IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:) Chapter 11
ZACHRY HOLDINGS, INC., et al. ¹) Case No. 24-90377 (MI)
Debtors.) (Jointly Administered)) Re: Docket Nos. 1029, 1030, 1042

NOTICE OF FILING AMENDED EXHIBIT TO SETTLEMENT AGREEMENT

PLEASE TAKE NOTICE that on September 26, 2024 the above-captioned debtors and debtors in possession (the "Debtors") filed the Debtors' Emergency Motion for Interim and Final Orders (A)(I) Approving the Settlement by and Between Avis Lamotte, on her own Behalf and on Behalf of Others Similarly Situated, and the Debtors, (II) Certifying a Class for Settlement Purposes Only, (III) Appointing the Plaintiff as Class Representative and Plaintiff's Counsel as Class Counsel for Settlement Purposes Only, (IV) Approving the Form and Manner of Service of the Settlement Class Notice, (V) Appointing the Settlement Administrator, and (VI) Scheduling Final Hearing; and (B) Granting Related Relief [Docket Nos. 1029 (sealed), 1030 (redacted)] (the "Motion"). The Motion attached a proposed interim order, which in turn attached a list of putative class members (the "Class Member List"), filed under seal.

PLEASE TAKE FURTHER NOTICE that on September 30, 2024, the Court entered an order authorizing the sealing of the Class Member List, including in subsequent filings [Docket No. 1042].

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. The location of the Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

PLEASE TAKE FURTHER NOTICE that the Class Member List is attached hereto.

The Class Member List now states as follows:

Each putative Class Member listed herein who does not opt-out of the Settlement Class will receive with their Settlement Class Notice their individual estimated recovery under the Settlement (i) prior to any deductions for applicable taxes and withholdings as required by federal, state, and local law and (ii) after any deductions for Service Payments, Class Counsel Fees, and Administration Costs. Exact recoveries remain subject to, among other things, approval of Service Payments and Class Counsel Fees, the number and identity of opt-outs, and the number and amount of unclaimed distributions.

Dated: October 2, 2024 Houston, Texas

/s/ Charles R. Koster

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Counsel to the Debtors and Debtors in Possession

Certificate Of Service

I certify that on October 2, 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