

**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)

**MONTHLY FEE STATEMENT OF WALLER LANSDEN DORTCH & DAVIS, LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE DEBTOR
FOR THE PERIOD OF AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

| | |
|---|--|
| Name of Applicant | Waller Lansden Dortch & Davis, LLP |
| Authorized to provide professional services to | Debtor and Debtor-in-Possession |
| Effective Date of Retention | April 15, 2020, <i>nunc pro tunc</i> to February 19, 2020 (the " <i>Petition Date</i> ") |
| Period for which compensation and reimbursement are sought | August 1, 2022 through August 31, 2022 (the " <i>Compensation Period</i> ") |
| Amount of Compensation sought as actual, reasonable and necessary | \$22,587.00 |
| Amount of Expense Reimbursement sought as actual, reasonable and necessary | \$2,769.18 |
| Total Amount Sought | \$25,356.18 |
| Total Amount of Compensation (at 80%) and Expenses (at 100%) authorized to be paid per monthly fee applications | \$18,069.60 |
| Blended Rate for all Attorneys | \$406.82 |
| Blended Rate for all Timekeepers | \$403.34 |

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* (Dkt. No. 121) (the “**Interim Compensation Order**”), the law firm of Waller Lansden Dortch & Davis, LLP (“**Waller**”), counsel 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 **\$18,069.60** for the reasonable and necessary legal services Waller rendered to the Debtor during the Compensation Period (80% of **\$22,587.00**) and (b) reimbursement for 100% of the actual and necessary expenses that Waller incurred, in the amount of **\$2,769.18** during the Compensation Period.

Services Rendered and Disbursements Incurred

2. Attached as **Exhibit A** is a billing summary of Waller 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 Waller 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 Waller’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 Waller 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, Waller 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, Waller, in connection with services rendered on behalf of the Debtor, respectfully requests (a) allowance of compensation and reimbursement in the amount of (i) **\$18,069.60** for reasonable and necessary professional services rendered (80% of **\$22,587.00**) and (ii) **\$2,769.18** for 100% of actual and necessary costs and expenses incurred during the Compensation Period, for a total of **\$20,838.78**, and (b) payment of the forgoing sums.

Dated: September 21, 2022
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*)
511 Union Street, Suite 2700
Nashville, TN 37219
Telephone: (615) 244-6380
Facsimile: (615) 244-6804
Email: blake.roth@wallerlaw.com
tyler.layne@wallerlaw.com

-and-

KLEINBARD, LLC

Matthew H. Haverstick (State Bar No. 85072)
Joshua J. Voss (State Bar No. 306853)
Three Logan Square
1717 Arch Street, 5th Floor
Philadelphia, Pennsylvania 19103
Telephone: (215) 568-2000
Facsimile: (215) 568-0140
Email: mhaverstick@kleinbard.com
jvoss@kleinbard.com

Attorneys for the Debtor and Debtor In Possession

EXHIBIT A

COMPENSATION BY PROFESSIONAL

| Name | Position/Bar Year/Start Year | Effective Billing Rate | Bill Hours | Billed Amount |
|--------------------|-------------------------------------|-------------------------------|-------------------|----------------------|
| Mace, Gerald | Partner/1985/2000 | — | — | — |
| Hills, Richard | Partner/1996/2014 | — | — | — |
| Gaston, Jon | Partner/2004/2006 | — | — | — |
| Layne, Tyler | Partner/2012/2014 | \$465 | 0.1 | \$46.50 |
| Bell, Mark | Partner/2010/2010 | — | — | — |
| Roth, Blake | Partner/2009/2012 | \$412.38 | 51.8 | 21,361.50 |
| Flinn, Aaron | Partner/2004/2010 | — | — | — |
| Yopp, Michael | Partner/1975/2000 | — | — | — |
| Bunge, John | Partner/2013/2016 | — | — | — |
| Ray, Eric | Partner/1998/2020 | — | — | — |
| Weiss, Morris | Partner/1985/2016 | — | — | — |
| Peebles, Thomas | Of Counsel/1986/1989 | — | — | — |
| Timblin, Dustin | Of Counsel/2012/2012 | — | — | — |
| Atkinson, Evan | Associate/2017/2018 | — | — | — |
| Henninger, Samuel | Associate/2019/2020 | — | — | — |
| Thornton, Hunter | Associate/2019/2019 | — | — | — |
| Stansell, Clayton | Associate/2019/2021 | — | — | — |
| Sands, Lee | Associate/2020/2020 | — | — | — |
| Berny, Hannah | Associate/2021/2021 | — | — | — |
| Lewis, Kendria | Associate/2021/2021 | \$315 | 3.2 | \$1,008.00 |
| Cronk, Chris | Paralegal/NA/2000 | — | — | — |
| Freeman, Brooke | Paralegal/NA/2020 | — | — | — |
| Jezisek, Ann Marie | Paralegal/NA/2016 | \$190 | 0.9 | \$171.00 |
| Ramer, Jeanette L. | Paralegal/NA/1993 | — | — | — |
| Hawks, Angela | Practice Support Specialist/NA/2000 | — | — | — |
| | | Totals | 56.0 | \$22,587.00 |

