

REED SMITH LLP
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REED SMITH LLP
Timothy P. Law, Esq. (admitted *pro hac vice*)
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Three Logan Square, Suite 3100
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Telephone: (215) 851-8100
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E-mail: tlaw@reedsmith.com

*Special Insurance Counsel for Debtor
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,¹

Debtor.

Chapter 11

Case No. 20-12345 (SCC)

**TWELFTH MONTHLY STATEMENT OF REED SMITH LLP, AS
SPECIAL INSURANCE COUNSEL FOR THE DEBTOR AND DEBTOR IN POSSESSION,
OF FEES FOR PROFESSIONAL SERVICES RENDERED AND
DISBURSEMENTS INCURRED FOR THE PERIOD
SEPTEMBER 1, 2021 THROUGH SEPTEMBER 30, 2021**

Name of Applicant:	Reed Smith LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	Order entered on November 4, 2020, <i>nunc pro tunc</i> to October 1, 2020
Period for which compensation and reimbursement is sought:	September 1, 2021 to September 30, 2021
Amount of Compensation sought as actual, reasonable and necessary:	\$231,893.50 80% of which is \$185,514.80

¹ The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue P.O. Box 9023, Rockville Centre, NY 11571-9023.

Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$501.33
TOTAL (80% of fees and 100% of costs)	\$186,016.13

Reed Smith LLP ("Reed Smith"), as Special Insurance Counsel for the Debtor and Debtor-In Possession, hereby submits this twelfth monthly statement (the "Monthly Statement") for the period of September 1, 2021 through September 30, 2021 (the "Statement Period") for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court's Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 129] (the "Fee Procedures Order"). Reed Smith requests: (a) interim allowance and payment of compensation in the amount of \$185,514.80 (80% of \$231,893.50) of fees on account of reasonable and necessary professional services rendered to the Debtor by Reed Smith and (b) reimbursement of actual and necessary costs and expenses in the amount of \$501.33 incurred by Reed Smith during the Statement Period.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Reed Smith professionals and paraprofessionals who provided services to the Debtor during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Debtor during the Statement Period.

Name	Title	Department	Office	JD Year	Rate	Hours	Amount
Law, Timothy	Equity Partner	Litigation	Philadelphia	1995	995	50.2	\$49,949.00
Kramer, Ann	Fix.Sh.Partner	Litigation	New York	1984	1,225	4.2	\$5,145.00
Berringer, John	Counsel	Litigation	New York	1980	1,130	113.7	\$128,481.00
Lynch, Christopher	Counsel	Business and Finance	New York	2003	880	12.9	\$11,352.00
Kim, Esther Y.	Associate	Litigation	Philadelphia	2018	535	213	\$11,395.50
Kraus, Jessica E.	New Associate	New Associates	Philadelphia	2021	495	5.2	\$2,574.00
LauKamg, Christopher	Paralegal	Business and Finance	New York	-	350	25.2	\$8,820.00
Simmonds, Lianna E.	Paralegal	Litigation	Philadelphia	-	290	0.4	\$116.00
Sooy, Nora	Paralegal	Litigation	Philadelphia	-	380	0.6	\$228.00
Schad, James	Other	Litigation	Tysons	-	530	26.1	\$13,833.00
						259.8	\$231,893.50
TOTAL:						259.8	\$231,893.50

2. The rates charged by Reed Smith for services rendered to the Debtor are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients as described in the engagement letter between Reed Smith and the Debtor. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A.**

EXPENSES INCURRED DURING THE STATEMENT PERIOD

3. Set forth below is a categorical list of expenses incurred by Reed Smith during the Statement Period in the course of representing the Debtor.

Description	Amount
T. Law PA Certificate of Good Standing Fee	\$25.00
T. Law NJ Certificate of Good Standing Fee	\$20.00
Courier Service - Outside	\$31.55
Duplicating/Printing/Scanning	\$1.20
USBC SDNY J. Berringer August 9, 2021 Mediation Status Conference Appearance Fee	\$70.00
USBC SDNY T. Law August 9, 2021 Mediation Status Conference Appearance Fee	\$70.00
USBC SDNY J. Berringer August 19, 2021 Hearing Appearance Fee	\$70.00
USBC SDNY J. Berringer August 23, 2021 Hearing Appearance Fee	\$70.00
USBC SDNY T. Law August 23, 2021 Hearing Appearance Fee	\$70.00
USBC SDNY J. Berringer September 23, 2021 Hearing Appearance Fee	\$70.00
Postage Expense	\$3.12
Telephone - Outside	\$0.46
TOTAL:	\$501.33

NOTICE AND OBJECTION PROCEDURES

4. Reed Smith has provided notice of this statement upon the following parties by electronic or first class mail: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); and (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 36th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 11th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.).

