Docket #2333 Date Filed: 02/20/2025

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

IN RE:	§	Case No. 24-90377 (MI)
	§	
ZACHRY HOLDINGS, INC., *et al.*,	§	Chapter 11
	§	
Debtors.	§	(Jointly Administered)

FLNG LIQUEFACTION, LLC, FLNG LIQUEFACTION 2, LLC, AND FLNG LIQUEFACTION 3, LLC AND THEIR SUBROGATED INSURERS' NOTICE OF OPT-OUT OF THIRD-PARTY RELEASES

FLNG Liquefaction, LLC, FLNG Liquefaction 2, LLC, FLNG Liquefaction 3, LLC, Allianz Global Risks US Insurance Co.; Certain Underwriters at Lloyd's of London Subscribing to Policy No. B0180ME2219036; Great Lakes Insurance SE; Guideone National Insurance Company; and Tokio Marine America Insurance Company, as subrogees of FLNG Policy Procurement LLC; FLNG Liquefaction, LLC; FLNG Liquefaction 2, LLC; and FLNG Liquefaction 3, LLC (collectively, "Claimants"), by and through their undersigned counsel, file this *Notice of Opt-Out of Third-Party Releases* (the "Notice") and would respectfully show the Court as follows:

1. On September 16, 2024, Claimants filed Proof of Claim Nos. 1562, 1564, and 1579 (collectively, the "Claims").

2. The Claims were disallowed by the Court's Order on (I) Motions to Dismiss the Subrogation Actions and (II) Related Claim Objection [Docket No. 1469] (the "Order").

3. The Order is currently on appeal to the United States District Court for the Southern District of Texas.

4. Claimants file this notice of opt-out of all third party-releases and exculpations that may be contained within the *Modified First Amended Joint Chapter 11 Plan of*

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Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates [Docket No. 1978] (as further, amended, supplemented or modified, the "Plan"). Claimants opt out of all third-party releases and exculpations contained within the Plan or any order confirming the Plan and do not consent to the release or exculpation of any non-debtor party.

Dated: February 20, 2025

Respectfully submitted,

/s/ Ken Green

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Attorneys for Claimants

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 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/ Ken Green
Ken Green