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Proposed Counsel for Debtor and Debtor in Possession

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

In re:	**Chapter 11**
HOPEMAN BROTHERS, INC.,	**Case No. 24-32428 (KLP)**
Debtor.	

SUPPLEMENTAL DECLARATION OF
TYLER P. BROWN IN SUPPORT OF THE APPLICATION OF THE DEBTOR
FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND
EMPLOYMENT OF HUNTON ANDREWS KURTH LLP AS ITS COUNSEL
<u>EFFECTIVE AS OF THE PETITION DATE</u>

I, Tyler P. Brown, hereby declare, pursuant to 28 U.S.C. § 1746, that the following

statements are true and correct, to the best of my knowledge and belief, after due inquiry described

herein.

1.   I am a partner with Hunton Andrews Kurth LLP ("<u>Hunton</u>" or the "<u>Firm</u>"), an

international law firm with lawyers in nineteen offices domestically and abroad, including an

office in Richmond, Virginia, located at 951 East Byrd Street, Richmond, Virginia 23219. I am

an attorney-at-law, duly admitted and in good standing to practice in the Commonwealth of

Virginia, the United States Bankruptcy Court for the Eastern District of Virginia, the United States

District Court for the Eastern District of Virginia, the United States Court of Appeals for the Fourth

Circuit, and the United States Supreme Court.

2.   I submit this supplemental declaration (the "Supplemental Declaration") to

supplement my declaration (the "Original Declaration"), dated July 22, 2024, attached as

Exhibit A to the *Application of the Debtor for Entry of an Order Authorizing the Retention and*

Employment of Hunton Andrews Kurth LLP as its Counsel Effective as of the Petition Date

[Docket No. 70] (the "Application")[1] for entry of an Order authorizing the Debtor to retain and

employ Hunton to represent it in this chapter 11 case. This Supplemental Declaration is intended

to supplement, and not replace, the Original Declaration.

3.   I am duly authorized to make this Supplemental Declaration on behalf of Hunton.

Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts

hereinafter set forth, and if called as a witness I would testify thereto.

4.   As set forth in paragraph 24 of the Original Declaration, I explained that Hunton

has searched its electronic database for connections with the persons and entities listed on

Schedule 1 (the "Original Parties in Interest List") attached to the Original Declaration, which I

asserted in the Original Declaration represent the Debtor's principal creditors, equity holders and

other parties in interest in this chapter 11 case.

5.   Furthermore, as set forth in paragraph 3 of the Original Declaration, I advised that

a supplemental declaration would promptly be filed to the extent any information disclosed in the

Original Declaration required amendment or modification or as additional information becomes

available.

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[1] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

6.   To that end, I hereby submit this Supplemental Declaration to confirm that Hunton has searched on its electronic database for connections with the additional persons and entities listed on Schedule 1 (collectively, the "Additional Persons and Entities") attached hereto that were not included on the Original Parties in Interest List. The Additional Persons and Entities listed on Schedule 1 attached hereto include Additional Persons and Entities in the following categories: (i) members of the Official Committee of Unsecured Creditors (the "Committee") appointed in this chapter 11 case and counsel to individual members of the Committee, (ii) proposed Committee professionals that have filed an appearance in the case and/or been identified to the Debtor, (iii) insurers, and (iv) certain asbestos claimants that have appeared in this chapter 11 case.

7.   Based on the conflicts searches conducted to date and described herein, to the best of my knowledge, neither I, nor any partner, counsel or associate of Hunton, insofar as I have been able to ascertain, currently represent or has represented, while at Hunton, within the past three years the parties listed on Schedule 1 as of the date of the filing of the Application.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: August 25, 2024   By: */s/ Tyler P. Brown*
                                                                                     Tyler P. Brown

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Schedule 1

Additional Parties in Interest Searched

1. <u>Members of the Official Committee of Unsecured Creditors and Counsel to Individual Members of the Official Committee of Unsecured Creditors</u>

    Nancy McComas-Doiron
    Darrell Kitchen
    Veronica Miller
    MRHFM Law Firm
    Melissa Beerman
    Dean Omar Branham Shirley, LLP

2. <u>Official Committee of Unsecured Creditors' Professionals</u>

    Caplin & Drysdale, Chartered
    Morgan Lewis & Bockius LLP

3. <u>Insurers</u>

    Continental Casualty Company
    Fidelity & Casualty Company
    Granite State Insurance Company
    Lexington Insurance Company
    National Union Fire Insurance Company of Pittsburgh, PA

4. <u>Asbestos Claimants that Have Appeared in the Debtor's Chapter 11 Bankruptcy Case</u>

    Janet Rivet
    Kayla Rivet
    Maxine Becky Polkey Ragusa
    Monica Dandry Hallner
    Stephanie Jean Ragusa Connors
    Valerie Ann Ragusa Primeaux