

REAVES PLLC

Michael G. Wilson (VSB No. 48927)
555 Belaire Avenue, Suite 300
Chesapeake, VA 23320
Telephone: (804) 614-8301
mike.wilson@reavescoley.com

CAMPBELL & LEVINE, LLC

David B. Salzman (admitted *pro hac vice*)
Kathryn L. Harrison (admitted *pro hac vice*)
310 Grant Street, Suite 1700
Pittsburgh, PA 15219
Telephone: (412) 261-0310
dsalzman@camlev.com
kharrison@camlev.com

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

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

IN RE:)	
)	
HOPEMAN BROTHERS, INC.,)	Case No. 24-32428-KLP
)	
DEBTOR.)	
)	

**SUMMARY OF FIRST QUARTERLY FEE
APPLICATION OF CAMPBELL & LEVINE, LLC
AS COUNSEL TO THE FUTURE CLAIMANTS' REPRESENTATIVE
FOR THE PERIOD FROM MAY 15, 2025 THROUGH AUGUST 31, 2025**

Basic Information	
Name of Applicant:	Campbell & Levine, LLC
Name of Client:	Future Claimants' Representative (the "FCR")
Date of Retention:	June 18, 2025, effective as of May 15, 2025
This Interim Application	
Time Period Covered:	May 15, 2025 through August 31, 2025
Total Hours Billed:	426.5
Total Fees Requested:	\$259,647.00
Total Expenses Requested:	\$11,844.02
Type of Fee Statement:	First Quarterly Fee Application in accordance with the Interim Compensation Order
Fees Requested Over Budget:	None



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Rate Increases Not Previously Approved/Disclosed:	None
Blended Rate:	\$608.79
Total Professionals:	11
Total Professionals Billing Less than 15 Hours	6
Historical Applications	
Fees Approved to Date by Interim Order:	\$0
Expenses Approved to Date by Interim Order:	\$0
Fees Paid Pursuant to Monthly Statements but Not Yet Allowed:	\$207,717.60
Expense Paid Pursuant to Monthly Statements, but Not Yet Allowed:	\$11,844.02

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

IN RE:)	
)	
HOPEMAN BROTHERS, INC.,)	Case No. 24-32428-KLP
)	
DEBTOR.)	
)	

**FIRST QUARTERLY FEE APPLICATION OF
CAMPBELL & LEVINE, LLC AS COUNSEL TO
THE FUTURE CLAIMANTS' REPRESENTATIVE FOR
THE PERIOD FROM MAY 15, 2025 THROUGH AUGUST 31, 2025**

AND NOW, comes Campbell & Levine, LLC ("C&L"), counsel to Marla Rosoff Eskin, Esq., Future Claimants' Representative (the "FCR"), and submits this First Quarterly Fee Application (this "Application") for the Period from June 1, 2025 through August 31, 2025 (the "Application Period"), seeking allowance of professional fees incurred and reimbursement of actual and necessary expenses incurred by C&L during the Application Period pursuant to 11 U.S.C. §§330 and 331, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Local of Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the Eastern District of Virginia, and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retainer Professionals and (II) Granting Related Relief* entered

on September 9, 2024 [Docket No. 162] (the “Interim Compensation Order”), and avers as follows.

I. Jurisdiction, Venue, and Predicate for Relief

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157. The FCR consent to the entry of a final order by this Court, consistent with Article III of the United States Constitution. Venue is proper in this district pursuant to 28 U.S.C. §§1408 and 1409.

2. The FCR and C&L request relief pursuant to Sections 330 and 331 of the United States Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and Rule 2016-1 of the Local Rules of Bankruptcy Procedure for this Court.

II. Background

3. On June 30, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

4. The Debtor continues to manage its business as debtor in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee has been appointed in this chapter 11 case.

5. On July 22, 2024, the Office of the United States Trustee for the Eastern District of Virginia (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors (the “Committee”) [Docket No. 69].

6. On September 9, 2024, the Court entered the Interim Compensation Order, which approved the compensation procedures set forth therein (the “Compensation Procedures”).

7. On June 18, 2025, the Court entered the Order Authorizing the Retention and Employment of Campbell & Levine, LLC as Counsel to Marla Rosoff Eskin, Esq., Future Claimants’ Representative, effective as of the Petition Date.

8. Pursuant to the Compensation Procedures, professionals retained in this case are authorized to file monthly fee statements and serve such statements on the Notice Parties (as defined in the Compensation Procedures). Provided that no objection to a monthly fee statement is timely filed, the Debtor is authorized to pay such professional an amount equal to eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such monthly fee statement.

9. Additionally, pursuant to the Compensation Procedures, beginning with the period ending on August 31, 2024, and at three-month intervals thereafter, professionals retained in this case are authorized to file interim fee applications with the Court. The Compensation Procedures provide that the fifth interim fee application should cover the period from May 15, 2025 through and including August 31, 2025.

10. The Compensation Procedures also provide that all Retained Professionals (as defined in the Compensation Procedures), to the extent applicable, shall make reasonable efforts to comply with the U.S. Trustee's requests for information and additional disclosures set forth in 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 (the "Appendix B Guidelines") in connection with the interim and final fee applications filed in this case.

III. Relief Requested

11. C&L submits this Application (a) for interim allowance of reasonable compensation for the actual, reasonable and necessary professional services that it has rendered as counsel for the FCR in this case for the period from May 15, 2025, through and including August 31, 2025, and (b) for reimbursement of actual, reasonable and necessary expenses incurred in representing the FCR during that same period. For the period covered by this Application, C&L

seeks the remaining 20% of fees for services rendered in the amount of \$51,929.40. For the same period, C&L seeks actual, reasonable and necessary expenses totaling \$0.00.

IV. Basis for Relief Requested

12. During this Application Period, the FCR and its counsel have participated in plan confirmation process and adversary actions brought against the FCR by various of the Debtor's insurers.

