

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)

**THIRD DECLARATION OF BOJAN GUZINA IN SUPPORT OF  
DEBTORS’ APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING  
THE RETENTION AND EMPLOYMENT OF WHITE & CASE LLP AS  
ATTORNEYS TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

---

I, Bojan Guzina, 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 law firm of White & Case LLP (“**White & Case**” or the “**Firm**”). I am over the age of eighteen, am authorized to submit this declaration, and am competent to testify on the matters addressed in this third declaration (the “**Third Declaration**”).

2. I submit this Third Declaration in support of the *Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date* (the “**Application**”) [Docket No. 217], filed June 7, 2024 by the Debtors,<sup>2</sup> and to supplement the disclosures set forth in the *Declaration of Bojan Guzina in Support of Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date*, attached as

<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’ claims and noticing agent at [www.kccllc.net/zhi](http://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.

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



Exhibit A to the Application (the “**First Declaration**”), and the *Second Declaration of Bojan Guzina in Support of Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date* (the “**Second Declaration**”) [Docket No. 647].

3. Except as otherwise indicated, all facts set forth in this Third Declaration are based upon my personal knowledge, information provided to me by other White & Case 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 White & Case, I will submit a supplemental declaration to this Court reflecting such amended or modified information.

4. As noted in my First Declaration, White & Case will review its files periodically during the pendency of these chapter 11 cases to ensure that no conflicts or other disqualifying circumstances arise or any new or additional connections to parties in interest arise. If any new relevant facts or relationships are discovered or arise, White & Case will use reasonable efforts to identify such developments and will promptly file a supplemental declaration.

5. In connection with the First Declaration, White & Case obtained from the Debtors and their agents the names of persons and entities that may be parties in interest in these chapter 11 cases (the “**Potential Parties in Interest**”), and such parties are listed on Schedule 1 to my First Declaration (the “**Potential Parties in Interest List**”). In connection with the Second Declaration, White & Case obtained from the Debtors and their agents a supplement to the Potential Parties in Interest List with the names of additional Potential Parties in Interest, which are listed on Schedule 1 to my Second Declaration (the “**Second Potential Parties in Interest List**”). Thereafter, the Debtors and their agents supplemented the lists of Potential Parties in

Interest with the names of additional Potential Parties in Interest, which are listed on **Schedule 1** attached hereto (the “**Third Potential Parties in Interest List**”).

6. Following the procedure set forth in my First Declaration, White & Case conducted a disclosure review with respect to the Firm’s connections to the names listed on the Third Potential Parties in Interest List. Based on the results of White & Case’s searches of the names on the Third Potential Parties in Interest List, **Schedule 2** annexed hereto identifies that White & Case currently represents, or has represented in the last two years, certain individuals, entities, or their affiliates who are Potential Parties in Interest in matters wholly unrelated to the Debtors, these Chapter 11 Cases, or such entities’ claims against or interests in the Debtors. Of the entities listed on **Schedule 2**, none represented more than 1% of White & Case’s revenue for the 12-month period ending August 31, 2024.

7. Based upon the information available to me, after following the procedures described herein, I believe that (i) White & Case is a “disinterested person” within the meaning of section 101(14) of the Bankruptcy Code, as required by section 327(a) of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtors’ estates; and (ii) White & Case has no connection with any of the Debtors, their affiliates, their creditors, or any other party-in-interest, or their respective attorneys and accountants, or any persons employed by the U.S. Trustee or the Court, except as may be disclosed in this Third Declaration (including **Schedule 2**) or my First or Second Declarations.

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.

