

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

ZACHRY HOLDINGS, INC., *et al.*<sup>1</sup>

Reorganized Debtors.

)  
) Chapter 11  
)  
) Case No. 24-90377 (MI)  
)  
) (Jointly Administered)  
)

**HICKS THOMAS LLP'S FINAL FEE APPLICATION FOR ALLOWANCE  
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE  
PERIOD FROM MAY 21, 2024 THROUGH FEBRUARY 27, 2025**

<b>Name of Applicant:</b>	Hicks Thomas LLP	
<b>Applicant's Role in Case:</b>	Attorneys to the Debtors	
<b>Employment Order:</b>	July 10, 2024 [Docket No. 441] <i>Effective as of May 21, 2024</i>	
<b>Interim Application ( )      Final Final Application (X)</b>	<b>Beginning Date</b>	<b>End Date</b>
<b>Time period covered by this Application for which interim compensation has not previously been awarded:</b>	N/A	N/A
<b>Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case?</b>	Yes	
<b>Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed?</b>	Yes	
<b>Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases?</b>	Yes	
<b>Do expense reimbursements represent actual and necessary expenses incurred?</b>	Yes	

<sup>1</sup> The last four digits of Zachry Holdings, Inc.'s tax identification number are 6814. A complete list of each of the Reorganized Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Reorganized Debtors' claims and noticing agent at [www.veritaglobal.net/ZHI](http://www.veritaglobal.net/ZHI). The location of the Reorganized Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.



<b>Compensation Breakdown for the Third Interim Period Covered by This Application</b>	
<b>Total professional<sup>2</sup> fees requested in this Application:</b>	\$2,564,109.00
<b>Total professional hours covered by this Application:</b>	3,707.20
<b>Average hourly rate<sup>3</sup> for professionals:</b>	\$691.66
<b>Total paraprofessional<sup>4</sup> fees requested in this Application:</b>	\$128,875.00
<b>Total actual paraprofessional hours covered by this Application:</b>	528.80
<b>Average hourly rate for paraprofessionals:</b>	\$243.71
<b>Total fees requested in this Application:</b>	\$2,692,984.00
<b>Total expense reimbursements requested in this Application:</b>	\$13,707.94
<b>Total fees and expenses requested in this Application:</b>	\$2,706,691.94
<b>Total fees and expenses awarded in all prior Applications:</b>	\$2,706,691.94
<p><b>Plan Status:</b> On February 27, 2025, this Court entered an order confirming the Debtors' chapter <i>Further Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and Its Debtor Affiliates</i> [Docket No. 2362] (the "<b>Plan</b>"). On April 10, 2025, the Effective Date under the Plan occurred.</p>	
<p><b>Primary Benefits:</b> Hicks Thomas served as special litigation counsel to Debtors in connection with adversary proceedings including, <i>Zachry Industrial, Inc. v. Golden Pass LNG Terminal LLC</i>, Adv. Pro. No. 24-03105 (MI); <i>FLNG Liquefaction, LLC, et al. v. CB&amp;I, et al.</i>, Adv. Pro. No. 24-03195; <i>FLNG Liquefaction, LLC v. Zachry Industrial, Inc.</i>, Adv. Pro. No. 24-03189; <i>Allianz Global Risk US Insurance Co., et al. v. Zachry Industrial, et al.</i>, Adv. Pro. No. 24-03190; <i>Zachry Holdings, Inc. v. Omaha Public Power District</i>, Adv. Pro. No. 25-03025 (MI), as wells as objections to proofs of claims filed by Alfred Miller Contracting Co. [POC 1553], Orion Construction [POC 1422], Common Wealth Electric [POC 1003], IBM [POC 181], Fairway Methanol [POC 1323], Integrated Power [POC 45-1, 45-2], WARN Act Related Claims [Docket No. 2551], and other contested proceedings including motions to enforce the GPX settlement [Docket No. 1694] and other related discovery motions.</p>	

<sup>2</sup> Includes partners, counsel, associates, and staff attorneys.

<sup>3</sup> Average hourly rates in this Application are calculated by dividing total fees by total hours covered by this Application, and litigation risk consulting attendant to negotiation of the plan, rounded to the nearest whole dollar.

<sup>4</sup> Includes legal assistants and an e-discovery professional.

**If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this Application was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this Application was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

Hicks Thomas LLP (“**Hicks Thomas**”), attorneys for the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) in these chapter 11 cases, files this final application (this “**Application**”) for the period from May 21, 2024 to and including February 27, 2025 (the “**Final Period**”) requesting (i) final allowance of a total award of \$2,706,691.94 for the Final Period representing (a) compensation in the amount of \$2,692,984.00 for fees earned by Hicks Thomas for professional services to the Debtors during the Final Period, and (b) reimbursement of the actual and necessary expenses in the amount of \$13,707.94 incurred by Hicks Thomas during the Final Period in connection with such services; and (ii) payment of any unpaid amounts of such allowance. A proposed order in the form located on the Court’s website is attached hereto. In support of this Application, Hicks Thomas states as follows:

**Jurisdiction, Venue, and Predicates for Relief**

1. The United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding under 28 U.S.C. § 157(b). The Debtors confirm their consent to the entry of a final order by the Court.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The predicates for the relief requested herein are section 330 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “**Bankruptcy Code**”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), rule 2016-1 of the Bankruptcy Local Rules

for the Southern District of Texas (the “**Bankruptcy Local Rules**”), paragraphs 136–37 of the *Findings of Fact, Conclusions of Law, and Order (I) Approving the Debtors’ Disclosure Statement on a Final Basis and (II) Confirming the Further Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and Its Debtor Affiliates* [Docket No. 2431] (the “**Confirmation Order**”), Article II.B. of the Plan, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 342] (“**Compensation Procedures Order**”).

### **Procedural Background**

4. On May 21, 2024 (the “**Petition Date**”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned chapter 11 cases. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. These chapter 11 cases are being jointly administered pursuant to Bankruptcy Rule 1015(b). No party has requested the appointment of a trustee or examiner in these chapter 11 cases. On June 4, 2024, the Office of the United States Trustee for the Southern District of Texas (the “**U.S. Trustee**”) appointed the Statutory Unsecured Claimholders’ Committee (the “**Committee**”) [Docket No. 176].

5. A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to these chapter 11 cases, is set forth in the *Declaration of Mohsin Y. Meghji in Support of Debtors’ Petitions and Requests for First Day Relief* [Docket No. 7] and the Disclosure Statement.<sup>1</sup>

6. On July 9, 2024, the Court entered an order authorizing the retention of Hicks Thomas as counsel to the Debtors effective as of the Petition Date [Docket No. 440].

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Plan.