13. Pursuant to the terms of the Interim Compensation Order, C&L properly filed and served three Monthly Statements during the Fifth Interim Application Period as follows:

Period Covered by Monthly Statement	Total Fees	Total Expenses	Date Served and Docket No.	Objection Deadline	Amount of Fees Received (80%)	Amount of Expenses Received (100%)
May 15, 2025 – June 30, 2025	\$132,482.50	\$5,531.24	07/16/2025 [Dkt. No. 1027]	07/30/2025	\$105,986.00	\$5,531.24
July 1, 2025 – July 31, 2025	\$58,145.50	\$3,914.08	08/14/2025 [Dkt. No. 1106]	08/28/2025	\$46,516.40	\$3,914.08
August 1, 2025 – August 31, 2025	\$69,019.00	\$2,398.70	09/15/2025 [Dkt. No. 1196]	09/29/2025	\$55,215.20	\$2,398.70

14. In accordance with the Compensation Procedures, as set forth in the Interim Compensation Order, and as set forth in Local Rule 2016-1, the Monthly Statements included (i) a detailed itemization of the service hours expended by matter and professional and (ii) a summary schedule of hours and fees categorized by project code. The Monthly Statements also included a detailed chronological itemization of the services rendered by each professional and paraprofessional, calculated by tenths of an hour and categorized in accordance with the

appropriate project code. As set forth above, a copy of C&L's Monthly Statements are attached hereto as Exhibit D.

15. No agreement or understanding exists between C&L and any other person for the sharing of compensation received or to be received for services rendered in or in connection with this case.

V. Statement Pursuant to Appendix B Guidelines

16. The following is provided in response to the questions set forth in ¶C.5 of the Appendix B Guidelines:

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? If so, please explain.

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 by 10% or more, did you discuss the reasons for the variation with the client?

Response: Yes. Moreover, the fees incurred related to Plan Confirmation and Adversary Actions for this Period are in excess of the budget. However, the overall fees incurred to date are significantly less than the budget.

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 this fee application include time or fees related to reviewing the time records or preparing, reviewing, or revising of invoices. If so, please quantify by hours and fees.

Response: This Application includes fees for minimal time for review of billing records, but only related to the preparation of fee applications.

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

Response: This Application does not include any additional time for redacting of billing records aside from a review of billing records related to the preparation of fee applications.

Question: If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your 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?

Answer: This Application did not include any rate increases.

VI. Notice

17. Notice of this Application has been provided to all necessary parties in accordance with the Interim Compensation Order.

[REMAINDER INTENTIONALLY BLANK]

WHEREFORE, C&L requests entry of an order (i) granting interim approval of the reasonable fees incurred by C&L during the Application Period in the amount of \$259,647.00 and reimbursement of expenses in the amount of \$11,844.02, (ii) directing the Debtor to pay to C&L \$51,929.40, which is the remaining 20% of the fees incurred during the Application Period, and (iii) granting to C&L such other and further relief as is just and proper.

Dated: January 27, 2026

Respectfully submitted,

/s/ Michael G. Wilson

Michael G. Wilson (VSB No. 48927)

REAVES PLLC

555 Belaire Avenue, Suite 300

Chesapeake, Virginia 23320

Telephone: (804) 614-8301

Email: mike.wilson@reavescoley.com

- and -

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CAMPBELL & LEVINE, LLC

310 Grant Street, Suite 1700

Pittsburgh, Pennsylvania 15219

Telephone: (412) 261-0310

Email: dsalzman@camlev.com

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Counsel to Marla Rosoff Eskin, Esq.,

Future Claimants' Representative

EXHIBIT A

Statement of Fees by Subject Matter During the Application Period

Task Code	Matter Description	Hours	Fees Requested
.01	Plan of Reorganization	287.4	\$172,852.00
.02	Liberty Mutual Declaratory Judgment Action	110.9	\$65,780.00
.03	Travel	28.2	\$21,015.00
TOTAL		426.5	\$263,647.00

EXHIBIT B

Professionals Rendering Services During the Fee Period

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

Professional	Position	Hourly Billing Rate	Total Hours Billed	Total Compensation
Douglas A. Campbell	Member	\$900.00	4.4	\$3,960.00
David B. Salzman	Member	\$825.00	190.5	\$157,162.50
Marla R. Eskin	Member	\$800.00	19.4	\$15,520.00
Paul J. Cordaro	Member	\$625.00	1.0	\$625.00
Shannon M. Clougherty	Member	\$550.00	6.9	\$3,795.00
Kathryn L. Harison	Member	\$450.00	116.9	\$52,605.00
Fred D. Rapone	Counsel	\$475.00	18.9	\$8,977.50
Joseph C. Bacharach	Associate	\$275.00	53.4	\$14,685.00
Heather L. Jiuliente	Paralegal	\$155.00	14.2	\$2,201.00
Theresa M. Matiasic	Paralegal	\$140.00	0.4	\$56.00
Kaitlan A. Monahan	Paralegal	\$120.00	0.5	\$60.00
Total			426.5	\$259,647.00
	Blended Rate	\$608.79		

EXHIBIT C

Summary of Expenses

Type	Amount
Travel Related Expenses	\$7,241.98
Westlaw/Pacer and Related Office Expenses	\$4,602.04

EXHIBIT D

Statements for May 15, 2025 through August 31, 2025

Page: 1

Hopeman Brother, Inc.

Statement Date: June 30, 2025
Statement No. 1
Account No. 3100.00

Costs and Expenses

05/12/2025	MRE - Transportation from Airport to Court House in Richmond, Virginia	39.00
05/13/2025	MRE - Transportation from Court House to airport in Richmond, Virginia	29.82
05/13/2025	MRE - Meal at airport in for hearing in Richmond, Virginia	14.12
05/13/2025	Parking at airport in Philadelphia, PA for hearing in Richmond, VA - May 13, 2025	37.00
05/27/2025	MRE - Flight from Philadelphia to Richmond for Avon on 5/12/2025	723.72
05/27/2025	MRE - Return flight to Philadelphia from Richmond for Avon on 5/13/2025	320.48
05/27/2025	DBS - Delta Airlines flight to Richmond, VA on 5/12/25	528.48
05/27/2025	DBS - Travel expense in Richmond, VA on 5/12/25	34.79
05/27/2025	DBS - Travel expense in Richmond, VA on 5/13/25	45.05
05/27/2025	DBS - Meal expense in Richmond, VA on 5/12/25	23.69
05/27/2025	DBS - Meal expense in Richmond, VA on 5/13/25	31.32
05/27/2025	DBS - Travel expense in Richmond, VA on 5/14/25	46.10
05/27/2025	DBS - Meal expense in Richmond, VA on 5/14/25	11.56
05/27/2025	DBS - Lodging expense in Richmond, VA on 5/12/25 through 5/14/25	593.18
05/27/2025	DBS - Mileage from Pittsburgh to Richmond and back - 5/20/25 and 5/22/25	509.40
05/27/2025	DBS - Toll expense from Pittsburgh to Richmond and back - 5/20/25 and 5/22/25	38.24
05/27/2025	DBS - Lodging expense in Richmond - 5/20/25-5/22/25	693.42
05/27/2025	DBS - Airline expense from Richmond to Pittsburgh - 5/14/25	407.18
05/30/2025	Pacer Charges for May, 2025	14.10
05/31/2025	Westlaw charges for May, 2025	15.53
06/09/2025	DBS - Lodging expense - 5/12/25-5/14/25	593.18
06/30/2025	Pacer charges for June, 2025	13.10
06/30/2025	Westlaw charges for June, 2025	221.14
06/30/2025	DBS - Mileage from Pittsburgh to Richmond and back - 5/12/25	

06/30/2025	and 5/14/25	509.40
	DBS - Toll expense from Pittsburgh to Richmond and back -	
	5/12/25 and 5/14/25	<u>38.24</u>
	TOTAL EXPENSES	5,531.24
	TOTAL CURRENT WORK	5,531.24
	BALANCE DUE	<u>\$5,531.24</u>

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

Page: 1

Hopeman Brother, Inc.

