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Counsel for the Official Committee of Unsecured Creditors

**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

**MONTHLY PROFESSIONAL FEE
STATEMENT FOR BURNS BAIR LLP
[MARCH 2024]**

TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:

1 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP (“**Burns Bair**”), special insurance
2 counsel to The Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman
3 Catholic Bishop of Oakland (the “**Debtor**”), hereby files its Monthly Professional Fee Statement
4 for the Period of March 1, 2024 through March 31, 2024 (the “**Monthly Fee Statement**”). Pursuant
5 to the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses
6 of Professionals [Dkt. 170] (the “**Interim Fee Order**”)¹ entered by the Court on June 23, 2023,
7 the total legal fees and costs expended by Burns Bair on account of the Committee for the period
8 of March 1, 2024 through March 31, 2024, is as follows:

Period	Fees	Expenses	Total
March 1, 2024 – March 31, 2024	\$117,816.00	\$3,161.42	\$120,977.42
Net Total Allowed Payments this Statement Period: (80% of Fees and 100% of Costs)	\$94,252.80	\$3,161.42	\$97,414.22

14 The itemized billing statement for the fees and costs billed is attached hereto as **Exhibit**
15 **A**. Notice Parties have ten (10) days from the date of service of this Monthly Fee Statement to
16 file an objection thereto. If no objection is filed, Burns Bair may file a certificate of no objection
17 (or if an Objection was timely served, a certificate of partial objection) with the Court after which
18 the Debtor, without further order of the Court, shall pay Burns Bair an amount equal to the lesser
19 of: (1) 80% of the fees and 100% of the expenses requested in the Monthly Fee Statement, and
20 (2) if an Objection was served, 80% of the fees and 100% of the expenses to which there was no
21 Objection no later than five (5) business days after the filing of the relevant certificate.

22 Dated: April 30, 2024

BURNS BAIR LLP

23 By: Jesse J. Bair
24 Jesse J. Bair
25 *Special Insurance Counsel for the Official*
26 *Committee of Unsecured Creditors*

27 _____
28 ¹ Capitalized terms not otherwise defined shall have the meaning ascribed to them in the Interim Fee Order.

EXHIBIT A

Burns | Bair

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

The Roman Catholic Bishop of Oakland UCC

Issue Date : 4/30/2024

Bill # : 01404

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/1/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re mediation strategy (.5);	0.50	\$450.00
3/12/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation strategy and draft term sheet (1.2);	1.20	\$1,080.00
3/12/2024	Timothy Burns	Participate in state court counsel meeting re mediation and insurance issues (1.2);	1.20	\$1,344.00
3/28/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes (1.0);	1.00	\$1,120.00
Totals for Committee Meetings			3.90	\$3,994.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/19/2024	Jesse Bair	Prepare for hearing re interim professional fee applications (.3);	0.30	\$270.00
3/20/2024	Jesse Bair	Correspond with the Debtor re omnibus order approving professional fees (.1);	0.10	\$90.00
3/28/2024	Jesse Bair	Analysis of Burns Bair invoice for privilege and confidential information (.4);	0.40	\$360.00
3/28/2024	Brenda Horn-Edwards	Draft Burns Bair monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
3/28/2024	Jesse Bair	Correspond with B. Horn re Burns Bair monthly fee submission (.1);	0.10	\$90.00
3/29/2024	Jesse Bair	Edit and finalize Burns Bair's monthly fee application, including correspondence with G. Albert re same (.2);	0.20	\$180.00
Totals for Fee Applications			1.40	\$1,092.00

Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/19/2024	Jesse Bair	Participate in hearing re interim professional fee applications (.9);	0.90	\$810.00
3/21/2024	Timothy Burns	Review 3/19/24 hearing transcript re hearing in main case (.3);	0.30	\$336.00
Totals for Hearings			1.20	\$1,146.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/1/2024	Jesse Bair	Brief review re CNA's Rule 2004 written responses and objections (.2);	0.20	\$180.00
3/1/2024	Jesse Bair	Review correspondence from American Home re objections to the Committee's Rule 2004 subpoena (.1);	0.10	\$90.00
3/1/2024	Jesse Bair	Review Travelers correspondence re Travelers' upcoming Rule 2004 production (.1);	0.10	\$90.00
3/1/2024	Jesse Bair	Brief review re Chubb's Rule 2004 written responses and objections (.1);	0.10	\$90.00
3/1/2024	Timothy Burns	Review correspondence with Lowenstein and insurer counsel re document production issues (.1);	0.10	\$112.00
3/1/2024	Jesse Bair	Prepare for Committee meeting re mediation strategy (.2);	0.20	\$180.00
3/2/2024	Jesse Bair	Review California case law re non-admitted insurers and bond-posting requirements under Cal. Insurance Section 1616 and brief review re California admitted insurers list (.1);	0.10	\$90.00
3/2/2024	Timothy Burns	Review and draft response to American Home re its compliance with the Committee's Rule 2004 requests and circulate same to Lowenstein (.5);	0.50	\$560.00
3/2/2024	Timothy Burns	Review the Committee's Response to LMI's Motion to Shorten Time re LMI's Motion for Stay Pending Appeal re the Rule 2004 Order (.1);	0.10	\$112.00
3/2/2024	Timothy Burns	Review and respond to follow up correspondence from C. Restel re draft response to American Home re Rule 2004 compliance (.1);	0.10	\$112.00
3/2/2024	Jesse Bair	Review and consider various correspondence with American Home, Lowenstein, and T. Burns re American Home's Rule 2004 subpoena objection and the Committee's response to same (.2);	0.20	\$180.00