Chicago, Illinois  
Dated: September 20, 2024

Respectfully submitted,

/s/ Bojan Guzina  
Bojan Guzina

**Schedule 1****Potential Parties in Interest****Contract Counterparty**

24 Hr Safety LLC	DISA GLOBAL SOLUTION INC
Able Fastener Inc	DocuSign Inc
Aces Global Quality Services U	DOTGROUP INTERNATIONAL USA
Admiral Field Services, LLC	DTN, LLC
Adventa Soft INC	E2 Optics, LLC
Alamo Filters	EARTHCAM INC
ALERE	Eastex Rubber & Gasket Co
Allredi Holdings LLC	ELCOMETER INC
Allserv Industrial LLC	Energy Engg Americas LLC
Allterra Central INC	Entact Environmental Services
ALP Right of Way, Inc.	ENTERGY TEXAS
ALS Maverick Testing Laboratories, Inc.	EnviroCon Systems, Inc.
American Equipment Company Inc.	Envision Technology Solutions
Analytic Stress Relieving, Inc.	FEDEX CORPORATION
Anixter Inc	FEDEX FREIGHT
Armorshred LP	FERGUSON ENTERPRISES LLC
ASAP Drug Solutions Inc	FLEXITALLIC US LLC
AT&T Mobility II LLC	FLOWORKS USA LP
Atlas RFID Solutions, LLC	Foster Safety
Austin Fire Systems	Future Align
Azarmehr and Associates PC	GARNER DISTRIBUTED WORKFLOW LL
B&E Resources	GCS & S INC
Baker Hughes (dba P&M USA LLC)	General Equipment & Supply
Barricade Buddy LLC	GFL ENVIRONMENTAL SOLID WASTE
Bell Telephone Company dba AT&T Texas	GHX INDUSTRIAL LLC
Bentley Systems INC	GOPHER MATS LLC
BILL CLARK PEST CONTROL, INC	Granger Chevrolet Inc
Bottom Line Equipment LLC	Great Western Valve Inc
BRANDSAFWAY LLC	GS GLOBAL SUPPLY LP
CalCam Logistics & Contracting, LLC	GT WELD TESTING LLC
CCJ & Associates LLC	GuardTech Pest Management, Inc.
Cedar Port Navigation & Improv	Gulf Coast Fabricators Inc
Classic Forms And Products	GW Parts Group Inc
COASTAL PRESSURE PRODUCTS LLC	H2L Consulting LLC
Coastal Welding Supply Inc	Hanes Companies Inc
Consolidated Pipe & Supply Co	HARTFORD STEAM BOILER INSP & I
Construction Supply Holdings I	Hartmann Building Specialties
COWBOY INDUSTRIAL SALES INC	Hawk Technical Services LLC
Crane Certification Inspection	Heritage Environmental Services
CSM Industrial	Hilti Inc
Cymansys Solutions LLC	Holes Golden Triangle LLC
Deep South Crane & Rigging, LLC	Home Depot
DEF Rentals, LLC	Hotard Coaches, Inc.
DENNY HASTINGS FLP 14	Houston Area Safety Council
Derrick Oil & Supply Co Inc	I&I Insulations LLC
DHL EXPRESS USA INC	Industrial Safety Training
	Industrial Supply & Rental LLLC

Industrial Supply Inc  
Infinity Auto Express Inc  
Instant Technologies Inc  
INSU-W-RAPID AMERICAS LLC  
International Property Develop dba The  
Signature Group  
International SOS Health Care Services US Inc.  
(Prime Med)  
Intertek surveying Services (USA), LLC  
Invacor Solutions, LLC  
Isco Industries, Inc.  
IWS Gas and Supply of Texas LT  
James Meehan  
Johnson Controls  
JT Thorpe & Son  
KAT  
KAT Excavation & Construction, Inc.  
Keilers Holding, Inc. dba CY-Fair Tire  
Kennedy Wire Rope & Sling Co  
Kentech Technical Services  
KT Maintenance Company Inc  
LANCE RENTAL COMPANY  
LD SIGNS LLC  
Lender Protective Services, Inc.  
LGC US ASSET HOLDINGS LLC  
Lighthouse Video Surveillance, LLC  
Linda J OGrady  
Lloyd Engineering, Inc  
Lone Star Fasteners  
Louis F Puig MD  
Louisiana Radio Communications  
Lucy Software BV/Prometheus  
Lumeri LLC  
M&M Valve and Regulator, LLC  
Mammoet USA South, Inc  
Manning's Supply Company, LLC. dba  
Manning's Office Solutions  
Marking Services, Inc.  
Marsh Bond  
MARTIN CREEK HOLDINGS LLC  
Martin Marietta Materials, Inc.  
MCG Energy Solutions LLC  
MCLELLAN EQUIPMENT INC  
Mellvain Enterprises, Inc  
MEI SOLUTIONS LLC  
MERCER TRANSPORT CO  
MESA LABORATORIES  
MGX Equipment Services LLC  
MIDWEST HOSE & SPECIALTY INC  
MINERAL TECH GULF COAST ABRASI  
MLN Service Company  
MMR Constructors Inc.  
MONCLAS INCORPORATED  
MPC Solutions LLC  
MSDSOONLINE  
Naegeli Transportation Inc  
NES FIRCROFT  
NES GLOBAL LLC  
NEW PIG CORPORATION  
Newtron Beaumont LLC  
North Shore Steel  
O3 INSIGHT INC  
One Gas Inc  
Oracle America Inc  
P&I Supply Co.  
PACE ANALYTICAL SERVICES INC  
Parker Print Solutions  
Patriot Construction  
Port Arthur Technical Services  
Port Of Corpus Christi Authori  
Prime Occupational Physicians-Texas, P.A.  
Pro-Surve Technical Services  
PSS Industrial Group Corp  
R B Everett & Co  
Renewable Lubricants Inc  
REPSS INC  
REPUBLIC TESTING LABORATORIES  
RGIS, LLC  
ROLL-LIFT USA, INC  
Rush Truck Centers of Texas LP  
Rush, LLC  
Rutty and Morris LLC  
S.T.A.R. Concrete Pumping  
SABEL STEEL SERVICE INC  
SABINE PASS PORT AUTHORITY  
Schmoyer Reinhard LLP  
Secorp Industries  
Sentry Supply Inc  
Sitech Southeast Texas LLC  
Soutex  
Southeast Texas Parts And Equi  
Southwest Wire Rope LLC  
Specialty Products and Gear LI  
SUMMIT ELECTRIC SUPPLY  
Sun Coast Resources LLC,  
Super Products LLC  
SUPERIOR STEEL INC  
SWCA  
System One Holdings LLC  
TATA AMERICA INTERNATIONAL COR  
TATE & CO COLLISION REPAIR LTD  
TEKNOBUILT LTD

