

FOLEY & LARDNER LLP

Jeffrey R. Blease (CA Bar. No. 134933)

Tel: (617) 226-3155; jblease@foley.com

Thomas F. Carlucci (CA Bar No. 135767)

Tel: (415) 984-9824; tcarlucci@foley.com

Shane J. Moses (CA Bar No. 250533)

Tel: (415) 438-6404; smoses@foley.com

Emil P. Khatchatourian (CA Bar No. 265290)

Tel: (312) 832-5156; ekhatchatourian@foley.comAnn Marie Uetz (admitted *pro hac vice*)Tel: (313) 234-7114; auetz@foley.comMatthew D. Lee (admitted *pro hac vice*)Tel: (608) 258-4203; mdlee@foley.com

555 California Street, Suite 1700

San Francisco, CA 94104-1520

*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

**TENTH MONTHLY FEE STATEMENT 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
MARCH 1, 2024 THROUGH MARCH 31, 2024;**

Judge: Hon. William J. Lafferty

**Objection Deadline: May 10, 2024
4:00 p.m. (Pacific Time)**

[No Hearing Requested]

Name of Applicant:	Foley & Lardner LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Effective as of May 8, 2023 by Order entered June 15, 2023 [Dkt. No. 145]
Period for Which Compensation and Reimbursement is Sought:	March 1, 2024 – March 31, 2024
Amount of Compensation Sought as Actual, Reasonable and Necessary: ¹	\$410,027.50
20% Holdback:	\$82,005.50
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: ²	\$5,415.65
Total of Compensation (Net of Holdback) and Expense Reimbursement Sought:	\$333,437.65

PRELIMINARY STATEMENT

On May 8, 2023 (the “Petition Date”), The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the “Debtor” or “RCBO”)³ commenced the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case” or the “Bankruptcy Case”). The Debtor continues to operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this Chapter 11 Case.

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* [Dkt. No. 60] (the “Retention Application”). The

¹ Foley & Lardner LLP has agreed not to 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 Monthly Fee Statement.

² Foley & Lardner LLP has agreed not to bill the Debtor for the expenses for its attorneys to travel to or from the Bay Area, in connection with this Chapter 11 Case, and such amounts are not included in this Monthly Fee Statement.

³ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Order.

1 Court approved the Retention Application on June 15, 2023, entering the *Order Approving Debtor's*
2 *Application to Employ Foley & Lardner LLP as General Bankruptcy Counsel Pursuant to 11 U.S.C. §§*
3 *327(a), 330, 331 & 1107, and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure* [Dkt.
4 No. 145] (the "Foley Retention Order").

5 Also on May 23, 2023, the Office of the United States Trustee filed its notice of appointment of
6 an Official Committee of Unsecured Creditors [Dkt. No. 58].

7 On May 26, 2023, the Debtor filed the *Debtor's Motion for an Order Establishing Procedures for*
8 *Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 70] (the
9 "Compensation Procedures Motion"). The Court granted the Compensation Procedures Motion on June
10 23, 2023, entering the *Order Authorizing Procedures for Interim Compensation and Reimbursement of*
11 *Expenses of Professionals* [Dkt. No. 170] (the "Compensation Procedures Order").

12 Foley & Lardner LLP ("Foley" or "Applicant"), as general bankruptcy counsel to the Debtor,
13 hereby submits its tenth monthly fee statement (the "Monthly Fee Statement") for allowance of payment
14 of compensation for professional services rendered and for reimbursement of actual and necessary
15 expenses incurred for the period commencing March 1, 2024 through and including March 31, 2024 (the
16 "Fee Period") pursuant to the Compensation Procedures Order.

17 By this Monthly Fee Statement, Foley seeks (i) a monthly interim allowance of compensation in
18 the amount of \$410,027.50 and actual and necessary expenses in the amount of \$5,415.65 for a total
19 allowance of \$415,443.15 and (ii) payment of \$328,022.00 (80% of the allowed fees pursuant to the
20 Compensation Procedures Order) and reimbursement of \$5,415.65 (100% of the allowed expenses
21 pursuant to the Compensation Procedures Order) for a total payment of \$333,437.65 for the Fee Period.

22 **SERVICES RENDERED AND EXPENSES INCURRED DURING THE FEE PERIOD**

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

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

28 TENTH MONTHLY FEE STATEMENT OF FOLEY & LARDNER LLP

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

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

NOTICE AND OBJECTION PROCEDURES

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

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

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

DATED: April 30, 2024

FOLEY & LARDNER LLP

Jeffrey R. Blease
Thomas F. Carlucci
Shane J. Moses
Emil P. Khatchatourian
Ann Marie Uetz
Matthew D. Lee

/s/ Shane J. Moses

SHANE J. MOSES

*Counsel for the Debtor
and Debtor in Possession*

EXHIBIT 1

**Compensation by Professional
March 1, 2024 – March 31, 2024**

Name of Professional Individual	Initials	Position of the Professional, Year of Obtaining License to Practice	Hourly Billing Rate	Total Hours Billed	Total Compensation
Dania Abbasi	DAAB	Associate, 2019	\$630	42.80	\$26,964.00
Emmaline S. Jurgena	ESJ	Associate, 2019	\$630	6.50	\$4,095.00
Jose A. Lazaro	JAL	Associate, 2020	\$600	2.30	\$1,380.00
Joseph S. Harper	JSH	Associate, 2016	\$700	14.60	\$10,220.00
Kirsten R. Dedrickson	KRD	Associate, 2018	\$685	5.80	\$3,973.00
Mason Roberts	MR	Associate, 2018	\$690	3.50	\$2,415.00
Mary Rofaeil	MRL	Associate, 2021	\$570	34.40	\$19,608.00
Mikaela R. Mitcham	MRM	Associate, 2021	\$570	1.00	\$570.00
Stephanie McPhail	SMP	Associate, 2019	\$630	1.40	\$882.00
Shane J. Moses	SJM	Of Counsel, 2005	\$750	32.40	\$24,300.00
Angela A. Henes	AAAM	Research, N/A	\$240	0.30	\$72.00
Janelle C. Harrison	JCH	Paralegal, N/A	\$300	32.80	\$9,840.00
Kerry A. Farrar	KAFA	Paralegal, N/A	\$395	18.10	\$7,149.50
Adam J. Hepworth	AJHE	Partner, 2013	\$775	0.20	\$155.00
Ann Marie Uetz	AMUE	Partner, 1993	\$925	97.60	\$90,280.00
Eileen R. Ridley	ERR	Partner, 1990	\$975	20.50	\$19,987.50
Emil P. Khatchatourian	EPK	Partner, 2009	\$800	42.60	\$34,080.00
Jason J. Kohout	JJK	Partner, 2007	\$875	2.90	\$2,537.50
Jeffrey R. Blease	JRBL	Partner, 1988	\$1,275	17.50	\$22,312.50
Jonathan P. Witt	JPWI	Partner, 2009	\$800	1.70	\$1,360.00
Mark C. Moore	MCM	Partner, 2010	\$825	51.30	\$42,322.50
Matthew D. Lee	MDL	Partner, 2006	\$800	46.50	\$37,200.00
Thomas F. Carlucci	TFCA	Partner, 1987	\$1,325	1.40	\$1,855.00
Matthew S. Kiel	MSK	Senior Counsel, 2014	\$775	2.60	\$2,015.00
Robert T. Stewart	RTST	Senior Counsel, 2014	\$740	7.00	\$5,180.00
Daniyal M. Habib	DMH	Special Counsel, 2017	\$475	54.30	\$25,792.50
Tamar N. Dolcourt	TND	Special Counsel, 2009	\$735	17.10	\$12,568.50
Kevin T. Lewman	KTLE	Technical Specialist, N/A	\$415	2.20	\$913.00
TOTAL				561.30	\$410,027.50

EXHIBIT 2

**Compensation by Category
March 1, 2024 – March 31, 2024**

Category	Hours Billed this Fee Period	Total for Fee Statement
003 – Automatic Stay	0.50	\$400.00
004 – Bankruptcy Litigation/ Adversary Proceedings	15.70	\$11,770.00
005 – Bar Date Motion/ Claims Reconciliation Issues	19.00	\$13,199.00
006 – Case Administration (Docket Updates, WIP and calendar)	28.10	\$12,745.00
007 – Chapter 11 Plan/ Plan Confirmation	18.30	\$13,685.00
008 – Communications with Client	20.60	\$18,531.50
009 – Corporate Governance and Board Issues	10.70	\$7,278.00
011 – Cash Management	5.80	\$4,777.50
013 – Employee Issues	1.20	\$788.00
014 – Exclusivity	1.80	\$1,360.00
015 – Executory Contracts/ Lease Issues	5.80	\$3,490.00
016 – General Case Strategy (includes calls with client and team calls)	12.80	\$10,600.50
017 – Hearings and Court Matters	5.50	\$5,087.50
018 – Non-Bankruptcy Litigation	1.80	\$1,440.00
020 – Retention/Billing/Fee Applications for Debtor Professionals	31.50	\$20,846.00
021 – Retention/ Fee Applications: Ordinary Course Professionals	4.20	\$3,093.50
022 – Retention/ Fee Applications: Other Professionals	3.70	\$2,383.50
025- U.S. Trustee Issues/ Meetings/ Communications/ Monthly Operating Reports	2.00	\$1,600.00
026 – Unsecured Creditors Issues/Communications/Meetings	1.20	\$1,062.50
027 – Real Estate and Real Property Issues	1.90	\$2,280.00
031 – Insurance Issues (coverage, includes adversary proceeding)	152.90	\$100,163.50
032 – Rule 2004 Motions/Discovery/Subpoenas	28.60	\$17,420.50
038 – Mediation	187.70	\$156,026.00
TOTAL	561.30	\$410,027.50

EXHIBIT 3

**Expense by Category
March 1, 2024 – March 31, 2024**

Costs/Expense	Amount Billed
Electronic Legal Research Services	\$1,722.30
LSS – eDiscovery Services	\$3,600.00
Other Fees	\$3.05
Recording / Filing Fees	\$90.30
TOTAL	\$5,415.65

EXHIBIT 4

**Time Detail Entries
March 1, 2024 – March 31, 2024**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



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

Paul B. Bongiovanni
Chief Financial Officer
Roman Catholic Bishop of Oakland
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: April 30, 2024
Invoice No.: 50828972
Our Ref. No.: 100845-0402

Remittance Advice

Re: Chapter 11 Bankruptcy

Current Invoice:

04/30/24 - 50828972	\$415,443.15
Total Amount Due:	\$415,443.15

Please mail check payments to:

Foley & Lardner LLP
P.O. Box 78470
Milwaukee, WI 53278-8470

Foley & Lardner LLP's preferred payment method is ACH
(CTX or CCD+ transmission) with invoice number(s)
included in the addenda of the ACH.

Please send electronic payment remittance advice and
questions to accountsreceivable@foley.com.

Foley & Lardner LLP
U.S. Bank, NA
777 E. Wisconsin Ave.
Milwaukee, WI 53202
ABA No.: 075000022
Acct No.: 112031389
Swift Code: USBKUS44IMT
(foreign wires only)

Paul B. Bongiovanni
Chief Financial Officer
Roman Catholic Bishop of Oakland
Diocese of Oakland
2121 Harrison St., Ste. 100
Oakland, CA 94612

Date: April 30, 2024
Invoice No.: 50828972
Our Ref. No.: 100845-0402

Services through March 31, 2024

Amount due for professional services rendered regarding Chapter 11 Bankruptcy	\$410,027.50
--	--------------

Total Expenses:	\$5,415.65
-----------------	------------

Amount Due:	\$415,443.15
--------------------	---------------------

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 2

Foley & Lardner LLP

April 30, 2024

Professional Services Detail**003 Automatic Stay**

03/06/24	EPK	Email correspondence with A. Uetz regarding update on resolution of stay violations.	0.20	\$160.00
03/10/24	EPK	Review prior responses from plaintiffs' attorneys in response to stay violation letters sent last month (.2); assess whether any further follow up with counsel is necessary (.1).	0.30	\$240.00
Task Total:			0.50	\$400.00

004 Bankruptcy Litigation/Adversary Proceedings

03/05/24	EPK	Review email correspondence from B. Wilson of the Plageman firm and P. Bongiovanni regarding Bennett Trust issues (.2); email correspondence with M. Lee regarding strategy relating to probate administration of the Bennett Trust (.1).	0.30	\$240.00
03/06/24	EPK	Coordinate with P. Bongiovanni and the Plageman firm regarding next steps relating to probate administration of the Bennett Trust.	0.20	\$160.00
03/07/24	EPK	Review current draft of demand letter to Bennett Trust trustee regarding turnover of trust distributions (.1); revise same (.1); call with M. Lee to discuss settlement strategy relating to same (.2); call with R. Lund and B. Wilson of the Plageman firm and P. Bongiovanni regarding Bennett Trust strategy and probate issues to be addressed (.9); post-call email correspondence with B. Wilson regarding demand letter citations (.2).	1.50	\$1,200.00
03/08/24	EPK	Address probate issues relating to beneficial interests of St. Perpetua under the Bennett Trust (.3); call with J. Harper regarding research and demand letter assignment relating to same (.6).	0.90	\$720.00
03/08/24	JSH	Call with E. Khatchatourian regarding Bennett Trust probate/turnover issue letter (.5); research regarding the same (.2).	0.70	\$490.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 3

