

**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 of Hopeman Brothers, Inc.*

**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, 28<sup>th</sup> 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)

**SUMMARY COVER SHEET TO THE SIXTH INTERIM FEE APPLICATION  
OF MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL TO  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE INTERIM PERIOD OF SEPTEMBER 1, 2025 THROUGH NOVEMBER 30, 2025**

<b>Basic Information</b>	
Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Petition Date:	June 30, 2024 (the " <b>Petition Date</b> ")
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
<b>Sixth Interim Fee Application</b>	
Sixth Interim Period:	September 1, 2025 through November 30, 2025
Total Hours Billed:	33.10



24324282601150000000000000002

Total Fees Requested:	\$38,456.00
Total Expenses Requested:	\$6,364.40
Blended Rate for All Timekeepers:	\$1,161.81
Blended Rate for Attorneys:	\$1,284.17
Rate Increases Not Previously Approved or Disclosed:	Pursuant to internal operating procedures and past practices, Morgan Lewis adjusts as appropriate its hourly rates on January 1 <sup>st</sup> of each year. The table in this sixth interim fee application labeled "Summary of Professionals Rendering Services for the Sixth Interim Period" reflects the hourly rate increase for professionals and paraprofessionals providing services to the Unsecured Creditors' Committee during the pendency of this case.
Total Professionals:	5
Total Professionals Billing Less Than 15 Hours:	5
<b>Historical</b>	
Fees Approved to Date by Interim Fee Order(s):	\$2,168,974.50
Expenses Approved to Date by Interim Fee Order(s):	\$98,737.63
Total Fees and Expenses Approved to Date:	\$2,267,712.13
Approved Amounts Paid to Date:	\$2,267,712.13
Fees Paid Pursuant to Monthly Statements for the Sixth Interim Period and Not Yet Allowed:	\$0.00
Expenses Paid Pursuant to Monthly Statements for the Sixth Interim Period and Not Yet Allowed:	\$0.00
Total Fees and Expenses Paid Pursuant to Monthly Statements for the Sixth Interim Period and Not Yet Allowed:	\$0.00
This is a(n):	<input type="checkbox"/> Monthly <input checked="" type="checkbox"/> Interim <input type="checkbox"/> Final Application

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

Docket No.	Period Covered	Requested		Paid	
		Fees	Expenses	Fees Paid	Expenses Paid
1256	September 1, 2025 through September 30, 2025	\$7,432.80 (80% of \$9,291.00)	\$2,120.20	\$0.00	\$0.00
1311	October 1, 2025, through October 31, 2025	\$9,213.20 (80% of \$11,516.50)	\$2,121.40	\$0.00	\$0.00

1348	November 1, 2025 through November 30, 2025	\$14,118.80 (80% of \$17,648.50)	\$2,122.80	\$0.00	\$0.00
	<b><u>Total</u></b>	\$30,764.80 (80% of \$38,456.00)	\$6,364.40	\$0.00	\$0.00

**PRIOR INTERIM FEE ORDER(S):**

Docket No.	Period Covered	Requested		Allowed on Interim Basis	
		Fees	Expenses	Fees Allowed	Expenses Allowed
357	July 29, 2024 through August 31, 2024	\$230,210.00	\$90.00	\$230,210.00	\$90.00
558	September 1, 2024 through November 30, 2024	\$958,844.00	\$27,121.23	\$953,744.00 <sup>1</sup>	\$27,121.23
823	December 1, 2024 through February 28, 2025	\$297,566.00	\$43,020.59	\$294,066.00 <sup>2</sup>	\$43,020.59
1127	March 1, 2025 through May 31, 2025	\$221,346.00	\$9,247.56	\$212,113.50 <sup>3</sup>	\$9,247.56
1297	June 1, 2025 through August 31, 2025	\$478,841.00	\$19,258.25	\$478,841.00 <sup>4</sup>	\$19,258.25

**SUMMARY OF PROFESSIONALS RENDERING SERVICES FOR THE SIXTH INTERIM PERIOD:**

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S	Partner	1995	Litigation	\$1,375.00	10.40	\$14,300.00

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

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

<sup>3</sup> \$212,113.50 includes a \$9,232.50 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Fourth Interim Fee Application.

<sup>4</sup> The total compensation requested in the Fifth Interim Fee Application, consisting of fees and expenses, was \$498,099.25. No objections to the Fifth Interim Fee Application were filed, and Morgan Lewis did not receive any informal comments. The *Order Granting the Fifth Interim Fee Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of June 1, 2025 through August 31, 2025* [Docket No. 1297] (the “**Fifth Interim Fee Order**”) contains a typographical error in the statement of the total approved compensation. Specifically, while the Fifth Interim Fee Order lists total approved compensation as \$489,099.25, it correctly approves fees of \$478,841.00 and expenses of \$19,258.25, which together equal \$498,099.25. Morgan Lewis was paid the full amount of \$498,099.25 notwithstanding the typographical error, which will be addressed in Morgan Lewis’s final fee application.

