

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

In re:

ROMAN CATHOLIC ARCHBISHOP OF  
BALTIMORE,Debtor.<sup>1</sup>

Chapter 11

Case No. 23-16969-MMH

**MONTHLY FEE STATEMENT OF BLANK ROME, LLP, FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES AS SPECIAL INSURANCE COUNSEL TO THE DEBTOR FOR THE  
PERIOD OF MAY 1, 2024 THROUGH MAY 31, 2024**

Name of Applicant	Blank Rome, LLP
Authorized to provide professional services to	Debtor and Debtor-in-Possession
Effective Date of Retention	November 16, 2023 effective as of September 29, 2023
Period for which compensation and reimbursement are sought	May 1, 2024 through May 31, 2024 (the “ <i>Compensation Period</i> ”)
Amount of Compensation sought as actual, reasonable and necessary	\$64,821.96 <sup>2</sup>
Amount of Expense Reimbursement sought as actual, reasonable and necessary	\$0.00
Total Amount Sought	\$64,821.96
Total Amount of Compensation (at 80%) and Expenses (at 100%) authorized to be paid per monthly fee applications	\$51,857.57
Blended Rate for all Attorneys	\$801.84
Blended Rate for all Timekeepers	\$579.28

<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 1535. The Debtor’s principal place of business is located at 320 Cathedral Street, Baltimore, Maryland 21201.

<sup>2</sup> The Amount of Compensation reflects a 16% fee reduction.

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 *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (Dkt. No. 176) (the “**Interim Compensation Order**”), the law firm of Blank Rome, LLP (“**Blank Rome**”), special insurance counsel to the Roman Catholic Archbishop of Baltimore, 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 \$51,857.57 for the reasonable and necessary legal services Blank Rome rendered to the Debtor during the Compensation Period (80% of \$64,821.96) and (b) reimbursement for 100% of the actual and necessary expenses that Blank Rome incurred, in the amount of \$0.00 during the Compensation Period.

### **Jurisdiction**

2. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Standing Order 2012-05* from the United States District Court for the District of Maryland. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Pursuant to Local Rule 9013-6, the Debtor consents to the entry of a final judgment or order with respect to the 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.

### **Background**

4. On September 29, 2032 (the “**Petition Date**”), the Debtor commenced this Chapter 11 Case. The Debtor is operating its business and managing its property as debtor in possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of

a trustee or examiner has been made in the Chapter 11 Case. On October 11, 2023, an official committee of unsecured creditors (the “**Committee**”) was appointed in this case. (Dkt. No. 84.)

5. A description of the Debtor’s history, business operations, operational structure, the reasons for commencing the Chapter 11 Case, the relief sought from the Court, and the facts and circumstances supporting this Motion are set forth in the *Informational Brief of the Roman Catholic Archbishop of Baltimore* (Dkt. No. 5) and the *Declaration of John Matera in Support of First Day Motions* (Dkt. No. 6).

6. On November 16, 2023, this Court entered that *Order Approving the Employment and Retention of Blank Rome, LLP as Special Insurance Counsel Effective as of the Petition Date* (Dkt. No. 199) (the “**Retention Order**”).

#### **Summary of Professional Compensation and Reimbursement of Expenses Requested**

7. By this Monthly Fee Statement, Blank Rome requests allowance and payment of \$51,857.57 (80% of \$64,821.96) as compensation for professional services rendered to the Debtor during the Compensation Period and allowance and payment of \$0.00 as reimbursement for actual and necessary expenses incurred by Blank Rome during the Compensation Period. All services for which compensation is requested by Blank Rome were performed for or on behalf of the Debtor.

8. During the Compensation Period, Blank Rome received no payment and no promises of payment from any source or services rendered, or to be rendered, in any capacity whatsoever in connection with the matters covered by this Monthly Fee Statement. There is no agreement or understanding between Blank Rome and any other person, other than members of Blank Rome, for the sharing of compensation to be received for services rendered to the Debtor in connection with representation of the Debtor in this chapter 11 case.

