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*Counsel for Debtor and Debtor in Possession*

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

**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

:  
: **Chapter 11**  
:  
: **Case No. 24-32428 (KLP)**  
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:  
:  
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**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 Stout Risius Ross, LLC, Financial Advisor to the Debtor, for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses for the Period from March 1, 2025 Through and Including May 31, 2025* [Docket No. 1008] (the “Stout Fee Application”). A proposed form of order is annexed to the Stout Fee Application (the “Original Proposed Order”).

The undersigned certifies that the Debtor served the Stout 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



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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 Stout Fee Application, all objections to the approval of the relief requested in the Stout Fee Application were due on or before August 14, 2025.

In response to informal comments received to the Stout 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 Stout Risius Ross, LLC, Financial Advisor to the Debtor, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred During 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 Stout Fee Application includes a statement that the Stout 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 Stout Fee Application appears thereon.

Therefore, pursuant to the notice filed with the Stout 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)

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*Counsel for the Debtor and Debtor in Possession*

**Exhibit A**

**Revised Proposed Order**

**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 FOURTH INTERIM FEE APPLICATION OF  
STOUT RISIUS ROSS, LLC, FINANCIAL ADVISOR TO THE DEBTOR,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED DURING THE  
PERIOD MARCH 1, 2025 THROUGH AND INCLUDING MAY 31, 2025**

Upon the fee application (the “Application”)<sup>1</sup> of Stout Risius Ross, LLC (“Stout”), as financial advisor to Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), for entry of an order (this “Order”): (a) awarding Stout compensation for professional services provided in the amount of **\$43,032.00** during March 1, 2025 through and including May 31, 2025 (the “Fourth Interim Application Period”); and Stout having agreed to voluntarily reduce the compensation sought in the Application by \$4,724.00 at the request of the United States Trustee, reducing the compensation sought in the Application from **\$43,032.00** to **\$38,308;.00** (b) authorizing and directing the Debtor to remit payment to Stout for such fees; and (c) granting such other relief as is appropriate under the circumstances, all as more fully set forth in the Application; and the Court having jurisdiction over the Application; and due and adequate notice of the Application having been given pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the

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<sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Application.

Local Rules; and the Court having read and considered the Application; objections to the Application, if any, and arguments of counsel, if any; and any objections to the Application having been resolved or overruled; and after due deliberation and for good cause shown, it is HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.
2. Stout is allowed interim compensation in the amount of **\$38,308.00** for compensation of professional services rendered during the Fourth Interim Application Period, as requested in the Application.
3. The Debtor is hereby authorized and directed to pay to Stout all outstanding fees in the amount of **\$38,308;.00** as allowed pursuant to this Order.
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

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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**  
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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



**Exhibit B**

**Redline**

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

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**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

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**ORDER GRANTING FOURTH INTERIM FEE APPLICATION OF  
STOUT RISIUS ROSS, LLC, FINANCIAL ADVISOR TO THE DEBTOR,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED DURING THE  
PERIOD MARCH 1, 2025 THROUGH AND INCLUDING MAY 31, 2025**

Upon the fee application (the “Application”)<sup>1</sup> of Stout Risius Ross, LLC (“Stout”), as financial advisor to Hopeman Brothers, Inc., as debtor and debtor in possession (the “Debtor”), for entry of an order (this “Order”): (a) awarding Stout compensation for professional services provided in the amount of **\$43,032.00** during March 1, 2025 through and including May 31, 2025 (the “Fourth Interim Application Period”); and Stout having agreed to voluntarily reduce the compensation sought in the Application by \$4,724.00 at the request of the United States Trustee, reducing the compensation sought in the Application from \$43,032.00 to \$38,308;.00 (b) authorizing and directing the Debtor to remit payment to Stout for such fees; and (c) granting such other relief as is appropriate under the circumstances, all as more fully set forth in the Application; and the Court having jurisdiction over the Application; and due and adequate notice of the Application having been given pursuant to the Bankruptcy Code, the Bankruptcy

---

<sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Application.

Rules, and the Local Rules; and the Court having read and considered the Application; objections to the Application, if any, and arguments of counsel, if any; and any objections to the Application having been resolved or overruled; and after due deliberation and for good cause shown, it is HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.

2. Stout is allowed interim compensation in the amount of \$~~43,032.00~~38,308.00 for compensation of professional services rendered during the Fourth Interim Application Period, as requested in the Application.

3. The Debtor is hereby authorized and directed to pay to Stout all outstanding fees in the amount of \$~~43,032.00~~38,308;.00 as allowed pursuant to this Order.

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

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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)  
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*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  
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Phone: 540-857-2838  
Fax: 540-857-2844  
[Webb.King@usdoj.gov](mailto: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

<b>Summary report:</b> <b>Litera Compare for Word 11.10.0.38 Document comparison done on</b> <b>8/15/2025 10:41:20 AM</b>	
<b>Style name:</b> Firm Standard	
<b>Intelligent Table Comparison:</b> Active	
<b>Original DMS:</b> iw://hunton.cloudimanage.com/DMS/352441050/1	
<b>Modified DMS:</b> iw://hunton.cloudimanage.com/DMS/352441050/4	
<b>Changes:</b>	
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<del>Delete</del>	2
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Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
<b>Total Changes:</b>	16