287.50
06/09/26	DBG	Prepare A. Bardos for testimony, with A. Uetz and M. Moore (3.5); review materials regarding same (1.9); draft opening statement (.5); review exhibit list (.5); team call regarding exhibit list (1.0): review Babcock designations (1.5); communications with N. McGuffey regarding same (.2); review A. Uetz updated outline regarding Bishop Barber's presentation (.2).	9.30	$13,485.00
06/09/26	ERR	Review exhibits for confirmation trial.	0.80	$1,000.00
06/09/26	ERR	Review insurer designations of A. Bardos' declaration and identify counter-designations.	3.00	$3,750.00
06/09/26	ERR	Review filings regarding in limine motions, designations and objections.	1.50	$1,875.00
06/09/26	MCM	Trial preparation and client meetings in Foley's San Francisco offices, including meetings with A. Bardos and other witnesses as preparation (5.0); Foley team meeting to finalize exhibit list prior to submission of same (2.0); updates to task lists and preparation for oral argument on 6-12 on all motions in limine and/or motions to exclude certain witnesses or testimony (2.8); work on counter-designations for various witnesses and objections to counter-designations to be submitted by other parties (1.2).	11.00	$11,550.00
06/09/26	MDL	Evaluate which documents to use as exhibits for K. Martens' testimony.	1.30	$1,300.00
06/09/26	MDL	Revise stipulation with Committee regarding vote designation resolution.	0.90	$900.00

06/09/26	MDL	Strategize with Foley team regarding stipulations with Committee on real property collateral/sale designations for plan confirmation purposes and vote designation resolution.	1.10	$1,100.00
06/09/26	MDL	Strategize with Foley team regarding exhibits to be used with each witness we intend to call at trial.	1.50	$1,500.00
06/09/26	MDL	Email exchange with R. Manns (Norton Rose Fulbright) regarding terms of real property stipulation with Committee.	0.20	$200.00
06/09/26	MDL	Strategize with Foley team regarding opposition to motion to exclude K. Martens' testimony.	0.80	$800.00
06/09/26	MDL	Revise counter-designations for A. Bardos' deposition transcripts.	1.20	$1,200.00
06/09/26	MDL	Evaluate settlement options in advance of plan confirmation hearing.	1.50	$1,500.00
06/09/26	MDL	Revise stipulation with Committee regarding real property collateral/sale designations for plan confirmation purposes.	0.80	$800.00
06/09/26	MHH	Draft responses to requests for admission issued by Committee.	2.90	$2,175.00
06/09/26	MR	Review Committee's A. Bardos deposition designations and revise draft of objections and counter-designations (.4); further telephone discussions with various counsel regarding vote on fourth amended plan (.7); continue drafting responses to various written discovery requests from Committee and insurers in connection with plan confirmation proceedings (1.4); comment on draft of exhibit list for plan confirmation hearing (.2).	2.70	$2,295.00
06/09/26	MRL	Continue drafting the counter-deposition designations and objections for the Committee's deposition designations.	2.00	$1,600.00
06/09/26	MRL	Analyze the exhibit list for the confirmation hearing.	0.70	$560.00
06/09/26	MRL	Email correspondence with D. Martin regarding the confirmation hearing.	0.10	$80.00

06/09/26	MRL	Team call with the Foley team to discuss the exhibit list for the confirmation hearing (partial).	1.50	$1,200.00
06/09/26	MRL	Revise the deposition designations for M. Babcock.	0.40	$320.00
06/09/26	NCW	Conduct legal research regarding objections to deposition designations for confirmation hearing.	0.70	$455.00
06/09/26	NMCG	Finalize deposition counter-designations in connection with Committee's and insurers' deposition designations (1.6); correspondence with E. Ridley and M. Roberts regarding the insurance designations (.3); finalize M. Babcock's deposition designation (.4); correspond with D. Goroff regarding the same (.3); analyze Committee and insurer counter-designations in response to Debtor's designations (.4); discuss with Foley team regarding the same (.2); participate in A. Bardos' witness preparations (3.6); finalize exhibit list in connection with confirmation hearing (3.6); meeting with Foley team to discuss exhibits and strategy for confirmation hearing (1.9).	12.30	$10,147.50
06/09/26	SJM	Review draft exhibit list.	0.30	$277.50
06/09/26	SJM	Finalize Debtor's exhibit list.	0.30	$277.50
06/09/26	SJM	Analyze issues regarding potential Committee stipulation regarding voting.	0.30	$277.50
06/09/26	SJM	Review deposition counter-designations and responses (2.2); serve same on parties (.3).	2.50	$2,312.50
06/09/26	SJM	Outline potential cross-exam topics regarding RCWC.	2.30	$2,127.50
06/09/26	SJM	Meet with R. Gies and R. Manns regarding trial preparation.	1.60	$1,480.00
06/09/26	SJM	Meet with case team regarding trial exhibits (partial).	1.50	$1,387.50
06/09/26	SJM	Analyze potential cross-exam topics for RCC.	1.20	$1,110.00
06/09/26	SJM	Call with R. Manns regarding RCC and RCWC testimony (.6); meet with A. Currier, R. Manns, and A. Uetz regarding Currier trial testimony (2.0).	2.60	$2,405.00

06/10/26	AMUE	Provide advice to Foley team regarding trial exhibits (.5) and deposition designations (.5).	1.00	$1,225.00
06/10/26	AMUE	Prepare for (2.0) and meet with Bishop Barber, M. Kemner, A. Bardos and D. Goroff to prepare for trial (6.5).	8.50	$10,412.50
06/10/26	AMUE	Meeting with M. Moore, S. Moses and D. Goroff (partial) to strategize regarding MILs, exhibits and deposition designations.	2.00	$2,450.00
06/10/26	AMUE	Analyze issues relating to trial exhibits.	1.20	$1,470.00
06/10/26	DBG	Prepare Bishop Barber with A. Uetz for trial testimony (6.8); revise oppositions to motions in limine (1.0); strategy meeting led by A. Uetz with S. Moses and M. Moore (1.0); edit C. Moore's direct examination (.8); conferences with N. McGuffey regarding C. Moore's direct examination (.4).	10.00	$14,500.00
06/10/26	ERR	Prepare for and attend trial testimony preparation of Bishop Barber.	2.00	$2,500.00
06/10/26	ERR	Begin review of additional briefing by Committee and insurers regarding in limine motions and exhibits.	1.00	$1,250.00
06/10/26	ERR	Review potential objections to insurer exhibits.	1.00	$1,250.00
06/10/26	ERR	Edit brief in opposition to Committee and insurer in limine motions.	1.00	$1,250.00
06/10/26	JCH	Pull and save copies of Committee's confirmation exhibits (1.0); prepare draft of Debtor and Committee joint confirmation exhibit list (1.5).	2.50	$1,050.00

06/10/26	MCM	Analysis of legal issues in connection with deposition designations for expert witnesses in connection with Rule 32 (.6); email and telephone conferences with various witnesses regarding preparation for testimony and trial issues (1.6); analysis of various filed exhibit lists and reconciliation of same against Debtor's (2.5); meeting with Committee counsel regarding trial exhibits (2.5); meetings with Foley team regarding trial issues and exhibits (2.0); email correspondence with Committee counsel regarding trial exhibits listed but not delivered (.5); prepare for hearings on 6-12 regarding motions in limine and related issues (1.0); analysis of pretrial order issues and email correspondence with Committee regarding same (.6).	11.30	$11,865.00
06/10/26	MDL	Revise brief in opposition to motion in limine to exclude K. Martens.	1.20	$1,200.00
06/10/26	MDL	Strategize with M. Moore and S. Moses regarding objections to Committee and insurer exhibits.	1.20	$1,200.00
06/10/26	MR	Comment on insurers' exhibit list for plan confirmation hearing (.6); further telephone discussions with various counsel regarding vote on fourth amended plan (.8); draft responses to Committee's and insurers' written discovery requests in connection with plan confirmation (.9); attend strategy call regarding plan confirmation hearing with M. Lee, E. Ridley, N. McGuffey and M. Rofaeil (.6).	2.90	$2,465.00
06/10/26	MRL	Email correspondence with the Foley team regarding the confirmation hearing.	0.10	$80.00
06/10/26	MRL	Analyze deposition transcripts for Bishop Barber's preparation.	1.00	$800.00
06/10/26	MRL	Call with the Foley team regarding the status of the case.	0.60	$480.00
06/10/26	MRL	Email correspondence with the Foley team regarding the exhibit list for the confirmation hearing.	0.50	$400.00
06/10/26	MRL	Draft an objection to K. McNally's declaration to the plan.	1.40	$1,120.00

06/10/26	MRL	Strategize with M. Lee, M. Moore, and N. McGuffey regarding the responses to the discovery motions.	0.40	$320.00
06/10/26	MRL	Email correspondence with D. Martin regarding the confirmation hearing.	0.10	$80.00
06/10/26	MRL	Confer with N. McGuffey regarding the objections to the declarations.	0.20	$160.00
06/10/26	NCW	Prepare omnibus response to Committee objections to deposition designations for confirmation hearing.	1.80	$1,170.00
06/10/26	NCW	Continue legal research regarding objections to deposition designations for confirmation hearing.	0.40	$260.00
06/10/26	NMCG	Continue to work on finalizing the exhibit list and documents (3.2); call with M. Roberts and E. Ridley regarding various exhibits to be finalized (.5); correspond with Foley team regarding insurers and other outstanding objections (.4); meet and confer with Committee counsel, M. Moore, and S. Moses regarding joint exhibit lists and potential stipulations (1.3); revise omnibus discovery response to motions in limine (.6); prepare declaration in support of opposition to Daubert motion (.8); assist with finalizing responses to discovery motions (.7); correspond with Foley team regarding finalizing responses (.3); begin preparing deposition designations and objections to be filed (.4).	8.20	$6,765.00
06/10/26	NMCG	Meeting with M. Lee, M. Rofaeil, M. Roberts, and E. Ridley regarding overall trial strategy.	0.60	$495.00
06/10/26	NMCG	Work on C. Moore's direct outline (2.3); correspond with C. Moore in connection with witness preparations for confirmation hearing (.6).	2.90	$2,392.50
06/10/26	SJM	Call with A. Uetz regarding approach to deposition designations.	0.30	$277.50
06/10/26	SJM	Assist with Bishop Barber's deposition preparation.	0.80	$740.00
06/10/26	SJM	Attend trial preparation meeting.	0.60	$555.00
06/10/26	SJM	Meet with Committee regarding exhibits and related issues.	3.00	$2,775.00

06/10/26	TND	Provide information needed for confirmation trial preparation to N. McGuffey.	0.20	$176.00
06/11/26	AMUE	Help team prepare for hearing on pretrial motions.	1.50	$1,837.50
06/11/26	AMUE	Strategize regarding trial exhibits (3.2); draft witness testimony outlines (4.1).	7.30	$8,942.50
06/11/26	DBG	Review oppositions to motions in limine, Daubert motions and prepare oral argument regarding same.	2.00	$2,900.00
06/11/26	ERR	Edit 345 responses to admissions served by Committee.	2.00	$2,500.00
06/11/26	ERR	Review potential exhibits for confirmation trial.	3.00	$3,750.00
06/11/26	JCH	Revise joint exhibit list for confirmation hearing (.8); pull and label Debtor's confirmation exhibits (1.5).	2.30	$966.00
06/11/26	MCM	Preparation for hearing on motions in limine and to exclude certain witnesses scheduled for June 12 and including pretrial issues (5.0); meeting with Foley team regarding insurance exhibits and related issues (.6); trial preparation in advance of Monday opening (1.5); finalize oppositions to various declarations and responses to same (2.0); attention to insurance issues in connection with confirmation (1.0).	10.10	$10,605.00
06/11/26	MDL	Evaluate revised stipulation with Committee on vote designations.	0.20	$200.00
06/11/26	MDL	Strategize with Foley team regarding witness order and subjects of direct testimony at confirmation trial.	1.90	$1,900.00
06/11/26	MDL	Strategize with Foley team regarding exhibits for plan confirmation trial.	0.30	$300.00
06/11/26	MDL	Email exchange with C. Restel (Lowenstein) regarding stipulation with Committee on vote designations.	0.10	$100.00

06/11/26	MR	Analyze various pretrial filings and submissions in furtherance of insurance-related aspects of plan confirmation (2.1); complete revisions to responses to Committee's RFAs (.9); analyze key information regarding insurance coverage issues for E. Ridley, in preparation for witness examinations at plan confirmation hearing (.4).	3.40	$2,890.00
06/11/26	MRL	Analyze documents to the exhibit list for the confirmation hearing.	3.20	$2,560.00
06/11/26	MRL	Call with Foley administration team regarding preparations for the confirmation hearing.	0.30	$240.00
06/11/26	MRL	Revise the tabulation declaration for the votes on the plan.	0.20	$160.00
06/11/26	MRL	Continue drafting the objection to K. McNally's declaration to the plan.	2.20	$1,760.00
06/11/26	MRL	Confer with N. McGuffey and N. Ortega regarding finalizing the exhibit list for the confirmation hearing.	0.20	$160.00
06/11/26	MRL	Call with A. Uetz and N. McGuffey regarding preparations for the confirmation hearing.	0.60	$480.00
06/11/26	MRL	Email correspondence with the Foley team regarding preparation for the confirmation hearing.	0.60	$480.00
06/11/26	MRL	Analyze the Rosen declaration to the plan.	1.00	$800.00
06/11/26	MRL	Call with A. Uetz, M. Lee, and N. McGuffey regarding the exhibit list for the confirmation hearing.	0.40	$320.00
06/11/26	NMCG	Prepare for meeting with C. Moore and D. Goroff regarding upcoming confirmation hearing (.4); meeting with C. Moore and D. Goroff regarding upcoming confirmation trial (1.1); follow-up correspondence with C. Moore regarding the same (.5); correspond with D. Goroff regarding C. Moore's testimony and other outstanding items (.2).	2.20	$1,815.00

06/11/26	NMCG	Continue working on exhibit lists and documents to prepare for trial, including revising exhibit list, collection of documents and verifying with other team members regarding relevancy (6.6); call with M. Roberts regarding relevant documents for confirmation hearing (.3); various correspondence with A. Uetz, M. Rofaeil, and other Foley members about exhibits and witness preparations (.6); various calls and correspondences with M. Rofaeil, J. Harrison, and others regarding exhibits and other upcoming filings to prepare for in connection with confirmation trial (1.1); finalize exhibits and provide to opposing counsel (1.3); prepare deposition designations for P. Shields, K. McNally, and R. Rosen to be filed (1.2); various correspondence with Foley team regarding the same (.5).	11.60	$9,570.00
06/11/26	SJM	Finalize vote designation stipulation.	0.20	$185.00
06/11/26	SJM	Email to all parties regarding combined exhibit list.	0.40	$370.00
06/11/26	SJM	Work on finalizing exhibits for trial.	3.00	$2,775.00
06/11/26	SJM	Direct N. McGuffey and M. Rofaeil regarding preparation of deposition designations.	0.80	$740.00
06/11/26	SJM	Call with M. Lee regarding approach to argument on motion to exclude K. Martens' declaration.	0.30	$277.50
06/11/26	SJM	Analyze insurer objection to declaration of D. Martin.	0.60	$555.00
06/11/26	SJM	Respond to email regarding vote designation stipulation.	0.30	$277.50
06/11/26	SJM	Meet with M. Moore and D. Goroff regarding preparation for hearing on motions in limine and related pretrial issues.	0.80	$740.00
06/11/26	SJM	Revise draft pretrial order (.4); email to parties regarding same (.1).	0.50	$462.50
06/11/26	TND	Provide information to N. McGuffey on various issues for confirmation trial.	0.40	$352.00
06/12/26	AMUE	Prepare for trial regarding witness outlines.	3.80	$4,655.00
06/12/26	ERR	Review trial admission issues regarding insurer exhibits.	0.70	$875.00

06/12/26	ERR	Finalize responses to 345 admissions from Committee.	1.50	$1,875.00
06/12/26	GSG	(No Charge) Correspond with S. Moses regarding Committee motion and impact on restricted assets issue.	0.20	$0.00
06/12/26	JCH	File declaration regarding tabulation of plan ballots (.2); prepare notice of withdrawal of Bardos declaration in support of plan confirmation (.2); file sealed version of declaration with Class 4 ballots attached (.2); revisions to combined witness and exhibit list (.5); email correspondence with Foley team regarding same (.5); add exhibit labels to Debtor exhibits (1.8).	3.40	$1,428.00
06/12/26	MCM	Strategize with Foley team regarding confirmation issues.	1.00	$1,050.00
06/12/26	MCM	Analyze draft opening statement and witness outline for C. Moore, Debtor's financial expert.	1.50	$1,575.00
06/12/26	MDL	Strategize with S. Moses for hearing on motion in limine to exclude K. Martens.	0.20	$200.00
06/12/26	MDL	Email exchange with J. Satter and A. Zimmerman (both of Hilco) regarding preparations for their trial testimony.	0.20	$200.00
06/12/26	MR	Finalize responses to Committee's RFAs (.5); draft privileged analysis relating to insurers' revised exhibit list for plan confirmation hearing (.8).	1.30	$1,105.00
06/12/26	MRL	Continue analyzing documents to the exhibit list for the confirmation hearing.	1.40	$1,120.00
06/12/26	MRL	Draft notes from the hearing to the Foley team.	0.30	$240.00
06/12/26	MRL	Revise the Verita declaration in support of solicitation of the plan.	0.50	$400.00
06/12/26	MRL	Email correspondence with the Foley team regarding logistics for the confirmation hearing.	0.60	$480.00
06/12/26	MRL	Email correspondence with the Foley team regarding preparations for witness preparations.	0.10	$80.00
06/12/26	MRL	Email correspondence with the Foley team regarding the pretrial order.	0.30	$240.00

06/12/26	NMCG	Correspond with M. Roberts regarding Debtor's responses to requests for admission (.3); serve responses regarding the same (.2).	0.50	$412.50
06/12/26	NMCG	Revise C. Moore outline for direct testimony (3.4); prepare exhibits for C. Moore and Bishop Barber (.5); various discussions regarding the same with D. Goroff and A. Uetz (.4); call with A. Uetz regarding outstanding issues regarding exhibits and exhibit list in connection with joint exhibit list with Committee and insurers (.3); various correspondences with A. Uetz and other Foley team members regarding strategy with insurers and related exhibits (.4); call with C. Moore regarding update from motion in limine hearing (.3); various other correspondence with C. Moore and D. Goroff regarding witness preparations (.3); finalize deposition designation of M. Babcock (1.2).	6.80	$5,610.00
06/12/26	SJM	Update draft pretrial order.	0.60	$555.00
06/12/26	SJM	Assist with identification of Debtor exhibits and finalizing exhibit list.	1.90	$1,757.50
06/12/26	SJM	Prepare for hearing on motions in limine.	2.70	$2,497.50
06/12/26	TND	Email correspondence with N. McGuffey on fee information for confirmation hearing.	0.10	$88.00
06/13/26	DBG	Continue drafting opening statement and review hearing transcripts, factual record and law regarding same (4.1); communications with N. McGuffey regarding opening statement (.4); communications with M. Moore regarding Committee stipulation regarding experts (.1); communications with M. Rofaeil regarding Friday hearing transcript (.1); communications with N. McGuffey regarding C. Moore witness preparation (.3).	5.00	$7,250.00
06/13/26	MRL	Email correspondence with the Foley team regarding the exhibit list.	0.40	$320.00
06/13/26	MRL	Analyze the hearing transcript from Friday's hearing to provide an update to the Foley team.	1.60	$1,280.00

06/13/26	MRL	Email correspondence with the Foley team regarding preparations for the confirmation hearing.	0.30	$240.00
06/13/26	NMCG	Prepare for meeting with C. Moore (.2); meeting with C. Moore to prepare for upcoming confirmation hearing (1.6); various correspondences with D. Goroff to discuss preparations (.3); revise C. Moore outline (2.5); various correspondences with Foley team regarding exhibits and other outstanding items (.3); revise opening statement (1.6).	6.50	$5,362.50
06/14/26	AMUE	Work on direct exam testimony (3.6); provide advice relating to the Debtor's opening statement (2.2); review trial brief to cross-check facts needed from certain witnesses (1.8); review trial exhibits to prepare for trial (2.0).	9.60	$11,760.00
06/14/26	DBG	Revise C. Moore outline and review exhibits (6.0); prepare C. Moore for expert witness testimony (2.0); draft opening statement and address team revisions (5.0).	13.00	$18,850.00
06/14/26	JT	Preparation of witness binders (4.4); review witness outline and prepare exhibits to be used at hearing (1.8).	6.20	$2,852.00
06/14/26	MCM	Preparation for confirmation hearings dated 6/15 and beyond with Foley team, including witness preparation, logistics, strategy conference, and revisions to opening statement and witness outlines.	10.50	$11,025.00
06/14/26	MDL	Prepare for first day of confirmation trial with Foley team.	2.90	$2,900.00
06/14/26	MDL	Revise opening statement draft.	0.90	$900.00
06/14/26	MRL	Call with the Committee and insurers regarding the exhibit list.	1.40	$1,120.00
06/14/26	MRL	Analyze documents in preparation for the redirect of D. Martin.	0.40	$320.00
06/14/26	MRL	Analyze the opening statement for the confirmation hearing.	0.50	$400.00
06/14/26	MRL	Analyze the Class 4 ballots to share with the insurers.	1.00	$800.00

06/14/26	MRL	Analyze Bishop Barber's speech transcript to provide an update to A. Uetz.	0.40	$320.00
06/14/26	MRL	Various email correspondence and communications with the Foley team regarding preparations for the confirmation hearing.	1.50	$1,200.00
06/14/26	MRL	Email correspondence with the Foley team regarding revisions to the confirmation order.	0.30	$240.00
06/14/26	MRL	Email correspondence with D. Martin regarding preparations for the confirmation hearing.	0.20	$160.00
06/14/26	MRL	Email correspondence with the Foley team regarding the exhibit list.	0.40	$320.00
06/14/26	NMCG	Meeting with C. Moore in connection with trial preparations (1.5); various calls regarding the same with C. Moore and D. Goroff (.3); continue revising C. Moore outline in connection with witness preparations (4.5); meet and confer regarding stipulation for exhibits with Foley team, Committee, and insurers (1.0); revise opening statement and discuss with D. Goroff regarding the same (1.2).	8.50	$7,012.50
06/14/26	SJM	Work on preparation for plan confirmation trial.	5.60	$5,180.00
06/14/26	SJM	Prepare for meet and confer regarding trial exhibits (1.1); participate in meet and confer (1.0).	2.10	$1,942.50
06/15/26	DBG	Draft C. Moore exam and review exhibits (2.0); attend team meeting regarding strategy for second day of trial (1.5).	3.50	$5,075.00
06/15/26	ERR	Review evidence and testimony regarding plan confirmation, particularly regarding insurance issues.	3.00	$3,750.00
06/15/26	MDL	Prepare for first day of plan confirmation trial.	2.50	$2,500.00
06/15/26	MDL	Strategize with Foley team regarding developments from first day of confirmation trial and responses to same.	2.20	$2,200.00
06/15/26	MR	Continue drafting responses and objections to RFAs from CNA and the London Market Insurers, in connection with plan confirmation hearing.	1.10	$935.00
06/15/26	MRL	Analyze hearing transcripts regarding insurance assets.	1.50	$1,200.00

06/15/26	MRL	Analyze documents to provide for the Hilco team.	0.40	$320.00
06/15/26	MRL	Draft a daily report of the first day of the confirmation trial for the client.	1.00	$800.00
06/15/26	MRL	Confer with the Foley team regarding preparations for the confirmation trial.	1.00	$800.00
06/15/26	NMCG	Additional preparations for post-trial day 1, including additional witness preparations and outlining for Bishop Barber and assist with redirect for C. Moore.	3.00	$2,475.00
06/15/26	NMCG	Prepare for trial, including additional witness preparations and transmitting exhibits with opposing counsel regarding individual witnesses binders.	2.70	$2,227.50
06/15/26	SJM	Assist with preparation for day two of trial.	4.70	$4,347.50
06/16/26	MDL	Evaluate second day of trial with Foley team.	1.00	$1,000.00
06/16/26	MDL	Analyze proposed stipulation on admissibility and import of insurance policies at confirmation trial.	0.10	$100.00
06/16/26	MDL	Prepare for second day of confirmation trial.	2.30	$2,300.00
06/16/26	MR	Comment on insurers' proposed stipulation regarding insurance policy documents. (.2); complete drafts of responses and objections to RFAs from CNA and the London Market Insurers, in connection with plan confirmation hearing (.8); perform privileged analysis in furtherance of trial strategy for chapter 11 plan confirmation proceedings (1.3).	2.30	$1,955.00
06/16/26	NMCG	Prepare for trial, including additional witness preparations for Bishop Barber and transmitting exhibits with opposing counsel regarding individual witness binders.	2.60	$2,145.00
06/17/26	AMUE	Debrief from first two days of trial (1.0); analyze issues from trial (1.2).	2.20	$2,695.00
06/17/26	AMUE	Prepare for second week of witness testimony and review of exhibits relating to same.	3.20	$3,920.00
06/17/26	DBG	Team strategy call regarding witnesses.	0.80	$1,160.00
06/17/26	MCM	Conference call with Foley team regarding case status and strategy.	1.00	$1,050.00

06/17/26	MCM	Prepare for continued trial days on June 22-26 in confirmation hearings in Roman Catholic Bishop of Oakland bankruptcy case, including team meetings (1.0) and client discussions (2.0); analysis of day one and two transcripts (.8).	3.80	$3,990.00
06/17/26	MDL	Strategize with Foley team for trial sessions 6/22-6/26.	0.90	$900.00
06/17/26	MRL	Draft cross-examination questions for D. Martin for preparation for the confirmation hearing.	1.40	$1,120.00
06/17/26	MRL	Email correspondence with NERA regarding D. Martin's testimony preparations.	0.30	$240.00
06/17/26	MRL	Call with the Foley team to discuss the witness list for the confirmation hearing (partial).	0.70	$560.00
06/17/26	MRL	Correspondence with the Foley team regarding preparations for the confirmation hearing.	0.20	$160.00
06/17/26	MRL	Draft a daily report of the second day of the confirmation trial for the client.	0.70	$560.00
06/17/26	NMCG	Team meeting to discuss additional trial preparations (1.0); continue working on additional trial preparations, including witness preparations, scheduling, and other outstanding issues (2.0).	3.00	$2,475.00
06/17/26	SJM	Review testimony from first two days of trial and analyze approach to further witnesses (1.2); meeting with trial team regarding same (1.0).	2.20	$2,035.00
06/17/26	SJM	Analyze issues for A. Currier testimony.	1.60	$1,480.00
06/18/26	AMUE	Prepare for (2.1) and meet with D. Flanagan and A. Bardos to prepare for trial testimony (2.0).	4.10	$5,022.50
06/18/26	AMUE	Prepare for trial - cross-examination issues.	2.80	$3,430.00
06/18/26	DBG	Assist with Flanagan prep (1.0); prepare for A. Bardos direct (1.0).	2.00	$2,900.00
06/18/26	MCM	Witness preparation with D. Martin in advance of testimony (.7); work on redirect outline for same (.5); preparation with Hilco witnesses (1.0); meeting with Foley team regarding trial progress and exhibits (1.4); prepare for day 3 of hearings on 6-22 (.9).	4.50	$4,725.00
06/18/26	MDL	Prepare D. Flanagan for trial testimony.	1.40	$1,400.00

06/18/26	MDL	Prepare J. Satter and R. Zimmerman for trial testimony.	1.50	$1,500.00
06/18/26	MDL	Strategize with M. Moore regarding 1129(a)(11) evidence.	0.20	$200.00
06/18/26	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) regarding RCC collateral question.	0.10	$100.00
06/18/26	MR	Comment on proposed stipulation from insurers in chapter 11 plan confirmation proceedings (.3); in relation to plan confirmation hearing, review materials produced in discovery in furtherance of privileged strategy matters regarding witness testimony (.9).	1.20	$1,020.00
06/18/26	MRL	Continue drafting the redirect examination questions for D. Martin.	0.60	$480.00
06/18/26	MRL	Email correspondence with NERA regarding the confirmation trial.	0.10	$80.00
06/18/26	MRL	Call with the Foley and Hilco teams regarding preparations for the confirmation trial.	1.50	$1,200.00
06/18/26	MRL	Confer with M. Moore regarding drafting the amended declaration for Verita.	0.10	$80.00
06/18/26	MRL	Analyze the Rosen analysis versus the Satter analysis.	0.90	$720.00
06/18/26	MRL	Call with the Foley team and Denise Martin regarding preparations for her testimony in the confirmation trial.	0.60	$480.00
06/18/26	NMCG	Participate in witness preparation meetings with Hilco and Foley team (1.5); discuss witness preparations and direct outlines for Hilco with Foley team (.7); witness preparation meeting with D. Flanagan and Foley team (2.0); prepare D. Flanagan outline and notes post-meeting for Foley team review (2.8); begin working on outline for Hilco (1.0).	8.00	$6,600.00
06/18/26	SJM	Witness preparation meeting with R. Gies.	0.70	$647.50

06/18/26	SJM	Prepare for witness preparation meeting with Hilco (.8); witness preparation meeting with J. Satter, A. Zimmerman, and M. Lee (1.4); follow-up meeting with M. Lee (.3); analyze issues related to real property collateral (.3).	2.80	$2,590.00
06/18/26	SJM	Analyze approach to real property collateral based on Hilco reports and anticipated Committee strategy.	1.30	$1,202.50
06/19/26	AMUE	Meeting with A. Bardos, VeraCruz and D. Goroff to prepare for trial testimony (1.4) (partial); communications with V. Rojas regarding Bishop Barber (.3); review communications received from client leadership regarding privileged issue (.8).	2.50	$3,062.50
06/19/26	DBG	Prepare for A. Bardos prep (1.1); A. Bardos prep (1.6).	2.70	$3,915.00
06/19/26	ERR	Review trial exhibits regarding RCBO.	1.50	$1,875.00
06/19/26	MCM	Continue trial preparation for second week, including preparation with certain witnesses.	5.20	$5,460.00
06/19/26	MDL	Evaluate potential trade-offs with Committee for pulling K. Martens from witness list.	0.10	$100.00
06/19/26	MDL	Telephone conference with J. Satter (Hilco) and Foley team regarding preparation for trial testimony.	1.20	$1,200.00
06/19/26	MDL	Telephone conference with A. Zimmerman (Hilco) and Foley team regarding preparation for trial testimony.	1.40	$1,400.00
06/19/26	MDL	Strategize with Foley team regarding anticipated insurer cross-examination of Bishop Barber.	0.30	$300.00
06/19/26	MRL	Began drafting the direct examination questions of J. Satter.	0.40	$320.00
06/19/26	MRL	Call with the Foley team and A. Zimmerman regarding his testimony for the confirmation trial.	1.50	$1,200.00
06/19/26	MRL	Email correspondence with the Foley team regarding the confirmation trial.	0.20	$160.00
06/19/26	MRL	Call with the Foley team and J. Satter regarding his testimony for the confirmation trial.	1.20	$960.00

06/19/26	NMCG	Attend witness prep for A. Bardos (1.5); attend witness preparation for A. Zimmerman (partial) (1.0); correspond with Foley team regarding the same (.5); attention to other trial prep issues (.8).	3.80	$3,135.00
06/19/26	SJM	Review documents and draft potential questions for witness preparation (2.1); participate in witness preparation meeting with J. Satter (1.4); participate in witness preparation call with A. Zimmerman (1.4); participate in witness preparation call with A. Currier (1.3).	6.20	$5,735.00
06/20/26	MRL	Finalize drafting the redirect examination questions for D. Martin.	0.40	$320.00
06/20/26	MRL	Continue drafting the direct examination questions of J. Satter.	1.50	$1,200.00
06/20/26	NMCG	Work on A. Zimmerman direct outline.	4.10	$3,382.50
06/21/26	AMUE	Prepare for cross-examination of Bishop Barber (4.5); prepare for witness testimony (RCC and RCWC) (1.6); review communications received from client leadership and respond to same regarding privileged matters concerning trial (1.0).	7.10	$8,697.50
06/21/26	DBG	Communications with A. Uetz regarding P. Shields (.2); communications with M. Lee regarding Bishop Barber's cross-examination (.3).	0.50	$725.00
06/21/26	ERR	Review identified insurance trial exhibits by Committee and insurers and prepare testimony outline regarding Bishop Barber (direct and cross-examination).	4.00	$5,000.00
06/21/26	JT	Prepare for hearing.	5.20	$2,392.00
06/21/26	MCM	Preparation for Day 3 of confirmation hearings, including cross-examination of Bishop Barber, direct and cross of D. Martin, and related argument.	3.50	$3,675.00
06/21/26	MDL	Prepare for Day Three of plan confirmation trial.	1.40	$1,400.00
06/21/26	MRL	Correspondence regarding preparations of the witness binder for D. Martin.	0.40	$320.00
06/21/26	MRL	Analyze transcripts regarding MAP (.5); correspondence with A. Uetz regarding the same (.2).	0.70	$560.00

06/21/26	MRL	Draft the cross-examination questions for R. Rosen.	0.90	$720.00
06/21/26	MRL	Draft the amended declaration for Verita.	0.80	$640.00
06/21/26	NMCG	Prepare for upcoming confirmation trial, including witness preparations and preparation of exhibits, analysis of Committee exhibits for upcoming witnesses, and strategizing with Foley team regarding other outstanding issues.	4.70	$3,877.50
06/21/26	SJM	Work on outline for J. Satter direct examination.	3.60	$3,330.00
06/21/26	SJM	Work on trial preparation.	2.60	$2,405.00
06/22/26	DBG	Assist with confirmation hearing issues.	8.30	$12,035.00
06/22/26	DBG	Analyze Committee/insurers' exhibits for Bishop Barber's cross (1.0); prepare A. Bardos' direct (3.0); communications with E. Ridley regarding A. Bardos' direct (.2).	4.20	$6,090.00
06/22/26	MCM	Prepare for cross-examinations of R. Rosen and K. McNally, potentially to take place on Friday, 6/26.	3.00	$3,150.00
06/22/26	MR	Summarize certain materials produced in discovery, in support of privileged strategy matters relating to chapter 11 plan confirmation proceedings.	0.70	$595.00
06/22/26	MRL	Draft a preparation outline for Verita testimony on confirmation hearing.	0.30	$240.00
06/22/26	MRL	Prepare for (.3) and meeting with A. Zimmerman and the Foley team to prepare for his testimony in the confirmation hearing (1.0).	1.30	$1,040.00
06/22/26	MRL	Assist with preparations for the third day of the confirmation hearing.	2.20	$1,760.00
06/22/26	MRL	Correspondence with the Foley team regarding the exhibits for the confirmation hearing.	0.40	$320.00
06/22/26	MRL	Correspondence with the Foley team regarding the witnesses for the confirmation hearing.	0.30	$240.00
06/22/26	MRL	Prepare for (.9) and meeting with J. Satter and the Foley team to prepare for his testimony in the confirmation hearing (1.0).	1.90	$1,520.00

06/22/26	MRL	Continue drafting the amended declaration for Verita.	0.30	$240.00
06/22/26	MRL	Call with the Committee regarding the witnesses for the confirmation hearing.	0.20	$160.00
06/22/26	NMCG	Prepare for trial, including further preparations of Bishop Barber and other strategies (2.2); correspond with Committee counsel and insurers' counsel regarding exhibits (.3).	2.50	$2,062.50
06/22/26	NMCG	Post-trial strategy with Foley team (1.0); witness preparations of Hilco witnesses (2.0); attention to outstanding issues regarding exhibits for Committee and Debtor (.5).	3.50	$2,887.50
06/22/26	SJM	Assist with trial preparation.	3.10	$2,867.50
06/22/26	SJM	Work on preparation for J. Satter testimony (2.7); work on preparation for A. Currier testimony (1.4).	4.10	$3,792.50
06/23/26	DBG	Continued preparation for A. Bardos' direct examination and topics for cross-examination (2.5); conference with R. Manns, counsel for RCC, RCWC, and Adventus, regarding A. Bardos' testimony (.3); communication with E. Ridley regarding preparation of A. Bardos (.1).	2.90	$4,205.00
06/23/26	ERR	Review materials in preparation for trial testimony of A. Bardos.	2.00	$2,500.00
06/23/26	MCM	Preparation for potential directed-verdict argument and related analysis (.6); work on cross-examination outlines for K. McNally and R. Rosen (1.4); work on amended voting summary for Class 3 claimants in connection with resolution of designation motion and stipulation (.6).	2.60	$2,730.00
06/23/26	MDL	Strategize with Foley team regarding direct examination of J. Satter, A. Zimmerman, and R. Gies and other evidentiary issues arising during the day.	2.80	$2,800.00
06/23/26	MRL	Continue drafting a preparation outline for Verita testimony on confirmation hearing.	0.60	$480.00

