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*Counsel for Debtor and Debtor in Possession*

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

**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

:  
: **Chapter 11**  
:  
: **Case No. 24-32428 (KLP)**  
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**SUMMARY OF FOURTH INTERIM APPLICATION OF  
HUNTON ANDREWS KURTH LLP AS COUNSEL FOR  
THE DEBTOR AND DEBTOR IN POSSESSION**

<b>Basic Information</b>	
Name of Applicant:	Hunton Andrews Kurth 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:	March 1, 2025 to May 31, 2025
Total Hours Billed:	1,038.60
Total Fees Requested:	\$1,139,958.50
Total Expenses Requested:	\$11,532.54
Fees Requested Over Budget:	None
Blended Rate:	\$1,097.59/hour
Rate Increases Not Previously Approved/Disclosed:	1
Total Professionals:	10



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Total Professionals Not in Staffing Plan:	4
Total Professionals Billing Less Than 15 Hours:	4
<b>Historical</b>	
Fees Approved to Date by Interim Order:	\$3,274,561.50
Expenses Approved to Date by Interim Order:	\$63,834.86
Allowed Fees Paid to Date:	\$838,917.00
Allowed Expenses Paid to Date:	\$1,935.48
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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**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

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: **Chapter 11**  
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: **Case No. 24-32428 (KLP)**  
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**FOURTH INTERIM APPLICATION OF  
HUNTON ANDREWS KURTH LLP, COUNSEL FOR THE DEBTOR AND  
DEBTOR IN POSSESSION, FOR ALLOWANCE OF INTERIM COMPENSATION  
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM MARCH 1, 2025 THROUGH AND INCLUDING MAY 31, 2025**

Hunton Andrews Kurth LLP (“Hunton”), 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 Hunton to the Debtor for the period from March 1, 2025 through and including May 31, 2025 (the “Fourth Interim Application Period”), and reimbursement of actual and necessary expenses incurred by Hunton during the Fourth 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, Hunton 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 (the “U.S. Trustee”) 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 set forth therein (the “Compensation Procedures”).

7. On September 9, 2024, the Court entered the *Order Authorizing the Retention and Employment of Hunton Andrews Kurth LLP as Counsel for the Debtor Effective as of the Petition Date* [Doc. No. 163], authorizing the Debtor to employ and retain Hunton as its 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. The Compensation Procedures provide that the fourth interim fee application should cover the period from March 1, 2025 through and including May 31, 2025.

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. Hunton submits this Application (a) for interim allowance of reasonable compensation for the actual, reasonable and necessary professional services that it has rendered as counsel for the Debtor in this case for the period from March 1, 2025, through and including May 31, 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, Hunton seeks fees for services rendered in the amount of \$1,139,958.50. For the same period, Hunton seeks actual, reasonable and necessary expenses totaling \$11,532.54.

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 Hunton professionals and paraprofessionals engaged in the representation of the Debtor during the Fourth 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 Hunton during the Fourth Interim Application Period.
- (iv) Exhibit D contains a disclosure of “customary and comparable compensation” charged by Hunton’s 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 Hunton.
- (v) Exhibit E contains the budget and staffing plans for Hunton for this chapter 11 case during the Fourth Interim Application Period.
- (vi) Exhibit F contains the monthly fee statements properly served by Hunton during the Fourth Interim Application Period (the “Monthly Statement”).

#### IV. BASIS FOR RELIEF REQUESTED

13. During the Fourth Interim Application Period, Hunton provided numerous services to the Debtor, including but not limited to (i) drafting pleadings for the Debtor, including the Debtor's (a) 524(g) plan of reorganization (the "524(g) Plan") and corresponding disclosure statement [Docket Nos. 689, 690, 766, and 767], (b) joint solicitation procedures motion submitted by the Debtor and Committee (the "Solicitation Procedures Motion") [Docket No. 691], (c) motion for an expedited status conference to report the results of the Debtor's mediation with Committee counsel, the Chubb Insurers' counsel, and other interested parties [Docket No. 609], (d) reply in support of the Debtor's motion for entry of a third interim order extending the automatic stay to stay asbestos-related actions against non-Debtor defendants [Docket No. 611], (e) motion seeking approval of the stipulated order approving the settlement regarding the Roussel Claimants' appeal of the order approving the Debtor's settlement agreement with the Certain Settling Insurers and granting limited relief regarding the Third Interim Stay Order (defined below) (the "Roussel Appeal Settlement Approval Motion") [Docket No. 687], (f) joint application of the Debtor and Committee appointing the future claimants' representative (the "FCR") with respect to the 524(g) Plan (the "FCR Application") [Docket No. 688], (g) objections to numerous proofs of claim filed against the Debtor, including insurers Liberty Mutual's and Zurich's claims [Docket Nos. 694 and 809] and certain asbestos claimants' personal injury claims that were improperly filed [Docket Nos. 798-808]; (ii) analyzing objections filed in opposition to several of the Debtor's pleadings and, when applicable, drafting responses in support of the relief requested in such pleadings, including the Debtor's (a) Solicitation Procedures Motion [Docket No. 759], (b) FCR Application [Docket No. 722], and (c) Second Exclusivity Motion; (iii) analyzing the Chubb Insurers' objections to certain monthly fee statements [Docket No. 651] and interim fee applications [Docket No. 702] that were filed by the Debtor's retained professionals and drafting

a reply in support of the Debtor's professionals' interim fee applications [Docket No. 760]; (iv) working to obtain the entry of: (a) the order extending the Debtor's exclusivity period [Docket No. 623], (b) the third interim order extending the automatic stay to asbestos-related actions against non-Debtor defendants (the "Third Interim Stay Order") [Docket No. 622], (c) the orders approving interim compensation of certain of the Debtor's professionals (which were contested) [Docket Nos. 786-788], (d) the order approving the Debtor's solicitation procedures and conditionally approving the disclosure statement [Docket No. 782], (e) the order approving the appointment of the FCR [Docket No. 732], and (f) other orders necessary for the Debtor to administer this chapter 11 case; (v) addressing the Chubb Insurers' adversary complaint filed against the Debtor regarding the alleged breach of the Debtor's settlement agreement with the Chubb Insurers [Docket No. 671], including drafting a motion to dismiss the same; (vi) addressing the Roussel Claimants' appeal of the order approving the settlement agreement with the Certain Settling Insurers and ultimately negotiating a resolution with counsel regarding the same, which resulted in the Roussel Appeal Settlement Approval Motion [Docket No. 733]; (vii) addressing Liberty Mutual's adversary proceeding filed against the Debtor and preparing the Debtor's (a) motion to dismiss the same and (b) objection to Liberty Mutual's motion to withdraw the reference; (viii) engaging in extensive discovery related work, largely resulting from discovery requests served on the Debtor by the Chubb Insurers and Liberty Mutual; (ix) preparing for and participating in the deposition of the proposed FCR in connection with the FCR Application and the objection regarding the same; (x) participating in conferences with the Debtor and the Debtor's other professionals regarding items including, but not limited to, administrative, organizational, strategic, and contested issues arising in this case; (xi) communicating regularly with the Committee's professionals regarding items including case strategy and timeline, pending motions

of the Debtor's, and various other substantive issues related to the status and administration of this case, including the 524(g) Plan and corresponding disclosure statement; (xii) communicating with creditors, other parties in interest, and their professionals, as applicable, regarding this case; (xiii) assisting in the day-to-day administration of this case for the Debtor; (xiv) regularly communicating with the Clerk's office, Chambers, and the U.S. Trustee's office regarding various case administration issues; and (xv) preparing for and participating in court hearings, most of which involved Hunton arguing in support of various contested pleadings of the Debtor's.

14. In performing the services detailed in this Application, Hunton 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, Hunton properly filed and served three Monthly Statements during the Fourth 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>
Mar. 1, 2025 – Mar. 31, 2025	\$328,237.00	\$2,443.30	4/28/2025 [Docket No. 679]	5/12/2025	\$0.00	\$0.00
Apr. 1, 2025 – Apr. 30, 2025	\$266,450.00	\$2,338.33	5/28/2025 [Docket No. 811]	6/11/2025	\$0.00	\$0.00
May 1, 2025 – May 31, 2025	\$545,271.50	\$6,750.91	7/15/2025 [Docket No. 990]	7/29/2025	\$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 Hunton's Monthly Statements are attached hereto as Exhibit F.

17. Hunton has endeavored to represent the Debtor in the most expeditious and economical manner possible. Tasks have been assigned to attorneys and paralegals at Hunton so that the work has been performed by those most familiar with the particular matter or task and, where attorney involvement was required, by the lowest hourly rate professional appropriate for a particular matter. Moreover, Hunton 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. Hunton believes it has been successful in this regard.

18. No agreement or understanding exists between Hunton 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: No.

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

Response: Not applicable.

**Question:** Have any of the professionals included in this fee application varied their hourly

rate based on the geographic location of the bankruptcy case?

Response: No.

**Question:** Does 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: This Application includes approximately \$9,881.50 in fees (13.4 hours) relating to preparing, reviewing, or revising Monthly Statements. These fees are reflected in Task Code 160 time entries. Hunton submits that all such fees are reasonable and necessary for preparing the Monthly Statements.

**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: As set forth above, this Application includes approximately \$9,881.50 in fees (13.4 hours) relating to preparing, reviewing, or revising Monthly Statements. In the course of such efforts, Hunton reviewed and edited various entries to avoid publicly disclosing any privileged or confidential information. Hunton submits that such review and edits are a reasonable and necessary part of Hunton's preparation of the Monthly Statements.

**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. As disclosed in the Brown Declaration, the Debtor agreed to retain Hunton in accordance with its standard terms and conditions which, among other things, provide that the billing rates are subject to periodic adjustments. In accordance with Hunton's established billing practices and procedures and, following the Debtor's review and approval, certain of Hunton's billing rates for this engagement were increased effective as of January 1, 2025.

## **VI. Notice**

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

*[Remainder of page intentionally left blank]*

**WHEREFORE**, Hunton respectfully requests that this Court enter an Order, substantially in the form attached hereto (i) approving this Application, (ii) providing that Hunton be allowed on an interim basis the sum of \$1,139,958.50, as compensation for reasonable and necessary professional services rendered to the Debtor and the sum of \$11,532.54 for reimbursement of actual and necessary costs and expenses, (iii) authorizing and directing the Debtor to pay Hunton the outstanding amount of such sums, and (iv) for such other relief as the Court deems proper and just.

Dated: July 15, 2025  
Richmond, Virginia

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

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

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*Counsel for Debtor and Debtor in Possession*

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

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**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

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: **Chapter 11**  
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: **Case No. 24-32428 (KLP)**  
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**ORDER GRANTING FOURTH INTERIM APPLICATION OF  
HUNTON ANDREWS KURTH LLP, COUNSEL FOR THE DEBTOR  
AND DEBTOR IN POSSESSION, FOR ALLOWANCE OF INTERIM COMPENSATION  
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM  
MARCH 1, 2025 THROUGH AND INCLUDING MAY 31, 2025**

Upon consideration of the Fourth Interim Fee Application (the “Application”)<sup>1</sup> of Hunton Andrews Kurth LLP (“Hunton”), counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), for the period from March 1, 2025, through and including May 31, 2025 (the “Fourth Interim Application Period”); and the Court having reviewed the Application and the Monthly Statements that were served by Hunton during the Fourth Interim Application Period, and finding that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334,

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

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 sufficient cause appearing therefore,

IT IS HEREBY ORDERED that:

1. The Application is GRANTED.
2. Hunton is allowed interim compensation in the amount of \$1,139,958.50 and reimbursement of expenses in the amount of \$11,532.54 for the Fourth Interim Application Period as requested in the Application.
3. The Debtor is authorized and directed to disburse to Hunton payment in the amount of the difference between the allowed amounts and the actual monthly payments previously received by Hunton for fees and expenses incurred during the Fourth 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)  
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*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**

(March 1, 2025 – May 31, 2025)

<b>Name of Professional</b>	<b>Position</b>	<b>Department</b>	<b>First Bar Admission Date</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>	<b>Rate Increases Since the Petition Date</b>
T. P. Brown	Partner	1987	Bankruptcy	\$1,485	329.50	\$489,307.50	1
J. W. Harbour	Partner	2001	Bankruptcy	\$1,325	1.3	\$1,859.00	None
J. P. Rovira	Partner	2008	Bankruptcy	\$1,100	60.1	\$66,110.00	1
G. B. Fehling	Partner	2011	Insurance Coverage	\$1,200	1.0	\$1,200.00	None
H. P. Long III	Counsel	2007	Bankruptcy	\$1,025	446.9	\$458,072.50	1
C. A. Rankin	Associate	2018	Bankruptcy	\$895	42.6	\$38,127.00	1
N. S. Monico	Associate	2023	Bankruptcy	\$695	66.7	\$46,356.50	None
K. T. Bailey	Associate	2023	Bankruptcy	\$690	0.6	\$414.00	1
R. Rubin	Associate	2025	Bankruptcy	\$695	5.8	\$4,031.00	None
T. L. Canada	Paralegal	N/A	Bankruptcy	\$410	84.1	\$34,481.00	1
				<b>Total:</b>	<b>1,038.6</b>	<b>\$1,139,958.50</b>	
<b>Blended Rate:</b>					<b>\$1,097.59</b>		

**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY**  
(March 1, 2025 – May 31, 2025)

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
B110	Case Administration	51.8	\$33,853.00
B150	Meetings of and Communications with Creditors	5.4	\$5,828.00
B160	Fee / Employment Applications	66.1	\$57,195.50
B170	Fee / Employment Objections	15.9	\$17,999.00
B190	Other Contested Matters (excluding assumption / rejection motions)	504.5	\$585,127.50
B210	Business Operations	7.4	\$7,696.50
B310	Claims Administration and Objections	84.8	\$84,866.50
B320	Plan and Disclosure Statement (including Business Plan)	302.7	\$347,392.50
	<b>Total:</b>	<b>1,038.6</b>	<b>\$1,139,958.50</b>

**Exhibit C**

**EXPENSE SUMMARY**  
(March 1, 2025 – May 31, 2025)

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Unit Cost (if applicable)</b>	<b>Total Expenses</b>
Online Research	(Pacer Service Fees from 01/01/2025 to 03/31/2025)		\$109.70
Online Research	Westlaw and Lexis		\$4,001.54
Local Travel			\$41.00
Deposition Transcripts			\$630.60
Trial Transcripts			\$614.15
Copying			\$375.70
Litigation Support Vendors			\$5,759.85
		<b>Total:</b>	<b>\$11,532.54</b>

**Exhibit D**

**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**  
(March 1, 2025 – May 31, 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)	\$1,024.27	\$1,425.05
Counsel	\$858.89	\$1,025.00
Associate (4-6 years since first admission)	\$639.27	\$895.00
Jr. Associate (1-3 years since first admission)	\$589.51	\$694.96
Paralegal	\$375.96	\$410.00
<b>Aggregated (Blended Rates):</b>	<b>\$810.22</b>	<b>\$1,097.59</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 Hunton’s last completed calendar year ending December 31, 2024.

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 Hunton 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**  
**HUNTON ANDREWS KURTH LLP**  
(March 1, 2025 – May 31, 2025)

<b>Period</b>	<b>Estimated Fees</b>
March 1, 2025 – May 31, 2025	\$1,075,000

**STAFFING PLAN**  
**HUNTON ANDREWS KURTH LLP**  
(March 1, 2025 – May 31, 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	2	\$1,175.00
Counsel	1	\$930.00
Associates	2	\$697.50
Paralegal	1	\$390.00

**Exhibit F**

**HUNTON ANDREWS KURTH LLP**

Joseph P. Rovira (admitted *pro hac vice*)  
Catherine A. Rankin (admitted *pro hac vice*)  
600 Travis Street, Suite 4200  
Houston, Texas 77002  
Telephone: (713) 220-4200

**HUNTON ANDREWS KURTH LLP**

Tyler P. Brown (VSB No. 28072)  
Henry P. (Toby) Long, III (VSB No. 75134)  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219  
Telephone: (804) 788-8200

*Counsel for Debtor and Debtor in Possession*

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

**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

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

**EIGHTH MONTHLY FEE STATEMENT OF  
HUNTON ANDREWS KURTH LLP AS BANKRUPTCY COUNSEL  
FOR THE DEBTOR FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM MARCH 1, 2025 THROUGH AND INCLUDING MARCH 31, 2025**

Name of Applicant:	Hunton Andrews Kurth 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. 163]
Time Period Covered:	March 1, 2025 through March 31, 2025
Total Fees Requested:	\$262,589.60 (80% of \$328,237.00)
Total Expenses Requested:	\$2,443.30
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 Hunton Andrews Kurth LLP (“Hunton”), 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 Hunton for the period from March 1, 2025 through and including March 31, 2025 (the “Fee Period”) and reimbursement of the actual and necessary expenses that Hunton incurred during the Fee Period. By this Monthly Fee Statement, Hunton seeks allowance of compensation for services rendered in the amount of \$328,237.00 and payment in the amount of \$262,589.60 (which equals 80% of the compensation sought herein). Hunton also seeks allowance and reimbursement of actual and necessary expenses in the amount of \$2,443.30.

**Itemization of Services Rendered and Disbursements Incurred**

1. In support of this Monthly Fee Statement, Hunton 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 Hunton professionals and paraprofessionals engaged in the representation of the Debtor during the Fee Period.
  - **Exhibit C** is a summary of the expenses incurred by Hunton during the Fee Period.
  - **Exhibit D** is a detailed invoice for the hours expended and fees incurred by Hunton 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. Hunton 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, Hunton respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$265,032.90, consisting of (i) \$262,589.60, which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Hunton during the Fee Period, and (ii) \$2,443.30 for actual and necessary costs and expenses.

*[Remainder of Page Intentionally Left Blank]*

Dated: April 28, 2025  
Richmond, Virginia

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

Tyler P. Brown (VSB No. 28072)

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

**HUNTON ANDREWS KURTH LLP**

Riverfront Plaza, East Tower

951 East Byrd Street

Richmond, Virginia 23219

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Facsimile: (804) 788-8218

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

[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**

600 Travis Street, Suite 4200

Houston, TX 77002

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

*Counsel for 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>
B110	Case Administration	18.2	\$12,683.50
B150	Meetings of and Communications with Creditors	4.7	\$5,064.50
B160	Fee / Employment Applications	22.3	\$21,845.50
B170	Fee / Employment Objections	0.1	\$148.50
B190	Other Contested Matters (excluding assumption / rejection motions)	124.5	\$155,347.50
B210	Business Operations	2.1	\$2,264.50
B310	Claims Administration and Objections	23.8	\$21,400.00
B320	Plan and Disclosure Statement (including Business Plan)	96.5	\$109,483.00
<b>Total</b>		<b>292.2</b>	<b>\$328,237.00</b>

**EXHIBIT B**

**Professionals Rendering Services during the Fee Period**

The Hunton attorneys who rendered professional services in these cases during the Fee Period include:

Professional	Position	Year Admitted	Expertise	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. P. Brown	Partner	1987	Bankruptcy	\$1,485	100.1	\$148,648.50
J. W. Harbour	Partner	2001	Bankruptcy	\$1,430	0.2	\$286.00
J. P. Rovira	Partner	2008	Bankruptcy	\$1,100	18.4	\$20,240.00
H. P. Long III	Counsel	2007	Bankruptcy	\$1,025	131.0	\$134,275.00
C. A. Rankin	Associate	2018	Bankruptcy	\$895	7.6	\$6,802.00
N. S. Monico	Associate	2023	Bankruptcy	\$695	12.9	\$8,965.50
<b>Totals</b>					<b>270.2</b>	<b>\$319,217.00</b>

Hunton paraprofessionals who rendered professional services in these cases during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. L. Canada	Paralegal	Bankruptcy	\$410	22.0	\$9,020.00
<b>Totals</b>				<b>22.0</b>	<b>\$9,020.00</b>

**EXHIBIT C**

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

Type	Expenses
Copying	\$365.00
Online Research	\$95.00
Trial Transcripts	\$54.00
Litigation Support Vendors	\$1,929.30
<b>TOTAL EXPENSES:</b>	<b>\$2,443.30</b>

**EXHIBIT D**

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

# HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP  
600 TRAVIS, STE. 4200  
HOUSTON, TX 77002

TEL 713 • 220 • 4200

EIN 54-0572269

## INVOICE SUMMARY

Hopeman Brothers, Inc.  
Attn: Christopher Lascell  
6 Auburn Court  
Brookline, MA 02446-6380

FILE NUMBER: 040312.0000007  
INVOICE NUMBER: 131824451  
DATE: 04/28/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending March 31, 2025 per the attached itemization:

## CURRENT INVOICE SUMMARY:

### RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring

Current Fees:	\$ 328,237.00
Current Charges:	2,443.30
<b>CURRENT INVOICE AMOUNT DUE:</b>	<b>\$ 330,680.30</b>

TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

FOR BILLING INQUIRIES, PLEASE CALL: 804-788-8555

To Pay By Mail:  
HUNTON ANDREWS KURTH LLP  
PO BOX 405759  
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:  
Bank: Truist Bank, Richmond, VA  
Account Name: Hunton Andrews Kurth LLP Operating  
Account Number: 001458094  
ABA Transit: 061000104  
Swift Code (International): SNTRUS3A  
Information with Wire: File: 040312.0000007, Inv: 131824451, Date: 04/28/2025

# HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP  
600 TRAVIS, STE. 4200  
HOUSTON, TX 77002

TEL 713 • 220 • 4200

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## INVOICE SUMMARY-REMITTANCE PAGE

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To Pay By Mail:  
HUNTON ANDREWS KURTH LLP  
PO BOX 405759  
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:  
Bank: Truist Bank, Richmond, VA  
Account Name: Hunton Andrews Kurth LLP Operating  
Account Number: 001458094  
ABA Transit: 061000104  
Swift Code (International): SNTRUS3A  
Information with Wire: File: 040312.0000007, Inv: 131824451, Date: 04/28/2025

# HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP  
600 TRAVIS, STE. 4200  
HOUSTON, TX 77002

TEL 713 • 220 • 4200

EIN 54-0572269

## INVOICE DETAIL

Hopeman Brothers, Inc.  
Attn: Christopher Lascell  
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Brookline, MA 02446-6380

FILE NUMBER: 040312.0000007  
INVOICE NUMBER: 131824451  
DATE: 04/28/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

## RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring

### FOR PROFESSIONAL SERVICES RENDERED THROUGH MARCH 31, 2025:

DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/03/2025	H P LONG, III	B110	Communications with chambers regarding March 5 hearing and Zoom access for the same	0.20	205.00
03/03/2025	T L CANADA	B110	Electronically file certificate of service of doc. no. 581	0.10	41.00
03/03/2025	T L CANADA	B110	Continue work on Agenda for March 5th hearing	0.90	369.00
03/04/2025	T L CANADA	B110	Finalize and electronically file Notice of Adjournment to March 5th hearing	0.50	205.00
03/04/2025	T L CANADA	B110	Prepare hearing materials for March 5, 2025 Hearing	3.00	1,230.00
03/05/2025	H P LONG, III	B110	Multiple communications with chambers regarding adjourning hearing (.40) and prepare and file notice of adjournment (.50)	0.90	922.50
03/05/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
03/06/2025	H P LONG, III	B110	Communications with counsel to party in interest regarding March 10 hearing time	0.20	205.00
03/06/2025	H P LONG, III	B110	Analyze and comment on agenda for March 10 hearing	0.60	615.00

HUNTON ANDREWS KURTH LLP  
 CLIENT NAME: Hopeman Brothers, Inc.  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/06/2025	T L CANADA	B110	Electronically file certificate of service of doc. nos. 585, 586, 587, 588, 589	0.20	82.00
03/07/2025	T L CANADA	B110	Finalize and electronically file Agenda and the Witness and Exhibit List for the March 10th hearing	0.30	123.00
03/07/2025	T L CANADA	B110	Prepare hearing notebook for March 10th hearing	1.00	410.00
03/10/2025	H P LONG, III	B110	Communications with chambers regarding omnibus hearing dates and analyze related issues (.40) and analyze and finalize notice of the same (.20)	0.60	615.00
03/10/2025	T L CANADA	B110	Prepare hearing materials and exhibits in anticipation of March 10th hearing	1.00	410.00
03/10/2025	T L CANADA	B110	Finalize and submit orders granting Third Stay Order and Second Exclusivity Order	0.50	205.00
03/10/2025	T L CANADA	B110	Electronically file certificate of service of doc. nos. 609, 610, 611, 612, and 613	0.20	82.00
03/10/2025	T L CANADA	B110	Prepare and electronically file Notice of Additional Omnibus Hearing Dates for April through June	0.20	82.00
03/11/2025	T L CANADA	B110	Analysis of orders entered by the Court and communications with claims agent regarding service	0.10	41.00
03/11/2025	J P ROVIRA	B110	Prepare for and participate in weekly call with Stout team.	1.00	1,100.00
03/11/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
03/11/2025	T L CANADA	B110	Electronically file certificates of service for doc. nos. 597 and 604	0.20	82.00
03/11/2025	C A RANKIN	B110	Prepare for and attend weekly standing Hunton/Stout call.	0.70	626.50