Statement Date: June 30, 2025
Statement No. 1
Account No. 3100.01

Plan of Reorganization

			HOURS	
05/02/2025	DBS	Extended call with MRE re: Hopeman	0.70	577.50
05/05/2025	HLJ	Retrieve numerous dockets and pleadings from various bankruptcy/Trust cases re: appointment of FCR for DBS	0.40	62.00
05/06/2025	DBS	Review materials provided by Kaplan; calls with MRE re: same; calls with Todd Phillips	5.50	4,537.50
05/07/2025	DBS	Prepare for and attend MRE's deposition; calls with MRE	3.00	2,475.00
	MRE	Meeting with counsel prior to deposition, participate in deposition and follow-up to same	3.00	2,400.00
05/08/2025	HLJ	Multiple telephone calls with DBS re: Pro Hac Vice admission in the USBC for the Eastern District of Virginia	0.20	31.00
	HLJ	Search and review local rules re: pro hac vice admission	0.20	31.00
	HLJ	Prepare Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(3); e-mail application to DBS	0.30	46.50
05/13/2025	DBS	Prepare for and attend FCR appointment hearing	5.00	4,125.00
	DBS	Meet with Debtor's counsel re: case background, schedule, issues presented	0.80	660.00
	DBS	Meet with MRE re: case strategy	1.50	1,237.50
	DBS	Call with KLH re: case overview and next steps	0.60	495.00
05/14/2025	DBS	Call with potential local counsel	0.40	330.00
	DBS	Review Plan/Disclosure Statement and exhibits; call with FCR re: findings	5.50	4,537.50
	HLJ	Confer with KLH re: Application to Engage FCR; search Eastern District of VA for samples of same; e-mail to KLH re: same	0.50	77.50
05/15/2025	HLJ	Telephone conference with DBS re: Trust Agreement		

Plan of Reorganization

			HOURS	
		comparison and copy of TDP	0.20	31.00
	HLJ	E-mail to DBS with copy of TDP	0.10	15.50
	HLJ	Create comparison Trust Agreement and e-mail same to DBS	0.30	46.50
	DBS	Correspondence exchanges with potential local counsel	0.10	82.50
	DBS	Continued analysis of draft TDP and Trust Agreement; call with FDR re: same	2.50	2,062.50
	MRE	Review TDP and Trust Agreement	1.50	1,200.00
	KLH	Draft Application to Engage C&L as counsel to the FCR	0.50	225.00
	KLH	Emails with local counsel re: matters related to pro hac and local rules for engagement	0.20	90.00
	KLH	Review emails from DBS and TC with DBS re: C&L role in FCR and matters related to Plan and D/S hearing	0.50	225.00
05/16/2025	MRE	Telephone conference with D. Salzman re: TDP and Trust Agreement	0.60	480.00
	DBS	Continued review of case related filings and documents; call with MRE re: Plan analysis and issues presented	3.20	2,640.00
	DBS	Correspondence exchange with Creditors' Committee counsel; prepare for and participate in Zoom meeting with same	1.10	907.50
05/19/2025	HLJ	Prepare Motion for Pro Hac Vice Admission for KLH and Application to Qualify as Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(3); e-mail same to KLH for review	1.00	155.00
	HLJ	Retrieve all objections to Plan and Disclosure Statement from court docket; e-mail same to DBS and KLH	0.30	46.50
	DBS	Prepare for and attend conference call with Debtor counsel and meet with Committee counsel re: preparation for Solicitation Motion hearing	0.90	742.50
05/20/2025	KLH	Review D/S and Plan; various documents related to Plan in preparation for meeting with DBS and hearing on same	2.10	945.00
	KLH	E-mails with M. Wilson and Telephone conference with DBS re: matters related to hearing on D/S	1.10	495.00
	DBS	Preparation for Solicitation Motion hearing	2.00	1,650.00
	DBS	Review and analyze materials re: Hopeman insurance coverage	1.00	825.00
	DBS	Call with KLH re: case issues and strategy; discussions with M. Wilson re: same	0.40	330.00
05/21/2025	MRE	Telephone conference with D. Salzman re: hearing	0.10	80.00
	DBS	Prepare for and attend hearing on Solicitation Motion	4.50	3,712.50
	DBS	Call to MRE re: Solicitation Motion outcome	0.10	82.50
	KLH	Review Plan, D/S, and relevant documents in case related to FCR position	3.30	1,485.00
05/22/2025	MRE	Telephone conference with D. Salzman re: hearing	0.30	240.00
	MRE	Telephone conference with S. Clougherty re: summarizing TDP and Trust Agreement and e-mail to J. Bacharach re: same	0.30	240.00

