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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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**SECOND 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
EFFECTIVE AS OF THE PETITION DATE**

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 (“Hunton” or the “Firm”), 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 second supplemental declaration (the “Second Supplemental Declaration”) to supplement (i) 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; and (ii) my initial supplemental declaration, dated August 25, 2024, titled the *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 Effective as of the Petition Date* [Docket No. 116] (the “First Supplemental Declaration” and, together with the Original Declaration, the “Prior Declarations”). This Second Supplemental Declaration is intended to supplement, and not replace, the Prior Declarations.

3. I am duly authorized to make this Second Supplemental Declaration on behalf of Hunton. Unless otherwise stated in this Second 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.

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

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 Second Supplemental Declaration to confirm that Hunton has searched on its electronic database for connections with an additional insurer that was not included on the Original Parties in Interest List, the Insurance Company of the State of Pennsylvania (“ICSP”).

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 ICSP 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 30, 2024

By: /s/ Tyler P. Brown
Tyler P. Brown