

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))		

**DEBTORS’ EMERGENCY MOTION FOR ENTRY OF AN ORDER
(I) AUTHORIZING THE DEBTORS TO REDACT CERTAIN PERSONALLY
IDENTIFIABLE INFORMATION, (II) APPROVING THE FORM AND MANNER
OF THE NOTICE OF COMMENCEMENT, AND (III) GRANTING RELATED RELIEF**

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.

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 <https://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.



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 (the “**Order**”), (a) authorizing the Debtors to redact certain personally identifiable information, (b) approving the form and manner of notice of commencement of these chapter 11 cases, and (c) granting related relief.

2. In support of this Motion, the Debtors rely upon and incorporate by reference the *Declaration of Mohsin Y. Meghji in Support of the Debtors’ Chapter 11 Petitions and First Day Relief* (the “**First Day Declaration**”),² filed contemporaneously herewith.

Jurisdiction, Venue, and Predicates for Relief

3. 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.

4. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The predicates for the relief requested herein are section 107(c) of title 11 of the United States Code (the “**Bankruptcy Code**”), rules 1007, 2002, and 6003 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), rules 9013-1 and 9037-1(b) of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”), and

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

the Procedures for Complex Cases in the Southern District of Texas (the “**Complex Case Procedures**”).

Background

I. Overview of Chapter 11 Cases

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 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

I. Redaction of Certain Confidential Information of Individuals Is Warranted

10. Bankruptcy Local Rule 9037-1(b) acknowledges that “[c]ertain documents are routinely redacted to remove personal identifying information or other content that is not relevant to a decision by the Court,” and, “[i]n those instances,” provides that “(i) the document may be filed in redacted form only; (ii) no document should be filed that contains the redacted information; and (iii) the balance of this Rule 5003-1 [sic] does not apply.” As a result, the Debtors believe that they already have the authority to redact personal identifying information from documents filed

with the Court in these chapter 11 cases. Nevertheless, the Debtors are requesting authority to redact personal identifying information from any document filed or to be filed with the Court in these chapter 11 cases, so as to protect individuals and to prevent the Debtors from potentially violating applicable data privacy and protection laws or regulations.

11. Section 107(c) of the Bankruptcy Code provides that the Court:

for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property:

- (A) Any means of identification . . . contained in a paper filed, or to be filed, in a case under the [Bankruptcy Code].
- (B) Other information contained in a paper described in subparagraph (A).

11 U.S.C. § 107(c)(1).

12. Title 18 of the United States Code defines “means of identification” as:

any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, *including any—*

- (A) name, social security number, date of birth, official State or government issued driver's license or identification number, alien registration number, government passport number, employer or taxpayer identification number.

18 U.S.C. § 1028(d)(7) (emphasis added).

13. While transparency is important to the judicial process, Congress recognized a counterbalancing interest in enacting section 107(c)(1) of the Bankruptcy Code: the need to protect the identities and privacy of individuals who have dealings with debtors. The language of both statutes cited above demonstrates Congress's desire for courts to have flexibility to protect individuals' identities. Section 107(c)(1)(B) of the Bankruptcy Code allows a bankruptcy court to shield “[o]ther information” apart from “means of identification” to protect individuals against an

“undue risk of identity theft or other unlawful injury.” Accordingly, although an individual creditor’s physical and email addresses are not explicitly enumerated as a “means of identification,” they are nevertheless within the broad scope of section 107(c)(1)(B) of the Bankruptcy Code.

14. Cause therefore exists to authorize the Debtors to redact the physical and email addresses of any individual creditors from any paper filed or to be filed with the Court in the chapter 11 cases, including the consolidated list of creditors (the “**Creditor Matrix**”), Schedules of Assets and Liabilities (“**Schedules**”), and Statement of Financial Affairs (“**Statements**”). The Debtors have policies and practices in place to preserve personal identification information of their employees, independent contractors, customers, among other individuals, and intend to continue those policies and practices in these chapter 11 cases in the ordinary course.

