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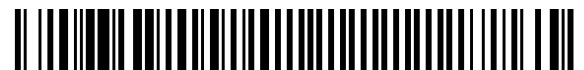
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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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
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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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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 2, 2024, a true and correct copy of the foregoing Objection was filed electronically using the Court's CM/ECF system, which thereby sent notice to all parties who have registered to receive such notice in the above-captioned case.

/s/ Kollin Bender
Counsel