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Local Counsel for Rebecca Kirkland, on behalf of the Estate of Jerry Kirkland, Gerlando Castelli, George Zensen, Jr., Sharon Teffeteller, on behalf of the Estate of Jerry Teffeteller, Sidney Cheek, Diane Farris, on behalf of the Estate of John Gallo (SGP Clients)

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor

Case No. 24-32428-KLP

Chapter 11

**MOTION PURSUANT TO LOCAL RULE 2090-1(E)(3)
FOR ADMISSION *PRO HAC VICE* OF TIFFANY DICKENSON**

Lynn L. Tavenner (“**Movant**”), a member in good standing of the Bar of the Commonwealth of Virginia, an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and a partner with Tavenner & Beran, PLC, hereby moves the Court, pursuant to this motion (the “**Motion**”), for entry of an order, substantially in the form of **Exhibit A**, authorizing Tiffany Dickenson, (“**Ms. Dickenson**”), to appear and practice *pro hac vice* as counsel to *Rebecca Kirkland, on behalf of the Estate of Jerry Kirkland, Gerlando Castelli, George Zensen, Jr., Sharon Teffeteller, on behalf of the Estate of Jerry Teffeteller, Sidney Cheek, Diane Farris, on behalf of the Estate of John Gallo* (collectively, the “**SGP Clients**”), in the above-captioned chapter 11 case now pending in the United States Bankruptcy Court for the



Eastern District of Virginia pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “**Local Rules**”). In support of this Motion, Movant states as follows:

1. Ms. Dickenson is an attorney in the Dallas, Texas office of the firm Simon Greenstone Panatier, PC.

2. Ms. Dickenson is a member of the Texas bar (Bar No. 24010264), Mississippi bar (Bar No. 100617), Pennsylvania bar (Bar No. 312636), Louisiana bar (Bar No. 34515), and California bar (Bar No. 264364). Ms. Dickenson is admitted to the Fifth Circuit Court of Appeals (although inactive), and the following federal and district courts: the United States District Central District of California, United States District Court Northern District of California, United States District Court Southern District California, United States District Court Northern District of Mississippi, United States District Court Southern District of Mississippi, United States District Court Northern District of Texas, and United States District Court Western District of Texas. Ms. Dickenson is in good standing to practice before all courts to which she is admitted, and there are no disciplinary actions pending against her in any jurisdiction.

3. Pursuant to Local Rule 2090-1(E)(3), “[a]n attorney, qualified to practice in the United States District Court of 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. Applications for *pro hac vice* admission shall complete a written application, which shall be appended to and incorporated by reference in aforesaid motion.”

4. Movant requests the Court to allow Ms. Dickenson to appear at hearings in this chapter 11 case and related adversary proceedings.

5. Movant has provided notice of this Motion to all persons receiving electronic notice in this bankruptcy case.

6. An Application pursuant to Local Rule 2090(E)(3)(a) is attached hereto as **Exhibit B.**

WHEREFORE, the Movant respectfully requests that the Court enter the Order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: August 12, 2025

Respectfully submitted,

/s/ Lynn L. Tavenner

Lynn L. Tavenner
TAVENNER & BERAN, PLC
20 North Eighth Street, Second Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Email: ltavennern@tb-lawfirm.com

Local Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of August 2025, a true and correct copy of the foregoing was sent electronically to the Office of the United States Trustee, Counsel for the Debtors, and to any party receiving ECF Notices in these cases.

/s/ Lynn L. Tavenner

Lynn L. Tavenner, Esq. (Va. 30083)
Paula S. Beran, Esq. (Va. 34679)
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20 North Eighth Street, Second
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Local Counsel

Exhibit A

Proposed Order

TAVENNER & BERAN, PLC
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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

HOPEMAN BROTHERS, INC.,

Debtor

Case No. 24-32428-KLP

Chapter 11

**ORDER GRANTING MOTION PURSUANT TO LOCAL RULE 2090-1(E)(3)
FOR ADMISSION *PRO HAC VICE* OF TIFFANY DICKENSON**

Upon the Motion of Lynn L. Tavenner for the admission *pro hac vice* of Tiffany Dickenson, an attorney in the Dallas, Texas office of the firm Simon Greenstone Panatier, PC (the “**Motion**”); the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409 and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED:

