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*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.
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Chapter 11  
  
 Case No. 24-32428 (KLP)

**SUMMARY COVER SHEET TO THE THIRD INTERIM FEE APPLICATION  
 OF MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL TO  
 THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE INTERIM PERIOD OF DECEMBER 1, 2024 THROUGH FEBRUARY 28, 2025**

<b>Basic Information</b>	
Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Petition Date:	June 30, 2024 (the " <b>Petition Date</b> ")
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
<b>Third Interim Fee Application</b>	
Third Interim Period:	December 1, 2024 through February 28, 2025
Total Hours Billed:	213.10
Total Fees Requested:	\$297,566.00



636	February 1, 2025 through February 28, 2025	\$74,080.00 (80% of \$92,600.00)	\$10,723.58	\$0.00	\$0.00
	<b>Total</b>	\$238,052.80 (80% of \$297,566.00)	\$43,020.59	\$0.00	\$0.00

**PRIOR INTERIM FEE ORDER(S):**

Docket No.	Period Covered	Requested		Allowed on Interim Basis	
		Fees	Expenses	Fees Allowed	Expenses Allowed
357	July 29, 2024 through August 31, 2024	\$230,210.00	\$90.00	\$230,210.00	\$90.00
558	September 1, 2024 through November 30, 2024	\$958,844.00	\$27,121.23	\$953,744.00 <sup>1</sup>	\$27,121.23

**SUMMARY OF PROFESSIONALS RENDERING SERVICES FOR THE THIRD INTERIM PERIOD:**

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S	Partner	1995	Litigation	\$1,375.00 (2025)	65.20	\$89,650.00
Cox, David S	Partner	1995	Litigation	\$1,265.00 (2024)	11.10	\$14,041.50
Edwards, Brady	Partner	1995	Litigation	\$2,025.00 (2025)	27.30	\$55,282.50
Edwards, Brady	Partner	1995	Litigation	\$1,860.00 (2024)	5.70	\$10,602.00
Nes, W. Brad	Partner	2005	Litigation	\$1,450.00 (2025)	1.20	\$1,740.00
Nes, W. Brad	Partner	2005	Litigation	\$1,330.00 (2024)	0.60	\$798.00
Raskin, Jeffrey S	Partner	1993	Litigation	\$1,550.00 (2025)	45.10	\$69,905.00
Raskin, Jeffrey S	Partner	1993	Litigation	\$1,430.00 (2024)	17.20	\$24,596.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00 (2025)	7.70	\$6,545.00
DeSantis, Celine M.	Associate	2022	Finance	\$710.00 (2024)	0.00	\$0.00
Shim, David K.	Associate	2016	Finance	\$1,100.00 (2025)	8.60	\$9,460.00
Shim, David K.	Associate	2016	Finance	\$985.00 (2024)	1.60	\$1,576.00
Gonzales, Rachael	Associate	2022	Finance	\$850.00 (2025)	1.40	\$1,190.00
Gonzales, Rachael	Associate	2022	Finance	\$710.00 (2024)	8.90	\$6,319.00
				<b>Total</b>	<b>201.60</b>	<b>\$291,705.00</b>
Non-legal Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Guzzi, Tiffany	Sr. Paralegal	N/A	Litigation	\$520.00	7.60	\$3,952.00
Guzzi, Tiffany	Sr. Paralegal	N/A	Litigation	\$490.00 (2024)	3.70	\$1,813.00
Weiss, Simone F.	Sr. Paralegal	N/A	Litigation	\$480.00	0.20	\$96.00
Weiss, Simone F.	Sr. Paralegal	N/A	Litigation	\$455.00	0.00	\$0.00
				<b>Total</b>	<b>11.50</b>	<b>\$5,861.00</b>
				<b>Aggregate Total</b>	<b>213.10</b>	<b>\$297,566.00</b>

<sup>1</sup> 953,744.00 includes a \$5,100 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Second Interim Fee Application.

<b>Blended Rate for Attorneys:</b>			<b>\$1,446.95</b>
<b>Blended Rate for All Timekeepers:</b>			<b>\$1,396.37</b>

**SUMMARY OF FEES BY PROJECT CATEGORY  
DURING THE THIRD INTERIM PERIOD:**

<b>Task Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
00	General	46.60	\$58,202.00
04	Case Administration & Calendar Control	1.30	\$1,430.00
07	Fee Applications - Self	27.00	\$24,039.50
08	Objections - Fee/Retention Applications	1.60	\$2,249.00
10	Litigation	125.90	\$193,538.00
15	Committee Meetings/Conferences	0.80	\$1,100.00
16	Non-Working Travel <sup>2</sup>	9.90	\$17,007.50
<b>TOTAL</b>		213.10	<b>\$297,566.00</b>

**SUMMARY OF EXPENSES INCURRED  
DURING THE THIRD INTERIM PERIOD:**

<b>Type</b>	<b>Expenses</b>
Legal Research	\$5,603.75
Court Reporter	\$10,280.63
Taxi	\$563.04
Travel – Airfare	\$5,968.80
Hotel	\$2,174.77
Business Meals	\$93.02
Court Transcripts	\$237.00
Litigation Support Vendor Charges	\$5,134.18
Videographers	\$2,595.00
Data Services	\$20.00
Data Services Active	\$5,220.40
User Fees (Monthly) - Relativity	\$5,130.00
<b>Total</b>	<b>\$43,020.59</b>

<sup>2</sup> 50% rate applied where time is charged for non-working travel.

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**THIRD INTERIM FEE APPLICATION OF  
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE INTERIM PERIOD OF DECEMBER 1, 2024 THROUGH FEBRUARY 28, 2025**

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**”), submits this third interim fee application (the “**Fee Application**”) for allowance of compensation for professional services provided in the amount of \$297,566.00 and reimbursement of actual and necessary expenses in the amount of \$43,020.59 incurred during the interim period

from December 1, 2024 through February 28, 2025 (the “**Third Interim Period**”). In support of this Fee Application, Morgan Lewis respectfully states as follows:

### **Jurisdiction and Venue**

1. The United States Bankruptcy Court for the Eastern District of Virginia (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference from the United States District Court for the Eastern District of Virginia*, dated August 15, 1984. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The Committee confirms its consent to the entry of a final order by the Court in connection with this Fee Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are 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 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**”).

### **Background**

4. On June 30, 2024, the Debtor filed a petition for relief under Chapter 11 of the Bankruptcy Code, commencing the above-captioned chapter 11 case (the “**Chapter 11 Case**”).

The largest creditor constituency in the Chapter 11 Case consists of holders of claims for personal injury or wrongful death arising from exposure to asbestos.

5. On July 22, 2024, the Office of the United States Trustee for Region 4 (the “**U.S. Trustee**”) notified the Court that, pursuant to 11 U.S.C. § 1102, it had appointed the Committee [Docket No. 69]. All of the Committee’s members hold unsecured claims against the Debtor resulting from exposure to asbestos.