4893-3792-9524.1

EXHIBIT B

COMPENSATION BY PROJECT CATEGORY

| | | Hours | Amount |
|-------------|--|--------------|--------------------|
| B100 | Administration | — | — |
| B110 | Case Administration | 3.6 | \$1,168.00 |
| B120 | Asset Analysis and Recovery | 0.1 | \$47.00 |
| B130 | Asset Disposition | — | — |
| B140 | Relief from Stay/Adequate Projection Proceedings | — | — |
| B150 | Meetings of and Communications with Creditors | — | — |
| B160 | Fee/Employment Applications | 2.3 | \$997.00 |
| B170 | Fee/Employment Objections | — | — |
| B180 | Avoidance Action Analysis | — | — |
| B185 | Assumption/Rejection of Leases and Contracts | — | — |
| B190 | Other Contested Matters | 17.4 | \$8,178.00 |
| B195 | Non-Working Travel | 12.7 | \$2,984.50 |
| | | | |
| B200 | Operations | — | — |
| B210 | Business Operations | — | — |
| B220 | Employee Benefits/Pensions | — | — |
| B230 | Financing/Cash Collections | — | — |
| B240 | Tax Issues | — | — |
| B250 | Real Estate | — | — |
| B260 | Board of Directors Matters | — | — |
| | | | |
| B300 | Claims and Plan | — | — |
| B310 | Claims Administration and Objections | 0.1 | \$47.00 |
| B320 | Plan and Disclosure Statement | 19.8 | \$9,165.50 |
| | | | |
| B400 | Bankruptcy-Related Advice | — | — |
| B410 | General Bankruptcy Advice/Opinions | — | — |
| B420 | Restructurings | — | — |
| | Total | 56 | \$22,587.00 |

EXHIBIT C

EXPENSE SUMMARY

| Expense Category | Amount |
|-------------------------|-------------------|
| Conference Calls | — |
| Online Research | — |
| Postage | — |
| Travel | \$2,769.18 |
| Transcripts | — |
| Total | \$2,769.18 |

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EXHIBIT D

TIME DETAIL

4893-3792-9524.1

WALLER LANSDEN DORTCH & DAVIS, LLP
NASHVILLE CITY CENTER
511 UNION STREET, SUITE 2700
POST OFFICE BOX 198966
NASHVILLE, TENNESSEE 37219-8966
615-244-6380
FEDERAL ID NO. 62-0479474

Donald J. Kaercher, CPA
CFO - Diocese of Harrisburg
Via Email:
dkaercher@hbgdiocese.org

September 14, 2022
Invoice 10873851
Page 1
Bill Through 08/31/22
Billing Atty: B. Roth

Our Matter # 036905.08024

Chapter 11 Restructuring

Fees:

B110 Case Administration

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|--|--------------------|--------------|-----------------|
| 08/08/22 | Review order staying deadlines and abating hearings on disclosure statements and claim objections, and update case calendar re: same | Jezisek, Ann Marie | 0.10 | 19.00 |
| 08/08/22 | Attention to questions and answers re: [REDACTED] | Roth, Blake D | 0.20 | 94.00 |
| 08/09/22 | Communicate with C. Linscott re: [REDACTED] | Roth, Blake D | 0.10 | 47.00 |
| 08/11/22 | Research [REDACTED] | Lewis, Kendria S | 1.80 | 567.00 |
| 08/21/22 | Research/review [REDACTED] | Lewis, Kendria S | 1.40 | 441.00 |
| | | Total | 3.60 | 1,168.00 |

B120 Asset Analysis and Recovery

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|--|-------------------|--------------|---------------|
| 08/10/22 | Communicate with K. Lewis re: [REDACTED] | Roth, Blake D | 0.10 | 47.00 |
| | | Total | 0.10 | 47.00 |

