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

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

PLEASE TAKE NOTICE that on July 12, 2024, Hopeman Brothers, Inc. (the “Debtor”) filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “Court”): (i) the *Plan of Liquidation of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code*, dated June 12, 2024 (Docket No. 56) (including all exhibits thereto and as amended, modified or supplemented from time to time, the “Plan”), and (ii) the *Disclosure Statement with Respect to the Plan of Liquidation of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code*, dated June 12, 2024 (Docket No. 56) (including all exhibits thereto and as amended, modified or supplemented from time to time, the “Disclosure Statement”),

PLEASE TAKE FURTHER NOTICE that on July 16, 2024, the Debtor filed the following (the “Solicitation Motion”) with the Court: *Debtor’s Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement; (II) Approving the Solicitation Procedures in Connection with the Debtor’s Plan of Liquidation; (III) Approving the Forms of Ballots and Notices Related Thereto; (IV) Scheduling a Hearing to Consider Confirmation of the Debtor’s Plan of Liquidation; (V) Establishing Certain Deadlines with Respect Thereto; and (VI) Granting Related Relief.*

PLEASE TAKE FURTHER NOTICE that a hearing on the Disclosure Statement and the Solicitation Motion (the “Disclosure Statement Hearing”) is currently scheduled before the Honorable Keith L. Phillips, United States Bankruptcy Judge, at **10:00 a.m. (prevailing Eastern Time) on September 24, 2024**, in Courtroom 5100 of the United States Bankruptcy Court for the



Eastern District of Virginia, Richmond Division, 701 East Broad Street, 5th Floor, Richmond, Virginia 23219, to consider, among other things, entry of an order (a) approving the adequacy of the Disclosure Statement, (b) establishing certain procedures for soliciting and tabulating votes on the Plan, (c) approving the forms of ballots and manner of notice, (d) fixing important dates and deadlines with respect to voting on, and filing objections to, the Plan, and (e) granting other related relief (the “Order”). Please be advised that the Disclosure Statement Hearing may be continued from time to time by the Court or the Debtor without further notice other than by adjournment being announced in open court or by a notice of adjournment filed with the Court and served on the list of parties entitled to notice.

PLEASE TAKE FURTHER NOTICE that a copy of the Plan, Disclosure Statement and Solicitation Motion may be obtained at no charge at <https://www.veritaglobal.net/hopeman> or for a fee at <https://ecf.vaeb.uscourts.gov>.

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 the deadline for filing objections to the Disclosure Statement and Solicitation Motion is **September 17, 2024** (the “Objection Deadline”). Any objections to the relief sought at the Disclosure Statement hearing must: (a) be made in writing; (b) conform to the applicable provisions of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Local Bankruptcy Rules and the Case Management Procedures; (c) state with particularity the legal and factual basis for the objection and if practicable a proposed modification to the Disclosure Statement (or related materials) that would resolve such objection; and (e) be filed with the Court, together with a proof of service, and served upon the following parties so as to be actually received on or before the Objection Deadline:

- i. The Debtor: (a) Hunton Andrews Kurth LLP, Riverfront Plaza, East Tower, 951 East Byrd Street, Richmond, Virginia 23219, Attn: Tyler P. Brown and Henry P. (Toby) Long, III; and (b) Hunton Andrews Kurth LLP, 600 Travis Street, Suite 4200, Houston, Texas, 77002, Attn: Joseph P. Rovira and Catherine A. Rankin.
- ii. The Office of the United States Trustee: 701 East Broad Street, Suite 4304, Richmond, VA 23219, Attn: Kathryn R. Montgomery.
- iii. The Creditors Committee: counsel for any official committee of unsecured creditors, if then appointed in this case, on or before the Objection Deadline.
- iv. The 2002 List: any party that has requested notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE FURTHER NOTICE that if an objection to the Disclosure Statement and/or the Solicitation Motion is not properly and timely filed and served by the Objection Deadline, the Court may deem any opposition waived, treat the Disclosure Statement and/or the Solicitation Motion as conceded and issue an order granting the requested relief without further notice or hearing.

Dated: July 16, 2024
Richmond, Virginia

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

Tyler P. Brown (VSB No. 28072)

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

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