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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)**
:
:
:
:

**PROPOSED AGENDA FOR HEARING
ON AUGUST 21, 2025, AT 10:00 A.M. (PREVAILING EASTERN TIME)**

PLEASE TAKE NOTICE that the following matters are scheduled for hearing in-person and by remote video conference on August 21, 2025, at 10:00 A.M. (prevailing Eastern Time). Interested parties who wish to “*listen only*” by video or audio may do so by registering in advance at:

https://www.zoomgov.com/meeting/register/fE0IexadSO2_T3eupxYncA

Chambers instructed the Debtor to indicate on the agenda that parties who wish to *participate* in the hearing by video or audio must follow the instructions on the Court’s website, which include submitting to Chambers the remote hearing request form available at <https://www.vaeb.uscourts.gov/bankruptcy-forms>.



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I. UNCONTESTED MATTERS

1. **“Stout Fee Application”** – *Fourth Interim Application of Stout Risius Ross, LLC, Financial Advisor for the Debtor, for Allowance of Interim Compensation and Reimbursement of Expenses Incurred for the Period from March 1, 2025 Through and Including May 31, 2025* [Docket No. 1008].

Related Documents:

- i. *Notice of Fourth Interim Fee Applications and Notice of Hearing* [Docket No. 1010].
- ii. *Certificate of No Objection and Notice of Filing of Revised Proposed Order* [Docket No. 1110].

Response Deadline: August 14, 2025 at 12:00 p.m. (prevailing Eastern Time).

Responses: None.

Status: The Debtor has submitted an Order to the Court for entry.

II. CONTESTED MATTERS

A. Adversary Proceeding, *Liberty Mutual Insurance Co. v. Hopeman Brothers, Inc., et. al.* (Case No. AP 25-03020)

2. **“Reference Order”** - *Order Referring Motion to Withdraw to Bankruptcy Judge* [Civil No. 3:25cv603 (DJN), Docket No. 3].

Related Documents:

- i. **“Motion to Withdraw the Reference”** – **SEALED** *Plaintiff Liberty Mutual Insurance Company’s Motion to Withdraw the Reference and Supporting Memorandum* [AP 25-03020, Docket No. 4].
- ii. **REDACTED** *Plaintiff Liberty Mutual Insurance Company’s Motion to Withdraw the Reference and Supporting Memorandum* [AP 25-03020, Docket No. 6].
- iii. *Notice of Motion to Withdraw the Reference* [AP 25-03020, Docket No. 8].

Response Deadline: July 7, 2025.

Responses:

- iv. *[Committee’s] Objection to Liberty’s Motion to Withdraw the Reference* [AP 25-03020, Docket No. 30].

- v. *Response of the Future Claimants' Representative to Plaintiff Liberty Mutual Insurance Company's Motion to Withdraw the Reference and Supporting Memorandum* [AP 25-03020, Docket No. 31].
- vi. *Objection of the Debtor to Plaintiff Liberty Mutual Insurance Company's Motion to Withdraw the Reference and Supporting Memorandum* [AP 25-03020, Docket No. 32].
- vii. *Huntington Ingalls Industries, Inc.'s Joinder to Objections to Motion to Withdraw the Reference* [AP 25-03020, Docket No. 34].
- viii. *Objection [of Landry & Swarr Clients and SGP Clients] to Liberty's Motion to Withdraw Reference and Joinder to Committee Objection* [AP 25-03020, Docket No. 36].
- ix. *Plaintiff Liberty Mutual Insurance Company's Omnibus Reply to Objections to Motion to Withdraw the Reference* [AP 25-03020, Docket No. 44].

Status: The District Court entered the Reference Order, on August 19, 2025, among other things, referring the Motion to Withdraw the Reference to this Court for proposed findings of fact and conclusions of law.

3. **“Motion to Stay”** – *Plaintiff Liberty Mutual Insurance Company's Motion to Stay Adversary Proceeding Pending Motion to Withdraw the Reference* [AP 25-03020, Docket No. 52].

Related Documents:

- i. *Notice of Motion and Notice of Hearing* [AP 25-03020 Docket No. 53].

Response Deadline: August 18, 2025.

Responses:

- ii. *Objection to Plaintiff Liberty Mutual Insurance Company's Motion to Stay Adversary Proceeding Pending Motion to Withdraw the Reference [of Clients of Boling Law Firm and Law Office of Philip C. Hoffman]* [AP 25-03020, Docket No. 53].
- iii. *Response of the Future Claimants' Representative to Plaintiff Liberty Mutual Insurance Company's Motion to Stay Plaintiff Adversary Proceeding Pending Motion to Withdraw the Reference* [AP 25-03020, Docket No. 61].
- iv. *[Committee's] Objection to Liberty Motion to Stay* [AP 25-03020, Docket No. 62].

