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*Special Insurance Counsel for the Official
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**SUMMARY COVER SHEET TO THE FOURTH INTERIM FEE APPLICATION
OF MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE INTERIM PERIOD OF MARCH 1, 2025 THROUGH MAY 31, 2025**

Basic Information	
Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Petition Date:	June 30, 2024 (the “ Petition Date ”)
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Fourth Interim Fee Application	
Fourth Interim Period:	March 1, 2025 through May 31, 2025
Total Hours Billed:	157.4
Total Fees Requested:	\$221,346.00



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Total Expenses Requested:	\$9,247.56
Blended Rate for All Timekeepers:	\$1,406.26
Blended Rate for Attorneys:	\$1,455.60
Rate Increases Not Previously Approved or Disclosed:	Pursuant to internal operating procedures and past practices, Morgan Lewis adjusts as appropriate its hourly rates on January 1 st of each year. The table in this fourth interim fee application labeled “Summary of Professionals Rendering Services for the Fourth Interim Period” reflects the hourly rate increase for professionals and paraprofessionals providing services to the Unsecured Creditors’ Committee during the pendency of this case.
Total Professionals:	8
Total Professionals Billing Less Than 15 Hours:	5
Historical	
Fees Approved to Date by Interim Fee Order(s):	\$1,478,020.00
Expenses Approved to Date by Interim Fee Order(s):	\$70,231.82
Total Fees and Expenses Approved to Date:	\$1,548,251.82
Approved Amounts Paid to Date:	\$230,300.00
Fees Paid Pursuant to Monthly Statements for the Fourth Interim Period and Not Yet Allowed:	\$0.00
Expenses Paid Pursuant to Monthly Statements for the Fourth Interim Period and Not Yet Allowed:	\$0.00
Total Fees and Expenses Paid Pursuant to Monthly Statements for the Fourth Interim Period and Not Yet Allowed:	\$0.00
This is a(n):	<input type="checkbox"/> Monthly <input checked="" type="checkbox"/> Interim <input type="checkbox"/> Final Application

**MONTHLY FEE STATEMENTS
SUBJECT TO THE FOURTH INTERIM PERIOD:**

Docket No.	Period Covered	Requested		Paid	
		Fees	Expenses	Fees Paid	Expenses Paid
677	March 1, 2025 through March 31, 2025	\$86,186.80 (80% of \$107,733.50)	\$3,339.56	\$0.00	\$0.00
784	April 1, 2025, through April 30, 2025	\$38,116.40 (80% of \$47,645.50)	\$3,409.20	\$0.00	\$0.00

946	May 1, 2025 through May 31, 2025	\$52,773.60 (80% of \$65,967.00)	\$2,498.80	\$0.00	\$0.00
	Total	\$177,076.80 (80% of \$221,346.00)	\$9,247.56	\$0.00	\$0.00

PRIOR INTERIM FEE ORDER(S):

Docket No.	Period Covered	Requested		Allowed on Interim Basis	
		Fees	Expenses	Fees Allowed	Expenses Allowed
357	July 29, 2024 through August 31, 2024	\$230,210.00	\$90.00	\$230,210.00	\$90.00
558	September 1, 2024 through November 30, 2024	\$958,844.00	\$27,121.23	\$953,744.00 ¹	\$27,121.23
823	December 1, 2024 through February 28, 2025	\$297,566.00	\$43,020.59	\$294,066.00 ²	\$43,020.59

SUMMARY OF PROFESSIONALS RENDERING SERVICES FOR THE FOURTH INTERIM PERIOD:

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S	Partner	1995	Litigation	\$1,375.00	66.60	91,575.00
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	19.60	39,690.00
Gallo, Andrew	Partner	2000	Litigation	\$1,725.00	1.30	2,242.50
Nelson, James	Partner	2016	Litigation	\$1,175.00	1.90	2,232.50
Raskin, Jeffrey S	Partner	1993	Litigation	\$1,550.00	40.60	62,930.00
Raskin, Jeffrey	Partner	1993	Litigation	\$1,175.00	1.9	2,232.50
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	10.60	9,010.00
Shim, David K.	Associate	2016	Finance	\$1,100.00	8.50	9,350.00
				Total	149.10	\$217,030.00
Non-legal Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Guzzi, Tiffany	Sr. Paralegal	N/A	Litigation	\$520.00	8.30	4,316.00
				Total	8.30	\$4,316.00
				Aggregate Total	157.40	\$221,346.00
Blended Rate for Attorneys:						\$1,455.60
Blended Rate for All Timekeepers:						\$1,406.26

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

² \$337,086.59 includes a \$3,500 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Fee Application.

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

Task Code	Matter Description	Hours	Fees Requested
00	General	19.00	23,270.00
04	Case Administration & Calendar Control	3.40	2,406.00
07	Fee Applications - Self	20.00	19,927.50
08	Objections - Fee/Retention Applications	0.10	110.00
10	Litigation	103.80	160,125.00
11	Plan & Disclosure Statement	6.70	9,212.50
15	Committee Meetings/Conferences	4.40	6,295.00
TOTAL		157.40	\$221,346.00

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

Type	Expenses
Parking	\$75.00
Duplicating	\$80.76
Legal Research	456.00
Data Services Active	5,215.80
User Fees (Monthly) – Relativity	3,420.00
Total	\$9,247.56

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*Special Insurance Counsel for the Official
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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**FOURTH INTERIM FEE APPLICATION OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE INTERIM PERIOD OF MARCH 1, 2025 THROUGH MAY 31, 2025**

Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), submits this fourth interim fee application (the “**Fee Application**”) for allowance of compensation for professional services provided in the amount of \$221,346.00 and reimbursement of actual and necessary expenses in the amount of \$9,247.56 incurred during the interim period

from March 1, 2025 through May 31, 2025 (the “**Fourth Interim Period**”). In support of this Fee Application, Morgan Lewis respectfully states as follows:

Jurisdiction and Venue

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

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

3. The bases for the relief requested herein are sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “**Local Rules**”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief*, entered September 9, 2024 [Docket No. 162] (the “**Interim Compensation Order**”).

