Docket #1571 Date Filed: 10/30/2026

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Special Conflicts Counsel for the Debtor and Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:	)	Chapter 11
HOPEMAN BROTHERS, INC.,	)	Case No. 24–32428 (KLP)
Debtor.	)	

SUMMARY OF THIRD AND FINAL APPLICATION OF KUTAK ROCK LLP AS SPECIAL CONFLICTS COUNSEL FOR THE DEBTOR AND DEBTOR-IN-POSSESSION

Basic Information	
Name of Applicant:	Kutak Rock LLP
Name of Client:	Hopeman Brothers, Inc. Debtor and Debtor in Possession
Petition Date:	June 30, 2024
Retention Date:	January 1, 2025
Date of Order Approving Employment:	January 21, 2025, effective as of January 1, 2025
Third Application Period	
Time Period Covered:	July 1, 2025 – September 15, 2026
Total Hours Billed:	37.30
Total Fees Requested:	$29,342.50
Total Expenses Requested:	$56.15
Blended Rate for Attorneys:	$889/hour
Blended Rate for All Timekeepers:	$787/hour
Rate Increases Not Previously Approved or Disclosed:	None
Total Professionals:	3

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Total Professionals Billing Less Than 15 Hours:	2
Final Application Period	
Time Period Covered:	January 1, 2025 – September 15, 2026
Total Hours Billed:	266.80
Total Fees Requested:	$214,732.00
Total Expenses Requested:	$251.55
Blended Rate for Attorneys:	$830/hour
Blended Rate for All Timekeepers:	$805/hour
Rate Increases Not Previously Approved or Disclosed:	None
Total Professionals:	6
Total Professionals Billing Less Than 15 Hours:	3
Historical	
Fees Approved to Date by Interim Order:	$185,389.50
Expenses Approved to Date by Interim Order:	$195.40
Allowed Fees Paid to Date:	$185,389.50
Allowed Expenses Paid to Date:	$195.40
Fees Paid Pursuant to Monthly Statements, Not Yet Allowed:	$16,394.80
Expenses Paid Pursuant to Monthly Statements, Not Yet Allowed:	$0.00

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In re:	)	Chapter 11
HOPEMAN BROTHERS, INC.,	)	Case No. 24 – 32428 (KLP)
Debtor.	)	

THIRD AND FINAL APPLICATION OF KUTAK ROCK LLP AS SPECIAL CONFLICTS COUNSEL FOR THE DEBTOR AND DEBTOR-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD JULY 1, 2025 THROUGH SEPTEMBER 15, 2026 AND FINAL ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD JANUARY 1, 2025 THROUGH SEPTEMBER 15, 2026

Kutak Rock LLP ("***Kutak***"), special conflicts counsel for the debtor and debtor in possession in the above-captioned case (the "***Debtor***"), submits this application (the "***Application***") for allowance of compensation for professional services rendered by Kutak to the Debtor for the period from July 1, 2025 through and including September 15, 2026 (the "***Third Application Period***"), and reimbursement of actual and necessary expenses incurred by Kutak during the Third Application Period, and for final allowance of all compensation and reimbursement of expenses for the period from January 1, 2025 through and including September 15, 2026 (the "***Final Application Period***"), under 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 Procedure for the United States Bankruptcy Court of the Eastern District of Virginia (the "***Local Rules***") and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* entered on September 9, 2024 [Docket No. 162] (the "***Interim Compensation Procedures Order***"). In support of this Application, Kutak represents 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 State District Court for the Eastern District of Virginia, dated August 15, 1984. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

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

3. The statutory bases for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016 and Local Rules 2014-1 and 2016-1.

Background

4. On June 30, 2024 (the "***Petition Date***"), the Debtor filed with the Court its voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing the above-captioned chapter 11 case.

5. On July 22, 2024, the Office of the United States Trustee (the "***U.S. Trustee***") for the Eastern District of Virginia appointed the Official Committee of Unsecured Creditors [Docket No. 69].

6. On September 9, 2024, the Court entered the Interim Compensation Procedures Order, which approved the compensation procedures contained therein [Docket No. 162] (the "***Compensation Procedures***").

7. On January 21, 2025, the Court entered the *Order (I) Authorizing the Appointment of Kutak Rock LLP as Special Conflict Counsel Effective as of January 1, 2024, and (II) Granting Related Relief* [Docket No. 509] which appointed Kutak as special conflict counsel for the Debtor.

8. Pursuant to the Compensation Procedures, professionals retained in these cases are authorized to submit monthly fee statements to the Application Recipients (as defined in the Compensation Procedures). Provided that no objection to a monthly fee statement is timely filed, the Debtor is authorized to pay such professional an amount equal to eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such monthly fee statement.

9. In addition, pursuant to the Compensation Procedures, beginning with the period ending on August 31, 2024, and at three-month intervals thereafter, professionals retained in these cases are authorized to file interim fee applications with the Court. This Application covers the Third Application Period and seeks final allowance of all compensation and reimbursement of expenses for the Final Application Period.

10. On June 12, 2025, Kutak filed the *First Interim Application of Kutak Rock LLP as Special Conflicts Counsel for the Debtor and Debtor-in-Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2025 Through March 31, 2025* [Docket No. 866] (the "***First Interim Application***"). On July 16, 2025, the Court entered the *Order Granting First Interim Application of Kutak Rock LLP as Special Conflicts Counsel for the Debtor and Debtor-in-Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2025 Through March 31, 2025*

[Docket No. 1028] granting the First Interim Application as set forth therein, allowing fees in the amount of $112,645.00 and reimbursement of expenses in the amount of $123.55.

11. On October 17, 2025, Kutak filed the *Second Interim Application of Kutak Rock LLP as Special Conflicts Counsel for the Debtor and Debtor-in-Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period April 1, 2025 Through June 30, 2025* [Docket No. 1247] (the "***Second Interim Application***"). On November 14, 2025, the Court entered the *Order Granting Second Interim Application of Kutak Rock LLP as Special Conflicts Counsel for the Debtor and Debtor-in-Possession, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period April 1, 2025 Through June 30, 2025* [Docket No. 1283] granting the Second Interim Application as set forth therein, allowing fees in the amount of $72,744.50 and reimbursement of expenses in the amount of $71.85.

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

13. On October 31, 2025, this Court entered its proposed findings of fact and conclusions of law [Docket No. 1267] recommending that the United States District Court for the Eastern District of Virginia, Richmond Division (the "***District Court***") issue the proposed order (the "***Confirmation Order***") confirming the *Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code*, dated May 21, 2025 [Docket No. 766] (as modified by the *Modified Amended Plan of Reorganization of Hopeman Brothers, Inc. Under*

Chapter 11 of the Bankruptcy Code, dated August 21, 2025 [Docket No. 1141] and the *Second Modified Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code*, dated September 5, 2025 [Docket No. 1185], and as may be further amended, modified, or supplemented from time to time, the "***Plan***").

