Docket #0101 Date Filed: 2/16/2025

**UNITED STATES BANKRUPTCY COURT**
**SOUTHERN DISTRICT OF TEXAS**
**HOUSTON DIVISION**

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|---|---|
| In re:<br><br>ZACHRY HOLDINGS, INC., *et al.*,[1]<br><br>*Debtors*. | Chapter 11<br><br>Case No. 24-90377 (MI)<br><br>(Jointly Administered) |
| FLNG LIQUEFACTION, LLC; FLNG LIQUEFACTION 2, LLC; and FLNG LIQUEFACTION 3, LLC,<br><br>*Plaintiffs,*<br><br>v.<br><br>CB&I INC.; ZACHRY INDUSTRIAL, INC.; and CHIYODA INTERNATIONAL CORPORATION,<br><br>*Defendants.* | Adv. No. 24-03195 |

**FLNG'S WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED FOR FEBRUARY 19, 2025 AT 2:30 P.M. (PREVAILING CENTRAL TIME)**

FLNG Liquefaction, LLC, FLNG Liquefaction 2, LLC, and FLNG Liquefaction 3, LLC (collectively, **"FLNG"**) file their Witness and Exhibit List for the hearing to be held in connection with *Zachry Industrial Inc.'s Motion for Summary Judgment on Limitations* [Docket No. 90] on **February 19, 2025 at 2:30 P.M.** (prevailing Central Time) (the "**Hearing**") before the Honorable Judge Marvin Isgur, United States Bankruptcy Judge, Courtroom 400, 515 Rusk Street, Houston, Texas 77002 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.



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## WITNESSES

FLNG may call any of the following witnesses at the Hearing:

1. Roberto Vara;
2. Any witness necessary to authenticate a document;
3. Any witness listed or called by any other party;
4. Rebuttal or impeachment witnesses as necessary; and
5. FLNG reserves the right to cross-examine any witness called by any other party.

## EXHIBITS

| EX. NO. | DESCRIPTION | OFFERED | OBJECTION | ADMITTED | DATE |
|---|---|---|---|---|---|
| 1 | Contractual Service Agreement between Freeport LNG Development, L.P. and GE Oil & Gas Inc. dated December 30, 2016 | | | | |
| 2 | Freeport Train 1 Liquefaction Project Final Completion Certificate | | | | |
| 3 | Freeport Train 2 Liquefaction Project Final Completion Certificate | | | | |
| 4 | Freeport Train 3 Liquefaction Project Final Completion Certificate | | | | |
| 5 | Declaration of Roberto Vara | | | | |

## RESERVATION OF RIGHTS

FLNG reserves the right to call or introduce one or more, or none, of the witnesses and/or exhibits listed above, and further reserve the right to supplement, modify, or amend this list prior to the Hearing.

Date: February 16, 2025

Respectfully Submitted,

**KING & SPALDING, LLP**

*/s/ R. Hale Neilson*
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***Counsel to FLNG Liquefaction, LLC, FLNG Liquefaction 2, LLC, and FLNG Liquefaction 3, LLC***

## CERTIFICATE OF SERVICE

I certify that on February 16, 2025, a true and correct copy of the foregoing instrument was filed with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

*/s/ R. Hale Neilson*
Hale Neilson