

CAPLIN & DRYSDALE, CHARTERED
 Kevin C. Maclay (admitted *pro hac vice*)
 Todd E. Phillips (admitted *pro hac vice*)
 Jeffrey A. Liesemer (VSB No. 35918)
 Nathaniel R. Miller (admitted *pro hac vice*)
 1200 New Hampshire Avenue, NW, 8th Floor
 Washington, DC 20036
 Telephone: (202) 862-5000

Counsel for the Official Committee of Unsecured Creditors

MORGAN, LEWIS & BOCKIUS LLP
 Brady Edwards (admitted *pro hac vice*)
 1000 Louisiana Street, Suite 4000
 Houston, TX 77002-5006
 Telephone: (713) 890-5000

W. Brad Nes (admitted *pro hac vice*)
 1717 Main Street, Suite 3200
 Dallas, TX 75201-7347
 Telephone: (214) 466-4000

Jeffrey S. Raskin (admitted *pro hac vice*)
 One Market, Spear Street Tower, 28th Floor
 San Francisco, CA 94105-1596
 Telephone: (415) 442-1000

Special Insurance Counsel for the Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF VIRGINIA
 RICHMOND DIVISION**

In re:

 HOPEMAN BROTHERS, INC.,

 Debtor.

Chapter 11

 Case No. 24-32428 (KLP)

**SIXTH MONTHLY FEE STATEMENT OF
 MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL
 INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
 SERVICE RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD OF JANUARY 1, 2025 THROUGH JANUARY 31, 2025**

Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Time Period Covered:	January 1, 2025 through January 31, 2025
Total Fees Requested:	\$116,176.40 (80% of \$145,220.50)
Total Expenses Requested:	\$7,967.86



Type of Fee Statement:	Monthly ¹
------------------------	----------------------

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the “**Local Rules**”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief*, entered September 9, 2024 [Docket No. 162] (the “**Interim Compensation Order**”), Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) for the reasonable and necessary legal services rendered by Morgan Lewis for the period January 1, 2025 through January 31, 2025 (the “**Fee Period**”) and reimbursement of the actual and necessary expenses that Morgan Lewis incurred during the Fee Period. By this Monthly Fee Statement, Morgan Lewis seeks payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$124,144.26, consisting of (i) \$116,176.40, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$7,967.86 for actual and necessary costs and expenses.

Itemization of Services Rendered and Disbursement Incurred

1. In support of this Monthly Fee Statement, Morgan Lewis has attached the following:
 - a. **Exhibit A** is a summary of schedule of hours and fees covered by this Monthly Fee Statement, categorized by project code.

¹ Notice of this Monthly Fee Statement shall be served in accordance with the Interim Compensation Order (as defined herein) and objections to payment of the amounts set forth in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.

- b. **Exhibit B** is a summary schedule of the time expended by all Morgan Lewis professionals and paraprofessionals engaged in the representation of the Committee during the Fee Period.
- c. **Exhibit C** is a summary of the expenses incurred by Morgan Lewis during the Fee Period.
- d. **Exhibit D** includes detailed invoices for the hours expended and fees incurred by Morgan Lewis professionals and paraprofessionals during the Fee Period.

Representations

2. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Morgan Lewis reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee statements and applications will be filed in accordance with the Bankruptcy Code, Bankruptcy Rules, Local Rules, and Interim Compensation Order.

Notice

3. Notice of this Monthly Fee Statement has been provided to all necessary parties in accordance with the Interim Compensation Order.

[Remainder of page left blank]

WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$124,392.26, consisting of (i) \$116,424.40, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$7,967.86 for actual and necessary costs and expenses.

Dated: February 21, 2025

By: /s/ Brady Edwards
Brady Edwards
MORGAN, LEWIS & BOCKIUS LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5006
Telephone: (713) 890-5000
Email: brady.edwards@morganlewis.com

ELECTRONICALLY FILED BY:

/s/ Jeffrey A. Liesemer
CAPLIN & DRYSDALE, CHARTERED
Jeffrey A. Liesemer (VSB No. 35918)
1200 New Hampshire Avenue, NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000
Email: jliesemer@capdale.com

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

Task Code	Matter Description	Hours	Fees Requested
00	General	23.70	\$30,753.00
04	Case Administration & Calendar Control	1.20	\$1,320.00
07	Fee Application – Self	10.60	\$10,905.00
08	Objections – Fee/Retention Applications	0.90	\$1,175.00
10	Litigation	53.60	\$84,060.00
16	Non-Working Travel ¹	9.90	\$17,007.50
<u>TOTAL</u>		<u>99.90</u>	<u>\$145,220.50</u>

¹ 50% rate applied where time is charged for non-working travel.

