

**CHOATE, HALL & STEWART LLP**

Douglas R. Gooding (admitted *pro hac vice*)  
Jonathan D. Marshall (admitted *pro hac vice*)  
2 International Place  
Boston, MA 02110  
Telephone: (617) 248-5000  
Emails: dgooding@choate.com  
jmarshall@choate.com

*Co-Counsel to Liberty Mutual Insurance  
Company*

**KAUFMAN & CANOLES, P.C.**

Douglas M. Foley (VSB No. 34364)  
Two James Center  
1021 E. Cary Street, Suite 1400  
Richmond, Virginia 23219  
Telephone: (804) 771-5746  
Email: dmfoley@kaufcan.com

*Co-Counsel to Liberty Mutual Insurance  
Company*

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

**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

**Chapter 11**

**Case No. 24-32428 (KLP)**

**CONSENT MOTION TO EXTEND DEADLINES TO OBJECT TO  
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW REGARDING  
CONFIRMATION OF THE MODIFIED AMENDED PLAN OF REORGANIZATION  
OF HOPEMAN BROTHERS, INC. UNDER CHAPTER 11 OF THE  
BANKRUPTCY CODE AND APPROVING ADEQUACY  
OF THE DISCLOSURE STATEMENT**

Liberty Mutual Insurance Company (“Liberty”), and The Travelers Indemnity Company, Travelers Casualty and Surety Company, formerly known as The Aetna Casualty and Surety Company and St. Paul Fire and Marine Insurance Company (“Travelers” and collectively with Liberty, “Movants”), hereby files this consent motion (the “Motion”), to extend the time under Federal Rule of Bankruptcy 9033(b)(1) (“FRBP 9033”) to object, and respond to objections, to the *Proposed Findings of Fact and Constitution of Law Regarding Confirmation of the Modified Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy*



*Code and Approving Adequacy of the Disclosure Statement* [ECF 1267] (“Proposed Findings”), and in support thereof states as follows:

1. The Court issued its Proposed Findings on October 31, 2025 [ECF 1267]. The Proposed Findings are extensive and cover significant issues, evidence, and objections presented at the confirmation evidentiary hearing held on August 25<sup>th</sup> and 26<sup>th</sup>, 2025.

2. Pursuant to FRBP 9033, upon issuance of the Proposed Findings, parties have 14 days to file and serve objections, and parties may file responses to other objections 14 days thereafter. Currently, those dates would fall on November 14<sup>th</sup> and December 1<sup>st</sup> respectively.

3. After consultation with the respective parties, Liberty requests that these dates be moved to November 24<sup>th</sup> and December 12<sup>th</sup> respectively for all parties.

4. Given the extensive nature of the Proposed Findings, the number of issues and parties, the intervening Thanksgiving Holiday, the short extension requested, and the consent of the effected parties, Movants submit that “cause” exists under FRBP 9033(b)(3) to extend the time periods in FRBP 9033(b)(1) to November 24<sup>th</sup> and December 12<sup>th</sup> respectively.

5. The relief requested herein is supported by the Debtor, the Committee, and the insurer objecting parties<sup>1</sup> who participated in the confirmation hearing in order to allow the parties sufficient time to lodge any objections to the Proposed Findings, and respond to any lodged objections to the Proposed Findings.

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<sup>1</sup> In addition to Liberty and Travelers, Century Indemnity Company and Westchester Fire Insurance Company (“Chubb Insurers”) consent to this Motion, and their counsel have endorsed the consent order attached as Exhibit A.

**WHEREFORE**, Movants respectfully requests that the Court enter the proposed consent order attached hereto as Exhibit A granting the relief requested herein.

Date: November 10, 2025

Respectfully submitted,

/s/ Douglas M. Foley

Douglas M. Foley (Bar No. 34364)  
KAUFMAN & CANOLES, P.C.  
Two James Center  
1021 E. Cary St., Suite 1400  
Richmond, VA 23219  
Telephone: (804) 771-5746  
Facsimile: (888) 360-9092  
Email: dmfoley@kaufcan.com

– and –

Douglas R. Gooding (admitted *pro hac vice*)  
Jonathan D. Marshall (admitted *pro hac vice*)  
CHOATE, HALL & STEWART LLP  
Two International Place  
Boston, MA 02110  
Telephone: (617) 248-5000  
Emails: dgooding@choate.com  
Jmarshall@choate.com  
*Co-Counsel for Liberty Mutual Insurance Company*

/s/ Joshua R. Taylor

Joshua R. Taylor (VSB No. 45919)  
Catherine D. Cockerham (admitted *pro hac vice*)  
Jefferson Klocke (admitted *pro hac vice*)  
Steptoe LLP  
1330 Connecticut Avenue, N.W.  
Washington, DC 20036  
Telephone: (202) 429-3000  
Emails: jrtaylor@steptoe.com  
ccockerham@steptoe.com  
jklocke@steptoe.com  
*Counsel for The Travelers Indemnity Company, Travelers Casualty and Surety Company, Formerly Known as The Aetna Casualty and Surety Company, And St. Paul Fire and Marine Insurance Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 10, 2025, a true copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send a notification of electronic filing (NEF) to all creditors and parties in interest.

