

CAPLIN & DRYSDALE, CHARTERED
Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
Jeffrey A. Liesemer (VSB No. 35918)
Nathaniel R. Miller (admitted *pro hac vice*)
1200 New Hampshire Avenue, NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000

*Counsel for the Official Committee
of Unsecured Creditors*

MORGAN, LEWIS & BOCKIUS LLP
Brady Edwards (admitted *pro hac vice*)
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5006
Telephone: (713) 890-5000

W. Brad Nes (admitted *pro hac vice*)
1717 Main Street, Suite 3200
Dallas, TX 75201-7347
Telephone: (214) 466-4000

Jeffrey S. Raskin (admitted *pro hac vice*)
One Market, Spear Street Tower, 28th Floor
San Francisco, CA 94105-1596
Telephone: (415) 442-1000

*Special Insurance Counsel for the Official
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**CERTIFICATION OF NO OBJECTION
AND NOTICE OF FILING OF REVISED PROPOSED ORDER**

On January 15, 2026, Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”)¹ filed the *Sixth Interim Fee Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of September 1, 2025 through November 30, 2025* [Docket No. 1368] (“**Application**”) with the United States Bankruptcy Court

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



for the Eastern District of Virginia. A proposed form of order is annexed to the Application (the “**Original Proposed Order**”).

The undersigned certifies that the Application was filed and served in accordance with the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 162] (the “**Interim Compensation Order**”) and 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 District of Virginia. Pursuant to the Interim Compensation Order and the notice served with the Application, all objections to the approval of the relief requested in the Application were due on or before February 11, 2026.

In response to informal comments received from the U.S. Trustee, Morgan Lewis has made certain revisions to the Original Proposed Order and hereby is filing a revised form of order granting the Application (the “**Revised Proposed Order**”), attached hereto as Exhibit A. Also attached as Exhibit B is a redline of the Revised Proposed Order compared to the Original Proposed Order.

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 caused a review of 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 Interim Compensation Order, Morgan Lewis is authorized, and intends, to submit the Revised Proposed Order, without

further notice or hearing. The United States Trustee has reviewed and authorized Morgan Lewis to add her endorsement to the Revised Proposed Order.

Dated: February 12, 2026

CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)

Todd E. Phillips (admitted *pro hac vice*)

Jeffrey A. Liesemer (VSB No. 35918)

Nathaniel R. Miller (admitted *pro hac vice*)

1200 New Hampshire Avenue NW, 8th Floor

Washington, DC 20036

Telephone: (202) 862-5000

Facsimile: (202) 429-3301

Email: kmaclay@capdale.com

tphillips@capdale.com

jliesemer@capdale.com

nmiller@capdale.com

Counsel to the Official

Committee of Unsecured Creditors

MORGAN, LEWIS & BOCKIUS LLP

Brady Edwards (admitted *pro hac vice*)

1000 Louisiana Street, Suite 4000

Houston, TX 77002-5006

Telephone: (713) 890-5000

Facsimile: (713) 890-5001

Email: brady.edwards@morganlewis.com

W. Brad Nes (admitted *pro hac vice*)

1717 Main Street, Suite 3200

Dallas, TX 75201-7347

Telephone: (214) 466-4000

Facsimile: (214) 466-4001

Email: brad.nes@morganlewis.com

Jeffrey S. Raskin (admitted *pro hac vice*)

One Market, Spear Street Tower, 28th Floor

San Francisco, CA 94105-1596

Telephone: (415) 442-1000

Facsimile: (415) 442-1001

Email: jeffrey.raskin@morganlewis.com

Special Insurance Counsel to the Official

Committee of Unsecured Creditors

EXHIBIT

A

CAPLIN & DRYSDALE, CHARTERED
Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
Jeffrey A. Liesemer (VSB No. 35918)
Nathaniel R. Miller (admitted *pro hac vice*)
1200 New Hampshire Avenue, NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000

*Counsel for the Official
Committee of Unsecured Creditors*

MORGAN, LEWIS & BOCKIUS LLP
Brady Edwards (admitted *pro hac vice*)
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5006
Telephone: (713) 890-5000