06/23/26	MRL	Confer with M. Moore regarding preparations for Verita's testimony (.4); analyze documents in preparation for the next day hearing (.9).	1.30	$1,040.00
06/23/26	MRL	Analyze binders for preparation of the hearing.	0.40	$320.00
06/23/26	MRL	Analyze LOIs for D. Flanagan's testimony preparation.	0.80	$640.00
06/23/26	MRL	Draft a summary of the hearing for the client.	1.50	$1,200.00
06/23/26	NMCG	Prepare for trial, including D. Flanagan witness prep and last-minute strategy with Foley team (1.5); correspond with Committee counsel and insurers' counsel regarding exhibits (.3).	1.80	$1,485.00
06/23/26	NMCG	Work on witness preparation for J. Hogan with S. Moses (3.6); work on exhibit management for upcoming witnesses and compiling e-binders and lists (2.0).	5.60	$4,620.00
06/23/26	SJM	Work on redirect outline for R. Gies.	1.60	$1,480.00
06/23/26	SJM	Assist with preparation for J. Hogan testimony (2.7); work on preparation for next day of trial (1.2).	3.90	$3,607.50
06/23/26	SJM	Meet with R. Manns, and R. Gies (for part) to prepare for trial testimony.	2.50	$2,312.50
06/24/26	ERR	Attend trial testimony preparation of A. Bardos.	4.50	$5,625.00
06/24/26	JCH	File notice of withdrawal of Bardos declaration in support of plan confirmation (.2); prepare notice of withdrawal of K. Martens declaration in support of plan confirmation (.2); file amended declaration regarding ballots and tabulation related to third amended plan (.2).	0.60	$252.00
06/24/26	MCM	Analysis of ballot-request issue for Class 4 ballots from Pacific Insurers (.5); continue working on preparation for cross of certain witnesses (1.0).	1.50	$1,575.00
06/24/26	MDL	Email correspondence with insurers' counsel regarding evidentiary stipulation on policies.	0.10	$100.00
06/24/26	MDL	Evaluate insurer stipulation on policy admissibility.	0.30	$300.00
06/24/26	MRL	Preparation meeting with D. Flanagan and Foley team regarding his testimony.	3.00	$2,400.00

06/24/26	MRL	Email correspondence with Verita regarding preparations for the hearing testimony.	0.30	$240.00
06/24/26	MRL	Continue drafting a preparation outline for Verita testimony on confirmation hearing.	0.60	$480.00
06/24/26	MRL	Prepare binders for the next day's hearing.	0.60	$480.00
06/24/26	MRL	Email correspondence with the Foley team regarding the confirmation hearing.	0.30	$240.00
06/24/26	NMCG	Witness preparations for A. Bardos and D. Flanagan (4.5); attention to other exhibit management for witness binders (.8); witness preparation for J. Hogan (1.5).	6.80	$5,610.00
06/24/26	NMCG	Post-trial work, including preparing exhibits for upcoming day and working on further A. Bardos preparations.	1.50	$1,237.50
06/24/26	SJM	Finalize notice of withdrawal of Bardos declaration.	0.20	$185.00
06/24/26	SJM	Assist with preparation for trial.	1.10	$1,017.50
06/24/26	SJM	Participate (for part) in witness preparation meetings with D. Flanagan and A. Bardos.	3.60	$3,330.00
06/24/26	SJM	Work on preparation for final day of Debtor case at trial.	1.70	$1,572.50
06/24/26	WD	Follow up with attorney service regarding delivery of chambers copies for motion for new trial.	0.10	$48.00
06/25/26	DBG	Prepare for A. Bardos testimony (2.5); meet with A. Bardos, A. Uetz, and D. Flanagan regarding testimony (1.3).	3.80	$5,510.00
06/25/26	MR	Analyze documents produced in discovery, in furtherance of privileged strategy matters relating to witness examination during plan confirmation hearing.	0.80	$680.00
06/25/26	MRL	Draft a summary of the hearing for the client (1.0); analyze documents in preparation for the hearing (1.0).	2.00	$1,600.00

06/25/26	NMCG	Prepare for trial, including additional witness preparations for A. Bardos and other general strategy with Foley team (1.5); correspond with Committee counsel and insurer counsel regarding exhibits (.3).	1.80	$1,485.00
06/25/26	SJM	Work on preparation for response to anticipated Committee motion for directed verdict.	5.30	$4,902.50
06/26/26	AMUE	Debrief from trial and draft privileged memorandum to client regarding same (2.5); review transcripts to analyze privileged issue relating to trial (2.0); analyze exhibits relating to privileged issue (1.5).	6.00	$7,350.00
06/26/26	DBG	Prepare for P. Shields testimony (5.0); address evidentiary question of A. Uetz (.4).	5.40	$7,830.00
06/26/26	JT	Preparation of admitted exhibits binders.	7.20	$3,312.00
06/26/26	MRL	Email correspondence with M. Moore regarding preparation for R. Rosen's testimony.	0.20	$160.00
06/26/26	MRL	Draft a summary of the hearing for the client.	1.90	$1,520.00
06/26/26	MRL	Email correspondence with the Foley team regarding exhibit binders for the hearing.	0.30	$240.00
06/26/26	NMCG	Discuss confirmation trial strategy with Foley team (.5); analyze prior deposition designations by Debtor (.8); correspondence with Foley team regarding the same (.5).	1.80	$1,485.00
06/26/26	SJM	Analyze evidence regarding issues raised by Committee in motion for directed verdict.	1.10	$1,017.50
06/27/26	DBG	Prepare trial examination of P. Shields (4.8); communications with N. McGuffey regarding Shields binder and trial exhibits (.3); team communications led by A. Uetz regarding trial strategy and next steps (.4).	5.50	$7,975.00
06/27/26	JT	Preparation of admitted exhibits binders.	7.70	$3,542.00
06/27/26	MCM	Prepare for confirmation hearing day 7, including cross-examination of K. McNally and R. Rosen.	3.00	$3,150.00
06/27/26	MDL	Strategize with Foley team regarding post-trial briefing on feasibility and fair-and-equitable issues.	0.80	$800.00

06/27/26	SJM	Review proposed order on sealing of expert reports.	0.20	$185.00
06/27/26	SJM	Respond to emails regarding strategy for post-trial briefing.	0.40	$370.00
06/28/26	AMUE	Meeting with M. Moore and D. Goroff regarding trial strategy.	1.00	$1,225.00
06/28/26	AMUE	Prepare for trial.	2.50	$3,062.50
06/28/26	DBG	Continued preparation for P. Shields cross (4.0); meet with A. Uetz and M. Moore regarding trial strategy (1.4).	5.40	$7,830.00
06/28/26	JT	Continue preparation of admitted exhibits binders (4.8); annotate hearing transcripts regarding cemeteries (4.2); update exhibit tracker (1.4); prepare for hearing (1.2).	11.60	$5,336.00
06/28/26	MCM	Prepare for final witness examinations/cross-examinations in RCBO confirmation hearings.	4.70	$4,935.00
06/28/26	MR	Summarize certain documents produced in discovery, in furtherance of witness preparation for testimony at plan confirmation hearing.	1.40	$1,190.00
06/28/26	MRL	Email correspondence with the Foley team regarding preparations for the confirmation hearing.	0.40	$320.00
06/28/26	MRL	Analyze certain testimony of A. Zimmerman to answer Foley team's questions.	1.30	$1,040.00
06/28/26	MRL	Confer with N. McGuffey regarding research assignment.	0.20	$160.00
06/28/26	MRL	Research issues regarding expert testifying on cross-examination.	0.80	$640.00
06/28/26	MRL	Analyze filings regarding deposition designations.	0.40	$320.00
06/28/26	MRL	Revise the Rosen outline for the cross-examination.	2.50	$2,000.00
06/28/26	MRL	Analyze exhibit binders for R. Rosen and K. McNally testimonies.	1.50	$1,200.00
06/28/26	MRL	Revise the McNally outline for the cross-examination.	1.80	$1,440.00

06/28/26	NMCG	Prepare for trial, including preparation for P. Shields cross (1.1); correspond with Foley team regarding various exhibits (.7); research case law in support of cross testimony (2.7); review trial transcripts regarding strategy of confirmation trial (4.1); strategize the same with Foley team (1.3); analyze Committee amended exhibits in preparation for P. Shields testimony (.6).	10.50	$8,662.50
06/28/26	SJM	Prepare response to insurer late deposition designations (.6); email to insurers regarding same (.2).	0.80	$740.00
06/28/26	SJM	Attention to Committee exhibits for Committee expert witnesses.	1.00	$925.00
06/29/26	JCH	Prepare draft objection to Pacific Insurers' counter-designation of D. Flanagan deposition (.5); file objection (.2).	0.70	$294.00
06/29/26	MCM	Debrief with client parties following trial day 7 (.5); follow-up at office with Foley team (1.0).	1.50	$1,575.00
06/29/26	MDL	Strategize with Foley team regarding cemetery valuation questions and possible rebuttal evidence concerning same.	0.90	$900.00
06/29/26	MRL	Email correspondence with D. Goroff regarding the Shields testimony.	0.30	$240.00
06/29/26	MRL	Analyze documents in preparation for the hearing.	1.30	$1,040.00
06/29/26	MRL	Analyze testimony binders after the hearing.	0.50	$400.00
06/29/26	NMCG	Post-confirmation trial work and strategy (.5); manage admitted exhibits after closing of trial (.3); correspond with J. Torres regarding the same (.2).	1.00	$825.00
06/29/26	NMCG	Preparations for trial, including preparing for P. Shields cross-examination (1.3); correspond with Committee and insurer counsel regarding witness exhibits (.2).	1.50	$1,237.50
06/29/26	SJM	Attention to issues regarding trial exhibits.	0.60	$555.00
06/30/26	JT	Continue preparation of admitted exhibits binders.	4.40	$2,024.00
06/30/26	MRL	Confer with S. Moses regarding abuse claims in certain parishes.	0.20	$160.00

06/30/26	MRL	Analyze documents regarding abuse claims in certain parishes.	0.40	$320.00
06/30/26	MRL	Draft a summary of the hearing for the client.	0.40	$320.00
06/30/26	MRL	Email correspondence with the Foley team regarding the exhibits for the confirmation hearing.	0.20	$160.00
06/30/26	SJM	Finalize notice regarding judicial notice of insurance coverage litigation complaint.	0.40	$370.00
06/30/26	SJM	Follow up with parties regarding court preferences for exhibit binders.	0.20	$185.00
		Task Total:	1,120.00	$1,101,384.50

008 Communications with Client

06/04/26	MDL	Email exchange with M. Kemner regarding possible resolution with CIGA.	0.10	$100.00
06/05/26	AMUE	Communications with M. Kemner regarding privileged issue relating to plan confirmation.	0.80	$980.00
06/08/26	SJM	Email to A. Bardos regarding real property stipulation and supplemental discovery responses.	0.70	$647.50
06/09/26	AMUE	Multiple communications with M. Kemner and Bishop Barber regarding privileged matter relating to trial, including drafting detailed communication to Bishop Barber relating to same.	2.00	$2,450.00
06/09/26	MDL	Meet with A. Bardos to discuss evidentiary stipulations with Committee and preparation for trial testimony,.	1.10	$1,100.00
06/09/26	MRL	Call with the client and Foley teams to discuss the responses to the Committee's discovery requests.	0.60	$480.00
06/10/26	AMUE	Communications with Bishop Barber regarding privileged issue relating to trial.	0.40	$490.00
06/16/26	MDL	Email exchange with A. Bardos regarding communication with priests about restructuring developments.	0.20	$200.00
06/18/26	AMUE	Meeting with A. Bardos and M. Lee regarding trial witnesses.	0.50	$612.50

06/18/26	MDL	Meeting with A. Bardos and D. Flanagan regarding trial preparations and their testimony.	0.50	$500.00
06/18/26	MDL	Email exchange with client leadership regarding K. Martens' testimony.	0.30	$300.00
06/18/26	SJM	Attend call with client leadership to report and advise on privileged matters.	1.60	$1,480.00
06/19/26	MDL	Email exchange with A. Bardos and M. Kemner regarding communication with priests about restructuring issues.	0.30	$300.00
06/19/26	MDL	Email exchange with M. Kemner regarding CIGA settlement discussions.	0.20	$200.00
06/28/26	AMUE	Review multiple communications received from leadership and respond to same.	1.50	$1,837.50
06/30/26	SJM	Review issue regarding claims in response to request from client.	0.50	$462.50
		Task Total:	11.30	$12,140.00

011 Cash Management

06/26/26	SJM	Respond to client regarding cash management issues related to Cathedral.	0.30	$277.50
		Task Total:	0.30	$277.50

012 Disclosure Statement

06/01/26	MCM	Work on issues in connection with designation motion filed by Committee.	1.00	$1,050.00
06/04/26	MCM	Attention to issues concerning Committee RFPs and 2025 voting results on third amended plan/disclosure statement (.5); email correspondence with Verita regarding incremental voting update and review of same (.5).	1.00	$1,050.00
06/08/26	MCM	Work on issues in connection with voting for Classes 3, 4, and 5 and Committee's designation motion in connection with Class 3.	2.30	$2,415.00

06/09/26	MCM	Analysis of latest voting results prior to deadline on June 10 and memorandum to file regarding same.	1.50	$1,575.00
06/10/26	MCM	Attention to voting issues on final day and reconciliation of final votes received by Verita (1.5); email correspondence regarding same (.4).	1.90	$1,995.00
06/11/26	MCM	Meeting with Verita to organize supplemental voting declarations and to address designation issues with Committee (1.0); work with Committee on stipulation to address voting issues and designation motion (1.4).	2.40	$2,520.00
06/11/26	MRL	Call with Verita and Foley teams regarding the votes on the plan (partial).	0.30	$240.00
06/14/26	MWBE	(No Charge) Follow up with team regarding potential estoppel regarding trust issue.	0.10	$0.00
		Task Total:	10.50	$10,845.00

016 General Case Strategy (includes team calls)

06/01/26	MRL	Confer with N. McGuffey regarding the Committee's letter to the survivors.	0.10	$80.00
06/01/26	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to client.	0.40	$320.00
06/06/26	MCM	Internal Foley emails and telephone conferences regarding case issues.	0.90	$945.00
06/10/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.80	$640.00
06/10/26	MRL	Confer with N. McGuffey regarding the outstanding tasks in the case.	0.30	$240.00
06/11/26	MRL	Email correspondence with A. Uetz regarding the weekly email update to the client.	0.20	$160.00
06/11/26	NMCG	Various correspondences with Foley team regarding upcoming deadlines in connection with confirmation trial.	0.60	$495.00
06/12/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	1.30	$1,040.00

06/12/26	MRL	Confer with N. McGuffey regarding revisions to the exhibit list.	0.10	$80.00
06/13/26	AMUE	Communications with team relating to trial preparation.	1.20	$1,470.00
06/14/26	MRL	Confer with the Foley team regarding preparations for the confirmation hearing.	0.80	$640.00
06/14/26	NMCG	Strategize regarding upcoming confirmation trial with Foley team regarding witness preparations, exhibits, and other outstanding issues.	4.20	$3,465.00
06/18/26	MDL	Strategize with Foley team regarding property valuation issues.	0.10	$100.00
06/26/26	MCM	Email correspondence with Foley team regarding case issues (.4); analysis of outstanding matters before day 7 of confirmation hearing (.3).	0.70	$735.00
		Task Total:	11.70	$10,410.00

017 Hearings and Court Matters

06/03/26	SJM	Prepare for hearing on DIP motion (1.1); attend hearing (1.3).	2.40	$2,220.00
06/08/26	AMUE	Prepare for (1.8) and appearance at (3.2) final pretrial conference.	5.00	$6,125.00
06/08/26	DBG	Prepare oral argument regarding motion to strike Pacific Insurers' objection (.4); appear in court for hearing and oral arguments (3.1).	3.50	$5,075.00
06/08/26	ERR	Prepare for (1.8) and attend (3.2) pretrial conference regarding trial on plan confirmation.	5.00	$6,250.00
06/08/26	MDL	Attend remotely, but not appear at, pretrial hearing on behalf of Debtor (partial).	1.60	$1,600.00
06/08/26	SJM	Attend pretrial hearing.	3.20	$2,960.00
06/11/26	SJM	Attend trial technology test with court staff for confirmation trial.	0.90	$832.50
06/12/26	AMUE	Help team prepare for hearing on pretrial motions and related matters (1.2) and attend hearing (4.8).	6.00	$7,350.00

06/12/26	DBG	Prepare for (3.4) and argue (4.6) motions in limine regarding limiting insurers' role, limiting reference to circumstances of abuse, limiting reference to informed consent of survivors and Shields Daubert motion; continue drafting opening statement (1.5).	9.50	$13,775.00
06/12/26	MCM	Prepare for (1.5) and participate in (4.5) hearing on motions to exclude, motions in limine, and remaining pretrial matters in Oakland, California.	6.00	$6,300.00
06/12/26	MDL	Attend (but not appear at) hearing on motions in limine and strategize with Foley team regarding arguments made at same (partial).	4.10	$4,100.00
06/12/26	MRL	Listen to a portion of the hearing on the discovery motions to take notes for the Foley team.	1.50	$1,200.00
06/12/26	NMCG	Attend remotely the hearing on the motions in limine and other discovery motions and take notes (partial).	3.30	$2,722.50
06/12/26	SJM	Attend hearing on motions in limine.	4.80	$4,440.00
06/15/26	AMUE	Attend confirmation trial (8.0); prepare for next day (4.0). [16.0 hours worked/bill for 12.0 hours].	12.00	$14,700.00
06/15/26	DBG	Attend first day of trial and deliver opening statement, and examine C. Moore as witness (8.0); prepare for same (1.0).	9.00	$13,050.00
06/15/26	JT	Attend hearing (8.1); preparation of exhibits for Bishop Barber's testimony (1.7); log exhibits admitted at hearing (.5); further hearing preparation (1.7).	12.00	$5,520.00
06/15/26	MCM	Prepare for (2.0) and participate in (8.0) Trial Day 1 in confirmation hearings for the Roman Catholic Bishop of Oakland; prepare for Trial Day 2 with Foley team in San Francisco (2.5).	12.50	$13,125.00
06/15/26	MDL	Appear for Debtor at first day of plan confirmation trial.	8.10	$8,100.00
06/15/26	MRL	Participate in the first day of the confirmation hearing (8.0); prepare for hearing (2.5).	10.50	$8,400.00
06/15/26	NMCG	Attend and participate in trial, including assisting with C. Moore direct and other preparations for witnesses and exhibits.	8.00	$6,600.00

06/15/26	SJM	Attend trial on plan confirmation (8.0); prepare for same (1.5).	9.50	$8,787.50
06/16/26	AMUE	Participate in trial (9.3); prepare for same (2.7). [18.0 hours worked/bill for 12.0 hours].	12.00	$14,700.00
06/16/26	DBG	Continued preparation for C. Moore redirect (1.5); conduct C. Moore redirect and assist with trial (9.5).	11.00	$15,950.00
06/16/26	ERR	Attend (remotely) trial regarding plan (partial).	3.00	$3,750.00
06/16/26	JT	Attend trial (9.5); prepare materials (2.3).	11.80	$5,428.00
06/16/26	MCM	Participate in Trial Day 2 in confirmation hearings in Roman Catholic Bishop of Oakland bankruptcy case (9.0); debrief with client parties following same (1.0).	10.00	$10,500.00
06/16/26	MDL	Appear at confirmation trial for RCBO (partial).	6.70	$6,700.00
06/16/26	MRL	Attend and participate in the second day of the confirmation hearing (9.5); prepare for same (.5).	10.00	$8,000.00
06/16/26	NMCG	Attend and participate in trial, including assisting with Bishop Barber's direct, C. Moore's redirect, and other preparations for witnesses and exhibits (partial).	8.30	$6,847.50
06/16/26	SJM	Attend trial on plan confirmation.	9.20	$8,510.00
06/22/26	AMUE	Prepare for (2.3), attend (8.5), and debrief from (1.2), contested confirmation trial. [16.0 hours worked/bill for 12.0 hours].	12.00	$14,700.00
06/22/26	ERR	Attend trial of plan confirmation in bankruptcy court including preparation of Bishop Barber for testimony.	8.50	$10,625.00
06/22/26	JT	Prepare to attend hearing (2.2); attend hearing (8.5).	10.70	$4,922.00
06/22/26	MCM	Attend Day 3 of confirmation hearings in RCBO bankruptcy case (partial).	7.00	$7,350.00
06/22/26	MDL	Appear for Debtor at Day Three of plan confirmation trial (partial).	6.20	$6,200.00
06/22/26	MDL	Prepare for Day Three of plan confirmation trial.	2.30	$2,300.00

06/22/26	MDL	Strategize with Foley team and expert witnesses following Day Three and in advance of Day Four of plan confirmation trial.	4.10	$4,100.00
06/22/26	MRL	Participate in the third day of the confirmation hearing (partial).	6.40	$5,120.00
06/22/26	NMCG	Participate in trial, including preparing witnesses and attend to other trial issues.	8.00	$6,600.00
06/22/26	SJM	Attend trial on plan confirmation (partial).	5.40	$4,995.00
06/23/26	AMUE	Prepare for (2.0) and attend (7.0) trial; prepare for next day of trial (3.0). [16.0 hours worked/bill for 12.0 hours].	12.00	$14,700.00
06/23/26	DBG	Assist at confirmation hearing.	8.00	$11,600.00
06/23/26	JT	Preparation for hearing (4.3); attend hearing (7.5).	11.80	$5,428.00
06/23/26	MCM	Attend Day 4 of confirmation hearings in RCBO bankruptcy case.	7.00	$7,350.00
06/23/26	MDL	Remote attendance at Day Four of RCBO plan confirmation trial.	4.60	$4,600.00
06/23/26	MRL	Participate in the fourth day of the confirmation hearing (partial) (4.5); prepare for same (3.0).	7.50	$6,000.00
06/23/26	NMCG	Attend and participate in trial, including exhibit management and working on upcoming witness preparations for D. Flanagan, J. Hogan, and A. Bardos.	8.00	$6,600.00
06/23/26	SJM	Attend trial (partial).	4.50	$4,162.50
06/24/26	AMUE	Prepare for (2.0) and attend (3.5) trial; prepare for next day of trial (6.5). [16.0 hours worked/bill for 12.0 hours].	12.00	$14,700.00
06/24/26	DBG	Prepare A. Bardos for testimony (5.0); assist with trial (3.5).	8.50	$12,325.00
06/24/26	JT	Preparation for hearing (7.3); attend hearing (3.4).	10.70	$4,922.00
06/24/26	MCM	Prepare for (.5) and remote attendance at (3.5) day 5 of RCBO confirmation trial, including telephone conferences with trial team and client parties.	4.00	$4,200.00
06/24/26	MRL	Participate in the fifth day of the confirmation hearing (3.5); prepare for same (1.4).	4.90	$3,920.00

06/24/26	NMCG	Participate in trial, including putting up witness J. Hogan and assisting with other witnesses.	3.50	$2,887.50
06/24/26	SJM	Attend confirmation trial.	3.50	$3,237.50
06/25/26	AMUE	Prepare for (2.5) and appear at (7.5) trial; debrief from trial to prepare for next week (2.7).	12.70	$15,557.50
06/25/26	DBG	Present A. Bardos as witness at trial and assist with related arguments.	7.50	$10,875.00
06/25/26	JT	Preparation for hearing (2.5); attend hearing (7.1).	9.60	$4,416.00
06/25/26	MCM	Partial remote participation in day 6 of RCBO confirmation hearings, including discussion with Foley team regarding legal analysis and preparation for individual witnesses.	6.00	$6,300.00
06/25/26	MRL	Participate in the sixth day of the confirmation hearing.	7.40	$5,920.00
06/25/26	NMCG	Participate in trial, including assisting with opposition to Committee's directed verdict motion, exhibit management, conferring with Committee counsel regarding exhibits and other issues (7.5); prepare for same (.5).	8.00	$6,600.00
06/25/26	SJM	Attend (for part) day six of trial.	4.10	$3,792.50
06/29/26	AMUE	Prepare for trial (2.5); appearance at trial (7.5); debrief from same (1.0).	11.00	$13,475.00
06/29/26	DBG	Prepare for P. Shields exam (3.0); participate in trial (partial) (6.5).	9.50	$13,775.00
06/29/26	JT	Prepare to attend hearing (3.4); attend hearing (7.4).	10.80	$4,968.00
06/29/26	MCM	Participate in RCBO confirmation trial day 7, including cross-examination of R. Rosen and K. McNally (partial).	6.50	$6,825.00
06/29/26	MRL	Participate in the seventh day of the confirmation hearing.	7.40	$5,920.00
06/29/26	NMCG	Participate in trial, including assisting with formulation of trial strategy and P. Shields cross-examination.	7.40	$6,105.00
06/29/26	SJM	Attend trial on plan confirmation.	7.20	$6,660.00

06/30/26	SJM	Call with court regarding exhibit binders and final exhibit list (.2); confer with J. Torres regarding same (.6).	0.80	$740.00
		Task Total:	517.40	$509,091.50

018 Non-Bankruptcy Litigation

06/01/26	AROU	Analyze JCCP 5108 cases involving other alleged perpetrators in preparation of submission to the court for potential bellwether trial setting.	0.60	$600.00
06/01/26	TFCA	Attention to insurers' motion to intervene in state cases regarding case selection.	0.50	$762.50
06/02/26	AROU	Analyze JCCP 5108 cases involving other alleged perpetrators in preparation of submission to the court for potential bellwether trial setting.	1.80	$1,800.00
06/02/26	KAFA	Prepare facts for plaintiffs in certain coverage cases (1.1); summarize John Doe OK 1141 plaintiff and alleged perpetrator facts for A. Ouellette (.5).	1.60	$768.00
06/02/26	TFCA	Begin review of insurance coverage for selection (.5); work on protective order (.3); review emails from K. Farrar and M. Roberts regarding spreadsheet and fact sheet (.5).	1.30	$1,982.50
06/03/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	1.10	$1,100.00
06/03/26	AROU	Draft court-ordered case summaries and proffer for defendant's proposed accused party cases for bellwether trial setting.	1.10	$1,100.00
06/03/26	AROU	Analyze JCCP 5108 cases involving other alleged perpetrators in preparation of submission to the court for potential bellwether trial setting.	3.40	$3,400.00
06/03/26	TFCA	Telephone call with R. Simons (.3); meet with A. Ouellette regarding case selection and prep regarding same (.3); begin review of cases (.5).	1.10	$1,677.50
06/04/26	AROU	Analyze JCCP 5108 cases involving other alleged perpetrators in preparation of submission to the court for potential bellwether trial setting.	3.80	$3,800.00

06/04/26	AROU	Draft summary of proposed cases for bellwether trial setting.	1.40	$1,400.00
06/04/26	AROU	Team conference to strategize regarding selection of potential bellwether cases for trial setting.	0.80	$800.00
06/04/26	KAFA	Strategize with team to discuss bellwether case selection (.8); evaluate facts of additional cases to proffer to Judge Chatterjee for bellwether trials (1.8); prepare facts for trial team of plaintiff's being considered for potential bellwether cases (1.3); confer with A. Ouellette to discuss final 5 recommended bellwether cases (.4).	4.30	$2,064.00
06/04/26	MR	Attend strategy call with T. Carlucci, J. Blease, E. Ridley, A. Ouellette and K. Farrar regarding privileged matters in relation to litigation of underlying state court cases.	0.70	$595.00
06/04/26	TFCA	Continue review of materials to prepare for call regarding case selection (1.3); attend call regarding same (.6); review follow-up info to finalize the list (.6); emails with E. Ridley regarding same regarding insurers (.2).	2.70	$4,117.50
06/05/26	TFCA	Review email to insurers regarding case selection.	0.20	$305.00
06/06/26	TFCA	Telephone call with R. Simons regarding litigation (.7); telephone call with J. Blease regarding same (.3).	1.00	$1,525.00
06/07/26	TFCA	Emails with A. Ouellette regarding drafting paragraphs for case submissions to court.	0.20	$305.00
06/08/26	AROU	Strategize regarding proofs of claim and fact sheets and draft RCBO's portion of submission regarding bellwether cases for trial setting.	3.10	$3,100.00
06/08/26	KAFA	Assist with preparation of summaries for the five proposed bellwether cases.	0.40	$192.00
06/08/26	TFCA	Meet with M. Moore and discuss litigation strategy (.5); meet with M. Lee to discuss settlement strategy (.5); email R. Simons regarding RCBO’s case selection (.2).	1.20	$1,830.00
06/09/26	AROU	Respond to correspondence from Z. Rutman regarding suspending deadlines in cases currently set for trial as bellwethers.	0.10	$100.00

06/09/26	AROU	Analyze plaintiff's proposed bellwether cases for trial setting and strategize regarding the same.	2.40	$2,400.00
06/09/26	KAFA	Prepare information related to 5 cases proffered by R. Simons for trial for team review (.6); analysis of John Doe X.X.'s amendment to complaint, application for order approving plaintiff's certificate of merit and application for in camera finding of reasonable and meritorious case for filing of action (.3).	0.90	$432.00
06/09/26	MR	Perform privileged analysis in relation to setting of additional state court trials by Judge Chatterjee.	0.70	$595.00
06/09/26	TFCA	Meet with M. Moore regarding litigation issue (.3); meet with M. Lee regarding strategy regarding plan language (.5); review plaintiff's case selection and send to M. Moore (.3); emails regarding sealing issue (.2); discuss plaintiff's submission with E. Ridley regarding insurance coverage (.2).	1.50	$2,287.50
06/10/26	AROU	Correspond with plaintiffs' counsel and Department 21 regarding proposed cases for trial setting.	0.50	$500.00
06/10/26	AROU	Correspond with liaison counsel for the institutional defendants regarding proposed cases for trial setting.	0.10	$100.00
06/10/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	1.10	$1,100.00
06/10/26	AROU	Draft joint proposed case selection for trial setting.	3.80	$3,800.00
06/10/26	SJM	Follow up regarding inquiry from co-defendant in state court matter.	0.40	$370.00
06/10/26	TFCA	Emails regarding case management conference date and time issue.	0.20	$305.00
06/11/26	AROU	Draft confidential and redacted versions of submission regarding case selection and correspond with R. Simons regarding the same.	1.20	$1,200.00
06/11/26	TFCA	Review emails regarding sealing order and edit case management statement case selection filing (.6); review emails with insurers regarding same (.2).	0.80	$1,220.00

06/12/26	AROU	Coordination call with D. Zamora, counsel for institutional defendants in JCCP 5108.	0.60	$600.00
06/12/26	KAFA	Analysis of RCBO's proposed trial cases filing from CaseAnywhere (.2); analysis of news article regarding L.A. County D.A. claims (.2).	0.40	$192.00
06/12/26	TFCA	Review detailed update email regarding schedule.	0.30	$457.50
06/13/26	TFCA	Strategize with M. Lee regarding strategy.	0.20	$305.00
06/17/26	TFCA	Review case management statement and provide edits.	0.30	$457.50
06/22/26	AROU	Strategize regarding JCCP 5108 case management conference.	0.40	$400.00
06/22/26	TFCA	Telephone call with R. Simons (.2); meet with bankruptcy team regarding update on trial (.5); confer with M. Lee regarding same (.3); emails regarding court schedule change regarding insurers' motion and 5108 CMC and discuss same with A. Ouellette (.3).	1.30	$1,982.50
06/23/26	AROU	Prepare for JCCP 5108 case management conference specific to RCBO.	1.00	$1,000.00
06/23/26	AROU	Prepare for hearing on insurers' motion to intervene and objection to setting of replacement cases for trial.	1.70	$1,700.00
06/23/26	TFCA	Emails with A. Ouellette regarding insurers' motion.	0.20	$305.00
06/24/26	AROU	Draft comprehensive report analyzing JCCP 5108 case management conference specific to cases pending against RCBO and trial setting of five cases.	2.60	$2,600.00
06/24/26	AROU	Prepare for JCCP 5108 case management conference specific to RCBO.	0.50	$500.00
06/24/26	AROU	Attend JCCP 5108 case management conference specific to cases pending against RCBO (3.0); prepare for same (.5).	3.50	$3,500.00
06/24/26	AROU	Strategize regarding next steps following JCCP 5108 case management conference specific to cases pending against RCBO and trial setting of five cases.	1.10	$1,100.00

06/24/26	TFCA	Attend court hearing regarding case selection (3.0); post-court meeting with A. Ouellette (.3); review draft write-up regarding same (.2); emails with E. Ridley regarding insurers' position regarding counsel controlling litigation (.4).	3.90	$5,947.50
06/25/26	AROU	Draft court-ordered proposed order following case management conference.	2.60	$2,600.00
06/25/26	KAFA	Prepare summary of the next 5 cases set for trial for A. Ouellette (.5); meeting with A. Ouellette regarding next steps to prepare for next 5 state court trials (.5); strategize regarding next 5 cases set for trial (.5).	1.50	$720.00
06/25/26	TFCA	Review draft order.	0.30	$457.50
06/26/26	AROU	Revise draft proposed order following case management conference.	0.80	$800.00
06/26/26	AROU	Correspond with plaintiffs' liaison counsel regarding proposed order following case management conference.	0.10	$100.00
06/26/26	KAFA	Prepare summary spreadsheet of cases going to trial (.8); begin to compile case documents for 5 cases going to trial (3.3).	4.10	$1,968.00
06/26/26	TFCA	Attention to court reporting follow-up (.2); review proposed case management conference follow-up regarding insurers (.2).	0.40	$610.00
06/27/26	TFCA	Review list of trials and dates and emails with A. Ouellette regarding same.	0.50	$762.50
06/28/26	TFCA	Telephone call with J. Blease.	0.50	$762.50
06/29/26	KAFA	Continue to compile case documents for 5 cases going to trial.	1.00	$480.00
06/29/26	TFCA	Review materials to prep for meeting regarding trial assignment (.5); attend meeting with team to go over task list and strategy and follow up (2.0); review San Francisco settlement (.3); review update emails from A. Uetz (.2).	3.00	$4,575.00
06/30/26	AROU	Further revisions to proposed order setting new cases for trial.	0.50	$500.00

06/30/26	TFCA	Review numerous emails regarding insurance letter regarding drop-down coverage (.5); finalize CMC order and emails regarding same (.2); email with R. Simons (.2).	0.90	$1,372.50
		Task Total:	80.20	$84,388.50

019 Non-Working Travel

06/02/26	DBG	Travel to New York for M. Babcock's second deposition.	3.50	$2,537.50
06/03/26	DBG	Return travel from New York to Chicago.	4.50	$3,262.50
		Task Total:	8.00	$5,800.00

