

**HUNTON ANDREWS KURTH LLP**

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**HUNTON ANDREWS KURTH LLP**

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*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)**  
:  
:  
:  
:

**EIGHTH 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 MARCH 1, 2025 THROUGH AND INCLUDING MARCH 31, 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:	March 1, 2025 through March 31, 2025
Total Fees Requested:	\$262,589.60 (80% of \$328,237.00)
Total Expenses Requested:	\$2,443.30
Type of Fee Statement:	Monthly <sup>1</sup>

<sup>1</sup> Notice of this Monthly Fee Statement shall be served in accordance with the Interim Compensation Order (as defined herein) and objections to payment of the amounts 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 March 1, 2025 through and including March 31, 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 \$328,237.00 and payment in the amount of \$262,589.60 (which equals 80% of the compensation sought herein). Hunton also seeks allowance and reimbursement of actual and necessary expenses in the amount of \$2,443.30.

**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 \$265,032.90, consisting of (i) \$262,589.60, 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) \$2,443.30 for actual and necessary costs and expenses.

*[Remainder of Page Intentionally Left Blank]*

Dated: April 28, 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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[crankin@HuntonAK.com](mailto:crankin@HuntonAK.com)

*Counsel for the Debtor and Debtor in Possession*

**EXHIBIT A**

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

<b>Matter Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
B110	Case Administration	18.2	\$12,683.50
B150	Meetings of and Communications with Creditors	4.7	\$5,064.50
B160	Fee / Employment Applications	22.3	\$21,845.50
B170	Fee / Employment Objections	0.1	\$148.50
B190	Other Contested Matters (excluding assumption / rejection motions)	124.5	\$155,347.50
B210	Business Operations	2.1	\$2,264.50
B310	Claims Administration and Objections	23.8	\$21,400.00
B320	Plan and Disclosure Statement (including Business Plan)	96.5	\$109,483.00
<b>Total</b>		<b>292.2</b>	<b>\$328,237.00</b>

**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	100.1	\$148,648.50
J. W. Harbour	Partner	2001	Bankruptcy	\$1,430	0.2	\$286.00
J. P. Rovira	Partner	2008	Bankruptcy	\$1,100	18.4	\$20,240.00
H. P. Long III	Counsel	2007	Bankruptcy	\$1,025	131.0	\$134,275.00
C. A. Rankin	Associate	2018	Bankruptcy	\$895	7.6	\$6,802.00
N. S. Monico	Associate	2023	Bankruptcy	\$695	12.9	\$8,965.50
<b>Totals</b>					<b>270.2</b>	<b>\$319,217.00</b>

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	22.0	\$9,020.00
<b>Totals</b>				<b>22.0</b>	<b>\$9,020.00</b>

**EXHIBIT C**

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

Type	Expenses
Copying	\$365.00
Online Research	\$95.00
Trial Transcripts	\$54.00
Litigation Support Vendors	\$1,929.30
<b>TOTAL EXPENSES:</b>	<b>\$2,443.30</b>

**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: 131824451  
DATE: 04/28/2025

CLIENT NAME: Hopeman Brothers, Inc.

BILLING ATTORNEY: TIMOTHY A DAVIDSON

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending March 31, 2025 per the attached itemization:

## CURRENT INVOICE SUMMARY:

### RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring

Current Fees:	\$ 328,237.00
Current Charges:	2,443.30
<b>CURRENT INVOICE AMOUNT DUE:</b>	<b>\$ 330,680.30</b>

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: 131824451, Date: 04/28/2025

# HUNTON ANDREWS KURTH

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## 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: 131824451, Date: 04/28/2025

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HOUSTON, TX 77002

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## INVOICE DETAIL

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BILLING ATTORNEY: TIMOTHY A DAVIDSON