14. On August 18, 2026, the District Court issued the Confirmation Order [Docket No. 1542]. The Plan became effective on September 15, 2026 [Docket No. 1551], and the Debtor emerged from this case as the Reorganized Debtor (as defined in the Plan).

Relief Requested

15. Kutak submits this Application (a) for allowance of reasonable compensation for the actual, reasonable and necessary professional services that it has rendered as special conflicts counsel for the Debtor in this case during the Third Application Period, and for reimbursement of actual, reasonable and necessary expenses incurred in representing the Debtor during that same period, and (b) for final allowance of all compensation and reimbursement of expenses for the Final Application Period including the amounts previously allowed on an interim basis as described in paragraphs 10 and 11 above. For the Third Application Period, Kutak seeks fees for services rendered in the amount of $29,342.50 and actual, reasonable and necessary expenses totaling $56.15. On a final basis, Kutak seeks allowance of fees in the aggregate amount of $214,732.00 and expenses in the aggregate amount of $251.55, for a total of $214,983.55.

16. The Application is supported by the following Exhibits, which are attached hereto and patterned on the UST Guidelines:

(i) Exhibit A contains a summary schedule of the time expended by all Kutak professionals and paraprofessionals engaged in the representation of the Debtor during the Third Application Period and Final Application Period.

(ii) Exhibit B contains a summary schedule of hours and fees covered by this Application, categorized by project code during the Third Application Period and Final Application Period.

(iii) Exhibit C contains a summary schedule of the out-of-pocket expenses incurred by Kutak during the Third Application Period and Final Application Period.

(iv) Exhibit D contains a disclosure of "customary and comparable compensation" charged by Kutak's professionals and paraprofessionals. As requested in the UST Guidelines, Exhibit D provides a summary of the blended hourly rates of the timekeepers (segregated by rank) included in this Application compared to the blended hourly rates for similar non-bankruptcy timekeepers in Kutak's D.C./Richmond regional office during the Third Application Period and Final Application Period.

(v) Exhibit E contains the monthly fee statements properly served by Kutak during the Third Application Period (collectively, the "***Monthly Statements***"), together with Kutak's invoice No. 3832196 for services rendered and expenses incurred from September 1, 2025 through and including September 15, 2026.

Basis for Relief Requested

17. During the Final Application Period, Kutak provided numerous services to the Debtor including but not limited to (i) representing, as conflicts counsel, the Debtor's interests in connection with the Debtor's compromise with certain insurers, including litigation and negotiations in connection therewith, and in connection with plan negotiations, revisions to the plan documents, the confirmation hearing, and the proposed findings of fact and conclusions of law and related report and recommendation; (ii) communicating with HII's counsel and the Debtor's counsel regarding the settlement proceeds, the disbursement motion, plan and confirmation order issues, and requests for relief from the stay; (iii) reviewing litigation filings in conflict matters, including the motion to withdraw the reference, motions to dismiss, and motions in limine; and (iv) communicating with the Debtor's other professionals, professionals retained by the official committee of unsecured creditors and other professionals in conflict matters. A more detailed description of the services provided to the Debtor is set forth in the Monthly Statements, the invoice attached as Exhibit E, the First Interim Application and the Second Interim Application.

18. In performing the services detailed in this Application, Kutak has endeavored to ensure that its professionals comply with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures or orders of the Court.

19. Pursuant to the terms of the Interim Compensation Procedures Order, Kutak properly served two Monthly Statements for services provided and expenses incurred during the Third Application Period as follows:

Period Covered by Monthly Statement	Total Fees	Total Expenses	Date Served and Docket No.	Objection Deadline	Amount of Fees Received (80%)	Amount of Expenses Received (100%)
July 1-31, 2025	$5,964.50	$0.00	Sept. 17, 2025 [Docket No. 1205]	Oct. 8, 2025	$4,771.60	$0.00
Aug. 1-31, 2025	$14,529.00	$0.00	Oct. 14, 2025 [Docket No. 1232]	Nov. 4, 2025	$11,623.20	$0.00
Sept. 1, 2025 through Sept. 15, 2026[1]	$8,849.00	$56.15	N/A	N/A	$0.00	$0.00

20. In accordance with the Interim Compensation Procedures Order, and as set forth in Local Rule 2016-1, each Monthly Statement included (i) a detailed itemization of the service hours expended by matter and professional and (ii) a summary schedule of hours and fees categorized by project code. Each Monthly Statement that is attached also includes a detailed chronological itemization of the services rendered by each professional and paraprofessional, calculated by tenths of an hour and categorized in accordance with the appropriate project code. Copies of Kutak's Monthly Statements are attached hereto as Exhibit E. Kutak's fees of $8,849.00 and expenses of

[1] Kutak did not serve a Monthly Statement for September 1, 2025 through September 15, 2026, and instead includes its invoice for that period (Invoice No. 3832196) in this Application.

$56.15 for the period from September 1, 2025 through and including September 15, 2026 were not the subject of a Monthly Statement and are set forth in Kutak's invoice No. 3832196, which is also attached as part of Exhibit E and includes a detailed chronological itemization of the services rendered.

21. Kutak has endeavored to represent the Debtor in the most efficient manner possible. Moreover, Kutak has endeavored to coordinate with the other professionals involved in this case so as to minimize any duplication of effort and to minimize attorneys' fees and expenses to the Debtor.

22. No agreement or understanding exists between Kutak and any other person for the sharing of compensation received or to be received for services rendered in or in connection with this case.

Statement Pursuant to UST Guidelines

23. The following is provided in response to the questions set forth in ¶ C.5 of the UST Guidelines:

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

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 this fee application include time or fees related to reviewing the time records or preparing, reviewing, or revising invoices? (This is limited to work

involved in preparing and editing billing 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: No.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your 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: Yes.

Notice

24. Notice of this Application has been provided to all necessary parties in accordance with the Interim Compensation Procedures Order. Kutak submits that no other or further notice need be provided.

WHEREFORE, Kutak respectfully requests that this Court enter an Order, substantially in the form attached hereto (i) approving this Application; (ii) providing that Kutak be allowed the sum of $29,342.50 as compensation for reasonable and necessary professional services rendered to the Debtor and the sum of $56.15 for reimbursement of actual and necessary costs and expenses incurred during the Third Application Period, for a total of $29,398.65; (iii) allowing on a final basis all compensation and reimbursement of expenses for the Final Application Period in the aggregate amounts of $214,732.00 and $251.55, respectively, for a total of $214,983.55; (iv) authorizing and directing the Debtor to pay Kutak the outstanding amount of such sums; and (v) for such other relief as the Court deems proper and just.

