

CAPLIN & DRYSDALE, CHARTERED

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

*Counsel for the Official
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**SUMMARY OF FIFTH INTERIM APPLICATION OF
CAPLIN & DRYSDALE, CHARTERED FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM JUNE 1, 2025, THROUGH AUGUST 31, 2025**

Name of Applicant:	Caplin & Drysdale, Chartered
Authorized to provide professional services to:	Official Committee of Unsecured Creditors
Petition Date:	June 30, 2024
Date of Retention:	Order entered September 12, 2024, effective as of July 22, 2024
Period for which Compensation and Reimbursement are sought:	June 1, 2025, through August 31, 2025
Amount of Compensation sought as actual, reasonable and necessary:	<u>\$976,635.50</u>
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	<u>\$27,624.78</u>



Total compensation approved by interim order to date:	<u>\$3,414,566.50</u>
Total expenses approved by interim order to date:	<u>\$73,696.23</u>
Blended rate in this Application for all attorneys:	<u>\$1,089.22</u>
Blended rate in this Application for all timekeepers:	<u>\$1,088.90</u>
Compensation sought in this Application already paid pursuant to the interim compensation order but not yet allowed:	<u>\$0.00</u>
Expenses sought in this Application already paid pursuant to the interim compensation order but not yet allowed:	<u>\$0.00</u>
Number of professionals included in this Application:	9
If applicable, number of professionals in this Application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought during the Application Period:	N/A
Number of professionals billing fewer than 15 hours to the case during the Application Period:	<u>4</u>

CAPLIN & DRYSDALE, CHARTERED

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

*Counsel for the Official
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**FIFTH INTERIM APPLICATION OF
CAPLIN & DRYSDALE, CHARTERED FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM JUNE 1, 2025, THROUGH AUGUST 31, 2025**

Caplin & Drysdale, Chartered (“**Caplin**”), counsel to the Official Committee of Unsecured Creditors (the “**Committee**”), submits this application (the “**Application**”) for interim allowance of compensation for professional services rendered to the Committee for the period from June 1, 2025, through August 31, 2025 (the “**Application Period**”), and reimbursement of actual and necessary expenses incurred by Caplin during the Application Period 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 the United States Bankruptcy Court of the Eastern District of Virginia (the “**Local Rules**”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for*

Retained Professionals and (II) Granting Related Relief entered on September 9, 2024 [Docket No. 162] (the “**Interim Compensation Order**”). In support of this Application, Caplin represents as follows:

JURISDICTION AND BASIS FOR RELIEF

1. This Court has subject-matter jurisdiction to hear and decide this Application under 28 U.S.C. §§ 157(a) and 1334(b) and the Standing Order of Reference from the United States District Court for the Eastern District of Virginia, dated August 15, 1984. This matter is a core proceeding under 28 U.S.C. § 157(b), and this Court has authority to adjudicate this Application consistent with Article III of the United States Constitution.

2. The bases for the relief requested herein are sections 330, 331, 503(b)(2), and 507(a)(2) of the Bankruptcy Code, Rule 2016 of the Bankruptcy Rules, Rule 2016-1 of the Local Rules, and the Interim Compensation Order.

BACKGROUND

3. On June 30, 2024, the Debtor filed a petition for relief under chapter 11 of the Bankruptcy Code, commencing the above-captioned chapter 11 case (the “**Chapter 11 Case**”). The largest creditor constituency in the Chapter 11 Case consists of holders of claims for personal injury or wrongful death arising from exposure to asbestos or asbestos-containing products.

4. On July 22, 2024, the Office of the United States Trustee for Region 4 notified the Court that, pursuant to 11 U.S.C. § 1102, it had appointed the Committee. [Docket No. 69].

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

6. On September 12, 2024, the Court entered the Order Authorizing the Retention and Employment of Caplin & Drysdale, Chartered as Counsel to the Official Committee of Unsecured Creditors, Effective *Nunc Pro Tunc* as of July 22, 2024 [Docket No. 202].

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

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

9. The Compensation Procedures also provide that all Retained Professionals (as defined in the Interim Compensation Order), to the extent applicable, shall make reasonable efforts to comply with the U.S. Trustee's requests for information and additional disclosures set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the "**Appendix B Guidelines**") in connection with the interim and final fee applications filed in this case.

RELIEF REQUESTED

10. Caplin submits this Application (a) for interim allowance of reasonable compensation for the actual, reasonable and necessary professional services that it has rendered as counsel to the Committee in this case for the Application Period, and (b) for reimbursement of actual, reasonable and necessary expenses incurred during that same period. For the period covered by this Application, Caplin seeks fees for services rendered in the amount of \$976,635.50 and reasonable and necessary expenses totaling \$27,624.78.

11. The Application is supported by the following exhibits, which are attached hereto and patterned on the Appendix B Guidelines:

- **Exhibit A** is a contains a summary schedule of the time expended by Caplin’s attorneys and paraprofessionals during the Application Period.
- **Exhibit B** contains a summary schedule of hours and fees covered by this Application, categorized by project code.
- **Exhibit C** is a summary of the expenses incurred by Caplin during the Application Period.
- **Exhibit D** contains a disclosure of “customary and comparable compensation” charged by Caplin’s professionals and paraprofessionals. As requested in the Appendix B Guidelines, Exhibit D provides a summary of the blended hourly rates of the timekeepers (segregated by rank) included in this Application compared to the blended hourly rates for similar non-bankruptcy domestic timekeepers.
- **Exhibit E** contains the monthly fee statements (the “**Monthly Statements**”) served by Caplin during the Application Period.

BASIS FOR RELIEF REQUESTED

12. During the Application Period, Caplin provided numerous services to the Committee, including but not limited to (i) drafting, revising, researching, and analyzing materials related to the plan, disclosure statement, solicitation procedures, plan exhibits, trust issues and trust-related documents, including the trust distribution procedures and trust agreement, and communicating with other Committee professionals, the Debtor, and the Future Claimants’ Representative about these and related issues; (ii) drafting, revising, researching, and analyzing associated papers, including briefs in support of confirmation of the plan, proposed findings and conclusions related thereto, and objections and responses to written discovery requests related thereto; (iii) preparing for and attending depositions related thereto; (iv) litigating and researching contested issues relating to Liberty Mutual’s adversary proceeding; (v) litigating and researching the Chubb Insurers’ appeal of the order appointing the Future Claimants’ Representative; (vi) litigating and researching contested issues relating to claim objections, including to Liberty

Mutual Insurance Company's claim; (vii) participating in conferences with the Debtor and other professionals regarding contested issues; (viii) communicating with co-counsel as well as the Committee and the Committee's co-chairs about case strategy and respective tasks; (ix) preparing and reviewing its own monthly and interim fee requests and reviewing the monthly and interim fee requests of other Committee professionals; (x) working and communicating with other Committee professionals on issues related to their respective areas of expertise; (xi) preparing for and attending status conferences and hearings on various matters on behalf of the Committee, including the confirmation hearing; and (xii) meeting with and advising the Committee on these and other issues, and responding to Committee inquiries.

13. Pursuant to the terms of the Interim Compensation Order, Caplin filed and served Monthly Statements as follows:

Period Covered by Monthly Statement	Date Filed [Docket No.]	Objection Deadline	Total Fees	Total Expenses	Fees Received (80%)	Expenses Received (100%)
6/1-6/30/25	8/1/25 [Dkt No. 1083]	8/15/25	\$349,354.00	\$10,165.80	\$0.00	\$0.00
7/1-7/31/25	9/16/25 [Dkt No. 1199]	9/30/25	\$301,753.50	\$1,395.73	\$0.00	\$0.00
8/1-8/31/25	9/24/25 [Dkt No. 1215]	10/8/25	\$325,528.00	\$16,063.25	\$0.00	\$0.00

14. The time and expense detail related to this Application is attached hereto as Exhibit E. The fees charged by Caplin in this Chapter 11 Case are billed in accordance with its existing billing rates and procedures in effect during the Application Period. Caplin believes that the time and expense entries included in Exhibit E comply with the requirements of Local Rule 2016-1.

15. During the Application Period, Caplin received no payment and no promises of payment from any source for services rendered or to be rendered in any capacity whatsoever with respect to the matters covered by this Application.

LEGAL BASIS FOR REQUESTED RELIEF

16. Under 11 U.S.C. § 330(a)(1), the Court may award reasonable compensation for actual, necessary services rendered by professionals employed by the Committee, including attorneys and paralegals employed by such attorneys based on the nature, extent, and value of the services rendered; time spent on such services; and the cost of comparable services other than in a bankruptcy case. The Court may also award reimbursement for actual, necessary expenses. *Id.*

17. Section 330(a)(3) provides:

In determining the amount of reasonable compensation to be awarded to an examiner, trustee under chapter 11, or professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—

(A) the time spent on such services;

(B) the rates charged for such services;

(C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

(D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

18. The professional services performed by Caplin were necessary and appropriate to the administration of this Chapter 11 Case and were performed in the most expeditious and economical manner possible. Compensation for these services as requested is commensurate with the complexity, importance, and nature of the problems, issues, or tasks involved. Further, the

professionals at Caplin have coordinated their activities with Committee's other professionals to avoid undue duplication of effort on behalf of the Committee in the case whenever possible.

19. In accordance with 11 U.S.C. § 504 and Bankruptcy Rule 2016(a), there is no agreement or understanding between Caplin and any other person, other than the members of Caplin, for the sharing of compensation to be received for services rendered in this Chapter 11 Case.

20. No agreement or understanding prohibited by 18 U.S.C. § 155 has been or will be made by Caplin.

STATEMENT PURSUANT TO APPENDIX B GUIDELINES

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

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

Response: No, Caplin did not vary its standard or customary billing rates, fees, or terms for services pertaining to this engagement.

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

Response: Not applicable.

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

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billed records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: The fees reflected in billing code number .07, titled Fee Applications-Self, relate to Caplin's preparation of fee applications as well as review and revision of its invoices.

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

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

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

Response: Yes.

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

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

NOTICE

22. Notice of this Application has been provided in accordance with the terms of the Interim Compensation Order. Caplin submits that no other or further notice need be provided.

[remainder of page intentionally left blank]

CONCLUSION

23. WHEREFORE, Caplin respectfully requests that the Court enter an Order (a) approving this Application and allowing on an interim basis Caplin's request for \$976,635.50 in fees and reimbursement of \$27,624.78 in expenses for the Application Period; (b) authorizing and directing the Debtor to pay the as-yet unpaid balances for the Application Period; and (c) granting such other and further relief as the Court deems just and proper.

Dated: October 15, 2025

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)

Todd E. Phillips (admitted *pro hac vice*)

Jeffrey A. Liesemer (VSB No. 35918)

Nathaniel R. Miller (admitted *pro hac vice*)

CAPLIN & DRYSDALE, CHARTERED

1200 New Hampshire Avenue NW, 8th Floor
Washington, DC 20036

Telephone: (202) 862-5000

Facsimile: (202) 429-3301

kmaclay@capdale.com

tphillips@capdale.com

jliesemer@capdale.com

nmiller@capdale.com

Counsel for the Official

Committee of Unsecured Creditors

CAPLIN & DRYSDALE, CHARTERED

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

*Counsel for the Official
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**ORDER GRANTING FIFTH INTERIM APPLICATION OF
CAPLIN & DRYSDALE, CHARTERED FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM JUNE 1, 2025, THROUGH AUGUST 31, 2025**

Upon consideration of the Fifth Interim Application (the “**Application**”)¹ of Caplin & Drysdale, Chartered (“**Caplin**”), counsel for the Official Committee of Unsecured Creditors, for the period from June 1, 2025, through August 31, 2025 (the “**Application Period**”); and the Court having reviewed the Application and the Monthly Statements that were served by Caplin, and finding that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining that proper and adequate notice has been given and that no other or further notice is necessary; and after due deliberation thereon; and good and sufficient cause appearing therefor,

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

IT IS HEREBY ORDERED as follows:

1. The Application is GRANTED.
2. Caplin is hereby granted interim allowance of compensation for professional services in the amount of \$976,635.50 and reimbursement of actual and necessary expenses in the amount of \$27,624.78 as requested in the Application.
3. The Debtor is hereby authorized and directed to remit to Caplin the full amount of the fees and expenses set forth in paragraph 2 of this Order less any amounts previously paid to Caplin on account of monthly fee statements filed during the Application Period.
4. The Debtor is authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.
5. The Court shall retain jurisdiction to hear and determine all matters arising from the entry of the within Order, including the interpretation, implementation, or enforcement of the within Order.
6. This Order shall be immediately effective and enforceable upon its entry.

Dated: _____, 2025
Richmond, Virginia

HONORABLE KEITH L. PHILLIPS
UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

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

*Counsel for the Official
Committee of Unsecured Creditors*

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

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

/s/ Jeffrey A. Liesemer

EXHIBIT A

SUMMARY BY PROFESSIONAL¹ - JUNE 1, 2025, THROUGH AUGUST 31, 2025

COMPENSATION BY PROFESSIONAL				
NAME OF PROFESSIONAL	POSITION / AREA OF PRACTICE / YEAR OF ADMISSION	HOURLY BILLING RATE	TOTAL HOURS	TOTAL COMPENSATION
Ann C. McMillan	Member / Bankruptcy / Member of California Bar: 1984; Member of District of Columbia Bar: 1988	\$1,200	29.8	\$35,760.00
Kevin C. Maclay	Member / Bankruptcy / Member of Maryland Bar: 1994; Member of District of Columbia Bar: 1996	\$1,970	6.8	\$13,396.00
Todd E. Phillips	Member / Bankruptcy / Member of California Bar: 2005; Member of District of Columbia Bar: 2009; Member of New York Bar: 2016	\$1,455	78.2	\$113,781.00
Jeffrey A. Liesemer	Member / Bankruptcy / Member of Virginia Bar: 1993; Member of District of Columbia Bar: 1996	\$760	7.2	\$5,472.00
Jeffrey A. Liesemer	Member / Bankruptcy / Member of Virginia Bar: 1993; Member of District of Columbia Bar: 1996	\$1,520	298.9	\$454,328.00
James P. Wehner	Member / Bankruptcy / Member of Virginia Bar: 1995; Member of District of Columbia Bar: 1997; Member of New York Bar: 2003	\$1,520	7.7	\$11,704.00
Nathaniel R. Miller	Of Counsel / Bankruptcy / Member of California Bar: 2016; Member of District of Columbia Bar: 2017	\$405	3.2	\$1,296.00
Nathaniel R. Miller	Of Counsel / Bankruptcy / Member of California Bar: 2016; Member of District of Columbia Bar: 2017	\$810	319.9	\$259,119.00
Katy C. Zende	Of Counsel / Bankruptcy / Member of Texas Bar: 2017; Member of District of Columbia Bar: 2020	\$760	9.2	\$6,992.00
Matthew E. Beckerman	Associate / Bankruptcy / Member of New Jersey Bar: 2022; Member of District of Columbia Bar: 2024	\$550	135.5	\$74,525.00
Rachael L. Davis	Paralegal / Bankruptcy / N/A	\$525	0.5	\$262.50
TOTAL			896.9	\$976,635.50

¹ Nonworking travel time is billed at one-half of the professional's usual hourly rate.

EXHIBIT B

SUMMARY BY PROJECT CATEGORY - JUNE 1, 2025, THROUGH AUGUST 31, 2025

PROJECT CATEGORY	HOURS	FEES
(.01) Asset Analysis & Recovery	0.0	\$0.00
(.02) Asset Disposition	0.0	\$0.00
(.03) Business Operations	0.0	\$0.00
(.04) Case Administration & Calendar Control	0.2	\$291.00
(.05) Claims Administration & Objections	0.9	\$729.00
(.06) Employee Benefits/Pensions	0.0	\$0.00
(.07) Fee Applications - Self	11.7	\$16,925.00
(.08) Objections - Fee/Retention Applications	0.0	\$0.00
(.09) Financing	0.0	\$0.00
(.10) Litigation	455.7	\$475,411.00
(.11) Plan & Disclosure Statement	342.5	\$385,078.50
(.12) Relief from Stay Proceedings	0.0	\$0.00
(.13) Tax Issues	0.0	\$0.00
(.15) Committee Meetings/Conferences	63.9	\$80,722.50
(.16) Travel	10.4	\$6,768.00
(.17) Docket Review & File Maintenance	0.0	\$0.00
(.18) Fee Applications - Others	11.6	\$10,710.50
(.19) Retention Applications - Others	0.0	\$0.00
(.20) Retention Applications - Self	0.0	\$0.00
(.21) Fee Auditor	0.0	\$0.00
TOTAL	896.9	\$976,635.50

EXHIBIT C

SUMMARY OF EXPENSES - JUNE 1, 2025, THROUGH AUGUST 31, 2025

EXPENSE CATEGORY	AMOUNT
Court Reporter Transcript Services	\$5,746.60
Database Research	\$6,035.49
PACER Service	\$246.30
Photocopies	\$654.29
Travel	\$14,942.10
TOTAL	\$27,624.78

EXHIBIT D

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURE

CATEGORY OF TIMEKEEPER	BLENDED HOURLY RATE FOR PRECEDING YEAR, EXCLUDING BANKRUPTCY (DC OFFICE)	BLENDED HOURLY RATE DURING THE APPLICATION PERIOD
Member	\$919.68	\$1,480.26
Of Counsel	\$765.28	\$804.72
Associate	\$492.51	\$550.00
Paralegal	\$426.03	\$525.00

EXHIBIT E

CAPLIN & DRYSDALE, CHARTERED

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

*Counsel for the Official
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**ELEVENTH MONTHLY FEE STATEMENT OF
CAPLIN & DRYSDALE, CHARTERED FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM JUNE 1, 2025, THROUGH JUNE 30, 2025**

Name of Applicant:	Caplin & Drysdale, Chartered
Name of Client:	Official Committee of Unsecured Creditors
Date of retention order entered:	September 12, 2024, effective as of July 22, 2024 [Docket No. 202]
Time Period Covered:	June 1, 2025, through June 30, 2025
Total Fees Requested:	<u>\$349,354.00</u>
Total Expenses Requested:	<u>\$10,165.80</u>
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 Caplin & Drysdale, Chartered (“**Caplin**”), as counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in this chapter 11 case, hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) seeking interim payment of (i) \$279,483.20 (80% of \$349,354.00) as compensation for professional services rendered to the Committee and (ii) \$10,165.80 for reimbursement of actual and necessary expenses, for a total of \$289,649.00 for the period from June 1, 2025, through June 30, 2025 (the “**Fee Period**”).

ITEMIZATION OF SERVICES RENDERED AND DISBURSEMENTS INCURRED

1. In support of this Monthly Fee Statement, Caplin 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 providing certain information regarding the Caplin attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Monthly Fee Statement.
 - **Exhibit C** is a summary of the expenses incurred by Caplin during the Fee Period.
 - **Exhibit D** consists of Caplin’s detailed records of fees incurred during the Fee Period, including the number of hours expended (on an aggregate basis) by Caplin members, of counsel, associates, 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. Caplin 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, Caplin respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$289,649.00, consisting of (i) \$279,483.20, which is 80% of the fees incurred for reasonable and necessary professional services rendered by Caplin during the Fee Period, and (ii) \$10,165.80 for actual and necessary costs and expenses.

Dated: August 1, 2025

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)

Todd E. Phillips (admitted *pro hac vice*)

Jeffrey A. Liesemer (VSB No. 35918)

Nathaniel R. Miller (admitted *pro hac vice*)

CAPLIN & DRYSDALE, CHARTERED

1200 New Hampshire Avenue NW, 8th Floor

Washington, DC 20036

Telephone: (202) 862-5000

Facsimile: (202) 429-3301

kmaclay@capdale.com

tphillips@capdale.com

jliesemer@capdale.com

nmiller@capdale.com

Counsel for the Official

Committee of Unsecured Creditors

EXHIBIT A

SUMMARY OF FEES BY PROJECT CATEGORY

JUNE 1, 2025, THROUGH JUNE 30, 2025

PROJECT CATEGORY	HOURS	FEES
(.02) Asset Disposition	0.0	\$0.00
(.03) Business Operations	0.0	\$0.00
(.04) Case Administration & Calendar Control	0.2	\$291.00
(.05) Claims Administration & Objections	0.9	\$729.00
(.06) Employee Benefits/Pensions	0.0	\$0.00
(.07) Fee Applications - Self	2.0	\$3,219.00
(.08) Objections - Fee/Retention Applications	0.0	\$0.00
(.09) Financing	0.0	\$0.00
(.10) Litigation	222.3	\$236,907.50
(.11) Plan & Disclosure Statement	58.9	\$69,410.50
(.12) Relief from Stay Proceedings	0.0	\$0.00
(.13) Tax Issues	0.0	\$0.00
(.15) Committee Meetings/Conferences	27.3	\$35,238.00
(.16) Travel	4.2	\$2,766.00
(.17) Docket Review & File Maintenance	0.0	\$0.00
(.18) Fee Applications - Others	1.3	\$793.00
(.19) Retention Applications - Others	0.0	\$0.00
(.20) Retention Applications - Self	0.0	\$0.00
TOTAL	317.1	\$349,354.00

EXHIBIT B

SUMMARY OF FEES BY PROFESSIONAL²

JUNE 1, 2025, THROUGH JUNE 30, 2025

COMPENSATION BY PROFESSIONAL				
NAME OF PROFESSIONAL	POSITION / ADMISSION DATE / DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS	TOTAL COMPENSATION
Ann C. McMillan	Member / 1984 / Bankruptcy	\$1,200	18.3	\$21,960.00
Kevin C. Maclay	Member / 1994 / Bankruptcy	\$1,970	2.0	\$3,940.00
Todd E. Phillips	Member / 2005 / Bankruptcy	\$1,455	33.6	\$48,888.00
Jeffrey A. Liesemer	Member / 1993 / Bankruptcy	\$760	3.0	\$2,280.00
Jeffrey A. Liesemer	Member / 1993 / Bankruptcy	\$1,520	92.8	\$141,056.00
James P. Wehner	Member / 1995 / Bankruptcy	\$1,520	3.4	\$5,168.00
Nathaniel R. Miller	Of Counsel / 2016 / Bankruptcy	\$405	1.2	\$486.00
Nathaniel R. Miller	Of Counsel / 2016 / Bankruptcy	\$810	138.6	\$112,266.00
Matthew E. Beckerman	Associate / 2022 / Bankruptcy	\$550	24.2	\$13,310.00
TOTAL			317.1	\$349,354.00

COMPENSATION BY PARAPROFESSIONAL				
NAME OF PROFESSIONAL	POSITION / ADMISSION DATE / DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS	TOTAL COMPENSATION
TOTAL			0.0	\$0.00

² Nonworking travel time is billed at one-half of the professional's usual hourly rate.

EXHIBIT C

SUMMARY OF EXPENSES INCURRED DURING THE FEE PERIOD

EXPENSE CATEGORY	AMOUNT
Court Reporter Transcript Services	\$1,379.90
Database Research	\$3,800.74
Photocopies	\$364.22
Travel	\$4,286.17
Meals	\$334.77
TOTAL	\$10,165.80

EXHIBIT D

CAPLIN & DRYSDALE

1200 New Hampshire Avenue NW 8th Floor
Washington, DC 20036

Telephone: (202) 862-5000

Federal Tax I.D. No.: 52-1226629

www.capdale.com

Fax: (202) 429-3301

Official Committee of Unsecured Creditors of Hopeman Brothers, Inc.

Invoice #: 362498

Page: 1

RE: Hopeman Brothers, Inc. bankruptcy

For Professional Services Rendered Through June 30, 2025

Total Services	\$349,354.00
Total Disbursements	\$10,165.80
Total Current Charges	\$359,519.80

Remittance Advice

[Payment is due upon receipt. If you should have any questions, please email accounting@capdale.com.](mailto:accounting@capdale.com)

Check Payable To:

Caplin & Drysdale, Chartered
Attn: Accounts Receivable
1200 New Hampshire Avenue NW 8th Floor
Washington, DC 20036

Wire Transfer:

Receiving Bank: Bank of America
ABA Wire Routing Number: 026009593
ABA ACH Routing Number: 054001204
Swift Code: BOFAUS3N
Beneficiary: Caplin & Drysdale, Chartered
Account Number: 001920814809

Credit Card:

We accept all major card companies. A service fee of 2.4% for Corporate Cards and 2.95% for Individual Cards will be added to all payments.

Please return this remittance page with your payment. Thank you.

CAPLIN & DRYSDALE

1200 New Hampshire Avenue NW 8th Floor
Washington, DC 20036

Telephone: (202) 862-5000

Federal Tax I.D. No.: 52-1226629

www.capdale.com

Fax: (202) 429-3301

Official Committee of Unsecured Creditors of Hopeman Brothers, Inc.

