

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

In re:

MINING PROJECT WIND DOWN  
HOLDINGS, INC. (f/k/a Compute North  
Holdings, Inc.), *et al.*,

Reorganized Debtors.<sup>1</sup>

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

**THE PLAN ADMINISTRATOR AND LITIGATION TRUSTEE’S  
WITNESS AND EXHIBIT LIST FOR HEARING ON JANUARY 10, 2025**

Tribolet Advisors LLC, in its capacity as plan administrator and litigation trustee (the “Plan Administrator”), respectfully submits this witness and exhibit list (the “List”) for the hearing scheduled for January 10, 2025, at 9:00 a.m. (prevailing Central Time) (the “Hearing”).

<sup>1</sup>

On September 28, 2023, the Court entered the *Final Decree Closing Certain Cases and Amending Caption of Remaining Cases* [ECF No. 1287], closing the chapter 11 cases of the following sixteen entities: Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The chapter 11 cases of the remaining three Reorganized Debtors: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); and Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551), shall remain open and jointly administered under the above caption. The Reorganized Debtors’ service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

**WITNESS LIST**

The Plan Administrator may call all of the following witnesses at the Hearing:

1. Any witnesses called or designated by Relm Insurance Ltd. and Banyan Risk Ltd (collectively, the “Insurers”) or by any other party; and
2. Any witness necessary to rebut testimony of a witness called or designated by the Insurers or by any other party.

**EXHIBIT LIST**

The Committee may use any of the following exhibits at the Hearing:

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
1.	Any exhibit designated or used by the Insurers or any other party				
2.	Any exhibit necessary to rebut the evidence or testimony of any witness called or designated by the Insurers or any other party				

The Plan Administrator reserves the right to amend or supplement this List at any time prior to or during the Hearing.

Dated: January 9, 2025

Respectfully submitted,

/s/ Charles R. Gibbs

Charles R. Gibbs

Texas State Bar No. 7846300

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- and -

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Stacy A. Lutkus (admitted *pro hac vice*)

Jessica Greer Griffith (admitted *pro hac vice*)

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*Counsel to the Mining Project Wind Down  
Holdings, Inc. Litigation Trust and the Plan  
Administrator*

**CERTIFICATE OF SERVICE**

I certify that on January 9, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Gibbs

Charles R. Gibbs