5. Pursuant to the Fee Procedures Order, objections to this Monthly Statement, if any, must be served no later than **October 28, 2021** (the “Objection Deadline”) upon the following parties: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 36th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 11th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.); and (v) Special Insurance Counsel,

Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Christopher A. Lynch, Esq. and John B. Berringer, Esq.) and Reed Smith LLP, 1717 Arch Street, Three Logan Square, Suite 3100, Philadelphia, PA 19103 (Attn: Timothy P. Law, Esq.).

6. If no objections to this Monthly Statement are received by the Objection Deadline, the Debtor will be authorized thereafter to pay Reed Smith 80% of the fees and 100% of the expenses identified in the Monthly Statement.

7. To the extent an objection to the Monthly Statement is received on or before the Objection Deadline, the Debtor will withhold payment of that portion of the Monthly Statement to which the objection is directed and is authorized to pay the remainder of fees and expenses in the percentages set forth above. To the extent such objection is not resolved, it shall be preserved and presented to the Court at the next interim or final fee application hearing to be heard in accordance with paragraph 2(k) of the Fee Procedures Order.

Dated: October 13, 2021
New York, New York

REED SMITH LLP

/s/ Christopher A. Lynch
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-and-

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EXHIBIT A



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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3440794**
Invoice Date: **10/12/2021**
Client Number: **504893**
Matter Number: **504893.60005**

REMITTANCE PAGE
PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Chapter 11 Insurance Recovery

Total Current Fees.....	\$	230,317.50
Total Current Expenses and Other Charges	\$	501.33
Total Due This Invoice:	\$	<u>230,818.83</u>

Please Remit to:

Mail To:
Reed Smith LLP
P.O. Box 360110
Pittsburgh, PA 15251-6110

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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Invoice Number: **3440794**
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RE: Chapter 11 Insurance Recovery

INVOICE SUMMARY

Total Current Fees.....	\$ 230,317.50
Total Current Expenses and Other Charges	\$ 501.33
Total Due This Invoice:	\$ <u>230,818.83</u>

Please Remit to:

Mail To:
Reed Smith LLP
P.O. Box 360110
Pittsburgh, PA 15251-6110

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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Invoice Number: **3440794**
Invoice Date: **10/12/2021**
Client Number: **504893**
Matter Number: **504893.60005**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH September 30, 2021

Date	Timekeeper	Description	Hours
08/06/21	A. Kramer	Conference call with Jones Day and RS teams with creditors counsel re mediator selection	0.50
09/01/21	A. Kramer	Bi-weekly WiP call with client, Jones Day and RS Teams re Arrowood issues, claim review and parish issues	0.80
09/01/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.30
09/01/21	J.B. Berringer	Arrangements for t/c M. Burnett (.30); bi-weekly t/c team regarding claim review, Arrowood (.80); t/c M. Burnett re valuation project (.60); review email, spreadsheets re claims sorted by policy period (.80); email Burnett re same (.30); review email from B. Rosenblum re Burnett (.20); review email from W. Chapin re Ark 541 (.30); email E. Sorenson re same (.10).	3.40
09/01/21	T.P. Law	Discuss LMI coverage letter with Reed Smith team.	0.40
09/01/21	T.P. Law	Participate in work in progress call with attorney and expert team.	1.20
09/02/21	E. Y. Kim	Draft opposition brief to LMI's motion to access all proofs of claim.	4.50
09/02/21	J.B. Berringer	T/C insurance companies and claimants re mediator selection (.60); t/c E. Joyce re same (.30); emails with T. Law, B. Rosenblum re same (.40); review emails from T. Law, B. Rosenblum	3.60



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Date	Timekeeper	Description	Hours
		re Judge Welsh (.40); review Camp Immaculata COI and new Complaint (.60) email W. Chapin re same (.20); review personnel files for perpetrators (1.10)	
09/02/21	T.P. Law	Telephone conference with Esther Kim re: response to LMI motion for access to all proofs of claim.	0.50
09/02/21	T.P. Law	Email exchange with Russ Roten re: outrageous comment relating to unsubstantiated allegation of bias of Judge Welsh.	0.50
09/02/21	T.P. Law	Telephone conference with insurance companies and claimants about mediator candidates.	0.60
09/02/21	T.P. Law	Prepare charts of claims for Arrowood to show what claims fall within Arrowood's policy period.	0.40
09/03/21	C.A. Lynch	Emails RS team regarding LMI order.	0.20
09/03/21	J.B. Berringer	Review decision re withdrawing the reference (.60); email to team re same (.20); review emails from team re same (.30); review email from W. Chapin re coverage for Mercy First (.50); email W. Chapin re same (.30); review email from P. McNamara re Cronan decision (.20); email team re same (.10).	2.20
09/07/21	T.P. Law	Address counsel list for LMI action.	0.30
09/07/21	T.P. Law	Address entry of appearance in LMI District Court action.	0.30
09/07/21	T.P. Law	Begin joint letter to Judge Cronan re: discovery plan.	1.40
09/07/21	T.P. Law	Draft and circulate to team detailed email re: Russ Roten claims of "relationship" between Judge Welsh and Reed Smith.	1.00
09/07/21	J.B. Berringer	Review CVA Merits documents re Brown, Mc Gann, McComiskey, Ribaud (4.80); email team re excess insurers' request for a stip. re motion to withdraw the reference (.50)	5.30
09/07/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY	0.60