July 30, 2025

Invoice #: 362498

Page: 1

RE: Hopeman Brothers, Inc. bankruptcy

For Professional Services Rendered Through June 30, 2025

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.04 Case Administration & Calendar Control					
6/25/2025	TEP	Confer w/ T. Brown re case admin issue (.1); communicate w/ KCM, JAL, and NRM re same (.1).	0.2	\$1,455.00	\$291.00
Total			0.20		\$291.00
.05 Claims Administration & Objections					
6/4/2025	NRM	Communicate w/ JAL re claim objections (.1); communications w/ KNF re same (.1); research re same (.4); communications w/ JAL and KNF re same (.3).	0.9	\$810.00	\$729.00
Total			0.90		\$729.00
.07 Fee Applications-Self					
6/1/2025	KCM	Review/edit April monthly fee app.	0.6	\$1,970.00	\$1,182.00
6/21/2025	TEP	Review and edit monthly fee application.	0.6	\$1,455.00	\$873.00
6/22/2025	TEP	Review and edit monthly fee application (.7); communications w/ JAG re same (.1).	0.8	\$1,455.00	\$1,164.00
Total			2.00		\$3,219.00
.10 Litigation					
6/2/2025	MEB	Communicate w/ NRM re memo re discovery issue (.1); communicate w/ TEP, JAL, and NRM re same (.1); communicate w/ NRM re confirmation discovery responses (.2).	0.4	\$550.00	\$220.00
6/3/2025	JAL	Review and analyze confirmation-related discovery issues.	0.5	\$1,520.00	\$760.00
6/3/2025	TEP	Communicate w/ C&D team re confirmation discovery and review same.	0.3	\$1,455.00	\$436.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/3/2025	MEB	Communicate w/ NRM re joinder to Debtor's objection to Liberty's motion to withdraw the reference (.1); draft same (.4); communicate w/ NRM re same (.1).	0.6	\$550.00	\$330.00
6/4/2025	JAL	Confer w/ NRM re Liberty adversary proceeding (.1); develop strategy re same (1.4); review and analyze discovery issues re responses and objections (.9); communicate w/ KCM, TEP, and NRM re Liberty adversary proceeding (.1); communicate w/ NRM re discovery matters and next steps (.1); review and analyze motion for fourth interim stay order (.6); communicate w/ KCM, TEP, and NRM re same and related issues (.4).	3.6	\$1,520.00	\$5,472.00
6/4/2025	TEP	Review insurer discovery (.1); confer w/ D. Salzman re PO issue (.1); communications w/ FCR re PO (.3); communicate w/ D. Cox and J. Raskin re FCR meeting (.1).	0.6	\$1,455.00	\$873.00
6/4/2025	NRM	Confer w/ T. Long re Liberty Mutual adversary proceeding and confirmation discovery (multiple) (.2); confer w/ JAL re same (.1); communications w/ TEP, JAL, and KCM re strategy (.1); communications w/ TEP, JAL, and KCM re Liberty Mutual adversary proceeding (.3); communications w/ TEP re same (.1); communicate w/ MEB re motion to withdraw the reference opposition and confirmation written discovery (.5); communicate w/ JAL re correspondence w/ Debtor's counsel (.1); draft and revise objection to motion to withdraw the reference (1.9); research re same (1.2); communications w/ JAL, TEP, MEB, and CG re same (.1); correspond w/ M. Eskin, TEP, D. Salzman, and ACM re confidentiality issues (.1); research re same (.1); correspond w/ T. Long, T. Brown, and JAL re confirmation discovery (.2).	5.0	\$810.00	\$4,050.00
6/5/2025	JAL	Communications w/ NRM, T. Brown, and K. Finnerty re requested extension on motion to withdraw reference (.3); communications w/ J. Raskin and D. Cox re next steps in Liberty adversary proceeding (.3); review and analyze NRM communication and accompanying materials re same (1.2); teleconference w/ J. Raskin re same (.1).	1.9	\$1,520.00	\$2,888.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/5/2025	MEB	Communication w/ NRM and JDS re Debtor's motion to extend automatic stay period (.3); review Debtor and Liberty communication re motion to withdraw response deadline (.1); review Debtor's fourth motion to extend automatic stay period (.3); draft memo re same (.2); communicate w/ JAL and NRM re same (.2); communicate w/ JDS re Liberty adversary proceeding (.2); communicate w/ NRM re same and motion to extend automatic stay period (.2); communicate w/ NRM re responses to insurer discovery requests (.5); draft response to Chubb discovery requests (1.3); review Debtor responses to Chubb discovery requests (.4); communicate w/ NRM re Travelers' insurers' discovery requests (.2).	3.9	\$550.00	\$2,145.00
6/6/2025	JAL	Correspondence w/ TEP re Liberty adversary proceeding (.1); review and analyze materials re potential motion in Liberty adversary proceeding (.4); correspondence w/ D. Cox re draft discovery responses (.1).	0.6	\$1,520.00	\$912.00
6/6/2025	NRM	Communicate w/ MEB re confirmation discovery (.3); communications w/ TEP and JAL re Liberty Mutual adversary proceeding (.2); communications w/ JAL and TEP re Liberty responses and objections (.2); research re same (.4).	1.1	\$810.00	\$891.00
6/7/2025	JAL	Revise and edit written discovery responses.	2.3	\$1,520.00	\$3,496.00
6/7/2025	TEP	Review JAL and NRM communications re insurer discovery.	0.1	\$1,455.00	\$145.50
6/7/2025	NRM	Communicate w/ MEB re insurer confirmation discovery requests (.6); revise responses and objections to confirmation discovery re Liberty (1.2); research re same (.6); communications w/ TEP and JAL re same (.1); communications w/ CG, JAL, TEP, and MEB re same (.1); communications w/ D. Cox and J. Raskin re same (.1); review and revise responses and objections re Chubb discovery (.6).	3.3	\$810.00	\$2,673.00
6/8/2025	KCM	Teleconference w/ TEP re discovery responses.	0.1	\$1,970.00	\$197.00
6/8/2025	TEP	Communications w/ JAL and NRM re insurer discovery responses (.2); confer w/ KCM re same (.1).	0.3	\$1,455.00	\$436.50
6/8/2025	NRM	Review proposed edits re Liberty objections and responses (.4); communications w/ JAL and TEP re same (.2); review communications from JAL and TEP re same (.1); review and revise responses and objections re Chubb (1.9); research re same (1.2).	3.8	\$810.00	\$3,078.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/9/2025	TEP	Communicate w/ NRM re insurer discovery and responses.	0.1	\$1,455.00	\$145.50
6/9/2025	MEB	Draft counter designations for Chubb Insurers' appeal of appointment of FCR (.7); communicate w/ NRM re same (.2); review Liberty response draft (.2); review Chubb response draft (.2); communicate w/ NRM re same (.1); draft Travelers request response (.1).	1.5	\$550.00	\$825.00
6/10/2025	JAL	Review and analyze discovery responses (.7); communicate w/ NRM re developments and next steps (.1); teleconference w/ NRM re discovery request responses (.4); correspondence w/ TEP and NRM re same (.1); revise and edit objections and responses re Chubb discovery requests (1.4); correspondence w/ D. Cox re deposition prep (.3).	3.0	\$1,520.00	\$4,560.00
6/10/2025	TEP	Communications w/ NRM and JAL re insurer discovery issues (.3); review same (.1); confer w/ NRM re discovery issues and upcoming deadlines (.1).	0.5	\$1,455.00	\$727.50
6/10/2025	NRM	Correspond w/ J. Raskin, D. Cox, JAL, and TEP re Liberty discovery responses and objections (.3); correspond w/ TEP, JAL, and MEB re same (.1); correspond w/ CG and MEB re same (.1); review correspondence from TEP re same (.1); confer w/ MEB re Chubb and Travelers discovery request responses (.3); confer w/ JAL re same (.4); confer w/ D. Cox re same (.1); communicate w/ JDS re research re Liberty Mutual adversary proceeding (.2); confer w/ TEP re discovery issues (.1); revise responses and objections re Chubb (1.3); revise responses and objections re Travelers (1.6); correspond w/ JAL, TEP, and MEB re same (.1).	4.7	\$810.00	\$3,807.00
6/10/2025	MEB	Communicate w/ NRM re FCR appeal counter-designations (.1); research re same (.6); communicate w/ NRM re same (.2); review correspondence between TEP, JAL, NRM and J. Raskin re Liberty discovery objections (.2); confer w/ NRM re Chubb and Travelers discovery request responses (.3); communicate w/ NRM re J. Raskin communication re interrogatories (.2); draft Travelers discovery responses (1.3); communicate w/ NRM re same (.1).	3.0	\$550.00	\$1,650.00
6/11/2025	TEP	Communications w/ JAL and NRM re insurer discovery responses (.4); review materials re same (.2).	0.6	\$1,455.00	\$873.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/11/2025	NRM	Communicate w/ TEP re confirmation discovery (.3); communications w/ TEP, JAL, and KCM re same (.1); communications w/ TEP, JAL, and MEB re same (.1); communications w/ MEB re same (.1); confer w/ D. Cox, T. Brown, T. Long, C. Tully (partial), S. Andelman (partial), and D. Salzman (partial) re expert issues (1.6); research re same (.3); confer w/ C. Tully re insurer discovery responses (.1); communicate w/ CG re same (.2); communications w/ KCZ re same (.2); communications w/ D. Cox re same (.1); communications w/ T. Branham, TEP, and JAL re Liberty Mutual responses (.1); communications w/ JAL and TEP re same (.1); revise same (.8); communications w/ JAL, TEP, and CG re same (.4); communications w/ C. Tully and S. Andelman re same (.1); communications w/ T. Brown, T. Long, D. Salzman, JAL, TEP, D. Cox, and J. Raskin re same (.1); communications w/ CG re discovery issue (.1); communications w/ T. Brown and T. Long re FCR interrogatories (.1); review stipulation in Liberty Mutual adversary proceeding (.1); communications w/ JAL re same (.1); communications w/ MEB re same (.1); revise responses and objections re Chubb and Travelers (.7); research re same (.5); communications w/ JAL re same (.1); communications w/ J. Raskin, D. Cox, and JAL re same (.1); review research memo re Liberty Mutual adversary proceeding (.3).	6.9	\$810.00	\$5,589.00
6/11/2025	MEB	Review filed counter-designations (.2); draft counter-designation filing (.5); communicate w/ RLD re same (.2); communicate w/ NRM re same (.1); communicate w/ JAL and NRM re Liberty's stipulation to extend deadline for objecting to motion to withdraw the reference (.1); communicate w/ JAL and NRM re Travelers discovery responses (.1).	1.2	\$550.00	\$660.00
6/12/2025	JAL	Revise and edit objections and responses to written discovery (1.1); correspondence w/ NRM and TEP re confirmation deposition and hearing prep (.6); correspondence w/ NRM re discovery responses and next steps (.2); review and analyze draft cross-designation of the record (.4).	2.3	\$1,520.00	\$3,496.00
6/12/2025	JPW	Communicate w/ NRM re expert issue.	0.3	\$1,520.00	\$456.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/12/2025	NRM	Confer w/ C. Tully re expert issue (.1); communications w/ TEP and JAL re same (.2); research re same (.3); revise responses and objections re Travelers interrogatories and requests for production (.4); communications w/ JAL and TEP re same (.2); communications w/ D. Cox, JAL, J. Raskin, and TEP re same (.1); communications w/ TEP, JAL, and MEB re same (.1); draft and revise counter-designations for appeal of FCR order (.3); research re same (.4); communications w/ JAL, TEP, and MEB re same (.1).	2.2	\$810.00	\$1,782.00
6/12/2025	MEB	Communicate w/ NRM re counter-designations to Chubb appeal of FCR appointment (.1); communicate w/ NRM and CG re same (.2); communicate w/ JAL and NRM re same (.1); communicate w/ JAL and NRM re Travelers discovery request responses (.1).	0.5	\$550.00	\$275.00
6/13/2025	JAL	Revise and edit motion to dismiss Liberty complaint (1.9); communicate w/ NRM re draft cross-designation of the record re FCR appointment appeal (.1); review and edit drafts of discovery responses (1.4); communications w/ Chubb and Travelers counsel re discovery responses (.4); teleconferences w/ NRM re draft discovery responses (.2).	4.0	\$1,520.00	\$6,080.00
6/13/2025	NRM	Communications w/ JAL re Liberty Mutual motion to dismiss (.1); revise counter-designations for FCR appeal (.2); research re same (.2); communications w/ JAL, TEP, and MEB re same (.1); confer w/ MEB re same (.1); communications w/ CG re same (.4); communications w/ D. Cox, J. Raskin, JAL, and TEP re same (.1); communications w/ CG re Chubb responses and objections (.2); revise responses and objections re Chubb (1.2); communications w/ JAL re same (.1); revise responses and objections re Travelers (1.2); communications w/ JAL and CG re same (.1); communications w/ JAL re same (.1); communications w/ MEB re same (.1); communications w/ T. Brown, T. Long, D. Salzman, K. Harrison, JAL, TEP, D. Cox, and J. Raskin re responses and objections re Chubb and Travelers (.1); confer w/ JAL re same (multiple) (.2); communications w/ KNF re hearing prep (.3); research re same (.4).	5.2	\$810.00	\$4,212.00
6/13/2025	MEB	Communicate w/ JAL and NRM re FCR appeal counter-designations (.1); confer w/ NRM re same (.1).	0.2	\$550.00	\$110.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/14/2025	NRM	Communications w/ JAL re motion to dismiss Liberty Mutual adversary complaint (.1); communications w/ MEB re same (.1); communications w/ OHR re same (.1); research re same (.2); communications w/ JAL re hearing prep (.1); communications w/ RLD re same (.2).	0.8	\$810.00	\$648.00
6/15/2025	NRM	Research re dismissal standard in motion to dismiss Liberty Mutual complaint (1.3); draft section of brief re same (.3); research re judicial notice issues (1.4); draft section of brief re same (.4); communications w/ JAL re same (.1).	3.5	\$810.00	\$2,835.00
6/16/2025	NRM	Communications w/ JAL and TEP re litigation strategy (.2); confer w/ T. Long re case status and strategy (.1); confer w/ D. Salzman re same (.1); communicate w/ JAL re same (.3); communications w/ JAL re research re motion to dismiss Liberty Mutual adversary proceeding (.1); communicate w/ OHR re same (.3); review research memorandum re same (.2); communications w/ JAL and TEP re same (.2); communications w/ CG re same (.1); revise same (.9); research re same (1.4); communications w/ D. Cox and J. Raskin re case status and strategy (.2); research re same (.1).	4.2	\$810.00	\$3,402.00
6/17/2025	JAL	Revise and edit motion to dismiss (.7); confer w/ NRM re developments and next steps (.2); review and analyze materials re hearing prep (1.9); communications w/ K. Finnerty, J. Raskin, and D. Cox re amended Liberty complaint (.2); review and analyze Chubb motion to extend time and related papers (1.7); communications w/ NRM re Liberty complaint (.2).	4.9	\$1,520.00	\$7,448.00
6/17/2025	NRM	Communicate w/ RLD re hearing prep (.4); communications w/ D. Salzman re expert reports (.1); research re same (.2); revise motion to dismiss Liberty Mutual adversary proceeding (.7); research re same (.4); communications w/ JAL re same (.1); review correspondence from D. Cox re same (.1); review Chubb motion to adjourn confirmation hearing and motion to expedite (.5); communications w/ MEB re same (.2); communications w/ JAL re same (.3); communications w/ D. Cox, J. Raskin, TEP, ACM, and JAL re same (.2); research re same (.2); confer w/ JAL re case status and next steps (.2); communicate w/ JAL re same (.4).	4.0	\$810.00	\$3,240.00
6/18/2025	ACM	Teleconference w/ TEP re hearing.	0.1	\$1,200.00	\$120.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/18/2025	JAL	Review and analyze materials re hearing prep (1.1); confer w/ NRM re same (.8); attend hearing (1.5); teleconference w/ TEP and NRM re developments and next steps (.5); review and analyze filings re Liberty adversary proceeding (.1).	4.0	\$1,520.00	\$6,080.00
6/18/2025	TEP	Communications w/ JAL and NRM re motion to adjourn (.1); attend hearing (partial) (.3); confer w/ ACM re same (.1); confer w/ JAL and NRM re hearing and next steps (.5); communications w/ JAL re meet and confer and review communications re same (.2).	1.2	\$1,455.00	\$1,746.00
6/18/2025	NRM	Attend hearing (1.5); communications w/ TEP, D. Cox, and JAL re same (.2); confer w/ JAL and TEP re same (.5); confer w/ JAL re hearing, strategy, and next steps (.8); communications w/ JAL re Liberty Mutual adversary proceeding (.1); correspond w/ JAL, KCM, and TEP re objection to Liberty Mutual 3018 motion (.1); communications w/ MEB re same (.1); communications w/ D. Cox, J. Raskin, JAL, and TEP re meet and confer w/ Chubb (.1); review documents re discovery responses (.7); communications w/ CG re same (.1); communications w/ CG re case status (.2); research re same (.4); communications w/ D. Cox and J. Raskin re next steps (.1); communications w/ C. Tully, W. Scheff, and S. Andelman re written discovery (.1); revise motion to dismiss (.7); communications w/ JAL and CG re same (.1).	5.8	\$810.00	\$4,698.00
6/19/2025	JAL	Prepare re meet and confer w/ Chubb and Travelers (2.7); confer w/ J. Raskin and D. Cox re confirmation-related discovery and prep for meet and confer with Chubb (1.2); attend meet and confer w/ Chubb's and Travelers' counsel, and D. Cox (.3); communicate w/ TEP and NRM re developments and next steps (.2); review Liberty deposition notice (.1); correspondence w/ TEP and NRM re same (.4); revise and edit motion to dismiss (1.3); communicate w/ NRM re developments and next steps (.1).	6.3	\$1,520.00	\$9,576.00
6/19/2025	MEB	Communicate w/ NRM re hearings and Chubb and Liberty motions (.1); review Liberty 30(b)(6) deposition notice (.2); communicate w/ NRM re same (.2); draft motion re same (1.3).	1.8	\$550.00	\$990.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/20/2025	JAL	Review and analyze materials re Chubb's motion to extend (.2); review and analyze issues re hearing prep (.4); communicate w/ TEP and NRM re next steps (.5); conference call w/ TEP re status of pending matters and planning next steps (.1); conference call w/ C. Tully, S. Andelman, W. Scheff, D. Cox, TEP, and NRM re expert issues (.7); communicate w/ NRM re discovery matters and next steps (.2); communicate w/ NRM re discovery and briefing (.2); communication w/ NRM re Liberty depo notice (.1); communication w/ TEP re same (.1); review and analyze materials re issues relating to Liberty depo notice (1.2); attend meet and confer with Liberty's counsel, K. Finnerty, and NRM re Liberty discovery issues (.2); teleconferences w/ NRM re next steps (.2).	4.1	\$1,520.00	\$6,232.00
6/20/2025	TEP	Confer w/ JAL re pending matters and next steps (.1); attend call w/ C. Tully, S. Andelman, W. Scheff, D. Cox, JAL, and NRM re expert issues (.7); communications w/ JAL and NRM re meet and confer (.2); confer w/ NRM re strategy issues (.1).	1.1	\$1,455.00	\$1,600.50
6/20/2025	NRM	Confer w/ TEP re strategy issues (.1); communicate w/ MEB re objection to motion for adjournment (.2); communications w/ T. Long, T. Brown, and JAL re discovery issue (.1); confer w/ C. Tully, S. Andelman, W. Scheff, JAL, TEP, and D. Cox re expert issues (.7); confer w/ JAL, T. Brown, T. Long, J. Raskin, D. Cox, K. Brinkman, and R. Van Epps (partial) re expert issues (.7); communicate w/ TEP re Liberty Mutual meet and confer (.1); communications w/ CG, JAG, and RLD re same (.2); communications w/ S. Andelman and W. Scheff re same (.3); confer w/ W. Scheff re same (.1); communications w/ RLD re same (.1); meet and confer w/ Liberty, K. Finnerty and JAL re discovery issue (.2); confer w/ JAL re same (multiple) (.2); communications w/ OHR re same (.4); communications w/ MEB re same (.2); communications w/ JAL re Liberty Mutual meet and confer (.1); research re same (.9); review Debtor's 30(b)(6) deposition notice (.1); communications w/ JAL, MEB, and TEP re same (.1); confer w/ T. Long re Rule 3018 objection (.1); communications w/ T. Long re same (.1); communications w/ CG and JAL re hearing prep (.1); research re same (.6); communicate w/ MEB re discovery issue and objection to adjourn confirmation (.6).	6.3	\$810.00	\$5,103.00
6/21/2025	JAL	Conferences w/ NRM re discovery matters and next steps (.6); review and edit draft motion to quash (1.4).	2.0	\$1,520.00	\$3,040.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/21/2025	TEP	Communicate w/ JAL and NRM re MTD.	0.1	\$1,455.00	\$145.50
6/21/2025	NRM	Communications w/ TEP and JAL re Liberty Mutual adversary proceeding motion to dismiss (.1); communications w/ CG re same (.1); confer w/ JAL re discovery issues and next steps (multiple) (.6); communications w/ JAL re confirmation discovery (.1); communications w/ JAL, MEB, and CG re same (.1); draft and revise motion to expedite (.7); research re same (.9); communications w/ JAL, MEB, and CG re same (.1); communications w/ CG re confirmation discovery (.2).	2.9	\$810.00	\$2,349.00
6/22/2025	JAL	Communications w/ D. Cox re discovery responses (.3); revise and edit motion to quash (2.2); revise and edit motion for expedited hearing and related documents (1.1); communications w/ NRM, TEP, D. Cox, J. Raskin, and FTI team re discovery issues (.1).	3.7	\$1,520.00	\$5,624.00
6/22/2025	JPW	Communicate w/ NRM re discovery issues (.4); review and analyze discovery responses (1.2).	1.6	\$1,520.00	\$2,432.00
6/22/2025	TEP	Review draft motions to dismiss in the adversary proceeding and communicate w/ JAL, NRM, and CG re same (.3); review and edit draft joinder to motion to adjourn (.5); communications w/ JAL, NRM, and MEB re same (.3); communicate w/ NRM re filings (.1); review draft motion to quash and motion to expedite (.3); communications w/ NRM re same (.2); review D. Cox communications re case filings and discovery (.2); review revised joinder (.1); communications w/ NRM re joinder (.3).	2.3	\$1,455.00	\$3,346.50
6/23/2025	ACM	Review motion to quash Liberty's deposition notice.	0.3	\$1,200.00	\$360.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/23/2025	JAL	Correspondence w/ TEP and NRM re discovery matters (.6); review and edit objection to Chubb motion to extend (1.2); conference call w/ D. Cox, J. Raskin, NRM, S. Andelman, and W. Scheff re discovery matters (.4); teleconference w/ D. Salzman re Chubb motion to extend and related issues (.1); communications w/ L. Davis re deposition issue (.1); correspondence w/ D. Cox, C. Tully, and T. Brown re discovery matters (.2); communications w/ P. Santelle re discovery issues (.4); correspondence to D. Cox, J. Raskin, KCM, TEP, and NRM re same (.2); teleconference w/ NRM re motion to quash (.2); communicate w/ NRM and MEB re objection to Chubb motion to extend and next steps (.2); teleconference w/ NRM re joinder (.1); revise and edit joinder and objection to motions to extend (.8); review and analyze materials re discovery matters (.4); confer w/ NRM re hearing prep (.6); correspondence w/ NRM re same (.2); review and analyze materials re same (.3).	6.0	\$1,520.00	\$9,120.00
6/23/2025	TEP	Communications w/ JAL and NRM re motion and filings (.1); conferences w/ NRM re discovery responses and filings (.2); review communications re next steps (.1).	0.4	\$1,455.00	\$582.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/23/2025	NRM	Confer w/ D. Cox, J. Raskin, S. Andelman, W. Scheff, and JAL re deposition prep and discovery (.4); confer w/ D. Salzman re expert issues (.1); confer w/ JAL re hearing prep (.6); communications w/ JAL re motion to quash and motion to adjourn (.3); confer w/ JAL re motion to quash (.2); communicate w/ CG re same (.1); communicate w/ MEB re same (.5); communications w/ JAL re document production (.2); confer w/ T. Long re motion to adjourn and hearing prep (multiple) (.2); communications w/ JAL, TEP, and MEB re same (.1); communications w/ CG re deposition notice (.2); review and revise motion to quash, motion to expedite, and notice of hearing (1.9); communications w/ CG re same (.2); research re joinder to objection to adjourn (1.4); confer w/ JAL re same (.1); communicate w/ TEP re same (.1); communications w/ MEB re same (.3); communications w/ JAL, MEB, and CG re same (.2); communications w/ D. Cox, TEP, J. Raskin, and JAL re same (.1); communications w/ W. Scheff, D. Cox, S. Andelman, JAL, TEP, and J. Raskin re discovery responses (.1); revise same (.3); conferences w/ TEP re same (.2); communications w/ D. Cox, JAL, TEP, and J. Raskin re document production (.2); communications w/ TEP re same (.1); communications w/ CG re same (.4); review documents re same (.8); communications w/ MEB re Liberty Mutual motion to dismiss (.2); draft memorandum re case status and next steps (.4); research re same (.4).	10.3	\$810.00	\$8,343.00
6/23/2025	MEB	Communicate w/ NRM re Liberty adversary proceeding motion to dismiss (.1); review correspondence w/ Morgan Lewis re same (.1); review amended complaint (.2); research re caselaw re same (.7); draft motion to dismiss re same (.4).	1.5	\$550.00	\$825.00
6/24/2025	JAL	Teleconference w/ TEP and NRM re developments and next steps (.2); confer w/ NRM re discovery issues (.5); conference call w/ D. Cox and NRM re same (.6); confer w/ JPW and NRM re same (.2); review and analyze materials re hearing prep (1.7); correspondence w/ KCM, TEP, NRM, J. Raskin, and D. Cox re discovery (.4); review and analyze materials re confirmation discovery issues (.7); communications w/ JPW re discovery issues (.2); confer w/ NRM re hearing prep (multiple) (.9); attend hearing (1.1); confer w/ T. Brown, T. Long, and NRM re developments and next steps (.1); communications w/ D. Cox re discovery issues (.3).	6.9	\$1,520.00	\$10,488.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/24/2025	JPW	Teleconference w/ JAL and NRM re discovery issues.	0.2	\$1,520.00	\$304.00
6/24/2025	TEP	Communications w/ NRM re hearing status (.1); conference w/ JAL and NRM re case status and next steps (.2); communications w/ KCM, JAL, and NRM re deposition issues (.2); review insurer, JAL and D. Cox communications re same (.3).	0.8	\$1,455.00	\$1,164.00
6/24/2025	NRM	Confer w/ JAL and D. Cox re discovery issue (.6); confer w/ JAL and JPW re same (.2); communications w/ Cox, J. Raskin, and JAL re same (.1); confer w/ JAL re discovery issues (.5); confer w/ JAL re hearing prep (multiple) (.9); communications w/ J. Taylor, C. Cockerham, JAL, and D. Cox re protective order acknowledgment (.1); review same (.1); communications w/ C. Tully, JAL, TEP, D. Cox, J. Raskin, W. Scheff, and S. Andelman re document production (.2); communications w/ D. Cox re same (.1); review document production (.4); communicate w/ CG re same (.4); communications w/ JAL and CG re same (.1); revise joinder to Rule 3018 objection (.2); communications w/ CG, JAL, and MEB re same (.1); communications w/ CG re service of motion to quash and motion to expedite (.1); review communications from P. Santelle re Debtor's 30(b)(6) deposition (.1); communications w/ D. Cox re Committee 30(b)(6) deposition prep (.1); attend hearing (1.1); prepare re same (.9); confer w/ JAL, T. Long, and T. Brown re same (.1); research re reply in support of adjournment (2.2); confer w/ JAL and TEP re case status and next steps (.2); communications w/ TEP re same (.1).	8.9	\$810.00	\$7,209.00
6/24/2025	MEB	Communications w/ NRM re hearing prep (.1); draft joinder to Debtor's objection re Liberty's Rule 3018 motion (.2); communicate w/ JAL, NRM, and CG re same (.1); review Liberty 30(b)(6) deposition notice (.1).	0.5	\$550.00	\$275.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/25/2025	JAL	Teleconferences w/ NRM re discovery issues (.2); correspondence w/ TEP, KCM, and NRM re same (.3); correspondence w/ D. Cox, J. Raskin, and B. Edwards re same (.3); teleconference w/ TEP re same (.1); communications w/ K. Finnerty re deposition scheduling (.2); communications w/ NRM, CG, and TEP re developments and next steps (.3); communications w/ P. Santelle and K. Finnerty re discovery issue (.1); correspondence w/ NRM re same (.2); correspondence w/ NRM, CG, and TEP re next steps re discovery (.2); conference call w/ NRM, JPW, and D. Cox (partial) re discovery issue (.3); confer w/ D. Cox, NRM, C. Tully (partial), S. Andelman (partial), and W. Schiff (partial) re discovery issues (2.1); review and edit discovery response (.3).	4.6	\$1,520.00	\$6,992.00