7. On June 25, 2024, the Court entered the Compensation Procedures Order, which set forth a procedure pursuant to which retained professionals, including Hicks Thomas, were: (1) to file monthly fee statements (each, a “**Monthly Fee Statement**”), including a detailed statement of services rendered and expenses incurred for that particular month, and serve same on certain parties; and (2) to file interim applications (each, an “**Interim Fee Application**”) covering approximately three-month long periods and serve same on certain parties.

8. Pursuant to the Compensation Procedures Order, Hicks Thomas filed and served Monthly Fee Statements and Interim Fee Applications as follows:

<b>Date Filed</b>	<b>Docket No.</b>	<b>Document</b>
07/24/2024	619	First Monthly Fee Statement
08/06/2024	705	Second Monthly Fee Statement
09/09/2024	922	Third Monthly Fee Statement
09/20/2024	999	First Interim Fee Application
10/26/2024	1174	Fourth Monthly Fee Statement
11/08/2024	1338	Fifth Monthly Fee Statement
12/05/2024	1629	Sixth Monthly Fee Statement
12/20/2024	1777	Second Interim Fee Application
01/13/2025	1913	Seventh Monthly Fee Statement
02/12/2025	2127	Eighth Monthly Fee Statement
03/05/2025	2481	Ninth Monthly Fee Statement
03/26/2025	2626	Third Interim Fee Application

9. In support of this Application, Second Interim Fee Application submits these Monthly Fee Statements and Interim Fee Application, which are incorporated herein by reference.

**Terms and Conditions of Employment and Compensation**

10. The terms and conditions of Hicks Thomas’s employment by the Debtors and compensation to be paid to Hicks Thomas by the Debtors are specifically outlined in the *Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of Hicks Thomas LLP as Attorneys to the Debtors Effective as of the Petition Date* [Docket No. 770] (the “**Retention**

**Application**”). Postpetition compensation paid to Hicks Thomas by the Debtors has been paid from the Debtors’ estates, in accordance with the Compensation Procedures Order.

**Professional Services Provided by Hicks Thomas to the Debtors**

11. Hicks Thomas has assisted the Debtors in all matters in these chapter 11 cases. In support of this Application, Hicks Thomas submits the following:

- For the Final Period:
  - A summary of hours expended and fees earned grouped by timekeeper attached hereto as **Exhibit A**.
  - A summary of hours expended and fees earned grouped by project category attached hereto as **Exhibit B**.
  - A summary of hours expended and fees earned grouped by project category and by timekeeper attached hereto as **Exhibit C**.
  - A summary of hours expended and fees earned grouped by timekeeper attached hereto as **Exhibit D**.

12. The following is a summary, by matter, of the most significant professional services provided by Hicks Thomas to the Debtors during the Final Period.

- **Golden Pass Project Litigation**

Hicks Thomas represented Debtor Zachry Industrial, Inc. (ZII) in the adversary proceeding styled *Zachry Industrial, Inc. v. Golden Pass LNG Terminal LLC*, Adv. Pro. No. 24-03105 (MI) (the “**ZII Litigation**”). Through the ZII Litigation, ZII sought to avoid multiple agreements and contract amendments that defendant Golden Pass LNG Terminal LLC (“**Golden Pass**”) induced through inequitable conduct and to recover more than \$1 billion in consideration given to Golden Pass in these transactions without receiving reasonably equivalent value in return. Hicks Thomas also assisted in contesting Golden Pass’s attempts to compel acceptance or rejection of the parties’ contract in the bankruptcy [Docket No. 299]. Through its aggressive prosecution of ZII’s claims, Hicks Thomas was instrumental in resolving the Golden Pass dispute, which the Court approved

on August 12, 2024. The Golden Pass dispute was the precipitating cause of Zachry's bankruptcy, and its successful resolution paved the way for Debtor's successful exit from bankruptcy.

Based on Hicks Thomas's involvement in the Golden Pass dispute, it also represented Debtors in ZII's objections to proofs of claims filed by Alfred Miller Contracting [POC 1553] and Orion Construction [POC 1422].

- **Freeport LNG Litigation**

Hicks Thomas represented Debtor Zachry Industrial, Inc. in separate adversary proceedings related to the Freeport Liquified Natural Gas (FLNG) facility in which FLNG and its insurers sought \$1.5 billion arising out of an explosion at the FLNG facility (Adversary Nos. 24-03189 and 24-03190) (collectively the "**FLNG Explosion Cases**") and more than \$450 million arising out of General Electric manufactured compression motors at the Facility (Adversary No. 24-03195) ("**FLNG GE Motor Case**"). Hicks Thomas obtained a complete dismissal of the FLNG Explosion Cases extinguishing \$1.5 billion in potential liability. Hicks Thomas also obtained summary judgment on \$400 million of consequential damages claims in the FLNG GE Motor Case.

- **Omaha Public Power Department Project Disputes**

Hicks Thomas represents ZII in various disputes arising out of the Omaha Public Power Department (OPPD) construction project, which has experienced numerous delays due to reasons beyond Zachry's control and resulted in claims exceeding \$50 million. In Adversary Proceeding 24-90377, Hicks Thomas has orchestrated ZII's effort to invalidate more than \$40 million in improper liquidated damages sought by OPPD for delays in the completion of construction on two electrical power generation plants. Hicks Thomas was also chosen by Debtors to represent ZII in the most significant and contentious vendor disputes arising from the OPPD project, including

Proofs of Claim 181 and 1003. Hicks Thomas has also advised Zachry on the enforcement of its contractual rights in numerous disputes with OPPD as Zachry completes the project. The detailed descriptions demonstrate that Hicks Thomas was heavily involved in performing services for the Debtors on a daily basis, to meet the needs of the Debtors' estates in these chapter 11 cases.

13. In the ordinary course of Hicks Thomas's practice, Hicks Thomas maintains a record of expenses incurred in the rendition of professional services required by the Debtors and their estates for which reimbursement is sought. As noted above, a summary of Hicks Thomas's expenses for the Final Period is attached as **Exhibit D**. The expenses incurred for which Hicks Thomas seeks reimbursement include, but are not limited to, filing fees, travel expenses (including airfare, hotel, and taxis), and meals. These charges are intended to reimburse Hicks Thomas's direct operating costs, which are not incorporated into Hicks Thomas's hourly billing rates. Hicks Thomas charges external costs at the vendor's cost without markup.

#### **Legal Analysis for Allowance of Compensation and Reimbursement of Expenses**

14. By this Application, Hicks Thomas seeks allowance of compensation for professional services rendered in the amount of \$2,692,984.00 and reimbursement of actual and necessary expenses in the amount of \$13,707.94 that Hicks Thomas incurred for the Final Period. The blended rate of all Hicks Thomas timekeepers in this Application for the Final Period is \$2,706,691.94. In support of the Application, Hicks Thomas submits its prior Monthly Fee Statements and Interim Fee Applications, which are incorporated herein by reference.

15. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:



In determining the amount of reasonable compensation to be awarded, the court should consider the nature, extent, and the value of such services, taking into account all relevant factors, including—

- (a) the time spent on such services;
- (b) the rates charged for such services;
- (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- (e) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

16. This Application readily meets the standards of section 330 and applicable case law for compensation for services rendered on behalf of the Debtors' estates and for the administration of these chapter 11 cases.

17. As a result of its representation of the Debtors in these chapter 11 cases, Hicks Thomas incurred expenses which it billed to the Debtors' estates. The disbursements for such services are not included in Hicks Thomas's overhead for the purpose of setting billing rates and Hicks Thomas has made every effort to minimize its disbursements in these chapter 11 cases. The actual expenses incurred in providing professional services were necessary, reasonable, and justified under the circumstances to serve the needs of the Debtors in these chapter 11 cases. Among other things, Hicks Thomas makes sure that all expenses for which it seeks reimbursement were reasonable and appropriate.

18. In conclusion, the services provided by Hicks Thomas have been necessary to the administration of the Debtors' estates in the Final Period, and beneficial at the time at which the services were rendered toward the successful prosecution of the Debtors' cases. Further, Hicks

Thomas performed the services within a reasonable amount of time commensurate with the complexity, importance, nature of the problems, issues, and tasks addressed on behalf of the Debtors' estates. Finally, the compensation sought is reasonable based on the customary compensation charged by comparably skilled practitioners in bankruptcy cases filed in this district. Hicks Thomas requests that the Court determine that the nature, extent, and value of these services were appropriate under the circumstances at the time the services were rendered.

19. Although Hicks Thomas has made every effort to include all fees earned and expenses incurred during the Final Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Final Period. Hicks Thomas reserves the right to make further applications to this Court for allowance of such fees and expenses not included herein. Subsequent applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, the Compensation Procedures Order, the Confirmation Order, and Plan.

WHEREFORE, Hicks Thomas requests that the Court enter an order, substantially in the form attached hereto, granting final allowance of and payment of any unpaid portion of (a) compensation for professional services to the Debtors in the amount of \$2,692,984.00 for fees earned by Hicks Thomas for professional services to the Debtors during the Final Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by Hicks Thomas during the Final Period in connection with such services in the amount of \$13,707.94, for a total award of \$2,706,691.94 for the Final Period.

*[remainder of page left intentionally blank]*

Dated: April 18, 2025  
Houston, Texas

Respectfully submitted,

**HICKS THOMAS LLP**

By: /s/ John B. Thomas

John B. Thomas, Attorney-in-Charge

Southern District Bar No. 10675

**HICKS THOMAS, LLP**

700 Louisiana, Suite 2300

Houston, Texas 77002

(713) 547-9100

(713) 547-9150 (Facsimile)

**Certificate of Service**

I certify that on April 18, 2025, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster

Charles R. Koster

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
ZACHRY HOLDINGS, INC., <i>et al.</i> <sup>1</sup>	)	
	)	Case No. 24-90377 (MI)
Debtors.	)	(Jointly Administered)
	)	

**FINAL ORDER ALLOWING COMPENSATION  
AND REIMBURSEMENT OF EXPENSES  
(Docket No. \_\_\_\_)**

The Court has considered the final application for compensation and reimbursement of expenses filed by Hicks Thomas LLP (the “Applicant”). The Court orders:

1. The Applicant is allowed compensation and reimbursement of expenses in the amount of \$2,706,691.94 for the period set forth in the application.
2. The compensation and reimbursement of expenses allowed in this order and all previous interim allowances of compensation and reimbursement of expenses are approved on a final basis.
3. The Reorganized Debtors are authorized to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

\_\_\_\_\_  
MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

<sup>1</sup> The last four digits of Zachry Holdings, Inc.’s tax identification number are 6814. A complete list of each of the Reorganized Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at [www.veritaglobal.net/ZHI](http://www.veritaglobal.net/ZHI). The location of the Reorganized Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

**EXHIBIT A**

## Exhibit A

## Summary of Total Fees and Hours by Matter for Attorneys and Paraprofessionals

Timekeeper Name	Timekeeper Type	Year Admitted	Areas of Expertise	Hours	Rate	Fees
John B. Thomas	Partner	1987	Commercial Litigation Practice	1063.00	\$950	\$1,009,850.00
Stephen M. Loftin	Partner	1990	Commercial Litigation Practice	14.40	\$875	\$12,600.00
John J. Deis	Partner	2000	Commercial Litigation Practice	1110.00	\$675	\$749,250.00
J. Stephen Barrick	Partner	1996	Commercial Litigation Practice	36.60	\$750	\$27,450.00
Eric A. Grant	Partner	1990	Commercial Litigation Practice	152.60	\$750	\$114,450.00
Brian Pidcock	Partner	2010	Commercial Litigation Practice	54.50	\$675	\$36,787.50
Cameron Pope	Partner	2001	Commercial Litigation Practice	112.90	\$675	\$76,207.50
Jay N. Gross	Sr. Counsel	1985	Commercial Litigation Practice	91.30	\$540	\$49,302.00
Chris J. Richart	Sr. Counsel	2001	Commercial Litigation Practice	5.10	\$750	\$3,825.00
D. Ryan Cordell	Associate	2018	Commercial Litigation Practice	487.60	\$525	\$255,990.00
Kevin C. Mrsny	Associate	2022	Commercial Litigation Practice	1.20	\$525	\$630.00
Mariana L. Jantz	Associate	2020	Commercial Litigation Practice	156.90	\$435	\$68,251.50
Sofia C. Burnett	Associate	2023	Commercial Litigation Practice	346.10	\$350	\$121,135.00
Raymond Chang	Associate	2007	Commercial Litigation Practice	8.70	\$525	\$4,567.50
Stacie J. Osborn	Associate	2020	Commercial Litigation Practice	64.20	\$510	\$32,742.00
Jessica N. Wahl	Associate	2016	Commercial Litigation Practice	2.10	\$510	\$1,071.00
Brenton Wochnick	Paralegal			30.20	\$250	\$7,550.00
Jennifer R. Baker	Paralegal			361.80	\$250	\$90,450.00
Jeanie M. Loper	Paralegal			124.90	\$225	\$28,102.50
J. Maurice Taylor	Paralegal			3.80	\$250	\$950.00
Angela Zambrano	Paralegal			1.30	\$225	\$292.50
Juan Yznaga	Paralegal			6.80	\$225	\$1,530.00
Grand Total				4236.00		\$2,692,984.00

