Docket #0017 Date Filed: 8/6/2024

UNITED STATES DISTRICT 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*,	*	**Case No. 3:24-cv-00208**
Plaintiffs,	*	
V.	*	
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.	*	

SUPPLEMENT TO THE
NOTICE OF REMOVAL FILED BY THE ZACHRY DEFENDANTS

Defendant Chiyoda International Corporation ("CIC"), pursuant to 28 U.S.C. § 1447(b), Federal Rule of Civil Procedure 81, and the Local Rules of the United States District Court for the Southern District of Texas, LR81, hereby files this notice to supplement the Removal Record. On July 5, 2024, Zachry Industrial, Inc., Zachry Industries, Inc., JVIC Demerger Fabrication, Inc., and Zachry Enterprise Solutions Demerger, Inc. filed a notice of removal with the Court and attached

the state-court pleadings and filings (ECF 1-2, the "Removal Record"). But the Removal Record did not include CIC's Original Answer that was filed in state court before the removal. Accordingly, to supplement and complete the Removal Record, CIC attaches its state-court answer as Exhibit A.

Respectfully submitted,

HAYNES AND BOONE, LLP

/s/ Brian Singleterry
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COUNSEL TO CHIYODA INTERNATIONAL CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2024, I caused a copy of the foregoing document to be served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case.

/s/ *Brian Singleterry*
Brian Singleterry

Filed for Record
7/5/2024 9:57 AM
Cassandra C. Tigner, District Clerk
Brazoria County, Texas
128926-CV
Angela Gray, Deputy

CAUSE NO. 128926-CV

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*	§	**IN THE DISTRICT COURT**
	§	**BRAZORIA COUNTY, TEXAS**
***Plaintiffs*,**	§	
V.	§	
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*.**	§	**239th JUDICIAL DISTRICT COURT**

CHIYODA INTERNATIONAL CORPORATION'S ORIGINAL ANSWER

Defendant Chiyoda International Corporation files its Original Answer in the above-styled action and respectfully show as follows:

I.
GENERAL DENIAL

In accordance with Rule 92 of the Texas Rules of Civil Procedure, Chiyoda International Corporation denies generally each and every allegation contained in Plaintiffs' Original Petition

EXHIBIT A

and demand strict proof by a preponderance of the credible evidence.

II.
PRAYER

WHEREFORE, defendant Chiyoda International Corporation respectfully requests that:

1. All claims against Chiyoda International Corporation be dismissed with prejudice;

2. Plaintiffs take nothing by reason of this action; and

3. Chiyoda International Corporation be awarded such other and further relief to which it is justly entitled.

Respectfully submitted,

/s/ Charles M. Jones II

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ATTORNEYS FOR DEFENDANT CHIYODA INTERNATIONAL CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2024, a true and correct copy of the foregoing document was served upon all parties listed below in accordance with Rule 21a of the Texas Rules of Civil Procedure:

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Paul B. Hines, ESQ.
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/s/ Brian Singleterry
Brian Singleterry

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.

Cecilia Hernandez on behalf of Charlie Jones
Bar No. 24054941
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Envelope ID: 89507069
Filing Code Description: Answer
Filing Description: Chiyoda International Corporation's Original Answer
Status as of 7/5/2024 12:22 PM CST

Case Contacts

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