Docket #0102 Date Filed: 2/16/2025

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

FLNG'S AMENDED 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	Freeport Train 3 Liquefaction Project Substantial Completion Certificate				
6	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