**EXHIBIT B**



**Exhibit B****In re: Zachry Bankruptcy: Contested Matters****Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	259.80	\$ 190,372.00
L120	Analysis/Strategy	369.60	\$ 241,518.50
L130	Experts/Consultants	7.90	\$ 6,842.50
L140	Document/File Management	205.30	\$ 55,660.50
L160	Settlement/Non-Binding ADR	19.10	\$ 11,890.50
L190	Other Case Assessment, Development & Administration	47.80	\$ 29,285.00
L210	Pleadings	123.30	\$ 61,702.50
L230	Court Mandated Conferences	24.40	\$ 15,601.00
L240	Dispositive Motions	9.30	\$ 6,717.50
L250	Other Written Motions and Submissions	283.20	\$ 200,525.00
L310	Written Discovery	112.80	\$ 68,446.50
L320	Document Production	269.80	\$ 133,371.00
L330	Depositions	79.20	\$ 51,902.50
L350	Discovery Motions	3.40	\$ 2,295.00
L390	Other Discovery	16.90	\$ 13,510.00
L430	Written Motions and Submissions	38.60	\$ 21,687.50
L440	Other Trial Preparation and Support	17.00	\$ 16,150.00
L450	Trial and Hearing Attendance	8.30	\$ 7,545.00
E118	Litigation support vendors		\$ 513.78
<b>Totals</b>		<u>1,895.70</u>	<u>\$ 1,135,536.28</u>

**IBM: Alvarez & Marsal Holdings, LLC**  
**Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development		
L120	Analysis/Strategy	1.90	\$ 1,282.50
L140	Document/File Management		
L160	Settlement/Non-Binding ADR		
L190	Other Case Assessment, Development & Admin		
L210	Pleadings		
L250	Other Written Motions and Submissions		
<b>Totals</b>		<u>1.90</u>	<u>\$ 1,282.50</u>

**Commonwealth Electric Company**  
**Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>	
L110	Fact Investigation/Development	25.10	\$	17,962.50
L120	Analysis/Strategy	25.40	\$	19,082.50
L140	Document/File Management	2.60	\$	650.00
L160	Settlement/Non-Binding ADR	2.10	\$	1,957.50
L190	Other Case Assessment, Development & Admin	2.90	\$	2,257.50
L210	Pleadings	6.10	\$	4,067.50
L250	Other Written Motions and Submissions	21.40	\$	15,025.00
L320	Document Production	0.40	\$	100.00
L390	Other Discovery	1.20	\$	810.00
<b>Totals</b>		<u>87.20</u>	<u>\$</u>	<u>61,912.50</u>

**SEC Investigation  
Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	33.90	\$ 15,634.50
L120	Analysis/Strategy	17.80	\$ 10,820.00
L140	Document/File Management	21.90	\$ 6,640.00
L160	Settlement/Non-Binding ADR		
L190	Other Case Assessment, Development & Admin		
L210	Pleadings		
L250	Other Written Motions and Submissions	0.50	\$ 337.50
L310	Written Discovery	0.20	\$ 135.00
L320	Document Production	70.90	\$ 29,947.50
L390	Other Discovery		
		<b>Totals</b>	
		<u>145.20</u>	<u>\$ 63,514.50</u>

**Zachry Bankruptcy Contested Matters - Employee Claims**  
**Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	1.70	\$ 739.50
L120	Analysis/Strategy	19.20	\$ 9,720.00
L140	Document/File Management	1.50	\$ 375.00
L210	Pleadings	10.20	\$ 4,559.50
L240	Dispositive Motions	10.50	\$ 5,512.50
L250	Other Written Motions and Submissions	56.00	\$ 24,765.00
L310	Written Discovery	3.70	\$ 1,942.50
L330	Depositions	0.20	\$ 105.00
L430	Written Motions and Submissions	38.50	\$ 20,158.50
L450	Trial & Hearing Attendance	1.50	\$ 697.50
<b>Totals</b>		<u>143.00</u>	<u>\$ 68,575.00</u>

**Project Goal Post  
Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	143.80	\$ 98,292.50
L120	Analysis/Strategy	426.70	\$ 295,911.00
L130	Experts/Consultants	27.70	\$ 19,177.50
L140	Document/File Management	27.30	\$ 9,102.50
L160	Settlement/Non-Binding ADR	63.50	\$ 50,880.00
L190	Other Case Assessment, Development & Administration	10.30	\$ 8,392.50
L210	Pleadings	56.60	\$ 38,542.50
L230	Court Mandated Conferences	1.90	\$ 1,282.50
L240	Dispositive Motions	0.60	\$ 405.00
L250	Other Written Motions and Submissions	21.70	\$ 15,370.00
L310	Written Discovery	6.10	\$ 4,970.08
L320	Document Production	15.30	\$ 4,567.50
L330	Depositions		
L340	Expert Discovery	4.20	\$ 2,019.00
L350	Discovery Motions		
L390	Other Discovery	2.60	\$ 2,470.00
L420	Expert Witnesses	5.20	\$ 1,995.00
L430	Written Motions and Submissions	1.20	\$ 3,465.00
L440	Other Trial Preparation and Support	5.60	\$ 5,320.00
L450	Trial and Hearing Attendance	17.70	\$ 16,815.00
L680	Presentation	7.80	\$ 5,265.00
E118	Litigation support vendors		\$ 7,099.50
E112	Court Fees		
E118	Litigation support vendors		
<b>Totals</b>		<u>845.80</u>	<u>\$ 591,342.08</u>

**In Re: FLNG Explosion Litigation**  
**Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	38.80	\$ 26,015.00
L120	Analysis/Strategy	78.50	\$ 62,330.00
L130	Experts/Consultants	1.00	\$ 950.00
L140	Document/File Management	22.80	\$ 5,347.50
L160	Settlement/Non-Binding ADR	3.20	\$ 2,847.50
L190	Other Case Assessment, Development & Administration	8.40	\$ 5,985.00
L210	Pleadings	49.80	\$ 33,255.00
L230	Court Mandated Conferences	1.70	\$ 1,162.50
L240	Dispositive Motions	163.00	\$ 124,705.00
L250	Other Written Motions and Submissions	33.80	\$ 25,025.00
L310	Written Discovery	3.80	\$ 1,995.00
L390	Other Discovery	0.60	\$ 405.00
L430	Written Motions Submissions	47.50	\$ 25,365.00
L460	Post-Trial Motions and Submissions	0.20	\$ 150.00
L510	Appellate Motions & Submissions	4.60	\$ 4,170.00
E118	Litigation support vendors		\$ 657.66
E118	Court Fees		\$ 810.00
<b>Totals</b>		<u>457.70</u>	<u>\$ 321,175.16</u>

