

**HUNTON ANDREWS KURTH LLP**

Joseph P. Rovira (admitted *pro hac vice*)  
Catherine A. Rankin (admitted *pro hac vice*)  
600 Travis Street, Suite 4200  
Houston, Texas 77002  
Telephone: (713) 220-4200

**HUNTON ANDREWS KURTH LLP**

Tyler P. Brown (VSB No. 28072)  
Henry P. (Toby) Long, III (VSB No. 75134)  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219  
Telephone: (804) 788-8200

*Counsel for Debtor and Debtor in Possession*

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

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**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

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: **Chapter 11**  
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: **Case No. 24-32428 (KLP)**  
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:  
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**NOTICE OF MOTIONS AND NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that on April 29, 2025, Hopeman Brothers, Inc. (the “Debtor”) filed the following motions (together, the “Motions”) with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “Court”):

- (i) *Motion to Approve Stipulated Order Approving Settlement of Appeal of Insurance Settlement Order and Granting Limited Relief from Third Interim Stay Order;*
- (ii) *Joint Application of the Debtor and Official Committee of Unsecured Creditors for an Order Appointing Marla Rosoff Eskin, Esq. as Future Claimants’ Representative; and*
- (iii) *Joint Motion of the Debtor and Official Committee of Unsecured Creditors for Entry of an Order (I) Scheduling a Combined Hearing to Approve the Disclosure Statement and Confirm the Plan; (II) Conditionally Approving the Disclosure Statement (III) Establishing Objection Deadlines; (IV) Approving the Form and Manner of Notice; (V) Approving the Solicitation and Tabulation Procedures; and (VI) Granting Related Relief.*

**PLEASE TAKE FURTHER NOTICE** that a copy of the Motions may be obtained at no charge at <https://www.veritaglobal.net/hopeman> or for a fee at <https://ecf.vaeb.uscourts.gov>.



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**PLEASE TAKE FURTHER NOTICE** that your rights may be affected. You should read the Motions carefully and discuss them with your attorney, if you have one in the chapter 11 case. If you do not have an attorney, you may wish to consult one.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Rule 1075-1 of the Local Bankruptcy Rules (the “Local Bankruptcy Rules”), the Court has adopted the “Procedures for Complex Chapter 11 Cases in the Eastern District of Virginia” (the “Case Management Procedures”), which prescribe the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Procedures is available by visiting <https://www.vaeb.uscourts.gov/vaeb-local-rules>.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested in the Motions, or if you want the Court to consider your views on the Motions, then, by **May 10, 2025** (the “Response Deadline”), you or your attorney must:

- ☒ File with the Court, either electronically or at the address shown below, a written response to the Motions pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Response Deadline.

**If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motions as conceded and enter appropriate order granting the requested relief without further notice or hearing.**

Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, Virginia 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written response on the Debtor so that the response is received on or before the Response Deadline.

- ☒ Attend the hearing before the Honorable Keith L. Phillips, United States Bankruptcy Judge, at **11:00 a.m. (prevailing Eastern Time) on May 13, 2025**, in Courtroom 5100 of the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, 5<sup>th</sup> Floor, Richmond, Virginia 23219.

**PLEASE TAKE FURTHER NOTICE** that you should consult the Case Management Procedures before filing any written response to the Motions.

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Dated: April 29, 2025  
Richmond, Virginia

/s/ Henry P. (Toby) Long, III

Tyler P. Brown (VSB No. 28072)

Henry P. (Toby) Long, III (VSB No. 75134)

**HUNTON ANDREWS KURTH LLP**

Riverfront Plaza, East Tower

951 East Byrd Street

Richmond, Virginia 23219

Telephone: (804) 788-8200

Facsimile: (804) 788-8218

Email: tpbrown@HuntonAK.com

hlong@HuntonAK.com

- and -

Joseph P. Rovira (admitted *pro hac vice*)

Catherine A. Rankin (admitted *pro hac vice*)

**HUNTON ANDREWS KURTH LLP**

600 Travis Street, Suite 4200

Houston, TX 77002

Telephone: (713) 220-4200

Facsimile: (713) 220-4285

Email: josephrovira@HuntonAK.com

crankin@HuntonAK.com

*Counsel for the Debtor and Debtor in Possession*