HUNTON ANDREWS KURTH LLP  
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 DATE: 04/28/2025  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/12/2025	H P LONG, III	B110	Analyze issues related to March 20 omnibus hearing and strategy related to same	0.50	512.50
03/12/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
03/13/2025	T L CANADA	B110	Electronically file certificate of service of doc. no. 614	0.10	41.00
03/13/2025	T L CANADA	B110	Prepare draft of Notice of Adjournment of Chubb Settlement Motion hearing	0.70	287.00
03/14/2025	T L CANADA	B110	Communications with Court regarding transcript of March 10, 2025 Hearing	0.20	82.00
03/17/2025	T P BROWN	B110	Email to J.Rovira re adjournment of March 20 hearing	0.10	148.50
03/17/2025	H P LONG, III	B110	Communications with US Trustee regarding March 20 hearing and analyze issues related to March 20 hearing	0.50	512.50
03/17/2025	H P LONG, III	B110	Analyze certificates of service and communications with Verita regarding the same	0.30	307.50
03/18/2025	H P LONG, III	B110	Communications with chambers regarding cancellation of March 20 omnibus hearing	0.20	205.00
03/18/2025	T L CANADA	B110	Finalize and electronically file Notice of Adjournment of Matter Scheduled for Hearing on March 20, 2025	0.20	82.00
03/18/2025	T P BROWN	B110	Conference with T.Long re cancellation of 3/20 hearing	0.10	148.50
03/19/2025	T P BROWN	B110	Conference with T.Long re adjournment of 3/20 hearing	0.10	148.50
03/20/2025	T L CANADA	B110	Electronically file certificates of service of doc. nos. 616, 618, 622, and 623	0.30	123.00

HUNTON ANDREWS KURTH LLP  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/25/2025	J P ROVIRA	B110	Prepare for and participate in weekly call with Stout to go over open issues.	0.80	880.00
03/25/2025	C A RANKIN	B110	Prepare for and participate in weekly Hunton/Stout conference to discuss works in progress.	0.50	447.50
03/25/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
03/26/2025	T L CANADA	B110	Electronically file certificate of service of doc. no. 631	0.10	41.00
03/27/2025	T L CANADA	B110	Electronically file certificate of service of doc. no. 635	0.10	41.00
03/27/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
			<b>TOTAL B110</b>	<b>18.20</b>	
03/10/2025	C A RANKIN	B150	Analyze inbound from SCS regarding third party requesting data access for reporting and respond to SCS regarding same.	0.20	179.00
03/10/2025	T P BROWN	B150	Emails with Liberty's counsel re proposed call	0.10	148.50
03/12/2025	T P BROWN	B150	Prepare for call with LMIC and review POC and underlying agreements	1.20	1,782.00
03/18/2025	H P LONG, III	B150	Analyze and respond to questions from D. Cox regarding parties subject to confidentiality agreements and information that can be shared with such parties	0.30	307.50
03/18/2025	H P LONG, III	B150	Analyze and respond to questions from N. Miller at Caplin regarding filed proof of claim	0.40	410.00

HUNTON ANDREWS KURTH LLP  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/25/2025	C A RANKIN	B150	Analyze and address various Committee inbounds regarding diligence requests (.5), and analyze open items regarding Committee diligence requests (.6).	1.10	984.50
03/25/2025	C A RANKIN	B150	Draft summary of numerous inbounds from creditors and parties in interest with summaries of reach out/dispute resolution status.	1.40	1,253.00
			<b>TOTAL B150</b>	<b>4.70</b>	
03/11/2025	H P LONG, III	B160	Analyze and update parties in interest list for retention of Future Claims Representative (.60), and communications with counsel to Committee regarding the same (.30)	0.90	922.50
03/11/2025	T P BROWN	B160	Work on FCR application and order and review other cases for precedent	1.20	1,782.00
03/11/2025	T P BROWN	B160	Emails with N.Miller re FCR application and order exemplar and review same	0.10	148.50
03/12/2025	T P BROWN	B160	Work on FCR application and review related precedent	1.60	2,376.00
03/13/2025	T L CANADA	B160	Communications with C. Rankin regarding Third Interim Fee Application (.2) and prepare Third Interim Fee Application (1.7)	1.90	779.00
03/13/2025	T P BROWN	B160	Work on FCR appointment application and proposed order and review precedent	1.70	2,524.50
03/13/2025	T P BROWN	B160	Emails with N.Miller and review online CV information on proposed FCR	0.30	445.50
03/13/2025	C A RANKIN	B160	Analyze upcoming interim fee application deadline and email debtors' professionals regarding same.	0.20	179.00

HUNTON ANDREWS KURTH LLP  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/18/2025	C A RANKIN	B160	Analyze Stout's February monthly fee statement.	0.20	179.00
03/20/2025	T P BROWN	B160	Work on FCR application and related conferences and emails with T.Long re same	0.80	1,188.00
03/20/2025	H P LONG, III	B160	Analyze and comment on application to appoint future claimants representative	1.10	1,127.50
03/20/2025	C A RANKIN	B160	Analyze open items regarding Blank Rome February fee statement and emails with K. Brinkman regarding same (.3); analyze open items regarding CKSMM February fee statement and email T. Rader regarding same (.4).	0.70	626.50
03/21/2025	T P BROWN	B160	Review and provide comments on solicitation motion	1.50	2,227.50
03/21/2025	T P BROWN	B160	Review MLB fee statement	0.10	148.50
03/25/2025	T P BROWN	B160	Email from R.Barrett re fee statement for February	0.10	148.50
03/26/2025	H P LONG, III	B160	Analyze revisions from Committee to application for future claimants' representative	1.20	1,230.00
03/27/2025	H P LONG, III	B160	Analyze and comment on declaration in support of application of future claimants' representative	0.80	820.00
03/27/2025	T P BROWN	B160	Review committee email re proposed FCR candidate's declaration	0.20	297.00
03/27/2025	T L CANADA	B160	Work on Hunton's February monthly fee statement	1.60	656.00
03/27/2025	C A RANKIN	B160	Analyze and address open items regarding Hunton's February fee statement (.8) review February fee statement and circulate same to T. Brown (.2).	1.00	895.00

HUNTON ANDREWS KURTH LLP  
 CLIENT NAME: Hopeman Brothers, Inc.  
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 DATE: 04/28/2025  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/29/2025	T P BROWN	B160	Review Hunton February fee statement and related email to C.Rankin	0.50	742.50
03/31/2025	T P BROWN	B160	Review fee statements and related emails with P.Barrett	0.30	445.50
03/31/2025	T L CANADA	B160	Work on Hunton's Third Interim fee application	2.50	1,025.00
03/31/2025	T L CANADA	B160	Email LEDES files for Hunton, Blank Rome, and CKSMM to the US Trustee	0.20	82.00
03/31/2025	T L CANADA	B160	Finalize and electronically file 7th monthly fee statements of Hunton, Blank Rome, CKSMM, and Stout	1.20	492.00
03/31/2025	C A RANKIN	B160	Analyze and proposed edits to Kutak's February fee statement (.2) coordinate filing of Hunton, Stout, Blank Rome, and CKSMM February fee statements (.2).	0.40	358.00
			<b>TOTAL B160</b>	<b>22.30</b>	
03/31/2025	T P BROWN	B170	Review Chubb objection to FTI fee statement	0.10	148.50
			<b>TOTAL B170</b>	<b>0.10</b>	
03/01/2025	T P BROWN	B190	Review emails re term sheet discussions with committee counsel and P.Barrett and review comments	0.50	742.50
03/02/2025	T P BROWN	B190	Review emails from and to committee counsel and debtor's counsel re proposed changes to settlement term sheet	0.40	594.00
03/03/2025	T P BROWN	B190	Participate in call with committee counsel and debtor counsel re term sheet revisions	0.80	1,188.00
03/03/2025	T P BROWN	B190	Emails to and from R.Van Epps re hearing prep and term sheet discussions	0.20	297.00

HUNTON ANDREWS KURTH LLP  
 CLIENT NAME: Hopeman Brothers, Inc.  
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 DATE: 04/28/2025  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/03/2025	T P BROWN	B190	Review and revise witness and exhibit list and consider related strategy	0.40	594.00
03/03/2025	T P BROWN	B190	Work on term sheet revisions and related discussions	0.40	594.00
03/03/2025	T P BROWN	B190	Prepare for 3/5 hearings on extension motions	1.60	2,376.00
03/03/2025	T P BROWN	B190	Review and revise proposed reply brief in support of motions	1.30	1,930.50
03/03/2025	T P BROWN	B190	Review response of Chubb re exclusivity and consider related arguments	1.80	2,673.00
03/03/2025	T P BROWN	B190	Review objections to stay extension motion and consider responses	1.40	2,079.00
03/03/2025	T P BROWN	B190	Conference with J.Rovira re term sheet discussions and related emails with J.Rovira	0.50	742.50
03/03/2025	J W HARBOUR	B190	Analysis of term sheet and related issues including concerning upcoming hearing and communications with counsel	0.20	286.00
03/03/2025	J P ROVIRA	B190	Prepare for and participate in mediation call (.6); attention to correspondence related to finalizing term sheet (.8); multiple follow up discussions related to same (.4).	1.80	1,980.00
03/03/2025	H P LONG, III	B190	Analyze and work on omnibus reply in support of third interim stay extension order	4.80	4,920.00
03/03/2025	H P LONG, III	B190	Analyze revisions to settlement term sheet and related strategy (1.10) and prepare for and participate in call with Committee professionals related to same (.60)	1.70	1,742.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/03/2025	H P LONG, III	B190	Analyze issues related to exhibits and witnesses for March 5 hearing (.90), and communications with K. Courington regarding the same (.40)	1.30	1,332.50
03/03/2025	T P BROWN	B190	Call with mediator and related emails to P.Barrett and J.Rovira re proposed call	0.30	445.50
03/03/2025	T P BROWN	B190	Call with P.Barrett, J.Rovira and T.Long re strategy after committee call	0.30	445.50
03/03/2025	T P BROWN	B190	Conference with J.Harbour re exclusivity issue for 3/5 hearing	0.20	297.00
03/03/2025	T P BROWN	B190	Conference with T.Long re reply strategy and evidence needed	0.30	445.50
03/04/2025	T P BROWN	B190	Emails with R.Van Epps re alternative term sheet provision on CIP agreements	0.20	297.00
03/04/2025	T P BROWN	B190	Review prior settlement agreement for revision to term sheet provision	0.50	742.50
03/04/2025	T P BROWN	B190	Emails with C.Lascell re term sheet revisions	0.10	148.50
03/04/2025	T P BROWN	B190	Emails with committee and T.Long re adjournment request and chambers call	0.20	297.00
03/04/2025	T P BROWN	B190	Work on witness/exhibit list for hearings	0.10	148.50
03/04/2025	H P LONG, III	B190	Prepare for and participate in call with mediator (.80) and analyze revisions to settlement term sheet (1.10)	1.90	1,947.50
03/04/2025	H P LONG, III	B190	Communications with chambers regarding adjourning March 5 hearing	0.40	410.00
03/04/2025	H P LONG, III	B190	Analyze and respond to questions from Committee counsel regarding exhibit to settlement term sheet	0.60	615.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/04/2025	H P LONG, III	B190	Prepare for March 5 hearing (1.40), and communications with K. Courington regarding the same (.40)	1.80	1,845.00
03/04/2025	H P LONG, III	B190	Analyze and update motion for expedited status conference on mediation	1.10	1,127.50
03/04/2025	H P LONG, III	B190	Analyze and work on omnibus reply in support of third interim stay order	1.30	1,332.50
03/04/2025	J P ROVIRA	B190	Prepare for and participate in call relating to settlement (.5); attention to correspondence related to finalizing same (.9).	1.40	1,540.00
03/04/2025	T P BROWN	B190	Emails with K.Courington on La. lawsuits and depositions to perpetuate testimony	0.20	297.00
03/04/2025	T P BROWN	B190	Revise term sheet to address committee/trust indemnity issues	0.60	891.00
03/04/2025	T P BROWN	B190	Numerous emails with P.Barrett re term sheet revisions and related strategy	0.30	445.50
03/04/2025	T P BROWN	B190	Call with mediator re status of committee consideration and comments on term sheet	0.50	742.50
03/04/2025	T P BROWN	B190	Prepare for hearings on 3/6 and review cases cited by objectors	2.40	3,564.00
03/04/2025	T P BROWN	B190	Revise proposed adjournment notice and related conference with T.Canada and T.Long	0.20	297.00
03/04/2025	T P BROWN	B190	Conference with J.Rovira re changes to term sheet requested by committee counsel	0.30	445.50
03/04/2025	T P BROWN	B190	Prepare for and participate in call with mediator and committee	1.00	1,485.00

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03/04/2025	T P BROWN	B190	Revise proposed reply brief on extension motions	0.70	1,039.50
03/04/2025	T P BROWN	B190	Telephone calls with P.Barrett re term sheet discussions and mediator call	0.40	594.00
03/04/2025	T P BROWN	B190	Conferences with T.Long re agenda, witness and exhibit list and mediator call	0.40	594.00
03/05/2025	N S MONICO	B190	Analyze state court dockets regarding prepetition crossclaims	0.20	139.00
03/05/2025	T P BROWN	B190	Emails with mediator re term sheet and hearing issues	0.30	445.50
03/05/2025	T P BROWN	B190	Numerous emails and calls with P.Barrett re hearing and settlement discussions	1.20	1,782.00
03/05/2025	T P BROWN	B190	Review dockets on direct action claims vs. former D&Os and related emails with P.Barrett	1.40	2,079.00
03/05/2025	T P BROWN	B190	Conferences with T.Long re hearing strategy	0.30	445.50
03/05/2025	T P BROWN	B190	Prepare for hearings on extension motions and potential status conference on mediation	1.70	2,524.50
03/05/2025	T P BROWN	B190	Conference with J.Rovira re settlement negotiations and outstanding issues	0.40	594.00
03/05/2025	C A RANKIN	B190	Analyze inbound from T. Long regarding further information regarding parties listed on Exhibit B to Committee term sheet and draft response regarding same.	0.40	358.00
03/05/2025	T P BROWN	B190	Review proposed revisions to term sheet and consider related issues and strategy	1.60	2,376.00
03/05/2025	T P BROWN	B190	Emails with mediator and with T.Long re adjournment of hearings	0.10	148.50
03/05/2025	T P BROWN	B190	Emails to debtor reps re adjournment of hearing	0.20	297.00

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03/05/2025	T P BROWN	B190	Telephone call with C.Lascell and P.Barrett re revisions to term sheet	0.40	594.00
03/05/2025	T P BROWN	B190	Telephone call to R.Van Epps re term sheet revisions and email to C.Lascell re same	0.30	445.50
03/05/2025	T P BROWN	B190	Email to J.Rovira re consents to relief requested at hearing and related call with P.Barrett	0.10	148.50
03/05/2025	T P BROWN	B190	Emails with mediator re proposals and call on issues outstanding	0.10	148.50
03/05/2025	T P BROWN	B190	Emails with K.Courington re La. lawsuit and perpetuation depositions and consider issues re same	0.20	297.00
03/05/2025	H P LONG, III	B190	Prepare for hearing on motion for third interim order extending stay	3.40	3,485.00
03/05/2025	H P LONG, III	B190	Analyze issues related to revisions to term sheet and related strategy	1.80	1,845.00
03/06/2025	H P LONG, III	B190	Analyze revisions to term sheet and strategy related to same	0.90	922.50
03/06/2025	H P LONG, III	B190	Analyze and update omnibus reply in support of motion for third interim order extending stay	0.50	512.50
03/06/2025	H P LONG, III	B190	Analyze and update motion for expedited status conference on mediation	0.70	717.50
03/06/2025	H P LONG, III	B190	Analyze and work on exhibit and witness list for hearing on exclusivity motion and motion for third interim order extending stay	0.90	922.50
03/06/2025	H P LONG, III	B190	Analyze and respond to email from counsel to objecting party regarding issues related to hearing on motion for third interim order extending stay and objection to same	1.70	1,742.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/06/2025	H P LONG, III	B190	Prepare for and participate in call with mediator	1.20	1,230.00
03/06/2025	T P BROWN	B190	Emails with T.Long re hearing adjournment and related issues and complaints	0.30	445.50
03/06/2025	T P BROWN	B190	Emails with P.Barrett to coordinate on term sheet and filings	0.20	297.00
03/06/2025	T P BROWN	B190	Emails with C.Lascell, Stout and P.Barrett re term sheet revisions and approvals	0.20	297.00
03/06/2025	T P BROWN	B190	Emails with committee and Hll re sign offs on term sheet	0.20	297.00
03/06/2025	T P BROWN	B190	Emails with committee counsel re sharing term sheet with objecting parties	0.10	148.50
03/06/2025	T P BROWN	B190	Calls with P.Barrett and mediator to prepare for calls to resolve term sheet issues	0.60	891.00
03/06/2025	T P BROWN	B190	Telephone calls with P.Barrett re changes to term sheet and potential revisions strategy and revise same	1.30	1,930.50
03/06/2025	T P BROWN	B190	Prepare for and participate in mediation calls with committee, Hll and debtor counsel	2.40	3,564.00
03/06/2025	T P BROWN	B190	Review stipulated dismissal for D.Ct. appeal and related emails with committee	0.10	148.50
03/06/2025	T P BROWN	B190	Prepare for 3/10/25 hearing and review case law from objectors and Chubb response	3.30	4,900.50
03/06/2025	T P BROWN	B190	Emails with Chubb's counsel re hearing on 3/10	0.10	148.50
03/06/2025	T P BROWN	B190	Emails with P.Barrett re mediation issues	0.30	445.50
03/06/2025	T P BROWN	B190	Conferences with T.Long re hearing and mediation strategy	0.50	742.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/07/2025	T L CANADA	B190	Finalize and electronically file Motion to Expediate Status Conference and Notice regarding same	0.20	82.00
03/07/2025	T L CANADA	B190	Finalize and electronically file Omnibus Rely in Support of Third Interim Stay Order	0.10	41.00
03/07/2025	T P BROWN	B190	Numerous emails with committee counsel re term sheet	0.30	445.50
03/07/2025	T P BROWN	B190	Review and revise pleadings to file for 3/10 hearing	1.70	2,524.50
03/07/2025	T P BROWN	B190	Emails and telephone call with M.Mintz re term sheet and 3/10 hearing	0.40	594.00
03/07/2025	T P BROWN	B190	Emails with Choate re LMIC mediation request and requested call and related call with T.Long	0.20	297.00
03/07/2025	T P BROWN	B190	Telephone call with committee counsel re confirmation of proposed provision re books and records and related emails with committee counsel	0.20	297.00
03/07/2025	T P BROWN	B190	Emails with mediator and with mediation parties re finalizing and filing term sheet	0.30	445.50
03/07/2025	T P BROWN	B190	Conferences with T.Long to finalize filings for term sheet and 3/10 hearing	0.30	445.50
03/07/2025	T P BROWN	B190	Telephone call with T.Long re M.Mintz call and request	0.20	297.00
03/07/2025	T P BROWN	B190	Emails to C.Lascell and R.Van Epps re term sheet progress and discussions with objectors	0.20	297.00
03/07/2025	T P BROWN	B190	Email to Roussel firm and local counsel re term sheet	0.20	297.00
03/07/2025	T P BROWN	B190	Emails with committee counsel re discussions with other creditors re term sheet	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/07/2025	T P BROWN	B190	Prepare for hearings on 3/10 and work on related argument outline	2.40	3,564.00
03/07/2025	T P BROWN	B190	Revise term sheet for signatures and email same to T.Long and T.Canada for filing	0.20	297.00
03/07/2025	J P ROVIRA	B190	Attention to correspondence related to mediation and potential settlement.	0.80	880.00
03/08/2025	T P BROWN	B190	Work on argument outline, review cases and otherwise prepare for hearings on 3/10/25	3.80	5,643.00
03/08/2025	T P BROWN	B190	Emails with committee, Chubb and La. objectors' lawyer and client reps re start time for adjourned 3/10 hearing and related conferences with T.Long	0.30	445.50
03/08/2025	H P LONG, III	B190	Analyze email from counsel regarding adjourning start time of March 10 hearing and strategy (.40), communications with chambers regarding same (.20), and prepare and finalize notice of adjournment (.50)	1.10	1,127.50
03/09/2025	T P BROWN	B190	Review and consider proposal from M.Mintz and review docket for Simoneaux case	0.60	891.00
03/09/2025	T P BROWN	B190	Emails with T.Long re settlement options	0.30	445.50
03/09/2025	T P BROWN	B190	Prepare for hearing on motions to extend exclusivity and stay periods and term sheet presentation	4.80	7,128.00
03/09/2025	T P BROWN	B190	Conference with T.Long re settlement strategy and proposed terms	0.20	297.00
03/09/2025	T P BROWN	B190	Emails with M.Mintz re settlement proposal	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/09/2025	H P LONG, III	B190	Prepare for hearing on motion to extend stay (.70), and prepare draft of email to counsel to objecting party regarding same (.60)	1.30	1,332.50
03/10/2025	T P BROWN	B190	Attend and participate in 3/10 hearing	1.50	2,227.50
03/10/2025	T P BROWN	B190	Emails with J.Rovira and client reps re hearing results	0.20	297.00
03/10/2025	T P BROWN	B190	Emails with Roussel counsel re settlement discussions and proposed call	0.10	148.50
03/10/2025	T P BROWN	B190	Conference with T.Long re Omni hearing dates	0.10	148.50
03/10/2025	T P BROWN	B190	Prepare for hearing on term sheet, exclusivity extensions and extension of stay motions	3.10	4,603.50
03/10/2025	H P LONG, III	B190	Analyze and prepare redline of third interim order incorporating revisions requested from Committee	0.40	410.00
03/10/2025	H P LONG, III	B190	Communications with counsel to Liberty Mutual requesting case update and call related to same	0.40	410.00
03/10/2025	H P LONG, III	B190	Prepare for and participate in March 10 hearing	3.10	3,177.50
03/10/2025	J P ROVIRA	B190	Attention to correspondence related to extension of stay motion.	0.80	880.00
03/10/2025	T P BROWN	B190	Conferences with T.Long re preparation for hearing and re settlement discussions	0.40	594.00
03/11/2025	T P BROWN	B190	Telephone call with Todd Phillips re timeline for plan and consider related issues and settlement negotiations	0.40	594.00
03/11/2025	T P BROWN	B190	Email to T.Phillips re settlement discussions with creditor on stay issues	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/11/2025	T P BROWN	B190	Conference with J.Rovira re appeal strategy, disclosure statement and plan issues and FCR motion	0.50	742.50
03/11/2025	T P BROWN	B190	Telephone call with J.Clement and G.Roussel re appeal and plan issues	0.40	594.00
03/11/2025	T P BROWN	B190	Emails and conferences with T.Long re document production protocols and agreements to same	0.30	445.50
03/11/2025	H P LONG, III	B190	Analyze request from counsel to party in interest for documents in connection with plan, including related provisions of protective orders and compliance with same (.80), and prepare and send response to the same (.60)	1.40	1,435.00
03/11/2025	J P ROVIRA	B190	Attention to correspondence related to proposed schedule for confirmation process.	0.70	770.00
03/12/2025	T P BROWN	B190	Emails with P.Barrett re Roussel call results	0.10	148.50
03/12/2025	T P BROWN	B190	Emails with P.Barrett re dismissal of appeal and related email with J.Rovira	0.10	148.50
03/12/2025	H P LONG, III	B190	Prepare for and participate in call with counsel to Liberty Mutual	0.80	820.00
03/12/2025	H P LONG, III	B190	Analyze and prepare production requested by counsel to party in interest	0.80	820.00
03/13/2025	T L CANADA	B190	Prepare production of documents for Rousell attorneys	0.60	246.00
03/13/2025	T P BROWN	B190	Emails with T.Long and related conference with T.Long re Roussel document requests and authorization	0.20	297.00
03/13/2025	T P BROWN	B190	Emails with J.Clement re authorizations for document protocols	0.10	148.50

