

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

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In re:	)	
	)	Chapter 11
	)	
ZACHRY HOLDINGS, INC., <i>et al.</i> <sup>1</sup>	)	Case No. 24-90377 (MI)
	)	
Debtors.	)	(Jointly Administered)

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DEBTORS' OBJECTION  
TO PROOF OF CLAIM OF DARRALL WAYNE TAYLOR

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This is an objection to your claim. This objection asks the Court to disallow the claim that you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) file this objection (the “**Objection**”) to Claim No. 1133 (the “**Claim**”) filed by Darrall Wayne Taylor (the “**Claimant**”). In support of this Objection, the Debtors submit the Declaration of William Murphy attached hereto as **Exhibit A**. In further support of this Objection, the Debtors respectfully state as follows:

**Preliminary Statement Regarding Frivolous and Unsupported Claims**

1. The Claim is one of a group of claims filed by Debtors’ current and former employees on unknown or ambiguous grounds. These claims include either no information and/or did not attach any documentation in support. The Debtors have reviewed each of these claims, including the Claim, and determined that these claims are invalid or without support or are unable to determine the validity of the claims without more information. The Debtors have attempted to

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<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.veritaglobal.net/ZHI](http://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.



contact the Claimants to gather more information about these Claims, but these attempts have been unsuccessful.

### **Relief Requested**

2. By this Objection, the Debtors seek entry of an order, substantially in the form attached hereto (the “**Proposed Order**”) (i) disallowing and expunging the 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**

3. The United States Bankruptcy Court for the Southern District of Texas (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.

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

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

### **Background**

#### **A. The Chapter 11 Cases**

6. On May 21, 2024 (the “**Petition Date**”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned chapter 11 cases. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. These chapter 11 cases are being jointly administered pursuant to Bankruptcy Rule 1015(b). No party has requested the appointment of a trustee or examiner in these chapter 11 cases. On June 4, 2024, the Office of

the United States Trustee for the Southern District of Texas (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the “**Committee**”) [Docket No. 176].

7. A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to these chapter 11 cases, is set forth in the *Declaration of Mohsin Y. Meghji in Support of Debtors’ Petitions and Requests for First Day Relief* [Docket No. 7].

8. On July 16, 2024, the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs (collectively, the “**Schedules and Statements**”) *See* Docket Nos. 510–531. On August 30, 2024 and December 2, 2024, several of the Debtors filed amendments to their Schedules and Statements. *See* Docket Nos. 855-865, 1564.

9. 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* [Docket No. 636] (the “**Bar Date Order**”). 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 Debtors that arose before the Petition Date to file proof of such claim (the “**General Bar Date**”). The bar date for claims related to the amended Schedules and Statements was October 4, 2024, at 5:00 p.m. (prevailing Central Time), and for filing proofs of claim related to the second amended Schedules and Statements is January 2, 2025, at 5:00 p.m. (prevailing Central Time). The deadline for all governmental entities holding or wishing to assert a claim against any of the Debtors that arose prior to the Petition Date to file

proof of such claim was November 18, 2024, at 5:00 p.m. (prevailing Central Time) (the “**Governmental Bar Date**”).

**B. The Claim**

10. On August 31, 2024, the Claimant filed the Claim as a 507(a)(7), (4), (8), and (5) claim against Zachry Holdings, Inc. A true and correct copy of the Claim is attached hereto as **Exhibit B**.

11. Claimant seeks \$20,320.00. The alleged basis for the claim is “rental lease, loss of wages, taxes on unemployment.”

12. Claimant has provided no information or documentation to demonstrate a ground for payment of the Claim. See **Exhibit A**.

13. The Debtors, their advisors, and/or counsel (collectively, the “Reviewing Parties”) have been working diligently to review the Claim, including any supporting documentation.

14. Based on the Reviewing Parties’ analysis to date, the Reviewing Parties believe that the Claim should be disallowed as set forth herein.

**Objection**

15. Section 502(a) of the Bankruptcy Code provides, in pertinent part, that “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Further, section 502(b)(1) of the Bankruptcy Code provides that a court “shall determine the amount of such claim . . . as of the date of the filing of the petition, and shall allow such claim in such amount, except to the extent that—such claim is unenforceable against the debtor and the property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). This statutory exception to the allowance of a claim is “generally complemented by § 558, which provides that ‘[t]he estate shall have the benefit of any defense available to the debtor as against any entity other than the estate, including

statutes of limitation, statutes of fraud, usury, and other personal defenses.” *In re W.R. Grace & Co.*, 626 B.R. 217, 235 (Bankr. D. Del. 2021) (quoting 11 U.S.C. § 558).

16. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). However, a proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that is essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *See id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Revenue*, 530 U.S. 15 (2000)).

17. Here, the Claim should be disallowed in its entirety. As set forth in Exhibit A, the Debtors have thoroughly reviewed their books and records and the Claim, and cannot determine the validity of the claim. The Claimant did not include any supporting documentation and only stated “rental lease, loss of wages, taxes on unemployment” as the basis for the claim. The Debtor contacted the Claimant on November 26, 2024, requesting additional information to support the Claim. Claimant stated he understood that Debtors are not responsible for his personal expenses, but refused to withdraw the Claim. As such, the Claim should be disallowed. The failure to disallow the Claim could result in the Claimant receiving an unwarranted recovery against the Debtors’ estates to the detriment of creditors with valid claims.

18. The Debtors request that the Court enter an order disallowing the Claim subject to the Claimant providing the Debtors with supporting documentation as set forth above.

**Reservation of Rights**

This Objection is limited to the grounds identified therein. The 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 Debtor entity under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the 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 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 Debtors' estates; or (i) a concession by the 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 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 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 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.

John B. Thomas (Attorney-in-Charge)

Texas Bar No. 19856150

S.D. Tex. ID No. 10675

jthomas@hicks-thomas.com

D. Ryan Cordell, Jr.

Texas Bar No. 24109754

S.D. Tex. ID No. 3455818

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mjantz@hicks-thomas.com

Hicks Thomas LLP

700 Louisiana Street, Suite 2300

Houston, Texas 77002

Telephone: (713) 547-9100

Facsimile: (713) 547-9150

*Counsel for Debtors*

**Certificate of Service**

I certify that on February 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/ D. Ryan Cordell, Jr.  
D. Ryan Cordell, Jr.



**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)
	)	

**DECLARATION OF WILLIAM B. MURPHY  
IN SUPPORT OF DEBTORS' OBJECTION TO  
PROOF OF CLAIM NO. 1133**

I, William B. Murphy, solely in my capacity as financial advisor to the above-captioned debtors and debtors in possession (the “**Debtors**”), declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a Senior Director at M3 Advisory Partners, LP (“**M3**”). Inclusive of my time at M3, I have over 40 years of experience in corporate restructuring, including advising creditors and debtors on strategic planning, financial projections, claim reconciliation, claim resolution and debt restructuring. In connection with chapter 11 restructurings, I possess considerable familiarity with and experience in, among other things, analyzing and monitoring cash management systems, debt classification and priority, bankruptcy taxation, preference actions, fraudulent conveyance actions, feasibility issues, disclosure statement and plan of reorganization approval procedures and hearings, and negotiations between debtors and their creditors.

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<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’ proposed claims and noticing agent at [www.veritaglobal.net/ZHI](http://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.

**EXHIBIT**

**A**

2. I am generally familiar with the Debtors' day-to-day operations, financing, arrangements, business affairs, and accounting software that reflects, among other things, the Debtors' liabilities.

3. Contemporaneously with the filing of this Declaration, the Debtors filed the *Objection to Proof of Claim No. 1133* (the "**Objection**").<sup>2</sup>

4. The facts set forth in this Declaration are based upon my personal knowledge, personal conversations I have had with the Debtors' management and financial advisors, or upon my review of records kept in the ordinary course of the Debtors' business that were, as appropriate, reviewed by me or others under my supervision and direction. Further, I or others under my supervision and direction have reviewed and analyzed, to the extent possible, the proofs of claim filed by claimants, including the present Claim. If called and sworn as a witness, I could and would testify competently to the matters set forth herein.

### **THE CLAIM**

5. I have read the Objection and, to the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. The Debtor contacted the Claimant on November 26, 2024, requesting additional information to support the Claim. Claimant stated he understood that Debtors are not responsible for his personal expenses but refused to withdraw the Claim.

