#### TROUTMAN PEPPER LOCKE LLP

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# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

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

### NOTICE OF MOTION AND NOTICE OF HEARING

PLEASE TAKE NOTICE that on July 7, 2025, Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America ("Century"), and Westchester Fire Insurance Company (on its own behalf and for policies issued by or novated to Westchester Fire Insurance Company) ("Westchester Fire") (together, the "Chubb Insurers") filed the following motion with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond District (the "Court"): Chubb Insurers' Motion for Entry of an Order Authorizing Chubb Insurers to File Unredacted Versions of Its Objection to (1) Final Approval of Disclosure Statement; and (2) Confirmation of Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code Under Seal (the "Motion"), Dkt. No. . .

PLEASE TAKE FURTHER NOTICE that copies of the Motion may be obtained at no charge at https://www.veritaglobal.net/hopement or for a fee at https://ecf.vaeb.uscourts.gov.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motions carefully and discuss them with your attorney, if you have one in the Chapter 11 case. If you do not have an attorney, you may wish to consult one.



**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your view on the Motion, then by July 11, 2025 (the "Response Deadline") you or your attorney must:

X File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will receive it on or before the Response Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and issue an order granting the requested relief without further notice or hearing.

Clerk of the Court United States Bankruptcy Court 701 East Broad Street, Suite 4000 Richmond, Virginia 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written response on Chubb Insurers so that the response is received on or before the Response Deadline.

X Attend the hearing before the Honorable Keith L. Phillips, United States Bankruptcy Judge, <u>at 10:00 a.m. (prevailing Eastern Time) on July 14, 2025</u>, in Courtroom 5100 of the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, 5th Floor, Richmond, Virginia 23219.

**PLEASE TAKE FURTHER NOTICE** that you should consult the Case Management Procedures before filing any written response to the Motion.

Dated: July 7, 2025 By: /s/ Dabney J. Carr

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Counsel for Century Indemnity Company and Westchester Fire Insurance Company

### **CERTIFICATE OF SERVICE**

I hereby certify that, on the date indicated below, I caused the foregoing to be electronically filed via the Court's Case Management/Electronic Case Filing System and thereby served upon all counsel or parties of record, and served on the following via electronic mail and U.S. Mail:

#### **Counsel for Hopeman Brothers, Inc.**

Hunton Andrews Kurth LLP Joseph P. Rovira Catherine A. Rankin 600 Travis Street, Suite 4200 Houston, TX 77002

and

Tyler P. Brown Henry P. (Toby) Long III Riverfront Plaza, East Tower 951 East Byrd Street Richmond, VA 23219

# **US Trustee for the Eastern District of Virginia**

Attn: Kathryn R. Montgomery 701 East Broad Street, Suite 4304 Richmond, VA 23219

### **Counsel for the Official Committee of Unsecured Creditors**

Caplin & Drysdale, Chartered Kevin C. Maclay Todd E. Phillips Jeffrey A. Liesemer Kevin M. Davis Nathaniel R. Miller 1200 New Hampshire Avenue NW, 8th Floor Washington, DC 20036

### **Counsel for Future Claimants' Representative**

Campbell & Levine, LLC David B. Salzman Kathryn L. Harrison 310 Grant Street, Suite 1700 Pittsburgh, PA 15219

Dated: July 7, 2025 /s/ Dabney J. Carr

Dabney J. Carr