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03/13/2025	H P LONG, III	B190	Continue to analyze and prepare production for counsel to party in interest (.80), and communications with counsel to party in interest regarding the same (.40)	1.20	1,230.00
03/14/2025	H P LONG, III	B190	Finalize and send production to counsel for party in interest	0.80	820.00
03/14/2025	T P BROWN	B190	Review email from T.Long re production of requested agreements to Roussel firm	0.10	148.50
03/14/2025	T L CANADA	B190	Finalize production of documents for Rousell attorneys	0.10	41.00
03/17/2025	T P BROWN	B190	Review Chubb email re access to documents produced to committee	0.10	148.50
03/17/2025	H P LONG, III	B190	Analyze demand for documents from counsel to party in interest and issues related to production of same	0.70	717.50
03/18/2025	J P ROVIRA	B190	Review letter from Liberty concerning claim and attention to correspondence related to same.	0.80	880.00
03/18/2025	H P LONG, III	B190	Communications with counsel to Chubb Insurers regarding adjournment of settlement motion (.40), and analyze and finalize notice of the same (.40)	0.80	820.00
03/18/2025	H P LONG, III	B190	Analyze letter from counsel to Liberty regarding its alleged claim and issues related to the same	0.60	615.00
03/18/2025	T P BROWN	B190	Emails with K.Courington re extension of stay and term sheet and defense issues	0.20	297.00
03/18/2025	T P BROWN	B190	Conference with T.Long re adjournment of hearing and Chubb documents request	0.20	297.00
03/18/2025	T P BROWN	B190	Participate in call with Stout on open issues	0.40	594.00

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03/18/2025	T P BROWN	B190	Conference with T.Long re protocol issues and requests for documents	0.30	445.50
03/18/2025	T P BROWN	B190	Emails with committee and J.Rovira re Roussel appeal and related discussions and documents	0.40	594.00
03/18/2025	T P BROWN	B190	Emails with J.Rovira re LMIC position and related calls and emails with LMIC counsel	0.30	445.50
03/18/2025	T P BROWN	B190	Conference with T.Long re Chubb hearing, discovery requests and proposed response re same	0.30	445.50
03/19/2025	T P BROWN	B190	Consider responses to LMIC position on defense obligation and related conference with N.Monico	0.50	742.50
03/19/2025	T P BROWN	B190	Email with N.Monico re LMIC position letter on claim	0.10	148.50
03/20/2025	C A RANKIN	B190	Analyze developments regarding revised plan and supporting documents.	0.20	179.00
03/25/2025	T L CANADA	B190	Analysis of document production tracker chart and ensure all document requests have been resolved.	0.50	205.00
03/25/2025	T L CANADA	B190	Prepare production of all documents produced to the Committee for Chubb with links and encryption key	1.50	615.00
03/25/2025	H P LONG, III	B190	Analyze and respond to email from counsel to Chubb insurers regarding adjournment and deadlines related to Chubb insurers settlement motion	0.90	922.50
03/25/2025	H P LONG, III	B190	Analyze and prepare documents for production in response to document request	1.60	1,640.00
03/25/2025	T P BROWN	B190	Conferences and emails with J.Rovira re Roussel appeal and deadlines	0.30	445.50

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03/25/2025	T P BROWN	B190	Emails and conferences with T.Long re Chubb document requests	0.50	742.50
03/26/2025	T P BROWN	B190	Emails with R.Barrett re Roussel appeal	0.20	297.00
03/26/2025	T P BROWN	B190	Conference with J.Rovira re UST call and re Roussel and committee discussions	0.40	594.00
03/28/2025	T L CANADA	B190	Prepare production of all documents produced to the Committee to Chubb	0.50	205.00
03/31/2025	H P LONG, III	B190	Analyze issues and strategy related to solicitation and confirmation of 524(g) plan	0.80	820.00
03/31/2025	H P LONG, III	B190	Analyze brief filed by Rousell claimants in appeal	0.80	820.00
03/31/2025	H P LONG, III	B190	Analyze and prepare production of documents to counsel to Chubb (2.10) and prepare draft email to counsel to Chubb related to same (.70)	2.80	2,870.00
03/31/2025	T P BROWN	B190	Review Roussel brief on appeal	0.50	742.50
03/31/2025	T P BROWN	B190	Emails with T.Long re Chubb discovery requests	0.20	297.00
03/31/2025	T L CANADA	B190	Finalize production of all documents produced to the Committee to Chubb	1.20	492.00
03/31/2025	C A RANKIN	B190	Analyze Chubb Insurers objection to Committee's fee statement.	0.40	358.00
<b>TOTAL B190</b>				<b>124.50</b>	
03/12/2025	T P BROWN	B210	Emails with C.Lascell and conference with T.Long re cash transfer to maintain sub-account at Citizens Bank	0.10	148.50
03/20/2025	H P LONG, III	B210	Analyze and comment on monthly operating report (.60) and communications with D. Damlijak regarding the same (.20)	0.80	820.00
03/21/2025	T P BROWN	B210	Review draft MOR	0.10	148.50

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03/21/2025	H P LONG, III	B210	Analyze and finalize monthly operating report (.60), and communications with D. Ramlijak and C. Lascell regarding the same (.20)	0.80	820.00
03/21/2025	C A RANKIN	B210	Analyze February MOR.	0.20	179.00
03/27/2025	T P BROWN	B210	Review C.Lascell invoice	0.10	148.50
			<b>TOTAL B210</b>	<b>2.10</b>	
03/10/2025	T P BROWN	B310	Review LMIC claim and consider strategy re same	0.50	742.50
03/10/2025	T P BROWN	B310	Conference with T.Long and consider potential claim objections	0.40	594.00
03/12/2025	N S MONICO	B310	Consider basis for Liberty Mutual claim and potential grounds for objection	0.40	278.00
03/12/2025	T P BROWN	B310	Conference with N.Monico re documents and arguments for claims objection strategy	0.50	742.50
03/12/2025	T P BROWN	B310	Conference with T.Long re objection strategy and related issues	0.40	594.00
03/12/2025	T P BROWN	B310	Telephone call with Choate lawyers re LMIC issues and plan	0.50	742.50
03/13/2025	T P BROWN	B310	Consider strategy on claim objection and related estimation motion	0.30	445.50
03/19/2025	N S MONICO	B310	Analyze Liberty mutual proof of claim (.2); analyze correspondence from liberty mutual counsel regarding its claim (.2)	0.40	278.00
03/20/2025	N S MONICO	B310	Analyze settlement agreements Liberty Mutual alleges support its purported claim	1.20	834.00
03/24/2025	H P LONG, III	B310	Analyze issues and strategy related to filed and scheduled claims and objections to same (1.00), and communications with Verita regarding the same (.40)	1.40	1,435.00

HUNTON ANDREWS KURTH LLP  
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 FILE NUMBER: 040312.0000007

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/25/2025	H P LONG, III	B310	Communications with Verita regarding claims register (.50) and analyze same (1.10)	1.60	1,640.00
03/25/2025	N S MONICO	B310	Prepare objection to Liberty Mutual Claim	3.50	2,432.50
03/25/2025	H P LONG, III	B310	Analyze issues and strategy related to claim filed by insurer and objection to same	0.90	922.50
03/25/2025	H P LONG, III	B310	Analyze issues and strategy related to filed asbestos claims	1.30	1,332.50
03/26/2025	N S MONICO	B310	Prepare objection to claim of Liberty Mutual	2.60	1,807.00
03/26/2025	N S MONICO	B310	Discuss potential revisions to Liberty Mutual claim objection with T.Brown	0.40	278.00
03/28/2025	H P LONG, III	B310	Analyze issues related to objection to filed asbestos claim and analyze and comment on same	3.30	3,382.50
03/28/2025	N S MONICO	B310	Finalize asbestos personal injury claims objection	1.10	764.50
03/28/2025	N S MONICO	B310	Revise Liberty Mutual Claim Objection	2.00	1,390.00
03/31/2025	N S MONICO	B310	Finalize Liberty Mutual claim objection	1.10	764.50
			<b>TOTAL B310</b>	<b>23.80</b>	
03/10/2025	H P LONG, III	B320	Analyze precedent and strategy for plan documents	2.60	2,665.00
03/10/2025	H P LONG, III	B320	Analyze and draft proposed timeline for plan and trust documents and related hearings	0.90	922.50
03/10/2025	T P BROWN	B320	Consider timeline for plan presentation	0.40	594.00
03/11/2025	T P BROWN	B320	Participate in call with Stout and consider plan related issues	0.70	1,039.50
03/11/2025	T P BROWN	B320	Draft and revise proposed plan timeline and emails with J.Rovira re same	0.50	742.50

HUNTON ANDREWS KURTH LLP  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/11/2025	H P LONG, III	B320	Analyze and work on timeline and strategy for plan and trust documents and related hearings on the same	0.70	717.50
03/11/2025	H P LONG, III	B320	Analyze and work on section 524(g) plan of reorganization	2.30	2,357.50
03/12/2025	H P LONG, III	B320	Analyze and work on disclosure statement related to 524(g) plan	3.10	3,177.50
03/12/2025	T P BROWN	B320	Emails with J.Rovira re potential timeline for plan documents and related email to committee counsel	0.20	297.00
03/12/2025	H P LONG, III	B320	Analyze and work on 524(g) plan (2.40) and communications with counsel to Committee regarding the same (.40)	2.80	2,870.00
03/13/2025	T P BROWN	B320	Work on plan and disclosure statement issues	2.20	3,267.00
03/13/2025	T P BROWN	B320	Conferences with T.Long re plan and disclosure statement preparation and related issues and related definitions	0.50	742.50
03/13/2025	H P LONG, III	B320	Continue to analyze and work on section 524(g) plan	3.20	3,280.00
03/13/2025	H P LONG, III	B320	Analyze precedent related to disclosure statement to support 524(g) plan and work on same	3.80	3,895.00
03/14/2025	T P BROWN	B320	Work on disclosure statement inserts on contentions of parties	1.80	2,673.00
03/14/2025	T P BROWN	B320	Email to K.Montgomery re term sheet and proposed exit strategy	0.10	148.50
03/15/2025	T P BROWN	B320	Emails with J.Rovira re plan timeline and committee communications re same	0.10	148.50
03/17/2025	J P ROVIRA	B320	Review and revise proposed chapter 11 plan reflecting settlement with Committee.	2.70	2,970.00

HUNTON ANDREWS KURTH LLP  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/17/2025	H P LONG, III	B320	Analyze and work on 524(g) plan	3.40	3,485.00
03/17/2025	H P LONG, III	B320	Analyze and work on disclosure statement for 524(g) plan	3.90	3,997.50
03/17/2025	T P BROWN	B320	Conference with T.Long re plan and disclosure statement and related issues	0.50	742.50
03/17/2025	T P BROWN	B320	Emails with J.Rovira re plan and disclosure statement drafts	0.20	297.00
03/17/2025	T P BROWN	B320	Work on FCR application, plan and disclosure statement	1.40	2,079.00
03/18/2025	J P ROVIRA	B320	Continue to review and comment on chapter 11 plan incorporating Committee settlement and attention to correspondence related to same.	2.80	3,080.00
03/18/2025	H P LONG, III	B320	Analyze and work on 524(g) plan	1.60	1,640.00
03/18/2025	H P LONG, III	B320	Analyze and work on disclosure statement to support 524(g) plan	2.40	2,460.00
03/18/2025	T P BROWN	B320	Telephone call with K.Courington re term sheet issues	0.20	297.00
03/18/2025	T P BROWN	B320	Review plan and related comments and provide comments and questions	1.20	1,782.00
03/18/2025	T P BROWN	B320	Draft contentions insert to proposed disclosure statement	1.50	2,227.50
03/18/2025	T P BROWN	B320	Conference with T.Long re disclosure statement insert	0.10	148.50
03/19/2025	H P LONG, III	B320	Analyze and work on disclosure statement for 524(g) plan	3.80	3,895.00
03/19/2025	H P LONG, III	B320	Analyze issues and precedent related to solicitation procedures for 524(g) plan and work on motion	2.10	2,152.50

HUNTON ANDREWS KURTH LLP  
 CLIENT NAME: Hopeman Brothers, Inc.  
 FILE NUMBER: 040312.0000007

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/19/2025	T P BROWN	B320	Work on plan and disclosure statement	1.90	2,821.50
03/19/2025	T P BROWN	B320	Emails with R. Van Epps re insurance issues for plan	0.10	148.50
03/19/2025	T P BROWN	B320	Review T.Long email re plan revisions	0.20	297.00
03/19/2025	T P BROWN	B320	Emails and call with K.Courington re plan and term sheet strategy and related issues	0.30	445.50
03/19/2025	T P BROWN	B320	Email with T.Long re strategy on plan and disclosure filing	0.10	148.50
03/19/2025	T P BROWN	B320	Conference call with J.Rovira and T.Long re plan and disclosure statement	0.40	594.00
03/19/2025	H P LONG, III	B320	Analyze and work on 524(g) plan	3.20	3,280.00
03/19/2025	J P ROVIRA	B320	Review revised Plan (1.0); discuss same and additional changes with T. Long (1.0).	1.80	1,980.00
03/20/2025	T P BROWN	B320	Telephone call with committee counsel re FCR, timeline and related plan issues	0.30	445.50
03/20/2025	T P BROWN	B320	Email to J.Rovira re FCR app and plan/disclosure statement issues	0.20	297.00
03/20/2025	T P BROWN	B320	Emails with T.Long re comments on disclosure statement and related issues	0.20	297.00
03/20/2025	T P BROWN	B320	Conferences with T.Long re solicitation motion, plan and disclosure statement	0.50	742.50
03/20/2025	T P BROWN	B320	Work on solicitation motion	1.40	2,079.00
03/20/2025	T P BROWN	B320	Work on plan and disclosure statement	2.40	3,564.00
03/20/2025	H P LONG, III	B320	Analyze and work on solicitation procedures motion for combined hearing on 524(g) plan and disclosure statement	4.80	4,920.00

HUNTON ANDREWS KURTH LLP  
 CLIENT NAME: Hopeman Brothers, Inc.  
 FILE NUMBER: 040312.0000007

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/20/2025	H P LONG, III	B320	Analyze and work on disclosure statement in support of 524(g) plan (1.60) and communications with C. Lascell regarding the same (.20)	1.80	1,845.00
03/20/2025	H P LONG, III	B320	Analyze and work on 524(g) plan (1.10) and communications with C. Lascell regarding the same (.20)	1.30	1,332.50
03/21/2025	T P BROWN	B320	Emails with UST re plan discussion	0.10	148.50
03/21/2025	T P BROWN	B320	Emails with T.Long and C.Lascell re plan documents sent for review to C.Lascell and committee	0.20	297.00
03/21/2025	H P LONG, III	B320	Prepare and send email to counsel to committee with drafts of plan documents (.60), and communications with C. Lascell regarding the same (.30)	0.90	922.50
03/21/2025	H P LONG, III	B320	Analyze and work on disclosure statement in support of 524(g) plan	2.10	2,152.50
03/21/2025	H P LONG, III	B320	Analyze and work on solicitation procedures motion	2.80	2,870.00
03/25/2025	J P ROVIRA	B320	Discuss issues relating to potential plan structure with counsel for Committee (.5); address issues relating to same (.5).	1.00	1,100.00
03/25/2025	T P BROWN	B320	Review revisions to FCR appointment motion from committee counsel	0.30	445.50
03/25/2025	T P BROWN	B320	Emails with K.Montgomery	0.10	148.50
03/26/2025	T P BROWN	B320	Prepare for and participate in call with UST re proposed plan pursuant to term sheet	1.00	1,485.00
03/26/2025	H P LONG, III	B320	Analyze and work on solicitation procedures motion for 524(g) plan	2.60	2,665.00

HUNTON ANDREWS KURTH LLP  
 CLIENT NAME: Hopeman Brothers, Inc.  
 FILE NUMBER: 040312.0000007

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/26/2025	H P LONG, III	B320	Analyze issues related to strategy and deadlines for plan and trust documents related to 524(g) plan	0.90	922.50
03/26/2025	J P ROVIRA	B320	Address issues relating to strategy for dealing with closing Resolute Settlement and impact on Plan and discuss same with T. Brown.	1.00	1,100.00
03/27/2025	H P LONG, III	B320	Analyze and comment on disclosure statement in support of 524(g) plan	1.80	1,845.00
03/27/2025	H P LONG, III	B320	Analyze and comment on solicitation procedures motion and exhibits to the same	3.20	3,280.00
03/28/2025	H P LONG, III	B320	Analyze and comment on proposed draft of trust agreement from Committee	1.80	1,845.00
03/31/2025	H P LONG, III	B320	Analyze and comment on draft trust agreement related to 524(g) plan	1.10	1,127.50
03/31/2025	J P ROVIRA	B320	Review draft trust agreement for Plan from Committee.	1.00	1,100.00
<b>TOTAL B320</b>				<b>96.50</b>	
<b>TOTAL HOURS</b>				<b>292.20</b>	

**TIMEKEEPER SUMMARY:**

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
T P BROWN	Partner	100.10	1,485.00	148,648.50
J W HARBOUR	Partner	0.20	1,430.00	286.00
J P ROVIRA	Partner	18.40	1,100.00	20,240.00
H P LONG, III	Counsel	131.00	1,025.00	134,275.00
N S MONICO	Associate	12.90	695.00	8,965.50
C A RANKIN	Associate	7.60	895.00	6,802.00
T L CANADA	Paralegal	22.00	410.00	9,020.00
<b>TOTAL FEES (\$)</b>				<b>328,237.00</b>

HUNTON ANDREWS KURTH LLP  
CLIENT NAME: Hopeman Brothers, Inc.  
FILE NUMBER: 040312.0000007

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**TIME SUMMARY BY TASK CODE:**

CODE	DESCRIPTION	HOURS	VALUE
B110	Case Administration	18.20	12,683.50
B150	Meetings of and Communications with Creditors	4.70	5,064.50
B160	Fee / Employment Applications	22.30	21,845.50
B170	Fee / Employment Objections	0.10	148.50
B190	Other Contested Matters (excluding assumption / rejection motions)	124.50	155,347.50
B210	Business Operations	2.10	2,264.50
B310	Claims Administration and Objections	23.80	21,400.00
B320	Plan and Disclosure Statement (including Business Plan)	96.50	109,483.00
		<b>292.20</b>	<b>328,237.00</b>

**FOR COSTS ADVANCED AND EXPENSES INCURRED:**

CODE	DESCRIPTION	AMOUNT
E101	Copying	365.00
E106	Online Research	95.00
E116	Trial Transcripts	54.00
E118	Litigation Support Vendors	1,929.30
	<b>TOTAL CURRENT EXPENSES (\$)</b>	<b>2,443.30</b>

**INVOICE SUMMARY:**

Current Fees:	\$ 328,237.00
Current Charges:	2,443.30
<b>CURRENT INVOICE AMOUNT DUE:</b>	<b>\$ 330,680.30</b>

**HUNTON ANDREWS KURTH LLP**

Joseph P. Rovira (admitted *pro hac vice*)  
Catherine A. Rankin (admitted *pro hac vice*)  
600 Travis Street, Suite 4200  
Houston, Texas 77002  
Telephone: (713) 220-4200

**HUNTON ANDREWS KURTH LLP**

Tyler P. Brown (VSB No. 28072)  
Henry P. (Toby) Long, III (VSB No. 75134)  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219  
Telephone: (804) 788-8200

*Counsel for Debtor and Debtor in Possession*

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

**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

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

**NINTH MONTHLY FEE STATEMENT OF  
HUNTON ANDREWS KURTH LLP AS BANKRUPTCY COUNSEL  
FOR THE DEBTOR FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM APRIL 1, 2025 THROUGH AND INCLUDING APRIL 30, 2025**

Name of Applicant:	Hunton Andrews Kurth 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. 163]
Time Period Covered:	April 1, 2025 through April 30, 2025
Total Fees Requested:	\$213,160.00 (80% of \$266,450.00)
Total Expenses Requested:	\$2,338.33
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 Hunton Andrews Kurth LLP (“Hunton”), 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 Hunton for the period from April 1, 2025 through and including April 30, 2025 (the “Fee Period”) and reimbursement of the actual and necessary expenses that Hunton incurred during the Fee Period. By this Monthly Fee Statement, Hunton seeks allowance of compensation for services rendered in the amount of \$266,450.00 and payment in the amount of \$213,160.00 (which equals 80% of the compensation sought herein). Hunton also seeks allowance and reimbursement of actual and necessary expenses in the amount of \$2,338.33.

**Itemization of Services Rendered and Disbursements Incurred**

1. In support of this Monthly Fee Statement, Hunton 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 Hunton professionals and paraprofessionals engaged in the representation of the Debtor during the Fee Period.
  - **Exhibit C** is a summary of the expenses incurred by Hunton during the Fee Period.
  - **Exhibit D** is a detailed invoice for the hours expended and fees incurred by Hunton 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. Hunton 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, Hunton respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$215,498.33, consisting of (i) \$213,160.00, which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Hunton during the Fee Period, and (ii) \$2,338.33 for actual and necessary costs and expenses.

*[Remainder of Page Intentionally Left Blank]*

Dated: May 28, 2025  
Richmond, Virginia

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

Tyler P. Brown (VSB No. 28072)

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

**HUNTON ANDREWS KURTH LLP**

Riverfront Plaza, East Tower

951 East Byrd Street

Richmond, Virginia 23219

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Facsimile: (804) 788-8218

Email: tpbrown@HuntonAK.com

hlong@HuntonAK.com

- and -

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

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

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Houston, TX 77002

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Facsimile: (713) 220-4285

Email: josephrovira@HuntonAK.com

crankin@HuntonAK.com

*Counsel for 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>
B110	Case Administration	3.9	\$2,923.50
B150	Meetings of and Communications with Creditors	0.7	\$763.50
B160	Fee / Employment Applications	27.3	\$22,054.00
B170	Fee / Employment Objections	0.9	\$1,152.50
B190	Other Contested Matters (excluding assumption / rejection motions)	52.3	\$61,855.50
B210	Business Operations	3.8	\$3,910.00
B310	Claims Administration and Objections	32.9	\$37,769.00
B320	Plan and Disclosure Statement (including Business Plan)	121.4	\$136,022.00
<b>Total</b>		<b>243.2</b>	<b>\$266,450.00</b>

**EXHIBIT B**

**Professionals Rendering Services during the Fee Period**

The Hunton attorneys who rendered professional services in these cases during the Fee Period include:

Professional	Position	Year Admitted	Expertise	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. P. Brown	Partner	1987	Bankruptcy	\$1,485	66.3	\$98,455.50
J. W. Harbour	Partner	2001	Bankruptcy	\$1,430	0.2	\$286.00
J. P. Rovira	Partner	2008	Bankruptcy	\$1,100	13.9	\$15,290.00
H. P. Long III	Counsel	2007	Bankruptcy	\$1,025	126.9	\$130,072.50
C. A. Rankin	Associate	2018	Bankruptcy	\$895	12.2	\$10,919.00
N. S. Monico	Associate	2023	Bankruptcy	\$695	6.0	\$4,170.00
<b>Totals</b>					<b>225.5</b>	<b>\$259,193.00</b>

Hunton paraprofessionals who rendered professional services in these cases during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. L. Canada	Paralegal	Bankruptcy	\$410	17.7	\$7,257.00
<b>Totals</b>				<b>17.7</b>	<b>\$7,257.00</b>

**EXHIBIT C**

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

Type	Expenses
Pacer services for the period 01/01/2025 to 03/31/2025	\$109.70
Online Research	\$299.33
Litigation Support Vendors	\$1,929.30
<b>TOTAL EXPENSES:</b>	<b>\$2,338.33</b>

**EXHIBIT D**

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

# HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP  
600 TRAVIS, STE. 4200  
HOUSTON, TX 77002

TEL 713 • 220 • 4200

EIN 54-0572269

## INVOICE SUMMARY-REMITTANCE PAGE

Hopeman Brothers, Inc.  
Attn: Christopher Lascell  
6 Auburn Court  
Brookline, MA 02446-6380

FILE NUMBER: 040312.0000007  
INVOICE NUMBER: 131825298  
DATE: 05/28/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending April 30, 2025 per the attached itemization:

### CURRENT INVOICE SUMMARY:

#### RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring

Current Fees:	\$ 266,450.00
Current Charges:	2,338.33
<b>CURRENT INVOICE AMOUNT DUE:</b>	<b>\$ 268,788.33</b>

TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

FOR BILLING INQUIRIES, PLEASE CALL: 804-788-8555

To Pay By Mail:  
HUNTON ANDREWS KURTH LLP  
PO BOX 405759  
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:  
Bank: Truist Bank, Richmond, VA  
Account Name: Hunton Andrews Kurth LLP Operating  
Account Number: 001458094  
ABA Transit: 061000104  
Swift Code (International): SNTRUS3A  
Information with Wire: File: 040312.0000007, Inv: 131825298, Date: 05/28/2025

# HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP  
600 TRAVIS, STE. 4200  
HOUSTON, TX 77002

TEL 713 • 220 • 4200

EIN 54-0572269

## INVOICE DETAIL

Hopeman Brothers, Inc.  
Attn: Christopher Lascell  
6 Auburn Court  
Brookline, MA 02446-6380

FILE NUMBER: 040312.0000007  
INVOICE NUMBER: 131825298  
DATE: 05/28/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

**RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring**

### FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2025:

DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/04/2025	H P LONG, III	B110	Analyze affidavit of service and communications with Verita regarding the same	0.30	307.50
04/07/2025	T L CANADA	B110	Electronically file certificate of service for doc. nos. 639-643	0.20	82.00
04/08/2025	C A RANKIN	B110	Emails with T. Brown regarding case status and need for Hunton/Stout status conference.	0.10	89.50
04/09/2025	T L CANADA	B110	Electronically file supplemental certificate of service for doc. no. 622	0.10	41.00
04/09/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
04/16/2025	H P LONG, III	B110	Analyze issues and strategy related to hearing dates (.50), and communications with chambers regarding hearing dates (.20)	0.70	717.50
04/18/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00

HUNTON ANDREWS KURTH LLP  
 CLIENT NAME: Hopeman Brothers, Inc.  
 FILE NUMBER: 040312.0000007

INVOICE: 131825298  
 DATE: 05/28/2025  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/21/2025	T L CANADA	B110	Prepare and electronically file Notice of Cancellation of Hearing Scheduled for April 24, 2025, at 10:00 a.m. (Prevailing Eastern Time)	0.50	205.00
04/21/2025	T L CANADA	B110	Electronically file certificate of service for doc nos. 656, 657, 658, 659, 660	0.30	123.00
04/21/2025	T P BROWN	B110	Conference with T.Long re cancelling 4/24 hearing	0.10	148.50
04/21/2025	H P LONG, III	B110	Communications with chambers regarding April 24 omnibus hearing, and analyze and finalize related notice of cancellation	0.50	512.50
04/29/2025	T L CANADA	B110	Finalize and electronically file Notice of Motions and Notice of Hearing and communications with claims agent regarding service of motions	0.40	164.00
04/30/2025	T L CANADA	B110	Prepare and electronically file Notice of Requests for Relief and Notice of Hearing on Motion to File Under Seal	0.30	123.00
			<b>TOTAL B110</b>	<b>3.90</b>	
04/04/2025	H P LONG, III	B150	Analyze and respond to question from Committee counsel regarding sharing documents with party in interest and whether party is subject to confidentiality agreement	0.60	615.00
04/11/2025	T P BROWN	B150	Calls to and from committee counsel	0.10	148.50
			<b>TOTAL B150</b>	<b>0.70</b>	
04/01/2025	T L CANADA	B160	Work on Hunton's Third Interim fee application	2.50	1,025.00
04/07/2025	H P LONG, III	B160	Analyze issues and precedent related to future claims representative application	1.80	1,845.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/09/2025	C A RANKIN	B160	Begin review and revision of Hunton's third interim fee application (.2) and analyze and address open items regarding same (.4).	0.60	537.00
04/09/2025	T L CANADA	B160	Prepare Notice of Third Interim Fee Applications and Notice of Hearing regarding same (.6); and communications with C. Rankin regarding Third Interim fee application	1.10	451.00
04/10/2025	H P LONG, III	B160	Analyze and work on application to appoint future claims representative and analyze precedent related to same	1.40	1,435.00
04/10/2025	C A RANKIN	B160	Review and revise Hunton's Third Interim Fee Application.	1.40	1,253.00
04/11/2025	C A RANKIN	B160	Finalize review of and revisions to Hunton Third Interim Fee Application and circulate same to T. Brown (.7); review and analyze open items regarding Blank Rome Third Interim Fee Application (.4) and communications with K. Brinkman regarding same (.3); review and analyze open items regarding CKSMM Third Interim Fee Application and email T. Rader regarding same (.8); review and analyze Stout's Third Interim Fee Application (.4).	2.60	2,327.00
04/14/2025	T P BROWN	B160	Review Hunton interim application and related emails with C.Rankin	0.50	742.50
04/14/2025	T P BROWN	B160	Review multiple fee statements of committee and Hunton professionals	0.30	445.50

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04/14/2025	C A RANKIN	B160	Analyze and address open items regarding Hunton third interim fee application and timing of filing Debtors' third interim fee application (.8) review and address open items regarding CKSMM third interim fee application (.5); finalize and file Debtors' third interim fee applications (.5).	1.80	1,611.00
04/14/2025	N S MONICO	B160	Prepare Courington fee app (.5); prepare Blank Rome fee app (.5); revise notice of hearing regarding the same (.2)	1.20	834.00
04/14/2025	H P LONG, III	B160	Analyze and work on application for future claimants' representative (.90) and communications with Committee counsel regarding the same (.40)	1.30	1,332.50
04/15/2025	H P LONG, III	B160	Communications with US Trustee regarding LEDES data for fee applications and analyze issues related to same	0.20	205.00
04/16/2025	T L CANADA	B160	Remit LEDES files for Third Interim Fee Application period to UST	0.10	41.00
04/17/2025	T P BROWN	B160	Review committee fee applications	0.10	148.50
04/22/2025	C A RANKIN	B160	Analyze open items regarding Hunton March invoice (1.4) and communications with T. Brown, T. Canada, and M. Stevenson (Hunton Accounting) regarding same (.1).	1.50	1,342.50
04/23/2025	T L CANADA	B160	Work on Hunton's March fee statement	1.70	697.00
04/23/2025	C A RANKIN	B160	Analyze Hunton's monthly fee statement and circulate same to T. Brown (.2) address further open items regarding same (.2).	0.40	358.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/23/2025	T P BROWN	B160	Review and revise proposed monthly fee statements and related email with C.Rankin	0.50	742.50
04/25/2025	T P BROWN	B160	Emails with K.Montgomery re 3rd interim fee application and related compromise	0.10	148.50
04/28/2025	T L CANADA	B160	Finalize, electronically file, and remit for service the 8th monthly fee statements for Hunton, Blank Rome, CKSMM, and Stout (1.8); remit LEDES files to UST for 8th monthly fee period (.2)	2.00	820.00
04/28/2025	C A RANKIN	B160	Communications with T. Canada regarding March monthly fee statements (.2); analyze and address open items regarding CKSMM March monthly fee statement (.6); analyze Stout's March Monthly fee statement (.2); analyze and address open items regarding Blank Rome March Monthly fee statement (.3); analyze Kutak's March monthly fee statement (.3).	1.60	1,432.00
04/28/2025	H P LONG, III	B160	Analyze and work to finalize application for future claimants' representative for filing	0.80	820.00
04/28/2025	T P BROWN	B160	Emails with C.Rankin re monthly fee statement and agreed reduction to interim app	0.10	148.50
04/29/2025	T L CANADA	B160	Finalize and electronically file Joint Motion to Appoint Marla Rosoff Eskin as Future Claimants' Representative and corresponding exhibit	0.70	287.00
04/29/2025	H P LONG, III	B160	Analyze and finalize application to retain future claimants' representative	0.60	615.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/30/2025	H P LONG, III	B160	Analyze issues related to email from Chubb counsel regarding deposition of future claimants' representative and strategy related to same	0.40	410.00
			<b>TOTAL B160</b>	<b>27.30</b>	
04/01/2025	H P LONG, III	B170	Analyze and respond to questions from Committee counsel regarding response to objections to Committee's monthly fee statements	0.40	410.00
04/14/2025	T P BROWN	B170	Review Chubb objection to debtor's fee statements and consider response	0.20	297.00
04/21/2025	T P BROWN	B170	Review Chubb objection to fee statement	0.20	297.00
04/29/2025	T P BROWN	B170	Review additional fee app objections from Chubb	0.10	148.50
			<b>TOTAL B170</b>	<b>0.90</b>	
04/01/2025	T P BROWN	B190	Emails with K.Courington re new La case	0.10	148.50
04/01/2025	H P LONG, III	B190	Analyze email from counsel to Chubb related to term sheet and strategy to address same	0.60	615.00
04/01/2025	H P LONG, III	B190	Analyze and work on production of documents in response to informal discovery requests	1.10	1,127.50
04/02/2025	H P LONG, III	B190	Finalize and prepare production of documents in response to informal discovery requests	1.40	1,435.00
04/02/2025	T P BROWN	B190	Review Chubb email re confidential document preservation	0.10	148.50
04/09/2025	T P BROWN	B190	Emails with K.Courington re Chubb issues and consider same	0.20	297.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/09/2025	H P LONG, III	B190	Analyze strategy related to resolving appeal of Certain Settling Insurers settlement order with Roussel (.90), and communications with P. Barrett regarding the same (.40)	1.30	1,332.50
04/11/2025	T P BROWN	B190	Emails with K.Courington re ongoing cases in which Hopeman is a party	0.10	148.50
04/12/2025	T P BROWN	B190	Email to K.Courington re Roussel discussions	0.10	148.50
04/14/2025	T P BROWN	B190	Telephone call with K.Courington re Roussel appeal and related settlement discussions	0.20	297.00
04/15/2025	T P BROWN	B190	Review notice of hearing from Chubb counsel and related email to T.Long	0.10	148.50
04/15/2025	J P ROVIRA	B190	Discuss issues related to resolving appeal with Roussel firm with T. Brown and address issues related to same.	0.50	550.00
04/15/2025	T P BROWN	B190	Conference with J.Rovira re Roussel settlement discussion and related strategy	0.30	445.50
04/15/2025	T P BROWN	B190	Email with J.Rovira re Roussel discussion for sharing with committee counsel	0.40	594.00
04/15/2025	H P LONG, III	B190	Analyze motion to compel by Chubb Insurers	0.60	615.00
04/16/2025	J P ROVIRA	B190	Continue to address issues related to potential resolution of appeal with Roussel and attention to correspondence related to same.	0.80	880.00
04/16/2025	T P BROWN	B190	Review district court order on appeals	0.10	148.50
04/16/2025	T P BROWN	B190	Review motion to compel 2019 disclosures filed by Chubb and related notice	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/17/2025	J P ROVIRA	B190	Prepare for and participate in call with Committee concerning Roussel appeal and potential resolution of same.	0.80	880.00
04/17/2025	T P BROWN	B190	Prepare for and participate in call with committee professionals re Roussel negotiations	0.50	742.50
04/17/2025	T P BROWN	B190	Emails with K.Courington re Roussel negotiations	0.10	148.50
04/18/2025	J P ROVIRA	B190	Prepare for and participate in call with Roussel concerning appeal and address issues related to same.	1.00	1,100.00
04/18/2025	T P BROWN	B190	Emails with K.Courington re Roussel settlement discussions and telephone call with K.Courington re same	0.20	297.00
04/18/2025	T P BROWN	B190	Conference with J.Rovira re Roussel discussions and re strategy for same	0.20	297.00
04/21/2025	T P BROWN	B190	Prepare for and participate in call with Roussel firm re settlement discussions	0.80	1,188.00
04/21/2025	T P BROWN	B190	Emails with K.Courington re Roussel discussions and related emails with J.Rovira	0.20	297.00
04/21/2025	T P BROWN	B190	Emails and conferences with J.Rovira re Roussel firm negotiations	0.30	445.50
04/22/2025	T P BROWN	B190	Review TRO motion and related pleadings and exhibits filed by Chubb	1.20	1,782.00
04/22/2025	T P BROWN	B190	Conference with J.Rovira re Chubb motion for TRO and related strategy	0.40	594.00
04/22/2025	T P BROWN	B190	Work on response strategy to Chubb complaint and motion	1.30	1,930.50
04/22/2025	T P BROWN	B190	Emails with Chubb's counsel re hearing date for TRO/PI motion and service of pleadings	0.20	297.00

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04/22/2025	H P LONG, III	B190	Analyze complaint and related motion for TRO and preliminary injunction and issues and strategy related to same	2.40	2,460.00
04/22/2025	C A RANKIN	B190	Preliminarily analyze Chubb's adversary complaint and motion for TRO.	1.80	1,611.00
04/22/2025	J W HARBOUR	B190	Analysis of issues concerning TRO motion and communications with counsel	0.20	286.00
04/22/2025	T P BROWN	B190	Emails with K.Courington re insurers and potential relief	0.20	297.00
04/22/2025	T P BROWN	B190	Emails with G.Roussel and K.Courington re settlement discussions	0.20	297.00
04/23/2025	T L CANADA	B190	Analysis of Adversary Proceeding materials and ensure notifications for CM/ECF filings in the matter will be forwarded to T. Long	0.20	82.00
04/23/2025	T P BROWN	B190	Prepare for call with client and Stout re Chubb litigation and consider strategy re same	0.60	891.00
04/23/2025	T P BROWN	B190	Emails with T.Long re hearing and response dates on Chubb PI motion	0.30	445.50
04/23/2025	T P BROWN	B190	Emails with Chubb's counsel re deposition date	0.10	148.50
04/23/2025	T P BROWN	B190	Email from P. Barrett re appellate brief and initial review of brief	0.30	445.50
04/23/2025	T P BROWN	B190	Call with C.Lascell, R.Van Epps, J.Rovira and T.Long re plan and Chubb litigation	0.40	594.00
04/23/2025	T P BROWN	B190	Conferences with J.Rovira re Chubb strategy	0.30	445.50
04/23/2025	T P BROWN	B190	Conference with T.Long re Chubb research, response and strategy for same	0.40	594.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/23/2025	H P LONG, III	B190	Analyze case law related Chubb complaint and motion for preliminary injunction and strategy related to same	3.60	3,690.00
04/24/2025	H P LONG, III	B190	Analyze and work on motion to approve settlement related to Roussel appeal	2.80	2,870.00
04/24/2025	H P LONG, III	B190	Analyze and outline response to Chubb complaint and motion for preliminary injunction	1.90	1,947.50
04/24/2025	T P BROWN	B190	Emails with K.Courington re stay violations and responses	0.20	297.00
04/24/2025	T P BROWN	B190	Emails with T.Long re comments on settlement pleadings	0.10	148.50
04/24/2025	T P BROWN	B190	Review and revise draft settlement motion and stipulated order re Roussel deal	1.00	1,485.00
04/24/2025	T P BROWN	B190	Conduct research re breach and fiduciary out issues	1.70	2,524.50
04/24/2025	T P BROWN	B190	Consider strategy in response to Chubb complaint and PI motion	0.80	1,188.00
04/24/2025	T P BROWN	B190	Conferences with T.Long re research on Chubb preliminary injunction motion	0.30	445.50
04/24/2025	T P BROWN	B190	Conference with T.Long re potential hearing dates on Roussel settlement	0.10	148.50
04/24/2025	T P BROWN	B190	Emails with C.Lascell and R.Van Epps re Roussel settlement	0.10	148.50
04/24/2025	T P BROWN	B190	Telephone call and emails with P.Barrett re appeal settlement and potential consent order	0.30	445.50
04/24/2025	T P BROWN	B190	Work on documenting settlement	0.30	445.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/24/2025	T P BROWN	B190	Conferences with J.Rovira and with T.Long re settlement terms	0.30	445.50
04/24/2025	T P BROWN	B190	Emails with committee re settlement of appeal	0.10	148.50
04/24/2025	T P BROWN	B190	Telephone call with Roussel firm lawyers re settlement of appeal and email confirming settlement	0.50	742.50
04/25/2025	T P BROWN	B190	Conferences with T.Long re Roussel settlement document changes and strategy	0.40	594.00
04/25/2025	T P BROWN	B190	Review notice of hearing	0.10	148.50
04/25/2025	T P BROWN	B190	Email with K.Courington re stay violation	0.10	148.50
04/25/2025	T P BROWN	B190	Review proposed consent motion on Roussel appeal brief	0.20	297.00
04/25/2025	T P BROWN	B190	Emails re ECF notices in adversary proceeding filed by Chubb	0.10	148.50
04/25/2025	T P BROWN	B190	Emails with L.Davis re deposition start time	0.10	148.50
04/25/2025	T P BROWN	B190	Coordinate with T.Long re coordinating with Veritext reporter for deposition of Chubb representative	0.10	148.50
04/25/2025	T P BROWN	B190	Review email from J.Rovira re changes to Roussel settlement pleadings	0.10	148.50
04/25/2025	H P LONG, III	B190	Analyze comments from Roussel firm to motion to approve settlement and related issues	0.90	922.50
04/25/2025	H P LONG, III	B190	Analyze issues related to deposition in connection with Chubb preliminary injunction motion	0.40	410.00
04/25/2025	H P LONG, III	B190	Analyze case law and outline response to Chubb motion for preliminary injunction	2.60	2,665.00

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04/28/2025	T L CANADA	B190	Prepare notice of deposition in the Adversary Proceeding and reserve court reporter for deposition of Edward Sluke	0.70	287.00
04/28/2025	T P BROWN	B190	Emails with P.Barrett re proposed consent motion for extension for appellate brief	0.10	148.50
04/28/2025	T P BROWN	B190	Emails with T.Long re service of proposed notice of deposition	0.20	297.00
04/28/2025	T P BROWN	B190	Conference with T.Canada re notice of deposition	0.10	148.50
04/28/2025	T P BROWN	B190	Work on Chubb-related litigation strategy	0.80	1,188.00
04/28/2025	T P BROWN	B190	Conferences and emails with T.Long re Roussel order changes	0.20	297.00
04/28/2025	H P LONG, III	B190	Analyze and incorporate comments to motion to approve Roussel settlement (.80), and communications with Committee counsel (.60) and Roussel regarding the same (.30)	1.70	1,742.50
04/29/2025	T L CANADA	B190	Electronically file Notice of Deposition of Edward Sluke in the Adversary Proceeding and main bankruptcy case	0.20	82.00
04/29/2025	T L CANADA	B190	Finalize and electronically file Motion to Approve Stipulated Order Approving Settlement of Appeal of Insurance Settlement Order	0.70	287.00
04/29/2025	T P BROWN	B190	Review district court order to allow for settlement of Roussel appeal extension	0.10	148.50
04/29/2025	T P BROWN	B190	Review subpoena to SCS from Chubb and related email to C.Lascell and R.Van Epps	0.40	594.00
04/29/2025	T P BROWN	B190	Review Chubb's motion to compel 2019 disclosures for potential response	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/29/2025	T P BROWN	B190	Conference with J.Rovira re preparation for 5/13 hearing and Chubb points	0.30	445.50
04/29/2025	T P BROWN	B190	Conference with T.Long re filing and service of Chubb deposition notice	0.20	297.00
04/29/2025	T P BROWN	B190	Review emails with Roussel re final changes to settlement order	0.10	148.50
04/29/2025	H P LONG, III	B190	Finalize motion to approve Roussel settlement (.60), and communications with counsel to Committee (.40) and Roussel (.20) regarding the same	1.20	1,230.00
04/30/2025	T L CANADA	B190	Analysis of pleadings and preparation of documents in anticipation of May 13th hearing	0.70	287.00
04/30/2025	T P BROWN	B190	Emails with K.Courington re settlement motion	0.20	297.00
04/30/2025	T P BROWN	B190	Emails with J.Rovira re Chubb email response and respond to Chubb email on settlement motion	0.30	445.50
04/30/2025	T P BROWN	B190	Email with committee counsel re FCR deposition request from Chubb	0.10	148.50
04/30/2025	T P BROWN	B190	Work on outline for Chubb PI motion response	0.90	1,336.50
04/30/2025	H P LONG, III	B190	Analyze issues related to deposition of Chubb witness and strategy and schedule related to same	0.60	615.00
04/30/2025	H P LONG, III	B190	Analyze and comment on response to Chubb counsel regarding Roussel settlement	0.50	512.50
			<b>TOTAL B190</b>	<b>52.30</b>	
04/02/2025	H P LONG, III	B210	Analyze email from US Trustee regarding notice for filing of corporate tax returns, and communications with C. Lascell regarding the same	0.50	512.50

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04/11/2025	T P BROWN	B210	Review emails with C.Lascell re insurance certificate	0.10	148.50
04/11/2025	H P LONG, III	B210	Analyze and respond to email from UST regarding updating insurance information (.50), and communications with C. Lascell regarding the same (.40)	0.90	922.50
04/17/2025	H P LONG, III	B210	Analyze and comment on monthly operating report (.90) and communications with D. Ramlijak regarding the same (.40)	1.30	1,332.50
04/21/2025	H P LONG, III	B210	Analyze and finalize monthly operating report	0.60	615.00
04/21/2025	T P BROWN	B210	Review draft of MOR	0.10	148.50
04/21/2025	T L CANADA	B210	Electronically file March Monthly Operating Report and communications with claims agent regarding service of same	0.20	82.00
04/30/2025	T P BROWN	B210	Review C.Lascell time sheet for March	0.10	148.50
			<b>TOTAL B210</b>	<b>3.80</b>	
04/08/2025	T P BROWN	B310	Work on claim objections	2.30	3,415.50
04/08/2025	H P LONG, III	B310	Analyze issues and strategies related to objections to improperly filed asbestos claims	1.60	1,640.00
04/09/2025	T P BROWN	B310	Work on claim objections	2.70	4,009.50
04/10/2025	N S MONICO	B310	Consider revisions to Liberty Mutual claim objection	0.50	347.50
04/15/2025	H P LONG, III	B310	Analyze and work on objection to Liberty Mutual claim	1.80	1,845.00
04/15/2025	T P BROWN	B310	Work on LMIC claim objection	2.30	3,415.50
04/15/2025	N S MONICO	B310	Call with T.Brown regarding Liberty Mutual claim objection	0.30	208.50
04/16/2025	N S MONICO	B310	Revise Liberty Mutual Claim Objection	1.70	1,181.50

