

**TROUTMAN PEPPER LOCKE LLP**

Dabney J. Carr (VSB No. 28679)  
1001 Haxall Pt.  
Richmond, VA 23219  
Telephone: (804) 697-1200

Leslie A. Davis (admitted *pro hac vice*)  
Michael T. Carolan (*pro hac vice* motion pending)  
401 9<sup>th</sup> Street, NW  
Washington, DC 20004  
Telephone: (202) 274-2950

*Counsel for Century Indemnity Company and Westchester  
Fire Insurance Company*

**WHITE AND WILLIAMS LLP**

Patricia B. Santelle (admitted *pro hac vice*)  
1650 Market Street  
One Liberty Place, Suite 1800  
Philadelphia, PA 19103  
Telephone: (215) 864-7000

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

**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

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

**CHUBB INSURERS’ OBJECTION TO SEVENTH MONTHLY FEE STATEMENT OF  
CAPLIN & DRYSDALE, CHARTERED FOR ALLOWANCE OF COMPENSATION  
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED  
FOR THE PERIOD OF FEBRUARY 1, 2025 THROUGH FEBRUARY 28, 2025**

Century Indemnity Company and Westchester Fire Insurance Company (together, the “Chubb Insurers”), parties in interest, object to the Seventh Monthly Fee Statement of Caplin & Drysdale, Chartered for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from February 1, 2025 Through and Including February 28, 2025, Dkt. No. 647 (the “Caplin & Drysdale Fee Application”).

1. The Chubb Insurers object to the portions of the Caplin & Drysdale Fee Application reflecting work performed to prepare, analyze, and negotiate with Debtor and others regarding a §



524(g) plan. There is no question that Debtor is liquidating. As the Committee’s counsel represented to the Court in September 2024, “[t]here’s *nothing to rehabilitate here. There’s no operating business, no going concern to preserve, no jobs to save. This is a liquidating debtor.*” 9/10/24 Tr., p. 131:11-13 (emphasis added). Because Hopeman is liquidating, it is ineligible for a discharge under 11 U.S.C. § 1141. Because Debtor cannot obtain a discharge, it is necessarily ineligible for the “supplemental” discharge injunction of § 524(g). As a result, fees incurred by Debtor, the Committee, and their respective professionals in pursuit of a § 524(g) plan cannot be reasonably likely to benefit Debtor’s estate.

2. The grounds supporting the Chubb Insurers’ objections to the Caplin & Drysdale Fee Application are the same as those set forth in the Chubb Insurers’ Objection to 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 (Dkt. No. 645) (the “MLB Fee Application Objection”). Accordingly, the Chubb Insurers hereby incorporate by reference as though fully set forth herein the entirety of the MLB Fee Application Objection, except with respect to the specific hours and amounts of MLB fees identified in ¶ 29 of that objection.

3. According to the Caplin & Drysdale fee application, the firm billed a total of 205 hours between February 1 through February 28, 2025. *See* Dkt. No. 647, Ex. A. Caplin & Drysdale spent 158.7 hours on “term sheet”-related work, “mediation issues,” reviewing and analyzing “issues re 524(g) plan,” and the Committee’s liquidation analysis in connection with the § 524(g) term sheet. *See* Ex. A (highlighted time entries in Caplin & Drysdale’s application). Caplin & Drysdale’s fees associated with that work total \$181,868.00. The Chubb Insurers object to

allowance of those fees. For the reasons set forth in the MLB Fee Application Objection (Dkt. No. 645), these fees must be disallowed because they were incurred for services that were not “reasonably likely to benefit the debtor’s estate.” 11 U.S.C. § 330(a)(4)(A).

**CONCLUSION**

For the reasons set forth above and in the MLB Fee Application Objection, as incorporated herein, the Caplin & Drysdale Fee Application should be disallowed in the amount set forth in Paragraph 3.

Dated: April 21, 2025

Respectfully submitted,

/s/ Dabney J. Carr  
Dabney J. Carr (VSB No. 28679)  
TROUTMAN PEPPER LOCKE LLP  
1001 Haxall Pt.  
Richmond, VA 23219  
Telephone: (804) 697-1200  
[Dabney.carr@troutman.com](mailto:Dabney.carr@troutman.com)

Leslie A. Davis (admitted *pro hac vice*)  
Michael T. Carolan (*pro hac vice*  
motion pending)  
Troutman Pepper Locke LLP  
401 9<sup>th</sup> Street, NW  
Washington, DC 20004  
Telephone: (202) 274-2958  
[Leslie.davis@troutman.com](mailto:Leslie.davis@troutman.com)

-and-

Patricia B. Santelle (admitted *pro hac vice*)  
White and Williams LLP  
1650 Market Street  
One Liberty Place, Suite 1800  
Philadelphia, PA 19103  
Telephone: (215) 864-7000  
[santellep@whiteandwilliams.com](mailto:santellep@whiteandwilliams.com)

*Counsel for Century Indemnity  
Company and Westchester Fire  
Insurance Company*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on April 21, 2025, a true and correct copy of the foregoing Objection to Seventh Monthly Fee Statement of Caplin & Drysdale, Chartered for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from February 1, 2025 through February 28, 2025 was served upon all parties receiving electronic notice through the Court's ECF notification system.

/s/ Dabney J. Carr

Dabney J. Carr

# **EXHIBIT A**

**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, 8<sup>th</sup> Floor  
 Washington, DC 20036  
 Telephone: (202) 862-5000

*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  
 CAPLIN & DRYSDALE, CHARTERED FOR ALLOWANCE OF COMPENSATION  
 FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED  
FOR THE PERIOD FROM FEBRUARY 1, 2025, THROUGH FEBRUARY 28, 2025**

Name of Applicant:	Caplin & Drysdale, Chartered
Name of Client:	Official Committee of Unsecured Creditors
Date of retention order entered:	September 12, 2024, effective as of July 22, 2024 [Docket No. 202]
Time Period Covered:	February 1, 2025, through February 28, 2025
Total Fees Requested:	<u>\$228,186.00</u>
Total Expenses Requested:	<u>\$4,836.35</u>
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 Caplin & Drysdale, Chartered (“**Caplin**”), as counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in this chapter 11 case, hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) seeking interim payment of (i) \$182,548.80 (80% of \$228,186.00) as compensation for professional services rendered to the Committee and (ii) \$4,836.35 for reimbursement of actual and necessary expenses, for a total of \$187,385.15 for the period from February 1, 2025, through February 28, 2025 (the “**Fee Period**”).

#### **ITEMIZATION OF SERVICES RENDERED AND DISBURSEMENTS INCURRED**

1. In support of this Monthly Fee Statement, Caplin 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 providing certain information regarding the Caplin attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Monthly Fee Statement.
  - **Exhibit C** is a summary of the expenses incurred by Caplin during the Fee Period.
  - **Exhibit D** consists of Caplin’s detailed records of fees incurred during the Fee Period, including the number of hours expended (on an aggregate basis) by Caplin members, of counsel, associates, 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. Caplin 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, Caplin respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$187,385.15, consisting of (i) \$182,548.80, which is 80% of the fees incurred for reasonable and necessary professional services rendered by Caplin during the Fee Period, and (ii) \$4,836.35 for actual and necessary costs and expenses.

