

**REAVES PLLC**

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*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 AND NOTICE OF FILING  
OF PROPOSED ORDER FOR FIRST INTERIM FEE  
APPLICATION OF REAVES PLLC FOR THE ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES  
AS COUNSEL TO THE FUTURE CLAIMANTS' REPRESENTATIVE  
FOR THE PERIOD MAY 15, 2025 THROUGH AUGUST 31, 2025**

**[Re: D.I. 1382]**

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 *First Interim Fee Application of Reaves PLLC for the Allowance of Compensation and Reimbursement of Expenses as Counsel to the Future Claimants' Representative for the Period May 15, 2025 Through August 31, 2025* [D.I. 1382] (the "Application"), which was filed and served on January 28, 2026. 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 District of Virginia (“Complex Case Procedures”), any objections to Application were due to be filed on or before February 11, 2026.

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 an order, substantially in the form attached hereto as Exhibit A, granting the Application without further notice or hearing, and (ii) grant to the applicant such other and further relief as is just and proper.

Dated: February 13, 2026

Respectfully submitted,

/s/ Michael G. Wilson  
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-and-

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*Counsel to the Future Claimants'  
Representative*

**EXHIBIT A**

**Proposed Order**

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**ORDER APPROVING FIRST INTERIM FEE APPLICATION OF  
REAVES PLLC FOR THE ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE FUTURE CLAIMANTS'  
REPRESENTATIVE FOR THE PERIOD MAY 15, 2025 THROUGH AUGUST 31, 2025**  
**[RE D.I. 1382]**

Upon the *First Interim Fee Application of Reaves PLLC for the Allowance of Compensation and Reimbursement of Expenses as Counsel to the Future Claimants' Representative for the Period May 15, 2025 Through August 31, 2025* [D.I. 1382] (the "Application")<sup>1</sup>; and the Court having considered the Application, any responsive pleadings and arguments of counsel, if any; and, the Court having determined that it has jurisdiction to consider the Application, that notice of the Application was appropriate, and that the relief sought therein is just and proper; and, after due opportunity for a hearing on the Application, it is hereby ORDERED that:

1. The Application is GRANTED.
2. The Reaves Firm is allowed interim compensation in the amount of \$47,283.00 and reimbursement of expenses in the amount of \$110.70 for the Interim Fee Period as requested in the Application.

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<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed them in the Application.

3. The Debtor is authorized and directed to disburse to the Reaves firm payment in the amount of the difference between the allowed amounts and the actual monthly payments previously received by the Reaves Firm for fees and expenses incurred during the Interim Fee Period.

4. The Debtor is authorized to take all actions necessary to implement the relief granted by this Court.

5. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

6. This Order shall be immediately effective and enforceable upon entry, notwithstanding any provision on the Bankruptcy Code or Bankruptcy Rule to the contrary.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Keith L. Phillips  
United States Bankruptcy Judge

**WE ASK FOR THIS:**

/s/ Michael Wilson  
**REAVES PLLC**  
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*Counsel to the Future Claimants’  
Representative*  
**SEEN:**

/s/ B. Webb King (w/permission via email to counsel for the FCR)  
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*Office of the Unites States Trustee*

**CERTIFICATION UNDER LOCAL BANKRUPTCY RULE 9022-1(C)**

Pursuant to 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/ Michael Wilson