3/2/2024	Jesse Bair	Review correspondence with C. Restel and LMI re hearing date on LMI's motion to shorten time (.1);	0.10	\$90.00
3/2/2024	Timothy Burns	Provide instructions to A. Turgeon re historical debtor policies organization project (.2);	0.20	\$224.00
3/2/2024	Timothy Burns	Review correspondence with LMI and Lowenstein re hearing on LMI's ex parte motion to shorten time (.2);	0.20	\$224.00
3/3/2024	Timothy Burns	Review materials re sexual abuse case consolidation for trial received from state court counsel in connection with potential insurance strategies in case (.8);	0.80	\$896.00
3/4/2024	Alyssa Turgeon	Organize and index debtor historical insurance policy collection (1.9);	1.90	\$646.00
3/4/2024	Nathan Kuenzi	Research issues relating to LMI and discovery of materials allegedly held by the London brokers in connection with LMI's Rule 2004 objections (3.1); draft email memorandum for J. Bair and T. Burns summarizing research results (.7);	3.80	\$2,090.00
3/4/2024	Jesse Bair	Review correspondence from CNA, Travelers, Chubb, and LMI re Rule 2004 document productions and correspond with BB team re review of same (.2); correspondence with C. Restel re same (.1);	0.30	\$270.00
3/4/2024	Nathan Kuenzi	Analyze insurance coverage during CNA and LMI periods in connection with insurance exposure analysis (.3);	0.30	\$165.00
3/4/2024	Jesse Bair	Review American Home correspondence re Rule 2004 objections (.1);	0.10	\$90.00
3/4/2024	Timothy Burns	Review additional correspondence with LMI and C. Restel re LMI's hearing on Motion to Shorten (.1);	0.10	\$112.00
3/4/2024	Timothy Burns	Review correspondence from American Home re scope of discovery (.1);	0.10	\$112.00
3/4/2024	Jesse Bair	Provide supplemental instructions to K. Jonch-Clausen re research needed re California Insurance Section 1616 (.1);	0.10	\$90.00
3/4/2024	Karin Jonch-Clausen	Research and analyze case law re non-admitted insurers, California Insurance Code Section 1616, and bond-posting requirements in connection with same, with particular focus on foreign entities such as LMI (3.2);	3.20	\$1,760.00
3/4/2024	Timothy Burns	Review N. Kuenzi's legal research memo re LMI discovery issues in connection with London brokers (.2);	0.20	\$224.00

3/5/2024	Timothy Burns	Review correspondence from Chubb re Chubb's Rule 2004 document production (.1); review correspondence with the Committee professionals re the insurers' document productions (.1);	0.20	\$224.00
3/5/2024	Timothy Burns	Review LMI's letter re motion to quash (.1);	0.10	\$112.00
3/5/2024	Jesse Bair	Review and edit draft insurance term sheet request for use in mediation (.8);	0.80	\$720.00
3/5/2024	Nathan Kuenzi	Conduct first-level review of insurance documents recently produced by CNA in response to the Committee's Rule 2004 requests (1.1);	1.10	\$605.00
3/5/2024	Timothy Burns	Review American Home's motion for protective order (.2);	0.20	\$224.00
3/5/2024	Jesse Bair	Review the Debtor's draft opposition to CIGA's motion to dismiss (.3); correspondence with the Debtor re same and Committee joinder (.1);	0.40	\$360.00
3/5/2024	Alyssa Turgeon	Continue organizing and indexing debtor historical insurance policy collection (2.2);	2.20	\$748.00
3/5/2024	Timothy Burns	Review correspondence with LMI and Lowenstein re briefing schedule re LMI's motion for protective order (.1);	0.10	\$112.00
3/5/2024	Timothy Burns	Review LMI document production while formulating partial summary judgment strategy based on reservations of rights made by LMI (2.3);	2.30	\$2,576.00
3/5/2024	Timothy Burns	Review correspondence with LMI and Lowenstein re LMI's motion to quash (.1);	0.10	\$112.00
3/5/2024	Brian Cawley	Participate in conference with J. Bair and BB team re insurance Rule 2004 first-level document review project (.3);	0.30	\$165.00
3/5/2024	Karin Jonch-Clausen	Conduct first-level review of insurance documents recently produced by CNA in response to the Committee's Rule 2004 requests (1.8);	1.80	\$990.00
3/5/2024	Jesse Bair	Review and edit the Committee's draft opposition to LMI's motion to stay Rule 2004 Order pending appeal (.4); review correspondence with C. Restel and T. Burns re suggested additional edits to same (.1);	0.50	\$450.00
3/5/2024	Brian Cawley	Conduct first-level review of insurance documents recently produced by Westport in response to the Committee's Rule 2004 requests (2.8);	2.80	\$1,540.00
3/5/2024	Karin Jonch-Clausen	Conduct first-level review of insurance documents recently produced by Travelers in response to the Committee's Rule 2004 requests (1.6);	1.60	\$880.00