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Date	Timekeeper	Description	Hours
		adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	
09/07/21	C.A. Lynch	Emails Berringer, Law, Kramer regarding LMI order, procedures and deliverables required thereby.	0.50
09/07/21	C.A. Lynch	Review decision issued withdrawing reference of adversary proceeding as against LMI.	0.70
09/07/21	E. Y. Kim	Draft, revise opposition brief to LMI's motion to access all proofs of claim.	5.20
09/07/21	C.A. Lynch	Review/analyze initial pretrial order in LMI removed action.	0.40
09/08/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.30
09/08/21	J.C. Schad	Research (0.3), extract (0.2), restore (1.0), notate (1.1) and record (.4); document files from Diocesan archives re certain individuals.	3.00
09/08/21	J.B. Berringer	Review of CVA Merits documents re Ribauda, Melton, Placa (3.90); email team re same (.50); review emails re team conference call (.20); email insurer re meet & confer (.40);	5.00
09/08/21	E. Y. Kim	Revise opposition brief to LMI's motion to access all proofs of claim.	4.80
09/09/21	T.P. Law	Review and approve communication from Jones Day to Arrowood re: document portal.	0.20
09/09/21	T.P. Law	Draft joint discovery plan letter to Judge Cronan.	4.50
09/09/21	T.P. Law	Telephone conference with Reed Smith and Jones Day team re: open insurance issues.	0.60
09/09/21	T.P. Law	Meet and confer with LMI re: discovery plan.	0.80
09/09/21	J.B. Berringer	T/C team re outstanding insurance issues (1.40); t/c T. Law re meet & confer with insurers (.40); meet & confer with LMI coverage position (.60);	5.30



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Date	Timekeeper	Description	Hours
		review and revisions to draft Joint Letter to Judge Cronan (.60); email to T. Law re same (.20); review of new claims coverage position letters from LMI (2.10).	
09/10/21	C.M. LauKamg	Arrange J. Berringer September 13, 2021 telephonic hearing appearance and circulate confirmation of same.	0.40
09/10/21	C.M. LauKamg	Finalize USDC SDNY Joint Letter and Proposed Case Management Plan in preparation for electronic filing.	0.40
09/10/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.60
09/10/21	T.P. Law	Draft potential replies to Roten re: allegations of "relationship" between Judge Welsh and Reed Smith.	0.80
09/10/21	T.P. Law	Finalize draft letter to Judge Cronan (1.7); and circulate to LMI and the UCC insurance counsel (.30).	2.00
09/10/21	T.P. Law	Telephone conference with Jim Schad, Nora Sooy, and John Berringer re: allocations of CVA claims to insurance companies.	0.40
09/10/21	T.P. Law	Send email to Russ Roten re: allegations of "relationship" between Judge Welsh and Reed Smith.	0.40
09/10/21	T.P. Law	Telephone conference with Jones Day and Committee re: mediator candidates.	0.60
09/10/21	J.C. Schad	Research (2.0), analyze (2.0), notate (0.3) and record (.2) data and information re documents and records from the Diocese archives; consult with TLaw, JBerringer, NSooy re confirmatory review (0.3).	4.80
09/10/21	J.B. Berringer	Follow up call re mediators (.60); call re Diocese allocations (.50); review new motion to withdraw the reference (.40); review of new complaints,	5.50



