FOLEY & LARDNER LLP
Eileen R. Ridley (CA Bar No. 151735)
Tel: (415) 438-6469; eridley@foley.com
Shane J. Moses (CA Bar No. 250533)
Tel: (415) 438-6404; smoses@foley.com
Ann Marie Uetz (admitted *pro hac vice*)
Tel: (313) 234-7114; auetz@foley.com
Matthew D. Lee (admitted *pro hac vice*)
Tel: (608) 258-4203; mdlee@foley.com
Geoffrey S. Goodman (*pro hac vice* requested)
Tel: (312) 832-4515; ggoodman@foley.com
Mark C. Moore (admitted *pro hac vice*)
Tel: (214) 999-4150; mmoore@foley.com
One Market Plaza
55 Spear Street Tower, Suite 1900
San Francisco, CA 94105

Counsel for the Debtor
and Debtor in Possession

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

THIRD INTERIM FEE APPLICATION OF HILCO REAL ESTATE, LLC AS REAL ESTATE CONSULTANT FOR ALLOWANCE AND PAYMENT OF COMPENSATION 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. Pacific Time
Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

Objection Deadline: November 20, 2026

Name of Applicant:	Hilco Real Estate, LLC
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:	$39,100.00
Total expenses sought this period:	$10,328.63
Petition date:	May 8, 2023
Retention date:	January 21, 2025
Date of order approving employment:	March 18, 2025 [Docket No. 1836]
Total fees approved by interim order to date:	$280,733.00
Total expenses approved by interim order to date:	$12,379.24
Total allowed fees paid to date:	$261,333.00
Total allowed expenses paid to date:	$12,379.24
Blended rate in this application for all attorneys:	N/A
Blended rate in this application for all timekeepers:	$650.00
Fees sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	$0
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	$0
Number of professionals included in this application:	2
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals billing fewer than 15 hours to the case during this period:	0
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:	N/A
Interim or Final:	Interim

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SUMMARY OF MONTHLY FEE STATEMENTS FOR THE INTERIM FEE PERIOD

Summary of Any Monthly Fee Statements for the Interim Fee Period: **No monthly fee statements were filed for the interim fee period covered by this application.**

Summary of Any Objections to Monthly Fee Statements: **N/A**

Total Compensation and Expenses Sought in this Interim Application and Not Yet Paid: Fees in the amount of **$39,100.00** and expenses in the amount of **$10,328.63**.

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INTRODUCTION

Hilco Real Estate, LLC ("Hilco") as court-appointed real estate consultant to The Roman Catholic Bishop of Oakland, a California corporation, and the debtor and debtor-in-possession (the "Debtor" or "RCBO"), respectfully submits this third interim application for allowance of compensation (the "Interim Application") for services performed for 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").

Hilco seeks interim approval of its fees and expenses incurred during the Interim Fee Period totaling $49,428.63. This sum represents compensation for the total of 54 hours spent by Hilco for real estate services provided to the Debtor and $10,328.63 in out-of-pocket expenses.

Hilco has received no payments for services during the Interim Fee Period and therefore now requests $49,428.63 be paid to Hilco.

This Interim Application is based upon the contents hereof. Attached as **Exhibit A** are time records detailing the amount of fees charged and hours worked by Hilco during the Interim Fee Period.

BACKGROUND

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 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

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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.

Employment of Hilco

On March 7, 2025 the Debtor's filed the *Debtor's Application for Order Authorizing Employment of Hilco Real Estate, LLC as Real Estate Consultant Pursuant to 11 U.S.C. § 327* [Docket No. 1808] (the "Hilco Application"). On March 18, 2025, the Court entered an order approving the Hilco Application effective as of January 21, 2025 [Docket No. 1836].

Summary of Real Estate Services

During the relevant period of this application, Hilco's time was devoted to providing real estate valuation services to the Debtor, including the analysis and valuation of the Debtor's real property and providing expert testimony in support thereof. In particular, Hilco spent time meeting with the Debtor regarding the scope of the valuation services, attending and preparing for court hearings, and presenting expert testimony regarding the market value and liquidation value of the subject real property.

REIMBURSEMENT OF EXPENSES

This application seeks reimbursement of out-of-pocket expenses of $10,328.63 arising from travel, lodging, meals, and transportation.

COMPLIANCE WITH GUIDELINES

Hourly Rates

The names and positions of the Hilco professionals who have provided services to the Debtor during the Interim Fee Period are listed below with each such professional's hourly rate.

Professional	Title	Hourly Rate
Adam Zimmerman	Senior Director	$650.00
John Satter	Senior Director	$650.00

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Client Review of Billing Statements

Pursuant to the Northern District Guidelines, an email enclosing this Interim Application is being sent to the Debtor. This email will include the language required by the Guidelines, inviting the Debtor to discuss with Hilco 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.

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.

No Agreements to Share Compensation

Hilco has no agreement or understanding of any kind or nature to divide, pay over, or share any portion of the fees to be awarded to it with any other person or attorney.

CONCLUSION

Hilco believes that the services rendered for which compensation is sought in this Interim Application have been beneficial to the estate and that the sums requested for the services rendered are fair and reasonable.

WHEREFORE, Hilco respectfully requests that the Court make an award interim to Hilco in the amount of $49,428.63 inclusive of all fees and costs for the period from May 1, 2026 through August 31, 2026.