Foley & Lardner LLP

April 30, 2024

03/09/24	EPK	Email correspondence with P. Bongiovanni regarding status of demand letter relating to Bennett Trust issues.	0.20	\$160.00
03/11/24	EPK	Strategy call with J. Harper regarding turnover demand letter to be sent to the trustee of the Bennett Trust (.4); review correspondence from counsel for the trustee of the Bennett Trust (.2); review probate petition that was filed in September 2023 (.1).	0.70	\$560.00
03/11/24	JSH	Analyze probate exception issues and probate docket filings (1.5); draft turnover letter regarding Bennett Trust (1.0).	2.50	\$1,750.00
03/12/24	EPK	Confer with J. Harper regarding Bennett Trust demand letter issues (.3); review revised draft of the turnover demand letter (.2); edit and comment on same (.2).	0.70	\$560.00
03/12/24	JSH	Revise turnover letter re Bennett Trust (1.7); strategize with E. Khatchaturian regarding the same (.2).	1.90	\$1,330.00
03/18/24	EPK	Revise turnover demand letter to counsel to the Bennett Trust trustee (.5); confer with J. Harper regarding additional case law support to be cited within same (.1).	0.60	\$480.00
03/19/24	EPK	Confer with J. Harper regarding turnover strategy relating to the Bennett Trust beneficial interest (.3); email correspondence with M. Lee regarding revised turnover letter (.1).	0.40	\$320.00
03/19/24	JSH	Revise turnover letter regarding Bennett Trust in communication with E. Khatchaturian.	0.60	\$420.00
03/23/24	MDL	Edit letter to trustee of Bennett Trust demanding turnover of trust proceeds reserved for church beneficiary.	0.20	\$160.00
03/24/24	EPK	Finalize demand letter to counsel for the trustee of the Bennett Trust (.2); review comments from M. Lee regarding same (.1); send draft turnover demand letter to RCBO's probate counsel, R. Lund and B. Wilson of the Plageman firm (.1).	0.40	\$320.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 4

Foley & Lardner LLP

April 30, 2024

03/27/24	EPK	Email correspondence with RCBO's probate counsel, R. Lund of Plageman, Lund & Cannon, regarding comments to Bennett Trust turnover demand letter (.2); review R. Lund's comments (.1); confer with J. Harper regarding further revisions to be made to the turnover demand letter (.2).	0.50	\$400.00
03/27/24	JSH	Edit turnover letter regarding Bennett Trust in communication with E. Khatchatourian.	1.50	\$1,050.00
03/28/24	EPK	Email correspondence with J. Harper regarding comments to Bennett Trust demand letter (.3); provide limited comments to same (.2); email correspondence with R. Lund of the Plageman firm regarding revised turnover demand letter and next steps relating to same (.1).	0.60	\$480.00
03/28/24	JSH	Revise turnover letter regarding Bennett Trust in communication with E. Khatchatourian and probate counsel.	0.70	\$490.00
03/29/24	EPK	Email correspondence with RCBO's probate counsel, R. Lund of Plageman, Lund & Cannon, regarding Bennett Trust dispute strategy (.3); Foley team correspondence regarding finalization of turnover demand letter (.1).	0.40	\$320.00
03/31/24	EPK	Email correspondence with M. Lee and J. Harper regarding finalization of the Bennett Trust turnover demand letter and expected timing of transmission of same.	0.20	\$160.00
Task Total:			15.70	\$11,770.00

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

03/04/24	AMUE	Review information from Clergy III files regarding claims.	0.90	\$832.50
03/04/24	MCM	Review email correspondence regarding inquiry on claims issue (.2); confer with K. Farrar regarding response to same and incorporation of data into slide decks (.3).	0.50	\$412.50
03/07/24	KAFA	Research historical Clergy III settlement agreements (facts and documentation).	1.70	\$671.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 5

Foley & Lardner LLP

April 30, 2024

03/07/24	MCM	Analyze issues in connection with previously settled claims following inquiry from Committee as to same.	0.70	\$577.50
03/21/24	MCM	Email correspondence with counsel for claimant that filed late claim in January 2024 regarding discussion about allowance of same (.4); review files in preparation for discussion with counsel (.4).	0.80	\$660.00
03/22/24	KAFA	Analysis of late-filed proof of claim.	0.60	\$237.00
03/22/24	MCM	Conference call with counsel for claimant that filed late claim in January 2024 (.3); analyze issues in connection with applicable standard for excusable neglect (.4); email correspondence with Foley team regarding recommendation for addressing claim (.4); email correspondence with Committee counsel regarding same (.3).	1.40	\$1,155.00
03/24/24	MRL	Email correspondence to M. Moore regarding late-filed claims research.	0.20	\$114.00
03/25/24	MCM	Conference call with counsel for Committee regarding late-filed claim issues (.4); email correspondence with counsel for claimant and Committee to confirm sharing of declarations in support of draft motion (.3); email correspondence with Foley team regarding status of discussions (.3).	1.00	\$825.00
03/26/24	KAFA	Analysis of late-filed proof of claim.	0.20	\$79.00
03/26/24	MCM	Email correspondence regarding analysis of proofs of claim where claimants did not file state-court complaints in compliance with California statute (.3); analyze issues in connection with same (.5); update to Foley team regarding discussions on late-filed claim and strategy for same after consultations with Committee (.3).	1.10	\$907.50
03/27/24	JCH	Review and apply redactions to two proofs of claim filed.	0.80	\$240.00
03/27/24	MCM	Confer with M. Rofaail regarding research into issues concerning statute of limitations and failure to file complaints by claimants pursuant to California state law (.3); review issues related to same (.5).	0.80	\$660.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 6

Foley & Lardner LLP

April 30, 2024

03/27/24	MCM	Email correspondence with Committee counsel and counsel for claimant regarding late-filed claim allowance issues (.3); email update to Foley team regarding same (.2); analyze case law regarding excusable neglect in Ninth Circuit (.5).	1.00	\$825.00
03/27/24	MRL	Confer with M. Moore regarding research on California Emergency Rule 9 (.3); research case law on California Emergency Rule 9 and its applicability to claims that did not file state law suits (2.6).	2.90	\$1,653.00
03/28/24	MCM	Analyze results of research into interplay of California Emergency Rule 9, 11 USC 108(c), and Bar Date Order relating to claims where claimants did not file state-court complaint.	0.50	\$412.50
03/29/24	MCM	Analyze issues in connection with interplay of California Emergency Rule 9, 11 USC 108(c), and Bar Date Order relating to claims where claimants did not file state-court complaint (1.7); telephone conference with M. Lee regarding same (.5).	2.20	\$1,815.00
03/29/24	MDL	Strategize with M. Moore regarding statute of limitations question for certain survivor claims.	0.30	\$240.00
03/29/24	SMP	Research regarding impact of Emergency Rule 9 on statute of limitations.	1.40	\$882.00
Task Total:			19.00	\$13,199.00

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

03/01/24	JCH	Update daily docket report.	0.50	\$150.00
03/04/24	EPK	Review proposed updated master case calendar and key dates timeline (.1); provide comments to same (.2); review updated master case calendar following additional revisions (.1).	0.40	\$320.00
03/04/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
03/04/24	JSH	Update weekly timeline and slides per case developments and activity on dockets.	0.90	\$630.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 7

Foley & Lardner LLP

April 30, 2024

03/04/24	MDL	Telephone conference with S. Moses to strategize regarding scheduling of hearings on pending and forthcoming motions (.4); email correspondence related to same (.1).	0.50	\$400.00
03/04/24	MRL	Summarize daily docket activity and upcoming deadlines for client report.	0.30	\$171.00
03/05/24	JCH	Update daily docket report.	0.50	\$150.00
03/06/24	EPK	Review information relating to counsel of record for individual Committee members.	0.20	\$160.00
03/06/24	JCH	Update daily docket report.	0.50	\$150.00
03/07/24	EPK	Evaluate next round of Bankruptcy Code deadlines that should potentially be extended (.1); review briefing schedules and reporting obligations coming due in the next two months (.1); review archived documents and communications to evaluate bankruptcy case administration compliance issues (.4).	0.60	\$480.00
03/07/24	JCH	Update daily docket report.	0.50	\$150.00
03/08/24	JCH	Update daily docket report.	0.50	\$150.00
03/08/24	MDL	Telephone conference with A. Ermac regarding hearing schedule for discovery motions and interim fee applications.	0.10	\$80.00
03/09/24	MRL	Summarize daily docket activity and upcoming deadlines for client report.	0.40	\$228.00
03/11/24	JCH	Revise Master Case Calendar and Timeline.	0.80	\$240.00
03/11/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.80	\$560.00
03/12/24	EPK	Review updated master case calendar and key dates timeline.	0.20	\$160.00
03/12/24	JCH	Update daily docket report.	0.50	\$150.00
03/12/24	MRL	Summarize docket activity to update client report.	0.30	\$171.00
03/13/24	JCH	Update daily docket report (.5); calendar updated objection deadlines and hearing dates related to recent filings (.5).	1.00	\$300.00
03/14/24	JCH	Update daily docket report.	0.50	\$150.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 8

Foley & Lardner LLP

April 30, 2024

03/15/24	JCH	Update daily docket report.	0.50	\$150.00
03/15/24	MRL	Summarize daily docket activity and upcoming deadlines for client report.	0.60	\$342.00
03/18/24	EPK	Comment on this week's master case calendar updates (.2); review finalized master case calendar and key dates timeline (.1).	0.30	\$240.00
03/18/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5); calendar response deadline on Westport's Motion for Protective Order and status conference regarding NJ action (.5).	1.50	\$450.00
03/18/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.70	\$490.00
03/18/24	MRL	Summarize docket activity to circulate update for client report (1.0); review email from J. Harrison regarding docket update (.1).	1.10	\$627.00
03/19/24	EPK	Email correspondence with S. Levitt of A&M regarding Rule 2015.3 reporting dates (.2); coordinate with J. Harrison on updates to master calendar relating to same (.1).	0.30	\$240.00
03/19/24	JCH	Update daily docket report (.5); prepare index for today's hearing on interim fee application, compile electronic copies of pleadings and prepare zip file of same (.8).	1.30	\$390.00
03/20/24	EPK	Advise J. Harrison regarding Rule 2015.3 reporting requirements and relevant deadlines (.2); confer with A. Uetz regarding CNO to be filed in connection with unopposed motion to extend lease assumption deadline (.2); work with D. Nichols to prepare draft of CNO (.1).	0.50	\$400.00
03/20/24	JCH	Update daily docket report (.5); calculate and calendar additional deadlines related to Rule 2015.3 reports (.5); email to A. Uetz including summary of matters being heard at April 17 and April 18 hearings in bankruptcy court and district court (.5).	1.50	\$450.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 9

Foley & Lardner LLP

April 30, 2024

03/21/24	JCH	Update daily docket report (.5); prepare Notice of Summary of Wages Expenses for February 2024 (.5); file monthly operating report for February 2024 and Notice of Wages Expenses (.5); calendar response deadlines to LMI and Committee motions filed (.5).	2.00	\$600.00
03/22/24	JCH	Update daily docket report (.2); revise Master Case Calendar (.5).	0.70	\$210.00
03/23/24	MRL	Summarize daily docket activity and upcoming deadlines for client report.	0.30	\$171.00
03/25/24	EPK	Review updated master case calendar and key dates timeline (.2); provide comments on same to J. Harrison and J. Harper (.2).	0.40	\$320.00
03/25/24	JCH	Revise Master Case Calendar and Timeline (.5); update daily docket report (.5).	1.00	\$300.00
03/25/24	JSH	Update weekly timeline and slides per case developments and activity on numerous dockets.	0.60	\$420.00
03/26/24	JCH	Circulate updated Master Case Calendar & Timeline to Foley group (.2); update daily docket report (.5).	0.70	\$210.00
03/26/24	MRL	Summarize docket activity for client report (.6); review email from J. Harrison with RCBO docket update (.1).	0.70	\$399.00
03/27/24	JCH	Update daily docket report.	0.50	\$150.00
03/27/24	SJM	Email correspondence with A. Uetz, M. Lee, and E. Ridley regarding scheduling of upcoming hearings.	0.30	\$225.00
03/28/24	EPK	Review new case dates and deadlines, including review of schedule for ongoing mediation sessions and task list relating to same.	0.30	\$240.00
03/28/24	JCH	Update daily docket report.	0.50	\$150.00
03/29/24	JCH	Update daily docket report.	0.50	\$150.00
03/31/24	MRL	Summarize daily docket activity and upcoming deadlines for client.	0.30	\$171.00
Task Total:			28.10	\$12,745.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 10