6. On August 28, 2024, the Committee filed an application to retain Morgan Lewis as its special insurance counsel, effective *nunc pro tunc* to July 29, 2024, pursuant to sections 327(e), 328, and 1103(a) of the Bankruptcy Code (the “**Retention Application**”) [Docket No. 124]. The Court approved the Retention Application on October 4, 2024 (the “**Retention Order**”) [Docket No. 269]. A copy of the Retention Order is attached as **Exhibit A**.

7. Pursuant to the Retention Order and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* (the “**Interim Compensation Order**”) [Docket No. 162], Morgan Lewis filed its first interim fee application seeking allowance of compensation for professional services in the amount of \$230,210.00 and reimbursement of actual and necessary expenses in the amount of \$90.00 for the period from July 29, 2024 to August 31, 2024 (the “**First Interim Fee Application**”) [Docket No. 302]. On November 13, 2024, the Court approved the First Interim Fee Application, allowing the full amounts sought on an interim basis.

8. Additionally, on January 14, 2024, Morgan Lewis filed its second interim fee application seeking allowance and compensation for professional services in the amount of \$958,844.00 and reimbursement of actual and necessary expenses in the amount of \$27,121.23 for the period from September 1, 2024 to November 30, 2024 (the “**Second Interim Fee Application**”)

[Docket No. 495]. On February 13, 2025, the Court approved the Second Interim Fee Application, allowing compensation for professional services rendered and reimbursement for expenses incurred in the aggregate amount of \$980,865.23.<sup>3</sup>

9. Morgan Lewis has received payment of the amounts approved by the Court in connection with the First Interim Fee Application and it is awaiting payments for the amounts approved by the Court in connection with the Second Interim Fee Application. Morgan Lewis has not yet received any payments for the Third Interim Period based on the monthly fee statements. Accordingly, and based on those monthly fee statements for the Third Interim Period, Morgan Lewis hereby submits this Third Interim Fee Application, seeking allowance of compensation for professional services in the amount of \$297,566.00 (inclusive of the 20% holdback) and reimbursement of actual and necessary expenses in the amount of \$43,020.59.

**Services Rendered and Disbursements Incurred**

10. During the Third Interim Period, Morgan Lewis advised the Committee on various insurance-related matters and provided necessary insurance-related services in connection with this Chapter 11 Case. Specifically, Morgan Lewis performed the following services as the Committee's special insurance counsel:

- a. Advising the Committee on steps to preserve and maximize insurance coverage;
- b. Attending meetings and negotiating with representatives of the Debtor to preserve insurance coverage and resolve disputed insurance issues;
- c. Analyzing and assisting the Committee in evaluating any settlement motions related to the Debtor's insurance policies;
- d. Investigating the Debtor's proposed settlements of insurance coverage, including coordinating with expert witnesses and the Committee's other professionals and participating in related discovery; and

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<sup>3</sup> \$980,865.23 includes a \$5,100 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Second Interim Fee Application.

- e. Providing additional advice or actions related to the Debtor's insurance coverage as needed by the Committee.

11. As set forth in the Retention Application, Morgan Lewis charged for its legal services on an hourly basis in accordance with its ordinary and customary hourly rates, traditionally adjusted each January 1. These charges included actual, reasonable, and necessary out-of-pocket disbursements incurred in connection therewith. The billing statements, attached as **Exhibit B**, detail the legal services rendered, service dates, personnel involved, time spent, hourly rates, and fees attributable to each service.

12. The Interim Compensation Order authorized the monthly payment of eighty percent (80%) of fees and one hundred percent (100%) of expenses incurred by estate professionals, absent a timely objection upon notice to designated parties. Pursuant to the Interim Compensation Order, and as detailed above, Morgan Lewis filed its monthly fee statements for the Third Interim Period, seeking compensation of \$238,052.80 (80% of \$297,566.00) and reimbursement of total expenses incurred in the amount of \$43,020.59.

13. Through this Fee Application, Morgan Lewis seeks allowance of compensation for professional services in the full amount of \$297,566.00 (inclusive of the 20% holdback) and reimbursement of actual and necessary expenses in the amount of \$43,020.59 incurred during the Third Interim Period. During the Third Interim Period, Morgan Lewis expended a total of 213.10 hours on this matter. Narrative descriptions of the services performed and the time expended during the Third Interim Period are provided below, organized by task or proceeding where applicable.



**A. General/Litigation**

Total Fees: \$251,740.00

Total Hours: 172.5

14. These task codes reflect time spent by Morgan Lewis professionals preparing for and attending hearings bearing on insurance coverage issues, engaging in the Court-ordered mediation with the Debtor and others, negotiating and participating in the drafting of the provisions of a resulting term sheet, collaborating with other committee professionals in the drafting of a proposed plan of reorganization and related plan documents, and advising on the status of these activities to the Committee.

**B. Committee Meetings/Conferences**

Total Fees: \$1,100.00

Total Hours: 0.80

15. This task code includes time spent by Morgan Lewis professionals participating in conferences with the Committee.

**C. Case Administration & Calendar Control**

Total Fees: \$1,430.00

Total Hours: 1.30

16. This task code covers time spent on tasks necessary for the efficient administration of legal services related to the Chapter 11 Case. Specifically, Morgan Lewis professionals monitored critical dates, maintained a case calendar, task lists, and work-in-progress reports, and established procedures for case administration and docket monitoring.

**D. Fee Applications**

Total Fees: \$24,039.50

Total Hours: 27.00

17. This task involves time spent by Morgan Lewis professionals on the preparation, review, and filing of monthly fee statements and the Second Interim Fee Application. The complexity of the invoices, resulting from the nature of the insurance-related work, required detailed review of services rendered across various tasks.

**E. Objections – Fee/Retention Applications**

Total Fees: \$2,249.00

Total Hours: 1.60

18. This task code covers time spent by Morgan Lewis professionals managing and addressing any inquiries or correspondence related to the Second Interim Fee Application. This includes reviewing and responding to communications from relevant parties, coordinating internally to provide necessary information or clarifications, and handling any procedural or substantive issues that arose in connection with that application.

**F. Travel**

Total Fees: \$17,007.50

Total Hours: 9.90

19. This task code covers time spent by Morgan Lewis professionals for non-working travel that is billed at half the timekeeper's standard hourly rate.

20. All services for which Morgan Lewis requests compensation were performed on behalf of the Committee and not for any other person. Morgan Lewis has not entered into any agreement to fix fees or share compensation as prohibited by 18 U.S.C. § 155 and section 504 of the Bankruptcy Code.

**G. Expenses**

21. In addition to the fees incurred above, Morgan Lewis incurred actual and necessary expenses during the Third Interim Period totaling \$43,020.59. Included in **Exhibit B** are itemizations, where applicable, of expenses for which Morgan Lewis seeks reimbursement in this Fee Application. All expenses for which reimbursement is sought were incurred on behalf of the Committee and no other person.