3/5/2024	Timothy Burns	Review J. Bair's suggested edits to the Committee's opposition to LMI's motion to stay and related correspondence with J. Bair and C. Restel re same (.2);	0.20	\$224.00
3/5/2024	Nathan Kuenzi	Participate in additional conference with J. Bair re first level review of the insurers' Rule 2004 document productions (.2);	0.20	\$110.00
3/5/2024	Timothy Burns	Correspondence with Lowenstein and Burns Bair team re LMI's reservation of rights letter analysis (.2);	0.20	\$224.00
3/5/2024	Timothy Burns	Participate in call with J. Bair re Committee joinder in debtor's opposition to CIGA motion to dismiss (.1); review correspondence with Committee professionals re same (.1);	0.20	\$224.00
3/5/2024	Timothy Burns	Review correspondence from B. Weisenberg re mediation plan term sheet (.2);	0.20	\$224.00
3/5/2024	Jesse Bair	Draft the Committee's joinder to the Debtor's opposition to CIGA's motion to dismiss and email G. Albert re same (.2);	0.20	\$180.00
3/5/2024	Karin Jonch-Clausen	Participate in conference with J. Bair and BB team re insurance Rule 2004 first-level document review project (.3);	0.30	\$165.00
3/5/2024	Timothy Burns	Brief review re N. Kuenzi's summary of the insurers' recent Rule 2004 document productions (.2);	0.20	\$224.00
3/5/2024	Timothy Burns	Review additional correspondence from B. Weisenberg re mediation plan term sheet issues (.1);	0.10	\$112.00
3/5/2024	Timothy Burns	Review and revise the Committee's response to LMI's motion for stay pending appeal (.6);	0.60	\$672.00
3/5/2024	Karin Jonch-Clausen	Conduct first-level review of insurance documents recently produced by Chubb in response to the Committee's Rule 2004 requests (3.5);	3.50	\$1,925.00
3/5/2024	Timothy Burns	Review and revise draft term sheet for upcoming mediation session (.5);	0.50	\$560.00
3/5/2024	Jesse Bair	Review correspondence from Westport and Chubb re their Rule 2004 productions (.1);	0.10	\$90.00
3/5/2024	Nathan Kuenzi	Conduct first-level review of insurance documents recently produced by Travelers in response to the Committee's Rule 2004 requests (.3);	0.30	\$165.00
3/5/2024	Timothy Burns	Correspondence with Lowenstein and J. Bair re strategic issues relating to upcoming mediation (.2);	0.20	\$224.00

3/5/2024	Timothy Burns	Analysis of overall case strategy and insurance strategy in connection with preparations for upcoming mediation session (2.7);	2.70	\$3,024.00
3/5/2024	Brian Cawley	Conduct first-level review of insurance documents recently produced by Chubb and CNA in response to the Committee's Rule 2004 requests (2.1);	2.10	\$1,155.00
3/5/2024	Jesse Bair	Participate in call with Lowenstein and T. Burns re draft insurance term sheet and mediation strategy (.7);	0.70	\$630.00
3/5/2024	Timothy Burns	Prepare for call with Lowenstein and J. Bair re draft plan term sheet and mediation issues (.2); participate in post-call with J. Bair re follow-up tasks in connection with same (.2);	0.40	\$448.00
3/5/2024	Jesse Bair	Participate in additional conference with N. Kuenzi re initial review of the insurers' Rule 2004 document productions (.2);	0.20	\$180.00
3/5/2024	Timothy Burns	Review correspondence with LMI and Lowenstein re production issues in connection with Rule 2004 subpoena (.1);	0.10	\$112.00
3/5/2024	Timothy Burns	Review and analyze LMI's motion for protective order (.5);	0.50	\$560.00
3/5/2024	Nathan Kuenzi	Conduct first-level review of insurance documents recently produced by LMI in response to the Committee's Rule 2004 requests (1.3);	1.30	\$715.00
3/5/2024	Nathan Kuenzi	Participate in conference with J. Bair and BB team re insurance Rule 2004 first-level document review project (.3);	0.30	\$165.00
3/5/2024	Jesse Bair	Participate in call with T. Burns re potential additional changes to the draft term sheet (.2);	0.20	\$180.00
3/5/2024	Jesse Bair	Analysis re parameters and structure for first level review of the carriers' rule 2004 production (.2); provide instructions to BB team re same (.3);	0.50	\$450.00
3/5/2024	Jesse Bair	Review and respond to correspondence with Westport and Lowenstein re discovery meet and confer (.1);	0.10	\$90.00
3/5/2024	Nathan Kuenzi	Conduct first-level review of insurance documents recently produced by Chubb in response to the Committee's Rule 2004 requests (3.4);	3.40	\$1,870.00
3/5/2024	Nathan Kuenzi	Draft summary of first level review of all insurer Rule 2004 productions received to date (1.9);	1.90	\$1,045.00
3/5/2024	Timothy Burns	Participate in call with Lowenstein and J. Bair re draft insurance term sheet and mediation strategy (.7);	0.70	\$784.00