EXHIBIT B

Professionals Rendering Services During the Fee Period

The Morgan Lewis attorneys who rendered professional services in this chapter 11 case during the Fee Period include:

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S.	Partner	1995	Litigation	\$1,375.00	37.40	\$51,425.00
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	19.50	\$39,487.50
Nes, W. Brad	Partner	2005	Litigation	\$1,450.00	1.20	\$1,740.00
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	24.30	\$37,665.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	2.50	\$2,125.00
Gonzales, Rachael	Associate	2022	Finance	\$850.00	1.40	\$1,190.00
Shim, David	Associate	2016	Finance	\$1,100.00	7.80	\$8,580.00
				Total	94.30	\$142,212.50

The Morgan Lewis paraprofessionals who rendered professional services in this chapter 11 case during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Guzzi, Tiffany A.	Paralegal	Litigation	\$520.00	5.60	\$2,912.00
Weiss, Simone F.	Paralegal	Litigation	\$480.00	0.20	\$96.00
			Total	5.80	\$3,008.00

EXHIBIT C

Summary of Expenses Incurred During the Fee Period

Type	Expenses
Air Travel	\$2,012.78
Business Meals	\$93.02
Data Services – R	\$1,740.80
Hotel	\$1,663.97
Taxi	\$543.04
User Fees (Monthly) – Relativity	\$1,520.00
Legal Research	\$394.25
<u>Total</u>	\$7,967.86

EXHIBIT D

Invoices

Morgan Lewis

Morgan, Lewis & Bockius LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5005
T +1.713.890.5000
F +1.713.890.5001
www.morganlewis.com
Fed Tax ID: 23-0891050

Invoice Date: February 14, 2025
Invoice No. 5608788
Account No. 139505-0001

Hopeman Brothers, Inc.
c/o Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Attn: Tyler P. Brown and Henry P. (Toby) Long, III
Richmond, VA 23219

Summary of Services for the period ended January 31, 2025:

Re: Hopeman Creditors Committee

Fees	\$	145,220.50
Disbursements	\$	7,967.86
Total Current Period Charges	\$	153,188.36

Please refer to the table titled "**Detail of Outstanding Invoices**" which lists all other outstanding invoices for the matters referenced on this invoice.

Morgan Lewis

Morgan, Lewis & Bockius LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5005
T +1.713.890.5000
F +1.713.890.5001
www.morganlewis.com
Fed Tax ID: 23-0891050

Invoice Date: February 14, 2025
Invoice No. 5608788
Account No. 139505-0001

REMITTANCE COPY

Hopeman Brothers, Inc.
c/o Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Attn: Tyler P. Brown and Henry P. (Toby) Long, III
Richmond, VA 23219

Summary of Services for the period ended January 31, 2025:

Re: Hopeman Creditors Committee

Fees	\$	145,220.50
Disbursements	\$	7,967.86
Total Current Period Charges	\$	153,188.36

Please reference account and/or invoice number(s) on your remittance.

<p>Please send your remittance to: Morgan, Lewis & Bockius LLP P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050</p>	<p>Or please wire your remittance to: Wells Fargo Bank, N.A. ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S</p>	<p>For ACH transfers: ABA# 031000503 Acct# 2100010985563 Reference account number</p> <p>Remittance detail address cashapplication@morganlewis.com</p>
---	---	--

Morgan Lewis

Morgan, Lewis & Bockius LLP
 1000 Louisiana Street, Suite 4000
 Houston, TX 77002-5005
 T +1.713.890.5000
 F +1.713.890.5001
 www.morganlewis.com
 Fed Tax ID: 23-0891050

Detail of Outstanding Invoices

The following table shows all other outstanding invoices for the matters being billed on this invoice.

