

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> <sup>1</sup>	)	)	Case No. 24-90377 (MI)
Debtors.	)	)	(Jointly Administered)

**DEBTORS’ MOTION FOR ENTRY OF AN ORDER EXTENDING  
THE EXCLUSIVE PERIODS TO FILE AND SOLICIT A PLAN**

**If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this application was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this application was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) state as follows in support of this motion (this “**Motion**”):

**PRELIMINARY STATEMENT**

1. The Debtors commenced these chapter 11 cases with the goals of (i) continuing their current operations in chapter 11 with as little disruption as possible, (ii) maintaining the confidence and support of their employees, customers and vendors, (iii) negotiating a structured exit from the role of lead contractor on the Golden Pass LNG Terminal project (the “**GPX Project**”), and (iv) proposing and confirming a plan of reorganization.

<sup>1</sup> 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.veritaglobal.net/ZHI](http://www.veritaglobal.net/ZHI). The location of the Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.



2. The Debtors have worked diligently to achieve these goals, and in fewer than four months, have realized most of them. With the guidance of the court-appointed mediator, Judge Christopher M. Lopez, the Debtors, Golden Pass LNG Terminal LLC, CB&I LLC, Chiyoda International Corporation, and CCZJV (collectively, the “**GPX Settlement Parties**”) were able to reach a global settlement (the “**GPX Settlement**”) resulting in the Debtors’ exit from the GPX Project. The Court approved the GPX Settlement on an interim basis on July 25, 2024, and on a final basis on August 12, 2024. As the Court noted, the GPX Settlement “took remarkable decision-making and guidance and leadership” by the GPX Settlement Parties, and “[i]t’s good for everybody concerned.” *See* Aug. 12, 2024 Hr’g Tr. 17:24–25; 18:3. The Court also noted that, with the GPX Settlement approved, “Zachry [] is poised to return” and once again be “a formidable force in its field and its business” after emerging from these chapter 11 cases. *Id.* at 18:2-3. The financial burden placed on the Debtors by the GPX Project was a key factor in the Debtors’ decision to file these chapter 11 cases, and finalizing the GPX Settlement has paved the way for the Debtors to develop a plan of reorganization and emerge from bankruptcy.

3. The Debtors have accomplished much more in their brief time in chapter 11, including the following:

- **Critical Operational Relief.** The Debtors worked diligently to stabilize business operations by obtaining critical first- and second-day relief. They also engaged with critical vendors across their many active projects to ensure minimal interruption to their businesses. The Debtors have maintained constant and open dialogue with their employees, vendors and major customers throughout the chapter 11 cases.
- **Use of Cash Collateral on a Consensual Basis.** The Debtors worked collaboratively with their prepetition secured lenders to negotiate the terms of consensual use of cash collateral to fund these chapter 11 cases, ensuring minimal disruption to the business.
- **Claims Process and Bar Date Motion.** On July 16, 2024, the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs (as amended, including on August 30, 2024, the “**Schedules and Statements**”). On

July 19, 2024, the Debtors filed the *Motion for Entry of an Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, (IV) Approving Notice of Bar Dates, and (V) Granting Related Relief* [Docket No. 589] (the “**Bar Date Motion**”). On July 26, 2024, the Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, (IV) Approving Notice of Bar Dates, and (V) Granting Related Relief* [Docket No. 636] (the “**Bar Date Order**”) setting the general bar date as September 16, 2024, at 5:00 p.m. (prevailing Central Time) (the “**Bar Date**”) and the governmental bar date as November 18, 2024, at 5:00 p.m. (prevailing Central Time). The general bar date for claims related to the amended Schedules and Statements is October 4, 2024, at 5:00 p.m. (prevailing Central Time). To date, over one-thousand proofs of claim have been filed against the estates and many more are expected. The Debtors continue to evaluate claims that have been, or may be, asserted against the estates.

- **Assumption and Rejection of Contracts.** The Debtors spent significant time evaluating their executory contracts and have filed motions either to reject or to assume and assign nearly all of the contracts related to the GPX Project. On July 20, 2024, the Debtors filed their *First Omnibus Motion for Entry of an Order Authorizing the Rejection of Certain Unexpired Personal Property Leases and Related Executory Contracts Effective as of July 20, 2024* [Docket No. 591] (the “**First Omnibus Rejection Motion**”). On August 12, 2024, the Court entered the *Order Granting Debtors’ First Omnibus Motion for Entry of an Order Authorizing the Rejection of Certain Unexpired Personal Property Leases and Related Executory Contracts Effective as of July 20, 2024* [Docket No. 737] (the “**First Omnibus Rejection Order**”). On August 10, 2024, the Debtors filed their *Second Omnibus Motion for Entry of an Order Authorizing the Rejection of Certain Executory Contracts Effective as of August 10, 2024* [Docket No. 730] (the “**Second Omnibus Rejection Motion**”). On August 14, 2024, the Debtors filed their *First Omnibus Motion for Entry of an Order Authorizing the Assumption and Assignment of Certain GPX Project Executory Contracts* [Docket No. 830] (the “**First Omnibus Assumption Motion**”).