W. Brad Nes (admitted *pro hac vice*)
1717 Main Street, Suite 3200
Dallas, TX 75201-7347
Telephone: (214) 466-4000

Jeffrey S. Raskin (admitted *pro hac vice*)
One Market, Spear Street Tower, 28th Floor
San Francisco, CA 94105-1596
Telephone: (415) 442-1000

*Special Insurance Counsel for the Official
Committee of Unsecured Creditors*

**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 THE SIXTH INTERIM FEE APPLICATION OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
INTERIM PERIOD OF SEPTEMBER 1, 2025 THROUGH NOVEMBER 30, 2025**

Under consideration of the *Sixth Interim Fee Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of September 1, 2025 through November 30, 2025* (the “**Application**”);¹ and the Court having reviewed the Application that was served by the Committee, and finding that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining that proper

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

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 therefor,

IT IS HEREBY ORDERED as follows:

1. The Application is GRANTED.
2. Morgan Lewis is hereby granted interim allowance of compensation for professional services in the amount of \$41,253.40 for professional services rendered and reimbursement for expenses incurred for the period from September 1, 2025 through November 30, 2025, in the amount of \$34,889.00 in fees and \$6,364.40 in expenses.²
3. The Debtor is hereby authorized and directed to remit to Morgan Lewis all unpaid fees and expenses allowed pursuant to this Order.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.
5. This Order shall be immediately effective and enforceable upon its entry.

Dated: _____, 2026
Richmond, Virginia

HONORABLE KEITH L. PHILLIPS
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: _____

² This includes a reduction of \$3,567.00 in fees, as agreed upon by Morgan Lewis and the Office of the United States Trustee, in response to informal comments from the Office of the United States Trustee regarding the Fee Application.

WE ASK FOR THIS:

CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
Jeffrey A. Liesemer (VSB No. 35918)
Nathaniel R. Miller (admitted *pro hac vice*)
1200 New Hampshire Avenue NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000
Facsimile: (202) 429-3301
Email: kmaclay@capdale.com
tphillips@capdale.com
jliesemer@capdale.com
nmiller@capdale.com

*Counsel to the Official
Committee of Unsecured Creditors*

MORGAN, LEWIS & BOCKIUS LLP

Brady Edwards (admitted *pro hac vice*)
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5006
Telephone: (713) 890-5000
Facsimile: (713) 890-5001
Email: brady.edwards@morganlewis.com

W. Brad Nes (admitted *pro hac vice*)
1717 Main Street, Suite 3200
Dallas, TX 75201-7347
Telephone: (214) 466-4000
Facsimile: (214) 466-4001
Email: brad.nes@morganlewis.com

Jeffrey S. Raskin (admitted *pro hac vice*)
One Market, Spear Street Tower, 28th Floor
San Francisco, CA 94105-1596
Telephone: (415) 442-1000
Facsimile: (415) 442-1001
Email: jeffrey.raskin@morganlewis.com

*Special Insurance Counsel to the Official
Committee of Unsecured Creditors*

SEEN SUBJECT TO THE U.S. TRUSTEE'S RIGHT TO OBJECT TO THE FINAL FEE APPLICATION:

/s/ B. Webb King

B. Webb King (VSB No. 47044)
Trial Attorney
Office of the United States Trustee
210 First Street, Suite 505
Roanoke, Virginia 24011
Phone: 540-857-2838
Fax: 540-857-2844
Email: Webb.King@usdoj.gov

Office of the 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/ Jeffrey A. Liesemer

EXHIBIT

B

CAPLIN & DRYSDALE, CHARTERED
Kevin C. Maclay (admitted *pro hac vice*)
Todd E. Phillips (admitted *pro hac vice*)
Jeffrey A. Liesemer (VSB No. 35918)
Nathaniel R. Miller (admitted *pro hac vice*)
1200 New Hampshire Avenue, NW, 8th Floor
Washington, DC 20036
Telephone: (202) 862-5000

