

**BLANK ROME LLP**

Kyle P. Brinkman  
 1825 Eye Street NW  
 Washington DC 20006  
 Telephone: (202) 420-2200

*Special Insurance Counsel for Debtor and Debtor in Possession*

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

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<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>HOPEMAN BROTHERS, INC.,</b>	:	<b>Case No. 24-32428 (KLP)</b>
	:	
<b>Debtor.</b>	:	
	:	
	:	

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**SUMMARY OF THIRD INTERIM APPLICATION OF  
 BLANK ROME LLP AS SPECIAL INSURANCE COUNSEL  
FOR DEBTOR AND DEBOR IN POSSESSION**

<b>Basic Information</b>	
Name of Applicant:	Blank Rome LLP
Name of Client:	Hopeman Brothers, Inc. Debtor and Debtor in Possession
Petition Date:	June 30, 2024
Retention Date:	June 30, 2024
Date of Order Approving Employment:	September 9, 2024
<b>This Interim Application</b>	
Time Period Covered:	December 1, 2024 through and including February 28, 2025
Total Hours Billed:	32.6
Total Fees Requested:	\$30,845.70
Total Expenses Requested:	\$0.00
Fees Requested Over Budget:	None
Blended Rate:	<b>\$946.19/hour</b>
Rate Increases Not Previously Approved/Disclosed:	None



Total Professionals:	1
Total Professionals Not in Staffing Plan:	None
Total Professionals Billing Less Than 15 Hours:	None
<b>Historical</b>	
Fees Approved to Date by Interim Order:	\$99,395.10
Expenses Approved to Date by Interim Order:	\$0.00
Allowed Fees Paid to Date:	\$34,292.25
Allowed Expenses Paid to Date:	\$0.00
Fees Paid Pursuant to Monthly Statements, Not Yet Allowed:	\$0.00
Expenses Paid Pursuant to Monthly Statements, Not Yet Allowed:	\$0.00

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

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<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>HOPEMAN BROTHERS, INC.,</b>	:	<b>Case No. 24-32428 (KLP)</b>
	:	
<b>Debtor.</b>	:	
	:	
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**THIRD INTERIM APPLICATION OF  
BLANK ROME LLP AS SPECIAL INSURANCE COUNSEL FOR DEBTOR AND  
DEBOR IN POSSESSION, FOR ALLOWANCE OF INTERIM COMPENSATION  
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM DECEMBER 1, 2024 THROUGH AND INCLUDING FEBRUARY 28, 2025**

Blank Rome LLP (“Blank Rome”), special insurance counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), submits this application (the “Application”) for interim allowance of compensation for professional services rendered by Blank Rome to the Debtor for the period from December 1, 2024 through and including February 28, 2025 (the “Third Interim Application Period”), and reimbursement of actual and necessary expenses incurred by Blank Rome during the Third Interim Application Period 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 Procedure for the United States Bankruptcy Court of the Eastern District of Virginia (the “Local Bankruptcy Rules”), and the *Order (I) Establishing Procedures for Interim*

*Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* entered on September 9, 2024 [Docket No. 162] (the “Interim Compensation Order”). In support of this Application, Blank Rome represents as follows:

**I. JURISDICTION, VENUE AND PREDICATES FOR RELIEF**

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. § 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, and the Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The bases for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Bankruptcy Rule 2016-1.

**II. BACKGROUND**

3. On June 30, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in this Court commencing this chapter 11 case.

4. The Debtor continues to manage its business as debtor in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee has been appointed in this chapter 11 case.

5. On July 22, 2024, the Office of the United States Trustee for the Eastern District of Virginia appointed the Official Committee of Unsecured Creditors (the “Committee”) [Docket No. 69].

6. On September 9, 2024, the Court entered the Interim Compensation Order, which approved the compensation procedures therein (the “Compensation Procedures”).

7. On September 9, 2024, the Court entered the *Order Authorizing the Retention and Employment of Blank Rome as Special Insurance Counsel for the Debtor Effective as of the Petition Date* [Doc. No. 164], authorizing the Debtor to employ and retain Blank Rome as its special insurance counsel, effective as of the Petition Date.

8. Pursuant to the Compensation Procedures, professionals retained in this case are authorized to file monthly fee statements and serve such statements on the Notice Parties (as defined in the Compensation Procedures). Provided that no objection to a monthly fee statement is timely filed, the Debtor is authorized to pay such professional an amount equal to eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such monthly fee statement.

9. Additionally, pursuant to the Compensation Procedures, beginning with the period ending on August 31, 2024, and at three-month intervals thereafter, professionals retained in this case are authorized to file interim fee applications with the Court.

10. The Compensation Procedures also provide that all Retained Professionals (as defined in the Compensation Procedures), to the extent applicable, shall make reasonable efforts to comply with the U.S. Trustee's requests for information and additional disclosures set forth in 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* (the "Appendix B Guidelines") in connection with the interim and final fee applications filed in this case.

### **III. RELIEF REQUESTED**

11. Blank Rome submits this Application (a) for interim allowance of reasonable compensation for the actual, reasonable and necessary professional services that it has rendered as special insurance counsel for the Debtor in this case for the period from December 1, 2024, through and including February 28, 2025, and (b) for reimbursement of actual, reasonable and

necessary expenses incurred in representing the Debtor during that same period. For the period covered by this Application, Blank Rome seeks fees for services rendered in the amount of \$30,845.70. For the same period, Blank Rome seeks actual, reasonable and necessary expenses totaling \$0.00.

12. The Application is supported by the following Exhibits, which are attached hereto and patterned on the Appendix B Guidelines:

- (i) Exhibit A contains a summary schedule of the time expended by all Blank Rome professionals and paraprofessionals engaged in the representation of the Debtor during the Third Interim Application Period.
- (ii) Exhibit B contains a summary schedule of hours and fees covered by this Application, categorized by project code.
- (iii) Exhibit C contains a summary schedule of the out-of-pocket expenses incurred by Blank Rome during the Third Interim Application Period.
- (iv) Exhibit D contains a disclosure of “customary and comparable compensation” charged by Blank Rome professionals and paraprofessionals. As requested in the Appendix B Guidelines, Exhibit D provides a summary of the blended hourly rates of the timekeepers (segregated by rank) included in this Application compared to the blended hourly rates for similar non-bankruptcy domestic timekeepers at Blank Rome.
- (v) Exhibit E contains the budget and staffing plans for Blank Rome for this chapter 11 case during the Third Interim Application Period.
- (vi) Exhibit F contains the monthly fee statements properly served by Blank Rome during the Third Interim Application Period (the “Monthly Statements”).

#### **IV. BASIS FOR RELIEF REQUESTED**

13. During the Third Interim Application Period, Blank Rome provided numerous services to the Debtor, including but not limited to (i) advising the Debtor and the Debtor’s other professionals regarding insurance coverage for asbestos-related claims; (ii) assisting the Debtor and its bankruptcy counsel with insurance issues relating to the Debtor’s motions to approve

certain insurance settlements; (iii) attending by remote appearance the hearing on the Debtor’s motion to approve its settlement with Certain Settling Insurers; (iv) assisting the Debtor and its bankruptcy counsel in mediation arising from the Debtor’s former motion to approve a settlement with the Chubb Insurers; and (v) regularly communicating with the Debtor and the Debtor’s other professionals regarding administrative and strategic issues arising in this case pertaining to the matters noted above.