Dated: October 30, 2026

/s/ Peter J. Barrett

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Special Conflicts Counsel for
the Debtor and Debtor-in-Possession

Proposed Order

Peter J. Barrett (VA 46179)
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Special Conflicts Counsel for
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:	)	Chapter 11
HOPEMAN BROTHERS, INC.,	)	Case No. 24 – 32428 (KLP)
Debtor.	)	

ORDER GRANTING THIRD AND FINAL APPLICATION OF KUTAK ROCK LLP AS SPECIAL CONFLICTS COUNSEL FOR THE DEBTOR AND DEBTOR-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD JULY 1, 2025 THROUGH SEPTEMBER 15, 2026 AND FINAL ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD JANUARY 1, 2025 THROUGH SEPTEMBER 15, 2026

Upon consideration of the Third and Final Fee Application (the "***Application***")[1] of Kutak Rock LLP ("***Kutak***"), special conflicts counsel for the debtor and debtor in possession in the above-captioned case (collectively, "***Debtor***"), for the period from July 1, 2025 through and including September 15, 2026 (the "***Third Application Period***"), and for final allowance of all compensation and reimbursement of expenses for the period from January 1, 2025 through and including September 15, 2026 (the "***Final Application Period***"); and the Court having reviewed the Application, each of the Monthly Statements that were served by Kutak during the Third

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

Application Period, and the invoice attached to the Application, and finding that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining that proper and adequate notice has been given and that no other or further notice is necessary; and after due deliberation thereon; and good and sufficient cause appearing therefore,

IT IS HEREBY ORDERED that:

1. The Application is GRANTED.

2. Kutak is allowed compensation in the amount of $29,342.50 and reimbursement of expenses in the amount of $56.15 for the Third Application Period as requested in the Application.

3. Kutak is allowed, on a final basis, compensation in the aggregate amount of $214,732.00 and reimbursement of expenses in the aggregate amount of $251.55 for the Final Application Period, which amounts include all compensation and expenses previously allowed on an interim basis.

4. The Debtor or Reorganized Debtor is authorized and directed to disburse to Kutak payment in the amount of the difference between the amounts allowed herein and the payments previously received by Kutak, if any, on account of such fees and expenses.

5. The Debtor or Reorganized Debtor is authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.

6. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

7. This Order shall be effective immediately upon entry.

Dated: _____

_____
UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ *Peter J. Barrett*
Peter J. Barrett (VA 46179)
Timothy S. Baird (VA 36315)
Jeremy S. Williams (VA 77469)
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Special Conflicts Counsel for
the Debtor and Debtor-in-Possession

SEEN:
/s/
Kathryn R. Montgomery (VSB No. 42380)
Assistant United States Trustee
Office of the United States Trustee
701 E. Broad Street, Suite 4304
Richmond, Virginia 23219
Kathryn.Montgomery@usdoj.gov

LOCAL RULE 9022-1 CERTIFICATE OF SERVICE

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

/s/ *Peter J. Barrett*

EXHIBIT A

PROFESSIONALS RENDERING SERVICES

Third Application Period (July 1, 2025 – September 15, 2026)

Professional	Position	Dept.	First Bar Admission Date	Hourly Billing Rate	Total Billed Hours	Total Compensation	Rate Increases
Peter J. Barrett	Partner	Bankr.	2000	$885.00	28.30	$25,045.50	None
Peter J. Barrett	Partner	Bankr.	2000	$930.00	2.90	$2,697.00	Increased from $885.00
Jeremy S. Williams	Partner	Bankr.	2008	$820.00	0.20	$164.00	None
Charisse Matthews	Paralegal	Bankr.	N/A	$240.00	3.90	$936.00	None
Charisse Matthews	Paralegal	Bankr.	N/A	$250.00	2.00	$500.00	Increased from $240.00
				Total:	**37.30**	**$29,342.50**	
Blended Attorney Rate				**$889**			

Final Application Period (January 1, 2025 – September 15, 2026)

Professional	Position	Dept.	First Bar Admission Date	Hourly Billing Rate	Total Billed Hours	Total Compensation	Rate Increases
Peter J. Barrett	Partner	Bankr.	2000	$885.00	177.20	$156,822.00	None
Peter J. Barrett	Partner	Bankr.	2000	$930.00	2.90	$2,697.00	Increased from $885.00
Jeremy S. Williams	Partner	Bankr.	2008	$820.00	28.50	$23,370.00	None
Timothy S. Baird	Counsel	Bankr.	1993	$630.00	45.00	$28,350.00	None
Haley Magel	Associate	Bankr.	2024	$425.00	1.60	$680.00	None
Charisse Matthews	Paralegal	Bankr.	N/A	$240.00	9.30	$2,232.00	None
Charisse Matthews	Paralegal	Bankr.	N/A	$250.00	2.00	$500.00	Increased from $240.00
Lynda Wood	Paralegal	Bankr.	N/A	$270.00	0.30	$81.00	None
				Total:	**266.80**	**$214,732.00**	

Blended Attorney Rate	**$830**	

EXHIBIT B

COMPENSATION BY PROJECT CATEGORY

Third Application Period (July 1, 2025 – September 15, 2026)

Matter Code	Matter Description	Hours	Total Fees
BO	Business Operations	1.00	$885.00
CA	Case Administration	1.70	$717.50
FEA	Fee/Employment Applications	13.20	$8,729.00
LIT	Litigation	2.30	$2,049.00
PDS	Plan and Disclosure Statement	17.80	$15,753.00
RSP	Relief from Stay/Adequate Protection Proceedings	1.30	$1,209.00
	Total:	37.30	**$29,342.50**

Final Application Period (January 1, 2025 – September 15, 2026)

Matter Code	Matter Description	Hours	Total Fees
BO	Business Operations	1.00	$885.00
CA	Case Administration	23.20	$17,044.50
CAO	Claims Administration and Objection	0.10	$88.50
FEA	Fee/Employment Applications	32.80	$23,519.50
LIT	Litigation	135.40	$107,553.00
PDS	Plan and Disclosure Statement	73.00	$64,432.50
RSP	Relief from Stay/Adequate Protection Proceedings	1.30	$1,209.00
	Total:	266.80	**$214,732.00**

EXHIBIT C

EXPENSE SUMMARY

Third Application Period (July 1, 2025 – September 15, 2026)

Expense Category	Expenses
Travel Expenses	$37.35
Pacer	$18.80
TOTAL EXPENSES:	**$56.15**

Final Application Period (January 1, 2025 – September 15, 2026)

Expense Category	Expenses
Computer Research	$16.82
Travel Expenses	$93.15
Reproduction	$106.00
Pacer	$35.60
Adjustment (Second Interim Order)	($0.02)
TOTAL EXPENSES:	**$251.55**

EXHIBIT D

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

Third Application Period (July 1, 2025 – September 15, 2026)

	Blended Hourly Rate[1]	
Category of Timekeeper	**Billed** (DC/Richmond Regional Office of Kutak for January 1, 2024 through December 31, 2025 excluding the Bankruptcy Group)	**Billed** (Third Application Period)
Partners/Of Counsel	$698	$889
Associates	$436	N/A
Paralegals/Legal Assistants	$251	$243
Aggregated:	**$462**	**$787**

[1] Consistent with ¶ C.3 of the UST Guidelines, the blended hourly rates set forth in column two of Exhibit D are calculated by dividing the dollar value of hours billed by the number of hours billed for the relevant timekeepers during the applicable time period. Exhibit D also segregates the timekeepers by rank using categories similar to those set forth in the UST Guidelines.