020 Retention/Billing/Fee Applications for Debtor Professionals

06/01/26	TND	Correspondence with Debtor professionals regarding upcoming interim fee applications.	0.40	$352.00
06/04/26	JCH	Revisions to Foley's ninth interim fee application to add fees and expenses.	2.00	$840.00
06/05/26	JCH	Finalize revisions to Foley ninth interim fee application to add fees and expenses.	1.00	$420.00
06/08/26	TND	Email to I. Velikova on timing of fee hearing (.1); gather information needed for Foley's ninth interim fee application (.5).	0.60	$528.00
06/09/26	TND	Further preparation of ninth interim fee application.	2.30	$2,024.00
06/10/26	TND	Further preparation of ninth interim fee application.	2.10	$1,848.00
06/11/26	TND	Further preparation of Foley's ninth interim fee application (1.1); email and telephone call with J. Torres on billing practices for bankruptcy entries (.3).	1.40	$1,232.00
06/12/26	JCH	Prepare draft certificates of no objection to Foley, A&M and NERA April 2026 fee statements.	0.50	$210.00
06/12/26	TND	Further drafting of ninth interim fee application (3.6); analyze billing information for same (.2); email to L. Krucks on Hilco application (.1).	3.90	$3,432.00

06/15/26	TND	Emails to Debtor's professionals with updated information on filing interim fee applications.	0.20	$176.00
06/16/26	TND	Provide suggested revisions to I. Velikova on NERA application (.3); provide suggested updates to N. Corbett on A&M fee application (.3); email follow-up to L. Krucks on Hilco application (.1); email to J. Breall on application filing (.1).	0.80	$704.00
06/17/26	SJM	Work on background section of narrative for Foley interim fee application.	2.40	$2,220.00
06/17/26	TND	Email with J. Harrison on Foley interim fee app.	0.10	$88.00
06/18/26	JCH	Finalize interim fee applications of Foley, A&M, NERA, Hilco, Judge Sontchi, T. Gallagher and Judge Newsome (1.2); file interim fee applications (.5); prepare notice of hearing on interim fee applications (.8); file notice of hearing on interim fee applications (.2).	2.70	$1,134.00
06/18/26	MDL	Strategize for Debtor's objection to Committee interim fee applications.	0.30	$300.00
06/18/26	MDL	Draft insert to exhibit of interim fee application.	0.40	$400.00
06/18/26	SJM	Finish drafting Foley fee application background section.	1.20	$1,110.00
06/18/26	TND	Finalize Foley ninth interim fee application (2.4); finalize A&M ninth interim fee application (.3); finalize NERA interim fee application (.3); finalize Hilco interim fee application (.2); discussions with Foley team on ninth interim fee application (.3); discussions with Debtor professionals on filing and service (.4).	3.90	$3,432.00
06/22/26	TND	Prepare information for Foley May 2026 fee statement to ensure compliance with U.S. Trustee guidelines.	3.10	$2,728.00
06/23/26	TND	Further preparation of information for May monthly fee statement to ensure compliance with U.S. Trustee guidelines.	1.20	$1,056.00
06/24/26	TND	Review questions on May fee statement.	0.20	$176.00
06/25/26	TND	Further preparation of May 2026 fee statement to ensure compliance with U.S. Trustee Guidelines.	2.30	$2,024.00

06/26/26	TND	Email correspondence with A. Uetz regarding May invoice.	0.30	$264.00
06/29/26	JCH	Prepare draft of Foley monthly fee statement for May 2026.	0.50	$210.00
06/29/26	TND	Work on additional billing task codes for additional matters going to trial.	0.30	$264.00
06/30/26	JCH	Revise NERA May 2026 monthly fee statement to conform with local guidelines (.2); finalize Foley May 2026 monthly fee statement (.5); file Foley and NERA May 2026 monthly fee statements (.2).	0.90	$378.00
06/30/26	TND	Finalize Foley fee application for May (.8); finalize NERA application (.3).	1.10	$968.00
		Task Total:	36.10	$28,518.00

022 Retention/Fee Applications: Other Professionals

06/01/26	SJM	Confer with T. Dolcourt regarding coordination with professionals on interim fee applications.	0.20	$185.00
06/01/26	TND	Email correspondence with S. Moses and A. Fernandez on upcoming interim fee applications.	0.20	$176.00
06/04/26	JCH	Prepare chart of interim payments due to all case professionals for April 2026 monthly fee statements and email same to S. Moses.	0.50	$210.00
06/04/26	SJM	Email to client regarding filed monthly fee statements.	0.60	$555.00
06/06/26	SJM	Emails with Committee counsel and fee examiner regarding timing for interim fee applications.	0.40	$370.00
06/09/26	SJM	Email correspondence with Committee counsel regarding timing for interim fee applications.	0.20	$185.00
06/15/26	TND	Emails to mediators with updated information on filing interim fee applications.	0.20	$176.00
06/16/26	TND	Provide suggested revisions to C. Syzmanski for Judge Sontchi's fee application.	0.20	$176.00

06/18/26	TND	Finalize fee applications for Mediators Newsome, Gallagher, and Sontchi (.8); communications with Judge Newsome regarding same (.1); communications with C. Syzmanski regarding same (.1); email to A. Fernandez regarding same (.1).	1.10	$968.00
06/19/26	NCW	Call with N. McGuffey regarding issues related to fee applications.	0.20	$130.00
06/23/26	NCW	Research regarding issues related to fee application objections.	4.10	$2,665.00
06/26/26	SJM	Email to client regarding payment of April monthly statements.	0.60	$555.00
06/29/26	TND	Review payments to be issued for prior monthly fee statements.	0.10	$88.00
06/30/26	JCH	Prepare chart listing interim payments due to case professionals for May 2026 monthly fee statements and email same to S. Moses.	0.50	$210.00
		Task Total:	9.10	$6,649.00

025 U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating

06/01/26	EPK	Emails with D. Flanagan of VeraCruz regarding the upcoming deadline for the seventh Rule 2015.3 report for Furrer Properties.	0.20	$200.00
06/02/26	EPK	Email correspondence with J. Pluth of RCBO and D. Flanagan of VeraCruz regarding supporting schedules for the next Furrer Properties Rule 2015.3 report (.1); review supporting schedules (.1).	0.20	$200.00
06/03/26	EPK	Email correspondence with D. Flanagan of VeraCruz and A. Bardos of RCBO regarding proposed filing version of the next Furrer Properties Rule 2015.3 report (.2); review the report, supporting schedules, and proposed filing copy (.2).	0.40	$400.00
06/04/26	EPK	Coordinate with J. Harrison regarding the filing and service of the next Furrer Properties Rule 2015.3 report.	0.20	$200.00

06/05/26	EPK	Follow up on filing and service of the Furrer Properties Rule 2015.3 report.	0.20	$200.00
06/17/26	EPK	Email correspondence with D. Flanagan of VeraCruz regarding preparation of the May 2026 MOR package (.2); preliminary review of MOR form (.1).	0.30	$300.00
06/18/26	EPK	Email correspondence with the VeraCruz team regarding updated May 2026 MOR package and incremental changes to property tax items in same.	0.20	$200.00
06/19/26	EPK	Review multiple iterations of the May 2026 MOR and supplemental exhibits, including new reporting exhibit for DIP loan draws and accrued interest (.9); confer with D. Flanagan of VeraCruz regarding comments to and questions regarding same (.6); email correspondence with A. Bardos regarding review and approval of proposed filing version of the May 2026 MOR (.2).	1.70	$1,700.00
06/22/26	EPK	Coordinate with J. Harrison regarding filing and service of the May 2026 MOR (.1); email correspondence with the RCBO and VeraCruz teams regarding MOR filing and supplemental MOR files for the BRG team (.1).	0.20	$200.00
06/22/26	JCH	File May 2026 monthly operating report and circulate filed copy of same to client group.	0.50	$210.00
		Task Total:	4.10	$3,810.00

026 Unsecured Creditor Issues/Communications/Meetings

06/01/26	MDL	Email exchange with J. Hogan regarding Bishop Barber's letter to the faithful about church closures.	0.10	$100.00
06/01/26	MDL	Telephone conference with J. Hogan regarding plan vote.	0.60	$600.00
06/02/26	MCM	Meet and confer with Committee counsel and S. Moses regarding discovery issues vis-a-vis RCC and other discovery requests in connection with confirmation.	1.10	$1,155.00

06/02/26	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding Committee discovery demand following RCC production.	0.30	$300.00
06/02/26	MDL	Email exchange with C. Restel (Lowenstein) regarding Committee allegations of late disclosures and document production.	0.10	$100.00
06/09/26	MDL	Email exchange with Lowenstein attorneys regarding vote designation stipulation and property sales stipulation.	0.30	$300.00
06/09/26	MDL	Prepare for telephone conference with C. Restel (Lowenstein) regarding vote designation stipulation.	0.10	$100.00
06/09/26	MDL	Telephone conference with C. Restel (Lowenstein) regarding vote designation stipulation.	0.40	$400.00
06/11/26	MDL	Telephone conference with M. Kaplan (Lowenstein) regarding witness order, motions in limine, and evidentiary issues.	0.40	$400.00
06/14/26	MRL	Analyze documents in preparation for the call with the Committee and insurers.	0.20	$160.00
		Task Total:	3.60	$3,615.00

027 Real Estate and Real Property Issues

06/09/26	MDL	Email exchange with E. Del Baccaro (TRI Commercial) regarding buyer interest in church properties.	0.10	$100.00
		Task Total:	0.10	$100.00

028 Tort Claims

06/01/26	KAFA	Finalize timelines and summaries of accused parties (1.4); finalize case severity analyses for accused parties (3.7).	5.10	$2,448.00
06/03/26	KAFA	Analysis of 3 jury verdicts received from M. Plevin (.4); call with A. Ouellette to discuss evaluation of additional cases to proffer to Judge Chatterjee for trial (.4).	0.80	$384.00

06/11/26	KAFA	Prepare pre-bankruptcy invoices submitted to the carriers for exhibit list (.4); review final CMC statement submitted to the court today as required regarding the identification of cases for the relief from stay (.3).	0.70	$336.00
06/22/26	KAFA	Research historical and pre-bankruptcy sex abuse claim settlements for Foley team in trial (1.1); communications with P. Glaessner regarding 2017 $3.5M settlement (.3).	1.40	$672.00
06/24/26	KAFA	Analysis of Pacific Insurers' response to proposed trial cases (.2); analysis of first amended notice of adoption of master complaint of John Doe X.X. (.2).	0.40	$192.00
		Task Total:	8.40	$4,032.00

031 Insurance Issues (coverage, includes adversary proceeding)

06/01/26	ERR	Begin review of insurer discovery requests in bankruptcy.	1.00	$1,250.00
06/01/26	ERR	Review edits to new trial brief (including from insurers).	1.50	$1,875.00
06/01/26	ERR	Review coverage letter from LMI and further communications from insurers regarding coverage.	0.70	$875.00
06/01/26	MDL	Revise proposed language for confirmation order regarding non-abuse policies.	0.30	$300.00
06/01/26	MDL	Email correspondence with J. Bonteque (Duane Morris) regarding language of plan confirmation order covering non-abuse policies.	0.20	$200.00
06/01/26	MR	Strategize with E. Ridley regarding discovery requests received from insurers (.3); begin drafting responses to various insurers' written discovery requests (1.1); perform privileged analysis of insurance issues in relation to JCCP state court proceedings (.6); continue reviewing additional documents for potential production to Insurers (2.6).	4.60	$3,910.00
06/02/26	ERR	Edit motion to seal regarding case selections.	0.50	$625.00

06/02/26	MR	Continue privileged analysis in furtherance of privileged strategy matter in insurance coverage action and underlying state court actions (2.8); continue reviewing additional documents for potential production to insurers (1.5).	4.30	$3,655.00
06/03/26	ERR	Review status of pending insurance discovery issues in bankruptcy proceedings including response to written discovery.	1.50	$1,875.00
06/03/26	MR	Email communications with E. Ridley and A. Uetz regarding privileged strategy matters relating to insurance coverage issues (.4); call with E. Ridley (.3); continue reviewing additional documents for potential production to insurers (1.1).	1.80	$1,530.00
06/04/26	AMUE	Review communications from counsel for Chubb regarding expert reports and response to same (.4); review communications with A. Wolter relating to confirmation brief and closing brief (.4).	0.80	$980.00
06/04/26	ERR	Begin review of pretrial motions regarding bankruptcy proceedings.	2.00	$2,500.00
06/04/26	ERR	Review status of potential claims regarding CIGA.	0.80	$1,000.00
06/04/26	ERR	Edit template response regarding pending requests for admissions regarding Committee.	1.00	$1,250.00
06/04/26	ERR	Review underlying cases and coverage for selection in state court regarding relief of stay.	3.00	$3,750.00
06/04/26	MR	Continue reviewing additional documents for potential production to insurers (2.1); continue privileged analysis in furtherance of privileged strategy matter in insurance coverage action and underlying state court actions (1.1).	3.20	$2,720.00
06/05/26	ERR	Review insurer motions in bankruptcy.	0.50	$625.00
06/05/26	ERR	Finalize email to insurers regarding selection of cases for relief from stay.	0.70	$875.00
06/08/26	ERR	Telephone conference with Ninth Circuit mediator administrator regarding pending appeals regarding relief from stay.	0.50	$625.00

06/08/26	ERR	Review post-pretrial hearing filings including objections to claims, witness lists and objections to trial schedule.	2.00	$2,500.00
06/08/26	KAFA	Communications with team regarding communications from J. Decena of Covington.	0.20	$96.00
06/08/26	MR	Complete review of additional documents for potential production to insurers, per request received in insurance coverage action.	3.20	$2,720.00
06/09/26	AROU	Analyze documents for production in response to request by insurers.	0.40	$400.00
06/09/26	ERR	Review plaintiffs' liaison counsel's selection of cases.	0.70	$875.00
06/09/26	ERR	Review order regarding consolidation of appeals regarding order for relief of stay.	0.50	$625.00
06/09/26	ERR	Review production of documents regarding Foley communications with plaintiffs' liaison counsel.	0.80	$1,000.00
06/09/26	ERR	Review status of discovery responses to Committee and insurer discovery in bankruptcy regarding insurance.	0.70	$875.00
06/09/26	KAFA	Analysis of London Market Insurers' objections to 10 proofs of claim.	0.60	$288.00
06/09/26	MR	Perform QC review of document production to insurers in insurance coverage action (.4); telephone call with E. Ridley regarding various privileged discovery strategy issues relating to insurance coverage action and insurance matters in chapter 11 plan confirmation proceedings (.4.).	0.80	$680.00
06/09/26	SJM	Attention to statements regarding verification of policies.	0.20	$185.00
06/10/26	AROU	Respond to correspondence from M. Plevin regarding submission regarding proposed cases for trial setting.	0.10	$100.00
06/10/26	ERR	Edit case management statement regarding Alameda cases and provide to insurers.	1.50	$1,875.00
06/11/26	TND	Prepare detailed information and email to Travelers with additional invoices related to state court trial.	0.60	$528.00

06/12/26	MDL	Telephone conference with F. Hall (Black Compean Hall) regarding possible settlement with CIGA.	0.30	$300.00
06/14/26	MDL	Email exchange with J. Bonteque (Duane Morris) regarding language in confirmation order addressing non-abuse insurance policies.	0.30	$300.00
06/16/26	ERR	Review status of discovery responses and stipulation regarding CIGA.	2.00	$2,500.00
06/16/26	MR	Review policy documents and analyze certain information therein, in furtherance of privileged strategy discussions with H. Johnson.	0.80	$680.00
06/17/26	ERR	Edit responses to requests for admission by insurers.	1.00	$1,250.00
06/17/26	ERR	Briefly review motions to dismiss the sixth amended complaint.	0.80	$1,000.00
06/17/26	ERR	Edit case management statement to state court actions and review edits to reply brief in support of new trial.	2.50	$3,125.00
06/17/26	JCH	Calendar response and reply deadlines related to motions to dismiss sixth amended complaint.	0.50	$210.00
06/17/26	MR	Summarize insurers' motions to dismiss sixth amended complaint in insurance coverage action.	1.60	$1,360.00
06/18/26	ERR	Review submission of case management statements to state court.	0.80	$1,000.00
06/18/26	ERR	Continue to review insurer motions to dismiss sixth amended complaint.	1.00	$1,250.00
06/18/26	ERR	Finalize reply brief regarding motion for new trial and forward to insurers.	1.00	$1,250.00
06/18/26	ERR	Review additional LMI policy and amendment to admissions and stipulation.	0.80	$1,000.00
06/19/26	ERR	Begin review of materials in preparation for Bishop Barber's testimony regarding insurance.	2.00	$2,500.00
06/19/26	MDL	Telephone conference with F. Hall (Black Compean & Hall) regarding CIGA-RCBO settlement options.	0.20	$200.00

06/19/26	TND	Review email from Travelers on payment (.1); discuss same with E. Ridley (.2); email to A. Bardos to request W-9 (.1).	0.40	$352.00
06/22/26	ERR	Review meet and confer letters to insurers regarding discovery issues.	0.50	$625.00
06/22/26	TND	Email to Travelers with requested W-9 for RCBO.	0.10	$88.00
06/23/26	ERR	Review Pacific statement regarding selection of cases.	0.80	$1,000.00
06/24/26	ERR	Review results of state court hearings before Judge Chatterjee and edit report regarding same to client.	1.00	$1,250.00
06/25/26	ERR	Prepare for and attend trial regarding confirmation including presentation of witness A. Bardos.	9.00	$11,250.00
06/25/26	MR	Draft letter to Westport regarding drop-down coverage obligations (1.1); analyze case law in relation to same (1.6).	2.70	$2,295.00
06/25/26	TND	Review issues related to reimbursement of costs.	0.20	$176.00
06/26/26	ERR	Review status of bankruptcy trial proceeding and strategy regarding further hearings.	0.60	$750.00
06/26/26	ERR	Review status of settlement discussions with CIGA.	0.50	$625.00
06/26/26	ERR	Review status of meet and confer efforts between insurers and RCBO.	0.50	$625.00
06/26/26	MR	Draft joint status report ordered to be filed by Judge Corley in insurance coverage action by June 30, 2026.	1.80	$1,530.00
06/28/26	ERR	Review materials from bankruptcy trial related to insurer review of witnesses and exhibits.	1.50	$1,875.00
06/28/26	MR	Emails with internal case team regarding privileged strategy matters in insurance coverage action.	0.40	$340.00
06/29/26	ERR	Review status of insurance claims in light of cases identified for trial.	1.00	$1,250.00
06/29/26	ERR	Review applicable case law and edit letter to Westport regarding drop down obligations.	1.50	$1,875.00
06/29/26	ERR	Edit joint case management statement.	1.00	$1,250.00

06/29/26	ERR	Review status of state actions set for trial and strategize regarding preparation.	1.50	$1,875.00
06/29/26	MR	Revise draft of joint status update in insurance coverage action and send draft to all counsel.	0.50	$425.00
06/29/26	TND	Request back-up travel cost documentation for Travelers.	0.10	$88.00
06/30/26	ERR	Make further edits to letter to Westport regarding.drop-down obligations.	1.00	$1,250.00
06/30/26	ERR	Review status of payment from insurers regarding first state court case.	0.50	$625.00
06/30/26	ERR	Finalize joint status report.	1.00	$1,250.00
06/30/26	MR	Revise joint status update in insurance coverage action per comments received from insurers and finalize same for filing (1.3); revise draft letter to Westport regarding drop-down insurance coverage obligations (.8); confer with E. Ridley regarding privileged strategy matters in insurance coverage action (.3); email communications with E. Ridley and D. Goodwin regarding same (.3); email communications to CNA's counsel responding to matters raised in insurance coverage action (.4).	3.10	$2,635.00
06/30/26	TND	Review documents from Travelers (.3); email vendor payment information to trial team (.1).	0.40	$352.00
		Task Total:	88.40	$96,748.00

032 Rule 2004 Motions/Discovery/Subpoenas

06/01/26	MRL	Continue revising the Debtor's responses to the Committee's supplemental discovery requests to conform to M. Lee's comments.	0.20	$160.00
06/01/26	MRL	Continue analyzing documents to make a production to the Committee.	0.30	$240.00
06/01/26	MRL	Draft a summary of all discovery issues to provide an update to the Foley team.	0.90	$720.00
06/01/26	MRL	Continue drafting a Daubert motion to exclude McNally's expert report.	0.90	$720.00

06/01/26	SJM	Review status of open discovery issues.	0.60	$555.00
06/02/26	KAFA	Update index of post-bankruptcy productions.	0.20	$96.00
06/02/26	MDL	Strategize with Foley team regarding trial testimony in light of expert witness deposition testimony.	0.40	$400.00
06/02/26	MDL	Telephone conference with K. Martens to review his deposition testimony.	0.20	$200.00
06/02/26	MRL	Finalize analyzing documents to make a production to the Committee.	0.40	$320.00
06/02/26	MRL	Continue drafting a Daubert motion to exclude K. McNally's expert report.	1.40	$1,120.00
06/02/26	MRL	Email correspondence with the Foley team regarding discovery requests.	0.40	$320.00
06/02/26	SJM	Analyze new Committee motion to compel regarding vote designation issues (.9); email to case team regarding approach to same (.5).	1.40	$1,295.00
06/02/26	SJM	Meet and confer call with M. Kaplan (1.1); follow-up call with M. Moore (.3); draft email summaries of call (.6).	2.00	$1,850.00
06/02/26	SJM	Call with P. Bongiovanni regarding RCWC real property (.2); call with D. Flanagan regarding issues related to discovery responses (.3).	0.50	$462.50
06/02/26	SJM	Address issues regarding Committee demand for meet and confer on real property collateral and appraisals.	3.40	$3,145.00
06/02/26	SJM	Draft email to M. Kaplan regarding agreement on meet and confer regarding responses to Committee first set of written discovery.	1.30	$1,202.50
06/03/26	MCM	Attention to Committee discovery requests and related issues.	0.70	$735.00
06/03/26	MRL	Continue drafting a Daubert motion to exclude K. McNally's expert report.	0.90	$720.00
06/03/26	MRL	Continue revising the Debtor's responses to the Committee's supplemental discovery requests to conform to M. Moore's comments.	0.50	$400.00
06/03/26	MRL	Email correspondence with the Foley team regarding discovery requests.	0.20	$160.00

06/03/26	SJM	Email to M. Kaplan documenting meet and confer agreement (.3); follow-up calls with M. Kaplan regarding same (.2).	0.50	$462.50
06/03/26	SJM	Attention to remaining open discovery issues.	2.60	$2,405.00
06/04/26	JCH	File notice of withdrawal of motion to compel.	0.20	$84.00
06/04/26	MCM	Attention to Debtor's responses to Committee's second set of interrogatories and related issues.	0.70	$735.00
06/04/26	MRL	Email correspondence with the Foley team regarding the outstanding discovery requests.	0.20	$160.00
06/04/26	MRL	Continue drafting a Daubert motion to exclude K. McNally's expert report (1.5); draft the declaration in support of the motion (1.0); email correspondence regarding finalizing and filing the motions (.7).	3.20	$2,560.00
06/04/26	SJM	Analyze approach to designation motion and related discovery.	1.60	$1,480.00
06/04/26	SJM	Email to Committee counsel regarding deposition designations of Committee witnesses.	0.40	$370.00
06/04/26	SJM	Review notice of withdrawal of motion to compel.	0.10	$92.50
06/04/26	SJM	Attention to production of additional emails to resolve Committee motion to compel.	0.80	$740.00
06/04/26	SJM	Review notices of hearing on five discovery motions.	0.50	$462.50
06/04/26	SJM	Initial analysis of Committee and insurer discovery motions.	0.80	$740.00
06/04/26	SJM	Email to client regarding summary of filed discovery motions.	0.80	$740.00
06/04/26	SJM	Analyze approach to response to Committee RFAs on insurance coverage.	0.30	$277.50
06/04/26	SJM	Emails with insurer counsel regarding application for over-length confirmation brief (.6); call with M. Lee regarding same (.2).	0.80	$740.00
06/05/26	KAFA	Update index of post-bankruptcy productions.	0.20	$96.00
06/05/26	MRL	Analyze documents to produce to the Committee.	1.60	$1,280.00

06/05/26	SJM	Call with M. Kaplan regarding resolution of motion to compel on designation issues (.3); email documenting agreement on same (.4).	0.70	$647.50
06/05/26	SJM	Further analysis of Committee and insurer discovery motions.	0.70	$647.50
06/05/26	SJM	Supervise production of additional documents to the Committee.	0.60	$555.00
06/07/26	MRL	Email correspondence with the Foley team regarding responses to the Committee's supplemental discovery requests.	0.40	$320.00
06/07/26	MRL	Draft an email to the Foley team regarding the discovery motions drafted (.4); analyze the Committee's and the insurers' motions (.9).	1.30	$1,040.00
06/07/26	MRL	Begin drafting an objection to the Committee's motion to exclude K. Martens' testimony.	0.50	$400.00
06/07/26	SJM	Revise stipulation regarding real property to address amount of deferred RCC rights.	0.60	$555.00
06/07/26	SJM	Prepare draft supplemental responses to interrogatories.	2.10	$1,942.50
06/08/26	MDL	Revise Debtor's written discovery responses.	1.70	$1,700.00
06/08/26	MRL	Analyze the motions in limine filed by the Committee and insurers.	0.30	$240.00
06/08/26	MRL	Draft the Debtor's omnibus response to the motions in limine.	0.30	$240.00
06/08/26	MRL	Continue drafting an objection to the Committee's motion to exclude K. Martens' testimony.	1.10	$880.00
06/08/26	MRL	Email correspondence with M. Lee regarding revisions to the responses to the Committee's supplemental requests.	0.30	$240.00
06/08/26	MRL	Email correspondence with the Foley team regarding the discovery requests.	0.30	$240.00
06/09/26	MRL	Continue drafting the Debtor's omnibus response to the motions in limine.	0.30	$240.00
06/09/26	MRL	Finalize the responses to the Committee's supplemental discovery requests.	0.60	$480.00
06/09/26	MRL	Continue drafting an objection to the Committee's motion to exclude K. Martens' testimony.	2.50	$2,000.00

06/09/26	SJM	Brief review of real property stipulation.	0.30	$277.50
06/09/26	SJM	Finalize supplemental interrogatory responses.	0.30	$277.50
06/10/26	MRL	Continue drafting an objection to the Committee's motion to exclude K. Martens' testimony.	1.90	$1,520.00
06/10/26	MRL	Revise the Debtor's omnibus response to the motions in limine to conform to M. Moore's comments.	1.70	$1,360.00
06/11/26	MRL	Email correspondence with the Foley team regarding status of discovery requests.	0.40	$320.00
06/11/26	MRL	Email correspondence with the Foley team regarding the deposition designations.	0.30	$240.00
06/11/26	MRL	Correspondence with M. Moore regarding the hearing on the discovery motions.	0.20	$160.00
06/12/26	MRL	Finalize and serve the discovery responses to the Committee's requests.	0.60	$480.00
06/12/26	SJM	Final review of responses to 345 requests for admission regarding insurance coverage.	0.40	$370.00
06/12/26	SJM	Analyze letter from Committee regarding testimony on availability of financing.	0.60	$555.00
		Task Total:	53.10	$46,173.50

034 Other Motion Practice

06/01/26	SJM	Follow up regarding status of May 21 transcript.	0.20	$185.00
		Task Total:	0.20	$185.00

037 Financing

06/01/26	MDL	Telephone conference with R. Gies and R. Seelin (both of RCC) and RCC's counsel regarding DIP loan and exit loan collateral.	0.50	$500.00
06/01/26	SJM	Email to client regarding status of DIP motion (.6); prepare supplement in support of DIP motion (1.3).	1.90	$1,757.50

06/01/26	SJM	Call with A. Bardos, D. Flanagan, and C. de Quesada regarding real property sales and exit facility collateral (.5); meeting with D. Flanagan, A. Bardos, M. Lee, R. Gies, R. Seelin, and R. Manns regarding exit facility collateral (.6); follow-up call with R. Manns regarding same (.2).	1.30	$1,202.50
06/01/26	SJM	Call with R. Manns regarding exit facility collateral.	0.30	$277.50
06/01/26	SJM	Work on finalizing list of exit facility collateral.	0.80	$740.00
06/01/26	SJM	Summarize status of exit facility collateral in light of RCC position on same.	0.60	$555.00
06/02/26	MDL	Email exchange with Committee and RCC counsel regarding terms of DIP order and DIP credit agreement.	0.20	$200.00
06/02/26	SJM	Call with R. Manns regarding exit facility.	0.40	$370.00
06/02/26	SJM	Attention to confirmation of real property collateral.	0.30	$277.50
06/03/26	MCM	Attend final hearing on DIP financing.	0.50	$525.00
06/03/26	SJM	Finalize order on DIP financing (.3); email to R. Manns and J. Prol regarding same (.2).	0.50	$462.50
06/05/26	SJM	Analyze issues regarding cash flows for payment of RCC exit facility (.5); call with D. Flanagan regarding same (.4); email to R. Manns regarding same (.2).	1.10	$1,017.50
		Task Total:	8.40	$7,885.00

039 JCCP 5108 Litigation (Case No. HG19048685) – Claim No. 63

06/01/26	AROU	Finalize motion for new trial and supporting materials.	1.20	$1,200.00
06/01/26	JRDO	Continue to draft request for judicial notice in support of motion for new trial.	1.20	$810.00
06/01/26	JRDO	Finalize memorandum of points and authorities, declarations, request for judicial notice, and proposed orders in support of motion for new trial.	3.50	$2,362.50

06/01/26	KAFA	Analysis of multiple revisions to brief (and accompanying documents) in support of motion for new trial.	0.60	$288.00
06/01/26	TFCA	Numerous emails regarding changes to final brief and emails addressing same.	1.00	$1,525.00
06/02/26	JRDO	Analyze upcoming opposition and reply brief deadlines following filing of motion for new trial.	0.10	$67.50
06/06/26	JRBL	Strategize with T. Carlucci regarding settlement proposals and strategy.	0.80	$1,260.00
06/10/26	TFCA	Emails regarding opposition.	0.40	$610.00
06/11/26	AROU	Strategize regarding response to plaintiff's opposition to motion for new trial.	1.00	$1,000.00
06/11/26	JRDO	Begin to analyze plaintiff's opposition to motion for new trial in preparation for drafting reply in support of motion.	0.60	$405.00
06/11/26	JRDO	Strategize with attorney team on drafting reply in support of motion for new trial brief.	0.10	$67.50
06/11/26	KAFA	Coordinate direct and immediate payment of outstanding court reporter invoices and plaintiff's memo of costs.	0.50	$240.00
06/12/26	KAFA	Analysis of plaintiff's opposition to motion for new trial, including supporting filings.	0.50	$240.00
06/15/26	AROU	Strategize regarding response to plaintiff's opposition to motion for new trial.	0.60	$600.00
06/15/26	JRDO	Strategize with attorney team on drafting reply in support of motion for new trial.	0.30	$202.50
06/15/26	JRDO	Research plaintiff's cited authority in opposition to motion for new trial in preparation for drafting reply in support of motion.	1.00	$675.00
06/15/26	JRDO	Begin to draft reply in support of motion for new trial by drafting argument sections.	4.20	$2,835.00
06/16/26	AROU	Revise draft reply brief in support of motion for new trial.	2.60	$2,600.00
06/16/26	JRDO	Continue to draft reply in support of motion for new trial by drafting argument and introduction sections.	4.10	$2,767.50

06/16/26	TFCA	Provide edits to E. Hamling.	0.50	$762.50
06/17/26	AROU	Revise reply brief in support of motion for new trial.	1.10	$1,100.00
06/17/26	JRDO	Continue drafting reply in support of motion for new trial by revising argument section and drafting declaration in support of reply.	1.40	$945.00
06/17/26	JRDO	Strategize with attorney team on revisions to reply in support of motion for new trial.	0.30	$202.50
06/17/26	JRDO	Strategize with attorney team on insurer and bad faith counsel comments to reply brief in support of motion for new trial.	0.40	$270.00
06/17/26	JRDO	Revise reply brief in support of motion for new trial following insurer and bad faith counsel comments.	0.40	$270.00
06/17/26	KAFA	Attend to payment of invoices from trial.	0.20	$96.00
06/17/26	TFCA	Review final reply regarding new trial (.5); review insurers' comments and emails (.3).	0.80	$1,220.00
06/18/26	JRDO	Finalize reply brief and supporting documents in support of motion for new trial.	1.50	$1,012.50
06/18/26	TFCA	Review insurance edits.	0.50	$762.50
06/18/26	WD	Amend declaration in support of reply to motion for new trial (.2); prepare exhibit to declaration (.2); cite check reply in support of motion for new trial (1.5); format and add tables to reply in support of motion for new trial (.7); serve reply in support of motion for new trial and supporting declaration (.2); coordinate e-filing of motion for new trial and supporting declaration (.1); coordinate delivery of chambers copies of motion for new trial and all supporting papers (.1).	3.00	$1,440.00
06/23/26	JRDO	Research California authority to determine appellate deadline following motion for new trial.	0.60	$405.00
06/24/26	JRDO	Strategize with attorney team on motion for new trial and upcoming case deadlines.	0.20	$135.00
06/25/26	JRDO	Strategize with attorney team on upcoming trial schedule and preparing for hearing on motion for new trial.	0.60	$405.00

06/26/26	JRDO	Analyze order setting upcoming trials.	0.10	$67.50
06/29/26	JRDO	Strategize with attorney team on preparation for upcoming trials, including case staffing, discovery planning, witness and records development, expert needs, and anticipated motions practice.	1.80	$1,215.00
		Task Total:	37.70	$30,064.00

040 JCCP 5108 Litigation (Case No. 22CV020490) – Claim No. 182

06/23/26	AROU	Coordinate with co-counsel regarding status of action.	0.10	$100.00
		Task Total:	0.10	$100.00

041 JCCP 5108 Litigation (Case No. 22CV017382) – Claim No. 522

06/29/26	AROU	Strategize regarding status of action, discovery plan, and trial schedule.	0.40	$400.00
		Task Total:	0.40	$400.00

042 JCCP 5108 Litigation (Case No. 22CV015222) – Claim No. 384

06/29/26	AROU	Strategize regarding status of action, discovery plan, and trial schedule.	0.40	$400.00
		Task Total:	0.40	$400.00

043 JCCP 5108 Litigation (Case No. 22CV023118) – Claim No. 52

06/29/26	AROU	Strategize regarding status of action, discovery plan, and trial schedule.	0.40	$400.00
		Task Total:	0.40	$400.00

044 JCCP 5108 Litigation (Case No. 22CV02733) – Claim No. 47

06/29/26	AROU	Strategize regarding status of action, discovery plan, and trial schedule.	0.40	$400.00
		Task Total:	0.40	$400.00

046 JCCP 5108 Litigation (Case No. 22CV023400) – Claim No. 230

06/25/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 230).	1.10	$1,100.00
06/26/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 230).	0.80	$800.00
06/29/26	AROU	Strategize regarding the transcript from the deposition of plaintiff.	0.60	$600.00
06/29/26	EES	Begin preparing for trial (2.5); develop offensive discovery strategy designed to obtain information needed for November trial in a timely and efficient manner (1.7).	4.20	$3,255.00
06/30/26	JRDO	Draft informal discovery letter to counsel requesting documents to be used at trial be produced.	2.50	$1,687.50
06/30/26	KAFA	Compile documentation and information regarding case (and summarize same) in preparation for trial as requested by A. Ouellette.	1.10	$528.00
		Task Total:	10.30	$7,970.50

047 JCCP 5108 Litigation (Case No. 22CV022633) – Claim No. 76

06/25/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 76).	1.10	$1,100.00
06/26/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 76).	0.80	$800.00
06/30/26	JRDO	Strategize with attorney team on proposed order setting new trial schedule for upcoming matters.	0.10	$67.50

06/30/26	KAFA	Compile documentation and information regarding case (and summarize same) in preparation for trial as requested by A. Ouellette.	1.10	$528.00
		Task Total:	3.10	$2,495.50

048 JCCP 5108 Litigation (Case No. 22CV020135) – Claim No. 172

06/25/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 172).	1.10	$1,100.00
06/26/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 172).	0.90	$900.00
06/29/26	AROU	Strategize regarding priest file for case.	0.90	$900.00
06/30/26	AROU	Strategize regarding priest file for case.	0.80	$800.00
06/30/26	KAFA	Compile documentation and information regarding case (and summarize same) in preparation for trial as requested by A. Ouellette.	1.10	$528.00
		Task Total:	4.80	$4,228.00

