

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

<hr/>)
In re:)	Chapter 11
ZACHRY HOLDINGS, INC., <i>et al.</i>)	Case No. 24-90377 (MI)
Debtor.)	(Emergency Hearing Requested)
Tax I.D. No. 26-1256814)	
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In re:)	Chapter 11
ZACHRY EPC HOLDINGS, INC., <i>et al.</i>)	Case No. 24-90378 (MI)
Debtor.)	(Emergency Hearing Requested)
Tax I.D. No. 20-2340077)	
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In re:)	Chapter 11
ZACHRY ENGINEERING CORPORATION)	Case No. 24-90379 (MI)
Debtor.)	(Emergency Hearing Requested)
Tax I.D. No. 20-3603134)	
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In re:)	Chapter 11
ZACHRY HIGH VOLTAGE SOLUTIONS, LLC)	Case No. 24-90381 (MI)
Debtor.)	(Emergency Hearing Requested)
Tax I.D. No. 20-5791090)	
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In re:)	Chapter 11
ZEC NEW YORK, INC.)	Case No. 24-90380 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 31-0825897)	
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In re:)	Chapter 11



UE PROPERTIES, INC.

Debtors.

Tax I.D. No. 75-2052226

In re:

ZEC MICHIGAN, INC.

Debtors.

Tax I.D. No. 20-0404627

In re:

ZACHRY INDUSTRIAL, INC.

Debtors.

Tax I.D. No. 74-2887583

In re:

ZACHRY CONSTRUCTORS, LLC

Debtors.

Tax I.D. No. 85-3449094

In re:

MOSS POINT PROPERTIES, LLC

Debtors.

Tax I.D. No. 46-0851616

In re:

ZACHRY ENTERPRISE SOLUTIONS, LLC

Debtors.

Tax I.D. No. 85-3532706

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) Case No. 24-90382 (MI)
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) (Emergency Hearing Requested)
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) Chapter 11
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) Case No. 24-90383 (MI)
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) (Emergency Hearing Requested)
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) Chapter 11
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) Case No. 24-90385 (MI)
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) (Emergency Hearing Requested)
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) Chapter 11
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) Case No. 24-90384 (MI)
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) Chapter 11
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) Case No. 24-90387 (MI)
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) (Emergency Hearing Requested)
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) Chapter 11
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) Case No. 24-90386 (MI)
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) (Emergency Hearing Requested)
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In re:)	Chapter 11
ZACHRY NUCLEAR, INC.)	Case No. 24-90389 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 26-3117807)	
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In re:)	Chapter 11
ZACHRY NUCLEAR CONSTRUCTION, INC.)	Case No. 24-90388 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 26-3383241)	
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In re:)	Chapter 11
ZACHRY NUCLEAR ENGINEERING, INC.)	Case No. 24-90390 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 06-1067568)	
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In re:)	Chapter 11
COMPUTER SIMULATION &N ANALYSIS, INC.)	Case No. 24-90391 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 82-0424097)	
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In re:)	Chapter 11
ZACHRY PLANT SERVICES HOLDINGS, INC.)	Case No. 24-90392 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 46-0901383)	
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In re:)	Chapter 11
JVIC FABRICATION, LLC)	Case No. 24-90393 (MI)

Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 85-3659726)	
In re:)	Chapter 11
ZACHRY INDUSTRIAL AMERICAS, INC.)	Case No. 24-90394 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 27-1310902)	
In re:)	Chapter 11
ZACHRY MAINTENANCE SERVICES, LLC)	Case No. 24-90395 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 85-3519005)	
In re:)	Chapter 11
J.V. INDUSTRIAL COMPANIES, LLC)	Case No. 24-90396 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 76-0660821)	
In re:)	Chapter 11
MADISON INDUSTRIAL SERVICES TEAM, LLC)	Case No. 24-90397 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 20-0696261)	

**DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN
ORDER (I) DIRECTING JOINT ADMINISTRATION OF CASES
AND (II) WAIVING REQUIREMENTS OF BANKRUPTCY CODE
SECTION 345(c)(1) AND BANKRUPTCY RULES 1005 AND 2002(N)**

Emergency relief has been requested. Relief is requested not later than 4:15 p.m. (prevailing Central Time) on May 21, 2024.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

A hearing will be conducted on this matter on May 21, 2024 at 4:15 p.m. (prevailing Central Time) in Courtroom 404, 4th floor, 515 Rusk, Houston, Texas 77002. Participation at the hearing will only be permitted by an audio and video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Isgur's conference room number is 954554. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Isgur's home page. The meeting code is "JudgeIsgur." Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the "electronic appearance" link on Judge Isgur's home page. Select the case name, complete the required fields and click "submit" to complete your appearance.

