

**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)
)	

**DEBTORS' OBJECTION
TO PROOF OF CLAIM OF CHARLES GOSEY**

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. 1044 (the “**Claim**”) filed by Charles Gosey (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.

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



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 29, 2024, the Claimant filed the Claim as a 507(a)(4) and (7) claim against Zachry Holdings, Inc. A true and correct copy of the Claim is attached hereto as **Exhibit**

B.

11. Claimant seeks \$18,000.00. The alleged basis for the claim is “Lost wages, credit cards, medical expenses.”

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, Debtors have thoroughly reviewed the Debtors’ books and records and the Claim, and cannot determine the validity of the claim. The Claimant did not include any supporting documentation and only provided what appears to be a credit report and medical records. Debtors contacted Claimant on November 27, 2024, and explained that Debtors are not responsible for personal expenses. Claimant stated he understood and agreed to withdraw the Claim but failed to do so. Additionally, Debtors’ books and records do not reveal any obligations due and owing to the Claimant. 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

rcordell@hicks-thomas.com

Mariana L. Jantz

Texas Bar No. 24139241

S.D. Tex. ID No. 3862084

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.

EXHIBIT**A**

**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)
)	

**DECLARATION OF WILLIAM B. MURPHY
IN SUPPORT OF DEBTORS' OBJECTION TO
PROOF OF CLAIM NO. 1044**

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.

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’ 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.

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. 1044* (the "**Objection**").²

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

1. 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 27, 2024, requesting additional information to support the Claim. Claimant stated he understood he would not be reimbursed for personal expenses but has failed to withdraw the Claim.

2. 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 such, I believe that the failure to provide such supporting documentation within 30 days from the

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

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

ID: 26207071

PIN: aEzMPehg

United States Bankruptcy Court for the Southern District of Texas, Houston Division

Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Zachry Holdings, Inc. (Case No. 24-90377) | <input type="checkbox"/> Zachry Constructors, LLC (Case No. 24-90384) | <input type="checkbox"/> Zachry Maintenance Services, LLC (Case No. 24-90395) |
| <input type="checkbox"/> Computer Simulation & Analysis, Inc. (Case No. 24-90391) | <input type="checkbox"/> Zachry Engineering Corporation (Case No. 24-90379) | <input type="checkbox"/> Zachry Nuclear Construction, Inc. (Case No. 24-90388) |
| <input type="checkbox"/> J.V. Industrial Companies, LLC (Case No. 24-90396) | <input type="checkbox"/> Zachry Enterprise Solutions, LLC (Case No. 24-90386) | <input type="checkbox"/> Zachry Nuclear Engineering, Inc. (Case No. 24-90390) |
| <input type="checkbox"/> JVIC Fabrication, LLC. (Case No. 24-90393) | <input type="checkbox"/> Zachry EPC Holdings, LLC (Case No. 24-90378) | <input type="checkbox"/> Zachry Nuclear, Inc. (Case No. 24-90389) |
| <input type="checkbox"/> Madison Industrial Services Team, LLC (Case No. 24-90397) | <input type="checkbox"/> Zachry High Voltage Solutions, LLC (Case No. 24-90381) | <input type="checkbox"/> Zachry Plant Services Holdings, Inc. (Case No. 24-90392) |
| <input type="checkbox"/> Moss Point Properties, LLC (Case No. 24-90387) | <input type="checkbox"/> Zachry Industrial Americas, Inc. (Case No. 24-90394) | <input type="checkbox"/> ZEC Michigan, Inc. (Case No. 24-90383) |
| <input type="checkbox"/> UE Properties, Inc. (Case No. 24-90382) | <input type="checkbox"/> Zachry Industrial, Inc. (Case No. 24-90385) | <input type="checkbox"/> ZEC New York, Inc. (Case No. 24-90380) |

Modified 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. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

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, May 21, 2024.

Part 1: Identify the Claim

NameID: 15562583

1. Who is the current creditor?	Charles Gosey 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? Charles Gosey 5050 Timber Creek Loop #36 Beaumont, TX 77708 Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) Address _____ Contact phone _____ Contact email _____ Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) Charles M Gosey Name 5050 Timbercreek Loop Unit 36 Number Street Beaumont Tx 77708 City State ZIP Code United States Country Contact phone (409) 397-3407 Contact email gchil2983@gmail.com
4. Does this claim amend one already filed?	<input 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



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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?

☒ No

☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim?

\$ 18,000

Does this amount include interest or other charges?

☐ No

☒ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

If applicable, the claim must include information regarding payment received from any third party on account of, in connection with, or otherwise relating to the claim. Please list such information in the supporting documentation to the claim.

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.

Lost wages, credit card, medical expense

9. Is all or part of the claim secured?

☒ No

☐ Yes. The claim is secured by a lien on property.

Nature of property:

☐ Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.

☐ Motor vehicle

☐ Other. Describe: _____

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.)

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.)

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate (when case was filed) _____ %

☐ Fixed

☐ Variable

10. Is this claim based on a lease?

☒ No

☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff?

☒ No

☐ Yes. Identify the property: _____



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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).

