

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re :

HOME PRODUCTS IN INTERNATIONAL,  
INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 7

Case No. 22-06276

Hon. Janet S. Baer

(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF DAVID R. DOYLE  
PURSUANT TO BANKRUPTCY RULE 2014(A)**

I, David R. Doyle, pursuant to 28 U.S.C. § 1746, hereby depose and state under the penalty of perjury as follows:

1. I am an attorney duly licensed and authorized to practice law in the State of Illinois. I am admitted to practice in the United States District Court for the Northern District of Illinois.

2. I am a member at the law firm of Cozen O'Connor ("Cozen"). In that capacity, I am authorized to submit this supplemental declaration (the "Supplemental Declaration") in support of the *Application of Trustee for Authority to Employ Ira Bodenstein, David R. Doyle and Cozen O'Connor as General Bankruptcy Counsel Effective as of July 28, 2023 and for Related Relief* (the "Application," and all undefined terms herein shall carry the meanings given them in the Application and the *Declaration of David R. Doyle pursuant to Bankruptcy Rule 2014(a)* (the "Initial Declaration"), submitted in support of the Application).

3. This Supplemental Declaration is submitted to supplement the Initial Declaration by identifying approximately 182 parties in interest (the "Additional Disclosure Parties") in

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<sup>1</sup> The Debtors in these Chapter 7 Cases, along with the last four digits of each Debtor's federal identification number, are: Home Products International, Inc. (7027) and Home Products International-North America, Inc. (0451).

addition to the approximately 323 Disclosure Parties identified in the Initial Declaration. The Additional Disclosure Parties are attached hereto as Exhibit 1.

4. As set forth in the Initial Declaration, to the best of my knowledge, information and belief, Cozen is a “disinterested person” within the scope of 11 U.S.C. § 101(14) and as required by 11 U.S.C. § 327(a).

5. In connection with its proposed retention by the Estates, Cozen has researched its client database to determine whether it has any current relationships with the Additional Disclosure Parties and will continue to do so periodically throughout the Cases and supplement this disclosure as necessary.

6. Based on its conflicts search, Cozen has determined that it has no connections with the Additional Disclosure Parties except as set forth in Exhibit 2. Cozen does not represent any adverse interest in connection with the matters upon which it is to be employed, and to the extent that the Trustee determines to take an adverse position with respect to one of Cozen’s existing clients, and such client does not waive the conflict, it is my understanding that the Trustee will retain separate conflicts counsel.

7. In particular, and in addition to the disclosures on Exhibit 2, to the best of my knowledge, information and belief, DLDM Investment Limited (“DLDM”) was listed as a creditor in the Debtors’ bankruptcy schedules with a claim of \$0.00. To the best of my knowledge, information and belief, Cozen represented DLDM Investment Limited in connection with a litigation matter adverse to Home Products International – North America, Inc. unrelated to these Cases. To the best of my knowledge, information and belief, that representation has ended.

8. Cozen has searched its client database for connections in which there is a current client relationship or adversity. It is possible that Cozen has other relationships not disclosed

herein in connection with matters unrelated to these Cases that are closed or are not currently pending. In addition, for Additional Disclosure Parties identified as clients in Exhibit 2, Cozen may simultaneously be, or previously have been, adverse to such Additional Disclosure Parties in other matters and such simultaneous or previous adversity may not be separately identified in Exhibit 2.

9. Cozen is not currently representing any creditor or other party in interest in connection with the Cases to the best of the undersigned's knowledge, information and belief.

I state under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: August 28, 2023

/s/ David R. Doyle  
David R. Doyle

**CERTIFICATE OF SERVICE**

David R. Doyle, an attorney, certifies that he caused to be served a true copy of the foregoing notice and **the SUPPLEMENTAL DECLARATION OF DAVID R. DOYLE PURSUANT TO BANKRUPTCY RULE 2014(A)** upon the attached Service List in the manner indicated on August 28, 2023.

/s/ David R. Doyle

CM/ECF

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**VIA U.S. MAIL**

BMO Harris Bank N.A., c/o AIS Portfolio Services, LLC  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118

National Union Fire Insurance Company Of Pittsburgh, PA  
c/o Adam L. Rosen PLLC  
1051 Port Washington Blvd  
PO Box 552  
Port Washington, NY 11050-0146

Eva D Gadzheva  
Goldberg Kohn Ltd  
55 East Monroe Street  
Suite 3300  
Chicago, IL 60603

Epiq Corporate Restructuring, LLC  
777 Third Avenue, 12th Floor  
New York, NY 10017