6. The Debtors and their advisors have determined that they cannot reconcile the present Claim with the Debtors' books and records because the Claim does not include sufficient information or documentation to support a claim against the Debtors. Without providing such information or documentation, the Debtors are unable to ascertain the validity of the Claim. As

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

such, I believe that the failure to provide such supporting documentation within 30 days from the date the Objection Notice is served on such claimholders should result in the disallowance and expunging of the Claim. I believe that the failure to disallow and expunge the Claim at that point could result in the applicable claimant receiving an unwarranted recovery against the Debtors' estates to the detriment of creditors with valid claims. As such, I believe that the disallowance of the Claim on the terms set forth in the Objection is appropriate.

Dated: February 17, 2025

By: /s/ William B. Murphy

William B. Murphy

M3 Advisory Partners LP

## Fill in this information to identify the case:

Debtor Zachry Holdings, Inc.

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

Case number 24-90377

## 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>Darrall Wayne Taylor</u> Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor _____	
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? See summary page	Where should payments to the creditor be sent? (if different)
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Contact phone <u>4798779745</u> Contact email <u>dwtaylor@sr@yahoo.com</u>	Contact phone _____ Contact email _____
	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**EXHIBIT**  
**B**

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

6.	<b>Do you have any number you use to identify the debtor?</b>	<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>0377</u>
7.	<b>How much is the claim?</b> \$ <u>19060.00</u>	<b>Does this amount include interest or other charges?</b> <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.	<b>What is the basis of the claim?</b> 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>rental lease, loss of wages, taxes on unemployment</u>	
9.	<b>Is all or part of the claim secured?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. <div style="margin-left: 40px;"> <b>Nature or property:</b>   <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;"> <b>Basis for perfection:</b> _____          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;"> <b>Value of property:</b> \$ _____  <b>Amount of the claim that is secured:</b> \$ _____  <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)         </div> <div style="margin-left: 40px; margin-top: 20px;"> <b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____         </div> <div style="margin-left: 40px; margin-top: 20px;"> <b>Annual Interest Rate</b> (when case was filed) _____ %  <input type="checkbox"/> Fixed  <input type="checkbox"/> Variable         </div>	
10.	<b>Is this claim based on a lease?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <b>Amount necessary to cure any default as of the date of the petition.</b> \$ _____	
11.	<b>Is this claim subject to a right of setoff?</b> <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)?

☐ No☒ Yes. Check all that apply:

## Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the 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).\$ 3,350☒ 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).\$ 15,150☒ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).\$ 1,500☒ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).\$ 320☐ 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 08/31/2024

MM / DD / YYYY

/s/Darrell Taylor

Signature

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

Name Darrell Taylor

First name

Middle name

Last name

Title Safety FacilitatorCompany Zachry Holding INC

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

Address \_\_\_\_\_

Contact phone \_\_\_\_\_

Email \_\_\_\_\_



For phone assistance: Domestic (866) 479-8211 | International (781) 575-2037

<b>Debtor:</b> 24-90377 - Zachry Holdings, Inc.		
<b>District:</b> Southern District of Texas, Houston Division		
<b>Creditor:</b> Darrall Wayne Taylor Darrall Wayne Taylor 1141 Chesterfield dr.  Webb City, Missouri, 64870 United States <b>Phone:</b> 4798779745 <b>Phone 2:</b>  <b>Fax:</b>  <b>Email:</b> dwtaylor@yaho.com	<b>Has Supporting Documentation:</b> Yes, supporting documentation successfully uploaded <b>Related Document Statement:</b>	
	<b>Has Related Claim:</b> No <b>Related Claim Filed By:</b>	
	<b>Filing Party:</b> Creditor	
	<b>Other Names Used with Debtor:</b>	
<b>Amends Claim:</b> No <b>Acquired Claim:</b> No		
<b>Basis of Claim:</b> rental lease, loss of wages, taxes on unemployment	<b>Last 4 Digits:</b> Yes - 0377	<b>Uniform Claim Identifier:</b>
<b>Total Amount of Claim:</b> 19060.00	<b>Includes Interest or Charges:</b> No	
<b>Has Priority Claim:</b> Yes	<b>Priority Under:</b> 11 U.S.C. §507(a)(4): 15,150 11 U.S.C. §507(a)(5): 320 11 U.S.C. §507(a)(7): 3,350 11 U.S.C. §507(a)(8): 1,500	
<b>Has Secured Claim:</b> No <b>Amount of 503(b)(9):</b> No <b>Based on Lease:</b> No <b>Subject to Right of Setoff:</b> No	<b>Nature of Secured Amount:</b> <b>Value of Property:</b> <b>Annual Interest Rate:</b> <b>Arrearage Amount:</b> <b>Basis for Perfection:</b> <b>Amount Unsecured:</b>	
<b>Submitted By:</b> Darrall Taylor on 31-Aug-2024 8:08:11 p.m. Eastern Time <b>Title:</b> Safety Facilitator <b>Company:</b> Zachry Holding INC		