**In Re: FLNG re: GE Motors, Adv. No. 24-3195****Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	24.50	\$20,570.00
L120	Analysis/Strategy	179.40	\$119,864.00
L130	Experts/Consultants	8.90	\$7,602.50
L140	Document/File Management	13.00	\$3,052.50
L160	Settlement/Non-Binding ADR	20.30	\$18,617.50
L190	Other Case Assessment, Development & Administration	17.30	\$10,729.50
L210	Pleadings	33.20	\$19,160.00
L230	Court Mandated Conferences	4.70	\$3,172.50
L240	Dispositive Motions	295.60	\$219,957.00
L250	Other Written Motions and Submissions	10.30	\$7,380.00
L310	Written Discovery	3.60	\$2,130.00
L320	Document Production	17.50	\$7,772.50
L330	Depositions	3.20	\$1,097.50
L340	Expert Discovery	0.80	\$760.00
L350	Discovery Motions		
L390	Other Discovery	2.00	\$1,305.00
L420	Expert Witnesses		
L430	Written Motions and Submissions	17.90	\$9,397.50
L440	Other Trial Preparation and Support		
L450	Trial and Hearing Attendance	6.70	\$6,159.00
L680	Presentation		
E112	Court Fees	0.00	\$0.00
E118	Litigation support vendors	0.00	\$0.00
<b>Totals</b>		<u>658.90</u>	<u>\$458,727.00</u>



**All Matters**  
**Task Code Summary**

<u>Task Code</u>	<u>Task Code Description</u>	<u>Hours</u>	<u>Amount</u>
L110	Fact Investigation/Development	527.60	\$369,586.00
L120	Analysis/Strategy	1,118.50	\$760,528.50
L130	Experts/Consultants	45.50	\$34,572.50
L140	Document/File Management	294.40	\$80,828.00
L160	Settlement/Non-Binding ADR	108.20	\$86,193.00
L190	Other Case Assessment, Development & Administration	86.70	\$56,649.50
L210	Pleadings	279.20	\$161,287.00
L230	Court Mandated Conferences	32.70	\$21,218.50
L240	Dispositive Motions	479.00	\$357,297.00
L250	Other Written Motions and Submissions	426.90	\$288,427.50
L310	Written Discovery	130.20	\$79,619.00
L320	Document Production	373.90	\$175,758.50
L330	Depositions	82.60	\$53,105.00
L340	Expert Discovery	7.40	\$4,039.00
L350	Discovery Motions	6.00	\$4,765.00
L390	Other Discovery	20.70	\$16,030.00
L420	Expert Witnesses	2.10	\$1,995.00
L430	Written Motions and Submissions	144.40	\$78,813.50
L440	Other Trial Preparation and Support	17.00	\$16,150.00
L450	Trial and Hearing Attendance	25.60	\$23,046.50
L460	Post-Trial Motions and Submissions	0.20	\$150.00
L510	Appellate Motions & Submissions	4.60	\$4,170.00
L680	Presentations	22.00	\$18,755.00
E112	Court Fees		\$1,215.00
E118	Litigation support vendors		\$7,865.94
<b>Totals</b>		<u>4,235.40</u>	<u>\$2,702,064.94</u>

**EXHIBIT C**

## Exhibit C

## Summary of Total Fees and Hours by Attorneys and Paraprofessionals

Matter Name	Attorney Name	Hours	Rate	Fees
IBM: Alvarez	Brian Pidcock	1.90	\$675	\$1,282.50
Grand Total		1.90		\$1,282.50

Matter Name	Attorney Name	Hours	Rate	Fees
SEC Investigation	John B. Thomas	19.30	\$950	\$18,335.00
	John J. Deis	11.20	\$675	\$7,560.00
	Mariana L. Jantz	16.70	\$435	\$7,264.50
	Sofia C. Burnett	60.00	\$350	\$21,000.00
	Brenton Wochnick	0.10	\$250	\$25.00
	Jennifer R. Baker	32.10	\$250	\$8,025.00
	Jeanie M. Loper	5.80	\$225	\$1,305.00
Grand Total		145.20		\$63,514.50

Matter Name	Attorney Name	Hours	Rate	Fees
Project Goal Post	John B. Thomas	299.00	\$950	\$284,050.00
	John J. Deis	287.10	\$675	\$193,792.50
	Stehen M. Loftin	0.00	\$750	\$0.00
	J. Stephen Barrick	21.00	\$750	\$15,750.00
	Eric A. Grant	12.10	\$750	\$9,075.00
	Brian Pidcock	12.70	\$675	\$8,572.50
	Cameron Pope	0.90	\$675	\$607.50
	D. Ryan Cordell	13.10	\$525	\$6,877.50
	Mariana L. Jantz	24.00	\$435	\$10,440.00
	Sofia C. Burnett	116.30	\$350	\$40,705.00
	Jennifer R. Baker	33.10	\$250	\$8,275.00
	Jeanie M. Loper	27.10	\$225	\$6,097.50
Grand Total		846.40		\$584,242.50

Matter Name	Attorney Name	Hours	Rate	Fees
Commonwealth Electric	John B. Thomas	19.10	\$950	\$18,145.00
Company	Stephen M. Loftin	7.90	\$875	\$6,912.50
	John J. Deis	41.10	\$675	\$27,742.50
	D. Ryan Cordell	15.10	\$525	\$7,927.50
	Mariana L. Jantz	1.00	\$435	\$435.00
	Jennifer R. Baker	3.00	\$250	\$750.00
Grand Total		87.20		\$61,912.50

Matter Name	Attorney Name	Hours	Rate	Fees
FLNG Explosion Litigation	John B. Thomas	134.50	\$950	\$127,775.00
	Stephen M. Loftin	2.80	\$875	\$2,450.00
	John J. Deis	68.40	\$675	\$46,170.00
	J. Stephen Barrick	7.30	\$750	\$5,475.00
	Eric A. Grant	62.60	\$750	\$46,950.00
	Brian Pidcock	4.10	\$675	\$2,767.50
	Cameron Pope	44.70	\$675	\$30,172.50
	D. Ryan Cordell	85.40	\$525	\$44,835.00
	Sofia C. Burnett	14.90	\$350	\$5,215.00
	Brenton Wochnick	4.80	\$250	\$1,200.00
	Jennifer R. Baker	13.70	\$250	\$3,425.00
	Jeanie M. Loper	14.10	\$225	\$3,172.50
	J. Maurice Taylor	0.40	\$250	\$100.00
Grand Total		457.70		\$319,707.50

