

**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)

**SUMMARY OF TENTH INTERIM FEE APPLICATION OF KLEINBARD, LLC,
FOR THE PERIOD OF JUNE 1, 2022 THROUGH AUGUST 31, 2022**

Name of Applicant	Kleinbard, LLC	
Applicant's role in case	Special Counsel to Debtor and Debtor-in-Possession	
Date order of employment signed	March 12, 2020, <i>nunc pro tunc</i> to February 19, 2020 (the " <i>Petition Date</i> ")	
	Beginning of Period	End of Period
Time period covered by this Application:	6/1/2022	8/31/2022
Time period(s) covered by prior Applications:	2/19/2020	5/31/2022
Total amounts awarded in all prior Applications:	\$842,960.00	
Total fees requested in this Application:	\$11,200.00	
Total professional fees requested in this Application:	\$11,200.00	
Total actual professional hours covered by this Application:	28.0	
Average hourly rate for professionals:	\$400	
Total paraprofessional fees requested in this Application:	\$0.00	
Total actual paraprofessional hours covered by this Application:	0.0	
Average hourly rate for paraprofessionals:	\$0	
Reimbursable expenses sought in this application:	\$18,540.96	
Total to be Paid to Priority Unsecured Creditors:	The amount of any creditor's ultimate recovery is unknown as of the date hereof.	
Anticipated % Dividend to Priority Unsecured Creditors:	The amount of any creditor's ultimate recovery is unknown as of the date hereof.	
Total to be Paid to General Unsecured Creditors:	The amount of any creditor's ultimate recovery is unknown as of the date hereof.	
Anticipated % Dividend to General Unsecured Creditors:	The amount of any creditor's ultimate recovery is unknown as of the date hereof.	
Date of Confirmation Hearing:	Not Applicable	
Indicate whether plan has been confirmed:	No	

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.

SUMMARY OF PRIOR MONTHLY FEE STATEMENTS

MONTHLY FEE STATEMENTS

Statement	Period Covered	Fees Requested	Expenses Requested	Total Requested	Payment Authorized ¹	Payment Withheld ²
First [Doc. 267]	02/19/2020 – 03/31/2020	\$76,882.00	\$33,669.91	\$110,551.91	\$95,175.51	\$15,376.40
Second [Doc. 311]	04/01/2020 – 04/30/2020	\$58,319.50	\$8,777.18	\$67,096.68	\$55,432.78	\$11,663.90
Third [Doc. 354]	05/01/2020 – 05/31/2020	\$28,843.00	\$164.50	\$29,007.50	\$23,238.90	\$5,768.60
Fourth [Doc. 406]	06/01/2020 – 06/30/2020	\$9,291.50	\$6,983.66	\$16,275.16	\$14,416.86	\$1,858.30
Fifth [Doc. 423]	07/01/2020 – 07/31/2020	\$5,355.50	\$14,363.51	\$19,719.01	\$18,647.91	\$1,071.10
Sixth [Doc. 440]	08/01/2020 – 08/31/2020	\$8,123.00	\$6,786.37	\$14,909.37	\$13,284.77	\$1,624.60
Seventh [Doc. 467]	09/01/2020 – 09/30/2020	\$15,400.50	\$7,425.94	\$22,826.44	\$19,746.34	\$3,080.10
Eighth [Doc. 486]	10/01/2020 – 10/31/2020	\$45,006.00	\$26,291.02	\$71,297.02	\$62,295.82	\$9,001.20
Ninth [Doc. 502]	11/01/2020 – 11/30/2020	\$41,250.50	\$7,456.59	\$48,707.09	\$40,456.99	\$8,250.10
Tenth [Doc. 521]	12/01/2020 – 12/31/2020	\$27,500.00	\$7,386.01	\$34,886.01	\$29,386.01	\$5,500.00
Eleventh [Doc. 548]	01/01/2021 – 01/31/2021	\$21,061.50	—	\$21,61.50	\$16,849.20	\$4,212.30
Twelfth [Doc. 573]	02/01/2021 – 02/28/2021	\$48,757.50	\$13,957.05	\$62,714.55	\$52,963.05	\$9,751.50
Thirteenth [Doc. 597]	03/01/2021 – 03/31/2021	\$49,201.00	\$9,820.16	\$59,021.16	\$49,180.96	\$9,840.20
Fourteenth [Doc. 617]	04/01/2021 – 04/30/2021	\$15,754.00	\$123.00	\$15,868.00	\$12,719.00	\$3,149.00
Fifteenth [Doc. 631]	05/01/2021 – 05/31/2021	\$16,577.00	\$21,851.19	\$38,428.19	\$35,112.79	\$3,315.40
Sixteenth [Doc. 673]	06/01/2021 – 06/30/2021	\$21,005.00	\$6,600.41	\$27,605.41	\$23,404.41	\$4,201.00
Seventeenth [Doc. 684]	07/01/2021 – 07/31/2021	\$25,930.00	\$6,748.37	\$32,678.37	\$27,492.37	\$5,186.00
Eighteenth [Doc. 699]	08/01/2021 – 08/31/2021	\$6,601.00	\$6,724.37	\$13,325.37	\$12,005.17	\$1,320.20
Nineteenth [Doc. 728]	09/01/2021 – 09/30/2021	\$8,055.00	\$18,088.36	\$26,143.36	\$24,532.36	\$1,611.00
Twentieth [Doc. 747]	10/01/2021 – 10/31/2021	\$4,820.00	\$6,218.37	\$10,498.37	\$9,642.37	\$856.00

¹ Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Doc. 121], the Debtor is authorized to pay an amount equal to 80% of fees and 100% of expenses requested in each Monthly Fee Statement.

² This amount is equal to 20% of the fees requested in each Monthly Fee Statement.

Statement	Period Covered	Fees Requested	Expenses Requested	Total Requested	Payment Authorized ¹	Payment Withheld ²
Twenty-First [Doc. 837]	11/01/2021 – 11/30/2021	\$5,261.00	\$6,117.75	\$11,378.75	\$10,326.55	\$1,052.20
Twenty-Second [Doc. 1024]	12/01/2021 – 12/31/2021	\$9,451.00	\$6,048.86	\$15,499.86	\$13,609.66	\$1,890.20
Twenty-Third [Doc. 1204]	01/01/2022 – 01/31/2022	\$13,287.00	\$5,975.93	\$19,262.93	\$16,605.53	\$2,657.40
Twenty-Fourth [Doc. 1259]	02/01/2022 – 02/28/2022	\$2,342.00	\$6,071.17	\$8,413.17	\$7,944.77	\$468.40
Twenty-Fifth [Doc. 1302]	03/01/2022 – 03/31/2022	\$5,980.00	\$6,070.44	\$12,050.44	\$10,854.44	\$1,196.00
Twenty-Sixth [Doc. 1343]	04/01/2022 – 04/30/2022	\$3,262.00	\$12,972.34	\$16,234.34	\$15,581.94	\$652.40
Twenty-Seventh [Doc. 1386]	05/01/2022 – 05/31/2022	\$4,742.00	\$12,657.56	\$17,399.56	\$16,451.16	\$948.40
Twenty-Eighth [Doc. 1414]	06/01/2022 – 06/30/2022	\$2,440.00	\$6,347.68	\$8,78.68	\$8,299.68	\$488.00
Twenty-Ninth [Doc. 1424]	07/01/2022 – 07/31/2022	\$5,760.00	\$6,117.28	\$11,877.28	\$10,725.28	\$1,152.00
Thirtieth [Doc. 1438]	08/01/2022 – 08/30/2022	\$3,000.00	\$6,076.00	\$9,076.00	\$8,476.00	\$600.00
TOTALS:		\$588,709.50	\$283,890.98	\$872,600.48	\$754,858.58	\$117,741.90

