

STEPTOE LLP

Joshua R. Taylor (VSB No. 45919)
Catherine D. Cockerham (admitted *pro hac vice*)
Jefferson Klocke (admitted *pro hac vice*)
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036
Telephone: (202) 429-3000
jrtaylor@steptoe.com
ccockerham@steptoe.com
jklocke@steptoe.com

*Counsel for The Travelers Indemnity Company,
Travelers Casualty and Surety Company, formerly
known as The Aetna Casualty and Surety Company,
and St. Paul Fire and Marine Insurance Company*

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

In re:

HOPEMAN BROTHERS, INC.,

Debtor.

Chapter 11

Case No. 24-32428 (KLP)

**TRAVELERS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING TRAVELERS
TO FILE UNDER SEAL ITS UNREDACTED PLAN OBJECTION AND TO FILE
PUBLICLY A REDACTED VERSION OF ITS PLAN OBJECTION**

The Travelers Indemnity Company, Travelers Casualty and Surety Company, formerly known as The Aetna Casualty and Surety Company; and St. Paul Fire and Marine Insurance Company (together, "Travelers") hereby files this motion (the "Motion") under 11 U.S.C. §§ 105(a) and 107(b)(1), Fed. R. Bankr. P. 9018, and the Order (I) Deeming Debtor's Insurance Related Agreements and Other Confidential Documents as Governed by Protective Order; and



(II) Granting Related Relief [Dkt. 260¹] (the “Protective Order”) for entry of an order in the form of the attached **Exhibit A** (the “Proposed Order”) (1) authorizing Travelers to file under seal an unredacted copy of the Objection of The Travelers Indemnity Company, Travelers Casualty and Surety Company, and St. Paul Fire and Marine Insurance Company to (I) Amended Plan of Reorganization of Hopeman Brothers, Inc. under Chapter 11 of the Bankruptcy Code [Dkt. 766] and (II) the Disclosure Statement with Respect to the Amended Plan of Reorganization of Hopeman Brothers, Inc. under Chapter 11 of the Bankruptcy Code [Dkt. 767] (the “Objection”) and any exhibit thereto subject to the Protective Order (defined below), including the Travelers Confidential Agreements (defined below) (the “Exhibits”); (2) authorizing Travelers to file a redacted version of its Objection; (3) directing that the unredacted and unsealed Objection and Exhibits remain under seal and confidential and not be made available to any entity other than the Court and counsel to the Debtor, counsel to the Committee, and counsel to the Future Claims Representative; and (4) providing that in the confirmation hearing that the Court may determine at that time whether any portion of the hearing pertaining to the confidential information that is the subject of this Motion be conducted *in camera*.

BASIS FOR REQUESTED RELIEF

1. On September 30, 2024, the Court entered an Order [Dkt. 260] approving a “Confidentiality Agreement and Protective Order” (attached at Dkt. 225) (“Protective Order”), which expressly governs the production, review, disclosure, and handling of confidential agreements executed prepetition between Hopeman Brothers, Inc. (“Hopeman”) and Hopeman’s insurers, including Travelers, along with any documents and/or correspondence related directly

¹ The Order entered at Dkt. 260 incorporated the Confidentiality Agreement and Protective Order attached as Exhibit B to the Motion of the Debtor for Entry of an Order (I) Deeming Debtor’s Insurance Related Agreements and Other Confidential Documents as Governed by Protective Order; and (II) Granting Related Relief, which can be found at Dkt. 225.

such agreements and designated as “Confidential.” *See* Dkt. 260 & 225. Prepetition Hopeman and Travelers entered into such agreements, including (i) an Agreement Among Hopeman Brothers, Inc., The Travelers Indemnity Company, Travelers Casualty and Surety Company, and St. Paul Fire and Marine Insurance, dated July 22, 2005 (“2005 Agreement”), which relates to (ii) Agreement Concerning Asbestos-Related Claims, dated June 19, 1985 (“Wellington Agreement” and collectively with the 2005 Agreement, the “Travelers Confidential Agreements”), which contain confidential terms and provisions and are subject to the Protective Order.

2. The Protective Order requires that any Protected Material be filed under seal. *See* Dkt. 225, Ex. B at § 4.3 (“A Party may not file in the public record any Protected Material. A Party that seeks to file any Protected Material with the Bankruptcy Court must file such Protected Material under seal in accordance with the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Rules, the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia, and the individual practice rules of the Bankruptcy Court.”).

3. Travelers’ Objection quotes relevant provisions from the Travelers Confidential Agreements, which will be attached to the Objection and are considered “Protected Material” under the Protective Order. Thus, consistent with the requirements in the Protective Order, Travelers respectfully seeks permission to file the unredacted Objection and the Travelers Confidential Agreements under seal and to file a redacted version of the Objection. *See* Dkt. 225, Ex. B at § 4.3.

