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. P. No. 24-03195**
V.	§	
	§	**Ref. Adv. P. Doc. No. 90**
CB&I, INC.; ZACHRY INDUSTRIAL, INC.; and CHIYODA INTERNATIONAL CORPORATION,	§	
	§	
***Defendants*.**	§	

CHIYODA INTERNATIONAL CORPORATION'S
JOINDER TO ZACHRY INDUSTRIAL, INC.'S
MOTION FOR SUMMARY JUDGMENT ON LIMITATIONS

Defendant Chiyoda International Corporation ("CIC") files this *Joinder to Zachry Industrial Inc.'s Motion for Summary Judgment on Limitations* and respectfully shows the following.

JOINDER

1. CIC adopts and incorporates the factual background and legal arguments in *Zachry Industrial Inc.'s Motion for Summary Judgment on Limitations* [Adv. P. Doc. No. 90] in their

[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.

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entirety, including all arguments that Plaintiffs have not properly raised the discovery rule and that the discovery rule does not apply to the EPC Contracts.

CONCLUSION

2. CIC respectfully requests that the Court dismiss Plaintiffs' claim for breach of the EPC Contracts because it is barred by the four-year statute of limitations, and award CIC all further relief to which it is entitled.

[Remainder of page intentionally left blank]

Dated: February 7, 2025

Respectfully submitted,

/s/ Charles M. Jones II

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COUNSEL TO CHIYODA INTERNATIONAL CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2025, 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/ Charles M. Jones II
Charles M. Jones II