14. In performing the services detailed in this Application, Blank Rome has endeavored to ensure that its professionals comply with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures or orders of the Court.

15. Pursuant to the terms of the Interim Compensation Order, Blank Rome properly filed and served three Monthly Statements during the Third Interim Application Period as follows:

<b>Period Covered by Monthly Statement</b>	<b>Total Fees</b>	<b>Total Expenses</b>	<b>Date Served and Docket No.</b>	<b>Objection Deadline</b>	<b>Amount of Fees Received (80%)</b>	<b>Amount of Expenses Received (100%)</b>
December 1-31, 2024	\$10,925.10	\$0.00	01/23/25 [Docket No. 522]	02/06/2025	\$0.00	\$0.00
January 1-31, 2025	\$1,660.05	\$0.00	02/24/2025 [Docket No. 586]	03/10/2025	\$0.00	\$0.00
February 1-28, 2025	\$18,260.55	\$0.00	03/31/25 [Docket No. 640]	4/14/2025	\$0.00	\$0.00

16. In accordance with the Compensation Procedures, as set forth in the Interim Compensation Order, and as set forth in Local Rule 2016-1, the Monthly Statements included (i) a detailed itemization of the service hours expended by matter and professional and (ii) a

summary schedule of hours and fees categorized by project code. The Monthly Statements also included a detailed chronological itemization of the services rendered by each professional and paraprofessional, calculated by tenths of an hour and categorized in accordance with the appropriate project code. As set forth above, a copy of Blank Rome's Monthly Statements are attached hereto as Exhibit F.

17. Blank Rome has endeavored to represent the Debtor in the most expeditious and economical manner possible. Tasks have been assigned to attorneys at Blank Rome so that the work has been performed by those most familiar with the particular matter or task and by the lowest hourly rate professional appropriate for a particular matter. Moreover, Blank Rome has endeavored to coordinate with the other professionals involved in this case so as to minimize any duplication of effort and to minimize attorneys' fees and expenses to the Debtor. Blank Rome believes it has been successful in this regard.

18. No agreement or understanding exists between Blank Rome and any other person for the sharing of compensation received or to be received for services rendered in or in connection with this case.

#### **V. STATEMENT PURSUANT TO APPENDIX B GUIDELINES**

19. The following is provided in response to the questions set forth in ¶ C.5 of the Appendix B Guidelines:

**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? If so, please explain.

Response: As set forth in the *Declaration of Kyle Philip Brinkman in Support of the Application of Debtor for Entry of an Order(I) Authorizing the Retention and Employment of Blank Rome LLP as Special Insurance Counsel for Effective as of*



*the Petition Date and (II) Granting Related Relief* (the “Brinkman Declaration”) [Doc. No. 71, Ex. A], the hourly rates and corresponding rate structure used by Blank Rome have been discounted from its standard rate structure for this engagement consistent with the engagement prior to the Debtor’s bankruptcy.

**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 excess of budget for this Application.

**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 this fee application include time or fees related to reviewing the time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing 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: No.

**Question:** Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

**Question:** If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your 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: Yes and the client (i) approved these specific rate increases; and (ii) agreed to permit future annual rate increases when retaining Blank Rome.

## **VI. NOTICE**

20. Notice of this Application has been provided in accordance with the terms of the Interim Compensation Order. Blank Rome submits that no other or further notice need be provided.

*[Remainder of page intentionally left blank]*

**WHEREFORE**, Blank Rome respectfully requests that this Court enter an Order, substantially in the form attached hereto (i) approving this Application, (ii) providing that Blank Rome be allowed on an interim basis the sum of \$30,845.70 as compensation for reasonable and necessary professional services rendered to the Debtor and the sum of \$0.00 for reimbursement of actual and necessary costs and expenses, (iii) authorizing and directing the Debtor to pay Blank Rome the outstanding amount of such sums, and (iv) for such other relief as the Court deems proper and just.

Dated: April 14, 2025  
Washington DC

/s/ Kyle P. Brinkman

Kyle P. Brinkman  
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Telephone: (202) 420-2200

*Special Insurance Counsel for Debtor and Debtor in Possession*

Electronically filed by:

/s/ Henry P. (Toby) Long, III  
Henry P. (Toby) Long, III (VSB No. 75134)  
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*Counsel to the Debtor and Debtor in Possession*

**BLANK ROME LLP**

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*Special Insurance Counsel for Debtor and Debtor in Possession*

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

---

<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>HOPEMAN BROTHERS, INC.,</b>	:	<b>Case No. 24-32428 (KLP)</b>
	:	
<b>Debtor.</b>	:	
	:	
	:	

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**ORDER GRANTING THIRD INTERIM APPLICATION OF  
BLANK ROME LLP AS SPECIAL INSURANCE COUNSEL FOR DEBTOR AND  
DEBOR IN POSSESSION, FOR ALLOWANCE OF INTERIM COMPENSATION  
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM DECEMBER 1, 2024 THROUGH AND INCLUDING FEBRUARY 28, 2025**

Upon consideration of the Third Interim Fee Application (the “Application”)<sup>1</sup> of Blank Rome LLP (“Blank Rome”), special insurance counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), for the period from December 1, 2024, through and including February 28, 2025 (the “Third Interim Application Period”); and the Court having reviewed the Application and the Monthly Statements that were served by Blank Rome during the Second Interim Application Period, and finding that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining that proper and adequate notice has been given and that no other or further notice is necessary; and after due deliberation thereon; and good and

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

sufficient cause appearing therefore,

IT IS HEREBY ORDERED that:

1. The Application is GRANTED.
2. Blank Rome is allowed interim compensation in the amount of \$30,845.70 and reimbursement of expenses in the amount of \$0.00 for the Third Interim Application Period as requested in the Application.
3. The Debtor is authorized and directed to disburse to Blank Rome payment in the amount of the difference between the allowed amounts and the actual monthly payments previously received by Blank Rome for fees and expenses incurred during the Third Interim Application Period.
4. The Debtor is authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.
5. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.
6. This Order shall be effective immediately upon entry.

Dated: \_\_\_\_\_, 2025

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UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Henry P. (Toby) Long, III

Tyler P. Brown (VSB No. 28072)

Henry P. (Toby) Long, III (VSB No. 75134)

**HUNTON ANDREWS KURTH LLP**

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[hlong@HuntonAK.com](mailto:hlong@HuntonAK.com)

- and -

Joseph P. Rovira (admitted *pro hac vice*)

Catherine A. Rankin (admitted *pro hac vice*)

**HUNTON ANDREWS KURTH LLP**

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Houston, TX 77002

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Email: [josephrovira@HuntonAK.com](mailto:josephrovira@HuntonAK.com)

[crankin@HuntonAK.com](mailto:crankin@HuntonAK.com)

*Counsel for the Debtor and Debtor in Possession*

**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/ Henry P. (Toby) Long, III

Henry P. (Toby) Long, III

**EXHIBIT A**

**Professionals Rendering Services**  
December 1, 2024 – February 28, 2025

<b>Name of 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>
Kyle Brinkman	Partner	2010	Insurance Recovery	895.5	32.6	\$30,845.70
<b>Total:</b>					<b>32.6</b>	<b>\$30,845.70</b>
<b>Blended Rate:</b>						<b>\$946.19</b>

