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

**In re:**

**HOPEMAN BROTHERS, INC.,**

**Debtor.**

:  
: **Chapter 11**  
:  
: **Case No. 24-32428 (KLP)**  
:  
:  
:  
:

**DEBTOR'S WITNESS AND EXHIBIT LIST FOR  
JUNE 18, 2025 HEARING AT 11:00 A.M. (PREVAILING EASTERN TIME)**

The above-captioned debtor and debtor-in-possession (the "Debtor") respectfully submits the following as its Witness and Exhibit List for the hearing to be held on June 18, 2025, at 11:00 A.M. (prevailing Eastern Time) (the "Hearing") as follows:

**DEBTOR'S WITNESS LIST**

1. The Debtor reserves the right to call the following witnesses at the Hearing:
  - a. Chris Lascell; and
  - b. Ron Van Epps
2. The Debtor reserves the right to examine or cross-examine any witness called by any other party.



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3. The Debtor is prepared to seek the admission of any witness's declaration into evidence, proffer or forgo any direct testimony (reserving the right for re-direct), and make such witness available for questioning by the Court and any other party in interest, if any. The Debtor also reserves the right to call any witness, including a corporate representative, to authenticate or establish the foundation for any exhibit on the Debtor's list.

**DEBTOR'S EXHIBIT LIST**

4. The Debtor identifies the documents on the Exhibit List attached hereto as **Exhibit A** as those it may offer at the Hearing.

5. The Debtor reserves the right to supplement or amend its Exhibit List to (i) address documents produced by other parties recently or in the future; (ii) use and/or admit into evidence any exhibit identified on the exhibit list of any other party; and/or (iii) use and/or admit into evidence any exhibit used for impeachment purposes.

6. In addition to the documents and exhibits identified on **Exhibit A**, the Debtor reserves the right to offer or otherwise use at the Hearing: (i) documents or exhibits identified on the exhibit list of any other party or party-in-interest; (ii) pleadings filed by the parties in this matter; (iii) additional exhibits reasonably necessary to respond to issues presented during the Hearing; and (iv) charts, graphs, timelines, enlargements, models, or other demonstrative exhibits.

7. By listing an exhibit on this list, the Debtor does not concede that any particular exhibit is admissible or that it is admissible for all purposes. The Debtor reserves the right to object to admission of any document. The Debtor reserves the right to amend or supplement its exhibit list, or to add or subtract exhibits, prior to the conclusion of the Hearing. The Debtor also reserves the right to request the Court to take judicial notice of any exhibits as necessary.

Dated: June 17, 2025  
Richmond, Virginia

/s/ Henry P. (Toby) Long, III

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**EXHIBIT A**

## DEBTOR'S HEARING EXHIBIT LIST

**Hearing Date: June 18, 2025**

EXHIBIT NO.	DOCUMENT DESCRIPTION	ADMITTED
<b>Debtor's Ex. 1</b>	<i>Declaration of Christopher Lascell in Support of Chapter 11 Petition and First Day Pleadings of Hopeman Brothers, Inc.</i> [Docket No. 8].	
<b>Debtor's Ex. 2</b>	<p>The September 10, 2024 Hearing Transcript (the "<u>September 10 Transcript</u>") on <i>Motion of the Debtor for Entry of Interim and Final Order Extending the Automatic Stay to Stay Asbestos-Related Actions Against Non-Debtor Defendants</i> ("<u>Motion to Stay</u>"), 72:3-170:13, including each of the Debtor's exhibits that was admitted into evidence at the September 10 hearing in support of the Motion to Stay. The September 10 Transcript previously was entered into evidence at the March 10, 2025 hearing, without objection, on the <i>Motion of the Debtor for Entry of a Third Interim Order Extending the Automatic Stay to Stay Asbestos Related Actions Against Non-Debtor Defendants</i>.</p> <p>The Debtor will provide the Court with redacted and unredacted copies of the September 10 Transcript, and will comply with the <i>Confidentiality Agreement and Protective Order</i> [Docket No. 206] (the "<u>LMIC Protective Order</u>") to the extent the September 10 Transcript must be discussed in open court.</p>	
<b>Debtor's Ex. 3</b>	Protected Parties – <u>Exhibit 1</u> to the Proposed Fourth Interim Order Extending the Automatic Stay to Asbestos-Related Actions Against Non-Debtor Defendants [Docket No. 839, <u>Exhibit A</u> ]	
<b>Debtor's Ex. 4</b>	Direct Action Lawsuits – <u>Exhibit 2</u> to the Proposed Fourth Interim Order Extending the Automatic Stay to Asbestos-Related Actions Against Non-Debtor Defendants [Docket No. 839, <u>Exhibit A</u> ]	
<b>Debtor's Ex. 5</b>	Subpoena to Special Claims Services, Inc. – <u>Exhibit 1</u> to the Proposed Order approving the Motion to Quash [Docket No. 738, <u>Exhibit A</u> ]	
<b>Debtor's Ex. 6</b>	Settlement Agreement and Release Between Hopeman Brothers, Inc. and Liberty Mutual Insurance Company, dated March 21, 2003 (the " <u>Settlement Agreement</u> ") – <u>Exhibit 1</u> to [Sealed] Reply in Support of Claim Objection [Docket No. 877] (the " <u>Reply</u> ").	

EXHIBIT NO.	DOCUMENT DESCRIPTION	ADMITTED
	The Debtor filed the Settlement Agreement under seal, and, if required by Liberty to discuss the Settlement Agreement in open court, the Debtor will comply with the LMIC Protective Order and <i>Order Granting Motion of the Debtor for Entry of an Order Authorizing the Debtor to File Unredacted Copies of the Objection of Hopeman Brothers, Inc. to Claim No. 10 of Liberty Mutual Insurance Company Under Seal</i> [Docket No. 743] (“ <u>Sealing Order</u> ”).	
<b>Debtor’s Ex. 7</b>	<p>Indemnification and Hold Harmless Agreement Between Hopeman Brothers, Inc. and Liberty Mutual Insurance Company, dated March 21, 2003 (the “<u>Indemnification Agreement</u>”) – <u>Exhibit 2</u> to Reply.</p> <p>The Debtor filed the Indemnification Agreement under seal and, if required by Liberty to discuss the Indemnification Agreement in open court, the Debtor will comply with the LMIC Protective Order and Sealing Order.</p>	
<b>Debtor’s Ex. 8</b>	<p>Claim No. 10 – <u>Exhibit 3</u> to Reply.</p> <p>The Debtor filed Claim No. 10 under seal, and if required by Liberty to discuss Claim No. 10 in open court, the Debtor will comply with the LMIC Protective Order and Sealing Order.</p>	
<b>Debtor’s Ex. 9</b>	<p>Claim No. 19 – <u>Exhibit 4</u> to Reply.</p> <p>The Debtor filed Claim No. 19 under seal, and if required by Liberty to discuss Claim No. 19 in open court, the Debtor will comply with the LMIC Protective Order and Sealing Order.</p>	
	Any written direct testimony filed by witnesses the Debtor will call at the Hearing.	
	Any documents necessary for rebuttal.	
	Any exhibit designated by any other party.	