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04/16/2025	N S MONICO	B310	Reasearch claim estimation under 11 U.S.C. 502(c)	0.80	556.00
04/16/2025	T P BROWN	B310	Work on claim objection	0.90	1,336.50
04/16/2025	T P BROWN	B310	Conferences with N.Monico re claim objection revisions and review emails from same	0.40	594.00
04/16/2025	T P BROWN	B310	Review cases located on claim objection issues	0.70	1,039.50
04/16/2025	H P LONG, III	B310	Continue to analyze and work on objection to Liberty Mutual claim	1.40	1,435.00
04/17/2025	T P BROWN	B310	Conference with T.Long re claim objection and related strategy and potential hearing dates	0.30	445.50
04/17/2025	J P ROVIRA	B310	Review and revise objection to Liberty claim and attention to correspondence related to same.	1.30	1,430.00
04/17/2025	T P BROWN	B310	Work on claim objection	1.80	2,673.00
04/22/2025	T P BROWN	B310	Revise objection to claim of LMIC	0.60	891.00
04/29/2025	H P LONG, III	B310	Analyze and work on objection to Liberty claim, including analyzing and working on issues related to sealing same	1.40	1,435.00
04/29/2025	N S MONICO	B310	Prepare motion to seal objection to liberty mutual claim	1.50	1,042.50
04/29/2025	T P BROWN	B310	Review proposed redaction of objection and consider related protocol order	0.40	594.00
04/29/2025	T P BROWN	B310	Review email and comment from committee counsel on claim objection	0.20	297.00
04/30/2025	T L CANADA	B310	Finalize and electronically file Motion to File Under Seal the Objection to Liberty Claim No. 10	0.30	123.00
04/30/2025	T P BROWN	B310	Revise claim objection in response to committee comments	0.70	1,039.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/30/2025	T P BROWN	B310	Conferences with T.Long re redaction of claim objection and revisions	0.20	297.00
04/30/2025	T P BROWN	B310	Revise proposed motion to seal claim objection	0.40	594.00
04/30/2025	H P LONG, III	B310	Analyze, work on and finalize motion to seal objection to Liberty claim	2.80	2,870.00
04/30/2025	H P LONG, III	B310	Analyze and work to finalize objection to Liberty claim, including analyzing comments from Committee on the same and preparing redactions	2.10	2,152.50
04/30/2025	H P LONG, III	B310	Prepare and send email to counsel to Liberty with unredacted version of objection to claim and related filings	0.40	410.00
04/30/2025	T L CANADA	B310	Finalize redaction to Objection to Liberty Claim No. 10 and electronically file redacted version (.8); finalize and electronically file unredacted version under seal (.3).	1.10	451.00
			<b>TOTAL B310</b>	<b>32.90</b>	
04/01/2025	J P ROVIRA	B320	Review draft Plan and related documents and comments received from Committee.	1.50	1,650.00
04/01/2025	H P LONG, III	B320	Prepare summary of comments on Committee's drafts of plan documents and analyze strategy and timing related to same	2.10	2,152.50
04/01/2025	T P BROWN	B320	Emails re Stout call and plan status with J.Rovira and T.Long	0.20	297.00
04/02/2025	J P ROVIRA	B320	Review Trust Agreement and related Plan documents and revise same (1.5); prepare for and participate in call related to same (.7).	2.20	2,420.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/02/2025	H P LONG, III	B320	Analyze and work on disclosure statement to support 524(g) plan to conform to revisions to plan	1.30	1,332.50
04/02/2025	H P LONG, III	B320	Analyze and work on 524(g) plan, including precedent related to same	1.80	1,845.00
04/02/2025	H P LONG, III	B320	Analyze strategy and timing for plan documents related to 524(g) plan	0.70	717.50
04/02/2025	T P BROWN	B320	Conference with T.Long re plan and disclosure statement	0.10	148.50
04/07/2025	H P LONG, III	B320	Analyze and work on solicitation procedures	1.90	1,947.50
04/07/2025	H P LONG, III	B320	Analyze and work on 524(g) plan and related changes to disclosure statement	3.40	3,485.00
04/08/2025	H P LONG, III	B320	Analyze comments from Committee to 524(g) plan	1.80	1,845.00
04/08/2025	T P BROWN	B320	Conference with T.Long re plan, disclosure statement and trust documents	0.30	445.50
04/08/2025	H P LONG, III	B320	Analyze and comment on trust agreement for 524(g) plan	1.40	1,435.00
04/08/2025	H P LONG, III	B320	Analyze issues related to status and strategy for plan and trust documents (1.70), and prepare and send email to Committee counsel related to same (.60)	2.30	2,357.50
04/09/2025	T P BROWN	B320	Emails with J.Rovira and T.Long re plan-related issues	0.20	297.00
04/09/2025	T P BROWN	B320	Work on plan and related timeline issues and strategy for same	2.30	3,415.50
04/09/2025	H P LONG, III	B320	Analyze and make changes to disclosure statement to address Committee comments to plan	2.80	2,870.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/09/2025	H P LONG, III	B320	Analyze issues and strategy related to finalizing and filing plan and trust documents (1.30), and communications with Committee counsel regarding the same (.60)	1.90	1,947.50
04/09/2025	H P LONG, III	B320	Analyze and address comments from Committee to 524(g) plan	1.80	1,845.00
04/09/2025	J P ROVIRA	B320	Review comments to proposed plan and attention to correspondence related to same.	1.00	1,100.00
04/10/2025	T P BROWN	B320	Review email from T.Long to committee re changes to plan drafts and consider same	0.40	594.00
04/10/2025	T P BROWN	B320	Review and revise plan of reorganization and disclosure statement and other plan-related documents	2.40	3,564.00
04/10/2025	T P BROWN	B320	Emails with committee counsel re FCR application and related materials	0.20	297.00
04/10/2025	H P LONG, III	B320	Work on solicitation procedures and analyze precedent related to same	2.80	2,870.00
04/10/2025	H P LONG, III	B320	Communications with Committee counsel regarding plan and trust documents	1.10	1,127.50
04/10/2025	H P LONG, III	B320	Analyze and work on strategy for 524(g) plan	1.80	1,845.00
04/11/2025	T P BROWN	B320	Consider strategy re confirmation issues and potential evidence	1.80	2,673.00
04/11/2025	T P BROWN	B320	Work on plan-related documents	1.70	2,524.50
04/11/2025	T P BROWN	B320	Call from K.Courington re settlement discussions and plan issues	0.20	297.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/11/2025	H P LONG, III	B320	Analyze and work on strategy related to finalizing documents for 524(g) plan and related trust	1.60	1,640.00
04/14/2025	H P LONG, III	B320	Analyze and work on strategy related to finalizing plan and trust documents (1.60), and multiple communications with counsel to Committee regarding the same (.70)	2.30	2,357.50
04/14/2025	T P BROWN	B320	Work on plan-related issues and strategy	2.20	3,267.00
04/14/2025	T P BROWN	B320	Review FCR changes and related conference with T.Long and review email with committee	0.30	445.50
04/15/2025	H P LONG, III	B320	Analyze Committee comments to 524(g) plan	1.60	1,640.00
04/15/2025	H P LONG, III	B320	Analyze comments from Committee to solicitation procedures motion (.70) and work on solicitation procedures motion (1.60)	2.30	2,357.50
04/15/2025	T P BROWN	B320	Conference with T.Long re solicitation motion and other plan-related documents and timing issues	0.40	594.00
04/15/2025	T P BROWN	B320	Review email and comments from committee counsel on solicitation procedures motion	0.50	742.50
04/16/2025	T P BROWN	B320	Review comments on plan and disclosure statement from committee	0.50	742.50
04/16/2025	T P BROWN	B320	Conference with T.Long re solicitation procedures motion and related comments from committee	0.40	594.00
04/16/2025	T P BROWN	B320	Review emails with committee and T.Long re call on plan and trust pleadings	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/16/2025	T P BROWN	B320	Coordinate with T.Long on hearing and timelines for plan solicitation and confirmation process	0.30	445.50
04/16/2025	T P BROWN	B320	Emails with J.Rovira re plan issues	0.20	297.00
04/16/2025	H P LONG, III	B320	Continue to work on solicitation procedures motion	0.70	717.50
04/16/2025	H P LONG, III	B320	Continue to analyze Committee comments to 524(g) plan (.50) and address the same in the plan (1.30)	1.80	1,845.00
04/16/2025	H P LONG, III	B320	Analyze Committee comments to disclosure statement (.60) and address the same in disclosure statement (1.70)	2.30	2,357.50
04/16/2025	H P LONG, III	B320	Analyze issues and strategy to finalize plan and trust documents (.80), and prepare and send email to Committee counsel regarding the same (.60)	1.40	1,435.00
04/17/2025	C A RANKIN	B320	Analyze open items regarding solicitation of confirmation hearing and draft email to T. Long regarding same.	0.40	358.00
04/17/2025	T P BROWN	B320	Emails with T.Long and J.Rovira re proposed plan confirmation call with committee counsel	0.10	148.50
04/17/2025	T P BROWN	B320	Emails with J.Rovira re revisions to claim objection and related strategy	0.10	148.50
04/17/2025	T P BROWN	B320	Review email from P.Barrett re plan discussions	0.10	148.50
04/17/2025	H P LONG, III	B320	Analyze and work on strategy and timing for filing and prosecuting plan and trust documents	1.20	1,230.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/17/2025	H P LONG, III	B320	Multiple communications with Committee counsel regarding plan and trust documents and related issues	0.80	820.00
04/17/2025	H P LONG, III	B320	Work on solicitation procedures motion, including analyzing issues and quotes related to publication	1.70	1,742.50
04/18/2025	H P LONG, III	B320	Analyze recent precedent related to solicitation procedures in 524(g) cases (.90), work on solicitation procedures motion (.80), and communications with Committee counsel regarding the same (.30)	1.90	1,947.50
04/18/2025	T P BROWN	B320	Review emails from committee counsel re solicitation procedures motion and notice issues and conference with T.Long re summary of committee plan discussions	0.30	445.50
04/18/2025	H P LONG, III	B320	Prepare for and participate in call with Committee counsel to discuss strategy for finalizing plan and trust documents	1.40	1,435.00
04/21/2025	T P BROWN	B320	Review and comment on TDP	1.40	2,079.00
04/21/2025	T P BROWN	B320	Emails with T.Long and J.Rovira re TDP	0.10	148.50
04/21/2025	T P BROWN	B320	Review changes to proposed TDP and related email from T.Long and committee counsel	0.30	445.50
04/21/2025	H P LONG, III	B320	Analyze and comment on trust distribution procedures, including confirming provisions were consistent with term sheet and plan documents	2.10	2,152.50
04/22/2025	T P BROWN	B320	Conferences with T.Long re TDP comments and issues to check	0.30	445.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/22/2025	T P BROWN	B320	Conference with T.Long re liquidation analysis and reorg debtor pro forma balance sheet for disclosure statement	0.30	445.50
04/22/2025	T P BROWN	B320	Emails with J.Rovira to coordinate call with client and Stout on plan strategy and Chubb	0.10	148.50
04/22/2025	T P BROWN	B320	Conferences with T.Long re filing plan and related pleadings and forwarding current drafts to clients	0.50	742.50
04/22/2025	T P BROWN	B320	Review emails with committee counsel and P.Barrett re plan-related documents	0.40	594.00
04/22/2025	H P LONG, III	B320	Continue to analyze and comment on trust distribution procedures (1.60), analyze and incorporate comments to trust agreement (1.10), and prepare and send email to Committee counsel with revised versions of trust distribution procedures and trust agreement and discussions about strategy for finalizing same and plan documents (.80)	2.80	2,870.00
04/22/2025	H P LONG, III	B320	Analyze issues related to exhibits to disclosure statement (.60), and communications with Committee counsel regarding the same (.50)	1.10	1,127.50
04/22/2025	H P LONG, III	B320	Prepare and send email to Blank Rome and Stout regarding trust agreement and trust distribution procedures	0.60	615.00
04/22/2025	J P ROVIRA	B320	Attention to correspondence related to Plan and related documents and review revisions to same.	1.00	1,100.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/23/2025	H P LONG, III	B320	Communications with Committee counsel regarding plan exhibits and analyze issues related to same	1.30	1,332.50
04/23/2025	J P ROVIRA	B320	Prepare for and participate in update call with client on status of Plan documents and filings by Chubb (1.2); attention to strategy issues related to Plan and lawsuit filed by Chubb (.8).	2.00	2,200.00
04/23/2025	T P BROWN	B320	Work on disclosure statement and TDP issues	0.70	1,039.50
04/23/2025	H P LONG, III	B320	Prepare for and participate on call with client and Stout to discuss plan documents and recent Chubb filings	1.40	1,435.00
04/24/2025	T P BROWN	B320	Review email from K.Brinkman re proposed change to trust agreement	0.10	148.50
04/24/2025	T P BROWN	B320	Consider strategy re proposed investment for 524(g) plan and revise email to committee re same and conference with T.Long	0.50	742.50
04/24/2025	T P BROWN	B320	Emails with R. Van Epps re TDP issues and comments and consider strategy re same	0.30	445.50
04/24/2025	T P BROWN	B320	Emails from and to committee counsel re liquidation analysis and other plan/disclosure statement issues	0.40	594.00
04/24/2025	H P LONG, III	B320	Analyze restructuring transaction information from Committee (.80), and communications with Stout and C. Lascell regarding the same (.50)	1.30	1,332.50
04/24/2025	H P LONG, III	B320	Communications with Committee counsel regarding restructuring transactions	0.60	615.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/24/2025	J P ROVIRA	B320	Attention to correspondence related to Plan related documents.	0.80	880.00
04/25/2025	T P BROWN	B320	Review emails with R.Van Epps re TDP issues	0.10	148.50
04/25/2025	T P BROWN	B320	Review emails with committee re plan filing logistics and outstanding issues	0.30	445.50
04/25/2025	T P BROWN	B320	Review emails with committee, T.Long and Stout re draft liquidation analysis	0.20	297.00
04/25/2025	H P LONG, III	B320	Analyze liquidation analysis (.80), and communications with Stout and C. Lascell regarding the same (.40)	1.20	1,230.00
04/25/2025	H P LONG, III	B320	Analyze issues and strategy related to finalizing and filing plan and trust documents (1.20), and prepare and send email to Committee counsel regarding the same (.60)	1.80	1,845.00
04/26/2025	T P BROWN	B320	Review numerous emails from and to T.Long re comments on plan from Stout, Blank Rome and committee	0.50	742.50
04/27/2025	T P BROWN	B320	Emails with T.Long re comments on plan-related documents	0.10	148.50
04/27/2025	T P BROWN	B320	Review comments on plan documents from P.Barrett	0.20	297.00
04/27/2025	T P BROWN	B320	Review email from committee counsel re TDP changes	0.10	148.50
04/27/2025	T P BROWN	B320	Review committee comments on plan-related documents	0.30	445.50
04/28/2025	T L CANADA	B320	Prepare Notice of Motions and Notice of Hearing for Solicitation Procedures Motion, Joint Application for FCR Appointment and Motion for Approval of Stipulated Order	0.40	164.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/28/2025	T P BROWN	B320	Conference with T.Long re plan-related documents and revisions	0.30	445.50
04/28/2025	T P BROWN	B320	Review liquidation analysis	0.40	594.00
04/28/2025	T P BROWN	B320	Emails with C.Lascell re plan issues and strategy	0.10	148.50
04/28/2025	T P BROWN	B320	Telephone call with C.Lascell re plan and hearing strategy and re Stout comments on TDP issues	0.60	891.00
04/28/2025	T P BROWN	B320	Conference with T.Long re P.Barrett emails and plan and extension issues	0.10	148.50
04/28/2025	T P BROWN	B320	Review emails and related changes from committee on TDP and other plan-related issues	0.40	594.00
04/28/2025	T P BROWN	B320	Review numerous emails with T.Long and counsel to other parties re final revisions to plan-related documents	0.30	445.50
04/28/2025	H P LONG, III	B320	Analyze issues related to deposition of Chubb witness (.50), and analyze and finalize notice related to same (.40)	0.90	922.50
04/28/2025	H P LONG, III	B320	Analyze and work to finalize plan to prepare for filing (1.40), and multiple communications with Committee counsel regarding the same (.70)	2.10	2,152.50
04/28/2025	H P LONG, III	B320	Analyze and work to finalize disclosure statement to prepare for filing	0.90	922.50
04/28/2025	H P LONG, III	B320	Analyze and work to finalize solicitation procedures motion to prepare for filing	1.60	1,640.00
04/28/2025	H P LONG, III	B320	Multiple communications with Committee counsel regarding trust documents (.50) and analyze comments and remaining steps to finalize same (.70)	1.20	1,230.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/28/2025	J P ROVIRA	B320	Attention to correspondence concerning plan related documents.	1.00	1,100.00
04/29/2025	T L CANADA	B320	Finalize and electronically file Joint Solicitation Motion	1.10	451.00
04/29/2025	T L CANADA	B320	Finalize Plan, Disclosure Statement, and exhibits to same and electronically file Plan and Disclosure Statement	2.20	902.00
04/29/2025	T P BROWN	B320	Final edits to liquidation analysis, plan-related documents	1.80	2,673.00
04/29/2025	T P BROWN	B320	Conferences with T.Long re final revisions and filing logistics	0.40	594.00
04/29/2025	T P BROWN	B320	Emails with C.Lascell, R.Van Epps and J.Rovira re open issues and related call	0.20	297.00
04/29/2025	T P BROWN	B320	Prepare for and participate in call with C.Lascell, R.Van Epps and J.Rovira re plan-related filings	1.20	1,782.00
04/29/2025	T P BROWN	B320	Review pro forma projections from committee for reorg debtor and forward to Stout	0.20	297.00
04/29/2025	T P BROWN	B320	Review numerous emails with committee, T.Long and P.Barrett re final revisions and filing of plan-related documents	0.20	297.00
04/29/2025	H P LONG, III	B320	Analyze and finalize 524(g) plan and related exhibits	1.40	1,435.00
04/29/2025	H P LONG, III	B320	Prepare and send email to Committee counsel regarding remaining steps to finalize and file plan and trust documents	0.60	615.00
04/29/2025	H P LONG, III	B320	Prepare for and participate in call with client and Stout to discuss plan and trust documents	0.80	820.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
04/29/2025	H P LONG, III	B320	Analyze and comment on liquidation analysis (.80), and communications with Committee regarding the same (.30)	1.10	1,127.50
04/29/2025	H P LONG, III	B320	Analyze and finalize solicitation procedures motion	1.10	1,127.50
04/29/2025	H P LONG, III	B320	Analyze and finalize disclosure statement	0.90	922.50
04/29/2025	H P LONG, III	B320	Analyze and comment on reorganized Hopeman projections (.50), and communications with Stout and C. Lascell (.30) and Committee counsel (.40) regarding the same	1.20	1,230.00
04/30/2025	H P LONG, III	B320	Participate in meeting with J. Miller from Verita to prepare for solicitation and analyze related issues	1.20	1,230.00
<b>TOTAL B320</b>				<b>121.40</b>	
<b>TOTAL HOURS</b>				<b>243.20</b>	

**TIMEKEEPER SUMMARY:**

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
T P BROWN	Partner	66.30	1,485.00	98,455.50
J W HARBOUR	Partner	0.20	1,430.00	286.00
J P ROVIRA	Partner	13.90	1,100.00	15,290.00
H P LONG, III	Counsel	126.90	1,025.00	130,072.50
N S MONICO	Associate	6.00	695.00	4,170.00
C A RANKIN	Associate	12.20	895.00	10,919.00
T L CANADA	Paralegal	17.70	410.00	7,257.00
<b>TOTAL FEES (\$)</b>				<b>266,450.00</b>

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**TIME SUMMARY BY TASK CODE:**

CODE	DESCRIPTION	HOURS	VALUE
B110	Case Administration	3.90	2,923.50
B150	Meetings of and Communications with Creditors	0.70	763.50
B160	Fee / Employment Applications	27.30	22,054.00
B170	Fee / Employment Objections	0.90	1,152.50
B190	Other Contested Matters (excluding assumption / rejection motions)	52.30	61,855.50
B210	Business Operations	3.80	3,910.00
B310	Claims Administration and Objections	32.90	37,769.00
B320	Plan and Disclosure Statement (including Business Plan)	121.40	136,022.00
		<b>243.20</b>	<b>266,450.00</b>

**FOR COSTS ADVANCED AND EXPENSES INCURRED:**

CODE	DESCRIPTION	AMOUNT
E106	Online Research	299.33
E118	Litigation Support Vendors	1,929.30
E124	Other - Miscellaneous	109.70
	<b>TOTAL CURRENT EXPENSES (\$)</b>	<b>2,338.33</b>

**INVOICE SUMMARY:**

Current Fees:	\$ 266,450.00
Current Charges:	2,338.33
<b>CURRENT INVOICE AMOUNT DUE:</b>	<b>\$ 268,788.33</b>

**HUNTON ANDREWS KURTH LLP**

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Catherine A. Rankin (admitted *pro hac vice*)  
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**HUNTON ANDREWS KURTH LLP**

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Henry P. (Toby) Long, III (VSB No. 75134)  
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951 East Byrd Street  
Richmond, Virginia 23219  
Telephone: (804) 788-8200

*Counsel for Debtor and Debtor in Possession*

**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  
HUNTON ANDREWS KURTH LLP AS BANKRUPTCY COUNSEL  
FOR THE DEBTOR FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM MAY 1, 2025 THROUGH AND INCLUDING MAY 31, 2025**

Name of Applicant:	Hunton Andrews Kurth 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. 163]
Time Period Covered:	May 1, 2025 through May 31, 2025
Total Fees Requested:	\$436,217.20 (80% of \$545,271.50)
Total Expenses Requested:	\$6,750.91
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 Hunton Andrews Kurth LLP (“Hunton”), 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 Hunton for the period from May 1, 2025 through and including May 31, 2025 (the “Fee Period”) and reimbursement of the actual and necessary expenses that Hunton incurred during the Fee Period. By this Monthly Fee Statement, Hunton seeks allowance of compensation for services rendered in the amount of \$545,271.50 and payment in the amount of \$436,217.20 (which equals 80% of the compensation sought herein). Hunton also seeks allowance and reimbursement of actual and necessary expenses in the amount of \$6,750.91.

**Itemization of Services Rendered and Disbursements Incurred**

1. In support of this Monthly Fee Statement, Hunton 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 Hunton professionals and paraprofessionals engaged in the representation of the Debtor during the Fee Period.
  - **Exhibit C** is a summary of the expenses incurred by Hunton during the Fee Period.
  - **Exhibit D** is a detailed invoice for the hours expended and fees incurred by Hunton 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. Hunton 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, Hunton respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$442,968.11, consisting of (i) \$436,217.20, which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Hunton during the Fee Period, and (ii) \$6,750.91 for actual and necessary costs and expenses.

*[Remainder of Page Intentionally Left Blank]*

Dated: July 15, 2025  
Richmond, Virginia

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

Tyler P. Brown (VSB No. 28072)

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

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hlong@HuntonAK.com

- and -

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

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

**HUNTON ANDREWS KURTH LLP**

600 Travis Street, Suite 4200

Houston, TX 77002

Telephone: (713) 220-4200

Facsimile: (713) 220-4285

Email: josephrovira@HuntonAK.com

crankin@HuntonAK.com

*Counsel for 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>
B110	Case Administration	29.7	\$18,246.00
B160	Fee / Employment Applications	16.5	\$13,296.00
B170	Fee / Employment Objections	14.9	\$16,698.00
B190	Other Contested Matters (excluding assumption / rejection motions)	327.7	\$367,924.50
B210	Business Operations	1.5	\$1,522.00
B310	Claims Administration and Objections	28.1	\$25,697.50
B320	Plan and Disclosure Statement (including Business Plan)	84.8	\$101,887.50
<b>Total</b>		<b>503.2</b>	<b>\$545,271.50</b>

**EXHIBIT B**

**Professionals Rendering Services during the Fee Period**

The Hunton attorneys who rendered professional services in these cases during the Fee Period include:

Professional	Position	Year Admitted	Expertise	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. P. Brown	Partner	1987	Bankruptcy	\$1,485	163.1	\$242,203.50
J. W. Harbour	Partner	2001	Bankruptcy	\$1,430	0.9	\$1,287.00
J. P. Rovira	Partner	2008	Bankruptcy	\$1,100	27.8	\$30,580.00
G. B. Fehling	Partner	2011	Insurance Coverage	\$1,200	1.0	\$1,200.00
H. P. Long III	Counsel	2007	Bankruptcy	\$1,025	189.0	\$193,725.00
C. A. Rankin	Associate	2018	Bankruptcy	\$895	22.8	\$20,406.00
N. S. Monico	Associate	2023	Bankruptcy	\$695	47.8	\$33,221.00
K. T. Bailey	Associate	2023	Bankruptcy	\$690	0.6	\$414.00
R. Rubin	Associate	2025	Bankruptcy	\$695	5.8	\$4,031.00
<b>Totals</b>					<b>458.8</b>	<b>\$527,067.50</b>

Hunton paraprofessionals who rendered professional services in these cases during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. L. Canada	Paralegal	Bankruptcy	\$410	44.4	\$18,204.00
<b>Totals</b>				<b>44.4</b>	<b>\$18,204.00</b>

**EXHIBIT C**

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

Type	Expenses
Copying	\$10.70
Online Research	\$3,607.21
Local Travel	\$41.00
Deposition Transcripts	\$630.60
Trial Transcripts	\$560.15
Litigation Support Vendors	\$1,901.25
<b>TOTAL EXPENSES:</b>	<b>\$6,750.91</b>

**EXHIBIT D**

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

# HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP  
600 TRAVIS, STE. 4200  
HOUSTON, TX 77002

TEL 713 • 220 • 4200

EIN 54-0572269

## INVOICE SUMMARY-REMITTANCE PAGE

Hopeman Brothers, Inc.  
Attn: Christopher Lascell  
6 Auburn Court  
Brookline, MA 02446-6380

FILE NUMBER: 040312.0000007  
INVOICE NUMBER: 131826582  
DATE: 06/30/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending May 31, 2025 per the attached itemization:

## CURRENT INVOICE SUMMARY:

### RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring

Current Fees:	\$ 545,271.50
Current Charges:	6,750.91
<b>CURRENT INVOICE AMOUNT DUE:</b>	<b>\$ 552,022.41</b>

TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

FOR BILLING INQUIRIES, PLEASE CALL: 804-788-8555

To Pay By Mail:  
HUNTON ANDREWS KURTH LLP  
PO BOX 405759  
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:  
Bank: Truist Bank, Richmond, VA  
Account Name: Hunton Andrews Kurth LLP Operating  
Account Number: 001458094  
ABA Transit: 061000104  
Swift Code (International): SNTRUS3A  
Information with Wire: File: 040312.0000007, Inv: 131826582, Date: 06/30/2025

# HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP  
600 TRAVIS, STE. 4200  
HOUSTON, TX 77002

TEL 713 • 220 • 4200

EIN 54-0572269

## INVOICE DETAIL

Hopeman Brothers, Inc.  
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FILE NUMBER: 040312.0000007  
INVOICE NUMBER: 131826582  
DATE: 06/30/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

## RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring

### FOR PROFESSIONAL SERVICES RENDERED THROUGH MAY 31, 2025:

DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/02/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
05/05/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
05/05/2025	T L CANADA	B110	Electronically file certificates of service for doc. nos. 679-683, 686-688, 691-692	0.40	164.00
05/06/2025	T L CANADA	B110	Communications with Court reporter regarding transcript of May 6th hearing	0.10	41.00
05/06/2025	T L CANADA	B110	Electronically file certificates of service for doc. nos. 674, 675, 694, 695, 696	0.30	123.00
05/06/2025	T L CANADA	B110	Communications with Court reporter regarding deposition of Edward Sluke scheduled for May 9th and remit deposition participation link to opposing counsel	0.40	164.00
05/06/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/07/2025	T L CANADA	B110	Analysis of transcript of May 6th hearing	0.10	41.00
05/08/2025	H P LONG, III	B110	Analyze and comment on Salzman pro hac motion (.40), and communications with Committee counsel regarding the same (.20)	0.60	615.00
05/08/2025	H P LONG, III	B110	Analyze and comment on agenda for May 13 hearing (.70), and communications with chambers regarding the same (.10)	0.80	820.00
05/08/2025	T L CANADA	B110	Work on Agenda for May 13th hearing	2.50	1,025.00
05/09/2025	T L CANADA	B110	Prepare electronic device permission form in anticipation of May 13th hearing	0.10	41.00
05/09/2025	T L CANADA	B110	Continue work on Proposed Agenda for May 13th hearing and electronically file same	0.90	369.00
05/09/2025	T L CANADA	B110	Finalize and electronically file Motion for PHV of David B. Salzman	0.40	164.00
05/09/2025	T P BROWN	B110	Review and conference with T.Long re proposed agenda revisions for May 13th hearing.	0.10	148.50
05/09/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
05/09/2025	H P LONG, III	B110	Analyze and work on agenda for May 13 hearing (.60) and communications with chambers regarding the same (.10)	0.70	717.50
05/12/2025	H P LONG, III	B110	Communications with US Trustee regarding items scheduled for May 13 hearing	0.40	410.00
05/12/2025	H P LONG, III	B110	Analyze and finalize agenda for May 13 hearing	0.60	615.00
05/12/2025	T L CANADA	B110	Remit order granting PHV Motion of David Salzman	0.10	41.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/12/2025	T L CANADA	B110	Finalize and electronically file Amended Agenda for May 13th hearing	0.20	82.00
05/12/2025	T L CANADA	B110	Prepare hearing materials for May 13th hearing	0.50	205.00
05/12/2025	T L CANADA	B110	Electronically file Witness and Exhibit list to May 13th hearing	0.20	82.00
05/13/2025	T P BROWN	B110	Conferences with T.Long re submission of proposed orders on Roussel motion and FCR application	0.10	148.50
05/13/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
05/14/2025	T L CANADA	B110	Work on Proposed Agenda for May 21st hearing	2.30	943.00
05/14/2025	T L CANADA	B110	Electronically file certificates of service of doc. nos. 715, 722, 725, 726	0.30	123.00
05/15/2025	H P LONG, III	B110	Analyze and comment on agenda for May 21 hearing	0.70	717.50
05/15/2025	T L CANADA	B110	Continue work on Proposed Agenda for May 21st hearing	0.70	287.00
05/15/2025	T L CANADA	B110	Submit order granting Motion to File Under Seal to the Court	0.10	41.00
05/15/2025	T L CANADA	B110	Prepare and electronically file CNO for Motion to File Under Seal	0.40	164.00
05/16/2025	T L CANADA	B110	Communications with clerk regarding May 21st zoom hearing link and revise proposed agenda with same	0.30	123.00
05/16/2025	T L CANADA	B110	Work on hearing materials for May 21st hearing	4.50	1,845.00
05/19/2025	T P BROWN	B110	Conference with T.Long re agenda revisions	0.10	148.50
05/19/2025	T L CANADA	B110	Continue work on proposed agenda for May 21st hearing	1.50	615.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/19/2025	H P LONG, III	B110	Analyze and finalize agenda for May 21 hearing	0.60	615.00
05/19/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
05/20/2025	T L CANADA	B110	Prepare amended proposed agenda for May 21st hearing	1.20	492.00
05/21/2025	T L CANADA	B110	Electronically file certificate of service of doc. nos. 732, 733, 738	0.20	82.00
05/21/2025	T L CANADA	B110	Finalize and electronically file Amended Proposed Agenda for May 21st hearing	0.70	287.00
05/21/2025	T L CANADA	B110	Prepare hearing materials for May 21st hearing	1.40	574.00
05/21/2025	H P LONG, III	B110	Analyze and finalize amended agenda	0.60	615.00
05/22/2025	T L CANADA	B110	Electronically file certificate of service of doc. nos. 742, 743	0.10	41.00
05/22/2025	T P BROWN	B110	Emails with T.Canada re transcript of FCR deposition and related invoice	0.20	297.00
05/22/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
05/23/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
05/23/2025	T L CANADA	B110	Electronically file certificate of service of doc. nos. 749, 751	0.10	41.00
05/27/2025	T L CANADA	B110	Electronically file certificate of service for doc. nos. 758, 759, 760	0.10	41.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/27/2025	N S MONICO	B110	Analyze local rules regarding procedure from withdrawing as counsel (.4); Prepare notice of withdrawal of Courington, Kiefer, Sommers, Marullo & Matherne, L.L.C as special asbestos counsel (.4)	0.80	556.00
05/27/2025	T P BROWN	B110	Conference with T.Long re preparation of notice of hearing and related issues.	0.20	297.00
05/27/2025	T P BROWN	B110	Emails with T.Long re new omnibus hearing dates and options	0.10	148.50
05/27/2025	H P LONG, III	B110	Analyze issues related to omnibus hearing dates and communications with chambers regarding the same	0.50	512.50
05/28/2025	T L CANADA	B110	Work on and electronically file Notice of Additional Omnibus Hearing dates for July thorough September	0.20	82.00
05/28/2025	T P BROWN	B110	Emails with K.Courington re withdrawal from chapter 11 case	0.10	148.50
05/28/2025	H P LONG, III	B110	Analyze and finalize notice of omnibus hearing dates	0.30	307.50
05/29/2025	T P BROWN	B110	Review draft notice of withdrawal and related conferences with T.Long re same	0.30	445.50
			<b>TOTAL B110</b>	<b>29.70</b>	
05/13/2025	H P LONG, III	B160	Analyze and respond to questions from D. Salzman regarding retention applications and local counsel recommendations for FCR	0.60	615.00
05/13/2025	H P LONG, III	B160	Finalize order approving FCR application (.40), and communications with K. Montgomery regarding endorsement to same (.20)	0.60	615.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/15/2025	H P LONG, III	B160	Confirm no objections to Courington fee application and analyze and comment on draft CNO	0.40	410.00
05/15/2025	C A RANKIN	B160	Analyze Stout's April fee statement.	0.20	179.00
05/19/2025	T L CANADA	B160	Prepare and electronically file certificate of no objection for CKSMM's Third Interim Fee Application and remit order granting same to the Court	0.40	164.00
05/19/2025	T L CANADA	B160	Work on Order granting Stout's 3rd Interim fee application	0.20	82.00
05/19/2025	T L CANADA	B160	Work on Order granting Blank Rome's 3rd Interim fee application	0.20	82.00
05/19/2025	T L CANADA	B160	Work on Order granting Hunton's 3rd Interim fee application	0.20	82.00
05/19/2025	C A RANKIN	B160	Analyze Blank Rome's April fee statement and address open items regarding same.	0.30	268.50
05/19/2025	H P LONG, III	B160	Confirm no opposition to Courington fee application (.10), finalize order and send draft to US Trustee for endorsement (.40), and analyze and finalize certificate of no objection related to the same (.20)	0.70	717.50
05/19/2025	H P LONG, III	B160	Analyze and work on reply in support of interim fee applications	1.10	1,127.50
05/21/2025	C A RANKIN	B160	Analyze open items regarding Hunton April invoice.	1.60	1,432.00
05/21/2025	T L CANADA	B160	Finalize and submit orders granting Hunton, Blank Rome, and Stout's 3rd interim fee applications to the Court	0.40	164.00
05/22/2025	T P BROWN	B160	Review new committee monthly fee apps and orders entered on third interim fee apps	0.20	297.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/22/2025	T L CANADA	B160	Work on Hunton's 9th monthly fee statement for April 2025	1.40	574.00
05/22/2025	C A RANKIN	B160	Analyze revised April invoice and emails with Hunton Accounting team and T. Canada regarding same.	0.40	358.00
05/26/2025	T P BROWN	B160	Consider strategy re potential notice of withdrawal and related issues re LA counsel	0.20	297.00
05/28/2025	C A RANKIN	B160	Analyze and revise Hunton April fee statement (.2) and address final edits to same (.2); review CKSMM April fee statement and address open items regarding same (.5); review Kutak April fee statement and address open items regarding same (.3); coordinate with T. Canada regarding filing of Debtors' professionals' fee statements (.2).	1.40	1,253.00
05/28/2025	T P BROWN	B160	Conference with T.Long re withdrawal of appearance of K.Courington and related call with C.Lascell	0.10	148.50
05/28/2025	T P BROWN	B160	Review Hunton April fee statement and related emails with C.Rankin with revisions	0.50	742.50
05/28/2025	T L CANADA	B160	Finalize and electronically file Stout's 9th monthly fee statement	0.70	287.00
05/28/2025	T L CANADA	B160	Finalize and electronically file 9th monthly fee statement of Blank Rome	0.70	287.00
05/28/2025	T L CANADA	B160	Finalize and electronically file Hunton's 9th monthly fee statement	0.80	328.00
05/28/2025	T L CANADA	B160	Finalize and electronically file 9th monthly fee statement of CKSMM	0.70	287.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/29/2025	H P LONG, III	B160	Analyze issues related to potential withdrawal of professional	0.80	820.00
05/29/2025	T P BROWN	B160	Review emails from and to P.Barrett re Kutak fee app and fee statement	0.10	148.50
05/29/2025	C A RANKIN	B160	Analyze revised Kutak April fee statement and email P. Barrett regarding same.	0.10	89.50
05/30/2025	C A RANKIN	B160	Analyze Kutak first interim fee application (.4) and research open items regarding same (.3) and emails with T. Long (.2) and P. Barrett regarding same (.2).	1.10	984.50
05/30/2025	H P LONG, III	B160	Analyze and respond to questions regarding professional's fee application	0.30	307.50
05/30/2025	T P BROWN	B160	Email from C.Rankin re Kutak fee app and related period to consider response	0.10	148.50
			<b>TOTAL B160</b>	<b>16.50</b>	
05/01/2025	H P LONG, III	B170	Analyze and summarize case law to prepare for reply to insurers' opposition to appointment to future claimants' representative	2.10	2,152.50
05/06/2025	H P LONG, III	B170	Analyze and summarize case law to support reply in support of FCR application	1.10	1,127.50
05/07/2025	H P LONG, III	B170	Analyze case law in support of FCR application for reply to insurer's opposition to FCR appointment.	0.90	922.50
05/11/2025	H P LONG, III	B170	Analyze and summarize case law for reply in support to FCR application	3.10	3,177.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/12/2025	T L CANADA	B170	Finalize and electronically file Reply in Support of Joint Application of the Debtor and the Official Committee of Unsecured Creditors for an Order Appointing Marla Rosoff Eskin, Esq. as Future Claimants' Representative	0.30	123.00
05/12/2025	H P LONG, III	B170	Analyze and work on reply in support of future claimants' representative application (1.90), and multiple communications with N. Miller regarding the same (.70)	2.60	2,665.00
05/13/2025	T P BROWN	B170	Work on response to interim fee app objections by Chubb	0.50	742.50
05/14/2025	T P BROWN	B170	Telephone call with P.Barrett re fee app objections and related issues	0.50	742.50
05/17/2025	T P BROWN	B170	Work on response to objections to fee apps	0.30	445.50
05/19/2025	T P BROWN	B170	Work on reply to interim fee app objection	0.60	891.00
05/19/2025	T P BROWN	B170	Conference with T.Long re research for reply on fee application objection	0.30	445.50
05/20/2025	T P BROWN	B170	Work on reply to objection to interim fee applications	1.30	1,930.50
05/20/2025	H P LONG, III	B170	Analyze and finalize omnibus reply in support of interim fee applications	1.30	1,332.50
			<b>TOTAL B170</b>	<b>14.90</b>	
05/01/2025	H P LONG, III	B190	Analyze emails between Chubb and Committee counsel regarding deposition of proposed future claimants' representative, M. Eskin, and strategy related to same	0.60	615.00

HUNTON ANDREWS KURTH LLP  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/01/2025	H P LONG, III	B190	Analyze Chubb's third-party subpoena for SCS and strategy related to same (.90), and communications with C. Lascell regarding the same (.40)	1.30	1,332.50
05/01/2025	T L CANADA	B190	Analysis of TRO Motion in AP case and prepare hearing materials for May 6th hearing regarding same	0.50	205.00
05/01/2025	T P BROWN	B190	Review email from C.Lascell re SCS receipt of subpoena from unauthorized attorney	0.10	148.50
05/01/2025	T P BROWN	B190	Telephone call with Todd Phillips re FCR deposition and TRO motion	0.20	297.00
05/01/2025	T P BROWN	B190	Prepare deposition outline for Chubb SVP re PI hearing	1.30	1,930.50
05/01/2025	T P BROWN	B190	Conference with T.Long re 2019 motion response and docket review for disclosures and appearances of counsel	0.20	297.00
05/01/2025	T P BROWN	B190	Conference with T.Long re SCS subpoena for responsive documents	0.20	297.00
05/01/2025	T P BROWN	B190	Conference with T.Long re FCR deponent and related coordination with committee counsel and related email with committee	0.20	297.00
05/01/2025	T P BROWN	B190	Work on response to PI motion and related issues	2.20	3,267.00
05/01/2025	H P LONG, III	B190	Analyze Chubb's motion for TRO and case law and strategy related to same (1.80), and communications with T. Brown (.70) and N. Miller at Caplin regarding the same (.40)	2.90	2,972.50

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05/02/2025	H P LONG, III	B190	Analyze and work on objection to Chubb's motion for TRO (6.20), and communications with N. Miller at Caplin regarding the same (.50)	6.70	6,867.50
05/02/2025	T P BROWN	B190	Conference with T.Long re opposition to TRO motion	0.40	594.00
05/02/2025	T P BROWN	B190	Consider strategy re TRO and PI motions of Chubb	1.60	2,376.00
05/02/2025	T P BROWN	B190	Telephone call with committee counsel re depositions scheduling and open issues	0.30	445.50
05/02/2025	H P LONG, III	B190	Communications with counsel to Committee and Chubb regarding Eskin deposition	0.50	512.50
05/03/2025	N S MONICO	B190	Research in support of objection to Chubb TRO	1.50	1,042.50
05/03/2025	T P BROWN	B190	Conference with J.Rovira re TRO opposition strategy	0.30	445.50
05/03/2025	T P BROWN	B190	Emails with committee and Chubb re FCR deposition	0.10	148.50
05/03/2025	T P BROWN	B190	Work on opposition to TRO motion	1.30	1,930.50
05/04/2025	N S MONICO	B190	Research in support of objection to Chubb TRO (.2); Research in support of objection to Chubb TRO (1.3); prepare summary of resulting arguments for objection to Chubb TRO (1.2)	2.70	1,876.50
05/04/2025	T P BROWN	B190	Work on opposition to motion for TRO and related issues	1.80	2,673.00
05/04/2025	T P BROWN	B190	Email to T.Long re draft of opposition to TRO motion	0.10	148.50
05/05/2025	N S MONICO	B190	Research in support of answer to Chubb complaint/objection to Chubb TRO	1.30	903.50

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05/05/2025	J P ROVIRA	B190	Review and revise objection to TRO being sought by Chubb Insurers (1.1) and attention to correspondence related to same (.2).	1.30	1,430.00
05/05/2025	T P BROWN	B190	Work on opposition to TRO motion	2.30	3,415.50
05/05/2025	T P BROWN	B190	Prepare for TRO hearing and review related case law	1.40	2,079.00
05/05/2025	T P BROWN	B190	Prepare outline for oral argument on TRO motion	2.20	3,267.00
05/05/2025	T P BROWN	B190	Conferences with T.Long re revisions to opposition to TRO and related strategy	0.30	445.50
05/05/2025	T P BROWN	B190	Emails with J.Rovira re TRO opposition and review related comments and incorporate into memo	0.40	594.00
05/05/2025	T P BROWN	B190	Emails with Roussel firm re deposition of Chubb representative	0.10	148.50
05/05/2025	H P LONG, III	B190	Prepare for hearing on Chubb's TRO motion	1.10	1,127.50
05/05/2025	H P LONG, III	B190	Analyze and work on objection to Chubb's motion for TRO	3.10	3,177.50
05/05/2025	H P LONG, III	B190	Analyze subpoena served by Chubb on SCS (.50), and communications with C. Lascell and R. Van Epps regarding the same (.40)	0.90	922.50
05/05/2025	T P BROWN	B190	Emails with C.Lascell re depositions for PI hearing	0.10	148.50
05/05/2025	T P BROWN	B190	Emails re SCS meeting to discuss response to Chubb's subpoena to SCS with Stout and C.Lascell	0.20	297.00
05/06/2025	N S MONICO	B190	Research whether a counterparty to a rejected executory contract can require a debtor to perform under the same	0.90	625.50

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05/06/2025	N S MONICO	B190	Research whether expenses constitute an administrative expense in support of answer to Chubb Complaint	1.10	764.50
05/06/2025	T L CANADA	B190	Prepare hearing materials for May 6th hearing in the AP case	1.10	451.00
05/06/2025	J P ROVIRA	B190	Prepare for and monitor hearing on TRO (1.3); discuss follow up issues related to same with T. Brown (.5).	1.80	1,980.00
05/06/2025	T P BROWN	B190	Prepare for TRO hearing	2.40	3,564.00
05/06/2025	T P BROWN	B190	Conference with J.Rovira re results of hearing and TRO and PI strategy	0.40	594.00
05/06/2025	T P BROWN	B190	Work on response to Rule 2019 motion and related strategy	0.70	1,039.50
05/06/2025	T P BROWN	B190	Emails with committee and related call with committee counsel re upcoming hearings	0.80	1,188.00
05/06/2025	T P BROWN	B190	Conference with T.Long re Rule 2019 motion and potential objections	0.20	297.00
05/06/2025	T P BROWN	B190	Conference with T.Long re circulating deposition notices and meeting invitations	0.10	148.50
05/06/2025	T P BROWN	B190	Email to N.Miller re Rule 2019 objection deadline	0.10	148.50
05/06/2025	T P BROWN	B190	Attend TRO hearing	1.50	2,227.50
05/06/2025	T P BROWN	B190	Conference with T.Long re open items for depositions and witness prep for PI hearing	0.40	594.00
05/06/2025	H P LONG, III	B190	Prepare for and attend hearing on Chubb's TRO motion	1.80	1,845.00
05/06/2025	H P LONG, III	B190	Analyze issues related deposition of proposed future claimants' representative	0.60	615.00

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05/06/2025	H P LONG, III	B190	Communications with R. Van Epps regarding preparation for May 13 hearing	0.40	410.00
05/06/2025	H P LONG, III	B190	Analyze and summarize case law for opposition to Chubb's preliminary injunction motion	1.30	1,332.50
05/06/2025	H P LONG, III	B190	Communications with counsel to parties in interest regarding Sluke deposition	0.30	307.50
05/06/2025	H P LONG, III	B190	Analyze issues and strategy related to opposition to Chubb's 2019 motion	0.70	717.50
05/06/2025	H P LONG, III	B190	Analyze issues related to claimant's request for relief from stay to pursue insurers	0.60	615.00
05/07/2025	N S MONICO	B190	Consider response to subpoena served on Special Claims Services, Inc.	0.20	139.00
05/07/2025	N S MONICO	B190	Continue researching whether expenses incurred by Chubb in supporting the Chubb Settlement Improvement Motion in the case constitute and administrative expense (1.2); prepare summary of the same (.6)	1.80	1,251.00
05/07/2025	N S MONICO	B190	Research regarding a debtor's alleged breach of an executory contract in support of Answer to Chubb complaint	0.60	417.00
05/07/2025	N S MONICO	B190	Supplemental research regarding answer to Chubb Complaint	1.90	1,320.50

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05/07/2025	J P ROVIRA	B190	Prepare for and participate in deposition of FCR (1.0); prepare for and participate in call concerning subpoena served on SCS (1.5); continue to address issues relating to disputes with Chubb and attention to correspondence related to same (1.0).	3.50	3,850.00
05/07/2025	T P BROWN	B190	Prepare for and participate in deposition by Chubb of Maria Eskin, FCR candidate	1.20	1,782.00
05/07/2025	T P BROWN	B190	Conference with J.Rovira re FCR motion and expected testimony	0.20	297.00
05/07/2025	T P BROWN	B190	Email to committee counsel re FCR motion strategy	0.20	297.00
05/07/2025	T P BROWN	B190	Prepare for hearing on FCR motion and work on related arguments	1.70	2,524.50
05/07/2025	T P BROWN	B190	Emails with R. Van Epps re hearing prep	0.10	148.50
05/07/2025	T P BROWN	B190	Prepare for and participate in call with SCS, C.Lascell, R. Van Epps and K.Courington re responding to subpoena served on SCS	1.30	1,930.50
05/07/2025	T P BROWN	B190	Confirm response date for Chubb complaint and conference with T.Long re response strategy	0.30	445.50
05/07/2025	T P BROWN	B190	Email to Chubb re PI motion and potential plan discussions	0.30	445.50
05/07/2025	T P BROWN	B190	Telephone call with committee counsel re FCR hearing prep and logistics for witness	0.40	594.00
05/07/2025	T P BROWN	B190	Work on response strategy to Chubb subpoena served on SCS	0.60	891.00

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05/07/2025	H P LONG, III	B190	Work on opposition to Chubb's motion for preliminary injunction and analyze case law in support of same	5.40	5,535.00
05/07/2025	H P LONG, III	B190	Communications with R. Van Epps regarding preparation for May 13 hearing	0.60	615.00
05/07/2025	H P LONG, III	B190	Prepare for and participate in call with SCS regarding subpoena served by Chubb strategy to address same	1.70	1,742.50
05/07/2025	T P BROWN	B190	Draft witness outlines for 5/13 hearing on FCR and solicitation issues	0.90	1,336.50
05/07/2025	T P BROWN	B190	Draft witness prep outline for Roussel settlement motion	1.40	2,079.00
05/07/2025	T P BROWN	B190	Emails with J.Rovira re motion to quash subpoena and related conference with N.Monico to prepare same	0.30	445.50
05/08/2025	T P BROWN	B190	Telephone call with Leslie Davis re potential objections	0.30	445.50
05/08/2025	T P BROWN	B190	Work on motion to quash and related conferences with N.Monico	0.40	594.00
05/08/2025	T P BROWN	B190	Conference with T.Long re pro hac motion	0.10	148.50
05/08/2025	T P BROWN	B190	Emails with J.Clement re settlement issues	0.10	148.50
05/08/2025	T P BROWN	B190	Work on potential resolution of Chubb objections	1.80	2,673.00
05/08/2025	T P BROWN	B190	Telephone call with R.Van Epps re hearing on 5/13	0.10	148.50
05/08/2025	T P BROWN	B190	Conference with T.Long re cancellation of deposition	0.20	297.00
05/08/2025	T P BROWN	B190	Coordinate cancellation of deposition and additional witness	0.40	594.00
05/08/2025	T P BROWN	B190	Conference with J.Rovira re response to complaint	0.30	445.50

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05/08/2025	T P BROWN	B190	Conference with J.Rovira re witness prep and deposition outline	0.30	445.50
05/08/2025	T P BROWN	B190	Witness prep with C.Lascell	1.50	2,227.50
05/08/2025	T P BROWN	B190	Telephone call with C.Lascell re Chubb development on PI hearing	0.10	148.50
05/08/2025	T P BROWN	B190	Emails with Chubb's counsel re plan discussions and cancellation of PI motion hearing	0.20	297.00
05/08/2025	T P BROWN	B190	Prepare for deposition of Chubb rep and review numerous documents for same	2.00	2,970.00
05/08/2025	T P BROWN	B190	Conference with T.Long re PI motion objection and related arguments and review motion for same	0.40	594.00
05/08/2025	T P BROWN	B190	Review C. Lascell testimony outline revisions and related emails with J.Rovira	0.30	445.50
05/08/2025	T P BROWN	B190	Work on prep outline for C.Lascell testimony	1.30	1,930.50
05/08/2025	N S MONICO	B190	Prepare motion to quash Chubb subpoena on Special Claims Services	2.00	1,390.00
05/08/2025	N S MONICO	B190	Continued research regarding a debtor's alleged breach of an executory contract in support of Answer to Chubb complaint (.3); prepare summary of the same (.6)	0.90	625.50
05/08/2025	N S MONICO	B190	Research regarding filing a motion to quash in E.D. Va.	1.10	764.50
05/08/2025	H P LONG, III	B190	Analyze and work on objection to Chubb's preliminary injunction motion	4.40	4,510.00
05/08/2025	H P LONG, III	B190	Prepare order denying Chubb's TRO motion	0.80	820.00
05/08/2025	H P LONG, III	B190	Analyze outline for Lascell testimony	0.80	820.00