## RE: (Hunton # 040312.0000007) Potential Bankruptcy or Restructuring

### FOR PROFESSIONAL SERVICES RENDERED THROUGH MARCH 31, 2025:

DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/03/2025	H P LONG, III	B110	Communications with chambers regarding March 5 hearing and Zoom access for the same	0.20	205.00
03/03/2025	T L CANADA	B110	Electronically file certificate of service of doc. no. 581	0.10	41.00
03/03/2025	T L CANADA	B110	Continue work on Agenda for March 5th hearing	0.90	369.00
03/04/2025	T L CANADA	B110	Finalize and electronically file Notice of Adjournment to March 5th hearing	0.50	205.00
03/04/2025	T L CANADA	B110	Prepare hearing materials for March 5, 2025 Hearing	3.00	1,230.00
03/05/2025	H P LONG, III	B110	Multiple communications with chambers regarding adjourning hearing (.40) and prepare and file notice of adjournment (.50)	0.90	922.50
03/05/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
03/06/2025	H P LONG, III	B110	Communications with counsel to party in interest regarding March 10 hearing time	0.20	205.00
03/06/2025	H P LONG, III	B110	Analyze and comment on agenda for March 10 hearing	0.60	615.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/06/2025	T L CANADA	B110	Electronically file certificate of service of doc. nos. 585, 586, 587, 588, 589	0.20	82.00
03/07/2025	T L CANADA	B110	Finalize and electronically file Agenda and the Witness and Exhibit List for the March 10th hearing	0.30	123.00
03/07/2025	T L CANADA	B110	Prepare hearing notebook for March 10th hearing	1.00	410.00
03/10/2025	H P LONG, III	B110	Communications with chambers regarding omnibus hearing dates and analyze related issues (.40) and analyze and finalize notice of the same (.20)	0.60	615.00
03/10/2025	T L CANADA	B110	Prepare hearing materials and exhibits in anticipation of March 10th hearing	1.00	410.00
03/10/2025	T L CANADA	B110	Finalize and submit orders granting Third Stay Order and Second Exclusivity Order	0.50	205.00
03/10/2025	T L CANADA	B110	Electronically file certificate of service of doc. nos. 609, 610, 611, 612, and 613	0.20	82.00
03/10/2025	T L CANADA	B110	Prepare and electronically file Notice of Additional Omnibus Hearing Dates for April through June	0.20	82.00
03/11/2025	T L CANADA	B110	Analysis of orders entered by the Court and communications with claims agent regarding service	0.10	41.00
03/11/2025	J P ROVIRA	B110	Prepare for and participate in weekly call with Stout team.	1.00	1,100.00
03/11/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
03/11/2025	T L CANADA	B110	Electronically file certificates of service for doc. nos. 597 and 604	0.20	82.00
03/11/2025	C A RANKIN	B110	Prepare for and attend weekly standing Hunton/Stout call.	0.70	626.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/12/2025	H P LONG, III	B110	Analyze issues related to March 20 omnibus hearing and strategy related to same	0.50	512.50
03/12/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
03/13/2025	T L CANADA	B110	Electronically file certificate of service of doc. no. 614	0.10	41.00
03/13/2025	T L CANADA	B110	Prepare draft of Notice of Adjournment of Chubb Settlement Motion hearing	0.70	287.00
03/14/2025	T L CANADA	B110	Communications with Court regarding transcript of March 10, 2025 Hearing	0.20	82.00
03/17/2025	T P BROWN	B110	Email to J.Rovira re adjournment of March 20 hearing	0.10	148.50
03/17/2025	H P LONG, III	B110	Communications with US Trustee regarding March 20 hearing and analyze issues related to March 20 hearing	0.50	512.50
03/17/2025	H P LONG, III	B110	Analyze certificates of service and communications with Verita regarding the same	0.30	307.50
03/18/2025	H P LONG, III	B110	Communications with chambers regarding cancellation of March 20 omnibus hearing	0.20	205.00
03/18/2025	T L CANADA	B110	Finalize and electronically file Notice of Adjournment of Matter Scheduled for Hearing on March 20, 2025	0.20	82.00
03/18/2025	T P BROWN	B110	Conference with T.Long re cancellation of 3/20 hearing	0.10	148.50
03/19/2025	T P BROWN	B110	Conference with T.Long re adjournment of 3/20 hearing	0.10	148.50
03/20/2025	T L CANADA	B110	Electronically file certificates of service of doc. nos. 616, 618, 622, and 623	0.30	123.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/25/2025	J P ROVIRA	B110	Prepare for and participate in weekly call with Stout to go over open issues.	0.80	880.00
03/25/2025	C A RANKIN	B110	Prepare for and participate in weekly Hunton/Stout conference to discuss works in progress.	0.50	447.50
03/25/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
03/26/2025	T L CANADA	B110	Electronically file certificate of service of doc. no. 631	0.10	41.00
03/27/2025	T L CANADA	B110	Electronically file certificate of service of doc. no. 635	0.10	41.00
03/27/2025	H P LONG, III	B110	Analyze certificate of service and communications with Verita regarding the same	0.20	205.00
<b>TOTAL B110</b>				<b>18.20</b>	
03/10/2025	C A RANKIN	B150	Analyze inbound from SCS regarding third party requesting data access for reporting and respond to SCS regarding same.	0.20	179.00
03/10/2025	T P BROWN	B150	Emails with Liberty's counsel re proposed call	0.10	148.50
03/12/2025	T P BROWN	B150	Prepare for call with LMIC and review POC and underlying agreements	1.20	1,782.00
03/18/2025	H P LONG, III	B150	Analyze and respond to questions from D. Cox regarding parties subject to confidentiality agreements and information that can be shared with such parties	0.30	307.50
03/18/2025	H P LONG, III	B150	Analyze and respond to questions from N. Miller at Caplin regarding filed proof of claim	0.40	410.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/25/2025	C A RANKIN	B150	Analyze and address various Committee inbounds regarding diligence requests (.5), and analyze open items regarding Committee diligence requests (.6).	1.10	984.50
03/25/2025	C A RANKIN	B150	Draft summary of numerous inbounds from creditors and parties in interest with summaries of reach out/dispute resolution status.	1.40	1,253.00
			<b>TOTAL B150</b>	<b>4.70</b>	
03/11/2025	H P LONG, III	B160	Analyze and update parties in interest list for retention of Future Claims Representative (.60), and communications with counsel to Committee regarding the same (.30)	0.90	922.50
03/11/2025	T P BROWN	B160	Work on FCR application and order and review other cases for precedent	1.20	1,782.00
03/11/2025	T P BROWN	B160	Emails with N.Miller re FCR application and order exemplar and review same	0.10	148.50
03/12/2025	T P BROWN	B160	Work on FCR application and review related precedent	1.60	2,376.00
03/13/2025	T L CANADA	B160	Communications with C. Rankin regarding Third Interim Fee Application (.2) and prepare Third Interim Fee Application (1.7)	1.90	779.00
03/13/2025	T P BROWN	B160	Work on FCR appointment application and proposed order and review precedent	1.70	2,524.50
03/13/2025	T P BROWN	B160	Emails with N.Miller and review online CV information on proposed FCR	0.30	445.50
03/13/2025	C A RANKIN	B160	Analyze upcoming interim fee application deadline and email debtors' professionals regarding same.	0.20	179.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/18/2025	C A RANKIN	B160	Analyze Stout's February monthly fee statement.	0.20	179.00
03/20/2025	T P BROWN	B160	Work on FCR application and related conferences and emails with T.Long re same	0.80	1,188.00
03/20/2025	H P LONG, III	B160	Analyze and comment on application to appoint future claimants representative	1.10	1,127.50
03/20/2025	C A RANKIN	B160	Analyze open items regarding Blank Rome February fee statement and emails with K. Brinkman regarding same (.3); analyze open items regarding CKSMM February fee statement and email T. Rader regarding same (.4).	0.70	626.50
03/21/2025	T P BROWN	B160	Review and provide comments on solicitation motion	1.50	2,227.50
03/21/2025	T P BROWN	B160	Review MLB fee statement	0.10	148.50
03/25/2025	T P BROWN	B160	Email from R.Barrett re fee statement for February	0.10	148.50
03/26/2025	H P LONG, III	B160	Analyze revisions from Committee to application for future claimants' representative	1.20	1,230.00
03/27/2025	H P LONG, III	B160	Analyze and comment on declaration in support of application of future claimants' representative	0.80	820.00
03/27/2025	T P BROWN	B160	Review committee email re proposed FCR candidate's declaration	0.20	297.00
03/27/2025	T L CANADA	B160	Work on Hunton's February monthly fee statement	1.60	656.00
03/27/2025	C A RANKIN	B160	Analyze and address open items regarding Hunton's February fee statement (.8) review February fee statement and circulate same to T. Brown (.2).	1.00	895.00