**Morgan Lewis’s Requested Compensation and Reimbursement Should be Allowed**

22. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court’s award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code “reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded . . . the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue, or task addressed;

- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

23. In determining the reasonableness of a compensation request, courts generally apply the lodestar method. *Boddy v. United States Bankruptcy Court (In re Boddy)*, 950 F.2d 334, 337 (6th Cir. 1991) (“The Supreme Court has made it clear that the lodestar method of fee calculation is the method by which federal courts should determine reasonable attorney’s fees under federal statutes that provide for such fees.”); *Shaw, Licitra, Parente, Esernio & Schwartz, P.Z. v. Travelers Indemnity Co. (In re Grant Associates)*, 154 B.R. 836, 843 (S.D.N.Y. 1993) (noting that the lodestar standard had been adopted by most courts calculating fees under section 330(a), and that “[g]iven the similarity in context and language between the two statutes, the same standard should apply” to fees under section 506(c)); *In re Drexel Burnham Lambert Grp., Inc.*, 133 B.R. 13, 21-22 (Bankr. S.D.N.Y. 1991). Courts calculate the lodestar amount by multiplying the number of hours reasonably expended by the attorney’s reasonable hourly rate. *See Drexel*, 133 B.R. at 22 (citing *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 478 U.S. 546, 565 (1986)). In assessing the reasonableness of a compensation request, there is a “strong presumption” that an attorney is entitled to the lodestar fee. *Id.*

24. Morgan Lewis submits that the compensation for services rendered and reimbursement of expenses incurred during the Third Interim Period are reasonable and appropriate based on: (i) the time and labor required; (ii) the complexity of the legal issues presented; (iii) the skill necessary to perform the legal services; (iv) the customary compensation for such services; and (v) the experience and ability of the attorneys providing these services.

25. The Committee retained Morgan Lewis as its special insurance counsel due to the firm's: (i) intimate familiarity with the Debtor and the specific insurance issues involved, and (ii) reputation and extensive expertise in insurance matters. Morgan Lewis's deep understanding of the Debtor and its insurance-related issues enabled efficient and cost-effective service.

26. Morgan Lewis reserves the right to request additional compensation for the Third Interim Period if further time or disbursement charges for services rendered or expenses incurred relate to the Third Interim Period.

**Statement Pursuant to Appendix B Guidelines**

27. The following is provided in response to the questions set forth in ¶ C.5 of the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*:

**Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period?

**Response:** No.

**Question:** If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

**Response:** Not applicable.

**Question:** Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

**Response:** No.

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

**Response:** The fees reflected in billing code titled Fee Applications-Self relate to Morgan Lewis preparation of monthly fee statements and fee applications as well as review and revision of its invoices.

**Question:** Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?

**Response:** Yes, in connection with the review of the monthly time records for submission of the monthly fee statements and fee applications, Morgan Lewis reviewed the time detail for privileged or confidential information.

**Question:** Does this fee application include rate increases since retention?

**Response:** Yes. Pursuant to internal operating procedures and past practices, Morgan Lewis adjusts as appropriate its hourly rates on January 1<sup>st</sup> of each year. The table in this third interim fee application labeled “Summary of Professionals Rendering Services for the Third Interim Period” reflects the hourly rate increase for professionals and paraprofessionals providing services to the Unsecured Creditors’ Committee during the pendency of this case.

**Question:** Did the client agree when retaining Morgan Lewis to accept all future rate increases? If not, did Morgan Lewis inform the client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

**Response:** The client was notified at the outset of the engagement that Morgan Lewis’s hourly rates are reviewed and revised generally on January 1st of each year.

WHEREFORE, Morgan Lewis requests that the Court enter an order: (a) awarding Morgan Lewis compensation for services rendered during the Third Interim Period in the amount of \$297,566.00, and reimbursement of actual, reasonable, and necessary expenses incurred during the Third Interim Period in the amount of \$43,020.59; (b) authorizing and directing the Debtor to remit payment to Morgan Lewis for such fees and expenses that remain unpaid; and (c) granting any further relief the Court deems just and appropriate under the circumstances.

Dated: April 14, 2025

By: /s/ Brady Edwards  
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**EXHIBIT A**

**Morgan Lewis Retention Order**



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*Proposed 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)

**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF  
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,  
EFFECTIVE NUNC PRO TUNC AS OF JULY 29, 2024**

Upon consideration of the *Application of the Official Committee of Unsecured Creditors to Retain and Employ Morgan, Lewis & Bockius LLP as the Committee’s Special Insurance Counsel, Effective Nunc Pro Tunc as of July 29, 2024* (the “**Application**”),<sup>1</sup> pursuant to sections 105(a), 327(e), 328, and 1103(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 2014 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), rule 2014-1

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Virginia (the “**Local Rules**”), and section VI.F.4 of the Procedures for Complex Chapter 11 Cases in the Eastern District of Virginia, authorizing and approving the employment of Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”) as special insurance counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the above-captioned bankruptcy case of Hopeman Brothers, Inc. (the “**Debtor**”), effective as of July 29, 2024; and upon the declarations of Brady Edwards and Lisa Nathanson Busch filed in support of the Application (the “**Declarations**”); and the Court having jurisdiction to consider the Application and the relief in the Application being a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having reviewed the Application; and the Court having found that Morgan Lewis represents or holds no interest adverse to the Debtor’s estate concerning the matters on which it is employed; and the Court having determined that the relief requested in the Application is in the best interests of the Debtor’s estate, its creditors and other parties in interest; and the Committee having provided adequate and appropriate notice of the Application under the circumstances and no other or further notice of the Application need be provided; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and good and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Application is **GRANTED** as set forth herein.
2. Objections, if any, to the relief requested in the Application that have not been withdrawn or resolved by this Order are overruled in all respects.
3. Pursuant to sections 105(a), 327(e), 328(a), and 1103(b) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, the Committee is authorized to employ and retain

Morgan Lewis as special insurance counsel under the terms and conditions set forth in the Application and the Declarations effective as of July 29, 2024.

4. The terms and conditions of the retention of Morgan Lewis set forth in the Application and in the Declarations are reasonable, and Morgan Lewis shall be compensated in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures and orders of the Court.

5. Morgan Lewis intends to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filing under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, both in connection with the Application and the interim and final fee applications filed by Morgan Lewis in the course of its engagement.

6. The Committee and Morgan Lewis are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

7. Notwithstanding any provision in the Bankruptcy Code or the Bankruptcy Rules to the contrary, this Order shall be effective and enforceable immediately upon entry.

8. This Court shall retain exclusive jurisdiction with respect to the enforcement, implementation or interpretation of this Order.