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05/08/2025	H P LONG, III	B190	Analyze issues regarding Chubb's withdrawal of preliminary injunction motion	0.70	717.50
05/08/2025	J P ROVIRA	B190	Review witness outline for C. Lascell for hearing on May 13th on various matters and comment on same (.8); prepare for and participate in call with C. Lascell related to same (1.4).	2.20	2,420.00
05/09/2025	H P LONG, III	B190	Analyze and prepare for May 13 hearing	1.80	1,845.00
05/09/2025	H P LONG, III	B190	Analyze and comment on objection to Chubb's 2019 motion	1.80	1,845.00
05/09/2025	H P LONG, III	B190	Analyze and work on exhibit and witness list for May 13 hearing	0.80	820.00
05/09/2025	H P LONG, III	B190	Analyze issues to try to resolve Chubb Insurers objections to matters scheduled for May 13 hearing and related strategy	1.10	1,127.50
05/09/2025	T P BROWN	B190	Email and call from J.Rovira re revisions to disclosure statement	0.20	297.00
05/09/2025	T P BROWN	B190	Emails with K.Courington and C.Lascell re discovery request	0.10	148.50
05/09/2025	T P BROWN	B190	Prepare for 5/13 hearing on motions	1.60	2,376.00
05/09/2025	T P BROWN	B190	Review UST objection and work on strategy to address those objections	1.40	2,079.00
05/09/2025	T P BROWN	B190	Work on motion to quash subpoena	0.80	1,188.00
05/09/2025	T P BROWN	B190	Emails with Chubb's counsel re Roussel concession and other disclosure statement proposals	0.30	445.50

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05/09/2025	T P BROWN	B190	Telephone call with T.Phillips re settlement discussions	0.30	445.50
05/09/2025	T P BROWN	B190	Telephone calls with G.Roussel and J.Clement of Roussel firm re settlement discussions and Chubb requests	0.50	742.50
05/09/2025	T P BROWN	B190	Review and revise proposed 2019 motion objection from committee	0.90	1,336.50
05/09/2025	T P BROWN	B190	Draft and send proposed proffer to C.Lascell	0.80	1,188.00
05/09/2025	T P BROWN	B190	Conference with N.Monico on motion to quash strategy	0.40	594.00
05/09/2025	T P BROWN	B190	Emails with J.Rovira re motion to quash and complaint response strategy	0.30	445.50
05/09/2025	T P BROWN	B190	Draft email and proposed insertions for Chubb to attempt to resolve potential objections to 5/13 hearing	1.50	2,227.50
05/09/2025	T L CANADA	B190	Work on Witness and Exhibit list for May 13th hearing	0.40	164.00
05/09/2025	N S MONICO	B190	Prepare motion to quash Chubb subpoena on Special Claims Services	3.20	2,224.00
05/09/2025	T L CANADA	B190	Finalize and submit order denying the TRO Motion in the adversary proceeding	0.20	82.00
05/10/2025	T P BROWN	B190	Review D&O motion, order and underlying policy provisions and consider strategy	1.30	1,930.50
05/10/2025	T P BROWN	B190	Prepare for 5/13 hearing	1.80	2,673.00
05/10/2025	T P BROWN	B190	Emails with T.Long re D&O and release issues	0.20	297.00
05/11/2025	T P BROWN	B190	Review objection of Chubb to FCR motion and consider strategy re same	0.80	1,188.00

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05/11/2025	T P BROWN	B190	Emails with T.Long re response to FCR motion and related conference with T.Long	0.50	742.50
05/11/2025	T P BROWN	B190	Prepare for and work on hearing outlines for 5/13 motions	3.70	5,494.50
05/11/2025	T P BROWN	B190	Review email from committee re draft FCR reply and initial review of same	0.50	742.50
05/12/2025	T P BROWN	B190	Prepare for 5/13 hearings, revise related outlines and research	3.40	5,049.00
05/12/2025	T P BROWN	B190	Review draft reply on FCR application and revise same	2.30	3,415.50
05/12/2025	T P BROWN	B190	Conferences with T.Long re reply on FCR app	0.30	445.50
05/12/2025	T P BROWN	B190	Review draft agenda and exhibit/witness list and related conference with T.Long	0.20	297.00
05/12/2025	T P BROWN	B190	Emails with committee counsel re reply on FCR application	0.10	148.50
05/12/2025	T P BROWN	B190	Review LMIC motions to seal pleadings	0.30	445.50
05/12/2025	T P BROWN	B190	Emails with C.Lascell re hearing prep meeting	0.10	148.50
05/12/2025	T P BROWN	B190	Meetings with C.Lascell to prepare for hearing on 5/13	1.30	1,930.50
05/12/2025	T P BROWN	B190	Emails with D.Foley re 5/13 hearings	0.10	148.50
05/12/2025	T P BROWN	B190	Review order denying TRO and withdrawal notice	0.10	148.50
05/12/2025	T P BROWN	B190	Emails with P.Barrett re 5/13 hearings	0.10	148.50
05/12/2025	H P LONG, III	B190	Analyze and finalize exhibit and witness list for May 13 hearing	0.70	717.50
05/12/2025	H P LONG, III	B190	Analyze Liberty's opposition to Roussel settlement	0.60	615.00

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05/12/2025	H P LONG, III	B190	Prepare for May 13 hearing (1.40) and multiple communications with C. Lascell regarding the same (.80)	2.20	2,255.00
05/13/2025	N S MONICO	B190	Research in support of Chubb complaint responsive pleading	0.70	486.50
05/13/2025	T P BROWN	B190	Prepare for hearings on Roussel settlement motion and FCR application	2.30	3,415.50
05/13/2025	C A RANKIN	B190	Attend 5.13 contested hearing regarding motion to appoint FCR among other pleadings.	0.90	805.50
05/13/2025	T P BROWN	B190	Participate in hearings on Roussel settlement motion and FCR application and meetings	1.90	2,821.50
05/13/2025	T P BROWN	B190	Work on motion to quash subpoena served on SCS	1.40	2,079.00
05/13/2025	T P BROWN	B190	Meetings with C.Lascell re hearing prep and next steps after hearing	1.20	1,782.00
05/13/2025	T P BROWN	B190	Work on solicitation procedures issues in response to objections	0.70	1,039.50
05/13/2025	T P BROWN	B190	Review emails from K.Courington re Roussel intentions to add LMIC as insurer for debtor	0.20	297.00
05/13/2025	T P BROWN	B190	Emails with K.Courington re results of hearing on settlement approval	0.10	148.50
05/13/2025	T P BROWN	B190	Emails with UST re sealing courtroom for LMIC issues	0.10	148.50
05/13/2025	H P LONG, III	B190	Analyze and finalize order approving Roussel settlement	0.80	820.00
05/13/2025	H P LONG, III	B190	Analyze and comment on objection to Chubb's 2019 motion (.70), and communications with N. Miller regarding the same (.50)	1.20	1,230.00

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05/13/2025	H P LONG, III	B190	Prepare for and attend May 13 hearing	2.30	2,357.50
05/13/2025	H P LONG, III	B190	Analyze and work on motion to quash Chubb's subpoena on SCS	1.70	1,742.50
05/13/2025	J P ROVIRA	B190	Prepare for and listen to hearing on FCR approval and to approve Roussel Settlement.	2.00	2,200.00
05/14/2025	J P ROVIRA	B190	Prepare for and participate in call with counsel for Chubb concerning upcoming discovery issues and open disputes (1.0); address issues relating to strategy regarding same and discuss same with T. Brown (.8).	1.80	1,980.00
05/14/2025	H P LONG, III	B190	Analyze and finalize motion to quash Chubb's subpoena on SCS (1.90), and communications with SCS regarding the same (.30)	2.20	2,255.00
05/14/2025	H P LONG, III	B190	Analyze and work to finalize opposition to Chubb's 2019 motion (.60) and communications with N. Miller regarding the same (.30)	0.80	820.00
05/14/2025	T L CANADA	B190	Work on Motion to Quash subpoena duces tecum and Notice of Motion and Notice of Hearing regarding same	0.60	246.00
05/14/2025	T P BROWN	B190	Work on strategy for resolving UST issues and related changes to ballots and disclosure statement	2.10	3,118.50
05/14/2025	T P BROWN	B190	Work on motion to quash Chubb subpoena to SCS	1.70	2,524.50
05/14/2025	T P BROWN	B190	Emails and conferences with T.Long re motion to quash and related strategy and emails to client and SCS	0.30	445.50

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05/14/2025	T P BROWN	B190	Email to C.Lascell and R.Van Epps re prospects for Resolute closing and Chubb issues	0.20	297.00
05/14/2025	T P BROWN	B190	Conference with T.Long and review emails with committee counsel re filing objection to 2019 motion	0.20	297.00
05/14/2025	H P LONG, III	B190	Analyze entered order approving settlement of Roussel appeal, and communications with Roussel regarding the same	0.40	410.00
05/14/2025	H P LONG, III	B190	Analyze case law in support of motion to dismiss Chubb complaint	0.80	820.00
05/14/2025	N S MONICO	B190	Continued research in support of Chubb complaint responsive pleading (.5); prepare summary of the same (.8)	1.30	903.50
05/15/2025	T P BROWN	B190	Emails with P.Barrett and review related joint stipulation to dismiss appeal and plan confirmation issues	0.20	297.00
05/15/2025	T P BROWN	B190	Emails to Resolute's counsel re final order and wiring instructions and D.Ct. dismissal of case	0.30	445.50
05/15/2025	T P BROWN	B190	Emails with C.Lascell re wiring instructions and related email to R.Van Epps	0.20	297.00
05/15/2025	T P BROWN	B190	Review docket in case for claimants represented by M.Mintz and D.Ct. orders	0.50	742.50
05/15/2025	T P BROWN	B190	Emails with R. Van Epps re dismissal of Roussel appeal	0.10	148.50
05/15/2025	T P BROWN	B190	Review docket in D.Ct. appeal	0.10	148.50
05/15/2025	H P LONG, III	B190	Analyze stipulation of dismissal for Roussel appeal and communications with K. Bender regarding the same	0.50	512.50

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05/15/2025	H P LONG, III	B190	Analyze and work on motion to dismiss Chubb adversary proceeding	4.60	4,715.00
05/16/2025	T P BROWN	B190	Conferences with T.Long re UST objections and related attempts to resolve issues	0.30	445.50
05/16/2025	H P LONG, III	B190	Analyze and work on motion to dismiss Chubb adversary proceeding	4.30	4,407.50
05/16/2025	H P LONG, III	B190	Analyze document requests from Chubb and strategy to respond to the same	0.90	922.50
05/16/2025	T P BROWN	B190	Review notice of appeal from Chubb insurers to FCR appointment order and consider strategy re appeal	0.40	594.00
05/16/2025	T P BROWN	B190	Review new discovery from Chubb insurers and consider strategy re same	0.40	594.00
05/16/2025	T P BROWN	B190	Revise email with UST to propose resolution to objections and review UST response	0.10	148.50
05/17/2025	T P BROWN	B190	Emails with T.Long re gathering responsive documents to Chubb's new discovery and objections to some requests	0.30	445.50
05/17/2025	T P BROWN	B190	Email to Nick Monico re research on Chubb appeal	0.40	594.00
05/19/2025	H P LONG, III	B190	Analyze and work on strategy to respond to Chubb discovery	1.10	1,127.50
05/19/2025	T P BROWN	B190	Review proposed schedule for discovery relating to plan and consider response	0.20	297.00
05/19/2025	T P BROWN	B190	Review Chubb reply on 2019 motion and consider arguments re same	1.20	1,782.00
05/19/2025	T P BROWN	B190	Review research results and related conference with N.Monico on potential dismissal motion	0.50	742.50

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05/19/2025	N S MONICO	B190	Research regarding appeal of order appointing FCR (1.1); Research interlocutory v. final orders regarding the order appoint FCR (1.3); prepare summary of the same (1.)	3.40	2,363.00
05/20/2025	N S MONICO	B190	Follow up research regarding executory contract	0.50	347.50
05/20/2025	N S MONICO	B190	Research caselaw regarding bankruptcy appeal	1.10	764.50
05/20/2025	T P BROWN	B190	Prepare for hearing on Rule 2019 motion	0.50	742.50
05/20/2025	T P BROWN	B190	Emails with J.Rovira re insurer discussions	0.20	297.00
05/20/2025	T P BROWN	B190	Conference with T.Long re response to Chubb proposed schedule for confirmation briefing and discovery	0.20	297.00
05/20/2025	T P BROWN	B190	Conference with T.Long re replies for 5/21 hearings	0.30	445.50
05/20/2025	J P ROVIRA	B190	Review discovery received from Liberty Mutual and address issues relating to strategy for confirmation of Plan.	1.00	1,100.00
05/20/2025	H P LONG, III	B190	Analyze and work on motion to dismiss Chubb adversary proceeding	0.90	922.50
05/20/2025	H P LONG, III	B190	Prepare for May 21 hearing	1.30	1,332.50
05/21/2025	N S MONICO	B190	Continued research regarding bankruptcy appeal (.4); prepare synopsis and recommendation regarding the same (1.2)	1.60	1,112.00
05/21/2025	C A RANKIN	B190	Attend 5/21 hearing.	1.10	984.50
05/21/2025	T P BROWN	B190	Prepare for hearing on disclosure statement/solicitation motion, fee apps and 2019 motion	3.30	4,900.50

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05/21/2025	T P BROWN	B190	Attend hearings on solicitation motion, third interim fee applications and 2019 motion	2.20	3,267.00
05/21/2025	T P BROWN	B190	Work on motion to dismiss adversary proceeding complaint of Chubb insurers	2.30	3,415.50
05/21/2025	T P BROWN	B190	Telephone call with K.Courington re LA lawsuits versus insurers	0.10	148.50
05/21/2025	T P BROWN	B190	Emails with K.Courington re LA lawsuits and coverage issues	0.20	297.00
05/21/2025	T P BROWN	B190	Emails and conference with N.Monico re research results on issues in FCR appeal	0.40	594.00
05/21/2025	J P ROVIRA	B190	Address issues relating to disputes with Liberty Mutual and Chubb and strategy related to same (.7); discuss same with T. Brown (.8).	1.50	1,650.00
05/21/2025	H P LONG, III	B190	Prepare for and attend May 21 hearing	3.60	3,690.00
05/21/2025	H P LONG, III	B190	Analyze and work on motion to dismiss Chubb adversary proceeding	0.80	820.00
05/22/2025	T L CANADA	B190	Prepare notice of Motion and notice of hearing for Motion to Dismiss AP Complaint (.3) and electronically file Motion to Dismiss and Notice regarding same (.3)	0.60	246.00
05/22/2025	T L CANADA	B190	Multiple communications with T. Long, Cognicion, and J. White regarding emails responsive to the Chubb 2004 request	1.90	779.00
05/22/2025	T P BROWN	B190	Work on motion to dismiss Chubb complaint	1.80	2,673.00
05/22/2025	T P BROWN	B190	Conferences with T.Long re revisions to motion to dismiss and filing	0.40	594.00

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05/22/2025	T P BROWN	B190	Work on responses and objections to Chubb and Liberty discovery	0.80	1,188.00
05/22/2025	T P BROWN	B190	Emails with LMIC counsel re discovery requests and related call scheduling and conference with T.Long re same	0.20	297.00
05/22/2025	T P BROWN	B190	Conference with J.Rovira re discovery requests	0.50	742.50
05/22/2025	T P BROWN	B190	Emails with K.Courington re order on settlement and motion to continue LA case	0.10	148.50
05/22/2025	T P BROWN	B190	Call with Liberty's counsel re discovery requests and potential stipulations of fact	0.60	891.00
05/22/2025	T P BROWN	B190	Emails with R. Van Epps and C.Lascell re avoid dates and hearing prep	0.10	148.50
05/22/2025	T P BROWN	B190	Emails from Chubb's counsel and response re discovery call	0.10	148.50
05/22/2025	T P BROWN	B190	Consider evidence and potential witnesses for confirmation hearing	0.40	594.00
05/22/2025	J P ROVIRA	B190	Review discovery requests from Liberty Mutual and Chubb (.8); discuss same with T. Brown and strategy for responding (1.0); prepare for and discuss discovery requests with Liberty (1.0).	2.80	3,080.00
05/22/2025	H P LONG, III	B190	Analyze and finalize motion to dismiss Chubb adversary proceeding	1.40	1,435.00
05/22/2025	H P LONG, III	B190	Analyze and work on response to Chubb discovery requests (.80), and communications with Stout (.50), C. Lascell (.60) and K. Brinkman (.70) regarding the same	2.60	2,665.00

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05/22/2025	H P LONG, III	B190	Analyze and outline strategy to respond to Liberty discovery requests (.90), and prepare for and participate in call with counsel to Liberty regarding the same (.70)	1.60	1,640.00
05/22/2025	C A RANKIN	B190	Conference with T. Long regarding discovery requests and work streams regarding same (.1); begin analyzing and pulling emails to be reviewed in relation to same (.7).	0.80	716.00
05/23/2025	T L CANADA	B190	Multiple communications with T. Long, Cognicion, and J. White regarding emails responsive to the Chubb 2004 request	1.40	574.00
05/23/2025	T P BROWN	B190	Emails with Chubb's counsel re call on discovery requests	0.10	148.50
05/23/2025	T P BROWN	B190	Prepare for and participate in call with Chubb on discovery requests	0.80	1,188.00
05/23/2025	T P BROWN	B190	Conference with T.Long re confirmation hearing strategy and discovery requests	0.50	742.50
05/23/2025	T P BROWN	B190	Work on potential stipulation of facts	0.40	594.00
05/23/2025	T P BROWN	B190	Emails with K.Courington re motion to continue LA cases and related issues	0.10	148.50
05/23/2025	T P BROWN	B190	Review email from LMIC's counsel re discovery discussion follow-up and consider response	0.20	297.00
05/23/2025	T P BROWN	B190	Review LMIC AP filings and consider potential strategy re same	0.50	742.50
05/23/2025	T P BROWN	B190	Emails to and from K.Courington re relief granted and related order from Roussel settlement	0.20	297.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/23/2025	J P ROVIRA	B190	Prepare for and participate in call with Chubb concerning discovery issues (1.2); address issues relating to strategy regarding same (.8).	2.00	2,200.00
05/23/2025	H P LONG, III	B190	Prepare for and participate in call with counsel to Chubb regarding discovery requests	1.10	1,127.50
05/23/2025	H P LONG, III	B190	Analyze and work on response to Chubb discovery requests (1.00) and communications with Stout (.80) and K. Brinkman regarding the same (.60)	2.40	2,460.00
05/23/2025	H P LONG, III	B190	Analyze adversary proceeding filed by Liberty Mutual (.60), and communications with Committee counsel regarding the same (.30)	0.90	922.50
05/23/2025	H P LONG, III	B190	Analyze email from counsel to Liberty regarding proposal to resolve concerns with discovery	0.40	410.00
05/23/2025	C A RANKIN	B190	Continue to review and gather documents regarding Chubb and Liberty discovery requests.	0.90	805.50
05/24/2025	T P BROWN	B190	Emails with T.Long re LMIC issues and response to emails on same	0.10	148.50
05/24/2025	T P BROWN	B190	Emails with R.Van Epps re avoid dates for potential deposition	0.10	148.50
05/26/2025	T P BROWN	B190	Emails with K.Courington re LMIC complaint issues	0.10	148.50
05/26/2025	H P LONG, III	B190	Analyze and respond to email from D. Ramljak regarding response to Chubb discovery requests	0.60	615.00
05/27/2025	T L CANADA	B190	Multiple communications with T. Long, Cognicion, and DST regarding emails responsive to the Chubb and Liberty 2004 request	1.10	451.00

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05/27/2025	T P BROWN	B190	Emails and call with K.Courington re LMIC adversary proceeding	0.20	297.00
05/27/2025	T P BROWN	B190	Telephone call with C.Lascell re LMIC adversary proceeding	0.20	297.00
05/27/2025	T P BROWN	B190	Conference with T.Long re motion to dismiss or abstain strategy	0.30	445.50
05/27/2025	T P BROWN	B190	Emails with J.Rovira re call with committee and re LMIC complaint	0.20	297.00
05/27/2025	T P BROWN	B190	Conference with T.Long re LMIC discovery objections and response to email	0.20	297.00
05/27/2025	T P BROWN	B190	Emails with committee counsel re call on confirmation hearing and LMIC adversary proceeding	0.10	148.50
05/27/2025	T P BROWN	B190	Prepare for and participate in call with committee on confirmation and LMIC complaint strategy	0.40	594.00
05/27/2025	T P BROWN	B190	Review results of research	0.60	891.00
05/27/2025	J P ROVIRA	B190	Review Motion to Withdraw the Reference filed by Liberty and attention to correspondence related to same (1.0); prepare for and participate in call with Committee related to same (.8).	1.80	1,980.00
05/27/2025	H P LONG, III	B190	Prepare for and participate in call with Committee counsel to discuss Liberty adversary proceeding	0.60	615.00
05/27/2025	H P LONG, III	B190	Work on responding to Chubb discovery requests	0.80	820.00
05/28/2025	T L CANADA	B190	Multiple communications with T. Long, Cognicion, and DST regarding emails responsive to the Chubb and Liberty 2004 request	0.60	246.00
05/28/2025	N S MONICO	B190	Coordinate access to doc review with Cognicion	0.40	278.00

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05/28/2025	T P BROWN	B190	Telephone call with C.Lascell and related emails re Chubb document requests	0.20	297.00
05/28/2025	T P BROWN	B190	Review LMIC counsel email on draft stipulations and responses to discovery and revise stipulations	0.60	891.00
05/28/2025	T P BROWN	B190	Emails with C.Lascell and SCS re current claim files requested by Chubb	0.10	148.50
05/28/2025	T P BROWN	B190	Telephone call with C.Lascell re K.Courington call on pending cases	0.20	297.00
05/28/2025	T P BROWN	B190	Review and revise proposed responses and objections to Chubb discovery requests and related conference with T.Long	0.70	1,039.50
05/28/2025	T P BROWN	B190	Call with SCS re Chubb current claim file requests	0.60	891.00
05/28/2025	T P BROWN	B190	Work on responses to discovery requests and strategy re confirmation evidence and stipulations	1.30	1,930.50
05/28/2025	T P BROWN	B190	Emails with T.Long re stay violation and letters re same	0.10	148.50
05/28/2025	H P LONG, III	B190	Analyze documents potentially responsive to Chubb discovery requests	1.60	1,640.00
05/28/2025	H P LONG, III	B190	Analyze and comment on proposed stipulation of facts from Liberty Mutual	0.70	717.50
05/28/2025	H P LONG, III	B190	Communications with Stout regarding Chubb discovery requests	0.60	615.00
05/28/2025	J P ROVIRA	B190	Review proposed stipulated facts from Liberty and address issues related to same.	0.80	880.00

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05/28/2025	C A RANKIN	B190	Analyze information regarding discovery requests and document review projects for Chubb and Liberty (.4) and communications with T. Long, N. Monico, and Cognicion regarding same (.2).	0.60	537.00
05/29/2025	H P LONG, III	B190	Analyze documents potentially responsive to Chubb's discovery requests	3.70	3,792.50
05/29/2025	H P LONG, III	B190	Analyze and work on responses and objections to Chubb's discovery requests	1.70	1,742.50
05/29/2025	H P LONG, III	B190	Analyze second set of discovery requests served by Liberty	0.50	512.50
05/29/2025	C A RANKIN	B190	Analyze Chubb's document requests and related pleadings in relation to same (1.1); conduct document review regarding Chubb's 524g document request (3.8) and analyze and address open items regarding same (.3).	5.20	4,654.00
05/29/2025	N S MONICO	B190	Document review regarding Chubb production request	3.90	2,710.50
05/29/2025	J P ROVIRA	B190	Review proposed stipulated facts from Liberty and revise same (.8); attention to correspondence related to same (.3); address issues relating to Liberty lawsuit and strategy for responding to same (1.2).	2.30	2,530.00
05/29/2025	T P BROWN	B190	Work on response to LMIC discovery and proposed stipulations of fact	0.70	1,039.50
05/29/2025	T P BROWN	B190	Telephone call with A.Parker of SCS re files of open claims and logistics for review	0.30	445.50

