

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)

NOTICE OF MOTION AND NOTICE OF HEARING

PLEASE TAKE NOTICE that on July 7, 2025, 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”) filed the following motion with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond District (the “Court”): Travelers’ Motion for Entry of an Order Authorizing Travelers to File under Seal Its Unredacted Plan Objections and to File Publicly a Redacted Version of Its Plan Objections (the “Motion”), Dkt. 950.

PLEASE TAKE FURTHER NOTICE that copies of the Motion may be obtained at no charge at <https://www.veritaglobal.net/hopement> or for a fee at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motions carefully and discuss them with your attorney, if you have one in the Chapter 11 case. If you do not have an attorney, you may wish to consult one.



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PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the Motions, or if you want the Court to consider your view on the Motion, then by July 11, 2025 (the “Response Deadline”) you or your attorney must:

- ☒ File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will receive it on or before the Response Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and issue an order granting the requested relief without further notice or hearing.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written response on Travelers so that the response is received on or before the Response Deadline.

- ☒ Attend the hearing before the Honorable Keith L. Phillips, United States Bankruptcy Judge, at **10:00 a.m. (prevailing Eastern Time) on July 14, 2025**, in Courtroom 5100 of the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, 5th Floor, Richmond, Virginia 23219.

PLEASE TAKE FURTHER NOTICE that you should consult the Case Management Procedures before filing any written response to the Motion.

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*)

Steptoe LLP

1330 Connecticut Avenue, N.W.

Washington, D.C. 20036

Telephone: (202) 429-3000

jrtaylor@steptoe.com

ccockerham@steptoe.com

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

Certificate of Service

I HEREBY CERTIFY that, on July 7, 2025, a true and correct copy of the foregoing Notice of Motion and Notice of Hearing was served on all parties receiving electronic notice through the Court's ECF notification system, and served on the following via electronic mail and U.S. Mail:

Counsel for Hopeman Brothers, Inc.

Hunton Andrews Kurth LLP
Joseph P. Rovira
Catherine A. Rankin
600 Travis Street, Suite 4200
Houston, TX 77002

and

Tyler P. Brown
Henry P. (Toby) Long
III Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219

US Trustee for the Eastern District of Virginia

Attn: Kathryn R. Montgomery
701 East Broad Street, Suite 4304
Richmond, VA 23219

Counsel for the Official Committee of Unsecured Creditors

Caplin & Drysdale, Chartered
Kevin C. Maclay
Todd E. Phillips
Jeffrey A. Liesemer
Kevin M. Davis
Nathaniel R. Miller 1
200 New Hampshire Avenue NW, 8th Floor
Washington, DC 20036

Counsel for Future Claimants' Representative

Campbell & Levine, LLC
David B. Salzman
Kathryn L. Harrison
310 Grant Street, Suite 1700
Pittsburgh, PA 15219

I FURTHER CERTIFY that on July 7, 2025, the foregoing Notice of Motion and Notice of Hearing was served via Electronic Mail on the service list attached hereto as Exhibit A and via First Class Mail on the service list attached hereto as Exhibit B.

/s/ Joshua R. Taylor

Joshua R. Taylor

Exhibit A to Certificate of Service

Description	CreditorName	CreditorNoticeName	Email
Top 20 law firms with unpaid settlement amounts and pending claims	Baron & Budd, P.C.	Ann Harper	aharper@baronbudd.com
Top 20 law firms with pending claims	Bodie Dolina Friddell Grenzer	James Smith	jtsmith@bodie-law.com
Counsel for the Chubb Settling Insurers	Brandywine Holdings	Shelby Mattioli, SVP Direct Claims	Shelby.Mattioli@brandywineholdings.com
Counsel for the Chubb Settling Insurers	Brandywine Holdings	Sandra Hourahan	Sandra.hourahan@brandywineholdings.com
Top 20 law firms with unpaid settlement amounts and pending claims	Brayton Purcell LLP	Alan Brayton	abrayton@braytonlaw.com
Top 20 law firms with unpaid settlement amounts and pending claims	Brookman Rosenberg Brown & Sandler	Larry Brown	lbrown@brbs.com
Proposed Counsel to Marla Rosoff Eskin, Future Claimants' Representative	Campbell & Levine, LLC	David B. Salzman, Kathryn L. Harrison	dsalzman@camlev.com; kharrison@camlev.com
Counsel for the Official Committee of Unsecured Creditors	Caplin & Drysdale, Chartered	Kevin C. Maclay, Todd E. Phillips, Jeffrey A. Liesemer, Kevin M. Davis, Nathaniel R. Miller	kmaclay@capdale.com; tphillips@capdale.com; jliesemer@capdale.com; kdavis@capdale.com; nmiller@capdale.com
Counsel for the Official Committee of Unsecured Creditors	Caplin & Drysdale, Chartered	Cecilia Guerrero	cguerrero@capdale.com
Counsel to Liberty Mutual Insurance Company	Choate, Hall & Stewart LLP	Douglas R. Gooding, Jonathan D. Marshall, Kevin J. Finnerty	dgooding@choate.com; jmarshall@choate.com; kfinnerty@choate.com
Top 20 law firms with unpaid settlement amounts	Goldberg Persky White P.C.	Theodore Goldberg	tgoldberg@gdldlaw.com
Local Counsel for Janet Rivet, Kayla Rivet, Maxine Becky Polkey Ragusa, Valerie Ann Ragusa Primeaux, Stephanie Jean Ragusa Connors, Erica Dandry Constanza and Monica Dandry Hallner	Hirschler Fleischer, P.C.	Robert S. Westermann, Kollin G. Bender	rwestermann@hirschlerlaw.com; kbender@hirschlerlaw.com
Local Counsel for Janet Rivet, Kayla Rivet, Maxine Becky Polkey Ragusa, Valerie Ann Ragusa Primeaux, Stephanie Jean Ragusa Connors, Erica Dandry Constanza and Monica Dandry Hallner	Hirschler Fleischer, P.C.	Robert S. Westermann, Kollin G. Bender	rwestermann@hirschlerlaw.com; kbender@hirschlerlaw.com
Attorneys for the Debtor and Debtor in Possession	Hunton Andrews Kurth LLP	Tyler P. Brown, Henry P. (Toby) Long, III	tpbrown@HuntonAK.com; hlong@HuntonAK.com

