

**HUNTON ANDREWS KURTH LLP**

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**HUNTON ANDREWS KURTH LLP**

Tyler P. Brown (VSB No. 28072)  
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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)**  
:  
:  
:  
:

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

Name of Applicant:	Hunton Andrews Kurth LLP
Name of Client:	Hopeman Brothers, Inc. Debtor and Debtor in Possession
Date of retention order entered:	September 9, 2024, effective as of June 30, 2024 [Docket No. 163]
Time Period Covered:	June 1, 2025 through June 30, 2025
Total Fees Requested:	\$536,704.80 (80% of \$670,881.00)
Total Expenses Requested:	\$8,165.03
Type of Fee Statement:	Monthly <sup>1</sup>

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



Pursuant to sections 330, and 331 of title 11 of the United States Code, (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Bankruptcy Rules”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* entered September 9, 2024 [Docket No. 162] (the “Interim Compensation Order”), the law firm of Hunton Andrews Kurth LLP (“Hunton”), counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), hereby submits this monthly fee statement (the “Monthly Fee Statement”) for the allowance of compensation for the reasonable and necessary legal services rendered by Hunton for the period from June 1, 2025 through and including June 30, 2025 (the “Fee Period”) and reimbursement of the actual and necessary expenses that Hunton incurred during the Fee Period. By this Monthly Fee Statement, Hunton seeks allowance of compensation for services rendered in the amount of \$670,881.00 and payment in the amount of \$536,704.80 (which equals 80% of the compensation sought herein). Hunton also seeks allowance and reimbursement of actual and necessary expenses in the amount of \$8,165.03.

**Itemization of Services Rendered and Disbursements Incurred**

1. In support of this Monthly Fee Statement, Hunton has attached the following:
  - **Exhibit A** is a summary schedule of hours and fees covered by this Monthly Fee Statement, categorized by project code.
  - **Exhibit B** is a summary schedule of the time expended by all Hunton professionals and paraprofessionals engaged in the representation of the Debtor during the Fee Period.
  - **Exhibit C** is a summary of the expenses incurred by Hunton during the Fee Period.
  - **Exhibit D** is a detailed invoice for the hours expended and fees incurred by Hunton professionals and paraprofessionals during the Fee Period.

**Representations**

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

**Notice**

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

WHEREFORE, Hunton respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$544,869.83, consisting of (i) \$536,704.80, which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Hunton during the Fee Period, and (ii) \$8,165.03 for actual and necessary costs and expenses.

*[Remainder of Page Intentionally Left Blank]*

Dated: August 8, 2025  
Richmond, Virginia

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

Tyler P. Brown (VSB No. 28072)

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

**HUNTON ANDREWS KURTH LLP**

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951 East Byrd Street

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- and -

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

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Houston, TX 77002

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Facsimile: (713) 220-4285

Email: josephrovira@HuntonAK.com

crankin@HuntonAK.com

*Counsel for the Debtor and Debtor in Possession*

**EXHIBIT A**

**Statement of Fees by Subject Matter during the Fee Period**

<b>Matter Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
B110	Case Administration	12.4	\$7,651.50
B160	Fee / Employment Applications	3.8	\$3,923.50
B190	Other Contested Matters (excluding assumption / rejection motions)	358.0	\$340,806.00
B210	Business Operations	1.9	\$2,070.00
B310	Claims Administration and Objections	11.1	\$12,523.50
B320	Plan and Disclosure Statement (including Business Plan)	262.9	\$303,906.50
<b>Total</b>		<b>650.1</b>	<b>\$670,881.00</b>

**EXHIBIT B**

**Professionals Rendering Services during the Fee Period**

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

Professional	Position	Year Admitted	Expertise	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. P. Brown	Partner	1987	Bankruptcy	\$1,485	169.3	\$251,410.50
J. W. Harbour	Partner	2001	Bankruptcy	\$1,430	0.6	\$858.00
J. P. Rovira	Partner	2008	Bankruptcy	\$1,100	29.6	\$32,560.00
H. P. Long III	Counsel	2007	Bankruptcy	\$1,025	225.6	\$231,240.00
P. M. Guffy	Associate	2016	Bankruptcy	\$995	15.0	\$14,925.00
C. A. Rankin	Associate	2018	Bankruptcy	\$895	31.1	\$27,834.50
B. R. Bell	Associate	2021	Bankruptcy	\$795	45.8	\$36,411.00
N. S. Monico	Associate	2023	Bankruptcy	\$695	57.5	\$39,962.50
K. T. Bailey	Associate	2023	Bankruptcy	\$690	9.5	\$6,555.00
R. Rubin	Associate	2025	Bankruptcy	\$695	7.1	\$4,934.50
<b>Totals</b>					<b>591.1</b>	<b>\$646,691.00</b>

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

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. L. Canada	Paralegal	Bankruptcy	\$410	59.0	\$24,190.00
<b>Totals</b>				<b>59.0</b>	<b>\$24,190.00</b>

**EXHIBIT C**

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

Type	Expenses
Online Research	\$2,548.18
Local Travel	\$30.00
Trial Transcripts	\$328.70
Litigation Support Vendors	\$5,258.15
<b>TOTAL EXPENSES:</b>	<b>\$8,165.03</b>

**EXHIBIT D**

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



# HUNTON

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

TEL 713 • 220 • 4200

EIN 54-0572269

## INVOICE SUMMARY

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

FILE NUMBER: 040312.0000007  
INVOICE NUMBER: 131826843  
DATE: 07/31/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

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

## CURRENT INVOICE SUMMARY:

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

Current Fees: \$ 670,881.00  
Current Charges: 8,165.03

**CURRENT INVOICE AMOUNT DUE: \$ 679,046.03**

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

Information with Payment: File: 040312.0000007, Inv: 131826843, Date: 07/31/2025

#### To Pay by Mail:

HUNTON ANDREWS KURTH LLP  
PO BOX 405759  
ATLANTA, GA 30384-5759

#### To Pay by ACH:

Company Name: Hunton Andrews Kurth LLP  
Routing Number: 021052053  
Account Number: 72561654

#### To Pay by Wire Transfer:

Bank: Bank of America, Richmond, VA  
Account Name: Hunton Andrews Kurth LLP  
Account Number: 334003060563  
ABA Transit: 026009593; Swift Code: BOFAUS3N

# HUNTON

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

TEL 713 • 220 • 4200

EIN 54-0572269

## INVOICE SUMMARY-REMITTANCE PAGE

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

FILE NUMBER: 040312.0000007  
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Current Charges: 8,165.03

**CURRENT INVOICE AMOUNT DUE: \$ 679,046.03**

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

Information with Payment: File: 040312.0000007, Inv: 131826843, Date: 07/31/2025

#### To Pay by Mail:

HUNTON ANDREWS KURTH LLP  
PO BOX 405759  
ATLANTA, GA 30384-5759

#### To Pay by ACH:

Company Name: Hunton Andrews Kurth LLP  
Routing Number: 021052053  
Account Number: 72561654

#### To Pay by Wire Transfer:

Bank: Bank of America, Richmond, VA  
Account Name: Hunton Andrews Kurth LLP  
Account Number: 334003060563  
ABA Transit: 026009593; Swift Code: BOFAUS3N

# HUNTON

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

TEL 713 • 220 • 4200

EIN 54-0572269

## INVOICE DETAIL

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

FILE NUMBER: 040312.0000007  
INVOICE NUMBER: 131826843  
DATE: 07/31/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

