

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)

ORDINARY COURSE PROFESSIONAL DECLARATION OF  
HUNTON ANDREWS KURTH LLP

I, Holly Williamson, make this declaration (this “**Declaration**”) under penalty of perjury:

1. I am a partner of Hunton Andrews Kurth LLP, located at 600 Travis Street, Suite 4200, Houston, Texas 77002 (the “**Firm**”).

2. This Declaration is submitted in accordance with the *Order (I) Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief* [Docket No. 341].

3. The Debtors in these chapter 11 cases have requested that the Firm provide general labor and employment legal services to the Debtors, namely Zachry Industrial, and the Firm has consented to provide such services.

4. The Firm may have performed services in the past, may currently perform services, and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors’ chapter 11 cases. The Firm represents Whitebox Advisors LLC (“Whitebox”) in connection with these chapter 11 cases. The Debtors’ General

<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 <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.



Counsel is aware of this representation and has consented to the representation. The Firm does not believe that its representation of Whitebox would cause the Firm to be adverse to the Debtors or their estates as it relates to the labor and employment legal services that the Firm is proposed to provide the Debtors.

5. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants, and parties in interest in these chapter 11 cases.

6. Neither I nor any principal, partner, director, officer of, or professional employed by, the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principal and regular employees of the Firm.

7. Neither I nor any principal, partner, director, officer, of or professional employed by, the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matter(s) upon which this Firm is to be employed.

8. The Debtors owe the Firm nothing for prepetition services, the payment of which is subject to limitations contained in the United States Bankruptcy Code, 11 U.S.C. §§ 101–1532.

9. I understand that the amount owed by any of the Debtors to the Firm for prepetition services will be treated as a general unsecured claim, and, as such, the Firm may file a proof of claim.

10. I further understand that this Declaration will not suffice as the Firm's proof of claim.

11. As of May 21, 2024, which was the date on which the Debtors commenced these chapter 11 cases, the Firm was not a party to an agreement for indemnification with certain of the Debtors.

12. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

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

Date: Sept 17, 2024

  
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Holly Williamson