Dated: April 7, 2025

/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*)  
**CAPLIN & DRYSDALE, CHARTERED**  
1200 New Hampshire Avenue NW, 8<sup>th</sup> Floor  
Washington, DC 20036  
Telephone: (202) 862-5000  
Facsimile: (202) 429-3301  
kmaclay@capdale.com  
tphillips@capdale.com  
jliesemer@capdale.com  
nmiller@capdale.com

*Counsel for the Official  
Committee of Unsecured Creditors*

# EXHIBIT A

## SUMMARY OF FEES BY PROJECT CATEGORY

### FEBRUARY 1, 2025, THROUGH FEBRUARY 28, 2025

<b>PROJECT CATEGORY</b>	<b>HOURS</b>	<b>FEES</b>
(.02) Asset Disposition	0.0	\$0.00
(.03) Business Operations	0.0	\$0.00
(.04) Case Administration & Calendar Control	1.7	\$1,033.00
(.05) Claims Administration & Objections	0.0	\$0.00
(.06) Employee Benefits/Pensions	0.0	\$0.00
(.07) Fee Applications - Self	9.2	\$7,744.00
(.08) Objections - Fee/Retention Applications	0.0	\$0.00
(.09) Financing	0.0	\$0.00
(.10) Litigation	0.0	\$0.00
(.11) Plan & Disclosure Statement	166.2	\$189,864.50
(.12) Relief from Stay Proceedings	0.0	\$0.00
(.13) Tax Issues	0.0	\$0.00
(.15) Committee Meetings/Conferences	18.9	\$22,606.50
(.16) Travel	0.0	\$0.00
(.17) Docket Review & File Maintenance	2.2	\$1,309.00
(.18) Fee Applications - Others	6.8	\$5,629.00
(.19) Retention Applications - Others	0.0	\$0.00
(.20) Retention Applications - Self	0.0	\$0.00
<b>TOTAL</b>	<b>205.0</b>	<b>\$228,186.00</b>

# EXHIBIT B

## SUMMARY OF FEES BY PROFESSIONAL<sup>2</sup>

FEBRUARY 1, 2025, THROUGH FEBRUARY 28, 2025

<b>COMPENSATION BY PROFESSIONAL</b>				
<b>NAME OF PROFESSIONAL</b>	<b>POSITION / ADMISSION DATE / DEPARTMENT</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS</b>	<b>TOTAL COMPENSATION</b>
Ann C. McMillan	Member / 1984 / Bankruptcy	\$1,200	1.3	\$1,560.00
Kevin C. Maclay	Member / 1994 / Bankruptcy	\$1,970	1.4	\$2,758.00
Todd E. Phillips	Member / 2005 / Bankruptcy	\$1,455	27.1	\$39,430.50
Jeffrey A. Liesemer	Member / 1993 / Bankruptcy	\$1,520	63.2	\$96,064.00
James P. Wehner	Member / 1995 / Bankruptcy	\$1,520	1.2	\$1,824.00
Jeanna Rickards Koski	Of Counsel / 2004 / Bankruptcy	\$955	7.4	\$7,067.00
Nathaniel R. Miller	Of Counsel / 2016 / Bankruptcy	\$810	83.7	\$67,797.00
Ariel K. Hayes	Associate / 2023 / Bankruptcy	\$550	0.8	\$440.00
<b>TOTAL</b>			<b>186.1</b>	<b>\$216,940.50</b>

<b>COMPENSATION BY PARAPROFESSIONAL</b>				
<b>NAME OF PROFESSIONAL</b>	<b>POSITION / ADMISSION DATE / DEPARTMENT</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS</b>	<b>TOTAL COMPENSATION</b>
Cecilia Guerrero	Paralegal / N/A / Bankruptcy	\$595	18.9	\$11,245.50
<b>TOTAL</b>			<b>18.9</b>	<b>\$11,245.50</b>

<sup>2</sup> Nonworking travel time is billed at one-half of the professional's usual hourly rate.

# EXHIBIT C

## SUMMARY OF EXPENSES INCURRED DURING THE FEE PERIOD

<b>EXPENSE CATEGORY</b>	<b>AMOUNT</b>
Database Research	\$69.19
Travel	\$4,767.16
<b>TOTAL</b>	<b>\$4,836.35</b>

# CAPLIN & DRYSDALE

1200 New Hampshire Avenue NW 8th Floor  
Washington, DC 20036

Telephone: (202) 862-5000

Federal Tax I.D. No.: 52-1226629

Fax: (202) 429-3301

[www.capdale.com](http://www.capdale.com)

Official Committee of Unsecured Creditors of Hopeman Brothers, Inc.

Invoice #: 360466

Page: 1

RE: Hopeman Brothers, Inc. bankruptcy

For Professional Services Rendered Through February 28, 2025

Total Services	\$228,186.00
Total Disbursements	\$4,836.35
Total Current Charges	\$233,022.35

### Remittance Advice

[Payment is due upon receipt. If you should have any questions, please email accounting@capdale.com.](mailto:accounting@capdale.com)

**Check Payable To:**

Caplin & Drysdale, Chartered  
Attn: Accounts Receivable  
1200 New Hampshire Avenue NW 8th Floor  
Washington, DC 20036

**Wire Transfer:**

Receiving Bank: Bank of America  
ABA Wire Routing Number: 026009593  
ABA ACH Routing Number: 054001204  
Swift Code: BOFAUS3N  
Beneficiary: Caplin & Drysdale, Chartered  
Account Number: 001920814809

**Credit Card:**

We accept all major card companies. A service fee of 2.4% for Corporate Cards and 2.95% for Individual Cards will be added to all payments.

Please return this remittance page with your payment. Thank you.

# CAPLIN & DRYSDALE

1200 New Hampshire Avenue NW 8th Floor  
Washington, DC 20036

Telephone: (202) 862-5000

Federal Tax I.D. No.: 52-1226629

Fax: (202) 429-3301

[www.capdale.com](http://www.capdale.com)

Official Committee of Unsecured Creditors of Hopeman Brothers, Inc.