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

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

DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/02/2025	H P LONG, III	B110	Analyze certificates of service and communications with Verita regarding the same	0.40	410.00
06/03/2025	T L CANADA	B110	Electronically file certificates of service for doc. nos. 749, 751, 765, 768, 769, 783, 786, 787, 788, and AP 20	0.50	205.00
06/05/2025	T L CANADA	B110	Electronically file Affidavit of Publication of the Notice of Combined Hearing for Approval of Disclosure Statement and Confirmation of Plan	0.10	41.00
06/09/2025	H P LONG, III	B110	Analyze certificates of service and communications with Verita regarding the same	0.20	205.00
06/09/2025	T L CANADA	B110	Electronically file certificate of service for doc. nos. 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814	0.30	123.00
06/10/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/10/2025	T L CANADA	B110	Electronically file certificates of service for doc. nos. 839, 849	0.20	82.00
06/11/2025	T L CANADA	B110	Analysis of docket and work on Proposed Agenda for June 18th omnibus hearing	1.70	697.00
06/11/2025	T L CANADA	B110	Electronically file certificate of service of doc. no. 853	0.10	41.00
06/11/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
06/12/2025	H P LONG, III	B110	Analyze and comment on agenda for June 18 hearing	1.10	1,127.50
06/12/2025	T L CANADA	B110	Continue work on Proposed Agenda for June 18th omnibus hearing	1.20	492.00
06/16/2025	T P BROWN	B110	Review and revise agenda for 6/18 hearing	0.10	148.50
06/16/2025	H P LONG, III	B110	Analyze and work on agenda for June 18 hearing	0.60	615.00
06/16/2025	T L CANADA	B110	Work on Proposed Agenda for June 18th hearing	0.40	164.00
06/17/2025	H P LONG, III	B110	Analyze certificate of service and communications with counsel to Liberty regarding the same	0.20	205.00
06/17/2025	H P LONG, III	B110	Analyze and finalize agenda for June 18 hearing	0.60	615.00
06/17/2025	T L CANADA	B110	Finalize Proposed Agenda for June 18th Hearing and electronically file same	0.30	123.00
06/18/2025	H P LONG, III	B110	Analyze certificates of service and communications with Verita regarding the same	0.20	205.00
06/18/2025	T L CANADA	B110	Electronically file certificates of service on doc. nos. 876, 878, 879, 880, and AP doc. no. 23	0.30	123.00
06/23/2025	T L CANADA	B110	Communications with Clerk regarding electronic device permission form for June 24th hearing	0.20	82.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/24/2025	T L CANADA	B110	Prepare hearing materials for June 24th hearing	2.60	1,066.00
06/24/2025	T L CANADA	B110	Electronically file certificate of service for doc. nos. 866, 867	0.10	41.00
06/25/2025	H P LONG, III	B110	Analyze certificates of service and communications with Verita regarding the same	0.30	307.50
06/26/2025	T L CANADA	B110	Electronically file certificates of service for doc. nos. 886, 900, 905, 907, 910, 921	0.30	123.00
			<b>TOTAL B110</b>	<b>12.40</b>	
06/02/2025	T L CANADA	B160	Communication with UST regarding Blank Rome February 2025 LEDES file	0.10	41.00
06/03/2025	T P BROWN	B160	Review supplemental filings by FCR's counsel	0.10	148.50
06/05/2025	T P BROWN	B160	Emails with committee counsel re Courington firm notice to be filed	0.10	148.50
06/05/2025	T P BROWN	B160	Revise proposed notice and related conference with T.Long re UST and court calls on same	0.20	297.00
06/05/2025	H P LONG, III	B160	Finalize notice of withdrawal for Courington (.30), and communications with K. Courington regarding the same (.30)	0.60	615.00
06/06/2025	T P BROWN	B160	Email with C.Rankin and emails with T.Long re fee app period	0.10	148.50
06/10/2025	T P BROWN	B160	Telephone call with K.Courington and emails with K.Courington and T.Long re withdrawing as counsel.	0.30	445.50
06/12/2025	T P BROWN	B160	Emails with C.Rankin re Kutak fee app hearing and interim period	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/12/2025	C A RANKIN	B160	Emails with T. Brown regarding Kutak First Interim Fee Application (.1); review Kutak First Interim Fee Application and notice of filing same (.5) and emails with P. Barrett regarding same (.1).	0.70	626.50
06/16/2025	C A RANKIN	B160	Analyze upcoming filing deadline for debtors' professionals' next interim fee applications and considerations regarding preparing and filing same (.3) and draft email to J. Rovira regarding same (.1).	0.40	358.00
06/17/2025	C A RANKIN	B160	Analyze email from UST's office regarding request for Stout's LEDES files and communications with T. Canada and M. McMahon at UST's office regarding same (.4) and draft email summarizing discussion regarding same to M. McMahon (.1).	0.50	447.50
06/17/2025	T L CANADA	B160	Communications with C. Rankin and M. McMahon of the UST office regarding LEDES files	0.20	82.00
06/18/2025	C A RANKIN	B160	Email T. Brown and T. Long regarding considerations in preparing next fee application (.1); emails with T. Canada, Blank Rome, CKSMM, and Stout regarding timing for next interim fee application (.2).	0.30	268.50
06/18/2025	T P BROWN	B160	Emails with C. Rankin re interim fee app	0.10	148.50
			<b>TOTAL B160</b>	<b>3.80</b>	
06/01/2025	K T BAILEY	B190	Perform document review related to Liberty discovery requests.	6.00	4,140.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/01/2025	C A RANKIN	B190	Conduct document review regarding Liberty discovery request (1.8) and address open items and questions regarding same (.3).	2.10	1,879.50
06/01/2025	R RUBIN	B190	Review documents for request for production from Liberty Mutual, marking privilege and areas for redaction	2.30	1,598.50
06/01/2025	H P LONG, III	B190	Analyze and work on second level review of documents responsive to Chubb requests	0.80	820.00
06/01/2025	H P LONG, III	B190	Analyze documents potentially responsive to Liberty's document requests	4.40	4,510.00
06/01/2025	N S MONICO	B190	Document review regarding Chubb production request	0.70	486.50
06/01/2025	T P BROWN	B190	Work on responses and objections to LMIC discovery requests and related email to T.Long	0.80	1,188.00
06/02/2025	T L CANADA	B190	Communications with Cognicion and T. Long regarding Chubb and Liberty production	0.50	205.00
06/02/2025	T P BROWN	B190	Review motion in AP of LMIC and consider applicable rules and strategy for responding	0.60	891.00
06/02/2025	T P BROWN	B190	Conferences with T.Long re discovery responses and objections to LMIC requests	0.40	594.00
06/02/2025	T P BROWN	B190	Conference with T.Long re document review for Chubb's discovery requests	0.30	445.50
06/02/2025	T P BROWN	B190	Work on open items list for pending litigation	0.40	594.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/02/2025	C A RANKIN	B190	Continue to analyze documents for Liberty document review regarding discovery request (6.6) and address open items and questions regarding same (.2) and conference with T. Long regarding status of same (.1).	6.90	6,175.50
06/02/2025	K T BAILEY	B190	Perform document review related to Liberty discovery requests.	3.50	2,415.00
06/02/2025	R RUBIN	B190	Review documents for request for production from Liberty Mutual, marking privilege and areas for redaction	4.80	3,336.00
06/02/2025	N S MONICO	B190	Document review regarding Liberty production request	5.00	3,475.00
06/02/2025	H P LONG, III	B190	Analyze and work on second level review of documents potentially responsive to Chubb discovery	5.60	5,740.00
06/02/2025	H P LONG, III	B190	Analyze and work on responses to LMIC interrogatories	1.30	1,332.50
06/02/2025	T P BROWN	B190	Review SCS sample files related to Chubb requests and related emails with L.Smith	0.60	891.00
06/02/2025	T P BROWN	B190	Conference with T.Long re open items to be addressed in discovery, appeal and LMIC complaint	0.50	742.50
06/02/2025	T P BROWN	B190	Research re abstention motions in EDVA	0.80	1,188.00
06/02/2025	T P BROWN	B190	Consider extension motion for 3rd interim order extending stay and related strategy	0.50	742.50
06/02/2025	T P BROWN	B190	Consider counter-designations for Chubb appeal of FCR order	0.20	297.00
06/03/2025	T P BROWN	B190	Work on response to Chubb discovery issues and related email	0.40	594.00



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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/03/2025	T P BROWN	B190	Work on stipulations of fact and related emails and call with C.Lascell re same	0.70	1,039.50
06/03/2025	T P BROWN	B190	Work on strategy in response to LMIC complaint and motion	1.80	2,673.00
06/03/2025	T P BROWN	B190	Work on LMIC discovery responses and objections and review related emails with C.Lascell	0.60	891.00
06/03/2025	C A RANKIN	B190	Conduct document review regarding Liberty's discovery request (5.1) and address open items regarding same (.3).	5.40	4,833.00
06/03/2025	T L CANADA	B190	Work on production of documents for Chubb 2004 response	1.50	615.00
06/03/2025	T L CANADA	B190	Communications with Cognicion and T. Long regarding Chubb and Liberty production	0.50	205.00
06/03/2025	H P LONG, III	B190	Work on second level review of documents responsive to Liberty's requests	2.30	2,357.50
06/03/2025	H P LONG, III	B190	Finalize and serve interrogatory responses on Liberty	0.60	615.00
06/03/2025	H P LONG, III	B190	Analyze issues and strategy related to Liberty adversary proceeding	1.10	1,127.50
06/03/2025	H P LONG, III	B190	Analyze and work on privilege review for Chubb discovery	3.70	3,792.50
06/03/2025	H P LONG, III	B190	Analyze email from Chubb counsel regarding discovery and prepare and send email response to same	0.70	717.50
06/03/2025	T P BROWN	B190	Research on abstention and motion to dismiss and review related precedents from T.Long	2.20	3,267.00

HUNTON ANDREWS KURTH LLP  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/04/2025	T L CANADA	B190	Work on Designation of Appellee of Additional Items to be Included in the Record on Appeal	0.40	164.00
06/04/2025	N S MONICO	B190	Analyze posture of appeal of FCR Order (.4); prepare motion to dismiss the same (3.1)	3.50	2,432.50
06/04/2025	T L CANADA	B190	Communications with Cognicion and T. Long regarding Chubb and Liberty production	0.80	328.00
06/04/2025	T L CANADA	B190	Analysis of documents marked privileged to redact privileged information for Chubb 2004 production	5.80	2,378.00
06/04/2025	N S MONICO	B190	Second round document review regarding Liberty production request	5.60	3,892.00
06/04/2025	J W HARBOUR	B190	Analysis of issues concerning adversary proceeding and motion to withdraw and communications with counsel	0.20	286.00
06/04/2025	C A RANKIN	B190	Continue to conduct document review in response to Liberty's discovery request.	3.40	3,043.00
06/04/2025	T P BROWN	B190	Draft counter-designation of record on appeal of FCR order by Chubb insurers	0.30	445.50
06/04/2025	T P BROWN	B190	Conferences with T.Long re objection to notice improperly filed by LMIC	0.20	297.00
06/04/2025	T P BROWN	B190	Work on motion to extend third interim stay extension order	0.40	594.00
06/04/2025	T P BROWN	B190	Call with C.Lascell re stipulations of fact and re 2003 trust account	0.50	742.50
06/04/2025	T P BROWN	B190	Consider strategy re settlement of informal objection	0.20	297.00
06/04/2025	T P BROWN	B190	Research re withdrawal of reference issues	1.30	1,930.50

HUNTON ANDREWS KURTH LLP  
 CLIENT NAME: Hopeman Brothers, Inc.  
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/04/2025	T P BROWN	B190	Review samples from C.Lascell re 2003 trust documents and emails with C.Lascell re same	0.20	297.00
06/04/2025	T P BROWN	B190	Draft email to LMIC re service issues and related conference with T.Long	0.10	148.50
06/04/2025	T P BROWN	B190	Conference with J.Harbour re service issues for complaint and response strategy	0.20	297.00
06/04/2025	T P BROWN	B190	Revise proposed stipulations of fact and email to LMIC counsel re same	0.60	891.00
06/04/2025	T P BROWN	B190	Email to committee counsel re service issues	0.10	148.50
06/04/2025	T P BROWN	B190	Work on discovery responses to review additional requests to committee and debtor from Chubb	0.60	891.00
06/04/2025	T P BROWN	B190	Review revisions to motion to extend stay	0.10	148.50
06/04/2025	T P BROWN	B190	Work on outline for June 18 hearings	0.70	1,039.50
06/04/2025	H P LONG, III	B190	Prepare for and participate in call with Committee counsel and counsel to FCR to discuss issues related to discovery served by insurers	0.60	615.00
06/04/2025	H P LONG, III	B190	Analyze and prepare fourth motion for interim stay order	1.80	1,845.00
06/04/2025	H P LONG, III	B190	Analyze and work on strategy in connection with Liberty adversary proceeding	0.70	717.50
06/04/2025	H P LONG, III	B190	Analyze new interrogatories served by Chubb	0.60	615.00
06/04/2025	H P LONG, III	B190	Analyze and work on stipulation of facts to resolve objections to Liberty discovery	0.80	820.00

