

TROUTMAN PEPPER LOCKE LLP

Dabney J. Carr (VSB No. 28679)
1001 Haxall Pt.
Richmond, VA 23219
Telephone: (804) 697-1200

Leslie A. Davis (admitted *pro hac vice*)
401 9th Street, NW
Washington, DC 20004
Telephone: (202) 274-2950

*Counsel for Century Indemnity Company,
Westchester Fire Insurance Company,
Continental Casualty Company,
and General Reinsurance Corporation*

WHITE & WILLIAMS LLP

Patricia B. Santelle (admitted *pro hac vice*)
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103
Telephone: (215) 864-7000

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

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

MOTION FOR ADMISSION OF MICHAEL T. CAROLAN TO PRACTICE *PRO HAC VICE* UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)

Dabney J. Carr (the “Movant”), hereby moves (this “Motion”) 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 Michael T. Carolan (“the Admittee”) to appear *pro hac vice* in the above captioned case (the “Bankruptcy Case”) and any related proceeding for the purpose of representing Century Indemnity Company, Westchester Fire Insurance Company, Continental Casualty Company, and



General Reinsurance Corporation 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. Mr. Carolan is a member in good standing of the bar of the State of Michigan and the District of Columbia. He is admitted to practice before the United States Court of Appeals for the District of Columbia Circuit. There are no disciplinary proceedings pending against Mr. Carolan.

3. Pursuant to Local Rule 2090-1(E)(2), “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 motion of a member of the Bar of this Court, provided that in all appearance 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.”

4. Movant requests the Court authorize the Admittee to appear and be heard at hearings, and to otherwise participate in the Bankruptcy Case and all related proceedings.

5. The Movant and his law firm will serve as counsel to Century Indemnity Company, Westchester Fire Insurance Company, Continental Casualty Company, and General Reinsurance Corporation in the Bankruptcy Case and all related proceedings.

6. The Admittee’s applications for admission *pro hac vice* is appended to this Motion as Exhibit B and incorporated by referenced into this Motion.

7. 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.

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: April 21, 2025

Respectfully submitted,

/s/ Dabney J. Carr
Dabney J. Carr (VSB No. 28679)
TROUTMAN PEPPER HAMILTON
SANDERS LLP
1001 Haxall Pt.
Richmond, VA 23219
Telephone: (804) 697-1200
dabney.carr@troutman.com

*Counsel for Century Indemnity
Company, Westchester Fire
Insurance Company, Continental
Casualty Company, and General
Reinsurance Corporation*

Exhibit A

Proposed Order

TROUTMAN PEPPER LOCKE LLP

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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 (KLP)
	:	
Debtor.	:	
	:	
	:	

ORDER GRANTING MOTION FOR ADMISSION OF MICHAEL T. CAROLAN 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 2090-1E(3)* (the “Motion”) of Dabney J. Carr, IV with the law firm of Troutman Pepper Locke LLP, for the admission *pro hac vice* of Michael T. Carolan, 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. Michael T. Carolan is permitted to appear *pro hac vice* as counsel to Century Indemnity Company, Westchester Fire Insurance Company, Continental Casualty Company, and General Reinsurance Corporation 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: _____, 2025
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Dabney J. Carr, IV
Dabney J. Carr (VSB No. 28679)
TROUTMAN PEPPER LOCKE LLP
1001 Haxall Pt.
Richmond, VA 23219
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*Counsel for Century Indemnity Company,
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General Reinsurance Corporation*

**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/ Dabney J. Carr, IV

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

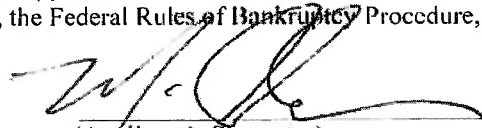
FULL NAME (no initials, please) Michael Thomas Carolan
Bar Identification Number 980868 State DC
Firm Name Troutman Pepper Locke LLP
Firm Phone # (202) 274-2950 Direct Dial # (202) 486-4598 FAX # 248.359.7700
E-Mail Address michael.carolan@troutman.com
Office Mailing Address 401 9th Street NW, Washington, DC 20004
Name(s) of federal court(s) in which I have been admitted U.S. Court of Appeals for the D.C. Circuit

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

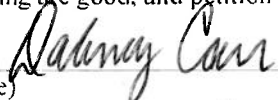
I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

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*.


(Signature)

4-21-2025
(Date)

DABNEY CARR
(Typed or Printed Name)

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