INTERIM FEE APPLICATIONS

Application	Period Covered	Fees Requested	Expenses Requested	Total Requested	Total Allowed
First [Doc. 361]	02/19/2020 – 05/31/2020	\$164,044.50	\$42,611.59	\$206,656.09	\$206,656.09
Second [Doc. 451]	06/01/2020 – 08/31/2020	\$22,770.00	\$28,193.53	\$50,963.53	\$50,963.53
Third [Doc. 508]	09/01/2020 – 11/30/2020	\$101,657.00	\$41,273.55	\$142,930.55	\$142,930.55
Fourth [Doc. 579]	12/01/2020 – 02/28/2021	\$97,319.00	\$21,343.06	\$118,662.06	\$118,662.06
Fifth [Doc. 641]	03/01/2021 – 05/31/2021	\$81,523.00	\$31,794.35	\$113,317.35	\$113,317.35
Sixth [Doc. 709]	06/01/2021 – 08/31/2021	\$53,536.00	\$20,013.64	\$73,549.64	\$73,549.64
Seventh [Doc. 1116]	09/01/2021 – 11/30/2021	\$17,596.00	\$30,424.48	\$48,020.48	\$48,020.48
Eighth [Doc. 1276]	12/01/2021 – 02/28/2022	\$25,080.00	\$18,095.96	\$43,175.96	\$43,175.96
Ninth [Doc. 1388]	03/01/2022 – 05/31/2022	\$13,984.00	\$31,700.34	\$45,684.34	\$45,684.34
TOTALS:		\$577,509.50	\$265,450.50	\$842,960.00	\$842,960.00

Summary of any objections to monthly fee statements and applications: None.

COMPENSATION BY PROFESSIONAL

Name	Position/Start Date/Bar Year	Effective Billing Rate	Billed Hours	Billed Amount
Haverstick, Matthew	Partner/2016/1996	—	—	—
Seiberling, Mark	Partner/2016/2003	—	—	—
Engelmyer, Steve	Partner/1998/1985	—	—	—
Schreiner, Eric	Partner/2000/1995	—	—	—
Voss, Joshua	Partner/2016/2009	\$400.00	28.0	\$11,200.00
Gagne, Paul	Of Counsel/2007/1984	—	—	—
Gorman, James	Associate/2019/2020	—	—	—
Zimmer, Samantha	Associate/2020/2018	—	—	—
Vance, Shohin	Associate/2017/2017	—	—	—
Smalley, Jenna	Paralegal/2014	—	—	—
Bondiskey, Heidi	Paralegal/2018	—	—	—
		Totals:	28.0	\$11,200.00

Professionals	Blended Rate	Total Hours Billed	Total Compensation
Partners	\$400.00	28.0	\$11,200.00
Counsel	—	—	—
Associates	—	—	—
Paraprofessionals	—	—	—
All Attorneys	\$400.00	28.0	\$11,200.00
All Timekeepers	\$400.00	28.0	\$11,200.00

COMPENSATION BY PROJECT CATEGORY

		Hours	Amount
A100	Activities	—	—
A107	Communicate (other outside counsel)	—	—
A108	Communicate (other external)	—	—
B100	Administration	—	—
B110	Case Administration	—	—
B120	Asset Analysis and Recovery	—	—
B140	Relief from Stay/Adequate Projection Proceedings	—	—
B150	Meetings of and Communications with Creditors	—	—
B160	Fee/Employment Applications	—	—
B195	Non-Working Travel	2.1	\$840.00
B200	Operations	—	—
B210	Business Operations	6.7	\$2,680.00
B300	Claims and Plan	—	—
B310	Claims Administration and Objections	16.7	\$6,680.00
B320	Plan and Disclosure Statement	1.7	\$680.00
B400	Bankruptcy-Related Advice	—	—
B410	General Bankruptcy Advice/Opinions	—	—
C200	Researching Law	—	—
L100	Case Assessment, Development & Administration	—	—
L110	Fact Investigation/Development	—	—
L120	Analysis/Strategy	—	—
L140	Document/File Management	—	—
L160	Settlement/Non-Binding ADR	—	—
L190	Other Case Assessment, Development and Admin	—	—
L200	Pre-Trial Pleadings and Motions	—	—
L210	Pleadings	—	—
L250	Other Written Motions and Submissions	—	—
L300	Discovery	—	—
L310	Written Discovery	—	—
L320	Document Production	0.8	\$320.00
	TOTALS:	28.0	\$11,200.00

EXPENSE SUMMARY

Expense Category	Amount
Legal Research	—
Shipping	—
Document Production	—
Litigation Support Vendors	—
Experts	\$18,510.96
Printing	—
Travel Expenses	\$30.00
Totals	\$18,540.96

**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)

**TENTH INTERIM FEE APPLICATION OF KLEINBARD, LLC,
FOR THE PERIOD OF JUNE 1, 2022 THROUGH AUGUST 31, 2022**

A HEARING WILL BE CONDUCTED ON THIS MATTER ON DECEMBER 22, 2022 AT 11:00 A.M. (PREVAILING EASTERN TIME) AT THE RONALD REAGAN FEDERAL BUILDING, 228 WALNUT STREET, ROOM 320, HARRISBURG, PA 17101. IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING, SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-ONE DAYS FROM THE DATE YOU WERE SERVED WITH THIS PLEADING. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

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*”), Rule 2016-1 of the Local Bankruptcy Rules for the Middle District of Pennsylvania (the “*Bankruptcy Local Rules*”), the *Order Approving the Employment and Retention of Kleinbard, LLC as Special Counsel for the Debtor and Debtor in Possession Effective as of the Petition Date* [Dkt. No. 100] (the “*Retention Order*”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Dkt. No. 121] (the “*Interim Compensation Order*”), and the applicable provisions of the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed*

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.

Under United States Code by Attorneys in Large Chapter 11 Cases (the “**U.S. Trustee Guidelines**”), the law firm of Kleinbard, LLC (“**Kleinbard**”), special counsel for the Roman Catholic Diocese of Harrisburg, as debtor and debtor in possession (the “**Debtor**”), hereby files this tenth interim fee application (the “**Fee Application**”) for (a) compensation for the reasonable and necessary legal services Kleinbard rendered to the Debtor from June 1, 2022 through and including August 31, 2022 (the “**Compensation Period**”) and (b) reimbursement of the actual and necessary expenses that Kleinbard incurred during the Compensation Period.