Oct 4 2024

Dated: \_\_\_\_\_, 2024  
Richmond, Virginia

/s/ Keith L Phillips  
\_\_\_\_\_  
HONORABLE KEITH L. PHILLIPS  
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: Oct 4 2024

WE ASK FOR THIS:

CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

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, 8<sup>th</sup> Floor  
Washington, DC 20036  
Telephone: (202) 862-5000  
Facsimile: (202) 429-3301  
Email: kmaclay@capdale.com  
tphillips@capdale.com  
jliesemer@capdale.com  
nmiller@capdale.com

*Counsel to 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  
Facsimile: (713) 890-5001  
Email: brady.edwards@morganlewis.com

W. Brad Nes (admitted *pro hac vice*)

1717 Main Street, Suite 3200  
Dallas, TX 75201-7347  
Telephone: (214) 466-4000  
Facsimile: (214) 466-4001  
Email: brad.nes@morganlewis.com

Jeffrey S. Raskin (admitted *pro hac vice*)

One Market, Spear Street Tower, 28<sup>th</sup> Floor  
San Francisco, CA 94105-1596  
Telephone: (415) 442-1000  
Facsimile: (415) 442-1001  
Email: jeffrey.raskin@morganlewis.com

*Proposed Special Insurance Counsel to the  
Official Committee of Unsecured Creditors*

SEEN AND NO OBJECTION:

/s/ Kathryn Montgomery

Kathryn Montgomery  
Office of the United States Trustee  
701 East Broad Street  
Suite 4304  
Richmond, VA 23219

*United States Trustee*

**CERTIFICATION OF ENDORSEMENT  
UNDER LOCAL BANKRUPTCY RULE 9022-1(C)**

I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Jeffrey A. Liesemer

**EXHIBIT B**

**Invoices**

**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*)  
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 Dallas, TX 75201-7347  
 Telephone: (214) 466-4000

Jeffrey S. Raskin (admitted *pro hac vice*)  
 One Market, Spear Street Tower, 28<sup>th</sup> 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)

**FIFTH 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 DECEMBER 1, 2024 THROUGH DECEMBER 31, 2024**

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:	December 1, 2024 through December 31, 2024
Total Fees Requested:	\$47,796.40 (80% of \$59,745.50)
Total Expenses Requested:	\$24,329.15

Type of Fee Statement:	Monthly <sup>1</sup>
------------------------	----------------------

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 December 1, 2024 through December 31, 2024 (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 \$72,125.55, consisting of (i) \$47,796.40, 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) \$24,329.15 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.

---

<sup>1</sup> 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 \$72,125.55, consisting of (i) \$47,796.40, 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) \$24,329.15 for actual and necessary costs and expenses.

Dated: January 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**

<b>Task Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
00	General	11.90	\$13,539.00
07	Fee Applications - Self	10.80	\$8,274.50
08	Objections – Fee/Retention Applications	0.40	\$744.00
10	Litigation	16.70	\$24,318.00
16	Non-Working Travel <sup>1</sup>	9.00	\$12,870.00
<b>TOTAL</b>		<b>48.80</b>	<b>\$59,745.50</b>

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<sup>1</sup> 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:

<b>Professional</b>	<b>Position</b>	<b>First Bar Date</b>	<b>Section</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Cox, David S	Partner	1995	Litigation	\$1,265.00	11.10	\$14,041.50
Edwards, Brady	Partner	1995	Litigation	\$1,860.00	5.70	\$10,602.00
Nes, W. Brad	Partner	2005	Litigation	\$1,330.00	0.60	\$798.00
Raskin, Jeffrey S	Partner	1993	Litigation	\$1,430.00	17.20	\$24,596.00
Shim, David K.	Associate	2016	Finance	\$985.00	1.60	\$1,576.00
Gonzales, Rachael T.	Associate	2022	Finance	\$710.00	8.90	\$6,319.00
				<b>Total</b>	<b>45.10</b>	<b>57,932.50</b>

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

<b>Paraprofessional</b>	<b>Position</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Guzzi, Tiffany A.	Paralegal	Litigation	\$490.00	3.70	\$1,813.00
			<b>Total</b>	<b>3.70</b>	<b>\$1,813.00</b>

**EXHIBIT C**

**Summary of Expenses Incurred During the Fee Period**

<b>Type</b>	<b>Expenses</b>
Air Travel	\$2,182.54
Court Reporter	\$10,280.63
Court Transcripts	\$237.00
Data Services Active	\$1,740.80
Litigation Support Vendors	\$5,134.18
User Fees (Monthly) – Relativity	\$2,090.00
Videographers	\$2,595.00
Legal Research	\$69.00
<b>Total</b>	<b>\$24,329.15</b>

**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

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, Virginia 23219

Invoice Date: January 10, 2025  
Invoice No. 5588017  
Account No. 139505-0001

### Summary of Services for the period ended December 31, 2024:

Re: Hopeman Creditors Committee

Fees	\$	59,745.50
Disbursements	\$	24,329.15
<b>Total Current Period Charges</b>	<b>\$</b>	<b>84,074.65</b>

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: January 10, 2025  
Invoice No. 5588017  
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, Virginia 23219

### REMITTANCE COPY

#### Summary of Services for the period ended December 31, 2024:

##### Re: Hopeman Creditors Committee

Fees	\$	59,745.50
Disbursements	\$	24,329.15
<b>Total Current Period Charges</b>	<b>\$</b>	<b>84,074.65</b>

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

<p>Please send your remittance to: Morgan, Lewis &amp; 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 &amp; Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S</p>	<p><b>For ACH transfers:</b> ABA# 031000503 Acct# 2100010985563 Reference account number  <b>Remittance detail address</b> 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	0.00	84	238,023.66
11/15/24	5552180	309,570.64	0.00	56	309,570.64
12/13/24	5570374	438,370.93	0.00	28	438,370.93
<b>TOTAL OUTSTANDING</b>					<b>\$ 985,965.23</b>

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

Please send your remittance to: <b>Morgan, Lewis &amp; Bockius LLP</b> P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050	Or please wire your remittance to: <b>Wells Fargo Bank, N.A.</b> ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBUS6S	<b>For ACH transfers:</b> ABA# 031000503 Acct# 2100010985563 Reference account number  <b>Remittance detail address</b> cashapplication@morganlewis.com
--	--	---



# Morgan Lewis

January 10, 2025  
Page 1

Invoice No. 5588017  
Account No. 139505-0001

## Detail for Fee Services Rendered

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
12/02/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.30	147.00
12/03/24	10	Litigation	Analyze HII objection to settlement motions (.3) analyze proposed orders from debtor regarding term sheet (.3) and confer with Caplin team regarding next steps.(.2).	Cox, D.S.	1,265.00	0.80	1,012.00
12/03/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.20	98.00
12/03/24	10	Litigation	Review and revise draft Agreed Order Continuing the Hearing on the Chubb Insurer Settlement Motion and Motion for Mediation on the Chubb Settlement Motion.	Nes, W. B.	1,330.00	0.30	399.00
12/04/24	10	Litigation	Prepare for and conduct call with Caplin team regarding status of proposed orders and telephone conference with T. Branham regarding same.	Cox, D.S.	1,265.00	0.80	1,012.00
12/04/24	10	Litigation	Conference call with Caplin team and Morgan Lewis team regarding litigation strategy.	Nes, W. B.	1,330.00	0.30	399.00
12/05/24	07	Fee Applications - Self	Reviewing invoice proforma for November 2024 to prepare monthly statement.	Gonzales, R.	710.00	2.00	1,420.00
12/05/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.20	98.00
12/06/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.20	98.00