3/6/2024	Timothy Burns	Prepare for upcoming mediation session, with focus on insurance strategy and draft term sheet (.5);	0.50	\$560.00
3/6/2024	Timothy Burns	Correspondence with B. Weisenberg re changes to draft term sheet for mediation (.2);	0.20	\$224.00
3/6/2024	Jesse Bair	Analyze summary of first level review of the insurers' Rule 2004 productions (.3); correspond with Lowenstein re same (.1);	0.40	\$360.00
3/6/2024	Jesse Bair	Review C. Restel email memo re status of all LMI Rule 2004-related motions and objections (.1);	0.10	\$90.00
3/6/2024	Jesse Bair	Review and respond to additional correspondence with Westport re discovery meet and confer (.1);	0.10	\$90.00
3/6/2024	Jesse Bair	Review T. Burns email memo re case insurance mediation strategy (.1);	0.10	\$90.00
3/6/2024	Jesse Bair	Review correspondence with CNA and the Debtor re motion to dismiss briefing issues (.1);	0.10	\$90.00
3/7/2024	Jesse Bair	Review and consider T. Burns email memo re potential alternative Plan term sheet structure (.2);	0.20	\$180.00
3/7/2024	Timothy Burns	Draft email memo re potential alternative Plan term sheet structure, with particular focus on case insurance issues (1.2);	1.20	\$1,344.00
3/7/2024	Jesse Bair	Correspond with the Debtor re motion to dismiss issues (.1);	0.10	\$90.00
3/7/2024	Jesse Bair	Review and respond to correspondence with B. Weisenberg re upcoming mediation session (.1);	0.10	\$90.00
3/8/2024	Jesse Bair	Participate in call with M. Kaplan re outcome of Rule 2004 meet and confer and next-steps in response to same (.2);	0.20	\$180.00
3/8/2024	Jesse Bair	Participate in discovery meet and confer with Westport and Lowenstein (.5);	0.50	\$450.00
3/8/2024	Timothy Burns	Review stipulation to shorten time and related filings (.1);	0.10	\$112.00
3/8/2024	Jesse Bair	Review revised draft term sheet circulated by B. Wiesenberg in advance of mediation (.2);	0.20	\$180.00
3/8/2024	Jesse Bair	Prepare for discovery meet and confer with Westport (.1);	0.10	\$90.00
3/8/2024	Timothy Burns	Continue preparing for upcoming mediation session, with focus on insurance strategy and draft term sheet (.6);	0.60	\$672.00
3/8/2024	Timothy Burns	Review and revise the Committee's objection to LMI's motion for leave to appeal (.9);	0.90	\$1,008.00

3/9/2024	Jesse Bair	Review Chubb letter to the Committee re Chubb's Rule 2004 production and related correspondence with M. Kaplan re same (.1);	0.10	\$90.00
3/9/2024	Jesse Bair	Review K. Jonch-Clausen's email memo re case law in connection with the insurers' privilege and confidentiality discovery objections (.2);	0.20	\$180.00
3/9/2024	Jesse Bair	Brief review re Chubb's categorical privilege log (.1);	0.10	\$90.00
3/9/2024	Jesse Bair	Review and respond to correspondence with the Debtor re oppositions to the insurers' motions to dismiss (.1);	0.10	\$90.00
3/10/2024	Nathan Kuenzi	Review and analyze Chubb privilege log (.3);	0.30	\$165.00
3/10/2024	Jesse Bair	Review N. Kuenzi email memo re discoverability of London Broker research and brief review of case law cited therein (.2);	0.20	\$180.00
3/10/2024	Timothy Burns	Review correspondence with debtor's and insurers' counsel re motion to dismiss briefing and hearing (.1);	0.10	\$112.00
3/10/2024	Timothy Burns	Review Chubb's document production letter (.1); brief review review re Chubb's categorical privilege log and correspond with J. Bair re potential response to same (.2);	0.30	\$336.00
3/11/2024	Timothy Burns	Review correspondence from LMI re hearing on LMI's various 2004-related motions (.1);	0.10	\$112.00
3/11/2024	Jesse Bair	Participate in conference with T. Burns re mediation and Plan term-sheet strategy (.4);	0.40	\$360.00
3/11/2024	Karin Jonch-Clausen	Research California case law and statutes re direct action insurance rights and parameters of same (1.3); draft email memo summarizing research re same (.2);	1.50	\$825.00
3/11/2024	Jesse Bair	Review various correspondence with LMI re hearing issues on LMI's numerous Rule 2004-related motions (.1);	0.10	\$90.00
3/11/2024	Karin Jonch-Clausen	Analyze and draft summary of POCs alleging abuse during uninsured or underinsured periods of the Debtor's coverage program (3.1);	3.10	\$1,705.00
3/11/2024	Jesse Bair	Participate in conference with BB team re case status and related insurance projects (.3);	0.30	\$270.00