Background

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

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

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

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

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

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

[Docket No. 495]. On February 13, 2025, the Court approved the Second Interim Fee Application, allowing compensation for professional services rendered and reimbursement for expenses incurred in the aggregate amount of \$980,865.23.³

9. Additionally, on April 14, 2025, Morgan Lewis filed its third interim fee application seeking allowance and compensation for professional services in the amount of \$297,566.00 and reimbursement of actual and necessary expenses in the amount of \$43,020.59 for the period from December 1, 2024 to February 28, 2025 (the “**Third Interim Fee Application**”) [Docket No. 653]. On May 30, 2025, the Court approved the Third Interim Fee Application, allowing compensation for professional services rendered and reimbursement for expenses incurred in the aggregate amount of \$337,086.59.⁴

10. Morgan Lewis has received payment of the amounts approved by the Court in connection with the First Interim Fee Application and it is awaiting payments for the amounts approved by the Court in connection with the Second and Third Interim Fee Applications. Morgan Lewis has not yet received any payments for the Fourth Interim Period based on the monthly fee statements. Accordingly, and based on those monthly fee statements for the Fourth Interim Period, Morgan Lewis hereby submits this Fourth Interim Fee Application, seeking allowance of compensation for professional services in the amount of \$221,346.00 (inclusive of the 20% holdback) and reimbursement of actual and necessary expenses in the amount of \$9,247.56.

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

⁴ \$337,086.59 includes a \$3,500 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Third Interim Fee Application.

Services Rendered and Disbursements Incurred

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

- a. Advising the Committee on steps to preserve and maximize insurance coverage for creditors in the context of plan of reorganization under section 524(g) of the Bankruptcy Code;
- b. Attending meetings and conferring with representatives of the Debtor in connection with the formulation of such a plan of reorganization;
- c. Analyzing and assisting the Committee and its representatives with respect to the preparation of plan-related documents;
- d. Analyzing and assisting the Committee in evaluating and addressing any potential objections to the plan of reorganization by non-settling insurers; and
- e. Providing additional advice or actions related to the Debtor's insurance coverage as needed by the Committee.

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

13. The Interim Compensation Order authorized the monthly payment of eighty percent (80%) of fees and one hundred percent (100%) of expenses incurred by estate professionals, absent a timely objection upon notice to designated parties. Pursuant to the Interim Compensation Order, and as detailed above, Morgan Lewis filed its monthly fee statements for the Fourth Interim Period,

seeking compensation of \$177,076.80 (80% of \$221,346.00) and reimbursement of total expenses incurred in the amount of \$9,247.56.

14. Through this Fee Application, Morgan Lewis seeks allowance of compensation for professional services in the full amount of \$221,346.00 (inclusive of the 20% holdback) and reimbursement of actual and necessary expenses in the amount of \$9,247.56 incurred during the Fourth Interim Period. During the Fourth Interim Period, Morgan Lewis expended a total 157.40 hours on this matter. Narrative descriptions of the services performed and the time expended during the Fourth Interim Period are provided below, organized by task or proceeding where applicable.

A. General

Total Fees: \$23,270.00
Total Hours: 19.00

15. These task codes reflect time spent by Morgan Lewis professionals evaluating various case pleadings and preparing for and attending hearings bearing on insurance coverage issues.

B. Committee Meetings/Conferences

Total Fees: \$6,295.00
Total Hours: \$4.40

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

C. Case Administration & Calendar Control

Total Fees: \$2,406.00
Total Hours: 3.40

17. This task code covers time spent on tasks necessary for the efficient administration of legal services related to the Chapter 11 Case. Specifically, Morgan Lewis professionals

monitored critical dates, maintained a case calendar, task lists, and work-in-progress reports, and established procedures for case administration and docket monitoring.

D. Litigation

Total Fees: \$160,125.00

Total Hours: 103.80

18. This task code covers time spent by Morgan Lewis professionals on litigation matters related to the Chapter 11 Case, including: (i) engaging in the Court-ordered mediation with the Debtor and others, negotiating and participating in the drafting of the provisions of a resulting term sheet, plan, and plan-related documents, conferring with the debtor as to litigation initiated by the debtor's insurers, and advising on the status of these activities to the Committee and (ii) analysis and related to adversary proceedings filed in the Chapter 11 Case.

E. Plan & Disclosure Statement

Total Fees: \$9,212.50

Total Hours: 0

19. This task code covers time spent by Morgan Lewis professionals on matters relating to the Debtor's Chapter 11 Plan and Disclosure Statement, including collaborating with other committee professionals in the drafting of a proposed plan of reorganization and related plan documents.

F. Fee Applications

Total Fees: \$19,927.50

Total Hours: 20.00

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

G. Objections – Fee/Retention Applications

Total Fees: \$110.00

Total Hours: 0.10

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

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

H. Expenses

23. In addition to the fees incurred above, Morgan Lewis incurred actual and necessary expenses during the Fourth Interim Period totaling \$9,247.56. Included in **Exhibit B** are itemizations, where applicable, of expenses for which Morgan Lewis seeks reimbursement in this Fee Application. All expenses for which reimbursement is sought were incurred on behalf of the Committee and no other person.

Morgan Lewis’s Requested Compensation and Reimbursement Should be Allowed

24. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court’s award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code “reasonable compensation for actual necessary services rendered . . . and reimbursement for actual,

necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

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

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

25. In determining the reasonableness of a compensation request, courts generally apply the lodestar method. *Boddy v. United States Bankruptcy Court (In re Boddy)*, 950 F.2d 334, 337 (6th Cir. 1991) (“The Supreme Court has made it clear that the lodestar method of fee calculation is the method by which federal courts should determine reasonable attorney’s fees under federal statutes that provide for such fees.”); *Shaw, Licitra, Parente, Esernio & Schwartz, P.Z. v. Travelers Indemnity Co. (In re Grant Associates)*, 154 B.R. 836, 843 (S.D.N.Y. 1993) (noting that the lodestar standard had been adopted by most courts calculating fees under section 330(a), and that “[g]iven the similarity in context and language between the two statutes, the same standard should apply” to fees under section 506(c)); *In re Drexel Burnham Lambert Grp., Inc.*,

133 B.R. 13, 21-22 (Bankr. S.D.N.Y. 1991). Courts calculate the lodestar amount by multiplying the number of hours reasonably expended by the attorney's reasonable hourly rate. *See Drexel*, 133 B.R. at 22 (citing *Pennsylvania v. Delaware Valley Citizens' Council for Clean Air*, 478 U.S. 546, 565 (1986)). In assessing the reasonableness of a compensation request, there is a "strong presumption" that an attorney is entitled to the lodestar fee. *Id.*

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

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

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

Statement Pursuant to Appendix B Guidelines

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

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

Response: No.

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

Response: Not applicable.

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

Response: No.

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

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

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

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

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

Response: No.

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

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

WHEREFORE, Morgan Lewis requests that the Court enter an order: (a) awarding Morgan Lewis compensation for services rendered during the Fourth Interim Period in the amount of

\$221,346.00, and reimbursement of actual, reasonable, and necessary expenses incurred during the Fourth Interim Period in the amount of \$9,247.56; (b) authorizing and directing the Debtor to remit payment to Morgan Lewis for such fees and expenses that remain unpaid; and (c) granting any further relief the Court deems just and appropriate under the circumstances.

