

HUNTON ANDREWS KURTH LLP
Joseph P. Rovira (*pro hac vice* pending)
Catherine A. Rankin (*pro hac vice* pending)
600 Travis Street, Suite 4200
Houston, Texas 77002
Telephone: (713) 220-4200

HUNTON ANDREWS KURTH LLP
Tyler P. Brown (VSB No. 28072)
Henry P. (Toby) Long, III (VSB No. 75134)
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 788-8200

Proposed Counsel for Debtor and Debtor in Possession

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

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

**NOTICE OF FILING OF REVISED PROPOSED ORDER APPROVING
MOTION OF THE DEBTOR FOR ENTRY OF AN ORDER (I) AUTHORIZING
THE LISTING OF ADDRESSES OF COUNSEL FOR PERSONAL
INJURY CLAIMANTS IN THE CREDITOR MATRIX IN LIEU OF
CLAIMANTS’ ADDRESSES; (II) APPROVING NOTICE PROCEDURES FOR
SUCH CLAIMANTS; AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on June 30, 2024, the above-captioned debtor and debtor in possession (the “Debtor”) filed the *Motion of the Debtor for Entry of an Order (I) Authorizing the Listing of Addresses of Counsel for Personal Injury Claimants in the Creditor Matrix in Lieu of Claimants’ Addresses; (II) Approving Notice Procedures for Such Claimants; and (III) Granting Related Relief* [Docket No. 6]. (the “Motion”) with the United States Bankruptcy Court for the Eastern District of Virginia, which Motion includes a proposed form of order.

PLEASE TAKE FURTHER NOTICE that the Debtor is hereby filing a revised proposed *Order (I) Authorizing the Listing of Addresses of Counsel for Personal Injury Claimants in the Creditor Matrix in Lieu of Claimants’ Addresses; (II) Approving Notice Procedures for Such Claimants; and (III) Granting Related Relief* (the “Revised Proposed Order”), which is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit B** is a redline of the Revised Proposed Order as compared to the original proposed form of order attached to the Motion.



PLEASE TAKE FURTHER NOTICE that copies of the Motion, the Revised Proposed Order, and all other documents filed in this chapter 11 case are available free of charge by: visiting the Debtor's restructuring website at <https://www.veritaglobal.net/hopeman>. You may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <http://www.vaeb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: July 1, 2024
Richmond, Virginia

/s/ Henry P. (Toby) Long, III

Tyler P. Brown (VSB No. 28072)
Henry P. (Toby) Long, III (VSB No. 75134)
HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
Email: tpbrown@HuntonAK.com
hlong@HuntonAK.com

- and -

Joseph P. Rovira (*pro hac vice* pending)
Catherine A. Rankin (*pro hac vice* pending)
HUNTON ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, TX 77002
Telephone: (713) 220-4200
Facsimile: (713) 220-4285
Email: josephrovira@HuntonAK.com
crankin@HuntonAK.com

Proposed Counsel for the Debtor and Debtor in Possession

Exhibit A

Revised Proposed Order

HUNTON ANDREWS KURTH LLP
Joseph P. Rovira (*pro hac vice* pending)
Catherine A. Rankin (*pro hac vice* pending)
600 Travis Street, Suite 4200
Houston, Texas 77002
Telephone: (713) 220-4200

HUNTON ANDREWS KURTH LLP
Tyler P. Brown (VSB No. 28072)
Henry P. (Toby) Long, III (VSB No. 75134)
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 788-8200

Proposed Counsel for Debtor and Debtor in Possession

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

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

ORDER (I) AUTHORIZING THE LISTING OF ADDRESSES OF COUNSEL FOR PERSONAL INJURY CLAIMANTS IN THE CREDITOR MATRIX IN LIEU OF CLAIMANTS' ADDRESSES; (II) APPROVING NOTICE PROCEDURES FOR SUCH CLAIMANTS; AND (III) GRANTING RELATED RELIEF

Upon the motion (the "Motion")¹ of the above-captioned debtor in the above-captioned chapter 11 case (the "Debtor") for entry of an order (this "Order") (i) authorizing the listing of addresses of counsel for personal injury claimants in its creditor matrix in lieu of claimants' addresses; (ii) approving notice procedures for such claimants; and (iii) granting related relief, all as more fully set forth in the Motion; and the Court having reviewed the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334 and the *Standing Order of Reference from the United States District Court for the Eastern District of Virginia*, dated August 15, 1984; and the Court having found that this is a core

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and the Court having determined that there is good and sufficient cause for the relief granted in this order, it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is granted.
2. Pursuant to section 105(a) of the Bankruptcy Code, the Debtor is authorized to list in its creditor matrix the addresses of the Claimants' counsel of record in lieu of the Claimants' addresses to the extent the Claimant has counsel of record, which listing shall satisfy the Debtor's obligations with respect to the Claimants pursuant to Bankruptcy Rule 1007(a)(1). Notwithstanding entry of this Order, nothing herein shall create, nor is intended to create, any rights in favor of or enhance the status of any claim held by any party.
3. Pursuant to section 105(a) of the Bankruptcy Code and 2002(m) of the Bankruptcy Rules, the Claimants Notice Procedures provide for sufficient notice to the Claimants with respect to all matters relating to this chapter 11 case and are hereby approved. The Debtor or its agent shall serve all notices and other communications that are required to be served on the Claimants to the Claimants' respective counsel of record in the manner required pursuant to applicable noticing procedures in effect in this chapter 11 case.
4. The requirement under Local Rule 9013-1(F) to file a memorandum of law in connection with the Motion is waived.