# Morgan Lewis

January 10, 2025  
Page 2

Invoice No. 5588017  
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
12/09/24	10	Litigation	Telephone conferences and email exchanges with M. Clark and debtor's counsel regarding December 16th hearing.	Cox, D.S.	1,265.00	1.80	2,277.00
12/09/24	07	Fee Applications - Self	Reviewing invoices for interim application.	Gonzales, R.	710.00	0.40	284.00
12/09/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.20	98.00
12/10/24	10	Litigation	Confer with B. Edwards and debtor's counsel regarding December 16th hearing..	Cox, D.S.	1,265.00	0.60	759.00
12/10/24	10	Litigation	Analyze correspondence regarding hearings and strategy for same.	Edwards, B.	1,860.00	0.40	744.00
12/10/24	10	Litigation	Confer with Caplin and internal team regarding treatment of inquiries from non-committee member plaintiffs' counsel and related strategy issues.	Edwards, B.	1,860.00	0.90	1,674.00
12/10/24	10	Litigation	Prepare for and attend committee meeting, including numerous follow-up action items.	Edwards, B.	1,860.00	1.20	2,232.00
12/11/24	10	Litigation	Prepare for and conduct videoconferences with debtor counsel regarding proposed order and motion.	Cox, D.S.	1,265.00	1.30	1,644.50
12/11/24	10	Litigation	Work with team to formulate strategy and prepare for upcoming hearings.	Edwards, B.	1,860.00	1.00	1,860.00
12/11/24	07	Fee Applications - Self	Drafting second interim application.	Gonzales, R.	710.00	2.00	1,420.00

# Morgan Lewis

January 10, 2025  
Page 3

Invoice No. 5588017  
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
12/11/24	07	Fee Applications - Self	Correspondence with billing regarding fee application.	Gonzales, R.	710.00	0.40	284.00
12/11/24	07	Fee Applications - Self	Preparing and reviewing the invoices for the monthly fee statement.	Gonzales, R.	710.00	1.20	852.00
12/11/24	00	General	Conferences concerning hearing on motion to approve the Certain Settling Insurers' settlement agreement.	Raskin, J. S.	1,430.00	0.80	1,144.00
12/12/24	10	Litigation	Prepare for and attend status conference (1.0) and related follow-up (.7).	Cox, D.S.	1,265.00	1.70	2,150.50
12/12/24	10	Litigation	Work with team regarding strategy for upcoming video conference with court.	Edwards, B.	1,860.00	0.20	372.00
12/12/24	07	Fee Applications - Self	Correspondence with billing regarding fee application.	Gonzales, R.	710.00	0.20	142.00
12/12/24	07	Fee Applications - Self	Begin preparing second interim fee application.	Gonzales, R.	710.00	1.00	710.00
12/12/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.40	196.00
12/13/24	10	Litigation	Analyze revisions to proposed order and email to Caplin/MLB teams regarding same.	Cox, D.S.	1,265.00	0.30	379.50
12/13/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.20	98.00
12/15/24	10	Litigation	Exchange emails with T. Phillips regarding request from M. Clark.	Cox, D.S.	1,265.00	0.30	379.50
12/15/24	10	Litigation	Correspondence and telephone conferences with committee members' counsel regarding issues related to upcoming Chubb mediation.	Edwards, B.	1,860.00	0.40	744.00

# Morgan Lewis

January 10, 2025  
Page 4

Invoice No. 5588017  
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
12/15/24	16	Travel	Travel from San Francisco to Richmond, Virginia to attend hearing on motion to approve the Certain Settling Insurers settlement agreement. (9 hrs total travel time - billed at half-time for non-working travel)	Raskin, J. S.	1,430.00	4.50	6,435.00
12/16/24	10	Litigation	Attend hearing and analyze revisions to proposed order.	Cox, D.S.	1,265.00	3.20	4,048.00
12/16/24	10	Litigation	Work on strategy for approval hearing and next steps.	Edwards, B.	1,860.00	0.90	1,674.00
12/16/24	07	Fee Applications - Self	Preparing interim fee application.	Gonzales, R.	710.00	1.00	710.00
12/16/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.30	147.00
12/16/24	00	General	Attend hearing on motion to approve the Resolute settlement (6.0); communications concerning the hearing on the motion to approve the Resolute settlement (1.0).	Raskin, J. S.	1,430.00	7.00	10,010.00
12/17/24	07	Fee Applications - Self	Correspond with MLB working group regarding monthly fee statement.	Gonzales, R.	710.00	0.10	71.00
12/17/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.40	196.00
12/17/24	16	Travel	Travel from Richmond, VA to San Francisco in connection with hearing on motion to approve the Resolute settlement. (9 hrs total travel time - billed at half-time for non-working travel)	Raskin, J. S.	1,430.00	4.50	6,435.00
12/18/24	08	Objections - Fee/Retention Applications	Prepare invoice for fee application.	Edwards, B.	1,860.00	0.40	744.00

# Morgan Lewis

January 10, 2025  
Page 5

Invoice No. 5588017  
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
12/18/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.20	98.00
12/18/24	00	General	Communications concerning contents of proposed order approving the Resolute settlement.	Raskin, J. S.	1,430.00	0.40	572.00
12/18/24	07	Fee Applications - Self	Review the draft and data sent by R. Gonzales regarding November monthly statement (.1); Confer with R. Gonzales regarding November monthly statement (.2); Revise the draft of November monthly statement and exhibits thereto (.1); Confer with B. Edwards regarding the November monthly statement (.1).	Shim, D. K.	985.00	0.50	492.50
12/19/24	07	Fee Applications - Self	Correspond with MLB working group regarding monthly fee statement.	Gonzales, R.	710.00	0.20	142.00
12/19/24	07	Fee Applications - Self	Confer with the committee's counsel regarding MLB monthly statement (.3); Confer with R. Gonzales regarding LEDES files (.1).	Shim, D. K.	985.00	0.40	394.00
12/20/24	07	Fee Applications - Self	Confer with D. Shim and N. Miller regarding fee application.	Cox, D.S.	1,265.00	0.30	379.50

# Morgan Lewis

January 10, 2025  
Page 6

Invoice No. 5588017  
Account No. 139505-0001

Date	Task	Task Description	Description	Timekeeper	Rate	Hours	Amount
12/20/24	07	Fee Applications - Self	Review the draft November monthly statement based on comments received from the committee's counsel (.1); Confer with R. Gonzales regarding the committee's comments on the draft November monthly statement (.1); Confer with K. Cooper regarding the revised invoice (.1); Confer with the committee's counsel regarding the November monthly statement (.3); Confer with D. Cox regarding the monthly statement (.1).	Shim, D. K.	985.00	0.70	689.50
12/23/24	00	General	Evaluate case pleading and communicate with court reporter regarding hearing transcript order.	Guzzi, T. A.	490.00	0.50	245.00
12/24/24	07	Fee Applications - Self	Correspondence related to fee applications.	Gonzales, R.	710.00	0.40	284.00
12/24/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.20	98.00
12/26/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.20	98.00
12/30/24	00	General	Evaluate case pleadings.	Guzzi, T. A.	490.00	0.20	98.00
12/31/24	10	Litigation	Analyze HII appellate filings.	Edwards, B.	1,860.00	0.30	558.00
<b>Matter Total</b>						<b>48.80</b>	<b>\$ 59,745.50</b>