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06/04/2025	H P LONG, III	B190	Analyze and work on second level review of documents responsive to Liberty requests	3.40	3,485.00
06/05/2025	N S MONICO	B190	Consider how to handle Liberty declaratory judgment action with T.Brown	0.50	347.50
06/05/2025	N S MONICO	B190	Determine time for making cross designations regarding Chubb appeal of FCR order	0.30	208.50
06/05/2025	T L CANADA	B190	Communications with Cognicion and T. Long regarding Chubb and Liberty production and prepare Chubb Responsive, Non-privilege documents for Production	3.10	1,271.00
06/05/2025	T L CANADA	B190	Analysis of documents marked privilege to redact privileged information for Chubb 2004 production	4.40	1,804.00
06/05/2025	C A RANKIN	B190	Analyze Travelers' interrogatories and discovery request.	0.80	716.00
06/05/2025	T P BROWN	B190	Consider strategy re response to motion to withdraw the reference in LMIC AP and related research	2.30	3,415.50
06/05/2025	T P BROWN	B190	Telephone call with Olivia Greenberg for Mark Mintz re settling informal objections	0.20	297.00
06/05/2025	H P LONG, III	B190	Analyze and finalize responses to Liberty's discovery requests (.80), and prepare and send email to Liberty counsel with discovery response and making production of documents (.40)	1.20	1,230.00
06/05/2025	H P LONG, III	B190	Prepare and send email to Chubb counsel with discovery response and making production of documents	0.40	410.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/05/2025	H P LONG, III	B190	Analyze and work on production of documents to Chubb	2.20	2,255.00
06/05/2025	H P LONG, III	B190	Complete 2nd level and privilege review of documents responsive to Liberty's requests	4.90	5,022.50
06/05/2025	T P BROWN	B190	Review discovery requests from Travelers	0.20	297.00
06/05/2025	T P BROWN	B190	Review responses to LMIC discovery requests and related conferences with T.Long	0.40	594.00
06/05/2025	T P BROWN	B190	Emails with LMIC counsel and committee counsel re service issues and withdrawal motion and response date and strategy re same	0.80	1,188.00
06/05/2025	T P BROWN	B190	Conferences with N.Monico and emails re same on background and strategy re LMIC complaint and response strategy	0.50	742.50
06/05/2025	T P BROWN	B190	Prepare for 6/18 hearing and gather related pleadings and consider responses and filing replies	0.80	1,188.00
06/05/2025	T P BROWN	B190	Work on motion to dismiss strategy on LMIC complaint	0.70	1,039.50
06/05/2025	T P BROWN	B190	Work on response strategy for motion to withdraw the reference and review related unredacted complaint and motion and revise LMIC claim	1.40	2,079.00
06/05/2025	T P BROWN	B190	Telephone call with M.Mueller re service issue on LMIC complaint	0.10	148.50
06/05/2025	T P BROWN	B190	Review Chubb counsel's email re discovery status and related conference with T.Long re same	0.40	594.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/06/2025	N S MONICO	B190	Research precedents regarding time for filing a motion to dismiss a bankruptcy appeal regarding Chubb appeal of FCR order	0.90	625.50
06/06/2025	N S MONICO	B190	Address privilege redaction issues regarding Liberty/Chubb doc reviews	0.30	208.50
06/06/2025	T L CANADA	B190	Analysis of documents marked privilege to redact privileged information for Chubb 2004 and Liberty productions	6.50	2,665.00
06/06/2025	T L CANADA	B190	Communications with Cognicion and T. Long regarding Chubb and Liberty production and prepare Chubb Responsive, privileged documents for Production	1.50	615.00
06/06/2025	T P BROWN	B190	Emails with N.Monico and T.Long re additional designations of record on appeal	0.10	148.50
06/06/2025	T P BROWN	B190	Conference with N.Monico re strategy on FCR appeal and related emails with N.Monico	0.30	445.50
06/06/2025	T P BROWN	B190	Work on debtor discovery requests and related conference with T.Long	0.40	594.00
06/06/2025	T P BROWN	B190	Review draft privilege log and related emails with T.Long	0.30	445.50
06/06/2025	T P BROWN	B190	Work on response to motion to withdraw the reference of LMIC	0.60	891.00
06/06/2025	T P BROWN	B190	Work on responses to additional discovery requests from LMIC and review related drafts and emails from T.Long	0.70	1,039.50
06/06/2025	T P BROWN	B190	Work on email response to Chubb discovery disputes	0.20	297.00
06/06/2025	T P BROWN	B190	Work on strategy for motion to dismiss appeal	0.50	742.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/06/2025	T P BROWN	B190	Review emails to and from T.Long and Chubb on additional document production and privilege log	0.20	297.00
06/06/2025	H P LONG, III	B190	Prepare and serve discovery requests on Chubb	0.70	717.50
06/06/2025	H P LONG, III	B190	Prepare and serve discovery requests on Liberty	0.80	820.00
06/06/2025	H P LONG, III	B190	Prepare and serve discovery requests on Travelers	0.70	717.50
06/06/2025	H P LONG, III	B190	Analyze Travelers' discovery requests	0.60	615.00
06/06/2025	H P LONG, III	B190	Analyze and respond to email from P. Santelle regarding privileged documents	0.40	410.00
06/06/2025	H P LONG, III	B190	Analyze and respond to email from L. Davis regarding discovery responses	0.90	922.50
06/06/2025	C A RANKIN	B190	Analyze LMIC's motion to temporarily allow claim.	0.70	626.50
06/06/2025	H P LONG, III	B190	Analyze and prepare responses to Liberty's second interrogatories	2.80	2,870.00
06/07/2025	H P LONG, III	B190	Analyze and work on privilege review and privilege log for Chubb production	4.10	4,202.50
06/08/2025	H P LONG, III	B190	Analyze and work on privilege review and privilege log for Chubb production	3.70	3,792.50
06/09/2025	H P LONG, III	B190	Analyze and work on responses and objections to Liberty's second interrogatories (1.20), and communications with C. Lascell, R. Van Epps and K. Brinkman regarding the same (.60)	1.80	1,845.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/09/2025	T P BROWN	B190	Review K.Brinkman's comments on LMIC discovery responses and related emails with T.Long	0.10	148.50
06/09/2025	T P BROWN	B190	Emails with R.Van Epps re potential deposition and avoid dates	0.10	148.50
06/09/2025	T P BROWN	B190	Review LMIC email re discovery issues and conference with T.Long re potential responses and related strategy	0.40	594.00
06/09/2025	T P BROWN	B190	Conference with T.Long re interrogatories and document responses and related suggested revisions	0.30	445.50
06/09/2025	T L CANADA	B190	Communications with Cognicion and T. Long regarding Liberty production and prepare Liberty Responsive, privileged documents for Production and Chubb privilege log	7.20	2,952.00
06/09/2025	N S MONICO	B190	Analyze Liberty complaint and motion to withdraw reference	0.70	486.50
06/09/2025	N S MONICO	B190	Final quality control review of Liberty production regarding privilege redactions	1.10	764.50
06/09/2025	H P LONG, III	B190	Analyze final documents responsive to Liberty's requests related to its claim to prepare for Liberty production	3.60	3,690.00
06/09/2025	H P LONG, III	B190	Analyze and work on privilege review for Chubb production and supplemental production	2.40	2,460.00
06/09/2025	H P LONG, III	B190	Analyze email from counsel to Liberty regarding discovery and strategy for response to same	0.70	717.50



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06/09/2025	J P ROVIRA	B190	Attention to correspondence relating to discovery issues with insurers and review same.	1.50	1,650.00
06/10/2025	N S MONICO	B190	Final quality control review of Liberty production regarding privilege redactions	1.30	903.50
06/10/2025	T L CANADA	B190	Communications with Cognicion and T. Long regarding Liberty privilege log and supplemental Chubb production	2.30	943.00
06/10/2025	T P BROWN	B190	Revise proposed responses to Travelers and LMIC discovery requests	0.40	594.00
06/10/2025	T P BROWN	B190	Conferences with T.Long re discovery disputes and proposed strategy	0.40	594.00
06/10/2025	T P BROWN	B190	Emails and conference with T.Long re Travelers discovery responses and suggested revisions	0.20	297.00
06/10/2025	T P BROWN	B190	Revise proposed response to LMIC email on discovery issues	0.20	297.00
06/10/2025	T P BROWN	B190	Work on Chubb discovery responsive documents and privilege log	0.30	445.50
06/10/2025	T P BROWN	B190	Emails with SCS personnel re review of uploaded sample files	0.10	148.50
06/10/2025	T P BROWN	B190	Emails with R.Van Epps and C.Lascell re witness prep and depositions	0.10	148.50
06/10/2025	H P LONG, III	B190	Communications with N. Miller regarding plan discovery served on Committee (.30) and review same (.60)	0.90	922.50
06/10/2025	H P LONG, III	B190	Analyze and finalize production of redacted documents to Chubb and privilege log (1.80), and email to counsel to Chubb producing the same (.50)	2.30	2,357.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/10/2025	H P LONG, III	B190	Analyze and finalize responses and objections to Liberty's second set of interrogatories	1.10	1,127.50
06/10/2025	H P LONG, III	B190	Analyze and prepare responses and objections to Travelers requests for production	1.60	1,640.00
06/10/2025	H P LONG, III	B190	Analyze and finalize Liberty Production	2.70	2,767.50
06/10/2025	H P LONG, III	B190	Prepare response to counsel to Liberty regarding discovery	1.40	1,435.00
06/11/2025	T P BROWN	B190	Telephone call with K.Courington re LMIC request and related emails with K.Courington and T.Long	0.20	297.00
06/11/2025	T P BROWN	B190	Conference with T.Long re LMIC and Travelers discovery responses	0.30	445.50
06/11/2025	H P LONG, III	B190	Analyze and finalize responses and objections to Travelers requests for production and produce the same	1.10	1,127.50
06/11/2025	H P LONG, III	B190	Finalize and send email to counsel to Liberty regarding discovery, including making LMIC Production and supplementing Chubb Production with redacted documents and privilege log	1.60	1,640.00
06/11/2025	H P LONG, III	B190	Analyze and work on reply in support of motion to dismiss Chubb adversary proceeding	2.70	2,767.50
06/11/2025	J P ROVIRA	B190	Attention to correspondence relating to discovery requests from insurers (.8); address issues relating to strategy for upcoming confirmation and claim objection hearing (1.0).	1.80	1,980.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/11/2025	N S MONICO	B190	Prepare privilege log regarding Liberty document production	3.10	2,154.50
06/11/2025	T L CANADA	B190	Communications with Cognicion and T. Long regarding supplemental Liberty productions	1.20	492.00
06/11/2025	N S MONICO	B190	Prepare objection to Liberty motion to withdraw reference	1.90	1,320.50
06/11/2025	T P BROWN	B190	Review and revise response to LMIC re discovery disputes	0.30	445.50
06/11/2025	T P BROWN	B190	Work on discovery issues re Travelers	0.20	297.00
06/11/2025	T P BROWN	B190	Review Chubb's requests for FCR	0.10	148.50
06/12/2025	N S MONICO	B190	Prepare privilege log regarding Liberty document production	1.60	1,112.00
06/12/2025	N S MONICO	B190	Analyze Chubb objection to motion to quash SCS subpoena (.8); consider potential arguments in response (1.0); analyze plan and trust distribution procedures regarding the same (.8)	2.60	1,807.00
06/12/2025	N S MONICO	B190	Conduct research regarding various considerations regarding Chubb SCS subpoena	0.90	625.50
06/12/2025	N S MONICO	B190	Misc. clean up regarding Liberty document review	0.40	278.00
06/12/2025	N S MONICO	B190	Prepare motion to dismiss Liberty Complaint	3.00	2,085.00
06/12/2025	N S MONICO	B190	Prepare objection to Liberty motion to withdraw reference	1.60	1,112.00
06/12/2025	N S MONICO	B190	Consider cross designations regarding Chubb FCR Order appeal	0.40	278.00
06/12/2025	T L CANADA	B190	Work on Witness and Exhibit List for June 18th hearing	1.70	697.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/12/2025	T P BROWN	B190	Telephone call with Olivia Greenberg re potential settlement of informal objection to stay extension motion and plan	0.30	445.50
06/12/2025	T P BROWN	B190	Conference with T.Long re potential settlement of stay extension and plan objections	0.10	148.50
06/12/2025	T P BROWN	B190	Emails with T.Long re confidentiality agreement request from Travelers	0.10	148.50
06/12/2025	T P BROWN	B190	Conference with T.Long re witnesses and exhibits for 6/18 hearing and contacting witnesses re same	0.30	445.50
06/12/2025	T P BROWN	B190	Consider strategy re Chubb document subpoena and request for current files	0.40	594.00
06/12/2025	H P LONG, III	B190	Analyze and comment on exhibit and witness list for June 18 hearing	0.90	922.50
06/12/2025	H P LONG, III	B190	Communications with R. Van Epps and C. Lascell regarding June 18 hearing	0.40	410.00
06/12/2025	H P LONG, III	B190	Analyze and respond to request from counsel to Travelers for a confidentiality agreement, including confirming form of agreement	0.60	615.00
06/12/2025	H P LONG, III	B190	Analyze issues related to privilege log for LMIC production	0.70	717.50
06/12/2025	H P LONG, III	B190	Analyze and work on reply in support of motion to quash Chubb's subpoena on SCS	4.10	4,202.50
06/12/2025	C A RANKIN	B190	Analyze Chubb's reply to motion to quash regarding subpoena of SCS.	0.40	358.00
06/13/2025	N S MONICO	B190	Finalize cross designations regarding Chubb FCR order appeal	0.20	139.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/13/2025	N S MONICO	B190	Prepare motion to dismiss Liberty declaratory judgment action	3.40	2,363.00
06/13/2025	N S MONICO	B190	Prepare Objection to motion to withdrawal reference regarding Liberty declaratory judgment action	1.90	1,320.50
06/13/2025	N S MONICO	B190	Consider strategy regarding liberty declaratory judgment action	2.40	1,668.00
06/13/2025	T L CANADA	B190	Finalize and electronically file Designation of Appellee Hopeman Brothers, Inc. of Additional Items to be Included in the Record of Appeal	0.40	164.00
06/13/2025	T P BROWN	B190	Emails with N.Monico re designation of additional item for record on Chubb's FCR appeal	0.10	148.50
06/13/2025	T P BROWN	B190	Emails with T.Long re counter-designation of record in FCR appeal	0.10	148.50
06/13/2025	T P BROWN	B190	Emails with O.Greenberg re proposed resolution of informal objection	0.30	445.50
06/13/2025	T P BROWN	B190	Emails with J.Rovira re update on litigation	0.10	148.50
06/13/2025	T P BROWN	B190	Conference with N.Monico re motions and objection re LMIC complaint and motion	0.40	594.00
06/13/2025	T P BROWN	B190	Conference with T.Long re outstanding issues and prep of replies to motions and LMIC claim objection	0.40	594.00
06/13/2025	T P BROWN	B190	Review Chubb's response to motion to quash subpoena and consider responses to same	0.40	594.00
06/13/2025	T P BROWN	B190	Consider response and reply on motion to dismiss Chubb complaint	0.40	594.00
06/13/2025	H P LONG, III	B190	Analyze and comment on designation of record for FCR appeal	0.80	820.00