Dated: July 16, 2025

By: /s/ Brady Edwards
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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**ORDER GRANTING THE FOURTH INTERIM FEE APPLICATION OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
INTERIM PERIOD OF MARCH 1, 2025 THROUGH MAY 30, 2025**

Under consideration of the *Fourth Interim Fee Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of March 1, 2025 through May 30, 2025* (the “**Fee Application**”);¹ and the Court having reviewed the Fee Application, the matters contained therein, and exhibits thereto and

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

having found that the attorneys' fees accrued and expenses incurred should be allowed as set forth herein and paid by the above-captioned debtor (the "**Debtor**"), the Court orders as follows:

1. The Fee Application is approved as set forth herein.
2. Morgan Lewis is hereby granted, on an interim basis, allowance of compensation for professional services rendered and reimbursement for expenses incurred for the period from March 1, 2025 through May 30, 2025, in the aggregate amount of \$230,593.56.
3. The Debtor is hereby authorized and directed to remit to Morgan Lewis all unpaid fees and expenses allowed pursuant to this Order.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

Dated: _____, 2025
Richmond, Virginia

HONORABLE KEITH L. PHILLIPS
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: _____

WE ASK FOR THIS:

CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)

Todd E. Phillips (admitted *pro hac vice*)

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

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San Francisco, CA 94105-1596

Telephone: (415) 442-1000

Facsimile: (415) 442-1001

Email: jeffrey.raskin@morganlewis.com

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

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

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

/s/ Jeffrey A. Liesemer

EXHIBIT A

Morgan Lewis Retention Order

CAPLIN & DRYSDALE, CHARTERED

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

*Counsel for the Official
Committee of Unsecured Creditors*

MORGAN, LEWIS & BOCKIUS LLP

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

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

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

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

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

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

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

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

IT IS HEREBY ORDERED THAT:

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

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

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

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

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

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

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

Oct 4 2024

Dated: _____, 2024
Richmond, Virginia

/s/ Keith L Phillips

HONORABLE KEITH L. PHILLIPS
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: Oct 4 2024

WE ASK FOR THIS:

CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
Jeffrey A. Liesemer (VSB No. 35918)
Nathaniel R. Miller (admitted *pro hac vice*)
1200 New Hampshire Avenue NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000
Facsimile: (202) 429-3301
Email: kmaclay@capdale.com
tphillips@capdale.com
jliesemer@capdale.com
nmiller@capdale.com

*Counsel to the Official
Committee of Unsecured Creditors*

MORGAN, LEWIS & BOCKIUS LLP

Brady Edwards (admitted *pro hac vice*)
1000 Louisiana Street, Suite 4000
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Telephone: (415) 442-1000
Facsimile: (415) 442-1001
Email: jeffrey.raskin@morganlewis.com

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

SEEN AND NO OBJECTION:

/s/ Kathryn Montgomery

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

United States Trustee

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

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

/s/ Jeffrey A. Liesemer

EXHIBIT B

Invoices

CAPLIN & DRYSDALE, CHARTERED

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

Counsel for the Official Committee of Unsecured Creditors

MORGAN, LEWIS & BOCKIUS LLP

Brady Edwards (admitted *pro hac vice*)
1000 Louisiana Street, Suite 4000
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Telephone: (415) 442-1000

Special Insurance Counsel for the Official Committee of Unsecured Creditors

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**EIGHTH MONTHLY FEE STATEMENT OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL
INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICE RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD OF MARCH 1, 2025 THROUGH MARCH 31, 2025**

Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Time Period Covered:	March 1, 2025 through March 31, 2025
Total Fees Requested:	\$86,186.80 (80% of \$107,733.50)
Total Expenses Requested:	\$3,339.56

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

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the “**Local Rules**”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief*, entered September 9, 2024 [Docket No. 162] (the “**Interim Compensation Order**”), Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) for the reasonable and necessary legal services rendered by Morgan Lewis for the period March 1, 2025 through March 31, 2025 (the “**Fee Period**”) and reimbursement of the actual and necessary expenses that Morgan Lewis incurred during the Fee Period. By this Monthly Fee Statement, Morgan Lewis seeks payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$89,526.36, consisting of (i) \$86,186.80, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$3,339.56 for actual and necessary costs and expenses.

Itemization of Services Rendered and Disbursement Incurred

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

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

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

Representations

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

Notice

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

[Remainder of page left blank]

WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$89,526.36, consisting of (i) \$86,186.80, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$3,339.56 for actual and necessary costs and expenses.

Dated: April 21, 2025

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

ELECTRONICALLY FILED BY:

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

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

Task Code	Matter Description	Hours	Fees Requested
04	Case Administration & Calendar Control	2.90	\$1,856.00
07	Fee Application – Self	4.80	\$4,430.00
10	Litigation	63.50	\$100,827.50
15	Committee Meetings/Conferences	0.40	\$620.00
<u>TOTAL</u>		<u>71.60</u>	<u>\$107,733.50</u>

EXHIBIT B

Professionals Rendering Services During the Fee Period

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

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S.	Partner	1995	Litigation	\$1,375.00	29.70	\$40,837.50
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	16.00	\$32,400.00
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	18.20	\$28,210.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	3.40	\$2,890.00
Shim, David	Associate	2016	Finance	\$1,100.00	2.00	\$2,200.00
				Total	69.30	\$106,537.50

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

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Guzzi, Tiffany A.	Paralegal	Litigation	\$520.00	2.30	\$1,196.00
			Total	2.30	\$1,196.00

EXHIBIT C

Summary of Expenses Incurred During the Fee Period

Type	Expenses
Data Services – R	\$1,738.80
Duplicating	\$80.76
User Fees (Monthly) – Relativity	\$1,520.00
<u>Total</u>	\$3,339.56

EXHIBIT D

Invoices

Morgan Lewis

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

Invoice Date: April 21, 2025
Invoice Number 5644658
Account No. 139505-0001

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

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

Re: Hopeman Creditors Committee

Fees	\$	107,733.50
Disbursements	\$	3,339.56
Total Current Period Charges	\$	111,073.06

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

Morgan Lewis

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

Invoice Date: April 21, 2025
Invoice Number 5644658
Account No. 139505-0001

REMITTANCE COPY

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

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

Re: Hopeman Creditors Committee

Fees	\$	107,733.50
Disbursements	\$	3,339.56
Total Current Period Charges	\$	111,073.06

