

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION**

In re:

ROMAN CATHOLIC DIOCESE OF
HARRISBURG,

Debtor.¹

Chapter 11

Case No. 1:20-bk-00599 (HWV)

**FOURTEENTH MONTHLY FEE STATEMENT OF
KEEGAN LINSOTT & ASSOCIATES, PC, FOR ALLOWANCE OF
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS FINANCIAL ADVISOR TO THE DEBTOR
FOR THE PERIOD OF APRIL 1, 2021 THROUGH APRIL 30, 2021**

Name of Applicant	Keegan Linscott & Associates, PC
Authorized to provide professional services to	Debtor and Debtor-in-Possession
Effective Date of Retention	May 26, 2020, <i>nunc pro tunc</i> to February 19, 2020 (the " <i>Petition Date</i> ")
Period for which compensation and reimbursement are sought	April 1, 2021 through April 30, 2021
Amount of Compensation sought as actual, reasonable and necessary	\$19,931.50
Amount of Expense Reimbursement sought as actual, reasonable and necessary	\$0
Total Amount Sought	\$19,931.50
Total Amount of Compensation (at 80%) and Expenses (at 100%) authorized to be paid per monthly fee applications	\$15,945.20
Blended Rate for all Professionals	\$201.53
Blended Rate for all Timekeepers	\$201.53

¹ The last four digits of the Debtor's federal tax identification number are: 4791. The Debtor's principal place of business is located at 4800 Union Deposit Road, Harrisburg, Pennsylvania 17111.

1. Pursuant to sections 327, 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 121] (the “**Interim Compensation Order**”), the Keegan Linscott & Associates, PC (“**KLA**”), financial advisor to the Roman Catholic Diocese of Harrisburg, as debtor and debtor in possession (the “**Debtor**”), hereby files this monthly fee statement (the “**Monthly Fee Statement**”) for (a) compensation in the amount of \$15,945.20 for the reasonable and necessary services KLA rendered to the Debtor from April 1, 2021 through and including April 30, 2021 (the “**Compensation Period**”) (80% of \$19,931.50) and (b) reimbursement for 100% of the actual and necessary expenses that KLA incurred, in the amount of \$0 during the Compensation Period.

Services Rendered and Disbursements Incurred

2. Attached as **Exhibit A** is a billing summary of KLA professionals and paraprofessionals by individual, setting forth the (a) name and title of each individual who performed services during the Compensation Period, (b) aggregate time expended by each such individual, (c) hourly billing rate for each such individual, and (d) amount of fees earned by each KLA professional and paraprofessional.

3. Attached as **Exhibit B** is a summary of hours and fees by task code.

4. Attached as **Exhibit C** is a summary of reimbursement sought by expense type for all expenses for the Compensation Period incurred in connection with the performance of professional services.

5. Attached as **Exhibit D** is KLA’s itemized time records of its professionals and paraprofessionals and itemized records of reimbursement sought for the Compensation Period.

Reservations

6. This Monthly Fee Statement includes all the information and supporting detail regarding fees and expenses available to KLA at the time of the filing of this Monthly Fee Statement. If additional information and supporting detail in connection with this Compensation Period should become available, as a result of delays in accounting processing or an inadvertence with respect to time entered in the accounting system, or any other valid reason, KLA reserves the right to make an application to the Court for an allowance of such fees and expenses not included in this Monthly Statement.

Notice

7. Pursuant to the Interim Compensation Order, notice of this Monthly Fee Statement shall be served upon:

- a. the Debtor, the Roman Catholic Diocese of Harrisburg, Attn: Fr. David L. Danneker, 4800 Union Deposit Road, Harrisburg, PA 17111, frddanneker@hbgdiocese.org;
- b. counsel to the Debtor, Waller, Lansden, Dortch & Davis, LLP, Attn: Blake D. Roth, 511 Union Street, Suite 2700, Nashville, TN 37219, blake.roth@wallerlaw.com;
- c. counsel to the Official Committee of Tort Claimants, Stinson, LLP, Attn: Robert T. Kugler and Edwin H. Caldie, 50 South Sixth Street, Suite 2600, Minneapolis, MN 55402, robert.kugler@stinson.com and ed.caldie@stinson.com; and
- d. the Office of the United States Trustee, Attn: Troy Sellars and Gregory Schiller, 228 Walnut Street, Suite 1190, Harrisburg, PA 17101, d.troy.sellars@usdoj.gov and Gregory.b.schiller@usdoj.gov.

WHEREFORE, KLA, in connection with services rendered on behalf of the Debtor, respectfully requests (a) allowance of compensation and reimbursement in the amount of (i) \$15,945.20 for reasonable and necessary professional services rendered (80% of \$19,931.50) and (ii) \$0 for 100% of actual and necessary costs and expenses incurred during the Compensation Period, for a total of \$15,945.20 and (b) payment of the forgoing sums.

