

REAVES PLLC

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CAMPBELL & LEVINE, LLC

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

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

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

**FOURTH MONTHLY APPLICATION OF CAMPBELL & LEVINE, LLC
AS COUNSEL TO THE FUTURE CLAIMANTS' REPRESENTATIVE
FOR THE PERIOD FROM SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025**

Basic Information	
Name of Applicant:	Campbell & Levine, LLC
Name of Client:	FCR
Date of Retention:	June 18, 2025, effective as of May 15, 2025
Time Period Covered:	September 1, 2025 through and including September 30, 2025
Total Hours Billed:	12.1
Total Fees Requested:	\$7,136
Total Expenses Requested:	\$0
Type of Fee Statement:	Fourth Monthly Application in accordance with the Interim Compensation Order
Fees Requested Over Budget:	None
Rate Increases Not Previously Approved/Disclosed:	None



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AND NOW, comes Campbell & Levine, LLC (the “Applicant”), counsel to Marla Rosoff Eskin, as Future Claimants’ Representative (the “FCR”) for the estate of the debtor, Hopeman Brothers, Inc. (the “Debtor”), pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Rules”), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief*, entered September 9, 2024 [Dkt. 162] (the “Interim Compensation Order”) and submits this First Interim Application (this “Application”) for the reasonable and necessary legal services rendered by the Applicant for the period May 15, 2025, through September 30, 2025 (the “Application Period”) and reimbursement of the actual and necessary expenses that the Applicant incurred during the Application Period.

By this Application, the Applicant seeks payment of its reasonable and necessary legal fees and expenses incurred during the Application Period in the total amount of \$5,708, consisting of (i) 5,708, which is 80% of the fees incurred by the Applicant for reasonable and necessary legal services to the FCR during the Application Period from September 1, 2025 through September 30, 2025, and (ii) \$0 for actual and necessary costs and expenses incurred during the Application.

Itemization of Services and Legal Fees Incurred

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

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

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

Representations

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

Notice

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

WHEREFORE, the Applicant requests payment of its reasonable fees and expenses incurred during the Application Period in the amount of \$5,708, consisting of (i) \$5,708, which is 80% of the fees incurred by the Applicant for reasonable and necessary legal services to the FCR during the Application Period from September 1, 2025 through September 30, 2025, (ii) \$0 for actual and necessary costs and expenses incurred during the Application Period.

Dated: October 16, 2025

Respectfully submitted,

/s/ Michael G. Wilson

Michael G. Wilson (VSB No. 48927)

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Claimants' Representative*

EXHIBIT A

Statement of Fees by Subject Matter During the Application Period

Task Code	Matter Description	Hours	Fees Requested
.01	Plan of Reorganization	6.9	\$4,591.00
.02	Liberty Mutual Declaratory Judgment Action	5.2	\$2545.00
.03	Travel	0	\$0
TOTAL			\$7,136.00

EXHIBIT B

Professionals Rendering Services During the Fee Period

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

Professional	Position	Hourly Billing Rate	Total Hours Billed	Total Compensation
Douglas A. Campbell	Member	\$900.00	0	\$0
David B. Salzman	Member	\$825.00	3.2	\$2,640.00
Marla R. Eskin	Member	\$800.00	2.0	\$1,600.00
Paul J. Cordaro	Member	\$625.00	0	\$0
Kathryn L. Harison	Member	\$450.00	5.9	\$2,655.00
Shannon M. Clougherty	Member	\$550.00	0	\$0
Katherine L. Hemming	Counsel	\$500.00	.3	\$150.00
Fred D. Rapone	Counsel	\$475.00	0	\$0
Joseph C. Bacharach	Associate	\$275.00	0	\$0
Heather L. Jiuliente	Paralegal	\$155.00	.2	\$31.00
Theresa M. Matiasic	Paralegal	\$140.00	0	\$0
Kaitlan A. Monahan	Paralegal	\$120.00	.5	\$60.00
		Total		\$7,136.00

EXHIBIT C

Summary of Expenses

Type	Amount
Travel Related Expenses	\$0
Westlaw/Pacer and Related Office Expenses	\$0

EXHIBIT D

Statement for September 1, 2025 through September 30, 2025

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Statement Date: September 30, 2025

Hopeman Brother, Inc.

