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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.** :
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**SUPPLEMENTAL DECLARATION OF
KYLE PHILIP BRINKMAN IN SUPPORT OF THE APPLICATION OF THE DEBTOR
FOR ENTRY OF AN ORDER (I) AUTHORIZING THE APPOINTMENT OF BLANK
ROME LLP AS SPECIAL INSURANCE COUNSEL EFFECTIVE AS OF THE
PETITION DATE AND (II) GRANTING RELATED RELIEF**

I, Kyle Philip Brinkman, 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 in the firm of Blank Rome LLP (“Blank Rome” or the “Firm”), proposed special counsel to Hopeman Brothers, Inc. (the “Debtor”) in this chapter 11 case. Blank Rome is a full-service law firm with more than 600 attorneys and 13 offices located in the United States and an office located in Shanghai. In particular, Blank Rome’s attorneys are experienced in matters concerning insurance coverage litigation, policy review and analysis, and negotiation of complex insurance disputes.



2. I am duly authorized to make this supplemental declaration (the “Supplemental Declaration”) on behalf of Blank Rome. 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.

3. I submit this 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 (I) Authorizing the Appointment of Blank Rome LLP as Special Insurance Counsel Effective as of the Petition Date and (II) Granting Related Relief* [Docket No. 71] (the “Application”).¹ This Supplemental Declaration is intended to supplement, and not replace, the Original Declaration.

4. As set forth in paragraph 23 of the Original Declaration, I explained that Blank Rome 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.

6. To that end, I hereby submit this Supplemental Declaration to confirm that Blank Rome 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

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

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 Blank Rome, insofar as I have been able to ascertain, currently represent or has represented, while at Blank Rome, 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/ Kyle Philip Brinkman
Kyle Philip Brinkman

Schedule 1

Additional Parties in Interest Searched

1. Members of the Official Committee of Unsecured Creditors and Counsel to Individual Members of the Official Committee of Unsecured Creditors

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

2. Official Committee of Unsecured Creditors' Professionals

Caplin & Drysdale, Chartered
Morgan Lewis & Bockius LLP

3. Insurers

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

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

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