UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACTION 2, LLC; and FLNG LIQUEFACTION 3, LLC, Plaintiffs, v. 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., Defendants.	§ § § § § § § § § § § § § § § § § § §	Adv. Pro. No. _____ Removed from: 412th Judicial District Court Brazoria County, Texas Cause No. 128933-CV Related to: In re: Zachry Holdings, Inc., *et al.* Case No. 24-90377 (MI)

NOTICE OF REMOVAL BY DEFENDANTS ZACHRY INDUSTRIAL, INC.; ZACHRY INDUSTRIES, INC.; JVIC DEMERGER FABRICATION, INC.; AND ZACHRY ENTERPRISE SOLUTIONS DEMERGER, INC.

TO THE COURT AND TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1334(b) and 1452(a), Federal Rule of Bankruptcy Procedure 9027(a)(1), and Local Rule 9027–1, Defendants Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; and Zachry Enterprise Solutions Demerger, Inc. (collectively, "Removing Defendants") hereby remove to this Court this action pending in the 412th Judicial District Court of Brazoria County, Texas, Cause Number 128933-CV ("Removed Action").

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The grounds for removal are as follows:

1. On May 21, 2024, Defendant Zachry Industrial, Inc. and affiliated entities (collectively, "Zachry") filed voluntary petitions for relief under Chapter 11 of the U.S. Bankruptcy Code in this Court, consolidated into Case No. 24-90377 ("Zachry Chapter 11 Cases"). According to its first-day declaration, Zachry sought bankruptcy protection "as a result of financial distress caused by one of [the debtors'] major projects, the liquified natural gas . . . project . . . awarded to Debtor [and Defendant herein] Zachry Industrial, Inc." and its joint venture partners. Zachry Chapter 11 Cases, Doc. 7 at 2, ¶ 3. Those joint-venture partners are co-Defendants Chiyoda International Corporation and CB&I LLC, the latter of which is a wholly owned subsidiary of co-Defendant McDermott International, Inc. *Id.* The Zachry Chapter 11 Cases remain pending.

2. On June 7, 2024, two groups on insurers each filed separate subrogation cases in Brazoria County, Texas: (1) *Allianz Global Risks US Insurance Co., et al. v. Zachry Industrial, Inc., et al.*, 239th Judicial District Cause No. 128926-CV; and (2) this Removed Action (collectively, "Brazoria County Cases"). Both Brazoria County Cases assert the same allegations and essentially the same claim for negligence arising from a June 8, 2022 incident at the Quintana Island LNG Liquefaction and Export Terminal in Freeport, Texas. The incident caused damages to the facility, for which the plaintiff insurers allegedly indemnified their insureds — and seek reimbursement from Defendants jointly and severally — for more than $1.3 billion. The plaintiff insurers have requested citation and served Defendants, but no other filings have occurred in the Brazoria County Cases.

3. Removing Defendants expressly do not concede that they are proper parties to either of the Brazoria County Cases.

4. The Brazoria County Cases are civil actions that may be removed to this Court pursuant to 28 U.S.C. § 1452(a) because the Court has jurisdiction over the claims asserted therein under 28 U.S.C. § 1334. Section 1334(b) grants this Court "original but not exclusive jurisdiction of all civil proceedings . . . related to cases under title 11," and it "is well established that '[f]ederal courts have "related to" subject matter jurisdiction over litigation arising from a bankruptcy case if the proceeding could conceivably affect the estate being administered in bankruptcy.'" *In re KSRP, Ltd.*, 809 F.3d 263, 266 (5th Cir. 2015) (quoting *Lone Star Fund V (U.S.), L.P. v. Barclays Bank PLC*, 594 F.3d 383, 386 (5th Cir. 2010)). Moreover, cases "are 'related to' a bankruptcy case if they involve legal claims by and against the debtor." *Menggui Zhang v. Rothrock*, 2006 WL 8446467, at *1 (S.D. Tex. Jan. 4, 2006).

5. The Brazoria County Cases fall under "related to" jurisdiction because they involve legal claims against debtor Zachry Industrial, Inc., and because they could conceivably affect the estate being administered in bankruptcy. Specifically, as noted above, the Brazoria County Cases seek money judgments against Zachry and its co-Defendants jointly and severally for more than **$1.3 billion**. According to Zachry's first-day declaration, these potential damages are nearly eight times Zachry's cash on hand and nearly one-fourth of its entire 2023 revenue. Zachry Chapter 11 Cases, Doc. No. 7 at 13, ¶ 27. The claims asserted in the Brazoria County Cases will represent one of the largest — if not the largest — claim against Zachry's estate. Zachry will likely incur significant costs disputing liability

and damages, further reducing its estate and affecting the administration. If there is a judgment against Zachry's co-Defendants, Zachry might be subject to contribution claims.

6. Removal by Removing Defendants is timely under 28 U.S.C. § 1446(b)(1) and Federal Rule of Bankruptcy Procedure 9027(a)(3)(A), because Removing Defendants first received copies of the petitions in the Brazoria County Cases on or about June 11, 2024, which is fewer than 30 days ago.

7. Pursuant to Federal Rule of Bankruptcy Procedure 9027(a)(1), the Removing Parties state that they consent to entry of final orders or judgment by the bankruptcy court.

8. The information required by Local Rule 9027-1(a) — (i) a list of all names and addresses of the parties, (ii) a designation of those parties service of process has been accomplished, and (iii) a list of the name, address, and telephone number of the counsel for every party — is attached hereto as Exhibit 1.

9. Pursuant to Federal Rule of Bankruptcy Procedure 9027(a)(1) and Local Rule 9027–1(b), copies of all papers that have been filed in the 412th Judicial District Court of Brazoria County, Texas are attached hereto as Exhibit 2.

10. Pursuant to 28 U.S.C. § 1446(d) and Federal Rule of Bankruptcy Procedure 9027(b)–(c), Removing Defendants will, promptly after filing this Notice of Removal, (1) serve a copy of the notice on all parties to the Brazoria County Cases and (2) file a copy of the notice with the clerk of the 412th Judicial District Court of Brazoria County, Texas.

WHEREFORE, Defendants Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; and Zachry Enterprise Solutions Demerger, Inc. respectfully give notice that the Removed Action pending against them in the 412th Judicial District Court of Brazoria County, Texas is hereby removed to this Court.

Dated: July 5, 2024

Respectfully submitted,

/s/ John B. Thomas

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Facsimile: (713) 547-9150

Counsel for Defendants Zachry Industrial, Inc.; Zachry Industries, Inc.; JVIC Demerger Fabrication, Inc.; and Zachry Enterprise Solutions Demerger, Inc.

INDEX OF EXHIBITS

1. All information required by Local Rule 9027–1(a).

2. Copies of all papers filed in Cause No. 128933-CV in the 412th Judicial District Court of Brazoria County, Texas.

Exhibit 1

INFORMATION REQUIRED BY LOCAL RULE 9027–1(a)

Plaintiff FLNG Liquefaction, LLC
Plaintiff FLNG Liquefaction 2, LLC
Plaintiff FLNG Liquefaction 3, LLC
333 Clay Street, Suite 5050
Houston, Texas 77002

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(713) 802-9117

NOTE: Service of process has been accomplished on all Defendants.

Removing Defendant Zachry Industrial, Inc.
Removing Defendant Zachry Industries, Inc.
Removing Defendant JVIC Demerger Fabrication, Inc.
Removing Defendant Zachry Enterprise Solutions Demerger, Inc.
527 Logwood Avenue
San Antonio, Texas 78221

Counsel:
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Defendant McDermott International, Inc.
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Houston, Texas 77079

Counsel:
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Houston, Texas 77002
(713) 427-5000

Defendant Chiyoda International Corporation
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Houston, Texas 77042

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Brian Singleterry
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(817) 347-6619

Defendant PSRG, Inc.
800 West Sam Houston Parkway South, Suite 107
Houston, Texas 77042

Counsel:
Unknown

Exhibit 2

PAPERS FILED IN CAUSE NO. 128933-CV IN THE 412TH JUDICIAL DISTRICT COURT OF BRAZORIA COUNTY, TEXAS

A. Register of Actions (as of July 5, 2024).

B. Plaintiffs' Original Petition (June 7, 2024).

C. Case Information Sheet (June 7, 2024).

D. Process Request (June 10, 2024).

E. Return of Service for CB&I, LLC (June 18, 2024).

F. Return of Service for McDermott International, LTD. (June 18, 2024).

G. Return of Service for Chiyoda International Corporation (June 18, 2024).

H. Return of Service for Zachry Industries, Inc. (June 18, 2024).

I. Return of Service for JVIC Demerger Fabrication, Inc. (June 18, 2024).

J. Return of Service for Zachry Enterprise Solutions Demerger, Inc. (June 18, 2024).

K. Return of Service for Zachry Industrial, Inc. (June 18, 2024).

L. Return of Service for PSRG, Inc. (June 24, 2024).

A

Register of Actions
Case No. 128933-CV

FLNG Liquefaction, LLC; FLNG Liquefacation 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. §

Case Type: **Other Civil**
Date Filed: **06/07/2024**
Location: **412th District Court**

Party Information

		Attorneys
Defendant	**CB&I, LLC**	
Defendant	**Chiyoda International Corporation**	
Defendant	**JVIC Demerger Fabrication, Inc.**	
Defendant	**McDermott International Ltd.**	
Defendant	**PSRG, Inc.**	
Defendant	**Zachry Enterprise Solutions Demerger, Inc.**	
Defendant	**Zachry Industrial, Inc.**	
Defendant	**Zachry Industries, Inc.**	
Plaintiff	**FLNG Liquefaction 2, LLC**	**Richard T. Fass** *Retained* 713-802-9117(W)
Plaintiff	**FLNG Liquefaction 3, LLC**	**Richard T. Fass** *Retained* 713-802-9117(W)
Plaintiff	**FLNG Liquefaction, LLC**	**Richard T. Fass** *Retained* 713-802-9117(W)

Events & Orders of the Court

	OTHER EVENTS AND HEARINGS		
06/07/2024	**Original Petition (1-10 Plaintiffs) (OCA)**		
06/07/2024	**Case Information Sheet**		
06/07/2024	**Request**		
06/10/2024	**Jury Fee Paid**		
06/11/2024	**Citation**		
	Zachry Industrial, Inc.	Served	06/17/2024 2:45 PM
	Zachry Industries, Inc.	Served	06/17/2024
	JVIC Demerger Fabrication, Inc.	Served	06/17/2024 2:45 PM
	Zachry Enterprise Solutions Demerger, Inc.	Served	06/17/2024 2:45 PM
	CB&I, LLC	Served	06/17/2024 2:45 PM
	McDermott International Ltd.	Served	06/17/2024 2:45 PM
	Chiyoda International Corporation	Served	06/17/2024
	PSRG, Inc.	Served	06/21/2024
06/18/2024	**Service Returned**		
06/18/2024	**Service Returned**		
06/18/2024	**Service Returned**		
06/18/2024	**Service Returned**		
06/18/2024	**Service Returned**		
06/18/2024	**Service Returned**		
06/18/2024	**Service Returned**		
06/24/2024	**Service Returned**		

B

Filed for Record
6/7/2024 11:17 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Carly Whistler, Deputy

128933-CV

CAUSE NO. _____

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACTION 2, LLC; and FLNG LIQUEFACTION 3, LLC. *Plaintiffs*, V. 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. *Defendants.*	§ §	IN THE DISTRICT COURT OF BRAZORIA COUNTY, TEXAS _____ JUDICIAL DISTRICT COURT

PLAINTIFFS' ORIGINAL PETITION AND JURY DEMAND

COME NOW, FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, and FLNG LIQUEFACTION 3, LLC (collectively "FLNG" or "Plaintiffs"[1], Plaintiffs in the above-styled and numbered cause of action, complaining of Defendants, Zachry Industrial, Inc., Zachry Industries, Inc., JVIC Demerger Fabrication, Inc., Zachry Enterprise Solutions Demerger, Inc. (collectively "Zachry" herein), CB&I, LLC ("CB&I") f/k/a CBI, Inc., McDermott International Ltd. ("McDermott"); Chiyoda International Corporation, ("Chiyoda") (Zachry, McDermott and Chiyoda are hereinafter jointly referred to as the "Joint Venture" and "Joint Venture Defendants"), and PSRG Inc. ("PSRG") (all parties hereinafter jointly referred to as "Defendants"), and in support thereof would show unto this Honorable Court the following:

[1] See Section X, below

POOR ORIGINAL

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I. DISCOVERY CONTROL PLAN

1. Pursuant to Rule 190.4 of the Texas Rules of Civil Procedure, discovery is to be conducted under Level 3. Plaintiffs request that this Honorable Court issue a docket control/scheduling order.