Plan of Reorganization

			HOURS	
	SMC	Call with MRE re: summarizing TDP and Trust Agreement, contemplated for Plan; e-mail exchange and call with J. Bacharach re: summarizing documents, prepare and send examples.	0.50	275.00
	JCB	Summarize Trust Agreement.	0.80	220.00
	DBS	Call with MRE re: hearing outcome, case issues, and strategy	0.30	247.50
05/27/2025	JCB	Summarize Trust Agreement.	1.70	467.50
05/29/2025	MRE	Review of TDP	0.40	320.00
	MRE	Telephone conference with D. Salzman	0.10	80.00
	MRE	Review of e-mail from L. David re: discovery and brief review of discovery demands	0.10	80.00
	JCB	Summarize Trust Agreement	1.90	522.50
	KLH	Review discovery requests to MRE and TC with DBS re: same	0.90	405.00
	KLH	Review discovery requests to MRE and TC with DBS re: same	0.60	270.00
	DBS	Call with MRE re: Plan objections and strategy	0.10	82.50
05/30/2025	MRE	Telephone conference with T. Phillips and A. McMillan re: trustee selection	0.20	160.00
	MRE	Telephone conference with D. Salzman re: possible deposition	0.20	160.00
	JCB	Summarize Trust Agreement	1.20	330.00
	JCB	Summarize TDP	4.40	1,210.00
	KLH	Review discovery requests to MRE; begin draft response to same	1.10	495.00
	DBS	Call with MRE re: possible deposition	0.20	165.00
05/31/2025	MRE	Review of e-mail from A. McMillan re: release and e-mail to S. Clougherty re: same	0.10	80.00
	MRE	E-mail to D. Salzman re: deposition dates	0.10	80.00
	SMC	E-mail exchange with MRE re: draft Hopeman release.	0.10	55.00
06/01/2025	MRE	Review of Disclosure Statement	1.00	800.00
06/02/2025	FDR	Review and analyze draft release for Hopeman trust claims; e-mail to DBS re: same.	0.40	190.00
	MRE	Telephone conference with K. Harrison and D. Salzman re: Disclosure Statement and Plan	1.00	800.00
	FDR	E-mail copies of compare documents of OC and WRG release to Hopeman draft release to SMC	0.20	95.00
	SMC	E-mail exchange with FDR re: comparison of releases; review same; e-mail and call with MRE re: Trust Agreement and TDP summaries; confer with J. Bachrach re: same.	0.70	385.00
	DBS	Call with N. Miller re: case developments	0.30	247.50
	DBS	Review Disclosure Statement and Plan and attendant documents to ensure appropriate finalization	4.00	3,300.00
	KLH	Telephone conference with MRE and DBS re: matters related to MRE deposition and response to discovery		

Plan of Reorganization

				HOURS	
		requests from insurers		1.00	450.00
	DBS	Call with MRE and KLH re: case strategy		1.00	825.00
06/03/2025	MRE	Telephone conference with D. Salzman re: pending matters		0.30	240.00
06/04/2025	MRE	Review of Trustee information		0.10	80.00
06/05/2025	KLH	Review Plan and D/S and related documents for responses to Discovery and matters related to feasibility and fairness of Plan and D/S		3.10	1,395.00
06/06/2025	SMC	Review of Trust Agreement and TDP summaries; e-mail to TMM re: same; e-mail to MRE re: same; call to J. Bacharach re: edits to summaries and finalizing same; review of e-mail from MRE re: release language; review same and respond.		1.30	715.00
	MRE	Review of revisions to Plan documents, telephone call with D. Salzman re: same and e-mails with S. Clougherty and D. Salzman re: same		0.40	320.00
	TMM	Review e-mails from SMC re: preparing comparisons of the Trust Agreement outline and TDP Summary; prepare comparisons and e-mail to SMC		0.40	56.00
	JCB	Revise summaries of TDP and Trust Agreement.		2.30	632.50
	DBS	Review correspondence from A. McMillan and analyze position asserted		0.50	412.50
	DBS	Call with MRE re: case developments		0.20	165.00
	DBS	Call with KLH re: discovery issues created by insurer interrogatories to FCR		0.30	247.50
06/09/2025	SMC	Prepare for and participate in meeting with J. Bacharach re: TDP and Trust Agreement summaries; review TDP.		0.80	440.00
	DBS	Call with N. Miller re: case developments		0.10	82.50
	DBS	Correspond with T. Phillips re: discovery requests to FCR		0.10	82.50
	KLH	Draft responses to Discovery Requests of Chubb and Travelers; Telephone conference with DBS re: same and follow up with DBS re: same		3.90	1,755.00
	DBS	Review Plan Supplement		1.30	1,072.50
06/10/2025	DBS	Review and analyze Chubb and Travelers Interrogatories; meet with KLH re: same		1.50	1,237.50
	DBS	Review and revise draft Chubb and Traveler Discovery Objections and Responses		1.20	990.00
	DBS	Call with N. Miller to discuss case developments		0.10	82.50
	SMC	E-mail exchange with J. Bacharach re: TDP and Trust Agreement summaries; review and edit summaries; e-mail with MRE re: same; send to MRE; send to J. Bacharach; consult various other TDP and Trust Agreement documents.		3.50	1,925.00
06/11/2025	DBS	Call with MRE re: case developments and strategy		1.00	825.00
	DBS	Call with KLH re: case developments and strategy		0.50	412.50
	DBS	Meet with KLH re: case issues		0.30	247.50
	DBS	Call with Debtor and Committee counsel re: discovery			

Plan of Reorganization

			HOURS	
		issues	0.60	495.00
	KLH	Various meetings/TC with DBS re: matters related to Plan language; review Plan language re: payment of claims and consider same; discuss with DBS	2.90	1,305.00
	MRE	Telephone conference with D. Salzman, review of Answers to Interrogatories and e-mail to K. Harrison and D. Salzman re: same	1.40	1,120.00
06/12/2025	MRE	Review of revised discovery responses and e-mails with K. Harrison re: same	0.20	160.00
	MRE	Telephone conference with D. Salzman and K. Harrison re: discovery	0.20	160.00
	MRE	Review of further revised discovery responses and e-mail to K. Harrison re: same	0.30	240.00
	DBS	Finalize FCR discovery responses; meet with KLH re: same; calls with MRE re: same	2.50	2,062.50
	KLH	Revisions to Draft Discovery responses to Chubb and Travelers per DBS; various e-mails and Telephone conference with DBS and e-mails with MRE re: finalizing same	1.90	855.00
06/13/2025	MRE	Review of further revised discovery responses and e-mails with K. Harrison re: same	0.30	240.00
	KLH	Finalize Responses to Chubb and Travelers Discovery Requests; various e-mails with MRE and DBS re: same; service of Discovery responses on Chubb and Travelers	1.30	585.00
06/16/2025	MRE	Telephone conference with D. Salzman re: pending matters	0.30	240.00
	DBS	Update call with FCR re: confirmation issues and strategy	0.30	247.50
	DBS	Call with KLH re: upcoming hearing strategy	0.30	247.50
	KLH	Call with DBS re: case developments	0.30	135.00
06/17/2025	MRE	Telephone conference with D. Salzman re: expert reports	0.20	160.00
	DBS	Call with N. Miller re: case developments; begin review and analysis of Committee, Debtor, and Insurer expert reports; call with MRE re: same	2.00	1,650.00
06/18/2025	MRE	Review of TDP revision re: audit and telephone call with D. Salzman re: same	0.20	160.00
	MRE	Review of e-mail from Liberty Mutual re: amended complaint and e-mail to K. Harrison and D. Salzman re: same	0.10	80.00
	MRE	Review of e-mail from K. Hemming re: hearing update	0.10	80.00
	DBS	Review hearing agenda; call with KLH to review FCR positions re: same and discuss Liberty claim	0.40	330.00
	DBS	Correspondence exchange with Committee counsel re: proposed UST language addition to TDP; call with FDR re: same	0.50	412.50
	DBS	Review amended Liberty Complaint; correspondence exchange with FDR re: strategy re: same	0.90	742.50
	KLH	Prepare for and attend hearings on various matters; meeting with local counsel and follow up with MRE and DBS re: outcome of hearings	4.20	1,890.00

