Docket #0014 Date Filed: 7/29/2024

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.	§	Case No. 3:24-cv-00208
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.,	§	
Defendants.	§	

CB&I LLC'S MOTION TO SEAL

CB&I LLC ("CB&I") files its Motion to Seal certain evidence in its 12(b)(6) Motion to Dismiss.

1. On July 29, 2024, CB&I filed its 12(b)(6) Motion to Dismiss Plaintiffs' claims.

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2. Attached to the Motion at Exhibit A is the EPC Contract between the parties. The EPC Contract contains confidential and proprietary commercial and pricing information that should not be made public.

3. The EPC Contract also contains a Confidentiality provision that arguably covers the parties' agreement.

4. For these reasons, CB&I requests that the Court seal Exhibit A to the Motion to Dismiss.

Dated: July 29, 2024

Respectfully submitted,

THE KIM LAW FIRM

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 29th day of July, 2024, a true and correct copy of the foregoing document was served electronically through the Court's ECF system on parties registered to receive electronic in the above-captioned Bankruptcy Case.

/s/ Jack W. Massey
Jack W. Massey