JURISDICTION AND VENUE

2. This Court has jurisdiction to consider this Motion, pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the Middle District of Pennsylvania. This matter is a core proceeding, pursuant to 28 U.S.C. § 157(b), and the Debtor consents to the entry of a final judgment or order with respect to this Motion, if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

3. Venue is proper before this Court, pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

4. On February 19, 2020 (the “**Petition Date**”), the Debtor commenced this chapter 11 case (the “**Chapter 11 Case**”). The Debtor is operating its business and managing its property as a debtor in possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Committee was appointed on March 6, 2020. No request for the appointment of a trustee or examiner has been made in the Chapter 11 Case.

5. A description of the Debtor’s history, business operations, operational structure, the reasons for commencing the Chapter 11 Case are set forth in the *Informational Brief of the Roman Catholic Diocese of Harrisburg* (the “**Informational Brief**”) and the *Declaration of*

Christopher G. Linscott in Support of First Day Motions (the “**Linscott Declaration**” and, with the Informational Brief, collectively, the “**First Day Informational Pleadings**”).

PRELIMINARY STATEMENT

6. During the Compensation Period, Kleinbard advised the Debtor on a variety of complex matters and issues, as a result of which, the Debtor took action to maximize the value of their estate for the benefit of all parties in interest.

7. During the Compensation Period, Kleinbard assisted the Debtor on many matters related to the following primary items:

- a. **Plan and Disclosure Statement.** Kleinbard spent significant time supporting Waller Lansden Dortch & Davis, LLP (“**Waller**”), as Debtor’s primary bankruptcy counsel, in Waller’s efforts to draft the Debtor’s plan and disclosure statement.
- b. **Claims Analysis and Review.** Kleinbard has spent a significant amount of time analyzing and reviewing the numerous claims filed by the tort claimants during the Compensation Period as well as reviewing and analyzing various objections and responses concerning those claims.
- c. **Business Operations.** Kleinbard has spent significant time in support of the Debtor’s business operations, including reviewing and analyzing certain claims and the Debtor’s policies and procedures related to such claims, reviewing and analyzing various reports from vendors, and reviewing and analyzing materials in preparation for audits.

8. In sum, through the efforts of Kleinbard during the Compensation Period, the Debtor has made considerable progress in this Chapter 11 Case and Adversary Proceeding. Given the complexity of this Chapter 11 Case and Adversary Proceeding and the importance of the matters on which Kleinbard has advised the Debtor, Kleinbard respectfully submits that it is appropriate for this Court to enter an order allowing the compensation and reimbursements requested herein.

RETENTION OF KLEINBARD

9. On March 12, 2020, the Court entered the Retention Order authorizing the Debtor's employment and retention of Kleinbard. The Retention Order authorizes the Debtor to compensate and reimburse Kleinbard in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, and the Interim Compensation Order. The Retention Order also authorizes the Debtor to compensate Kleinbard at Kleinbard's hourly rates charged for services of this type and to reimburse Kleinbard for Kleinbard's actual and necessary out-of-pocket expenses incurred, subject to application to this Court. The particular terms of Kleinbard's engagement are detailed in the engagement letter by and between Kleinbard and the Debtor, effective as of February 1, 2020 (the "**Engagement Letter**")

10. The Retention Order authorizes Kleinbard to provide the following services as outlined in the *Debtor's Application for Entry of an Order Approving the Employment and Retention of Kleinbard, LLC as Special Counsel for the Debtor and Debtor in Possession Effective as of the Petition Date* [Dkt. No. 55] (the "**Employment Application**"), consistent with and in furtherance of the services enumerated in the Engagement Letter:

- a. advice and support in connection with the Debtor's chapter 11 bankruptcy proceeding;
- b. advice and support in connection with any ongoing or newly arising criminal or regulatory investigations;
- c. advice and support for seeking insurance coverage, including through litigation in the course of the Debtor's chapter 11 bankruptcy proceeding;
- d. advice and support for various internal investigations; and
- e. advice and support in connection with claims and litigation arising from childhood sexual abuse.

DISINTERESTEDNESS OF KLEINBARD

11. To the best of Kleinbard's knowledge and as disclosed in the Declaration of Matthew Haverstick in support of, and appended to, the Employment Application (the "*Haverstick Declaration*") (a) Kleinbard is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code, as required by section 327(a) of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtor's estate and (b) Kleinbard has no connection to the Debtor, its creditors, or other parties in interest, except as may be disclosed in the Haverstick Declaration.

12. Kleinbard may have in the past represented, may currently represent, and likely in the future will represent parties in interest in connection with matters unrelated to the Debtor. In the Haverstick Declaration, Kleinbard disclosed its connections to parties in interest that it has been able to ascertain using its reasonable efforts. Kleinbard will update the Haverstick Declaration, as appropriate, if Kleinbard becomes aware of relevant and material new information.

13. Kleinbard performed the services for which it is seeking compensation on behalf of the Debtor and its estate, and not on behalf of any committee, creditor, or other entity.

14. Except to the extent of the advance payments paid to Kleinbard that Kleinbard previously disclosed to this Court in the Haverstick Declaration, Kleinbard has received no payment and no promises for payment from any source other than the Debtor for services provided or to be provided in any capacity whatsoever in connection with this Chapter 11 Case.

15. Pursuant to Bankruptcy Rule 2016(b), Kleinbard has not shared, nor has Kleinbard agreed to share (a) any compensation it has received or may receive with another party or person other than with the partners, counsel, and associates of Kleinbard or (b) any compensation another person or party has received or may receive.

**SUMMARY OF PROFESSIONAL COMPENSATION
AND REIMBURSEMENT OF EXPENSES REQUESTED**

16. This Fee Application has been prepared in accordance with the Interim Compensation Order.

17. Kleinbard seeks interim compensation for professional services rendered to the Debtor during the Compensation Period in the amount of \$11,200.00 and reimbursement of actual and necessary expenses incurred in connection with providing such services in the amount of \$18,540.96. During the Compensation Period, Kleinbard attorneys and paraprofessionals expended a total of 28.0 hours for which compensation is requested.

18. As of the date hereof, Kleinbard has received payments totaling \$8,960.00 for fees incurred and \$18,540.96 for expenses incurred relating to the Monthly Fee Statements filed with the Court during this Compensation Period. By this Fee Application, and to the extent such amounts have not been paid by the time of the hearing on this Fee Application, Kleinbard seeks payment of \$11,200.00 for fees and \$18,540.96, for expenses, which amount represents the entire amount of the fees and expenses incurred during the Compensation Period.

19. The fees charged by Kleinbard in this case are billed in accordance with Kleinbard's existing billing rates and procedures in effect during the Compensation Period. The rates Kleinbard charges for the services rendered by its professionals and paraprofessionals in this Chapter 11 Case are the same rates Kleinbard charges for professional and paraprofessional services rendered in comparable bankruptcy and nonbankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy and nonbankruptcy cases in a competitive national legal market.

SUPPORTING DOCUMENTS

20. This Fee Application is supported by the fee statements attached hereto as **Exhibit A-1** (covering the period from June 1, 2022 through June 30, 2022), **Exhibit A-2** (covering the period from July 1, 2022 through July 31, 2022), and **Exhibit A-3** (covering the period from August 1, 2022 through August 31, 2022). These fee statements contain daily time logs describing the time spent by each attorney for this Compensation Period and a detail of expenses incurred by Kleinbard during the Compensation Period. To the best of Kleinbard's knowledge, this Fee Application complies with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, the Court Procedures, the U.S. Trustee Guidelines, and the Interim Compensation Order.