15. Without such relief, the Debtors may unnecessarily render individuals more susceptible to identity theft and harassment by publishing their addresses without any advance notice or opportunity to opt out or take protective measures. Nevertheless, recognizing the need for transparency, the Debtors propose to provide unredacted copies of the Creditor Matrix, Schedules and Statements, or other documents filed with the Court or to be filed with the Court in these chapter 11 cases and redacted pursuant to the Order to (a) the Court, the U.S. Trustee, and counsel to any statutory committee appointed in these chapter 11 cases, and (b) any party in interest upon a request to the Debtors (email being sufficient) or to the Court that sets forth a reasonable basis for the request that is reasonably related to these chapter 11 cases. Nothing in the Order (a) precludes a party in interest’s right to file a motion requesting that the Court unseal information redacted in accordance with the Order or (b) waives or otherwise limits the service of any

document upon, or the provision of any notice to, any individual whose personal identifying information is sealed or redacted in accordance with the Order.

II. The Court Should Approve the Form and Manner of the Notice of Commencement of These Chapter 11 Cases

16. Bankruptcy Rule 2002(a)(1) provides, in relevant part, that “the clerk, or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustees at least 21 days’ notice by mail of: the meeting of creditors under § 341 or § 1104(b) of the Code.” Fed. R. Bankr. P. 2002(a)(1). Bankruptcy Rule 2002(f)(1) similarly provides that notice of the order for relief shall be sent by mail to all creditors. *See* Fed. R. Bankr. P. 2002(f). Finally, the Complex Case Procedures require that “the lead debtor in a jointly administered Complex Case must . . . if a Claims Agent has been appointed, use a Court-approved modified version of the Official Form 309F1 (Notice of chapter 11 case) to reflect the procedures approved for the services provided by the Claims Agent.” Complex Case Procedures § 14(b).

17. The Debtors propose to comply with the foregoing requirements by instructing Kurtzman Carson Consultants LLC to serve a notice of commencement, substantially in the form attached to the Order as **Exhibit 1** (the “**Notice of Commencement**”), on all parties listed on the Creditor Matrix advising them of (a) the commencement of these chapter 11 cases, (b) the meeting of creditors under section 341 of the Bankruptcy Code once such meeting has been scheduled by the U.S. Trustee, and (c) certain other information. Service of the Notice of Commencement will not only avoid confusion among creditors but will prevent the Debtors’ estates from incurring unnecessary costs associated with serving multiple notices to the parties listed on the Debtors’ Creditor Matrix. As such, the Debtors submit that service of the Notice of Commencement is warranted and satisfies the noticing requirements set forth in the Bankruptcy Rules and the Complex Case Procedures.

Emergency Consideration

18. 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

19. The Debtors will provide notice of this Motion to: (a) the Office of 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.

[Remainder of Page Intentionally Left Blank]

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

**ORDER (I) AUTHORIZING
THE DEBTORS TO REDACT CERTAIN PERSONALLY IDENTIFIABLE
INFORMATION, (II) APPROVING THE FORM AND MANNER OF THE
NOTICE OF COMMENCEMENT, AND (III) GRANTING RELATED RELIEF**

Upon the motion (the “**Motion**”)² of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”), authorizing the Debtors to (i) redact certain personally identifiable information, (ii) approving the form and manner of notice of commencement of these chapter 11 cases, and (iii) granting related relief, all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of and the opportunity for a hearing on the Motion having been given and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion and having heard the

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 <https://www.kcellc.net/zhi>. The location of the Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

statements in support of the relief requested therein at a hearing before this Court; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the relief requested in the Motion being in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having determined that the legal and factual bases set forth in the Motion and at the hearing establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Debtors are authorized to redact from any paper filed or to be filed with the Court in the chapter 11 cases, including the Creditor Matrix, the physical and email addresses of the Debtors' current and former employees, independent contractors, customers, creditors, and any other natural persons. The Debtors shall provide an unredacted version of the Creditor Matrix and any other filings redacted pursuant to this Order to (a) the Court, the U.S. Trustee, and counsel to any official committee appointed in the chapter 11 cases and (b) any party in interest upon a request to the Debtors (email being sufficient) or to the Court that is reasonably related to these chapter 11 cases; *provided*, that any receiving party shall not transfer or otherwise provide such unredacted document(s) to any person or entity not party to the request. The Debtors shall inform the Court and the U.S. Trustee promptly after denying any request for an unredacted document pursuant to this Order.

