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Counsel for Debtor and Debtor in Possession

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

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

**MOTION FOR AUTHORITY TO DISBURSE FUNDS PAID TO THE
DEBTOR PURSUANT TO THE CERTAIN INSURER SETTLEMENT
AGREEMENT TO PAY APPROVED INTERIM FEES AND EXPENSES**

Hopeman Brothers, Inc., the debtor and debtor in possession in the above-captioned chapter 11 case (the “Debtor”), respectfully represents as follows in support of this motion (the “Motion”):

RELIEF REQUESTED¹

1. The Debtor hereby seeks entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), authorizing the Debtor to disburse funds paid to the Debtor and currently held in a segregated Debtor-in-Possession bank account, pursuant to the Certain Settling Insurers Settlement Approval Order, to pay the previously approved but unpaid professional fees and expenses set forth on Exhibit 1 to the Proposed Order. In addition, the Court

¹ Capitalized terms used but not otherwise defined in the “Relief Requested” section shall have the meanings set forth below.



should authorize the Debtor to pay from the segregated account all additional amounts that come due to professionals in accordance with the Court's Interim Compensation Procedures Order.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Standing Order of Reference from the United States District Court for the Eastern District of Virginia*, dated August 15, 1984. This is a core proceeding pursuant to 28 U.S.C. § 157, and the Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 105(a) and 363(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”).

BACKGROUND

4. On June 30, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in this Court commencing this chapter 11 case. The Debtor continues to manage its business as a debtor in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.²

A. Approved Interim Professional Fees and Expenses

5. This Court has entered orders approving the Debtor's retention of the following professionals (the “Debtor's Retained Professionals”) to assist the Debtor in carrying out its duties during this chapter 11 case:

- Hunton Andrews Kurth, LLP, as Debtor's Counsel;
- Stout Risius Ross, LLC, as financial advisor to Debtor;

² Additional information regarding the Debtor and the circumstances leading to the commencement of this chapter 11 case is set forth in detail in the *Declaration of Christopher Lascell in Support of Chapter 11 Petition and First Day Pleadings of Hopeman Brothers, Inc.* [Docket No. 8] (the “First Day Declaration”), which is fully incorporated herein by reference.

- Blank Rome, LLP, as Debtor’s special insurance counsel;
- Courington, Kiefer, Sommers, Marullo & Matherne, L.L.C., as Debtor’s special litigation counsel;³ and
- Kutak Rock LLP, as Debtor’s special conflicts counsel.

See Docket Nos. 163, 164, 165, 187, and 509.

6. On July 22, 2024, the Office of the United States Trustee appointed an official committee of unsecured creditors [Docket No. 69] (the “Committee”).

7. This Court has entered orders approving the Committee’s retention of the following professionals (the “Committee’s Retained Professionals”) to assist the Committee in carrying out its duties during this chapter 11 case:

- Caplin & Drysdale, Chartered, as Committee’s counsel;
- Morgan, Lewis & Bockius LLP, as Committee’s special insurance counsel;
- FTI Consulting, as financial advisor to the Committee; and
- NERA Economic Consulting, Inc., as Committee’s insurance allocation expert

See Docket Nos. 202, 269, 270, and 416.

8. On May 14, 2025, this Court entered its order appointing Marla Rosoff Eskin, Esq. of Cambell & Levine, LLC, to serve as the legal representative (the “Future Claimants’ Representative”) for purposes of protecting the rights of persons who might subsequently assert asbestos-related demands against the Debtor.

9. This Court has entered orders approving the Future Claimants’ Representative’s retention of the following professionals (the “Future Claimants’ Representative’s Retained”

³ With the consent and approval of the Debtor, Courington, Kiefer, Sommers, Marullo & Matherne, L.L.C. withdrew as the Debtor’s special litigation counsel effective as of May 26, 2025. *See* Docket No. 849.

