

GEROLYN P. ROUSSEL (*pro hac vice*
pending)
JONATHAN B. CLEMENT (*pro hac vice*
pending)
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Lead Counsel for Janet Rivet, Kayla Rivet,
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Ragusa Primeaux, Stephanie Jean Ragusa
Connors, Erica Dandry Constanza and
Monica Dandry Hallner

Local Counsel for Janet Rivet, Kayla
Rivet, Maxine Becky Polkey Ragusa,
Valerie Ann Ragusa Primeaux,
Stephanie Jean Ragusa Connors, Erica
Dandry Constanza and Monica Dandry
Hallner

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

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

**MOTION FOR ADMISSION OF GEROLYN P. ROUSSEL TO PRACTICE,
PRO HAC VICE, UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)**

Kollin G. Bender (the "Movant"), hereby moves the Court, pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia, to enter an order, substantially in the form attached hereto as Exhibit A (the "Order"), authorizing Gerolyn P. Roussel (the "Admittee") to appear *pro hac vice* in the above captioned case (the "Bankruptcy Case") and any related proceeding for the purpose of representing Janet Rivet and Kayla Rivet (surviving spouse and child of Tommy Rivet),



Maxine Becky Polkey Ragusa, Valerie Ann Ragusa Primeaux, and Stephanie Jean Ragusa Connors (surviving spouse and children of Frank P. Ragusa, Jr.), and Erica Dandry Constanza and Monica Dandry Hallner (surviving children of Michael Dandry, Jr.) (collectively “Creditors”) in the above-captioned chapter 11 case. In support of this Motion, Movant states:

1. The Movant is a member in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.
2. Ms. Roussel is a member in good standing of the Bar of the State of Louisiana and is admitted to practice before the United States Supreme Court, the United States Court of Appeals, Fifth Circuit, the United States District Courts for the Eastern District, Middle District, and Western District of Louisiana, and the Bankruptcy Court for the Eastern District of Louisiana. There are no disciplinary proceedings pending against her in any jurisdiction in which she is admitted to practice.
3. The Movant requests that this Court authorize the Admittee to appear and be heard at hearings, and to otherwise participate in the Bankruptcy Case and all related proceedings.
4. The Movant and his law firm will serve as counsel to the Creditors with the Admittee and other members of the Movant’s law firm in the Bankruptcy Case and all related proceedings.
5. The Admittee’s Application is appended to this Motion as Exhibit B and incorporated by reference into this Motion.
6. Notice of this Motion will be provided via CM/ECF electronic notification to all

parties registered to receive such notice in the above-captioned case as of the time of service. Movant believes that, in view of the facts and circumstances, such notice is sufficient and no other or further notice need be provided.

WHEREFORE, Movant respectfully requests that this Court enter an Order (a) authorizing the Admittee to appear *pro hac vice* in the Bankruptcy Case and all related proceedings and (b) granting the Movant such other and further relief as is just.

Dated: July 29, 2024

Respectfully submitted,

/s/ Kollin G. Bender

Robert S. Westermann (VSB No. 43294)

Kollin G. Bender (VSB No. 98912)

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and

Gerolyn P. Roussel (pro hac vice forthcoming)

Jonathan B. Clement (pro hac vice forthcoming)

Benjamin P. Dinehart (pro hac vice forthcoming)

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Dandry Hallner

EXHIBIT A

Proposed Order

GEROLYN P. ROUSSEL (*pro hac vice* pending)
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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**
Debtor *
*

**ORDER GRANTING MOTION FOR ADMISSION OF
GEROLYN P. ROUSSEL TO PRACTICE, PRO HAC VICE,
UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)**

Upon the Motion for Admission to Practice, *Pro Hac Vice*, Under Local Bankruptcy Rule 2090-1(E)(3) (the "Motion") of Kollin G. Bender with the law firm of Hirschler, for the admission *pro hac vice* of Gerolyn P. Roussel; the Court finds that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and

1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) adequate notice of the Motion has been given and that no other or further notice is necessary; and (iv) good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion.

IT IS HEREBY ORDERED THAT

1. The Motion is **GRANTED**.
2. Gerolyn P. Roussel is permitted to appear *pro hac vice* as counsel to Janet Rivet and Kayla Rivet, Maxine Becky Polkey Ragusa, Valerie Ann Ragusa Primeaux, and Stephanie Jean Ragusa Connors, and Erica Dandry Constanza and Monica Dandry Hallner in the above-captioned chapter 11 case and any related proceeding in accordance with Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia.
3. The Application attached to the Motion as Exhibit B is approved.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2024

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Kollin G. Bender

Robert S. Westermann (VSB No. 43294)

Kollin G. Bender (VSB No. 98912)

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CERTIFICATION OF ENDORSEMENT
UNDER 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/Kollin G. Bender

EXHIBIT B

Pro Hac Vice Application

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, * Case Name In re: Hopeman Brothers, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) Gerolyn Petit Roussel
Bar Identification Number 01134 State Louisiana
Firm Name Roussel & Clement
Firm Phone # 985-778-2733 Direct Dial # _____ FAX # 985-778-2734
E-Mail Address rcfirm@rousselandclement.com
Office Mailing Address 1550 West Causeway Approach, Mandeville, LA 70471
Name(s) of federal court(s) in which I have been admitted Supreme Court, Fifth Circuit, EDLA, MDLA, WDLA, LAEB

I am a member in good standing of the Bar of the following United States District Court(s): EDLA, MDLA, WDLA

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.


(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*.

Kevin Ba
(Signature)

7/29/24
(Date)

Kollin Bender
(Typed or Printed Name)

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