Invoice Date	Invoice Number	Invoice Amount	Payments/Credits	Days Outstanding	Balance Due
10/18/24	5530494	238,023.66	1,700.00	119	236,323.66
11/15/24	5552180	309,570.64	1,700.00	91	307,870.64
12/13/24	5570374	438,370.93	1,700.00	63	436,670.93
01/10/25	5588017	84,074.65	0.00	35	84,074.65
TOTAL OUTSTANDING					\$ 1,064,939.88

Please reference account and/or invoice number(s) on your remittance.

Please send your remittance to: Morgan, Lewis & Bockius LLP P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050	Or please wire your remittance to: Wells Fargo Bank, N.A. ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S	For ACH transfers: ABA# 031000503 Acct# 2100010985563 Reference account number Remittance detail address cashapplication@morganlewis.com
--	---	---

Morgan Lewis

February 14, 2025
Page 1

Invoice No. 5608788
Account No. 139505-0001

Detail for Fee Services Rendered

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/02/25	10	Litigation	Analyze HII motions and email to Caplin and MLB teams regarding mediation.	Cox, D.S.	1,375.00	0.60	825.00
01/02/25	00	General	Evaluate case pleadings and information regarding settlement with insurers.	Guzzi, T. A.	520.00	0.60	312.00
01/02/25	00	General	Analyze and comment on HII's motion to stay pending appeal.	Raskin, J. S.	1,550.00	0.70	1,085.00
01/03/25	10	Litigation	Analyze December 16th transcript, videoconference with Caplin team regarding mediation and email to T. Branham and L. Busch regarding same.	Cox, D.S.	1,375.00	2.60	3,575.00
01/03/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
01/03/25	10	Litigation	Confer with ML team and Caplin team regarding mediation.	Nes, W. B.	1,450.00	0.40	580.00
01/03/25	00	General	Conference with Committee's counsel concerning mediation issues.	Raskin, J. S.	1,550.00	0.40	620.00
01/06/25	10	Litigation	Prepare for and participate in videoconferences with Debtor counsel and Judge Huennekens regarding mediation and confer with MLB team regarding same.	Cox, D.S.	1,375.00	3.50	4,812.50
01/06/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00

Morgan Lewis

February 14, 2025
Page 2

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/06/25	00	General	Conference with Hopeman's counsel concerning mediation (0.5); conference with Committee counsel concerning mediation (0.3); conference with mediator and others concerning mediation (0.5).	Raskin, J. S.	1,550.00	1.30	2,015.00
01/06/25	04	Case Administration & Calendar Control	Review the chapter 11 docket of Hopeman (.1).	Shim, D. K.	1,100.00	0.10	110.00
01/07/25	10	Litigation	Prepare for and attend committee meeting.	Edwards, B.	2,025.00	0.50	1,012.50
01/07/25	00	General	Evaluate case pleadings and notice of hearing.	Guzzi, T. A.	520.00	0.50	260.00
01/08/25	10	Litigation	Prepare correspondence to B. Edwards and J. Raskin regarding mediation strategy.	Cox, D.S.	1,375.00	0.40	550.00
01/08/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
01/09/25	10	Litigation	Analyze mediation issues and prepare for conference with Caplin team.	Cox, D.S.	1,375.00	0.90	1,237.50
01/09/25	07	Fee Applications - Self	Review the invoice for the monthly fee statement.	Gonzales, R.	850.00	1.00	850.00
01/09/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
01/09/25	00	General	Evaluate historic settlement documentation in preparation for mediation.	Guzzi, T. A.	520.00	0.70	364.00
01/09/25	00	General	Analyze and comment on potential mediation demand based on prior expert work on the value of the Chubb policies.	Raskin, J. S.	1,550.00	2.00	3,100.00