**EXHIBIT B**

**COMPENSATION BY PROJECT CATEGORY**

December 1, 2024 – February 28, 2025

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
B160	Fee/Employment Applications	1.8	\$1,709.10
B190	Other Contested Matters excluding assumption/rejection motions)	30.8	\$29,136.60
<b>TOTAL</b>		<b>32.6</b>	<b>\$30,845.70</b>



**EXHIBIT C**

**EXPENSE SUMMARY**

December 1, 2024 – February 28, 2025

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Unit Cost (if applicable)</b>	<b>Total Expenses</b>
N/A			
		<b>Total:</b>	<b>N/A</b>

**EXHIBIT D**

**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**

(December 1, 2024 – February 23, 2025)

<b>Category of Timekeeper</b>	<b>Blended Hourly Rate<sup>1</sup></b>	
	<b>Billed</b> (Firm for preceding year, excluding the Bankruptcy, Restructuring and Creditors' Rights group )	<b>Billed</b> (This Application)
All Partners (Equity Partner)	\$820	<b>\$946.19</b>
Counsel	\$685	N/A
Associate (7+ years)	\$605	N/A
Associate (4-6)	\$565	N/A
Associate (1-3)	\$505	N/A
Paralegal	\$330	N/A
<b>Aggregated (Blended Rates):</b>	<b>\$585</b>	<b>\$946.19</b>

<sup>1</sup> Consistent with ¶ C.3 of the Appendix B Guidelines, the blended hourly rates set forth in Exhibit D are calculated by dividing the dollar value of hours billed by the number of hours billed for the relevant timekeepers during the applicable time period. Exhibit D also segregates the timekeepers by rank using the categories set forth in Exhibit A to the Appendix B Guidelines. The data for the “preceding year” is based on information from Blank Rome’s last completed calendar year ending December 31, 2023.

In addition, as requested by ¶ C.3 of the Appendix B Guidelines, the blended hourly rates identified in Exhibit D for non-bankruptcy domestic timekeepers at Blank Rome includes discounted or alternative engagements, other than pro bono engagements and engagements for clients who are employees or charitable organizations that are billed at materially discounted rates.

**EXHIBIT E**

**BUDGET**  
**BLANK ROME LLP**  
(December 1, 2024 – February 28, 2025)

<b>Period</b>	<b>Estimated Fees</b>
December 1, 2024 – February 28, 2025	\$39,000

**STAFFING PLAN**  
**BLANK ROME LLP**  
(December 1, 2024 – February 28, 2025)

<b>Category of Timekeeper (as maintained by the firm)</b>	<b>Number of Timekeepers Expected to Work on the Matter During the Budgeted Period</b>	<b>Average Hourly Rate</b>
Partners	1	\$976.50
Counsel	0	N/A
Associates	0	N/A
Paralegal	0	N/A

**EXHIBIT F**

**BLANK ROME LLP**  
 Kyle P. Brinkman  
 1825 Eye Street NW  
 Washington DC 20006  
 Telephone: (202) 420-2200

*Special Insurance Counsel for Debtor and Debtor in Possession*

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

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<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>HOPEMAN BROTHERS, INC.,</b>	:	<b>Case No. 24-32428 (KLP)</b>
	:	
<b>Debtor.</b>	:	
	:	

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**FIFTH MONTHLY FEE STATEMENT OF BLANK ROME LLP  
 AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR FOR ALLOWANCE OF  
 COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED FROM DECEMBER 1 THROUGH DECEMBER 31, 2024**

Name of Applicant:	Blank Rome LLP
Name of Client:	Hopeman Brothers, Inc. Debtor and Debtor in Possession
Date of retention order entered:	September 9, 2024, effective as of June 30, 2024 [Docket No. 164]
Time Period Covered:	December 1 through December 31, 2024
Total Fees Requested:	\$8,740.08 (80% of \$10,925.10)
Total Expenses Requested:	\$0.00
Type of Fee Statement:	Monthly <sup>1</sup>

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<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 described in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.



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 Bankruptcy 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”), the law firm of Blank Rome LLP, special insurance counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), hereby submits this monthly fee statement (the “Monthly Fee Statement”) for the allowance of compensation for the reasonable and necessary legal services rendered by Blank Rome for the period from December 1 through December 31, 2024 (the “Fee Period”) and reimbursement of the actual and necessary expenses that Blank Rome LLP incurred during the Fee Period. By this Monthly Fee Statement, Blank Rome seeks allowance of compensation for services rendered in the amount of \$10,925.10 and payment in the amount of \$8,740.08 (which equals 80% of the compensation sought herein). Blank Rome incurred no expenses during the Fee Period and therefore does not seek allowance and reimbursement of actual and necessary expenses pursuant to this Monthly Fee Statement.

**Itemization of Services Rendered and Disbursements Incurred**

1. In support of this Monthly Fee Statement, Blank Rome has attached the following:
  - **Exhibit A** is a summary schedule of hours and fees covered by this Monthly Fee Statement, categorized by project code.
  - **Exhibit B** is a summary schedule of the time expended by all Blank Rome professionals and paraprofessionals engaged in the representation of the Debtor during the Fee Period.
  - **Exhibit C** is a summary of the expenses incurred by Blank Rome during the Fee Period.

- **Exhibit D** is a detailed invoice for the hours expended and fees incurred by Blank Rome 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. Blank Rome 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 Bankruptcy 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.

WHEREFORE, Blank Rome respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$8,740.08 consisting of (i) \$8,740.08, which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Blank Rome during the Fee Period, and (ii) \$0.00 for actual and necessary costs and expenses.

*[Remainder of Page Left Blank Intentionally]*



Dated: January 23, 2025  
Washington DC

/s/ Kyle P. Brinkman

Kyle P. Brinkman  
1825 Eye Street NW  
Washington DC 20006  
Telephone: (202) 420-2200

*Special Insurance Counsel for Debtor and Debtor in Possession*

Electronically filed by:

/s/ Henry P. (Toby) Long, III

Henry P. (Toby) Long, III (VSB No. 75134)  
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Richmond, Virginia 23219  
Telephone: (804) 788-8200  
Email: hlong@huntonak.com

*Counsel to the Debtor and Debtor in Possession*

**EXHIBIT A**

**Statement of Fees by Subject Matter during the Fee Period**

<b>Matter Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
B160	Fee/Employment Applications	0.6	\$537.30
B190	Other Contested Matters excluding assumption/rejection motions)	11.6	\$10,387.80
<b>TOTAL</b>		<b>12.2</b>	<b>\$10,925.10</b>

**EXHIBIT B**

**Professionals Rendering Services during the Fee Period**

The Blank Rome attorneys who rendered professional services in these cases 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>
Kyle Brinkman	Partner	2010	Insurance Recovery	895.5	12.2	\$10,925.10
<b>Totals</b>					12.2	\$10,925.10

Blank Rome paraprofessionals who rendered professional services in these cases 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>
N/A				0	0
<b>Totals</b>				0	0