Foley & Lardner LLP

April 30, 2024

007 Chapter 11 Plan/ Plan Confirmation

03/04/24	MCM	Attention to issues regarding insurance neutrality in Camden and other similar cases.	0.50	\$412.50
03/04/24	MRM	Analyze amended plan and disclosure statement in Camden bankruptcy for insurance neutrality language.	1.00	\$570.00
03/05/24	MCM	Attention to issues regarding insurance neutrality in Camden case and revisions to plan language based on objections (.5); email correspondence with Foley team regarding same (.3).	0.80	\$660.00
03/08/24	MCM	Analyze issues in connection with ownership of relics and interplay of free-exercise clause and bankruptcy law in context of same.	0.40	\$330.00
03/11/24	MCM	Analyze issues in connection with ownership of relics and interplay of free-exercise clause and bankruptcy law in context of same.	0.40	\$330.00
03/13/24	ESJ	Correspond with J. Kohout regarding restricted gifts and endowment funds, treatment under California law, California statutes applicable to religious corporations, and creditor protection.	0.50	\$315.00
03/13/24	ESJ	Prepare PowerPoint slides regarding restricted gifts and endowment funds, treatment under California law, and creditor protection.	1.50	\$945.00
03/13/24	ESJ	Research restricted gifts and endowment funds, treatment under California law, and creditor protection.	4.50	\$2,835.00
03/14/24	MCM	Attention to plan issues concerning confirmation of plan in Camden case (.4); email correspondence with Foley team regarding same (.2).	0.60	\$495.00
03/18/24	AMUE	Outline strategy for plan of reorganization.	1.10	\$1,017.50
03/19/24	MCM	Attention to Plan structure and asset-analysis issues in connection with preparation of Plan outline and term sheet.	4.00	\$3,300.00
03/23/24	MCM	Review email correspondence from M. Lee regarding analysis of insurance neutrality issues in connection with plan formulation.	0.40	\$330.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 11
Foley & Lardner LLP
April 30, 2024

03/24/24	MCM	Analyze issues regarding insurance neutrality in connection with plan formulation.	0.60	\$495.00
03/25/24	MCM	Analyze issues regarding insurance neutrality in connection with plan formulation.	1.00	\$825.00
03/29/24	MCM	Analyze recent developments in other diocesan bankruptcy cases in connection with formulation of a plan of reorganization.	1.00	\$825.00
Task Total:			18.30	\$13,685.00

008 Communications with Client

03/01/24	AMUE	Meeting with P. Bongiovanni regarding SteerCo (.7); meeting with M. Kemner and P. Bongiovanni to discuss how to streamline various tasks for greater efficiency (1.0).	1.70	\$1,572.50
03/04/24	AMUE	Communication with client leadership to prepare for mediation.	0.80	\$740.00
03/05/24	AMUE	Meeting with P. Bongiovanni and C. Moore regarding SteerCo meeting strategy.	0.50	\$462.50
03/05/24	MDL	Telephone conference with P. Bongiovanni regarding Livermore property, documents related to same, and status of efforts to collect estate assets from Bennett Trust.	0.20	\$160.00
03/06/24	AMUE	Multiple (5+) emails with M. Kemner regarding Bishop's meeting with priests (.7); draft outline of talking points for meeting (.6); review email regarding asset discussion with mediator (.2) and respond to same (.2).	1.70	\$1,572.50
03/06/24	JRBL	Telephone conference from P. Bongiovanni regarding mediation.	0.50	\$637.50
03/06/24	MDL	Participate in weekly diligence call with P. Bongiovanni, D. Flanagan (VeraCruz), and A&M personnel.	0.50	\$400.00
03/06/24	MDL	Telephone conference with M. Kemner, P. Bongiovanni, and C. Moore (A&M) regarding property of the estate issues.	1.20	\$960.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 12

Foley & Lardner LLP

April 30, 2024

03/07/24	AMUE	Meeting with P. Bongiovanni, M. Kemner, E. Ridley and A. Armanino regarding insurance strategy and mediation.	1.00	\$925.00
03/07/24	AMUE	Finalize strategy memo update for client.	0.50	\$462.50
03/07/24	ERR	Prepare for (.4) and attend meeting with client representatives regarding status of insurance coverage analysis with M. Kemner, P. Bongiovanni, A. Uetz and A. Armanino (1.0).	1.40	\$1,365.00
03/10/24	AMUE	Review communication received from P. Bongiovanni regarding restricted funds.	0.30	\$277.50
03/10/24	AMUE	Communication with C. de Quesada and client leadership team regarding chapter 11 administration as it relates to various finance tasks designed to make the estate more efficient.	0.30	\$277.50
03/15/24	MCM	Draft email update to client parties concerning confirmation of Camden plan and terms thereof.	0.40	\$330.00
03/20/24	AMUE	Meeting with client team (M. Kemner and P. Bongiovanni), VeraCruz and C. Moore to discuss moving various finance workstreams to achieve greater efficiency for the Debtor.	0.80	\$740.00
03/20/24	AMUE	Communication with P. Bongiovanni regarding real estate issue.	0.40	\$370.00
03/20/24	JRBL	Telephone conference with P. Bongiovanni regarding updates.	0.40	\$510.00
03/20/24	SJM	Attend meeting with client team, VeraCruz, C. Moore and Foley team regarding finance transition plan.	0.70	\$525.00
03/21/24	MDL	Telephone conference with P. Bongiovanni regarding real estate identification and valuation points.	0.60	\$480.00
03/22/24	AMUE	Email communication with M. Kemner regarding mediation (.2); telephone meeting with M. Kemner regarding mediation (.5).	0.70	\$647.50
03/22/24	SJM	Attend finance transition meeting with A. Bardos, P. Bongiovanni, A&M, and VeraCruz.	0.90	\$675.00
03/23/24	MDL	Email correspondence with P. Bongiovanni regarding real estate valuation and cost-proration issue.	0.20	\$160.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 13

Foley & Lardner LLP

April 30, 2024

03/25/24	JRBL	Telephone conference with P. Bongiovanni regarding insurance coverage for sinkhole matter.	0.80	\$1,020.00
03/26/24	MRL	Draft email regarding the status of the case for the client.	0.60	\$342.00
03/27/24	AMUE	Meeting with P. Bongiovanni regarding chapter 11 strategy as it relates to mediation.	0.80	\$740.00
03/27/24	JRBL	Telephone conference with P. Bongiovanni regarding transition issues.	0.50	\$637.50
03/27/24	MRL	Draft email regarding the status of the case for the client (.3); review edits from M. Roberts regarding the email (.3).	0.60	\$342.00
03/27/24	SJM	Participate in meeting with P. Bongiovanni, A. Bardos, VeraCruz, and A&M regarding professional fee payment process (.6); participate in meeting with P. Bongiovanni, A. Bardos, VeraCruz, and A&M regarding plan and Committee diligence process (1.0).	1.60	\$1,200.00
Task Total:			20.60	\$18,531.50

009 Corporate Governance and Board Issues

03/04/24	EPK	Email correspondence with D. Balaguer of Fish & Richardson to confirm submission of the FCC application relating to CTN registrations (.1); brief review of as-filed ownership change and FCC application forms (.1).	0.20	\$160.00
03/12/24	EPK	Confer with J. Witt and M. Kiel regarding corporate governance issues relating to Adventus (.3); review corporate formation documents for Adventus (.3).	0.60	\$480.00
03/12/24	JAL	Communications with M. Kiel on requested research related to Adventus (.1); review articles of incorporation and other governance materials (.4).	0.50	\$300.00
03/12/24	JPWI	Draft correspondence related to RCBO's interest in third-party entity.	0.50	\$400.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 14

Foley & Lardner LLP

April 30, 2024

03/12/24	MSK	Analysis of Articles of Incorporation of Adventus (.2); work in furtherance of preparing recommendation regarding ownership and control structure of Adventus (.3); correspondence with E. Khatchatourian and J. Witt regarding ownership structure of Adventus (.2).	0.70	\$542.50
03/14/24	EPK	Follow up with M. Kiel regarding analysis of Adventus's corporate and governance structure (.1); review Adventus corporate structure and governance analysis prepared by the Foley corporate team (.2).	0.30	\$240.00
03/14/24	JAL	Analyze Adventus articles of incorporation and bylaws and other available governance documents (1.4); prepare summary findings for M. Kiel's review (.4).	1.80	\$1,080.00
03/14/24	JPWI	Draft correspondence related to RCBO's interest in Adventus entity.	0.70	\$560.00
03/14/24	MSK	Analysis of Articles of Incorporation, Bylaws and related corporate documentation of Adventus (.4); analysis of California nonprofit public benefit corporation statutes in connection with ownership and control analysis of Adventus (.6); draft summary and recommendation regarding Adventus control and ownership (.6); correspondence with E. Khatchatourian and J. Witt regarding ownership structure of Adventus (.3).	1.90	\$1,472.50
03/18/24	JPWI	Review assets summary slide deck (.3) and draft correspondence related to same (.2).	0.50	\$400.00
03/18/24	JRBL	Respond to auditor requests for information.	0.20	\$255.00
03/18/24	KTLE	Review request from auditor for update to audit response letter for FYE 12.31.22 (.1); emails to and from timekeepers regarding updates to prior audit response letter (.2); prepare draft audit response letter update (.3); update audit files (.1).	0.70	\$290.50
03/19/24	KTLE	Emails to and from timekeepers regarding disclosures for audit response letter update.	0.20	\$83.00
03/20/24	KTLE	Emails to and from timekeepers regarding disclosures for update to audit response letter.	0.20	\$83.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 15
Foley & Lardner LLP
April 30, 2024

03/21/24	EPK	Review corporate governance analysis for certain Non-Debtor Catholic Entities.	0.20	\$160.00
03/23/24	MDL	Draft update to Moss Adams regarding claims asserted in bankruptcy against RCBO.	0.20	\$160.00
03/25/24	KTLE	Emails to and from timekeepers regarding disclosures for update to audit response letter (.1); continue preparation of audit response letter update (.2); update audit files (.1).	0.40	\$166.00
03/28/24	AJHE	Approve audit letter response.	0.20	\$155.00
03/28/24	KTLE	Emails to and from timekeepers regarding disclosures for update to audit response letter(.2); finalize audit response letter update and send to client and auditor (.4); update audit files (.1).	0.70	\$290.50
Task Total:			10.70	\$7,278.00

011 Cash Management

03/04/24	EPK	Coordinate with the A&M team regarding status of incremental restricted cash documentation collection and substantiation process (.2); review email from P. Bongiovanni regarding updated restricted cash substantiation communication to the parishes (.1); comment on form of proposed communication (.2); conference call with RCBO, Foley, and A&M teams regarding updates to the restricted cash substantiation process and other cash management issues (.5).	1.00	\$800.00
03/06/24	EPK	Communications with R. Medeiros and P. Bongiovanni regarding handling of certain donations from foundations.	0.40	\$320.00
03/10/24	EPK	Review update from P. Bongiovanni regarding next round of restricted assets documentation to be collected from parishes.	0.10	\$80.00
03/12/24	EPK	Email correspondence with J. Kohout regarding ongoing analysis of restricted cash holdings and legal support for same (.3); review spreadsheet summarizing prior analysis of parish cash (.4); coordination call with J. Kohout to review legal arguments relating to restricted cash and donations (.6).	1.30	\$1,040.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 16
Foley & Lardner LLP
April 30, 2024

03/12/24	JJK	Conference with E. Khatchatourian regarding restricted gift law and research.	0.60	\$525.00
03/13/24	JJK	Review legal analysis for gifting.	0.90	\$787.50
03/14/24	JJK	Review gift agreements for restricted gift analysis.	0.60	\$525.00
03/25/24	EPK	Conference call with the RCBO, Foley, and A&M teams to review parish cash substantiation criteria and status of collection and analysis of additional documents from churches.	0.40	\$320.00
03/29/24	MDL	Telephone conference with S. Moses regarding notice to Committee and U.S. Trustee of CCCEB quarterly rent payment.	0.10	\$80.00
03/29/24	SJM	Prepare notice to Committee and U.S. Trustee regarding quarterly CCCEB Payment.	0.40	\$300.00
Task Total:			5.80	\$4,777.50

013 Employee Issues

03/19/24	JSH	Research and analyze LTC payment provisions issues for M. Lee.	0.80	\$560.00
03/19/24	MRL	Review Relativity for Priest Long Term Care fund documents (.2); email correspondence with the Foley team regarding the same (.2).	0.40	\$228.00
Task Total:			1.20	\$788.00

014 Exclusivity

03/20/24	EPK	Assess requirements for further extension of plan exclusivity period.	0.20	\$160.00
03/24/24	SJM	Begin drafting third motion to extend exclusivity.	1.60	\$1,200.00
Task Total:			1.80	\$1,360.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 17

Foley & Lardner LLP

April 30, 2024

015 Executory Contracts/ Lease Issues

03/04/24	MDL	Revise motion to extend lease assumption deadline and supporting papers.	0.70	\$560.00
03/06/24	JCH	File Second Stipulation related to extension of lease assumption/rejection deadline (.2); file related Third Motion to Extend Deadline to Assume or Reject CCCEB lease, Bongiovanni Declaration and Notice of Hearing (.5).	0.70	\$210.00
03/06/24	SJM	Finalize motion to extend time to assume CCCEB lease and supporting papers.	0.40	\$300.00
03/20/24	JCH	Prepare certificate of no objection regarding Debtor's Third Motion to Extend Deadline to Assume or Reject Lease.	0.50	\$150.00
03/21/24	EPK	Revise the CNO for the unopposed motion to extend lease-assumption deadline (.2); coordinate with J. Harrison and S. Moses regarding timing for filing of same and related communication with the bankruptcy court (.3); revise proposed order extending lease-assumption deadline (.2).	0.70	\$560.00
03/21/24	SJM	Respond to E. Khatchatourian regarding status of motion to extend time to assume CCCEB lease.	0.20	\$150.00
03/22/24	EPK	Follow up with S. Moses and J. Harrison regarding filing of CNO for lease assumption deadline motion and related communications with the bankruptcy court.	0.30	\$240.00
03/25/24	EPK	Follow up on filing of CNO for unopposed motion to extend deadline and uploading of related proposed order.	0.30	\$240.00
03/25/24	JCH	File certificate of no objection and upload proposed order regarding Debtors' Third Motion to Extend Assumption/Rejection deadline.	0.50	\$150.00
03/26/24	EPK	Follow up on entry of order extending lease assumption deadline (.1); review reminders relating to and docketing of extended deadline (.1).	0.20	\$160.00
03/26/24	JCH	Calendar updated deadlines related to Lease Assumption/Rejection.	0.50	\$150.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 18