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

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

Or please wire your remittance to:
Wells Fargo Bank, N.A.
ABA# 121000248
Morgan, Lewis & Bockius LLP
Acct# 2100010985563
Swift Code: WFBUS6S

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

Remittance detail address
cashapplication@morganlewis.com

Morgan Lewis

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

Detail of Outstanding Invoices

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

Invoice Date	Invoice Number	Invoice Amount	Payments/Credits	Days Outstanding	Balance Due
10/18/24	5530494	238,023.66	1,700.00	185	236,323.66
11/15/24	5552180	309,570.64	1,700.00	157	307,870.64
12/13/24	5570374	438,370.93	1,700.00	129	436,670.93
01/10/25	5588017	84,074.65	0.00	101	84,074.65
02/14/25	5608788	153,188.36	0.00	66	153,188.36
03/17/25	5623718	103,323.58	0.00	35	103,323.58
TOTAL OUTSTANDING					\$ 1,321,451.82

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

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

Or please wire your remittance to:
Wells Fargo Bank, N.A.
 ABA# 121000248
 Morgan, Lewis & Bockius LLP
 Acct# 2100010985563
 Swift Code: WFBUS6S

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

Remittance detail address
 cashapplication@morganlewis.com

Morgan Lewis

April 21, 2025
Page 1

Invoice Number 5644658
Account No. 139505-0001

Detail for Fee Services Rendered

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
03/01/25	10	Litigation	Analyze revised term sheet and correspondence with Caplin team regarding same.	Cox, D.S.	1,375.00	0.30	412.50
03/01/25	10	Litigation	Telephone conferences and communications with Caplin and committee's counsel regarding mediation strategy.	Edwards, B.	2,025.00	0.50	1,012.50
03/01/25	10	Litigation	Analysis and comment on further revisions to 524(g) term sheet.	Raskin, J. S.	1,550.00	0.40	620.00
03/02/25	10	Litigation	Analyze Chubb brief and exchange correspondence with Caplin and MLB teams regarding same.	Cox, D.S.	1,375.00	0.80	1,100.00
03/02/25	10	Litigation	Analyze Chubb response to Hopeman's second motion to extend exclusivity period and related declaration in support to formulate strategy for next steps.	Edwards, B.	2,025.00	0.80	1,620.00
03/02/25	10	Litigation	Analyze correspondence regarding term sheet.	Edwards, B.	2,025.00	0.20	405.00
03/02/25	10	Litigation	Analysis and comment on Chubb's filing on exclusivity (0.5); analysis and comment on further revised 524(g) term sheet (0.7).	Raskin, J. S.	1,550.00	1.20	1,860.00

Morgan Lewis

April 21, 2025
Page 2

Invoice Number 5644658
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
03/03/25	10	Litigation	Analyze revisions to term sheet, confer with Caplin team regarding same and continued mediation discussions.	Cox, D.S.	1,375.00	4.50	6,187.50
03/03/25	10	Litigation	Strategic communications with committee's counsel, Caplin, and internal team regarding revisions to proposed term sheet and ongoing mediation issues.	Edwards, B.	2,025.00	2.30	4,657.50
03/03/25	10	Litigation	Video conference regarding proposed revisions to term sheet in preparation for upcoming mediation session.	Edwards, B.	2,025.00	0.50	1,012.50
03/03/25	10	Litigation	Prepare for and attend continued mediation session with debtor.	Edwards, B.	2,025.00	0.70	1,417.50
03/03/25	04	Case Administration & Calendar Control	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
03/03/25	10	Litigation	Communications with Committee counsel concerning potential revisions to 524(g) term sheet (2.0); analyze and comment on multiple versions of revised 524(g) term sheet (1.6); communications with Hopeman and HII (1.3)	Raskin, J. S.	1,550.00	4.90	7,595.00
03/03/25	04	Case Administration & Calendar Control	Communicate with the MLB working group to provide and receive updates on case status (.5).	Shim, D. K.	1,100.00	0.50	550.00

Morgan Lewis

April 21, 2025
Page 3

Invoice Number 5644658
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
03/04/25	10	Litigation	Continued mediation sessions with HII and debtor and revisions to term sheet and confer with Caplin and MLB teams in connection with same.	Cox, D.S.	1,375.00	5.10	7,012.50
03/04/25	10	Litigation	Continue mediation and work with Caplin, committee counsel, and internal team regarding related issues.	Edwards, B.	2,025.00	2.90	5,872.50
03/04/25	04	Case Administration & Calendar Control	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
03/04/25	10	Litigation	Conferences concerning revised versions of 524(g) term sheet (1.3); internal communications and communications with Committee counsel concerning revised versions of 524(g) term sheet (2.0).	Raskin, J. S.	1,550.00	3.30	5,115.00
03/05/25	10	Litigation	Continued mediation efforts, analysis of revisions to term sheet, confer with Caplin and MLB teams regarding same.	Cox, D.S.	1,375.00	3.70	5,087.50
03/05/25	10	Litigation	Continue mediation regarding Louisiana issues, term sheet, and ongoing communications with Caplin and committee counsel.	Edwards, B.	2,025.00	2.30	4,657.50
03/05/25	04	Case Administration & Calendar Control	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00

Morgan Lewis

April 21, 2025
Page 4

Invoice Number 5644658
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
03/05/25	10	Litigation	Internal communications concerning further revisions to 524(g) term sheet (2.3); conferences with Committee counsel concerning revisions to 524(g) term sheet (0.8).	Raskin, J. S.	1,550.00	3.10	4,805.00
03/06/25	10	Litigation	Continued mediation discussion and work toward finalization of term sheet.	Cox, D.S.	1,375.00	1.60	2,200.00
03/06/25	10	Litigation	Continue ongoing mediation regarding revisions to term sheet.	Edwards, B.	2,025.00	1.20	2,430.00
03/06/25	04	Case Administration & Calendar Control	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
03/06/25	10	Litigation	Conferences concerning further revised versions of the 524(g) term sheet (1.1); analyze and comment on further revised versions of 524(g) term sheet (1.0).	Raskin, J. S.	1,550.00	2.10	3,255.00
03/07/25	10	Litigation	Confer internally and with HII and Debtor counsel regarding finalization of term sheet and analyze debtor filing regarding same.	Cox, D.S.	1,375.00	1.10	1,512.50
03/07/25	10	Litigation	Continue mediation and numerous telephone conferences related to same.	Edwards, B.	2,025.00	2.70	5,467.50
03/07/25	10	Litigation	Internal communications concerning revised 524(g) term sheet.	Raskin, J. S.	1,550.00	1.30	2,015.00

