

STEPTOE LLP

Joshua R. Taylor (VSB No. 45919)
Catherine D. Cockerham (admitted *pro hac vice*)
Jefferson Klocke (admitted *pro hac vice*)
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036
Telephone: (202) 429-3000
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*

**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 REGARDING
TRAVELERS' MOTION TO SEAL [DKT. NO. 1315] AND
NOTICE OF FILING OF REVISED PROPOSED ORDER**

On November 24, 2025, 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 (collectively, "Travelers") filed their *Motion for Entry of an Order Authorizing Travelers to File Under Seal Its Unredacted Objections to the Bankruptcy Court's Findings and Conclusions and to File Publicly a Redacted Version of Its Objections to the Bankruptcy Court's Findings and Conclusions* [Dkt. No. 1315] (the "Motion"). A proposed form of order was attached to the Motion as Exhibit A (the "Proposed Order"). The undersigned certifies



that Travelers served the Motion and Notice of Motion and Notice of Hearing [Dkt. No. 1316] on all necessary parties on November 24, 2025, in accordance with the “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. *See* Dkt. No. 1317. Pursuant to the Case Management Procedures and the notice served with the Motion, all responses to the approval of the relief requested in the Motion were due on or before December 9, 2025.

The undersigned further certifies that the notice filed with the Motion includes a statement that the Motion may be granted and an order entered without a hearing unless a timely objection is made. *See* Dkt. No. 1316. 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 Motion appears thereon.

Thus, pursuant to the notice filed with the Motion and the Complex Case Procedures, Travelers is authorized, and intends, to submit, without further notice or hearing, a Revised Proposed Order. In accordance with Section V.E. of the Case Management Procedures, a redline reflecting changes to the originally filed Proposed Order is attached hereto as Exhibit A and a clean copy of the form of order is attached as Exhibit B.

Dated: December 10, 2025

Respectfully submitted,

/s/ Joshua R. Taylor

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Exhibit A

Redline

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

In re:

Chapter 11

HOPEMAN BROTHERS, INC.,

Case No. 24-32428 (KLP)

Debtor.

**ORDER GRANTING TRAVELERS' MOTION FOR ENTRY OF AN ORDER
AUTHORIZING TRAVELERS TO FILE UNDER SEAL ITS UNREDACTED
OBJECTION TO THE BANKRUPTCY COURT'S FINDINGS AND CONCLUSIONS
AND TO FILE PUBLICLY A REDACTED VERSION OF ITS OBJECTION TO THE
BANKRUPTCY COURT'S FINDINGS AND CONCLUSIONS**

Upon the motion (the "Motion"¹) of 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 (together, "Travelers") ~~for entry of an order~~, under 11 U.S.C. §§ 105(a) and 107(b)(1), Fed. R. Bankr. P. 9018, and the Protective Order, for entry of an order: authorizing Travelers to file under seal an unredacted copy of Travelers'

¹ Capitalized terms used but not otherwise defined in this Order have the meaning ascribed to them in the Motion.

Objections to the Bankruptcy Court's 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 (the "Bankruptcy Court's Findings and Conclusion") and to File Publicly a Redacted Version of its Objections to the Bankruptcy Court's Findings and Conclusions; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that the venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the parties in interest; and the Court having found that Travelers' notice of the Motion was appropriate under the circumstances, and no other notice need be provided; and the Court having reviewed and considered the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth in this Order.
2. Under Standing Order No. 25-4, Travelers is ~~authorized to file the unredacted Travelers' Objections to the Bankruptcy Court's Findings and Conclusions under seal, which~~ ordered to submit to this Court paper copies of the sealed documents in a sealed envelope, with a copy of this Order affixed to the sealed envelope, which sealed documents shall be maintained as sealed under 11 U.S.C. 107(c).
3. Travelers is authorized to publicly file its Objections to the Bankruptcy Court's Findings and Conclusions with redactions, ~~contemporaneously with the transmittal of the unredacted~~

~~Objections to this Court's chambers.~~

4. The unredacted ~~and unsealed~~ Objections to the Bankruptcy Court's Findings and Conclusions shall not be disseminated to anyone other than the Court and counsel to the Debtors, the Official Committee of Unsecured Creditors, and the Future Claimants' Representative.

5. Any party receiving an unredacted copy of the Objections to the Bankruptcy Court's Findings and Conclusions shall, at all times, keep the information contained therein strictly confidential and shall not disclose such information to any party whatsoever.

6. The terms and conditions of this Order shall be effective immediately and enforceable upon its entry.

7. The requirement under Local Rule 9013-1(G) to file a memorandum of law in connection with the Motion is hereby waived to the extent applicable.

8. This Court shall retain jurisdiction with respect to all matters arising out of or related to the interpretation or enforcement of this Order.

Dated: _____, 2025
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: _____

WE ASK FOR THIS:

/s/ Joshua R. Taylor
STEPTOE LLP
Joshua R. Taylor (VSB No. 45919)
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and St. Paul Fire and Marine Insurance Company*

**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/ Joshua R. Taylor

Exhibit B

Proposed Order

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

In re:

HOPEMAN BROTHERS, INC.,

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AUTHORIZING TRAVELERS TO FILE UNDER SEAL ITS UNREDACTED
OBJECTION TO THE BANKRUPTCY COURT'S FINDINGS AND CONCLUSIONS
AND TO FILE PUBLICLY A REDACTED VERSION OF ITS OBJECTION TO THE
BANKRUPTCY COURT'S FINDINGS AND CONCLUSIONS**

Upon the motion (the "Motion"¹) of 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 (together, "Travelers"), under 11 U.S.C. §§ 105(a) and 107(b)(1), Fed. R. Bankr. P. 9018, and the Protective Order, for entry of an order: authorizing Travelers to file under seal an unredacted copy of Travelers' Objections to the Bankruptcy Court's 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 (the "Bankruptcy Court's Findings and Conclusion") and to File Publicly a Redacted Version of its Objections to the Bankruptcy Court's Findings and Conclusions; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that the venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that

¹ Capitalized terms used but not otherwise defined in this Order have the meaning ascribed to them in the Motion.

the relief requested in the Motion is in the best interests of the parties in interest; and the Court having found that Travelers' notice of the Motion was appropriate under the circumstances, and no other notice need be provided; and the Court having reviewed and considered the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth in this Order.
2. Under Standing Order No. 25-4, Travelers is ordered to submit to this Court paper copies of the sealed documents in a sealed envelope, with a copy of this Order affixed to the sealed envelope, which sealed documents shall be maintained as sealed under 11 U.S.C. 107(c).
3. Travelers is authorized to publicly file its Objections to the Bankruptcy Court's Findings and Conclusions with redactions.
4. The unredacted Objections to the Bankruptcy Court's Findings and Conclusions shall not be disseminated to anyone other than the Court and counsel to the Debtors, the Official Committee of Unsecured Creditors, and the Future Claimants' Representative.
5. Any party receiving an unredacted copy of the Objections to the Bankruptcy Court's Findings and Conclusions shall, at all times, keep the information contained therein strictly confidential and shall not disclose such information to any party whatsoever.
6. The terms and conditions of this Order shall be effective immediately and enforceable upon its entry.
7. The requirement under Local Rule 9013-1(G) to file a memorandum of law in connection with the Motion is hereby waived to the extent applicable.

8. This Court shall retain jurisdiction with respect to all matters arising out of or related to the interpretation or enforcement of this Order.

Dated: _____, 2025
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: _____

WE ASK FOR THIS:

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

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

/s/ Joshua R. Taylor