\$ 13,600

☐ 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 08 23 2024
MM / DD / YYYY

Signature

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

Name

Chaler
First name

Manuel
Middle name

Gorey
Last name

Title

Company

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

Address

5050 Timbercreek Loop Unit 36
Number Street

Beaverton
City

TX
State

77708
ZIP Code

US
Country

Contact phone

(409) 347-3407

Email

gchir123@gmail.com
~~409-347-3407~~

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Charles M Gorey
ID: 26207071

Cell #: (409) 397-3407

gcm12183@gmail.com

Closed accounts

Case# 24-90377

This account was closed on Mar 4, 2024

AMERICAN EXPRESS

Last reported Aug 18, 2024

\$5,113

Reported balance

Credit limit

--

Information not available

OVERVIEW

Credit limit

--

Minimum monthly payment

\$0

Opened

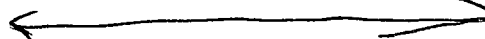
Feb 21, 2018 (6 yrs, 6 mos)

PAYMENT HISTORY

You've made **85%** of payments on time

	J	F	M	A	M	J	J	A	S	O	N	D
2024												
2023	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Laid off



Good Working



Today



Credit



Cards



Loans



Money

Never missed payment until laid off



PAYMENT HISTORY

You've made 85% of payments on time

J F M A M J J A S O N D
Leiv off
2024 X X X X X X X

2023 ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓

2022 ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓

2021 ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓

2020 ✓ ✓ ✓ ✓ ✓

✓ Current X Not current

Last payment --

Payment status 120-149 days late

Amount past due \$923

Worst payment status 120-149 days late

ACCOUNT DETAILS



Today



Credit



Cards



Loans



Money

Good Working



Last payment --

Payment status 120-149 days late

Amount past due \$923

Worst payment status 120-149 days late

ACCOUNT DETAILS

Account status Closed

Type Credit card

Responsibility Individual

Remarks Canceled by credit grantor

Times 30/60/90 days late 1/1/5

Closed Mar 04, 2024

CONTACT INFO

AMERICAN EXPRESS
P.O. BOX 981537
EL PASO, TX 79998 USA
(800) 874-2717



Today



Credit



Cards



Loans



Money



**Memorial MRI
& Diagnostic**

Phone: (713) 461-3399

Fax: (713) 461-1969

Charles M Gosey
ID: 26207071

Case #. 24-90377

Patient ID: MMD1628417000

Patient Name: Gosey, Charles

DOB: 13-Apr-1983

Modality: CT

Exam Date: 08-Apr-2024 11:26 AM

Accession #: 5330907

Referred By: Anson Huynh

Location: CT_3980

CT Abdomen with and without Contrast

EXAM: CT ABDOMEN WITH AND WITHOUT IV CONTRAST

HISTORY: Abdominal pain for 6 months.

TECHNIQUE: Axial CT images of the abdomen were obtained before and after IV contrast administration. Multiplanar reconstructions. The protocol utilizes one or more of the following dose reduction techniques: automated exposure control, adjustment of mA and/or kV according to patient size, and/or use of iterative reconstruction technique.

IV Contrast: Omnipaque 300, 100 cc.

COMPARISON: None available.

FINDINGS:

LOWER CHEST: Lung bases are clear. No cardiomegaly or pericardial effusion observed.

LIVER: Diffuse hepatic steatosis, without focal cystic or solid mass.

GALLBLADDER AND BILIARY TREE: No calcified gallstones. There is no gallbladder distension or wall edema. No intra- or extrahepatic biliary ductal dilation.

PANCREAS: No focal cystic or solid mass.

SPLEEN: Normal size without focal cystic or solid mass.

ADRENAL GLANDS: Non-enlarged.

KIDNEYS AND URETERS: Normal renal size and position. There are two Bosniak I simple cysts in the right kidney measuring 7 mm and 15 mm. In the upper pole of the right kidney two tiny calcified stones measure 1 mm and 2 mm. In the left kidney there are at least 3 punctate calculi measuring 1-2 mm. There is no hydronephrosis.

BOWEL: There is a moderate size hiatal hernia. No stomach or bowel distension. No focal inflammatory change observed.

LYMPH NODES: Not enlarged mesenteric or retroperitoneal lymph nodes.

PERITONEUM: No ascites or free air. No other fluid collection.

VESSELS: Aorta is non-dilated.

ABDOMINAL WALL: Fat-containing supraumbilical hernia measuring 20 mm and fat-containing umbilical hernia measuring 14 mm.

BONES: No lytic or blastic abnormality observed.

IMPRESSION:

Bilateral nephrolithiasis without hydronephrosis. Bosniak I simple cysts in the right kidney, benign.

Fat-containing supraumbilical and umbilical hernias.

Moderate size hiatal hernia.

Thank you for the opportunity to assist in your patient's care.

**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)
)	Re: Docket No. ____

**ORDER SUSTAINING
DEBTORS' OBJECTION
TO CLAIM NO. 1044**

Upon the objection (the “**Objection**”)² 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

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

² 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

THE HON. MARVIN P. ISGUR
UNITED STATES BANKRUPTCY JUDGE