#### TROUTMAN PEPPER LOCKE LLP

Dabney J. Carr (VSB No. 28679) 1001 Haxall Pt. Richmond, VA 23219 Telephone: (804) 697-1200

Leslie A. Davis (admitted pro hac vice)

Washington, DC 20004 Telephone: (202) 274-2950

401 9th Street, NW

Counsel for Century Indemnity Company and Westchester Fire Insurance Company

#### WHITE AND WILLIAMS LLP

Patricia B. Santelle (admitted pro hac vice) 1650 Market Street One Liberty Place, Suite 1800 Philadelphia, PA 19103 Telephone: (215) 864-7000

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re: Chapter 11

HOPEMAN BROTHERS, INC., Case No. 24-32428 (KLP)

Debtor.

# MOTION TO EXPEDITE HEARING AND SHORTEN NOTICE PERIOD ON CHUBB INSURERS' MOTION TO ADJOURN PLAN CONFIRMATION HEARING AND RELATED DEADLINES

Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America ("Century") and Westchester Fire Insurance Company (on its own behalf and for policies issued by or novated to Westchester Fire Insurance Company) ("Westchester Fire") (Century and Westchester Fire together, the "Chubb Insurers"), hereby move pursuant to 11 U.S.C. § 105(a), Bankruptcy Rule 9006(c), and Local Rules 9013-1(N) and (O) (the "Motion") for an Order setting an expedited hearing and shortening the notice period on the *Chubb* Insurers' Motion to Adjourn Plan Confirmation Hearing and Related Deadlines (the "Motion to Adjourn") for June 24, 2025 at 1:00 p.m. prevailing Eastern Time and a corresponding deadline



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of <u>June 23, 2025 at 5:00 p.m. prevailing Eastern Time</u> for parties to file objection to the Motion and the Motion to Adjourn (the "Objection Deadline"). In support of the Motion, the Chubb Insurers state as follows:

- 1. On June 17, 2025, the Chubb Insurers filed the Motion to Adjourn requesting that the 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), along with the related June 23, 2025 Objection Deadline, for at least sixty (60) days.
- 2. As explained in the Motion to Adjourn, the Chubb Insurers have worked diligently in attempt to adhere to the highly compressed confirmation schedule requested by Debtor and set by the Court (Dkt. No. 782) (the "Scheduling Order"). Despite Debtor's representations to the Chubb Insurers and the Court that it would "proceed with utmost speed to provide non-privileged responsive documents" (Dkt. No. 759, p. 13 n. 6) and produce documents on a rolling basis in response to the Chubb Insurers' confirmation-related discovery requests, that did not occur. Debtor produced 7,000 pages of documents on June 5, 2025, and has made two additional productions since then.
- 3. As further described in the Motion to Adjourn, the Chubb Insurers have significant issues to resolve with Debtor and the Committee regarding their discovery responses and document productions. Most urgently, the Committee has not searched for or produced a single document in response to the Chubb Insurers' requests, including documents from its financial consultant, FTI, which Debtor and the Committee have identified as a witness to be called at the confirmation hearing. The Chubb Insurers cannot proceed with depositions until the issues regarding Debtor's and the Committee's document productions are resolved. The Chubb Insurers cannot prepare their Confirmation Objections and set forth "any relevant and admissible evidence in support of the

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objection" as required by the Solicitation Procedures Order (Dkt. No. 782, ¶ 3) if the Chubb

Insurers have not yet obtained the evidence they require to support their objections. Accordingly,

as the Court expressly authorized during the May 21, 2025 hearing on the Solicitation Procedures

Motion, the Chubb Insurers have filed the Motion to Adjourn.

4. The Objection Deadline is six days away. The Confirmation Hearing is currently

two weeks away. It is impossible that the Chubb Insurers will resolve discovery disputes with

Debtor and the Committee, obtain and review a document production from the Committee, take

depositions, and prepare and file evidence-based objections by July 1, 2025, much less by the June

24, 2025 deadline. An expedited hearing on, and shortened period for notice of, the Motion to

Adjourn is necessary and appropriate under the circumstances.