April 01, 2025

Invoice #: 360466

Page: 1

RE: Hopeman Brothers, Inc. bankruptcy

For Professional Services Rendered Through February 28, 2025

## SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
<b>.04 Case Administration &amp; Calendar Control</b>					
2/3/2025	NRM	Correspond w/ CG re hearing.	0.1	\$810.00	\$81.00
2/6/2025	CG	Review, revise and file certificates of service.	0.4	\$595.00	\$238.00
2/7/2025	CG	Review, revise and file certificates of service.	0.5	\$595.00	\$297.50
2/11/2025	CG	Communications w/ NRM and chambers re hearing registration.	0.2	\$595.00	\$119.00
2/19/2025	CG	Update docketing calendar.	0.3	\$595.00	\$178.50
2/21/2025	CG	Review, revise and file certificates of service.	0.2	\$595.00	\$119.00
		<b>Total</b>	<b>1.70</b>		<b>\$1,033.00</b>
<b>.07 Fee Applications-Self</b>					
2/2/2025	KCM	Review/edit December monthly fee application.	0.5	\$1,970.00	\$985.00
2/10/2025	JAL	Review draft CNO.	0.2	\$1,520.00	\$304.00
2/10/2025	NRM	Correspond w/ CG re CNO for fee application (.2); review same (.2).	0.4	\$810.00	\$324.00
2/10/2025	CG	Communications w/ UST, JAL, and NRM re LEDES files (.2); draft and revise CNO and proposed order re 2nd interim fee application and materials re same (.9); communications w/ NRM re same (.3); review communication w/ NRM and UST re fee-related issue (.2).	1.6	\$595.00	\$952.00
2/11/2025	NRM	Correspond w/ K. Montgomery, JAL, and CG re proposed order re interim fee application (.2); correspond w/ KCM, TEP, JAL, and CG re same (.2); review revised CNO and revise proposed order (.2); review monthly statement (.3).	0.9	\$810.00	\$729.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.07 Fee Applications-Self</b>					
2/11/2025	CG	Draft and revise proposed order re 2nd interim fee application and materials re same (.6); communications w/ JAL and NRM re same (.2); review communication w/ NRM and UST re fee-related issue (.2); revise, finalize, and file monthly fee statement (1.3); communicate w/ NRM and JAL re same (.1).	2.4	\$595.00	\$1,428.00
2/21/2025	CG	Review and revise monthly fee statement.	0.8	\$595.00	\$476.00
2/27/2025	TEP	Review and edit monthly fee application (.9); confer w/ CG re same (.4).	1.3	\$1,455.00	\$1,891.50
2/27/2025	CG	Review and revise monthly fee statement (.7); confer w/ TEP re same (.4).	1.1	\$595.00	\$654.50
		<b>Total</b>	<b>9.20</b>		<b>\$7,744.00</b>
<b>.11 Plan &amp; Disclosure Statement</b>					
2/2/2025	TEP	Communications w/ NRM re FTI 524(g) analysis.	0.2	\$1,455.00	\$291.00
2/2/2025	NRM	Communications w/ TEP re FTI 524(g) analysis.	0.1	\$810.00	\$81.00
2/3/2025	NRM	Communications w/ TEP re 524(g) research.	0.1	\$810.00	\$81.00
2/4/2025	ACM	Confer w/ TEP re potential FCR candidate.	0.1	\$1,200.00	\$120.00
2/4/2025	TEP	Confer w/ ACM re potential FCR candidate.	0.1	\$1,455.00	\$145.50
2/6/2025	JAL	Teleconference w/ J. Raskin, TEP, and NRM re next steps.	0.2	\$1,520.00	\$304.00
2/6/2025	TEP	Communications w/ D. Cox re next steps (.2); communications w/ JAL and NRM re same (.2); review JAL communications re same (.1); confer w/ NRM re 524(g) issue (.1); confer w/ JAL, NRM, and J. Raskin re next steps (.2).	0.8	\$1,455.00	\$1,164.00
2/6/2025	NRM	Confer w/ TEP re 524(g) issue (.1); review and analyze FTI mediation presentation (.8); correspond w/ W. Scheff, TEP, C. Tully, M. Berkin, and S. Andelman re same (.2); confer w/ TEP, JAL, and J. Raskin re next steps (.2); correspond w/ J. Raskin, JAL, TEP, D. Cox, B. Edwards, and B. Nes re same (.1).	1.4	\$810.00	\$1,134.00
2/7/2025	JAL	Teleconference w/ NRM re next steps (.1); review and analyze Debtor's markup of draft term sheet (1.7); confer w/ TEP re same (.1).	1.9	\$1,520.00	\$2,888.00
2/7/2025	TEP	Review T. Brown communication re mediation issues (.1); review related materials (.2); confer w/ JAL re same (.1); confer w/ NRM re same (.1).	0.5	\$1,455.00	\$727.50
2/7/2025	NRM	Review revisions from Debtor to term sheet (.4); confer w/ TEP re same (.1); review and revise term sheet (2.2); draft and revise answers to Debtor's information requests (1.1); correspond w/ TEP, JAL, and KCM re same (.1).	3.9	\$810.00	\$3,159.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/8/2025	JAL	Review and analyze issues re 524(g) plan and draft term sheet.	1.1	\$1,520.00	\$1,672.00
2/8/2025	TEP	Review NRM communication re term sheet revisions (.3); communications w/ NRM re same (.1).	0.4	\$1,455.00	\$582.00
2/9/2025	ACM	Review revised term sheet and information request received from Debtor.	0.2	\$1,200.00	\$240.00
2/9/2025	JAL	Communications w/ NRM re status and upcoming hearing (.2); communications w/ TEP and NRM re next steps (.4); review and analyze proposed revisions re term sheet markup (.7).	1.3	\$1,520.00	\$1,976.00
2/9/2025	TEP	Communications w/ KCM, JAL, and NRM re mediation and term sheet next steps (.3); plan/prepare re next steps (.2).	0.5	\$1,455.00	\$727.50
2/10/2025	JAL	Communications w/ B. Edwards re mediation next steps (.2); communicate w/ T. Brown re mediation scheduling (.2); communications w/ B. Edwards, J. Raskin, and D. Cox re term sheet markup and next steps (.2); communications w/ C. Tully, S. Andelman, and W. Scheff at FTI re same (.5); review correspondence from J. Raskin re mediation issues (.6); review and analyze Debtor's information request in prep for call w/ mediator (1.3).	3.0	\$1,520.00	\$4,560.00
2/10/2025	NRM	Correspond w/ T. Long re omnibus hearing.	0.2	\$810.00	\$162.00
2/11/2025	JAL	Communications w/ NRM re status and next steps (.5); correspond w/ B. Edwards and J. Raskin re upcoming mediation session (.2); correspond w/ TEP re same (.1); teleconferences w/ NRM re same (.4); review and analyze correspondence from D. Cox re same (.4); review and analyze materials in prep for same (.8); review draft mediation talking points (.4).	2.8	\$1,520.00	\$4,256.00
2/11/2025	JRK	Research and analyze 524(g) plan issues (4.3); draft and revise analysis re same (3.1).	7.4	\$955.00	\$7,067.00
2/11/2025	NRM	Correspond w/ T. Long re omnibus hearing (.2); confer w/ T. Long re same (multiple) (.1); correspond w/ JAL, TEP and KCM re same (.3); correspond w/ CG re same (.2); review proposed agenda re same (.1); draft memorandum re meet and confer (4.1); correspond w/ JAL re same (.1); confer w/ JAL re mediation issues (multiple) (.4).	5.5 OBJECT TO 4.6	\$810.00	\$4,455.00