Plan of Reorganization

			HOURS	
06/19/2025	FDR	Create PowerPoint slide deck of Expert Reports; e-mail same to DBS	1.00	475.00
	DBS	Continued analysis of party expert reports; prepare for upcoming depositions	3.50	2,887.50
	DBS	Review Chubb Motion for Continuance and supporting filings	0.60	495.00
	DBS	Call with KLH re: Omnibus Hearing coverage	0.20	165.00
	KLH	Travel from Richmond for hearings	6.00	2,700.00
	KLH	Call with DBS re: Omnibus hearing coverage	0.20	90.00
06/20/2025	DBS	Review Orders granting Motion for Expedited Hearing; call with KLH to coordinate virtual appearance; correspondence exchange with local counsel to facilitate same	0.50	412.50
	DBS	Call with FDR to coordinate assembly of data for preparation of analysis for FCR	0.50	412.50
	DBS	Review Motion to Quash Subpoena by Creditors Committee	0.30	247.50
	FDR	Call with DBS re: Expert report analysis	0.50	237.50
	KLH	Draft Objection to Chubb Motion for Continuance	1.50	675.00
06/23/2025	MRE	Review of Motion to Adjourn Confirmation Hearing, review of draft Objection and telephone call with D. Salzman re: same	0.60	480.00
	HLJ	Run comparison of Amended Complaint to Complaint in Liberty Mutual v. Hopeman adversary; e-mail documents to MRE, DBS, and KLH	0.30	46.50
	DBS	Review Debtor's Response to Chubb Motion for Continuance	0.20	165.00
	DBS	Revise draft Objection to Chubb Motion for Continuance; final review of same	1.50	1,237.50
	DBS	Meet with KLH re: continuance objection strategy and upcoming tasks to prepare for confirmation hearing	0.80	660.00
	DBS	Review and analyze amended Liberty Declaratory Judgment Complaint; research re: issues presented	1.30	1,072.50
	DBS	Call with Committee counsel re: continuance hearing issues and strategy	0.20	165.00
	DBS	Review Committee Objection to Chubb continuance motion; preparation for hearing	0.60	495.00
	DBS	Correspondence to FCR re: case issues and strategy	0.30	247.50
	KLH	Review Amended Complaint filed by Liberty Mutual	0.90	405.00
06/24/2025	PJC	Conference with DBS re: insures declaratory action, bankruptcy plan of reorganization and strategy related thereto	1.00	625.00
	JCB	Research case law re: vested rights of third party beneficiaries; intended third party beneficiaries of insurance contracts; and subject matter jurisdiction of bankruptcy courts in preparation for 12(b)(6) motion against Liberty Mutual complaint.	6.20	1,705.00
	DBS	Prepare for and attend hearing on Chubb Motion to Continue Confirmation Hearing	3.00	2,475.00
	DBS	Call with MRE re: hearing outcome	0.10	82.50
	DBS	Correspondence exchange with KLH re: hearing outcome	0.10	82.50

ACCOUNT NO:
STATEMENT NO:

Plan of Reorganization

			HOURS	
06/25/2025	JCB	Review e-mail from D. Salzman re: Motion to Dismiss.	0.10	27.50
	MRE	Telephone conference with D. Salzman re: status	0.20	160.00
	JCB	Research in preparation for draft of Brief for Motion to Dismiss.	4.40	1,210.00
	DBS	Correspondence to Committee counsel re: desire to have update call	0.10	82.50
06/26/2025	DBS	Telephone conference with N. Miller re: deposition schedule	0.20	165.00
	DBS	Correspondence with M. Carolan re: deposition schedule	0.10	82.50
06/27/2025	DBS	Prepare for and attend Tully deposition	7.40	6,105.00
06/30/2025	MRE	Telephone conference with D. Salzman re: FTI deposition	0.20	160.00
	FDR	E-mails and telephone conference with JCB re: draft motion to dismiss and brief in support re: Liberty Mutual dec action; draft, edit, and revise motion and brief; research case law re: bankruptcy court jurisdiction; telephone conference with DBS to discuss deadlines for filing.	4.00	1,900.00
	JCB	Review Local Rules of Court to prepare for filing Motion to Dismiss and Brief in support.	1.80	495.00
	DBS	Correspondence exchange with N. Miller re: upcoming deposition schedule	0.10	82.50
	DBS	Call with MRE re: FTI deposition	0.20	165.00
		FOR CURRENT SERVICES RENDERED	175.70	109,845.00

RECAPITULATION

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
David B. Salzman	81.10	\$825.00	\$66,907.50
Shannon M. Clougherty	6.90	550.00	3,795.00
Paul J. Cordaro	1.00	625.00	625.00
Fred D. Rapone	6.10	475.00	2,897.50
Theresa Matiasic	0.40	140.00	56.00
Heather L. Jiuliantie	3.80	155.00	589.00
Kathryn L. Harrison	37.50	450.00	16,875.00
Joseph C. Bacharach	24.80	275.00	6,820.00
Marla R. Eskin	14.10	800.00	11,280.00

TOTAL CURRENT WORK 109,845.00

BALANCE DUE \$109,845.00

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Page: 1

Hopeman Brother, Inc.

