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**CAMPBELL & LEVINE, LLC**

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

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

IN RE:	)	
	)	
HOPEMAN BROTHERS, INC.	)	CASE NO. 24-32428-KLP
	)	
DEBTOR.	)	
	)	

**SECOND MONTHLY FEE STATEMENT OF CAMPBELL &  
LEVINE, LLC AS COUNSEL TO THE FUTURE CLAIMANTS'  
REPRESENTATIVE FOR THE PERIOD JULY 1, 2025 THROUGH JULY 31, 2025**

Name of Applicant:	Campbell & Levine, LLC
Name of Client:	FCR
Date of Retention:	June 18, 2025, effective as of May 15, 2025
Time Period Covered:	July 1, 2025 through July 31, 2025
Total Fees Requested:	\$45,516.40 (80% of \$58,145.50)
Total Expenses Requested:	\$3,914.08
Type of Fee Statement:	Monthly in accordance with the Interim Compensation Order



AND NOW, comes Campbell & Levine, LLC (the “Applicant”), counsel to Marla Rosoff Eskin, as Future Claimants’ Representative (the “FCR”) for the estate of the debtor, Hopeman Brothers, Inc. (the “Debtor”), pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Rules”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief*, entered September 9, 2024 [Dkt. 162] (the “Interim Compensation Order”) and submits this Second Monthly Fee Statement (this “Fee Statement”) for the reasonable and necessary legal services rendered by the Applicant for the period July 1, 2025, through July 31, 2025 (the “Application Period”) and reimbursement of the actual and necessary expenses that the Applicant incurred during the Application Period.

By this Fee Statement, the Applicant seeks payment of its reasonable and necessary legal fees and expenses incurred during the Application in the total amount of \$50,430.48, consisting of (i) \$46,516.40, which is 80% of the fees incurred by the Applicant for reasonable and necessary legal services to the FCR during the Application Period, and (ii) \$3,914.08 for actual and necessary costs and expenses.

**Itemization of Services and Legal Fees Incurred**

1. In support of this Fee Statement, the Applicant has attached:
  - a. A summary schedule of hours and fees incurred by the Applicant during this Application period, categorized by nature of the legal services performed, as Exhibit A.
  - b. A summary schedule of hours expended by all attorneys and paralegals related

to the Applicant's representation of the FCR during the Application Period, attached hereto as Exhibit B.

- c. A summary of all expenses incurred by the Applicant during the Application Period, attached hereto as Exhibit C.
- d. Detailed invoices for the hours expended and fees incurred, as well as expenses incurred, by the Applicant during the Application Period.

### **Representations**

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

### **Notice**

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

WHEREFORE, the Applicant requests payment of its reasonable fees and expenses incurred during the Application Period in the amount of \$50,430.48, consisting of (i) \$46,516.40, which is 80% of the fees incurred by the Applicant for reasonable and necessary legal services to the FCR during the Application Period, and (ii) \$3,914.08 for actual and necessary costs and expenses.

Dated: August 14, 2025

Respectfully submitted,

/s/ Michael G. Wilson

Michael G. Wilson (VSB No. 48927)

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

**EXHIBIT A**

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

<b>Task Code</b>	<b>Matter Description</b>	<b>Hours</b>	<b>Fees Requested</b>
.01	Plan of Reorganization	51.0	\$29,270.50
.02	Liberty Mutual Declaratory Judgment Action	48.2	\$27,525.00
.03	Travel	3.0	\$1,350.00
<b>TOTAL</b>		102.2	\$58,145.50

**EXHIBIT B**

**Professionals Rendering Services During the Fee Period**

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

<b>Professional</b>	<b>Position</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Douglas A. Campbell	Member	\$900.00	1.9	\$1,710.00
David B. Salzman	Member	\$825.00	38.3	\$31,597.50
Kathryn L. Harison	Member	\$450.00	30.4	\$13,680.00
Fred D. Rapone	Counsel	\$475.00	10.0	\$4,750.00
Marla R. Eskin	Member	\$800.00	2.4	\$1,920.00
Joseph C. Bacharach	Associate	\$275.00	12.6	\$3,465.00
Heather L. Jiuliente	Paralegal	\$155.00	6.6	\$1,023.00
		<b>Total</b>	<b>102.2</b>	<b>\$58,145.50</b>

**EXHIBIT C**

**Summary of Expenses**

<b>Type</b>	<b>Amount</b>
Travel Related Expenses	\$1,350.00
Westlaw/Pacer and Related Office Expenses	\$2,876.03

**EXHIBIT D**

**Statements for July 1, 2025 through July 31, 2025**



**CAMPBELL  
& LEVINE, LLC** | Attorneys at Law

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Hopeman Brother, Inc.

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

Costs and Expenses

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

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Hopeman Brother, Inc.

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

Plan of Reorganization

PREVIOUS BALANCE \$109,845.00

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

## Plan of Reorganization

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

## Plan of Reorganization

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

## RECAPITULATION

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

TOTAL CURRENT WORK 29,270.50

BALANCE DUE \$139,115.50

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Hopeman Brother, Inc.

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

Liberty Declaratory Judgment Action

PREVIOUS BALANCE \$9,437.50

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

## Liberty Declaratory Judgment Action

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

Liberty Declaratory Judgment Action

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

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

TOTAL CURRENT WORK 27,525.00

BALANCE DUE \$36,962.50

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Hopeman Brother, Inc.

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

Travel

PREVIOUS BALANCE \$13,200.00

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

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

TOTAL CURRENT WORK 1,350.00

BALANCE DUE \$14,550.00

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Hopeman Brother, Inc.

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

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

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