Terracon  
TEXAS FIRE & COMMUNICATIONS IN  
Texas Materials Group, Inc. dba Gulf Coast a  
CRH Company  
THE PAIGE COMPANY CONTAINER IN  
Total Safety  
Tower Medical Center  
Tradesmen International LLC  
Trans Global Solutions, Inc. (TGS)  
TRIANGLE EQUIPMENT II INC  
Triangle Fluid Power Inc  
Trillium Advisory Group Ltd  
TSC Logistics LLC  
Uline Shipping Supply  
United Rentals - Dewatering  
United States Environmental  
Universal Industrial Supply  
Vallen  
Verizon Vendor #64023  
Verizon Wireless Services LLC  
Versa  
Vesta Housing / McGrath Rent / Mobil Modular  
W Supply  
Waskey - Sump Insulation Install  
Watearth  
Western Concrete  
Wholesale Electric Supply  
William Scotsman

**Creditor**

Lodge Lumber Company, Inc.

**Lease Counterparties**

Alba Pipework LLC  
Brenntag Southwest INC  
Briggs Equipment INC  
Canon Financial Services Inc  
ERS RENTAL SOLUTIONS LLC  
Hernandez Office Supply  
Holloway Houston  
JM TEST SYSTEMS LLC  
LONESTAR FORKLIFT 2017 USA INC  
Ludeca Inc  
Ocean View Real Properties, LLC  
PV Rentals Inc  
SCOTT MACON LTD  
SGS North America Inc  
Sourcing Solutions Inc  
SPIDER  
UTILITY TRAILER SALES SE TX IN  
WW Grainger Inc

Yard Mule Specialists Inc  
YUKON SERVICES LLC

**Miscellaneous**

Air Specialty & Equipment Co.  
CRG Financial LLC  
Fircroft Engineering Services aka NES Fircroft  
Engineering Services Limited  
NES Global Limited aka NES Global Hong  
Kong  
Premier Trailer Leasing, Inc.  
Siemens Industry, Inc.  
Suncor Energy (U.S.A.) Inc.  
TRC Master Fund LLC

**Restructuring Professionals (Other)**

Baker Hostetler LLP  
Ice Miller LLP  
King & Spalding, LLP  
Langley & Banack, Inc.  
Lowenstein Sandler LLP

**Schedule 2****Results of Potential Parties in Interest Search**

<b>Name</b>	<b>Category</b>	<b>Open/ Closed</b>
ALERE	Contract Counterparty	Closed
DTN, LLC	Contract Counterparty	Closed
FEDEX CORPORATION	Contract Counterparty	Closed
FEDEX FREIGHT	Contract Counterparty	Closed
Hanes Companies Inc	Contract Counterparty	Open
HARTFORD STEAM BOILER INSP & I	Contract Counterparty	Closed
Johnson Controls	Contract Counterparty	Open
Oracle America Inc	Contract Counterparty	Open
SGS North America Inc	Lease Counterparties	Open
Siemens Industry, Inc.	Miscellaneous	Open
SPIDER	Lease Counterparties	Closed