**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/12/2025	JAL	Teleconference w/ NRM re next steps (.1); teleconference w/ NRM re draft term sheet and next steps (.1); teleconference w/ NRM and TEP re same (.2); review materials in prep for upcoming mediation session (.4); communications w/ C. Tully re mediation issue (.4); teleconference w/ B. Edwards, D. Cox, J. Raskin, NRM, and TEP (partial) in prep for mediation session (1.0); attend mediation session (1.7); review and analyze materials re proposed term sheet (2.4).	6.3	\$1,520.00	\$9,576.00
2/12/2025	TEP	Confer w/ B. Edwards, D. Cox, J. Raskin, NRM, and TEP re mediation and next steps (partial) (.8); conferences w/ potential FCR candidate re next steps (.2); confer w/ NRM and JAL re same (.2); review JAL and C. Tully communications re plan-related analysis (.2).	1.4	\$1,455.00	\$2,037.00
2/12/2025	NRM	Draft memorandum re combined hearing on disclosure statement and confirmation (.3); correspond w/ JAL re same (.1); confer w/ B. Edwards, D. Cox, J. Raskin, JAL, and TEP (partial) re mediation issues (1.0); attend mediation session (1.7); confer w/ JAL re same (.1); communications w/ TEP re same (.1); confer w/ JAL and TEP re same (.2); review correspondence from C. Tully re 524(g) plan issues (.1); research re follow-up questions from meet and confer (.3); correspond w/ CG re same (.1); research re liquidation analyses (.7); draft memorandum re same (.3); confer w/ JAL re same (.1); prepare re hearing (.6).	5.7	\$810.00	\$4,617.00
2/12/2025	CG	Fact research re 524(g) documents (.6); communicate w/ NRM re same (.1).	0.7	\$595.00	\$416.50
2/13/2025	JAL	Review correspondence from NRM re mediation-related issue (.2); attend hearing (.3); prep re same (.3); confer w/ NRM re same (.1); communications w/ C. Tully and W. Scheff re mediation-related issue and next steps (.4); review draft correspondence and accompanying materials to Debtor's counsel re same (.4); teleconference w/ C. Tully, W. Scheff, and NRM re same (.5); communications w/ TEP and NRM re proposed revisions to draft 524(g) term sheet (.9); review and revise draft term sheet (3.5).	6.6 OBJECT TO 5.9	\$1,520.00	\$10,032.00
2/13/2025	TEP	Communications w/ KCM, JAL, and NRM re term sheet revisions.	0.3	\$1,455.00	\$436.50

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/13/2025	NRM	Attend hearing (.3); prepare re same (.3); confer w/ JAL, C. Tully, and W. Scheff re liquidation analysis (.5); correspond w/ JAL, C. Tully, TEP, and W. Scheff re same (.1); research re mediation issues (.1); correspond w/ KNF re same (.1); draft analysis re settlement and plan-related research (2.4); confer w/ JAL re same (.1); communications w/ TEP, JAL, and KCM re revisions to term sheet (.3); correspond w/ KCM re same (.1); review and revise draft term sheet (2.1).	6.4	\$810.00	\$5,184.00
			OBJECT TO 5.8		
2/14/2025	JAL	Teleconferences w/ NRM re mediation issues and next steps (.4); teleconference w/ C. Tully, S. Andelman, M. Berkin, W. Scheff, and NRM re same (.6).	1.0	\$1,520.00	\$1,520.00
2/14/2025	KCM	Teleconference w/ TEP re term sheet issues.	0.1	\$1,970.00	\$197.00
2/14/2025	TEP	Communications w/ KCM, JAL, and NRM re plan-related issue (.2); confer w/ NRM re term sheet revisions (.1); confer w/ KCM re same (.1); review revisions to term sheet and communications w/ KCM, JAL, and NRM re same (.4); communications w/ JAL and D. Cox re same (.3).	1.1	\$1,455.00	\$1,600.50
2/14/2025	NRM	Confer w/ JAL re mediation issues (multiple) (.4); research re liquidation analysis (.8); communications w/ TEP, JAL, J. Raskin, D. Cox, and Debtor's counsel re mediation issues (.3); review correspondence from B. Edwards and D. Cox re same (.2); confer w/ C. Tully, M. Berkin, W. Scheff, S. Andelman, and JAL re liquidation analysis (.6); correspond w/ C. Tully, M. Berkin, W. Scheff, S. Andelman, and JAL re same (.3); communicate w/ TEP, KCM, and JAL re term sheet (.1); confer w/ TEP re same (.1).	2.8	\$810.00	\$2,268.00
2/16/2025	JAL	Review and revise draft term sheet.	1.0	\$1,520.00	\$1,520.00
2/16/2025	TEP	Communications w/ NRM re term sheet (.3); communications w/ NRM re plan-related issue (.2).	0.5	\$1,455.00	\$727.50
2/16/2025	NRM	Review and revise term sheet (2.7); correspond w/ TEP re same (.1); correspond w/ TEP, JAL, and KCM re same (.4); review and analyze liquidation analysis (1.5); confer w/ W. Scheff re same (.1); correspond w/ JAL re same (.1); correspond w/ KCM, JAL, and TEP re plan-related issue (.2).	5.1	\$810.00	\$4,131.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/17/2025	JAL	Teleconferences w/ NRM re draft term sheet (.2); teleconference w/ C. Tully, S. Andelman, W. Scheff, and NRM re mediation-related issue (.3); review materials in prep for call w/ FTI (.4); review draft correspondence re revised term sheet (.5); review and analyze revised draft mediation materials (.7); review draft materials from FTI re same (.9).	3.0	\$1,520.00	\$4,560.00
2/17/2025	TEP	Communications w/ KCM, JAL, and NRM re term sheet revisions and next steps.	0.2	\$1,455.00	\$291.00
2/17/2025	NRM	Confer w/ JAL, C. Tully, W. Scheff, and S. Andelman re liquidation analysis (.3); communications w/ KCM re term sheet revisions (.2); communications w/ TEP re same (.2); communications w/ KCM re same (.3); confer w/ JAL re same (multiple) (.2); correspond w/ D. Cox, B. Edwards, B. Nes, J. Raskin, JAL, TEP, and KCM re same (.3); review and revise term sheet (3.1); correspond w/ KCM, TEP, and JAL re meet and confer (.2).	4.8	\$810.00	\$3,888.00
2/18/2025	JAL	Teleconferences w/ NRM re revisions to draft mediation materials (.3); communicate w/ NRM re same (.1); communicate w/ TEP re next steps (.1); confer w/ TEP and NRM re Debtor meeting (.1); review revised draft mediation-related materials (.2); communications w/ TEP and NRM re draft communication to Debtor (.3); conferences w/ NRM re same (.3); review and analyze materials re mediation issues (.3).	1.7	\$1,520.00	\$2,584.00
2/18/2025	TEP	Conferences w/ NRM re Debtor communication (.2); review and edit draft re same (.1); communications w/ JAL and NRM re same (.2); confer w/ JAL and NRM re Debtor meeting (.1); review Debtor and NRM communications re same (.2).	0.8	\$1,455.00	\$1,164.00
2/18/2025	NRM	Conferences w/ JAL re mediation materials (.3); confer w/ W. Scheff re same (.1); confer w/ S. Andelman re same (.1); correspond w/ S. Andelman, W. Scheff, JAL, C. Tully, and M. Berkin re same (.1); confer w/ TEP and JAL re Debtor meeting (.1); conferences w/ TEP re same (.2); correspond w/ B. Edwards, D. Cox, J. Raskin, TEP, and JAL re same (.3); correspond w/ Debtor's counsel and Judge Huennekens re same (.2); conferences w/ JAL re same (.3); research re revisions to term sheet (.7); review and revise memo re plan-related research (1.0).	3.4	\$810.00	\$2,754.00
2/19/2025	JAL	Review and analyze Debtor's motions re exclusivity and stay issues (1.2); review and analyze Debtor's markup of draft term sheet and related materials re prep for mediation session (1.8).	3.0	\$1,520.00	\$4,560.00
			OBJECT TO 1.8		