6/25/2025	JPW	Review discovery response (.3); teleconference NRM re discovery issues (.2); teleconference JAL, NRM, D. Cox (partial) re discovery issues (.3).	0.8	\$1,520.00	\$1,216.00
6/25/2025	TEP	Communications w/ KCM, JAL, and NRM re deposition planning and discovery (.2); confer w/ JAL re same (.1); review K. Finnerty, JAL, and D. Cox communication re deposition issue and plan/prepare re same (.3).	0.6	\$1,455.00	\$873.00
6/25/2025	NRM	Communications w/ CG re Liberty Mutual notice of hearing (.1); communications w/ JAL re document productions (.1); confer w/ JAL re same (.2); communications w/ JAL, TEP, and CG re same (.4); communications w/ JAL and TEP re same (.1); prepare document production (2.2); communicate w/ CG re same (.5); communications w/ W. Scheff and S. Andelman re same (.1); confer w/ JAL, D. Cox, W. Scheff (partial), C. Tully (partial) and S. Andelman (partial) re expert issues (2.1); confer w/ D. Cox (partial), JAL, and JPW re discovery issues (.3); confer w/ JPW re same (.2); communications w/ CG re discovery issue (.1).	6.4	\$810.00	\$5,184.00
6/25/2025	MEB	Communicate w/ JAL, NRM, and Liberty re deposition schedule.	0.1	\$550.00	\$55.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/26/2025	JAL	Correspondence w/ NRM re discovery issues and next steps (.2); correspondence w/ D. Cox and TEP re Rule 30(b)(6) deposition (.2); communicate w/ NRM and TEP re Liberty appeal and next steps (.4); correspondence w/ D. Cox re Rule 30(b)(6) deposition (.2); review and analyze materials re discovery matters and next steps (.7); confer w/ T. Brown, T. Long, D. Cox, J. Raskin (partial), NRM, C. Tully, S. Andelman, and W. Scheff re expert issues (2.5); correspondence w/ TEP re depo prep and scheduling (.1); communications w/ K. Finnerty re Rule 30(b)(6) deposition (.1); correspondence w/ NRM re motion to dismiss and next steps (.4); correspondence w/ NRM re discovery issue (.1); teleconference w/ NRM re motion to dismiss and next steps (.3).	5.2	\$1,520.00	\$7,904.00
6/26/2025	TEP	Communications w/ JAL re 30b6 deposition (.1); review NRM communications re discovery (.1).	0.2	\$1,455.00	\$291.00
6/26/2025	NRM	Confer w/ JAL, T. Brown, T. Long, S. Andelman, C. Tully, W. Scheff, D. Cox, J. Raskin (partial) re expert issues (2.5); prepare re same (.6); communications w/ D. Salzman re same (.1); confer w/ D. Salzman re same (.1); communications w/ D. Cox, JAL, and J. Raskin re same (.1); confer w/ D. Cox re discovery issue (.5); research re same (.6); communications w/ JAL and TEP re same (.1); communications w/ T. Branham, TEP, JAL, D. Cox, and J. Raskin re same (.2); communications w/ W. Scheff and S. Andelman re same (.3); communications w/ KNF re same (.1); research re objection to deposition notice (.6); communications w/ JAL re same (.2); communications w/ JAL and TEP re 30(b)(6) deposition prep (.1); communications w/ TEP and CG re appeal deadlines in Liberty Mutual appeal (.1); communications w/ JAL and TEP re same (.1); review motion to dismiss Liberty Mutual appeal from Roussel claimants (.4); correspond w/ JAL re same (.2); correspond w/ CG re same (.1); confer w/ JAL re revisions to Liberty Mutual motion to dismiss (.3); research re same (.9); communications w/ JAL re same (.1).	8.3	\$810.00	\$6,723.00
6/26/2025	MEB	Communicate w/ NRM re research re discovery issue (.4); research re caselaw re same (.5).	0.9	\$550.00	\$495.00
6/27/2025	JAL	Review and analyze Roussel claimants' motion to dismiss (.4); confer w/ NRM re developments (.1); communicate w/ NRM re updates re developments and discovery-related matters (.3).	0.8	\$1,520.00	\$1,216.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/27/2025	TEP	Communications w/ JAL and NRM re C. Tully deposition (.2); conferences w/ NRM re deposition issues, related prep, and next steps (.3); communications w/ KCM, JAL, and NRM re discovery issues (.2); review NRM communication re same (.1).	0.8	\$1,455.00	\$1,164.00
6/27/2025	NRM	Attend deposition of C. Tully (5.9); confer w/ D. Cox re same (multiple) (.5); communications w/ TEP and JAL re same (.2); confer w/ JAL re same (.1); confer w/ TEP re same (multiple) (.3); correspond w/ W. Scheff re Tully deposition (.1); correspond w/ D. Salzman re same (.1); correspond w/ T. Long re same (.1); prepare re same (.3); communications w/ TEP and JAL re same (.2); correspond w/ K. Finnerty re 30(b)(6) deposition (.1); communications w/ OHR re objection to Rule 30(b)(6) deposition notice (.2); communications w/ T. Branham, D. Cox, B. Edwards, TEP, and JAL re Rule 30(b)(6) deposition prep (.1); communications w/ AMS re same (.2).	8.4	\$810.00	\$6,804.00
6/27/2025	MEB	Communicate w/ NRM re discovery issue (.1); communication w/ OHR re same (.2).	0.3	\$550.00	\$165.00
6/28/2025	TEP	Communications w/ JAL, NRM, and D. Cox re depo prep (.3); communications w/ NRM re discovery issue (.2).	0.5	\$1,455.00	\$727.50
6/28/2025	NRM	Communications w/ TEP re privilege log (.1); research re same (.1); communications w/ TEP, KCM, and JAL re same (.1); communications w/ D. Cox re same and deposition prep (.1); communications w/ T. Branham, TEP, JAL, D. Cox, and B. Edwards re same (.1); draft sections of motion to dismiss Liberty Mutual amended complaint (1.1); revise Rule 30(b)(6) objection (1.2); research re same (.7); communications w/ JAL re same (.1).	3.6	\$810.00	\$2,916.00
6/29/2025	JAL	Communicates w/ D. Cox re discovery-related matters.	0.3	\$1,520.00	\$456.00
6/29/2025	TEP	Communications w/ NRM re depo prep (.2); review D. Cox communication re case strategy issues (.1).	0.3	\$1,455.00	\$436.50
6/30/2025	JAL	Attend deposition prep session (1.9); review and analyze objection to Liberty deposition notice (.6); review and analyze discovery-related document (.7); review and analyze materials re depo prep (1.2).	4.4	\$1,520.00	\$6,688.00
6/30/2025	TEP	Communications w/ JAL and NRM re deposition prep (.4); review materials re same (.3); attend deposition prep session (1.9); review NRM and JAL communications re discovery next steps (.1).	2.7	\$1,455.00	\$3,928.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
6/30/2025	NRM	Attend deposition prep session (1.9); review communications from TEP and JAL re same (.1); correspond w/ D. Salzman re depositions (.2); communications w/ T. Long re depositions (.1); research re discovery issue (.6); communicate w/ CG re document production (.4); communications w/ TEP, JAL, and CG re same (.3); communications w/ D. Cox, JAL, and TEP re same (.1); prepare privilege log (.8); research re same (1.4); communications w/ JAL, TEP, and MEB re same (.2); communications w/ JAL re objection to Rule 30(b)(6) deposition notice (.1); confer w/ MEB re same (.1); communications w/ MEB re same (.1); revise motion to dismiss Liberty Mutual amended complaint (3.1); communications w/ MEB re same (.1).	9.6	\$810.00	\$7,776.00
6/30/2025	MEB	Confer w/ NRM re deposition objection (.1); communicate w/ NRM re same (.2) review motion to quash (.2); draft discovery objection (1.3); review Roussell MTD to Liberty adversary complaint (.2); revise motion to dismiss (.2); communication w/ NRM re same (.2).	2.4	\$550.00	\$1,320.00
Total			222.30		\$236,907.50
.11 Plan & Disclosure Statement					
6/1/2025	ACM	Communications w/ TEP re 6/2 call re trust matters (.2); review and revise plan supplement (.4); review TDP (.3); review trust agreement (.3).	1.2	\$1,200.00	\$1,440.00
6/1/2025	JPW	Communicate w/ TEP re case status and next steps.	0.2	\$1,520.00	\$304.00
6/1/2025	TEP	Communications w/ JAL re FTI meeting (.2); communications w/ NRM re trust issues and related research (.3); communications w/ ACM re same (.1).	0.6	\$1,455.00	\$873.00
6/2/2025	ACM	Review and revise plan supplement (.4); communications w/ w/ JAL re same (.1); review plan and trust agreement provisions re trust-related issues (.4); communicate w/ TEP re same (.4).	1.3	\$1,200.00	\$1,560.00
6/2/2025	JAL	Confer w/ C. Tully, M. Diaz, W. Scheff, and J. Raskin re reorganization matters (.8); revise and edit draft plan exhibits (1.3); correspondence w/ J. Raskin, D. Cox, TEP, and NRM re plan-related matter (.3); correspondence w/ TEP and ACM re draft plan exhibits (.3).	2.7	\$1,520.00	\$4,104.00
6/2/2025	JPW	Review correspondence re plan issue.	0.3	\$1,520.00	\$456.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
6/3/2025	ACM	Meet w/ TEP (partial) and FCR counsel re trust issues (.5); communications w/ TEP re plan-related issues (.2); review files re same (.3); communications w/ JAL re TDP and trust agreement revisions (.1).	1.1	\$1,200.00	\$1,320.00
6/3/2025	JAL	Review and analyze plan document edits.	0.2	\$1,520.00	\$304.00
6/3/2025	TEP	Communicate w/ B. Edwards re trust issue (.1); communicate w/ Trustee candidate re next steps (.2); confer w/ D. Salzman and ACM re trust issues (partial) (.4).	0.7	\$1,455.00	\$1,018.50
6/3/2025	NRM	Draft memorandum re trust issues (.4); research re same (.5).	0.9	\$810.00	\$729.00
6/4/2025	ACM	Communicate w/ TEP re Trustee matters (.1); teleconference w/ TEP re same (.1); communication w/ TEP and JAL re plan supplement (.1).	0.3	\$1,200.00	\$360.00
6/4/2025	JAL	Review and analyze confirmation-related issues (1.1); communicate w/ NRM re same (.1); communicate w/ NRM re developments and next steps (.2); review and analyze confirmation issues (1.6); confer w/ T. Brown, T. Long, C. Tully (partial), S. Andelman (partial), W. Scheff (partial), NRM, and D. Cox re confirmation-related issues (.9); confer w/ KCM, TEP, and NRM re developments, strategy, and next steps (.8).	4.7	\$1,520.00	\$7,144.00
6/4/2025	KCM	Teleconference w/ TEP, JAL, and NRM re case strategy.	0.8	\$1,970.00	\$1,576.00
6/4/2025	TEP	Communicate w/ prospective Trustee (.1); confer w/ prospective Trustee re case issues (.1); communications w/ KCM, JAL, and NRM re case issues (.2); communications w/ ACM re Trustee issues (.2); confer w/ ACM re same (.1); conferences w/ NRM re plan and case issues (.2); communicate w/ KCM re case status (.1); confer w/ KCM, JAL, and NRM re case strategy issues (.8).	1.8	\$1,455.00	\$2,619.00
6/4/2025	NRM	Correspond w/ JAL, TEP, and KCM re plan issues (.2); review correspondence from JAL re same (.1); confer w/ TEP re same (.2); review correspondence from W. Scheff re same (.1); confer w/ W. Scheff re same (multiple) (.2); confer w/ T. Brown, T. Long, D. Cox, C. Tully (partial) W. Scheff (partial), S. Andelman (partial), and JAL re confirmation-related issues (.9); confer w/ JAL, TEP, and KCM re case strategy (.8).	2.5	\$810.00	\$2,025.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
6/5/2025	ACM	Review and revise TDP (2.3); communications w/ FCR counsel re same (.1); review and revise trust agreement (4.7); teleconference w/ TEP re same (.1); communications w/ JAL re plan supplement (.1).	7.3	\$1,200.00	\$8,760.00
6/5/2025	JAL	Communicate w/ ACM and NRM re plan supplement (.4); communications w/ J. Raskin and D. Cox re same (.2); review and analyze issues re plan supplement (.5); communications w/ D. Cox and J. Raskin re comments on plan exhibit (.4); communications w/ MEB re same (.2); review S. Andelman correspondence and accompanying materials re updated exhibits (.9); review and analyze memo re plan issue (1.0); communicate w/ AKH re same (.3).	3.9	\$1,520.00	\$5,928.00
6/5/2025	TEP	Review JAL, NRM communications re plan supplement materials (.3); review materials re same (.2); confer w/ ACM re trust agreement (.1).	0.6	\$1,455.00	\$873.00
6/5/2025	MEB	Communicate w/ NRM re plan supplement.	0.5	\$550.00	\$275.00
6/6/2025	ACM	Teleconferences w/ NRM re plan supplement (.2); revise trust agreement (.3); communicate w/ NRM and JAL re same (.1); communicate w/ TEP re trust-related issues (.3); communicate w/ Debtor's counsel re plan supplement documents (.1); communicate w/ FCR counsel re plan supplement (.1); revise plan supplement (.6).	1.7	\$1,200.00	\$2,040.00
6/6/2025	JAL	Correspondence w/ ACM, NRM, KCM, and TEP re status and next steps (.1); correspondence w/ TEP re trust agreement issues (.1); communications w/ T. Long re plan supplement notice (.3); correspondence w/ NRM, TEP, and ACM re plan supplement changes (.1); review and analyze revised plan supplement documents (.5); correspondence w/ D. Cox re insurance issue (.1); correspondence w/ NRM re next steps on plan supplement documents (.2); correspondence w/ ACM and NRM re trust agreement and TDP issues (.2); review and analyze trust agreement (.3); correspondence w/ NRM re next steps on plan supplement (.1).	2.0	\$1,520.00	\$3,040.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
6/6/2025	NRM	Draft and revise notice of plan supplement and exhibits (1.7); confer w/ ACM re same (multiple) (.2); communicate w/ TEP re same (.5); confer w/ S. Andelman re same (.1); communicate w/ JAL re same (.2); confer w/ T. Long re same (multiple) (.3); communications w/ D. Cox re same (.1); communications w/ JAL, TEP, and ACM re same (.4); review communications from JAL and ACM re same (.1); communications w/ T. Long, JAL, TEP, ACM, T. Brown, D. Cox, J. Rovira, and J. Raskin re same (.3); communications w/ S. Andelman re same (.2); communications w/ CG re same (.1); communications w/ C. Tully and S. Andelman re same (.1); review Liberty Rule 3018 motion (.2); communications w/ JAL re same (.1).	4.6	\$810.00	\$3,726.00
6/6/2025	MEB	Communicate w/ JAL and NRM re Liberty's motion to allow temporary voting rights (.1); review motion re same (.1); communicate w/ NRM re same (.1); communicate w/ RLD re same (.1).	0.4	\$550.00	\$220.00
6/9/2025	ACM	Teleconference w/ TEP re voting matter.	0.1	\$1,200.00	\$120.00
6/9/2025	TEP	Confer w/ ACM re plan issue (.1); communicate w/ NRM re same (.1).	0.2	\$1,455.00	\$291.00
6/10/2025	NRM	Communicate w/ T. Long re confirmation prep (.1); confer w/ T. Long re same (.2); confer w/ D. Salzman re same (.1); correspond w/ T. Brown re same (.1); correspond w/ D. Salzman re same (.1).	0.6	\$810.00	\$486.00
6/11/2025	NRM	Confer w/ T. Long re voting (multiple) (.3); communicate w/ TEP re same (.1); communicate w/ JAL re same (.1).	0.5	\$810.00	\$405.00
6/12/2025	JAL	Review and analyze plan issues and next steps.	0.3	\$1,520.00	\$456.00
6/12/2025	TEP	Communications w/ JAL and NRM re liquidation analysis and related plan issues.	0.2	\$1,455.00	\$291.00
6/12/2025	NRM	Confer w/ T. Long re plan balloting (.1); communicate w/ JAL re confirmation prep (.1).	0.2	\$810.00	\$162.00
6/13/2025	JAL	Teleconference w/ NRM re case status and strategy (.6); communication w/ NRM re same and next steps (.1).	0.7	\$1,520.00	\$1,064.00
6/13/2025	TEP	Communications w/ JAL and NRM re voting and case status.	0.2	\$1,455.00	\$291.00
6/13/2025	NRM	Confer w/ T. Long re voting (multiple) (.2); communications w/ TEP and JAL re same (.3); confer w/ JAL re case status and strategy (.6).	1.1	\$810.00	\$891.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
6/16/2025	MEB	Communicate w/ NRM re plan proponent's potential confirmation filing (.3); review analogous filings re same (.7); review analogous filings re ballot tabulation declarations (1.1); communicate w/ NRM re same (.4).	2.5	\$550.00	\$1,375.00
6/17/2025	ACM	Review UST correspondence (.2); meet w/ TEP (partial), JAL and NRM (partial) re same and plan-related issues (.4).	0.6	\$1,200.00	\$720.00
6/17/2025	JAL	Confer w/ ACM, TEP (partial), and NRM (partial) re plan confirmation issues.	0.4	\$1,520.00	\$608.00
6/17/2025	TEP	Confer w/ JAL, ACM, and NRM (partial) re confirmation and plan issues (partial) (.3); review D. Cox and JAL communications re amended complaint (.1); review NRM, JAL communications re insurer motion (.1).	0.5	\$1,455.00	\$727.50
6/17/2025	NRM	Confer w/ S. Andelman re confirmation prep (multiple) (.4); confer w/ T. Long re same (multiple) (.2); review correspondence from T. Brown re UST comments on amended plan (.1); confer w/ JAL, ACM, and TEP (partial) re plan issues (partial) (.3); communications w/ JAL, ACM, and TEP re same (.1).	1.1	\$810.00	\$891.00
6/18/2025	ACM	Communications w/ TEP and JAL re UST matter (.1); communications w/ FCR counsel re same (.1); review TDP (.2); communications w/ JAL re claims issue (.1).	0.5	\$1,200.00	\$600.00
6/18/2025	JAL	Confer w/ T. Brown, T. Long, and NRM re confirmation-related matters and next steps (.5); communications w/ NRM, KCM, and TEP re developments and next steps (.3).	0.8	\$1,520.00	\$1,216.00
6/18/2025	TEP	Communications w/ ACM re TDP issues (.2); communications w/ JAL, ACM, and NRM re UST inquiry (.1).	0.3	\$1,455.00	\$436.50
6/18/2025	NRM	Confer w/ T. Brown, T. Long, and JAL re confirmation-related issues (.5); confer w/ T. Long re confirmation prep (.1); research re confirmation briefing (.4); communications w/ T. Long re same (.1).	1.1	\$810.00	\$891.00
6/19/2025	ACM	Communications w/ JAL re TDP-related issues.	0.1	\$1,200.00	\$120.00
6/19/2025	JAL	Communications w/ T. Brown re UST comments.	0.4	\$1,520.00	\$608.00
6/20/2025	JAL	Conference call w/ NRM, T. Brown, R. Van Epps (partial), J. Raskin, D. Cox, T. Long, and K. Brinkman re confirmation prep and insurance matters.	0.7	\$1,520.00	\$1,064.00
6/20/2025	NRM	Confer w/ JAL, T. Brown, T. Long, J. Raskin, D. Cox, K. Brinkman, and R. Van Epps (partial) re confirmation issues.	0.7	\$810.00	\$567.00
6/22/2025	KCM	Communicate w/ TEP re case status and strategy.	0.5	\$1,970.00	\$985.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
6/25/2025	JAL	Correspondence w/ T. Long re confirmation briefing schedule.	0.1	\$1,520.00	\$152.00
6/25/2025	NRM	Communications w/ JAL, TEP, J. Raskin, and D. Cox re confirmation briefing schedule (.1); draft plan supplement (.6); research re same (1.1).	1.8	\$810.00	\$1,458.00
6/26/2025	ACM	Review confirmation schedule updates.	0.1	\$1,200.00	\$120.00
6/26/2025	NRM	Draft plan supplement (.7); communicate w/ MEB re confirmation prep (.1).	0.8	\$810.00	\$648.00
6/30/2025	ACM	Communications w/ TEP re trust agreement (.1); review trust agreement (.2).	0.3	\$1,200.00	\$360.00
6/30/2025	NRM	Confer w/ T. Long re confirmation issues (.1); communicate w/ MEB re plan supplement (.1).	0.2	\$810.00	\$162.00
6/30/2025	MEB	Review analogous plan-related filing (.2); review Hopeman plan (.4); draft plan supplement (.3); communicate w/ TEP, JAL, and NRM re same (.1).	1.0	\$550.00	\$550.00
Total			58.90		\$69,410.50
.15 Committee Meetings/Conferences					
6/1/2025	ACM	Communications with TEP re 6/3 Committee meeting.	0.1	\$1,200.00	\$120.00
6/1/2025	TEP	Communications w/ ACM re Committee meeting (.1); communications w/ Co-Chairs re same (.1); communicate w/ Committee re same (.1); communications w/ J. Raskin, ACM, and Co-Chair re trust issues and meeting (.3).	0.6	\$1,455.00	\$873.00
6/2/2025	ACM	Meet w/ TEP, JAL, J. Raskin and Committee Member re trust issues (.5); communications w/ Committee re Trustee matter (.1).	0.6	\$1,200.00	\$720.00
6/2/2025	JAL	Correspondence w/ TEP and NRM re Committee inquiry (.2); conference call w/ Committee Co-Chair, ACM, TEP, and J. Raskin re trust issues (.5); prepare re Committee meeting (.8).	1.5	\$1,520.00	\$2,280.00
6/2/2025	TEP	Conferences w/ constituents re case status (.2); communications w/ NRM re same (.1); communications w/ Committee Member re adversary proceeding and communications w/ JAL and NRM re same (.2); prepare for Co-Chair call (.3); confer w/ Co-Chair, J. Raskin, ACM, and JAL re trust issues (.5); communications w/ JAL, NRM, and J. Raskin re Committee Member inquiry (.3).	1.6	\$1,455.00	\$2,328.00
6/3/2025	ACM	Attend Committee meeting.	0.8	\$1,200.00	\$960.00
6/3/2025	ACM	Teleconference w/ Committee Members re Trustee issue (.2); conference w/ TEP re same (.1).	0.3	\$1,200.00	\$360.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
6/3/2025	TEP	Conferences w/ Co-Chair re case status and next steps (.3); communications w/ ACM re same (.1); communications w/ NRM re Committee communication (.1); confer w/ ACM re Trustee issue (.1); communications w/ Co-Chair re next steps (.1); attend Committee meeting (.8); communicate w/ NRM and MEB re Co-Chair request (.2); review materials re same (.3).	2.0	\$1,455.00	\$2,910.00
6/4/2025	JAL	Revise and edit Committee communication.	0.8	\$1,520.00	\$1,216.00
6/4/2025	TEP	Confer w/ Co-Chair re case issue (.1); communications w/ Co-Chairs re case status (.1); communications w/ constituents re adversary proceeding (.2); communications w/ JAL, ACM, and NRM re Committee communication (.2); communications w/ ACM, JAL, and NRM re Co-Chair request (.3); review and edit materials re same and communicate w/ Co-Chair (.3).	1.2	\$1,455.00	\$1,746.00
6/5/2025	TEP	Communications w/ constituent re plan issue.	0.1	\$1,455.00	\$145.50
6/6/2025	TEP	Confer w/ Co-Chair re plan supplement materials (.1); communications w/ constituents re adversary proceeding (.4); confer w/ constituent re case status (.2).	0.7	\$1,455.00	\$1,018.50
6/6/2025	NRM	Correspond w/ Committee re plan supplement exhibits.	0.1	\$810.00	\$81.00
6/8/2025	TEP	Communications w/ JAL and NRM re Committee meeting.	0.2	\$1,455.00	\$291.00
6/9/2025	TEP	Communication w/ Co-Chairs re case status and confirmation (.3); confer w/ Co-Chair re plan issue (.1).	0.4	\$1,455.00	\$582.00
6/10/2025	ACM	Teleconference w/ Committee Member re TDP matter.	0.1	\$1,200.00	\$120.00
6/10/2025	TEP	Communications w/ Co-Chair re discovery (.2); communications w/ JAL and NRM re same (.2).	0.4	\$1,455.00	\$582.00
6/10/2025	NRM	Correspond w/ Committee re discovery issues (.1); correspond w/ Committee Co-Chair re same (.1); confer w/ Committee Member representative re voting (.1).	0.3	\$810.00	\$243.00
6/11/2025	TEP	Communications w/ Co-Chair re same (.2); communicate w/ NRM re same and Committee communication (.4); communications w/ JAL and NRM re Committee communication (.3).	0.9	\$1,455.00	\$1,309.50
6/11/2025	NRM	Communications w/ Committee re voting deadline (.2); communications w/ JAL and TEP re same (.3); communications w/ Committee Member re same (.2); research re same (.4); communications w/ Committee re discovery responses (.1).	1.2	\$810.00	\$972.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
6/12/2025	ACM	Teleconference w/ TEP re Co-Chair communication re solicitation issue.	0.1	\$1,200.00	\$120.00
6/12/2025	TEP	Confer w/ Co-Chair re solicitation issue (.1); communicate w/ JAL re same (.1); confer w/ ACM re same (.1).	0.3	\$1,455.00	\$436.50
6/12/2025	NRM	Communications w/ Committee Member representatives re plan issue (.2); confer w/ Committee Member representatives re same (multiple) (.2); communications w/ Committee re same (.1); communications w/ Committee re discovery issues (.1); communications w/ Committee Member representative, TEP, and JAL re same (.1).	0.7	\$810.00	\$567.00
6/13/2025	TEP	Communications w/ Co-Chairs re voting and case status (.2); communicate w/ NRM re Committee communication (.1).	0.3	\$1,455.00	\$436.50
6/13/2025	NRM	Communications w/ Committee re FCR appeal.	0.1	\$810.00	\$81.00
6/15/2025	NRM	Communications w/ TEP and JAL re Committee meeting.	0.1	\$810.00	\$81.00
6/16/2025	TEP	Communications w/ JAL and NRM re Committee meeting and next steps (.2); communications w/ Co-Chairs re same (.1); communicate w/ Committee re same (.1); review Committee Member inquiry and communicate w/ JAL and NRM re same (.1).	0.5	\$1,455.00	\$727.50
6/17/2025	TEP	Communications w/ ACM, JAL, and NRM re Committee update communication.	0.2	\$1,455.00	\$291.00
6/17/2025	NRM	Draft Committee communication re case status (.4); communications w/ JAL, TEP, and ACM re same (.1); correspond w/ Committee re same (.1).	0.6	\$810.00	\$486.00
6/18/2025	ACM	Communicate w/ Committee re TDP issue.	0.7	\$1,200.00	\$840.00
6/18/2025	JAL	Communications w/ NRM re Committee communication.	0.2	\$1,520.00	\$304.00
6/18/2025	TEP	Communications w/ JAL and NRM re Committee update.	0.1	\$1,455.00	\$145.50
6/18/2025	NRM	Draft correspondence to Committee re hearing (.4); communications w/ TEP and JAL re same (.1); communications w/ Committee re same (.1).	0.6	\$810.00	\$486.00
6/19/2025	TEP	Communications w/ constituent re status call (.1); prepare for call re same (.1); confer w/ constituent re case status (.2); communications w/ Co-Chairs re confirmation discovery (.2); communications w/ JAL and NRM re same (.2).	0.8	\$1,455.00	\$1,164.00
6/20/2025	TEP	Review Committee Member inquiry re adversary proceeding and communications w/ KCM, JAL, and NRM re same (.2); communications w/ Committee Members re same (.2).	0.4	\$1,455.00	\$582.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
6/22/2025	TEP	Communications w/ NRM re Committee communications and next steps.	0.2	\$1,455.00	\$291.00
6/22/2025	NRM	Draft Committee communication (.2); communications w/ TEP re same (.1).	0.3	\$810.00	\$243.00
6/23/2025	TEP	Communications w/ JAL and NRM re Committee meeting.	0.2	\$1,455.00	\$291.00
6/24/2025	ACM	Attend Committee meeting (.3); review draft agenda and minutes (.2); communicate w/ NRM and TEP re same (.1).	0.6	\$1,200.00	\$720.00
6/24/2025	JAL	Attend Committee meeting.	0.3	\$1,520.00	\$456.00
6/24/2025	TEP	Communications w/ NRM re Committee meeting (.2); review and edit minutes/agenda and communications w/ ACM, JAL, and NRM re same (.2); communicate w/ NRM re same (.1); communications w/ Co-Chairs re hearing status (.2); confer w/ constituent re adversary proceeding (.1); prepare for Committee meeting (.2); attend Committee meeting (.3); communicate w/ JAL and NRM re same (.1).	1.4	\$1,455.00	\$2,037.00
6/24/2025	NRM	Attend Committee meeting (.3); draft agenda and minutes re same (.5); communications w/ TEP, JAL, and ACM re same (.1); communications w/ TEP re same (.2).	1.1	\$810.00	\$891.00
6/25/2025	TEP	Communications w/ Co-Chairs re deposition planning (.2); communications w/ KCM, JAL, and NRM re Committee update (.2).	0.4	\$1,455.00	\$582.00
6/25/2025	NRM	Draft memorandum for Committee re case status (.3); communications w/ TEP, JAL, and KCM re same (.1).	0.4	\$810.00	\$324.00
6/26/2025	JAL	Communicate w/ NRM, TEP, and KCM re Committee communication (.5); communications w/ NRM re same (.1); correspondence w/ NRM and TEP re same (.5).	1.1	\$1,520.00	\$1,672.00
6/26/2025	TEP	Review and edit draft Committee communication and communications w/ JAL and NRM re same (.3); communications w/ Co-Chair re discovery (.1).	0.4	\$1,455.00	\$582.00
6/30/2025	JAL	Review and analyze Committee communication.	0.6	\$1,520.00	\$912.00
6/30/2025	TEP	Communications w/ JAL and NRM re Committee meeting agenda/minutes.	0.1	\$1,455.00	\$145.50
6/30/2025	NRM	Draft agenda and minutes re Committee meeting (.4); communications w/ TEP and JAL re same (.1); communications w/ Committee re same (.1).	0.6	\$810.00	\$486.00
Total			27.30		\$35,238.00
.16 Travel					
6/17/2025	JAL	Travel to Richmond for hearing.	0.2	\$760.00	\$152.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.16 Travel					
6/18/2025	JAL	Return travel to DC after hearing.	1.2	\$760.00	\$912.00
6/23/2025	JAL	Travel to Richmond for hearing.	1.1	\$760.00	\$836.00
6/24/2025	JAL	Travel to DC after court hearing.	0.5	\$760.00	\$380.00
6/24/2025	NRM	Travel back from hearing in Richmond.	1.2	\$405.00	\$486.00
Total			4.20		\$2,766.00
.18 Fee Applications-Others					
6/12/2025	NRM	Communications w/ D. Eggert re NERA interim fee application.	0.1	\$810.00	\$81.00
6/19/2025	NRM	Communications w/ MEB re NERA interim fee application.	0.2	\$810.00	\$162.00
6/19/2025	MEB	Communicate w/ NRM re NERA interim fee application (.1); review NERA interim fee notice (.1); review NERA interim fee application (.4); review FTI fee application (.1); communicate w/ NRM re same (.2).	0.9	\$550.00	\$495.00
6/20/2025	MEB	Communicate w/ NRM re NERA interim fee application.	0.1	\$550.00	\$55.00
Total			1.30		\$793.00
Total Professional Services			317.1		\$349,354.00