**EXHIBIT C**

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

Type	Expenses
N/A	0
<b>TOTAL EXPENSES:</b>	<b>0</b>

**EXHIBIT D**

**Detailed Invoice of Fees and Expenses Incurred During the Fee Period**

Document Page 30 of 139  
**BLANKROME**

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

HOPEMAN BROTHERS, INC.  
 ATTN: CHRISTOPHER LASCELL  
 6 AUBURN COURT  
 BROOKLINE, MA 02446-6380

INVOICE DATE: JANUARY 13, 2025  
 CLIENT ID: 200433  
 MATTER NUMBER: 200433-00003 03358  
 INVOICE NUMBER: 2249528

**REGARDING: HOPEMAN BROTHERS  
 INSURANCE ADVICE - BANKRUPTCY**

DATE	INVOICE	AMOUNT	CREDITS	BALANCE
10/10/2024	2228873	\$26,238.15	\$0.00	\$26,238.15
11/08/2024	2235663	\$23,372.55	\$0.00	\$23,372.55
12/18/2024	2246604	\$15,492.15	\$0.00	\$15,492.15
<b>BALANCE FORWARD</b>				<b>\$65,102.85</b>
FOR LEGAL SERVICES RENDERED THROUGH 12/31/24			\$10,925.10	
<b>CURRENT INVOICE TOTAL</b>				<b>\$10,925.10</b>
<b>TOTAL AMOUNT DUE, INCLUDING BALANCE FORWARD</b>				<b>\$76,027.95</b>

REMITTANCE

	<b>ACH/WIRE</b>	<b>Mail</b>
Bank Name	Citizens Bank	Blank Rome LLP
Address:	Philadelphia, PA	Attn: Finance Department
Account Title:	Blank Rome LLP	One Logan Square
Account Number:	6238669326	130 North 18 <sup>th</sup> St
ABA Number:	036076150 (Domestic)	Philadelphia, PA 19103-6998
Swift Code	CTZIUS33 (International)	

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

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**BLANKROME**

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

HOPEMAN BROTHERS, INC.  
 ATTN: CHRISTOPHER LASCELL  
 6 AUBURN COURT  
 BROOKLINE, MA 02446-6380

INVOICE DATE: JANUARY 13, 2025  
 CLIENT ID: 200433  
 MATTER NUMBER: 200433-00003  
 INVOICE NUMBER: 2249528  
 PAGE 1

**REGARDING: HOPEMAN BROTHERS  
 INSURANCE ADVICE - BANKRUPTCY**

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

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
<b>TASK: B160 FEE/EMPLOYMENT APPLICATIONS</b>					
12/03/24	DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING NEXT MONTHLY AND INTERIM FEE STATEMENTS	K. BRINKMAN	B160	0.10	89.55
12/09/24	DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING BLANK ROME'S MONTHLY FEE APPLICATION	K. BRINKMAN	B160	0.10	89.55
12/17/24	DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING BLANK ROME'S MONTHLY FEE STATEMENT	K. BRINKMAN	B160	0.10	89.55
12/18/24	DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING BLANK ROME'S MONTHLY FEE STATEMENT	K. BRINKMAN	B160	0.10	89.55
12/18/24	REVISE DRAFT MONTHLY FEE STATEMENT OF BLANK ROME LLP	K. BRINKMAN	B160	0.10	89.55
12/19/24	DRAFT EMAIL CORRESPONDENCE TO C. RANKIN AND T. LONG REGARDING BLANK ROME'S MONTHLY FEE STATEMENT	K. BRINKMAN	B160	0.10	89.55
<b>TOTALS FOR B160 FEE/EMPLOYMENT APPLICATIONS</b>				<b>0.60</b>	<b>537.30</b>
<b>TASK: B190 OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION)</b>					
12/04/24	ANALYZE INSURANCE SETTLEMENT AGREEMENTS TO RESPOND TO INQUIRY FROM T. LONG (.3); DRAFT EMAIL CORRESPONDENCE TO T. LONG REGARDING ANALYSIS OF INSURANCE SETTLEMENT AGREEMENTS (.1); ANALYZE STRATEGY REGARDING POTENTIAL SETTLEMENT FUND (.2); DRAFT EMAIL	K. BRINKMAN	B190	0.80	716.40

HOPEMAN BROTHERS  
 FILE NUMBER: 200433-00003

PAGE 2  
 INVOICE # 2249528  
 JANUARY 13, 2025

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
	CORRESPONDENCE TO T. BROWN, J. ROVIRA, AND R. VAN EPPS REGARDING POTENTIAL SETTLEMENT FUND (.2)				
12/05/24	DRAFT EMAIL CORRESPONDENCE TO T. LONG IN RESPONSE TO INQUIRY REGARDING PRIOR SETTLEMENTS WITH CHUBB AND OTHER SETTLING INSURERS (.2); ANALYZE PRIOR SETTLEMENTS WITH CHUBB AND OTHER SETTLING INSURERS TO RESPOND TO INQUIRY FROM T. LONG (.3)	K. BRINKMAN	B190	0.50	447.75
12/06/24	PERFORM LEGAL RESEARCH AND ANALYZE CASE LAW TO RESPOND TO INQUIRY FROM C. RANKIN REGARDING CREDITOR OPPOSITION ARGUMENTS TO CONFIRMATION OF INSURANCE SETTLEMENT (1.3); ANALYZE POTENTIAL RESPONSIVE ARGUMENTS (.5); DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING RESEARCH RESULTS AND POTENTIAL RESPONSIVE ARGUMENTS FOR REPLY IN RESPONSE TO CREDITOR OPPOSITION ARGUMENTS TO CONFIRMATION OF INSURANCE SETTLEMENT (.6)	K. BRINKMAN	B190	2.40	2,149.20
12/09/24	PERFORM LEGAL RESEARCH TO SUPPORT REPLY IN SUPPORT OF MOTION TO APPROVE INSURANCE SETTLEMENT (.5); DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING RESULTS OF LEGAL RESEARCH (.1); DRAFT EMAIL CORRESPONDENCE TO T. LONG REGARDING DEBTOR'S DOCUMENT PRODUCTIONS IN CONNECTION WITH MOTIONS TO APPROVE INSURANCE SETTLEMENTS (.2); ANALYZE DOCUMENTS COLLECTED FOR DEBTOR'S DOCUMENT PRODUCTIONS IN CONNECTION WITH MOTIONS FOR APPROVAL OF INSURANCE SETTLEMENTS (.2)	K. BRINKMAN	B190	1.00	895.50
12/10/24	DRAFT EMAIL CORRESPONDENCE TO T. LONG AND C. RANKIN REGARDING MOTIONS TO APPROVE INSURANCE SETTLEMENTS (.2); REVISE DRAFT REPLY ARGUMENTS IN	K. BRINKMAN	B190	0.80	716.40



