UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:	:	**Chapter 11**
HOPEMAN BROTHERS, INC.,	:	**Case No. 24-32428 (KLP)**
Debtor.	:	

NOTICE OF COMBINED HEARING FOR APPROVAL OF DISCLOSURE STATEMENT AND CONFIRMATION OF PLAN

YOU ARE RECEIVING THIS NOTICE BECAUSE YOUR RIGHTS MAY BE AFFECTED BY THE PLAN. THEREFORE, YOU SHOULD READ THIS NOTICE CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

PLEASE TAKE NOTICE THAT on May 21, 2025, Hopeman Brothers, Inc. ("Hopeman") and the Official Committee of Unsecured Creditors (the "Committee," and together with Hopeman, the "Plan Proponents") filed the *Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code* [Docket No. 766] (as may be modified from time to time, the "Plan") and the *Disclosure Statement with Respect to the Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code* [Docket No. [767] (as may be modified from time to time, the "Disclosure Statement").

On May 21, 2025, the Court entered an order [Docket No. 782] (the "Solicitation Procedures Order")[1] (a) conditionally approving the Disclosure Statement as containing "adequate information" pursuant to section 1125 of the Bankruptcy Code, (b) approving the Solicitation Procedures, (c) approving the solicitation materials and notices to be distributed in connection with the solicitation of the Plan, and (d) authorizing Hopeman to solicit votes on the Plan, among other things.

The hearing at which the Court will consider approval of the Disclosure Statement on a final basis and confirmation of the Plan (the "Combined Hearing") will be held on **July 1, 2025 at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Keith L. Phillips in the United States Bankruptcy Court for the Eastern District of Virginia, 701 East Broad Street, Courtroom 5100, Richmond, Virginia 23219-1888. The Combined Hearing may be continued or adjourned from time to time by the Court or the Plan Proponents without further notice other than as may be announced in open court or by notice filed on the docket in this chapter 11 case.

[1] Capitalized terms used but no defined herein have the meanings given to them in the Plan, Disclosure Statement, or Disclosure Statement order, as applicable.

INFORMATION REGARDING VOTING ON THE PLAN

Voting Record Date. The Voting Record Date is **May 21, 2025**. All holders of Claims in Classes 3 and 4 as of the Voting Record Date are entitled to vote to accept or reject the Plan.

Voting and Release Opt-In Deadline. The deadline for submitting votes to accept or reject the Plan is **June 12, 2025, at 4:00 p.m. (prevailing Eastern Time)**. If you received a Solicitation Package with a Ballot or Master Ballot and intend to vote on the Plan, you **must** (a) follow the instructions in your Ballot or Master Ballot carefully; (b) complete all the required information on the Ballot or Master Ballot; and (c) execute and return you Ballot or Master Ballot so that it is ***actually received*** by Hopeman's claims, noticing, and administrative agent, Kurtzman Carson Consulting LLC d/b/a Verita Global (the "Balloting Agent"), on or before the Voting and Release Opt-In Deadline. ***If you return your Ballot or Master Ballot after the Voting and Release Opt-In Deadline or fail to follow the instructions included with your Ballot or Master Ballot, your vote may not be counted***.

INFORMATION REGARDING OBJECTING TO THE PLAN

Article X of the Plan contains release, exculpation, and injunction provisions. For a description of the causes of action to be enjoined and the identities of the entities that would be subject to the injunctions, please see Article VIII.H of the Disclosure Statement and Article X of the Plan. You are advised to review and consider the Plan carefully because your rights might be affected thereunder even if you abstain from voting.

Objection Deadline. The deadline for filing objections to final approval of the Disclosure Statement and confirmation of the Plan is **June 23, 2025, at 4:00 p.m. (prevailing Eastern Time**) (the "Confirmation Objection Deadline"). All objections to final approval of the Disclosure Statement and confirmation of the Plan **must** (a) be in writing, (b) set forth in detail the name and address of any party filing the objection, the grounds for the objection, any relevant and admissible evidence in support of the objection, and the amount of the objector's claim(s) or such other grounds that give the objector standing to assert the objection, (c) conform to the Bankruptcy Rules and the Bankruptcy Local Rules, (d) be filed with the Court, and (e) served in accordance with the Bankruptcy Rules and Bankruptcy Local Rules upon the Notice Parties (defined below) so as to be actually received on or before the Confirmation Objection Deadline. ***Any objection not properly and timely filed shall be deemed to be waived and to be consent to the entry of an order confirming the Plan***.