Professionals”; collectively with the Debtor’s Retained Professionals and Committee’s Retained Professionals, the “Retained Professionals”) to assist her in carrying out her duties during this chapter 11 case:

- Campbell & Levine, LLC, as counsel to the Future Claimants’ Representative; and
- Reaves PLLC, as local counsel to the Future Claimants’ Representative.

See Docket Nos. 995 and 1000.

10. This Court entered its *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* [Docket No. 162] (“Interim Compensation Procedures Order”). The Interim Compensation Procedures Order sets forth procedures pursuant to which Retained Professionals submit monthly fee statements, interim applications and final applications for the allowance and payment of fees and expense incurred as part of their retention. As set forth in the motion seeking entry of the Interim Compensation Procedures Order, the compensation procedures are necessary to, among other things, ensure that Retained Professionals are fairly and timely compensated for their services in this case and are not forced to bear undue financial burden or risk caused by delays in payment. See Docket No. 73, ¶ 15 (citations omitted).⁴

11. As set forth on Exhibit 1 to the Proposed Order and in accordance with the Interim Compensation Procedures Order, this Court has entered orders approving interim fee applications

⁴ The Interim Compensation Procedures Order further provides, in relevant part, that “[n]either (i) the payment of . . . any interim compensation and reimbursement to a Retained Professional nor (ii) the filing of, or failure to file, an Objection will bind any party in interest or the Court with respect to the final allowance of any compensation of fees for services rendered or reimbursement of expenses incurred by a Retained Professional.” See Docket No. 162, ¶ 2(j) (citations omitted). In compliance with the Interim Compensation Procedures Order, the Proposed Order includes similar language.

for Retained Professionals, on an interim basis, that the Debtor has not yet paid. The approved fees and expenses total \$7,691,830.99 (the “Approved and Unpaid Fees and Expenses”).

12. Pursuant to the Interim Compensation Procedures Order, the Debtor is authorized, among other things, to promptly pay the Approved and Unpaid Fees and Expenses to the Retained Professionals following allowance by this Court. *See* Docket No. 162, ¶ 2(f).

13. The Debtor, however, has not had the wherewithal to pay the Approved and Unpaid Fees and Expenses until it received the anticipated Certain Settling Insurers Settlement Payment (defined below).

B. Certain Settling Insurers Settlement Payment

14. On July 10, 2024, the Debtor filed the *Motion of the Debtor for Entry of an Order (I) Approving the Settlement Agreement and Release Between the Debtor and Certain Settling Insurers; (II) Approving the Sale of Certain Insurance Policies; (III) Issuing an Injunction Pursuant to the Sale of Certain Insurance Policies; and (IV) Granting Related Relief* [Docket No. 53] (the “Certain Settling Insurers Motion”), asking this Court to approve the *Settlement Agreement and Release* (the “Settlement Agreement”), annexed as Exhibit A to the Certain Settling Insurers Motion, between the Debtor and the Certain Settling Insurers⁵ that monetizes the policies issued to the Debtor by the Certain Settling Insurers in the aggregate amount of \$18,395,011 (the “Certain Settling Insurers Settlement Payment”).

15. As set forth in section 2.2 of the Settlement Agreement, the Certain Settling Insurers Settlement Payment is to be used and disbursed “for the resolution of Asbestos Claims asserted

⁵ “Certain Settling Insurers” means, collectively, Continental Casualty Company, Fidelity & Casualty Company, Lexington Insurance Company, Granite State Insurance Company, the Insurance Company of the State of Pennsylvania, National Union Fire Insurance Company of Pittsburgh, PA, and General Reinsurance Corporation.

against Hopeman, for administrative costs in the Bankruptcy Case, or as otherwise authorized by the Bankruptcy Code and Bankruptcy Rules or by Bankruptcy Court order.”

