

HUNTON ANDREWS KURTH LLP

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Telephone: (804) 788-8200

Counsel for Debtor and Debtor in Possession

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

:
: **Chapter 11**
:
: **Case No. 24-32428 (KLP)**
:
:
:
:

**SEVENTH MONTHLY FEE STATEMENT OF
HUNTON ANDREWS KURTH LLP AS BANKRUPTCY COUNSEL
FOR THE DEBTOR FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
FROM FEBRUARY 1, 2025 THROUGH AND INCLUDING FEBRUARY 28, 2025**

Name of Applicant:	Hunton Andrews Kurth LLP
Name of Client:	Hopeman Brothers, Inc. Debtor and Debtor in Possession
Date of retention order entered:	September 9, 2024, effective as of June 30, 2024 [Docket No. 163]
Time Period Covered:	February 1, 2025 through February 28, 2025
Total Fees Requested:	\$196,872.00 (80% of \$246,090.00)
Total Expenses Requested:	\$2,375.10
Type of Fee Statement:	Monthly ¹

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



Pursuant to sections 330, and 331 of title 11 of the United States Code, (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Bankruptcy Rules”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* entered September 9, 2024 [Docket No. 162] (the “Interim Compensation Order”), the law firm of Hunton Andrews Kurth LLP (“Hunton”), counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), hereby submits this monthly fee statement (the “Monthly Fee Statement”) for the allowance of compensation for the reasonable and necessary legal services rendered by Hunton for the period from February 1, 2025 through and including February 28, 2025 (the “Fee Period”) and reimbursement of the actual and necessary expenses that Hunton incurred during the Fee Period. By this Monthly Fee Statement, Hunton seeks allowance of compensation for services rendered in the amount of \$246,090.00 and payment in the amount of \$196,872.00 (which equals 80% of the compensation sought herein). Hunton also seeks allowance and reimbursement of actual and necessary expenses in the amount of \$2,375.10.

Itemization of Services Rendered and Disbursements Incurred

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

Representations

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

Notice

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

WHEREFORE, Hunton respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$199,247.10, consisting of (i) \$196,872.00, which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Hunton during the Fee Period, and (ii) \$2,375.10 for actual and necessary costs and expenses.

[Remainder of Page Intentionally Left Blank]

Dated: March 31, 2025
Richmond, Virginia

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

Tyler P. Brown (VSB No. 28072)

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

HUNTON ANDREWS KURTH LLP

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- and -

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

HUNTON ANDREWS KURTH LLP

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Houston, TX 77002

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Facsimile: (713) 220-4285

Email: josephrovira@HuntonAK.com

crankin@HuntonAK.com

Counsel for the Debtor and Debtor in Possession

EXHIBIT A

Statement of Fees by Subject Matter during the Fee Period

Matter Code	Matter Description	Hours	Fees Requested
B110	Case Administration	12.5	\$8,665.00
B150	Meetings of and Communications with Creditors	1.1	\$1,127.50
B160	Fee / Employment Applications	14.9	\$14,586.50
B190	Other Contested Matters (excluding assumption / rejection motions)	163.8	\$204,491.50
B210	Business Operations	7.3	\$6,214.50
B320	Plan and Disclosure Statement (including Business Plan)	10.7	\$11,005.00
Total		210.3	\$246,090.00

EXHIBIT B

Professionals Rendering Services during the Fee Period

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

Professional	Position	Year Admitted	Expertise	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. P. Brown	Partner	1987	Bankruptcy	\$1,485	82.0	\$121,770.00
J. P. Rovira	Partner	2008	Bankruptcy	\$1,100	35.1	\$38,610.00
H. P. Long III	Counsel	2007	Bankruptcy	\$1,025	62.2	\$63,755.00
C. A. Rankin	Associate	2018	Bankruptcy	\$895	16.3	\$14,588.50
N. S. Monico	Associate	2023	Bankruptcy	\$695	4.7	\$3,266.50
Totals					200.3	\$241,990.00

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

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
T. L. Canada	Paralegal	Bankruptcy	\$410	10.0	\$4,100.00
Totals				10.0	\$4,100.00

EXHIBIT C

Summary of Expenses Incurred during the Fee Period

Type	Expenses
Online Research (Westlaw and Lexis)	\$343.36
Local Travel	\$13.00
Meals	\$16.99
Trial Transcripts	\$33.00
Litigation Support Vendors	\$1,968.75
TOTAL EXPENSES:	\$2,375.10

EXHIBIT D

Detailed Invoice of Fees and Expenses Incurred During the Fee Period

HUNTON ANDREWS KURTH

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

TEL 713 • 220 • 4200

EIN 54-0572269

INVOICE SUMMARY

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

FILE NUMBER: 040312.0000007
INVOICE NUMBER: 131823856
DATE: 03/27/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

Thank you for your business and continued support of Hunton Andrews Kurth LLP.

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending February 28, 2025 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring

Current Fees:	\$ 246,090.00
Current Charges:	2,375.10
CURRENT INVOICE AMOUNT DUE:	\$ 248,465.10

TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

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

To Pay By Mail:
HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 040312.0000007, Inv: 131823856, Date: 03/27/2025

HUNTON ANDREWS KURTH

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

TEL 713 • 220 • 4200

EIN 54-0572269

INVOICE SUMMARY-REMITTANCE PAGE

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To Pay By Mail:
HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 040312.0000007, Inv: 131823856, Date: 03/27/2025

HUNTON ANDREWS KURTH

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

TEL 713 • 220 • 4200

EIN 54-0572269

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RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring

FOR PROFESSIONAL SERVICES RENDERED THROUGH FEBRUARY 28, 2025:

DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/03/2025	C A RANKIN	B110	Prepare for and participate in weekly Stout/Hunton conference.	0.70	626.50
02/04/2025	C A RANKIN	B110	Prepare for and participate in weekly Stout/Hunton conference.	0.60	537.00
02/10/2025	T L CANADA	B110	Prepare Notice of Cancelled Hearing in anticipation of cancellation of February 13th omnibus hearing	0.20	82.00
02/10/2025	H P LONG, III	B110	Communications with chambers regarding items scheduled for hearing on February 13 and analyze status of same	0.50	512.50
02/10/2025	T L CANADA	B110	Finalize and electronically file CNOs for 2nd fee application orders for Hunton, Blank Rome, CKSMM, and Stout	0.40	164.00
02/11/2025	C A RANKIN	B110	Prepare for and participate in weekly Stout/Hunton conference to discuss status of various work streams.	0.60	537.00

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: Hopeman Brothers, Inc.
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/11/2025	T L CANADA	B110	Work on and electronically file Agenda for February 13th hearing	1.30	533.00
02/11/2025	T P BROWN	B110	Review proposed 2/13 hearing agenda	0.10	148.50
02/11/2025	H P LONG, III	B110	Communications with chambers regarding February 13 hearing, including Zoom appearances in connection with same	0.40	410.00
02/11/2025	H P LONG, III	B110	Analyze and comment on agenda for February 13 hearing	0.80	820.00
02/12/2025	C A RANKIN	B110	Analyze status of case workstreams and tasks pertaining to upcoming deadlines in case.	0.30	268.50
02/13/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
02/13/2025	T L CANADA	B110	Electronically file certificate of service for doc. nos. 549-552	0.10	41.00
02/14/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
02/18/2025	T L CANADA	B110	Prepare Notice of Motions and Notice of Hearing for Second Exclusivity Motion and Motion for Third Interim Order Extending the Automatic Stay for Non-Asbestos	0.40	164.00
02/18/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
02/18/2025	T L CANADA	B110	Electronically file certificate of service for doc. no. 555	0.10	41.00
02/18/2025	C A RANKIN	B110	Prepare for and participate in weekly Stout/Hunton conference to discuss case updates and related work streams.	0.90	805.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/19/2025	H P LONG, III	B110	Communications with Verita regarding service of motions for interim order extending stay and exclusivity	0.20	205.00
02/19/2025	T L CANADA	B110	Electronically file certificate of service for doc. nos. 559, 560, 562, 563.	0.20	82.00
02/20/2025	C A RANKIN	B110	Coordinate finalization of Blank Rome's and CKSMM's January fee statements.	0.30	268.50
02/25/2025	H P LONG, III	B110	Analyze notice of appearance and communications with Verita regarding the same	0.20	205.00
02/26/2025	T L CANADA	B110	Electronically file certificate of service for doc. nos. 577-580	0.10	41.00
02/26/2025	T L CANADA	B110	Prepare notice of motion for motion to expedite Chubb settlement status conference	0.30	123.00
02/27/2025	T L CANADA	B110	Prepare hearing materials for T. Brown in anticipation of March 5th hearing	1.00	410.00
02/28/2025	T L CANADA	B110	Work on Agenda for March 5th hearing	2.00	820.00
02/28/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita related to same	0.20	205.00
			TOTAL B110	12.50	
02/05/2025	H P LONG, III	B150	Analyze and respond to request from counsel to party in interest regarding hearing transcripts (.50), and communications with P. Barrett regarding the same (.10)	0.60	615.00
02/10/2025	H P LONG, III	B150	Communications with N. Miller regarding Committee's items scheduled for hearing on February 13 and analyze status of same	0.50	512.50