II. PARTIES

2 FLNG LIQUEFACTION, LLC, is a Delaware limited liability corporation with its principal place of business/headquarters located at 333 Clay Street, Suite 5050, Houston, TX 77002 in Harris County, Texas. Freeport LNG Expansion, L.P., its sole member of FLNG. Freeport LNG Expansion GP, Inc. is the General Partner of Freeport LNG Expansion, L.P.

3. FLNG LIQUEFACTION 2, LLC, is a Delaware limited liability corporation with its principal place of business/headquarters located at 333 Clay Street, Suite 5050, Houston, TX 77002 in Harris County, Texas.

4. FLNG LIQUEFACTION 3, LLC, is a Delaware limited liability corporation with its principal place of business/headquarters located at 333 Clay Street, Suite 5050, Houston, TX 77002 in Harris County, Texas.

5. The named Plaintiffs shall collectively be called “Plaintiffs or “FLNG” in this pleading.

6. ZACHRY INDUSTRIAL, INC., is a Texas corporation whose principal place of business is located at 527 Logwood, San Antonio, Bexar County, Texas 78221. This defendant may be served with process by serving its registered agent, C T Corporation System, at its registered business address, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136, or wherever it may be found.

7. ZACHRY INDUSTRIES, INC., is a Texas corporation whose principal place of business is located at 527 Logwood, San Antonio, Bexar County, Texas 78221. This defendant

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may be served with process by serving its registered agent, C T Corporation System, at its registered business address, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136, or wherever it may be found.

8. JVIC DEMERGER FABRICATION, INC., is a Texas corporation whose principal place of business is located at 527 Logwood, San Antonio, Bexar County, Texas 78221. This defendant may be served with process by serving its registered agent, C T Corporation System, at its registered business address, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136, or wherever it may be found.

9. ZACHRY ENTERPRISE SOLUTIONS DEMERGER, INC., is a Texas corporation whose principal place of business is located at 527 Logwood, San Antonio, Bexar County, Texas 78221. This defendant may be served with process by serving its registered agent, C T Corporation System, at its registered business address, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136, or wherever it may be found.

10. Plaintiffs intend to name only the correct Zachry entity or entities. On information and belief, and based on a review of their filings with the Texas Secretary of State, it appears that Zachry Industrial, Inc., has converted to Zachry Industries, Inc. There was then a merger that created JVIC Demerger Fabrication, Inc. and Zachry Enterprise Solutions Demerger, Inc. Upon a stipulation with the Zachry defendants, Plaintiffs will non-suit without prejudice any parties not proper to this lawsuit. Plaintiffs intend to pursue recovery from only the proper entity or entities.

11. CB&I LLC, f/k/a CBI, Inc., is a Texas limited liability company located at 915 N. Eldridge Parkway Houston, Harris County, Texas 77079. This defendant may be served with process by serving its registered agent, C T Corporation System, at its registered business address, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136, or wherever it may be found.

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12. McDERMOTT INTERNATIONAL, LTD., is a Bermuda entity whose principal place of business is located at 915 N. Eldridge Parkway Houston, Harris County, Texas 77079. This defendant may be served with process by serving its registered agent, C T Corporation System, at its registered business address, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136, or wherever it may be found.

13. CHIYODA INTERNATIONAL CORPORATION is a Washington corporation with its principal office located at 2050 W Sam Houston Pkwy S, Suite 850, Houston, Texas 77042. This defendant may be served with process by serving its registered agent, CT Corporation System at its registered business address, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136, or wherever it may be found.

14. PSRG, INC., is a Texas corporation whose principal place of business is located at 800 West Sam Houston Parkway South, Suite 107, Houston, Harris County, Texas 77042. This defendant may be served with process by serving its registered agent, Robert J. Weber, at its registered business address, 800 West Sam Houston Parkway South, Suite 107, Houston, Texas 77042, or wherever he may be found.

III. JURISDICTION and VENUE

15. This Court has jurisdiction in this cause since the damages to Plaintiffs are within the jurisdictional limits of this Court.

16. As there is not complete diversity among the parties, there is no Federal Court jurisdiction so any attempt at removal would be improper.

17. Pursuant to Rule 47 of the Texas Rules of Civil Procedure, Plaintiffs seek monetary relief over $1,000,000.

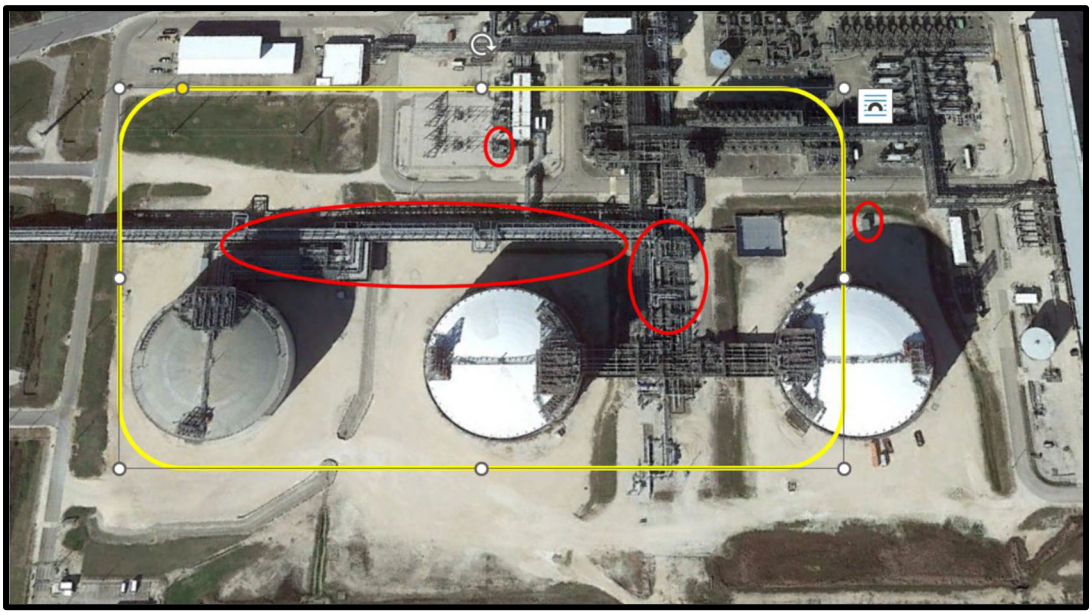
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18. All or a substantial part of the events or omissions giving rise to the claim occurred in Brazoria County, Texas. Therefore, venue is proper pursuant to §15.002(a)(1) of the Texas Civil Practice & Remedies Code.

19. All conditions precedent have occurred, have been performed, or have been waived.

IV. FACTS

20. FLNG is the owner and operator of a natural gas liquefaction facility known as the Quintana Island LNG Liquefaction and Export Terminal ("Facility" or "Terminal"). The Terminal (see photo below) is located 57 miles south of the city of Houston, Texas, and 40 miles southwest of the city of Galveston, Texas. The terminal has 3 LNG (liquefied natural gas) storage production plants referred to as Train 1, Train 2, and Train 3. Train 1 was the first to become operational and began liquefaction and exporting LNG in 2019, while Trains 2 & 3 began operations and exporting in 2020.



21. The inbound natural gas is compressed and then propane refrigerant is utilized to pre-cool the gas to a temperature of -30° Fahrenheit (-34° Celsius). Upon being cooled, the gas then enters the MCHE (Main Cryogenic Heat Exchanger) and is further chilled by a mixed

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refrigerant (combination of propane, methane, ethane and nitrogen) to a temperature of -263°F (-163°C) where it becomes liquified, and its volume is reduced to 1/600 of the original gaseous volume.

22. The LNG is then transported via insulated pipeline at -263°F to a one of three cryogenic storage tanks where it is stored at near atmospheric pressure. The image below shows the three tanks from Train 1, 2 and 3 where the LNG is stored.



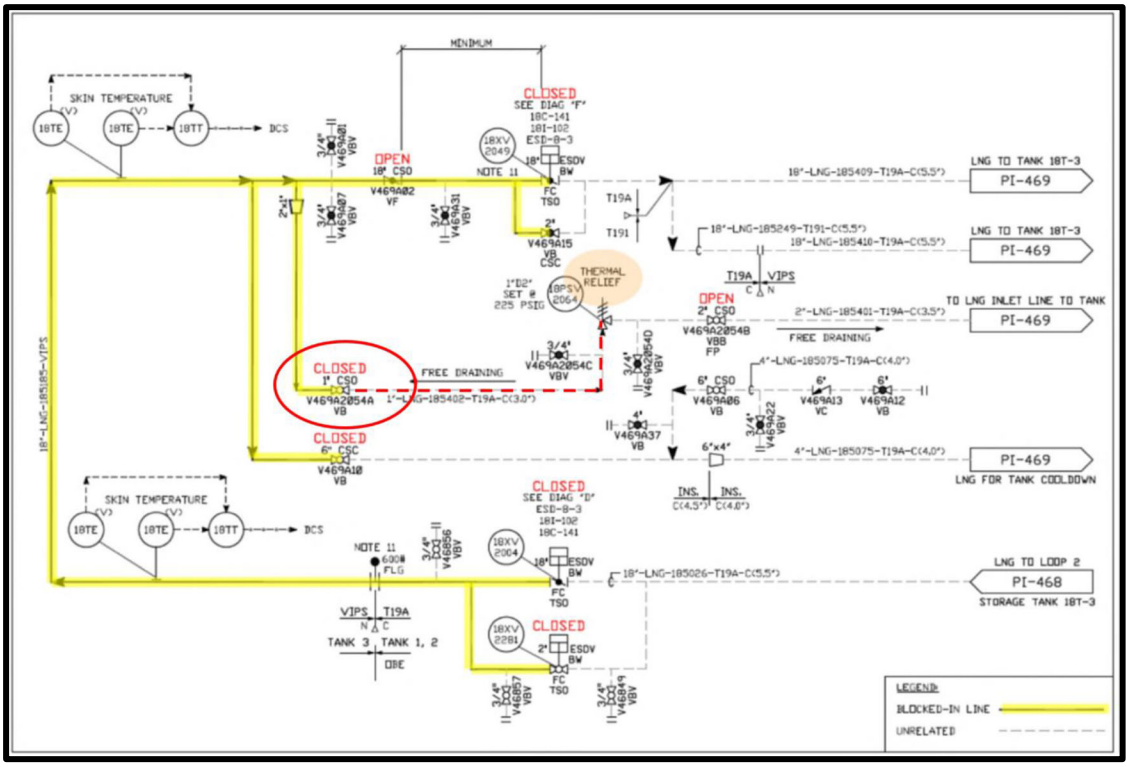
23. The Facility was operating normally when on June 8, 2022, a deflagration/explosion and fire occurred without notice ("Incident"). A fire ensued. The Incident caused significant damage to the Facility. The resulting damage included displaced and destroyed piping, damage to electrical systems, structural support damage, damage to concrete containment channels, as well as shrapnel damage to cable trays and other damaged items (see yellow and red circles on the 1st photo). This caused the Facility to be shut down for repair and replacement

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operations. The Facility suffered substantial business interruption and lost profits during this extended shutdown period.

24. Pressure Safety Valve 18PSV-2054 underwent annual testing in April 2022. To conduct the testing, the upstream PSV isolation valve was closed, and a third-party contractor performed the PSV testing,

25. On June 3, 2022, valves 18XV-2004 and 18XV-2049 were closed thereby blocking in the line to which the 18PSV-2054 valve served (see diagram below).



26. The pipeline section as highlighted in yellow in the consolidated line drawing terminated at 6 valves. The red circle and dashed lines have been added to the drawing to illustrate the manual valve and the path to the PSV 18PSV-2054. Following the Incident, the isolation valve to PSV 18PSV-2054 was found in the closed position.

27. After closing the 18XV-2004 and 18XV-2049 valves on June 3, 2022, the LNG in the pipeline at -263F and the process line, itself, began to warm due to the lack of product flow.

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As the LNG and pipelines warmed, the LNG therein began to expand, exerting increased internal pressure on the piping. On June 8, 2022 excessive pressure levels caused the 18" LNG line (18"-LNG-185185-VIPS) to catastrophically fail.

V. LIABILITY OF DEFENDANTS

28. Associated piping instrumentation, process data trending and process alarms were designed and installed by the Joint Venture to aid in the assessment of the piping including its pressure and pressure trending to keep it in a safe process operating zone and avoid any hazardous conditions. However, upon investigation post-Incident, it was discovered that after commissioning., i.e. startup, the Joint Venture decided the described instrumentation was no longer needed and eliminated noticeable and audible alarm(s) and data trending, etc., for the operators to be warned and therefore address what could be and ultimately was a dangerous situation. There were no temperature trending or alarms available outside of initial commissioning but there should have been. Had there been temperature trending or alarms available outside of initial commissioning, this Incident would have never happened.

29. Because Line 18"-LNG-185185-VIPS did not have operable temperature or pressure instrumentation with alarms, and trending, the operators in the control room were unaware that the LNG within the line was warming beyond critical temperatures and exerting excessive pressure on the line and its components until the Incident occurred.