049 JCCP 5108 Litigation (Case No. 22CV020348) – Claim No. 144

06/25/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 144).	1.10	$1,100.00
06/26/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 144).	0.90	$900.00
06/29/26	AROU	Strategize regarding priest file for case.	0.90	$900.00
06/30/26	AROU	Analyze and strategize regarding priest file for case.	0.80	$800.00
06/30/26	KAFA	Compile documentation and information regarding case (and summarize same) in preparation for trial as requested by A. Ouellette.	1.10	$528.00
		Task Total:	4.80	$4,228.00

050 JCCP 5108 Litigation (Case No. 23CV030984) – Claim No. 552

06/25/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 552).	1.10	$1,100.00
06/26/26	AROU	Attention to status of action and determine discovery strategy. (Claim No. 552).	0.90	$900.00
06/29/26	AROU	Strategize regarding priest file for case.	0.70	$700.00
06/29/26	AROU	Strategize regarding status of action, discovery plan, and trial schedule.	0.40	$400.00
06/30/26	AROU	Strategize regarding priest file for case.	0.60	$600.00
06/30/26	KAFA	Compile documentation and information regarding case (and summarize same) in preparation for trial as requested by A. Ouellette.	1.10	$528.00
		Task Total:	4.80	$4,228.00

051 JCCP 5108 Litigation (Case No. 22CV018558) – Claim No. 486

06/29/26	AROU	Attention to status of action and determine discovery strategy.	0.70	$700.00
06/30/26	JRDO	Research legal counsel for plaintiffs in preparation for drafting motion to disqualify.	0.80	$540.00
06/30/26	KAFA	Compile documentation and information regarding case (and summarize same) in preparation for trial as requested by A. Ouellette.	1.10	$528.00
		Task Total:	2.60	$1,768.00
		Services Total:	2,054.70	$1,996,659.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Emma E. Soldon	EES	Associate	4.20	$775.00	$3,255.00
Jack R. Doti	JRDO	Associate	25.80	$675.00	$17,415.00
Michael H. Holland	MHH	Associate	5.50	$750.00	$4,125.00
Mason Roberts	MR	Associate	55.80	$850.00	$47,430.00
Mary Rofaeil	MRL	Associate	214.90	$800.00	$171,920.00

Michael W. Berg	MWBE	Associate	0.10	$0.00	$0.00
Nathan C. Walsh	NCW	Associate	36.70	$650.00	$23,855.00
Nora McGuffey	NMCG	Associate	280.80	$825.00	$231,660.00
Shane J. Moses	SJM	Of Counsel	213.50	$925.00	$197,487.50
Janelle C. Harrison	JCH	Paralegal	41.60	$420.00	$17,472.00
Jesus Torres	JT	Paralegal	119.70	$460.00	$55,062.00
Kerry A. Farrar	KAFA	Paralegal	32.20	$480.00	$15,456.00
Wendy DelValle	WD	Paralegal	8.10	$480.00	$3,888.00
Ann Marie Uetz	AMUE	Partner	227.10	$1,225.00	$278,197.50
Alan R. Ouellette	AROU	Partner	66.60	$1,000.00	$66,600.00
David B. Goroff	DBG	Partner	219.60	$1,423.59	$312,620.00
Emil P. Khatchatourian	EPK	Partner	3.60	$1,000.00	$3,600.00
Eileen R. Ridley	ERR	Partner	108.20	$1,250.00	$135,250.00
Geoffrey S. Goodman	GSG	Partner	0.20	$0.00	$0.00
Jeff R. Blease	JRBL	Partner	0.80	$1,575.00	$1,260.00
Mark C. Moore	MCM	Partner	221.80	$1,050.00	$232,890.00
Matthew D. Lee	MDL	Partner	107.40	$1,000.00	$107,400.00
Thomas F. Carlucci	TFCA	Partner	25.70	$1,525.00	$39,192.50
Tamar N. Dolcourt	TND	Special Counsel	34.80	$880.00	$30,624.00
Totals			**2,054.70**		**$1,996,659.50**

Expenses Incurred

Description	**Amount**
Depositions / Transcripts, Exams	$37,976.28
Electronic Legal Research Services	$71.65
LSS - eDiscovery Services	$14,200.00
Mailing Expense	$158.00
Meals	$5,618.00
Other Fees	$46.00
Photocopying Charges	$166.72
Recording / Filing Fees	$379.60
Transcripts	$5,695.80
Transportation / Travel Expenses	$3,666.99
Expenses Incurred Total	**$67,979.04**

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

Expense Detail

Depositions / Transcripts, Exams

Date	Initials	Description	Amount
03/03/26	JRBL	Steno Agency - Transcript of deposition of Jayme Jones conducted 2/24/26 - 03/03/26.	$1,510.56
03/03/26	JRBL	Steno Agency - Transcript of the deposition of Jennifer Keller PhD conducted on 2/26/26 - 03/03/26.	$3,071.54
03/09/26	JRBL	Steno Agency - Transcript of hearing conducted on 3/5/26, Alameda Superior Court - 03/09/26.	$1,691.50
03/11/26	JRBL	Steno Agency - Transcript of hearing conducted 3/9/26, Alameda Superior Court - 03/11/26.	$1,302.50
04/29/26	JRBL	Reversed on 7/9/2026. Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 1 of trial - 04/29/26.	($1,680.00)
04/29/26	JRBL	Reversed on 7/9/2026. Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 5 of trial - 04/29/26.	($1,800.00)
04/29/26	JRBL	Reversed on 7/9/2026. Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 3 of trial - 04/29/26.	($1,640.00)
04/29/26	JRBL	Reversed on 7/9/2026. Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 4 of trial - 04/29/26.	($1,695.00)
05/11/26	JRBL	HUDSON REPORTING & VIDEO, INC. - Copy of transcript of Daniel Flanagan's deposition (Volume II), April 28, 2026 - 05/11/26.	$1,998.15
06/01/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript, Day 2 of trial - 06/01/26.	$264.60
06/01/26	JRBL	ESCRIBERS, LLC - Copy of Hearing Transcript - 06/01/26.	$73.95
06/01/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript - 06/01/26.	$529.25
06/02/26	JRBL	PLANET DEPOS, LLC - Expedited Transcript Services - 06/02/26.	$2,977.85
06/02/26	JRBL	PLANET DEPOS, LLC - Expedited Transcript Services - 06/02/26.	$4,463.25

06/02/26	JRBL	PLANET DEPOS, LLC - Expedited Transcript Services - 06/02/26.	$2,863.25
06/03/26	JRBL	Pizzotti & Jarnagin - RCBO's 1/2 share of transcript - Hearing setting case management conference - 06/03/26.	$908.78
06/04/26	JRBL	HUDSON REPORTING & VIDEO, INC. - Transcript Services - 06/04/26.	$1,158.80
06/07/26	JRBL	PLANET DEPOS, LLC - Expedited Transcript Services - 06/07/26.	$3,217.70
06/07/26	JRBL	PLANET DEPOS, LLC - Expedited Transcript Services - 06/07/26.	$3,022.90
06/15/26	JRBL	FORTZ LEGAL SUPPORT, LLC - Fee for expedited transcript of deposition of Charles Moore, May 28, 2026 - 06/15/26.	$1,393.20
06/30/26	JRBL	FORTZ LEGAL SUPPORT, LLC - Rough transcript - Day 2 - 06/30/26.	$2,625.50
06/30/26	JRBL	FORTZ LEGAL SUPPORT, LLC - Rough transcript - Day 1 - 06/30/26.	$2,596.25
06/30/26	JRBL	FORTZ LEGAL SUPPORT, LLC - Rough transcript - Day 4 - 06/30/26.	$2,498.75
06/30/26	JRBL	FORTZ LEGAL SUPPORT, LLC - Rough transcript - Day 3 - 06/30/26.	$2,511.75
06/30/26	JRBL	FORTZ LEGAL SUPPORT, LLC - Rough transcript - Day 5 - 06/30/26.	$1,531.25
06/30/26	JRBL	FORTZ LEGAL SUPPORT, LLC - Rough transcript - Day 6 - 06/30/26.	$2,580.00
			$37,976.28

Electronic Legal Research Services

Date	Initials	Description	Amount
06/30/26	CJW	DOCKET REPORT. Westlaw.	$71.65

LSS - eDiscovery Services

Date	Initials	Description	Amount
06/30/26	JRBL	LSS - eDiscovery Services.	$14,200.00

Mailing Expense

Date	Initials	Description	Amount
06/11/26	JRBL	DAY N NITE INC. - Special delivery - David Goroff Rush Service.	$158.00

Meals

Date	Initials	Description	Amount
05/21/26	CACL	Lunch--VENDOR: U.S. BANK 05/21/26 RCBO Deposition in Chicago – David Goroff (9 attendees).	$314.11

05/27/26	CACL	Lunch--VENDOR: U.S. BANK 05/27/26 RCBO Deposition of P. Shields in Chicago – David Goroff (9 attendees).	$282.27
05/28/26	CACL	Lunch--VENDOR: U.S. BANK 05/28/26 RCBO Deposition in Chicago – David Goroff (add-on).	$21.55
05/28/26	CACL	Lunch--VENDOR: U.S. BANK 05/28/26 Ann Marie Uetz Meeting/Deposition in Chicago (9 attendees).	$265.24
05/28/26	CACL	Lunch--VENDOR: U.S. BANK 05/28/26 RCBO Meeting in Chicago - - David Goroff (add-on).	$10.40
05/29/26	CACL	Lunch--VENDOR: U.S. BANK 05/29/26 RCBO Meeting/Deposition in Chicago - - David Goroff (9 attendees).	$249.24
06/01/26	MCM	Dinner--VENDOR: Mark C. Moore 06/01/26 Dinner in NYC - Mark C. Moore.	$120.67
06/02/26	DBG	Lunch--VENDOR: David Goroff 06/02/26 - Deposition in NYC - David Goroff.	$25.61
06/02/26	DBG	Dinner--VENDOR: David Goroff 06/02/26 - Deposition in NYC - - David Goroff and Mark C. Moore.	$143.96
06/07/26	JRBL	GRUBHUB HOLDINGS INC - catered lunch for meeting in NYO on 06/02/26 (11 attendees).	$433.18
06/07/26	JRBL	GRUBHUB HOLDINGS INC - catered lunch for deposition in NYC on 06/03/26 (12 attendees).	$459.48
06/07/26	JRBL	GRUBHUB HOLDINGS INC - catered breakfast for deposition in NYC on 06/03/26 (5 attendees).	$103.17
06/07/26	JRBL	GRUBHUB HOLDINGS INC - catered breakfast for meeting in NYO on 06/02/26 (5 attendees).	$117.27
06/08/26	MDL	Lunch--VENDOR: U.S. BANK 06/08/26 Lunch for RCBO trial team. - - Mark C. Moore, David Goroff, Ann Marie Uetz, Matt Lee.	$142.81
06/09/26	MDL	Breakfast--VENDOR: U.S. BANK 06/09/26 Breakfast for RCBO trial team. - - Ann Marie Uetz, David Goroff, Mark C. Moore.	$87.02
06/09/26	MDL	Lunch--VENDOR: U.S. BANK 06/09/26 Lunch for RCBO trial team. - - Ann Marie Uetz, David Goroff, Mark C. Moore, Matt Lee.	$145.81
06/10/26	24034	Lunch--VENDOR: U.S. BANK 06/10/26 Lunch during Trial Preparation with 2 clients C/M 100845-0402 Dallas - - Mark C. Moore, Shane J. Moses.	$85.66
06/15/26	MDL	Lunch--VENDOR: U.S. BANK 06/15/26 Lunch for the trial team. - - Mark C. Moore, Alan Ouellette, David Goroff, Mary Rofaeil, Nora McGuffey, Jesus Torres, Nia Ortega, Matt Lee.	$283.33
06/15/26	24034	Lunch--VENDOR: U.S. BANK 06/15/26 Lunch during Trial Preparation C/M 100845-0402 Dallas - - Mark C. Moore, Shane J. Moses, Matt Lee, Nora McGuffey, Mary Rofaeil, Jesus Torres, Nia Ortega.	$92.67
06/16/26	MDL	Lunch--VENDOR: U.S. BANK 06/16/26 Lunch for the trial team. - - Mark C. Moore, Ann Marie Uetz, David Goroff, Shane J. Moses, Mary Rofaeil, Nora McGuffey, Jesus Torres, Nia Ortega, Matt Lee.	$370.99
06/16/26	24034	Lunch--VENDOR: U.S. BANK 06/16/26 Lunch during Trial C/M 100845-0402 - - Tammy L. Cowser (14 attendees).	$98.70

06/16/26	NO	Lunch--VENDOR: Nia Ortega 06/16/26 additional lunch items for trial team and clients during day 2 of trial - - Nia Ortega, Ann Marie Uetz.	$27.76
06/17/26	24034	Meals Other--VENDOR: U.S. BANK 06/17/26 Beverages for the team during Trial C/M 100845-0402 - - Tammy L. Cowser (10 attendees).	$124.97
06/17/26	MCM	Lunch--VENDOR: Mark C. Moore 06/17/26 Lunch during in-office work on 6/17. - - Mark C. Moore, Nia Ortega, Nora McGuffey, Mary Rofaeil, Matt Lee.	$107.53
06/22/26	MDL	Lunch--VENDOR: U.S. BANK 06/22/26 Lunch for trial team. - - Mark C. Moore, Ann Marie Uetz, David Goroff, Shane J. Moses, Matt Lee, Nora McGuffey, Mary Rofaeil, Nia Ortega, Jesus Torres.	$357.56
06/22/26	MDL	Meals Other--VENDOR: Matt Lee 06/22/26 RCBO Confirmation Trial Coffee for full trial team (10 attendees).	$86.86
06/22/26	24034	Breakfast--VENDOR: U.S. BANK 06/22/26 Food/drinks during trial C/M 100845-0402 Dallas - - Tammy L. Cowser (8 attendees).	$106.50
06/23/26	24034	Lunch--VENDOR: U.S. BANK 06/23/26 Lunch for Trial Team C/M 100845-0402 - - Tammy L. Cowser (8 attendees).	$143.50
06/23/26	NO	Breakfast--VENDOR: Nia Ortega 06/23/26 coffee for team before trial (8 attendees).	$47.44
06/25/26	24034	Lunch--VENDOR: U.S. BANK 06/25/26 Lunch for Trial Team C/M 100845-0402 - - Tammy L. Cowser (10 attendees).	$195.50
06/25/26	NO	Breakfast--VENDOR: Nia Ortega 06/25/26 coffee for team before trial (7 attendees).	$39.84
06/29/26	24034	Lunch--VENDOR: U.S. BANK 06/29/26 Lunch for Trial Team C/M 100845-0402 - - Tammy L. Cowser (7 attendees).	$140.35
06/29/26	NO	Breakfast--VENDOR: Nia Ortega 06/29/26 coffee for team before trial (7 attendees).	$32.02
06/30/26	JRBL	GRUBHUB HOLDINGS INC - Lemongrass Thai order for RCBO - 06/30/26 (10 attendees).	$355.03
			$5,618.00

Other Fees

Date	Initials	Description	Amount
06/30/26	JRBL	CASE ANYWHERE, LLC - search fees - 06/01/26.	$46.00

Photocopying Charges

Date	Initials	Description	Amount
06/22/26	NMCG	Document Reproduction--VENDOR: Nora McGuffey 06/22/26 RCBO Confirmation Trial - June 14 -30, 2026 - Documents printed for deposition -.	$88.38
06/22/26	NMCG	Document Reproduction--VENDOR: Nora McGuffey 06/22/26 RCBO Confirmation Trial - June 14 -30, 2026 - Documents printed for deposition -.	$74.09

06/22/26	NMCG	Document Reproduction--VENDOR: Nora McGuffey 06/22/26 RCBO Confirmation Trial - June 14 -30, 2026 - Documents printed for deposition -.	$4.25
			$166.72

Recording / Filing Fees

Date	Initials	Description	Amount
06/05/26	JRBL	ACE ATTORNEY SERVICE, INC. - efiling - 06/05/26.	$49.70
06/23/26	JRBL	ACE ATTORNEY SERVICE, INC. - efiling, PDF chamber copy - 06/23/26.	$329.90
			$379.60

Transcripts

Date	Initials	Description	Amount
05/11/26	JRBL	HUDSON REPORTING & VIDEO, INC. - Transcript of M. Babcock deposition - 05/11/26.	$5,695.80

Transportation / Travel Expenses

Date	Initials	Description	Amount
06/01/26	MCM	Taxi/Car Service--VENDOR: Mark C. Moore - NYC.	$125.00
06/02/26	MCM	Taxi/Car Service--VENDOR: Mark C. Moore - NYC.	$134.44
06/02/26	DBG	Taxi/Car Service--VENDOR: David Goroff - Travel to NYC for Deposition in RCBO matter.	$210.18
06/02/26	DBG	Taxi/Car Service--VENDOR: David Goroff - Travel to NYC for Deposition in RCBO matter.	$155.16
06/03/26	MCM	Lodging--VENDOR: Mark C. Moore - NYC.	$1,597.40
06/03/26	DBG	Lodging--VENDOR: David Goroff - Travel to NYC for Deposition in RCBO matter.	$1,046.57
06/03/26	DBG	Taxi/Car Service--VENDOR: David Goroff - Travel to NYC for Deposition in RCBO matter.	$173.06
06/03/26	DBG	Taxi/Car Service--VENDOR: David Goroff - Travel to NYC for Deposition in RCBO matter.	$210.18
06/24/26	TFCA	Parking--VENDOR: Tom Carlucci - Parking re attendance at RCBO status conference.	$15.00
			$3,666.99

Expense Total: $67,979.04

FOLEY

FOLEY & LARDNER LLP

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Roman Catholic Bishop of Oakland
Attn: Attila Bardos
Chief Financial Officer
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: August 31, 2026
Invoice No.: 51366695
Our Ref. No.: 100845-0402

Services through July 31, 2026

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	$745,964.00
Total Expenses:	$19,125.71
Amount Due:	**$765,089.71**

Please reference your invoice number 51366695 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of this invoice.

Federal Employer Number: 39-0473800

Professional Services Detail

004 Bankruptcy Litigation/Adversary Proceedings

07/01/26	JCH	Calendar continued Case Management Conference and hearing on motions to dismiss in adversary proceeding.	0.20	$84.00
07/14/26	JCH	Calendar rescheduled case management conference and hearing on motions to dismiss.	0.20	$84.00
		Task Total:	0.40	$168.00

005 Bar Date Motion/ Claims Reconcil./ Claim Reconciliation Issues

07/07/26	MCM	Analysis of outstanding requests for approval of late-filed claims prior to hearings on same.	1.00	$1,050.00
07/08/26	MRL	Correspondence with M. Moore regarding the hearing on the late-filed claim.	0.30	$240.00
07/09/26	MCM	Analysis of issues pertaining to late-filed claims where claimants now seek allowance as timely-filed following hearing on claim 563.	0.50	$525.00
07/13/26	AMUE	Review email received from S. Stehling and communication with M. Moore to address late-filed claims motion.	0.50	$612.50
07/13/26	JCH	Calendar hearing and objection deadline to John Doe AO motion to allow late-filed claim.	0.20	$84.00
07/13/26	MCM	Analyze latest filing attempting to enlarge bar date and correspondence with client parties regarding same.	0.60	$630.00
07/13/26	MRL	Analyze the motion to allow the late-filed claim.	0.40	$320.00
07/28/26	MCM	Email correspondence with counsel for claimant 532 following hearing.	0.30	$315.00
07/29/26	AMUE	Communications with Foley team regarding hearing on motion regarding late-filed claim.	0.50	$612.50
07/29/26	JCH	Prepare draft opposition to claimant John Doe AO's motion to allow late-filed claim (.3); prepare draft opposition to movant/Survivor 532's motion to allow late-filed claim (.3).	0.60	$252.00

07/29/26	MRL	Correspondence with the Foley team regarding the objections to the late-filed claims (.3); draft the Debtor's opposition to the late-filed claim (.2).	0.50	$400.00
07/30/26	AMUE	Communications with client leadership and with M. Moore regarding late-filed claims.	0.50	$612.50
07/30/26	MCM	Email correspondence with client parties regarding motions to allow late-filed claims and debrief from hearing on same.	0.50	$525.00
		Task Total:	6.40	$6,178.50

006 Case Administration (docket updates, WIP, and calendar)

07/01/26	JCH	Update daily docket report.	0.50	$210.00
07/02/26	JCH	Update daily docket report.	0.50	$210.00
07/06/26	JCH	Update daily docket report.	0.50	$210.00
07/07/26	EPK	Email correspondence with D. Flanagan of VeraCruz and R. Dayao of RCBO regarding Committee expense reimbursement requests.	0.20	$200.00
07/07/26	JCH	Update master case calendar and timeline (.5); update daily docket report (.5).	1.00	$420.00
07/08/26	JCH	Update daily docket report.	0.50	$210.00
07/09/26	JCH	Update daily docket report.	0.50	$210.00
07/10/26	JCH	Update daily docket report.	0.70	$294.00
07/13/26	JCH	Update master case calendar and timeline (.5); update daily docket report (.5).	1.00	$420.00
07/14/26	JCH	Update daily docket report.	0.50	$210.00
07/15/26	JCH	Update daily docket report.	0.20	$84.00
07/16/26	JCH	Update daily docket report.	0.50	$210.00
07/17/26	JCH	Update daily docket report.	0.50	$210.00
07/20/26	JCH	Update daily docket report.	0.20	$84.00
07/21/26	SJM	Email to Verita regarding notice address for CIGA.	0.20	$185.00
07/22/26	JCH	Update daily docket report.	0.50	$210.00

07/23/26	JCH	Update daily docket report.	0.50	$210.00
07/27/26	JCH	Update daily docket report.	0.50	$210.00
07/28/26	JCH	Update daily docket report.	0.50	$210.00
07/29/26	JCH	Update daily docket report.	0.50	$210.00
07/30/26	JCH	Update daily docket report.	0.50	$210.00
07/31/26	JCH	Calendar hearing and objection deadline regarding Stout second interim fee application (.2); update daily docket report (.5).	0.70	$294.00
		Task Total:	11.20	$4,921.00

007 Chapter 11 Plan/ Plan Confirmation

07/01/26	AMUE	Communications with Foley team regarding submission of exhibits following trial (.6); analyze issue relating to same (.5); debrief notes from trial to analyze strategy relating to trial brief issues (1.0).	2.10	$2,572.50
07/01/26	JT	Preparation of Index of Exhibits Moved Into Evidence by Debtor - Admitted & Not Admitted.	3.20	$1,472.00
07/01/26	MCM	Memo to file regarding case developments and confirmation hearings.	1.00	$1,050.00
07/01/26	MRL	Various email correspondence with the Foley team regarding the exhibits from the confirmation hearing.	0.80	$640.00
07/01/26	NCW	Correspondence with Foley team regarding confirmation hearing transcripts.	0.20	$130.00
07/01/26	NMCG	Revise final list of admitted exhibits to be submitted to the court post-confirmation trial (.5); correspond with J. Torres and S. Moses regarding the same (.2).	0.70	$577.50
07/01/26	SJM	Work on finalizing Debtor's list of admitted exhibits.	1.30	$1,202.50

07/02/26	AMUE	Analyze communication received from C. de Quesada regarding privileged matter (1.0); provide advice to Foley team regarding submission of trial exhibits including internal back and forth relating to the court's request (1.0).	2.00	$2,450.00
07/02/26	JT	Coordinate preparation and delivery of USB drive to Judge Lafferty's chambers.	0.30	$138.00
07/02/26	MCM	Work on issues in connection with confirmation and post-trial briefing expected by the court.	2.00	$2,100.00
07/02/26	MRL	Email correspondence with the Foley team regarding the hearing transcripts.	0.50	$400.00
07/02/26	NCW	Analyze draft confirmation hearing transcripts to ensure accuracy of official confirmation hearing transcripts.	2.10	$1,365.00
07/02/26	NMCG	Attention to final transcripts provided by the court (.1); strategize with Foley team regarding the same (.2).	0.30	$247.50
07/02/26	SJM	Respond to counsel for non-abuse insurance carriers regarding status.	0.30	$277.50
07/03/26	MCM	Analysis of daily transcripts for confirmation hearing in advance of 7/7 status conference on confirmation issues.	1.50	$1,575.00
07/03/26	NCW	Continue analyzing draft confirmation hearing transcripts to ensure accuracy of official confirmation hearing transcripts.	1.20	$780.00
07/05/26	MCM	Prepare for potential oral argument on 7/7 regarding confirmation issues.	1.50	$1,575.00
07/06/26	DBG	Team communications regarding proposal from Committee regarding briefing.	0.20	$290.00
07/06/26	MCM	Prepare for hearing on 7/7 regarding post-trial briefing and related issues.	0.80	$840.00
07/06/26	MDL	Analyze evidentiary questions and disputes from trial, their resolution or open status, and possibility of addressing same at 7/7 hearing.	0.60	$600.00
07/06/26	MRL	Correspondence with the Foley team regarding the transcripts for the confirmation hearing.	0.50	$400.00
07/06/26	MRL	Confer with N. McGuffey regarding the transcripts for the confirmation hearing.	0.20	$160.00

07/06/26	MRL	Email correspondence with the client regarding privileged issue.	0.20	$160.00
07/06/26	NCW	Continue analyzing draft confirmation hearing transcripts to ensure accuracy of official confirmation hearing transcripts.	2.40	$1,560.00
07/06/26	NMCG	Correspond with N. Walsh regarding official transcript check (.2); analyze official transcripts and summaries of differences (2.8); compile list of potential corrections to official transcripts (1.3); correspond with Foley team regarding the same (.2).	4.50	$3,712.50
07/07/26	AMUE	Communications with Foley team regarding post-trial brief (.8); meeting with Lowenstein team and follow-up call with M. Kaplan regarding same (.6); meeting with insurers and Lowenstein regarding same (.5); prepare for post-trial hearing (.6).	2.50	$3,062.50
07/07/26	MDL	Strategize with Foley team regarding post-trial briefing.	0.80	$800.00
07/07/26	MRL	Email correspondence with the Foley team regarding preparations for the hearing.	0.50	$400.00
07/07/26	MRL	Begin drafting the outline for the Debtor's post-trial brief.	0.50	$400.00
07/07/26	NMCG	Call with A. Uetz regarding upcoming status hearing and post-trial matters (.3); correspondence with Committee and insurers' counsel regarding the same (.2); attend meeting with Committee and insurer counsel regarding post-trial briefing schedule and form (.5); follow-up correspondence with Foley team regarding status from call (.1).	1.10	$907.50
07/07/26	SJM	Prepare detailed notes from status conference on post-trial briefing.	0.40	$370.00
07/07/26	SJM	Call with Committee regarding post-trial briefing (.3); call with insurers regarding same (.3).	0.60	$555.00
07/08/26	AMUE	Provide advice relating to post-trial submission of exhibits (.5); analyze issues relating to post-trial brief (1.0).	1.50	$1,837.50
07/08/26	JCH	Attention to post-trial brief and reply brief.	0.30	$126.00

07/08/26	MCM	Begin detailed outline of post-trial brief in connection with confirmation of the Debtor's modified fourth amended plan following status conference on 7.7.26, including review of hearing notes and transcripts of prior proceedings.	2.00	$2,100.00
07/08/26	MRL	Continue drafting the outline for the Debtor's post-trial brief.	2.80	$2,240.00
07/08/26	MRL	Review email correspondence regarding letter to the insurers.	0.20	$160.00
07/08/26	MRL	Email correspondence with the Foley team regarding hearing transcripts.	0.20	$160.00
07/08/26	MRL	Revise the confirmation order based on M. Lee's comments.	0.20	$160.00
07/08/26	MRL	Email correspondence with NERA regarding the confirmation hearing.	0.20	$160.00
07/09/26	AMUE	Provide advice regarding Committee's submission of exhibits.	0.40	$490.00
07/09/26	DBG	Review legal research regarding “fair and equitable standards".	1.00	$1,450.00
07/09/26	MCM	Begin detailed outline of post-trial brief in connection with confirmation of the Debtor's modified fourth amended plan following status conference on 7.7.26, including review of hearing notes and transcripts of prior proceedings (2.5); review of pretrial briefs of various parties to identify outstanding objections or objections that were not actually argued or supported at trial (1.4).	3.90	$4,095.00
07/09/26	MRL	Analyze certain confirmation hearing transcripts to confirm their accuracy.	1.60	$1,280.00
07/09/26	MRL	Draft a summary of the Tuesday hearing for the client.	0.80	$640.00
07/10/26	DBG	Communications with M. Kemner regarding confirmation brief issues and summarize same for group (.5); review legal research regarding judicial notice questions regarding confirmation brief (.4); review legal research regarding fair and equitable questions (2.5).	3.40	$4,930.00

07/10/26	MCM	Work on post-trial brief issues, including collection of evidence, summaries of testimony, and legal analysis of various issues.	2.40	$2,520.00
07/10/26	MDL	Strategize with Foley team regarding exhibit admission list.	0.10	$100.00
07/10/26	MRL	Email correspondence with the Committee's counsel regarding the confirmation hearing exhibits.	0.20	$160.00
07/10/26	MRL	Continue analyzing certain confirmation hearing transcripts to confirm their accuracy.	3.00	$2,400.00
07/10/26	MRL	Continue drafting a summary of the Tuesday hearing for the client (.5); draft an email to A. Uetz regarding the summary (.3).	0.80	$640.00
07/10/26	MRL	Correspondence with M. Moore regarding the post-trial confirmation hearing.	0.20	$160.00
07/10/26	NMCG	Correspond with Committee counsel and Foley team regarding admitted exhibits.	0.20	$165.00
07/10/26	NMCG	Analyze official confirmation trial transcripts in connection with misidentified speakers.	3.50	$2,887.50
07/11/26	MCM	Analysis of confirmation hearing transcripts.	1.50	$1,575.00
07/11/26	MRL	Continue analyzing certain confirmation hearing transcripts to confirm their accuracy.	0.30	$240.00
07/11/26	NMCG	Analyze official confirmation trial transcripts in connection with misidentified speakers.	5.10	$4,207.50
07/12/26	DBG	Review legal research regarding fair and equitable issues regarding plan confirmation.	2.50	$3,625.00
07/12/26	MCM	Draft outline for post-trial brief following receipt of transcripts and exhibit lists in connection with confirmation hearings.	2.00	$2,100.00
07/12/26	MRL	Continue analyzing certain confirmation hearing transcripts to confirm their accuracy.	1.00	$800.00
07/13/26	AMUE	Communication with N. McGuffey regarding trial transcript issues and review of same with Lowenstein.	0.50	$612.50
07/13/26	AMUE	Analyze closing brief issues and communication with M. Moore regarding brief.	1.00	$1,225.00

07/13/26	MCM	Revisions to detailed outline for post-trial brief following confirmation hearings and 7/7 status conference.	2.50	$2,625.00
07/13/26	MRL	Correspondence with the Foley team regarding research on cramdown issues.	0.20	$160.00
07/13/26	MRL	Continue drafting the outline for the post-trial brief.	0.40	$320.00
07/13/26	MRL	Finalize analyzing certain confirmation hearing transcripts to confirm their accuracy.	0.50	$400.00
07/13/26	NMCG	Analyze official confirmation trial transcripts in connection with misidentified speakers (4.9); correspond with Committee counsel regarding the same (.1).	5.00	$4,125.00
07/14/26	AMUE	Communications with N. McGuffey regarding transcript issues.	0.70	$857.50
07/14/26	AMUE	Communications with N. McGuffey regarding privileged memorandum.	0.40	$490.00
07/14/26	MCM	Meeting with N. McGuffey and M. Rofaeil regarding post-trial brief (1.1); legal research of confirmation issues following confirmation hearings (1.2); review transcript of 7/7 status conference (.7); work on draft brief evidence summaries and transcript citations in connection with same (2.3).	5.30	$5,565.00
07/14/26	MDL	Begin reviewing transcript from 7/7 hearing to identify issues for post-trial briefing.	0.20	$200.00
07/14/26	MRL	Email correspondence with the Foley team regarding the status of the case.	0.50	$400.00
07/14/26	MRL	Correspondence with A. Uetz regarding drafting email to the client.	0.10	$80.00
07/14/26	MRL	Draft an email to the client regarding the hearing held last week.	0.70	$560.00
07/14/26	MRL	Correspondence with N. McGuffey regarding revisions to the outline for the post-trial brief.	0.30	$240.00
07/14/26	MRL	Research specific issues for the post-trial confirmation brief.	1.10	$880.00
07/14/26	MRL	Correspondence with the Committee's counsel regarding the confirmation hearing transcripts.	0.40	$320.00

07/14/26	MRL	Revise the outline for the post-trial confirmation brief to conform to M. Moore's comments.	2.50	$2,000.00
07/14/26	MRL	Call with N. McGuffey and M. Moore regarding the outline for the confirmation brief (1.1); prepare for same (.2).	1.30	$1,040.00
07/14/26	NCW	Review case law regarding issues related to confirmation and correspondence with Foley team regarding the same.	0.70	$455.00
07/14/26	NMCG	Call with Committee counsel regarding confirmation trial transcript issues (.2); initial review of proposed corrections to official transcripts identified by Committee counsel (.2); correspondence with Foley team regarding the same (.1).	0.50	$412.50
07/14/26	NMCG	Call with M. Moore and M. Rofaeil regarding post-trial brief outline and strategize research regarding the same (1.1); work on post-trial brief outline and related research (4.7).	5.80	$4,785.00
07/15/26	AMUE	Analyze certain issues requiring research for closing brief (.8) and communication with T. Dolcourt regarding same (.2).	1.00	$1,225.00
07/15/26	AMUE	Prepare for (.6) and participate in (1.3) meeting with Foley team regarding closing brief.	1.90	$2,327.50
07/15/26	DBG	Team telephone conference regarding post-hearing brief (1.3); suggest edits regarding M. Moore outline regarding confirmation (1.1).	2.40	$3,480.00
07/15/26	ERR	Review strategy and input for post-confirmation trial briefing with specific attention to insurance and First Amendment issues.	1.00	$1,250.00
07/15/26	ERR	Review draft outline of post-confirmation trial brief.	1.00	$1,250.00
07/15/26	JDOR	Compile legislative history regarding 11 U.S.C. § 1129.	2.00	$600.00
07/15/26	MCM	Continue working on draft post-trial brief outline in advance of team meeting regarding same (2.0); prepare for and participate in meeting with Foley team to discuss outline and brief structure (partial) (1.2); revise brief outline following same (.8).	4.00	$4,200.00

07/15/26	MDL	Strategize with Foley team regarding post-trial briefing.	1.40	$1,400.00
07/15/26	MDL	Continue analyzing 7/7 hearing transcript to inform post-trial briefing focus.	0.60	$600.00
07/15/26	MDL	Evaluate thematic messages for post-trial briefing.	0.40	$400.00
07/15/26	MRL	Call with the Foley team regarding the outline for the post-trial confirmation brief (1.2); follow up on same (.3).	1.50	$1,200.00
07/15/26	MRL	Research issues regarding the U.S. Trustee fees post effective date for the post-trial brief.	0.90	$720.00
07/15/26	MRL	Email correspondence with A. Uetz regarding the summaries of the confirmation hearing days.	0.40	$320.00
07/15/26	MRL	Continue drafting the outline for the post-trial brief to conform to M. Moore's comments.	1.60	$1,280.00
07/15/26	MRL	Email correspondence with N. McGuffey regarding the experts for the confirmation trial.	0.20	$160.00
07/15/26	NMCG	Review proposed corrections by Committee counsel (.5); correspond with S. Moses and Committee counsel regarding the same (.2).	0.70	$577.50
07/15/26	NMCG	Research case law in connection with post-trial briefing.	3.60	$2,970.00
07/15/26	NMCG	Team call regarding post-trial briefing and other privileged matters (partial).	1.00	$825.00
07/15/26	SJM	Analyze arguments for post-trial briefing in preparation for call regarding same (2.6); participate in call on post-trial briefing (1.3).	3.90	$3,607.50
07/16/26	AMUE	Communication with N. McGuffey regarding transcript issues (.3) and analyze same (.3).	0.60	$735.00
07/16/26	JCH	Prepare draft of Debtor's post-trial brief including incorporation of extensive outline of brief into form of previously filed confirmation brief (2.0); prepare draft joint notice of errata regarding transcripts of confirmation trial (.8).	2.80	$1,176.00

