

STEPTOE LLP

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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)

**MOTION FOR ADMISSION OF JEFFERSON KLOCKE
TO PRACTICE PRO HAC VICE UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)**

Joshua R. Taylor (the “Movant”), hereby moves (this “Motion”) the Court, pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia, to enter an order, substantially in the form attached hereto as Exhibit A (the “Order”), authorizing Jefferson Klocke, Esq. (the “Admittee”) to appear pro hac vice in the above captioned case (the “Bankruptcy Case”) and any related proceeding for the purpose of representing The Travelers Indemnity Company; Travelers Casualty and Surety Company, formerly known as The Aetna Casualty and Surety Company; and St. Paul Fire and Marine Insurance Company (collectively, “Travelers”) in the above-captioned chapter 11 case. In support of this Motion, Movant states:



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1. This Court has subject matter jurisdiction to consider this matter under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409.

2. The Movant is a member in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

3. Mr. Klocke is a member in good standing of the bar of the District of Columbia and the Illinois State bar, and an inactive member of the Arizona State bar. He is admitted to practice before the Northern District of Illinois. There are no disciplinary proceedings pending against Mr. Klocke.

4. Pursuant to Local Rule 2090-1(E)(2), “an attorney from another state, the District of Columbia or a territory of the United States may appear and practice in cases pro hac vice before this Court upon motion of a member of the Bar of this Court, provided that in all appearance said attorney shall be accompanied by a member of this Bar. Applicants for pro hac vice admission shall complete a written application, which shall be appended to and incorporated by reference in the aforesaid motion.”

5. Movant requests the Court authorize the Admittee to appear and be heard at hearings and to otherwise participate in the Bankruptcy Case and all related proceedings.

6. The Movant and his law firm will serve as counsel to The Travelers Indemnity Company; Travelers Casualty and Surety Company, formerly known as The Aetna Casualty and Surety Company; and St. Paul Fire and Marine Insurance Company in the Bankruptcy Case and all related proceedings.

7. The Admittee's applications for admission pro hac vice is appended to this Motion as Exhibit B and incorporated by referenced into this Motion.

8. Notice of this Motion will be provided via CM/ECF electronic notification to all parties registered to receive such notice in the Bankruptcy Case as of the time of service. Given the nature of the relief requested, Movant submits that no further notice is necessary.

9. For the reasons explained above, Movant requests that this Court enter an Order (a) authorizing Mr. Klocke to appear pro hac vice in the Bankruptcy Case and all related proceedings on behalf of Travelers and (b) granting the Movant such other and further relief as the Court may deem proper.

Dated: June 10, 2025

STEPTOE LLP

/s/ Joshua R. Taylor

Joshua R. Taylor (VSB No. 45919)

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Exhibit A

Proposed Order

STEPTOE LLP

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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)

**ORDER GRANTING MOTION FOR ADMISSION OF JEFFERSON KLOCKE
TO PRACTICE PRO HAC VICE UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)**

Upon the Motion for Admission to Practice Pro Hac Vice Under Local Bankruptcy Rule 2090-1(E)(3) (the “Motion”) of Joshua R. Taylor with the law firm of Steptoe LLP, for the admission pro hac vice of Jefferson Klocke, the Court finds that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) adequate notice of the Motion has been given and that no other or further notice is necessary; and (iv) good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion.

IT IS HEREBY ORDERED THAT

1. The Motion is GRANTED.
2. Jefferson Klocke is permitted to appear pro hac vice as counsel to The Travelers Indemnity Company; Travelers Casualty and Surety Company, formerly known as The Aetna Casualty and Surety Company; and St. Paul Fire and Marine Insurance Company in the above-captioned chapter 11 case and any related proceeding in accordance with Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia.
3. The Application attached to the Motion as Exhibit B is approved.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2025
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Joshua R. Taylor

STEPTOE LLP

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**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/ Joshua R. Taylor

Exhibit B

Application

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND ☒ DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(3)

In Case No.: 24-32428 (KLP), * Case Name In re: Hopeman Brothers, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) Jefferson Todde Klocke
Bar Identification Number 6339224 State Illinois
Firm Name Steptoe LLP
Firm Phone # 202-429-3000 Direct Dial # 202-327-6954 FAX # 202-429-3902
E-Mail Address jklocke@steptoe.com
Office **Mailing** Address 1330 Connecticut Ave NW, Washington, DC 20036
Name(s) of federal court(s) in which I have been admitted Northern District of Illinois

I am a member in good standing of the Bar of the following United States District Court(s): Northern District of Illinois.

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.



(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.



(Signature)

June 10, 2025

(Date)

Joshua R. Taylor

(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.