Dated: May 24, 2021
Nashville, Tennessee

Respectfully submitted,

WALLER LANSDEN DORTCH & DAVIS, LLP

/s/ Blake D. Roth

Blake D. Roth (State Bar No. 306951)
Tyler N. Layne (admitted *pro hac vice*)
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Nashville, TN 37219
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-and-

KLEINBARD, LLC

Matthew H. Haverstick (State Bar No. 85072)
Joshua J. Voss (State Bar No. 306853)
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Philadelphia, Pennsylvania 19103
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jvoss@kleinbard.com

Attorneys for the Debtor and Debtor In Possession

EXHIBIT A

COMPENSATION BY PROFESSIONAL

Name	Position/Start Date/License Date	Effective Billing Rate	Bill Hours	Billed Amount
Conan Bardwell	Supervisor/2008/2013	\$185.00	88.0	\$16,280.00
John Gordon	Manager/2008/1980	—	—	—
Christopher Linscott	Director/1994/1984	\$335.00	10.9	\$3,651.50
Stacy Thompson	Manager/2008/2010	—	—	—
Laura Carrera	Paraprofessional/2010	—	—	—
		Totals	98.9	\$19,931.50

EXHIBIT B

COMPENSATION BY PROJECT CATEGORY

	Hours	Amount
Case Administration	85.1	\$15,833.50
Data Entry & Accounting	—	—
Data Analyses	—	—
Business Analysis	10.6	\$3,026.00
Business Operations	—	—
Travel	—	—
Court Appearance	—	—
Claims Administration	3.2	\$1,072.00
Fee Application	—	—
Total	98.9	\$19,931.50

EXHIBIT C

EXPENSE SUMMARY

Expense Category	Amount
Total	0

EXHIBIT D

TIME DETAIL

Keegan Linscott & Associates, PC
3443 N. Campbell Avenue, Suite 115
Tucson, AZ 85719

Mr. Blake D. Roth
Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
Nashville, TN 37219

Re: Diocese of Harrisburg

05/04/2021
Invoice Number 43704

Billing for professional services rendered in April 2021 as follows (detail attached):

Current Amount Due \$ 19,931.50

Diocese of Harrisburg						April 2021
Last Name	WIP Date	Reference	Hours	Rate	Fee	Service Description
Bardwell	4/1/2021	Work on February Monthly Operating Report	9.00	\$ 185.00	\$ 1,665.00	Case Administration
Bardwell	4/2/2021	Work on February Monthly Operating Report	8.50	\$ 185.00	\$ 1,572.50	Case Administration
Bardwell	4/5/2021	Work on February Monthly Operating Report	9.00	\$ 185.00	\$ 1,665.00	Case Administration
Bardwell	4/6/2021	Work on February Monthly Operating Report	6.00	\$ 185.00	\$ 1,110.00	Case Administration
Bardwell	4/8/2021	Work on 2022 budget and cash flow projections	2.00	\$ 185.00	\$ 370.00	Business Analysis
Bardwell	4/9/2021	Call with Chris, Don and Chad on 2022 budget and cash flow projections	1.50	\$ 185.00	\$ 277.50	Business Analysis
Bardwell	4/19/2021	Work on March Monthly Operating Report	3.00	\$ 185.00	\$ 555.00	Case Administration
Bardwell	4/21/2021	Work on March Monthly Operating Report	4.50	\$ 185.00	\$ 832.50	Case Administration
Bardwell	4/23/2021	Work on March Monthly Operating Report	5.00	\$ 185.00	\$ 925.00	Case Administration
Bardwell	4/26/2021	Work on March Monthly Operating Report	10.00	\$ 185.00	\$ 1,850.00	Case Administration
Bardwell	4/27/2021	Work on March Monthly Operating Report	7.50	\$ 185.00	\$ 1,387.50	Case Administration
Bardwell	4/28/2021	Work on March Monthly Operating Report	8.50	\$ 185.00	\$ 1,572.50	Case Administration
Bardwell	4/29/2021	Work on March Monthly Operating Report	6.00	\$ 185.00	\$ 1,110.00	Case Administration
Bardwell	4/30/2021	Work on March Monthly Operating Report	7.50	\$ 185.00	\$ 1,387.50	Case Administration
		Bardwell	88.00		\$ 16,280.00	
Linscott	4/2/2021	Review February MOR	0.60	\$ 335.00	\$ 201.00	Case Administration
Linscott	4/2/2021	Work on insurance analysis by carrier, related call with Blake	2.00	\$ 335.00	\$ 670.00	Claims Administration
Linscott	4/5/2021	Meet with Conan on insurance and claims schedule and requests updates	0.20	\$ 335.00	\$ 67.00	Claims Administration
Linscott	4/6/2021	Review insurance/claim spreadsheet updates, review parish and school information from Don	0.40	\$ 335.00	\$ 134.00	Business Analysis
Linscott	4/7/2021	Call with Blake on Plan projections and related analysis, settlement matters. Related call with Don and Chad, email to Father Danneker.	1.50	\$ 335.00	\$ 502.50	Business Analysis
Linscott	4/8/2021	Work with Conan on cash flow projections	2.50	\$ 335.00	\$ 837.50	Business Analysis
Linscott	4/9/2021	Call with Don, Chad and Conan on projections	1.50	\$ 335.00	\$ 502.50	Business Analysis
Linscott	4/20/2021	Work on claims issues	0.40	\$ 335.00	\$ 134.00	Claims Administration
Linscott	4/28/2021	Call with Blake on mediation matters	0.20	\$ 335.00	\$ 67.00	Claims Administration
Linscott	4/28/2021	Review non-monetary Child Protection Protocols from creditors committee	0.40	\$ 335.00	\$ 134.00	Claims Administration
Linscott	4/28/2021	Status call regarding mediation and Plan matters with management and counsel	1.20	\$ 335.00	\$ 402.00	Business Analysis
		Linscott	10.90		\$ 3,651.50	
		Grand Total	98.90		\$ 19,931.50	