

**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)
	)	
Reorganized Debtors.	)	(Jointly Administered)
	)	

**STIPULATION AND AGREED ORDER REGARDING THE CLAIMS OF J2  
RESOURCES, LLC**

---

This stipulation and agreed order (this “**Stipulation and Agreed Order**”) is made by and among J2 Resources, LLC (“**J2**”) and Zachry Holdings, Inc. and its affiliated debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**,” and together with J2, 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 September 13, 2024, J2 filed four proofs of claim in the Chapter 11 Cases (Claim Nos. 1387, 1525, 1528, and 1529) against the Debtors (collectively, the “**Claims**”);

**WHEREAS**, on March 20, 2025, the Debtors filed the *Debtors’ Thirty-Second Omnibus Objection to Certain Proofs of Claim (Reduced Claims)* [Docket No. 2582] (the “**Objection**”). The Objection set forth, among other objections, an objection to one of the Claims (Claim No. 1525) (the “**Disputed Claim**”); and

---

<sup>1</sup> The last four digits of Zachry Holdings, Inc.’s tax identification number are 6814. A complete list of each of the Reorganized 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 Reorganized Debtors’ claims and noticing agent at [www.veritaglobal.net/zhi](http://www.veritaglobal.net/zhi). The location of the Reorganized Debtors’ service address in these Chapter 11 Cases is: P.O. Box 240130, San Antonio, Texas 78224.



2490377250417000000000003

**WHEREAS**, the Parties have reached an agreement with respect to the Claims and the Objection 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. The Disputed Claim (Claim No. 1525) shall be allowed in the total amount equal to \$200,467.98, of which \$194,803.15 shall be a General Unsecured Claim<sup>2</sup> and \$5,664.83 shall be an Other Priority Claim.

2. The Objection solely as to the Disputed Claim is deemed withdrawn without prejudice.

3. The remaining Claims (Claim Nos. 1387, 1528, and 1529) shall be deemed withdrawn in their entirety.

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 Stipulation and Agreed Order.

5. 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.

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

7. 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

---

<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. 2362].

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.

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

9. 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.

10. 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

---

THE HON. MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

**STIPULATED AND AGREED THIS 17TH DAY OF APRIL, 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

/s/ Grant Gaines

**PATEL GAINES**

Grant Gaines  
2030 N Loop 1604 W, Suite 200  
San Antonio, Texas 78248  
Telephone: (210) 460-7787  
Facsimile: (210) 460-7797  
Email: ggaines@patelgaines.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*)  
Adam T. Swingle (admitted *pro hac vice*)  
Barrett Lingle (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  
adam.swingle@whitecase.com  
barrett.lingle@whitecase.com

*Counsel to the Reorganized Debtors*

*Counsel to J2 Resources, LLC*

**Certificate of Service**

I certify that on April 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