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

**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

:  
 : **Chapter 11**  
 :  
 : **Case No. 24-32428 (KLP)**  
 :  
 :  
 :  
 :

**PLAN PROPONENTS' WITNESS AND  
 EXHIBIT LIST FOR AUGUST 25, 2025 HEARING**



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The above-captioned debtor and debtor-in-possession (the “Debtor”) and the Official Committee of Unsecured Creditors (the “Committee”; together with the Debtor, the “Plan Proponents”) respectfully submit the following as their Witness and Exhibit List for the hearing scheduled for August 25, 2025, at 10:00 A.M. (prevailing Eastern Time) (the “Hearing”):

**PLAN PROPONENTS’ WITNESS LIST**

1. The Plan Proponents reserve the right to call the following witnesses at the Hearing:
  - a. Chris Lascell;
  - b. Ron Van Epps;
  - c. Conor Tully; and
  - d. Jeffrey Miller (Debtor’s Claims and Noticing Agent from Verita Global LLC, if necessary, concerning the Voting Certification)
2. The Plan Proponents reserve the right to examine or cross-examine any witness called by any other party.
3. The Plan Proponents are 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 Plan Proponents also reserves the right to call any witness, including a corporate representative, to authenticate or establish the foundation for any exhibit on the Plan Proponents’ list.

**PLAN PROPONENTS’ EXHIBIT LIST**

4. The Plan Proponents identify the documents on the Exhibit List attached hereto as Exhibit A as those they may offer at the Hearing.

5. The Plan Proponents reserve the right to supplement or amend their 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 Plan Proponents reserve 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 Plan Proponents do not concede that any particular exhibit is admissible or that it is admissible for all purposes. The Plan Proponents reserve the right to object to admission of any document. The Plan Proponents reserve the right to amend or supplement their exhibit list, or to add or subtract exhibits, prior to the conclusion of the Hearing. The Plan Proponents also reserve the right to request the Court to take judicial notice of any exhibits as necessary.

*[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]*

Dated: August 22, 2025  
Richmond, Virginia

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

Tyler P. Brown (VSB No. 28072)

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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors*

**EXHIBIT A**

**Plan Proponents Exhibit List**

<b>EXHIBIT NO.</b>	<b>DOCUMENT DESCRIPTION</b>	<b>ADMITTED</b>
<b>Plan Proponents’ Ex. 1</b>	Asbestos Trust Agreement – Exhibit A to the <i>Notice of Filing of Second Plan Supplement Related to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 1143] (as may be amended, modified or supplemented in advance of the Hearing)	
<b>Plan Proponents’ Ex. 2</b>	Asbestos Trust Distribution Procedures – Exhibit B to the <i>Notice of Filing of Second Plan Supplement Related to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 1143] (as may be amended, modified or supplemented in advance of the Hearing)	
<b>Plan Proponents’ Ex. 3</b>	Amended By-Laws of Reorganized Hopeman – Exhibit C to the <i>Notice of Filing of Plan Supplement Related to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 853]	
<b>Plan Proponents’ Ex. 4</b>	Amended Certificate of Incorporation – Exhibit D to the <i>Notice of Filing of Plan Supplement Related to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 853]	
<b>Plan Proponents’ Ex. 5</b>	Asbestos Personal Injury Claimant Release – Exhibit E to the <i>Notice of Filing of Plan Supplement Related to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 853]	
<b>Plan Proponents’ Ex. 6</b>	Restructuring Transaction – Exhibit F to the <i>Notice of Filing of Plan Supplement Related to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 853]	
<b>Plan Proponents’ Ex. 7</b>	List of Vendor Released Parties – Exhibit G to the <i>Notice of Filing of Plan Supplement Related to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 853]	
<b>Plan Proponents’ Ex. 8</b>	Asbestos Insurance Policies – Exhibit H to the <i>Notice of Filing of Plan Supplement Related to Amended Plan</i>	

EXHIBIT NO.	DOCUMENT DESCRIPTION	ADMITTED
	<i>of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 853]	
<b>Plan Proponents’ Ex. 9</b>	Reorganized Hopeman Projections – Exhibit I to the <i>Notice of Filing of Plan Supplement Related to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 853]	
<b>Plan Proponents’ Ex. 10</b>	Schedule of Non-Exclusive Causes of Action Transferred to the Asbestos Trust – Exhibit J to the <i>Notice of Filing of Second Plan Supplement Related to Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 1143]	
<b>Plan Proponents’ Ex. 11</b>	Liquidation Analysis – Exhibit B to the <i>Disclosure Statement with Respect to the Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 767]	
<b>Plan Proponents’ Ex. 12</b>	<i>Modified Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 1141] (as may be amended, modified or supplemented in advance of the Hearing)	
<b>Plan Proponents’ Ex. 13</b>	<i>Disclosure Statement with Respect to the Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code</i> [Docket No. 767]	
<b>Plan Proponents’ Ex. 14</b>	Voting Certification [Docket No. 1077]	
<b>Plan Proponents’ Ex. 15</b>	<i>Declaration of Christopher Lascell in Support of Plan of Reorganization</i> [Docket No. 1115]	
<b>Plan Proponents’ Ex. 16</b>	<i>Declaration of Ronald Van Epps in Support of Plan of Reorganization</i> [Docket No. 1116]	
<b>Plan Proponents’ Ex. 17</b>	<i>Declaration of Conor P. Tully in Support of Plan of Reorganization</i> [Docket No. 1122]	
<b>Plan Proponents’ Ex. 18</b>	Hopeman Insurance Coverage Map [Debtor’s Exhibit 1 admitted into evidence at the December 16, 2024 Hearing]	
	Any written direct testimony filed by witnesses the Plan Proponents will call at the Hearing.	
	Any documents necessary for rebuttal.	
	Any exhibit designated by any other party.	