The above-captioned debtors and debtors in possession (collectively, the "**Debtors**," and together with their non-Debtor affiliates, the "**Company**") state as follows in support of this motion (this "**Motion**"):

RELIEF REQUESTED

1. The Debtors seek entry of an order, substantially in the form attached hereto (respectively, the "**Final Order**"), (a) directing procedural consolidation and joint administration of these chapter 11 cases and (b) waiving the requirements of section 342(c)(1) of title 11 of the United States Code (the "**Bankruptcy Code**") and rule 2002(n) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") that the case caption and other notices mailed in these chapter 11 cases contain the tax identification number and address for each Debtor. As an

alternative to including each Debtor’s address and tax identification number in the caption, the Debtors propose adding a footnote listing all of the Debtors and the last four digits of their tax identification numbers. Specifically, the Debtors request that the Clerk of the United States Bankruptcy Court for the Southern District of Texas maintain one file and one docket for all of the jointly administered cases under the case of Zachry Holdings, Inc., and that the cases be administered under a consolidated caption, as follows:

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

)	
In re:)	Chapter 11
Zachry Holdings, Inc., <i>et al.</i> ¹)	Case No. 24-90377 (MI)
Debtors.)	(Jointly Administered)
)	

2. The Debtors further request that a docket entry, substantially similar to the following, be entered on the docket of each of the Debtors to reflect the joint administration of these chapter 11 cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Bankruptcy Local Rules directing joint administration of the chapter 11 cases of: Zachry Holdings, Inc., Case No. 24-90377; Zachry EPC Holdings, LLC, Case No. 24-90378; Zachry Engineering Corporation Case No. 24-90379; Zachry High Voltage Solutions, LLC Case No. 24-90381; ZEC New York, Inc. Case No. 24-90380; UE Properties, Inc. Case No. 24-90382; ZEC Michigan, Inc. Case No. 24-90383; Zachry Industrial, Inc. Case No. 24-90385; Zachry Constructors, LLC Case No. 24-90384; Moss Point Properties, LLC Case No. 24-90387; Zachry Enterprise Solutions, LLC Case No. 24-90386; Zachry Nuclear, Inc. Case No. 24-90389; Zachry Nuclear Construction, Inc. Case No. 24-90388; Zachry Nuclear Engineering, Inc. Case No. 24-90390; Computer Simulation & Analysis, Inc. Case No. 24-90391; Zachry Plant

¹ The last four digits of Zachry Holdings, Inc.’s tax identification number are 6814. A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/zhi. The location of the Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

Services Holdings, Inc. Case No. 24-90392; JVIC Fabrication, LLC Case No. 24-90393; Zachry Industrial Americas, Inc. Case No. 24-90394; Zachry Maintenance Services, LLC Case No. 24-90395; J.V. Industrial Companies, LLC Case No. 24-90396; Madison Industrial Services Team, LLC Case No. 24-90397. All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 24-90377 (MI).

3. In support of this Motion, the Debtors rely upon and incorporate by reference the *Declaration of Mohsin Y. Meghji in Support of Chapter 11 Petitions and Requests for First Day Relief* (the “**First Day Declaration**”),¹ filed contemporaneously herewith.

Jurisdiction, Venue, and Predicates for Relief

4. The United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding under 28 U.S.C. § 157(b). The Debtors confirm their consent to the entry of a final order by the Court. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The predicates for the relief requested herein are sections 105(a) of the Bankruptcy Code, Bankruptcy Rules 1015(b) and 6003 of the Bankruptcy Procedure, and rules 1015.1 and 9013.1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”).