07/16/26	JDOR	Verify multiple citations regarding statements made by Sen. DeConcini and Rep. Edwards regarding Bankruptcy Reform Act (.7); follow-up legislative history analysis regarding congressional records and the Bankruptcy Reform Act of 1978 (.6).	1.30	$390.00
07/16/26	MCM	Continue working on detailed draft of post-trial brief outline and factual support for each element necessary for confirmation.	2.20	$2,310.00
07/16/26	MRL	Correspondence with J. Harrison regarding drafting the post-trial brief.	0.10	$80.00
07/16/26	MRL	Review email correspondence from the Committee regarding the confirmation hearing transcripts.	0.30	$240.00
07/16/26	MRL	Continue drafting the outline for the post-trial brief to conform to M. Moore's comments.	0.60	$480.00
07/16/26	MRL	Begin drafting the Debtor's post-trial brief.	0.60	$480.00
07/16/26	NMCG	Continue researching relevant case law in connection with post-trial confirmation brief.	1.20	$990.00
07/16/26	NMCG	Analyze transcript corrections proposed by the Committee (.7); correspond with Committee counsel regarding the same (.2).	0.90	$742.50
07/17/26	DBG	Review legal research regarding issues for post-hearing brief.	2.00	$2,900.00
07/17/26	JCH	Extensive work on combining Committee errata sheet with Debtor's errata sheet related to transcripts of confirmation trial transcripts, including adding text from transcripts to Debtor's description to conform with Committee's entries.	3.50	$1,470.00
07/17/26	JDOR	Identify and retrieve all the congressional records and comments made by DeConcini and Edwards regarding Bankruptcy Reform Act.	1.80	$540.00
07/17/26	MCM	Continue working on post-trial brief, including legal analysis of various issues.	2.00	$2,100.00
07/17/26	MRL	Review email correspondence from the Committee regarding the confirmation hearing transcripts.	0.20	$160.00
07/17/26	MRL	Continue drafting the Debtor's post-trial brief.	1.30	$1,040.00

07/17/26	NMCG	Continue researching relevant case law in connection with post-trial confirmation brief.	1.50	$1,237.50
07/17/26	NMCG	Continue analyzing corrections to the official transcripts (.3); call with J. Harrison regarding the same and to prepare notice of errata (.2).	0.50	$412.50
07/18/26	DBG	Draft memo of proposed additions for post-confirmation hearing brief (1.5); review legal research regarding same (.5).	2.00	$2,900.00
07/18/26	MCM	Continue working on post-hearing brief, including review of transcripts and exhibit lists.	0.90	$945.00
07/19/26	DBG	Draft memo of proposed additions for post-confirmation hearing brief (2.0); review legal research regarding same (.5).	2.50	$3,625.00
07/19/26	MCM	Continue working on limited procedural and factual background for post-hearing brief.	1.50	$1,575.00
07/20/26	AMUE	Communication with M. Moore and team regarding closing brief (.2); analyze privileged issue relating to closing brief (1.3).	1.50	$1,837.50
07/20/26	AMUE	Communication with N. McGuffey regarding trial transcript issue and provide direction regarding same.	0.50	$612.50
07/20/26	DBG	Prepare memo of issues/research to add to post-confirmation brief (5.5); brief conference with A. Uetz regarding same (.2).	5.70	$8,265.00
07/20/26	JCH	Finalize joint errata sheet regarding transcripts of confirmation trial transcripts.	2.00	$840.00
07/20/26	JDOR	Identify legislation enacted from 1933-1935 that impacted 11 U.S.C. § 1129.	1.00	$300.00
07/20/26	MCM	Draft post-trial brief based on agreed-upon outline and legal arguments.	6.00	$6,300.00
07/20/26	MRL	Review email correspondence from the Committee regarding the transcripts for the confirmation hearing.	0.20	$160.00
07/20/26	MRL	Continue drafting the Debtor's post-trial brief to conform to M. Moore's comments.	1.30	$1,040.00
07/20/26	NMCG	Analyze joint notice of errata for official confirmation transcripts (.5); correspond with Committee counsel regarding the same (.1).	0.60	$495.00

07/20/26	NMCG	Continue researching case law in connection with post-confirmation trial brief.	3.60	$2,970.00
07/20/26	SJM	Review draft notice of errata and errata sheets for trial transcripts.	0.80	$740.00
07/21/26	AMUE	Analyze privileged issues relating to closing brief.	2.40	$2,940.00
07/21/26	DBG	Continued drafting of memorandum summarizing key witness testimony and legal issues regarding confirmation.	3.00	$4,350.00
07/21/26	MCM	Continue revising post-trial brief in advance of 7/31 internal deadline for getting draft to clients.	5.50	$5,775.00
07/21/26	MRL	Continue drafting the Debtor's post-trial brief to conform to M. Moore's comments.	1.70	$1,360.00
07/21/26	MRL	Call with M. Moore and N. McGuffey regarding revisions to the post-trial brief.	0.60	$480.00
07/21/26	MRL	Confer with M. Moore regarding the post-trial brief.	0.20	$160.00
07/21/26	NMCG	Meeting with M. Moore and M. Rofaeil regarding the post-trial confirmation brief (.7); call with S. Moses regarding the same (.2); continue researching case law for post-trial confirmation brief (1.3); correspondence with Foley trial team regarding analysis for the post-trial brief (.4).	2.60	$2,145.00
07/21/26	SJM	Call with N. McGuffey regarding post-trial brief.	0.20	$185.00
07/21/26	SJM	Review Committee comments to errata sheets for transcripts.	0.20	$185.00
07/21/26	SJM	Begin review of Hilco testimony for inclusion in brief.	1.40	$1,295.00
07/21/26	TND	Telephone call and emails with N. McGuffey regarding research issues for brief.	0.20	$176.00
07/22/26	AMUE	Approve transcript revisions to go to Committee.	0.50	$612.50
07/22/26	AMUE	Review transcripts in relation to closing brief.	2.80	$3,430.00
07/22/26	AMUE	Work on closing brief.	2.00	$2,450.00
07/22/26	DBG	Continued preparation of outline of additional facts/legal authority to support post-hearing brief (7.0); review legal authority regarding same (2.0).	9.00	$13,050.00

07/22/26	JCH	Save revised versions of joint notice of errata and notice of errata charts (.2); finalize joint notice of errata and exhibits for filing (.5); file joint notice of errata (.2).	0.90	$378.00
07/22/26	JDOR	Obtain a copy of the Congressional Record and floor debates regarding HR 5884 (Public No. 73-296) and HR 14359 (Public No. 420) per N. McGuffey's request.	2.00	$600.00
07/22/26	MCM	Analyze potential next steps in confirmation process or outside discussions (1.0); continue working on post-trial brief (2.7).	3.70	$3,885.00
07/22/26	MDL	Strategize regarding response to U.S. Trustee objection to plan.	0.20	$200.00
07/22/26	MRL	Review email correspondence regarding the transcripts from the confirmation hearing.	0.20	$160.00
07/22/26	MRL	Email correspondence with the NERA team regarding the Debtor's post-trial brief.	0.20	$160.00
07/22/26	MRL	Continue drafting the Debtor's post-trial brief to conform to M. Moore's comments.	1.60	$1,280.00
07/22/26	NMCG	Correspond with Committee counsel regarding official transcript (.1); finalize joint notice of errata to be filed (.1).	0.20	$165.00
07/22/26	NMCG	Correspondence with Foley team to discuss post-trial brief case law research.	0.50	$412.50
07/22/26	SJM	Work on discussion of Hilco testimony for post-trial brief.	2.30	$2,127.50
07/22/26	SJM	Attention to finalizing errata to transcripts, including communications with Committee and court regarding same.	0.60	$555.00
07/22/26	TND	Review materials from N. McGuffey (.1); call with N. McGuffey (.2).	0.30	$264.00
07/23/26	AMUE	Review correspondence received from T. Evanston and reply thereto regarding proposed plan modifications.	0.60	$735.00
07/23/26	AMUE	Review research regarding privileged issue relating to closing brief.	1.50	$1,837.50

07/23/26	DBG	Prepare outline of additional legal/factual proof to support post-hearing brief and review legal authority regarding same.	3.50	$5,075.00
07/23/26	JDOR	Obtain the final Congressional Record documents and floor debates regarding Public No. 296, 420, and 381 per N. McGuffey's request.	2.00	$600.00
07/23/26	MCM	Continued revisions to draft post-trial brief based on review of transcripts, exhibit lists, and analysis of legal issues.	4.70	$4,935.00
07/23/26	MDL	Begin to analyze insurers' redline of plan.	1.90	$1,900.00
07/23/26	MDL	Email exchange with insurers regarding redline of plan.	0.10	$100.00
07/23/26	MDL	Strategize with A. Uetz regarding additional plan negotiations.	0.70	$700.00
07/23/26	MRL	Correspondence with M. Moore regarding the Debtor's post-trial brief.	0.20	$160.00
07/23/26	MRL	Review email correspondence regarding revisions to the plan.	0.20	$160.00
07/23/26	NMCG	Various correspondence regarding research and edits for post-trial confirmation brief with M. Moore (.2); continue reviewing case law regarding the same (.3).	0.50	$412.50
07/23/26	SJM	Email to E. Mazzocco regarding insurance bad faith issues.	0.40	$370.00
07/24/26	AMUE	Work on analysis of privileged issues relating to closing brief.	2.50	$3,062.50
07/24/26	DBG	Complete and circulate to Foley team outline of additional facts/legal authority to support post-hearing brief.	5.90	$8,555.00
07/24/26	MCM	Continued revisions to draft post-trial brief based on review of transcripts, exhibit lists, and analysis of legal issues (3.3); email and telephone communications with M. Lee regarding brief status and next steps (.4); email correspondence regarding same (.3); analysis of absolute priority rule and interplay with 1129 in non-profit scenario (1.5).	5.50	$5,775.00

07/24/26	MDL	Continue analyzing insurers' proposed changes to plan.	0.30	$300.00
07/24/26	MDL	Strategize with M. Moore regarding fair and equitable and absolute priority rule arguments for post-trial brief.	0.40	$400.00
07/24/26	MRL	Continue drafting the Debtor's post-trial brief to conform to M. Moore's comments.	0.90	$720.00
07/25/26	MCM	Continued revisions of post-trial brief (2.0); analysis of legal research pertaining to counsel statements as admissions and similar with respect to filings (.8); work on chart for appendix of counsel concessions regarding value of insurance policies (.5).	3.30	$3,465.00
07/25/26	MRL	Continue drafting the Debtor's post-trial brief to conform to M. Moore's comments.	0.30	$240.00
07/25/26	MRL	Analyze the child protocols in the San Francisco bankruptcy case to provide an update to the client.	1.10	$880.00
07/25/26	NMCG	Continue working on the post-trial confirmation brief, including research-relevant case law and citations to the official record.	8.00	$6,600.00
07/26/26	MCM	Further revisions to post-trial brief (1.5); email correspondence with Foley team disseminating draft and identifying workstreams (.4).	1.90	$1,995.00
07/26/26	MRL	Continue drafting the Debtor's post-trial brief to conform to M. Moore's comments.	2.30	$1,840.00
07/26/26	MRL	Confer with M. Moore regarding revisions to the post-trial brief.	0.20	$160.00
07/26/26	NMCG	Continue working on post-trial confirmation brief.	3.90	$3,217.50
07/27/26	AMUE	Communications with D. Goroff regarding closing brief and review of same.	1.50	$1,837.50
07/27/26	DBG	Revise the Debtor’s post-hearing brief.	8.90	$12,905.00
07/27/26	MCM	Additional revisions to draft post-trial brief and analysis of suggestions/comments provided by other parties (3.0); internal conference call regarding same to walk through comments (1.1); analysis of legal standards based on feedback (.9).	5.00	$5,250.00

07/27/26	MRL	Analyze the San Francisco bankruptcy case regarding the opt-out motion (.6); email correspondence with A. Uetz regarding the same (.3).	0.90	$720.00
07/27/26	MRL	Analyze the child protocols in the San Francisco bankruptcy case to provide an update to the client.	0.50	$400.00
07/27/26	MRL	Continue revising the Debtor's post-trial brief to conform to M. Moore's comments.	0.50	$400.00
07/27/26	MRL	Call with M. Moore and N. McGuffey regarding revisions to the Debtor's post-trial brief.	1.20	$960.00
07/27/26	NMCG	Meeting with M. Moore and M. Rofaeil regarding post-confirmation brief.	1.10	$907.50
07/27/26	SJM	Work on revisions to post-trial brief.	2.40	$2,220.00
07/28/26	AMUE	Work on issues relating to closing brief.	2.00	$2,450.00
07/28/26	MCM	Internal conference call for page turn of draft post-trial brief and discussion of related issues (1.6); continued revisions to post-trial brief following same and prior to dissemination to client groups (1.4); internal email correspondence regarding same (.3).	3.30	$3,465.00
07/28/26	MRL	Draft the appendix in support of the post-trial brief.	0.50	$400.00
07/28/26	MRL	Call with M. Moore and N. McGuffey regarding revisions to the post-trial brief.	1.60	$1,280.00
07/28/26	MRL	Continue revising the Debtor's post-trial brief to conform to D. Goroff's comments.	3.00	$2,400.00
07/28/26	NMCG	Continue revising post-trial brief with M. Rofaeil and M. Moore.	1.70	$1,402.50
07/28/26	SJM	Work on revisions to post-trial brief based on witness testimony.	6.50	$6,012.50
07/29/26	AMUE	Meeting with M. Moore, N. McGuffey and M. Rofaeil regarding closing brief strategy (1.5); work on brief (2.0).	3.50	$4,287.50
07/29/26	JCH	Revisions to Debtor's post-trial brief and add table of contents.	0.50	$210.00

07/29/26	MCM	Additional revisions to post-trial brief (.4); conference call with Foley team regarding brief and next steps in connection with same (1.5); continue working on brief following discussion in advance of next turn of document (.9); email correspondence regarding legal analysis (.4).	3.20	$3,360.00
07/29/26	MRL	Continue drafting the appendix in support of the post-trial brief.	0.40	$320.00
07/29/26	MRL	Meeting with A. Uetz, M. Moore, and N. McGuffey regarding revisions to the post-trial brief (1.5); follow up on tasks from same (.3).	1.80	$1,440.00
07/29/26	MRL	Continue revising the Debtor's post-trial brief to conform to M. Moore's comments.	2.00	$1,600.00
07/29/26	MRL	Email correspondence with the Foley team regarding the status of the post-trial brief.	0.20	$160.00
07/29/26	NMCG	Call with M. Moore, A. Uetz, and M. Rofaeil regarding post-trial brief (1.5); continue working on post-trial brief (2.2).	3.70	$3,052.50
07/29/26	SJM	Work on revisions to post-trial brief regarding witness testimony.	2.30	$2,127.50
07/30/26	AMUE	Analyze privileged issue relating to closing brief (1.4); review brief and provide revisions to same (2.0).	3.40	$4,165.00
07/30/26	DBG	Revise post-trial brief and review factual and legal authority regarding same (8.4); communications with A. Uetz regarding next steps (.2); communications with N. McGuffey regarding edits (.2).	8.80	$12,760.00
07/30/26	MCM	Further revisions to post-trial brief (2.0); work on incorporation of additional comments and revisions to arguments (1.0); email correspondence regarding brief issues and analysis of legal arguments (1.1).	4.10	$4,305.00
07/30/26	MRL	Confer with D. Goroff regarding revisions to the post-trial brief.	0.10	$80.00
07/30/26	MRL	Continue revising the Debtor's post-trial brief to conform to M. Moore's and A. Uetz's comments.	3.10	$2,480.00
07/30/26	MRL	Confer with A. Uetz regarding revisions to the post-trial brief.	0.20	$160.00

07/30/26	MRL	Email correspondence with the Foley team regarding the post-trial brief.	0.30	$240.00
07/30/26	MRL	Correspondence with M. Moore regarding the insurance portions of the post-trial brief.	0.30	$240.00
07/30/26	NMCG	Continue drafting the post-trial brief (2.0); call with T. Dolcourt regarding the case law and research (.4).	2.40	$1,980.00
07/30/26	SJM	Outline revisions to post-trial brief to address insurance assignment issues.	0.80	$740.00
07/30/26	SJM	Review insurance sections of post-trial brief to evaluate changes needed (.7); call with M. Rofaeil and M. Moore regarding same (.4).	1.10	$1,017.50
07/30/26	TND	Call with N. McGuffey regarding research status (.4); further research on legislative history and secondary sources for post-trial brief (2.7).	3.10	$2,728.00
07/31/26	AMUE	Communications with M. Moore regarding closing brief and communication of same to client leadership.	0.80	$980.00
07/31/26	MCM	Continue revisions to draft post-trial brief prior to dissemination of same (3.0); strategize with Foley team regarding same (.5); email correspondence with client parties transmitting draft brief (.4).	3.90	$4,095.00
07/31/26	MRL	Correspondence with A. Uetz regarding revisions to the post-trial brief.	0.20	$160.00
07/31/26	MRL	Continue revising the Debtor's post-trial brief to conform to M. Moore's and D. Goroff's comments.	3.80	$3,040.00
07/31/26	NMCG	Continue working on post-confirmation brief.	3.50	$2,887.50
07/31/26	SJM	Work on revisions to post-trial brief.	2.60	$2,405.00
07/31/26	TND	Further research on various matters for post-trial brief (1.7); confer with N. McGuffey on status (.3).	2.00	$1,760.00
		Task Total:	392.20	$389,178.00

008 Communications with Client

07/03/26	MCM	Review email and other correspondence with client parties regarding case matters.	0.50	$525.00
07/06/26	AMUE	Communications with P. Bongiovanni regarding privileged matter (.3); communication with J. Satter regarding same (.3).	0.60	$735.00
07/06/26	AMUE	Work on privileged client communication relating to trial.	0.50	$612.50
07/07/26	AMUE	Communications with A. Bardos and J. Pluto regarding cash management.	0.50	$612.50
07/10/26	AMUE	Review inbound communication regarding real estate and communication with S. Moses regarding same.	0.40	$490.00
07/10/26	AMUE	Review update regarding communication with M. Kemner regarding privileged issue relating to closing brief.	0.60	$735.00
07/10/26	MCM	Email correspondence with client parties regarding go-forward and updated financial projections.	0.30	$315.00
07/14/26	AMUE	Finalize memorandum to client regarding privileged issue.	0.80	$980.00
07/14/26	MCM	Review email correspondence with client parties regarding case issues.	0.70	$735.00
07/15/26	AMUE	Communication with client finance team regarding cash forecast.	0.30	$367.50
07/16/26	MCM	Conference call with client parties regarding financial forecasts and go-forward projections.	0.70	$735.00
07/27/26	AMUE	Communications with leadership regarding cash forecast issues.	0.50	$612.50
07/28/26	MDL	Email exchange with P. Bongiovanni and A. Bardos regarding Livermore approval of development agreement.	0.20	$200.00
07/31/26	AMUE	Communication with M. Kemner regarding privileged issue.	0.30	$367.50
		Task Total:	6.90	$8,022.50

011 Cash Management

07/03/26	SJM	Prepare email notice of transfer of funds for CCCEB expense payment.	0.60	$555.00
07/06/26	SJM	Work on estimates for professional fees through case exit.	0.60	$555.00
07/07/26	AMUE	Analyze cash issues post-trial (.5) and communications with Foley team regarding same (.4).	0.90	$1,102.50
07/08/26	SJM	Follow up with professionals regarding May and June fees for budgeting purposes.	0.30	$277.50
07/10/26	AMUE	Communications with Foley team and with client regarding cash forecast, and analyze same.	1.00	$1,225.00
07/13/26	SJM	Send notice of church bank account openings and closings.	0.40	$370.00
07/15/26	AMUE	Analyze certain estimates for cash forecast.	0.80	$980.00
07/16/26	AMUE	Prepare for (.4) and meet with finance team regarding cash forecast (.4); communication with Lowenstein regarding fee estimates (.2).	1.00	$1,225.00
07/16/26	TND	Call with client team, Foley, and VeraCruz on professional fee budgeting.	0.50	$440.00
07/17/26	AMUE	Analyze cash management issue.	0.80	$980.00
07/23/26	AMUE	Communication with J. Prol regarding attorney fees (.2); communication with D. Flanagan regarding cash forecast (.3) and analyze same (.3).	0.80	$980.00
07/23/26	SJM	Prepare notice of CCCEB funding request.	0.70	$647.50
		Task Total:	8.40	$9,337.50

016 General Case Strategy (includes team calls)

07/06/26	AMUE	Provide advice regarding insurance settlement issue (.7); communications with E. Ridley relating to state court mediation (.5) and provide advice regarding same (.3).	1.50	$1,837.50
07/06/26	MCM	Internal email correspondence regarding case issues and hearing on briefing scheduled for 7/7.	1.00	$1,050.00

07/06/26	MDL	Evaluate potential impact of announced but not documented archdiocesan settlement on plan confirmation analysis.	0.60	$600.00
07/06/26	MDL	Evaluate different points of objection by Committee to chapter 11 plan and potential responses to same.	1.40	$1,400.00
07/06/26	MDL	Strategize regarding alternative resolutions to plan confirmation fight.	0.40	$400.00
07/06/26	MRL	Review pending dioceses cases to provide an update on their status to client.	1.80	$1,440.00
07/06/26	MRL	Email correspondence with A. Uetz regarding summarizing daily docket activity and upcoming deadlines for client.	0.20	$160.00
07/07/26	MRL	Call with the Foley team to discuss the outcome of the status conference hearing.	0.80	$640.00
07/07/26	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to client.	1.20	$960.00
07/07/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	1.20	$960.00
07/07/26	NMCG	Call with Foley team to strategize next steps regarding post-trial briefing and other privileged matters.	0.80	$660.00
07/07/26	SJM	Team meeting regarding post-trial briefing following status conference.	0.90	$832.50
07/08/26	ERR	Prepare for mediation between insurers and plaintiff, including letters to Westbrook, CNA and Travelers regarding reservations and settlement.	4.00	$5,000.00
07/08/26	MCM	Internal email correspondence with Foley team regarding case issues.	0.50	$525.00
07/08/26	MCM	Email correspondence with Foley team and client parties regarding potential settlement in state court lawsuits.	0.50	$525.00
07/08/26	NMCG	Correspond with Committee counsel regarding official transcript errors (.2); correspond with Foley team regarding the same (.2).	0.40	$330.00
07/09/26	AMUE	Analyze issues relating to settlement strategy.	0.80	$980.00

07/09/26	AMUE	Analyze issue relating to state court mediation (.5) and review communications relating to progress of same (.7).	1.20	$1,470.00
07/09/26	AMUE	Meeting with P. Pascuzzi relating to case strategy.	0.90	$1,102.50
07/09/26	NMCG	Correspondence with Committee counsel regarding official transcript issues (.2); correspond with M. Rofaeil regarding the same (.2).	0.40	$330.00
07/10/26	JRBL	Analysis of coverage issues related to settlement.	2.20	$3,465.00
07/13/26	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.80	$640.00
07/13/26	MRL	Review pending dioceses cases to provide an update on their status to client.	1.50	$1,200.00
07/15/26	AMUE	Draft memorandum to Foley team regarding privileged issue concerning settlement.	0.50	$612.50
07/15/26	NMCG	Email correspondence with internal Foley team and client regarding post-trial briefing.	0.20	$165.00
07/16/26	AMUE	Analyze settlement issues (.7) and meeting with M. Lee and M. Moore regarding same (.6).	1.30	$1,592.50
07/16/26	MCM	Conference call with M. Lee and A. Uetz regarding case issues (.5); follow up on tasks from same (.2).	0.70	$735.00
07/16/26	MDL	Strategize with A. Uetz and M. Moore regarding options for resuming settlement negotiations.	0.50	$500.00
07/17/26	AMUE	Analyze settlement issue and communication with state court trial team regarding same.	1.00	$1,225.00
07/17/26	JRBL	Develop settlement strategy.	0.50	$787.50
07/20/26	AROU	Call with and strategize regarding counsel for co-defendants regarding global settlements impacting cases in which RCBO is a co-defendant.	0.50	$500.00
07/20/26	AROU	Analyze case law regarding implications of good faith settlement determination arising from proposed global settlements by co-defendants.	0.80	$800.00

07/20/26	JRDO	Research California authority to determine if a co-defendant enters a good faith settlement, whether the non-settling co-defendant can argue at trial that the settling defendant was responsible for plaintiff's injuries under allocation of fault pursuant to Proposition 51.	2.00	$1,350.00
07/20/26	MRL	Review pending diocese cases to provide an update on their status to client.	0.60	$480.00
07/21/26	AMUE	Prepare for (.5) and meet with J. Blease and T. Carlucci regarding privileged issue (two meetings/partial attendance by other partners) (1.0).	1.50	$1,837.50
07/21/26	AMUE	Communications with A. Ouellette regarding state court CMC to determine potential impact on chapter 11 case.	0.50	$612.50
07/21/26	JRBL	Develop strategy for settlement.	0.80	$1,260.00
07/21/26	JRBL	Consultation on settlement strategy with A. Uetz and T. Carlucci.	0.50	$787.50
07/21/26	MRL	Analyze San Francisco settlement.	0.30	$240.00
07/21/26	TFCA	Telephone call with A. Uetz regarding settlement strategy (.5); review same with A. Uetz and J. Blease (1.0).	1.50	$2,287.50
07/22/26	MRL	Call with the NERA and Foley teams regarding the San Francisco settlement.	0.30	$240.00
07/26/26	AMUE	Communications with Foley team regarding closing brief and possible settlement issues.	1.00	$1,225.00
07/27/26	AMUE	Analyze San Francisco settlement issue as it relates to Oakland.	0.50	$612.50
07/27/26	JRDO	Continue to research California authority to determine if a co-defendant enters a good faith settlement, whether the non-settling co-defendant can argue at trial that the settling defendant was responsible for Plaintiff's injuries under allocation of fault pursuant to Proposition 51.	0.80	$540.00
07/30/26	AMUE	Meeting with J. Blease and T. Carlucci regarding possible settlement issues.	0.50	$612.50
07/30/26	MCM	Internal email correspondence regarding case issues.	0.50	$525.00

07/30/26	MRL	Call with S. Moses and M. Moore regarding the insurance issues for the post-trial brief.	0.50	$400.00
07/30/26	MRL	Correspondence with A. Uetz regarding the San Francisco bankruptcy case (.2); analyze the docket regarding the same (.2).	0.40	$320.00
07/30/26	TFCA	Telephone call with J. Blease and A. Uetz regarding settlement strategy and follow up.	0.80	$1,220.00
07/31/26	AMUE	Draft privileged memo regarding possible settlement issues.	0.80	$980.00
07/31/26	AMUE	Communication with P. Pascuzzi regarding San Francisco case settlement.	0.50	$612.50
07/31/26	MRL	Analyze article by Bishop Barber to provide an update to the Foley team.	0.40	$320.00
07/31/26	MRL	Confer with A. Uetz regarding article written by Bishop Barber.	0.10	$80.00
07/31/26	MRL	Review email correspondence from the Foley team regarding the San Francisco settlement.	0.20	$160.00
07/31/26	TFCA	Prepare for and attend call on additional case with opposing counsel (1.0); review settlement update email regarding San Francisco settlement (.2); follow-up emails regarding motion regarding "estate neutrality" (.3).	1.50	$2,287.50
		Task Total:	47.50	$52,415.00

017 Hearings and Court Matters

07/07/26	AMUE	Attend post-trial hearing (1.1) and debrief with Foley team (1.0); analyze issues relating to brief (.9).	3.00	$3,675.00
07/07/26	DBG	Participate in status hearing to learn J. Lafferty questions for briefing (1.0); post-hearing team conference regarding next steps with briefing (.8).	1.80	$2,610.00
07/07/26	EPK	Listen to post-trial status conference regarding feedback from Judge Lafferty.	1.00	$1,000.00

07/07/26	MCM	Pre-hearing call with Committee counsel regarding status conference and proposed scheduling for post-trial briefing (.7); prepare for (1.0) and participate in (1.0) 7/7 status conference regarding confirmation issues; debrief with Foley team regarding same (1.0); begin analysis of outline of post-trial brief following status conference (1.0).	4.70	$4,935.00
07/07/26	MDL	Remote-attend but not appear at status conference regarding post-trial briefing.	1.10	$1,100.00
07/07/26	MRL	Attend and take notes on the status conference hearing.	1.10	$880.00
07/07/26	NMCG	Attend status hearing regarding post-trial matters.	1.10	$907.50
07/07/26	SJM	Attend status conference regarding post-trial briefing (1.1); prepare for same (.2).	1.30	$1,202.50
07/08/26	MCM	Prepare for and participate in hearing on cross-motion to allow claim #563.	1.50	$1,575.00
07/28/26	MCM	Prepare for and attend hearing on motion to allow from claimant 563 that morphed into hearing on quasi-motion to allow from claimant 532.	0.80	$840.00
07/29/26	MCM	Prepare for and participate in continued hearing regarding allowance of claim 563 and email debrief following discussion of claim 532 at hearing.	0.80	$840.00
07/29/26	SJM	Prepare for hearing on claimant 563 motion (.5); attend hearing (.8).	1.30	$1,202.50
		Task Total:	19.50	$20,767.50

018 Non-Bankruptcy Litigation

07/01/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	0.80	$800.00
07/03/26	TFCA	Review draft discovery letter template and provide edits regarding same (.3); review updated templates for 6 letters (.2).	0.50	$762.50
07/06/26	DBG	Review briefs and related materials regarding moot court of P. Batalden (3.0); help conduct moot court of P. Batalden (1.5).	4.50	$6,525.00

07/06/26	TFCA	Meet with R. Simons and M. Lee (1.5); follow up with M. Lee regarding same (.5).	2.00	$3,050.00
07/07/26	TFCA	Review draft email regarding discovery in five cases.	0.20	$305.00
07/07/26	TFCA	Respond to numerous emails regarding update on state cases.	0.50	$762.50
07/08/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	0.90	$900.00
07/08/26	TFCA	Work on budget and discuss same with E. Ridley and A. Ouellette.	0.50	$762.50
07/10/26	TFCA	Review budget updates.	0.20	$305.00
07/14/26	TFCA	Review stipulation regarding substitution of case and emails regarding same regarding R. Simons and Westport.	0.40	$610.00
07/15/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	1.10	$1,100.00
07/15/26	TFCA	Review emails with R. Simons regarding case substitution (.2); draft response (.2).	0.40	$610.00
07/16/26	AROU	Strategize regarding JCCP 5108 case management conference statement and agenda items for case management conference.	0.50	$500.00
07/16/26	AROU	Strategize regarding party and liaison counsel briefing on JCCP 5108 motion to compel and negotiated resolution in action involving Diocese of Santa Rosa regarding discovery of third-party perpetrator and survivor information.	0.70	$700.00
07/17/26	TFCA	Review letter to court regarding deselection case management conference statement (.3); draft email to E. Ridley regarding same (.2).	0.50	$762.50
07/20/26	AROU	Prepare for JCCP 5108 case management conference.	1.10	$1,100.00
07/20/26	TFCA	Review and respond to emails regarding objection regarding withdrawal of case.	0.20	$305.00
07/21/26	AROU	Attend JCCP 5108 case management conference.	1.30	$1,300.00

07/21/26	AROU	Strategize regarding takeaways from JCCP 5108 case management conference and further briefing regarding potential substitution of second bellwether case set for trial.	1.40	$1,400.00
07/21/26	AROU	Prepare for JCCP 5108 case management conference.	0.70	$700.00
07/21/26	ERR	Prepare for and attend case management conference before Judge Chatterjee.	1.50	$1,875.00
07/22/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	1.00	$1,000.00
07/22/26	AROU	Analyze court order following JCCP 5108 case management conference.	0.10	$100.00
07/22/26	TFCA	Numerous emails with A. Ouellette and E. Ridley regarding bankruptcy impact regarding trial scheduling and strategy for same.	0.50	$762.50
		Task Total:	21.50	$26,997.50

019 Non-Working Travel

07/13/26	JRDO	Travel to San Francisco from San Diego to attend motion for new state court trial hearing.	2.00	$675.00
07/14/26	JRDO	Travel from San Francisco to San Diego following hearing on motion for new state court trial.	2.00	$675.00
		Task Total:	4.00	$1,350.00

020 Retention/Billing/Fee Applications for Debtor Professionals

07/02/26	TND	Provide updated Foley fee information to client team for financial modeling.	0.10	$88.00
07/06/26	TND	Follow up on estimate of June bills for the budgeting.	0.10	$88.00
07/08/26	TND	Provide updated fee information to S. Moses (.1); emails with I. Velikova on fee information for NERA (.2).	0.30	$264.00
07/13/26	JCH	Prepare certificates of no objection to Foley and NERA May 2026 monthly fee statements.	0.50	$210.00

07/13/26	SJM	Attention to issue regarding Verita monthly fee statement.	0.30	$277.50
07/13/26	TND	Review Verita monthly application for filing (.2); email to Verita regarding same (.1).	0.30	$264.00
07/14/26	JCH	File certificates of no objection to Foley and NERA May 2026 monthly fee statements.	0.20	$84.00
07/14/26	SJM	Review CNOs for Foley and NERA monthly fee statements.	0.20	$185.00
07/14/26	TND	Begin preparation of Foley June fee statement to ensure compliance with U.S. Trustee guidelines (.4); email with A. Estrada of Verita on upcoming billing statement (.1).	0.50	$440.00
07/15/26	TND	Review information needed for next Foley fee statement.	0.20	$176.00
07/16/26	TND	Further preparation of information for Foley June fee statement.	0.30	$264.00
07/18/26	TND	Further preparation of information for Foley June fee statement.	0.50	$440.00
07/22/26	AMUE	Review June time entries.	0.50	$612.50
07/22/26	TND	Further preparation of June fee statement for Foley to ensure compliance with U.S. Trustee guidelines.	1.90	$1,672.00
07/23/26	TND	Further work on June fee statement for Foley to ensure compliance with U.S. Trustee guidelines.	2.70	$2,376.00
07/27/26	TND	Review questions related to Foley June fee statement.	0.30	$264.00
07/28/26	AMUE	Review communications with D. Klauder and communications with S. Moses to resolve same.	0.50	$612.50
07/28/26	TND	Email correspondence with I. Velikova regarding NERA's application (.1); review email from N. Corbett on A&M application (.1).	0.20	$176.00
07/29/26	JCH	Revise NERA June 2026 monthly fee statement to conform with local guidelines (.3); prepare draft of Foley June 2026 monthly fee statement (.5).	0.80	$336.00

07/29/26	TND	Correspondence with S. Moses on A&M fee application (.1); email correspondence with N. Corbett on A&M fee application (.1); review issues for Foley application (.1).	0.30	$264.00
07/30/26	AMUE	Revisions to Foley monthly fee statement.	1.50	$1,837.50
07/30/26	JCH	Finalize Foley June 2026 monthly fee statement (.5); file Foley, A&M and NERA June 2026 monthly fee statements (.2).	0.70	$294.00
07/30/26	TND	Finalize Foley fee statement for June.	1.10	$968.00
		Task Total:	14.00	$12,193.00

022 Retention/Fee Applications: Other Professionals

07/03/26	SJM	Email to client regarding May professional fee statements.	0.60	$555.00
07/15/26	SJM	Email to client regarding payment of monthly fee statements.	0.50	$462.50
07/31/26	JCH	Prepare chart of interim payments due to all case professionals and email same to S. Moses.	0.50	$210.00
07/31/26	SJM	Attention to issues regarding service of Stout fee application.	0.20	$185.00
		Task Total:	1.80	$1,412.50