WHEREAS, the Chubb Insurers request that the Court enter the Proposed Order (1)

granting an expedited hearing on the Motion to Adjourn, (2) shortening the notice period on the

Motion to Adjourn, and (3) such other relief as this Court determines just and proper.

Dated: June 18, 2025

Respectfully submitted,

/s/ Dabney J. Carr

Dabney J. Carr (VSB No. 28679)

TROUTMAN PEPPER LOCKE LLP

1001 Haxall Pt.

Richmond, VA 23219

Telephone: (804) 697-1200

Dabney.carr@troutman.com

Leslie A. Davis (admitted pro hac

vice)

Troutman Pepper Locke LLP

401 9th Street, NW

Washington, DC 20004

Telephone: (202) 274-2958

Leslie.davis@troutman.com

-and-

3

Patricia B. Santelle (admitted *pro hac vice*)
White and Williams LLP
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103
Telephone: (215) 864-7000
santellep@whiteandwilliams.com

Counsel for Century Indemnity Company and Westchester Fire Insurance Company

# **CERTIFICATION**

Pursuant to Bankruptcy Local Rule 9013-1(N), I certify that the Chubb Insurers:

- 1. have carefully examined this matter and concluded that there is a true need for an emergency hearing;
  - 2. have not created the emergency through the lack of diligence; and
  - 3. have made a bona fide effort to resolve the matter without a hearing.

/s/ Dabney J. Carr	_
Dabney J. Carr	_

# EXHIBIT A

(Proposed Order)

#### TROUTMAN PEPPER LOCKE LLP

Dabney J. Carr (VSB No. 28679) 1001 Haxall Pt. Richmond, VA 23219 Telephone: (804) 697-1200

Leslie A. Davis (admitted *pro hac vice*) 401 9<sup>th</sup> Street, NW Washington, DC 20004 Telephone: (202) 274-2950

Counsel for Century Indemnity Company and Westchester Fire Insurance Company

#### WHITE AND WILLIAMS LLP

Patricia B. Santelle (admitted *pro hac vice*) 1650 Market Street One Liberty Place, Suite 1800 Philadelphia, PA 19103 Telephone: (215) 864-7000

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re: : Chapter 11

.

HOPEMAN BROTHERS, INC., : Case No. 24-32428 (KLP)

:

Debtor.

\_\_:

# ORDR SETTING AN EXPEDITED HEARING AND SHORTENED NOTICE PERIOD ON CHUBB INSURERS' MOTION TO ADJOURN PLAN CONFIRMATION HEARING AND RELATED DEADLINES

Upon the Chubb Insurers' motion (the "Motion") for entry of an order (this "Order") setting an expedited hearing on the Motion to Adjourn, shortening the notice period on the Motion to Adjourn, and granting related relief, and the Court having jurisdiction to consider the Motion and the relief requested therein; and it appearing that proper and adequate notice of the Motion has been given and no other or further notice is necessary; and up on the record herein; and after due deliberation thereon; and the Court having determined that there is good and sufficient cause for the relief granted in this order, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

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- 1. The relief requested in the Motion is hereby granted.
- 2. A hearing shall be held on June 24, 2025 at 1:00 p.m. (prevailing Eastern Time) to hear and consider the Motion to Adjourn and the Motion to Expedite and Shorten Time (collectively, the "Motions").
- 3. The deadline by which parties must file objections to the Motions is June 23, 2025 at 5:00 p.m. (prevailing Eastern Time).
- 4. The Chubb Insurers are authorized to take all actions necessary to implement the relief granted in this Order.
- 5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated:, 2025	
Richmond, Virginia	
, ,	UNITED STATES BANKRUPTCY JUDGE

#### WE ASK FOR THIS:

/s/ Dabney J. Carr
Dabney J. Carr (VSB No. 28679)
TROUTMAN PEPPER LOCKE LLP
1001 Haxall Pt.
Richmond, VA 23219
Telephone: (804) 697-1200
Dabney.carr@troutman.com

Leslie A. Davis (admitted *pro hac vice*)
Troutman Pepper Locke LLP
401 9<sup>th</sup> Street, NW
Washington, DC 20004
Telephone: (202) 274-2958
Leslie.davis@troutman.com

