Docket #0099 Date Filed: 2/14/2025

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.	§	
	§	
CB&I, INC.; ZACHRY INDUSTRIAL, INC.; and CHIYODA INTERNATIONAL CORPORATION,	§	
	§	
***Defendants*.**	§	

DEFENDANT CB&I LLC'S JOINDER TO ZACHRY INDUSTRIAL, INC.'S MOTION FOR SUMMARY JUDGMENT ON LIMITATIONS

Defendant CB&I LLC ("CB&I") files this Joinder to Zachry Industrial Inc.'s Motion for Summary Judgment on Limitations and respectfully shows the following.

JOINDER

1. CB&I 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

[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.

their 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. CB&I 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 CB&I all further relief to which it is entitled.

[Remainder of page intentionally left blank]

Dated: February 14, 2025

Respectfully submitted,

THE KIM LAW FIRM

John H. Kim
Federal ID No. 15626
State Bar No. 00784393
Denise H. Kim
Federal ID No. 56991
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

and

BAKER & McKENZIE LLP

/s/ Jack W. Massey
Jack W. Massey
Federal ID No. 658576
State Bar No. 24051004
Matthew C. Rawlinson
Federal ID No. 24546
State Bar No. 24013379
Stephanie M. Brown
Federal ID No. 3899385
State Bar No. 24126339
800 Capitol St., Suite 2100
Houston, Texas 77002
Telephone: (713) 427-5000
Facsimile: (713) 427-5099
jack.massey@bakermckenzie.com
matthew.rawlinson@bakermckenzie.com
stephanie.brown@bakermckenzie.com

COUNSEL FOR DEFENDANT CB&I LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 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/ Jack W. Massey
Jack Massey