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05/29/2025	T P BROWN	B190	Emails with L.Hebert and coordinate share file site link for review of sample files	0.20	297.00
05/29/2025	T P BROWN	B190	Email with LMIC counsel re stipulations and status on discovery responses	0.10	148.50
05/29/2025	T P BROWN	B190	Emails with J.Rovira and review proposed revisions to stipulations of fact	0.10	148.50
05/29/2025	T P BROWN	B190	Revise stipulations of fact to address all comments	0.50	742.50
05/29/2025	T P BROWN	B190	Conferences with T.Long and related emails re response to Chubb discovery email	0.20	297.00
05/29/2025	T P BROWN	B190	Review proposed responses to Chubb discovery requests and final changes to same	0.40	594.00
05/29/2025	H P LONG, III	B190	Analyze and prepare response to email from counsel to Chubb regarding discovery	0.90	922.50
05/29/2025	H P LONG, III	B190	Analyze emails with counsel to Liberty regarding discovery and work on related issues	0.60	615.00
05/30/2025	T P BROWN	B190	Email from and to K.Brinkman re proposed stipulations of fact	0.10	148.50
05/30/2025	J W HARBOUR	B190	Analysis of issues concerning adversary proceeding and communications with counsel	0.20	286.00
05/30/2025	R RUBIN	B190	Participate in call with C. Rankin regarding document review procedure and process	0.10	69.50
05/30/2025	C A RANKIN	B190	Conduct document review regarding Chubb discovery request (3.7) and analyze and address open items regarding same (1.4).	5.10	4,564.50

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05/30/2025	T P BROWN	B190	Conference with J.Rovira re outstanding discovery and confirmation prep issues	0.50	742.50
05/30/2025	T P BROWN	B190	Email to T.Long re changes to objections and responses on Chubb RFPs	0.20	297.00
05/30/2025	T P BROWN	B190	Conference with T.Long re final comments on Chubb responses and on prep of Liberty objections	0.30	445.50
05/30/2025	T P BROWN	B190	Emails with C.Lascell and R.Van Epps re proposed stipulations of fact	0.30	445.50
05/30/2025	T P BROWN	B190	Revise proposed stipulations of fact	0.80	1,188.00
05/30/2025	T P BROWN	B190	Emails with committee counsel re FTI prep meeting	0.10	148.50
05/30/2025	T P BROWN	B190	Emails with SCS re uploading sample open claim files for review and timing of same	0.20	297.00
05/30/2025	T P BROWN	B190	Email to T.Long re glossary for database and related emails to L.Hebert and C.Lascell	0.20	297.00
05/30/2025	T P BROWN	B190	Emails with C.Lascell re settlement trust account balances and closure	0.20	297.00
05/30/2025	T P BROWN	B190	Review Chubb designations on appeal of FCR approval order and issues list	0.20	297.00
05/30/2025	H P LONG, III	B190	Analyze and work on objections and responses to Liberty's first discovery requests, including both interrogatories and document requests	5.70	5,842.50
05/30/2025	H P LONG, III	B190	Finalize and serve objections and responses to Chubb's first discovery requests	0.90	922.50
05/30/2025	H P LONG, III	B190	Analyze documents potentially responsive to Chubb discovery	2.80	2,870.00

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05/30/2025	J P ROVIRA	B190	Address issues relating to discovery requests and discuss same with T. Brown.	1.00	1,100.00
05/30/2025	N S MONICO	B190	Document review regarding Chubb production request	5.90	4,100.50
05/31/2025	K T BAILEY	B190	Perform document review related to Liberty discovery requests.	0.60	414.00
05/31/2025	N S MONICO	B190	Document review regarding Chubb production request	4.40	3,058.00
05/31/2025	R RUBIN	B190	Review documents for request for production from Liberty Mutual, marking privilege and areas for redaction	5.70	3,961.50
05/31/2025	C A RANKIN	B190	Conduct document review regarding Chubb and Liberty discovery requests.	3.10	2,774.50
05/31/2025	T P BROWN	B190	Review new LMIC discovery requests	0.20	297.00
05/31/2025	T P BROWN	B190	Review emails from C.Lascell and SCS re codes in database and potential other glossary for terms and codes	0.20	297.00
05/31/2025	T P BROWN	B190	Review draft of LMIC objections and responses to discovery requests	0.30	445.50
05/31/2025	H P LONG, III	B190	Analyze documents responsive to Chubb's discovery requests	2.10	2,152.50
05/31/2025	H P LONG, III	B190	Analyze documents related to Liberty's discovery requests	1.70	1,742.50
			<b>TOTAL B190</b>	<b>327.70</b>	
05/20/2025	H P LONG, III	B210	Analyze and comment on monthly operating report (.60), and communications with D. Ramlijak regarding the same (.20)	0.80	820.00
05/21/2025	H P LONG, III	B210	Analyze and finalize monthly operating report, and communications with C. Lascell and Stout regarding the same	0.50	512.50

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05/21/2025	T L CANADA	B210	Electronically file April Monthly Operating Report	0.10	41.00
05/28/2025	T P BROWN	B210	Review C.Lascell timesheet for April and related email	0.10	148.50
			<b>TOTAL B210</b>	<b>1.50</b>	
05/01/2025	H P LONG, III	B310	Analyze request from party in interest to Verita regarding proofs of claim and strategy related to same	0.40	410.00
05/02/2025	T P BROWN	B310	Review TRO motion and related notice	0.80	1,188.00
05/08/2025	H P LONG, III	B310	Analyze and respond to question from opposing counsel regarding objection to Liberty Mutual claim	0.70	717.50
05/08/2025	T P BROWN	B310	Emails with LMIC counsel and related claim objection strategy	0.20	297.00
05/13/2025	H P LONG, III	B310	Communications with C. Lascell regarding claims register and strategy regarding certain claims	0.60	615.00
05/13/2025	H P LONG, III	B310	Analyze and work on strategy for objections to improperly filed asbestos claims	0.80	820.00
05/20/2025	N S MONICO	B310	Prepare notice of objections to asbestos personal injury proofs of claim	0.40	278.00
05/20/2025	N S MONICO	B310	Prepare objections to asbestos personal injury proofs of claim	1.50	1,042.50
05/21/2025	N S MONICO	B310	Revise objections to asbestos personal injury proofs of claim to reflect filing of amended plan/disclosure statement and approval of solicitation procedures	1.10	764.50
05/27/2025	N S MONICO	B310	Prepare objection to Zurich American Insurance Company proof of claim	1.10	764.50

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05/27/2025	T L CANADA	B310	Work on Objections to Claims and Notices of Claim Objections for claims 3, 6, 7, 8, 11, 13, 14, 15, 16, 17, 18	2.30	943.00
05/27/2025	T P BROWN	B310	Review draft objection to asbestos proofs of claim filed in case and related conference with T.Long	0.40	594.00
05/27/2025	H P LONG, III	B310	Analyze and work on form omnibus objection to asbestos claims (.90), and conform for objections to asbestos claims filed by following, including analyzing related claims: M. Keung NG (.50), D. Lomonaco (.40), P. Gullage (.40), V. Cala (.50), A. Arcement (.40), J. Teffeteller (.50), G. Zensen (.60), G. Castelli (.40), J. Kirkland (.50), J. Gallo (.40) and R. Brewer (.60)	6.10	6,252.50
05/27/2025	H P LONG, III	B310	Analyze claims register (.50) and communications with Verita regarding the same (.40)	0.90	922.50
05/27/2025	H P LONG, III	B310	Analyze issues related to claim filed by Zurich and strategy related to same	0.80	820.00
05/28/2025	N S MONICO	B310	Finalize objections to asbestos personal injury claims	0.50	347.50
05/28/2025	T L CANADA	B310	Finalize Notice and Objection to Claims 2, 3, 6, 7, 8, 11, 13, 14, 15, 16, 17, 18 and electronically file same	2.30	943.00
05/28/2025	T P BROWN	B310	Conferences with T.Long re asbestos claim objections and review draft of same	0.20	297.00
05/28/2025	T P BROWN	B310	Review draft Zurich claim objection	0.30	445.50
05/28/2025	H P LONG, III	B310	Analyze and work on objections and responses to Chubb's discovery requests	4.10	4,202.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/28/2025	T P BROWN	B310	Conferences with T.Long re Zurich claim objection and consider related document requests	0.20	297.00
05/28/2025	T P BROWN	B310	Conference with T.Long re committee call on claim objection	0.10	148.50
05/28/2025	T P BROWN	B310	Review email from Zurich withdrawing POC	0.10	148.50
05/28/2025	H P LONG, III	B310	Analyze and finalize objection to Zurich proof of claim (1.60), and communications with counsel to Zurich regarding the same (.20)	1.80	1,845.00
05/30/2025	T P BROWN	B310	Review LMIC sealing motion and related materials on response to claim objection	0.40	594.00
			<b>TOTAL B310</b>	<b>28.10</b>	
05/05/2025	H P LONG, III	B320	Work with Verita to prepare for solicitation of plan and disclosure statement and analyze related issues	1.10	1,127.50
05/06/2025	H P LONG, III	B320	Analyze spreadsheet from Verita regarding plan solicitation (.70), and communications with Verita regarding the same (.20)	0.90	922.50
05/06/2025	T P BROWN	B320	Email and conference with T.Long re new decision related to plan and review opinion	0.40	594.00
05/08/2025	T P BROWN	B320	Conferences with J.Rovira re potential resolution of objections and continuance of solicitation motion	0.50	742.50
05/09/2025	J P ROVIRA	B320	Continue to address issues relating to upcoming hearing on May 13 on FCR appointment and conditional approval of the Disclosure Statement.	1.00	1,100.00
05/09/2025	T P BROWN	B320	Emails with C.Lascell re D&O coverage and release issues	0.20	297.00

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05/09/2025	T P BROWN	B320	Emails with T.Long re suggested disclosure statement revisions to address potential objections	0.20	297.00
05/09/2025	T P BROWN	B320	Email to M.Mintz re potential call on plan concerns	0.10	148.50
05/10/2025	T P BROWN	B320	Emails and call with G.Fehling re D&O issues for release in plan	1.00	1,485.00
05/10/2025	H P LONG, III	B320	Analyze issues and precedent related to UST's objection to solicitation procedures and strategy to resolve same	1.60	1,640.00
05/10/2025	G B FEHLING	B320	Evaluate potential D&O insurance coverage for non-asbestos matters and communications with bankruptcy counsel related to same.	1.00	1,200.00
05/10/2025	T P BROWN	B320	Work on strategy in response to solicitation motion objections and potential revisions	1.30	1,930.50
05/10/2025	T P BROWN	B320	Telephone calls re UST objection and potential release changes	0.60	891.00
05/10/2025	T P BROWN	B320	Telephone calls with T.Phillips re adjournment of solicitation motion hearing and strategy re releases	0.40	594.00
05/11/2025	T P BROWN	B320	Review Chubb's objection to solicitation motion	0.70	1,039.50
05/12/2025	H P LONG, III	B320	Analyze and comment on materials from S. Ewing at Verita to prepare for plan solicitation process	0.90	922.50
05/12/2025	H P LONG, III	B320	Analyze Liberty's opposition to solicitation procedures motion	0.80	820.00
05/12/2025	T P BROWN	B320	Conferences with T.Long re notifying parties of continuation of solicitation procedures motion and related issues	0.30	445.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/12/2025	T P BROWN	B320	Conference with J.Rovira re strategy for plan solicitation and addressing objections	0.80	1,188.00
05/12/2025	T P BROWN	B320	Review LMIC objection to solicitation motion and consider response	0.50	742.50
05/12/2025	T P BROWN	B320	Emails with L.Davis re adjournment of solicitation motion	0.10	148.50
05/13/2025	T P BROWN	B320	Emails with Chubb's counsel re call on confirmation scheduling issues	0.10	148.50
05/13/2025	T P BROWN	B320	Conference with J.Rovira re hearing results and solicitation motion strategy	0.40	594.00
05/14/2025	H P LONG, III	B320	Analyze issues related to sharing information with future claimants' representative (.50) and prepare and send email to counsel to future claimants' representative regarding same and applicable protective orders (.40)	0.90	922.50
05/14/2025	H P LONG, III	B320	Analyze and modify solicitation order and related exhibits to resolve US Trustee's objection	3.40	3,485.00
05/14/2025	T P BROWN	B320	Review revisions to solicitation motion, order and ballots and consider revisions	1.70	2,524.50
05/14/2025	T P BROWN	B320	Work on responding to Chubb arguments re insurance neutrality of plan	0.60	891.00
05/14/2025	T P BROWN	B320	Conferences with J.Rovira re Chubb issues and proposed UST changes to disclosure statement and ballots	0.40	594.00
05/14/2025	T P BROWN	B320	Telephone call to Chubb's counsel re solicitation, confirmation, discovery and related issues	1.10	1,633.50
05/14/2025	T L CANADA	B320	Work on revised order for solicitation procedures	0.80	328.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/15/2025	H P LONG, III	B320	Continue to work on solicitation procedures order and related documents to resolve US Trustee's objection (1.40) and prepare and send email to US Trustee regarding same (.70)	2.10	2,152.50
05/15/2025	H P LONG, III	B320	Analyze email to Committee counsel regarding strategy to resolve US Trustee objection and related issues	0.70	717.50
05/15/2025	T P BROWN	B320	Conferences with T.Long re strategy for confirmation hearing date and deadlines and resolving potential plan objections	0.40	594.00
05/15/2025	T P BROWN	B320	Emails and telephone call with M.Mintz re potential plan objection and consider strategy re same	0.40	594.00
05/15/2025	T P BROWN	B320	Email to committee counsel re proposed revisions to address UST objections to solicitation procedures	0.40	594.00
05/15/2025	J W HARBOUR	B320	Analysis of injunction and release issues related to plan and communications with counsel	0.20	286.00
05/15/2025	T P BROWN	B320	Conferences with T.Long re strategy to resolve UST solicitation objections	0.50	742.50
05/15/2025	T P BROWN	B320	Work on strategies to resolve solicitation procedures objections	0.80	1,188.00
05/16/2025	T L CANADA	B320	Work on Notice of Revised Solicitation Procedures Order	0.40	164.00
05/16/2025	T P BROWN	B320	Work on resolving UST solicitation motion objections	0.70	1,039.50
05/16/2025	T P BROWN	B320	Consider strategy re resolving non-UST objections to solicitation motion	0.50	742.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/16/2025	T P BROWN	B320	Emails with FCR's counsel re insurance overview and protocol order and proposed call	0.20	297.00
05/16/2025	T P BROWN	B320	Conference with T.Long re committee discussion on solicitation issues and court availability issues	0.30	445.50
05/16/2025	H P LONG, III	B320	Continue to analyze and work on solicitation procedures order and related documents to address US Trustee's objection (1.50) and analyze and comment on notice of revised order (.40)	1.90	1,947.50
05/16/2025	H P LONG, III	B320	Analyze and respond to email from W. King regarding proposal to resolve US Trustee's objection (1.20), and call with W. King regarding the same (.40)	1.60	1,640.00
05/17/2025	T P BROWN	B320	Work on response to solicitation objections	0.50	742.50
05/18/2025	T P BROWN	B320	Work on reply for solicitation procedures motion	0.80	1,188.00
05/18/2025	T P BROWN	B320	Review excerpt from committee counsel re reply on solicitation motion	0.40	594.00
05/19/2025	H P LONG, III	B320	Analyze and work on reply in support of solicitation procedures motion	1.70	1,742.50
05/19/2025	H P LONG, III	B320	Analyze email from counsel to Chubb with proposed schedule for confirmation hearing and strategy related to same	0.60	615.00
05/19/2025	H P LONG, III	B320	Analyze emails from counsel to FCR regarding requests for information related to plan and executed signature pages for confidentiality agreement	0.60	615.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/19/2025	H P LONG, III	B320	Analyze and revise solicitation procedures order to address comments and resolve objections (1.80), and communications US Trustee (.40) and Committee counsel (.60) regarding the same	2.80	2,870.00
05/19/2025	J P ROVIRA	B320	Address issues relating to contested hearing on DS approval and attention to correspondence related to same.	1.00	1,100.00
05/19/2025	T P BROWN	B320	Call with FCR and committee counsel re disclosure statement and solicitation materials and follow up emails on disclosure statement	0.70	1,039.50
05/19/2025	T P BROWN	B320	Conference with T.Long re committee discussions on solicitation order changes	0.20	297.00
05/19/2025	T P BROWN	B320	Review comments from committee on solicitation procedures order and voting ballots	0.10	148.50
05/19/2025	T P BROWN	B320	Review changes to proposed revisions to order and ballots to resolve UST objection	0.60	891.00
05/19/2025	T P BROWN	B320	Consider strategy and prepare for hearing on solicitation motion and related objections	2.80	4,158.00
05/19/2025	T P BROWN	B320	Work on reply to disclosure statement objection	1.40	2,079.00
05/19/2025	T P BROWN	B320	Work on proposed revisions to solicitation procedures order and ballots	1.80	2,673.00
05/20/2025	H P LONG, III	B320	Analyze and finalize revised solicitation procedures order, analyze and modify order related to same (.90), and communications with Committee counsel (.40) and US Trustee (.30) regarding the same	1.60	1,640.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/20/2025	H P LONG, III	B320	Analyze and finalize reply in support of solicitation procedures motion (1.20), and communications with Committee counsel regarding the same (.50)	1.70	1,742.50
05/20/2025	H P LONG, III	B320	Analyze discovery requests from Liberty	0.50	512.50
05/20/2025	H P LONG, III	B320	Analyze and respond to email from Chubb counsel regarding proposed confirmation schedule	0.60	615.00
05/20/2025	H P LONG, III	B320	Work with S. Ewing at Verita to prepare for solicitation	0.90	922.50
05/20/2025	H P LONG, III	B320	Analyze and work on revisions to plan (.70) and disclosure statement (1.30) to address changes to solicitation procedures order and issues raised in objections to solicitation, and communications with Committee counsel regarding the same (.60)	2.60	2,665.00
05/20/2025	T P BROWN	B320	Review emails with committee and T.Long re revisions to disclosure statement/plan	0.10	148.50
05/20/2025	T P BROWN	B320	Emails with R.Van Epps re potential hearing dates for confirmation	0.10	148.50
05/20/2025	T P BROWN	B320	Emails with P.Barrett re HII review of disclosure statement and plan changes	0.10	148.50
05/20/2025	T P BROWN	B320	Conferences with T.Long re final disclosure statement and plan changes	0.40	594.00
05/20/2025	T P BROWN	B320	Review and revise disclosure statement, solicitation order and related ballots	1.30	1,930.50
05/20/2025	T P BROWN	B320	Prepare for hearings on disclosure statement and fee applications	2.90	4,306.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/20/2025	T P BROWN	B320	Work on disclosure statement inserts	1.30	1,930.50
05/20/2025	T P BROWN	B320	Emails with UST re resolution of objection	0.10	148.50
05/20/2025	T P BROWN	B320	Work on reply to solicitation objections	1.70	2,524.50
05/20/2025	T L CANADA	B320	Prepare notice of Amended Plan and Disclosure Statement	0.60	246.00
05/20/2025	T L CANADA	B320	Prepare exhibits for Notice of Filing of revised Solicitations Procedures Order	0.80	328.00
05/20/2025	T L CANADA	B320	Work on exhibits to amended plan and disclosure statement	1.10	451.00
05/21/2025	T L CANADA	B320	Finalize and electronically file Amended Chapter 11 Plan and Amended Disclosure Statement	0.50	205.00
05/21/2025	T L CANADA	B320	Finalize and electronically file notice of redlines of Amended Plan and Amended Disclosure Statement	0.40	164.00
05/21/2025	T L CANADA	B320	Finalize and electronically file notice of revised solicitation procedures motion order	0.30	123.00
05/21/2025	T L CANADA	B320	Finalize and submit Solicitation Procedures Motion Order to the Court	0.10	41.00
05/21/2025	T P BROWN	B320	Conferences with T.Long re filing of redlines to plan, disclosure statement and solicitation procedures	0.30	445.50
05/21/2025	T P BROWN	B320	Conference with J.Rovira following hearing on arguments, rulings and next steps	0.40	594.00
05/21/2025	T P BROWN	B320	Email to R. Van Epps and C.Lascell re July 1 hearing date and related prep	0.20	297.00
05/21/2025	T P BROWN	B320	Consider strategy re structuring of reorganized debtor and related issues	0.40	594.00

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05/21/2025	T P BROWN	B320	Emails with T.Long re publication notice issues and timing	0.20	297.00
05/21/2025	H P LONG, III	B320	Analyze and finalize revised version of plan	0.70	717.50
05/21/2025	H P LONG, III	B320	Analyze and finalize revised version of disclosure statement	1.20	1,230.00
05/21/2025	H P LONG, III	B320	Analyze and finalize revised version of solicitation procedures order in advance of hearing	0.90	922.50
05/21/2025	H P LONG, III	B320	Modify and finalize solicitation procedures order to address Judge's ruling (.60), and communications with counsel to Committee (.30), US Trustee (.20), and chambers (.20) regarding the same	1.30	1,332.50
05/21/2025	H P LONG, III	B320	Analyze entered solicitation procedures order (.30), and communications with Verita regarding same and proceeding with solicitation (.80)	1.10	1,127.50
05/22/2025	J W HARBOUR	B320	Analysis of potential disputed confirmation issues and communications with counsel	0.50	715.00
05/22/2025	T P BROWN	B320	Conference with J.Rovira re Liberty call results and confirmation hearing strategy	0.30	445.50
05/22/2025	T P BROWN	B320	Conference with J.Harbour re structuring issues for reorganized debtor and plan	0.50	742.50
05/22/2025	H P LONG, III	B320	Analyze and comment on publication notice (.70), and communications with Verita regarding same (.40)	1.10	1,127.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
05/22/2025	H P LONG, III	B320	Communications with counsel to Committee regarding by-laws for reorganized debtor and analyze issues related to same	0.60	615.00
05/23/2025	T P BROWN	B320	Conference with J.Rovira re confirmation strategy	0.50	742.50
05/23/2025	H P LONG, III	B320	Analyze solicitation materials from Verita (.50), and communications with Verita regarding the same (.60)	1.10	1,127.50
05/24/2025	T P BROWN	B320	Review emails with J.Rovira re Verita correction needed on solicitation date	0.10	148.50
05/27/2025	T P BROWN	B320	Emails with K.Courington re ballot inquiries	0.10	148.50
05/27/2025	T P BROWN	B320	Conference with J.Rovira re LMIC strategy and confirmation witnesses and prep	0.30	445.50
05/29/2025	T P BROWN	B320	Emails with committee counsel re proposed call on confirmation prep	0.10	148.50
05/29/2025	T P BROWN	B320	Work on confirmation outline and potential evidence and testimony	1.10	1,633.50
05/30/2025	T P BROWN	B320	Conferences and emails with T.Long re assumption of certain insurance agreements in proposed plan	0.30	445.50
05/30/2025	H P LONG, III	B320	Analyze issues related to treatment of certain insurance related agreement under plan	0.70	717.50
05/31/2025	T P BROWN	B320	Review email and claimant release form from T.Phillips	0.20	297.00
<b>TOTAL B320</b>				<b>84.80</b>	
<b>TOTAL HOURS</b>				<b>503.20</b>	

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**TIMEKEEPER SUMMARY:**

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
T P BROWN	Partner	163.10	1,485.00	242,203.50
G B FEHLING	Partner	1.00	1,200.00	1,200.00
J W HARBOUR	Partner	0.90	1,430.00	1,287.00
J P ROVIRA	Partner	27.80	1,100.00	30,580.00
H P LONG, III	Counsel	189.00	1,025.00	193,725.00
K T BAILEY	Associate	0.60	690.00	414.00
N S MONICO	Associate	47.80	695.00	33,221.00
C A RANKIN	Associate	22.80	895.00	20,406.00
R RUBIN	Associate	5.80	695.00	4,031.00
T L CANADA	Paralegal	44.40	410.00	18,204.00
<b>TOTAL FEES (\$)</b>				<b>545,271.50</b>

**TIME SUMMARY BY TASK CODE:**

CODE	DESCRIPTION	HOURS	VALUE
B110	Case Administration	29.70	18,246.00
B160	Fee / Employment Applications	16.50	13,296.00
B170	Fee / Employment Objections	14.90	16,698.00
B190	Other Contested Matters (excluding assumption / rejection motions)	327.70	367,924.50
B210	Business Operations	1.50	1,522.00
B310	Claims Administration and Objections	28.10	25,697.50
B320	Plan and Disclosure Statement (including Business Plan)	84.80	101,887.50
		<b>503.20</b>	<b>545,271.50</b>

**FOR COSTS ADVANCED AND EXPENSES INCURRED:**

CODE	DESCRIPTION	AMOUNT
E101	Copying	10.70
E106	Online Research	3,607.21
E109	Local Travel	41.00
E115	Deposition Transcripts	630.60
E116	Trial Transcripts	560.15
E118	Litigation Support Vendors	1,901.25
<b>TOTAL CURRENT EXPENSES (\$)</b>		<b>6,750.91</b>

**INVOICE SUMMARY:**

Current Fees:	\$ 545,271.50
Current Charges:	6,750.91
<b>CURRENT INVOICE AMOUNT DUE:</b>	<b>\$ 552,022.41</b>