Morgan Lewis

February 14, 2025
Page 3

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/10/25	10	Litigation	Confer with B. Edwards regarding mediation strategy (.3) and prepare for and conduct videoconference with MLB and Caplin teams regarding same (1.0).	Cox, D.S.	1,375.00	1.30	1,787.50
01/10/25	10	Litigation	Attend video conference to formulate settlement demand for upcoming mediation, including telephone conferences with committee members' counsel.	Edwards, B.	2,025.00	1.10	2,227.50
01/10/25	07	Fee Applications - Self	Correspondence with ML working group regarding fee application.	Gonzales, R.	850.00	0.40	340.00
01/10/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
01/10/25	10	Litigation	Attend call with MLB and Caplin teams regarding mediation strategy.	Nes, W. B.	1,450.00	0.30	435.00
01/10/25	00	General	Conference concerning mediation issues.	Raskin, J. S.	1,550.00	0.70	1,085.00
01/10/25	04	Case Administration & Calendar Control	Review chapter 11 docket (.1).	Shim, D. K.	1,100.00	0.10	110.00
01/10/25	07	Fee Applications - Self	Confer with MLB working group regarding second interim fee application (.3); review the compensation procedures order and the monthly fee statements in preparation for the second interim fee application (.3).	Shim, D. K.	1,100.00	0.60	660.00
01/11/25	07	Fee Applications - Self	Analyze and revise fee application.	Cox, D.S.	1,375.00	0.30	412.50
01/11/25	07	Fee Applications - Self	Analyze data for second interim fee application (.4).	Shim, D. K.	1,100.00	0.40	440.00

Morgan Lewis

February 14, 2025
Page 4

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/11/25	07	Fee Applications - Self	Correspondence with MLB working group regarding second interim fee application (.3).	Shim, D. K.	1,100.00	0.30	330.00
01/11/25	07	Fee Applications - Self	Revise second interim fee application, proposed order, and exhibits (1.3).	Shim, D. K.	1,100.00	1.30	1,430.00
01/11/25	07	Fee Applications - Self	Analyze draft second interim fee application and exhibits (.2).	Shim, D. K.	1,100.00	0.20	220.00
01/11/25	07	Fee Applications - Self	Analyze monthly fee statements for the second interim fee period (.3).	Shim, D. K.	1,100.00	0.30	330.00
01/12/25	10	Litigation	Analyze draft mediation statement.	Nes, W. B.	1,450.00	0.50	725.00
01/13/25	10	Litigation	Analyze and revise mediation brief.	Cox, D.S.	1,375.00	1.80	2,475.00
01/13/25	08	Objections - Fee/Retention Applications	Work on revised fee application.	Edwards, B.	2,025.00	0.20	405.00
01/13/25	10	Litigation	Prepare for upcoming mediation.	Edwards, B.	2,025.00	0.90	1,822.50
01/13/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
01/13/25	00	General	Prepare revisions and additions to mediation statement.	Raskin, J. S.	1,550.00	2.50	3,875.00
01/13/25	07	Fee Applications - Self	Correspond with MLB working group and Caplin regarding MLB's second interim fee application and exhibits (.8); revise MLB's second interim fee application and exhibits (.4).	Shim, D. K.	1,100.00	1.20	1,320.00
01/14/25	10	Litigation	Analyze and revise Hopeman mediation brief and exchange correspondence with N. Miller regarding same.	Cox, D.S.	1,375.00	2.80	3,850.00

Morgan Lewis

February 14, 2025
Page 5

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/14/25	10	Litigation	Prepare for and conduct telephone conferences with counsel for committee members: T. Branham (Dean Omar) and L. Busch (Simmons).	Edwards, B.	2,025.00	0.40	810.00
01/14/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.50	260.00
01/14/25	00	General	Conference concerning mediation and other settlement issues.	Raskin, J. S.	1,550.00	0.50	775.00
01/14/25	00	General	Analyze and comment on impairments of Hopeman's London and Travelers' coverage.	Raskin, J. S.	1,550.00	1.30	2,015.00
01/14/25	00	General	Communications with the Committee's counsel concerning mediation statement.	Raskin, J. S.	1,550.00	0.50	775.00
01/14/25	07	Fee Applications - Self	Correspond with Caplin regarding MLB's second interim fee application and exhibits (.1); revise MLB's second interim fee application and exhibits based on correspondence with Caplin for filing with the court (.2).	Shim, D. K.	1,100.00	0.30	330.00
01/15/25	10	Litigation	Revise mediation brief and exchange correspondence with N. Miller regarding same.	Cox, D.S.	1,375.00	0.60	825.00
01/15/25	10	Litigation	Prepare for mediation.	Edwards, B.	2,025.00	0.30	607.50
01/15/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
01/15/25	07	Fee Applications - Self	Correspond with MLB working group regarding December monthly fee statement (.1); correspond with MLB working group regarding the as-filed version of MLB's second interim fee application (.1).	Shim, D. K.	1,100.00	0.20	220.00