HOPEMAN BROTHERS  
 FILE NUMBER: 200433-00003

PAGE 3  
 INVOICE # 2249528  
 JANUARY 13, 2025

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
	CONNECTION WITH MOTIONS TO APPROVE INSURANCE SETTLEMENTS (.6)				
12/11/24	DRAFT EMAIL CORRESPONDENCE TO T. BROWN AND J. ROVIRA REGARDING HEARING ON MOTION FOR INSURANCE SETTLEMENT APPROVAL	K. BRINKMAN	B190	0.20	179.10
12/12/24	ANALYZE CORRESPONDENCE FROM T. BROWN AND J. ROVIRA REGARDING STATUS, PREPARATION, AND STRATEGY FOR HEARING ON MOTION TO APPROVE INSURANCE SETTLEMENT	K. BRINKMAN	B190	0.30	268.65
12/16/24	PREPARE FOR AND ATTEND BY REMOTE APPEARANCE MOTION HEARING ON JOINT MOTION OF THE DEBTOR AND COMMITTEE FOR ENTRY OF AN ORDER AUTHORIZING MEDIATION OF THE CHUBB INSURERS SETTLEMENT MOTION [DOCKET NO. 419] AND MOTION OF THE DEBTOR FOR ENTRY OF AN ORDER (I) APPROVING THE SETTLEMENT AGREEMENT AND RELEASE BETWEEN THE DEBTOR AND CERTAIN SETTLING INSURERS; (II) APPROVING THE SALE OF CERTAIN INSURANCE POLICIES; (III) ISSUING AN INJUNCTION PURSUANT TO THE SALE OF CERTAIN INSURANCE POLICIES; AND (IV) GRANTING RELATED RELIEF [DOCKET NO. 53]	K. BRINKMAN	B190	5.20	4,656.60
12/19/24	DRAFT EMAIL CORRESPONDENCE TO C. LASCELL, K. COURINGTON, R. VAN EPPS, AND HUNTON AK TEAM REGARDING POTENTIAL MEDIATION (.2); PLAN AND PREPARE FOR POTENTIAL MEDIATION OF CHUBB INSURANCE SETTLEMENT APPROVAL MOTION DISPUTES (.2)	K. BRINKMAN	B190	0.40	358.20
	<b>TOTALS FOR B190 OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION)</b>			<b>11.60</b>	<b>10,387.80</b>
	<b>TOTAL SERVICES</b>				<b>\$10,925.10</b>

CURRENT INVOICE TOTAL

**\$10,925.10**

HOPEMAN BROTHERS  
FILE NUMBER: 200433-00003

PAGE 4  
INVOICE # 2249528  
JANUARY 13, 2025

**TIME AND FEE SUMMARY**

<b>TIMEKEEPER</b>	<b>RATE</b>	<b>HOURS</b>	<b>FEES</b>
KYLE BRINKMAN	895.50	12.20	10,925.10
<b>TOTALS</b>		<b>12.20</b>	<b>\$10,925.10</b>

**BLANK ROME LLP**  
 Kyle P. Brinkman  
 1825 Eye Street NW  
 Washington DC 20006  
 Telephone: (202) 420-2200

*Special Insurance Counsel for Debtor and Debtor in Possession*

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

---

<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>HOPEMAN BROTHERS, INC.,</b>	:	<b>Case No. 24-32428 (KLP)</b>
	:	
<b>Debtor.</b>	:	
	:	
	:	

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**SIXTH MONTHLY FEE STATEMENT OF BLANK ROME LLP  
 AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR FOR ALLOWANCE OF  
 COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED FROM JANUARY 1 THROUGH JANUARY 31, 2025**

Name of Applicant:	Blank Rome LLP
Name of Client:	Hopeman Brothers, Inc. Debtor and Debtor in Possession
Date of retention order entered:	September 9, 2024, effective as of June 30, 2024 [Docket No. 164]
Time Period Covered:	January 1 through January 31, 2025
Total Fees Requested:	\$1,328.04 (80% of \$1,660.05)
Total Expenses Requested:	\$0.00
Type of Fee Statement:	Monthly <sup>1</sup>

<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 described in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.



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 Bankruptcy 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”), the law firm of Blank Rome LLP, special insurance counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), hereby submits this monthly fee statement (the “Monthly Fee Statement”) for the allowance of compensation for the reasonable and necessary legal services rendered by Blank Rome for the period from January 1 through January 31, 2025 (the “Fee Period”) and reimbursement of the actual and necessary expenses that Blank Rome LLP incurred during the Fee Period. By this Monthly Fee Statement, Blank Rome seeks allowance of compensation for services rendered in the amount of \$1,660.05 and payment in the amount of \$1,328.04 (which equals 80% of the compensation sought herein). Blank Rome incurred no expenses during the Fee Period and therefore does not seek allowance and reimbursement of actual and necessary expenses pursuant to this Monthly Fee Statement.

**Itemization of Services Rendered and Disbursements Incurred**

1. In support of this Monthly Fee Statement, Blank Rome has attached the following:
  - **Exhibit A** is a summary schedule of hours and fees covered by this Monthly Fee Statement, categorized by project code.
  - **Exhibit B** is a summary schedule of the time expended by all Blank Rome professionals and paraprofessionals engaged in the representation of the Debtor during the Fee Period.
  - **Exhibit C** is a summary of the expenses incurred by Blank Rome during the Fee Period.

- **Exhibit D** is a detailed invoice for the hours expended and fees incurred by Blank Rome 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. Blank Rome 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 Bankruptcy 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.

WHEREFORE, Blank Rome respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$1,328.04 consisting of (i) \$1,328.04, which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Blank Rome during the Fee Period, and (ii) \$0.00 for actual and necessary costs and expenses.

Dated: February 24, 2025  
Washington DC

/s/ Kyle P. Brinkman

Kyle P. Brinkman  
1825 Eye Street NW  
Washington DC 20006  
Telephone: (202) 420-2200

*Special Insurance Counsel for Debtor and Debtor in Possession*

Electronically filed by:

/s/ Henry P. (Toby) Long, III

Henry P. (Toby) Long, III (VSB No. 75134)  
Hunton Andrews Kurth LLP  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219  
Telephone: (804) 788-8200  
Email: hlong@huntonak.com

*Counsel to the Debtor and Debtor in Possession*

**EXHIBIT A**

**Statement of Fees by Subject Matter during the Fee Period**

<b>Matter Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
B160	Fee/Employment Applications	0.9	\$878.85
B190	Other Contested Matters excluding assumption/rejection motions)	0.8	\$781.20
<b>TOTAL</b>		<b>1.7</b>	<b>\$1,660.05</b>

**EXHIBIT B**

**Professionals Rendering Services during the Fee Period**

The Blank Rome attorneys who rendered professional services in these cases 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>
Kyle Brinkman	Partner	2010	Insurance Recovery	976.50	1.70	\$1,660.05
<b>Totals</b>					1.70	\$1,660.05

Blank Rome paraprofessionals who rendered professional services in these cases 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>
N/A				0	0
<b>Totals</b>				0	0



**EXHIBIT C**

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

Type	Expenses
N/A	0
<b>TOTAL EXPENSES:</b>	<b>0</b>

**EXHIBIT D**

**Detailed Invoice of Fees and Expenses Incurred During the Fee Period**

Document Page 43 of 159  
**BLANKROME**

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

HOPEMAN BROTHERS, INC.  
 ATTN: CHRISTOPHER LASCELL  
 6 AUBURN COURT  
 BROOKLINE, MA 02446-6380

INVOICE DATE: FEBRUARY 20, 2025  
 CLIENT ID: 200433  
 MATTER NUMBER: 200433-00003 03358  
 INVOICE NUMBER: 2259192

**REGARDING: HOPEMAN BROTHERS  
 INSURANCE ADVICE - BANKRUPTCY**

DATE	INVOICE	AMOUNT	CREDITS	BALANCE
10/10/2024	2228873	\$26,238.15	\$0.00	\$26,238.15
11/08/2024	2235663	\$23,372.55	\$0.00	\$23,372.55
12/18/2024	2246604	\$15,492.15	\$0.00	\$15,492.15
01/13/2025	2249528	\$10,925.10	\$0.00	\$10,925.10
<b>BALANCE FORWARD</b>				<b>\$76,027.95</b>
FOR LEGAL SERVICES RENDERED THROUGH 1/31/25			\$1,660.05	
<b>CURRENT INVOICE TOTAL</b>				<b>\$1,660.05</b>
<b>TOTAL AMOUNT DUE, INCLUDING BALANCE FORWARD</b>				<b>\$77,688.00</b>