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06/13/2025	H P LONG, III	B190	Analyze responses from FCR to insurers' discovery requests	0.90	922.50
06/13/2025	H P LONG, III	B190	Analyze responses from Committee to insurers' document requests	1.20	1,230.00
06/13/2025	H P LONG, III	B190	Analyze Liberty's responses to discovery requests	0.60	615.00
06/13/2025	H P LONG, III	B190	Analyze Traveler's responses to discovery requests	0.50	512.50
06/13/2025	H P LONG, III	B190	Analyze additional discovery requests from Liberty (.50), and communications with Committee counsel regarding the same (.30)	0.80	820.00
06/13/2025	H P LONG, III	B190	Analyze and work on reply in support of motion to dismiss Chubb Adversary proceeding	1.60	1,640.00
06/13/2025	H P LONG, III	B190	Analyze and work on reply in support of motion to quash subpoena on SCS	1.80	1,845.00
06/13/2025	J P ROVIRA	B190	Review discovery responses received from insurers and address open issues related to discovery.	1.00	1,100.00
06/13/2025	C A RANKIN	B190	Review Committee's designation of additional items regarding appeal of order appointing FCR.	0.10	89.50
06/14/2025	T P BROWN	B190	Review SCS files for potential compromise and strategy on 6/18 hearing	0.40	594.00
06/14/2025	T P BROWN	B190	Review committee designation of appellate record	0.10	148.50
06/15/2025	H P LONG, III	B190	Analyze and work on responses and objections to Chubb's interrogatories	3.10	3,177.50
06/16/2025	T P BROWN	B190	Review committee's responses to similar discovery requests of insurers	0.40	594.00

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06/16/2025	T P BROWN	B190	Emails with T.Long and K.Courington re stayed case and violation	0.20	297.00
06/16/2025	T P BROWN	B190	Work on replies to motion to dismiss and motion to quash	2.40	3,564.00
06/16/2025	T P BROWN	B190	Work on discovery responses to Chubb	0.70	1,039.50
06/16/2025	J P ROVIRA	B190	Prepare for and participate in witness preparation session for C. Lascell.	1.80	1,980.00
06/16/2025	H P LONG, III	B190	Prepare for and participate in call to prepare for witness preparation call with C. Lascell and R. Van Epps	1.10	1,127.50
06/16/2025	H P LONG, III	B190	Analyze and work on responses to Travelers' interrogatories (1.80), and communications with C. Lascell (.30) and K. Brinkman (.70) regarding the same	2.80	2,870.00
06/16/2025	H P LONG, III	B190	Analyze and work on responses to Chubb interrogatories (2.30), and communications with C. Lascell regarding the same (.60)	2.90	2,972.50
06/16/2025	H P LONG, III	B190	Communications with K. Courington regarding third interim stay order	0.30	307.50
06/16/2025	H P LONG, III	B190	Analyze and work on reply in support of motion to dismiss	1.10	1,127.50
06/16/2025	H P LONG, III	B190	Analyze and work on reply in support of motion to quash	1.60	1,640.00
06/16/2025	T L CANADA	B190	Work on revised proposed order for 4th automatic stay motion	0.60	246.00
06/16/2025	N S MONICO	B190	Finalize Liberty privilege log	1.00	695.00
06/16/2025	T P BROWN	B190	Review docket entries in FCR appeal	0.20	297.00

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06/16/2025	T P BROWN	B190	Emails with O.Greenberg re proposed settlement of informal objection	0.30	445.50
06/16/2025	T P BROWN	B190	Work on Travelers issues and related responses and conferences with T.Long and review related emails	0.40	594.00
06/16/2025	T P BROWN	B190	Conference with T.Long re revising responses based on insurance counsel call and related emails	0.30	445.50
06/17/2025	T L CANADA	B190	Finalize and electronically file Debtor's Witness and Exhibit List to June 18th Hearing	0.30	123.00
06/17/2025	T L CANADA	B190	Finalize and electronically file Reply in Support of Motion to Dismiss in the Chubb adversary proceeding	0.30	123.00
06/17/2025	T L CANADA	B190	Finalize and electronically file Reply in Support of Motion to Quash third party subpoena	0.30	123.00
06/17/2025	N S MONICO	B190	Research in support of motion to dismiss Chubb FCR appeal	1.30	903.50
06/17/2025	T L CANADA	B190	Prepare hearing materials for June 18th hearing	2.50	1,025.00
06/17/2025	H P LONG, III	B190	Analyze and finalize exhibit and witness list for June 18 hearing	0.70	717.50
06/17/2025	H P LONG, III	B190	Analyze and finalize reply in support of motion to dismiss Chubb adversary proceeding	0.70	717.50
06/17/2025	H P LONG, III	B190	Analyze and finalize reply in support of motion to quash subpoena on SCS	0.80	820.00
06/17/2025	H P LONG, III	B190	Analyze revisions to confidentiality agreement from counsel to Travelers (.50) and communications with counsel to Travelers (.10) and C. Lascell (.30) regarding the same	0.90	922.50



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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/17/2025	H P LONG, III	B190	Work on stipulations of fact for objection to Liberty claim (.70), and communications with counsel to Liberty regarding the same (.60)	1.30	1,332.50
06/17/2025	H P LONG, III	B190	Analyze motion to adjourn confirmation hearing filed by Chubb and strategy to address same	1.20	1,230.00
06/17/2025	H P LONG, III	B190	Prepare for June 18 hearing	1.40	1,435.00
06/17/2025	H P LONG, III	B190	Revise 4th interim stay order to address resolution of comments from Boling and Hoffman firms (.70), and communications with counsel from Jackson Walker regarding the same (.60)	1.30	1,332.50
06/17/2025	T P BROWN	B190	Review and revise reply on motion to quash and review related documents	1.30	1,930.50
06/17/2025	T P BROWN	B190	Review emails with LMIC re discovery disputes	0.20	297.00
06/17/2025	T P BROWN	B190	Review SCS sample documents and consider arguments on motion to quash	1.60	2,376.00
06/17/2025	T P BROWN	B190	Prepare for 6/18 hearings and work on related outlines	2.70	4,009.50
06/17/2025	T P BROWN	B190	Review first amended LMIC complaint, related exhibits and email from LMIC counsel	0.50	742.50
06/17/2025	T P BROWN	B190	Conferences with T.Long re comments on proposed revisions to fourth interim order to settle informal objection and related emails to T.Long	0.30	445.50
06/17/2025	T P BROWN	B190	Conference with T.Long re filing LMIC exhibits and reply under seal	0.30	445.50