3/11/2024	Timothy Burns	Met with BB team re case status, strategy and related assignments (.3); review K. Jonch-Clausen email memo re parameters of direct action rights under California law and brief review re cited case law (.2);	0.50	\$560.00
3/11/2024	Jesse Bair	Brief review re K. Jonch-Clausen's preliminary research results re direct action rights under California law (.1);	0.10	\$90.00
3/11/2024	Jesse Bair	Additional analysis re the Debtor's underinsured exposure in advance of upcoming mediation (.2);	0.20	\$180.00
3/11/2024	Timothy Burns	Prepare for call with state court counsel re mediation issues (.2); participate in call with state court counsel re mediation issues and strategy (.4); participate in conference with J. Bair re mediation and Plan term-sheet strategy (.4);	1.00	\$1,120.00
3/11/2024	Timothy Burns	Review K. Jonch-Clausen factual analysis re claims alleging abuse in uninsured or underinsured periods (.2);	0.20	\$224.00
3/11/2024	Karin Jonch-Clausen	Participate in conference with BB team re case status and related insurance projects (.3);	0.30	\$165.00
3/12/2024	Jesse Bair	Prepare for state court counsel meeting re mediation strategy and plan term sheet issues (.1);	0.10	\$90.00
3/12/2024	Jesse Bair	Additional review of the insurers' motions to dismiss the debtor's third amended complaint (.3);	0.30	\$270.00
3/12/2024	Jesse Bair	Draft the Committee's joinder in support of the Debtor's oppositions to the insurers' motions to dismiss the third amended complaint (1.5);	1.50	\$1,350.00
3/12/2024	Timothy Burns	Prepare for state court counsel meeting re mediation and insurance issues (.4);	0.40	\$448.00
3/12/2024	Jesse Bair	Correspondence with the debtor re the debtor's and committee's response to the insurers' motions to dismiss (.1);	0.10	\$90.00
3/13/2024	Timothy Burns	Met with J. Bair re insurance Plan strategy (.2);	0.20	\$224.00
3/13/2024	Jesse Bair	Review the debtor's draft response to the excess insurers' motion to dismiss (.3);	0.30	\$270.00
3/13/2024	Jesse Bair	Review and respond to correspondence with C. Restel re call to discuss motion to compel issues (.1);	0.10	\$90.00
3/13/2024	Jesse Bair	Additional analysis re insurance Plan issues in advance of upcoming mediation session (.2);	0.20	\$180.00
3/13/2024	Jesse Bair	Participate in conference with T. Burns re insurance Plan strategy (.2);	0.20	\$180.00

3/13/2024	Brian Cawley	Continue reviewing insurer Rule 2004 productions in connection with ongoing Rule 2004 issues (.3);	0.30	\$165.00
3/13/2024	Jesse Bair	Review the debtor's draft response to Westchester's motion to dismiss (.2);	0.20	\$180.00
3/13/2024	Jesse Bair	Edit and finalize the Committee's joinder in support of the debtor's objections to the insurers' motions to dismiss (.2); correspondence with G. Albert re same (.1);	0.30	\$270.00
3/13/2024	Jesse Bair	Correspondence with Lowenstein and G. Albert re motion to withdraw the reference hearing (.1);	0.10	\$90.00
3/14/2024	Brian Cawley	Research and analyze California case law re excess insurer bad faith and the parameters of same (2.6);	2.60	\$1,430.00
3/14/2024	Jesse Bair	Review correspondence with the debtor, CNA, and the court re hearing and briefing issues on the insurers' motions to dismiss (.1);	0.10	\$90.00
3/14/2024	Jesse Bair	Review and edit pro hac vice applications for insurance district court actions and correspond with G. Albert and C. M Mitsuoka re same (.2);	0.20	\$180.00
3/15/2024	Jesse Bair	Review correspondence from Travelers re its Rule 2004 production and responses (.1);	0.10	\$90.00
3/15/2024	Jesse Bair	Correspond with Westport re the scope of the Committee's Rule 2004 requests (.1);	0.10	\$90.00
3/15/2024	Timothy Burns	Continue preparing for upcoming mediation session by reviewing case insurance overview (.2);	0.20	\$224.00
3/15/2024	Timothy Burns	Met with J. Bair re potential motion to compel and the insurers' motions to withdraw the reference (.2);	0.20	\$224.00
3/15/2024	Timothy Burns	Review correspondence with the debtor, carriers, and J. Bair re motion to withdraw reference hearing (.1);	0.10	\$112.00
3/15/2024	Jesse Bair	Review US Fire's production and written responses to the Committee's Rule 2004 subpoena (.1);	0.10	\$90.00
3/15/2024	Jesse Bair	Prepare for conference with Lowenstein team re the insurers' document production status and motion to compel issues (.1); participate in conference with Lowenstein team re same (.4);	0.50	\$450.00
3/15/2024	Jesse Bair	Correspond with BB team re finalizing and filing Burns Bair pro hac vice submissions (.1);	0.10	\$90.00