Objections to confirmation of the Plan must be served on the following parties (the "Notice Parties"):

a. Counsel to Hopeman: Hunton Andrews Kurth LLP, (i) Riverfront Plaza, East Tower, 951 East Byrd Street, Richmond, VA 23219 (Attn: Tyler P. Brown (tpbrown@HuntonAK.com) and Henry P. (Toby) Long, III (hlong@HuntonAK.com)) and (ii) 600 Travis Street, Suite 4200, Houston, TX 77002 (Attn: Joseph P. Rovira (josephrovira@HuntonAK.com) and Catherine A. Rankin (crankin@HuntonAK.com)).

b. Counsel to the Committee: Caplin & Drysdale, Chartered, 1200 New Hampshire Avenue, NW, 8th Floor, Washington, DC 20036 (Attn: Kevin C. Maclay (kmaclay@capdale.com), Todd E. Phillips (tphillips@capdale.com), Jeffrey A. Liesemer (jliesemer@capdale.com), and Nathaniel R. Miller (nmiller@capdale.com)).

c. Future Claimants' Representative: Campbell & Levine, LLC, 222 Delaware Avenue, Suite 1620, Wilmington, DE 19801 (Attn: Marla Rosoff Eskin (meskin@camlev.com)).

d. Office of the United States Trustee for the Eastern District of Virginia: 701 East Broad Street, Suite 4304, Richmond, VA 23219 (Attn: Kathryn R. Montgomery (kathryn.montgomery@usdoj.gov).

IMPORTANT INFORMATION REGARDING ASBESTOS CLAIMS

Proof of an Asbestos Claim does not have to be filed with the Bankruptcy Court at this time. The Bankruptcy Court has established special procedures for holders of Asbestos Claims to vote on the Plan. Lawyers for holders of Asbestos Claims may vote on the Plan on behalf of their clients if the lawyers are authorized to do so. If you are unsure whether your lawyer is authorized to vote on your behalf, please contact your lawyer.

If you (i) believe you hold an Asbestos Claim but did not assert such Claim against Hopeman prior to the Petition Date and (ii) wish to vote to accept or reject the Plan, you may obtain a ballot by submitting an inquiry to the Balloting Agent through the following webpage link: https://www.veritaglobal.net/hopeman/inquiry. Claimants who timely submit a completed ballot to the Balloting Agent via the following e-mail address: hopemanballots@veritaglobal.com by no later than **June 12, 2025 at 4:00 p.m. (prevailing Eastern Time)** shall each be deemed holders of Class 4 Claims and each such Claim will be temporarily allowed, **for voting purposes only**, in the amount of **$1.00** per claimant, unless the Claim is the subject of an objection.

HOW TO OBTAIN ADDITIONAL INFORMATION

If you received Solicitation Package materials in electronic format and desire paper copies, if you need to obtain additional Solicitation Packages, or if you have any questions, you may contact the Balloting Agent by: (i) accessing Hopeman's restructuring website at https://www.veritaglobal.net/hopeman; (ii) writing to Hopeman Brothers, Inc. c/o Kurtzman Carson Consultants LLC d/b/a Verita Global, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245; (iii) calling (877) 709-4752 (toll free) or +1 (424) 236-7232 (international); or (iv) submit an inquiry here: https://www.veritaglobal.net/hopeman/inquiry. You may also access any pleadings filed in this chapter 11 case for a fee via PACER on the Bankruptcy Court's website at www.vaeb.uscourts.gov.

Please note that the Balloting Agent cannot provide you with legal or financial advice. You are strongly encouraged to review the terms of the Disclosure Statement and the Plan and to consult with your legal and financial advisors regarding your rights.

Dated: May 21, 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

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

David Cox (admitted pro hac vice)
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
Telephone: (213) 612-7315
Facsimile: (213) 612-2501
david.cox@morganlewis.com

Special Insurance Counsel to the Official Committee of Unsecured Creditors