Morgan Lewis

April 21, 2025
Page 5

Invoice Number 5644658
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
03/08/25	10	Litigation	Analyze debtor's filings for following week's hearing.	Cox, D.S.	1,375.00	0.20	275.00
03/09/25	10	Litigation	Analyze Chubb brief and correspondence with team regarding March 10th hearing.	Cox, D.S.	1,375.00	1.30	1,787.50
03/10/25	10	Litigation	Prepare for and attend status conference and motion hearing.	Cox, D.S.	1,375.00	1.40	1,925.00
03/10/25	04	Case Administration & Calendar Control	Evaluate case pleadings and omnibus hearings notice.	Guzzi, T. A.	520.00	0.40	208.00
03/11/25	10	Litigation	Prepare for videoconference with Louisiana counsel.	Cox, D.S.	1,375.00	0.30	412.50
03/11/25	04	Case Administration & Calendar Control	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
03/11/25	04	Case Administration & Calendar Control	Communicate with the MLB working group regarding case status (.1).	Shim, D. K.	1,100.00	0.10	110.00
03/12/25	10	Litigation	Prepare for telephone conference with constituent.	Cox, D.S.	1,375.00	0.40	550.00
03/13/25	10	Litigation	Prepare for meeting with constituent.	Cox, D.S.	1,375.00	0.40	550.00
03/14/25	10	Litigation	Prepare for and attend videoconference with constituent.	Cox, D.S.	1,375.00	0.90	1,237.50
03/17/25	10	Litigation	Telephone conference with T. Phillips regarding trust distribution procedures.	Cox, D.S.	1,375.00	0.60	825.00
03/17/25	07	Fee Applications - Self	Follow up regarding Seventh Monthly Fee Statement.	DeSantis, C. M.	850.00	0.40	340.00

Morgan Lewis

April 21, 2025
Page 6

Invoice Number 5644658
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
03/17/25	07	Fee Applications - Self	Correspond with MLB working group regarding February monthly statement (.3).	Shim, D. K.	1,100.00	0.30	330.00
03/17/25	07	Fee Applications - Self	Review interim compensation procedures order regarding interim fee application (.1).	Shim, D. K.	1,100.00	0.10	110.00
03/17/25	07	Fee Applications - Self	Correspond with C. DeSantis regarding interim fee application (.2).	Shim, D. K.	1,100.00	0.20	220.00
03/18/25	10	Litigation	Prepare for and participate in videoconference with constituent regarding term sheet; analyze claim issue and correspondence with Caplin team regarding same.	Cox, D.S.	1,375.00	3.10	4,262.50
03/18/25	07	Fee Applications - Self	Follow up regarding Seventh Monthly Fee Statement.	DeSantis, C. M.	850.00	0.20	170.00
03/18/25	10	Litigation	Prepare for and conduct video conference with constituent regarding potential resolution, including follow-up telephone conferences regarding same.	Edwards, B.	2,025.00	1.50	3,037.50
03/18/25	04	Case Administration & Calendar Control	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
03/18/25	07	Fee Applications - Self	Correspond with MLB working group regarding monthly fee statement (.1).	Shim, D. K.	1,100.00	0.10	110.00
03/18/25	07	Fee Applications - Self	Correspond with C. DeSantis regarding proposed order (.1).	Shim, D. K.	1,100.00	0.10	110.00

Morgan Lewis

April 21, 2025
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Invoice Number 5644658
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
03/20/25	10	Litigation	Exchange correspondence with J. Rovira regarding status of appeals from order approving Resolute settlement.	Cox, D.S.	1,375.00	0.20	275.00
03/21/25	07	Fee Applications - Self	Follow up with K. Cooper regarding revisions to monthly fee statement.	DeSantis, C. M.	850.00	0.20	170.00
03/21/25	07	Fee Applications - Self	Follow up with UCC counsel regarding finalizing and filing Seventh Monthly Fee Statement.	DeSantis, C. M.	850.00	0.20	170.00
03/21/25	07	Fee Applications - Self	Review correspondence with Caplin regarding monthly fee statement (.1).	Shim, D. K.	1,100.00	0.10	110.00
03/24/25	10	Litigation	Telephone conference with Caplin and MLB teams regarding trust-related issues.	Cox, D.S.	1,375.00	0.40	550.00
03/24/25	10	Litigation	Video conference with Caplin regarding trust issues.	Edwards, B.	2,025.00	0.40	810.00
03/24/25	04	Case Administration & Calendar Control	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
03/24/25	15	Committee Meetings/Conferences	Conference with Committee counsel concerning certain Plan issues.	Raskin, J. S.	1,550.00	0.40	620.00
03/24/25	07	Fee Applications - Self	Correspond with MLB working group regarding third interim fee application (.2).	Shim, D. K.	1,100.00	0.20	220.00

Morgan Lewis

April 21, 2025
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Invoice Number 5644658
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
03/25/25	10	Litigation	Telephone conference with J. Rovira regarding 524(g) plan and related documents, correspondence with Caplin and MLB teams regarding same, and analyze draft Trust Agreement.	Cox, D.S.	1,375.00	1.60	2,200.00
03/25/25	10	Litigation	Attend Committee meeting; internal communication concerning Committee meeting.	Raskin, J. S.	1,550.00	1.00	1,550.00
03/26/25	07	Fee Applications - Self	Draft Third Interim Fee Application (1.8); call with D. Shim regarding same (.4).	DeSantis, C. M.	850.00	2.20	1,870.00
03/26/25	07	Fee Applications - Self	Follow up with UST regarding seventh monthly fee statement.	DeSantis, C. M.	850.00	0.20	170.00
03/27/25	10	Litigation	Analyze draft trust agreement and prepare correspondence with Caplin team regarding same.	Cox, D.S.	1,375.00	0.80	1,100.00
03/27/25	04	Case Administration & Calendar Control	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
03/27/25	10	Litigation	Analyze and comment on FCR and Trustee issues in connection with insurance coverage for asbestos cases post-confirmation.	Raskin, J. S.	1,550.00	0.50	775.00
03/27/25	07	Fee Applications - Self	Review the draft third interim fee application (.3).	Shim, D. K.	1,100.00	0.30	330.00

Morgan Lewis

April 21, 2025
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Invoice Number 5644658
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
03/31/25	10	Litigation	Prepare for and conduct telephone conference with A. McMillan regarding trust distribution procedures, confer with J. Raskin regarding same.	Cox, D.S.	1,375.00	1.00	1,375.00
03/31/25	04	Case Administration & Calendar Control	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
Matter Total						71.60	\$ 107,733.50

April 21, 2025
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Invoice Number 5644658
Account No. 139505-0001

Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	29.70	1,375.00	40,837.50
Edwards, B.	16.00	2,025.00	32,400.00
Raskin, J. S.	18.20	1,550.00	28,210.00
ASSOCIATE			
DeSantis, C. M.	3.40	850.00	2,890.00
Shim, D. K.	2.00	1,100.00	2,200.00
PARALEGAL			
Guzzi, T. A.	2.30	520.00	1,196.00
Matter Total	71.60		\$ 107,733.50

Morgan Lewis

April 21, 2025
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Invoice Number 5644658
Account No. 139505-0001

Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
02/11/25	Cox, David S	Other Duplicating - Print 153 @ .12	18.36
02/11/25	Cox, David S	Other Duplicating - Color 2@ .48	0.96
02/11/25	Cox, David S	Other Duplicating - Color 128 @ .48	61.44
03/31/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; March; 16.00 User	1,520.00
03/31/25	Data Services, Data Services	Data Services Active - R fee; March; 86.94 GB	1,738.80
Total Disbursements			\$ 3,339.56

Morgan Lewis

April 21, 2025
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Invoice Number 5644658
Account No. 139505-0001

Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Duplicating/Printing	80.76
Hosting	1,738.80
User Fees	1,520.00
Total Disbursements	\$ 3,339.56

CAPLIN & DRYSDALE, CHARTERED

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

Counsel for the Official Committee of Unsecured Creditors

MORGAN, LEWIS & BOCKIUS LLP

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

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

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

Special Insurance Counsel for the Official Committee of Unsecured Creditors

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**NINTH MONTHLY FEE STATEMENT OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL
INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICE RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD OF APRIL 1, 2025 THROUGH APRIL 30, 2025**

Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Time Period Covered:	April 1, 2025 through April 30, 2025
Total Fees Requested:	\$38,116.40 (80% of \$47,645.50)
Total Expenses Requested:	\$3,409.20

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

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the “**Local Rules**”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief*, entered September 9, 2024 [Docket No. 162] (the “**Interim Compensation Order**”), Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) for the reasonable and necessary legal services rendered by Morgan Lewis for the period April 1, 2025 through April 30, 2025 (the “**Fee Period**”) and reimbursement of the actual and necessary expenses that Morgan Lewis incurred during the Fee Period. By this Monthly Fee Statement, Morgan Lewis seeks payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$41,525.60, consisting of (i) \$38,116.40, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$3,409.20 for actual and necessary costs and expenses.

Itemization of Services Rendered and Disbursement Incurred

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

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

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

Representations

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

Notice

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

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WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$41,525.60, consisting of (i) \$38,116.40, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$3,409.20 for actual and necessary costs and expenses.

Dated: May 21, 2025

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

ELECTRONICALLY FILED BY:

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

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

Task Code	Matter Description	Hours	Fees Requested
00	General	11.00	\$14,578.00
04	Case Administration & Calendar Control	0.50	\$550.00
07	Fee Application – Self	10.50	\$10,487.50
10	Litigation	12.70	\$17,657.50
11	Plan & Disclosure Statement	2.10	\$2,887.50
15	Committee Meetings/Conferences	1.00	\$1,375.00
<u>TOTAL</u>		<u>37.90</u>	<u>\$47,645.50</u>

EXHIBIT B

Professionals Rendering Services During the Fee Period

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

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S.	Partner	1995	Litigation	\$1,375.00	17.00	\$23,375.00
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	0.30	\$607.50
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	8.60	\$13,330.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	5.90	\$5,015.00
Shim, David	Associate	2016	Finance	\$1,100.00	3.70	\$4,070.00
				Total	35.50	46,397.50

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

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Guzzi, Tiffany A.	Paralegal	Litigation	\$520.00	2.40	\$1,248.00
			Total	2.40	\$1,248.00

EXHIBIT C

Summary of Expenses Incurred During the Fee Period

Type	Expenses
Data Services – R	\$1,738.80
Parking	\$75.00
Westlaw	\$76.00
User Fees (Monthly) – Relativity	\$1,520.00
<u>Total</u>	\$3,409.20

EXHIBIT D

Invoices

Morgan Lewis

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

Invoice Date: May 13, 2025
Invoice Number 5664512
Account No. 139505-0001

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

Summary of Services for the period ended April 30, 2025:

Re: Hopeman Creditors Committee

Fees	\$	47,645.50
Disbursements	\$	3,409.20
Total Current Period Charges	\$	51,054.70

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

Morgan Lewis

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

Invoice Date: May 13, 2025
Invoice Number 5664512
Account No. 139505-0001

REMITTANCE COPY

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

Summary of Services for the period ended April 30, 2025:

Re: Hopeman Creditors Committee

Fees	\$	47,645.50
Disbursements	\$	3,409.20
Total Current Period Charges	\$	51,054.70

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

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

Or please wire your remittance to:
Wells Fargo Bank, N.A.
ABA# 121000248
Morgan, Lewis & Bockius LLP
Acct# 2100010985563
Swift Code: WFBUS6S

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

Remittance detail address
cashapplication@morganlewis.com

Morgan Lewis

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

Detail of Outstanding Invoices

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

Invoice Date	Invoice Number	Invoice Amount	Payments/Credits	Days Outstanding	Balance Due
10/18/24	5530494	238,023.66	1,700.00	207	236,323.66
11/15/24	5552180	309,570.64	1,700.00	179	307,870.64
12/13/24	5570374	438,370.93	1,700.00	151	436,670.93
01/10/25	5588017	84,074.65	0.00	123	84,074.65
02/14/25	5608788	153,188.36	0.00	88	153,188.36
03/17/25	5623718	103,323.58	0.00	57	103,323.58
04/21/25	5644658	111,073.06	0.00	22	111,073.06
TOTAL OUTSTANDING					\$ 1,432,524.88