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06/17/2025	T P BROWN	B190	Review and revise agenda for 6/18 hearing and review and revise related witness and exhibit lists.	0.30	445.50
06/17/2025	T P BROWN	B190	Conference with T.Long re call with chambers and committee counsel re pretrial conference in Chubb	0.20	297.00
06/17/2025	T P BROWN	B190	Work on resolving informal objection to fourth interim order extending stay	0.40	594.00
06/17/2025	T P BROWN	B190	Conference with T.Long re responses to Chubb discovery emails and disputes	0.20	297.00
06/17/2025	T P BROWN	B190	Emails with P.Barrett re 6/18 hearing	0.10	148.50
06/17/2025	T P BROWN	B190	Review emails with Travelers and related conference with T.Long re confidentiality agreement revisions	0.20	297.00
06/17/2025	C A RANKIN	B190	Analyze debtor's reply ISO motion to quash subpoena of SCS (.4); review Chubb's motion to adjourn confirmation hearing (.6) and Traveler's joinder regarding same (.2).	1.20	1,074.00
06/18/2025	T P BROWN	B190	Emails with SCS re results of hearing on motion to quash subpoena	0.10	148.50
06/18/2025	T P BROWN	B190	Emails with K.Courington re hearing results	0.20	297.00
06/18/2025	T P BROWN	B190	Meetings with committee counsel re confirmation, motion strategy and motion to dismiss LMIC appeal	0.50	742.50
06/18/2025	T P BROWN	B190	Attend hearings on 6/18 on motion to dismiss Chubb A.P.; motion to quash objection to LMIC claim and 4th interim order on stay extension	3.10	4,603.50

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06/18/2025	T P BROWN	B190	Prepare for hearings on motion to quash and objection to LMIC claims	2.30	3,415.50
06/18/2025	J P ROVIRA	B190	Review amended complaint filed by Liberty Mutual.	0.70	770.00
06/18/2025	J P ROVIRA	B190	Attention to correspondence regarding discovery issues with confirmation discovery (.8); discuss issues relating to open items and strategy for confirmation hearing with T. Brown (1.0); review Motion to Continue and address issues related to same (1.0).	2.80	3,080.00
06/18/2025	H P LONG, III	B190	Analyze and respond to email from counsel to Chubb regarding discovery	0.80	820.00
06/18/2025	H P LONG, III	B190	Analyze and prepare order approving motion to quash subpoena on Chubb	0.70	717.50
06/18/2025	H P LONG, III	B190	Prepare order approving motion to dismiss Chubb adversary proceeding for submission to court	0.60	615.00
06/18/2025	N S MONICO	B190	Analyze amended Liberty complaint	0.30	208.50
06/18/2025	T L CANADA	B190	Finalize and submit Order granting the Motion to Dismiss in the Chubb Adversary Proceeding	0.20	82.00
06/18/2025	T L CANADA	B190	Finalize and electronically file Order granting 4th automatic stay	0.20	82.00
06/18/2025	H P LONG, III	B190	Analyze and finalize revised order approving 4th interim stay order to and notice of same	0.60	615.00
06/18/2025	H P LONG, III	B190	Finalize confidentiality agreement with Travelers (.40), and and prepare and produce confidential production to counsel to Travelers (.70)	1.10	1,127.50
06/18/2025	H P LONG, III	B190	Prepare for and participate in June 18 omnibus hearing	4.70	4,817.50

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06/18/2025	H P LONG, III	B190	Analyze amended adversary proceeding filed by Liberty	0.60	615.00
06/18/2025	C A RANKIN	B190	Analyze briefing in relation to 6/18 hearing (1.1) and attend 6/18 hearing (1.6).	2.70	2,416.50
06/18/2025	N S MONICO	B190	Draft motion to dismiss Chubb appeal of FCR Order	3.80	2,641.00
06/18/2025	T L CANADA	B190	Prepare hearing materials for June 18th hearing	1.60	656.00
06/18/2025	T L CANADA	B190	Finalize and electronically file notice of revised order granting the 4th automatic stay motion	0.80	328.00
06/18/2025	T L CANADA	B190	Work on production to Travelers' production request and update production log regarding same	1.20	492.00
06/19/2025	H P LONG, III	B190	Analyze and respond to email from Chubb counsel regarding discovery	0.80	820.00
06/19/2025	H P LONG, III	B190	Analyze and work on responses to Liberty discovery requests (2.90), and communications with C. Lascell regarding the same (.40)	3.30	3,382.50
06/19/2025	T P BROWN	B190	Work on responses to Liberty's new discovery requests	0.50	742.50
06/19/2025	T P BROWN	B190	Work on responses to Chubb's meet and confer response and related strategy	0.20	297.00
06/19/2025	T P BROWN	B190	Conference and emails with T.Long re Chubb discovery dispute and meet and confer issues	0.50	742.50
06/20/2025	N S MONICO	B190	Prepare motion to dismiss FCR appeal (1.8); review and finalize the same (.9)	2.70	1,876.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/20/2025	C A RANKIN	B190	Analyze correspondence from and with Chubb counsel regarding discovery (.4); analyze Chubb's motion to adjourn confirmation hearing and joinders of Travelers and Liberty to same (1.2).	1.60	1,432.00
06/20/2025	T P BROWN	B190	Review 2019 disclosure from Landry & Swarr	0.10	148.50
06/20/2025	T P BROWN	B190	Emails with T.Long re Chubb discovery issues and conferences with T.Long re proposed responses	0.50	742.50
06/20/2025	H P LONG, III	B190	Analyze strategy for reply to Chubb's motion to adjourn confirmation hearing.	1.20	1,230.00
06/20/2025	H P LONG, III	B190	Communications with counsel to FCR regarding hearing on motion to adjourn	0.40	410.00
06/20/2025	H P LONG, III	B190	Finalize and serve response to Liberty discovery requests (1.80), and communications with C. Lascell regarding the same (.40)	2.20	2,255.00
06/20/2025	H P LONG, III	B190	Communications with counsel to Chubb regarding issues related to discovery	1.40	1,435.00
06/21/2025	H P LONG, III	B190	Communications with C. Lascell and R. Van Epps regarding 30(b)(6) depositions	0.60	615.00
06/23/2025	H P LONG, III	B190	Communications with Committee counsel regarding FTI deposition	0.40	410.00
06/23/2025	H P LONG, III	B190	Multiple communications with counsel to Liberty regarding discovery and analyze related issues	1.60	1,640.00
06/23/2025	H P LONG, III	B190	Analyze and respond to email from counsel to Chubb regarding 30(b)(6) deposition	0.60	615.00

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06/23/2025	H P LONG, III	B190	Analyze and finalize objection to motion to adjourn (1.30), and communications with committee counsel regarding the same (.40)	1.70	1,742.50
06/23/2025	N S MONICO	B190	Analyze Roussel claimant E.D. La. lawsuit regarding arguments by Liberty with respect to 2003 settlement	0.60	417.00
06/24/2025	T L CANADA	B190	Prepare documents for discovery response to Liberty and Chubb	0.50	205.00
06/24/2025	H P LONG, III	B190	Multiple communications with counsel to Liberty regarding discovery and analyze related issues	2.40	2,460.00
06/24/2025	H P LONG, III	B190	Work on order approving motion to quash Chubb's subpoena on SCS	0.80	820.00
06/24/2025	T P BROWN	B190	Prepare for and attend hearing on committee motion to quash deposition notice and review LMIC objection	1.00	1,485.00
06/24/2025	T P BROWN	B190	Revise proposed order on order quashing SCS subpoena and review transcript for same	0.20	297.00
06/24/2025	C A RANKIN	B190	Analyze Liberty's objection to Committee's motion to quash deposition notice and notice of appeal.	0.30	268.50
06/25/2025	N S MONICO	B190	Calculate new deadlines in light of service of Amended Liberty Complaint	0.30	208.50
06/25/2025	H P LONG, III	B190	Multiple communications with Liberty regarding discovery and analyze related issues	1.80	1,845.00
06/25/2025	T P BROWN	B190	Conference with J.Rovira re litigation strategy in LMIC A.P. and re appeals	0.30	445.50
06/25/2025	T P BROWN	B190	Telephone call with T.Phillips re Resolute settlement and administrative expenses	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/25/2025	T P BROWN	B190	Conference with T.Long re adjournment of LMIC 3018 motion to 7/14 hearing from 7/1	0.10	148.50
06/26/2025	T L CANADA	B190	Finalize and submit order regarding Motion to Quash Subpoena to the Court	0.20	82.00
06/26/2025	H P LONG, III	B190	Analyze and respond to questions from K. Courington regarding 4th interim stay order	0.30	307.50
06/26/2025	H P LONG, III	B190	Analyze brief in support of motion to dismiss Liberty adversary proceeding filed by Roussel claimants	0.90	922.50
06/26/2025	T P BROWN	B190	Review Roussel motion to dismiss and memo in support of motion to dismiss LMIC complaint	0.60	891.00
06/26/2025	T P BROWN	B190	Review clerk letter in appeal of LMIC claim denial and review record notice	0.10	148.50
06/26/2025	T P BROWN	B190	Review emails with K.Courington re stay relief order	0.10	148.50
06/27/2025	T P BROWN	B190	Review notice of hearing on motion to dismiss LMIC A.P. filed by Roussel firm	0.10	148.50
06/27/2025	T P BROWN	B190	Review LMIC filing on motion to withdraw the reference in LMIC litigation	0.20	297.00
06/27/2025	T P BROWN	B190	Emails with T.Long re document production and related mediation order provisions	0.20	297.00
06/27/2025	T P BROWN	B190	Conference with T.Long re documents produced and potential reclaim of them	0.40	594.00
06/27/2025	H P LONG, III	B190	Participate in deposition preparation call with C. Lascell	0.80	820.00
06/27/2025	H P LONG, III	B190	Communications with Committee counsel regarding production related to FTI (.20) and analyze same (.70)	0.90	922.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/29/2025	T P BROWN	B190	Consider potential motion in limine and related strategy	0.30	445.50
06/30/2025	H P LONG, III	B190	Analyze discovery productions in connection with confirmation	2.10	2,152.50
06/30/2025	J W HARBOUR	B190	Analysis of discovery issues and communications with counsel	0.20	286.00
06/30/2025	T P BROWN	B190	Conference with J.Harbour re clawback issue and motion in limine strategy	0.30	445.50
06/30/2025	T P BROWN	B190	Conference with T.Long re motion in limine and review of affected documents	0.40	594.00
06/30/2025	T P BROWN	B190	Consider strategy re motion in limine	0.20	297.00
06/30/2025	T P BROWN	B190	Review entered version of order quashing SCS subpoena	0.10	148.50
			<b>TOTAL B190</b>	<b>358.00</b>	
06/09/2025	T P BROWN	B210	Emails with R.Van Epps, C.Lascell and P.Santelle re payment received from Gen Re	0.20	297.00
06/19/2025	H P LONG, III	B210	Analyze and comment on monthly operating report (.60) and communications with Stout regarding the same (.20)	0.80	820.00
06/23/2025	T P BROWN	B210	Review emails with C.Lascell and T.Long re monthly operating report	0.10	148.50
06/23/2025	H P LONG, III	B210	Analyze and finalize monthly operating report	0.60	615.00
06/23/2025	T L CANADA	B210	Electronically file May Monthly Operating Report	0.10	41.00
06/30/2025	T P BROWN	B210	Emails with C.Lascell re expected settlement wire	0.10	148.50
			<b>TOTAL B210</b>	<b>1.90</b>	
06/05/2025	H P LONG, III	B310	Analyze amended claim filed by Liberty (.50), and communications with Verita (.10) and counsel to Liberty (.10) regarding the same	0.70	717.50