Background

6. On May 21, 2024 (the “**Petition Date**”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the Court. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors are requesting procedural consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b). No request for the

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

appointment of a trustee or examiner has been made in these chapter 11 cases, and no official committees have been appointed or designated.

7. The Company is a leading provider of turnkey engineering, construction, maintenance, turnaround, and fabrication services. Headquartered in San Antonio, Texas, the Company has approximately 20,000 employees and has worked on some of the largest industrial projects in the United States. The Company was founded 100 years ago, in 1924, by H.B. Zachry. His first construction project was a series of four concrete-reinforced bridges in Laredo, Texas, which he built using mule-drawn wagons. Throughout the twentieth century, the Company completed high profile projects across the United States and the rest of the world, including the dredging of the Colorado River in Austin, Texas to increase the river's depth and width, the engineering and construction of the Hilton Palacio del Rio Hotel in San Antonio, and on the other side of the globe, the completion of the U.S. Embassy in Moscow in the wake of the Cold War. In 1998, a third generation of Zachrys—brothers David Zachry and John Zachry—took over the business. A decade later, in 2008, the brothers split the business into two independent and separately run organizations: (1) Zachry Group, led by John Zachry and comprised of entities that include the Debtors in these chapter 11 cases, which focuses on industrial projects, and (2) Zachry Construction Corporation, led by David Zachry, which focuses on heavy civil and building construction work. The two organizations have operated independently since. No entities related to Zachry Construction Corporation's business are included in these chapter 11 cases.

8. Today, Zachry Group, including the Debtors in these chapter 11 cases, is known for providing top-notch engineering and construction services to clients in the energy, chemicals, power, manufacturing, and industrial sectors across North America, all with an attention to detail and client service that customers have learned comes standard with the Zachry name. The

Company had approximately \$5.4 billion in operating revenues in 2023. Debtor Zachry Industrial, Inc. (“ZII”) is currently engaged in the construction of 5 major projects with an aggregate contract value of approximately \$25.1 billion, approximately \$13.8 billion of which constitutes ZII’s share of the contract value (as opposed to its joint venture partners). In addition, the Debtors are engaged in over 700 hundred smaller maintenance, warranty, or site-support projects.

9. Additional factual background and information regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the commencement of these chapter 11 cases, is set forth in detail in the First Day Declaration.

Basis for Relief

10. Bankruptcy Rule 1015(b) provides, in pertinent part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” FED. R. BANKR. P. 1015(b). The Debtors in these cases are “affiliates” of each other as the term is defined in 11 U.S.C. § 101(2)² and as used in Bankruptcy Rule 1015(b).

11. Joint administration of these chapter 11 cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many of the motions, hearings, and orders in these chapter 11 cases will affect each Debtor entity. The entry of an order directing joint administration of these chapter 11 cases will reduce fees and costs by avoiding duplicative filings and objections. Joint administration also will allow the United States Trustee and all parties in interest to monitor these chapter 11 cases with greater ease and efficiency.

² In particular, affiliate is defined in the Bankruptcy Code as, among other things, a “corporation 20 percent or more of whose outstanding voting securities are directly or indirectly owned, controlled, or held with power to vote, by the debtor, or by an entity that directly or indirectly owns, controls, or holds the power to vote, 20 percent or more of the outstanding voting securities of the debtor. . . .” 11 U.S.C. § 101(2)(B).

12. Joint administration will not adversely affect the Debtors' respective constituencies because this Motion seeks only administrative, not substantive, consolidation of the Debtors' estates. Parties in interest will not be harmed by the relief requested, but instead will benefit from the cost reductions associated with the joint administration of these chapter 11 cases. The joint administration of these chapter 11 cases is in the best interests of the Debtors' estates, their creditors, and all other parties in interest.