**EXHIBIT 1**

List of Additional Disclosure Parties

A & M VENDING INC  
A-1 PALLETT CO. OF CLARKSVILLE,  
INC.  
ABSOLUTE HAITIAN  
ACCORIAN  
ACCURATE OFFICE SUPPLY  
ACCURATE SCALE COMPANY  
ACE HARDWARE GROUP  
ACME DOOR  
AIR BLOWER SERVICES, INC  
AIR SYSTEMS INC.  
ALLIED ELECTRONICS &  
AUTOMATION  
AMERICAN INDUSTRIAL CORP  
ANDERSON PUMP & PROCESS  
ASCENTIAL INC. (FKA WGSN INC.)  
BAILEY MECHANICAL CORP.  
BASELINE DATA SERVICES, LLC  
BELT RAILWAY  
BENTONVILLE COMMERCE, LLC  
BERTNER THREAD COMPANY  
BLUE RIDGE INDUSTRIES, INC.  
BP LUBRICANTS USA INC.  
BUREAU VERITAS HONG KONG LTD  
CALIBER PACKAGING LLC  
CAMSO USA, INC  
CANADA INTERNATIONAL TAX SVCS  
CAN-AM SALES GROUP LLC  
CANON FINANCIAL SERVICES  
CANON FINANCIAL SERVICES, INC.  
CAPITAL ADHESIVES & PACKAGING  
CORP.  
CATHY ACCOUNTING  
CENTRAL STEEL & WIRE  
CHEP USA  
CHICAGO COIL, LLC  
CHICAGO METROPOLITAN FIRE  
CHICAGO RIVET & MACHINE  
C-MIDWAY BUSINESS CENTER

CONCUR TECHNOLOGIES, INC.  
CONTINENTAL MARKETING, INC.  
CORTECH LLC  
CP REDLANDS III, LLC  
CRANE & NORCROSS  
CULLIGAN WATER CONDITIONING  
DAVID S. LAPINE, INC.  
DEL MAR MASTER FUND LTD  
DELAWARE DIVISIOM OF REVENUE  
DIEMOLD SERVICE CO  
DIGITAL BRANDWORKS  
DLDM INVESTMENT LIMITED  
DONGGUAN JANICA HOME  
PRODUCTS CORP.  
DUKES OIL SERVICE  
DUNN TRIMMING & BINDING  
EAGLE STEEL CORP.  
EDWARD SEGAL INC. (FKA AFT INC.)  
ELEMENT MATERIALS TECHNOLOGY  
ELGIN FASTENER GROUP, LLC  
ENGAGE2EXCEL  
ENGLEWOOD ELECTRIC  
ENRIQUEZ, MARICELA  
EPM SALES  
ERNESTO ANTONIO LOPEZ MURCIA  
ESTES EXPRESS LINES  
EVANS ADHESIVE CORPORATION  
EXHIBIT CONCEPTS  
F.A.S. PLASTIC ENTERPRISES, IN  
FILTER SERVICES ILLINOIS  
FLEX-PAC, INC.  
FOSHAN WOLONG CHEMICAL  
CO.,LTD  
GOODING RUBBER INC.  
GRAHAM HOLDINGS COMPANY  
D.B.A. MPS LLC  
GRAINGER  
GRAPHIC MEASURES, INC.  
GRIPP INCORPORATED  
GUERRA, RICARDO  
GUILIN DADI ARTS & CRAFTS CO.  
LTD.  
H.H. OMPS, INC.

HD SUPPLY INC.  
HERMELINDA CRUSENO  
HINCKLEY SPRING WATER CO  
HUSKY PARTS DIVISION  
HYDRADYNE  
IESCO, LLC  
IMS COMPANY  
INDIANA OXYGEN  
INDIANA-AMERICAN WATER  
COMPANY  
INGERSOLL-RAND  
INSULAR TRADING  
INTERNATIONAL BUSINESS MACHINE  
IT OUTLET, INC.  
J. MICHAEL FRISCHE, O.D., P.C.  
JACKSON COUNTY TREASURER  
JAY SCHUSTER  
JEFFREY C. RUBENSTEIN, AS  
TRUSTEE  
JJ'S HYDRAULIC SERVICE  
JPMORGAN CHASE BANK, N.A.  
JW PROPERTIES GROUP, LLC  
KANOPI STUDIOS  
KARL SALMON LLC  
KOIL METALS L.L.C.  
KROLL ASSOCIATES, INC.  
LABEL MAKER INC  
LEGACY PROFESSIONALS LLP  
LINDE GAS & EQUIPMENT INC. (FKA  
PRAXAIR)  
LUBE USA, INC  
LUNA, KATHERINE  
M. HOLLAND COMPANY  
MARK HOLLAND  
MARTIN & DROUGHT P.C.  
MECHANICAL FINISHERS INC, LLC  
MILLIKEN AND COMPANY  
MONITOR TECHNOLOGIES LLC  
MZI BUILDING SERVICES, INC  
NEAL, GERBER & EISENBERG LLP  
NEFF ENGINEERING COMPANY  
NEUCO INC  
NORDSON CORPORATION-JAYCEE