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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/06/2025	T P BROWN	B310	Review LMIC notice and motion re temporary allowance of claim	0.30	445.50
06/11/2025	H P LONG, III	B310	Analyze issues related to amended Liberty proof of claim and strategy for objection (.60) and communications with counsel to Committee regarding the same (.30)	0.90	922.50
06/13/2025	T P BROWN	B310	Work on LMIC reply to claim objection	0.40	594.00
06/13/2025	T P BROWN	B310	Research re pending claim and review related complaint	0.20	297.00
06/15/2025	T P BROWN	B310	Prepare for hearing on claim objection and consider reply	0.60	891.00
06/16/2025	C A RANKIN	B310	Analyze reply in support of objection to LMIC proof of claim.	0.60	537.00
06/17/2025	T P BROWN	B310	Review and revise proposed LMIC stipulation re defense costs	0.30	445.50
06/17/2025	T P BROWN	B310	Conferences with T.Long re final changes to reply for LMIC claim objection	0.20	297.00
06/17/2025	T P BROWN	B310	Draft reply to LMIC claim objection	1.90	2,821.50
06/17/2025	H P LONG, III	B310	Analyze and finalize reply in support of objection to Liberty's claim (1.10), work on redactions to same for filing under seal (.60), and communications with counsel to Liberty regarding sealed objection (.20)	1.90	1,947.50
06/17/2025	T L CANADA	B310	Prepare Sealed and redacted filing versions of Reply in Support of the Claim Objection to Liberty's Claim No. 10 and electronically file same	1.10	451.00
06/18/2025	T P BROWN	B310	Review and revise proposed order on LMIC claim objection	0.20	297.00

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06/18/2025	H P LONG, III	B310	Prepare order approving objection to Liberty claim for submission to court	0.60	615.00
06/18/2025	T L CANADA	B310	Finalize and submit order regarding Liberty Claim objection	0.20	82.00
06/23/2025	T P BROWN	B310	Review draft of objection to LMIC 3018 motion and related email with T.Long	0.30	445.50
06/24/2025	T P BROWN	B310	Review LMIC notice of appeal of claim denial	0.10	148.50
06/24/2025	T P BROWN	B310	Review objection and joinder on 3018 motion	0.20	297.00
06/24/2025	T L CANADA	B310	Finalize and electronically file Objection to Motion of Liberty Mutual Insurance Company for Entry of an Order Temporarily Allowing Claim No. 19 Pursuant to Bankruptcy Rule 3018(A)	0.30	123.00
06/27/2025	T P BROWN	B310	Review email from SCS re release received on settled claim	0.10	148.50
			<b>TOTAL B310</b>	<b>11.10</b>	
06/01/2025	T P BROWN	B320	Work on confirmation evidence outline	0.70	1,039.50
06/02/2025	T P BROWN	B320	Review amended articles of incorporation and bylaws for Reorganized Debtor	0.40	594.00
06/02/2025	T P BROWN	B320	Review proposed updated claimant release form from committee counsel	0.20	297.00
06/02/2025	H P LONG, III	B320	Analyze issues and strategy to prepare for confirmation hearing	0.70	717.50
06/02/2025	H P LONG, III	B320	Analyze and comment on Reorganized Hopeman Bylaws	1.10	1,127.50
06/02/2025	T P BROWN	B320	Consider approach to resolve potential objection to plan and to extension motion	0.30	445.50
06/02/2025	T P BROWN	B320	Work on confirmation hearing outline	1.60	2,376.00

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06/03/2025	H P LONG, III	B320	Continue to analyze and work on strategy for confirmation hearing	0.80	820.00
06/04/2025	H P LONG, III	B320	Analyze and work on list of asbestos insurance policies for plan supplement	1.20	1,230.00
06/04/2025	H P LONG, III	B320	Analyze and work on list of vendors for plan supplement	0.90	922.50
06/04/2025	T P BROWN	B320	Prepare for FTI call on confirmation issues and prepare outline of issues and testimony	1.80	2,673.00
06/04/2025	T P BROWN	B320	Call with FTI and committee lawyers re confirmation hearing	0.50	742.50
06/04/2025	T P BROWN	B320	Work on plan supplement issues and related conferences with T.Long	0.40	594.00
06/04/2025	H P LONG, III	B320	Prepare for and participate in call with Committee counsel to prepare for confirmation hearing	1.10	1,127.50
06/05/2025	H P LONG, III	B320	Communications with D. Cox regarding plan supplement	0.40	410.00
06/05/2025	T P BROWN	B320	Review committee email re insurance policies for plan supplement and related conferences with T.Long	0.30	445.50
06/06/2025	H P LONG, III	B320	Analyze and finalize plan supplement (2.10), and multiple communications with Committee counsel regarding the same (.80)	2.90	2,972.50
06/06/2025	T P BROWN	B320	Work on confirmation issues and strategy and potential evidence	1.60	2,376.00
06/06/2025	T P BROWN	B320	Review emails with committee counsel re revisions to plan supplement documents	0.10	148.50
06/06/2025	T P BROWN	B320	Review changes to proposed plan supplement documents and related notice	0.60	891.00

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06/06/2025	T P BROWN	B320	Review changes to TDP and trust documents	0.50	742.50
06/07/2025	T P BROWN	B320	Consider strategy re confirmation hearing and outline testimony	2.40	3,564.00
06/07/2025	T P BROWN	B320	Review transcript of confirmation hearing and declarations from prior 524(g) case	1.70	2,524.50
06/08/2025	T P BROWN	B320	Review transcript of precedent confirmation hearing and related declarations	0.80	1,188.00
06/09/2025	T P BROWN	B320	Draft witness outlines and potential declarations for confirmation hearing	4.30	6,385.50
06/09/2025	T P BROWN	B320	Review case precedents and related transcripts and declarations for confirmation hearing	3.70	5,494.50
06/10/2025	J P ROVIRA	B320	Continue to address issues relating to discovery and strategy for addressing confirmation objections of insurers.	1.00	1,100.00
06/10/2025	H P LONG, III	B320	Communications with Verita regarding status of plan voting	0.60	615.00
06/10/2025	T P BROWN	B320	Review email from K.Courington re potential confirmation objection and consider strategy	0.20	297.00
06/10/2025	T P BROWN	B320	Emails with committee counsel re call with FCR's counsel	0.10	148.50
06/10/2025	T P BROWN	B320	Work on declarations for confirmation witnesses	3.30	4,900.50
06/10/2025	T P BROWN	B320	Review committee suggested prep outline for cross of FTI witness and emails re same	0.40	594.00
06/10/2025	T P BROWN	B320	Work on direct outline for FTI witness for confirmation	1.40	2,079.00
06/11/2025	T P BROWN	B320	Prepare witness prep outlines and declarations for confirmation hearing	3.60	5,346.00

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06/11/2025	T P BROWN	B320	Call with FCR's counsel and committee counsel	0.40	594.00
06/11/2025	T P BROWN	B320	Prepare for and participate in witness prep for confirmation hearing	1.60	2,376.00
06/11/2025	H P LONG, III	B320	Prepare for and participate in confirmation hearing prep call with Debtor and Committee professionals	1.40	1,435.00
06/11/2025	H P LONG, III	B320	Communications with Verita (.40) and Committee counsel (.30) regarding voting status and analyze issues related to same (.60)	1.30	1,332.50
06/12/2025	T L CANADA	B320	Electronically file certificate of service for Solicitation Package	0.20	82.00
06/12/2025	T P BROWN	B320	Work on witness outlines for confirmation hearings	2.80	4,158.00
06/12/2025	T P BROWN	B320	Conference with T.Long re votes on plan	0.20	297.00
06/12/2025	T P BROWN	B320	Emails with T.Long re LMIC provisional ballot request	0.10	148.50
06/12/2025	T P BROWN	B320	Emails with R.Van Epps and C.Lascell re witness prep session and update	0.20	297.00
06/12/2025	H P LONG, III	B320	Analyze request from Liberty for provisional ballot (.50) and communications with Verita regarding the same (.30)	0.80	820.00
06/12/2025	H P LONG, III	B320	Communications with C. Lascell and R. Van Epps regarding witness prep for confirmation hearing	0.40	410.00
06/12/2025	J P ROVIRA	B320	Review Plan Supplement and related documents and address issues relating to strategy and potential objection from insurers.	1.50	1,650.00
06/13/2025	T P BROWN	B320	Review voting results and related emails with T.Long re unacceptable ballot and impact on voting	0.20	297.00

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06/13/2025	T P BROWN	B320	Emails to C.Lascell and other advisors on plan voting results	0.40	594.00
06/13/2025	T P BROWN	B320	Email to and from C.Lascell re potential settlement of extension/plan objection	0.20	297.00
06/13/2025	T P BROWN	B320	Conference with J.Rovira re outstanding issues and confirmation prep	0.60	891.00
06/13/2025	T P BROWN	B320	Work on strategy for confirmation testimony and evidence	0.60	891.00
06/13/2025	H P LONG, III	B320	Analyze ballot summary from Verita and related issues	0.70	717.50
06/13/2025	H P LONG, III	B320	Communications with Committee counsel regarding balloting summary and strategy for confirmation hearing	0.60	615.00
06/13/2025	J P ROVIRA	B320	Address strategy regarding responses to expected objections of insurers to Plan (1.0); discuss same with T. Brown (.8).	1.80	1,980.00
06/16/2025	T P BROWN	B320	Prepare for witness prep sessions and revise related outlines	1.70	2,524.50
06/16/2025	T P BROWN	B320	Call with R.Van Epps, C.Lascell and T.Long re plan testimony topics and related issues	1.00	1,485.00
06/16/2025	T P BROWN	B320	Work on plan confirmation strategy and testimony needed and consider responses and related research to insurer-expected objections	2.60	3,861.00
06/17/2025	H P LONG, III	B320	Analyze comments to plan from UST and strategy to address same	0.60	615.00
06/17/2025	T P BROWN	B320	Emails with UST, committee and T.Long re UST's proposed revisions to plan and consider responses	0.60	891.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/18/2025	T P BROWN	B320	Emails with committee counsel re requests for deposition of C.Tully	0.20	297.00
06/18/2025	T P BROWN	B320	Call with R.Van Epps re confirmation hearing topics and insurance issues	0.50	742.50
06/18/2025	N S MONICO	B320	Consider anticipated plan objections with T.Brown	0.20	139.00
06/18/2025	C A RANKIN	B320	Conference with J. Rovira regarding open items regarding confirmation briefing (.4) and begin considering arguments regarding same (.7).	1.10	984.50
06/18/2025	T P BROWN	B320	Review motion of Chubb to expedite and motion to adjourn confirmation hearing	0.80	1,188.00
06/18/2025	T P BROWN	B320	Emails with R.Van Epps re expected testimony for confirmation	0.20	297.00
06/18/2025	T P BROWN	B320	Conference with J.Rovira re hearing results and confirmation preparation	0.60	891.00
06/18/2025	T P BROWN	B320	Conferences with T.Long re confirmation briefs and findings	0.30	445.50
06/18/2025	T P BROWN	B320	Work on responses to Travelers discovery and meeting with Travelers counsel	0.30	445.50
06/18/2025	T P BROWN	B320	Work on responses to LMIC new discovery	0.40	594.00
06/19/2025	H P LONG, III	B320	Analyze precedent related to findings of fact and conclusions of law in support of plan (.80) and communications with Committee counsel regarding the same (.40)	1.20	1,230.00