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/19/2025	TEP	Review J. Rovira communication re term sheet revisions and upcoming mediation (.1); review NRM and C. Tully communications re same (.2); prepare for mediation session (.3).	0.6	\$1,455.00	\$873.00
2/19/2025	NRM	Correspond w/ TEP re meeting w/ Debtor (.1); correspond w/ C. Tully, W. Scheff, JAL, and TEP re same (.2); review Debtor's motions re exclusivity and stay issues (.5); review research memo re same (.2); correspond w/ JAL, TEP and CG re same (.3); correspond w/ JAL re omnibus hearing (.1); review and analyze Debtor's markups to mediation materials (.8); correspond w/ C. Tully, W. Scheff, M. Berkin, S. Andelman, TEP, and JAL re same (.3).	2.5	\$810.00	\$2,025.00
2/20/2025	JAL	Review and revise draft term sheet (2.4); review and analyze revised mediation-related materials (1.0); teleconference w/ NRM re edits to draft term sheet (.1); review correspondence and attachments from NRM re edits to draft term sheet (.2); communications w/ TEP and NRM re same (.4); teleconference w/ TEP, NRM, D. Cox, J. Raskin, C. Tully, W. Scheff, and S. Andelman re liquidation analysis (.6); review and analyze materials in prep for call w/ FTI (.5); teleconference w/ TEP, NRM, and C. Tully re same (.3); attend mediation session (.7); review materials in prep for mediation session (.2); confer w/ TEP re same (.1); review and revise correspondence re same (.2).	6.7	\$1,520.00	\$10,184.00
2/20/2025	TEP	Confer w/ JAL, NRM, and C. Tully re mediation prep (.3); prepare for mediation (.2); attend mediation session (.7); conference w/ JAL re same (.1); review C. Tully communications re liquidation analysis (.1); teleconference w/ JAL, NRM, D. Cox, J. Raskin, C. Tully, W. Scheff, and S. Andelman re same (.6); review JAL communication re term sheet revisions (.1); conferences w/ NRM re same (.4); review revisions to term sheet and communications w/ KCM, JAL, and NRM re same (.5); communications w/ JAL and NRM re term sheet finalization (.3).	3.3	\$1,455.00	\$4,801.50

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/20/2025	NRM	Confer w/ TEP, JAL, and C. Tully re mediation prep (.3); attend mediation session (.7); correspond w/ W. Scheff re background materials for liquidation analysis (.1); communicate w/ CG re same (.1); correspond w/ JAL re omnibus hearing issue (.1); confer w/ JAL, TEP, D. Cox, J. Raskin, C. Tully, W. Scheff, and S. Andelman re liquidation analysis (.6); conferences w/ TEP re term sheet revisions (.4); confer w/ JAL re same (.1); correspond w/ KCM re same (.2); communications w/ TEP and JAL re same (.3); confer w/ J. Raskin re same (.2); review and revise term sheet (1.1); correspond w/ JAL and TEP re same (.3); correspond w/ KCM, TEP, and JAL re same (.2); correspond w/ Debtor's counsel and Judge Huennekens re same (.1); review liquidation analysis (.7); correspond w/ JAL and TEP re same (.3); correspond w/ W. Scheff and S. Andelman re same (.1).	5.9	\$810.00	\$4,779.00
2/20/2025	CG	Prepare expert materials and communicate w/ NRM re same.	0.2	\$595.00	\$119.00
2/21/2025	JAL	Draft and revise correspondence to M. Mintz re developments and case status (.7); correspond w/ NRM re mediation-related issues (.3); review correspondence from D. Cox re same (.1); correspond w/ TEP and NRM re same (.2); review and analyze revised draft of mediation-related materials and related correspondence (1.1); correspond w/ NRM and TEP re same (.4); teleconference w/ TEP, KCM (partial), NRM, and JPW (partial) re liquidation analysis and next steps (partial) (1.4).	4.2	\$1,520.00	\$6,384.00
2/21/2025	JPW	Teleconference w/ TEP, KCM (partial), JAL (partial), NRM re liquidation analysis (partial).	1.2	\$1,520.00	\$1,824.00
2/21/2025	KCM	Teleconferences w/ TEP re liquidation analysis and next steps (.3); teleconference w/ TEP, JAL (partial), NRM, and JPW (partial) re liquidation analysis (partial) (.5).	0.8	\$1,970.00	\$1,576.00
2/21/2025	TEP	Review D. Cox, C. Tully, and J. Raskin communications re liquidation analysis (.3); communications w/ JAL and NRM re liquidation analysis revisions and next steps (.5); review revisions to liquidation analysis (.4); conferences w/ NRM re same (.3); conferences w/ KCM re same (.3); plan/prepare re next steps (.1); confer w/ KCM (partial), JAL (partial), NRM, and JPW (partial) re liquidation analysis (1.6); communications w/ NRM re same (.2).	3.7	\$1,455.00	\$5,383.50

