

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)
	§	
	§	

**STATEMENT OF THE
STATUTORY UNSECURED CLAIMHOLDERS’
COMMITTEE OF ZACHRY HOLDINGS, INC., ET AL., IN
RESPONSE TO THE DEBTORS’ MOTION FOR ENTRY OF AN ORDER
EXTENDING THE EXCLUSIVE PERIODS TO FILE AND SOLICIT A PLAN**

The statutory unsecured claimholders’ committee (the “Committee”) of Zachry Holdings, Inc., *et al.* (the “Debtors”), by and through its undersigned counsel, hereby submits this statement in response to the *Debtors’ Motion for Entry of an Order Extending the Exclusive Periods to File and Solicit a Plan* [Docket No. 933] (the “Motion”). In support of this statement, the Committee respectfully states as follows:

STATEMENT

1. The Committee agrees that substantial progress has been made since the inception of these Chapter 11 cases. Based on statements made by the Debtors’ professionals, the Committee expects the Debtors will file a plan in the near-term that provides for payment in full of all general unsecured claims. As a result, the Committee does not oppose the extension of exclusivity requested in the Motion at this time. However, if no such plan is filed in the near future as

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.



anticipated, the Committee intends to proceed with its investigation into estate assets and potential causes of action to maximize recovery for its constituency.

2. Additionally, based on the Debtors' reports and information provided by the Committee's members, the Committee has expressed concerns to the Debtors that they have not been staying current on post-petition obligations to their vendors. The Debtors have since worked in good faith with the Committee to make significant progress in recent weeks in catching up and remaining current on post-petition payables. The Committee appreciates the Debtors have been proactive in addressing this situation, and will continue to work cooperatively with the Debtors to ensure this positive trend continues.

3. The Committee otherwise does not object to the short extension requested in the Motion.

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Respectfully submitted this 30th day of September, 2024.

GRAY REED

By: /s/ Jason S. Brookner

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*Counsel to the Statutory
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of Zachry Holdings, Inc., et al*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of September, 2024, he caused a true and correct copy of the foregoing document to be served via the Court's CM/ECF system.

/s/ Jason S. Brookner

Jason S. Brookner