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Date	Timekeeper	Description	Hours
		including BSA complaint (.90); review emails from W. Chapin re Mercy First (.80); arrangements for call with Chapin re same (.40); review emails re Arrowood, cross-over claims (.60); review draft letter to Judge Cronan (.80); review emails to R. Roten re Diane Welsh as mediator(.50).	
09/13/21	E. Y. Kim	Revise opposition brief to LMI's motion to access all proofs of claim.	3.80
09/13/21	T.P. Law	Draft, revise, and finalize joint scheduling letter to Judge Cronan in LMI adversary proceeding.	5.00
09/13/21	C.A. Lynch	Review Allianz Motion to withdraw the reference.	0.70
09/13/21	J.C. Schad	Research, analyze and prepare trigger-insurer cross reference guide (0.6), analyze suit records re triggered insurers and request source file for input (0.4).	1.00
09/13/21	C.M. LauKamg	Finalize, electronically file and serve USDC SDNY Joint Letter to Judge Cronan regarding the September 7, 2021 Order and update master files.	1.20
09/13/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.30
09/13/21	J.B. Berringer	Attendance on telephonic hearing before Judge Chapman (.70); t/c client re claims issues (.60); review of draft letter to Judge Cronan (.90); t/cs T. Law re same (.70); review new LMI letters, emails to E. Sorenson, W. Chapin re same (1.30); review A. Butler, T. Law emails re LMI motion (.50); review Moriarty, Stephens emails re portal issues (.40); review final draft of letter to Judge Cronan, t/c T. Law re same (.50).	5.60
09/14/21	E. Y. Kim	Revise opposition brief to LMI's motion to access all proofs of claim.	2.40
09/14/21	T.P. Law	Review and revise opposition to LMI's motion in Bankruptcy Court for access to POC post-dating its policy period.	4.50



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Date	Timekeeper	Description	Hours
09/14/21	T.P. Law	Draft with production of proofs of claim to the insurance companies.	0.50
09/14/21	J.B. Berringer	Review Soave personnel files (2.50); review LMI coverage letters (1.6); emails E. Sorenson, W. Chapin re same (.80)); review of Opposition to LMI motion for access to all POC's, email comments to T. Law re same (.90); review Moriarty letter re Portal (.20); email E. Stephens re same (.20); review J. Schad, A. Butler emails re claims allocation (.30); emails A. Butler re same (.30).	6.80
09/14/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.30
09/14/21	J.C. Schad	Research, comparative analysis and prepare report re triggered insurers for CVA claims.	1.50
09/15/21	A. Kramer	Biweekly call with Jones Day and RS teams re update on insurance and mediation issues	0.20
09/15/21	C.A. Lynch	Review and comment on LMI's motion for an order providing access to POCs.	1.70
09/15/21	T.P. Law	Provide suggested edits to Jones Day letter re: mediator candidates.	0.50
09/15/21	T.P. Law	Revise and circulate opposition to LMI's motion to access proofs of claim that trigger coverage after their policy periods.	3.50
09/15/21	T.P. Law	Telephone conference with legal and expert teams re: status and strategy in bankruptcy and adversary proceedings.	0.50
09/15/21	C.M. LauKamg	Finalize USBC SDNY Opposition to London Market Insurers' Motion to Access all the Sexual Abuse Proof of Claim Forms (ECF 672) and the Joinder Motion of the Allianz Defendants (ECF 703) in preparation for electronic filing.	2.00
09/15/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY	0.60



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Date	Timekeeper	Description	Hours
		docket for pleadings and update master files and calendar.	
09/15/21	J.C. Schad	Review (.30); notate (.30) and record (.10) Soave documents pursuant to request from J. Berringer.	0.70
09/15/21	J.B. Berringer	Prep. for (.60), attendance on team conference call (.20); review of draft letter to Judge Chapman re mediators (.30), email A. Butler re same (.20); review of new LMI coverage position letters, emails E. Sorensen, W. Chapin re same (.60); review of email from J. Schad re upper layer excess, reply to Schad re same (.40); review of revisions to Opposition brief (.60), emails re same (.30).	4.00
09/16/21	E. Y. Kim	Revise and finalize opposition brief to LMI's motion to access all proofs of claim.	0.60
09/16/21	C.A. Lynch	Emails T. Law regarding removal documents.	0.30
09/16/21	T.P. Law	Revise and finalize response to LMI's motion to access proofs of claim.	3.00
09/16/21	T.P. Law	Address insurance claim allocations with paralegals to insure correct insurance companies have access to the correct claims.	1.00
09/16/21	C.A. Lynch	Review penultimate draft of opposition prior to filing.	0.50
09/16/21	C.A. Lynch	Review and further revisions to opposition to LMI's motion for access to all POCs (and Allianz's joinder thereto).	0.30
09/16/21	C.M. LauKamg	Double check Claims Allocation Contact Information and circulate findings to Team.	0.50
09/16/21	C.M. LauKamg	Finalize USBC SDNY Opposition to London Market Insurers' Motion to Access all the Sexual Abuse Proof of Claim Forms (ECF 672) and the Joinder Motion of the Allianz Defendants (ECF 703) in preparation for electronic filing.	1.20
09/16/21	C.M. LauKamg	Finalize USBC SDNY Opposition to London Market Insurers' Motion to Access all the Sexual	3.00



