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*Counsel for Hartford Accident and Indemnity  
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**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

Chapter 11

Case No. 24-32428 (KLP)

**HARTFORD'S NOTICE OF WITHDRAWAL OF PLAN OBJECTIONS**

PLEASE TAKE NOTICE that, based on the Plan Proponents' agreement to modify sections 1.10 and 8.18 of the *Modified Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code* (Dkt. No. 1141) (the "Plan") as described on the record of the hearing on this date, Hartford Accident and Indemnity Company and First State Insurance Company (together, "Hartford") hereby withdraw *Hartford's Limited Objection to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code* (Dkt. No. 942) and *Hartford's Joinder to Objections to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code* (Dkt. No. 965) (together, the "Hartford Objections").



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PLEASE TAKE FURTHER NOTICE that if the Plan Proponents make other modifications to the Plan or the *Notice of (i) Proposed Findings and Conclusions, (ii) Proposed Confirmation Order, and (iii) Proposed Order Recommending Adoption of the Findings and Conclusions and Entry of the Confirmation Order* (Dkt. No. 1120) (the “Proposed Order”) after the filing of this notice that adversely affect Hartford’s interests, Hartford reserves all its rights to refile the Hartford Objections or to file other or additional objections to the Plan or Proposed Order in response to such modifications.

Dated: August 25, 2025

/s/ James W. Burke

James W. Burke (VSB No. 76551)

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I submitted the foregoing through the Court's CM/ECF system, causing a true and correct copy to be electronically delivered and served on all parties registered to receive electronic notices in this case via that system.

Dated: August 25, 2025

/s/ James W. Burke

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