Foley & Lardner LLP

April 30, 2024

03/26/24	SJM	Review entered order extending time to assume CCCEB lease (.2); confirm dates for further motion to extend time if needed (.2).	0.40	\$300.00
03/27/24	EPK	Follow up on entry of lease assumption deadline extension order and cancellation of hearing (.2); Foley restructuring team email correspondence regarding same (.2).	0.40	\$320.00
Task Total:			5.80	\$3,490.00

016 General Case Strategy (includes team calls)

03/01/24	MCM	Review email correspondence regarding recent case developments in other diocesan bankruptcy cases.	0.30	\$247.50
03/01/24	TFCA	Review updated article on Rockville plan.	0.30	\$397.50
03/04/24	AMUE	Review upcoming case deadlines (0.2) and outline strategy regarding same, including insurance adversary proceeding and exclusivity (0.9).	1.10	\$1,017.50
03/04/24	SJM	Telephone call with M. Lee regarding CCCEB lease motion and planning for upcoming filings and hearings (.4); draft email summary of upcoming matters and planning issues for case team (.9); email to J. Harrison regarding upcoming deadlines (.3); email correspondence with A. Uetz regarding status of fee examiner motion and implications for pending fee applications (.2).	1.80	\$1,350.00
03/04/24	TFCA	Analyze TV presentation regarding SF/Oakland clergy abuse for team.	0.50	\$662.50
03/05/24	MRL	Summarize docket activity to circulate update to team.	0.40	\$228.00
03/05/24	TFCA	Review update from A. Uetz (.2); telephone call with J. Blease regarding same (.2).	0.40	\$530.00
03/06/24	MDL	Draft list of discussion points for Bishop Barber in meeting with priests.	0.30	\$240.00
03/06/24	SJM	Respond to A. Uetz regarding counsel for Committee members.	0.30	\$225.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 19

Foley & Lardner LLP

April 30, 2024

03/07/24	MDL	Evaluate Canon Law considerations with respect to relics, artifacts, and art.	0.20	\$160.00
03/11/24	SJM	Prepare email to A. Uetz regarding upcoming hearings and filings.	1.10	\$825.00
03/12/24	AMUE	Review finance deliverables related to cash management order for the purpose of reassigning same to achieve greater efficiency in case.	0.90	\$832.50
03/12/24	AMUE	Meeting with C. Moore regarding transition of work to VeraCruz and finance team to achieve greater efficiency.	0.50	\$462.50
03/13/24	SJM	Email correspondence with A. Uetz, E. Ridley, and M. Lee regarding scheduling and appearances for upcoming hearings (.3); review current district court procedures regarding remote and in-person appearance for hearings (.4).	0.70	\$525.00
03/14/24	MRL	Review weekly update.	0.20	\$114.00
03/17/24	MRL	Summarize daily docket activity and upcoming deadlines for team.	0.80	\$456.00
03/19/24	MDL	Strategize with A. Uetz for hearing on fee applications and on issue of Committee protective order.	0.20	\$160.00
03/19/24	SJM	Prepare email to A. Uetz detailing status of Santa Rosa case and mediation efforts (.7); prepare email to A. Uetz detailing status of San Francisco case and mediation efforts (.5); further email regarding San Francisco case discovery disputes (.2); respond to email from A. Uetz regarding discussion of RCC loan (.2); respond to email from A. Uetz regarding confirmation of total fee requests in case to date (.2).	1.80	\$1,350.00
03/21/24	MCM	Analyze legal and factual issues raised by Committee at mediation regarding obligated group (.4); draft email correspondence with Foley team summarizing responses to same (.3).	0.70	\$577.50
03/21/24	MDL	Evaluate property of the estate issue with respect to Non-Debtor Catholic Entities targeted by Committee.	0.30	\$240.00
Task Total:			12.80	\$10,600.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 20

Foley & Lardner LLP

April 30, 2024

017 Hearings and Court Matters

03/19/24	AMUE	Prepare for hearing on status conference regarding insurance adversary proceedings and U.S. Trustee's objections to fee applications.	2.70	\$2,497.50
03/19/24	AMUE	Attend single court hearing regarding multiple matters, including status conference on insurance issues, Committee's motion for further protective order and U.S. Trustee's objection to fee applications (1.0) and prepare for same (1.8).	2.80	\$2,590.00
Task Total:			5.50	\$5,087.50

018 Non-Bankruptcy Litigation

03/22/24	EPK	Brief review of JCCP case management statement.	0.10	\$80.00
03/27/24	EPK	Review JCCP 5108 notices provided by A. Ouellette (.2); listen to CMC in JCCP 5108 to ascertain bankruptcy-related issues that affect RCBO (1.4).	1.60	\$1,280.00
03/28/24	EPK	Review email correspondence with institutional defendants' liaison counsel, D. Zamora, regarding JCCP CMC schedule.	0.10	\$80.00
Task Total:			1.80	\$1,440.00

020 Retention/Billing/Fee Applications for Debtor Professionals

03/06/24	MDL	Email exchange with Foley team regarding timing of monthly payments of professional fees.	0.30	\$240.00
03/07/24	SJM	Summarize U.S. Trustee objections to Foley and A&M applications for A. Uetz and M. Lee (.6); respond to email from A. Uetz regarding implications of fee examiner motion for objections and timing of hearing/replies (.3); telephone call with B. Weisenberg regarding schedule for hearing on fee applications (.2); email to A. Uetz summarizing call with Committee counsel (.2).	1.30	\$975.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 21

Foley & Lardner LLP

April 30, 2024

03/11/24	MDL	Revise stipulation and order to extend deadline for replying to U.S. Trustee's objections to Foley second interim fee application.	0.10	\$80.00
03/11/24	SJM	Draft stipulation to continue deadline to respond to U.S. Trustee objections to fee applications (.8); email correspondence with J. Blumberg regarding stipulation (.3).	1.10	\$825.00
03/12/24	JCH	Prepare and file certificates of no objection for Foley and A&M January monthly fee statements.	0.80	\$240.00
03/12/24	SJM	Review draft CNOs for Foley and A&M monthly fee statements (.3); email correspondence with C. Moore regarding A&M monthly statement (.2).	0.50	\$375.00
03/13/24	JCH	Prepare chart of interim amounts owed to professionals and email same to M. Lee.	0.50	\$150.00
03/13/24	MDL	Email exchange with Lowenstein (B. Weisenberg, J. Prol) regarding payment of January fee statements, missing CNOs by Committee professionals, and resolution of U.S. Trustee's objections to Foley's fee application.	0.20	\$160.00
03/14/24	JCH	Prepare draft Notice of Agreement with U.S. Trustee regarding reductions of fees in interim fee applications.	1.50	\$450.00
03/14/24	TND	Begin preparation of information for Foley's February fee statement to ensure compliance with U.S. Trustee Guidelines.	0.50	\$367.50
03/15/24	JCH	Revisions to Notice of Partial Resolutions to U.S. Trustee objections to interim fee applications (.8); finalize Notice (.5).	1.30	\$390.00
03/15/24	SJM	Prepare notice of agreed reductions to fee applications (2.2); email correspondence with Committee counsel and other professionals regarding same (.6); revise notice based on additional resolutions (.7); prepare supplemental notice (.6).	4.10	\$3,075.00
03/15/24	TND	Review information needed for February fee statement to ensure U.S. Trustee guideline compliance.	0.20	\$147.00
03/16/24	SJM	Prepare notice of errata regarding A&M reply to objection to fee application.	0.40	\$300.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 22

Foley & Lardner LLP

April 30, 2024

03/16/24	TND	Revise information for Foley February monthly fee statement to ensure compliance with U.S. Trustee Guidelines.	0.40	\$294.00
03/18/24	TND	Further preparation of Foley February fee application to ensure compliance with U.S. Trustee guidelines.	2.20	\$1,617.00
03/19/24	SJM	Prepare draft combined order granting fee applications (1.4); email correspondence with Committee counsel regarding form of order (.3).	1.70	\$1,275.00
03/19/24	TND	Further preparation of February Foley fee statement to ensure compliance with U.S. Trustee guidelines.	3.80	\$2,793.00
03/20/24	SJM	Revise proposed fee order based on Committee comments (.8); email correspondence with J. Bair regarding allocation of Burns Bair agreed reduction (.2); email to J. Blumberg regarding approval of draft order (.1); finalize form of order (.2).	1.30	\$975.00
03/20/24	TND	Further preparation of information needed for Foley's February monthly statement to ensure compliance with U.S. Trustee guidelines.	2.10	\$1,543.50
03/21/24	TND	Further preparation of Foley February fee statement to ensure U.S. Trustee guideline compliance.	0.70	\$514.50
03/22/24	JSH	Work on monthly fee statement to ensure compliance with UST guidelines.	0.30	\$210.00
03/22/24	TND	Follow up with J. Harper to ensure coverage for finalization of February fee statement (.2); respond to inquiry from A. Uetz on fee increases of other case professionals (.1).	0.30	\$220.50
03/27/24	AMUE	Revise monthly fee statement to ensure compliance with UST fee guidelines.	1.20	\$1,110.00
03/27/24	TND	Review A&M February fee statement for compliance with U.S. Trustee guidelines.	0.20	\$147.00
03/28/24	JCH	Prepare information for Foley monthly fee statement to ensure compliance with UST Guidelines (.8); prepare draft of Foley's monthly fee statement for February 2024 (.8).	1.60	\$480.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 23

Foley & Lardner LLP

April 30, 2024

03/28/24	JSH	Work on monthly fee statement cover sheet updates and notice.	1.00	\$700.00
03/28/24	SJM	Email correspondence with A. Uetz and J. Blease regarding order on fee applications.	0.40	\$300.00
03/28/24	TND	Email correspondence with J. Harrison regarding filing of A&M February monthly fee statement.	0.20	\$147.00
03/29/24	JCH	File Foley and A&M's monthly fee statements for February 2024.	0.50	\$150.00
03/29/24	JSH	Coordinate filing of monthly fee statement.	0.10	\$70.00
03/29/24	SJM	Review A&M monthly fee statement (.3); revise draft Foley monthly fee statement provisions regarding notice of fee increase (.4).	0.70	\$525.00
Task Total:			31.50	\$20,846.00

021 Retention/Fee Applications: Ordinary Course Professionals

03/07/24	TND	Analyze need for increased OCP cap (.2); review Kemner invoice (.2).	0.40	\$294.00
03/08/24	TND	Discuss OCP cap matters and related issues with A. Uetz.	0.20	\$147.00
03/11/24	TND	Respond to emails from S. Levitt and A. Uetz regarding OCP cap matters.	0.20	\$147.00
03/12/24	TND	Correspondence with A. Uetz regarding potential need for increased OCP cap and motion for same.	0.20	\$147.00
03/18/24	TND	Review issues related to increase in OCP cap (.3); email correspondence with A. Uetz regarding motion on same (.2); email to IAS regarding OCP retention and fees (.1).	0.60	\$441.00
03/20/24	TND	Begin preparation of motion to increase OCP cap.	0.40	\$294.00
03/21/24	TND	Further drafting of motion to increase OCP caps and proposed order regarding same.	2.10	\$1,543.50
03/23/24	MDL	Correspondence with Lowenstein (B. Weisenberg, C. Restel) regarding VeraCruz February 2024 invoice.	0.10	\$80.00
Task Total:			4.20	\$3,093.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 24

Foley & Lardner LLP

April 30, 2024

022 Retention/Fee Applications: Other Professionals

03/01/24	TND	Correspondence with Judge Sontchi's office regarding payment of mediation expenses (.2); correspondence with J. Krivis's office regarding payment of mediation expenses (.2); correspondence with A&M regarding same (.2).	0.60	\$441.00
03/05/24	TND	Communications with A&M regarding Krivis W-9 and payment information (.1); email to C. Hoxie regarding Krivis wire transfer information (.1).	0.20	\$147.00
03/06/24	TND	Email correspondence with C. Hoxie regarding payment method for Krivis fees (.3); email correspondence with C. Szymanski regarding payment of Sontchi fees (.2); email correspondence with S. Loop regarding mediator payments (.2); call with S. Loop regarding same (.1); review docket for mediator fee statement and CNO filings (.1).	0.90	\$661.50
03/07/24	TND	Email with J. Krivis office regarding payment of invoices.	0.10	\$73.50
03/11/24	TND	Email with C. Szymanski regarding interim fee application process and fee guidelines (.1); respond to email from G. Albert regarding Committee member expenses (.1); email to P. Bongiovanni regarding Committee member expenses (.1).	0.30	\$220.50
03/26/24	JCH	Prepare chart listing allowed amounts, payments and amounts outstanding regarding interim fee applications of professionals.	0.80	\$240.00
03/26/24	SJM	Draft email to P. Bongiovanni regarding approval of interim fee applications and payments to be made.	0.80	\$600.00
Task Total:			3.70	\$2,383.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 25

