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*Special Insurance 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 COVER SHEET TO THE FIFTH INTERIM FEE APPLICATION
 OF MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL TO
 THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE INTERIM PERIOD OF JUNE 1, 2025 THROUGH AUGUST 31, 2025**

Basic Information	
Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Petition Date:	June 30, 2024 (the " Petition Date ")
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Fifth Interim Fee Application	
Fifth Interim Period:	June 1, 2025 through August 31, 2025
Total Hours Billed:	348.70
Total Fees Requested:	\$478,841.00



Total Expenses Requested:	\$19,258.25
Blended Rate for All Timekeepers:	\$1,373.22
Blended Rate for Attorneys:	\$1,408.83
Rate Increases Not Previously Approved or Disclosed:	Pursuant to internal operating procedures and past practices, Morgan Lewis adjusts as appropriate its hourly rates on January 1 st of each year. The table in this fifth interim fee application labeled “Summary of Professionals Rendering Services for the Fifth Interim Period” reflects the hourly rate increase for professionals and paraprofessionals providing services to the Unsecured Creditors’ Committee during the pendency of this case.
Total Professionals:	12
Total Professionals Billing Less Than 15 Hours:	10
Historical	
Fees Approved to Date by Interim Fee Order(s):	\$1,690,133.50
Expenses Approved to Date by Interim Fee Order(s):	\$79,479.38
Total Fees and Expenses Approved to Date:	\$1,769,612.88
Approved Amounts Paid to Date:	\$1,769,612.88
Fees Paid Pursuant to Monthly Statements for the Fifth Interim Period and Not Yet Allowed:	\$0.00
Expenses Paid Pursuant to Monthly Statements for the Fifth Interim Period and Not Yet Allowed:	\$0.00
Total Fees and Expenses Paid Pursuant to Monthly Statements for the Fifth Interim Period and Not Yet Allowed:	\$0.00
This is a(n):	<input type="checkbox"/> Monthly <input checked="" type="checkbox"/> Interim <input type="checkbox"/> Final Application

**MONTHLY FEE STATEMENTS
SUBJECT TO THE FIFTH INTERIM PERIOD:**

Docket No.	Period Covered	Requested		Paid	
		Fees	Expenses	Fees Paid	Expenses Paid
1070	June 1, 2025 through June 30, 2025	\$106,149.20 (80% of \$132,686.50)	\$3,042.95	\$0.00	\$0.00
1178	July 1, 2025, through July 31, 2025	\$124,012.40 (80% of \$155,015.50)	\$5,468.65	\$0.00	\$0.00

1209	August 1, 2025 through August 31, 2025	\$152,911.20 (80% of \$191,139.00)	\$10,746.65	\$0.00	\$0.00
	Total	\$383,072.80 (80% of \$478,841.00)	\$19,258.25	\$0.00	\$0.00

PRIOR INTERIM FEE ORDER(S):

Docket No.	Period Covered	Requested		Allowed on Interim Basis	
		Fees	Expenses	Fees Allowed	Expenses Allowed
357	July 29, 2024 through August 31, 2024	\$230,210.00	\$90.00	\$230,210.00	\$90.00
558	September 1, 2024 through November 30, 2024	\$958,844.00	\$27,121.23	\$953,744.00 ¹	\$27,121.23
823	December 1, 2024 through February 28, 2025	\$297,566.00	\$43,020.59	\$294,066.00 ²	\$43,020.59
1127	March 1, 2025 through May 31, 2025	\$221,346.00	\$9,247.56	\$212,113.50 ³	\$9,247.56

SUMMARY OF PROFESSIONALS RENDERING SERVICES FOR THE FIFTH INTERIM PERIOD:

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S	Partner	1995	Litigation	\$1,375.00	218.40	\$300,300.00
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	1.50	\$3,037.50
Raskin, Jeffrey S	Partner	1993	Litigation	\$1,550.00	100.40	\$155,620.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	11.90	\$10,115.00
Huffman, Jamie	Associate	2019	Litigation	\$1,060.00	0.20	\$212.00
Shim, David K.	Associate	2016	Finance	\$1,100.00	3.20	\$3,520.00
				Total	335.60	\$472,804.50
Non-legal Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Chirozzi, Melody		N/A		\$480.00	0.30	\$144.00
Guzzi, Tiffany	Sr. Paralegal	N/A	Litigation	\$520.00	7.00	\$3,640.00

¹ 953,744.00 includes a \$5,100 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Second Interim Fee Application.

² \$337,086.59 includes a \$3,500 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Third Interim Fee Application.

³ \$212,113.50 includes a \$9,232.50 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Fourth Interim Fee Application.

McConnell, Heather	eData Mgr	N/A	eData	\$745.00	0.10	\$74.50
Petrucci III, Philip	PT Mgr	N/A	Practice Technology	\$595.00	0.90	\$535.50
Vest, John A.	Sr. Paralegal	N/A	Litigation	\$525.00	0.30	\$157.50
Young, Helen	Legal Practice Assistant	N/A	Litigation	\$330.00	4.50	\$1,485.00
				Total	13.10	\$6,036.50
				Aggregate Total	348.70	\$478,841.00
Blended Rate for Attorneys:						\$1,408.83
Blended Rate for All Timekeepers:						\$1,373.22

**SUMMARY OF FEES BY PROJECT CATEGORY
DURING THE FIFTH INTERIM PERIOD:**

Task Code	Matter Description	Hours	Fees Requested
00	General	42.90	\$59,204.50
04	Case Administration & Calendar Control	4.50	\$1,485.00
07	Fee Applications - Self	15.90	\$14,900.00
10	Litigation	67.20	\$99,209.00
11	Plan & Disclosure Statement	213.00	\$296,805.00
15	Committee Meetings/Conferences	0.50	\$775.00
16	Travel	4.70	\$6,462.50
TOTAL		348.70	\$478,841.00

**SUMMARY OF EXPENSES INCURRED
DURING THE FIFTH INTERIM PERIOD:**

Type	Expenses
Air	\$1,318.21
Court Reporter	\$5,702.17
Court Transcripts	\$2,480.96
Data Services Active – R	\$5,220.60
Hotel	\$600.27
Other Duplicating	\$378.24
Taxi	\$116.30
User Fees (Monthly) – Relativity	\$1,140.00
Westlaw	\$2,301.50
Total	\$19,258.25

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**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 FEE APPLICATION OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE INTERIM PERIOD OF JUNE 1, 2025 THROUGH AUGUST 31, 2025**

Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), submits this fifth interim fee application (the “**Fee Application**”) for allowance of compensation for professional services provided in the amount of \$478,841.00 and reimbursement of actual and necessary expenses in the amount of \$19,258.25 incurred during the interim period

from June 1, 2025 through August 31, 2025 (the “**Fifth Interim Period**”). In support of this Fee Application, Morgan Lewis respectfully states as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Eastern District of Virginia (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference from the United States District Court for the Eastern District of Virginia*, dated August 15, 1984. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The Committee confirms its consent to the entry of a final order by the Court in connection with this Fee Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are 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 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 [Docket No. 162] (the “**Interim Compensation Order**”).

Background

4. 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.

5. On July 22, 2024, the Office of the United States Trustee for Region 4 (the “**U.S. Trustee**”) notified the Court that, pursuant to 11 U.S.C. § 1102, it had appointed the Committee [Docket No. 69]. All of the Committee’s members hold unsecured claims against the Debtor resulting from exposure to asbestos.

6. On August 28, 2024, the Committee filed an application to retain Morgan Lewis as its special insurance counsel, effective *nunc pro tunc* to July 29, 2024, pursuant to sections 327(e), 328, and 1103(a) of the Bankruptcy Code (the “**Retention Application**”) [Docket No. 124]. The Court approved the Retention Application on October 4, 2024 (the “**Retention Order**”) [Docket No. 269]. A copy of the Retention Order is attached as **Exhibit A**.

7. Pursuant to the Retention Order and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* (the “**Interim Compensation Order**”) [Docket No. 162], Morgan Lewis filed its first interim fee application seeking allowance of compensation for professional services in the amount of \$230,210.00 and reimbursement of actual and necessary expenses in the amount of \$90.00 for the period from July 29, 2024 to August 31, 2024 (the “**First Interim Fee Application**”) [Docket No. 302]. On November 13, 2024, the Court approved the First Interim Fee Application, allowing the full amounts sought on an interim basis.

8. Additionally, on January 14, 2024, Morgan Lewis filed its second interim fee application seeking allowance and compensation for professional services in the amount of \$958,844.00 and reimbursement of actual and necessary expenses in the amount of \$27,121.23 for the period from September 1, 2024 to November 30, 2024 (the “**Second Interim Fee Application**”)

[Docket No. 495]. On February 13, 2025, the Court approved the Second Interim Fee Application, allowing compensation for professional services rendered and reimbursement for expenses incurred in the aggregate amount of \$980,865.23.⁴

9. Additionally, on April 14, 2025, Morgan Lewis filed its third interim fee application seeking allowance and compensation for professional services in the amount of \$297,566.00 and reimbursement of actual and necessary expenses in the amount of \$43,020.59 for the period from December 1, 2024 to February 28, 2025 (the “**Third Interim Fee Application**”) [Docket No. 653]. On May 30, 2025, the Court approved the Third Interim Fee Application, allowing compensation for professional services rendered and reimbursement for expenses incurred in the aggregate amount of \$337,086.59.⁵

10. Additionally, on July 16, 2025, Morgan Lewis filed its fourth interim fee application seeking allowance and compensation for professional services in the amount of \$221,346.00 and reimbursement of actual and necessary expenses in the amount of \$9,247.56 for the period from March 1, 2025 to May 31, 2025 (the “**Fourth Interim Fee Application**”) [Docket No. 1031]. On August 19, 2025, the Court approved the Fourth Interim Fee Application, allowing compensation for professional services rendered in the amount of \$212,113.50⁶ and reimbursement for expenses incurred in the amount of \$9,247.56.

11. Morgan Lewis has received payment of the amounts approved by the Court in connection with the First, Second and Third Interim Fee Applications and it is awaiting payments

⁴ \$980,865.23 includes a \$5,100 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Second Interim Fee Application.

⁵ \$337,086.59 includes a \$3,500 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Third Interim Fee Application.

⁶ \$212,113.50 includes a \$9,232.50 reduction, as agreed upon by Morgan Lewis and the U.S. Trustee, in response to informal comments from the U.S. Trustee on the Fourth Interim Fee Application.

for the amounts approved by the Court in connection with the Fourth Interim Fee Application. Morgan Lewis has not yet received any payments for the Fifth Interim Period based on the monthly fee statements. Accordingly, and based on those monthly fee statements for the Fifth Interim Period, Morgan Lewis hereby submits this Fifth Interim Fee Application, seeking allowance of compensation for professional services in the amount of \$478,841.00 (inclusive of the 20% holdback) and reimbursement of actual and necessary expenses in the amount of \$19,258.25.