PERSON RECAP

Person	Title	Hours	Rate	Amount
JAL Jeffrey A. Liesemer	Member	92.8	\$1,520.00	\$141,056.00
JAL Jeffrey A. Liesemer	Member	3.0	\$760.00	\$2,280.00
KCM Kevin C. Maclay	Member	2.0	\$1,970.00	\$3,940.00
ACM Ann C. McMillan	Member	18.3	\$1,200.00	\$21,960.00
TEP Todd E. Phillips	Member	33.6	\$1,455.00	\$48,888.00
JPW James P. Wehner	Member	3.4	\$1,520.00	\$5,168.00
NRM Nathaniel R. Miller	Of Counsel	138.6	\$810.00	\$112,266.00
NRM Nathaniel R. Miller	Of Counsel	1.2	\$405.00	\$486.00
MEB Matthew E. Beckerman	Associate	24.2	\$550.00	\$13,310.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
05/20/2025	Court Reporting/Transcript Service- Hr'g Tr. 5/13/2025 [.10]	\$61.00
05/20/2025	Court Reporting/Transcript Service- Hr'g Tr. 5/6/2025 [.10]	\$37.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
05/21/2025	Court Reporting/Transcript Service- Hr'g Tr. 5/21/2025 [.10]	\$598.00
06/09/2025	Travel - Hotel/Lodging - Richmond Marriott - JAL [.11]	\$291.86
06/16/2025	VERITEXT- Court Reporting/Transcript Service- Eskin Dep. Tr. 5/7/2025 [.11]	\$683.90
06/17/2025	BARRISTER DIGITAL SOLUTIONS, LLC- Outside Duplication Service - 6/18 Hr'g Materials for JAL [.11]	\$364.22
06/17/2025	NATHANIEL R. MILLER- Trvl Exp - Hotel- Hotel stay charges in Richmond, VA 6/17-6/18/25 (NRM) [.16]	\$239.66
06/17/2025	NATHANIEL R. MILLER- Trvl Exp - Meals- Dinner for JAL and NRM in Richmond 6/17 [.16]	\$120.00
06/18/2025	NATHANIEL R. MILLER- Trvl Exp - Meals- Breakfast at Richmond hotel for JAL and NRM 6/18 [.16]	\$58.81
06/18/2025	NATHANIEL R. MILLER- Trvl Exp - Meals- Lunch for JAL and NRM in Richmond 6/18 [.16]	\$18.22
06/18/2025	Taxi- Transportation for JAL and NRM to Richmond and back. [.16]	\$1,750.00
06/23/2025	NATHANIEL R. MILLER- Trvl Exp - Meals- Dinner at Richmond hotel for NRM - 6/23 [.16]	\$52.77
06/24/2025	NATHANIEL R. MILLER- Trvl Exp - Hotel- Hotel stay charges in Richmond, VA 6/23-6/24 [.16]	\$254.65
06/24/2025	NATHANIEL R. MILLER- Trvl Exp - Meals- Breakfast at Richmond hotel for JAL and NRM - 6/24 [.16]	\$66.75
06/24/2025	NATHANIEL R. MILLER- Trvl Exp - Meals- Lunch in Richmond for JAL and NRM 6/24 [.16]	\$18.22
06/24/2025	Taxi- Transportation for JAL and NRM to and from Richmond for Hopeman hearing. [.16]	\$1,750.00
06/30/2025	Database Research - Lexis - NRM - 06/04-29/2025 [.10]	\$105.19
06/30/2025	Database Research - Lexis - MEB - 06/01-19/2025 [.10]	\$42.60
06/30/2025	Database Research - Lexis - JAL - 06/16-24/2025 [.10]	\$63.47
06/30/2025	Database Research - Westlaw - OHR - 06/15-16/2025 [.11]	\$1,573.78
06/30/2025	Database Research - Westlaw - AKH - 06/05-08/2025 [.11]	\$571.19
06/30/2025	Database Research - Westlaw - NRM - 06/17-27/2025 [.11]	\$78.03
06/30/2025	Database Research - Westlaw - AKH - 06/19/2025 [.11]	\$159.74
06/30/2025	Database Research - Westlaw - CG - 06/13-23/2025 [.11]	\$387.80
06/30/2025	Database Research - Westlaw - JAL - 06/16-22/2025 [.11]	\$57.01
06/30/2025	Database Research - Westlaw - MEB - 06/01-30/2025 [.11]	\$761.93
Total Disbursements		\$10,165.80

Total Services	\$349,354.00
Total Disbursements	\$10,165.80
Total Current Charges	\$359,519.80

TASK RECAP

Services

<u>Category</u>	<u>Hours</u>	<u>Amount</u>
.04	0.20	\$291.00
.05	0.90	\$729.00
.07	2.00	\$3,219.00
.10	222.30	\$236,907.50
.11	58.90	\$69,410.50
.15	27.30	\$35,238.00
.16	4.20	\$2,766.00
.18	1.30	\$793.00
	<u>317.10</u>	<u>\$349,354.00</u>

Disbursements

<u>Category</u>	<u>Amount</u>
.10	\$907.26
.11	\$4,929.46
.16	\$4,329.08
	<u>\$10,165.80</u>

BREAKDOWN BY PERSON

<u>Person</u>	<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
TEP Todd E. Phillips	.04	0.20	\$1,455.00	\$291.00
NRM Nathaniel R. Miller	.05	0.90	\$810.00	\$729.00
KCM Kevin C. Maclay	.07	0.60	\$1,970.00	\$1,182.00
TEP Todd E. Phillips	.07	1.40	\$1,455.00	\$2,037.00
JAL Jeffrey A. Liesemer	.10	71.40	\$1,520.00	\$108,528.00
KCM Kevin C. Maclay	.10	0.10	\$1,970.00	\$197.00
ACM Ann C. McMillan	.10	0.40	\$1,200.00	\$480.00
TEP Todd E. Phillips	.10	13.50	\$1,455.00	\$19,642.50
JPW James P. Wehner	.10	2.90	\$1,520.00	\$4,408.00

BREAKDOWN BY PERSON

<u>Person</u>		<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
NRM	Nathaniel R. Miller	.10	115.20	\$810.00	\$93,312.00
MEB	Matthew E. Beckerman	.10	18.80	\$550.00	\$10,340.00
JAL	Jeffrey A. Liesemer	.11	16.90	\$1,520.00	\$25,688.00
KCM	Kevin C. Maclay	.11	1.30	\$1,970.00	\$2,561.00
ACM	Ann C. McMillan	.11	14.60	\$1,200.00	\$17,520.00
TEP	Todd E. Phillips	.11	5.10	\$1,455.00	\$7,420.50
JPW	James P. Wehner	.11	0.50	\$1,520.00	\$760.00
NRM	Nathaniel R. Miller	.11	16.10	\$810.00	\$13,041.00
MEB	Matthew E. Beckerman	.11	4.40	\$550.00	\$2,420.00
JAL	Jeffrey A. Liesemer	.15	4.50	\$1,520.00	\$6,840.00
ACM	Ann C. McMillan	.15	3.30	\$1,200.00	\$3,960.00
TEP	Todd E. Phillips	.15	13.40	\$1,455.00	\$19,497.00
NRM	Nathaniel R. Miller	.15	6.10	\$810.00	\$4,941.00
JAL	Jeffrey A. Liesemer	.16	3.00	\$760.00	\$2,280.00
NRM	Nathaniel R. Miller	.16	1.20	\$405.00	\$486.00
NRM	Nathaniel R. Miller	.18	0.30	\$810.00	\$243.00
MEB	Matthew E. Beckerman	.18	1.00	\$550.00	\$550.00
				<u>317.10</u>	<u>\$349,354.00</u>

CAPLIN & DRYSDALE, CHARTERED

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

*Counsel for the Official
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**TWELFTH MONTHLY FEE STATEMENT OF
CAPLIN & DRYSDALE, CHARTERED FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM JULY 1, 2025, THROUGH JULY 31, 2025**

Name of Applicant:	Caplin & Drysdale, Chartered
Name of Client:	Official Committee of Unsecured Creditors
Date of retention order entered:	September 12, 2024, effective as of July 22, 2024 [Docket No. 202]
Time Period Covered:	July 1, 2025, through July 31, 2025
Total Fees Requested:	<u>\$301,753.50</u>
Total Expenses Requested:	<u>\$1,395.73</u>
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 Caplin & Drysdale, Chartered (“**Caplin**”), as counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in this chapter 11 case, hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) seeking interim payment of (i) \$241,402.80 (80% of \$301,753.50) as compensation for professional services rendered to the Committee and (ii) \$1,395.73 for reimbursement of actual and necessary expenses, for a total of \$242,798.53 for the period from July 1, 2025, through July 31, 2025 (the “**Fee Period**”).

ITEMIZATION OF SERVICES RENDERED AND DISBURSEMENTS INCURRED

1. In support of this Monthly Fee Statement, Caplin 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 providing certain information regarding the Caplin attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Monthly Fee Statement.
 - **Exhibit C** is a summary of the expenses incurred by Caplin during the Fee Period.
 - **Exhibit D** consists of Caplin’s detailed records of fees incurred during the Fee Period, including the number of hours expended (on an aggregate basis) by Caplin members, of counsel, associates, 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. Caplin 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, Caplin respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$242,798.53, consisting of (i) \$241,402.80, which is 80% of the fees incurred for reasonable and necessary professional services rendered by Caplin during the Fee Period, and (ii) \$1,395.73 for actual and necessary costs and expenses.

Dated: September 16, 2025

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)

Todd E. Phillips (admitted *pro hac vice*)

Jeffrey A. Liesemer (VSB No. 35918)

Nathaniel R. Miller (admitted *pro hac vice*)

CAPLIN & DRYSDALE, CHARTERED

1200 New Hampshire Avenue NW, 8th Floor

Washington, DC 20036

Telephone: (202) 862-5000

Facsimile: (202) 429-3301

kmaclay@capdale.com

tphillips@capdale.com

jliesemer@capdale.com

nmiller@capdale.com

Counsel for the Official

Committee of Unsecured Creditors

EXHIBIT A

SUMMARY OF FEES BY PROJECT CATEGORY

JULY 1, 2025, THROUGH JULY 31, 2025

PROJECT CATEGORY	HOURS	FEES
(.02) Asset Disposition	0.0	\$0.00
(.03) Business Operations	0.0	\$0.00
(.04) Case Administration & Calendar Control	0.0	\$0.00
(.05) Claims Administration & Objections	0.0	\$0.00
(.06) Employee Benefits/Pensions	0.0	\$0.00
(.07) Fee Applications - Self	4.4	\$7,097.00
(.08) Objections - Fee/Retention Applications	0.0	\$0.00
(.09) Financing	0.0	\$0.00
(.10) Litigation	88.0	\$95,586.50
(.11) Plan & Disclosure Statement	165.4	\$168,993.00
(.12) Relief from Stay Proceedings	0.0	\$0.00
(.13) Tax Issues	0.0	\$0.00
(.15) Committee Meetings/Conferences	18.1	\$22,138.00
(.16) Travel	0.0	\$0.00
(.17) Docket Review & File Maintenance	0.0	\$0.00
(.18) Fee Applications - Others	8.2	\$7,939.00
(.19) Retention Applications - Others	0.0	\$0.00
(.20) Retention Applications - Self	0.0	\$0.00
TOTAL	284.1	\$301,753.50

EXHIBIT B

SUMMARY OF FEES BY PROFESSIONAL²

JULY 1, 2025, THROUGH JULY 31, 2025

COMPENSATION BY PROFESSIONAL				
NAME OF PROFESSIONAL	POSITION / ADMISSION DATE / DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS	TOTAL COMPENSATION
Ann C. McMillan	Member / 1984 / Bankruptcy	\$1,200	4.9	\$5,880.00
Kevin C. Maclay	Member / 1994 / Bankruptcy	\$1,970	1.7	\$3,349.00
Todd E. Phillips	Member / 2005 / Bankruptcy	\$1,455	21.7	\$31,573.50
Jeffrey A. Liesemer	Member / 1993 / Bankruptcy	\$1,520	96.2	\$146,224.00
James P. Wehner	Member / 1995 / Bankruptcy	\$1,520	3.3	\$5,016.00
Nathaniel R. Miller	Of Counsel / 2016 / Bankruptcy	\$810	83.9	\$67,959.00
Katy C. Zende	Of Counsel / 2017 / Bankruptcy	\$760	9.2	\$6,992.00
Matthew E. Beckerman	Associate / 2022 / Bankruptcy	\$550	63.2	\$34,760.00
TOTAL			284.1	\$301,753.50

² Nonworking travel time is billed at one-half of the professional's usual hourly rate.

EXHIBIT C

SUMMARY OF EXPENSES INCURRED DURING THE FEE PERIOD

EXPENSE CATEGORY	AMOUNT
Court Reporter Transcript Services	\$80.75
Database Research	\$698.39
Photocopies	\$60.21
Travel	\$556.38
TOTAL	\$1,395.73

EXHIBIT D

CAPLIN & DRYSDALE

1200 New Hampshire Avenue NW 8th Floor
Washington, DC 20036

Telephone: (202) 862-5000

Federal Tax I.D. No.: 52-1226629

www.capdale.com

Fax: (202) 429-3301

Official Committee of Unsecured Creditors of Hopeman Brothers, Inc.

Invoice #: 363297

Page: 1

RE: Hopeman Brothers, Inc. bankruptcy

For Professional Services Rendered Through July 31, 2025

Total Services	\$301,753.50
Total Disbursements	\$1,395.73
Total Current Charges	\$303,149.23

Remittance Advice

[Payment is due upon receipt. If you should have any questions, please email accounting@capdale.com.](mailto:accounting@capdale.com)

Check Payable To:

Caplin & Drysdale, Chartered
Attn: Accounts Receivable
1200 New Hampshire Avenue NW 8th Floor
Washington, DC 20036

Wire Transfer:

Receiving Bank: Bank of America
ABA Wire Routing Number: 026009593
ABA ACH Routing Number: 054001204
Swift Code: BOFAUS3N
Beneficiary: Caplin & Drysdale, Chartered
Account Number: 001920814809

Credit Card:

We accept all major card companies. A service fee of 2.4% for Corporate Cards and 2.95% for Individual Cards will be added to all payments.

Please return this remittance page with your payment. Thank you.

CAPLIN & DRYSDALE

1200 New Hampshire Avenue NW 8th Floor
Washington, DC 20036

Telephone: (202) 862-5000

Federal Tax I.D. No.: 52-1226629

www.capdale.com

Fax: (202) 429-3301

Official Committee of Unsecured Creditors of Hopeman Brothers, Inc.

September 16, 2025

Invoice #: 363297

Page: 1

RE: Hopeman Brothers, Inc. bankruptcy

For Professional Services Rendered Through July 31, 2025

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.07 Fee Applications-Self					
7/1/2025	KCM	Review/edit May monthly fee app.	0.8	\$1,970.00	\$1,576.00
7/4/2025	TEP	Communications w/ KNF re fee application (.1); review same (.2).	0.3	\$1,455.00	\$436.50
7/7/2025	TEP	Communications w/ JAG, NRM, and KCM re monthly fee application (.2); communicate w/ KCM re same (.1).	0.3	\$1,455.00	\$436.50
7/17/2025	TEP	Communications w/ JAG re monthly fee application (.2); communications w/ NRM re interim fee application (.1).	0.3	\$1,455.00	\$436.50
7/24/2025	TEP	Prepare and edit monthly fee application.	0.2	\$1,455.00	\$291.00
7/25/2025	TEP	Review and edit monthly fee application.	0.7	\$1,455.00	\$1,018.50
7/27/2025	TEP	Review and edit monthly fee application (.2); communicate w/ JAG re same (.1); communicate w/ CG re same (.1).	0.4	\$1,455.00	\$582.00
7/29/2025	KCM	Review/edit June monthly fee app.	0.9	\$1,970.00	\$1,773.00
7/31/2025	JAL	Review monthly fee statement.	0.2	\$1,520.00	\$304.00
7/31/2025	NRM	Review monthly fee statement (.2); communications w/ KNF re same (.1).	0.3	\$810.00	\$243.00
Total			4.40		\$7,097.00
.10 Litigation					

