

**CAPLIN & DRYSDALE, CHARTERED**

Kevin C. Maclay (admitted *pro hac vice*)  
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*Special Insurance Counsel for the Official  
Committee of Unsecured Creditors*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

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

On July 16, 2025, Morgan, Lewis & Bockius LLP (“**Morgan Lewis**”)<sup>1</sup> filed the *Fourth Interim Fee Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of March 1, 2025 through May 31, 2025* [Docket No. 1031] (“**Application**”) with the United States Bankruptcy Court for the

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



Eastern District of Virginia. A proposed form of order is annexed to the Application (the “**Original Proposed Order**”).

The undersigned certifies that the Application was filed and served in accordance with the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 162] (the “**Interim Compensation Order**”) and Procedures for Complex Chapter 11 Cases in the Eastern District of Virginia, 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 Order and the notice served with the Application, all objections to the approval of the relief requested in the Application were due on or before August 14, 2025.

In response to informal comments received from the Office of The United States Trustee, Morgan Lewis has made certain revisions to the Original Proposed Order and hereby is filing a revised form of order granting the Application (the “**Revised Proposed Order**”), attached hereto as Exhibit A. Also attached as Exhibit B is a redline of the Revised Proposed Order compared to the Original Proposed Order.

The undersigned further certifies that the notice filed with the Application includes a statement that the 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 Application appears thereon, nor is he aware of any informal answer or objection to the Application.

Therefore, pursuant to the notice filed with the Application and the Interim Compensation Order, Morgan Lewis is authorized, and intends, to submit the Revised Proposed Order, without

further notice or hearing. The Office of The United States Trustee has reviewed and authorized Morgan Lewis to add her endorsement to the Revised Proposed Order.

Dated: August 15, 2025

CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

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# **EXHIBIT**

## **A**

**CAPLIN & DRYSDALE, CHARTERED**

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

In re:

HOPEMAN BROTHERS, INC.,  
  
Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**ORDER GRANTING THE FOURTH INTERIM FEE APPLICATION OF  
MORGAN, LEWIS & BOCKIUS LLP AS SPECIAL INSURANCE COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE  
INTERIM PERIOD OF MARCH 1, 2025 THROUGH MAY 30, 2025**

Under consideration of the *Fourth Interim Fee Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of March 1, 2025 through May 30, 2025* (the “**Fee Application**”);<sup>1</sup> and the Court having reviewed the Fee Application, the matters contained therein, and exhibits thereto and

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

having found that the attorneys' fees accrued and expenses incurred should be allowed as set forth herein and paid by the above-captioned debtor (the "**Debtor**"), the Court orders as follows:

1. The Fee Application is approved as set forth herein.
2. Morgan Lewis is hereby granted, on an interim basis, allowance of compensation for professional services rendered and reimbursement for expenses incurred for the period from March 1, 2025 through May 30, 2025, in the amount of \$212,113.50 in fees and \$9,247.56 in expenses.<sup>2</sup>
3. The Debtor is hereby authorized and directed to remit to Morgan Lewis all unpaid fees and expenses allowed pursuant to this Order.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

Dated: \_\_\_\_\_, 2025  
Richmond, Virginia

\_\_\_\_\_  
HONORABLE KEITH L. PHILLIPS  
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: \_\_\_\_\_

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<sup>2</sup> This includes a reduction of \$9,232.50 in fees as agreed upon by Morgan Lewis and the Office of The United States Trustee, in response to informal comments from the Office of The United States Trustee on the Fee Application.

WE ASK FOR THIS:

CAPLIN & DRYSDALE, CHARTERED

/s/ Jeffrey A. Liesemer

Kevin C. Maclay (admitted *pro hac vice*)  
Todd E. Phillips (admitted *pro hac vice*)  
Jeffrey A. Liesemer (VSB No. 35918)  
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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors*

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

**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/ Jeffrey A. Liesemer



# **EXHIBIT B**

**CAPLIN & DRYSDALE, CHARTERED**

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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
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In re:

HOPEMAN BROTHERS, INC.,  
  
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Chapter 11

Case No. 24-32428 (KLP)

**ORDER GRANTING THE FOURTH INTERIM FEE APPLICATION OF  
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TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE  
INTERIM PERIOD OF MARCH 1, 2025 THROUGH MAY 30, 2025**

Under consideration of the *Fourth Interim Fee Application of Morgan, Lewis & Bockius LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors for the Interim Period of March 1, 2025 through May 30, 2025* (the “**Fee Application**”);<sup>1</sup> and the Court having reviewed the Fee Application, the matters contained therein, and exhibits thereto and

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

having found that the attorneys' fees accrued and expenses incurred should be allowed as set forth herein and paid by the above-captioned debtor (the "**Debtor**"), the Court orders as follows:

1. The Fee Application is approved as set forth herein.
2. Morgan Lewis is hereby granted, on an interim basis, allowance of compensation for professional services rendered and reimbursement for expenses incurred for the period from March 1, 2025 through May 30, 2025, in the ~~aggregate~~ amount of ~~\$230,593.56~~ \$212,113.50 in fees and \$9,247.56 in expenses.<sup>2</sup>
3. The Debtor is hereby authorized and directed to remit to Morgan Lewis all unpaid fees and expenses allowed pursuant to this Order.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

Dated: \_\_\_\_\_, 2025  
Richmond, Virginia

\_\_\_\_\_  
HONORABLE KEITH L. PHILLIPS  
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: \_\_\_\_\_

<sup>2</sup> This includes a reduction of \$9,232.50 in fees as agreed upon by Morgan Lewis and the Office of The United States Trustee, in response to informal comments from the Office of The United States Trustee on the Fee Application.

WE ASK FOR THIS:

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/s/ Jeffrey A. Liesemer

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*Special Insurance Counsel to the Official  
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**SEEN AND NO OBJECTION:**

/s/ B. Webb King

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I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Jeffrey A. Liesemer