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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

In re

THE ROMAN CATHOLIC BISHOP OF
SACRAMENTO,

Debtor in Possession.

Case No. 24-21326

Chapter 11

DCN: STI-14

Date: March 25, 2026
Time: 11:00 a.m.
Location: Courtroom 35 (Dept. C)
Judge: Hon. Christopher M. Klein

**STINSON LLP'S FEE APPLICATION FOR SERVICES RENDERED
AND EXPENSES INCURRED FOR THE PERIOD OF
DECEMBER 1, 2025 THROUGH JANUARY 31, 2026**

Stinson LLP ("Stinson"), counsel for the Official Committee of Unsecured Creditors in the above-captioned case (the "Committee"), hereby submits this application for compensation of fees

and reimbursement of expenses (the “**Application**”) as lead bankruptcy counsel for the Committee pursuant to 11 U.S.C. §§ 105(a), 328 and 331 for the period of December 1, 2025 through and including January 31, 2026 (the “**Application Period**”). Stinson requests the Court enter an order, substantially in the form attached to the Exhibit List as **Exhibit A** (the “**Proposed Order**”), authorizing the Debtor to pay the compensation and reimbursement from available funds of the estate. In support thereof, Stinson respectfully submits the following:

I. RELIEF REQUESTED

Through this Application, Stinson requests an order authorizing payment to Stinson by The Roman Catholic Bishop of Sacramento, the debtor and debtor in possession in the above-captioned case (the “**Debtor**”), of the unpaid balance of the allowed fees and expenses after application of any retainer and granting such other relief as the Court deems just and proper for the following:

Name of Applicant:	Stinson LLP
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors, as lead bankruptcy counsel
Petition Date:	April 1, 2024
Date of Retention:	April 17, 2024, pursuant to Order dated May 11, 2024 [ECF No. 322]
Period for Which Compensation and Reimbursement is sought:	December 1, 2025 through January 31, 2026
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$177,014.50
Amount of Stinson Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$710.79
Number of Professionals Included in This Application:	10
Number of Professionals Billing Under 15 Hours:	1

II. CASE STATUS

On April 1, 2024, the Debtor initiated this case by filing a voluntary petition for relief under chapter 11 of Title 11 of the U.S. Code. On April 12, 2024, the U.S. Trustee for Region 17 appointed nine unsecured creditors to be members of the Committee pursuant to 11 U.S.C. § 1102(a). On May 11, 2024, the Court entered the *Order Approving Application to Employ Stinson LLP as Counsel to the Official Committee of Unsecured Creditors* [ECF No. 322], effective as of April 17, 2024. Since that date, Stinson and the Committee have continued to collaborate with the Debtor, the Debtor's insurers, the U.S. Trustee and other parties to progress this chapter 11 case.

During the Application Period, Stinson's primary efforts to progress the case include: (a) reviewing the Debtor's document production; (b) working with the Committee's financial advisors to analyze the Debtor's assets; (c) extensive dialogue with counsel for the parishes and the Debtor regarding document production and asset dispositions; (d) reviewing the Debtor's real property sales and working with Debtor's counsel, counsel for the parishes, and the Court to reach agreement on a property sales process and treatment of the sales proceeds; (e) meeting with the Committee and Committee members' individual counsel to discuss claims issues, insurance issues, survivor impact statements, and other aspects of the case; (f) reviewing transfers and analyzing potential avoidance actions; (g) collaborating with Debtor's counsel and insurers to make progress in mediation; and (h) litigating the appeals pending in before the District Court for the Eastern District of California (the "**District Court**"). Notably, Stinson recently filed a response brief on behalf of the Committee in the appeals pending before the District Court in January 2026.

Stinson and the Committee's other professionals also continue to engage in ongoing discussions regarding insurance coverage and claim valuation, including in the context of mediation. Stinson anticipates that these discussions will continue in the coming months and endeavors to work with counsel for the Debtor and other parties in interest to reach a global

1 resolution as soon as possible. A mediation session is currently scheduled for May 2026, and a
2 hearing in the appeal pending before the District Court was held on October 27, 2025.

3 4 III. SERVICES RENDERED AND COSTS INCURRED

5 A. The Itemization of Services Rendered and Disbursements Made by Category

6 The following itemization breaks down the services rendered by Stinson by the service
7 categories indicated and provides an aggregation of disbursements by form of disbursement.