16. On December 19, 2024, this Court entered its Order approving the Certain Settling Insurers Motion [Docket No. 442] (the “Certain Settling Insurers Settlement Approval Order”). Paragraph 14 of the Certain Settling Insurers Settlement Approval Order provides that “[t]he Debtor shall hold all funds paid to it under this Order in a segregated Debtor-in-Possession bank account and may only disburse funds from that account upon further Order of the Court.”

17. In accordance with the Certain Settling Insurers Settlement Approval Order, the Debtor opened Citizens Bank Account No. 2363 (the “Segregated Account”) to hold the Certain Settling Insurers Settlement Payment upon its receipt by the Debtor.

18. On July 10, 2025, the full amount of the Certain Settling Insurers Settlement Payment was received by the Debtor and is being held in the Segregated Account.

BASIS FOR RELIEF

19. Section 363(b)(1) of the Bankruptcy Code provides, in relevant part, that debtors “after notice and a hearing, may use, sell or lease, other than in the ordinary course of business, property of the estate.” 11 U.S.C. § 363(b)(1). “Section 363(b) gives the court broad flexibility in tailoring its orders to meet a wide variety of circumstances.” *In re Ionosphere Clubs, Inc.*, 98 B.R. 174, 175 (Bankr. S.D.N.Y. 1989); *see also In re Montgomery Ward Holding Corp.*, 242 B.R. 147, 155 (D. Del. 1999) (“Section 363(b) should be interpreted liberally to provide a bankruptcy judge with ‘substantial freedom to tailor his orders to meet differing circumstances’ and to avoid ‘shackling the judge with unnecessarily rigid rules.’”) (citations omitted). A court may authorize a debtor to use estate property upon a finding that such use is supported by sound business reasons. *See, e.g., In re On-Site Sourcing, Inc.*, 412 B.R. 817, 823 (Bankr. E.D. Va. 2009) (“The rule we

adopt requires that a judge determining a § 363(b) application expressly find from the evidence presented before him at the hearing a good business reason to grant such an application.”) (quoting *In re Lionel Corp.*, 722 F.2d 1063, 1070–71 (2d Cir. 1983)); see also *In re Johns-Manville Corp.*, 60 B.R. 612, 616 (Bankr. S.D.N.Y. 1986). Once a debtor articulates a reasonable basis for its business decisions, “courts will generally not entertain objections to the debtor’s conduct.” *Id.* There is a presumption that “when making business decisions, the directors of a corporation act on an informed basis, in good faith, and in the honest belief that the action taken was in the best interests of the estate.” *Poth v. Russey*, 281 F.Supp. 2d 814, 826 (E.D. Va. 2003) (citing *Dellastations v. Williams*, 242 F.3d 191, 195–96 (4th Cir. 2001); see also *In re Integrated Res., Inc.*, 147 B.R. 650, 656 (S.D.N.Y. 1992) (quoting *Smith v. Van Gordom*, 488 A.2d 858, 872 (Del. 1985)).

20. When applying the “business judgment” standard, courts show great deference to a debtor’s business decisions. See, e.g., *Lubrizol Enterprises, Inc. v. Richmond Metal Finishers, Inc.*, 756 F.2d 1043, 1047 (4th Cir. 1985) (stating that a debtor’s business judgment must “be accepted by courts unless it is shown that the bankrupt’s decision was one taken in bad faith or in gross abuse of the bankrupt’s retained business discretion”). Hence, if a transaction satisfies the business judgment rule, it should be approved pursuant to section 363(b) of the Bankruptcy Code.

21. Moreover, section 105 of the Bankruptcy Code provides that “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a).

22. Here, in accordance with the Certain Settling Insurers Settlement Order, the funds from the Certain Settling Insurers Settlement Payment are being held in the Segregated Account and may only be disbursed upon further Order of this Court. The Debtor submits that authorizing

the Debtor to disburse funds held in the Segregated Account to pay the Approved and Unpaid Fees and Expenses to the Retained Professionals represents a sound exercise of its business judgment. Each of the Approved and Unpaid Fees and Expenses has been approved by Order of this Court. The Debtor also is authorized by the Interim Compensation Procedures Order to promptly pay the Approved and Unpaid Fees and Expenses to the Retained Professionals, and is required by the Settlement Agreement to use the Certain Settling Insurers Settlement Payment to, among other things, pay administrative costs in this bankruptcy case.

