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

In re:

HOPEMAN BROTHERS, INC.,

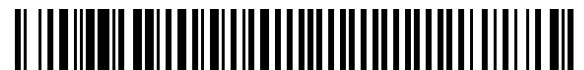
Debtor

Case No. 24-32428-KLP

Chapter 11

OBJECTION TO THE INSURANCE SETTLEMENT MOTIONS AND JOINDER

Daniel Cantrelle, Sr., Nolan LeBoeuf, Jr., David Guidry, Shirley Guidry, Dana Daigle on behalf of David Daigle, Sandra Robert on behalf of Daniel Robert and Al Clouatre (collectively, the “**Landry & Swarr Clients**”), by and through undersigned counsel, hereby file their objection and joinder (the “**Objection**”) to the *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* [ECF No. 9] (the “**Chubb Motion**”) and the *Motion of the Debtor for Entry of an Order (I)*



Approving the Settlement Agreement and Release Between the Debtor and the 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 [ECF No. 53] (the “**Certain Insurers Motion**”) filed by Hopeman Brothers, Inc. (the “**Debtor**”). In support of the Objection to the Chubb Motion and the Certain Insurers Motion, the Landry & Swarr Clients respectfully state as follows:

The Landry & Swarr Clients adopt and incorporate by reference the *Objection of the United States Trustee to: 1) 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,) and; 2) 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 (Docket No. 53)[ECF 373] and Huntington Ingalls Industries, Inc.’s Objection to the Insurance 9019 Motions* [ECF 404].

WHEREFORE, the Landry & Swarr Clients request that the Chubb Motion and the Certain Insurers Motion should both be denied and for such other relief as this Court deems appropriate and just.

Dated December 2, 2024

/s/ Lynn L. Tavenner

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on behalf of Daniel Robert and Al Clouatre*

CERTIFICATION OF SERVICE

I hereby certify that the foregoing Objection was filed electronically using the Court's CMECF system, which thereby sent notice to all parties who have registered to receive such notice in the above-captioned case.

/s/ Lynn L. Tavenner