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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/29/2025	T P BROWN	B160	Review Hunton February fee statement and related email to C.Rankin	0.50	742.50
03/31/2025	T P BROWN	B160	Review fee statements and related emails with P.Barrett	0.30	445.50
03/31/2025	T L CANADA	B160	Work on Hunton's Third Interim fee application	2.50	1,025.00
03/31/2025	T L CANADA	B160	Email LEDES files for Hunton, Blank Rome, and CKSMM to the US Trustee	0.20	82.00
03/31/2025	T L CANADA	B160	Finalize and electronically file 7th monthly fee statements of Hunton, Blank Rome, CKSMM, and Stout	1.20	492.00
03/31/2025	C A RANKIN	B160	Analyze and proposed edits to Kutak's February fee statement (.2) coordinate filing of Hunton, Stout, Blank Rome, and CKSMM February fee statements (.2).	0.40	358.00
			<b>TOTAL B160</b>	<b>22.30</b>	
03/31/2025	T P BROWN	B170	Review Chubb objection to FTI fee statement	0.10	148.50
			<b>TOTAL B170</b>	<b>0.10</b>	
03/01/2025	T P BROWN	B190	Review emails re term sheet discussions with committee counsel and P.Barrett and review comments	0.50	742.50
03/02/2025	T P BROWN	B190	Review emails from and to committee counsel and debtor's counsel re proposed changes to settlement term sheet	0.40	594.00
03/03/2025	T P BROWN	B190	Participate in call with committee counsel and debtor counsel re term sheet revisions	0.80	1,188.00
03/03/2025	T P BROWN	B190	Emails to and from R.Van Epps re hearing prep and term sheet discussions	0.20	297.00

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03/03/2025	T P BROWN	B190	Review and revise witness and exhibit list and consider related strategy	0.40	594.00
03/03/2025	T P BROWN	B190	Work on term sheet revisions and related discussions	0.40	594.00
03/03/2025	T P BROWN	B190	Prepare for 3/5 hearings on extension motions	1.60	2,376.00
03/03/2025	T P BROWN	B190	Review and revise proposed reply brief in support of motions	1.30	1,930.50
03/03/2025	T P BROWN	B190	Review response of Chubb re exclusivity and consider related arguments	1.80	2,673.00
03/03/2025	T P BROWN	B190	Review objections to stay extension motion and consider responses	1.40	2,079.00
03/03/2025	T P BROWN	B190	Conference with J.Rovira re term sheet discussions and related emails with J.Rovira	0.50	742.50
03/03/2025	J W HARBOUR	B190	Analysis of term sheet and related issues including concerning upcoming hearing and communications with counsel	0.20	286.00
03/03/2025	J P ROVIRA	B190	Prepare for and participate in mediation call (.6); attention to correspondence related to finalizing term sheet (.8); multiple follow up discussions related to same (.4).	1.80	1,980.00
03/03/2025	H P LONG, III	B190	Analyze and work on omnibus reply in support of third interim stay extension order	4.80	4,920.00
03/03/2025	H P LONG, III	B190	Analyze revisions to settlement term sheet and related strategy (1.10) and prepare for and participate in call with Committee professionals related to same (.60)	1.70	1,742.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/03/2025	H P LONG, III	B190	Analyze issues related to exhibits and witnesses for March 5 hearing (.90), and communications with K. Courington regarding the same (.40)	1.30	1,332.50
03/03/2025	T P BROWN	B190	Call with mediator and related emails to P.Barrett and J.Rovira re proposed call	0.30	445.50
03/03/2025	T P BROWN	B190	Call with P.Barrett, J.Rovira and T.Long re strategy after committee call	0.30	445.50
03/03/2025	T P BROWN	B190	Conference with J.Harbour re exclusivity issue for 3/5 hearing	0.20	297.00
03/03/2025	T P BROWN	B190	Conference with T.Long re reply strategy and evidence needed	0.30	445.50
03/04/2025	T P BROWN	B190	Emails with R.Van Epps re alternative term sheet provision on CIP agreements	0.20	297.00
03/04/2025	T P BROWN	B190	Review prior settlement agreement for revision to term sheet provision	0.50	742.50
03/04/2025	T P BROWN	B190	Emails with C.Lascell re term sheet revisions	0.10	148.50
03/04/2025	T P BROWN	B190	Emails with committee and T.Long re adjournment request and chambers call	0.20	297.00
03/04/2025	T P BROWN	B190	Work on witness/exhibit list for hearings	0.10	148.50
03/04/2025	H P LONG, III	B190	Prepare for and participate in call with mediator (.80) and analyze revisions to settlement term sheet (1.10)	1.90	1,947.50
03/04/2025	H P LONG, III	B190	Communications with chambers regarding adjourning March 5 hearing	0.40	410.00
03/04/2025	H P LONG, III	B190	Analyze and respond to questions from Committee counsel regarding exhibit to settlement term sheet	0.60	615.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/04/2025	H P LONG, III	B190	Prepare for March 5 hearing (1.40), and communications with K. Courington regarding the same (.40)	1.80	1,845.00
03/04/2025	H P LONG, III	B190	Analyze and update motion for expedited status conference on mediation	1.10	1,127.50
03/04/2025	H P LONG, III	B190	Analyze and work on omnibus reply in support of third interim stay order	1.30	1,332.50
03/04/2025	J P ROVIRA	B190	Prepare for and participate in call relating to settlement (.5); attention to correspondence related to finalizing same (.9).	1.40	1,540.00
03/04/2025	T P BROWN	B190	Emails with K.Courington on La. lawsuits and depositions to perpetuate testimony	0.20	297.00
03/04/2025	T P BROWN	B190	Revise term sheet to address committee/trust indemnity issues	0.60	891.00
03/04/2025	T P BROWN	B190	Numerous emails with P.Barrett re term sheet revisions and related strategy	0.30	445.50
03/04/2025	T P BROWN	B190	Call with mediator re status of committee consideration and comments on term sheet	0.50	742.50
03/04/2025	T P BROWN	B190	Prepare for hearings on 3/6 and review cases cited by objectors	2.40	3,564.00
03/04/2025	T P BROWN	B190	Revise proposed adjournment notice and related conference with T.Canada and T.Long	0.20	297.00
03/04/2025	T P BROWN	B190	Conference with J.Rovira re changes to term sheet requested by committee counsel	0.30	445.50
03/04/2025	T P BROWN	B190	Prepare for and participate in call with mediator and committee	1.00	1,485.00