30. The HAZOP Study documented in LQF LNG Storage Tank 18T-3 HAZOP Report dated July 22, 2016, failed to evaluate the impact of operating modes and potential consequences caused by the intentional or accidental closure of Valves 18XV-2004 and 18XV-2049 by operators and the resulting over pressurization of Line 18"-LNG-185185-VIPS due to LNG thermal expansion. This is the fault of the Joint Venture and PSRG.

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31. PSRG a/k/a Process Safety and Reliability Group conducted studies of the FLNG systems and failed to identify this obvious potentially hazardous condition and did not provide recommendations to eliminate this hazard or at least warn against it.

A. Negligence

32. The Incident made the basis of this lawsuit resulted, at least in part, from the improper conduct of Defendants. The conduct of the Defendants, as described herein, constitutes negligence as that term is understood in law and such negligent conduct was a proximate cause of the occurrence and damages to Plaintiffs made the basis of this suit. The Defendants' negligent and accidental actions, conduct, and/or omissions included, but are not limited to, one or more of the following non-exclusive particulars:

a. making the piping instrumentation, process data trending, process pressure and alarms for Line 18"-LNG-185185-VIPS hidden, inaudible and unavailable to the plant operations;

b. failing to make the piping instrumentation, process data trending, process pressure and alarms for Line 18"-LNG-185185-VIPS visible and audible to the plant operations;

c. failing to conduct studies of the FLNG systems to identify this obvious potentially hazardous condition;

d. failing to provide recommendations to eliminate this hazard or at least warn against it;

e. hiding the piping instrumentation, process data trending, process pressure and alarms for Line 18"-LNG-185185-VIPS so that it was invisible and inaudible to plant operations; and/or

f. Otherwise failing to use due care under the circumstances.

33. Each of the above-referenced acts and omissions, singly or in combination with others, constituted negligence, which proximately caused the occurrence and the damages suffered by the Plaintiffs, which are in excess of the minimum jurisdictional limits of this court.

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34. Plaintiffs would show that the Defendants were negligent through their acts and omissions, jointly and severally, by and through their agents, servants, employees, and/or subcontractors, acting in the course and scope of their respective employment and/or capacities, individually and/or collectively.

B. Joint and Several Liability

35. The Defendants are jointly and severally liable for the harm to the Plaintiffs and the damages caused by their negligence.

VI. DAMAGES

36. As a result of the Incident made the basis of this lawsuit described in the preceding paragraphs and the negligence of the defendants, FLNG sustained significant losses totaling $1,324,631,602 as follows:

a. Physical Damage $214,131,176;

b. Extra Expense $2,625,693; and

c. Business Interruption/Time Element $1,107,874,733.

37. After the Incident, FLNG mitigated its damages where possible by trying to determine the most efficient and economical means of getting the damaged facility repaired and/or replaced, and back online. FLNG seeks recovery for all damages arising out of this Incident to include repair and/or replacement, plus associated costs and expenses.

38. FLNG seeks recovery for all damages arising out of this Incident and respectfully requests that the trier of fact determine the damages and losses incurred in the past, as well as the monetary value of these damages, which include, but are not limited to:

a. Property damage;

b. Cost of repair and/or replacement;

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c. Associated costs and expenses for items (a) and (b) above;

c. Expediting and Extra Expenses;

d. Business Interruption; and

e. Other relevant damages.

39. Plaintiffs seek prejudgment and post-judgment interest as allowed by law, all costs of court, and judgment for all other relief, both in law and in equity, to which Plaintiffs may be justly entitled.

40. Pursuant to Rule 47 of the Texas Rules of Civil Procedure, Plaintiffs seek monetary relief over $1,000,000.

VII. JURY DEMAND

41. Plaintiffs respectfully request and demand a trial by jury. Plaintiffs tender the appropriate fee with this petition.

VIII. CERTIFICATE OF MERIT

42. Pursuant to §150.002 of the Texas Civil Practice and Remedies Code, Plaintiffs attach the Certificate of Merit of Quentin Baker, P.E. This Certificate of Merit is provided based on the information currently available, without prejudice and without conceding the applicability of Chapter 150 of the Texas Civil Practice and Remedies Code.

IX. RULE 193.7 NOTICE

43. Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Plaintiffs hereby gives notice to Defendants that any and all documents produced may be used against the Defendants producing the document at any pretrial proceeding and/or at the trial of this matter without the necessity of authenticating the documents.

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X. FOR THE COURT'S EYES ONLY

44. Plaintiffs hereby give notice to the Court and all concerned that numerous Insurers issued policies of insurance that insured Plaintiffs and which insured a portion of this loss. Insurers paid approximately $1,095,000,000 to Plaintiffs. Pursuant to their subrogation rights under the insurance policies those Insurers issued to Plaintiffs, a subset of those Insurers are asserting their rights of recovery in this legal action. The subset of Insurers represented in this filing by Zabel Freeman are AIG, AEGIS, Starr Tech, Swiss Re, Liberty, Validus, Canopius (Samsung), SCOR, Helvetia, Convex, Sompo, Markel and Inigo. The other property Insurers not listed are represented by other legal counsel and are not part of this filing.

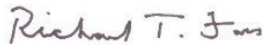
PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that Defendants be cited in terms of law to appear and answer herein, that upon final trial and hearing hereof, that Plaintiffs recover damages in accordance with the evidence, that Plaintiffs recover costs of court herein expended, that Plaintiffs recover prejudgment and post-judgment interest to which Plaintiffs are justly entitled under the law, that Plaintiffs recover attorney's fees through the final appeal of the lawsuit, and for such other further relief, both general and special, both in law and in equity, to which Plaintiffs may be justly entitled.

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Respectfully submitted,

ZABEL FREEMAN



Tom Zabel
State Bar of Texas No. 22235500
tzabel@zflawfirm.com
Brook F. Minx
State Bar of Texas No. 00789905
bminx@zflawfirm.com
Richard T. Fass
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Kevin Hood
State Bar of Texas No. 0994110
rhood@zflawfirm.com
Taylor Ann Cruse
State Bar of Texas No. 24107743
tcruse@zflawfirm.com
1135 Heights Boulevard
Houston, Texas 77008
(713) 802-9117 Phone
(713) 802-9114 Fax

ATTORNEYS FOR PLAINTIFFS

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Exhibit “A”

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CERTIFICATE OF MERIT OF QUENTIN BAKER, P.E.

My name is Quentin Baker, P.E. I am over the age of 18 and am legally competent to issue this Certificate of Merit. I am a licensed Professional Engineer in the State of Texas with 46 years of practice. I received my Bachelor of Science degree in Mechanical Engineering from Texas A&M University. My career has focused on combustion and explosions including research and development, consequence and risk analyses, and incident investigation. I work at Baker Engineering and Risk Consultants, Inc. where I am Director of Investigation Services. I am a Certified Fire and Explosion Investigator (CFEI) and a Certified Fire Investigation Instructor (CFII). I am also a Principal member of the NFPA Technical Committee that revises NFPA 921, the "Guide for Fire and Explosion Investigations." A copy of my current curriculum vitae is attached.

I have investigated the cause of the explosion and fire that occurred on June 8, 2022 at the Freeport LNG (FLNG) facility in Freeport, TX (the "Incident"). A Boiling Liquid Expanding Vapor Explosion (BLEVE) occurred when a segment of an 18-inch diameter liquefied natural gas (LNG) pipe ruptured. The 18-inch pipe was identified by line number 18"-LNG-185185-VIPS (the "LNG pipe"). LNG vapor from the ruptured pipe ignited shortly after the pipe ruptured. I reviewed process data, drawings, process hazards analyses, reports, photographs, pressure safety valve (PSV) inspection reports, and other information concerning the facility and accident. I inspected the facility while the LNG pipe was being repaired. I inspected evidence collected from the scene, which included the entirety of the ruptured pipe segment.

My investigation to date has determined that the LNG pipe ruptured due to remotely actuated control valves being closed in two locations that blocked LNG in the pipe segment between the two valves. The isolate pipe segment was about 650 ft long between the closed valves. In addition, a pressure safety valve (PSV) connected to the isolated segment of LNG pipe was unable to relieve pressure due to a manual block valve for the PSV being closed. The combination of three closed valves blocked LNG in the 18-inch pipe with no means to relieve pressure.

Over a period of five days after the LNG pipe was fully isolated, the pipe absorbed heat from the surrounding air and solar radiation. As the temperature of LNG inside the pipe increased, LNG boiled and vaporized inside the pipe, which increased pressure in the pipe. The LNG pipe ultimately ruptured from internal pressure of vaporized LNG.

The LNG pipe was equipped with temperature sensors along the isolated pipe segment. Temperature sensors were mounted on top and bottom of the inner pipe at four locations for commissioning of the pipe to ensure gradual and even cooling of the pipe as LNG was slowly introduced to the pipe. Temperature measurements were displayed on operator monitors in the Control Room during facility commissioning. There were also visible and audible alarms during commissioning to alert operators if LNG pipe temperatures exceeded operating limits.

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Commissioning of the LNG pipe was done while the Freeport facility was under the care and control of the joint venture comprised of CB&I (now McDermott), Chiyoda, and Zachary Industrial (CCZJV). On August 2, 2018, after the LNG pipe was operating, a team of 8 representatives of the CCZJV plus one representative from FLNG revised alarm rationalization. The team was chaired by an instruments and controls engineer from McDermott. Another McDermott engineer signed off on the last rationalization report on October 4, 2019. The team decided that LNG pipe temperature measurements were not needed any longer, so the team changed the alarm priority for the LNG pipe to "not be alarmed." As a result, the CCZJV (1) changed the LNG pipe temperature measurements to not alarm visibly or audibly, (2) moved temperature alarms from the primary screen to a background screen, (3) recorded temperature data in a journal data file rather than being displayed on a screen, and (4) recorded alarm data to a journal data file.

As a result of the changes in temperature monitoring and alarms, the rising temperature in the LNG pipe after it was fully isolated was not readily visible to operators, and temperature alarms were not visually or audibly available to operators. Operators were unaware of the rising temperature in the LNG pipe for the five days that it was isolated during which LNG heated and vaporized until the LNG pipe ruptured. Had the temperature display and alarm priority been left in place from commissioning, operators would have had five days to observe the temperature rise and alarms, which was ample time to investigate the temperature rise and open a valve to alleviate pressure in the LNG pipe. Changes to the display of temperatures and alarms on temperatures for the LNG pipe were errors that removed layers of protection and contributed to the cause of the Incident.

PSVs were tested annually at FLNG. The frequent testing required of PSVs in LNG service in-situ were opportunities for human error exactly like occurred in the Incident. The 650 ft segment LNG pipe that ruptured was protected by a single PSV with no other layers of protection. A Hazards and Operability (HAZOP) study performed in 2016 failed to consider operating modes that allowed operators to simultaneously close two control valves that isolated the LNG pipe and the necessity to have a functional PSV for that mode of operation to protect against pipeline overpressurization from LNG heating and vaporization. A second HAZOP study was performed in 2019, this one being a Management of Change (MOC) study that included a change in the LNG pipe from 26 inch to 18 inch. This MOC also failed to consider the operating modes that allowed the LNG pipe to be isolated by control valves and the necessity to have a functional PSV. LNG industry practice for a process hazards analysis (PHA), including a HAZOP, is to evaluate protective systems including PSVs to ensure that protective systems will work to avoid over-pressuring an LNG pipe due to heating and vaporization. Had the HAZOP teams evaluated the overpressure protection on the LNG pipe, additional layers of protection could have been added, such as a formal car seal (valve lock) program including an independent operator check that the manual block valve for the PSV was opened after PSV testing and a car seal was installed to lock the valve open. Process Safety and Reliability Group (PSRG) facilitated the 2016 and 2019 HAZOPs and wrote the HAZOP reports. The HAZOP teams were comprised of personnel from

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PSRG, CCZJV, and FLNG. Failure to add layers of protection was an error on their part that contributed to the cause of the Incident.

I reserve the right to modify or supplement my findings and opinions if new information becomes available and is provided to me.

Submitted June 7, 2024

Quentin A. Baker, P.E.

STATE OF TEXAS

COUNTY OF BEXAR

This instrument was acknowledged before me on 06/07/2024 by Quentin Baker.

Maria Lopez

Notary Public

Printed Name: Maria Lopez

My Commission Expires:

ML
11/14/~~2024~~ 2026

MARIA JESUS LOPEZ
Notary ID #134065134
My Commission Expires
November 14, 2026

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BAKERRISK

QUENTIN A. BAKER, P.E.

Director – Investigation Services

Senior Principal Engineer

M.B.A., University of Texas at San Antonio

B.S., Mechanical Engineering, Texas A&M University

Areas of Practice

Mr. Baker's career has focused on explosion and combustion phenomena. He has conducted numerous R&D projects, hazards analyses, and engineering studies involving airblast effects from a wide variety of explosion sources, blast loads, fragmentation effects, debris throw, blast damage, and personnel injury. Injury prediction and risk analysis have also been the subject of Mr. Baker's research; he has contributed to the development of a building occupant vulnerability model.