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/21/2025	NRM	Correspond w/ P. Barrett re term sheet issues (.1); communications w/ TEP and JAL re same (.4); correspond w/ S. Andelman re same (.2); correspond w/ C. Tully, W. Scheff, and S. Andelman re same (.1); confer w/ TEP, KCM (partial), JAL (partial), and JPW (partial) re liquidation analysis (1.6); confer w/ J. Raskin re same (.1); communications w/ D. Cox re same (.1); conferences w/ TEP re same (.3); review liquidation analysis (.8); correspond w/ TEP and JAL re same (.4); correspond w/ C. Tully, W. Scheff, and S. Andelman re same (.2); correspond w/ D. Cox, J. Raskin, TEP, and JAL re same (.1); correspond w/ W. Scheff, C. Tully, S. Andelman, TEP, and JAL re same (.2); communications w/ KCM re same (.1); correspond w/ D. Cox, J. Raskin, W. Scheff, C. Tully, JAL, KCM, TEP, B. Edwards, B. Nes, S. Andelman, and M. Berkin re same (.2); correspond w/ D. Cox re same (.1); correspond w/ S. Andelman and W. Scheff re same (.1); correspond w/ Debtor's counsel and K. Huennekens re same (.1).	5.2	\$810.00	\$4,212.00
2/22/2025	NRM	Review correspondence from K. Huennekens re mediation issues.	0.1	\$810.00	\$81.00
2/24/2025	JAL	Teleconference w/ NRM re case status and Debtor's stay motion (.4); review letter from Liberty counsel re mediation and communications w/ TEP and NRM re same (.2); communications w/ NRM re upcoming hearing (.2).	0.8	\$1,520.00	\$1,216.00
2/24/2025	NRM	Teleconference w/ JAL re case status and Debtor's stay motion (.4); prepare re same (.1); review letter from Liberty Mutual re mediation (.2); correspond w/ B. Edwards, D. Cox, J. Raskin, B. Nes, JAL, TEP, and KCM re same (.1); research re potential plan issues (.7); draft memo re same (.4).	1.9 OBJECT TO 1.1	\$810.00	\$1,539.00
2/25/2025	ACM	Review and analyze term sheets.	0.3	\$1,200.00	\$360.00
2/25/2025	JAL	Review correspondence from T. Brown re mediation issue (.1); confer w/ TEP and NRM re plan issue (.1); review draft correspondence to Debtor's counsel (.4); confer w/ NRM re same (.1).	0.7	\$1,520.00	\$1,064.00
2/25/2025	TEP	Confer w/ NRM and JAL re Debtor plan inquiry (.1); research re same (.1); confer w/ NRM re same (.1); communications w/ KCM, JAL, and NRM re next steps (.1).	0.4	\$1,455.00	\$582.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/25/2025	NRM	Confer w/ TEP and JAL re plan-related research (.1); confer w/ JAL re same (.1); confer w/ TEP re same (.1); draft and revise memo re same (2.3); correspond w/ JAL re same (.2); correspond w/ T. Brown and JAL re same (.1).	2.9	\$810.00	\$2,349.00
2/25/2025	CG	Fact research re 524(g) materials (1.6); communications w/ NRM re same (.2).	1.8	\$595.00	\$1,071.00
2/26/2025	ACM	Review proposed changes to term sheet (.2); exchange e-mails w/ TEP re same (.1).	0.3	\$1,200.00	\$360.00
2/26/2025	JAL	Review and analyze Debtor's markup of mediation-related documents (.6); communications w/ TEP, NRM, and KCM re same (.2); communications w/ NRM re developments and next steps (.3).	1.1	\$1,520.00	\$1,672.00
2/26/2025	TEP	Communications w/ KCM, JAL, and NRM re Debtor call and next steps (.3); review T. Brown communications re mediation and next steps (.1).	0.4	\$1,455.00	\$582.00
2/26/2025	NRM	Review correspondence from T. Brown re term sheet (.1); communications w/ JAL and TEP re meet and confer (.2); correspond w/ C. Tully, W. Scheff, S. Andelman, JAL, and TEP re same (.2); correspond w/ T. Brown, J. Rovira, J. Raskin, D. Cox, B. Edwards, JAL, and TEP re same (.4); review Debtor's proposed edits to term sheet (.2); draft and revise status report (.7).	1.8	\$810.00	\$1,458.00
2/27/2025	ACM	Review proposed changes to term sheet.	0.1	\$1,200.00	\$120.00
2/27/2025	JAL	Attend mediation session (.5); review and analyze HII markup of draft term sheet and related materials (.8); confer w/ TEP and NRM re same (.2); communications w/ TEP and NRM re developments and next steps (.2); confer w/ TEP re same (.1); review edits to draft joint status report (.3); teleconference w/ TEP, NRM, and J. Raskin re HII markup and next steps (.2); communications w/ D. Cox re same (.3); review and analyze proposed markup of draft term sheet (.8); communications w/ NRM and TEP re same (.2); communications w/ TEP and NRM re mediation-related issues (.3).	3.9	\$1,520.00	\$5,928.00
2/27/2025	TEP	Prepare for mediation (.2); attend mediation session (.5); confer w/ NRM re same (.1); confer w/ JAL and NRM re HII issues (.2); confer w/ JAL, NRM, and J. Raskin re same (.2); confer w/ JAL re same (.1); conferences w/ NRM re revisions to term sheet (.2); communications w/ JAL and NRM re same (.1).	1.6	\$1,455.00	\$2,328.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/27/2025	NRM	Confer w/ TEP re mediation issue (.1); attend mediation session (.5); confer w/ J. Raskin, TEP, and JAL re same (.2); review HII proposed revisions to term sheet (.3); conferences w/ TEP re same (.2); research re draft Exhibit B to term sheet (.4); confer w/ AKH re same (.2); correspond w/ AKH re same (.2); confer w/ JAL and TEP re same (.2); review and revise term sheet (2.1); correspond w/ TEP and JAL re same (.4); review revisions from JAL re same (.2); revise status report (.1); correspond w/ B. Edwards, D. Cox, J. Raskin, TEP, and JAL re same (.3); correspond w/ T. Brown, J. Rovira, T. Long, TEP, and JAL re same (.2); research re dismissal issue (.9); correspond w/ CG re same (.2).	6.7	\$810.00	\$5,427.00
2/27/2025	AKH	Confer w/ NRM re preparation for settlement (.2); review and revise materials re same (.6).	0.8	\$550.00	\$440.00
2/27/2025	CG	Fact research re dismissal stip (1.8); communications w/ NRM re same (.3).	2.1	\$595.00	\$1,249.50
2/28/2025	ACM	Teleconference w/ TEP re term sheet issues (.1); review revised term sheet (.1); communications w/ TEP re same (.1).	0.3	\$1,200.00	\$360.00
2/28/2025	JAL	Communications w/ TEP, NRM, and KCM re comments on term sheet markup (.4); attend mediation session (.5); communications w/ J. Raskin re term sheet issue (.2); teleconference w/ TEP re next steps (.1); communications w/ P. Barrett re markup of term sheet (.4); teleconference w/ J. Raskin re term sheet issue (.1); communications w/ TEP and NRM re same (.2); confer w/ NRM re same (.1); communications w/ TEP and NRM re case status (.3); review and analyze draft correspondence to HII counsel re mediation issues (.6); review and analyze HII markup of draft term sheet (.6); review proposed third interim stay order (.2); communications w/ T. Long re same (.2); communicate w/ J. Rovira re mediation issue (.1); review and analyze pending issues and next steps (1.2); communications w/ J. Raskin and D. Cox re developments and next steps (.4); teleconference w/ TEP and NRM re revisions to draft term sheet and next steps (.2); teleconference w/ TEP, NRM, J. Raskin, and D. Cox re same (.3); review NRM proposed revisions to draft term sheet (.3).	6.4 OBJECT TO 6.0	\$1,520.00	\$9,728.00