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Date	Timekeeper	Description	Hours
		Abuse Proof of Claim Forms (ECF 672) and the Joinder Motion of the Allianz Defendants (ECF 703) in preparation for electronic filing (1.0); electronically file and serve same (1.0); prepare, review and electronically file Certificate of Service regarding same (.8); prepare email and package to USBC SDNY Judge Chapman and send same to Chambers (.2).	
09/16/21	J.C. Schad	Research, confirmatory analysis, notate and record triggered claims for historic insurers for report to TLaw.	0.50
09/16/21	J.B. Berringer	Review comments, final draft of Opposition brief (.90); review emails re Portal access on insurers to POCs , emails team re same (1.10); review C. Ball email re mediators (.50); email to team re Soave documents (.80); review emails re Claims allocations (.50); review J. Lynch email re Ecclesia ROR letters, begin drafting new letter (.60).	4.40
09/17/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.30
09/17/21	J.C. Schad	Research (0.20), identify (0.3), notate (0.3) and record (0.20) documents received from Diocesan archives.	1.00
09/17/21	J.B. Berringer	Review Cronan decision re Interstate 9.60), emails re T. Law, A. Kramer, C. Lynch re same (.20); email team re Cronan decision (.10); review W. Chapin re CHS, emails Chapin, T. Lawcre same (.40); review of CHS RoR letters (.60); email W. Chapin re automatic stay (.10); prep. for initial Pre-trial conference with Judge Cronan (.80); t/c T. Law re same (.30); review CVA Merits docs re Fr. Huneke (2.90).	6.00
09/18/21	J.B. Berringer	Further revie of Huneke CVA Merits docs.	2.10
09/20/21	T.P. Law	Begin mediation issue briefs to prepare for Bankruptcy Court mediation,.	0.60



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Date	Timekeeper	Description	Hours
09/20/21	T.P. Law	Review and approve letter to Tom Renker from John Berringer re: reservations of rights.	0.20
09/20/21	T.P. Law	Participate in lengthy mediation preparation session with Reed Smith and Jones Day lawyers.	2.00
09/20/21	T.P. Law	Participate in scheduling conference with court re: LMI case.	0.70
09/20/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.60
09/20/21	J.B. Berringer	Prep for, attendance at PTC with Judge Cronan (1.20); t/c T. Law following PTC (.30); complete review of Huneke documents (2.50); exchange emails w/ A. Butler re Soave documents (.30); t/c team re mediation prep. (.90); t/c T. Law re mediation prep (.30); review W. Chapin email, CNA coverage letters (.30); emails with J. Moffitt re CVA Merits documents (.30)	6.10
09/20/21	C.A. Lynch	Emails C. Laukamg regarding appearance at hearing on POCs.	0.10
09/20/21	C.A. Lynch	Review Evanston's request to reconsider joinder to LMI withdrawal.	0.40
09/20/21	A. Kramer	Conference call of Jones Day and Reed Smith teams re mediation preparation	2.00
09/20/21	C.M. LauKamg	Arrange J. Berringer September 23, 2021 telephonic hearing appearance and circulate confirmation of same.	0.20
09/20/21	J.C. Schad	Research, analyze, notate and record documents recovered from Diocesan archives.	3.50
09/21/21	N. Sooy	Communications with Clerk of Court for NJ and PA requesting certificate of good standing for T. Law for pro hac vice admission in SDNY.	0.60
09/21/21	T.P. Law	Identify topics and begin drafting mediation issue briefs.	4.50
09/21/21	J.C. Schad	Research report to TLaw re status of legacy	5.00



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Date	Timekeeper	Description	Hours
		subscribing insurer (2.5); comparative analysis re claims triggering policies issued by Arrowood predecessors (0.6); research report to JBerringer re legacy subscribing insurer (0.6); retrieve, review for report to JBerringer re Diocese stored records (0.3); research, notate and record documents from Diocese stored records (1.0).	
09/21/21	J.B. Berringer	T/c M. Burnett re valuation issues (.80); review of Soave documents (2.10); review of Schad email re CNA (.40) review emails re Ancon Insurance (.80); review email from Kennedy's, Court Order re withdrawal motions (.80); review of Scheduling Order (.40); arrangements for download of CVA Merits documents (.90); review of memo by A & M re BSA matrix, email Burnett re same (.70).	6.90
09/21/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.80
09/21/21	L. E. Simmonds	Draft form for Mediation Issue Brief.	0.40
09/22/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings in preparation for the September 23, 2021 Hearing and circulate same to Attorneys.	0.80
09/22/21	J.B. Berringer	Review Huneke documents and draft memo re same (2.50); review new LMI coverage position letters, emails E. Sorenson , W. Chapin re same (1.60); t/c E. Sorenson re same (.20); prep for hearing re POC access, including review of briefs and caselaw (1.80); emails with Jones Day team, T. Law re same (.60); t/c Committee re same (.30)	7.00
09/22/21	J.C. Schad	Research, analyze, notate and record documents received from Diocese stored records.	1.50
09/22/21	C.M. LauKamg	Arrange T. Law September 23, 2021 Telephonic Hearing Appearance and circulate confirmation of same.	0.20