Experience

- Mr. Baker's experience with explosion phenomena includes experimentation with high explosives. He conducted an R&D program to develop a distributed explosives system to neutralize landmines, testing the system both on land and in shallow water to investigate blast output and sympathetic detonation of an acceptor charge. He also conducted tests to study shaped charge initiation of cased acceptor charges from long standoffs, with the acceptor charges positioned above ground and buried.
- Researched airblast propagation through openings into buildings and designed and tested passive devices to protect ventilation systems, which resulted in a patented design.
- Contributed to the design of a vapor cloud explosion test apparatus and participated in vapor cloud explosion tests.
- Developed shock tubes to simulate the blast loading from very large explosive charges and vapor cloud explosions. He subsequently tested glass/glazing systems to protect building occupants from glass fragments from vapor cloud explosion threats.
- Worked on numerous facility siting, safety analysis review, consequence analysis, explosion hazard analysis and blast-resistant structural design projects during which he predicted internal and external blast loads. The blast sources have included high explosives, runaway chemical reactions, dust explosions, electrical arc, vapor clouds, bursting pressure vessels, and propellants. He has predicted fragment size, velocity, and throw for bursting pressure vessels and cased explosives.
- Inspected numerous petrochemical plants, specialty chemical plants, refineries, offshore platform, and other industrial facilities; identified explosion hazards, and developed explosion scenarios. He has conducted facility-wide risk analyses to predict the risk to personnel from potential explosion hazards.
- Investigated over 120 accidental explosions and fires, both domestic and international, to determine the number and magnitude of explosions, their locations on the site, origin of the explosion, and probable causes of initiation of each explosion. These accidents include internal and external vapor cloud explosions at refineries, chemical plants, offshore platforms, oil/gas wells, industrial facilities, and houses; an ammonium-perchlorate plant explosion; an electrical arc in a rail-gun research laboratory; runaway reactions in reactors, pipes and tanks resulting in vessel burst and fragmentation including an ethylene oxide reactor, a waste products mixing tank, an agricultural products settling tank, ammonium nitrate reactor, a loop reactor, a fertilizer pump, and a pressure relief valve; large power generation boiler explosions; BLEVEs of rail cars and process vessels; and dust explosions in food processing, grain, rubber recycling, foundry, and rubber compounding facilities.
- Designed and conducted tests to evaluate hypotheses during incident investigations, and to evaluate functionality or performance of equipment recovered from incident sites. He has developed numerous protocols for inspections and tests of evidence in-situ and in laboratories, and facilitated the execution of numerous protocols in cooperation with government and private investigators.
- He has provided incident investigation training to industry and government personnel and has led short course instruction in blast and fragmentation effects.

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BAKERRISK

QUENTIN A. BAKER, P.E.

Director – Investigation Services

Senior Principal Engineer

- Managed a number of projects to develop computer programs to calculate the blast loads on structures from high explosive, vapor cloud explosion, and bursting pressure vessel sources considering ground reflection, Mach stem formation, and receptor structure orientation. He was involved in the development of a computational fluid dynamics model to predict bursting pressure vessel and vapor cloud explosion blast parameters, and with the use of this code, developed blast curves for both classes of explosions.
- Participated on API, NFPA and ACI standards development committees including API RP-753 and RP-752, and NFPA 921, and ACI 370.
- Managed projects and was contributing author for three CCPS books related to blast predictions, facility siting and incident investigation.

Professional Chronology

Southwest Research Institute, 1978-1987; Baker Engineering and Risk Consultants, Inc., 1987- present

Professional Registrations / Certifications

- Registered Professional Engineer (Texas, Delaware, Iowa, Michigan)
- Certified Fire and Explosion Investigator (CFEI)
- Certified Fire Investigation Instructor (CFII)

Professional Memberships

- American Society of Mechanical Engineers (ASME)
- American Institute of Chemical Engineers (AIChE)
- National Fire Protection Association (NFPA)
- National Association of Fire Investigators (NAFI)
- National/Texas Society of Professional Engineers (NSPE, TSPE)

Current Committee Memberships

- NFPA 921, Guidelines for Fire and Explosion Investigations
- Mechanical Engineering Department Industry Advisory Council, Texas A&M University

Past Committee Memberships

- API Facility Siting Task Force
- CCPS Vapor Cloud Explosion Committee
- ACI Committee 370, Short Duration Dynamic and Vibratory Load Effects

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This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Zabel Freeman on behalf of Taylor Cruse
Bar No. 24107743
efile@zflawfirm.com
Envelope ID: 88576335
Filing Code Description: Original Petition (1-10 Plaintiffs) (OCA)
Filing Description: Plaintiffs' Original Petition
Status as of 6/10/2024 8:48 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Taylor Cruse-ZF		tcruse@zflawfirm.com	6/7/2024 3:09:12 PM	SENT

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C

CIVIL CASE INFORMATION SHEET

CAUSE NUMBER *(FOR CLERK USE ONLY)*: _____ **COURT *(FOR CLERK USE ONLY)*:** _____

STYLED FLNG Liquefaction, LLC, FLNG Liquefaction 2, LLC, and FLNG Liquefaction 3, LLC v. Zachry Industrial, Inc., Zachry Industries, Inc., JVIC Demerger Fabrication, Inc., Zachry Enterprise Solutions Demerger, Inc., CB&I, LLC, McDermott International Ltd., Chiyoda International Corporation, and PSRG Inc.

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:

Name: Taylor Ann Cruse
Email: tcruse@zflawfirm.com
Address: 1135 Heights Blvd.
Telephone: 281-802-9117
City/State/Zip: Houston, TX 77008
Fax: 713-802-9114
Signature: Taylor Ann Cruse
State Bar No: 24107743

Names of parties in case:

Plaintiff(s)/Petitioner(s):
FLNG Liquefaction, LLC, FLNG Liquefaction 2, LLC and FLNG Liquefaction 3, LLC

Defendant(s)/Respondent(s):
Zachry Industrial, Inc., Zachry Industries, Inc., JVIC Demerger Fabrication, Inc., Zachry Enterprise Solutions Demerger, Inc., CB&I, LLC, McDermott International Ltd., Chiyoda International Corporation, and PSRG, Inc.

[Attach additional page as necessary to list all parties]

Person or entity completing sheet is:

☑ Attorney for Plaintiff/Petitioner
☐ *Pro Se* Plaintiff/Petitioner
☐ Title IV-D Agency
☐ Other: _____

Additional Parties in Child Support Case:

Custodial Parent: _____

Non-Custodial Parent: _____

Presumed Father: _____

2. Indicate case type, or identify the most important issue in the case *(select only 1)*:

Civil

Contract

Debt/Contract
- ☐ Consumer/DTPA
- ☐ Debt/Contract
- ☐ Fraud/Misrepresentation
- ☐ Other Debt/Contract: _____

Foreclosure
- ☐ Home Equity—Expedited
- ☐ Other Foreclosure

☐ Franchise
☐ Insurance
☐ Landlord/Tenant
☐ Non-Competition
☐ Partnership
☐ Other Contract: _____

Injury or Damage

☐ Assault/Battery
☐ Construction
☐ Defamation

Malpractice
- ☐ Accounting
- ☐ Legal
- ☐ Medical
- ☐ Other Professional Liability: _____

☐ Motor Vehicle Accident
☐ Premises

Product Liability
- ☐ Asbestos/Silica
- ☐ Other Product Liability List Product: _____

☑ Other Injury or Damage: Negligent Design

Real Property

☐ Eminent Domain/ Condemnation
☐ Partition
☐ Quiet Title
☐ Trespass to Try Title
☐ Other Property: _____

Related to Criminal Matters

☐ Expunction
☐ Judgment Nisi
☐ Non-Disclosure
☐ Seizure/Forfeiture
☐ Writ of Habeas Corpus—Pre-indictment
☐ Other: _____

Employment

☐ Discrimination
☐ Retaliation
☐ Termination
☐ Workers' Compensation
☐ Other Employment: _____

Other Civil

☐ Administrative Appeal
☐ Antitrust/Unfair Competition
☐ Code Violations
☐ Foreign Judgment
☐ Intellectual Property
☐ Lawyer Discipline
☐ Perpetuate Testimony
☐ Securities/Stock
☐ Tortious Interference
☐ Other: _____

Family Law

Marriage Relationship

☐ Annulment
☐ Declare Marriage Void

Divorce
- ☐ With Children
- ☐ No Children

Post-judgment Actions (non-Title IV-D)

☐ Enforcement
☐ Modification—Custody
☐ Modification—Other

Title IV-D

☐ Enforcement/Modification
☐ Paternity
☐ Reciprocals (UIFSA)
☐ Support Order

Other Family Law

☐ Enforce Foreign Judgment
☐ Habeas Corpus
☐ Name Change
☐ Protective Order
☐ Removal of Disabilities of Minority
☐ Other: _____

Parent-Child Relationship

☐ Adoption/Adoption with Termination
☐ Child Protection
☐ Child Support
☐ Custody or Visitation
☐ Gestational Parenting
☐ Grandparent Access
☐ Parentage/Paternity
☐ Termination of Parental Rights
☐ Other Parent-Child: _____

Tax

☐ Tax Appraisal
☐ Tax Delinquency
☐ Other Tax

Probate & Mental Health

Probate/Wills/Intestate Administration
- ☐ Dependent Administration
- ☐ Independent Administration
- ☐ Other Estate Proceedings

☐ Guardianship—Adult
☐ Guardianship—Minor
☐ Mental Health
☐ Other: _____

Filed for Record
6/7/2024 11:17 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Carly Whistler, Deputy

3. Indicate procedure or remedy, if applicable *(may select more than 1)*:

- ☐ Appeal from Municipal or Justice Court
- ☐ Arbitration-related
- ☐ Attachment
- ☐ Bill of Review
- ☐ Certiorari
- ☐ Class Action
- ☐ Declaratory Judgment
- ☐ Garnishment
- ☐ Interpleader
- ☐ License
- ☐ Mandamus
- ☐ Post-judgment
- ☐ Prejudgment Remedy
- ☐ Protective Order
- ☐ Receiver
- ☐ Sequestration
- ☐ Temporary Restraining Order/Injunction
- ☐ Turnover

4. Indicate damages sought (*do not select if it is a family law case*):

- ☐ Less than $100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees
- ☐ Less than $100,000 and non-monetary relief
- ☐ Over $100, 000 but not more than $200,000
- ☐ Over $200,000 but not more than $1,000,000
- ☑ Over $1,000,000

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Zabel Freeman on behalf of Taylor Cruse
Bar No. 24107743
efile@zflawfirm.com
Envelope ID: 88576335
Filing Code Description: Original Petition (1-10 Plaintiffs) (OCA)
Filing Description: Plaintiffs' Original Petition
Status as of 6/10/2024 8:48 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Taylor Cruse-ZF		tcruse@zflawfirm.com	6/7/2024 3:09:12 PM	SENT

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D

Filed for Record
6/7/2024 11:17 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Carly Whistler, Deputy

BRAZORIA COUNTY DISTRICT CLERK
CASSANDRA TIGNER

Process Request – Please Type/Print All Information
***One request for each party being served.**

Cause No. 128933-CV

Document(s) to be Served: Plaintiffs' Original Petition and Jury Demand

Name of Party to be Served: CB&I LLC, f/k/a CBI, Inc.

Registered Agent (if applicable): C T Corporation System

Service Address: 1999 Bryan Street, Suite 900

City, State, Zip: Dallas, Texas 75201-3136, or wherever it may be found

Service by: (check one)

☐BCSO Bo Stallman
☐Constable David Thacker Pct. 1
☐Constable Willie Howell Pct. 2
☐Constable Buck Stevens Pct. 3
☐Constable James Brawner Pct. 4

☐Certified Mail ☐Restricted ☐Non-Restricted
☐Return to Attorney by Mail: _____
☑Email: tcruse@zflawfirm.com
☐Pick up by (Name): _____

☐Publication (Name & Address of Newspaper) _____
☐Publication to OCA Portal/Website #of days _____
☐Posting at Courthouse Door

Family –
Relief Requested (Required): _____
Date of Birth/Place of Birth for Each Child (Required): _____

Civil – As per TRCP 115, attach legal description of property if applicable and state relief requested.
Relief Requested (Required): _____
Property Description: _____

When Service is by SHERIFF/CONSTABLE, please provide as much information as possible by completing the blanks to expedite service.

