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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)

**TRAVELERS' JOINDER TO CHUBB INSURERS' MOTION TO ADJOURN PLAN
CONFIRMATION HEARING AND RELATED DEADLINES [Dkt. No. 882]**

The Travelers Indemnity Company; Travelers Casualty and Surety Company, formerly known as The Aetna Casualty and Surety Company; and St. Paul Fire and Marine Insurance Company (together, "Travelers") hereby join (the "Joinder") in Chubb Insurers' Motion to Adjourn the Plan Confirmation Hearing and Related Deadlines [Dkt. No. 882] (the "Motion") filed by 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) (together,



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the “Chubb Insurers”). In addition to the arguments raised in the Motion, and in further support of this Joinder, Travelers respectfully states as follows:

Travelers has not had adequate time to conduct necessary discovery in connection with the proposed Plan. Travelers served interrogatories on Hopeman with a response deadline of June 13, 2025 at 5:00 p.m. However, Hopeman did not respond by that deadline, and did not respond to Travelers’ follow-up email inquiring about the delay. Hopeman’s responses were not received until June 16, 2025 at 10:30 p.m., less than one week before objections to the Plan are due. Travelers is continuing to review the responses, but it appears that some may be materially deficient for similar reasons as set forth in the Motion.

Although Hopeman began producing documents responsive to Travelers’ requests on June 11, 2025, Hopeman has not produced all responsive documents. Hopeman asserted that some documents could not be produced without a Confidentiality Agreement, but did not provide a draft agreement until June 12. Although Travelers sent minor revisions to the draft Confidentiality Agreement to Hopeman on June 16, Hopeman has not yet approved the agreement. According to an email sent by Hopeman counsel at 6:15 p.m. on June 17, the agreement is likely acceptable but is still “subject to client review and approval.” The earliest Hopeman *may* provide a signature page is June 18, but Hopeman has not advised when it will produce the outstanding documents. In other words, Hopeman continues to withhold responsive documents that it has agreed to produce. Further, Travelers believes Debtor may be improperly withholding other documents for similar reasons as set forth in the Motion.

Additionally, the Committee produced no documents in response to the document requests propounded by Travelers to the Committee.

Travelers intends to participate in depositions, but no depositions have yet been scheduled, as set forth in the Motion.

For the above reasons and those stated in the Motion, Travelers joins in the Motion and respectfully asks that this Court adjourn the hearing on final approval of the Disclosure Statement (Dkt. No. 767) and confirmation of Debtor's proposed plan of Reorganization (Dkt. No. 766), scheduled for July 1, 2025 at 10:00 a.m. ET, and extend the related deadlines, including the deadline for filing objections to the Plan, for at least sixty (60) days.

Dated: June 17, 2025

STEPTOE LLP

/s/ Joshua R. Taylor

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Certificate of Service

I hereby certify that on this date I submitted the foregoing through the Court's CM/ECF system, causing a true and correct copy thereof to be electronically delivered and served via that system on all parties receiving electronic notices in these Chapter 11 cases.

Dated: June 17, 2025

STEPTOE LLP

/s/ Joshua R. Taylor

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