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Date	Timekeeper	Description	Hours
09/23/21	T.P. Law	Telephone conference with Judge Chapman re: oral argument on motion for access to proofs of claim.	0.80
09/23/21	T.P. Law	Email exchange re: Arrowood access to Proof of Claim.	0.20
09/23/21	J.B. Berringer	Draft outline for hearing (.90); attendance at telephone hearing on Access to POC motion (.80); complete first draft of Huneke memo (.80); review Soave docs, begin drafting Soave memo (1.50); review LMI proposed Order on motion re POC access (.60); emails team re same (.50); review emails re BSA Plan (.30); review Moriarty email re POCs, T. Law response (.40); review J. Lynch email re Ecclesia RoR letter, reply to same (.40).	6.20
09/23/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.60
09/24/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.60
09/24/21	C.M. LauKamg	Finalize USDC SDNY J. Berringer and C. Lynch Notices of Appearance and Letter Motion Requesting Extension of Time to Respond to the Motion to Withdraw the Reference in preparation for electronic filing.	2.00
09/24/21	J.B. Berringer	Review draft Order revisions (.40); t/c T. Law re proposed Order (.30); revisions to Huneke memo (.60); review spreadsheets re Soave abuse claims (.90); email K. Tran re Soave spreadsheets (.40); review Kramer emails re Plan options (.60); emails C. Lynch re Hellerstein motion (.60); draft memo re Soave (1.80); review emails re adjournment of Hellerstein motion, email C. Jones re same (.80).	6.40
09/24/21	T.P. Law	Draft edits for form or order on motion for access	0.50



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Date	Timekeeper	Description	Hours
		to POC and circulate.	
09/24/21	T.P. Law	Draft and revise first issue brief re: full costs of duty to defend.	2.50
09/24/21	T.P. Law	Instruct Jess Kraus with regard to issue briefs.	0.50
09/24/21	J.C. Schad	Research re corporate structure, ownership history and prior responses from insurer members of the Zurich group for report to JBerringer re response to insurer communication.	0.50
09/24/21	C.A. Lynch	Review Judge Hellerstein individual rules, scheduling matters.	0.60
09/24/21	J. E. Kraus	Intro to project; reviewed brief	0.40
09/24/21	C.A. Lynch	Emails Allianz counsel and J.Berringer/T. Law regarding extension to file opposition to motion to withdrawal.	0.20
09/24/21	C.A. Lynch	Calls with Allianz Defendants' counsel regarding briefing schedule.	0.30
09/24/21	C.A. Lynch	Revise letter to Judge Hellerstein.	0.50
09/27/21	C.A. Lynch	Review Judge Hellerstein appearance rules (.10); review and comment on notices (.20).	0.30
09/27/21	C.A. Lynch	Email Committee insurance counsel regarding Allianz defendants' withdrawal motion.	0.20
09/27/21	C.A. Lynch	Review and revise letter to court regarding extension to oppose withdrawal motion.	0.60
09/27/21	C.A. Lynch	Review defendants' letter motions to consolidate with LMI case.	1.20
09/27/21	J.B. Berringer	Review and revise Soave, Huneke memos (1.80); emails to K. Tran, W. Chapin re claim spreadsheets (.80); review of new docs, spreadsheets re Huneke, Soave claims (1.40); review of emails re adjournment of motion in Judge Hellerstein's court (.80); review draft letter to Judge Hellerstein, email T. Law re same (.40).	5.20
09/27/21	C.M. LauKamg	Finalize and electronically file USDC SDNY J. Berringer Notice of Appearance and Letter Motion	0.80



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Date	Timekeeper	Description	Hours
		Requesting Extension of Time to Respond to the Motion to Withdraw the Reference and update master files.	
09/27/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.80
09/28/21	T.P. Law	Emails to ensure insurance company access to proofs of claim.	0.30
09/28/21	J. E. Kraus	Research and review of issue brief	1.40
09/28/21	C.A. Lynch	Review memorandum order regarding extension and email parties.	0.10
09/28/21	C.M. LauKamg	Finalize USDC SDNY C. Lynch Notice of Appearance in preparation for electronic filing.	0.20
09/28/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	1.00
09/28/21	J.C. Schad	Research and prepare response to insurer representative (0.8); research and prepare report to JBerringer re policy evidence (0.7).	1.50
09/28/21	J.B. Berringer	Final revisions to Huneke, Soave memos (1.60); emails team re same (.20); review emails re anti-assignment issue, BSA Plan (.40); email to team re same (.20); review of spreadsheet re POC access, email A. Butler re same (.50); email to T. Law re joinder issue (.30); review W. Chapin email re DOE issue (.20); email counsel re same (.20) re email re Farmers Ins, email J. Schad re same (.40); review email re MercyFirst (.20).	4.20
09/29/21	J.B. Berringer	Prep. for, attendance on call with team (1.40); revisions to letter to court, review of emails re same(2.50); t/cs C. Lynch, T. Law re Joinder Letter Motions , letter to Court (.80); review article re BSA plan (.50); review email re Farmers" Ins., email J. Schad re same (.40).	5.60