In addition, as requested by ¶ C.3 of the UST Guidelines, the blended hourly rates identified in Exhibit D for non-bankruptcy timekeepers includes discounted or alternative engagements, other than pro bono engagements and engagements for clients who are employees or charitable organizations that are billed at materially discounted rates.

Final Application Period (January 1, 2025 – September 15, 2026)

	Blended Hourly Rate	
Category of Timekeeper	**Billed** (DC/Richmond Regional Office of Kutak for January 1, 2024 through December 31, 2025 excluding the Bankruptcy Group)	**Billed** (Final Application Period)
Partners/Of Counsel	$698	$833
Associates	$436	$425
Paralegals/Legal Assistants	$251	$243
Aggregated:	**$462**	**$805**

EXHIBIT E

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IN THE UNITED STATES BANKRUPTCY COURT
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In re:	)	Chapter 11
HOPEMAN BROTHERS, INC.,	)	Case No. 24-32428 (KLP)
Debtor.	)	

MONTHLY FEE STATEMENT OF KUTAK ROCK LLP AS SPECIAL CONFLICTS COUNSEL FOR THE DEBTOR AND DEBTOR-IN-POSSESSION FOR SERVICES RENDERED FOR THE PERIOD FROM JULY 1, 2025 THROUGH AND INCLUDING JULY 31, 2025

Name of applicant:	**Kutak Rock LLP**
Name of Client:	Hopeman Brothers, Inc. Debtor and Debtor in Possession
Date retention order entered:	January 21, 2025, effective as of January 1, 2025
Date of retention:	January 1, 2025
Time Period Covered:	July 1, 2025 through July 31, 2025
Total Fees Requested:	$4,771.60 (80% of $5,964.50)
Total Expenses Requested:	$0.00
Type of Fee Statement:	Monthly Fee Statement[1]

[1] Notice of this Monthly Fee Statement shall be served in accordance with the Interim Compensation Order (as defined herein) and objections to payment of the amounts described in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.

Pursuant to sections 330, and 331 of title 11 of the United States Code, (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the "Local Bankruptcy Rules"), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* entered September 9, 2024 [Docket No. 162] (the "Interim Compensation Order"), Kutak Rock LLP, special conflicts counsel for Hopeman Brothers, Inc. (the "Debtor"), hereby submits this monthly fee statement (the "Monthly Fee Statement") for the allowance of compensation for the reasonable and necessary legal services rendered by Kutak Rock LLP for the period from July 1, 2025, through and including July 31, 2025 (the "Fee Period"). By this Monthly Fee Statement, Kutak Rock LLP seeks allowance of compensation for services rendered in the amount of $4,771.60 (which equals 80% of the compensation sought herein).

Itemization of Services Rendered and Disbursements Incurred

1. In support of this Monthly Fee Statement, Kutak has attached the following:

- **Exhibit A** is a summary of the prior fee statements and applications submitted by Kutak and the amounts allowed by the Court in connection with these chapter 11 cases.

- **Exhibit B** is a summary of the number of hours expended and fees incurred (on an aggregate basis) by Kutak partners, associates, and paraprofessionals during the Fee Period with respect to each of the subject matter categories that Kutak established in accordance with its internal billing procedures. Kutak incurred $5,964.50 in fees during the Fee Period. Pursuant to this Monthly Fee Statement, Kutak Rock LLP seeks reimbursement for 80% of such fees ($4,771.60 in the aggregate).

- **Exhibit C** is a summary providing certain information regarding the Kutak attorneys and paraprofessionals for whose work on these chapter 11 cases compensation is sought in this Monthly Fee Statement. Kutak's attorneys and paraprofessionals expended a total of 6.90 hours in connection with this chapter 11 case during the Fee Period.

- **Exhibit D** is a detailed invoice for the hours expended and fees incurred by Kutak Rock LLP's partners and paraprofessionals during the Fee Period with respect to each of the subject matter categories that Kutak Rock LLP established in accordance with its internal billing procedures.

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. Kutak Rock LP reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee statements and applications will be filed in accordance with the Bankruptcy Code, Bankruptcy Rules, Local Bankruptcy Rules, and Interim Compensation Order.

Notice

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

WHEREFORE, Kutak Rock LLP respectfully requests payment of its reasonable and necessary fees incurred during the Fee Period in the total amount of $4,771.60 which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Kutak Rock LLP during the Fee Period.

Dated: September 17, 2025
Richmond, Virginia

/s/ *Peter J. Barrett*
KUTAK ROCK LLP
Peter J. Barrett (VA 46179)
Timothy S. Baird (VA 36315)
Jeremy S. Williams (VA 77469)
1021 East Cary Street, Suite 810
Richmond, Virginia 23219
Telephone: (804) 644-1700
Facsimile: (804) 783-6192
Email: peter.barrett@kutakrock.com
tim.baird@kutakrock.com
jeremy.williams@kutakrock.com

Special Conflicts Counsel for the Debtor and Debtor-in-Possession

EXHIBIT A
Prior Fee Statement, Applications, and Allowances

Filing Name, Filing Date, Docket No.	Period Covered	Total Fees and Expenses	Requested		Preliminarily Allowed	
			Fees	Expenses	Fees	Expenses
First Monthly Fee Statement Feb 24, 2025 Doc. No. 589	Jan 1, 2025 to Jan 31, 2025	$66,996.45	$66,889.50	$106.95	$53,597.16	$106.95
Second Monthly Fee Statement Mar 31, 2025 Doc. No. 643	Feb 1, 2025 to Feb 28, 2025	$26,065.20	$26,060.00	$5.20	$20,848.00	$5.20
Third Monthly Fee Statement Apr 28, 2025 Doc. No. 683	Mar 1, 2025 to Mar 31, 2025	$19,706.90	$19,695.50	$11.40	$15,756.40	$11.40
First Interim Fee Application June 12, 2025 Doc. No. 866	**Jan 1, 2025 to Mar 31, 2025**	**$112,768.55**	**$112,645.00**	**$123.55**	**$112,645.00**	**$123.55**
Fourth Monthly Fee Statement May 29, 2025 Doc. No. 815	Apr 1, 2025 to Apr 30, 2025	$47,898.12	$47,873.50	$24.62	$38,290.80	$24.62
Fifth Monthly Fee Statement July 16, 2025 Doc. No. 1030	May 1, 2025 to May 31, 2025	$17,378.35	$17,360.00	$18.35	$13,888.00	$18.35
Sixth Monthly Fee Statement Aug 8, 2025 Doc. No. 1095	June 1, 2025 to June 30, 2025	$7,549.90	$7,521.00	$28.90	$6,016.80	$28.90