SUMMARY OF SERVICES PERFORMED BY KLEINBARD DURING THE COMPENSATION PERIOD

21. The following is a summary of the professional services rendered by Kleinbard during the Compensation Period, organized in accordance with Kleinbard's internal system of project or work codes. A more detailed identification of the actual services provided is set forth on the attached **Exhibit A-1**, **Exhibit A-2**, and **Exhibit A-3**. If a work code does not appear below, then Kleinbard did not bill significant time for that work code during the Compensation Period, but may bill time for that work code in the future.

- (a) **Business Operations (Task Code B210)**
Fees: \$2,680.00; Total Hours: 6.7

This category includes work related to, among other things, review and analysis of certain claims and the Debtor's policies and procedures related to such claims, including reviewing vendor reports and reviewing and analyzing materials in preparation for audits.

- (b) Claims Administration and Objections (Task Code B310)
Fees: \$6,680.00; Total Hours: 16.7

This category includes work related to, among other things, review and analysis of certain claims and objections and responses related to such claims.

- (c) Plan and Disclosure Statement (Task Code B320)
Fees: \$680.00; Total Hours: 1.7

This category includes work related to the Debtor's plan and disclosure statement.

22. The foregoing professional services performed by Kleinbard were necessary and appropriate in order for Kleinbard to effectively and completely represent the Debtor in this Chapter 11 Case and the Adversary Proceeding. Compensation for such services as requested is commensurate with the complexity, importance, and nature of the issues and tasks involved. In each case, the professional services were performed expeditiously and efficiently.

23. The professional services performed by Kleinbard on behalf of the Debtor during the Compensation Period required an aggregate expenditure of 28.0 recorded hours by Kleinbard's partners, counsel, associates, and paraprofessionals. Of the aggregate time expended, 28.0 recorded hours were expended by partners, 0.0 recorded hours were expended by counsel, 0.0 recorded hours were expended by associates, and 0.0 recorded hours were expended by paraprofessionals.

24. During the Compensation Period, Kleinbard billed the Debtor for time expended by paraprofessionals and attorneys based on a rate of \$400.00 per hour. Allowance of compensation in the amount requested would result in a blended hourly billing rate of approximately \$400.00.

ACTUAL AND NECESSARY DISBURSEMENTS OF KLEINBARD

25. As detailed in **Exhibit A-1**, **Exhibit A-2**, and **Exhibit A-3**, Kleinbard has \$18,540.96 of expenses incurred in providing professional services during the Compensation

Period. These expenses are reasonable and necessary and were essential to, among other things, timely respond to motions and objections and the overall administration of Kleinbard's representation of the Debtor in this Chapter 11 Case.

26. While Kleinbard has not charged the Debtor for any overtime expenses, consistent with firm policy, attorneys and other employees of Kleinbard who worked late into the evenings or on weekends were reimbursed for their reasonable meal costs and their cost for transportation home from the office. Kleinbard's regular practice is not to include components for those charges in overhead when establishing billing rates and to charge its clients for these and all other out-of-pocket disbursements incurred during the regular course of the rendition of services.

27. With respect to photocopying expenses, Kleinbard charges all of its clients \$.10 per page. With respect to facsimile expenses, Kleinbard does not charge for facsimile transmissions, other than the cost of long distance facsimiles at applicable toll charge rates, which invariably are less than \$1.25 per page. These charges are intended to cover Kleinbard's direct operating costs, which costs are not incorporated into the Kleinbard hourly billing rates. The amount of the standard photocopying charge is intended to allow Kleinbard to cover the related expenses of its photocopying service. A determination of the actual expenses per page for photocopying, however, is dependent on both the volume of copies and the total expenses attributable to photocopying on an annual basis.

28. Kleinbard further disbursed payments related to electronic research related to various legal issues on which Kleinbard has advised the Debtor, and certain filing fees.

THE REQUESTED COMPENSATION SHOULD BE APPROVED

29. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 to govern the Court's award of such compensation. 11 U.S.C. § 331. Section 330 provides that a Court may award a

professional employed under section 327 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered [and] reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1).

30. Under section 330 of the Bankruptcy Code, the court “shall consider the nature, the extent, and the value of such services, taking into account all relevant factors,” including—

(A) the time spent on such services;

(B) the rates charged for such services;

(C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

(D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

31. Kleinbard submits that the elements governing awards of compensation under section 330(a)(3) of the Bankruptcy Code justify the allowance in full of the interim compensation requested by Kleinbard in this Fee Application. In this regard, Kleinbard submits that the amount of compensation for fees and expenses incurred by Kleinbard during the Compensation Period is fair and reasonable given (a) the time expended by Kleinbard professionals and paraprofessionals in this chapter 11 case, (b) the value of such services, (c) the necessity of such services rendered on behalf of the Debtor, (d) the complexity of this chapter 11 case, (e) the skills and experience of the Kleinbard professionals and paraprofessionals, who

have provided valuable services to the Debtor, and (f) the fact that the value of such services is reasonable and customary.

32. As set forth in detail in this Fee Application, the professional services Kleinbard provided to the Debtor during the Compensation Period were reasonable, necessary, required a high degree of expertise and skill across a broad range of legal practice areas, and such services yielded substantial benefit to the Debtor and its estate. Accordingly, Kleinbard submits that its request for compensation and reimbursement of expenses on an interim basis is reasonable and proper, and that such factors and standards justify the allowance in full of the requested fees and expenses incurred in its representation of the Debtor during the Compensation Period.

THE DEBTOR CONSENTS TO THE REQUESTED FEES AND EXPENSES

33. The Debtor has been given an opportunity to review the fees and expenses requested herein and has approved the requested amounts.

APPLICANT'S STATEMENT PURSUANT TO U.S. TRUSTEE GUIDELINES

34. Pursuant to the U.S. Trustee Guidelines, Kleinbard (the "*Applicant*") states as follows:

(a) Did Applicant agree to any variations from, or alternatives to, Applicant's standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period?

ANSWER: No.

(b) If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher than 10% or more, did Applicant discuss the reasons for variation with the client?

ANSWER: Not applicable.

(c) Have any of the professionals in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

ANSWER: No.

(d) Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

ANSWER: No.

(e) Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

ANSWER: No.

(f) If the fee application included any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

ANSWER: No.

NOTICE

35. Pursuant to the Interim Compensation Order, notice of this Fee Application 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, Kleinbard respectfully requests entry of an order, substantially in the form attached hereto as **Exhibit B**, (i) awarding interim allowance of Kleinbard's compensation for professional services rendered during the Compensation Period in the amount of \$29,740.96, consisting of \$11,200.00 in fees and \$18,540.96 in actual and necessary expenses, in all instances as incurred during the Compensation Period; (ii) directing payment of the difference between the amounts allowed and any amounts previously paid pursuant to the Interim Compensation Order, and (iii) granting such other and further relief as is just.