Foley & Lardner LLP

April 30, 2024

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

03/06/24	MDL	Email correspondence with K. McAbee (U.S. Trustee's Office) regarding insurance certificates she requested.	0.10	\$80.00
03/19/24	EPK	Preliminary review of the February 2024 MOR package prepared by the A&M team.	0.20	\$160.00
03/20/24	EPK	Review February 2024 MOR package prepared by the A&M team (.4); email correspondence with P. Bongiovanni and the A&M team regarding comments to same (.1); coordinate with J. Harrison regarding preparation of February 2024 MOR documents and wages order reporting documents for filing tomorrow (.1).	0.60	\$480.00
03/21/24	EPK	Short call with P. Bongiovanni and the A&M team to review and finalize the February MOR for filing today (.2); review proposed final version of February 2024 MOR package for filing and service today (.2); coordinate with J. Harrison to prepare February 2024 MOR package and wages order reporting documents for filing and service (.2).	0.60	\$480.00
03/22/24	EPK	Email correspondence to counsel for the U.S. Trustee and the Committee regarding wages order reporting documents for February 2024.	0.10	\$80.00
03/25/24	EPK	Email correspondence with S. Levitt of A&M regarding description of certain payments in monthly operating reports (.1); confer with A. Uetz and M. Lee regarding same (.1).	0.20	\$160.00
03/26/24	EPK	Confer with M. Lee regarding reporting of certain payments (.1); coordinate with S. Levitt of A&M with respect to reporting of same in next MOR (.1).	0.20	\$160.00
Task Total:			2.00	\$1,600.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 26

Foley & Lardner LLP

April 30, 2024

026 Unsecured Creditor Issues/Communications/Meetings

03/04/24	MCM	Email correspondence with counsel for Committee regarding claims inquiry.	0.30	\$247.50
03/05/24	AMUE	Two telephone meetings with B. Weisenberg regarding mediation issues.	0.80	\$740.00
03/21/24	SJM	Respond to Committee counsel regarding status of March 27 scheduled hearings.	0.10	\$75.00
Task Total:			1.20	\$1,062.50

027 Real Estate and Real Property Issues

03/24/24	EPK	Evaluate issues relating to sale of former convent owned by Non-Debtor Catholic Entity.	0.30	\$240.00
03/25/24	JRBL	Analysis of potential insurance coverage for expenses related to sinkhole per client request.	1.60	\$2,040.00
Task Total:			1.90	\$2,280.00

031 Insurance Issues (coverage, includes adversary proceeding)

03/03/24	ERR	Edit opposition briefs to primary insurers' motion to dismiss, excess insurers' motion to dismiss and CIGA motion to dismiss.	3.20	\$3,120.00
03/04/24	AMUE	Provide revisions to response to motion to dismiss filed by CIGA (which for efficiency will carry over to the other responses).	1.80	\$1,665.00
03/04/24	DMH	Strategize approach for obtaining confidentiality agreement from AJG regarding proofs of claim and preparing supplemental tender packets for proofs to insurers.	0.40	\$190.00
03/04/24	JCH	Calendar hearing and response deadlines related to LMI's motions related to appeal (.5); email correspondence with S. Moses regarding pro hac vice applications for A. Uetz and M. Lee in the District Court cases (.5); prepare draft pro hac application for A. Uetz in District Court case (.5).	1.50	\$450.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 27

Foley & Lardner LLP

April 30, 2024

03/04/24	KRD	Revise opposition to CIGA's motion to dismiss (.1); revise opposition to primary insurers' motion to dismiss (.2); revise opposition to excess insurers' motion to dismiss (.1); correspondence with A. Uetz and E. Ridley regarding oppositions to pending motions to dismiss (.1).	0.50	\$342.50
03/04/24	MDL	Revise brief in opposition to CIGA's motion to dismiss.	0.60	\$480.00
03/04/24	MDL	Revise brief in opposition to primary carrier defendants' motions to dismiss.	0.80	\$640.00
03/04/24	MDL	Revise brief in opposition to excess carriers' motions to dismiss.	0.60	\$480.00
03/04/24	SJM	Email correspondence with case team regarding need to file new pro hac vice applications in District Court (.3); research District local rules regarding pro hac vice applications (.6); revise draft pro hac vice application including to address prior approval in bankruptcy court (.4); email to A. Uetz regarding pro hac vice application (.1).	1.40	\$1,050.00
03/05/24	DMH	Analyze tender responses from Chubb to update claims analysis document based on Chubb's coverage position per claim.	3.90	\$1,852.50
03/05/24	ERR	Edit opposition to motion to dismiss regarding CIGA.	0.80	\$780.00
03/05/24	ERR	Review issues regarding recent motions by insurers regarding discovery of insurer reserves.	0.60	\$585.00
03/05/24	JCH	Finalize opposition brief to CIGA's motion to dismiss.	0.80	\$240.00
03/05/24	KRD	Revise opposition to CIGA's motion to dismiss (1.8); communications with M. Lee regarding oppositions to the pending motions to dismiss (.2); analysis regarding strategy for the opposition to excess insurers' motion to dismiss (.5).	2.50	\$1,712.50
03/05/24	MCM	Email correspondence with Foley team regarding tendering of claims in context of Bar Date Order and confidentiality procedures.	0.40	\$330.00
03/05/24	MDL	Provide instruction to J. Harrison regarding filing of brief in opposition to motion to dismiss.	0.10	\$80.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 28

Foley & Lardner LLP

April 30, 2024

03/05/24	MDL	Draft insert to motion to dismiss opposition for argument in response to excess carriers' motion to dismiss argument on allegations justifying dropping down into coverage.	0.30	\$240.00
03/05/24	MDL	Correspondence with J. Bair and T. Burns (Burns Bair) regarding brief in opposition to CIGA motion to dismiss.	0.10	\$80.00
03/05/24	MDL	Telephone conference with E. Ridley and A. Uetz regarding response to excess carriers' motion to dismiss argument on allegations justifying dropping down into coverage.	0.70	\$560.00
03/05/24	MDL	Evaluate argument in response to excess carriers' motion to dismiss argument on allegations justifying dropping down into coverage.	0.50	\$400.00
03/05/24	MRL	Email correspondence regarding the opposition to the defendants' motion to dismiss case.	0.20	\$114.00
03/05/24	SJM	Respond to questions regarding CIGA motion to dismiss third amended complaint in connection with finalizing opposition to same (.2); respond to emails from J. Harrison regarding exhibits to opposition to motion to dismiss (.2).	0.40	\$300.00
03/06/24	AMUE	Outline matters concerning motion to withdraw the reference for client communication regarding insurance coverage strategy.	0.80	\$740.00
03/06/24	AMUE	Review email received from M. Plevin regarding motions to dismiss (.1); caucus with M. Lee regarding same (.3); respond to M. Plevin (.2).	0.60	\$555.00
03/06/24	DMH	Prepare supplemental tender packets to insurers to tender proofs of claim filed against RCBO.	3.80	\$1,805.00
03/06/24	DMH	Update policy analysis document based on recent responses to claim tenders by Chubb.	2.00	\$950.00
03/06/24	EPK	Assess status of the order withdrawing the reference and briefing schedule relating to the motions to dismiss.	0.20	\$160.00
03/06/24	ERR	Respond to M. Kemner regarding discussion with claimant's insurer representative.	0.20	\$195.00
03/06/24	ERR	Review coverage issues and responses to motions to dismiss (in light of withdrawal of reference).	0.60	\$585.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 29

Foley & Lardner LLP

April 30, 2024

03/06/24	ERR	Review status of tenders regarding proofs of claim.	0.40	\$390.00
03/06/24	MCM	Attention to issues regarding tender of redacted claims pursuant to Bar Date Order.	0.50	\$412.50
03/06/24	MDL	Email exchange with counsel for insurers regarding motion to dismiss briefing and hearing schedule.	0.30	\$240.00
03/06/24	MDL	Telephone conference with A. Ermac regarding filing of motion to dismiss response in bankruptcy court.	0.20	\$160.00
03/06/24	MDL	Strategize with A. Uetz regarding insurers' challenge to RCBO's filing of response brief to motion to dismiss in bankruptcy court.	0.10	\$80.00
03/07/24	AMUE	Provide advice to Debtor insurance team regarding production of proofs of claim per bar date order.	0.70	\$647.50
03/07/24	AMUE	Review solvency of various insurers (.3) and provide advice to client leadership regarding same (.3).	0.60	\$555.00
03/07/24	DMH	Analyze proofs of claim (1.4) and prepare documents for tendering proofs to insurers through AJG (2.3).	3.70	\$1,757.50
03/07/24	MDL	Provide instruction to M. Roberts regarding verification of production of notices of tender to insurer defendants.	0.10	\$80.00
03/08/24	AMUE	Communications with M. Kemner regarding insurance coverage issue.	0.70	\$647.50
03/08/24	DAAB	Confer with D. Habib regarding best practices for tendering proofs of claim.	0.20	\$126.00
03/08/24	DMH	Prepare supplemental tender letters to broker to tender proofs of claim against RCBO to insurers.	1.30	\$617.50
03/08/24	DMH	Analyze letter from Lloyd's claiming that RCBO has not tendered any claims to them (.4) and strategize response (.8).	1.20	\$570.00
03/08/24	JCH	Prepare pro hac applications for M. Lee and A. Uetz in appeal cases.	0.50	\$150.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 30

Foley & Lardner LLP

April 30, 2024

03/08/24	SJM	Review final drafts of pro hac applications for A. Uetz and M. Lee for District Court matters (.2); email to A. Uetz and M. Lee regarding final approval of same (.1).	0.30	\$225.00
03/11/24	AMUE	Review question from M. Kemner regarding insurance coverage (.2) and outline response to same (.3).	0.50	\$462.50
03/11/24	DAAB	Confer with D. Habib regarding relevant redaction requirements (0.4) and begin preparing supplemental insurance tenders for proofs of claim accordingly (1.8).	2.20	\$1,386.00
03/11/24	DMH	Prepare supplemental tender packets, including redacted proofs of claim and tender letter, to tender proofs of claim to insurers.	2.80	\$1,330.00
03/12/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	3.40	\$2,142.00
03/12/24	DMH	Prepare supplemental tender packets, including redacted proof of claim and tender letter, to tender proofs of claim to insurers.	3.00	\$1,425.00
03/12/24	KAFA	Preparation of documents to produce to the insurers.	1.80	\$711.00
03/12/24	KRD	Review opposition to excess insurers' motion to dismiss (.1); correspondence with A. Uetz, M. Lee, and E. Ridley regarding edits to opposition to excess insurers' motion to dismiss (.1).	0.20	\$137.00
03/12/24	MDL	Revise response to excess insurers' motion to dismiss.	0.20	\$160.00
03/12/24	MDL	Revise response to primary insurers' motion to dismiss.	0.20	\$160.00
03/12/24	SJM	Finalize pro hac applications for District Court matters.	0.40	\$300.00
03/13/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	5.60	\$3,528.00
03/13/24	DMH	Prepare supplemental tender packets to tender bankruptcy proofs of claim to insurers.	3.00	\$1,425.00
03/13/24	DMH	Revise RCBO's opposition to primary insurers' motion to dismiss adversary complaint.	1.80	\$855.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 31

Foley & Lardner LLP

April 30, 2024

03/13/24	JCH	Finalize Debtor's oppositions to motions to dismiss in adversary proceeding.	0.80	\$240.00
03/13/24	KRD	Revise opposition brief to excess insurers' motion to dismiss (2.4); correspondence with M. Lee regarding same (.2).	2.60	\$1,781.00
03/13/24	MDL	Correspondence with J. Bair (Burns Bair) regarding drafts of briefs in opposition to excess carriers' and primary carriers' motions to dismiss.	0.10	\$80.00
03/13/24	MDL	Email exchange with Foley team (D. Habib, K. Dedrickson, E. Ridley) regarding finalizing briefs in opposition to excess carriers' and primary carriers' motions to dismiss.	0.30	\$240.00
03/13/24	RTST	Work on document production to the insurers.	0.60	\$444.00
03/14/24	AMUE	Review communications regarding motion to withdraw the reference and assignment of cases to federal district court.	0.50	\$462.50
03/14/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	3.00	\$1,890.00
03/14/24	DMH	Prepare supplemental claim packets to tender proofs of claim to insurers.	3.50	\$1,662.50
03/14/24	EPK	Assess status of insurance adversary proceedings and potential withdrawal of the reference with respect to those proceedings.	0.20	\$160.00
03/14/24	ERR	Review status of hearings on motions to dismiss by insurers in light of motion to withdraw reference.	0.50	\$487.50
03/14/24	MDL	Email exchange with M. Plevin (Crowell & Moring) regarding briefing schedule on motions to dismiss.	0.30	\$240.00
03/14/24	MDL	Telephone conference with S. Moses regarding status of motions to dismiss in light of communications from A. Ermac and pendency of motion to withdraw reference.	0.30	\$240.00
03/14/24	MDL	Evaluate email from A. Ermac regarding briefing schedule on motions to dismiss and hearing on same.	0.10	\$80.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 32