Name:	Company:	Employee Id:	Job #:
TAYLOR, DARRALL	HB01	4125947275	112280

**Payment Details (Pay Date: 04/18/2024 | Check Number: 99001504 )**

Name:	Company:	Period Start:	Period End:	Job #:
TAYLOR, DARRALL	HB01	04/08/2024	04/14/2024	112280
Issued By: ZACHRY INDUSTRIAL, INC (FLD) P.O. BOX 240130 SAN ANTONIO TX 78224 USA				

**Earnings:**

Description	Rate	Current Hours	Current Amount	YTD Amount
REGULAR PAY	34.0000	40.00	\$1,360.00	\$20,502.00
TIME AND 1/2	51.0000	10.00	\$510.00	\$12,393.00
TAXABLE GTL			\$6.16	\$98.56
BUSTRANOTWORKD	34.0000	2.50	\$85.00	\$1,292.00
VAC SALARY/CLER				\$1,921.00
PERS/SAL/CLER				\$578.00
PER DIEM-TAXABL			\$700.00	\$10,000.00
<b>TOTAL PAY</b>			<b>\$2,661.16</b>	<b>\$46,784.56</b>

**Taxes:**

Description	Current	Year To Date
FICA-OASDI	\$156.58	\$2,766.02
FEDERAL W/H TAX M-00	\$289.71	\$4,989.39
FICA-HI	\$36.62	\$646.89

**Deductions:**

Description	Current	Year To Date
TAXABLE GTL	\$6.16	\$98.56
PPO STANDARD *	\$117.34	\$1,877.44
ENHANCED DENTAL *	\$15.39	\$246.24
HOSP INDEMNITY	\$8.34	\$133.44
ACCIDENT PLAN	\$3.77	\$60.32
GROUP VISION *	\$2.98	\$47.68
CRITICAL ILLNSS	\$16.58	\$265.28
SAFETY NET	\$3.45	\$55.20
401(K) EMPLOYEE*	\$58.65	\$2,363.37
NET PAY	\$1,945.59	\$33,234.73

**Memos:**

Descriptions	Current Amount	YTD Amount
PPO STANDARD CO	\$199.84	\$3,197.44
Dental - Enhanced Plan - Company Contribution	\$3.27	\$52.32
401K COMPANY MATCH - PRIOR PAY PERIOD	\$42.33	\$1,515.47



Accrual Balances	
Accrual Type	Accrual Amount
VACATION HOURS ACCRUED	37.44
VACATION ACCRUAL PER WEEK	1.54
VACATION HOURS ACCRUAL LIMIT	160.00



# Apartment Lease Contract

This is a binding contract. Read carefully before signing.

This Lease Contract ("Lease") is between you, the resident(s) as listed below and us. The terms "you" and "your" refer to all residents. The terms "we," "us," and "our" refer to the owner listed below.

## PARTIES

Residents Ross Taylor, Darrall Taylor

Owner Stonemleigh on Major LLC

Occupants Above listed only

## LEASE DETAILS

### A. Apartment (Par. 2)

Street Address: 4550 North Major #922

Apartment No. 922 City: Beaumont State: TX Zip: 77713

### B. Initial Lease Term. Begins:

01/10/2024

Ends at 11:59 p.m. on:

02/28/2025

### C. Monthly Base Rent (Par. 3)

\$ 1105.00

### E. Security Deposit (Par. 5)

\$ 250.00

### F. Notice of Termination or Intent to Move Out (Par. 4)

A minimum of 60 days' written notice of termination or intent to move out required at end of initial Lease term or during renewal period.

If the number of days isn't filled in, notice of at least 30 days is required.

### D. Prorated Rent

\$ 71.00

☒ due for the remainder of 1st month or  
☐ for 2nd month

Note that this amount does not include any Animal Deposit, which would be reflected in an Animal Addendum.

