

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

<p><b>In re:</b></p> <p><b>NEIGHBORS LEGACY HOLDINGS, INC., <i>et al.</i>,</b></p> <p style="text-align: center;"><b>Debtors.<sup>1</sup></b></p>	§ § § § § §	<p><b>Chapter 11</b></p> <p><b>Case No. 18-33836 (MI)</b></p> <p><b>(Jointly Administered)</b></p>
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**DEBTORS’ EXHIBIT AND WITNESS LIST FOR “FIRST DAY” HEARING**

The above-referenced debtors file this Exhibit and Witness List for the hearing to be held on July 13, 2018, at 10:30 a.m. in Courtroom 404 of the United States Courthouse, 515 Rusk Street, Houston, Texas 77002.

**EXHIBITS**

NO.	Description	M	O	O	A	W/D	Disposition After Trial
		a	f	b	d		
		r	e	j	m		
		k	r	e	i		
				c	t		
1.	Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First Day Pleadings, including Ex. A – Organizational Chart						

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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.

NO.	Description	M a r k	O f f e r	O b j e c t	A d m i t	W/D	Disposition After Trial
2.	Credit Agreement (Credit Agreement dated as of November 19, 2015; Amendment No. 1 to Credit Agreement dated as of July 5, 2016; Waiver, Consent, and Amendment No. 2 to Credit Agreement dated as of September 9, 2016; Waiver, Consent, and Amendment No. 3 to Credit Agreement dated as of May 9, 2017)						
3.	Pledge and Security Agreement (Pledge and Security Agreement dated as of November 19, 2015; Amended and Restated Pledge and Security Agreement dated as of May 9, 2017)						
4.	Assignment of Management Services Agreement dated November 19, 2015						
5.	Collateral Assignment of Trademarks dated as of November 19, 2015						
6.	Deed of Trust, Assignment of Leases and Rents, Security Agreement and UCC Financing Statement for Fixture Filing dated effective as of November 19, 2015, by NEC Baytown Asset Holdings, LLC, as Grantor, to Martha Wach, as Trustee, for the benefit of the Agent, as Beneficiary						
7.	Deed of Trust, Assignment of Leases and Rents, Security Agreement and UCC Financing Statement for Fixture Filing dated effective as of November 19, 2015, by NEC Beaumont Asset Holdings, LLC, as Grantor, to Martha Wach, as Trustee, for the benefit of the Agent, as Beneficiary						

NO.	Description	M a r k	O f f e r	O b j e c t	A d m i t	W/D	Disposition After Trial
8.	Deed of Trust, Assignment of Leases and Rents, Security Agreement and UCC Financing Statement for Fixture Filing dated effective as of November 19, 2015, by NEC Kingwood Asset Holdings, LLC, as Grantor, to Martha Wach, as Trustee, for the benefit of the Agent, as Beneficiary						
9.	Deed of Trust, Assignment of Leases and Rents, Security Agreement and UCC Financing Statement for Fixture Filing dated effective as of November 19, 2015, by NEC Pearland Asset Holdings, LLC, as Grantor, to Martha Wach, as Trustee, for the benefit of the Agent, as Beneficiary						
10.	List of Debtors' Bank Accounts						
11.	Summary of Cash Management System						
12.	List of Utility Companies						
13.	Claims Agent Declaration						
14.	Claims Agent Agreement						
15.	Cash Collateral Budget						
16.	Master Staffing Services Agreement						
17.	Any pleadings, reports, exhibits, transcripts, proposed orders, Court orders, or other documents filed in the above-captioned bankruptcy case						
18.	Any exhibit introduced by any other party						

NO.	Description	M a r k	O f f e r	O b j e c t	A d m i t	W/D	Disposition After Trial
19.	Rebuttal or impeachment exhibits as necessary						

*[Remainder of page intentionally left blank]*

**WITNESSES**

The Debtors may call the following witnesses at the Hearing:

1. Chad J. Shandler, proposed Chief Restructuring Officer
2. Tensie Axton, Chief Financial Officer
3. Kevin J. DeLuise, CohnReznick LLP
4. Rebuttal witnesses as necessary.
5. Any witness listed by any other party.

The Debtors reserve their right to amend or supplement this Exhibit and Witness List as necessary in advance of the Hearing.

Dated: Houston, Texas  
July 12, 2018

**PORTER HEDGES LLP**

By: /s/ John F. Higgins  
John F. Higgins  
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Eric M. English  
State Bar No. 24062714  
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**PROPOSED COUNSEL FOR DEBTORS  
AND DEBTORS IN POSSESSION**

**CERTIFICATE OF SERVICE**

I certify that on July 12, 2018, I caused a copy of the foregoing document to be served by the Electronic Case Filing System in the United States Bankruptcy Court for the Southern District of Texas.

*/s/ John F. Higgins*

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John F. Higgins