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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.** :
:
:
:
:

**SECOND 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 second supplemental declaration (the “Second Supplemental Declaration”) on behalf of Blank Rome. 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.

3. I submit this 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 (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; and (ii) my initial supplemental declaration, dated August 25, 2024, titled the *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* [Docket No. 117] (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.

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

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

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