

TROUTMAN PEPPER LOCKE LLP

Dabney J. Carr (VSB No. 28679)
James K. Donaldson (VSB No. 80307)
1001 Haxall Point, Suite 1500
Richmond, VA 23219
Telephone: (804) 697-1200

WHITE AND WILLIAMS LLP

Patricia B. Santelle (admitted *pro hac vice*)
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103
Telephone: (215) 864-7000

Leslie A. Davis (admitted *pro hac vice*)
Michael T. Carolan (admitted *pro hac vice*)
401 9th Street, NW
Washington, DC 20004
Telephone: (202) 274-2950

*Counsel for Century Indemnity Company and
Westchester Fire 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)

**THE CHUBB INSURERS' RESPONSE TO THE PLAN PROPONENTS' JOINT
STATEMENT IN RESPONSE TO THE PROPOSED FINDINGS OF FACT AND
CONCLUSIONS OF LAW REGARDING CONFIRMATION OF THE MODIFIED
AMENDED PLAN OF REORGANIZATION OF HOPEMAN BROTHERS, INC.**

Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America, and Westchester Fire Insurance Company (on its own behalf and for policies issued by or novated to Westchester Fire Insurance Company; collectively, the "Chubb Insurers"), hereby respond to the Joint Statement of Plan Proponents in Response to the Proposed Findings of Fact and Conclusions of Law Regarding Confirmation of the Modified Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code and Approving Adequacy of the Disclosure Statement (the "Plan Proponents' Statement"). (ECF No. 1309.)



The Plan Proponents' Statement attaches proposed revisions to the Plan, the Asbestos Trust Agreement, and the proposed Confirmation Order that are intended to "conform those documents to the Proposed Findings."¹ (*Id.*, ¶ 2 and Ex. A.) The proposed revisions set forth in the Plan Proponents' Statement do not, however, pertain to or address any of the issues raised in the Chubb Insurers' Objection to the Proposed Findings.² For the reasons stated in the Chubb Insurers' Objection, the Plan fails to meet the requirements of 11 U.S.C. § 1129 and 11 U.S.C. § 524(g) even if it is revised as proposed in the Plan Proponents' Statement, and confirmation of the Plan should be denied even if Plan Proponents' proposed changes are made.

Further, on December 12, 2025, Travelers filed with the Court its Response To The Plan Proponents' Statement (the "Travelers' Response"). Except with respect to Travelers' arguments that are unique to the Travelers' insurance policies, the Chubb Insurers join in support of the arguments asserted in the Travelers' Response, including §§ II.A, II.B, and II.C of the Travelers' Response. (ECF No. 1330.)

¹ Capitalized terms have the meaning ascribed to them in the Plan Proponents' Statement.

² See Chubb Insurers' Objection to Proposed Findings of Fact and Conclusions of Law Regarding Confirmation of the Modified Amended Plan of Reorganization of Hopeman Brothers, Inc. Under Chapter 11 of the Bankruptcy Code and Approving Adequacy of the Disclosure Statement (the "Chubb Insurers' Objection"). (ECF No. 1314.)

DATED: December 12, 2025

Respectfully submitted,

/s/ James Donaldson

Dabney J. Carr (VSB No. 28679)
James K. Donaldson (VSB No. 80307)
Troutman Pepper Locke LLP
1001 Haxall Pt.
Richmond, VA 23219
Telephone: (804) 697-1200
dabney.carr@troutman.com
jed.donaldson@troutman.com

Leslie A. Davis (admitted *pro hac vice*)
Michael T. Carolan (admitted *pro hac vice*)
Troutman Pepper Locke LLP
401 9th Street, NW
Washington, DC 20004
Telephone: (202) 274-2958
leslie.davis@troutman.com
michael.carolan@troutman.com

-and-

Patricia B. Santelle (admitted *pro hac vice*)
White and Williams LLP
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103
Telephone: (215) 864-7000
santellep@whiteandwilliams.com

*Counsel for Century Indemnity Company
and Westchester Fire Insurance Company*

CERTIFICATE OF SERVICE

I certify that on December 12, 2025, a true and accurate copy of the foregoing was filed with the Court and served on all necessary parties through the Court's CM-ECF system, through electronic notice.

/s/ James Donaldson