# Morgan Lewis

January 10, 2025  
Page 7

Invoice No. 5588017  
Account No. 139505-0001

## Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	11.10	1,265.00	14,041.50
Edwards, B.	5.70	1,860.00	10,602.00
Nes, W. B.	0.60	1,330.00	798.00
Raskin, J. S.	17.20	1,430.00	24,596.00
ASSOCIATE			
Gonzales, R.	8.90	710.00	6,319.00
Shim, D. K.	1.60	985.00	1,576.00
PARALEGAL			
Guzzi, T. A.	3.70	490.00	1,813.00
Matter Total		48.80	\$ 59,745.50

# Morgan Lewis

January 10, 2025  
Page 8

Invoice No. 5588017  
Account No. 139505-0001

## Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
11/20/24	Cox, David S	Litigation Support Vendor Charges - Veritext - Transcript services for witness Christopher Lascell	5,134.18
11/21/24	Nes, W. Brad	Videographers - Veritext - Videographer	1,695.00
12/03/24	Popecki, Christopher	WestLaw	69.00
12/10/24	Raskin, Jeffrey S	Court Reporter - Veritext - Deposition of Ron Van Epps and corporate designee.	5,524.06
12/10/24	Raskin, Jeffrey S	Court Reporter - Veritext - Deposition of Ronald Van Epps	2,326.00
12/11/24	Raskin, Jeffrey S	Air GVYHES : 4456041488 : 2024-12-15 - 2024-12-17 : RASKIN/JEFFREY-->SFODENRICIADSFO : Billable	132.99
12/11/24	Raskin, Jeffrey S	Air GVYHES : 016 7165440459 : 2024-12-15 - 2024-12-17 : RASKIN/JEFFREY-->SFODENRICIADSFO : Billable	2,012.56
12/11/24	Raskin, Jeffrey S	Air GVYHES : 4456041482 : 2024-12-15 - 2024-12-17 : RASKIN/JEFFREY-->SFODENRICIADSFO : Billable	36.99
12/11/24	Nes, W. Brad	Videographers - Veritext - Videographer	900.00
12/23/24	Raskin, Jeffrey S	Court Transcripts - eScribers, LLC - - - Transcript fee for motions hearing on December 16, 2024.	237.00
12/25/24	Nes, W. Brad	Court Reporter - Veritext - Depo. of Ross Mishkin	2,430.57
12/31/24	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; December; 22.00 User	2,090.00
12/31/24	Data Services, Data Services	Data Services Active - R fee; December; 87.04 GB	1,740.80
<b>Total Disbursements</b>			<b>\$ 24,329.15</b>



# Morgan Lewis

January 10, 2025  
Page 9

Invoice No. 5588017  
Account No. 139505-0001

## Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Air	2,182.54
Litigation Support Vendor Charges	5,134.18
Court Reporter	10,280.63
Court Transcripts	237.00
Videographers	2,595.00
Westlaw Charges	69.00
Data Services Active - R	1,740.80
User Fees (Monthly) - Relativity	2,090.00
<b>Total Disbursements</b>	<b>\$ 24,329.15</b>

**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, 28<sup>th</sup> 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 <sup>1</sup>
------------------------	----------------------

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.

---

<sup>1</sup> 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**

<b>Task Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
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 <sup>1</sup>	9.90	\$17,007.50
<b><u>TOTAL</u></b>		<b><u>99.90</u></b>	<b><u>\$145,220.50</u></b>

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<sup>1</sup> 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
				<b>Total</b>	<b>94.30</b>	<b>\$142,212.50</b>

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
			<b>Total</b>	<b>5.80</b>	<b>\$3,008.00</b>

**EXHIBIT C**

**Summary of Expenses Incurred During the Fee Period**

<b>Type</b>	<b>Expenses</b>
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
<b><u>Total</u></b>	<b>\$7,967.86</b>



**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
<b>Total Current Period Charges</b>	<b>\$</b>	<b>153,188.36</b>

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
<b>Total Current Period Charges</b>	<b>\$</b>	<b>153,188.36</b>

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

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

# 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
<b>TOTAL OUTSTANDING</b>					<b>\$ 1,064,939.88</b>

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

Please send your remittance to: <b>Morgan, Lewis &amp; Bockius LLP</b> P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050	Or please wire your remittance to: <b>Wells Fargo Bank, N.A.</b> ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S	<b>For ACH transfers:</b> ABA# 031000503 Acct# 2100010985563 Reference account number  <b>Remittance detail address</b> cashapplication@morganlewis.com
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# 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  
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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  
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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  
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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  
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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 Huennekens.	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  
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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  
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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
<b>Total Disbursements</b>			<b>\$ 7,967.86</b>

# 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/>	

**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, 28<sup>th</sup> 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)

**SEVENTH 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 FEBRUARY 1, 2025 THROUGH FEBRUARY 28, 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:	February 1, 2025 through February 28, 2025
Total Fees Requested:	\$74,080.00 (80% of \$92,600.00)
Total Expenses Requested:	\$10,723.58

Type of Fee Statement:	Monthly <sup>1</sup>
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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 February 1, 2025 through February 28, 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 \$84,803.58, consisting of (i) \$74,080.00, 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) \$10,723.58 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.

---

<sup>1</sup> 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 \$84,803.58, consisting of (i) \$74,080.00, 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) \$10,723.58 for actual and necessary costs and expenses.