Foley & Lardner LLP

April 30, 2024

03/14/24	SJM	Review bankruptcy and district court dockets to confirm status of upcoming hearings on insurance related matters (.8); email to A. Uetz, E. Ridley, and M. Lee regarding upcoming deadlines and schedule of hearings (.6); telephone call with M. Lee regarding opposition deadlines for motions to dismiss (.2).	1.60	\$1,200.00
03/15/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.60	\$1,008.00
03/15/24	ERR	Review reservation letters from LMI.	0.50	\$487.50
03/15/24	ERR	Create coverage analysis valuation and provide to M. Kemner and P. Bongiovanni.	3.00	\$2,925.00
03/17/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.60	\$1,638.00
03/18/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	3.90	\$2,457.00
03/18/24	DMH	Analyze briefing in Archdiocese of New York case to prepare memorandum summarizing case and analyzing applicability to RCBO case.	2.00	\$950.00
03/18/24	ERR	Review case strategy regarding upcoming mediation, district court hearings and coverage analysis.	0.50	\$487.50
03/18/24	ERR	Review orders by District Court regarding withdrawal of reference and setting of status conference.	0.90	\$877.50
03/18/24	ERR	Review additional reservation now rights letters from LMI on various underlying claims.	0.60	\$585.00
03/18/24	JCH	Calendar case management conferences and related deadlines in Lloyd's and Pacific's District Court appeals cases.	0.50	\$150.00
03/18/24	SJM	Review order withdrawing the reference for insurance adversary (.2); email correspondence with case team on scheduling in light of same (.3); respond to A. Uetz regarding status of April 21 hearings (.2).	0.70	\$525.00
03/19/24	DMH	Analyze briefing in Archdiocese of New York case to prepare memorandum on applicability to RCBO's case.	1.80	\$855.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 33

Foley & Lardner LLP

April 30, 2024

03/19/24	ERR	Review orders regarding pending discovery disputes between insurers and Committee.	0.50	\$487.50
03/20/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	3.00	\$1,890.00
03/20/24	DMH	Analyze New York state court decision in case involving Archdiocese of New York on insurers' declaratory judgment action against ADNY.	1.40	\$665.00
03/20/24	DMH	Prepare memorandum analyzing decision from New York state court in case involving Archdiocese of New York, on similar motion as motions to dismiss facing RCBO.	4.20	\$1,995.00
03/20/24	ERR	Review upcoming hearings and case strategy regarding mediation.	0.50	\$487.50
03/20/24	ERR	Review reply briefs in support of insurers' motions to dismiss.	1.20	\$1,170.00
03/20/24	MCM	Analyze issues in connection with production of proofs of claim to insurers in light of Court order regarding protection of information (.4); email correspondence regarding same (.3).	0.70	\$577.50
03/21/24	AMUE	Review insurance neutral language from other confirmed plans.	0.80	\$740.00
03/21/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.20	\$756.00
03/21/24	DMH	Update matrix of insurance coverage and policy analysis document based on recent insurer responses.	2.20	\$1,045.00
03/21/24	ERR	Review district court order regarding pending motions to dismiss.	0.40	\$390.00
03/21/24	SJM	Respond to A. Uetz regarding prior briefing on insurer right to discovery of Committee matters.	0.20	\$150.00
03/22/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.20	\$1,386.00
03/22/24	DMH	Prepare supplemental claim tender letters for proofs of claim, to tender proofs to insurers.	2.20	\$1,045.00
03/22/24	MR	Communicate with J. Breall regarding motion to withdraw the reference in matter involving American Home.	0.10	\$69.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 34

Foley & Lardner LLP

April 30, 2024

03/22/24	SJM	Email to J. Breall regarding non-oppositions to motions to withdraw the reference.	0.30	\$225.00
03/23/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.60	\$1,008.00
03/24/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.20	\$1,386.00
03/25/24	AMUE	Review multiple (4+) emails with insurers and Committee regarding insurer objections to producing information (.4) and provide advice to Foley team regarding same (.4).	0.80	\$740.00
03/25/24	DMH	Prepare supplemental tender letters to broker to tender bankruptcy proofs of claim to insurers.	0.50	\$237.50
03/25/24	ERR	Review reply briefs by insurers regarding motion to dismiss.	1.10	\$1,072.50
03/25/24	MCM	Attention to issues concerning production of redacted proofs of claim to insurers.	0.50	\$412.50
03/25/24	MRL	Email correspondence from A. Uetz regarding the partial summary judgment in the AP case.	0.10	\$57.00
03/25/24	RTST	Work on preparing documents for production to the insurers.	1.00	\$740.00
03/26/24	AMUE	Review emails between insurers and Committee regarding pending motions (.4); outline response concerning relevance of reserve information (.6); analyze research completed by M. Roberts regarding same (.3).	1.30	\$1,202.50
03/26/24	DAAB	Confer with M. Lee, R. Stewart, and D. Habib regarding production of proofs of claim to claimants' counsel (.7); continue preparing supplemental tenders for proofs of claim (.5).	1.20	\$756.00
03/26/24	DMH	Attend strategy call with M. Moore, R. Stewart, and D. Abbasi on finalizing process to tender and produce proofs of claim to insurers.	0.70	\$332.50
03/26/24	ERR	Review coverage analysis regarding discoverability of reserve information from insurers.	0.80	\$780.00
03/26/24	KAFA	Prepare proofs of claim for production.	0.60	\$237.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 35

Foley & Lardner LLP

April 30, 2024

03/26/24	MCM	Attention to issues regarding execution of confidentiality agreements by insurer parties in preparation for production of redacted proofs of claim (.9); email correspondence regarding redaction of subsequent amended or untimely proofs of claim prior to production (.4); work on issues in connection with production size following reconciliation of claims (.5); confer with Foley team regarding necessary next steps prior to production (.4).	2.20	\$1,815.00
03/26/24	MDL	Email exchange with B. Curet (Sinnott Puebla) regarding production of proofs of claim.	0.10	\$80.00
03/26/24	MDL	Email exchange with M. Moore and R. Stewart regarding procedures for production of proofs of claim and assurances of confidential treatment of same.	0.20	\$160.00
03/26/24	MR	Plan for outlining and drafting motion for partial summary judgment in adversary proceeding.	0.50	\$345.00
03/26/24	MRL	Email correspondence with M. Roberts regarding drafting the motion for partial judgment for settlement.	0.20	\$114.00
03/26/24	RTST	Work on preparing documents for production to the insurers.	3.40	\$2,516.00
03/27/24	AMUE	Respond to email communication with T. Brown regarding insurer motions and declarations submitted to Court.	0.50	\$462.50
03/27/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	0.60	\$378.00
03/27/24	KAFA	Prepare proofs of claim for production.	0.20	\$79.00
03/27/24	MCM	Attention to issues regarding redaction of amended claims filed post-bar date in preparation for production of same to insurer parties.	0.60	\$495.00
03/27/24	RTST	Work on preparing documents for production to the insurers.	0.40	\$296.00
03/28/24	AMUE	Email communication with counsel for Committee regarding insurers' pending motions (.3); provide advice to M. Lee regarding Debtor's position regarding pending motions (.4).	0.70	\$647.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 36

Foley & Lardner LLP

April 30, 2024

03/28/24	ERR	Review status of tender to insurers (and compliance with protective order).	0.30	\$292.50
03/28/24	MCM	Attention to issues regarding production of redacted proofs of claim to insurer parties (.3); email correspondence regarding same (.5).	0.80	\$660.00
03/28/24	RTST	Work on preparing documents for production to the insurers.	0.30	\$222.00
03/29/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	1.40	\$882.00
03/29/24	MCM	Attention to issues regarding production of redacted proofs of claim to insurer parties.	0.40	\$330.00
03/30/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	2.40	\$1,512.00
03/31/24	DAAB	Continue preparing supplemental insurance tenders for proofs of claim.	4.50	\$2,835.00
03/31/24	ERR	Review potential grounds for summary judgment regarding applicability of Clergy III settlement.	0.50	\$487.50
Task Total:			152.90	\$100,163.50

032 Rule 2004 Motions/Discovery/Subpoenas

03/04/24	EPK	Email correspondence with C. Moore of A&M regarding documents to be produced to the Committee relating to the Bishop's Ministries Appeal.	0.10	\$80.00
03/04/24	KAFA	Preparation of documents for production to the Committee (3.3); attend cash substantiation call with P. Bongiovanni, L. Oberempt, D. Flanagan and A&M (.5).	3.80	\$1,501.00
03/04/24	MDL	Evaluate recent document requests from BRG.	0.20	\$160.00
03/04/24	MDL	Email exchange with K. Farrar and R. Stewart regarding review of documents collected for Committee's recent document requests.	0.30	\$240.00
03/04/24	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) regarding Committee diligence requests for cemeteries information.	0.30	\$240.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 37

Foley & Lardner LLP

April 30, 2024

03/05/24	EPK	Coordinate with M. Lee regarding documents to be produced to the Committee relating to the Bishop's Ministries Appeal.	0.10	\$80.00
03/05/24	KAFA	Preparation of documents for production to the Committee.	1.40	\$553.00
03/05/24	MDL	Provide instruction to M. Roberts regarding summary of discovery motions filed by insurers.	0.20	\$160.00
03/05/24	MDL	Email exchange with C. Restel (Lowenstein) regarding insurers' filing of motion to quash in New Jersey bankruptcy court.	0.10	\$80.00
03/05/24	MDL	Analyze summary of insurers' motions to quash and for protective order.	0.10	\$80.00
03/05/24	MR	Review insurers' motions to quash Committee Rule 2004 subpoenas and draft summaries of same.	1.80	\$1,242.00
03/06/24	JSH	Review documents for production.	0.40	\$280.00
03/06/24	KAFA	Attend Committee diligence call with P. Bongiovanni, D. Flanagan and A&M.	0.50	\$197.50
03/06/24	MDL	Email exchange with C. Restel (Lowenstein) regarding insurers' motions for protective order and to quash subpoena.	0.10	\$80.00
03/06/24	MDL	Telephone conference with M. Kemner regarding documents related to Livermore property and presentation to priests regarding plan process.	0.80	\$640.00
03/06/24	MDL	Analyze documents relating to Livermore property.	0.40	\$320.00
03/06/24	MDL	Review status of recent document collections and reviews to prepare for weekly diligence call.	0.10	\$80.00
03/07/24	EPK	Follow up on review, tagging, and production of documents relating to the Bishop's Ministries Appeal.	0.20	\$160.00
03/07/24	JSH	Review documents for production.	0.50	\$350.00
03/07/24	KAFA	Preparation of documents for production to the Committee.	0.80	\$316.00
03/07/24	MDL	Telephone conference with K. Farrar regarding production of recently reviewed documents to Committee.	0.20	\$160.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 38

Foley & Lardner LLP

April 30, 2024

03/07/24	MDL	Analyze production documents relating to Bishop's Ministries Appeal for confidentiality designation.	0.30	\$240.00
03/07/24	MDL	Telephone conference with Lowenstein (M. Kaplan, C. Restel) regarding insurers' discovery motions and the procedure and schedule around same.	0.50	\$400.00
03/07/24	MDL	Email exchange with J. Harper regarding instructions for review of recently collected financial documents in advance of production to Committee.	0.10	\$80.00
03/08/24	KAFA	Preparation of documents for production to the Committee.	1.30	\$513.50
03/08/24	MDL	Telephone conference with counsel for Committee (M. Kaplan and C. Restel) and for Westport Insurance (T. Jacobs, B. Curet) regarding meet and confer on reserve issue.	0.50	\$400.00
03/08/24	MDL	Strategize regarding case law support for position on reserve documentation being discoverable.	0.10	\$80.00
03/08/24	MDL	Telephone conference with M. Kaplan regarding schedule for briefing insurers' discovery motions and Westport position on reserve documentation.	0.20	\$160.00
03/11/24	MDL	Draft email to RCBO leadership summarizing recent discovery motions filed by insurers and procedural status of each.	0.60	\$480.00
03/12/24	KAFA	Preparation of documents for production to the Committee.	0.50	\$197.50
03/13/24	EPK	Email correspondence with D. Cassidy of Alston & Bird regarding CTN document production (.2); confer with A. Uetz and M. Lee regarding same (.1); review CTN-related documents produced by Alston & Bird (.2).	0.50	\$400.00
03/13/24	KAFA	Preparation of documents for production to the Committee.	0.50	\$197.50
03/14/24	KAFA	Review new client documents from Box and prepare for production to Committee.	0.30	\$118.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 39