Statement Date: June 30, 2025
Statement No. 1
Account No. 3100.02

Liberty Declaratory Judgment Action

			HOURS	
06/03/2025	MRE	Review of Liberty Mutual complaint	0.40	320.00
	KLH	Review Notice of Motion to Withdraw reference; motion and supporting memorandum from liberty mutual	1.20	540.00
	DBS	Review Liberty Mutual Complaint and related Motion to Withdraw reference	0.70	577.50
06/05/2025	MRE	Review of e-mail from K. Finnerty re: Liberty Mutual extension to withdrawal	0.10	80.00
06/12/2025	DBS	Review Liberty Declaratory Judgment Complaint, Liberty documents and rough out FCR answers	4.50	3,712.50
06/25/2025	DBS	Draft intro outline for Motion to Dismiss Declaratory Judgment Complaint; call with associate re: research needs and case strategy	2.30	1,897.50
06/26/2025	MRE	Review of amended Liberty Mutual complaint	0.10	80.00
	MRE	Telephone conference with D. Salzman re: status	0.10	80.00
	FDR	Meeting with DBS to discuss motion to dismiss Liberty Mutual declaratory judgment action.	0.30	142.50
	DBS	Meet with FDR re: Liberty Declaratory Judgment issues and strategy	0.60	495.00
	DBS	Telephone conference with J. Bacharach re: research issue	0.30	247.50
	JCB	Research issues and begin to draft Brief in Support of Motion to Dismiss.	4.60	1,265.00
		FOR CURRENT SERVICES RENDERED	15.20	9,437.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
David B. Salzman	8.40	\$825.00	\$6,930.00
Fred D. Rapone	0.30	475.00	142.50
Kathryn L. Harrison	1.20	450.00	540.00
Joseph C. Bacharach	4.60	275.00	1,265.00

Liberty Declaratory Judgment Action

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Marla R. Eskin	0.70	800.00	560.00
TOTAL CURRENT WORK			9,437.50
BALANCE DUE			<u>\$9,437.50</u>

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Page: 1

Hopeman Brother, Inc.

Statement Date: June 30, 2025
Statement No. 1
Account No. 3100.03

Travel

			HOURS	
05/12/2025	DBS	Travel to from Pittsburgh to Richmond (1/2 time)	3.00	2,475.00
05/14/2025	DBS	Return travel from Richmond to Pittsburgh (1/2 time)	3.00	2,475.00
	DBS	Return travel from Richmond to Pittsburgh after FCR engagement and follow up meetings with Debtor's counsel and Creditor Committee's counsel (1/2 time)	4.00	3,300.00
05/20/2025	DBS	Travel from Pittsburgh to Richmond for Solicitation Motion hearing (1/2 time)	3.00	2,475.00
05/22/2025	DBS	Return travel from Richmond to Pittsburgh (1/2 time)	3.00	2,475.00
		FOR CURRENT SERVICES RENDERED	16.00	13,200.00

RECAPITULATION

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
David B. Salzman	16.00	\$825.00	\$13,200.00

TOTAL CURRENT WORK 13,200.00

BALANCE DUE \$13,200.00

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Page: 1

Hopeman Brother, Inc.

Statement Date: June 30, 2025
Statement No. 1
Account No. 3100.03

PREVIOUS BALANCE	FEES	EXPENSES	ADVANCES	PAYMENTS	BALANCE
3100-00 Costs and Expenses					
0.00	0.00	5,531.24	0.00	0.00	\$5,531.24
3100-01 Plan of Reorganization					
0.00	109,845.00	0.00	0.00	0.00	\$109,845.00
3100-02 Liberty Declaratory Judgment Action					
0.00	9,437.50	0.00	0.00	0.00	\$9,437.50
3100-03 Travel					
0.00	13,200.00	0.00	0.00	0.00	\$13,200.00
0.00	132,482.50	5,531.24	0.00	0.00	<u>\$138,013.74</u>

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Page: 1

Hopeman Brother, Inc.

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

Costs and Expenses

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

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Page: 1

Hopeman Brother, Inc.

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

Plan of Reorganization

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

Plan of Reorganization

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

ACCOUNT NO:
STATEMENT NO:

Plan of Reorganization

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

RECAPITULATION

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

TOTAL CURRENT WORK 33,736.50

BALANCE DUE \$172,852.00

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Page: 1

Hopeman Brother, Inc.

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

Liberty Declaratory Judgment Action

PREVIOUS BALANCE \$36,962.50

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

Liberty Declaratory Judgment Action

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

RECAPITULATION

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

TOTAL CURRENT WORK 28,817.50

BALANCE DUE \$65,780.00

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Page: 1

Hopeman Brother, Inc.

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

Travel

PREVIOUS BALANCE \$14,550.00

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

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

TOTAL CURRENT WORK 6,465.00

BALANCE DUE \$21,015.00

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Page: 1

Hopeman Brother, Inc.

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

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

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Page: 1

Hopeman Brother, Inc.

Statement Date: July 31, 2025
Statement No. 2
Account No. 3100.00

Costs and Expenses

	PREVIOUS BALANCE	\$5,531.24
07/21/2025	KLH - Travel expense (gasoline) to Richmond, VA on 6/17/25	36.16
07/21/2025	KLH - Meal expense on 6/18/25 in Richmond, VA	7.68
07/21/2025	KLH - Lodging expense in Richmond, VA from 6/17/25 through 6/19/25	911.15
07/21/2025	KLH - Travel expense (gasoline) from Richmond, VA on 6/19/25	37.86
07/24/2025	Printing/Copying - July, 2025	10.10
07/29/2025	Scanning - July 2025	9.60
07/31/2025	Pacer charges for July, 2025	50.80
07/31/2025	Copier charges for July, 2025	25.50
07/31/2025	Westlaw charges for July, 2025	2,825.23
	TOTAL EXPENSES	3,914.08
	TOTAL CURRENT WORK	3,914.08
	BALANCE DUE	<u>\$9,445.32</u>

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**CAMPBELL
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310 Grant Street
Suite 1700
Pittsburgh, PA 15219
412-261-0310

Page: 1

Hopeman Brother, Inc.

Statement Date: July 31, 2025
Statement No. 2
Account No. 3100.01

Plan of Reorganization

PREVIOUS BALANCE \$109,845.00

			HOURS	
07/01/2025	FDR	Research Fourth Circuit case law re: joinder of indispensable parties and bankruptcy court decisions re: role of FCR; draft, edit, and revise brief in support of FCR motion to dismiss Liberty Mutual complaint.	4.00	1,900.00
	DBS	Prepare for and attend deposition of Debtor's 30(b)(6) designee	5.20	4,290.00
	DBS	Call with DAC re: case issues and upcoming deposition issue	0.40	330.00
	DAC	Call with DBS re: need for deposition coverage and relevant issues	0.40	360.00
07/03/2025	JCB	Search Virginia statutes and case law for rules re: insurer and insured's ability to contract to limit liability of insurer after a covered event happens.	3.20	880.00
07/07/2025	DBS	Correspondence exchange with N. Miller re: ongoing deposition schedule	0.10	82.50
	DBS	Review Hartford Objection to Plan	0.30	247.50
	DBS	Review Travelers Objection to Plan and exhibits	0.80	660.00
07/08/2025	MRE	Review of expert information and e-mail to D. Salzman re: same	0.20	160.00
	HLJ	Confer with KLH re: hearing binder for confirmation hearing on July 14, 2025	0.10	15.50
	HLJ	Review docket re: confirmation hearing; calendar dates	0.30	46.50
	DBS	Correspondence exchange and follow up call with MRE re: case developments and strategy	0.30	247.50
	DBS	Call with KLH re: case developments and strategy	0.40	330.00
	DBS	Review Chubb Objection to Plan Confirmation and exhibits	1.30	1,072.50
	DBS	Review Travelers witness and deposition designation	0.10	82.50
	DBS	Review Chubb seal motions	0.30	247.50