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03/04/2025	T P BROWN	B190	Revise proposed reply brief on extension motions	0.70	1,039.50
03/04/2025	T P BROWN	B190	Telephone calls with P.Barrett re term sheet discussions and mediator call	0.40	594.00
03/04/2025	T P BROWN	B190	Conferences with T.Long re agenda, witness and exhibit list and mediator call	0.40	594.00
03/05/2025	N S MONICO	B190	Analyze state court dockets regarding prepetition crossclaims	0.20	139.00
03/05/2025	T P BROWN	B190	Emails with mediator re term sheet and hearing issues	0.30	445.50
03/05/2025	T P BROWN	B190	Numerous emails and calls with P.Barrett re hearing and settlement discussions	1.20	1,782.00
03/05/2025	T P BROWN	B190	Review dockets on direct action claims vs. former D&Os and related emails with P.Barrett	1.40	2,079.00
03/05/2025	T P BROWN	B190	Conferences with T.Long re hearing strategy	0.30	445.50
03/05/2025	T P BROWN	B190	Prepare for hearings on extension motions and potential status conference on mediation	1.70	2,524.50
03/05/2025	T P BROWN	B190	Conference with J.Rovira re settlement negotiations and outstanding issues	0.40	594.00
03/05/2025	C A RANKIN	B190	Analyze inbound from T. Long regarding further information regarding parties listed on Exhibit B to Committee term sheet and draft response regarding same.	0.40	358.00
03/05/2025	T P BROWN	B190	Review proposed revisions to term sheet and consider related issues and strategy	1.60	2,376.00
03/05/2025	T P BROWN	B190	Emails with mediator and with T.Long re adjournment of hearings	0.10	148.50
03/05/2025	T P BROWN	B190	Emails to debtor reps re adjournment of hearing	0.20	297.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/05/2025	T P BROWN	B190	Telephone call with C.Lascell and P.Barrett re revisions to term sheet	0.40	594.00
03/05/2025	T P BROWN	B190	Telephone call to R.Van Epps re term sheet revisions and email to C.Lascell re same	0.30	445.50
03/05/2025	T P BROWN	B190	Email to J.Rovira re consents to relief requested at hearing and related call with P.Barrett	0.10	148.50
03/05/2025	T P BROWN	B190	Emails with mediator re proposals and call on issues outstanding	0.10	148.50
03/05/2025	T P BROWN	B190	Emails with K.Courington re La. lawsuit and perpetuation depositions and consider issues re same	0.20	297.00
03/05/2025	H P LONG, III	B190	Prepare for hearing on motion for third interim order extending stay	3.40	3,485.00
03/05/2025	H P LONG, III	B190	Analyze issues related to revisions to term sheet and related strategy	1.80	1,845.00
03/06/2025	H P LONG, III	B190	Analyze revisions to term sheet and strategy related to same	0.90	922.50
03/06/2025	H P LONG, III	B190	Analyze and update omnibus reply in support of motion for third interim order extending stay	0.50	512.50
03/06/2025	H P LONG, III	B190	Analyze and update motion for expedited status conference on mediation	0.70	717.50
03/06/2025	H P LONG, III	B190	Analyze and work on exhibit and witness list for hearing on exclusivity motion and motion for third interim order extending stay	0.90	922.50
03/06/2025	H P LONG, III	B190	Analyze and respond to email from counsel to objecting party regarding issues related to hearing on motion for third interim order extending stay and objection to same	1.70	1,742.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/06/2025	H P LONG, III	B190	Prepare for and participate in call with mediator	1.20	1,230.00
03/06/2025	T P BROWN	B190	Emails with T.Long re hearing adjournment and related issues and complaints	0.30	445.50
03/06/2025	T P BROWN	B190	Emails with P.Barrett to coordinate on term sheet and filings	0.20	297.00
03/06/2025	T P BROWN	B190	Emails with C.Lascell, Stout and P.Barrett re term sheet revisions and approvals	0.20	297.00
03/06/2025	T P BROWN	B190	Emails with committee and Hll re sign offs on term sheet	0.20	297.00
03/06/2025	T P BROWN	B190	Emails with committee counsel re sharing term sheet with objecting parties	0.10	148.50
03/06/2025	T P BROWN	B190	Calls with P.Barrett and mediator to prepare for calls to resolve term sheet issues	0.60	891.00
03/06/2025	T P BROWN	B190	Telephone calls with P.Barrett re changes to term sheet and potential revisions strategy and revise same	1.30	1,930.50
03/06/2025	T P BROWN	B190	Prepare for and participate in mediation calls with committee, Hll and debtor counsel	2.40	3,564.00
03/06/2025	T P BROWN	B190	Review stipulated dismissal for D.Ct. appeal and related emails with committee	0.10	148.50
03/06/2025	T P BROWN	B190	Prepare for 3/10/25 hearing and review case law from objectors and Chubb response	3.30	4,900.50
03/06/2025	T P BROWN	B190	Emails with Chubb's counsel re hearing on 3/10	0.10	148.50
03/06/2025	T P BROWN	B190	Emails with P.Barrett re mediation issues	0.30	445.50
03/06/2025	T P BROWN	B190	Conferences with T.Long re hearing and mediation strategy	0.50	742.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/07/2025	T L CANADA	B190	Finalize and electronically file Motion to Expediate Status Conference and Notice regarding same	0.20	82.00
03/07/2025	T L CANADA	B190	Finalize and electronically file Omnibus Rely in Support of Third Interim Stay Order	0.10	41.00
03/07/2025	T P BROWN	B190	Numerous emails with committee counsel re term sheet	0.30	445.50
03/07/2025	T P BROWN	B190	Review and revise pleadings to file for 3/10 hearing	1.70	2,524.50
03/07/2025	T P BROWN	B190	Emails and telephone call with M.Mintz re term sheet and 3/10 hearing	0.40	594.00
03/07/2025	T P BROWN	B190	Emails with Choate re LMIC mediation request and requested call and related call with T.Long	0.20	297.00
03/07/2025	T P BROWN	B190	Telephone call with committee counsel re confirmation of proposed provision re books and records and related emails with committee counsel	0.20	297.00
03/07/2025	T P BROWN	B190	Emails with mediator and with mediation parties re finalizing and filing term sheet	0.30	445.50
03/07/2025	T P BROWN	B190	Conferences with T.Long to finalize filings for term sheet and 3/10 hearing	0.30	445.50
03/07/2025	T P BROWN	B190	Telephone call with T.Long re M.Mintz call and request	0.20	297.00
03/07/2025	T P BROWN	B190	Emails to C.Lascell and R.Van Epps re term sheet progress and discussions with objectors	0.20	297.00
03/07/2025	T P BROWN	B190	Email to Roussel firm and local counsel re term sheet	0.20	297.00
03/07/2025	T P BROWN	B190	Emails with committee counsel re discussions with other creditors re term sheet	0.10	148.50