Services Rendered and Disbursements Incurred

12. During the Fifth Interim Period, Morgan Lewis advised the Committee on various insurance-related matters and provided necessary insurance-related services in connection with this Chapter 11 Case. Specifically, Morgan Lewis performed the following services as the Committee's special insurance counsel:

- a. Advising the Committee on steps to preserve and maximize insurance coverage;
- b. Attending meetings and negotiating with representatives of the Debtor to preserve insurance coverage and resolve disputed insurance issues;
- c. Analyzing and assisting the Committee in evaluating any settlement motions related to the Debtor's insurance policies;
- d. Investigating the Debtor's proposed settlements of insurance coverage, including coordinating with expert witnesses and the Committee's other professionals and participating in related discovery; and
- e. Providing additional advice or actions related to the Debtor's insurance coverage as needed by the Committee.

13. As set forth in the Retention Application, Morgan Lewis charged for its legal services on an hourly basis in accordance with its ordinary and customary hourly rates, traditionally adjusted each January 1. These charges included actual, reasonable, and necessary out-of-pocket disbursements incurred in connection therewith. The billing statements, attached as

Exhibit B, detail the legal services rendered, service dates, personnel involved, time spent, hourly rates, and fees attributable to each service.

14. The Interim Compensation Order authorized the monthly payment of eighty percent (80%) of fees and one hundred percent (100%) of expenses incurred by estate professionals, absent a timely objection upon notice to designated parties. Pursuant to the Interim Compensation Order, and as detailed above, Morgan Lewis filed its monthly fee statements for the Fifth Interim Period, seeking compensation of \$383,072.80 (80% of \$478,841.00) and reimbursement of total expenses incurred in the amount of \$19,258.25.

15. Through this Fee Application, Morgan Lewis seeks allowance of compensation for professional services in the full amount of \$478,841.00 (inclusive of the 20% holdback) and reimbursement of actual and necessary expenses in the amount of \$19,258.25 incurred during the Fifth Interim Period. During the Fifth Interim Period, Morgan Lewis expended a total 348.70 hours on this matter. Narrative descriptions of the services performed and the time expended during the Fifth Interim Period are provided below, organized by task or proceeding where applicable.

A. General

Total Fees: \$59,204.50
Total Hours: 42.90

16. These task codes reflect time spent by Morgan Lewis professionals evaluating various case pleadings and preparing for and attending hearings bearing on insurance coverage issues.

B. Committee Meetings/Conferences

Total Fees: \$775.00
Total Hours: 0.50

17. This task code includes time spent by Morgan Lewis professionals participating in conferences with the Committee.

C. Case Administration & Calendar Control

Total Fees: \$1,485.00

Total Hours: 4.50

18. This task code covers time spent on tasks necessary for the efficient administration of legal services related to the Chapter 11 Case. Specifically, Morgan Lewis professionals monitored critical dates, maintained a case calendar, task lists, and work-in-progress reports, and established procedures for case administration and docket monitoring.

D. Litigation

Total Fees: \$99,209.00

Total Hours: 67.20

19. This task code covers time spent by Morgan Lewis professionals on litigation matters related to the Chapter 11 Case, including: (i) analysis and preparation of pleadings in connection with adversary proceedings filed in the Chapter 11 Case; and (ii) preparing for and attending depositions and hearings conducted in connection with the Chapter 11 Case.

E. Plan & Disclosure Statement

Total Fees: \$296,805.00

Total Hours: 213.00

20. This task code covers time spent by Morgan Lewis professionals on matters relating to the Debtor's Chapter 11 Plan and Disclosure Statement, including: (i) collaborating with other committee professionals in the drafting of a proposed plan of reorganization and related plan documents and (ii) preparing for and attending the Plan confirmation hearing.

F. Fee Applications

Total Fees: \$14,900.00

Total Hours: 15.90

21. This task involves time spent by Morgan Lewis professionals on the preparation, review, and filing of monthly fee statements and the Fifth Interim Fee Application. The complexity of the invoices, resulting from the nature of the insurance-related work, required detailed review of services rendered across various tasks.

G. Expenses

22. In addition to the fees incurred above, Morgan Lewis incurred actual and necessary expenses during the Fifth Interim Period totaling \$19,258.25. Included in **Exhibit B** are itemizations, where applicable, of expenses for which Morgan Lewis seeks reimbursement in this Fee Application. All expenses for which reimbursement is sought were incurred on behalf of the Committee and no other person.

Morgan Lewis’s Requested Compensation and Reimbursement Should be Allowed

23. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court’s award of such compensation. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code “reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded . . . 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.

11 U.S.C. § 330(a)(3).

24. In determining the reasonableness of a compensation request, courts generally apply the lodestar method. *Boddy v. United States Bankruptcy Court (In re Boddy)*, 950 F.2d 334, 337 (6th Cir. 1991) (“The Supreme Court has made it clear that the lodestar method of fee calculation is the method by which federal courts should determine reasonable attorney’s fees under federal statutes that provide for such fees.”); *Shaw, Licitra, Parente, Esernio & Schwartz, P.Z. v. Travelers Indemnity Co. (In re Grant Associates)*, 154 B.R. 836, 843 (S.D.N.Y. 1993) (noting that the lodestar standard had been adopted by most courts calculating fees under section 330(a), and that “[g]iven the similarity in context and language between the two statutes, the same standard should apply” to fees under section 506(c)); *In re Drexel Burnham Lambert Grp., Inc.*, 133 B.R. 13, 21-22 (Bankr. S.D.N.Y. 1991). Courts calculate the lodestar amount by multiplying the number of hours reasonably expended by the attorney’s reasonable hourly rate. *See Drexel*, 133 B.R. at 22 (citing *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 478 U.S. 546, 565 (1986)). In assessing the reasonableness of a compensation request, there is a “strong presumption” that an attorney is entitled to the lodestar fee. *Id.*

25. Morgan Lewis submits that the compensation for services rendered and reimbursement of expenses incurred during the Fifth Interim Period are reasonable and appropriate based on: (i) the time and labor required; (ii) the complexity of the legal issues presented; (iii) the skill necessary to perform the legal services; (iv) the customary compensation for such services; and (v) the experience and ability of the attorneys providing these services.

26. The Committee retained Morgan Lewis as its special insurance counsel due to the firm's: (i) intimate familiarity with the Debtor and the specific insurance issues involved, and (ii) reputation and extensive expertise in insurance matters. Morgan Lewis's deep understanding of the Debtor and its insurance-related issues enabled efficient and cost-effective service.

27. Morgan Lewis reserves the right to request additional compensation for the Fifth Interim Period if further time or disbursement charges for services rendered or expenses incurred relate to the Fifth Interim Period.

Statement Pursuant to Appendix B Guidelines

28. The following is provided in response to the questions set forth in ¶ C.5 of 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*:

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.

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 titled Fee Applications-Self relate to Morgan Lewis preparation of monthly fee statements and 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 statements and fee applications, Morgan Lewis reviewed the time detail for privileged or confidential information.

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

Response: No.

Question: Did the client agree when retaining Morgan Lewis to accept all future rate increases? If not, did Morgan Lewis 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 Morgan Lewis's hourly rates are reviewed and revised generally on January 1st of each year.

WHEREFORE, Morgan Lewis requests that the Court enter an order: (a) awarding Morgan Lewis compensation for services rendered during the Fifth Interim Period in the amount of \$478,841.00, and reimbursement of actual, reasonable, and necessary expenses incurred during the Fifth Interim Period in the amount of \$19,258.25 ; (b) authorizing and directing the Debtor to remit payment to Morgan Lewis for such fees and expenses that remain unpaid; and (c) granting any further relief the Court deems just and appropriate under the circumstances.

Dated: October 16, 2025

By: /s/ Brady Edwards

Brady Edwards

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ELECTRONICALLY FILED BY:

/s/ Jeffrey A. Liesemer

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EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**ORDER GRANTING THE FIFTH INTERIM FEE APPLICATION OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
INTERIM PERIOD OF JUNE 1, 2025 THROUGH AUGUST 31, 2025**

Under consideration of the *Fifth Interim Fee Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of June 1, 2025 through August 31, 2025* (the “**Application**”);¹ and the Court having reviewed the Application that was served by the Committee, and finding that the Court has

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

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,

IT IS HEREBY ORDERED as follows:

1. The Application is GRANTED.
2. Morgan Lewis is hereby granted interim allowance of compensation for professional services in the amount of \$489,099.25 for professional services rendered and reimbursement for expenses incurred for the period from June 1, 2025 through August 30, 2025, in the amount of \$478,841.00 in fees and \$19,258.25 in expenses.
3. The Debtor is hereby authorized and directed to remit to Morgan Lewis all unpaid fees and expenses allowed pursuant to this Order.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.
5. This Order shall be immediately effective and enforceable upon its entry.

Dated: _____, 2025
Richmond, Virginia

HONORABLE KEITH L. PHILLIPS
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: _____

WE ASK FOR THIS:

CAPLIN & DRYSDALE, CHARTERED

/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*)

1200 New Hampshire Avenue NW, 8th Floor

Washington, DC 20036

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Facsimile: (202) 429-3301

Email: kmaclay@capdale.com

tphillips@capdale.com

jliesemer@capdale.com

nmiller@capdale.com

Counsel to the Official

Committee of Unsecured Creditors

MORGAN, LEWIS & BOCKIUS LLP

Brady Edwards (admitted *pro hac vice*)

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Facsimile: (713) 890-5001

Email: brady.edwards@morganlewis.com

W. Brad Nes (admitted *pro hac vice*)

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Jeffrey S. Raskin (admitted *pro hac vice*)

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San Francisco, CA 94105-1596

Telephone: (415) 442-1000

Facsimile: (415) 442-1001

Email: jeffrey.raskin@morganlewis.com

*Special Insurance Counsel to 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

Morgan Lewis Retention Order

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*)
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Telephone: (202) 862-5000

*Counsel for the Official
Committee of Unsecured Creditors*

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San Francisco, CA 94105-1596
Telephone: (415) 442-1000

*Proposed Special Insurance 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 AUTHORIZING THE RETENTION AND EMPLOYMENT OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
EFFECTIVE NUNC PRO TUNC AS OF JULY 29, 2024**

Upon consideration of the *Application of the Official Committee of Unsecured Creditors to Retain and Employ Morgan, Lewis & Bockius LLP as the Committee’s Special Insurance Counsel, Effective Nunc Pro Tunc as of July 29, 2024* (the “**Application**”),¹ pursuant to sections 105(a), 327(e), 328, and 1103(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 2014 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), rule 2014-1

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

of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Virginia (the “**Local Rules**”), and section VI.F.4 of the Procedures for Complex Chapter 11 Cases in the Eastern District of Virginia, authorizing and approving the employment of Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”) as special insurance counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the above-captioned bankruptcy case of Hopeman Brothers, Inc. (the “**Debtor**”), effective as of July 29, 2024; and upon the declarations of Brady Edwards and Lisa Nathanson Busch filed in support of the Application (the “**Declarations**”); and the Court having jurisdiction to consider the Application and the relief in the Application being a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having reviewed the Application; and the Court having found that Morgan Lewis represents or holds no interest adverse to the Debtor’s estate concerning the matters on which it is employed; and the Court having determined that the relief requested in the Application is in the best interests of the Debtor’s estate, its creditors and other parties in interest; and the Committee having provided adequate and appropriate notice of the Application under the circumstances and no other or further notice of the Application need be provided; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED** as set forth herein.
2. Objections, if any, to the relief requested in the Application that have not been withdrawn or resolved by this Order are overruled in all respects.
3. Pursuant to sections 105(a), 327(e), 328(a), and 1103(b) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, the Committee is authorized to employ and retain

Morgan Lewis as special insurance counsel under the terms and conditions set forth in the Application and the Declarations effective as of July 29, 2024.