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
7/1/2025	JAL	Attend Rule 30(b)(6) depositions of the Debtor (4.9); revise deposition notice objection (1.9); edit draft MTD (1.6); communications w/ TEP and NRM re case status and next steps (.5); communicate w/ D. Cox re depositions (.2); correspondence w/ D. Cox re discovery issues (.3); review and comments on revised deposition notice objection (.2); review correspondence from D. Cox re depositions (.1).	9.7	\$1,520.00	\$14,744.00
7/1/2025	TEP	Communicate w/ JAL and NRM re deposition prep (.1); communications w/ JAL and NRM re reference withdrawal status, MTD, and next steps (.3); communicate w/ NRM re MTD (.1); review revisions to MTD and communicate w/ NRM re same (.4); communications w/ NRM re deposition prep (.2); communications w/ JAL and NRM re next steps (.2).	1.3	\$1,455.00	\$1,891.50
7/1/2025	NRM	Communications w/ TEP and JAL re MTD and objection to withdrawal of the reference in Liberty Mutual adversary proceeding (.3); revise same (2.8); communications w/ TEP, JAL, MEB, CG, and KCM re same (.1); communications w/ JAL re same (.1); communications w/ MEB re same (.2); communicate w/ JAL re same (.1); communications w/ D. Cox, J. Raskin, JAL, and TEP re same (.1); communications w/ CG re same (.1); communications w/ TEP and D. Cox re 30(b)(6) deposition prep (.1); communications w/ D. Salzman re same (.1); communicate w/ CG re same (.1); communications w/ TEP and JAL re same (.1); communications w/ T. Branham, JAL, TEP, and D. Cox re same (.1); communications w/ JAL and MEB re objection to Rule 30(b)(6) notice (.2); communications w/ CG re same (.1); communications w/ D. Cox, JAL, and TEP re same (.1); communications w/ JAL and TEP re same (.1); revise same (1.2); research re same (.4); confer w/ MEB re same (multiple) (.2); communications w/ D. Cox re deposition (.2).	6.8	\$810.00	\$5,508.00
7/1/2025	MEB	Communication w/ TEP, JAL, NRM, and CG re revised MTD Liberty's adversary complaint (.3); review revisions to MTD Liberty adversary complaint (.8); research caselaw re same (.2); communicate w/ NRM re same (.1).	1.4	\$550.00	\$770.00
7/1/2025	MEB	Conferences w/ NRM re 30(b)(6) deposition objection (.2); communication w/ JAL and NRM re same (.2).	0.4	\$550.00	\$220.00
7/2/2025	ACM	Confer w/ TEP, D. Cox, T. Branham, and JAL re deposition prep (partial) (1.3); communications w/ TEP re same (.1); teleconference w/ TEP re same (.1).	1.5	\$1,200.00	\$1,800.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
7/2/2025	JAL	Confer w/ TEP, NRM, D. Cox, T. Branham, and ACM (partial) re deposition prep (1.9); correspondence w/ NRM re same (.2); review and analyze materials re potential objection (.6); revise objection to motion to withdraw reference (2.2); communications w/ NRM re case status and next steps (.1); confer w/ T. Brown, T. Long, D. Cox, and NRM re confirmation discovery (.5); review correspondence from T. Long re discovery matters (.2); communications w/ NRM and TEP re discovery matters and next steps (.3); communications w/ NRM re anticipated motion practice (.5); review correspondence from P. Santelle re document production (.1).	6.6	\$1,520.00	\$10,032.00
7/2/2025	TEP	Prepare for deposition prep meeting (.4); confer w/ JAL, NRM, D. Cox, T. Branham, and ACM (partial) re deposition prep (1.9); confer w/ ACM re same (.1); communications w/ JAL, ACM, and NRM re outstanding tasks (.2); communications w/ JAL, NRM, and D. Cox re MTD and related issues (.2); confer w/ NRM re same (.1).	2.9	\$1,455.00	\$4,219.50
7/2/2025	NRM	Confer w/ T. Branham, TEP, JAL, ACM (partial), and D. Cox re 30(b)(6) deposition prep (1.9); communications w/ JAL, TEP, and JPW re production (.2); confer w/ D. Cox re same (.2); confer w/ JAL, D. Cox, T. Brown, and T. Long re confirmation discovery and briefing issues (.5); communications w/ CG re objection to 30(b)(6) deposition and MTD (.1); revise same (.5); confer w/ TEP re same (.1); communicate w/ TEP and JAL re same (.1); serve objection and production (.2); communicate w/ CG re same (.1); communications w/ JAL, JPW, and TEP re same (.2); confer w/ D. Cox re same (.2); communications w/ D. Cox re same (.1); review C. Tully deposition draft errata sheet (.1); communications w/ JAL re same (.1); review correspondence from T. Long re clawback (.1); review correspondence from P. Santelle re same (.1).	4.8	\$810.00	\$3,888.00
7/2/2025	MEB	Communications w/ NRM re objection to motion to withdraw reference in Liberty adversary proceeding (.2); research caselaw re same (.7); communicate w/ NRM re same (.2); communication w/ JAL and NRM re same (.3); review Roussel notice of hearing on MTD (.1); procedural research re same (.2); review objection to motion to withdraw the reference (.4); review MTD (.4); communication w/ NRM and CG re MTD (.2).	2.7	\$550.00	\$1,485.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
7/3/2025	TEP	Communications w/ NRM re 30(b)(6) deposition (.2); communications w/ NRM re reference withdrawal brief (.1); communications w/ NRM re deposition and adversary proceeding issues (.2); communications w/ NRM re draft withdrawal objection (.2).	0.7	\$1,455.00	\$1,018.50
7/3/2025	MEB	Communication w/ JAL and NRM re standing to file MTD in Liberty adversary proceeding (.2); research caselaw re same (.2); communicate w/ NRM re same (.1); review MTD (.1); communicate w/ NRM re same (.1).	0.7	\$550.00	\$385.00
7/4/2025	TEP	Review and edit withdrawal objection (.3); communications w/ NRM re same (.1).	0.4	\$1,455.00	\$582.00
7/4/2025	NRM	Communications w/ TEP re objection to motion to withdraw the reference (.1); research re same (.2).	0.3	\$810.00	\$243.00
7/5/2025	JAL	Correspondence w/ TEP and NRM re objection to withdrawal of the reference.	0.3	\$1,520.00	\$456.00
7/5/2025	TEP	Review and edit reference withdrawal objection (.3); communications w/ JAL and NRM re same (.2); review D. Cox and J. Raskin communications re insurance issue (.2).	0.7	\$1,455.00	\$1,018.50
7/5/2025	NRM	Communications w/ TEP and JAL re objection to motion to withdraw the reference (.3); revise same (.6); communications w/ TEP, JAL, and CG re same (.1); communications w/ CG re same (.1); review communications from D. Cox and T. Branham re deposition errata sheet (.1); review communications from J. Raskin and D. Cox re Wellington Agreement issues (.1).	1.3	\$810.00	\$1,053.00
7/7/2025	JAL	Correspondence w/ TEP, NRM, and KCM re objection to withdrawal of reference (.3); review draft objection (.3); review correspondence from K. Finnerty and T. Long re discovery matters (.1); review and analyze materials re Liberty adversary proceeding (.4).	1.1	\$1,520.00	\$1,672.00
7/7/2025	NRM	Review correspondence from K. Finnerty re confirmation discovery.	0.1	\$810.00	\$81.00
7/7/2025	MEB	Communicate w/ NRM re objection to motion to withdraw (.2); review caselaw cited in same (.8).	1.0	\$550.00	\$550.00
7/8/2025	JPW	Communications KCZ re expert issues.	0.4	\$1,520.00	\$608.00
7/8/2025	MEB	Communicate w/ NRM re counter-designations in Liberty appeal of claim denial.	0.1	\$550.00	\$55.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
7/9/2025	JAL	Confer w/ D. Cox, JPW, KCZ, and NRM re expert issues and schedule (.6); confer w/ T. Brown, J. Rovira, T. Long, D. Cox, and NRM re discovery/hearing schedule and next steps (.3); attend meet and confer w/ J. Rovira, NRM, P. Santelle, C. Cockerham, D. Foley, K. Finnerty, M. Carolan, B. Bell, D. Cox, D. Golding, J. Burke, J. Marshall, J. Taylor, L. Davis, T. Long, and T. Brown re discovery, briefing, and hearing schedule (.5); attend meet and confer w/ B. Bell, C. Cockerham, D. Cox, J. Rovira, J. Taylor, P. Santelle, D. Foley, J. Burke, K. Finnerty, L. Davis, M. Carolan, NRM, T. Long (partial), and T. Brown (partial) re modifying hearing and discovery schedule (.5); confer w/ NRM re developments and next steps (.2); correspondence w/ D. Salzman, K. Harrison, and D. Cox re revised discovery and hearing schedule (.2); correspondence w/ NRM, TEP, D. Cox, and D. Salzman re modified discovery, briefing, and hearing schedule (.6).	2.9	\$1,520.00	\$4,408.00
7/9/2025	JPW	Confer w/ D. Cox, JAL, KCZ, and NRM re expert issues (.6); review expert materials (.7); review case update (.4).	1.7	\$1,520.00	\$2,584.00
7/9/2025	KCZ	Confer w/ JPW,, JAL, NRM, D. Cox re expert issues (0.6); analyze PO issues (1.1).	1.7	\$760.00	\$1,292.00
7/9/2025	NRM	Confer w/ D. Cox, JPW, KCZ, and JAL re expert issues and schedule (.6); confer w/ T. Brown, J. Rovira, T. Long, D. Cox, and JAL re discovery/hearing schedule and next steps (.3); attend meet and confer w/ J. Rovira, JAL, P. Santelle, C. Cockerham, D. Foley, K. Finnerty, M. Carolan, B. Bell, D. Cox, D. Golding, J. Burke, J. Marshall, J. Taylor, L. Davis, T. Long, and T. Brown re discovery, briefing, and hearing schedule (.5); attend meet and confer w/ B. Bell, C. Cockerham, D. Cox, J. Rovira, J. Taylor, P. Santelle, D. Foley, J. Burke, K. Finnerty, L. Davis, M. Carolan, JAL, T. Long (partial), and T. Brown (partial) re modifying hearing and discovery schedule (.5); confer w/ JAL re developments and next steps (.2).	2.1	\$810.00	\$1,701.00
7/12/2025	NRM	Communications w/ TEP re Liberty Mutual adversary proceeding.	0.1	\$810.00	\$81.00
7/14/2025	JAL	Correspondence w/ T. Brown and D. Cox re expert issue.	0.2	\$1,520.00	\$304.00
7/14/2025	MEB	Review Liberty appeal designations (.1); draft counter-designation re same (.4); communicate w/ NRM re same (.2).	0.7	\$550.00	\$385.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
7/16/2025	JAL	Teleconference w/ S. Andelman, R. Van Epps, T. Brown, NRM, W. Scheff, M. Berkin, D. Cox, J. Rovira, T. Long, KCZ (partial), and C. Tully re deposition prep and potential rebuttal report (1.5); confer w/ NRM re developments and next steps (.1); review and analyze materials re FCR appeal (.3).	1.9	\$1,520.00	\$2,888.00
7/16/2025	KCZ	Teleconference w/ S. Andelman, R. Van Epps, T. Brown, NRM, W. Scheff, M. Berkin, D. Cox, J. Rovira, T. Long, JAL, and C. Tully re deposition prep and potential rebuttal report (partial) (1.0); confer w/ NRM re same (0.1); review liquidation analysis and Scarcella report (0.6).	1.7	\$760.00	\$1,292.00
7/16/2025	NRM	Communications w/ TEP re rebuttal report (.1); confer w/ KCZ re same (.1); communications w/ KCZ re same (.1); confer w/ T. Brown, T. Long, J. Rovira, W. Scheff, M. Berkin, C. Tully, JAL, KCZ (partial), R. Van Epps, and D. Cox re same (1.5); confer w/ JAL re same (.1).	1.9	\$810.00	\$1,539.00
7/16/2025	MEB	Communicate w/ NRM re Chubb brief re FCR appointment.	0.1	\$550.00	\$55.00
7/17/2025	NRM	Communications w/ JAL and MEB re FCR appeal brief procedural issues (.1); review memorandum re same (.3); communications w/ MEB re same (.1).	0.5	\$810.00	\$405.00
7/17/2025	MEB	Communications w/ NRM re Chubb brief re FCR appointment (.4); review and analyze related filings re same (.7).	1.1	\$550.00	\$605.00
7/18/2025	NRM	Communications w/ JAL and MEB re FCR appeal brief (.1); communications w/ MEB re same (.1).	0.2	\$810.00	\$162.00
7/18/2025	MEB	Communicate w/ JAL and NRM re FCR appeal briefing (.1); communicate w/ NRM re same (.1).	0.2	\$550.00	\$110.00
7/21/2025	NRM	Revise counter-designations for Liberty claim appeal (.3); research re same (.9); communications w/ JAL and MEB re same (.1); communications w/ JAL, D. Cox, and J. Raskin re Scarcella deposition prep (.1); review memorandum from MEB re FCR appeal brief (.2); communications w/ MEB re same (.1).	1.7	\$810.00	\$1,377.00
7/21/2025	MEB	Revise counter-designations re Liberty appeal of claim disallowance (.1); communicate w/ NRM re same (.1); review Chubb appeal brief re FCR appointment (.8); draft memo re same (.8).	1.8	\$550.00	\$990.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
7/22/2025	JAL	Review materials in prep for confer w/ Debtor's counsel and FTI (.3); confer w/ J. Raskin, NRM, T. Brown, C. Tully, M. Berkin, T. Long, S. Andelman, D. Cox, W. Scheff, and J. Rovira re Scarcella deposition prep (.7); confer w/ TEP re same (.1); review and comments on draft counter-designations in Liberty claim appeal (.5); edit Liberty appeal counter-designations (.4).	2.0	\$1,520.00	\$3,040.00
7/22/2025	TEP	Confer w/ JAL re Scarcella deposition prep.	0.1	\$1,455.00	\$145.50
7/22/2025	NRM	Communications w/ JAL re Liberty appeal counter-designations and confirmation brief revisions (.1); communicate w/ JAL and MEB re same (.1); communications w/ CG re same (.3); communications w/ JAL, TEP, D. Cox, and J. Raskin re same (.1); communications w/ JAL re same (.1).	0.7	\$810.00	\$567.00
7/22/2025	NRM	Attend Scarcella deposition prep call w/ J. Raskin, T. Brown, T. Long, D. Cox, JAL, S. Andelman, J. Rovira, M. Berkin, W. Scheff, and C. Tully.	0.7	\$810.00	\$567.00
7/23/2025	JAL	Attend deposition of M. Scarcella (3.6); communicate w/ NRM re developments and next steps (.1).	3.7	\$1,520.00	\$5,624.00
7/25/2025	JAL	Review and analyze FTI communication and accompanying materials re Scarcella report (.9); confer w/ JPW and KCZ re expert issues (.3).	1.2	\$1,520.00	\$1,824.00
7/25/2025	JPW	Review Scarcella report (.5); review reposed testimony outline for call (.4); teleconference JAL and KCZ re expert issues (.3).	1.2	\$1,520.00	\$1,824.00
7/25/2025	KCZ	Confer w/ JPW and JAL re expert issues (0.3); prep re same (0.3).	0.6	\$760.00	\$456.00
7/25/2025	MEB	Communications w/ NRM re FCR appeal brief (.3); review related filing re same (.4); draft memo re same (.3); draft FCR appeal outline (.6).	1.6	\$550.00	\$880.00
7/26/2025	MEB	Communicate w/ JAL and NRM re FCR appeal outline.	0.1	\$550.00	\$55.00
7/28/2025	NRM	Communications w/ JAL and TEP re case status and next steps (.2); communicate w/ JAL re same (.1); confer w/ T. Long re FCR appeal issues (.2); research re same (.7); review communications from JAL re same (.2).	1.4	\$810.00	\$1,134.00
7/28/2025	NRM	Confer w/ T. Long re FCR appeal issues (.2); research re same (.7); review communications from JAL re same (.2).	1.1	\$810.00	\$891.00
7/28/2025	MEB	Communicate w/ JAL and NRM re FCR appeal research issues.	0.1	\$550.00	\$55.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
7/29/2025	NRM	Communications w/ JAL re FCR appeal brief (.1); communications w/ JAL and MEB re same (.1); confer w/ T. Long re same (.1); confer w/ MEB re same (multiple) (.4).	0.7	\$810.00	\$567.00
7/29/2025	MEB	Conferences w/ NRM re FCR appeal research issues (.4); research caselaw re same (.1); communicate w/ JAL and NRM re same (.1).	0.6	\$550.00	\$330.00
7/30/2025	JAL	Conference w/ NRM and MEB re draft brief in FCR appointment appeal (.5); review and analyze materials re same (.4); confer w/ NRM re status and next steps (.1).	1.0	\$1,520.00	\$1,520.00
7/30/2025	NRM	Confer w/ JAL re case status (.1); confer w/ JAL and MEB re FCR appeal brief (.5); communications w/ MEB re same (.1); confer w/ T. Long re same (.2).	0.9	\$810.00	\$729.00
7/30/2025	MEB	Confer w/ JAL and NRM re FCR appeal brief (.5); communicate w/ NRM re same (.1); research re procedural issues re same (.4); draft memo re same (.4); communicate w/ JAL and NRM re same (.1).	1.5	\$550.00	\$825.00
7/31/2025	NRM	Review memorandum from MEB re FCR appellee brief (.2); communications w/ MEB re same (.2); review Debtor's draft objections to Insurers' preliminary confirmation exhibits (.3); communications w/ JAL re same (.1); communicate w/ TEP re same (.1); communications w/ J. Raskin, JAL, and TEP re same (.1); communications w/ Debtor's counsel and Co-Counsel re revisions to same (.1).	1.1	\$810.00	\$891.00
7/31/2025	NRM	Review memorandum re FCR appellee brief (.2); communications w/ MEB re same (.2).	0.4	\$810.00	\$324.00
7/31/2025	MEB	Research re procedural issue (.3); communication w/ NRM re same (.2); draft FCR brief (1.1).	1.6	\$550.00	\$880.00
Total			88.00		\$95,586.50
.11 Plan & Disclosure Statement					
7/1/2025	JAL	Communications D. Cox re plan-related matters (.2); correspondence w/ NRM re plan-related matters (.1); correspondence w/ TEP, NRM, and KCM re status of pending matters and next steps (.3).	0.6	\$1,520.00	\$912.00
7/2/2025	ACM	Revise TDP (1.1); communications w/ JAL re same (.2).	1.3	\$1,200.00	\$1,560.00
7/2/2025	JAL	Correspondence w/ TEP, NRM, and ACM re plan documents (.2); review revised TDP (.2); revise and edit draft plan exhibit (1.1).	1.5	\$1,520.00	\$2,280.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/2/2025	NRM	Communications w/ MEB re plan document (.1); communications w/ MEB re retained causes of action (.3); revise same (2.1); communications w/ JAL and MEB re same (.2).	2.7	\$810.00	\$2,187.00
7/5/2025	MEB	Communicate w/ NRM re retained causes of action schedule.	0.1	\$550.00	\$55.00
7/7/2025	JAL	Review correspondence from D. Cox re confirmation issue (.2); correspondence w/ NRM re confirmation briefing and hearing prep (.2).	0.4	\$1,520.00	\$608.00
7/7/2025	TEP	Review D. Cox, JAL, and NRM communications re confirmation filings (.2); communications w/ NRM re same (.1); communications w/ NRM re next steps (.2); communications w/ JAL and NRM re POC issue (.3).	0.8	\$1,455.00	\$1,164.00
7/7/2025	NRM	Communications w/ JAL re confirmation hearing prep (.2); review communications from D. Cox re C. Tully errata sheet (.1); analyze objections to plan (2.2); confer w/ T. Long re same (.1); communications w/ T. Long re same (.1); communications w/ TEP, JAL, and D. Cox re same (.3); communications w/ T. Brown, T. Long, J. Rovira, JAL, TEP, and D. Cox re same (.1); communications w/ TEP re causes of action schedule (.1).	3.2	\$810.00	\$2,592.00
7/7/2025	MEB	Communicate w/ NRM re Insurers' objections to confirmation (.1); review Hartford Insurers' limited objection to confirmation (.1); review claims issue memo (.3); communicate w/ NRM re same (.1); review Chubb objection to confirmation (.2).	0.8	\$550.00	\$440.00
7/8/2025	JAL	Communications NRM and TEP re confirmation briefing and hearing prep (.2); correspondence w/ D. Cox and NRM re same (.4); communications w/ NRM re same (.3); prep for conference w/ Debtor's counsel (.5); communications w/ NRM re developments and next steps (.1); confer w/ T. Brown, J. Rovira, T. Long, D. Cox, TEP (partial), and KCZ (partial) re confirmation objections (1.1); correspondence w/ J. Raskin and D. Cox re insurance-related issues (.8).	3.4	\$1,520.00	\$5,168.00
7/8/2025	TEP	Confer w/ T. Brown, J. Rovira, T. Long, D. Cox, JAL, and KCZ (partial) re confirmation objections (partial).	0.4	\$1,455.00	\$582.00
7/8/2025	KCZ	Confer w/ T. Brown, J. Rovira, T. Long, D. Cox, TEP (partial), and JAL re confirmation objections (partial) (0.6); communications w/ NRM re Insurers' objections (0.4); review and analyze Chubb objection and Scarcella report (3.8); revise case update (0.4).	5.2	\$760.00	\$3,952.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/9/2025	JAL	Review and analyze materials re confirmation briefing and hearing prep (2.3); correspondence w/ TEP and NRM re confirmation briefing (.2); review and comments on draft confirmation hearing exhibit list (.3); confer w/ NRM and D. Cox (partial) re draft exhibit list and proposed pretrial schedule (.2).	3.0	\$1,520.00	\$4,560.00
7/9/2025	TEP	Communications w/ JAL and NRM re confirmation briefing and next steps (.3); communications w/ JPW re next steps (.4).	0.7	\$1,455.00	\$1,018.50
7/9/2025	NRM	Confer w/ T. Long re confirmation hearing schedule (multiple) (.4); communications w/ TEP, JPW, and KCZ re same (.1); confer w/ MEB re confirmation research (multiple) (.2); communications w/ JAL and TEP re same (.3); communications w/ D. Cox, JAL, and TEP re same (.1); review draft witness and exhibit list (.4); communications w/ JAL and D. Cox re same (.2); communications w/ JAL, T. Long, D. Cox, J. Rovira, and T. Brown re same (.1); communications w/ T. Long re same (.1); communications w/ CG, JAL, and TEP re same (.1); communications w/ MEB re insurance obligations issues (.1); confer w/ JAL and D. Cox (partial) re draft exhibit list and proposed pretrial schedule (.2).	2.3	\$810.00	\$1,863.00
7/9/2025	MEB	Communication w/ JAL and NRM re Debtor's draft brief in support of confirmation (.2); review Travelers' objection to confirmation (.3); draft memo re trust-related issues (1.9); communicate w/ NRM re same (.1); research caselaw re ongoing business requirement (1.1); draft memo re same (.8); conferences w/ NRM re confirmation brief research (.2); research caselaw re same (1.2).	5.8	\$550.00	\$3,190.00
7/10/2025	JAL	Communicate w/ Debtor's counsel, D. Cox, NRM, and TEP re Insurers' proposed pretrial and briefing schedule on confirmation (.7); communications w/ NRM re developments and next steps (.3); review and analyze materials re confirmation briefing and hearing prep (1.3); review witness disclosures and exhibit lists for confirmation hearing (.3); communication to TEP, NRM, and D. Cox re same (.1); analyze potential objection responses and resolutions (.8).	3.5	\$1,520.00	\$5,320.00
7/10/2025	TEP	Confer w/ T. Brown re case admin issue and constituent document inquiry (.1); review communications re confirmation filings (.2).	0.3	\$1,455.00	\$436.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/10/2025	NRM	Confer w/ MEB re classification issues (multiple) (.3); review Insurers' proposed briefing schedule (.2); communications w/ JAL and TEP re same (.1); review communications from D. Cox, JAL, and J. Rovira re same (.2); confer w/ T. Long re confirmation issues (multiple) (.4).	1.2	\$810.00	\$972.00
7/10/2025	MEB	Communication w/ NRM re confirmation objection research (.4); conferences w/ NRM re same (.3); research re caselaw re same (.9); review Debtor draft brief reply (.6); research re caselaw re same (1.2); research re caselaw re equality of treatment (2.1); communicate w/ TEP, ACM, and NRM re trust-related issues (.1); draft insert re ongoing business requirement (1.6).	7.2	\$550.00	\$3,960.00
7/11/2025	ACM	Communicate w/ TEP re confirmation objections.	0.1	\$1,200.00	\$120.00
7/11/2025	JAL	Review correspondence from J. Rovira re confirmation-related pretrial matters (.1); review and analyze potential objection responses and resolutions (5.8); communicate w/ NRM re hearing prep and next steps (.1).	6.0	\$1,520.00	\$9,120.00
7/14/2025	JAL	Review and propose edits re confirmation brief (1.4); review and analyze potential objection responses and resolutions (2.2).	3.6	\$1,520.00	\$5,472.00
7/14/2025	NRM	Revise confirmation brief (.3); communications w/ JAL re same (.1); communications w/ B. Bell and T. Long re same (.1); communications w/ JAL re same (.1).	0.6	\$810.00	\$486.00
7/15/2025	JAL	Confer w/ NRM re status of confirmation-related matters and next steps (.1); review and analyze confirmation briefing (.6).	0.7	\$1,520.00	\$1,064.00
7/15/2025	TEP	Communicate w/ T. Brown re constituent document inquiry.	0.1	\$1,455.00	\$145.50
7/15/2025	NRM	Confer w/ S. Andelman re confirmation prep (.2); communications w/ S. Andelman re same (.1); communications w/ JAL re same (.1); communications w/ Debtor's counsel and UCC professionals re same (.1); confer w/ JAL re confirmation briefing (.1); confer w/ MEB re confirmation briefing research (.3); revise confirmation brief re same (1.2); research re same (.8).	2.9	\$810.00	\$2,349.00
7/15/2025	MEB	Confer w/ NRM re confirmation objection (.3); communication w/ NRM re same (.1); draft insert re confirmation brief (1.3); research caselaw re same (.3).	2.0	\$550.00	\$1,100.00
7/16/2025	TEP	Communicate w/ T. Brown re constituent document inquiry.	0.1	\$1,455.00	\$145.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/16/2025	NRM	Confer w/ T. Long re confirmation issues (.1); confer w/ MEB re same (.2); communications w/ MEB re same (.1); communications w/ JAL, CG, KNF, KCM, and TEP re FCR brief (.1); revise section of confirmation brief re classification issues (.7); research re same (1.6).	2.8	\$810.00	\$2,268.00
7/16/2025	MEB	Confer w/ NRM re confirmation research.	0.2	\$550.00	\$110.00
7/17/2025	JAL	Draft potential plan amendments (1.6); communications w/ TEP, NRM, D. Cox, and J. Raskin re same (1.4); draft communication to Debtor's counsel re potential plan modifications (1.2).	4.2	\$1,520.00	\$6,384.00
7/17/2025	JAL	Review and analyze materials re confirmation briefing (2.6); communications w/ NRM re confirmation briefing, research, and next steps (.2).	2.8	\$1,520.00	\$4,256.00
7/17/2025	JAL	Review and analyze communication from J. Raskin re potential plan modifications (.2); analyze materials re confirmation briefing (2.6); call w/ NRM re confirmation briefing, research, and next steps (.2).	3.0	\$1,520.00	\$4,560.00
7/17/2025	TEP	Communications w/ KCM, JAL, and NRM re case status (.1); review JAL and D. Cox communications re briefing (.2).	0.3	\$1,455.00	\$436.50
7/17/2025	NRM	Communications w/ KNF re confirmation hearing prep (.1); confer w/ D. Salzman re same (.1); communications w/ D. Salzman re same (.1); revise section of confirmation brief re insurance assignment issues (.9); research re claim treatment (.8); confer w/ JAL re same (.2).	2.2	\$810.00	\$1,782.00
7/17/2025	MEB	Research caselaw re best interests of the creditor test (1.4); draft memo re same (.6); communicate w/ NRM re confirmation brief research (.2); research caselaw re same (1.4); draft memo re same (2.3).	5.9	\$550.00	\$3,245.00
7/18/2025	JAL	Review and analyze materials re confirmation briefing (3.2); review correspondence from B. Bell re confirmation brief (.1); review and comments on draft confirmation brief (1.4).	4.7	\$1,520.00	\$7,144.00
7/18/2025	TEP	Confer w/ NRM re confirmation briefing (.2); review communications re same (.2).	0.4	\$1,455.00	\$582.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/18/2025	NRM	Communications w/ MEB re treatment of contracts under plan (.1); communications w/ MEB re insert to confirmation brief re assignment of insurance rights (.2); revise same (2.2); research re same (1.4); conferences w/ MEB re same (.4); communications w/ JAL and MEB re same (.1); communications w/ MEB re revised confirmation brief (.2); review same (.8); research re proposed finding re insurance treatment (.7); communications w/ MEB re same (.1); research re classification issues (2.8); revise section of confirmation brief re same (1.1); communications w/ MEB re same (.1); communications w/ JAL and MEB re same (.1); confer w/ TEP re same (.2).	10.5	\$810.00	\$8,505.00
7/18/2025	MEB	Draft confirmations brief inserts (4.1); review plan re same (.3); communicate w/ NRM re same (.3); conferences w/ NRM re same (.4); draft confirmation brief insert (.4); research caselaw re same (.2); communicate w/ NRM re same (.2).	5.9	\$550.00	\$3,245.00
7/19/2025	JAL	Revise confirmation brief insert.	1.2	\$1,520.00	\$1,824.00
7/19/2025	NRM	Communications w/ JAL and MEB re classification issues (.1); communications w/ MEB re same (.3); review revisions from MEB re same (.2); communications w/ TEP, JAL, and MEB re same (.1); revise same (.2).	0.9	\$810.00	\$729.00
7/19/2025	MEB	Review plan-related documents (.4); communication w/ NRM re same (.3); draft memo re same (.6).	1.3	\$550.00	\$715.00
7/20/2025	NRM	Communications w/ MEB, JAL, and TEP re revisions to confirmation brief re classification of claims (.2); communications w/ TEP re same (.1); revise same (1.2); research re same (.4); review correspondence from D. Cox re same (.2); communications w/ KCM re same (.6); communications w/ MEB re same (.2); communications w/ JAL and MEB re same (.1); communications w/ KCM, TEP, JAL, and MEB re same (.1); revise section of confirmation brief re ongoing business issues (.8).	3.9	\$810.00	\$3,159.00
7/20/2025	MEB	Communicate w/ NRM re plan confirmation objection research.	0.1	\$550.00	\$55.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/21/2025	NRM	Correspond w/ B. Bell, JAL, T. Brown, J. Rovira, T. Long, TEP, J. Raskin, and D. Cox re confirmation brief (.1); correspond w/ MEB re same (.2); confer w/ MEB re revisions to confirmation brief (multiple) (.6); confer w/ B. Bell re same (.2); review correspondence from B. Bell re same (.1); research re claims issues (1.6); revise memorandum re same (.9); communications w/ MEB re confirmation brief (.1); communications w/ JAL and MEB re same (.1).	3.9	\$810.00	\$3,159.00
7/21/2025	MEB	Communicate w/ KCM, TEP, JAL and NRM re confirmation objection research (.1); conferences w/ NRM re same (.6); review plan (.2); review TDP (.2); revise memo re same (.6); revise confirmation brief insert (3.3); research caselaw re same (2.0); communication w/ NRM re same (.3).	7.3	\$550.00	\$4,015.00
7/22/2025	JAL	Draft communication to Debtor's counsel re inserts to draft confirmation brief (.5); review and comment on draft confirmation brief (.6); review and comment on draft plan modifications (2.2).	3.3	\$1,520.00	\$5,016.00
7/22/2025	NRM	Confer w/ MEB re confirmation research (multiple) (.3); communications w/ MEB re confirmation brief (.2); communications w/ JAL and MEB re same (.1); review revisions from JAL to confirmation brief (.3); review revisions from J. Raskin re same (.2).	1.1	\$810.00	\$891.00
7/22/2025	MEB	Communicate w/ JAL, NRM, and Morgan Lewis re brief issue (.2); communication w/ NRM re ongoing business insert (.3); conferences w/ NRM re same (.3); revise ongoing business insert (3.2); research caselaw re same (1.1); communicate w/ JAL and NRM re same (.1).	5.2	\$550.00	\$2,860.00
7/23/2025	JAL	Review and revise plan documents (2.7); communications to ACM, KCM, TEP, and NRM re proposed modifications to plan, trust agreement, and TDP (.8); correspondence w/ TEP, KCM, and NRM re draft modifications to plan docs (.2); confer w/ D. Cox, J. Raskin, J. Rovira, B. Bell re comments and questions on draft of confirmation brief and next steps (1.4); correspondence w/ D. Cox, TEP, and NRM re draft confirmation brief and next steps (.4); review and analyze materials in prep for call on confirmation brief (1.1); communications w/ TEP and NRM re confirmation brief (.4); review and comments on draft confirmation brief (.4).	7.4	\$1,520.00	\$11,248.00
7/23/2025	MEB	Communication w/ TEP, JAL, NRM, and Morgan Lewis re confirmation brief (.2); review insert re same (.2); communications w/ NRM re claims issue (.5); research caselaw re same (1.6).	2.5	\$550.00	\$1,375.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/24/2025	ACM	Review proposed changes to trust agreement and TDP (.4); communicate w/ JAL re same (.1).	0.5	\$1,200.00	\$600.00
7/24/2025	JAL	Review and analyze draft confirmation brief (5.9); confer w/ T. Brown, J. Rovira, T. Long, B. Bell, J. Raskin, D. Cox, and NRM re same (.5); conferences w/ NRM re same (.4); review and analyze materials from FTI re liquidation analysis (.6).	7.4	\$1,520.00	\$11,248.00
7/24/2025	NRM	Confer w/ T. Long re confirmation brief issues (.3); conferences w/ JAL re same (.4); communications w/ MEB re same (.2); communications w/ JAL and MEB re inserts re same (.1); confer w/ JAL, D. Cox, J. Raskin, T. Brown, T. Long, J. Rovira, and B. Bell re same (.5); communications w/ B. Bell re same (.2); revise and edit confirmation brief (2.3); review voting certification (.2); communications w/ J. Raskin, D. Cox, JAL and TEP re same (.1); confer w/ K. Harrison re case status (.1).	4.4	\$810.00	\$3,564.00
7/25/2025	JAL	Review and comments on draft confirmation brief (3.6); communicate w/ NRM re next steps on confirmation brief (.1); communicate w/ NRM re confirmation hearing prep (.1).	3.8	\$1,520.00	\$5,776.00
7/25/2025	MEB	Communicate w/ NRM re confirmation brief (.1); review confirmation brief (.2).	0.3	\$550.00	\$165.00
7/27/2025	ACM	Communications w/ TEP re trust matters.	0.1	\$1,200.00	\$120.00
7/27/2025	TEP	Communications w/ ACM re trust and plan status.	0.2	\$1,455.00	\$291.00
7/28/2025	ACM	Communications w/ TEP re confirmation reply brief and case status.	0.2	\$1,200.00	\$240.00
7/28/2025	TEP	Communicate w/ ACM re plan and confirmation status (.2); communications w/ NRM re same (.1).	0.3	\$1,455.00	\$436.50
7/28/2025	TEP	Communications w/ JAL and NRM re case status.	0.2	\$1,455.00	\$291.00
7/28/2025	NRM	Communications w/ JAL and TEP re case status and next steps (.2); confer w/ MEB re trust issues (.2); communicate w/ JAL re same (.1).	0.5	\$810.00	\$405.00
7/28/2025	MEB	Confer w/ NRM re trust and related issues (.2); review confirmation brief re same (1.4); draft memo re same (.8); communicate w/ NRM re same (.2); communicate w/ NRM re best interest test research (.1).	2.7	\$550.00	\$1,485.00
7/29/2025	ACM	Review confirmation reply brief.	0.4	\$1,200.00	\$480.00
7/29/2025	NRM	Communications w/ ACM, TEP, JAL, and MEB re trust issues addressed in confirmation brief (.1); revise memorandum re same (.2).	0.3	\$810.00	\$243.00
7/30/2025	ACM	Review confirmation reply brief.	0.6	\$1,200.00	\$720.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/31/2025	JAL	Review and analyze draft objections re confirmation exhibits (1.2); review and analyze Insurers' objections to confirmation exhibits (.1).	1.3	\$1,520.00	\$1,976.00
7/31/2025	NRM	Review Debtor's objections to Insurers' preliminary confirmation exhibits (.3); communications w/ JAL re same (.1); communicate w/ TEP re same (.1); communications w/ J. Raskin, JAL, and TEP re same (.1); communications w/ Debtor's counsel and Co-Counsel re same (.1).	0.7	\$810.00	\$567.00
Total			165.40		\$168,993.00
.15 Committee Meetings/Conferences					
7/1/2025	ACM	Attend Committee meeting.	0.2	\$1,200.00	\$240.00
7/1/2025	JAL	Review draft communication to Committee.	0.1	\$1,520.00	\$152.00
7/1/2025	TEP	Prepare for Committee meeting (.4); communications w/ Committee Member re adversary proceeding issue (.1); communications w/ constituent re adversary proceeding status (.2); attend Committee meeting (.2); confer w/ Co-Chair re case status (.1).	1.0	\$1,455.00	\$1,455.00
7/1/2025	NRM	Attend Committee meeting (.2); communications w/ TEP and JAL re same (.2); communications w/ Committee Member representative re deposition (.1); communications w/ Committee re MTD and deposition notice (.1); communications w/ JAL re same (.1).	0.7	\$810.00	\$567.00
7/3/2025	TEP	Communications w/ constituents re adversary proceeding; (.5); communications w/ NRM re same (.1); confer w/ constituent re same (.2); communications w/ Co-Chairs re discovery (.2); confer w/ Co-Chair re case issue (.1); communications w/ KCM, JAL, and NRM re constituent and Committee Member inquiries (.2); conferences w/ Committee Member re case update (.4); communicate w/ KCM re same (.1).	1.8	\$1,455.00	\$2,619.00
7/3/2025	NRM	Communications w/ TEP and JAL re Committee Member inquiry re 30(b)(6) deposition (.1); research re same (.1).	0.2	\$810.00	\$162.00
7/6/2025	TEP	Communications w/ Committee Member re case status (.1); communications w/ NRM re same (.1).	0.2	\$1,455.00	\$291.00
7/6/2025	NRM	Review communications from Committee Member representative and TEP re case status (.1); communications w/ TEP, KCM, and Committee Member representative re same (.1).	0.2	\$810.00	\$162.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
7/7/2025	TEP	Communications w/ constituents re case filings (.5); communications w/ KCM, JAL, and NRM re same (.2); communications w/ Co-Chairs re meeting (.1); communicate w/ Committee re same (.1).	0.9	\$1,455.00	\$1,309.50
7/7/2025	NRM	Communications w/ TEP, KCM, and JAL re Committee meeting.	0.1	\$810.00	\$81.00
7/8/2025	JAL	Review communication to Committee (.2); communicate w/ TEP re discussion w/ Co-Chairs (.1); correspondence w/ TEP and NRM re communication to Committee (.2).	0.5	\$1,520.00	\$760.00
7/8/2025	TEP	Communications w/ constituent re adversary proceeding (.1); communications w/ JAL, JPW, KCZ, and NRM re Committee update (.3); review and edit same (.2); communications w/ Co-Chairs re same (.1); communications w/ NRM re same (.5); communicate w/ JAL re same (.1).	1.3	\$1,455.00	\$1,891.50
7/8/2025	NRM	Draft email to Committee re confirmation objections (.4); communications w/ TEP re same (.2); communications w/ JAL and TEP re same (.2); communications w/ KCZ, JPW, JAL, and TEP re same (.2); communications w/ TEP re same (.1).	1.1	\$810.00	\$891.00
7/9/2025	JAL	Correspondence w/ TEP and NRM re Committee inquiry (.2); review and comments on draft communication to Committee (.1).	0.3	\$1,520.00	\$456.00
7/9/2025	TEP	Communications w/ JAL and NRM re Committee Member inquiry (.2); communications w/ Co-Chairs re same (.1); communications w/ JAL, JPW, KCZ, and NRM re same (.2); conferences w/ Co-Chairs re case status (.2); communications w/ Co-Chairs re same (.2); communications w/ NRM re Committee update (.2).	1.1	\$1,455.00	\$1,600.50
7/9/2025	NRM	Communications w/ TEP and JAL re Committee Member inquiry (.1); research re same (.6); communications w/ KCZ, JPW, TEP, and JAL re same (.2); draft and revise email to Committee re confirmation briefing schedule (.9); communications w/ JAL, TEP, JPW, and KCZ re same (.2); email Committee re same (.1).	2.1	\$810.00	\$1,701.00
7/10/2025	JAL	Communications w/ TEP re Co-Chair inquiry.	0.3	\$1,520.00	\$456.00
7/10/2025	TEP	Confer w/ Co-Chair re case status (.1); communications w/ constituent re document issues (.2); communications w/ JAL and NRM re same (.1).	0.4	\$1,455.00	\$582.00
7/12/2025	TEP	Communications w/ constituents re case status (.2); communications w/ NRM re same (.1).	0.3	\$1,455.00	\$436.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
7/14/2025	TEP	Communications w/ JAL, NRM, and Co-Chairs re Committee meeting (.1); communicate w/ Committee re same (.1).	0.2	\$1,455.00	\$291.00
7/14/2025	NRM	Communications w/ TEP and Committee members re UST certifications.	0.3	\$810.00	\$243.00
7/15/2025	TEP	Communicate w/ Co-Chair re case status.	0.1	\$1,455.00	\$145.50
7/16/2025	TEP	Communicate w/ constituent re document inquiry.	0.1	\$1,455.00	\$145.50
7/17/2025	JAL	Review Committee communication.	0.2	\$1,520.00	\$304.00
7/17/2025	TEP	Communications w/ KCM, JAL, and NRM re Committee communication (.1); communications w/ Co-Chair re case status (.1).	0.2	\$1,455.00	\$291.00
7/17/2025	NRM	Communications w/ Committee re Liberty Mutual scheduling conference (.2); communications w/ TEP and JAL re same (.1).	0.3	\$810.00	\$243.00
7/17/2025	NRM	Confer w/ Committee Member re quarterly certifications.	0.1	\$810.00	\$81.00
7/20/2025	TEP	Communications w/ constituent re document issue (.1); communications w/ KCM, JAL, and NRM re Committee meeting (.1); communications w/ Co-Chairs re same (.1).	0.3	\$1,455.00	\$436.50
7/23/2025	JAL	Review Committee communication.	0.1	\$1,520.00	\$152.00
7/23/2025	TEP	Communications w/ JAL and NRM re Committee communication and update.	0.1	\$1,455.00	\$145.50
7/23/2025	NRM	Communications w/ Committee re confirmation brief (.1); communications w/ TEP and JAL re same (.1).	0.2	\$810.00	\$162.00
7/24/2025	TEP	Communications w/ JAL and NRM re Committee update and briefing (.3); communications w/ NRM and JAL re Committee communication (.1).	0.4	\$1,455.00	\$582.00
7/25/2025	TEP	Communicate w/ Co-Chairs re confirmation brief filing (.1); confer w/ Committee Member re same (.1).	0.2	\$1,455.00	\$291.00
7/28/2025	TEP	Communications w/ JAL, NRM, JPW, KCZ, and J. Raskin re Committee communication (.2); communications w/ Co-Chairs re Committee meeting (.1); communicate w/ Committee re same (.1).	0.4	\$1,455.00	\$582.00
7/28/2025	NRM	Draft communication to Committee re rebuttal report (.3); communications w/ TEP, JAL, JPW, and KCZ re same (.1); communications w/ D. Cox and J. Raskin re same (.1); communications w/ Committee re same (.1).	0.6	\$810.00	\$486.00
7/30/2025	JAL	Review communication to Committee tort counsel.	0.2	\$1,520.00	\$304.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
7/30/2025	TEP	Communications w/ constituent re tort case issue (.1); communications w/ JAL and NRM re same (.3); communicate w/ NRM re same (.1).	0.5	\$1,455.00	\$727.50
7/30/2025	NRM	Research re Committee Member inquiry (.3); communications w/ JAL and TEP re same (.3); communications w/ Committee Member, TEP, and JAL re same (.1); confer w/ T. Long re Committee Member inquiry [.11] (.2).	0.7	\$810.00	\$567.00
7/31/2025	TEP	Communications w/ constituent re tort case inquiry.	0.1	\$1,455.00	\$145.50
Total			18.10		\$22,138.00
.18 Fee Applications-Others					
7/3/2025	JAL	Review MLB fee statement (.3); confer w/ NRM re same (.1).	0.4	\$1,520.00	\$608.00
7/3/2025	NRM	Communications w/ JAL re Morgan Lewis monthly fee statement (.2); review same (.2); communications w/ C. DeSantis re same (.1); confer w/ JAL re same (.1); communications w/ MEB re same (.1).	0.7	\$810.00	\$567.00
7/3/2025	MEB	Review NERA fee application (.1); communicate w/ NRM re same (.1).	0.2	\$550.00	\$110.00
7/4/2025	NRM	Communications w/ C. DeSantis re Morgan Lewis fee statement.	0.1	\$810.00	\$81.00
7/7/2025	JAL	Review MLB fee statement.	0.1	\$1,520.00	\$152.00
7/7/2025	NRM	Review revised Morgan Lewis monthly fee statement (.2); communications w/ JAL and CG re same (.1); communications w/ C. DeSantis re same (.1).	0.4	\$810.00	\$324.00
7/9/2025	NRM	Communications w/ C. DeSantis re Morgan Lewis interim fee application.	0.1	\$810.00	\$81.00
7/15/2025	NRM	Communications w/ D. Cox re Morgan Lewis interim fee application (.2); communications w/ C. DeSantis re same (.3); review same (.3); communications w/ JAL, CG, and KNF re same (.1); research re procedure re same (.2); communications w/ S. Andelman re FTI fee application (.1); review NERA interim fee application (.4); communications w/ KNF re same (.1).	1.7	\$810.00	\$1,377.00
7/16/2025	NRM	Communications w/ D. Eggert and S. Plancich re NERA interim fee application (.2); communications w/ C. DeSantis re Morgan Lewis interim fee application (.3); communications w/ KNF re notice of hearing re same (.2); revise same (.2); communications w/ JAL, KNF, and CG re same (.2); communications w/ KNF re same (.3); communications w/ TEP re same (.2).	1.6	\$810.00	\$1,296.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.18 Fee Applications-Others					
7/21/2025	NRM	Communications w/ C. Tully, S. Andelman, and W. Scheff re FTI interim fee application (.1); communications w/ S. Andelman re FTI April monthly fee statement (.1); confer w/ S. Andelman re FTI fee applications (multiple) (.3); review Morgan Lewis monthly fee statement (.3); communications w/ JAL re same (.1).	0.9	\$810.00	\$729.00
7/23/2025	NRM	Communications w/ C. DeSantis re Morgan Lewis June monthly fee statement (.1); communications w/ S. Andelman re FTI monthly fee statements and interim fee application (.2); review same (.3).	0.6	\$810.00	\$486.00
7/24/2025	JAL	Review FTI 8th and 9th monthly fee statements (.5); review FTI 3rd interim fee application (.9).	1.4	\$1,520.00	\$2,128.00
Total			8.20		\$7,939.00
Total Professional Services			284.1		\$301,753.50

