

REAVES PLLC

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CAMPBELL & LEVINE, LLC

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Counsel to Marla Rosoff Eskin, Esq. Future Claimants' Representative

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

IN RE:)	
)	
HOPEMAN BROTHERS, INC.)	CASE NO. 24-32428-KLP
)	
DEBTOR.)	
)	

**THIRD MONTHLY FEE STATEMENT OF CAMPBELL &
LEVINE, LLC AS COUNSEL TO THE FUTURE CLAIMANTS'
REPRESENTATIVE FOR THE PERIOD AUGUST 1, 2025
THROUGH AUGUST 31, 2025**

Name of Applicant:	Campbell & Levine, LLC
Name of Client:	FCR
Date of Retention:	June 18, 2025, effective as of May 15, 2025
Time Period Covered:	August 1, 2025 through August 31, 2025
Total Fees Requested:	\$55,215.20 (80% of \$69,019.00)
Total Expenses Requested:	\$2,398.70
Type of Fee Statement:	Monthly in accordance with the Interim Compensation Order



AND NOW, comes Campbell & Levine, LLC (the “Applicant”), counsel to Marla Rosoff Eskin, as Future Claimants’ Representative (the “FCR”) for the estate of the debtor, Hopeman Brothers, Inc. (the “Debtor”), pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Rules”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief*, entered September 9, 2024 [Dkt. 162] (the “Interim Compensation Order”) and submits this Third Monthly Fee Statement (this “Fee Statement”) for the reasonable and necessary legal services rendered by the Applicant for the period August 1, 2025, through August 31, 2025 (the “Application Period”) and reimbursement of the actual and necessary expenses that the Applicant incurred during the Application Period.

By this Fee Statement, the Applicant seeks payment of its reasonable and necessary legal fees and expenses incurred during the Application in the total amount of \$69,019.00, consisting of (i) \$55,215.20, which is 80% of the fees incurred by the Applicant for reasonable and necessary legal services to the FCR during the Application Period, and (ii) \$2,398.70 for actual and necessary costs and expenses.

Itemization of Services and Legal Fees Incurred

1. In support of this Fee Statement, the Applicant has attached:
 - a. A summary schedule of hours and fees incurred by the Applicant during this Application period, categorized by nature of the legal services performed, as Exhibit A.
 - b. A summary schedule of hours expended by all attorneys and paralegals related

to the Applicant's representation of the FCR during the Application Period, attached hereto as Exhibit B.

- c. A summary of all expenses incurred by the Applicant during the Application Period, attached hereto as Exhibit C.
- d. Detailed invoices for the hours expended and fees incurred, as well as expenses incurred, by the Applicant during the Application Period.

Representations

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

Notice

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

WHEREFORE, the Applicant requests payment of its reasonable fees and expenses incurred during the Application Period in the amount of \$69,019.00, consisting of (i) \$55,215.20, which is 80% of the fees incurred by the Applicant for reasonable and necessary legal services to the FCR during the Application Period, and (ii) \$2,398.70 for actual and necessary costs and expenses.

Dated: September 15, 2025

Respectfully submitted,

/s/ Michael G. Wilson

Michael G. Wilson (VSB No. 48927)

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*Counsel to Marla Rosoff Eskin, Esq. Future
Claimants' Representative*

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

Task Code	Matter Description	Hours	Fees Requested
.01	Plan of Reorganization	60.7	\$33,736.50
.02	Liberty Mutual Declaratory Judgment Action	47.5	\$28,817.50
.03	Travel	9.2	\$6,465.00
TOTAL		117.4	\$69,019.00

EXHIBIT B

Professionals Rendering Services During the Fee Period

The Campbell & Levine who rendered professional services to the FCR in this chapter 11 case during the Application Period include:

Professional	Position	Hourly Billing Rate	Total Hours Billed	Total Compensation
Douglas A. Campbell	Member	\$900.00	2.5	\$2,250.00
David B. Salzman	Member	\$825.00	46.7	\$38,527.50
Kathryn L. Harison	Member	\$450.00	47.8	\$21,510.00
Fred D. Rapone	Counsel	\$475.00	2.5	\$1,187.50
Marla R. Eskin	Member	\$800.00	2.2	\$1,760.00
Joseph C. Bacharach	Associate	\$275.00	11.4	\$3,135.00
Heather L. Jiuliente	Paralegal	\$155.00	3.8	\$589.00
Kaitlan A. Monahan	Paralegal	\$120.00	0.5	\$60.00
		Total	117.4	\$69,019.00

EXHIBIT C

Summary of Expenses

Type	Amount
Travel Related Expenses	\$981.76
Westlaw/Pacer and Related Office Expenses	\$1,396.09

EXHIBIT D

Statements for August 1, 2025, through August 31, 2025

**CAMPBELL
& LEVINE, LLC** | Attorneys at Law

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Page: 1

Hopeman Brother, Inc.