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

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

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

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

Remittance detail address
 cashapplication@morganlewis.com

Morgan Lewis

May 13, 2025
Page 1

Invoice Number 5664512
Account No. 139505-0001

Detail for Fee Services Rendered

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
04/01/25	15	Committee Meetings/Conferences	Prepare for and attend videoconference with committee representatives.	Cox, D.S.	1,375.00	1.00	1,375.00
04/01/25	07	Fee Applications - Self	Telephone conference with D. Shim regarding Hopeman interim fee application.	DeSantis, C. M.	850.00	0.30	255.00
04/01/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
04/01/25	00	General	Attend Committee meeting.	Raskin, J. S.	1,550.00	0.50	775.00
04/02/25	07	Fee Applications - Self	Revise Hopeman fee application.	DeSantis, C. M.	850.00	1.20	1,020.00
04/02/25	07	Fee Applications - Self	Revise draft of MLB's third interim fee application and exhibits.	Shim, D. K.	1,100.00	0.80	880.00
04/03/25	10	Litigation	Telephone conference with J. Rovira regarding bankruptcy plan (.4) analyze plan documents and prepare correspondence to Caplin and MLB teams regarding same (3.3).	Cox, D.S.	1,375.00	3.70	5,087.50
04/03/25	00	General	Analyze and comment on certain plan issues.	Raskin, J. S.	1,550.00	1.80	2,790.00
04/03/25	07	Fee Applications - Self	Revise MLB interim fee application and exhibits (.3); correspond with C. Desantis regarding same (.2).	Shim, D. K.	1,100.00	0.50	550.00
04/04/25	10	Litigation	Prepare for and conduct videoconference with Caplin team regarding 524(g) plan.	Cox, D.S.	1,375.00	1.40	1,925.00

Morgan Lewis

May 13, 2025
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Invoice Number 5664512
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
04/04/25	00	General	Evaluate case discovery documents.	Guzzi, T. A.	520.00	0.20	104.00
04/04/25	00	General	Video conference with the Committee counsel concerning plan issues.	Raskin, J. S.	1,550.00	0.50	775.00
04/07/25	11	Plan & Disclosure Statement	Analyze plan materials and prepare correspondence to Caplin team regarding same.	Cox, D.S.	1,375.00	0.50	687.50
04/07/25	07	Fee Applications - Self	Follow up regarding Hopeman fee application.	DeSantis, C. M.	850.00	0.20	170.00
04/07/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
04/07/25	00	General	Communications concerning certain plan-related issues.	Raskin, J. S.	1,550.00	0.70	1,085.00
04/08/25	10	Litigation	Videoconference with Caplin and MLB teams regarding 524(g) plan, analyze revisions to same and prepare correspondence to Caplin team regarding same.	Cox, D.S.	1,375.00	1.10	1,512.50
04/08/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
04/08/25	00	General	Attend Committee meeting.	Raskin, J. S.	1,550.00	0.50	775.00
04/08/25	00	General	Video conference with Committee counsel concerning certain plan issues.	Raskin, J. S.	1,550.00	0.50	775.00
04/10/25	10	Litigation	Exchange correspondence with T. Phillips (Caplin) regarding inquiry pertaining to plan documents.	Cox, D.S.	1,375.00	0.30	412.50
04/10/25	07	Fee Applications - Self	Analyze fee application and provide instructions to C. DeSantis regarding same.	Cox, D.S.	1,375.00	0.40	550.00

Morgan Lewis

May 13, 2025
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Invoice Number 5664512
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
04/10/25	07	Fee Applications - Self	Revise Third Interim Fee Application to incorporate comments from D. Cox.	DeSantis, C. M.	850.00	1.00	850.00
04/10/25	07	Fee Applications - Self	Correspondence with MLB working group regarding MLB's third interim fee application (.5).	Shim, D. K.	1,100.00	0.50	550.00
04/10/25	08	Objections - Fee/Retention Applications	Analyze interim compensation procedures order in connection with Chubb's objection to MLB's monthly fee statement (.1).	Shim, D. K.	1,100.00	0.10	110.00
04/10/25	04	Case Administration & Calendar Control	Review pleadings filed on the chapter 11 docket of Hopeman concerning the Committee (.2).	Shim, D. K.	1,100.00	0.20	220.00
04/11/25	07	Fee Applications - Self	Analyze and revise fee application and confer with C. DeSantis and B. Edwards regarding same.	Cox, D.S.	1,375.00	0.70	962.50
04/11/25	07	Fee Applications - Self	Follow up regarding revisions to Third Interim Fee Application.	DeSantis, C. M.	850.00	1.00	850.00
04/11/25	07	Fee Applications - Self	Revise MLB's third interim fee application (.8).	Shim, D. K.	1,100.00	0.80	880.00
04/11/25	07	Fee Applications - Self	Prepare for and participate in telephone conference with C. DeSantis regarding MLB's third interim fee application (.2).	Shim, D. K.	1,100.00	0.20	220.00
04/14/25	07	Fee Applications - Self	Revise and finalize third interim fee application to incorporate additional comments from UCC counsel.	DeSantis, C. M.	850.00	1.00	850.00

Morgan Lewis

May 13, 2025
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Invoice Number 5664512
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
04/14/25	07	Fee Applications - Self	Correspondence with MLB working group regarding third interim fee application and monthly fee statement (.3).	Shim, D. K.	1,100.00	0.30	330.00
04/15/25	10	Litigation	Prepare for (.8) and conduct videoconference with committee professionals regarding revisions to plan documents (.7).	Cox, D.S.	1,375.00	1.50	2,062.50
04/15/25	07	Fee Applications - Self	Correspondence with UCC counsel, K. Cooper, and UST regarding third interim fee application.	DeSantis, C. M.	850.00	0.30	255.00
04/15/25	00	General	Conference concerning plan issues.	Raskin, J. S.	1,550.00	0.50	775.00
04/16/25	10	Litigation	Analyze correspondence from J. Rovira regarding constituent claims and correspondence to Caplin team regarding same.	Cox, D.S.	1,375.00	0.70	962.50
04/16/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
04/16/25	00	General	Conference and communications concerning certain Plan issues.	Raskin, J. S.	1,550.00	1.00	1,550.00
04/16/25	04	Case Administration & Calendar Control	Analyze Chubb's motion to compel 2019 disclosure (.3).	Shim, D. K.	1,100.00	0.30	330.00
04/17/25	10	Litigation	Videoconference with debtor counsel regarding pending appeal from December 2024 order.	Cox, D.S.	1,375.00	0.40	550.00
04/17/25	00	General	Evaluate case pleadings and hearing notices.	Guzzi, T. A.	520.00	0.30	156.00

Morgan Lewis

May 13, 2025
Page 5

Invoice Number 5664512
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
04/17/25	00	General	Video conference concerning certain Plan issues.	Raskin, J. S.	1,550.00	0.50	775.00
04/18/25	07	Fee Applications - Self	Instructions to C. DeSantis regarding finalization of interim fee application.	Cox, D.S.	1,375.00	0.20	275.00
04/18/25	10	Litigation	Prepare for and participate in videoconference with debtor counsel regarding finalization of plan documentation.	Cox, D.S.	1,375.00	0.50	687.50
04/18/25	07	Fee Applications - Self	Correspondence with MLB working group regarding revisions to monthly fee statement.	DeSantis, C. M.	850.00	0.30	255.00
04/18/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
04/21/25	10	Litigation	Analyze Chubb complaint and supporting exhibits and confer with Caplin team regarding same.	Cox, D.S.	1,375.00	1.40	1,925.00
04/21/25	07	Fee Applications - Self	Analyze MLB's interim fee application.	Cox, D.S.	1,375.00	0.20	275.00
04/21/25	07	Fee Applications - Self	Follow up and finalize eighth monthly fee statement to incorporate comments from UCC counsel.	DeSantis, C. M.	850.00	0.40	340.00
04/21/25	10	Litigation	Analyze Chubb adversary complaint and related correspondence.	Edwards, B.	2,025.00	0.30	607.50
04/21/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
04/21/25	00	General	Analyze and comment on Chubb's adversary breach of contract complaint.	Raskin, J. S.	1,550.00	0.70	1,085.00