Dated: November 29, 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
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-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-1

June Fee Statement

**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)

**TWENTY-EIGHTH MONTHLY FEE STATEMENT OF KLEINBARD, LLC, FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO THE DEBTOR
FOR THE PERIOD OF JUNE 1, 2022 THROUGH JUNE 30, 2022**

Name of Applicant	Kleinbard, LLC
Authorized to provide professional services to	Debtor and Debtor-in-Possession
Effective Date of Retention	March 12, 2020, <i>nunc pro tunc</i> to February 19, 2020 (the “ <i>Petition Date</i> ”)
Period for which compensation and reimbursement are sought	June 1, 2022 through June 30, 2022 (the “ <i>Compensation Period</i> ”)
Amount of Compensation sought as actual, reasonable and necessary	\$2,440.00
Amount of Expense Reimbursement sought as actual, reasonable and necessary	\$6,347.68
Total Amount Sought	\$8,787.68
Total Amount of Compensation (at 80%) and Expenses (at 100%) authorized to be paid per monthly fee applications	\$8,299.68
Blended Rate for all Attorneys	\$400.00
Blended Rate for all Timekeepers	\$400.00

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 law firm of Kleinbard, LLC (“**Kleinbard**”), special 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 \$1,952.00 for the reasonable and necessary legal services Kleinbard rendered to the Debtor during the Compensation Period (80% of \$2,440.00) and (b) reimbursement for 100% of the actual and necessary expenses that Kleinbard incurred, in the amount of \$6,347.68 during the Compensation Period.

Services Rendered and Disbursements Incurred

2. Attached as **Exhibit A** is a billing summary of Kleinbard 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 Kleinbard 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 Kleinbard’s itemized time records of its professionals and paraprofessionals and itemized records of reimbursement sought for the Compensation Period.

4858-8540-5994.1

Reservations

6. This Monthly Fee Statement includes all the information and supporting detail regarding fees and expenses available to Kleinbard 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, Kleinbard 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, Kleinbard, in connection with services rendered on behalf of the Debtor, respectfully requests (a) allowance of compensation and reimbursement in the amount of (i) \$1,952.00 for reasonable and necessary professional services rendered (80% of \$2,440.00) and (ii) \$6,347.68 for 100% of actual and necessary costs and expenses incurred during the Compensation Period, for a total of \$8,299.68 and (b) payment of the forgoing sums.

Dated: July 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
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-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/Start Date/Bar Year	Effective Billing Rate	Bill Hours	Billed Amount
Haverstick, Matthew	Partner/2016/1996	—	—	—
Seiberling, Mark	Partner/2016/2003	—	—	—
Engelmyer, Steve	Partner/1998/1985	—	—	—
Schreiner, Eric	Partner/2000/1995	—	—	—
Voss, Joshua	Partner/2016/2009	\$400.00	6.1	\$2,440.00
Gagne, Paul	Of Counsel/2007/1984	—	—	—
Gorman, James	Associate/2019/2020	—	—	—
Zimmer, Samantha	Associate/2020/2018	—	—	—
Vance, Shohin	Associate/2017/2017	—	—	—
Smalley, Jenna	Paralegal/2014	—	—	—
Bondiskey, Heidi	Paralegal/2018	—	—	—
		Totals	6.1	\$2,440.00

4858-8540-5994.1

EXHIBIT B

COMPENSATION BY PROJECT CATEGORY

		Hours	Amount
A100	Activities	—	—
A107	Communicate (other outside counsel)	—	—
A108	Communicate (other external)	—	—
B100	Administration	—	—
B110	Case Administration	—	—
B120	Asset Analysis and Recovery	—	—
B130	Asset Disposition	—	—
B140	Relief from Stay/Adequate Projection Proceedings	—	—
B150	Meetings of and Communications with Creditors	—	—
B160	Fee/Employment Applications	—	—
B195	Non-Working Travel	—	—
B200	Operations	—	—
B210	Business Operations	1.2	\$480.00
B300	Claims and Plan	—	—
B310	Claims Administration and Objections	4.9	\$1,960.00
B320	Plan and Disclosure Statement	—	—
C100	Fact Gathering	—	—
C200	Researching Law	—	—
L100	Case Assessment, Development & Administration	—	—
L110	Fact Investigation/Development	—	—
L120	Analysis/Strategy	—	—
L140	Document/File Management	—	—
L160	Settlement/Non-Binding ADR	—	—
L190	Other Case Assessment, Development and Admin	—	—
L200	Pre-Trial Pleadings and Motions	—	—
L210	Pleadings	—	—
L250	Other Written Motions and Submissions	—	—
L300	Discovery	—	—
L310	Written Discovery	—	—
L320	Document Production	—	—
	Total	6.1	\$2,440.00

4858-8540-5994.1

EXHIBIT C

EXPENSE SUMMARY

Expense Category	Amount
Legal Research	—
Shipping	—
Document Production	—
Litigation Support Vendors	—
Experts	\$6,347.68
Printing	—
Total	\$6,347.68

4858-8540-5994.1

EXHIBIT D

TIME DETAIL

4858-8540-5994.1



KLEINBARD LLC
3 LOGAN SQUARE
1717 ARCH STREET, 5TH FLOOR
PHILADELPHIA, PA 19103

July 20, 2022

DIOCESE OF HARRISBURG
VERY REV. WILLIAM C. FORREY
4800 UNION DEPOSIT ROAD
HARRISBURG, PA 17111

H10034-10014

BALANCE DUE FOR INVOICES PREVIOUSLY RENDERED	\$19,247.96
TOTAL FEES	----- \$2,440.00
TOTAL DISBURSEMENTS	\$6,347.68
TOTAL CURRENT CHARGES	\$8,787.68
TOTAL NOW DUE	\$28,035.64