HUNTON ANDREWS KURTH LLP
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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
			TOTAL B150	1.10	
02/03/2025	T P BROWN	B160	Conference with T.Long re committee fee statement and related concerns	0.20	297.00
02/06/2025	H P LONG, III	B160	Analyze issues and strategy for approval of fee applications and hearing on the same following passage of objection deadline	0.60	615.00
02/07/2025	T L CANADA	B160	Prepare Orders granting 2nd interim fee applications for Stout, Blank Rome, CKSMM, and incorporate UST comments for Hunton's Order	0.50	205.00
02/07/2025	T L CANADA	B160	Prepare CNOs for Blank Rome, CKSMM, Stout, and Hunton 2nd fee applications	0.50	205.00
02/07/2025	H P LONG, III	B160	Analyze and review revised Hunton fee application order (.20), Blank Rome fee app order (.10), Stout fee app order (.10), and Courington fee app order (.10), and prepare and send email to K. Montgomery regarding endorsement of the same (.30)	0.80	820.00
02/10/2025	T L CANADA	B160	Finalize and submit Order granting 2nd Fee Applications for Hunton, Blank Rome, CKSMM, and Stout	0.40	164.00
02/10/2025	H P LONG, III	B160	Communications with US Trustee regarding proposed revision for order approving Hunton's fee application and analyze same	0.40	410.00
02/11/2025	T P BROWN	B160	Conference with T.Long and related emails re 2/13 hearing	0.20	297.00
02/11/2025	H P LONG, III	B160	Multiple communications with N. Miller regarding status of Committee fee applications scheduled for February 13 hearing and status of February 13 hearing	0.70	717.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/12/2025	T P BROWN	B160	Prepare for 2/13 hearing and update	0.50	742.50
02/12/2025	T P BROWN	B160	Conference with T.Long re fee app hearing related issues and court update	0.30	445.50
02/13/2025	H P LONG, III	B160	Review entered orders approving debtor's fee applications	0.40	410.00
02/13/2025	H P LONG, III	B160	Communications with debtor professionals concerning hearing on the fee applications	0.40	410.00
02/13/2025	T P BROWN	B160	Emails with T.Long, K.Courington and R.Van Epps re fee hearing and approvals	0.20	297.00
02/13/2025	T P BROWN	B160	Conference with T.Long re hearing materials and appearances by other counsel and reps	0.30	445.50
02/13/2025	T P BROWN	B160	Prepare for hearing on fee apps and attend hearing	1.40	2,079.00
02/14/2025	H P LONG, III	B160	Analyze Verita invoices and related communications with C. Lascell	0.40	410.00
02/14/2025	T P BROWN	B160	Emails with T.Long re Verita invoices and review same	0.20	297.00
02/14/2025	C A RANKIN	B160	Analyze and address open items regarding Hunton January fee statement.	1.90	1,700.50
02/19/2025	C A RANKIN	B160	Analyze and address open items regarding CKSMM, Stout, and Blank Rome January monthly fee statements.	0.60	537.00
02/19/2025	T L CANADA	B160	Draft Hunton's 6th monthly fee statement for January 2025.	1.30	533.00
02/20/2025	C A RANKIN	B160	Analyze and revise Hunton's January fee statement and circulate same to T. Brown for review.	0.30	268.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/21/2025	T P BROWN	B160	Review Hunton fee statement and email related comments to C.Rankin	0.40	594.00
02/21/2025	C A RANKIN	B160	Analyze Hunton retention papers regarding monthly fee statement open items (.2) and communications with T. Brown and C. Lascell regarding same (.4).	0.60	537.00
02/21/2025	T P BROWN	B160	Conference with T.Long re fee statements and rate changes and related email with C.Rankin	0.20	297.00
02/21/2025	T P BROWN	B160	Review committee fee statement filed for MLB	0.10	148.50
02/24/2025	T L CANADA	B160	Finalize and electronically file 6th monthly fee statements for Hunton, Blank Rome, CKSMM, and Stout	0.60	246.00
02/24/2025	T L CANADA	B160	Remit LEDES files to UST for Hunton, Blank Rome, CKSMM, and Stout	0.10	41.00
02/24/2025	C A RANKIN	B160	Coordinate finalization and filing of Debtors' professionals' monthly fee statements.	0.30	268.50
02/24/2025	T P BROWN	B160	Emails with C.Lascell and C.Rankin re fee apps and filing same	0.10	148.50
			TOTAL B160	14.90	
02/03/2025	C A RANKIN	B190	Analyze and consider terms of 524(g) term sheet (1.2) and review and revise 524(g) analysis (.6).	1.80	1,611.00
02/03/2025	J P ROVIRA	B190	Review term sheet provided by Committee and address issues related to same.	1.30	1,430.00
02/03/2025	T P BROWN	B190	Review committee proposed 524(g) term sheet and related financial projections and consider strategy	2.30	3,415.50
02/03/2025	T P BROWN	B190	Emails with J.Rovira re section 524(g) plan and related call	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/04/2025	J P ROVIRA	B190	Discuss issues related to Committee term sheet with T. Brown (.7); prepare for and participate in call with client regarding same (.8).	1.50	1,650.00
02/04/2025	C A RANKIN	B190	Prepare for and participate in conference with C. Lascell, K. Brinkman, and Hunton team regarding initial assessment of 524(g) term sheet.	0.70	626.50
02/04/2025	T P BROWN	B190	Emails with P.Barrett, K.Brinkman, R.Van Epps and C.Lascell re proposal and call to discuss	0.20	297.00
02/04/2025	T P BROWN	B190	Prepare for and participate in call with R.Van Epps, K.Brinkman and C.Lascell re committee proposal and issues and questions on same	1.00	1,485.00
02/04/2025	T P BROWN	B190	Call with Stout re committee proposal and outstanding issues	0.60	891.00
02/04/2025	T P BROWN	B190	Conference with J.Rovira re committee proposal and related strategy	0.50	742.50
02/04/2025	T P BROWN	B190	Review committee proposal and develop initial comments and questions	1.80	2,673.00
02/05/2025	T P BROWN	B190	Work on potential revisions to term sheet and related questions	1.50	2,227.50
02/05/2025	T P BROWN	B190	Conference with J.Rovira re term sheet and related issues and related emails	0.40	594.00
02/05/2025	T P BROWN	B190	Telephone call with P.Barrett re term sheet, questions and proposed insert.	0.80	1,188.00
02/05/2025	T P BROWN	B190	Prepare list of issues/questions in response to committee 524(g) proposed term sheet	2.20	3,267.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/05/2025	H P LONG, III	B190	Analyze and comment on term sheet from Committee, including analyzing case law related to same	2.60	2,665.00
02/06/2025	T P BROWN	B190	Revise term sheet and information requests	3.40	5,049.00
02/06/2025	T P BROWN	B190	Emails with mediator and client reps re call on term sheet and comments	0.20	297.00
02/06/2025	T P BROWN	B190	Conference with T.Long and emails with T.Long re comments on term sheet and related issues	0.30	445.50
02/06/2025	T P BROWN	B190	Conference with J.Rovira re term sheet revisions	0.50	742.50
02/06/2025	H P LONG, III	B190	Continue to analyze and comment on Committee term sheet	1.40	1,435.00
02/06/2025	C A RANKIN	B190	Analyze and consider strategy for revised 524(g) term sheet.	0.80	716.00
02/06/2025	J P ROVIRA	B190	Review and revise Committee term sheet and list of open questions regarding same (1.3); discuss same with T. Brown (.5); attention to correspondence related to same (.2).	2.00	2,200.00
02/07/2025	T P BROWN	B190	Emails with K.Brinkman re term sheet revisions	0.10	148.50
02/07/2025	T P BROWN	B190	Email with committee and mediator re revised term sheet and information requests	0.20	297.00
02/07/2025	T P BROWN	B190	Conference with T.Long re compensation orders to UST and CNO's	0.10	148.50
02/07/2025	J P ROVIRA	B190	Address issues relating to revised term sheet and participate in multiple calls related to same.	1.30	1,430.00
02/07/2025	T P BROWN	B190	Prepare for call with mediator and prepare related outline for call	1.50	2,227.50