Raskin, Jeffrey S	Partner	1993	Litigation	\$1,550.00	8.80	\$13,640.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	6.80	\$5,780.00
Shim, David K.	Associate	2016	Finance	\$1,100.00	1.80	\$1,980.00
				<b>Total</b>	27.80	\$35,700.00
<b>Non-legal Professional</b>	<b>Position</b>	<b>First Bar Date</b>	<b>Section</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Guzzi, Tiffany	Sr. Paralegal	N/A	Litigation	\$520.00	5.30	\$2,756.00
				<b>Total</b>	5.30	\$2,756.00
				<b>Aggregate Total</b>	33.10	\$38,456.00
<b>Blended Rate for Attorneys:</b>						<b>\$1,284.17</b>
<b>Blended Rate for All Timekeepers:</b>						<b>\$1,161.81</b>

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

Task Code	Matter Description	Hours	Fees Requested
00	General	5.30	\$2,756.00
07	Fee Applications - Self	8.60	\$7,760.00
08	Objections – Fee/Retention Applications	0.20	\$275.00
10	Litigation	10.00	\$15,237.50
11	Plan & Disclosure Statement	6.20	\$8,525.00
15	Committee Meetings/Conferences	2.80	\$3,902.50
<b>TOTAL</b>		33.10	\$38,456.00

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

Type	Expenses
Data Services Active – R	\$5,224.40
User Fees (Monthly) – Relativity	\$1,140.00
<b>Total</b>	<b>\$6,364.40</b>

**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 of Hopeman Brothers, Inc.*

**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, 28<sup>th</sup> 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)

**SIXTH INTERIM FEE APPLICATION OF  
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE INTERIM PERIOD OF SEPTEMBER 1, 2025 THROUGH NOVEMBER 30, 2025**

Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), submits this sixth interim fee application (the “**Fee Application**”) for allowance of compensation for professional services provided in the amount of \$38,456.00 and reimbursement of actual and necessary expenses in the amount of \$6,364.00 incurred during the interim period

from September 1, 2025 through November 30, 2025 (the “**Sixth Interim Period**”). In support of this Fee Application, Morgan Lewis respectfully states as follows:

**Jurisdiction and Venue**

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

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

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

**Background**

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

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

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

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

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

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

[Docket No. 495]. On February 13, 2025, the Court approved the Second Interim Fee Application, allowing compensation for professional services rendered and reimbursement for expenses incurred in the aggregate amount of \$980,865.23.<sup>5</sup>

9. Additionally, on April 14, 2025, Morgan Lewis filed its third interim fee application seeking allowance and compensation for professional services in the amount of \$297,566.00 and reimbursement of actual and necessary expenses in the amount of \$43,020.59 for the period from December 1, 2024 to February 28, 2025 (the “**Third Interim Fee Application**”) [Docket No. 653]. On May 30, 2025, the Court approved the Third Interim Fee Application, allowing compensation for professional services rendered and reimbursement for expenses incurred in the aggregate amount of \$337,086.59.<sup>6</sup>

10. Additionally, on July 16, 2025, Morgan Lewis filed its fourth interim fee application seeking allowance and compensation for professional services in the amount of \$221,346.00 and reimbursement of actual and necessary expenses in the amount of \$9,247.56 for the period from March 1, 2025 to May 31, 2025 (the “**Fourth Interim Fee Application**”) [Docket No. 1031]. On August 19, 2025, the Court approved the Fourth Interim Fee Application, allowing compensation for professional services rendered in the amount of \$212,113.50<sup>7</sup> and reimbursement for expenses incurred in the amount of \$9,247.56.

11. Additionally, on October 16, 2025, Morgan Lewis filed its fifth interim fee application seeking allowance and compensation for professional services in the amount of

---

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

<sup>6</sup> \$337,086.59 includes a \$3,500 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Third Interim Fee Application.

<sup>7</sup> \$212,113.50 includes a \$9,232.50 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Fourth Interim Fee Application.

\$478,841.00 and reimbursement of actual and necessary expenses in the amount of \$19,258.25 for the period from June 1, 2025 to August 30, 2025 (the “**Fifth Interim Fee Application**”) [Docket No. 1245]. On November 17, 2025, the Court approved the Fifth Interim Fee Application, allowing compensation for professional services rendered in the amount of \$478,841.00 and reimbursement for expenses incurred in the amount of \$19,258.25.