KLEINBARD LLC
3 LOGAN SQUARE
1717 ARCH STREET, 5TH FLOOR
PHILADELPHIA, PA 19103

July 20, 2022

Billed through 06/30/22

Bill number 72518

DIOCESE OF HARRISBURG
VERY REV. WILLIAM C. FORREY
4800 UNION DEPOSIT ROAD
HARRISBURG, PA 17111
BANKRUPTCY II

H10034-10014

FOR PROFESSIONAL SERVICES RENDERED

06/01/22	JJV	B210	A101	@ TELEPHONE CALL WITH CLIENT REGARDING [REDACTED]	0.20 hrs	\$80.00
06/02/22	JJV	B310	A104	@ REVIEW DRAFT REPORT	0.20 hrs	\$80.00
06/02/22	JJV	B310	A104	@ REVIEW COMMUNICATIONS REGARDING SETTLEMENT	0.10 hrs	\$40.00
06/03/22	JJV	B210	A104	@ REVIEW DRAFT HANDOUT FROM CLIENT	0.20 hrs	\$80.00
06/03/22	JJV	B310	A107	@ COMMUNICATE WITH B. ROTH REGARDING [REDACTED]	0.50 hrs	\$200.00
06/06/22	JJV	B310	A107	@ REVIEW EMAIL FROM B. ROTH REGARDING [REDACTED]	0.10 hrs	\$40.00
06/08/22	JJV	B310	A107	@ ATTENTION TO COMMUNICATIONS WITH B. ROTH REGARDING [REDACTED]	0.50 hrs	\$200.00
06/09/22	JJV	B310	A107	@ ATTENTION TO COMMUNICATIONS WITH B. ROTH REGARDING [REDACTED]	0.40 hrs	\$160.00
06/13/22	JJV	B210	A106	@ ATTENTION TO COMMUNICATIONS FROM CLIENT REGARDING [REDACTED]	0.20 hrs	\$80.00
06/13/22	JJV	B310	A107	@ REVIEW COMMUNICATIONS FROM B. ROTH REGARDING [REDACTED]	0.10 hrs	\$40.00
06/14/22	JJV	B310	A107	@ ATTENTION TO COMMUNICATIONS FROM B. ROTH REGARDING [REDACTED]	0.90 hrs	\$360.00
06/15/22	JJV	B310	A107	@ ATTENTION TO COMMUNICATIONS FROM B. ROTH REGARDING [REDACTED]	0.20 hrs	\$80.00
06/16/22	JJV	B310	A104	@ REVIEW FILING BY INSURERS	0.20 hrs	\$80.00

06/16/22	JJV	B210	A104		
	@ REVIEW VENDOR REPORT			0.10 hrs	\$40.00
06/17/22	JJV	B210	A104		
	@ REVIEW AND ANALYZE VENDOR REPORT			0.50 hrs	\$200.00
06/17/22	JJV	B310	A107		
	@ TELEPHONE CALL WITH B. ROTH REGARDING [REDACTED]			0.10 hrs	\$40.00
06/20/22	JJV	B310	A106		
	@ PREPARE FOR AND ATTEND VIDEO TELECONFERENCE WITH B. ROTH, C. LINSOTT, AND CLIENT REGARDING [REDACTED]			1.30 hrs	\$520.00
06/21/22	JJV	B310	A104		
	@ REVIEW EMAIL FROM COUNSEL ABOUT CLAIMS			0.10 hrs	\$40.00
06/23/22	JJV	B310	A107		
	@ ATTENTION TO COMMUNICATIONS WITH B. ROTH REGARDING [REDACTED]			0.20 hrs	\$80.00

Total fees for this matter	-----	\$2,440.00
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DISBURSEMENTS

06/30/22	EXPERTS		\$6,347.68
Total disbursements for this matter		-----	\$6,347.68

BILLING SUMMARY

VOSS, JOSH J	6.10 hrs		\$2,440.00
TOTAL FEES		-----	\$2,440.00
TOTAL DISBURSEMENTS			\$6,347.68
TOTAL CURRENT CHARGES			\$8,787.68

Exhibit A-2

July Fee Statement

**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)

**TWENTY-NINTH MONTHLY FEE STATEMENT OF KLEINBARD, LLC, FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO THE DEBTOR
FOR THE PERIOD OF JULY 1, 2022 THROUGH JULY 31, 2022**

Name of Applicant	Kleinbard, LLC
Authorized to provide professional services to	Debtor and Debtor-in-Possession
Effective Date of Retention	March 12, 2020, <i>nunc pro tunc</i> to February 19, 2020 (the “ <i>Petition Date</i> ”)
Period for which compensation and reimbursement are sought	July 1, 2022 through July 31, 2022 (the “ <i>Compensation Period</i> ”)
Amount of Compensation sought as actual, reasonable and necessary	\$5,760.00
Amount of Expense Reimbursement sought as actual, reasonable and necessary	\$6,117.28
Total Amount Sought	\$11,877.28
Total Amount of Compensation (at 80%) and Expenses (at 100%) authorized to be paid per monthly fee applications	\$10,725.28
Blended Rate for all Attorneys	\$400.00
Blended Rate for all Timekeepers	\$400.00

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 law firm of Kleinbard, LLC (“**Kleinbard**”), special 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 **\$4,608.00** for the reasonable and necessary legal services Kleinbard rendered to the Debtor during the Compensation Period (80% of **\$5,760.00**) and (b) reimbursement for 100% of the actual and necessary expenses that Kleinbard incurred, in the amount of **\$6,117.28** during the Compensation Period.

Services Rendered and Disbursements Incurred

2. Attached as **Exhibit A** is a billing summary of Kleinbard 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 Kleinbard 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 Kleinbard’s itemized time records of its professionals and paraprofessionals and itemized records of reimbursement sought for the Compensation Period.

4875-8414-9806.1

Reservations

6. This Monthly Fee Statement includes all the information and supporting detail regarding fees and expenses available to Kleinbard 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, Kleinbard 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, Kleinbard, in connection with services rendered on behalf of the Debtor, respectfully requests (a) allowance of compensation and reimbursement in the amount of (i) \$4,608.00 for reasonable and necessary professional services rendered (80% of \$5,760.00) and (ii) \$6,117.28 for 100% of actual and necessary costs and expenses incurred during the Compensation Period, for a total of \$10,725.28 and (b) payment of the forgoing sums.

Dated: August 22, 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*)
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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)
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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/Start Date/Bar Year	Effective Billing Rate	Bill Hours	Billed Amount
Haverstick, Matthew	Partner/2016/1996	—	—	—
Seiberling, Mark	Partner/2016/2003	—	—	—
Engelmyer, Steve	Partner/1998/1985	—	—	—
Schreiner, Eric	Partner/2000/1995	—	—	—
Voss, Joshua	Partner/2016/2009	\$400.00	14.4	\$5,760.00
Gagne, Paul	Of Counsel/2007/1984	—	—	—
Gorman, James	Associate/2019/2020	—	—	—
Zimmer, Samantha	Associate/2020/2018	—	—	—
Vance, Shohin	Associate/2017/2017	—	—	—
Smalley, Jenna	Paralegal/2014	—	—	—
Bondiskey, Heidi	Paralegal/2018	—	—	—
		Totals	14.4	\$5,760.00

4875-8414-9806.1

EXHIBIT B

COMPENSATION BY PROJECT CATEGORY

		Hours	Amount
A100	Activities	—	—
A107	Communicate (other outside counsel)	—	—
A108	Communicate (other external)	—	—
B100	Administration	—	—
B110	Case Administration	—	—
B120	Asset Analysis and Recovery	—	—
B130	Asset Disposition	—	—
B140	Relief from Stay/Adequate Projection Proceedings	—	—
B150	Meetings of and Communications with Creditors	—	—
B160	Fee/Employment Applications	—	—
B195	Non-Working Travel	2.1	\$840.00
B200	Operations	—	—
B210	Business Operations	1.7	\$680.00
B300	Claims and Plan	—	—
B310	Claims Administration and Objections	9.8	\$3,920.00
B320	Plan and Disclosure Statement	—	—
C100	Fact Gathering	—	—
C200	Researching Law	—	—
L100	Case Assessment, Development & Administration	—	—
L110	Fact Investigation/Development	—	—
L120	Analysis/Strategy	—	—
L140	Document/File Management	—	—
L160	Settlement/Non-Binding ADR	—	—
L190	Other Case Assessment, Development and Admin	—	—
L200	Pre-Trial Pleadings and Motions	—	—
L210	Pleadings	—	—
L250	Other Written Motions and Submissions	—	—
L300	Discovery	—	—
L310	Written Discovery	—	—
L320	Document Production	0.8	\$320.00
	Total	14.4	\$5,760.00