Morgan Lewis

February 14, 2025
Page 6

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/16/25	10	Litigation	Prepare for meeting with mediator.	Cox, D.S.	1,375.00	1.30	1,787.50
01/16/25	10	Litigation	Analyze mediation materials.in preparation for upcoming mediation.	Edwards, B.	2,025.00	0.90	1,822.50
01/16/25	00	General	Communication with insurance expert concerning the Mermelstein report submitted by Chubb.	Raskin, J. S.	1,550.00	0.50	775.00
01/17/25	07	Fee Applications - Self	Confer with D. Shim and B. Edwards regarding finalization of fee application.	Cox, D.S.	1,375.00	0.30	412.50
01/17/25	10	Litigation	Video conference with M. Clark and Caplin team regarding case status and prepare for mediation.	Cox, D.S.	1,375.00	1.20	1,650.00
01/17/25	07	Fee Applications - Self	Correspond with MLB working group regarding December monthly fee statement (.2); review and revise December monthly fee statement (.1); finalize December monthly fee statement and correspond with committee's counsel regarding the same (.2).	Shim, D. K.	1,100.00	0.50	550.00
01/20/25	10	Litigation	Prepare for and attend meeting with mediator in anticipation of mediation.	Cox, D.S.	1,375.00	1.60	2,200.00
01/20/25	16	Travel	Travel from Houston to Washington DC for upcoming mediation (due to blizzard). (4 hrs total travel time - billed at half-time for non-working travel).	Edwards, B.	2,025.00	2.00	4,050.00
01/20/25	10	Litigation	Prepare for and conduct introductory video conference with court-appointed mediator.	Edwards, B.	2,025.00	0.80	1,620.00

Morgan Lewis

February 14, 2025
Page 7

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/21/25	10	Litigation	Prepare for mediation and email to J. Raskin and B. Edwards regarding same.	Cox, D.S.	1,375.00	3.00	4,125.00
01/21/25	10	Litigation	Meet with Caplin team to prepare for upcoming mediation.	Edwards, B.	2,025.00	1.20	2,430.00
01/21/25	10	Litigation	Prepare for mediation.	Edwards, B.	2,025.00	1.80	3,645.00
01/21/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
01/21/25	16	Travel	Travel to Richmond, VA for mediation with debtor and Chubb. (7.5 hrs total travel time - billed at half-time for non-working travel).	Raskin, J. S.	1,550.00	3.70	5,735.00
01/21/25	00	General	Discuss mediation strategy with Committee's lawyers.	Raskin, J. S.	1,550.00	1.20	1,860.00
01/21/25	07	Fee Applications - Self	Revise the draft December monthly fee statement based on correspondence with the Committee's counsel and MLB working group (.3).	Shim, D. K.	1,100.00	0.30	330.00
01/22/25	10	Litigation	Prepare for and attend mediation.	Cox, D.S.	1,375.00	4.30	5,912.50
01/22/25	10	Litigation	Attend mediation with Judge Huennekens and attend to post-mediation issues.	Edwards, B.	2,025.00	6.40	12,960.00
01/22/25	16	Travel	Return travel from mediation (Richmond to Charlotte due to weather). (3 hrs total travel time - billed at half-time for non-working travel).	Edwards, B.	2,025.00	1.50	3,037.50
01/22/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.40	208.00
01/22/25	00	General	Internal communications concerning mediation with Debtor and Chubb.	Raskin, J. S.	1,550.00	0.80	1,240.00