3/15/2024	Brian Cawley	Research and analyze California case law re insurer bad faith in the context of multi-insurer towers and parameters of same (2.1);	2.10	\$1,155.00
3/15/2024	Jesse Bair	Review LMI's statement of non-objection to the insurers' motions to withdraw the reference (.1); correspondence with the carriers and debtor re hearing issues in connection with same (.1);	0.20	\$180.00
3/15/2024	Jesse Bair	Participate in conference with T. Burns re Rule 2004 motion to compel issues and motion to withdraw the reference hearing (.2);	0.20	\$180.00
3/17/2024	Jesse Bair	Brief review of Chubb's Rule 2004 line item privilege log and correspond with BB team re analysis needed of same and Chubb's supplemental document production (.2);	0.20	\$180.00
3/18/2024	Timothy Burns	Participate in pre-mediation meeting with Committee professionals re mediation strategy (1.0);	1.00	\$1,120.00
3/18/2024	Brian Cawley	Begin reviewing newly produced Chubb documents (.8);	0.80	\$440.00
3/18/2024	Jesse Bair	Brief review of the Committee's Rule 2004 motion to compel and correspond with N. Kuenzi re factual analysis needed in connection with same (.1);	0.10	\$90.00
3/18/2024	Nathan Kuenzi	Analyze Westport production materials for underwriting materials and draft summary email for J. Bair (.8);	0.80	\$440.00
3/18/2024	Nathan Kuenzi	Revise and edit portion of the Committee's motion to compel regarding factual assertions concerning the insurers' document productions to date (.6);	0.60	\$330.00
3/18/2024	Nathan Kuenzi	Draft summary of findings from recent production of Chubb supplemental materials (.2);	0.20	\$110.00
3/18/2024	Timothy Burns	Continue preparing for mediation by reviewing case insurance materials and draft term sheets and formulating strategy for day 1 of mediation (.9);	0.90	\$1,008.00
3/18/2024	Timothy Burns	Participate in full-day mediation session (7.7);	7.70	\$8,624.00
3/18/2024	Jesse Bair	Review correspondence and Order from the Court re status conference on New Jersey motion to quash action (.1);	0.10	\$90.00
3/18/2024	Jesse Bair	Review the district court's order withdrawing the reference (.1); draft insurance case update email to the Committee (.2);	0.30	\$270.00

3/18/2024	Karen Dempksi	Revise and edit pro hac vice applications for J. Bair and T. Burns in the insurance district court actions (.4); email J. Bair re same (.1); finalize and file with court (.2);	0.70	\$238.00
3/18/2024	Nathan Kuenzi	Review and analyze portion of newly produced Chubb documents (.8);	0.80	\$440.00
3/18/2024	Timothy Burns	Participate in post-mediation meeting with Committee professionals in preparation for Day 2 of mediation (.6);	0.60	\$672.00
3/18/2024	Timothy Burns	Prepare for Day 2 of mediation (.7);	0.70	\$784.00
3/18/2024	Jesse Bair	Correspondence with BB team re review needed of Chubb's supplemental document production (.1);	0.10	\$90.00
3/19/2024	Jesse Bair	Review and edit the Committee's motion to compel compliance with insurance Rule 2004 subpoena (.7);	0.70	\$630.00
3/19/2024	Timothy Burns	Listen to SCOTUS oral argument re insurance neutrality issues (.1);	0.10	\$112.00
3/19/2024	Timothy Burns	Participate in full-day mediation session (9.0);	9.00	\$10,080.00
3/20/2024	Timothy Burns	Updated J. Bair re mediation developments and discussed next steps (.2);	0.20	\$224.00
3/20/2024	Jesse Bair	Participate in call with T. Burns re outcome of first mediation session (.2);	0.20	\$180.00
3/20/2024	Brian Cawley	Continue detailed research and analysis re excess insurer bad faith and insurer bad faith in the context of multi-insurer towers and parameters of same (2.9);	2.90	\$1,595.00
3/21/2024	Jesse Bair	Participate in conference with T. Burns re outcome of call with Lowenstein re case insurance and mediation strategy (.2);	0.20	\$180.00
3/21/2024	Jesse Bair	Review US Fire correspondence re the Committee's motion to compel and correspond with C. Restel re same and Westport issues (.2);	0.20	\$180.00
3/21/2024	Timothy Burns	Review US Fire's request to withdraw motion to compel (.1);	0.10	\$112.00
3/21/2024	Timothy Burns	Reviewed order regarding motions to dismiss in adversary proceeding (.1);	0.10	\$112.00
3/21/2024	Timothy Burns	Participate in call with J. Prol re mediation strategy (.4); met with J. Bair re same (.1);	0.50	\$560.00
3/21/2024	Timothy Burns	Review and respond to J. Bair correspondence re motion to compel re Westport Ins. Co. (.2);	0.20	\$224.00
3/21/2024	Brian Cawley	Analyze debtor policy documents concerning specifics of duty to cooperate, right to associate, duty to defend, and consent to settle provisions (2.3);	2.30	\$1,265.00

