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

In re:

Chapter 11

NEIGHBORS LEGACY HOLDINGS, INC.,

Case No. 18-33836 (MI)

et al., 1

Jointly Administered

Debtors.

## WITNESS AND EXHIBIT LIST

The Official Committee of Unsecured Creditors (the "Committee") submits the following Witness and Exhibit List for the hearing scheduled on March 22, 2019 at 9:30 a.m. (CDT), in the above-styled, jointly administered bankruptcy cases (the "Bankruptcy Cases") before the Honorable Marvin Isgur, United States Bankruptcy Judge, Courtroom 404, 515 Rusk, Houston, Texas 77002.

#### WITNESS LIST

The Committee may call the following witnesses:

- 1. Mark Shapiro with GlassRatner.
- 2. Any witness listed, offered, or called by any other party, including the Debtors.
- 3. Any witness required for rebuttal or impeachment.

58324/0001-17056240V1

<sup>&</sup>lt;sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at www.kccllc.net/neighbors. The location of Debtors' principal place of business and the Debtors' service address is: 10800 Richmond Avenue. Houston, Texas 77042.

### **EXHIBIT LIST**

Exhibit	Description	Offered	Objection	Admitted	Disposition
No.					After Hearing
1.	Unsecured Creditor Trust Agreement				
2.	Non-Exclusive List of Retained Causes of Actions				
3.	Any exhibits listed, designated, or offered by any other party				
4.	Any exhibits necessary for rebuttal				

The Committee reserves the right to modify, amend or supplement this Exhibit and Witness List at any time. The Committee reserves the right to ask the Court to take judicial notice of pleadings, transcripts and/or documents filed in or in connection with these Bankruptcy Cases, to offer rebuttal exhibits, and to supplement or amend this Witness and Exhibit List at any time prior to the March 22, 2019 Hearing. Designation of any exhibit above does not waive any objections the Committee may have to any exhibit listed on any other party's exhibit list.

[Remainder of Page Intentionally Left Blank]

Dated: March 20, 2019 Respectfully submitted,

By: /s/ Michael D. Warner
Michael D. Warner (TX Bar No. 00792304) Cole Schotz P.C. 301 Commerce Street, Suite 1700 Ft. Worth, TX 76102

(817) 810-5250 (817) 810-5255 (fax) mwarner@coleschotz.com

Counsel for the Official Committee of **Unsecured Creditors** 

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of March, 2019, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

> /s/ Michael D. Warner Michael D. Warner