Morgan Lewis

February 14, 2025
Page 8

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/22/25	16	Travel	Travel from Richmond, VA for mediation with Debtor and Chubb. (5.5 hrs total travel time - billed at half-time for non-working travel).	Raskin, J. S.	1,550.00	2.70	4,185.00
01/22/25	00	General	Attend mediation with Debtor and Chubb.	Raskin, J. S.	1,550.00	4.00	6,200.00
01/22/25	07	Fee Applications - Self	Correspond with U.S. Trustee regarding LEDES files (.1); correspond with MLB working group regarding LEDES files (.2).	Shim, D. K.	1,100.00	0.30	330.00
01/23/25	10	Litigation	Analyze Chubb coverage and settlements for mediation.	Cox, D.S.	1,375.00	2.50	3,437.50
01/23/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.40	208.00
01/24/25	10	Litigation	Analyze mediation issues and post mediation strategy.	Cox, D.S.	1,375.00	1.50	2,062.50
01/24/25	07	Fee Applications - Self	Review internal correspondence regarding fee applications.	DeSantis, C. M.	850.00	0.30	255.00
01/24/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
01/24/25	08	Objections - Fee/Retention Applications	Correspond with MLB working group and the U.S. Trustee regarding MLB's second interim fee application.	Shim, D. K.	1,100.00	0.30	330.00
01/24/25	04	Case Administration & Calendar Control	Correspond with C. DeSantis regarding next steps.	Shim, D. K.	1,100.00	0.50	550.00
01/26/25	10	Litigation	Analyze proposed term sheet and correspondence to Caplin team regarding same.	Cox, D.S.	1,375.00	2.00	2,750.00

Morgan Lewis

February 14, 2025
Page 9

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/27/25	10	Litigation	Analyze proposed term sheet and video conference with Caplin team regarding same.	Cox, D.S.	1,375.00	3.20	4,400.00
01/27/25	00	General	Conference with Committee counsel concerning 524(g) term sheet.	Raskin, J. S.	1,550.00	0.50	775.00
01/27/25	00	General	Circulate recent filings to team.	Weiss, S. F.	480.00	0.20	96.00
01/28/25	10	Litigation	Prepare for and attend committee meeting.	Edwards, B.	2,025.00	0.40	810.00
01/28/25	00	General	Attend weekly Committee meeting.	Raskin, J. S.	1,550.00	0.50	775.00
01/28/25	08	Objections - Fee/Retention Applications	Correspond with Committee's counsel and MLB working group regarding tax forms (.1); correspond with U.S. Trustee regarding MLB second interim fee application (.1).	Shim, D. K.	1,100.00	0.20	220.00
01/29/25	07	Fee Applications - Self	Exchange correspondence with D. Shim regarding fee application.	Cox, D.S.	1,375.00	0.20	275.00
01/29/25	10	Litigation	Analyze revisions to 524g term sheet and analyze Chubb coverage issues.	Cox, D.S.	1,375.00	1.20	1,650.00
01/29/25	07	Fee Applications - Self	Telephone conference with D. Shim regarding order granting second interim fee application.	DeSantis, C. M.	850.00	0.20	170.00
01/29/25	07	Fee Applications - Self	Revise proposed order granting second interim fee application (.6); internal correspondence regarding same and correspondence with UST regarding same (.6).	DeSantis, C. M.	850.00	1.20	1,020.00

Morgan Lewis

February 14, 2025
Page 10

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/29/25	10	Litigation	Work with David Cox to formulate strategy for next steps in ongoing mediation with Judge Huenekens.	Edwards, B.	2,025.00	0.30	607.50
01/29/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
01/29/25	00	General	Communications concerning 524(g) term sheet in connection with mediation.	Raskin, J. S.	1,550.00	0.50	775.00
01/29/25	04	Case Administration & Calendar Control	Correspond with MLB working group regarding case administration.	Shim, D. K.	1,100.00	0.50	550.00
01/29/25	08	Objections - Fee/Retention Applications	Correspond with C. DeSantis regarding U.S. Trustee's comments on MLB second interim fee application.	Shim, D. K.	1,100.00	0.10	110.00
01/30/25	10	Litigation	Confer with B. Edwards regarding mediation strategy.	Cox, D.S.	1,375.00	0.30	412.50
01/30/25	10	Litigation	Prepare for and conduct telephonic conference with mediator regarding settlement issues and related follow-up items.	Edwards, B.	2,025.00	0.80	1,620.00
01/30/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
01/31/25	07	Fee Applications - Self	Review sample fee application orders and revise Hopeman fee application to incorporate UST signature (.6); internal correspondence regarding same (.1); correspondence with UCC counsel regarding same (.1).	DeSantis, C. M.	850.00	0.80	680.00

