Docket #0007 Date Filed: 7/19/2024

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

ALLIANZ GLOBAL RISKS US INSURANCE CO.; CERTAIN UNDERWRITERS AT LLOYD'S OF LONDON SUBSCRIBING TO POLICY NO. B0180ME2219036; GREAT LAKES INSURANCE SE; GUIDEONE NATIONAL INSURANCE COMPANY; and TOKIO MARINE AMERICA INSURANCE COMPANY, *as subrogees of FLNG Policy Procurement, LLC; FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC*,	§	
Plaintiffs,	§	
v.	§	Adv. Pro. No. _____
ZACHRY INDUSTRIAL, INC.; ZACHRY INDUSTRIES, INC.; JVIC DEMERGER FABRICATION, INC.; ZACHRY ENTERPRISE SOLUTIONS DEMERGER, INC.; CB&I LLC; MCDERMOTT INTERNATIONAL LTD., f/k/a CB&I LLC; CHIYODA INTERNATIONAL CORPORATION; and PSRG, INC.,	§	Removed from: 239th Judicial District Court Brazoria County, Texas Cause No. 128926-CV
Defendants.	§	Related to: In re: Zachry Holdings, Inc., *et al.* Case No. 24-90377 (MI)

STATEMENT OF NON-CONSENT TO
ENTRY OF FINAL ORDERS OR JUDGMENT BY THE BANKRUPTCY COURT

Subject to and without waiving their right to seek remand to state court and contest whether this Bankruptcy Court has subject matter jurisdiction over this action, Plaintiffs Allianz Global Risks US Insurance Co., Certain Underwriters at Lloyd's of London Subscribing to Policy No. B0180ME2219036, Great Lakes Insurance SE, Guideone National Insurance Company, and Tokio Marine America Insurance Company, *as subrogees of FLNG Policy Procurement, LLC; FLNG*

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Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC (collectively, "Plaintiffs") provide the following statement in accordance with Rule 9027(e)(3) of the Federal Rules of Bankruptcy Procedure, and Rule 9027-3 of the Bankruptcy Local Rules for the Southern District of Texas:

1. Pursuant to Bankruptcy Rule 9027(e)(3) and Local Rule 9027-3, Plaintiffs do not consent to entry of final orders or judgment by the Bankruptcy Court. Plaintiffs further reserve the right to seek remand of this civil action and have made a timely and proper jury demand.

Dated: July 19, 2024

Respectfully submitted,

/s/ Ken Green

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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that on July 19, 2024, a true and correct copy of the foregoing document was served upon counsel for Defendants via the Court's CM/ECF system.

/s/ Ken Green
Ken Green