12. Morgan Lewis has received payment of the amounts approved by the Court in connection with the First, Second, Third, Fourth, and Fifth Interim Fee Applications. Morgan Lewis has not yet received any payments for the Sixth Interim Period based on the monthly fee statements. Accordingly, and based on those monthly fee statements for the Sixth Interim Period, Morgan Lewis hereby submits this Sixth Interim Fee Application, seeking allowance of compensation for professional services in the amount of \$38,456.00 (inclusive of the 20% holdback) and reimbursement of actual and necessary expenses in the amount of \$6,364.40.

#### **Services Rendered and Disbursements Incurred**

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

- a. advised on insurance-related issues framed by the parties’ briefing to the bankruptcy and district court in the aftermath of the August 2025 contested hearing on the chapter 11 plan co-sponsored by the Committee; and
- b. analyzed insurance issues addressed by the bankruptcy court in its November 2025 recommended findings of fact and conclusions of law with respect to the proposed chapter 11 plan.

14. As set forth in the Retention Application, Morgan Lewis charged for its legal services on an hourly basis in accordance with its ordinary and customary hourly rates,

traditionally adjusted each January 1. These charges included actual, reasonable, and necessary out-of-pocket disbursements incurred in connection therewith. The billing statements, attached as **Exhibit B**, detail the legal services rendered, service dates, personnel involved, time spent, hourly rates, and fees attributable to each service.

15. The Interim Compensation Order authorized the monthly payment of eighty percent (80%) of fees and one hundred percent (100%) of expenses incurred by estate professionals, absent a timely objection upon notice to designated parties. Pursuant to the Interim Compensation Order, and as detailed above, Morgan Lewis filed its monthly fee statements for the Sixth Interim Period, seeking compensation of \$30,764.80 (80% of \$38,456.00) and reimbursement of total expenses incurred in the amount of \$6,364.40.

Through this Fee Application, Morgan Lewis seeks allowance of compensation for professional services in the full amount of \$38,456.00 (inclusive of the 20% holdback) and reimbursement of actual and necessary expenses in the amount of \$6,364.40 incurred during the Sixth Interim Period. During the Sixth Interim Period, Morgan Lewis expended a total 33.10 hours on this matter. Narrative descriptions of the services performed and the time expended during the Sixth Interim Period are provided below, organized by task or proceeding where applicable.

**A. General**

Total Fees: \$2,756.00

Total Hours: 5.30

16. These task codes reflect time spent by Morgan Lewis professionals evaluating various case pleadings.

**B. Committee Meetings/Conferences**

Total Fees: \$3,902.50

Total Hours: 2.80

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

**C. Litigation**

Total Fees: \$15,237.50

Total Hours: 10.00

18. This task code covers time spent by Morgan Lewis professionals on litigation matters related to the Chapter 11 Case, including the analysis of (i) objections to plan confirmation filed in the Chapter 11 Case and (i) briefs relating to Liberty Mutual Insurance Company's appeal filed in the Chapter 11 Case relating to claim allowance.

**D. Plan & Disclosure Statement**

Total Fees: \$8,525.00

Total Hours: 6.20

19. This task code covers time spent by Morgan Lewis professionals on matters relating to the Debtor's Chapter 11 Plan and Disclosure Statement, including analysis, correspondence, and meetings relating to issues concerning the proposed chapter 11 plan and the related proposed findings of facts and conclusions of law.

**E. Fee Applications/Objections<sup>8</sup>**

Total Fees: \$8,035.00

Total Hours: 8.80

20. This task involves time spent by Morgan Lewis professionals on the preparation, review, and filing of monthly fee statements and the Fifth Interim Fee Application. The

---

<sup>8</sup> For ease of description, these tasks have been combined solely for the purpose of this section to include one entry on November 17, 2025 that was inadvertently coded as "Objections – Fee Retention/Applications" instead of "Fee Applications – Self."

complexity of the invoices, resulting from the nature of the insurance-related work, required detailed review of services rendered across various tasks.

**F. Expenses**

21. In addition to the fees incurred above, Morgan Lewis incurred actual and necessary expenses during the Sixth Interim Period totaling \$6,364.40. Included in **Exhibit B** are itemizations, where applicable, of expenses for which Morgan Lewis seeks reimbursement in this Fee Application. All expenses for which reimbursement is sought were incurred on behalf of the Committee and no other person.