Plan of Reorganization

			HOURS	
	DBS	Review Chubb exhibit list	0.20	165.00
	MRE	Call with DBS re: developments and strategy	0.30	240.00
07/09/2025	MRE	Telephone conference with D. Salzman re: expert reports and status of case	0.40	320.00
	MRE	Telephone conference with D. Salzman re: confirmation hearing	0.20	160.00
	HLJ	Collate documents and prepare hearing binder for Plan Confirmation hearing on July 14, 2025	1.60	248.00
	HLJ	Review of adversary proceeding docket and pleadings; calendar all pertinent dates and deadlines for attorneys	1.00	155.00
	HLJ	Review of main case docket and pleadings; calendar all pertinent dates and deadlines for attorneys	1.30	201.50
	DBS	Correspondence exchanges with Committee counsel re: postponement of Confirmation Hearing; calls with DAC, MRE, and KLH re: need to cover proposed new date, strategy re: same	1.20	990.00
	KLH	Call with DBS re: discovery issues	0.30	135.00
07/10/2025	DBS	Calls with KLH re: case development and strategy	0.40	330.00
	DBS	Correspondence exchanges with Committee Counsel re: movement of Plan Confirmation date; internal correspondence with DAC, MRE, and KLH to coordinate coverage of new date; calls with DAC and MRE to discuss same; correspondence exchange with TMM re: change	1.10	907.50
	KLH	Call with DBS re: confirmation issues	0.40	180.00
07/15/2025	KLH	Review documents related to hearing on Motions to Dismiss; application to engage and various other motions heard by Court on 7/16 and preparation for same	1.90	855.00
07/17/2025	HLJ	Telephone conference with DBS re: unredacted Objections to Plan and various dates and deadlines relating to Plan	0.20	31.00
	HLJ	Upload Appellant's Opening Brief on Appeal of Order Appointing FCR; e-mail same to DBS and KLH	0.10	15.50
	HLJ	Upload and save various unredacted Objections to Plan; e-mail Chubb expert report to DBS	0.60	93.00
	HLJ	Review Confirmation Hearing timeline; calendar dates and deadlines	0.20	31.00
	DBS	Call with N. Miller re: case developments, scheduling and strategy re: same	0.10	82.50
	DBS	Call with KLH re: case developments, scheduling and strategy re: same	0.30	247.50
	DBS	Call with HLJ re: document needs	0.20	165.00
07/18/2025	DBS	Review Century Appellant Brief re: FCR appointment	0.40	330.00
	DBS	Review Committee Reply Brief re: FCR application	0.30	247.50
	DBS	Review case law relevant to confirmation and preparation for Confirmation Hearing	3.50	2,887.50
07/20/2025	KLH	Draft Response to Travelers' motion to extend discovery and Plan deadlines	1.70	765.00

Plan of Reorganization

			HOURS	
07/21/2025	KLH	Revisions to draft response to discovery motion by Travelers; meeting with DBS re: same and strategy related to Plan and deadlines	1.90	855.00
	DBS	Meet with KLH re: confirmation issues and strategy	0.50	412.50
	DBS	Review Draft Travelers Discovery Response	0.90	742.50
07/22/2025	HLJ	Confer with DBS re: objections to appointment of FCR filed in Imerys bankruptcy and 3rd Cir. Court of Appeals cases	0.10	15.50
	HLJ	Review dockets in Imerys bankruptcy and 3rd. Cir. Court of Appeals cases; download all objections and responses to appointment of FCR; e-mails to DBS re: same	1.10	170.50
07/23/2025	KLH	Participate in deposition of Chubb expert on plan matters	3.40	1,530.00
07/25/2025	DBS	Call with N. Miller re: case developments	0.30	247.50
	DBS	Review research re: confirmation issues	0.80	660.00
07/26/2025	KLH	Review Plan Proponent's briefs in response to Objections to Plan by insurers	1.10	495.00
07/28/2025	MRE	Telephone conference with D. Salzman re: pending matters	0.50	400.00
07/29/2025	DBS	Work on outline for response to confirmation objections	1.40	1,155.00
07/30/2025	DBS	Meet with KLH to discuss confirmation related issues and strategy	0.50	412.50
	KLH	Meeting with DBS re: matters related to response of FCR to Plan Objections and brief in support of same	0.50	225.00
	KLH	Review Plan Objections of insurers and begin draft FCR response to same	2.70	1,215.00
		FOR CURRENT SERVICES RENDERED	51.00	29,270.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Douglas A. Campbell	0.40	\$900.00	\$360.00
David B. Salzman	21.30	825.00	17,572.50
Fred D. Rapone	4.00	475.00	1,900.00
Heather L. Jiuliente	6.60	155.00	1,023.00
Kathryn L. Harrison	13.90	450.00	6,255.00
Joseph C. Bacharach	3.20	275.00	880.00
Marla R. Eskin	1.60	800.00	1,280.00

TOTAL CURRENT WORK 29,270.50

BALANCE DUE \$139,115.50

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Page: 1

Hopeman Brother, Inc.