REMITTANCE

	<b>ACH/WIRE</b>	<b>Mail</b>
Bank Name	Citizens Bank	Blank Rome LLP
Address:	Philadelphia, PA	Attn: Finance Department
Account Title:	Blank Rome LLP	One Logan Square
Account Number:	6238669326	130 North 18 <sup>th</sup> St
ABA Number:	036076150 (Domestic)	Philadelphia, PA 19103-6998
Swift Code	CTZIUS33 (International)	

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

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

HOPEMAN BROTHERS, INC.  
 ATTN: CHRISTOPHER LASCELL  
 6 AUBURN COURT  
 BROOKLINE, MA 02446-6380

INVOICE DATE: FEBRUARY 20, 2025  
 CLIENT ID: 200433  
 MATTER NUMBER: 200433-00003  
 INVOICE NUMBER: 2259192  
 PAGE 1

**REGARDING: HOPEMAN BROTHERS  
 INSURANCE ADVICE - BANKRUPTCY**

**FOR LEGAL SERVICES RENDERED THROUGH JANUARY 31, 2025**

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
<b>TASK: B160 FEE/EMPLOYMENT APPLICATIONS</b>					
01/13/25	DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING SECOND INTERIM FEE APPLICATION (.2); PREPARE FOR AND PARTICIPATE IN TELECONFERENCE WITH C. RANKIN REGARDING SECOND INTERIM FEE APPLICATION (.1); REVIEW AND REVISE DRAFT SECOND INTERIM FEE APPLICATION (.4)	K. BRINKMAN	B160	0.70	683.55
01/15/25	REVIEW AND REVISE BLANK ROME'S FIFTH MONTHLY FEE STATEMENT SUBMISSION (.1); DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING BLANK ROME'S FIFTH MONTHLY FEE STATEMENT SUBMISSION (.1)	K. BRINKMAN	B160	0.20	195.30
<b>TOTALS FOR B160 FEE/EMPLOYMENT APPLICATIONS</b>				<b>0.90</b>	<b>878.85</b>
<b>TASK: B190 OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION)</b>					
01/13/25	PREPARE FOR AND CONFER WITH C. RANKIN REGARDING STRATEGY AND PREPARATION FOR MEDIATION OF CHUBB SETTLEMENT AGREEMENT DISPUTE (.3); ANALYSIS REGARDING MEDIATION OF CHUBB SETTLEMENT AGREEMENT DISPUTE (.2)	K. BRINKMAN	B190	0.50	488.25
01/22/25	DRAFT EMAIL CORRESPONDENCE IN RESPONSE TO INQUIRY FROM P. SANTELLE FOR CHUBB (.1); DRAFT EMAIL CORRESPONDENCE TO T. BROWN AND J. ROVIRA REGARDING SAME (.1); ANALYZE STATUS AND STRATEGY IN CONNECTION WITH CHUBB	K. BRINKMAN	B190	0.30	292.95

HOPEMAN BROTHERS  
 FILE NUMBER: 200433-00003

PAGE 2  
 INVOICE # 2259192  
 FEBRUARY 20, 2025

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
	SETTLEMENT MOTION AND RELATED MEDIATION (.1)				
	<b>TOTALS FOR B190 OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION)</b>			<b>0.80</b>	<b>781.20</b>
	<b>TOTAL SERVICES</b>				<b>\$1,660.05</b>

**CURRENT INVOICE TOTAL** \$1,660.05

**TIME AND FEE SUMMARY**

TIMEKEEPER	RATE	HOURS	FEEES
KYLE BRINKMAN	976.50	1.70	1,660.05
<b>TOTALS</b>		<b>1.70</b>	<b>\$1,660.05</b>

**BLANK ROME LLP**  
 Kyle P. Brinkman  
 1825 Eye Street NW  
 Washington DC 20006  
 Telephone: (202) 420-2200

*Special Insurance Counsel for Debtor and Debtor in Possession*

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

---

<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>HOPEMAN BROTHERS, INC.,</b>	:	<b>Case No. 24-32428 (KLP)</b>
	:	
<b>Debtor.</b>	:	
	:	
	:	

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**SEVENTH MONTHLY FEE STATEMENT OF BLANK ROME LLP  
 AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR FOR ALLOWANCE OF  
 COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED FROM FEBRUARY 1 THROUGH FEBRUARY 28, 2025**

Name of Applicant:	Blank Rome LLP
Name of Client:	Hopeman Brothers, Inc. Debtor and Debtor in Possession
Date of retention order entered:	September 9, 2024, effective as of June 30, 2024 [Docket No. 164]
Time Period Covered:	February 1 through February 28, 2025
Total Fees Requested:	\$14,608.44 (80% of \$18,260.55)
Total Expenses Requested:	\$0.00
Type of Fee Statement:	Monthly <sup>1</sup>

<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 described in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.



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 Bankruptcy 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”), the law firm of Blank Rome LLP, special insurance counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), hereby submits this monthly fee statement (the “Monthly Fee Statement”) for the allowance of compensation for the reasonable and necessary legal services rendered by Blank Rome for the period from February 1 through February 28, 2025 (the “Fee Period”) and reimbursement of the actual and necessary expenses that Blank Rome LLP incurred during the Fee Period. By this Monthly Fee Statement, Blank Rome seeks allowance of compensation for services rendered in the amount of \$18,260.55 and payment in the amount of \$14,608.44 (which equals 80% of the compensation sought herein). Blank Rome incurred no expenses during the Fee Period and therefore does not seek allowance and reimbursement of actual and necessary expenses pursuant to this Monthly Fee Statement.

**Itemization of Services Rendered and Disbursements Incurred**

1. In support of this Monthly Fee Statement, Blank Rome has attached the following:
  - **Exhibit A** is a summary schedule of hours and fees covered by this Monthly Fee Statement, categorized by project code.
  - **Exhibit B** is a summary schedule of the time expended by all Blank Rome professionals and paraprofessionals engaged in the representation of the Debtor during the Fee Period.
  - **Exhibit C** is a summary of the expenses incurred by Blank Rome during the Fee Period.

- **Exhibit D** is a detailed invoice for the hours expended and fees incurred by Blank Rome 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. Blank Rome 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 Bankruptcy 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.

WHEREFORE, Blank Rome respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$14,608.44 consisting of (i) \$14,608.44, which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Blank Rome during the Fee Period, and (ii) \$0.00 for actual and necessary costs and expenses.