4. The terms and conditions of the retention of Morgan Lewis set forth in the Application and in the Declarations are reasonable, and Morgan Lewis shall be compensated in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures and orders of the Court.

5. Morgan Lewis intends to make a reasonable effort to comply with the U.S. Trustee’s requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filing under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, both in connection with the Application and the interim and final fee applications filed by Morgan Lewis in the course of its engagement.

6. The Committee and Morgan Lewis are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

7. Notwithstanding any provision in the Bankruptcy Code or the Bankruptcy Rules to the contrary, this Order shall be effective and enforceable immediately upon entry.

8. This Court shall retain exclusive jurisdiction with respect to the enforcement, implementation or interpretation of this Order.

Oct 4 2024

Dated: _____, 2024
Richmond, Virginia

/s/ Keith L Phillips
HONORABLE KEITH L. PHILLIPS
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: Oct 4 2024

WE ASK FOR THIS:

CAPLIN & DRYSDALE, CHARTERED

/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*)
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jliesemer@capdale.com
nmiller@capdale.com

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Telephone: (415) 442-1000
Facsimile: (415) 442-1001
Email: jeffrey.raskin@morganlewis.com

*Proposed Special Insurance Counsel to the
Official Committee of Unsecured Creditors*

SEEN AND NO OBJECTION:

/s/ Kathryn Montgomery
Kathryn Montgomery
Office of the United States Trustee
701 East Broad Street
Suite 4304
Richmond, VA 23219

United States Trustee

**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 B

Invoices

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

MORGAN, LEWIS & BOCKIUS LLP
 Brady Edwards (admitted *pro hac vice*)
 1000 Louisiana Street, Suite 4000
 Houston, TX 77002-5006
 Telephone: (713) 890-5000

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 Telephone: (415) 442-1000

Special Insurance 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
 MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL
 INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
 SERVICE RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD OF JUNE 1, 2025 THROUGH JUNE 30, 2025**

Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Time Period Covered:	June 1, 2025 through June 30, 2025
Total Fees Requested:	\$106,149.20 (80% of \$132,686.50)
Total Expenses Requested:	\$3,042.95

Type of Fee Statement:	Monthly ¹
------------------------	----------------------

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 [Docket No. 162] (the “**Interim Compensation Order**”), Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) for the reasonable and necessary legal services rendered by Morgan Lewis for the period June 1, 2025 through June 30, 2025 (the “**Fee Period**”) and reimbursement of the actual and necessary expenses that Morgan Lewis incurred during the Fee Period. By this Monthly Fee Statement, Morgan Lewis seeks payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$109,192.15, consisting of (i) \$106,149.20, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$3,042.95 for actual and necessary costs and expenses.

Itemization of Services Rendered and Disbursement Incurred

1. In support of this Monthly Fee Statement, Morgan Lewis has attached the following:
 - a. **Exhibit A** is a summary of schedule of hours and fees covered by this Monthly Fee Statement, categorized by project code.

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 set forth in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.

- b. **Exhibit B** is a summary schedule of the time expended by all Morgan Lewis professionals and paraprofessionals engaged in the representation of the Committee during the Fee Period.
- c. **Exhibit C** is a summary of the expenses incurred by Morgan Lewis during the Fee Period.
- d. **Exhibit D** includes detailed invoices for the hours expended and fees incurred by Morgan Lewis professionals and paraprofessionals during the Fee Period.

Representations

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

Notice

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

[Remainder of page left blank]

WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$109,192.15, consisting of (i) \$106,149.20, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$3,042.95 for actual and necessary costs and expenses.

Dated: July 23 2025

By: /s/ Brady Edwards
Brady Edwards
MORGAN, LEWIS & BOCKIUS LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5006
Telephone: (713) 890-5000
Email: brady.edwards@morganlewis.com

ELECTRONICALLY FILED BY:

/s/ Jeffrey A. Liesemer
CAPLIN & DRYSDALE, CHARTERED
Jeffrey A. Liesemer (VSB No. 35918)
1200 New Hampshire Avenue, NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000
Email: jliesemer@capdale.com

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

Task Code	Matter Description	Hours	Fees Requested
00	General	29.00	\$41,860.00
07	Fee Application – Self	2.50	\$2,357.50
10	Litigation	8.00	\$10,996.50
11	Plan & Disclosure Statement	55.90	\$76,697.50
15	Committee Meetings/Conferences	0.50	\$775.00
TOTAL		95.90	\$132,686.50

EXHIBIT B

Professionals Rendering Services During the Fee Period

The Morgan Lewis attorneys who rendered professional services in this chapter 11 case during the Fee Period include:

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S.	Partner	1995	Litigation	\$1,375.00	62.20	\$85,525.00
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	0.80	\$1,620.00
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	26.50	\$41,075.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	1.90	\$1,615.00
Shim, David	Associate	2016	Finance	\$1,100.00	0.90	\$990.00
				Total	92.30	\$130,825.00

The Morgan Lewis paraprofessionals who rendered professional services in this chapter 11 case during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Chirozzi, Melody	Paralegal	Litigation	\$480.00	0.30	\$144.00
Guzzi, Tiffany A.	Paralegal	Litigation	\$520.00	3.00	\$1,560.00
Vest, John A.	Paralegal	Litigation	\$525.00	0.30	\$157.50
			Total	3.60	\$1,861.50

EXHIBIT C

Summary of Expenses Incurred During the Fee Period

Type	Expenses
Data Services – R	\$1,740.20
Westlaw	\$922.75
User Fees (Monthly) – Relativity	\$380.00
Total	\$3,042.95

EXHIBIT D

Invoices

Morgan Lewis

Morgan, Lewis & Bockius LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5005
T +1.713.890.5000
F +1.713.890.5001
www.morganlewis.com
Fed Tax ID: 23-0891050

Invoice Date: July 21, 2025
Invoice Number 5717121
Account No. 139505-0001

Hopeman Brothers, Inc.
c/o Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Attn: Tyler P. Brown and Henry P. (Toby) Long, III
Richmond, VA 23219

Summary of Services for the period ended June 30, 2025:

Re: Hopeman Creditors Committee

Fees	\$	132,686.50
Disbursements	\$	3,042.95
Total Current Period Charges	\$	135,729.45

Please refer to the table titled "**Detail of Outstanding Invoices**" which lists all other outstanding invoices for the matters referenced on this invoice.

Morgan Lewis

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Houston, TX 77002-5005
T +1.713.890.5000
F +1.713.890.5001
www.morganlewis.com
Fed Tax ID: 23-0891050

Invoice Date: July 21, 2025
Invoice Number 5717121
Account No. 139505-0001

REMITTANCE COPY

Hopeman Brothers, Inc.
c/o Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Attn: Tyler P. Brown and Henry P. (Toby) Long, III
Richmond, VA 23219

Summary of Services for the period ended June 30, 2025:

Re: Hopeman Creditors Committee

Fees	\$	132,686.50
Disbursements	\$	3,042.95
Total Current Period Charges	\$	135,729.45

Please reference account and/or invoice number(s) on your remittance.

<p>Please send your remittance to: Morgan, Lewis & Bockius LLP P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050</p>	<p>Or please wire your remittance to: Wells Fargo Bank, N.A. ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S</p>	<p>For ACH transfers: ABA# 031000503 Acct# 2100010985563 Reference account number</p> <p>Remittance detail address cashapplication@morganlewis.com</p>
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Morgan Lewis

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 1000 Louisiana Street, Suite 4000
 Houston, TX 77002-5005
 T +1.713.890.5000
 F +1.713.890.5001
 www.morganlewis.com
 Fed Tax ID: 23-0891050

Detail of Outstanding Invoices

The following table shows all other outstanding invoices for the matters being billed on this invoice.

Invoice Date	Invoice Number	Invoice Amount	Payments/Credits	Days Outstanding	Balance Due
10/18/24	5530494	238,023.66	1,700.00	276	236,323.66
11/15/24	5552180	309,570.64	1,700.00	248	307,870.64
12/13/24	5570374	438,370.93	1,700.00	220	436,670.93
01/10/25	5588017	84,074.65	1,166.66	192	82,907.99
02/14/25	5608788	153,188.36	1,166.67	157	152,021.69
03/17/25	5623718	103,323.58	1,166.67	126	102,156.91
04/21/25	5644658	111,073.06	0.00	91	111,073.06
05/13/25	5664512	51,054.70	0.00	69	51,054.70
06/16/25	5688180	68,465.80	0.00	35	68,465.80
TOTAL OUTSTANDING					\$ 1,548,545.38

Please reference account and/or invoice number(s) on your remittance.

Please send your remittance to: Morgan, Lewis & Bockius LLP P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050	Or please wire your remittance to: Wells Fargo Bank, N.A. ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S	For ACH transfers: ABA# 031000503 Acct# 2100010985563 Reference account number Remittance detail address cashapplication@morganlewis.com
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Morgan Lewis

July 21, 2025
Page 1

Invoice Number 5717121
Account No. 139505-0001

Detail for Fee Services Rendered

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
06/01/25	00	General	Communications concerning various litigation issues.	Raskin, J. S.	1,550.00	1.20	1,860.00
06/02/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/02/25	00	General	Conference concerning Reorganized Hopeman.	Raskin, J. S.	1,550.00	0.60	930.00
06/02/25	00	General	Conference concerning certain litigation matters.	Raskin, J. S.	1,550.00	1.00	1,550.00
06/03/25	15	Committee Meetings/Conferences	Attend Committee meeting.	Raskin, J. S.	1,550.00	0.50	775.00
06/03/25	00	General	Communications concerning certain state insurance statutes of note.	Raskin, J. S.	1,550.00	0.80	1,240.00
06/04/25	11	Plan & Disclosure Statement	Prepare for and conduct videoconference with Committee and Debtor counsel and FTI regarding Liquidation analysis.	Cox, D.S.	1,375.00	1.60	2,200.00
06/04/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/05/25	11	Plan & Disclosure Statement	Analyze revised schedules, confer with Committee counsel regarding same and telephone conference with T. Long regarding same.	Cox, D.S.	1,375.00	0.70	962.50
06/05/25	10	Litigation	Analyze correspondence with team regarding strategy for next steps.	Edwards, B.	2,025.00	0.40	810.00
06/05/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00