Statement Date: July 31, 2025
Statement No. 2
Account No. 3100.02

Liberty Declaratory Judgment Action

PREVIOUS BALANCE \$9,437.50

			HOURS	
07/02/2025	FDR	Research 4th circuit case law for Rule 12(b)(6) standard for declaratory judgment action and VA case law re: post-occurrence agreements between insurer and insured; draft, edit, and revise brief in support of motion to dismiss Liberty Mutual complaint.	3.30	1,567.50
	JCB	Search Virginia statutes and case law for rules re: insurer and insured's ability to contract to limit liability of insurer after a covered event happens.	3.10	852.50
07/03/2025	FDR	Draft, edit, and revise brief in support of motion to dismiss Liberty Mutual dec action; research motions to dismiss dec actions for applicable standards; research subject matter jurisdiction for bankruptcy court determination of declaratory judgment; telephone conference with DBS re: draft brief; e-mail draft to DBS.	2.70	1,282.50
	DAC	Deposition of ACC member-counsel in Boston/Zoom - Trey Branham	1.50	1,350.00
07/07/2025	DBS	Call with KLH re: Liberty declaratory judgment action development and strategy	0.30	247.50
	DBS	Call with MRE re: Liberty declaratory judgment action development and strategy	0.20	165.00
	DBS	Review and revise draft Objection to Motion to Withdraw Reference; call with KLH re: strategy re: same	0.90	742.50
	KLH	Call with DBS re: Liberty action	0.30	135.00
	MRE	Call with DBS re: Liberty action	0.20	160.00
07/08/2025	DBS	Review and revise draft Motion to Dismiss Liberty Complaint	1.00	825.00
	KLH	Review debtors response to motion to withdraw reference and supporting memo; review committee documents	2.10	945.00

Liberty Declaratory Judgment Action

			HOURS	
07/09/2025	DBS	Meet with KLH re: Liberty Mutual Motion to Dismiss strategy and other developments	0.50	412.50
	KLH	Revisions to Draft Motion to Dismiss and Brief in Support with supporting case law; review against Draft motion of committee and debtor	1.30	585.00
07/10/2025	DBS	Review and revise draft Motion to Dismiss Liberty Declaratory Judgment action	4.50	3,712.50
	MRE	Review of Travelers exhibit list	0.10	80.00
	KLH	Review objections to Plan from insurers	2.90	1,305.00
07/11/2025	MRE	Review of Motion to Dismiss and Brief in support and e-mail to D. Salzman and K. Harrison re: revisions to same	0.50	400.00
07/15/2025	DBS	Final review and revision of Liberty Motion to Dismiss and supporting Brief; telephone conference with KLH re: same	1.50	1,237.50
	DBS	Call with KLH re: developments and strategy	0.20	165.00
	KLH	Make MRE revisions to Motion to Dismiss Liberty DJ Complaint; Telephone conference with DBS re: same	0.80	360.00
	JCB	Pull cases cited in brief re: third party beneficiary rights under Virginia law.	0.40	110.00
07/16/2025	DBS	Call with KLH re: case developments and strategy	0.30	247.50
	DBS	Review Rousell Motion to Dismiss	0.20	165.00
	DBS	Review Debtor's Motion to Dismiss	0.30	247.50
	DBS	Correspondence exchanges with local counsel re: draft Motion to Dismiss and his comments re: same; call with KLH re: same	0.40	330.00
	KLH	Review and revise and finalize Motion to Dismiss Liberty Complaint; various e-mails and Telephone conference with DBS re: same	2.80	1,260.00
	JCB	Review researched cases and e-mail to KH and DBS.	0.80	220.00
07/17/2025	DBS	Correspondence exchanges with parties to Rule 26 conference re: scheduling in Liberty Adversary	0.20	165.00
	JCB	Review and shepardize cases from Committee's Motion to Dismiss..	5.10	1,402.50
07/18/2025	DBS	Correspondence exchange re: Rule 26 conference	0.10	82.50
07/21/2025	KLH	Telephone conference with DBS re: matters related to Scarcella deposition	0.20	90.00
07/22/2025	DBS	Call with KLH re: Insurer deposition issues and strategy	0.30	247.50
	DBS	Call with MRE re: case developments, issues and strategy	0.40	330.00
	KLH	Telephone conference with DBS re: matters related to Plan and D/S, deposition of expert and other matters, follow up TC with DBS and email to debtor counsel re: same	0.80	360.00
07/23/2025	DBS	Call with KLH re: case issues, developments and strategy	0.30	247.50
	DBS	Meet with KLH re: insurance expert deposition outcome and case developments and strategies	0.50	412.50

Liberty Declaratory Judgment Action

			HOURS	
	DBS	Review underlying resource materials for insurance expert report	2.20	1,815.00
	KLH	Telephone conference with DBS re: insurer expert issues	0.30	135.00
	KLH	Meet with DBS re: Insurer Expert deposition outcome	0.50	225.00
07/24/2025	DBS	Correspondence exchange with KLH re: confirmation strategy	0.10	82.50
	DBS	Review resource material from similarly structured asbestos claims	2.60	2,145.00
07/31/2025	KLH	Draft response to Objections to Plan Confirmation	1.20	540.00
	KLH	Review discovery information from Debtor	0.30	135.00
FOR CURRENT SERVICES RENDERED			48.20	27,525.00

RECAPITULATION			
TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
Douglas A. Campbell	1.50	\$900.00	\$1,350.00
David B. Salzman	17.00	825.00	14,025.00
Fred D. Rapone	6.00	475.00	2,850.00
Kathryn L. Harrison	13.50	450.00	6,075.00
Joseph C. Bacharach	9.40	275.00	2,585.00
Marla R. Eskin	0.80	800.00	640.00

TOTAL CURRENT WORK 27,525.00

BALANCE DUE \$36,962.50

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CAMPBELL
& LEVINE, LLC | Attorneys at Law

310 Grant Street
Suite 1700
Pittsburgh, PA 15219
412-261-0310

Page: 1

Hopeman Brother, Inc.

Statement Date: July 31, 2025
Statement No. 2
Account No. 3100.03

Travel

PREVIOUS BALANCE \$13,200.00

			HOURS	
07/15/2025	KLH	Travel to Richmond for hearing on various motions (1/2 time)	3.00	1,350.00
		FOR CURRENT SERVICES RENDERED	3.00	1,350.00

	RECAPITULATION		
TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
Kathryn L. Harrison	3.00	\$450.00	\$1,350.00

TOTAL CURRENT WORK 1,350.00

BALANCE DUE \$14,550.00

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310 Grant Street
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Page: 1

Hopeman Brother, Inc.

Statement Date: July 31, 2025
Statement No. 2
Account No. 3100.03

PREVIOUS BALANCE	FEES	EXPENSES	ADVANCES	PAYMENTS	BALANCE
3100-00 Costs and Expenses 5,531.24	0.00	3,914.08	0.00	0.00	\$9,445.32
3100-01 Plan of Reorganization 109,845.00	29,270.50	0.00	0.00	0.00	\$139,115.50
3100-02 Liberty Declaratory Judgment Action 9,437.50	27,525.00	0.00	0.00	0.00	\$36,962.50
3100-03 Travel 13,200.00	1,350.00	0.00	0.00	0.00	\$14,550.00
<u>138,013.74</u>	<u>58,145.50</u>	<u>3,914.08</u>	<u>0.00</u>	<u>0.00</u>	<u>\$200,073.32</u>

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