-and-

Patricia B. Santelle (admitted *pro hac vice*)
White and Williams LLP
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103
Telephone: (215) 864-7000
santellep@whiteandwilliams.com

Counsel for Century Indemnity Company and Westchester Fire Insurance Company

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on June 18, 2025, a true and correct copy of the foregoing Motion to Expedite Hearing and Shorten Notice Period on the Chubb Insurers' Motion to Adjourn Confirmation Hearing and Related Deadlines was served upon was served upon all parties receiving electronic notice through the Court's ECF notification system, and served upon the following via electronic mail and U.S. Mail:

#### Counsel for Hopeman Brothers, Inc.

Hunton Andrews Kurth LLP Joseph P. Rovira Catherine A. Rankin 600 Travis Street Suite 4200 Houston, TX 77002

### Counsel for Hopeman Brothers, Inc.

Hunton Andrews Kurth LLP Tyler P. Brown Henry P. (Toby) Long III Riverfront Plaza, East Tower 951 East Byrd Street Richmond, VA 23219

#### US Trustee for the Eastern District of Virginia

Attn: Kathryn R. Montgomery 701 East Broad Street Suite 4304 Richmond, VA 23219

# **Counsel for the Official Committee of Unsecured Creditors**

Caplin & Drysdale, Chartered Kevin C. Maclay Todd E. Phillips Jeffrey A. Liesemer Kevin M. Davis Nathaniel R. Miller 1200 New Hampshire Avenue NW, 8th Floor Washington, DC 20036

I FURTHER CERTIFY that on June 18, 2025, the foregoing Motion to Expedite Hearing and Shorten Notice Period on the Chubb Insurers' Motion to Adjourn Confirmation Hearing and Related Deadlines was served upon the service list attached hereto as Exhibit A via Electronic Mail; and via First Class Mail upon the service list attached hereto as Exhibit B.

