Docket #1524 Date Filed: 07/13/2026

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:	)	Chapter 11
HOPEMAN BROTHERS, INC.,	)	Case No. 24-32428 (KLP)
Debtor.	)	

HUNTINGTON INGALLS INDUSTRIES, INC.'S OBJECTION TO LIBERTY MUTUAL INSURANCE COMPANY'S MOTION FOR LIMITED MODIFICATION OF MEDIATION ORDER AND JOINDER TO ADDITIONAL OBJECTIONS THERETO

Huntington Ingalls Industries, Inc. ("HII"), by and through undersigned counsel, hereby joins in any objection filed by the above-captioned debtor (the "Debtor"), the Official Committee of Unsecured Creditors (the "UCC"), and/or any other party-in-interest (collectively, the "Objections") with respect to *Liberty Mutual Insurance Company's Motion for Limited Modification of Mediation Order* [ECF No. 1518] (the "Motion") filed by Liberty Mutual Insurance Company ("Liberty"). HII adopts and incorporates by reference the Objections as if set forth fully herein (the "Joinder"). In connection with such Joinder, HII reserves any and all rights,

claims, and defenses with regard to any liability asserted against HII, and to the extent any Objection asserts such, HII does not join such Objection to the extent thereof.

In addition to the Joinder, HII objects to the Motion on the ground that it relied in good faith upon the protections of the *Order Authorizing Mediation of Chubb Insurers Settlement Motion* [ECF No. 443] (the "Mediation Order") which Liberty now seeks to pierce via its Motion. However, the Motion focuses on the conduct of the Debtor, and to a lesser extent, the UCC. HII is not mentioned in the Motion.[1] Indeed, HII has not participated in the contested matter surrounding Liberty's proof of claim (the "Contested Matter") which prompted the Motion. HII did, however, participate in the at-issue mediation, and in doing so it relied upon the confidentiality protections of the Court, as set forth in the Mediation Order, including that "[t]he Mediation Communications shall be confidential, **shall not be subject to discovery**, shall be inadmissible in **any** Proceeding, and also shall be subject to protection under Rule 408 of the Federal Rules of Evidence, Local Bankruptcy Rule 9019-1(J), and any equivalent or comparable state law." Mediation Order, ¶ 8 (emphasis added). Whatever the conduct of the Debtor—which for the avoidance of doubt is insufficient to justify modification of the Mediation Order—and whatever may have occurred in the Contested Matter, it is inequitable to post-hoc strip HII of its explicitly enumerated protections all due to a Contested Matter to which HII is not a party. Liberty seeks a manifest injustice which, if granted, would chill mediation in this case and all others in the Eastern District of Virginia.

[1] It bears noting that HII is not a "Plan Proponent" as defined in the *Modified Amended Plan of Reorganization of Hopeman Brothers, Inc. under Chapter 11 of the Bankruptcy Code*, dated August 21, 2025 [ECF No. 1141].

For these reasons, HII respectfully requests that the Motion be denied in its entirety with prejudice and that the Court grant any relief in favor of the parties filing Objections that is just and proper.

Dated: July 13, 2026
Richmond, Virginia

Respectfully submitted,

/s/ K. Elizabeth Sieg

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 13th day of July, 2026, a true and correct copy of the foregoing was served via the Court's electronic case filing system (CM/ECF) to all parties registered to receive such notice in the above-captioned case.

/s/ K. Elizabeth Sieg
K. Elizabeth Sieg