//

//

DATED: October 30, 2026

HILCO REAL ESTATE, LLC

/s/ Eric W. Kaup
Eric W. Kaup
Authorized Signatory
Hilco Real Estate, LLC

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Exhibit A

Hilco Valuation Services

Remit to:
Hilco Valuation Services, LLC
5 Revere Dr Suite 300
Northbrook, IL 60062

INVOICE

Invoice: CINV-25839
Date: 10/27/2026
Terms: Net 30

Foley & Lardner LLP
Matt Lee
150 East Gilman Street, Suite 5000
Madison, WI 53703
United States of America
mdlee@foley.com

RE:Litigation Support - May and June 2026 The Roman Catholic Bishop of Oakland (RCBO)

Description	Amount
Out-of-Pocket Expenses	10,328.63
Services Rendered	39,100.00
Total	**49,428.63**
Open Amount Due (USD)	**$49,428.63**

Effective May 1, 2026, we will no longer accept check payments for invoice settlement. Accepted payment methods are **ACH (EFT)** or **wire transfer.**

ACH Instructions

Account Name: Hilco Valuation Services, LLC (BofA)
Bank: Bank of America
Routing #: 071000039
Account #: 8670329211
SWIFT Code: BOFAUS3N
Reference: CINV-25839

Wire Instructions

Account Name: Hilco Valuation Services, LLC (BofA)
Bank: Bank of America
Routing #: 026009593
Account #: 8670329211
SWIFT Code: BOFAUS3N
Reference: CINV-25839

Roman Catholic Bishop of Oakland HRE Time Log			
Date	Person	Task Description	Time Spent (Hours)
5/5/2026	Adam Zimmerman	Meetings with Foley regarding scope of work and property overview	2.0
5/6/2026	Adam Zimmerman	Meetings with Foley regarding scope of work and property overview	2.0
5/7/2026	Adam Zimmerman	Meetings with Foley regarding scope of work and property overview	2.0
6/17/2026	Adam Zimmerman	Reviewed Liquidation Report	1.0
6/18/2026	Adam Zimmerman	Call w/ Foley in anticipation of expert testimony	1.5
6/18/2026	Adam Zimmerman	Transcript Review - Chuck Moore FTI	1.0
6/22/2026	Adam Zimmerman	Attend Trail & Testimony Preparation	8.0
6/23/2026	Adam Zimmerman	Attend Trail & present Expert Testimony	4.0
6/26/2026	Adam Zimmerman	Read Day Four Transcript at request of Foley	1.0
6/29/2026	Adam Zimmerman	Attended Trail via Zoom	3.0

Roman Catholic Bishop of Oakland HRA Time Log (John Satter)			
Date	Person	Task Description	Time Spent (Hours)
6/17/2026	John Satter	Reviewed RCBO Report	1.5
6/18/2026	John Satter	Reviewed Stout Reports (2025)	1.5
6/18/2026	John Satter	Call w/ Foley in anticipation of expert testimony	1.5
6/18/2026	John Satter	Reviewed work file/Stout 2026	2.0
6/18/2026	John Satter	Transcript Review - Transcript Day One	2.0
6/19/2026	John Satter	Transcript Review -Rosen Deposition Transcript	1.5
6/22/2026	John Satter	Attend Trail & Testimony Preparation	8.0
6/23/2026	John Satter	Attend Trail & present Expert Testimony	4.0
6/26/2026	John Satter	Read Day Four Transcript at request of Foley	2.5
6/29/2026	John Satter	Attended Trail via Zoom	4.0

Summary of Hourly Billing			
Person	Number of Hours	Per Hour Fee	Total Fee
Jeff Azuse	0	$800	$0
Matt Mason	0	$765	$0
Adam Zimmerman	25.5	$650	$16,575
Chris Parthum	0.0	$400	$0
John Satter	28.5	$650	$18,525
Total	**54**		**$35,100**

Summary of Travel Day Fees			
Person	Travel	Dates	Total Fee
Adam Zimmerman	ORD - SFO (RT)	6/22-6/24	$2,000
John Satter	ORD - SFO (RT)	6/22-6/24	$2,000
Total			**$4,000**

TOTAL FEE	
Person	Total Fee
Adam Zimmerman	$18,575
John Satter	$20,525
Total	**$39,100**

Summary of Travel Reimbursements	
Person	Total Fee
Adam Zimmerman	$5,937
John Satter	$4,392
Total	**$10,329**

Adam Zimmerman Expenses

Airfare	$	2,505.07	
American Taxi	$	70.00	Home to Airport
Hotel	$	3,252.31	
Waymo	$	14.04	Foley office to Hotel
Dinner	$	25.20	
American Taxi	$	70.00	Airport to Home
Total Expenses	**$**	**5,936.62**	

John Satter Expenses

Airfare	$	2,036.79	
Hotel	$	2,008.41	
Uber	$	54.94	Airport to Hotel
Uber	$	45.64	Hotel to Court Monday
Uber	$	59.98	Hotel to Court Tuesday
Uber	$	57.99	Court to Hotel
Breakfast	$	5.25	
Dinner	$	69.07	Dinner with A. Zimmerman
Uber	$	53.94	Hotel to Airport
Total Expenses	**$**	**4,392.01**	