23. Importantly, there are no secured creditors of the Debtor's estate. As such, the Approved and Unpaid Fees, and any fees and expense allowed under the Interim Compensation Procedures Order going forward, are the highest priority claims entitled to payment against the Debtor.

24. Accordingly, the Debtor submits that authorizing the Debtor to disburse funds from the Segregated Account to comply with its obligations to pay the Approved and Unpaid Fees and Expenses is supported by sound business reasons.

NOTICE

25. Notice of this Motion will be given pursuant to Local Rule 1075-1 and the procedures set forth in Article II of the "Procedures for Complex Cases in the Eastern District of Virginia." The Debtor submits that, in light of the nature of the relief requested, no other or further noticed need be given.

WHEREAS, the Debtor requests that the Court enter the Proposed Order granting the relief sought in the Motion and such other relief as this Court determines just and proper.

Dated: August 7, 2025
Richmond, Virginia

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

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Counsel for the Debtor and Debtor in Possession

Exhibit A
Proposed Order

HUNTON ANDREWS KURTH LLP

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Counsel for Debtor and Debtor in Possession

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

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: **Chapter 11**
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: **Case No. 24-32428 (KLP)**
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**ORDER AUTHORIZING THE DEBTOR TO DISBURSE FUNDS
PAID TO THE DEBTOR PURSUANT TO THE CERTAIN INSURER
SETTLEMENT AGREEMENT TO PAY APPROVED INTERIM
PROFESSIONAL FEES AND EXPENSES**

Upon the motion (the “Motion”)¹ of the above-captioned debtor in the above-captioned chapter 11 case (the “Debtor”) for entry of an order (this “Order”) authorizing the Debtor to disburse funds paid to the Debtor and held in the Segregated Account, pursuant to the Certain Settling Insurers Settlement Approval Order, to pay the Approved and Unpaid Fees and Expenses to the applicable Retained Professional; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334 and the *Standing Order of Reference from the United States District Court for the Eastern District of Virginia*, dated August 15, 1984; and the Court having found that this is a core proceeding pursuant to 28 U.S.C.

¹ Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

§ 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Debtor and its estate, creditors, and other parties in interest; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and the Court having determined that there is a sound business reason for the relief granted in this Order, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The relief requested in the Motion is hereby granted.
2. The Debtor is authorized to disburse funds held in the Segregated Account to pay the Approved and Unpaid Fees and Expenses set forth on Exhibit 1 attached hereto to the applicable Retained Professional.
3. In addition, the Debtor is authorized to disburse funds held in the Segregated Account to pay all additional fees and expenses that are approved in accordance with the Interim Compensation Procedures Order pursuant to monthly fee statements, interim fee applications, or final fee applications, as the case may be.
4. In compliance with the Interim Compensation Procedures Order, neither (i) the payment of the Approved and Unpaid Fees and Expenses to the Retained Professionals pursuant to this Order nor (ii) the failure to file an objection to such payment will bind any party in interest with respect to the final allowance of any compensation of fees for services rendered or reimbursement of expenses incurred by a Retained Professional.

5. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

6. The Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Dated: _____, 2025
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

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

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

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

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

Exhibit 1
Approved Interim Fees and Expenses

Professional	Order Approving Interim Fee Application(s)	Amount of Approved Interim Fees and Expenses	Amount of Approved and Unpaid Fees and Expenses
Hunton Andrews Kurth LLP	(i) Order Granting First Interim Application of Hunton Andrews Kurth LLP, Counsel for the Debtor and Debtor in Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from June 30, 2024 Through and Including August 31, 2024 [Doc. No. 333]	(i) \$845,981.98	(i) \$0.00
	(ii) Order Granting Second Interim Application of Hunton Andrews Kurth LLP, Counsel for the Debtor and Debtor in Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from September 1, 2024 Through and Including November 30, 2024 [Doc. No. 563]	(ii) \$1,542,273.67	(ii) \$1,542,273.67
	(iii) Order Granting Third Interim Application of Hunton Andrews Kurth LLP, Counsel for the Debtor and Debtor in Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from December 1, 2024 Through and Including February 28, 2025 [Doc. No. 788]	(iii) \$957,270.21	(iii) \$957,270.21
Total Amount of Approved and Unpaid Fees and Expenses for Hunton Andrews Kurth LLP			\$2,499,543.88

Professional	Order Approving Interim Fee Application(s)	Amount of Approved Interim Fees and Expenses	Amount of Approved and Unpaid Fees and Expenses
Courington, Kiefer, Sommers LLP	(i) Order Granting First Interim Application of Courington, Kiefer, Sommers LLP, as Special Asbestos Counsel for the Debtor, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from June 30, 2024 Through and Including August 31, 2024 [Doc. No. 335]	(i) \$4,078.20	(i) \$0.00
	(ii) Order Granting Second Interim Application of Courington, Kiefer, Sommers LLP, as Special Asbestos Counsel for the Debtor, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from September 1, 2024 Through and Including November 30, 2024 [Doc. No. 560]	(ii) \$9,647.00	(ii) \$9,647.00
	(iii) Order Granting Third Interim Application of Courington, Kiefer, Sommers LLP, as Special Asbestos Counsel for the Debtor, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from December 1, 2024 Through and Including February 28, 2025 [Doc. No. 758]	(iii) \$18,467.77	(iii) \$18,467.77
Total Amount of Approved and Unpaid Fees and Expenses for Courington, Kiefer, Sommers LLP			\$28,114.77

Professional	Order Approving Interim Fee Application(s)	Amount of Approved Interim Fees and Expenses	Amount of Approved and Unpaid Fees and Expenses
Blank Rome LLP	(i) Order Granting First Interim Application of Blank Rome LLP, as Special Insurance Counsel for Debtor and Debtor in Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from June 30, 2024 Through and Including August 31, 2024 [Doc. No. 334]	(i) \$34,292.35	(i) \$0.00
	(ii) Order Granting Second Interim Application of Blank Rome LLP, as Special Insurance Counsel for Debtor and Debtor in Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from September 1, 2024 Through and Including November 30, 2024 [Doc. No. 559]	(ii) \$65,102.85	(ii) \$65,102.85
	(iii) Order Granting Third Interim Application of Blank Rome LLP, as Special Insurance Counsel for Debtor and Debtor in Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from December 1, 2024 Through and Including February 28, 2025 [Doc. No. 786]	(iii) \$30,845.70	(iii) \$30,845.70
Total Amount of Approved and Unpaid Fees and Expenses for Blank Rome LLP			\$95,948.55

Professional	Order Approving Interim Fee Application(s)	Amount of Approved Interim Fees and Expenses	Amount of Approved and Unpaid Fees and Expenses
Stout Risius Ross, LLC	(i) Order Granting First Interim Application of Stout Risius Ross, LLC, as Financial Advisor to the Debtor, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred During the Period June 30, 2024 Through and Including August 31, 2024 [Doc. No. 336]	(i) \$57,389.00	(i) \$0.00
	(ii) Order Granting Second Interim Application of Stout Risius Ross, LLC, as Financial Advisor to the Debtor, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred During the Period September 1, 2024 Through and Including November 30, 2024 [Doc. No. 562]	(ii) \$363,515.89	(ii) \$363,515.89
	(iii) Order Granting Third Interim Application of Stout Risius Ross, LLC, as Financial Advisor to the Debtor, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred During the Period December 1, 2024 Through and Including February 28, 2025 [Doc. No. 787]	(iii) \$111,245.26	(iii) \$111,245.26
Total Amount of Approved and Unpaid Fees and Expenses for Stout Risius Ross, LLC			\$474,761.15