Description:
☐Male ☐Female Date of Birth_____ Race_____ Eyes_____ Hair_____
Tattoos, Scars, Facial Hair, Glasses, etc._____
Other address person may be found: _____
Gate Access Code_____ Building Number_____
Descr. of house (i.e., trailer park, subdivision):_____
Cell/Home Phone:_____ Work Phone:_____
Any vehicles? Yr_____Make_____Model_____Color_____LP#_____
Best time to Serve: ☐Days ☐Evenings ☐Nights
Name and address of Employer:_____
List any other information the deputies should know. For example, is party being served known to be violent, owns weapons, mental or physical illness, dogs in yard, locked gates, etc.?

_____

Service requested by:

Name and Email: Taylor Ann Cruse tcruse@zflawfirm.com
Cell/Home Phone: (281) 217 - 8924 Work: (713) 554 - 0038

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BRAZORIA COUNTY DISTRICT CLERK
CASSANDRA TIGNER

Process Request – Please Type/Print All Information
***One request for each party being served.**

Cause No. 128933-CV

Document(s) to be Served: Plaintiffs' Original Petition and Jury Demand

Name of Party to be Served: CHIYODA INTERNATIONAL CORPORATION

Registered Agent (if applicable): CT Corporation System

Service Address: 1999 Bryan Street, Suite 900

City, State, Zip: Dallas, Texas 75201-3136, or wherever it may be found

Service by: (check one)

☐BCSO Bo Stallman
☐Constable David Thacker Pct. 1
☐Constable Willie Howell Pct. 2
☐Constable Buck Stevens Pct. 3
☐Constable James Brawner Pct. 4

☐Certified Mail ☐Restricted ☐Non-Restricted
☐Return to Attorney by Mail: _____
_____
☑Email: tcruse@zflawfirm.com
☐Pick up by (Name): _____

☐Publication (Name & Address of Newspaper) _____
☐Publication to OCA Portal/Website #of days _____
☐Posting at Courthouse Door

Family –
Relief Requested (Required): _____
Date of Birth/Place of Birth for Each Child (Required): _____
_____

Civil – As per TRCP 115, attach legal description of property if applicable and state relief requested.
Relief Requested (Required): _____
Property Description: _____
_____

When Service is by SHERIFF/CONSTABLE, please provide as much information as possible by completing the blanks to expedite service.

Description:
☐Male ☐Female Date of Birth_____ Race_____ Eyes_____ Hair_____
Tattoos, Scars, Facial Hair, Glasses, etc._____
Other address person may be found: _____
Gate Access Code_____ Building Number_____
Descr. of house (i.e., trailer park, subdivision):_____
Cell/Home Phone:_____ Work Phone:_____
Any vehicles? Yr_____Make_____Model_____Color_____LP#_____
Best time to Serve: ☐Days ☐Evenings ☐Nights
Name and address of Employer:_____
List any other information the deputies should know. For example, is party being served known to be violent, owns weapons, mental or physical illness, dogs in yard, locked gates, etc.?

_____

Service requested by:

Name and Email: Taylor Ann Cruse tcruse@zflawfirm.com
Cell/Home Phone: (281) 217 - 8924 Work: (713) 554 - 0038

Copy from re:SearchTX

BRAZORIA COUNTY DISTRICT CLERK
CASSANDRA TIGNER

Process Request – Please Type/Print All Information
***One request for each party being served.**

Cause No. 128933-CV

Document(s) to be Served: Plaintiffs' Original Petition and Jury Demand

Name of Party to be Served: JVIC DEMERGER FABRICATION, INC.

Registered Agent (if applicable): C T Corporation System

Service Address: 1999 Bryan Street, Suite 900

City, State, Zip: Dallas, Texas 75201-3136, or wherever it may be found

Service by: (check one)

☐BCSO Bo Stallman ☐Certified Mail ☐Restricted ☐Non-Restricted

☐Constable David Thacker Pct. 1 ☐Return to Attorney by Mail: _____

☐Constable Willie Howell Pct. 2 _____

☐Constable Buck Stevens Pct. 3 ☑Email: Tcruse@zflawfirm.com

☐Constable James Brawner Pct. 4 ☐Pick up by (Name): _____

☐Publication (Name & Address of Newspaper) _____

☐Publication to OCA Portal/Website #of days _____

☐Posting at Courthouse Door

Family –

Relief Requested (Required): _____

Date of Birth/Place of Birth for Each Child (Required): _____

_____

Civil – As per TRCP 115, attach legal description of property if applicable and state relief requested.

Relief Requested (Required): _____

Property Description: _____

_____

When Service is by SHERIFF/CONSTABLE, please provide as much information as possible by completing the blanks to expedite service.

Description:

☐Male ☐Female Date of Birth_____ Race_____ Eyes_____ Hair_____

Tattoos, Scars, Facial Hair, Glasses, etc._____

Other address person may be found: _____

Gate Access Code_____ Building Number_____

Descr. of house (i.e., trailer park, subdivision):_____

Cell/Home Phone:_____ Work Phone:_____

Any vehicles? Yr_____Make_____Model_____Color_____LP#_____

Best time to Serve: ☐Days ☐Evenings ☐Nights

Name and address of Employer:_____

List any other information the deputies should know. For example, is party being served known to be violent, owns weapons, mental or physical illness, dogs in yard, locked gates, etc.?

_____

Service requested by:

Name and Email: Taylor Ann Cruse tcruse@zflawfirm.com

Cell/Home Phone: (281) 217 - 8924 Work: (713) 554 - 0038

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BRAZORIA COUNTY DISTRICT CLERK
CASSANDRA TIGNER

Process Request – Please Type/Print All Information
***One request for each party being served.**

Cause No. 128933-CV

Document(s) to be Served: Plaintiffs' Original Petition and Jury Demand

Name of Party to be Served: McDERMOTT INTERNATIONAL, LTD.

Registered Agent (if applicable): C T Corporation System

Service Address: 1999 Bryan Street, Suite 900

City, State, Zip: Dallas, Texas 75201-3136, or wherever it may be found.

Service by: (check one)

☐BCSO Bo Stallman
☐Constable David Thacker Pct. 1
☐Constable Willie Howell Pct. 2
☐Constable Buck Stevens Pct. 3
☐Constable James Brawner Pct. 4

☐Certified Mail ☐Restricted ☐Non-Restricted
☐Return to Attorney by Mail: _____
☑Email: tcruse@zflawfirm.com
☐Pick up by (Name): _____

☐Publication (Name & Address of Newspaper) _____
☐Publication to OCA Portal/Website #of days _____
☐Posting at Courthouse Door

Family –
Relief Requested (Required): _____
Date of Birth/Place of Birth for Each Child (Required): _____

Civil – As per TRCP 115, attach legal description of property if applicable and state relief requested.
Relief Requested (Required): _____
Property Description: _____

When Service is by SHERIFF/CONSTABLE, please provide as much information as possible by completing the blanks to expedite service.

Description:
☐Male ☐Female Date of Birth_____ Race_____ Eyes_____ Hair_____
Tattoos, Scars, Facial Hair, Glasses, etc._____
Other address person may be found: _____
Gate Access Code_____ Building Number_____
Descr. of house (i.e., trailer park, subdivision):_____
Cell/Home Phone:_____ Work Phone:_____
Any vehicles? Yr_____Make_____Model_____Color_____LP#_____
Best time to Serve: ☐Days ☐Evenings ☐Nights
Name and address of Employer:_____
List any other information the deputies should know. For example, is party being served known to be violent, owns weapons, mental or physical illness, dogs in yard, locked gates, etc.?

_____

Service requested by:

Name and Email: Taylor Ann Cruse tcruse@zflawfirm.com
Cell/Home Phone: (281) 217 - 8924 Work: (713) 554 - 0038

Copy from re:SearchTX

BRAZORIA COUNTY DISTRICT CLERK
CASSANDRA TIGNER

Process Request – Please Type/Print All Information
***One request for each party being served.**

Cause No. 128933-CV
Document(s) to be Served: Plaintiffs' Original Petition and Jury Demand
Name of Party to be Served: PSRG, INC.
Registered Agent (if applicable): Robert J. Weber
Service Address: 800 West Sam Houston Parkway South, Suite 107
City, State, Zip: Houston, Texas 77042, or wherever he may be found

Service by: (check one)

☐BCSO Bo Stallman
☐Constable David Thacker Pct. 1
☐Constable Willie Howell Pct. 2
☐Constable Buck Stevens Pct. 3
☐Constable James Brawner Pct. 4

☐Certified Mail ☐Restricted ☐Non-Restricted
☐Return to Attorney by Mail: _____
☑Email: tcruse@zflawfirm.com
☐Pick up by (Name): _____

☐Publication (Name & Address of Newspaper) _____
☐Publication to OCA Portal/Website #of days _____
☐Posting at Courthouse Door

Family –
Relief Requested (Required): _____
Date of Birth/Place of Birth for Each Child (Required): _____

Civil – As per TRCP 115, attach legal description of property if applicable and state relief requested.
Relief Requested (Required): _____
Property Description: _____

When Service is by SHERIFF/CONSTABLE, please provide as much information as possible by completing the blanks to expedite service.

Description:
☐Male ☐Female Date of Birth_____ Race_____ Eyes_____ Hair_____
Tattoos, Scars, Facial Hair, Glasses, etc._____
Other address person may be found: _____
Gate Access Code_____ Building Number_____
Descr. of house (i.e., trailer park, subdivision):_____
Cell/Home Phone:_____ Work Phone:_____
Any vehicles? Yr_____Make_____Model_____Color_____LP#_____
Best time to Serve: ☐Days ☐Evenings ☐Nights
Name and address of Employer:_____
List any other information the deputies should know. For example, is party being served known to be violent, owns weapons, mental or physical illness, dogs in yard, locked gates, etc.?

_____

Service requested by:
Name and Email: Taylor Ann Cruse tcruse@zflawfirm.com
Cell/Home Phone: (281) 217 - 8924 Work: (713) 554 - 0038

Copy from re:SearchTX

BRAZORIA COUNTY DISTRICT CLERK
CASSANDRA TIGNER

Process Request – Please Type/Print All Information
***One request for each party being served.**

Cause No. 128933-CV

Document(s) to be Served: Plaintiffs' Original Petition and Jury Demand

Name of Party to be Served: ZACHRY ENTERPRISE SOLUTIONS DEMERGER, INC.

Registered Agent (if applicable): C T Corporation System

Service Address: 1999 Bryan Street, Suite 900

City, State, Zip: Dallas, Texas 75201-3136, or wherever it may be found

Service by: (check one)

☐BCSO Bo Stallman
☐Constable David Thacker Pct. 1
☐Constable Willie Howell Pct. 2
☐Constable Buck Stevens Pct. 3
☐Constable James Brawner Pct. 4

☐Certified Mail ☐Restricted ☐Non-Restricted
☐Return to Attorney by Mail: _____
☑Email: tcruse@zflawfirm.com
☐Pick up by (Name): _____

☐Publication (Name & Address of Newspaper) _____
☐Publication to OCA Portal/Website #of days _____
☐Posting at Courthouse Door

Family –
Relief Requested (Required): _____
Date of Birth/Place of Birth for Each Child (Required): _____

Civil – As per TRCP 115, attach legal description of property if applicable and state relief requested.
Relief Requested (Required): _____
Property Description: _____

When Service is by SHERIFF/CONSTABLE, please provide as much information as possible by completing the blanks to expedite service.

Description:
☐Male ☐Female Date of Birth_____ Race_____ Eyes_____ Hair_____
Tattoos, Scars, Facial Hair, Glasses, etc._____
Other address person may be found: _____
Gate Access Code_____ Building Number_____
Descr. of house (i.e., trailer park, subdivision):_____
Cell/Home Phone:_____ Work Phone:_____
Any vehicles? Yr_____Make_____Model_____Color_____LP#_____
Best time to Serve: ☐Days ☐Evenings ☐Nights
Name and address of Employer:_____
List any other information the deputies should know. For example, is party being served known to be violent, owns weapons, mental or physical illness, dogs in yard, locked gates, etc.?

_____

Service requested by:

Name and Email: Taylor Ann Cruse tcruse@zflawfirm.com
Cell/Home Phone: (281) 217 - 8924 Work: (713) 554 - 0038

Copy from re:SearchTX

BRAZORIA COUNTY DISTRICT CLERK
CASSANDRA TIGNER

Process Request – Please Type/Print All Information
***One request for each party being served.**

Cause No. 128933-CV
Document(s) to be Served: Plaintiffs' Original Petition and Jury Demand
Name of Party to be Served: ZACHRY INDUSTRIAL, INC.
Registered Agent (if applicable): C T Corporation System
Service Address: 1999 Bryan Street, Suite 900
City, State, Zip: Dallas, Texas 75201-3136, or wherever it may be found

Service by: (check one)

☐BCSO Bo Stallman
☐Constable David Thacker Pct. 1
☐Constable Willie Howell Pct. 2
☐Constable Buck Stevens Pct. 3
☐Constable James Brawner Pct. 4

☐Certified Mail ☐Restricted ☐Non-Restricted
☐Return to Attorney by Mail: _____
☑Email: tcruse@zflawfirm.com
☐Pick up by (Name): _____

☐Publication (Name & Address of Newspaper) _____
☐Publication to OCA Portal/Website #of days _____
☐Posting at Courthouse Door

Family –
Relief Requested (Required): _____
Date of Birth/Place of Birth for Each Child (Required): _____

Civil – As per TRCP 115, attach legal description of property if applicable and state relief requested.
Relief Requested (Required): _____
Property Description: _____

When Service is by SHERIFF/CONSTABLE, please provide as much information as possible by completing the blanks to expedite service.