B160 Fee/Employment Applications

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|---|--------------------|--------------|---------------|
| 08/15/22 | Attention to monthly fee statements | Roth, Blake D | 0.30 | 141.00 |
| 08/16/22 | Draft Kleinbard's monthly fee statement | Roth, Blake D | 0.30 | 141.00 |
| 08/16/22 | Draft Waller's monthly fee statement | Roth, Blake D | 0.30 | 141.00 |
| 08/16/22 | Draft Keegan Lincsoctt's monthly fee statement | Roth, Blake D | 0.30 | 141.00 |
| 08/16/22 | Communicate with A.M. Jesizak re: [REDACTED] | Roth, Blake D | 0.10 | 47.00 |
| 08/18/22 | Attention to interim compensation matters and communicate with Committee counsel re: same | Roth, Blake D | 0.30 | 141.00 |
| 08/22/22 | Finalize and file monthly fee statements for Debtor's professionals | Jezisek, Ann Marie | 0.30 | 57.00 |
| 08/22/22 | Attention to interim compensation applications | Roth, Blake D | 0.40 | 188.00 |
| | Total | | 2.30 | 997.00 |

B190 Other Contested Matters

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|--|-------------------|--------------|-----------------|
| 08/01/22 | Calls with D. Kaercher and J. Voss re: [REDACTED] | Roth, Blake D | 0.90 | 423.00 |
| 08/02/22 | Attend meeting with the Committee in Harrisburg | Roth, Blake D | 9.30 | 4,371.00 |
| 08/04/22 | Multiple communications re: resolution with Committee and attention to issues re: same | Roth, Blake D | 3.30 | 1,551.00 |
| 08/05/22 | Work on mediation and insurance issues | Roth, Blake D | 2.10 | 987.00 |
| 08/08/22 | Multiple calls with carriers' counsel re: insurance and mediation issues | Roth, Blake D | 0.70 | 329.00 |
| 08/09/22 | Work on issues related to mediation and settlement with Committee | Roth, Blake D | 0.90 | 423.00 |
| 08/17/22 | Attention to insurance and mediation issues | Roth, Blake D | 0.10 | 47.00 |
| 08/18/22 | Attention to insurance and mediation issues | Roth, Blake D | 0.10 | 47.00 |
| | Total | | 17.40 | 8,178.00 |

B195 Non-Working Travel

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|---|-------------------|--------------|-----------------|
| 08/01/22 | Travel to Harrisburg for August 2 meeting with Committee (billed at 50% rate) | Roth, Blake D | 6.00 | 1,410.00 |
| 08/03/22 | Travel from Harrisburg to Nashville (billed at 50% rate) | Roth, Blake D | 6.70 | 1,574.50 |
| | Total | | 12.70 | 2,984.50 |

B310 Claims Administration and Objections

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|--|-------------------|--------------|---------------|
| 08/12/22 | Communicate with R. Monico re: claims issues | Roth, Blake D | 0.10 | 47.00 |
| | Total | | 0.10 | 47.00 |

B320 Plan and Disclosure Statement

| <u>Date</u> | <u>Description</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> |
|---|--|--------------------|--------------|------------------|
| 08/05/22 | Review and revise motion to stay deadlines and abate August 11 hearing re: disclosure statements and survivor claim objections | Jezisek, Ann Marie | 0.10 | 19.00 |
| 08/05/22 | Emails with B. Roth re: [REDACTED] [REDACTED] | Jezisek, Ann Marie | 0.10 | 19.00 |
| 08/05/22 | Finalize and file motion to stay deadlines and abate hearing | Jezisek, Ann Marie | 0.10 | 19.00 |
| 08/05/22 | Emails with court staff re: filing event for motion to stay deadlines and abate hearing | Jezisek, Ann Marie | 0.10 | 19.00 |
| 08/05/22 | Email to Epiq re: service of motion to stay deadlines and abate hearing | Jezisek, Ann Marie | 0.10 | 19.00 |
| 08/05/22 | Review motion to stay plan deadlines | Layne, Tyler N | 0.10 | 46.50 |
| 08/05/22 | Review and revise plan and disclosure statement | Roth, Blake D | 0.90 | 423.00 |
| 08/08/22 | Work on plan and disclosure statement | Roth, Blake D | 1.10 | 517.00 |
| 08/09/22 | Work on plan and disclosure statement and issues relating to same | Roth, Blake D | 1.80 | 846.00 |
| 08/10/22 | Call with J. Voss re: [REDACTED] | Roth, Blake D | 0.30 | 141.00 |
| 08/11/22 | Review and revise plan and disclosure statement | Roth, Blake D | 1.10 | 517.00 |
| 08/12/22 | Review and revise plan, disclosure statement, and related documents | Roth, Blake D | 1.70 | 799.00 |
| 08/15/22 | Review and revise plan, disclosure statement and related documents | Roth, Blake D | 2.10 | 987.00 |
| 08/16/22 | Work on plan issue | Roth, Blake D | 1.20 | 564.00 |
| 08/18/22 | Call with Committee counsel re: plan and related matters | Roth, Blake D | 0.20 | 94.00 |
| 08/18/22 | Call with C. Linscott re: [REDACTED] [REDACTED] | Roth, Blake D | 0.70 | 329.00 |
| 08/18/22 | Attention to plan and disclosure statement issues | Roth, Blake D | 0.60 | 282.00 |
| 08/19/22 | Work on plan and disclosure statement and communicate with J. Voss re: [REDACTED] | Roth, Blake D | 2.70 | 1,269.00 |
| 08/23/22 | Call with carriers re: plan issues | Roth, Blake D | 0.40 | 188.00 |
| 08/23/22 | Call with J. Voss and Fr. Forrey re: [REDACTED] [REDACTED] | Roth, Blake D | 1.00 | 470.00 |
| 08/25/22 | Attention to various plan and disclosure statement issues | Roth, Blake D | 1.40 | 658.00 |
| 08/26/22 | Communicate with Committee counsel and carirer counsel re: plan and disclosure statement | Roth, Blake D | 0.30 | 141.00 |
| 08/31/22 | Work on plan and disclosure statement | Roth, Blake D | 1.70 | 799.00 |
| Total | | | 19.80 | 9,165.50 |
| Total Fees for Professional Services | | | 56.00 | 22,587.00 |