8 1. Services Rendered

9 A listing of the billing task categories showing the number of professional hours expended
10 and fees incurred under each billing task category are shown below:

11 Category	Hours	Fees
12 A. Case Administration (B110)	1.5	\$0.00
13 B. Mediation (B115)	25.3	\$17,156.50
14 C. Asset Analysis & Recovery (B120)	14.5	\$9,189.50
15 D. Relief from Stay Proceedings (B140)	1.5	\$1,035.00
16 E. Meetings and Communications with Creditors (B150)	39.9	\$18,504.50
17 F. Fee/Employment Applications (B160)	19.2	\$6,659.50
18 G. Avoidance Action Analysis (B180)	3.0	\$1,702.50
19 H. Other Contested Matters (B190)	48.1	\$26,792.00
20 I. Real Estate (B250)	5.4	\$3,334.00
21 J. Appeals (B430)	195.6	\$92,641.00
Totals	354.0	\$177,014.50

22 A detailed itemization of the services rendered in each the above service categories is set
23 forth in Stinson's invoice and Task Summary Billing Report, annexed to the Exhibit List as
24 **Exhibit B.**

25 2. Stinson Expense Disbursements Made

26 The expenses incurred during the Application Period are as follows:
27
28

Category	Total
Parcel Quest Access Fees	\$83.32
Relativity Database Charges and License Fees	\$560.00
Shipping Costs	\$67.47
Total	\$710.79

B. The Itemization of Services Rendered by Stinson Timekeepers

The hours spent in this case during the Application Period for which Stinson seeks compensation, the hourly rate for each attorney and paralegal and the resulting fees are as follows:

Professional	Position	Hourly Rate	Hours Billed	Total
Caldie, Edwin H	Partner	690.00	41.3	\$28,497.00
Kugler, Robert T	Partner	690.00	48.5	\$33,465.00
Glasnovich, Andrew J	Partner	620.00	28.5	\$17,670.00
Sevedge, Christopher B	Partner	585.00	6.0	\$3,510.00
Kugler, Logan	Associate	0.00	0.1	\$0.00
Kostolni, Shelby	Associate	445.00	0.1	\$44.50
Veazey, Paul J	Associate	445.00	179.5	\$79,877.50
		0.00	4.8	\$0.00
Parnow, Katie	Associate	420.00	6.9	\$2,898.00
	Law Clerk	420.00	18.5	\$7,770.00
Rehbein, Jessica	Paralegal	325.00	10.1	\$3,282.50
Kennedy, Doug	Paralegal	0.00	8.9	\$0.00
Uren, Zac R	eDiscovery and Practice Support Project Mgr	0.00	0.8	\$0.00
Grand Total			354.0	\$177,014.50

There have been adjustments to the bill. During the Application Period, Stinson did not charge for 14.6 hours of work with a value of \$5,315.50 shown on the bills. The blended hourly rate for all services billed during this period is \$521.55 per hour.

Stinson's billing statements are organized by task, the content of the billings included in

1 each task is generally explained in the *Declaration of Drew Glasnovich* submitted herewith. A true
2 and correct copy of Stinson's invoice and Task Summary Billing Report for the period covered by
3 this Application is attached to the Exhibit List as **Exhibit B**. A true and correct copy of Stinson's
4 Expense Report for the period covered by the application is attached to the Exhibit List as **Exhibit**
5 **C** and is incorporated herein by this reference.

6 Attached to the Exhibit List as **Exhibit D** is a Summary of Customary and Comparable
7 Compensation Disclosures prepared by Stinson describing the blended hourly rates of the various
8 categories of timekeepers that provided services to the Committee during the Application Period.

9 Attached to the Exhibit List as **Exhibit E** is a copy of the "Attorney Fee Budget" agreed
10 upon by and between the Committee and Stinson.

11 This is Stinson's ninth interim fee application. The first interim fee application, *Stinson*
12 *LLP's Fee Application for Services Rendered and Expenses Incurred for the Period of April 17,*
13 *2024 Through May 31, 2024* [ECF No. 451], was filed on July 3, 2024, seeking compensation for
14 \$203,416.50 of fees and reimbursement for \$2,445.62 of expenses. On August 12, 2024, the Court
15 entered the *Order on Motion for Compensation* [ECF No. 604] awarding Stinson interim
16 compensation for \$203,154.00 of fees and interim reimbursement for \$1,975.53 of expenses.

17 The second interim fee application, *Stinson LLP's Fee Application for Services Rendered*
18 *and Expenses Incurred for the Period of June 1, 2024 Through August 31, 2024* [ECF No. 672],
19 was filed on September 18, 2024, seeking compensation for \$283,360.00 of fees and reimbursement
20 for \$3,085.10 of expenses. On October 30, 2024, the Court entered the *Order on Motion for*
21 *Compensation* [ECF No. 829] awarding Stinson interim compensation for \$280,812.25 of fees and
22 reimbursement for \$3,085.10 of expenses.