Description:
☐Male ☐Female Date of Birth_____ Race_____ Eyes_____ Hair_____
Tattoos, Scars, Facial Hair, Glasses, etc._____
Other address person may be found: _____
Gate Access Code_____ Building Number_____
Descr. of house (i.e., trailer park, subdivision):_____
Cell/Home Phone:_____ Work Phone:_____
Any vehicles? Yr_____Make_____Model_____Color_____LP#_____
Best time to Serve: ☐Days ☐Evenings ☐Nights
Name and address of Employer:_____
List any other information the deputies should know. For example, is party being served known to be violent, owns weapons, mental or physical illness, dogs in yard, locked gates, etc.?

_____

Service requested by:
Name and Email: Taylor Ann Cruse tcruse@zflawfirm.com
Cell/Home Phone: (281) 217 - 8924 Work: (713) 554 - 0038

Copy from re:SearchTX

BRAZORIA COUNTY DISTRICT CLERK
CASSANDRA TIGNER

Process Request – Please Type/Print All Information
***One request for each party being served.**

Cause No. 128933-CV
Document(s) to be Served: Plaintiffs' Original Petition and Jury Demand
Name of Party to be Served: ZACHRY INDUSTRIES, INC.
Registered Agent (if applicable): C T Corporation System
Service Address: 1999 Bryan Street, Suite 900
City, State, Zip: Dallas, Texas 75201-3136, or wherever it may be found

Service by: (check one)

☐BCSO Bo Stallman
☐Constable David Thacker Pct. 1
☐Constable Willie Howell Pct. 2
☐Constable Buck Stevens Pct. 3
☐Constable James Brawner Pct. 4

☐Certified Mail ☐Restricted ☐Non-Restricted
☐Return to Attorney by Mail: _____
☑Email: tcruse@zflawfirm.com
☐Pick up by (Name): _____

☐Publication (Name & Address of Newspaper) _____
☐Publication to OCA Portal/Website #of days _____
☐Posting at Courthouse Door

Family –
Relief Requested (Required): _____
Date of Birth/Place of Birth for Each Child (Required): _____

Civil – As per TRCP 115, attach legal description of property if applicable and state relief requested.
Relief Requested (Required): _____
Property Description: _____

When Service is by SHERIFF/CONSTABLE, please provide as much information as possible by completing the blanks to expedite service.

Description:
☐Male ☐Female Date of Birth_____ Race_____ Eyes_____ Hair_____
Tattoos, Scars, Facial Hair, Glasses, etc._____
Other address person may be found: _____
Gate Access Code_____ Building Number_____
Descr. of house (i.e., trailer park, subdivision):_____
Cell/Home Phone:_____ Work Phone:_____
Any vehicles? Yr_____Make_____Model_____Color_____LP#_____
Best time to Serve: ☐Days ☐Evenings ☐Nights
Name and address of Employer:_____
List any other information the deputies should know. For example, is party being served known to be violent, owns weapons, mental or physical illness, dogs in yard, locked gates, etc.?

_____

Service requested by:
Name and Email: Taylor Ann Cruse tcruse@zflawfirm.com
Cell/Home Phone: (281) 217 - 8924 Work: (713) 554 - 0038

Copy from re:SearchTX

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Zabel Freeman on behalf of Taylor Cruse
Bar No. 24107743
efile@zflawfirm.com
Envelope ID: 88576335
Filing Code Description: Original Petition (1-10 Plaintiffs) (OCA)
Filing Description: Plaintiffs' Original Petition
Status as of 6/10/2024 8:48 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Taylor Cruse-ZF		tcruse@zflawfirm.com	6/7/2024 3:09:12 PM	SENT

Copy from re:SearchTX

E

Filed for Record
6/18/2024 11:26 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Jessica Ochs, Deputy

CAUSE NO. 128933-CV
412th District Court

THE STATE OF TEXAS CITATION

TO: **CB&I, LLC, f/k/a CBI, Inc.** Defendant
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the Clerk who issued this Citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this **Citation** and **Plaintiff's Original Petition and Jury Demand** a Default Judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. If filing Pro se, said answer may be filed by mailing same to: Brazoria County District Clerk's office, 111 E. Locust, Suite 304, Angleton, TX 77515-4678 or by bringing said answer in person to the aforementioned address.

The case is presently pending before the **412th District Court** of Brazoria County sitting in Angleton, Texas, and was filed on the **7th day of June, 2024.** It bears Cause No. **128933-CV** and Styled:

FLNG Liquefaction, LLC; FLNG Liquefacation 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.

The name and address of the Attorney filing this action (or Party, if Pro Se) is **Richard T. Fass**, **Zabel Freeman, 1135 Heights Boulevard, Houston, Texas 77008.**

The nature of the demands of said Plaintiff is shown by a true and correct copy of Plaintiff's Petition accompanying this Citation.

Issued under my hand and the seal of said Court, at Angleton, Texas, on the **11th day of June, 2024.**

CASSANDRA TIGNER, DISTRICT CLERK
Brazoria County, Texas

By _____, Deputy
Digitally signed by Jessica Ochs
Date: 2024.06.11 10:55:44 -05'00'
Jessica Ochs

DISTRICT COURT ★ BRAZORIA COUNTY, TEXAS ★

Original

Citation by Registered Agent

Copy from re:SearchTX

RETURN OF SERVICE

CAUSE NO. 128933-CV 412th District Court

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACATION 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.

CB&I, LLC, f/k/a CBI, Inc.
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

Came to hand on the _____ day of _____, 20___ at _____, o'clock ____.m., and executed in _____ County, Texas by delivering to each of the within named parties in person, a true copy of this CITATION with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Original Petition and Jury Demand at the following times and places, to-wit:

NAME	DATE	TIME	PLACE, COURSE, AND DISTANCE FROM COURTHOUSE	MILEAGE

and not executed as to (NAME)_____

and the cause or failure to execute this process is for the following reason: _____

_____

The diligence used in finding said (NAME) being: _____

FEES:
Serving Citation and Copy $_____ _____, Officer
Mileage: _____ miles @ $_____ per mile $_____ _____ County, Texas
Total $_____ _____
Deputy/Authorized Person

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.
In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is _____, my date of birth is _____, and my
(First, Middle, Last)
address is_____
(Street, City, State, Zip Code, Country)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the ____ day of _____, 20__.

_____
Declarant/Authorized Process Server

_____
(Id No. and expiration of certification)

Copy from re:SearchTX

CAUSE NUMBER: 128933-CV

FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, AND FLNG LIQUEFACTION 3, LLC
PLAINTIFF

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.
DEFENDANT

IN THE 412TH JUDICIAL DISTRICT COURT OF BRAZORIA COUNTY, TEXAS

RETURN OF SERVICE

My name is **GUY CONNELLY**. I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is: 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A.

ON **Monday June 17, 2024 AT 11:15 AM - CITATION**, **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND; EXHIBIT A-CERTIFICATE OF MERIT OF QUENTIN BAKER, P.E.** came to hand for service upon **CB&I, LLC, F/K/A CBI, INC. BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM**.

On **Monday June 17, 2024** at **02:45 PM -** The above named documents were hand delivered to: **CB&I, LLC, F/K/A CBI, INC. BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM BY DELIVERING TO TERRI THONGSAVAT, INTAKE SPECIALIST @ 1999 BRYAN STREET, SUITE 900**, **DALLAS**, **TX 75201**, **in Person.**

FURTHER AFFIANT SAYETH NOT.

STATE OF TEXAS DECLARATION

"My name is **GUY CONNELLY,** my date of birth is 11/04/1951 my business address is 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A., and I declare under penalty of perjury that this affidavit is true and correct."

Executed in **Collin County, State of Texas on Monday June 17, 2024**



PSC#2201 EXP. 09/30/24
Declarant; Appointed in accordance with State Statutes.

2024.06.892599

efile@courtrecords.com

Copy from re:SearchTX

F

Filed for Record
6/18/2024 11:32 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Jessica Ochs, Deputy

CAUSE NO. 128933-CV
412th District Court

THE STATE OF TEXAS — CITATION

TO: **McDermott International, Ltd.** — Defendant
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the Clerk who issued this Citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this **Citation** and **Plaintiff's Original Petition and Jury Demand** a Default Judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. If filing Pro se, said answer may be filed by mailing same to: Brazoria County District Clerk's office, 111 E. Locust, Suite 304, Angleton, TX 77515-4678 or by bringing said answer in person to the aforementioned address.

The case is presently pending before the **412th District Court** of Brazoria County sitting in Angleton, Texas, and was filed on the **7th day of June, 2024.** It bears Cause No. **128933-CV** and Styled:

FLNG Liquefaction, LLC; FLNG Liquefacation 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.

The name and address of the Attorney filing this action (or Party, if Pro Se) is **Richard T. Fass**, **Zabel Freeman, 1135 Heights Boulevard, Houston, Texas 77008.**

The nature of the demands of said Plaintiff is shown by a true and correct copy of Plaintiff's Petition accompanying this Citation.

Issued under my hand and the seal of said Court, at Angleton, Texas, on the **11th day of June, 2024.**

CASSANDRA TIGNER, DISTRICT CLERK
Brazoria County, Texas

By _____, Deputy
Digitally signed by Jessica Ochs
Date: 2024.06.11 11:09:37 -05'00'
Jessica Ochs

DISTRICT COURT ★ BRAZORIA COUNTY, TEXAS ★

Original

Citation by Registered Agent

Copy from re:SearchTX

RETURN OF SERVICE

CAUSE NO. 128933-CV 412th District Court

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACATION 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.

McDermott International, Ltd.
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

Came to hand on the _____ day of _____, 20___ at _____, o'clock ____.m., and executed in _____ County, Texas by delivering to each of the within named parties in person, a true copy of this CITATION with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Original Petition and Jury Demand at the following times and places, to-wit:

NAME	DATE	TIME	PLACE, COURSE, AND DISTANCE FROM COURTHOUSE	MILEAGE

and not executed as to (NAME)_____

and the cause or failure to execute this process is for the following reason: _____

_____

The diligence used in finding said (NAME) being: _____

FEES:
Serving Citation and Copy $_____ _____, Officer
Mileage: _____ miles @ $_____ per mile $_____ _____ County, Texas
Total $_____ _____
Deputy/Authorized Person

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.
In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is _____, my date of birth is _____, and my
(First, Middle, Last)
address is_____
(Street, City, State, Zip Code, Country)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the ____ day of _____, 20__.

_____
Declarant/Authorized Process Server

_____
(Id No. and expiration of certification)

Copy from re:SearchTX

CAUSE NUMBER: 128933-CV

FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, AND FLNG LIQUEFACTION 3, LLC
PLAINTIFF

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.
DEFENDANT

IN THE 412TH JUDICIAL DISTRICT COURT OF BRAZORIA COUNTY, TEXAS

RETURN OF SERVICE

My name is **GUY CONNELLY**. I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is: 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A.

ON **Monday June 17, 2024 AT 11:15 AM - CITATION**, **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND; EXHIBIT A-CERTIFICATE OF MERIT OF QUENTIN BAKER, P.E.** came to hand for service upon **MCDERMOTT INTERNATIONAL, LTD BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM**.

On **Monday June 17, 2024** at **02:45 PM -** The above named documents were hand delivered to: **MCDERMOTT INTERNATIONAL, LTD BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM BY DELIVERING TO TERRI THONGSAVAT, INTAKE SPECIALIST @ 1999 BRYAN STREET, SUITE 900**, **DALLAS**, **TX 75201**, **in Person.**

FURTHER AFFIANT SAYETH NOT.

STATE OF TEXAS DECLARATION

"My name is **GUY CONNELLY,** my date of birth is 11/04/1951 my business address is 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A., and I declare under penalty of perjury that this affidavit is true and correct."

Executed in **Collin County, State of Texas on Monday June 17, 2024**



PSC#2201 EXP. 09/30/24
Declarant; Appointed in accordance with State Statutes.

2024.06.892593

Copy from re:SearchTX

G

Filed for Record
6/18/2024 11:38 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Cathy Richard, Deputy

CAUSE NO. 128933-CV
412th District Court

THE STATE OF TEXAS CITATION

TO: **Chiyoda International Corporation** Defendant
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the Clerk who issued this Citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this **Citation** and **Plaintiff's Original Petition and Jury Demand** a Default Judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. If filing Pro se, said answer may be filed by mailing same to: Brazoria County District Clerk's office, 111 E. Locust, Suite 304, Angleton, TX 77515-4678 or by bringing said answer in person to the aforementioned address.