025 U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating

07/16/26	EPK	Email correspondence with D. Flanagan of VeraCruz regarding preparation of the initial June 2026 MOR package.	0.10	$100.00
07/20/26	EPK	Email correspondence with D. Flanagan of VeraCruz regarding review and approval of the June 2026 MOR package (.2); review draft June 2026 MOR package (.5); email correspondence with A. Bardos regarding approval for filing the report (.2).	0.90	$900.00
07/21/26	EPK	Review Q2 2026 quarterly U.S. Trustee fee calculation and OCP reporting prepared by VeraCruz team.	0.20	$200.00

07/21/26	JCH	File June 2026 monthly operating report and circulate filed copy of same to client group.	0.50	$210.00
		Task Total:	1.70	$1,410.00

026 Unsecured Creditor Issues/Communications/Meetings

07/06/26	AMUE	Communication with M. Kaplan regarding conference to discuss court conference (.4); prepare for court conference (1.0).	1.40	$1,715.00
07/07/26	MRL	Call with the Foley and Committee teams to discuss the post-trial briefs.	0.30	$240.00
07/20/26	AMUE	Communication with J. Prol regarding fees.	0.20	$245.00
07/22/26	AMUE	Communication with J. Prol regarding cash and fees.	0.30	$367.50
07/22/26	AMUE	Communications with M. Kaplan regarding transcript issues.	0.50	$612.50
		Task Total:	2.70	$3,180.00

027 Real Estate and Real Property Issues

07/29/26	AMUE	Review information relating to development agreement with the City of Livermore and possible impact on timing for sale of real estate including communications with finance team.	1.00	$1,225.00
		Task Total:	1.00	$1,225.00

028 Tort Claims

07/02/26	JDOR	Head hunt a potential expert witness in Qualified Medical Examiner in California.	1.00	$300.00
07/02/26	KAFA	Research potential forensic psychology/psychiatry IME candidates for upcoming trials and summarize same for A. Ouellette.	2.90	$1,392.00
07/06/26	KAFA	Review emails regarding letters to opposing counsel requesting informal discovery for the 5 new cases set for trial.	0.30	$144.00

07/07/26	KAFA	Download and review pleadings filed for Jane Doe 105 and Jane Doe 546.	0.30	$144.00
07/17/26	KAFA	Attend to calendaring issues and downloads of newly filed JCCP 5108 documents.	0.50	$240.00
07/21/26	KAFA	Prepare details on claims of Jane Doe OK 1045 and Joseph Doe Oak 489 as requested by A. Ouellette and E. Ridley.	0.80	$384.00
07/23/26	KAFA	Communications with team regarding order on case substitution for upcoming bellwether trials.	0.30	$144.00
07/24/26	KAFA	Review pleadings filed for Jane Doe 105 and Jane Doe 546.	0.40	$192.00
07/28/26	KAFA	Prepare templates for RCBO's responses to fact sheets and initial document demands for multiple alleged perpetrators (.8); coordinate collection of additional client documents from A. Bardos for review and potential production (.4).	1.20	$576.00
07/29/26	KAFA	Order July 21 hearing transcript (.1); communications with D. Flannagan regarding MOR supplemental requests (.1); communications with A. Bardos regarding paper file boxes of Heffernan Insurance documents for scanning (.1).	0.30	$144.00
07/31/26	KAFA	Prepare information requested by A. Ouellette for fact sheet responses for accused parties.	0.40	$192.00
		Task Total:	8.40	$3,852.00

030 Insurance Issues (other than coverage)

07/01/26	SJM	Prepare proposed order approving new insurance premium finance agreement (.6); email to R. Murphy (lender) regarding same (.7).	1.30	$1,202.50
07/01/26	SJM	Supervise N. Walsh regarding preparation of new motion to approve insurance premium financing.	0.70	$647.50
07/05/26	NCW	Draft Debtor's fourth motion for order allowing Debtor to obtain premium financing and related documents.	1.90	$1,235.00
07/06/26	NCW	Continue drafting Debtor's fourth motion for order allowing Debtor to obtain premium financing and related documents.	1.30	$845.00

07/08/26	MCM	Email correspondence with Foley team regarding insurance issues.	0.50	$525.00
07/08/26	SJM	Revise motion for approval of insurance premium finance agreement for new policy year.	1.80	$1,665.00
07/09/26	JCH	File fourth motion to approve insurance premium finance & security agreement, declaration in support and notice of hearing (.3); calendar related objection deadline and hearing on same (.2).	0.50	$210.00
07/09/26	MDL	Revise motion for approval of finance agreement.	0.40	$400.00
07/15/26	SJM	Prepare for hearing on premium finance agreement (.7); attend hearing (.3).	1.00	$925.00
07/15/26	SJM	Finalize order approving premium finance agreement.	0.20	$185.00
07/20/26	SJM	Review entered order on insurance premium finance agreement (.1); email to lender regarding same (.3); email to client regarding same (.2).	0.60	$555.00
		Task Total:	10.20	$8,395.00

031 Insurance Issues (coverage, includes adversary proceeding)

07/01/26	ERR	Finalize letter to Curet regarding drop-down obligations and communicate with Covington regarding same.	1.40	$1,750.00
07/01/26	MR	Attend strategy call with E. Ridley regarding privileged matters in insurance coverage action (.3); email communications with E. Ridley and D. Goodwin regarding same (.4); revise draft letter to Westport regarding drop-down insurance coverage obligations (.4).	1.10	$935.00
07/02/26	TND	Review information from Travelers to determine payment status of vendors (.2); emails with K. Farrar regarding same (.2).	0.40	$352.00
07/03/26	ERR	Edit discovery letter regarding cases being tried under the lift stay order.	0.80	$1,000.00
07/03/26	ERR	Review Travelers letter regarding payment of defense fees/costs and report to client regarding status of insurance claims.	1.00	$1,250.00

07/06/26	ERR	Review letters from Westport and Continental regarding amended reservation of rights in light of mediation.	1.30	$1,625.00
07/06/26	ERR	Review preparation for further confirmation trial proceedings.	0.80	$1,000.00
07/07/26	ERR	Review status of Travelers payment regarding defense fees regarding reimbursement of trial costs.	0.50	$625.00
07/07/26	ERR	Prepare for and attend post-trial hearing regarding briefing and issues to be addressed.	1.50	$1,875.00
07/07/26	ERR	Attend telephone conference with insurers and Committee regarding post-trial briefing.	0.80	$1,000.00
07/07/26	ERR	Review strategy to respond to court's issues to be addressed in post-trial briefing.	0.70	$875.00
07/07/26	MR	Attend strategy call with E. Ridley regarding privileged matters in relation to insurance coverage action (.3); draft response letters to Westport and CNA regarding July 9, 2026 mediation and positions asserted in letters received from Westport and CNA in connection therewith (2.0).	2.30	$1,955.00
07/08/26	ERR	Review issues regarding budget for state cases to go to trial under relief from stay order.	0.50	$625.00
07/08/26	MDL	Strategize with Foley team regarding potential resolution of certain subsets of claims at state court mediation.	0.50	$500.00
07/08/26	MR	Analyze information from pleadings and discovery in furtherance of drafting of omnibus opposition to insurers' motions to dismiss in insurance coverage action (.6); revise draft of letters to Westport and CNA regarding July 9th mediation (.8); telephone call with E. Ridley regarding privileged strategy matters in insurance coverage action (.2); draft letter to Travelers regarding July 9th mediation (.7).	2.30	$1,955.00
07/09/26	ERR	Edit opposition brief to motions to dismiss by insurers and CIGA.	1.00	$1,250.00
07/09/26	MR	Comment on response in opposition to insurers' motions to dismiss sixth amended complaint in insurance coverage action.	0.90	$765.00

07/09/26	TND	Review issues with payments to trial vendor (.3); call with vendor (.1).	0.40	$352.00
07/10/26	AMUE	Communication with Foley team regarding insurance issue relating to state court cases and review of same.	0.80	$980.00
07/10/26	ERR	Review final of opposition to motions to dismiss.	0.50	$625.00
07/10/26	ERR	Review estimated monthly budget regarding trial of state court cases regarding relief from stay.	0.50	$625.00
07/13/26	EPM	Meet with M. Roberts to discuss case status and action items.	0.60	$570.00
07/13/26	MR	Attend strategy meeting with E. Mazzocco regarding privileged discovery matters in insurance coverage action (.6); review letter received from Westport regarding drop-down coverage obligations (.2); perform research per E. Ridley request in furtherance of privileged strategy considerations in insurance coverage action (1.5).	2.30	$1,955.00
07/14/26	EPM	Review status of insurance coverage action (.5); attend meet and confer with Lloyd's regarding written discovery responses (.2); attend meet and confer with Westport regarding written discovery responses (.3); review meet and confer letters regarding written discovery (.5).	1.50	$1,425.00
07/14/26	ERR	Review court order regarding motion to dismiss and case status.	0.50	$625.00
07/14/26	ERR	Edit stipulation regarding cases under relief of stay.	0.50	$625.00
07/14/26	MR	Strategize with E. Mazzocco regarding privileged matters in relation to insurance coverage action.	0.20	$170.00
07/15/26	EPM	Review emails to the client regarding case status and action items (.4); revise insurance case task list in advance of related call (.3); review Westport correspondence regarding coverage for state court cases (.4); attend call with E. Ridley and M. Roberts regarding insurance case status and action items (1.1); review briefing regarding impact of chapter 11 discharge on insurance assignment (.6); begin reviewing insurers' motions to dismiss sixth amended complaint (1.6).	4.40	$4,180.00

07/15/26	ERR	Review status and strategy regarding pending insurance issues in coverage action, plan confirmation proceedings and state court proceedings.	1.00	$1,250.00
07/15/26	MR	Draft task list for outstanding to-do items in insurance coverage action (.2); attend strategy call with E. Ridley and E. Mazzocco regarding privileged matters in insurance coverage action (1.0).	1.20	$1,020.00
07/15/26	SJM	Analyze transcripts and briefing regarding effect on bad faith claims from discharge (2.3); email to E. Mazzocco regarding same (.2).	2.50	$2,312.50
07/17/26	ERR	Review plaintiff's position regarding pending cases under relief from stay order.	0.80	$1,000.00
07/20/26	EPM	Coordinate collection of documents to be reviewed for relevance and privilege.	0.50	$475.00
07/20/26	MR	Draft response letter to Westport regarding refusal to acknowledge drop-down insurance coverage obligation.	0.70	$595.00
07/21/26	MR	Complete initial draft of response letter to Westport regarding refusal to acknowledge drop-down insurance coverage obligation.	0.90	$765.00
07/22/26	AMUE	Review request from insurer counsel for extension to file brief and provide advice regarding same.	0.50	$612.50
07/22/26	SJM	Analyze transcripts regarding estate neutrality expectation from lift stay cases.	1.80	$1,665.00
07/23/26	ERR	Begin review of reply briefs regarding motions to dismiss sixth amended complaint.	1.50	$1,875.00
07/27/26	MR	Summarize various insurers' reply briefs in support of motions to dismiss in insurance coverage action.	1.80	$1,530.00
07/28/26	EPM	Coordinate with client to review potentially relevant files.	0.30	$285.00
07/28/26	ERR	Review issues regarding response to Westport regarding drop-down obligations.	0.70	$875.00
07/28/26	ERR	Review of submittal of Fax Pain case regarding motion to dismiss.	0.50	$625.00

07/28/26	MR	Revise draft response letter to Westport regarding drop-down coverage obligations.	0.80	$680.00
07/29/26	AMUE	Analyze insurance redline to plan.	0.80	$980.00
07/29/26	EPM	Review insurance task list in advance of meeting with M. Roberts to discuss same (.2); meet with M. Roberts to discuss insurance task list (.5).	0.70	$665.00
07/29/26	ERR	Review status of production to insurers and reply briefs regarding motion to dismiss.	1.00	$1,250.00
07/29/26	ERR	Review status of production.	0.50	$625.00
07/29/26	MR	Finalize document production set of communications requested by insurers relating to litigation of state court trial and insurance issues related thereto (1.4); confer with E. Mazzocco regarding privileged discovery-related matters in insurance coverage action (.5); perform additional analysis of insurance policy documents in furtherance of privileged strategy considerations (.4).	2.30	$1,955.00
07/29/26	MRL	Review email correspondence from the Foley team regarding document production to the insurers.	0.20	$160.00
07/30/26	ERR	Review status of document review from RCBO.	0.50	$625.00
07/30/26	MR	Review recent California case law authority bearing on privileged strategy matters for insurance coverage action (1.5); email communications with E. Ridley and E. Mazzocco regarding same (.2).	1.70	$1,445.00
07/31/26	AMUE	Analyze issue relating to state court cases being tried and bankruptcy court's order that lift stay cases be estate-neutral.	0.50	$612.50
07/31/26	ERR	Review demands for informal discovery in state cases subject to relief from stay.	0.70	$875.00
07/31/26	MR	Identify documents to include in supplemental redaction log in insurance coverage action, and draft log entries for same.	1.50	$1,275.00

07/31/26	SJM	Email to case team regarding analysis of need for potential motion to clarify lift stay order regarding estate neutrality of lift stay cases.	0.60	$555.00
		Task Total:	56.50	$58,056.50

032 Rule 2004 Motions/Discovery/Subpoenas

07/30/26	KAFA	Prepare additional MOR supplemental requests documents for production to the Committee (.5); continued communications with A. Bardos and B. Portobanco regarding paper file boxes of Heffernan Insurance documents for scanning (.2); prepare chain of custody form (.3).	1.00	$480.00
07/31/26	KAFA	Finalize additional MOR supplemental requests documents for production to the Committee (.3); communications with M . Lee and D. DiFrancesco regarding same (.2); update document production log (.1).	0.60	$288.00
		Task Total:	1.60	$768.00

039 JCCP 5108 Litigation (Case No. HG19048685) – Claim No. 63

07/01/26	JRBL	Analysis of order vacating trial dates (.2); conference with P. Bongiovanni (1.0).	1.20	$1,890.00
07/02/26	ERR	Review Westport position regarding upcoming mediation.	0.70	$875.00
07/02/26	KAFA	Attend to payment of invoices from trial and Travelers reimbursements.	0.30	$144.00
07/06/26	ERR	Review issues related to Westport mediation of action.	0.70	$875.00
07/06/26	SJM	Prepare detailed analysis of bankruptcy issues raised in insurer letters regarding mediation of judgment.	1.40	$1,295.00
07/07/26	TFCA	Review draft letter responding to insurers regarding state court mediation.	0.30	$457.50
07/09/26	ERR	Attend mediation between insurers and plaintiff.	7.00	$8,750.00

07/09/26	JRBL	Analysis of insurer contentions and communications.	0.80	$1,260.00
07/09/26	MR	Support E. Ridley during mediation with insurers by analyzing pleadings and documents relevant to mediator inquiries.	0.70	$595.00
07/09/26	SJM	Attend mediation with plaintiff and insurers regarding state court judgment (7.0); prepare for same (1.7).	8.70	$8,047.50
07/10/26	ERR	Provide analysis regarding coverage dispute between Travelers and CNA regarding case years (74-77).	1.00	$1,250.00
07/10/26	JRDO	Begin to prepare for hearing on motion for new trial by reviewing all pleadings and planning out arguments to raise at hearing.	0.80	$540.00
07/10/26	TFCA	Review mediation-related emails and insurance coverage follow-up.	0.50	$762.50
07/13/26	AROU	Analyze tentative ruling on motion for new trial and strategize regarding arguments to raise at oral argument.	1.30	$1,300.00
07/13/26	ERR	Review tentative ruling and prepare for hearing on motion for new trial.	1.50	$1,875.00
07/13/26	JRDO	Continue to plan and prepare for motion for new trial hearing by outlining arguments and reviewing pleadings (1.8); strategize with attorney team on same and tentative ruling (.5).	2.30	$1,552.50
07/13/26	TFCA	Review tentative ruling and draft numerous emails regarding same (.5); discussion with E. Ridley regarding need for oral argument (.3); review language regarding request for hearing (.1).	0.90	$1,372.50
07/14/26	AROU	Attend court for hearing on motion for new trial or, in the alternative, conditional remittitur.	2.20	$2,200.00
07/14/26	AROU	Strategize regarding takeaways from hearing on motion for new trial or, in the alternative, conditional remittitur.	0.40	$400.00
07/14/26	AROU	Strategize regarding and prepare for hearing on motion for new trial or, in the alternative, conditional remittitur.	0.80	$800.00

07/14/26	ERR	Review revised stipulation regarding cases under relief from stay order.	0.50	$625.00
07/14/26	JRBL	Analysis of oral argument topics and results.	0.80	$1,260.00
07/14/26	JRDO	Research California authority cited in the court's tentative ruling on motion for new trial in preparation for attending hearing on motion.	1.50	$1,012.50
07/14/26	JRDO	Prepare for hearing on motion for new trial by reviewing motion papers, opposition, reply, supporting declarations, requests for judicial notice, relevant trial transcript excerpts, and court's tentative ruling (2.1); analyze issues regarding excessive damages, evidentiary support for verdict, remittitur, and passion/prejudice (.8); draft oral argument points for presentation to the court (.4).	3.30	$2,227.50
07/14/26	JRDO	Attend hearing on motion for new trial.	1.00	$675.00
07/14/26	JRDO	Strategize with attorney team on results of hearing on motion for new trial.	0.60	$405.00
07/14/26	TFCA	Emails regarding motion regarding remittitur.	0.30	$457.50
07/15/26	AROU	Analyze order denying motion for new trial or, in the alternative, conditional remittitur.	0.20	$200.00
07/15/26	ERR	Review final order from court regarding motion for new trial.	0.50	$625.00
07/15/26	JRDO	Analyze order on motion for new trial.	0.10	$67.50
		Task Total:	42.30	$43,796.50

046 JCCP 5108 Litigation (Case No. 22CV023400) – Claim No. 230

07/01/26	AROU	Attention to discovery plan and defense strategy for trial.	0.60	$600.00
07/01/26	JRDO	Continue to draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.70	$472.50
07/02/26	AROU	Revise draft correspondence to plaintiff's counsel regarding initial discovery and request for expedited discovery on an informal basis.	0.40	$400.00

07/02/26	AROU	Analyze potential expert witness candidates.	0.30	$300.00
07/02/26	JRDO	Strategize with attorney team on revisions to informal discovery letter to counsel.	0.20	$135.00
07/03/26	JRDO	Continue to draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.50	$337.50
07/06/26	EES	Strategize regarding informal and formal discovery to be conducted in advance of trial.	0.50	$387.50
07/07/26	AROU	Strategize regarding formal written discovery to plaintiff.	0.40	$400.00
07/07/26	AROU	Strategize regarding process for completion of discovery on expedited timeline.	0.20	$200.00
07/07/26	EES	Review prior correspondence with counsel regarding discovery.	0.30	$232.50
07/07/26	EES	Draft correspondence to counsel regarding discovery plan.	0.80	$620.00
07/07/26	JRDO	Strategize with attorney team on drafting discovery requests to propound on plaintiff.	0.30	$202.50
07/07/26	TFCA	Review emails regarding letter to opposing counsel regarding discovery.	0.20	$305.00
07/08/26	AROU	Strategize regarding JCCP 5108 motion to compel regarding scope of third-party perpetrator and survivor discovery.	0.20	$200.00
07/08/26	EES	Strategize regarding review of deposition testimony of key witnesses, expedited discovery, and drafting of written discovery requests.	0.30	$232.50
07/08/26	EES	Follow up with opposing counsel regarding call related to discovery plan.	0.10	$77.50
07/09/26	AROU	Strategize regarding transcript of the deposition of plaintiff.	0.60	$600.00
07/09/26	AROU	Draft responses and objections to requests for production.	2.40	$2,400.00
07/09/26	AROU	Draft fact sheet objections and responses.	3.60	$3,600.00
07/09/26	AROU	Call with plaintiff's counsel regarding case management and discovery.	0.40	$400.00
07/09/26	EES	Call with opposing counsel regarding discovery.	0.40	$310.00

07/09/26	EES	Begin analyzing transcripts from prior depositions.	0.70	$542.50
07/09/26	EES	Correspond with opposing counsel regarding discovery plan.	0.30	$232.50
07/09/26	JRDO	Begin to draft requests for production of documents to propound on plaintiff.	0.50	$337.50
07/09/26	KAFA	Begin to prepare response to fact sheet and initial document demand (.6); gather priest files for production (.5).	1.10	$528.00
07/09/26	TFCA	Telephone call with Foley team and opposing counsel regarding discovery.	0.50	$762.50
07/10/26	AROU	Draft responses and objections to requests for production.	1.30	$1,300.00
07/10/26	AROU	Draft fact sheet objections and responses.	1.20	$1,200.00
07/10/26	AROU	Analyze documents pertaining to alleged perpetrator and prepare RCBO's production of documents.	1.60	$1,600.00
07/10/26	JRDO	Continue to draft requests for production and requests for admission of documents to propound on plaintiff.	0.50	$337.50
07/10/26	KAFA	Prepare transcript excerpts for E. Soldon regarding plaintiff and priest testimony (.8); meeting with J. Doti to discuss preparation of discovery (.3); prepare information for inclusion in fact sheet response (1.3).	2.40	$1,152.00
07/13/26	AROU	Draft responses and objections to requests for production.	1.10	$1,100.00
07/13/26	AROU	Analyze documents pertaining to alleged perpetrator and prepare RCBO's production of documents.	0.90	$900.00
07/14/26	EES	Draft special interrogatories.	3.90	$3,022.50
07/15/26	AROU	Strategize regarding appellate argument regarding Proposition 51, pending discovery disputes in JCCP 5108, and approach for defense of bellwether trial.	0.50	$500.00
07/20/26	AROU	Revise draft requests for production to plaintiff.	1.40	$1,400.00
07/20/26	AROU	Revise draft special interrogatories to plaintiff.	1.90	$1,900.00

07/20/26	EES	Attention to correspondence with opposing counsel regarding stipulation to liability.	0.20	$155.00
07/20/26	TFCA	Emails regarding stipulation regarding liability and respond (.2); review language and respond (.2).	0.40	$610.00
07/23/26	AROU	Revise fact sheet objections and responses.	3.10	$3,100.00
07/24/26	AROU	Strategize regarding priest file and sensitive issues files regarding alleged abuse by accused party in preparation of document production.	2.50	$2,500.00
07/24/26	AROU	Revise fact sheet objections and responses.	1.60	$1,600.00
07/24/26	KAFA	Analysis of plaintiff's fact sheet and response to initial document demand.	0.60	$288.00
07/28/26	EES	Update service list.	0.10	$77.50
07/30/26	AROU	Strategize regarding documents pertaining to accused party in preparation of initial document production.	1.10	$1,100.00
		Task Total:	42.80	$38,658.00

047 JCCP 5108 Litigation (Case No. 22CV022633) – Claim No. 76

07/01/26	AROU	Attention to discovery plan and defense strategy for trial.	0.60	$600.00
07/01/26	JRDO	Draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.70	$472.50
07/02/26	AROU	Analyze potential expert witness candidates.	0.30	$300.00
07/02/26	AROU	Revise draft correspondence to plaintiff's counsel regarding initial discovery and request for expedited discovery on an informal basis.	0.40	$400.00
07/03/26	JRDO	Continue to draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.60	$405.00
07/07/26	AROU	Strategize regarding process for completion of discovery on expedited timeline.	0.20	$200.00
07/07/26	AROU	Strategize regarding formal written discovery to plaintiff.	0.40	$400.00

07/08/26	AROU	Strategize regarding JCCP 5108 motion to compel regarding scope of third-party perpetrator and survivor discovery.	0.20	$200.00
07/09/26	JRDO	Begin to draft requests for production of documents to propound on plaintiff.	0.60	$405.00
07/10/26	JRDO	Continue to draft requests for production and requests for admission of documents to propound on plaintiff.	0.60	$405.00
07/13/26	ERR	Review letter from Westport.	0.80	$1,000.00
07/20/26	ERR	Review plaintiff's submission regarding change of case regarding Westport drop-down position and preparation for case management conference.	1.00	$1,250.00
07/22/26	ERR	Review strategy regarding issues.	0.80	$1,000.00
07/24/26	JRDO	Strategize with attorney team on propounding discovery requests on plaintiff.	0.20	$135.00
07/27/26	JRDO	Strategize with attorney team on propounding discovery requests on plaintiff.	0.20	$135.00
07/28/26	EES	Update service list.	0.10	$77.50
07/30/26	AROU	Strategize regarding transcripts from hearings on relief from stay motions.	0.90	$900.00
		Task Total:	8.60	$8,285.00

048 JCCP 5108 Litigation (Case No. 22CV020135) – Claim No. 172

07/01/26	AROU	Strategize regarding Clergy III deposition testimony regarding accused party.	0.90	$900.00
07/01/26	JRDO	Draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.70	$472.50
07/02/26	AROU	Analyze potential expert witness candidates.	0.30	$300.00
07/02/26	AROU	Revise draft correspondence to plaintiff's counsel regarding initial discovery and request for expedited discovery on an informal basis.	0.40	$400.00
07/03/26	JRDO	Continue to draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.60	$405.00

07/07/26	AROU	Strategize regarding process for completion of discovery on expedited timeline.	0.20	$200.00
07/07/26	AROU	Strategize regarding formal written discovery to plaintiff.	0.40	$400.00
07/08/26	AROU	Strategize regarding JCCP 5108 motion to compel regarding scope of third-party perpetrator and survivor discovery.	0.20	$200.00
07/09/26	JRDO	Begin to draft requests for production of documents to propound on plaintiff.	0.60	$405.00
07/15/26	AROU	Strategize regarding appellate argument regarding Proposition 51, pending discovery disputes in JCCP 5108, and approach for defense of bellwether trial.	0.50	$500.00
07/20/26	JRDO	Continue to draft requests for production of documents to propound on plaintiff.	0.40	$270.00
07/28/26	EES	Update service list.	0.10	$77.50
07/30/26	AROU	Draft fact sheet responses and objections.	2.10	$2,100.00
07/31/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial strategy.	0.70	$700.00
07/31/26	JRDO	Correspond with plaintiff's counsel on facilitating exchange of documents for discovery.	0.10	$67.50
		Task Total:	8.20	$7,397.50

049 JCCP 5108 Litigation (Case No. 22CV020348) – Claim No. 144

07/01/26	AROU	Strategize regarding Clergy III deposition testimony regarding accused party.	0.90	$900.00
07/01/26	JRDO	Draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.60	$405.00
07/02/26	AROU	Analyze potential expert witness candidates.	0.30	$300.00
07/02/26	AROU	Revise draft correspondence to plaintiff's counsel regarding initial discovery and request for expedited discovery on an informal basis.	0.40	$400.00

07/03/26	JRDO	Continue to draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.60	$405.00
07/07/26	AROU	Strategize regarding process for completion of discovery on expedited timeline.	0.20	$200.00
07/07/26	AROU	Strategize regarding formal written discovery to plaintiff.	0.40	$400.00
07/08/26	AROU	Strategize regarding JCCP 5108 motion to compel regarding scope of third-party perpetrator and survivor discovery.	0.20	$200.00
07/09/26	JRDO	Begin to draft requests for production of documents to propound on plaintiff.	0.60	$405.00
07/10/26	JRDO	Continue to draft requests for production and requests for admission of documents to propound on plaintiff.	0.60	$405.00
07/15/26	AROU	Strategize regarding appellate argument regarding Proposition 51, pending discovery disputes in JCCP 5108, and approach for defense of bellwether trial.	0.50	$500.00
07/20/26	JRDO	Continue to draft requests for production of documents to propound on plaintiff.	0.50	$337.50
07/21/26	JRDO	Continue to draft requests for production of documents to propound on plaintiff.	0.30	$202.50
07/28/26	EES	Update service list.	0.10	$77.50
07/30/26	AROU	Draft fact sheet responses and objections.	2.10	$2,100.00
07/31/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial strategy.	0.70	$700.00
07/31/26	JRDO	Correspond with plaintiff's counsel on facilitating exchange of documents for discovery.	0.10	$67.50
		Task Total:	9.10	$8,005.00

050 JCCP 5108 Litigation (Case No. 23CV030984) – Claim No. 552

07/01/26	AROU	Strategize regarding Clergy III deposition testimony regarding accused party.	0.90	$900.00
07/01/26	JRDO	Draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.60	$405.00
07/02/26	AROU	Revise draft correspondence to plaintiff's counsel regarding initial discovery and request for expedited discovery on an informal basis.	0.40	$400.00
07/02/26	AROU	Analyze potential expert witness candidates.	0.30	$300.00
07/03/26	JRDO	Continue to draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.60	$405.00
07/06/26	JRDO	Strategize with attorney team on drafting discovery to propound on plaintiff.	0.10	$67.50
07/07/26	AROU	Strategize regarding process for completion of discovery on expedited timeline.	0.20	$200.00
07/07/26	AROU	Strategize regarding formal written discovery to plaintiff.	0.40	$400.00
07/08/26	AROU	Strategize regarding JCCP 5108 motion to compel regarding scope of third-party perpetrator and survivor discovery.	0.20	$200.00
07/08/26	JRDO	Strategize with attorney team on drafting discovery requests.	0.10	$67.50
07/09/26	JRDO	Begin to draft requests for production of documents to propound on plaintiff.	0.50	$337.50
07/10/26	JRDO	Continue to draft requests for production and requests for admission of documents to propound on plaintiff.	0.50	$337.50
07/15/26	AROU	Strategize regarding appellate argument regarding Proposition 51, pending discovery disputes in JCCP 5108, and approach for defense of bellwether trial.	0.50	$500.00
07/21/26	JRDO	Continue to draft requests for production of documents to propound on plaintiff.	0.40	$270.00
07/28/26	EES	Update service list.	0.10	$77.50

07/28/26	JRDO	Strategize with attorney team on responding to plaintiff's request to meet and confer on production of documents.	0.10	$67.50
07/29/26	JRDO	Correspond with plaintiff's counsel on meeting and conferring to exchange documents in preparation for trial.	0.20	$135.00
07/30/26	AROU	Draft fact sheet responses and objections.	2.40	$2,400.00
07/30/26	JRDO	Continue to correspond with plaintiff's counsel on meeting and conferring to exchange documents in preparation for trial.	0.10	$67.50
07/31/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial strategy.	1.40	$1,400.00
07/31/26	AROU	Call with plaintiff's counsel.	0.80	$800.00
07/31/26	AROU	Prepare for call with plaintiff's counsel.	0.40	$400.00
07/31/26	JRDO	Compile and review relevant orders and trial documents from prior proceedings for production and exchange with plaintiff's counsel.	0.40	$270.00
07/31/26	JRDO	Meet and confer with plaintiff's counsel to discuss exchange of documents and case status.	0.80	$540.00
07/31/26	KAFA	Call with plaintiff's counsel R. Coll, T. Gross and K. Ortiz (.9); begin to research plaintiff (.5).	1.40	$672.00
		Task Total:	13.80	$11,619.50

051 JCCP 5108 Litigation (Case No. 22CV018558) – Claim No. 486

07/01/26	JRDO	Draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.60	$405.00
07/02/26	AROU	Analyze potential expert witness candidates.	0.30	$300.00
07/02/26	AROU	Revise draft correspondence to plaintiff's counsel regarding initial discovery and request for expedited discovery on an informal basis.	0.40	$400.00
07/03/26	JRDO	Continue to draft informal discovery letter to counsel requesting documents to be used at trial be produced.	0.50	$337.50

07/07/26	AROU	Strategize regarding formal written discovery to plaintiff.	0.40	$400.00
07/07/26	AROU	Strategize regarding process for completion of discovery on expedited timeline.	0.20	$200.00
07/08/26	AROU	Strategize regarding JCCP 5108 motion to compel regarding scope of third-party perpetrator and survivor discovery.	0.20	$200.00
07/09/26	JRDO	Begin to draft requests for production of documents to propound on plaintiff.	0.40	$270.00
07/10/26	AROU	Draft responses and objections to requests for production.	1.30	$1,300.00
07/10/26	AROU	Analyze documents pertaining to alleged perpetrator and prepare RCBO's production of documents.	1.60	$1,600.00
07/10/26	AROU	Draft fact sheet objections and responses.	1.20	$1,200.00
07/10/26	JRDO	Continue to draft requests for production and requests for admission of documents to propound on plaintiff.	0.40	$270.00
07/13/26	AROU	Analyze coverage correspondence and strategize regarding substitution of action as one of five bellwether cases for trial.	0.80	$800.00
07/13/26	AROU	Draft responses and objections to requests for production.	1.10	$1,100.00
07/13/26	AROU	Analyze documents pertaining to alleged perpetrator and prepare RCBO's production of documents.	0.90	$900.00
07/13/26	EES	Analyze correspondence with Westport regarding insurance coverage.	1.50	$1,162.50
07/13/26	EES	Draft joint stipulation substituting this case for other case due to insurance position.	2.00	$1,550.00
07/13/26	ERR	Review need for stipulation regarding substitution of this case under relief from stay.	0.70	$875.00
07/14/26	AROU	Correspond with R. Simons regarding Westport's coverage position (.1); draft stipulation substituting this case as the second bellwether trial (.1).	0.20	$200.00

07/14/26	AROU	Strategize regarding proposed substitution of this lawsuit for other lawsuit as second bellwether trial and stipulation regarding the same.	1.00	$1,000.00
07/14/26	EES	Revise stipulation regarding substitution of this case for other case.	0.50	$387.50
07/15/26	AROU	Strategize regarding appellate argument regarding Proposition 51, pending discovery disputes in JCCP 5108, and approach for defense of bellwether trial.	0.50	$500.00
07/15/26	JRDO	Strategize with attorney team on drafting discovery requests against plaintiff.	0.10	$67.50
07/16/26	AROU	Draft correspondence regarding proposed substitution of this case as second bellwether trial due to Westport's coverage position.	0.70	$700.00
07/16/26	JRDO	Strategize with attorney team on upcoming JCCP 5108 case management conference.	0.10	$67.50
07/17/26	AROU	Strategize regarding response to plaintiff's counsel's correspondence to court disputing substitution of this case for the other case as second bellwether trial.	0.80	$800.00
07/20/26	AROU	Strategize regarding response to plaintiff's counsel's correspondence to court disputing substitution of this case for the other case as second bellwether trial.	0.30	$300.00
07/21/26	JRDO	Continue to draft requests for production of documents to propound on plaintiff.	0.50	$337.50
07/22/26	AROU	Strategize regarding next steps for effectuating substitution of this case by way of motion.	0.60	$600.00
07/22/26	JRDO	Strategize with attorney team on propounding discovery on plaintiff.	0.10	$67.50
07/28/26	EES	Update service list.	0.10	$77.50
		Task Total:	20.00	$18,375.00
		Services Total:	760.70	$745,964.00

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Emma E. Soldon	EES	Associate	12.10	$775.00	$9,377.50
Jack R. Doti	JRDO	Associate	34.80	$636.21	$22,140.00
Mason Roberts	MR	Associate	20.70	$850.00	$17,595.00
Mary Rofaeil	MRL	Associate	75.30	$800.00	$60,240.00
Nathan C. Walsh	NCW	Associate	9.80	$650.00	$6,370.00
Nora McGuffey	NMCG	Associate	71.30	$825.00	$58,822.50
Shane J. Moses	SJM	Of Counsel	56.80	$925.00	$52,540.00
Jack Dorr	JDOR	Other	11.10	$300.00	$3,330.00
Janelle C. Harrison	JCH	Paralegal	25.70	$420.00	$10,794.00
Jesus Torres	JT	Paralegal	3.50	$460.00	$1,610.00
Kerry A. Farrar	KAFA	Paralegal	14.80	$480.00	$7,104.00
Ann Marie Uetz	AMUE	Partner	75.40	$1,225.00	$92,365.00
Alan R. Ouellette	AROU	Partner	77.90	$1,000.00	$77,900.00
David B. Goroff	DBG	Partner	67.10	$1,450.00	$97,295.00
Emil P. Khatchatourian	EPK	Partner	2.40	$1,000.00	$2,400.00
Eileen R. Ridley	ERR	Partner	42.20	$1,250.00	$52,750.00
Jeff R. Blease	JRBL	Partner	6.80	$1,575.00	$10,710.00
Mark C. Moore	MCM	Partner	103.70	$1,050.00	$108,885.00
Matthew D. Lee	MDL	Partner	12.80	$1,000.00	$12,800.00
Thomas F. Carlucci	TFCA	Partner	12.80	$1,525.00	$19,520.00
Elizabeth P. Mazzocco	EPM	Senior Counsel	8.00	$950.00	$7,600.00
Tamar N. Dolcourt	TND	Special Counsel	15.70	$880.00	$13,816.00
Totals			**760.70**		**$745,964.00**

Expenses Incurred

Description	Amount
Depositions / Transcripts, Exams	$2,929.95
Electronic Legal Research Services	$692.06
LSS - eDiscovery Services	$14,200.00
Mailing Expense	$957.17
Other Fees	$6.00
Recording / Filing Fees	$162.95
Service Fees	$177.58
Expenses Incurred Total	**$19,125.71**

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

Expense Detail

Depositions / Transcripts, Exams

Date	Initials	Description	Amount
07/15/26	JRBL	FORTZ LEGAL SUPPORT, LLC - Trial Day 7 - Rough - 07/15/26.	$2,583.25
07/31/26	JRBL	Jilio-Ryan Hunter & Olsen, Inc - Reporter's Transcript of Hearing Proceedings [In Re: Northern California Clergy Cases] - 07/31/26.	$346.70
			$2,929.95

Electronic Legal Research Services

Date	Initials	Description	Amount
07/31/26	JDOR	CONTEXT EXPERT REPORT. US MOTIONS DOC ACCESS. Docket Report. CONTEXT COMPANY PROSPECTING LIST. Westlaw. SEARCH ACCESS CHARGE. US COURT DOCUMENTS DOC ACCESS.	$692.06

US EXPERT WITNESS TESTIMONY AND REPORTS
DOC ACCESS.