\_\_\_\_\_\_\_/s/ Dabney J. Carr
Dabney J. Carr

# EXHIBIT A TO CERTIFICATE OF SERVICE

Description	CreditorName	CreditorNoticeName	Email
Top 20 law firms with unpaid	Creditorivanie	CreditorNoticeName	Lillan
settlement amounts and pending			
claims	Baron & Budd, P.C.	Ann Harper	aharper@baronbudd.com
Top 20 law firms with pending claims	Bodie Dolina Friddell Grenzer	James Smith	itsmith@bodie-law.com
Counsel for the Chubb Settling	Dedic Demia i Haden Crenzer	Carries Crimar	John and Sould law soul
Insurers	Brandywine Holdings	Sandra Hourahan	Sandra.hourahan@brandywineholdings.com
Counsel for the Chubb Settling		Shelby Mattioli, SVP Direct	g
Insurers	Brandywine Holdings	Claims	Shelby.Mattioli@brandywineholdings.com
Top 20 law firms with unpaid			
settlement amounts and pending			
claims	Brayton Purcell LLP	Alan Brayton	abrayton@braytonlaw.com
Top 20 law firms with unpaid			,
settlement amounts and pending	Brookman Rosenburg Brown &		
claims	Sandler	Larry Brown	lbrown@brbs.com
Proposed Counsel for Marla Rosoff			
Eskin, Future Claimants'		David B. Salzman, Kathryn L.	dsalzman@camlev.com;
Representative	Campbell & Levine, LLC	Harrison	kharrison@camlev.com
			kmaclay@capdale.com;
		Kevin C. Maclay, Todd E.	tphillips@capdale.com;
		Phillips, Jeffrey A. Liesemer,	jliesemer@capdale.com;
Counsel for the Official Committee of		Kevin M. Davis, Nathaniel R.	kdavis@capdale.com;
Unsecured Creditors	Caplin & Drysdale, Chartered	Miller	nmiller@capdale.com
	Capilli a Diyeaale, charterea		dgooding@choate.com;
Counsel for Liberty Mutual Insurance		Douglas R. Gooding, Jonathan	jmarshall@choate.com;
Company	Choate, Hall & Stewart LLP	D. Marshall, Kevin J. Finnerty	kfinnerty@choate.com
Top 20 law firms with unpaid	Oriodio, Fidir d Otowart EE	D. Marchan, Novince. 1 milerty	inimiorty@oriodici.com
settlement amounts	Goldberg Persky White P.C.	Theodore Goldberg	tgoldberg@gdldlaw.com
Local Counsel for Janet Rivet, Kayla	Coldberg Foliaky White F.C.	Theodore Coldberg	igolabolg@galalaw.com
Rivet, Maxine Becky Polkey Ragusa,			
Valerie Ann Ragusa Primeaux,			
Stephanie Jean Ragusa Connors,			
Erica Dandry Constanza and Monica		Robert S. Westermann, Kollin	rwestermann@hirschlerlaw.com;
Dandry Hallner	Hirschler Fleischer, P.C.	G. Bender	kbender@hirschlerlaw.com
IRS	Internal Revenue Service	Attn Susanne Larson	SBSE.Insolvency.Balt@irs.gov
Top 20 law firms with pending claims	Irwin Fritchie Urguhart & Moore	Gus Fritchie	gfritchie@irwinllc.com
Counsel for Liberty Mutual Insurance	IIIIII I IIII O O I qui ai t a i iio o i o	Cue i incine	girtoriio@irwiriiio.com
Company	Kaufman & Canoles, P.C.	Douglas M. Foley	dmfoley@kaufcan.com
Top 20 law firms with unpaid	radinar a carolog, r.c.	Douglas III. 1 oloy	unioloy@kaaroan.oom
settlement amounts and pending			
claims	Law Office of Phillip C. Hoffman	Phillip Hoffman	phil@pchlawfirm.com
Top 20 law firms with unpaid			FrGr
settlement amounts	Law Offices of Alwyn H. Luckey	Alwyn Luckey	reception@alwynluckey.com
Top 20 law firms with unpaid	Law Offices of G. Patterson	, , , , , , , , , , , , , , , , , , , ,	
settlement amounts	Keahey, P.C.	G. Patterson Keahey, Jr.	info@mesohelp.com
Top 20 law firms with pending claims		Paul Weykamp	pweykamp@weykamplaw.net
Top 20 law firms with pending claims		Scott Nelson	contact.us@thelomaxlawfirm.com
, and a second second			dhayes@mcguirewoods.com;
		Dion W. Hayes, Sarah B.	sboehm@mcguirewoods.com;
Counsel for Huntington Ingalls		Boehm, Connor W. Symons, K.	csymons@mcguirewoods.com;
Industries, Inc.	McGuireWoods LLP	Elizabeth Sieg	bsieg@mcguirewoods.com
Top 20 law firms with unpaid		9	33
settlement amounts and pending			
claims	Peter Angelos Law	James Zavakos	jzavakos@lawpga.com
Top 20 law firms with pending claims	Pourciau Law Firm	Damon Pourciau	drp@pourciaulaw.com
Top 20 law firms with unpaid			
settlement amounts	Provost Umphrey Law Firm, L.L.P.	Brian Blevins Jr. Colin Moore	dfelps@provostumphrey.com
Proposed Counsel for Marla Rosoff		Distribution of the Country of the C	a.c.pc@provoctampmoy.com
Eskin, Future Claimants'			
Representative	Reaves PLLC	Michael G. Wilson	mike.wilson@reavescoley.com
rioprocontativo	1 TOUTOUT LEG	MICHAEL C. THISOH	Time Time of the Tour obooticy Touris