HUNTON ANDREWS KURTH LLP
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 PAGE: 9

DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/07/2025	T P BROWN	B190	Conferences with J.Rovira re mediator call prep and re insert from P.Barrett	0.50	742.50
02/07/2025	T P BROWN	B190	Emails with K.Brinkman re comments on term sheet and information requests	0.20	297.00
02/07/2025	T P BROWN	B190	Email and call with P.Barrett re questions on insert to term sheet	0.30	445.50
02/07/2025	T P BROWN	B190	Call with mediator and debtor reps	0.60	891.00
02/07/2025	T P BROWN	B190	Revisions to term sheet and draft information requests	2.60	3,861.00
02/07/2025	T P BROWN	B190	Conference with J.Rovira re Chubb call	0.10	148.50
02/10/2025	H P LONG, III	B190	Analyze and work on motion for third interim order extending the stay	4.40	4,510.00
02/10/2025	H P LONG, III	B190	Analyze status of negotiations regarding Chubb settlement (.70) and related emails from insurer counsel and request for additional information (.60)	1.30	1,332.50
02/10/2025	T P BROWN	B190	Review committee case examples on 524(g) plans and investments and consider related strategy	1.20	1,782.00
02/10/2025	T P BROWN	B190	Conference with T.Long re hearing on February 13 and prep for same	0.20	297.00
02/10/2025	T P BROWN	B190	Emails with mediator re potential call on term sheet	0.10	148.50
02/10/2025	T P BROWN	B190	Emails with committee, J.Rovira and others re call on term sheet	0.20	297.00
02/10/2025	T P BROWN	B190	Emails with Chubb counsel and J.Rovira re update call	0.10	148.50
02/10/2025	T P BROWN	B190	Emails and conference with T.Long re UST change to order and CNO filings	0.10	148.50

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02/10/2025	J P ROVIRA	B190	Continue to address issues related to proposed term sheet with Committee and attention to correspondence related to same.	1.30	1,430.00
02/11/2025	J P ROVIRA	B190	Prepare for and participate in call with counsel for Chubb to provide mediation update (.8); prepare for and participate in call with Stout team concerning mediation and next stems (.7); review materials in advance of meeting with Committee on term sheet and address issues related to same (1.2).	2.70	2,970.00
02/11/2025	T P BROWN	B190	Call with Chubb's counsel re mediation status and settlement strategy	1.00	1,485.00
02/11/2025	T P BROWN	B190	Call with Stout reps on mediation, Chubb call and related strategy	0.50	742.50
02/11/2025	T P BROWN	B190	Conference with J.Rovira re stay extension and exclusivity motions	0.40	594.00
02/11/2025	T P BROWN	B190	Conference with T.Long re potential hearing dates for extension motions and strategy re preparation of motions and extensions to be sought	0.40	594.00
02/11/2025	T P BROWN	B190	Consider strategy re 524(g) plan proposal and related case law and open issues	1.10	1,633.50
02/12/2025	J P ROVIRA	B190	Prepare for and participate in virtual meeting with mediator and Committee professionals (2.3); follow up discussions related to same with T. Brown (.5); attention to correspondence related to same (.5).	3.30	3,630.00
02/12/2025	T P BROWN	B190	Conference with J.Rovira re mediation and Chubb issues and client call	0.20	297.00
02/12/2025	T P BROWN	B190	Emails with J.Rovira re client call prep	0.10	148.50

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02/12/2025	T P BROWN	B190	Prepare for and participate in call with committee and mediator re term sheet and liquidation analysis	2.00	2,970.00
02/12/2025	H P LONG, III	B190	Prepare for hearing on February 13 and analyze issues related to same	1.10	1,127.50
02/12/2025	H P LONG, III	B190	Analyze and continue to work on motion for third interim order extending the stay period	1.90	1,947.50
02/13/2025	H P LONG, III	B190	Prepare for and attend February 13 omnibus hearing	1.70	1,742.50
02/13/2025	T P BROWN	B190	Emails with K.Brinkman re MLB call on coverage issues	0.10	148.50
02/13/2025	T P BROWN	B190	Emails with Chubb's counsel re discussion on mediation status	0.10	148.50
02/13/2025	C A RANKIN	B190	Prepare for and participate in conference with C. Lascell, Hunton team, Stout team, and K. Brinkman regarding status of case and negotiations with Committee and other key parties.	1.10	984.50
02/13/2025	J P ROVIRA	B190	Prepare for and participate in update call with client related to mediation session with Committee (1.3); follow up discussion related to same with T. Brown (.3); attention to correspondence related to same (.2).	1.80	1,980.00
02/13/2025	T P BROWN	B190	Participate in client call on results of committee/mediator call on 2/12/25	0.50	742.50
02/13/2025	T P BROWN	B190	Emails with P.Barrett re term sheet discussion	0.10	148.50
02/13/2025	T P BROWN	B190	Conference with J.Rovira re strategy for term sheet and related issues	0.30	445.50

