

**CAPLIN & DRYSDALE, CHARTERED**

Kevin C. Maclay (*pro hac vice* pending)  
Todd E. Phillips (*pro hac vice* pending)  
Jeffrey A. Liesemer (VSB No. 35918)  
Nathaniel R. Miller (*pro hac vice* pending)  
1200 New Hampshire Avenue NW, 8<sup>th</sup> Floor  
Washington, DC 20036  
Telephone: (202) 862-5000

*Proposed Counsel for the Official  
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**MOTION FOR ADMISSION OF BRADY EDWARDS TO PRACTICE,  
PRO HAC VICE, UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)**

Jeffrey A. Liesemer (“**Movant**”) hereby moves (by this “**Motion**”) this Court, in accordance with Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia, for entry of an order, substantially in the form of order attached hereto as Exhibit A (“**Order**”), authorizing Brady Edwards, a partner of the law firm of Morgan, Lewis & Bockius, LLP, (“**Morgan Lewis**”), 1000 Louisiana Street, Suite 4000, Houston, TX 77002-5005, to appear *pro hac vice* to represent the Official Committee of Unsecured Creditors (“**Committee**”) in the above-captioned case (“**Bankruptcy Case**”) and any related proceedings. In support of this Motion, Movant states as follows:



1. This Court has subject matter jurisdiction to consider this matter under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409.

2. 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.

3. Brady Edwards is a member in good standing of the bars of Texas, Oklahoma, Wyoming, Illinois, New York, Pennsylvania, the District of Columbia, Missouri, and Arkansas and is admitted to practice before the United States District Courts for the Eastern, Western, Southern, and Northern Districts of Texas, the United States Court of Appeals for the Fifth Circuit, and the United States Supreme Court. There are no disciplinary proceedings pending against him in any jurisdiction.

4. Movant requests that this Court authorize Mr. Edwards to appear and be heard at hearings and otherwise to participate in the Bankruptcy Case and all related proceedings on behalf of the Committee.

5. The Committee has selected Mr. Edwards and other attorneys of Morgan Lewis to serve as the Committee's special insurance counsel.

6. Mr. Edwards's application is appended to this Motion as Exhibit B and incorporated by reference as if fully set forth herein.

7. Notice of this Motion will be provided via CM/ECF electronic notification to all parties registered to receive such notice in the Bankruptcy Case as of the time of service. Given the nature of the relief requested, Movant submits that no further notice is necessary.

For the reasons explained above, Movant requests that this Court enter an Order (a) authorizing Mr. Edwards to appear *pro hac vice* in the Bankruptcy Case and all related proceedings on behalf of the Committee and (b) granting the Movant such other and further relief as the Court may deem proper.

Dated: August 30, 2024

Respectfully submitted,

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (*pro hac vice* pending)

Todd E. Phillips (*pro hac vice* pending)

Jeffrey A. Liesemer (VSB No. 35918)

Nathaniel R. Miller (*pro hac vice* pending)

CAPLIN & DRYSDALE, CHARTERED

1200 New Hampshire Avenue NW, 8<sup>th</sup> Floor

Washington, DC 20036

Telephone: (202) 862-5000

kmaclay@capdale.com

tphillips@capdale.com

jliesemer@capdale.com

nmiller@capdale.com

*Proposed Counsel for the Official  
Committee of Unsecured Creditors*

**EXHIBIT A**

**Proposed Order**

**CAPLIN & DRYSDALE, CHARTERED**

Kevin C. Maclay (*pro hac vice* pending)  
Todd E. Phillips (*pro hac vice* pending)  
Jeffrey A. Liesemer (VSB No. 35918)  
Nathaniel R. Miller (*pro hac vice* pending)  
1200 New Hampshire Avenue NW, 8<sup>th</sup> Floor  
Washington, DC 20036  
Telephone: (202) 862-5000

*Proposed Counsel for the Official  
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

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

Upon the *Motion for Admission of Brady Edwards to Practice, Pro Hac Vice, Under Local Bankruptcy Rule 2090-1(E)(3)* (“**Motion**”), filed by Jeffrey A. Liesemer of the law firm of Caplin & Drysdale, Chartered, and the Court having determined that (i) it has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding under 28 U.S.C. § 157(b), (iii) adequate notice of the Motion was given and no other or further notice is necessary, and (iv) the legal and factual bases set forth in the Motion establish good cause for the relief to be granted herein, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The application attached to the Motion as Exhibit B is APPROVED.

3. Brady Edwards is permitted to appear and practice before this Court *pro hac vice* as special insurance counsel to the Official Committee of Unsecured Creditors in the above-captioned chapter 11 case and any related proceedings in accordance with Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia.

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 this Order.

Dated: \_\_\_\_\_, 2024  
Richmond, Virginia

---

THE HONORABLE KEITH L. PHILLIPS  
UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (*pro hac vice* pending)  
Todd E. Phillips (*pro hac vice* pending)  
Jeffrey A. Liesemer (VSB No. 35918)  
Nathaniel R. Miller (*pro hac vice* pending)  
1200 New Hampshire Avenue NW, 8<sup>th</sup> Floor  
Washington, DC 20036  
Telephone: (202) 862-5000  
kmaclay@capdale.com  
tphillips@capdale.com  
jliesemer@capdale.com  
nmiller@capdale.com

*Proposed Counsel for the Official  
Committee of Unsecured Creditors*

**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/ Jeffrey A. Liesemer

**EXHIBIT B**

**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 In re Hopeman Brothers, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) Brady Edwards  
Bar Identification Number 00793021 State Texas  
Firm Name Morgan, Lewis & Bockius LLP  
Firm Phone # 713.890.5000 Direct Dial # 713.890.5110 FAX # 713.890.5001  
E-Mail Address brady.edwards@morganlewis.com  
Office **Mailing** Address 1000 Louisiana Street, Suite 4000, Houston, TX 77002-5005  
Name(s) of federal court(s) in which I have been admitted See Attachment A

I am a member in good standing of the Bar of the following United States District Court(s): See Attachment A

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/ Brady Edwards  
(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/ Jeffrey A. Liesemer  
(Signature)

8/30/2024  
(Date)

Jeffrey A. Liesemer  
(Typed or Printed Name)

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

**ATTACHMENT A**

Applicant, Brady S. Edwards, has been admitted to practice before the following courts:

Court:	Date Admitted:
Texas	5/5/1995
Pennsylvania	1/22/2008
District of Columbia	11/7/2008
Missouri	6/26/2008
Arkansas	10/23/2007
New York	12/7/2011
Illinois	2/4/2016
Wyoming	6/1/2017
Oklahoma	6/29/2020
US District Court for the Eastern District of Texas	12/20/1995
US District Court for the Northern District of Texas	01/18/1996
US District Court for the Southern District of Texas	12/28/1995
US District Court for the Western District of Texas	03/04/1997
US Supreme Court	04/19/2004
US Court of Appeals for the Fifth Circuit	02/25/2003