**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.11 Plan &amp; Disclosure Statement</b>					
2/28/2025	TEP	Communications w/ JAL and NRM re term sheet revisions (.2); conferences w/ NRM re same (.3); confer w/ ACM re same (.1); prepare for mediation (.1); attend mediation session (.5); review J. Raskin and JAL communications re term sheet (.2); confer w/ JAL re same (.1); communications w/ JAL and NRM re same (.3); communications w/ JAL and NRM re term sheet revisions (.1); confer w/ JAL and NRM re same (.2); confer w/ JAL, NRM, D. Cox, and J. Raskin re same (.3); review revisions to term sheet (.4); communications w/ JAL and NRM re same (.3); communications w/ ACM re same (.2).	3.3	\$1,455.00	\$4,801.50
2/28/2025	NRM	Review correspondence from TEP and JAL re term sheet (.3); confer w/ JAL re same (.1); conferences w/ TEP re same (.3); attend mediation session (.5); correspond w/ Debtor, HII, K. Huenekens, TEP, and JAL re proposed revisions to term sheet (.1); review HII revisions to term sheet (.3); review correspondence from JAL, D. Cox, and J. Raskin re same (.3); confer w/ TEP and JAL re same (.2); confer w/ TEP, JAL, J. Raskin, and D. Cox re same (.3); correspond w/ TEP, JAL, J. Raskin, B. Edwards, and D. Cox re same (.3); review and revise term sheet (1.6); draft stipulation of dismissal (.7); correspond w/ JAL, TEP, and CG re same (.2); correspond w/ CG re status report (.3); correspond w/ JAL re same (.1).	5.6 OBJECT TO 4.3	\$810.00	\$4,536.00
2/28/2025	CG	Review and revise stip re dismissal and joint status report (.3); communications w/ NRM re same (.2); finalize and file joint status report (.4); communicate w/ noticing agent re same (.1).	1.0	\$595.00	\$595.00
<b>Total</b>			<b>166.20</b>		<b>\$189,864.50</b>
<b>.15 Committee Meetings/Conferences</b>					
2/3/2025	JAL	Communications w/ NRM and TEP re draft agenda and minutes.	0.2	\$1,520.00	\$304.00
2/3/2025	TEP	Communications w/ NRM re FTI presentation to Committee (.1); confer w/ C. Tully, W. Scheff, S. Andelman, and NRM re upcoming Committee meeting (.3); communications w/ NRM re minutes/agenda (.2).	0.6	\$1,455.00	\$873.00
2/3/2025	NRM	Draft and revise minutes for Committee meeting (.3); draft agenda re same (.1); correspond w/ TEP, JAL, and KCM re same (.1); correspond w/ Committee re same (.1); prepare materials re constituent inquiry (.4); correspond w/ TEP re same (.1); confer w/ C. Tully, W. Scheff, S. Andelman, and TEP re upcoming Committee meeting (.3); correspond w/ C. Tully, W. Scheff, S. Andelman, and TEP re same (.2).	1.6	\$810.00	\$1,296.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.15 Committee Meetings/Conferences</b>					
2/4/2025	JAL	Attend Committee meeting.	0.6	\$1,520.00	\$912.00
2/4/2025	TEP	Attend Committee meeting (.6); conferences w/ NRM re same (.2).	0.8	\$1,455.00	\$1,164.00
2/4/2025	NRM	Attend Committee meeting (.6); conferences w/ TEP re same (.2); draft minutes re same (.1); correspond w/ Committee re presentation (.1); correspond w/ JAL re same (.1).	1.1	\$810.00	\$891.00
2/6/2025	TEP	Communications w/ constituent re case status.	0.1	\$1,455.00	\$145.50
2/7/2025	TEP	Communications w/ JAL and NRM re upcoming Committee meeting (.3); communications w/ Committee co-chairs re same (.2).	0.5	\$1,455.00	\$727.50
2/9/2025	TEP	Communications w/ NRM re Committee meeting (.1); review NRM communication re same (.1).	0.2	\$1,455.00	\$291.00
2/9/2025	NRM	Correspond w/ Committee re meeting (.1); correspond w/ TEP re constituent inquiry (.2).	0.3	\$810.00	\$243.00
2/10/2025	TEP	Communications w/ Committee co-chairs re Committee meeting (.1); communications w/ KCM, JAL, and NRM re same (.1).	0.2	\$1,455.00	\$291.00
2/11/2025	TEP	Communications w/ NRM re Committee meeting.	0.1	\$1,455.00	\$145.50
2/12/2025	TEP	Confer w/ Committee co-chair re mediation and next steps.	0.1	\$1,455.00	\$145.50
2/14/2025	TEP	Confer w/ constituent and B. Edwards re case status.	0.1	\$1,455.00	\$145.50
2/14/2025	NRM	Correspond w/ TEP, JAL, and KCM re constituent inquiry.	0.1	\$810.00	\$81.00
2/16/2025	NRM	Draft and revise Committee meeting minutes (.2); draft agenda re same (.1); correspond w/ TEP, JAL, and KCM re same (.1).	0.4	\$810.00	\$324.00
2/17/2025	JAL	Review draft communication to Committee.	0.3	\$1,520.00	\$456.00
2/17/2025	TEP	Review and edit agenda and communication to Committee and communications w/ KCM, JAL, and NRM re same.	0.3	\$1,455.00	\$436.50
2/18/2025	JAL	Review and revise draft communication to Committee (.4); review materials in prep for Committee meeting (.9); confer w/ TEP re same (.1); attend Committee meeting (.5).	1.9	\$1,520.00	\$2,888.00
2/18/2025	TEP	Confer w/ NRM re upcoming Committee meeting (.1); prepare for Committee meeting (.1); attend Committee meeting (.5).	0.7	\$1,455.00	\$1,018.50
2/18/2025	NRM	Attend Committee meeting (.5); draft minutes re same (.2); correspond w/ C. Tully re same (.1); correspond w/ Committee re same (.1); confer w/ TEP re upcoming Committee meeting (.1).	1.0	\$810.00	\$810.00
2/19/2025	JAL	Review and revise draft communication to Committee.	0.4	\$1,520.00	\$608.00

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.15 Committee Meetings/Conferences</b>					
2/19/2025	TEP	Communications w/ KCM, JAL, and NRM re Committee update communication.	0.2	\$1,455.00	\$291.00
2/19/2025	NRM	Draft correspondence to Committee re Debtor's motions to extend exclusivity and automatic stay (.7); correspond w/ TEP, JAL, and KCM re same (.2).	0.9	\$810.00	\$729.00
2/21/2025	TEP	Confer w/ constituent re case status and next steps.	0.2	\$1,455.00	\$291.00
2/21/2025	NRM	Review correspondence from constituent (.1); correspond w/ JAL re same (.2); draft talking points re same (.4); correspond w/ constituent re same (.1).	0.8	\$810.00	\$648.00
2/24/2025	JAL	Communications w/ TEP and NRM re Committee meeting agenda.	0.6	\$1,520.00	\$912.00
2/24/2025	TEP	Communications w/ JAL and NRM re upcoming Committee meeting (.1); communications w/ NRM re Committee communication (.1); review Committee member and NRM communications re mediation issue (.1); review NRM and JAL communications re minutes and agenda (.2); communications w/ KCM re same (.1).	0.6	\$1,455.00	\$873.00
2/24/2025	NRM	Communications w/ TEP, KCM, and JAL re Committee meeting (.1); communications w/ TEP re same (.1); review communications w/ JAL re same (.2); draft and revise meeting minutes (.4); draft and revise agenda (.1); correspond w/ Committee re same (.1); correspond w/ Committee re insurer issue (.1); correspond w/ C. Tully, W. Scheff, and S. Andelman re Committee meeting (.1).	1.2	\$810.00	\$972.00
2/25/2025	JAL	Conferences w/ TEP re upcoming Committee meeting (.2); review materials in prep for Committee meeting (.6); attend Committee meeting (.3).	1.1	\$1,520.00	\$1,672.00
2/25/2025	TEP	Prepare for Committee meeting (.4); attend Committee meeting (.3); conferences w/ JAL re same (.2).	0.9	\$1,455.00	\$1,309.50
2/25/2025	NRM	Attend Committee meeting (.3); prepare re same (.1).	0.4	\$810.00	\$324.00
2/26/2025	NRM	Correspond w/ Committee re Debtor's proposed revisions to term sheet.	0.1	\$810.00	\$81.00
2/27/2025	TEP	Confer w/ Committee co-chair re term sheet and mediation update.	0.1	\$1,455.00	\$145.50
2/27/2025	NRM	Correspond w/ Committee re HII revisions to term sheet (.1); correspond w/ Committee re joint status report (.1).	0.2	\$810.00	\$162.00
<b>Total</b>			<b>18.90</b>		<b>\$22,606.50</b>