**Morgan Lewis's Requested Compensation and Reimbursement Should be Allowed**

22. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court's award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

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

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

23. In determining the reasonableness of a compensation request, courts generally apply the lodestar method. *Boddy v. United States Bankruptcy Court (In re Boddy)*, 950 F.2d 334, 337 (6th Cir. 1991) (“The Supreme Court has made it clear that the lodestar method of fee calculation is the method by which federal courts should determine reasonable attorney’s fees under federal statutes that provide for such fees.”); *Shaw, Licitra, Parente, Esernio & Schwartz, P.Z. v. Travelers Indemnity Co. (In re Grant Associates)*, 154 B.R. 836, 843 (S.D.N.Y. 1993) (noting that the lodestar standard had been adopted by most courts calculating fees under section 330(a), and that “[g]iven the similarity in context and language between the two statutes, the same standard should apply” to fees under section 506(c)); *In re Drexel Burnham Lambert Grp., Inc.*, 133 B.R. 13, 21-22 (Bankr. S.D.N.Y. 1991). Courts calculate the lodestar amount by multiplying the number of hours reasonably expended by the attorney’s reasonable hourly rate. *See Drexel*, 133 B.R. at 22 (citing *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 478 U.S. 546, 565 (1986)). In assessing the reasonableness of a compensation request, there is a “strong presumption” that an attorney is entitled to the lodestar fee. *Id.*

24. Morgan Lewis submits that the compensation for services rendered and reimbursement of expenses incurred during the Sixth Interim Period are reasonable and appropriate based on: (i) the time and labor required; (ii) the complexity of the legal issues

presented; (iii) the skill necessary to perform the legal services; (iv) the customary compensation for such services; and (v) the experience and ability of the attorneys providing these services.

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

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

**Statement Pursuant to Appendix B Guidelines**

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

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

**Response:** No.

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

**Response:** Not applicable.

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

**Response:** No.

**Question:** Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billed records that would not be compensable outside of

bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

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

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

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

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

**Response:** No.

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

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

WHEREFORE, Morgan Lewis requests that the Court enter an order: (a) awarding Morgan Lewis compensation for services rendered during the Sixth Interim Period in the amount of \$38,456.00, and reimbursement of actual, reasonable, and necessary expenses incurred during the Sixth Interim Period in the amount of \$6,364.40 ; (b) authorizing and directing the Debtor to remit payment to Morgan Lewis for such fees and expenses that remain unpaid; and (c) granting any further relief the Court deems just and appropriate under the circumstances.

Dated: January \_\_\_, 2026

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

**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)

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

Under consideration of the *Sixth Interim Fee Application of Morgan, Lewis & Bockius LLP* as *Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of September 1, 2025 through November 30, 2025* (the “Application”);<sup>1</sup> and the Court having reviewed the Application that was served by the Committee, and finding that the Court has

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

jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining that proper and adequate notice has been given and that no other or further notice is necessary; and after due deliberation thereon; and good and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED** as follows:

1. The Application is GRANTED.
2. Morgan Lewis is hereby granted interim allowance of compensation for professional services in the amount of \$44,820.40 for professional services rendered and reimbursement for expenses incurred for the period from September 1, 2025 through November 30, 2025, in the amount of \$38,456.00 in fees and \$6,364.40 in expenses.
3. The Debtor is hereby authorized and directed to remit to Morgan Lewis all unpaid fees and expenses allowed pursuant to this Order.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.
5. This Order shall be immediately effective and enforceable upon its entry.

Dated: \_\_\_\_\_, 2026  
Richmond, Virginia

---

HONORABLE KEITH L. PHILLIPS  
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: \_\_\_\_\_

WE ASK FOR THIS:

CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

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

*Counsel to the Official  
Committee of Unsecured Creditors*

MORGAN, LEWIS & BOCKIUS LLP  
Brady Edwards (admitted *pro hac vice*)  
1000 Louisiana Street, Suite 4000  
Houston, TX 77002-5006  
Telephone: (713) 890-5000  
Facsimile: (713) 890-5001  
Email: [brady.edwards@morganlewis.com](mailto:brady.edwards@morganlewis.com)

W. Brad Nes (admitted *pro hac vice*)  
1717 Main Street, Suite 3200  
Dallas, TX 75201-7347  
Telephone: (214) 466-4000  
Facsimile: (214) 466-4001  
Email: [brad.nes@morganlewis.com](mailto:brad.nes@morganlewis.com)

Jeffrey S. Raskin (admitted *pro hac vice*)  
One Market, Spear Street Tower, 28th Floor  
San Francisco, CA 94105-1596  
Telephone: (415) 442-1000  
Facsimile: (415) 442-1001  
Email: [jeffrey.raskin@morganlewis.com](mailto:jeffrey.raskin@morganlewis.com)

