

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

In Re: Limetree Bay Services, LLC, et al.,

Debtors,

Case No. 21-32351

(Jointly Administered)

Chapter 11

LIMETREE BAY REFINING, LLC,

Plaintiff,

Adv. Pro. 21-3791

v.

BEECHER COTTON, PAMELA COLON,
SIRDINA ISAAC-JOSEPH, ESTHER
CLIFFORD, SYLVIA BROWNE, ALVINA
JEAN-MARIE ILARRAZA, FRANCIS E.
CHARLES, THERESA J. CHARLES,
HELEN SHIRLEY, ANISHA HENDRICKS,
CRISTEL RODRIGUEZ, JOSIE BARNES,
ARLEEN MILLER, ROSALBA ESTEVEZ,
ISIDORE JULES, JOHN SONSON,
VIRGINIE GEORGE, CLIFFORD BOYNES,
CHRISTOPHER CHRISTIAN, MARGARET
THOMPSON, DELIA ALMESTICA, ARLOS
CHRISTIAN, ANNA
EXACHCONSTANTINE, MERVYN
CONSTANTINE, NEAL DAVIS, EDNA
SANTIAGO, GUIDRYCIA WELLS, O'SHAY
WELLS, AARON G. MAYNARD, VERNE
MCSWEEN, ROCHELLE GOMEZ, MYRNA
MATHURIN, JOAN MATHURIN, LEOBA
JOHN BAPTISTE, WARRINGTON
CHAPMAN, AND ANNE MARIE JOHN
BAPTISTE,

Defendants.

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FOR HEARING ON AUGUST 6, 2021

Defendants BEECHER COTTON, PAMELA COLON, SIRDINA ISAAC-JOSEPH, ESTHER CLIFFORD, SYLVIA BROWNE, ALVINA JEAN-MARIE ILARRAZA, (the Cotton/Colon Defendants and together with the remaining Defendants, the "Defendants") submit this Witness and Exhibit List for the hearing to be held on August 6, 2021, at 10:30 a.m. (prevailing Central Time), before Chief Judge David R. Jones.

WITNESSES

1. Michael Sales
2. Yvette Gordon
3. Marisol Rivera
4. Esther Clifford
5. Marjorie R. Berry
6. Kimlyn James
7. Pearl Mac Lorrain
8. Anthony Mac Lorrain
9. Nicholas Mulkey
10. Any rebuttal and impeachment witnesses as necessary
11. Any witness called by any other party
12. Any other witnesses present that Defendants deem necessary

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EXHIBITS

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Transcript of July 15, 2021, Omnibus Hearing, <i>Cotton v. Limetree Ventures, LLC</i> , No. 1:21-CV-00261				
2	Limetree Bay Interoffice Memorandum dated June 25, 2021				
3	Suzanne Carlson, <i>Limetree Bay CEO says troubled refinery "could have been a positive,"</i> Virgin Islands Daily News, July 21, 2021				
4	Order filed July 16, 2021, <i>Cotton v. Limetree Ventures, LLC</i> , No. 1:21-CV-00261				
5	Memorandum in Further Support of Plaintiffs' Emergency Motion for Mandatory Injunction filed July 23, 2021, <i>Cotton v. Limetree Bay Ventures, LLC</i> , No. 1:12-CV-00261				
6	Declaration of Jeffrey Charles				
7	Complaint in <i>United States of America v. Limetree Bay Refining, LLC and Limetree Bay Terminals, LLC</i> , Case No. 1:21-cv-264 (filed July 12, 2021)				
8	Photograph of oil sheen in cistern of Marjorie Berry, Exhibit to Declaration of Majorie Berry				
9	Photograph of pool of oil on property of Nicholas Mulkey, Exhibit to Declaration of Nicholas Mulkey				

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10	Video of oil on property of Nicholas Mulkey, Exhibit to Declaration of Nicholas Mulkey				
11	Photograph of Release, Exhibit to Declaration of Esther Clifford				
12	Photograph of Limetree Bay Inspectors, Exhibit to Declaration of Esther Clifford)				
13	Photograph of Template Report, Exhibit to Declaration of Esther Clifford				
14	Photograph of Template Report, Exhibit to Declaration of Pearl Mac Lorrain				
15	2 Drum Coker Example, Exhibit 1 to Declaration of Michael Sales				
16	Material Safety Data Sheet for Petroleum Coke, Exhibit 2 to Declaration of Michael Sales				
17	Material Safety Data Sheet for Residual Fuel Oil, Exhibit 3 to Declaration of Michael Sales				
18	Material Safety Data Sheet for Naptha, Exhibit 4 to Declaration of Michael Sales				
19	Material Safety Data Sheet for Intermediate Distillates, Exhibit 5 to Declaration of Michael Sales				
20	Material Safety Data Sheet for Decant Oil, Exhibit 6 to Declaration of Michael Sales				

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Any document or pleading filed in the above-captioned chapter 11 case or Adversary Proceeding				
Any exhibit listed by any other party				
Any exhibit necessary to rebut the evidence or testimony of any other witness				

Dated: August 4, 2021

RESPECTFULLY SUBMITTED,

Attorneys for Defendants Cotton, Colon,
Browne, Illaraza, Clifford, Isaac-Joseph

/s/ Joel M. Walker

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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on August 4, 2021, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to all parties in this matter, including the following:

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Attorney For: Limetree Bay Services, LLC

BY: /s/ Joel M. Walker