

**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.)	
)	Re: D.I. 1404, 1795, 2779

**NOTICE OF STIPULATION REGARDING THE
CLAIMS OF NOOTER/ERIKSEN, INC**

This notice of stipulation (the “**Notice of Stipulation**”) is made by and among Nooter/Eriksen, Inc. (“**N/E**”) and Zachry Holdings, Inc. and its affiliated reorganized debtors (the “**Reorganized Debtors**” and, together with N/E, the “**Parties**” and each a “**Party**”). The Parties hereby stipulate and agree as follows:

WHEREAS, on May 21, 2024, the Reorganized Debtors commenced these chapter 11 cases (the “**Chapter 11 Cases**”) in the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”);

WHEREAS, on September 12, 2024, N/E filed a proof of claim in the Chapter 11 Cases (Claim No. 1429) against the Debtor Zachry Industrial, Inc. in the amount of \$8,718,466.44 (the “**N/E Claim**”);

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.



WHEREAS, the N/E Claim is based upon Purchase Order GPX-USSP-CBE-27-MX-948-X26-0001-A-00, as modified and supplemented, issued to N/E by CCZJV-GPX (the “**Purchase Order**”) with a total contract value of \$74,198,906.36 related to Golden Pass LNG Export Terminal Project;

WHEREAS, on November 13, 2024, the Debtors filed their *Thirteenth Omnibus Objection to Certain Proofs of Claim* and objected to the N/E Claim. *See* Docket No. 1404 (solely as it relates to the N/E Claim, the “**Claim Objection**”);

WHEREAS, on December 30, 2024, N/E filed its *Response to the Claim Objection*. *See* Docket No. 1795;

WHEREAS, on or about January 21, 2025, CCZJV-GPX and N/E entered into Purchase Order Supplement No. 39 (the “**Supplemental Purchase Order**”);

WHEREAS, on April 21, 2025, the Court approved the Parties’ agreement to abate the N/E Claim Objection to August 1, 2025, to allow the Parties to continue performance of the remaining obligations related to the Purchase Order and Supplemental Purchase Order and resolution of any payment obligations related to the N/E Claim in the ordinary course of business and consistent with the terms of the Purchase Order, Supplement Purchase Order, Plan,² and GPX Settlement (as defined in the Plan). *See* Docket No. 2779; and

WHEREAS, the Parties have reached an agreement with respect to the N/E Claim and the Claim Objection, and have agreed to the treatment of the N/E Claim on the terms and conditions set forth in this Notice of Stipulation.

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND ORDERED:

² The *Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and its Debtor Affiliates* [Docket No. 1978] (as altered, amended, supplemented, or otherwise modified from time to time).

1. The N/E Claim has been satisfied and is resolved pursuant to the GPX Settlement (as defined in the Plan) and Article VII.A of the Plan.

2. The N/E Claim is withdrawn.

3. The Claim Objection is withdrawn.

4. Kurtzman Carson Consultants, LLC (dba 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 Notice of Stipulation.

STIPULATED AND AGREED THIS 17TH DAY OF NOVEMBER 2025:

/s/ Charles R. Koster

WHITE & CASE LLP

Charles R. Koster (Texas Bar No. 24128278)
609 Main Street, Suite 2900
Houston, Texas 77002
Telephone: (713) 496-9700
Facsimile: (713) 496-9701
Email: charles.koster@whitecase.com

-and-

WHITE & CASE LLP

Bojan Guzina (admitted *pro hac vice*)
Andrew F. O'Neill (admitted *pro hac vice*)
Fan B. He (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, Illinois 60606
Telephone: (312) 881-5400
Email: bojan.guzina@whitecase.com
aoneill@whitecase.com
fhe@whitecase.com

Counsel to the Reorganized Debtors

/s/ T. Josh Judd

ANDREWS MYERS, P.C.

T. Josh Judd
SBN: 24036866
1885 Saint James Place, 15th Floor
Houston, TX 77056
Tel: 713-850-4200
Fax: 713-850-4211
jjudd@andrewsmyers.com

Counsel for Nooter/Eriksen, Inc.

Certificate of Service

I certify that on November 17, 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/ Charles R. Koster
Charles R. Koster