5. The Debtor is authorized to take all actions necessary or appropriate to implement the relief granted in this Order in accordance with the Motion.

6. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

Dated: _____, 2024
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Henry P. (Toby) Long, III

Tyler P. Brown (VSB No. 28072)
Henry P. (Toby) Long, III (VSB No. 75134)
HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
Email: tpbrown@HuntonAK.com
hlong@HuntonAK.com

-and-

Joseph P. Rovira (*pro hac vice* pending)
Catherine A. Rankin (*pro hac vice* pending)
HUNTON ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, TX 77002
Telephone: (713) 220-4200
Facsimile: (713) 220-4285
Email: josephrovira@HuntonAK.com
crankin@HuntonAK.com

Proposed Counsel for the Debtor and Debtor in Possession

SEEN AND NO OBJECTION:

/s/ Kathryn Montgomery

Kathryn Montgomery
Office of The United States Trustee
701 East Broad Street
Suite 4304
Richmond, VA 23219
kathryn.montgomery@usdoj.gov

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/ Henry P. (Toby) Long, III

Exhibit B

Redline

HUNTON ANDREWS KURTH LLP
Joseph P. Rovira (*pro hac vice* pending)
Catherine A. Rankin (*pro hac vice* pending)
600 Travis Street, Suite 4200
Houston, Texas 77002
Telephone: (713) 220-4200

HUNTON ANDREWS KURTH LLP
Tyler P. Brown (VSB No. 28072)
Henry P. (Toby) Long, III (VSB No. 75134)
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 788-8200

Proposed Counsel for Debtor and Debtor in Possession

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

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

ORDER (I) AUTHORIZING THE LISTING OF ADDRESSES OF COUNSEL FOR PERSONAL INJURY CLAIMANTS IN THE CREDITOR MATRIX IN LIEU OF CLAIMANTS' ADDRESSES; (II) APPROVING NOTICE PROCEDURES FOR SUCH CLAIMANTS; AND (III) GRANTING RELATED RELIEF

Upon the motion (the "Motion")¹ of the above-captioned debtor in the above-captioned chapter 11 case (the "Debtor") for entry of an order (this "Order") (i) authorizing the listing of addresses of counsel for personal injury claimants in its creditor matrix in lieu of claimants' addresses; (ii) approving notice procedures for such claimants; and (iii) granting related relief, all as more fully set forth in the Motion; and the Court having reviewed the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334 and the *Standing Order of Reference from the United States District Court for the Eastern District of Virginia*, dated August 15, 1984; and the Court having found that this is a core

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and the Court having determined that there is good and sufficient cause for the relief granted in this order, it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is granted.
2. Pursuant to section 105(a) of the Bankruptcy Code, the Debtor is authorized to list in its creditor matrix the addresses of the Claimants' counsel of record in lieu of the Claimants' addresses [to the extent the Claimant has counsel of record](#), which listing shall satisfy the Debtor's obligations with respect to the Claimants pursuant to Bankruptcy Rule 1007(a)(1). Notwithstanding entry of this Order, nothing herein shall create, nor is intended to create, any rights in favor of or enhance the status of any claim held by any party.
3. Pursuant to section 105(a) of the Bankruptcy Code and 2002(m) of the Bankruptcy Rules, the Claimants Notice Procedures provide for sufficient notice to the Claimants with respect to all matters relating to this chapter 11 case and are hereby approved. The Debtor or its agent shall serve all notices and other communications that are required to be served on the Claimants to the Claimants' respective counsel of record in the manner required pursuant to applicable noticing procedures in effect in this chapter 11 case.
4. The requirement under Local Rule 9013-1(F) to file a memorandum of law in connection with the Motion is waived.

5. The Debtor is authorized to take all actions necessary or appropriate to implement the relief granted in this Order in accordance with the Motion.

6. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

Dated: _____, 2024
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Henry P. (Toby) Long, III

Tyler P. Brown (VSB No. 28072)
Henry P. (Toby) Long, III (VSB No. 75134)
HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
Email: tpbrown@HuntonAK.com
hlong@HuntonAK.com

-and-

Joseph P. Rovira (*pro hac vice* pending)
Catherine A. Rankin (*pro hac vice* pending)
HUNTON ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, TX 77002
Telephone: (713) 220-4200
Facsimile: (713) 220-4285
Email: josephrovira@HuntonAK.com
crankin@HuntonAK.com

Proposed Counsel for the Debtor and Debtor in Possession

SEEN AND NO OBJECTION:

/s/ Kathryn Montgomery

Kathryn Montgomery
Office of The United States Trustee
701 East Broad Street
Suite 4304
Richmond, VA 23219
kathryn.montgomery@usdoj.gov

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/ Henry P. (Toby) Long, III

Summary report:	
Litera Compare for Word 11.5.0.74 Document comparison done on 7/1/2024 2:27:30 PM	
Style name: Firm Standard	
Intelligent Table Comparison: Active	
Original DMS: iw://dms.hunton.com/DMS/307347368/1	
Modified DMS: iw://dms.hunton.com/DMS/307347368/2	
Changes:	
<u>Add</u>	2
Delete	1
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	3