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Date	Timekeeper	Description	Hours
09/29/21	T.P. Law	Telephone conferences and emails with Chris Lynch and John Berringer re: draft letter to Judge Cronan re: withdrawal of reference and consolidation.	0.90
09/29/21	T.P. Law	Participate in work in progress with legal and expert team.	0.80
09/29/21	A. Kramer	Bi-weekly catch-up call with Jones Day, RS, client and A&M teams re insurance cases, upcoming omnibus	0.70
09/29/21	C.A. Lynch	Call with J. Berringer regarding Allianz relatedness request, briefing before Judge Hellerstein.	0.30
09/29/21	C.A. Lynch	Review status of Lexington withdrawal motion joinder.	0.30
09/29/21	J.C. Schad	Research, respond re insurer communications.	0.30
09/29/21	C.A. Lynch	Call with T. Law regarding letter to Judge Cronin.	0.30
09/29/21	C.A. Lynch	Review and revise letter to Judge Cronin regarding response to joinder motions.	1.60
09/30/21	T.P. Law	Email exchange re: whether letter to Judge Cronan is necessary.	0.30
09/30/21	J.C. Schad	Discussion with insurer representative (0.2); research, analyze and prepare materials in support of response to insurer representative (0.9); research report to JBerringer re historic insurer (0.2).	1.30
09/30/21	C.M. LauKamg	Retrieve USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings and update master files and calendar.	0.60
09/30/21	J. E. Kraus	Researched and revised issue brief #1	3.40
09/30/21	J.B. Berringer	Review emails re Joinder motions from T. Law, C. Lynch (.60); email team re same (.30); review Schad emails re Farmer's Ins., Colonial Penn (.60) ; review new LMI coverage position letters, emails E. Sorenson, W. Chapin re same (.90);	6.90



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Date	Timekeeper	Description	Hours
		review of Priest personnel files (4.50).	
09/30/21	C.A. Lynch	Emails J. Berringer and T. Law regarding letter to Judge Cronin.	0.40
Total Hours			255.60

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	4.20 hrs @ \$	1,225.00 / hr	5,145.00
John B. Berringer	113.70 hrs @ \$	1,130.00 / hr	128,481.00
Timothy P. Law	50.20 hrs @ \$	995.00 / hr	49,949.00
Christopher A. Lynch	12.70 hrs @ \$	880.00 / hr	11,176.00
Esther Y. Kim	21.30 hrs @ \$	535.00 / hr	11,395.50
James C. Schad	26.10 hrs @ \$	530.00 / hr	13,833.00
Jessica E. Kraus	5.20 hrs @ \$	495.00 / hr	2,574.00
Nora Sooy	0.60 hrs @ \$	380.00 / hr	228.00
Christopher LauKamg	21.20 hrs @ \$	350.00 / hr	7,420.00
Lianna E. Simmonds	0.40 hrs @ \$	290.00 / hr	116.00
Total Professional Services			230,317.50

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
	Duplicating/Printing/Scanning	12.00 @ 0.10 1.20
	Postage Expense	3.12