### G. Late Fees (Par. 3.3)

#### Initial Late Fee

☒ 5 % of one month's monthly base rent or

☐ \$ \_\_\_\_\_

#### Daily Late Fee

☒ 1 % of one month's monthly base rent for 5 days or

☐ \$ \_\_\_\_\_ for \_\_\_\_\_ days

Due if rent unpaid by 11:59 p.m. on the 3rd (3rd or greater) day of the month

### H. Returned Check or Rejected Payment Fee (Par. 3.4)

\$ 50.00

### J. Early Termination Fee Option (Par. 7.2)

\$ 2000.00

Notice of 60 days is required.

You are not eligible for early termination if you are in default.

Fee must be paid no later than 10 days after you give us notice.

If any values or number of days are blank or "0," then this section does not apply.

### K. Violation Charges

#### Animal Violation (Par. 12.2)

Initial charge of \$ 100.00 per animal (not to exceed \$100 per animal) and

A daily charge of \$ 10.00 per animal (not to exceed \$10 per day per animal)

Insurance Violation (Master Lease Addendum or other separate addendum)

\$ \_\_\_\_\_

### I. Relletting Charge (Par. 7.1)

A relletting charge of \$ 939.25 (not to exceed 85% of the highest monthly rent during the Lease term) may be charged in certain default situations.

### L. Additional Rent - Monthly Recurring Fixed Charges. You will pay separately for these items as outlined below and/or in separate addenda, Special Provisions or an amendment to this Lease.

Animal rent \$ 30.00 Cable/satellite \$ \_\_\_\_\_ Internet \$ \_\_\_\_\_

Package service \$ \_\_\_\_\_ Pest control \$ \_\_\_\_\_ Stormwater/drainage \$ \_\_\_\_\_

Trash service \$ 25.00 Washer/Dryer \$ \_\_\_\_\_

Other: \_\_\_\_\_ \$ \_\_\_\_\_

Other: \_\_\_\_\_ \$ \_\_\_\_\_

Other: \_\_\_\_\_ \$ \_\_\_\_\_

Other: \_\_\_\_\_ \$ \_\_\_\_\_

### M. Utilities and Other Variable Charges. You will pay separately for gas, water, wastewater, electricity, trash/recycling, utility billing fees and other items as outlined in separate addenda, Special Provisions or an amendment to this Lease.

Utility Connection Charge or Transfer Fee: \$ 10.00 (not to exceed \$50) to be paid within 5 days of written notice (Par. 3.5)

N. Other Charges and Requirements. You will pay separately for these items or comply with these requirements as outlined in a Master Lease Addendum, separate addenda or Special Provisions. Initial Access Device: \$ \_\_\_\_\_

Additional or Replacement Access Devices: \$ \_\_\_\_\_ Required Insurance Liability Limit (per occurrence): \$ 100000.00

Special Provisions. See Par. 32 or additional addenda attached. This Lease cannot be changed unless in writing and signed by you and us.

Apt 932  
Beaumont TX

## Transactions

Use the **All Accounts** selector to view transactions and balances for a single account.

**AUG 23**

Stoneleigh Opera RENT Preferred Club  
*PREFERRED CLUB (\*3804)*  
Uncategorized Expense

-\$1,676.95

**AUG 21**

Stoneleigh Opera RENT Preferred Club  
*PREFERRED CLUB (\*3804)*  
Uncategorized Expense

-\$189.19

**JUL 29**

Stoneleigh Opera RENT Preferred Club  
*PREFERRED CLUB (\*3804)*  
Uncategorized Expense

-\$701.41

**JUL 2**

Stoneleigh Opera RENT PREFERRED CLUB  
*PREFERRED CLUB (\*3804)*  
Uncategorized Expense

-\$1,253.5

Feedback

**MAY 29**

Stoneleigh Opera RENT PREFERRED CLUB  
*PREFERRED CLUB (\*3804)*  
Uncategorized Expense

-\$1,256.45



ppt 9.22

## Payments

No Balance Due

\$0.00

[View Details](#)