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02/14/2025	J P ROVIRA	B190	Prepare for and participate in call with insurers concerning mediation status and proposal from Committee (1.2); follow up discussion with T. Brown (.3); address issues relating to potential resolution of mediation and strategy related to same (.3).	1.80	1,980.00
02/14/2025	T P BROWN	B190	Conference with J.Rovira re Chubb discussion and related strategy	0.30	445.50
02/14/2025	T P BROWN	B190	Call with Chubb's counsel re term sheet discussions and settlement motion	0.70	1,039.50
02/14/2025	T P BROWN	B190	Conference with J.Rovira re results of Chubb call	0.20	297.00
02/14/2025	T P BROWN	B190	Emails with T.Long re stay extension motion	0.10	148.50
02/14/2025	T P BROWN	B190	Emails with P.Barrett re motion to consolidate appeals and update on term sheet	0.10	148.50
02/14/2025	H P LONG, III	B190	Analyze and work on motion for third interim order extending the stay period	3.70	3,792.50
02/15/2025	T P BROWN	B190	Emails with P.Barrett re extension request	0.10	148.50
02/17/2025	T P BROWN	B190	Consider strategy re term sheet discussions and potential plan issues	0.30	445.50
02/17/2025	T P BROWN	B190	Call from J.Rovira re Chubb discussion and related strategy	0.10	148.50
02/17/2025	T P BROWN	B190	Emails with P.Barrett re extension request and any related impact on case	0.10	148.50
02/17/2025	T P BROWN	B190	Review draft of stay extension motion and consider potential changes	0.40	594.00
02/18/2025	T P BROWN	B190	Prepare for and participate in call with Stout on strategy and open issues and hearing prep	0.80	1,188.00

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02/18/2025	T P BROWN	B190	Conference with J.Rovira re committee meeting results and related term sheet strategy and Chubb discussions	0.60	891.00
02/18/2025	T P BROWN	B190	Work on term sheet revisions and potential responses and questions on term sheet and liquidation analysis and approach	0.50	742.50
02/18/2025	T P BROWN	B190	Conference with J.Rovira re term sheet and Chubb strategy	0.40	594.00
02/18/2025	T P BROWN	B190	Revise motion on exclusivity extension and related conference with T.Long	0.40	594.00
02/18/2025	T P BROWN	B190	Emails with P.Barrett re calls on term sheet and re extension request and consider same	0.30	445.50
02/18/2025	T P BROWN	B190	Emails with mediator re call with debtor and committee and related emails with J.Rovira	0.20	297.00
02/18/2025	T P BROWN	B190	Review email to committee re term sheet status and related conference with J.Rovira	0.10	148.50
02/18/2025	T P BROWN	B190	Review comments to term sheet for client discussion	0.50	742.50
02/18/2025	T P BROWN	B190	Review emails from and to K.Brinkman re coverage exhaustion issue for negotiations	0.20	297.00
02/18/2025	T P BROWN	B190	Review committee revisions to term sheet and liquidation analysis and consider strategy re same	0.40	594.00
02/18/2025	T P BROWN	B190	Review notice of deposition and related email from K.Courington	0.10	148.50
02/18/2025	H P LONG, III	B190	Analyze comments on settlement term sheet from Committee and related strategy	0.70	717.50

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02/18/2025	H P LONG, III	B190	Analyze and work on motion for third interim order extending stay periods	2.10	2,152.50
02/18/2025	T P BROWN	B190	Conferences with T.Long re potential hearing dates for term sheet, exclusivity and stay motions	0.20	297.00
02/18/2025	T P BROWN	B190	Revise proposed motion on stay extension and review transcript on rulings	1.90	2,821.50
02/18/2025	J P ROVIRA	B190	Prepare for and participate in call with Stout concerning mediation and potential settlement issues (1.0); attention to correspondence related to same with Committee (.7); review and revise term sheet and attention to correspondence related to same (1.5); participate in multiple calls with T. Brown relating to potential settlement with Committee (.6).	3.80	4,180.00
02/18/2025	C A RANKIN	B190	Analyze materials from Committee regarding 524(g) construct and assess strategic considerations regarding same.	1.60	1,432.00
02/19/2025	C A RANKIN	B190	Prepare for and participate in conference with C. Lascell, Hunton team, Stout team, K. Brinkman, and S. Barrett regarding Committee's 524(g) materials and strategic considerations regarding same.	1.10	984.50
02/19/2025	T L CANADA	B190	Finalize and electronically file Second Motion to Extend Exclusivity Period and Notice regarding same	0.50	205.00
02/19/2025	C A RANKIN	B190	Conduct research for term sheet revisions and communications with J. Rovira regarding same.	0.50	447.50

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02/19/2025	J P ROVIRA	B190	Prepare for and participate in call with client concerning settlement term sheet and next steps (1.3); follow up discussions with T. Brown related to same (1.0); attention to correspondence related to same (.5); review talking points on liquidation analysis and address issues related to same (.5).	3.30	3,630.00
02/19/2025	J P ROVIRA	B190	Review and revise motion to extend automatic stay and attention to correspondence related to same.	1.00	1,100.00
02/19/2025	T P BROWN	B190	Emails with J.Rovira re calls on term sheet revisions with client and mediator	0.20	297.00
02/19/2025	T P BROWN	B190	Emails and conferences with T.Long re exclusivity extension motion and revised deadlines	0.50	742.50
02/19/2025	T P BROWN	B190	Revise proposed exclusivity motion	0.40	594.00
02/19/2025	T P BROWN	B190	Revise proposed motion to extend stay period and emails with T.Long re same	0.40	594.00
02/19/2025	T P BROWN	B190	Emails with P.Barrett re proposed term sheet calls and sharing of draft	0.10	148.50
02/19/2025	T P BROWN	B190	Emails with mediator re proposed call with committee and debtor professionals on term sheet	0.10	148.50
02/19/2025	T P BROWN	B190	Emails with committee counsel re mediation call	0.10	148.50
02/19/2025	T P BROWN	B190	Call with P.Barrett re term sheet issues and related emails with J.Rovira and revise term sheet accordingly	0.50	742.50

