

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.)	(Joint Administration Requested)
_____)	(Emergency Hearing Requested)

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASES

On May 21, 2024 (the “**Petition Date**”), the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed voluntary petitions for relief under title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Southern District of Texas. The undersigned proposed counsel believes that these chapter 11 cases qualify as complex chapter 11 cases because:

- X The Debtors have total debt of more than \$10 million;
- X There are more than 50 parties-in-interest in these cases;
- Claims against the Debtors are publicly traded;
- Other (Substantial explanation is required).

The Debtors respectfully request entry of an order designating the above-captioned chapter 11 cases as complex cases and granting 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

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.



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*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 via 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., <i>et al.</i> ¹)	
)	Case No. 24-90377 (MI)
Debtors.)	(Jointly Administered)
)	Re: Docket No. ____

ORDER GRANTING COMPLEX CHAPTER 11 BANKRUPTCY CASES TREATMENT

On May 21, 2024, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed these jointly administered chapter 11 cases and the *Notice of Designation of Complex Chapter 11 Cases* (the “**Notice**”). Based on its review of the initial pleadings, the Court concludes that the complex chapter 11 case designation is appropriate. Accordingly, the Court hereby orders:

1. The Procedures for Complex Chapter 11 Cases in the Southern District of Texas apply to these chapter 11 cases. The procedures are posted on the Court’s website. Compliance with the procedures is required.
2. The Debtors must give notice of this Order to all parties in interest within seven (7) days. If a party in interest objects to the provisions of this Order, that party may file an appropriate motion within fourteen (14) days after service of the Order.
3. The Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Local Rules**”) apply to these chapter 11 cases, subject to the following modifications:
 - a. Bankruptcy Local Rule 1001-1(b) does not apply.
 - b. Rule 83.1 of the Local Rules of the United States District Court of the Southern District of Texas (the “**Local District Court Civil Rules**”) applies.
 - c. Appendix A to the Local District Court Civil Rules applies.
 - d. If a conflict exists between the Bankruptcy Local Rules and the Procedures for Complex Chapter 11 Cases in the Southern District of Texas, the

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Procedures for Complex Chapter 11 Cases in the Southern District of Texas govern.

Dated: _____, 2024
Houston, Texas

UNITED STATES BANKRUPTCY JUDGE