/s/ Douglas M. Foley

# **Exhibit A**

## **Proposed Consent Order**

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

In re:

HOPEMAN BROTHERS, INC.

Debtor.

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) Chapter 11  
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) Case No. 24-32428  
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**CONSENT ORDER GRANTING EXTENSION OF TIME TO FILE OBJECTIONS  
AND RESPONSES TO PROPOSED FINDING OF FACTS AND CONCLUSIONS OF  
LAW REGARDING CONFIRMATION OF THE MODIFIED AMENDED PLAN OF  
REORGANIZATION OF HOPEMAN BROTHERS, INC UNDER CHAPTER 11  
OF THE BANKRUPTCY CODE AND APPROVING  
ADEQUACY OF THE DISCLOSURE STATEMENT**

Upon consideration of Liberty Mutual Insurance Company's and The Travelers Indemnity Company's, Travelers Casualty and Surety Company's, formerly known as The Aetna Casualty and Surety Company and St. Paul Fire and Marine Insurance Company's consent motion to extend the time under Federal Rule of Bankruptcy 9033(b)(1) ("FRBP 9033") (the "Motion") to object, and respond to objections, to the *Proposed Findings of Fact and Conclusions of Law Regarding Confirmation of the Modified Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code and Approving Adequacy of the Disclosure Statement* [ECF 1267] ("Proposed Findings"), the Court finds cause exists under FRBP 9033(b)(3) to grant the Motion and hereby ORDERS as follows:

1. The time period for all parties to file objections to the Proposed Findings, in accordance with FRBP Rule 9033(b)(1), hereby is extended from November 14, 2025, to November 24, 2025.

2. The time period for a party to respond to another party's objections to the Proposed Findings, in accordance with FRBP 9033(b)(1), hereby extended from December 1, 2025, to December 12, 2025.

Richmond, Virginia, this \_\_\_\_ day of November, 2025.

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Bankruptcy Judge Keith L. Phillips

**WE ASK FOR THIS:**

s/ Douglas M. Foley  
Douglas M. Foley (VSB No. 34364)  
Kaufman & Canoles, P.C.  
Two James Center  
1021 E. Cary Street, Suite 1400  
Richmond, Virginia 23219  
Telephone: (804) 771-5746  
Facsimile: (888) 360-9092  
Email: dmfoley@kaufcan.com

-and-

Douglas R. Gooding (*Admitted Pro hac vice*)  
Kevin J. Finnerty (*Admitted Pro hac vice*)  
Jonathan D. Marshall (*Admitted Pro hac vice*)  
Choate, Hall & Stewart LLP  
Two International Place  
Boston, Massachusetts 02110  
Telephone: (617) 248-5000  
Facsimile: (617) 502-5277  
Emails: dgooding@choate.com  
kfinnerty@choate.com  
jmarshall@choate.com

*Co-Counsel to Liberty Mutual Insurance Company*

/s/ Joshua R. Taylor

Joshua R. Taylor (VSB No. 45919)  
Catherine D. Cockerham (admitted *pro hac vice*)  
Jefferson Klocke (admitted *pro hac vice*)  
Steptoe LLP  
1330 Connecticut Avenue, N.W.  
Washington, DC 20036  
Telephone: (202) 429-3000  
Emails: jrtaylor@steptoe.com  
ccockerham@steptoe.com  
jklocke@steptoe.com

*Counsel for The Travelers Indemnity Company,  
Travelers Casualty and Surety Company, formerly  
Known as The Aetna Casualty and Surety Company,  
And St. Paul Fire and Marine Insurance Company*

**SEEN AND AGREED:**

/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  
Emails: 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  
Emails: josephrovira@HuntonAK.com  
crankin@HuntonAK.com

*Counsel for the Debtor and Debtor in Possession*



/s/ Jeffrey A. Liesemer

Jeffrey A. Liesemer (VSB No. 35918)  
Caplin & Drysdale, Chartered  
1200 New Hampshire Avenue NW, 8<sup>th</sup> Floor  
Washington, DC 20036  
Telephone: (202) 862-5000  
Email: jliesemer@capdale.com

*Counsel for the Official Committee of Unsecured Creditors*

/s/ James Donaldson

Dabney J. Carr (VSB No. 28679)  
James K. Donaldson (VSB No. 80307)  
Troutman Pepper Locke LLP  
1001 Haxall Point, Suite 1500  
Richmond, VA 23219  
Telephone: (804) 697-1200

-and-

Leslie A. Davis (admitted *pro hac vice*)  
Michael T. Carolan (admitted *pro hac vice*)  
Troutman Pepper Locke LLP  
401 9<sup>th</sup> Street, NW  
Washington, DC 20004  
Telephone: (202) 274-2950

- and -

Patricia B. Santelle (admitted *pro hac vice*)  
White and Williams LLP  
1650 Market Street  
One Liberty Place, Suite 1800  
Philadelphia, PA 19103  
Telephone: (215) 864-7000

*Counsel for Century Indemnity Company and  
Westchester Fire Insurance Company*

**CERTIFICATION OF ENDORSEMENT  
UNDER LOCAL BANKRUPTCY RULE 9022-1(C)**

I hereby certify that the foregoing proposed Consent Order has been endorsed by, or served on all necessary parties.

/s/ Douglas M. Foley