

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

In re:)	
)	Chapter 11
)	
Computer Simulation & Analysis, Inc., ¹)	Case No. 24-90391 (MI)
)	
Reorganized Debtor.)	
)	

**REORGANIZED DEBTORS' OBJECTION
TO AMENDMENT TO PROOF OF CLAIM OF MICHAEL T. COUPEL
(CLAIM NO. 1843)**

This is an objection to your claim. This objection asks the Court to disallow the claim that you filed in this bankruptcy case.

A virtual hearing has been set on this matter on September 29, 2025 at 11:00 a.m. You may attend remotely, or in person.

You may participate in the hearing by an audio and video connection. Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. You will be responsible for your own long-distance charges. Once connected, you will be asked to enter the conference room number. Judge Isgur's conference room number is 954554. You may view video via GoToMeeting. To use GoToMeeting, the Court recommends that you download the free GoToMeeting application. To connect, you should enter the meeting code "JudgeIsgur" in the GoToMeeting app or click the link on Judge Isgur's home page on the Southern District of Texas website. Once connected, click the settings icon in the upper right corner and enter your name under the personal information setting.

The above-captioned reorganized debtors and debtors in possession (the "**Reorganized Debtors**"), file this objection (the "**Objection**") to Claim No. 1843 (the "**Amended Claim**") filed by Michael T. Coupel (the "**Claimant**").² The Amended Claim purports to amend Claimant's original claim – Claim No. 1640 – but it is automatically disallowed under the Plan. However, out

¹ The last four digits of the federal tax identification number for Computer Simulation & Analysis, Inc. are 4097. The location of the Reorganized Debtor's service address in this chapter 11 case is: P.O. Box 240130, San Antonio, Texas 78224. On June 27, 2025, the Bankruptcy Court entered the *Final Decree Closing Certain of the Chapter 11 Cases* (Case No. 24-90377 (MI), Dkt. 3178) closing the chapter 11 cases for Zachry Holdings, Inc., Zachry EPC Holdings, Inc., Zachry Engineering Corporation, ZEC New York, Inc., Zachry High Voltage Solutions, LLC, UE Properties, Inc., ZEC Michigan, Inc., Zachry Constructors, LLC, Zachry Industrial, Inc., Zachry Enterprise Solutions, LLC, Moss Point Properties, LLC, Zachry Nuclear Construction Inc., Zachry Nuclear, Inc., Zachry Nuclear Engineering, Inc., Zachry Plant Services Holdings, Inc., JVIC Fabrication, LLC, Zachry Industrial Americas, Inc., Zachry Maintenance Services, LLC, J.V. Industrial Companies, LLC, Madison Industrial Services Team, LLC.

² A true and correct copy of the Amended Claim is attached hereto as **Exhibit A**.



of an abundance of caution and in view of a hearing set September 29, 2025 on Claimant's original Claim No. 1640, the Reorganized Debtors respectfully object and state as follows:

Relief Requested

1. By this Objection, the Reorganized Debtors seek entry of an order, substantially in the form attached hereto (i) disallowing and expunging the Amended Claim in its entirety and (ii) granting such other and further relief as the Court deems just and proper.

Jurisdiction, Venue, and Predicates for Relief

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding under 28 U.S.C. § 157(b)(2)(B) and this Court has constitutional authority to enter a final order because the matter involves allowance or disallowance of claims against the estate.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The predicates for the relief requested herein are sections 105(a) and 502(b) of title 11 of the United States Code, rule 3007 of the Federal Rules of Bankruptcy Procedure, and rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas.

Procedural and Factual Background

A. Bar Date Order and Confirmation of the Plan

5. On July 26, 2024, the Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, (IV) Approving Notice of Bar Dates, and (V) Granting Related Relief* (the “**Bar Date Order**”). Case No. 24-90377, Dkt. 636. The Bar Date Order established September 16, 2024, at 5:00 p.m. (prevailing Central Time) as the deadline for all non-governmental entities holding or wishing to assert a “claim” (as defined

in section 101(5) of the Bankruptcy Code) against any of the Reorganized Debtors that arose before the Petition Date to file proof of such claim.

6. On February 26, 2025, the Bankruptcy Court held a combined hearing on final approval of the Disclosure Statement³ and confirmation of the Plan.⁴ The Court entered the order approving the Disclosure Statement and confirming the Plan on February 27, 2025.⁵ The Effective Date occurred on April 10, 2025. Case No. 24-90377, Dkt. 2731.