4875-8414-9806.1

EXHIBIT C

EXPENSE SUMMARY

Expense Category	Amount
Legal Research	—
Shipping	—
Document Production	—
Litigation Support Vendors	—
Experts	\$6,117.28
Printing	—
Total	\$6,117.28

4875-8414-9806.1

EXHIBIT D

TIME DETAIL

4875-8414-9806.1



KLEINBARD LLC
3 LOGAN SQUARE
1717 ARCH STREET, 5TH FLOOR
PHILADELPHIA, PA 19103

August 12, 2022

DIOCESE OF HARRISBURG
VERY REV. WILLIAM C. FORREY
4800 UNION DEPOSIT ROAD
HARRISBURG, PA 17111

H10034-10014

BALANCE DUE FOR INVOICES PREVIOUSLY RENDERED	\$28,035.64
TOTAL FEES	----- \$5,760.00
TOTAL DISBURSEMENTS	\$6,117.28
TOTAL CURRENT CHARGES	\$11,877.28
TOTAL NOW DUE	\$39,912.92

KLEINBARD LLC
3 LOGAN SQUARE
1717 ARCH STREET, 5TH FLOOR
PHILADELPHIA, PA 19103

August 12, 2022

Billed through 08/31/22

Bill number 72915

DIOCESE OF HARRISBURG
VERY REV. WILLIAM C. FORREY
4800 UNION DEPOSIT ROAD
HARRISBURG, PA 17111
BANKRUPTCY II

H10034-10014

FOR PROFESSIONAL SERVICES RENDERED

07/05/22	JJV	B310	A107	@ REVIEW COMMUNICATION FROM B. ROTH REGARDING [REDACTED]	0.10 hrs	\$40.00
07/06/22	JJV	B210	A104	@ REVIEW AND ANALYZE COMMUNICATION FROM CLIENT REGARDING [REDACTED]	0.30 hrs	\$120.00
07/06/22	JJV	B310	A108	@ PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL WITH B. ROTH AND COMMITTEE COUNSEL REGARDING SETTLEMENT	0.40 hrs	\$160.00
07/06/22	JJV	B310	A106	@ PREPARE FOR AND PARTICIPATE IN VIDEO TELECONFERENCE WITH B. ROTH, C. LINSKOTT, AND CLIENT REGARDING [REDACTED]	1.30 hrs	\$520.00
07/07/22	JJV	B310	A107	@ ATTENTION TO COMMUNICATIONS FROM B. ROTH REGARDING [REDACTED]	0.10 hrs	\$40.00
07/08/22	JJV	B210	A106	@ ATTENTION TO COMMUNICATION WITH CLIENT REGARDING [REDACTED]	0.10 hrs	\$40.00
07/11/22	JJV	B310	A107	@ ATTENTION TO COMMUNICATIONS FROM B. ROTH REGARDING [REDACTED]	0.10 hrs	\$40.00
07/18/22	JJV	B210	A104	@ ATTENTION TO VENDOR REPORT REGARDING INQUIRY	0.30 hrs	\$120.00
07/22/22	JJV	B210	A106	@ ATTENTION TO INQUIRY FROM CLIENT REGARDING [REDACTED]	0.30 hrs	\$120.00
07/27/22	JJV	B210	A104	@ ATTENTION TO REPORT FROM VENDOR	0.70 hrs	\$280.00
08/01/22	JJV	B310	A108	@ TELEPHONE CALL WITH R. CONNAUGHTON REGARDING [REDACTED]	0.20 hrs	\$80.00
08/01/22	JJV	B310	A107	@ TELEPHONE CALL WITH B. ROTH REGARDING [REDACTED]	0.20 hrs	\$80.00

08/02/22	JJV	B310	A109		
	@ PREPARE FOR AND ATTEND MEDIATION			7.40 hrs	\$2,960.00
08/02/22	JJV	B195	A111		
	@ TRAVEL TO AND FROM HARRISBURG FOR MEDIATION			2.10 hrs	\$840.00
08/03/22	JJV	B320	A103		
	@ DRAFT PROPOSED CHART FOR PLAN			0.80 hrs	\$320.00
Total fees for this matter					----- \$5,760.00

DISBURSEMENTS

07/31/22	EXPERTS				\$81.90
07/31/22	EXPERTS				\$6,035.38
Total disbursements for this matter					----- \$6,117.28

BILLING SUMMARY

VOSS, JOSH J	14.40 hrs		\$5,760.00
TOTAL FEES		-----	\$5,760.00
TOTAL DISBURSEMENTS			\$6,117.28
TOTAL CURRENT CHARGES			\$11,877.28

Exhibit A-3

August Fee Statement

**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 KLEINBARD, LLC, FOR ALLOWANCE OF
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS SPECIAL COUNSEL TO THE DEBTOR FOR THE
PERIOD OF AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

Name of Applicant	Kleinbard, LLC
Authorized to provide professional services to	Debtor and Debtor-in-Possession
Effective Date of Retention	March 12, 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	\$3,000.00
Amount of Expense Reimbursement sought as actual, reasonable and necessary	\$6,076.00
Total Amount Sought	\$9,076.00
Total Amount of Compensation (at 80%) and Expenses (at 100%) authorized to be paid per monthly fee applications	\$2,400.00
Blended Rate for all Attorneys	\$400.00
Blended Rate for all Timekeepers	\$400.00

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 law firm of Kleinbard, LLC (“**Kleinbard**”), special 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 **\$2,400.00** for the reasonable and necessary legal services Kleinbard rendered to the Debtor during the Compensation Period (80% of **\$3,000.00**) and (b) reimbursement for 100% of the actual and necessary expenses that Kleinbard incurred, in the amount of **\$6,076.00** during the Compensation Period.

Services Rendered and Disbursements Incurred

2. Attached as **Exhibit A** is a billing summary of Kleinbard 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 Kleinbard 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 Kleinbard’s itemized time records of its professionals and paraprofessionals and itemized records of reimbursement sought for the Compensation Period.

