

**REAVES PLLC**

Michael G. Wilson (VSB No. 48927)  
555 Belaire Avenue, Suite 300  
Chesapeake, VA 23320  
Telephone: (804) 614-8301  
mike.wilson@reavesgovcon.com

**CAMPBELL & LEVINE, LLC**

David B. Salzman (*Admitted Pro Hac Vice*)  
Kathryn L. Harrison (*Pro Hac Vice Pending*)  
310 Grant Street, Suite 1700  
Pittsburgh, PA 15219  
Telephone (412) 261-0310  
dsalzman@camlev.com  
kharrison@camlev.com

*Proposed Counsel to Marla Rosoff Eskin,  
Future Claimants' Representative*

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

In re:

HOPEMAN BROTHERS, INC.,  
  
Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**CERTIFICATE OF NO OBJECTION REGARDING APPLICATION OF THE  
FUTURE CLAIMANTS' REPRESENTATIVE TO RETAIN AND EMPLOY  
REAVES PLLC AS COUNSEL NUNC PRO TUNC TO MAY 15, 2025  
[Re: D.I. 762]**

The undersigned hereby certifies that, as of the date hereof, he is not aware of any answer, objection, or other responsive pleading with respect to the *Application of the Future Claimants' Representative to Retain and Employ Reaves PLLC Nunc Pro Tunc to May 15, 2025* (the "Application"), which was filed and served by Marla Rosoff Eskin, Esq., the duly-appointed Future Claimants' Representative (the "FCR" or "Applicant") on May 20, 2025. Pursuant to the "Procedures for Complex Chapter 11 Cases in the Eastern District of Virginia," as adopted by Rule 1075-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern



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District of Virginia (“Complex Case Procedures”), any objections to Application were due to be filed on or before June 10, 2025.

The undersigned further certifies that the notice filed with the Application includes a statement that the Application may be granted and an order entered without a hearing unless a timely objection is made. The undersigned further certifies that he has reviewed the Court’s docket in this case and no answer, objection or other responsive pleading to the Application appears thereon, nor is he aware of any informal answer or objection to the Application.

Therefore, pursuant to the notice filed with the Application and the Complex Case Procedures, the Applicant is authorized, and intends, to submit the Order approving the Application to the Court for entry, without further notice or hearing.

[REMAINDER INTENTIONALLY BLANK]

WHEREFORE, in accordance with the Case Management Order, the undersigned respectfully requests that the Court (i) enter the proposed order granting the Application without further notice or hearing, and (ii) grant to the FCR such other and further relief as is just and proper.

Dated: June 15, 2025

Respectfully submitted,

/s/ Michael G. Wilson

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-and-

CAMPBELL & LEVINE, LLC

David B. Salzman, Esq. (*Pro Hac Vice Pending*)

Kathryn L. Harrison, Esq. (*Pro Hac Vice Pending*)

310 Grant Street, Suite 1700

Pittsburgh, Pennsylvania 15219

Tel: 412-261-0310

Fax: 412-261-5066

Email: dsalzman@camlev.com

kharrison@camlev.com

*Proposed Counsel to the Future Claimants'  
Representative*