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06/19/2025	C A RANKIN	B320	Prepare for and participate in conference with T. Brown and J. Rovira regarding open items for confirmation briefing and confirmation order (.5); initially analyze articles and case law support for same (.7).	1.20	1,074.00
06/19/2025	H P LONG, III	B320	Analyze precedent and strategy related to brief in support of plan (1.10) and communications with Committee counsel regarding the same (.60)	1.70	1,742.50
06/19/2025	H P LONG, III	B320	Analyze 30(b)(6) notices from insurers and strategy related to same	0.60	615.00
06/19/2025	H P LONG, III	B320	Work on resolution of US Trustee's comments concerning plan	0.60	615.00
06/19/2025	J P ROVIRA	B320	Prepare for and participate in meeting concerning preparation of open items for upcoming confirmation hearing (1.5); begin review of precedent confirmation orders and briefs related to same (1.3).	2.80	3,080.00
06/19/2025	T P BROWN	B320	Work on strategy re responses to potential plan objections including insurance neutrality	2.20	3,267.00
06/19/2025	T P BROWN	B320	Work on plan confirmation evidence and potential testimony	1.40	2,079.00
06/19/2025	T P BROWN	B320	Call with J.Rovira, B.Bell, C.Rankin and T.Long re findings of fact, brief and related plan confirmation research	0.80	1,188.00
06/19/2025	T P BROWN	B320	Review and consider topics for potential deposition of Hopeman from Chubb	0.20	297.00
06/19/2025	T P BROWN	B320	Email to K.Montgomery re proposed resolution of UST plan concerns	0.10	148.50



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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/19/2025	T P BROWN	B320	Emails with Brandon Bell re case precedents for research and locate materials	0.50	742.50
06/19/2025	T P BROWN	B320	Emails with P.Guffy re precedent for research and locate materials	0.40	594.00
06/19/2025	T P BROWN	B320	Emails with R.Van Epps and K.Brinkman re proposed insurance topics call for plan	0.30	445.50
06/19/2025	T P BROWN	B320	Email to and from committee counsel re proposed call on plan insurance issues	0.20	297.00
06/19/2025	T P BROWN	B320	Emails with committee counsel re UST comments and question on plan	0.10	148.50
06/19/2025	T P BROWN	B320	Review LMIC deposition notice	0.20	297.00
06/19/2025	P M GUFFY	B320	Calls and emails with J. Rovira, T. Brown regarding proposed confirmation order (.5); research regarding same (.5).	1.00	995.00
06/19/2025	B R BELL	B320	Discussion regarding preparation of brief in support of confirmation, including research required for same (.8); preliminary review of relevant precedent for same (.1)	0.90	715.50
06/20/2025	P M GUFFY	B320	Begin drafting proposed confirmation order.	1.00	995.00
06/20/2025	T P BROWN	B320	Work on evidence for confirmation hearing and related outline and declarations	1.50	2,227.50
06/20/2025	T P BROWN	B320	Review emails with committee counsel re 30(b)(6) notice of committee	0.20	297.00
06/20/2025	T P BROWN	B320	Review LMIC joinder re motion to adjourn	0.20	297.00

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06/20/2025	T P BROWN	B320	Review Chubb email re motion to expedite and related motion to adjourn	0.10	148.50
06/20/2025	T P BROWN	B320	Work on declarations in support of confirmation of plan	2.80	4,158.00
06/20/2025	T P BROWN	B320	Call with committee counsel, K.Brinkman, R.Van Epps and T.Long re plan provisions on treatment of insurers and potential plan clarifications	0.80	1,188.00
06/20/2025	J P ROVIRA	B320	Continue to address issues relating to discovery concerning plan and attention to correspondence related to same (.8); review precedent briefing and address strategy for responding to anticipated plan objections (1.0).	1.80	1,980.00
06/20/2025	H P LONG, III	B320	Analyze strategy related to 30(b)(6) depositions (.90), and communications with Committee counsel regarding the same (.50)	1.40	1,435.00
06/20/2025	H P LONG, III	B320	Analyze issues in support of insurance neutrality arguments	1.60	1,640.00
06/20/2025	N S MONICO	B320	Research regarding extension of exclusivity (.9); prepare summary of the same (.4)	1.30	903.50
06/20/2025	N S MONICO	B320	Survey cases regarding solicitation and confirmation issues in comparable 524(g) cases	2.70	1,876.50
06/21/2025	B R BELL	B320	Begin drafting brief in support of confirmation.	4.10	3,259.50
06/21/2025	B R BELL	B320	Analyze and assess relevant authorities regarding 524(g) issues in preparation of reply and brief in support of confirmation.	6.80	5,406.00
06/21/2025	T P BROWN	B320	Emails with T.Long re deposition prep dates	0.10	148.50

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06/21/2025	T P BROWN	B320	Emails with C.Lascell and with R.Van Epps re potential deposition dates and topics	0.20	297.00
06/21/2025	H P LONG, III	B320	Analyze and work on objection to Chubb's motion to adjourn confirmation hearing.	3.60	3,690.00
06/22/2025	H P LONG, III	B320	Analyze and work on objection to Chubb's motion to adjourn confirmation hearing.	4.40	4,510.00
06/22/2025	T P BROWN	B320	Review draft objection to motion to adjourn and begin working on revisions	1.20	1,782.00
06/22/2025	T P BROWN	B320	Review prior transcript and precedent re 524(g) plans and schedules	0.40	594.00
06/22/2025	P M GUFFY	B320	Continue drafting proposed confirmation order.	6.00	5,970.00
06/22/2025	B R BELL	B320	Continued research of relevant 524(g) cases (2.2); review of relevant briefing in connection with same (1.9); continue drafting brief in support of confirmation (1.8)	5.90	4,690.50
06/22/2025	B R BELL	B320	Continue drafting brief in support of confirmation and review authorities related to same.	3.50	2,782.50
06/23/2025	T P BROWN	B320	Review expedited hearing order on motion to adjourn and to quash	0.10	148.50
06/23/2025	T P BROWN	B320	Review committee motion to quash and consider strategy re same	0.40	594.00
06/23/2025	P M GUFFY	B320	Finish drafting proposed confirmation order (.9); emails with J. Rovira regarding same (.2).	1.10	1,094.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/23/2025	B R BELL	B320	Continued preparation of brief in support of confirmation (1.9); review of issues pertaining to various insurance related considerations for same (2.5); and Section 1129 issues specific to 524(g) context for confirmation brief (1.8).	6.20	4,929.00
06/23/2025	C A RANKIN	B320	Analyze FCR's response to Chubb's motion to adjourn plan confirmation.	0.10	89.50
06/23/2025	T P BROWN	B320	Review FCR's response to motion to adjourn	0.30	445.50
06/23/2025	T P BROWN	B320	Review emails between Chubb and committee re Tully deposition and related emails with T.Long re same	0.20	297.00
06/23/2025	T P BROWN	B320	Review committee joinder in objection to adjournment of confirmation hearing.	0.10	148.50
06/23/2025	T P BROWN	B320	Emails with K.Montgomery re resolution of plan issues	0.10	148.50
06/23/2025	T P BROWN	B320	Emails with T.Long re response to Chubb's deposition request of debtor	0.10	148.50
06/23/2025	T P BROWN	B320	Emails with T.Long re proposed response to LMIC discovery issues and related conferences with T.Long	0.50	742.50
06/23/2025	T P BROWN	B320	Emails with R.Van Epps re deposition of debtor and potential testimony	0.20	297.00
06/23/2025	T P BROWN	B320	Emails with committee counsel re deposition date and time for C.Tully deposition	0.10	148.50
06/23/2025	T P BROWN	B320	Emails with C.Lascell re deposition prep call	0.10	148.50
06/23/2025	T P BROWN	B320	Prepare for hearing on motion and joinder to adjourn plan confirmation	2.50	3,712.50