Morgan Lewis

July 21, 2025
Page 2

Invoice Number 5717121
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
06/05/25	00	General	Prepare motion to dismiss Liberty Mutual's adversary complaint.	Raskin, J. S.	1,550.00	4.70	7,285.00
06/05/25	00	General	Communications concerning Liberty Mutual's adversary complaint.	Raskin, J. S.	1,550.00	0.80	1,240.00
06/06/25	10	Litigation	Prepare policy schedule of non-settled policies per D. Cox.	Chirozzi, M. A	480.00	0.30	144.00
06/06/25	10	Litigation	Confer with M. Chirozzi regarding discovery responses (.3), telephone conference with P. Santelle regarding litigation and settlement issues (.4) and analyze draft of motion to dismiss prepared by J. Raskin (.7).	Cox, D.S.	1,375.00	1.40	1,925.00
06/06/25	00	General	Evaluate case pleadings and hearing notice.	Guzzi, T. A.	520.00	0.20	104.00
06/06/25	00	General	Communications concerning contents of plan supplement.	Raskin, J. S.	1,550.00	0.80	1,240.00
06/06/25	00	General	Preparation of motion to dismiss Liberty Mutual's adversary complaint.	Raskin, J. S.	1,550.00	4.50	6,975.00
06/08/25	10	Litigation	Analyze draft discovery responses.	Cox, D.S.	1,375.00	0.40	550.00
06/08/25	00	General	Prepare revisions to responses to Liberty Mutual's written discovery.	Raskin, J. S.	1,550.00	2.40	3,720.00
06/09/25	10	Litigation	Analyze draft discovery responses to insurer discovery and analysis of Liberty response to claim objection.	Cox, D.S.	1,375.00	0.90	1,237.50

Morgan Lewis

July 21, 2025
Page 3

Invoice Number 5717121
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
06/09/25	07	Fee Applications - Self	Correspond with MLB working group regarding exhibits to monthly fee statement.	Shim, D. K.	1,100.00	0.20	220.00
06/10/25	10	Litigation	Revise responses to Liberty discovery (.8), revise motion to dismiss Liberty complaint (1.0) , prepare notes for Tully preparation (2.1).	Cox, D.S.	1,375.00	3.90	5,362.50
06/10/25	00	General	Prepare revisions and additions to motion to dismiss Liberty Mutual's adversary proceeding.	Raskin, J. S.	1,550.00	2.00	3,100.00
06/11/25	11	Plan & Disclosure Statement	Analyze revised discovery responses and document production (1.0), prepare for and participate in videoconferences with C. Tully and D. Salzman regarding plan confirmation (1.9) and related correspondence exchanged with Caplin team regarding same (.5).	Cox, D.S.	1,375.00	3.40	4,675.00
06/11/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/11/25	00	General	Analysis and comment on discovery responses.	Raskin, J. S.	1,550.00	0.50	775.00
06/11/25	10	Litigation	Prepare materials regarding Hopeman Confidentiality Agreement for production to counsel.	Vest, J.A.	525.00	0.30	157.50

Morgan Lewis

July 21, 2025
Page 4

Invoice Number 5717121
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
06/12/25	11	Plan & Disclosure Statement	Analyze and revise response to Travelers discovery (.8) and exchange correspondence with Caplin and MLB teams regarding same (.5).	Cox, D.S.	1,375.00	1.30	1,787.50
06/12/25	07	Fee Applications - Self	Provide comments to draft fee statement.	DeSantis, C. M.	850.00	0.40	340.00
06/12/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/12/25	00	General	Analysis and comment on responses to discovery.	Raskin, J. S.	1,550.00	0.80	1,240.00
06/13/25	07	Fee Applications - Self	Provide comments to draft fee statement.	DeSantis, C. M.	850.00	0.40	340.00
06/13/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/16/25	11	Plan & Disclosure Statement	Exchange correspondence with N. Miller regarding status and strategy (.4) and analyze plan documents (.4).	Cox, D.S.	1,375.00	0.80	1,100.00
06/16/25	07	Fee Applications - Self	Revise fee application materials.	Cox, D.S.	1,375.00	0.30	412.50
06/16/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/16/25	00	General	Analysis and comment on revisions to the motion to dismiss the Liberty Mutual adversary complaint.	Raskin, J. S.	1,550.00	0.60	930.00
06/17/25	11	Plan & Disclosure Statement	Analyze and revise motion to dismiss Liberty complaint (1.3) and analyze "emergency" Chubb filing (.5).	Cox, D.S.	1,375.00	1.80	2,475.00
06/17/25	07	Fee Applications - Self	Follow up with UST regarding LEDES files.	DeSantis, C. M.	850.00	0.20	170.00

Morgan Lewis

July 21, 2025
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Invoice Number 5717121
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
06/17/25	07	Fee Applications - Self	Review and revise monthly fee statement.	DeSantis, C. M.	850.00	0.50	425.00
06/17/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/17/25	00	General	Prepare revision to the motion to dismiss the Liberty Mutual adversary proceeding.	Raskin, J. S.	1,550.00	0.50	775.00
06/18/25	11	Plan & Disclosure Statement	Prepare for (.5) and attend omnibus hearing (2.3) and confer with Caplin team regarding same (.3); and prepare for meet and confer session with Chubb and Travelers (.7).	Cox, D.S.	1,375.00	3.80	5,225.00
06/18/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
06/19/25	11	Plan & Disclosure Statement	Prepare for (1.5) and conduct meet and confer call with Chubb and Travelers (.4), outline supplemental discovery responses (.6) and analyze Liberty 30(b)(6) notice and related internal correspondence regarding same (.4).	Cox, D.S.	1,375.00	2.90	3,987.50
06/19/25	00	General	Conference with Committee counsel concerning discovery disputes and plan confirmation.	Raskin, J. S.	1,550.00	1.00	1,550.00

Morgan Lewis

July 21, 2025
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Invoice Number 5717121
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
06/20/25	11	Plan & Disclosure Statement	Prepare for and conduct videoconference with Hopeman counsel regarding confirmation strategy (1.3), prepare for and conduct videoconference with C. Tully regarding deposition (1.2) and prepare supplement discovery responses (1.2).	Cox, D.S.	1,375.00	3.70	5,087.50
06/20/25	00	General	Conference concerning insurance issues.	Raskin, J. S.	1,550.00	0.50	775.00
06/20/25	07	Fee Applications - Self	Correspond with C. Desantis regarding May monthly fee statement.	Shim, D. K.	1,100.00	0.10	110.00
06/22/25	11	Plan & Disclosure Statement	Prepare supplemental discovery (2.2), analyze draft motion to quash (.4) and exchange correspondence with Caplin team regarding same (.4).	Cox, D.S.	1,375.00	3.00	4,125.00
06/23/25	11	Plan & Disclosure Statement	Prepare for and conduct meeting with FTI team regarding Tully prep and supplementation of discovery.	Cox, D.S.	1,375.00	3.40	4,675.00
06/23/25	07	Fee Applications - Self	Follow up with UCC counsel regarding monthly fee statement.	DeSantis, C. M.	850.00	0.10	85.00
06/23/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/23/25	00	General	Review and comment on motion to quash Liberty's deposition notice (0.4); review and comment on revised discovery responses (0.6).	Raskin, J. S.	1,550.00	1.00	1,550.00

Morgan Lewis

July 21, 2025
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Invoice Number 5717121
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
06/24/25	11	Plan & Disclosure Statement	Analyze potential discovery supplementation, confer with Caplin team regarding same and prepare examination outline for C. Tully.	Cox, D.S.	1,375.00	5.30	7,287.50
06/24/25	07	Fee Applications - Self	Correspondence with MLB working group regarding monthly fee statement.	DeSantis, C. M.	850.00	0.20	170.00
06/24/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
06/24/25	00	General	Internal communications concerning Liberty's deposition notice.	Raskin, J. S.	1,550.00	0.40	620.00
06/25/25	11	Plan & Disclosure Statement	Analyze supplemental discovery, prepare for and meet with C. Tully and confer with Caplin team regarding 30(b)(6) deposition notice.	Cox, D.S.	1,375.00	4.70	6,462.50
06/25/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/25/25	00	General	Review and comment on current version of supplemented interrogatory response.	Raskin, J. S.	1,550.00	0.40	620.00
06/25/25	11	Plan & Disclosure Statement	Analyze proposed plan and disclosure statement.	Shim, D. K.	1,100.00	0.30	330.00
06/25/25	11	Plan & Disclosure Statement	Correspond with MLB working group regarding proposed plan and disclosure statement.	Shim, D. K.	1,100.00	0.30	330.00
06/26/25	11	Plan & Disclosure Statement	Prepare for Tully deposition and analysis and preparation for 30(b)(6) deposition of Committee.	Cox, D.S.	1,375.00	5.50	7,562.50

Morgan Lewis

July 21, 2025
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Invoice Number 5717121
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
06/26/25	07	Fee Applications - Self	Follow up with UCC regarding monthly fee statement.	DeSantis, C. M.	850.00	0.10	85.00
06/26/25	00	General	Attend Conner Tully deposition preparation session.	Raskin, J. S.	1,550.00	1.50	2,325.00
06/27/25	11	Plan & Disclosure Statement	Prepare for and attend Tully deposition and related follow-up.	Cox, D.S.	1,375.00	7.40	10,175.00
06/27/25	10	Litigation	Analyze discovery and privilege log issues to formulate strategy for same.	Edwards, B.	2,025.00	0.40	810.00
06/27/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
06/29/25	11	Plan & Disclosure Statement	Prepare email correspondence to Caplin and Hunton teams regarding status and strategy (1.4) and prepare for session with T. Branham (.4).	Cox, D.S.	1,375.00	1.80	2,475.00
06/30/25	11	Plan & Disclosure Statement	Prepare for 30(b)(6) depositions of Committee and debtor.	Cox, D.S.	1,375.00	4.20	5,775.00
Matter Total						95.90	\$ 132,686.50

Morgan Lewis

July 21, 2025
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Invoice Number 5717121
Account No. 139505-0001

Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	62.20	1,375.00	85,525.00
Edwards, B.	0.80	2,025.00	1,620.00
Raskin, J. S.	26.50	1,550.00	41,075.00
ASSOCIATE			
DeSantis, C. M.	1.90	850.00	1,615.00
Shim, D. K.	0.90	1,100.00	990.00
PARALEGAL			
Guzzi, T. A.	3.00	520.00	1,560.00
Vest, J.A.	0.30	525.00	157.50
COVERAGE SPECIALIST			
Chirozzi, M. A	0.30	480.00	144.00
Matter Total		95.90	\$ 132,686.50

Morgan Lewis

July 21, 2025
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Invoice Number 5717121
Account No. 139505-0001

Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
06/24/25	Cox, David S	WestLaw	\$ 792.50
06/29/25	Cox, David S	WestLaw	\$ 130.25
06/30/25	Data Services, Data Services	Data Services Active - R fee; June; 87.01 GB	\$ 1,740.20
06/30/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; June; 4.00 User	\$ 380.00
Total Disbursements			\$ 3,042.95

Morgan Lewis

July 21, 2025
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Invoice Number 5717121
Account No. 139505-0001

Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Legal Research	922.75
Hosting	1,740.20
User Fees	380.00
<hr/>	
Total Disbursements	\$ 3,042.95
<hr/> <hr/>	

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

MORGAN, LEWIS & BOCKIUS LLP
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 1000 Louisiana Street, Suite 4000
 Houston, TX 77002-5006
 Telephone: (713) 890-5000

W. Brad Nes (admitted *pro hac vice*)
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 Dallas, TX 75201-7347
 Telephone: (214) 466-4000

Jeffrey S. Raskin (admitted *pro hac vice*)
 One Market, Spear Street Tower, 28th Floor
 San Francisco, CA 94105-1596
 Telephone: (415) 442-1000

Special Insurance 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
 MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL
 INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
 SERVICE RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD OF JULY 1, 2025 THROUGH JULY 31, 2025**

Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Time Period Covered:	July 1, 2025 through July 31, 2025
Total Fees Requested:	\$124,012.40 (80% of \$155,015.50)
Total Expenses Requested:	\$5,468.65

Type of Fee Statement:	Monthly ¹
------------------------	----------------------

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 [Docket No. 162] (the “**Interim Compensation Order**”), Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) for the reasonable and necessary legal services rendered by Morgan Lewis for the period July 1, 2025 through July 31, 2025 (the “**Fee Period**”) and reimbursement of the actual and necessary expenses that Morgan Lewis incurred during the Fee Period. By this Monthly Fee Statement, Morgan Lewis seeks payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$129,481.05, consisting of (i) \$124,012.40, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$5,468.65 for actual and necessary costs and expenses.