Dated: March 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**

<b>Task Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
00	General	2.00	\$1,040.00
04	Case Administration & Calendar Control	0.10	\$110.00
07	Fee Application – Self	5.60	\$4,860.00
08	Objections – Fee/Retention Applications	0.30	\$330.00
10	Litigation	55.60	\$85,160.00
15	Committee Meetings/Conferences	0.80	\$1,100.00
<b><u>TOTAL</u></b>		<b><u>64.40</u></b>	<b><u>\$92,600.00</u></b>

**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:

<b>Professional</b>	<b>Position</b>	<b>First Bar Date</b>	<b>Section</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Cox, David S.	Partner	1995	Litigation	\$1,375.00	27.80	\$38,225.00
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	7.80	\$15,795.00
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	20.80	\$32,240.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	5.20	\$4,420.00
Shim, David	Associate	2016	Finance	\$1,100.00	0.80	\$880.00
				<b>Total</b>	<b>62.40</b>	<b>\$91,560.00</b>

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

<b>Paraprofessional</b>	<b>Position</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Guzzi, Tiffany A.	Paralegal	Litigation	\$520.00	2.00	\$1,040.00
			<b>Total</b>	<b>2.00</b>	<b>\$1,040.00</b>



**EXHIBIT C**

**Summary of Expenses Incurred During the Fee Period**

<b>Type</b>	<b>Expenses</b>
Air Travel	\$1,773.48
Data Services	\$20.00
Data Services – R	\$1,738.80
Hotel	\$510.80
Taxi	\$20.00
User Fees (Monthly) – Relativity	\$1,520.00
Legal Research	\$5,140.50
<b><u>Total</u></b>	<b>\$10,723.58</b>

**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: March 17, 2025  
Invoice Number 5623718  
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 February 28, 2025:

#### Re: Hopeman Creditors Committee

Fees	\$	92,600.00
Disbursements	\$	10,723.58
<b>Total Current Period Charges</b>	<b>\$</b>	<b>103,323.58</b>

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: March 17, 2025  
Invoice Number 5623718  
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 February 28, 2025:

##### Re: Hopeman Creditors Committee

Fees	\$	92,600.00
Disbursements	\$	10,723.58
<b>Total Current Period Charges</b>	<b>\$</b>	<b>103,323.58</b>

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

<p>Please send your remittance to: <b>Morgan, Lewis &amp; Bockius LLP</b> P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050</p>	<p>Or please wire your remittance to: <b>Wells Fargo Bank, N.A.</b> ABA# 121000248 Morgan, Lewis &amp; Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S</p>	<p><b>For ACH transfers:</b> ABA# 031000503 Acct# 2100010985563 Reference account number</p> <p><b>Remittance detail address</b> cashapplication@morganlewis.com</p>
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# 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	150	236,323.66
11/15/24	5552180	309,570.64	1,700.00	122	307,870.64
12/13/24	5570374	438,370.93	1,700.00	94	436,670.93
01/10/25	5588017	84,074.65	0.00	66	84,074.65
02/14/25	5608788	153,188.36	0.00	31	153,188.36
<b>TOTAL OUTSTANDING</b>					<b>\$ 1,218,128.24</b>

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

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

March 17, 2025  
Page 1

Invoice Number 5623718  
Account No. 139505-0001

## Detail for Fee Services Rendered

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
02/03/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
02/04/25	15	Committee Meetings/Conferences	Prepare for and attend committee meeting.	Cox, D.S.	1,375.00	0.80	1,100.00
02/04/25	07	Fee Applications - Self	Follow up regarding order granting second interim fee application.	DeSantis, C. M.	850.00	0.30	255.00
02/04/25	10	Litigation	Attend Committee meeting.	Raskin, J. S.	1,550.00	0.50	775.00
02/06/25	07	Fee Applications - Self	Email with counsel for UCC regarding CNO.	DeSantis, C. M.	850.00	0.20	170.00
02/06/25	10	Litigation	Attend conference concerning mediation issues.	Raskin, J. S.	1,550.00	0.80	1,240.00
02/07/25	10	Litigation	Analyze revised term sheet and related inquiries from Hopeman.	Cox, D.S.	1,375.00	0.40	550.00
02/07/25	07	Fee Applications - Self	Revise CNO and proposed order granting second interim fee application to incorporate comments from counsel to UCC.	DeSantis, C. M.	850.00	2.00	1,700.00
02/07/25	08	Objections - Fee/Retention Applications	Communicate with C. DeSantis regarding MLB's revised proposed order for the second interim fee application.	Shim, D. K.	1,100.00	0.20	220.00
02/09/25	10	Litigation	Analyze Hopeman revisions to term sheet and information requests.	Cox, D.S.	1,375.00	0.40	550.00

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
02/10/25	10	Litigation	Analyze Hopeman revisions to term sheet and information requests, outline responses to insurance-related questions and confer with MLB team regarding same.	Cox, D.S.	1,375.00	3.70	5,087.50
02/10/25	07	Fee Applications - Self	Follow up regarding Hopeman CNO.	DeSantis, C. M.	850.00	0.10	85.00
02/10/25	10	Litigation	Prepare for upcoming mediation session.	Edwards, B.	2,025.00	0.50	1,012.50
02/10/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.40	208.00
02/10/25	10	Litigation	Analyze certain issues raised by Hopeman in response to proposed 524(g) term sheet.	Raskin, J. S.	1,550.00	2.80	4,340.00
02/10/25	08	Objections - Fee/Retention Applications	Communicate with C. DeSantis regarding the certificate of no objection.	Shim, D. K.	1,100.00	0.10	110.00
02/11/25	10	Litigation	Analyze Chubb settlements and policies in connection with inquiries from Hopeman regarding term sheet, videoconference with MLB team regarding term sheet and prepare email to Caplin team regarding same,.	Cox, D.S.	1,375.00	4.50	6,187.50
02/11/25	07	Fee Applications - Self	Follow up regarding as-filed CNO regarding Second Interim Fee Application.	DeSantis, C. M.	850.00	0.10	85.00
02/11/25	10	Litigation	Video conference with Caplin to prepare for upcoming continued mediation session.	Edwards, B.	2,025.00	0.50	1,012.50

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
02/11/25	10	Litigation	Conference with Committee's counsel concerning insurance issues arising from proposed 524(g) term sheet.	Raskin, J. S.	1,550.00	0.50	775.00
02/12/25	10	Litigation	Prepare for and conduct videoconferences with Caplin team and with Debtor's counsel in furtherance of mediation and related follow-up.	Cox, D.S.	1,375.00	3.70	5,087.50
02/12/25	10	Litigation	Attend video mediation session with Judge Huennekens and Hopeman's counsel.	Edwards, B.	2,025.00	1.50	3,037.50
02/12/25	10	Litigation	Video conference with Caplin and team to prepare for upcoming mediation.	Edwards, B.	2,025.00	0.90	1,822.50
02/12/25	10	Litigation	Telephone conference with committee member's counsel regarding strategy and next steps.	Edwards, B.	2,025.00	0.30	607.50
02/12/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
02/12/25	10	Litigation	Mediation pre-call with Committee counsel and attend mediation with Hopeman and mediator.	Raskin, J. S.	1,550.00	2.40	3,720.00
02/13/25	10	Litigation	Analyze revised term sheet and related follow-up regarding coverage issues.	Cox, D.S.	1,375.00	1.80	2,475.00
02/13/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
02/14/25	10	Litigation	Exchange correspondence with Caplin team regarding revised term sheet and correspondence to Debtor counsel.	Cox, D.S.	1,375.00	0.90	1,237.50



