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**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 KAYE N. COURINGTON IN SUPPORT OF
THE APPLICATION OF THE DEBTOR FOR ENTRY OF AN ORDER (I)
AUTHORIZING THE APPOINTMENT OF COURINGTON, KIEFER, SOMMERS,
MARULLO & MATHERNE, L.L.C. AS SPECIAL ASBESTOS COUNSEL EFFECTIVE
AS OF THE PETITION DATE AND (II) GRANTING RELATED RELIEF**

I, Kaye N. Courington, 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 Courington, Kiefer, Sommers, Marullo & Matherne, L.L.C. (“CKSMM” or the “Firm”), a defense litigation law firm located in Louisiana and proposed special asbestos counsel to Hopeman Brothers, Inc. (the “Debtor”). CKSMM’s attorneys specialize in litigation, mediation, and national and regional coordination services for defense needs involving, in relevant part, personal injury, toxic tort, maritime, and Jones Act claims. I am an attorney-at-law, duly admitted and in good standing to practice in the State of Louisiana.



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 (I) Authorizing the Appointment of Courington, Kiefer, Sommers, Marullo & Matherne, L.L.C. as Special Asbestos Counsel Effective as of the Petition Date and (II) Granting Related Relief* [Docket No. 72] (the “Application”).¹ 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 CKSMM and to submit this Supplemental Declaration in support of the Application. Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts hereinafter set forth.

4. As set forth in paragraph 20 of the Original Declaration, I explained that CKSMM 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 CKSMM 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 herein but not defined herein shall have the meaning 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. Schedule 2 attached hereto identifies one (1) Additional Person and Entity—Fidelity Insurance Company of New York—that CKSMM represented within the past three years in matters unrelated to this chapter 11 case. More specifically, CKSMM secured a dismissal of the direct action lawsuit commenced against Fidelity where Fidelity had been named as a defendant alongside of the Debtor. To the best of my knowledge, this prior representation does not constitute an interest materially adverse to the Debtor or its estate with respect to the matters on which I am to be employed.

8. Unless identified on Schedule 2 or otherwise described herein, to the best of my knowledge, CKSMM does not currently represent and has not represented within the past three years the Additional Persons and Entities listed on Schedule 1 as of the date of the filing of the Application.

9. 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 CKSMM, insofar as I have been able to ascertain, currently represent or has represented, while at CKSMM, within the past three years the parties listed on Schedule 1, except as disclosed on Schedule 2 or otherwise described herein.

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

Dated: August 25, 2024

By: /s/ Kaye N. Courington
Kaye N. Courington

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

Schedule 2

CKSMM Disclosures

<u>Entity Searched</u>	<u>Entity or Individual with a Connection to CKSMM</u>	<u>Status</u>	<u>Nature of Representation</u>
Insurers			
Fidelity & Casualty Company	Fidelity Insurance Company of New York	Former Client	Unrelated Matters