# **EXHIBIT A TO CERTIFICATE OF SERVICE (2)**

Description	CreditorName	CreditorNoticeName	Email
Lead Counsel for Janet Rivet, Kayla			
Rivet, Maxine Becky Polkey Ragusa,			
Valerie Ann Ragusa Primeaux,			
Stephanie Jean Ragusa Connors,			
Erica Dandry Constanza and Monica		Gerolyn Roussel, Jonathan B.	
Dandry Hallner	Roussel & Clement	Clement, Benjamin P. Dinehart	rcfirm@rousselandclement.com
Top 20 law firms with unpaid		,	
settlement amounts	Shein Law	Peter Shein	bshein@sheinlaw.com
Top 20 law firms with pending claims	Shrader & Associates, L.L.P.	Ross D. Stomel II	ross@shraderlaw.com
Top 20 law firms with unpaid		THE STATE OF THE S	
settlement amounts	Simmons Hanly Conroy	John Simmons	john@simmonsfirm.com
Top 20 law firms with unpaid	Chimions rightly Control	Commonitions	joint@diminoridimin.com
settlement amounts and pending			
claims	Stephen L. Shackelford, PLLC	Stephen Shackelford	steve@shackelfordlawoffice.com
Counsel for The Travelers Indemnity	Stephen L. Shackehold, I LLC	Stephen Shackehord	steve@snackenordiawonice.com
The state of the s			
Company, Travelers Casualty and			
Surety Company, formerly known as			
The Aetna Casualty and Surety		I	11-1-0-1-1
Company, and St. Paul Fire and	0	Joshua R. Taylor and Catherine	jrtaylor@steptoe.com;
Marine Insurance Company	Steptoe LLP	D. Cockerham	ccockerham@steptoe.com
Top 20 law firms with unpaid			
settlement amounts and pending	CAN DESCRIPTION OF THE PROPERTY OF THE PROPERT	SAFETY OF THE STATE OF THE STAT	
claims	The Gori Law Firm	Christopher Layloff	clayloff@gorilaw.com
Counsel for Century Indemnity			
Company, Westchester Fire			
Insurance Company, Continental			
Casualty Company, and General			
Reinsurance Corporation	Troutman Pepper Locke LLP	Dabney J. Carr, IV	dabney.carr@troutman.com
Counsel for the Chubb Settling			2
Insurers, Century Indemnity			
Company, Westchester Fire			
Insurance Company, Continental			
Casualty Company, and General		Leslie A. Davis and Michael T.	
Reinsurance Corporation	Troutman Pepper Locke LLP	Carolan	Leslie.davis@troutman.com
Office of the US Trustee for the	US Trustee for the Eastern District	- C-	
Eastern District of Virgina	of Virgina	Attn: Kathryn R. Montgomery	kathryn.montgomery@usdoj.gov
Virginia Attorney General	Virginia Attorney General	Attn Bankruptcy Department	mailoag@oag.state.va.us
Top 20 law firms with unpaid	Const. Superment. Const. Const	The state of the s	111111111111111111111111111111111111111
settlement amounts	Weitz & Luxenberg	Perry Weitz	info@weitzlux.com
Counsel for the Chubb Settling	3		
Insurers and Certain Settling			
Insurers, Century Indemnity			
Company, Westchester Fire			
Insurance Company, Continental			
Casualty Company, and General			
Reinsurance Corporation	White and Williams LLP	Patricia B. Santelle	santellep@whiteandwilliams.com
Top 20 law firms with pending claims	Wombie Bond Dickinson	Theodore F. Roberts	Ted.Roberts@wbd-us.com

