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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 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 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 (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; and (ii) my initial supplemental declaration, dated August 25, 2024, titled the *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* [Docket No. 118] (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 CKSMM and to submit this Second 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.

¹ Capitalized terms used herein but not defined herein shall have the meaning 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 CKSMM 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 CKSMM, insofar as I have been able to ascertain, currently represent or has represented, while at CKSMM, 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.

Dated: August 30, 2024

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