HUNTON ANDREWS KURTH LLP

Joseph P. Rovira (admitted *pro hac vice*) Catherine A. Rankin (admitted *pro hac vice*) 600 Travis Street, Suite 4200 Houston, Texas 77002 Telephone: (713) 220-4200

Counsel for Debtor and Debtor in Possession

HUNTON ANDREWS KURTH LLP

Tyler P. Brown (VSB No. 28072) Henry P. (Toby) Long, III (VSB No. 75134) Riverfront Plaza, East Tower 951 East Byrd Street Richmond, Virginia 23219 Telephone: (804) 788-8200

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re: Chapter 11

HOPEMAN BROTHERS, INC., Case No. 24-32428 (KLP)

Debtor.

CERTIFICATION OF NO OBJECTION AND NOTICE OF FILING OF REVISED PROPOSED ORDER

On July 15, 2025, the above-captioned debtor and debtor in possession (the "Debtor") filed the Fourth Interim Application of Hunton Andrews Kurth LLP, Counsel for the Debtor and Debtor in Possession for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from March 1, 2025 Through and Including May 31, 2025 [Docket No. 996] (the "Hunton Fee Application"). A proposed form of order is annexed to the Hunton Fee Application (the "Original Proposed Order").

The undersigned certifies that the Debtor served the Hunton Fee Application on all necessary parties on July 15, 2025, in accordance with the Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief [Docket No. 162] ("Interim Compensation Procedures") and "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 Interim Compensation Procedures and the notice served with the Hunton Fee Application, all objections to the approval of the relief requested in the Hunton Fee Application were due on or before August 14, 2025.

In response to informal comments received to the Hunton Fee Application, the Debtor has made certain revisions to the Original Proposed Order and hereby is filing a revised proposed Order Granting Fourth Interim Application of Hunton Andrews Kurth LLP, Counsel for the Debtor and Debtor in Possession for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from March 1, 2025 Through and Including May 31, 2025 (the "Revised Proposed Order"), which is attached hereto as Exhibit A. Attached hereto as Exhibit B is a redline of the Revised Proposed Order as compared to the Original Proposed Order.

The undersigned further certifies that the notice filed with the Hunton Fee Application includes a statement that the Hunton Fee 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 Hunton Fee Application appears thereon.

Therefore, pursuant to the notice filed with the Hunton Fee Application and the Interim Compensation Procedures, the Debtor is authorized, and intends, to submit the Revised Proposed Order, without further notice or hearing. The United States Trustee has reviewed and authorized the Debtor to add his endorsement to the Revised Proposed Order.

Dated: August 15, 2025 Richmond, Virginia

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

Tyler P. Brown (VSB No. 28072)

Henry P. (Toby) Long, III (VSB No. 75134)

HUNTON ANDREWS KURTH LLP

Riverfront Plaza, East Tower

951 East Byrd Street

Richmond, Virginia 23219

Telephone: (804) 788-8200 Facsimile: (804) 788-8218

Email: tpbrown@HuntonAK.com

hlong@HuntonAK.com

- and -

Joseph P. Rovira (admitted *pro hac vice*) Catherine A. Rankin (admitted *pro hac vice*)

HUNTON ANDREWS KURTH LLP

600 Travis Street, Suite 4200

Houston, TX 77002

Telephone: (713) 220-4200

Facsimile: (713) 220-4285

Email: josephrovira@HuntonAK.com crankin@HuntonAK.com

Counsel for the Debtor and Debtor in Possession

Exhibit A

Revised Proposed Order

HUNTON ANDREWS KURTH LLP

Joseph P. Rovira (admitted *pro hac vice*) Catherine A. Rankin (admitted *pro hac vice*) 600 Travis Street, Suite 4200 Houston, Texas 77002 Telephone: (713) 220-4200

HUNTON ANDREWS KURTH LLP

Tyler P. Brown (VSB No. 28072) Henry P. (Toby) Long, III (VSB No. 75134) Riverfront Plaza, East Tower 951 East Byrd Street Richmond, Virginia 23219 Telephone: (804) 788-8200

Counsel for Debtor and Debtor in Possession

Debtor.

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re: Chapter 11

HOPEMAN BROTHERS, INC., Case No. 24-32428 (KLP)

ORDER GRANTING FOURTH INTERIM APPLICATION OF HUNTON ANDREWS KURTH LLP, COUNSEL FOR THE DEBTOR AND DEBTOR IN POSSESSION, FOR ALLOWANCE OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM MARCH 1, 2025 THROUGH AND INCLUDING MAY 31, 2025

Upon consideration of the Fourth Interim Fee Application (the "Application") of Hunton Andrews Kurth LLP ("Hunton"), counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the "Debtor"), for the period from March 1, 2025, through and including May 31, 2025 (the "Fourth Interim Application Period"); and Hunton having agreed to voluntarily reduce the compensation sought in the Application by \$795.00 at the request of the United States Trustee, reducing the compensation sought in the Application from \$1,139,958.50 to \$1,139,163.50; and the Court having reviewed the Application and the Monthly Statements that were served by

Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

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Hunton during the Fourth Interim Application Period, and finding that the Court has jurisdiction

over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining that proper and adequate

notice has been given and that no other or further notice is necessary; and after due deliberation

thereon; and good and sufficient cause appearing therefore,

IT IS HEREBY ORDERED that:

1. The Application is GRANTED.

2. Hunton is allowed interim compensation in the amount of \$1,139,163.50 and

reimbursement of expenses in the amount of \$11,532.54 for the Fourth Interim Application Period

as requested in the Application.

3. The Debtor is authorized and directed to disburse to Hunton payment in the amount

of the difference between the allowed amounts and the actual monthly payments previously

received by Hunton for fees and expenses incurred during the Fourth Interim Application Period.

4. The Debtor is authorized and empowered to take such actions as may be necessary

and appropriate to implement the terms of this Order.

5. This Court shall retain jurisdiction with respect to all matters relating to the

interpretation or implementation of this Order.

6. This Order shall be effective immediately upon entry.

Dated:	, 2023	

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

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

Tyler P. Brown (VSB No. 28072)

Henry P. (Toby) Long, III (VSB No. 75134)

HUNTON ANDREWS KURTH LLP

Riverfront Plaza, East Tower

951 East Byrd Street

Richmond, Virginia 23219

Telephone: (804) 788-8200 Facsimile: (804) 788-8218

Email: tpbrown@HuntonAK.com

hlong@HuntonAK.com

- and -

Joseph P. Rovira (admitted *pro hac vice*)

Catherine A. Rankin (admitted pro hac vice)

HUNTON ANDREWS KURTH LLP

600 Travis Street, Suite 4200

Houston, TX 77002

Telephone: (713) 220-4200 Facsimile: (713) 220-4285

Email: josephrovira@HuntonAK.com

crankin@HuntonAK.com

Counsel for the Debtor and Debtor in Possession

SEEN AND NO OBJECTION:

/s/ B. Webb King

B. Webb King (VSB No. 47044)

Trial Attorney

Office of The United States Trustee

210 First Street, Suite 505

Roanoke, Virginia 24011

Phone; 540-857-2838 Fax: 540-857-2844

Webb.King@usdoj.gov

United States Trustee

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

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Exhibit B

Redline

HUNTON ANDREWS KURTH LLP

Joseph P. Rovira (admitted *pro hac vice*) Catherine A. Rankin (admitted *pro hac vice*) 600 Travis Street, Suite 4200 Houston, Texas 77002 Telephone: (713) 220-4200

Counsel for Debtor and Debtor in Possession

HUNTON ANDREWS KURTH LLP

Telephone: (804) 788-8200

Tyler P. Brown (VSB No. 28072) Henry P. (Toby) Long, III (VSB No. 75134) Riverfront Plaza, East Tower 951 East Byrd Street Richmond, Virginia 23219

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

Chapter 11 In re:

HOPEMAN BROTHERS, INC., Case No. 24-32428 (KLP)

Debtor.

ORDER GRANTING FOURTH INTERIM APPLICATION OF HUNTON ANDREWS KURTH LLP, COUNSEL FOR THE DEBTOR AND DEBTOR IN POSSESSION, FOR ALLOWANCE OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM MARCH 1, 2025 THROUGH AND INCLUDING MAY 31, 2025

Upon consideration of the Fourth Interim Fee Application (the "Application")¹ of Hunton Andrews Kurth LLP ("Hunton"), counsel for Hopeman Brothers, Inc., as debtor and debtor in possession (the "Debtor"), for the period from March 1, 2025, through and including May 31, 2025 (the "Fourth Interim Application Period"); and Hunton having agreed to voluntarily reduce the compensation sought in the Application by \$795.00 at the request of the United States Trustee, reducing the compensation sought in the Application from \$1,139,958.50 to \$1,139,163.50; and the Court having reviewed the Application and the Monthly Statements that

Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

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were served by Hunton during the Fourth Interim Application Period, and finding that the Court

has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining that

proper and adequate notice has been given and that no other or further notice is necessary; and

after due deliberation thereon; and good and sufficient cause appearing therefore,

IT IS HEREBY ORDERED that:

1. The Application is GRANTED.

2. Hunton is allowed interim compensation in the amount of

\$1,139,958.501,139,163.50 and reimbursement of expenses in the amount of \$11,532.54 for the

Fourth Interim Application Period as requested in the Application.

3. The Debtor is authorized and directed to disburse to Hunton payment in the

amount of the difference between the allowed amounts and the actual monthly payments

previously received by Hunton for fees and expenses incurred during the Fourth Interim

Application Period.

4. The Debtor is authorized and empowered to take such actions as may be

necessary and appropriate to implement the terms of this Order.

5. This Court shall retain jurisdiction with respect to all matters relating to the

interpretation or implementation of this Order.

6. This Order shall be effective immediately upon entry.

Dated: , 2025

UNITED STATES BANKRUPTCY JUDGE

<u>2</u>

WE ASK FOR THIS:

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

Tyler P. Brown (VSB No. 28072)

Henry P. (Toby) Long, III (VSB No. 75134)

HUNTON ANDREWS KURTH LLP

Riverfront Plaza, East Tower

951 East Byrd Street

Richmond, Virginia 23219 Telephone: (804) 788-8200 Facsimile: (804) 788-8218

Email: tpbrown@HuntonAK.com

hlong@HuntonAK.com

- and -

Joseph P. Rovira (admitted *pro hac vice*) Catherine A. Rankin (admitted *pro hac vice*)

HUNTON ANDREWS KURTH LLP

600 Travis Street, Suite 4200

Houston, TX 77002

Telephone: (713) 220-4200 Facsimile: (713) 220-4285

Email: josephrovira@HuntonAK.com

crankin@HuntonAK.com

Counsel for the Debtor and Debtor in Possession

SEEN AND NO OBJECTION:

/s/ B. Webb King

B. Webb King (VSB No. 47044)

Trial Attorney

Office of The United States Trustee

210 First Street, Suite 505

Roanoke, Virginia 24011

Phone; 540-857-2838 **Fax**: 540-857-2844

Webb.King@usdoj.gov

United States Trustee

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

Summary report: Litera Compare for Word 11.10.0.38 Document comparison done on 8/15/2025 10:42:11 AM			
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