The case is presently pending before the **412th District Court** of Brazoria County sitting in Angleton, Texas, and was filed on the **7th day of June, 2024.** It bears Cause No. **128933-CV** and Styled:

FLNG Liquefaction, LLC; FLNG Liquefacation 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.

The name and address of the Attorney filing this action (or Party, if Pro Se) is **Richard T. Fass**, **Zabel Freeman, 1135 Heights Boulevard, Houston, Texas 77008.**

The nature of the demands of said Plaintiff is shown by a true and correct copy of Plaintiff's Petition accompanying this Citation.

Issued under my hand and the seal of said Court, at Angleton, Texas, on the **11th day of June, 2024.**

CASSANDRA TIGNER, DISTRICT CLERK
Brazoria County, Texas

By _____, Deputy
Digitally signed by Jessica Ochs
Date: 2024.06.11 11:00:49 -05'00'
Jessica Ochs

DISTRICT COURT ★ BRAZORIA COUNTY, TEXAS ★

Original

Citation by Registered Agent

Copy from re:SearchTX

RETURN OF SERVICE

CAUSE NO. 128933-CV 412th District Court

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACATION 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.

Chiyoda International Corporation
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

Came to hand on the _____ day of _____, 20___ at _____, o'clock ____.m., and executed in _____ County, Texas by delivering to each of the within named parties in person, a true copy of this CITATION with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Original Petition and Jury Demand at the following times and places, to-wit:

NAME	DATE	TIME	PLACE, COURSE, AND DISTANCE FROM COURTHOUSE	MILEAGE

and not executed as to (NAME)_____

and the cause or failure to execute this process is for the following reason: _____

_____

The diligence used in finding said (NAME) being: _____

FEES:
Serving Citation and Copy $_____ _____, Officer
Mileage: _____ miles @ $_____ per mile $_____ _____ County, Texas
Total $_____ _____
Deputy/Authorized Person

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.
In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is _____, my date of birth is _____, and my
(First, Middle, Last)
address is_____
(Street, City, State, Zip Code, Country)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the ____ day of _____, 20__.

_____
Declarant/Authorized Process Server

_____
(Id No. and expiration of certification)

Copy from re:SearchTX

CAUSE NUMBER: 128933-CV

FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, AND FLNG LIQUEFACTION 3, LLC
PLAINTIFF

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.
DEFENDANT

IN THE 412TH JUDICIAL DISTRICT COURT OF BRAZORIA COUNTY, TEXAS

RETURN OF SERVICE

My name is **GUY CONNELLY**. I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is: 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A.

ON **Monday June 17, 2024 AT 11:15 AM - CITATION**, **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND; EXHIBIT A-CERTIFICATE OF MERIT OF QUENTIN BAKER, P.E.** came to hand for service upon **CHIYODA INTERNATIONAL CORPORATION BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM**.

On **Monday June 17, 2024** at **02:45 PM -** The above named documents were hand delivered to: **CHIYODA INTERNATIONAL CORPORATION BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM BY DELIVERING TO TERRI THONGSAVAT, INTAKE SPECIALIST @ 1999 BRYAN STREET, SUITE 900**, **DALLAS**, **TX 75201**, **in Person.**

FURTHER AFFIANT SAYETH NOT.

STATE OF TEXAS DECLARATION

"My name is **GUY CONNELLY,** my date of birth is 11/04/1951 my business address is 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A., and I declare under penalty of perjury that this affidavit is true and correct."

Executed in **Collin County, State of Texas on Monday June 17, 2024**



PSC#2201 EXP. 09/30/24
Declarant; Appointed in accordance with State Statutes.

2024.06.892590

efile@courtrecords.com

Copy from re:SearchTX

H

Filed for Record
6/18/2024 11:41 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Cathy Richard, Deputy

CAUSE NO. 128933-CV
412th District Court

THE STATE OF TEXAS CITATION

TO: **Zachry Industries, Inc.** Defendant
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the Clerk who issued this Citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this **Citation** and **Plaintiff's Original Petition and Jury Demand** a Default Judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. If filing Pro se, said answer may be filed by mailing same to: Brazoria County District Clerk's office, 111 E. Locust, Suite 304, Angleton, TX 77515-4678 or by bringing said answer in person to the aforementioned address.

The case is presently pending before the **412th District Court** of Brazoria County sitting in Angleton, Texas, and was filed on the **7th day of June, 2024.** It bears Cause No. **128933-CV** and Styled:

FLNG Liquefaction, LLC; FLNG Liquefacation 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.

The name and address of the Attorney filing this action (or Party, if Pro Se) is **Richard T. Fass**, **Zabel Freeman, 1135 Heights Boulevard, Houston, Texas 77008.**

The nature of the demands of said Plaintiff is shown by a true and correct copy of Plaintiff's Petition accompanying this Citation.

Issued under my hand and the seal of said Court, at Angleton, Texas, on the **11th day of June, 2024.**

CASSANDRA TIGNER, DISTRICT CLERK
Brazoria County, Texas

By _____, Deputy
Digitally signed by Jessica Ochs
Date: 2024.06.11 11:36:56 -05'00'
Jessica Ochs

DISTRICT COURT ★ BRAZORIA COUNTY, TEXAS ★

Original

Citation by Registered Agent

Copy from re:SearchTX

RETURN OF SERVICE

CAUSE NO. 128933-CV 412th District Court

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACATION 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.

Zachry Industries, Inc.
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

Came to hand on the _____ day of _____, 20___ at _____, o'clock ____.m., and executed in _____ County, Texas by delivering to each of the within named parties in person, a true copy of this CITATION with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Original Petition and Jury Demand at the following times and places, to-wit:

NAME	DATE	TIME	PLACE, COURSE, AND DISTANCE FROM COURTHOUSE	MILEAGE

and not executed as to (NAME)_____

and the cause or failure to execute this process is for the following reason: _____

_____

The diligence used in finding said (NAME) being: _____

FEES:
Serving Citation and Copy $_____ _____, Officer
Mileage: _____ miles @ $_____ per mile $_____ _____ County, Texas
Total $_____ _____
Deputy/Authorized Person

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.
In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is _____, my date of birth is _____, and my
(First, Middle, Last)
address is_____
(Street, City, State, Zip Code, Country)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the ____ day of _____, 20__.

_____
Declarant/Authorized Process Server

_____
(Id No. and expiration of certification)

Copy from re:SearchTX

CAUSE NUMBER: 128933-CV

FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, AND FLNG LIQUEFACTION 3, LLC
PLAINTIFF

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.
DEFENDANT

IN THE 412TH JUDICIAL DISTRICT COURT OF BRAZORIA COUNTY, TEXAS

RETURN OF SERVICE

My name is **GUY CONNELLY**. I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is: 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A.

ON **Monday June 17, 2024 AT 11:15 AM - CITATION**, **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND; EXHIBIT A-CERTIFICATE OF MERIT OF QUENTIN BAKER, P.E.** came to hand for service upon **ZACHRY INDUSTRIES, INC BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM**.

On **Monday June 17, 2024** at **02:45 PM -** The above named documents were hand delivered to: **ZACHRY INDUSTRIES, INC BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM BY DELIVERING TO TERRI THONGSAVAT, INTAKE SPECIALIST @ 1999 BRYAN STREET, SUITE 900**, **DALLAS**, **TX 75201**, **in Person.**

FURTHER AFFIANT SAYETH NOT.

STATE OF TEXAS DECLARATION

"My name is **GUY CONNELLY,** my date of birth is 11/04/1951 my business address is 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A., and I declare under penalty of perjury that this affidavit is true and correct."

Executed in **Collin County, State of Texas on Monday June 17, 2024**



PSC#2201 EXP. 09/30/24
Declarant; Appointed in accordance with State Statutes.

2024.06.892617

efile@courtrecords.com

Copy from re:SearchTX

I

Filed for Record
6/18/2024 11:45 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Carly Whistler, Deputy

CAUSE NO. 128933-CV
412th District Court

THE STATE OF TEXAS CITATION

TO: **JVIC Demerger Fabrication, Inc.** Defendant
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the Clerk who issued this Citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this **Citation** and **Plaintiff's Original Petition and Jury Demand** a Default Judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. If filing Pro se, said answer may be filed by mailing same to: Brazoria County District Clerk's office, 111 E. Locust, Suite 304, Angleton, TX 77515-4678 or by bringing said answer in person to the aforementioned address.

The case is presently pending before the **412th District Court** of Brazoria County sitting in Angleton, Texas, and was filed on the **7th day of June, 2024.** It bears Cause No. **128933-CV** and Styled:

FLNG Liquefaction, LLC; FLNG Liquefacation 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.

The name and address of the Attorney filing this action (or Party, if Pro Se) is **Richard T. Fass**, **Zabel Freeman, 1135 Heights Boulevard, Houston, Texas 77008.**

The nature of the demands of said Plaintiff is shown by a true and correct copy of Plaintiff's Petition accompanying this Citation.

Issued under my hand and the seal of said Court, at Angleton, Texas, on the **11th day of June, 2024.**

CASSANDRA TIGNER, DISTRICT CLERK
Brazoria County, Texas

By _____, Deputy
Digitally signed by Jessica Ochs
Date: 2024.06.11 11:05:51 -05'00'
Jessica Ochs

DISTRICT COURT ★ BRAZORIA COUNTY, TEXAS ★

Original

Citation by Registered Agent

Copy from re:SearchTX

RETURN OF SERVICE

CAUSE NO. 128933-CV 412th District Court

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACATION 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.

JVIC Demerger Fabrication, Inc.
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

Came to hand on the _____ day of _____, 20___ at _____, o'clock ____.m., and executed in _____ County, Texas by delivering to each of the within named parties in person, a true copy of this CITATION with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Original Petition and Jury Demand at the following times and places, to-wit:

NAME	DATE	TIME	PLACE, COURSE, AND DISTANCE FROM COURTHOUSE	MILEAGE

and not executed as to (NAME)_____

and the cause or failure to execute this process is for the following reason: _____

_____

The diligence used in finding said (NAME) being: _____

FEES:
Serving Citation and Copy $_____ _____, Officer
Mileage: _____ miles @ $_____ per mile $_____ _____ County, Texas
Total $_____ _____
Deputy/Authorized Person

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.
In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is _____, my date of birth is _____, and my
(First, Middle, Last)
address is_____
(Street, City, State, Zip Code, Country)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the ____ day of _____, 20__.

_____
Declarant/Authorized Process Server

_____
(Id No. and expiration of certification)

Copy from re:SearchTX

CAUSE NUMBER: 128933-CV

FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, AND FLNG LIQUEFACTION 3, LLC
PLAINTIFF

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.
DEFENDANT

IN THE 412TH JUDICIAL DISTRICT COURT OF BRAZORIA COUNTY, TEXAS

RETURN OF SERVICE

My name is **GUY CONNELLY**. I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is: 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A.

ON **Monday June 17, 2024 AT 11:15 AM - CITATION**, **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND; EXHIBIT A-CERTIFICATE OF MERIT OF QUENTIN BAKER, P.E.** came to hand for service upon **JVIC DEMERGER FABRICATION, INC. BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM**.

On **Monday June 17, 2024** at **02:45 PM -** The above named documents were hand delivered to: **JVIC DEMERGER FABRICATION, INC. BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM BY DELIVERING TO TERRI THONGSAVAT, INTAKE SPECIALIST @ 1999 BRYAN STREET, SUITE 900**, **DALLAS**, **TX 75201**, **in Person.**

FURTHER AFFIANT SAYETH NOT.

STATE OF TEXAS DECLARATION

"My name is **GUY CONNELLY,** my date of birth is 11/04/1951 my business address is 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A., and I declare under penalty of perjury that this affidavit is true and correct."

Executed in **Collin County, State of Texas on Monday June 17, 2024**



PSC#2201 EXP. 09/30/24
Declarant; Appointed in accordance with State Statutes.

2024.06.892608

efile@courtrecords.com

Copy from re:SearchTX

J

Filed for Record
6/18/2024 11:49 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Carly Whistler, Deputy

CAUSE NO. 128933-CV
412th District Court

THE STATE OF TEXAS — CITATION

TO: **Zachry Enterprise Solutions Demerger, Inc.** — Defendant
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the Clerk who issued this Citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this **Citation** and **Plaintiff's Original Petition and Jury Demand** a Default Judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. If filing Pro se, said answer may be filed by mailing same to: Brazoria County District Clerk's office, 111 E. Locust, Suite 304, Angleton, TX 77515-4678 or by bringing said answer in person to the aforementioned address.