13. The use of the simplified case caption, without reference to the Debtors' respective tax identification numbers and other detail specified by section 342(c) of the Bankruptcy Code and Bankruptcy Rule 2002(n), will eliminate cumbersome and confusing procedures and ensure a uniformity of pleading identification. The name of the lead Debtor and the last four digits of its tax identification number will be set forth in the footnote to the caption. The footnote to the caption will also include a link to a webpage maintained by the Debtors' proposed claims and noticing agent, where the names of the other Debtors and their tax identification numbers will be readily available.³ Further, such case-specific information will be listed in the petitions for each Debtor, which are publicly available or will be provided by the Debtors upon request; and this information will be included in key notices to parties in interest, such as the notices required under Bankruptcy Rules 2002(a)(1), 2002(a)(7), and 2002(b), as made applicable to these chapter 11 cases. Therefore, the policies behind the requirements of Bankruptcy Code section 342(c) and Bankruptcy Rules 1005, 1015, and 2002(n) have been satisfied.

³ Given the large number of Debtors in these chapter 11 cases (twenty-one, in total), the Debtors submit that their proposed footnote to the caption is appropriate to streamline pleadings.

Emergency Consideration

14. Bankruptcy Rule 6003 empowers a court to grant relief within the first twenty-one days after the Petition Date “to the extent that relief is necessary to avoid immediate and irreparable harm.” Failure to receive the relief requested in this Motion during the first 21 days of these chapter 11 cases would severely disrupt the Debtors’ operations at this critical juncture. The Debtors have satisfied the “immediate and irreparable” harm standard in Bankruptcy Rule 6003 and request that the Court approve the relief requested on an emergency basis.

Notice

15. The Debtors will provide notice of this Motion to: (a) the United States Trustee for the Southern District of Texas; (b) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (c) the United States Attorney’s Office for the Southern District of Texas; (d) the state attorneys general for the states in which the Debtors operate; (e) the Internal Revenue Service; (f) the United States Securities and Exchange Commission; (g) counsel to the Prepetition Agent, and (h) any party that has requested notice pursuant to Bankruptcy Rule 2002 and Bankruptcy Local Rule 9013-1(d). In light of the nature of the relief requested, no other or further notice need be provided.

The Debtors request that the Court enter the Order granting the relief requested in this Motion and such other and further relief as the Court deems appropriate under the circumstances.

Dated: May 21, 2024
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP

Charles R. Koster (Texas Bar No. 24128278)
609 Main Street, Suite 2900
Houston, Texas 77002
Telephone: (713) 496-9700
Facsimile: (713) 496-9701
Email: charles.koster@whitecase.com

Bojan Guzina (*pro hac vice* pending)
Andrew F. O'Neill (*pro hac vice* pending)
RJ Szuba (*pro hac vice* pending)
Barrett Lingle (*pro hac vice* pending)
111 South Wacker Drive, Suite 5100
Chicago, Illinois 60606
Telephone: (312) 881-5400
Email: bojan.guzina@whitecase.com
aoneill@whitecase.com
rj.szuba@whitecase.com
barrett.lingle@whitecase.com

*Proposed Counsel to the Debtors and
Debtors in Possession*

Certificate of Accuracy

I certify that the foregoing statements are true and accurate to the best of my knowledge. This statement is being made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/ Charles R. Koster

Charles R. Koster

Certificate of Service

I certify that on May 21, 2024, 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. Koster

Charles R. Koster

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

In re:) Chapter 11
ZACHRY HOLDINGS, INC., *et al.*) Case No. 24-90377 (MI)
Debtor.) (Emergency Hearing Requested)
Tax I.D. No. 26-1256814)

In re:) Chapter 11
ZACHRY EPC HOLDINGS, INC., *et al.*) Case No. 24-90378 (MI)
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Debtors.

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In re:)	Chapter 11
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In re:)	Chapter 11
J.V. INDUSTRIAL COMPANIES, LLC)	Case No. 24-90396 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 76-0660821)	
In re:)	Chapter 11
MADISON INDUSTRIAL SERVICES TEAM, LLC)	Case No. 24-90397 (MI)
Debtors.)	(Emergency Hearing Requested)
Tax I.D. No. 20-0696261)	

ORDER (I) DIRECTING JOINT ADMINISTRATION OF CASES AND (II) WAIVING REQUIREMENTS OF BANKRUPTCY CODE SECTION 345(C)(1) AND BANKRUPTCY RULES 1005 AND 2002(N)