Description	CreditorName	CreditorNoticeName	Email
Attorneys for the Debtor and Debtor in Possession	Hunton Andrews Kurth LLP	Joseph P. Rovira, Catherine A. Rankin	josephrovira@HuntonAK.com; crankin@HuntonAK.com
IRS	Internal Revenue Service	Attn Susanne Larson	SBSE.Insolvency.Balt@irs.gov
Top 20 law firms with pending claims	Irwin Fritchie Urquhart & Moore	Gus Fritchie	gfritchie@irwinllc.com
Counsel to Liberty Mutual Insurance Company	Kaufman & Canoles, P.C.	Douglas M. Foley	dmfoley@kaufcan.com
Claims Agent	KCC dba Verita	Jeffrey R. Miller	jmillier@veritaglobal.com
Top 20 law firms with unpaid settlement amounts and pending claims	Law Office of Phillip C. Hoffman	Phillip Hoffman	phil@pchlawfirm.com
Top 20 law firms with unpaid settlement amounts	Law Offices of Alwyn H. Luckey	Alwyn Luckey	reception@alwynluckey.com
Top 20 law firms with unpaid settlement amounts	Law Offices of G. Patterson Keahey, P.C.	G. Patterson Keahey, Jr.	info@mesohelp.com
Top 20 law firms with pending claims	Law Offices of Paul A. Weykamp	Paul Weykamp	pweykamp@weykamlaw.net
Top 20 law firms with pending claims	Lomax Law Firm	Scott Nelson	contact.us@thelomaxlawfirm.com
Counsel for Huntington Ingalls Industries, Inc.	McGuireWoods LLP	Dion W. Hayes, Sarah B. Boehm, Connor W. Symons, K. Elizabeth Sieg	dhayes@mcguirewoods.com; sboehm@mcguirewoods.com; csymons@mcguirewoods.com; bsieg@mcguirewoods.com
Top 20 law firms with unpaid settlement amounts and pending claims	Peter Angelos Law	James Zavakos	jzavakos@lawpga.com
Top 20 law firms with pending claims	Pourciau Law Firm	Damon Pourciau	drp@pourciaulaw.com
Top 20 law firms with unpaid settlement amounts	Provost Umphrey Law Firm, L.L.P.	Brian Blevins, Jr., Colin Moore	dfelps@provostumphrey.com
Proposed Counsel to Marla Rosoff Eskin, Future Claimants' Representative	Reaves PLLC	Michael G. Wilson	mike.wilson@reavescoley.com
Lead Counsel for Janet Rivet, Kayla Rivet, Maxine Becky Polkey Ragusa, Valerie Ann Ragusa Primeaux, Stephanie Jean Ragusa Connors, Erica Dandry Constanza and Monica Dandry Hallner	Roussel & Clement	Gerolyn Roussel, Jonathan B. Clement, Benjamin P. Dinehart	rcfirm@roussellandclement.com
Top 20 law firms with unpaid settlement amounts	Shein Law	Peter Shein	bshein@sheinlaw.com
Top 20 law firms with pending claims	Shrader & Associates, L.L.P.	Ross D. Stomel II	ross@shraderlaw.com
Top 20 law firms with unpaid settlement amounts	Simmons Hanly Conroy	John Simmons	john@simmonsfirm.com
Top 20 law firms with unpaid settlement amounts and pending claims	Stephen L. Shackelford, PLLC	Stephen Shackelford	steve@shackelfordlawoffice.com

