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Proposed Counsel for Debtor and Debtor-in-Possession

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

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

CERTIFICATE OF NO OBJECTION

The undersigned hereby certifies that, as of the date hereof, he is not aware of any answer, objection or other responsive pleading to the *Application of the Debtor for Entry of an Order (I) Authorizing the Appointment of Blank Rome LLP as Special Insurance Counsel Effective as of the Petition Date and (II) Granting Related Relief* [Docket No. 71] (the “Blank Rome Application”), which was filed by the above-captioned debtor (the “Debtor”) on July 22, 2024.

The undersigned further certifies that the Debtor served the Blank Rome Application on all necessary parties on July 22, 2024, in accordance with the “Procedures for Complex Chapter 11 Cases in the Eastern District of Virginia” (the “Case Management Procedures”), as adopted by Rule 1075-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Virginia. Pursuant to the Case Management Procedures and the notice served with the Blank Rome Application, all objections to the approval of the relief requested in the Blank Rome



Retention Application were due on or before August 3, 2024. The Debtor subsequently agreed to extend the objection deadline to the Hunton Retention Application for certain parties to August 30, 2024.

The undersigned further certifies that the notice filed with the Blank Rome Retention Application includes a statement that the Blank Rome Retention Application may be granted and an order entered without a hearing unless a timely objection is made. The undersigned further certifies that he has caused a review of the Court's docket in this case and no answer, objection or other responsive pleading to the Blank Rome Retention Application appears thereon, nor is he aware of any informal answer or objection to the Blank Rome Retention Application.

Therefore, pursuant to the notice filed with the Blank Rome Retention Application and the Case Management Procedures, the Debtor is authorized, and intends, to submit the Order approving the Blank Rome Retention Application to the Court for entry, without further notice or hearing. The United States Trustee has authorized the Debtor to add her endorsement to the Order approving the Blank Rome Retention Application.

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Dated: September 6, 2024
Richmond, Virginia

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

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