Matter Name	Attorney Name	Hours	Rate	Fees
Zachry Bankruptcy:	John B. Thomas	391.20	\$950	\$371,640.00
Contested Matters	Stephen M. Loftin	3.70	\$875	\$3,237.50
	John J. Deis	573.20	\$675	\$386,910.00
	J. Stephen Barrick	8.30	\$750	\$6,225.00
	Eric A. Grant	28.70	\$750	\$21,525.00
	Brian Pidcock	33.40	\$675	\$22,545.00
	Cameron Pope	9.60	\$675	\$6,480.00
	Chris J. Richart	5.10	\$750	\$3,825.00
	Jay N. Gross	8.50	\$540	\$4,590.00
	D. Ryan Cordell	233.00	\$525	\$122,325.00
	Mariana L. Jantz	43.90	\$435	\$19,096.50
	Stacie Osborn	51.60	\$510	\$26,316.00
	Raymond Chang	8.70	\$525	\$4,567.50
	Sofia C. Burnett	147.30	\$350	\$51,555.00
	Brenton Wochnick	25.30	\$250	\$6,325.00
	Jennifer R. Baker	253.20	\$250	\$63,300.00
	Jeanie M. Loper	65.80	\$225	\$14,805.00
	J. Maruice Taylor	3.40	\$250	\$850.00
	Juan Yznaga	6.80	\$225	\$1,530.00
Grand Total		1900.70		\$1,137,647.50

Matter Name	Attorney Name	Hours	Rate	Fees
FLNG re: GE Motors	John B. Thomas	199.90	\$950	\$189,905.00
	John J. Deis	129.00	\$675	\$87,075.00
	Eric A. Grant	49.20	\$750	\$36,900.00
	Brian Pidcock	2.40	\$675	\$1,620.00
	Cameron Pope	57.70	\$675	\$38,947.50
	Jay N. Gross	82.80	\$540	\$44,712.00
	D. Ryan Cordell	66.50	\$525	\$34,912.50
	KevinC. Mrsny	1.20	\$525	\$630.00
	Mariana L. Jantz	12.20	\$435	\$5,307.00
	Sofia C. Burnett	7.60	\$350	\$2,660.00
	Stacie J. Osborn	7.20	\$510	\$3,672.00
	Jessica N. Wahl	2.10	\$510	\$1,071.00
	Jennifer R. Baker	22.70	\$250	\$5,675.00
	Jeanie M. Loper	12.10	\$225	\$2,722.50
	Angela Zambrano	1.30	\$225	\$292.50
Grand Total		653.90		\$456,102.00

Matter Name	Attorney Name	Hours	Rate	Fees
Zachry Bankruptcy:	D. Ryan Cordell	74.50	\$525	\$39,112.50
Contested Matters -	Mariana L. Jantz	59.10	\$435	\$25,708.50
Employee Claims	Stacie J. Osborn	5.40	\$510	\$2,754.00
	Jennifer R. Baker	4.00	\$250	\$1,000.00
Grand Total		143.00		\$68,575.00

**Exhibit D**

## Exhibit D

## Summary Statement of Expenses

Category	Amount
Filing Fees	\$ 1,565.00
Litigation Support Vendors	\$ 11,374.50
Cimplifi, LLC - Data Hosting	\$ 744.94
Search TX - Records	\$ 23.50
<b>Grand Total</b>	<b>\$ 13,707.94</b>



Corporations Section  
P.O.Box 13697  
Austin, Texas 78711-3697



Jane Nelson  
Secretary of State

Office of the Secretary of State  
Packing Slip

June 24, 2024

Page 1 of 1

Attn: Tina Russell  
Tina Russell  
700 Louisiana, Suite 2300  
Houston, TX 77002

Batch Number: 137508123

Batch Date: 06-24-2024

Client ID: 29362719

Return Method: Email

1629-16226 (Zachry Ind. - Do Not Bill)

Document Number	Document Detail	Number / Name	Page Count	Fee
1375081230002	Find	Commonwealth company of the midwest		\$1.00
1375081230003	Find	Commonwealth company of the midwest		\$1.00
				<hr/> \$2.00

**Total Amount Charged to Client Account:** \$2.00  
(Applies to documents or orders where Client Account is the payment method)

*Note to Customers Paying by Client Account:* This is not a bill. Payments to your client account should be based on the monthly statement and not this packing slip. Amounts credited to your client account may be refunded upon request. Refunds (if applicable) will be processed within 10 business days.

User ID: WEBSUBSCRIBER

Come visit us on the Internet @ <https://www.sos.texas.gov/>

Phone: (512) 463-5555

FAX: (512) 463-5709

Dial: 7-1-1 for Relay Services

5/21/24, 11:55 AM

Mail - Racheal Reyes - Outlook

**FW: Pay.gov Payment Confirmation: TEXAS SOUTHERN BANKRUPTCY COURT**

Jackie Marlowe <jmarlowe@hicks-thomas.com>

Tue 5/21/2024 11:51 AM

To: Racheal Reyes <rreyes@hicks-thomas.com>

Racheal --

This is fee for filing Adversary Complaint in Zachry matter (Golden Pass) -- we seem to have done something with the matter number, I need to confirm

Jackie Marlowe  
Legal Assistant  
700 Louisiana, Suite 2300  
Houston, TX 77002

713-547-9105  
office

713-547-9150  
fax

jmarlowe@hicks-thomas.com

[www.hicks-thomas.com](http://www.hicks-thomas.com)

-----Original Message-----

From: do\_not\_reply@psc.uscourts.gov <do\_not\_reply@psc.uscourts.gov>

Sent: Tuesday, May 21, 2024 11:18 AM

To: Jackie Marlowe <jmarlowe@hicks-thomas.com>

Subject: Pay.gov Payment Confirmation: TEXAS SOUTHERN BANKRUPTCY COURT

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Your payment has been successfully processed and the details are below. If you have any questions or you wish to cancel this payment, please contact: Financial Services Group at 713-250-5875.

Account Number: 5197585  
Court: TEXAS SOUTHERN BANKRUPTCY COURT  
Amount: \$350.00  
Tracking Id: C25303759  
Approval Code: 141510  
Card Number: \*\*\*\*\*5027  
Date/Time: 05/21/2024 12:18:10 ET

NOTE: This is an automated message. Please do not reply



Receipt for Order 3F17294A

Order Date: 7/4/2024

Order Number: 3F17294A

Client Reference Number: 2162.16230

Documents: 11 (53 Pages)

Order Total: \$12.25

Document Purchases are Available Until: 8/3/2024

Documents Purchased	Price
1. #286619 - Served 6/21/2024.pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.00
2. #286612 - Zachry Industrial, Inc. - Served 06/17/2024 at 2:45 PM.pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.00
3. Process Request (8).pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.00
4. Plaintiffs' Original Petition.pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.90
5. Case Information Sheet.pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.00
6. #286616 - served on 6/17/2024 @2:45PM.pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.00
7. 286618 served on 6-17-2024.pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.00
8. #286614 - JVIC Demerger Fabrication, Inc. - Served 06/17/2024 at 2:45 PM.pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.00
9. #286615 - Zachry Enterprise Solutions Demerger, Inc. - Served 06/17/2024 at 2:45 PM.pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.00
10. #286617 - served on 6/17/2024 @2:45PM.pdf FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a. McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc. Brazoria County - District Clerk	\$1.00
11. 286618 served on 6-17-2024.pdf	\$1.00

FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC vs. Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; Zachry Enterprise Solutions Demerger, Inc.; CB&I, LLC n/k/a McDermott International, LTD.; Chiyoda International Corporation; and PSRG, Inc.  
Brazoria County - District Clerk

11 Documents: \$11.90  
Credit Card Processing Fee: \$0.35  
Total: \$12.25

**Payment Method**  
AMEX ending in 4038

**User**  
jyznaga@hicks-thomas.com

**Credit Card Transaction**  
AMEX ending in 4038 7/4/2024: \$12.25



Receipt for Order 0583B1B2

Order Date: 7/4/2024

Order Number: 0583B1B2

Client Reference Number: 2162.16230

Documents: 8 (45 Pages)

Order Total: \$9.25

Document Purchases are Available Until: 8/3/2024

Documents Purchased	Price
1. #286699 - PSRG, Inc. - Served 06/14/2024 at 1:34 PM.pdf Allianz Global Risks US Insurance Co. et al vs. Zachary Holdings LTD, et al Brazoria County - District Clerk	\$1.00
2. Plaintiffs' Original Petition.pdf Allianz Global Risks US Insurance Co. et al vs. Zachary Holdings LTD, et al Brazoria County - District Clerk	\$1.90
3. Process Requests (8).pdf Allianz Global Risks US Insurance Co. et al vs. Zachary Holdings LTD, et al Brazoria County - District Clerk	\$1.00
4. (#286656) Served 06/13/2024.pdf Allianz Global Risks US Insurance Co. et al vs. Zachary Holdings LTD, et al Brazoria County - District Clerk	\$1.00
5. (#286652) Served 06/13/2024.pdf Allianz Global Risks US Insurance Co. et al vs. Zachary Holdings LTD, et al Brazoria County - District Clerk	\$1.00
6. (#286658) Served 06/13/2024.pdf Allianz Global Risks US Insurance Co. et al vs. Zachary Holdings LTD, et al Brazoria County - District Clerk	\$1.00
7. (#286654) Served 06/13/2024.pdf Allianz Global Risks US Insurance Co. et al vs. Zachary Holdings LTD, et al Brazoria County - District Clerk	\$1.00
8. #286653 - Zachary Industries, Inc - Served 06/13/2024 at 2:20 PM.pdf Allianz Global Risks US Insurance Co. et al vs. Zachary Holdings LTD, et al Brazoria County - District Clerk	\$1.00

8 Documents: \$8.90

Credit Card Processing Fee: \$0.35

**Total: \$9.25**

**Payment Method**

AMEX ending in 4038

**User**

jyznaga@hicks-thomas.com

**Credit Card Transaction**

AMEX ending in 4038: 7/4/2024: \$9.25



**Jackie Marlowe**  
Legal Assistant  
700 Louisiana, Suite 2300  
Houston, TX 77002  
713-547-9105 office  
713-547-9150 fax  
[jmarlowe@hicks-thomas.com](mailto:jmarlowe@hicks-thomas.com)  
[www.hicks-thomas.com](http://www.hicks-thomas.com)

From: Racheal Reyes <[rreyes@hicks-thomas.com](mailto:rreyes@hicks-thomas.com)>  
Sent: Monday, August 5, 2024 12:04 PM  
To: Jackie Marlowe <[jmarlowe@hicks-thomas.com](mailto:jmarlowe@hicks-thomas.com)>  
Subject: Re: JT's AMEX

One more question, I see the case numbers you provided, but I'm having a hard time tracing them back to client matter numbers. Do you happen to know?

From: Jackie Marlowe <[jmarlowe@hicks-thomas.com](mailto:jmarlowe@hicks-thomas.com)>  
Sent: Monday, August 5, 2024 11:52 AM  
To: Racheal Reyes <[rreyes@hicks-thomas.com](mailto:rreyes@hicks-thomas.com)>  
Subject: RE: JT's AMEX

This is for case no. 3:24-cv-00208

07/05/2024	<a href="#">1</a>	NOTICE OF REMOVAL from 239TH Judicial District of Brazoria County, case number 128926-CV (Filing fee \$ 405 receipt number ATXSDC-31857593) filed by ZACHRY INDUSTRIAL, INC., ZACHRY INDUSTRIES, INC., ZACHRY ENTERPRISE SOLUTIONS DEMERGER, INC., JVIC DEMERGER FABRICATION, INC.. (Attachments: # <a href="#">1</a> Exhibit 1, # <a href="#">2</a> Exhibit 2) (Thomas, John) (Entered: 07/05/2024)
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This is for case no. 3:24-cv-00209

7/05/2024	<a href="#">1</a>	NOTICE OF REMOVAL from 412TH Judicial District of Brazoria County, case number 128933-CV (Filing fee \$ 405 receipt number ATXSDC-31857811) filed by JVIC Demerger Fabrication, Inc., Zachry Enterprise Solutions Demerger, Inc., Zachry Industrial Inc., Zachry Industries, Inc.. (Attachments: # <a href="#">1</a> Exhibit 1, # <a href="#">2</a> Exhibit 2) (Thomas, John) (Entered: 07/05/2024)
-----------	-------------------	---



**Jackie Marlowe**  
Legal Assistant  
700 Louisiana, Suite 2300  
Houston, TX 77002  
713-547-9105 office  
713-547-9150 fax  
[jmarlowe@hicks-thomas.com](mailto:jmarlowe@hicks-thomas.com)  
[www.hicks-thomas.com](http://www.hicks-thomas.com)

From: Racheal Reyes <[rreyes@hicks-thomas.com](mailto:rreyes@hicks-thomas.com)>  
Sent: Monday, August 5, 2024 11:41 AM  
To: Jackie Marlowe <[jmarlowe@hicks-thomas.com](mailto:jmarlowe@hicks-thomas.com)>  
Subject: JT's AMEX

There are also 2 charges for \$405.00 for COURTS/USDC-TX PAY.

**FW: Pay.gov Payment Confirmation: TEXAS SOUTHERN DISTRICT COURT**

Jackie Marlowe <jmarlowe@hicks-thomas.com>

Wed 7/31/2024 2:11 PM

To: Racheal Reyes <rreyes@hicks-thomas.com>

■ 1 attachments (4 MB)

2024.07.31 [001] Notice of Removal - Exhibits.pdf;

Fee for 405.00 Notice of Removal (Zachry/CB&I) Below and attached.

-----Original Message-----

From: do\_not\_reply@psc.uscourts.gov <do\_not\_reply@psc.uscourts.gov>

Sent: Wednesday, July 31, 2024 2:03 PM

To: Jackie Marlowe <jmarlowe@hicks-thomas.com>

Subject: Pay.gov Payment Confirmation: TEXAS SOUTHERN DISTRICT COURT

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Your payment has been successfully processed and the details are below. If you have any questions or you wish to cancel this payment, please contact: Financial Services Group at 713-250-5875.