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02/19/2025	T P BROWN	B190	Draft discussion points for liquidation analysis and related call and emails re proposed points with client and advisors re same	2.20	3,267.00
02/19/2025	T P BROWN	B190	Conference with T.Long re filing notices and motions on exclusivity and stay and final modifications per term sheet discussions	0.20	297.00
02/19/2025	T P BROWN	B190	Review proposed email from T.Long re exclusivity dates and extensions requested and conference with T.Long re same	0.20	297.00
02/19/2025	T P BROWN	B190	Review comments to stay extension motion and related calls with T.Long and J.Rovira	0.30	445.50
02/19/2025	T P BROWN	B190	Conference with J.Rovira to prepare for client call on term sheet and related call with client	0.70	1,039.50
02/19/2025	H P LONG, III	B190	Analyze comments to settlement term sheet and participate in call with debtor team, including C. Lascell and Stout to discuss same and strategy	0.80	820.00
02/19/2025	H P LONG, III	B190	Emails with C. Lascell regarding motion for third interim order extending stay and motion to extend exclusivity	0.50	512.50
02/19/2025	H P LONG, III	B190	Analyze and finalize motion for third interim order extending stay periods	1.80	1,845.00
02/20/2025	J P ROVIRA	B190	Prepare for and participate in call with Committee and mediator concerning term sheet (1.3); follow up discussions with T. Brown (.5); attention to correspondence related to same (.3).	2.10	2,310.00

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02/20/2025	T P BROWN	B190	Prepare for call with committee and mediator on term sheet and liquidation analysis	0.50	742.50
02/20/2025	T P BROWN	B190	Call with committee and mediator on term sheet and liquidation analysis	0.80	1,188.00
02/20/2025	T P BROWN	B190	Conference with J.Rovira following call with mediator and committee	0.50	742.50
02/20/2025	T P BROWN	B190	Review email from J.Rovira to C.Lascell and others re results of mediation call	0.10	148.50
02/20/2025	T P BROWN	B190	Work on list of prepetition vendors and professionals and related conference with T.Long	0.20	297.00
02/20/2025	T P BROWN	B190	Conference with T.Long re SOFA info and POC's vendor payments made and owed and email with T.Long re same	0.30	445.50
02/20/2025	T P BROWN	B190	Review preliminary protected persons list from C.Rankin and related email	0.10	148.50
02/20/2025	T P BROWN	B190	Emails with mediator re extension of mediation	0.10	148.50
02/20/2025	T P BROWN	B190	Preliminary review of fee statement	0.20	297.00
02/20/2025	T P BROWN	B190	Consider strategy re term sheet and plan provisions	0.40	594.00
02/20/2025	C A RANKIN	B190	Analyze revised 524(g) term sheet and prepare draft of Exhibit B for same, and circulate draft to client for review.	0.70	626.50
02/20/2025	H P LONG, III	B190	Analyze and work on settlement term sheet, including identifying each of the intended protected parties	0.70	717.50
02/21/2025	T P BROWN	B190	Emails with J.Rovira re settled but unpaid claims and consider related proposed treatment	0.40	594.00

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02/21/2025	T P BROWN	B190	Review reports re holders and sums of settled but unpaid claims	0.80	1,188.00
02/21/2025	T P BROWN	B190	Conference with J.Rovira re term sheet revisions and review same and related strategy	0.40	594.00
02/21/2025	T P BROWN	B190	Emails with P.Barrett re term sheet discussions and fee statement	0.20	297.00
02/21/2025	T P BROWN	B190	Review emails from committee counsel re liquidation analysis and preliminary review of analysis	0.40	594.00
02/21/2025	T P BROWN	B190	Review emails with C.Lascell re term sheet changes and sharing with Chubb	0.10	148.50
02/21/2025	T P BROWN	B190	Review email with Chubb's counsel re term sheet	0.10	148.50
02/21/2025	T P BROWN	B190	Review docket notices re consolidation of appeals and briefing	0.10	148.50
02/21/2025	T P BROWN	B190	Review list of persons to be protected from avoidance actions and related email from C.Lascell and conferences with J.Rovira and T.Long re same	0.30	445.50
02/21/2025	T P BROWN	B190	Consider strategy re plan and term sheet	0.40	594.00
02/21/2025	H P LONG, III	B190	Analyze and work on exhibit to settlement term sheet	0.70	717.50
02/21/2025	J P ROVIRA	B190	Continue to address issues relating to potential settlement with Committee and attention to correspondence related to same (1.0); review and revise term sheet related to same and address strategy related to same (.8).	1.80	1,980.00

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02/21/2025	C A RANKIN	B190	Analyze comments regarding Exhibit B to 524(g) term sheet and revise same.	0.50	447.50
02/22/2025	T P BROWN	B190	Review updated liquidation analysis from committee counsel and consider additional questions	0.40	594.00
02/24/2025	T P BROWN	B190	Emails with debtor's professionals re term sheet and liquidation analysis and related call	0.20	297.00
02/24/2025	T P BROWN	B190	Call with Chubb re term sheet and settlement discussions	0.80	1,188.00
02/24/2025	H P LONG, III	B190	Analyze strategy and issues related to settlement term sheet and next steps	1.20	1,230.00
02/24/2025	T P BROWN	B190	Conference with J.Rovira re Chubb call	0.30	445.50
02/24/2025	C A RANKIN	B190	Analyze Choate's letter regarding Liberty's participation in mediation.	0.20	179.00
02/24/2025	H P LONG, III	B190	Analyze letter from counsel to Liberty Mutual regarding mediation and purported claim and strategy (.50) and analyze claim filed by Liberty Mutual (.30)	0.80	820.00
02/24/2025	J P ROVIRA	B190	Prepare for and participate in update call with counsel for Chubb.	1.00	1,100.00
02/24/2025	T P BROWN	B190	Research precedent on 524(b) cases and term sheet proposed structure	2.30	3,415.50
02/24/2025	T P BROWN	B190	Emails with J.Rovira re client call on liquidation analysis and strategy	0.10	148.50
02/24/2025	T P BROWN	B190	Conference with J.Rovira after Chubb call	0.40	594.00
02/24/2025	T P BROWN	B190	Work on questions on liquidation analysis and review related documents	0.70	1,039.50
02/24/2025	T P BROWN	B190	Consider request of LMIC to join mediation and related emails with J.Rovira	0.30	445.50