Upon the motion (the “**Motion**”)¹ of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”), (a) directing procedural consolidation and joint administration of these chapter 11 cases and (b) waiving the requirements of section 342(c)(1) of title 11 of the United States Code (the “**Bankruptcy Code**”) and rule 2002(n) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) that the case caption and other notices mailed in these chapter 11 cases contain tax identification number and address for each Debtor, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and due, sufficient, and proper notice of the Motion having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Bankruptcy Local Rules, and it appearing that no other or further notice need be provided; and a hearing having been held to consider the relief requested in the Motion (the “**Hearing**”); and upon consideration of the First Day Declaration and the record of the Hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, their creditors, their stakeholders, and all other parties in interest, and that the legal and factual bases set forth in the Motion and at the Hearing establish

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The above-captioned chapter 11 cases are consolidated for procedural purposes only and shall be jointly administered by this Court under lead case: Zachry Holdings, Inc., Case No. 24-90377 (MI). Additionally, the following checked items are ordered:

- 1. **One disclosure statement and plan of reorganization may be filed for all of the cases by any plan proponent.**
- 2. **Parties may request joint hearings on matters pending in any of the jointly administered cases.**
- 3. **Other: See below**

2. The requirements under section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n) that the case caption and other notices mailed in these cases include the Debtors' tax identification numbers and other identifying information about the Debtors are waived. The Debtors shall include in all pleadings filed and each notice mailed by the Debtors a footnote listing the lead Debtor and the last four digits of its tax identification numbers, as well as a link to a webpage maintained by the Debtors' proposed claims and noticing agent, where the names of the other Debtors and their tax identification numbers will be readily available.

3. The caption of the lead case should read as follows:

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

In re:)	
)	Chapter 11
Zachry Holdings, Inc., <i>et al.</i> ¹)	Case No. 24-90377 (MI)

¹ The last four digits of Zachry Holdings, Inc.'s tax identification number are 6814. A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be

Debtors.)
) (Jointly Administered)
)

4. A docket entry, substantially similar to the following, shall be entered on the dockets of each of the Debtors, and any related Debtor affiliates that subsequently commence chapter 11 cases, other than Zachry Holdings, Inc., to reflect the joint administration of these chapter 11 cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Bankruptcy Local Rules directing joint administration of the chapter 11 cases of: Zachry Holdings, Inc., Case No. 24-90377; Zachry EPC Holdings, LLC, Case No. 24-90378; Zachry Engineering Corporation Case No. 24-90379; Zachry High Voltage Solutions, LLC Case No. 24-90381; ZEC New York, Inc. Case No. 24-90380; UE Properties, Inc. Case No. 24-90382; ZEC Michigan, Inc. Case No. 24-90383; Zachry Industrial, Inc. Case No. 24-90385; Zachry Constructors, LLC Case No. 24-90384; Moss Point Properties, LLC Case No. 24-90387; Zachry Enterprise Solutions, LLC Case No. 24-90386; Zachry Nuclear, Inc. Case No. 24-90389; Zachry Nuclear Construction, Inc. Case No. 24-90388; Zachry Nuclear Engineering, Inc. Case No. 24-90390; Computer Simulation & Analysis, Inc. Case No. 24-90391; Zachry Plant Services Holdings, Inc. Case No. 24-90392; JVIC Fabrication, LLC Case No. 24-90393; Zachry Industrial Americas, Inc. Case No. 24-90394; Zachry Maintenance Services, LLC Case No. 24-90395; J.V. Industrial Companies, LLC Case No. 24-90396; Madison Industrial Services Team, LLC Case No. 24-90397. All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 24-90377 (MI):

5. The Debtors shall maintain, and the Clerk of the United States Bankruptcy Court for the Southern District of Texas shall keep, one consolidated docket, one file, and one consolidated service list for these chapter 11 cases.

6. Any party in interest may request joint hearings on matters pending in any of these chapter 11 cases.

7. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these chapter 11 cases and this Order

obtained on the website of the Debtors' proposed claims and noticing agent at www.kccllc.net/zhi. The location of the Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases.

8. The requirements set forth in Bankruptcy Local Rule 9013-1(b) are satisfied by the contents of the Motion.

9. This Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Houston, Texas

Dated: _____, 2024

UNITED STATES BANKRUPTCY JUDGE