23 The third interim fee application, *Stinson LLP's Fee Application for Services Rendered and*
24 *Expenses Incurred for the Period of September 1, 2024 Through November 30, 2024* [ECF No.
25 985], was filed on December 18, 2024, seeking compensation for \$265,656.50 of fees and
26 reimbursement for \$3,149.85 of expenses. On February 6, 2025, the Court entered the *Order on*
27 *Motion for Compensation* [ECF No. 1051] awarding Stinson interim compensation for \$254,228.50
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1 of fees and reimbursement for \$3,149.85 of expenses.

2 The fourth interim fee application, *Stinson LLP's Fee Application for Services Rendered*
3 *and Expenses Incurred for the Period of December 1, 2025 through January 31, 2025* [ECF No.
4 1110], was filed on December 18, 2024, seeking compensation for \$196,047.50 of fees and
5 reimbursement for \$1,114.92 of expenses. On March 21, 2025, the Court entered the *Order on*
6 *Motion for Compensation* [ECF No. 1191] awarding Stinson interim compensation for \$189,982.00
7 of fees and reimbursement for \$1,114.92 of expenses.

8 The fifth interim fee application, *Stinson LLP 's Fee Application for Services Rendered and*
9 *Expenses Incurred for the Period of February 1, 2025 through March 31, 2025* [ECF No. 1265],
10 was filed on April 17, 2025, seeking compensation for \$206,843.50 of fees and reimbursement for
11 \$809.98 of expenses. On May 29, 2025, the Court entered the Order on Motion for Compensation
12 [ECF No. 1306] awarding Stinson interim compensation for \$194,052.00 of fees and
13 reimbursement for \$809.98 of expenses.

14 The sixth interim fee application, *Stinson LLP 's Fee Application for Services Rendered and*
15 *Expenses Incurred for the Period of April 1, 2025 through May 31, 2025* [ECF No. 1398], was filed
16 on June 17, 2025, seeking compensation for \$127,127.00 of fees and reimbursement for \$1,121.62
17 of expenses. On July 25, 2025, the Court entered the Order on Motion for Compensation [ECF No.
18 1508] awarding Stinson interim compensation for \$121,756.00 of fees and reimbursement for
19 \$1,121.62 of expenses.

20 The seventh interim fee application, *Stinson LLP 's Fee Application for Services Rendered*
21 *and Expenses Incurred for the Period of June 1, 2025 through August 31, 2025* [ECF No. 1622],
22 was filed on September 10, 2025, seeking compensation for \$275,899.50 of fees and reimbursement
23 for \$1,514.93 of expenses. On October 16, 2025, the Court granted the Order on Motion for
24 Compensation [ECF No. 1673] granting \$275,899.50 in fees and \$1,514.93 in expenses.

25 The eighth interim fee application, *Stinson LLP 's Fee Application for Services Rendered*
26 *and Expenses Incurred for the Period of September 1, 2025 through November 30, 2025* [ECF No.
27 1783] was filed on December 19, 2025, seeking compensation for \$177,958.50 and reimbursement
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1 for \$1,235.74 of expenses. On January 28, 2026, the Court granted the Order on Motion for
2 Compensation [ECF No. 1846], granting \$172,930.00 in fees and \$1,235.74 in expenses.

3 All awarded amounts have been paid subject to refund if a lesser sum is awarded at the time
4 the Court rules on an application for final compensation.

5 **IV. CONCLUSION**

6 Based on all of the above, Stinson respectfully requests this Court to enter the Proposed
7 Order approving on an interim basis the compensation sought and reimbursement of expenses
8 requested as fair, reasonable, and necessary to the estate, and entering an order specifically
9 providing as follows:

10 1. Approving on an interim basis professional fees in the amount of \$177,014.50 and
11 reimbursement of expenses in the amount of \$710.79 for a total of \$177,725.29 for the Application
12 Period of December 1, 2025 through January 31, 2026, as fair, reasonable, and necessary to this
13 case;

14 2. Authorizing the Debtor to pay Stinson the approved fees and costs from available
15 funds of the estate as approved in the cash collateral budget or otherwise; and

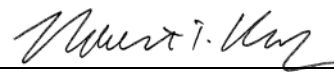
16 3. For such other and further relief as the Court deems just.
17

18 Dated: February 18, 2026

STINSON LLP

19 By:

/s/



Robert T. Kugler

Drew Glasnovich

Counsel for the Official Committee of
Unsecured Creditors