PERSON RECAP

Person	Title	Hours	Rate	Amount
JAL	Jeffrey A. Liesemer	96.2	\$1,520.00	\$146,224.00
KCM	Kevin C. Maclay	1.7	\$1,970.00	\$3,349.00
ACM	Ann C. McMillan	4.9	\$1,200.00	\$5,880.00
TEP	Todd E. Phillips	21.7	\$1,455.00	\$31,573.50
JPW	James P. Wehner	3.3	\$1,520.00	\$5,016.00
NRM	Nathaniel R. Miller	83.9	\$810.00	\$67,959.00
KCZ	Katy C. Zende	9.2	\$760.00	\$6,992.00
MEB	Matthew E. Beckerman	63.2	\$550.00	\$34,760.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
06/17/2025	JEFFREY A LIESEMER- Trvl Exp - Hotel- Hotel stay charges in Richmond, VA 6/17-6/18 [.16]	\$239.66
06/23/2025	JEFFREY A LIESEMER- Trvl Exp - Hotel- Hotel stay charges in Richmond, VA 6/23-6/24 [.16]	\$254.65
06/23/2025	JEFFREY A LIESEMER- Trvl Exp - Meals- Meal at hotel in Richmond, VA 6/23 [.16]	\$62.07
07/01/2025	BARRISTER DIGITAL SOLUTIONS, LLC - Outside Duplication Service - Hearing materials for NRM [.11]	\$60.21
07/02/2025	Escribers - Court Reporting - Hr'g Tr. 6/18/25 [.11]	\$21.75

DISBURSEMENTS

Date	Description of Disbursements	Amount
07/07/2025	Escribers - Court Reporting - Hr'g Tr. 6/24/25 [.11]	\$59.00
07/31/2025	Database Research - Westlaw - NRM - 07/24/2025 [.11]	\$5.20
07/31/2025	Database Research - Westlaw - JAL - 07/15-29/2025 [.11]	\$79.00
07/31/2025	Database Research - Westlaw - MEB - 07/02-24/2025 [.11]	\$551.75
07/31/2025	Database Research - Lexis - NRM - 07/03-09/2025 [.11]	\$30.58
07/31/2025	Database Research - Lexis - MEB - 07/09-22/2025 [.11]	\$31.86
	Total Disbursements	\$1,395.73
	Total Services	\$301,753.50
	Total Disbursements	\$1,395.73
	Total Current Charges	\$303,149.23

TASK RECAP

Services

<u>Category</u>	<u>Hours</u>	<u>Amount</u>
.07	4.40	\$7,097.00
.10	88.00	\$95,586.50
.11	165.40	\$168,993.00
.15	18.10	\$22,138.00
.18	8.20	\$7,939.00
	<u>284.10</u>	<u>\$301,753.50</u>

Disbursements

<u>Category</u>	<u>Amount</u>
.11	\$839.35
.16	\$556.38
	<u>\$1,395.73</u>

BREAKDOWN BY PERSON

<u>Person</u>	<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JAL Jeffrey A. Liesemer	.07	0.20	\$1,520.00	\$304.00
KCM Kevin C. Maclay	.07	1.70	\$1,970.00	\$3,349.00
TEP Todd E. Phillips	.07	2.20	\$1,455.00	\$3,201.00
NRM Nathaniel R. Miller	.07	0.30	\$810.00	\$243.00
JAL Jeffrey A. Liesemer	.10	30.60	\$1,520.00	\$46,512.00
ACM Ann C. McMillan	.10	1.50	\$1,200.00	\$1,800.00
TEP Todd E. Phillips	.10	6.10	\$1,455.00	\$8,875.50
JPW James P. Wehner	.10	3.30	\$1,520.00	\$5,016.00
NRM Nathaniel R. Miller	.10	26.80	\$810.00	\$21,708.00
KCZ Katy C. Zende	.10	4.00	\$760.00	\$3,040.00
MEB Matthew E. Beckerman	.10	15.70	\$550.00	\$8,635.00

BREAKDOWN BY PERSON

Person		Category	Hours	Rate	Amount
JAL	Jeffrey A. Liesemer	.11	61.80	\$1,520.00	\$93,936.00
ACM	Ann C. McMillan	.11	3.20	\$1,200.00	\$3,840.00
TEP	Todd E. Phillips	.11	3.80	\$1,455.00	\$5,529.00
NRM	Nathaniel R. Miller	.11	44.10	\$810.00	\$35,721.00
KCZ	Katy C. Zende	.11	5.20	\$760.00	\$3,952.00
MEB	Matthew E. Beckerman	.11	47.30	\$550.00	\$26,015.00
JAL	Jeffrey A. Liesemer	.15	1.70	\$1,520.00	\$2,584.00
ACM	Ann C. McMillan	.15	0.20	\$1,200.00	\$240.00
TEP	Todd E. Phillips	.15	9.60	\$1,455.00	\$13,968.00
NRM	Nathaniel R. Miller	.15	6.60	\$810.00	\$5,346.00
JAL	Jeffrey A. Liesemer	.18	1.90	\$1,520.00	\$2,888.00
NRM	Nathaniel R. Miller	.18	6.10	\$810.00	\$4,941.00
MEB	Matthew E. Beckerman	.18	0.20	\$550.00	\$110.00
				284.10	\$301,753.50

CAPLIN & DRYSDALE, CHARTERED

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

*Counsel for the Official
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**THIRTEENTH MONTHLY FEE STATEMENT OF
CAPLIN & DRYSDALE, CHARTERED FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM AUGUST 1, 2025, THROUGH AUGUST 31, 2025**

Name of Applicant:	Caplin & Drysdale, Chartered
Name of Client:	Official Committee of Unsecured Creditors
Date of retention order entered:	September 12, 2024, effective as of July 22, 2024 [Docket No. 202]
Time Period Covered:	August 1, 2025, through August 31, 2025
Total Fees Requested:	<u>\$325,528.00</u>
Total Expenses Requested:	<u>\$16,063.25</u>
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 Caplin & Drysdale, Chartered (“**Caplin**”), as counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in this chapter 11 case, hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) seeking interim payment of (i) \$260,422.40 (80% of \$325,528.00) as compensation for professional services rendered to the Committee and (ii) \$16,063.25 for reimbursement of actual and necessary expenses, for a total of \$276,485.65 for the period from August 1, 2025, through August 31, 2025 (the “**Fee Period**”).

ITEMIZATION OF SERVICES RENDERED AND DISBURSEMENTS INCURRED

1. In support of this Monthly Fee Statement, Caplin 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 providing certain information regarding the Caplin attorneys and paraprofessionals for whose work on this chapter 11 case compensation is sought in this Monthly Fee Statement.
 - **Exhibit C** is a summary of the expenses incurred by Caplin during the Fee Period.
 - **Exhibit D** consists of Caplin’s detailed records of fees incurred during the Fee Period, including the number of hours expended (on an aggregate basis) by Caplin members, of counsel, associates, 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. Caplin 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, Caplin respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$276,485.65, consisting of (i) \$260,422.40, which is 80% of the fees incurred for reasonable and necessary professional services rendered by Caplin during the Fee Period, and (ii) \$16,063.25 for actual and necessary costs and expenses.

Dated: September 24, 2025

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)

Todd E. Phillips (admitted *pro hac vice*)

Jeffrey A. Liesemer (VSB No. 35918)

Nathaniel R. Miller (admitted *pro hac vice*)

CAPLIN & DRYSDALE, CHARTERED

1200 New Hampshire Avenue NW, 8th Floor

Washington, DC 20036

Telephone: (202) 862-5000

Facsimile: (202) 429-3301

kmaclay@capdale.com

tphillips@capdale.com

jliesemer@capdale.com

nmiller@capdale.com

Counsel for the Official

Committee of Unsecured Creditors

EXHIBIT A

SUMMARY OF FEES BY PROJECT CATEGORY

AUGUST 1, 2025, THROUGH AUGUST 31, 2025

PROJECT CATEGORY	HOURS	FEES
(.02) Asset Disposition	0.0	\$0.00
(.03) Business Operations	0.0	\$0.00
(.04) Case Administration & Calendar Control	0.0	\$0.00
(.05) Claims Administration & Objections	0.0	\$0.00
(.06) Employee Benefits/Pensions	0.0	\$0.00
(.07) Fee Applications - Self	5.3	\$6,609.00
(.08) Objections - Fee/Retention Applications	0.0	\$0.00
(.09) Financing	0.0	\$0.00
(.10) Litigation	145.4	\$142,917.00
(.11) Plan & Disclosure Statement	118.2	\$146,675.00
(.12) Relief from Stay Proceedings	0.0	\$0.00
(.13) Tax Issues	0.0	\$0.00
(.15) Committee Meetings/Conferences	18.5	\$23,346.50
(.16) Travel	6.2	\$4,002.00
(.17) Docket Review & File Maintenance	0.0	\$0.00
(.18) Fee Applications - Others	2.1	\$1,978.50
(.19) Retention Applications - Others	0.0	\$0.00
(.20) Retention Applications - Self	0.0	\$0.00
TOTAL	295.7	\$325,528.00

EXHIBIT B

SUMMARY OF FEES BY PROFESSIONAL²

AUGUST 1, 2025, THROUGH AUGUST 31, 2025

COMPENSATION BY PROFESSIONAL				
NAME OF PROFESSIONAL	POSITION / ADMISSION YEAR / DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS	TOTAL COMPENSATION
Ann C. McMillan	Member / 1984 / Bankruptcy	\$1,200	6.6	\$7,920.00
Kevin C. Maclay	Member / 1994 / Bankruptcy	\$1,970	3.1	\$6,107.00
Todd E. Phillips	Member / 2005 / Bankruptcy	\$1,455	22.9	\$33,319.50
Jeffrey A. Liesemer	Member / 1993 / Bankruptcy	\$760	4.2	\$3,192.00
Jeffrey A. Liesemer	Member / 1993 / Bankruptcy	\$1,520	109.9	\$167,048.00
James P. Wehner	Member / 1995 / Bankruptcy	\$1,520	1.0	\$1,520.00
Nathaniel R. Miller	Of Counsel / 2016 / Bankruptcy	\$405	2.0	\$810.00
Nathaniel R. Miller	Of Counsel / 2016 / Bankruptcy	\$810	97.4	\$78,894.00
Matthew E. Beckerman	Associate / 2022 / Bankruptcy	\$550	48.1	\$26,455.00
TOTAL			295.2	\$325,265.50

COMPENSATION BY PARAPROFESSIONAL				
NAME OF PROFESSIONAL	POSITION / ADMISSION DATE / DEPARTMENT	HOURLY BILLING RATE	TOTAL HOURS	TOTAL COMPENSATION
Rachael L. Davis	Paralegal / N/A / Bankruptcy	\$525	0.5	\$262.50
TOTAL			0.5	\$262.50

² Nonworking travel time is billed at one-half of the professional's usual hourly rate.

EXHIBIT C

SUMMARY OF EXPENSES INCURRED DURING THE FEE PERIOD

EXPENSE CATEGORY	AMOUNT
Court Reporter Transcript Services	\$4,285.95
Database Research	\$1,536.36
PACER Service	\$246.30
Photocopies	\$229.86
Travel	\$9,764.78
TOTAL	\$16,063.25

EXHIBIT D

CAPLIN & DRYSDALE

1200 New Hampshire Avenue NW 8th Floor
Washington, DC 20036

Telephone: (202) 862-5000

Federal Tax I.D. No.: 52-1226629

www.capdale.com

Fax: (202) 429-3301

Official Committee of Unsecured Creditors of Hopeman Brothers, Inc.

Invoice #: 363383

Page: 1

RE: Hopeman Brothers, Inc. bankruptcy

For Professional Services Rendered Through August 31, 2025

Total Services	\$325,528.00
Total Disbursements	\$16,063.25
Total Current Charges	\$341,591.25

Remittance Advice

[Payment is due upon receipt. If you should have any questions, please email accounting@capdale.com.](mailto:accounting@capdale.com)

Check Payable To:

Caplin & Drysdale, Chartered
Attn: Accounts Receivable
1200 New Hampshire Avenue NW 8th Floor
Washington, DC 20036

Wire Transfer:

Receiving Bank: Bank of America
ABA Wire Routing Number: 026009593
ABA ACH Routing Number: 054001204
Swift Code: BOFAUS3N
Beneficiary: Caplin & Drysdale, Chartered
Account Number: 001920814809

Credit Card:

We accept all major card companies. A service fee of 2.4% for Corporate Cards and 2.95% for Individual Cards will be added to all payments.

Please return this remittance page with your payment. Thank you.

CAPLIN & DRYSDALE

1200 New Hampshire Avenue NW 8th Floor
Washington, DC 20036

Telephone: (202) 862-5000

Federal Tax I.D. No.: 52-1226629

www.capdale.com

Fax: (202) 429-3301

Official Committee of Unsecured Creditors of Hopeman Brothers, Inc.