EXHIBIT B

Statement of Fees by Subject Matter During the Fee Period

Matter Code	Matter Description	Hours	Fees Requested
CA	Case Administration	0.50	$429.50
FEA	Fee/Employment Applications	2.20	$1,818.00
LIT	Litigation	1.70	$1,504.50
PDS	Plan and Disclosure Statement	2.50	$2,212.50
	Total	**6.90**	**$5,964.50**

EXHIBIT C

Professionals Rendering Services during the Fee Period

The Kutak attorneys who rendered professional services in these cases during the Fee Period include:

Professional	Position	Year Admitted	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Peter J. Barrett	Partner	2000	Bankruptcy, Restructuring and Creditors' Rights	$885.00	6.50	$5,752.50
Jeremy S. Williams	Partner	2008	Bankruptcy, Restructuring and Creditors' Rights	$820.00	0.20	$164.00
				Totals	**6.70**	**$5,916.50**

The Kutak paraprofessionals who rendered professional services in these cases during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Charisse Matthews	Paralegal	Bankruptcy, Restructuring and Creditors' Rights	$240.00	0.20	$48.00
			Totals	**0.20**	**$48.00**

EXHIBIT D

Detailed Invoice of Fees and Expenses Incurred During the Fee Period

K U T A K R O C K L L P

RICHMOND, VIRGINIA
Telephone 804-644-1700
Facsimile 804-783-6192

Federal ID 47-0597598

September 15, 2025

Check Remit To:
Kutak Rock LLP
PO Box 30057
Omaha, NE 68103-1157

ACH/Wire Transfer Remit To:
ABA #104000016
First National Bank of Omaha
Kutak Rock LLP
A/C # 24690470
Reference: Invoice No. 3625421
Client Matter No. 133714-1
Notification Email: eftgroup@kutakrock.com

Billed through 07/31/25

Invoice No. 3625421

Hopeman Brothers, Inc.
6 Auburn Ct.
Brookline, MA 02446

Conflicts Counsel

For Professional Legal Services Rendered

BILLING SUMMARY

NAME	HOURS	RATE	AMOUNT
J.Williams	0.20	820.00	$164.00
P.Barrett	6.50	885.00	5,752.50
C.Matthews	0.20	240.00	48.00
TOTAL FEES	6.90		5,964.50
TOTAL DISBURSEMENTS			0.00
TOTAL CURRENT AMOUNT DUE			$5,964.50

KUTAK ROCK LLP

Hopeman Brothers, Inc.
September 15, 2025
Client Matter No. 133714-1
Invoice No. 3625421
Page 2

Case Administration

07/17/25	J. Williams	0.20	164.00	Conference with Mr. Barrett regarding content and format of Monthly Operating Reports
07/17/25	P. Barrett	0.30	265.50	Review of correspondence from UST regarding MORs and draft correspondence to UST and debtor counsel regarding same (.10); review of issue regarding MOR and telephone conferences with Mr. Williams and Mr. Long regarding same (.20)

Fee/Employment Applications

07/07/25	C. Matthews	0.10	24.00	Submit order granting first interim fee application
07/07/25	P. Barrett	0.20	177.00	Draft fee order and draft correspondence to UST regarding same (.20)
07/08/25	C. Matthews	0.10	24.00	Review of correspondence from Mr. Barrett and file fee application
07/08/25	P. Barrett	0.20	177.00	Review of correspondence from debtor's counsel regarding fee application and draft response (.10); review of CNO and draft revision (.10)
07/15/25	P. Barrett	1.10	973.50	Draft various correspondence to working group regarding CNO and submission of proposed interim fee order (.10); review of correspondence from debtor's counsel regarding fee statements and draft reply (.10); draft revisions to exhibit to monthly fee application (.20); draft monthly fee application and revise (.50); draft correspondence to debtor's counsel regarding same (.10); review of revisions to exhibit and

KUTAK ROCK LLP

				correspondence from debtor's counsel regarding same (.10)
07/16/25	P. Barrett	0.50	442.50	Telephone conference with debtor's counsel regarding hearing on fee application (.10); draft correspondence to working group regarding revisions to fee statement exhibit (.10); draft revisions to May fee application (.10); review of additional revision to exhibits (.10); review of correspondence from noticing agent regarding service and draft reply (.10)
Litigation				
07/03/25	P. Barrett	0.10	88.50	Review of correspondence from Ms. Sieg regarding Liberty appeal and draft correspondence to debtor's counsel regarding same (.10)
07/07/25	P. Barrett	0.70	619.50	Telephone conference with HII's counsel regarding objection to Liberty motion and draft correspondence to debtor's counsel regarding same (.10); review of motion to withdraw the reference and LA plaintiff's motion to dismiss (.20); additional telephone conference with HII's counsel regarding objection and review of correspondence to Mr. Long (.10); review of objections to withdrawal motion and 12(b)(6) motions filed by the debtor and committee (.30)
07/09/25	P. Barrett	0.30	265.50	Review of issue regarding settlement payment and review of correspondence to UST and attachments (.20); draft correspondence to HII's counsel regarding same (.10)
07/10/25	P. Barrett	0.60	531.00	Review of correspondence from debtor's counsel regarding settlement

KUTAK ROCK LLP

				proceeds and correspondence from client and UST (.20); review of materials in advance of HII call (.10); draft correspondence to HII regarding settlement refund request (.20); telephone conference with HII's counsel regarding same (.10)
Plan and Disclosure Statement				
07/07/25	P. Barrett	0.70	619.50	Review of plan objections filed by insurers and attached exhibits (.70)
07/09/25	P. Barrett	0.80	708.00	Review of correspondence from HII's counsel regarding proposed revisions (.10); review of definitions in plan, TDP and agreement and draft correspondence to Mr. Long regarding same (.30); draft correspondence to counsel regarding HII regarding response from plan proponents (.10); telephone conference with debtor's counsel regarding plan issues (.30)
07/10/25	P. Barrett	0.10	88.50	Review of various correspondence from debtor's counsel regarding plan confirmation hearing (.10)
07/11/25	P. Barrett	0.10	88.50	Review of adjournment notice and draft correspondence to working group regarding same (.10)
07/28/25	P. Barrett	0.80	708.00	Review of plan proponents' memorandum of law in support of confirmation (.80)
TOTAL HOURS		6.90		
TOTAL FOR SERVICES RENDERED				$5,964.50

KUTAK ROCK LLP

Hopeman Brothers, Inc.
September 15, 2025
Client Matter No. 133714-1
Invoice No. 3625421
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KUTAK ROCK LLP

Hopeman Brothers, Inc.
September 15, 2025
Client Matter No. 133714-1
Invoice No. 3625421
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ACTIVITY SUMMARY