**.17 Docket Review & File Maintenance**

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.17 Docket Review &amp; File Maintenance</b>					
2/3/2025	CG	Review dockets and relevant communications and update internal files re same.	0.3	\$595.00	\$178.50
2/4/2025	CG	Review dockets and relevant communications and update internal files re same.	0.4	\$595.00	\$238.00
2/10/2025	CG	Review dockets and relevant communications and update internal files re same.	0.6	\$595.00	\$357.00
2/11/2025	CG	Review dockets and relevant communications and update internal files re same.	0.3	\$595.00	\$178.50
2/25/2025	CG	Communications w/ court reporter re hearing transcripts (.1); update internal files re same (.1).	0.2	\$595.00	\$119.00
2/26/2025	CG	Communications w/ court reporter re hearing transcripts (.3); update internal files re same (.1).	0.4	\$595.00	\$238.00
		<b>Total</b>	<b>2.20</b>		<b>\$1,309.00</b>
<b>.18 Fee Applications-Others</b>					
2/4/2025	NRM	Revise CNO for Morgan Lewis interim fee application (.1); correspond w/ C. DeSantis re same (.2); confer w/ CG re same (.1).	0.4	\$810.00	\$324.00
2/4/2025	CG	Confer w/ NRM re Morgan Lewis interim fee application.	0.1	\$595.00	\$59.50
2/7/2025	JAL	Review draft CNO re Morgan Lewis interim fee application.	0.4	\$1,520.00	\$608.00
2/7/2025	NRM	Revise CNO for Morgan Lewis interim fee application (.6); correspond w/ JAL and CG re same (.3).	0.9	\$810.00	\$729.00
2/7/2025	CG	Review and file Morgan Lewis CNO (.3); communications w/ NRM re same (.2).	0.5	\$595.00	\$297.50
2/10/2025	CG	Draft and revise CNO and proposed order re FTI interim fee application (.6); communications w/ NRM re same (.2).	0.8	\$595.00	\$476.00
2/11/2025	CG	Draft and revise CNO and proposed order re FTI interim fee application (.9); communications w/ JAL and NRM re same (.2).	1.1	\$595.00	\$654.50
2/16/2025	JAL	Review FTI draft monthly fee statement.	0.4	\$1,520.00	\$608.00
2/16/2025	NRM	Correspond w/ JAL and CG re FTI monthly fee statement (.1); correspond w/ S. Andelman, C. Tully, and W. Scheff re same (.2).	0.3	\$810.00	\$243.00
2/17/2025	CG	Review, finalize and file FTI monthly fee statement (.3); communicate w/ noticing agent re same (.1).	0.4	\$595.00	\$238.00
2/19/2025	JAL	Review and comment on Morgan Lewis monthly fee statement (.3); correspond w/ NRM re same (.1).	0.4	\$1,520.00	\$608.00
2/19/2025	NRM	Review Morgan Lewis monthly fee statement (.4); confer w/ CG re same (.1); correspond w/ JAL re same (.1).	0.6	\$810.00	\$486.00

April 01, 2025

Invoice #: 360466

Page: 16

**SERVICES**

Date	Person	Description of Services	Hours	Rate	Amount
<b>.18 Fee Applications-Others</b>					
2/19/2025	CG	Confer w/ NRM re Morgan Lewis monthly fee statement.	0.1	\$595.00	\$59.50
2/21/2025	CG	Review, finalize and file Morgan Lewis monthly fee statement (.3); communicate w/ noticing agent re same (.1).	0.4	\$595.00	\$238.00
<b>Total</b>			<b>6.80</b>		<b>\$5,629.00</b>
Total Professional Services			205.0		\$228,186.00

**PERSON RECAP**

Person	Title	Hours	Rate	Amount	
JAL	Jeffrey A. Liesemer	Member	63.2	\$1,520.00	\$96,064.00
KCM	Kevin C. Maclay	Member	1.4	\$1,970.00	\$2,758.00
ACM	Ann C. McMillan	Member	1.3	\$1,200.00	\$1,560.00
TEP	Todd E. Phillips	Member	27.1	\$1,455.00	\$39,430.50
JPW	James P. Wehner	Member	1.2	\$1,520.00	\$1,824.00
JRK	Jeanna Rickards Koski	Of Counsel	7.4	\$955.00	\$7,067.00
NRM	Nathaniel R. Miller	Of Counsel	83.7	\$810.00	\$67,797.00
AKH	Ariel K. Hayes	Associate	0.8	\$550.00	\$440.00
CG	Cecilia Guerrero	Paralegal	18.9	\$595.00	\$11,245.50

**DISBURSEMENTS**

Date	Description of Disbursements	Amount
01/13/2025	Taxi - Transportation to and from Richmond (JAL/NRM) [.16]	\$1,700.00
01/22/2025	Trvl Exp - Hotel charges in Richmond (TEP) [.16]	\$458.14
01/22/2025	Taxi - Transportation to and from Richmond for mediation (TEP/JAL/NRM) [.16]	\$2,300.00
01/22/2025	Trvl Exp - Meals - Meal for TEP in Richmond [.16]	\$25.30
02/20/2025	Trvl Exp - Hotel charges in Richmond [.16]	\$283.72
02/28/2025	Database Research - Lexis - NRM - 2/06-08/2025 [.11]	\$66.96
02/28/2025	Database Research - Westlaw - MEB - 02/20/2025 [.11]	\$2.23
Total Disbursements		\$4,836.35

Total Services	\$228,186.00
Total Disbursements	\$4,836.35
Total Current Charges	\$233,022.35

**TASK RECAP**

**Services**

<u>Category</u>	<u>Hours</u>	<u>Amount</u>
.04	1.70	\$1,033.00
.07	9.20	\$7,744.00
.11	166.20	\$189,864.50
.15	18.90	\$22,606.50
.17	2.20	\$1,309.00
.18	6.80	\$5,629.00
	<u>205.00</u>	<u>\$228,186.00</u>

**Disbursements**

<u>Category</u>	<u>Amount</u>
.11	\$69.19
.16	\$4,767.16
	<u>\$4,836.35</u>

**BREAKDOWN BY PERSON**

<u>Person</u>	<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
NRM Nathaniel R. Miller	.04	0.10	\$810.00	\$81.00
CG Cecilia Guerrero	.04	1.60	\$595.00	\$952.00
JAL Jeffrey A. Liesemer	.07	0.20	\$1,520.00	\$304.00
KCM Kevin C. Maclay	.07	0.50	\$1,970.00	\$985.00
TEP Todd E. Phillips	.07	1.30	\$1,455.00	\$1,891.50
NRM Nathaniel R. Miller	.07	1.30	\$810.00	\$1,053.00
CG Cecilia Guerrero	.07	5.90	\$595.00	\$3,510.50
JAL Jeffrey A. Liesemer	.11	56.70	\$1,520.00	\$86,184.00
KCM Kevin C. Maclay	.11	0.90	\$1,970.00	\$1,773.00
ACM Ann C. McMillan	.11	1.30	\$1,200.00	\$1,560.00
TEP Todd E. Phillips	.11	20.10	\$1,455.00	\$29,245.50
JPW James P. Wehner	.11	1.20	\$1,520.00	\$1,824.00
JRK Jeanna Rickards Koski	.11	7.40	\$955.00	\$7,067.00
NRM Nathaniel R. Miller	.11	72.00	\$810.00	\$58,320.00
AKH Ariel K. Hayes	.11	0.80	\$550.00	\$440.00
CG Cecilia Guerrero	.11	5.80	\$595.00	\$3,451.00
JAL Jeffrey A. Liesemer	.15	5.10	\$1,520.00	\$7,752.00
TEP Todd E. Phillips	.15	5.70	\$1,455.00	\$8,293.50
NRM Nathaniel R. Miller	.15	8.10	\$810.00	\$6,561.00
CG Cecilia Guerrero	.17	2.20	\$595.00	\$1,309.00
JAL Jeffrey A. Liesemer	.18	1.20	\$1,520.00	\$1,824.00

**BREAKDOWN BY PERSON**

<u>Person</u>	<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
NRM Nathaniel R. Miller	.18	2.20	\$810.00	\$1,782.00
CG Cecilia Guerrero	.18	3.40	\$595.00	\$2,023.00
			<u>205.00</u>	<u>\$228,186.00</u>