

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

)	Chapter 11
In re:)	
)	Case No. 23-11069 (CTG)
YELLOW CORPORATION, <i>et al.</i> , ¹)	
)	(Jointly Administered)
Debtors.)	
)	

**FINLAYSON LOGISTICS ASSETS, LLC’S WITNESS AND EXHIBIT LIST
FOR HEARING ON APRIL 18, 2024 AT 12:00 P.M. (ET)**

Finlayson Logistics Assets, LLC (“Finlayson”) hereby provides the following information regarding the witnesses it may present, and the list of the potential exhibits that it may seek to introduce, at the hearing scheduled for April 18, 2024 at 12:00 p.m. (ET) (the “Hearing”) on:

1. the *Debtors’ Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Certain Unexpired Leases and (II) Granting Related Relief* (the “Motion”) [D.I. 2157]; and
2. the *Objection of Finlayson Logistics Assets, LLC to Debtors’ Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Certain Unexpired Leases and (II) Granting Related Relief* (the “Finlayson Objection”) [D.I. 2243].

WITNESS

Information on Witness

1. Name and title of witness: Brian Roach, Vice President of Asset Management and Portfolio Management, Mapletree US Management Inc.

¹ A complete list of each of the “Debtors” in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

2. Scope of testimony: In support of the Finlayson Objection and in opposition to the Motion and the expected testimony of the witnesses of the Debtors.
3. Direct testimony of witness: Mr. Roach will be present in the Courtroom to testify live.
4. Location and place from which the witness will testify: Mr. Roach will be available to testify in person.

Finlayson reserves the right to call any witness designated by the Debtors and/or any other party-in-interest.

EXHIBITS

Finlayson designates the following exhibits that may be used at the Hearing in connection with the matters listed above:

Exhibit No.	Document Description	Docket No.
1	Lease Agreement (Single-Tenant Property) Finlayson 000123-000147	
2	Memorandum of Lease Finlayson 000148-000150	
3	Finlayson Lease Ledgers Finlayson 000151, 000152	
4	Maricopa County Consolidated 2023 Tax Statement Finlayson 000098-000099	
5	RTA Observations Phoenix Portfolio Finlayson 000102-000119	
6	Phase I Environmental Site Assessment Finlayson 000935-002254	
7	Photos of Phoenix Property Finlayson 000040-000091	
8	Houston Lease Documents Finlayson 000282-000317	
9	Houston Tenant Improvement List Finlayson 000347	
10	Notice of Modified Schedule to the XPO Asset Purchase Agreement	1298
11	Notice of (A) Winning Bidder for Certain of the Debtors' Leased Properties, (B) Filing of Asset Purchase Agreement and Proposed Sale Order With Respect to the Proposed Transaction; and (C) Scheduling of Sale Hearing, Objection Deadline, and Adequate Assurance Objection Deadline With Respect to the Proposed Transaction	2158
12	Indication of Interest Yellow Assumption 00018099-0018110	
13	Attorney Fee Statements for Munsch Hardt Kopf & Harr, PC and Montgomery McCracken Walker & Rhoads LLP Finlayson 002264-002320	

RESERVATION OF RIGHTS

Finlayson reserves all rights to: (i) amend and supplement this witness and exhibit list at any time prior to the Hearing; (ii) use additional exhibits for purposes of rebuttal or impeachment and to supplement the foregoing exhibit list as appropriate; (iii) rely upon and use as evidence (a) any exhibits included on the exhibit lists of the Debtors and/or any other party-in-interest and (b) any pleading, hearing transcript, order, or other document filed with the Court in these chapter 11 cases; (iv) cross examine any and all witnesses proffered at the Hearing; and (v) call any rebuttal witnesses as Finlayson may deem necessary at the Hearing.

Dated: April 16, 2024

**MONTGOMERY McCracken Walker &
Rhoads LLP**

/s/ Gregory T. Donilon _____

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-and-

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