September 24, 2025

Invoice #: 363383

Page: 1

RE: Hopeman Brothers, Inc. bankruptcy

For Professional Services Rendered Through August 31, 2025

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.07 Fee Applications-Self					
8/1/2025	TEP	Communications w/ KNF re monthly fee application (.1); review same (.1).	0.2	\$1,455.00	\$291.00
8/7/2025	TEP	Review UST inquiry on expenses and communications w/ RLD re same.	0.2	\$1,455.00	\$291.00
8/7/2025	NRM	Communicate w/ RLD re interim fee application inquiries from US Trustee.	0.1	\$810.00	\$81.00
8/8/2025	TEP	Communications w/ JAG and KCM re monthly fee application.	0.1	\$1,455.00	\$145.50
8/11/2025	JAL	Review and analyze proposed responses to UST questions and comments (.3); communicate w/ NRM re same (.1).	0.4	\$1,520.00	\$608.00
8/11/2025	TEP	Communications w/ JAL re UST comments re fee application.	0.1	\$1,455.00	\$145.50
8/11/2025	NRM	Research re proposed responses to UST questions and comments re interim fee application (.4); draft response re same (.3); communications w/ JAL, TEP, CG, and RLD re same (.1).	0.8	\$810.00	\$648.00
8/12/2025	NRM	Communications w/ JAL, TEP, and KCM re UST inquiry.	0.2	\$810.00	\$162.00
8/13/2025	JAL	Teleconference w/ B. King re UST comments (.1); communicate w/ B. King re same (.1); correspond w/ KCM, TEP, and NRM re same (.2); confer w/ NRM re same (.1).	0.5	\$1,520.00	\$760.00
8/13/2025	NRM	Confer w/ JAL re UST comments on interim fee application (.1); communications w/ B. King, K. Montgomery, and JAL re same (.1).	0.2	\$810.00	\$162.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.07 Fee Applications-Self					
8/14/2025	TEP	Review UST communications re fee and expense issues (.1); communications w/ CG and JAG re same (.1).	0.2	\$1,455.00	\$291.00
8/17/2025	NRM	Revise certificate of no objection and revise proposed order for interim fee application (.3); communications w/ JAL, CG, and MEB re same (.1).	0.4	\$810.00	\$324.00
8/18/2025	TEP	Prepare and edit monthly fee application (.4); communications w/ JAG re same (.4).	0.8	\$1,455.00	\$1,164.00
8/19/2025	TEP	Communications w/ NRM re outstanding fee applications.	0.1	\$1,455.00	\$145.50
8/28/2025	NRM	Communicate w/ TEP re interim fee applications.	0.1	\$810.00	\$81.00
8/29/2025	TEP	Review and edit monthly fee application (.2); communications w/ NRM re fee issue (.1).	0.3	\$1,455.00	\$436.50
8/30/2025	TEP	Review and edit monthly fee application.	0.6	\$1,455.00	\$873.00
Total			5.30		\$6,609.00
.10 Litigation					
8/1/2025	NRM	Communications w/ MEB re research re FCR appellee brief (.1); confer w/ T. Long re same (.2); communications w/ T. Long re same (.1); communications w/ MEB re motion to dismiss research (.2); communications w/ TEP and JAL re Liberty adversary proceeding (.3); confer w/ T. Long re same (.2).	1.1	\$810.00	\$891.00
8/3/2025	TEP	Confer w/ NRM re case status and upcoming deadlines.	0.1	\$1,455.00	\$145.50
8/3/2025	NRM	Communications w/ TEP and JAL re case status (.3); confer w/ TEP re same (.1).	0.4	\$810.00	\$324.00
8/4/2025	JAL	Review and comments on markup of motion to dismiss appeal (.2); correspond w/ J. Raskin re upcoming hearings (.5).	0.7	\$1,520.00	\$1,064.00
8/4/2025	NRM	Communicate w/ MEB re standing issues in FCR appeal (.1); review and revise memorandum re same (.7); communications w/ MEB re same (.2); revise appellee brief in FCR appeal (.6); research re same (.2).	1.8	\$810.00	\$1,458.00
8/5/2025	TEP	Communications w/ NRM re adversary proceeding status.	0.1	\$1,455.00	\$145.50
8/5/2025	NRM	Research re FCR appellee brief (1.3); revise same (.8); communications w/ TEP, KCM, and JAL re Liberty Mutual adversary proceeding (.1).	2.2	\$810.00	\$1,782.00
8/6/2025	JAL	Correspond w/ TEP and NRM re status of pending matters and next steps (.2); correspond w/ NRM re developments and next steps (.1); correspond w/ T. Long re meet and confer (.1).	0.4	\$1,520.00	\$608.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
8/6/2025	MEB	Review Chubb appendix (.4); research and analyze case law re same (.6); communicate w/ JAG and RLD re same (.1); communicate w/ NRM re same (.2); research case law re FCR appeal issues (1.8); review and revise portions brief re same (1.9); communication w/ NRM re same (.3).	5.3	\$550.00	\$2,915.00
8/7/2025	NRM	Confer w/ T. Long re Liberty Mutual adversary proceeding (multiple) (.3); communications w/ MEB re FCR appellee brief (.2); research procedural issues re same (.2); communications w/ JAL and MEB re same (.1); confer w/ MEB re same (.1); review communications from defendants re stay issues (.1); review correspondence from MEB re appellee appendix (.1); review Liberty motion to stay (.3); research re same (.4); confer w/ MEB re same (.2); communications w/ MEB re same (.1); confer w/ B. Bell re supplemental brief (.2); research re same (.4); draft memorandum re recent filings (.3); research re same (.2); communications w/ TEP, JAL, and KCM re same (.1); communications w/ TEP and JAL re same (.1).	3.4	\$810.00	\$2,754.00
8/7/2025	MEB	Communicate w/ JAL and NRM re appellee brief (.1); review appellee brief (.3); communication w/ NRM re same (.3); confer w/ NRM re same (.1); revise appellee brief (.1); review filings re supplemental appendix (.3); draft memo re supplemental appendix (.3); confer w/ NRM re Liberty motion to stay (.2); review motion to stay (.2); draft memo re same (.9).	2.8	\$550.00	\$1,540.00
8/8/2025	JAL	Review Liberty's communication re scheduling conference, and correspondence to TEP and NRM re same (.2); review and revise appellees' brief in FCR appeal (2.9).	3.1	\$1,520.00	\$4,712.00
8/8/2025	TEP	Communications w/ JAL and NRM re insurer and Debtor MTD communications (.2); communications w/ JAL and NRM re Debtor filings (.1).	0.3	\$1,455.00	\$436.50
8/8/2025	NRM	Communications w/ JAL, TEP, and KCM re FCR appeal issues (.1); confer w/ MEB re objection to Liberty Mutual motion to stay (multiple) (.3); revise same (.6); communications w/ MEB re same (.1); communications w/ JAL and TEP re Liberty Mutual adversary proceeding initial disclosures (.1).	1.2	\$810.00	\$972.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
8/8/2025	MEB	Conferences w/ NRM re motion to stay memo (.3); research case law re motion to stay (.6); draft memo re same (.6); communicate w/ NRM re same (.1); communicate w/ JAL, NRM, and Morgan Lewis re objection to stay motion (.1); draft objection to motion to stay (2.7); research case law re same (1.3); communication w/ NRM re same (.2); review Debtor's motion to withdraw (.3).	6.2	\$550.00	\$3,410.00
8/10/2025	JAL	Review and revise draft appellee brief for FCR appeal.	2.7	\$1,520.00	\$4,104.00
8/10/2025	NRM	Revise objection to motion to stay Liberty Mutual adversary proceeding (1.4); research re same (.3); confer w/ MEB re same (.2); communicate w/ JAL and MEB re same (.1); revise FCR appellee brief (.7); communications w/ JAL and MEB re same (.1).	2.8	\$810.00	\$2,268.00
8/10/2025	MEB	Confer w/ NRM re objection to motion to stay (.2); revise objection to motion to stay (.8); communicate w/ JAL and NRM re same (.1).	1.1	\$550.00	\$605.00
8/11/2025	JAL	Review and edit draft appellee brief in FCR appeal (2.9); attend meet and confer (.8); prepare re same (.3); teleconference w/ T. Long re hearing issues and next steps (.2); review and analyze draft objection to Liberty motion to stay (1.2); review and comments on revised appellee brief (.7).	6.1	\$1,520.00	\$9,272.00
8/12/2025	JAL	Confer w/ NRM re adversary proceeding and plan briefing (.9); review and comments on draft supplemental brief (1.1); communications w/ T. Long, J. Rovira, and T. Brown re same (.3); teleconference w/ NRM re draft appellee brief in FCR appeal (.1); review revised FCR appellee brief (.3).	2.7	\$1,520.00	\$4,104.00
8/12/2025	NRM	Confer w/ MEB re FCR appellee brief, objection to motion to stay, and supplemental confirmation brief (.3); teleconference w/ JAL re same (.1); revise insert re same (.6); communications w/ MEB re same (.1); communications w/ JAL, MEB, and CG re appellee brief (.2); communications w/ D. Cox, J. Raskin, JAL, TEP, and MEB re same (.2); communications w/ TEP, JAL, MEB, and CG re same (.1); research re same (1.2); communications w/ JAL, TEP, and KCM re same (.2); communications w/ T. Brown, T. Long, J. Rovira, B. Bell, JAL, TEP, D. Cox, and J. Raskin re same (.2); revise objection to motion to stay (1.8); research re same (.8); communications w/ JAL and MEB re same (.2); confer w/ JAL re Liberty adversary proceeding and plan briefing (.9).	6.9	\$810.00	\$5,589.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
8/12/2025	MEB	Research case law re motion to dismiss issues (.8); draft objection to Liberty motion to stay (2.4); confer w/ NRM re same (.3); communicate w/ NRM and CG re FCR brief (.2); draft insert re same (.8); communicate w/ JAL and NRM re same (.1); review Chubb motion for extension of time to file response to motion to dismiss (.1); review Morgan Lewis edits to FCR appeal draft (.2); communication w/ NRM re same (.2).	5.1	\$550.00	\$2,805.00
8/13/2025	JAL	Attend hearing and status conference (1.8); correspond w/ J. Raskin, D. Cox, and NRM re Liberty adversary proceeding and next steps (.5); correspond w/ J. Raskin and NRM re upcoming hearing (.2); review objection to Liberty motion to stay (.2); review markup of FCR appellee brief (.2); confer w/ NRM re Liberty adversary proceeding and next steps (.4); review and revise objection to Liberty motion to stay (2.8).	6.1	\$1,520.00	\$9,272.00
8/13/2025	KCM	Review/edit appeal brief.	0.8	\$1,970.00	\$1,576.00
8/13/2025	KCM	Teleconferences w/ NRM re appeal brief.	0.7	\$1,970.00	\$1,379.00
8/13/2025	TEP	Review T. Brown communication re FCR appeal brief and communications w/ KCM re same (.1); confer w/ NRM re next steps (.1).	0.2	\$1,455.00	\$291.00
8/13/2025	NRM	Attend hearing and status conference (1.8); confer w/ JAL re Liberty adversary proceeding (.4); confer w/ KCM re FCR appellee brief (.7); revise same (1.8); confer w/ J. Raskin re Liberty Mutual adversary proceeding (.2); communications w/ J. Raskin, D. Cox, and JAL re same (.1); communications w/ D. Cox re FCR appellee brief (.1); confer w/ TEP re same (.1); communications w/ CG re same (.2); communications w/ JAL, TEP, KCM, and CG re same (.1).	5.5	\$810.00	\$4,455.00
8/13/2025	MEB	Review objection to Liberty motion to stay (.1); communications w/ NRM re same (.2); research caselaw re same (.6); draft memo re same (.2); communicate w/ CG re Liberty reply in support of motion to dismiss and FCR appeal brief (.1); communicate w/ TEP, JAL, NRM, and Morgan Lewis re same (.2).	1.4	\$550.00	\$770.00
8/14/2025	JAL	Review and comments on revised FCR appellee brief (.4); review and comments on revised draft supplemental brief (1.7); review and revise objection to motion to stay (1.6); correspond w/ NRM and D. Cox re developments and next steps (.1).	3.8	\$1,520.00	\$5,776.00
8/14/2025	KCM	Teleconference w/ TEP re case strategy and appellate issues.	0.8	\$1,970.00	\$1,576.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
8/14/2025	TEP	Confer w/ KCM re FCR appeal brief and related case strategy issues (.8); communicate w/ NRM re same (.1); review revisions re same (.2).	1.1	\$1,455.00	\$1,600.50
8/14/2025	MEB	Communicate w/ NRM re Liberty objection to MTD (.1); communication w/ JAL, NRM and Morgan Lewis re same (.2); review Liberty objection (.3); revise objection to motion to stay (.2); communicate w/ JAL and NRM re same (.2); research caselaw re same (.4).	1.4	\$550.00	\$770.00
8/15/2025	JAL	Review and analyze draft declarations for confirmation hearing (.9); review and revise same (.6); teleconference w/ D. Cox, C. Tully, W. Scheff, S. Andelman, and NRM re same (.4); review and comments on revised draft supplemental brief (.6); teleconference w/ NRM re status and next steps (.1); teleconference w/ NRM re FCR appellee brief (.1); review and analyze draft FCR appellee brief and appendix (1.2).	3.9	\$1,520.00	\$5,928.00
8/15/2025	NRM	Confer w/ JAL, D. Cox, C. Tully, S. Andelman, and W. Scheff re declaration and case status (.4); confer w/ JAL re FCR appellee brief (.1); revise same (2.1); communications w/ CG re same (.2); communications w/ MEB re same (.2); communications w/ MEB re appendix to FCR brief (.1); revise same (.6); communications w/ CG and MEB re same (.1); confer w/ T. Long re same (.2); confer w/ MEB re same (multiple) (.4); communications w/ JAL, CG, and MEB re same (.3); confer w/ JAL re status and next steps (.1).	4.8	\$810.00	\$3,888.00
8/15/2025	MEB	Review FCR appeal brief (.9); communicate w/ NRM re same (.1); confer w/ NRM re FCR appeal brief (.4) (multiple); review appellee appendix (.8); review Chubb appendix (.5); communications w/ NRM re same (.2).	2.9	\$550.00	\$1,595.00
8/15/2025	RLD	Communicate w/ JAL re motion to dismiss and related materials (.1); review and organize materials re same (.3); communicate w/ vendor re same (.1).	0.5	\$525.00	\$262.50
8/16/2025	JAL	Review and comments on markups of supplemental brief.	0.3	\$1,520.00	\$456.00
8/17/2025	NRM	Review Debtor's motion in limine (.3); review correspondence from C. Tully re same (.1); review revisions to supplemental brief (.3).	0.7	\$810.00	\$567.00
8/18/2025	MEB	Communicate w/ NRM re review objection to motion to stay (.2); review objection to motion to stay (.7); communicate w/ JAL, NRM, and CG re same (.2); communication w/ TEP, JAL, and NRM re reply in support of motion to dismiss (.2); communicate w/ NRM re same (.3); revise reply in support (1.6).	3.2	\$550.00	\$1,760.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
8/19/2025	JAL	Correspond w/ J. Raskin, NRM, and MEB re comments on draft reply brief (.2); teleconference w/ TEP and NRM re same (partial) (.1); confer w/ TEP, J. Raskin (partial), and NRM re same (.2); conferences w/ NRM re same (.2); review draft witness and exhibit list (.1); review revised draft reply brief re motion to dismiss (.2); review and analyze objecting insurers' witness and exhibits lists (.7); communications w/ KCM, TEP, NRM, D. Cox, and J. Raskin re evidentiary issues (.1).	1.8	\$1,520.00	\$2,736.00
8/19/2025	TEP	Confer w/ NRM re reply in support of motion to dismiss (.1); confer w/ JAL (partial) and NRM re same (.3); confer w/ JAL, J. Raskin (partial), and NRM re next steps (.2); review communications re exhibits and related issues (.3).	0.9	\$1,455.00	\$1,309.50
8/19/2025	NRM	Revise reply in support of motion to dismiss Liberty complaint (1.8); confer w/ TEP re same (.1); communications w/ JAL, TEP, MEB, and CG re same (.2); confer w/ MEB re same (multiple) (.4); research re same (2.8); confer w/ JAL, J. Raskin (partial), and TEP re next steps (.2); confer w/ JAL re same (multiple) (.2); confer w/ TEP and JAL (partial) re case status and next steps (.3); communications w/ JAL and MEB re same (.2); review communications from J. Raskin re same (.1); confer w/ J. Raskin re same (.1); communicate w/ CG re same (.1).	6.5	\$810.00	\$5,265.00
8/19/2025	MEB	Draft reply in support of motion to dismiss (.7); communication w/ JAL and NRM re tort system research (.2); confer w/ NRM re same (multiple) (.4); research caselaw re same (1.6); draft insert re same (1.4); communicate w/ TEP, JAL, NRM, and CG re same (.1); review district court order setting schedule for motion to withdraw reference (.1); draft memo re same (.3); communicate w/ JAL and NRM re Morgan Lewis comments (.1); research case law re tort system issues (.4); draft oral argument outline re same (1.3); communicate w/ JAL and NRM re oral argument outline (.1); draft oral argument outline re motion to withdraw (1.3); review Liberty reply re same (.4).	8.4	\$550.00	\$4,620.00
8/20/2025	JAL	Review and analyze materials in prep for meet and confer (.3); review revised reply brief re motion to dismiss (.2); attend meet and confer (.9); review and comments on revised draft plan and related materials (.6); teleconference w/ T. Long and NRM re developments and next steps (.5); hearing prep (.6); confer w/ NRM re potential motion and next steps (.2); review and revise oral argument outline (1.5).	4.8	\$1,520.00	\$7,296.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
8/20/2025	NRM	Communications w/ CG and MEB re reply in support of motion to dismiss (.2); communications w/ JAL, MEB, and CG re same (.2); communications w/ TEP re same (.1); edit reply in support of motion to dismiss Liberty adversary proceeding (.4); confer w/ MEB re same (.1); confer w/ T. Long re case status (.1); attend meet and confer (.9); confer w/ T. Long and JAL re next steps (.5); confer w/ JAL re potential motion and next steps (.2); communications w/ TEP, JAL, KCM, and JPW re Chubb issue (.1); review insurers' proposed exhibits (.6); communications w/ D. Cox, JAL, and J. Raskin re same (.1); communications w/ D. Cox and JAL re hearing prep (.1); communications w/ S. Andelman re same (.1); revise oral argument outline for motion to dismiss (1.3); communications w/ JAL and MEB re same (.1); communications w/ Debtor re same (.1); confer w/ J. Raskin re Liberty adversary proceeding issues (.6); communications w/ D. Cox, J. Raskin, and JAL re district court order re withdrawal of reference (.1).	5.9	\$810.00	\$4,779.00
8/20/2025	MEB	Draft oral argument outline re motion to withdraw (1.3); research case law re same (1.4); communications w/ NRM re same (.3); confer w/ NRM re same (.1); review reply in support of motion to dismiss Liberty adversary proceeding (.5); communications w/ NRM and CG re same (.2); communicate w/ NRM re motion to dismiss oral argument outline (.1); research caselaw re same (.8); draft oral argument outline re same (.7); communication w/ NRM re same (.2).	5.6	\$550.00	\$3,080.00
8/21/2025	JAL	Draft oral argument outlines in prep for hearing (.9); attend hearing (4.1); teleconference w/ TEP and NRM re next steps (.1).	5.1	\$1,520.00	\$7,752.00
8/21/2025	TEP	Communications w/ NRM re hearing (.2); confer w/ NRM and JAL re same (.1); review D. Cox communication and communications w/ JAL and NRM re same (.2).	0.5	\$1,455.00	\$727.50
8/21/2025	NRM	Attend hearing (4.1); communications w/ D. Cox re same (.1); confer w/ TEP and JAL re same (.1).	4.3	\$810.00	\$3,483.00
8/22/2025	JAL	Correspond w/ D. Cox, NRM, and JPW re draft communication to Chubb counsel.	0.4	\$1,520.00	\$608.00
8/22/2025	JPW	Review Scarcella ruling (.4); teleconference NRM re response to Chubb (.1); review draft Debtor communication re same (.2).	0.7	\$1,520.00	\$1,064.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.10 Litigation					
8/22/2025	NRM	Confer w/ J. Rovira re response to Chubb re briefing (.1); review same (.2); communications w/ TEP, JAL, and JPW re same (.1); teleconference w/ JPW re same (.1); confer w/ D. Cox re same (.1); communications w/ JAL, D. Cox, and J. Raskin re same (.1).	0.7	\$810.00	\$567.00
8/28/2025	JAL	Review correspondence from D. Cox re proposed Liberty language (.4); correspond w/ D. Cox, J. Raskin, and NRM re same (.3); draft and revise potential counterproposal re same (.8); correspond w/ J. Raskin, D. Cox, and NRM re strategy and next steps (.2).	1.7	\$1,520.00	\$2,584.00
8/28/2025	MEB	Communicate w/ NRM re Chubb FCR appeal reply brief.	0.1	\$550.00	\$55.00
8/29/2025	JAL	Communications w/ KCM, TEP, NRM, D. Cox, and J. Raskin re report and recommendation.	0.9	\$1,520.00	\$1,368.00
8/29/2025	TEP	Communications w/ KCM, JAL, and NRM re R&R re adversary proceeding.	0.1	\$1,455.00	\$145.50
8/29/2025	NRM	Confer w/ MEB re report recommending withdrawal of reference (.1); review same (.2); draft memorandum re filings (.4); communications w/ TEP and JAL re same (.2).	0.9	\$810.00	\$729.00
8/29/2025	MEB	Review report recommending withdrawal of reference (.3); communicate w/ NRM re same (.1); confer w/ NRM re same (.1); draft memo re report (.4).	0.9	\$550.00	\$495.00
8/30/2025	JAL	Correspond w/ D. Cox re status and next steps.	0.1	\$1,520.00	\$152.00
8/30/2025	MEB	Communicate w/ NRM re Chubb reply brief (.1); review Chubb reply brief (.2); draft memo re same (.2).	0.5	\$550.00	\$275.00
Total			145.40		\$142,917.00
.11 Plan & Disclosure Statement					
8/4/2025	NRM	Confer w/ T. Long re plan issues (.1); communications w/ TEP and JAL re same (.1).	0.2	\$810.00	\$162.00
8/6/2025	TEP	Communications w/ JAL and NRM re plan-related revisions and next steps.	0.1	\$1,455.00	\$145.50
8/8/2025	ACM	Teleconferences w/ TEP re potential trust counsel (.2); exchange emails re same (.1); teleconference w/ TEP and potential trust counsel re case issues (.4).	0.7	\$1,200.00	\$840.00
8/8/2025	TEP	Confer w/ ACM and potential Trust counsel re case issues (.4); conferences w/ ACM re same (.2).	0.6	\$1,455.00	\$873.00
8/8/2025	NRM	Communications w/ ACM and TEP re trust issues (.1); research re same (.2).	0.3	\$810.00	\$243.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
8/11/2025	MEB	Review correspondence w/ B. Bell re supplemental confirmation brief (.1); review supplemental confirmation brief (.1).	0.2	\$550.00	\$110.00
8/12/2025	JAL	Review and revise proposed confirmation order (2.1); communications w/ J. Raskin and D. Cox re draft plan modifications (.4); teleconference w/ KCM re plan issues and strategy (.2); review draft plan revisions (.7); communicate w/ J. Raskin and D. Cox re potential plan exhibit (.1).	3.5	\$1,520.00	\$5,320.00
8/12/2025	KCM	Teleconference w/ JAL re case status and plan issues and strategy.	0.2	\$1,970.00	\$394.00
8/13/2025	ACM	Communications w/ TEP re Trust matter (.2); communications w/ Trustee nominees re same (.2).	0.4	\$1,200.00	\$480.00
8/13/2025	JAL	Review and comments re revisions to proposed confirmation order (.8); review and revise same (.4); communicate w/ J. Raskin and D. Cox re draft confirmation order (.2); communications w/ TEP and NRM re same (.2); communications w/ T. Brown, T. Long, J. Rovira, and B. Bell re next steps (.3); conferences w/ NRM re plan confirmation issues (.5); correspond w/ J. Raskin and D. Cox re comments on draft plan modifications (.2); correspond w/ J. Raskin re same (.2); communications w/ TEP and NRM re draft proposed confirmation order and next steps (.1).	2.9	\$1,520.00	\$4,408.00
8/13/2025	TEP	Communications w/ NRM re plan issues (.1); confer w/ NRM re same (.1); communications w/ ACM re Trust issues (.1); review ACM communications re Trust issues (.2).	0.5	\$1,455.00	\$727.50
8/13/2025	NRM	Confer w/ T. Long re confirmation order (.1); conferences w/ JAL re same (.5); confer w/ TEP re same (.1).	0.7	\$810.00	\$567.00
8/14/2025	ACM	Communication w/ TEP re prospective Trustee (.1); teleconference w/ TEP and prospective Trustee re trust issues (.4); teleconference w/ TEP re same (.1); exchange emails w/ Trustee nominee (.1); teleconference w/ potential Trust counsel (.1).	0.8	\$1,200.00	\$960.00
8/14/2025	JAL	Review and analyze materials in prep for call w/ Debtor (.6); teleconference w/ T. Brown, J. Rovira, T. Long, B. Bell, D. Cox, and J. Raskin re plan issue (.9); review and analyze materials from NRM re draft plan and confirmation briefing (.8); review draft declarations for confirmation hearing (.2).	2.5	\$1,520.00	\$3,800.00
8/14/2025	TEP	Confer w/ ACM and prospective Trustee re case status and next steps (.4); confer w/ ACM re same (.1).	0.5	\$1,455.00	\$727.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
8/14/2025	NRM	Communications w/ Debtor's counsel re draft retained causes of action plan exhibit.	0.1	\$810.00	\$81.00
8/14/2025	MEB	Communicate w/ JAL, NRM, and Morgan Lewis re supplemental confirmation briefing.	0.1	\$550.00	\$55.00
8/15/2025	ACM	Review emails re updated Plan documents (.1); communicate w/ JAL re TDP and Trust agreement (.1); prepare materials for prospective Trustee re same (.5).	0.7	\$1,200.00	\$840.00
8/15/2025	JAL	Review and revise proposed Plan documents (1.6); communications w/ Debtor's counsel re revised trust agreement and TDP (.3); communications w/ KCM, ACM, TEP, and NRM re same (.3); review correspondence from TEP, KCM, and NRM re plan issues (.2); review revised draft plan (.4); review and comments on draft findings and conclusions (1.0).	3.8	\$1,520.00	\$5,776.00
8/15/2025	NRM	Communications w/ D. Salzman, K. Harrison, and JAL re retained causes of action schedule to plan (.1); communications w/ TEP, JAL, and KCM re plan issues (.1); research re same (.2).	0.4	\$810.00	\$324.00
8/16/2025	ACM	Exchange emails w/ prospective Trustees and TEP re Trust issues.	0.1	\$1,200.00	\$120.00
8/17/2025	ACM	Exchange emails re meeting w/ prospective Trustees.	0.1	\$1,200.00	\$120.00
8/17/2025	JAL	Review and edits to proposed findings and conclusions.	1.3	\$1,520.00	\$1,976.00
8/17/2025	TEP	Review ACM communications re Trust issues.	0.2	\$1,455.00	\$291.00
8/18/2025	ACM	Exchange emails w/ TEP and prospective Trustees (.1); review TDP (.1); exchange emails w/ JAL and TEP re plan issue (.2).	0.4	\$1,200.00	\$480.00
8/18/2025	JAL	Review and edit proposed findings and conclusions (2.7); review and analyze requested Plan modifications (.9); review and revise Plan (1.5); review and analyze materials in prep for upcoming hearing (.5); communicate w/ NRM re requested Plan modifications (.1); review and analyze draft declarations for confirmation hearing (1.4).	7.1	\$1,520.00	\$10,792.00
8/18/2025	TEP	Communications w/ JAL, ACM, and NRM re plan issues (.1); review JAL communications re same (.2).	0.3	\$1,455.00	\$436.50
8/19/2025	JAL	Review and revise draft communication to Debtor's counsel re plan issue.	0.2	\$1,520.00	\$304.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
8/19/2025	NRM	Communications w/ JAL re proposed revisions to plan (.2); research re same (.4); communications w/ JAL, D. Cox, J. Raskin, and TEP re confirmation hearing issues (.1); communications w/ T. Long re exhibit and witness list (.1); communications w/ Debtor re confirmation hearing prep (.1).	0.9	\$810.00	\$729.00
8/20/2025	ACM	Review files re TDP revisions (.3); review Trust Agreement and proposed modifications to Plan (.2); exchange emails w/ JAL re same (.2); review mark-ups of Plan documents (.4); teleconferences w/ TEP re Trust and Trustee issues (.2); confer w/ TEP and prospective Trustees re next steps (.7).	2.0	\$1,200.00	\$2,400.00
8/20/2025	JAL	Review and edit draft Plan (1.4); review revised plan exhibit and filing notice (.2); conferences w/ NRM re plan revisions (.5); correspond w/ TEP, NRM, and KCM re plan issue and next steps (.2).	2.3	\$1,520.00	\$3,496.00
8/20/2025	JPW	Review correspondence w/ insurer and Debtor re plan issues.	0.3	\$1,520.00	\$456.00
8/20/2025	TEP	Conferences w/ ACM re Trust and Trustee issues (.2); confer w/ ACM and prospective Trustees re next steps (.7); review insurer communication and communications w/ JAL and NRM re same (.2); review D. Cox and T. Brown communications re same (.1); communications w/ D. Cox re plan edits and communications w/ JAL and NRM re same (.2); review revisions to plan and plan-related documents (.4); communications w/ NRM re same (.2).	2.0	\$1,455.00	\$2,910.00
8/20/2025	NRM	Communications w/ JAL and TEP re plan revisions (.1); review communications from ACM re TDP revisions (.1); confer w/ JAL re revisions to plan and related materials (multiple) (.5); communications w/ TEP, JAL, and KCM re same (.2); revise plan, trust agreement, and TDP (1.1); communications w/ JAL, TEP, ACM, D. Cox, and J. Raskin re same (.2); communications w/ D. Cox and JAL re confirmation hearing prep (.1); communications w/ S. Andelman re same (.1); revise plan schedule (.6); communications w/ JAL re same (.2); communications w/ TEP, D. Cox, and JAL re same (.1).	3.3	\$810.00	\$2,673.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
8/21/2025	JAL	Teleconference w/ T. Long and NRM re draft plan modifications and next steps (.2); conferences w/ NRM re preparation for confirmation hearing (.7); correspond w/ TEP, NRM, KCM, and ACM re same (.4); communications w/ B. Edwards, D. Cox, J. Raskin, TEP, KCM, ACM, and NRM re confirmation hearing prep (.4); review and analyze materials re confirmation issues (1.8).	3.5	\$1,520.00	\$5,320.00
8/21/2025	NRM	Confer w/ T. Long and JAL re draft plan modifications and next steps (.2); communications w/ D. Salzman, K. Harrison, and JAL re same (.2); communications w/ B. Bell, JAL, TEP, D. Cox, J. Raskin, T. Brown, J. Rovira, and T. Long re same (.1); communications w/ TEP, JAL, KCM, and ACM re same (.2); research re same (.6); conferences w/ JAL re preparation for confirmation hearing (.7); research re same (1.3); confer w/ MEB oral argument outlines re same (.4); communications w/ MEB re same (.1); draft memorandum re same (.5); communications w/ CG, JAG, and RLD re same (.1); review draft witness and exhibit list (.4).	4.8	\$810.00	\$3,888.00
8/21/2025	MEB	Confer w/ NRM re memo and oral argument outlines for confirmation hearing (.4); research case law re plan issues (.9); draft oral argument outline (1.3); review Chubb confirmation objection (.3).	2.9	\$550.00	\$1,595.00
8/22/2025	JAL	Review revised exhibit list for confirmation hearing (.2); review and analyze materials in connection w/ witness prep session (.6); teleconference w/ T. Brown, D. Cox, C. Tully, S. Andelman, B. Ball, J. Rovira, M. Berkin, and W. Scheff re witness and confirmation hearing prep (1.7); communicate w/ NRM re developments and next steps (.1); review and analyze materials in prep for confirmation hearing (2.2); review and comments on insurer's proposed Plan changes (.3); review and analyze proposed revisions and correspond w/ D. Cox and J. Raskin re same (.4); correspond w/ J. Rovira re same (.3).	5.8	\$1,520.00	\$8,816.00
8/22/2025	TEP	Communications w/ ACM re plan issues (.2); communicate w/ NRM re same (.1); communications w/ JAL and NRM re plan issues, insurer communication, and next steps (.4).	0.7	\$1,455.00	\$1,018.50
8/23/2025	JAL	Review and analyze materials in prep for confirmation hearing.	1.6	\$1,520.00	\$2,432.00
8/23/2025	TEP	Communications w/ JAL and NRM re insurer and plan issues and next steps.	0.2	\$1,455.00	\$291.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
8/23/2025	NRM	Revise oral argument outlines (2.1); research re same (.6); communications w/ JAL re confirmation hearing prep (.1).	2.8	\$810.00	\$2,268.00
8/24/2025	ACM	Communications w/ TEP re proposed Plan revisions.	0.2	\$1,200.00	\$240.00
8/24/2025	JAL	Review and analyze materials in prep for confirmation hearing (1.6); confer w/ T. Brown, T. Long, J. Rovira, D. Cox, C. Tully, R. Van Epps, C. Lascell, and NRM (partial) re witness and confirmation hearing prep (5.9); conferences w/ NRM re same (.6).	8.1	\$1,520.00	\$12,312.00
8/24/2025	NRM	Teleconference w/ T. Brown, T. Long, J. Rovira, JAL, D. Cox, C. Tully, R. Van Epps, and C. Lascell re confirmation hearing prep (partial) (4.4); communications w/ MEB re hearing prep (.2); confer w/ JAL re same (multiple) (.6).	5.2	\$810.00	\$4,212.00
8/25/2025	JAL	Communicate w/ J. Rovira re proposed plan modifications (.1); review and analyze materials in prep for confirmation hearing (.6); attend confirmation hearing (7.4); conferences w/ NRM re hearing prep (.3); review and revise closing argument outlines (3.0).	11.4	\$1,520.00	\$17,328.00
8/25/2025	NRM	Attend confirmation hearing (7.4); conferences w/ JAL re hearing prep (.3); communications w/ JAL re same (.1); revise oral argument outline (2.3); research re same (1.6); communications w/ CG and MEB re same (.2); communications w/ MEB re same (.3).	12.2	\$810.00	\$9,882.00
8/26/2025	ACM	Review confirmation update (.2); communications w/ TEP re FCR meeting (.1).	0.3	\$1,200.00	\$360.00
8/26/2025	JAL	Draft and revise oral argument outlines (.7); attend confirmation hearing (6.6); teleconference w/ TEP and NRM re same (.1).	7.4	\$1,520.00	\$11,248.00
8/26/2025	TEP	Communications w/ NRM re confirmation hearing (.2); confer w/ JAL and NRM re same (.1).	0.3	\$1,455.00	\$436.50
8/26/2025	NRM	Attend confirmation hearing (6.6); confer w/ TEP and JAL re same (.1); confer w/ C. Tully re same (.1); prepare re same (.8); communications w/ MEB re same (.1).	7.7	\$810.00	\$6,237.00
8/27/2025	ACM	Teleconference w/ FCR re Trust issues.	0.1	\$1,200.00	\$120.00
8/28/2025	ACM	Exchange emails w/ prospective Trustees re case status (.2); exchange emails w/ M. Eskin re same (.1).	0.3	\$1,200.00	\$360.00
8/28/2025	JAL	Teleconference w/ NRM re inserts for proposed findings of fact and conclusions of law.	0.2	\$1,520.00	\$304.00
8/28/2025	TEP	Review ACM, prospective Trustees, and M. Eskin communications re Trust issue.	0.1	\$1,455.00	\$145.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
8/28/2025	NRM	Confer w/ JAL re findings of fact and conclusions of law (.2); confer w/ T. Long re same (.2); review correspondence from D. Cox, J. Raskin, and JAL re proposed plan revisions (.2).	0.6	\$810.00	\$486.00
8/29/2025	ACM	Communicate w/ TEP and M. Eskin re meeting w/ Trustee nominees.	0.1	\$1,200.00	\$120.00
8/29/2025	JAL	Teleconferences w/ TEP re potential plan modifications (.2); correspond w/ NRM and TEP re potential plan modification (.1).	0.3	\$1,520.00	\$456.00
8/29/2025	KCM	Teleconferences w/ TEP re plan revisions and related issues.	0.6	\$1,970.00	\$1,182.00
8/29/2025	TEP	Communications w/ JAL and NRM re plan revisions (.2); communicate w/ NRM re same (.1); conferences w/ JAL re same (.2); conferences w/ KCM re same (.6).	1.1	\$1,455.00	\$1,600.50
Total			118.20		\$146,675.00
.15 Committee Meetings/Conferences					
8/1/2025	TEP	Communications w/ constituent re case status (.2); communications w/ JAL and NRM re same (.1).	0.3	\$1,455.00	\$436.50
8/3/2025	TEP	Communications w/ JAL and NRM re Committee meeting and status.	0.3	\$1,455.00	\$436.50
8/4/2025	TEP	Communications w/ Committee co-chairs re case status and Committee meeting (.2); communications w/ JAL and NRM re Committee co-chair inquiry (.1); communicate w/ Committee co-chair re case issue (.1).	0.4	\$1,455.00	\$582.00
8/5/2025	TEP	Communicate w/ Committee co-chair re Trust issue (.1); communicate w/ T. Brown re constituent inquiry (.1).	0.2	\$1,455.00	\$291.00
8/6/2025	TEP	Communications w/ constituent re case status (.2); communications w/ JAL and NRM re same (.1).	0.3	\$1,455.00	\$436.50
8/6/2025	NRM	Confer w/ Committee member re Liberty adversary proceeding.	0.1	\$810.00	\$81.00
8/7/2025	JAL	Review draft communication to Committee.	0.1	\$1,520.00	\$152.00
8/7/2025	TEP	Communications w/ JAL and NRM re Committee update.	0.2	\$1,455.00	\$291.00
8/7/2025	NRM	Communications w/ Committee re recent filings.	0.3	\$810.00	\$243.00
8/8/2025	TEP	Communications w/ JAL and NRM re Committee member inquiry (.1); confer w/ Committee co-chair re Trust issues (.3); communicate w/ Committee co-chair re same (.1); communicate w/ ACM re same (.1); communications w/ constituent re case status (.3); communications w/ NRM and JAL re same (.2).	1.1	\$1,455.00	\$1,600.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
8/8/2025	NRM	Communications w/ Committee re confirmation issues (.1); communications w/ JAL and TEP re same (.1); communications w/ TEP and JAL re constituent inquiry re Liberty Mutual adversary proceeding (.1).	0.3	\$810.00	\$243.00
8/11/2025	TEP	Communications w/ Committee co-chairs re Committee meeting and status (.2); communications w/ constituent re same (.1); communications w/ JAL and NRM re constituent inquiry (.1).	0.4	\$1,455.00	\$582.00
8/12/2025	TEP	Communications w/ Committee co-chairs re Committee meeting and case status (.1); communicate w/ Committee re same (.2).	0.3	\$1,455.00	\$436.50
8/13/2025	TEP	Communicate w/ Committee re meeting (.1); communications w/ Committee member re same (.1); communications w/ JAL and NRM re Committee communication (.2); communications w/ constituent re status conference (.1); communications w/ NRM re same (.1).	0.6	\$1,455.00	\$873.00
8/13/2025	NRM	Communications w/ Committee re scheduling conference in adversary proceeding (.1); communications w/ JAL and TEP re same (.1); draft memo to Committee re same (.4).	0.6	\$810.00	\$486.00
8/14/2025	NRM	Communications w/ JAL and TEP re communications to Committee (.2); communications w/ Committee re same (.1).	0.3	\$810.00	\$243.00
8/15/2025	TEP	Confer w/ Committee co-chair re Trust admin issues (.2); confer w/ Committee member re same (.2); communications w/ NRM re Committee communication (.2).	0.6	\$1,455.00	\$873.00
8/15/2025	NRM	Communications w/ Committee re FCR appeal brief.	0.1	\$810.00	\$81.00
8/17/2025	TEP	Communications w/ JAL and NRM re Committee communication.	0.2	\$1,455.00	\$291.00
8/17/2025	NRM	Communicate w/ Committee re draft filings (.1); communications w/ JAL and TEP re same (.1).	0.2	\$810.00	\$162.00
8/18/2025	ACM	Review communication to Committee re upcoming meeting.	0.1	\$1,200.00	\$120.00
8/18/2025	TEP	Communications w/ JAL and NRM re agenda/minutes (.1); communications w/ constituents re case filings (.3); communications w/ JAL and NRM re same (.1); confer w/ constituent re same (.1); communications w/ NRM re Committee co-chair communication (.2).	0.8	\$1,455.00	\$1,164.00
8/18/2025	NRM	Communications w/ TEP and JAL re Committee agenda and minutes (.2); revise minutes (.3); revise agenda (.1); communications w/ Committee co-chair re retained causes of action (.1); communications w/ Committee re same (.1).	0.8	\$810.00	\$648.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
8/19/2025	ACM	Attend Committee meeting.	0.3	\$1,200.00	\$360.00
8/19/2025	JAL	Teleconference w/ NRM re upcoming Committee meeting (.2); review and analyze materials in prep for Committee meeting (.6); attend Committee meeting (.3); review draft communication to Committee (.3).	1.4	\$1,520.00	\$2,128.00
8/19/2025	TEP	Prepare for Committee meeting (.4); conferences w/ NRM re same and Committee co-chair communications (.4); review materials re same (.3); attend Committee meeting (.3).	1.4	\$1,455.00	\$2,037.00
8/19/2025	NRM	Attend Committee meeting (.3); conferences w/ TEP re communications to Committee co-chair (.4); draft memo to Committee re plan issues (.5); confer w/ JAL re same (.2).	1.4	\$810.00	\$1,134.00
8/20/2025	TEP	Communications w/ Committee co-chair re plan supplement (.2); communications w/ Committee co-chair re plan edits (.2); communications w/ Committee members re same (.3); confer w/ Committee member re same (.1); communications w/ constituent re case inquiry (.1).	0.9	\$1,455.00	\$1,309.50
8/21/2025	TEP	Communications w/ Committee co-chairs re hearing and status (.2); review NRM and JAL communications re Committee update (.1); confer w/ NRM re same (.1).	0.4	\$1,455.00	\$582.00
8/21/2025	NRM	Draft communication to Committee re hearing (.4); confer w/ TEP re same (.1); communications w/ Committee re same (.1).	0.6	\$810.00	\$486.00
8/24/2025	JAL	Review draft communication to Committee.	0.2	\$1,520.00	\$304.00
8/24/2025	TEP	Review NRM communication to Committee re plan edits (.1); communications w/ Committee co-chairs re same (.2); communications w/ JAL, ACM, and NRM re same (.2); communications w/ Committee members re same (.3); communications w/ constituent re confirmation hearing (.1).	0.9	\$1,455.00	\$1,309.50
8/25/2025	TEP	Communications w/ Committee co-chairs re Committee meeting (.1); communicate w/ Committee and NRM re same (.2).	0.3	\$1,455.00	\$436.50
8/26/2025	JAL	Review draft communication to Committee.	0.1	\$1,520.00	\$152.00
8/26/2025	TEP	Communications w/ constituent re confirmation hearing (.1); communications w/ NRM re same (.1); communications w/ Committee co-chairs re case status (.1); review draft Committee communication and communications w/ NRM re same (.1).	0.4	\$1,455.00	\$582.00
8/26/2025	NRM	Communications w/ Committee re hearing (.3); communications w/ TEP and JAL re same (.2).	0.5	\$810.00	\$405.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
8/29/2025	TEP	Communications w/ JAL and NRM re Committee communication.	0.1	\$1,455.00	\$145.50
8/30/2025	JAL	Review and revise draft communication to Committee.	0.4	\$1,520.00	\$608.00
8/30/2025	TEP	Communications w/ JAL and NRM re Committee communication.	0.2	\$1,455.00	\$291.00
8/30/2025	NRM	Communications w/ TEP and JAL re Committee communications (.2); communications w/ D. Cox, J. Raskin, JAL, and TEP re same (.2).	0.4	\$810.00	\$324.00
Total			18.50		\$23,346.50
.16 Travel					
8/12/2025	JAL	Travel to Richmond for hearing.	0.3	\$760.00	\$228.00
8/13/2025	JAL	Return travel to DC after hearing.	0.5	\$760.00	\$380.00
8/20/2025	JAL	Travel to Richmond for hearing.	0.2	\$760.00	\$152.00
8/21/2025	JAL	Return travel to DC after hearing.	0.9	\$760.00	\$684.00
8/23/2025	JAL	Travel to Richmond.	0.5	\$760.00	\$380.00
8/23/2025	NRM	Travel to Richmond for confirmation hearing.	0.6	\$405.00	\$243.00
8/26/2025	JAL	Return travel to DC after hearing.	1.8	\$760.00	\$1,368.00
8/26/2025	NRM	Return travel to DC after hearing.	1.4	\$405.00	\$567.00
Total			6.20		\$4,002.00
.18 Fee Applications-Others					
8/7/2025	TEP	Communications w/ JAL and NRM re UST inquiry on expert invoices.	0.1	\$1,455.00	\$145.50
8/7/2025	NRM	Communications w/ JAL and TEP re UST inquiry into NERA fee application.	0.1	\$810.00	\$81.00
8/14/2025	NRM	Communications w/ C. Tully, M. Berkin, W. Scheff, and S. Andelman re FTI interim fee application.	0.2	\$810.00	\$162.00
8/17/2025	NRM	Revise certificates of no objection for FTI and NERA interim fee applications and revise proposed order for FTI interim fee application.	0.4	\$810.00	\$324.00
8/20/2025	NRM	Communications w/ FTI team re interim fee application order (.1); communications w/ NERA team re same (.1).	0.2	\$810.00	\$162.00
8/21/2025	NRM	Communications w/ T. Brown re interim fee applications (.1); communications w/ FTI team re same (.1); communications w/ NERA team re same (.1).	0.3	\$810.00	\$243.00
8/24/2025	JAL	Review and comments on draft MLB 12th monthly fee statement.	0.3	\$1,520.00	\$456.00
8/25/2025	NRM	Review Morgan Lewis monthly fee statement (.3); communications w/ JAL and CG re same (.1).	0.4	\$810.00	\$324.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.18 Fee Applications-Others					
8/29/2025	NRM	Communications w/ C. DeSantis re Morgan Lewis monthly fee statement.	0.1	\$810.00	\$81.00
Total			2.10		\$1,978.50
Total Professional Services			295.7		\$325,528.00