3/21/2024	Timothy Burns	Review correspondence with Debtor and Committee re next mediation session (.1);	0.10	\$112.00
3/21/2024	Brian Cawley	Research and analyze California case law re excess insurer right to participate in and/or control defense (2.6);	2.60	\$1,430.00
3/22/2024	Jesse Bair	Review various correspondence with US Fire, CNA, Westport, and Lowenstein re various motion to compel issues (.3);	0.30	\$270.00
3/22/2024	Nathan Kuenzi	Review CNA production re claims file materials (.5);	0.50	\$275.00
3/22/2024	Jesse Bair	Participate in call with Lowenstein re responding to Westport's motion to compel opposition and related motion to compel issues with other insurers (.4);	0.40	\$360.00
3/22/2024	Timothy Burns	Conference with J. Bair re motion to compel issues and overall insurance strategy (.2);	0.20	\$224.00
3/22/2024	Nathan Kuenzi	Review CNA correspondence regarding discovery issues (.2); analyze CNA production of materials to date (.4); respond to J. Bair with details of production (.2);	0.80	\$440.00
3/22/2024	Jesse Bair	Analysis re US Fire coverage position and correspond with the Debtor re same (.2); participate in conference with T. Burns re motion to compel issues and overall insurance strategy (.2);	0.40	\$360.00
3/22/2024	Brian Cawley	Research excess insurer duty to defend issues in context of multi-insurer claim (1.7);	1.70	\$935.00
3/23/2024	Jesse Bair	Review correspondence with CNA re document production status (.1);	0.10	\$90.00
3/23/2024	Jesse Bair	Review the excess insurers' reply in support of motion to dismiss the debtor's third amended complaint (.3);	0.30	\$270.00
3/24/2024	Timothy Burns	Brief review of Certain Excess Insurers Reply in Support of Motion to Dismiss (.2); email to internal team re status hearing preparation (.1);	0.30	\$336.00
3/24/2024	Timothy Burns	Review multiple correspondence between Westport and Committee counsel re discovery hearing and meet and confer (.2);	0.20	\$224.00
3/24/2024	Nathan Kuenzi	Review materials relevant to pending MTD hearing and pending motion to compel/quash hearing (.4);	0.40	\$220.00
3/24/2024	Timothy Burns	Review internal BB correspondence re Continental's document production (.1);	0.10	\$112.00
3/24/2024	Timothy Burns	Review correspondence with US Fire and Lowenstein re discovery compliance (.2);	0.20	\$224.00
3/24/2024	Timothy Burns	Brief review of Westport's Responses and Objections to the Committee's document requests and privilege log (.5);	0.50	\$560.00

3/24/2024	Timothy Burns	Brief review of American Home motion to withdraw the reference brief and declaration (.2);	0.20	\$224.00
3/24/2024	Timothy Burns	Review various correspondence with the mediator, Debtor, and Lowenstein re subsequent mediation sessions (.2);	0.20	\$224.00
3/24/2024	Timothy Burns	Review Chubb's Reply in Support of Its Motion to Dismiss (.2);	0.20	\$224.00
3/24/2024	Timothy Burns	Review additional correspondence with the insurers re 2004 production and motions to compel (.2);	0.20	\$224.00
3/25/2024	Jesse Bair	Participate in call with Lowenstein and state court counsel re case status and mediation strategy (.2);	0.20	\$180.00
3/25/2024	Nathan Kuenzi	Participate in BB team meeting re case status and ongoing insurance projects (.1);	0.10	\$55.00
3/25/2024	Timothy Burns	Met with internal team re case strategy, developments, and assignments (.1);	0.10	\$112.00
3/25/2024	Jesse Bair	Participate in BB team meeting re case status and ongoing insurance projects (.1);	0.10	\$90.00
3/25/2024	Karin Jonch-Clausen	Conduct supplemental research re direct action rights under California law (.6); draft summary for T. Burns re same (.2);	0.80	\$440.00
3/26/2024	Brian Cawley	Begin drafting memorandum re parameters of bad faith failure to settle issues with respect to multi-insurer and multi-year claims (2.2);	2.20	\$1,210.00
3/26/2024	Jesse Bair	Review LMI's designation of Rule 2004 record on appeal and assess potential supplementation of same by Committee (.3);	0.30	\$270.00
3/26/2024	Nathan Kuenzi	Analyze Chubb's Rule 2004 privilege log (1.3);	1.30	\$715.00
3/26/2024	Jesse Bair	Review and edit the Committee's opposition to AHAC's motion to quash Rule 2004 subpoena (.7);	0.70	\$630.00
3/26/2024	Nathan Kuenzi	Analyze and identify key cases for preparation for upcoming hearing on various Rule 2004 -related motions (2.4);	2.40	\$1,320.00
3/26/2024	Alyssa Turgeon	Prepare mediation preparation binder for next mediation session (.5);	0.50	\$170.00
3/26/2024	Jesse Bair	Review and respond to various correspondence with the debtor, Westport, and Lowenstein re motion compel hearing issues (.2);	0.20	\$180.00
3/26/2024	Timothy Burns	Review multiple emails with the insurers, Lowenstein and J. Bair re hearing on motions to compel (.2); email to internal team re preparations for hearing (.1);	0.30	\$336.00