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

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

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

/s/ Jeffrey A. Liesemer

**EXHIBIT A**

**Morgan Lewis Retention Order**

**CAPLIN & DRYSDALE, CHARTERED**

Kevin C. Maclay (admitted *pro hac vice*)  
Todd E. Phillips (admitted *pro hac vice*)  
Jeffrey A. Liesemer (VSB No. 35918)  
Nathaniel R. Miller (admitted *pro hac vice*)  
1200 New Hampshire Avenue NW, 8<sup>th</sup> 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, 28<sup>th</sup> Floor  
San Francisco, CA 94105-1596  
Telephone: (415) 442-1000

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

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

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

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

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

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

**IT IS HEREBY ORDERED THAT:**

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

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

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

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

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

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

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

Oct 4 2024

Dated: \_\_\_\_\_, 2024  
Richmond, Virginia

/s/ Keith L Phillips

---

HONORABLE KEITH L. PHILLIPS  
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: Oct 4 2024

## WE ASK FOR THIS:

## CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

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

*Counsel to the Official  
Committee of Unsecured Creditors*

MORGAN, LEWIS & BOCKIUS LLP  
Brady Edwards (admitted *pro hac vice*)  
1000 Louisiana Street, Suite 4000  
Houston, TX 77002-5006  
Telephone: (713) 890-5000  
Facsimile: (713) 890-5001  
Email: [brady.edwards@morganlewis.com](mailto:brady.edwards@morganlewis.com)

W. Brad Nes (admitted *pro hac vice*)  
1717 Main Street, Suite 3200  
Dallas, TX 75201-7347  
Telephone: (214) 466-4000  
Facsimile: (214) 466-4001  
Email: [brad.nes@morganlewis.com](mailto:brad.nes@morganlewis.com)

Jeffrey S. Raskin (admitted *pro hac vice*)  
One Market, Spear Street Tower, 28<sup>th</sup> Floor  
San Francisco, CA 94105-1596  
Telephone: (415) 442-1000  
Facsimile: (415) 442-1001  
Email: [jeffrey.raskin@morganlewis.com](mailto:jeffrey.raskin@morganlewis.com)

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

**SEEN AND NO OBJECTION:**

/s/ Kathryn Montgomery

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

*United States Trustee*

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

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

/s/ Jeffrey A. Liesemer

**EXHIBIT B**

**Invoices**

**CAPLIN & DRYSDALE, CHARTERED**

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

*Counsel for the Official Committee of Unsecured Creditors*

**MORGAN, LEWIS & BOCKIUS LLP**

Brady Edwards (admitted *pro hac vice*)  
1000 Louisiana Street, Suite 4000  
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, 28<sup>th</sup> 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)

**FOURTEENTH 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 SEPTEMBER 1, 2025 THROUGH SEPTEMBER 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:	September 1, 2025 through September 30, 2025
Total Fees Requested:	\$7,432.80 (80% of \$9,291.00)
Total Expenses Requested:	\$2,120.20

Type of Fee Statement:	Monthly <sup>1</sup>
------------------------	----------------------

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 September 1, 2025 through September 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 \$9,553.00, consisting of (i) \$7,432.80, 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) \$2,120.20 for actual and necessary costs and expenses.

**Itemization of Services Rendered and Disbursement Incurred**

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

---

<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 set forth in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.

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

**Representations**

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

**Notice**

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

*[Remainder of page left blank]*

WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$9,553.00, consisting of (i) \$7,432.80, 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) \$2,120.20 for actual and necessary costs and expenses.

Dated: October 21, 2025

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

**ELECTRONICALLY FILED BY:**

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

*Counsel for the Official Committee of Unsecured Creditors*

**EXHIBIT A**

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

<b>Task Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
00	General	2.30	\$1,196.00
07	Fee Application – Self	3.90	\$3,415.00
10	Litigation	1.60	\$2,480.00
11	Plan & Disclosure Statement	1.60	\$2,200.00
<b><u>TOTAL</u></b>		<b><u>9.40</u></b>	<b><u>\$9,291.00</u></b>

**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	1.60	\$2,200.00
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	1.60	\$2,480.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	3.50	\$2,975.00
Shim, David	Associate	2016	Finance	\$1,100.00	0.40	\$440.00
				<b>Total</b>	<b>7.10</b>	<b>\$8,095.00</b>

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

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

**EXHIBIT C**

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

Type	Expenses
Data Services	\$1,740.20
eData Services	\$380.00
<b>Total</b>	<b>\$2,120.20</b>