Foley & Lardner LLP

April 30, 2024

03/14/24	MDL	Email correspondence with R. Manns regarding additional non-debtor Catholic entities from whom Committee has requested or may request discovery.	0.30	\$240.00
03/14/24	MDL	Telephone conference with R. Manns (Norton Rose Fulbright) regarding discovery sought by Committee against non-debtor Catholic entities.	0.30	\$240.00
03/20/24	AMUE	Review request for certain documents to analyze production obligations.	0.90	\$832.50
03/20/24	EPK	Address issues relating to the scope of documents to be produced as to real estate assets.	0.30	\$240.00
03/20/24	KAFA	Analysis of remaining client documents for production to the Committee (1.4); preparation of documents requested by the Committee (.6).	2.00	\$790.00
03/20/24	MDL	Email exchange with A. Uetz regarding information produced to Committee regarding Livermore property.	0.30	\$240.00
03/20/24	MDL	Email correspondence with R. Manns (Norton Rose Fulbright) regarding nature of Non-Debtor Catholic Entities from whom Committee may seek discovery.	0.20	\$160.00
03/21/24	KAFA	Prepare documents for production to the Committee.	0.50	\$197.50
03/21/24	RTST	Work on preparing documents for production to the insurers.	1.30	\$962.00
03/22/24	SJM	Email to case team regarding local procedure for evidentiary motions and witness testimony, in light of communications between Committee and insurers.	0.70	\$525.00
03/26/24	EPK	Review email correspondence with M. Kaplan of Lowenstein regarding discovery dispute with insurance carriers.	0.20	\$160.00
03/26/24	MDL	Evaluate dispute over production of reserve information and Debtor's position on same.	0.50	\$400.00
03/26/24	MDL	Email exchange with C. Restel and M. Kaplan (each of Lowenstein) regarding discoverability of reserve information.	0.40	\$320.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 40

Foley & Lardner LLP

April 30, 2024

03/26/24	MR	Perform research regarding discoverability of insurers' reserve information, in connection with multiple motions filed by insurers regarding Committee's Rule 2004 document requests.	0.90	\$621.00
03/27/24	EPK	Review correspondence with counsel to Westport regarding discovery dispute and evidentiary issues relating to same (.2); review email correspondence from P. Bongiovanni and L. Oberempt regarding third-party subpoena issued to financial institution (.2).	0.40	\$320.00
03/27/24	KAFA	Prepare documents for production to the Committee.	0.40	\$158.00
03/27/24	MR	Evaluate potential responses to insurers' motions to quash Rule 2004 document requests from Committee.	0.20	\$138.00
03/28/24	KAFA	Analysis of additional diligence items received from client and A&M.	0.50	\$197.50
03/29/24	MCM	Follow-up work on potential production to Committee of back-up analysis on claims and claim objections.	0.50	\$412.50
Task Total:			28.60	\$17,420.50

038 Mediation

03/01/24	AMUE	Meeting with Judge Sontchi and M. Moore regarding claim analysis (.8); debrief with M. Moore (.3).	1.10	\$1,017.50
03/01/24	JRBL	Review work product in preparation for mediation offer.	2.30	\$2,932.50
03/01/24	MCM	Prepare for (.7) and participate in conference call with Judge Sontchi regarding mediation preparation and related issues (.8); email correspondence with same based on information requests (.3).	1.80	\$1,485.00
03/01/24	MRL	Review pending dioceses cases to provide an update on their status to the Foley team and the client.	0.70	\$399.00
03/02/24	AMUE	Outline presentation for first mediation session.	1.40	\$1,295.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 41

Foley & Lardner LLP

April 30, 2024

03/02/24	JRBL	Review DRC summary and discussion in preparation for mediation.	0.20	\$255.00
03/02/24	JRBL	Review work product data and compilations in preparation of mediation strategy.	3.30	\$4,207.50
03/02/24	MCM	Work on materials in response to inquiry from mediator regarding other diocesan cases.	0.50	\$412.50
03/03/24	JRBL	Analysis of non-monetary offerings in preparation for mediation.	2.20	\$2,805.00
03/03/24	JRBL	Analysis of tort claims for mediation.	1.30	\$1,657.50
03/04/24	AMUE	Draft presentation for SteerCo meeting to prepare for mediation.	1.10	\$1,017.50
03/04/24	AMUE	Revisions to deck for mediation regarding restricted assets.	0.70	\$647.50
03/04/24	EPK	Email correspondence with C. Wiltgen of A&M regarding mediation documents protocol.	0.10	\$80.00
03/04/24	JRBL	Review press coverage of abuse cases in preparation for mediation and client meetings.	0.70	\$892.50
03/04/24	SJM	Prepare confidential header language for mediation documents.	0.30	\$225.00
03/04/24	TND	Review request from A&M on mediation confidentiality information to include in documents.	0.10	\$73.50
03/05/24	AMUE	Emails with Judge Sontchi regarding mediation.	0.40	\$370.00
03/05/24	AMUE	Prepare for mediation by review of privileged client materials highlighting information needed for mediation.	4.50	\$4,162.50
03/05/24	AMUE	Attend SteerCo meeting in preparation for mediation.	1.50	\$1,387.50
03/05/24	EPK	Email correspondence with the A&M team regarding mediation-related documents protocol.	0.10	\$80.00
03/05/24	ERR	Prepare for (.5) and attend Steering Committee meeting regarding case status and strategy regarding insurance (1.5).	2.00	\$1,950.00
03/05/24	JCH	Provide information re: Committee members to Foley group.	0.50	\$150.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 42

Foley & Lardner LLP

April 30, 2024

03/05/24	JRBL	Communication with A. Uetz regarding revision to mediation plan.	0.20	\$255.00
03/05/24	JRBL	Review spreadsheets and attorney work product in preparation for client SteerCo meeting.	3.10	\$3,952.50
03/05/24	JRBL	Communication with A. Uetz in preparation for SteerCo meeting.	0.20	\$255.00
03/05/24	MDL	Evaluate privilege applicable to documents created for mediation preparation and presentation.	0.10	\$80.00
03/05/24	TND	Prepare language for confidentiality legend for mediation documents.	0.20	\$147.00
03/06/24	AMUE	Review deck regarding restricted assets in preparation for meeting with Judge Sontchi.	0.90	\$832.50
03/06/24	AMUE	Draft memorandum to M. Kemner regarding mediation and SteerCo strategy.	1.10	\$1,017.50
03/06/24	MRL	Review pending dioceses cases to provide an update on their status to the Foley team and the client.	0.80	\$456.00
03/07/24	AAAM	Research requested arbitrator.	0.30	\$72.00
03/07/24	AMUE	Meeting with C. Moore, C. Sontchi and M. Lee regarding Debtor's assets (1.0); prepare for meeting (1.2).	2.20	\$2,035.00
03/07/24	MCM	Attention to issues regarding claims analysis requested by mediator in preparation for meetings scheduled for March 18 and 19 in San Francisco.	1.00	\$825.00
03/07/24	MCM	Email correspondence with Foley team regarding feedback from mediator on asset valuation analysis and related issues.	0.30	\$247.50
03/07/24	MDL	Telephone conference with C. Moore (A&M) and Judge C. Sontchi regarding estate asset information.	0.70	\$560.00
03/07/24	MDL	Telephone conference with C. Moore (A&M) regarding question from Judge C. Sontchi about non-estate assets.	0.10	\$80.00
03/07/24	MDL	Analyze presentation on estate assets in preparation for meeting with Judge C. Sontchi.	0.10	\$80.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 43

Foley & Lardner LLP

April 30, 2024

03/07/24	MDL	Analyze revised claims analysis presentation for use in mediation.	0.20	\$160.00
03/07/24	MDL	Email correspondence with Judge C. Sontchi regarding estate asset information.	0.10	\$80.00
03/08/24	MRL	Finalize review of pending dioceses cases to provide an update on their status to the Foley team and the client.	0.60	\$342.00
03/10/24	MDL	Draft plan term sheet in advance of joint mediation session.	2.10	\$1,680.00
03/11/24	AMUE	Obtain feedback from Judge Sontchi regarding asset discussion (.3) and communication with client leadership and C. Moore regarding next steps (.5).	0.80	\$740.00
03/11/24	AMUE	Review communication received from J. Krivis (.2) and communication with client regarding same (.2).	0.40	\$370.00
03/11/24	EPK	Email correspondence with A. Uetz regarding substantiation of restricted assets for purposes of mediation (.2); emails with C. Moore of A&M regarding same (.2); review restricted asset analysis tracker and litigation claims tracker to gather information for mediation (.4); review prior case law research on tracing of funds and assets held in trust (.2).	1.00	\$800.00
03/11/24	MCM	Attention to asset valuation issues in preparation for mediation meetings scheduled for March 18 and 19 in San Francisco.	0.40	\$330.00
03/11/24	MDL	Telephone conference with A. Uetz regarding assets available for settlement and initial mediation strategy.	1.00	\$800.00
03/11/24	MDL	Continue to draft plan term sheet in advance of joint mediation session.	0.30	\$240.00
03/12/24	AMUE	Work on strategy for first joint mediation session, including review of other case outcomes.	2.20	\$2,035.00
03/12/24	AMUE	Revisions to draft privileged presentation regarding RCBO corporate structure and assets for purposes of mediation.	1.10	\$1,017.50
03/12/24	AMUE	Draft strategy update for client leadership team following meeting with Judge Sontchi.	0.80	\$740.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 44

Foley & Lardner LLP

April 30, 2024

03/12/24	EPK	Call with A. Uetz regarding information relating to debtor/non-debtor asset holdings and related legal arguments to be prepared for mediation proceedings next week (.4); conference call with the A&M team to discuss non-debtor entity asset holdings (.9); follow-up email correspondence with the A&M team regarding asset descriptions for mediation (.2); email correspondence with A. Uetz and M. Lee regarding presentation slides for the mediator on asset holdings and restricted cash analysis (.2); confer with J. Harper regarding bankruptcy case law relating to resulting trust arguments, including review of summary prepared by J. Harper (.5); analyze property of the estate issues and supporting legal arguments for mediation process (.6); request legal research from M. Rofaail regarding property of the estate under Section 541 (.2).	3.00	\$2,400.00
03/12/24	JSH	Analyze Wilmington decision and related issues for E. Khatchatourian ahead of mediation.	0.60	\$420.00
03/12/24	KAFA	Analysis of Camden Plan of Reorganization in preparation for mediation.	0.50	\$197.50
03/12/24	MDL	Telephone conference with A. Uetz regarding preparation for asset presentation to Committee at mediation.	0.20	\$160.00
03/12/24	MRL	Confer with E. Khatchatourian regarding the issue of restricted donations (.3); research case law under sections 541(d) and (f) on whether restricted donations are property of the estate in aiding mediation talks (1.0).	1.30	\$741.00
03/13/24	AMUE	Prepare for meeting with Judge Newsome and T. Gallagher (.7); initial meeting with Judge Newsome and T. Gallagher (.5).	1.20	\$1,110.00
03/13/24	EPK	Develop arguments to support restricted assets and related property of the estate issues (1.3); email correspondence with J. Kohout regarding analysis of exemplary donative intent documents (.2); follow up with M. Rofaail regarding property of the estate research (.2); preliminary review of mediation presentation slides on non-debtor assets prepared by the A&M team (.2).	1.90	\$1,520.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 45

Foley & Lardner LLP

April 30, 2024

03/13/24	MCM	Attention to asset valuation issues in preparation for mediation meetings scheduled for March 18 and 19 in San Francisco.	0.40	\$330.00
03/13/24	MDL	Telephone conference with A. Uetz regarding deliverables to insurance mediators and strategies for mediation of insurance issues.	0.20	\$160.00
03/13/24	MDL	Telephone conference with A. Uetz (Foley) and the two insurance mediators (T. Gallagher, R. Newsome) regarding issues in adversary proceeding and potential bases for resolution with insurers.	0.70	\$560.00
03/13/24	MRL	Research case law under sections 541(d) and (f) on whether restricted donations are property of the estate in aiding mediation talks (5.7); email correspondence with E. Khatchatourian regarding the case law for the research (.3).	6.00	\$3,420.00
03/14/24	AMUE	Prepare for mediation by review of a privileged issue and Debtor's position regarding same.	3.20	\$2,960.00
03/14/24	EPK	Follow up with A. Uetz and M. Lee regarding asset analysis presentation slides for mediation process (.2); review property of the estate research summary prepared by M. Rofaail (.3); coordinate with M. Rofaail regarding mediation slides summarizing property of the estate arguments and development of supporting arguments (.6); follow up with J. Kohout regarding state law analysis in support of property subject to donative restrictions, including review of slides discussing charitable donations law (.3); work on editing, refining, and updating mediation presentation slides on non-Debtor Catholic Entity assets and funds held in trust for others (1.2).	2.60	\$2,080.00
03/14/24	JCH	Email correspondence with A. Uetz regarding parties listed on mediation attendee list.	0.20	\$60.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 46