Statement Date: August 31, 2025
Statement No. 3
Account No. 3100.00

Costs and Expenses

	PREVIOUS BALANCE	\$9,445.32
08/27/2025	DBS - Mileage expense from Pittsburgh to Richmond	494.20
08/27/2025	DBS - Toll expense from Pittsburgh to Richmond	15.76
08/27/2025	KLH - Mileage expenses for travel from Pittsburgh to Richmond and back for Confirmation Hearings 8/24-8/27/2025	471.80
08/29/2025	Scanning - August, 2025	10.20
08/31/2025	Westlaw charges for August, 2025	1,295.79
08/31/2025	Pacer charges for August, 2025	100.30
08/31/2025	Copier charges for August, 2025	10.65
	TOTAL EXPENSES	2,398.70
	TOTAL CURRENT WORK	2,398.70
	BALANCE DUE	<u>\$11,844.02</u>

Any payments received after the statement date will be applied to next month's statement. Please note your account number on your payment. Thank you.

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Page: 1

Hopeman Brother, Inc.

Statement Date: August 31, 2025
Statement No. 3
Account No. 3100.01

Plan of Reorganization

		PREVIOUS BALANCE		\$139,115.50
			HOURS	
08/01/2025	DBS	Correspondence exchange with M. Wilson	0.20	165.00
08/04/2025	DBS	Call with KLH re: confirmation issues and strategy	0.30	247.50
	DBS	Review correspondence exchange re: exhibit assembly	0.40	330.00
	KLH	Review Plan and Brief in Support of Plan filed by Plan Proponents; review law related to same and outline response brief in support	2.10	945.00
	KLH	Call with DBS re: confirmation issues and strategy	0.30	135.00
08/05/2025	KLH	Research related to Plan issues and draft brief in support of Plan	1.30	585.00
08/06/2025	DBS	Call with T. Long and M. Wilson re: case developments	0.30	247.50
	DBS	Call with KLH re: developments and strategy	0.30	247.50
	KLH	Continue review and research related to Plan Confirmation matters; draft memorandum in support of Plan Confirmation	3.70	1,665.00
	KLH	Review and revise Draft Memo in Support of Plan Confirmation; e-mails with DBS and Telephone conference with DBS re: same	1.90	855.00
08/07/2025	KLH	Review responses to Plan Confirmation and meeting with counsel for Committee re: same; draft proposed response	3.20	1,440.00
08/08/2025	DBS	Review and revise draft Confirmation Memorandum	3.50	2,887.50
08/11/2025	MRE	Review of Joinder to Response to Plan Objection and e-mail to D. Salzman and K. Harrison re: revisions to same	0.50	400.00
	KLH	Review DBS revisions to draft Memo in support of Plan Confirmation and e-mail to MRE and DAC re: same; review MRE and DAC e-mail response to same	1.10	495.00
	KLH	Meetings with DBS re: matters related to preparation for		