9. The fees charged by Blank Rome in connection with the chapter 11 case are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period, and in accordance with the Retention Order. The rates Blank Rome charges for the services rendered by its professionals and paraprofessionals in the chapter 11 case are no greater than the rates Blank Rome charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters. Blank Rome's fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market.

10. Blank Rome's time records comply with the requirements set forth in the *Department of Justice Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases*, including the use of itemized time entries in separate matter numbers for different project types, as hereafter described in greater detail.

#### **Services Rendered and Disbursements Incurred**

11. Attached as **Exhibit A** is a billing summary of Blank Rome 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 Blank Rome professional and paraprofessional.

12. Attached as **Exhibit B** 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.

13. Attached as **Exhibit C** is Blank Rome's itemized time records of its professionals and paraprofessionals and itemized records of reimbursement sought for the Compensation Period.

**Reservations**

14. This Monthly Fee Statement includes all the information and supporting detail regarding fees and expenses available to Blank Rome 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, Blank Rome reserves the right to make an application to the Court for an allowance of such fees and expenses not included in this Monthly Fee Statement.

**Notice**

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

- a. the Debtor, the Roman Catholic Archbishop of Baltimore, Attn: John Matera, 320 Cathedral Street Baltimore, MD, 21201, [jmatera@archbalt.org](mailto:jmatera@archbalt.org);
- b. counsel to the Debtor: (1) Holland & Knight LLP, Attn: Blake D. Roth, 511 Union Street, Suite 2700, Nashville, TN 37219, [blake.roth@hkllaw.com](mailto:blake.roth@hkllaw.com); and (2) YVS Law, LLC, Attn: Catherine Hopkin, 185 Admiral Cochrane Drive, Suite 130, Annapolis, Maryland 21401, [chopkin@yvslaw.com](mailto:chopkin@yvslaw.com);
- c. the Office of the United States Trustee, Attn: Gerald Vetter and Hugh Bernstein, 101 West Lombard Street, Suite 2625, Baltimore, Maryland 21201, [gerald.r.vetter@usdoj.gov](mailto:gerald.r.vetter@usdoj.gov) and [hugh.m.bernstein@usdoj.gov](mailto:hugh.m.bernstein@usdoj.gov); and
- d. counsel to the Committee, (1) Tydings & Rosenberg, LLP, Attn: Richard L. Costella, Esq. and Alan M. Grochal, Esq., One East Pratt Street, Suite 901 Baltimore, MD 21202, [rcostella@tydings.com](mailto:rcostella@tydings.com) and [agrochal@tydings.com](mailto:agrochal@tydings.com); and (2) Stinson LLP, Attn: Nicole Khalouian, 100 Wall Street, Suite 201, New York, NY 10005; [nicole.khalouian@stinson.com](mailto:nicole.khalouian@stinson.com); and (3) Stinson LLP, Attn: Edwin H. Caldie and Robert Kugler, 50 South Sixth Street, Suite 2600, Minneapolis, MN 554002; [ed.caldie@stinson.com](mailto:ed.caldie@stinson.com) and [Robert.kugler@stinson.com](mailto:Robert.kugler@stinson.com).

WHEREFORE, Blank Rome, in connection with services rendered on behalf of the Debtor, respectfully requests (a) allowance of compensation and reimbursement in the amount of

(i) \$51,857.57 for reasonable and necessary professional services rendered (80% of \$64,821.96) and (ii) \$0.00 for 100% of actual and necessary costs and expenses incurred during the Compensation Period, for a total of \$51,857.57, and (b) payment of the forgoing sums.

Dated: June 21, 2024

Respectfully submitted,

/s/ Blake D. Roth

Blake D. Roth (admitted *pro hac vice*)  
Tyler N. Layne (admitted *pro hac vice*)  
HOLLAND & KNIGHT LLP  
511 Union Street, Suite 2700  
Nashville, TN 37219  
Telephone: (615) 244-6380  
Facsimile: (615) 244-6804  
Email: blake.roth@hklaw.com  
tyler.layne@hklaw.com

-and-

Catherine K. Hopkin (Fed. Bar No. 28257)  
YVS LAW, LLC  
185 Admiral Cochrane Drive, Suite 130  
Annapolis, MD 21401  
Telephone: 443.569.0788  
Facsimile: 410.571.2798  
Email: chopkin@yvslaw.com

*Attorneys for the Debtor and Debtor In Possession*

**EXHIBIT A****COMPENSATION BY PROFESSIONAL**

<b>Name</b>	<b>Position/Bar Year/Start Year</b>	<b>Effective Billing Rate</b>	<b>Bill Hours</b>	<b>Billed Amount</b>
James Carter	Partner/2000/2016	\$802.20	3.6	\$2,887.92
James Murray	Partner/1982/2016	\$1,092.00	11.3	\$12,339.60
Jared Zola	Partner/2004/2016	\$865.20	8.5	\$7,354.20
Kyle Brinkman	Partner/2010/2016	\$735.00	24.5	\$18,007.50
Amy Spencer	Associate/1998/2017	\$499.80	2.9	\$1,499.42
Robyn Michaelson	Associate/2014/2016	\$7308.80	4.5	\$3,288.60
Alexander Berman	Associate/2015/2015	\$604.80	5.0	\$3,024.00
Kevin Rogers	Paralegal/2016	\$319.20	51.6	\$16,470.72
		<b>Totals</b>	<b>111.9</b>	<b>\$64,821.96</b>

**EXHIBIT B**

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Amount</b>
Supplies for hearing	—
Online research	—
Meals	—
Travel	—
Conference Calls	—
<b>Total</b>	<b>\$0.00</b>



**EXHIBIT C**

**TIME DETAIL**

**BLANKROME**

1825 EYE STREET NW  
 WASHINGTON, DC 20006-5403  
 (202) 420-2200  
 FEDERAL TAX ID NO. 23-1311874

ARCHDIOCESE OF BALTIMORE  
 ATTN: THOMAS E. ALBAN , DIRECTOR OF RISK  
 MANAGEMENT  
 320 CATHEDRAL STREET  
 BALTIMORE, MD 21201

INVOICE DATE: JUNE 18, 2024  
 CLIENT ID: 167711  
 MATTER NUMBER: 167711-00601 03348  
 INVOICE NUMBER: 2202251

**REGARDING: ARCHDIOCESE OF BALTIMORE  
 INSURANCE ADVICE**

DATE	INVOICE	AMOUNT	CREDITS	BALANCE
02/20/2024	2176577	\$14,892.36	(\$11,913.89)	\$2,978.47
03/11/2024	2180101	\$33,914.58	(\$27,131.66)	\$6,782.92
04/12/2024	2187961	\$36,504.72	(\$29,203.78)	\$7,300.94
05/16/2024	2195242	\$51,579.36	\$0.00	\$51,579.36
<b>BALANCE FORWARD</b>				<b>\$68,641.69</b>
FOR LEGAL SERVICES RENDERED THROUGH 5/31/24			\$64,821.96	
<b>CURRENT INVOICE TOTAL</b>				<b>\$64,821.96</b>
<b>TOTAL AMOUNT DUE, INCLUDING BALANCE FORWARD</b>				<b>\$133,463.65</b>

ACH/WIRE		Mail
Bank Name	Citizens Bank	Blank Rome LLP
Address:	Philadelphia, PA	Attn: Finance Department
Account Title:	Blank Rome LLP	One Logan Square
Account Number:		130 North 18 <sup>th</sup> St
ABA Number:	(Domestic)	Philadelphia, PA 19103-6998
Swift Code	(International)	

To pay by Electronic Funds Transfer, visit [www.BlankRome.com/Payments](http://www.BlankRome.com/Payments)

**BLANKROME**

1825 EYE STREET NW  
 WASHINGTON, DC 20006-5403  
 (202) 420-2200  
 FEDERAL TAX ID NO. 23-1311874

ARCHDIOCESE OF BALTIMORE  
 ATTN: THOMAS E. ALBAN, DIRECTOR OF RISK  
 MANAGEMENT  
 320 CATHEDRAL STREET  
 BALTIMORE, MD 21201

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**REGARDING: ARCHDIOCESE OF BALTIMORE  
 INSURANCE ADVICE**

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**FOR LEGAL SERVICES RENDERED THROUGH MAY 31, 2024**

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
05/06/24	ANALYZE CLAIMS WITH INFORMATION FROM THE LATEST PROOF OF CLAIMS AND THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	4.30	1,372.56
05/07/24	ANALYZE CLAIMS WITH INFORMATION FROM THE LATEST CLAIMS ALONG WITH THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	3.10	989.52
05/07/24	EMAIL B. ROTH REGARDING [REDACTED] [REDACTED]	J. CARTER	0.20	160.44
05/07/24	REVIEW/REVISE FILINGS, DRAFT FILINGS	R. MICHAELSON	0.70	511.56
05/08/24	ASSIST WITH INSURER SERVICE QUESTIONS	R. MICHAELSON	0.40	292.32
05/08/24	UPDATE SPREADSHEET OF CLAIMS WITH INFORMATION FROM THE LATEST CLAIMS AND THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	2.90	925.68
05/08/24	UPDATE SPREADSHEET OF CLAIMS WITH INFORMATION RELATING TO OTHER POTENTIALLY RESPONSIBLE PARTIES	K. ROGERS	1.10	351.12
05/14/24	UPDATE SPREADSHEET OF CLAIMS WITH INFORMATION FROM THOSE LATEST CLAIMS ALONG WITH THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	5.00	1,596.00
05/15/24	REVIEW CARRIER MOTION TO DISMISS	J. MURRAY	0.80	873.60
05/15/24	UPDATE SPREADSHEET OF CLAIMS WITH INFORMATION FROM THE LATEST CLAIMS ALONG WITH THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	0.60	191.52
05/16/24	EMAIL COVERAGE CHART TO INSURER	J. CARTER	0.10	80.22
05/17/24	REVIEW AMENDED COMPLAINT AND MOVING INSURERS' MOTION TO DISMISS TO PREPARE TO DRAFT OPPOSITION	K. BRINKMAN	1.30	955.50
05/17/24	REVIEW CARRIER MOTION TO DISMISS	J. MURRAY	0.70	764.40

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<b>DATE</b>	<b>DESCRIPTION</b>	<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>AMOUNT</b>
05/17/24	REVIEW CLAIMS ANALYSIS TO DATE	J. MURRAY	0.80	873.60
05/17/24	REVIEW CORRESPONDENCE RE FILINGS	R. MICHAELSON	0.10	73.08
05/17/24	CONFERENCE WITH K. BRINKMAN REGARDING [REDACTED]	J. CARTER	0.10	80.22
05/17/24	VARIOUS EMAILS WITH TEAM REGARDING [REDACTED]	J. CARTER	0.20	160.44
05/18/24	DRAFT OUTLINE FOR OPPOSITION TO MOVING INSURERS' MOTION TO DISMISS THE ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	0.70	514.50
05/18/24	REVIEW AMENDED COMPLAINT AND MOVING INSURERS' MOTION TO DISMISS TO PREPARE TO DRAFT OPPOSITION	K. BRINKMAN	0.30	220.50
05/19/24	ANALYZE CHUBB AND HARTFORD MOTION TO DISMISS ADVERSARY PROCEEDING COMPLAINT	J. CARTER	0.80	641.76
05/20/24	ANALYZE CLAIMS WITH INFORMATION FROM THE LATEST PROOFS OF CLAIM AND THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	5.50	1,755.60
05/20/24	DRAFT OPPOSITION TO MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	2.40	1,764.00
05/20/24	RESEARCH IN SUPPORT OF [REDACTED]	K. BRINKMAN	1.00	735.00
05/21/24	UPDATE SPREADSHEET OF CLAIMS WITH INFORMATION FROM THE LATEST CLAIMS ALONG WITH THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	7.30	2,330.16
05/21/24	DRAFT OPPOSITION TO MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	1.40	1,029.00
05/21/24	ANALYZE MOVING INSURERS' CITED CASES TO DRAFT OPPOSITION TO MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	1.20	882.00
05/22/24	DRAFT OPPOSITION TO MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	3.30	2,425.50
05/22/24	ANALYZE MOVING INSURERS' CITED CASES TO DRAFT OPPOSITION TO MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	1.20	882.00
05/23/24	ANALYZE CLAIMS WITH INFORMATION FROM THE LATEST PROOF OF CLAIMS ALONG WITH THE CORRESPONDING	K. ROGERS	6.10	1,947.12

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
	INSURANCE INFORMATION			
05/23/24	DRAFT OPPOSITION TO MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	2.20	1,617.00
05/23/24	ANALYZE CASE LAW TO [REDACTED]	K. BRINKMAN	0.70	514.50
05/23/24	RESEARCH LAW FOR [REDACTED]	A. SPENCER	2.90	1,449.42
05/23/24	REVIEW/ANALYZE DRAFT MEDIATION MOTION	J. CARTER	0.10	80.22
05/23/24	EMAILS WITH J. MURRAY REGARDING [REDACTED]	J. CARTER	0.20	160.44
05/23/24	CONFERENCE WITH INTERSTATE COUNSEL REGARDING POLICY INFORMATION	J. CARTER	0.20	160.44
05/23/24	NUMEROUS EMAILS REGARDING MOTION TO DISMISS AND RELATED PROCEDURAL ISSUES	J. MURRAY	0.80	873.60
05/23/24	REVIEW DRAFT OPPOSITION OUTLINE	J. MURRAY	0.50	546.00
05/24/24	DRAFT OPPOSITION TO MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	0.90	661.50
05/24/24	ANALYZE A. SPENCER RESEARCH TO [REDACTED]	K. BRINKMAN	0.60	441.00
05/24/24	GATHER/REVIEW EVIDENCE OF VARIOUS POLICIES TO BE FORWARDED ON TO AN INSURER	K. ROGERS	0.40	127.68
05/24/24	UPDATE SPREADSHEET OF CLAIMS WITH INFORMATION FROM THE LATEST PROOF OF CLAIMS AND THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	4.60	1,468.32
05/28/24	UPDATE SPREADSHEET OF CLAIMS WITH INFORMATION FROM THE LATEST CLAIMS AND THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	7.40	2,362.08
05/28/24	REVIEW DRAFT OPPOSITION TO MOTION TO DISMISS	J. MURRAY	0.80	873.60
05/28/24	TELECONFERENCE WITH T. BURNS REGARDING [REDACTED]	J. MURRAY	0.30	327.60
05/28/24	REVIEW CHUBB'S RESISTANCE TO EXTENSION AND RESPOND TO SAME	J. MURRAY	0.20	218.40
05/28/24	REVIEW CHUBB'S REQUEST FOR DEBTOR TO AGREE TO WITHDRAW REFERENCE AND RESPOND TO SAME	J. MURRAY	0.20	218.40
05/28/24	REVIEW AND ANALYZE INSURERS' MOTION TO DISMISS ADVERSARY PROCEEDING (1.5);	J. ZOLA	3.50	3,028.20

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
	REVIEW AND EDIT DRAFT MEMORANDUM OF LAW IN OPPOSITION TO INSURERS' MOTION TO DISMISS (2.0)			
05/28/24	REVIEW CORRESPONDENCE REGARDING REQUEST FOR EXTENSION TO RESPOND TO MOTION	K. BRINKMAN	0.20	147.00
05/28/24	ANALYZE STRATEGY FOR OPPOSITION TO INSURERS' MOTION TO DISMISS	K. BRINKMAN	0.80	588.00
05/28/24	CALL WITH T. BURNS, J. BAIR, J. MURRAY, J. CARTER REGARDING [REDACTED]	K. BRINKMAN	0.50	367.50
05/28/24	ANALYZE CHUBB AND HARTFORD FILINGS IN THE DEBTOR'S BANKRUPTCY PROCEEDING FOR RELEVANCE TO OPPOSITION TO MOTION TO DISMISS	K. BRINKMAN	0.60	441.00
05/28/24	REVISE OPPOSITION TO INSURERS' MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	0.50	367.50
05/28/24	PREPARE FOR CONFERENCE WITH COMMITTEE REGARDING HARTFORD AND CHUBB'S MOTION TO DISMISS	J. CARTER	0.10	80.22
05/28/24	REVIEW DRAFT OPPOSITION TO MOTION TO DISMISS ADVERSARY PROCEEDING AND PROVIDE COMMENTS	J. CARTER	0.50	401.10
05/28/24	CONFERENCE WITH COMMITTEE COUNSEL REGARDING MOTION TO DISMISS ADVERSARY PROCEEDING	J. CARTER	0.20	160.44
05/28/24	CALL WITH K. ROGERS RE [REDACTED]	R. MICHAELSON	0.10	73.08
05/29/24	PULL DOCUMENTS FROM THE COURT DOCKET FOR ATTORNEY REVIEW	K. ROGERS	0.50	159.60
05/29/24	UPDATE SPREADSHEET OF CLAIMS WITH INFORMATION FROM THE LATEST PROOF OF CLAIMS ALONG WITH THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	1.80	574.56
05/29/24	ANALYZE CASE LAW TO DRAFT OPPOSITION TO MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	0.50	367.50
05/29/24	REVISE OPPOSITION TO INSURERS' MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT	K. BRINKMAN	1.30	955.50
05/29/24	ANALYZE FIREMANS FUND'S MOTION TO WITHDRAW THE REFERENCE	K. BRINKMAN	0.80	588.00
05/29/24	REVIEW DRAFT OF CHUBB OPPOSITION	J. MURRAY	0.50	546.00
05/29/24	REVIEW STATUS OF POC ANALYSIS	J. MURRAY	0.60	655.20
05/29/24	TELECONFERENCE WITH PARISH COUNSEL	J. MURRAY	0.40	436.80

