

**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)
	)	<b>Re: Docket No. 1406</b>

**STIPULATION AND AGREED ORDER REGARDING THE CLAIMS OF MOBILE  
MODULAR MANAGEMENT CORPORATION (MCGRATH RENTCORP)**

This stipulation and agreed order (this “**Stipulation and Agreed Order**”) is made by and among Mobile Modular Management Corporation (a/k/a McGrath Rentcorp) (“**McGrath**”) and Zachry Holdings, Inc. and its affiliated debtors and debtors in possession (the “**Debtors**,” and together with McGrath, the “**Parties**,” and each a “**Party**”). The Parties hereby stipulate and agree as follows:

**WHEREAS**, on May 21, 2024, the 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 June 14, 2024 and September 16, 2024, McGrath filed proofs of claim in the Chapter 11 Cases (Claim Nos. 300, 1545, 1558) against the Debtors (collectively, the “**Claims**”);

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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.



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**WHEREAS**, on November 13, 2024, the Debtors filed the *Debtors' Fourteenth Omnibus Objection to Certain Proofs of Claim (Reduced Claims)* [Docket No. 1406] (the “**Objection**”).

The Objection set forth, among other claims objections, an objection to one of the Claims;

**WHEREAS**, the Parties have reached an agreement with respect to the Claims, and have agreed to the treatment of the Claims on the terms and conditions set forth in this Stipulation and Agreed Order.

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

1. Claim No. 1545 shall be allowed as a General Unsecured Claim<sup>2</sup> in an amount equal to \$1,035,878 (the “**Allowed Claim**”).

2. The remaining Claims (Claim Nos. 300 and 1558) shall be disallowed in their entirety.

3. \$963,621.49 of the Allowed Claim shall be paid as a Cure Claim in full and final satisfaction of any and all Cure Claims of McGrath and its affiliates.

4. The Objection as to Claim No. 1545 is deemed resolved and withdrawn without prejudice.

5. 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 Stipulation and Agreed Order.

6. This Stipulation and Agreed Order is subject to the approval of the Court and shall be of no force and effect unless it is approved by the Court.

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Further Modified First Amended Joint Chapter 11 Plan of Reorganization of Zachry Holdings, Inc. and Its Debtor Affiliates* [Docket No. 2363].

7. The terms and conditions of this Stipulation and Agreed Order shall be immediately effective and enforceable upon entry by the Court.

8. This Stipulation and Agreed Order may be signed in counterparts and signatures may be delivered by fax or email, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument. Each of the undersigned counsel that executes this Stipulation and Agreed Order by or on behalf of each respective Party represents and warrants that such undersigned counsel has been duly authorized and empowered to execute and deliver this Stipulation and Agreed Order on behalf of such Party.

9. Each Party represents and warrants that it is duly authorized to enter into and be bound by this Stipulation and Agreed Order.

10. This Stipulation and Agreed Order constitutes the entire agreement between the Parties with respect to the subject matter hereof and shall not be modified, altered, amended, or vacated without the prior written consent of all Parties hereto or by order of the Court.

11. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation and Agreed Order.

Signed: \_\_\_\_\_, 2025

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THE HON. MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

**STIPULATED AND AGREED THIS 10TH DAY OF APRIL, 2025:**

*/s/ Charles R. Koster*

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*Counsel to the Debtors and  
Debtors in Possession*

*Counsel to Mobile Modular Management  
Corporation (a/k/a McGrath Rentcorp)*

**Certificate of Service**

I certify that on April 10, 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