4. The Debtors have also reached agreements on other large projects to pay vendors, mitigate potential claims, modify completion dates, and obtain additional compensation. The Debtors are now in a position to focus on the plan process and emergence from bankruptcy. The Debtors are currently working closely with their prepetition secured lenders and other key creditor constituents to propose a consensual plan that will maximize value for all stakeholders. The

Debtors are seeking an extension of their exclusive periods to file and solicit a plan of reorganization in order to bring these cases to a close in orderly fashion.

**RELIEF REQUESTED**

5. The Debtors seek entry of an order, substantially in the form attached hereto (the “**Order**”), extending (a) the period during which the Debtors have the exclusive right to file a chapter 11 plan (the “**Exclusive Filing Period**”) by 90 days, through and including December 17, 2024 and (b) the period during which the Debtors have the exclusive right to solicit a plan (the “**Exclusive Solicitation Period**”, and together with the Exclusive Filing Period, the “**Exclusive Periods**”) by 90 days, through and including February 15, 2025, without prejudice to the Debtors’ right to seek further extensions.<sup>2</sup> The Debtors’ initial Exclusive Filing Period and Exclusive Solicitation Period are currently set to expire on September 18, 2024 and November 17, 2024, respectively.

**Jurisdiction, Venue, and Predicates for Relief**

6. 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.

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

8. The predicates for the relief requested herein are section 1121 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “**Bankruptcy Code**”).

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<sup>2</sup> Pursuant to paragraph 30 of the *Procedures for Complex Cases in the Southern District of Texas*, the Debtors’ Exclusive Filing Period is automatically extended until the Court rules on this Motion.

### **Background**

9. On May 21, 2024 (the “**Petition Date**”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned chapter 11 cases. 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. These chapter 11 cases are being jointly administered pursuant to Bankruptcy Rule 1015(b). No party has requested the appointment of a trustee or examiner in these chapter 11 cases. On June 4, 2024, the Office of the United States Trustee for the Southern District of Texas appointed an official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the “**Committee**”) [Docket No. 176].

10. A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to these chapter 11 cases, is set forth in the *Declaration of Mohsin Y. Meghji in Support of Debtors’ Petitions and Requests for First Day Relief* [Docket No. 7] (the “**First Day Declaration**”).

11. On July 16, 2024, the Debtors filed their Schedules and Statements. On August 30, 2024, several of the Debtors amended their Schedules and Statements.

12. On July 19, 2024, the Debtors filed the Bar Date Motion. On July 26, 2024, the Court entered the Bar Date Order.

13. On July 20, 2024, the Debtors filed the First Omnibus Rejection Motion. On August 12, 2024, the Court entered the First Omnibus Rejection Order, authorizing the Debtors to reject executory contracts related to the GPX Project. On August 10, 2024, the Debtors filed the Second Omnibus Rejection Motion, seeking to reject additional executory contracts and unexpired leases. On August 14, 2024, the Debtors filed the First Omnibus Assumption Motion.

14. On May 28, 2024, the Court entered the *Joint Stipulation and Agreed Order Appointing Mediator and Governing Mediation Procedures* [Docket No. 118] appointing Judge Christopher M. Lopez as mediator to facilitate negotiations among the GPX Settlement Parties in connection with a comprehensive resolution of any and all issues relating to the GPX Project, the EPC Contract, the HJVA, and all other matters agreed to among the Parties. Mediation began on June 1, 2024. On July 19, 2024, the Debtors filed their *Emergency Motion for Interim and Final Order (I) Approving the Settlement by and Among the Debtors, Golden Pass LNG Terminal LLC, CB&I LLC, Chiyoda International Corporation, and CCZJV, (II) Authorizing the Parties to Perform Any and All Obligations Contemplated by the Settlement, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief* [Docket No. 587]. The Court entered an interim order approving the GPX Settlement on July 25, 2024, after a hearing on July 24, 2024. After a hearing on August 12, 2024, the Court entered a final order approving the GPX Settlement, allowing the Debtors to exit from their role as lead contractor for the GPX Project.