3/26/2024	Timothy Burns	Review proposed LMI record on appeal and correspondence with Lowenstein and J. Bair re same (.2);	0.20	\$224.00
3/26/2024	Jesse Bair	Correspond with Lowenstein and T. Burns re district court insurance status conference and status conference statement in connection with same (.1);	0.10	\$90.00
3/26/2024	Jesse Bair	Review AHAC's motion to quash Rule 2004 subpoena (.2);	0.20	\$180.00
3/26/2024	Jesse Bair	Supplemental analysis re California case law re discoverability of reserve information and correspond with debtor re same (.3);	0.30	\$270.00
3/26/2024	Timothy Burns	Review correspondence with Travelers and Lowenstein re document production, motion to compel, and meet and confer (.2);	0.20	\$224.00
3/26/2024	Timothy Burns	Begin preparations for next mediation session (.3);	0.30	\$336.00
3/26/2024	Jesse Bair	Correspond with N. Kuenzi re further analysis of Chubb and Westport privilege logs (.1);	0.10	\$90.00
3/27/2024	Timothy Burns	Review and respond to correspondence from B. Weisenberg to the Committee re mediation sessions (.1);	0.10	\$112.00
3/27/2024	Timothy Burns	Review correspondence from Travelers re Travelers' discovery obligations (.1);	0.10	\$112.00
3/27/2024	Jesse Bair	Participate in conference with T. Burns re case status, strategy, and ongoing insurance projects (.2);	0.20	\$180.00
3/27/2024	Timothy Burns	Participate in call with state court counsel re insurance and mediation strategy (.2);	0.20	\$224.00
3/27/2024	Timothy Burns	Participate in conference with J. Bair re case status, strategy, and ongoing insurance projects (.2);	0.20	\$224.00
3/27/2024	Timothy Burns	Review correspondence with the insurers, RCBO, and Committee counsel re Westport's motion for protective order (.2); further analysis in connection with same (.1); review additional emails re Westport's motion (.2);	0.50	\$560.00
3/27/2024	Timothy Burns	Continue preparations for next mediation session (.7);	0.70	\$784.00
3/27/2024	Brian Cawley	Continue drafting memorandum on insurer bad faith in multi-insurer situations (1.8);	1.80	\$990.00
3/27/2024	Timothy Burns	Review and revise draft stipulation to continue hearing on various motions (.1);	0.10	\$112.00
3/28/2024	Nathan Kuenzi	Analyze recently produced CNA documents (1.7);	1.70	\$935.00
3/28/2024	Timothy Burns	Review the Committee's letter to Westport re Westport's privilege log deficiencies (.2);	0.20	\$224.00

3/28/2024	Jesse Bair	Review the Committee's privilege log deficiency letter to Westport (.1);	0.10	\$90.00
3/28/2024	Timothy Burns	Review correspondence from Westport to G. Albert re April 10 status conference and draft stipulation regarding same (.1);	0.10	\$112.00
3/28/2024	Timothy Burns	Review correspondence with Travelers and Lowenstein re Travelers' document production (.2);	0.20	\$224.00
3/28/2024	Nathan Kuenzi	Analyze Westport privilege log, Chubb privilege log, and CNA privilege log, emphasizing Westport redactions of material on relevance grounds and compare against materials produced/redacted (2.3);	2.30	\$1,265.00
3/28/2024	Timothy Burns	Review multiple emails re April 26 Rule 2004 hearing and various insurers' participation in connection with same (.2);	0.20	\$224.00
3/28/2024	Brian Cawley	Finish drafting memorandum re various bad faith issues in connection with multi-insurer and multi-year claim situations (1.9);	1.90	\$1,045.00
3/29/2024	Jesse Bair	Review various correspondence with CNA, Travelers, Westport, and Lowenstein re Rule 2004 compliance, extensions, and upcoming hearing re same (.2);	0.20	\$180.00
3/29/2024	Timothy Burns	Review multiple emails between the insurers and Committee counsel re stipulation re hearing on subpoena discovery (.2);	0.20	\$224.00
3/29/2024	Timothy Burns	Review report of CNA document production (.2);	0.20	\$224.00
3/29/2024	Nathan Kuenzi	Draft email to J. Bair with assessment of supplemental CNA production (.1);	0.10	\$55.00
3/29/2024	Nathan Kuenzi	Analyze Westport privilege log and compare against materials produced/redacted (1.4);	1.40	\$770.00
3/29/2024	Timothy Burns	Participate in call with state court counsel re mediation strategy (.2);	0.20	\$224.00
3/29/2024	Alyssa Turgeon	Prepare Rule 2004 hearing preparation binder (2.9);	2.90	\$986.00
Totals for Insurance Recovery Activities			144.40	\$111,584.00

Total Hours and Fees	150.90	\$117,816.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/14/2024	Wisconsin Certificate of Good Standing, J. Bair (pro hac vice application)	\$3.05
03/14/2024	Wisconsin Certificate of Good Standing, T. Burns (pro hac vice application)	\$3.05

03/17/2024	Hotel, T. Burns (3 nights)	\$897.00
03/17/2024	United Airlines, T. Burns (MSN-SFO, March 17-20, 2024)	\$764.35
03/17/2024	Travel meal, T. Burns	\$10.86
03/18/2024	Pro Hac Vice Application Fee, T. Burns (24-cv-00711)	\$328.00
03/18/2024	Pro Hac Vice Application Fee, J. Bair (24-cv-00709)	\$328.00
03/18/2024	Pro Hac Vice Application Fee, J. Bair (24-cv-00711)	\$328.00
03/18/2024	Pro Hac Vice Application Fee, T. Burns (24-cv-00709)	\$328.00
03/20/2024	Travel meal, T. Burns	\$35.69
03/20/2024	Uber, T. Burns (hotel to airport)	\$135.42
Total Expenses		\$3,161.42

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	Paralegal	7.50	\$340.00	\$2,550.00
Brenda Horn-Edwards	Paralegal	0.30	\$340.00	\$102.00
Brian Cawley	Associate	26.40	\$550.00	\$14,520.00
Jesse Bair	Partner	24.30	\$900.00	\$21,870.00
Karen Dempksi	Paralegal	0.70	\$340.00	\$238.00
Karin Jonch-Clausen	Associate	16.10	\$550.00	\$8,855.00
Nathan Kuenzi	Associate	26.30	\$550.00	\$14,465.00
Timothy Burns	Partner	49.30	\$1,120.00	\$55,216.00

Total Due This Invoice: \$120,977.42