LSS - eDiscovery Services

Date	Initials	Description	Amount
07/31/26	JRBL	LSS - eDiscovery Services.	$14,200.00

Mailing Expense

Date	Initials	Description	Amount
07/08/26	JRBL	FEDERAL EXPRESS CORPORATION - shipping charges SFCA office - 07/08/26.	$540.04
07/10/26	JRBL	ACE ATTORNEY SERVICE, INC. - Special messenger - 07/10/26.	$314.25
07/15/26	JRBL	FEDERAL EXPRESS CORPORATION - shipping charges SFCA office - 07/15/26.	$102.88
			$957.17

Other Fees

Date	Initials	Description	Amount
07/31/26	ASD	Other Fees--VENDOR: U.S. BANK 07/14/26 Retrieval of tentative ruling. -.	$6.00

Recording / Filing Fees

Date	Initials	Description	Amount
07/10/26	JRBL	ACE ATTORNEY SERVICE, INC. - efiling, PDF chamber copy - 07/10/26.	$162.95

Service Fees

Date	Initials	Description	Amount
07/01/26	JRBL	CASE ANYWHERE, LLC - Service Fees - 07/01/26.	$94.00
07/22/26	JRBL	ACE ATTORNEY SERVICE, INC. - LADT - June 2026 ACE Attorney Service Charges - 07/22/26.	$83.58
			$177.58

Expense Total: $19,125.71

FOLEY & LARDNER LLP

FOLEY & LARDNER LLP
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Roman Catholic Bishop of Oakland
Attn: Attila Bardos
Chief Financial Officer
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: September 29, 2026
Invoice No.: 51385310
Our Ref. No.: 100845-0402

Services through August 31, 2026

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	$659,483.50
Total Expenses:	$9,572.77
Amount Due:	**$669,056.27**

Please reference your invoice number 51385310 with your remittance payable to Foley & Lardner LLP. Payment is due promptly upon receipt of this invoice.

Federal Employer Number: 39-0473800

Professional Services Detail

003 Automatic Stay

08/03/26	ERR	Analyze proposed motion to stay for supplemental briefing.	0.80	$1,000.00
08/03/26	SJM	Research regarding privileged damages issue (1.0); email to A. Ouellette regarding same (.2).	1.20	$1,110.00
08/04/26	SJM	Confer with A. Ouellette and A. Uetz regarding motion to clarify lift stay order.	0.20	$185.00
08/05/26	AMUE	Analyze lift stay cases in state court and issue relating to "estate neutral".	0.80	$980.00
08/12/26	AMUE	Analyze privileged issue relating to lift stay order.	0.50	$612.50
08/12/26	SJM	Draft motion to clarify lift stay order.	3.60	$3,330.00
08/13/26	SJM	Continue to draft motion to clarify lift stay order.	2.50	$2,312.50
08/14/26	SJM	Respond to emails regarding bankruptcy issues related to insurer proposal for defense of remaining lift stay cases.	0.70	$647.50
08/17/26	AROU	Analyze draft motion to clarify lift stay order.	0.40	$400.00
08/24/26	AMUE	Revise motion to clarify lift stay order.	0.50	$612.50
08/26/26	AMUE	Revisions to motion to clarify lift stay order and direct for filing (1.5); communications with state court team regarding CMC relating to lift stay cases (.6).	2.10	$2,572.50
08/26/26	JCH	Revise motion to clarify stay order to add table of contents (.2); file motion, declarations in support and notice of hearing (.5); calendar objection deadline and hearing on motion to clarify (.2).	0.90	$378.00
08/26/26	SJM	Work on finalizing motion to clarify lift stay order.	2.90	$2,682.50
08/28/26	AMUE	Analyze issue relating to supplement to motion to clarify lift stay order.	0.50	$612.50
		Task Total:	17.60	$17,435.50

004 Bankruptcy Litigation/Adversary Proceedings

08/05/26	JCH	Calendar continued Case Management Conference and hearing on motions to dismiss and related briefing deadlines.	0.30	$126.00
		Task Total:	0.30	$126.00

005 Bar Date Motion/ Claims Reconcil./ Claim Reconciliation Issues

08/03/26	MCM	Email correspondence with counsel for claimant number 532 regarding allowance of claim.	0.30	$315.00
08/04/26	MRL	Review the motions to allow late-filed claims.	0.40	$320.00
08/04/26	SJM	Emails with plaintiff counsel regarding continuing hearing on late-filed claim motion (.2); review proposed stipulation for continuance (.2).	0.40	$370.00
08/05/26	JCH	Prepare draft declarations in support of oppositions to motions to allow late-filed claims.	0.40	$168.00
08/05/26	MRL	Continue analyzing the motions to allow late-filed claims.	0.50	$400.00
08/05/26	MRL	Confer with J. Harrison regarding the motions for late-filed claims.	0.30	$240.00
08/08/26	MRL	Draft the Debtor's opposition and declaration to claimant's 532 motion to allow late-filed claim.	1.00	$800.00
08/08/26	MRL	Draft the Debtor's opposition and declaration to claimant's 550 motion to allow late-filed claim.	1.20	$960.00
08/08/26	MRL	Draft the Debtor's opposition and declaration to claimant's John Doe AO motion to allow late-filed claim.	0.40	$320.00
08/09/26	MRL	Continue drafting the Debtor's opposition and declaration to claimant's John Doe AO motion to allow late-filed claim.	1.40	$1,120.00
08/10/26	MRL	Correspondence with M. Moore regarding the Debtor's oppositions to the motions to allow late-filed claim.	0.30	$240.00
08/12/26	AMUE	Analyze late-filed claim issue (.3) and communicate with M. Moore regarding same (.1).	0.40	$490.00

08/12/26	JCH	File three oppositions to motions to allow late-filed claims and declarations in support.	0.60	$252.00
08/12/26	MRL	Finalize the objections to the motions to allow late-filed claims.	0.60	$480.00
08/12/26	MRL	Email correspondence with J. Harrison regarding filing the objections to the motions to allow late-filed claims.	0.40	$320.00
08/13/26	MCM	Conference call with claimants' counsel regarding late-filed claims.	0.50	$525.00
08/17/26	MRL	Analyze the reply to the Debtor's objection to the motion to allow late-filed claim.	0.20	$160.00
08/19/26	MRL	Draft a hearing outline on the motions for late-filed claims (.4); correspondence with M. Moore regarding the same (.2).	0.60	$480.00
08/19/26	SJM	Prepare for hearing on motions by late-filed claimants for relief from bar date.	0.80	$740.00
		Task Total:	10.70	$8,700.00

006 Case Administration (docket updates, WIP, and calendar)

08/03/26	JCH	Update daily docket report.	0.50	$210.00
08/04/26	JCH	Update daily docket report.	0.50	$210.00
08/05/26	JCH	Update daily docket report.	0.50	$210.00
08/06/26	JCH	Update daily docket report.	0.50	$210.00
08/07/26	JCH	Prepare and file notice of core service list as of August 7, 2026 (.3); update daily docket report (.5).	0.80	$336.00
08/10/26	JCH	Update daily docket report.	0.50	$210.00
08/11/26	JCH	Update daily docket report.	0.50	$210.00
08/12/26	JCH	Calendar continued hearing on interim fee applications (.1); update daily docket report (.5).	0.60	$252.00
08/14/26	JCH	Update daily docket report.	0.50	$210.00
08/17/26	JCH	Update daily docket report.	0.50	$210.00
08/18/26	JCH	Update daily docket report.	0.50	$210.00

08/19/26	JCH	Update daily docket report.	0.50	$210.00
08/20/26	JCH	Update daily docket report.	0.50	$210.00
08/21/26	JCH	Update daily docket report.	0.50	$210.00
08/24/26	JCH	Update daily docket report.	0.20	$84.00
08/25/26	JCH	Request copy of August 19, 2026 hearing transcript from court reporter (.1); circulate copy of same to Foley group (.1); update daily docket report (.5).	0.70	$294.00
08/26/26	JCH	Update daily docket report.	0.50	$210.00
08/27/26	JCH	Update daily docket report.	0.20	$84.00
08/28/26	JCH	Update daily docket report.	0.20	$84.00
08/31/26	JCH	Update daily docket report.	0.50	$210.00
		Task Total:	9.70	$4,074.00

007 Chapter 11 Plan/ Plan Confirmation

08/03/26	AMUE	Meeting with M. Lee regarding insurer redline to plan.	0.60	$735.00
08/03/26	AMUE	Meeting with M. Rofaeil and N. McGuffey regarding closing brief (.3); follow up on same (.2).	0.50	$612.50
08/03/26	AMUE	Analyze closing brief issues.	2.40	$2,940.00
08/03/26	AMUE	Meeting with D. Goroff regarding closing brief strategy (.5); prepare for meeting (.2).	0.70	$857.50
08/03/26	DBG	Telephone conference with A. Uetz regarding strategy for post-trial brief.	0.50	$725.00
08/03/26	ERR	Begin review of post-confirmation trial brief.	0.80	$1,000.00
08/03/26	JDOR	Retrieve committee reports regarding HR 5884 from Library of Congress, at request of N. McGuffey.	0.40	$120.00
08/03/26	MDL	Strategize with A. Uetz regarding insurance assignment terms proposed by insurers and plan confirmation brief.	0.60	$600.00

08/03/26	MRL	Analyze the transcripts regarding testimony on cemeteries.	2.60	$2,080.00
08/03/26	MRL	Call with A. Uetz and N. McGuffey regarding revisions to the post-trial brief.	0.30	$240.00
08/03/26	MRL	Confer with N. McGuffey regarding finalizing the post-trial brief.	0.20	$160.00
08/03/26	MRL	Email correspondence with the Foley team regarding the post-trial brief.	0.20	$160.00
08/03/26	MRL	Continue revising the Debtor's post-trial brief to conform to D. Goroff's comments.	1.40	$1,120.00
08/03/26	NMCG	Call with A. Uetz and M. Rofaeil regarding post-trial confirmation brief (.3); call with T. Dolocourt regarding case law research and analysis (.3); continue drafting parts of the post-trial confirmation brief (2.4); analyze confirmation trial record in connection with post-trial confirmation brief (3.6).	6.60	$5,445.00
08/03/26	SJM	Continue to work on insurance section of post-trial brief.	5.10	$4,717.50
08/03/26	TND	Further review of legislative history for post-confirmation brief.	0.20	$176.00
08/04/26	AMUE	Confer with M. Rofaeil and N. McGuffey regarding revisions to closing brief (.5); strategize with M. Lee regarding privileged issue relating to closing brief (.5).	1.00	$1,225.00
08/04/26	AMUE	Revisions to post-trial brief interspersed with related communications with team members regarding privileged issues.	5.60	$6,860.00
08/04/26	DBG	Communications with N. McGuffey regarding Shields question.	0.20	$290.00
08/04/26	MDL	Evaluate absolute priority rule argument for post-trial brief.	0.50	$500.00
08/04/26	MRL	Continue analyzing the transcripts regarding testimony on cemeteries.	0.60	$480.00
08/04/26	MRL	Review the deposition designations regarding testimony on cemeteries.	0.80	$640.00
08/04/26	MRL	Continue revising the Debtor's post-trial brief to conform to D. Goroff's comments.	0.70	$560.00

08/04/26	NMCG	Continue working on post-trial brief.	0.90	$742.50
08/04/26	SJM	Continue working on insurance section of post-trial brief.	2.80	$2,590.00
08/04/26	SJM	Review post-trial brief.	2.80	$2,590.00
08/04/26	TND	Further research on additional legislative history obtained for post-confirmation brief.	0.80	$704.00
08/05/26	AMUE	Revisions to closing brief.	6.20	$7,595.00
08/05/26	DBG	Prepare inserts and edits to post-trial brief (2.9); communications with A. Uetz and M. Moore regarding same (.4).	3.30	$4,785.00
08/05/26	ERR	Edit draft post-confirmation trial brief.	3.00	$3,750.00
08/05/26	MCM	Attention to revisions to draft RCBO post-trial brief prior to submission on August 7.	1.30	$1,365.00
08/05/26	MDL	Email correspondence with Committee counsel regarding insurer redlines to plan.	0.30	$300.00
08/05/26	MDL	Strategize with Foley team regarding best interests test and absolute priority rule sections of post-trial brief.	1.00	$1,000.00
08/05/26	MRL	Confer with N. McGuffey regarding revisions to the post-trial brief.	0.20	$160.00
08/05/26	MRL	Call with N. McGuffey and A. Uetz regarding revisions to the post-trial brief.	0.60	$480.00
08/05/26	MRL	Email correspondence with the Foley team regarding the post-trial brief.	0.40	$320.00
08/05/26	MRL	Continue revising the Debtor's post-trial brief to conform to the Foley team's comments.	2.20	$1,760.00
08/05/26	MRL	Analyze certain transcripts for the post-trial brief.	0.40	$320.00
08/05/26	NMCG	Call with A. Uetz and M. Rofaeil regarding revisions to the post-trial confirmation brief (.6); continue with revisions to the post-trial brief (2.7).	3.30	$2,722.50
08/06/26	AMUE	Review client's comments to closing brief (1.5) and meet with M. Moore, N. McGuffey and M. Rofaeil to analyze revisions to closing brief (1.0).	2.50	$3,062.50
08/06/26	AMUE	Further revisions to closing brief.	2.50	$3,062.50

08/06/26	DBG	Review Baltimore Diocese decision and team communications regarding same (.5); communications with M. Rofaeil regarding finalizing post-trial brief (.2).	0.70	$1,015.00
08/06/26	JDOR	Internal communication and records request to the Library of Congress, at request of N. McGuffey.	0.40	$120.00
08/06/26	MCM	Analysis of client comments to RCBO post-trial brief (.8); meeting with Foley team to discuss same and incorporate as necessary (1.0); internal email correspondence regarding confirmation issues (.3).	2.10	$2,205.00
08/06/26	MDL	Revise post-trial brief.	6.20	$6,200.00
08/06/26	MDL	Strategize regarding order of arguments in post-trial brief.	1.90	$1,900.00
08/06/26	MRL	Continue revising the Debtor's post-trial brief to conform to the Foley team's comments.	4.20	$3,360.00
08/06/26	MRL	Email correspondence with the Foley team regarding the revisions to the post-trial brief.	0.60	$480.00
08/06/26	MRL	Confer with D. Goroff regarding revisions to the post-trial brief.	0.20	$160.00
08/06/26	MRL	Confer with A. Uetz and M. Moore regarding revisions to the post-trial brief.	0.90	$720.00
08/06/26	NMCG	Continue working on post-trial confirmation brief.	1.00	$825.00
08/07/26	AMUE	Final revisions to closing brief and multiple communications with Foley team throughout the process.	4.80	$5,880.00
08/07/26	DBG	Draft insert for post-trial brief regarding Baltimore decision.	1.60	$2,320.00
08/07/26	JCH	Prepare appendix with exhibits for filing (.4); revise post-trial brief to add table of authorities (.8); finalize and file post-trial brief (.5).	1.70	$714.00
08/07/26	MCM	Finalization of RCBO post-trial brief for filing pursuant to prior agreed deadlines.	2.50	$2,625.00
08/07/26	MDL	Strategize regarding finalization of post-trial brief.	0.90	$900.00
08/07/26	MDL	Continue revising post-trial brief.	4.70	$4,700.00

08/07/26	MRL	Continue revising the Debtor's post-trial brief to conform to A. Uetz's comments (4.2); revise the appendix in support of the post-trial brief (1.0).	5.20	$4,160.00
08/07/26	MRL	Confer with M. Lee regarding revisions to the post-trial brief.	0.20	$160.00
08/07/26	MRL	Confer with N. McGuffey regarding finalizing the post-trial brief.	0.10	$80.00
08/07/26	MRL	Confer with N. McGuffey and A. Uetz regarding revisions to the post-trial brief.	0.30	$240.00
08/07/26	MRL	Email correspondence with the Foley team regarding filing the post-trial brief.	0.60	$480.00
08/07/26	MRL	Continue revising the Debtor's post-trial brief to conform to M. Lee's comments.	4.00	$3,200.00
08/07/26	MRL	Confer with S. Moses regarding finalizing the post-trial brief.	0.20	$160.00
08/07/26	MRL	Confer with A. Uetz regarding revisions to the post-trial brief.	0.10	$80.00
08/07/26	NMCG	Revise post-confirmation brief, including incorporating comments received from client and Foley team, reviewing citations to the evidentiary record, and assisting in finalizing brief (6.4); various correspondences with Foley team regarding revisions and comments to post-trial brief (.8).	7.20	$5,940.00
08/07/26	SJM	Work on final revisions to insurance section of post-trial brief.	2.20	$2,035.00
08/08/26	MCM	Analysis of post-trial briefs filed by Committee and insurers.	1.50	$1,575.00
08/08/26	MRL	Analyze the post-trial oppositions to confirmation of the plan.	0.70	$560.00
08/08/26	SJM	Emails to client and Debtor professionals regarding filed post-trial brief.	0.60	$555.00
08/09/26	DBG	Review Committee's post-trial brief and draft substantive analysis regarding same.	5.90	$8,555.00
08/09/26	MRL	Continue analyzing the post-trial oppositions to confirmation of the plan.	0.50	$400.00

08/10/26	AMUE	Analyze arguments in closing briefs to work on reply briefs.	3.50	$4,287.50
08/10/26	JCH	Prepare a reply to objections filed to plan confirmation.	0.50	$210.00
08/10/26	MCM	Analysis of post-trial briefs filed by various parties, particularly the Committee.	1.50	$1,575.00
08/10/26	MRL	Correspondence with M. Moore regarding the insurers' objections to the plan.	0.20	$160.00
08/10/26	MRL	Continue analyzing the post-trial oppositions to confirmation of the plan.	1.90	$1,520.00
08/10/26	SJM	Analyze post-trial briefs in opposition to plan confirmation.	2.10	$1,942.50
08/11/26	AMUE	Meeting with Foley team to strategize regarding reply briefs (.8) and analyze arguments related thereto (1.7).	2.50	$3,062.50
08/11/26	DBG	Team strategy call led by A. Uetz (.7); call with M. Moore regarding preparation of reply briefs (.2); review legal research regarding Committee's First Amendment/RFRA arguments (3.5); begin drafting reply to Committee's First Amendment arguments (1.6).	6.00	$8,700.00
08/11/26	MCM	Meeting with Foley team to discuss bifurcated reply structure due August 19 (.7); outline reply to Committee's post-trial brief (1.8).	2.50	$2,625.00
08/11/26	MDL	Strategize with Foley team for response to Committee and insurer confirmation objections.	0.40	$400.00
08/11/26	MRL	Call with the Foley team to discuss strategies for the Debtor's reply to the post-trial objecting briefs (partial).	0.50	$400.00
08/11/26	MRL	Analyze the insurers' objections to the plan.	0.90	$720.00
08/11/26	MRL	Confer with M. Moore regarding the Committee's post-trial brief.	0.20	$160.00
08/11/26	MRL	Correspondence with J. Harrison regarding the Debtor's reply to the post-trial objecting briefs.	0.20	$160.00
08/11/26	NMCG	Foley meeting regarding responding to post-trial briefs (partial).	0.50	$412.50

08/11/26	SJM	Team call regarding preparation of reply briefs (partial).	0.50	$462.50
08/12/26	DBG	Drafting constitutional law section of reply (2.5); review legal research regarding same (3.5).	6.00	$8,700.00
08/12/26	ERR	Begin review of post-trial briefs regarding Committee and insurers.	1.50	$1,875.00
08/12/26	MCM	Continue working on detailed outline for draft reply to Committee, including legal analysis of Committee post-trial brief.	1.90	$1,995.00
08/12/26	MRL	Confer with A. Uetz regarding the Committee's post-trial brief.	0.10	$80.00
08/12/26	MRL	Correspondence with S. Moses regarding the Debtor's reply to the insurers' post-trial briefs.	0.20	$160.00
08/12/26	SJM	Work on outlining arguments for brief in response to insurer post-trial brief.	3.70	$3,422.50
08/13/26	DBG	Continued drafting of constitutional law section (5.0); review legal research regarding same (1.5).	6.50	$9,425.00
08/13/26	EPM	Review insurer post-confirmation trial briefs (.2); prepare for call with E. Ridley and S. Moses regarding reply brief (.2); call with E. Ridley and S. Moses to discuss post-confirmation trial reply brief (.9).	1.30	$1,235.00
08/13/26	ERR	Review strategy regarding response to insurers' post-confirmation trial brief.	1.00	$1,250.00
08/13/26	JDOR	Provide committee reports and hearings regarding 1933 and 1934 Bankruptcy Reform Acts through the Library of Congress, at request of N. McGuffey.	0.40	$120.00
08/13/26	MRL	Analyze case law regarding the insurance assignment (2.9); email correspondence with S. Moses regarding the same (.2).	3.10	$2,480.00
08/13/26	MRL	Revise the outline for the reply to the Committee's post-trial brief.	0.40	$320.00
08/13/26	SJM	Call with E. Mazzocco and E. Ridley regarding response to insurer post-trial brief.	0.90	$832.50
08/13/26	SJM	Work on response to insurers' brief in opposition to plan confirmation.	3.50	$3,237.50

08/14/26	DBG	Continue drafting constitutional law section (4.9); legal research regarding same (.7); confer with M. Kemner, M. Moore, and M. Rofaeil (.4).	6.00	$8,700.00
08/14/26	EPM	Continue reviewing insurers' post-confirmation trial briefs.	1.70	$1,615.00
08/14/26	MCM	Draft reply to Committee's post-trial brief.	2.50	$2,625.00
08/14/26	MRL	Continue revising the outline for the reply to the Committee's post-trial brief.	2.30	$1,840.00
08/14/26	MRL	Email correspondence with the Foley team regarding status of the briefs.	0.20	$160.00
08/14/26	NCW	Analysis of issues related to insurers' post-trial briefs.	2.80	$1,820.00
08/14/26	SJM	Work on brief in response to insurer post-trial brief.	4.30	$3,977.50
08/15/26	DBG	Continue drafting reply brief section regarding constitutional issues (5.8); review legal research regarding same (.8).	6.60	$9,570.00
08/15/26	MCM	Analyze inserts for religious-freedom and constitutional arguments in RCBO reply brief to Committee (1.5); work on incorporation of same into draft (1.0).	2.50	$2,625.00
08/15/26	MRL	Draft the Debtor's reply to the Committee's post-trial brief.	1.70	$1,360.00
08/15/26	MRL	Analyze case law regarding the discharge issues for the Debtor's reply to the insurers' objections.	0.50	$400.00
08/15/26	SJM	Work on brief in response to insurer post-trial brief.	3.50	$3,237.50
08/15/26	SJM	Continue work on brief in response to insurer post-trial brief.	2.00	$1,850.00
08/16/26	DBG	Revise reply brief.	2.30	$3,335.00
08/16/26	EPM	Continue reviewing insurers' post-confirmation trial briefs (2.5); draft post-confirmation trial reply brief with focus on plan's treatment of bad faith claims (3.4).	5.90	$5,605.00
08/16/26	MCM	Revise draft RCBO reply to Committee's post-trial brief and circulate same for review by Foley team.	5.30	$5,565.00

08/16/26	MRL	Confer with D. Goroff regarding revisions to the Debtor's reply.	0.20	$160.00
08/16/26	MRL	Continue drafting the Debtor's reply to the Committee's post-trial brief.	2.00	$1,600.00
08/16/26	MRL	Email correspondence with the Foley team regarding status of the briefs.	0.20	$160.00
08/16/26	NCW	Draft response to insurers' post-trial brief regarding delayed discharge under section 1141.	3.50	$2,275.00
08/16/26	NMCG	Research case law in connection with reply post-confirmation brief.	3.40	$2,805.00
08/16/26	SJM	Work on brief in response to insurer post-trial brief.	8.40	$7,770.00
08/17/26	AMUE	Work on arguments for reply to Committee's closing brief.	5.50	$6,737.50
08/17/26	DBG	Confer with A Uetz and M.Moore regarding edits to reply.	0.30	$435.00
08/17/26	EPM	Continue drafting post-confirmation trial reply brief with focus on plan’s treatment of bad faith claims.	3.50	$3,325.00
08/17/26	MCM	Revise draft reply to Committee's post-trial brief.	2.80	$2,940.00
08/17/26	MRL	Confer with A. Uetz regarding revisions to the Debtor's reply to the Committee's objection to the plan.	0.10	$80.00
08/17/26	MRL	Analyze other diocese cases regarding discharge provisions.	1.50	$1,200.00
08/17/26	MRL	Revise the Debtor's reply to the Committee's post-trial brief to conform to D. Goroff's comments.	1.90	$1,520.00
08/17/26	MRL	Email correspondence with the Foley team regarding the Debtor's reply to the Committee's post-trial brief.	0.20	$160.00
08/17/26	SJM	Continue to work on response to insurer post-trial brief.	5.80	$5,365.00
08/18/26	AMUE	Revisions to reply to Committee's closing brief.	2.50	$3,062.50
08/18/26	EPM	Provide comments on insurance post-confirmation reply brief.	1.30	$1,235.00

08/18/26	JCH	Revise reply brief to add table of contents and table of authorities.	0.50	$210.00
08/18/26	MCM	Attention to RCBO reply to Committee's post-trial brief and related filing issues.	1.50	$1,575.00
08/18/26	MRL	Revise the Debtor's reply to the Committee's objection to the plan.	1.00	$800.00
08/18/26	MRL	Revise the Debtor's reply to the insurers' objection to the plan.	1.90	$1,520.00
08/18/26	MRL	Email correspondence with the Foley team regarding the Debtor's replies.	0.20	$160.00
08/18/26	NCW	Conduct legal research regarding issues related to plan interpretation in connection with insurers' post-trial brief.	1.10	$715.00
08/19/26	AMUE	Final revisions to closing briefs relating to plan confirmation.	3.40	$4,165.00
08/19/26	DBG	Review edits to RCBO reply of Covington and client.	0.40	$580.00
08/19/26	EPM	Continue revising insurance post-confirmation reply brief.	3.00	$2,850.00
08/19/26	ERR	Edit reply brief in response to Committee's objection.	2.00	$2,500.00
08/19/26	ERR	Edit reply brief in response to insurers' objections to plan and confirmation.	3.00	$3,750.00
08/19/26	JCH	Revise reply brief to add table of contents and table of authorities (.5); additional revisions to reply briefs to update tables of contents and tables of authorities (.8); file reply briefs (.4).	1.70	$714.00
08/19/26	MCM	Final review and approval of RCBO reply to Committee's post-trial brief and related filings.	1.50	$1,575.00
08/19/26	MDL	Revise reply to insurers' post-trial briefs.	2.30	$2,300.00
08/19/26	MDL	Revise reply to Committee's post-trial brief.	5.60	$5,600.00
08/19/26	MRL	Confer with M. Lee regarding the Debtor's replies.	0.10	$80.00
08/19/26	MRL	Analyze the client's comments to the Debtor's replies.	0.20	$160.00
08/19/26	MRL	Revise the Debtor's reply to the Committee's objection to the plan.	1.90	$1,520.00

08/19/26	MRL	Email correspondence with the Foley team regarding the Debtor's replies.	0.20	$160.00
08/19/26	MRL	Confer with A. Uetz regarding the Debtor's reply to the Committee's objection to the plan.	0.30	$240.00
08/19/26	MRL	Revise the Debtor's reply to the insurers' objection to the plan.	1.80	$1,440.00
08/19/26	SJM	Work on revisions to brief in response to insurer post-trial brief.	2.90	$2,682.50
08/20/26	MCM	Analysis of Committee and insurer replies or responses to post-trial briefs.	1.50	$1,575.00
08/20/26	MRL	Analyze the Committee's reply to the Debtor's post-trial brief.	0.30	$240.00
08/20/26	SJM	Initial review of reply post-trial briefs in opposition to plan.	1.40	$1,295.00
08/21/26	MCM	Review of reply briefs filed by Committee and various insurers relating to confirmation.	2.00	$2,100.00
08/24/26	AMUE	Prepare for closing argument.	1.20	$1,470.00
08/24/26	MDL	Strategize with A. Uetz regarding closing statement and preparation for 9/16 hearing.	0.70	$700.00
08/24/26	MRL	Email correspondence with the Foley team regarding preparations for the closing statements.	0.30	$240.00
08/24/26	NMCG	Confer with A. Uetz regarding post-trial briefing and closing argument preparations (.2); attention to email with task list regarding preparations (.1).	0.30	$247.50
08/25/26	AMUE	Analyze privileged issues in preparation for closing argument.	3.20	$3,920.00
08/25/26	DBG	Communications with M. Kemner regarding constitutional issues.	0.40	$580.00
08/25/26	EPM	Review insurer post-confirmation briefs in preparation for closing arguments.	3.30	$3,135.00
08/25/26	MCM	Review of reply briefs filed by Committee and various insurers in advance of proposed closing arguments on September 16, 2026.	1.80	$1,890.00
08/25/26	MDL	Evaluate arguments to be made at closing argument hearing.	0.30	$300.00

08/25/26	MDL	Evaluate possible grounds for negotiation with insurers.	0.30	$300.00
08/25/26	MRL	Email correspondence with the Foley team regarding preparations for the closing statements.	0.20	$160.00
08/25/26	NMCG	Analyze post-trial briefs in connection with preparations for closing arguments.	5.60	$4,620.00
08/25/26	SJM	Review confirmation briefing and work on identifying potential questions for closing argument preparation.	3.50	$3,237.50
08/26/26	AMUE	Prepare for closing arguments.	1.40	$1,715.00
08/26/26	DBG	Confer with M. Kemner, A. Uetz, and M. Moore regarding First Amendment issues.	0.90	$1,305.00
08/26/26	EPM	Continue reviewing insurer post-confirmation briefs in preparation for closing arguments.	4.40	$4,180.00
08/26/26	MRL	Research case law regarding motions to stay pending appeal.	1.00	$800.00
08/26/26	NMCG	Review post-trial briefs in connection with preparations for closing arguments.	8.50	$7,012.50
08/26/26	SJM	Analyze list of closing argument preparation questions related to Committee (.6); call with N. McGuffey regarding same (.4).	1.00	$925.00
08/27/26	AMUE	Analyze possible questions for closing argument.	2.40	$2,940.00
08/27/26	EPM	Draft oral argument preparation materials related to insurance issues (3.8); call with S. Moses regarding same (1.1).	4.90	$4,655.00
08/27/26	MRL	Continue researching case law regarding motions to stay pending appeal.	0.90	$720.00
08/27/26	MRL	Email correspondence with the Foley team regarding preparations for the closing statements.	0.20	$160.00
08/27/26	NMCG	Review post-trial briefs in connection with preparations for closing arguments.	0.40	$330.00
08/27/26	SJM	Review closing argument preparation memo related to Committee (.8); review closing argument preparation memo related to insurers (1.2).	2.00	$1,850.00

08/27/26	SJM	Call with E. Mazzocco regarding preparation for calling arguments on insurance issues.	1.00	$925.00
08/28/26	AMUE	Prepare for closing argument (2.6), including discussion with Foley team to finalize anticipated questions (.6).	3.20	$3,920.00
08/28/26	EPM	Review revised oral argument preparation materials on insurance issues.	0.20	$190.00
08/28/26	MCM	Prepare for closing arguments scheduled for September 16.	0.50	$525.00
08/28/26	MDL	Revise plan post-confirmation question outlines for Bankruptcy Code and insurance matters.	1.80	$1,800.00
08/28/26	MDL	Strategize with Foley team regarding preparation for post-confirmation oral argument.	0.60	$600.00
08/28/26	MRL	Email correspondence with the Foley team regarding preparations for the closing hearing.	0.20	$160.00
08/28/26	MRL	Continue researching case law regarding motions to stay pending appeal.	2.30	$1,840.00
08/28/26	NMCG	Continue reviewing post-trial briefs in connection with preparations for closing arguments, including preparing memo outline with A. Uetz and M. Lee.	3.50	$2,887.50
08/28/26	SJM	Draft response regarding Committee arguments mischaracterizing operation of RCWC escrow.	0.40	$370.00
08/30/26	MCM	Prepare for closing argument scheduled for September 16.	0.80	$840.00
08/31/26	AMUE	Review confirmation briefs in preparation for closing argument.	2.50	$3,062.50
08/31/26	AMUE	Meeting with Foley trial team to prepare for closing arguments.	1.00	$1,225.00
08/31/26	DBG	Review Committee reply brief (1.5); revise possible Q&A's and A's for closing argument (1.5); attend team call led by A. Uetz regarding strategy and tasks for closing argument (1.0).	4.00	$5,800.00
08/31/26	DBG	Review communications regarding new bill introduced to provide public entities relief regarding AB218.	0.40	$580.00
08/31/26	MCM	Participate in meeting with Foley team regarding closing arguments.	1.00	$1,050.00

08/31/26	MCM	Prepare for closing arguments scheduled for September 16.	1.00	$1,050.00
08/31/26	MDL	Strategize with Foley team for oral argument on 9/16.	1.10	$1,100.00
08/31/26	MRL	Email correspondence with the Foley team regarding preparations for the closing statements.	0.30	$240.00
08/31/26	MRL	Continue researching case law regarding motions to stay pending appeal.	1.10	$880.00
08/31/26	NMCG	Continue preparations for closing argument on confirmation.	2.50	$2,062.50
08/31/26	SJM	Review research regarding potential ability to obtain suspension of bankruptcy case pending appeal of confirmation order.	0.70	$647.50
08/31/26	SJM	Review closing argument preparation memos in preparation for planning call (.8); participate in Foley team planning call (1.0).	1.80	$1,665.00
		Task Total:	401.00	$410,220.50

008 Communications with Client

08/02/26	MCM	Communications with client regarding case issues.	0.50	$525.00
08/03/26	AMUE	Review communication received from M. Kemner regarding privileged matter (.2); confer with Foley team and respond to same (.6).	0.80	$980.00
08/03/26	MCM	Conference call with client parties regarding case matters.	1.00	$1,050.00
08/03/26	MDL	Email exchange with A. Bardos regarding DIP financing facility question and further draws from facility.	0.10	$100.00
08/05/26	AMUE	Communications with client relating to Livermore.	0.60	$735.00
08/05/26	AMUE	Communications with client relating to statement regarding Livermore and revisions to same.	0.80	$980.00
08/05/26	AMUE	Communications with M. Kemner regarding closing brief.	0.30	$367.50

