Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:20:00 Doce Main Document Page 1 of 22

CAPLIN & DRYSDALE, CHARTERED

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

Counsel for the Official Committee of Unsecured Creditors

MORGAN, LEWIS & BOCKIUS LLP

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

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

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

Special Insurance Counsel for the Official Committee of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

TENTH 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 MAY 1, 2025 THROUGH MAY 31, 2025

Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024
	[Docket No. 269]
Time Period Covered:	May 1, 2025 through May 31, 2025
Total Fees Requested:	\$52,773.60 (80% of \$65,967.00)
Total Expenses Requested:	\$2,498.80



Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 2 of 22

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

Pursuant to sections 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the "Local Rules"), and the Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief, entered September 9, 2024 [Docket No. 162] (the "Interim Compensation Order"), Morgan, Lewis & Bockius LLP ("Morgan Lewis"), as special insurance counsel for the Official Committee of Unsecured Creditors (the "Committee") of Hopeman Brothers, Inc. (the "Debtor"), hereby submits this monthly fee statement (the "Monthly Fee Statement") for the reasonable and necessary legal services rendered by Morgan Lewis for the period May 1, 2025 through May 31, 2025 (the "Fee Period") and reimbursement of the actual and necessary expenses that Morgan Lewis incurred during the Fee Period. By this Monthly Fee Statement, Morgan Lewis seeks payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$55,272.40, consisting of (i) \$52,773.60, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$2,498.80 for actual and necessary costs and expenses.

Itemization of Services Rendered and Disbursement Incurred

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

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

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 3 of 22

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

Representations

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

<u>Notice</u>

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

[Remainder of page left blank]

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 4 of 22

WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$55,272.40, consisting of (i) \$52,773.60, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$2,498.80 for actual and necessary costs and expenses.

Dated: July 7, 2025

By: <u>/s/ Brady Edwards</u>

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

ELECTRONICALLY FILED BY:

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

Counsel for the Official Committee of Unsecured Creditors

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 5 of 22

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

Task Code	Matter Description	Hours	Fees Requested
00	General	8.00	\$8,692.00
07	Fee Application – Self	4.70	\$5,010.00
10	Litigation	27.60	\$41,640.00
	Plan & Disclosure		
11	Statement	4.60	\$6,325.00
	Committee		
15	Meetings/Conferences	3.00	\$4,300.00
TOTAL		<u>47.90</u>	<u>\$65,967.00</u>

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 6 of 22

EXHIBIT B

Professionals Rendering Services During the Fee Period

The Morgan Lewis attorneys who rendered professional services in this chapter 11 case

during the Fee Period include:

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S.	Partner	1995	Litigation	\$1,375.00	19.90	\$27,362.50
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	3.30	\$6,682.50
Gallo, Andrew	Partner	2000	Finance	\$1,725.00	1.30	\$2,242.50
Nelson, James	Partner	2016	Litigation	\$1,175.00	1.90	\$2,232.50
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	13.80	\$21,390.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	1.30	\$1,105.00
Shim, David	Associate	2016	Finance	\$1,100.00	2.80	\$3,080.00
				Total	44.30	\$64,095.00

The Morgan Lewis paraprofessionals who rendered professional services in this chapter

11 case during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Guzzi, Tiffany A.	Paralegal	Litigation	\$520.00	3.60	\$1,872.00
			Total	3.60	\$1,872.00

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 7 of 22

EXHIBIT C

Summary of Expenses Incurred During the Fee Period

Туре	Expenses
Data Services – R	\$1,738.80
Westlaw	\$380.00
User Fees (Monthly) – Relativity	\$380.00
<u>Total</u>	\$2,498.80

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 8 of 22

EXHIBIT D

Invoices

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main

Document Page 9 of 22

Morgan Lewis

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

Invoice Date: June 16, 2025 Invoice Number 5688180 Account No. 139505-0001

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

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

Re: Hopeman Creditors Committee

Fees	\$ 65,967.00
Disbursements	\$ 2,498.80
Total Current Period Charges	\$ 68,465.80

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

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main

Document Page 10 of 22

Morgan Lewis

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

Invoice Date: June 16, 2025 Invoice Number 5688180 Account No. 139505-0001

REMITTANCE COPY

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

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

Re: Hopeman Creditors Committee

Fees	\$ 65,967.00
Disbursements	\$ 2,498.80
Total Current Period Charges	\$ 68,465.80

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

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

Remittance detail address cashapplication@morganlewis.com

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main

Document Page 11 of 22

Morgan Lewis

Morgan, Lewis & Bockius LLP 1000 Louisiana Street, Suite 4000 Houston, TX 77002-5005 **1**+1.713.890.5000 **G** +1.713.890.5001 www.morganlewis.com Fed Tax ID: 23-0891050