Account Number: 5197696

Court: TEXAS SOUTHERN DISTRICT COURT

Amount: \$405.00

Tracking Id: ATXSDC-31971116

Approval Code: 144734

Card Number: \*\*\*\*\*1018

Date/Time: 07/31/2024 03:03:26 ET

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## INVOICE

### BILL TO

Mr. John Thomas  
Hicks Thomas LLP  
700 Louisiana, Suite 2000  
Houston, TX 77002

INVOICE # 40257-1

DATE 05/31/2024 DUE

DATE 07/15/2024

TERMS Net 45

### CASE

Zachry Industrial, Inc. v. Golden Pass LNG Terminal LLC

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
05/29/2024	Meeting/Consult - PWR	Read complaint and develop outline of slides for mediation. Zoom meeting with JT, SB to discuss themes and slides.	2:15	300.00	675.00
05/30/2024	Graphic Design - PWR	Create draft slide decks from complaint outline and SB key docs outline. 50+ slides. Send versions 1.0-3.0 to client for review.	7:00	300.00	2,100.00
05/30/2024	Meeting/Consult - PWR	Zoom session with JT, JD, SB and live slide editing for v 2.0.	1:45	300.00	525.00
05/31/2024	Meeting/Consult - PWR	Zoom meeting with HT and SG teams - slide edits and new slides for creation.	0:30	300.00	150.00
05/31/2024	Graphic Design - PWR	Create new slides from meeting instruction. Send v. 4.0 to team for review. Create Key Players slides. Edits to slides per instruction. Send v 5.0 for review and comment.	2:45	300.00	825.00

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BALANCE DUE

**\$4,275.00**

Tax ID: 76-0544917





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# INVOICE

**BILL TO**

Mr. John Thomas  
 Hicks Thomas LLP  
 700 Louisiana, Suite 2000  
 Houston, TX 77002

**INVOICE #** 40257-2**DATE** 11/30/2024**DUE DATE** 01/15/2024**TERMS** Net 30**CASE**

Zachry Industrial, Inc. v. Golden Pass LNG Terminal LLC

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
11/11/2024	<b>On-Site Trial Support - BMK</b>	Meet at Hicks Thomas with John T. and John D. Version 1.0 of slides to the team.	4:00	250.00	1,000.00
11/12/2024	<b>Meeting/Consultation - BMK</b>	Meeting at Hicks Thomas. Slide deck versions 2.0 and 3.0 to team.	6:30	250.00	1,625.00
11/13/2024	<b>Graphic Design - BMK</b>	Edits received from John T. Version 4.0 and 4.1 of slides sent to the team.	2:00	250.00	500.00
11/14/2024	<b>Meeting/Consultation - BMK</b>	Meeting at Hicks Thomas. Zoom meeting with joint venture partners. Updates to slide deck (versions 5.0 through 8.0 sent to team).	8:00	250.00	2,000.00
11/15/2024	<b>Graphic Design - BMK</b>	Citation updates to slides. Slide deck versions 9.0 and 10.0 to team.	2:45	250.00	687.50
11/16/2024	<b>Graphic Design - BMK</b>	New slide (Warranty and Correction of Work). Update to Contractor's/Owners Insurance slide. Slide deck versions 11.0 and 12.0 to the team.	1:15	250.00	312.50

Tax ID: 76-0544917

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
11/17/2024	<b>Graphic Design - BMK</b>	Updated slide deck to the team (versions 13.0 and 14.0).	1:15	250.00	312.50
11/18/2024	<b>In-Court Trial Consultant - BMK</b>	In court for hearing in Judge Isgur's court.	2:15	250.00	562.50
11/25/2024	<b>Graphic Design - BMK</b>	Defective bolts diagram to John D. and John T.	0:15	250.00	62.50
Subtotal:					7,062.50
11/12/2024	<b>Billable Parking</b>	Theater District Garag - Parking for meeting at Hicks Thomas	1		20.00
11/18/2024	<b>Billable Parking</b>	Theater District Garag - Parking for hearing in Federal Bankruptcy Court	1		17.00
Subtotal:					37.00

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BALANCE DUE

**\$7,099.50**

## Cimplifi Billing Information for December 2025

Client						Is	Total Size	Production	Total	Total	
Artifact ID	Workspace	Client	Matter Name	Matter Num	Status	Current	Adjusted	Size	Size	Cost Per GI	Monthly Cost
2464278	Zachry_FLNG	HicksThomas LLP	Zachry_FLNG	2162_16230	Active	TRUE	22.72	0	22.72	14	\$318.08

Cimplifi Billing Information for January 2025

Client						Is	Total Size	Production	Total	Total	
Artifact ID	Workspace	Client	Matter Name	Matter Num	Status	Current	Adjusted	Size	Size	Cost Per Gi	Monthly Cost
2464278	Zachry_FLNG	HicksThomas LLP	Zachry_FLNG	2162_16230	Active	TRUE	22.72	0	22.72	14	\$318.08

Cimplifi Billing Information for January 2025

Client												Total Monthly
Artifact ID	Workspace	Client	Matter Name	Matter Num	Status	Is Current	Total Size Adjusted	Production Size	Total Size	Cost Per G	Cost	Cost
2464278	Zachry_FLNG	HicksThomas LLP	Zachry_FLNG	2162_16230	Active	TRUE	22.72	0	22.72	14	\$318.05	

### Cimplifi Billing Information for January 2025

Client		Matter Name		Status	Is Current	Total Size	Production	Total	Total	
Artifact ID	Workspace	Client	Matter Name			Adjusted Size	Size	Size	Cost Per G	Monthly Cost
2464178	Zachry Group_GPX Files	Thomas U.P. Zachry Group	2152/16231	Active	TRUE	6.38	0.87	7.45	14	\$164.30

### Cimplifi Billing Information for January 2025

Client	Workspace	Client	Matter Name	Matter Num	Status	Is Current	Total Size Adjusted	Production Size	Total Size	Cost Per G	Total Monthly Cost
2454278	Zachry Group - Chapter 11 - GFX Doc Produ	McCl Thomas LLP	Zachry Group	2162/16131	Active	TRUE	0.16	0	0.16	14	\$2.24

## Cimplifi Billing Information for January 2025

Client												Total Monthly
Artifact ID	Workspace	Client	Matter Name	Matter Num	Status	Is Current	Total Size Adjusted	Production Size	Total Size	Cost Per Gi	Cost	
2464278	Zachry Group - Chapter 11 - GPX Doc Produ	HicksThomas LLP	Zachry Group	2162/16231	Active	TRUE	0.16	0	0.16	14	\$2.24	