**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](http://www.morganlewis.com)  
Fed Tax ID: 23-0891050

Invoice Date: October 16, 2025  
Invoice Number 5775085  
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 September 30, 2025:**

### **Re: Hopeman Creditors Committee**

Fees	\$	9,291.00
Disbursements	\$	2,120.20
<b>Total Current Period Charges</b>	<b>\$</b>	<b>11,411.20</b>

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: October 16, 2025  
Invoice Number 5775085  
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 September 30, 2025:

#### Re: Hopeman Creditors Committee

Fees	\$ 9,291.00
Disbursements	\$ 2,120.20
<b>Total Current Period Charges</b>	<b>\$ 11,411.20</b>

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

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

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

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

# Morgan Lewis

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

## Detail of Outstanding Invoices

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

<b>Invoice Date</b>	<b>Invoice Number</b>	<b>Invoice Amount</b>	<b>Payments/ Credits</b>	<b>Days Outstanding</b>	<b>Balance Due</b>
07/21/25	5717121	135,729.45	0.00	87	135,729.45
08/13/25	5731026	160,484.15	0.00	64	160,484.15
09/10/25	5751080	201,885.65	0.00	36	201,885.65
<b>TOTAL OUTSTANDING</b>					<b>\$ 498,099.25</b>

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

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

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

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

**Morgan Lewis**October 16, 2025  
Page 1Invoice Number 5775085  
Account No. 139505-0001**Detail for Fee Services Rendered**

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
09/02/25	11	Plan & Disclosure Statement	Exchange correspondence with debtor counsel and Liberty Mutual regarding proposed plan language to address Liberty Mutual issues.	Cox, D.S.	1,375.00	0.40	550.00
09/02/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
09/03/25	11	Plan & Disclosure Statement	Analyze proposed findings of facts and conclusions of law and prepare correspondence to Hunton team regarding proposed revisions to same.	Cox, D.S.	1,375.00	0.80	1,100.00
09/04/25	11	Plan & Disclosure Statement	Analyze revisions to proposed findings and exchange correspondence with Hunton and Caplin teams regarding same.	Cox, D.S.	1,375.00	0.40	550.00
09/08/25	07	Fee Applications - Self	Draft Fifth Interim Fee Application.	DeSantis, C. M.	850.00	1.70	1,445.00
09/08/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
09/08/25	07	Fee Applications - Self	Review MLB fifth interim fee application.	Shim, D. K.	1,100.00	0.10	110.00
09/09/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
09/11/25	07	Fee Applications - Self	Revise Fee Application and correspond with K. Cooper and D. Cox regarding same.	DeSantis, C. M.	850.00	0.50	425.00
09/11/25	00	General	Evaluate case pleadings and hearing notices.	Guzzi, T. A.	520.00	0.20	104.00

**Morgan Lewis**October 16, 2025  
Page 2Invoice Number 5775085  
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
09/11/25	10	Litigation	Analyze objection to withdrawal of reference.	Raskin, J. S.	1,550.00	0.70	1,085.00
09/11/25	07	Fee Applications - Self	Correspond with MLB working group regarding MLB's interim fee application and monthly statements.	Shim, D. K.	1,100.00	0.30	330.00
09/16/25	00	General	Evaluate case pleadings and notice of hearing.	Guzzi, T. A.	520.00	0.20	104.00
09/17/25	07	Fee Applications - Self	Telephone conference with D. Shim regarding August monthly fee statement.	DeSantis, C. M.	850.00	0.20	170.00
09/17/25	07	Fee Applications - Self	Revise August monthly fee statement to incorporate comments from UCC.	DeSantis, C. M.	850.00	0.80	680.00
09/17/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
09/18/25	07	Fee Applications - Self	Revise and finalize August monthly fee statement.	DeSantis, C. M.	850.00	0.30	255.00
09/18/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
09/22/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
09/25/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
09/29/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
09/30/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
09/30/25	10	Litigation	Analyze and comment on reply brief in support of objections to withdrawal of the bankruptcy court reference.	Raskin, J. S.	1,550.00	0.90	1,395.00
Matter Total					9.40	\$ 9,291.00	

# Morgan Lewis

October 16, 2025  
Page 3

Invoice Number 5775085  
Account No. 139505-0001

## Summary for Fee Services Rendered

	Hours	Rate	Amount
<b>PARTNER</b>			
Cox, D.S.	1.60	1,375.00	2,200.00
Raskin, J. S.	1.60	1,550.00	2,480.00
<b>ASSOCIATE</b>			
DeSantis, C. M.	3.50	850.00	2,975.00
Shim, D. K.	0.40	1,100.00	440.00
<b>PARALEGAL</b>			
Guzzi, T. A.	2.30	520.00	1,196.00
	<b>Matter Total</b>	<b>9.40</b>	<b>\$ 9,291.00</b>