Detail of Outstanding Invoices

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

Invoice Date	Invoice Number	Invoice Amount	Payments/ Credits	Days Outstanding	Balance Due			
10/18/24	5530494	238,023.66	1,700.00	241	236,323.66			
11/15/24	5552180	309,570.64	1,700.00	213	307,870.64			
12/13/24	5570374	438,370.93	1,700.00	185	436,670.93			
01/10/25	5588017	84,074.65	0.00	157	84,074.65			
02/14/25	5608788	153,188.36	0.00	122	153,188.36			
03/17/25	5623718	103,323.58	0.00	91	103,323.58			
04/21/25	5644658	111,073.06	0.00	56	111,073.06			
05/13/25	5664512	51,054.70	0.00	34	51,054.70			
	TOTAL OUTSTANDING \$ 1 483 579 58							

IUIAL OUTSTANDING

\$ 1,483,579.58

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

Please send your remittance to: Morgan, Lewis & Bockius LLP P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050

Or please wire your remittance to: Wells Fargo Bank, N.A. ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S

For ACH transfers: ABA# 031000503 Acct# 2100010985563 Reference account number

Remittance detail address cashapplication@morganlewis.com

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 12 of 22

Morgan Lewis

June 16, 2025 Page 1

Invoice Number 5688180 Account No. 139505-0001

Detail for Fee Services Rendered

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
05/01/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
05/02/25	07	Fee Applications - Self	Revise draft monthly fee statement and exhibits.	Shim, D. K.	1,100.00	0.50	550.00
05/05/25	10	Litigation	Analyze Rule 2019 opposition.	Cox, D.S.	1,375.00	0.30	412.50
05/05/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
05/06/25	07	Fee Applications - Self	Correspond with MLB working group regarding fee application procedures and transferred time entries.	Shim, D. K.	1,100.00	0.50	550.00
05/07/25	10	Litigation	Prepare for and attend Eskin deposition conducted by Chubb insurers and confer with B. Edwards and T. Phillips regarding same.	Cox, D.S.	1,375.00	1.50	2,062.50
05/07/25	07	Fee Applications - Self	Review, analyze, and provide comments to draft fee application.	DeSantis, C. M.	850.00	0.50	425.00
05/07/25	10	Litigation	Work with Caplin team and D. Cox regarding strategy for Eskin deposition.	Edwards, B.	2,025.00	0.40	810.00
05/08/25	10	Litigation	Telephone conference with committee member's counsel regarding strategy.	Edwards, B.	2,025.00	0.40	810.00
05/08/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
05/09/25	15	Committee Meetings/Co nferences	Attend committee meeting.	Cox, D.S.	1,375.00	0.90	1,237.50
05/09/25	10	Litigation	Prepare for and attend committee meeting.	Edwards, B.	2,025.00	1.40	2,835.00

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 13 of 22

Morgan Lewis

June 16, 2025 Page 2

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
05/09/25	00	General	Attend Committee meeting.	Raskin, J. S.	1,550.00	1.00	1,550.00
05/11/25	10	Litigation	Analyze briefing regarding appointment of FCR and correspondence to N. Miller regarding same.	Cox, D.S.	1,375.00	0.50	687.50
05/12/25	10	Litigation	Analyze revisions to reply in support of appointment of future claims representative and confer with N. Miller regarding same.	Cox, D.S.	1,375.00	0.70	962.50
05/12/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
05/12/25	00	General	Analysis and comment on certain insurance statements in proposed to be filed documents (0.3); analysis and comment on certain objections filed by Liberty Mutual (1.8).	Raskin, J. S.	1,550.00	2.10	3,255.00
05/13/25	10	Litigation	Analyze Hopeman objection to Liberty claim and Committee joinder and exchange correspondence with N. Miller regarding same.	Cox, D.S.	1,375.00	0.40	550.00
05/13/25	07	Fee Applications - Self	Review draft monthly fee statement.	DeSantis, C. M.	850.00	0.40	340.00
05/13/25	07	Fee Applications - Self	Follow up with D. Shim and UCC counsel regarding monthly fee statement.	DeSantis, C. M.	850.00	0.30	255.00
05/14/25	10	Litigation	Analyze opposition to Rule 2019 motion and confer with N. Miller regarding same.	Cox, D.S.	1,375.00	0.20	275.00
05/14/25	00	General	Evaluate case pleadings and court orders.	Guzzi, T. A.	520.00	0.30	156.00

