

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 FILING OF TRAVELERS EXHIBIT W

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 (collectively, “Travelers”) hereby submit this Notice, as ordered by the Court (*see* Dkt. 1168) regarding Travelers’ deposition designations that were admitted into evidence as Travelers Exhibit W on August 26, 2025 at the Confirmation Hearing.

On August 24, 2025, the Certain Insurers’ List of Witnesses and Exhibits for Hearing on Final Approval of Disclosure Statement and Confirmation of Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code was filed (“Exhibit List”). *See*



24324282508280000000000002

Dkt. 1159. The Exhibit List included Travelers Exhibit W, which was comprised of certain Travelers' deposition designations, as set forth on Appendix B, and related deposition exhibits. During the Confirmation Hearing held on August 25 and 26, 2025, the Court admitted Travelers Exhibit W into evidence based on an agreed upon revised list of the deposition designations. The revised list of designation depositions included in Travelers' Exhibit W, is set forth below:

From (Page:Line)	To (Page:Line)
8:3	9:21
134:10	136:17
141:4	142:8
144:1	144:4
145:10	148:6
148:23	148:25
149:7	149:10
151:22	152:7
153:10	154:6
156:4	156:7
156:9	156:9
156:11	156:13
156:17	156:25
157:1	157:3
157:5	157:10
157:13	157:13
158:4	159:17
159:22	159:25
163:18	164:8
166:5	166:15
166:18	166:19
170:19	170:22
172:3	172:21
179:12	180:22
180:24	181:18
183:2	184:2
186:17	186:21
186:25	187:1
188:18	189:14
189:16	190:19
190:23	191:12

Attached hereto is the revised and admitted version of Travelers Exhibit W, the deposition designations of Christopher Lascell, serving as the Fed. R. Civ. P. 30(b)(6) designee of Hopeman Brothers, Inc., including the deposition exhibits referenced within the deposition transcript excerpts: Deposition Exhibit 107 (the Amended Plan, Dkt. 766); Deposition Exhibit 109 (Plan Supplement, Dkt. 853); Deposition Exhibit 127 (Travelers' Notice of Rule 30(b)(6) Deposition, also at Travelers Ex. AB); and Deposition Exhibit 131 (Debtor's Responses to Travelers' Interrogatories, also at Travelers Ex. AA, Dkt. 944-25).

Dated: August 28, 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

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*