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02/25/2025	H P LONG, III	B190	Analyze issues and strategy related to filing term sheet with court and prepare motion related to same	2.30	2,357.50
02/25/2025	T P BROWN	B190	Emails with C.Rankin re Stout call	0.10	148.50
02/25/2025	T P BROWN	B190	Consider motion strategy and review complex case roles and code re related relief	0.30	445.50
02/25/2025	T P BROWN	B190	Consider updated liquidation analysis and additional questions	0.40	594.00
02/25/2025	T P BROWN	B190	Review precedent for trust provisions contemplated by proposed term sheet	1.20	1,782.00
02/25/2025	T P BROWN	B190	Emails with committee counsel re term sheet precedent and related email with J.Rovira	0.10	148.50
02/25/2025	T P BROWN	B190	Conference with J.Rovira to report on client call and discuss term sheet strategy	0.50	742.50
02/25/2025	T P BROWN	B190	Emails with P.Barrett re call and term sheet discussions	0.10	148.50
02/25/2025	T P BROWN	B190	Conference with T.Long re preparation of motions re term sheet and related email with J.Rovira	0.50	742.50
02/25/2025	T P BROWN	B190	Prepare for and participate in call with client and debtor professionals on term sheet, liquidation analysis and strategy	1.60	2,376.00
02/26/2025	T P BROWN	B190	Emails with committee counsel re term sheet revisions and proposed discussion	0.10	148.50
02/26/2025	T P BROWN	B190	Revise motion and order for expedited status conference and term sheet overview	0.90	1,336.50

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02/26/2025	T P BROWN	B190	Emails with client reps re LMIC letter and email to acknowledge receipt and ETA on response	0.20	297.00
02/26/2025	T P BROWN	B190	Review updated term sheet for any changes for final review and revise term sheet	1.80	2,673.00
02/26/2025	T P BROWN	B190	Review precedent from prior cases on term sheet plan and trust approach	1.70	2,524.50
02/26/2025	T P BROWN	B190	Emails to committee counsel and mediator re potential call on 2/27	0.20	297.00
02/26/2025	T P BROWN	B190	Consider strategy re term sheet related hearing	0.30	445.50
02/26/2025	T P BROWN	B190	Conferences with T.Long re proposed motion for scheduling conference and expedited hearing motion	0.40	594.00
02/26/2025	T P BROWN	B190	Conference with J.Rovira re final revisions to term sheet and related strategy	0.30	445.50
02/26/2025	T P BROWN	B190	Email to T.Long re revisions to motion and order	0.10	148.50
02/26/2025	T P BROWN	B190	Conference with C.Rankin re Exhibit B to term sheet and proposed circulation for approval	0.10	148.50
02/26/2025	J P ROVIRA	B190	Continue to address issues relating to potential resolution with Committee and attention to correspondence related to same.	1.00	1,100.00
02/26/2025	H P LONG, III	B190	Analyze and work on motion related to settlement term sheet	1.70	1,742.50
02/26/2025	H P LONG, III	B190	Analyze and comment on settlement term sheet	1.10	1,127.50
02/26/2025	C A RANKIN	B190	Further revise Exhibit B for 524(g) term sheet and circulate same to client and professionals group.	0.20	179.00

