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

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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**SECOND 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 second supplemental declaration (the “Second Supplemental Declaration”) to supplement my (i) 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”)¹; and (ii) my initial supplemental declaration, dated August 25, 2024, titled the *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 as Financial Advisor for the Debtor and Debtor in Possession Effective as of the Petition Date* [Docket No. 119] (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 Stout and to submit this Second Supplemental Declaration in support of the Application. Unless otherwise stated in this Second 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 Second Supplemental Declaration to confirm that Stout has searched on its internal computer database for connections with an additional insurer that

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

was not included on the Original Parties in Interest List, the Insurance Company of the State of Pennsylvania (“ICSP”).

6. 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, 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/ Ronald Van Epps
Ronald Van Epps