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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/07/2025	T P BROWN	B190	Prepare for hearings on 3/10 and work on related argument outline	2.40	3,564.00
03/07/2025	T P BROWN	B190	Revise term sheet for signatures and email same to T.Long and T.Canada for filing	0.20	297.00
03/07/2025	J P ROVIRA	B190	Attention to correspondence related to mediation and potential settlement.	0.80	880.00
03/08/2025	T P BROWN	B190	Work on argument outline, review cases and otherwise prepare for hearings on 3/10/25	3.80	5,643.00
03/08/2025	T P BROWN	B190	Emails with committee, Chubb and La. objectors' lawyer and client reps re start time for adjourned 3/10 hearing and related conferences with T.Long	0.30	445.50
03/08/2025	H P LONG, III	B190	Analyze email from counsel regarding adjourning start time of March 10 hearing and strategy (.40), communications with chambers regarding same (.20), and prepare and finalize notice of adjournment (.50)	1.10	1,127.50
03/09/2025	T P BROWN	B190	Review and consider proposal from M.Mintz and review docket for Simoneaux case	0.60	891.00
03/09/2025	T P BROWN	B190	Emails with T.Long re settlement options	0.30	445.50
03/09/2025	T P BROWN	B190	Prepare for hearing on motions to extend exclusivity and stay periods and term sheet presentation	4.80	7,128.00
03/09/2025	T P BROWN	B190	Conference with T.Long re settlement strategy and proposed terms	0.20	297.00
03/09/2025	T P BROWN	B190	Emails with M.Mintz re settlement proposal	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/09/2025	H P LONG, III	B190	Prepare for hearing on motion to extend stay (.70), and prepare draft of email to counsel to objecting party regarding same (.60)	1.30	1,332.50
03/10/2025	T P BROWN	B190	Attend and participate in 3/10 hearing	1.50	2,227.50
03/10/2025	T P BROWN	B190	Emails with J.Rovira and client reps re hearing results	0.20	297.00
03/10/2025	T P BROWN	B190	Emails with Roussel counsel re settlement discussions and proposed call	0.10	148.50
03/10/2025	T P BROWN	B190	Conference with T.Long re Omni hearing dates	0.10	148.50
03/10/2025	T P BROWN	B190	Prepare for hearing on term sheet, exclusivity extensions and extension of stay motions	3.10	4,603.50
03/10/2025	H P LONG, III	B190	Analyze and prepare redline of third interim order incorporating revisions requested from Committee	0.40	410.00
03/10/2025	H P LONG, III	B190	Communications with counsel to Liberty Mutual requesting case update and call related to same	0.40	410.00
03/10/2025	H P LONG, III	B190	Prepare for and participate in March 10 hearing	3.10	3,177.50
03/10/2025	J P ROVIRA	B190	Attention to correspondence related to extension of stay motion.	0.80	880.00
03/10/2025	T P BROWN	B190	Conferences with T.Long re preparation for hearing and re settlement discussions	0.40	594.00
03/11/2025	T P BROWN	B190	Telephone call with Todd Phillips re timeline for plan and consider related issues and settlement negotiations	0.40	594.00
03/11/2025	T P BROWN	B190	Email to T.Phillips re settlement discussions with creditor on stay issues	0.10	148.50

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/11/2025	T P BROWN	B190	Conference with J.Rovira re appeal strategy, disclosure statement and plan issues and FCR motion	0.50	742.50
03/11/2025	T P BROWN	B190	Telephone call with J.Clement and G.Roussel re appeal and plan issues	0.40	594.00
03/11/2025	T P BROWN	B190	Emails and conferences with T.Long re document production protocols and agreements to same	0.30	445.50
03/11/2025	H P LONG, III	B190	Analyze request from counsel to party in interest for documents in connection with plan, including related provisions of protective orders and compliance with same (.80), and prepare and send response to the same (.60)	1.40	1,435.00
03/11/2025	J P ROVIRA	B190	Attention to correspondence related to proposed schedule for confirmation process.	0.70	770.00
03/12/2025	T P BROWN	B190	Emails with P.Barrett re Roussel call results	0.10	148.50
03/12/2025	T P BROWN	B190	Emails with P.Barrett re dismissal of appeal and related email with J.Rovira	0.10	148.50
03/12/2025	H P LONG, III	B190	Prepare for and participate in call with counsel to Liberty Mutual	0.80	820.00
03/12/2025	H P LONG, III	B190	Analyze and prepare production requested by counsel to party in interest	0.80	820.00
03/13/2025	T L CANADA	B190	Prepare production of documents for Rousell attorneys	0.60	246.00
03/13/2025	T P BROWN	B190	Emails with T.Long and related conference with T.Long re Roussel document requests and authorization	0.20	297.00
03/13/2025	T P BROWN	B190	Emails with J.Clement re authorizations for document protocols	0.10	148.50