Description	CreditorName	CreditorNoticeName	Email
Top 20 law firms with unpaid settlement amounts and pending claims	The Gori Law Firm	Christopher Layloff	clayloff@gorilaw.com
Counsel for the Chubb Settling Insurers, Century Indemnity Company, Westchester Fire Insurance Company, Continental Casualty Company, and General Reinsurance Corporation	Troutman Pepper Locke LLP	Leslie A. Davis and Michael T. Carolan	Leslie.davis@troutman.com
Counsel to Century Indemnity Company, Westchester Fire Insurance Company, Continental Casualty Company, and General Reinsurance Corporation	Troutman Pepper Locke LLP	Dabney J. Carr, IV	dabney.carr@troutman.com
Office of the US Trustee for the Eastern District of Virginia	US Trustee for the Eastern District of Virginia	Attn: Kathryn R. Montgomery	kathryn.montgomery@usdoj.gov
Virginia Attorney General	Virginia Attorney General	Attn Bankruptcy Department	mailoag@oag.state.va.us
Top 20 law firms with unpaid settlement amounts	Weitz & Luxenberg	Perry Weitz	info@weitzlux.com
Counsel for the Chubb Settling Insurers and Certain Settling Insurers, Century Indemnity Company, Westchester Fire Insurance Company, Continental Casualty Company, and General Reinsurance Corporation	White and Williams LLP	Patricia B. Santelle	santellep@whiteandwilliams.com
Top 20 law firms with pending claims	Womble Bond Dickinson	Theodore F. Roberts	Ted.Roberts@wbd-us.com
Hartford Accident and Indemnity Company, First State Insurance Company	Ruggeri Parks Weinberg LLP	James W. Burke, Joshua D. Weinberg	jweinberg@ruggerilaw.com; jburke@ruggerilaw.com

Exhibit B to Certificate of Service

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Top 20 law firms with pending claims	Ashcraft & Gerel	Dominick Callela	120 E. Baltimore St., Ste. 1802		Baltimore	MD	21202
Top 20 law firms with unpaid settlement amounts and pending claims	Cumbest, Cumbest, Hunter & McCormick, P.A.	David McCormick	729 Watts Ave	PO Box 1287	Pascagoula	MS	39567
Official Committee of Unsecured Creditors	Darrell Kitchen	Lisa Nathanson Busch, Esquire	Simmons Hanly Conroy	112 Madison Avenue, 7th Floor	New York	NY	10016
Official Committee of Unsecured Creditors	Donald M. Hoffman, Jr	Stephen Austin, Esquire	Stephen J. Austin, LLC	1 Galleria Blvd. Ste. 1900	Metairie	LA	70001
Top 20 law firms with unpaid settlement amounts	Ferrell Law Group	James Ferrell	6226 Washington Ave.	Ste 200	Houston	TX	77007
Top 20 law firms with pending claims	Goodman, Meagher & Enoch, LLP	John Amato IV	One Charles Center	100 N. Charles St., Ste. 1610	Baltimore	MD	21201
Debtors	Hopeman Brothers, Inc	Christopher Lascell	6 Auburn Ct, Unit 3		Brookline	MA	02446
IRS	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346		Philadelphia	PA	19101-7346
IRS	Internal Revenue Service	Centralized Insolvency Operation	2970 Market St		Philadelphia	PA	19104
Top 20 law firms with pending claims	Law Offices of Clifford Cuniff	Clifford Cuniff	1070 New River Inlet Rd		N Topsail Bch	NC	28460-9248
Top 20 law firms with pending claims	Law Offices of Peter T. Nicholl	Peter Nicholl	36 S. Charles St., Ste. 1700		Baltimore	MD	21201
Official Committee of Unsecured Creditors	Melissa Beerman	J. Bradley Smith, Esquire	Dean Omar Branham Shirley, LLP	302 N. Market Street, Ste. 300	Dallas	TX	75202
Official Committee of Unsecured Creditors	Nancy McComas-Doiron	Carol A. Hastings, Esquire	Peter Angelos Law	100 N. Charles Street, 20th Floor	Baltimore	MD	21201
Top 20 law firms with pending claims	Nass Cancelliere Brenner	David Brenner	1500 JFK Blvd. (Two Penn Center)	Suite 404	Philadelphia	PA	19102
Top 20 law firms with pending claims	Patten, Wornom, Hatten & Diamonstein, LC	Donald Patten	12350 Jefferson Ave., Ste. 300		Newport News	VA	23602
Counsel for the Chubb Settling Insurers and Certain Settling Insurers	Resolute Management Inc.	Senior Vice-President, Claims	125 High Street	Suite 1010	Boston	MA	02110
Top 20 law firms with unpaid settlement amounts	Scott & Scott, LTD	Tom Scott	PO Box 2009		Jacksonville	MS	39215

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Official Committee of Unsecured Creditors	Veronica Miller	Chris McKean, Esquire	MRHFM Law Firm	1015 Locust Street, Ste. 1200	St. Louis	MO	63101