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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

IN RE:	)	
	)	
HOPEMAN BROTHERS, INC.,	)	Case No. 24-32428-KLP
	)	
DEBTOR.	)	
	)	

JOINDER OF THE FUTURE CLAIMANTS' REPRESENTATIVE TO THE OBJECTIONS TO LIBERTY MUTUAL INSURANCE COMPANY'S MOTION FOR LIMITED MODIFICATION OF MEDIATION ORDER

AND NOW, comes Marla Rosoff Eskin, Esq., as the Future Claimants' Representative (the "FCR"), by and through her undersigned counsel, and files this Joinder in the Objections of the debtor, Hopeman Brothers, Inc. (the "Debtor") and the Official Committee of Unsecured Creditors of the Debtor (the "Committee"), and avers as follows.

1. The FCR joins in the Objections of the Debtor and the Committee, for all the reasons set forth herein.

2. Liberty Mutual's Motion seeks discovery of confidential mediation documents and communications related to plan negotiations, which mediation resulted in a plan of reorganization acceptable to the Committee.

3. As the FCR has previously argued, Liberty Mutual's claim is based on negotiations

and the Indemnification Agreement, all of which were negotiated and settled without the knowledge or consent of the beneficiaries of the Debtor's Liberty Mutual policies. The Indemnification Agreement was a blatant attempt to prevent beneficiaries from validly recovering under the policies and the Debtor's purported "Minimization requirements" are simply an attempt by Liberty Mutual to hide potential coverage from those beneficiaries.

4. The Motion is clearly part of Liberty Mutual's effort to continue the scheme to force the terms of Indemnification Agreement on the policies' beneficiaries, at continued significant expense to the Debtor's estate.

5. The Debtor's estate continues to be drained of resources that could be used to pay valid claims but instead are being depleted by the costs associated with Liberty Mutual's continued attempts to avoid its obligations to the beneficiaries under the policies.

6. For these reasons, the Motion must be denied. The FCR also joins in the objections to the Motion brought by the Debtor and the Committee.

[Signature Page to Follow]

WHEREFORE, the FCR joins in the Objections of the Debtor and the Committee, requests entry of an Order denying the Motion for Limited Modification of Mediation Order, and asks that the Court grant to the FCR such other and further relief as is just and appropriate.

Dated: July 13, 2026

Respectfully submitted,

/s/ Michael G. Wilson

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