Docket #1563 Date Filed: 10/20/2026

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Co-Counsel for the Reorganized Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

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

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia, Neil E. McCullagh ("Movant") respectfully moves for the admission of Joseph E. Lehnert (the "Proposed Admittee") to appear *pro hac vice* in the above-captioned cases as counsel on behalf of Hopeman Brothers, Inc. (the "Reorganized Debtor") (the "Motion"). In support of the Motion, as demonstrated by the attached application of the Proposed Admittee, the Movant respectfully states as follows:

1. The Proposed Admittee is a member in good standing of the Bar of the State of Ohio (Bar #0089492).

2. The Proposed Admittee is admitted to practice in the following federal courts: U.S. District Courts for the Southern District of Ohio and the Northern District of Ohio.

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3. The Proposed Admittee has never been disbarred, suspended, or denied admission to practice.

4. The Proposed Admittee understandings that if he is admitted *pro hac vice* to practice before this Court, he will be subject to the disciplinary jurisdiction of this Court.

5. A copy of the Proposed Admittee's written application as required by Local Bankruptcy Rule 2090-1(E)(3) is attached hereto as **Exhibit A** and incorporated herein by reference.

6. Co-counsel for the Proposed Admittee in these proceedings will be the undersigned, who has been formally admitted to the bar of this Court. As co-counsel, the undersigned will comply with all requirements of Rule 2090 of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia.

7. Notice of this Motion is being provided to all parties via CM/ECF. Due to the administrative nature of the Motion, Movant submits that no further notice is required.

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WHEREFORE, Movant respectfully requests that the Court approve the admission of Joseph E. Lehnert in the above-captioned cases as counsel for the Debtor.

Dated: October 20, 2026

HOPEMAN BROTHERS, INC.

/s/ Neil E. McCullagh

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- and –

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Co-Counsel for the Reorganized Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 20, 2026, a copy of the foregoing Motion was filed and served via the Court's Electronic Case Filing System on all parties receiving such notification.

/s/ Neil E. McCullagh

Exhibit A

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)

In Case No.: 24-32428 (KLP) **,* Case Name** In re Hopeman Brothers, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) Joseph Edward Lehnert
Bar Identification Number 0089492 State OH
Firm Name Keating Muething & Klekamp PLL
Firm Phone # 513-579-6400 Direct Dial # 513-639-3929 FAX # 513-579-6457
E-Mail Address jlehnert@kmklaw.com
Office **Mailing** Address 1 E 4th St, Ste 1400, Cincinnati, OH 45202
Name(s) of federal court(s) in which I have been admitted 6th Circuit COA; 2nd Circuit COA; S.D. Ohio; N.D. Ohio

I am a member in good standing of the Bar of the following United States District Court(s):
Southern District of Ohio and Northern District of Ohio.

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

/s/ Joseph E. Lehnert
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

/s/ Neil E. McCullagh
(Signature)

October 20, 2026
(Date)

Neil E. McCullagh
(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

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

ORDER GRANTING MOTION FOR ADMISSION *PRO HAC VICE*

THIS MATTER comes before the Court upon the motion of Neil E. McCullagh requesting entry of an order permitting Joseph E. Lehnert to appear *pro hac vice* in the above-captioned case as counsel on behalf of Hopeman Brothers, Inc. (the "Reorganized Debtor") (the "Motion"). Based upon representations set forth in the Motion and finding it otherwise proper, the Court

ORDERS that the Motion is granted; and

ORDERS that Joseph E. Lehnert is hereby admitted *pro hac vice* to practice before the Court in these proceedings.

Dated: _____

_____
UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Neil E. McCullagh
Robert S. Westermann, Esq. (VSB No. 43294)
Neil E. McCullagh, Esq. (VSB No. 39027)
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Co-Counsel for the Reorganized Debtor

LBR 9022-1 CERTIFICATION

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/ Neil E. McCullagh
Counsel

PARTIES TO RECEIVE COPIES:

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