ACTIVITY	HOURS	AMOUNT
Case Administration	0.50	$429.50
Fee/Employment Applications	2.20	1,818.00
Litigation	1.70	1,504.50
Plan and Disclosure Statement	2.50	2,212.50
TOTAL FEES	6.90	5,964.50

Peter J. Barrett (VA 46179)
Timothy S. Baird (VA 36315)
Jeremy S. Williams (VA 77469)
KUTAK ROCK LLP
1021 East Cary Street, Suite 810
Richmond, Virginia 23219
Telephone: (804) 644-1700
Facsimile: (804) 783-6192
Special Conflicts Counsel for
the Debtor and Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:	)	Chapter 11
HOPEMAN BROTHERS, INC.,	)	Case No. 24-32428 (KLP)
Debtor.	)	

MONTHLY FEE STATEMENT OF KUTAK ROCK LLP AS SPECIAL CONFLICTS COUNSEL FOR THE DEBTOR AND DEBTOR-IN-POSSESSION FOR SERVICES RENDERED FOR THE PERIOD FROM AUGUST 1, 2025 THROUGH AND INCLUDING AUGUST 31, 2025

Name of applicant:	**Kutak Rock LLP**
Name of Client:	Hopeman Brothers, Inc. Debtor and Debtor in Possession
Date retention order entered:	January 21, 2025, effective as of January 1, 2025
Date of retention:	January 1, 2025
Time Period Covered:	August 1, 2025 through August 31, 2025
Total Fees Requested:	$11,623.20 (80% of $14,529.00)
Total Expenses Requested:	$0.00
Type of Fee Statement:	Monthly Fee Statement[1]

[1] Notice of this Monthly Fee Statement shall be served in accordance with the Interim Compensation Order (as defined herein) and objections to payment of the amounts described in this Monthly Fee Statement shall be addressed in accordance with the Interim Compensation Order.

2432428251014000000000002

Pursuant to sections 330, and 331 of title 11 of the United States Code, (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Eastern District of Virginia (the "Local Bankruptcy Rules"), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* entered September 9, 2024 [Docket No. 162] (the "Interim Compensation Order"), Kutak Rock LLP, special conflicts counsel for Hopeman Brothers, Inc. (the "Debtor"), hereby submits this monthly fee statement (the "Monthly Fee Statement") for the allowance of compensation for the reasonable and necessary legal services rendered by Kutak Rock LLP for the period from August 1, 2025, through and including August 31, 2025 (the "Fee Period"). By this Monthly Fee Statement, Kutak Rock LLP seeks allowance of compensation for services rendered in the amount of $11,623.20 (which equals 80% of the compensation sought herein).

Itemization of Services Rendered and Disbursements Incurred

1. In support of this Monthly Fee Statement, Kutak has attached the following:

- **Exhibit A** is a summary of the prior fee statements and applications submitted by Kutak and the amounts allowed by the Court in connection with these chapter 11 cases.

- **Exhibit B** is a summary of the number of hours expended and fees incurred (on an aggregate basis) by Kutak partners, associates, and paraprofessionals during the Fee Period with respect to each of the subject matter categories that Kutak established in accordance with its internal billing procedures. Kutak incurred $14,529.00 in fees during the Fee Period. Pursuant to this Monthly Fee Statement, Kutak Rock LLP seeks reimbursement for 80% of such fees ($11,623.20 in the aggregate).

- **Exhibit C** is a summary providing certain information regarding the Kutak attorneys and paraprofessionals for whose work on these chapter 11 cases compensation is sought in this Monthly Fee Statement. Kutak's attorneys and paraprofessionals expended a total of 17.00 hours in connection with this chapter 11 case during the Fee Period.

- **Exhibit D** is a detailed invoice for the hours expended and fees incurred by Kutak Rock LLP's partners and paraprofessionals during the Fee Period with respect to each of the subject matter categories that Kutak Rock LLP established in accordance with its internal billing procedures.

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. Kutak Rock LP reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee statements and applications will be filed in accordance with the Bankruptcy Code, Bankruptcy Rules, Local Bankruptcy Rules, and Interim Compensation Order.

Notice

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

WHEREFORE, Kutak Rock LLP respectfully requests payment of its reasonable and necessary fees incurred during the Fee Period in the total amount of $11,623.20 which is 80% of the fees incurred by the Debtor for reasonable and necessary professional services rendered by Kutak Rock LLP during the Fee Period.

Dated: October 14, 2025
Richmond, Virginia

/s/ *Peter J. Barrett*
KUTAK ROCK LLP
Peter J. Barrett (VA 46179)
Timothy S. Baird (VA 36315)
Jeremy S. Williams (VA 77469)
1021 East Cary Street, Suite 810
Richmond, Virginia 23219
Telephone: (804) 644-1700
Facsimile: (804) 783-6192
Email: peter.barrett@kutakrock.com
tim.baird@kutakrock.com
jeremy.williams@kutakrock.com

Special Conflicts Counsel for the Debtor and Debtor-in-Possession

EXHIBIT A
Prior Fee Statement, Applications, and Allowances

Filing Name, Filing Date, Docket No.	Period Covered	Total Fees and Expenses	Requested		Preliminarily Allowed	
			Fees	Expenses	Fees	Expenses
First Monthly Fee Statement Feb 24, 2025 Doc. No. 589	Jan 1, 2025 to Jan 31, 2025	$66,996.45	$66,889.50	$106.95	$53,597.16	$106.95
Second Monthly Fee Statement Mar 31, 2025 Doc. No. 643	Feb 1, 2025 to Feb 28, 2025	$26,065.20	$26,060.00	$5.20	$20,848.00	$5.20
Third Monthly Fee Statement Apr 28, 2025 Doc. No. 683	Mar 1, 2025 to Mar 31, 2025	$19,706.90	$19,695.50	$11.40	$15,756.40	$11.40
First Interim Fee Application June 12, 2025 Doc. No. 866	**Jan 1, 2025 to Mar 31, 2025**	**$112,768.55**	**$112,645.00**	**$123.55**	**$112,645.00**	**$123.55**
Fourth Monthly Fee Statement May 29, 2025 Doc. No. 815	Apr 1, 2025 to Apr 30, 2025	$47,898.12	$47,873.50	$24.62	$38,290.80	$24.62
Fifth Monthly Fee Statement July 16, 2025 Doc. No. 1030	May 1, 2025 to May 31, 2025	$17,378.35	$17,360.00	$18.35	$13,888.00	$18.35
Sixth Monthly Fee Statement Aug 8, 2025 Doc. No. 1095	June 1, 2025 to June 30, 2025	$7,549.90	$7,521.00	$28.90	$6,016.80	$28.90
Seventh Monthly Fee Statement Sep 17, 2025 Doc. No. 1205	July 1, 2025 to July 31, 2025	$5,964.50	$5,964.50	$0.00	$5,964.50	$0.00