Plan of Reorganization

			HOURS	
		Plan Confirmation hearing and memo in support of Plan Confirmation	0.80	360.00
	DAC	Review of Plan Proponents Memo in Support of Disclosure and Confirmation, and Reply to Objections; work on drafting of FCR joinder and supporting brief	2.00	1,800.00
	DBS	Final revision of draft Confirmation Brief; correspondence to MRE, DAC, and KLH re: same	1.30	1,072.50
	DBS	Correspondence exchange with M. Wilson re: upcoming hearing issues; meet with KLH re: same	0.30	247.50
08/12/2025	MRE	Review of Joinder to Confirmation brief and e-mail comments to D. Salzman and K. Harrison	0.50	400.00
	DBS	Review DAC and MRE comments to Confirmation Memorandum; review and finalize same; calls with KLH to strategize processing of same	2.20	1,815.00
	DBS	Review Scarcella deposition transcript and Plan Proponent Motion in Limine re: same	1.40	1,155.00
	KLH	Draft proposed response to Plan Objections	2.10	945.00
	KLH	Meeting with DBS re: response to Plan Confirmation objections and related matters	0.60	270.00
	DBS	Meeting with KLH re: response to Plan Confirmation objections and related matters	0.60	495.00
08/13/2025	DBS	Correspondence exchange with M. Wilson and KLH re: confirmation issues	0.20	165.00
	DBS	Meet with KLH re: confirmation issues and strategy	0.50	412.50
	KLH	Finalize response to Objections to Plan and meetings with DBS re: same	2.10	945.00
08/18/2025	KLH	Review filings re: exhibits and witness list for plan confirmation; meeting with DBS re: same	0.80	360.00
08/20/2025	MRE	Telephone conference with D. Salzman re: status of claim	0.10	80.00
	HLJ	Download all pleadings of substance relating to hearing on August 21 and e-mail same to DBS and KLH	0.30	46.50
	DBS	Telephone conference with MRE re: status of claim	0.10	82.50
08/21/2025	HLJ	Telephone conference with DBS re: review of redline versions of Amended Plan, TDP, Trust Agreement and Retained Causes of Action	0.40	62.00
	MRE	Review of TDP amendment and telephone calls with D. Salzman re: status of case	0.50	400.00
	DBS	Review proposed Plan revisions; call with MRE re: same	0.50	412.50
	DBS	Call with J. Bunn re: his client's potential claims and issues	0.30	247.50
	DBS	Calls with MRE re: Plan revisions and hearing outcome	0.40	330.00
	DBS	Calls with KLH re: Plan revisions and hearing outcome	0.50	412.50
	KLH	Calls with DBS re: Plan revisions and hearing outcome	0.50	225.00
08/22/2025	KLH	Review all relevant documents and prepare for hearing on Plan Confirmation on behalf of FCR	4.20	1,890.00
08/25/2025	KLH	Prepare for and attend hearing on Plan Confirmation	8.50	3,825.00

ACCOUNT NO:
STATEMENT NO:

Plan of Reorganization

			HOURS	
08/26/2025	MRE	Review of e-mail from K. Harrison re: Plan hearing update	0.10	80.00
	MRE	Telephone conference with K. Harrison re: confirmation hearing	0.30	240.00
	HLJ	E-mail to KLH re: pleadings filed	0.10	15.50
	KLH	Prepare for and attend Plan Confirmation Hearing and follow up with Local Counsel and Call with MRE re: same	9.20	4,140.00
08/27/2025	MRE	Telephone conference with A. McMillan and T. Phillips re: Plan matters	0.10	80.00
08/29/2025	MRE	Telephone conference with client A. McMillan re: call with Trustees	0.10	80.00
FOR CURRENT SERVICES RENDERED			60.70	33,736.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Douglas A. Campbell	2.00	\$900.00	\$1,800.00
David B. Salzman	13.30	825.00	10,972.50
Heather L. Jiuliente	0.80	155.00	124.00
Kathryn L. Harrison	42.40	450.00	19,080.00
Marla R. Eskin	2.20	800.00	1,760.00

TOTAL CURRENT WORK 33,736.50

BALANCE DUE \$172,852.00

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Page: 1

Hopeman Brother, Inc.

Statement Date: August 31, 2025
Statement No. 3
Account No. 3100.02

Liberty Declaratory Judgment Action

PREVIOUS BALANCE \$36,962.50

			HOURS	
08/07/2025	DBS	Correspondence exchange with insurance counsel re: stay of Motions to Dismiss	0.20	165.00
	DBS	Correspondence exchange with KLH re: developments and strategy	0.20	165.00
	DBS	Correspondence exchanges with insurer and Plan proponents re: Liberty adversary	0.20	165.00
08/12/2025	HLJ	Review of docket in adversary proceeding; collate documents related to adversary complaint and motion to withdraw the reference; create hearing binder re: same	2.10	325.50
08/13/2025	DBS	Prepare for and attend Hopeman Liberty Adversary Status Conference	1.20	990.00
	KM	Drafted Second Monthly Fee Application for C&L for July 2025	0.50	60.00
08/14/2025	HLJ	E-mail to DBS and KLH re: Liberty's Oppositions to Motions to Dismiss	0.10	15.50
	DBS	Begin review of Liberty response to motions to dismiss its adversary complaint; begin researching cited case law	2.50	2,062.50
08/15/2025	DBS	Continue to review Liberty's response to motions to dismiss; review of case law re: same	3.20	2,640.00
08/18/2025	DBS	Preparation for hearing on FCR Motion to Dismiss	6.20	5,115.00
	HLJ	Confer with DBS re: pulling Court opinions from Westlaw; research and find cited opinions/case law	0.40	62.00
	KLH	Various meeting with DBS re: matters related to response to Motion to Withdraw reference (1.1) and draft response to same from FCR	1.90	855.00
	FDR	Meeting with DBS to discuss propriety of FCR as a		