# EXHIBIT B TO CERTIFICATE OF SERVICE

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
			120 E. Baltimore St., Ste.				
Top 20 law firms with pending claims	Ashcraft & Gerel	Dominick Callela	1802		Baltimore	MD	21202
Top 20 law firms with unpaid settlement		NAME OF TAXABLE PARTY.	3355				
amounts and pending claims	Baron & Budd, P.C.	Ann Harper	3102 Oak Lawn Ave #1100		Dallas	TX	75219
Top 20 law firms with pending claims	Bodie Dolina Friddell Grenzer	James Smith	1301 York Road, Suite 402		Lutherville	MD	21093
Counsel for the Chubb Settling Insurers	Brandywine Holdings	Sandra Hourahan	436 Walnut Wa06s St		Philadelphia	PA	19106
•	,	Shelby Mattioli, SVP Direct		8			
Counsel for the Chubb Settling Insurers	Brandywine Holdings	Claims	510 Walnut Street, WB11E		Philadelphia	PA	19106
Top 20 law firms with unpaid settlement							
amounts and pending claims	Brayton Purcell LLP	Alan Brayton	222 Rush Landing Rd.	PO Box 6169	Novato	CA	94948
Top 20 law firms with unpaid settlement	Brookman Rosenburg Brown &		24 N. Bryn Mawr Ave., Suite	1 1 1 1 1 1			1.11
amounts and pending claims	Sandler	Larry Brown	309		Bryn Mawr	PA	19010
Proposed Counsel for Marla Rosoff	B 100 P 100	David B. Salzman, Kathryn L.					
Eskin, Future Claimants' Representative	Campbell & Levine, LLC	Harrison	310 Grant Street, Suite 1700		Pittsburgh	PA	15219
*	*	Kevin C. Maclay, Todd E.	-				
		Phillips, Jeffrey A. Liesemer,					
Counsel for the Official Committee of		Kevin M. Davis, Nathaniel R.	1200 New Hampshire				
Unsecured Creditors	Caplin & Drysdale, Chartered	Miller	Avenue NW, 8th Floor		Washington	DC	20036
Counsel for Liberty Mutual Insurance		Douglas R. Gooding, Jonathan					
Company	Choate, Hall & Stewart LLP	D. Marshall, Kevin J. Finnerty	Two International Place		Boston	MA	02110
Top 20 law firms with unpaid settlement	Cumbest, Cumbest, Hunter &	111111111111111111111111111111111111111			1		
amounts and pending claims	McCormick, P.A.	David McCormick	729 Watts Ave	PO Box 1287	Pascagoula	MS	39567
Official Committee of Unsecured				112 Madison Avenue,			
Creditors	Darrell Kitchen	Lisa Nathanson Busch, Esquire	Simmons Hanly Conroy	7th Floor	New York	NY	10016
Official Committee of Unsecured		-		1 Galleria Blvd. Ste.			
Creditors	Donald M. Hoffman, Jr	Stephen Austin, Esquire	Stephen J. Austin, LLC	1900	Metairie	LA	70001
Top 20 law firms with unpaid settlement							
amounts	Ferrell Law Group	James Ferrell	6226 Washington Ave.	Ste 200	Houston	TX	77007
Top 20 law firms with unpaid settlement							
amounts	Goldberg Persky White P.C.	Theodore Goldberg	11 Stanwix St	Suite 1800	Pittsburgh	PA	15222
	Goodman, Meagher & Enoch,	-		100 N. Charles St.,			
Top 20 law firms with pending claims	LLP	John Amato IV	One Charles Center	Ste. 1610	Baltimore	MD	21201
Local Counsel for Janet Rivet, Kayla							
Rivet, Maxine Becky Polkey Ragusa,							
Valerie Ann Ragusa Primeaux,							
Stephanie Jean Ragusa Connors, Erica		Control Control Control					
Dandry Constanza and Monica Dandry	NAME OF THE PARTY	Robert S. Westermann, Kollin	C 1204 D 1 1 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	series and the series of the s	200000000000000000000000000000000000000		er-constant dutor
Hallner	Hirschler Fleischer, P.C.	G. Bender	The Edgeworth Building	2100 East Cary Street	Richmond	VA	23223
Local Counsel for Janet Rivet, Kayla	2111						1
Rivet, Maxine Becky Polkey Ragusa,							
Valerie Ann Ragusa Primeaux,							
Stephanie Jean Ragusa Connors, Erica							
Dandry Constanza and Monica Dandry		Robert S. Westermann, Kollin					COLUMN TO SERVICE
Hallner	Hirschler Fleischer, P.C.	G. Bender	P.O. Box 500		Richmond	VA	23218-0500
IRS	Internal Revenue Service	Attn Susanne Larson	31 Hopkins Plz Rm 1150		Baltimore	MD	21201