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03/13/2025	H P LONG, III	B190	Continue to analyze and prepare production for counsel to party in interest (.80), and communications with counsel to party in interest regarding the same (.40)	1.20	1,230.00
03/14/2025	H P LONG, III	B190	Finalize and send production to counsel for party in interest	0.80	820.00
03/14/2025	T P BROWN	B190	Review email from T.Long re production of requested agreements to Roussel firm	0.10	148.50
03/14/2025	T L CANADA	B190	Finalize production of documents for Rousell attorneys	0.10	41.00
03/17/2025	T P BROWN	B190	Review Chubb email re access to documents produced to committee	0.10	148.50
03/17/2025	H P LONG, III	B190	Analyze demand for documents from counsel to party in interest and issues related to production of same	0.70	717.50
03/18/2025	J P ROVIRA	B190	Review letter from Liberty concerning claim and attention to correspondence related to same.	0.80	880.00
03/18/2025	H P LONG, III	B190	Communications with counsel to Chubb Insurers regarding adjournment of settlement motion (.40), and analyze and finalize notice of the same (.40)	0.80	820.00
03/18/2025	H P LONG, III	B190	Analyze letter from counsel to Liberty regarding its alleged claim and issues related to the same	0.60	615.00
03/18/2025	T P BROWN	B190	Emails with K.Courington re extension of stay and term sheet and defense issues	0.20	297.00
03/18/2025	T P BROWN	B190	Conference with T.Long re adjournment of hearing and Chubb documents request	0.20	297.00
03/18/2025	T P BROWN	B190	Participate in call with Stout on open issues	0.40	594.00

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03/18/2025	T P BROWN	B190	Conference with T.Long re protocol issues and requests for documents	0.30	445.50
03/18/2025	T P BROWN	B190	Emails with committee and J.Rovira re Roussel appeal and related discussions and documents	0.40	594.00
03/18/2025	T P BROWN	B190	Emails with J.Rovira re LMIC position and related calls and emails with LMIC counsel	0.30	445.50
03/18/2025	T P BROWN	B190	Conference with T.Long re Chubb hearing, discovery requests and proposed response re same	0.30	445.50
03/19/2025	T P BROWN	B190	Consider responses to LMIC position on defense obligation and related conference with N.Monico	0.50	742.50
03/19/2025	T P BROWN	B190	Email with N.Monico re LMIC position letter on claim	0.10	148.50
03/20/2025	C A RANKIN	B190	Analyze developments regarding revised plan and supporting documents.	0.20	179.00
03/25/2025	T L CANADA	B190	Analysis of document production tracker chart and ensure all document requests have been resolved.	0.50	205.00
03/25/2025	T L CANADA	B190	Prepare production of all documents produced to the Committee for Chubb with links and encryption key	1.50	615.00
03/25/2025	H P LONG, III	B190	Analyze and respond to email from counsel to Chubb insurers regarding adjournment and deadlines related to Chubb insurers settlement motion	0.90	922.50
03/25/2025	H P LONG, III	B190	Analyze and prepare documents for production in response to document request	1.60	1,640.00
03/25/2025	T P BROWN	B190	Conferences and emails with J.Rovira re Roussel appeal and deadlines	0.30	445.50

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03/25/2025	T P BROWN	B190	Emails and conferences with T.Long re Chubb document requests	0.50	742.50
03/26/2025	T P BROWN	B190	Emails with R.Barrett re Roussel appeal	0.20	297.00
03/26/2025	T P BROWN	B190	Conference with J.Rovira re UST call and re Roussel and committee discussions	0.40	594.00
03/28/2025	T L CANADA	B190	Prepare production of all documents produced to the Committee to Chubb	0.50	205.00
03/31/2025	H P LONG, III	B190	Analyze issues and strategy related to solicitation and confirmation of 524(g) plan	0.80	820.00
03/31/2025	H P LONG, III	B190	Analyze brief filed by Rousell claimants in appeal	0.80	820.00
03/31/2025	H P LONG, III	B190	Analyze and prepare production of documents to counsel to Chubb (2.10) and prepare draft email to counsel to Chubb related to same (.70)	2.80	2,870.00
03/31/2025	T P BROWN	B190	Review Roussel brief on appeal	0.50	742.50
03/31/2025	T P BROWN	B190	Emails with T.Long re Chubb discovery requests	0.20	297.00
03/31/2025	T L CANADA	B190	Finalize production of all documents produced to the Committee to Chubb	1.20	492.00
03/31/2025	C A RANKIN	B190	Analyze Chubb Insurers objection to Committee's fee statement.	0.40	358.00
<b>TOTAL B190</b>				<b>124.50</b>	
03/12/2025	T P BROWN	B210	Emails with C.Lascell and conference with T.Long re cash transfer to maintain sub-account at Citizens Bank	0.10	148.50
03/20/2025	H P LONG, III	B210	Analyze and comment on monthly operating report (.60) and communications with D. Damlijak regarding the same (.20)	0.80	820.00
03/21/2025	T P BROWN	B210	Review draft MOR	0.10	148.50