1. The Motion is granted in its entirety.

2. Tiffany Dickenson is authorized to appear *pro hac vice* before this Court as counsel to *Rebecca Kirkland, on behalf of the Estate of Jerry Kirkland, Gerlando Castelli, George Zensen, Jr., Sharon Teffeteller, on behalf of the Estate of Jerry Teffeteller, Sidney Cheek, Diane Farris, on behalf of the Estate of John Gallo* (collectively, the “SGP Clients”), for the above-captioned chapter 11 case and related adversary proceedings.

3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____
Richmond, Virginia

Honorable Keith L. Phillips
United States Bankruptcy Judge

I ask for this:

/s/ _____
Lynn L. Tavenner, Esq. (Va. 30083)
Paula S. Beran, Esq. (Va. 34679)
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**CERTIFICATION OF ENDORSEMENT PURSUANT TO
LOCAL BANKRUPTCY RULE 9022-1(C)**

Pursuant to 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/ _____

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; 25-03020-KLP , * Case Name In re: Hopeman Brothers, Inc.; Liberty Mutual Insurance Company vs. Hopeman Brothers, Inc. et al

PERSONAL STATEMENT

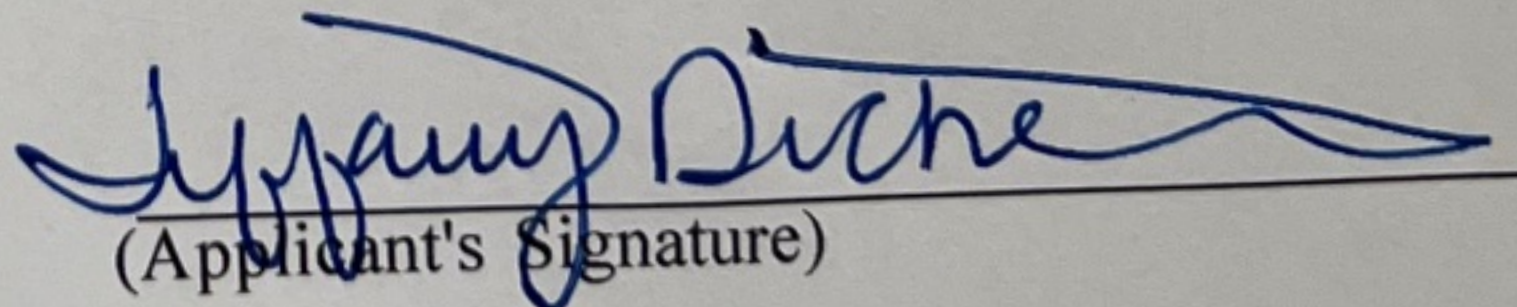
FULL NAME (no initials, please) Tiffany Dickenson
Bar Identification Number 24010264 State Texas
Bar Identification Number 100617 State Mississippi
Bar Identification Number 312636 State Pennsylvania
Bar Identification Number 34515 State Louisiana
Bar Identification Number 264364 State California
Firm Name Simon Greenstone Panatier, PC
Firm Phone# 214-276-7680 Direct Dial# 214-906-8147 FAX# 214-276-7699
E-Mail Address tiffany.dickenson@sgptrial.com
Office Mailing Address 901 Main Street, Suite 5900, Dallas, TX 75202
Name(s) of federal court(s) in which I have been admitted: Fifth Circuit Court of Appeals (Inactive), California Central District Court, California Northern District Court, California Southern District Court, Mississippi Northern District Court, Mississippi Southern District Court, Texas Northern District Court, and Texas Western District Court.

I am a member in good standing of the Bar of the following United States District Court(s): California Central, California Northern, California Southern, Mississippi Northern, Mississippi Southern, Texas Northern, and Texas Western.

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*.

/s/ Lynn L. Tavenner
(Signature)

08/11/2025
(Date)

Lynn L. Tavenner
(Typed or Printed Name)

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