Statement No. 5

Account No. 3100.01

Plan of Reorganization

PREVIOUS BALANCE \$173,122.00

			HOURS	
09/01/2025	MRE	E-mails with A. McMillan re: zoom call wtih Trustees	0.10	80.00
09/02/2025	KH	Discussion with MRE re: status of matters and to do list	0.30	150.00
	MRE	Meeting with K. Hemming re: organizational matters	0.30	240.00
09/03/2025	MRE	Telephone conference with K. Harrison re: update and meeting with Trustees	0.20	160.00
09/04/2025	KLH	Review of status of Plan matters; review information from Plan proponents and e-mail to MRE re: same	0.60	270.00
09/05/2025	MRE	Review of documents and virtual meeting with Trustees	1.00	800.00
	KLH	E-mail with Committee counsel re: various matters related to Plan matters	0.50	225.00
09/06/2025	KLH	Review findings of facts and conclusions of law from various parties	1.10	495.00
09/08/2025	HLJ	E-mail to KLH and DBS re: filings of substance in Hopeman bankruptcy case	0.20	31.00
09/18/2025	DBS	Review Travelers' redaction Motion	0.10	82.50
	DBS	Review Second Amended Plan	0.30	247.50
	DBS	Review Plan Proponents' Proposed Confirmation Findings of Fact and Conclusions of Law	0.90	742.50
	DBS	Review Travelers' proposed Findings of Fact and Conclusions of Law	0.60	495.00
09/22/2025	DBS	Meet with KLH to discuss case developments and strategy	0.50	412.50
09/29/2025	MRE	Telephone conference with D. Salzman re: status	0.20	160.00

Plan of Reorganization

	HOURS	
FOR CURRENT SERVICES RENDERED	6.90	4,591.00

RECAPITULATION			
<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
David B. Salzman	2.40	\$825.00	\$1,980.00
Heather L. Jiuliente	0.20	155.00	31.00
Kathryn L. Harrison	2.20	450.00	990.00
Marla R. Eskin	1.80	800.00	1,440.00
Katherine Hemming	0.30	500.00	150.00

TOTAL CURRENT WORK	4,591.00
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09/12/2025	Payment - Thank you. (June 2024 - 80% Fees)	-87,876.00
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BALANCE DUE	<u>\$89,837.00</u>
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Any payments received after the statement date will be applied to next month's statement. Please note your account number on your payment. Thank you.

CAMPBELL
& LEVINE, LLC | Attorneys at Law

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Statement Date: September 30, 2025

Hopeman Brother, Inc.

Statement No.

5

Account No.

3100.02

Liberty Declaratory Judgment Action

PREVIOUS BALANCE \$65,780.00

			HOURS	
09/03/2025	KLH	Review responses to Motions to Dismiss from Insurers	1.70	765.00
09/04/2025	KLH	Review of status of motions to dismiss and e-mail with MRE for trustee meeting re: same	0.70	315.00
09/15/2025	KM	Prepared August 2025 Monthly Fee Application	0.50	60.00
09/18/2025	DBS	Review Court Order re: Motion to Withdraw Liberty Adversary	0.10	82.50
09/29/2025	DBS	Review Liberty Response to Objection to Withdrawal Motion	0.20	165.00
	DBS	Call with FCR to update as to case status	0.20	165.00
	DBS	Call with N. Miller re: case developments	0.20	165.00
	DBS	Call with FCR to discuss Miller call issues	0.10	82.50
	MRE	Telephone conference with DBS re: Liberty Adversary	0.20	160.00
		FOR CURRENT SERVICES RENDERED	3.90	1,960.00

RECAPITULATION

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
David B. Salzman	0.80	\$825.00	\$660.00
Kaitlan Monahan	0.50	120.00	60.00
Kathryn L. Harrison	2.40	450.00	1,080.00
Marla R. Eskin	0.20	800.00	160.00

TOTAL CURRENT WORK 1,960.00

09/12/2025 Payment - Thank you. (June 2024 - 80% Fees) -7,550.00

Liberty Declaratory Judgment Action

BALANCE DUE

\$60,190.00

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

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Statement Date: September 30, 2025

Hopeman Brother, Inc.

Statement No. 5

Account No. 3100.03

Travel

PREVIOUS BALANCE \$22,302.50

			HOURS	
09/04/2025	KLH	Review TDP and role of various trustees and e-mail to MRE for preparation for trustee call; review appeal brief of insurers related to FCR appointment and e-mail with MRE re: same	1.30	585.00
		FOR CURRENT SERVICES RENDERED	1.30	585.00

	RECAPITULATION			
TIMEKEEPER		HOURS	HOURLY RATE	TOTAL
Kathryn L. Harrison		1.30	\$450.00	\$585.00

TOTAL CURRENT WORK 585.00

09/12/2025 Payment - Thank you. (June 2024 - 80% Fees) -10,560.00

BALANCE DUE \$12,327.50

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

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Hopeman Brother, Inc.

Statement Date: September 30, 2025

Statement No. 5

Account No. 3100.03

PREVIOUS BALANCE	FEES	EXPENSES	ADVANCES	PAYMENTS	BALANCE
3100-01 Plan of Reorganization 173,122.00	4,591.00	0.00	0.00	-87,876.00	\$89,837.00
3100-02 Liberty Declaratory Judgment Action 65,780.00	1,960.00	0.00	0.00	-7,550.00	\$60,190.00
3100-03 Travel 22,302.50	585.00	0.00	0.00	-10,560.00	\$12,327.50
<u>261,204.50</u>	<u>7,136.00</u>	<u>0.00</u>	<u>0.00</u>	<u>-105,986.00</u>	<u>\$162,354.50</u>

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