- v. *Debtor's Objection to Plaintiff Liberty Mutual Insurance Company's Motion to Stay Plaintiff Adversary Proceeding Pending Motion to Withdraw the Reference* [AP 25-03020, Docket No. 63].
- vi. *Joinder to Hopeman Brothers, Inc. and the Official Committee of Unsecured Creditors' Objections to Liberty Mutual Insurance Company's Motion Stay* [AP 25-03020, Docket No. 65].
- vii. *Plaintiff Liberty Mutual Insurance Company's Omnibus Reply to Oppositions to the Motion to Stay Adversary Proceeding Pending Motion to Withdraw the Reference* [AP 25-03020, Docket No. 66].
- viii. *Joinder [of Landry & Swarr Clients and SGP Clients] to the Official Committee of Unsecured Creditors' Objections to Liberty Mutual Insurance Company's Motion to Stay* [AP 25-03020, Docket No. 71].

Status: This matter will go forward.

4. **“Motions to Dismiss” –**

Related Documents:

- i. *[Roussel & Clement Defendants'] Rule 12 Motion to Dismiss* [AP 25-03020, Docket No. 23].
 - a. *Amended Notice of Rule 12 Motion to Dismiss and Notice of Hearing* [AP 25-03020, Docket No. 26].
 - b. *Memorandum in Support of Rule 12 Motion to Dismiss* [AP 25-03020, Docket No. 24].
- ii. *[Committee's] Motion to Dismiss* [AP 25-03020, Docket No. 28].
 - a. *Notice of Motion and Notice of Hearing* [AP 25-03020, Docket No. 29].
- iii. *Debtor's Motion to Dismiss or Abstain as to First Amended Complaint for Declaratory Judgment* [AP 25-03020, Docket No. 33].
 - a. *Notice of Motion and Notice of Hearing* [AP 25-03020, Docket No. 33].
- iv. *Motion to Dismiss and Joinder [of Landy & Swarr Clients and SGP Clients]* [AP 25-03020, Docket No. 35].
 - a. *Notice of Motion and Notice of Hearing* [AP 25-03020 Docket No. 35].

- v. *FCR's Motion to Dismiss Adversary Complaint Pursuant to Rules 12(b)(1); 12(b)(2); 12(b)(6) and 12(b)(7) of the Federal Rules of Civil Procedure* [AP 25-03020 Docket No. 39].
 - a. *Brief in Support of FCR's Motion to Dismiss Adversary Complaint Pursuant to Rules 12(b)(1); 12(b)(2); 12(b)(6) and 12(b)(7) of the Federal Rules of Civil Procedure* [AP 25-03020 Docket No. 40].
- vi. *Huntington Ingalls Industries, Inc.'s Motion to Dismiss First Amended Complaint for Declaratory Judgment* [AP 25-03020, Docket No. 41].
 - a. *Notice of Motion and Notice of Hearing* [AP 25-03020 Docket No. 41].
- vii. *Motion to Dismiss First Amended Complaint for Declaratory Judgment and Incorporated Memorandum of Law in Support Thereof [of Clients of Boling Law Firm and Law Office of Philip C. Hoffman]* [AP 25-03020, Docket No. 42].
 - a. *Notice of Motion and Notice of Hearing* [AP 25-03020 Docket No. 43].

Response Deadline: August 14, 2025.

Responses:

- viii. *Opposition to Motions to Dismiss Liberty's First Amended Complaint on Procedural Grounds and Motions to Abstain* [AP 25-03020 Docket No. 59].
- ix. *Opposition to Motions to Dismiss Liberty's First Amended Complaint for Failure to State a Claim Under F.R.C.P. 12(B)(6)* [AP 25-03020 Docket No. 60].
- x. *[Roussel & Clement Defendants'] Reply Memorandum in Support of Rule 12 Motion to Dismiss* [AP 25-03020, Docket No. 65].
- xi. *[Committee's] Reply in Support of Motion to Dismiss* [AP 25-03020, Docket No. 67].
- xii. *Reply in Support of Huntington Ingalls Industries, Inc's Motion to Dismiss First Amended Complaint for Declaratory Judgment* [AP 25-03020, Docket No. 68].
- xiii. *Reply In Support of Debtor's Motion to Dismiss or Abstain First Amended Complaint for Declaratory Judgment* [AP 25-03020, Docket No. 69].

Status: This matter will go forward.

B. Bankruptcy Case

5. **“Motion in *Limine*”** – *Motion in Limine of the Debtor to Exclude the Expert Testimony of Marc C. Scarcella* [Docket No. 1089].

Related Documents:

- i. *Notice of Motions and Notice of Hearing* [Docket No. 1090].

Response Deadline: August 18, 2025.

Responses:

- ii. *Chubb Insurers’ Opposition to Debtor’s Motion in Limine to Exclude the Expert Testimony of Marc C. Scarcella* [Docket No. 1121].
- iii. *Reply in Support of Motion in Limine of the Debtor to Exclude the Expert Testimony of Marc C. Scarcella* [Docket No. 1136]

Status: This matter will go forward.

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Dated: August 20, 2025
Richmond, Virginia

/s/ Henry P. (Toby) Long, III

Tyler P. Brown (VSB No. 28072)

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