Liberty Declaratory Judgment Action

			HOURS	
defendant in Liberty Mutual suit; research bankruptcy case law on scope of FCR authority and duties.			1.00	475.00
08/19/2025	DAC	Meeting with KH and KLH re: upcoming hearing	0.50	450.00
	DBS	Preparation for Liberty Motion to Dismiss argument	5.00	4,125.00
	HLJ	Research on Westlaw re: case law for August 21st hearing	0.40	62.00
	JCB	Research case law cited in Brief in Opposition to Motion to Dismiss of Liberty Mutual.	5.10	1,402.50
	FDR	Continue research of case law re: duties and powers of future claims representative; meeting with DBS to discuss same.	1.50	712.50
	KLH	Meeting with KH and DAC re: upcoming hearing	0.50	225.00
08/20/2025	DBS	Preparation for hearings on Motion to Dismiss Liberty adversary and miscellaneous related motions	3.50	2,887.50
	JCB	Research case law cited in Brief in Opposition to Motion to Dismiss of Liberty Mutual.	5.40	1,485.00
	JCB	Summarize research re: case law cited in Brief in Opposition to Motion to Dismiss of Liberty Mutual.	0.90	247.50
08/21/2025	DBS	Prepare for and attend hearing on Motions to Dismiss Liberty Adversary and various related motions	5.00	4,125.00
FOR CURRENT SERVICES RENDERED			47.50	28,817.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Douglas A. Campbell	0.50	\$900.00	\$450.00
David B. Salzman	27.20	825.00	22,440.00
Fred D. Rapone	2.50	475.00	1,187.50
Kaitlan Monahan	0.50	120.00	60.00
Heather L. Jiuliantie	3.00	155.00	465.00
Kathryn L. Harrison	2.40	450.00	1,080.00
Joseph C. Bacharach	11.40	275.00	3,135.00

TOTAL CURRENT WORK 28,817.50

BALANCE DUE \$65,780.00

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Page: 1

Hopeman Brother, Inc.

Statement Date: August 31, 2025
Statement No. 3
Account No. 3100.03

Travel

PREVIOUS BALANCE \$14,550.00

			HOURS	
08/20/2025	DBS	Travel to Richmond for hearing on Motion to Dismiss Liberty adversary (1/2 time)	3.20	2,640.00
08/22/2025	DBS	Travel from Richmond hearing to Pittsburgh (1/2 time)	3.00	2,475.00
08/24/2025	KLH	Travel to Richmond for hearing on Plan Confirmation (billed at half time)	3.00	1,350.00
		FOR CURRENT SERVICES RENDERED	9.20	6,465.00

	RECAPITULATION	HOURS	HOURLY RATE	TOTAL
TIMEKEEPER				
David B. Salzman		6.20	\$825.00	\$5,115.00
Kathryn L. Harrison		3.00	450.00	1,350.00

TOTAL CURRENT WORK 6,465.00

BALANCE DUE \$21,015.00

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Page: 1

Hopeman Brother, Inc.

Statement Date: August 31, 2025
Statement No. 3
Account No. 3100.03

PREVIOUS BALANCE	FEES	EXPENSES	ADVANCES	PAYMENTS	BALANCE
3100-00 Costs and Expenses 9,445.32	0.00	2,398.70	0.00	0.00	\$11,844.02
3100-01 Plan of Reorganization 139,115.50	33,736.50	0.00	0.00	0.00	\$172,852.00
3100-02 Liberty Declaratory Judgment Action 36,962.50	28,817.50	0.00	0.00	0.00	\$65,780.00
3100-03 Travel 14,550.00	6,465.00	0.00	0.00	0.00	\$21,015.00
<u>200,073.32</u>	<u>69,019.00</u>	<u>2,398.70</u>	<u>0.00</u>	<u>0.00</u>	<u>\$271,491.02</u>

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