EXHIBIT B

Statement of Fees by Subject Matter During the Fee Period

Matter Code	Matter Description	Hours	Fees Requested
BO	Business Operations	1.00	$885.00
FEA	Fee/Employment Applications	1.40	$723.00
LIT	Litigation	0.30	$265.50
PDS	Plan and Disclosure Statement	14.30	$12,655.50
	Total	**17.00**	**$14,529.00**

EXHIBIT C

Professionals Rendering Services during the Fee Period

The Kutak attorneys who rendered professional services in these cases during the Fee Period include:

Professional	Position	Year Admitted	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Peter J. Barrett	Partner	2000	Bankruptcy, Restructuring and Creditors' Rights	$885.00	16.20	$14,337.00
				Totals	**16.20**	**$14,337.00**

The Kutak paraprofessionals who rendered professional services in these cases during the Fee Period include:

Paraprofessional	Position	Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Charisse Matthews	Paralegal	Bankruptcy, Restructuring and Creditors' Rights	$240.00	0.80	$192.00
			Totals	**0.80**	**$192.00**

EXHIBIT D

Detailed Invoice of Fees and Expenses Incurred During the Fee Period

K U T A K R O C K L L P

RICHMOND, VIRGINIA
Telephone 804-644-1700
Facsimile 804-783-6192

Federal ID 47-0597598

October 13, 2025

Check Remit To:
Kutak Rock LLP
PO Box 30057
Omaha, NE 68103-1157

ACH/Wire Transfer Remit To:
ABA #104000016
First National Bank of Omaha
Kutak Rock LLP
A/C # 24690470
Reference: Invoice No. 3639827
Client Matter No. 133714-1
Notification Email: eftgroup@kutakrock.com

Billed through 08/31/25

Invoice No. 3639827

Hopeman Brothers, Inc.
6 Auburn Ct.
Brookline, MA 02446

Conflicts Counsel

For Professional Legal Services Rendered

BILLING SUMMARY

NAME	HOURS	RATE	AMOUNT
P.Barrett	16.20	885.00	$14,337.00
C.Matthews	0.80	240.00	192.00
TOTAL FEES	17.00		14,529.00
TOTAL DISBURSEMENTS			0.00
TOTAL CURRENT AMOUNT DUE			$14,529.00

KUTAK ROCK LLP

Hopeman Brothers, Inc.
October 13, 2025
Client Matter No. 133714-1
Invoice No. 3639827
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Business Operations

08/06/25	P. Barrett	0.30	265.50	Review of correspondence from debtor's counsel regarding distribution motion and draft reply (.10); review of draft distribution motion (.10); telephone call and draft correspondence to HII's counsel regarding draft motion (.10);
08/07/25	P. Barrett	0.60	531.00	Review of correspondence from HII's counsel regarding conference call and draft reply (.10); review of hold language related to other insurer's funds (.10); draft additional correspondence to HII's counsel regarding same (.10); telephone conference with HII's counsel regarding disbursement motion and draft correspondence to debtor's counsel regarding same (.20); review of final disbursement motion (.10)
08/15/25	P. Barrett	0.10	88.50	Draft correspondence to HII's counsel regarding disbursement motion

Fee/Employment Applications

08/04/25	P. Barrett	0.10	88.50	Review of correspondence from debtor's counsel regarding fee applications and draft correspondence to working group regarding same (.10)
08/05/25	C. Matthews	0.40	96.00	Review billing statement and draft monthly fee statement
08/05/25	P. Barrett	0.40	354.00	Review of fee application exhibit and draft correspondence to Ms. Matthews regarding preparation of application (.20); draft revisions to fee application and draft correspondence to debtor's counsel regarding same (.20)

KUTAK ROCK LLP

Hopeman Brothers, Inc.
October 13, 2025
Client Matter No. 133714-1
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08/08/25	C. Matthews	0.40	96.00	Finalize fee statement and supporting documents for filing with the court (.20); file fee statement (.20)
08/08/25	P. Barrett	0.10	88.50	Review of correspondence from debtor's counsel regarding fee application and draft correspondence to working group regarding same (.10)
Litigation				
08/18/25	P. Barrett	0.10	88.50	Review of response to motion in limine (.10)
08/20/25	P. Barrett	0.20	177.00	Review of reply in support of debtor's motion in limeline (.10); review of entered disbursement order (.10)
Plan and Disclosure Statement				
08/15/25	P. Barrett	1.10	973.50	Review of correspondence from debtor's counsel regarding confirmation order and draft response (.10); draft correspondence to HII's counsel regarding draft order and review of reply (.10); review of draft confirmation order (.90)
08/18/25	P. Barrett	0.80	708.00	Review of correspondence from HII's counsel regarding plan and review of prior correspondence regarding same (.20); draft correspondence to debtor's counsel regarding plan revisions (.10); draft correspondence to HII's counsel regarding confirmation order (.10); review of correspondence from HII's counsel regarding confirmation order and draft correspondence to UCC and debtor counsel regarding same (.10); draft correspondence to HII's counsel regarding requested revisions to plan (.10); draft correspondence to UCC's counsel

KUTAK ROCK LLP

				regarding same (.10); review of FCR's confirmation memorandum (.10)
08/19/25	P. Barrett	0.10	88.50	Review of UCC's comments to confirmation order in HII's language and draft correspondence to HII's counsel regarding same
08/20/25	P. Barrett	0.30	265.50	Draft correspondence to debtor's counsel regarding plan additions (.10); draft various correspondence to HII's counsel regarding same (.10); telephone conference with debtor's counsel regarding confirmation issues (.10)
08/21/25	P. Barrett	4.30	3,805.50	Review of correspondence from UCC counsel regarding plan and draft correspondence to debtor's counsel regarding same (.10); review of redline versions of plan, trust agreement and TDP and compare to HII's comments (.80); draft correspondence to HII's counsel regarding plan and TDP revisions (.10); review of Lascell declaration, Van Epps declaration, Tully declaration, proponents supplemental memorandum in support of confirmation, proposed findings and conclusions, proposed confirmation order and proposed recommendation order (3.10); draft various correspondence to debtor counsel and HII's counsel regarding revisions to plan documents (.20)
08/25/25	P. Barrett	7.70	6,814.50	Review of agenda and parties' witness and exhibit lists (.20); attend confirmation hearing (7.40); draft correspondence to debtor's counsel regarding exhibits and closing argument (.10)
TOTAL HOURS		17.00		

KUTAK ROCK LLP

Hopeman Brothers, Inc.
October 13, 2025
Client Matter No. 133714-1
Invoice No. 3639827
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TOTAL FOR SERVICES RENDERED	$14,529.00

KUTAK ROCK LLP

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KUTAK ROCK LLP

Hopeman Brothers, Inc.
October 13, 2025
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Invoice No. 3639827
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ACTIVITY SUMMARY

