

CAPLIN & DRYSDALE, CHARTERED

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

Counsel for the Official Committee of Unsecured Creditors

MORGAN, LEWIS & BOCKIUS LLP

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

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

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

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

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

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

Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Time Period Covered:	November 1, 2025 through November 30, 2025
Total Fees Requested:	\$14,118.80 (80% of \$17,648.50)
Total Expenses Requested:	\$ 2,122.80



Type of Fee Statement:	Monthly ¹
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Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the “**Local Rules**”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief*, entered September 9, 2024 [Docket No. 162] (the “**Interim Compensation Order**”), Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) for the reasonable and necessary legal services rendered by Morgan Lewis for the period November 1, 2025 through November 30, 2025 (the “**Fee Period**”) and reimbursement of the actual and necessary expenses that Morgan Lewis incurred during the Fee Period. By this Monthly Fee Statement, Morgan Lewis seeks payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$16,241.60, consisting of (i) \$14,118.80, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$2,122.80 for actual and necessary costs and expenses.

Itemization of Services Rendered and Disbursement Incurred

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

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

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

Representations

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

Notice

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

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WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$16,241.60, consisting of (i) \$14,118.80, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$2,122.80 for actual and necessary costs and expenses.

Dated: January 6, 2025

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

ELECTRONICALLY FILED BY:

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

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

Task Code	Matter Description	Hours	Fees Requested
00	General	1.80	936.00
07	Fee Application – Self	1.10	1,160.00
08	Objections – Fee/Retention Applications	0.20	275.00
10	Litigation	4.50	6,975.00
11	Plan & Disclosure Statement	3.20	4,400.00
15	Committee Meetings/Conferences	2.80	3,902.50
<u>TOTAL</u>		<u>13.60</u>	<u>\$17,648.50</u>

EXHIBIT B

Professionals Rendering Services During the Fee Period

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

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S.	Partner	1995	Litigation	\$1,375.00	5.90	\$8,112.50
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	4.80	\$7,440.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	0.20	\$170.00
Shim, David	Associate	2016	Finance	\$1,100.00	0.90	\$990.00
				Total	11.80	\$16,712.50

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

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Guzzi, Tiffany A.	Paralegal	Litigation	\$520.00	1.80	\$936.00
			Total	1.80	\$936.00

EXHIBIT C

Summary of Expenses Incurred During the Fee Period

Type	Expenses
Data Services	\$1,742.80
eData Services	\$380.00
Total	\$ 2,122.80

EXHIBIT D

Invoices

Morgan Lewis

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

Invoice Date: December 11, 2025
Invoice Number 5812117
Account No. 139505-0001

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

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

Re: Hopeman Creditors Committee

Fees	\$	17,648.50
Disbursements	\$	2,122.80
Total Current Period Charges	\$	19,771.30

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

Morgan Lewis

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

Invoice Date: December 11, 2025
Invoice Number 5812117
Account No. 139505-0001

REMITTANCE COPY

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

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

Re: Hopeman Creditors Committee

Fees	\$ 17,648.50
Disbursements	\$ 2,122.80
Total Current Period Charges	\$ 19,771.30

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

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

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

For ACH transfers:
ABA# 031000503
Acct# 2100010985563
Reference account number
Remittance detail address
cashapplication@morganlewis.com

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Invoice Number 5812117
Account No. 139505-0001

Detail for Fee Services Rendered

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
11/03/25	11	Plan & Disclosure Statement	Analyze proposed findings of fact and conclusions of law.	Cox, D.S.	1,375.00	0.40	550.00
11/04/25	15	Committee Meetings/Conferences	Analyze Court's findings and conclusions of law.	Cox, D.S.	1,375.00	1.50	2,062.50
11/04/25	15	Committee Meetings/Conferences	Attend Committee meeting.	Raskin, J. S.	1,550.00	0.30	465.00
11/05/25	11	Plan & Disclosure Statement	Prepare for and conduct videoconference with Caplin team regarding response to proposed findings of fact and conclusions of law.	Cox, D.S.	1,375.00	0.90	1,237.50
11/05/25	10	Litigation	Further analysis of bankruptcy court's proposed findings of facts and conclusions of law on plan confirmation (0.8); conference concerning potential response to bankruptcy court's proposed findings of facts and conclusions of law concerning plan confirmation (0.5).	Raskin, J. S.	1,550.00	1.30	2,015.00
11/07/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
11/10/25	11	Plan & Disclosure Statement	Analyze amendments to plan documents to conform with court order and correspondence to Caplin team regarding same.	Cox, D.S.	1,375.00	0.50	687.50

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
11/10/25	10	Litigation	Analysis and comment concerning issues related to proposed findings of fact and conclusions of law concerning the plan of reorganization (0.6); conference concerning proposed findings of fact and conclusions of law concerning plan of reorganization. (0.6).	Raskin, J. S.	1,550.00	1.20	1,860.00
11/11/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
11/13/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
11/14/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
11/15/25	11	Plan & Disclosure Statement	Analyze and revise modifications of plan documents.	Cox, D.S.	1,375.00	0.40	550.00
11/17/25	08	Objections - Fee/Retention Applications	Analyze fee application and instructions to C. DeSantis regarding same.	Cox, D.S.	1,375.00	0.20	275.00
11/17/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
11/17/25	07	Fee Applications - Self	Correspondence with MLB team regarding the fee orders and payments.	Shim, D. K.	1,100.00	0.50	550.00
11/18/25	15	Committee Meetings/Conferences	Attend committee meeting and related follow-up regarding withdrawal of reference.	Cox, D.S.	1,375.00	1.00	1,375.00
11/18/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
11/18/25	10	Litigation	Communications concerning withdrawal of reference issues.	Raskin, J. S.	1,550.00	0.50	775.00

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
11/18/25	07	Fee Applications - Self	Correspond with MLB team regarding the fee orders and payments.	Shim, D. K.	1,100.00	0.40	440.00
11/19/25	07	Fee Applications - Self	Follow up with UCC counsel regarding October Monthly Fee Statement.	DeSantis, C. M.	850.00	0.20	170.00
11/20/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
11/24/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
11/25/25	11	Plan & Disclosure Statement	Analyze insurer briefing.	Cox, D.S.	1,375.00	1.00	1,375.00
11/25/25	00	General	Evaluate case pleadings and notice of hearing.	Guzzi, T. A.	520.00	0.20	104.00
11/25/25	10	Litigation	Analysis and comment on insurers' objections to bankruptcy's report and recommendation on plan confirmation.	Raskin, J. S.	1,550.00	1.50	2,325.00
Matter Total					13.60	\$ 17,648.50	

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Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	5.90	1,375.00	8,112.50
Raskin, J. S.	4.80	1,550.00	7,440.00
ASSOCIATE			
DeSantis, C. M.	0.20	850.00	170.00
Shim, D. K.	0.90	1,100.00	990.00
PARALEGAL			
Guzzi, T. A.	1.80	520.00	936.00
Matter Total		13.60	\$ 17,648.50

Morgan Lewis

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Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
11/28/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; November; 4.00 User	\$ 380.00
11/28/25	Data Services, Data Services	Data Services Active - R fee; November; 87.14 GB	\$ 1,742.80
Total Disbursements			\$ 2,122.80

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Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Hosting	1,742.80
User Fees	380.00
Total Disbursements	\$ 2,122.80