# Morgan Lewis

October 16, 2025  
Page 4

Invoice Number 5775085  
Account No. 139505-0001

## Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
09/30/25	Data Services, Data Services	Data Services Active - R fee; September; 87.01 GB	\$ 1,740.20
09/30/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; September; 4.00 User	\$ 380.00
Total Disbursements			\$ 2,120.20

# Morgan Lewis

October 16, 2025  
Page 5

Invoice Number 5775085  
Account No. 139505-0001

## Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Hosting	1,740.20
User Fees	380.00
Total Disbursements	\$ 2,120.20

**CAPLIN & DRYSDALE, CHARTERED**

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

*Counsel for the Official Committee of Unsecured Creditors*

**MORGAN, LEWIS & BOCKIUS LLP**

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

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

Jeffrey S. Raskin (admitted *pro hac vice*)  
One Market, Spear Street Tower, 28<sup>th</sup> 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)

**FIFTEENTH 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 OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025**

Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Time Period Covered:	October 1, 2025 through October 31, 2025
Total Fees Requested:	\$9,213.20 (80% of \$11,516.50)
Total Expenses Requested:	\$ 2,121.40

Type of Fee Statement:	Monthly <sup>1</sup>
------------------------	----------------------

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 October 1, 2025 through October 31, 2025 (the “**Fee Period**”) and reimbursement of the actual and necessary expenses that Morgan Lewis incurred during the Fee Period. By this Monthly Fee Statement, Morgan Lewis seeks payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$11,334.60, consisting of (i) \$9,213.20, 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) \$2,121.40 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.

---

<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 set forth in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.

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

**Representations**

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

**Notice**

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

*[Remainder of page left blank]*

WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$11,334.60, consisting of (i) \$9,213.20, 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) \$2,121.40 for actual and necessary costs and expenses.

Dated: November 21, 2025

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

**ELECTRONICALLY FILED BY:**

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

*Counsel for the Official Committee of Unsecured Creditors*

**EXHIBIT A**

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

<b>Task Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
00	General	1.20	\$624.00
07	Fee Application – Self	3.60	\$3,185.00
10	Litigation	3.90	\$5,782.50
11	Plan & Disclosure Statement	1.40	\$1,925.00
<b><u>TOTAL</u></b>		<b><u>10.10</u></b>	<b><u>\$11,516.50</u></b>

**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	2.90	\$3,987.50
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	2.40	\$3,720.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	3.10	\$2,635.00
Shim, David	Associate	2016	Finance	\$1,100.00	0.50	\$550.00
				<b>Total</b>	<b>8.90</b>	<b>\$10,892.50</b>

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	1.20	\$624.00
			<b>Total</b>	<b>1.20</b>	<b>\$624.00</b>

**EXHIBIT C**

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

Type	Expenses
Data Services	\$1,740.40
eData Services	\$380.00
<b>Total</b>	<b>\$ 2,121.40</b>

**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](http://www.morganlewis.com)  
Fed Tax ID: 23-0891050

Invoice Date: November 10, 2025  
Invoice Number 5789214  
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 October 31, 2025:**

### **Re: Hopeman Creditors Committee**

Fees	\$	11,516.50
Disbursements	\$	2,121.40
<b>Total Current Period Charges</b>	<b>\$</b>	<b>13,637.90</b>

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: November 10, 2025  
Invoice Number 5789214  
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 October 31, 2025:

#### Re: Hopeman Creditors Committee

Fees	\$ 11,516.50
Disbursements	\$ 2,121.40
<b>Total Current Period Charges</b>	<b>\$ 13,637.90</b>

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

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

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

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

**Morgan Lewis**November 10, 2025  
Page 1Invoice Number 5789214  
Account No. 139505-0001**Detail for Fee Services Rendered**

