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 Reply in Support of its Rule 12(b)(6) Motion to Dismiss.

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1. On September 6, 2024, CB&I filed its Reply in Support of its Motion to Dismiss Plaintiffs' claims.

2. Attached to the Reply at Exhibit 1 is Attachment A to the EPC Contract between the parties titled Scope of Work and Design Basis. The Scope of Work contains confidential and proprietary commercial information that should not be made public.

3. The EPC Contract to which the Scope of Work was attached also contains a Confidentiality provision that covers the attachment. The EPC Contract was previously filed under seal. [ECF14]

4. For these reasons, CB&I requests that the Court seal Exhibit 1 to the Reply in Support of CB&I's Rule 12(b)(6) Motion to Dismiss.

Dated: September 6, 2024

Respectfully submitted,

THE KIM LAW FIRM

/s/ John H. Kim

John H. Kim
State Bar No. 00784393
Denise H. Kim
State Bar No. 24010933
4309 Yoakum Blvd., Suite 2000
Houston, Texas 77006
Telephone: (713) 522-1177
Facsimile: (888) 809-6793
jhk@thekimlawfirm.com
denise@thekimlawfirm.com

BAKER & McKENZIE LLP

Jack W. Massey
Federal ID No. 658576
State Bar No. 24051004
Matthew C. Rawlinson
Federal ID No. 24546
State Bar No. 24013379
800 Capitol St., Suite 2100
Houston, Texas 77002
Telephone: (713) 427-5000
Facsimile: (713) 427-5099
jack.massey@bakermckenzie.com
matthew.rawlinson@bakermckenzie.com

Counsel for CB&I LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6th day of September, 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