Itemization of Services Rendered and Disbursement Incurred

1. In support of this Monthly Fee Statement, Morgan Lewis has attached the following:
 - a. **Exhibit A** is a summary of schedule of hours and fees covered by this Monthly Fee Statement, categorized by project code.

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 set forth in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.

- b. **Exhibit B** is a summary schedule of the time expended by all Morgan Lewis professionals and paraprofessionals engaged in the representation of the Committee during the Fee Period.
- c. **Exhibit C** is a summary of the expenses incurred by Morgan Lewis during the Fee Period.
- d. **Exhibit D** includes detailed invoices for the hours expended and fees incurred by Morgan Lewis professionals and paraprofessionals during the Fee Period.

Representations

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

Notice

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

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WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$129,481.05, consisting of (i) \$124,012.40, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$5,468.65 for actual and necessary costs and expenses.

Dated: August 28, 2025

By: /s/ Brady Edwards
Brady Edwards
MORGAN, LEWIS & BOCKIUS LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5006
Telephone: (713) 890-5000
Email: brady.edwards@morganlewis.com

ELECTRONICALLY FILED BY:

/s/ Jeffrey A. Liesemer
CAPLIN & DRYSDALE, CHARTERED
Jeffrey A. Liesemer (VSB No. 35918)
1200 New Hampshire Avenue, NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000
Email: jliesemer@capdale.com

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

Task Code	Matter Description	Hours	Fees Requested
00	General	12.20	\$16,438.00
07	Fee Application – Self	9.70	\$9,072.50
10	Litigation	0.30	\$607.50
11	Plan & Disclosure Statement	92.00	\$128,897.50
<u>TOTAL</u>		<u>114.20</u>	<u>\$155,015.50</u>

EXHIBIT B

Professionals Rendering Services During the Fee Period

The Morgan Lewis attorneys who rendered professional services in this chapter 11 case during the Fee Period include:

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S.	Partner	1995	Litigation	\$1,375.00	79.40	\$109,175.00
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	0.30	\$607.50
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	23.50	\$36,425.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	7.60	\$6,460.00
Shim, David	Associate	2016	Finance	\$1,100.00	1.00	\$1,100.00
				Total	111.80	\$153,767.50

The Morgan Lewis paraprofessionals who rendered professional services in this chapter 11 case during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Guzzi, Tiffany A.	Paralegal	Litigation	\$520.00	2.40	\$1,248.00
			Total	2.40	\$1,248.00

EXHIBIT C

Summary of Expenses Incurred During the Fee Period

Type	Expenses
Air	\$55.00
User Fees (Monthly) – Relativity	\$380.00
Court Transcripts	\$2,480.96
Duplicating	\$378.24
Data Services Active – R	\$1,740.20
Westlaw	\$434.25
<u>Total</u>	\$5,468.65

EXHIBIT D

Invoices

Morgan Lewis

Morgan, Lewis & Bockius LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5005
T +1.713.890.5000
F +1.713.890.5001
www.morganlewis.com
Fed Tax ID: 23-0891050

Invoice Date: August 13, 2025
Invoice Number 5731026
Account No. 139505-0001

Hopeman Brothers, Inc.
c/o Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Attn: Tyler P. Brown and Henry P. (Toby) Long, III
Richmond, VA 23219

Summary of Services for the period ended July 31, 2025:

Re: Hopeman Creditors Committee

Fees	\$	155,015.50
Disbursements	\$	5,468.65
Total Current Period Charges	\$	160,484.15

Please refer to the table titled "**Detail of Outstanding Invoices**" which lists all other outstanding invoices for the matters referenced on this invoice.

As our fiscal year will close on September 30, 2025, your payment prior to that date would be most appreciated.

Morgan Lewis

Morgan, Lewis & Bockius LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5005
T +1.713.890.5000
F +1.713.890.5001
www.morganlewis.com
Fed Tax ID: 23-0891050

Invoice Date: August 13, 2025
Invoice Number 5731026
Account No. 139505-0001

REMITTANCE COPY

Hopeman Brothers, Inc.
c/o Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Attn: Tyler P. Brown and Henry P. (Toby) Long, III
Richmond, VA 23219

Summary of Services for the period ended July 31, 2025:

Re: Hopeman Creditors Committee

Fees	\$	155,015.50
Disbursements	\$	5,468.65
Total Current Period Charges	\$	160,484.15

Please reference account and/or invoice number(s) on your remittance.

<p>Please send your remittance to: Morgan, Lewis & Bockius LLP P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050</p>	<p>Or please wire your remittance to: Wells Fargo Bank, N.A. ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S</p>	<p>For ACH transfers: ABA# 031000503 Acct# 2100010985563 Reference account number</p> <p>Remittance detail address cashapplication@morganlewis.com</p>
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Morgan Lewis

Morgan, Lewis & Bockius LLP
 1000 Louisiana Street, Suite 4000
 Houston, TX 77002-5005
 T +1.713.890.5000
 F +1.713.890.5001
 www.morganlewis.com
 Fed Tax ID: 23-0891050

Detail of Outstanding Invoices

The following table shows all other outstanding invoices for the matters being billed on this invoice.

Invoice Date	Invoice Number	Invoice Amount	Payments/Credits	Days Outstanding	Balance Due
04/21/25	5644658	111,073.06	0.00	126	111,073.06
05/13/25	5664512	51,054.70	0.00	104	51,054.70
06/16/25	5688180	68,465.80	0.00	70	68,465.80
07/21/25	5717121	135,729.45	0.00	35	135,729.45
TOTAL OUTSTANDING					\$366,323.01

Please reference account and/or invoice number(s) on your remittance.

Please send your remittance to: Morgan, Lewis & Bockius LLP P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050	Or please wire your remittance to: Wells Fargo Bank, N.A. ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S	For ACH transfers: ABA# 031000503 Acct# 2100010985563 Reference account number Remittance detail address cashapplication@morganlewis.com
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Morgan Lewis

August 13, 2025
Page 1

Invoice Number 5731026
Account No. 139505-0001

Detail for Fee Services Rendered

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
07/01/25	11	Plan & Disclosure Statement	Prepare for and attend Hopeman 30(b)(6) deposition (5.2), analyze Tully transcript and correspondence to M. Carolan regarding same (2.0), prepare for preparation session with T. Branham (1.5) and revise objections to 30(b)(6) notice (.6).	Cox, D.S.	1,375.00	9.30	12,787.50
07/02/25	11	Plan & Disclosure Statement	Prepare for and attend prep session with T. Branham (2.4), prepare for and attend meeting with debtor's counsel regarding case strategy (1.3), confer with Caplin team regarding case strategy (.7).	Cox, D.S.	1,375.00	4.40	6,050.00
07/02/25	10	Litigation	Telephone conferences and communication with David Cox and Trey Branham (Dean Omar) regarding preparations for upcoming deposition.	Edwards, B.	2,025.00	0.30	607.50
07/03/25	11	Plan & Disclosure Statement	Prepare for and attend 30(b)(6) deposition (3.0), analyze Tully errata, confer with C. Tully regarding same and correspondence to Chubb counsel regarding same (1.3), analyze and revise briefing regarding Liberty Mutual suit (1.9).	Cox, D.S.	1,375.00	6.20	8,525.00

Morgan Lewis

August 13, 2025
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Invoice Number 5731026
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
07/04/25	07	Fee Applications - Self	Follow up with UCC counsel regarding comments to draft monthly fee statement.	DeSantis, C. M.	850.00	0.10	85.00
07/05/25	11	Plan & Disclosure Statement	Analyze Branham transcript and correspondence to T. Branham regarding same (1.0) and analyze Wellington agreement and correspondence to debtor counsel regarding same (1.2).	Cox, D.S.	1,375.00	2.20	3,025.00
07/05/25	00	General	Internal communications concerning Wellington insurers.	Raskin, J. S.	1,550.00	0.40	620.00
07/06/25	11	Plan & Disclosure Statement	Analyze correspondence from M. Carolan regarding Tully errata.	Cox, D.S.	1,375.00	0.30	412.50
07/07/25	11	Plan & Disclosure Statement	Confer with Caplin team regarding treatment of Wellington agreement (.5) analyze insurer plan objections (2.3).	Cox, D.S.	1,375.00	2.80	3,850.00
07/07/25	07	Fee Applications - Self	Revise and finalize monthly fee statement.	DeSantis, C. M.	850.00	0.30	255.00
07/07/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00

Morgan Lewis

August 13, 2025
Page 3

Invoice Number 5731026
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
07/08/25	11	Plan & Disclosure Statement	Prepare for and meet with Conor Tully regarding deposition corrections (1.3); analyze draft exhibit and witness lists and confer with Caplin team regarding same (.4); prepare for and conduct videoconference with debtor counsel and Caplin team regarding insurer objections (1.5); analyze insurer objections and supporting materials (3.6).	Cox, D.S.	1,375.00	6.80	9,350.00
07/08/25	07	Fee Applications - Self	Correspond with J. Ellett regarding interim fee application.	DeSantis, C. M.	850.00	0.10	85.00
07/08/25	07	Fee Applications - Self	Draft fourth interim fee application.	DeSantis, C. M.	850.00	1.70	1,445.00
07/08/25	00	General	Evaluate case pleadings and notices of hearing.	Guzzi, T. A.	520.00	0.30	156.00
07/08/25	00	General	Analysis and comment concerning the Wellington Agreement and certain plan objections.	Raskin, J. S.	1,550.00	1.10	1,705.00
07/09/25	11	Plan & Disclosure Statement	Analyze draft brief responding to insurer objections (2.5), prepare for and conduct various videoconferences with debtor, committee and insurer counsel regarding plan objections and confirmation hearing (3.7), analyze insurer briefing and supporting materials in connection with same (1.0).	Cox, D.S.	1,375.00	7.20	9,900.00