*Counsel for the Official
Committee of Unsecured Creditors*

MORGAN, LEWIS & BOCKIUS LLP
Brady Edwards (admitted *pro hac vice*)
1000 Louisiana Street, Suite 4000
Houston, TX 77002-5006
Telephone: (713) 890-5000

W. Brad Nes (admitted *pro hac vice*)
1717 Main Street, Suite 3200
Dallas, TX 75201-7347
Telephone: (214) 466-4000

Jeffrey S. Raskin (admitted *pro hac vice*)
One Market, Spear Street Tower, 28th Floor
San Francisco, CA 94105-1596
Telephone: (415) 442-1000

*Special Insurance Counsel for the Official
Committee of Unsecured Creditors*

**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 THE SIXTH INTERIM FEE APPLICATION OF
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
INTERIM PERIOD OF SEPTEMBER 1, 2025 THROUGH NOVEMBER 30, 2025**

Under consideration of the *Sixth Interim Fee Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of September 1, 2025 through November 30, 2025* (the “**Application**”);¹ and the Court having reviewed the Application that was served by the Committee, and finding that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining

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

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 therefor,

IT IS HEREBY ORDERED as follows:

1. The Application is GRANTED.

2. Morgan Lewis is hereby granted interim allowance of compensation for professional services in the amount of ~~\$44,820.40~~41,253.40 for professional services rendered and reimbursement for expenses incurred for the period from September 1, 2025 through November 30, 2025, in the amount of ~~\$38,456.00~~34,889.00 in fees and \$6,364.40 in expenses.²

3. The Debtor is hereby authorized and directed to remit to Morgan Lewis all unpaid fees and expenses allowed pursuant to this Order.

4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

5. This Order shall be immediately effective and enforceable upon its entry.

Dated: _____, 2026
Richmond, Virginia

HONORABLE KEITH L. PHILLIPS
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: _____

² This includes a reduction of \$3,567.00 in fees, as agreed upon by Morgan Lewis and the Office of the United States Trustee, in response to informal comments from the Office of the United States Trustee regarding the Fee Application.

WE ASK FOR THIS:

CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)

Todd E. Phillips (admitted *pro hac vice*)

Jeffrey A. Liesemer (VSB No. 35918)

Nathaniel R. Miller (admitted *pro hac vice*)

1200 New Hampshire Avenue NW, 8th Floor

Washington, DC 20036

Telephone: (202) 862-5000

Facsimile: (202) 429-3301

Email: kmaclay@capdale.com

tphillips@capdale.com

jliesemer@capdale.com

nmiller@capdale.com

Counsel to the Official

Committee of Unsecured Creditors

MORGAN, LEWIS & BOCKIUS LLP

Brady Edwards (admitted *pro hac vice*)

1000 Louisiana Street, Suite 4000

Houston, TX 77002-5006

Telephone: (713) 890-5000

Facsimile: (713) 890-5001

Email: brady.edwards@morganlewis.com

W. Brad Nes (admitted *pro hac vice*)

1717 Main Street, Suite 3200

Dallas, TX 75201-7347

Telephone: (214) 466-4000

Facsimile: (214) 466-4001

Email: brad.nes@morganlewis.com

Jeffrey S. Raskin (admitted *pro hac vice*)

One Market, Spear Street Tower, 28th Floor

San Francisco, CA 94105-1596

Telephone: (415) 442-1000

Facsimile: (415) 442-1001

Email: jeffrey.raskin@morganlewis.com

*Special Insurance Counsel to the Official
Committee of Unsecured Creditors*

SEEN SUBJECT TO THE U.S. TRUSTEE'S RIGHT TO OBJECT TO THE FINAL FEE APPLICATION:

/s/ B. Webb King

B. Webb King (VSB No. 47044)

Trial Attorney

Office of the United States Trustee

210 First Street, Suite 505

Roanoke, Virginia 24011

Phone: 540-857-2838

Fax: 540-857-2844

Email: Webb.King@usdoj.gov

Office of the 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/ Jeffrey A. Liesemer