### **Basis for Relief**

#### **I. Section 1121(d) of the Bankruptcy Code Permits the Court to Extend the Exclusive Periods for “Cause”**

15. The Bankruptcy Code provides for an initial period of 120 days after the commencement of a chapter 11 case during which a debtor has the exclusive right to file a chapter 11 plan. 11 U.S.C. § 1121(b). If a debtor files a plan within that 120 day period, it has a 180 day period from its petition date to solicit acceptance of its plan. 11 U.S.C. § 1121(c)(3). These exclusive periods afford a debtor the opportunity to propose and solicit acceptances of a chapter 11 plan, without the disruption to business operations that would ensue from competing plans being filed by non-debtor parties.

16. Section 1121(d) of the Bankruptcy Code allows the Court to extend a debtor's exclusive periods for "cause". 11 U.S.C. § 1121(d). Although the Bankruptcy Code does not define "cause" for the purposes of an extension under section 1121(d), the legislative history of section 1121 indicates that the term should be viewed flexibly, "in order to allow the debtor to reach an agreement" with its creditors. *See* H.R. Rep. No. 95-595, at 231-32 (1978), *reprinted in* 1978 U.S.C.C.A.N. 5963, 6191. Bankruptcy courts are afforded broad discretion in determining whether "cause" exists and should be based upon the facts and circumstances of these chapter 11 cases. *In re Adelpia Commc'ns Corp.*, 352 B.R. 578, 587 (Bankr. S.D.N.Y. 2006).

17. Courts generally consider the following factors in determining whether "cause" exists to extend a debtor's exclusive periods under section 1121(d):

- a) the size and complexity of the case;
- b) the need for sufficient time to permit the debtor to negotiate a plan of reorganization and prepare adequate information;
- c) whether the debtor has made progress in negotiations with its creditors;
- d) the existence of good-faith progress toward reorganization;
- e) whether the debtor is seeking to extend exclusivity to pressure creditors to accede to the debtor's reorganization demands;
- f) whether the debtor has demonstrated reasonable prospects for filing a viable plan;
- g) the fact that the debtor is paying its bills as they become due;
- h) the amount of time which has elapsed in the case; and/or
- i) whether an unresolved contingency exists.

*See, e.g., In re New Millenium Mgmt., LLC*, No. 13-35719-H3-11, 2014 Bankr. LEXIS 734, \*18-19 (Bankr. S.D. Tex. Feb. 25, 2014) (citing *In re GMG Capital Partners III, L.P.*, 503 B.R. 596 (Bankr. S.D.N.Y. 2014)); *see also In re Express One Int'l, Inc.*, 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996) (noting that the nine factors listed above have been used by courts to “determin[e] whether ‘cause’ exists”); *In re Adelpia Commc’ns Corp.*, 352 B.R. at 587. Further, the above factors are not the exclusive bases for the exercise of a court’s discretion to extend a debtor’s exclusive periods. The Court can elect to extend the exclusive periods for “cause” in the absence of one or more of the factors. *In re Express One Int'l, Inc.*, 194 B.R. at 100 (finding that four of the factors were relevant in determining whether “cause” existed to extend exclusivity); *In re United Press Int'l, Inc.*, 60 B.R. 265, 269 (Bankr. D.D.C. 1986) (finding that the debtor showed “cause” to extend exclusivity based upon three of the factors).

## **II. “Cause” Exists to Extend the Debtors’ Exclusive Periods**

### **A. The Debtors’ chapter 11 cases are large and complex.**

18. These chapter 11 cases are large and complex. This factor alone supports an extension of exclusivity. *In re Express One Int'l, Inc.*, 194 B.R. at 100 (noting that the traditional ground for cause is the large size of the debtor and the difficulty in formulating a plan). The 21 Debtors have thousands of creditors, \$281 million in secured debt,<sup>3</sup> and over \$5.4 billion in operating revenue<sup>4</sup> on a consolidated basis. The Debtors are involved in numerous large construction projects worth tens of billions of dollars.

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<sup>3</sup> *See* Fourth Interim Cash Collateral Order at ¶ F(c).

<sup>4</sup> First Day Declaration at ¶ 27.



**B. The Debtors require sufficient time to formulate a plan of reorganization.**

19. This is the Debtors' first request for an extension of the Exclusive Periods. As discussed above, in fewer than four months, the Debtors negotiated the GPX Settlement, stabilized their businesses, and obtained the consensual use of cash collateral. The Debtors have accomplished a great deal in these chapter 11 cases and now require additional time to develop a plan of reorganization.

**C. The Debtors have made good-faith progress toward exiting chapter 11**

20. In addition to the GPX Settlement, the Debtors have (i) obtained critical financial and operational relief, (ii) prepared and filed their Schedules and Statements, (iii) established the Bar Date for filing proofs of claim, (iv) developed a go-forward business plan, and (v) actively engaged with their existing lenders on capital solutions for emergence from bankruptcy.

