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Counsel for Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re: :
 : **Chapter 11**
 :
HOPEMAN BROTHERS, INC., : **Case No. 24-32428 (KLP)**
 :
 : **Debtor.** :
 :
 :
 :
 :
 :

**DEBTOR’S WITNESS AND EXHIBIT LIST FOR
MARCH 10, 2025 HEARING AT 11:00 A.M. (PREVAILING EASTERN TIME)**

The above-captioned debtor and debtor-in-possession (the “Debtor”) respectfully submits the following as its Witness and Exhibit List for the first-day hearing to be held on March 10, 2025, at 11:00 A.M. (prevailing Eastern Time) (the “Hearing”) as follows:

DEBTOR’S WITNESS LIST

1. The Debtor reserves the right to call the following witnesses at the Hearing:
 - a. Chris Lascell; and
 - b. Ron Van Epps

2. The Debtor reserves the right to examine or cross-examine any witness called by any other party.



3. The Debtor is prepared to seek the admission of any witness's declaration into evidence, proffer or forgo any direct testimony (reserving the right for re-direct), and make such witness available for questioning by the Court and any other party in interest, if any. The Debtor also reserves the right to call any witness, including a corporate representative, to authenticate or establish the foundation for any exhibit on the Debtor's list.

DEBTOR'S EXHIBIT LIST

4. The Debtor identifies the documents on the Exhibit List attached hereto as **Exhibit A** as those it may offer at the Hearing.

5. The Debtor reserves the right to supplement or amend its Exhibit List to (i) address documents produced by other parties recently or in the future; (ii) use and/or admit into evidence any exhibit identified on the exhibit list of any other party; and/or (iii) use and/or admit into evidence any exhibit used for impeachment purposes.

6. In addition to the documents and exhibits identified on **Exhibit A**, the Debtor reserves the right to offer or otherwise use at the Hearing: (i) documents or exhibits identified on the exhibit list of any other party or party-in-interest; (ii) pleadings filed by the parties in this matter; (iii) additional exhibits reasonably necessary to respond to issues presented during the Hearing; and (iv) charts, graphs, timelines, enlargements, models, or other demonstrative exhibits.

7. By listing an exhibit on this list, the Debtor does not concede that any particular exhibit is admissible or that it is admissible for all purposes. The Debtor reserves the right to object to admission of any document. The Debtor reserves the right to amend or supplement its exhibit list, or to add or subtract exhibits, prior to the conclusion of the Hearing. The Debtor also reserves the right to request the Court to take judicial notice of any exhibits as necessary.

Dated: March 7, 2025
Richmond, Virginia

/s/ Henry P. (Toby) Long, III

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EXHIBIT A

DEBTOR’S HEARING EXHIBIT LIST

Hearing Date: March 10, 2025

EXHIBIT NO.	DOCUMENT DESCRIPTION	ADMITTED
Debtor’s Ex. 1	<i>Declaration of Christopher Lascell in Support of Chapter 11 Petition and First Day Pleadings of Hopeman Brothers, Inc.</i> [Docket No. 8].	
Debtor’s Ex. 2	<p>The September 10, 2024 Hearing Transcript (the “<u>September 10 Transcript</u>”) on Motion of the Debtor for Entry of Interim and Final Order Extending the Automatic Stay to Stay Asbestos-Related Actions Against Non-Debtor Defendants, including (“<u>Motion to Stay</u>”), 72:3-170:13, including each of the Debtor’s exhibits that was admitted into evidence at the September 10 hearing in support of the Motion to Stay.</p> <p>The Debtor will provide the Court with redacted and unredacted copies of the September 10 Transcript, and will comply with the Confidentiality Agreement and Protective Order [Docket No. 206] to the extent the September 10 Transcript must be discussed in open court.</p>	
Debtor’s Ex. 3	<i>Settlement Term Sheet for § 524(g) Plan of Hopeman Brothers, Inc.</i> – Exhibit B to Motion for Expedited Status Conference [Docket No. 609]	
	Any written direct testimony filed by witnesses the Debtor will call at the Hearing.	
	Any documents necessary for rebuttal.	
	Any exhibit designated by any other party.	