7. Article VII.G of the Plan, entitled “Amendments to Proofs of Claim,” provides the following:

On or after the Effective Date, except as provided in the Plan or the Confirmation Order, a Claim or Proof of Claim may not be Filed or amended without the prior authorization of the Bankruptcy Court or the Reorganized Debtors, and any such new or amended Claim or Proof of Claim Filed after the Effective Date shall be deemed Disallowed in full and expunged without any further action or notice to the Bankruptcy Court; provided, however, the filing of an unauthorized amendment shall not affect the underlying Claim or Proof of Claim. Nothing in this paragraph shall impair any claimant’s ability to seek leave from the Bankruptcy Court to amend a Claim or Proof of Claim.

Case No. 24-90377, Dkt. 2362 (emphasis added).

B. The Claim, Investigation, Objections, and Amendments

8. On October 5, 2024, the Claimant filed Proof of Claim No. 1640 against Zachry Industrial, Inc. *See* Dkt. 139-2, *Reorganized Debtors’ Amended Objection to Proof of Claim of Michael T. Coupel (Claim No. 1640)*.⁶

³ The “**Disclosure Statement**” refers to the Disclosure Statement for the Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates, Case No. 24-90377, Dkt. 1986.

⁴ The “**Plan**” refers to the Further Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates. Case No. 24-90377, Dkt. 2362.

⁵ Findings of Fact, Conclusions of Law, and Order (I) Approving the Debtors’ Disclosure Statement on a Final Basis and (II) Confirming the Further Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates. Case No. 24-90377, Dkt. 2431.

⁶ Claimant also asserted a separate proof of claim, Claim No. 695, which has been considered and disallowed by the Court. *See* Case No. 24-90377, Dkt. 2261 (Debtors’ Objection to Claim Number 695) and 3058 (Order Disallowing Claim).

9. The Reorganized Debtors attempted to contact Claimant multiple times to investigate Claim No. 1640. On November 26, 2024, and December 3, 2024, DRP personnel called Claimant and left voicemail messages. On November 27, 2024, DRP personnel both called Claimant and left a voicemail message and sent Claimant an email asking for Claimant to contact DRP. Claimant did not respond. Dkt. 139 at ¶ 21.

10. On February 17, 2025, Reorganized Debtors filed an *Objection to Proof of Claim of Michael T. Coupel*. Case No. 24-90377, Dkt. 2272. The Claimant did not file a response.

11. The Court set the Claim for a hearing on July 7, 2025, at which time the Court required the Reorganized Debtors to file an amended objection to the Claim, among others. *See* Case No. 24-90377, Dkt. 3215 (Courtroom Minutes). Claimant did not appear at the July 7 hearing.

12. On July 20, 2025, the Claimant filed the Amended Claim, Proof of Claim No. 1843, against Zachry Industrial, Inc. The Amended Claim changes the basis for the Claim and adds over \$110,000.00 to the amount of the Claim. **Exhibit A**.

13. On August 6, 2025, the Reorganized Debtors filed *Reorganized Debtors' Amended Objection to Proof of Claim of Michael T. Coupel (Claim No. 1640)* the (“**Amended Objection**”). Dkt. 139.

14. On September 8, 2025, the Court held a hearing on the Amended Objection. Claimant made his first appearance at this hearing.⁷ The Court set a new hearing on the Amended Objection for September 29, 2025 at 11:00 a.m. *See* Dkt. 203 (Courtroom Minutes).

Objection

15. The Court should order that the Amended Claim is disallowed.

⁷ Claimant's wife, Rachel Coupel, appeared for Claimant.

16. First, the Amended Claim is automatically disallowed under Article VII.G of the Plan. The Amended Claim was filed on July 20, 2025, which is after the Effective Date of April 10, 2025. The Claim was filed without the prior authorization of the Court or the Reorganized Debtors. The Claimant did not seek leave to file the Amended Claim. As a result, the Amended Claim “shall be deemed Disallowed in full and expunged without any further action or notice to the Bankruptcy Court.” *See* Case No. 24-90377, Dkt. 2362 at Art. VII.G.

17. Second, while the Claimant has not sought leave to amend, the Court should deny any such request, if made, due to equitable factors. These factors include “undue delay” and “undue prejudice to the opposing party by virtue of allowance of the amendment.” *In re DePugh*, 409 B.R. 84, 100 (Bankr. S.D. Tex. 2009) (Bohm, J.). The Court may deny leave to amend if it finds that “any *one* of these factors is present.” *Id.* (emphasis in original).