*[Remainder of Page Intentionally Left Blank]*



Dated: March 31, 2025  
Washington DC

/s/ Kyle P. Brinkman

Kyle P. Brinkman  
1825 Eye Street NW  
Washington DC 20006  
Telephone: (202) 420-2200

*Special Insurance Counsel for Debtor and Debtor in Possession*

Electronically filed by:

/s/ Henry P. (Toby) Long, III

Henry P. (Toby) Long, III (VSB No. 75134)  
Hunton Andrews Kurth LLP  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219  
Telephone: (804) 788-8200  
Email: hlong@huntonak.com

*Counsel to the Debtor and Debtor in Possession*

**EXHIBIT A**

**Statement of Fees by Subject Matter during the Fee Period**

<b>Matter Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
B160	Fee/Employment Applications	0.3	\$292.95
B190	Other Contested Matters excluding assumption/rejection motions)	18.4	\$17,967.60
<b>TOTAL</b>		<b>18.7</b>	<b>\$18,260.55</b>

**EXHIBIT B**

**Professionals Rendering Services during the Fee Period**

The Blank Rome attorneys who rendered professional services in these cases 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>
Kyle Brinkman	Partner	2010	Insurance Recovery	976.50	18.70	\$18,260.55
<b>Totals</b>					18.70	\$18,260.55

Blank Rome paraprofessionals who rendered professional services in these cases 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>
N/A				0	0
<b>Totals</b>				0	0

**EXHIBIT C**

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

Type	Expenses
N/A	0
<b>TOTAL EXPENSES:</b>	<b>0</b>

**EXHIBIT D**

**Detailed Invoice of Fees and Expenses Incurred During the Fee Period**

Document Page 54 of 59  
**BLANKROME**

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

HOPEMAN BROTHERS, INC.  
 ATTN: CHRISTOPHER LASCELL  
 6 AUBURN COURT  
 BROOKLINE, MA 02446-6380

INVOICE DATE: MARCH 20, 2025  
 CLIENT ID: 200433  
 MATTER NUMBER: 200433-00003 03358  
 INVOICE NUMBER: 2266169

**REGARDING: HOPEMAN BROTHERS  
 INSURANCE ADVICE - BANKRUPTCY**

DATE	INVOICE	AMOUNT	CREDITS	BALANCE
10/10/2024	2228873	\$26,238.15	\$0.00	\$26,238.15
11/08/2024	2235663	\$23,372.55	\$0.00	\$23,372.55
12/18/2024	2246604	\$15,492.15	\$0.00	\$15,492.15
01/13/2025	2249528	\$10,925.10	\$0.00	\$10,925.10
02/20/2025	2259192	\$1,660.05	\$0.00	\$1,660.05
<b>BALANCE FORWARD</b>				<b>\$77,688.00</b>
FOR LEGAL SERVICES RENDERED THROUGH 2/28/25			\$18,260.55	
<b>CURRENT INVOICE TOTAL</b>				<b>\$18,260.55</b>
<b>TOTAL AMOUNT DUE, INCLUDING BALANCE FORWARD</b>				<b>\$95,948.55</b>

REMITTANCE

	<b>ACH/WIRE</b>	<b>Mail</b>
Bank Name	Citizens Bank	Blank Rome LLP
Address:	Philadelphia, PA	Attn: Finance Department
Account Title:	Blank Rome LLP	One Logan Square
Account Number:	6238669326	130 North 18 <sup>th</sup> St
ABA Number:	036076150 (Domestic)	Philadelphia, PA 19103-6998
Swift Code	CTZIUS33 (International)	

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

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**BLANKROME**

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**REGARDING: HOPEMAN BROTHERS  
 INSURANCE ADVICE - BANKRUPTCY**

**FOR LEGAL SERVICES RENDERED THROUGH FEBRUARY 28, 2025**

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
<b>TASK: B160 FEE/EMPLOYMENT APPLICATIONS</b>					
02/18/25	DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING BLANK ROME'S MONTHLY FEE STATEMENT	K. BRINKMAN	B160	0.10	97.65
02/19/25	REVIEW AND REVISE BLANK ROME'S DRAFT MONTHLY FEE STATEMENT	K. BRINKMAN	B160	0.10	97.65
02/20/25	DRAFT EMAIL CORRESPONDENCE TO C. RANKIN AND T. LONG REGARDING BLANK ROME'S MONTHLY FEE STATEMENT	K. BRINKMAN	B160	0.10	97.65
<b>TOTALS FOR B160 FEE/EMPLOYMENT APPLICATIONS</b>				<b>0.30</b>	<b>292.95</b>
<b>TASK: B190 OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION)</b>					
02/04/25	ANALYZE UCC'S PROPOSED SETTLEMENT TERMS FOR CHUBB DISPUTE (.7); DRAFT EMAIL CORRESPONDENCE REGARDING SAME TO C. LASCELL, T. BROWN, J. ROVIRA, C. RANKIN, AND R. VAN EPPS (.2); PREPARE FOR AND PARTICIPATE IN TELECONFERENCE WITH C. LASCELL, T. BROWN, J. ROVIRA, C. RANKIN, AND R. VAN EPPS (.7)	K. BRINKMAN	B190	1.60	1,562.40
02/05/25	ANALYZE UCC'S PROPOSED SETTLEMENT TERMS FOR CHUBB DISPUTE	K. BRINKMAN	B190	0.30	292.95
02/06/25	ANALYZE HUNTON AK COMMENTS AND QUESTIONS REGARDING UCC'S PROPOSED SETTLEMENT TERMS FOR CHUBB DISPUTE (.3); DRAFT EMAIL CORRESPONDENCE TO C. LASCELL, R. VAN EPPS, T. BROWN, J. ROVIRA, AND P. BARRETT REGARDING SAME (.2)	K. BRINKMAN	B190	0.50	488.25

HOPEMAN BROTHERS  
 FILE NUMBER: 200433-00003

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 INVOICE # 2266169  
 MARCH 20, 2025

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
02/07/25	ANALYZE HUNTON AK COMMENTS AND QUESTIONS REGARDING UCC'S PROPOSED SETTLEMENT TERMS FOR CHUBB DISPUTE (.7); DRAFT EMAIL CORRESPONDENCE TO C. LASCELL, R. VAN EPPS, T. BROWN, J. ROVIRA, AND P. BARRETT REGARDING SAME (.2); PREPARE FOR AND PARTICIPATE IN MEDIATION TELECONFERENCE WITH JUDGE HUENNEKENS, C. LASCELL, R. VAN EPPS, T. BROWN, P. BARRETT (.7)	K. BRINKMAN	B190	1.60	1,562.40
02/10/25	ANALYZE RESPONSE FROM J. LIESEMER REGARDING MEDIATION OF CHUBB DISPUTE (.1); ANALYSIS REGARDING MEDIATION OF CHUBB DISPUTE (.2); DRAFT EMAIL CORRESPONDENCE TO T. BROWN REGARDING MEDIATION (.1)	K. BRINKMAN	B190	0.40	390.60
02/11/25	PLAN AND PREPARE FOR FURTHER MEDIATION OF CHUBB DISPUTE	K. BRINKMAN	B190	0.20	195.30
02/12/25	PREPARE FOR AND PARTICIPATE IN MEDIATION SESSION WITH UCC REPRESENTATIVES, T. BROWN, J. ROVIRA, P. BARRETT, AND JUDGE HUENNEKENS REGARDING CHUBB DISPUTE	K. BRINKMAN	B190	1.70	1,660.05
02/13/25	PREPARE FOR AND PARTICIPATE IN TELECONFERENCE WITH C. LASCELL, R. VAN EPPS, T. BROWN, J. ROVIRA, AND C. RANKIN REGARDING STATUS AND STRATEGY (1.0); DRAFT EMAIL CORRESPONDENCE TO T. BROWN AND T. LONG (.1)	K. BRINKMAN	B190	1.10	1,074.15
02/13/25	ANALYZE CORRESPONDENCE FROM UCC COVERAGE COUNSEL D. COX REQUESTING TELECONFERENCE (.1); DRAFT EMAIL CORRESPONDENCE TO T. BROWN AND J. ROVIRA REGARDING SAME (.1)	K. BRINKMAN	B190	0.20	195.30
02/14/25	DRAFT EMAIL CORRESPONDENCE IN RESPONSE TO UCC COVERAGE COUNSEL D. COX (.1); ANALYZE CHUBB AGREEMENTS IN CONNECTION WITH SAME (.4)	K. BRINKMAN	B190	0.50	488.25
02/18/25	ANALYZE CORRESPONDENCE AMONG J. ROVIRA AND UCC	K. BRINKMAN	B190	2.60	2,538.90