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
10/02/25	10	Litigation	Analyze Hopeman appellate brief and confer with J. Raskin regarding same.	Cox, D.S.	1,375.00	1.00	1,375.00
10/02/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
10/02/25	10	Litigation	Analyze and comment on Debtor's appellate brief in response to Liberty Mutual.	Raskin, J. S.	1,550.00	1.20	1,860.00
10/08/25	07	Fee Applications - Self	Correspondence with MLB team regarding fee orders.	Shim, D. K.	1,100.00	0.20	220.00
10/15/25	07	Fee Applications - Self	Revise Fifth Interim Fee App and draft proposed order regarding same.	DeSantis, C. M.	850.00	1.70	1,445.00
10/15/25	07	Fee Applications - Self	Follow up with D. Cox and D. Trigg regarding Fifth Interim Fee App.	DeSantis, C. M.	850.00	0.50	425.00
10/16/25	00	General	Evaluate case pleadings and notices of hearings.	Guzzi, T. A.	520.00	0.20	104.00
10/17/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
10/20/25	10	Litigation	Analyze Liberty reply brief in support of appeal.	Cox, D.S.	1,375.00	0.50	687.50
10/20/25	07	Fee Applications - Self	Review and revise monthly fee statement.	DeSantis, C. M.	850.00	0.40	340.00
10/20/25	07	Fee Applications - Self	Correspond with B. Edwards and D. Cox regarding Fourteenth Fee Statement.	DeSantis, C. M.	850.00	0.20	170.00
10/20/25	00	General	Evaluate case pleadings and hearing notice.	Guzzi, T. A.	520.00	0.20	104.00

# Morgan Lewis

November 10, 2025  
Page 2

Invoice Number 5789214  
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
10/20/25	07	Fee Applications - Self	Analyze amended plan and correspondence with C. DeSantis regarding MLB's fee application.	Shim, D. K.	1,100.00	0.30	330.00
10/21/25	07	Fee Applications - Self	Finalize monthly fee statement.	DeSantis, C. M.	850.00	0.30	255.00
10/22/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
10/29/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
10/31/25	11	Plan & Disclosure Statement	Analyze bankruptcy court decision approving Plan.	Cox, D.S.	1,375.00	1.40	1,925.00
10/31/25	10	Litigation	Analyze Judge Phillips' report and recommendation concerning plan confirmation.	Raskin, J. S.	1,550.00	1.20	1,860.00
Matter Total					10.10	\$ 11,516.50	

# Morgan Lewis

November 10, 2025  
Page 3

Invoice Number 5789214  
Account No. 139505-0001

## Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	2.90	1,375.00	3,987.50
Raskin, J. S.	2.40	1,550.00	3,720.00
ASSOCIATE			
DeSantis, C. M.	3.10	850.00	2,635.00
Shim, D. K.	0.50	1,100.00	550.00
PARALEGAL			
Guzzi, T. A.	1.20	520.00	624.00
	Matter Total	10.10	\$ 11,516.50

# Morgan Lewis

November 10, 2025  
Page 4

Invoice Number 5789214  
Account No. 139505-0001

## Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
10/31/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; October; 4.00 User	\$ 380.00
10/31/25	Data Services, Data Services	Data Services Active - R fee; October; 87.07 GB	\$ 1,741.40
Total Disbursements			\$ 2,121.40

# Morgan Lewis

November 10, 2025  
Page 5

Invoice Number 5789214  
Account No. 139505-0001

## Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Hosting	1,741.40
User Fees	380.00
Total Disbursements	\$ 2,121.40

**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, 28<sup>th</sup> 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 <sup>1</sup>
------------------------	----------------------

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.

---

<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 set forth in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.

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

**Representations**

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

**Notice**

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

*[Remainder of page left blank]*

WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$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**

<b>Task Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
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
<b><u>TOTAL</u></b>		<b><u>13.60</u></b>	<b><u>\$17,648.50</u></b>

**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
				<b>Total</b>	<b>11.80</b>	<b>\$16,712.50</b>

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
			<b>Total</b>	<b>1.80</b>	<b>\$936.00</b>

**EXHIBIT C**

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

Type	Expenses
Data Services	\$1,742.80
eData Services	\$380.00
<b>Total</b>	<b>\$ 2,122.80</b>

**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](http://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
<b>Total Current Period Charges</b>	<b>\$</b>	<b>19,771.30</b>

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
<b>Total Current Period Charges</b>	<b>\$ 19,771.30</b>

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

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

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

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

**Morgan Lewis**December 11, 2025  
Page 1Invoice 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

**Morgan Lewis**December 11, 2025  
Page 2Invoice Number 5812117  
Account No. 139505-0001

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

**Morgan Lewis**December 11, 2025  
Page 3Invoice Number 5812117  
Account No. 139505-0001

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

# Morgan Lewis

December 11, 2025  
Page 4

Invoice Number 5812117  
Account No. 139505-0001

## Summary for Fee Services Rendered

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

# Morgan Lewis

December 11, 2025  
Page 5

Invoice Number 5812117  
Account No. 139505-0001

## 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

# Morgan Lewis

December 11, 2025  
Page 6

Invoice Number 5812117  
Account No. 139505-0001

## 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