18. Here, there is undue delay in the Claimant’s effort to amend that causes undue prejudice to the Reorganized Debtors. The Claimant filed two proofs of claim in October 2024. The Reorganized Debtors attempted to contact the Claimant to investigate his claims on multiple occasions, but Claimant did not respond. *See* Dkt. 139, at ¶ 21 (detailing multiple telephone calls and email attempts). The Reorganized Debtors objected to each claim on February 17, 2025. Case No. 24-90377, Dkts. 2261, 2272. Claimant did not file a response to either objection. The Court disallowed Claim No. 695 (asserted for \$30,153.00) on June 13, 2025. Case No. 24-90377, Dkts. 2261, 3058. Claimant did not appear at the hearing on July 7, 2025 pertaining to Claim No. 1640. Shortly thereafter, long after the Bar Date and the Effective Date, and without seeking leave, Claimant filed the instant Claim, which seeks to amend Claim 1640 to add over \$110,000.00 and adds additional factual allegations. **Exhibit A.**

19. Although the factual basis for the Claim is still vague, it is different from the basis that the Reorganized Debtors have focused their investigation on for months. *Id.* (newly alleging “unfair treatment or unjust disciplinary act”). Claimant purports to amend his claim after many months, and after having failed to respond to filings or appear at a hearing. Only now has Claimant alleged that his claim is related to an allegedly unjust disciplinary act. The Reorganized Debtors have relied on the amount of alleged debt and the basis stated in the original claim in connection with the investigation and filing of two objections to Proof of Claim No. 1640. To respond, the Reorganized Debtors will have to renew their investigation, this time seeking to identify a different amount owed and potentially seeking different categories of documents or witnesses to investigate the specific allegations of an unjust disciplinary act. Claimant has unduly delayed in filing an Amended Claim and this delay is prejudicial to the Reorganized Debtors.

20. For these reasons, the Reorganized Debtors respectfully object to the Amended Claim.

Reservation of Rights

This Objection is limited to the grounds identified therein. The Reorganized Debtors expressly reserve all further substantive or procedural objections. Nothing contained herein or any actions taken pursuant to such relief requested is intended or shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against a Reorganized Debtor entity under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Reorganized Debtors’ or any other party in interest’s rights to dispute any claim on any grounds; (c) a promise or requirement to pay any claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection or a finding that any particular claim is an administrative expense claim or other priority

claim; (e) a waiver of any claims or causes of action which may exist against any creditor or interest holder; (f) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (g) a waiver or limitation of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law; (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance of property of the Reorganized Debtors' estates; or (i) a concession by the Reorganized Debtors that any liens (contractual, common law, statutory, or otherwise) that may be satisfied pursuant to the relief requested in this Objection are valid and the rights of all parties in interest are expressly reserved to contest the extent, validity, or perfection or seek avoidance of all such liens.

Notice

The Reorganized Debtors will provide notice of this Motion to: (a) the United States Trustee for the Southern District of Texas; (b) counsel for the Committee; (c) the Prepetition Agent; (d) the United States Attorney's Office for the Southern District of Texas; (e) the state attorneys general for the states in which the Reorganized Debtors operate; (f) the Internal Revenue Service; and (g) any party that has requested notice pursuant to Bankruptcy Rule 2002 and Bankruptcy Local Rule 9013-1(d). In light of the nature of the relief requested, no other or further notice need be provided.

Conclusion

For the foregoing reasons, the Reorganized Debtors respectfully request that the Court enter the Proposed Order (i) disallowing the Claim, and (ii) granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ D. Ryan Cordell, Jr.

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Hicks Thomas LLP

700 Louisiana Street, Suite 2300

Houston, Texas 77002

Telephone: (713) 547-9100

Facsimile: (713) 547-9150

Counsel for Reorganized Debtors

Certificate of Service

I certify that on September 12, 2025 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/ D. Ryan Cordell, Jr.

D. Ryan Cordell, Jr.

Fill in this information to identify the case:

Debtor Zachry Industrial, Inc.

United States Bankruptcy Court for the: Southern District of Texas
(State)

Case number 24-90385

EXHIBIT**A****Official Form 410
Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

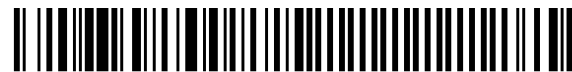
Part 1: Identify the Claim

1. Who is the current creditor?	<u>MICHAEL T COUPEL</u> Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor <u>employee ID 2126890146</u>	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? MICHAEL T COUPEL 569 Saint Ann Street RACELAND, LA 70394, United States Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) Contact phone <u>985-438-6622</u> Contact email <u>coupelrm79@outlook.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) Contact phone _____ Contact email _____
4. Does this claim amend one already filed?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Claim number on court claims registry (if known) <u>1640</u> Filed on <u>10-05-2024</u> MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Who made the earlier filing? <u>MICHAEL T COUPEL</u>	



Part 2: Give Information About the Claim as of the Date the Case Was Filed

6.	Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: <u>0385</u>	
7.	How much is the claim? \$ <u>126248.72</u>	Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).	
8.	What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <u>Unfair treatment or unjust disciplinary act</u>		
9.	Is all or part of the claim secured? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. <div style="margin-left: 40px;"> Nature or property: <input type="checkbox"/> Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i>. <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ </div> <div style="margin-left: 40px; margin-top: 20px;"> Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) </div> <div style="margin-left: 40px; margin-top: 20px;"> Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.) </div> <div style="margin-left: 40px; margin-top: 20px;"> Amount necessary to cure any default as of the date of the petition: \$ _____ </div> <div style="margin-left: 40px; margin-top: 20px;"> Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable </div>		
10.	Is this claim based on a lease? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____		
11.	Is this claim subject to a right of setoff? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____		



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ No☒ Yes. Check all that apply:

Amount entitled to priority

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____☒ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ 126248.72☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies. \$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. 503(b)(9)?