ACTIVITY	HOURS	AMOUNT
Business Operations	1.00	$885.00
Fee/Employment Applications	1.40	723.00
Litigation	0.30	265.50
Plan and Disclosure Statement	14.30	12,655.50
TOTAL FEES	17.00	14,529.00

K U T A K R O C K L L P

RICHMOND, VIRGINIA
Telephone 804-644-1700
Facsimile 804-783-6192

Federal ID 47-0597598

October 21, 2026

Check Remit To:
Kutak Rock LLP
PO Box 30057
Omaha, NE 68103-1157

ACH/Wire Transfer Remit To:
ABA #104000016
First National Bank of Omaha
Kutak Rock LLP
A/C # 24690470
Reference: Invoice No. 3832196
Client Matter No. 133714-1
Notification Email: eftgroup@kutakrock.com

Billed through 09/15/26

Invoice No. 3832196

Hopeman Brothers, Inc.
6 Auburn Ct.
Brookline, MA 02446

Conflicts Counsel

For Professional Legal Services Rendered

BILLING SUMMARY

NAME	HOURS	RATE	AMOUNT
P.Barrett	5.60	885.00	$4,956.00
P.Barrett	2.90	930.00	2,697.00
C.Matthews	2.90	240.00	696.00
C.Matthews	2.00	250.00	500.00
TOTAL FEES	13.40		8,849.00
TOTAL DISBURSEMENTS			56.15
TOTAL CURRENT AMOUNT DUE			$8,905.15

Case Administration				
09/17/25	C. Matthews	0.20	48.00	Review and file monthly fee statement
10/14/25	C. Matthews	0.20	48.00	Update and file Monthly Fee Statement of Kutak Rock LLP as Special Conflicts Counsel for the Debtor and Debtor-In-Possession for Services Rendered for the Period from August 1, 2025 Through and Including August 31, 2025
11/12/25	C. Matthews	0.10	24.00	BOP's order approving second interim fee application
11/12/25	C. Matthews	0.70	168.00	Draft and file certificate of no objection
Fee/Employment Applications				
09/15/25	P. Barrett	0.50	442.50	Review of correspondence from debtor's counsel regarding fee application and draft correspondence to working group regarding same (.10); draft fee application and draft correspondence to Ms. Rankin to review (.40)
09/16/25	P. Barrett	0.20	177.00	Review of correspondence from debtor's counsel regarding fee applications, draft revisions to application and exhibit and draft correspondence to debtor's counsel regarding same (.20)
09/17/25	P. Barrett	0.10	88.50	Final review of fee application and exhibits (.10)
10/13/25	P. Barrett	0.40	354.00	Review of correspondence from debtor's counsel regarding fee application and draft correspondence to working group regarding same (.10); draft eighth monthly fee application and prepare exhibits (.30)
10/14/25	P. Barrett	0.60	531.00	Draft additional revisions to August fee application and draft

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				correspondence to debtor's counsel regarding same (.20); telephone conference with debtor's counsel regarding second interim fee application (.10); draft outline of second amended fee application and draft correspondence to Ms. Matthews regarding same (.30)
10/15/25	C. Matthews	0.40	96.00	Draft notice of motion and notice of hearing for second interim fee application
10/15/25	C. Matthews	0.90	216.00	Draft fee application
10/15/25	P. Barrett	0.10	88.50	Review of notice issue regarding second interim application and draft correspondence to working group regarding same (.10)
10/16/25	P. Barrett	2.10	1,858.50	Prepare materials for fee application exhibits (.30); draft revisions to second interim fee application, proposed order and exhibits (1.60); draft correspondence to debtor counsel regarding same (.10); draft revisions to notice of motion and notice of hearing and draft correspondence to debtor counsel (.10)
10/17/25	C. Matthews	0.40	96.00	Review, compile, and file second interim fee application
10/17/25	P. Barrett	0.20	177.00	Draft additional revisions to application and notice and draft correspondence to debtor counsel and Ms. Matthews regarding same (.20)
11/12/25	P. Barrett	0.30	265.50	Review of correspondence from debtor counsel regarding fee application and draft correspondence to working group regarding same (.10); draft revisions to CNO (.10); prepare second interim order (.10)

11/13/25	P. Barrett	0.10	88.50	Telephone conference with law clerk, draft correspondence to UST and draft revisions to order (.10)
08/24/26	P. Barrett	1.10	1,023.00	Review of revise final fee application and correspondence with working group regarding same (1.00); review of materials in connection with final fee application and draft correspondence to debtor's counsel regarding same (.10)
09/15/26	C. Matthews	2.00	500.00	Review bill and draft application for compensation; electronically file and prepare for service
09/15/26	P. Barrett	0.20	186.00	Review of correspondence from debtor counsel and draft correspondence to working group regarding preparation of final fee application (.20)
Litigation				
01/22/26	P. Barrett	0.20	186.00	Review of correspondence from debtor's counsel regarding extension motion and draft reply (.10); telephone conference with debtor's counsel regarding same (.10)
03/17/26	P. Barrett	0.10	93.00	Review of seventh interim stay order for inclusion of HII case
Plan and Disclosure Statement				
10/14/25	P. Barrett	0.10	88.50	Telephone conference with debtor counsel regarding report and recommendation and district court approval (.10)
10/31/25	P. Barrett	0.50	442.50	Review of proposed findings of fact and conclusions of law (.50)
11/20/25	P. Barrett	0.30	265.50	Review of joint response to proposed findings and conclusions and proposed modifications of plan documents (.30)
12/15/25	P. Barrett	0.10	88.50	Review of HII's response to insurers' objections (.10)

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Relief From Stay/Adequate Protection Proceedings

01/21/26	P. Barrett	0.60	558.00	Review of correspondence from HII's counsel regarding relief from stay request and draft response (.10); review of deadline for stay extension and review of order (.20); telephone conference with debtor's counsel regarding further extension (.10); review of EDLA docket (.10); draft correspondence to debtor's counsel regarding same (.10)
01/28/26	P. Barrett	0.60	558.00	Correspondence to and from HII's counsel and debtor regarding stay relief request (.10); review of stay extension order and related timing issue (.20); telephone conference with client regarding HII request (.20); draft correspondence to HII's counsel regarding same (.10)
01/29/26	P. Barrett	0.10	93.00	Review of correspondence from HII's counsel carve out of Gomez case from stay order (.10)
TOTAL HOURS		13.40		

TOTAL FOR SERVICES RENDERED $8,849.00

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DISBURSEMENTS

Pacer - Federal Court Document Fees	18.80
Travel Expenses	37.35
TOTAL DISBURSEMENTS	56.15

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ACTIVITY SUMMARY

ACTIVITY	HOURS	AMOUNT
Case Administration	1.20	$288.00
Fee/Employment Applications	9.60	6,188.00
Litigation	0.30	279.00
Plan and Disclosure Statement	1.00	885.00
Relief From Stay/Adequate Protection Proceedings	1.30	1,209.00
TOTAL FEES	13.40	8,849.00