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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 EXPEDITED HEARING ON
CHUBB INSURERS' MOTION TO ADJOURN
PLAN CONFIRMATION HEARING AND RELATED DEADLINES**

Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America ("Century") and Westchester Fire Insurance Company (on its own behalf and for policies issued by or novated to Westchester Fire Insurance Company) ("Westchester Fire") (Century and Westchester Fire together, the "Chubb Insurers"), hereby move pursuant to 11 U.S.C. § 105(a), Bankruptcy Rule 9006(c), and Local Rules 9013-1(N) and (O) (the "Motion") for an Order setting an expedited hearing on the *Chubb Insurers' Motion to Adjourn Plan Confirmation Hearing and Related Deadlines* (the "Motion to Adjourn") for **June 18, 2025 at 11:00 prevailing Eastern Time** during the already-scheduled omnibus hearing in Debtor's case



and a corresponding deadline of **June 18, 2025 at 9:00 prevailing Eastern Time** for parties to file objection to the Motion and the Motion to Adjourn (the “Objection Deadline”). In support of the Motion, the Chubb Insurers state as follows:

1. On June 17, 2025, the Chubb Insurers filed the Motion to Adjourn requesting that the Court adjourn the hearing on final approval of the Disclosure Statement (Dkt. No. 767) and confirmation of Debtor’s proposed Plan of Reorganization (Dkt. No. 766), along with the related June 23, 2025 Objection Deadline, for at least sixty (60) days.

2. As explained in the Motion to Adjourn, the Chubb Insurers have worked diligently in attempt to adhere to the highly compressed confirmation schedule requested by Debtor and set by the Court (Dkt. No. 782) (the “Scheduling Order”). Despite Debtor’s representations to the Chubb Insurers and the Court that it would “proceed with utmost speed to provide non-privileged responsive documents” (Dkt. No. 759, p. 13 n. 6) and produce documents on a rolling basis in response to the Chubb Insurers’ confirmation-related discovery requests, that did not occur. Debtor produced 7,000 pages of documents on June 5, 2025, and has made two additional productions since then.

3. As further described in the Motion to Adjourn, the Chubb Insurers have significant issues to resolve with Debtor and the Committee regarding their discovery responses and document productions. Most urgently, the Committee has not searched for or produced a single document in response to the Chubb Insurers’ requests, including documents from its financial consultant, FTI, which Debtor and the Committee have identified as a witness to be called at the confirmation hearing. The Chubb Insurers cannot proceed with depositions until the issues regarding Debtor’s and the Committee’s document productions are resolved. The Chubb Insurers cannot prepare its Confirmation Objections and set forth “any relevant and admissible evidence in support of the

objection” as required by the Solicitation Procedures Order (Dkt. No. 782, ¶ 3) if the Chubb Insurers have not yet obtained the evidence they require to support their objections. Accordingly, as the Court expressly authorized during the May 21, 2025 hearing on the Solicitation Procedures Motion, the Chubb Insurers have filed the Motion to Adjourn.

4. The Objection Deadline is six days away. The Confirmation Hearing is currently two weeks away. It is impossible that the Chubb Insurers will resolve discovery disputes with Debtor and the Committee, obtain and review a document production from the Committee, take depositions, and prepare and file evidence-based objections by July 1, 2025, much less by the June 23, 2025 deadline. An expedited hearing on the Motion to Adjourn is necessary and appropriate under the circumstances.

5. Notice of this Motion will be given pursuant to Local Rule 1075-1 and the procedures set forth in Article II of the “Procedures for Complex Cases in the Eastern District of Virginia.” The Chubb Insurers submit that, in light of the nature of the relief requested, no other or further noticed need be given.

WHEREAS, the Chubb Insurers request that the Court enter the Proposed Order granting an expedited hearing on the Motion to Adjourn and such other relief as this Court determines just and proper.

Dated: June 17, 2025

Respectfully submitted,

/s/ Dabney J. Carr
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Company and Westchester Fire
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CERTIFICATION

Pursuant to Bankruptcy Local Rule 9013-1(N), I certify that the Chubb Insurers:

1. have carefully examined this matter and concluded that there is a true need for an emergency hearing;
2. have not created the emergency through the lack of diligence; and
3. have made a bona fide effort to resolve the matter without a hearing.

/s/ Dabney J. Carr

Dabney J. Carr

EXHIBIT A

(Proposed Order)

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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
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In re:

HOPEMAN BROTHERS, INC.,

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**ORDR SETTING AN EXPEDITED HEARING ON CHUBB INSURERS' MOTION TO
ADJOURN PLAN CONFIRMATION HEARING AND RELATED DEADLINES**

Upon the Chubb Insurers' motion (the "Motion to Expedite") for entry of an order (this "Order") setting an expedited hearing on the Motion to Adjourn and granting related relief, and the Court having jurisdiction to consider the Motion and the relief requested therein; and it appearing that proper and adequate notice of the Motion to Expedite has been given and no other or further notice is necessary; and up on 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 relief requested in the Motion is hereby granted.
2. A hearing shall be held on June 18, 2025 at 11:00 a.m. (prevailing Eastern Time) to hear and consider the Motion to Adjourn and the Motion to Expedite (collectively, the “Motions”).
3. The deadline by which parties must file objections to the Motions is June 18, 2025 at 9:00 a.m. (prevailing Eastern Time).
4. The Chubb Insurers are authorized to take all actions necessary to implement the relief granted in this Order.
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:

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