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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
	COUNSEL REGARDING CONTINUING MEDIATION OF CHUBB DISPUTE (.2); ANALYZE REVISED DRAFT TERM SHEET RECEIVED FROM UCC COUNSEL (.3); ANALYZE LEGAL AUTHORITIES RECEIVED FROM UCC COUNSEL (.5); ANALYZE 2008 AND 2009 CHUBB COVERAGE-IN-PLACE AGREEMENTS (.4); DRAFT EMAIL CORRESPONDENCE TO HUNTON AK TEAM, C. LASCELL, R. VAN EPPS, D. RAMLJAK, AND P. BARRETT (.1); DRAFT EMAIL CORRESPONDENCE IN RESPONSE TO J. ROVIRA INQUIRY REGARDING ALLOCATION RULES APPLICABLE TO POLICIES (.3); ANALYZE POLICY AND PRIOR LITIGATION DOCUMENTS TO RESPOND TO J. ROVIRA INQUIRY (.8)				
02/19/25	PREPARE FOR AND PARTICIPATE IN TELECONFERENCE WITH C. LASCELL, R. VAN EPPS, D. RAMLJAK, T. BROWN, J. ROVIRA, C. RANKIN, T. LONG, P. BARRETT REGARDING STATUS AND STRATEGY FOR MEDIATION OF CHUBB DISPUTE (1.0); ANALYZE PROPOSED LIQUIDATION ANALYSIS AND ONGOING BUSINESS EVALUATION DOCUMENTS RECEIVED FROM UCC COUNSEL (.4); ANALYZE PROPOSED REVISIONS TO TERM SHEET FROM T. BROWN AND J. ROVIRA (.2); ANALYZE EMAILS AMONG J. ROVIRA AND UCC COUNSEL REGARDING TERM SHEET AND MEDIATION (.1)	K. BRINKMAN	B190	1.70	1,660.05
02/20/25	PREPARE FOR AND PARTICIPATE IN TELECONFERENCE WITH JUDGE HUENNEKENS, J. LIESEMER, T. PHILLIPS, N. MILLER, D. COX, B. EDWARDS, C. TULLY, T. BROWN, J. ROVIRA, P. BARRETT (.8); DRAFT EMAIL CORRESPONDENCE TO T. BROWN AND J. ROVIRA REGARDING SAME (.1); DRAFT EMAIL CORRESPONDENCE TO C. RANKIN REGARDING SAME (.1); DRAFT EMAIL CORRESPONDENCE TO C. LASCELL AND HUNTON AK TEAM	K. BRINKMAN	B190	1.10	1,074.15

HOPEMAN BROTHERS  
 FILE NUMBER: 200433-00003

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DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
	REGARDING IDENTIFICATION OF HOPEMAN VENDORS FOR TERM SHEET (.1)				
02/21/25	ANALYZE UPDATED PROPOSED TERM SHEET FOR UCC NEGOTIATIONS AND HUNTON AK COMMENTS REGARDING SAME	K. BRINKMAN	B190	0.40	390.60
02/22/25	ANALYZE UPDATED DRAFT LIQUIDATION ANALYSIS RECEIVED FROM UCC COUNSEL IN SUPPORT OF REVISED TERM SHEET	K. BRINKMAN	B190	0.30	292.95
02/24/25	DRAFT EMAIL CORRESPONDENCE TO C. LASCELL, R. VAN EPPS, D. RAMLJAK, T. BROWN, J. ROVIRA, C. RANKIN, P. BARRETT (.2); ANALYZE DRAFT LIQUIDATION ANALYSIS RECEIVED FROM UCC COUNSEL (.2); ANALYZE EMAIL CORRESPONDENCE FROM K. COURINGTON AND C. RANKIN REGARDING HOPEMAN VENDOR LIST FOR TERM SHEET (.1)	K. BRINKMAN	B190	0.50	488.25
02/25/25	PREPARE FOR AND PARTICIPATE IN TELECONFERENCE WITH C. LASCELL, R. VAN EPPS, D. RAMLJAK, T. BROWN REGARDING MEDIATION, DRAFT LIQUIDATION ANALYSIS, AND UCC TERM SHEET	K. BRINKMAN	B190	0.90	878.85
02/26/25	ANALYZE CORRESPONDENCE FROM D. GOODING (LIBERTY MUTUAL COUNSEL) AND ASSOCIATED COMMENTS FROM T. BROWN (.2); ANALYZE REVISED DRAFT TERM SHEET WITH UCC AND EXHIBIT THERETO (.2); DRAFT EMAIL CORRESPONDENCE TO C. LASCELL, R. VAN EPPS, D. RAMLJAK, T. BROWN, J. ROVIRA, C. RANKIN, T. LONG, AND P. BARRETT REGARDING DRAFT TERM SHEET WITH UCC (.2)	K. BRINKMAN	B190	0.60	585.90
02/27/25	PREPARE FOR AND PARTICIPATE IN MEDIATION TELECONFERENCE WITH JUDGE HUENNEKENS, T. PHILLIPS, N. MILLER, J. LIESEMER, J. RASKIN, D. COX, T. BROWN, J. ROVIRA, T. LONG, P. BARRETT (.5); ANALYZE ADDITIONAL PROPOSED TERM SHEET REVISIONS (.3)	K. BRINKMAN	B190	0.80	781.20
02/28/25	ANALYZE PROPOSED REVISIONS TO UCC TERM SHEET (.4); DRAFT	K. BRINKMAN	B190	1.40	1,367.10

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 MARCH 20, 2025

DATE	DESCRIPTION	TIMEKEEPER	CODE	HOURS	AMOUNT
	EMAIL CORRESPONDENCE TO T. BROWN, J. ROVIRA, AND P. BARRETT REGARDING MEDIATION SESSION WITH HII COUNSEL AND DRAFT UCC TERM SHEET (.3); ANALYZE EMAIL CORRESPONDENCE FROM J. ROVIRA AND K. COURINGTON REGARDING LOUISIANA CLAIMS PROCEDURES (.1); PREPARE FOR AND PARTICIPATE IN TELECONFERENCE WITH J. ROVIRA REGARDING MEDIATION CALL WITH HII COUNSEL (.2); ANALYZE EMAIL CORRESPONDENCE FROM J. LIESEMER AND N. MILLER REGARDING DRAFT UCC TERM SHEET (.2); ANALYZE EMAIL CORRESPONDENCE FROM K.E. SIEG, C. SYMONS, P. BARRETT, AND J. ROVIRA REGARDING DRAFT UCC TERM SHEET (.2)				
	<b>TOTALS FOR B190 OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION)</b>			<b>18.40</b>	<b>17,967.60</b>
	<b>TOTAL SERVICES</b>				<b>\$18,260.55</b>

**CURRENT INVOICE TOTAL** \$18,260.55

**TIME AND FEE SUMMARY**

TIMEKEEPER	RATE	HOURS	FEES
KYLE BRINKMAN	976.50	18.70	18,260.55
<b>TOTALS</b>		<b>18.70</b>	<b>\$18,260.55</b>