Morgan Lewis

August 13, 2025
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Invoice Number 5731026
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
07/09/25	07	Fee Applications - Self	Correspondence with MLB personnel regarding preparation of interim fee application (.5); telephone conference with J. Ellet regarding same (.2).	DeSantis, C. M.	850.00	0.70	595.00
07/09/25	07	Fee Applications - Self	Correspondence with D. Shim and UCC counsel regarding interim fee pp.	DeSantis, C. M.	850.00	0.30	255.00
07/09/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
07/09/25	00	General	Analyses and comments concerning current version of brief in support of plan confirmation.	Raskin, J. S.	1,550.00	2.80	4,340.00
07/09/25	07	Fee Applications - Self	Analyze MLB's fee application.	Shim, D. K.	1,100.00	0.30	330.00
07/09/25	07	Fee Applications - Self	Correspond with MLB working group regarding MLB's fee application.	Shim, D. K.	1,100.00	0.20	220.00
07/10/25	07	Fee Applications - Self	Analyze and revise fee application.	Cox, D.S.	1,375.00	0.30	412.50
07/10/25	11	Plan & Disclosure Statement	Analyze and confer with debtor and committee counsel regarding witness lists. exhibit lists and case scheduling issues.	Cox, D.S.	1,375.00	0.60	825.00
07/10/25	07	Fee Applications - Self	Follow up with UST regarding monthly fee application.	DeSantis, C. M.	850.00	0.30	255.00
07/10/25	00	General	Analysis and comment concerning certain plan objections.	Raskin, J. S.	1,550.00	2.30	3,565.00
07/10/25	07	Fee Applications - Self	Correspond with MLB working group regarding MLB's fee application.	Shim, D. K.	1,100.00	0.50	550.00

Morgan Lewis

August 13, 2025
Page 5

Invoice Number 5731026
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
07/11/25	11	Plan & Disclosure Statement	Analyze legal issues raised by insurers in their plan objections and confer with Caplin team regarding same.	Cox, D.S.	1,375.00	2.90	3,987.50
07/11/25	07	Fee Applications - Self	Revise interim fee application.	DeSantis, C. M.	850.00	1.00	850.00
07/11/25	00	General	Evaluate case pleadings and amended notices of hearing.	Guzzi, T. A.	520.00	0.30	156.00
07/13/25	11	Plan & Disclosure Statement	Exchange correspondence with C. Tully and counsel regarding Chubb expert report.	Cox, D.S.	1,375.00	0.20	275.00
07/14/25	07	Fee Applications - Self	Revise fee application.	Cox, D.S.	1,375.00	0.60	825.00
07/14/25	11	Plan & Disclosure Statement	Analyze Travelers objection to Plan.	Cox, D.S.	1,375.00	2.20	3,025.00
07/14/25	07	Fee Applications - Self	Review revised fee application.	DeSantis, C. M.	850.00	0.40	340.00
07/14/25	07	Fee Applications - Self	Revise fee application and correspond with UCC counsel regarding same.	DeSantis, C. M.	850.00	0.50	425.00
07/14/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
07/15/25	11	Plan & Disclosure Statement	Analyze insurer objections and outline response to same.	Cox, D.S.	1,375.00	1.50	2,062.50
07/16/25	11	Plan & Disclosure Statement	Prepare for and conduct videoconference with Caplin, Hunton and FTI teams regarding Scarcella liquidation analysis and appropriate standards for same.	Cox, D.S.	1,375.00	3.20	4,400.00

Morgan Lewis

August 13, 2025
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Invoice Number 5731026
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
07/16/25	07	Fee Applications - Self	Revise and finalize interim fee application.	DeSantis, C. M.	850.00	1.50	1,275.00
07/16/25	00	General	Evaluate case pleadings and notices regarding motions hearing and depositions.	Guzzi, T. A.	520.00	0.40	208.00
07/16/25	00	General	Analysis and comment on the export report of Marc Scarcella.	Raskin, J. S.	1,550.00	2.20	3,410.00
07/17/25	11	Plan & Disclosure Statement	Analyze draft brief in light of insurer objections and outline areas for supplementation.	Cox, D.S.	1,375.00	2.70	3,712.50
07/17/25	00	General	Evaluate case pleadings and hearing notice.	Guzzi, T. A.	520.00	0.50	260.00
07/18/25	11	Plan & Disclosure Statement	Analyze and revise brief in response to insurer objections.	Cox, D.S.	1,375.00	3.30	4,537.50
07/18/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.30	156.00
07/19/25	11	Plan & Disclosure Statement	Analyze and revise responsive brief to Insurer Objections.	Cox, D.S.	1,375.00	2.80	3,850.00
07/21/25	07	Fee Applications - Self	Attention to Hopeman fee application.	Cox, D.S.	1,375.00	0.20	275.00
07/21/25	11	Plan & Disclosure Statement	Prepare for Scarcella deposition (1.3) and analyze and revise brief in support of plan confirmation (1.2).	Cox, D.S.	1,375.00	2.50	3,437.50
07/21/25	07	Fee Applications - Self	Finalize monthly fee statement.	DeSantis, C. M.	850.00	0.40	340.00
07/21/25	11	Plan & Disclosure Statement	Prepare a round of revisions, additions, suggestions and questions to brief in support of plan confirmation.	Raskin, J. S.	1,550.00	5.30	8,215.00

Morgan Lewis

August 13, 2025
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Invoice Number 5731026
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
07/22/25	11	Plan & Disclosure Statement	Prepare for Scarcella deposition and videoconference with FTI and Hunton teams regarding same (2.0), and analyze and revise brief in support of confirmation (1.5).	Cox, D.S.	1,375.00	3.50	4,812.50
07/22/25	11	Plan & Disclosure Statement	Prepare additional revisions, additions, suggestions and questions concerning the brief in support of plan confirmation.	Raskin, J. S.	1,550.00	1.50	2,325.00
07/22/25	00	General	Preparation session in connection with the deposition of Marc Scarsella.	Raskin, J. S.	1,550.00	1.00	1,550.00
07/23/25	11	Plan & Disclosure Statement	Prepare for and attend Scarcella deposition (4.3), analyze and revise brief in support of confirmation (2.6) and videoconference with Caplin and Hunton teams regarding same (1.0).	Cox, D.S.	1,375.00	7.90	10,862.50
07/23/25	07	Fee Applications - Self	Emails with UCC counsel regarding finalizing monthly fee statement.	DeSantis, C. M.	850.00	0.30	255.00
07/23/25	11	Plan & Disclosure Statement	Analyze and comment on a partial revision to the brief in support of plan confirmation.	Raskin, J. S.	1,550.00	1.50	2,325.00
07/23/25	11	Plan & Disclosure Statement	Conference concerning brief in support of plan confirmation.	Raskin, J. S.	1,550.00	1.00	1,550.00
07/24/25	11	Plan & Disclosure Statement	Analyze and revise brief in support of plan confirmation and videoconference with Caplin and Hunton teams regarding same.	Cox, D.S.	1,375.00	4.20	5,775.00

Morgan Lewis

August 13, 2025
Page 8

Invoice Number 5731026
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
07/24/25	11	Plan & Disclosure Statement	Conference concerning brief in support of plan confirmation.	Raskin, J. S.	1,550.00	1.00	1,550.00
07/24/25	11	Plan & Disclosure Statement	Analysis of further revisions to brief in support of plan confirmation.	Raskin, J. S.	1,550.00	1.40	2,170.00
07/25/25	11	Plan & Disclosure Statement	Revise brief in support of plan and correspondence to Hunton team regarding same.	Cox, D.S.	1,375.00	1.40	1,925.00
07/25/25	11	Plan & Disclosure Statement	Final review of brief in support of plan confirmation.	Raskin, J. S.	1,550.00	1.40	2,170.00
07/27/25	11	Plan & Disclosure Statement	Exchange correspondence with FTI regarding Tully preparation.	Cox, D.S.	1,375.00	0.20	275.00
07/31/25	11	Plan & Disclosure Statement	Analysis and comment on objections to insurers' proposed evidence at hearing on plan confirmation.	Raskin, J. S.	1,550.00	0.60	930.00
Matter Total						114.20	\$ 155,015.50

Morgan Lewis

August 13, 2025
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Invoice Number 5731026
Account No. 139505-0001

Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	79.40	1,375.00	109,175.00
Edwards, B.	0.30	2,025.00	607.50
Raskin, J. S.	23.50	1,550.00	36,425.00
ASSOCIATE			
DeSantis, C. M.	7.60	850.00	6,460.00
Shim, D. K.	1.00	1,100.00	1,100.00
PARALEGAL			
Guzzi, T. A.	2.40	520.00	1,248.00
Matter Total		114.20	\$ 155,015.50

Morgan Lewis

August 13, 2025
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Invoice Number 5731026
Account No. 139505-0001

Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
07/01/25	Cox, David S	WestLaw	\$ 206.25
07/07/25	Cox, David S	Court Transcripts - Veritext - Certified transcript of Try Branham.	\$ 2,480.96
07/08/25	Cox, David S	Other Duplicating Other Duplicating Print	\$ 172.32
07/08/25	Cox, David S	Other Duplicating Other Duplicating Print	\$ 205.92
07/08/25	Cox, David S	Air SCDDWU : 001 7272555763 : 2025-07-12 - 2025-07-14 : COX/DAVID SEAN-->BURDFWRICPHLLAX : Billable	\$ 852.61
07/11/25	Cox, David S	WestLaw	\$ 228.00
07/12/25	Cox, David S	CREDIT: Air UNUSED : COX/DAVID SEAN : All Open : 0017272555763 : Issued on 2025-07-08 : Expires on 2026-07-08	\$ (797.61)
07/31/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; July; 4.00 User	\$ 380.00
07/31/25	Data Services, Data Services	Data Services Active - R fee; July; 87.01 GB	\$ 1,740.20
Total Disbursements			\$ 5,468.65

Morgan Lewis

August 13, 2025
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Invoice Number 5731026
Account No. 139505-0001

Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Miscellaneous Travel	55.00
Duplicating/Printing	378.24
Filing Fees	2,480.96
Legal Research	434.25
Hosting	1,740.20
User Fees	380.00
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Total Disbursements	\$ 5,468.65
<hr/> <hr/>	

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

MORGAN, LEWIS & BOCKIUS LLP
 Brady Edwards (admitted *pro hac vice*)
 1000 Louisiana Street, Suite 4000
 Houston, TX 77002-5006
 Telephone: (713) 890-5000

W. Brad Nes (admitted *pro hac vice*)
 1717 Main Street, Suite 3200
 Dallas, TX 75201-7347
 Telephone: (214) 466-4000

Jeffrey S. Raskin (admitted *pro hac vice*)
 One Market, Spear Street Tower, 28th Floor
 San Francisco, CA 94105-1596
 Telephone: (415) 442-1000

Special Insurance Counsel for the Official Committee of Unsecured Creditors

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

In re: HOPEMAN BROTHERS, INC., Debtor.
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Chapter 11

Case No. 24-32428 (KLP)

**THIRTEENTH MONTHLY FEE STATEMENT OF
 MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL
 INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
 UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
 SERVICE RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD OF AUGUST 1, 2025 THROUGH AUGUST 31, 2025**

Name of Applicant:	Morgan, Lewis & Bockius LLP
Name of Client:	Official Committee of Unsecured Creditors
Date of Retention Order Entered:	October 4, 2024, effective as of July 29, 2024 [Docket No. 269]
Time Period Covered:	August 1, 2025 through August 31, 2025
Total Fees Requested:	\$152,911.20 (80% of \$191,139.00)
Total Expenses Requested:	\$10,746.65

Type of Fee Statement:	Monthly ¹
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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 [Docket No. 162] (the “**Interim Compensation Order**”), Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”), as special insurance counsel for the Official Committee of Unsecured Creditors (the “**Committee**”) of Hopeman Brothers, Inc. (the “**Debtor**”), hereby submits this monthly fee statement (the “**Monthly Fee Statement**”) for the reasonable and necessary legal services rendered by Morgan Lewis for the period August 1, 2025 through August 31, 2025 (the “**Fee Period**”) and reimbursement of the actual and necessary expenses that Morgan Lewis incurred during the Fee Period. By this Monthly Fee Statement, Morgan Lewis seeks payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$163,657.85, consisting of (i) \$152,911.20, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$10,746.65 for actual and necessary costs and expenses.

