Docket #0020 Date Filed: 9/4/2024

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	*	
	*	**Chapter 11**
ZACHRY HOLDINGS, INC., *et al.*[1]	*	
	*	**Case No. 24-90377 (MI)**
Debtors.	*	
	*	**(Jointly Administered)**
FLNG LIQUEFACTION, LLC; FLNG LIQUEFACTION 2, LLC; and FLNG LIQUEFACTION 3, LLC,	*	
	*	
***Plaintiffs*,**	*	
	*	**Adv. No. _____**
V.	*	
	*	
CB&I, INC.; ZACHRY INDUSTRIAL, INC.; and CHIYODA INTERNATIONAL CORPORATION,	*	
	*	
***Defendants*.**	*	

DEFENDANT CHIYODA INTERNATIONAL CORPORATION'S AGREED MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' ORIGINAL PETITION

Pursuant to Federal Rule of Civil Procedure 6(b) and Federal Rule of Bankruptcy Procedure 9006(b), defendant Chiyoda International Corporation ("CIC") files this Agreed Motion to Extend Time to Answer or Otherwise Respond to Plaintiffs' Original Petition, and respectfully shows as follows:

[1] The debtors in these chapter 11 cases (the "Debtors"), along with the last four digits of each Debtor's federal tax identification number, may be obtained on the website of the Debtors' claims and noticing agent at https://veritaglobal.net/zhi. The Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

1. Plaintiffs filed a Motion to Remand this action to state court in Harris County, Texas. [ECF 18.] Plaintiffs and CIC have agreed that CIC can delay filing an answer or otherwise respond to Plaintiffs' state-court petition until thirty (30) days following a ruling on Plaintiffs' Motion to Remand. Therefore, CIC seeks an extension until thirty days following the ruling in which to file its Answer or otherwise respond to Plaintiffs' Original Petition.

2. Federal Rule of Civil Procedure 6(b) states that "the court may, for good cause, extend the time . . . if a request is made, before the original time or its extension expires." FED. R. CIV. P. 6(b); FED. R. BANKR. P. 9006 (b) (containing similar language). In this case, good cause exists to extend the deadline. On August 7, 2024, CIC filed an Unopposed Motion requesting an extension to respond to Plaintiffs' Original Petition, extending the deadline to September 6, 2024. The case was subsequently referred to the U.S. Bankruptcy Court on August 28, 2024. [ECF 17.] The parties need to resolve the remand motion and other procedural issues before CIC's answer. Delaying CIC's answer date will not delay the proceedings.

3. This request is not sought for delay but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, CIC respectfully prays for thirty-day extension of time to answer or otherwise respond to Plaintiffs' Original Petition after the ruling on the Plaintiffs' motion to remand. CIC also prays for any other, further or additional relief which it may be justly entitled.

Date: September 4, 2024

Respectfully submitted,

HAYNES AND BOONE, LLP

/s/ Charles M. Jones II

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COUNSEL TO CHIYODA INTERNATIONAL CORPORATION

CERTIFICATE OF CONFERENCE

On September 2, 2024, counsel for Chiyoda International Corporation conferred regarding this motion with counsel for Plaintiffs, and Plaintiffs' counsel agreed to the requested relief.

/s/ *Brian Singleterry*
Brian Singleterry

CERTIFICATE OF SERVICE

I hereby certify that on September 4, 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

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***Plaintiffs*,**	*	
	*	**Adv. No. _____**
V.	*	
	*	
CB&I, INC.; ZACHRY INDUSTRIAL, INC.; and CHIYODA INTERNATIONAL CORPORATION,	*	
	*	
***Defendants*.**	*	

ORDER GRANTING AGREED MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' ORIGINAL PETITION

Before the Court is Defendant Chiyoda International Corporation's ("CIC") Agreed Motion to Extend Time to Answer or Otherwise Respond to Plaintiffs' Original Petition ("Motion"). After considering the Motion, the Court is of the opinion that the Motion is with merit and should be GRANTED.

[1] The debtors in these chapter 11 cases (the "Debtors"), along with the last four digits of each Debtor's federal tax identification number, may be obtained on the website of the Debtors' claims and noticing agent at https://veritaglobal.net/zhi. The Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

It is therefore ORDERED that Defendant CIC's Motion is GRANTED, and CIC's deadline to answer or otherwise respond to Plaintiffs' Original Petition is extended until thirty (30) days following a ruling on Plaintiffs' Motion to Remand.

SIGNED this ____ day of _____, 2024.

_____
Presiding Judge