Make a Payment

Alerts

You have no  
Nice

Ledger Wallet Auto-Payments

Full Ledger Payments

Jul 1, 2024	Charge - Gas/Resident Utility Billing - Gas From 05/19/2024 To 06/19/2024	Property	\$8.36	(\$82.15)
Jul 1, 2024	Charge - Gas/Resident Utility Billing - Gas Billing Fee	Property	\$3.00	(\$90.51)
Jul 1, 2024	Charge - Monthly Valet Trash - Posted from 07/01/2024 to 07/31/2024	Property	\$25.00	(\$93.51)
Jul 1, 2024	Charge - Rent	Property	\$1,105.00	(\$118.51)
Jul 1, 2024	Charge - Monthly Animal Rent-Monthly - Posted from 07/01/2024 to 07/31/2024	Property	\$30.00	(\$1,223.51)
Jun 28, 2024	Payment - eCheck 3604	You	\$1,253.51	(\$1,253.51)
Jun 1, 2024	Charge - Gas/Resident Utility Billing - Gas From 04/19/2024 To 05/19/2024	Property	\$8.44	\$0.00
Jun 1, 2024	Charge - Boiler Management - Boiler From 04/19/2024 To 05/19/2024	Property	\$8.75	(\$8.44)



Stoneleigh on Major  
4550 N. Major Drive  
Beaumont, TX 77713

Statement Date: Aug 20, 2024

Outstanding Balance: \$1,675.00

Rose Mary Taylor  
1141 CHESTERFIELD DR  
WEBB CITY, MO 64870-8238

Lease: 16085890  
Unit: Bldg 9 922  
Move In Date: 12/30/2022  
Lease Start Date: 01/30/2024  
Lease End Date: 02/28/2025  
Notice Given Date: 06/18/2024  
Move Out Date: 08/17/2024

#### Lease Holders

Name	Occupant Type
Rose Taylor	Primary
Darrall Taylor	Spouse

#### Outstanding Charges

Date	Description	Notes	Amount	Taxes	Total Amount
08/20/2024	Damages	Deflea, Deodorize and Carpet Shampoo	\$125.00	\$0.00	\$125.00
08/20/2024	Early Termination	Current lease does not expire until 2/28/2025	\$2,000.00	\$0.00	\$2,000.00
			0		
Total Unpaid Charges:					\$2,125.00

#### Repayment Agreements

ID	Start Date	End Date	Payments Due	Payment Amount	Due Now	Balance

ID	Start Date	End Date	Payments Due	Payment Amount	Due Now	Balance
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Total Repayment Agreement Balance: \$0.00

#### Deposits

Date	Description	Amount
12/30/2022	Animal Deposit	\$200.00
12/29/2022	Security Deposit	\$250.00

Total Deposits Held: \$450.00

#### Unapplied Payments / Credits

Date	Description	Notes	Amount	Taxes	Total Amount
------	-------------	-------	--------	-------	--------------

Total Unapplied Payments / Credits: \$0.00

Outstanding Balance: \$1,675.00



unemployment

## Claim and Payment Status

## Claimant Information

Name: DARRALL W TAYLOR  
 Social Security Number (SSN): XXX-XX-7075

[Printer-friendly Summary](#)

## Claim Information

Claim Type: Regular Unemployment Benefits  
 Claim Start Date: May 12, 2024  
Weekly Benefit Amount: \$577.00  
 Maximum Possible Benefits: \$15,002.00  
 Benefits Paid to Date: \$7,501.00  
Benefits Remaining: \$7,501.00  
 Next Date to Request Payment: On your scheduled filing day during the week beginning Sep 01, 2024  
 Your Scheduled Filing Day is: WEDNESDAY

## Most Recent Payment

TWC Processed Date: Aug 22, 2024  
Amount Deposited: \$1,154.00  
 For Week(s): Aug 11, 2024 to Aug 17, 2024  
 Aug 04, 2024 to Aug 10, 2024  
 May 12, 2024 to May 18, 2024

This is not a full payment for the week(s) listed. [View Payment Details by Week](#)

## Payment Summary

[Printer-friendly Summary](#)[View Payment Details by Week](#)

