

Gerolyn P. Roussel (admitted *pro hac vice*)
 Jonathan B. Clement (admitted *pro hac vice*)
 Benjamin P. Dinehart (admitted *pro hac vice*)
ROUSSEL & CLEMENT
 1550 West Causeway Approach
 Mandeville, LA 70471
 Telephone: (985) 778-2733
 Facsimile: (985) 778-2734
 Email: rcfirm@rousselandclement.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*

Robert S. Westerman (VSB No. 43294)
 Kollin G. Bender (VSB No. 98912)
HIRSCHLER FLEISCHER, P.C.
 The Edgeworth Building
 2100 East Cary Street
 Richmond, Virginia 23223
 P.O. Box 500
 Richmond, Virginia 23218-0500
 Telephone: (804) 771-9500
 Facsimile: (804) 644-0957
 Email: 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*

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

In re:	*	
	*	Chapter 11
HOPEMAN BROTHERS, INC.,	*	
	*	Case No. 24-32428 KLP
Debtor	*	
	*	

**OPPOSITION AND OBJECTION TO MOTION OF THE DEBTOR FOR ENTRY OF AN
 ORDER (I) APPROVING THE SETTLEMENT AGREEMENT AND RELEASE
 BETWEEN THE DEBTOR AND THE CHUBB INSURERS; (II) APPROVING THE
 ASSUMPTION OF THE SETTLEMENT AGREEMENT AND RELEASE BETWEEN
 THE DEBTOR AND THE CHUBB INSURERS; (III) APPROVING THE SALE OF
 CERTAIN INSURANCE POLICIES; (IV) ISSUING AN INJUNCTION PURSUANT TO
 THE SALE OF CERTAIN INSURANCE POLICIES; AND (V) GRANTING RELATED
 RELIEF**

and



OPPOSITION AND OBJECTION TO MOTION OF THE DEBTOR FOR ENTRY OF AN ORDER (I) APPROVING THE SETTLEMENT AGREEMENT AND RELEASE BETWEEN THE DEBTOR AND CERTAIN SETTLING INSURERS; (II) APPROVING THE SALE OF CERTAIN INSURANCE POLICIES; (IV) ISSUING AN INJUNCTION PURSUANT TO THE SALE OF CERTAIN INSURANCE POLICIES; AND (V) GRANTING RELATED RELIEF

NOW INTO COURT, through undersigned counsel, come Janet Rivet and Kayla Rivet (surviving spouse and child of Tommy Rivet), Maxine Becky Polkey Ragusa, Valerie Ann Ragusa Primeaux, and Stephanie Jean Ragusa Connors (surviving spouse and children of Frank P. Ragusa, Jr.), and Erica Dandry Constanza and Monica Dandry Hallner (surviving children of Michael Dandry, Jr.) (collectively “Roussel & Clement Creditors” or “Creditors”), who oppose the Motion for Entry of An Order Approving the Settlement Agreement and Release Between the Debtor and the Chubb Insurers¹ (“Chubb Insurers Settlement Motion”) and the Motion for Entry of An Order Approving the Settlement Agreement and Release Between the Debtor and Certain Settling Insurers² (“Certain Settling Insurers Settlement Motion”), filed by Hopeman Brothers, Inc. (“Hopeman” or “Debtor”).

The Roussel & Clement Creditors adopt and incorporate by reference the *Objection of the United States Trustee to Motion of the Debtor for Entry of an Order (I) Approving the Settlement Agreement and Release between the Debtor and the Chubb Insurers; (II) Approving the Assumption of the Settlement Agreement and Release Between the Debtor and the Chubb Insurers; (III) Approving the Sale of Certain Insurance Policies; (IV) Issuing an Injunction Pursuant to the Sale of Certain Insurance Policies; (V) Granting Related Relief (Docket No. 9) (the “Chubb 9019 Motion”) and the Motion of the Debtor for Entry of an Order (I) Approving the Settlement*

¹BR. Doc. 9.

²BR. Doc. 53.

*Agreement and Release Between the Debtor and Certain Settling Insurers; (II) Approving the Sale of Certain Insurance Policies; (IV) Issuing an Injunction Pursuant to the Sale of Certain Insurance Policies; and (V) Granting Related Relief (Docket No. 53)*³, and *Huntington Ingalls Industries, Inc.*'s *Objection to the Insurance 9019 Motions*.⁴

WHEREFORE, Janet Rivet and Kayla Rivet (surviving spouse and child of Tommy Rivet), Maxine Becky Polkey Ragusa, Valerie Ann Ragusa Primeaux, and Stephanie Jean Ragusa Connors (surviving spouse and children of Frank P. Ragusa, Jr.), and Erica Dandry Constanza and Monica Dandry Hallner (surviving children of Michael Dandry, Jr.) submit that Hopeman Brothers, Inc.'s Motion for Entry of An Order Approving the Settlement Agreement and Release Between the Debtor and the Chubb Insurers⁵, and the Motion for Entry of An Order Approving the Settlement Agreement and Release Between the Debtor and Certain Settling Insurers⁶ should be denied.

Dated: December 2, 2024

Respectfully submitted,

/s/Kollin G. Bender
Robert S. Westermann (VSB No. 43294)
Kollin G. Bender (VSB No. 98912)
HRISCHLER FLEISCHER, P.C.
2100 East Cary Street
P.O. Box 500
Richmond, VA 23218-0500
Telephone: (804) 771-9500
Facsimile: (804) 644-0957
Email: rwestermann@hirschlerlaw.com
kbender@hirschlerlaw.com

³BR. Doc. 373.

⁴BR. Doc. 404.

⁵BR. Doc. 9.

⁶BR. Doc. 53.

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

-and-

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