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03/21/2025	H P LONG, III	B210	Analyze and finalize monthly operating report (.60), and communications with D. Ramlijak and C. Lascell regarding the same (.20)	0.80	820.00
03/21/2025	C A RANKIN	B210	Analyze February MOR.	0.20	179.00
03/27/2025	T P BROWN	B210	Review C.Lascell invoice	0.10	148.50
			<b>TOTAL B210</b>	<b>2.10</b>	
03/10/2025	T P BROWN	B310	Review LMIC claim and consider strategy re same	0.50	742.50
03/10/2025	T P BROWN	B310	Conference with T.Long and consider potential claim objections	0.40	594.00
03/12/2025	N S MONICO	B310	Consider basis for Liberty Mutual claim and potential grounds for objection	0.40	278.00
03/12/2025	T P BROWN	B310	Conference with N.Monico re documents and arguments for claims objection strategy	0.50	742.50
03/12/2025	T P BROWN	B310	Conference with T.Long re objection strategy and related issues	0.40	594.00
03/12/2025	T P BROWN	B310	Telephone call with Choate lawyers re LMIC issues and plan	0.50	742.50
03/13/2025	T P BROWN	B310	Consider strategy on claim objection and related estimation motion	0.30	445.50
03/19/2025	N S MONICO	B310	Analyze Liberty mutual proof of claim (.2); analyze correspondence from liberty mutual counsel regarding its claim (.2)	0.40	278.00
03/20/2025	N S MONICO	B310	Analyze settlement agreements Liberty Mutual alleges support its purported claim	1.20	834.00
03/24/2025	H P LONG, III	B310	Analyze issues and strategy related to filed and scheduled claims and objections to same (1.00), and communications with Verita regarding the same (.40)	1.40	1,435.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/25/2025	H P LONG, III	B310	Communications with Verita regarding claims register (.50) and analyze same (1.10)	1.60	1,640.00
03/25/2025	N S MONICO	B310	Prepare objection to Liberty Mutual Claim	3.50	2,432.50
03/25/2025	H P LONG, III	B310	Analyze issues and strategy related to claim filed by insurer and objection to same	0.90	922.50
03/25/2025	H P LONG, III	B310	Analyze issues and strategy related to filed asbestos claims	1.30	1,332.50
03/26/2025	N S MONICO	B310	Prepare objection to claim of Liberty Mutual	2.60	1,807.00
03/26/2025	N S MONICO	B310	Discuss potential revisions to Liberty Mutual claim objection with T.Brown	0.40	278.00
03/28/2025	H P LONG, III	B310	Analyze issues related to objection to filed asbestos claim and analyze and comment on same	3.30	3,382.50
03/28/2025	N S MONICO	B310	Finalize asbestos personal injury claims objection	1.10	764.50
03/28/2025	N S MONICO	B310	Revise Liberty Mutual Claim Objection	2.00	1,390.00
03/31/2025	N S MONICO	B310	Finalize Liberty Mutual claim objection	1.10	764.50
			<b>TOTAL B310</b>	<b>23.80</b>	
03/10/2025	H P LONG, III	B320	Analyze precedent and strategy for plan documents	2.60	2,665.00
03/10/2025	H P LONG, III	B320	Analyze and draft proposed timeline for plan and trust documents and related hearings	0.90	922.50
03/10/2025	T P BROWN	B320	Consider timeline for plan presentation	0.40	594.00
03/11/2025	T P BROWN	B320	Participate in call with Stout and consider plan related issues	0.70	1,039.50
03/11/2025	T P BROWN	B320	Draft and revise proposed plan timeline and emails with J.Rovira re same	0.50	742.50



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03/11/2025	H P LONG, III	B320	Analyze and work on timeline and strategy for plan and trust documents and related hearings on the same	0.70	717.50
03/11/2025	H P LONG, III	B320	Analyze and work on section 524(g) plan of reorganization	2.30	2,357.50
03/12/2025	H P LONG, III	B320	Analyze and work on disclosure statement related to 524(g) plan	3.10	3,177.50
03/12/2025	T P BROWN	B320	Emails with J.Rovira re potential timeline for plan documents and related email to committee counsel	0.20	297.00
03/12/2025	H P LONG, III	B320	Analyze and work on 524(g) plan (2.40) and communications with counsel to Committee regarding the same (.40)	2.80	2,870.00
03/13/2025	T P BROWN	B320	Work on plan and disclosure statement issues	2.20	3,267.00
03/13/2025	T P BROWN	B320	Conferences with T.Long re plan and disclosure statement preparation and related issues and related definitions	0.50	742.50
03/13/2025	H P LONG, III	B320	Continue to analyze and work on section 524(g) plan	3.20	3,280.00
03/13/2025	H P LONG, III	B320	Analyze precedent related to disclosure statement to support 524(g) plan and work on same	3.80	3,895.00
03/14/2025	T P BROWN	B320	Work on disclosure statement inserts on contentions of parties	1.80	2,673.00
03/14/2025	T P BROWN	B320	Email to K.Montgomery re term sheet and proposed exit strategy	0.10	148.50
03/15/2025	T P BROWN	B320	Emails with J.Rovira re plan timeline and committee communications re same	0.10	148.50
03/17/2025	J P ROVIRA	B320	Review and revise proposed chapter 11 plan reflecting settlement with Committee.	2.70	2,970.00

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03/17/2025	H P LONG, III	B320	Analyze and work on 524(g) plan	3.40	3,485.00
03/17/2025	H P LONG, III	B320	Analyze and work on disclosure statement for 524(g) plan	3.90	3,997.50
03/17/2025	T P BROWN	B320	Conference with T.Long re plan and disclosure statement and related issues	0.50	742.50
03/17/2025	T P BROWN	B320	Emails with J.Rovira re plan and disclosure statement drafts	0.20	297.00
03/17/2025	T P BROWN	B320	Work on FCR application, plan and disclosure statement	1.40	2,079.00
03/18/2025	J P ROVIRA	B320	Continue to review and comment on chapter 11 plan incorporating Committee settlement and attention to correspondence related to same.	2.80	3,080.00
03/18/2025	H P LONG, III	B320	Analyze and work on 524(g) plan	1.60	1,640.00
03/18/2025	H P LONG, III	B320	Analyze and work on disclosure statement to support 524(g) plan	2.40	2,460.00
03/18/2025	T P BROWN	B320	Telephone call with K.Courington re term sheet issues	0.20	297.00
03/18/2025	T P BROWN	B320	Review plan and related comments and provide comments and questions	1.20	1,782.00
03/18/2025	T P BROWN	B320	Draft contentions insert to proposed disclosure statement	1.50	2,227.50
03/18/2025	T P BROWN	B320	Conference with T.Long re disclosure statement insert	0.10	148.50
03/19/2025	H P LONG, III	B320	Analyze and work on disclosure statement for 524(g) plan	3.80	3,895.00
03/19/2025	H P LONG, III	B320	Analyze issues and precedent related to solicitation procedures for 524(g) plan and work on motion	2.10	2,152.50