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06/23/2025	T P BROWN	B320	Work on response to motions to adjourn confirmation hearing	2.70	4,009.50
06/23/2025	H P LONG, III	B320	Analyze and work on objection to Liberty 3018 motion	1.60	1,640.00
06/23/2025	H P LONG, III	B320	Communications with Verita regarding voting certification and analyze related issues	0.70	717.50
06/24/2025	B R BELL	B320	Analyze issues pertaining to requirements under section 524(g) (4.2); continued preparation and revision of brief in support of confirmation (3.1).	7.30	5,803.50
06/24/2025	T P BROWN	B320	Emails with insurer's counsel re adjournment of debtor 30(b)(6) deposition	0.20	297.00
06/24/2025	T P BROWN	B320	Review email with J.Rovira re findings of fact and preliminary review of same	0.20	297.00
06/24/2025	T P BROWN	B320	Conferences with T.Long re LMIC discovery issues to resolve and clarify	0.40	594.00
06/24/2025	T P BROWN	B320	Review LMIC notice of deposition of Conor Tully	0.10	148.50
06/24/2025	T P BROWN	B320	Emails with T.Long re privilege log production to LMIC and review same	0.30	445.50
06/24/2025	T P BROWN	B320	Prepare for and attend hearing on motion to adjourn confirmation hearing	3.20	4,752.00
06/24/2025	T P BROWN	B320	Email with C.Lascell re document to review for deposition	0.10	148.50
06/24/2025	T P BROWN	B320	Emails with R.Van Epps re deposition topics and re hearing date	0.20	297.00
06/24/2025	T P BROWN	B320	Email to Chubb's counsel re deposition of C.Tully and review notice from Chubb	0.20	297.00
06/24/2025	T P BROWN	B320	Emails with Traveler's counsel re July 1 deposition for plan issues	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/24/2025	T P BROWN	B320	Consider potential plan stipulations of fact and research needed	0.50	742.50
06/24/2025	T P BROWN	B320	Prepare outline for prep call with C.Lascell	0.80	1,188.00
06/24/2025	T P BROWN	B320	Call with C.Lascell re deposition topics and related documents and issues	1.40	2,079.00
06/24/2025	H P LONG, III	B320	Communications with counsel to Chubb regarding rescheduling 30(b)(6) deposition	0.60	615.00
06/24/2025	H P LONG, III	B320	Prepare for and participate in deposition preparation call with C. Lascell	1.40	1,435.00
06/24/2025	H P LONG, III	B320	Communications with C. Lascell and R. Van Epps regarding confirmation hearing	0.40	410.00
06/24/2025	H P LONG, III	B320	Analyze and finalize objection to Liberty's 3018 motion (.80), and communications with counsel to Liberty regarding hearing on same (.30)	1.10	1,127.50
06/24/2025	H P LONG, III	B320	Prepare for and attend hearing on motion to adjourn confirmation hearing.	2.40	2,460.00
06/24/2025	J P ROVIRA	B320	Prepare for and monitor hearing on Motion to Continue Confirmation (1.5); review and revise proposed findings of fact for confirmation of Plan (3.3).	4.80	5,280.00
06/25/2025	B R BELL	B320	Review relevant filings by likely objectors to confirmation (4.5); incorporate additions to brief in support of confirmation based on same (2.1).	6.60	5,247.00
06/25/2025	T P BROWN	B320	Conferences with T.Long re responding to LMIC follow-up on discovery requests	0.30	445.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/25/2025	T P BROWN	B320	Conference with T.Long re LMIC request re briefing schedule for confirmation and review related emails with LMIC	0.20	297.00
06/25/2025	C A RANKIN	B320	Analyze open items regarding confirmation brief and communications with B. Bell regarding same.	0.60	537.00
06/25/2025	J P ROVIRA	B320	Begin review of proposed confirmation order (1.8); discuss issues related to upcoming confirmation hearing and open items with T. Brown (1.0).	2.80	3,080.00
06/25/2025	H P LONG, III	B320	Analyze and respond to email from counsel to Liberty regarding briefing schedule (.50), and communications with counsel to Committee regarding the same (.20)	0.70	717.50
06/25/2025	H P LONG, III	B320	Analyze and work on draft findings of fact and conclusions of law (2.10), and communications with committee counsel regarding the same (.60)	2.70	2,767.50
06/25/2025	H P LONG, III	B320	Prepare for 30(b)(6) deposition of debtor	2.20	2,255.00
06/25/2025	H P LONG, III	B320	Communications with committee counsel regarding deposition of Tully and 30(b)(6) of committee	0.80	820.00
06/25/2025	T P BROWN	B320	Conference with J.Rovira re confirmation depositions, hearing preparation and strategy	0.50	742.50
06/25/2025	T P BROWN	B320	Work on declarations in support of confirmation	1.90	2,821.50
06/25/2025	T P BROWN	B320	Emails with committee counsel re Tully deposition prep	0.10	148.50
06/25/2025	T P BROWN	B320	Work on open issues list for confirmation and related depositions and litigation	0.40	594.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
06/26/2025	J P ROVIRA	B320	Continue review of confirmation order and related precedent and edit same (1.8); address open issues related to confirmation brief and discuss same with B. Bell (.7).	2.50	2,750.00
06/26/2025	H P LONG, III	B320	Prepare for and participate in deposition preparation call with C. Tully	2.10	2,152.50
06/26/2025	H P LONG, III	B320	Analyze issues related to notice of officers and directors for reorganized debtor (.40), and communications with Committee counsel regarding the same (.20)	0.60	615.00
06/26/2025	H P LONG, III	B320	Analyze and work on findings of fact and conclusions of law in support of confirmation of plan	2.80	2,870.00
06/26/2025	H P LONG, III	B320	Analyze declarations in support of confirmation of plan	1.60	1,640.00
06/26/2025	T P BROWN	B320	Work on declarations for confirmation hearing witnesses	2.70	4,009.50
06/26/2025	T P BROWN	B320	Participate in deposition preparation meeting of Conor Tully with committee counsel	2.60	3,861.00
06/26/2025	T P BROWN	B320	Emails with C.Lascell re deposition preparation	0.10	148.50
06/26/2025	T P BROWN	B320	Conference with T.Long re findings of fact strategy	0.30	445.50
06/26/2025	T P BROWN	B320	Conference with T.Long following Tully prep session	0.10	148.50
06/26/2025	T P BROWN	B320	Email to T.Long re proposed declarations for plan testimony	0.10	148.50
06/26/2025	T P BROWN	B320	Email with committee counsel re deposition for 6/27	0.10	148.50



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06/26/2025	T P BROWN	B320	Review revised prep outline for C.Tully call	0.20	297.00
06/26/2025	P M GUFFY	B320	Call with T. Long regarding proposed confirmation order (.2); review and revise same (1.8).	2.00	1,990.00
06/26/2025	B R BELL	B320	Further additions to brief in support of confirmation (3.9); provide draft of same to restructuring team, including notes on open issues and necessary additional inserts (.6).	4.50	3,577.50
06/27/2025	T P BROWN	B320	Conference with T.Long re FA testimony for confirmation hearing	0.20	297.00
06/27/2025	T P BROWN	B320	Emails with C.Lascell re additional deposition preparation for 6/30	0.10	148.50
06/27/2025	T P BROWN	B320	Call and emails with C.Lascell re deposition preparation for debtor 30(b)(6) topics	1.80	2,673.00
06/27/2025	T P BROWN	B320	Prepare for and participate in deposition of Conor Tully of FTI	6.70	9,949.50
06/27/2025	H P LONG, III	B320	Analyze and work on findings of fact and conclusions of law	1.60	1,640.00
06/27/2025	H P LONG, III	B320	Analyze and comment on confirmation order	0.80	820.00
06/27/2025	H P LONG, III	B320	Attend deposition of C. Tully	5.40	5,535.00
06/27/2025	J P ROVIRA	B320	Begin review of confirmation brief and related issues.	1.00	1,100.00
06/27/2025	T L CANADA	B320	Preparation and research on documents for T. Long and T. Brown for deposition	2.00	820.00
06/27/2025	T P BROWN	B320	Emails with T.Long and T.Canada re committee discovery responses for plan confirmation	0.10	148.50

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06/27/2025	T P BROWN	B320	Conference with T.Long re proposed findings and review related revisions and review related emails with J.Rovira	0.50	742.50
06/27/2025	T P BROWN	B320	Review Travelers' notice of deposition	0.10	148.50
06/27/2025	P M GUFFY	B320	Review and revise proposed confirmation order (3.7); emails with T. Long regarding same (.2).	3.90	3,880.50
06/28/2025	H P LONG, III	B320	Analyze and comment on memorandum of law in support of plan	2.10	2,152.50
06/29/2025	T P BROWN	B320	Prepare outline of topics to cover during deposition preparation and consider related issues	0.90	1,336.50
06/30/2025	T P BROWN	B320	Emails with committee and T.Long re deposition notices	0.10	148.50
06/30/2025	H P LONG, III	B320	Prepare for and participate in deposition preparation call with C. Lascell	2.40	2,460.00
06/30/2025	H P LONG, III	B320	Communications with Committee counsel regarding 30(b)(6) depositions	0.60	615.00
06/30/2025	H P LONG, III	B320	Analyze and work on Lascell Declaration in support of confirmation	1.80	1,845.00
06/30/2025	H P LONG, III	B320	Analyze and work on Tully Declaration in support of confirmation	1.10	1,127.50
06/30/2025	H P LONG, III	B320	Analyze and work on findings of fact and conclusions of law in support of confirmation	2.30	2,357.50
06/30/2025	J W HARBOUR	B320	Analysis of plan confirmation issues including witness issues and communications with counsel	0.20	286.00

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06/30/2025	T P BROWN	B320	Preparation for deposition with C.Lascell and T.Long and prepare outline for same	3.30	4,900.50
06/30/2025	T P BROWN	B320	Consider email from committee counsel and related strategy for plan evidence	0.30	445.50
06/30/2025	T P BROWN	B320	Emails with T.Long re 30(b)(6) of committee for plan confirmation hearing	0.20	297.00
06/30/2025	T P BROWN	B320	Prepare for depositions and consider potential testimony for confirmation hearing	1.70	2,524.50
06/30/2025	T P BROWN	B320	Emails with LMIC counsel re deponent for 7/1 deposition of debtor	0.10	148.50
<b>TOTAL B320</b>				<b>262.90</b>	
<b>TOTAL HOURS</b>				<b>650.10</b>	

**TIMEKEEPER SUMMARY:**

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
T P BROWN	Partner	169.30	1,485.00	251,410.50
J W HARBOUR	Partner	0.60	1,430.00	858.00
J P ROVIRA	Partner	29.60	1,100.00	32,560.00
H P LONG, III	Counsel	225.60	1,025.00	231,240.00
K T BAILEY	Associate	9.50	690.00	6,555.00
B R BELL	Associate	45.80	795.00	36,411.00
P M GUFFY	Associate	15.00	995.00	14,925.00
N S MONICO	Associate	57.50	695.00	39,962.50
C A RANKIN	Associate	31.10	895.00	27,834.50
R RUBIN	Associate	7.10	695.00	4,934.50
T L CANADA	Paralegal	59.00	410.00	24,190.00
<b>TOTAL FEES (\$)</b>				<b>670,881.00</b>

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CODE	DESCRIPTION	HOURS	VALUE
B110	Case Administration	12.40	7,651.50
B160	Fee / Employment Applications	3.80	3,923.50
B190	Other Contested Matters (excluding assumption / rejection motions)	358.00	340,806.00
B210	Business Operations	1.90	2,070.00
B310	Claims Administration and Objections	11.10	12,523.50
B320	Plan and Disclosure Statement (including Business Plan)	262.90	303,906.50
		<b>650.10</b>	<b>670,881.00</b>

**FOR COSTS ADVANCED AND EXPENSES INCURRED:**

CODE	DESCRIPTION	AMOUNT
E106	Online Research	2,548.18
E109	Local Travel	30.00
E116	Trial Transcripts	328.70
E118	Litigation Support Vendors	5,258.15
	<b>TOTAL CURRENT EXPENSES (\$)</b>	<b>8,165.03</b>

**INVOICE SUMMARY:**

Current Fees:	\$ 670,881.00
Current Charges:	8,165.03
<b>CURRENT INVOICE AMOUNT DUE:</b>	<b>\$ 679,046.03</b>