The case is presently pending before the **412th District Court** of Brazoria County sitting in Angleton, Texas, and was filed on the **7th day of June, 2024.** It bears Cause No. **128933-CV** and Styled:

FLNG Liquefaction, LLC; FLNG Liquefacation 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.

The name and address of the Attorney filing this action (or Party, if Pro Se) is **Richard T. Fass**, **Zabel Freeman, 1135 Heights Boulevard, Houston, Texas 77008.**

The nature of the demands of said Plaintiff is shown by a true and correct copy of Plaintiff's Petition accompanying this Citation.

Issued under my hand and the seal of said Court, at Angleton, Texas, on the **11th day of June, 2024.**

CASSANDRA TIGNER, DISTRICT CLERK
Brazoria County, Texas

By _____, Deputy
Digitally signed by Jessica Ochs
Date: 2024.06.11 11:22:04 -05'00'
Jessica Ochs

DISTRICT COURT ★ BRAZORIA COUNTY, TEXAS ★

Original

Copy from re:SearchTX

RETURN OF SERVICE

CAUSE NO. 128933-CV 412th District Court

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACATION 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.

Zachry Enterprise Solutions Demerger, Inc.
By serving its Registered Agent
C T Corporation System
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

Came to hand on the _____ day of _____, 20___ at _____, o'clock ____.m., and executed in _____ County, Texas by delivering to each of the within named parties in person, a true copy of this CITATION with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Original Petition and Jury Demand at the following times and places, to-wit:

NAME	DATE	TIME	PLACE, COURSE, AND DISTANCE FROM COURTHOUSE	MILEAGE

and not executed as to (NAME)_____

and the cause or failure to execute this process is for the following reason: _____

_____

The diligence used in finding said (NAME) being: _____

FEES:
Serving Citation and Copy $_____ _____, Officer
Mileage: _____ miles @ $_____ per mile $_____ _____ County, Texas
Total $_____ _____
Deputy/Authorized Person

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.
In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is _____, my date of birth is _____, and my
(First, Middle, Last)
address is_____
(Street, City, State, Zip Code, Country)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the ____ day of _____, 20__.

_____
Declarant/Authorized Process Server

_____
(Id No. and expiration of certification)

Copy from re:SearchTX

CAUSE NUMBER: 128933-CV

FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, AND FLNG LIQUEFACTION 3, LLC
PLAINTIFF

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.
DEFENDANT

IN THE 412TH JUDICIAL DISTRICT COURT OF BRAZORIA COUNTY, TEXAS

RETURN OF SERVICE

My name is **GUY CONNELLY**. I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is: 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A.

ON **Monday June 17, 2024 AT 11:15 AM - CITATION**, **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND; EXHIBIT A-CERTIFICATE OF MERIT OF QUENTIN BAKER, P.E.** came to hand for service upon **ZACHRY ENTERPRISE SOLUTIONS DEMERGER, INC BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM**.

On **Monday June 17, 2024** at **02:45 PM -** The above named documents were hand delivered to: **ZACHRY ENTERPRISE SOLUTIONS DEMERGER, INC BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM BY DELIVERING TO TERRI THONGSAVAT, INTAKE SPECIALIST @ 1999 BRYAN STREET, SUITE 900**, **DALLAS**, **TX 75201**, **in Person.**

FURTHER AFFIANT SAYETH NOT.

STATE OF TEXAS DECLARATION

"My name is **GUY CONNELLY,** my date of birth is 11/04/1951 my business address is 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A., and I declare under penalty of perjury that this affidavit is true and correct."

Executed in **Collin County, State of Texas on Monday June 17, 2024**



PSC#2201 EXP. 09/30/24
Declarant; Appointed in accordance with State Statutes.

2024.06.892602

efile@courtrecords.com

Copy from re:SearchTX

K

Filed for Record
6/18/2024 11:52 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Carly Whistler, Deputy

CAUSE NO. 128933-CV
412th District Court

THE STATE OF TEXAS — CITATION

TO: **Zachry Industrial, Inc.** — Defendant
By serving its Registered Agent
C T Corporation Systems
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the Clerk who issued this Citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this **Citation** and **Plaintiff's Original Petition and Jury Demand** a Default Judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. If filing Pro se, said answer may be filed by mailing same to: Brazoria County District Clerk's office, 111 E. Locust, Suite 304, Angleton, TX 77515-4678 or by bringing said answer in person to the aforementioned address.

The case is presently pending before the **412th District Court** of Brazoria County sitting in Angleton, Texas, and was filed on the **7th day of June, 2024.** It bears Cause No. **128933-CV** and Styled:

FLNG Liquefaction, LLC; FLNG Liquefacation 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.

The name and address of the Attorney filing this action (or Party, if Pro Se) is **Richard T. Fass**, **Zabel Freeman, 1135 Heights Boulevard, Houston, Texas 77008.**

The nature of the demands of said Plaintiff is shown by a true and correct copy of Plaintiff's Petition accompanying this Citation.

Issued under my hand and the seal of said Court, at Angleton, Texas, on the **11th day of June, 2024.**

CASSANDRA TIGNER, DISTRICT CLERK
Brazoria County, Texas

By _____, Deputy
Digitally signed by Jessica Ochs
Date: 2024.06.11 11:32:48 -05'00'
Jessica Ochs

DISTRICT COURT ★ BRAZORIA COUNTY, TEXAS ★

Original

Citation by Registered Agent

Copy from re:SearchTX

RETURN OF SERVICE

CAUSE NO. 128933-CV 412th District Court

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACATION 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.

Zachry Industrial, Inc.
By serving its Registered Agent
C T Corporation Systems
1999 Bryan Street, Suite 900
Dallas, Texas 75201-3136, or wherever it may be found

Came to hand on the _____ day of _____, 20___ at _____, o'clock ____.m., and executed in _____ County, Texas by delivering to each of the within named parties in person, a true copy of this CITATION with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Original Petition and Jury Demand at the following times and places, to-wit:

NAME	DATE	TIME	PLACE, COURSE, AND DISTANCE FROM COURTHOUSE	MILEAGE

and not executed as to (NAME)_____

and the cause or failure to execute this process is for the following reason: _____

_____

The diligence used in finding said (NAME) being: _____

FEES:
Serving Citation and Copy $_____ _____, Officer
Mileage: _____ miles @ $_____ per mile $_____ _____ County, Texas
Total $_____ _____
Deputy/Authorized Person

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.
In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is _____, my date of birth is _____, and my
(First, Middle, Last)
address is_____
(Street, City, State, Zip Code, Country)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the ____ day of _____, 20__.

_____
Declarant/Authorized Process Server

_____
(Id No. and expiration of certification)

Copy from re:SearchTX

CAUSE NUMBER: 128933-CV

FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, AND FLNG LIQUEFACTION 3, LLC
PLAINTIFF

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.
DEFENDANT

IN THE 412TH JUDICIAL DISTRICT COURT OF BRAZORIA COUNTY, TEXAS

RETURN OF SERVICE

My name is **GUY CONNELLY**. I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is: 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A.

ON **Monday June 17, 2024 AT 11:15 AM - CITATION**, **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND; EXHIBIT A-CERTIFICATE OF MERIT OF QUENTIN BAKER, P.E.** came to hand for service upon **ZACHRY INDUSTRIAL, INC. BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM**.

On **Monday June 17, 2024** at **02:45 PM -** The above named documents were hand delivered to: **ZACHRY INDUSTRIAL, INC. BY SERVING ITS REGISTERED AGENT C T CORPORATION SYSTEM BY DELIVERING TO TERRI THONGSAVAT, INTAKE SPECIALIST @ 1999 BRYAN STREET, SUITE 900**, **DALLAS**, **TX 75201**, **in Person.**

FURTHER AFFIANT SAYETH NOT.

STATE OF TEXAS DECLARATION

"My name is **GUY CONNELLY,** my date of birth is 11/04/1951 my business address is 207 S. BUFFALO ST. #77 , CANTON TX , 75103, U.S.A., and I declare under penalty of perjury that this affidavit is true and correct."

Executed in **Collin County, State of Texas on Monday June 17, 2024**



PSC#2201 EXP. 09/30/24
Declarant; Appointed in accordance with State Statutes.

2024.06.892623

efile@courtrecords.com

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Filed for Record
6/24/2024 2:44 PM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128933-CV
Acacia Austin, Deputy

CAUSE NO. 128933-CV
412th District Court

THE STATE OF TEXAS CITATION

TO: **PSRG, Inc.** Defendant
By serving its Registered Agent
Robert J. Weber
800 West Sam Houston Parkway South, Suite 107
Houston, Texas 77042, or wherever he may be found

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the Clerk who issued this Citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this **Citation** and **Plaintiff's Original Petition and Jury Demand** a Default Judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. If filing Pro se, said answer may be filed by mailing same to: Brazoria County District Clerk's office, 111 E. Locust, Suite 304, Angleton, TX 77515-4678 or by bringing said answer in person to the aforementioned address.

The case is presently pending before the **412th District Court** of Brazoria County sitting in Angleton, Texas, and was filed on the **7th day of June, 2024.** It bears Cause No. **128933-CV** and Styled:

FLNG Liquefaction, LLC; FLNG Liquefacation 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.

The name and address of the Attorney filing this action (or Party, if Pro Se) is **Richard T. Fass**, **Zabel Freeman, 1135 Heights Boulevard, Houston, Texas 77008.**

The nature of the demands of said Plaintiff is shown by a true and correct copy of Plaintiff's Petition accompanying this Citation.

Issued under my hand and the seal of said Court, at Angleton, Texas, on the **11th day of June, 2024.**

CASSANDRA TIGNER, DISTRICT CLERK
Brazoria County, Texas

By _____, Deputy
Digitally signed by Jessica Ochs
Date: 2024.06.11 11:14:17 -05'00'
Jessica Ochs

DISTRICT COURT ★ BRAZORIA COUNTY, TEXAS ★

Original

Citation by Registered Agent

Copy from re:SearchTX

RETURN OF SERVICE

CAUSE NO. 128933-CV 412th District Court

FLNG LIQUEFACTION, LLC; FLNG LIQUEFACATION 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.

PSRG, Inc.
By serving its Registered Agent
Robert J. Weber
800 West Sam Houston Parkway South, Suite 107
Houston, Texas 77042, or wherever he may be found

Came to hand on the _____ day of _____, 20___ at _____, o'clock ____.m., and executed in _____ County, Texas by delivering to each of the within named parties in person, a true copy of this CITATION with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Original Petition and Jury Demand at the following times and places, to-wit:

NAME	DATE	TIME	PLACE, COURSE, AND DISTANCE FROM COURTHOUSE	MILEAGE

and not executed as to (NAME)_____

and the cause or failure to execute this process is for the following reason: _____

_____

The diligence used in finding said (NAME) being: _____

FEES:
Serving Citation and Copy $_____ _____, Officer
Mileage: _____ miles @ $_____ per mile $_____ _____ County, Texas
Total $_____ _____
Deputy/Authorized Person

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.
In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The return must either be verified or be signed under penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is _____, my date of birth is _____, and my
(First, Middle, Last)
address is_____
(Street, City, State, Zip Code, Country)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in _____ County, State of _____, on the ____ day of _____, 20__.

_____
Declarant/Authorized Process Server

_____
(Id No. and expiration of certification)

Copy from re:SearchTX

CAUSE NUMBER: 128933-CV

FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, AND FLNG LIQUEFACTION 3, LLC
PLAINTIFF

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.
DEFENDANT

IN THE 412TH JUDICIAL DISTRICT COURT OF BRAZORIA COUNTY, TEXAS

RETURN OF SERVICE

My name is **KENNETH FAIRBANKS**. I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is: 1320 QUITMAN ST. STE 100, HOUSTON, HARRIS COUNTY, TX 77009, U.S.A.

ON **Monday June 17, 2024 AT 11:15 AM - CITATION**, **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND; EXHIBIT A-CERTIFICATE OF MERIT OF QUENTIN BAKER, P.E.** came to hand for service upon **PSRG, INC. BY SERVING ITS REGISTERED AGENT ROBERT J. WEBER**.

On **Friday June 21, 2024** at **01:39 PM -** The above named documents were hand delivered to: **PSRG, INC. BY DELIVERING TO ITS REGISTERED AGENT ROBERT J. WEBER @ 800 WEST SAM HOUSTON PARKWAY SOUTH, SUITE 107**, **HOUSTON**, **TX 77042**, **in Person.**

FURTHER AFFIANT SAYETH NOT.

STATE OF TEXAS DECLARATION

"My name is **KENNETH FAIRBANKS,** my date of birth is 01/04/1974 my business address is **1320 QUITMAN STREET, HOUSTON, TX 77009,** and I declare under penalty of perjury that this affidavit is true and correct."

Executed in **Harris County, State of Texas on Monday June 24, 2024**



PSC#22047 EXP. 03/31/25
Declarant; Appointed in accordance with State Statutes.

2024.06.892581

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efile@courtrecords.com

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