2. The Debtors are authorized to serve the Notice of Commencement, substantially in the form attached hereto as **Exhibit A**, on all parties on the Creditor Matrix. The form and manner of the Notice of Commencement of the chapter 11 cases and the scheduling of the meeting of creditors under section 341 of the Bankruptcy Code is hereby approved.

3. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion.

4. The Debtors are authorized to execute and deliver such documents and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

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

Dated: _____, 2024
Houston, Texas

UNITED STATES BANKRUPTCY JUDGE

Exhibit A

Form of Notice of Commencement

Information to identify the case:	
Debtor <u>Zachry Holdings, Inc.</u> <small>Name</small>	EIN <u>26 - 1 2 5 6 8 1 4</u>
United States Bankruptcy Court for the: <u>Southern District</u> District of <u>Texas</u> <small>(State)</small>	
Case number: <u>24 - 90377 (MI)</u>	Date case filed for Chapter 11: May 21, 2024

Official Form 309F (For Corporations or Partnerships)

Notice of Chapter 11 Bankruptcy Case

12/17

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at www.pacer.gov).

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

1. Debtor's full name: See chart below.

List of Jointly Administered Cases:

NO.	DEBTOR	OTHER NAMES USED IN LAST 8 YEARS	ADDRESS	CASE NO.	EIN #
1.	Zachry Holdings, Inc.		527 Logwood Avenue San Antonio, Texas 78221	24-90377	26-1256814
2.	Zachry EPC Holdings, LLC	ZEC Corporation	527 Logwood Avenue San Antonio, Texas 78221	24-90378	20-2340077
3.	Zachry Engineering Corporation		527 Logwood Avenue San Antonio, Texas 78221	24-90379	20-3603134
4.	Zachry High Voltage Solutions, LLC		527 Logwood Avenue San Antonio, Texas 78221	24-90381	20-5791090
5.	ZEC New York, Inc.		527 Logwood Avenue San Antonio, Texas 78221	24-90380	31-0825897
6.	UE Properties, Inc.		527 Logwood Avenue San Antonio, Texas 78221	24-90382	75-2052226
7.	ZEC Michigan, Inc.	ZNE Michigan, Inc.	527 Logwood Avenue San Antonio, Texas 78221	24-90383	20-0404627
8.	Zachry Industrial, Inc.		527 Logwood Avenue San Antonio, Texas 78221	24-90385	74-2887583
9.	Zachry Constructors, LLC		527 Logwood Avenue San Antonio, Texas 78221	24-90384	85-3449094
10.	Moss Point Properties, LLC		527 Logwood Avenue San Antonio, Texas 78221	24-90387	46-0851616
11.	Zachry Enterprise Solutions, LLC		527 Logwood Avenue San Antonio, Texas 78221	24-90386	85-3532706

12.	Zachry Nuclear, Inc.		527 Logwood Avenue San Antonio, Texas 78221	24-90389	26-3117807
13.	Zachry Nuclear Construction, Inc.		527 Logwood Avenue San Antonio, Texas 78221	24-90388	26-3383241
14.	Zachry Nuclear Engineering, Inc.		527 Logwood Avenue San Antonio, Texas 78221	24-90390	06-1067568
15.	Computer Simulation & Analysis, Inc.		527 Logwood Avenue San Antonio, Texas 78221	24-90391	82-0424097
16.	Zachry Plant Services Holdings, Inc.	JVZ Industrial Services, Inc.	527 Logwood Avenue San Antonio, Texas 78221	24-90392	46-0901383
17.	JVIC Fabrication, LLC		527 Logwood Avenue San Antonio, Texas 78221	24-90393	85-3659726
18.	Zachry Industrial Americas, Inc.		527 Logwood Avenue San Antonio, Texas 78221	24-90394	27-1310902
19.	Zachry Maintenance Services, LLC		527 Logwood Avenue San Antonio, Texas 78221	24-90395	85-3519005
20.	J.V. Industrial Companies, LLC	J.V. Industrial Companies, Ltd.	3741 Red Bluff Road Pasadena, Texas 77503	24-90396	76-0660821
21.	Madison Industrial Services Team, LLC	Madison Industrial Services Team, Ltd.	3741 Red Bluff Road Pasadena, Texas 77503	24-90397	20-0696261

