

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)
)	

**FOURTH DECLARATION OF J. STEPHEN BARRICK IN SUPPORT OF
DEBTORS’ APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING THE RETENTION AND EMPLOYMENT OF
HICKS THOMAS LLP AS SPECIAL LITIGATION COUNSEL
TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

I, J. Stephen Barrick, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner of the firm of Hicks Thomas LLP (“**Hicks Thomas**” or the “**Firm**”), a law firm which maintains offices for the practice of law at, among other locations, 700 Louisiana, Suite 2300, Houston Texas, 77002. I am a member in good standing of the Bar of the State of Texas, and I have been admitted to practice in the United States Supreme Court; the United States Courts of Appeals for the Fifth, Ninth, Tenth, and Federal Circuits; and the United States District Courts for all districts in Texas. There are no disciplinary proceedings pending against me in any jurisdiction.

2. I submit this Fourth declaration (the “**Fourth Declaration**”) in support of the *Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of Hicks Thomas LLP as Special Litigation Counsel to the Debtors Effective as of the Petition Date* (the “**Application**”), filed June 7, 2024 [Docket No. 219].² My first declaration (the “**First**

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’ 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.

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



Declaration”) in support of the Application was attached to the Application. My second declaration (the “**Second Declaration**”) in support of the Application was filed July 3, 2024 [Docket No. 412]. My third declaration (the “**Third Declaration**”) in support of the Application was filed August 12, 2024 [Docket No. 724].

3. As set forth in my First Declaration, within the past 12 months Hicks Thomas has represented and currently represents certain entities that are Potential Parties in Interest (PPII’s) in a variety of litigation matters unrelated to these chapter 11 cases. **Schedule 2** to my First Declaration identified those entities. Since my First Declaration additional Potential Parties in Interest have been identified in the chapter 11 cases.

4. Accordingly, I am submitting a revised **Schedule 2** to reflect the addition of four PPIIs. See revised **Schedule 2** attached hereto.

5. Except as otherwise noted, all facts set forth in this Declaration are based upon my personal knowledge, information supplied to me by other Hicks Thomas professionals or paraprofessionals or learned from my review of relevant documents. To the extent any information disclosed herein requires amendment or modification as additional information becomes available to Hicks Thomas, I will submit a supplemental declaration to this Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Houston, Texas
Dated: September 9, 2024

Respectfully submitted,

/s/ J. Stephen Barrick
J. Stephen Barrick

Schedule 2

Name
American Zurich Ins. Co.
Apache Corporation
CB&I
Chevron
Chiyoda International Corporation
Cigna Healthcare of Texas
Exxon Mobil Corporation
Hallmark Specialty Insurance Company
JVIC
Kinder Morgan Operating, et al.
Marathon Petroleum Company LP
McDermott
MZJV-GPX (unincorporated Joint Venture between ZII and CB&I/McDermott)
NES Global, LLC
North Shore Steel
The Travelers Companies, Inc.
Total Safety
Zachry Engineering Corporation
Zachry Group
Zachry Industrial, Inc.
Zachry, LLC
Zurich American Insurance Company