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 14 of 22

Morgan Lewis

June 16, 2025 Page 3

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
05/15/25	07	Fee Applications - Self	Follow up with UCC counsel regarding monthly fee statement.	DeSantis, C. M.	850.00	0.10	85.00
05/15/25	00	General	Evaluate case pleadings and notice of hearing.	Guzzi, T. A.	520.00	0.30	156.00
05/16/25	11	Plan & Disclosure Statement	Prepare for and conduct videoconference with FCR representatives regarding plan.	Cox, D.S.	1,375.00	0.40	550.00
05/16/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
05/16/25	00	General	Conference concerning plan and insurance issues.	Raskin, J. S.	1,550.00	0.80	1,240.00
05/18/25	11	Plan & Disclosure Statement	Prepare for call with FCR regarding insurance issues.	Cox, D.S.	1,375.00	1.20	1,650.00
05/19/25	11	Plan & Disclosure Statement	Prepare for and conduct videoconference with D. Salzman regarding plan issues and confer with Caplin team regarding same.	Cox, D.S.	1,375.00	1.70	2,337.50
05/19/25	07	Fee Applications - Self	Analyze consolidated brief in support of professional fee applications and exchange correspondence with D. Shim and N. Miller regarding same.	Cox, D.S.	1,375.00	0.60	825.00
05/19/25	10	Litigation	Analyze Chubb FCR appeal.	Edwards, B.	2,025.00	0.30	607.50
05/19/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
05/19/25	00	General	Conference with counsel to the Future Claims Representative.	Raskin, J. S.	1,550.00	0.50	775.00

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 15 of 22

Morgan Lewis

June 16, 2025 Page 4

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
05/19/25	07	Fee Applications - Self	Correspond with Caplin regarding MLB ninth monthly fee statement.	Shim, D. K.	1,100.00	0.10	110.00
05/19/25	07	Fee Applications - Self	Finalize MLB's ninth monthly fee statement.	Shim, D. K.	1,100.00	0.20	220.00
05/19/25	07	Fee Applications - Self	Correspond with MLB working group regarding MLB's third interim fee application.	Shim, D. K.	1,100.00	0.50	550.00
05/20/25	11	Plan & Disclosure Statement	Prepare correspondence to D. Salzman regarding coverage issues.	Cox, D.S.	1,375.00	1.00	1,375.00
05/20/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.40	208.00
05/20/25	07	Fee Applications - Self	Correspond with Caplin regarding fee hearing and proposed orders.	Shim, D. K.	1,100.00	0.30	330.00
05/20/25	07	Fee Applications - Self	Correspond with U.S. Trustee regarding MLB's third interim fee application.	Shim, D. K.	1,100.00	0.20	220.00
05/21/25	11	Plan & Disclosure Statement	Analyze Rule 2019 order and exchange correspondence with N. Miller regarding confirmation hearing.	Cox, D.S.	1,375.00	0.30	412.50
05/21/25	07	Fee Applications - Self	Draft the form of MLB's third interim fee proposed order.	Shim, D. K.	1,100.00	0.30	330.00
05/22/25	00	General	Evaluate various case pleadings and court orders.	Guzzi, T. A.	520.00	0.30	156.00
05/23/25	10	Litigation	Telephone conference with N. Miller regarding Liberty filing.	Cox, D.S.	1,375.00	0.20	275.00
05/23/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 16 of 22

Morgan Lewis

June 16, 2025 Page 5

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
05/24/25	10	Litigation	Analyze Liberty Mutual filing and related correspondence.	Edwards, B.	2,025.00	0.40	810.00
05/24/25	10	Litigation	Review and analyze correspondence regarding Liberty's motion to withdraw reference for declaratory judgment action.	Nelson, J.	1,175.00	0.20	235.00
05/24/25	10	Litigation	Communications concerning Liberty Mutual's motion to withdraw the reference on its adversary complaint.	Raskin, J. S.	1,550.00	1.80	2,790.00
05/25/25	10	Litigation	Analyze Liberty motion to withdraw reference.	Cox, D.S.	1,375.00	0.40	550.00
05/25/25	10	Litigation	Analyze correspondence in connection with formulation of strategy for Liberty Mutual adversary proceeding.	Edwards, B.	2,025.00	0.40	810.00
05/25/25	10	Litigation	Communications concerning Liberty Mutual's adversary complaint.	Raskin, J. S.	1,550.00	0.80	1,240.00
05/26/25	10	Litigation	Analyze Liberty Mutual filings and prepare correspondence to Caplin and MLB teams regarding same.	Cox, D.S.	1,375.00	0.70	962.50
05/26/25	10	Litigation	Analyze Liberty Mutual motion to withdraw the reference.	Nelson, J.	1,175.00	0.90	1,057.50
05/27/25	10	Litigation	Prepare for and conduct videoconference with Caplin and MLB teams regarding Liberty filings and videoconference with Debtor team regarding same.	Cox, D.S.	1,375.00	1.80	2,475.00