<p>2. All other names used in the last 8 years: See chart above.</p>				
<p>3. Address: See chart above.</p>				
<p>4. Debtor's attorneys:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top; padding: 5px;"> <p>WHITE & CASE LLP Charles R. Koster (TX Bar. No. 24128278) 609 Main Street, Suite 2900 Houston, Texas 77002 Telephone: (713) 496-9700 Facsimile: (713) 496-9701 Email: charles.koster@whitecase.com</p> <p style="text-align: center;">- and -</p> <p>WHITE & CASE LLP Bojan Guzina Andrew O'Neill 111 South Wacker Drive Suite 5100 Chicago, Illinois 60606 Email: bojan.guzina@whitecase.com Email: aoneill@whitecase.com</p> </td> <td style="width: 50%; vertical-align: top; padding: 5px;"> <p>Debtors' notice and claims agent (for court documents and case information inquiries):</p> <p>If by First-Class Mail:</p> <p>[•]</p> <p>If by Hand Delivery or Overnight Mail:</p> <p>[•]</p> </td> </tr> </table>			<p>WHITE & CASE LLP Charles R. Koster (TX Bar. No. 24128278) 609 Main Street, Suite 2900 Houston, Texas 77002 Telephone: (713) 496-9700 Facsimile: (713) 496-9701 Email: charles.koster@whitecase.com</p> <p style="text-align: center;">- and -</p> <p>WHITE & CASE LLP Bojan Guzina Andrew O'Neill 111 South Wacker Drive Suite 5100 Chicago, Illinois 60606 Email: bojan.guzina@whitecase.com Email: aoneill@whitecase.com</p>	<p>Debtors' notice and claims agent (for court documents and case information inquiries):</p> <p>If by First-Class Mail:</p> <p>[•]</p> <p>If by Hand Delivery or Overnight Mail:</p> <p>[•]</p>
<p>WHITE & CASE LLP Charles R. Koster (TX Bar. No. 24128278) 609 Main Street, Suite 2900 Houston, Texas 77002 Telephone: (713) 496-9700 Facsimile: (713) 496-9701 Email: charles.koster@whitecase.com</p> <p style="text-align: center;">- and -</p> <p>WHITE & CASE LLP Bojan Guzina Andrew O'Neill 111 South Wacker Drive Suite 5100 Chicago, Illinois 60606 Email: bojan.guzina@whitecase.com Email: aoneill@whitecase.com</p>	<p>Debtors' notice and claims agent (for court documents and case information inquiries):</p> <p>If by First-Class Mail:</p> <p>[•]</p> <p>If by Hand Delivery or Overnight Mail:</p> <p>[•]</p>			
<p>5. Bankruptcy clerk's office</p> <p>Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at www.pacer.gov.</p>	<p>United States Courthouse 515 Rusk Avenue Houston, Texas 77002</p> <p>All documents in this case are available free of charge on the website of the Debtors' notice and claims agent at [•]</p>	<p>Hours Open: Monday – Friday 8:00 AM – 5:00 PM</p> <p>Contact Phone: 713-250-5500</p>		
<p>6. Meeting of creditors</p> <p>The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.</p>	<p>Date and time to be determined.</p> <p>The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.</p>			

For more information, see page 4 ►

Debtor Zachry Holdings, Inc.
NameCase number (if known) 24-90377**7. Proof of claim deadline:****Not yet set. If a deadline is set, notice will be sent at a later time.**

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at www.uscourts.gov or any bankruptcy clerk's office.

Your claim will be allowed in the amount scheduled unless:

- your claim is designated as *disputed*, *contingent*, or *unliquidated*;
- you file a proof of claim in a different amount; or
- you receive another notice.

If your claim is not scheduled or if your claim is designated as *disputed*, *contingent*, or *unliquidated*, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at www.pacer.gov.

Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

8. Exception to discharge deadline

The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.

If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline stated below.

Deadline for filing the complaint: To be determined

9. Creditors with a foreign address

If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.

10. Filing a Chapter 11 bankruptcy case

Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.

11. Discharge of debts

Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.