Time Summary

| <u>Timekeeper</u> | <u>Position</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|--------------------|-----------------|--------------|-------------|---------------|
| Layne, Tyler N | Partner | 0.10 | 465.00 | 46.50 |
| Roth, Blake D | Partner | 51.80 | 412.38 | 21,361.50 |
| Lewis, Kendria S | Associate | 3.20 | 315.00 | 1,008.00 |
| Jezisek, Ann Marie | Paralegal | 0.90 | 190.00 | 171.00 |

Totals**56.00****22,587.00****Task Summary**

| Task | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|--------------------------------------|---------------------|----------------------|
| B110 | Case Administration | 3.60 | 1,168.00 |
| B120 | Asset Analysis and Recovery | 0.10 | 47.00 |
| B160 | Fee/Employment Applications | 2.30 | 997.00 |
| B190 | Other Contested Matters | 17.40 | 8,178.00 |
| B195 | Non-Working Travel | 12.70 | 2,984.50 |
| B310 | Claims Administration and Objections | 0.10 | 47.00 |
| B320 | Plan and Disclosure Statement | 19.80 | 9,165.50 |
| | Totals | 56.00 | 22,587.00 |

Disbursements:

| <u>Date</u> | <u>Description</u> | <u>Amount</u> |
|--------------------|--|----------------------|
| 07/22/22 | VENDOR: Blake Roth INVOICE#: 010053335007 DATE: 8/16/2022 Airfare re: attend mediation in Harrisburg | 545.96 |
| 08/01/22 | VENDOR: Blake Roth INVOICE#: 010053335007 DATE: 8/16/2022 Hotel parking re: attend mediation in | 24.00 |
| 08/02/22 | Harrisburg VENDOR: Blake Roth INVOICE#: 010053335007 DATE: 8/16/2022 Hotel re: attend | 24.00 |
| 08/03/22 | mediation in Harrisburg VENDOR: Blake Roth INVOICE#: 010053335007 DATE: 8/16/2022 Rental car | 439.70 |
| 08/03/22 | re: attend mediation in Harrisburg VENDOR: Blake Roth INVOICE#: 010053335007 DATE: 8/16/2022 Hotel re: | 584.96 |
| 08/05/22 | attend mediation in Harrisburg VENDOR: Blake Roth INVOICE#: 010053335007 DATE: 8/16/2022 Meeting | 1,150.56 |
| | rooms at hotel re: attend mediation in Harrisburg | |
| | Total Disbursements: | 2,769.18 |

Disbursement Summary

| | |
|----------------|----------|
| Client Charges | 2,769.18 |
|----------------|----------|

| | |
|----------------------------|-----------------|
| Total Disbursements | 2,769.18 |
|----------------------------|-----------------|

| | |
|--|--------------|
| Total Fees and Disbursements on This Invoice | \$ 25,356.18 |
|--|--------------|

| | |
|-------------------------------|--------------|
| PLEASE REMIT TOTAL AMOUNT DUE | \$ 25,356.18 |
|-------------------------------|--------------|