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Date	Description	Amount
08/09/2021	CHRISTOPHER LYNCH - Court - Other - VENDOR: Christopher Lynch, Aug 09, 2021, ?USBC SDNY J. Berringer and T. Law August 9, 2021 Telephonic Mediation Status Conference Appearance Fee?. Client matter # 504893.60005.	70.00
08/09/2021	CHRISTOPHER LYNCH - Court - Other - VENDOR: Christopher Lynch, Aug 09, 2021, ?USBC SDNY J. Berringer and T. Law August 9, 2021 Telephonic Mediation Status Conference Appearance Fee?. Client matter # 504893.60005.	70.00
08/19/2021	CHRISTOPHER LYNCH - Court - Other - VENDOR: Christopher Lynch, Aug 19, 2021, ?USBC SDNY J. Berringer August 19, 2021 Telephonic Hearing Appearance Fee?. Client matter # 504893.60005.	70.00
08/23/2021	CHRISTOPHER LYNCH - Court - Other - VENDOR: Christopher Lynch, Aug 23, 2021, ?USBC SDNY J. Berringer and T. Law August 23, 2021 Telephonic Hearing Appearance Fee?. Client matter # 504893.60005.	70.00
08/23/2021	CHRISTOPHER LYNCH - Court - Other - VENDOR: Christopher Lynch, Aug 23, 2021, ?USBC SDNY J. Berringer and T. Law August 23, 2021 Telephonic Hearing Appearance Fee?. Client matter # 504893.60005.	70.00
09/10/2021	LEVEL 3 COMMUNICATIONS, LLC - Global Crossing Inv No: 243294309_13 - SOOY,BNORA	0.46
09/21/2021	United Parcel Service - 00843 UPS - Shipped from Nora Sooy Reed Smith LLP - Philadelph to Certificate of Good Pennsylvania Supreme Court (PITTSBURGH PA 15219) Timothy P. Law 1Z7332X6NT95973289	13.05
09/21/2021	United Parcel Service - 00843 UPS - Shipped from Nora Sooy Reed Smith LLP - Philadelph to Certificate of Good NJ Board of Bar Examiners (NEWARK NJ 07102) Timothy P. Law 1Z7332X60197472893	13.05
09/21/2021	United Parcel Service - 00843 UPS - Shipped from Nora Sooy Reed Smith LLP - Philadelph to Certificate of Good NJ Board of Bar Examiners (NEWARK NJ 07102) Timothy P. Law 1Z7332X60197472893	5.45
09/21/2021	SUPREME COURT OF PENNSYLVANIA - CERTIFIED COPIES PA Certificate of Good Standing for Tim Law pro hac vice application in SDNY	25.00



Reed Smith LLP
Three Logan Square
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1717 Arch Street
Philadelphia, PA 19103
Telephone: +1 215 851 8100
Fax: +1 215 851 1420
Tax ID # 25-0749630

ABU DHABI ♦ ATHENS ♦ AUSTIN ♦ BEIJING ♦ BRUSSELS ♦ CENTURY CITY ♦ CHICAGO ♦ DALLAS ♦ DUBAI ♦ FRANKFURT ♦ HONG KONG ♦ HOUSTON ♦ KAZAKHSTAN ♦ LONDON ♦ LOS ANGELES ♦ MIAMI
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Date	Description	Amount
09/21/2021	SECRETARY, NEW JERSEY BOARD OF - CERTIFIED COPIES Certificate of Good Standing from NJ for SDNY pro hac vice application	20.00
09/23/2021	JOHN BERRINGER - Court - Other - VENDOR: John Berringer, Sep 23, 2021, Case Name: The Roman Catholic Diocese of Rockville Centre, New York. Case Number: 20-12345 Judge: Shelley Chapman Date and Time of Hearing: 9/23/2021 10:00 AM EST	70.00
Total Expenses and Other Charges		501.33

INVOICE SUMMARY

Total Fees	\$ 230,317.50
Total Expenses and Other Charges	\$ 501.33
TOTAL CURRENT INVOICE DUE	\$ 230,818.83
Total Amount Due	\$ 230,818.83



Reed Smith LLP
599 Lexington Avenue
22nd Floor
New York, NY 10022
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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3440793**
Invoice Date: **10/12/2021**
Client Number: **504893**
Matter Number: **504893.60006**

REMITTANCE PAGE

PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Fee statements/fee applications

Total Current Fees.....\$ 1,576.00

Total Due This Invoice: \$ 1,576.00

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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RE: Fee statements/fee applications

INVOICE SUMMARY

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Mail To:
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PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH September 30, 2021

Date	Timekeeper	Description	Hours
09/09/21	C.M. LauKamg	USBC SDNY Reed Smith LLP Eleventh Monthly Fee Statement.	0.80
09/17/21	C.M. LauKamg	Finalize and electronically file USBC SDNY Reed Smith LLP Eleventh Monthly Fee Statement and update master files and calendar.	1.60
09/17/21	C.M. LauKamg	Finalize USBC SDNY Reed Smith LLP Eleventh Monthly Fee Statement in preparation for electronic filing.	1.20
09/17/21	C.A. Lynch	Review and comment on monthly fee statement.	0.20
09/20/21	C.M. LauKamg	Finalize and electronically file USBC SDNY Amended Certificate of Service Regarding Reed Smith LLP Eleventh Monthly Fee Statement and update master files and calendar.	0.40
Total Hours			4.20

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Christopher A. Lynch	0.20 hrs @ \$	880.00 / hr	176.00
Christopher LauKamg	4.00 hrs @ \$	350.00 / hr	1,400.00
Total Professional Services			1,576.00

INVOICE SUMMARY

Total Fees \$ 1,576.00



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TOTAL CURRENT INVOICE DUE

\$ 1,576.00

Total Amount Due

\$ 1,576.00