☒ No☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ _____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☒ I am the creditor.☐ I am the creditor's attorney or authorized agent.☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 07/20/2025
MM / DD / YYYY

/s/MICHAEL T COUPEL
Signature

Print the name of the person who is completing and signing this claim:

Name MICHAEL T COUPEL
First name Middle name Last name

Title _____

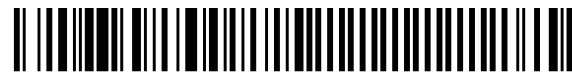
Company _____

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____

Contact phone _____

Email _____



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

In re:)	
)	Chapter 11
)	
Computer Simulation & Analysis, Inc., ¹)	Case No. 24-90391 (MI)
)	
Reorganized Debtor.)	
)	

**ORDER SUSTAINING
THE REORGANIZED DEBTORS' OBJECTION
TO AMENDED PROOF OF CLAIM OF MICHAEL T. COUPEL (CLAIM NO. 1843)**

Upon the objection (the “**Objection**”)² of the above-captioned reorganized debtors and debtors in possession (collectively, the “**Reorganized Debtors**”) for entry of an order (this “**Order**”) disallowing the Proof of Claim No. 1843 (the “**Amended Claim**”), as more fully set forth in the Objection; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and that this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the Reorganized Debtors’

¹ The last four digits of the federal tax identification number for Computer Simulation & Analysis, Inc. are 4097. The location of the Reorganized Debtor’s service address in this chapter 11 case is: P.O. Box 240130, San Antonio, Texas 78224. On June 27, 2025, the Bankruptcy Court entered the *Final Decree Closing Certain of the Chapter 11 Cases* (Case No. 24-90377 (MI), Docket No. 3178) closing the chapter 11 cases for Zachry Holdings, Inc., Zachry EPC Holdings, Inc., Zachry Engineering Corporation, ZEC New York, Inc., Zachry High Voltage Solutions, LLC, UE Properties, Inc., ZEC Michigan, Inc., Zachry Constructors, LLC, Zachry Industrial, Inc., Zachry Enterprise Solutions, LLC, Moss Point Properties, LLC, Zachry Nuclear Construction Inc., Zachry Nuclear, Inc., Zachry Nuclear Engineering, Inc., Zachry Plant Services Holdings, Inc., JVIC Fabrication, LLC, Zachry Industrial Americas, Inc., Zachry Maintenance Services, LLC, J.V. Industrial Companies, LLC, Madison Industrial Services Team, LLC.

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

estates, their creditors, and other parties in interest; and this Court having found that the Reorganized Debtors' notice of the Objection and opportunity for a hearing on the Objection were appropriate and no other notice need be provided; and this Court having reviewed the Objection and having heard the statements in support of the relief requested therein at a hearing before this Court, if any (the "**Hearing**"); and this Court having determined that the legal and factual bases set forth in the Objection and at the Hearing, if applicable, establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Amended Claim is hereby disallowed in its entirety.
2. Kurtzman Carson Consultants, LLC (doing business as Verita Global), as claims, noticing and solicitation agent, is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.
3. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order or the Objection shall be deemed: (a) an admission as to the amount of, basis for, or validity of any claim against a Reorganized Debtor entity under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Reorganized Debtors' or any other party in interest's rights to dispute any claim on any grounds; (c) a promise or requirement to pay any claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection or a finding that any particular claim is an administrative expense claim or other priority claim; (e) a waiver of any claims or causes of action which may exist against any creditor or interest holder; (f) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (g) a waiver or limitation of the Reorganized Debtors' or

any other party in interest's rights under the Bankruptcy Code or any other applicable law; (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance of property of the Reorganized Debtors' estates; or (i) a concession by the Reorganized Debtors that any liens (contractual, common law, statutory, or otherwise) that may be satisfied pursuant to the relief requested in this Objection are valid and the rights of all parties in interest are expressly reserved to contest the extent, validity, or perfection or seek avoidance of all such liens.

4. The Reorganized Debtors are authorized, but not directed, to execute and deliver such documents and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

5. Notice of the Objection as provided therein shall be deemed good and sufficient notice of such Objection and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

6. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

7. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.

Houston, Texas

Dated: _____, 2025

THE HON. MARVIN P. ISGUR
UNITED STATES BANKRUPTCY JUDGE