**D. The Debtors are not attempting to pressure or coerce creditors.**

21. The Debtors are not seeking an extension of the Exclusive Periods to pressure or prejudice creditors. The Debtors seek an extension of time to engage with their creditors and propose a plan that will best serve the interests of the Debtors and their stakeholders, and to ensure maximum recovery for all stakeholders. The additional time will allow the Debtors to further engage with their creditors without the potential distraction that would be created by competing plans.

**E. The Debtors have reasonable prospects for filing a viable plan.**

22. The Debtors and their advisors have made significant progress towards negotiating and proposing a plan of reorganization, and simply require more time to see these efforts through and avoid the distraction of competing plans.

**F. The Debtors are paying their bills as they come due.**

23. Since the Petition Date, the Debtors have paid their vendors and creditors in the ordinary course of business or as otherwise authorized pursuant to orders of the Court.

**G. These cases are not even four months old.**

24. A relatively short amount of time has elapsed since the Petition Date. As discussed above, in fewer than four months, the Debtors have resolved several gating issues and have worked with creditors on a value-maximizing plan. The Debtors' accomplishments during the short time they have spent in chapter 11 weigh in favor of extending the Exclusive Periods.

**H. Unresolved contingencies exist.**

25. Despite the progress that the Debtors have made thus far, unresolved contingencies still exist, including various unresolved claims against the estates. The Bar Date is September 16, 2024. Once the Bar Date passes, the Debtors can begin assessing the claims against them, which will help solidify the Debtors' plan of reorganization.

**Notice**

26. The Debtors will provide notice of this Motion to: (a) the United States Trustee for the Southern District of Texas; (b) counsel for the Committee; (c) the Prepetition Agent; (d) the United States Attorney's Office for the Southern District of Texas; (e) the state attorneys general for the states in which the Debtors operate; (f) the Internal Revenue Service; and (g) 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 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: September 10, 2024  
Houston, Texas

*/s/ Charles R. Koster*

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**WHITE & CASE LLP**

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*Counsel to the Debtors and  
Debtors in Possession*

**Certificate of Service**

I certify that on September 10, 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**

In re:	)	
	)	Chapter 11
ZACHRY HOLDINGS, INC., <i>et al.</i> <sup>1</sup>	)	Case No. 24-90377 (MI)
Debtors.	)	(Jointly Administered)
	)	Re: Docket No. ____

**ORDER EXTENDING THE DEBTORS’  
EXCLUSIVE PERIODS TO FILE AND SOLICIT A PLAN**

Upon the motion (the “**Motion**”)<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”), extending the periods during which the Debtors have the exclusive rights to file and solicit a chapter 11 plan, all as more fully set forth in the Motion, pursuant to 11 U.S.C. §1121; 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); and that this Court may enter a final order consistent with Article III of the United States Constitution; 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 the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court, if any (the “**Hearing**”); and

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<sup>1</sup> 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.veritaglobal.net/ZHI](http://www.veritaglobal.net/ZHI). The location of the Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing, if applicable, establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Debtors' Exclusive Filing Period is extended through and including December 17, 2024.

2. The Debtors' Exclusive Solicitation Period is extended through and including February 15, 2025.

3. Entry of this order shall be without prejudice to the Debtors' right to seek a further extension of the Exclusive Periods.

4. The Debtors are authorized, but not directed, 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. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

7. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

8. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.

Signed: \_\_, 2024

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MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

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

	)	
In re:	)	Chapter 11
	)	
ZACHRY HOLDINGS, INC., <i>et al.</i> <sup>1</sup>	)	Case No. 24-90377 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	Re: Docket No. ____

**ORDER EXTENDING THE DEBTORS’  
EXCLUSIVE PERIODS TO FILE AND SOLICIT A PLAN**

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Upon the motion (the “**Motion**”)<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”), extending the periods during which the Debtors have the exclusive rights to file and solicit a chapter 11 plan, all as more fully set forth in the Motion, pursuant to 11 U.S.C. §1121; 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); and that this Court may enter a final order consistent with Article III of the United States Constitution; 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 the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court, if any (the “**Hearing**”); and

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.



this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing, if applicable, establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Debtors' Exclusive Filing Period is extended through and including December 17, 2024.

2. The Debtors' Exclusive Solicitation Period is extended through and including February 15, 2025.

3. Entry of this order shall be without prejudice to the Debtors' right to seek a further extension of the Exclusive Periods.

4. The Debtors are authorized, but not directed, 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. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

7. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

8. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.

Signed: \_\_, 2024

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MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE