

**Objection Deadline: December 17, 2024**

BURNS BAIR LLP

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*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

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

In re:  
THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
  
Debtor.

Chapter 11  
Case No. 20-12345 (MG)

**FORTY-EIGHTH MONTHLY FEE STATEMENT OF BURNS BAIR LLP, AS  
SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS, FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors</u>
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	<u>October 1, 2024 – October 31, 2024</u>
Amount of Compensation sought as actual, reasonable, and necessary:	<u>\$156,409.50</u> <u>50% of which is \$78,204.75</u>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$3,814.96</u>
TOTAL (50% of fees and 100% of costs)	<u>\$82,019.71</u>

**This is the forty-eighth monthly fee statement.**

**PRELIMINARY STATEMENT**

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this forty-eighth monthly statement (the “Monthly Statement”) for the period from October 1, 2024 through October 31, 2024 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests interim allowance and payment of compensation in the amount of \$78,204.75 (50% of \$156,409.50) for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair; and (b) reimbursement of actual and necessary costs and expenses in the amount of \$3,814.96.

**FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

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

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975.00	58.10	\$56,647.50
Jesse Bair	Partner	2020	2013	\$625.00	68.40	\$42,750.00
Morgan Stippel	Associate	N/A	2018	\$420.00	9.80	\$4,116.00
Brian Cawley	Associate	N/A	2020	\$420.00	37.30	\$15,666.00
Nathan Kuenzi	Associate	N/A	2020	\$420.00	80.30	\$33,726.00
Karin Jonch-Clausen	Associate	N/A	2020	\$420.00	2.40	\$1,008.00
Alexander Castro	Associate	N/A	2024	\$420.00	1.80	\$756.00
Katie Sticklen	Associate	N/A	2024	\$420.00	3.80	\$1,596.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	.40	\$144.00
<b>TOTAL:</b>					<b>262.30</b>	<b>\$156,409.50</b>

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

### **NOTICE AND OBJECTION PROCEDURES**

3. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee - NY (the "U.S. Trustee"), Alexander Hamilton Custom House, One Bowling Green, Room 534, New York, NY 10004-1408 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

4. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by December 17, 2024 (the "**Objection Deadline**") setting forth the nature of the objection and the amount of fees or expenses at issue.

5. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 50% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To

the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: December 2, 2024

BURNS BAIR LLP

/s/ Jesse J. Bair

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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

# EXHIBIT A

# Burns | Bair

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608-286-2302  
www.BurnsBair.com

**The Official Committee of Unsecured Creditors of The  
Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 11/30/2024

**Bill # :** 01583

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/1/2024	Jesse Bair	Review joint letter to the Court in Arrowood district court action re opening of Arrowood ancillary proceeding and Court Order granting extension to more fully respond to same (.1);	0.10	\$62.50
10/1/2024	Jesse Bair	Review B. Michael correspondence re Debtor's proposed revisions to the Committee's Plan edits (.1);	0.10	\$62.50
10/1/2024	Brian Cawley	Correspond with the debtor and T. Burns re joint letter providing status update re Arrowood ancillary proceeding (.4);	0.40	\$168.00
10/1/2024	Timothy Burns	Prepare for state court counsel and Committee meeting re trust allocation protocol and Arrowood recovery issues (1.7); participate in state court counsel meeting re same (1.0); participate in Committee meeting re same (1.4); participate in additional call with PSZJ and state court counsel re Arrowood issues (.2);	4.30	\$4,192.50
10/1/2024	Jesse Bair	Review the carriers' preliminary Plan edits (.1);	0.10	\$62.50
10/2/2024	Nathan Kuenzi	Prepare for meet and confer with the debtor and Committee professionals re ongoing Plan term negotiations (.2);	0.20	\$84.00
10/2/2024	Nathan Kuenzi	Participate in meet and confer with the debtor and Committee professionals re ongoing Plan term negotiations (1.0);	1.00	\$420.00
10/2/2024	Jesse Bair	Review correspondence with the debtor and Arrowood re additional status update letter to the Court re Arrowood litigation next-steps (.1);	0.10	\$62.50

10/2/2024	Timothy Burns	Review and revise plan documents for insurance purposes (4.1); participate in calls with PSZJ re same (.8); participate in meet and confer with Committee professionals and the debtor re ongoing plan term negotiations (1.0); participate in follow-up calls with the debtor and Committee professionals re same (.8);	6.70	\$6,532.50
10/2/2024	Katie Sticklen	Research insurance experience re potential Trustee candidate (2.7); draft memo summarizing same (1.1);	3.80	\$1,596.00
10/2/2024	Jesse Bair	Review additional correspondence with the debtor and Committee professionals re ongoing negotiations re various Plan and Disclosure Statement terms (.1); review I. Nasatir's suggested disclosure statement edits (.1);	0.20	\$125.00
10/2/2024	Morgan Stippel	Legal research re insurance assignment issues in connection with proposed joint Plan (.9);	0.90	\$378.00
10/2/2024	Nathan Kuenzi	Analyze Arrowood order and research issues stemming from creation of ancillary proceeding (.5);	0.50	\$210.00
10/3/2024	Morgan Stippel	Review and analyze insurance language of confirmed Plans in connection with assessing the debtor's trust channeling proposal (3.8);	3.80	\$1,596.00
10/3/2024	Nathan Kuenzi	Participate in conference with T. Burns re revisions to disclosure statement re Arrowood (.1);	0.10	\$42.00
10/3/2024	Nathan Kuenzi	Participate in Plan page turn with PSZJ and T. Burns (.9);	0.90	\$378.00
10/3/2024	Nathan Kuenzi	Draft revisions to disclosure statement re Arrowood issues (.7);	0.70	\$294.00
10/3/2024	Morgan Stippel	Participate in conference with T. Burns re research project re the debtor's trust channeling proposal (.3);	0.30	\$126.00
10/3/2024	Morgan Stippel	Additional legal research re insurance issues in connection with the debtor's trust channeling proposal (1.3);	1.30	\$546.00
10/3/2024	Nathan Kuenzi	Analyze insurance issues re Plan design with trust as defendant as opposed to the Diocese and potential non-settling insurer objections to same (3.3);	3.30	\$1,386.00
10/3/2024	Nathan Kuenzi	Participate in conference with T. Burns re assignments re Arrowood and plan issues (.2);	0.20	\$84.00
10/3/2024	Nathan Kuenzi	Participate in post-Arrowood call discussion with T. Burns re next-steps (.1); participate in additional conference with T. Burns re ongoing Plan negotiations (.1);	0.20	\$84.00

10/3/2024	Timothy Burns	Review correspondence with J. Stang re call with mediator (.1); prepare for and meet with M. Stippel re assignment re debtor's trust channeling proposal (.3); review and respond to state court counsel correspondence re Arrowood meeting (.2); met with N. Kuenzi re assignments re Arrowood and plan (.2); participate in Plan page turn with PSZJ and N. Kuenzi (.9); attend post-call meeting with N. Kuenzi (.1); review and respond to correspondence with B. Michael re plan language (.1); review and revise disclosure statement for insurance purposes (.8); meet with N. Kuenzi re same (.1); participate in call with state court counsel and Committee professionals re Arrowood issues (.5); participate in call with N. Kuenzi re same (.1);	3.40	\$3,315.00
10/3/2024	Nathan Kuenzi	Prepare for call with state court counsel and Committee professionals re Arrowood issues (1.0); participate in call with state court counsel and Committee professionals re same (.5);	1.50	\$630.00
10/4/2024	Nathan Kuenzi	Additional review of draft Plan in preparation for ongoing negotiations re same (.5);	0.50	\$210.00
10/4/2024	Brian Cawley	Analyze and review filings related to Delaware and New York ancillary proceeding against Arrowood and coverage action materials in preparation for drafting Committee position re stay and next-steps in Arrowood coverage action (2.8);	2.80	\$1,176.00
10/4/2024	Alexander Castro	Research case law re potential stay issues re the Arrowood coverage action (1.8);	1.80	\$756.00
10/4/2024	Brian Cawley	Begin drafting Committee section of the parties' joint update letter to the Court in the Arrowood coverage action (1.5);	1.50	\$630.00
10/4/2024	Morgan Stippel	Draft email memo to T. Burns re analysis of insurance language of confirmed Plans in connection with assessing the debtor's trust channeling proposal (.3);	0.30	\$126.00
10/4/2024	Nathan Kuenzi	Analyze Superintendent/Delaware Receiver positions to date regarding the maintenance of actions by insolvent insurer despite stay in connection with ongoing Arrowood issues (.7);	0.70	\$294.00
10/4/2024	Brian Cawley	Additional case law research re stay issues in connection with the Arrowood coverage action (.4);	0.40	\$168.00



10/4/2024	Timothy Burns	Review and edit revised draft of the disclosure statement (.8); prepare for call with debtor's special insurance counsel re Arrowood (.6); participate in call with the debtor re same (.6); participate in post-call with associates re projects re same (.1); review and edit revised draft of the Plan (1.1); participate in portion of page turn with Committee professionals re ongoing Plan edits (1.0);	4.20	\$4,095.00
10/4/2024	Jesse Bair	Review correspondence with the debtor and Committee professionals re additional insurance-related Plans issues and call to discuss same (.1);	0.10	\$62.50
10/4/2024	Morgan Stippel	Finish reviewing and analyzing insurance language of confirmed Plans in connection with assessing the debtor's trust channeling proposal (.5);	0.50	\$210.00
10/4/2024	Brian Cawley	Participate in call with the debtor and Committee professionals re Arrowood ancillary proceeding and joint status letter in the Arrowood coverage action (.6); participate in post-meeting call with T. Burns and N. Kuenzi re follow-up assignments re same (.1);	0.70	\$294.00
10/4/2024	Nathan Kuenzi	Participate in call with the debtor and Committee professionals re Arrowood ancillary proceeding and joint status letter in the Arrowood coverage action (.6); participate in post-meeting call with T. Burns and B. Cawley re follow-up assignments re same (.1);	0.70	\$294.00
10/4/2024	Nathan Kuenzi	Participate in page turn with Committee professionals re ongoing Plan edits (1.2);	1.20	\$504.00
10/4/2024	Nathan Kuenzi	Analyze issues pending in Arrowood actions maintained by Delaware Receiver and the draft Plan of Reorganization in connection with ongoing Plan language negotiations (1.2);	1.20	\$504.00
10/4/2024	Jesse Bair	Review correspondence with Committee professionals re Trust Agreement revisions (.1);	0.10	\$62.50

10/5/2024	Timothy Burns	Brief review of draft Trust Agreement (.2); review draft Committee Plan Support Letter and correspondence re same (.2); review Interstate's comments on draft plan (.2); participate in call with the debtor and Committee professionals re plan and related documents (1.0); participate in additional call with the debtor, Committee professionals, and the insurers same (.9); participate in supplemental call with the Committee professionals re same and ongoing Plan revisions (.7);	3.20	\$3,120.00
10/5/2024	Jesse Bair	Review correspondence with Committee professionals and state court counsel re Trustee selection (.1);	0.10	\$62.50
10/5/2024	Jesse Bair	Review T. Burns email memo re insurance-related Plan revisions (.1);	0.10	\$62.50
10/5/2024	Nathan Kuenzi	Prepare for call with the debtor and insurers re Plan revisions (.1); participate in call with the debtor, Committee professionals, and insurers re same (.9);	1.00	\$420.00
10/5/2024	Nathan Kuenzi	Review draft Trust Agreement (.2);	0.20	\$84.00
10/5/2024	Nathan Kuenzi	Participate in call with the Committee professionals re ongoing Plan revisions (.7);	0.70	\$294.00
10/5/2024	Nathan Kuenzi	Participate in call with the debtor and Committee professionals re plan and related documents (1.0);	1.00	\$420.00
10/5/2024	Jesse Bair	Review various correspondence with the Debtor and Committee professionals re additional edits to the Plan-related documents and list of additional defendant released claims (.2);	0.20	\$125.00
10/5/2024	Jesse Bair	Review draft Committee Plan support letter (.1); review correspondence with Committee professionals re additional potential edits to same (.1);	0.20	\$125.00
10/6/2024	Jesse Bair	Review and respond to correspondence with B. Michael and state court counsel re Arrowood coverage period (.1);	0.10	\$62.50
10/6/2024	Jesse Bair	Participate in call with Committee professionals re final revisions and edits to the Plan (1.0); participate in follow-up call with T. Burns re same and Arrowood issues (.2);	1.20	\$750.00
10/6/2024	Timothy Burns	Review the Diocese's proposed edits to draft plan (.7); review Interstate's draft settlement agreement (.9); participate in call with Committee professionals re ongoing revisions to the Plan (1.0); participate in follow-up call with J. Bair re same and Arrowood issues (.2);	2.80	\$2,730.00

10/6/2024	Jesse Bair	Review the debtor's additional edits to the revised Plan draft (.2); review correspondence with the debtor and insurers re same (.1);	0.30	\$187.50
10/6/2024	Nathan Kuenzi	Participate in call with Committee professionals re final revisions and edits to the Plan (1.0);	1.00	\$420.00
10/6/2024	Jesse Bair	Review and respond to correspondence with N. Kuenzi re LMI settlement agreement (.1);	0.10	\$62.50
10/6/2024	Nathan Kuenzi	Analyze draft settlement agreements provided by LMI and Interstate (2.5);	2.50	\$1,050.00
10/7/2024	Jesse Bair	Participate in conference with T. Burns re Arrowood Plan issues (.2);	0.20	\$125.00
10/7/2024	Nathan Kuenzi	Review draft trust allocation protocol (.3);	0.30	\$126.00
10/7/2024	Nathan Kuenzi	Continue reviewing and analyzing draft settlement agreements provided by LMI and Interstate (2.6);	2.60	\$1,092.00
10/7/2024	Timothy Burns	Participate in conference with J. Bair re Arrowood Plan issues (.2); review correspondence re additional revisions to the Plan (.6); participate in call with Committee professionals re ongoing Plan revisions (.9); review final Plan edits received from Diocese (.2); review correspondence with the debtor and Committee professionals and Judge Gerber re plan edits (.1); review correspondence with the re committee support letter (.1); review B. Michael correspondence re upcoming Committee meeting (.1);	2.20	\$2,145.00
10/7/2024	Jesse Bair	Participate in portion of additional call with Committee professionals re continuing Plan revisions and edits (.7);	0.70	\$437.50
10/7/2024	Nathan Kuenzi	Review and analyze latest iteration of draft Plan in connection with continuing plan negotiations (.8);	0.80	\$336.00
10/7/2024	Nathan Kuenzi	Participate in call with Committee professionals re continuing Plan revisions and edits (1.2);	1.20	\$504.00
10/7/2024	Brian Cawley	Finish drafting Committee section of joint status update letter to the Court in the Arrowood coverage action (2.7);	2.70	\$1,134.00
10/7/2024	Jesse Bair	Participate in portion of call with Committee professionals re Committee responses to the debtor's latest plan revisions (.3);	0.30	\$187.50
10/7/2024	Nathan Kuenzi	Draft revised versions of the insurer settlement agreements to harmonize defined terms with the draft Plan of Reorganization (2.5);	2.50	\$1,050.00

10/7/2024	Jesse Bair	Review further revised version of the Plan and Trust Agreement received from the debtor (.4); review Plan exhibits (.3);	0.70	\$437.50
10/7/2024	Nathan Kuenzi	Participate in call with Committee professionals re Committee responses to the debtor's latest plan revisions (.8);	0.80	\$336.00
10/8/2024	Nathan Kuenzi	Draft revised Committee section of joint letter to the district court re Arrowood status and next-steps (1.8);	1.80	\$756.00
10/8/2024	Morgan Stippel	Continue legal research re insurance issues in connection with the debtor's trust channeling proposal (1.9);	1.90	\$798.00
10/8/2024	Jesse Bair	Review and edit draft Interstate settlement agreement (2.1); review B. Michael proposed Plan edits (.1); correspond with Committee professionals re same and suggested edits to the Interstate settlement agreement (.2);	2.40	\$1,500.00
10/8/2024	Nathan Kuenzi	Review J. Bair comments to Interstate settlement agreement and integrate into draft (.3);	0.30	\$126.00
10/8/2024	Nathan Kuenzi	Continue drafting revised insurer settlement agreements to harmonize defined terms with the draft Plan of Reorganization (4.4);	4.40	\$1,848.00
10/8/2024	Nathan Kuenzi	Participate in conference with T. Burns re changes/edits needed to status update letter in the Arrowood coverage action (.2);	0.20	\$84.00
10/8/2024	Timothy Burns	Review and edit Diocese's revisions to Arrowood draft letter to court (.4); review internal draft of Intervenor's section of letter (.2); participate in conference with N. Kuenzi re assignment re letter (.2); correspond with the debtor re Arrowood letter (.1); review PSIP monthly claims report (.1); review and revise updated version of status letter to the Court in the Arrowood coverage action (.8); review correspondence re same and meeting (.2);	2.00	\$1,950.00
10/8/2024	Jesse Bair	Begin reviewing and editing the LMI settlement agreement (.3);	0.30	\$187.50
10/8/2024	Jesse Bair	Review joint letter to the district court re Arrowood updates (.2); draft revised Committee section of same (.3); review and respond to correspondence with PSZJ and BB teams re same (.2);	0.70	\$437.50
10/8/2024	Nathan Kuenzi	Review and edit joint status update letter in the Arrowood coverage action to incorporate suggestions from PSZJ (.4);	0.40	\$168.00

10/9/2024	Timothy Burns	Participate in conference with J. Bair re ancillary receiver filings (.1); conference with N. Kuenzi re assignment re same (.1); review Arrowood ancillary receivership administrative filings (.4); participate in call with Committee professionals re draft insurance settlement agreements (.7); meet with team re Arrowood developments (.2);	1.50	\$1,462.50
10/9/2024	Nathan Kuenzi	Correspond with New York Liquidation Bureau re follow-up from call re Arrowood issues (.2);	0.20	\$84.00
10/9/2024	Nathan Kuenzi	Revise Arrowood Guaranty Fund memo and related materials in light of recent developments in the Arrowood ancillary proceeding (.6);	0.60	\$252.00
10/9/2024	Nathan Kuenzi	Draft email memo summarizing call with the New York Liquidation Bureau and recommended next-steps (.4);	0.40	\$168.00
10/9/2024	Jesse Bair	Review correspondence with the debtor and Arrowood re additional revisions to the joint letter to the district court re Arrowood developments and case status (.1);	0.10	\$62.50
10/9/2024	Nathan Kuenzi	Participate in call with Committee professionals re draft insurance settlement agreements (.7)	0.70	\$294.00
10/9/2024	Nathan Kuenzi	Review B. Michael revisions to draft LMI settlement agreement (1.5);	1.50	\$630.00
10/9/2024	Brian Cawley	Analyze correspondence re Arrowood liquidation proceedings and begin preparing materials for presentation on same (.5);	0.50	\$210.00
10/9/2024	Brian Cawley	Discuss ancillary proceeding and Arrowood liquidation procedure project with T. Burns (.2);	0.20	\$84.00
10/9/2024	Nathan Kuenzi	Participate in call with the New York Liquidation Bureau re Arrowood issues (.3);	0.30	\$126.00
10/9/2024	Brian Cawley	Draft email memo to BB team re updates in the Arrowood ancillary proceeding (.3);	0.30	\$126.00
10/9/2024	Jesse Bair	Review N. Kuenzi email memo re outcome of call with the New York Liquidation Bureau re Arrowood Guaranty Fund process (.1); participate in conference with T. Burns re recent Arrowood ancillary receiver filings (.1);	0.20	\$125.00
10/9/2024	Jesse Bair	Participate in conference with BB team re Arrowood developments re liquidation and Guaranty Fund issues (.2);	0.20	\$125.00
10/9/2024	Jesse Bair	Participate in call with Committee professionals re revisions to the insurance settlement agreements (.7);	0.70	\$437.50
10/9/2024	Nathan Kuenzi	Participate in conference with BB team re Arrowood developments re liquidation and Guaranty Fund issues (.2);	0.20	\$84.00

10/9/2024	Nathan Kuenzi	Correspond with the debtor re Committee revisions to joint letter to the Court in the Arrowood coverage action (.2);	0.20	\$84.00
10/9/2024	Nathan Kuenzi	Further analysis of LMI/Interstate settlement agreements in connection with ongoing negotiations re same (.4);	0.40	\$168.00
10/9/2024	Nathan Kuenzi	Draft email memo to state court counsel re Arrowood proof of claim issues (1.2);	1.20	\$504.00
10/9/2024	Nathan Kuenzi	Correspond with I. Nasatir re Arrowood issues (.4);	0.40	\$168.00
10/9/2024	Morgan Stippel	Complete legal research re insurance issues in connection with the debtor's trust channeling proposal (.8);	0.80	\$336.00
10/9/2024	Nathan Kuenzi	Participate in conference with T. Burns re Arrowood status and email memo to state court counsel (.1);	0.10	\$42.00
10/9/2024	Nathan Kuenzi	Correspond with B. Michael re LMI/Interstate settlement agreement edits (.1);	0.10	\$42.00
10/9/2024	Nathan Kuenzi	Draft further revisions to joint letter to district court re Arrowood issues based on recent discussion with the New York Liquidation Bureau (.2);	0.20	\$84.00
10/9/2024	Nathan Kuenzi	Research issues regarding Arrowood and interactions with Delaware Receiver (1.5);	1.50	\$630.00
10/10/2024	Jesse Bair	Participate in call with Committee professionals re Arrowood Guaranty Fund process and strategy re same (1.2);	1.20	\$750.00
10/10/2024	Timothy Burns	Review and respond to correspondence with Committee professionals re recommendations re preserving Arrowood claims (1.2); meet with N. Kuenzi re same (.2); participate in call with Committee professionals re Arrowood proof of claims issues (1.2); participate in call with state court counsel re same (.3); review correspondence re same with Committee professionals and the New York Liquidation Bureau (.2);	3.10	\$3,022.50
10/10/2024	Jesse Bair	Review correspondence from the debtor re co-defendant releases and additional Plan edits (.1);	0.10	\$62.50
10/10/2024	Nathan Kuenzi	Correspond with I. Nasatir re Arrowood issues and positions re same (.2);	0.20	\$84.00
10/10/2024	Nathan Kuenzi	Participate in call with Committee professionals re Committee responses to the insurers' Plan edits and settlement agreement revisions (1.3);	1.30	\$546.00
10/10/2024	Nathan Kuenzi	Analyze additional issues related to Arrowood liquidation procedures (1.7); correspond with T. Burns and J. Bair re same (.4);	2.10	\$882.00

10/10/2024	Nathan Kuenzi	Participate in conference with T. Burns re outstanding issues re Arrowood strategy and communications to state court counsel re same (.2);	0.20	\$84.00
10/10/2024	Nathan Kuenzi	Draft revised version of memo re Arrowood liquidation proof of claim issues to incorporate additional suggestions from PSZJ (.7);	0.70	\$294.00
10/10/2024	Jesse Bair	Review correspondence with N. Kuenzi and New York Liquidation Bureau re Guaranty Fund issues (.2); participate in conference with BB team re same (.1);	0.30	\$187.50
10/10/2024	Jesse Bair	Review final version of joint letter in the Arrowood district court action and order extending stay for 60 days (.1);	0.10	\$62.50
10/10/2024	Nathan Kuenzi	Review and respond to additional correspondence with the New York Liquidation Bureau re Arrowood issues (.3);	0.30	\$126.00
10/10/2024	Nathan Kuenzi	Review debtor correspondence re additional defendant releases (.2);	0.20	\$84.00
10/10/2024	Jesse Bair	Participate in call with Committee professionals re Committee responses to the insurers' Plan edits and settlement agreement revisions (1.3);	1.30	\$812.50
10/10/2024	Nathan Kuenzi	Participate in call with I. Nasatir re Arrowood issues (1.0);	1.00	\$420.00
10/10/2024	Jesse Bair	Continue reviewing and editing the LMI settlement agreement, including review of suggested revisions received from B. Michael (.5); correspond with B. Michael re same and call to discuss same and Plan revisions (.1);	0.60	\$375.00
10/10/2024	Brian Cawley	Additional analysis and assessment re procedures for Arrowood liquidation recovery (.3);	0.30	\$126.00
10/11/2024	Nathan Kuenzi	Revise and edit email memo to state court counsel re Arrowood proof of claim issues to incorporate suggested revisions from T. Burns (.5); participate in conference with T. Burns re same (.2);	0.70	\$294.00

10/11/2024	Timothy Burns	Participate in state court counsel meeting for insurance purposes (.8); review and revise Arrowood memo (.2); participate in conference with N. Kuenzi re same (.2); review correspondence with Debtor and PSZJ re draft approval order (.1); review correspondence from future claims rep re edits to plan related documents (.1); review B. Michael correspondence re changes to Interstate agreement (.1); review correspondence with PSZJ and Delaware receiver representative re Arrowood related meeting and correspond with N. Kuenzi re same (.1); review correspondence with PSZJ re same (.1); review correspondence with the insurers re settlement agreements (.1);	1.80	\$1,755.00
10/11/2024	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case updates, Plan issues, Trustee selection, and insurance settlement agreement status (.8);	0.80	\$500.00
10/11/2024	Jesse Bair	Review and edit further revised version of the Interstate settlement agreement (.6); correspond with PSZJ re same (.1);	0.70	\$437.50
10/11/2024	Jesse Bair	Review revised version of the LMI settlement agreement (1.3);	1.30	\$812.50
10/11/2024	Jesse Bair	Participate in call with B. Michael re ongoing negotiations of insurance settlement agreements and meet and confer re same (.2);	0.20	\$125.00
10/11/2024	Jesse Bair	Review draft status update letter in the Evanston district court action (.1);	0.10	\$62.50
10/12/2024	Jesse Bair	Participate in conference with T. Burns re case status, developments, and related insurance projects (.1);	0.10	\$62.50
10/12/2024	Timothy Burns	Review correspondence with J. Bair and B. Michael re draft sale order (.1); review joint letter to district court re Evanston (.1); review correspondence with I. Nasatir and Delaware Receiver re Arrowood liquidation (.1);	0.30	\$292.50
10/12/2024	Jesse Bair	Review and edit revised insurer sale approval order (.7);	0.70	\$437.50
10/12/2024	Timothy Burns	Participate in conference with J. Bair re case status, developments, and related insurance projects (.1);	0.10	\$97.50
10/12/2024	Jesse Bair	Review revised Arrowood claim count list (.1);	0.10	\$62.50
10/13/2024	Nathan Kuenzi	Participate in meet and confer with the Debtor and insurers re insurance settlement agreement edits and finalization (2.0);	2.00	\$840.00
10/13/2024	Nathan Kuenzi	Draft supplemental email memo to state court counsel re Arrowood proof of claim issues (.5);	0.50	\$210.00



10/13/2024	Timothy Burns	Review B. Michael correspondence re Arrowood memo revisions (.1); review correspondence with N. Kuenzi re finalizing same (.1); review and revise supplemental Arrowood email memo re Arrowood proof of claim issues (.2); review correspondence with the Debtor, Committee professionals, and insurers re settlement agreements and plan edits (.4); review and respond to internal emails re Arrowood proofs of claim, privilege issues, and meeting (.3), correspond with PSZJ re same (.3), correspond with New York and Delaware receivers re same (.2);	1.60	\$1,560.00
10/13/2024	Jesse Bair	Prepare for meet and confer with the insurers and debtor re finalization of the insurance settlement agreements (.1); participate in meet and confer with the insurers and debtor re same (2.0);	2.10	\$1,312.50
10/13/2024	Nathan Kuenzi	Draft further revised version of memo re Arrowood liquidation proof of claim issues to incorporate suggestions from B. Michael (.7);	0.70	\$294.00
10/14/2024	Nathan Kuenzi	Review and respond to state court counsel questions re Arrowood liquidation process (.4);	0.40	\$168.00
10/14/2024	Jesse Bair	Participate in call with Committee professionals re preparations and strategy for upcoming call with the Arrowood Delaware Receiver (.5);	0.50	\$312.50
10/14/2024	Brian Cawley	Begin drafting detailed PowerPoint presentation re Delaware liquidation proceedings and New York ancillary proceedings for Arrowood in connection with upcoming state court counsel and town hall meetings (7.2);	7.20	\$3,024.00
10/14/2024	Nathan Kuenzi	Correspond with I. Nasatir re New York Liquidation Bureau Arrowood issues (.2);	0.20	\$84.00

10/14/2024	Timothy Burns	Review and respond to correspondence with PSZJ re Arrowood Delaware meeting and correspond with J. Bair and N. Kuenzi re same (.2); review and finalize Arrowood memos and related materials for state court counsel (.7); participate in call with Committee professionals re preparations and strategy for call with Arrowood Delaware liquidator (.5); correspond with N. Kuenzi and J. Bair re Arrowood issues (.1); review and respond to I. Nasatir correspondence re state court counsel Arrowood memos (.1); review and respond to correspondence with PSZJ re Delaware liquidator meeting agenda (.1); review correspondence with state court counsel re Arrowood questions (.1); correspond with N. Kuenzi re same (.1); review and respond to multiple correspondence with state court counsel re Arrowood issues (.3); participate in call with J. Stang re Arrowood issues and trustee selection (.3);	2.50	\$2,437.50
10/14/2024	Nathan Kuenzi	Revise and edit exhibits to Arrowood Guaranty Fund memo to state court counsel (.5);	0.50	\$210.00
10/14/2024	Nathan Kuenzi	Participate in call with Committee professionals re preparations and strategy for upcoming call with the Arrowood Delaware Receiver (.5);	0.50	\$210.00
10/14/2024	Brian Cawley	Respond to J. Bair request re recent Arrowood filings (.2);	0.20	\$84.00
10/14/2024	Jesse Bair	Revise, edit, and finalize memo and related materials to state court counsel re Arrowood liquidation and Guaranty Fund process (.6); review and respond to follow-up correspondence with state court counsel re same (.2);	0.80	\$500.00
10/14/2024	Jesse Bair	Provide instructions to B. Cawley re revising PowerPoint presentation to state court counsel re Arrowood liquidation and Guaranty Fund process (.1);	0.10	\$62.50
10/15/2024	Jesse Bair	Participate in Committee meeting re various Plan-related issues (2.2); participate in post-meeting call with Committee professionals re outcome of meeting and next-steps in light of same (.3);	2.50	\$1,562.50
10/15/2024	Brian Cawley	Research Delaware and New York liquidation proceedings for procedural steps involved in claim filing and recovery (2.0);	2.00	\$840.00
10/15/2024	Nathan Kuenzi	Review revised versions of Plan documents circulated by the debtor (.6);	0.60	\$252.00

10/15/2024	Nathan Kuenzi	Correspond with state court counsel re Arrowood questions (.1);	0.10	\$42.00
10/15/2024	Timothy Burns	Review correspondence with J. Stang re trustee candidate (.1); review and respond to correspondence with state court counsel re Arrowood proof of claim (.1); participate in conference with N. Kuenzi re Arrowood issues (.2); participate in call with J. Bair re outcome of meeting with Arrowood receiver (.2); participate in Committee meeting re various Plan and insurance settlement agreement issues (2.2); participate in post-meeting call with Committee professionals re outcome of same and next-steps (.3);	3.10	\$3,022.50
10/15/2024	Brian Cawley	Continue drafting detailed PowerPoint presentation re Delaware liquidation proceedings and New York ancillary proceedings for Arrowood in connection with upcoming state court counsel and town hall meetings (5.9);	5.90	\$2,478.00
10/15/2024	Nathan Kuenzi	Review I. Nasatir correspondence re outcome of call with Arrowood Receiver (.3); draft revised memo re Arrowood claim process incorporating same (.7);	1.00	\$420.00
10/15/2024	Nathan Kuenzi	Participate in conference with T. Burns re outstanding Arrowood issues (.2);	0.20	\$84.00
10/15/2024	Jesse Bair	Prepare for meeting with the Arrowood receiver (.1); participate in call with the Arrowood receiver and I. Nasatir re liquidation proceeding issues (.7); participate in post-meeting call with I. Nasatir re outcome of meeting and next-steps (.3); participate in call with T. Burns re same and next-steps re liquidation proceeding and Guaranty Fund process (.2);	1.30	\$812.50
10/16/2024	Nathan Kuenzi	Draft potential agenda for upcoming call with the New York Liquidation Bureau (.2);	0.20	\$84.00
10/16/2024	Nathan Kuenzi	Brief review of draft Arrowood presentation (.1);	0.10	\$42.00
10/16/2024	Jesse Bair	Review and edit revised version of the Interstate settlement agreement (1.1); correspond with Committee professionals re same (.1); review correspondence with the debtor and PSZJ re same and Trust agreement edits (.1);	1.30	\$812.50
10/16/2024	Nathan Kuenzi	Correspond with T. Burns re revisions to Arrowood materials for use in connection with town hall meeting (.1);	0.10	\$42.00
10/16/2024	Jesse Bair	Correspond with BB team re finalization of supplemental Arrowood correspondence to state court counsel re liquidation and Guaranty Fund process (.1);	0.10	\$62.50

10/16/2024	Jesse Bair	Review and edit draft claimant release (.6); correspond with B. Michael re same (.1);	0.70	\$437.50
10/16/2024	Nathan Kuenzi	Correspond with state court counsel re Arrowood proof of claim issues (.2);	0.20	\$84.00
10/16/2024	Nathan Kuenzi	Draft additional version of Arrowood memo and exhibits for use in connection with town hall meeting (.5);	0.50	\$210.00
10/16/2024	Timothy Burns	Correspond with state court counsel re Arrowood proofs of claim and process (.2);	0.20	\$195.00
10/17/2024	Jesse Bair	Review draft agenda for call with New York Liquidation Bureau (.1);	0.10	\$62.50
10/17/2024	Jesse Bair	Review correspondence with the debtor re proposed settlements with certain additional insureds and Arrowood disclosure statement objection extension (.1);	0.10	\$62.50
10/17/2024	Jesse Bair	Review correspondence with the debtor and PSZJ re comments and revisions to the Interstate settlement agreement (.1);	0.10	\$62.50
10/17/2024	Jesse Bair	Review revised insurance-related Plan exhibits (.1);	0.10	\$62.50
10/17/2024	Nathan Kuenzi	Participate in call with the New York Liquidation Bureau re Arrowood issues (1.0);	1.00	\$420.00
10/17/2024	Nathan Kuenzi	Draft revised agenda for call with the New York Liquidation Bureau (.6);	0.60	\$252.00
10/17/2024	Nathan Kuenzi	Participate in post-call meeting with I. Nasatir re outcome of same and next-steps re various Arrowood issues (.4);	0.40	\$168.00
10/17/2024	Timothy Burns	Prepare for meeting with New York Liquidation Bureau re Arrowood issues (.2); participate in portion of meeting with the NYLB re same (.5);	0.70	\$682.50
10/17/2024	Nathan Kuenzi	Draft memo re outcome and key takeaways from meeting with the New York Liquidation Bureau (.6);	0.60	\$252.00
10/18/2024	Brian Cawley	Begin implementing partner feedback into Arrowood liquidation presentation (1.0);	1.00	\$420.00
10/18/2024	Nathan Kuenzi	Review most recent iterations of Plan-related documents, incorporating additional revisions from the insurers and debtor (.8);	0.80	\$336.00
10/18/2024	Nathan Kuenzi	Draft revised summary of procedures for recovering from the Security Fund, incorporating key takeaways from recent call with the NYLB (.4);	0.40	\$168.00
10/18/2024	Timothy Burns	Initial review of Arrowood presentation (.3); correspond with B. Cawley re same (.1); detailed review and line edits of Arrowood presentation (.8); review email memo re outcome of call with Delaware liquidator (.2); correspond with team re presentation point re same (.1);	1.50	\$1,462.50

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10/19/2024	Jesse Bair	Review most recent version of the Interstate settlement agreement circulated by the debtor (.2); correspond with PSZJ re same (.1);	0.30	\$187.50	
10/19/2024	Jesse Bair	Brief review of revised version of the LMI settlement agreement (.2);	0.20	\$125.00	
10/20/2024	Nathan Kuenzi	Revise and edit memo re outcome and key takeaways from meeting with the New York Liquidation Bureau (.5); correspond with I. Nasatir, T. Burns, J. Bair re same (.1);	0.60	\$252.00	
10/20/2024	Brian Cawley	Continue implementing T. Burns feedback into Arrowood liquidation presentation (2.1);	2.10	\$882.00	
10/21/2024	Jesse Bair	Review and edit revised LMI settlement agreement (1.0); correspond with B. Michael re same (.1);	1.10	\$687.50	
10/21/2024	Timothy Burns	Begin reviewing Arrowood's proposed changes to the disclosure statement (.4); review correspondence with Committee professionals re same (.3);	0.70	\$682.50	
10/21/2024	Timothy Burns	Participate in conference with J. Bair re draft plan and settlement status and upcoming disclosure statement hearing (.2); review correspondence with the Debtor and PSZJ re plan drafts (.2);	0.40	\$390.00	
10/21/2024	Jesse Bair	Participate in conference with T. Burns re settlement agreement and Plan revisions (.2);	0.20	\$125.00	
10/21/2024	Jesse Bair	Review correspondence with the debtor re Interstate settlement agreement edits and co-defendant settlement updates (.1);	0.10	\$62.50	
10/21/2024	Nathan Kuenzi	Review most recent draft of Plan Documents circulated by B. Michael (.4);	0.40	\$168.00	
10/21/2024	Brian Cawley	Participate in BB team meeting re case status and ongoing insurance projects (.1);	0.10	\$42.00	
10/21/2024	Timothy Burns	Participate in BB team meeting re case status and ongoing insurance projects (.1);	0.10	\$97.50	
10/21/2024	Nathan Kuenzi	Analyze Arrowood's proposed edits to the Plan Documents (.6); review related correspondence with Committee professionals re same (.3);	0.90	\$378.00	
10/21/2024	Jesse Bair	Participate in BB team conference re ongoing settlement agreement and Plan negotiation issues (.1);	0.10	\$62.50	
10/21/2024	Jesse Bair	Begin reviewing Arrowood's suggested Plan edits (.3); correspond with PSZJ re same (.1);	0.40	\$250.00	
10/21/2024	Nathan Kuenzi	Participate in BB team conference re ongoing settlement agreement and Plan negotiation issues (.1);	0.10	\$42.00	
10/21/2024	Brian Cawley	Research effective disclaimer issue and waiver of coverage defenses in connection with Arrowood action (1.4);	1.40	\$588.00	

10/22/2024	Jesse Bair	Review correspondence with the debtor and insurers re finalization of the insurance settlement agreements and sale order (.1); participate in conference with T. Burns re same and ongoing insurance-related Plan revisions (.1);	0.20	\$125.00
10/22/2024	Jesse Bair	Review and edit most recent version of the Interstate settlement agreement (.6); correspond with PSZJ re same (.1);	0.70	\$437.50
10/22/2024	Jesse Bair	Continue reviewing Arrowood's suggested Plan edits (.6);	0.60	\$375.00
10/22/2024	Timothy Burns	Meet with J. Bair re disclosure statement, plan, and settlement agreement edits (.1); correspond with Committee professionals re same (.2);	0.30	\$292.50
10/22/2024	Nathan Kuenzi	Analyze revisions to plan of reorganization circulated by Arrowood and comments prepared by B. Michael in response to same (.8);	0.80	\$336.00
10/22/2024	Jesse Bair	Participate in call with PSZJ re Arrowood's suggested Plan edits (.5);	0.50	\$312.50
10/22/2024	Jesse Bair	Participate in second call with PSZJ re Arrowood's suggested Plan edits and Committee responses to same (.7);	0.70	\$437.50
10/22/2024	Jesse Bair	Correspond with PSZJ re follow-up re Arrowood suggested Plan edits (.1);	0.10	\$62.50
10/22/2024	Jesse Bair	Participate in portion of call with the Debtor, future claims rep, and PSZJ re Arrowood's suggested Plan edits (.3);	0.30	\$187.50
10/23/2024	Nathan Kuenzi	Analyze Arrowood objection to approval of disclosure statement and summarize arguments raised (1.4);	1.40	\$588.00
10/23/2024	Jesse Bair	Participate in call with PSZJ re additional revisions to the Interstate settlement agreement and Committee responses to Arrowood's Plan edits (1.6);	1.60	\$1,000.00
10/23/2024	Jesse Bair	Correspond with PSZJ re Arrowood's disclosure statement objection (.1); participate in call with T. Burns re Arrowood disclosure statement objection and Arrowood ancillary receivership (.2);	0.30	\$187.50
10/23/2024	Timothy Burns	Participate in conference with state court counsel re Arrowood proof of claim issues (.8); participate in call with J. Bair re Arrowood disclosure statement objection and Arrowood ancillary receivership (.2);	1.00	\$975.00
10/24/2024	Jesse Bair	Review various correspondence with Interstate and Committee professionals re ongoing settlement agreement negotiations (.2);	0.20	\$125.00

10/24/2024	Jesse Bair	Review PSZJ email memo re responses to the US Trustee's disclosure statement objection (.1);	0.10	\$62.50
10/24/2024	Jesse Bair	Review revised version of Committee edits to Plan in light of Arrowood objections (.2); review and respond to correspondence with PSZJ re response to Arrowood's disclosure statement objections (.1);	0.30	\$187.50
10/24/2024	Brian Cawley	Draft revised version of detailed PowerPoint presentation re Delaware liquidation proceedings and New York ancillary proceedings for Arrowood in connection with upcoming state court counsel and town hall meetings, incorporating suggestions received from T. Burns (2.7); review internal memos re recent call with NYLB in connection with Arrowood issues (.3);	3.00	\$1,260.00
10/24/2024	Timothy Burns	Meet with J. Bair re strategy and upcoming DS hearing (.2); meet with internal team re Arrowood status, strategy and assignments (.5);	0.70	\$682.50
10/24/2024	Jesse Bair	Review Arrowood's disclosure statement objection (.5);	0.50	\$312.50
10/24/2024	Jesse Bair	Participate in conference with T. Burns re disclosure statement hearing preparations and strategy (.2);	0.20	\$125.00
10/24/2024	Brian Cawley	Participate in conference with BB team re Arrowood OSC objection, Town Hall presentation, and related Guaranty Fund process issues (.5);	0.50	\$210.00
10/24/2024	Nathan Kuenzi	Participate in conference with BB team re Arrowood OSC objection, Town Hall presentation, and related Guaranty Fund process issues (.5);	0.50	\$210.00
10/24/2024	Nathan Kuenzi	Correspond with I. Nasatir re recent call with the NYLB (.2);	0.20	\$84.00
10/24/2024	Timothy Burns	Review PSZJ correspondence re US Trustee objections to the disclosure statement (.2);	0.20	\$195.00
10/24/2024	Nathan Kuenzi	Review Arrowood Order to Show Cause (.4); begin drafting motion to clarify same re proof of claim process (1.1);	1.50	\$630.00
10/24/2024	Nathan Kuenzi	Analyze statutes and statements of the NYLB in connection with Arrowood recovery issues (1.2); draft revised instructions to state court re Arrowood proof of claim issues (1.0);	2.20	\$924.00
10/24/2024	Jesse Bair	Participate in conference with BB team re Arrowood OSC objection, Town Hall presentation, and related Guaranty Fund process issues (.5);	0.50	\$312.50

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10/24/2024	Jesse Bair	Review N. Kuenzi email memo re recent call with the New York Liquidation Bureau re Arrowood issues (.1);	0.10	\$62.50	
10/24/2024	Jesse Bair	Participate in meet and confer with the debtor, insurers, and Committee professionals re disclosure statement objections and ongoing settlement agreement and Plan edits (.5);	0.50	\$312.50	
10/24/2024	Nathan Kuenzi	Analyze most recent versions of insurance-related Plan documents and provisions, including settlement agreement drafts circulated by Interstate (.5);	0.50	\$210.00	
10/24/2024	Timothy Burns	Review correspondence with the Debtor, PSZJ, and J. Bair re draft plan, settlement agreements and related documents (.2);	0.20	\$195.00	
10/25/2024	Jesse Bair	Participate in second meet and confer with the debtor, PSZJ, and the future claims rep re additional insurance settlement agreement revisions and Plan edits (1.3); participate in post-call with UCC professionals re outcome of same and next-steps (.3);	1.60	\$1,000.00	
10/25/2024	Jesse Bair	Review and revise updated version of insurance sale order (.5);	0.50	\$312.50	
10/25/2024	Jesse Bair	Review correspondence with the debtor and insurers re US Trustee call and related objections (.1);	0.10	\$62.50	
10/25/2024	Jesse Bair	Participate in meet and confer with Interstate, the debtor, and B. Michael re ongoing negotiations on the Interstate settlement agreement (1.1);	1.10	\$687.50	
10/25/2024	Jesse Bair	Draft and send to debtor proposed revision to Interstate settlement agreement provision (.1);	0.10	\$62.50	
10/25/2024	Jesse Bair	Review and edit the revised LMI settlement agreement (.8); correspond with PSZJ re same (.1);	0.90	\$562.50	
10/26/2024	Jesse Bair	Review the debtor's reply in support of its disclosure statement (.3); review future claims rep's statement in support of same (.1);	0.40	\$250.00	
10/26/2024	Jesse Bair	Review correspondence with the debtor and future claims rep re ongoing insurance settlement agreement and sale order negotiations (.1);	0.10	\$62.50	
10/26/2024	Nathan Kuenzi	Continue drafting Motion for Clarification re Arrowood Ancillary Receivership proceedings (2.0);	2.00	\$840.00	
10/26/2024	Nathan Kuenzi	Participate in conference with J. Bair re motion for clarification re Arrowood Order to Show Cause (.2);	0.20	\$84.00	



10/26/2024	Jesse Bair	Participate in conference with N. Kuenzi re potential Committee response to NYLB Order to Show Cause (.2);	0.20	\$125.00
10/28/2024	Jesse Bair	Review and edit additional Disclosure Statement revisions received from Arrowood (1.3); correspond with PSZJ re potential resolution of same (.2); participate in conference with T. Burns re disclosure statement hearing strategy (.2);	1.70	\$1,062.50
10/28/2024	Jesse Bair	Participate in meet and confer with the Debtor and Arrowood re Arrowood's suggested Plan and disclosure statement edits (.5); participate in post-meeting call with PSZJ re same and ongoing insurance settlement negotiations (.3);	0.80	\$500.00
10/28/2024	Nathan Kuenzi	Prepare for Arrowood town hall meeting with state court counsel (.2);	0.20	\$84.00
10/28/2024	Timothy Burns	Prepare for townhall meeting re Arrowood Guaranty Fund process (1.1); participate in townhall meeting re same (1.0); participate in internal team meeting re outcome of same and next-steps (.2);	2.30	\$2,242.50
10/28/2024	Jesse Bair	Review and edit the debtor's revised version of the insurance sale order (.4); correspond with PSZJ re same (.1);	0.50	\$312.50
10/28/2024	Nathan Kuenzi	Analyze issues regarding Security Fund coverage for deceased claimants (.5);	0.50	\$210.00
10/28/2024	Jesse Bair	Participate in state court counsel town-hall re Plan issues and Arrowood Guaranty Fund process (1.0);	1.00	\$625.00
10/28/2024	Nathan Kuenzi	Correspond with T. Burns and J. Bair re Arrowood Order to Show Cause objection/motion for clarification (.1);	0.10	\$42.00
10/28/2024	Nathan Kuenzi	Participate in BB team meeting re outcome of Arrowood townhall meeting and next-steps re same (.2);	0.10	\$42.00
10/28/2024	Nathan Kuenzi	Correspond with state court counsel re Arrowood instruction sheet and exhibits (.1);	0.10	\$42.00
10/28/2024	Nathan Kuenzi	Participate in Arrowood town hall meeting re Guaranty Fund process (1.0);	1.00	\$420.00
10/28/2024	Nathan Kuenzi	Analyze issues regarding Trust Allocation Protocol in connection with Plan and upcoming disclosure statement hearing (.2);	0.20	\$84.00
10/28/2024	Jesse Bair	Review and respond to correspondence with Arrowood re potential resolution of Arrowood's disclosure statement objections (.3);	0.30	\$187.50
10/28/2024	Karin Jonch-Clausen	Identify all key case materials needed for upcoming disclosure statement hearing and prepare hearing preparations binder in connection with same (2.4);	2.40	\$1,008.00

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10/28/2024	Jesse Bair	Review I. Nasatir suggested responses to Arrowood's disclosure statement edits (.2);	0.20	\$125.00
10/28/2024	Brian Cawley	Prepare for Arrowood townhall meeting (.2); participate in same for insurance purposes (1.0);	1.20	\$504.00
10/28/2024	Nathan Kuenzi	Respond to additional state court counsel questions re Arrowood POC instructions and exhibits (.2);	0.20	\$84.00
10/28/2024	Nathan Kuenzi	Review and respond to correspondence with I. Nasatir and T. Burns with analysis of issue raised by state court counsel re Arrowood coverage (.2);	0.20	\$84.00
10/28/2024	Nathan Kuenzi	Participate in conference with T. Burns re Arrowood townhall and presentation in connection with same (.2);	0.20	\$84.00
10/28/2024	Brian Cawley	Continue researching impact of disclaimer and estoppel for coverage defenses under N.Y. law in connection with Arrowood coverage action (1.9);	1.90	\$798.00
10/28/2024	Jesse Bair	Review combined Committee/debtor redline of Arrowood's suggested Plan edits (.3);	0.30	\$187.50
10/28/2024	Jesse Bair	Review the debtor's proposed resolution of outstanding insurance settlement agreement issue (.1); correspond with PSZJ re same (.1);	0.20	\$125.00
10/28/2024	Timothy Burns	Participate in conference with N. Kuenzi re Arrowood town hall meeting (.2); meet with J. Bair re disclosure statement hearing strategy (.2); provide instructions to K. Jonch-Clauen re disclosure statement hearing preparations (.1);	0.50	\$487.50
10/29/2024	Nathan Kuenzi	Correspond with J. Bair re Delaware Liquidation Order (.2);	0.20	\$84.00
10/29/2024	Nathan Kuenzi	Analyze Interstate, LMI, and Evanston settlement agreements and run blackline for J. Bair and B. Michael (.9);	0.90	\$378.00
10/29/2024	Jesse Bair	Participate in Committee meeting for insurance purposes re Plan and settlement agreement status, next-steps, and upcoming disclosure statement hearing (.6);	0.60	\$375.00
10/29/2024	Brian Cawley	Respond to J. Bair request regarding adversary proceeding status and stays in connection with upcoming disclosure statement hearing (.7);	0.70	\$294.00
10/29/2024	Jesse Bair	Correspond with Arrowood re potential resolution of Arrowood's disclosure statement objections (.2);	0.20	\$125.00
10/29/2024	Brian Cawley	Respond to N. Kuenzi request regarding Arrowood claimants and policy periods (.3);	0.30	\$126.00

10/29/2024	Nathan Kuenzi	Review PSZJ comments to proposed motion for clarification and draft revised version of motion implementing same (1.5);	1.50	\$630.00
10/29/2024	Jesse Bair	Participate in meet and confer with the debtor and Committee professionals re ongoing insurance settlement negotiations, potential Plan and Disclosure Statement objections, and strategy for disclosure statement hearing and overall Plan process (1.7);	1.70	\$1,062.50
10/29/2024	Nathan Kuenzi	Analysis re motion practice issues before NY Ancillary Receivership court (.3); correspond with T. Burns re same (.2);	0.50	\$210.00
10/29/2024	Timothy Burns	Review the Committee's plan support letter filing (.1); review and respond to correspondence between Committee professionals re response to state court counsel re Arrowood question (.2); review correspond with the Committee and state court counsel re weekly meeting and upcoming disclosure statement hearing (.1); review and revise draft motion for clarification in Arrowood ancillary and correspond with N. Kuenzi re same (.2); review agenda for disclosure statement hearing (.1); participate in portion of call with Debtor and Committee professionals re preparations and strategy for disclosure statement hearing (1.4);	2.10	\$2,047.50
10/29/2024	Jesse Bair	Review latest settlement agreement edits received from Interstate (.3); correspond with B. Michael re same (.1);	0.40	\$250.00
10/29/2024	Jesse Bair	Review and respond to correspondence with B. Michael and N. Kuenzi re Evanston and Lexington settlement agreements (.1);	0.10	\$62.50
10/29/2024	Nathan Kuenzi	Draft revised Motion for Clarification based on T. Burns edits/revisions (.9); correspond with PSZJ re same (.1);	1.00	\$420.00
10/29/2024	Jesse Bair	Review and respond to state court counsel question re Arrowood liquidation issue (.1);	0.10	\$62.50
10/29/2024	Nathan Kuenzi	Review and analyze modified disclosure statement drafts (.4);	0.40	\$168.00
10/29/2024	Nathan Kuenzi	Draft correspondence to state court counsel responding to particular Arrowood questions (.3);	0.30	\$126.00
10/29/2024	Jesse Bair	Prepare for upcoming disclosure statement hearing, including by reviewing the disclosure statement and Plan (1.7);	1.70	\$1,062.50
10/29/2024	Jesse Bair	Review and respond to correspondence with PSZJ re potential resolution of outstanding insurance settlement agreement issue (.1);	0.10	\$62.50

10/30/2024	Jesse Bair	Continue preparing for disclosure statement hearing, including review of insurance adversary proceeding status summary, overview re Arrowood Guaranty Fund process, and revised version of the disclosure statement filed by the debtor (.7);	0.70	\$437.50
10/30/2024	Jesse Bair	Participate in pre-hearing meet and confer with Arrowood re potential resolution of Arrowood's disclosure statement objections (.3);	0.30	\$187.50
10/30/2024	Jesse Bair	Review additional suggested revision to the insurance settlement agreements from the debtor and correspond with PSZJ re same (.1);	0.10	\$62.50
10/30/2024	Jesse Bair	Review the debtor's disclosure statement hearing demonstrative (.1);	0.10	\$62.50
10/30/2024	Jesse Bair	Review and edit additional proposed Disclosure Statement revisions received from Arrowood (1.2); correspond with Committee professionals re potential resolution of same (.2);	1.40	\$875.00
10/30/2024	Jesse Bair	Participate in Zoom conference with the Debtor and Committee professionals re outcome of disclosure statement hearing and next-steps re revisions to Plan and disclosure statement and finalization of the insurance settlement agreements (.8);	0.80	\$500.00
10/30/2024	Jesse Bair	Participate in disclosure statement hearing for insurance purposes (3.5); participate in post-hearing meeting with the debtor and Committee professionals re outcome of same and next-steps (.2);	3.70	\$2,312.50
10/30/2024	Nathan Kuenzi	Review correspondence from I. Nasatir and T. Burns on Arrowood filing in response to OSC and/or Motion to Clarify and respond with course of action regarding NYLB outreach (.5);	0.50	\$210.00
10/30/2024	Jesse Bair	Review and edit claimant release for insurance purposes (.2);	0.20	\$125.00
10/30/2024	Timothy Burns	Correspond with N. Kuenzi re procedure re Ancillary Receivership clarification motion (.2); participate in disclosure statement hearing (3.5); participate in post-hearing conference with the debtor and Committee professionals re outcome of same and next-steps (.2); participate in call with state court counsel re insurance Plan issues (.1);	4.00	\$3,900.00
10/30/2024	Brenda Horn-Edwards	Draft monthly fee statement (.2); correspond with J. Bair re same (.1);	0.30	\$108.00
10/31/2024	Jesse Bair	Review revised version of the LMI settlement agreement (.3);	0.30	\$187.50

10/31/2024	Jesse Bair	Review and edit revised version of the Evanston settlement agreement (.4);	0.40	\$250.00
10/31/2024	Jesse Bair	Participate in call with B. Michael re ongoing Plan, disclosure statement, and insurance settlement agreement negotiation issues (.2);	0.20	\$125.00
10/31/2024	Jesse Bair	Participate in part 2 of court-ordered meet and confer with the debtor, insurers, and Committee professionals re revisions and finalization of the insurance settlement agreements, disclosure statement, Plan, and various Plan supplements (3.1);	3.10	\$1,937.50
10/31/2024	Jesse Bair	Participate in part 1 of court-ordered meet and confer with the debtor, insurers, and Committee professionals re revisions and finalization of the insurance settlement agreements, disclosure statement, Plan, and various Plan supplements (4.8);	4.80	\$3,000.00
10/31/2024	Timothy Burns	Review and revise most recent version of the disclosure statement (.4);	0.40	\$390.00
10/31/2024	Jesse Bair	Review and edit revised version of the Lexington settlement agreement (.3);	0.30	\$187.50
10/31/2024	Brenda Horn-Edwards	Edit and finalize Burns Bair monthly fee statement and correspond with G. Brown (.1);	0.10	\$36.00
10/31/2024	Jesse Bair	Review Interstate's additional Plan-related insurance edits (.1); correspondence with B. Michael re same (.1);	0.20	\$125.00
10/31/2024	Jesse Bair	Review and respond to correspondence with Arrowood re resolution of remaining Arrowood disclosure statement objections (.1);	0.10	\$62.50
<b>Total Hours and Fees</b>			<b>262.30</b>	<b>\$156,409.50</b>

**EXPENSES**

<b><u>Date</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
10/29/2024	Inflight WiFi, T. Burns	\$15.95
10/29/2024	Delta Airlines, T. Burns (MSN-LGA, Oct. 29-30)	\$1,316.95
10/29/2024	Inflight WiFi, J. Bair	\$15.95
10/29/2024	Taxi, T. Burns and J. Bair	\$104.92
10/29/2024	Travel Meal, J. Bair	\$20.14
10/29/2024	Delta Airlines, J. Bair (MSN-LGA, Oct. 29-30)	\$1,316.95
10/30/2024	Inflight WiFi, T. Burns	\$15.95
10/30/2024	MSN Airport parking, T. Burns	\$16.00
10/30/2024	Travel Meal, J. Bair	\$29.40
10/30/2024	Travel Meal, T. Burns	\$7.27
10/30/2024	Hotel, T. Burns	\$426.51
10/30/2024	Travel Meal, T. Burns and J. Bair	\$82.46
10/30/2024	Hotel, J. Bair	\$426.51

10/30/2024

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MSN Airport parking, J. Bair

\$20.00

**Total Expenses****\$3,814.96****Timekeeper Summary**

<b><u>Name</u></b>	<b><u>Title</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Alexander Castro	Associate	1.80	\$420.00	\$756.00
Brenda Horn-Edwards	Paralegal	0.40	\$360.00	\$144.00
Brian Cawley	Associate	37.30	\$420.00	\$15,666.00
Jesse Bair	Partner	68.40	\$625.00	\$42,750.00
Karin Jonch-Clausen	Associate	2.40	\$420.00	\$1,008.00
Katie Sticklen	Associate	3.80	\$420.00	\$1,596.00
Morgan Stippel	Associate	9.80	\$420.00	\$4,116.00
Nathan Kuenzi	Associate	80.30	\$420.00	\$33,726.00
Timothy Burns	Partner	58.10	\$975.00	\$56,647.50

**Total Due This Invoice: \$160,224.46**