

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

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

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

**COMES NOW**, Douglas M. Foley (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 Jonathan David Marshall (the “Admittee”) to appear *pro hac vice* in the above captioned case (the “Bankruptcy Case”) and any related proceeding for the purpose of representing Liberty Mutual Insurance Company (“Liberty”). 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. Mr. Marshall is a member in good standing of the Bar of the State of Massachusetts and is admitted to practice before the United States District Court of

Douglas M. Foley (VSB No. 34364)  
Kaufman & Canoles, P.C.  
Two James Center  
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Facsimile: (888) 360-9092  
Email: dmfoley@kaufcan.com

Counsel for Liberty Mutual Insurance Company



Massachusetts and Southern District of New York. There are no disciplinary proceedings pending against him in any jurisdiction in which he 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 Liberty with the Admittee 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. Liberty believes that, in view of the facts and circumstances, such notice is sufficient and no other or further notice need be provided.

Dated: September 10, 2024

**KAUFMAN & CANOLES, P.C.**

By: /s/ Douglas M. Foley  
Counsel

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*Counsel to Liberty Mutual Insurance Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 10, 2024, a true copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send a notification of electronic filing (NEF) to all creditors and parties in interest.

/s/ Douglas M. Foley

# Exhibit A

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

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<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>HOPEMAN BROTHERS, INC.,</b>	)	<b>Case No. 24-32428 KLP</b>
	)	
<b>Debtor</b>	)	
	)	

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**ORDER GRANTING MOTION FOR ADMISSION OF  
JONATHAN DAVID MARSHALL 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 Douglas M. Foley with the law firm of Kaufman & Canoles, P.C., for the admission *pro hac vice* of Jonathan David Marshall with the law firm of Choate, Hall & Stewart LLP; 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. Jonathan David Marshall is permitted to appear *pro hac vice* as counsel to Liberty 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: This \_\_\_\_ day of \_\_\_\_\_, 2024.  
Richmond, Virginia

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**Bankruptcy Judge Keith L. Phillips**

**WE ASK FOR THIS:**

Douglas M. Foley (VSB No. 34364)  
Kaufman & Canoles, P.C.  
Two James Center  
1021 E. Cary Street, Suite 1400  
Richmond, Virginia 23219  
Telephone: (804) 771-5746  
Facsimile: (888) 360-9092  
Email: dmfoley@kaufcan.com

*Counsel to Liberty Mutual Insurance Company*

**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/ Douglas M. Foley

# Exhibit B

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

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

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY  
UNDER LOCAL BANKRUPTCY RULE 2090—1(E)(3)

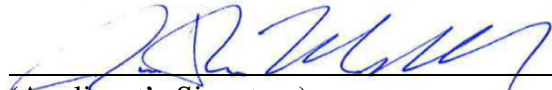
FULL NAME (no initials, please) Jonathan David Marshall  
Bar Identification Number: 680723  
Firm Name: Choate, Hall & Stewart LLP  
Firm Phone No. (617) 248-5000 Direct Dial No. (617) 248-4799 Facsimile No. (617) 502-4799  
E-mail Address: jmarshall@choate.com  
Office Mailing Address Two International Place, Boston, MA 02110  
Name(s) of federal court(s) in which I have been admitted: State of New York January, 2011,  
Commonwealth of Massachusetts June, 2011, Southern District of New York September, 2011,  
District of Massachusetts October, 2011

I am a member in good standing of the Bar of the following United States District Court(s): \_\_\_\_\_  
District of Massachusetts, Southern District of New York

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.

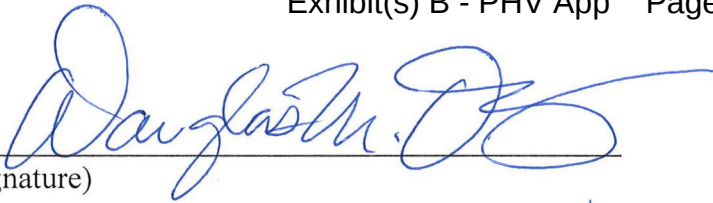
I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

  
\_\_\_\_\_  
(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 application *pro hac vice*.

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



  
\_\_\_\_\_  
(Signature)

Sept 9, 2024  
(Date)

DOUGLASM. FOLEY  
(Typed or Printed Name)