4875-1747-0516.1

Reservations

6. This Monthly Fee Statement includes all the information and supporting detail regarding fees and expenses available to Kleinbard 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, Kleinbard 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, Kleinbard, in connection with services rendered on behalf of the Debtor, respectfully requests (a) allowance of compensation and reimbursement in the amount of (i) \$2,400.00 for reasonable and necessary professional services rendered (80% of \$3,000.00) and (ii) \$6,076.00 for 100% of actual and necessary costs and expenses incurred during the Compensation Period, for a total of \$8,476.00 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/Start Date/Bar Year	Effective Billing Rate	Bill Hours	Billed Amount
Haverstick, Matthew	Partner/2016/1996	—	—	—
Seiberling, Mark	Partner/2016/2003	—	—	—
Engelmyer, Steve	Partner/1998/1985	—	—	—
Schreiner, Eric	Partner/2000/1995	—	—	—
Voss, Joshua	Partner/2016/2009	\$400.00	7.5	\$3,000.00
Gagne, Paul	Of Counsel/2007/1984	—	—	—
Gorman, James	Associate/2019/2020	—	—	—
Zimmer, Samantha	Associate/2020/2018	—	—	—
Vance, Shohin	Associate/2017/2017	—	—	—
Smalley, Jenna	Paralegal/2014	—	—	—
Bondiskey, Heidi	Paralegal/2018	—	—	—
		Totals	7.5	\$3,000.00

4875-1747-0516.1

EXHIBIT B

COMPENSATION BY PROJECT CATEGORY

		Hours	Amount
A100	Activities	—	—
A107	Communicate (other outside counsel)	—	—
A108	Communicate (other external)	—	—
B100	Administration	—	—
B110	Case Administration	—	—
B120	Asset Analysis and Recovery	—	—
B130	Asset Disposition	—	—
B140	Relief from Stay/Adequate Projection Proceedings	—	—
B150	Meetings of and Communications with Creditors	—	—
B160	Fee/Employment Applications	—	—
B195	Non-Working Travel	—	—
B200	Operations	—	—
B210	Business Operations	3.8	\$1,520.00
B300	Claims and Plan	—	—
B310	Claims Administration and Objections	2.0	\$800.00
B320	Plan and Disclosure Statement	1.7	\$680.00
C100	Fact Gathering	—	—
C200	Researching Law	—	—
L100	Case Assessment, Development & Administration	—	—
L110	Fact Investigation/Development	—	—
L120	Analysis/Strategy	—	—
L140	Document/File Management	—	—
L160	Settlement/Non-Binding ADR	—	—
L190	Other Case Assessment, Development and Admin	—	—
L200	Pre-Trial Pleadings and Motions	—	—
L210	Pleadings	—	—
L250	Other Written Motions and Submissions	—	—
L300	Discovery	—	—
L310	Written Discovery	—	—
L320	Document Production	—	—
	Total	7.5	\$3,000.00

4875-1747-0516.1

EXHIBIT C

EXPENSE SUMMARY

Expense Category	Amount
Legal Research	—
Shipping	—
Document Production	—
Litigation Support Vendors	—
Experts	\$6,046.00
Printing	—
Travel Expenses	\$30.00
Total	\$6,076.00

EXHIBIT D

TIME DETAIL

4875-1747-0516.1



KLEINBARD LLC

3 LOGAN SQUARE

1717 ARCH STREET, 5TH FLOOR
PHILADELPHIA, PA 19103

September 13, 2022

DIOCESE OF HARRISBURG
VERY REV. WILLIAM C. FORREY
4800 UNION DEPOSIT ROAD
HARRISBURG, PA 17111

H10034-10014

BALANCE DUE FOR INVOICES PREVIOUSLY RENDERED	\$12,365.28
TOTAL FEES	----- \$3,000.00
TOTAL DISBURSEMENTS	\$6,076.00
TOTAL CURRENT CHARGES	\$9,076.00
TOTAL NOW DUE	\$21,441.28

KLEINBARD LLC
3 LOGAN SQUARE
1717 ARCH STREET, 5TH FLOOR
PHILADELPHIA, PA 19103

September 13, 2022

Billed through 08/31/22

Bill number 73299

DIOCESE OF HARRISBURG
VERY REV. WILLIAM C. FORREY
4800 UNION DEPOSIT ROAD
HARRISBURG, PA 17111
BANKRUPTCY II

H10034-10014

FOR PROFESSIONAL SERVICES RENDERED

08/10/22	JJV	B310	A106	@ ATTENTION TO COMMUNICATION FROM CLIENT REGARDING [REDACTED]	0.70 hrs	\$280.00
08/11/22	JJV	B310	A106	@ COMMUNICATE WITH CLIENT REGARDING [REDACTED]	0.60 hrs	\$240.00
08/11/22	JJV	B210	A106	@ COMMUNICATE WITH CLIENT REGARDING [REDACTED]	0.40 hrs	\$160.00
08/15/22	JJV	B210	A104	@ REVIEW, ANALYZE AND DRAFT CHART FOR AUDIT	0.80 hrs	\$320.00
08/15/22	JJV	B310	A104	@ REVIEW [REDACTED] PER CLIENT	0.20 hrs	\$80.00
08/17/22	JJV	B210	A106	@ ATTENTION TO COMMUNICATION WITH CLIENT AND FOLLOW UP REGARDING DEMAND	1.90 hrs	\$760.00
08/18/22	JJV	B310	A108	@ ATTENTION TO COMMUNICATION FROM COUNSEL REGARDING CLAIM	0.40 hrs	\$160.00
08/19/22	JJV	B310	A104	@ REVIEW LETTER FROM COUNSEL REGARDING CLAIM	0.10 hrs	\$40.00
08/19/22	JJV	B320	A107	@ ATTENTION TO REPORT FOR PLAN	0.30 hrs	\$120.00
08/22/22	JJV	B210	A106	@ COMMUNICATE WITH CLIENT REGARDING [REDACTED]	0.40 hrs	\$160.00
08/23/22	JJV	B320	A106	@ PREPARE FOR AND ATTEND VIDEO TELECONFERENCE WITH B. ROTH AND CLIENT REGARDING [REDACTED]	1.30 hrs	\$520.00
08/24/22	JJV	B320	A106	@ COMMUNICATE WITH CLIENT REGARDING [REDACTED]	0.10 hrs	\$40.00
08/30/22	JJV	B210	A107	@ COMMUNICATE WITH VENDOR REGARDING REPORT	0.10 hrs	\$40.00
08/31/22	JJV	B210	A107			

@ ATTENTION TO COMMUNICATION FROM T. KERWIN REGARDING CLAIM	0.20 hrs	\$80.00
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Total fees for this matter	-----	\$3,000.00
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DISBURSEMENTS

08/31/22	TRAVEL EXPENSES	\$30.00
08/31/22	EXPERTS	\$42.19
08/31/22	EXPERTS	\$6,003.81

Total disbursements for this matter	-----	\$6,076.00
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BILLING SUMMARY

VOSS, JOSH J	7.50 hrs	\$3,000.00
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TOTAL FEES	-----	\$3,000.00
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TOTAL DISBURSEMENTS		\$6,076.00
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TOTAL CURRENT CHARGES		\$9,076.00
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Exhibit B

Proposed Order

**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)

**ORDER GRANTING TENTH INTERIM FEE APPLICATION OF KLEINBARD, LLC,
FOR THE PERIOD OF JUNE 1, 2022 THROUGH AUGUST 31, 2022**

Upon consideration of the tenth interim fee application of Kleinbard, LLC (“*Kleinbard*”), special counsel to the above-captioned debtor and debtor in possession, for the period from June 1, 2022 through and including August 31, 2022 (the “*Fee Application*”);² and good cause existing therefor,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. Compensation to Kleinbard for professional services rendered during the Compensation Period is allowed on an interim basis in the amount of \$11,200.00.
2. Reimbursement to Kleinbard for expenses incurred during the Compensation Period is allowed on an interim basis in the amount of \$18,540.96.
3. The Debtor is authorized and directed to pay Kleinbard all fees and expenses allowed pursuant to this Order.

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.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Fee Application.