

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

HRHI Wind-down, LLC, *et al.*,
Debtors.¹

Chapter 11

Case No. 25-10674 (TMH)

Jointly Administered

**DEBTORS' WITNESS AND EXHIBIT LIST
FOR AUGUST 28, 2025, HEARING**

The debtors and debtors in possession (the “Debtors”) in the above-captioned cases hereby submit this witness and exhibit list in connection with the hearing currently scheduled for August 28, 2025, at 2:00 p.m. (ET) (the “Hearing”).

WITNESSES

The Debtors designate the following individuals as a witness whose live testimony and/or declaration may be relied upon during the Hearing:

Name
Dustin Bernstein Managing Director Novo Advisors LLC
Michael Ragano Chief Restructuring Officer HRHI Wind-down, LLC DPM Wind-down, L.L.C. HRHP Wind-down, LLC SPC Wind-down, LLC

The Debtors also designate as witnesses individuals or representatives of any objecting party.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal EIN, are as follows: HRHI Wind-down, LLC (7913); DPM Wind-down, L.L.C. (1830); HRHP Wind-down, LLC (9937); and SPC Wind-down, LLC (7899). The Debtors’ mailing address is 200 W. Madison Street, Suite 1000, Chicago, IL 60606.

The Debtors intend to submit into evidence the following documents and reserve the right to supplement any declarations through live direct testimony of the witnesses at the Hearing:

Exhibit #	Description of Exhibit	Docket No.	Date
1.	Debtors' First Omnibus (Substantive) Objection to Certain 503(b)(9) Claims	<u>D.I. 316</u>	July 22, 2025
2.	Debtors' Second Omnibus (Non-Substantive) Objection to Certain 503(b)(9) Claims	<u>D.I. 317</u>	July 22, 2025
3.	El Paso Paper Box Inc. Preference Analysis – Preference Period/New Value Analysis (Payments January 8, 2025 through April 8, 2025)	N/A	N/A
4.	El Paso Paper Box Inc. Preference Analysis – Pre-Preference Period Payment Analysis	N/A	N/A
5.	El Paso Paper Box Inc. Preference Analysis – Combined New Value/Ordinary Course of Business Analysis	N/A	N/A
6.	Emails among Faye Skomer, Cynthia Velastegui, and Katie McCallion of Royal Paper and Ruben Rivero and Paul Malooly of El Paso Paper Box Company regarding past due balances (including attachments).	N/A	Mar. 13, 2025

7.	International Paper Company Preference Analysis – Preference Period/New Value Analysis (Payments January 8, 2025 through April 8, 2025)	N/A	N/A
8.	International Paper Company Preference Analysis – Pre-Preference Period Payment Analysis	N/A	N/A
9.	Email to Alison Watts of Royal Paper and Dustin Bernstein of Novo Advisors LLC from John Hehn of International Paper Company regarding new payment requirements for trucks	N/A	Feb. 14, 2025
10.	Email to Alison Watts of Royal Paper and Dustin Bernstein of Novo Advisors LLC from John Hehn of International Paper Company regarding aging (including attachments)	N/A	Feb. 17, 2025
11.	Email to Alison Watts of Royal Paper and Dustin Bernstein of Novo Advisors LLC from John Hehn of International Paper Company regarding confirmation of payment for release of trucks from warehouse (including attachments)	N/A	Mar. 3, 2025
12.	Email between John Hehn of International Paper Company and Dustin Bernstein of Novo Advisors LLC regarding March 2025 aging (including attachments)	N/A	Mar. 21, 2025

13.	Emails between Marlein Sabbah and John Hehn of International Paper Company and Dustin Bernstein of Novo Advisors LLC regarding payment for trucks	N/A	Apr. 7, 2025
14.	Emails between Marlein Sabbah and John Hehn of International Paper Company and Dustin Bernstein of Novo Advisors LLC regarding invoices and payment for trucks	N/A	Apr. 7, 2025
15.	Any and all documents listed on the Hearing Agenda including any declarations that are filed	N/A	N/A

RESERVATION OF RIGHTS

The Debtors reserve the right to amend or supplement the foregoing at any time prior to or during the Hearing. The Debtors further reserve the right to (i) cross-designate all witnesses and exhibits designated by any other party for the Hearing and seek to introduce any such exhibits into evidence, (ii) call any rebuttal and/or impeachment witnesses as necessary, (iii) examine or cross-examine any witness called by any other party at the Hearing, (iv) not introduce any exhibit identified herein, (v) seek to introduce all or a portion of any exhibit herein or on any other parties' exhibit list; (vi) object to the introduction into evidence of any exhibit, in whole or in part, by any party, whether or not identified herein, (vii) object to and/or seek to exclude the testimony of any witness, in whole or in part, whether or not identified herein; (viii) offer additional exhibits at the Hearing for purposes of impeachment, rebuttal or in response to evidence offered by any other party; and (ix) amend or supplement this witness and exhibit list.

Dated: August 25, 2025
Wilmington, Delaware

Respectfully submitted,

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Brianna N. V. Turner

Robert J. Dehney, Sr. (No. 3578)

Matthew O. Talmo (No. 6333)

Scott D. Jones (No. 6672)

Brianna N. V. Turner (No. 7468)

1201 N. Market Street, 16th Floor

Wilmington, Delaware 19801

Telephone: (302) 658-9200

Facsimile: (302) 658-3989

Email: rdehney@morrisnichols.com

mtalmo@morrisnichols.com

sjones@morrisnichols.com

bturner@morrisnichols.com

*Counsel to the Debtors and
Debtors in Possession*