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 17 of 22

Morgan Lewis

June 16, 2025 Page 6

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
05/27/25	10	Litigation	Analyze motion to withdraw reference in adversary proceeding filed by Liberty Mutual and comment on same.	Gallo, A. J.	1,725.00	0.60	1,035.00
05/27/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
05/27/25	10	Litigation	Conference concerning Liberty Mutual's adversary proceeding.	Raskin, J. S.	1,550.00	0.60	930.00
05/27/25	10	Litigation	Analyze and comment on Liberty Mutual's adversary complaint.	Raskin, J. S.	1,550.00	0.60	930.00
05/28/25	10	Litigation	Confer with J. Raskin regarding Liberty filing.	Cox, D.S.	1,375.00	0.90	1,237.50
05/28/25	10	Litigation	Review key pleadings and call with B. Killian and J. Nelson to discuss motion to withdraw reference and adversary proceeding filed by Liberty Mutual.	Gallo, A. J.	1,725.00	0.70	1,207.50
05/28/25	00	General	Evaluate case pleadings and hearing notices.	Guzzi, T. A.	520.00	0.30	156.00
05/28/25	10	Litigation	Analyze Liberty Mutual motion and discuss strategy with A. Gallo and B. Killian.	Nelson, J.	1,175.00	0.80	940.00
05/28/25	10	Litigation	Analyze and comment on certain issues raised by Liberty Mutual's adversary complaint.	Raskin, J. S.	1,550.00	2.50	3,875.00

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 18 of 22

Morgan Lewis

June 16, 2025 Page 7

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
05/29/25	10	Litigation	Analyze case authority circulated by J. Raskin regarding jurisdictional issues arising from Liberty filing, research regarding same and videoconference with Caplin team regarding strategy regarding Liberty filings.	Cox, D.S.	1,375.00	2.80	3,850.00
05/29/25	10	Litigation	Communications and conference concerning Liberty Mutual's adversary proceeding and Liberty Mutual's discovery requests.	Raskin, J. S.	1,550.00	1.30	2,015.00
05/29/25	07	Fee Applications - Self	Correspond with Caplin regarding MLB third interim fee application.	Shim, D. K.	1,100.00	0.10	110.00
05/30/25	15	Committee Meetings/Co nferences	Prepare for and attend committee meeting regarding various plan issues.	Cox, D.S.	1,375.00	1.10	1,512.50
05/30/25	10	Litigation	Prepare for and conduct videoconference with Caplin team regarding Liberty strategy (1.0), prepare correspondence to K. Finnerty regarding service of Liberty complaint (.2), analyze Liberty and Chubb discovery (.4) and videoconference with Caplin team regarding same (.7).	Cox, D.S.	1,375.00	2.30	3,162.50
05/30/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
05/30/25	10	Litigation	Conference with Committee counsel concerning insurer discovery requests.	Raskin, J. S.	1,550.00	0.80	1,240.00

Morgan Lewis

June 16, 2025 Page 8

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
05/30/25	15	Committee Meetings/Co nferences	Attend Committee meeting.	Raskin, J. S.	1,550.00	1.00	1,550.00
05/30/25	07	Fee Applications - Self	Correspond with MLB working group regarding court order approving MLB third interim fee application.	Shim, D. K.	1,100.00	0.10	110.00
				Matter Total		47.90	\$ 65,967.00

Morgan Lewis

June 16, 2025 Page 9 Invoice Number 5688180 Account No. 139505-0001

Summary for Fee Services Rendered

		Hours	Rate	Amount
PARTNER				
Cox, D.S.		19.90	1,375.00	27,362.50
Edwards, B.		3.30	2,025.00	6,682.50
Gallo, A. J.		1.30	1,725.00	2,242.50
Nelson, J.		1.90	1,175.00	2,232.50
Raskin, J. S.		13.80	1,550.00	21,390.00
ASSOCIATE				
DeSantis, C. M.		1.30	850.00	1,105.00
Shim, D. K.		2.80	1,100.00	3,080.00
PARALEGAL				
Guzzi, T. A.		3.60	520.00	1,872.00
	Matter Total	47.90		\$ 65,967.00

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 21 of 22

Morgan Lewis

June 16, 2025 Page 10 Invoice Number 5688180 Account No. 139505-0001

Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
05/28/25	Raskin, Jeffrey S	WestLaw	380.00
05/30/25	Data Services, Data Services	Data Services Active - R fee; May; 86.94 GB	1,738.80
05/30/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; May; 4.00 User	380.00
		Total Disbursements	\$ 2,498.80

Case 24-32428-KLP Doc 946 Filed 07/07/25 Entered 07/07/25 15:29:00 Desc Main Document Page 22 of 22

Morgan Lewis

June 16, 2025 Page 11

=

Invoice Number 5688180 Account No. 139505-0001

Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description		Amount
Legal Research		380.00
Hosting		1,738.80
User Fees		380.00
	Total Disbursements	\$ 2,498.80