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Local Counsel for Boling Law Firm

Jeremiah Boling (*pro hac* admission pending)
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Counsel for Boling Law Firm

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

Hopeman Brothers, Inc.,

Debtor.

Chapter 11

Case No. 24-32428-KLP

MOTION FOR ADMISSION *PRO HAC VICE*

Jennifer J. West, Esquire (the “Movant”), a member in good standing of the Virginia State Bar, an attorney duly admitted to practice before the U.S. Bankruptcy Court for the Eastern District of Virginia, and an attorney with the law firm of Spotts Fain PC, moves the Court, pursuant to Local Rule 2090-1(E)(3) of the Local Rules for the U.S. Bankruptcy Court for the Eastern District of Virginia, for the entry of an Order authorizing Jeremiah Boling, Esquire (“Mr. Boling”), an attorney with Bowling Law Firm, to appear and practice *pro hac vice* before this Court as counsel to Boling Law Firm, in the above-captioned bankruptcy proceedings and any related or associated proceedings (the “Motion”). In support of the Motion, Movant states as follows:

1. Mr. Boling is a member of the bar of the State of Louisiana and is admitted to practice before the United States District Court for the Eastern, Middle and Western Districts of



Louisiana, the Northern District of Illinois, the Northern District of California and the Eastern District of New York. There are no disciplinary proceedings pending against Mr. Boling.

2. Local Rule 2090-1(E)(3) provides that “an attorney from another state, the District of Columbia or a territory of the United States may appear and practice in cases *pro hac vice* before this Court upon a motion of a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar. Applicants for *pro hac vice* admission shall complete a written application, which shall be appended to and incorporated by reference in the aforesaid motion.” **Exhibit B**, attached hereto, is a completed Application required by Local Rule 2090-1(E)(3)(a).

3. Movant requests that the Court authorize Mr. Boling to appear at hearings in the above-captioned bankruptcy cases and related adversary proceedings and practice before this Court in those proceedings.

4. Movant has provided notice of this Motion to all persons that receive CM/ECF notice in these bankruptcy cases, including the Office of the U.S. Trustee and counsel for the Debtors.

WHEREFORE, Movant requests that the Court enter an order, substantially in the form of **Exhibit A**, attached hereto, authorizing Jeremiah Boling, Esquire to appear and practice *pro hac vice* as Counsel to Boling Law Firm and granting such other relief that the Court deems proper.

Dated: August 1, 2024

BOLING LAW FIRM

/s/ Jennifer J. West

Robert H. Chappell, III, Esq. (VSB #31698)

Jennifer J. West, Esq. (VSB #47522)

Christopher A. Hurley, Esq. (VSB #93575)

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Local Counsel for Boling Law Firm

and

Jeremiah Boling (*pro hac* admission pending)

Boling Law Firm

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New Orleans, Louisiana 70130

Telephone: (504) 569-5904

Facsimile: (504) 569-5774

Email: jboling@bolingfirm.com

Counsel for Boling Law Firm

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served via CM/ECF on this 1st day of August 2024 on the Office of the United States Trustee, Counsel for the Debtors, and all parties receiving notice in the above-captioned case, constituting all necessary parties.

/s/ Jennifer J. West

EXHIBIT A – PROPOSED ORDER

Robert H. Chappell, III, Esq. (VSB #31698)
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

Hopeman Brothers, Inc.,

Debtor.

Chapter 11

Case No. 24-32428-KLP

ORDER GRANTING MOTION FOR ADMISSION *PRO HAC VICE*

On the motion (the “Motion”¹) of Jennifer J. West, Esquire of Spotts Fain PC seeking authorization of the admission *pro hac vice* for Jeremiah Boling, Esquire, an attorney with Boling Law Firm; and it appearing that the relief requested in the Motion is proper and appropriate; the Court having jurisdiction to consider the Motion and that the relief requested therein is a core proceeding within the meaning of 28 U.S.C. §§ 157 and 1334; venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that

1. The Motion is granted in its entirety.
2. Jeremiah Boling, Esquire is authorized to appear before the Court and practice *pro hac vice* as Counsel to Boling Law Firm in the above-captioned bankruptcy cases and related

¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

or associated proceedings.

3. The terms and conditions of this Order shall be effective immediately upon entry on the Court's docket, and any applicable stay that would otherwise delay the effectiveness of this Order is WAIVED.

4. The Court shall retain jurisdiction concerning all matters arising from or related to the implementation of this Order.

DATED:

United States Bankruptcy Judge

ENTERED ON DOCKET:

I Ask For This:

/s/

Robert H. Chappell, III, Esq. (VSB #31698)
Jennifer J. West, Esq. (VSB #47522)
Christopher A. Hurley, Esq. (VSB #93575)
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Local Counsel for Boling Law Firm

and

Jeremiah Boling (*pro hac* admission pending)
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Telephone: (504) 569-5904
Facsimile: (504) 569-5774
Email: jboling@bolingfirm.com
Counsel for Boling Law Firm

CERTIFICATION

The undersigned hereby certifies that the foregoing Order has been endorsed by or served on all necessary parties as required by Local Rule 9022-1(C)(1).

Date: _____, 2024 /s/

PARTIES TO RECEIVE COPIES:

Jennifer J. West, Esquire
Spotts Fain PC
411 East Franklin Street, Suite 600
Richmond, VA 23219

Jeremiah Boling, Esquire
Boling Law Firm
541 Julia Street, Suite 300
New Orleans, LA 70130

EXHIBIT B - LOCAL RULE 2090-1(E)(3) 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-KLP, * Case Name Hopeman Brothers, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) JEREMIAH BOLING
Bar Identification Number 34249 State LOUISIANA
Firm Name BOLING LAW FIRM
Firm Phone # 504-569-5904 Direct Dial # 504-569-5819 FAX # 504-569-5774
E-Mail Address jboling@bolingfirm.com

Office Mailing Address 541 Julia Street, Suite 300, New Orleans, LA 70130

Name(s) of federal court(s) in which I have been admitted LA Eastern District, LA Western District, LA Middle District, IL Northern District, CA Northern District, NY Eastern District

I am a member in good standing of the Bar of the following United States District Court(s): LA Eastern District, LA Western District, LA Middle District

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.

JB
(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/ Jennifer J. West
(Signature)

August 1, 2024
(Date)

Jennifer J. West
(Typed or Printed Name)

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