1 2 Next

1-12 of 14

Week(s)	TWC Processed Date	Deduction(s)	Payment
Aug 11, 2024 to Aug 17, 2024	Aug 22, 2024	\$0.00	\$0.00
Aug 04, 2024 to Aug 10, 2024	Aug 22, 2024	\$0.00	\$577.00
Jul 28, 2024 to Aug 03, 2024	Aug 08, 2024	\$0.00	\$577.00
Jul 21, 2024 to Jul 27, 2024	Aug 08, 2024	\$0.00	\$577.00
Jul 14, 2024 to Jul 20, 2024	Jul 25, 2024	\$0.00	\$577.00
Jul 07, 2024 to Jul 13, 2024	Jul 25, 2024	\$0.00	\$577.00
Jun 30, 2024 to Jul 06, 2024	Jul 11, 2024	\$0.00	\$577.00
Jun 23, 2024 to Jun 29, 2024	Jul 11, 2024	\$0.00	\$577.00
Jun 16, 2024 to Jun 22, 2024	Jun 27, 2024	\$0.00	\$577.00
Jun 09, 2024 to Jun 15, 2024	Jun 27, 2024	\$0.00	\$577.00
Jun 02, 2024 to Jun 08, 2024	Jun 13, 2024	\$0.00	\$577.00
May 26, 2024 to Jun 01, 2024	Jun 13, 2024	\$0.00	\$577.00

1 2 Next

[View Payment Details by Week](#)

1 ASI WAY  
ST. PETERSBURG, FL 33702

**PROGRESSIVE**  
RENTERS

### Homeowners Declaration Page

**Agent:**

TWFG-Tamra Galvan  
813 N Main St  
Lumberton, TX 77657

Agent Code: 434432  
For Policy Service, Call: (409)227-3107  
To File a Claim, Call: 866-274-5677

Total Policy Premium: \$325.60  
Policy Number: TXL1178597  
Plan Type: HO4  
Policy Inception: 12/31/2023  
Policy Expiration: 12/31/2024

**Named Insured:**

DARRAL W TAYLOR AND ROSE TAYLOR  
4550 N MAJOR DR  
APT 922  
BEAUMONT, TX 77713-8649

Effective Date of This Transaction: 12/31/2023

Activity of This Transaction: Renewal

**Residence Premises:**

4550 N MAJOR DR APT 324  
BEAUMONT, TX 77713-8590

Type of Residence: Apartment

Coverage at the residence premises is provided only where a limit of liability is shown or a premium is stated.

Coverages and Limits of Liability		Limit	Premium
SECTION I:	C. Personal Property	\$50,000	319.57
	D. Loss of Use	\$20,000	Included
SECTION II:	E. Personal Liability - Each Occurrence	\$300,000	45.00
	F. Medical Payments to Others - Each Person	\$5,000	10.00
OTHER COVERAGES AND ENDORSEMENTS:			
(Printed on the following page)			
DEDUCTIBLE: \$500			

Special Messages: OTHER COVERAGES, LIMITS AND EXCLUSIONS APPLY - REFER TO YOUR POLICY FOR DETAILS

THIS POLICY DOES NOT INCLUDE COVERAGE FOR FLOOD LOSSES.

A POLICY FEE OF \$50 APPLIES TO ALL POLICIES REGARDLESS OF HOW LONG THE POLICY IS IN FORCE. THIS IS NOT REFUNDED WHEN THE POLICY IS CANCELLED.



President



Other Coverages And Endorsements		Form Number	Limit	Premium
Additional Interest		ASI HO AINT 06 15		
Renters Protection Policy		ASI HOR TX 12 19		
Policy Fee				50.00
TX FAIR Plan Assessment Fee				Included
Tier Factor Premium				32.32
Household Factor				-104.99
All Perils Deductible			500	Included
Type of Dwelling				-16.30
E-Policy (Paperless)				-10.00
Scheduled Items:			Value	Premium
Description				

**Additional Interest:**

Stoneleigh on Major  
4550 N Major Dr  
Beaumont, TX 77713  
Interest:  
Property Manager

**Special Conditions:**

PLEASE READ YOUR POLICY DOCUMENTS CAREFULLY AS SPECIAL CONDITIONS AND EXCLUSIONS APPLY.  
THESE INCLUDE, AMONG OTHERS:

1. LIMITED LIABILITY FOR WATERCRAFT AND RECREATIONAL VEHICLES
2. NO LIABILITY COVERAGE FOR PROHIBITED ANIMALS

**Notes:**

**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)
	)	Re: Docket No. ____

**ORDER SUSTAINING  
DEBTORS' OBJECTION  
TO CLAIM NO. 1133**

Upon the objection (the “**Objection**”)<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”) disallowing the 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 Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the 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

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<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.veritaglobal.net/ZHI](http://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.

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

(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 Proof of 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 Debtor entity under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the 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 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 Debtors’ estates; or (i) a concession by the 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 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

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THE HON. MARVIN P. ISGUR  
UNITED STATES BANKRUPTCY JUDGE