Morgan Lewis

May 13, 2025
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Invoice Number 5664512
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
04/22/25	07	Fee Applications - Self	Follow up with UST regarding monthly fee statement.	DeSantis, C. M.	850.00	0.20	170.00
04/23/25	11	Plan & Disclosure Statement	Analyze and provide comments on FTI mediation-related analysis.	Cox, D.S.	1,375.00	1.40	1,925.00
04/23/25	00	General	Correspond with MLB working group concerning mediation-related analysis.	Raskin, J. S.	1,550.00	0.60	930.00
04/24/25	10	Litigation	Analyze Chubb motion for TRO.	Cox, D.S.	1,375.00	0.30	412.50
04/28/25	11	Plan & Disclosure Statement	Analyze FTI cash flow projections and correspondence to Caplin team regarding same.	Cox, D.S.	1,375.00	0.20	275.00
04/29/25	10	Litigation	Confer with debtor counsel regarding claims objection.	Cox, D.S.	1,375.00	1.10	1,512.50
04/29/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
04/30/25	00	General	Evaluate case pleadings and notice of hearing on various motions.	Guzzi, T. A.	520.00	0.40	208.00
04/30/25	00	General	Analyze and comment on Chubb's motion for a temporary restraining order and preliminary injunction.	Raskin, J. S.	1,550.00	0.80	1,240.00
Matter Total						37.90	\$ 47,645.50

Morgan Lewis

May 13, 2025
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Invoice Number 5664512
Account No. 139505-0001

Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	17.00	1,375.00	23,375.00
Edwards, B.	0.30	2,025.00	607.50
Raskin, J. S.	8.60	1,550.00	13,330.00
ASSOCIATE			
DeSantis, C. M.	5.90	850.00	5,015.00
Shim, D. K.	3.70	1,100.00	4,070.00
PARALEGAL			
Guzzi, T. A.	2.40	520.00	1,248.00
Matter Total	37.90		\$ 47,645.50

Morgan Lewis

May 13, 2025
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Invoice Number 5664512
Account No. 139505-0001

Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
02/23/25	Edwards, Brady	Parking - Brady Edwards - - parking	75.00
04/01/25	Cox, David S	WestLaw	76.00
04/30/25	Data Services, Data Services	Data Services Active - R fee; April; 86.91 GB	1,738.20
04/30/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; April; 16.00 User	1,520.00
Total Disbursements			\$ 3,409.20

Morgan Lewis

May 13, 2025
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Invoice Number 5664512
Account No. 139505-0001

Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Miscellaneous Travel	75.00
Legal Research	76.00
Hosting	1,738.20
User Fees	1,520.00
Total Disbursements	\$ 3,409.20

CAPLIN & DRYSDALE, CHARTERED

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

Counsel for the Official Committee of Unsecured Creditors

MORGAN, LEWIS & BOCKIUS LLP

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

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

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

Special Insurance Counsel for the Official Committee of Unsecured Creditors

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**TENTH MONTHLY FEE STATEMENT OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL
INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICE RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD OF MAY 1, 2025 THROUGH MAY 31, 2025**

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

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

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

Itemization of Services Rendered and Disbursement Incurred

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

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

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

Representations

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

Notice

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

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

Dated: July 7, 2025

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

ELECTRONICALLY FILED BY:

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

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

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

EXHIBIT B

Professionals Rendering Services During the Fee Period

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

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

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

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

EXHIBIT C

Summary of Expenses Incurred During the Fee Period

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

EXHIBIT D

Invoices

Morgan Lewis

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

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

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

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

Re: Hopeman Creditors Committee

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

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

Morgan Lewis

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

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

REMITTANCE COPY

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

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

Re: Hopeman Creditors Committee

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

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

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

Or please wire your remittance to:
Wells Fargo Bank, N.A.
ABA# 121000248
Morgan, Lewis & Bockius LLP
Acct# 2100010985563
Swift Code: WFBUS6S

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

Remittance detail address
cashapplication@morganlewis.com

Morgan Lewis

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

Detail of Outstanding Invoices

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

Invoice Date	Invoice Number	Invoice Amount	Payments/ Credits	Days Outstanding	Balance Due
10/18/24	5530494	238,023.66	1,700.00	241	236,323.66
11/15/24	5552180	309,570.64	1,700.00	213	307,870.64
12/13/24	5570374	438,370.93	1,700.00	185	436,670.93
01/10/25	5588017	84,074.65	0.00	157	84,074.65
02/14/25	5608788	153,188.36	0.00	122	153,188.36
03/17/25	5623718	103,323.58	0.00	91	103,323.58
04/21/25	5644658	111,073.06	0.00	56	111,073.06
05/13/25	5664512	51,054.70	0.00	34	51,054.70
TOTAL OUTSTANDING					\$ 1,483,579.58

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

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

Or please wire your remittance to:
Wells Fargo Bank, N.A.
 ABA# 121000248
 Morgan, Lewis & Bockius LLP
 Acct# 2100010985563
 Swift Code: WFBUS6S

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

Remittance detail address
 cashapplication@morganlewis.com

Morgan Lewis

June 16, 2025
Page 1

Invoice Number 5688180
Account No. 139505-0001

Detail for Fee Services Rendered

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

Morgan Lewis

June 16, 2025
Page 2

Invoice Number 5688180
Account No. 139505-0001

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

Morgan Lewis

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

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

Morgan Lewis

June 16, 2025
Page 4

Invoice Number 5688180
Account No. 139505-0001

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

Morgan Lewis

June 16, 2025
Page 5

Invoice Number 5688180
Account No. 139505-0001

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

Morgan Lewis

June 16, 2025
Page 6

Invoice Number 5688180
Account No. 139505-0001

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

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

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Summary for Fee Services Rendered

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

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Disbursements and Other Related Charges Incurred on Your Behalf

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

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Summary of Disbursements and Other Related Charges Incurred on Your Behalf

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