Professional	Order Approving Interim Fee Application(s)	Amount of Approved Interim Fees and Expenses	Amount of Approved and Unpaid Fees and Expenses
Kutak Rock LLP	(i) Order Granting First Interim Application of Kutak Rock LLP as Special Conflicts Counsel for the Debtor and Debtor-in-Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2025 Through and Including March 31, 2025 [Doc. No. 1028]	(i) \$112,768.55	(i) \$112,768.55
Total Amount of Approved and Unpaid Fees and Expenses for Kutak Rock LLP			\$112,768.55

rofessional	Order Approving Interim Fee Application(s)	Amount of Approved Interim Fees and Expenses	Amount of Approved and Unpaid Fees and Expenses
Morgan, Lewis & Bockius LLP	(i) Order Granting the First Interim Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of June 30, 2024 Through and Including August 31, 2024 [Doc. No. 357]	(i) \$230,300.00	(i) \$0.00
	(ii) Order Granting the Second Interim Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of September 1, 2024 Through and Including November 30, 2024 [Doc. No. 558]	(ii) \$985,965.23	(ii) \$985,965.23
	(iii) Order Granting the Third Interim Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of December 1, 2024 Through and Including February 28, 2025 [Doc. No. 823]	(iii) \$340,586.59	(iii) \$340,586.59
Total Amount of Approved and Unpaid Fees and Expenses for Morgan, Lewis & Bockius LLP			\$1,326,551.82

Professional	Order Approving Interim Fee Application(s)	Amount of Approved Interim Fees and Expenses	Amount of Approved and Unpaid Fees and Expenses
FTI Consulting, Inc.	(i) Order Granting First Interim Application of FTI Consulting, Inc. for Allowance of Compensation and Reimbursement of Expenses Incurred for the Period from August 27, 2024, Through November 30, 2024 [Doc. No. 565]	(i) \$836,747.85	(i) \$836,747.85
	(ii) Order Granting Second Interim Application of FTI Consulting, Inc. for Allowance of Compensation and Reimbursement of Expenses Incurred for the Period from December 1, 2024, Through February 28, 2025 [Doc. No. 822]	(ii) \$318,595.84	(ii) \$318,595.84
Total Amount of Approved and Unpaid Fees and Expenses for FTI Consulting, Inc.			\$1,155,343.69

Professional	Order Approving Interim Fee Application(s)	Amount of Approved Interim Fees and Expenses	Amount of Approved and Unpaid Fees and Expenses
Caplin & Drysdale	(i) Order Granting First Interim Application of Caplin & Drysdale, Chartered for Allowance of Compensation and Reimbursement of Expenses Incurred for the Period from July 22, 2024 Through and Including August 31, 2024 [Doc. No. 360]	(i) \$574,488.98	(i) \$0.00
	(ii) Order Granting Second Interim Application of Caplin & Drysdale, Chartered for Allowance of Compensation and Reimbursement of Expenses Incurred for the Period from September 1, 2024 Through and Including November 30, 2024 [Doc. No. 564]	(ii) \$1,365,249.77	(ii) \$1,365,249.77
	(iii) Order Granting Third Interim Application of Caplin & Drysdale, Chartered for Allowance of Compensation and Reimbursement of Expenses Incurred for the Period from December 1, 2024 Through and Including February 28, 2025 [Doc. No. 824]	(iii) \$633,548.81	(iii) \$633,548.81
Total Amount of Approved and Unpaid Fees and Expenses for Caplin & Drysdale			\$1,998,798.58

Total Amount of Approved and Unpaid Fees and Expenses	\$7,691,830.99
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