Itemization of Services Rendered and Disbursement Incurred

1. In support of this Monthly Fee Statement, Morgan Lewis has attached the following:
 - a. **Exhibit A** is a summary of schedule of hours and fees covered by this Monthly Fee Statement, categorized by project code.

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 set forth in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.

- b. **Exhibit B** is a summary schedule of the time expended by all Morgan Lewis professionals and paraprofessionals engaged in the representation of the Committee during the Fee Period.
- c. **Exhibit C** is a summary of the expenses incurred by Morgan Lewis during the Fee Period.
- d. **Exhibit D** includes detailed invoices for the hours expended and fees incurred by Morgan Lewis professionals and paraprofessionals during the Fee Period.

Representations

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

Notice

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

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WHEREFORE, Morgan Lewis respectfully requests payment of its reasonable and necessary fees and expenses incurred during the Fee Period in the total amount of \$163,657.85, consisting of (i) \$152,911.20, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Morgan Lewis during the Fee Period, and (ii) \$10,746.65 for actual and necessary costs and expenses.

Dated: September 18, 2025

By: /s/ Brady Edwards
Brady Edwards
MORGAN, LEWIS & BOCKIUS LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5006
Telephone: (713) 890-5000
Email: brady.edwards@morganlewis.com

ELECTRONICALLY FILED BY:

/s/ Jeffrey A. Liesemer
CAPLIN & DRYSDALE, CHARTERED
Jeffrey A. Liesemer (VSB No. 35918)
1200 New Hampshire Avenue, NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000
Email: jliesemer@capdale.com

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT A

Statement of Fees by Subject Matter During the Fee Period

Task Code	Matter Description	Hours	Fees Requested
00	General	1.70	\$906.50
04	Case Administration & Calendar Control	4.50	\$1,485.00
07	Fee Application – Self	3.70	\$3,470.00
10	Litigation	58.90	\$87,605.00
11	Plan & Disclosure Statement	65.10	\$91,210.00
16	Travel	4.70	\$6,462.50
TOTAL		114.20	\$191,139.00

EXHIBIT B

Professionals Rendering Services During the Fee Period

The Morgan Lewis attorneys who rendered professional services in this chapter 11 case during the Fee Period include:

Professional	Position	First Bar Date	Section	Hourly Billing Rate	Total Hours Billed	Total Compensation
Cox, David S.	Partner	1995	Litigation	\$1,375.00	76.80	\$105,600.00
Edwards, Brady	Partner	1995	Litigation	\$2,025.00	0.40	\$810.00
Raskin, Jeffrey S.	Partner	1993	Litigation	\$1,550.00	50.40	\$78,120.00
DeSantis, Celine M.	Associate	2022	Finance	\$850.00	2.40	\$2,040.00
Huffman, Jamie	Associate	2019	Litigation	\$1,060.00	0.20	\$212.00
Shim, David	Associate	2016	Finance	\$1,100.00	1.30	\$1,430.00
				Total	131.50	\$188,212.00

The Morgan Lewis paraprofessionals who rendered professional services in this chapter 11 case during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Guzzi, Tiffany A.	Paralegal	Litigation	\$520.00	1.60	\$832.00
McConnell, Heather M.	eData Manager	eData	\$745.00	0.10	\$74.50
Petrucci III, Philip	Practice Technology Manager	Practice Technology	\$595.00	0.90	\$535.50
Young, Helen	Legal Practice Assistant	Litigation	\$330.00	4.50	\$1,485.00
			Total	7.10	\$2,927.00

EXHIBIT C

Summary of Expenses Incurred During the Fee Period

Type	Expenses
Air	\$1,263.21
Court Reporter	\$5,702.17
Data Services Active – R	\$1,740.20
Hotel	\$600.27
Taxi	\$116.30
User Fees (Monthly) Relativity	\$380.00
Westlaw	\$944.50
<u>Total</u>	\$10,746.65

EXHIBIT D

Invoices

Morgan Lewis

Morgan, Lewis & Bockius LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5005
T +1.713.890.5000
F +1.713.890.5001
www.morganlewis.com
Fed Tax ID: 23-0891050

Invoice Date: September 10, 2025
Invoice Number 5751080
Account No. 139505-0001

Hopeman Brothers, Inc.
c/o Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Attn: Tyler P. Brown and Henry P. (Toby) Long, III
Richmond, VA 23219

Summary of Services for the period ended August 31, 2025:

Re: Hopeman Creditors Committee

Fees	\$	191,139.00
Disbursements	\$	10,746.65
Total Current Period Charges	\$	201,885.65

Please refer to the table titled "**Detail of Outstanding Invoices**" which lists all other outstanding invoices for the matters referenced on this invoice.

As our fiscal year will close on September 30, 2025, your payment prior to that date would be most appreciated.

Morgan Lewis

Morgan, Lewis & Bockius LLP
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5005
T +1.713.890.5000
F +1.713.890.5001
www.morganlewis.com
Fed Tax ID: 23-0891050

Invoice Date: September 10, 2025
Invoice Number 5751080
Account No. 139505-0001

REMITTANCE COPY

Hopeman Brothers, Inc.
c/o Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Attn: Tyler P. Brown and Henry P. (Toby) Long, III
Richmond, VA 23219

Summary of Services for the period ended August 31, 2025:

Re: Hopeman Creditors Committee

Fees	\$	191,139.00
Disbursements	\$	10,746.65
Total Current Period Charges	\$	201,885.65

Please reference account and/or invoice number(s) on your remittance.

<p>Please send your remittance to: Morgan, Lewis & Bockius LLP P. O. Box 8500 S-6050 Philadelphia, PA 19178-6050 Federal Tax ID 23-0891050</p>	<p>Or please wire your remittance to: Wells Fargo Bank, N.A. ABA# 121000248 Morgan, Lewis & Bockius LLP Acct# 2100010985563 Swift Code: WFBIUS6S</p>	<p>For ACH transfers: ABA# 031000503 Acct# 2100010985563 Reference account number</p> <p>Remittance detail address cashapplication@morganlewis.com</p>
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Morgan Lewis

September 10, 2025
Page 1

Invoice Number 5751080
Account No. 139505-0001

Detail for Fee Services Rendered

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
08/04/25	10	Litigation	Revise motion to dismiss Chubb FCR appeal and correspondence to Hunton and Caplin teams regarding same.	Cox, D.S.	1,375.00	1.00	1,375.00
08/04/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
08/08/25	11	Plan & Disclosure Statement	Exchange email correspondene with debtor team and J. Raskin regarding Scarcella liquidation analysis.	Cox, D.S.	1,375.00	0.80	1,100.00
08/08/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
08/08/25	11	Plan & Disclosure Statement	Communications concerning issues raised about the Wellington Agreement and coverage-in-place agreements.	Raskin, J. S.	1,550.00	1.20	1,860.00
08/12/25	10	Litigation	Analyze and revise FCR appellate brief.	Cox, D.S.	1,375.00	1.40	1,925.00
08/12/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
08/13/25	11	Plan & Disclosure Statement	Analyze and revise plan documentation and supplemental brief in support of confirmation.	Cox, D.S.	1,375.00	3.00	4,125.00
08/13/25	11	Plan & Disclosure Statement	Communications concerning various plan provisions.	Raskin, J. S.	1,550.00	2.30	3,565.00
08/13/25	07	Fee Applications - Self	Correspond with MLB working group regarding MLB's monthly statement.	Shim, D. K.	1,100.00	0.20	220.00
08/14/25	10	Litigation	Analyze Liberty opposition to motion to dismiss.	Cox, D.S.	1,375.00	1.00	1,375.00

Morgan Lewis

September 10, 2025
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Invoice Number 5751080
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
08/14/25	11	Plan & Disclosure Statement	Revise brief in support of confirmation (4.1) and confer with Debtor counsel regarding same (.9).	Cox, D.S.	1,375.00	5.00	6,875.00
08/14/25	07	Fee Applications - Self	Prepare revised fee order.	DeSantis, C. M.	850.00	0.40	340.00
08/14/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
08/14/25	11	Plan & Disclosure Statement	Communications concerning Plan issues.	Raskin, J. S.	1,550.00	1.20	1,860.00
08/14/25	10	Litigation	Communications concerning Liberty's opposition to the motion to dismiss.	Raskin, J. S.	1,550.00	1.70	2,635.00
08/15/25	10	Litigation	Analyze Liberty case authority and confer with J. Raskin regarding same.	Cox, D.S.	1,375.00	1.00	1,375.00
08/15/25	11	Plan & Disclosure Statement	Prepare for and conduct meeting with C. Tully regarding declaration (1.8) and analyze revised brief in support of plan confirmation (1.0).	Cox, D.S.	1,375.00	2.80	3,850.00
08/15/25	07	Fee Applications - Self	Revise CNO/proposed order regarding third interim fee application.	DeSantis, C. M.	850.00	0.40	340.00
08/15/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
08/15/25	11	Plan & Disclosure Statement	Communications concerning plan issues.	Raskin, J. S.	1,550.00	0.50	775.00
08/15/25	10	Litigation	Prepare reply in support of motion to dismiss Liberty's adversary complaint.	Raskin, J. S.	1,550.00	4.80	7,440.00
08/15/25	07	Fee Applications - Self	Revise Caplin's certificate of counsel and MLB's fee order.	Shim, D. K.	1,100.00	0.50	550.00

Morgan Lewis

September 10, 2025
Page 3

Invoice Number 5751080
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
08/16/25	10	Litigation	Exchange correspondence with J. Raskin regarding reply to Liberty brief regarding motion to dismiss.	Cox, D.S.	1,375.00	0.60	825.00
08/16/25	11	Plan & Disclosure Statement	Analyze and revise supplemental brief in support of plan confirmation.	Cox, D.S.	1,375.00	1.00	1,375.00
08/16/25	10	Litigation	Continue preparation of reply in support of motion to dismiss Liberty's adversary proceeding.	Raskin, J. S.	1,550.00	5.70	8,835.00
08/17/25	10	Litigation	Continue preparation of reply in support of motion to dismiss Liberty's adversary complaint.	Raskin, J. S.	1,550.00	6.20	9,610.00
08/18/25	11	Plan & Disclosure Statement	Revise and finalize supplemental briefing and support declarations and coordinate with MLB, Caplin and Hunton teams regarding same.	Cox, D.S.	1,375.00	4.70	6,462.50
08/18/25	10	Litigation	Revise reply to Liberty.	Cox, D.S.	1,375.00	2.00	2,750.00
08/18/25	07	Fee Applications - Self	Review and provide comments to draft monthly fee statement.	DeSantis, C. M.	850.00	0.50	425.00
08/18/25	10	Litigation	Continue to prepare reply in support of motion to dismiss Liberty's adversary proceeding.	Raskin, J. S.	1,550.00	5.00	7,750.00
08/18/25	11	Plan & Disclosure Statement	Communications concerning certain plan-related issues.	Raskin, J. S.	1,550.00	1.20	1,860.00
08/18/25	10	Litigation	Analyze and comment on confirmation-related declarations as respects insurance issues.	Raskin, J. S.	1,550.00	1.20	1,860.00

