

**HUNTON ANDREWS KURTH LLP**  
Joseph P. Rovira (admitted *pro hac vice*)  
Catherine A. Rankin (admitted *pro hac vice*)  
600 Travis Street, Suite 4200  
Houston, Texas 77002  
Telephone: (713) 220-4200

**HUNTON ANDREWS KURTH LLP**  
Tyler P. Brown (VSB No. 28072)  
Henry P. (Toby) Long, III (VSB No. 75134)  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219  
Telephone: (804) 788-8200

*Proposed Counsel for Debtor and Debtor in Possession*

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

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**In re:** : **Chapter 11**  
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**HOPEMAN BROTHERS, INC.,** : **Case No. 24-32428 (KLP)**  
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**Debtor.** :   
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**SUPPLEMENTAL DECLARATION OF RONALD VAN EPPS IN SUPPORT  
OF THE APPLICATION OF THE DEBTOR FOR ENTRY OF ORDER  
AUTHORIZING RETENTION AND EMPLOYMENT OF STOUT RISIUS ROSS, LLC  
AS FINANCIAL ADVISOR FOR THE DEBTOR AND DEBTOR IN  
POSSESSION EFFECTIVE AS OF THE PETITION DATE**

I, Ronald Van Epps, 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 Managing Director with Stout Risius Ross, LLC (“Stout”), an international consulting firm and proposed financial advisor to Hopeman Brothers, Inc. (the “Debtor”).

2. I submit this supplemental declaration (the “Supplemental Declaration”) to supplement my declaration (the “Original Declaration”), dated July 22, 2024, attached as Exhibit B to the *Application of the Debtor for Entry of an Order Authorizing the Retention and Employment of Stout Risius Ross, LLC as Financial Advisor for the Debtor and Debtor in*



*Possession Effective as of the Petition Date* [Docket No. 75] (the “Application”)<sup>1</sup>. 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 Stout 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 2 of the Original Declaration, I explained that Stout has searched its internal computer 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 and other parties in interest in this chapter 11 case. Furthermore, as set forth in paragraph 9 of the Original Declaration, I advised that a supplemental declaration would promptly be filed to the extent any new material relevant facts or relationships are discovered or arise.

5. To that end, I hereby submit this Supplemental Declaration to confirm that Stout has searched on its internal computer 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.

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<sup>1</sup> Capitalized terms used herein but not defined herein shall have the meaning ascribed to them in the Application.

6. Schedule 2 attached hereto identifies two (2) Additional Persons and Entities that Stout currently represents in matters unrelated to the Debtor and this chapter 11 case. To the best of my knowledge, these representations do not constitute an interest materially adverse to the Debtor or its estate with respect to the matters on which Stout is to be employed.

7. To the best of my knowledge, these business relationships do not constitute an interest materially adverse to the Debtor or its estate.

8. Unless identified on Schedule 2 or otherwise described herein, to the best of my knowledge, Stout does not currently represent and has not represented the parties 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 other Stout professional, insofar as I have been able to ascertain, currently represent or has represented, while at Stout, 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/ Ronald Van Epps  
Ronald Van Epps

**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**

**Stout Disclosures**

<u>Entity Searched</u>	<u>Entity or Individual with a Connection to Stout</u>	<u>Status</u>	<u>Nature of Representation</u>
<b>Official Committee of Unsecured Creditors' Professionals</b>			
Morgan Lewis & Bockius LLP	Morgan Lewis & Bockius LLP	Active Client	Unrelated Matters
<b>Insurers</b>			
Lexington Insurance Company	Lexington Insurance Company	Active Client	Unrelated Matters