

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

In re:

NEIGHBORS LEGACY HOLDINGS, INC.,  
*et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-33836 (MI)

Jointly Administered

**WITNESS AND EXHIBIT LIST**

Mark Shapiro as Unsecured Creditor Trustee (the “Unsecured Creditor Trustee”) submits the following Witness and Exhibit List for the hearing scheduled on October 21, 2019 at 2:00 p.m. (CT), 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 Unsecured Creditor Trustee may call the following witnesses:

1. Mark Shapiro.
2. Any witness listed, offered, or called by any other party.
3. Any witness required for rebuttal or impeachment.

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<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](http://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**

<b>Exhibit No.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>	<b>Disposition After Hearing</b>
<b>1.</b>	Unsecured Creditor Trust Agreement				
<b>2.</b>	Email dated December 7, 2018 from Felice Yudkin to the Debtors regarding Neighbors Draft Plan and Disclosure Statement with attachment				
<b>3.</b>	Any exhibits listed, designated, or offered by any other party				
<b>4.</b>	Any exhibits necessary for rebuttal				

The Unsecured Creditor Trustee reserves the right to modify, amend or supplement this Exhibit and Witness List at any time. The Unsecured Creditor Trustee 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 October 21, 2019 Hearing. Designation of any exhibit above does not waive any objections the Unsecured Creditor Trustee may have to any exhibit listed on any other party's exhibit list.

*[Remainder of Page Intentionally Left Blank]*

Dated: October 15, 2019

Respectfully submitted,

By: /s/ Michael D. Warner

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*Counsel for the Unsecured Creditor Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of October, 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