PERSON RECAP

Person		Title	Hours	Rate	Amount
JAL	Jeffrey A. Liesemer	Member	109.9	\$1,520.00	\$167,048.00
JAL	Jeffrey A. Liesemer	Member	4.2	\$760.00	\$3,192.00
KCM	Kevin C. Maclay	Member	3.1	\$1,970.00	\$6,107.00
ACM	Ann C. McMillan	Member	6.6	\$1,200.00	\$7,920.00
TEP	Todd E. Phillips	Member	22.9	\$1,455.00	\$33,319.50
JPW	James P. Wehner	Member	1.0	\$1,520.00	\$1,520.00
NRM	Nathaniel R. Miller	Of Counsel	97.4	\$810.00	\$78,894.00
NRM	Nathaniel R. Miller	Of Counsel	2.0	\$405.00	\$810.00
MEB	Matthew E. Beckerman	Associate	48.1	\$550.00	\$26,455.00
RLD	Rachael L. Davis	Paralegal	0.5	\$525.00	\$262.50

DISBURSEMENTS

Date	Description of Disbursements	Amount
08/06/2025	PACER SERVICE CENTER- Pacer Charges- [.10]	\$206.40
08/06/2025	PACER SERVICE CENTER- Pacer Charges- [.17]	\$12.10
08/06/2025	PACER SERVICE CENTER- Pacer Charges- [.17]	\$10.30
08/06/2025	PACER SERVICE CENTER- Pacer Charges- [.17]	\$3.00
08/06/2025	PACER SERVICE CENTER- Pacer Charges- [.17]	\$5.70
08/06/2025	PACER SERVICE CENTER- Pacer Charges- [.17]	\$0.10
08/06/2025	PACER SERVICE CENTER- Pacer Charges- [.17]	\$0.10
08/06/2025	PACER SERVICE CENTER- Pacer Charges- [.17]	\$8.60
08/07/2025	Local Transportation - DC - Overnight parking (NRM) [.16]	\$52.00
08/07/2025	Court Reporting/Transcript Service - Scarcella deposition tr 7/23/25 [.10]	\$1,095.00
08/08/2025	Outside Duplication Service - hr'g prep materials [.10]	\$203.10
08/12/2025	Trvl Exp - Meal for JAL and NRM in Richmond, VA [.16]	\$165.52
08/12/2025	Trvl Exp - Hotel charges in Richmond, VA 8/12-8/13 (JAL) [.16]	\$254.65

DISBURSEMENTS

Date	Description of Disbursements	Amount
08/13/2025	Court Reporting/Transcript Service - Lascell deposition tr [.10]	\$3,190.95
08/13/2025	Trvl Exp - Meal for JAL and NRM in Richmond, VA [.16]	\$49.94
08/13/2025	Trvl Exp - Hotel charges in Richmond, VA 8/12-8/13 (NRM) [.16]	\$262.79
08/13/2025	Taxi - Transportation for JAL and NRM to/from Richmond for hr'g. [.16]	\$1,750.00
08/20/2025	Trvl Exp - Meal for JAL and NRM at hotel in Richmond [.16]	\$160.72
08/20/2025	Trvl Exp - Hotel charges in Richmond, VA 8/20-8/21 (JAL) [.16]	\$260.47
08/21/2025	Trvl Exp - Hotel charges in Richmond, VA 8/20-8/21 (NRM) [.16]	\$260.47
08/21/2025	Trvl Exp - Meal for JAL and NRM at hotel in Richmond [.16]	\$83.37
08/21/2025	Trvl Exp - Meal for NRM at hotel in Richmond [.16]	\$13.45
08/21/2025	Trvl Exp - Meal for JAL in Richmond [.16]	\$8.67
08/21/2025	Taxi - Transportation for JAL and NRM to/from Richmond for hr'g. [.16]	\$2,450.00
08/23/2025	Trvl Exp - Hotel charges in Richmond, VA 8/23-8/26 (JAL) [.16]	\$659.31
08/24/2025	Trvl Exp - Meal for JAL and NRM at hotel in Richmond [.16]	\$56.67
08/24/2025	Trvl Exp - Meal for JAL and NRM at hotel in Richmond [.16]	\$126.83
08/24/2025	Taxi - Transportation for JAL and NRM to prep session. [.16]	\$15.30
08/24/2025	Taxi - Transportation for JAL and NRM from prep session. [.16]	\$19.07
08/25/2025	Outside Duplication Service - Add'l prep materials for JAL [.10]	\$9.38
08/25/2025	Outside Duplication Service - prep materials re motion to stay [.10]	\$17.38
08/25/2025	Trvl Exp - Meal for JAL and NRM at hotel in Richmond [.16]	\$57.81
08/26/2025	Trvl Exp - Hotel charges in Richmond, VA 8/23-8/26 (NRM) [.16]	\$659.31
08/26/2025	Trvl Exp - Meal for JAL and NRM at hotel in Richmond [.16]	\$73.43
08/27/2025	Taxi - Transportation for NRM and JAL to/from Richmond for hr'g. [.16]	\$2,325.00
08/31/2025	Database Research - Westlaw - OHR - 08/01-04/2025 [.10]	\$675.87
08/31/2025	Database Research - Westlaw - NRM - 08/04-25/2025 [.10]	\$97.33
08/31/2025	Database Research - Westlaw - CG - 08/13-20/2025 [.10]	\$110.82
08/31/2025	Database Research - Westlaw - MEB - 08/01-29/2025 [.10]	\$610.62
08/31/2025	Database Research - Lexis - MEB - 08/08-12/2025 [.10]	\$20.86
08/31/2025	Database Research - Lexis - JAL - 08/21/2025 [.10]	\$20.86
Total Disbursements		\$16,063.25

Total Services	\$325,528.00
Total Disbursements	\$16,063.25
Total Current Charges	\$341,591.25

TASK RECAP

Services

<u>Category</u>	<u>Hours</u>	<u>Amount</u>
.07	5.30	\$6,609.00
.10	145.40	\$142,917.00
.11	118.20	\$146,675.00
.15	18.50	\$23,346.50
.16	6.20	\$4,002.00
.18	2.10	\$1,978.50
	<u>295.70</u>	<u>\$325,528.00</u>

Disbursements

<u>Category</u>	<u>Amount</u>
.10	\$6,258.57
.16	\$9,764.78
.17	\$39.90
	<u>\$16,063.25</u>

BREAKDOWN BY PERSON

<u>Person</u>	<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JAL Jeffrey A. Liesemer	.07	0.90	\$1,520.00	\$1,368.00
TEP Todd E. Phillips	.07	2.60	\$1,455.00	\$3,783.00
NRM Nathaniel R. Miller	.07	1.80	\$810.00	\$1,458.00
JAL Jeffrey A. Liesemer	.10	44.60	\$1,520.00	\$67,792.00
KCM Kevin C. Maclay	.10	2.30	\$1,970.00	\$4,531.00
TEP Todd E. Phillips	.10	3.30	\$1,455.00	\$4,801.50
JPW James P. Wehner	.10	0.70	\$1,520.00	\$1,064.00
NRM Nathaniel R. Miller	.10	49.10	\$810.00	\$39,771.00
MEB Matthew E. Beckerman	.10	44.90	\$550.00	\$24,695.00

BREAKDOWN BY PERSON

<u>Person</u>		<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLD	Rachael L. Davis	.10	0.50	\$525.00	\$262.50
JAL	Jeffrey A. Liesemer	.11	61.90	\$1,520.00	\$94,088.00
KCM	Kevin C. Maclay	.11	0.80	\$1,970.00	\$1,576.00
ACM	Ann C. McMillan	.11	6.20	\$1,200.00	\$7,440.00
TEP	Todd E. Phillips	.11	6.60	\$1,455.00	\$9,603.00
JPW	James P. Wehner	.11	0.30	\$1,520.00	\$456.00
NRM	Nathaniel R. Miller	.11	39.20	\$810.00	\$31,752.00
MEB	Matthew E. Beckerman	.11	3.20	\$550.00	\$1,760.00
JAL	Jeffrey A. Liesemer	.15	2.20	\$1,520.00	\$3,344.00
ACM	Ann C. McMillan	.15	0.40	\$1,200.00	\$480.00
TEP	Todd E. Phillips	.15	10.30	\$1,455.00	\$14,986.50
NRM	Nathaniel R. Miller	.15	5.60	\$810.00	\$4,536.00
JAL	Jeffrey A. Liesemer	.16	4.20	\$760.00	\$3,192.00
NRM	Nathaniel R. Miller	.16	2.00	\$405.00	\$810.00
JAL	Jeffrey A. Liesemer	.18	0.30	\$1,520.00	\$456.00
TEP	Todd E. Phillips	.18	0.10	\$1,455.00	\$145.50
NRM	Nathaniel R. Miller	.18	1.70	\$810.00	\$1,377.00
				<u>295.70</u>	<u>\$325,528.00</u>