# **EXHIBIT B TO CERTIFICATE OF SERVICE (2)**

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
10 10 10 10 10 10 10 10 10 10 10 10 10 1	*	Centralized Insolvency				-	
IRS	Internal Revenue Service	Operation	PO Box 7346		Philadelphia	PA	19101-7346
					New		
Top 20 law firms with pending claims	Irwin Fritchie Urquhart & Moore	Gus Fritchie	400 Poydras St., Ste 2700		Orleans	LA	70130
Counsel for Liberty Mutual Insurance				1021 E. Cary Street,		,	-
Company	Kaufman & Canoles, P.C.	Douglas M. Foley	Two James Center	Suite 1400	Richmond	VA	23219
Top 20 law firms with unpaid settlement	A- 500 May 200 May 100	CANADA NEW MICH.	**************************************	**************************************	New	2006	
amounts and pending claims	Law Office of Phillip C. Hoffman	Phillip Hoffman	400 Poydras Street	Suite 1625	Orleans	LA	70130
Top 20 law firms with unpaid settlement					Ocean		
amounts	Law Offices of Alwyn H. Luckey	Alwyn Luckey	PO Box 724		Springs	MS	39566
	200				N Topsail		
Top 20 law firms with pending claims	Law Offices of Clifford Cuniff	Clifford Cuniff	1070 New River Inlet Rd		Bch	NC	28460-9248
Top 20 law firms with unpaid settlement	Law Offices of G. Patterson		2 11 11 1				
amounts	Keahey, P.C.	G. Patterson Keahey, Jr.	One Independence Plaza	Suite 612	Birmingham	AL	35209
		_ *************************************	909 Ridgebrook Road, Suite			DEL	
Top 20 law firms with pending claims	Law Offices of Paul A. Weykamp		108		Sparks	MD	21152
Top 20 law firms with pending claims	Law Offices of Peter T. Nicholl	Peter Nicholl	36 S. Charles St., Ste. 1700	DO D 4000		MD	21201
Top 20 law firms with pending claims	Lomax Law Firm	Scott Nelson	2502 Market St.	PO Drawer 1368	Pascagoula	MS	39568-1368
		Dion W. Hayes, Sarah B.					
Counsel for Huntington Ingalls Industries,	McGuireWoods LLP	Boehm, Connor W. Symons, K. Elizabeth Sieg	Cataway Plans	800 East Canal Street	Richmond	1/4	23219
Inc. Official Committee of Unsecured	McGuirevoods LLP	Elizabeth Sieg	Gateway Plaza  Dean Omar Branham Shirley,		Richmond	VA	23219
	Maliana Danman	I Bradley Carith Familia	LLP	Ste. 300	Dallas	TV	75000
Creditors Official Committee of Unsecured	Melissa Beerman	J. Bradley Smith, Esquire	LLP	100 N. Charles Street.	Dallas	TX	75202
Creditors	Nancy McComas-Doiron	Carol A. Hastings, Esquire	Peter Angelos Law	20th Floor	Baltimore	MD	21201
Creditors	Nancy McComas-Doiron	Carol A. Hastings, Esquire	1500 JFK Blvd. (Two Penn	ZUITI FIOOF	bailimore	MD	21201
Top 20 law firms with pending claims	Nass Cancelliere Brenner	David Brenner	Center)	Suite 404	Philadelphia	DA	19102
Top 20 law little with perioling claims	Patten, Wornom, Hatten &	David Breilier	12350 Jefferson Ave., Ste.	Suite 404	Newport	FA	19102
Top 20 law firms with pending claims	Diamonstein, LC	Donald Patten	300		News	VA	23602
Top 20 law firms with unpaid settlement	Diamonstein, LO	Donaid Fatteri	300		IVEWS	VA	23002
amounts and pending claims	Peter Angelos Law	James Zavakos	100 North Charles St.	22nd Floor	Baltimore	MD	21201
amounts and pending daims	T CICI Aligeios Law	Dames Zavakos	100 North Chanes Ct.	ZZIIG I IOOI	Baton	IVID	21201
Top 20 law firms with pending claims	Pourciau Law Firm	Damon Pourciau	8550 United Plaza Blvd	Suite 702	Rouge	LA	70809
Top 20 law firms with unpaid settlement	Provost Umphrey Law Firm,	Daniel, Foureida	COOC CIMOU I IAZA ZIVA	00.07.02	riougo	_ `	. 0000
amounts	L.L.P.	Brian Blevins, Jr., Colin Moore	350 Pine Street	Suite 1100	Beaumont	TX	77701
Proposed Counsel for Maria Rosoff			555 Belaire Avenue, Suite				
Eskin, Future Claimants' Representative	Reaves PLLC	Michael G. Wilson	300		Chesapeake	VA	23320
Counsel for the Chubb Settling Insurers	11007001220	This is a second			onocapouno		20020
and Certain Settling Insurers	Resolute Management Inc.	Senior Vice-President, Claims	125 High Street	Suite 1010	Boston	MA	02110
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		Gerolyn Roussel, Jonathan B.					
Hallner	Roussel & Clement	Clement, Benjamin P. Dinehart	1550 W Causeway Approach		Mandeville	LA	70471