Foley & Lardner LLP

April 30, 2024

03/14/24	MRL	Finalize research for case law under sections 541(d) and (f) on whether restricted donations are property of the estate in aiding mediation talks (2.7); create a PowerPoint of the research regarding property of the estate with the application of the facts in preparation for the presentation to the mediator (2.6); email correspondence with E. Khatchatourian regarding the research for the PowerPoint (.3).	5.60	\$3,192.00
03/15/24	AMUE	Prepare for upcoming mediation sessions on 3/18 and 3/19.	3.00	\$2,775.00
03/15/24	DMH	Attend strategy call with E. Ridley to strategize approach for preparing claims valuation ahead of mediation.	1.00	\$475.00
03/15/24	DMH	Analyze each RCBO claim for alleged occurrences, policy limits, and perpetrator information to prepare client update ahead of mediation.	7.90	\$3,752.50
03/15/24	EPK	Call with S. Levitt of A&M to discuss mediation presentation slides and preliminary comments to same (.3); post-call email correspondence with S. Levitt regarding financial data for certain slides (.2).	0.50	\$400.00
03/15/24	EPK	Extensive work on the mediation presentation slides on non-debtor assets and related legal arguments (3.4); email correspondence with Foley and A&M teams regarding same (.2); confer with J. Kohout regarding restricted cash analysis for the presentation slides (.1).	3.70	\$2,960.00
03/15/24	JCH	Revise contact list regarding insurance mediation.	0.50	\$150.00
03/15/24	JJK	Review restriction information for presentation.	0.80	\$700.00
03/15/24	MCM	Email correspondence with Foley team regarding slide decks for presentation to mediator and revisions to same (.3); analyze issues in connection with valuation of insurance assignment in Camden case or lack thereof (.5); prepare for mediation scheduled for March 18 and 19 in San Francisco (.4).	1.20	\$990.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 47

Foley & Lardner LLP

April 30, 2024

03/15/24	MRL	Review pending dioceses cases to provide an update on their status to the Foley team and the client.	1.00	\$570.00
03/15/24	MRL	Email correspondence with E. Khatchatourian regarding the research for the PowerPoint.	0.20	\$114.00
03/16/24	AMUE	Prepare talking points for mediation (.9); work on term sheet for mediation (.6).	1.50	\$1,387.50
03/16/24	EPK	Email correspondence with the Foley and A&M teams regarding comments to the mediation presentation slides (.4); revise presentation slides to incorporate additional factual background, analysis, and data points (2.8).	3.20	\$2,560.00
03/17/24	AMUE	Review term sheet summary prepared by S. Moses (.4); email client leadership team regarding mediation term sheet (.5).	0.90	\$832.50
03/17/24	AMUE	Revise opening talking points for M. Kemner for mediation (.9); three email communications with M. Kemner regarding documents to provide to Judge Sontchi at mediation (.5); outline presentation regarding restricted assets for mediation (1.0).	2.40	\$2,220.00
03/17/24	EPK	Email correspondence with A. Uetz and C. Moore regarding revisions to the mediation presentation slides on property of the estate issues (.4); review revised and proposed final mediation presentation slides (.2).	0.60	\$480.00
03/17/24	MDL	Evaluate Committee's initial term sheet.	0.30	\$240.00
03/17/24	MDL	Revise outline of presentation to Judge Sontchi for March 18 mediation session.	1.60	\$1,280.00
03/17/24	MDL	Evaluate insurance-neutral terms in other mass tort plans of reorganization.	1.60	\$1,280.00
03/17/24	SJM	Draft summary of Committee term sheet.	1.50	\$1,125.00
03/18/24	AMUE	Prepare for mediation (1.5); attend mediation session with Judge Sontchi, client and Committee professionals (8.0).	9.50	\$8,787.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 48

Foley & Lardner LLP

April 30, 2024

03/18/24	EPK	Review documents and analyses to prepare the Foley team for mediation-related inquiries concerning restricted assets and the Oakland Parochial Fund (.8); organize mediation arguments (.3).	1.10	\$880.00
03/18/24	MCM	Attend mediation meetings in San Francisco with Committee and Foley teams and client parties.	8.00	\$6,600.00
03/18/24	MDL	Appear for the Debtor in first day of two-day mediation session with Judge Christopher Sontchi.	7.80	\$6,240.00
03/18/24	MDL	Prepare for first day of two-day mediation session with Judge Christopher Sontchi.	0.60	\$480.00
03/18/24	MRL	Email correspondence with E. Khatchatourian regarding preparing notes on section 541(f) (.3); draft document of notes on section 541(f) in aiding mediation (.7).	1.00	\$570.00
03/19/24	AMUE	Attend mediation session with Committee (6.5); debrief with client leadership team (1.0).	7.50	\$6,937.50
03/19/24	JCH	Revise contact list regarding insurance mediation and email same to A. Uetz.	0.50	\$150.00
03/19/24	MCM	Attend mediation in San Francisco with Committee and client parties (partial).	4.00	\$3,300.00
03/19/24	MDL	Prepare for mediation session (2.2) Appear for Debtor at second day of two-day mediation (6.5).	8.70	\$6,960.00
03/20/24	AMUE	Review email received from Judge Sontchi (.3) and respond to same in follow up to mediation session (.3); review additional email received from Judge Sontchi (.2); review information regarding property issues (.5).	1.30	\$1,202.50
03/20/24	AMUE	Analyze other case outcomes in diocese cases.	1.10	\$1,017.50
03/20/24	EPK	Review supplemental property of the estate analysis prepared by M. Rofaail in connection with the mediation process.	0.20	\$160.00
03/21/24	AMUE	Review analysis regarding other case outcomes for purposes of mediation (.8); draft privileged email regarding same (.6).	1.40	\$1,295.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 49

Foley & Lardner LLP

April 30, 2024

03/21/24	AMUE	Multiple (4+) email communications with Bishop Barber and client team regarding mediation (.8); telephone conference with B. Weisenberg regarding mediation (.2).	1.00	\$925.00
03/21/24	MCM	Attention to post-mediation requests for information on other diocesan bankruptcy cases from mediator.	1.50	\$1,237.50
03/21/24	MRL	Review pending dioceses cases to provide an update on their status to the Foley team and the client.	0.60	\$342.00
03/22/24	AMUE	Email communication with B. Weisenberg (.2) and with J. Prol (.1) regarding mediation.	0.30	\$277.50
03/22/24	MCM	Attention to post-mediation requests for information on other diocesan bankruptcy cases from mediator (.8); email memorandum to Foley team regarding same (.5).	1.30	\$1,072.50
03/22/24	MRL	Finalize reviewing pending dioceses cases to provide an update on their status to the Foley team and the client.	0.70	\$399.00
03/25/24	AMUE	Meeting with Judge Sontchi and counsel for the Committee regarding mediation.	0.40	\$370.00
03/25/24	AMUE	Multiple (3+) email communications with client leadership team regarding mediation.	0.70	\$647.50
03/25/24	MCM	Attention to preparation for continued mediation.	0.40	\$330.00
03/26/24	AMUE	Telephone meeting with M. Kemner regarding mediation strategy (.7); work on review of certain claims information to inform mediation strategy (.9); outline recommendation to client leadership regarding mediation strategy (1.1); review information regarding certain real estate assets to inform mediation strategy (1.1).	3.80	\$3,515.00
03/26/24	MCM	Review draft email correspondence with client parties regarding continuation of discussions with Committee and potential counter offer (.3); telephone conference with A. Uetz regarding same (.4); attention to issues concerning counter settlement offer to Committee (.3).	1.00	\$825.00
03/26/24	MDL	Evaluate terms of Debtor's counter-proposal to Committee.	0.20	\$160.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 50

Foley & Lardner LLP

April 30, 2024

03/27/24	AMUE	Email communication with Judge Sontchi (.3); communications with M. Kemner regarding internal deliverables for next mediation (.6); develop strategy regarding next proposal (1.1).	2.00	\$1,850.00
03/27/24	MCM	Prepare for continued mediation in April in San Francisco.	0.50	\$412.50
03/28/24	AMUE	Communication to client leadership team regarding mediation (.5) and communication with Foley team regarding mediation strategy (.3).	0.80	\$740.00
03/28/24	AMUE	Communication with M. Kemner regarding privileged mediation issue (.8); draft communication to client leadership team regarding confidential mediation issue (1.1); communication with Judge Sontchi regarding mediation (.4).	2.30	\$2,127.50
03/28/24	EPK	Confer with A. Uetz regarding comprehensive analysis of corporate structure of the legal entities within the Diocese of Oakland for purposes of mediation process.	0.20	\$160.00
03/28/24	MCM	Conference call with A. Uetz regarding counter-offer to Committee for mediation and related issues (.4); review email correspondence regarding same (.2); attention to potential production to Committee of back-up analysis on claims and claim objections (.4).	1.00	\$825.00
03/28/24	MRL	Review pending dioceses cases to provide an update on their status to client.	0.30	\$171.00
03/28/24	MRL	Research whether a bankruptcy filing tolls a statute of limitation in regards to the claims that did not file a state court complaint.	3.70	\$2,109.00
03/28/24	TFCA	Review updated counter-offer email.	0.20	\$265.00
03/29/24	AMUE	Communication with Judge Sontchi regarding mediation.	0.40	\$370.00
03/29/24	EPK	Begin to distill prior corporate structure analyses into summary form for mediation process.	0.30	\$240.00
03/29/24	MRL	Review pending dioceses cases to provide an update on their status to client.	0.50	\$285.00

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 51

Foley & Lardner LLP

April 30, 2024

03/30/24	MRL	Finalize review of pending dioceses cases to provide an update on their status to the Foley team.	0.80	\$456.00
----------	-----	---	------	----------

Task Total:	187.70	\$156,026.00
-------------	--------	--------------

Services Total:	561.30	\$410,027.50
-----------------	--------	--------------

Professional Services Summary

Service Provider	Initials	Title	Hours	Rate	Amount
Dania Abbasi	DAAB	Associate	42.80	\$630.00	\$26,964.00
Emmaline S. Jurgena	ESJ	Associate	6.50	\$630.00	\$4,095.00
Jose A. Lazaro	JAL	Associate	2.30	\$600.00	\$1,380.00
Joseph S. Harper	JSH	Associate	14.60	\$700.00	\$10,220.00
Kirsten R. Dedrickson	KRD	Associate	5.80	\$685.00	\$3,973.00
Mason Roberts	MR	Associate	3.50	\$690.00	\$2,415.00
Mary Rofaeil	MRL	Associate	34.40	\$570.00	\$19,608.00
Mikaela R. Mitcham	MRM	Associate	1.00	\$570.00	\$570.00
Stephanie McPhail	SMP	Associate	1.40	\$630.00	\$882.00
Shane J. Moses	SJM	Of Counsel	32.40	\$750.00	\$24,300.00
Angela A. Henes	AAAM	Other	0.30	\$240.00	\$72.00
Janelle C. Harrison	JCH	Paralegal	32.80	\$300.00	\$9,840.00
Kerry A. Farrar	KAFA	Paralegal	18.10	\$395.00	\$7,149.50
Adam J. Hepworth	AJHE	Partner	0.20	\$775.00	\$155.00
Ann Marie Uetz	AMUE	Partner	97.60	\$925.00	\$90,280.00
Emil P. Khatchatourian	EPK	Partner	42.60	\$800.00	\$34,080.00
Eileen R. Ridley	ERR	Partner	20.50	\$975.00	\$19,987.50
Jason J. Kohout	JJK	Partner	2.90	\$875.00	\$2,537.50
Jonathan P. Witt	JPWI	Partner	1.70	\$800.00	\$1,360.00
Jeffrey R. Blease	JRBL	Partner	17.50	\$1,275.00	\$22,312.50
Mark C. Moore	MCM	Partner	51.30	\$825.00	\$42,322.50
Matthew D. Lee	MDL	Partner	46.50	\$800.00	\$37,200.00
Thomas F. Carlucci	TFCA	Partner	1.40	\$1,325.00	\$1,855.00
Matthew S. Kiel	MSK	Senior Counsel	2.60	\$775.00	\$2,015.00
Robert T. Stewart	RTST	Senior Counsel	7.00	\$740.00	\$5,180.00
Daniyal M. Habib	DMH	Special Counsel	54.30	\$475.00	\$25,792.50
Tamar N. Dolcourt	TND	Special Counsel	17.10	\$735.00	\$12,568.50

ROMAN CATHOLIC BISHOP OF OAKLAND

Our Ref. No.:100845-0402

Invoice No.: 50828972

Page 52

Foley & Lardner LLP

April 30, 2024

Kevin T. Lewman	KTLE	Technical Specialist	2.20	\$415.00	\$913.00
Totals			561.30		\$410,027.50

Expenses Incurred

Description	Amount
Electronic Legal Research Services	\$1,722.30
LSS - eDiscovery Services	\$3,600.00
Other Fees	\$3.05
Recording / Filing Fees	\$90.30
Expenses Incurred Total	\$5,415.65

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

Electronic Legal Research Services

Date	Initials	Description	Amount
03/31/24	MCM	Docket Report. US RESTATEMENTS DOC ACCESS. US TREATISES DOC ACCESS. Search. US JURISPRUDENCE DOC ACCESS. US LAW REVIEWS AND JOURNALS DOC ACCESS. SEARCH ACCESS CHARGE. Westlaw. US MOTIONS DOC ACCESS.	\$1,722.30

LSS - eDiscovery Services

Date	Initials	Description	Amount
03/31/24	JRBL	LSS - eDiscovery Services.	\$3,600.00

Other Fees

Date	Initials	Description	Amount
03/31/24	25241	Certificate of Good Standing--VENDOR: U.S. BANK 03/04/24 Wisconsin Certificate of Good Standing (100845-0402) (M. Lee) -.	\$3.05

Recording / Filing Fees

Date	Initials	Description	Amount
02/23/24	JRBL	ACE ATTORNEY SERVICE, INC. - Filing - 02/23/24.	\$90.30

Expense Total:	<hr/> \$5,415.65
----------------	------------------