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02/27/2025	N S MONICO	B190	Conference with T.Brown regarding settlement negotiations and anticipated workflow in light of the same	0.30	208.50
02/27/2025	H P LONG, III	B190	Analyze joint status report for appeal of second interim stay order and related issues (.50), and communications with N. Miller regarding the same (.10)	0.60	615.00
02/27/2025	H P LONG, III	B190	Prepare for and participate in call with mediator and parties regarding settlement	1.10	1,127.50
02/27/2025	H P LONG, III	B190	Analyze revisions to settlement term sheet and strategy related to same	0.90	922.50
02/27/2025	T P BROWN	B190	Prepare for call with mediator and committee on term sheet discussions and draft related outline	0.70	1,039.50
02/27/2025	T P BROWN	B190	Conferences with T.Long re revisions to motion for status conference and emails with J.Rovira re same	0.30	445.50
02/27/2025	T P BROWN	B190	Emails and telephone calls with R.Barrett re mediation call and strategy	0.30	445.50
02/27/2025	T P BROWN	B190	Review revisions to motion for status conference and email to J.Rovira re same	0.30	445.50
02/27/2025	T P BROWN	B190	Email to J.Rovira re term sheet discussions and outline of outstanding issues	0.20	297.00
02/27/2025	T P BROWN	B190	Participate in mediation call	0.80	1,188.00
02/27/2025	T P BROWN	B190	Conference with J.Rovira re results of mediation call	0.30	445.50
02/27/2025	T P BROWN	B190	Emails with client and debtor reps re report on call with committee and mediator	0.30	445.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/27/2025	T P BROWN	B190	Emails to and from P.Barrett re call with mediator for 2/28 and re appeal	0.20	297.00
02/27/2025	T P BROWN	B190	Prepare for 3/5 hearings on extension of stay and exclusivity extensions and review transcripts and reply to motions	2.40	3,564.00
02/27/2025	T P BROWN	B190	Review proposed revisions on term sheet from other parties	0.40	594.00
02/27/2025	T P BROWN	B190	Review proposed D.Ct. report from committee and related emails with T.Long	0.10	148.50
02/27/2025	J P ROVIRA	B190	Prepare for and participate in mediation discussion with Committee (.8); discuss same with T. Brown and follow up emails and calls related to same (.5).	1.30	1,430.00
02/27/2025	H P LONG, III	B190	Analyze and prepare for March 5 hearing	0.70	717.50
02/28/2025	T P BROWN	B190	Review emails with K.Courington re La practice issues for term sheet	0.10	148.50
02/28/2025	T P BROWN	B190	Email with T.Long re objection to stay extension motion and related arguments	0.20	297.00
02/28/2025	T P BROWN	B190	Emails and call with T.Long and review numerous emails with debtor's counsel on term sheet negotiations	0.50	742.50
02/28/2025	T P BROWN	B190	Prepare for hearings on 3/5/25	0.40	594.00
02/28/2025	T P BROWN	B190	Review transcript of 9/10 testimony on stay extension motion	1.40	2,079.00
02/28/2025	T P BROWN	B190	Emails to T.Long re edits to term sheet	0.10	148.50
02/28/2025	H P LONG, III	B190	Analyze precedent related to revisions to plan set forth in term sheet and work on the same	2.70	2,767.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/28/2025	H P LONG, III	B190	Analyze objection from Hoffman to third interim order extending stay and strategy	0.50	512.50
02/28/2025	H P LONG, III	B190	Analyze objection from Rousell to third interim order extending stay and related strategy	0.60	615.00
02/28/2025	H P LONG, III	B190	Analyze revisions to settlement term sheet and strategy related to same	1.60	1,640.00
02/28/2025	J P ROVIRA	B190	Prepare for participate in mediation session (.8); attention to correspondence related to same and follow up discussions related to same (1.0); review revised term sheets and attention to correspondence related to same (.5).	2.30	2,530.00
02/28/2025	H P LONG, III	B190	Analyze proposed comments from Committee regarding approval of third interim order extending stay (.50), and communications with J. Leismer regarding the same (.10)	0.60	615.00
			TOTAL B190	163.80	
02/03/2025	N S MONICO	B210	Analyze correspondence/documenta tion regarding remaining funds in escrow settlement account in Louisiana (.6); consider strategies for accessing/resolving the same (.3); research the same (1.1)	2.00	1,390.00
02/13/2025	N S MONICO	B210	Research Mississippi law on escrow accounts (1.6); prepare summary of the same (.8)	2.40	1,668.00
02/18/2025	H P LONG, III	B210	Analyze and comment on monthly operating report (.70), and communications with D. Ramlijak regarding the same (.60)	1.30	1,332.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
02/20/2025	T P BROWN	B210	Conference with T.Long re MOR and preliminary review of same	0.10	148.50
02/20/2025	H P LONG, III	B210	Emails with C. Lascell and D. Ramlijak regarding monthly operating report	0.40	410.00
02/21/2025	H P LONG, III	B210	Analyze and finalize monthly operating report (.60), and communications with C. Lascell (.10) and Verita (.10) regarding the same	0.80	820.00
02/21/2025	T P BROWN	B210	Review proposed MOR and emails with T.Long re filing MOR	0.20	297.00
02/27/2025	T P BROWN	B210	Review C.Lascell invoice and related emails	0.10	148.50
			TOTAL B210	7.30	
02/11/2025	H P LONG, III	B320	Analyze and work on motion to extend exclusivity periods	3.10	3,177.50
02/13/2025	H P LONG, III	B320	Analyze and work on motion to extend exclusivity periods	2.30	2,357.50
02/18/2025	H P LONG, III	B320	Analyze and work on motion to extend exclusivity periods	1.20	1,230.00
02/19/2025	H P LONG, III	B320	Analyze and finalize motion to extend exclusivity periods	1.20	1,230.00
02/19/2025	J P ROVIRA	B320	Review motion to extend exclusivity and attention to correspondence related to same.	0.50	550.00
02/27/2025	H P LONG, III	B320	Analyze precedent related to revisions to plan and disclosure statement related to settlement term sheet	2.40	2,460.00
			TOTAL B320	10.70	
			TOTAL HOURS	210.30	

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TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
T P BROWN	Partner	82.00	1,485.00	121,770.00
J P ROVIRA	Partner	35.10	1,100.00	38,610.00
H P LONG, III	Counsel	62.20	1,025.00	63,755.00
N S MONICO	Associate	4.70	695.00	3,266.50
C A RANKIN	Associate	16.30	895.00	14,588.50
T L CANADA	Paralegal	10.00	410.00	4,100.00
TOTAL FEES (\$)				246,090.00

TIME SUMMARY BY TASK CODE:

CODE	DESCRIPTION	HOURS	VALUE
B110	Case Administration	12.50	8,665.00
B150	Meetings of and Communications with Creditors	1.10	1,127.50
B160	Fee / Employment Applications	14.90	14,586.50
B190	Other Contested Matters (excluding assumption / rejection motions)	163.80	204,491.50
B210	Business Operations	7.30	6,214.50
B320	Plan and Disclosure Statement (including Business Plan)	10.70	11,005.00
		210.30	246,090.00

FOR COSTS ADVANCED AND EXPENSES INCURRED:

CODE	DESCRIPTION	AMOUNT
E106	Online Research (Westlaw and Lexis)	343.36
E109	Local Travel	13.00
E111	Meals	16.99
E116	Trial Transcripts	33.00
E118	Litigation Support Vendors	1,968.75
TOTAL CURRENT EXPENSES (\$)		2,375.10

INVOICE SUMMARY:

Current Fees:	\$ 246,090.00
Current Charges:	2,375.10
CURRENT INVOICE AMOUNT DUE:	\$ 248,465.10