# **EXHIBIT B TO CERTIFICATE OF SERVICE (3)**

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Top 20 law firms with unpaid settlement	11111						
amounts	Scott & Scott, LTD	Tom Scott	PO Box 2009		Jacksonville	MS	39215
Top 20 law firms with unpaid settlement							
amounts	Shein Law	Peter Shein	121 South Broad St.	21st Floor	Philadelphia	PA	19107
			9 E. Greenway Plaza, Ste.	× ·	8		1
Top 20 law firms with pending claims	Shrader & Associates, L.L.P.	Ross D. Stomel II	2300		Houston	TX	77046
Top 20 law firms with unpaid settlement							
amounts	Simmons Hanly Conroy	John Simmons	One Court St.		Alton	IL	62002
Top 20 law firms with unpaid settlement				·			
amounts and pending claims	Stephen L. Shackelford, PLLC	Stephen Shackelford	5 Old River PI	Ste 204	Jackson	MS	39202
Counsel for The Travelers Indemnity	•	11					
Company, Travelers Casualty and Surety							
Company, formerly known as The Aetna							
Casualty and Surety Company, and St.							
Paul Fire and Marine Insurance		Joshua R. Taylor and Catherine	1330 Connecticut Avenue,				
Company	Steptoe LLP	D. Cockerham	N.W.		Washington	DC	20036
Top 20 law firms with unpaid settlement							
amounts and pending claims	The Gori Law Firm	Christopher Layloff	156 N. Main St.		Edwardsville	IL	62025
Counsel for Century Indemnity Company,				Ŷ			
Westchester Fire Insurance Company,							
Continental Casualty Company, and							
General Reinsurance Corporation	Troutman Pepper Locke LLP	Dabney J. Carr, IV	1001 Haxall Pt.		Richmond	VA	23219
Counsel for the Chubb Settling Insurers,	i vici-			K	0		
Century Indemnity Company,							
Westchester Fire Insurance Company,							
Continental Casualty Company, and		Leslie A. Davis and Michael T.					
General Reinsurance Corporation	Troutman Pepper Locke LLP	Carolan	401 9th Street NW	Suite 1000	Washington	DC	20004
Office of the US Trustee for the Eastern	US Trustee for the Eastern						
District of Virgina	District of Virgina	Attn: Kathryn R. Montgomery	701 East Broad Street	Suite 4304	Richmond	VA	23219
Official Committee of Unsecured				1015 Locust Street,			
Creditors	Veronica Miller	Chris McKean, Esquire	MRHFM Law Firm	Ste. 1200	St. Louis	MO	63101
Virginia Attorney General	Virginia Attorney General	Attn Bankruptcy Department	202 North Ninth Street	8	Richmond	VA	23219
Top 20 law firms with unpaid settlement							
amounts	Weitz & Luxenberg	Perry Weitz	700 Broadway		New York	NY	10003
Counsel for the Chubb Settling Insurers		1					
and Certain Settling Insurers, Century							
Indemnity Company, Westchester Fire							
Insurance Company, Continental							
Casualty Company, and General				One Liberty Place,			
Reinsurance Corporation	White and Williams LLP	Patricia B. Santelle	1650 Market Street	Suite 1800	Philadelphia	PA	19103
Top 20 law firms with pending claims	Womble Bond Dickinson	Theodore F. Roberts	100 Light Street, 26th Floor		Baltimore	MD	21202