Morgan Lewis

September 10, 2025
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Invoice Number 5751080
Account No. 139505-0001

Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
08/18/25	04	Case Administration & Calendar Control	Evaluate case pleadings and notice of deposition.	Young, H.	330.00	0.50	165.00
08/19/25	10	Litigation	Revise Liberty reply brief and confer with J. Raskin regarding same.	Cox, D.S.	1,375.00	0.60	825.00
08/19/25	11	Plan & Disclosure Statement	Analyze exhibits and deposition designations to prepare for confirmation hearing.	Cox, D.S.	1,375.00	2.10	2,887.50
08/19/25	10	Litigation	Attend Committee meeting.	Raskin, J. S.	1,550.00	0.50	775.00
08/19/25	10	Litigation	Prepare revisions to motion to dismiss Liberty's adversary proceeding.	Raskin, J. S.	1,550.00	2.30	3,565.00
08/19/25	10	Litigation	Analyze and comment on insurers' plan confirmation exhibit list.	Raskin, J. S.	1,550.00	0.60	930.00
08/19/25	04	Case Administration & Calendar Control	Evaluate case pleadings and notice of deposition.	Young, H.	330.00	1.00	330.00
08/20/25	10	Litigation	Analyze case authority distinguished by Liberty.	Cox, D.S.	1,375.00	0.30	412.50
08/20/25	11	Plan & Disclosure Statement	Prepare for confirmation hearing and coordinate with Caplin, MLB and Hunton teams regarding same.	Cox, D.S.	1,375.00	7.40	10,175.00
08/20/25	07	Fee Applications - Self	Analyze revised monthly fee statement.	DeSantis, C. M.	850.00	0.30	255.00

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
08/20/25	10	Litigation	Communications concerning certain of the insurers' confirmation hearing exhibits and insurers' comments on contents of confirmation briefs.	Raskin, J. S.	1,550.00	1.20	1,860.00
08/20/25	10	Litigation	Preparation for hearing on motion to dismiss Liberty's adversary proceeding.	Raskin, J. S.	1,550.00	4.50	6,975.00
08/20/25	04	Case Administration & Calendar Control	Evaluate case pleadings and notice of deposition.	Young, H.	330.00	0.50	165.00
08/21/25	10	Litigation	Attend status conference and motion to dismiss hearing (3.0), confer with C. Tully regarding testimony and preparation for prep session with C. Tully (2.0) , prepare for confirmation hearing and coordinate with Hunton and Caplin teams regarding same (3.5).	Cox, D.S.	1,375.00	8.50	11,687.50
08/21/25	07	Fee Applications - Self	Correspondence with N. Miller regarding monthly fee statement.	DeSantis, C. M.	850.00	0.20	170.00
08/21/25	07	Fee Applications - Self	Follow up with D. Cox regarding monthly fee statement.	DeSantis, C. M.	850.00	0.20	170.00
08/21/25	10	Litigation	Work with debtor and team regarding strategy issues.	Edwards, B.	2,025.00	0.40	810.00
08/21/25	10	Litigation	Research regarding exhibits on Liberty's exhibit list.	Huffman, J.	1,060.00	0.20	212.00
08/21/25	00	General	Advise regarding conditions for attorney M. review.	McConnell, H.	745.00	0.10	74.50

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
08/21/25	10	Litigation	Prepare and save search queries of relevant key terms for attorney review.	Petrucci III, P.	595.00	0.70	416.50
08/21/25	10	Litigation	Update document review database to further legal review of client documents.	Petrucci III, P.	595.00	0.20	119.00
08/21/25	10	Litigation	Attend hearings on motion to dismiss Liberty's adversary proceeding and motion in limine concerning insurers' expert witness.	Raskin, J. S.	1,550.00	4.50	6,975.00
08/21/25	10	Litigation	Final preparation for hearing on motion to dismiss Liberty's adversary proceeding.	Raskin, J. S.	1,550.00	2.00	3,100.00
08/21/25	04	Case Administration & Calendar Control	Evaluate case pleadings and notice of deposition.	Young, H.	330.00	0.50	165.00
08/22/25	11	Plan & Disclosure Statement	Videoconference with C. Tully and plan proponent counsel in preparation for August 25th hearing and preparation for same.	Cox, D.S.	1,375.00	3.00	4,125.00
08/22/25	11	Plan & Disclosure Statement	Communications concerning insurers' commentary on briefing and suggested proposed amendments to plan.	Raskin, J. S.	1,550.00	1.50	2,325.00
08/22/25	04	Case Administration & Calendar Control	Evaluate case pleadings and notice of deposition.	Young, H.	330.00	0.50	165.00
08/23/25	11	Plan & Disclosure Statement	Prepare for confirmation hearing and prep session with witnesses.	Cox, D.S.	1,375.00	3.80	5,225.00

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
08/23/25	16	Travel	Non-working travel from Los Angeles to Virginia for confirmation hearing (4.2 hours travel billed at half time).	Cox, D.S.	1,375.00	2.10	2,887.50
08/24/25	11	Plan & Disclosure Statement	Meet with Caplin and Hunton teams and witnesses to prepare for confirmation hearing.	Cox, D.S.	1,375.00	6.60	9,075.00
08/25/25	11	Plan & Disclosure Statement	Prepare for and attend plan confirmation hearing and related follow-up.	Cox, D.S.	1,375.00	7.40	10,175.00
08/25/25	07	Fee Applications - Self	Revise July monthly fee statement to incorporate comments from UCC counsel.	DeSantis, C. M.	850.00	0.40	340.00
08/25/25	11	Plan & Disclosure Statement	Communications concerning Plan amendments proposed by Hartford.	Raskin, J. S.	1,550.00	0.50	775.00
08/25/25	07	Fee Applications - Self	Correspond with the Committee's counsel and MLB regarding final fee application.	Shim, D. K.	1,100.00	0.30	330.00
08/25/25	04	Case Administration & Calendar Control	Evaluate case pleadings and notice of deposition.	Young, H.	330.00	0.50	165.00
08/26/25	11	Plan & Disclosure Statement	Attend confirmation hearing and related follow-up.	Cox, D.S.	1,375.00	6.30	8,662.50
08/26/25	04	Case Administration & Calendar Control	Evaluate case pleadings and notice of deposition.	Young, H.	330.00	0.50	165.00
08/27/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
08/27/25	04	Case Administration & Calendar Control	Evaluate case pleadings and notice of deposition.	Young, H.	330.00	0.50	165.00

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Date	Task Code	Task Description	Description	Timekeeper	Rate	Hours	Amount
08/28/25	11	Plan & Disclosure Statement	Analyze proposed Liberty language and exchange correspondence with J. Raskin and Caplin team regarding same.	Cox, D.S.	1,375.00	1.50	2,062.50
08/28/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
08/28/25	11	Plan & Disclosure Statement	Communications with Committee counsel concerning potential further amendments to plan.	Raskin, J. S.	1,550.00	1.30	2,015.00
08/29/25	10	Litigation	Analyze Court order granting Liberty motion to withdraw reference and exchange correspondence with J. Liesemer regarding same.	Cox, D.S.	1,375.00	0.30	412.50
08/29/25	00	General	Evaluate case pleadings.	Guzzi, T. A.	520.00	0.20	104.00
08/29/25	10	Litigation	Communications concerning decision on motion to withdraw the reference to the bankruptcy court.	Raskin, J. S.	1,550.00	0.50	775.00
08/29/25	07	Fee Applications - Self	Correspond with the Committee's counsel and MLB regarding final fee application.	Shim, D. K.	1,100.00	0.30	330.00
08/31/25	16	Travel	Non-working travel, return to Los Angeles from confirmation hearing (5.3 hrs travel billed at half time).	Cox, D.S.	1,375.00	2.60	3,575.00
Matter Total						138.60	\$ 191,139.00

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Summary for Fee Services Rendered

	Hours	Rate	Amount
PARTNER			
Cox, D.S.	76.80	1,375.00	105,600.00
Edwards, B.	0.40	2,025.00	810.00
Raskin, J. S.	50.40	1,550.00	78,120.00
ASSOCIATE			
DeSantis, C. M.	2.40	850.00	2,040.00
Huffman, J.	0.20	1,060.00	212.00
Shim, D. K.	1.30	1,100.00	1,430.00
PARALEGAL			
Guzzi, T. A.	1.60	520.00	832.00
MANAGER OF EDATA LEARNING			
McConnell, H. M.	0.10	745.00	74.50
PRACTICE TECHNOLOGY PROJECT MANAGER			
Petrucci III, P.	0.90	595.00	535.50
LEGAL PRACTICE ASSISTANT			
Young, H.	4.50	330.00	1,485.00
Matter Total		138.60	\$ 191,139.00

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Disbursements and Other Related Charges Incurred on Your Behalf

Date	Name	Description	Amount
06/30/25	Cox, David S	Court Reporter - Veritext - fees for Virtual Proceeding and Transcript Services	\$ 5,702.17
08/04/25	Raskin, Jeffrey S	Air CVFWUY : 006 7278848733 : 2025-08-20 - 2025-08-22 : RASKIN/JEFFREY-->SANATLRICATLSAN : Billable	\$ 984.73
08/14/25	Raskin, Jeffrey S	WestLaw	\$ 412.50
08/14/25	Cox, David S	WestLaw	\$ 76.00
08/15/25	Cox, David S	WestLaw	\$ 228.00
08/17/25	Raskin, Jeffrey S	WestLaw	\$ 76.00
08/20/25	Raskin, Jeffrey S	Taxi - JEFF RASKIN - /Lift expenses	\$ 116.30
08/20/25	Raskin, Jeffrey S	Hotel - JEFF RASKIN -	\$ 600.27
08/24/25	Cox, David S	Air QWVDJP : 279 7327270997 : 2025-08-31 - 2025-08-31 : COX/DAVID SEAN-->BOSLAX : Billable	\$ 278.48
08/26/25	Raskin, Jeffrey S	WestLaw	\$ 76.00
08/28/25	Raskin, Jeffrey S	WestLaw	\$ 76.00
08/29/25	Data Services, Data Services	Data Services Active - R fee; August; 87.01 GB	\$ 1,740.20
08/29/25	eData Services, eData Services	eData User Fees (Monthly) - Relativity fee; August; 4.00 User	\$ 380.00
Total Disbursements			\$ 10,746.65

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Summary of Disbursements and Other Related Charges Incurred on Your Behalf

Description	Amount
Miscellaneous Travel	1,979.78
Filing Fees	5,702.17
Legal Research	944.50
Hosting	1,740.20
User Fees	380.00
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Total Disbursements	\$ 10,746.65
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