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
	REGARDING [REDACTED]			
05/29/24	REVIEW MOTION TO WITHDRAW REFERENCE	J. MURRAY	0.80	873.60
05/29/24	EMAIL MATERIALS TO K. BRINKMAN REGARDING [REDACTED]	J. CARTER	0.30	240.66
05/29/24	ANALYZE MOTION TO WITHDRAW REFERENCE	J. CARTER	0.20	160.44
05/29/24	REVIEW FILINGS	R. MICHAELSON	0.20	146.16
05/29/24	REVIEW AND EDIT DRAFT MEMORANDUM OF LAW IN OPPOSITION TO INSURERS' MOTION TO DISMISS	J. ZOLA	0.50	432.60
05/29/24	REVIEW AND ANALYZE FIREMAN'S FUND'S MOTION TO WITHDRAW REFERENCE	J. ZOLA	1.50	1,297.80
05/29/24	CONFER WITH TEAM SEVERAL TIMES REGARDING [REDACTED]	J. ZOLA	1.00	865.20
05/30/24	UPDATE SPREADSHEET OF CLAIMS WITH INFORMATION FROM THE LATEST PROOF OF CLAIMS ALONG WITH THE CORRESPONDING INSURANCE INFORMATION	K. ROGERS	1.00	319.20
05/30/24	REVIEW MOTION TO WITHDRAW REFERENCE AND RELATED ISSUES	J. MURRAY	1.50	1,638.00
05/30/24	REVIEW STATUS OF POC ANALYSIS	J. MURRAY	0.90	982.80
05/30/24	EMAILS WITH T. ALBAN REGARDING [REDACTED]	J. MURRAY	0.10	109.20
05/30/24	TELECONFERENCE WITH PARISH COUNSEL REGARDING [REDACTED]	J. MURRAY	0.40	436.80
05/30/24	BEGIN RESEARCH FOR [REDACTED]	A. BERMAN	1.80	1,088.64
05/30/24	DRAFT RESPONSE TO EMAIL FROM T. ALBAN REGARDING [REDACTED]	J. CARTER	0.40	320.88
05/30/24	REVISE OPPOSITION TO INSURERS' MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT PER J. ZOLA COMMENTS	K. BRINKMAN	0.60	441.00
05/30/24	REVIEW/REVISE DRAFT PRO HAC PAPERS	R. MICHAELSON	1.00	730.80
05/30/24	RESEARCH/REVIEW/ANALYZE DOCKETS, FILINGS IN CONNECTION WITH DRAFT OPPOSITION PAPERS	R. MICHAELSON	1.40	1,023.12
05/31/24	DRAFT ANALYSIS OF WITHDRAWAL OF REFERENCE OPPOSITION	A. BERMAN	1.30	786.24
05/31/24	RESEARCH FOURTH CIRCUIT CASE LAW REGARDING WITHDRAWAL OF REFERENCE MOTION	A. BERMAN	1.90	1,149.12
05/31/24	REVIEW AND EDIT UPDATED DRAFT	J. ZOLA	2.00	1,730.40



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JUNE 18, 2024

DATE	DESCRIPTION	TIMEKEEPER	HOURS	AMOUNT
	MEMORANDUM OF LAW IN OPPOSITION TO INSURERS' MOTION TO DISMISS			
05/31/24	RESEARCH/REVIEW/ANALYZE DOCKETS, FILINGS IN CONNECTION WITH DRAFT OPPOSITION PAPERS	R. MICHAELSON	0.60	438.48
05/31/24	REVISE OPPOSITION TO INSURERS' MOTION TO DISMISS ADVERSARY PROCEEDING AMENDED COMPLAINT PER J. MURRAY, J. ZOLA COMMENTS	K. BRINKMAN	1.10	808.50
05/31/24	ANALYZE RESEARCH RESULTS IN CONNECTION WITH POTENTIAL OPPOSITION TO FIREMANS FUND'S MOTION TO WITHDRAW THE REFERENCE	K. BRINKMAN	0.40	294.00
05/31/24	REVIEW DRAFT OPPOSITION TO MOTION TO DISMISS AND FORWARD TO TEAM	J. MURRAY	1.00	1,092.00
<b>TOTAL SERVICES</b>				<b>\$64,821.96</b>

**CURRENT INVOICE TOTAL**

**\$64,821.96**

**TIME AND FEE SUMMARY**

TIMEKEEPER	RATE	HOURS	FEES
JAMES CARTER	802.20	3.60	2,887.92
JAMES MURRAY	1,092.00	11.30	12,339.60
JARED ZOLA	865.20	8.50	7,354.20
KYLE BRINKMAN	735.00	24.50	18,007.50
ROBYN MICHAELSON	730.80	4.50	3,288.60
ALEXANDER H. BERMAN	604.80	5.00	3,024.00
AMY J. SPENCER	499.80	2.90	1,449.42
KEVIN ROGERS	319.20	51.60	16,470.72
<b>TOTALS</b>		<b>111.90</b>	<b>\$64,821.96</b>