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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
02/14/25	10	Litigation	Video conference with constituent regarding status.	Edwards, B.	2,025.00	0.20	405.00
02/14/25	07	Fee Applications - Self	Review MLB's January monthly fee statement and correspond with MLB working group regarding order granting MLB's second interim fee application.	Shim, D. K.	1,100.00	0.20	220.00
02/17/25	10	Litigation	Analyze revised term sheet.	Cox, D.S.	1,375.00	1.20	1,650.00
02/17/25	10	Litigation	Analyze FTI's mediation-related analysis per request of the Debtor.	Raskin, J. S.	1,550.00	0.50	775.00
02/18/25	10	Litigation	Attend mediation meeting with Hopeman's counsel.	Edwards, B.	2,025.00	1.30	2,632.50
02/18/25	10	Litigation	Prepare for and attend committee meeting.	Edwards, B.	2,025.00	0.70	1,417.50
02/18/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
02/18/25	10	Litigation	Attend Committee meeting.	Raskin, J. S.	1,550.00	0.50	775.00
02/18/25	04	Case Administration & Calendar Control	Review chapter 11 docket.	Shim, D. K.	1,100.00	0.10	110.00
02/19/25	10	Litigation	Analyze revised term sheet and comments regarding FTI analysis.	Cox, D.S.	1,375.00	0.60	825.00
02/19/25	07	Fee Applications - Self	Analyze bankruptcy docket regarding fee change requirements and report to D. Shim regarding same.	DeSantis, C. M.	850.00	0.40	340.00
02/19/25	07	Fee Applications - Self	Finalize and follow up with Committee counsel regarding Sixth Monthly Fee Statement.	DeSantis, C. M.	850.00	0.20	170.00

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
02/19/25	10	Litigation	Prepare for upcoming mediation.	Edwards, B.	2,025.00	0.60	1,215.00
02/19/25	10	Litigation	Analyze potential revisions to mediation-related analysis.	Raskin, J. S.	1,550.00	1.20	1,860.00
02/19/25	07	Fee Applications - Self	Correspond with MLB working group regarding MLB's January monthly fee statement.	Shim, D. K.	1,100.00	0.10	110.00
02/20/25	10	Litigation	Prepare for and conduct further mediation with debtor, videoconference with committee counsel regarding related follow-up and revise mediation-related analysis.	Cox, D.S.	1,375.00	3.70	5,087.50
02/20/25	07	Fee Applications - Self	Finalize Sixth Monthly Fee Statement.	DeSantis, C. M.	850.00	1.20	1,020.00
02/20/25	10	Litigation	Continue mediation with debtor's counsel, including follow-up issues.	Edwards, B.	2,025.00	1.10	2,227.50
02/20/25	00	General	Evaluate case pleadings and hearing notices.	Guzzi, T. A.	520.00	0.30	156.00
02/20/25	10	Litigation	Conference concerning revised mediation-related analysis.	Raskin, J. S.	1,550.00	0.70	1,085.00
02/20/25	10	Litigation	Communications concerning revised mediation-related analysis.	Raskin, J. S.	1,550.00	0.60	930.00
02/20/25	07	Fee Applications - Self	Correspond with MLB working group regarding MLB's January monthly fee statement.	Shim, D. K.	1,100.00	0.10	110.00

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
02/21/25	10	Litigation	Revise mediation-related analysis and confer with committee counsel regarding same.	Cox, D.S.	1,375.00	1.20	1,650.00
02/21/25	07	Fee Applications - Self	Follow up with UCC counsel regarding finalizing Sixth Monthly Fee Statement.	DeSantis, C. M.	850.00	0.30	255.00
02/21/25	10	Litigation	Prepare several rounds of revisions and additions to portions of the revised mediation-related analysis.	Raskin, J. S.	1,550.00	1.50	2,325.00
02/24/25	10	Litigation	Analyze correspondence from Liberty and work with J. Raskin regarding same.	Cox, D.S.	1,375.00	0.80	1,100.00
02/24/25	10	Litigation	Analyze correspondence from D. Gooding (Choate) requesting Liberty Mutual's inclusion in mediation process.	Edwards, B.	2,025.00	0.20	405.00
02/24/25	10	Litigation	Internal communications concerning 524(g) term sheet issues.	Raskin, J. S.	1,550.00	2.00	3,100.00
02/25/25	10	Litigation	Confer with J. Raskin regarding committee meeting and term sheet status.	Cox, D.S.	1,375.00	0.30	412.50
02/25/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
02/25/25	10	Litigation	Communications concerning 524(g) term sheet.	Raskin, J. S.	1,550.00	1.20	1,860.00
02/26/25	10	Litigation	Analyze revised term sheet.	Cox, D.S.	1,375.00	0.30	412.50

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
02/27/25	10	Litigation	Analyze HII revisions to term sheet and confer with Caplin team regarding response to same.	Cox, D.S.	1,375.00	1.30	1,787.50
02/27/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
02/27/25	10	Litigation	Analyze 524(g) term sheet issues and conferences regarding same.	Raskin, J. S.	1,550.00	2.40	3,720.00
02/28/25	10	Litigation	Prepare for and attend further mediation session and related follow-up.	Cox, D.S.	1,375.00	2.20	3,025.00
02/28/25	07	Fee Applications - Self	Follow up regarding LEDEs file for Sixth Monthly Fee Statement.	DeSantis, C. M.	850.00	0.40	340.00
02/28/25	10	Litigation	Analyze proposed revisions to 524(g) term sheet and communications regarding same.	Raskin, J. S.	1,550.00	3.20	4,960.00
<b>Matter Total</b>						<b>64.40</b>	<b>\$ 92,600.00</b>

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## Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	27.80	1,375.00	38,225.00
Edwards, B.	7.80	2,025.00	15,795.00
Raskin, J. S.	20.80	1,550.00	32,240.00
ASSOCIATE			
DeSantis, C. M.	5.20	850.00	4,420.00
Shim, D. K.	0.80	1,100.00	880.00
PARALEGAL			
Guzzi, T. A.	2.00	520.00	1,040.00
Matter Total		64.40	\$ 92,600.00

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## Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
01/20/25	Edwards, Brady	Taxi - Brady Edwards - - - taxi	20.00
01/20/25	Edwards, Brady	Data Services - Brady Edwards - - - Brady Edwards -	8.00
01/20/25	Edwards, Brady	Air - Brady Edwards - - - - Only flight available to D.C. due to Houston winter blizzard	1,773.48
01/21/25	Edwards, Brady	Hotel - Brady Edwards - - - Brady Edwards -	510.80
01/22/25	Edwards, Brady	Data Services - Brady Edwards - - - Brady Edwards -	12.00
02/11/25	Cox, David S	WestLaw	2,799.50
02/13/25	Cox, David S	WestLaw	2,004.50
02/14/25	Cox, David S	WestLaw	336.50
02/28/25	Data Services, Data Services	Data Services Active - R fee; February; 86.94 GB	1,738.80
02/28/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; February; 16.00 User	1,520.00
Total Disbursements			\$ 10,723.58

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## Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Taxi	20.00
Hotel	510.80
Air	1,773.48
Data Services	20.00
Westlaw Charges	5,140.50
Data Services Active - R	1,738.80
User Fees (Monthly) - Relativity	1,520.00
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Total Disbursements	\$ 10,723.58
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