4. Contemporaneously with this Motion, Travelers filed the redacted Objection with this Court and sent the unredacted Objection and Travelers Confidential Agreement to this Court’s chambers.

5. Sufficient cause exists for this Court to grant the relief requested in this Motion. As explained above, the Objection quote and attach the Travelers Confidential Agreements, which is designated as Protected Material under the Protective Order. The Objection thus must be filed with redactions and the Travelers Confidential Agreements must be filed under seal.

NOTICE

6. Notice of this Motion will be given pursuant to Local Rule 1075-1 and the procedures set forth in Article II of the “Procedures for Complex Cases in the Eastern District of Virginia.” Travelers submits that, in light of the nature of the relief requested, no other further notice need be given.

NO PREVIOUS REQUEST

7. No previous request for the relief sought herein has been made by Travelers to this or any court.

WHEREFORE, Travelers respectfully requests that the Court enter the Proposed Order granting the relief requested herein.

Dated: July 7, 2025

STEPTOE LLP

/s/ Joshua R. Taylor

Joshua R. Taylor (VSB No. 45919)

Catherine D. Cockerham (admitted *pro hac vice*)

Jefferson Klocke (admitted *pro hac vice*)

Step toe LLP

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Certificate of Service

I hereby certify that on this date I submitted the foregoing through the Court's CM/ECF system, causing a true and correct copy thereof to be electronically delivered and served via that system on all parties receiving electronic notices in these Chapter 11 cases.

Dated: July 7, 2025

STEPTOE LLP

/s/ Joshua R. Taylor

Joshua R. Taylor

Steptoe LLP

1330 Connecticut Avenue, N.W.

Washington, D.C. 20036

Telephone: (202) 429-3000

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Exhibit A

Proposed Order

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In re:

HOPEMAN BROTHERS, INC.,

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**ORDER GRANTING TRAVELERS' MOTION FOR ENTRY OF
AN ORDER AUTHORIZING TRAVELERS TO FILE UNDER
SEAL ITS UNREDACTED PLAN OBJECTION AND TO FILE
PUBLICLY A REDACTED VERSION OF ITS PLAN OBJECTION**

Upon the motion (the "Motion"²) of The Travelers Indemnity Company; Travelers Casualty and Surety Company, formerly known as The Aetna Casualty and Surety Company; and St. Paul Fire and Marine Insurance Company (together, "Travelers") for entry of an order, under 11 U.S.C. §§ 105(a) and 107(b)(1), Fed. R. Bankr. P. 9018, and the Protective Order, for entry of an order: (1) authorizing Travelers to file under seal its unredacted objections to the

² Capitalized terms used but not otherwise defined in this Order have the meaning ascribed to them in the Motion.

proposed plan (the “Objection”) and any exhibit subject to the Protective Order, including the Travelers Confidential Agreements (the “Exhibits”); (2) authorizing Travelers to file a redacted version of its Objection; (3) directing that the unredacted and unsealed Objection and Exhibits remain under seal and confidential and not be made available to any entity other than the Court and counsel to the Debtor, counsel to the Committee, and counsel to the Future Claims Representative; and (4) providing that in the confirmation hearing that the Court may determine at that time whether any portion of the hearing pertaining to the confidential information that is the subject of this Motion be conducted *in camera*; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that the venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the parties in interest; and the Court having found that Travelers’ notice of the Motion was appropriate under the circumstances, and no other notice need be provided; and the Court having reviewed and considered the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth in this Order.
2. Travelers is authorized to file the unredacted Objection and Exhibits, including the Travelers Confidential Agreements, under seal, which seal shall be maintained under 11 U.S.C. 107(c).

3. Travelers is authorized to publicly file the Objection with redactions, contemporaneously with the transmittal of the unredacted Objection and Exhibits to this Court's chambers.

4. The unredacted and unsealed Objection and Exhibit shall not be disseminated to anyone other than the Court and counsel to the Debtors.

5. Any party receiving an unredacted copy of the Objection and/or Exhibit shall, at all times, keep the information contained therein strictly confidential and shall not disclose such information to any party whatsoever.

6. The terms and conditions of this Order shall be effective immediately and enforceable upon its entry.

7. The requirement under Local Rule 9013-1(G) to file a memorandum of law in connection with the Motion is hereby waived to the extent applicable.

8. This Court shall retain jurisdiction with respect to all matters arising out of or related to the interpretation or enforcement of this Order.

Dated: _____, 2025
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: _____

WE ASK FOR THIS:

/s/ Joshua R. Taylor
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**CERTIFICATION OF ENDORSEMENT
UNDER LOCAL BANKRUPTCY RULE 9022-1(C)**

I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Joshua R. Taylor