ORBITFORM GROUP  
ORKIN PEST CONTROL (IL)  
P & M MERCURY MECHANICAL CORP.  
PALLOGIC LLC  
PARALLEL DESIGN INC.  
PATTERSON ENGINEERING &  
MANUFACTURING LL  
PAX INDUSTRIES, INC.  
PCA- COLUMBUS  
PERFECTION SERVO INC.  
PIRTEK O'HARE  
PREMIER COMPANIES  
PROGRESSIVE COMPONENTS  
PRO-MET STEEL, INC.  
PROTOS TECHNOLOGIES, LLC  
PUMP SOLUTIONS  
R R DONNELLEY  
RADWELL INTERNATIONAL INC.  
RANGER ENTERPRISES  
REDDAWAY  
RELADYNE RELIABILITY SERVICES  
RPK ENTERPRISES  
RPM PLASTICS LLC  
RSM US LLP  
RUMPKE OF INDIANA  
RUTUES, DENNIS  
SAIA MOTOR FREIGHT LINE, INC.  
SESOTEC, INC.  
SEYMOUR MUNICIPAL SANITATION  
SHRED-IT USA LLC  
SIEMENS INDUSTRY, INC  
SIGNATURE SALES, INC.  
SMS GROUP, INC.  
SOUTHERN GRAPHIC SYSTEMS, LLC  
STAFFING INC.  
STANDARD TOOL & DIE, INC  
STANLEY CONVERGENT SECURITY  
SOLUTIONS  
STEWART'S LP GAS, INC.  
SUPPLYONE WISCONSIN LLC  
SUPPLYONE, INC  
SYCAMORE SALES ASSOCIATES  
T.J. SNOW COMPANY, INC.

T.L. ASHFORD AND ASSOCIATES  
TALCO PLASTICS, INC  
TDAK DEVELOPMENT, INC.  
TEAM ENERGY INC  
TEC ENGINEERING CORP.  
TED MOLD MANUFACTURER  
LIMITED  
TENNANT  
THE DOW CHEMICAL COMPANY  
THE TRAVELERS INDEMNITY  
COMPANY  
TIME SAVERS, INC.  
TODAY CARTAGE, INC  
TOMSON STEEL  
TYNAN EQUIPMENT COMPANY  
UL VERIFICATION SERVICES INC.  
UPS-SUPPLY CHAIN SOLUTIONS, INC.  
US MESSENGER & LOGISTICS, INC.  
USF HOLLAND MOTOR EXPRESS  
VIRGINIA STORAGE SERVICES, LLC  
WAREHOUSE DIRECT  
WASHINGTON STATE DEPT OF  
REVENUE  
WESTROCK CP, LLC  
WIRTZ RENTALS COMPANY  
WORKSHOP LIMITED INC.  
XEROX CORPORATION  
YU LONG KAI TAI(SANHE) TRADING  
CO., LTD.

**EXHIBIT 2**

Cozen has previously been adverse, or is currently adverse, to the following parties or their affiliates in matters unrelated to these Cases:

Praxair, Inc.  
Ace Hardware  
BP Lubricants USA, Inc.  
Canada Revenue Agency  
Canon USA, Inc.  
Culligan International Company  
Culligan of Canada ULC  
State of Delaware  
Grainger  
WW Grainger Inc.  
HD Supply, Inc.  
Indiana American Water Company, Inc.  
Ingersoll Rand  
IBM  
Kroll Inc.  
Praxair Inc.  
Neff Engineering  
Orkin  
Packaging Corporation of America  
RR Donnelley & Sons  
RPM international, Inc.  
RSM US LLP  
Rumpke  
Signature Sales, Inc.  
Standard Tool & Die, Inc.  
Stanley Convergent Security Solutions, Inc.  
State of Washington  
UL Verification Services, Inc.  
United Parcel Service  
USF Holland  
WestRock  
Xerox

Cozen has previously represented, or currently represents, the following parties or their affiliates in matters unrelated to these Cases. The following list may include parties (i) who are, or have been, an alleged insured under an insurance policy allegedly issued by an insurance company represented by Cozen, and (ii) current and former clients of Cozen's affiliated Public Strategies group and to whom Cozen does not provide legal services.

Kroll Properties, LLC  
Praxair, Inc.  
JPMorgan Chase Bank, N.A.  
Siemens Industry, Inc.  
The Dow Chemical Company  
Travelers Indemnity Company  
Neal Gerber & Eisenberg LLP  
Reddaay Manufacturing Co., Inc.  
Thomas Ace Hardware, Inc.  
Canon Medical Systems USA, Inc.  
Central Steel & Wire  
Concur Technologies Inc.  
DLDM Investment Limited  
Hinckley Water  
International Business Machines  
Premier Group of Companies  
SMS Siemag AG  
SupplyOne Tampa Bay, Inc.  
United Parcel Service  
WestRock  
Wirtz Corp Mundelein