Morgan Lewis

February 14, 2025
Page 11

Invoice No. 5608788
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
01/31/25	08	Objections - Fee/Retention Applications	Correspond with C. DeSantis regarding MLB's revised proposed order for second interim fee application.	Shim, D. K.	1,100.00	0.10	110.00
Matter Total						99.90	\$ 145,220.50

Morgan Lewis

February 14, 2025
Page 12

Invoice No. 5608788
Account No. 139505-0001

Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	37.40	1,375.00	51,425.00
Edwards, B.	19.50	2,025.00	39,487.50
Nes, W. B.	1.20	1,450.00	1,740.00
Raskin, J. S.	24.30	1,550.00	37,665.00
ASSOCIATE			
DeSantis, C. M.	2.50	850.00	2,125.00
Gonzales, R.	1.40	850.00	1,190.00
Shim, D. K.	7.80	1,100.00	8,580.00
PARALEGAL			
Guzzi, T. A.	5.60	520.00	2,912.00
Weiss, S. F.	0.20	480.00	96.00
Matter Total		99.90	\$ 145,220.50

Morgan Lewis

February 14, 2025
Page 13

Invoice No. 5608788
Account No. 139505-0001

Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
11/12/24	Cox, David S	Hotel - David S. Cox - for D. Cox while in Arizona for the Lascell Deposition.	628.77
11/12/24	Cox, David S	Taxi - David S. Cox - Transportation to the hotel from the airport for D. Cox while in Arizona for the Lascell Deposition.	35.22
11/13/24	Cox, David S	Taxi - David S. Cox - Transportation to Airport from the hotel for D. Cox while in Arizona for the Lascell Deposition.	38.24
12/15/24	Raskin, Jeffrey S	Air - JEFF RASKIN - line Bag Fee	40.00
12/15/24	Raskin, Jeffrey S	Business Meals - JEFF RASKIN - Breakfast and Lunch (2).	73.16
12/15/24	Raskin, Jeffrey S	Hotel - JEFF RASKIN - (Please note the gift shop expense of \$5.00 is for water.)	565.43
12/15/24	Raskin, Jeffrey S	Taxi - JEFF RASKIN - Lyft expenses.	224.94
01/17/25	Edwards, Brady	Air EAZAPQ : 016 7173156002 : 2025-01-21 - 2025-01-21 : EDWARDS/BRADY SHERROD-->IAHORDRIC : Billable	1,702.79
01/17/25	Raskin, Jeffrey S	Air JYLNZJ : 4465703268 : 2025-01-21 - 2025-01-21 : RASKIN/JEFFREY-->SFOIAD : Billable	189.99
01/21/25	Raskin, Jeffrey S	Business Meals - JEFF RASKIN - Lunch	19.86
01/21/25	Raskin, Jeffrey S	Taxi - JEFF RASKIN - Lyft	94.64
01/21/25	Raskin, Jeffrey S	Hotel - JEFF RASKIN -	469.77
01/21/25	Raskin, Jeffrey S	Taxi - JEFF RASKIN - There are two marked "Driver Gratuity." I needed to take car service from Dulles to Richmond and back. The travel agent did not know whether gratuities were included in their inauguration week high rates. The drivers said "no." I do not carry much cash, so I made paypal transfers to both. The screen shots are from my checking account online.	150.00
01/21/25	Raskin, Jeffrey S	Air - JEFF RASKIN - Bag Fees	80.00
01/22/25	Raskin, Jeffrey S	WestLaw	118.25
01/28/25	Raskin, Jeffrey S	WestLaw	276.00
01/31/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; January; 16.00 User	1,520.00
01/31/25	Data Services, Data Services	Data Services Active - R fee; January; 87.04 GB	1,740.80
Total Disbursements			\$ 7,967.86

Morgan Lewis

February 14, 2025
Page 14

Invoice No. 5608788
Account No. 139505-0001

Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Taxi	543.04
Hotel	1,663.97
Air	120.00
Air	1,892.78
Business Meals	93.02
Westlaw Charges	394.25
Data Services Active - R	1,740.80
User Fees (Monthly) - Relativity	1,520.00
<hr/>	
Total Disbursements	\$ 7,967.86
<hr/> <hr/>	