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03/19/2025	T P BROWN	B320	Work on plan and disclosure statement	1.90	2,821.50
03/19/2025	T P BROWN	B320	Emails with R. Van Epps re insurance issues for plan	0.10	148.50
03/19/2025	T P BROWN	B320	Review T.Long email re plan revisions	0.20	297.00
03/19/2025	T P BROWN	B320	Emails and call with K.Courington re plan and term sheet strategy and related issues	0.30	445.50
03/19/2025	T P BROWN	B320	Email with T.Long re strategy on plan and disclosure filing	0.10	148.50
03/19/2025	T P BROWN	B320	Conference call with J.Rovira and T.Long re plan and disclosure statement	0.40	594.00
03/19/2025	H P LONG, III	B320	Analyze and work on 524(g) plan	3.20	3,280.00
03/19/2025	J P ROVIRA	B320	Review revised Plan (1.0); discuss same and additional changes with T. Long (1.0).	1.80	1,980.00
03/20/2025	T P BROWN	B320	Telephone call with committee counsel re FCR, timeline and related plan issues	0.30	445.50
03/20/2025	T P BROWN	B320	Email to J.Rovira re FCR app and plan/disclosure statement issues	0.20	297.00
03/20/2025	T P BROWN	B320	Emails with T.Long re comments on disclosure statement and related issues	0.20	297.00
03/20/2025	T P BROWN	B320	Conferences with T.Long re solicitation motion, plan and disclosure statement	0.50	742.50
03/20/2025	T P BROWN	B320	Work on solicitation motion	1.40	2,079.00
03/20/2025	T P BROWN	B320	Work on plan and disclosure statement	2.40	3,564.00
03/20/2025	H P LONG, III	B320	Analyze and work on solicitation procedures motion for combined hearing on 524(g) plan and disclosure statement	4.80	4,920.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/20/2025	H P LONG, III	B320	Analyze and work on disclosure statement in support of 524(g) plan (1.60) and communications with C. Lascell regarding the same (.20)	1.80	1,845.00
03/20/2025	H P LONG, III	B320	Analyze and work on 524(g) plan (1.10) and communications with C. Lascell regarding the same (.20)	1.30	1,332.50
03/21/2025	T P BROWN	B320	Emails with UST re plan discussion	0.10	148.50
03/21/2025	T P BROWN	B320	Emails with T.Long and C.Lascell re plan documents sent for review to C.Lascell and committee	0.20	297.00
03/21/2025	H P LONG, III	B320	Prepare and send email to counsel to committee with drafts of plan documents (.60), and communications with C. Lascell regarding the same (.30)	0.90	922.50
03/21/2025	H P LONG, III	B320	Analyze and work on disclosure statement in support of 524(g) plan	2.10	2,152.50
03/21/2025	H P LONG, III	B320	Analyze and work on solicitation procedures motion	2.80	2,870.00
03/25/2025	J P ROVIRA	B320	Discuss issues relating to potential plan structure with counsel for Committee (.5); address issues relating to same (.5).	1.00	1,100.00
03/25/2025	T P BROWN	B320	Review revisions to FCR appointment motion from committee counsel	0.30	445.50
03/25/2025	T P BROWN	B320	Emails with K.Montgomery	0.10	148.50
03/26/2025	T P BROWN	B320	Prepare for and participate in call with UST re proposed plan pursuant to term sheet	1.00	1,485.00
03/26/2025	H P LONG, III	B320	Analyze and work on solicitation procedures motion for 524(g) plan	2.60	2,665.00

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DATE	TIMEKEEPER	TASK	DESCRIPTION	HOURS	VALUE
03/26/2025	H P LONG, III	B320	Analyze issues related to strategy and deadlines for plan and trust documents related to 524(g) plan	0.90	922.50
03/26/2025	J P ROVIRA	B320	Address issues relating to strategy for dealing with closing Resolute Settlement and impact on Plan and discuss same with T. Brown.	1.00	1,100.00
03/27/2025	H P LONG, III	B320	Analyze and comment on disclosure statement in support of 524(g) plan	1.80	1,845.00
03/27/2025	H P LONG, III	B320	Analyze and comment on solicitation procedures motion and exhibits to the same	3.20	3,280.00
03/28/2025	H P LONG, III	B320	Analyze and comment on proposed draft of trust agreement from Committee	1.80	1,845.00
03/31/2025	H P LONG, III	B320	Analyze and comment on draft trust agreement related to 524(g) plan	1.10	1,127.50
03/31/2025	J P ROVIRA	B320	Review draft trust agreement for Plan from Committee.	1.00	1,100.00
<b>TOTAL B320</b>				<b>96.50</b>	
<b>TOTAL HOURS</b>				<b>292.20</b>	

**TIMEKEEPER SUMMARY:**

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
T P BROWN	Partner	100.10	1,485.00	148,648.50
J W HARBOUR	Partner	0.20	1,430.00	286.00
J P ROVIRA	Partner	18.40	1,100.00	20,240.00
H P LONG, III	Counsel	131.00	1,025.00	134,275.00
N S MONICO	Associate	12.90	695.00	8,965.50
C A RANKIN	Associate	7.60	895.00	6,802.00
T L CANADA	Paralegal	22.00	410.00	9,020.00
<b>TOTAL FEES (\$)</b>				<b>328,237.00</b>

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**TIME SUMMARY BY TASK CODE:**

CODE	DESCRIPTION	HOURS	VALUE
B110	Case Administration	18.20	12,683.50
B150	Meetings of and Communications with Creditors	4.70	5,064.50
B160	Fee / Employment Applications	22.30	21,845.50
B170	Fee / Employment Objections	0.10	148.50
B190	Other Contested Matters (excluding assumption / rejection motions)	124.50	155,347.50
B210	Business Operations	2.10	2,264.50
B310	Claims Administration and Objections	23.80	21,400.00
B320	Plan and Disclosure Statement (including Business Plan)	96.50	109,483.00
		<b>292.20</b>	<b>328,237.00</b>

**FOR COSTS ADVANCED AND EXPENSES INCURRED:**

CODE	DESCRIPTION	AMOUNT
E101	Copying	365.00
E106	Online Research	95.00
E116	Trial Transcripts	54.00
E118	Litigation Support Vendors	1,929.30
	<b>TOTAL CURRENT EXPENSES (\$)</b>	<b>2,443.30</b>

**INVOICE SUMMARY:**

Current Fees:	\$ 328,237.00
Current Charges:	2,443.30
<b>CURRENT INVOICE AMOUNT DUE:</b>	<b>\$ 330,680.30</b>