08/12/26	AMUE	Communication with Bishop Barber regarding privileged matter.	0.30	$367.50
08/13/26	MCM	Conference call and email correspondence with client parties regarding case issues.	0.60	$630.00
08/14/26	MRL	Call with M. Kemner, D. Goroff, and M. Moore regarding the Debtor's reply to the Committee's post-trial brief.	0.70	$560.00
08/17/26	AMUE	Communication with M. Kemner regarding privileged issue.	0.40	$490.00
08/17/26	MRL	Draft emails to the client regarding the Debtor's reply briefs to the plan objections.	0.40	$320.00
08/19/26	AMUE	Communication with client leadership on privileged matter relating to confirmation.	0.50	$612.50
08/20/26	AMUE	Communications with client leadership regarding privileged matter.	0.50	$612.50
08/20/26	AMUE	Communication with client relating to privileged matter concerning closing briefs.	0.50	$612.50
08/26/26	AMUE	Review communications with M. Kemner regarding closing argument issue.	0.50	$612.50
08/26/26	AMUE	Communications with client leadership regarding privileged issue relating to closing argument.	0.50	$612.50
08/26/26	MCM	Email correspondence with M. Kemner regarding case issues.	0.50	$525.00
08/31/26	AMUE	Communications with client leadership regarding privileged issue relating to legislation.	0.80	$980.00
		Task Total:	10.30	$11,672.50

011 Cash Management

08/03/26	AMUE	Confer with A. Bardos regarding DIP loan maturity and next draw.	0.50	$612.50
08/03/26	AMUE	Review information relating to City of Livermore Development Agreement and impact on timing and potential settlement.	0.50	$612.50
08/10/26	AMUE	Analyze cash position and DIP extension issue.	0.50	$612.50

08/20/26	AMUE	Analyze privileged issue relating to cash (.4) and communications with client regarding same (.3).	0.70	$857.50
08/21/26	AMUE	Review WIP and email to J. Prol regarding same.	0.50	$612.50
08/25/26	AMUE	Communications with J. Prol and D. Flanagan regarding WIP.	0.40	$490.00
08/27/26	AMUE	Meet with finance team regarding cash forecast (1.2); follow-up review of information relating to professional fees (.5).	1.70	$2,082.50
08/27/26	MDL	Telephone conference with VeraCruz and A. Bardos regarding projected budget under different scenarios in chapter 11 case through end of 2026.	1.20	$1,200.00
08/27/26	MRL	Attend the RCBO cash flow projections call with the Foley and client teams.	1.10	$880.00
08/27/26	SJM	Call with client, VeraCruz, and A. Uetz regarding cash forecast issues (1.1); follow-up call with client regarding cash management issues (.1).	1.20	$1,110.00
08/31/26	AMUE	Analyze updated cash forecast.	0.60	$735.00
		Task Total:	8.90	$9,805.00

016 General Case Strategy (includes team calls)

08/03/26	AMUE	Confer with E. Ridley regarding settlement negotiations in state court case.	0.50	$612.50
08/03/26	MCM	Internal email correspondence regarding case matters.	0.50	$525.00
08/05/26	MDL	Strategize regarding options for resolution with Committee.	0.30	$300.00
08/09/26	MRL	Review pending dioceses cases to provide an update on their status to client.	1.10	$880.00
08/10/26	AMUE	Analyze settlement considerations.	0.40	$490.00
08/10/26	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to client.	0.70	$560.00
08/12/26	AMUE	Analyze settlement issue.	0.40	$490.00
08/19/26	AMUE	Analyze privileged issue regarding settlement.	0.50	$612.50

08/19/26	MRL	Draft an email to the Foley team regarding current status of the Camden case.	0.20	$160.00
08/23/26	MRL	Review pending dioceses cases to provide an update on their status to client.	0.30	$240.00
08/24/26	MCM	Analysis of potential next steps following confirmation ruling (.5); email correspondence with Foley team regarding closing argument and preparation for same (.5).	1.00	$1,050.00
08/25/26	AMUE	Analyze privileged issue relating to stay.	1.10	$1,347.50
08/25/26	MRL	Review pending dioceses cases to provide an update on their status to client.	0.90	$720.00
08/27/26	AMUE	Analyze stay issue (.5) and meeting with M. Lee and M. Rofaeil regarding same (.5).	1.00	$1,225.00
08/27/26	MDL	Strategize with Foley team regarding options for staying bankruptcy case in the event confirmation is denied.	0.50	$500.00
08/27/26	MRL	Call with M. Lee and A. Uetz regarding the research on motions to stay appeal.	0.40	$320.00
08/30/26	MRL	Review pending dioceses cases to provide an update on their status to client.	0.80	$640.00
08/31/26	MRL	Continue reviewing pending dioceses cases to provide an update on their status to client.	0.50	$400.00
		Task Total:	11.10	$11,072.50

017 Hearings and Court Matters

08/05/26	SJM	Appear briefly at hearing on late-filed claim motion to confirm continuance.	0.30	$277.50
08/19/26	AMUE	Prepare for (.3) and appear at (2.2) hearing to address closing arguments.	2.50	$3,062.50
08/19/26	MCM	Prepare for (.7) and participate in (.8) portion of hearings on contested motions to allow late-filed claims and related issues.	1.50	$1,575.00
08/19/26	MRL	Attend the hearing on the motions for late-filed claims.	0.80	$640.00

08/19/26	SJM	Attend hearing on professional fee applications and late-filed claim motions.	2.20	$2,035.00
		Task Total:	7.30	$7,590.00

018 Non-Bankruptcy Litigation

08/03/26	AROU	Strategize regarding response to global settlements impacting cases with co-defendants.	1.20	$1,200.00
08/04/26	AROU	Correspond with liaison counsel for plaintiffs to meet and confer regarding plaintiff's objection to substitution of case as December 2027 bellwether trial in JCCP 5108.	0.60	$600.00
08/04/26	AROU	Strategize regarding response to plaintiff's objection to substitution of case as December 2027 bellwether trial in JCCP 5108.	1.10	$1,100.00
08/04/26	TFCA	Emails with M. Kemner regarding privileged matter (.2); emails with K. Farrar regarding same (.2); emails with A. Ouellette regarding meet and confer regarding upcoming case issue (.2).	0.60	$915.00
08/05/26	AROU	Correspond with counsel for co-defendants regarding global settlements.	0.20	$200.00
08/05/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	0.80	$800.00
08/05/26	TFCA	Review update emails from A. Uetz (.1); telephone call with M. Lee (.2).	0.30	$457.50
08/07/26	AROU	Analyze case information for claims involving RCBO which are the subject of proposed global settlements by co-defendants and anticipated good faith settlement motion.	0.50	$500.00
08/10/26	AROU	Draft motion regarding substitution of JCCP 5108 state court bellwether cases for trial.	4.80	$4,800.00
08/11/26	AROU	Correspond with plaintiff's counsel regarding plaintiff's objection to substitution of case as December 2027 bellwether trial in JCCP 5108.	0.80	$800.00
08/11/26	AROU	Draft motion regarding substitution of JCCP 5108 state court bellwether cases for trial.	5.30	$5,300.00
08/12/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	0.90	$900.00

08/14/26	AROU	Call with counsel for RCBO's insurers regarding insurers' proposal to assume defense of actions.	0.50	$500.00
08/14/26	TFCA	Review update regarding insurance issues from E. Ridley (.2); follow-up emails regarding same from S. Moses and M. Kemner (.2).	0.40	$610.00
08/19/26	AROU	Attend joint defense group call regarding abuse case litigation in California.	1.10	$1,100.00
08/19/26	AROU	Draft RCBO's insert for JCCP 5108 case management conference statement.	0.90	$900.00
08/19/26	TFCA	Review draft CMC statement and A. Ouellette's edits and respond.	0.40	$610.00
08/20/26	AROU	Strategize regarding response to agenda items as to RCBO at August 26 JCCP 5108 case management conference.	1.10	$1,100.00
08/21/26	AROU	Strategize regarding JCCP 5108 case management conference.	1.20	$1,200.00
08/21/26	SJM	Call with E. Ridley and A. Ouellette regarding preparation for JCCP status hearing regarding lift stay cases and need for estate neutrality.	0.50	$462.50
08/23/26	TFCA	Emails with M. Reck and J. Anderson regarding scheduling.	0.50	$762.50
08/26/26	AROU	Strategize regarding next steps following JCCP 5108 case management conference.	0.40	$400.00
08/26/26	AROU	Correspond with R. Simons regarding JCCP 5108 case management conference statement.	0.20	$200.00
08/26/26	SJM	Prepare for JCCP 5108 hearing regarding lift stay issues (1.2); attend hearing (1.2); email to team regarding results of hearing (.3).	2.70	$2,497.50
08/27/26	AROU	Strategize regarding next steps following JCCP 5108 case management conference.	0.30	$300.00
08/28/26	AROU	Strategize regarding next steps following JCCP 5108 case management conference.	0.40	$400.00
08/31/26	AMUE	Review communications with CNA regarding defense of state court action and discuss same with E. Ridley (.6); communication with B. Weisenberg regarding same (.4).	1.00	$1,225.00

08/31/26	TFCA	Telephone call with J. Anderson (.4); telephone call with J. Blease regarding same (.3).	0.70	$1,067.50
		Task Total:	29.40	$30,907.50

020 Retention/Billing/Fee Applications for Debtor Professionals

08/03/26	JCH	Finalize and file Verita May through June 2026 monthly fee statement.	0.50	$210.00
08/03/26	TND	Finalize Verita fee statement.	0.30	$264.00
08/05/26	SJM	Begin preparing response to fee examiner's initial report on Foley interim fee application.	2.10	$1,942.50
08/06/26	AMUE	Communications with D. Klauder regarding objections to Foley's fee application.	0.80	$980.00
08/06/26	SJM	Work on preparing response to fee examiner's initial report on Foley interim fee application.	3.40	$3,145.00
08/07/26	JCH	File stipulation and order to continue hearing in interim fee applications and upload related proposed order.	0.50	$210.00
08/12/26	JCH	Prepare and file notice of continued hearing on interim fee applications.	0.50	$210.00
08/13/26	JCH	Prepare and file certificates of no objection to Foley, A&M and NERA monthly fee statements.	0.80	$336.00
08/14/26	JCH	Prepare certificate of no objection to Verita sixth monthly fee statement.	0.50	$210.00
08/17/26	AMUE	Confer with S. Moses regarding DIP extension and manage payments to professionals.	0.40	$490.00
08/19/26	AMUE	Meeting with S. Moses to prepare for hearing on interim fee application.	0.50	$612.50
08/19/26	SJM	Prepare for hearing on interim fee applications (.8); confer with A. Uetz regarding same (.2).	1.00	$925.00
08/20/26	AMUE	Provide advice to team relating to interim fee application payments.	0.50	$612.50
08/20/26	TND	Begin preparation of information for July fee statement to ensure compliance with U.S. Trustee guidelines.	1.60	$1,408.00

08/21/26	TND	Email to team on WIP for July and question on individual matters (.1); email to K. Farrar with question on entries for July fee statement (.1).	0.20	$176.00
08/25/26	TND	Further work on Foley July fee statement to ensure compliance with U.S. Trustee guidelines.	1.60	$1,408.00
08/26/26	JCH	Prepare draft of Foley's July 2026 monthly fee statement.	0.50	$210.00
08/26/26	TND	Discussion with S. Moses on fees for state court matter (.1); further work on July fee statement to ensure compliance with U.S. Trustee guidelines (.2).	0.30	$264.00
08/27/26	JCH	Revise draft of NERA's July 2026 monthly fee statement to conform with local guidelines (.2); send file-ready copy of same to T. Dolcourt and S. Moses (.2).	0.40	$168.00
08/27/26	TND	Review NERA July fee statement (.2); email correspondence with I. Velikova on same (.1).	0.30	$264.00
08/31/26	JCH	Finalize Foley's July 2026 monthly fee statement (.5); file Foley and NERA July 2026 monthly fee statements (.2).	0.70	$294.00
08/31/26	TND	Finalize July monthly fee statement.	0.60	$528.00
		Task Total:	18.00	$14,867.50

022 Retention/Fee Applications: Other Professionals

08/04/26	SJM	Email to client regarding June professional fee statements.	0.60	$555.00
08/05/26	AMUE	Analyze monthly fee statements for Committee.	0.50	$612.50
08/05/26	SJM	Attention to possible objection to Lowenstein monthly fee application.	0.80	$740.00
08/05/26	TND	Analyze Lowenstein fee application for potential objections due to excessive time (3.3); email communications with A. Uetz regarding same (.5).	3.80	$3,344.00

08/06/26	AMUE	Multiple communications with Foley team to outline limited objection to Lowenstein's monthly fee statement (1.0) and outline research and objection relating to same (1.0).	2.00	$2,450.00
08/06/26	EPM	Review documents related to Committee fee statement objection (.1); privileged call with A. Uetz regarding fee statement objection (.4).	0.50	$475.00
08/06/26	KMF	Prepare for and attend telephone conference with attorneys regarding fee statement analysis and objections to same.	0.80	$276.00
08/06/26	SJM	Emails to parties regarding continuance of hearing on interim fee applications.	0.20	$185.00
08/06/26	TND	Work on objection to Lowenstein June 2026 fees (.5); discuss same with S. Moses (.2).	0.70	$616.00
08/07/26	EPM	Analyze reports summarizing fee statements.	0.40	$380.00
08/07/26	KMF	Perform detailed analysis of June invoices in support of drafting of objection (2.2); correspondence with attorneys regarding analysis (.4).	2.60	$897.00
08/07/26	NCW	Research to identify statements in hearing transcripts in connection with fee-related matters.	1.50	$975.00
08/07/26	SJM	Prepare stipulation and order to continue hearing on fee interim fee applications of all professionals.	0.80	$740.00
08/08/26	EPM	Begin drafting objection to Committee fee statement (.8); continue analysis of reports summarizing fee statements (3.8).	4.60	$4,370.00
08/10/26	AMUE	Meet with E. Mazzocco (.5) and finalize limited objection (1.0).	1.50	$1,837.50
08/10/26	EPM	Continue analysis of reports summarizing fee statements (1.6); call with A. Uetz regarding objection to Committee fee statement (.4); calls with K. Farrelly regarding same (.2); continue drafting objection to Lowenstein June 2026 fee statement (2.9).	5.10	$4,845.00

08/10/26	KMF	Expand analysis in support of fee objection to include trial transcripts and witness information (2.6); edits to chart in fee objection regarding specific time entries (.9); correspondence with attorneys regarding areas for renewed attention and outcomes (.6).	4.10	$1,414.50
08/12/26	EPM	Review Lowenstein June 2026 fee statement time entries.	0.60	$570.00
08/17/26	SJM	Email to client regarding payment of June 2026 fees.	0.40	$370.00
08/20/26	SJM	Prepare email to client detailing amounts approved and payable pursuant to interim fee applications.	1.20	$1,110.00
08/31/26	JCH	Prepare chart of interim payments due to all case professionals for July 2026 fee statements and email same to S. Moses.	0.50	$210.00
		Task Total:	33.20	$26,972.50

025 U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating

08/09/26	EPK	Email correspondence with D. Flanagan of VeraCruz regarding preparation of the next Rule 2015.3 report for CTN (.1); review previously filed CTN report (.1).	0.20	$200.00
08/10/26	EPK	Coordinate with D. Flanagan regarding preparation of the next CTN Rule 2015.3 report.	0.10	$100.00
08/11/26	EPK	Email correspondence with A. Bardos of RCBO and D. Flanagan of VeraCruz regarding proposed filing draft of the CTN Rule 2015.3 report and approval for filing same (.3); coordinate with J. Harrison regarding filing and service of CTN report on August 17, 2026 (.1).	0.40	$400.00
08/12/26	EPK	Follow up with J. Harrison regarding service list for the CTN Rule 2015.3 report.	0.10	$100.00

08/17/26	EPK	Email correspondence with D. Flanagan of VeraCruz regarding preliminary July 2026 MOR package (.1); review the first draft of the July 2026 MOR (.3); email correspondence with VeraCruz and RCBO team regarding comments to same (.1).	0.50	$500.00
08/18/26	EPK	Email correspondence with A. Bardos of RCBO regarding preliminary review of the July 2026 MOR.	0.10	$100.00
08/20/26	EPK	Email correspondence with A. Bardos of RCBO regarding final approval for filing of the July 2026 MOR.	0.20	$200.00
08/21/26	JCH	File July 2026 monthly operating report and circulate filed copy of same to client group.	0.50	$210.00
		Task Total:	2.10	$1,810.00

028 Tort Claims

08/04/26	KAFA	Provide detailed summary and supporting relevant documents for privileged issue for T. Carlucci.	0.80	$384.00
08/05/26	KAFA	Locate next CMC hearing date and schedule with docketing (.3); communications with A. Ouellette, S. Moses, S. Lin, E. Brown (Jilio-Ryan court reporters), and N. Jarnagin (Pizzotti & Jarnagin court reporters) regarding hearing transcripts (.8); communications with B. Portobanco regarding scan job of client documents from A. Bardos (.2); download, review and circulate new Case Anywhere filings from John Doe 117 case (.2).	1.50	$720.00
08/25/26	KAFA	Work with A. Ouellette, T. Schuman and T. Ouimet on a calendaring and docketing system for all cases set for trial.	0.90	$432.00
08/26/26	MCM	Analysis of information requests related to tort claims.	0.40	$420.00

08/31/26	KAFA	Work with Docketing and T. Schuman for coding for 5 cases going to trial (.4); communications with B. Portobanco regarding return delivery of client original documents (.3).	0.70	$336.00
		Task Total:	4.30	$2,292.00

031 Insurance Issues (coverage, includes adversary proceeding)

08/03/26	ERR	Review status of document production to insurers.	0.50	$625.00
08/03/26	ERR	Review status of pending state cases and issues regarding trial and settlement.	1.00	$1,250.00
08/03/26	MR	Coordinate further production of documents to insurers, per insurers' continuing requests (.3); review documents produced with redactions and draft supplemental redaction log for service on insurers in insurance coverage action (2.3).	2.60	$2,210.00
08/03/26	SJM	Brief review of documents for production to insurers.	0.70	$647.50
08/04/26	ERR	Attend conference call with insurers regarding supplemental briefing on motion to dismiss (.6); edit potential stipulation regarding briefing timeline (.4).	1.00	$1,250.00
08/04/26	ERR	Review insurers' draft motion seeking ability to supplement briefing on motion to dismiss given new authority from CA Supreme Court.	1.50	$1,875.00
08/04/26	MR	Continue reviewing documents produced with redactions and drafting supplemental redaction log for service on insurers in insurance coverage action.	0.50	$425.00
08/05/26	ERR	Telephone call with C. Haskett regarding coverage issues and insurer position regarding defense of state actions.	0.50	$625.00
08/05/26	ERR	Review order regarding continuance of motion to dismiss.	0.50	$625.00
08/05/26	MR	Continue review of documents produced with redactions and drafting of supplemental redaction log for service on insurers in insurance coverage action.	0.70	$595.00

08/06/26	TND	Prepare and submit further reimbursement requests from state court trial to Travelers for payment to the Debtor.	0.40	$352.00
08/07/26	TND	Email to Travelers regarding expense reimbursements.	0.10	$88.00
08/11/26	EPM	Review Westport post-confirmation trial brief (.8); call with case team to discuss response briefs to Committee's and insurers' post-confirmation trial briefs (.4).	1.20	$1,140.00
08/11/26	ERR	Review issues regarding selection of cases and potential motion regarding issue of "estate neutral" requirement.	0.50	$625.00
08/11/26	TND	Email to court reporter on outstanding invoices to be paid by Travelers.	0.10	$88.00
08/12/26	AMUE	Review communications between and among Foley and insurers relating to mediation.	0.60	$735.00
08/12/26	EPM	Review mediation privileged correspondence from insurer counsel.	0.20	$190.00
08/13/26	AMUE	Review communications between Foley and insurers relating to mediation and confer with E. Ridley regarding same.	0.50	$612.50
08/13/26	EPM	Review hard copy insurance documents for relevance.	0.80	$760.00
08/13/26	ERR	Telephone call with M. Plevin regarding documents related to issues between CNA and Travelers.	0.50	$625.00
08/13/26	ERR	Review client comments regarding insurer brief.	0.50	$625.00
08/13/26	ERR	Review proposed "joint defense agreement" by insurers.	1.00	$1,250.00
08/13/26	SJM	Call with E. Ridley and M. Plevin regarding coverage issues related to historical policies.	0.30	$277.50
08/14/26	ERR	Attend conference call with insurer representatives regarding joint defense agreement and report same to client including review of agreement.	1.50	$1,875.00
08/14/26	ERR	Review insurers' emails regarding pending settlement discussions.	0.50	$625.00

08/14/26	KAFA	Analysis of client documents for Towers Watson documentation and email to team regarding same.	0.60	$288.00
08/17/26	MR	Review insurance coverage related information requested by A. Ouelette in furtherance of privileged strategy matters for JCCP 5108 proceedings.	0.30	$255.00
08/19/26	ERR	Edit submittal for RCBO in case management statement.	0.80	$1,000.00
08/19/26	KAFA	Prepare OSC information regarding the insurers' failures related to settlement for bankruptcy filing.	0.50	$240.00
08/20/26	ERR	Telephone call with insurers regarding joint defense proposal.	0.50	$625.00
08/21/26	ERR	Review case strategy and status in preparation for up-coming case management conference in state cases.	0.50	$625.00
08/25/26	EPM	Prepare for review of potentially relevant documents.	0.30	$285.00
08/27/26	AMUE	Review communications relating to issue concerning defense of state court cases and communications with E. Ridley to form position regarding same.	1.00	$1,225.00
08/28/26	EPM	Call with E. Asfora regarding insurance document review.	0.30	$285.00
08/28/26	ERAS	Telephone conference with E. Mazzocco regarding supplemental document production.	0.40	$260.00
08/28/26	ERAS	Review internal documents for responsiveness and privilege in support of supplemental document production.	0.70	$455.00
08/28/26	ERR	Review appellate filing and brief regarding relief from stay regarding Pacific.	1.00	$1,250.00
08/30/26	ERAS	Review internal documents for responsiveness and privilege in support of supplemental document production.	2.00	$1,300.00
08/31/26	EPM	Discussions with case team regarding insurance document review.	0.20	$190.00

08/31/26	ERR	Begin preparation for final hearing (closing argument) regarding confirmation trial.	0.70	$875.00
		Task Total:	28.00	$29,153.50

032 Rule 2004 Motions/Discovery/Subpoenas

08/10/26	KAFA	Communications with B. Portobanco (Array) and D. DiFrancesco regarding loading of scanned client documents into RelOne and return of originals to client.	0.20	$96.00
08/13/26	KAFA	Management of new client documents into RelOne (.3); brief review of new client documents (.6).	0.90	$432.00
08/18/26	KAFA	Call with M. Ortega Smith regarding review of files at the Chancery for additional documents for cases now set for trial.	0.60	$288.00
08/21/26	KAFA	Emails with A. Bardos regarding collection of school records for plaintiffs with upcoming trials set.	0.80	$384.00
08/26/26	KAFA	Prepare summary of privileged information requested by M. Kemner (1.3); prepare summary of case information for matters set for trial for docketing purposes (.3); communications with L. Partington and T. Ouimet regarding same (.2).	1.80	$864.00
		Task Total:	4.30	$2,064.00

037 Financing

08/05/26	SJM	Review status of DIP financing and need for extension (1.3); call with R. Manns regarding same (.2).	1.50	$1,387.50
08/08/26	SJM	Revise DIP extension agreement (.8); email to case team regarding same (.4).	1.20	$1,110.00
08/10/26	SJM	Emails with RCC counsel regarding finalizing DIP extension (.5); email to client regarding same (.2).	0.70	$647.50

08/11/26	SJM	Call with A. Bardos regarding DIP extension (.2); email to R. Manns regarding same (.3).	0.50	$462.50
		Task Total:	3.90	$3,607.50

039 JCCP 5108 Litigation (Case No. HG19048685) – Claim No. 63

08/03/26	TFCA	Update from E. Ridley regarding settlement.	0.20	$305.00
08/04/26	JRBL	Develop settlement strategy (.8); conference with T. Carlucci regarding implementation (.6).	1.40	$2,205.00
08/05/26	AMUE	Multiple communications with client and team relating to possible settlement of litigation claim.	0.90	$1,102.50
08/05/26	ERR	Review status of settlement discussions including inquiry to insurers.	0.50	$625.00
08/06/26	ERR	Review follow-up with insurers regarding settlement negotiations as to case.	1.00	$1,250.00
08/12/26	ERR	Communication with insurers regarding pending settlement negotiations.	0.80	$1,000.00
08/13/26	ERR	Respond to emails from insurers regarding details regarding settlement negotiations.	0.50	$625.00
08/25/26	JRBL	Develop further settlement strategy.	0.50	$787.50
		Task Total:	5.80	$7,900.00

043 JCCP 5108 Litigation (Case No. 22CV023118) – Claim No. 52

08/31/26	TFCA	Review emails from A. Ouellette regarding updates (.2); review emails from J. Stein (.2); review same with R. Simons (.1).	0.50	$762.50
		Task Total:	0.50	$762.50

046 JCCP 5108 Litigation (Case No. 22CV023400) – Claim No. 230

08/12/26	AROU	Analyze plaintiff's fact sheet and discovery request responses and strategize regarding discovery plan and trial preparation.	1.90	$1,900.00
08/12/26	KAFA	Meeting with A. Ouellette to discuss discovery and next steps in preparation for trial (.5); email to A. Bardos regarding access to school records (.3).	0.80	$384.00
08/13/26	AROU	Analyze plaintiff's fact sheet and discovery request responses and strategize regarding discovery plan and trial preparation.	0.70	$700.00
08/23/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.40	$1,400.00
08/25/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	0.80	$800.00
08/26/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.30	$1,300.00
08/27/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.40	$1,400.00
08/31/26	AROU	Strategize regarding the Court's pretrial order.	0.40	$400.00
08/31/26	AROU	Strategize regarding plaintiff's document production.	0.80	$800.00
08/31/26	AROU	Strategize regarding and correspond with plaintiff's counsel regarding next steps for fact and expert discovery and trial preparation.	0.70	$700.00
08/31/26	AROU	Strategize regarding defense of action and trial preparation.	3.20	$3,200.00
08/31/26	AROU	Evaluate potential expert witness candidates.	0.90	$900.00
08/31/26	JRDO	Begin drafting memorandum assessing liability.	0.40	$270.00
08/31/26	JRDO	Strategize on drafting memorandum assessing liability.	0.30	$202.50
		Task Total:	15.00	$14,356.50

047 JCCP 5108 Litigation (Case No. 22CV022633) – Claim No. 76

08/11/26	TFCA	Review emails from A. Ouellette regarding pending litigation and respond.	0.20	$305.00
08/17/26	AROU	Analyze response from plaintiffs' liaison counsel in JCCP 5108 and counsel for plaintiff regarding excess insurer coverage issues.	0.70	$700.00
08/18/26	AROU	Draft response for JCCP 5108 case management conference to plaintiffs' liaison counsel's and counsel for plaintiff's arguments regarding excess insurer coverage issues and objections to the proposed substitution of the case as a bellwether trial.	1.60	$1,600.00
08/23/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.40	$1,400.00
08/25/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	0.80	$800.00
08/25/26	ERR	Review position of CNA regarding defense of case.	0.50	$625.00
08/26/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.30	$1,300.00
08/27/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	0.70	$700.00
08/31/26	ERR	Review letter from CNA regarding defense of case and review in context of upcoming motion.	0.70	$875.00
		Task Total:	7.90	$8,305.00

048 JCCP 5108 Litigation (Case No. 22CV020135) – Claim No. 172

08/03/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial strategy.	1.50	$1,500.00
08/03/26	AROU	Attention to defense strategy.	0.60	$600.00
08/03/26	JRDO	Continue to correspond with plaintiff's counsel on facilitating exchange of documents for discovery.	0.10	$67.50

08/04/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial strategy.	1.80	$1,800.00
08/05/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial strategy.	1.00	$1,000.00
08/06/26	KAFA	Begin to research plaintiff (.8); communications with M. Ortega Smith regarding files in the Chancery (.1).	0.90	$432.00
08/11/26	JDOR	Background check regarding plaintiff.	0.80	$240.00
08/23/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.40	$1,400.00
08/25/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	0.80	$800.00
08/26/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.30	$1,300.00
08/27/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	0.70	$700.00
		Task Total:	10.90	$9,839.50

049 JCCP 5108 Litigation (Case No. 22CV020348) – Claim No. 144

08/03/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial strategy.	1.50	$1,500.00
08/03/26	AROU	Attention to defense strategy.	0.60	$600.00
08/04/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial strategy.	1.80	$1,800.00
08/05/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial strategy.	1.00	$1,000.00
08/06/26	KAFA	Begin to research plaintiff (.8); communications with M. Ortega Smith regarding files in the Chancery (.1).	0.90	$432.00
08/11/26	JDOR	Background check regarding plaintiff.	0.80	$240.00

08/23/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.40	$1,400.00
08/25/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	0.80	$800.00
08/26/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.30	$1,300.00
08/27/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	0.70	$700.00
		Task Total:	10.80	$9,772.00

050 JCCP 5108 Litigation (Case No. 23CV030984) – Claim No. 552

08/03/26	AROU	Strategize regarding response to plaintiff's intent to state punitive damages claim.	0.80	$800.00
08/03/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial issues.	2.70	$2,700.00
08/03/26	AROU	Attention to defense strategy.	0.60	$600.00
08/04/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial issues.	3.10	$3,100.00
08/05/26	AROU	Analyze alleged perpetrator records and strategize regarding privileged trial issues.	2.20	$2,200.00
08/06/26	JDOR	Background check regarding plaintiff.	1.00	$300.00
08/06/26	KAFA	Finalize plaintiff research (.9); email A. Ouellette summary of same (.3).	1.20	$576.00
08/10/26	AROU	Strategize regarding background research regarding plaintiff in furtherance of evaluation of claim.	0.50	$500.00
08/23/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.40	$1,400.00
08/25/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	0.80	$800.00

08/25/26	KAFA	Review of notice of adoption form, authorizations, plaintiff's fact sheet, and plaintiff's discovery requests to RCBO (special interrogatories, form interrogatories, and RFP's).	1.20	$576.00
08/26/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	1.30	$1,300.00
08/27/26	AROU	Strategize regarding defense of action and analysis of alleged perpetrator and plaintiff's allegations.	0.70	$700.00
08/27/26	KAFA	Review of additional discovery served via CaseAnywhere.	0.60	$288.00
		Task Total:	18.10	$15,840.00

051 JCCP 5108 Litigation (Case No. 22CV018558) – Claim No. 486

08/26/26	JRDO	Correspond with plaintiff's counsel on meeting and conferring for discovery.	0.30	$202.50
08/28/26	JRDO	Continue to correspond with plaintiff's counsel on meeting and conferring for discovery.	0.20	$135.00
		Task Total:	0.50	$337.50
		Services Total:	669.60	$659,483.50

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Eloise R. Asfora	ERAS	Associate	3.10	$650.00	$2,015.00
Jack R. Doti	JRDO	Associate	1.30	$675.00	$877.50
Mason Roberts	MR	Associate	4.10	$850.00	$3,485.00
Mary Rofaeil	MRL	Associate	76.50	$800.00	$61,200.00
Nathan C. Walsh	NCW	Associate	8.90	$650.00	$5,785.00
Nora McGuffey	NMCG	Associate	43.70	$825.00	$36,052.50
Shane J. Moses	SJM	Of Counsel	97.50	$925.00	$90,187.50
Jack Dorr	JDOR	Other	3.80	$300.00	$1,140.00
Janelle C. Harrison	JCH	Paralegal	21.70	$420.00	$9,114.00
Kerry A. Farrar	KAFA	Paralegal	14.90	$480.00	$7,152.00

Kathleen M. Farrelly	KMF	Paralegal	7.50	$345.00	$2,587.50
Ann Marie Uetz	AMUE	Partner	92.40	$1,225.00	$113,190.00
Alan R. Ouellette	AROU	Partner	75.00	$1,000.00	$75,000.00
David B. Goroff	DBG	Partner	52.00	$1,450.00	$75,400.00
Emil P. Khatchatourian	EPK	Partner	1.60	$1,000.00	$1,600.00
Eileen R. Ridley	ERR	Partner	29.10	$1,250.00	$36,375.00
Jeff R. Blease	JRBL	Partner	1.90	$1,575.00	$2,992.50
Mark C. Moore	MCM	Partner	44.80	$1,050.00	$47,040.00
Matthew D. Lee	MDL	Partner	31.30	$1,000.00	$31,300.00
Thomas F. Carlucci	TFCA	Partner	3.80	$1,525.00	$5,795.00
Elizabeth P. Mazzocco	EPM	Senior Counsel	43.70	$950.00	$41,515.00
Tamar N. Dolcourt	TND	Special Counsel	11.00	$880.00	$9,680.00
Totals			**669.60**		**$659,483.50**

Expenses Incurred

Description	**Amount**
Depositions / Transcripts, Exams	($6,198.20)
Electronic Legal Research Services	$476.06
LSS - eDiscovery Services	$14,200.00
Other Expenses	$720.38
Other Fees	$3.00
Recording / Filing Fees	$222.53
Service Fees	$40.00
Transportation / Travel Expenses	$109.00
Expenses Incurred Total	**$9,572.77**

Certain services and expenses, which involve payments made to third parties, include an additional charge based upon our internal costs with respect to those services and expenses.

Expense Detail

Depositions / Transcripts, Exams

Date	Initials	Description	Amount
03/03/26	JRBL	Reversed on 9/16/2026. Steno Agency - Transcript of the deposition of Jennifer Keller PhD conducted on 2/26/26 - 03/03/26.	($3,071.54)
03/03/26	JRBL	Reversed on 9/16/2026. Steno Agency - Transcript of deposition conducted 2/24/26 - 03/03/26.	($1,510.56)
03/09/26	JRBL	Reversed on 9/16/2026. Steno Agency - Transcript of hearing conducted on 3/5/26, Alameda Superior Court - 03/09/26.	($1,691.50)
08/25/26	JRBL	Janice Russell - Transcript: Hearing Held 8/19/26 - 08/25/26.	$75.40
			($6,198.20)

Electronic Legal Research Services

Date	Initials	Description	Amount
08/31/26	SJM	DOCKET REPORT. LEXIS PUBLIC RECORDS LEVEL 1 SEARCH.	$476.06

CONTEXT EXPERT REPORT.

LSS - eDiscovery Services

Date	Initials	Description	Amount
08/31/26	JRBL	LSS - eDiscovery Services.	$14,200.00

Other Expenses

Date	Initials	Description	Amount
08/13/26	NFAR	Miscellaneous--VENDOR: U.S. BANK 08/13/26 Document retrieval - article - Nora McGuffrey.	$214.00
08/31/26	JRBL	Omni-Invictus, LLC - Scanning services - 08/31/26.	$506.38
			$720.38

Other Fees

Date	Initials	Description	Amount
08/31/26	MDL	Other Fees--VENDOR: U.S. BANK 08/06/26 Minute order retrieval fee.	$3.00

Recording / Filing Fees

Date	Initials	Description	Amount
07/10/26	JRBL	ACE ATTORNEY SERVICE, INC. - efiling, chamber copy - 07/10/26.	$222.53

Service Fees

Date	Initials	Description	Amount
08/01/26	JRBL	CASE ANYWHERE, LLC - System Access Fee - 08/01/26.	$40.00

Transportation / Travel Expenses

Date	Initials	Description	Amount
08/30/26	MRL	Train--VENDOR: Mary Rofaeil - Visit to Chicago office for client meeting. - Detroit to Chicago.	$109.00

Expense Total: $9,572.77